

- that Peter ELLIS and his mother took photographs and were laughing;
- that the sharp sticks were stored in a wooden treasure box round like a pirate's one containing twenty pieces of paper, a lighter, and five sharp sticks. He noted that he had seen a pirate's treasure box on TV and had got toys with pirate boxes.
- that his "bum" was bleeding hard after the sticks were inserted and that after the event he was taken back to the crèche;
- that he was sodomised by "Spike";
- that he was drugged by Peter ELLIS and his mother, including pills, injections and a poisonous drink;
- that _____ had needles put in their hand, that the events took place at hospitals and restaurants and at ELLIS' friends' house;
- that ELLIS had taken him and other children to QEII park and dropped them in the deep end of the swimming pool and left them there;
- a circle game at _____ which included _____ who were wearing tins around their necks, that others around the circle were playing guitars, these included Peter Ellis' friends' and family;
- that nine children in the middle of the circle had to hit and kick each other;
- that three female crèche workers took their clothes off and pretended to have sex in the dining room of Peter Ellis' house;
- that the guitar players pretended they were cowboys and were dressed in white suits (at the previous interview they had been in normal clothes) and sang "I'm a cowboy", "Baa Baa Black Sheep", "Ring a Ring a Rosies"
- that some of the people involved had oriental eyes, some had brown skin;
- that needles were put up his penis, that his penis bled and that the people with guitars cleaned up the blood off the floor;
- that the children were taken back to the crèche via a building with a trap door (the library?) and they all fell down the trap door, falling approximately four floors to the basement;
- that the crèche workers had hurt the boys' penises and the girls' vaginas;
- that children were put in an oven;
- that children had their feet tied up, and that they were tied up in a ball and were put into an old oven which was switched on and that there was smoke in the oven, the oven was hot.

120. These allegations are not the full extent of the allegations that _____ made. The reported allegations made to his mother were even more bizarre and included the killing of a boy

marriage ceremonies, being buried alive in a cage at the grave-yard, having to dig up bodies at grave-yards and the killing of animals.

121. It is submitted that no Specialist interviewing technique could have prevented [redacted] from developing his allegations in the way that he was to do but it is submitted that the level of suggestibility in this child was such that no interview after the first one could have been anything other than tainted to a level where it could no longer be of any assistance to the Jury.

122. It is submitted that in [redacted] case given the level of parental interrogating that took place the importance of having an interview at the time suspicions/concerns arose was imperative.

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APPENDICES TO TASK TWO:

1. SUMMARY OF INTERVIEWING OI

Date	Interviewer	Allegation	Source
Prior 20 Feb		<ul style="list-style-type: none"> · hit and she cried · hit me in the treehouse and and went and told but couldn't do anything because Peter was still there - happened in toilets and sometimes in the treehouse 	
20 February 1992		<ul style="list-style-type: none"> · were both really scared of Peter - Peter used to get to show his bottom - he used to suck it, rub it with creamy stuff and water and it would sting - they used to kiss penises · someone told about Peter and she said it was a joke - Peter had pulled his pants up by then 	
late February 1992		<ul style="list-style-type: none"> · questioned re and had to drink from a cup - yucky stuff came out of it - put water from a hose into a cup and then stuff from his penis and make us drink for it - told 	
late February 1992		<ul style="list-style-type: none"> · touched her vagina one time in shower at creche when covered in sand - when I went to the toilet 	
late February 1992		<ul style="list-style-type: none"> · used to say adult words - shit, fuck up 	
late February 1992		<ul style="list-style-type: none"> · used to sniff his bottom - sniffed his bottom too 	
late February 1992		<ul style="list-style-type: none"> · Peter used to miss out at fruit time - missed out all the children he hurt - -hurt all the children - only the adults had the fruit 	

late February 1992	<ul style="list-style-type: none"> • Boy has hurt her at school - will hurt her if she tells
late February 1992	<ul style="list-style-type: none"> • Peter used to hurt me when I told said scared of going to the toilet - afraid Peter will turn up there
late February 1992	<ul style="list-style-type: none"> • Has talked about him saying he is going to get a gun
late February 1992	<ul style="list-style-type: none"> • Asked if Peter has ever touched her with his Penis - yes - where? on her vagina - hurt? yes
late February 1992	<ul style="list-style-type: none"> • Peter took her to Gardens, Hagley Park and once to Beverley Park on her own - then Debbie and Marie arrived
late February 1992	<ul style="list-style-type: none"> • Asked her if stuff came out of his penis when he was touching her? yes - where did he put the stuff? in my mouth - not like when had to suck penis - went into vagina, into tummy and out of mouth - sick and had sore tummy • Peter told wouldn't hurt for a long time now - she pulled up her nickers and skirt and went out to play • Peter did the same to .
late February 1992	<ul style="list-style-type: none"> • mentioned as having bad things done to him
late February 1992	<ul style="list-style-type: none"> • were the little girls in the park - Peter left them - found them
late February 1992	<ul style="list-style-type: none"> • He only did these in the downstairs toilet - old place
late February 1992	<ul style="list-style-type: none"> • said that she didn't have to go on any more walks to go to the toilet • She? said she told Peter not to hurt the little children because they were scared, then he kicked me in the face - my cheek still hurts

late February 1992	<ul style="list-style-type: none"> Do you want Poohs and wees on toast - yuk no thanks - Peter used to make us eat poohs 	
late February 1992	<ul style="list-style-type: none"> After first interview very upset when I suggested that she was telling lies 	
late February 1992	<ul style="list-style-type: none"> We cleaned the toilet floor etc - very worried about the smell of poohs - reminded her of Peter - used to rub it on her round her nose 	
late February 1992	<ul style="list-style-type: none"> Peter hitting her with a spikey brush 	
late February 1992	<ul style="list-style-type: none"> Peter threw spiders at her - said poisonous 	
late February 1992	<ul style="list-style-type: none"> Pulled clothes etc tight down over her face 	
late February 1992	<ul style="list-style-type: none"> frightened at the car park building 	
February 1992	<ul style="list-style-type: none"> Peter taken into the toilets and shown them his penis 	21 April statement
February 1992	<ul style="list-style-type: none"> sucked his penis and didn't like the taste had to drink from a cup - yucky stuff came out of it 	21 April statement
February 1992	<ul style="list-style-type: none"> Peter touched her vagina when she got covered in sand at the creche and he gave her a shower Peter touched her when she went to the toilet 	21 April statement
February 1992	<ul style="list-style-type: none"> Peter said adult words - shit and fuck up 	21 April statement
February 1992	<ul style="list-style-type: none"> used to sniff his bottom Peter hit and then she cried 	21 April statement

February 1992		<ul style="list-style-type: none"> • Peter hit _____ in the tree house and _____ went and told Debbie who couldn't do anything because Peter was still there - happened in the toilets and sometimes the tree house 	21 April statement
February 1992		<ul style="list-style-type: none"> • A little girl got lost in the park and Marie had to come and find her - the little girl was _____ and she was with _____ - Peter run away with the other kids laughing 	21 April statement
27 February 1992	Susan Sidey	<ul style="list-style-type: none"> • if I broke the window with the ball and I told my mum that I did it would that be the truth or a lie? probably a lie 	Interview 1 page 4
	Susan Sidey	<ul style="list-style-type: none"> • if I went swimming after school and I said today I went swimming after school would that be the truth or a lie? a lie 	Page 4
	Susan Sidey	<ul style="list-style-type: none"> • and if I said? can't you say something about Peter now • I've talked to my mummy and there's very naughty things • come to talk about Peter who used to be very nasty, used to show me his penis in the toilet • scared of Peter's penis cos it used to stick out from in the side of his body 	Page 5
	Susan Sidey	<ul style="list-style-type: none"> • kids were scared of Peter getting them to touch his penis • L: have _____ been here to talk to you? • I were watching I tried to help the little children but they just didn't believe me 	Page 6

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	Susan Sidey	<ul style="list-style-type: none"> • Peter's penis looked palewhite • Peter used to move it up and down (demos jerking motion with toy bottle) • first saw Peter's penis when I was brand new • everyday he used to do that to me and on the last day that I were going to school he used to pass the popcorn at night • told mummy about these things because she just asked me about Peter what happened to you • first thing told mummy was that Peter used to show his penis • used to suck Peter's penis, I watched them • happened in my first day 	Page 7
	Susan Sidey	<ul style="list-style-type: none"> • I know the is safe cos my mum telled me 	Page 8
	Susan Sidey	<ul style="list-style-type: none"> • <i>playing with dolls</i> • Interviewer: shall we take the clothes off and give it a bath • Peter saw her vagina on the first day of Creche at the big end in the toilets 	Page 9
	Susan Sidey	<ul style="list-style-type: none"> • L: why does Colin have to hear? • <i>Sue explains Colin (monitor) there to remind her if forgets anything and will slide notes under door</i> • <i>play with dolls in bath</i> 	Page 10
	Susan Sidey	<ul style="list-style-type: none"> • as well as Peter put his penis in my mouth, it "feeled rough" and "baby stuff came out of it" "that makes babies" • haven't seen the "baby stuff" before, mummy told me that's what it was 	Page 12 - 13
	Susan Sidey	<ul style="list-style-type: none"> • I told Marie about it, but she didn't believe me • Peter was there when told Marie and he said "I didn't do it" • Peter's penis went in my mouth once a day, Mondays and Fridays only 	Page 14
	Susan Sidey	<ul style="list-style-type: none"> • it didn't go anywhere else on my body • <i>states she is getting tired</i> • L: have more kids been in here? • Interviewer: lots of kids come here • <i>play with dolls</i> 	Page 15
	Susan Sidey	<ul style="list-style-type: none"> • Yucky stuff went into my mouth only, nowhere else 	Page 15 - 16

	Susan Sidey	<p>asks when will we be finished, ignores questions about</p> <ul style="list-style-type: none"> • have not seen that happen to anyone else 	Page 17 - 18
	Susan Sidey	<ul style="list-style-type: none"> • Indicates on doll that penis went in mouth • Penis didn't touch other part of body 	Page 19
	Susan Sidey	<ul style="list-style-type: none"> • Felt sick when got that stuff in my mouth • Indicates Peter's hands were by knee when penis went in mouth • Prompted to choose a Peter doll and a doll • demonstrates with dolls 	Page 20
	Susan Sidey	<ul style="list-style-type: none"> • chooses a Marie doll, doll tells Marie, Marie doll says "no he isn't and she just walks away" • I was on the toilet doing wees and Peter sat on me, didn't know why 	Page 21
	Susan Sidey	<ul style="list-style-type: none"> • Sucking penis happened in the toilet, nowhere else • Chooses two dolls to be • demonstrates with dolls 	Page 22
	Susan Sidey	<ul style="list-style-type: none"> • in toilet together, but only one sucking Peter's penis, avoids answering which one it was because feels sick suddenly 	Page 23
	Susan Sidey	<ul style="list-style-type: none"> • sucked Peter's penis first, Peter's hands in same place as shown earlier (knees?) 	Page 24
	Susan Sidey	<ul style="list-style-type: none"> • I play with "She's touched my vagina" • asks to go back now • touched my vagina with her vagina • no-one else has touched her vagina 	Page 25
	Susan Sidey	<ul style="list-style-type: none"> • The suck the penis thing happened in the kids toilets at the big end 	Page 26
	Susan Sidey	<ul style="list-style-type: none"> • Favourite teachers were Marie and Debbie, didn't play games with any of the teachers at Crèche • Used to walk with Peter to the Gardens and Hazel Park 	Page 28
	Susan Sidey	<ul style="list-style-type: none"> • Didn't like walks with Peter "cos they made me a bit tired" - nothing else she didn't like 	Page 29

	Susan Sidey	<ul style="list-style-type: none"> • Marie and Debbie and Mum know what's happened to me 	Page 30
	Susan Sidey	<ul style="list-style-type: none"> • can't remember what Debbie said • Debbie believed me • No kids know what happened to me, but I saw it happen to other kids 	Page 31
	Susan Sidey	<ul style="list-style-type: none"> • Peter didn't say anything when had to suck his penis • <i>asks to go again</i> • did anyone ever tell you not to tell or not? no, yes, mum, I sayed that to mum • Peter said if I give you an iceblock promise not to tell anybody or he will hurt me and burn my parents up • he gave me the ice block • don't know what stopped her from telling mum • <i>wants to go</i> 	Page 33
	Susan Sidey	<ul style="list-style-type: none"> • and did he hurt you? yes • how did he hurt you? oh no he didn't • No other part of his body touched me • Yeah, touched my fanny once • <i>"now can I go" - asks 3 times</i> 	Page 34
	Susan Sidey	<ul style="list-style-type: none"> • when did Peter touch your fanny? don't know, no he didn't, only touched me • Peter only touched me here (indicates groin area) • what did he touch you there with? I don't know what • what? his penis, I want to go 	Page 35
	Susan Sidey	<ul style="list-style-type: none"> • <i>demonstrates with dolls</i> • <i>"I don't want to", "I want to go home"</i> • her clothes were on • what about his clothes? they were on • they were on too? yeah, but not his trousers, I want to go • <i>Sue asks to come back another day to talk about the other stuff</i> 	Page 36
28 February 1992	Susan Sidey	<ul style="list-style-type: none"> • if the boy took the biscuit and he said he did would that, would he be telling the truth or a lie? a lie • <i>Sue rephrases this, and again says it is a lie</i> 	Interview 2 Page 2
	Susan Sidey	<ul style="list-style-type: none"> • we know about promises? yes, I don't want to talk about that 	Page 4

	Susan Sidey	<ul style="list-style-type: none"> • mum tells me off when she is angry • did anyone at the Creche tell you off? no, only Peter 	Page 7
	Susan Sidey	<ul style="list-style-type: none"> • Peter never used to let me get my lunch and have a break 	Page 8
	Susan Sidey	<ul style="list-style-type: none"> • is there a bath at Creche? no • what about showers? yes • did you ever have a bath or a shower at Creche? yes mum gave me one at Creche 	Page 9 - 10
	Susan Sidey	<ul style="list-style-type: none"> • continues to play with dolls 	Page 10
	Susan Sidey	<ul style="list-style-type: none"> • takes the clothes off the doll - what's that called? vagina • who has seen your gina? Peter - you can stick your finger in 	Page 18
	Susan Sidey	<ul style="list-style-type: none"> • no one else at Crèche saw my vagina • when he saw my vagina, Peter was going to the toilet, I saw "his vagina, his penis" - his penis did nothing • Peter's penis wasn't so scary for me, I was about four 	Page 19
	Susan Sidey	<ul style="list-style-type: none"> • I had my knickers up then, and my dress • Peters trousers were on him, laughs about that • I don't laugh myself, I feel sorry for the wee children, they feel a bit still frightened of Peter - don't know what made them frightened • did anything else happen to your vagina or not? mymm, that's why I came back in to tell you 	Page 20
	Susan Sidey	<ul style="list-style-type: none"> • indicates on doll that Peter's penis rubbed genital area • don't know where his trousers were when that happened • you can fit your finger up there because it's a doll 	Page 21
	Susan Sidey	<ul style="list-style-type: none"> • Penis feeled not very nice on vagina • Trousers were up • Peter's clothes were "On on on on on on and then he let go me cos" • Penis looked like "a normal penis" • was it hard or soft or hanging down or standing up or what was it doing? bit hard 	Page 22
	Susan Sidey	<ul style="list-style-type: none"> • was it standing up or hanging down? standing up 	Page 23