

You paid for it. Do you remember that? A. Yes.

5479. Q. You paid for the holiday and, like a good travel agent, you compensate the passengers for the loss of their valuables. Well now, on the subject of Greece, do you remember that we had an interesting passage about the Hellenic cruise in which you said that you and your wife and children went on the top deck, "but we put the Poulsons in the bottom of the ship; it made a colossal difference." Mr. Poulson, I am sure you wish to tell the truth to the best of your ability, but on some subjects I feel perhaps you have --. Day 4. This is not just a matter of comment because it affects the bill that we can render Mr. Pottinger for his cruise. Day 4, question 2038. "Now, I look at folio 225 of your cash book, '30th June, 1966, Swanns (Hellenic) £1,978 expended in travelling and hotels? A. That is also my own family that year". "Q. How many was that? A. We had four and we had the --." "Q. Did you go together? A. Yes, sir." "Q. So that would be seven people? A. Yes, but they were in the bottom of the boat and we were in a suite. It made a colossal difference." One of your more memorable answers in this case. A. Well, it was memorable because for the simple reason that it was the fact. I remember we were on that deck. There were only two.

5480. Q. You see, Mr. Poulson, companies keep their documents quite a long time, and I have here a receipted invoice for this holiday to be taken in August/September, 1966, booked in November, 1965, through Messrs. Swann, promenade cabin for you and Mrs. Poulson, 325 guineas. Promenade cabin -- each, yes - rate per person. Promenade cabin for the girls, 290 guineas each. "Upper, two-bedded with shower and toilet, Mr. and Mrs. Pottinger, 310 guineas". And the Pottinger boy, Master Neil, appears to be his name, 295 guineas. So all you saved by putting the Pottingers in the lower berth was 30 guineas? A. Well, I thought it was a lot more than that, sir. I am sorry.

5481. Q. So that represents an outlay of something like 800 guineas on the Pottingers' cruise ---

MR. SAFFMAN: Is my learned friend sure that the lower cabin was 295 guineas each, or 295 guineas for the cabin, because from my limited experience of travel agents' brochures, it seems impossible ---

THE DEBTOR: Well, I mean, this is what I understood.

5481. MR. MUIR HUNTER: That is the invoice. At any rate, this is the holiday on which poor Mrs. Pottinger lost her lighter and you bought her a new one which she thought, poor lady, was gold, and you think was not. Is that right? A. I am jolly sure it was not.
5482. Q. Jolly sure it was not gold. All that glitters is not gold. Where did you buy it? A. I can't remember, sir.
5483. Q. What? A. I haven't the foggiest idea.
5484. Q. You had three principal jewellers, Mr. Poulson. You had Greenwood's, you had Fattorini's, and you had Jones'. A. Fattorini's? I never used Fattorini's.
5485. Q. We have documents relating to your purchases of valuable presents from Fattorini's. A. Well, as far as I was concerned it was Barraclough's in the old days in Leeds, and Jones' latterly, after Barraclough's went out of business, and Greenwoods'.
5486. Q. Jones' and Barracloughs'. This is the same Pottinger file. Is it right, Mr. Poulson, that from time to time you gave public figures considerably valuable gifts of gold, or silver, or the like? A. If there was any opening of a building, sir, I did, in preference to the contractor doing it, because I tried to obviate a system where the contractor later came and claimed it from me.
5487. Q. I beg your pardon? A. I only did at the openings of public buildings, because then presents are always given to the opener, and I did it in preference to the contractors. I objected to the system.
5488. Q. I am looking at some correspondence in January, 1966, where there is a letter from Mr. Anthony Crosland, the then Right Honourable Anthony Crosland, Secretary of State for Education and Science, who writes to refer to the opening ceremony at the Tong Comprehensive School. Do you remember that? A. At Bradford.
5489. Q. I will show you the original. And he said, "I am most grateful for the very beautiful coffee pot which you so kindly gave me, and my wife joins in this expression of appreciation. You gave us a quite exceptionally beautiful gift and I tremble to think how much it cost. I shall treasure it as a memory of a very beautiful building." And there is a similar letter from Mrs. Crosland herself. After that, you wrote to Mrs. Crosland saying, "Some time in the not too distant future, I hope to meet you with your

husband." Well now, do you remember that incident?

A. Yes, very well.

5490. Q. How much did it cost? A. I have no idea.

5491. Q. Well, if it was silver, was it an antique piece? A. I think so.

5492. Q. Well, it must have cost at least £500? A. No, sir. It was not anything approaching that. It was somewhere about £100, if my memory serves me right.

5493. Q. What? A. Somewhere about £100. You can get it.

5494. Q. Perhaps it was not real either? A. Well ---

5495. Q. And that was bought, we think --- A. Jones' it was got from.

5496. Q. From Jones'? A. Yes, there is no question about it.

5497. Q. Yes; well, I have the letter dated the 1st January.

A. Well, they can turn it up, can't they?

5498. Q. Well now, then there was the present for Lady Frazer.

A. Naturally, the opening of Aviemore.

5499. Q. That is right. A. Well, this is the usual thing.

5500. Q. It cost £150. Bovis were also giving a present themselves?

A. Yes.

5501. Q. And then there was the Mayoress's chain at Pontefract?

A. Yes - Deputy Mayoress.

5502. Q. Deputy Mayoress. Then you provided and paid for an eight inch silver salver presented to Councillor Mole, the Chairman of the Eston Urban District Council, did you not? A. That wasn't his name, but I probably did do at some opening.

5503. Q. Yes. I have a note here about Lady Frazer's gift, a note from yourself to Mr. Mallory, of the 10th October, 1966.

"Please ask Mr. Spence's advice on the present we should give to Lady Frazer. We will spend about £150. We are the best and biggest firm in the land and don't do things meanly. Don't forget we are against Harry Vincent here. Doubtless we won't beat him, but nevertheless we must give her something good". You were in contact with Mr. Pottinger, I see, about the Frazer gift? A. I don't recall.

5504. Q. On a letter dated the 26th November, 1966, about the opening of Aviemore, which was to be opened by the widow, Lady Frazer. A. He died three weeks before.

5505. Q. Your secretary has written, "Mr. Pottinger: Silver salver with cheque reproduced on it"; is that right? A. I've no idea.

5506. Q. It cannot be "cheque". At any rate, is this right, that

there are a number of occasions when, in connection with the completion of a work, you personally, Mr. Poulson, provided and paid for a valuable gift to the opener? A. It depended, sir. I did do it to obviate the builders from doing it and me having to face an argument on the final account because they wanted this included in the cost of their final account, and I wasn't prepared to.

5507. Q. Mr. Poulson, do you mean --- A. I preferred to pay it out of my own pocket.

5508. Q. Do you mean that the coffee pot presented by Bovis would be charged --- A. It wasn't presented by Bovis. Bovis weren't even the contractors. You have got the thing all mixed up.

5509. Q. No, Mr. Poulson, you are not following. Your surprising observation was this, that normally the present provided by the contractor would be added to the final account. A. I have been --. In the past, the practice seemed to be that they did do this and they always tried to include it in the final account, and I wouldn't pass it, so I decided that I would do it out of my own pocket so that if it was a County Council, the ratepayers - or a local authority - the ratepayers were not paying for it.

5510. Q. I am sorry, it is not "Silver salver with a cheque reproduced on it", it is "Silver Salver with a plaque reproduced on it". Now, as Bovis, in fact, gave a present to Lady Frazer on this occasion, it may be assumed that did figure on their final account? A. No, sir.

5511. Q. You took it off? A. I took far more off that final account than finally was agreed.

MR. SAFFMAN: May I ask for an indication of that file?

MR. MUIR HUNTER: It is the same.

MR. SAFFMAN: Pottinger 4?

MR. MUIR HUNTER: Pottinger 4.

5512. Q. Now, can you tell me in a sentence, Mr. Poulson, what the financial responsibility of Mr. Pottinger was for the Aviemore project? A. Nothing.

5513. Q. Nothing? A. As far as I am concerned, he was ---

5514. Q. You are quite sure he had no financial control at all?

A. None whatever, for the simple reason --. After all, it wasn't a Government thing.

5514a.Q. He was, in fact, in the Scottish Development Office, was he not? A. I think he had left at that time and been

transferred to another department.

5515. Q. Well, would you look at this letter dated the 2nd March, 1968? (Handed to debtor). A letter of the 2nd March, 1968, from yourself to Mr. Pottinger at his then private address at Bonaly Tower. Do you remember this letter?
A. No, I can't recall it, but can I have time to read it? I haven't even got a third of the way down.
5516. Q. Yes. Have you read that? A. Yes, sir.
5517. Q. Now, at this time you say Mr. Pottinger was no longer in the Scottish Development Office? A. I think you will find, if you will investigate, that he had left, but he was seconded during this development to advise Frazer on this development because he was at the Scottish Office Development Department, as you say, when Frazer was made Chairman before even this thing had ever been thought of.
5518. Q. What was your official relationship with Mr. Pottinger?
A. Just because he was a member who attended the board meetings at either Lord Frazer's own office, London, or Harwich, or later at Aviemore.
5519. Q. This is a personal letter written to him --- A. At the end of the job.
5520. Q. Attacking what is called "the lack of integrity of the Aviemore Development Company and also their obvious desire to save my fees." A. The reason for that, sir, is quite simple. I did two schemes on this site; (1) I did a scheme for what is known as the Coyland Bridge development, and we did plans, estimates, models, the lot. And then there was protracted negotiations for the site between the Laird and Lord Frazer, and he took the leading part although he was the smallest contributory financial man, and as a result he lost it, and Rank stepped in and bought it, and that appeared to be the end of any development by - in this case it was a consortium; Lord Frazer was the Chairman, although the largest amount was Scottish Breweries, and Caledonian Breweries were the others.
5521. Q. Could I just stop you, Mr. Poulson; it is not really that that I am asking you about. A. But that is what that is referring to when you read that first paragraph.
5522. Q. Then you go on to complain about Bovis, who were the main contractors, were they not? A. The reason for that, sir, is ---
5523. Q. Were they the main contractors? A. Yes.

5524. Q. You go on to complain about them, and you say this :
"The additional cost of Bovis's false accounts .." --
A. What's the position there is this, sir ---
5525. Q. Will you please listen? "The additional cost of Bovis's" -
now, this is Bovis Holdings Ltd. A. No, sir; Bovis
Contractors.
5526. Q. Bovis Contractors? A. Yes.
5527. Q. "The additional cost of Bovis's false accounts, and this is
not too strong a word, has increased our expenditure horri-
fically." Were you there telling Mr. Pottinger, a senior
civil servant, that Bovis had put in false accounts?
A. No, sir. We had a disagreement ---
5528. Q. What do those words mean in English? A. What they mean in
English is this, that we disagreed with the amounts of the
accounts put in by Bovis, and it was for a very large sum,
and we never certified the sum that they asked for; but
we understood a compromise was agreed between them and the
board, and I have no knowledge of what it was.
5529. Q. Is that what you meant by "false accounts"? A. Yes, sir,
that I didn't agree with them.
5530. Q. Inflated accounts? A. "Inflated" would have been the
proper word.
5531. Q. You go on at the end of that paragraph to say, "In fact,
the Bovis contract is a complete confidence trick as far as
what they term the 'building firm' is, in this case the
Aviemore Development Company". So you were accusing Bovis
of practising on the consortium a confidence trick. Is
that referring to the inflated accounts? A. No, sir.
I didn't agree with the Bovis form of contract, I never have
done, and I am afraid this is rather too strong English.
5532. Q. You said, "I have no intention of letting this rest".
A. Well, I didn't. I didn't certify it, and consequently
I fell out with the whole crowd of them.
5533. Q. And did you inform the authorities that you considered
Bovis's accounts to be false? A. I informed the
authorities that I couldn't agree with the accounts of
Bovis's.
5534. Q. Is there a letter to that effect? A. The certificates
prove that, sir.
5535. Q. I see. And then you go on to say this: "I shall be very
grateful if you will think about this and let Mr. Mallory" -
that is your assistant - "know .." -- A. He was the

principal man up there ---

5536. Q. Just a minute --- A. Don't call him an assistant; let's have it correct.
5537. Q. Your partner. " .. know what course of action he should take." So this is a private communication between yourself and a senior Government officer about your grievances, asking him to tell your partner what you should do? A. He was the partner dealing with this development during the time it was being erected on the site, and he was meeting Pottinger at the meetings - which I wasn't going to all the meetings - and we wanted some advice, and the person who Lord Frazer listened to more than anybody was Pottinger, so we naturally --. He was the one who was the chairman of the company, and he wouldn't listen to me.
5538. Q. Now, would you look at the date of this letter? A. Yes.
5539. Q. March, 1968. Now, you were complaining that they had cut down your fees, were you not? A. Oh, this was put down two years before this, sir.
5540. Q. You were complaining they had cut down your fees: "They have an obvious desire to save my fees." Is that right? A. Well, they didn't pay anything for the first development.
5541. Q. Well now, this is the time when you were paying for Mr. Pottinger's house, was it not? A. 1966, we are talking about, sir.
5542. Q. No; this letter --- A. Oh, yes. Look, I don't care what --. The time we are talking about in that first paragraph is the development of the Coyland Bridge site.
5543. Q. One would think that you would say to Mr. Pottinger, "Unless you can get your people to pay up, I can't pay for your house"? A. No, sir.
5544. Q. Why not? A. For the simple reason it didn't take place, and this is referring to Coyland Bridge, nothing else. We got proper fees, and the figures can be produced to show on the old Aviemore Hotel site, which is the site that has been built on, but we got no fees on the original Coyland Bridge.
5545. Q. When you were writing this letter, you were asking Mr. Pottinger to tell you what to do to redress your grievance of not being properly paid; is that right? A. Yes. And it didn't have any effect at all; we got nothing.
5546. Q. So one of the services, then, that Mr. Pottinger provided for you, apart from writing your speeches, was in

interceding for you or advising you on your dealings with your clients on the Aviemore contract? A. No, sir. In this case it was only because he was such a close friend of Lord Frazer and I thought he would be able to give me some advice as to how I could get this, but the answer was I couldn't.

5547. Q. But surely, Mr. Poulson, an ideal person; worth building many houses for, surely? A. After all, what is it? We only did the sketch plans and a block plan, but I didn't even like losing that; it might have been a fee of about £2,000.

5548. Q. This was the gentleman to whom you had promised by word of mouth to give him £1,650 towards the construction of a house which he plainly could not afford out of his own means?

A. But which I wasn't aware of at that time, until now.

5549. Q. Well now, we conclude with Mr. Pottinger by saying this. Mr. Pottinger in your opinion owes you, or your estate at least, £11,650 for the house. Why should you have paid for Mr. Pottinger's holiday? A. I wanted --. I liked his companionship, and I became a very personal friend and admired him, in his company, and it didn't matter; I mean, I was a very rich man at this time. I did it for lots of people.

5550. Q. Why should you provide Mr. Pottinger with a car? A. Same reason. No ulterior motives. I am sorry, I just ---

5551. Q. And why should Mr. Pottinger's car have been put down on your practice expenses? A. I didn't know it was.

5552. Q. You mean you never knew it was? A. Look, sir, I did not see the books. I had qualified people, I paid huge salaries, and I did not do these things personally, and nor was I consulted about it. They were done incorrectly, and I know they are incorrect, a lot of them, now because I saw the books after you gave me permission. I had never seen the books, probably, ever before.

5553. Q. Why did you provide and pay for a new Rover car for Mr. Pottinger for several years? A. The same as I did for my - you can say for any friends.

5554. Q. Yes. Did you go to Switzerland with Mr. Pottinger? We know that Mr. Pottinger went to Switzerland at your expense; did you go with him? A. No, sir. You're making me -- I couldn't believe. I've been to Switzerland, but not with him that I am aware of. I didn't know he'd been either.

5555. Q. Now, you remember we looked originally at what your income tax books showed, and do you remember we found that your income tax books showed that £4,150, being the exact sum of your second payment for Mr. Pottinger's house, was put down as a staff loan; do you remember that? A. Income tax books? I don't know what you are talking about.
5556. Q. No, no. A. You said my income tax books.
5557. Q. I did say that; but the ledgers which are kept of your accounts? A. I haven't seen any ledgers, sir.
5558. Q. Well, it was put down as a staff loan. A. So I can't have known, because I haven't seen any; nobody has shown me any.
- MR. SAFFMAN: Sir, I think there is some confusion here in the minds of Mr. Poulson and my learned friend. I think the reference to income tax books has confused Mr. Poulson.
- THE DEBTOR: Or ledgers.
- MR. SAFFMAN: If Mr. Poulson could be given to understand that it was books from which his income tax returns are prepared ---
- THE DEBTOR: The only ones I have seen are cash books.
- THE REGISTRAR: Is it in this Section 20 schedule?
- MR. MUIR HUNTER: Well, it is partly there, sir, and partly in the material from which the schedule was produced.
5559. Q. There are staff loans, Mr. Poulson, put down against Mr. Pottinger's name for, firstly, £4,150, and then £7,150. A. I haven't seen them.
5560. Q. Expenditure on Mr. Pottinger's house then appears as "other professional charges". A. I haven't seen that, sir. The only books I have seen are the three cash books, and they are not there. I have seen no ledgers nor anything else.
5561. Q. You were ultimately challenged, apparently, on this by the Inland Revenue, as a result of which your accountants said that all the payments to Mr. Pottinger were ex-gratia. Do you accept that? A. That's a gift, so it shouldn't be claimed. That confirms it.
5562. Q. What about the £11,650? A. I wasn't aware, sir, that I had done all this until you produced this. I wasn't aware that Mr. Pottinger never paid anything, until today.
5563. Q. Mr. Poulson, I am sure we are all anxious not to do anyone here who is not represented an injustice, are we not? Is it possible that some of the people from whom we are seeking to recover the cost of holidays taken in their name are not the persons truly answerable for that sum? A. I have no idea, sir.

5564. Q. Did you ever procure persons to go on holiday, Mr. 'A' in the name of Mr. 'B'? A. No, sir.
5565. Q. Are you absolutely sure? A. Well, as far as I am concerned.
5566. Q. Just take one moment to think about it because, of course, I have a letter. A. Well, I'm not aware of it, sir, but then it---

MR. MUIR HUNTER: I show the witness a letter dated the 8th June, 1964, initialled JGLP/JK, addressed to Mr. Dan Smith, extracted from a red file with a number of names on it, the first of which is Claude Harrison - general file 96.
(Handed to debtor).

5567. Q. Do you see this letter, Mr. Poulson? A. I don't recall it at all, sir, and I don't know whether it ever took place, and certainly I never saw the gentleman.

MR. MUIR HUNTER: Sir, you appreciate my difficulty in dealing with a letter of this description. I have been pursuing Mr. Dan Smith for a number of holidays, and other persons as well.

THE DEBTOR: I suggest you pursue him for this one as well.

MR. MUIR HUNTER: I feel, sir, after much thought, that I must put this letter in open court to the witness. I assure you it is a matter of some difficulty.

THE REGISTRAR: Yes.

5568. MR. MUIR HUNTER: Mr. Poulson, you would not like to say something about this, would you? A. All I'll say, sir, is that I don't recall the incident at all. I'm absolutely staggered at it, and I suggest you got the money from Mr. Dan Smith. I don't know whether it ever took place; I have never met the gentleman myself in my life.

5569. Q. Which gentleman? A. The one that's mentioned otherwise than Dan Smith.

5570. Q. Is there only one person of that name in England? A. Well, I can only recall one. I don't know anybody else. That's what --. I think it would be very wrong of you --. We don't know whether it ever took place. I think it ought to be investigated.

5571. Q. I am going to read it. It is a personal letter addressed "Dear Dan", and it is found on a miscellaneous file of your personal things, which includes, for example, the file on which was recorded the cost of having your children's portrait painted. "Dear Dan. Regarding the accommodation

for Mr. and Mrs. George Brown" - whoever they are - "at the Formentor Hotel, this has now been booked in the name of Mr. and Mrs. T. Dan Smith. I thought this should be dealt with in this way to ensure that there is no publicity." Now, which Mr. George Brown are you writing about? A. I have no idea, sir. I can only presume.

5572. Q. You mean the Cabinet Minister? A. I can only presume, I can't say any more.

5573. Q. Did you know Mr. George Brown? A. No. I have never met the gentleman in my life.

5574. Q. I am sorry; not the Cabinet Minister - Member of the Opposition. A. I have never met him.

5575. Q. Well now, you are presumably not subject to fits of derangement, Mr. Poulson; what were you thinking about when you wrote this letter? A. I have no idea. I didn't know of its existence, sir.

5576. Q. Why should you write a letter which indicates that Mr. and Mrs. 'A' are to go to a hotel as Mr. and Mrs. 'B'? A. I think --. The only thing I can think is that I was asked to do it by Smith. That's the only --. And that's why I said I think you ought to investigate and find out the facts.

5577. Q. The letter goes on: "When Mr. and Mrs. Brown arrive at the Formentor on the 11th July, they will have to say that they are the Mr. and Mrs. T. Dan Smith from Executive Travel. Mr. Wegg" - that is an executive of Executive Travel - "will, however, be giving them a letter explaining the situation to the hotel. They leave on the 26th July." A. Of course, we are all assuming this. I don't know who it is, but you're assuming its that; that's why you've made the publicity.

5578. Q. Mr. Poulson, that is a most unjust, uncalled for, remark. I asked you, "Who is the George Brown whom you are sending off on an incognito holiday"? A. I have no idea, sir, and certainly not the one you have inferred to, having never met the chap.

5579. Q. I have not inferred. How many other people did you send off incognito in this way? A. None. I didn't know of this one.

5580. Q. Well, is this not your letter? A. Oh, it's my late secretary. It's not Miss McLeod, it's Miss Ketchell.

5581. Q. Who is it, who is referred to? A. I've no idea, sir, so

it's no good. The only thing that you ought to have done, and I respectfully suggest it, you ought to have been in touch with Smith and found out what it referred to instead of creating all this adverse publicity for everybody.

There is no wonder the television ---

5582. Q. Before I part with the question that we were dealing with earlier about presentations, would you be able to remember the persons to whom presentations of valuable objects were given within the last ten years before your bankruptcy?

A. The only way I could do it, sir, is to have a list of the jobs as they were opened and see if we can remember. But I can't remember off-hand.

5583. Q. Will you undertake to assist your Trustee in making such a list and identifying articles on the invoices of your jewellers, if they are available? A. As far as invoices are concerned, I can't get any of those, sir; I haven't any.

MR. SAFFMAN: Sir, with respect, I do not see how the debtor can give that undertaking, but he can give them a list of completed contracts, and a list of invoices at the same time of articles of this nature which were supplied, and he can give an undertaking to attempt to reconcile one with the other.

THE REGISTRAR: It is an undertaking to assist.

5584. MR. MUIR HUNTER: We have another holiday, Mr. Poulson, to deal with. Do you remember I asked you about three hearings ago - 20th November - if you knew a Mr. Kelly who had apparently stayed at the Dorchester with Mr. Sales? A. No, with me.

5585. Q. And you said, "He was the chief engineer of the National Coal Board". "Why should you give him a free holiday" -

A. I did not know that he had". A. I had forgotten it. It was in 1962, I think you will find.

5586. Q. Does he live at Doncaster, do you know? A. He did, yes. I don't know now.

5587. Q. This is a letter written in manuscript by Mr. Morris to "Dear John", of the 24/3/1964, and you say he was at the time the chief engineer of the National Coal Board?

A. Yes, but that is rather --. You forget; remember, it's mining engineer.

5588. Q. And you said, "There was nothing for it" - that is the holiday - "he couldn't do anything for me." I am referring to Day 7, question 5250. On the 24th March, Mr. Kelly

wrote to you, "Please excuse this handwritten letter on this frightful notepaper, but you will no doubt understand why."

Did you understand why? A. No, I can't remember.

5589. Q. The kind of letter that could not be written in Mr. Kelly's office, was it not? "Firstly, many thanks once again for all you're doing. Secondly, I did take stock of all the civil engineers in this division and, very honestly, I felt that none of them in any way at all came up to the standard you would demand for a salary of £4,000 plus after your rather unfortunate experience with Young." So, you were asking him to recommend somebody you could employ out of his staff, were you? A. No, sir. There again, he, as I told you, was a mining engineer and there is a difference, whether you believe it or not, between civil and mining. Mr. Kelly gave me colossal help and assistance and, in fact, he was instrumental, unfortunately, and feels very --- He always felt very guilty about having recommended this man Young. If you want me to tell you the contents of that, I will tell you, but it will take his character away and --

5590. Q. Stop there, Mr. Poulson; I am quite content with your answer which would say that Mr. Kelly gave you enormous assistance. Right? A. But it was nothing to do with anything other than the professional advice of dealing with civil engineers, because I had set up this department and was having unfortunate experiences.

5591. Q. And you wrote back on the 25th March thanking him. "My reason for writing you was that I was not going to move without you advising me." So Mr. Kelly was one of your advisers, was he? A. He was advising me in connection with a re-appointment of civil engineers because I felt I was not qualified to do this, and from the experience I had previously had I would have taken anybody's advice.

5592. Q. Well now, what was Mr. Kelly thanking you for, "all you are doing"? You had arranged for him already to go on holiday to Nice, had you not? A. Yes.

5593. Q. On the 21st March you wrote to him saying -- A. And that was because of his appointment. He had recommended Young and he advised me. Now, that was a most unfortunate thing, and he --

5594. Q. No, the point is this, Mr. Poulson; you have -- A. It was for services rendered.

5595. Q. It was for services rendered? A. Rendered in advice.

5596. Q. And you sent him to Nice. "I note that you would prefer

a Peugeot, and I quite agree it would be better to stay in Nice then go from there." So, you were giving Mr. Kelly a holiday in Nice and a Peugeot to drive in and he was providing you with staff -- A. No, sir. He was advising me.

5597. Q. -- out of his own staff? A. No, he was not providing me. Even Young did not come from the Coal Board. Young came from a firm in Scunthorpe, but he had worked for the Coal Board previously.

5598. Q. So we now know from your answers on the last occasion, 20th November, that Mr. Kelly could not do anything for you -- A. He could not do anything for me with regard to the National Coal Board. That's what I was referring to, sir, because he was a mechanical engineer and he had nothing to do - he never was at any of the meetings in connection with the offices, as he was a mining engineer.

5599. Q. Now, I want to ask you about a Mr. Tunbridge. Do you remember Mr. Graham Tunbridge? A. Yes.

5600. Q. To whom you paid substantial sums of money, and you said that Mr. Tunbridge had taught you surveying. A. I didn't - it is estate agents' work.

5601. Q. And it was for that reason that you paid him these sums. That is not correct, is it? A. Yes.

5602. Q. Well now, on Day 4 at Q.2959, we asked you about Mr. Tunbridge, whose receipts, as shown on your list of donations, amount to £1,020, though that may not be complete.

MR. SAFFMAN: I am sorry to interrupt, sir, but on Day 4 there is no Q.2959.

MR. MUIR HUNTER: Day 5, I am sorry.

5603. Q. You had given this list of names and you had described Mr. Tunbridge as a consultant estate surveyor, and I asked you what did he do and you said, "Well, he was one of the most useful men I ever met in that he taught me how to assess and prepare statements at the beginning of the time when central area developments were done, and we were able in a very accountancy fashion as a result of this to prepare the full expenditure and income of the whole of the central area development, and, therefore, explain to people whether the project was viable or otherwise." And then at Q.2963. "Q. How much were you to pay him? - A. I think it was a hundred pounds a month." "Q. For teaching you your job? - A. Well, not my job, sir. After all, it was an estate

surveyor's. This was an added service that we were able, as a result of him, to give." "Q. When did you first come across him? - A. 1948." "Q. But he was definitely a real consultant? - A. Oh, yes, sir. Dealing in real things." And again you said at Q.2975. "He is a consultant." Now, do you know that the Trustee has approached Mr. Tunbridge? A. No. It hasn't been in the press.

5604. Q. I thought Mr. Tunbridge might have told you? A. I have not been in touch with Mr. Tunbridge, neither has he or anyone else been in touch with me.
5605. Q. Well now, Mr. Tunbridge, through his solicitors, has made a statement to the Trustee. He says that he first met you in 1940 when you were living in Pontefract? A. I didn't live in Pontefract in 1940 either. And I certainly didn't meet him in 1940. I met him after the war.
5606. Q. "Mr. Poulson was then building up his practice and Mr. Tunbridge was able to --" A. How could I be building up a practice in the war time, sir?
5607. Q. Alright, we will correct that, shall we, to after the war? Post-war? A. And I lived at Knottingley.
5608. Q. "Mr. Tunbridge was able to give him a certain amount of business. Mr. Tunbridge, who was an executive of British Railways, moved from Yorkshire some time in 1950 to London, where he was appointed Estate and Rating Surveyor for the Southern Region." Do you remember that? A. Yes. Well, I knew he had gone - later.
5609. Q. "Mr. Tunbridge did not meet Mr. Poulson again until 1957/58 when he met him in connection with abortive negotiations he had with a proposed developer of railway property." A. Yes, correct.
5610. Q. "The Railway Board appointed fresh developers and the new developer appointed Mr. Poulson as their architect to the scheme. Mr. Tunbridge from then on met Mr. Poulson from time to time, and on occasions introduced him to various persons whom he hoped would help him by giving him instructions." Now, that was the relationship between you and Mr. Tunbridge, was it not? A. No, sir.
5611. Q. You mean this letter is not correct? A. Well, he might have suggested it, but nothing ever came of anything, as he says, but that wasn't the relationship. The relationship was that he, as a result of all this -- this was one of the first developments in the country and it was from that that

- I was able to develop, as I stated in my last hearing.
5612. Q. "Mr. Tunbridge believes that the developers did so (inaudible)
On occasions, Mr. Poulson gave Mr. Tunbridge presents."
These presents were for these introductions, were they not?
A. No, sir.
5613. Q. What were they for? A. Because I couldn't give you a
list of the introductions and neither could he if there were
any.
5614. Q. At any rate, are you suggesting that this letter is not true?
A. It is not true as far as giving me introductions which
got me work, because there wasn't any.
5615. Q. So it is not true that Mr. Tunbridge introduced you to
developers who wished to develop railway station sites?
A. Quite correct.
5616. Q. Did you meet Mr. Tunbridge in connection with railway
station sites? A. Only Cannon Street and Waterloo.
5617. Q. And then he goes on: "He retired in November, 1963, and
he did not see Mr. Poulson again until 1969 when Mr. Poulson
offered to transfer to him the Rover car which was at that
time some years old." A. Correct.
5618. Q. What Rover car was that? A. A Rover car I had given
him -- Well, I had loaned him at that time, obviously, as
it says.
5619. Q. When? A. I have no -- I can't remember; 10, 12, 14
years ago.
5620. Q. Before he retired? A. Yes.
5621. Q. Why? A. Well, before he went to Southern Region even.
5622. Q. Why? A. He was, when he was in Yorkshire, a very good
friend of mine.
5623. Q. Why did you lend him a car? A. I can't -- Look, because
out of the goodness of my heart and nothing else.
5624. Q. It goes on: "At that time, Mr. Poulson asked Mr. Tunbridge
if he could assist him in any way by introducing him to
further work"; is that correct? A. That is correct, sir.
5625. Q. "We should add that, as we understand the position, Mr.
Tunbridge was a member of a railway committee, the con-
stitution of which changed from time to time, to whom
developers submitted schemes from time to time." Is that
right? A. Yes.
5626. Q. "In certain cases the developers had appointed Mr. Poulson
to prepare the schemes." Is that right? A. How this
all started was that --

5627. Q. Is that correct? A. No. It is correct and yet it isn't, and I think it needs an explanation.
5628. Q. "It was therefore his scheme" - that is Mr. Poulson's scheme - "which came before the committee, and to Mr. Tunbridge's recollection the committee accepted two such schemes. Mr. Tunbridge emphasizes that it was not until Mr. Poulson had been appointed by the developers that he came into contact with him." A. Correct, and he has made a mistake in the next paragraph by -- I did not do Holborn Viaduct.
5629. Q. But you did Waterloo and Cannon Street? A. Waterloo and Cannon Street, but not Holborn Viaduct. And the developer that I put them forward for originally didn't do the job.
5630. Q. Well now, it is right, is it not, that there was a close collaboration between you and Mr. Tunbridge on a number of these matters? A. Not on a number of these matters. So far as the Waterloo and Cannon Street, those were competitive and I was fortunate to be appointed by the developers because I put forward a scheme which the previous developers wouldn't go on with, but it had nothing to do with Mr. Tunbridge.
5631. Q. Which developers? A. Haley Bridge Investments.
5632. Q. Had he introduced you to them? A. No. If you look up the directors of that date you will see the answer.
5633. Q. What was the nature of Mr. Tunbridge's services? A. He didn't do any services in that.
5634. Q. And why should you pay him money? A. I didn't for that.
5635. Q. When do you say Mr. Tunbridge was teaching you to be a surveyor? A. I can't remember the dates, but it was for quite a period.
5636. Q. On any view, Mr. Poulson, it must have been in the years immediately after the war? A. Oh, yes; it wasn't before because I didn't even know him.
5637. Q. So that when we are asking ourselves what you paid Mr. Tunbridge for, it was for services other than being a surveyor? A. No, for services in connection with being an estate surveyor, but so that he could help me in preparing that sort of work in connection with town centre developments which were now beginning to come into being.
5638. Q. I suggest to you, Mr. Poulson, that these payments were made for the purposes of remunerating Mr. Tunbridge for his introductions; is that right? A. No, sir, for the

simple reason the introductions did not come from him as he says, sir. They came as a result of an original developer who didn't go on, and then the Railway Board transferred it to a second developer, and he was not -- If you look on the list of directors you will find out why I got Haley Bridge at that time.

5639. Q. I will return to Mr. Tunbridge when we have done a little more research of the files. We have some more material on him, Mr. Poulson. Now, I want to ask you some more questions about Mr. Shea. Now, in the case of Mr. Shea, you will recall that after he retired, or just before he retired from the Leeds Hospital Board, you entered into a contract to employ - I should say your company entered into a contract to employ - Mr. Shea's company as a consultant. In its final form, it was between Ropergate Services and William A. Shea & Co. Ltd., dated the 26th October, 1963, and to commence on the 1st July, 1963. In this agreement Mr. Shea's company was to be paid £2,500 a year, and such further sum each year as in the opinion of Ropergate should be reasonable. Do you remember that? A. Unfortunately, yes.

5640. Q. Now, you and Mr. Shea fell out, and it was desired to bring this contract to an end, as a result of which you ultimately paid Mr. Shea £13,333.6s.8d. Now, at £2,500 a year for the remainder of a five year contract about half way expired, that was vastly in excess of the value of his salary, was it not? A. Yes.

5641. Q. But we find that he and his solicitors are speaking about a commission to be paid to Mr. Shea on the building of the South Cheshire Hospital at Leighton. Do you remember that? A. Yes.

5642. Q. Well now, there is no contract in writing that we can find which relates to Mr. Shea being entitled to any such commission. What are the circumstances of it? A. I very much deprecated this, but I was advised and absolutely insisted on - and you have had the correspondence before from Mr. Marr; he was the person who told me I had to pay it.

5643. Q. You may take it, Mr. Poulson, that this claim for commission on the South Cheshire Hospital in favour of Mr. Shea, an officer or former officer of the Hospital Board, was entirely unknown to us until Tuesday of last week. A. Well, it was on Mr. Marr's file, or should have been, and you told me

you had Mr. Marr's file.

5644. Q. Yes, it is not on Mr. Marr's file. A. Well, it should be, as you will obviously see.
5645. Q. Two questions arise; firstly, when did you get the contract, do you think, for the South Cheshire Hospital? A. I can't tell you, sir, I should be guessing.
5646. Q. Was it before or after Mr. Shea retired? A. Oh, it would be after, but what I deprecate, and I think the whole thing is, that I had to take Mr. Shea. I didn't want Mr. Shea in the first place.
5647. Q. Why did you have to take Mr. Shea? A. I did it at the request of the Ministry of Health.
5648. Q. To do what? A. To take Mr. Shea on as a consultant.
5649. Q. As a sort of old persons' home? A. No. He was retiring from the Regional Board and they thought he would be very useful to me and give advice. I knew he would not, I didn't like the idea, and I tried to oppose it for months.
5650. Q. Why did you give him one-third of the shares in your investment company, Ovalgate? A. I didn't, sir.
5651. Q. Somebody did - he has got them. A. Yes, but I mean there were two other people in that company as well.
5652. Q. Who gave him the shares? A. He did not get them given, he paid for them, didn't he?
5653. Q. No. Who transferred the shares to him? A. I have no idea. I didn't deal with them, sir. Sir Herbert Butcher did that, if you look up the records.
5654. Q. Do you mean the Sir Herbert Butcher who, alas, is no longer with us, gave Mr. Shea --? A. His people dealt with all the transactions and everything. His secretary --
5655. Q. Why? A. Because he was the Chairman of the company.
5656. Q. Why should a secretary of the Leeds Hospital Board be given one-third of the shares in a valuable investment property company? A. That is nothing to do with me, sir.
5657. Q. We have got the file. Well now, about this South Cheshire Hospital; how did it arise that Mr. Shea came to believe that he was entitled to a commission? A. I don't know, but I don't know whether he ever did bring it in or not. I very much doubt it. I understand that the Ministry said it had to be -- I later found out the Ministry said it had to be two hospitals, one at Airedale and one at South Cheshire, but I didn't get that until much later in the day. It had all been paid and cleared up.