Key Problems in LADO
(Language Analysis for the Determination of Origin)

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IAFL-10, Aston University
Outline

• What’s LADO? *Language Analysis for Determination of Origin*
• LADO in context of the asylum (RSD) process
• Sample LADO report from UK asylum process
• Problem #1: LADO by Native Speaker analysts
• Problem #2: The logic of LADO testing hypotheses
  • The nature of forensic (linguistic) evidence
  • Axioms of the *Idiolect* and of the *Speech Community*
• Problem #3: LADO testing for Native Speaker status
• Problem #4: Complex linguistic biographies
• A LADO Wish-List...
What is LADO?
Language Analysis for Determination of Origin

- New branch of applied linguistics used by govt. to process asylum seekers (ASs) claiming refugee status
- Undocumented ASs claim origin in region and/or group
- Asylum bureau tests their knowledge of region/group
  - Key component of knowledge is language competence
- Folk notion: linguistic passport to diagnose nationality
  - Lx issue: linguistic socialization occurs in speech community
- Speech elicited, analyzed for tell-tale features
- LADO report > decision-maker (appeal in tribunal)
Positions in the LADO process

• Gate-keeping mechanism employed by governments to assess claims of origin, confirm true & deter false ones.

• Key institutional positions:
  – Government immigration bureau: CW, interviewer, (linguist)
  – Analysis firm: linguist, non-expert native-speaker (NENS) analyst (= native speaker w/o extensive scientific training)
  – Legal system: Immigration Judges, lawyers query lix evidence
  – Independent expert: academic linguist, interpreter

• What must RSD stakeholders know to commission, produce, evaluate, reliably interpret linguistic evidence?

• How do their knowledge/beliefs about Native Speakers, contact & multilingualism influence the LADO process?
Gate-keeping devices in LADO

- **Physical:**
  - Fingerprints:
  - DNA:

- **Social/linguistic:**
  - Incl. LADO
Guidelines for best practice

- As a result of linguists’ growing awareness of cases, efforts to codify best practice began to occur in...

- **2003:** report by Eades, Fraser, Siegel, McNamara & Baker
  - Study of 58 Australian Refugee Review Tribunal cases
  - Language analysis by overseas agencies based on ‘folk views’
  - Such LADO by NENS found “not valid or reliable”; IAFL endorsed

- **2004:** L&NOG “Guidelines for the use of language analysis...”
  - 19 coauthors/signers from Africa, Europe, Australia, USA (incl. me)
  - Published and discussed in peer-reviewed linguistics journals

- None yet based on systematic comparison of data from multiple sources, independent of institutional pressures

- **2010:** ESF Workshop identifies research agenda, > new players

- **2011-12:** LARG seminars focus on fundamental issues in LADO
LADO Guidelines

LARG follows up the work of the Language and National Origin Group (LNOG), the first organisation of scholars to monitor, debate and author research on LADO internationally. In June 2004 LNOG members jointly authored the influential Guidelines for the Use of Language Analysis in relation to Questions of National Origin in Refugee Cases.

- Access the Guidelines
- Endorsement of the Guidelines
- Co-authors of the Guidelines
- The Audience for the Guidelines
- Purpose of the Guidelines
- Status of the Guidelines
- Publication of the Guidelines
- Criticisms of the Guidelines
- The Future of the Guidelines

www.essex.ac.uk/larg/
Data not publicly available

"Certainty" is valued by the courts: 82% (n=57) w/unqualified certainty

Mean length (n=57): 18 mins
Example of LADO report

<table>
<thead>
<tr>
<th>Description of language(s) used</th>
</tr>
</thead>
<tbody>
<tr>
<td>Language(s)/dialect(s) spoken by the person in the recording: English</td>
</tr>
<tr>
<td>Language(s)/dialect(s) spoken by the interviewer on the recording: Krio and English</td>
</tr>
<tr>
<td>Language analysts: 247 and 207</td>
</tr>
<tr>
<td>The language analysts originate from: Sierra Leone and Nigeria and Ghana</td>
</tr>
</tbody>
</table>

**Q:** does “originate” mean “born in”?

<table>
<thead>
<tr>
<th>Direct Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>[X] Direct analysis – analysis of a recorded conversation between the person and an interviewer</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Type of analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>[X] Linguistic analysis – this analysis characterises the person’s language(s) and/or dialect(s) in terms of phonetics, morphology, syntax and lexica</td>
</tr>
<tr>
<td>[X] Knowledge assessment – this analysis examines the person’s knowledge and experiences of culture and geography of his/her stated country/region of origin</td>
</tr>
</tbody>
</table>
The Analysts


They seem to analyse many languages which they do NOT speak natively --
...but isn’t NS-hood their only qualification to perform LADO?

No linguistics degree
The Linguist

Linguists don't PERFORM the analysis

Lots of expertise claimed for a degree like this

Analysis reviewed and approved by:

LINGUIST 01
720325

AREAS OF EXPERTISE
Linguistics
Dialectology
Lexicology
Semantics
Computational linguistics

EMPLOYMENT HISTORY
2004 to present -- Linguist at Sprakab

EDUCATIONAL QUALIFICATIONS
Bachelors Degree in Computational Linguistics, Stockholm University, Sweden
Bachelors Degree in Nordic Languages, Stockholm University, Sweden
The Analysis

Analysis

General comments

The person, who is a man, speaks English on the recording. He does not speak English to the level of a mother tongue speaker. He says he comes from Freetown in Sierra Leone. He speaks a variety of English with certainty not found in Sierra Leone. The person speaks a variety of English most likely found in Nigeria or Ghana.

The person says he speaks Krio, however he does not speak any Krio. He also says Krio is the same language as English which is incorrect. Krio is a language which is spoken in Freetown where he says he was born and raised and it is also lingua franca in the country which means it is spoken and understood by the population. He neither speaks any of the other native languages spoken in Sierra Leone. He is asked which language he communicates in with other people, for example, when he shops at the market, he answers English. English is, however, not a common language one speaks in the country. In school English is studied as a subject, which makes the people with a linguistic background in Sierra Leone to speak the language to a grammatically higher level than what the person does.

The person has a great lack of knowledge of Freetown and of Sierra Leone. Several of the things he says are incorrect.
The Analysis

Specific findings:

The IPA system of transcription has been used for transcription of pronunciation and in some cases where a specific character is missing from the Latin alphabet.

Has IPA been used correctly?

Phonological characteristics (including for example pronunciation of sounds and intonation)

The person’s speech has certain phonological features, such as his pronunciation and intonation common in a variety of English spoken in Nigeria. No phonological features can be heard in his speech which occur in a variety of English spoken in Sierra Leone. He says, for example, σIωρθλ→Yνανδ σIωρθλ→Y (= Sierra Leone; compared to “σIερλ→λIεκ→Yν” and “σθθλ→Yν” as it is pronounced in a variety of English respective Krio spoken in Sierra Leone), κριφ→Y (= Krio; compared to “κριυκ→Y” or “κρι:→Yλ”), πειρενσ (= parents; compared to “περρενς”), δαυ νδ (= diamond; compared to “δαIμ→μ→νδ”) and INγρΙΣ (= English; compared to “INγλΙΣ”).

Certain features can be heard in the person’s pronunciation common in a variety of English spoken in Nigeria and Ghana. This can be heard when he uses the aspirated sound [tH] in certain positions where one in Sierra Leone would use the unaspirated /t/. He says, for example, φρι: tHA Yν (= Freetown; compared to “φρι:tAYν” and “φρι:ν” as it is pronounced in a variety of English respective Krio spoken in Sierra Leone) and is (= it is; compared to “it’s”).

It’s all Greek to the Home Office...

Errors in 27 of 52 reports (52%)

That’s not /t/-aspiration – it’s /t/-deletion
The Analysis

Morphology (word structure including suffixes, prefixes, parts of words, inflections)
Syntax (sentence structure including grammatical constructions, word and phrase order)

The person uses morphological and syntactical constructions not typical of a variety English spoken in Sierra Leone. However, his manner of constructing words and sentences are common in a variety of English spoken in Nigeria. He says, for example, *ah fine* = I feel good; in Sierra Leone you would say instead “ah dae do fine’; *the way I sees it* (= the way I see it; compared to “the way I see it” or “to me”) and *it was been founded* (= it was colonized; compared to “it was colonized”). **Zero copula before Adj is actually normal in Krio**

Lexicon and colloquialisms (choice of words and expressions)

The person uses certain words and expressions not typical of a variety of English spoken in Sierra. His choice of words is common in a variety of English spoken in Nigeria. He says, for example, *talk* (= speak; in Sierra Leone you would say “speak”) *education* (= knowledge; compared to “knowledge”) and *been founded* (= was colonized; compared to “colonized”). **Krio proverb “tok af, lef af” is well-known – title of at least 2 published works on Krio**

He does not know of basic words to describe various divisions of the country and its cities. It is something which also persons who lack education know of in Sierra Leone.

Grammar and lexicon “analysis” often simply suggests an alternative way of saying things in the target language, claiming it should have been used by “authentic” speakers.
Improvement in LADO reports

Significant improvements in practice over last 7 years, eg:

- Certainty of assessment is no longer spuriously quantified
- All reports comment on phonology, grammar – not just vocab
- Linguistic features/processes sometimes (correctly) noted
- Claims/efforts to use standard tools & methods such as IPA
- Agency linguists starting to engage in scholarly conferences
- Agency initiatives beginning to collect critical language data
- Linguist/analyst expertise credentials not misleadingly pooled
- **Still not consistently adequate by professional standards**

All improvements **forced by Guidelines & legal challenges**
Joint credentials mislead the Court

ANALYST ea20 and LINGUIST 04

PERSONAL DETAILS
Ea20 was born and raised in Mogadishu in southern Somalia and came to Sweden 1992. The analyst visited Somalia in 1982.

The analyst interprets for the Swedish authorities.

She analyses the Somali language and the Somali dialects Reer-Hamar, Bravanese and May-May.

AREAS OF EXPERTISE
- Linguistics
- Discourse analysis
- Computational linguistics

These areas should be claimed only by Linguist 04, as Analyst ea20 has not got any credentials in linguistics

EMPLOYMENT HISTORY
2007 to present – Analyst in Sprakab
1992 to present – Interpreter in Somali

This history is ea20’s not linguist 04’s

EDUCATIONAL QUALIFICATIONS
Masters Degree in Linguistics, Uppsala University
Academic Studies in Computational Linguistics, Uppsala University
Academic Studies in Psychology, Uppsala University
Academic Studies in Health studies, San Francisco State University
Bachelors Degree in Law, Somalia

Studies by 04...

Studies by ea20

Immigration Judges however often referred to the expert credentials or expertise of the analysts – clearly they were misled by the deceptive manner of mingling them displayed here
#1: LADO by Non-Expert Native Speaker analysts

- Often are NOT native speakers of the varieties they analyze, but of unrelated languages or very different dialects
- Often supervised by linguists w/no expertise in the language
- Does not qualify them to perform complex linguistic analysis
- Or to collect data using scientific methods & research findings
- No guarantee of knowledge of contact processes & effects,
- Or of dialect differences, variation or multilingualism issues
- Not free of language attitudes, prejudices or ideologies
- Not aware of social context, power, ethnic, institutional factors
- Nor of code-switching, borrowing or language choice issues
- **NS ≠ “expertise”** – they fail to satisfy standard legal definitions
Problem #2: The logic of LADO testing hypotheses

- Not addressed directly in 2004 Guidelines, but cf GLs #2 (“Socialization rather than origin”), #4 (“degree of certainty”), #5 (“…useful and reliable data”), #8 (caveat: cross-border varieties)
- Argumentation = heart of linguistic analysis, but not made explicit
- Poor information, folk-linguistic ideology, lack of expertise >>
- …>> poorly formulated testing hypotheses, or none at all >>
- …>> LADO as fishing trip for inconsistency with ‘objective facts’
- …>> logically unsound conclusions based on invalid assumptions
- Also, strategy of reducing sociolinguistic complexity to simplicity:
  - Linguistic repertoire to Native language
  - Complex multilingualism to Monolingualism
Forensic Physical Evidence: Characteristics & Processes

• Objects in evidence = physical structure, defines their identity
  – Presents difficulties for forensic scientists (cf. Inman & Rudin 2002)

• Composition of inert substances (e.g. paper, fibers, bullets) = different order of complexity from biological: fingerprints, DNA

• Former allow classification, ie, matching trace to class of sources
  • Can match torn halves of a piece of paper, but not an intrinsic property
  • Exs. of classification in FL: accent identification (Does recording A show distinctive features of known accent B?), author identification (Do written characteristics of A show distinctive features of known writing pattern X? e.g. as written by non-native, highly educated, etc. person)

• Higher complexity of biological products allows, in principle, matching of a trace to a unique source, i.e. the individualization process...
  – Exs. of individualization in FL: again accent identification (Does recording A match speech samples of individual suspect B?), author identification (Do written characteristics of text A match samples B-X of individual suspect Y?)
Which task-type for LADO?

- Is LADO concerned with classification or individualization?
  - Depends on the nature of language: its structure & characteristics

- 2 conflicting answers by forensic linguists Broeders, Eriksson
  - LADO “is not a form of individualization but essentially a classification process”, aimed at determining “the group of speakers in which [AS] was socialized and learnt to speak his first language” [Broeders 2010: 53]
  - LADO similar to identifying an individual from a voice line-up in that “the task of LADO is individualization, not classification” [Eriksson 2010]

- My own evaluations of LADO reports in the UK process ask:
  - ...whether an applicant's speech patterns show expected features of a specific language variety natively spoken by their claimed group of origin
  - There can be no doubt that this describes a classification task.

- But is this the correct formulation for most or all cases?
#3: LADO testing for NS status

- Speaker’s language competence is in essence changeable, arises via language acquisition & socialization in speech communities...
- ...But changes over lifespan: development, attrition, substitution
  - Caveat: arguments re competence manifested through performance
- Such complexity influences (forensic) linguists to focus/simplify
  - Methods/literature justify doing so in informed, controlled manner
- LADO: links speaker a.f.a.p. with a single native language/L1/MT
- Assumptions relied on by decision-makers to interpret results:
  - Native competence in language X can be sourced to a bounded region
  - Regional identification allows extrapolation to single country of origin
  - National varieties (school, standard, etc.) tend to cohere with borders
  - NS-hood of national variety expected to show origin; otherwise suspicion
  - MT can be displayed on demand regardless of context, directions
From Classification ... 

• **Axiom of the Speech Community:**
  “Speakers who share language socialization are *alike enough* in linguistic production & evaluative norms to be identified as members of the same Speech Community”

• If the “natural unit of sociolinguistic taxonomy... is not the language but the speech community” (Hymes 1972), then...

• SpCom is **locus of socialization** into one’s native language(s), a reference point for individual communicative competence.

• If language is indexical of origins, we reformulate the LADO-Q: “Can analysis reveal whether a speaker is *alike enough* to other SpCom members to be identified as belonging to that group?”
Sample Hypotheses

• Possible hypotheses of classification, e.g.:
  – Does AS speech in LADO interview belong to language variety X?
  – Does AS speech exhibit expected/stereotyped characteristics of X?
  – Does AS speak language variety X with native competence?
  – Does AS’s speech in language variety X show any complicating features (attributable to e.g. L1 transfer, variation, attrition or contact effects)?

• Broeders (2010) also argues that the logical conclusion format of most LADO reports is incorrect and recommends assessing the probability of two specific, competing hypotheses, including e.g.:
  – Is AS a Native Speaker of Y pretending to be a Native Speaker of X?

• Note criteria for language impersonation must also be specific
...to Individualization

- Speech Community is also a “product of the communicative activities engaged in by a given group of people” (Duranti 1997).
- So Speech Community is the locus for the initial development of multilingualism & speaker’s individual linguistic repertoire.
- Rephrasing the basic sociolinguistic question for LADO, again:
  – “How does an applicant’s linguistic performance in a LADO context correlate with their individual history of speech community membership, language socialization & contact?”
- This allows us to invoke the **Axiom of the Idiolect**: “No two speakers are completely alike in linguistic production”
- …and investigate LADO hypotheses of individualization.
Simplify or Complicate?

• If focus on Native Speaker is legitimate, then stable structure/composition can be assigned to a critical component of a speaker’s language competence – one acquired in childhood and fixed at end of Critical Period of biological development.

• Logic: The earlier acquisition ends, the more the homogeneity b/w a speaker’s birthplace & their native language competence,

• >> ...allows simpler LADO task of classification...

• BUT:

• Contact: no principled limit to number of languages or variety of contact effects an individual may experience in a lifetime.

• Analogy of biological complexity (e.g. DNA & fingerprints) to inherent variation: though part of system, possibility to exploit variation to express individual identity is limitless. Even w/o acts of identity, multilingualism, etc., the range of monolingual choices + voice setting/quality etc. >> individualization.
#4: Complex linguistic biographies

- **Individualization is sometimes the logical LADO hypothesis**
- Examination of speaker’s **linguistic history and repertoire** often produces unique trajectory to be matched w/complex speech
- Classic ex: ‘Joseph’ in Blommaert (2009), a Rwandan refugee w/complex multilingual history of displacement & linguistic choice & identification including c.8 languages by age 15:
  - English, French, Swahili, Kinyarwanda, Kinyankole, Runyankole, etc.
- Instead of linguistically naive, institutionally-endorsed “National Order” model of language competence, Blommaert argues for
  - dynamic model capable of encompassing a unique linguistic biography
  - & of paying special attention to “sociolinguistic repertoires that index full histories of people & places, not just institutionally genred origins”
- a **“Sociolinguistics of speech & repertoires”, not of languages**
Complex linguistic biographies

- Does justice to the multilingual reality of speech communities, and to complex life-stories of displacement that are typical of ASs
- Preferable to monolingual NS stereotype of decision-makers
- Possibility of falsification of such speech complexity arguably is lower than for impersonation of a single native variety
- Requires longer, more detailed analysis process: needed anyhow
- Requires changes in government LADO commissioning regime

- Courts need testable, objective evidence to give reliable results
- Where AS’s trajectory is too complex for such an approach, linguists should advise courts against employing LADO analysis
- Not always the right way—some cases match the stable-SpCom model better—empirically-based decision criteria are needed
A Wish-list for LADO, I: Focus on government procedure

Initiative lies with: G= Government, F= Firm, E= External expert(s)

- Strength/immaturity of LADO to originate from several sources?
- Weakness in isolated developments: Firms restricted by profit motive/competition, Govts. by domestic policy/public pressure
- External sources evolving: Guidelines, LARG, EU LADO bureau? but still lack of widely-accepted independent criteria, except GLs
- **G:** Open tender process > competition > higher quality/cost
- **G/F:** Process to systematically consider Linguistic Repertoire as well as/instead of focusing analysis on Native Language(s)
- **E/F/G:** Process justifies focus on LR vs. NL by type of case
- **G/F/E:** Routine detailed assessment of Asylum Seeker’s linguistic history (trained personnel) before commissioning LADO
A Wish-list for LADO, II: Focus on training & review

- **E:** External criteria for analyst training subscribed to by govt, eg.
  - Equivalent MA coursework in core areas of linguistic description
  - Ditto: language contact, sociolinguistics, dialectology of relevant language(s) + training in forensic context of asylum process

- **G:** Evidence required at time of tender for concerned languages

- **G/E:** Evidence/data available for public independent review

- **E:** Creation of secure archive of data/evidence for study

- **F/G:** Firms/bureaus identify linguists/analysts in reports

- **F/G:** Public detailed description of linguist/analyst training regime

- **F/G:** Ditto for periodic assessment/testing regime of analysts
A Wish-list for LADO, III: Focus on data & analysis

• E/F/G: Longer interviews employ appropriate methods for goal
• F/G: Reports give more data, analysis accountable to all the data
• F/G: Reports systematically set out anticipated linguistic features, supply rationale for them, compare to those found (no fishing!)
• F/G: Reports systematically consider Linguistic Repertoire as well as/instead of focusing analysis on Native Language(s), with due awareness of multi-/pluri-lingualism & contact phenomena
• F/G: Reports cite appropriate literature, use it in argumentation
• F/G/E: Agency research made public in peer-reviewed outlets
• F/G: Reports contain explicit argumentation to professional std.

• Me: Also an I-phone and World Peace... Thank you, Santa!
Joint credentials mislead the Court

**ANALYST ea20 and LINGUIST 04**

**PERSONAL DETAILS**

Ea20 was born and raised in Mogadishu in southern Somalia and came to Sweden 1992. The analyst visited Somalia in 1982.

The analyst interprets for the Swedish authorities.

She analyses the Somali language and the Somali dialects Reer-Hamar, Bravanese and May-May.

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1992 to present – Interpreter in Somali

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**EDUCATIONAL QUALIFICATIONS**

Masters Degree in Linguistics, Uppsala University

Academic Studies in Computational Linguistics, Uppsala University

Academic Studies in Psychology, Uppsala University

Academic Studies in Health studies, San Francisco State University

Bachelors Degree in Law, Somalia

Studies by 04…

…Studies by ea20

Immigration Judges however often referred to the expert credentials or expertise of the analysts – clearly they were misled by the deceptive manner of mingling them displayed here.
## Endorsements of 2004 Guidelines for the use of language analysis

- **AAAL** – American Association for Applied Linguistics
- **AIDA** – Association Internationale de Dialectologie Arabe
- **ALAA** – Applied Linguistics Association of Australia
- **ALS** – Australian Linguistic Society
- **ANELA** – Netherlands Association for Applied Linguistics
- **AVT** – Netherlands Society for General Linguistics
- **BAAL** – British Association for Applied Linguistics
- **IAFL** – International Association of Forensic Linguists
- **LAGB** – Linguistic Association of Great Britain
- **LSA** – Linguistic Society of America
- **SPCL** – Society for Pidgin and Creole Linguistics
Case Results, Oct ‘08-May ‘11

• Evaluation of Prof. PL Patrick’s reports in UKAIT appeals in which Sprakab reports were part of the basis of the initial denial of asylum. As of 1 June 2011, I have supplied expert reports in 53 cases (44 of them Somali) which contest the basis of Sprakab language analysis reports. I have been able to obtain results (judgments, determinations or reports of hearings) in approx. half of these cases.

• The 25 cases, heard by UKAIT between Oct 2008 and May 2011, for which I have been able to obtain results show this distribution of results:
  • 18 of 25 cases Appeal allowed, in accord with Patrick’s report
  • 3 of 25 cases Appeal denied clan/language claim accepted; little/no weight on Sprakab report, and/or (more) weight placed on Patrick report.
  • 2 of 25 cases Appeal denied, little/no weight on either Sprak or Patrick reports
  • 2 of 25 cases Not determined on language grounds; no judgment of reports

• Other cases heard by UKAIT between Oct 2008 and May 2011 are either still in progress, or may have been resolved but I have not been able to obtain copies of or information on the decisions.

• The 25 cases for which results have been obtained are detailed below. All quotations are taken from the Immigration Judge’s official determination.
- Oct 08: appeal allowed – no determination
- Feb 09: appeal allowed – no determination
- Mar 09: appeal allowed, cites PLP, “Sprakab report must be rejected”
- Apr 09: appeal allowed – no determination
- Jun 09: appeal allowed – no determination
- Jun 09: appeal dismissed; accepts clan claim; Sprakab report fails to meet high standard
- Sep 09: appeal allowed, IJ did not accept Sprakab’s conclusion
- Dec 09: appeal allowed. PLP report “highly reliable... I accept his opinion”
- Dec 09: refugee status granted – no determination
- Neu Jan 10: appeal denied, in prog. Neither PP nor Spr report relied on by IJ
- Jan 10: appeal allowed. PLP report accepted in full, no weight on Sprakab
- Feb 10: appeal denied, in progress. Sprakab report given “limited weight”
• + Feb 10 appeal allowed. Little weight on Sprakab report, more to PLP
• Neu Mar 10 appeal denied, not on language. No weight on Sprakab report
• + Mar 10 appeal allowed. “Sprakab report is deeply suspect”
• + Mar 10 appeal allowed. Little weight on Sprakab report, more to PLP
• + Mar 10 appeal denied, in progress. Clan/language claim accepted, Sprak report “flawed”.
• X Mar 10 appeal denied; appeal in progress, based in part on no mention of PLP report.
• + May 10 appeal allowed. Weight on PLP report, clan claim accepted. "linguistic analysis carried out by Sprakab is flawed"
• + May 10 appeal denied, in progress. Sprak “linguistic account” found to be “flawed”
• + Jun 10 appeal allowed, language/clan claims accepted
• + Jul 10 appeal allowed, places weight on PLP report
• + Jul 10 appeal allowed, rejects Sprakab conclusions
• + May 11 appeal allowed, language/clan claims accepted. Weight placed on PLP specific criticisms (not on general ones, due to RB). Sprakab analysis found "extremely vague and unsubstantiated".