

# 8 THE POMBORNEIT-WEERITE FIRE

Pomborneit-Weerite is in Corangamite Shire, in Western Victoria. The town of Pomborneit is about 30 kilometres west of Colac and 160 kilometres west-south-west of Melbourne.<sup>1</sup>

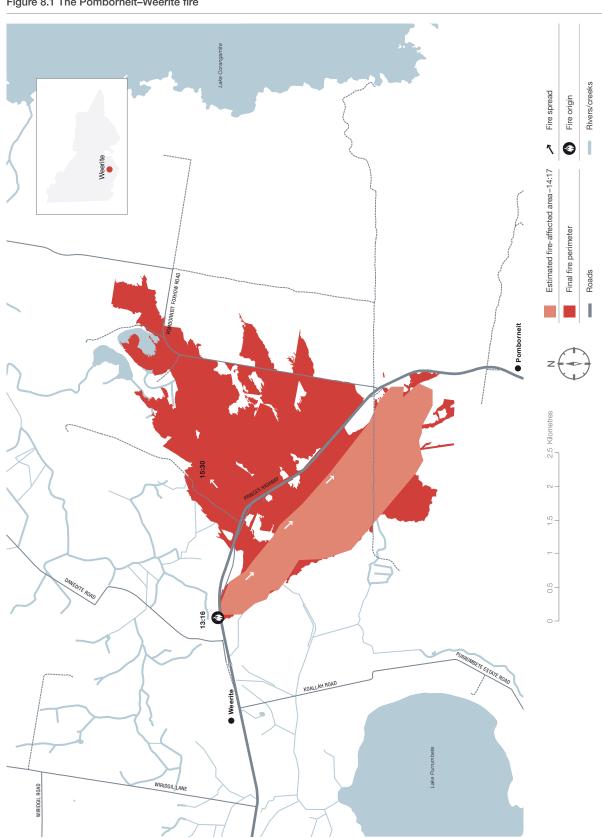
The Pomborneit–Weerite grass fire was relatively short-lived, being active for about five hours on 7 February 2009 but burning over 1,000 hectares. It started at about 13:15 and quickly burned through grazing land and across a railway line and roads. There was a rapid local response, supported by incident management based in Colac. The fire was contained on 7 February. Damage and losses were limited to stock, crops, hay, fencing and some private infrastructure.² Figure 8.1 shows the extent of the fire.

## **OVERVIEW**

Maximum temperature	The maximum temperature recorded was 45.1°C at Mortlake automatic weather station at 13:30.3
Minimum relative humidity	The minimum relative humidity recorded was 7.9 per cent at Mortlake AWS at 13:30.4
Wind	At about 13:00, the Mt Porndon fire tower recorded north-north-westerly winds of about 100 kilometres an hour, with gusts up to 113 kilometres an hour. <sup>5</sup>
	The maximum winds recorded at Mt Gellibrand AWS before the wind change were north-westerly at 90 kilometres an hour at 14:00.6
	The wind change came through at about 14:15.7
	The maximum winds recorded after the wind change were south-westerly at 115 kilometres an hour at Mt Gellibrand AWS at 17:00.8
Fire danger index	The maximum Grassland Fire Danger Index was greater than 100 at Mortlake AWS at 13:30.9
Cause	Electrical failure. <sup>10</sup>
Fatalities	No fatalities. <sup>11</sup>
Casualties	No casualties. <sup>12</sup>
Houses destroyed	No houses. <sup>13</sup>
Overall area burnt	1,008 hectares. <sup>14</sup>
Firefighting resources	On 7 February, 191 CFA and 50 NEO personnel attended the fire. They were supported by 45 CFA appliances, 10 NEO appliances and 2 aircraft. <sup>15</sup>

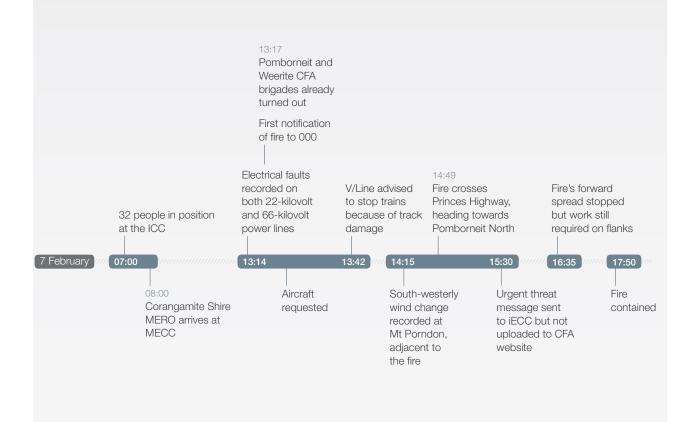
Figure 8.1 The Pomborneit-Weerite fire

Source: Exhibit 994 - Weerite Fire - Fire Spread Map. 16



# Pomborneit-Weerite 7 February

The following time line summarises events associated with the Pomborneit–Weerite fire. For the most part, the times given are approximate. Further details about the events are provided in the accompanying narrative.



### 8.1 SEQUENCE OF EVENTS

#### 8.1.1 PREPARATION

On 6 February Mr Malcolm Fallon, Operations Manager for Country Fire Authority Region 6, held a teleconference with representatives of local councils, the Department of Human Services, the State Emergency Service and Victoria Police. On the basis of his understanding of the statewide CFA teleconference of 3 February, he explained the need for preparation and asked each agency for a verbal report to confirm the level of preparedness. Each municipality said it was ready.<sup>17</sup>

Mr David Rourke, Major Projects Manager in South-West Region for the Department of Sustainability and Environment, arranged for Corangamite Shire to ensure that the Municipal Emergency Coordination Centre and its staff were ready for an immediate start on 7 February.<sup>18</sup>

Because of a shortage of incident management team personnel, CFA Region 6 established only one incident control centre, at Colac. Mr Fallon said the region runs only one level 3 ICC in order to avoid problems with transferring IMT staff between incidents.<sup>19</sup>

Mr Fallon was the pre-designated level 3 Incident Controller, regardless of where a fire started. Before 7 February all major and support roles in the Colac IMT had been filled, including a Safety Adviser.<sup>20</sup>

Elsewhere in the region—at Lismore, Camperdown, Cobden and Timboon—level 2 IMTs had been established and were ready to function. If necessary, the level 2 ICCs could function as divisional commands of the Colac level 3 ICC.<sup>21</sup>

Table 8.1 summarises the state of preparedness for the Pomborneit-Weerite fire.

Table 8.1 The Pomborneit-Weerite fire - IMT preparedness summary

Pre-designated level 3 ICC	Yes <sup>22</sup>
Pre-formed IMT at ICC	Yes <sup>23</sup>
Pre-identified level 3 IC	Yes <sup>24</sup>
Pre-identified IMT members	Yes <sup>25</sup>
Time fire started	Approx 13:17 <sup>26</sup>
Full IMT in place by	07:00, 7 February 2009 <sup>27</sup>
Safety adviser appointed	Yes <sup>28</sup>

#### 8.1.2 7 FEBRUARY

By 07:00 on 7 February 32 personnel from the CFA and the Department of Sustainability and Environment jointly staffed the IMT and were at the ICC 'ready to go'. During the course of the morning IMT personnel were updated on the weather and available resources.<sup>29</sup>

At 08:00 Mr Kevin Kittel, the Corangamite Shire Municipal Emergency Resource Officer, arrived at the Municipal Emergency Coordination Centre. The primary location for the MECC on 7 February was the Killara Centre in Camperdown. The MECC was made ready, and the Colac ICC was advised of this by email. Senior Sergeant Stephen Thompson, the Municipal Emergency Response Coordinator, inspected the MECC at 10:00 and returned at 12:00.30

In the field, preparations were also well advanced. Pomborneit and Weerite fire crews were pre-positioned at their local stations; they were 'dressed ready to go', which was their practice on fire ban days. At 13:00 six to eight members were in the station, a further 10 to 15 members were available at short notice from their homes, and a further member was at the Mt Porndon fire lookout.<sup>31</sup>

#### Origin and cause

At about 13:15 on 7 February Ms Kerry-Lynne Callow was travelling along the Princes Highway from Camperdown towards Geelong. She described what she saw as she drove over the Weerite railway overpass:

In front and to my left down the road was a flare, which was quite unusual. It only lasted ... one, two [or] three seconds. It wasn't a long event. It appeared to be behind—in the same line of vision was a single pole with a transformer on it and, while it appeared to be behind that, it was suspended in the air. It was a blue flare that was stationary a while and then sort of rolled back on itself in a yellow flame.<sup>32</sup>

She went on to say the flare was at the height of the wires, suspended in mid-air, and was similar to blanket-style lightning or a broad flame that was there for a couple of seconds and then 'just rolled back'.<sup>33</sup>

While she was watching the transformer on the left-hand side of the road, Ms Callow became aware that there was a fire on her right: 'It was a fairly intense little fire', with naked flames, directly on the south side of the road (the opposite side to the Colac–Camperdown power line), 'probably 6 by 6 feet' with 'flames at waist height'. As soon as it was safe to do so, Ms Callow parked her car and phoned 000 on her mobile phone. She described the fire as a fast-moving grass fire. The 000 operator recorded the location of the fire as on the Princes Highway, near Danedite Road, at Weerite.<sup>34</sup>

Ms Regina Beal lives in a house on a farm at Weerite, 2.3 kilometres from the intersection of the Princes Highway and Danedite Road. The Commission received a statement from her but she was not able to attend personally to give evidence. It was thus not possible to properly assess the reliability of her account. Her statement indicates that after lunch on 7 February, she saw a silver flash near the rail overpass and noted that the power in her house faltered; she saw smoke nearby and phoned 000. Records show the first emergency call was received at 13:17.35

The Colac–Camperdown power line, constructed in 1949 and operated by Powercor, runs along the north side of the Princes Highway at Weerite. The poles carry three rows of 66-kilovolt copper conductors, which between them carry 66,000 volts, and below them one row of 22-kilovolt aluminium conductors, which between them carry 22,000 volts. At 13:14 on 7 February the Colac–Camperdown power line recorded electrical faults on both the 22- and the 66-kilovolt power lines. The latter tripped to 'lock out', stopping the flow of electricity along that section of the line.<sup>36</sup>

The electrical fault occurred as a result of the clashing of the 66- and 22-kilovolt conductors or the 22- and 22-kilovolt conductors, or both. There is a long history of clashing conductors on this line in the general area of the clashing that occurred on 7 February. The clashing caused the emission of molten particles, which ignited vegetation by the side of the Princes Highway.<sup>37</sup>

Chapter 4 in Volume II discusses in detail systemic matters relating to fires caused by electrical incidents.

#### Fire run, response and management

Shortly before 13:06 the electricity flickered at the CFA station in Pomborneit. On the basis of past experience Mr Terrence Place, CFA captain for over 30 years, left the station in a slip-on unit to check the Colac–Camperdown power line on the Princes Highway, expecting a fire caused by electrical assets. When he saw fire he called the Camperdown station, seeking additional resources. Because of the potential danger, the Pomborneit tanker also turned out, as did a vehicle from the Weerite CFA station.<sup>38</sup>

The Chocolyn, Stonyford and Tesbury brigades were paged at 13:17, along with the Weerite and Pomborneit brigades. The Weerite brigade turned out within minutes. Soon after, the Camperdown, Tesbury and Chocolyn brigades were all in attendance.<sup>39</sup>

Mr Place described the speed of the fire's spread: 'I have been to plenty of fires in my time  $\dots$  and the speed of [this] fire was just phenomenal'.

Initially Mr Place was the local Incident Controller. Once it had been established that the fire could not be quickly brought under control, however, the Deputy Group Officer directed him to establish and crew an operations point at the Pomborneit station, where there was better radio coverage and the ability to link to the level 3 Colac Incident Management Team.<sup>41</sup>

That IMT was situated at the DSE office in Colac, which has been the region's incident control centre for eight years. It was well prepared early on 7 February and had just completed a state update briefing when the fire was reported. Mr Fallon was the pre-designated Incident Controller for 7 February and assumed that position.<sup>42</sup>

At 13:21 the State Air Desk was asked for two aircraft to assist with firefighting. Three aircraft had been made available for the region—two water bombers and one observation aircraft. At the time the water-bombing aircraft could not be deployed because of the weather conditions. The observation aircraft did, however, become airborne.<sup>43</sup>

After a request at 13:34 for a further 10 tankers, the response continued to build. The fire was still travelling at speed: firefighters' reports to the Incident Controller noted that the fire travelled 4 to 5 kilometres in about seven minutes.<sup>44</sup>

The initial run of the fire was south-easterly, crossing and damaging the Geelong–Warrnambool railway line, then running parallel to the line. V/Line was contacted at 13:42, so that it could stop trains using the damaged line.<sup>45</sup>

The first urgent threat message was posted on the CFA website at 14:15, for Scollers Road, Caters Road Settlement and Swan Marsh.<sup>46</sup>

The expected south-westerly wind change was reported as passing Mt Porndon, about 5 kilometres south of the fire area, at 14:15. The change arrived earlier than expected and pushed the fire north-east, towards Lake Corangamite. The south-westerly wind fanned the fire: flames up to 6 metres high were reported by ground observers.<sup>47</sup>

Personnel at the fire ground were not warned before the south-westerly wind change. There were no red flag warnings of the arrival of the change. Mr Mark Gunning, a CFA Fire Investigation Officer, was on the fire ground during the afternoon. He expressed concern about warnings: in his opinion, information about the wind speed and change was 'ad hoc', and he said very little information was provided about the approaching front.<sup>48</sup>

Mr Fallon acknowledged that there was little warning of the wind change. He explained that Colac ICC would usually receive warning of the change as it passed through Cobden, Mt Porndon or Camperdown, to the west. Upon that information being received from these localities, in normal circumstances it would be conveyed to the fire ground. Mr Fallon told the Commission that on 7 February the change reached the fire ground at exactly the same time as it reached these other areas, making it impossible to provide prior warning.<sup>49</sup>

At 14:25 an awareness message was posted for Pomborneit, Stonyford and Swan Marsh.<sup>50</sup>

The fire then crossed the Princes Highway at 14:49 and headed north towards Pomborneit North. During the next one-and-a-half hours it burned unchecked, heading in a north-north-easterly direction towards stony country.<sup>51</sup>

At about the time the fire crossed the Princes Highway a helicopter positioned at Colac was able to become airborne. It dropped two loads of water and was then retasked to fires near Kinglake, which were considered a higher priority. Containment lines and the firefighting effort prevented the fire entering the Stony Rises (elevated basalt lava flows north-east of Pomborneit), which, because of the rocky terrain, would have increased the firefighting difficulty and greatly extended the time and effort required on the fire ground.<sup>52</sup>

At 15:30 an urgent threat message from the Colac Incident Management Team was sent to the integrated Emergency Coordination Centre. The 15:30 message was not, however, posted on the CFA website. It also took more than 25 minutes for iECC staff to upload a subsequent urgent threat message.<sup>53</sup>

The fire's forward spread was halted at 16:35, but work on the flanks was still required.<sup>54</sup>

At 17:43 advice was received from the operations point that 'control status' was not far away. Considerable damage to rail sleepers on the Melbourne–Warrnambool line was also reported. By this time the fire was said to be quiet with an occasional flare-up.<sup>55</sup>

At 19:18 a message was posted on the CFA website, saying that the threat had been downgraded to alert status.<sup>56</sup>

Emergency relief centres were established at the Camperdown Community Centre and the Colac Performing Arts Centre. These were closed at about 20:30 because the 10 people who had used them moved to a local hotel.<sup>57</sup>

The Municipal Emergency Coordination Centre was closed at about 22:30 on 7 February.<sup>58</sup>

The fire was listed as contained at 17:50 on 7 February. In all, 191 CFA and 50 Networked Emergency Organisation personnel attended the fire, supported by 2 NEO dozers and 2 aircraft. In all, 1,008 hectares were burnt, but damage and losses were limited to stock, crops, hay, fencing and some private infrastructure.<sup>59</sup>

#### 8.2 CONCLUSIONS

The Commission was informed that the level of planning was the highest it had ever been for the region. In the Commission's view, this high level of preparedness helped the Colac Incident Management Team operate cohesively on the day, given the nature of the fire the team faced.<sup>60</sup>

From early on the fire moved very quickly. Mr Place said that, had there not been the rapid initial response, there would have been more serious consequences. He thought that the rapid initial response helped greatly to limit the fire's impact.<sup>61</sup>

The Commission notes the construction of containment lines in an effort to prevent the fire reaching the Otway Range. This appeared a prudent measure, as it was suggested to the Commission that, were it not for the earlier than expected wind change, the fire may have reached the Otway Range.<sup>62</sup>

The messages issued by the IMT were timely and clearly described the fire and its direction. There was also clear advice in the threat messages for road closures during the afternoon. Delays in uploading messages at the integrated Emergency Coordination Centre, while concerning, do not appear to have had any adverse impact on how the fires were fought or on community safety. Advice on the closure of the Geelong–Warrnambool railway line and the Princes Highway appears to have been acted on without incident. Traffic diversions were identified, and the iECC was notified.<sup>63</sup>

At times, communications between the ICC and the Regional Emergency Coordination Centre were not good, and the incident management changeover plan was delayed on the afternoon of 7 February.<sup>64</sup> These deficiencies did not, however, materially impair incident management.

Requests to the Municipal Emergency Coordination Centre for equipment such as water tankers and graders were received and acted on, and the equipment was despatched. It was reported that the MECC had difficulty obtaining from the Colac ICC reliable information about the location and movement of the fire. At times this resulted in the MECC having difficulty directing tankers and graders to where they were needed. Overall, though, planning and coordination between municipal, police and emergency services officers in response to the Pomborneit fire appeared sound.<sup>65</sup>

Mr Fallon noted the close cooperation between the CFA and DSE in his region. He stated that both agencies had developed a model relationship that continues to strengthen, this being 'testament to the years of hard work put into the region by both organisations'.<sup>66</sup>

- 1 Exhibit 677 Statement of Kittel (WIT.4004.001.0001) [10], Attachment 1 (WIT.4004.001.0016) at 0017
- 2 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [48], [55]-[58]; Exhibit 786 Statement of Clow (WIT.3004.034.0004) [19]
- 3 Exhibit 4 Supplementary Statement of Rees (WIT.004.002.0001) at 0011
- 4 Exhibit 4 Supplementary Statement of Rees (WIT.004.002.0001) at 0011
- 5 Exhibit 305 Statement of Place (BFP.005.001.0028\_R) [21]
- 6 Exhibit 22 Statement of Williams, Annexure 1 (WIT.013.001.0012) at 0050
- 7 Exhibit 4 Statement of Rees (WIT.004.002.0001) [68]; Rees T64:27–T64:30
- 8 Exhibit 22 Statement of Williams, Annexure 1 (WIT.013.001.0012) at 0050
- Exhibit 4 Supplementary Statement of Rees (WIT.004.002.0001) at 0011. Note that, although the evidence refers only to the Fire Danger Index, because of the geographic nature of the Pomborneit–Weerite area it is likely that this was measured using the Grassland Fire Danger Index.
- 10 Exhibit 311 Event Record 7 February (PAL.003.001.0322); Exhibit 289 Statement of Vercelli (WIT.3020.002.0093) [28]–[33]; Exhibit 432 PSCC Event No. 3196 (PAL.009.001.1011); Exhibit 432 PSCC Event No. 3416 (PAL.009.001.1022; Exhibit 432 Event No. 11285 (PAL.009.001.1163); Exhibit 432 Event No. 12463 (PAL.009.001.1172); Exhibit 432 Event No. 13219 (PAL.009.001.1176); Power T9859:10–T9860:27, T9862:7–T9862:18, T9863:2–T9863:8, T9864:1–T9864:16, T9866:28–T9867:3, T9867:6–T9867:20; Polvere T7986:27–T7986:30; Blackburn T9902:7–T9902:14, T9907:15–T9907:27

- 11 Exhibit 3 Statement of Rees (WIT.004.001.0001) at 0102
- 12 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [58]
- 13 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [56]-[58]; Fallon T7844:21-T7844:23
- 14 Exhibit 786 Statement of Clow (WIT.3004.034.0004) [19]
- 15 Exhibit 939 Details Regarding Emergency Response (CFA.600.005.0195) at 0195, 0198; Exhibit 939 Day by Day Breakdown Pomborneit (DSE.HDD.0048.0545\_10); Exhibit 939 Aircraft Data 0809 (DSE.HDD.0048.0544\_20) at 0544\_27
- 16 Exhibit 994 Weerite Fire Fire Spread Map (CFA.600.006.0012)
- 17 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [30]
- 18 Exhibit 450 Statement of Rourke (WIT.3024.002.0163) [20]
- 19 Fallon T7956:16-T7956:28
- 20 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [62], [64]; Fallon T7956:29–T7956:31; Exhibit 548 Correspondence Safety Advisors (CORR.0911.0107\_R)
- 21 Fallon T7957:1-T7957:15
- 22 Fallon T7956:16-T7956:28
- 23 Fallon T7956:29-T7956:31
- 24 Fallon T7840:2-T7840:9
- 25 Fallon T7956:29-T7956:31
- 26 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [48]
- 27 Fallon T7956:29-T7956:31
- 28 Exhibit 548 Correspondence Safety Advisors (CORR.0911.0107 R)
- 29 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [62], [64]; Fallon T7956:29–T7956:31
- 30 Exhibit 677 Statement of Kittel (WIT.4004.001.0001) [39], [47]-[49], [52]-[54]
- 31 Fallon T7845:11-T7845:19: Place T7866:2-T7866:8
- 32 Exhibit 302 Statement of Callow (WIT.7511.002.0001\_R); Callow T7847:5-T7847:6, T7847:22-T7847:24, T7848:17-T7848:26
- 33 Callow T7854:8-T7854:14
- 34 Exhibit 430 Triple Zero Calls Transcript (BFP.006.001.0001) at 0002–0003; Exhibit 302 Statement of Callow (WIT.7511.002.0001\_R) at 0001 R; Callow T7850:21–T7851:23–T7851:27
- 35 Exhibit 314 Statement of Beal (VPO.001.027.0015\_R) at 0016\_R; Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [48]; Exhibit 430 Triple Zero Calls Transcript (BFP.006.001.0001) at 0002–0003; Fallon T7959:1–T7959:5
- 36 Exhibit 280 Statement of Power (WIT.7002.003.0001) [9]–[10]; Exhibit 311 Event Record 7 February (PAL.003.001.0322); Exhibit 302 Statement of Callow (WIT.7511.002.0001\_R) at 0001\_R; De Vercelli T7970:22–T7970:31
- 37 Exhibit 311 Event Record 7 February (PAL.003.001.0322); Exhibit 289 Statement of Vercelli (WIT.3020.002.0093) [28]–[33]; Exhibit 432 PSCC Event No. 3196 (PAL.009.001.1011); Exhibit 432 PSCC Event No. 3416 (PAL.009.001.1022); Exhibit 432 Event No. 11285 (PAL.009.001.1163); Exhibit 432 Event No. 12463 (PAL.009.001.1172); Exhibit 432 Event No. 13219 (PAL.009.001.1176); Power T9859:10–T9860:27, T9862:7–T9862:18, T9863:2–T9863:8, T9864:1–T9864:16, T9866:28–T9867:3, T9867:6–T9867:20; Polvere T7986:13–T7986:30; Blackburn T9902:7–T9902:14, T9907:15–T9907:27
- 38 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [69]; Place T7868:29-T7870:12, T7872:4-T7872:13
- 39 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [48], [74]; Place T7871:12–T7871:20, T7872:4–T7872:13, T7877:5–T7877:11
- 40 Place T7865:27, T7871:22-T7871:25
- 41 Place T7872:20-T7872:29
- 42 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [5], [60]-[62]; Fallon T7840:2-T7840:9, T7840:14-T7840:19
- 43 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [19], [77], [80], [128]
- 44 Fallon T7841:10-T7841:18, T7959:9-T7959:11
- 45 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [50], [79]; Exhibit 4 Supplementary Statement of Rees (WIT.004.002.0001) [66]; Fallon T7840:23–T7840:28
- 46 Exhibit 4 Supplementary Statement of Rees (WIT.004.002.0001) [73]–[74]
- 47 Exhibit 309 Statement of Fallon, Annexure 8 (WIT.3004.015.0157) at 0159; Rees T64:25-T64:30; Fallon T7841:19-T7841:31
- 48 Gunning T7910:16–T7911:8; Fallon T7960:17–T7960:31, T7962:1–T7962:11
- 49 Fallon T7960:17-T7961:6
- 50 Exhibit 4 Supplementary Statement of Rees (WIT.004.002.0001) [73]–[74]
- 51 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [96]–[106]
- 52 Exhibit 4 Supplementary Statement of Rees (WIT.004.002.0001) [71]; Fallon T7841:28–T7843:25, T7844:10–T7844:16
- 53 Exhibit 4 Supplementary Statement of Rees (WIT.004.002.0001) [73]–[74]; Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [104]–[105], [118]–[120]
- 54 Exhibit 309 Statement of Fallon, Annexure 8 (WIT.3004.015.0157) at 0160

- 55 Exhibit 309 Statement of Fallon, Annexure 8 (WIT.3004.015.0157) at 0161
- 56 Exhibit 4 Supplementary Statement of Rees (WIT.004.002.0001) [73]–[74]
- 57 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [118]; Exhibit 677 Statement of Kittel (WIT.4004.001.0001) [55], [63]
- 58 Exhibit 677 Statement of Kittel (WIT.4004.001.0001) [63]
- 59 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [48], [55]–[58]; Exhibit 786 Statement of Clow (WIT.3004.034.0004) [19]; Exhibit 939 Details Regarding Emergency Response (CFA.600.005.0195) at 0195; Exhibit 939 Day by Day Breakdown Pomborneit (DSE.HDD.0048.0545\_10) at 0545\_10; Exhibit 939 Aircraft Data 0809 (DSE.HDD.0048.0544\_20) at 0544\_27; Fallon T7834:12–T7834:18
- 60 Fallon T7955:9-T7955:12
- 61 Place T7871:27-T7872:3
- 62 Exhibit 4 Supplementary Statement of Rees (WIT.004.002.0001) [71]; Fallon T7843:18-T7843:25, T7844:10-T7844:16
- 63 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [81]–[82], [87], [104], [115]
- 64 Fallon T7963:14-T7963:29, T7962:12-T7962:14
- 65 Exhibit 677 Statement of Kittel (WIT.4004.001.0001) [48]–[49], [52]–[54], [67]
- 66 Exhibit 309 Statement of Fallon (WIT.3004.015.0001) [127]