

MEDICAL COUNCIL OF IRELAND

FITNESS TO PRACTISE COMMITTEE
UNDER PART 8 OF THE MEDICAL PRACTITIONERS ACT 2007

RE: DR. HASSAAN AFFA BEG CHUGHTAI
REGISTRATION NO: 405670

REMOTE HEARING BEFORE THE FITNESS TO PRACTISE COMMITTEE
(IN PUBLIC) VIA TRIALVIEW
ON THURSDAY, 18TH APRIL, 2024 - DAY 2

2

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APPEARANCES

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DR. MARY DAVIN-POWER

LEGAL ASSESSOR :

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FOR THE CEO :

MR. HUGH McDOWELL BL

INSTRUCTED BY :

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SOLICITOR
MESSRS. FIELDFISHER
SOLICITORS

FOR THE REGISTRANT :

SELF-REPRESENTING

ALSO PRESENT :

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CEO EXPERT WITNESS

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1 THE HEARING RESUMED AS FOLLOWS ON THURSDAY,
2 18TH APRIL, 2024:

3
4 CHAIRPERSON: Good morning to you all. This is Day 2
5 of a Fitness to Practise Inquiry under Part 8 of the 10:05
6 Medical Practitioners Act of 2007. It is an inquiry
7 into allegations of professional misconduct and/or poor
8 professional performance and/or a contravention of a
9 provision of the Medical Practitioners Act 2007,
10 including a provision of any regulations or rules made 10:06
11 under this Act on the part of Dr. Hassaan Chughtai,
12 registration no. 406670.

13
14 For the benefit of anyone who wasn't at yesterday's
15 hearing, I will just briefly introduce the Fitness to 10:06
16 Practise Committee members who are here today. My name
17 is Paul Harkin, I am chairing this Inquiry Committee, I
18 am not a medical practitioner. Also on the Committee
19 is Ms. Mary Devins, who is also not a medical
20 practitioner, and Dr. Mary Davin-Power, who is a 10:06
21 medical practitioner.

22
23 And the Fitness to Practise Committee is supported by
24 Mr. Diarmaid McGuinness, senior counsel, who is legal
25 assessor to the Committee. 10:06
26

27 So this is, as I say, Day 2 of an inquiry that is being
28 held in public. When we concluded yesterday we were
29 hearing evidence from witness A. A number of matters

1 arose on the previous day, and I am just wondering if
2 Mr. McDowell would have an update for us on any
3 correspondence from the Registrant overnight?

4 MR. McDOWELL: Yes, chairperson, thank you and good
5 morning.

10:07

6
7 So just before I address you on that, I might just ask
8 that you would remind anybody present that there is a
9 reporting restriction in place in this case and the
10 complainant is to be identified as Witness A.

10:07

11 CHAIRPERSON: I am happy to remind all parties of that
12 decision that was previously made to maintain the
13 privacy of Witness A.

14 MR. McDOWELL: Thank you.

10:07

15
16 SUBMISSION BY MR. McDOWELL:

17
18 MR. McDOWELL: I might ask Ms. Horan or TrialView to
19 bring up a small updated book of inter partes
20 correspondence which relates to a number of exchanges
21 that have taken place overnight.

10:07

22 CHAIRPERSON: So for our record-keeping we will accept
23 this as Exhibit 8.

24 MR. McDOWELL: 8, thank you. So, chairperson, you will
25 see that yesterday evening at just before quarter past
26 9, Ms. O'Sullivan wrote to Mr. Chughtai enclosing a
27 copy of the transcript of yesterday's hearing, and
28 informed Dr. Chughtai in the last line of paragraph 2
29 that the CEO's case was opened by me, and that the

10:08

1 examination-in-chief of witness A had commenced. She
2 then says:

3
4 "We note from the call with you this evening that you
5 relayed that you were in the A&E at the time and
6 were waiting on an ECG. As discussed, it is open to
7 you to provide medical evidence to the Committee in
8 respect of your admission to hospital which will be
9 considered by the Committee, tomorrow, 18 April
10 2024, at the outset of day 2 of the Inquiry. If you
11 wish to provide medical evidence to be considered by
12 the Committee, you can forward it to me by e-mail.

13
14 "Please note that it remains open to the Committee to
15 proceed with the Inquiry tomorrow in your absence. The
16 Inquiry is due to resume at approximately 10am
17 tomorrow. If you wish to attend you can log on via
18 Trialview."

19
20 And then you will see that -- if I go down to the next
21 page, chair, you will see that Dr. Chughtai replied at
22 three minutes to six this morning. And you will see
23 that he says:

24
25 "Ms. Sara

26
27 "At first I think I shouldn't be contacted while in
28 A&E.
29

10:08

10:09

1 "I hope partial discharge summary will be given now and
2 I am waiting cardiac assessment hopefully today.

3
4 "As I have been told to avoid stressful work I hope I
5 would like to clarify my position regarding delay
6 shortly.

7
8 "Firstly Mr. McDowell said change of solicitor. My
9 first legal team I instructed from hospital and have to
10 discharge on request of garda who threaten me if I
11 didn't do that I will continue face case don't involve
12 solicitor.

13
14 "Phone call from garda January and later. PPC
15 Committee can get phone recording. Second team again
16 suggested by phone caller from caller one of Galway
17 University person who didn't remember about my case
18 date and I.

19 Third team also suggested by one of their caller, John
20 and Teresa Friend.

21
22 "Unfortunately my main disagreement in December was why
23 barrister doesn't request full garda disclosure and my
24 fabricated statement that was part of record. He was
25 suggesting me there is link between page 1 and page 4
26

27 "Secondly in January you didn't put date. February no
28 barrister available and then I contacted London
29 solicitor again when I became sick as I couldn't afford

1 further delay.

2
3 "At that time Eoin finally find some barrister but by
4 that time I had already told solicitor to do something
5 and I have informed Eoin as well.

6
7 "I can't believe that firstly IMC PPC Committee didn't
8 request basic stuff (if they had high court like power)
9 to get forensic analysis. If complainant electronic
10 device that has been told to me first time now and I
11 totally disagree that it doesn't needed. It needed as
12 you people are blaming stuff that never been carried
13 out by me. You people are sending inappropriate stuff
14 and now running away from forensic analysis of your own
15 electronic device.

16
17 "Secondly this is only first time I request few week
18 delay. To get forensic of at least mine because we
19 need to know why this going on for almost 8yrs and no
20 forensic from garda, we need garda full disclosure.

21
22 "Most obvious reason in forensic it may be exposed what
23 Witness A is texting to garda themselves. Her further
24 communication with other person that may explained
25 calls to me.

26
27 "Let me make absolutely clear without forensic any
28 stuff said in public will be considered harassment and
29 you will be on full proof to defend in court where I

1 lives now you are harassing me stop now... who ever it
2 is either PPC Committee, Witness A, your barrister, PPC
3 Committee barrister, and you people are defaming me
4 without doing basic stuff.

5
6 "This is harassment. Stop it immediately. I strongly
7 object this hearing ongoing without awful jurisdiction
8 without consent in my absence when already this
9 complaint investigation started when I wasn't
10 registered. This is defamation and harassment and
11 should stop immediately.

12
13 "I hold my right to write full explanation after
14 cardiac assessment. Summary of up till hospital event
15 will be given now and will be forwarded before 10 to
16 you.

17
18 "Kindly don't harass me at least till I am in
19 hospital."

20
21 So that was at three minutes to six. Then you will see
22 the next e-mail is at 36 minutes past six.

23 Dr. Chughtai says:

24
25 "Don't make it record of public at least till we can
26 discuss further. Secondly apart from screen shot (as I
27 said exclude screen shot, as it can easily be altered
28 and mislead, doesn't show full interaction). If
29 complainant have any other evidence that she can proof

10:11

1 originated from me or my belonging please let me know I
2 will only send question about them. Rest is hearsay."
3 Then the third e-mail is on the next page, which is 17
4 minutes past eight, and it says:

5
6 "Attach with e-mail A&E letter
7 Diagnosis angina
8 Awaiting cardiac assessment.

10:12

9
10 "Hassaan."

10:12

11
12 And then attached to that e-mail was a report from
13 St. George's University Hospital NHS. And I know that
14 the report is slightly unclear, but you will see in the
15 right-hand side that the date is 17th April, so that's
16 yesterday.

10:12

17
18 You will see that towards the bottom the name given is
19 Hassaan Chughtai. And there is a mobile, an Irish
20 mobile phone number at the very bottom. Then on the
21 next page you will see it says:

10:12

22
23 "Your patient attending the ED Department on:
24 17/Apr/2024 13:35:00."

10:12

25
26 And just to put that time in context, the e-mails that
27 you saw yesterday after lunch were sent between quarter
28 past and 20 past one.

1 And then there is some -- you will see under discharge
2 method it says:

3
4 "Treatment complete. Discharge destination: Usual
5 place of residence. Discharge follow up: Ambulatory 10:13
6 care service. Source of referral: Self-referral.
7 Incident occurred at living room. Clinician comments:
8 Presented with exertional chest pain and palpitation.
9 O/E - stable. Vitals - normal. ECG - sinus tachy.
10 Blood - normal. IMP stable angina for RACPC."

11
12 And then at the bottom it says:

13
14 "Diagnosis: Stable angina."

15
16 And although it is not exactly clear from the copy on
17 screen, at the very bottom it says:

18
19 "Printed by: Tara Jane Margaret Lacey."

20
21 And then it says:

22
23 "Printed at...", I know you can't see it, but it says:

24
25 "18th April 2024, 8:06." 10:14

26
27 So that's this morning at 8:06.

28
29 Then on the next page some medical information is

1 given. Under treatment it says:

2
3 "Verbal advice."

4
5 Under medications it says:

10:14

6
7 "None."

8
9 And you will see that no medications are administered
10 to the patient while in ED. And that's the extent of
11 the information that was attached to the e-mail.

10:14

12
13 I think that then this morning, a little bit later this
14 morning, after that document was prepared, at 9:29,
15 Dr. Chughtai sent on clearer versions of those
16 documents, but the information is all the same. So
17 that's the correspondence that has taken place
18 overnight.

10:14

19
20 So it is really a matter for the Committee as to how it
21 wants to deal with all of that. I didn't read
22 Dr. Chughtai's e-mails as requesting an adjournment
23 this morning necessarily but perhaps it is open to
24 interpretation. But certainly I am in a position to
25 proceed with witness A's resumed examination-in-chief.

10:15

26 CHAIRPERSON: Thank you very much, Mr. McDowell, for
27 that update. I will ask my Committee colleagues if
28 they have any questions for Mr. McDowell in respect of
29 what has been presented? No. Likewise I don't. So I

10:15

1 should just acknowledge that we appreciate, the
2 Committee appreciates Dr. Chughtai's efforts in getting
3 this correspondence to us overnight and that's very
4 much appreciated. Mr. McGuinness, is there any matter
5 that you would like to draw to our attention?

10:15

6
7 LEGAL ADVICE BY MR. MCGUINNESS:

8
9 MR. MCGUINNESS: Thank you, Chairman and Committee.
10 Obviously the Committee has to be careful to consider
11 what course of action it takes, in particular what
12 course of action is being urged upon it by Mr. McDowell
13 on behalf of the CEO. I did open relevant passages
14 yesterday relating to the difference in position
15 between registrant doctors who are answering a charge
16 who voluntarily decide not to participate and those who
17 may be either incapacitated or unable, whether for a
18 short period or otherwise from participating in the
19 proceedings.

10:16

10:16

20
21 Obviously the most important function of the Committee
22 is fairness of procedure and natural justice of course
23 which is reflected in the statutory provisions I opened
24 yesterday. The doctor has a right to be present or to
25 have an opportunity to be present and a right to be
26 heard and fully defend and cross-examine.

10:16

10:17

27
28 The characterisation of the letters or information
29 received today and referred to by Mr. McDowell, the

1 interpretation of those is primarily for the Committee.
2 It would appear inevitably to be a protest against the
3 way the Committee is proceeding, and the Committee
4 therefore, in my submission, ought to carefully
5 consider all possible options before deciding which way 10:17
6 it ought to proceed.

7
8 Subject to what Mr. McDowell would say, it would appear
9 that it would have been the intention of the CEO to
10 continue with witness A's evidence and perhaps then, or 10:17
11 perhaps not, defer the cross-examination until a day
12 when the doctor was able to and willing to attend.
13 That would obviously necessitate an adjournment of some
14 duration before that were to occur.

15 10:18
16 The other course of action which he hasn't suggested
17 yet is proceeding with all of the evidence in the
18 doctor's absence subject only to a right of the doctor
19 to reappear and to cross-examine at that point in time.

20 10:18
21 All of the options have difficulties and dangers and it
22 might be helpful for the Committee if the Committee
23 were to consider asking Mr. McDowell on behalf of the
24 CEO to address all the options having regard to the
25 duty of the Committee and its different possible 10:19
26 options of at this stage.

27
28 SUBMISSION BY MR. McDOWELL:
29

1 MR. McDOWELL: Yes, well, I think the baseline scenario
2 if I can put it that way would be that I would conclude
3 witness A's examination-in-chief. I mean if the
4 Committee were satisfied that it was in order to
5 proceed with half of the examination-in-chief yesterday 10:19
6 in Dr. Chughtai's absence, I don't think anything has
7 changed and I don't think it affects his ability to
8 conduct a cross-examination if that's what he wants to
9 do. So at a bare minimum I would like to proceed with
10 witness A's examination-in-chief. I think we can take 10:19
11 it then that that's going to conclude probably, maybe
12 before lunch, maybe after lunch and then at that stage
13 I would take it that Dr. Chughtai won't be here and the
14 next question will be whether to proceed with the next
15 witness and I am in a position to do that, and there 10:20
16 will be then the possibility of, if Dr. Chughtai could
17 review today and yesterday's transcript and decide
18 which witnesses he wanted to cross-examine based on
19 those transcripts.

20
21 Now, on one view you might say, well, the downside of
22 that is that a witness who is giving evidence today
23 will have to come back on another day and that will
24 cause them inconvenience, but I suppose it is worth
25 bearing in mind that these witnesses have already made 10:20
26 arrangements for today. So the inconvenience is
27 happening. They have already been inconvenienced today
28 no matter which way the Committee proceeds and
29 therefore I would query whether any additional

1 inconvenience arises if the Committee decides to hear
2 their evidence-in-chief today.

3
4 I don't necessarily see a -- now, this is, I am saying
5 this with the benefit of the knowledge of the evidence 10:20
6 that's going to be given, I don't see a specific
7 unfairness that would arise from Dr. Chughtai's
8 perspective by reason of the fact that he wouldn't be
9 cross-examining the witnesses as they give their
10 evidence as opposed to all the examination-in-chiefs 10:21
11 taking place back to back. I don't think it is that
12 type of case where the examination-in-chief of witness
13 A for example might impact on the evidence or the
14 questions that might be asked of subsequent witnesses.

15 10:21
16 So the overarching instruction I have from the Chief
17 Executive is that it is a matter for the Committee to
18 decide and we are in the Committee's hands, but I
19 suppose that neutral position is being adopted against
20 a backdrop of a situation where this is already a very 10:21
21 delayed hearing which has been postponed on a number of
22 occasions and that for all of the reasons I outlined at
23 the outset yesterday morning, we are very anxious to
24 proceed with and conclude this inquiry as quickly as we
25 can. 10:21

26 CHAIRPERSON: Thank you very much, Mr. McDowell. I
27 think at this point it would be appropriate for the
28 Committee to retire into private session to consider
29 this updated correspondence from Dr. Chughtai.

1 Mr. McGuinness will accompany us but he won't be giving
2 us any additional advice. If any matter arises that
3 requires him to give updated advice, he will come back
4 and give that to the parties such that that is in
5 public and on the transcript for Dr. Chughtai's 10:22
6 benefit. But I don't expect that to be the case. So
7 we will go into private session and just consider the
8 matter.

9 MR. McDOWELL: And just, chair, before you rise, just
10 one thing I should have said, and I am only saying this 10:22
11 because I know the case and I know its history, is that
12 just so the Committee understands, when there is a
13 reference to a person called Eoin, E-o-i-n, contained
14 in Dr. Chughtai's e-mail, that's a reference I take it
15 to Eoin Craven, who was his solicitor with Daly -- DCLM 10:22
16 Solicitors. So just in case there is any confusion
17 about who the Eoin that he is referring to is.

18 CHAIRPERSON: That's very helpful, thank you very much,
19 Mr. McDowell. So we will into private session and
20 consider the matter. 10:23

21
22 THE HEARING ADJOURNED BRIEFLY AND RESUMED AS FOLLOWS:

23
24 COMMITTEE DECISION:

25 10:36
26 CHAIRPERSON: Thank you very much, Mr. Murray. Thank
27 you all for your patience. The Committee has
28 considered the matters that has been put in front of us
29 and we have decided that we are happy for Mr. McDowell

1 to continue with witness A's evidence.

2
3 I have a question for you, Mr. McDowell, to what extent
4 do you have further witnesses available for today?

5 MR. McDOWELL: So I have three witnesses, I have three 10:37
6 witnesses who are available to give evidence today, but
7 for various reasons relating to work can only give
8 evidence at specific times, and it is probably helpful
9 that I tell you about that now.

10 CHAIRPERSON: Please do. 10:37

11 MR. McDOWELL: So one of them is Dr. Lee, who you have
12 heard about, he worked with witness A in Mayo. He is
13 available to give evidence I think any time until
14 2 o'clock. And I was going to suggest that he would
15 give evidence at half 12. He will be a very short 10:38
16 witness.

17
18 Then there is Claire Cullen, who the Committee has also
19 heard about, and I think she is available to give
20 evidence -- she is available to give evidence between 10:38
21 half 12 and 2, so we were going to suggest 1 o'clock
22 for her.

23
24 And then there is another short witness called Shane
25 Russell, who I think is available to give evidence at 10:38
26 half one. So I know that goes over the lunch break,
27 but I was going to suggest lining up those three
28 witnesses.

1 Now, I should say that I might be doing well to have
2 witness A completed by half 12. So we might just have
3 to see how we go maybe, but...

4 CHAIRPERSON: Can I ask the last name you gave, Shane?
5 MR. McDOWELL: Shane Russell. You will hear about him 10:38
6 this morning.

7 CHAIRPERSON: He is a doctor also, is he?
8 MR. McDOWELL: He is.

9 CHAIRPERSON: So the Committee was really anxious not
10 to add any further inconvenience, and we really do 10:39
11 appreciate the efforts that the witnesses have -- the
12 disruption to their clinical service, and that's what
13 we would like to minimise. We are happy to work with
14 you as much as we can to minimise any disruption. So
15 let's proceed with witness A and... 10:39

16 MR. McDOWELL: I mean if Dr. Chughtai is -- I mean
17 subject to the Committee, if Dr. Chughtai isn't here,
18 when it gets to close to half 12, and if I am not
19 finished with witness A, we could pause witness A, take
20 those three witnesses and then go back to witness A. 10:39
21 But maybe we should just take it as it comes.

22 CHAIRPERSON: Yes, let's see how we proceed. We are
23 happy to try to accommodate, and thank you all for your
24 patience.

25 MR. McDOWELL: Thank you. So I will recall witness A 10:39
26 please.

27 MS. HORAN: Just to check, this witness is already
28 sworn in, so there won't be a need to swear her in
29 again.

MR. McDOWELL: Yes.

1
2
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29

1 WITNESS A, HAVING ALREADY BEEN SWORN, CONTINUED TO BE
2 DIRECTLY EXAMINED BY MR. McDOWELL, AS FOLLOWS:

3
4 MR. McDOWELL: Good morning, witness A.

5 A. Good morning.

10:40

6 Q. So the last thing we discussed yesterday was the Hushed
7 website, and a text you had received in 2017 in
8 relation to that website.

9
10 The next document I would ask you to look at is at tab
11 48 of the book, if that could be put on screen please.
12 So could you tell the Committee what that document is?

10:40

13 A. So that's another text message that I received from
14 another number that wasn't in my phone, that I would
15 suspect came from Dr. Chughtai.

10:40

16
17 At the time I was actually working in Dublin, so it
18 wouldn't have been somebody that I was in contact with
19 for the previous 11 months, you know, and I was keeping
20 updated on my life. So I suspect that that could come
21 from him as well.

10:41

22 1 Q. Yes. Do you know -- sorry, just for the transcript,
23 that's a text that comes on 12th June 2018 at 12
24 minutes past 12 from an 086 number, and it says:

25
26 "Galway lady at work."

10:41

27
28 So, do you know anything about the phone number from
29 which that text message was sent?

1 A. No, I mean aside from the fact that it looks like an
2 Irish number, no.

3 CHAIRPERSON: Sorry, can I just interrupt at this
4 point, I am just mindful of the fact that if
5 Dr. Chughtai was here he might raise an objection at 10:41
6 this point to say you are asking the witness to
7 speculate on the origins of this text message.

8 MR. McDOWELL: Yes, and I am conscious of that, chair.
9 I suppose the witness's evidence is that the -- I am
10 only asking the witness to give evidence as to what she 10:42
11 knows about the phone number, and I think she said she
12 doesn't know anything about it.

13 CHAIRPERSON: Okay.

14 MR. McDOWELL: Her evidence is -- witness A can give
15 whatever evidence she wishes, but I think her factual 10:42
16 evidence is confined to the fact that she received this
17 text message on that date from that number.

18 2 Q. And I think, witness A, you have expressed a belief
19 that that came from Dr. Chughtai, but is there anything
20 else you want to say about the basis for that belief? 10:42

21 A. I don't think anyone else would say something and not
22 follow it up or, you know, just kind of make a random
23 statement like that, you know. It is kind of unusual
24 to just say that and leave it at that. And that again
25 kind of just reminded me of the prior messages, it 10:42
26 just -- I had the same sense that it was somebody who
27 was kind of from afar kind of keeping a tab on me or
28 that. So the only person I can think of is
29 Dr. Chughtai.

1 3 Q. Yes.
2 CHAIRPERSON: But again if I can just interrupt just to
3 say, I understand that text messages like this must be
4 very triggering for you, witness A, but I think you are
5 clear that you don't know that number, you don't know 10:43
6 that number to be Dr. Chughtai's, and all we are doing
7 now is speculating of the origins of this.
8
9 So not wishing to diminish your evidence, but it is, I
10 think, I would suggest, if Dr. Chughtai was here and 10:43
11 represented he might just ask the question, why are we
12 asking this witness to speculate.
13 MR. McDOWELL: Yes.
14 CHAIRPERSON: You can confirm you have received that
15 text message is the height of it? 10:43
16 A. Yeah, yeah.
17 MR. McDOWELL: And ultimately, chairperson, I accept
18 that to prove the case, the Committee must be satisfied
19 that Dr. Chughtai did in fact send that text, and I
20 will come to that. And obviously in due course there 10:43
21 will be submissions about that, but the evidence is
22 what the evidence is.
23 CHAIRPERSON: I will let you continue. Thank you.
24 MR. McDOWELL: Thank you.
25 MS. DEVINS: Chairman, may I interrupt for a second? 10:44
26 As I indicated my connectivity is wobbling, so if I
27 stop my video with your consent and that of all the
28 parties that usually helps.
29 CHAIRPERSON: I am happy for that to happen,

1 Ms. Devins, I note the connection issues that you have.
2 MS. DEVINS: Thank you.

3 4 Q. MR. McDOWELL: So that text message that we just looked
4 at was received on 12th June 2018, isn't that right?
5 A. Yes. 10:44

6 5 Q. So then what is the next significant event in the
7 narrative?
8 A. So essentially then I moved back to Galway, and I was
9 working there for 12 months. So I moved back in July
10 of 2018. And then in May 2019, I was at home outside 10:44
11 of Galway, and I actually was having a nap and I got a
12 phone call from a missed -- an unknown number, and I
13 answered. I thought it actually was my dad at the time
14 and I just said, hello, hello, and then I realised
15 nothing was happening so I hung up. And later on I 10:45
16 went out and --

17 6 Q. I might just ask you to pause there for a moment,
18 witness A. I wonder could tab 49 be brought up on the
19 screen please? So could you tell the Committee what
20 document we are looking at here? 10:45
21 A. So that's a screenshot of my phone that shows that
22 phone call, that it was an incoming call essentially
23 from an unknown number. And after I just answered it,
24 I hung up fairly quickly.

25 7 Q. Yes. And did anybody, did the person at the other end 10:45
26 of the phone say anything to you?
27 A. No, there was absolute silence. So I thought perhaps
28 it could have been, like, you know, a situation where
29 somebody was trying to get through to me. Initially I

1 thought it was my dad, and he was actually in the house
2 later on and I asked him had he phoned me, and he
3 hadn't.

4 8 Q. Yes, and that's at 4:33pm on 18th May?
5 A. Yeah. 10:46

6 9 Q. Yes. Could I then ask, or maybe I can control the
7 TrialView screen. So if I could then ask you to,
8 moving to the next page, could you tell the Committee
9 what this document is?

10 A. So essentially shortly after that missed call I got 10:46
11 this message saying:
12
13 "Still same no change voice bit better!!! It doesn't
14 cost to reply...".
15 10:46

16 And like straight away I thought that was very unusual.
17 I didn't recognise the number, but I suspected that it
18 could have been from Dr. Chughtai. So I knew that at
19 that stage it was probably important to ascertain who
20 the person was, so that's why I replied: 10:47
21
22 "Who is this?"
23

24 10 Q. Yes. So maybe for the transcript I will just read --
25 so this is a WhatsApp message you received, I think. 10:47
26 And for the transcript I will just read what it says.
27 So the sender says:
28
29 "Still same, no change voice bit better!!! It doesn't

1 cost to reply...".
2
3 And the next message says:
4
5 "Wanna meet you."
6
7 And then I presume that's you replying on the
8 right-hand side?
9 A. Yes.
10 11 Q. And you say: 10:47
11
12 "Who is this?"
13
14 And the response is:
15 10:47
16 "Does it matter. Where are u nowadays. Wanna meet
17 today. I don't bite."
18
19 And you write back saying:
20 10:47
21 "Who is this?"
22
23 And then the response is:
24
25 "Guess, Witness A grow up. I will wait for your reply, 10:47
26 let me know. I am in Galway if you want to meet till
27 tomorrow. See u bye."
28
29 And you rely:

1 "Is this Hassaan?"
2
3 And the response is three emojis with a halo and a
4 smiley face. And then it says:
5 10:48
6 "Will talk you later."
7
8 So is there anything you want to say about those
9 messages?
10 A. So essentially, like, straight you away I thought it 10:48
11 could be him, but I knew that it was important that
12 whoever was writing these messages be very clear of who
13 it was, because obviously I had received them
14 previously, and it became apparent that it was
15 important to know who it was coming from. But 10:48
16 essentially I blocked the numbers then that these
17 messages were coming from.
18 12 Q. Yes. Can I ask you, in the messages that are on the
19 screen at moment, the doctor -- sorry, the sender says
20 that they are in Galway if you want to meet tomorrow. 10:48
21 And were you in Galway at that time?
22 A. Yes, so I was living in Galway, but that was a Saturday
23 and actually I was in a different county. I was in my
24 parents' house. And essentially I went out to the
25 kitchen to them and I said, look, it is happening 10:49
26 again, like, these messages are coming again. And even
27 when I was with them, the phone was going off with
28 other messages --
29 13 Q. Yes.

1 A. -- and calls and things.

2 14 Q. And is there any reason that Dr. Chughtai would know,
3 would have known at that time that you were in Galway?

4 A. I honestly don't know how he could know that, because
5 at that point I had -- you know, so my intern year was 10:49
6 Galway, Mayo, and then I lived in Galway for 12 months,
7 and then I moved to Dublin, and then I moved back to
8 Galway. So I was moving around. So I don't know how
9 he knew that I was still there, or it was an
10 assumption, I don't know. 10:49

11 15 Q. Yes. Then I am going to bring you to the next
12 document. Could you tell the Committee what this
13 document is?

14 A. So this is another screenshot of another phone call
15 later that day. I didn't answer that phone call, 10:49
16 because I knew at that stage it wasn't my dad calling.

17 16 Q. Yes. And was that a missed call in the sense that you
18 actually missed the call, or is it a missed call in the
19 sense you chose not to answer the call?

20 A. I chose not to answer it. 10:50

21 17 Q. Yes. And then I am going to bring you to the next
22 document, so could you tell the Committee what this
23 document is?

24 A. So these are more phone calls from another number. The
25 number just said 001, there was nothing else. So I 10:50
26 knew again that this was a very unusual number and I
27 didn't, I didn't answer those calls. But at that time
28 I was with my family, and they could also see the calls
29 coming through.

1 18 Q. Yes. And the date is 19th May '19, so that's the
2 following day?

3 A. Yeah.

4 19 Q. Yes. And the time of those calls is 7:09 and 7:10pm.
5 A. Yeah, so at that stage I was getting ready to leave 10:50
6 where I was and go to Galway, it is about a three or so
7 hour journey, and I was extremely anxious. I was
8 terrified to go back to Galway and have to get out of
9 my car and walk into my apartments, because I didn't
10 know what I was going to encounter. I was -- I can't 10:51
11 explain the amount of fear that I had knowing that he
12 thought I was in Galway.

13 20 Q. Yes. And then if I go to the next document, can you
14 tell the Committee what this document is?

15 A. So these are more text messages. I believe that they 10:51
16 are on 19th May as well, but essentially I blocked his
17 number. So he is saying, how many numbers will you
18 block? And then he corrected me on the spelling of his
19 name. As I said before, I didn't actually know his
20 second name until this complaint arose later on after 10:51
21 these messages.

22

23 So my understanding was that that first spelling was
24 his name essentially. And then he asked if I had any
25 sister and: 10:52
26

27 "If I don't give line I will flirt with her happy."
28

29 Like, that again I found extremely chilling, because it

1 was like he was willing to continually -- when I
2 blocked his numbers continually get new numbers. Like
3 it is now three years since the initial incidents. He
4 has been told by HR and by the consultant, and also I
5 texted him that the guards also didn't approve. And he 10:52
6 is not only sending more messages, but he is also
7 saying, look, it doesn't matter if it is you or someone
8 else, I will just happily, you know, take whoever is
9 there, which I found really chilling.
10
11 He also mentions "Roisin Dubh", which was essentially
12 I'd say less than 200 metres away from the place that I
13 was living.
14 21 Q. That's a pub in Galway?
15 A. It is a pub, yeah. 10:53
16 22 Q. And because the version on the screen is quite faint,
17 are you able to say the date and time that these
18 messages were sent?
19 A. So it says yesterday at the top, and I think I took
20 that screenshot around the time that -- it was either 10:53
21 19th or 20th May, but I think I took the screenshots
22 when I realised I was going to the guards.
23 23 Q. Yes.
24 A. And I kind of understood that he was very close to
25 where I was living, so I could be incorrect in regards 10:53
26 to 19th, but it is either 19th or 20th.
27 24 Q. Yes, and just for the -- and sorry the number at the
28 top you will see begins +1325, does that number mean
29 anything to you?

1 A. So I didn't know at the time, but after the guards told
2 me that he was buying numbers. And then I looked back
3 into my phone and I saw the Hushed app, that that also
4 correlates with previous numbers that he has used, and
5 also potentially something he could have brought from 10:54
6 that app.

7 25 Q. Yes. And just for the sake of the transcript I will
8 read the messages. So the messages say:
9
10 "Ok how many u will block. I am not Hassan...", spelt 10:54
11 with one A, "...okay correct spelling is Hassaan...",
12 with two As, "...btw do u have any sister if u
13 don't give line I will flirt with her happy."
14
15 Next message says:
16
17 "Do u really hate me???"
18
19 The next message says:
20
21 "I don't believe." 10:54
22
23 The next message says:
24
25 "Can we meet in Roisin Dubh." 10:54
26
27 And the next message says:
28
29 "One last time."

1 what is the reference in the first line of the first
2 message to the word "block"?

3 A. So as I said, I was getting so many different numbers
4 and text messages from different numbers over the three
5 years that I blocked all the numbers. And every time I 10:54
6 blocked a number, a new number would come up.

7 26 Q. Yes. And then if I bring you to the next page, could
8 you tell the Committee what this document is?

9 A. So it is another missed call from an unknown number on
10 19th May. 10:55

11 27 Q. Yes, at 19 minutes past 7?

12 A. Yeah.

13 28 Q. And again, is this call that you intentionally or
14 unintentionally missed?

15 A. I intentionally missed it because I assumed it was him, 10:55
16 and that's a screenshot from my phone.

17 29 Q. Yes. Then if I could bring you to the next document,
18 could you tell the Committee what this document is?

19 A. So this is another text message on 19th May,
20 essentially it is from a number that I later became 10:55
21 familiar with, and it became clear that it was from
22 Dr. Chughtai because he referenced his name to other
23 people with that number, but I didn't have it in my
24 phone at the time. And essentially --

25 30 Q. That's an Irish number that begins 089? 10:56

26 A. Yeah.

27 31 Q. Yes. And if I could interrupt you for a moment to
28 mention to the Committee that that number is the number
29 that appeared on the printout from St. George's

1 Hospital this morning where Dr. Chughtai's phone number
2 was listed, that number was given.

3
4 So for the sake of the transcript, witness A, the
5 message that's sent on the Sunday says -- so your
6 evidence is that this was sent on 19th, is that right?

10:56

7 A. Yeah.

8 32 Q. And the message says:

9
10 "Witness A I am sorry I don't know when I heart you
11 so much that u start hating me so much I just don't
12 want to lose my good colleague... Anyhow your choice I
13 am in Roisin Dubh and leaving now and will come
14 tomorrow here at 7 to 10. If you get time just think
15 about coming. Take care yourself."

16
17 So is there anything else you want to say about that
18 message, witness A?

19 A. Again it became fairly obvious that he was very close
20 to my house, and I was absolutely terrified. He then,
21 you know, started saying things like "I heart you" and,
22 you know, saying "my good colleague", you know, these
23 are things that I suppose it is hard -- like,
24 essentially they are just completely out of left field,
25 like, you know, completely not wanted. And, you know,
26 these are new references to, I suppose, understanding
27 why he continually messaged me. And it was just a
28 little bit -- I felt very uneasy knowing that he had
29 these feelings.

10:57

10:57

1 33 Q. Yes. And then even though we are going slightly out of
2 the sequence, the next message from the same number is
3 -- sorry, could you just tell the Committee what's on
4 the next page, sorry?

5 A. I think it is a link to an event at Roisin Dubh. 10:58

6 34 Q. Yes.

7 A. I did click into it at the time, but it was some kind
8 of -- because the Roisin Dubh would be very well known
9 for gigs and things, but I think it was some kind of
10 like promotion for some event, but I can't recall what 10:58
11 that was.

12 35 Q. Yes. So that was sent the following day?

13 A. Yeah, so at this stage I was actually at work, and I
14 remember I was with my colleagues and a patient and
15 started to get like really, really anxious and afraid, 10:58
16 because the messages weren't stopping.

17

18 Now, at this point I had decided that there was no
19 point in blocking the numbers, because so many numbers
20 just kept coming up, and I just -- I had at that point 10:58
21 decided that once I had finished work that I would
22 probably be reporting him to the Gardaí.

23 36 Q. Yes.

24 A. So I just left it there, because also at this point I
25 realised he was referencing the Roisin Dubh, and it was 10:59
26 so close to my house, that if he started referencing
27 another area that he was coming to the hospital or
28 something like that, then at least I would have a heads
29 up, because Galway is quite small and I would have been

1 walking from the hospital to the apartment, you know,
2 so I was kind of -- I didn't -- to be honest I didn't
3 know what to do at that point, but I didn't block it.
4 37 Q. Yes. And then if I could bring you to the next page,
5 can you tell the Committee what this is? 10:59
6 A. So this is the same number, but it is going on to a
7 WhatsApp, and it is more messages kind of pressurising
8 me to come to the Roisin Dubh and --
9 38 Q. And for the sake of the transcript, they say, there is
10 two messages, the first says: 10:59
11
12 "Witness A, u will come sure!!! Plzz just for few
13 minutes."
14
15 And the second message says:
16
17 "Plzzz Witness A do come. I am there plz confirm."
18
19 And what date were those messages sent on?
20 A. That would have been 20th May, I am unsure of the time, 11:00
21 but it would have been somewhere between 3 o'clock and
22 7 o'clock in the afternoon.
23 39 Q. Yes, okay. So what did you do then having received
24 those messages?
25 A. So I actually, because I was with a male colleague I 11:00
26 said, you know, to them that I was concerned, I didn't
27 know whether he might turn up there. And they also
28 kind of encouraged me to go to the Gardaí. And
29 essentially I went straight after work to the Gardaí.

1 And when I was there, they brought me into an interview
2 room, and as I was talking to them and telling them
3 what was going on, you will see that my battery
4 actually was low, it was 7%, and it was being charged,
5 so this could actually have been in the Garda station, 11:01
6 because essentially I had to plug my phone in while I
7 was talking to them. And as we were talking, these
8 messages were coming through.

9
10 So, you know, they were like, oh, so he is literally 11:01
11 just texting you right now? And I was like, yeah, I
12 think he is actually in the Roisin Dubh. So for those
13 of you who don't know Galway, the Roisin Dubh is very,
14 very close to the Millstreet Garda Station, and I was
15 in the Millstreet Garda Station. So they suggested 11:01
16 calling that number.

17
18 And essentially they told me, I think it was initially
19 Garda McPartlan, and there was a detective there as
20 well at the time, but I think Garda McPartlan said 11:01
21 essentially that, you know, he was going to give them a
22 call and it was highly unlikely that he would come down
23 to the Garda Station voluntarily, but that he would
24 certainly hope that, you know, by making that phone
25 call, it would spook him enough that he would stop 11:02
26 doing it.

27
28 But actually he came back in a few minutes later after
29 making the phone call outside and he said that he was

1 on his way back down and that I was to stay in the
2 interview room, and that they were bringing him to the
3 interview room upstairs.

4
5 He then went out and the detective stayed with me and 11:02
6 asked me more questions and then let me go. And then I
7 left, and I understand that they interviewed him.

8
9 Sorry, just before I left, they did say that he had
10 admitted to texting me. He had admitted to buying 11:02
11 numbers with an app and, you know, that they asked him
12 to delete my number and to leave me alone.

13
14 But I think they went into a good bit of detail with
15 him at that point. So I left the station at that 11:02
16 point, but he was still being interviewed.

17 40 Q. Yes. And I am going to come to the Garda statements in
18 a moment, but what did you do after you left the
19 station?

20 A. So I actually lived in an apartment that overlooked the 11:03
21 car park of the Garda station, like, there is a Garda
22 station car park and then our apartments. And my two
23 friends and I were there, and obviously I was very
24 shook, I was in a very anxious state, and they were
25 consoling me. You know, I told them that he was 11:03
26 supposed to be in that Police station or Garda station,
27 so essentially we were just in our sitting room and we
28 could actually see when he left [inaudible - lost
29 connection] I haven't seen him since, or -- like

1 between now and 2016 that's the only time I've ever
2 seen him.

3 41 Q. Sorry, maybe this didn't happen for anybody else, by
4 the for me your connection dropped momentarily. So I
5 think that you said that your friends were consoling 11:03
6 you, and then you said that you saw -- you think you
7 saw the doctor. Could you just repeat that evidence?

8 A. Yes, so the three of us were in the sitting room, which
9 had a large window on to look at the entrance to the
10 Garda station, and we could actually see Dr. Chughtai 11:04
11 leaving. So at that point I was absolutely sure that
12 it was him that was sending the messages and that he
13 was involved.

14 42 Q. Yes. And when you saw him from your apartment, how
15 sure are you that it was him? 11:04

16 A. 100% sure, yeah.

17 43 Q. So I wonder now if TrialView could put the book of
18 Garda statements up on to the screen.

19 CHAIRPERSON: So while that's happening, for my
20 records, accepting these as Exhibit 11. 11:04

21 MR. McDOWELL: Thank you.

22 MR. MURRAY: Sorry Mr. McDowell, could you confirm if
23 it is a tab in the Core Book or a separate document?

24 MR. McDOWELL: It is a separate -- so there are eight
25 Garda statements in total, I don't know if they are in 11:05
26 a separate book or if there are eight separate tabs.

27 MR. McGUINNESS: Chairman, could I just raise a legal
28 issue?

29 CHAIRPERSON: Please do.

1
2 LEGAL ADVICE BY MR. MCGUINNESS:
3

4 MR. MCGUINNESS: I am not sure how far Mr. McDowell
5 intends to go, obviously he is entitled to get Witness 11:05
6 A to prove the making of her own statement. I am not
7 sure how much the rest would be hearsay on her part at
8 this point. I simply just raise it in the context of
9 what the doctor has sent in the messages about the
10 Garda statements. And he may have some legal objection 11:05
11 to his own one, which may have to be dealt with at some
12 stage. But Mr. McDowell might perhaps clarify the
13 purpose and the extent to which he is going to open
14 these at this moment.

15
16 SUBMISSION BY MR. McDOWELL:
17

18 MR. McDOWELL: Yes, so first of all -- so there is an
19 index of the Garda statements before you, Committee
20 members, and you will see that the first -- sorry, you 11:06
21 will see that the first six of them were taken by Garda
22 Kevin McPartlan. So Garda McPartlan is going to give
23 evidence to prove the taking of these statements.

24
25 In respect of witness A, obviously she can prove that 11:06
26 she spoke the words contained in the statements. And
27 in respect of the statement given by Dr. Chughtai to
28 Garda McPartlan, we say that that clearly constitutes
29 an admission against interest and that it certainly

1 falls within that exception.

2 CHAIRPERSON: Can you assist us, Mr. McGuinness, any
3 further follow-up question or direction you might wish
4 to give to us?

5
6 LEGAL ADVICE BY MR. MCGUINNESS:

7
8 MR. MCGUINNESS: Obviously, chairman, I haven't read
9 the statements. It is helpful for Mr. McDowell to make
10 that case, because obviously admissions, insofar as 11:07
11 they may be admissions, now they may be interpretations
12 that the doctor would want to put upon them, or contest
13 that they are his. But if they are prima facie
14 admissions recorded in writing, it is an exception to
15 the hearsay rule, and certainly it is appropriate for 11:07
16 the evidence to be led at an appropriate stage.

17
18 SUBMISSION BY MR. McDOWELL:

19
20 MR. McDOWELL: And I do appreciate, Committee members, 11:07
21 that -- obviously Garda McPartlan isn't here to prove
22 the statements, he is not proving the statements now,
23 and to some degree I am interposing these statements
24 into Witness A's evidence. But I am doing that because
25 she is telling her story, and I think it is helpful if 11:08
26 the Committee sees the events in a single sequence,
27 rather than me jumping back and forward between
28 witnesses across the narrative. So that's the reason I
29 am proceeding in that way.

1
2 WITNESS A CONTINUED TO BE DIRECTLY EXAMINED BY MR.
3 McDOWELL AS FOLLOWS:
4

5 44 Q. MR. McDOWELL: I am going to go to the first witness 11:08
6 statement in the Garda statement in the booklet. This
7 is, I think, your statement, witness A. Have you seen
8 this since you gave it?

9 A. I did, yeah.

10 45 Q. Yes. So for the sake of the transcript I am going to 11:08
11 read out what it says. So at the top it says:

12
13 "Statement of Witness A", and an address is given and a
14 date of birth is given and a telephone number is given.
15 And it says: 11:08

16
17 "Occupation: Doctor. Taken on 20th May '19 at Galway
18 Garda Station by Kevin McPartlan, Garda, Galway Garda
19 Station."
20 11:08

21 And the statement says:
22

23 "My name is Witness A, I am a doctor in Plastic Surgery
24 in Galway Hospital. On 18th May I received a phone
25 call from an unknown number that I thought might be my
26 father. I answered and there was silence. I said
27 Hello twice and the caller hung up. I didn't think a
28 lot about it until I received a text at 5:36 from
29 +1(347) and when I read it I recognised the wording to

1 be similar to the texts I received from a male doctor
2 named Hassaan Affa Beg Chughtai, who I had difficult
3 within Mayo in 2016. I blocked that number.
4

5 "Later on I received two missed calls from an
6 unidentified number and I got text message from an
7 international number +1(352) and I again recognised the
8 message to be from Hassaan. I also blocked this
9 number. I pretty much straightaway I got another text
10 from an Irish number 089 and it was Hassaan texting me
11 to meet in Galway. I don't know how he knows I'm in
12 Galway but it is not normal to have any communication
13 from him. As I have said I had problems with him in
14 the past and I thought he had got the message to leave
15 me alone since I had involved HR at work and told him
16 directly to leave me alone.
17

18 "Later again I got another text message and calls. The
19 problem I had in 2016 with Hassaan in Mayo was that I
20 had very little contact with him but he took this
21 contact to be a sign that somehow I was interested in
22 him romantically which was not the case Whatsoever. It
23 was evident to my work colleagues at this time that
24 this was also the case. I worked in Castlebar Hospital
25 as an Intern from January 2016 to July 2016. Hassaan
26 was a Registrar at that time and he would have been a
27 Senior colleague. There were teams of five him being
28 no. 2 and me the Junior at no 5. Toward the end of
29 March Hassaan began to act strange and I received some

1 strange phone calls from him and texts. This all
2 culminated at some time in April when he text me and
3 asked me to marry him, which made me realise that the
4 previous messages and calls were very troubling. His
5 tone was that he was alone in the country and he was
6 depressed and he was half trying to guilt me into being
7 nice to him or pay him more attention.

8
9 "At this stage I raised the problem with senior staff
10 and HR and they immediately made him aware that his
11 communication was inappropriate and they met with him,
12 He asked to apologise to me at their meeting but I
13 declined this. The communication eased off for a month
14 or two and we passed by in the building without any
15 problems. Towards the end of my time there, there were
16 another few strange meetings in corridors where he
17 appeared where I was and he really didn't need to be
18 there and he always asked to go for tea and I always
19 told him no. I finished in Castlebar Hospital around
20 July 2016.

21
22 "I think in May 2016 I lost my phone in Dublin which
23 had the messages on it. I didn't hear from Hassaan
24 until the 31st of March 2017 and I received a few calls
25 and texts from him again. I blocked those numbers and
26 I got a long message from him again on a different
27 number and I went Gardai in Galway. The Garda told me
28 to text him to stop which I did and then I didn't have
29 any further communication from him until the text

1 messages I received on 15th of May 2019 when he wanted
2 to meet in Galway which completely terrified me and I
3 couldn't go back to the house for fear he was nearby.
4 All along this stuff with Hassaan, my life is full of
5 what ifs and is he capable of doing something worse or
6 following me home; My other big worry is if he is doing
7 this to anybody else who might not be able to stand up
8 to him. At no stage did I encourage or give my consent
9 for Hassaan to continue to text me continually without
10 stopping when he was asked to quit and leave me alone.

11
12 "This text messages I received I have taken screen
13 shots of them and I will forward them to Garda
14 McPartlan.

15
16 "This statement has been read over to me and it is
17 correct. I do not wish to make any additions or
18 alterations."

19
20 So is there anything else you want to say about that,
21 Witness A?

22 A. So, like, I actually gave a very lengthy account, and
23 obviously some of it is a little bit slightly
24 paraphrased, but I was happy that the general gist of
25 it was correct. So I mean when it says that I was
26 terrified to go back to the house, I was terrified to
27 go back to the house, but I did arrive in Galway that
28 Sunday evening, just to clarify that.

29 46 Q. Yes. I am then going to go to tab 4 of the book, page

1 14. So this is a memo of an interview that
2 Dr. Chughtai gave to Garda McPartlan on the same date,
3 and I am going to read that in a moment, but have you
4 seen this document before, Witness A?
5 A. No. 11:13
6 47 Q. So it says:
7
8 "Voluntary caution memo of Hassaan Affa Beg
9 Chughtai...", of an address given. And it is says:
10
11 "Taken by Kevin McPartlan, Garda, on 20th May 2019." 11:13
12
13 And the interview goes as follows:
14
15 "Q. Do you understand the caution?
16 A. Yes.
17 Signed: Hassaan Affa.
18 Witnessed: Kevin McPartlan Garda.
19 Q. Hassaan, are you here of your own free will?
20 A. Yea.
21 Q. Are you happy to speak to now without a solicitor?
22 A. Yea.
23 Signed: Hassaan Affa.
24 Witnessed: Kevin McPartlan Garda.
25 Q. Hassaan, what is your phone number?
26 A. A number beginning with 089...", and that's the
27 number I mentioned a moment ago, Committee members.
28 "Q. Hassaan, do you have sole possession of your phone?
29 A. From last Friday yes I have the phone sometimes. I

1 leave it with my Secretary but I have it since Friday
2 all the time.

3 Q. Have you used the phone to text anybody you would
4 not normally contact this weekend?

5 A. Yes Witness A.

6 Q. What did you text her?

7 A. I just invite her for a Program at the Roisin Dubh.

8 Q. Have you other phones?

9 A Currently I have a phone but I haven't used it for a
10 year.

11 Q. What number is it?

12 A. A number beginning with 083...", and just to pause
13 there, that's the number that the Committee will have
14 seen in respect of the text to Claire Cullen.

15
16 "Q. Have you any foreign numbers?

17 A. I had in the past but I have no recollection.

18 Q. Why would you text Witness A out of the blue?

19 A. Well I came to the Galway for some other business
20 and we have some grievance and I want to clarify those
21 grievance.

22 Q. What grievance are they?

23 A. Misunderstanding in the past that we had exchange of
24 words that should not happen harsh words and I want to
25 clarify them.

26 Q. What kind of words were said?

27 A. I don't recollect now but we were not talking to
28 each other.

29 Q. When people don't talk this is usually a reason.

1 Would it be fair to say Witness A didn't want to speak
2 to you?
3 A. I don't know.
4 Q. When did you last speak in person?
5 A. I don't remember exactly.
6 Q. Roughly?
7 A. Maybe 2016, I don't remember exactly.
8 Q. That is a long time ago what did you both say there?
9 A. Well it's very hard to remember but we ended in a
10 not good how you say I just feel guilty and I want of
11 reconcile.
12 Q. Did Witness A tell you to leave her alone?
13 A. She never used this word.
14 Q. Did she convey to you that she did not wish to
15 contact you or see you?
16 A. I have very vague remember of 2016 but she say
17 something like that. I don't remember.
18 Q. You don't have to remember exact words verbatim but
19 were you aware that you should not contact her?
20 A. She was angry at that time and it is usually
21 temporary and I feel I will resolve in time.
22 Q. How many times did you text her this weekend?
23 A. Two by messages and two by WhatsApp and I change the
24 WhatsApp number to contact her again.
25 Q. So you didn't contact her any other way?
26 A. I tried to call her once.
27 Q. On your phone?
28 A. Yes.
29 Q. At number?

1 A. The same 083 number...", now just to pause there for
2 a moment. The number that I referenced earlier, the
3 089 number was 089-4080183, and what is written here is
4 083-4080183, so I am not making any further comment on
5 that.

6
7 "Q. I put it to you that she got text messages from you
8 on other numbers?

9 A. Ok on WhatsApp you can change your number every
10 single second, I use a Word system it was not on my bad
11 language.

12 Q. What do you mean use different numbers?

13 A. WhatsApp you are changing numbers.

14 Q. Why would you do this to Witness A?

15 A. Well I was emotionally involved with her.

16 Q. Surely this is not normal to keep changing your
17 number.

18 A. On WhatsApp, it is.

19 Q. On WhatsApp your doing it to upset her?

20 A. Yea but I didn't mean to upset her.

21 Q. Do you need help with your sense of right and
22 belong.

23 A. I have counselling in the past.

24 Q. What country are you from?

25 A. Pakistan.

26 Q. Any family, girlfriend?

27 A. Relationship in UK and it ended up 6-8 months ago
28 and trying to get into marriage but not arranged but it
29 ended.

1 Q. So now you start pestering Witness A again is that
2 no true?

3 A. I was trying to communicate with her to establish
4 communication.

5 Q. Why annoy her now?

6 A. Simply to establish communication if she text me no
7 stop I would stop immediately.

8 Q. I am telling you now that Witness A does not want
9 anything to do with you on any level. She is afraid of
10 you and your texting and phone calling. What do you
11 say to this?

12 A. I will not contact her again in anyway. I am sorry
13 for my behaviour.

14 Q. I am also telling you to not contact her friends or
15 colleagues to try to apologise in any way as this will
16 be seen as further efforts to contact Witness A?

17 A. Yes fine I understand.

18 Q. Has this voluntary caution memo been read over to
19 you?

20 A. Yea.

21 Signed: Hassaan Affa."

22
23 I appreciate that you have seen that document for the
24 first time, witness A, do you have anything that you
25 wish to say about it?

26 A. I mean knowing what happened after this, you know, it
27 is pretty obvious that it was spelt out to him there
28 that he shouldn't contact me. Also prior to this, it
29 was, he was told by Dr. Lee and I assume Ms. Kelly, and

11:18

1 I did text him twice, once when he was asking me to
2 marry him in 2016 to say, it is not appropriate and
3 don't send any more messages. I also communicated via
4 Ms. Kelly and Dr. Lee that I didn't want to meet him
5 for his apology. And also in 2017 I texted to say to 11:18
6 stop communicating with me because I was speaking to
7 the police.

8
9 So I think it was pretty clear that the only
10 communication, aside from when I asked him who he was, 11:18
11 was to tell him to stop communicating with me. So I
12 thought it would have been clear.

13 48 Q. Yes. At one point, about a third of the way down the
14 second page, he says that he was emotionally involved
15 with you. Is there anything you want to say about 11:19
16 that?

17 A. It is completely untrue. Whatever idea he had, it was
18 entirely unilateral. I had very little communication
19 with him. Like, I would have had, you know, cordial
20 relationships with the SHOs on the team and we would 11:19
21 have eaten lunch together, but I really didn't even --
22 I wouldn't even have called him an acquaintance, aside
23 from the fact that he was a colleague who I saw very,
24 very little of.

25 49 Q. Yes. And does that interview that we just read accord 11:19
26 with what Garda McPartlan said to you on 20th May about
27 his discussion with Dr. Chughtai?

28 A. Yeah.

29 50 Q. Yes. So then the next document I want to bring you to

1 is tab 7 of the book. And Committee members, to
2 orientate things, the evidence we have just heard
3 relates to witness A's complaint to the Gardaí in
4 Galway on 20th May 2021 about -- sorry, 20th May 2019
5 about Dr. Chughtai.

11:20

6
7 On 21st May 2019, so the following day -- sorry, if we
8 go back to the Garda statement book, maybe I wasn't
9 clear about that, sorry. I am sticking with the Garda
10 statement book for the time being.

11:20

11
12 On 21st May 2019, so the following day, Dr. Chughtai
13 made a complaint about witness A to the Gardaí in
14 Tullamore, and I am going to open that now. And this
15 will be proven in due course by Saoirse Noonan, who is
16 the Garda who took the statement. And have you seen
17 this document before, Witness A?

11:21

18 A. Yes, because I had to make a statement in response to
19 it.

20 51 Q. Yes, and we are going to come to that. So we see that
21 at the top it says:

11:21

22
23 "Statement of Hassaan Affa Beg Chughtai...", of an
24 address given to Saoirse Noonan of Tullamore, and it
25 says, for the transcript it says:

11:21

26
27 "My name is Hassaan Affa Beg Chughtai, I am a doctor
28 currently self-employed. I have my own company Affina
29 Ltd. I take medical practice contracts. In January

1 2016 I was working in Castlebar Hospital. There was an
2 intern working with me. Her name is Witness A. When
3 Witness A arrived she was constantly late for work and
4 not working to a proper standard. I made a complaint
5 about this to the consultant in the hospital. I was
6 her superior in work. She did not take this complaint
7 well and took it personally. After this she started
8 making intimidating facial gestures at me and I felt
9 she was ganging up against me and making me feel
10 isolated. I felt she was undermining my professional
11 job and not communicating with me. I felt completely
12 isolated and this had a strong emotional and physical
13 effect on me. I had trouble concentrate because of
14 this Witness A start sending me after work text
15 messages regarding behaviour and body language. I felt
16 she was purposefully standing near me and gazing at me.
17 This was distracting me and affecting mental health.
18 Both our contracts were up in July. We both left
19 Castlebar Hospital. I felt intimidated and Harassed by
20 Witness A. This all occurred in 2016 between January.
21 And July in Castlebar Hospital. In 2017, I missed
22 Witness A and contacted her via text message. I was
23 very depressed at the time and still on medication for
24 my depression.

25
26 "I asked her to meet up. She didn't reply. On 20th
27 May 2019, I was feeling very depressed and contacted
28 Witness A via text message. I invited her to a
29 function when she didn't reply I send more messages. I

1 was drunk yesterday and feeling depressed, that's why I
2 sent the messages. I feel okay now, over the weekend I
3 was drunk. On the last day in Castlebar, I felt
4 Witness A was following me and it was witnessed in work
5 as well. She was following me all day. I left work
6 early to avoid her, If you don't agree with Witness A
7 she's toxic and becomes very angry. This statement has
8 been read over by me and is correct."

9
10 So in a moment I am going to open the cautioned 11:23
11 interview that you gave, witness A, in response to
12 this, but I wonder do you want to make any comment
13 about that statement now?

14 A. So there is quite a few things that aren't correct
15 about that. There was no complaint, certainly that I 11:23
16 am aware of, that was made to Dr. Lee. If there was a
17 complaint, it certainly wasn't a formal one, or, you
18 know, he never told me that there was anything.

19
20 The fact that -- I definitely wasn't making any 11:23
21 intimidating facial gestures or trying to intimidate
22 him at all. I was a junior and I was very much
23 respectful of my senior colleagues up until the point
24 where he started texting me asking me to marry him and
25 meet him outside of work. And also when he was, you 11:23
26 know, distracted from the work that we had to do and
27 trying to get me away from it to talk to me about
28 whether Dr. Lee was angry at him or not.

1 I definitely didn't harass him. I did reply in 2017 to
2 say that I didn't want him to contact me and I had been
3 speaking to the police. And also... yeah, I have never
4 actually expressed anger towards him in person.

5 Obviously this process has caused me a lot of grief, 11:24
6 but I have never written any messages or communicated
7 anything to him in an emotive way.

8 52 Q. Yes. So what I am going to do now is bring the
9 Committee to the voluntary cautioned statement you gave
10 in response, and I think you gave this on 7th September 11:24
11 2019, is that right?

12 A. Yeah.

13 53 Q. So Committee members, just to orientate you, I am going
14 slightly out of sequence now in the narrative, but it
15 is just to keep this relevant evidence together. So we 11:25
16 see there at page 26 of this book there is a statement
17 given by you at Galway Garda station to -- sorry I am
18 struggling to get TrialView to stay on the right page.
19 There is a cautioned statement given by you to Garda
20 Máire McGrath at Galway Garda Station. 11:25

21
22 Can I just ask you before I read this out, how did the
23 give of this statement come about?

24 A. So essentially I, on 20th May 2019, left the Garda
25 station, and then the Gardaí were calling me to, you 11:25
26 know, ask me if I wanted to make a formal complaint.
27 And initially, you know, and press charges, and
28 initially I said I would hold off, but to myself I
29 said, if anything, anything at all happened that I

1 would proceed.

2 So then I got a notification later on, a few weeks
3 later to say that he had made this counter complaint
4 against me in Tullamore. So that actually was what
5 spurred me on to make a formal case with the Gardaí, 11:26
6 and also to report to the Medical Council.

7
8 So it was -- I had actually moved from Galway to Cork
9 in July, so I had to arrange a time when I was able to
10 come back to Galway to make the statement, and that's 11:26
11 why there is a bit of a delay in regards to that. But
12 at that stage the Medical Council complaints had kind
13 of started as well.

14 54 Q. Yes. So just to read this statement, there is some pro
15 forma questions about whether you understand the 11:26
16 caution and so on. We see that the statement was given
17 at 7:42 in the morning on 7th September 2019, and I
18 will just read it out, it says:

19
20 "Q. Witness A, is it fair to say you made a statement
21 of complaint to Garda Kevin McPartlan?
22 at Galway Garda Station on the 20th of May 2019
23 regarding the behaviour of a former colleague Dr
24 Hassaan Affa Beg Chughtai who was a senior colleague of
25 yours at Mayo University Hospital from Jan to March
26 2016?

27 A. Yeah.

28 Q. Garda McPartlan has made you aware that this person
29 made a statement regarding your behaviour during this

1 period on the 21st of May 2019 at Tullamore Garda
2 Station, is that correct?

3 A. Yes.

4 Q. I am now going to read the statement made by
5 Dr Hassaan Affa Beg Chughtai...".

6
7 And then she reads out the statement that I have just
8 read to you, witness A. And then at the bottom she
9 says:

10
11 "A. Do you wish to say anything in relation to this
12 statement read over to you?"

11:27

13
14 And it says:

15
16 "A. I was unaware of any grievances Dr. Hassaan...", I
17 am sorry about this, "...I was unaware of any
18 grievances Dr. Hassaan Affa Beg Chughtai..." --

11:27

19
20 CHAIRPERSON: Sorry, I think we need to get the
21 TrialView person to bring it to the screen. So as I
22 understand, the system reverts back after three
23 seconds, so it is not anything you are doing,
24 Mr. McDowell, I don't believe. So you are on page 27,
25 as noted there.

11:28

26
27 So for our TrialView colleagues, could you please
28 display page 27, it starts with "Do you wish to say
29 anything in relation to this statement read over to

11:28

1 you".

2 MR. McDOWELL: Thank you very much.

3 CHAIRPERSON: Thank you.

4
5 "A. I was unaware of any grievances Dr Hassaan Affa Beg 11:28
6 Chughtai had with my professional conduct prior to
7 receiving correspondence from the medical counsel on
8 Thursday. His statement refers to some of the issues
9 he mentioned in that complaint. As far as I am aware
10 my senior colleague and consultant Dr. Lee didn't have
11 issues regarding my professional conduct at that time.
12 Neither did my other two senior colleagues, Kamal
13 Mungar and Oisin O'Mongain. In regards to my behaviour
14 towards Dr. Hassaan, I never sought to intimidate him
15 or have a negative effect on his professional conduct.
16 During that three month period I was part of a team of
17 five listed above and I Was the most junior. I sought
18 direction from my senior colleagues and found the
19 majority of the time it came froth Dr. O'Mongain and
20 Dr. Mungar, if not directly from Dr. Lee. Dr. Lee
21 arranged a rota in January and I offered to type this
22 up. In March of 2016 I received a phone call from
23 Dr. Hassaan who was in Pakistan at the time asking me
24 for extra leave, which I was not in a position to give.
25 This was the first contact over telephone; outside of
26 work unrelated to any work issues. I subsequently
27 received many messages arid phone calls which were not
28 related to work and are in the possession of An Garda
29 Siochana. I have filed a complaint as I felt he was

1 harassing me following these unwanted messages. Both
2 Dr. Lee and HR were made aware of his behaviour and
3 they spoke to him, not in my presence. My
4 understanding was that he was asked to leave me alone.
5 I never intentionally made any facial gestures at Dr.
6 Hassaan. In July I did not follow him around. In
7 fact, I did my best to avoid him as we had no need to
8 contact in a professional capacity. In March/April
9 2017 I received further unwanted messages and I
10 responded with a text as instructed by Gardai informed
11 him that I had spoken to them and he wasn't to contact
12 me or I would have to take the matter further.
13 Subsequent to this Dr. Hassaan contacted me again in
14 May 2019, which I gave a statement regarding his
15 behaviour. It's been very intimidating and stressful
16 for me; I have not made any intentional contact with
17 him and I never initiated contact with him following
18 the matter being reported to H.R. He has reported me to
19 the Medical Council regarding allegations about my
20 health and professional conduct, which I am finding
21 profoundly distressing. I think this is a campaign of
22 harassment and intimidation against me by Dr. Hassaan.
23 The Medical Council have provided me with copies of
24 these complaints, which I now wish to hand over to An
25 Garda Siochana as evidence of the ongoing harassment."
26
27 And then you confirm you have read over that statement
28 and it is correct. So is there anything else you would
29 like to say about that statement, witness A?

A. I think, you know, it does show the point that essentially I felt that the statement he had made to Tullamore was essentially just more harassment. It wasn't, you know, it wasn't founded in anything true and it was just essentially to cause me more stress and to maybe try and prevent me from going ahead with the formal complaints.

55 Q. Yes. So then moving on, you made a complaint about Dr. Chughtai to the Medical Council on 26th June of '19, isn't that right?

A. Yeah.

MR. McGUINNESS: Chairman, might I just intervene there to offer some advice?

CHAIRPERSON: Please do, Mr. McGuinness.

LEGAL ADVICE BY MR. McGUINNESS:

MR. McGUINNESS: I just wanted to advise the Committee about the status of Dr. Chughtai's statement of complaint.

Now, unlike his statement made to Garda McPartlan in interview, which on its face appears to consist of, or contains admissions against interest and is there admissible, admissible of proof of the contents. The same is not the position with regard to a statement made outlining allegations against somebody.

So it is obviously admissible in the sense that witness

1 A is entitled to give her response to the allegations,
2 but the statement of allegations itself made by
3 Dr. Chughtai is not evidence of the facts therein.
4

5 He is of course entitled to attend and give evidence in 11:32
6 due course, and then the Committee will have to decide
7 about its status at that point in time, and obviously
8 that's a matter for him in due course.
9

10 But I thought I ought to just at this stage draw the 11:32
11 attention of the Committee to the legal difference
12 between the two statements.
13

14 SUBMISSION BY MR. McDOWELL:
15

16 MR. McDOWELL: Yes, and I will obviously defer to 11:32
17 Mr. McGuinness on questions of evidence, but I do
18 think, and maybe this is a sort of debate to be had on
19 another day, but the statement of complaint made by
20 Dr. Chughtai against Witness A contains several 11:33
21 assertions of fact which are evidence of the
22 allegations being made by the Medical Council, by the
23 CEO in this case.
24

25 So by way of illustration, he says that he texted 11:33
26 Witness A in 2017, which is one of the allegations we
27 make.
28

29 He says that he texted her on 20th May '19, which is

1 one of the allegations we make.

2
3 So, it is a statement that he made voluntarily to An
4 Garda Síochána, in which he says that he did the things
5 that we say he did. So I accept that it is not an 11:33
6 admission in the sense that an allegation wasn't made
7 and he confessed to it. But it is a statement against
8 interest insofar as that it is a statement he made
9 which is supportive of the CEO's case.

10
11 But I am not sure if -- in the absence of Dr. Chughtai,
12 I am not sure a full debate might need to be had on it.

13
14 LEGAL ADVICE BY MR. MCGUINNESS:

15
16 MR. MCGUINNESS: No, I respectfully agree with
17 Mr. McDowell on that point.

18 MR. McDOWELL: Thank you.

19 CHAIRPERSON: Thank you. So we will note
20 Mr. McGuinness' very helpful advice and take that into 11:34
21 consideration. So you may proceed, Mr. McDowell.

22
23 WITNESS A CONTINUED TO BE DIRECTLY EXAMINED BY MR.
24 McDOWELL AS FOLLOWS:

25
26 56 Q. MR. McDOWELL: Thank you. So, Witness A, as I was
27 saying, you made your complaint on 26th June 2019, and
28 you -- and I don't know if you were present yesterday
29 when I read that out to the Committee, but you gave a

1 sort of long written account of the matters that you
2 were complaining about, isn't that right?

3 A. Yeah.

4 57 Q. Yes. And Committee members, as I said to you
5 yesterday, an enormous amount of correspondence was 11:34
6 received from and on behalf of Dr. Chughtai in response
7 to that complaint over a period of several months, and
8 I don't propose to open all of it, particularly at this
9 juncture because there is, I am not sure that Witness A
10 can really give much evidence about it. But I do want 11:34
11 to open some of his responses to you at this juncture,
12 because I want to give Witness A an opportunity to
13 comment on them.

14
15 So if I could ask that tab 5 of the Core Book be 11:35
16 brought to the screen. So Committee members, this is
17 the first response received from Dr. Chughtai in
18 relation to witness A's complaint. It is an e-mail
19 dated 12th July of '19 to Mr. Smith, who is a Medical
20 Council employee. It says: 11:35

21
22 "Dear Mr. Smith

23
24 "I just quickly read complaint letter and I would like
25 to reassure Witness A that I will not show up in front
26 of her if she tells me where she is working as
27 currently I am sick and in Pakistan and will not be
28 able to come back at least for next two month. I
29 respect her wishes and would not contact her. Only

1 reason, I contacted her in May that I wishes to work in
2 Galway Hospital and I didn't want to take risk of
3 working in same building as I myself get very nervous
4 because of her reaction and body language and because
5 of that my mind stop concentrating and get confused. I
6 wish, if I ever been able to clarify misunderstanding
7 and normalize relation between me and her as it is very
8 painful for me and out of three option (showing same
9 emotion, ignoring and avoiding her, and try to
10 reconcile her on her terms as colleague) I chose third
11 option that caused distress to her. I sincerely
12 apologized her for causing this and reassure her I will
13 always respect her decision and maintain distance from
14 her.

15
16 "Thanks Hassaan."

17
18 Anything you want to say about that, Witness A?

19 A. Like, I find this very manipulative, because he is
20 saying in one sense, you know, that his intentions were 11:36
21 so that he would know where I was working so that he
22 could avoid running into me and causing distress, but
23 essentially the messages are pretty clear that he wants
24 to flirt with either me or my sister, that he hearts
25 me. You know, in the statement you just showed me from 11:37
26 the Gardaí about his emotional attachment to me.

27
28 You know on one end he is very, and it comes out in
29 later texts as well, that he very much has some sort of

1 emotional attachment and romantic ideas about his
2 relationship with me, but he is able to hide that to
3 authorities and say, you know, actually I was trying to
4 do the right thing, and I just find that extremely
5 manipulative and disturbing.

11:37

6 58 Q. Yes. The last line of that e-mail says:

7
8 "I sincerely apologized to her for causing this and
9 reassure her I will always respect her decision and
10 maintain distance from her."

11:37

11
12 And is that what happened?

13 A. No.

14 59 Q. And we will come on to that in due course. So then the
15 next tab is tab 6. So this is another response
16 received the following day, 13th July 2019, to
17 Mr. Smith from Dr. Chughtai, and it says:

11:38

18
19 "Dear Mr. Smith

20
21 "I am out of country and limited legal advice I had. I
22 have come to conclusion that Witness A has already
23 bring forward these issue once in MGH...", I think
24 that's Mayo General Hospital, "...and later at Garda
25 station and these issues were resolved and agreed by
26 both parties with no further action by both sides on
27 these particular concerns and my understanding is you
28 cannot trial/investigate a person for same issues again
29 and again by different authorities. I have strong

1 feeling that this complain could be part of conspiracy,
2 if seen in wider prospect as I have recently submit
3 complain against few of consultant and raise voice
4 against emotional abuse. Either way, this complain
5 might be use for dealing/blackmailing or simply
6 restricting my movement. The only new concern Witness
7 A has shown is she does not want me to appear in front
8 of her. If she want, I am happy to discuss solution
9 for this issue as well either directly or through third
10 person.

11
12 "Thanks Hassaan."

13
14 So is there anything you would like to say about that
15 witness A?

11:39

16 A. My only objective was to make sure that I didn't get
17 any communication from him and that he understood, you
18 know, not to reach out to me or anything like that.
19 But I was also getting very concerned that if someone
20 else, who was more vulnerable than I, you know, was, 11:39
21 you know, a patient or somebody who was unwell or
22 somebody who was taken by these kind of manipulations,
23 that they may not understand, you know, what was
24 happening. And I was just concerned that, you know,
25 this was a safety issue as well. So they were the only 11:39
26 objectives I had, I wasn't trying to conspire against
27 him, I was essentially -- I was concerned for my own
28 safety and wellbeing and potentially for others as
29 well, if he was doing the same behaviours to other

1 people.

2 60 Q. Yes. And there appears to be a suggestion that there
3 is a connection between your complaint and a complaint
4 that he made against consultants. Is there anything
5 you want to say about that? 11:40

6 A. I don't know anything about that complaint.

7 61 Q. Then the next document I want to bring you to is at tab
8 7 of the Core Book. So this is an e-mail sent by
9 Dr. Chughtai to Mr. Smith at three minutes past three
10 on 27th July, so about two weeks later, and it says: 11:40

11

12 "Dear Smith

13

14 "If Witness A want mediation I am happy to do it. I
15 think there are lot of misunderstanding. I am sick
16 won't be able to come but still I believe best way to
17 go forward is to set boundaries and communication is
18 key to solve all problem. I never said we had romantic
19 relationship I said she shows strong emotion (anger
20 hate, kindness, I don't use word love as it will again
21 provoke her). She cannot deny she herself showed
22 interest sometimes in past but we should live in
23 present and as she mentioned she doesn't want any
24 further contact which I am happy to accept and I would
25 be delighted if she mediates directly or by involving
26 third person as mature adult and we both live our life
27 happily without causing distress to any one.

28

29 "Thanks Hassaan."

1
2 So is there any reaction or comment you want to make
3 about that?

4 A. So at absolutely no time did I ever express any
5 interest in any romantic relationship or even a 11:41
6 friendship. Or, you know, I didn't even expect a
7 working relationship where I would be able to, you
8 know, have lunch and have a conversation for half an
9 hour with this person. There was literally -- there
10 was very limited interaction when we were working 11:41
11 together. And after that I wanted nothing to do with
12 him.

13
14 I don't believe I have ever shown any emotions directly
15 to him. Obviously I have been upset myself personally, 11:41
16 but I haven't expressed anything in written
17 correspondence to him directly. And it just shows me
18 his lack of insight and the fact that he is happy to,
19 you know, go on and live as adults, but also wants
20 mediation to confirm how we are going to go ahead. And 11:42
21 it is weighing more to this relationship than it needed
22 to be. Here was no -- I don't understand what
23 mediation would have done, because there was no
24 essentially relationship, there was no friendship,
25 there was nothing, so I don't know what a mediation was 11:42
26 going to do.

27 62 Q. Yes. And about two thirds of the way through that the
28 e-mail says:
29

1 "She mentioned she doesn't want any further contact
2 which I am happy to accept."
3

4 Is there anything you would like to say about that?

5 A. Yeah, so this is 2019, so he actually further reached 11:42
6 out in 2020, so that's not true.

7 63 Q. Yes. So Committee members, as I said, there are other
8 e-mails from Dr. Chughtai where he says other things
9 about witness A's complaint, but I don't want to spend
10 too long going through all of this. I just wanted to 11:43
11 give witness A an opportunity to comment on the earlier
12 reaction from Dr. Chughtai to the complaint.
13

14 The next thing that happened, I think, witness A, is
15 that Dr. Chughtai made a complaint about you to the 11:43
16 Medical Council, isn't that right?

17 A. Yeah.

18 64 Q. And I wonder could TrialView put tab 63 of the Core
19 Book on to the screen.
20

21 LEGAL ADVICE BY MR. MCGUINNESS:
22

23 MR. MCGUINNESS: Chair, I wonder would it be possible
24 to clarify the basis upon which Mr. McDowell is
25 intending to proffer this evidence and ask the witness 11:43
26 to give evidence about it?
27

28 Obviously the Committee is conscious of the particulars
29 set out in the Notice of Inquiry, and it might be

1 helpful at this stage for Mr. McDowell to layout the
2 parameters of the evidence he is intending to adduce,
3 and how he says they are consistent with the fair
4 hearing of the matter at hand.

11:44

5
6 SUBMISSION BY MR. McDOWELL:

7
8 MR. McDOWELL: So I think that's a fair point, in the
9 sense that there is no allegation made in the Notice of
10 Inquiry regarding Dr. Chughtai's complaint to the
11 Medical Council against Witness A.

11:44

12
13 But on the other hand I would say two things: The
14 first is that witness A, after a period of some delay,
15 and through no fault of her own, is here to tell her
16 story about what happened to her. And I mean it is a
17 matter for her rather than for me, but I think that
18 this is an important milestone in the flow of events.

11:44

19
20 And the second thing to say, is that, the Committee I
21 think needs to -- I mean this is a case fundamentally
22 about unwanted contact by Dr. Chughtai to Witness A.
23 And I think that the Committee is entitled to
24 understand what was happening at all stages and the
25 extent of the contact or non-contact that existed
26 between witness A and Dr. Chughtai. So those are
27 comments I make at a general level.

11:45

11:45

28
29 But the other thing to say, is that, in the course of

1 this complaint Dr. Chughtai makes reference to Shane
2 Russell. And I don't want to say too much about
3 evidence that hasn't yet been given, but the reference
4 to Shane Russell in the context of a complaint made
5 about Witness A, I say is potentially a very
6 significant part of the complaint, because it connects
7 Dr. Chughtai's contact with Shane Russell to Witness A.

11:45

8
9 So for all of those reasons, I think this is evidence
10 that the Committee should hear. But all of that being
11 said, if at the end the Committee could take the view
12 that most of what Dr. Chughtai said about the complaint
13 isn't directly relevant to the allegations made, and I
14 wouldn't disagree with that.

11:46

15
16 But I think it is important context and on the issue of
17 Shane Russell I think it is particularly important.

18 CHAIRPERSON: Thank you for that, Mr. McDowell. We
19 will allow you to proceed, but under the understanding,
20 as Mr. McGuinness has very helpfully reminded us, we
21 will treat this evidence with some scepticism, or with
22 caution perhaps maybe more than scepticism so that we
23 understand the context in which it has been adduced.
24 So you may continue.

11:46

25
26 WITNESS A CONTINUED TO BE DIRECTLY EXAMINED BY MR.
27 McDOWELL AS FOLLOWS:

11:46

28
29 65 Q. MR. McDOWELL: Thank you, Chair. Now, I appreciate the

1 copies of this are quite grainy, but I am going to read
2 out some of these documents for the record. So what's
3 on the page is an e-mail sent to complaints at Medical
4 Council by Dr. Chughtai on 19th August 2019. So this
5 is approximately two months after witness A's 11:47
6 complaint. And the subject line, so I am sort of, I am
7 about a third of the way down the page or halfway down
8 the page:

9
10 "Subject: Complaint against Witness A...", with the 11:47
11 Medical Council number.

12
13 "For your attention, attach complaint form against
14 Witness A regarding incidents happen from January 2016
15 to till now. For your convenience, I am writing here
16 as well. My detail Hassaan Affa Beg Chughtai.
17 Complain against Witness A.

18
19 1. Unfair discrimination on the basis of lifestyle
20 cultural and socioeconomic status.

21
22 2. Unfamiliar with professional and personnel conduct.

23
24 3. Fail to demonstrate respect towards colleague of
25 different race, colour and religion.

26
27 4. Hatred towards other colleague.

28
29 5. Fail to demonstrate she can communicate by

1 different means.

2
3 6. Fail to demonstrate she can listen and view into
4 account views of other colleague.

5
6 7. Fail to maintain balance between personnel and
7 professional life.

8
9 8. Distorted and manipulative statements given In bad
10 faith.

11
12 9. Emotional abuse, Inappropriate sexual advances.
13 Submitted complain against me and still refusing to
14 accept her mistake and wrongdoing and on other hand
15 blaming me.

16
17 10. Flirting even after being warned by HR and even
18 through complain letters.

19
20 11. Creating hostile environment and activities
21 against others colleague.

22
23 12. Denying right to life and have family and free
24 movement of other colleague. Affecting social,
25 economical and culture freedom of other Irish resident
26 As these are serious conviction I have submitted
27 complain to guards on 21/05/2019 (copy can be obtain
28 from them). Because she has taken, not to contact
29 police orders, I would like medical council to first

1 take written permission from guards to send her this
2 complain letter. I believe these are serious
3 conviction and she should be suspend until criminal
4 inquiry is completed, submitted to guards. Few of
5 examples given below supports above. During change
6 over in January 2016 when Witness A was late couple of
7 days and leading to delay in patient care and patient
8 suffering, I complain to Dr. Lee. After that, I had to
9 suffer verbal abuse, name calling (fuck) aggression,
10 dominant behaviour and refusal to co operate with me.
11 Later, Dr. Lee tried to diffuse tension. However, I
12 clearly mention that she can work most of time with
13 Oisin other colleague witness statement. But I don't
14 know, why she constantly tried to get closer to me.
15 She would be standing with Dr Lee but texting me about
16 patient. Although sitting with SHO but asking me about
17 patients via SMS, sending flirting SMS. Sitting with
18 me unnecessary after clinic asking what would you do
19 after clinic what u do at home. When I didn't respond
20 in same way she became very aggressive with me showing
21 hatred anger and in order to calm her down I had to
22 give her company which she enjoys. On Friday, I always
23 said her she can go by time but she always call me at 7
24 for some useless reason (witness by friend). However
25 when I need her for urology patient she left without
26 informing me without handing over patient to me leaving
27 patient unsafe. When Dr. Lee was on leave she and
28 other colleague created quiet hostile environment for
29 me. They don't do any ward work, don't go to clinic.

1 When I go to canteen she turn around her face showing
2 extreme dislike. Every time she pass by me she turn
3 her face opposite side just to show me she dislikes me.
4 In order to avoid her hatred and intimidating faces, I
5 started being nice to her and giving her more
6 attention. It was stress full situation for me, team
7 was not co operating and facing hatred however when I
8 became nicer to her she start showing sexual advances
9 touching her face to mine face during round touching
10 her breast to me occasionally. Bending in front of me
11 so her top flip up showing skin and she purposely does
12 this in front of me to make me uncomfortable.

13
14 "Last day when I called her for coffee she came half
15 way and then went to call Kamal, which I thought, she
16 doesn't want to go with me alone and I was okay with it
17 but then I getting sentimental SMS and I didn't replied
18 or replied with annoyance. Next day she waited for me
19 after call and talked to me unnecessary about patient
20 Just to normalize thing (usually she doesn't stay post
21 all) It was quite frustrating to me as she was giving
22 cold and hot treatment and I decided I will clearly
23 find out what she want. Then only I text, you are
24 messing with my mind and I want you out of system. I
25 never said I miss you. I also text her what she want,
26 best way to go forward, if she likes, is to get
27 married. I also offer her courtship as I know she is
28 not Muslim. She said she only consider me as
29 colleague. However while I was on leave she falsely

1 spread bad propaganda about me showing my messages to
2 nurses and her friends (On one occasion when there was
3 blast in UK at children musical festival she passed
4 very derogatory comment about Muslims saying all these
5 done by Muslims and we should follow Israel policy
6 against Muslim). When I came back I had meeting with
7 HR and or Lee there was no confirmation of any messages
8 mainly discussion about future relationship was
9 discussed. I was told to say her sorry and keep at
10 distance. I e-mail Ms. Kelly as I wanted to have
11 meeting with her as I want to show my concern but it
12 never happened. After that she became at first very
13 violent, throwing things, always ignoring me, showing
14 intimidating faces walking too fast to show aggression.
15 Her behaviour with other Muslim registrar was also not
16 appropriate. Dr. Lee advice me to calm her down
17 through nurses so I use to talk in front of her with
18 nurses which changes her mood then she again showing
19 flirt, staring me secretly, talking indirectly to me
20 like she was talking to other but practically talking
21 to me. Few examples, I am going to this festival today
22 with my friends. We are going for dinner there and
23 then will go to club. There is couple with interracial
24 marriage and girl didn't change surname I will do same.
25 First time I talked to her when we going to team dinner
26 and in front of other reg I asked are 'u still crossed
27 with me' she smiled and didn't say anything and then
28 she told other reg to go and do patient stuff. He
29 said, he will do later. She shouted at him and said,

1 go now as he will need medication, practically she
2 wanted to talk to me alone. This is witness incident.
3 After he left she told me she is going to some festival
4 and will stay there over weekend. She also tried to do
5 call with me during last week when she changed her call
6 with other intern and asked me to change my call with
7 other registrar both Dr. Lee and Respiratory consultant
8 also requested me to do so but I refused as I didn't
9 want any further drama. She constantly follow me last
10 day whole hospital witness, when I go to one ward she
11 will be there. I go to stroke unit she will be there.
12 I went down for coffee she came and stand behind me
13 staring in my eyes witness by other colleague and sit
14 with our team. I was very scarred, the way she was
15 following me and I left earlier.

16
17 "I contacted her In 2017 as I had applied in Sligo and
18 Galway and I clearly mentioned that I want to resolve
19 issues and if she can come or else can discuss over
20 message. Same is case in 2019 when I wanted to work in
21 Saolta group again. She has submitted complain against
22 me in bad faith and she will have to apologise for her
23 wrong doing and I am happy to work/co operate to solve
24 Issues with her as colleague and member of same medical
25 council but until she - doesn't accept her wrongdoing
26 and apologies I will not step back and will take every
27 action to get justice.

28
29 "Thanks Hassaan."

1
2 So witness A, I appreciate there is an enormous amount
3 said about you in that complaint, and I don't think you
4 could be fairly expected to take on each and every
5 allegation at this point, but I wonder do you want to 11:53
6 say anything about that complaint?

7 A. I struggle to find any part of that that's true at all.
8 There is a lot that's said that's just -- it is
9 ramblings, it's -- I don't even have any context of
10 where they could have come from essentially. I suppose 11:54
11 there is a couple of things, he mentions Israel policy,
12 certainly when I first got this correspondence I had
13 absolutely no idea what he meant by that. And I still
14 don't know what that policy is, even though it is
15 probably more topical now. You know, saying that I was 11:54
16 dominant and I was violent, like, I was a junior female
17 intern, and he is saying that I was violent towards
18 older male registrars who were more senior than me. It
19 absolutely didn't happen, but it is also, you know,
20 something that's just, I don't know how he can conceive 11:54
21 that, like.

22
23 You know, he makes references to me touching him. I
24 absolutely never touched him. I never made any sort of
25 suggestion that I had any romantic or sexual or any 11:55
26 kind of ideas at all about any of that.

27
28 It is very distressing, the whole thing. You know, I
29 think he has essentially listed as many possible things

1 that he could about me, and there is just no basis that
2 any of it is true.

3 66 Q. Yes. So what follows on in those documents, witness A,
4 is correspondence back and forth between Dr. Chughtai
5 and the Medical Council, but I don't think I need to go 11:55
6 into all of that. But I wonder if TrialView could go
7 to page 421 please.

8 A. Just to say as well, I was receiving these via post,
9 and I found it incredibly distressing. I was afraid
10 that this might be believed, you know, that my -- you 11:56
11 know that my professional career was at risk. And I
12 was under a huge amount of stress when this
13 correspondence was coming through.

14 67 Q. Yes. I wonder if TrialView could go back to that
15 document and go to page 421 within it. 11:56
16 CHAIRPERSON: So if it helps TrialView, I think it is
17 page 10 of the 17 pages of that attachment.

18 68 Q. MR. McDOWELL: Thank you. So witness A, these are --
19 what is on this page and the next page are three
20 e-mails sent by Dr. Chughtai in relation to his 11:57
21 complaint against you. And these e-mails are sent to
22 the Medical Council on 13th and 14th September 2019. I
23 am not going to open all of it, but I just want to
24 focus on the one at the bottom of that page. So I will
25 just read out what it says. It says: 11:57
26
27 "Dear Ms. Grehan
28
29 "I have all messages send by Witness A. However I stop

1 using that mobile. The mobile is in UK and I will
2 definitely send you all messages send by her before PPC
3 meeting."

4
5 And then on the next page:

6
7 "I want to add that she use to put on intimidating
8 Instagram post once I have issue with one another girl
9 thru her friend Instagram ID (Shane Russell) (In one
10 post she purposely posing with open hair to intimidate
11 me) like this there were few post in which she was
12 making fun of my health. She use to call me with
13 blocked number and I have recording of those call
14 unfortunately phone is in UK and I will bring that
15 phone and submit those calls recording. Sometimes she
16 makes new ID I could recognize with post that she is
17 Witness A. Thanks."

18
19 So witness A, we are going to come on to talking about
20 Shane Russell in due course, but is there anything you
21 want to say about the fact that his name is contained
22 there.

11:58

23 A. So essentially at that time I was in Cork and I
24 received this via post and I opened it and I was, like,
25 utterly shocked that I could see his name there because
26 he is a friend from college who I was living with in
27 Cork at the time. There was absolutely no connection
28 in my mind between the two people. And also there was
29 no connection in my mind with Instagram, because I had

11:58

1 a very private not much used account where I had a
2 nickname "Witness A" and it was very much closed off to
3 the, you know, as a private account, and I didn't post
4 much on it.

5 So I found it very unusual that he was referencing 11:59
6 Instagram. I was kind of at that point sure that he
7 couldn't possibly be on the right Instagram. But then
8 he mentioned Shane Russell and, I suppose, I straight
9 away went to explain and asked him why would his name
10 be there, and he was very much, you know, confused as 11:59
11 well.

12 69 Q. Yes. So appreciating that this might require you to go
13 back in the narrative slightly, could you tell the
14 Committee who Shane Russell is and your relationship
15 with him? 11:59

16 A. So we were in college doing medicine together, he is a
17 friend. We lived together in Cork from July 2019 until
18 July 2020 together. There was other, two other people
19 in the house as well. And essentially I just straight
20 away went to him and asked him, you know, what's going 12:00
21 on here, and he kind of panicked, he didn't know what
22 was going on. And he looked through his phone and he
23 found text messages on 8th June 2019. So this was
24 something we weren't aware of, it is something that
25 hadn't come up on his radar at all, and we realised 12:00
26 that it was from Hassaan as well.

27 70 Q. So we might ask TrialView to bring up the Shane Russell
28 text messages, which I think are a separate PDF to the
29 Core Book.

1 CHAIRPERSON: If my numbering is correct, I am calling
2 this Exhibit 16 if anyone else is keeping record.
3 MR. McDOWELL: I am glad you are keeping track,
4 chairperson, because I have certainly lost track at
5 this stage. 12:01
6 CHAIRPERSON: No worries, thank you.
7 MR. MURRAY: Those have just been uploaded there now,
8 chair, so they should be available for the moderator.
9 MR. McDOWELL: So I don't know if TrialView allows you
10 to... perfect. So Mr. Russell is going to give 12:01
11 evidence today hopefully. And he is going to give
12 evidence that on 8th June 2019 he had the following
13 WhatsApp exchange with the 089 phone number of
14 Dr. Chughtai that the Committee has already heard
15 about. And just to remind the Committee that's the 12:01
16 number that as recently as this morning appeared on the
17 document received from St. George's Hospital.
18
19 So just for the sake of the transcript, this is an
20 exchange of messages between that phone number and 12:02
21 Mr. Russell, beginning at 9:45pm on 8th June. It says:
22
23 "Hi Shane, bring the key. Sorry I text the wrong
24 Shane."
25 12:02
26 And Mr. Russell replies saying:
27
28 "Who is this?"
29

1 Response:
2 "I am Hassaan sorry, I have your number from the past,
3 sorry for disturbance."
4
5 Mr. Russell replies saying: 12:02
6
7 "From when?"
8
9 And the number replies:
10 12:02
11 "I don't know, if I see your face maybe it remind me.
12 TC bye. Are you doctor?"
13
14 And Mr. Russell replies saying:
15 12:02
16 "Yup."
17
18 At the bottom of the page. And then over the page:
19
20 "That may be, me too, where you work." 12:02
21
22 And Mr. Russell replies saying:
23
24 "ED."
25 12:02
26 And he says:
27
28 "You works in ED, I works in meds. Maybe I recently
29 work in Tallaght. Do you work in Tallaght or Naas?"

1
2 And then on the next day on 9th June, he says:

3
4 "I just check you on Instagram, I think I know you from
5 Castlebar. Where do you work nowadays? I remember you 12:03
6 were preparing for exam that time."
7

8 So Mr. Russell is going to say that he received those
9 messages on 8th and 9th June 2019. Can I ask you,
10 Witness A, did Mr. Russell ever work in Castlebar? 12:03

11 A. He worked there the year before me as an intern, but
12 when I asked him he didn't really have any recollection
13 of Dr. Chughtai.

14 71 Q. Yes. And in terms of yourself and Mr. Russell living
15 together, can you put these -- can you sort of tell us 12:03
16 where things were at when these text messages were
17 sent?

18 A. So I was in e-mail correspondence with Shane Russell
19 from approximately May 2019 in regards to finding a
20 house in Cork. And on 6th June my mother picked the 12:03
21 keys up from the house in Cork. And on 7th June I went
22 to Cork, well actually it was 6th June, the night, I
23 went to Cork, stayed in the house. And I was probably
24 in correspondence with Shane regarding the fact that I
25 had now gotten the keys. And on 7th June I flew out of 12:04
26 the country to the USA. So because I was going to the
27 USA I couldn't give the keys to Shane and he would have
28 to wait until after I came back.
29

1 So when he says "bring the key", I obviously don't
2 know, I don't know how he decided to reach out to Shane
3 that day, or why, or how he knew that we were
4 connected, because from what I understand when I asked
5 Shane at the time, there was no Instagram post about me 12:04
6 on Shane's profile. We may have had, you know, friends
7 in common, but you would have to go looking through a
8 couple of hundred people to see that we were friends on
9 Instagram together. So it wasn't immediately obvious,
10 you would have to really go rooting for it. 12:05

11 72 Q. Yes. And was it when you received the hard copy
12 correspondence from the Medical Council in September
13 2019, that Mr. Russell connected these messages with
14 your difficulties with Dr. Chughtai?

15 A. Yeah, so Shane obviously -- I went to him straight away 12:05
16 when I read that. We were in the kitchen, and he
17 certainly was quite alarmed, and the two of us couldn't
18 understand, we were checking our Instagram. And then I
19 think, I don't know how he found it on WhatsApp, but he
20 scrolled back and then realised that there was this 12:05
21 exchange. And he told me at the time that he didn't
22 really recall it, it was kind of like someone messaging
23 him and he just responded absent mindedly and didn't
24 think any more of it.

25
26 But he certainly hadn't connected this with the
27 correspondence that I had been getting prior to the
28 correspondence that mentioned him.

29 73 Q. Yes.

1 A. So if that correspondence hadn't mentioned Shane, I
2 would have had no idea about these text messages.

3 74 Q. Yes. And how long did yourself and Mr. Russell live
4 together?

5 A. 12 months. 12:06

6 75 Q. Commencing in June 2019?

7 A. Yeah.

8 76 Q. Yes. And then if I could ask TrialView just to go down
9 one page, and I don't know if that page can be
10 reorientated, but Mr. Russell is going to give evidence 12:06
11 that he received this text message from the same phone
12 number on 22nd January 2020. So do I take it that you
13 and Mr. Russell were living together at that time?

14 A. Yeah, we were, yeah.

15 77 Q. This is a message that says: 12:06
16
17 "Hi Shane, how are you? Everything all right. I am in
18 Ireland. Any room Vacant."
19

20 Is there anything you would like to say about that? 12:06

21 A. So Shane and I were in a lease together in Cork, you
22 know, and it was from July 2019 to July 2020. So when
23 Shane received this, he straight away understood who it
24 was because of the previous messages. He actually was
25 reluctant to tell me because he could see how much 12:07
26 stress I was under from the whole process and how
27 terrified I was that he might turn up in Cork.
28
29 I was at that point having nightmares, I was attending

1 counselling, you know, I was having a lot of trouble
2 with it. So I think he actually didn't tell me
3 straight away that this had happened. But it was kind
4 of obvious that, you know, he was trying to ask Shane
5 if he could live with Shane, which would therefore mean 12:07
6 live with me.

7 78 Q. Yes. And was there any way that you are aware of, or
8 any basis that you are aware of for Dr. Chughtai to
9 understand that you and Mr. Russell lived together?

10 A. I personally don't know, I don't even know how he knew 12:08
11 we were connected, because, as I said, it would have
12 been quite a process to go through Instagram to figure
13 that out. But I did at this point know that he knew of
14 Shane Russell's existence, and that he knew that I knew
15 him, because he mentioned him in the Medical Council 12:08
16 correspondence. But I don't know for certain how he
17 knew we were connected, or whether he knew that we were
18 living together. But it is chilling that he was asking
19 him for a room after saying that he was intimidated by
20 Shane for posing with open hair in previous 12:08
21 correspondence. It was terrifying to be honest.

22 79 Q. Yes. Just to pause there for a moment. So
23 chairperson, I think that I probably have 40 minutes
24 more with witness A, but we have lined up the three
25 witnesses I referred to earlier for half 12, one and 12:08
26 half one. So I mean I am happy to keep going. I am
27 happy to do whatever the Committee wants me to do.

28
29 But as it happens, this is a natural breaking point in

1 witness A's evidence. And I am wondering would it make
2 sense to break for 15 minutes and then go through those
3 three witnesses from half 12 to 2, and then resume with
4 witness A?

5 CHAIRPERSON: Yeah, we are happy to accommodate you, 12:09
6 Mr. McDowell. That makes the best use of the other
7 witness's time, and I hope it is not inconveniencing
8 witness A too much, but maybe it is helpful to have a
9 break at this point. So we can adjourn for the moment
10 and we will resume then at 12:30, is that what you are 12:09
11 suggesting?

12 MR. McDOWELL: Let me double-check that. That is what
13 I am suggesting, we will resume with Dr. Lee at 12:30.

14 CHAIRPERSON: I am not putting you under pressure by
15 saying 12:30? 12:09

16 MR. McDOWELL: No, I am happy with that.

17 CHAIRPERSON: We will do that then. Thank you very
18 much all. Committee colleagues can into private
19 session. Thank you.

20
21 THE HEARING ADJOURNED BRIEFLY AND RESUMED AS FOLLOWS: 12:10
22

23 CHAIRPERSON: So, Mr. McDowell, we are in your hands.

24 MR. McDOWELL: Yes, thank you, chair. I would like to
25 call Tom Lee to give evidence please. 12:31

26 MR. MURRAY: Good afternoon, Dr. Lee, I go might just
27 confirm that you can see and hear me okay. Just before
28 I hand you over to the Committee, would you like to
29 take the oath or you can affirm and attest.

1
2 (Dr. Tom Lee affirmed)

3
4 CHAIRPERSON: So once again, thank you very much for
5 your attendance and I will hand you over to
6 Mr. McDowell who will take you through your evidence.
7 Thank you.

1 DR. TOM LEE, HAVING AFFIRMED, WAS DIRECTLY EXAMINED BY
2 MR. McDOWELL AS FOLLOWS:
3

4 80 Q. MR. McDOWELL: Good afternoon, Dr. Lee. I think you
5 are a consultant geriatrician in Mayo University
6 Hospital, is that right? 12:33

7 A. Correct, yeah, for 14 years.

8 81 Q. Yes. And the Committee has heard a good deal of
9 evidence from the person that we are referring to as
10 Witness A in this case. And part of her evidence was 12:33
11 that she worked under your leadership, if I can put it
12 that way, between January and July of 2016 in Mayo
13 University Hospital, is that correct?

14 A. That's correct. She would have worked with myself, I
15 think from January, from my notes from January to the 12:34
16 end of March of 2016 and then moved to my colleague
17 Prof. O'Malley from April to June to the best of my
18 knowledge but was still in the same hospital.

19 82 Q. Yes, and did Dr. Hassaan Chughtai work with you and
20 Witness A at that time? 12:34

21 A. Correct, he did, and he left our hospital to pursue
22 another employment in I think the end of June, early
23 July 2016.

24 83 Q. Yes, and do you recall any incident or difficulty
25 between witness A and Dr. Chughtai? 12:34

26 A. So this is eight years ago, so I am obviously very
27 heavily reliant on the notes. So it's very difficult
28 to recall a period of time that long ago. I have no
29 recollection of any, any obvious difficulties when I

1 would have seen them together, like, on ward rounds
2 but, you know, this is eight years ago. So I can't --
3 I guess all I can say is I can't recall any direct
4 issues between the two parties in front of me.

5 84 Q. Yes. 12:35

6 A. That's eight years ago, so it is very difficult.

7 85 Q. Yes, and do you have any memory of witness A making any
8 complaint or raising any issue about Dr. Chughtai?

9 A. So again I am reliant on the notes because eight years
10 is a long time but I've made, I made a submission 12:35
11 obviously five years ago which at the time was only
12 three years later, so my memory may have been fresher
13 then. So a very hazy memory of some issue being
14 related to me about inappropriate contacts by phone is
15 to the best of my knowledge what was presented to me 12:35
16 and I would always have been a very strong advocate of
17 the Medical Manpower department and our manager who was
18 a very thorough professional. So I have indicated that
19 I pointed the female NCHD in the direction of Medical
20 Manpower and probably would have informed the Medical 12:36
21 Manpower Manager myself at the time.

22 86 Q. Yes, and that person you are referring to is Annette
23 Kelly?

24 A. Correct, yes.

25 87 Q. And I think just for the Committee's information, 12:36
26 because they don't have the document you are talking
27 about, Dr. Lee, I think that after the complaint was
28 made, you wrote a letter to the Medical Council setting
29 out your recollection of events, isn't that right?

1 A. So there was a three-year time lag to the best of my
2 knowledge. So at the time the issue was brought to the
3 attention of our Medical Manpower Manager and we had a
4 meeting with the male NCHD, Dr. Chughtai Beg, and we
5 outlined that the contacts being made should stop and 12:37
6 to the very best of my knowledge witness A didn't want
7 to take it further but just wanted the contacts to
8 stop. So I think some three years passed before the
9 issue was raised again when witness A had made contact
10 with Annette Kelly who made contact with myself and 12:37
11 that was in May 2019 when we had a phone call, myself
12 and Annette and witness A, where I think she wanted to
13 log an official complaint about what had happened in
14 retrospect three years earlier. That's to the very
15 best of my knowledge. 12:37
16 CHAIRPERSON: If I could just interrupt at this point,
17 Dr. Lee, and it is my fault entirely, I should have
18 pointed out that we are referring to the complainant as
19 witness A, and I would appreciate I know it is
20 difficult as you are giving evidence, we all slip but 12:38
21 if we could just refer to the complainant as witness A,
22 that would be much appreciated.
23 DR. LEE: Yes, absolutely.
24 CHAIRPERSON: And just as a reminder to any parties,
25 listening, we have anonymised this witness and we 12:38
26 require participants not reveal that identity.
27 DR. LEE: Apologies, my profuse apologies.
28 CHAIRPERSON: No need for you to apologise, it was my
29 oversight. So I am sorry for interrupting you.

1 DR. LEE: That won't happen again I assure you.

2 CHAIRPERSON: It is entirely possible because it is
3 very easy for us to slip into it. A number of us have
4 done it. So I am sorry to have interrupted.

5 88 Q. MR. McDOWELL: So I am going to ask if TrialView could 12:38
6 upload, sorry, not upload but put on the screen tab 51
7 of the Core Book which is Dr. Chughtai's HR file from
8 Mayo University Hospital which we looked at yesterday
9 and if I could ask that we go to the second page
10 please. So, Dr. Lee, this is a memo that Annette Kelly 12:39
11 prepared in relation to the meeting that I think you
12 discussed and she is going to give evidence about it.
13 I am just going to read it to you and you can just tell
14 me what your reaction is to it. So it says:

15
16 "Purpose of meeting was because of texts Dr. Hassaan
17 had been sending to his Medical Intern (Witness A)
18 which she felt were in appropriate in nature. He had
19 been saying he was lonely and wanted some company and
20 wanted to be her friend. She brought it to Dr. Lee's
21 attention and subsequently mine but Dr. Hassaan was on
22 leave and he was only back to work today.

23
24 "Dr. Lee and myself highlighted how inappropriate it
25 was for him to be texting anyone about this when it
26 wasn't reciprocated.

27
28 "We advised him that the Intern in question did not
29 wish to pursue this any further in a formal manner but

1 had highlighted it for our attention.

2
3 "He confirmed he would not send any further texts and
4 was apologetic for this occurring in the first instance
5 and said he would like to apologise to her. I advised
6 him that I would check with Witness A if she wanted to
7 meet with him regarding this apology and let him know.
8 (I subsequently rang Witness A on Friday 15th April and
9 she said she would think about this over the weekend
10 and let me know on Monday).

11
12 "We asked him was everything ok with him and would he
13 benefit from speaking with Employee Support which is a
14 confidential counselling service for the HSE. He asked
15 that I give him the contact number for same (e- mailed
16 to him on Friday 15 th April at approx 6.30pm)

17
18 "He discussed his study leave/annual leave request with
19 Dr. Lee and the meeting concluded."

20
21 So does that accord with your recollection?

22 A. Yeah, that is, because I haven't actually seen that
23 document for quite a while and that is to the best of
24 my recollection exactly what happened.

25 89 Q. Yes. And I think earlier in your evidence you
26 mentioned a phone call that took place between
27 yourself, Ms. Kelly and witness A on the in May of
28 2019, can you recall what that was about?

29 A. So, Dr -- sorry, witness A, I will do my best here,

12:40

1 witness A had made us aware in general terms that there
2 were ongoing difficulties. Is the other person called
3 witness B?

4 90 Q. No, that's Dr. Chughtai.

5 A. Dr. Chughtai, sorry. So Dr. -- yeah, it would appear 12:41
6 that witness A had ongoing contacts after the
7 employment from Dr. Chughtai and gave us a general
8 outline. I can't remember how long the phone call was.
9 It wasn't lengthy, lengthy, maybe five minutes, ten
10 minutes, difficult to remember exactly and clearly had 12:41
11 had ongoing contacts that were inappropriate and in
12 that context wanted to escalate the events from 2016 to
13 a formal complaint, a formal complaint of some
14 description.

15 MR. McDOWELL: Yes, that's all very helpful, Dr. Lee, 12:41
16 thank you for that. You might answer any questions
17 that the Committee members have for you?

18 A. Sure.

19 CHAIRPERSON: Thank you very much. Committee
20 colleagues, any questions for the witness? 12:42
21 MS. DEVINS: No, thanks, chair.

22 DR. DAVIN-POWER: No, thanks, chair.

23 CHAIRPERSON: I don't think I have any other questions
24 myself, Dr. Lee, so it just remains for me to thank you
25 very much for your evidence today and to wish you well. 12:42
26 DR. LEE: Thank you very much.

27
28
29

1 LEGAL ADVICE BY MR. McGUINNESS:

2
3 MR. McGUINNESS: Chairman, before Dr. Lee departs, I
4 should just of course ask the Committee to note, as it
5 does know, but for Dr. Lee to note, that Dr. Chughtai 12:42
6 isn't appearing or attending today as the Registrant
7 doctor before the Committee.

8
9 So accordingly, I am advising the Committee that at
10 present it should reach -- it should not discuss your 12:42
11 evidence in the Committee room, nor should it reach any
12 conclusion or decision about your evidence unless and
13 until your evidence becomes finalised, because the
14 Committee is very conscious of the procedural rights of
15 and substantive rights of Dr. Chughtai in relation to 12:43
16 appearance, cross-examination and testing the evidence
17 given by witnesses.

18
19 And as I understand it, the Committee will be
20 corresponding or messaging, through the CEO probably, 12:43
21 with Dr. Chughtai, informing him of the evidence that
22 has been given to date, and inviting him to reappear,
23 and inviting him to consider whether he wishes to
24 exercise his right of appearance and right to
25 cross-examine, and indeed right to give evidence 12:43
26 himself in relation to any matters.

27
28 So the Committee I think is bearing all those
29 considerations in mind, and that's my advice to the

1 Committee at this stage.

2
3 If I might also add one other unrelated issue,
4 chairman.

5 CHAIRPERSON: Please.

12:43

6 MR. McGUINNESS: Obviously the PCC hearing already
7 directed that witness A be identified, as such. And
8 for the abundance of doubt, it is my advice that the
9 Committee should give the appropriate direction to the
10 stenographers that any time that witness A's name
11 appears, it should be changed to witness A instead of
12 her real life name, just for the abundance of caution.

12:44

13 CHAIRPERSON: Those two pieces are very helpful,
14 Mr. McGuinness, I really appreciate that, and I am sure
15 our stenographer will make that note, and we give that
16 direction formally.

12:44

17
18 So just again to say thank you, Dr. Lee. Obviously in
19 the event that Dr. Chughtai exercises his right to
20 attend and call or cross-examine witnesses, there is a
21 possibility that he may seek to have you recalled to
22 cross-examine, but I appreciate your attendance today,
23 and thank you very much for your evidence.

12:44

24 DR. LEE: Thank you very much and good afternoon,
25 everybody.

12:45

26 CHAIRPERSON: And to you.

27
28 THE WITNESS WITHDREW

29

1 MR. McDOWELL: So, chair, we told Dr. Russell, who is
2 the next witness, to join at 1 o'clock to give his
3 evidence, so perhaps we might just rise until
4 1 o'clock.

5 CHAIRPERSON: We will do that. Thank you very much.

12:45

6
7 THE HEARING ADJOURNED BRIEFLY AND RESUMED AS FOLLOWS:

8
9 MR. McDOWELL: Good afternoon, chair, so I propose to
10 call Shane Russell.

13:01

11 CHAIRPERSON: Thank you, please do.

12 MR. MURRAY: Good afternoon, Dr. Russell, can I confirm
13 you can see and hear us okay.

14 MR. RUSSELL: Hi, yeah, I can hear you fine.

15 MR. MURRAY: So before I hand you over to the Committee
16 you need to be sworn in. So you can either swear on a
17 holy book, if you have one to hand, or you can affirm
18 and attest.

13:01

19 MR. RUSSELL: Affirm and attest.

20
21 (Dr. Shane Russell affirmed).

13:01

22
23 CHAIRPERSON: Thank you. Good afternoon, Dr. Russell,
24 you are very welcome. Thank you for making time today.
25 Before I hand you over to Mr. McDowell, I just want to
26 draw your attention to the fact that we have previously
27 decided as a Committee to anonymise the complainant in
28 this case, who we will be referring to as Witness A.
29 I would appreciate in your response if you can try to

13:01

1 remember to refer to them as witness A. We have all
2 inadvertently slipped a couple of times, so we will
3 make sure that the stenographer corrects that for us.

4
5 But just if you can, I would appreciate your assistance 13:02
6 in calling the complainant, witness A.

7
8 The second matter is that Dr. Chughtai is not here with
9 us here today present, for reasons that we don't need
10 to go into, but he is just not here today. And 13:02
11 Mr. McGuinness, after the conclusion of your evidence,
12 will be giving some further update on that matter. But
13 for now thank you for your attendance and I will hand
14 you over to Mr. McDowell.

15 13:02
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29

1 MR. SHANE RUSSELL, HAVING BEEN SWORN, WAS DIRECTLY
2 EXAMINED BY MR. McDOWELL AS FOLLOWS:

3
4 91 Q. MR. McDOWELL: Good afternoon, Dr. Russell. So the
5 Committee has heard quite a bit of evidence from
6 Witness A about various things, including her
7 relationship with you. So I think that you were
8 friends in college, isn't that right?

13:02

9 A. That's correct.

10 92 Q. Yes. And Witness A has given evidence that you lived
11 together in Cork between July 2019 and July of 2020,
12 isn't that right?

13:02

13 A. That's right.

14 93 Q. Yes. And I am going to ask -- sorry before I do this,
15 when you moved in together, or at some stage around
16 then, did Witness A ever say to you that she had had
17 any issues with Dr. Chughtai, were you ever aware of
18 that?

13:03

19 A. No, I don't think so.

20 94 Q. And when did you first become aware that she had an
21 issue?

13:03

22 A. I think it was shortly -- it was probably around the
23 time of moving in, maybe June or July that we were
24 speaking.

25 95 Q. Yes. So I am going to ask that certain text messages
26 relating to you are put on the screen, which the
27 Committee will have seen earlier.

13:03

28
29 So at the risk of asking you the obvious, Dr. Russell,

1 could you just tell the Committee what this document is
2 on the screen?

3 A. It is a screenshot from my phone of whatsapp messages
4 that I received --

5 96 Q. Yes. 13:04

6 A. -- on 8th June.

7 97 Q. Yes, 8th June 2019, is that right?

8 A. Yes.

9 98 Q. And did you know when you received the messages who was
10 sending them to you, or who sent them to you? 13:04

11 A. No, I didn't know the person.

12 99 Q. Yes. And I am not going to read the messages, because
13 I have already read them out to the Committee during
14 witness A's evidence, so I don't need to repeat myself.
15 But could you just in general terms describe what 13:04
16 happened in this exchange of text messages?

17 A. I received text messages from an unknown number. They
18 were multiple, I didn't really understand what the
19 person was getting at or asking, and I wasn't -- I was
20 sure I didn't know the person, so I didn't really 13:05
21 engage, I just asked a few quick questions.

22 100 Q. Yes. And when they said:
23
24 "I am Hassaan, sorry."
25 13:05
26 Did that mean anything to you?

27 A. No, I couldn't place Hassaan to somebody I knew.

28 101 Q. Yes. And if I could just ask TrialView to go to the
29 next page please. So again these have all been read to

1 the Committee, but on June, I think, that person sent
2 you messaging saying:
3
4 "I just check your Instagram, I think I know you from
5 Castlebar. Where do you work nowadays? I remember you 13:05
6 were preparing for exam that time."
7
8 Do you recall meeting Dr. Chughtai, Dr. Hassaan
9 Chughtai in Castlebar at any stage?
10 A. I don't remember that. 13:05
11 102 Q. But you did work in Castlebar?
12 A. I worked in Castlebar in 2015.
13 103 Q. Yes. And was there any reason that you didn't write
14 back to that second tranche of messages?
15 A. I thought they were a bit unusual. I was pretty sure I 13:06
16 didn't know the person, and it wasn't something I
17 wanted to engage in.
18 104 Q. Yes. And did you attribute any significance to these
19 messages at the time that you received them?
20 A. Not really, no. 13:06
21 105 Q. No. And do you have any memory of witness A at a later
22 point discussing a complaint made about her to the
23 Medical Council with you?
24 A. Sorry, could you repeat that question again?
25 106 Q. At a later point from these messages, moving on in 13:06
26 time, do you have any recollection of witness A
27 discussing with you a complaint that had been made
28 about her to the Medical Council?
29 A. Yes, I understand there was a response, what do you

1 call it, a complaint made back about her, and I think
2 my name was mentioned in it. I haven't read the
3 document since, but I remember seeing the document a
4 long time ago.

5 107 Q. Yes. And perhaps for completeness I will bring that up 13:07
6 on to the screen. So it is at tab 63 of the Core Book,
7 and then at page 421 within that. So Dr. Russell, I am
8 not going to trouble you with the context in which
9 these communications appear in terms of Dr. Chughtai's
10 complaint against witness A, but you see at the bottom 13:07
11 of the page there, this is an e-mail that Dr. Chughtai
12 wrote to the Medical Council about his complaint. And
13 he says:

14
15 "Dear Ms. Grehan 13:07

16
17 "I have all messages send by Witness A. However I stop
18 using that mobile. The mobile is in UK and I will
19 definitely send you all messages send by her before PPC
20 meeting."

21
22 And then over the page the e-mail continues:

23
24 "I want to add that she use to put on intimidating
25 Instagram post once I have issue with one another girl
26 thru her friend Instagram ID (Shane Russell) (In one
27 post she purposely posing with open hair to intimidate
28 me) like this there were few post in which she was
29 making fun of my health."

1 And that e-mail was sent on 13th 2019 to the Medical
2 Council. Do you have anything to say about that, or do
3 you know what is being referred to there?

4 A. Yeah, it rings a bell now that -- I haven't seen that
5 since, but I remember seeing it once before, and yeah, 13:08
6 it sounds pretty bizarre.

7 108 Q. But do you know -- taking what Dr. Hassaan says there,
8 do you know what he is talking about in terms of an
9 intimidating Instagram post, a friend's Instagram ID,
10 why your name appears? 13:08

11 A. No, I don't know.

12 109 Q. So you can't offer any explanation as to what is being
13 referred to in that e-mail?

14 A. I don't know what specific Instagram post he is
15 speaking about. 13:09

16 110 Q. Yes. Then if we could go back to the Shane Russell
17 text messages file for a moment. And if we could go to
18 the third page please. I know you can see it now. So
19 can you tell the Committee what that document is?

20 A. The screenshot from my phone of a text message I 13:09
21 received from the number that's displayed.

22 111 Q. Yes. And it says:
23

24 "Hi Shane, how are you? Everything all right? I am in
25 Ireland. Any room vacant?" 13:09
26

27 And it is dated 22nd January 2020, isn't that right?

28 A. That's correct.

29 112 Q. Yes. And on 22nd January 2020, were you living with

1 Witness A?

2 A. Yes.

3 113 Q. And the number that sends you that message is the same
4 number as the WhatsApp messages, isn't that right?

5 A. That's correct. 13:10

6 114 Q. Yes. And when you received that message, what was your
7 reaction to it, or what did you do?

8 A. Again I thought it was strange that this person I
9 didn't know was contacting me. I think I brought it up
10 in conversation around the household. There was maybe 13:10
11 four or five of us living in the house at the time, and
12 Witness A and I realised that this could be the same
13 person.

14 115 Q. Yes. And can you think of any reason as to why
15 Dr. Chughtai would send you this message? 13:10

16 A. I don't know.

17 MR. McDOWELL: Okay, thank you very much, Dr. Russell.
18 You might answer any questions the Committee members
19 have for you?

20 CHAIRPERSON: Thank you, Mr. McDowell. Committee 13:10
21 colleagues, any questions for the witness?

22 MS. DEVINS: No, thank you, chair.

23 DR. DAVIN-POWER: No, thank you, chair.

24 CHAIRPERSON: Thank you. And likewise I don't have any
25 questions. So before I let you go, I will just ask 13:11
26 Mr. McGuinness, who can do this so much more eloquently
27 than I, to explain the advice that he wishes to give to
28 you.

29

1 LEGAL ADVICE BY MR. McGUINNESS:

2
3 MR. McGUINNESS: Chairman, thank you. I want to give
4 the following advice to the Committee in the presence
5 of Dr. Russell. 13:11

6
7 At this point in time, Committee, Dr. Chughtai is not
8 present or represented, and the Committee is acutely
9 conscious of the requirement to afford fair procedures
10 to him and natural justice, and give him an opportunity 13:11
11 to exercise his statutory rights to appear and
12 cross-examine you should he so choose to do at a later
13 date.

14
15 And accordingly he will be notified of your evidence 13:11
16 that has been given, provided with a copy of it, and he
17 will be invited by the Committee to discover whether he
18 wants to make arrangements to appear and wishes to ask
19 you any questions in relation to your evidence.

20 13:12
21 And accordingly, I am advising the Committee that your
22 evidence may not be complete, there may be further
23 evidence. And in these circumstances my advice to the
24 Committee is that they should not discuss your evidence
25 at all, or come to any conclusion or decision in 13:12
26 relation to your evidence.

27
28 And I hasten to add, it is nothing to do with your
29 evidence, as such, as given, but is a fundamental

1 procedural requirement that they only determine matters
2 depending upon having heard the totality of evidence
3 available.

4
5 And if Dr. Chughtai wants to challenge it or ask any 13:12
6 questions, you may be recalled in order to give him
7 that opportunity. Thank you.

8 CHAIRPERSON: Once again thank you, Mr. McGuinness, for
9 that, that's very helpful.

10 13:12
11 It just remains for me to thank you again, Dr. Russell,
12 for your attendance today. As Mr. McGuinness has
13 explained, there is a possibility that we may need to
14 recall you if Dr. Chughtai wishes to cross-examine you
15 on your evidence that you have given today. 13:13

16
17 But I hope we haven't inconvenienced you and your
18 clinical service too much, but we thank you for your
19 attendance today and wish you well.

20 MR. RUSSELL: Thank you. 13:13

21
22 THE WITNESS WITHDREW

23
24 MR. McDOWELL: So chair, Ms. O'Sullivan is arranging
25 for Dr. Cullen to be called now to see if she can come 13:13
26 earlier than 1:30. So I wonder could we maybe come
27 back at 20 past one?

28 CHAIRPERSON: We can of course. We can of course.

29 MR. McDOWELL: Thank you.

1 CHAIRPERSON: Thank you very much.

2
3 THE HEARING ADJOURNED BRIEFLY AND RESUMED AS FOLLOWS:

4
5 CHAIRPERSON: So we are happy to proceed with the next 13:22
6 witness.

7 MR. McDOWELL: Thank you, chair, I am going to call
8 Claire Cullen please.

9 MR. MURRAY: Good afternoon, Dr. Cullen, I might just
10 confirm you can see and hear us? You might need to 13:23
11 turn on your camera and unmute your mic.

12 DR. CULLEN: Yes, thank you I can see and hear.

13 MR. MURRAY: Just before I hand you over to the
14 Committee, you need to be sworn in, so you can swear on
15 a holy book, if you have one to hand, or you can affirm 13:23
16 and attest.

17 DR. CULLEN: I will affirm and attest.

18
19 (Dr. Claire Cullen affirmed).

20 13:23
21 CHAIRPERSON: Dr. Cullen, thank you very much, you are
22 very welcome to this inquiry. We appreciate you giving
23 your time to it.

24
25 There is a couple of matters I would just like to say 13:23
26 before I hand you over to Mr. McDowell, who is the
27 counsel for the CEO.

28
29 The first is that we have decided to anonymise the

1 complainant in this case, so even though they are a
2 friend and colleague of yours, if you could refer to
3 them as witness A rather than by their name, I would
4 appreciate that.

5
6 we have all made the mistake of inadvertently naming,
7 so our stenographer will correct any slips. And the
8 parties to this inquiry are instructed not to disclose
9 the complainant's name.

10
11 The second point is that Dr. Chughtai is not present
12 here today, for reasons we don't need to go into, but
13 he is not present today.

14
15 And at the end of your evidence I am going to invite,
16 again, Mr. McGuinness to give us a little bit of
17 explanation, which he has done very helpfully with the
18 other witnesses, but it would be helpful for you to
19 hear that advice as well.

20
21 So once again thank you for your time today. I will
22 hand you over to Mr. McDowell now who will take you
23 through your evidence.

24 DR. CULLEN: Okay, thank you.

1 DR. CLAIRE CULLEN, HAVING BEEN SWORN, WAS DIRECTLY
2 EXAMINED BY MR. McDOWELL AS FOLLOWS:

3
4 MR. McDOWELL: Dr. Cullen, good afternoon, and thank
5 you for attending to give your evidence. You are a 13:25
6 practising doctor, obviously, isn't that right?

7 A. That's correct.

8 116 Q. Yes. And you were, I think, a medical intern in
9 Castlebar Hospital between January and July of 2016,
10 isn't that so? 13:25

11 A. Yes.

12 117 Q. And at that stage you and witness A were friends, is
13 that fair to say?

14 A. Yes, we were house mates.

15 118 Q. Yes. And you were close at that time? 13:25

16 A. Yes.

17 119 Q. Yes. And you are also, I take it, familiar with
18 Dr. Chughtai from working in the hospital?

19 A. Yes, yeah.

20 120 Q. And did you become aware during that time that an issue 13:25
21 had arisen, or there was an ongoing issue between
22 Dr. Chughtai and witness A?

23 A. Yes, yeah.

24 121 Q. And I take it that you were aware of that because of
25 things that witness A said to you? 13:25

26 A. Exactly, yeah, and messages that I would have seen.

27 122 Q. Yes. So did witness A show you messages on her mobile
28 phone?

29 A. Yeah.

1 123 Q. Yes. And I am not going to get into what those said,
2 witness A has given evidence about what they said. But
3 in broad terms, what was the -- what was your
4 recollection of what those messages said?
5 A. They were just inappropriate messages to send to a 13:26
6 junior colleague. They were, you know, insisting on
7 meeting up, talks of, you know, marrying Dr. Chughtai.
8 And, I suppose, as well, not so much the content, but
9 the persistency of it and persistent phone calls and
10 things as well, so it was just the kind of combination 13:26
11 was quite unsettling.
12 124 Q. Yes. And your understanding was that those text
13 messages were coming from Dr. Chughtai, is that right?
14 A. Absolutely, yeah.
15 125 Q. Yes. And do you recall any of this being a sort of, if 13:26
16 I can use this word, a human resources issue within the
17 hospital?
18 A. Well, in terms of that -- witness A did flag it with
19 human resources that she wasn't comfortable to work
20 with Dr. Chughtai, and that there was a meeting with HR 13:27
21 and her consultant at the time, as far as I know, and
22 herself.
23
24 I am unclear exactly of the outcomes other than she was
25 taken off the on-call rota with him. And I remember 13:27
26 that because I was essentially put into those shifts
27 instead, which didn't really seem to be resolving the
28 issue as such but...
29 126 Q. Yes. I am now going to ask that some screenshots of

1 text messages be put on the screen. Those are from tab
2 47 of the Core Book. So just while that's uploading,
3 Dr. Cullen, did you finish working in Mayo Hospital in
4 June or July of 2016?

5 A. Yes. 13:27

6 127 Q. And where did you go then?

7 A. I moved on to Temple Street Children's Hospital.

8 128 Q. Yes. And how long were you in Temple Street for?

9 A. A year.

10 129 Q. Okay, so up until the middle of 2017? 13:28

11 A. Yes.

12 130 Q. And I don't think witness A was in Temple Street during
13 that time, is that right?

14 A. No, she wouldn't have been. We would have kept in
15 touch, you know, through texts or a few meet-ups in 13:28
16 Galway. So from time to time I would have been, you
17 know, up to speed, I couldn't really believe that it
18 was still going on through that year.

19 131 Q. Yes. So if I could ask that we go to page 22 please.
20 So and if we just scroll up slightly so we can see the 13:28
21 top of that please. Thank you.

22

23 So could you tell the Committee what this document is,
24 Dr. Cullen?

25 A. Yeah, so that's a screenshot of a message that I would 13:29
26 have sent to witness A when I received a message from
27 Dr. Chughtai.

28 132 Q. So just to be clear on what you are saying there,
29 Dr. Cullen, you sent the screenshot to witness A, is

1 that right?

2 A. Yes.

3 133 Q. But I take it then that the message, the white message
4 on the left is the message you received rather than
5 sent? 13:29

6 A. Absolutely, yes, sorry. So the message on the left in
7 the white was a text message from Dr. Chughtai, sent to
8 me almost a year after leaving the hospital.

9 134 Q. Yes. And we see at the top of the page that there is a
10 previous -- clearly that's the ending of a previous 13:29
11 conversation?

12 A. Yeah.

13 135 Q. What -- so would that have been an old conversation or
14 a recent conversation, can you recall?

15 A. That would have been an old conversation, so most 13:30
16 likely based from -- as far as I recall, my last shift
17 in Castlebar was while I was on call with Dr. Chughtai
18 as well, so that would have been the end of that
19 on-call shift.

20 136 Q. Yes. And even though that number, the 083 number is 13:30
21 not saved in your phone, you are satisfied that that
22 was Dr. Chughtai texting you?

23 A. Absolutely, yes.

24 137 Q. And then if we could go to the -- the Committee have
25 seen these messages, Dr. Cullen, they are familiar with 13:30
26 them already. And if we go to the next page, we see
27 that halfway down the page, Dr. Chughtai says:
28
29 "Can I call you for a moment?"

1 You say:
2
3 "No."
4
5 Then he says: 13:30
6
7 "Okay, will you please do this? I didn't say anything
8 stupid I just asked her if she would like to come with
9 her friend for dinner but I don't know why she would
10 take everything negative. Tell her I am not contacting 13:30
11 her. Take it easy."
12
13 And then at the bottom you write back saying:
14
15 "Hassaan, I am not involved in this, don't message me 13:30
16 either."
17
18 Is that right?
19 A. Yeah.
20 138 Q. And you sent these screenshots on to Witness A? 13:30
21 A. Yes, yeah.
22 139 Q. Did you do that immediately, or did you allow some time
23 to pass can you recall?
24 A. No, I would say it would have been immediately, because
25 I knew at the time that there were issues, she had gone 13:31
26 to the guards in relation to this, and I knew that
27 there was kind of various phone numbers being used by
28 Dr. Chughtai. So, I suppose, I just wanted to do what
29 I could to support her evidence in, you know, the

1 harassment.

2 140 Q. Yes. And are you able to offer any explanation to the
3 Committee as to why Dr. Chughtai would send you those
4 messages?

5 A. He would have assumed at the time, you know when I was 13:31
6 working in Castlebar, we would have been the two
7 closest medical interns. He knew that I lived with
8 her, so he would have assumed that we were close
9 friends.

10 141 Q. Yes. But that is obviously just speculation, that's 13:31
11 informed speculation on your part, is that fair to say?

12 A. Absolutely, yes.

13 MR. McDOWELL: Those are the only questions I have for
14 you, Dr. Cullen. You might answer any questions that
15 the Committee have for you. 13:32

16 DR. CULLEN: Yes, thank you.

17 CHAIRPERSON: Thank you, Mr. McDowell. Committee
18 colleagues, any questions for the witness?

19 MS. DEVINS: No, thank you, chair.

20 DR. DAVIN-POWER: No, thank you, chair. 13:32

21 CHAIRPERSON: Likewise I have no questions for you,
22 Dr. Cullen. So I am going to invite Mr. McGuinness to
23 again give the Committee the advice in your presence so
24 you can hear the context of his advice. If I could
25 impose upon you again, Mr. McGuinness. 13:32

26

27 LEGAL ADVICE BY MR. MCGUINNESS:

28

29 MR. MCGUINNESS: Thank you, Chairman and Committee. I

1 am advising the Committee that Dr. Cullen may not have
2 finished her evidence, she is finished her evidence in
3 direct. And the Committee is acutely conscious of the
4 rights of Dr. Chughtai to fair procedures, to his right
5 to challenge evidence, to a right to appear and
6 cross-examine any witness, if necessary.

13:32

7
8 Therefore, I am advising the Committee that it should
9 encompass your evidence in the evidence of the
10 proceedings to be sent to Dr. Chughtai, and that he
11 should be invited to appear, should he wish to do so,
12 and to indicate whether he wishes to cross-examine you
13 or any other witness who has given evidence to date.
14 This is his statutory right under the scheme, and
15 accordingly your evidence may not be concluded today.

13:33

13:33

16
17 Consequentially I am also advising the Committee that
18 as they may not have heard your complete evidence, they
19 should refrain from discussing it at all, or coming to
20 any conclusion or decision about it, pending
21 clarification of Dr. Chughtai's intentions about
22 reappearing at the Committee and/or cross-examining any
23 witnesses, if he so indicates. Thank you.

13:33

24 CHAIRPERSON: Thank you, Mr. McGuinness. I hope that
25 has been helpful to you, Dr. Cullen. It does
26 unfortunately mean that there is a possibility that the
27 Committee may need to recall you such, such that
28 Dr. Chughtai has an opportunity to cross-examine you,
29 if he so wishes.

13:33

1 I hope we haven't inconvenienced you too much today
2 with our proceedings, but we thank you for your
3 attendance today and we will let you back to your, no
4 doubt, busy clinic, so take care.

5 DR. CULLEN: Lovely, thank you very much.

13:34

6
7 THE WITNESS WITHDREW

8
9 MR. McDOWELL: So, chair, could we say 2 o'clock to
10 resume? Can you hear me, chair?

13:34

11 CHAIRPERSON: Sorry, thank you, Mr. McDowell, I didn't
12 catch that last piece there.

13 MR. McDOWELL: I was going to say could we say
14 2 o'clock to resume please?

15 CHAIRPERSON: Absolutely, we can of course.

13:34

16 MR. McDOWELL: Thank you.

17 CHAIRPERSON: Thank you very much.

18
19 THE HEARING ADJOURNED FOR LUNCH

1 THE HEARING CONTINUED AFTER LUNCH AS FOLLOWS:

2
3 CHAIRPERSON: Mr. McDowell, I will hand back to
4 yourself.

5 MR. McDOWELL: Thank you, chair. So with the
6 Committee's leave I will recall witness A please.

14:05

7 CHAIRPERSON: Please do.

8 MR. MURRAY: Just to note, chair, witness A is
9 currently in the public gallery, so we might need to
10 pause the hearing for a moment to allow Trialview to
11 change the permissions and refresh the hearing room.

14:06

12 CHAIRPERSON: okay.

1 WITNESS A, HAVING BEEN RECALLED, CONTINUED TO BE
2 DIRECTLY EXAMINED BY MR. McDOWELL AS FOLLOWS:

3
4 142 Q. MR. McDOWELL: Good afternoon, witness A.

5 A. Good afternoon.

14:08

6 143 Q. Thank you for facilitating that break. So, I think,
7 chairman I have about another 30 minutes of questions
8 for witness A.

9
10 So the next document I am going to look at is tab 50 of
11 the Core Book, which might just take a second to upload
12 and put on the screen. So, witness A, when we
13 finished, when your evidence finished at around quarter
14 past 12 this afternoon, we had just discussed the
15 message that Shane Russell received on 22nd January of
16 2020. And I now want to ask you about the document on
17 the screen at the moment. Could you tell the Committee
18 that that document is?

14:09

19 A. I actually can't see a document.

20 144 Q. I am sorry, I don't know why that might be. Committee
21 members, can you see a document on your screen?

14:09

22 CHAIRPERSON: I can see a document on the screen all
23 right, but we might just ask our TrialView colleagues
24 to see if they can just double check the witness's
25 access so that she can see.

14:10

26 MODERATOR: It might help if the witness just refreshes
27 their page.

28 A. Okay. Yes, I can see it now.

29 145 Q. MR. McDOWELL: Great. So can you tell -- witness A,

1 could you tell the Committee what this document is?

2 A. So this is a text message, it is a screenshot from my
3 phone that I received in July -- well, I actually
4 didn't receive it until probably August, but it was
5 sent to me in July 2020.

14:10

6
7 At that point I was living in Dublin and the Covid
8 pandemic had started, so I remember that I had received
9 these messages. Essentially the phone was out of use.
10 I had a new phone number. I think my statement to the
11 Medical Council is actually incorrect, because it was
12 2019 when I got the new phone number in about August,
13 but I still had the old phone, and it was on a
14 different SIM. So I deactivated that SIM kind of later
15 on.

14:11

14:11

16
17 But essentially I only turned that phone on when I
18 started a new job to make sure that the colleagues that
19 I was working with were using the correct number, or
20 for whatever reason if someone was trying to contact me
21 and I hadn't received a message, I just checked to make
22 sure that they hadn't sent it to that phone. So when I
23 received these messages initially --

14:11

24 146 Q. Can I just interrupt to ask you, witness A, why did you
25 change phone number in 2019?

14:11

26 A. Because of all of this essentially, I felt like that
27 was the only thing that I could do to stop it
28 happening.

29 147 Q. Yes. And did doing that cause you inconvenience?

1 A. Yeah, so I obviously had been working in several
2 places, and I had to tell everyone in my personal life
3 and my professional life that I was changing the
4 number. It meant that I paid bills on both the
5 numbers, because I essentially knew that this could 14:12
6 have been evidence at some point, and I was trying to
7 keep it activated for as long as possible, but I did
8 end up cutting that plan and not paying it, and then I
9 lost access to the WhatsApp service, because
10 essentially you need the phone number and the plan to 14:12
11 be active for the WhatsApp to be accessed.

12 148 Q. Yes.

13 A. So I still have that phone, but I can't access it. It
14 would need to be forensically accessed at this point.

15 149 Q. Yes. So the messages you receive in July 2020, and we 14:12
16 see that the date of Thursday, 16th July, is at the top
17 of the screen. And it is from a number that begins
18 +1(203), I take it that number doesn't mean anything to
19 you?

20 A. No, I mean other than that it looks similar to previous 14:13
21 ones, you know, with the +1.

22 150 Q. Yes. And we can see that it says 11 unread messages.
23 So just to take those messages, the first one says:
24
25 "Witness A, please don't block, contact me or allow me 14:13
26 to contact you. Please don't involve Gardaí. I beg
27 you, I will do whatever you say, I am missing you very
28 badly. Please talk to me. I can't do anything. Just
29 give me one chance. I will die without you."

1 The next message says:
2
3 "Don't be so cruel, just talk to me, I am in serious
4 stress, I need your support."
5
6 The next message says:
7
8 "I love you."
9
10 The next message says:
11
12 "I will die without you, don't do that."
13
14 The next message says:
15
16 "Simply reactivate your Instagram profile and I will
17 myself correct everything. You don't have to do
18 anything. I am not asking you for any romance, but at
19 least as a human you can give me this favour. If you
20 do want me to try for you, just don't block me. You
21 have enough proof to get me locked. It is up to you
22 what you want. I try to live without you and I fail.
23 I don't know about you, I can't live without you in
24 Ireland, so if you don't reply I will leave your
25 country. God bless you."
26
27 Then the next message says:
28
29 "I haven't seen for a while, upload your recent pics

14:13
14:13
14:13
14:14

1 and either add me or make it public. Let's go to Spain
2 and get Corona. Please forgive me. Any right is
3 always right. Big please. Where is any...".

4
5 And then we see on Friday, 17th July, a message saying: 14:14

6
7 "You are ruining my life, please do communicate, I want
8 to sort out complaint what you want."

9
10 And then Sunday, 19th July, a full stop. 14:14

11
12 chair, I wonder just before I ask witness A about these
13 messages, I wonder just if the direction regarding
14 anonymisation might extend to the two messages which
15 appear to be a play on witness A's surname? 14:14

16 CHAIRPERSON: I am happy to give that direction,
17 Mr. McDowell. It is important for the Committee that
18 witness A's identity is protected to the maximum extent
19 possible. So please any participants viewing this from
20 the public gallery should not reference the witness or 14:15
21 any nicknames and refer only to the witness as Witness
22 A.

23 151 Q. MR. McDOWELL: Thank you. So do you want to say
24 anything to the Committee about those messages, Witness
25 A? 14:15

26 A. Yeah, so essentially I saw these coming through but
27 didn't actually open them, because I thought I would be
28 referring them to the Gardaí. I had a suspicion just
29 when I turned on the phone at the vague look that I saw

1 popping up that it was going to be Dr. Chughtai. So
2 obviously there is references there where he says, you
3 know, to not contact the Gardaí. So my understanding
4 was that he knew that I probably would send them on to
5 the Gardaí.

14:15

6
7 "Witness A" is the profile name of the Instagram
8 account that I was using, but it was deactivated. As I
9 said before, I wasn't a very active member, but when I
10 was active I was on private. And when I started seeing 14:16
11 the Medical Council correspondence saying that it
12 was -- you know referring to Instagram, I started
13 deactivating it. I deactivated my Facebook, all of my
14 social media accounts, because I felt that, you know,
15 he could have been watching it.

14:16

16
17 You know, this was the first confirmation that I had
18 that he had actually been on the page, despite it being
19 private. So I actually Googled to see if you could
20 access private Instagram accounts, and you can download 14:16
21 an app which supercedes the privacy settings, and that
22 was at that time in 2020.

23
24 Basically he refers to Spain. There were posts going
25 back to 2014 about me being in Spain. There were few 14:16
26 and far between, you would again have to go into each
27 post individually to understand that they were in
28 Spain. And if you knew the town that they were taken
29 from that was in Spain, otherwise you would have to

1 Google where it was.

2
3 Then the fact that he asked me to upload pictures,
4 again I felt very objectified, I felt like it was quite
5 perverse. And despite the fact that, you know, all the 14:17
6 previous warnings not to communicate with me, not to
7 trouble me, and also his own complaint against me
8 saying that I was doing all these terrible things to
9 him, it just, it really again solidified the terror
10 that I had for this person, who just is completely 14:17
11 irrational to me, but anyway, it was very terrifying to
12 get these messages again, because of the extent of
13 desperation and, you know, the proclamations of
14 feelings as well.

15 152 Q. Yes. And given that Dr. Chughtai's name doesn't appear 14:18
16 in these messages, what's your basis for asserting to
17 the Committee that it is him who is sending those
18 messages to you?

19 A. Well, he referenced the complaint and he referenced the
20 Gardaí, and there is only one time that I have had to, 14:18
21 aside from my bike being in an attempted robbery,
22 that's the only other time that I have needed to go to
23 the Gardaí. And then again referencing an Instagram
24 that was deactivated.

25
26 Also just to note that the phone obviously wasn't
27 active, you know, so it was somebody who knew me prior
28 to August 2019 that was sending these essentially.

29 153 Q. Yes. And just to put the timing of these messages in

1 context, these messages were sent in July 2020, isn't
2 that right?

3 A. Yeah.

4 154 Q. You had made a complaint about Dr. Chughtai to the
5 Gardaí in May of 2019, isn't that right? 14:18

6 A. Yeah.

7 155 Q. The Committee has seen evidence that the Gardaí had
8 told Dr. Chughtai not to contact you any further?

9 A. Yeah.

10 156 Q. The complaint in respect of which this inquiry arises 14:19
11 had been made over a year prior to these messages,
12 isn't that right?

13 A. Yeah.

14 157 Q. So that complaint, in other words, was under
15 investigation? 14:19

16 A. Yeah.

17 158 Q. And it was also some months after Dr. Chughtai had made
18 a complaint about you to the Medical Council?

19 A. Yeah.

20 159 Q. Yes. So is there anything else that you want to say to 14:19
21 the Committee about these messages?

22 A. I suppose I am also speculating on this, but the last
23 message, which is a dot, is probably his attempt to see
24 if the two ticks go through, because most of these
25 messages the phone would have been off, so it would 14:19
26 have been one tick. So I think it was trying to see
27 whether or not the phone was being turned on
28 essentially.

29 160 Q. Yes. So then, I think, after those messages you made a

1 further statement to An Garda Síochána, isn't that so?

2 A. Yeah, so I sent on these messages to them.

3 161 Q. Yes. I wonder if the book of Garda statements could be
4 brought up on the screen please. So I think that you
5 made two further statements, one at tab 3, which is 14:20
6 dated 2nd October 2020, and one at tab 5, dated 15th
7 January 2021, is that right?

8 A. Yeah.

9 162 Q. And I am just going to read those statements into the
10 record, so if I could begin at tab 3, which is page 8. 14:20
11 And again these are both made to Garda McPartlan, isn't
12 that right?

13 A. Yeah. So I think these might have been via e-mail
14 essentially because of Covid.

15 163 Q. Okay. So you say: 14:21
16
17 "Further to my statement made to Garda McPartlan on
18 20/5/2019 regarding unwanted contact from Dr. Hassaan
19 Affa Beg Chughtai, I wish to state the following:
20
21 "On the 22/5/2019 I e-mailed Garda McPartlan
22 screenshots of the unwanted messages and calls
23 in which the numbers were withheld I believe are
24 Dr. Chughtai due to content and tone. I blocked
25 each number but another would materialise soon after.
26 I would like to emphasise that I did not initiate or
27 want any contact since this behaviour in 2016. It was
28 made very clear by both myself and the Human Resources
29 team in Mayo General Hospital in 2016 that he was to

1 leave me alone and that I did not want any further
2 contact. As already discussed I do not have messages I
3 received from Dr. Chughtai prior to March 2017. I have
4 forwarded screenshots of all unwanted communication on
5 my phone between 2017 and 2019.

6
7 "In 2017, as previously referenced in initial statement
8 I received unusual text messages and phone calls in
9 March 2017. The screenshots I have enclosed do not
10 include a message on 30/3/2017 saying 'u still don't
11 comb your hair'. I thought it as a virus or spam and
12 deleted it and also a phone call from a private number
13 on 31/3/2017. I answered the phone call while in my
14 car in Strandhill, Sligo and said 'Hello' and I heard
15 someone else whisper 'Help' and I asked, who it was and
16 they said 'you know who it is' and I said 'you have the
17 wrong number' and he said louder that he had the right
18 number.

19
20 "Following this on the same day at 15:09 hrs, 15:23 and
21 15:56 I received three unwanted messages from number
22 +447. At the time I was in Sligo and left
23 immediately for Galway as I was fearful that I was
24 being watched because I wasn't sure if he had sent the
25 message about combing my hair. On the 1/4/2017 at 9:25
26 hrs I received one unwanted message followed by two
27 more at 9:26 hrs from number +1(253). These
28 messages were traumatising as I was now in Galway and
29 the messages asked me to go to a restaurant in Galway.

1 I was very concerned about my safety so I went to Mill
2 Street Garda Station in Galway. I had asked the male
3 Garda at the front desk if I could report the
4 incidences and make a written record. He told me no
5 and to send the following message and told me how to
6 phrase it. The Garda said if he sent any more then I
7 could then make a complaint. At 11:11 hrs on 1/4/2017,
8 on advice from the Garda, I sent a message in response
9 as I was walking to the adjacent car park after leaving
10 the Station in Mill Street. The message was sent via
11 text to +44 and said 'you have already been told not to
12 contact me. Do not contact me again. I have spoken to
13 the Police about this and if you continue to contact me
14 I will have to take further action'. At 18:38hrs,
15 18:39 hrs and 18:40 hrs on 1/4/2017 my friend Claire
16 Cullen received three unwanted messages from number
17 +35383, which was Dr. Chughtai asking her to contact me
18 and could he call her. She said no at 18:40 hrs and he
19 replied 18:42hrs and 18:49 hrs. She once again asked
20 him not to message bet either at 18:50, She is willing
21 to make statement regarding this. I submitted the
22 screenshots she took to Garda McPartlan. I submitted
23 the following two messages to Garda McPartlan as they
24 were very unusual however I do not know who sent them.

25
26 "On 7/7/2017 at 00:10 hrs I received an unwanted
27 message from number +1(925), On 8/7/2017 at 00:42 hrs I
28 received another unwanted message from the same number
29 +1(925). On 26/8/2017 at 11:36hrs I received an

1 unwanted message inviting me to join Hushed from number
2 +1(613). At the time I just ignored it as I thought it
3 was a virus, When I reviewed my phone prior to sending
4 in these screen shots I realised this is an App that
5 allows you to purchase fake numbers, I remember being
6 informed at the Garda Station in May 2019 that
7 Dr. Chughtai admitted to using such Apps in order to
8 get new numbers when I had blocked previous ones in
9 order to contact me, In 2018 I received another
10 nonsensical unwanted unknown message from number
11 +353(86) on 12/6/2018 at 12:12 hrs. On the 18/5/2019
12 at 16:33 hrs I received an unwanted call from a private
13 number, I said Hello and there was silence at the other
14 end of the phone. At 17:36 hrs on the 18/5/2019 I
15 received unwanted messages from number +134, commenting
16 on my voice. Filled me with dread I asked the sender
17 'Who is this?'. However I already knew from the tone
18 of the messages and when prompted to guess I asked 'Is
19 this Hassaan?'. I blocked the number after he replied
20 to say; 'Will talk u later' at 18:20 hrs. This was
21 deeply unsettling and I do not wish to have any sort of
22 communication with Dr. Chughtai and, was shocked that
23 this was happening again.

24
25 "At 19:38 hrs on 18/5/2019 I had a missed call from a
26 private number which I did not answer. On the
27 19/5/2019 between 18:40 hrs and 18:44 hrs I received
28 unwanted messages from a different number +1(325). I
29 blocked this number too, At 19:09 hrs and 19:10 hrs on

1 the 19/5/2019 I had two missed calls from a private
2 number which I intentionally did not answer. At 19:19
3 hrs on 19/5/2019 I had another unwanted call from a
4 private number. At 19:40 hrs on the 19/5/2019 I
5 received an unwanted text messages from number
6 +353(089). On 20/5/2019 at 15:23hrs I received another
7 unwanted text message from +353(89). On 20/5/2019 at
8 15:52 hrs and 18:56 hrs I received two unwanted
9 WhatsApp messages from number +353(89). At this point
10 I was in the Garda Station speaking to Garda McPartlan
11 and showed him the incoming messages. The content of
12 these messages were deeply upsetting as he was very
13 persistent in trying to meet me in a location that was
14 very close to where I was living at the time.

15
16 "On 20/9/19 I e-mailed Garda McPartlan with further
17 screenshots of text messages and an e-mail I received.
18 In the course of ongoing case in the Medical Council
19 Dr. Chughtai e-mailed the Irish Medical Council and
20 referenced my Instagram, which surprised me greatly as
21 it was a private account and under a nick name. He
22 also mentioned a friend Shane Russell, who is willing
23 to make a statement, and who was my housemate at the
24 time. This was deeply unsettling that he targeted who
25 I was living with. When I asked Shane whether he knew
26 of Dr. Chughtai he told me he did not recall him, but
27 on searching through his phone found text messages from
28 a few months previously in June 2019. This would have
29 been soon after Dr. Chughtai was told by the Gardai not

1 to contact myself or my friends. On 08/06/2019 at
2 21:45 from +35389, Dr. Chughtai commenced communication
3 with Shane, despite it being clear that Shane did not
4 know who he was and persisted to find out more
5 information about him. The communication concluded on
6 09/06/2019 with little response from Shane. He
7 contacted Shane again on +35389 on 22/01/2020 asking
8 for a room. Again this is very strange, as Shane and I
9 were housemates at the time. We did not have any room
10 being advertised and Shane doesn't not know of Dr.
11 Chughtai. However it was clear from the e-mail sent to
12 Irish Medical Council that Dr. Chughtai knows that
13 Shane and I are friends. This harassment has been
14 deeply unsettling to me and caused huge anxiety and
15 stress regarding my safety. I am also concerned with
16 the safety of others such as my friends who he is
17 contacting and patients he is in contact with.

18
19 "Despite multiple attempts to warn him to stop from
20 several people he has continued to do so. I understand
21 that he does not response to verbal warnings to leave
22 me alone and that is why I feel it necessary to make
23 this formal complaint against him and also to the Irish
24 Medical Council. This statement was presented to me on
25 02/09/2020 and following corrections I signed
26 it on 2/10/2020."

27
28 So is there anything you want to say about that,
29 witness A? Sorry, I think we have just lost witness A.

1 CHAIRPERSON: We seem to have done all right. Witness
2 A, I don't know if you caught -- you are back with us,
3 I don't know if you caught Mr. McDowell's question
4 there, did you?

5 A. I didn't, no. 14:28

6 164 Q. MR. McDOWELL: Sorry, so I don't know when you dropped
7 off, witness A, but I just read out your statement and
8 I assume you are familiar with that and I --

9 A. Yeah.

10 165 Q. Is there anything you want to say about it? 14:28

11 A. It was just the last few lines that I hadn't heard you
12 say but I am familiar with it and, no, essentially
13 that's all fairly accurate.

14 166 Q. And the Committee has heard your evidence on all of
15 those matters already, isn't that right? 14:28

16 A. Yeah.

17 167 Q. Can I just ask you, a moment ago we touched upon
18 WhatsApp messages that were sent to you in July 2020 on
19 your old number and those messages don't feature in
20 this statement which was sent, which was finalised in 14:28
21 October 2020. Can you explain why that is?

22 A. So I started to get quite concerned that I knew that if
23 I included some of the messages to, say, the Medical
24 Council complaint, that they would be relayed on to
25 him. So I did -- I was delayed in passing those 14:29
26 messages on to both the Gardaí and the Medical Council.
27 I also had just taken up, you know, I was moving up in
28 my career and it was quite busy and I also had health
29 problems at that stage. It was actually a very

1 stressful time for other reasons. So that would have
2 also contributed to the delay.

3 168 Q. Yes, and then if we look at another statement that you
4 made, which is behind tab 2 of the book. This is a
5 second statement which also appears to be dated 2nd 14:30
6 October 2020 and I am going to read it in due course
7 but that does explain, that does deal with the messages
8 from the summer of 2020. So was it the case that you
9 compiled two statements both dated 2nd October?

10 A. Potentially, yeah. I think at that time, as I said, I 14:30
11 had some health issues, so I can't really recall
12 exactly why there were two different ones at this time.

13 169 Q. Yes.

14 A. But I think I was trying to be as comprehensive as
15 possible. 14:30

16 170 Q. Yes. So I will just read this statement. It says:
17
18 "Further to my statement made to Garda McPartlan about
19 unwanted messages and calls between 2017 and 2019 I
20 wish to state the following:
21
22 "On the 16/7/2020 between 20:28 hrs and 21:42 hrs I
23 received nine unwanted messages from number +1(203).
24 These messages include 'plz don't involve Gardai' and
25 'just give me one chance I will die without u'; and 'I
26 try to live without u and I fail ... I don't know about
27 u'. This is very shocking language and totally
28 nonsensical. It shows his lack of insight into the
29 situation despite multiple people explaining to him

1 what is going on. He also asks me to make my Instagram
2 account under the nickname "Witness A" public. On
3 17/7/2020 at 21:39 hrs I received another unwanted
4 message from number +1(203). On 19/7/2020 I received
5 another further unwanted message from number +1(203),
6 On the 16/8/2020 I forwarded screenshots of the
7 unwanted messages to Garda McPartlan by e-mail. All of
8 the messages remain on my phone which I wish to keep in
9 my possession in case the messages and call records are
10 lost or damaged when being scanned and copied by
11 Gardai, as these messages are also relevant for the
12 ongoing Medical Council case against Dr. Chughtai. I
13 can provide it if so required to support the case. I
14 can be satisfied based on the content of the messages
15 received in 2020 that they were sent by Dr. Chughtai,
16 who is still contacting me despite being told not to by
17 myself and formally by An Garda Siochana.

18
19 "It is my understanding that Dr. Chughtai said he could
20 stop to the Gardai. It is abundantly clear to me that
21 he cannot stop despite warnings from fellow colleagues,
22 Human Resources and Gardai. His continued messages are
23 interfering with my peace of mind and privacy. They
24 have been going on for over five years now. In the
25 messages he referenced my Instagram account for the
26 third time. This account has either been on private or
27 deactivated over the past few years. It is also under
28 the fake name of 'Witness A'. This means it should not
29 be accessible to anyone who I do not specifically give

1 permission to see it. I never interacted with him on
2 any social media platform or e-mail. He makes
3 reference to going to Spain. I had a picture from
4 Spain on my profile. This makes it more certain that
5 he has used another App or way of gaining unauthorised
6 access to my social media account. I have had vivid
7 nightmares about being attacked, kidnapped and being
8 brought to a foreign country against my will as a
9 result of these messages. Due to his behaviour I have
10 had to deactivate all of my social media accounts which
11 has had an impact on my ability to interact and keep in
12 touch with my friends. However this is not my main
13 concern. I am fearful of his persistent behaviour and
14 unusually dark language used in these messages. It is
15 very apparent that he has no insight into my wishes for
16 this to stop and also the gravity of his actions. This
17 has been going on over a prolonged period of more than
18 five years and this language does not seem to be any
19 less persistent. If he is using Apps to gain access to
20 my information without my knowledge I am constantly
21 fearful that he may use this to find my location, as he
22 has turned up to where I was living a few times now. I
23 believe this complaint is important not just to ensure
24 my safety but also the safety of others, including my
25 friends and potentially patients if he is working.
26 From his messages, he says he wants to catch Corona
27 Virus which is also deeply upsetting to hear as he
28 might still be working with vulnerable patients."
29

1 So is there anything you would like to say about that
2 Witness A?

3 A. So yeah, sorry, it has kind of jogged my memory, so I
4 think there was back and forth between me and Garda
5 McPartlan in regards to getting my comprehensive 14:33
6 statement signed. And when I signed the first
7 statement then I also submitted this statement.
8

9 So then he sent that back to me as an extra, but I
10 suppose there were to many statements going back and 14:34
11 forth that it is hard to keep track of them.

12 171 Q. Yes. Okay, and is there anything else you would like
13 to say before I move on?

14 A. I don't think so.

15 172 Q. Okay. So then, you will be relieved to hear this is 14:34
16 the last thing I want to ask you about, witness A; if I
17 could ask that tab 65 of the book could be uploaded and
18 put on the screen. So, witness A, could you tell the
19 Committee what this is?

20 A. So in 2021, I received again on the old phone, which 14:34
21 was deactivated since 2019, several messages from
22 several different numbers. I don't think any of them
23 were Dr. Chughtai, but they were all, I assume, male,
24 and they were referencing this advertisement. So I
25 went on to this website that I had never heard of 14:35
26 before, and essentially my understanding is that it is
27 an escort website. It references the number that I
28 hadn't give out for, you know, a couple of years at
29 this stage.

1 173 Q. So if Trialview could just scroll down a couple of
2 inches on the screen?

3 A. And it knows that I am a 30-year-old, which was
4 accurate at the time, Irish female. Why I think it is
5 relevant to include in my statement is because, one, it 14:36
6 is certainly trying to damage my reputation, and there
7 is only one person who I can think of that would do
8 that, and that's Dr. Chughtai.
9

10 And secondly, the use of the language was a bit 14:36
11 unusual, the personnel, and that kind of triggered my
12 recollection of the complaint that he had made against
13 me to the Medical Council.
14

15 I think it is in one of the -- it is on the first page, 14:36
16 it is in one of the first points he makes that I don't
17 have a balance between my personnel and professional
18 life.
19

20 Obviously I have no proof. I went and I contacted Viva 14:36
21 Street and asked them if they could give me the e-mail
22 address of the account that set this up. They couldn't
23 for GDPR reasons. They weren't particularly helpful,
24 but they did immediately take the advert down, but...
25 yeah, I found it very distressing at the time. 14:36

26 174 Q. Yes. So just for the sake of the transcript, this is a
27 screenshot from a website or an app called Viva Street,
28 and it appears to be an advertisement, and for the post
29 code certain parts of the country are given. It says:

1 "I am a woman, 30 years old, Caucasian."
2
3 And under the description it says:
4
5 "Hi, I am Irish lady providing virtual services for 14:37
6 everyone and personnel for only selected candidates who
7 can ensure privacy.. good account of BDSM products.
8 Contact me...", and then the number is given.
9
10 So the number that's given there that begins 083, was 14:37
11 that the number that you cased to use in August of '19,
12 or the number you started to use in August '19?
13 A. It is the one I ceased to use, so it is the number that
14 all the correspondence that Dr. Chughtai has sent was
15 on to that number. 14:37
16 175 Q. So then if I could ask that tab 66 be uploaded and put
17 on the screen?
18 MODERATOR: That's displayed, but it shows an error
19 sign. I think it needs to be re-uploaded.
20 MS. HORAN: Committee, you might just give us a few 14:40
21 moments just so we can rectify this tab.
22 CHAIRPERSON: we will of course. would you like us to
23 go into private session?
24 MS. HORAN: well, it should only be a few moments.
25 CHAIRPERSON: we will stay where we are, we will just 14:40
26 pause. Thank you for your patience all, and
27 particularly to our witness. Thank you.
28
29 The technology is fantastic when is works, but I am

1 sure there are frantic efforts going on behind the
2 scenes to get these documents uploaded, so I appreciate
3 that. And for the benefit of anybody who is counting,
4 I am considering tab 66 to be Exhibit 19.

5 MR. McDOWELL: Thank you.

14:40

6
7 (SHORT PAUSE IN THE HEARING)

8
9 MS. HORAN: Committee, I wonder if you wouldn't mind
10 just going into your breakout room just for the moment,
11 just so that we can get this document organised for
12 you.

14:47

13 CHAIRPERSON: We will of course, and it will give all
14 of the parties an opportunity to take a small comfort
15 break as well. So we will go into private session and
16 you can let us know when you are ready for us to
17 resume.

14:47

18 MS. HORAN: Thank you very much, apologies for this.

19
20 THE HEARING ADJOURNED BRIEFLY AND RESUMED AS FOLLOWS:

14:48

21
22 CHAIRPERSON: We are happy to continue. I now can see
23 that document, Exhibit 19, tab 66. Thank you.

24 176 Q. MR. McDOWELL: So witness A, I am sorry about the wait,
25 there are three documents now on the screen, and I take
26 it you are familiar with these?

15:05

27 A. Yeah.

28 177 Q. Could you just tell the Committee what these are?

29 A. So this is a picture from one phone of another phone,

1 so it is the phone that's in active, and it is of the
2 messages that I received following the Viva Street
3 advert listing the phone number for the inactive phone.
4
5 I actually received them all on the same day, but they 15:05
6 were sent, you can see the 18, 19, 20, I am not sure of
7 the exact day that I turned it on, but it was
8 relatively soon after the messages had started coming
9 through.

10 178 Q. Yes. And did these -- from these messages, were you 15:06
11 able to figure out that the advertisement existed on
12 the Viva Street website?

13 A. Yeah, it was only because they mentioned Viva Street
14 ad, and I didn't know what Viva Street was, so then I
15 Googled it, and I Googled my number in that, and that's 15:06
16 when it came up.

17 179 Q. Yes, and without going through each of the messages, I
18 mean on this screenshot you haven't opened the messages
19 I see but without going through each of the messages,
20 what were the correspondences messaging you about? 15:06

21 A. Most of them were very, like, short and essentially
22 suggesting that they were interested in what the add
23 offered.

24 180 Q. Yes, okay, and you made a comment about the word
25 "personnel" that appeared in the advertisement and you 15:06
26 made an observation about the phone number used in the
27 advertisement. These two things aside, how do you
28 connect that advertisement with Dr. Chughtai?

29 A. I just don't know of anyone else who would try and, you

1 know, damage my reputation and, you know, like,
2 obviously I had absolutely no interest in this sort of
3 business or behaviour and I don't know anyone who would
4 try and pretend that I did other than someone who was
5 already accusing me of, you know, pretty outrageous 15:07
6 things before and the only person I know who is doing
7 that is Dr. Chughtai. But I can't say for certain.

8 181 Q. Yes. Okay, witness A, those are all the questions I
9 have for you but I am conscious obviously you have
10 given a lot of evidence and that we have covered a very 15:08
11 long time span in the evidence and I am conscious that
12 this is your story to tell. So if there is anything
13 else you want to say to the Committee before I hand you
14 over to their questions, please feel free to do that?

15 A. I suppose, like, the time period of this is over 15:08
16 several years and I just want to reiterate that, you
17 know, at the initial onset when I worked in Mayo, I had
18 very, very little contact with Dr. Chughtai to the
19 point where, you know, the other SHOs I would have long
20 conversations with about work or, you know, what was 15:08
21 happening in the news or, you know, just as general
22 colleagues do. But I wouldn't have had even those
23 conversations with Dr. Chughtai. When I messaged him,
24 I got short responses or absent responses. He just
25 didn't respond and often he wasn't anywhere on the 15:09
26 ward. He was missing and would show up very briefly
27 and then disappear again. So, you know, from a nine to
28 five job I would probably have seen him for half an
29 hour outside of the ward rounds at most and that could

1 have been broken up into three ten-minute slots. So I
2 had very, very little contact, and I think it is
3 relevant because of the prolonged nature of all this
4 and the seriousness of it that, you know, it really
5 came from nothing.

15:09

6 MR. McDOWELL: Yes. Okay, I don't have any questions,
7 more questions for you, witness A, but the Committee
8 members may have questions for you.

9 CHAIRPERSON: Thank you very much, Mr. McDowell. And
10 thank you, witness A, for your evidence today and
11 yesterday. So I am just going to ask my Committee
12 colleagues if they have any questions. I am mindful of
13 the fact that this is one part of -- in the normal
14 course of an Inquiry, the Registrant would have an
15 opportunity to test and challenge your evidence with
16 questions and for reasons that we don't need to go
17 into, Dr. Chughtai is not available to do that today.
18 So I just want to keep that in the back of our mind but
19 I just want to ask my Committee colleagues if there are
20 any points of clarification that they would like
21 witness A while we have her to clarify?

15:09

15:10

15:10

22 MS. DEVINS: I don't have any, thanks.

23 CHAIRPERSON: Dr. Davin-Power, I think you have a
24 question.

15:10

26 QUESTIONING BY THE COMMITTEE:

27
28 DR. DAVIN-POWER: Thank you, witness A, for giving your
29 evidence. I can see there were lots of approaches to

1 try to meet up but did Dr. Chughtai ever, were you
2 aware of him ever making a physical, approaching you
3 physically outside of work?

4 A. Outside of work the only -- like, I never actually saw
5 him approach me, you know, directly but, you know, 15:11
6 obviously I was aware that he was around the area and I
7 did see him leaving the Garda station but he never, I
8 never saw him standing outside my window or anything
9 like that.

10 DR. DAVIN-POWER: Right, thank you, that's all I wanted 15:11
11 to ask, thank you.

12 CHAIRPERSON: Thank you. I have one point and I am not
13 even sure if it is a reasonable question, so
14 Mr. McGuinness might jump in and stop me if I am going
15 astray here. Just to take you back to your evidence 15:11
16 yesterday, you were talking and explaining to us about
17 this sequence of events at the outset in Mayo when you
18 first went to Dr. Lee and Medical Manpower and as a
19 result of that conversation that you had, there was a
20 meeting between Dr. Lee, Dr. Chughtai and I think 15:11
21 Ms. Kelly. You had referenced that you were taken off
22 the rota, the on-call rota, and we have heard from
23 Dr. Cullen that she was replaced onto that rota. But
24 you made reference about people not wanting to talk
25 about it or keep it amongst ourselves. Can you just 15:12
26 explain that point so I don't misunderstand that point?

27 A. So essentially the rota, I think there was maybe five
28 or six medical interns and then there was, you know,
29 another five or six medical SHOs on the rota and they

1 were tier one and then you would have the registrars on
2 the second tier. So you would always have a registrar
3 with either an SHO or an intern. So when this
4 happened, I wasn't fully removed from the rota, I was
5 just merely, you know, swapped from a Thursday to a 15:12
6 Friday. Annette Kelly was in charge of posting out
7 that rota and in subsequent months I found that I
8 actually was assigned to work under Dr. Chughtai, which
9 meant after 5 o'clock until 9am the next morning he
10 would be the sole senior colleague that I had in the 15:13
11 hospital to mind, you know, I think it was, like, four
12 medical wards. So, you know, that would mean quite a
13 lot of contact, especially late at night. And also
14 there were on-call rooms where we were permitted to
15 stay. So I was just uncomfortable with that, so I 15:13
16 asked them to not do that, but she had actually
17 scheduled me in some regard.

18
19 So when that came up and I saw the rota coming you out,
20 I felt that, I'll be frank, I felt that the initial 15:13
21 response of both Dr. Lee and Ms. Kelly was a bit
22 underwhelming and it might have exacerbated the
23 response from Dr. Chughtai because they e-mailed him
24 instead of speaking to him in person and he was abroad
25 at the time, so then I got the onslaught of the 15:13
26 messages. And then they came back and they met with
27 him.

28
29 But I felt that, you know, the one and only thing I had

1 asked for they hadn't followed through with and, you
2 know, subsequently on my end-of-year review Dr. Lee had
3 told me to kind of, you know, that they didn't really
4 want to document it too much to have it against me.

5 But I was essentially told I think mainly by
6 Dr. Lee that, you know, we didn't want to have too many
7 people knowing about this because Dr. Chughtai had
8 given him personal information about his health and
9 whatnot and, you know, that was a reason for why this
10 behaviour had happened so that, you know, to respect
11 his privacy, that it shouldn't really be advertised.

15:14

15:14

12
13 And therefore when these swaps came up, I firstly felt
14 that I didn't really, you know, I didn't really -- the
15 one thing that they should have been aware of, they did
16 schedule me to be with him. So I felt okay, well,
17 they're kind of disappointing me in that regard, so I
18 went to Dr. Cullen and said, look, would you take
19 Thursday and I'll take Wednesday. So, you know, I kind
20 of very much felt on my own. But obviously Dr. Cullen
21 was a great support at that point.

15:14

15:15

22 CHAIRPERSON: Sure, so that's very helpful because you
23 have clarified that. I was trying to understand who
24 the "we" was in that context about not disclosing it
25 amongst wider groups. So that makes perfect sense.
26 The other question I have, and again Mr. McGuinness can
27 jump in if it is not an inappropriate question, when
28 the index event happened in Mayo, you were an intern,
29 as you described the most junior member of the medical

15:15

1 team. You are now further advanced in your career.
2 Could you just tell us from the benefit of just the
3 relationships between the different, the intern, SHO,
4 registrar and the hierarchy and to what extent the
5 authority lies within that group just so that we
6 understand that?

15:15

7 A. So an intern is the first year after your medical
8 degree is complete. Often you are not expected to, you
9 know, comprehensively do a consent process or, you
10 know, there is a lot of things you wouldn't be expected
11 to know, so you are heavily supported by your senior
12 colleagues. You essentially on a medical team the
13 intern, SHOs, regs and consultant would be expected to
14 round daily on the patients between Monday to Friday
15 and the intern might be asked to take bloods or have --
16 like, for instance on this particular team I was asked
17 to have all the blood results for all the patients
18 ready and I would present them. You know, say we got
19 to Patient A, I would say these are the bloods and
20 these are the results from the scans and this is, you
21 know, and I might be tasked with writing a note, but it
22 would be very much when you are writing the note, you
23 need to say these things in the note because I wouldn't
24 necessarily be initially expected to know. But over
25 the course of internship, you know, you are brought
26 along and you are expected by the end of that to be
27 able to make some clinical decisions and also, you
28 know, advance in regards to the tasks, you know, like
29 being able to recognise acute conditions, order tests,

15:16

15:16

15:16

15:17

1 the initial investigatory tests and stabilise patients
2 in an emergency scenario to a certain point. You know,
3 so as an intern you'd carry an arrest beat, but when
4 you got to a cardiac arrest event, you might put in a
5 cannula, which would be access to getting blood but you 15:17
6 would be rest assured that there would be senior people
7 to come.

8
9 Senior house officers or SHOs, they tend to be a step
10 up from that. There is a varying level of what they 15:17
11 might be able to do. On this particular team one of
12 the SHOs had almost gotten to a completion level of
13 consultant. He had spent a long amount of time
14 training as a registrar in geriatrics, so he was I
15 suppose considered over qualified for that role but 15:18
16 that was the role he was in as he had gone back to do a
17 GP training role and he very much, you know, respected
18 the level of hierarchy. But he was very much, you
19 know, it was taken that he was very much capable and
20 able to act as a registrar. 15:18

21
22 The other SHO, again I think the other teams and
23 consultants had a lot of respect for him and he also
24 was probably a bit more advanced than the usual SHOs.
25 So the SHOs would I suppose show an intern how to take 15:18
26 bloods, how to order tests and, you know, educate them
27 a little bit but would again not be expected to know
28 everything. That would, again the registrar would be I
29 suppose considered the most experienced person on the

1 team.

2
3 And in this regard there was a definite absence of that
4 hierarchy. You know, the SHOs were obviously very,
5 very good for the standard that they were expected to 15:19
6 be but there was kind of an understanding I suppose in
7 that hospital that the registrars mainly spent their
8 time in the res and were not always the greatest
9 benefit to the team. So there were some that were very
10 good but certainly I didn't get that sense from 15:19
11 Dr. Chughtai because he was mainly absent.

12
13 And then obviously Dr. Lee would be above that and he
14 would be at the ward round, he would be in the clinics
15 and if there was any, you know, any directive, it would 15:19
16 come from him but it might be explained to myself as an
17 intern by the intermediate doctors if I didn't
18 understand what it was or needed help with it.

19 CHAIRPERSON: That's very helpful and then can I, just
20 one point that comes from that is you mentioned the 15:20
21 absence of regs or the registrars being in the res.
22 Presumably they also have commitments to study and
23 further training. So there might be lots of reason,
24 good reasons why they absent from the ward. Would that
25 be fair to say? 15:20

26 A. I suppose that would be fair to say in most
27 circumstances but in this circumstance they weren't on
28 training schemes and I got the sense that, you know,
29 there were more absences than would usually happen.

1 Normally registrars on a medical team would be helping
2 their team and would be going between patients and
3 obviously if they had a good excuse in regards to
4 training and that or research or audit or, you know,
5 the parts of training that are compulsory, then they 15:21
6 could be absent. But in this regard there wasn't
7 really ever any excuse given for that and I got the
8 sense that, you know, they were just kind of left to
9 whatever they felt necessary essentially.

10 CHAIRPERSON: Okay, and then my last question for you, 15:21
11 it relates to you describe how you were given the task
12 of pulling together the absence calendar. Is that
13 typical of a duty that would be given to an intern in
14 your experience now?

15 A. No. I suppose I was keen to help and I was happy to 15:21
16 type it up. I think Dr. Lee just, you know, understood
17 that I could type that up. In my other roles the
18 senior registrar would orchestrate the entire thing and
19 do up the calendar, but I suppose he was getting
20 involved as a consultant and he just needed someone to 15:22
21 be a scribe essentially and I was happy to do that.

22 CHAIRPERSON: That's very helpful, thank you very much
23 for clarifying those matters. I will ask Mr. McDowell
24 if there is any matter that he would like to --

25 MS. DEVINS: Sorry, chairman, may I please? 15:22
26 CHAIRPERSON: Please do.

27 MS. DEVINS: No, it is just one question of
28 clarification. Good afternoon, Witness A. I did
29 notice when your then consultant was giving his

1 evidence, he didn't refer to Dr. Chughtai as a
2 registrar, and I am wondering was he definitely a
3 registrar or somebody who has a [inaudible - lost
4 connection] --

5 A. Sorry, I think I broke up there a little bit. 15:22

6 CHAIRPERSON: So I think, Ms. Devins, you might just
7 ask that question again. You just broke up a little
8 bit.

9 MS. DEVINS: I'm sorry, sorry. Good afternoon, witness

10 A. Can you hear me? 15:22

11 A. Yeah.

12 MS. DEVINS: I just noticed when your then consultant
13 was giving his evidence, he didn't refer to
14 Dr. Chughtai as a registrar. Are you satisfied that he
15 was a registrar or somebody with his membership in 15:23
16 medicine or the equivalent?

17 A. I have no idea whether he had his membership to be
18 honest. I know that the SHOs on the team certainly
19 were, either had completed them or were on their way
20 but I hadn't -- I wouldn't be privy to that because we 15:23
21 wouldn't have conversed that much.

22 MS. DEVINS: But to your belief he was a registrar on
23 the team?

24 A. He was called the registrar, he was on the registrar
25 rota but he wasn't -- I don't know what qualifications 15:23
26 he had.

27 MS. DEVINS: Thank you very much, thanks.

28 CHAIRPERSON: Thank you, Ms. Devins. Mr. McDowell,
29 does any matter arise that you would like to follow up

1 on?

2 MR. McDOWELL: No, I will follow up on that point that
3 was just raised now in due course but we don't need to
4 trouble the witness with that.

5 CHAIRPERSON: Okay. And I might just invite 15:23
6 Mr. McGuinness to just give us, again he has already
7 given us this direction before but I would like him to
8 give this direction in your presence just so you
9 understand the context of what I am going to finish
10 with in respect of Dr. Chughtai's absence. 15:24

11
12 LEGAL ADVICE BY MR. MCGUINNESS:

13
14 MR. MCGUINNESS: Thank you, Chairman and members of the
15 Committee. Firstly could I just remind those attending 15:24
16 the hearing in whatever capacity that witness A is the
17 subject matter of an order for anonymity and that
18 accordingly she should not be identified by anyone,
19 either directly or indirectly, in any manner and that
20 would include I would think associating her with any 15:24
21 particular other witness who has given evidence.

22
23 Secondly, obviously Dr. Chughtai hasn't appeared at the
24 hearing today and the Committee has received
25 documentary evidence from the Chief Executive Officer 15:24
26 this morning in relation to the matter and my first
27 piece of legal advice to the Committee is that no
28 adverse inference should be drawn in respect of the
29 doctor's inability or unwillingness, I am not

1 categorising it either way, but the fact of his
2 non-attendance at the hearing today is of no evidential
3 significance for the Committee or the work of the
4 Committee.

5
6 Secondly, and more importantly, the Committee must at
7 all times be very conscious of its requirement to act
8 in accordance with fair procedures and with natural
9 justice and to respect the doctor's right under the
10 Medical Practitioners Act to appear at the hearing
11 represent himself and defend himself, including the
12 right to cross-examine witnesses and the right to give
13 evidence himself indeed or call other evidence. And he
14 still has that right.

15
16 Accordingly therefore, since he has not been in a
17 position to exercise right today, it is intended, and
18 this is my advice to the Committee, that the Committee
19 should afford him the opportunity of deciding to appear
20 or not on another suitable occasion and obviously to
21 indicate in advance if he requires to cross-examine one
22 or all or some of the witnesses who have given evidence
23 today.

24
25 Now, it follows from that, and this is of particular
26 relevance to witness A, that witness A's evidence may
27 not necessarily have concluded because of the
28 entitlement of the doctor to examine and contest and
29 defend himself in relation to all or any of the matters

1 which the Committee has inquired into so far.

2
3 Therefore, it is envisaged, and this is my advice to
4 the Committee, that they must give the doctor an
5 opportunity to appear and obviously furnish him with 15:27
6 the transcript of today's evidence. He has already
7 received yesterday's as I understand it from the
8 correspondence. And it will be a matter of procedure
9 then for this Committee, having been seized of the
10 matter, to come to make arrangements for another 15:27
11 sitting of the Committee in order that it would further
12 progress its business of inquiry into the complaints
13 referred to by the Professional Practices Committee.

14
15 So it follows from that that witness A must be advised 15:27
16 in the presence of the Committee that your evidence may
17 not necessarily have concluded today and
18 consequently it also appears as a matter of law that
19 the Committee, whether in public or in private, ought
20 not to discuss your evidence or the evidence of any 15:28
21 other witness or reach any conclusion or decision about
22 it in any respect until it has heard all the evidence
23 that may be presented in the case and all submissions
24 that may be made in the case and finally retires to
25 consider what decision it makes in the process. 15:28

26
27 So accordingly, chairman, that's my advice on the
28 matter at the conclusion of today's business.

29 CHAIRPERSON: Mr. McGuinness, thank you very much,

1 that's very helpful and as always very clear. So I
2 just want to conclude, witness A, by thanking you again
3 for your time today and yesterday. As you I think
4 should now understand, there is a possibility that we
5 may need to recall you to allow Dr. Chughtai to
6 cross-examine you on your evidence should he wish to do
7 that.

15:28

8
9 But I thank you again for your time, for bringing the
10 complaint to the Medical Council as well and I wish you
11 well. It is in your best interests not to discuss your
12 evidence with anyone else also so that we don't
13 contaminate your evidence as well. But again thank you
14 for your time and I hope it wasn't too disruptive to
15 you to do it over two days remotely.

15:29

16 WITNESS A: Thank you so much.

17 CHAIRPERSON: Thank you, take care.

18 WITNESS A: Bye.

19 MR. McDOWELL: So, chairperson, I am in the Committee's
20 hands as to what to do next. There are two quick
21 pieces of documentary evidence I was going to address
22 you on which will take no more than five minutes I
23 think and all of the evidence you have heard so far
24 relates to what I referred to yesterday as the first
25 limb of the case, which is the witness A limb of the
26 case. You will recall there is also a limb of the case
27 that relates to CPD, and I have all three witnesses
28 dealing with that issue available today to give today
29 if required. They are all short witnesses and if the

15:29

15:29

15:29

1 Committee were to sit until half four, I am confident
2 that they could all be heard back to back. But I do
3 appreciate we have been sitting for a long time today
4 and I appreciate people may have other commitments but
5 that's the position.

15:30

6 CHAIRPERSON: That's very helpful. Maybe I could just
7 ask my Committee colleagues to just go briefly into
8 private session just to discuss that matter. I see
9 Witness A is still connected on the screen there, so we
10 might just resolve that as well and we will be back
11 promptly to give you an update. Thank you.

15:30

12
13 THE HEARING ADJOURNED BRIEFLY AND RESUMED AS FOLLOWS:

14
15 CHAIRPERSON: I am sorry for -- there seemed to be some
16 confusion there, I got lost in cyberspace there. I
17 have discussed it with my Committee colleagues,
18 Mr. McDowell. We have had a long day, so I think our
19 preference is to rise about four or just thereabouts.

15:35

20 MR. McDOWELL: Yes.

15:36

21 CHAIRPERSON: We have been in session since nine this
22 morning on another matter, so just to keep us all
23 fresh.

24 MR. McDOWELL: I think that's fair. If it's all right,
25 I will then just defer all the CPD witnesses so they
26 can be heard on block on another date and they will all
27 finish within the hour but I would rather you heard
28 them altogether than iteratively if that's okay.

15:36

29 CHAIRPERSON: Yes, it is okay with us. I am really

1 sorry and I apologise to the witnesses for any
2 inconvenience but I think we have had made good
3 progress today getting through your witness list.

4 MR. McDOWELL: Yes, and I am also conscious that
5 Dr. Chughtai is going to have to digest a lot of
6 evidence. 15:36

7 CHAIRPERSON: Yes.

8 MR. McDOWELL: So it is probably fair to him that we
9 don't keep going with more witnesses.

10 CHAIRPERSON: That's exactly right, and as you say, 15:37
11 there is a natural break here between the allegations
12 for witness A and the CPD allegations. So again I take
13 it that the CEO will provide the transcript overnight
14 to Dr. Chughtai. We will have to identify a date for
15 the resumption of this Inquiry. I don't have dates in 15:37

16 my diary pencilled in. I rely on the excellent
17 Executive staff to coordinate the diaries, but we would
18 be anxious that this not drag out any longer than it
19 needs to be. So as soon as the parties are available
20 to continue, I am sure the Committee will make itself 15:37
21 available. But we recognise there are various
22 constraints with all the different parties.

23 MR. McDOWELL: I wonder could I just address you on a
24 couple of things if that's okay?

25 CHAIRPERSON: Please do. 15:37

26
27 SUBMISSION BY MR. McDOWELL:

28
29 MR. McDOWELL: So firstly just to sort of give a

1 housekeeping update; in terms of what I will call the
2 witness A limb of the case, there are only three more
3 witnesses for you to hear from and they will all be
4 very brief witnesses. They are Annette Kelly to prove,
5 effectively just to prove her memo of the meeting of 15:38
6 April '16 and surrounding events, and then evidence
7 from the two Gardaí to prove the statements. So they
8 are sort of technical witnesses rather than substantive
9 witnesses I think.

10
11 Then on the CPD side, there are three witnesses that
12 you will hear from and, as I say, I think those three
13 witnesses will conclude within an hour. So in terms of
14 witnesses as to fact, I think I have less than half a
15 day of evidence to go across six witnesses. 15:38

16
17 Then there is the expert evidence of Dr. Flynn. He
18 will be a little bit longer. So I think a conservative
19 estimate is that there is another day of evidence in
20 the CEO's case. 15:38

21 CHAIRPERSON: Okay.

22 MR. McDOWELL: So that's just a housekeeping update.
23 And then there are just could discrete issues I would
24 like to address with you if I can. The first is in
25 relation to Ms. Devins' question, if I could ask that 15:39
26 tab 51 of the book be brought onto the screen. This is
27 the human resources file for Dr. Chughtai and if I
28 could ask that TrialView bring to us page 130 using the
29 pagination at the bottom right rather than the

1 pagination of the file itself. So it is maybe the
2 tenth or fifteenth page.

3
4 So, as I said, Ms. Kelly is going to prove this file
5 but this is, the document that's now on screen is a 15:39
6 verification of service form and if I could just ask
7 TrialView to scroll down a little bit, you will see
8 that that is dated 17th May 2016 at the bottom right
9 and it gives the dates of exact employment about a
10 third of the way down the page from 12th January 2015 a 15:40
11 to 10th July 2016. Sorry, if you just scroll up
12 slightly. And you will see just beneath that the post
13 held is medical registrar. And just on my cursory
14 glance through that HR file, which runs to a 135 pages,
15 there are other references to Dr. Chughtai being a 15:40
16 registrar. So I think the evidence ultimately from
17 Ms. Kelly will be that he was employed as a registrar
18 at the relevant time.

19 MS. DEVINS: Thank you very much. I just thought it
20 was notable that the consultant did not so refer. 15:40

21 MR. McDOWELL: Yes.

22 MS. DEVINS: Thank you.

23 MR. McDOWELL: So then just the last thing I want to
24 address today, and I am only doing this because I want
25 to mention this matter while the evidence of witness A 15:40
26 and of Mr. Russell and of Ms. Cullen is fresh in the
27 heads of the Committee, I wonder could TrialView open
28 tab 55 of the book. So before I get into the substance
29 of this, this evidence in my submission is admissible

1 but I think that the Committee needs to satisfy itself
2 that I am correct with that and Mr. McGuinness might
3 advise you on this.

4
5 what you are going to see now is evidence that, in my 15:41
6 submission, connects Dr. Chughtai with the two Irish
7 mobile phones that were referred to in the evidence
8 today. So that's the 083 number and the 089 number and
9 the evidence is evidence received by Garda McPartlan
10 internally through An Garda Síochána and An Garda 15:41
11 Síochána had in turn contacted Irish mobile phone
12 networks to seek user details for those two phone
13 numbers, and the Gardaí received the information back
14 from the mobile phone networks and the Gardaí then
15 transmitted that information internally to Garda 15:42
16 McPartlan.

17
18 So Garda McPartlan will confirm that he received those
19 internal Garda communications. But on one view the
20 communication via mobile phone network to An Garda 15:42
21 Síochána as to who the person connected with the mobile
22 phone was is arguably hearsay on the basis that the
23 mobile phone networks aren't here to give evidence, and
24 in respect of that I would make two submissions.

25 15:42
26 Firstly, for reasons outlined to you yesterday by
27 Mr. McGuinness, you don't in all circumstances have to
28 comply strictly with the rules of evidence and in my
29 submission this type of evidence is precisely the type

1 of evidence that you can receive without formal proof,
2 and I suggest that it would be excessive and overly
3 burdensome to require the Chief Executive to call
4 evidence from mobile phone networks to prove what is
5 contained in these documents.

15:43

6
7 The other thing I would say is that under the Civil Law
8 and Criminal Law (Miscellaneous Provisions) Act 2020 a
9 change or an exception to the rule against hearsay was
10 brought about in respect of business records and those
11 are documents created in the ordinary course of a
12 business.

15:43

13
14 Now, that applies only in civil proceedings in court
15 and therefore there does not strictly apply to these
16 proceedings, but in my submission that supports the
17 view that the Committee can receive this evidence
18 because it is a loosening of the rule against hearsay
19 in respect of business records.

15:43

20
21 So for that reason I am asking the Committee to receive
22 this evidence and as rule 21 says:

23
24 "The Committee can take a view as to what weight, if
25 any, it intends to afford to that evidence in due
26 course."

15:44

27
28 And the Committee will already have heard that there is
29 other evidence in the case that connects Dr. Chughtai

1 to the mobile phones in question.

2
3 So I think that it might be appropriate for you to take
4 advice before I open these documents.

5 CHAIRPERSON: Thank you very much, Mr. McDowell. We 15:44
6 are happy to receive that advice from Mr. McGuinness.

7
8 LEGAL ADVICE BY MR. MCGUINNESS:

9
10 MR. MCGUINNESS: Chairman and members of the Committee, 15:44
11 can I respectfully advise that at this stage the
12 Committee should reserve a decision on admitting those
13 at present until we see the doctor's response perhaps
14 to an invitation to appear and see whether he takes up
15 an invitation to cross-examine and/or present any other 15:45
16 evidence. I don't want to comment on the evidence as
17 to whether Mr. McDowell has led enough evidence or not
18 to satisfy the Committee as to the identity of the
19 subscriber who is responsible or not responsible for
20 some of the texts. So could I respectfully suggest to 15:45
21 the Committee that they adjourn that issue as it were
22 until a further hearing takes place.

23 CHAIRPERSON: Thank you very much, Mr. McGuinness. I
24 am happy to take that advice wholly on board and we
25 will reserve this matter until we resume this Inquiry. 15:45
26 But I do appreciate Mr. McDowell flagging this to us so
27 we can at least give consideration to it.

28 MR. McDOWELL: Yes, in fact the only reason I was
29 raising it today is because I am worried I will forget

1 about raising it the next day but at least having it on
2 the transcript will remind me.

3 CHAIRPERSON: Indeed. That is very helpful, so thank
4 you, Mr. McDowell. Thank you for your presentation
5 today which was very clear and efficient. Any matter
6 arise from your side that we need to discuss before we
7 adjourn?

15:46

8 MR. McDOWELL: No, we will transmit the transcript to
9 Dr. Chughtai and we will try to correspond with him
10 with a view to resuming in due course.

15:46

11 CHAIRPERSON: Thank you, and obviously the Committee
12 will be quite flexible if there are some dates that
13 would work particularly for Dr. Chughtai. In fact
14 maybe that's what the CEO may be advised to do is ask
15 for his availability because we recognise we have
16 proceeded in his absence and we would like to try to
17 accommodate him if we can.

15:46

18 MR. McDOWELL: Yes. Could I also, I mean maybe this
19 doesn't need to be resolved today, but supposing for
20 present purposes that Dr. Chughtai does intend to
21 appear on the next day, would the Committee's
22 preference be that we would on the next day recall the
23 witnesses from the last two days or would the
24 Committee's preference be that we continue on with the
25 CEO's case with other witnesses? My own I suppose
26 instinctive reaction is that it might be better to
27 recall the existing witnesses if Dr. Chughtai wants
28 that to happen on the next day.

15:46

15:47

29 CHAIRPERSON: I think I would suggest that's probably

1 the most efficient way. I wouldn't want to
2 inconvenience Dr. Chughtai, particularly if he attends
3 on another day, by having more evidence out of
4 sequence. So I think it makes sense for -- let's work
5 on the assumption that Dr. Chughtai will be available 15:47
6 to resume. I know he participated at the start of this
7 Inquiry and has been unavoidably detained or not able
8 to attend for reasons perhaps beyond his control. So
9 let's do that. But I think my preference I think would
10 be that we allow Dr. Chughtai the opportunity to 15:47
11 cross-examine the witnesses that we have already heard
12 from before we call any further ones.

13 MR. McDOWELL: Very well.

14 CHAIRPERSON: Thank you very much, all. Thank you to
15 the Executive staff, the members of TrialView and to 15:48
16 Ms. Finucane, our stenographer, for your support
17 through today. This Inquiry is now adjourned.

18
19 THE HEARING WAS ADJOURNED TO A DATE TO BE CONFIRMED
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