

UNDER

the Inquiries Act 2013

IN THE MATTER

of a Government Inquiry into Operation
Burnham and related matters

STATUTORY DECLARATION OF CHARLOTTE SPEEDY IN RESPONSE
TO ORDER FOR DISCLOSURE OF INFORMATION

26 April 2019

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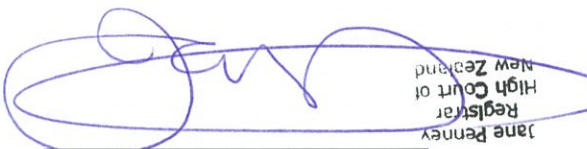
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I, Charlotte Anne Speedy of Wellington, solemnly and sincerely declare that:

1. I am the Director, Ministerial and Executive Services at the Ministry of Defence (**MOD**). I lead MOD's team responsible for the Ministry's engagement in the Government Inquiry. I am familiar with the subject matter of the inquiry and confirm that I am authorised by MOD to make this declaration on its behalf.
2. I make this statutory declaration pursuant to the Inquiry's order, dated 3 April 2019 (**Order**) where the Inquiry directed MOD to provide a list of information relating to MOD employees and associated personnel who participated in, provided advice on, contributed to or otherwise had involvement in operations relevant to the Government Inquiry into Operation Burnham¹.
3. I do not have personal knowledge of the operations listed in paragraph 3 of the Order. I have therefore made inquiries within the MOD, and with former MOD staff, to identify any person who may be covered by the Order. In particular, I made inquiries with the Secretary of Defence at the relevant time.
4. On the basis of those Inquiries, I have determined that the only person who may have had some indirect involvement with the operations in question, in the sense of being briefed on them or matters relating to them, is the former Secretary of Defence, John McKinnon. Mr McKinnon's contact details are listed in the appendix to this declaration.
5. To the best of my knowledge and belief this declaration is correct in all respects.

SWORN/~~AFFIRMED~~ at Wellington)
this 26 day of April 2019)
before me:)


Charlotte Anne Speedy


Jane Penney
Registrar
High Court of
New Zealand

¹ Order for Disclosure of Information, 3 April 2019 at paragraph 3.