

1 Wednesday, 5 April 2017
 2 (10.33 am)
 3 THE CHAIRMAN: Yes, Mr Beer.
 4 MR BEER: Sir, Mr Davies is not in court but he has said
 5 that it is okay to proceed without him.
 6 THE CHAIRMAN: Certainly. Thank you.
 7 W9 (continued)
 8 Questions from MR BEER (continued)
 9 MR BEER: W9, I asked you yesterday about your training and
 10 background.
 11 **A. Yes.**
 12 Q. We were about to turn, I think, to the question of your
 13 previous knowledge before Operation Shire, if any, of
 14 the subjects.
 15 Before Operation Shire began, had you any previous
 16 knowledge or been involved in any operations concerning
 17 Anthony Grainger?
 18 **A. Yes, I had.**
 19 Q. And when was that?
 20 **A. I can't recall exactly but he had featured on a firearms**
 21 **briefing previously, yes.**
 22 Q. Can you remember in what context he had featured?
 23 **A. I think a similar role to what he was in on this, as**
 24 **a driver of a team of armed robbers.**
 25 Q. When was that?

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1 **A. I couldn't tell. Prior to 2012.**
 2 Q. What role had you performed?
 3 **A. For that specific operation?**
 4 Q. Yes.
 5 **A. I would just be part of the MASTS team.**
 6 Q. Did it result in a deployment?
 7 **A. It'll -- I think, if I recall, it would have been**
 8 **a briefing because that is how I would have known his**
 9 **face but as to say whether we conducted any, you know,**
 10 **interception, I couldn't say.**
 11 Q. You said you would have known his face. Does that mean
 12 that when you were briefed on 3 March you recognised his
 13 face?
 14 **A. That's correct, sir.**
 15 Q. You did?
 16 **A. Yes, from a previous operation.**
 17 Q. You have no idea how long before this was?
 18 **A. I couldn't tell, no.**
 19 Q. Can you remember anything more about the previous
 20 briefing?
 21 **A. No, I couldn't. We get it quite a lot, you get the same**
 22 **faces appearing on briefings over different years.**
 23 Q. How do you treat that as an experienced firearms
 24 officer, where you have been briefed about a subject
 25 months, years, maybe even a decade earlier, and then you

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1 are briefed again about them?
 2 **A. You take it on whatever information you get at the time**
 3 **at that briefing, you know.**
 4 Q. Is that for the reason that those that are in charge of
 5 the firearms deployment that you are currently engaged
 6 in, you assume that they will put before you the current
 7 and reliable intelligence picture?
 8 **A. Yes, there will have been the meetings and risk**
 9 **assessment meeting, working strategy and all of that**
 10 **will have been gone through before it comes through**
 11 **to -- for us to get involved into.**
 12 Q. Do you work on, and only on, the basis of what you are
 13 briefed up on that occasion?
 14 **A. You might have it in mind, like, "I recognise the face",**
 15 **you know, but other than that, yes, on what you are**
 16 **briefed on the occasion.**
 17 Q. What might you have in mind?
 18 **A. That he has featured on a previous operation.**
 19 Q. What impact would that have on you, if any?
 20 **A. Just that it is a known face to myself, that is it.**
 21 Q. What impact other than, "That is a face I recognise",
 22 might that have? None in particular?
 23 **A. None in particular. I will go on what information I am**
 24 **given at the briefing.**
 25 Q. What I am getting at is you don't think:

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1 "Well, hold on I have been briefed up about this
 2 suspected armed robber before and here he is again, I am
 3 being briefed up about him being a suspected armed
 4 robber on this occasion. There is some corroboration to
 5 the intelligence I am currently being given."
 6 **A. Yes, but there might -- previous couple of years they**
 7 **might just have been doing recces, they might have --**
 8 **you know, I don't know what the intelligence was to**
 9 **previous operations, but, you know, you just take it on**
 10 **face value of what I am getting there.**
 11 Q. The long and the short of it is that you work on the
 12 basis of what you are told on the day?
 13 **A. Yes.**
 14 Q. Yes?
 15 **A. Yes.**
 16 Q. The same question in relation to Mr Rimmer, had you been
 17 involved in any operations involving him?
 18 **A. I didn't recognise him, sir, no.**
 19 Q. The same question in relation to Mr Totton.
 20 **A. I had heard of Mr Totton before and I think he might**
 21 **have featured on a briefing previously.**
 22 Q. Would you approach that in the same way as you have just
 23 described as in relation to Mr Grainger?
 24 **A. Mr Totton was a lot more well known than Mr Grainger.**
 25 Q. Would you approach your previous knowledge of Mr Totton

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1 differently then?
 2 **A. It would be what -- no. Just that I knew he was more**
 3 **active than Mr Grainger. You know, I know that he had**
 4 **had an attempt on his life and, you know, main player in**
 5 **an OCG.**
 6 Q. Would you have approached him differently then?
 7 **A. Well, he would have had more kudos in the criminal**
 8 **fraternity, Mr Totton was a big name to me.**
 9 Q. I am not asking you about what the position was, I am
 10 asking what effect on your mind your previous knowledge
 11 of your describing --
 12 **A. Well he is just someone that has featured on a briefing**
 13 **beforehand and I would take whatever I would get on this**
 14 **operation.**
 15 Q. Right, so is that the overriding message we should take
 16 from this: you work on the basis of what you are told on
 17 the day?
 18 **A. Yes.**
 19 Q. Yes, okay.
 20 When was your first awareness of or involvement in
 21 Operation Shire?
 22 **A. I think, from my recollection, it is five years ago,**
 23 **December time.**
 24 Q. According to the records that we now have, you attended,
 25 first, on 15 December 2011 a briefing, yes?

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1 **A. Yes.**
 2 Q. Then again on 2 March --
 3 **A. Yes.**
 4 Q. -- and then again on 3 March --
 5 **A. That's correct.**
 6 Q. -- does that sound accurate?
 7 **A. Yes.**
 8 Q. Again, was that a usual feature of firearms operations
 9 within GMP? That in a long-running operation you may be
 10 deployed more than once?
 11 **A. Yes. You could be deployed on the operation and then**
 12 **that operation, you could not be deployed on it for**
 13 **weeks --**
 14 Q. A bit like this one?
 15 **A. Yes, and then redeployed again. It depends what the,**
 16 **you know, information and intelligence if nothing has**
 17 **happened they might say, right, we will do some more**
 18 **lifestyle, you know, get some more information. It all**
 19 **depends what information and intelligence and how they**
 20 **are getting that.**
 21 Q. Again, do you adopt the same approach as you have
 22 described to us earlier, that you work on the basis of
 23 the information that you are given on the briefing on
 24 the day for that day's deployment?
 25 **A. Yes, you are aware, you know, of previous briefings,**

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1 **yes, but it is whatever information you are given on**
 2 **that day.**
 3 Q. Is that because in the course of an operation the
 4 intelligence picture may change?
 5 **A. Yes, and it would be getting updated all the time.**
 6 Q. Information that was previously thought to be reliable
 7 may subsequently turn out to be unreliable?
 8 **A. Yes, depending on where they are getting the information**
 9 **from, yes.**
 10 Q. Conversely, the other way round, information that was
 11 previously thought to be unreliable may be later on
 12 judged to be more reliable?
 13 **A. That's correct, yes.**
 14 Q. So because the intelligence picture changes over the
 15 course of an operation, you wouldn't particularly want
 16 to rely on something that you had been told about weeks
 17 or months earlier on the day?
 18 **A. No. You might have it in your mind but no, you would**
 19 **rely on that briefing on the day.**
 20 Q. In firearms briefings generally, I am not talking about
 21 Operation Shire here, was it usual to be given
 22 an assessment of the reliability of intelligence?
 23 **A. Different TFCs that were at the briefing would present**
 24 **it in different ways, like they might say, "We have got**
 25 **some B12 rated intelligence", depending what they had**

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1 **got off the investigation team, others might just say,**
 2 **you know, "He has previously been arrested", you know,**
 3 **for a certain thing.**
 4 Q. With some TFCs they would give you the proper grading by
 5 reference to the National Intelligence Model 5x5x5
 6 system, the B25 or whatever?
 7 **A. Yes, that's correct, sir. Some would want more meat on**
 8 **the bones, like if it just says he has been arrested for**
 9 **assaulting someone, well what did he assault them with?**
 10 **You know, how long ago was it? Was it when he was**
 11 **a juvenile? All stuff like that would be current, so**
 12 **some TFCs would ask more questions.**
 13 Q. You are talking about TFC asking more questions there,
 14 is that in the context of a risk assessment meeting?
 15 **A. Yes, I mean sometimes as members of the planning team**
 16 **you might have to go to one of these meetings with a TAC**
 17 **adviser, TFC would be there and one of the sponsors and**
 18 **you might be tasked with putting a plan together.**
 19 Q. Okay, so the practice in GMP varied from TFC to TFC?
 20 **A. Yes.**
 21 Q. Yes?
 22 **A. Yes.**
 23 Q. It was a matter of sort of personal choice or
 24 preference?
 25 **A. Yes.**

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1 Q. Okay.

2 Then what about the briefing itself, not if you had

3 been let into the planning meeting, if you were just the

4 AFO that had been asked to come on duty at 4.30 in the

5 morning or whatever and you attended the briefing. In

6 the course of those briefings, again did practice vary

7 it was to whether or not in the briefing some assessment

8 of the reliability of the intelligence was given?

9 **A. Well, from previous experience, before us going into the**

10 **briefing, you know, when we get our equipment ready, our**

11 **weapons, the TFC would meet with the OFC and they would**

12 **go through the briefing together prior to us, it being**

13 **delivered to ourselves.**

14 **So you would take what you were being told, you**

15 **know, as correct.**

16 Q. In the course of the briefing, assume you were not part

17 of the TFC to OFC conversation.

18 **A. Yes.**

19 Q. You are sitting in the briefing, there is a PowerPoint

20 up on the wall or the screen, yes?

21 **A. Yes.**

22 Q. And somebody is speaking to it, the TFC and then the OFC

23 usually, yes?

24 **A. Yes. Yes.**

25 Q. In the course of such a briefing, was it usual for

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1 an assessment of the reliability of the intelligence to

2 be given?

3 **A. Can you just repeat the question?**

4 Q. Yes. You are sitting in a briefing --

5 **A. Yes.**

6 Q. -- there is a PowerPoint up on the wall --

7 **A. Yes.**

8 Q. -- somebody is talking about it --

9 **A. Yes.**

10 Q. -- it is about the intelligence --

11 **A. Yes.**

12 Q. -- that you are going do work on that day --

13 **A. Yes.**

14 Q. -- did they normally give you an assessment of the

15 reliability of that intelligence?

16 **A. Yes.**

17 Q. They did?

18 **A. Yes.**

19 Q. How did they do that? Did they use the National

20 Intelligence Model 5x5x5, or did they use words like

21 "reliable intelligence", "good intelligence"?

22 **A. It would vary from TFC to TFC, like I say. Some would**

23 **go into more details and others would just, you know,**

24 **say what was on the briefing.**

25 Q. Okay.

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1 So for some TFCs they would use the 5x5 system?

2 **A. Yes, that's correct.**

3 Q. For some of them, they would use words?

4 **A. Yes.**

5 Q. "Good intelligence", "reliable intelligence", yes,

6 "sourced intelligence" or whatever?

7 **A. Yes, that's correct.**

8 Q. Would some of them not do that at all, either of those

9 two things?

10 **A. They would just read what would be on the briefing or**

11 **they would ask whoever has put the briefing together to**

12 **put some more detail on it.**

13 Q. Let's just take an example. If you pull out the general

14 bundle, number 2, we are going to come back to this

15 later in the day.

16 **A. Is that file 2?**

17 Q. Yes, it is.

18 If you open up tab 22, which is the briefing for

19 3 March.

20 **A. Yes.**

21 Q. Yes?

22 If you turn to page 1268, yes?

23 **A. Yes.**

24 Q. Can you see under Mr Totton's capability, it says,

25 "Warnings, firearms-possession of a shotgun in 1999"?

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1 **A. Yes.**

2 Q. Yes?

3 **A. Yes.**

4 Q. How would you treat that --

5 **A. Err.**

6 Q. Let me just ask the question fully, first.

7 Would you treat that as meaning, "There is some

8 intelligence that in 1999 he possessed a shotgun".

9 Would you treat it as there is good intelligence,

10 reliable intelligence, he had been convicted of that

11 offence? Would you treat it as established fact, how

12 would you treat it?

13 **A. I would just treat that as it is on here, firearms,**

14 **possession of shotgun in 1999, he has either been**

15 **arrested or convicted of possession of that firearm.**

16 Q. There is a bit of a difference, isn't there?

17 **A. Yes.**

18 Q. You said that some TFCs would use the 5x5 system --

19 **A. Yes.**

20 Q. -- which is known to all police officers, yes?

21 **A. Well they have an understanding of it, yes.**

22 Q. Yes, well the idea of it is that there is a common

23 understanding, so that if an officer says, "This is B25

24 intelligence", something will click?

25 **A. Yes.**

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<p>1 Q. And I know what that means?</p> <p>2 A. Yes.</p> <p>3 Q. Yes?</p> <p>4 Or you could say, "There is reliable intelligence</p> <p>5 that in 1999 Mr Totton was found in possession of</p> <p>6 a shotgun", yes?</p> <p>7 A. Yes.</p> <p>8 Q. This doesn't say any of those things, all it says is:</p> <p>9 "Firearms-possession of shotgun in 1999."</p> <p>10 What do you walk away from such a briefing thinking?</p> <p>11 A. Just that he has either been convicted or arrested for</p> <p>12 possession of a shotgun in 1999.</p> <p>13 I have been on briefings where you can just have</p> <p>14 warning "FI".</p> <p>15 Q. It just says "firearms"?</p> <p>16 A. It just says "firearms", it won't say anything, but with</p> <p>17 this it has a list of possession of a shotgun in 1999.</p> <p>18 To me he has either been convicted of it or been</p> <p>19 arrested for it.</p> <p>20 Q. I think from your answers already, W9, you appreciated</p> <p>21 or you have said you appreciated there is a bit of</p> <p>22 a difference.</p> <p>23 A. Yes, sir.</p> <p>24 Q. But you are not being told what that difference was?</p> <p>25 A. On certain briefings you wouldn't, no.</p> <p style="text-align: center;">Page 13</p>	<p>1 day, but there were some differences between what was</p> <p>2 said on each day. I just want to go through those and</p> <p>3 see whether they were things that you noticed at all.</p> <p>4 If we look, please, at page 1179 in tab 21. Can you see</p> <p>5 that?</p> <p>6 A. Yes, 1179.</p> <p>7 Q. Can you see the large box on 1179?</p> <p>8 A. Yes.</p> <p>9 Q. In the second paragraph on the large box, the one</p> <p>10 beginning, "Okay I am going to go into the roles ..."</p> <p>11 About ten lines in, I think it is X7 speaking, he says:</p> <p>12 "The reason we are at Leigh police station is</p> <p>13 obviously to intercept the subjects prior to them</p> <p>14 getting to Culcheth."</p> <p>15 A. Yes.</p> <p>16 Q. Can you see that line?</p> <p>17 A. Yes.</p> <p>18 Q. Then if you go over the page to 1180, again in the</p> <p>19 second paragraph, in the big box, X7 says:</p> <p>20 "While we are on the subjects, our intention is to</p> <p>21 conduct an interception prior to any offences taking</p> <p>22 place which is before we get to Culcheth."</p> <p>23 Yes, do you have that?</p> <p>24 A. I am just trying to find that.</p> <p>25 Q. The second paragraph on 1180:</p> <p style="text-align: center;">Page 15</p>
<p>1 Q. Thank you. We can put file 2 away.</p> <p>2 Do you recall now, five years on, attending the</p> <p>3 briefing on 2 March?</p> <p>4 A. I recall attending briefings for Operation Shire, yes.</p> <p>5 Q. Can you now recall any differences between the briefing</p> <p>6 on 2 March to that on 3 March?</p> <p>7 A. Not off the top of my head, no. Not five years on.</p> <p>8 Q. Okay.</p> <p>9 Can we look, please -- having said put the file</p> <p>10 away, let's take it out again in a different tab.</p> <p>11 Tab 20, please. This is the briefing for 2 March.</p> <p>12 A. Yes.</p> <p>13 Q. I think we see you on the second page, page 448, W9 as</p> <p>14 "due to be present".</p> <p>15 A. Yes, that's correct, sir.</p> <p>16 Q. Then if we look at tab 21, which is a transcript of the</p> <p>17 recording of the briefing --</p> <p>18 A. Yes.</p> <p>19 Q. -- we can see that in the roll call that was conducted</p> <p>20 you called your name out.</p> <p>21 A. Yes, that's correct.</p> <p>22 Q. Yes?</p> <p>23 A. Yes.</p> <p>24 Q. So you were indeed present.</p> <p>25 The substance of the PowerPoint was the same on each</p> <p style="text-align: center;">Page 14</p>	<p>1 "While we are on the subjects, our intention is to</p> <p>2 conduct an interception prior to any offences taking</p> <p>3 place which is before we get to Culcheth."</p> <p>4 THE CHAIRMAN: It is at the start of that paragraph. Do you</p> <p>5 have it?</p> <p>6 A. Ah yes. Yes.</p> <p>7 MR BEER: It begins with the word "Erm", yes?</p> <p>8 A. Yes.</p> <p>9 Q. Do you now remember him saying that?</p> <p>10 A. I can't recall that, no.</p> <p>11 Q. Presumably, reading these words now, him saying it</p> <p>12 twice, you would understand the plan to be to prevent</p> <p>13 the vehicle from arriving in Culcheth?</p> <p>14 A. That's correct, yes.</p> <p>15 Q. This would involve, if the subjects had left in the</p> <p>16 vehicle from Boothtown, a vehicle stop en route?</p> <p>17 A. Yes, that's correct.</p> <p>18 Q. When it came to the briefing the next day, 3 March, we</p> <p>19 will see that X7 and Superintendent Granby neither of</p> <p>20 them said the same thing.</p> <p>21 A. Right.</p> <p>22 Q. There was no plan, at least announced, to stop the</p> <p>23 vehicle en route to Culcheth, yes?</p> <p>24 A. Yes.</p> <p>25 Q. Did you, notwithstanding that, understand the tactic to</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

<p>1 be the same?</p> <p>2 A. With the different intelligence and information that</p> <p>3 comes in, you know, the TFC might change from one</p> <p>4 briefing to another of how he wants to implement, you</p> <p>5 know, course of action. It might be in conjunction with</p> <p>6 an SIO, something might have changed in the meantime.</p> <p>7 Q. Putting it another way, what did you understand on</p> <p>8 3 March the tactical plan to be?</p> <p>9 A. Whatever was in the briefing that was related to me.</p> <p>10 Q. The briefing is expressed at a very high level of</p> <p>11 generality. In fact both of the briefings are expressed</p> <p>12 at a very high level of generality in terms of --</p> <p>13 A. It was prior to them committing any offence.</p> <p>14 Q. Yes. I mean the strategy on both days was to minimise</p> <p>15 the risk to the public:</p> <p>16 "To minimise the risk to the public in Greater</p> <p>17 Manchester and adjoining force areas, to maximise the</p> <p>18 safety of untasked officers, to maximise the safety of</p> <p>19 tasked officers, to minimise the risk to the subjects."</p> <p>20 So quite high level statements of purpose?</p> <p>21 A. Everything we do in firearms we try to minimise the risk</p> <p>22 and maximise the safety.</p> <p>23 Q. I understand that.</p> <p>24 What I am asking is that on this day, 2 March, there</p> <p>25 was a more detailed statement of intent of how you were</p> <p style="text-align: center;">Page 17</p>	<p>1 Can you see that?</p> <p>2 A. Yes. Yes.</p> <p>3 Q. Firstly, can you understand what Mr X7 is saying there?</p> <p>4 A. If we have not had time to take an intervention and then</p> <p>5 it looks like we are conducting a foot strike.</p> <p>6 Q. Why would that be the safest option? So if they get on</p> <p>7 to the plot, I think what he is saying is that we don't</p> <p>8 strike on the vehicle, we let them get out. Is that</p> <p>9 right?</p> <p>10 A. "It may be appropriate that ..." (Pause)</p> <p>11 It is just the way I am reading it there is if they</p> <p>12 get due to the layout of the road, they get there before</p> <p>13 we can put a strike in --</p> <p>14 Q. Yes, exactly, so if the car arrives in Culcheth.</p> <p>15 A. Yes, "We get close to them we will deploy. As it</p> <p>16 stands ..." (Pause)</p> <p>17 Yes, as they are getting out of the vehicle, conduct</p> <p>18 a strike there, yes.</p> <p>19 Q. Why would that be the safest option? To let them get</p> <p>20 out of the car and conduct a foot strike on them?</p> <p>21 A. Ideally -- I couldn't tell you.</p> <p>22 Q. As an officer of many years' experience, as you outlined</p> <p>23 to us yesterday, would it be the safest option if you</p> <p>24 couldn't stop the car from getting to Culcheth, if the</p> <p>25 car arrived on the plot in Culcheth --</p> <p style="text-align: center;">Page 19</p>
<p>1 going to achieve those aims.</p> <p>2 A. Yes.</p> <p>3 Q. We stop the vehicle ever arriving in Culcheth, yes?</p> <p>4 A. Yes.</p> <p>5 Q. Was there any discussion that you now recall the</p> <p>6 following day, "We are going to let the vehicle arrive</p> <p>7 in Culcheth"?</p> <p>8 A. None that I was party to but, like I say, if the</p> <p>9 intelligence or information had changed I might not be</p> <p>10 privy to that.</p> <p>11 Q. The second thing I wanted to ask you about is if you go</p> <p>12 over the page to 1181.</p> <p>13 A. On --</p> <p>14 Q. 1181, sorry, we are back in tab 21.</p> <p>15 Do you have 1181?</p> <p>16 A. Yes.</p> <p>17 Q. This is again I think X7 speaking, and in the first</p> <p>18 paragraph, under "Erm contingencies ..." The last five</p> <p>19 lines of that, can you see he says:</p> <p>20 "It may be appropriate that they are getting on to</p> <p>21 the plot. So if that is the case and we can't get close</p> <p>22 to them, we will let them deploy. As it stands, there</p> <p>23 is no threat to any individuals as we are aware. So</p> <p>24 will be the safest option is to let them deploy on foot</p> <p>25 and we conduct any strike there."</p> <p style="text-align: center;">Page 18</p>	<p>1 A. Yes.</p> <p>2 Q. -- would it be the safest option to let the subjects get</p> <p>3 out of the car and conduct a foot strike?</p> <p>4 A. My personal, you know, from experience, I would like</p> <p>5 them contained in the vehicle.</p> <p>6 Q. You would disagree that the safest option is to let them</p> <p>7 deploy on foot?</p> <p>8 A. My personal view, yes, I would.</p> <p>9 Q. Why is that?</p> <p>10 A. Because they are contained in a vehicle, less chance of</p> <p>11 them running off, members of the public getting in the</p> <p>12 middle of a strike and, you know, more dangers to</p> <p>13 members of the public.</p> <p>14 Q. Presumably, if you heard this, you don't remember this</p> <p>15 now?</p> <p>16 A. No, I don't remember it, no.</p> <p>17 Q. But if somebody, if X7 was standing here today and he</p> <p>18 said this, you would say, "Hold on, boss, that's not</p> <p>19 right"?</p> <p>20 A. Yes.</p> <p>21 Q. Wouldn't you?</p> <p>22 A. Yes.</p> <p>23 Q. Well, at the end of the briefing, X7 gave that</p> <p>24 opportunity, he said, "Any questions, any points anyone</p> <p>25 wants to raise?"</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

1 **A. Yes, I mean it has took me a couple of times, hasn't it,**
 2 **to look through and read it as it is there. So I can**
 3 **only say I might have missed it on the briefing.**
 4 Q. Do you think he might have been saying that, looking at
 5 it from the other perspective, the safest option is that
 6 if the car arrives, for example, in a car park, as
 7 indeed it did, that it may be quite hard to conduct
 8 a strike on a parked car in a car park?
 9 **A. As other people have said, we have like conventional or**
 10 **unconventional and we class that as an unconventional,**
 11 **it being in a car park. But if the car park is empty**
 12 **and there is no one about, you know, there are gaps**
 13 **either side, then it would be, you know, a preferred**
 14 **option than doing it in the village.**
 15 Q. You said in the course of that answer, "As other people
 16 have said ..." Is that --
 17 **A. From reading some of the transcripts that --**
 18 Q. You have been reading the transcripts of other people's
 19 evidence?
 20 **A. Yes, sir.**
 21 Q. You said also in the course of that answer that there
 22 are conventional and unconventional strikes?
 23 **A. Yes, sir.**
 24 Q. Amongst the conventional are near and offside strikes on
 25 a vehicle that is on a road --

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1 **A. Yes.**
 2 Q. -- either moving or stationary, but still on a public
 3 road?
 4 **A. Yes.**
 5 Q. Yes?
 6 **A. Yes.**
 7 Q. Amongst unconventional strikes are those on a car that
 8 is parked up in a car park?
 9 **A. Yes.**
 10 Q. Yes.
 11 Why is it unconventional?
 12 **A. Because we try to get vehicles at natural stops, where**
 13 **they come to a natural stop, whether it be a roundabout,**
 14 **traffic lights. Car parks can be unpredictable,**
 15 **depending on the time of day, location, you know, and**
 16 **getting the vehicles to block it in, size of the car**
 17 **park.**
 18 Q. Was it regarded as the least preferred option --
 19 **A. I wouldn't say --**
 20 Q. -- and unconventional for that reason?
 21 **A. We got -- when we got trained it was known as**
 22 **an unconventional one. Sometimes it would be safer to**
 23 **conduct -- if you had to do a strike, conduct it in**
 24 **a car park.**
 25 Q. Why was it known as unconventional?

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1 **A. Because the majority of the ones we did conduct were on**
 2 **the road.**
 3 Q. But why?
 4 **A. Just how it was taught, whether it was how it was**
 5 **formulated in the training manual or ...**
 6 Q. How frequently did you practise unconventional strikes?
 7 **A. Did them on refresher training and if we had certain**
 8 **information we would practise them after briefings. It**
 9 **wasn't always the case, normally at the start of**
 10 **an operation we would do it but, you know, some TFCs**
 11 **would want to see it if, you know, they hadn't seen us**
 12 **train for a while or they were not aware of a change in**
 13 **the tactic. They would want to come and watch us do it**
 14 **in the car park prior to deploying.**
 15 Q. You are talking about two different things there.
 16 One is as part of the cyclical training process,
 17 yes?
 18 **A. Yes, cycle training, yes.**
 19 Q. Then the other is on a deployment, having been briefed
 20 up on the day, you would do a rehearsal?
 21 **A. Sometimes, yes.**
 22 Q. Would that be at Openshaw, generally?
 23 **A. Generally, yes.**
 24 Q. Is that because of the space and the privacy?
 25 **A. Yes, because it is a secure location and, plus, it is**

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1 **before we have loaded up our weapons and actually gone**
 2 **out on the job, so, you know, we are going out with the**
 3 **weaponry that we are doing but it has just been cleared**
 4 **and checked and safe for use.**
 5 Q. On such rehearsals, were they conducted effectively slow
 6 time so that you would walk through the steps involved?
 7 **A. They could start off slow time, yes and then you would**
 8 **speed it up.**
 9 Q. Would they be observed by the OFC and TFC?
 10 **A. Yes.**
 11 Q. And maybe the TAC adviser?
 12 **A. Yes.**
 13 Q. And potentially firearms instructors?
 14 **A. Yes, we would have had firearms instructors, sorry,**
 15 **within the teams as well so it could be one that is not**
 16 **actually on the job or one that is actually on the**
 17 **deployment.**
 18 Q. I see. By a combination of those means would issues be
 19 raised and discussed about things that were going to be
 20 problematic and things that would go well?
 21 **A. Yes, it varied from different jobs, because at certain**
 22 **deployments you could go on the subjects could be using**
 23 **a van, so we would try and get a like van to say,**
 24 **"Right, this one has a side door and a back door", you**
 25 **know, rather than being too heavy on one side of the**

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1 vehicle, you would rehearse.
 2 Q. Okay, so it was about who would go where, once they had
 3 got out of the alpha, bravo and charlie cars. Is that
 4 right?
 5 **A. It wasn't -- the tactic has changed where you go, you**
 6 **have got this door -- we would practise as best we can**
 7 **but what happens out on the streets is totally different**
 8 **to when you practise, when you have got members of the**
 9 **public in your way and stuff like that. So even you**
 10 **might identify key roles, you know, say how the**
 11 **shotgunner if need be is coming up, you know, and**
 12 **deploying on to the vehicle. You would practise that**
 13 **but it could change.**
 14 Q. Yes, but the idea of it would be to learn as much about
 15 the geography of the vehicle, yes?
 16 **A. Yes.**
 17 Q. About what windows it had where?
 18 **A. Yes.**
 19 Q. What sight lines might be available into the vehicle,
 20 yes?
 21 **A. Yes, that's correct.**
 22 Q. And what might be the best approach to take to the
 23 vehicle --
 24 **A. Yes.**
 25 Q. -- if you were going to strike it in various

Page 25

1 orientations, yes?
 2 **A. Yes.**
 3 Q. On 3 March, and I am moving forward here --
 4 **A. Yes.**
 5 Q. -- did you conduct a rehearsal?
 6 **A. No, we didn't.**
 7 Q. On 2 March, the day before, did you conduct a rehearsal?
 8 **A. Not that I recall, no.**
 9 Q. We have heard some evidence that it was quite common to
 10 undertake these rehearsals, ie they happen more
 11 frequently than not on deployments.
 12 **A. Yes.**
 13 Q. Do you know why on these two occasions there was no
 14 rehearsal conducted?
 15 **A. Sometimes it might be that they want us to get up to the**
 16 **location as soon as. You know, other times it might be**
 17 **because you might have just done refresher training near**
 18 **to when it was, everyone was happy with what they were**
 19 **doing and the tactic and refreshed into it. That is all**
 20 **I can say. I can't really remember why we didn't do**
 21 **any.**
 22 Q. Was anything said out loud about why you were not going
 23 to?
 24 **A. Not that I recall, no, sir.**
 25 Q. Can you remember any particular urgency to get from the

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1 briefing, which finished at about 6.15, to the lay up
 2 point at Leigh?
 3 **A. I think they wanted us kitted up and up there, yes, but**
 4 **other than that, I don't know the reasons why.**
 5 Q. Can you remember any particular urgency though?
 6 **A. I can't recall, it is that long since.**
 7 Q. On 2 March, lastly, we are in tab 21 now, please, if you
 8 turn to page 1176.
 9 **A. Yes.**
 10 Q. Can you look at the bottom of the page. I think this is
 11 Chief Inspector Lawler speaking. Can you see the
 12 paragraph beginning, "Err ..."?
 13 **A. Yes, at the bottom.**
 14 Q. Yes:
 15 "... before we go into the threat assessment, we all
 16 need to be aware there is no current information or
 17 intelligence to say the subjects have either possession
 18 or immediate access to firearms or other less lethal
 19 weapons."
 20 Yes?
 21 **A. Yes.**
 22 Q. Just stopping there for the moment.
 23 **A. Yes.**
 24 Q. That would be very important information for you as
 25 an AFO to receive, wouldn't it?

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1 **A. Yes.**
 2 Q. Amongst the information that you received, it would be
 3 amongst the most important?
 4 **A. Yes.**
 5 Q. Because you are being told there about the current
 6 intelligence concerning firearms or other weapons, yes?
 7 **A. Yes.**
 8 Q. He, Mr Lawler, is saying that there isn't any?
 9 **A. Yes, on that briefing, he is, yes.**
 10 Q. Was that kind of statement, it might be a positive one,
 11 "We have got intelligence" or a negative one like this,
 12 "We haven't", a common feature of briefings?
 13 **A. Going back to what I said earlier, it varies from TFC to**
 14 **TFC how they present the briefing.**
 15 Q. I suppose as an AFO you would hope for some uniformity,
 16 wouldn't you, at least in relation to this issue?
 17 **A. Yes, they all do the same training and they take away**
 18 **their own ways of delivering the briefing.**
 19 Q. Whether or not there was current information and
 20 intelligence to suggest that the subjects that you were
 21 being asked later that day potentially to confront --
 22 **A. Yes.**
 23 Q. -- is critical information?
 24 **A. Yes, you would want to know if they were armed with**
 25 **weapons, yes.**

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<p>1 Q. He continues, Mr Lawler:</p> <p>2 "However, my assumption is that they are about to</p> <p>3 commit armed robbery based on their previous criminal</p> <p>4 behaviour. They will either have firearms or less</p> <p>5 lethal weapons, so you are all highly trained in</p> <p>6 judgment to again deal with threat that we may face at</p> <p>7 the time that we go to intercept them."</p> <p>8 A. Yes.</p> <p>9 Q. Reading that paragraph now, as a whole --</p> <p>10 A. Yes.</p> <p>11 Q. -- what do you understand Mr Lawler to mean?</p> <p>12 A. Well, at the time that there is no intelligence that</p> <p>13 they have got firearms, but it is not to say further on</p> <p>14 that they, you know, can get access to the firearms or</p> <p>15 lethal weapons.</p> <p>16 Q. There is no current intelligence that they have, but</p> <p>17 based on their previous behaviour they may have, yes?</p> <p>18 A. Yes.</p> <p>19 Q. The next day, on the 3rd, when Mr Granby gave the</p> <p>20 briefing, he said neither of these two things.</p> <p>21 A. I couldn't be 100 per cent what was said in that</p> <p>22 briefing, but if you are saying that is correct, that's</p> <p>23 correct.</p> <p>24 Q. We have the briefing at tab 23, yes?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 29</p>	<p>1 haven't, so they might"?</p> <p>2 A. Yes.</p> <p>3 Q. Is that what you do?</p> <p>4 A. Well, by the time it has got to this stage, there has</p> <p>5 been the relevant meetings, risk assessments and it has</p> <p>6 got to the point of -- because they don't deploy us</p> <p>7 lightly, so it has got to the point where there are</p> <p>8 firearms and just to say that there isn't -- they</p> <p>9 haven't got, there isn't intelligence to say that they</p> <p>10 have got firearms at that time, it is not to say that</p> <p>11 they might have access to them later on.</p> <p>12 Q. Maybe I am asking too much of you to recreate in your</p> <p>13 mind what your view would have been --</p> <p>14 A. Yes.</p> <p>15 Q. -- but do you think:</p> <p>16 "Well, hold on, one day a firearms commander has</p> <p>17 told us there isn't any specific intelligence that they</p> <p>18 have got firearms ..."</p> <p>19 A. Yes.</p> <p>20 Q. "... the next day the firearms commanders hasn't said</p> <p>21 anything about firearms."</p> <p>22 A. If I could remember that in the detail, it would, you</p> <p>23 know, spring to my mind thinking: why has someone said</p> <p>24 that? But I can't recall.</p> <p>25 Q. What would you take from it if it did spring to your</p> <p style="text-align: center;">Page 31</p>
<p>1 Q. The tape recording.</p> <p>2 A. Yes.</p> <p>3 Q. I mean it is 15 pages long, I don't necessarily want to</p> <p>4 spend time --</p> <p>5 A. Yes.</p> <p>6 Q. I have looked at it and we have looked at it before and</p> <p>7 Mr Granby, the TFC for the following day, doesn't give</p> <p>8 an assessment on whether there was intelligence that the</p> <p>9 subjects had firearms or other weapons, one way or the</p> <p>10 other. Would that be unusual?</p> <p>11 A. It varies from TFC to TFC what they would give.</p> <p>12 I would take whatever was given on that briefing</p> <p>13 that day.</p> <p>14 Q. Yes. What are you supposed to do as an AFO, you hear</p> <p>15 some briefings where the firearms commander is saying,</p> <p>16 "There is no current intelligence ..."</p> <p>17 A. Yes.</p> <p>18 Q. "... that the subjects have firearms."</p> <p>19 A. Yes.</p> <p>20 Q. Then the next day you attend a briefing and there is</p> <p>21 deathly silence on that topic.</p> <p>22 A. Right.</p> <p>23 Q. There is nothing.</p> <p>24 A. Yes.</p> <p>25 Q. What do you do, do you think, "He hasn't said that they</p> <p style="text-align: center;">Page 30</p>	<p>1 mind, "Hold on, he hasn't said anything about current</p> <p>2 intelligence on firearms"?</p> <p>3 A. Well, if different intelligence had changed that we were</p> <p>4 not privy to.</p> <p>5 Q. Can we move then to the 3rd.</p> <p>6 I think what happened on the 2nd was that you were</p> <p>7 deployed, you stayed laid up, and nothing happened.</p> <p>8 A. Right.</p> <p>9 Q. Is that right?</p> <p>10 A. I can't recall. Obviously nothing had happened because</p> <p>11 otherwise we wouldn't have been deployed the next day,</p> <p>12 but I don't recall that day.</p> <p>13 Q. I think you sat and waited until about 6.00 in the</p> <p>14 morning and nothing happened?</p> <p>15 A. Right.</p> <p>16 Q. Can we turn then to 3 March 2012.</p> <p>17 I think you were asked to attend early in the</p> <p>18 morning; is that right?</p> <p>19 A. Yes.</p> <p>20 Q. Can you --</p> <p>21 A. Do I need to refer to any of these documents?</p> <p>22 Q. No, we can put those away if you want.</p> <p>23 I think you were asked to attend a briefing early in</p> <p>24 the morning on 3 March; is that right?</p> <p>25 A. Yes, that's correct.</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

1 Q. I think in your statement you said you paraded at 4.45
 2 in the morning?
 3 **A. That's correct, yes.**
 4 Q. Without prying into your private life too much --
 5 **A. Yes?**
 6 Q. -- how far away do you live and therefore how long would
 7 it have taken you and therefore what time would you have
 8 had to get up?
 9 **A. Not that long.**
 10 Q. So what, half an hour?
 11 **A. Yes, something like that, maybe less.**
 12 Q. So what time do you think you were up in the morning
 13 then to get to a 4.45 briefing?
 14 **A. 4.00?**
 15 Q. We know that you stayed on duty until 6.30 the next
 16 morning, yes?
 17 **A. On the 4th?**
 18 Q. Yes.
 19 **A. Yes.**
 20 Q. You were awake, I think that is right, for 26-odd hours?
 21 **A. Yes, we had a load of down time during the deployment on**
 22 **this.**
 23 Q. In the course of that down time, were you laid up at
 24 Leigh police station?
 25 **A. That's correct, yes.**

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1 Q. Did you take the opportunity to sleep?
 2 **A. Yes.**
 3 Q. How much, how frequently?
 4 **A. I couldn't recall how much. Sometimes you go in the car**
 5 **to get a bit of quietness, some sleep, sometimes you**
 6 **would sit in the rest room, watch the telly, go on your**
 7 **phone, read a book.**
 8 Q. Was that quite a common occurrence, that there would be
 9 extended deployments of this kind?
 10 **A. Yes, a lot of what we end up doing is sitting around**
 11 **waiting.**
 12 Q. Are you well used to occupying yourself?
 13 **A. Yes.**
 14 Q. You parade at 4.45 and then attend a briefing; is that
 15 right?
 16 **A. That's correct.**
 17 Q. What is your recollection now of the briefing?
 18 **A. Just that it was a briefing about a group of individuals**
 19 **suspected of committing or going to commit an armed**
 20 **robbery.**
 21 Q. Was that the long and the short of it?
 22 **A. My recollection, yes.**
 23 Q. If we look, please, at the general bundle, number 2,
 24 please.
 25 THE CHAIRMAN: The one you had out before.

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1 **A. Thank you, sir.**
 2 MR BEER: At tab 22, please.
 3 **A. The briefing for the 3rd?**
 4 Q. Yes.
 5 Again, you were present for this, yes?
 6 **A. Yes, that's correct.**
 7 Q. We have the transcript of it that we have looked at at
 8 23, yes?
 9 **A. Yes.**
 10 Q. If we look at the intelligence case that was put to you
 11 at page 1267 at tab 22 --
 12 **A. Yes.**
 13 Q. -- there are four paragraphs on there, yes?
 14 **A. Yes.**
 15 Q. As to the first of them:
 16 "The subjects of this operation are believed to be
 17 engaged in armed robberies in the north-west region."
 18 Yes?
 19 **A. Yes.**
 20 Q. Firstly, "The subjects of the operation", did you
 21 understand that to mean the three people that you were
 22 then told about?
 23 **A. Yes, the three people that featured on the briefing.**
 24 **That's correct.**
 25 Q. "... believed to be engaged in armed robberies", did you

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1 understand "armed robberies" to mean robberies with
 2 firearms?
 3 **A. Armed or otherwise so dangerous, it could be baseball**
 4 **bats, axes, knives.**
 5 Q. "Armed robbery" did not necessarily mean firearms?
 6 **A. No.**
 7 Q. Similarly, over the page, at 1268, in fact it is the
 8 same on 1269 and 1270 where the intent of the three
 9 subjects is given as conspiracy to commit armed robbery,
 10 you wouldn't understand that to mean a necessary
 11 reference to firearms?
 12 **A. No, sir.**
 13 Q. As to the second paragraph:
 14 "There is intelligence to suggest that these
 15 subjects were responsible for a robbery in 2008 in
 16 Preston, where they broke into a bank and lay in wait
 17 for the staff to arrive. On their arrival they were
 18 held at gunpoint, shotgun and handgun, tied up and
 19 forced to hand over keys to the strong room. The
 20 subjects made good their escape with a substantial
 21 amount of money."
 22 **A. Yes.**
 23 Q. Would you understand "the subjects" to refer again to
 24 the three people that you were then briefed about?
 25 **A. Yes, to all three, yes.**

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<p>1 Q. You understood that you were being told that the very 2 three men that this operation was about had themselves 3 been responsible for a robbery in 2008 -- 4 A. Yes. 5 Q. -- where a shotgun and handgun had been used? 6 A. That's correct. 7 Q. Did you regard this as important information? 8 A. Yes. 9 Q. Yes? 10 A. Yes. 11 Q. I think you now know that a lot of this is false. 12 A. Yes, I do, sir. 13 Q. Yes. 14 But at the time, you presumably took it in good 15 faith that it had been through a system? 16 A. I took it that it had been, yes, it had been tested. It 17 ended up on one of our briefings and it would be 18 correct. 19 Q. The system that I just spoke about, you I think had seen 20 some of that in operation, not on this occasion but you 21 were aware of the process of risk assessment meetings. 22 Is that right? 23 A. That's correct, sir. 24 Q. Where the TFC would speak to the SIO of the operation or 25 the sponsor?</p> <p style="text-align: center;">Page 37</p>	<p>1 was in fact in 2005 not 2008 in Kirkham, and that there 2 was a weak intelligence case to suggest that Mr Totton 3 had had some involvement, that would have presented 4 a very different picture to you? 5 A. That's correct, sir, yes. 6 Q. The third and fourth paragraphs are not really about 7 background, are they, they are about current intentions? 8 A. That's correct, and I know from doing my statements, the 9 registration on the vehicle, we wrote that wrong on our 10 statements. 11 Q. I am going to come to that in a moment. 12 A. Yes. 13 Q. I am going to turn now to later events in the day and, 14 as you say, you have made some statements about what 15 happened later in the day? 16 A. That's correct, sir, yes. 17 Q. I just want to explore with you the circumstances in 18 which the statement came to be made, your first account. 19 A. Yes. 20 Q. We can put that bundle away now, although of course 21 I will get it out in about five minutes. 22 A. Thank you. 23 Q. In tab 1 of your own bundle there is a witness statement 24 dated 7 March 2012. Yes? 25 A. That's correct, yes.</p> <p style="text-align: center;">Page 39</p>
<p>1 A. Or a member of his team, yes, that's correct, sir. 2 Q. The tactical adviser would usually be present? 3 A. Yes, that's correct. 4 Q. And sometimes the OFC? 5 A. Yes. It would be ideal that the OFC would be there and 6 he might bring along a planner with him, yes. 7 Q. Was that more often than not the step that had preceded 8 a briefing such as this, namely a physical meeting? 9 A. Where I have been involved personally, if I have gone as 10 a planner, yes, that would be more often than not. 11 Q. Assuming time allowed it, rather than a short telephone 12 call? 13 A. Well, I can only go off my experience when I have gone 14 to these meetings and seen what has happened. I mean 15 I know from working in the environment that some people 16 will put a call in to see if it does substantiate 17 a firearms deployment and they will have a meeting 18 beforehand and you could go the meeting and they could 19 say, "No, you have got no firearms authority", so there 20 would be no need to call for planners with that one, but 21 you might still have an OFC and a TAC adviser, with the 22 sponsor there. 23 Q. Presumably, if you had been told that there was no 24 intelligence at all to suggest that Messrs Rimmer and 25 Grainger were involved in this alleged offence, which</p> <p style="text-align: center;">Page 38</p>	<p>1 Q. I think this witness statement, short as it is, was for 2 the purposes of the building a prosecution file, is that 3 right, concerning the subjects, in particular Mr Totton? 4 A. Yes, that's correct. 5 Q. You had to make a statement saying that you had arrested 6 him and you cautioned him and that he had made no reply 7 to caution? 8 A. Yes. 9 Q. Yes? 10 A. I can't say why it wasn't done on the night, because 11 normally we would do an arrest statement on the night. 12 Q. I am not too concerned about that for the moment. What 13 I am concerned is: do you know where you obtained the 14 time from, 7.10? 15 A. It is just from that -- I would think from my phone or 16 something like that. 17 Q. Okay. 18 A. You know, you would look at when the job happened and 19 then afterwards you might think, "Right, I have arrested 20 him at this time" and look at your phone. I can't 21 recall where the -- 22 Q. I think the 7.10 actually refers to the time of the 23 strike rather than the time of the arrest. 24 A. Right. 25 Q. Is that right? If you read it, I think that second</p> <p style="text-align: center;">Page 40</p>

<p>1 paragraph there is about the time of the strike and then 2 you say, "A short time later I arrested ..." 3 A. Yes, later on he was arrested, yes. 4 Q. Yes. You think you got the 7.10 from your own 5 information, as it were -- 6 A. Yes. 7 Q. -- rather than something you were told? 8 A. Yes. 9 Q. Then two days later on 9 March, if we move on a tab, we 10 have your witness statement dated 9 March 2012. Yes? 11 A. Yes, sir. 12 Q. This was six days after the event? 13 A. Yes. 14 Q. That is when you made your first account of the events 15 of Saturday, 3 March? 16 A. I think on the night I might have been asked -- because 17 they will say who has arrested who, so I might have just 18 said where I was in the car and who I had arrested and 19 that was it and I don't know if someone just jotted 20 a note down of that, but I didn't provide any statement 21 on the night. 22 Q. Who do you think might have jotted a note down? 23 A. There was that many people there on the night I couldn't 24 honestly tell you, I don't know. 25 Q. Was that part of the post-incident procedure?</p> <p style="text-align: center;">Page 41</p>	<p>1 and we wanted to give our statements. 2 Q. You were presumably getting frustrated, is this right, 3 because it was unusual to wait nearly a week to -- 4 A. It was an unusual set of circumstances, but yes, you 5 would want -- I know in like the PIP, when you have had 6 inputs and training, they will say give you a cool off 7 period but then, you know -- 8 Q. The cooling off period I think -- 9 A. 48 hours. 10 Q. Exactly, recommended in the manual of guidance is 11 48 hours. This was a little longer than that. 12 A. Yes, sir. 13 Q. Are you saying effectively that it was your desire to 14 make an account? 15 A. I think a few of us were voicing concerns and it wasn't, 16 you know -- 17 Q. Who was telling you not to make a statement? 18 A. It was just the advice given, because some of us didn't 19 want to be video or recorded interviewed by -- I don't 20 know if it was the IPCC or the investigation team. I 21 can't recall. 22 Q. So the IPCC or the investigation team wanted to video or 23 audio record you? 24 A. That is my recollection, yes. 25 Q. Yes, and you didn't want that to happen and why was</p> <p style="text-align: center;">Page 43</p>
<p>1 A. That's correct, sir, yes. 2 Q. Where was that? 3 A. I think we went to Openshaw first and then we went 4 across to Claytonbrook, so I think it was at 5 Claytonbrook where everything started to happen. 6 Q. This is your first written account -- 7 A. That's correct, sir, yes. 8 Q. -- of the events of 3 March? 9 A. Yes, that's correct, sir. 10 Q. What was the reason for the delay of six days in making 11 an account of what had happened on the night that 12 Mr Grainger had got shot? 13 A. Because it was an unusual set of circumstances -- 14 fortunately a lot of the jobs that we go on they do not 15 end up in a fatal shooting, sir -- we were being guided 16 into, like, when providing statements, I know there was 17 talk about us being interviewed or video recorded. 18 Q. You said, "We were guided into when to provide 19 statements". 20 A. That's correct. 21 Q. Who guided you into when to provide a statement? 22 A. I can't recall who it was. It was just advice and we 23 were given updates like the sergeant would come in and 24 say, "We are not doing statements yet", because some of 25 us were getting a bit frustrated that time was going on</p> <p style="text-align: center;">Page 42</p>	<p>1 that? 2 A. I, because, you know, people are vetted in the police, 3 I don't know who works for the IPCC, who is going to see 4 the video, know what job I do. So I would rather just 5 provide a normal statement like I do for everyday police 6 work. 7 Q. Any other reasons? 8 A. No, sir. 9 Q. Was it that debate about whether or not you should 10 provide an audio or video statement -- 11 A. That was my personal view, erm -- 12 Q. Hold on, if you just let me finish the question. 13 A. Oh, sorry. 14 Q. That is all right -- that caused the delay? 15 A. No, I just think it was toing and froing from the 16 various parties as to what was happening and ... 17 Q. In any event, it came to pass that on 9 March, which 18 I think was a Friday -- 19 A. Right. 20 Q. -- you ended up at Nexus House. Is that right? 21 A. That's correct, sir, yes. 22 Q. At about 1.15 in the afternoon. 23 A. Yes. 24 Q. Were you all gathered in a room together, all of the 25 AFOs?</p> <p style="text-align: center;">Page 44</p>

<p>1 A. As far as I am aware, yes.</p> <p>2 It was a big office room and we took like a desk</p> <p>3 each, you know.</p> <p>4 Q. Did you all make your statements at the same time?</p> <p>5 A. Yes.</p> <p>6 Q. Do you know how that came about, that you were all put</p> <p>7 in the same room together when making your first</p> <p>8 accounts?</p> <p>9 A. I just presume it was on advice given.</p> <p>10 Q. Were you party to any of the advice given?</p> <p>11 A. Not that I recall, no.</p> <p>12 Q. I think there was a flip chart as well, wasn't there?</p> <p>13 A. Yes, I think there was a flip chart at the front of the</p> <p>14 desk, yes.</p> <p>15 Q. That contained some information, didn't it, the flip</p> <p>16 chart?</p> <p>17 A. I didn't pay particular attention but yes, there was</p> <p>18 stuff written on it at various times, yes.</p> <p>19 Q. I am going to come to in a moment whether you paid</p> <p>20 attention to it and why not.</p> <p>21 A. Yes.</p> <p>22 Q. But there was a big flip chart at the front. Who wrote</p> <p>23 the flip chart?</p> <p>24 A. I cannot recall. I don't know. I remember someone,</p> <p>25 maybe a legal representative, there but other than that,</p> <p style="text-align: center;">Page 45</p>	<p>1 You have written:</p> <p>2 "At 04.45 hours I paraded."</p> <p>3 Yes?</p> <p>4 A. That's correct, sir.</p> <p>5 Q. You have not used the information on the flip chart?</p> <p>6 A. No, sir.</p> <p>7 Q. Why not?</p> <p>8 A. Because I knew -- for a firearms operation, they will</p> <p>9 say, say the briefing is at 6.00, they will say be in</p> <p>10 for 5.00 for a 6.00 briefing. I knew on that day,</p> <p>11 because I had problems finding my car keys, that I got</p> <p>12 in work at 4.45.</p> <p>13 Q. Why did you not write 4.30? You were being told this is</p> <p>14 the information?</p> <p>15 A. Because it is my statement, sir.</p> <p>16 Q. Exactly, and it would be wholly wrong, wouldn't it --</p> <p>17 A. Yes.</p> <p>18 Q. -- to write down 4.30 if that is not what happened?</p> <p>19 A. Yes.</p> <p>20 Q. I only ask because lots of other officers dutifully</p> <p>21 wrote down, "At 4.30 I paraded", yes?</p> <p>22 A. I can only answer for myself, sir.</p> <p>23 Q. Okay.</p> <p>24 Just moving on to the second event then. On the</p> <p>25 flip chart it says on the right-hand side underneath the</p> <p style="text-align: center;">Page 47</p>
<p>1 I can't recall.</p> <p>2 Q. Was there a lawyer or lawyers in the room then?</p> <p>3 A. I think there was one legal representative there but</p> <p>4 I couldn't be 100 per cent.</p> <p>5 Q. Was that from the force, ie the force solicitors'</p> <p>6 department or was that somebody that the federation had</p> <p>7 brought in?</p> <p>8 A. I couldn't tell you. I don't know and I can't recall.</p> <p>9 Q. If you look to your left-hand side, up on the chairman's</p> <p>10 bench, that is it, there should be three pieces of</p> <p>11 paper, which are a photocopy of photographs of the</p> <p>12 I think A1 flip chart which we have in the Inquiry room.</p> <p>13 A. Yes.</p> <p>14 Q. If you order them in this way: the first of them should</p> <p>15 be "TOD"; the second of them should be, "Red Audi"; and</p> <p>16 the third of them should be, "I made this statement ..."</p> <p>17 A. Yes.</p> <p>18 Q. If you can have open, please, your witness statement</p> <p>19 alongside it at tab 2.</p> <p>20 A. Yes.</p> <p>21 Q. I just want to explore very briefly if I can the extent</p> <p>22 to which you relied on the flip chart, yes?</p> <p>23 A. Yes.</p> <p>24 Q. Can you see the flip chart says:</p> <p>25 "TOD [tour of duty] 0430 hours on 3 March."</p> <p style="text-align: center;">Page 46</p>	<p>1 date:</p> <p>2 "Approximately 06.00 to 06.15."</p> <p>3 Can you see that?</p> <p>4 A. On which sheet, sir?</p> <p>5 Q. On the first page of the flip chart.</p> <p>6 A. Yes.</p> <p>7 Q. Underneath the date, "Approx 06.00 to 06.15", yes?</p> <p>8 A. Yes.</p> <p>9 Q. We have been told that that was intended to refer to the</p> <p>10 time of the briefing, yes?</p> <p>11 A. Yes.</p> <p>12 Q. In your statement you have put:</p> <p>13 "At 06.00 hours I was present at an operational</p> <p>14 briefing named Shire."</p> <p>15 Yes?</p> <p>16 A. Around -- yes, 0600 hours, present at an operational</p> <p>17 briefing, yes.</p> <p>18 Q. Do you think you took that time from the flip chart?</p> <p>19 A. I can't recall to tell you the truth.</p> <p>20 Q. Okay.</p> <p>21 A. Like I say, normally we could be given a specific hour,</p> <p>22 06.00 briefing, but the -- from the tape recording of</p> <p>23 the briefing it might say 06.05 the briefing started.</p> <p>24 Q. I think this one in fact started at 05.57.</p> <p>25 A. Right, but I can't say if I got it off that piece of</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

1 **paper or not, sir.**
 2 Q. The third piece of information on the flip chart, can
 3 you see by the second hole-punch:
 4 "18.15, Leave Leigh police station. Green."
 5 Yes?
 6 **A. Yes.**
 7 Q. Can you see in your witness statement you wrote, this is
 8 the last paragraph on the first page:
 9 "At around 18.00 hours on the same day, I along with
 10 other firearms officers were told to make our way to the
 11 vehicles. A short time later we made our way to a lay
 12 up point just outside Culcheth."
 13 Yes?
 14 **A. Yes.**
 15 Q. I think you are referring to the same event there.
 16 **A. Yes.**
 17 Q. The flip chart said the time of that event was 6.15 and
 18 you have said that it was at around 18.00 hours.
 19 **A. Yes.**
 20 Q. Again, why didn't you use the flip chart?
 21 **A. Because I have just got on with my statement, writing my**
 22 **statement as I remember it. They have put key -- the**
 23 **only thing that -- if you confer about or wanted to**
 24 **confirm was the registration of the vehicle and that**
 25 **ended up going wrong in the statement anyway. That is**

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1 **the only thing and that is why in the end I have written**
 2 **in, "I made this statement", because that was the only**
 3 **thing that I remember recalling on and being unsure**
 4 **on --**
 5 Q. You are jumping ahead a little bit, W9, but I understand
 6 why.
 7 **A. Sorry.**
 8 Q. You didn't use the time, "18.15 we left Leigh police
 9 station", no?
 10 **A. No.**
 11 Q. Why not? This was written up on a flip chart?
 12 **A. Because it was my statement, I couldn't recall the exact**
 13 **times. Sometimes, you know, being firearms officers we**
 14 **don't have our pocket notebook in the thing and write**
 15 **notes down. May do for a time of arrest, we might put**
 16 **the time on the back of our wrist, but I just did my**
 17 **statement and then the only thing I was unsure of was**
 18 **the registration of the vehicle.**
 19 Q. Yes. Just to finish off the last couple of bits of
 20 detail, can you see on the flip chart it says at 19.08
 21 you went to State Amber, yes?
 22 **A. Yes.**
 23 Q. On the second page of your witness statement, you said:
 24 "At around 19.00 hours we were put on State Amber."
 25 **A. Yes.**

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1 Q. Again, you haven't used the flip chart?
 2 **A. No, sir.**
 3 Q. Then, lastly, the flip chart says, "At 19.12 hours,
 4 State Red". In your second witness statement, you don't
 5 give the time of State Red, no?
 6 **A. No. No, sir.**
 7 Q. But in your first witness statement you said that it was
 8 at around 7.10?
 9 **A. That's correct, sir.**
 10 Q. Again, it doesn't look like you used the flip chart?
 11 **A. No, sir.**
 12 Q. Looking at it as a whole, taking a step back, would you
 13 agree it looks like you used your own recollection of
 14 events rather than what you were being told to write
 15 down. Is that accurate?
 16 **A. From my recollection, I was writing what I could**
 17 **remember and I thought were the times. You know, it is**
 18 **very precise, 18.50, I wouldn't have a clue what time**
 19 **I left Leigh police station so I just wrote my statement**
 20 **as I normally would.**
 21 Q. Is that because you would feel uncomfortable about
 22 taking times from a flip chart that had been written up
 23 on a board for you to use?
 24 **A. Should it go to a prosecution case, it is me that has to**
 25 **stand in court, hasn't it, and give evidence --**

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1 Q. A bit like now?
 2 **A. Like now.**
 3 Q. Would that be because you realised that you shouldn't
 4 write down that something had happened at a particular
 5 time when you did not know that for yourself?
 6 **A. Well, I put it as I had saw it. I didn't know the**
 7 **specific time so I put what I thought it was.**
 8 Q. Did you say anything to the other officers, perhaps you
 9 being slightly older, if I may?
 10 **A. Yes, no worries.**
 11 Q. And perhaps more streetwise than maybe some of your
 12 colleagues:
 13 "This is a bit rum, the flip chart idea at the
 14 front."
 15 **A. We were given advice and it wasn't on the stuff that**
 16 **I believed -- like I said, I didn't pay much attention**
 17 **to it but the stuff that was put on the flip chart, it**
 18 **wasn't about what people had said or seen, you know,**
 19 **their honest held beliefs, it was stuff you could get**
 20 **from say the firearms incident record of specific times**
 21 **they went on stuff. So it was stuff that you thought**
 22 **could not be disputed, so I don't know out of naivety,**
 23 **of being guided, because it was unusual set of**
 24 **circumstances, whether they went down that route.**
 25 **I can't answer for them, but I just did my statement how**

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1 **I did my statement.**
 2 Q. My question was really: did you say this to anyone else?
 3 **A. No, I didn't.**
 4 Q. "I am not doing that, I am not signing up to this
 5 enterprise. I am writing my own statement on what I can
 6 recall."
 7 **A. No, I didn't say that, sir, no.**
 8 Q. You have said that the one piece of information that you
 9 did take from the flip chart was the registration number
 10 of the vehicle.
 11 **A. Yes.**
 12 Q. Which is on the second page "LO08 LOD".
 13 **A. Yes.**
 14 Q. The one piece of information you did take was in fact
 15 wrong?
 16 **A. Yes, and that was -- I think it was even on the briefing**
 17 **as wrong, as well.**
 18 Q. It was wrong on one part of the briefing but correct on
 19 another part of it.
 20 **A. Yes.**
 21 Q. Sir, I wonder whether that would be a convenient moment?
 22 THE CHAIRMAN: Yes. We will take a five-minute break now.
 23 W9, if you would like to hang on there for a second,
 24 Mrs Shaw will come round and fetch you and escort you
 25 out.

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1 We will break until 11.45.
 2 (11.40 am)
 3 (A short adjournment)
 4 (11.54 am)
 5 THE CHAIRMAN: Yes, Mr Beer.
 6 MR BEER: Thank you.
 7 W9, you left the Openshaw complex after the
 8 conclusion of the briefing and went to Leigh police
 9 station and stayed there until about 6.00 that night.
 10 Yes?
 11 **A. That's correct, yes.**
 12 Q. Which is a period of sort of 11 or so hours, does that
 13 sound about right?
 14 **A. Yes, it does.**
 15 Q. In that 11 or so hours you have rested, I think?
 16 **A. Yes.**
 17 Q. I think you went out to get some food with your
 18 colleagues in the alpha car; is that right?
 19 **A. Yes.**
 20 Q. Did you receive any intelligence updates in the course
 21 of the 11 hours?
 22 **A. I think we had a couple of intelligence updates,**
 23 **I remember one where there might have been half a dozen**
 24 **of us in the canteen area at Leigh police station and**
 25 **the --**

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1 Q. Do you need the cypher sheet?
 2 **A. Yes, sorry, it has just gone.**
 3 **Well, where the OFC has come in and gives an update.**
 4 **I don't think everyone was there, I think he got the**
 5 **ones together that were in the canteen and then he might**
 6 **have gone out and then given a different intel brief to**
 7 **the people in the vehicles.**
 8 Q. Okay, and what was that about?
 9 **A. I think it might have just been -- I can't recall the**
 10 **detail, it might have just been something as simple**
 11 **like, "There is no change, there is still no movement",**
 12 **you know, but I remember on a couple of occasions we did**
 13 **have intel updates. I am not too sure if one of the**
 14 **subjects off the briefing -- I might be getting**
 15 **confused, whether he was seen out with his girlfriend at**
 16 **some point. I can't --**
 17 Q. I was going to ask you about that.
 18 First, did you receive any updates in the course of
 19 the day from the OFC or otherwise concerning whether or
 20 not the suspects were or were likely to be in possession
 21 of firearms?
 22 **A. No, but that was nothing unusual.**
 23 Q. Did you receive any updates in the course of the day
 24 concerning whether there was any further intelligence as
 25 to whether or not the suspects intended to commit

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1 a robbery?
 2 **A. Not that I recall, no.**
 3 Q. Did you receive an update, and this would have been at
 4 around or after 5.30 pm, that one of the subjects,
 5 Robert Rimmer, was known by the command team not to be
 6 in the vehicle, or would be unlikely to be in the
 7 vehicle, if it moved?
 8 **A. I seem to recall something that he might have been --**
 9 **I might have got this wrong or got it confused with**
 10 **another operation, that he was seen maybe with his**
 11 **girlfriend, but, you know, not out in the vehicle.**
 12 Q. Would that be important information for you and your
 13 colleagues to have received, that one of the three men,
 14 one of the three subjects about whom you had been
 15 briefed, was not going to be in the car?
 16 **A. It wouldn't be unusual that the person from, you know,**
 17 **the three that we had been briefed not to be there, but,**
 18 **you know, you have had an intelligence brief that it is**
 19 **going to be these three so you would take it on the**
 20 **merits of what it is.**
 21 Q. My question was not really whether it was usual or
 22 unusual, but it would be important information for you
 23 to know?
 24 **A. Yes.**
 25 Q. Conversely, were you told after about 5.30 pm that in

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<p>1 fact there was a third unknown male likely to be in the 2 car? 3 A. I think we were told there was three males in the car, 4 but I can't remember the exact information that 5 I received. 6 Q. Were you a party to any discussion with Q9 over what he 7 thought the subjects or some of them had been involved 8 in in terms of crime previously? 9 A. Not that I recall. I mean there was conversations gone 10 on -- I think Q9 was in the canteen at some point when 11 I was in there and there was a couple with my 12 colleagues, he might have been in there when the OFC 13 have come in -- 14 Q. X7? 15 A. X7, sorry, and come in and give an update. 16 Q. You cannot recall any particular conversation, I am 17 thinking one in which Q9 was saying, "I know something 18 about these men's past, about their involvement in 19 a robbery"? 20 A. I thought it was nothing that we hadn't been told on the 21 briefing, you know, in relation to the Bolton job. 22 Q. I don't think you were told anything on the briefing 23 about the Bolton job? 24 A. Right. Something in relation to a Bolton job, that is 25 all I can remember.</p> <p style="text-align: center;">Page 57</p>	<p>1 Q. You would have been in plainclothes? 2 A. Yes, that's correct, sorry. 3 Q. If you had any identifiable features, it would be 4 a strike jacket. Is that right? 5 A. That's correct, yes. 6 Q. Did that strike jacket have a flap or flaps on it? 7 A. Yes, it did, sir. 8 Q. One or two? 9 A. It had a small one near the breast pocket and one with 10 a zip at the back that could be folded out. I think my 11 one was a reflective one that had changed it over so 12 that at night time it could be seen. 13 Q. You cannot recall whether you were wearing that or not? 14 A. I can't, normally, because of the operations we were 15 involved in, if everyone has a strike jacket on and we 16 do have to get out in full, there might be different 17 colours of jacket, blue, black, green, but if you see 18 a number of people walking down the street and they have 19 all got a similar jacket on it would alert. So I can't 20 recall whether I had the jacket on that day, sir. 21 Q. Did you at any stage in this put on a police cap? 22 A. No, sir, because we ended up wearing respirators. 23 Q. Is it not possible to wear the respirator at the same 24 time as the cap? 25 A. It would fall off. In my experience of trying to do it</p> <p style="text-align: center;">Page 59</p>
<p>1 Q. Can you remember him being challenged by X7, and X7 2 saying something along the lines of, "No, you are wrong, 3 Q9, the people that committed the Bolton job were 4 convicted of it and it is not these three men"? 5 A. I can't recall that. 6 Q. No? 7 A. No, I wasn't paying that much attention. I mean we talk 8 amongst ourselves in there, we will have the intel 9 update and someone might say privately to them 10 afterwards. So I wasn't paying particular attention. 11 Q. After 6.00 pm you moved off from Leigh police station to 12 Culcheth? 13 A. Yes. 14 Q. Can you remember what you were told then as to why you 15 were moving off? 16 A. It is just the -- X7 had told us to get in the vehicles 17 and start making towards Culcheth. 18 Q. You were not told why? 19 A. I hadn't been given, you know, why we were moving, no. 20 Q. At this time, before State Amber was called, what were 21 you wearing? 22 A. It is that long ago I can't recall. I know I was asked 23 afterwards to provide a statement if I had any 24 identifying strike jacket on. Sometimes I wear it on 25 jobs, sometimes I don't. That is pure --</p> <p style="text-align: center;">Page 58</p>	<p>1 when we have done training they just fall off. 2 Q. On the assumption that you were not wearing your strike 3 jacket -- 4 A. Yes. 5 Q. -- you didn't have any identifiable markings as a police 6 officer, other than that you were wearing a respirator 7 subsequently? 8 A. Yes, that is correct. 9 Q. As you left in the vehicle -- this is in the alpha 10 vehicle, was W4 the driver? 11 A. That's correct, yes. 12 Q. Was Q9 the rear offside passenger? 13 A. That's correct. 14 Q. Was X7 the front nearside passenger? 15 A. That's correct. 16 Q. Were you the rear nearside passenger? 17 A. That's correct, sir. 18 Q. Did you have an MP5 carbine, a self-loading pistol and 19 a Taser with you? 20 A. I did, sir. 21 Q. On the accounts that you give, you left just after 6.00 22 and at about 7.00, you went to State Amber. That is 23 about an hour, yes? 24 A. Yes, sir. 25 Q. There are no references in your various statements to</p> <p style="text-align: center;">Page 60</p>

<p>1 receiving any updates in the course of that hour?</p> <p>2 A. Yes.</p> <p>3 Q. Is that right, that you received no updates in the hour</p> <p>4 before 7.00?</p> <p>5 A. There was stuff going on on the surveillance channel,</p> <p>6 you know, movements of individuals around there but</p> <p>7 I couldn't really recall the specifics.</p> <p>8 Q. Did you have a main set in the vehicle?</p> <p>9 A. Yes, we did.</p> <p>10 Q. Was that connected to the DSU surveillance feed</p> <p>11 effectively?</p> <p>12 A. That's correct, yes.</p> <p>13 Q. Was it also connected to the TFC or was he communicating</p> <p>14 with X7 by mobile phone?</p> <p>15 A. I can't recall, to tell you the truth. I know we have</p> <p>16 the surveillance channel, then we will have a handheld</p> <p>17 back-to-back firearms channels between the car. It</p> <p>18 would not be unusual for the TFC to ring the OFC.</p> <p>19 Q. You now cannot recall the details of what, if any,</p> <p>20 updates via the surveillance channel you received?</p> <p>21 A. No, to be honest, I couldn't.</p> <p>22 Q. You say in your statement, I am in tab 2, at the top of</p> <p>23 page 2:</p> <p>24 "As we headed towards Culcheth we received</p> <p>25 information over the radio as to where the red stolen</p> <p style="text-align: center;">Page 61</p>	<p>1 Q. It was firstly clear that it was parked in the car park;</p> <p>2 is that right?</p> <p>3 A. That's correct, sir.</p> <p>4 Q. Secondly, were you told that it was in the furthest bay</p> <p>5 on the right-hand side?</p> <p>6 A. That's correct, sir.</p> <p>7 Q. Thirdly, were you told that it was facing outwards?</p> <p>8 A. Yes, facing outwards and there was a fence behind it but</p> <p>9 I can't recall -- I didn't know what type of fence or</p> <p>10 height, just that it was a fence.</p> <p>11 Q. You were told that were you, that --</p> <p>12 A. Yes, I recall that and a hedge to the offside in the</p> <p>13 picture paint.</p> <p>14 Q. Those four or five pieces of information were useful and</p> <p>15 important pieces of information?</p> <p>16 A. That's correct, sir, yes.</p> <p>17 Q. And they are exactly what you would want to receive from</p> <p>18 a surveillance team?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Yes.</p> <p>21 You would expect X7, would you, on the basis of that</p> <p>22 information -- even allowing for the points you made</p> <p>23 yesterday about not being prescriptive and responding</p> <p>24 dynamically to situations -- to formulate a plan?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 63</p>
<p>1 Audi was positioned in the car park."</p> <p>2 Yes?</p> <p>3 A. That's correct, yes.</p> <p>4 Q. I just want to explore your understanding of the</p> <p>5 position of the Audi in the car park before you arrived</p> <p>6 at the car park.</p> <p>7 A. Yes.</p> <p>8 Q. Yes?</p> <p>9 Here, you say:</p> <p>10 "At that time [as you headed towards Culcheth] we</p> <p>11 discussed it briefly in the car, how we were going to</p> <p>12 position the vehicle and which side of the vehicle we</p> <p>13 would go."</p> <p>14 Yes?</p> <p>15 A. Yes, we had a quick discussion in the car. I can't</p> <p>16 recall if everyone was party to it, you know, whether X7</p> <p>17 was busy doing stuff on the radio or speaking to the</p> <p>18 TFC, I can't recall that, but as we were going towards</p> <p>19 we were saying, "Right, we could do this, what</p> <p>20 about ..."</p> <p>21 Q. Just before we get to what you were going to do, you</p> <p>22 say:</p> <p>23 "We received information over the radio as to where</p> <p>24 the red stolen Audi was positioned in the car park."</p> <p>25 A. From the surveillance commentary, sir, yes.</p> <p style="text-align: center;">Page 62</p>	<p>1 Q. Yes?</p> <p>2 A. A loose plan, yes.</p> <p>3 Q. Yes.</p> <p>4 If we see that paragraph at the top of the second</p> <p>5 page there, the third paragraph in, you appear to</p> <p>6 suggest that the plan was formulated as you headed</p> <p>7 towards Culcheth, yes?</p> <p>8 A. Yes, that's correct, sir.</p> <p>9 Q. It appears, is this right, that it had two elements to</p> <p>10 it, how you were going to position the vehicle. That is</p> <p>11 the alpha vehicle, yes?</p> <p>12 A. Yes.</p> <p>13 Q. And which side of the vehicle we, that is the occupants</p> <p>14 of the alpha vehicle, would go?</p> <p>15 A. That's correct, sir.</p> <p>16 From recollection I think it was something as simple</p> <p>17 as, "Alpha will take the offside and bravo will take the</p> <p>18 nearside".</p> <p>19 Q. The two elements to the plan, if I can break them down</p> <p>20 a bit more, the position of your vehicle was the first</p> <p>21 part of the plan and that was going to be, is this</p> <p>22 right, that the alpha vehicle was going to broadside</p> <p>23 itself --</p> <p>24 A. That's correct, sir.</p> <p>25 Q. -- and go to the nose of the Audi?</p> <p style="text-align: center;">Page 64</p>

1 **A. Yes -- the police Audi was going to go, yes, broadside**
2 **to the stolen red Audi.**
3 Q. It wasn't going to go nose to nose, no?
4 **A. No, that's correct, sir.**
5 Q. And it wasn't going to broadside the stolen Audi,
6 ie come into its nearside?
7 **A. The B-pillar you mean on the nearside?**
8 Q. Yes.
9 **A. That's correct, sir, yes.**
10 Q. Then the second element of the plan was where the
11 occupants of the alpha vehicle would go and you have
12 just said, I think, that was to the driver's side?
13 **A. Yes, the offside of the vehicle. That's correct, sir.**
14 Q. I just have three questions arising from that. To what
15 extent at this time was it appreciated that Mr Totton
16 was in the front passenger seat of the red Audi?
17 **A. I can't recall to tell you the truth. I mean I think we**
18 **were told there were three subjects in the vehicle.**
19 Q. We have heard some surveillance evidence already, indeed
20 we have the surveillance logs, that it was broadcast
21 that Mr Grainger was driving, that Mr Totton was the
22 front passenger and that there was an unknown occupant
23 in the back.
24 **A. Yes, I don't dispute that.**
25 Q. Do you remember receiving that information? Ie placing

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1 Mr Totton in the front seat?
2 **A. I remember two had been identified, the occupants of the**
3 **front two, yes, at some point throughout the day and**
4 **that there was an unknown third.**
5 Q. The second question arising then, can you help us with
6 the logic of this initial plan, as it was --
7 **A. Yes.**
8 Q. -- to deploy both X7 and you --
9 **A. Yes.**
10 Q. -- to the driver's side of the Audi, what was the logic
11 of that?
12 **A. Well, I would think X7, what he does to take that side,**
13 **because we were near that end and bravo would be coming**
14 **in behind us and they would be nearer, quicker, nearer**
15 **to get to the nearside.**
16 Q. I see. In order for that to be a workable and
17 reasonable plan, it would require it to be broadcast to
18 the bravo and charlie cars as well?
19 **A. And the delta, yes, correct.**
20 Q. In particular, the bravo car would need to know that two
21 of you, you and X7, were going to go to the offside of
22 the Audi and that they were going to be nearside only?
23 **A. Yes, that's correct, sir.**
24 Q. The third question, in accordance with the initial plan,
25 this is I think before Q9 said, "In fact I am going to

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1 stay in the vehicle"?
2 **A. Yes.**
3 Q. How would Q9 be able to cover for you as he got out of
4 the vehicle?
5 **A. Before we spoke about how he was going to do it?**
6 Q. Yes, before he said, "Hold on I am going to stay in the
7 vehicle, wind the window down and provide cover from
8 within the vehicle", was it the plan for him to get out?
9 **A. Well, I can't recall the exact conversation but it might**
10 **be X7 had said something like, "Alpha will take the, you**
11 **know, the driver's side of the vehicle and bravo take**
12 **the nearside".**
13 **And it might have been on the initial plan that all**
14 **three of us would have got out on that, it is not that**
15 **prescriptive but then as we have rolled in, because**
16 **I could have end up getting out and putting cover on**
17 **from outside the vehicle, but it would have take time to**
18 **put cover on. So that is why we had a discussion on the**
19 **car as to how we were going to do it.**
20 Q. If you just look at this paragraph at the top of the
21 page there, the one we are looking at.
22 **A. Yes.**
23 Q. It says second line:
24 "We discussed briefly how we were going to position
25 the vehicle, which side we would go to."

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1 **A. Yes.**
2 Q. "Then X7 gave an outline of the plan over the radio."
3 **A. Yes.**
4 Q. Then you say:
5 "I can't recall the exact conversation, but Q9 asked
6 what we thought of him putting cover on from the vehicle
7 due to the position of the stolen red Audi."
8 **A. Yes.**
9 Q. "I remember saying that this was a good idea. I cannot
10 remember what the other two said as there was radio
11 traffic."
12 **A. Yes.**
13 Q. That appears to suggest that the first part of the plan
14 was that Q9 was going to get out as well, X7 broadcast
15 that but then there was a change of plan with Q9 saying,
16 "I am going to stay in the vehicle, put cover on from
17 the rear seat".
18 **A. That's correct. A lot of what we do in firearms is like**
19 **cover and movement, approaching thing and having cover,**
20 **a right of reply, should we need to. And when it was**
21 **discussed in the car I thought it was a good idea,**
22 **because he is not having to get out of the car, cover is**
23 **onto that vehicle as quickly as possible.**
24 Q. A few questions arising from that.
25 Firstly then, in accordance with the initial plan,

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1 with Q9 getting out, how would he have been able to
 2 provide cover for you and X7 as you ran to the offside?
 3 **A. He might not have been the cover officer, sir. I could**
 4 **have ended up doing it, you know, or the alpha 1, X7,**
 5 **could have done it over the bonnet of the vehicle.**
 6 Q. The second question then is that, given that there was
 7 a change of plan after X7 had, on your account,
 8 broadcast the first plan to the rest of the team, did X7
 9 broadcast the change of plan, ie the one where Q9 stays
 10 in the vehicle and provides cover?
 11 **A. I couldn't say, you know, I don't know what X7 said over**
 12 **the radio.**
 13 Q. I think it is fair to say you don't describe any such
 14 second broadcast in your statements, do you?
 15 **A. No, sir, I don't.**
 16 Q. Are you sure that either or both of these plans were
 17 broadcast over the radio to bravo, charlie and delta
 18 cars?
 19 **A. Well I heard X7 give, you know, what alpha are doing,**
 20 **what bravo are doing, whether the cars have received it,**
 21 **whether he has had the press all put in, I couldn't tell**
 22 **you, sir.**
 23 Q. I am just going to test your account in a couple of
 24 ways.
 25 Firstly we have heard from a large number of AFOs in

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1 the bravo and charlie cars.
 2 **A. Yes, sir.**
 3 Q. The evidence that they have given is really that there
 4 wasn't a broadcast by X7 as to a plan. It only appears
 5 to be those of you in the alpha car, alongside X7, who
 6 say that this broadcast happened. Were there any
 7 problems with the radio, as far as you were aware?
 8 **A. Not that I recall, no. I would have had my body set on**
 9 **but I wouldn't have had it turned on, I would have had**
 10 **an earpiece in with the gateway open.**
 11 Q. You obviously know that this should have been broadcast,
 12 don't you?
 13 **A. Yes, yes. And as far as I was aware, X7 give the**
 14 **initial plan. I don't know whether he gave a subsequent**
 15 **update to say X7 would give cover on from the vehicle, I**
 16 **couldn't tell you.**
 17 Q. Q9 gave cover on --
 18 **A. Sorry, sorry, Q9.**
 19 Q. The second way I want to look at it is you see here in
 20 this account you have this happening as you headed
 21 towards Culcheth, yes?
 22 **A. Yes, as we were coming through the village, yes.**
 23 Q. It doesn't say that, does it, it says:
 24 "As we headed towards Culcheth we received
 25 information over the radio, we discussed it briefly and

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1 then X7 gave an outline of the plan."
 2 Yes?
 3 **A. Yes.**
 4 Q. If you just remember that, the way that is recorded --
 5 **A. Right.**
 6 Q. -- and then go to the account that you gave subsequently
 7 in interview to the Operation Idris team at tab 8,
 8 please.
 9 **A. Yes.**
 10 Q. Can you look, please, at page 115 in the top right and
 11 bottom right of each page.
 12 Do you have 115?
 13 **A. Yes.**
 14 Q. Do you see the box which says "07.37" in it?
 15 **A. Yes.**
 16 Q. About five or six lines from the bottom of that box --
 17 **A. From the bottom?**
 18 Q. Yes, five or six lines from the bottom of the 07.37 box
 19 you say:
 20 "We discussed before, as we drove on to the car park
 21 there was a discussion with Q9, there was stuff going on
 22 the radio, we formulated a bit of a plan and it was
 23 discussed in the car."
 24 **A. Yes.**
 25 Q. "I don't know whether X7 and W4 replied to it, but

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1 I remember saying at the time to Q9, 'It is a good idea,
 2 yeah, do that'.
 3 **A. Yes.**
 4 Q. Then the interviewer asks you:
 5 "So in those circumstances that was the best tactic
 6 to use?"
 7 And you say, "Yes".
 8 **A. Yes.**
 9 Q. He says:
 10 "Okay, exposing the driver of the vehicle and Q9 to
 11 greater risk, would you say there was greater risk in
 12 those circumstances or the same risk whichever tactic
 13 you used?"
 14 And then you answer it, yes?
 15 **A. Yes, that's correct.**
 16 Q. Then you go on to some other questions about a related
 17 topic but if you go over to 117, please, and the middle
 18 box in between the two hole-punches, you say:
 19 "Well after we discussed what the -- a discussion
 20 was held in the cars, as we are rolling in."
 21 **A. Yes.**
 22 Q. "... because that, that is one of your first
 23 opportunities, you get a look at the ... even though you
 24 get a picture paint off a surveillance operative, it is
 25 one of the first times you will get a look to see

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<p>1 actually how it is going on the ground." 2 A. Yes. 3 Q. "I mean you know I remember seeing the subject car at 4 the top right of the car park as we are coming and 5 they've -- I have just concentrated on, you know, we 6 have discussed it like, how, where, you know, quick and 7 it just quick right, will do this and I think the X7 8 plan was me and him were to go ..." 9 A. "Around the bonnet" that should read. 10 Q. "... round the bonnet of the vehicle." 11 A. Yes. 12 Q. And the interviewer says: 13 "Of your vehicle?" 14 And you say: 15 "Yes, of our vehicle. 16 "The alpha vehicle? 17 "Yes, yes, of the alpha vehicle and we were going to 18 strike on the driver side of the vehicle and as we were 19 coming in my concentration ..." 20 Then you carry on? 21 A. Yes. 22 Q. In this account, you appear to be saying that the bit of 23 a plan, as you described it, was as you were rolling in 24 with eyes on the subject. Which is rather different 25 from as you were heading towards Culcheth, isn't it?"</p> <p style="text-align: center;">Page 73</p>	<p>1 years after. Isn't it. 2 Q. Is it because you don't say in this account here, in 3 interview, that it was broadcast to the other cars but 4 because by then, two years on, you knew that the other 5 officers wouldn't support you that it had been 6 broadcast, ie the officers in the bravo and charlie 7 cars? 8 A. No, that weren't the case at all. I have just said what 9 I believed to have happened. 10 Q. Is the fact that your accounts on the face of it have 11 varied over time as to when the plan was formulated, 12 your first account being as you drove to Culcheth -- 13 A. Yes. 14 Q. -- this interview being as you rolled into the car park, 15 because in fact there was no such discussion or 16 broadcast and in fact what happened was at the scene you 17 were left to fill in as necessary? 18 A. No, that is not the case, because otherwise I would have 19 gone with his plan, wouldn't I, and I didn't do what he 20 said. 21 Q. If it was part of your discussion that Q9 was going to 22 stay in the car and provide cover through the rear 23 window of the car -- 24 A. That's correct, sir, yes. 25 Q. -- that was important information for the other cars to</p> <p style="text-align: center;">Page 75</p>
<p>1 A. I can only think that we have talked about a brief plan 2 of what we were going to do and then as we are going on 3 to the car park, we have just confirmed what we were 4 going to do. And then that is when we have seen -- 5 well, when I have seen the slight changes. Of what it 6 was like on the ground. 7 Q. You don't say here that X7 broadcast the plan to any of 8 the other vehicles, do you? 9 A. In which one, in the later interview? 10 Q. Yes. 11 A. No, I don't. 12 Q. You say: 13 "It was discussed in the car ..." 14 A. Yes. 15 Q. "... I don't know whether X7 or W4 replied to it ..." 16 A. That's correct, yes. 17 Q. "... but I remember saying to Q9, 'It is a good idea.' 18 A. Yes. 19 Q. If you were not sure whether X7 replied to Q9's 20 suggestion, how could you have previously said that in 21 fact X7 had broadcast the plan over the radio? 22 A. I remember him saying something of the plan that we 23 discussed in the car again, after saying we will do this 24 and then he has repeated it. And I don't know why it is 25 not in the interview there, but the interview is two</p> <p style="text-align: center;">Page 74</p>	<p>1 know, wasn't it? 2 A. Yes, it is, sir. 3 Q. In particular because the other officers wouldn't wish 4 to enter Q9's arcs? 5 A. No, they wouldn't. But saying that, Q9 would be highly 6 trained and if someone would step in his arc he would 7 shout "No reply". 8 Q. Are you confident that that happened because in fact we 9 have heard -- 10 A. I am not saying what has happened, I am just saying that 11 I am confident the training we would do, if someone did 12 step in his arc he would shout "No reply", because that 13 is what we are trained to. 14 Q. We will ask Q9, maybe later today or tomorrow, whether 15 that happened when somebody ran across his arc, across 16 the bonnet -- 17 A. I don't even -- I only through reading transcript that 18 I know of that happened, so -- 19 Q. That somebody ran across the bonnet through Q9's arc? 20 A. Yes, apparently so. 21 Q. That the second reason that officers in the bravo and 22 charlie cars would want to know that Q9 was providing 23 cover from the rear of the vehicle was so that they may 24 have confidence that the subjects in the front of the 25 vehicle were being covered?</p> <p style="text-align: center;">Page 76</p>

<p>1 A. Yes, that's correct, sir.</p> <p>2 Q. On the approach to the vehicle, by the time you were</p> <p>3 rolling in the entrance of the car park, what did you</p> <p>4 know as to how many occupants of the vehicle there were?</p> <p>5 A. I just think there was three vehicle -- three people in</p> <p>6 the vehicle and I can't recall whereabouts in the back</p> <p>7 the third one was, but that there was three people in</p> <p>8 the vehicle.</p> <p>9 Q. Can you recall that in fact it was broadcast on the</p> <p>10 surveillance channel that there had been a very</p> <p>11 significant moment in the operation, namely a total loss</p> <p>12 of surveillance on the subjects for 13 minutes or so?</p> <p>13 A. From my own personal recollection of events, I can't</p> <p>14 recall that.</p> <p>15 Q. If there had been, as I think from your reading the</p> <p>16 transcripts you will have appreciated --</p> <p>17 A. Yes, that there was.</p> <p>18 Q. -- that that was indeed the case.</p> <p>19 A. Yes.</p> <p>20 Q. Not having eyes on the car for about 13 minutes or so</p> <p>21 would be something of a disaster, wouldn't it?</p> <p>22 A. Yes, it is vital importance, yes.</p> <p>23 Q. Can you recall whether there was an imperative broadcast</p> <p>24 across the radio from the commanders that they needed to</p> <p>25 know if the subjects were in the vehicle?</p> <p style="text-align: center;">Page 77</p>	<p>1 sir.</p> <p>2 Q. As you rolled on to the car parks, did you hear X7 say,</p> <p>3 "Strike, strike."</p> <p>4 A. Yes, I did.</p> <p>5 Q. At this point, when he, X7, said, "Strike, strike",</p> <p>6 where was the car?</p> <p>7 A. Well, we were virtually a few feet away from it.</p> <p>8 Q. A few feet away from the stolen Audi?</p> <p>9 A. Yes.</p> <p>10 Q. What position was Q9 in at that stage?</p> <p>11 A. Q9, I think he was getting ready to put cover on out of</p> <p>12 the window.</p> <p>13 Q. He was sitting next to you?</p> <p>14 A. Yes, that's correct.</p> <p>15 Q. In the rear seats?</p> <p>16 A. Yes.</p> <p>17 Q. Did you see him up on one knee?</p> <p>18 A. He was moving position. I couldn't say what position he</p> <p>19 was getting into, I would be busy getting my kit ready</p> <p>20 and getting to do whatever role I was going to do.</p> <p>21 Q. I am describing, I think, Q9's account that he was</p> <p>22 balancing on one knee with one leg in the rear footwell</p> <p>23 of the vehicle, the second knee, I think his right knee,</p> <p>24 on the seat, the rear seat of the Audi with his lower</p> <p>25 leg tucked under himself. Does that ring a bell?</p> <p style="text-align: center;">Page 79</p>
<p>1 A. Me personally, I can't recall that.</p> <p>2 Q. Can you recall a broadcast that led to two DSU officers</p> <p>3 being sent on to the car park, one on foot and then one</p> <p>4 in a car?</p> <p>5 A. I recall there being a DSU operative on the car park but</p> <p>6 other than that, I can't elaborate any more than that,</p> <p>7 sir.</p> <p>8 Q. Can you recall that the first operative was unable to</p> <p>9 get sight on the car --</p> <p>10 A. I can't recall, sir.</p> <p>11 Q. -- and its occupants, and the second of them could see</p> <p>12 that the car was occupied but not the number of</p> <p>13 occupants or the identity of them?</p> <p>14 A. I can't recall that, sir, no.</p> <p>15 Q. As you rolled on to the car park, could you see any</p> <p>16 members of the public in the near vicinity?</p> <p>17 A. Not as we rolled on to the car park, no.</p> <p>18 Q. At any time up until --</p> <p>19 A. I think as we came through the village, there might have</p> <p>20 been a few people in the village. It wasn't</p> <p>21 particularly busy, a few people but none near the car</p> <p>22 park, no, sir.</p> <p>23 Q. On the car park, at any stage did you see members of the</p> <p>24 public other than the three subjects?</p> <p>25 A. Not from where I was focused or when we drove in, no,</p> <p style="text-align: center;">Page 78</p>	<p>1 A. My focus is when we were driving into the car park is</p> <p>2 having a quick look through the windscreen and you are</p> <p>3 used to, when you are about to, you know, conduct</p> <p>4 a strike on a vehicle, you will get knocked by your oppo</p> <p>5 on the back seat or whatever as you are getting your kit</p> <p>6 together and that.</p> <p>7 But I was focused -- I had a quick focus through the</p> <p>8 windscreen to see where the vehicle was and the layout</p> <p>9 of the car park, and then I have angled myself. So</p> <p>10 there was movement at the side of me, I couldn't say</p> <p>11 what position his legs were in or anything like that,</p> <p>12 sir, no.</p> <p>13 Q. You said you angled yourself, do you mean you angled</p> <p>14 yourself towards your door --</p> <p>15 A. That's correct, sir.</p> <p>16 Q. -- the nearside rear door?</p> <p>17 A. Yes, after I had looked out of the windscreen to see the</p> <p>18 red stolen Audi.</p> <p>19 Q. Did you therefore not see Q9 holding his gun in one hand</p> <p>20 with his finger on the window switch in the other?</p> <p>21 A. To tell you truth, sir, I was not paying much attention</p> <p>22 to Q9 at that point.</p> <p>23 Q. Okay.</p> <p>24 The vehicle stopped, is that right?</p> <p>25 A. Yes, that's correct.</p> <p style="text-align: center;">Page 80</p>

1 Q. At the point of stopping, were you the first out of the
 2 vehicle?
 3 **A. Yes, I was.**
 4 Q. I think you ran down the nearside of the alpha car and
 5 around the back of it; is that right?
 6 **A. That's correct, yes.**
 7 **As we were rolling on, from the plan that X7 had**
 8 **given, I --**
 9 Q. You didn't follow it?
 10 **A. I didn't follow it.**
 11 Q. If we look, please, in folder 2, at tab -- I'm always
 12 a bit nervous about this, tab 28, mine are always in the
 13 wrong one.
 14 Do you have some plans?
 15 **A. Aerial pictures.**
 16 Q. I am looking for these diagrams?
 17 THE CHAIRMAN: They are also in -- there are some also in
 18 tab 28 nearer the back.
 19 MR BEER: It is page at the 586 top right and it looks like
 20 that, it is a picture of four coloured rectangles.
 21 (Indicates)
 22 THE CHAIRMAN: That is in tab 28, page 586.
 23 **A. Yes, I have got that. Thank you, sir.**
 24 MR BEER: Thank you. Thank you very much.
 25 Can you just, using the four coloured rectangles --

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1 do you agree that that roughly depicts the position of
 2 the subject car, alpha, bravo and charlie vehicles?
 3 **A. Yes, roughly. I don't know like what length of the**
 4 **bonnet was at what end, what length of the boot, but,**
 5 **you know, that is how the block was on, yes.**
 6 Q. Okay.
 7 Can you tell us by reference to that, what you did
 8 then. So you are out of the rear nearside door of the
 9 alpha vehicle?
 10 **A. Yes, can I just cover why I didn't go along with X7's**
 11 **plan?**
 12 Q. I am going to ask you where you went first and then ask
 13 you why you didn't follow X7's plan.
 14 **A. Right, I have come out of the nearside of the vehicle,**
 15 **of the police Audi, I have run round the back of the**
 16 **police Audi.**
 17 Q. Yes.
 18 **A. In between the blue -- both police vehicles, alpha and**
 19 **bravo.**
 20 Q. Just stopping there, as you ran round the rear of the
 21 police Audi --
 22 **A. Yes.**
 23 Q. -- was the bravo vehicle still approaching at this time,
 24 just coming to a stop?
 25 **A. Yes.**

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1 Q. Thank you.
 2 I think you had been told in the briefing, earlier
 3 in the morning, not to run in between police vehicles?
 4 **A. No, it is in between a police vehicle and the subject**
 5 **vehicle.**
 6 Q. Just picking up on that, then.
 7 **A. Yes.**
 8 Q. If you go back to tab 23, I think it is at 334.
 9 **A. Yes.**
 10 Q. If you look at the fourth line:
 11 "Okay a risk assessment. MASTS officers not to
 12 alight from or move between our vehicle and the subject
 13 vehicle or alight from moving vehicles."
 14 Yes, which is what you have I think just told us, is
 15 that right?
 16 THE CHAIRMAN: Sorry, could I have that page reference
 17 again?
 18 **A. Yes, 334.**
 19 MR BEER: 344.
 20 THE CHAIRMAN: 344.
 21 **A. Oh, sorry.**
 22 MR BEER: On tab 23.
 23 **A. Yes:**
 24 **"MASTS officers not to alight from or move between**
 25 **our vehicle and the subject vehicle or alight from**

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1 **moving vehicles."**
 2 Q. That doesn't tell you you are not to go between your
 3 vehicles?
 4 **A. No, you can run between police vehicles but it is not**
 5 **a good idea to run between your vehicle and the subject**
 6 **vehicle because if he wants to force his way out and we**
 7 **have had people run over, you are going to get trapped**
 8 **in between the car.**
 9 Q. Yes. Just look back at the previous tab, tab 21, at
 10 page 1185. Do you have that?
 11 **A. 1185, yes.**
 12 Q. Yes, the second paragraph from the bottom, where the
 13 equivalent risk assessment is read out:
 14 "Risk assessment, MASTS officers not to alight or
 15 move from between our vehicles and the subject
 16 vehicles."
 17 That is not as clear, is it?
 18 **A. No, it isn't, but I can see where you have got the**
 19 **confusion there, sir. But no, you can run in between**
 20 **police vehicles, the drivers are aware of it. It is not**
 21 **a good idea to run between a subject vehicle and**
 22 **a police vehicle.**
 23 Q. Thank you.
 24 If we go back then to our tab with the rectangles in
 25 at page 586. So you got out, went back down the rear

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<p>1 quarter, nearside quarter of the vehicle, across the 2 boot? 3 A. Yes. 4 Q. Yes? 5 A. Yes, and then ran towards the stolen red Audi. 6 Q. That was not the plan that had been agreed at all -- 7 THE CHAIRMAN: Across the boot? 8 MR BEER: I didn't mean stepping on the boot. Passing by 9 the boot. 10 THE CHAIRMAN: Round the back? 11 MR BEER: Yes, thank you. 12 THE CHAIRMAN: Sorry, it is just so I understand this. 13 MR BEER: Yes. 14 That was not the plan that had been agreed at all, 15 was it? 16 A. No, that wasn't the plan, sir. 17 Q. You were, on the plan, meant to be backing X7 up on the 18 offside of the Audi? 19 A. Yes. 20 Q. Yes? 21 A. Yes, that's correct, sir. 22 Q. On the basis of your witness statement of what you have 23 said about what had been broadcast -- 24 A. Yes. 25 Q. -- that would have surprised the occupants of the bravo</p> <p style="text-align: center;">Page 85</p>	<p>1 Q. If we go back to tab 2 of your bundle, page 108. 2 A. Of? 3 Q. Page 2 of your witness statement, or page 108 depending 4 which numbering you are on. 5 A. Yes, got it. 6 Q. In tab 2? 7 A. Yes. 8 Q. If you look at the third and fourth paragraphs there, 9 the two big paragraphs. 10 A. Yes. 11 Q. I don't think you actually say there which side of the 12 car the plan was you should go to, do you? 13 A. No, I don't, sir. No. 14 Q. I don't think in that witness statement there you say 15 that you changed the plan on the spur of the moment. 16 A. No, I have just put what I did when I got out of the 17 car. 18 Q. Why was it that in this witness statement you didn't say 19 what the plan was and that on the spur of the moment you 20 decided not to follow it and to go somewhere that wasn't 21 in the plan? 22 A. It is just how I have written my statement. I have not 23 put it in. I don't know why I have not put it in but 24 I have just put in what my actions were and where 25 I went.</p> <p style="text-align: center;">Page 87</p>
<p>1 car? 2 A. Yes, but we trained for that and, like I said, it is not 3 a prescribed, as in which doors you go to anymore. You 4 look at the situation, take it in and you look for gaps 5 and fill in. 6 Q. So then, why did you change the plan? 7 A. The reason why, as we were driving in I have looked out 8 of the front of the police Audi, I have seen where the 9 stolen red Audi is and as we have been driving towards 10 it I see the hedge -- that I was aware of beforehand, 11 but I didn't realise how near to the offside of the 12 stolen Audi it was. And I know by the time we have got 13 our nose of the Audi in, it is going to be tight to get 14 round the front of our vehicle and get to that side. 15 And the thing you want to do on a vehicle strike is get 16 the people contained in it, so I thought, with -- 17 because with this strike, the alpha is going to be 18 stationary before the bravo. So we will be quicker 19 containing it, so X7 was to go round the front, I would 20 come round the back and we would have it boxed in, at 21 least an operative either side. 22 The only escape route then, and I didn't know at the 23 time, but was what the fence was at the back should 24 anyone want to make a good escape, because the block 25 seemed good enough.</p> <p style="text-align: center;">Page 86</p>	<p>1 Q. On the change of plan, what cover would there be on X7 2 after your decision not to follow him? 3 A. What cover? 4 Q. Yes. Yes, who would be looking after X7's interests? 5 A. Well, we appreciate from the tactic that it is dangerous 6 and the people we are coming up against, he has got his 7 own firearms with him, he has got cover on the vehicle 8 from Q9, and then the bravo team that are arriving, they 9 would be looking seeing where people are going and fill 10 in accordingly. 11 So he would be getting support off the next car 12 turning up. 13 Q. On the plan there were two of you going down the 14 offside? 15 A. Alpha, yes, alpha was going down the offside. 16 Q. So you could each look after each other, yes? 17 A. Well, we had another team arriving and, you know, it is 18 a dynamic thing and you have got to think on your feet 19 and for containing that vehicle, I looked out of the 20 window and thought it is going to be tight to get 21 between that hedgerow and towards the drive's side of 22 the door and I want to contain the vehicle, stop people 23 running off from it. So I am going to go this way and 24 I made that -- 25 Q. The same would apply to the bravo team, wouldn't they,</p> <p style="text-align: center;">Page 88</p>

<p>1 they would have to arrive a little after you, run down 2 past your car, get around the hedge, which you thought 3 was difficult to negotiate, to support X7? 4 A. Yes. 5 Q. I am essentially asking: did you appreciate that this 6 may have left X7 exposed? 7 A. He had his own weaponry and he had cover on from 8 a colleague, and at that time the subjects were 9 contained in the vehicle. I just wanted to contain the 10 people in that area and stop anyone from escaping. 11 Q. On that page of your witness statement, page 2, about 12 halfway through the main paragraph, you say, this is by 13 the second hole-punch. 14 A. Yes. 15 Q. "As I ran round the back of alpha car I heard someone 16 shouting 'armed police, show me your hands'." 17 A. That's correct, yes. 18 Q. Is that right? 19 A. Yes. 20 Q. How long after the car, your alpha car, had come to 21 a stop, did you hear somebody shout "Armed police, show 22 me your hands"? 23 A. Literally as we had come to a stop. You know, we had 24 been getting out of the vehicle, as it is in the 25 statement.</p> <p style="text-align: center;">Page 89</p>	<p>1 door -- 2 A. Yes. 3 Q. -- to make your way down the short distance of the rear 4 nearside quarter of the alpha car -- 5 A. Yes, sir. 6 Q. -- and be making your way round the back of the alpha 7 car, yes? 8 A. That's correct, sir, yes. 9 Q. Between the stop and that happening -- 10 A. Yes. 11 Q. -- what is that, three, five seconds? 12 A. Yes, a few seconds, sir, yes. 13 Q. Would three to five seconds be an unfair estimate? 14 A. What, from me getting out to getting to the back of the 15 Audi? 16 Q. Yes. 17 THE CHAIRMAN: From the back of the police Audi you are 18 talking about, the alpha car. 19 MR BEER: Yes, the police Audi. 20 A. Yes. Yes. 21 Yes, you know three seconds, something like that, 22 you know. 23 MR BEER: How long after the shout "Show me your hands" went 24 up did you hear a shot? 25 A. Seconds.</p> <p style="text-align: center;">Page 91</p>
<p>1 Q. That is not how you describe it in the statement, that 2 you heard it as the vehicle came to a stop or as you got 3 out of the vehicle. 4 A. Yes. 5 Q. You have got it as you were running round the back of 6 the alpha car you heard somebody shout it. 7 A. As you appreciate, sir, I am trying to explain to you in 8 a couple of seconds everything that I recall. So you 9 know, that paragraph there has all happened in split 10 seconds. 11 Q. If it was as you ran around the back of the car that you 12 heard someone shout "Armed police, show me your hands", 13 yes? 14 A. Yes. 15 Q. Appreciating the point that you have just made that 16 these are dynamic events and things don't happen in 17 a sequence necessarily -- 18 A. Yes, that's correct. 19 Q. -- two things can happen at once? 20 A. Yes. 21 Q. Yes. If it happened as you were running round the rear 22 of the alpha car, between the arriving bravo car. 23 A. Yes. 24 Q. You would have had to allow for the car to stop, your 25 car, the alpha car, to stop, for you to get out of the</p> <p style="text-align: center;">Page 90</p>	<p>1 Q. You say in your statement: 2 "As I began to shout 'Armed police' I heard a crack 3 like ice breaking and a bang from a weapon being fired." 4 A. Yes, that's correct, sir. It was an unusual sound. And 5 I can't differentiate if like the ice breaking noise was 6 before or after the bang. I can't. It just seemed 7 an unusual sound. I knew it was a firearm, but a weird 8 noise with it. 9 Q. Did you realise it was a conventional weapon? 10 A. As opposed to what, a shotgun. 11 Q. A shotgun? 12 A. Yes. 13 Q. Again, you said it was seconds from when the shout of 14 "Armed police, show me your hands" went up that you 15 heard the crack and the bang. 16 A. Yes. 17 Q. Again, a similar order, three to five seconds? You tell 18 us. 19 A. It -- all this is in a couple of seconds. 20 Q. Did you hear one and only one shout of "Armed police, 21 show me your hands"? 22 A. That is all, yes, "Armed police, show me your hands", 23 that is all I have heard. 24 Q. When you heard the crack and the bang -- 25 A. Yes.</p> <p style="text-align: center;">Page 92</p>

<p>1 Q. -- you say that it was from a weapon being fired?</p> <p>2 A. Yes, that's correct.</p> <p>3 Q. You realised that it was from a weapon rather than</p> <p>4 a window being broken or something like that?</p> <p>5 A. Yes, that's correct, yes.</p> <p>6 Q. Did you appreciate that it was Q9 that was firing?</p> <p>7 A. I didn't have a clue at that point, sir.</p> <p>8 Q. If you heard someone shout, "Armed police, show me your</p> <p>9 hands" --</p> <p>10 A. Yes.</p> <p>11 Q. -- and then a few seconds later heard the sound of</p> <p>12 a weapon being fired --</p> <p>13 A. Yes.</p> <p>14 Q. -- had you carried on in your direction towards the</p> <p>15 nearside of the stolen Audi?</p> <p>16 A. Yes, I had.</p> <p>17 Q. If this was Q9 firing --</p> <p>18 A. Yes.</p> <p>19 Q. -- he would have been in close proximity to you then?</p> <p>20 A. He was still inside the vehicle and I would be going</p> <p>21 round the back, the boot area of the police Audi, yes.</p> <p>22 Q. Wouldn't you have moved on from around the back?</p> <p>23 A. Yes, I would have carried on from towards the nearside</p> <p>24 of the stolen red Audi.</p> <p>25 Q. You would be in a shortened space of open ground</p> <p style="text-align: center;">Page 93</p>	<p>1 a warning.</p> <p>2 Q. Not a warning beforehand, I am saying after you heard</p> <p>3 the shot fired?</p> <p>4 A. No, well, I don't recall from training that, you know,</p> <p>5 at that point you would shout, "I have fired", no.</p> <p>6 Q. But you do shout if you are on the receiving end of</p> <p>7 contact?</p> <p>8 A. Yes, that's correct, sir.</p> <p>9 Q. And the two phrases are?</p> <p>10 A. "Shots fired" or "Contact", yes.</p> <p>11 Q. Did you hear either of those shouted?</p> <p>12 A. No, I didn't, sir.</p> <p>13 Q. Having heard a weapon being fired, and not having heard</p> <p>14 either of those two phrases --</p> <p>15 A. Yes.</p> <p>16 Q. -- did you appreciate then, appreciating this is again</p> <p>17 within seconds, that this was likely to be a police</p> <p>18 officer that had fired?</p> <p>19 A. In them split seconds, no, sir.</p> <p>20 Q. Why was that?</p> <p>21 A. Because even on the range when you are training, some</p> <p>22 people just don't shout it, we shout "Contact" when</p> <p>23 targets turn, some people just get that focused on what</p> <p>24 they are doing, they don't shout it.</p> <p>25 Q. It is what should happen, but in the heat of the moment,</p> <p style="text-align: center;">Page 95</p>
<p>1 effectively between the rear of the police Audi and the</p> <p>2 stolen Audi's nearside front door?</p> <p>3 A. That's correct, sir, yes.</p> <p>4 Q. Q9 would have been, effectively, over your left</p> <p>5 shoulder?</p> <p>6 A. In that general direction, yes. Like I say I knew he</p> <p>7 was putting cover on, excuse me, but I don't know,</p> <p>8 I didn't look towards him.</p> <p>9 Q. Did you hear Q9 say anything after the sound of the</p> <p>10 weapon being fired?</p> <p>11 A. I didn't hear anything, no, sir.</p> <p>12 Q. In training is it normal to announce that you fired your</p> <p>13 weapon?</p> <p>14 A. Not -- it might be later on. I don't know. If we get</p> <p>15 shot at, we would shout "Contact", and I didn't hear</p> <p>16 "Contact".</p> <p>17 Q. That is what I was going to ask you. That is the</p> <p>18 converse, if you are being shot at?</p> <p>19 A. Yes, and, you know, we would shout "Shots fired".</p> <p>20 Q. So "Shots fired" or "Contact" if you are being shot at?</p> <p>21 A. Yes.</p> <p>22 Q. What about the other way round, if it is police officers</p> <p>23 doing the firing?</p> <p>24 A. If I had to take a shot of someone, and I would think it</p> <p>25 is life-critical situation, then I wouldn't be shouting</p> <p style="text-align: center;">Page 94</p>	<p>1 sometimes it is not done?</p> <p>2 A. Yes, that's correct, sir.</p> <p>3 Q. Were you in the position of having heard a weapon fired,</p> <p>4 you didn't know whether it was the subjects firing on</p> <p>5 police officers or a police officer firing on the</p> <p>6 subjects?</p> <p>7 A. At that moment in time I thought we were getting shot</p> <p>8 at.</p> <p>9 Q. Why did you think you were getting shot at?</p> <p>10 A. Because I just took that that we were getting shot at.</p> <p>11 Q. But why?</p> <p>12 A. I just presumed it, that is, you know, that it was we</p> <p>13 were getting shot at, that is all I can say.</p> <p>14 Q. Why did you presume?</p> <p>15 A. Because I had heard a firearm go off.</p> <p>16 Q. Okay, I will not pursue that any further.</p> <p>17 A. Yes.</p> <p>18 Q. In terms of the vehicle, the red Audi --</p> <p>19 A. Yes.</p> <p>20 Q. -- were there any obvious signs to you that the engine</p> <p>21 was running?</p> <p>22 A. I couldn't recall at that time, and I don't think I have</p> <p>23 put it in my statement but I think afterwards, when</p> <p>24 I was dealing with Mr Totton, I remember seeing the boot</p> <p>25 of the Audi slightly open and exhaust fumes.</p> <p style="text-align: center;">Page 96</p>

<p>1 Q. Well I think you are right. In all of your accounts you 2 don't say that, do you?</p> <p>3 A. About the car -- I mention the boot, don't I, but 4 I don't mention the engine, no, sir.</p> <p>5 Q. Right. 6 At any stage did you hear the engine running?</p> <p>7 A. After everything had calmed down, and I was dealing with 8 Totton, that is when I have just -- it was just idling, 9 it wasn't --</p> <p>10 Q. It wasn't revving?</p> <p>11 A. It wasn't revving, no, sir.</p> <p>12 Q. Before everything had calmed down, were there any signs 13 to you to you, obvious signs, that the engine was 14 running?</p> <p>15 A. I couldn't tell you, with our vehicles pulling up, 16 police vehicles, you know, coming to a halt, the engine 17 of our own vehicle I didn't pay much attention, sir.</p> <p>18 Q. Okay, so you cannot help us as to whether or not at that 19 stage there was smoke from the exhaust or?</p> <p>20 A. No, at that stage I couldn't, no.</p> <p>21 Q. Okay, or that it was the sound of the engine revving at 22 that stage?</p> <p>23 A. No, with our cars, I couldn't tell you, sir, no.</p> <p>24 Q. Okay. 25 Were the exterior lights of the Audi on?</p> <p style="text-align: center;">Page 97</p>	<p>1 no one on the other side, of the driver's side of the 2 Audi and my focus then has been turned towards 3 Mr Totton, who was already out of the vehicle.</p> <p>4 Q. You ran towards the nearside door. Did you see through 5 the nearside door window?</p> <p>6 A. No, I was focused on Mr Totton, who was at the side of 7 that door.</p> <p>8 Q. Where was Mr Totton?</p> <p>9 A. He was right near to the nearside driver's door, as if, 10 you know ... 11 I can't recall if the door was open or it was 12 closed. I couldn't tell you, I remember just seeing 13 Mr Totton at the nearside of the front passenger door.</p> <p>14 Q. What was his body position?</p> <p>15 A. He was facing away from me, and I could only remember 16 seeing his right hand at that point.</p> <p>17 THE CHAIRMAN: Can I just, I do apologise but if I don't ask 18 now I may not follow what comes next. 19 I've got a note of you saying there was no one on 20 the driver's side of the car.</p> <p>21 A. As I have come round the boot of the police Audi, I have 22 heard the crack -- through my respirator I have had 23 a quick look just to take in the whole picture, but my 24 focus has been mainly on Mr Totton and there was no one 25 on that side --</p> <p style="text-align: center;">Page 99</p>
<p>1 A. I can't recall, because I know we had our lights going 2 on as we went into the car park because I could clearly 3 see, like I say, the stolen red Audi at the top but I 4 can't recall if that vehicle had its lights on or not.</p> <p>5 Q. Were there any interior lights on the Audi on at this 6 time, that you noticed?</p> <p>7 A. I can't recall.</p> <p>8 Q. If you take out, please, bundle O1, at --</p> <p>9 A. Should I close the other one or keep it open?</p> <p>10 Q. Yes, please. I am trying to find a photograph with 11 numbering that you can actually see. 12 Yes, 382, please, which I think is some red printing 13 on a red car. 14 Do you have 382?</p> <p>15 A. The front of the stolen Audi with the bullet hole in the 16 windscreen?</p> <p>17 Q. Yes.</p> <p>18 A. Yes.</p> <p>19 Q. You went to the nearside front door of that Audi, yes?</p> <p>20 A. Yes, that's correct.</p> <p>21 Q. Did you see the bullet hole?</p> <p>22 A. No.</p> <p>23 Q. Did you look at the windscreen?</p> <p>24 A. I might have looked towards that direction but I have 25 not paid attention, all as I remember is there was</p> <p style="text-align: center;">Page 98</p>	<p>1 THE CHAIRMAN: No officer, you mean?</p> <p>2 A. No officer, no, sorry.</p> <p>3 THE CHAIRMAN: That is all right.</p> <p>4 MR BEER: The chairman is right to ask about it. 5 Could you see through the passenger window to see 6 whether the driver was in the car?</p> <p>7 A. It was just a quick -- just like that and then I focused 8 on Mr Totton and all I remember is I didn't see who was 9 sat in the front passenger seat or anything like that, 10 it was just a case of look that general direction, no 11 officers here and then I focused on Mr Totton.</p> <p>12 Q. Okay. You were describing for us Mr Totton's 13 orientation. You said he was facing away from you?</p> <p>14 A. Yes, he was facing away.</p> <p>15 Q. In what way was he facing away from you? Was he facing 16 the passenger's door or was he facing the grass?</p> <p>17 A. No, he was facing towards the rear of the vehicle with 18 that strip of little grass at the rear of the Audi.</p> <p>19 Q. You said that you could see his right hand, what was his 20 right hand doing?</p> <p>21 A. He just -- I think it was down somewhere like that, from 22 recollection. Or moving down, something like that. 23 (Indicates)</p> <p>24 THE CHAIRMAN: You are demonstrating with your arm somewhat 25 extended from shoulder level down, palm down.</p> <p style="text-align: center;">Page 100</p>

<p>1 A. Yes, because as I was shouting, I have shouted towards 2 him and then you know he has been going down. 3 MR BEER: Could you see his left hand? 4 A. Not at that time, no, sir. 5 Q. Were you concerned that you could not see his left hand? 6 A. Yes, just after hearing a shot as well, I was, sir. 7 Q. Did you think that he might have a gun? 8 A. Yes. 9 Q. Did you shoot him? 10 A. No, I didn't, sir. 11 Q. Why not? 12 A. Because at that time he was facing away from me and 13 I couldn't see what he had in his hand. His right hand 14 was clear, I couldn't see his left hand. 15 Q. You had heard a shot, you thought that the subjects or 16 one of them had fired at police officers? 17 A. Yes. 18 Q. There was a man out of the car? 19 A. Yes. 20 Q. You couldn't see his left hand? 21 A. That's correct, sir. 22 Q. You thought he had a gun? 23 A. He could have, it could have been someone else in the 24 vehicle, I don't know, sir. 25 Q. But why didn't you shoot him?</p> <p style="text-align: center;">Page 101</p>	<p>1 windscreen -- 2 A. Yes, sir. 3 Q. -- could you see whether he was in the car or not? 4 A. As I am driving -- as I am looking at where the Audi is 5 or when I've got out of the vehicle? 6 Q. No, when you were sitting in the rear of the alpha 7 vehicle, looking at the Audi, could you see Mr Totton in 8 the front passenger seat? 9 A. I could only see where the car was in the car park and 10 the actual, you know, where the hedge was and that was 11 it. 12 Q. Did you at any stage see Mr Totton get out of the front 13 passenger seat of the Audi? 14 A. No, sir, I didn't. 15 Q. It was just by the time you had rounded the rear of the 16 alpha vehicle, he was out? 17 A. Yes, that's correct. 18 Q. Were you aware of any other officers at this time? 19 A. I heard other colleagues coming up then, yes and then 20 I think I was joined by other colleagues. 21 Q. Which other colleagues? 22 A. Let me just move this out of the way. 23 Q. Yes. 24 A. Yes: 25 "He is laying on the floor near to the Audi, I saw</p> <p style="text-align: center;">Page 103</p>
<p>1 A. Because he was facing away from me and posing me no 2 threat at that time, sir. 3 Q. Even though his left hand was not visible to you? 4 A. No, it was not visible at that time. If I had seen 5 a firearm in that hand then he would have been shot. 6 Q. You would not fire just because you couldn't see 7 a subject's hand? 8 A. No. 9 Q. You would want to wait to see what was in the hand? 10 A. Yes, if he did a sudden movement, you know, made move to 11 his coat, went to turn towards me, it might be 12 different. 13 Q. Did you shout, "Armed police, show me your hands"? 14 A. Yes, I did. 15 Q. Did he lay down immediately on the floor face down? 16 A. Yes, he was, he was going down to lie on the floor. 17 Q. Did you, when he was on the floor, run over to him, 18 place your knee on his back to stop him getting up? 19 A. That's correct, sir, yes. 20 Q. Before you came across Mr Totton facing away from you, 21 in the position that you have described, did you see him 22 get out of the car? 23 A. No, I didn't, sir. 24 Q. When you first arrived at the scene, when you were 25 sitting in the car, and you took the quick look at the</p> <p style="text-align: center;">Page 102</p>	<p>1 his right hand was empty facing down. Ran over, placed 2 my knee on him to stop him getting up and then saw his 3 other hand as it has gone on the floor ..." 4 So it has come out as he has gone down: 5 "Then I have heard the smashing of glass, other 6 colleagues arriving shouting 'Armed police' ..." 7 And then I got tapped on my shoulder, which is 8 either a signal that you have got support there or move 9 on, and I have moved forward to allow officers to get at 10 the vehicle, because we were at the side near to the 11 doors that they would have wanted to get access to. 12 Q. Where was Mr Totton at this point on the floor before 13 you moved him? 14 A. He was on the floor and I would say he would be laid 15 down near to the rear nearside door. 16 Q. What was his orientation, which way was his head 17 pointing? 18 A. I can't recall. I think it was either down or facing 19 away from the stolen Audi. 20 Q. Was he laying parallel to the Audi with his head 21 pointing towards the grass? 22 A. Yes, that's correct, sir, yes. 23 Q. Yes? 24 A. Yes. 25 Q. Was his head near the rear nearside door?</p> <p style="text-align: center;">Page 104</p>

<p>1 A. Yes, or near the rear tyre -- you know, tyre to the 2 right. 3 Q. Near the rear tyre? 4 A. Yes, along them lines. 5 Q. You heard glass breaking? 6 A. Yes, that's correct. 7 Q. And you say another officer shouting "Armed police"? 8 A. Yes. 9 Q. Did it happen in that order, glass then "Armed police" 10 or were they at the same time or was it "Armed police" 11 before the glass breaking? 12 A. I can't recall, to tell you the truth. I can't recall. 13 Q. You say that you were tapped on your shoulder and joined 14 by X9, yes, and then X9 cuffed him? 15 A. Later on, yes, he cuffed him. I covered the male as my 16 colleague handcuffed him. 17 Q. You saw that Mr Totton was wearing black gloves that had 18 knuckle protectors in them? 19 A. Yes, I described them as "tactical gloves". They looked 20 better than the ones we get issued. 21 Q. You also heard a shotgun being fired and your colleagues 22 shouting "Armed police, show me your hands"? 23 A. Yes, that's correct. 24 Q. How many times did you hear the shotgun fired? 25 A. I recall two. Two?</p> <p style="text-align: center;">Page 105</p>	<p>1 MR BEER: Sir, if it helps I have about 5 or 10 minutes to 2 go and then other core participants will ask their 3 questions of W9 before we move to Q9. 4 THE CHAIRMAN: Thank you. 5 A. Should I leave all these? 6 (1.02 pm) 7 (The Luncheon Adjournment) 8 (2.15 pm) 9 THE CHAIRMAN: Yes, Mr Beer. 10 MR BEER: W9, just a few more questions from me please. 11 I think we had reached the stage where the shotgun 12 had been discharged for the second time, deflating the 13 rear nearside tyre of the Audi, whilst Mr Totton was 14 laying on the ground with you and your colleague X9 15 holding him or covering him? 16 A. Yes, that's correct, sir. 17 Q. At this point was Mr Totton identified by you by asking 18 him his name and age? 19 A. Yes, he was, sir. 20 Q. Did you then arrest and caution Mr Totton? 21 A. I did, yes. 22 Q. Did he make no reply to the caution? 23 A. That's correct. 24 Q. Did you then see Mr Grainger laying on his back at the 25 side of the Audi?</p> <p style="text-align: center;">Page 107</p>
<p>1 Q. Did you see the shotgun being fired? 2 A. No, I was aware of it when the rear nearside tyre got 3 done, because we were stood near the -- just off to the 4 right of that with Mr Totton. I think we were -- it was 5 roughly the time maybe he was getting handcuffed. 6 Q. Was that before Mr Totton had been moved? If you look 7 at page 3 of your statement, you say in the second 8 paragraph: 9 "During this I heard the shotgun being fired ... and 10 then I along with X9 moved the male." 11 A. Yes, then we moved him. 12 Q. He was still on the floor? 13 A. To the right. 14 Q. Of the rear tyre, when -- 15 A. Yes, we were there. I was covering from the head and 16 I think -- 17 Q. X9? 18 A. X9 was handcuffing him and then the tyres, whoever has 19 come and done the shotgun -- bear with me, sorry -- Z15 20 has then come up and done the tyre. 21 MR BEER: Sir, might that be a convenient moment? 22 THE CHAIRMAN: Yes, thank you. 23 We will resume at 2.05. 24 Hang on there a second, please. 25 A. Yes, sir.</p> <p style="text-align: center;">Page 106</p>	<p>1 A. We had moved Mr Totton to the grass and that is when 2 I have looked over to the side of the red Audi and 3 I have saw the male I now know to be Anthony Grainger at 4 the side laying on his back. 5 Q. Were officers administering first aid? 6 A. Yes, there was colleagues trying to save his life. 7 Q. Was that the first time that you heard that Mr Grainger 8 had been injured or had you heard a shout go up earlier? 9 A. I can't recall if I heard someone had shouted "He has 10 been shot" -- oh, sorry, it is there, "He has been shot, 11 he has been shot", and it was not until he was removed 12 from the vehicle that I was aware that it was him that 13 had been shot. 14 Q. I see. 15 Did you yourself administer any first aid or was 16 that done by other officers? 17 A. That was done by other officers; I stayed with 18 Mr Totton. 19 Q. Was he subsequently escorted away from the scene in 20 a police van? 21 A. Yes, myself and a colleague, W4, later escorted him to 22 a marked police van, I think it might have been 23 a Cheshire Police van that turned up. 24 Q. Before he was escorted away, were any photographs taken 25 of him?</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

1 **A. Not that I recall, no.**
 2 Q. If you just take out the O bundle, please. I am looking
 3 at page 279, please.
 4 Yes, the photograph bundle.
 5 279, yes. (Pause)
 6 **A. The back of a male in a grey tracksuit, handcuffed with**
 7 **gloves?**
 8 Q. Yes. Then if you look at 280, please.
 9 **A. Yes.**
 10 Q. Can you see that? Is that Mr Totton?
 11 **A. I can't recall from this, from that picture there, no.**
 12 Q. Sorry?
 13 **A. I can't make out from that picture there, no.**
 14 Q. If you go to 249, please, to 251. Do you have that?
 15 249 to 251, and there is a face shot at 250. Is that
 16 Mr Totton?
 17 **A. I believe it is, yes, sir.**
 18 Q. Equally, if you just flick back a little bit, at 246 to
 19 248, is that Mr Travers?
 20 **A. I wouldn't know, I didn't have any dealings with him on**
 21 **the night, sir.**
 22 Q. Who took the photographs of these two men sitting at the
 23 scene?
 24 **A. I don't recall. It might be a surveillance operative.**
 25 **Sometimes that used to be -- used to happen, after**

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1 **a strike surveillance would come forward and take images**
 2 **of the subjects near to the vehicle. So it couldn't be**
 3 **conspired that we had, you know, planted balaclavas or**
 4 **gloves on them.**
 5 Q. Do you know why any photographs were not, as it seems,
 6 taken of other matters, other than the subjects? These
 7 two subjects?
 8 **A. No, I can't recall. I don't know why it wasn't.**
 9 Q. Did you have a camera in your car at the scene?
 10 **A. No. We don't carry any evidential equipment in the**
 11 **police firearms vehicles. We will carry trauma kits,**
 12 **shields, stuff like that but no evidence equipment, you**
 13 **know, bags, gloves, stuff like that, no.**
 14 Q. No still or video cameras?
 15 **A. No.**
 16 Q. Do you know where the still camera came from that took
 17 these pictures then?
 18 **A. Like I say, I can only presume it is a member of the**
 19 **surveillance unit.**
 20 Q. Thank you, you can put that bundle away, please.
 21 One last question. You recall I asked you about the
 22 process of taking your witness statement on 9 March, at
 23 Nexus House?
 24 **A. Yes, sir.**
 25 Q. Which was a Friday.

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1 Do you remember attending a meeting the day before
 2 then on 8 March, the Thursday?
 3 **A. I can't recall, sir. I know we had meetings, we had**
 4 **phone calls when we were at home about, you know,**
 5 **welfare phone calls, stuff, you know, calls various**
 6 **things happening and I just can't make details --**
 7 Q. I am just seeing whether I can jog your memory.
 8 **A. Yes.**
 9 Q. A meeting attended by a man called Mark Williams.
 10 **A. He would be the PFOA gentleman, yes.**
 11 Q. The Police Firearms Officers' Association?
 12 **A. Yes.**
 13 Q. Then I think a Metropolitan Police officer; is that
 14 right?
 15 **A. Yes, that's correct, yes.**
 16 Q. Attending with somebody from CO19, the Met firearms
 17 branch, called Michael Burke, do you remember that?
 18 **A. I don't remember him, sir, no.**
 19 Q. What about this, a person who we only know as V53 -- you
 20 will not find him on there -- the man that shot
 21 Mark Duggan?
 22 **A. I remember him coming up to Manchester. I couldn't**
 23 **recall if it was that date you have said, but I do**
 24 **remember, yes I do recall him coming up.**
 25 Q. Right, do you remember the man that shot Mark Duggan

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1 coming to Manchester with Mr Burke and Mr Williams?
 2 **A. I remember him coming with Mr Williams, the PFOA man,**
 3 **yes.**
 4 Q. Right. We have a witness statement from Mr Williams
 5 about that meeting and he says that it was on the
 6 Thursday, 8 March.
 7 **A. Yes.**
 8 Q. So before you made your first account, yes?
 9 **A. That would be correct, yes. Like I say, I can't recall**
 10 **that.**
 11 Q. Do you remember what the purpose of the man from the
 12 PFOA bringing the man that shot Mark Duggan up to see
 13 you was?
 14 **A. Because they had been through similar circumstances down**
 15 **in there, police shootings are -- very fortunate they**
 16 **are very rare in this country, aren't they, and it is**
 17 **just the offer -- the support that the PFOA offer, you**
 18 **know, welfare and obviously my colleague that has had to**
 19 **fire his weapon, the effect it is going to have on him**
 20 **and his family and, you know, it is not taken lightly,**
 21 **is it. So they brought him up to share that gentleman's**
 22 **experience, I would imagine.**
 23 Q. Can you remember what happened in the course of the
 24 meeting?
 25 **A. Not in detail, no. I just remember him coming up and**

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1 **just, you know, went through -- he might have mentioned**
 2 **what happened through the PIP procedure with him.**
 3 **I can't recall in detail, no, sir.**
 4 Q. Can you remember whether anything was said about the
 5 fact that a number of you had not made a written account
 6 by that stage and it was now five days on from the
 7 death?
 8 **A. I can't recall that. I know there was concerns of**
 9 **a couple of us, you know, that we wanted to get our**
 10 **statements done but I can't remember anything -- it was**
 11 **when the PFOA gentleman came up.**
 12 Q. Do you recall Q9 going off for a private meeting with
 13 V53, the man that shot Mark Duggan?
 14 **A. I can't recall that, no. I know he has had meetings**
 15 **with his own legal representatives, I don't remember**
 16 **that. We were all in a room at Openshaw when**
 17 **Mr Williams and V15 came up.**
 18 Q. V53.
 19 **A. Sorry, V53.**
 20 MR BEER: Yes, thank you very much.
 21 Those are the questions that I ask.
 22 THE CHAIRMAN: Mr Thomas, do you have some questions?
 23 MR THOMAS: Yes, sir. I do.
 24
 25

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1 Questions from MR THOMAS
 2 MR THOMAS: W9, let me introduce myself. Mr Thomas,
 3 I represent Anthony's family, okay?
 4 **A. Yes.**
 5 Q. Can we just start with this. Just remind us, how long
 6 had you been in the Firearms Unit?
 7 **A. I joined firearms in 2000.**
 8 Q. So 12 years at the time of this incident?
 9 **A. That's correct, yes.**
 10 Q. It would be fair to say you wouldn't describe yourself
 11 as green -- you understand what I mean by green?
 12 **A. Yes, I understand you, sir.**
 13 Q. Yes. In your 12 years' service as a firearms officer,
 14 was this the first fatality?
 15 **A. Yes, I have been in post-incident before but it is the**
 16 **first fatality I have been involved in, yes, sir.**
 17 Q. Right, so for that reason of itself, that would make
 18 this very memorable, wouldn't it?
 19 **A. Unusual. Like over time, five years has gone since**
 20 **then, so, you know, I can only remember so much.**
 21 Q. Tell us this, you had been in firearms for 12 years and
 22 the police force for how many years?
 23 **A. 1994.**
 24 Q. Right.
 25 **A. 18 years at the time.**

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1 Q. Yes. Nearly two decades in the police force?
 2 **A. That's correct, yes.**
 3 Q. You know from your nearly two decades in the police
 4 force of the importance of police officers' accounts,
 5 evidence gathering, that sort of thing?
 6 **A. Yes, I am aware of that, sir, yes.**
 7 Q. Yes.
 8 Just help me with this. None of you, none of the
 9 firearms officers had done their first full statements
 10 by 8 March, okay?
 11 **A. Yes --**
 12 Q. You certainly hadn't?
 13 **A. No, I had done an arrest statement on the 7th and that**
 14 **was all I had done.**
 15 Q. But all the arrest statement said was, "I arrested
 16 Totton" and you gave the reasons why you arrested him?
 17 **A. Yes, that's correct.**
 18 Q. That is not a statement in relation to what happened?
 19 **A. No, I am not disputing that though.**
 20 Q. No, so let me put this to you.
 21 Bearing in mind that you know about the importance
 22 of contaminating evidence, being influenced by others,
 23 yes?
 24 **A. Yes, that's correct.**
 25 Q. None of this is new to you --

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1 **A. No.**
 2 Q. -- correct?
 3 **A. No.**
 4 Q. Did you not think to yourself, when V53, the man who
 5 shot Mark Duggan, came up to Manchester and came into
 6 a meeting with all the firearms officers in this case,
 7 did you not think, "Good grief, that is a bit odd"?
 8 **A. No, because we had not been in that situation before and**
 9 **like I say it is a traumatic situation for my colleague**
 10 **wasn't it, as well.**
 11 Q. Help me with this: did you question it?
 12 **A. Did I question it?**
 13 Q. Yes, did you question it?
 14 **A. No, I was a PC. No, I didn't.**
 15 Q. You say as a PC, as a police officer with some nearly
 16 two decades' experience?
 17 **A. Yes, but someone higher up than me, who would have**
 18 **arranged the meeting, wouldn't they.**
 19 Q. Okay, but that doesn't mean you don't have a tongue in
 20 your head and you cannot question things?
 21 **A. No, that's correct. Like I can speak now.**
 22 Q. Let me just push this a little bit further.
 23 There you are, remembering none of you have given
 24 your full accounts yet?
 25 **A. Yes, that's correct.**

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1 Q. All right? You are in the meeting, and this is
 2 8 March 2012, this is some two years or nearly two years
 3 before the inquest in Mark Duggan so V53, his evidence
 4 has not been tested?
 5 **A. Yes.**
 6 Q. Help us, this was the first police shooting fatality you
 7 had been involved in?
 8 **A. Yes.**
 9 Q. What was being discussed with V53, tell us?
 10 **A. Welfare and PIP stuff, not what we were to put on**
 11 **a statement.**
 12 Q. Welfare and PIP stuff, post-incident procedure?
 13 **A. Yes, as in what happened to him.**
 14 Q. Well, hang on a second. Let's just examine that.
 15 **A. Yes.**
 16 Q. His evidence had yet to be tested.
 17 **A. I wouldn't know, I don't know, you know.**
 18 Q. The Mark Duggan Inquest had not taken place.
 19 **A. I know it was around the same year.**
 20 Q. No, it wasn't the same year. Forgive me.
 21 **A. Oh right, well there you go then.**
 22 Q. Let me tell you when it was, the Mark Duggan Inquest
 23 took place between September 2013 and January 2014 when
 24 it concluded.
 25 **A. Right.**

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1 Q. We are now in March 2012. He is discussing with you the
 2 post-incident procedure, which is important, isn't it?
 3 **A. Yes.**
 4 Q. Because that is the procedure -- let's be clear about
 5 this -- which is examined to see whether officers
 6 confer, put their heads together, how their witness
 7 statements are taken?
 8 **A. That's correct, yes.**
 9 Q. He is giving you advice, is he? Before you have done
 10 your first accounts?
 11 **A. He is saying what has happened to him. He is not giving**
 12 **us -- or he weren't giving me advice, he didn't tell me**
 13 **what to put in my statement.**
 14 Q. And including the shooter in this case, Q9. Yes?
 15 **A. My colleague, yes.**
 16 Q. There was, was there not, concern expressed that none of
 17 you had done your first accounts, or your first full
 18 accounts? That concern was being expressed, do you
 19 remember Mark Williams expressing concerns about that?
 20 **A. He might have mentioned it to the supervisor. I can't**
 21 **remember or recall all the meeting.**
 22 Q. Tell me this, when concerns were expressed, when it was
 23 learnt that you hadn't given your first full accounts,
 24 did somebody have the bright idea to think, "Hang on
 25 a second, maybe this meeting shouldn't go ahead"?

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1 **A. I wouldn't know. I think a supervisor will have**
 2 **arranged the meeting so they would have spoke where we**
 3 **were up to with our statements.**
 4 Q. How long did the meeting last for, tell us?
 5 **A. I haven't got a clue, it is that long ago.**
 6 Q. Come on, try, how long roughly do you think you were
 7 there for, five minutes?
 8 **A. I don't know, half an hour? Half an hour?**
 9 Q. New topic, can we see if we can agree on one or two
 10 things.
 11 You have told us that you believe that as your
 12 vehicle, the alpha vehicle, was approaching the car
 13 park, about to go in on this strike --
 14 **A. Yes.**
 15 Q. -- that there was discussions amongst you and your
 16 colleagues about the plan as to roughly who would go
 17 where --
 18 **A. Yes.**
 19 Q. -- on deployment, correct?
 20 **A. Yes, where alpha would go and where bravo would go.**
 21 **Yes, that's correct.**
 22 Q. You say that this plan was communicated you believe over
 23 the radio?
 24 **A. I believe so, yes.**
 25 Q. Because one thing I would like you to try to help us

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1 with, as you stand there today --
 2 **A. Yes.**
 3 Q. -- the firearms officers that we have had in the same
 4 place, from the bravo car and the charlie car, they have
 5 all said there was no plan.
 6 **A. Well --**
 7 Q. Every single one of them. Are you sure this plan was
 8 communicated?
 9 **A. I am positive. But whether -- you would have to ask Q7,**
 10 **because he is the one that operated his radio --**
 11 THE CHAIRMAN: Do you mean X7?
 12 **A. X7, sorry, who is operating his radio, isn't he. I am**
 13 **sat in back.**
 14 MR THOMAS: May I suggest this, there was no plan
 15 communicated over any radio. That is the reason why
 16 nobody in the bravo car and nobody in the charlie car
 17 knew what the plan was.
 18 **A. That is not what I understand, no.**
 19 Q. Tell me this. It was your belief, was it, that there
 20 were or there was a likelihood that there were going to
 21 be firearms discovered on this strike? That is what you
 22 had been told at the briefing, there was a possibility
 23 that these were armed and dangerous men, correct?
 24 **A. Armed or otherwise so dangerous, yes.**
 25 Q. You had in your mind the possibility of firearms,

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1 correct?
 2 **A. That's correct, yes.**
 3 Q. Indeed you have already told us, in your evidence to
 4 Mr Beer this morning, that there was a point in this
 5 incident where you saw Mr Totton on the ground and you
 6 thought he may have had a firearm?
 7 **A. Yes.**
 8 Q. Indeed, at some point in the evening, you realised that
 9 a man had tragically died as a result of being shot by
 10 one of your colleagues?
 11 **A. That's correct, yes.**
 12 Q. So where were the guns?
 13 **A. We didn't find any guns.**
 14 Q. No. Guns were looked for, weren't they, that night and
 15 none were found. That's correct, isn't it?
 16 **A. I would imagine a cursory search of the vehicle would**
 17 **have took place, yes.**
 18 Q. Right.
 19 Just help me with this. Do you remember the
 20 photographs that Mr Beer just took you to --
 21 **A. Yes.**
 22 Q. -- of Mr Rimmer and Mr Totton --
 23 **A. Yes.**
 24 Q. -- wearing what they had on?
 25 THE CHAIRMAN: Do you mean Mr Travers?

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1 MR THOMAS: Sorry, Travers, I said "Rimmer", didn't I.
 2 Yes, Mr Travers and Mr Totton.
 3 **A. Yes, I do. It was only a few minutes ago.**
 4 Q. Those photos were taken for evidential purposes; weren't
 5 they?
 6 **A. Yes.**
 7 Q. It would be a natural thing, would it not, at the scene,
 8 for you and your colleagues to be -- one of the first
 9 things you would be looking for would be the guns, the
 10 firearms?
 11 **A. Yes. The first threat is the person, isn't it.**
 12 Q. Once you have the people under control --
 13 **A. Yes.**
 14 Q. -- you would be looking --
 15 **A. As firearms officers we would not tear the car apart**
 16 **looking for a firearm, that is not what we do.**
 17 Q. Forgive me, I didn't say "tear the car apart", but you
 18 would be looking -- so for instance if we hear, "Well,
 19 I believed he was reaching for a gun".
 20 **A. Yes.**
 21 Q. You know, you don't need to tear a car apart to look to
 22 see whether there is a gun below, underneath the seat or
 23 in the boot or --
 24 **A. That's correct, sir.**
 25 Q. -- in the footwell, do you follow?

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1 **A. Yes, that's correct.**
 2 Q. That is the sort of thing that you and your colleagues
 3 would look for?
 4 **A. Yes.**
 5 Q. Yes.
 6 It would be a nonsense wouldn't it to suggest,
 7 "Well, it is not something that we would be concerned
 8 about or we wouldn't look for", or, indeed, "I have no
 9 idea whether there were any guns in that car until
 10 several days later". All of you knew there were no guns
 11 in the car on the night?
 12 **A. On the cursory search -- from word got round that there**
 13 **were no weapons in the car that night. I wouldn't say**
 14 **that everyone was aware. I was aware.**
 15 **We got split up at certain points after the**
 16 **incident, and I know --**
 17 Q. Moving on, new topic.
 18 THE CHAIRMAN: I think he is --
 19 **A. I know Q9 got separated and put in a vehicle on his own**
 20 **after the incident.**
 21 MR THOMAS: All right.
 22 New topic.
 23 **A. Can I just say, there was no one more shocked than me**
 24 **that we didn't find firearms in the car. I thought, and**
 25 **even when I got phoned up two days later at home as**

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1 **a welfare check, I even mentioned to one of the PIP**
 2 **officers, Chief Inspector Hughes, that at the back of**
 3 **the vehicle, had it been searched the takeaway bins and**
 4 **also there was mention of them coming out of some hedges**
 5 **there, you know, or was there a second car because you**
 6 **know, from previous experience, you know, there could be**
 7 **another car nearby or --**
 8 Q. And no guns?
 9 **A. No gun was found, no. No.**
 10 Q. No.
 11 Moving on. You -- when I say "you" am talking about
 12 you the AFO officers, the firearms officers. On your
 13 way to this deployment it would have been really
 14 important for you to be listening and taking the
 15 information on board from your eyes on the ground, the
 16 surveillance officers --
 17 **A. Yes.**
 18 Q. -- agreed?
 19 **A. Yes.**
 20 Q. All of you, when I say "all of you", the firearms
 21 officers --
 22 **A. Yes.**
 23 Q. -- in your three cars, or four cars I think, there was
 24 a delta car as well?
 25 **A. Yes, four cars.**

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1 Q. Would have been listening to that channel in relation to
 2 what the surveillance officers, the eyes on the ground,
 3 would have been saying in relation to what they could
 4 see?
 5 **A. That's correct, yes.**
 6 Q. That would have been really important, because that
 7 would affect how you deploy on the strike?
 8 **A. It would have some bearing on how you deploy on the**
 9 **strike, yes, as long as what you see as you are rolling**
 10 **up.**
 11 Q. It came through on the radio when the car set off, it
 12 came through on the radio when the stolen Audi set off.
 13 **A. Set off from where, sir?**
 14 Q. From where the operation started that evening.
 15 **A. It is that long ago, I can't recall where -- all this**
 16 **would be recorded on a surveillance log, so for me to**
 17 **remember all this, and all the chatter that goes on**
 18 **a surveillance log would be -- unless I am doing**
 19 **shorthand in the back of a police car, it is all down on**
 20 **a surveillance log. I would particularly take note.**
 21 Q. Let me see if I can help with one or two specifics.
 22 **A. Okay.**
 23 Q. You would have been told who the driver was?
 24 **A. Yes, that's correct.**
 25 Q. Right, and you would have been told and the whole car

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1 would have known that the driver was Anthony Grainger.
 2 **A. Yes.**
 3 Q. You didn't know who the third man was who was in the
 4 rear of the car?
 5 **A. No, I didn't, sir.**
 6 Q. No. He was an unknown.
 7 **A. Yes, sir.**
 8 Q. You would have been told that the passenger was
 9 Mr Totton.
 10 **A. I don't doubt that, sir, no.**
 11 Q. Indeed, out of all the men, because you have an unknown,
 12 you have Mr Grainger and you have Mr Totton, Totton was
 13 the one who was the biggest risk, because of his
 14 history, correct?
 15 **A. He was certainly the most well known out of the team,**
 16 **yes.**
 17 Q. It is more than that. Come on, officer. In terms of
 18 dangerousness, Mr Totton was the biggest risk?
 19 **A. We deal -- everyone is a risk, aren't they, when we are**
 20 **approaching a vehicle. They are dealt with on their**
 21 **merits.**
 22 Q. Yes, I understand that, but in terms of risk assessment
 23 Mr Totton was the most dangerous person in terms of his
 24 history in that vehicle, so far as you knew?
 25 Are you disputing that?

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1 **A. No, I am not disputing it. He is a dangerous**
 2 **individual.**
 3 Q. Can you answer the question then? Was Mr Totton the
 4 most dangerous person, from the intelligence you had, in
 5 the vehicle? It is a yes or no, what is your answer?
 6 **A. It all depends on the actions, as I was saying. You**
 7 **could have got there and a number of variables could**
 8 **have been happening.**
 9 Q. W9, I am going to ask you it one last time. You can
 10 dodge it, avoid it --
 11 **A. Yes.**
 12 Q. -- but it is a simple question.
 13 **A. Yes.**
 14 Q. In terms of the criminal intelligence and history you
 15 had been provided with, was Mr Totton the most dangerous
 16 person in that vehicle? It is a yes or no.
 17 **A. He is the most known, but I can't say he is the most**
 18 **dangerous.**
 19 Q. Known for what? Known for what?
 20 **A. For violence.**
 21 Q. He would have been somebody on approaching the vehicle
 22 you would have been very concerned about, where he was,
 23 what he was doing, and all the rest of it?
 24 **A. No more so than anyone else in that vehicle.**
 25 Q. Help me with this. When you in the alpha vehicle deploy

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1 on the stop, where your vehicle blocks in the stolen red
 2 Audi --
 3 **A. Yes, that's correct.**
 4 Q. -- you get out and I think you say you get out when the
 5 vehicle stopped, correct?
 6 **A. Yes.**
 7 Q. If X7, if it is his evidence that he got out when the
 8 vehicle was still moving, he would have got out the
 9 vehicle before you?
 10 **A. If you had have listened to the evidence I said before,**
 11 **the bonnet of our Audi was near some hedges and it is**
 12 **tight to get through there and that would have slowed us**
 13 **down, that is why I went round the rear of the Audi.**
 14 Q. Sorry, that's not -- bear with me, let me repeat the
 15 question. I am not talking about hedges or bonnets, it
 16 is a simple question. You have told us, and you have
 17 just confirmed, that you got out of your Audi when your
 18 vehicle stopped.
 19 **A. Or when it was stopping, whatever it says in the**
 20 **statement.**
 21 Q. What I have put to you is, very simple, if X7's evidence
 22 is he gets out the vehicle when the vehicle is still
 23 moving --
 24 **A. Yes.**
 25 Q. -- it would mean that he got out of the vehicle before

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<p>1 you?</p> <p>2 A. He could have done, yes.</p> <p>3 Q. Thank you.</p> <p>4 New topic.</p> <p>5 A. I just don't get the point --</p> <p>6 Q. Don't worry.</p> <p>7 A. -- what order he got out of the vehicle for, what</p> <p>8 difference does that make?</p> <p>9 Q. Don't worry.</p> <p>10 A. Oh right.</p> <p>11 Q. I just want to know what your evidence is, and you have</p> <p>12 clarified it.</p> <p>13 A. Oh right, sorry.</p> <p>14 Q. New topic.</p> <p>15 What you see and what you don't see.</p> <p>16 A. Yes.</p> <p>17 Q. You have told us that you don't see Q9 or what Q9 is</p> <p>18 doing?</p> <p>19 A. No.</p> <p>20 Q. But we know Q9 is there.</p> <p>21 A. Yes.</p> <p>22 Q. The reason why you don't see Q9 is because when you</p> <p>23 deploy from the police Audi, you are concentrating on</p> <p>24 getting across to the stolen Audi and covering,</p> <p>25 certainly covering that side, which is the nearside, the</p> <p style="text-align: center;">Page 129</p>	<p>1 A. I can't see the back of the car. I can see the front of</p> <p>2 the stolen red Audi as we are driving and I see the</p> <p>3 hedge.</p> <p>4 Q. Can I put the question?</p> <p>5 A. Yes.</p> <p>6 Q. When you pull up and you are approaching the red Audi --</p> <p>7 A. Yes.</p> <p>8 Q. -- you don't know that anybody is out of car. Is that</p> <p>9 correct?</p> <p>10 A. Until I get round the end of the Audi --</p> <p>11 Q. I am not talking about until you get round --</p> <p>12 A. Until I can see that side of the vehicle, no, I don't</p> <p>13 know anyone is out of vehicle, no.</p> <p>14 Q. Right, before you leave your car, you believe people are</p> <p>15 still in the car. Correct?</p> <p>16 A. Yes.</p> <p>17 Q. Right. From what you have been told earlier on, there</p> <p>18 was nothing that had changed from where the driver was</p> <p>19 and where Mr Totton was, correct?</p> <p>20 A. Not that I can recall, no.</p> <p>21 Q. No.</p> <p>22 In your mind, your concentration would have been --</p> <p>23 using your words not mine --</p> <p>24 A. Yes.</p> <p>25 Q. -- concentrating on the most known person in that car,</p> <p style="text-align: center;">Page 131</p>
<p>1 passenger side, of the stolen Audi. Correct?</p> <p>2 A. That's correct, sir, yes.</p> <p>3 Q. That is where all of your attention is, because we know</p> <p>4 on the nearside passenger side, the person with the most</p> <p>5 dangerous history is Mr Totton. Correct?</p> <p>6 THE CHAIRMAN: He has said -- we don't want to go through</p> <p>7 all this again. He has said he was the most known for</p> <p>8 violence. You are putting something slightly different.</p> <p>9 There is no need to go through all that again.</p> <p>10 MR THOMAS: The most known.</p> <p>11 In any event, the simple point I am putting to you</p> <p>12 is you were going towards where Mr Totton was said to be</p> <p>13 from your eyes on the ground?</p> <p>14 A. I don't know who was where. From what -- Mr Totton was</p> <p>15 out of the car, when I struck. I didn't see anyone get</p> <p>16 out of the car, with the boot being open afterwards, and</p> <p>17 I even said at the time it might be worthwhile looking</p> <p>18 at the boot, because the boot was slightly open, so</p> <p>19 I don't know if he had come from the back of the car but</p> <p>20 he was outside the car when I have struck.</p> <p>21 Q. When you pull up --</p> <p>22 A. Yes.</p> <p>23 Q. As you were pulling up, as you were deploying the</p> <p>24 strike, you don't know that anybody is out of car,</p> <p>25 correct?</p> <p style="text-align: center;">Page 130</p>	<p>1 Totton?</p> <p>2 A. I didn't say "Concentrating on the most known person on</p> <p>3 the car", can you check if I have said that?</p> <p>4 Q. You would have been going towards the most known person</p> <p>5 in the car, and I am suggesting you would have been</p> <p>6 concentrating on him?</p> <p>7 A. I was just concentrating on going to that side of the</p> <p>8 car and dealing with what I saw.</p> <p>9 Q. Where the most known person was.</p> <p>10 A. I don't know -- balaclavas on top of their head, I don't</p> <p>11 know who was who. It took me a while looking at the</p> <p>12 photograph who was who. So how am I to know then.</p> <p>13 Q. You don't see -- still concentrating on what you don't</p> <p>14 see --</p> <p>15 A. Yes.</p> <p>16 Q. You didn't see when X7 deployed, because you were</p> <p>17 concentrating on your side, correct?</p> <p>18 A. Yes, that's correct. He could have got out of the car</p> <p>19 before me.</p> <p>20 Q. You don't see the torch from Q9's weapon?</p> <p>21 A. The vehicle -- with the bravo vehicles turning up, I</p> <p>22 can't recall TAC lights, no. There might have been some</p> <p>23 on, there might not.</p> <p>24 Q. There is no suggestion in your witness statement, is</p> <p>25 there?</p> <p style="text-align: center;">Page 132</p>

1 **A. I have not put it in, no, so no.**
 2 Q. In fact, let's come on to Mr Totton now. You don't see
 3 Mr Totton exit that vehicle?
 4 **A. That's correct, yes.**
 5 Q. The front passenger door, when you got there was it
 6 opened or closed?
 7 **A. I think I said earlier, I couldn't recall if it was**
 8 **still open or it was closed. I couldn't recall.**
 9 Q. You see I am going to suggest to you that when you got
 10 there, right, you would have been concentrating on the
 11 immediate threat from that side of the vehicle. Can we
 12 agree on that?
 13 **A. Well, I have heard a shot go off and I was in that much**
 14 **fear for my safety and that of my colleagues I took my**
 15 **safety off my weapon and I have come round. So I would**
 16 **be concentrating, yes, on that side of the vehicle.**
 17 Q. Thank you.
 18 You would have seen straight away that that side of
 19 the vehicle was empty. Can we agree on that?
 20 **A. My -- I was -- my attention was drawn to the person**
 21 **outside the vehicle.**
 22 Q. Right. I am going to suggest to you that that is where
 23 all your energies and concentration would have been on
 24 the person out of the vehicle. That must have been
 25 a big surprise to you?

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1 **A. Yes, it was.**
 2 Q. You must have been thinking to yourself, "How on earth
 3 did he get out of the vehicle without us seeing this?"
 4 **A. Yes, that's correct.**
 5 Q. Did you think you had botched the operation?
 6 **A. No.**
 7 Q. No?
 8 **A. No.**
 9 Q. Well, you don't see the door open?
 10 **A. Things happen in a split second, as in we have had to**
 11 **account for three, four, five seconds, you know.**
 12 Q. You see, I am going to suggest to you that that is where
 13 all your concentration was and you don't see, you know
 14 in your witness statement you say, "I don't recall
 15 seeing anybody on the driver side of ..."
 16 **A. No, I didn't.**
 17 Q. Sorry, go on. Go on, say what you were going to say.
 18 **A. No, I will let you finish.**
 19 Q. All right. In your witness statement, you say you don't
 20 recall seeing an officer on the driver's side, the
 21 offside of the vehicle, the Audi?
 22 **A. No, I don't recall seeing any officer on that side of**
 23 **the vehicle.**
 24 Q. Because I am going to suggest to you that you missed X7,
 25 who was there. For understandable reasons, you were

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1 concentrating on Totton.
 2 **A. If he has got round the front of the Audi and along the**
 3 **hedges that were in front of that car before me, he has**
 4 **done well, because if he is coming out of the alpha 1**
 5 **position he has to run round his door and go round the**
 6 **front of the Audi, whereas I am going out and going**
 7 **back, I haven't got to run past the width of my door.**
 8 Q. He is there, you don't see him.
 9 **A. That is what you are suggesting, sir.**
 10 Q. He is there, and he sees Anthony alive.
 11 **A. I can't answer for him, can I? I can only answer what**
 12 **I can see.**
 13 Q. I know, I'm putting it to you.
 14 **A. Oh right, well I can't answer for him.**
 15 Q. What we can agree on, there was one shot that you heard
 16 from a conventional weapon, not a shotgun?
 17 **A. That's correct.**
 18 Q. Correct? I am suggesting to you that your concentration
 19 is on Totton, that you have the sequence wrong. Do you
 20 follow?
 21 **A. You can suggest but that is how I recall it. That how**
 22 **it is in my statement.**
 23 Q. I understand that.
 24 **A. Yes.**
 25 Q. I am suggesting you haven't seen Totton get out of the

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1 car.
 2 **A. No, I haven't.**
 3 Q. You haven't seen Q9.
 4 **A. Why -- I wouldn't be focusing on Q9, would I, so ...**
 5 Q. Exactly. And you haven't seen X7, who is by the
 6 driver's door.
 7 **A. I saw no one on that side of the vehicle.**
 8 Q. Because you were not concentrating on that side of the
 9 vehicle.
 10 **A. My main concentration was on Mr Totton, you are correct,**
 11 **but glancing over, it is like, you know, I could see**
 12 **there was no police officers round that side of the**
 13 **vehicle.**
 14 Q. I am also going to suggest this, that your sequence is
 15 wrong in relation to the shot and the CS canister, I am
 16 going to suggest to you that it is when the CS gas
 17 canister goes in, Anthony is still alive and he flinches
 18 as a result of that canister going into the car.
 19 **A. Not at all.**
 20 Q. Well how do you know?
 21 **A. Because there was no other police officers round that**
 22 **vehicle, there was no one out of bravo near that**
 23 **vehicle. The shot that, you know, was fired, was before**
 24 **any window got smashed or any gas went into that**
 25 **vehicle.**

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<p>1 Q. Your concentration was elsewhere.</p> <p>2 A. And I have heard a smash as I have been dealing with</p> <p>3 Totton, and that was after I had heard the first shot.</p> <p>4 MR THOMAS: We will have to hear from X7, won't we.</p> <p>5 Sir, that is all I ask.</p> <p>6 A. Thank you.</p> <p>7 THE CHAIRMAN: Mr Weatherby.</p> <p>8 Questions from MR WEATHERBY</p> <p>9 MR WEATHERBY: Yes, officer, my name is Pete Weatherby and</p> <p>10 I am representing Gail Hadfield-Grainger, who is</p> <p>11 Anthony's partner. I just have a few follow on</p> <p>12 questions.</p> <p>13 A. Yes.</p> <p>14 Q. Firstly, just to return to the plan, on your account, X7</p> <p>15 broadcasts shortly before the strike --</p> <p>16 A. I believe he broadcast, yes, "Alpha will go to the</p> <p>17 driver's side".</p> <p>18 Q. The plan, such as you describe, is that alpha will deal</p> <p>19 with the driver's side, the offside --</p> <p>20 A. That's correct, sir.</p> <p>21 Q. -- and bravo and charlie will deal with the nearside?</p> <p>22 A. That's correct, sir.</p> <p>23 Q. Yes, so can we agree that, if you are right and that is</p> <p>24 heard by bravo and charlie, and I will come on to that</p> <p>25 in a moment --</p> <p style="text-align: center;">Page 137</p>	<p>1 Q. If you are not right or the broadcast was not heard,</p> <p>2 then bravo and charlie simply turn up to</p> <p>3 an unconventional strike without a plan?</p> <p>4 A. But we are told, we look for work. We are not exactly</p> <p>5 given which door to go to. We look for work and we fill</p> <p>6 in.</p> <p>7 Q. Flexibility?</p> <p>8 A. Yes.</p> <p>9 Q. Yes, I am not disputing flexibility, but in the context</p> <p>10 doesn't flexibility imply flexibility from a default</p> <p>11 plan or a starting point?</p> <p>12 A. Yes. Yes, that's correct.</p> <p>13 Q. Yes.</p> <p>14 In any event, on your account, you end up with the</p> <p>15 commander, the operational commander, on his own --</p> <p>16 A. Yes.</p> <p>17 Q. -- down one side of the car?</p> <p>18 A. Yes.</p> <p>19 Q. Yes?</p> <p>20 A. Yes.</p> <p>21 Q. You end up with yourself on the other side of the car</p> <p>22 and you end up with Q9 in the car?</p> <p>23 A. Yes, providing cover. Yes, that's correct.</p> <p>24 Q. When bravo officers arrive to this scene that on either</p> <p>25 account they are not expecting --</p> <p style="text-align: center;">Page 139</p>
<p>1 A. Yes.</p> <p>2 Q. But if you are right, the bravo officers are sat in that</p> <p>3 car expecting to get to the scene very shortly after</p> <p>4 you --</p> <p>5 A. Yes.</p> <p>6 Q. -- and that three alpha officers are going to be running</p> <p>7 round to the driver's side of the stolen Audi?</p> <p>8 A. Yes.</p> <p>9 Q. And they are to go as quickly as they can to the</p> <p>10 nearside?</p> <p>11 A. Yes.</p> <p>12 Q. Yes.</p> <p>13 If that broadcast was made and heard, they actually</p> <p>14 happen upon a scene which is completely different to</p> <p>15 that?</p> <p>16 A. That's correct, sir, yes.</p> <p>17 Q. Yes.</p> <p>18 If you are wrong and that broadcast was not made or</p> <p>19 was not heard --</p> <p>20 A. Yes, I can't, you know, account for whether they got the</p> <p>21 message. I was not in the bravo car.</p> <p>22 Q. Yes, indeed, I accept that and you have heard it put to</p> <p>23 you that all of the other officers disagree with you, or</p> <p>24 at least they say they didn't hear any broadcast.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 138</p>	<p>1 A. Yes.</p> <p>2 Q. -- they enter a scene which is dangerous to them,</p> <p>3 isn't it?</p> <p>4 A. You would have to ask them if it is dangerous to them.</p> <p>5 It is no different from any of MASTS I have been on, you</p> <p>6 know, you fill in, you look for work, you take in what</p> <p>7 is happening in front of you. It is like we had a plan</p> <p>8 and I saw that -- I deviated from the plan because it</p> <p>9 was tight for us both to go round the front.</p> <p>10 Q. Yes, but on any of these accounts, on your account --</p> <p>11 A. Yes.</p> <p>12 Q. -- bravo and charlie officers would not know Q9 had</p> <p>13 an arc of fire across the front of the car.</p> <p>14 A. I only remember having a discussion with Q9 about the</p> <p>15 cover from the vehicle. I don't know if X7 relayed that</p> <p>16 to the other cars. The only thing that I thought he had</p> <p>17 relayed or, you know, I heard him saying was the alpha</p> <p>18 would go to the offside. As in the cover, yes, they</p> <p>19 might not know.</p> <p>20 Q. On your account, as far as you are aware, absolutely no</p> <p>21 broadcast about Q9's role?</p> <p>22 A. Not that I am aware. I don't know.</p> <p>23 Q. Yes, so when the officers turn up, they go into a scene</p> <p>24 where there is an arc of fire that they know nothing</p> <p>25 about?</p> <p style="text-align: center;">Page 140</p>

<p>1 A. Yes.</p> <p>2 Q. Which is dangerous, isn't it?</p> <p>3 A. I would like to think that the training that we all</p> <p>4 have, if an officer runs in front of my gun I either</p> <p>5 chop down or I shout "No reply".</p> <p>6 Q. It is dangerous, isn't it?</p> <p>7 A. Everything we do is dangerous. There is not one</p> <p>8 firearms job I have been on that isn't dangerous and we</p> <p>9 accept that responsibility; it's a responsibility we</p> <p>10 volunteer for.</p> <p>11 Q. I am not going to quibble with you about that, of course</p> <p>12 it is a dangerous job but you minimise danger. That is</p> <p>13 an important part of your job, isn't it?</p> <p>14 A. Yes.</p> <p>15 Q. Part of the minimisation is not changing a plan at the</p> <p>16 last moment to create an arc of fire which other</p> <p>17 firearms officers then end up going through?</p> <p>18 A. We can deal with a situation that presented itself, like</p> <p>19 I say Q9 would know that if someone runs in front of his</p> <p>20 gun he would either shout -- depending on what stress he</p> <p>21 is feeling to shout "No reply" or, "Chop up", or "Chop</p> <p>22 down".</p> <p>23 Q. Yes, I have asked you my questions about that topic.</p> <p>24 I am going to move on.</p> <p>25 You told us this morning that you thought when you</p> <p style="text-align: center;">Page 141</p>	<p>1 A. It is -- we have the ones on in the car, and then it</p> <p>2 should we have to need to get out on foot and perform</p> <p>3 a foot strike, I will have my own body set on and I will</p> <p>4 have an earpiece in, which I can just close and it will</p> <p>5 work.</p> <p>6 Q. Right so on the ground you have a means of communication</p> <p>7 between you?</p> <p>8 A. I had mine on, yes.</p> <p>9 Q. Yes. That would be something you would generally do?</p> <p>10 A. Some people -- if you were a driver, they wouldn't</p> <p>11 necessarily have the radio kit on, no.</p> <p>12 Q. Yes, but if you deploy on a strike then you would want</p> <p>13 to have the best means of communication. Is that right?</p> <p>14 A. Sometimes people are identified out of each vehicle,</p> <p>15 should it come to a foot option and they would be the</p> <p>16 ones that put the covert kit on, yes.</p> <p>17 Q. Finally I want to return to the issue of what happened</p> <p>18 after the incident. Can you help us about this meeting</p> <p>19 on the 8th?</p> <p>20 Do you have any notes about that?</p> <p>21 A. No, I don't, sir.</p> <p>22 Q. Why is that?</p> <p>23 A. I can hardly recall the meeting and I wasn't told to</p> <p>24 make any notes and didn't see any relevance for it.</p> <p>25 Q. The first -- as far as I am concerned, and I will be</p> <p style="text-align: center;">Page 143</p>
<p>1 heard the shot, shortly after getting out of the alpha</p> <p>2 car, when you were I think behind the alpha car, yes?</p> <p>3 A. Coming round the back, yes.</p> <p>4 Q. You thought that it was people shooting at officers?</p> <p>5 A. I thought that it was a shot, yes, towards the police,</p> <p>6 yes.</p> <p>7 Q. Yes. You have told Mr Beer about things that are</p> <p>8 shouted. If that was what you thought at the time, why</p> <p>9 didn't you shout "Contact", why didn't you alert other</p> <p>10 officers to what you thought?</p> <p>11 A. Because my adrenalin is most probably pumping at that</p> <p>12 point and I have put my safety catch to fire thinking</p> <p>13 I could potentially be going round the corner facing</p> <p>14 a man with a gun.</p> <p>15 Q. Yes, it would be minimising the danger if you shouted</p> <p>16 "Contact" so other officers would know what your belief</p> <p>17 was at that time. Yes?</p> <p>18 A. Well, if bravo was out of the vehicle, yes.</p> <p>19 Q. Now, well, bravo were either out of the vehicle or</p> <p>20 almost out of the vehicle by that point, weren't they?</p> <p>21 A. Yes, I wasn't paying attention but they could be, yes.</p> <p>22 Q. Yes.</p> <p>23 You mentioned again this morning an earpiece.</p> <p>24 A. Yes.</p> <p>25 Q. Is the earpiece the feed from the radio communications?</p> <p style="text-align: center;">Page 142</p>	<p>1 corrected if I am wrong -- we knew about this meeting</p> <p>2 was yesterday in evidence, when one of your colleagues</p> <p>3 was asked about an entry in their notebook which simply</p> <p>4 said "PFOA". The statement you have been asked about</p> <p>5 today from Mr Williams of the PFOA came as a result of</p> <p>6 that.</p> <p>7 A. Yes, I recall a meeting. I couldn't say when it was,</p> <p>8 I have been reminded of the 8th.</p> <p>9 Q. Given that the detailed accounts were not made until</p> <p>10 after this --</p> <p>11 A. Yes.</p> <p>12 Q. -- do you think it is a matter of some importance that</p> <p>13 all of you were together in a meeting the day before?</p> <p>14 A. Yes, it would be at an Inquiry, it would, yes.</p> <p>15 Q. Yes. Any reason you didn't make a note about it or what</p> <p>16 happened?</p> <p>17 A. No.</p> <p>18 Q. Do you think you should have done?</p> <p>19 A. Not particularly, no.</p> <p>20 Q. It seems that Mr Williams made no documentation about</p> <p>21 the meeting either, according to his statement. Do you</p> <p>22 recall anybody else making a note?</p> <p>23 A. I don't, but it is like I said I got a phone call --</p> <p>24 I got phone calls about the incident at home, I have had</p> <p>25 welfare phone calls while I was at home. I didn't make</p> <p style="text-align: center;">Page 144</p>

<p>1 notes of those.</p> <p>2 Q. This was a meeting at which the PFOA turned up and --</p> <p>3 I will read it to you:</p> <p>4 "To my surprise they [presumably you, the officers]</p> <p>5 announced that they had not made their stage four</p> <p>6 accounts [their detailed accounts, detailed statements].</p> <p>7 This was now some five days after the incident. We</p> <p>8 immediately expressed our concern about the need to</p> <p>9 submit these statements to the relevant investigative</p> <p>10 authority, the IPCC, within seven days. We took our</p> <p>11 concerns to the federation representative. It appeared</p> <p>12 a mixture of lawyers, IPCC and GMP professional</p> <p>13 standards might have caused the delay. We suggested</p> <p>14 politely that all officers may be better off being with</p> <p>15 [then they name a particular firm of solicitors] as they</p> <p>16 had a proven track record and a clear understanding</p> <p>17 around post-incident procedures."</p> <p>18 Did you not think those concerns that were being</p> <p>19 raised were worthy of you making a note, given what you</p> <p>20 have told us about your concerns?</p> <p>21 A. No, but listening to that that might be what prompted us</p> <p>22 doing the statements on the 9th.</p> <p>23 Q. Do you not think it was something of note that you had</p> <p>24 met with another officer that had shot and killed</p> <p>25 somebody, before you had committed yourself to your</p> <p style="text-align: center;">Page 145</p>	<p>1 A. I can't recall.</p> <p>2 Q. You cannot recall?</p> <p>3 A. I can't recall.</p> <p>4 Q. This morning when you were giving that evidence, and you</p> <p>5 mentioned that you thought somebody might have jotted it</p> <p>6 down --</p> <p>7 A. Yes.</p> <p>8 Q. -- was that a recollection you did or you didn't have?</p> <p>9 A. It is that long ago, I can't recall. I thought it was</p> <p>10 just as simple as what was said there, but I can't</p> <p>11 remember who to because normally I would do an arrest</p> <p>12 statement on the night.</p> <p>13 Q. Yes. You have told us already that it is important</p> <p>14 generally for police officers to make accounts as</p> <p>15 quickly as possible, yes?</p> <p>16 A. Yes.</p> <p>17 Q. About significant incidents of all sorts?</p> <p>18 A. Yes.</p> <p>19 Q. Yes?</p> <p>20 A. Yes.</p> <p>21 Q. Why is it so difficult to recall whether you gave</p> <p>22 an initial account on the night?</p> <p>23 A. Because there was a lot happening on that night. First</p> <p>24 we got sent over to Openshaw, then to Claytonbrook, we</p> <p>25 were put in a room. And then we were taken out and our</p> <p style="text-align: center;">Page 147</p>
<p>1 statement?</p> <p>2 A. Well, I don't know how he came to come up to talk,</p> <p>3 I don't know who arranged that.</p> <p>4 Q. With respect, I didn't ask you how he came to be there,</p> <p>5 it is the fact that you met with him.</p> <p>6 A. He came and talked to us all, yes.</p> <p>7 Q. You told us this morning -- if I've got this wrong</p> <p>8 correct me -- that you had made some kind of initial</p> <p>9 account which somebody else had jotted down.</p> <p>10 A. I thought on the night, you know, because obviously</p> <p>11 people have been arrested at the scene so they will want</p> <p>12 to know who has arrested them and I might have just said</p> <p>13 to someone:</p> <p>14 "I was in the alpha 3 position, I have arrested</p> <p>15 Mr Totton."</p> <p>16 And I don't know --</p> <p>17 Q. I might have said something? Well, did you say</p> <p>18 something? Given the enormity of this event.</p> <p>19 A. I would have thought they would want to know who has</p> <p>20 arrested who, so, yes, I would have thought I would have</p> <p>21 told someone.</p> <p>22 Q. I would have thought? Can you try to keep to what did</p> <p>23 happen, what you can recall happening.</p> <p>24 A. Right.</p> <p>25 Q. Did you give somebody an initial account?</p> <p style="text-align: center;">Page 146</p>	<p>1 weapons were seized, you know, evidentially. There was</p> <p>2 a lot going on that night.</p> <p>3 Q. You can recall all of that --</p> <p>4 A. Yes.</p> <p>5 Q. -- but you are not sure whether you gave an initial</p> <p>6 account or not?</p> <p>7 A. I can't remember how many people we spoke to that night,</p> <p>8 from the various PSB, the PIP people, you know.</p> <p>9 Q. Yes, you then said that you thought that there was some</p> <p>10 kind of dispute I think between the IPCC and somebody</p> <p>11 else about interviews. Is that right?</p> <p>12 A. Yes. I don't know whether it was via our supervisors</p> <p>13 but, you know, I know -- I didn't even know or could</p> <p>14 relate it to when the Met had came up about us providing</p> <p>15 statements and the length of time that had gone on, but</p> <p>16 I don't know who the dispute was.</p> <p>17 Q. Yes, so you may have been told that later. Is that what</p> <p>18 you are saying?</p> <p>19 A. I can't recall.</p> <p>20 Q. You cannot recall?</p> <p>21 A. No.</p> <p>22 Q. Do you recall on the night saying to anybody:</p> <p>23 "Shall I make an account? Will the IPCC be</p> <p>24 interviewing me, as the investigating authority when</p> <p>25 somebody dies in a police operation?"</p> <p style="text-align: center;">Page 148</p>

<p>1 A. No, I think they spoke to the principal officers, anyone 2 that had discharged a firearm on the night. Or, you 3 know, the canister, but -- 4 Q. Indeed, and we will ask them about that. I am asking 5 you about your role and what you did. 6 A. No one spoke -- no one that I can recall asked me to 7 provide a statement on that night, no. 8 Q. Did you not say, "Shall I do that?" 9 A. No, I didn't. There was a lot of things going on and 10 I didn't, no. 11 Q. So what, you were going to then leave it until somebody 12 told you to make an account? 13 A. Yes. You know, we would be told when they required 14 a statement. 15 Q. Have you ever done that in any other significant 16 investigation or incident that you have been involved 17 in? 18 A. No, sir, I haven't. But I have never been involved in 19 a fatal shooting either, sir. 20 Q. Yes. Why should it be any different in a fatal shooting 21 to any other significant investigation or incident that 22 you have been involved in? 23 A. We were being guided by people that were running the 24 PIP. 25 Q. Right, who was guiding you as to whether you did or did</p> <p style="text-align: center;">Page 149</p>	<p>1 Q. Right, so you didn't want to provide the investigative 2 body, the IPCC, with an interview? 3 A. I would give them a written statement, I was quite happy 4 to provide a written statement, yes, sir. 5 Q. Yes, it was not that you wanted to control the process 6 rather than to answer legitimate questions that the 7 investigative authority were going to ask you, that 8 wasn't the reason. Was it? 9 A. No, that is not the case, no. 10 Q. Because you subsequently gave an interview to the police 11 in the defence of Mr Fahy, didn't you? 12 A. Yes. And the officer that took that, I know him 13 personally. 14 Q. Yes. We then come to the 8th and then to the 9th and 15 again you are in a room with all of the officers, 16 including Q9, yes? 17 A. Yes. 18 Q. That -- 19 A. I don't know if Q9 was there, I can't recall. 20 Q. You cannot recall that? 21 A. I can remember, you know, a number of officers being 22 there and I can't recall if Q9 was there. 23 Q. You then, after six days, put down your first account of 24 this matter with the help of a flip chart and other 25 officers?</p> <p style="text-align: center;">Page 151</p>
<p>1 not make a statement? 2 A. I can't recall. 3 Q. You cannot recall? 4 A. We never got told, "Don't make a statement", we never 5 got told, "Make a statement". We were told to go to 6 various locations and spoken to, weapons were taken and, 7 you know, I just cannot recall. 8 Q. Let me put it this way: was it your decision not to make 9 a statement for six days or was it a decision of Greater 10 Manchester Police? 11 A. I think it was -- it might have been a collective. 12 I know I didn't want to provide a statement where 13 I would be videoed or audioed. That was my personal -- 14 I didn't want that. 15 Q. You didn't want to provide a videoed or audioed 16 statement -- 17 A. For the IPCC, no. 18 Q. -- or interview? 19 A. No, I didn't sir, no. 20 Q. Why was that? 21 A. Because you don't know who works for the IPCC, you don't 22 know where videos can end up. People are all vetted, we 23 have had it with comms staff that are vetted to 24 different levels and information has got out, and 25 I don't want any harm coming to my family.</p> <p style="text-align: center;">Page 150</p>	<p>1 A. The only bit of the flip chart, as I said earlier, was 2 to try and confirm the registration. I just cracked on 3 with my own statement. 4 MR WEATHERBY: Yes, thank you very much. 5 THE CHAIRMAN: Mr Davies. 6 Questions from MR DAVIES 7 MR DAVIES: I am asking questions on behalf of Q9. 8 A. Yes. 9 Q. It is about five topics, the first of which is hard 10 stops. 11 In general terms, in the GMP at least, you don't 12 conduct hard stops do you on moving vehicles? 13 A. No, we don't. 14 Q. Can you explain in short form why that is? 15 A. It is more dangerous and it is unpredictable, you know, 16 where vehicles can end up and it's more risk to members 17 of the public. 18 Q. To take an example, to have conducted a hard stop of the 19 subject or target vehicle on the road to Culcheth from 20 Manchester -- 21 A. Yes. 22 Q. -- you would first of all have to know what route the 23 vehicle was going to take, to do any planning 24 whatsoever? 25 A. Yes, if it is approaching a roundabout, a</p> <p style="text-align: center;">Page 152</p>

1 **traffic-controlled, traffic-light controlled junction,**
 2 **yes.**
 3 Q. You have to be able to get three vehicles at least,
 4 assuming a hard boundary, in front, behind and alongside
 5 that vehicle to conduct a hard stop?
 6 **A. Yes, one in front and behind and then another one could**
 7 **come alongside or hang back and providing support, stop**
 8 **cars coming up and knocking people over.**
 9 Q. To do that when the subject vehicle is moving on
 10 a public road, is high powered and likely to take
 11 measures to escape, is just obviously intrinsically
 12 dangerous. Isn't it?
 13 **A. It is more dangerous, yes.**
 14 Q. You have to have a situation where the vehicle is
 15 stopped and that can arise spontaneously, but it doesn't
 16 always?
 17 **A. Yes.**
 18 Q. Secondly here, you have been asked questions about
 19 rehearsals of the particular hard stop, if that is the
 20 correct term, that occurred in the car park at Culcheth.
 21 Could you look at tab 27 of the general firearms
 22 bundle. Tab 27, page 575, it should be one of the many
 23 overhead photographs of the scene.
 24 **A. Is it in this one? Sorry, I've got it open. Thank you.**
 25 **Tab?**

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1 Q. Tab 27.
 2 THE CHAIRMAN: Do I need to have my own copy for this
 3 purpose? My tab 27 is empty actually.
 4 **A. Mine is the same, I am afraid.**
 5 MR DAVIES: Well O1 -- it is the overhead photo of the
 6 scene, so I can probably do it orally, just to describe
 7 it. O1, page 325 is another example.
 8 THE CHAIRMAN: 575 in my bundle is actually in divider 8 and
 9 those are aerial photographs.
 10 **A. That is 325 I've got. I've got 325, sir.**
 11 MR DAVIES: Yes, that fine. It is an overhead photograph of
 12 the car park, of one form or another.
 13 **A. Yes.**
 14 Q. Looking at this scene, you have been asked whether you
 15 could have done a rehearsal in advance of the execution
 16 of the operation, all right.
 17 Just looking at this scene in terms of variables,
 18 dynamic variables. The position of the subject vehicle,
 19 the red Audi, that may have moved between any rehearsal
 20 and any actual operation, do you agree --
 21 **A. Yes.**
 22 Q. -- within the car park?
 23 The occupants of the vehicle may move?
 24 **A. There is hundreds of permutations there, you could have**
 25 **had people at the back of the car, near the bins, you**

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1 **know, coming out. You could have had people cutting**
 2 **through the car park, all kinds of things.**
 3 Q. It is almost too obvious to state that you cannot
 4 rehearse for this, it is dynamic?
 5 **A. If days before the scene parked in a certain situation**
 6 **or a vehicle then you would, you would be a fool not to**
 7 **practise it but with this, you know, it was told on the**
 8 **day where it was.**
 9 Q. Seconds to second this is a variable scene, isn't it?
 10 **A. Yes.**
 11 Q. As it happens, there is a member of the public's green
 12 motor car, not in the immediately adjacent space but the
 13 next one --
 14 **A. Yes --**
 15 Q. -- relative to the Audi?
 16 **A. -- that's correct.**
 17 Q. That could have been different between any supposed
 18 rehearsal and the actual operation?
 19 **A. Yes, you could have had a car parked right at the**
 20 **nearside of it.**
 21 Q. Which would have changed the dynamic completely of the
 22 stop?
 23 **A. That's correct.**
 24 Q. You could have vehicles in different positions within
 25 the car park, static or moving, that could change the

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1 dynamic?
 2 **A. That's correct, and that could be happening as we are**
 3 **flowing?**
 4 Q. Members of the public inadvertently wandering through
 5 the car park that would change the dynamic?
 6 **A. That is why we don't go into a too detailed plan**
 7 **beforehand, because all you are going to do is confuse**
 8 **the operatives prior to going in.**
 9 Q. Whilst you can rehearse basic thinking, that is so to
 10 say finding work as a team instinctively, based on
 11 training, covering nearside, offside and the rest, that
 12 is a dynamic reaction to the scene that presents?
 13 **A. Yes, very dynamic.**
 14 Q. Hence in your case, when you left alpha, from the
 15 nearside rear seat, you decided, dynamically, to go
 16 round the back of alpha rather than the front?
 17 **A. Yes, because the quickest -- the objective there is to**
 18 **keep it contained, keep -- stop the people from**
 19 **escaping. And the quickest way of doing that would be**
 20 **for X7 to go round the front and I didn't even realise**
 21 **it was as tight as what it is and I have come round the**
 22 **back to stop any escape. I mean someone could have**
 23 **quite easily from charlie or bravo come along the hedge**
 24 **line and cut anyone's escape off there.**
 25 Q. I am going to come back to the incident very shortly, in

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1 a moment, but the second major heading for my questions
 2 is the question of intelligence. You were asked
 3 questions whether, if you had been told the
 4 intelligence, about the 2008 armed robbery that was
 5 given to you in the briefing had been different it may
 6 have affected your assessment?
 7 **A. Yes.**
 8 Q. All right?
 9 The binary outcome of a briefing, is the ICI, isn't
 10 it?
 11 **A. Yes.**
 12 Q. Identity, capability and intent. Is that the key thing
 13 you take away from a briefing?
 14 **A. It is one of the main things, yes.**
 15 Q. Are you aware of the intelligence that you may have been
 16 given but were not in relation to any of operations
 17 Ascot, Vulture or Blythe?
 18 **A. I recall all them operations, but I don't know in great**
 19 **detail whether it was armed robbery gangs, kidnap gangs,**
 20 **you know, threats to life, drug dealing, I couldn't**
 21 **recall, but they all do ring a bell with me, yes.**
 22 Q. The question is. Are you aware from memory of the
 23 intelligence that you could have been given about the
 24 subjects of this operation, particularly Messrs Totton
 25 and Grainger, that you were not that arose from those

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1 operations?
 2 **A. Like I said to Mr Beer before, that might be one of the**
 3 **operations where I remember Mr Totton and Mr Grainger**
 4 **featuring on one of the briefings, but I couldn't tell**
 5 **you in what detail that was.**
 6 Q. Okay.
 7 Secondly, in terms of you as an AFO at a briefing,
 8 receiving intelligence --
 9 **A. Yes.**
 10 Q. -- and the ICI outcome, you trust it, don't you, that
 11 process has been followed to get to that informed
 12 assessment?
 13 **A. You trust that whatever is getting put on that there,**
 14 **the briefing slides, is correct, yes. And whether it is**
 15 **gained off the person putting the PowerPoint together or**
 16 **it is what is collated from meeting and then later put,**
 17 **you know, because from reading through, there are gaps**
 18 **in between a firearms officer putting the plan together**
 19 **and going on the normal OPUS system and gleaning it or**
 20 **having it sent through from the Robbery Unit.**
 21 Q. I will not get you get drawn into that, that is for the
 22 chairman.
 23 Your account of the event at the scene, third topic,
 24 and just back again I am afraid to your statement of
 25 9 March.

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1 **A. Yes.**
 2 Q. To put it in context, there had been a meeting including
 3 Mr Williams from the PFOA the day before?
 4 **A. Yes.**
 5 Q. Just so I am clear, was any element of your evidence
 6 about this incident discussed with Mr Williams?
 7 **A. No.**
 8 Q. He uses the expression "welfare" I think at least four
 9 times in his statement.
 10 **A. Yes, I mean I have had cause to use the PFOA when I was**
 11 **injured in training and the welfare and support they**
 12 **offer is very good.**
 13 Q. Right.
 14 What I want to concentrate on in your statement is
 15 this, please. I am not going to try to put three
 16 seconds, five seconds or whatever on it, but if you look
 17 at page 2 of 4 of your statement, of 9 March --
 18 **A. Yes, sir.**
 19 Q. -- the major paragraph at the bottom.
 20 **A. Yes.**
 21 Q. "I heard X7 say 'Strike, strike' as W4 drove the alpha
 22 vehicle across the front of the red Audi ..."
 23 **A. That's correct.**
 24 Q. "... I alighted from the alpha car. My SLP and Taser
 25 were holstered. I had my MP5 loaded and ready with the

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1 safety on ..."
 2 Then this:
 3 "... as I ran round the back of the alpha car,
 4 I heard someone shouting 'Armed police, show me your
 5 hands' ..."
 6 **A. Yes.**
 7 Q. "... as I began to shout 'Armed police', I heard a crack
 8 like ice breaking and a bang from a weapon being fired."
 9 **A. That's correct, sir.**
 10 Q. Pause there. So without putting seconds on it, it is
 11 the time it takes you to get out of the car, you are
 12 running around the back of the alpha vehicle, you hear
 13 this "Armed police, show me your hands" being shouted.
 14 **A. Yes.**
 15 Q. You then begin to shout "Armed police", at which point
 16 you hear a conventional firearm being discharged and
 17 a cracking sound?
 18 **A. Yes, that's correct, sir.**
 19 Q. Right.
 20 Your first memory then of the scene in front of you
 21 is taking in peripherally that there is no officer on
 22 the offside of the vehicle?
 23 **A. I might have seen Mr Totton, I don't know in what order**
 24 **but I have had a quick look towards the vehicle, just**
 25 **seconds, I can't say in what order but I was aware there**

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<p>1 was no one on that side of the vehicle and then my main</p> <p>2 threat is the back of what I know is Mr Totton.</p> <p>3 Q. Right, I am coming on to that. You are taking it in in</p> <p>4 a snapshot?</p> <p>5 A. Yes.</p> <p>6 Q. There is no officer on the offside of the subject car?</p> <p>7 A. That I could see, no, sir.</p> <p>8 Q. If I have interpreted you correctly you would find it</p> <p>9 surprising if X7 had reached there before you were where</p> <p>10 you were?</p> <p>11 A. Yes, and even more so, now, looking at the pictures.</p> <p>12 Q. Right.</p> <p>13 A. Because as we were driving up I knew it was going to be</p> <p>14 tight, but I didn't realise --</p> <p>15 Q. Then you are taking in, as it turned out, Mr Totton --</p> <p>16 A. Yes.</p> <p>17 Q. -- and he has his back to you?</p> <p>18 A. That's correct, sir.</p> <p>19 Q. Does he represent a threat with a firearm with his back</p> <p>20 to you, without more?</p> <p>21 A. No, no, sir.</p> <p>22 Q. Your statement goes on:</p> <p>23 "I do not recall seeing any other officers around</p> <p>24 the red Audi, I had my weapon on aim at the male ..."</p> <p>25 Is this the male with his back to you?</p> <p style="text-align: center;">Page 161</p>	<p>1 A. No, sir.</p> <p>2 Q. Had he disobeyed a command by making a movement or</p> <p>3 a movement that may be interpreted as a movement for</p> <p>4 a weapon --</p> <p>5 A. Yes, sir.</p> <p>6 Q. -- your reaction may have been different?</p> <p>7 A. Yes, I might have shot him.</p> <p>8 Q. Yes.</p> <p>9 Mr Totton himself, you obviously got a look at him,</p> <p>10 on the scene outside what was after all to your</p> <p>11 knowledge a stolen high powered motor car with false</p> <p>12 plates.</p> <p>13 A. That's correct, sir.</p> <p>14 Q. That was sitting in a car park adjacent to one of the</p> <p>15 premises, Sainsbury's, that had been identified in your</p> <p>16 briefing?</p> <p>17 A. Yes, and I think it had been mentioned he had been seen</p> <p>18 coming out of a bush, I don't know whether on a previous</p> <p>19 occasion, that is why when I got a phone call from</p> <p>20 a welfare officer I said had that area been searched for</p> <p>21 a weapon.</p> <p>22 Q. Do you know, even now, the extent of the search</p> <p>23 conducted by the IPCC?</p> <p>24 A. No, I don't or by Cheshire Police. I don't, because</p> <p>25 just with my personal experience, I can't believe that</p> <p style="text-align: center;">Page 163</p>
<p>1 A. That's correct, sir.</p> <p>2 Q. "... shouting 'Armed police, show me your hands'. The</p> <p>3 male, while I was saying this, immediately lay on the</p> <p>4 floor face down."</p> <p>5 A. Yes, he was starting to go down to the floor. That's</p> <p>6 correct, sir.</p> <p>7 Q. And you basically got control of him with your knee?</p> <p>8 A. That's correct and then I have seen his left hand.</p> <p>9 Q. Just to take a straightforward, perhaps common sensical</p> <p>10 point, this is a man who throughout has his back to</p> <p>11 you --</p> <p>12 A. Yes, sir.</p> <p>13 Q. -- who follows your command and goes to the floor --</p> <p>14 A. Yes, sir.</p> <p>15 Q. -- and then, whilst still on his front, you are able to</p> <p>16 get control of him --</p> <p>17 A. Yes, sir.</p> <p>18 Q. -- and eventually handcuff him?</p> <p>19 A. My colleague came up and handcuffed him, yes, sir.</p> <p>20 Q. There is no point in that process, is there, where he</p> <p>21 either has his front to you in a position to shoot</p> <p>22 you --</p> <p>23 A. No, sir.</p> <p>24 Q. -- or disobeys a command by making a movement that is</p> <p>25 inconsistent with the instruction?</p> <p style="text-align: center;">Page 162</p>	<p>1 we didn't recover any weapons and that is why when I got</p> <p>2 phoned up at home by Chief Inspector Hughes that, you</p> <p>3 know, he was asking how I was and I said:</p> <p>4 "Well, have they tried the bins at the back of the</p> <p>5 restaurant that ..."</p> <p>6 Q. You have said much of that already, I want to try and</p> <p>7 keep it tight.</p> <p>8 Mr Totton, the person you dealt with --</p> <p>9 A. Yes, sir.</p> <p>10 Q. -- is in what you took at first to be a woolly hat?</p> <p>11 A. Yes, a folded balaclava, woolly hat, yes.</p> <p>12 Q. He was wearing that when you first saw him?</p> <p>13 A. He was, yes, sir.</p> <p>14 Q. It turns out that was a rolled-up balaclava --</p> <p>15 A. Yes.</p> <p>16 Q. -- with two eye holes?</p> <p>17 A. Yes, sir.</p> <p>18 Q. He was also wearing specific, I think you used the</p> <p>19 expression tactical gloves?</p> <p>20 A. Yes, they look like military or, you know, stuff you</p> <p>21 would see law enforcement in the States wearing.</p> <p>22 Tactical gloves, they were better than the ones we get</p> <p>23 issued.</p> <p>24 Q. Based on your experience, just concentrating on</p> <p>25 Mr Totton, disregarding what the others were wearing --</p> <p style="text-align: center;">Page 164</p>

<p>1 A. Yes, sir.</p> <p>2 Q. -- looking at his clothing in isolation, was that</p> <p>3 consistent or inconsistent with somebody about to commit</p> <p>4 an armed robbery?</p> <p>5 A. Very consistent.</p> <p>6 Q. Do you need to wear tactical gloves to conduct a recce</p> <p>7 of a premises?</p> <p>8 A. I wouldn't think so, no, sir. You just wear normal</p> <p>9 gloves and then you would not be noticed.</p> <p>10 Q. Or a balaclava?</p> <p>11 A. Yes.</p> <p>12 Q. You are now aware that Mr Travers was wearing</p> <p>13 a balaclava?</p> <p>14 A. I am from the photograph there. I didn't really pay</p> <p>15 much attention to --</p> <p>16 Q. And gloves, and Mr Grainger was wearing gloves --</p> <p>17 A. I believe so, sir.</p> <p>18 Q. -- and had a black beanie hat in the footwell?</p> <p>19 A. I believe so.</p> <p>20 Q. Again, does any of that alter your assessment that these</p> <p>21 were men intent on committing armed robbery?</p> <p>22 A. No, not at all. If anything I think we might, you know,</p> <p>23 it is drawing that fine line of when you do a strike and</p> <p>24 it is a hard call by a TFC and then down to your OFC</p> <p>25 when you call a strike and, you know, reflecting as we</p> <p style="text-align: center;">Page 165</p>	<p>1 Questions from MS WHYTE</p> <p>2 MS WHYTE: W9, you cannot see me. My name is Anne Whyte, as</p> <p>3 you know, and I ask questions on behalf of Greater</p> <p>4 Manchester Police.</p> <p>5 I have a few topics, they are all brief.</p> <p>6 A. Yes, ma'am.</p> <p>7 Q. You have been asked about the habit that you had</p> <p>8 observed of AFOs referring to MASTS as a tactic.</p> <p>9 A. Yes, that's correct.</p> <p>10 Q. Did you have any sense that part of that habit was borne</p> <p>11 of linguistic convenience, it is shorter to say "tactic"</p> <p>12 than it is, "Platform from which, as we all know, there</p> <p>13 are a variety of options that can be delivered whilst</p> <p>14 supporting ..."</p> <p>15 A. Yes, that is correct. AFOs would still know that from</p> <p>16 that you could do various options, whether it be contain</p> <p>17 and call out, you know, compliance stop, or</p> <p>18 an extraction or in extreme circumstances other options.</p> <p>19 Q. Thank you.</p> <p>20 Could I ask you please to look at the general</p> <p>21 firearms bundle, volume 1, tab 22, page 1267.</p> <p>22 A. That is volume 2?</p> <p>23 MS WHYTE: It is in my volume 1. It is tab 22 and it is</p> <p>24 page 1267. It is the PowerPoint briefing of 3 March.</p> <p>25 A. Yes, 1267, yes.</p> <p style="text-align: center;">Page 167</p>
<p>1 do, firearms officers, someone has lost their life and</p> <p>2 it is a serious thing. Did we strike too early? You</p> <p>3 know, but then are you putting members of the public at</p> <p>4 danger? It is ones that, you know, we will reflect on</p> <p>5 ourselves.</p> <p>6 Q. It was part of the briefing, final point, that officers</p> <p>7 should not run between police cars and the subject car.</p> <p>8 That is the distinction, isn't it?</p> <p>9 A. Yes, you don't -- just in case it starts making any</p> <p>10 movement, we have had officers injured on strikes where</p> <p>11 they tried doing that.</p> <p>12 Q. So if someone did that, it would be contrary, both to</p> <p>13 the briefing and to training?</p> <p>14 A. Yes, if they could justify why they have done it, I am</p> <p>15 not saying it would never happen. We have not --</p> <p>16 because it was a fatality, we have never had a debrief</p> <p>17 for this. But after doing strikes where there is no --</p> <p>18 we have debriefs and it would be brought out anything,</p> <p>19 why did you fire the shotgun? Why did you run in</p> <p>20 between the vehicles?</p> <p>21 And it would be for them to justify it then, sir.</p> <p>22 MR DAVIES: I will leave it there, thank you.</p> <p>23 THE CHAIRMAN: Ms Whyte.</p> <p>24 MS WHYTE: Thank you, sir.</p> <p>25</p> <p style="text-align: center;">Page 166</p>	<p>1 Q. Do you have that, W9?</p> <p>2 A. I do, yes, ma'am.</p> <p>3 Q. You can see that there are four paragraphs.</p> <p>4 A. Yes, I can.</p> <p>5 Q. The first, would you agree, relates to current</p> <p>6 intelligence?</p> <p>7 A. Yes.</p> <p>8 Q. That is an assessment by people other than you. Do you</p> <p>9 assume that it is based on recent intelligence, the</p> <p>10 sources of which you are not informed of?</p> <p>11 A. I would on that, yes.</p> <p>12 Q. Yes.</p> <p>13 Item 3 is also up-to-date recent intelligence,</p> <p>14 isn't it?</p> <p>15 A. Other than me knowing now that the registration on there</p> <p>16 is wrong. Yes, that's correct.</p> <p>17 Q. Sure.</p> <p>18 Item 4, again does it not suggest recent</p> <p>19 intelligence about the recce's?</p> <p>20 A. It does, ma'am.</p> <p>21 Q. Because unless they were recent it wouldn't really be</p> <p>22 very relevant, would it?</p> <p>23 A. Yes.</p> <p>24 Q. Three out of four of those reflect contemporaneous or</p> <p>25 recent intelligence?</p> <p style="text-align: center;">Page 168</p>

1 **A. Yes ma'am.**
 2 Q. The second one relates to historic matters, doesn't it?
 3 **A. Yes, it does.**
 4 Q. It begins with the words, "There is intelligence to
 5 suggest ..."
 6 How would you treat the expression, "There is
 7 intelligence to suggest"? I don't think you have
 8 actually been asked that.
 9 **A. It might be where they might have uncorroborated**
 10 **evidence that it might have been that these subjects**
 11 **involved in it, but not hard evidence as such.**
 12 Q. When listening to a briefing in the context of subjects
 13 that you think might be going to commit armed robbery,
 14 what is more important to you, current intelligence or
 15 the historic intelligence?
 16 **A. The current intelligence.**
 17 Q. I would like to ask you about the issue of whether or
 18 not you are told there is specific intelligence that the
 19 subjects will or may be armed, all right.
 20 **A. Yes.**
 21 Q. If there is specific intelligence that your subjects or
 22 suspects are likely to be armed. That is something you
 23 would expect to be told, isn't it?
 24 **A. That's correct, yes.**
 25 Q. As you have explained, because it is important.

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1 You have also said it is rare to have that type of
 2 specific intelligence, either before or during your
 3 deployment. Is that right?
 4 **A. Yes, that's correct.**
 5 **From speaking from experience, a lot of criminals**
 6 **that commit these type of offences will not drive there**
 7 **with weapons in the car, sometimes they could have them**
 8 **delivered by a second car that may also be stolen.**
 9 Q. Yes, they are very surveillance aware, aren't they --
 10 **A. That's correct.**
 11 Q. -- generally speaking?
 12 Can we take it that as an authorised firearms
 13 officer, you would be aware that, if you and your
 14 colleagues have been authorised to deploy, that is
 15 because someone has been satisfied that the subjects may
 16 have access to firearms or other potentially lethal
 17 weapons or be otherwise so dangerous that the deployment
 18 of officers such as yourselves are considered to be
 19 appropriate?
 20 **A. Yes, by the time we get to a briefing, that's correct,**
 21 **yes.**
 22 Q. If no reference has been made to any specific
 23 intelligence of the sort we have been discussing, would
 24 you take away the view that if the working assumption is
 25 that they are going to commit armed robbery, they may

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1 have access to or use firearms or other types of
 2 weapons?
 3 **A. That is correct, I would.**
 4 Q. The first discharge of the shotgun at the car park on
 5 3 March was to the front nearside tyre of the red Audi,
 6 wasn't it?
 7 **A. I would have heard the shot. I wouldn't have seen, you**
 8 **know, or know which tyre it was to be fair.**
 9 Q. Okay.
 10 It wasn't where you were with Mr Totton?
 11 **A. No, because I was aware when that one got done, because**
 12 **it was close to where we were.**
 13 Q. How far away, doing your best, do you think you were
 14 when the rear nearside tyre was deflated?
 15 **A. A foot, a foot and a half?**
 16 Q. Moving to a different topic, Mr Williams from the Police
 17 Firearms Officers' Association has provided a document,
 18 part of which was put to you today, concerning the
 19 meeting on 8 March.
 20 **A. Yes.**
 21 Q. I would like you to tell us, please, whether you agree
 22 with some of the things he has said that have not all
 23 been put to you.
 24 He on arrival introduced himself and who he was with
 25 to the present officers; is that right?

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1 **A. Yes, that would be correct.**
 2 Q. And asked whether or not you had made your stage 4
 3 accounts?
 4 **A. I can't recall that. I can't recall what was said**
 5 **really at the meeting.**
 6 Q. Can you recall whether he expressed any concern about
 7 the fact that those accounts hadn't yet been taken?
 8 **A. I can't recall, and I don't know whether that is what**
 9 **triggered us doing our statements the next day.**
 10 **I couldn't say.**
 11 Q. His view appears to be that as soon as that had been
 12 established, the meeting ended very quickly?
 13 **A. It wasn't a long meeting, like I say. I think they came**
 14 **in, had a brew, waited for people to get together and**
 15 **then, you know, it was a quick chat.**
 16 Q. Thank you.
 17 Finally, in answer to some questions from Mr Thomas,
 18 you said that you were no more concerned about Mr Totton
 19 than the others once in the car park. Do you remember
 20 those questions?
 21 **A. Yes, that's correct.**
 22 Q. I would just like to explore that very briefly with you.
 23 **A. Yes.**
 24 Q. Is part of reason for that because you thought you were
 25 dealing with people conspiring with one another to

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1 commit a serious offence?
 2 **A. That is correct. As far as I was concerned, they are**
 3 **all dangerous individuals.**
 4 Q. Is part of the reason because if they are conspiring
 5 with one another and they are all in a car, they
 6 represent a collective threat?
 7 **A. Yes, that's correct.**
 8 Q. Is part of the reason because whatever you are told in
 9 a briefing, you have to react to what you see and hear
 10 on the ground?
 11 **A. Yes, that's correct.**
 12 Q. You might have somebody on paper who you are told is
 13 extremely dangerous, who is extremely compliant upon
 14 being issued with a command?
 15 **A. Yes, that's correct.**
 16 Q. In contrast, you might have someone with no previous
 17 convictions who wilfully disobeys a police command?
 18 **A. Yes, that is correct.**
 19 Q. Is that your experience as a firearms officer?
 20 **A. That is my experience, yes.**
 21 MS WHYTE: Thank you very much.
 22 Thank you sir.
 23 THE CHAIRMAN: Any further questions, Mr Beer?
 24 MR BEER: Just a few, sir.
 25

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1 Further questions from MR BEER
 2 MR BEER: If it is your view that the subjects in a briefing
 3 are referred to as believing to be conspiring to commit
 4 a robbery --
 5 **A. Yes, sir.**
 6 Q. -- present a collective threat --
 7 **A. Yes, sir.**
 8 Q. -- and that therefore each is as dangerous as each
 9 other --
 10 **A. At the point of contact, yes, sir.**
 11 Q. -- why are you briefed about them individually?
 12 **A. It is just to give you, you know, what the past history**
 13 **is, what their capability is.**
 14 Q. But why, if they are all as dangerous as each other?
 15 **A. I couldn't say, how the templates get -- how the format**
 16 **and the briefing gets put like that.**
 17 Q. Just have a think about it, if they are all as dangerous
 18 as each other, why are you given photographs,
 19 approximate ages, heights, build and then
 20 an intelligence picture about each of them individually?
 21 **A. So you were aware if you ended up confronting that**
 22 **individual, I would imagine.**
 23 Q. But why? If they are all as dangerous as each other,
 24 why don't you just lump them all together?
 25 **A. Well if one has got a warning for say having a knife in**

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1 **his pocket, I would want to know that, wouldn't I?**
 2 Q. Because you would treat him individually differently to
 3 the others?
 4 **A. If I was to recognise him.**
 5 Q. The second thing I wanted to ask about is you were asked
 6 by Mr Davies about whether conducting a hard stop on a
 7 road when a vehicle is moving --
 8 **A. An enforced stop, yes.**
 9 Q. -- is intrinsically dangerous. I think you agreed with
 10 that?
 11 **A. Yes.**
 12 Q. You said that therefore in order to stop a vehicle such
 13 as this from travelling to Culcheth, you would have to
 14 find a moment on the journey where it came to a natural
 15 rest?
 16 **A. Yes, I mean --**
 17 Q. Like to a roundabout?
 18 **A. Yes, something like that, slow moving traffic, it is**
 19 **held in traffic. There are various things we can do**
 20 **with that, and that is why I was saying that you could**
 21 **be on Amber for 45 minutes.**
 22 Q. Yes, because you want to pick your moment?
 23 **A. Yes.**
 24 Q. That progress of stopping a vehicle on a journey is not
 25 itself intrinsically dangerous?

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1 **A. It all depends on the layout of where you are going and**
 2 **the nature and, you know, like the surveillance would be**
 3 **saying like, "We are passing a school now", so then the**
 4 **alpha 1 would pick up on that and think, "Right, we are**
 5 **not doing it here". So it all depends on the area.**
 6 Q. The reason for asking is, do you remember I showed you
 7 the briefing for 2 March --
 8 **A. Yes.**
 9 Q. -- which --
 10 **A. Was that the one stop prior to getting to Culcheth?**
 11 Q. Yes?
 12 **A. Yes, sir, I do remember that.**
 13 Q. That was pretty clear on the face of the briefing, the
 14 plan?
 15 **A. On the 2nd, it was, sir, yes.**
 16 Q. I think you agreed with me earlier that you didn't put
 17 your hand up and say:
 18 "Hold on, why are we doing this? This is not the
 19 right thing to do. It is intrinsically dangerous to try
 20 and stop the vehicle from getting to Culcheth."
 21 **A. What they might have meant by stopping it getting to**
 22 **Culcheth is on the way to Culcheth, if we have got an**
 23 **opportunity to get it stopped, you know, where it is**
 24 **safe to do so, then that is the intention, but it is**
 25 **like when they set tactical parameters and stuff with**

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<p>1 that. Even though we might be sat there thinking, hold</p> <p>2 on, he is not allowed to get to Culcheth, he has gone</p> <p>3 there, I don't know if there has been an intelligence</p> <p>4 update, you know, to the SFC why that has not happened.</p> <p>5 So it wouldn't be unusual, you know, that you hear</p> <p>6 something on a briefing and think, "Hold on, we have got</p> <p>7 to stop them before they get to Culcheth", and then we</p> <p>8 are sat there just waiting up and think, "Hold on, they</p> <p>9 are laid up in Culcheth, why haven't we struck?"</p> <p>10 You know, there might have been intelligence changed</p> <p>11 with that, sir, so ...</p> <p>12 Q. The third topic, please, if you can take out your bundle</p> <p>13 at tab 2 and look at the second page of the witness</p> <p>14 statement.</p> <p>15 A. The statement of the 9th, sir?</p> <p>16 Q. Yes, that is it.</p> <p>17 A. Yes, sir.</p> <p>18 Q. Page 2, about 10 lines from the bottom or eight lines</p> <p>19 from the bottom, you say:</p> <p>20 "I have my weapon on aim at the male [this is</p> <p>21 Mr Totton, yes] shouting 'Armed police, show me your</p> <p>22 hands'."</p> <p>23 About six lines from the bottom.</p> <p>24 A. Yes, that's correct, sir.</p> <p>25 Q. "The male, while I was saying this, immediately lay on</p> <p style="text-align: center;">Page 177</p>	<p>1 A. Yes, sir?</p> <p>2 Q. -- use of the word "tactic," to describe the MASTS</p> <p>3 platform was borne of linguistic convenience and that it</p> <p>4 was easier to say the word "tactic" than it was</p> <p>5 "a platform which led to other outcomes potentially",</p> <p>6 yes?</p> <p>7 A. Yes.</p> <p>8 Q. Do you remember yesterday I asked you what your</p> <p>9 understanding of MASTS was other than it meaning mobile</p> <p>10 armed support --</p> <p>11 A. I remember you asking, I can't recall what --</p> <p>12 Q. I think you immediately said it is a platform.</p> <p>13 A. Yes. After this incident, we did recall, is it armed</p> <p>14 support to covert operations or something along those</p> <p>15 lines. I know it is a lot more flexible than when</p> <p>16 I first started the MASTS platform.</p> <p>17 MR BEER: Yes, thank you very much.</p> <p>18 They are the questions that I ask.</p> <p>19 A. Okay, sir.</p> <p>20 THE CHAIRMAN: Before we take a break, which we are about to</p> <p>21 do and you will be finishing your evidence at that</p> <p>22 point.</p> <p>23 A. Yes, sir.</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 179</p>
<p>1 the floor face down."</p> <p>2 Yes?</p> <p>3 A. Yes, he was going down to the floor and then eventually</p> <p>4 lay down, yes.</p> <p>5 Q. "Near to the rear of the red Audi I could see his right</p> <p>6 hand was empty facing down."</p> <p>7 Yes?</p> <p>8 A. Yes, that's correct.</p> <p>9 Q. Your command was "Show me your hands"?</p> <p>10 A. Yes.</p> <p>11 Q. He disobeyed your command and lay down?</p> <p>12 A. Yes, he was doing it as I was shouting it. Yes, he was</p> <p>13 going straight down.</p> <p>14 Q. You were just asked some questions earlier on the basis</p> <p>15 that he had complied with your instructions. He didn't,</p> <p>16 did he? You said "show me your hands" and he laid down.</p> <p>17 A. Well, as he was going down it was one movement and then,</p> <p>18 you know, I saw his right hand first and then I have</p> <p>19 seen his left one.</p> <p>20 Q. So he didn't show you both of his hands?</p> <p>21 A. No, he didn't turn round and show me both of his hands.</p> <p>22 He just carried on straight to the floor and then</p> <p>23 showed.</p> <p>24 Q. Lastly, Ms Whyte I think put to you the suggestion that</p> <p>25 other officers, not you --</p> <p style="text-align: center;">Page 178</p>	<p>1 Questions from THE CHAIRMAN</p> <p>2 THE CHAIRMAN: Can I just ask you this, when the OFC wants</p> <p>3 to transmit to the other firearms officers in other</p> <p>4 vehicles by radio, does he have to press a button or is</p> <p>5 there a channel that is open all the time.</p> <p>6 A. He would have is to -- whether he has a handheld in the</p> <p>7 car or whether he has a car set with the handheld press</p> <p>8 all. So he would have to press something.</p> <p>9 THE CHAIRMAN: Press something and hold it down to keep it</p> <p>10 open?</p> <p>11 A. Yes.</p> <p>12 THE CHAIRMAN: When he said "Strike, strike" was that just</p> <p>13 to the occupants of alpha car or was he transmitting it</p> <p>14 by radio simultaneously to the other firearms cars as</p> <p>15 well?</p> <p>16 A. Well I couldn't say whether they heard it or whatever,</p> <p>17 but from training and how I have been on different jobs</p> <p>18 they would press and shout "Strike, strike, strike" so</p> <p>19 all the cars get it, because you might have to abort</p> <p>20 last minute.</p> <p>21 THE CHAIRMAN: Thank you.</p> <p>22 Anybody want to ask anything arising out of that?</p> <p>23 Thank you very much. That is the end of your</p> <p>24 evidence, thank you for helping the Inquiry.</p> <p>25 A. No problem, sir.</p> <p style="text-align: center;">Page 180</p>

<p>1 THE CHAIRMAN: Mrs Shaw will now take you away and we will 2 take a break of five minutes. 3 Will that be enough to make arrangements for the 4 next witness? 5 (3.45 pm) 6 (A short adjournment) 7 (3.55 pm) 8 MR BEER: Q9, please, sir. 9 Q9 (sworn) 10 THE CHAIRMAN: Would you mind remaining standing, Mr Q9, 11 thank you. 12 Questions from MR BEER 13 MR BEER: Q9, my name is Jason Beer and I ask questions on 14 behalf of the Inquiry. To your left-hand side there 15 should be a cypher sheet -- 16 A. Yes. 17 Q. -- on which are a number of names, including your own, 18 and the cyphers corresponding to them are other officers 19 that benefit from anonymity orders. 20 If you wish to refer to any other officers, please 21 use the sheet to check to see if they have anonymity or 22 not? 23 A. Yes, okay. 24 Q. Secondly in front of you there, there should be a binder 25 which is in your name. If you take it out please,</p> <p style="text-align: center;">Page 181</p>	<p>1 THE CHAIRMAN: I am aware of the bundle, you mean, yes. 2 You can carry on if you like. 3 MR BEER: Thank you, sir. 4 Can you see that is said to be a record of 5 interview, yes? 6 A. Yes, sir. 7 Q. Between pages 1 to 66, is that a record of an interview 8 of you on 10 April 2012? 9 A. Yes. 10 Q. Then from page 67 to page 157, is that a record of 11 interview of you on 13 June 2012? 12 A. Yes. 13 Q. Are the contents of the initial account, the two-page 14 document, the witness statement of 9 March and the 15 answers that you gave under caution in those two 16 interviews true to the best of your knowledge and 17 belief? 18 A. They are, sir, yes. 19 Q. Thank you. 20 Can I start then with your qualifications and 21 experience. When did you first become a police officer? 22 A. The end of 1991. 23 Q. Are you still serving? 24 A. Yes, I am, sir. 25 Q. What was your rank in March 2012?</p> <p style="text-align: center;">Page 183</p>
<p>1 I want to ask you whether some of the contents of it are 2 accurate and true. 3 Can we start, please, with tab 2 of the binder. 4 Can we see there a two-page document in handwriting? 5 A. Yes. 6 Q. Is that an account that you gave on the night of 3 March 7 into the morning of 4 March 2012? 8 A. It is, sir, yes. 9 Q. Secondly, if we can go back to tab 1, please, can you 10 see a witness statement dated 9 March 2012? 11 A. Yes, sir. 12 Q. Is that your witness statement? 13 A. Yes. 14 Q. Then, thirdly, if you can take out bundle B -- 15 THE CHAIRMAN: This is the general firearms bundle, is it? 16 MR BEER: Yes, I don't think it is in Q9's own bundle, it is 17 B. 18 THE CHAIRMAN: Do you mean tab B in his own bundle? 19 MR BEER: No, bundle B. 20 THE CHAIRMAN: Sorry, my fault. 21 MR BEER: Thank you. 22 Sir, I think you may have your bundle B on your 23 desk. 24 THE CHAIRMAN: It is not this one. 25 MR BEER: From recollection yours was a slim black folder.</p> <p style="text-align: center;">Page 182</p>	<p>1 A. I was a constable. 2 Q. Does that remain the case? 3 A. Yes, sir. 4 Q. What was your role in March 2012? 5 A. I was a specialist firearms officer. 6 Q. When did your career as an AFO begin? 7 A. In November 2005. 8 Q. You had been an AFO for six years and three months -- 9 A. Around that time, yes, sir. 10 Q. -- by the time of this incident on 3 March 2012? 11 A. Yes, sir. 12 Q. Were you qualified to participate in a MASTS operation? 13 A. Yes, sir. 14 Q. When did you first become so qualified? 15 A. I believe it was September 2006. 16 Q. You had been undertaking MASTS operations, is this 17 right, for about five years and six months -- 18 A. Yes, sir. 19 Q. -- before this incident? 20 A. Yes, sir. 21 Q. Did you undergo periodic refresher training in MASTS? 22 A. Yes, sir. 23 Q. Can we look in your binder, please, at tab 4. Can I do 24 this in reverse order, from the date of the incident 25 backwards. If you go to page 803, first.</p> <p style="text-align: center;">Page 184</p>

46 (Pages 181 to 184)

<p>1 A. Yes, sir. 2 Q. This is your EFire record, I think. 3 A. Okay. 4 Q. Look backwards from 3 March 2012. The first refresher 5 training before then that I can see is on 6 30 November 2011, can you see that? 7 A. Yes, sir. 8 Q. Was that a day's course, 480 minutes? 9 A. It will have been, yes, sir. 10 Q. Then the one before that, can you see second entry on 11 the top of the page, on 14 April 2011? 12 A. Yes, sir. 13 Q. 330 minutes, yes? 14 A. Yes. 15 Q. Then if you go back a page, so about the middle of the 16 page just between the hole-punches, 23 November 2010, 17 yes, 510 minutes? 18 A. Yes. 19 Q. 23 November 2010, yes? 20 Then back a page, please, to page 799, can you see 21 that there is one on 10 May, about 10 entries from the 22 bottom? 23 A. Yes, sir. 24 Q. I think that is something else actually isn't it, where 25 it says "MASTS/DADA", D-A-D-A is a deadly and determined</p> <p style="text-align: center;">Page 185</p>	<p>1 operational traces exercises, which is -- 2 Q. Sorry, say that again? 3 A. There would have been more operational traces MASTS 4 training exercises. 5 Q. Just describe for us what those are, please. 6 A. That is a three-day exercise with each of the counter 7 terrorist hubs from the counter terrorist hub, but 8 working with the difference forces within the region. 9 Q. Did that include a MASTS element to it? 10 A. That was a MASTS exercise. Working with counter 11 terrorist surveillance teams rather than crime 12 surveillance teams. 13 Q. We have heard evidence, in fact just heard evidence from 14 your colleague W9 -- 15 A. Yes. 16 Q. -- that MASTS was not a tactic and ought not to be 17 referred to as a tactic, would you agree with that? 18 A. Yes, sir. 19 Q. Because that would wrongly imply or may wrongly imply 20 that it had as a necessary or planned conclusion, 21 whereas it was equally likely that a decision could be 22 taken to undertake disruption or mitigation activity, to 23 do nothing, to develop intelligence, to continue 24 surveillance. 25 A. Yes, that's correct, sir.</p> <p style="text-align: center;">Page 187</p>
<p>1 attack, is it? 2 A. It involves both tactics, yes, sir. 3 Q. Your refresher training I think, the spring refresher 4 training, looks to have been on 10 March 2010, can you 5 see that, right between the hole-punches? 6 A. The -- I've got the 11 March 2010, sir. 7 Q. Yes. Did I say something different? 8 THE CHAIRMAN: You said 10th. 9 MR BEER: My mistake. 10 Then if you go back a page still further, to 11 page 797, about 10 lines from the bottom, 12 24 August 2009, MASTS, TFU, yes? 13 A. Yes, sir. 14 Q. Then 30 April 2009, about 10 lines from the top, MASTS 15 TFU? 16 A. Yes, sir. 17 Q. It would look from that that you did some refresher 18 training in the spring and some refresher training in 19 the autumn. Is that about right? 20 A. Yes, sir. 21 Q. In each of the years 2009, 2010, 2011? 22 A. Yes. 23 Q. Does that fit with your recollection of the cyclical 24 nature of MASTS refresher training? 25 A. Yes, sir, just on top of that there would have been more</p> <p style="text-align: center;">Page 186</p>	<p>1 Q. It didn't necessarily result in some form of decisive 2 action? 3 A. Not all the time, no, sir. 4 Q. No. 5 Just look in your bundle, please, at tab 1. 6 You say in the fourth paragraph of this witness 7 statement, of 9 March: 8 "I qualified in the mobile armed support to 9 surveillance tactic in September 2006." 10 If what you have just said is right that it ought 11 not to be referred to as a tactic because of the 12 implications that that carries with it -- 13 A. Yes, sir. 14 Q. -- why did you refer to it as a "tactic"? 15 A. I am not sure, sir. 16 Q. Just look at bundle B, the interview bundle, B/40. Do 17 you have B/40? 18 A. Yes, sir. 19 Q. This is your first interview, your April interview. 20 I am looking at the answer at the foot of the page, you 21 say: 22 "You need to put the strongest team out to deal 23 with, you know, the threat that these people pose so 24 they do look at experience. They wouldn't -- if there 25 was someone new to the MASTS tactic ..."</p> <p style="text-align: center;">Page 188</p>

<p>1 Do you see you refer to it there as a tactic as 2 well? 3 A. Yes, sir. 4 Q. Again, would that be the same answer, that you don't 5 know why you were calling it a tactic then given what 6 you have just told us now? 7 A. I was speaking in layman's terms to the persons who were 8 interviewing me, because they didn't know a great deal 9 about firearms. 10 Q. You think that is the reason that you called it 11 a tactic? 12 A. Yes, sir. 13 Q. Again, if we can go back to the other bundle, your 14 bundle and look in tab 2, please, your initial 15 handwritten account, yes? 16 A. Yes, sir. 17 Q. We are going to come back to this in more detail in 18 a moment. In the third line, you say: 19 "We were briefed about the suspect vehicle to be the 20 subject of a MASTS strike." 21 A. Yes, sir. 22 Q. Is there such a thing as a "MASTS strike"? 23 A. It is a vehicle strike. 24 Q. Do you agree that that line there in particular may 25 suggest that you at least thought that "MASTS" equals</p> <p style="text-align: center;">Page 189</p>	<p>1 September 2006 and before March 2012? 2 A. Probably in excess of 100, sir. 3 Q. By authorisation and deployments, I mean that 4 an authority had been granted by an SFC and you had 5 attended a briefing? 6 A. Yes, sir. 7 Q. That is still the answer is the same, yes? 8 A. Yes, sir. 9 Q. Of those deployments, how many of them had resulted in 10 some form of decisive action? 11 A. I would estimate probably 15, 15 to 20. 12 Q. In any of those had you discharged a weapon? 13 A. No. 14 Q. I think you were also qualified in the use of special 15 munitions; is that right? 16 A. Yes, sir. 17 Q. Was that the CSDC and the shotgun? 18 A. Yes, and distraction devices. 19 Q. The shotgun, was that in the tyre deflation and RIP -- 20 A. Yes, sir. 21 Q. -- modules? 22 A. Yes, sir. 23 Q. Of the MASTS operations on which you were deployed, in 24 what rough proportion were special munitions also 25 authorised for deployment?</p> <p style="text-align: center;">Page 191</p>
<p>1 "strike"? 2 A. No, sir. A strike is, you know, a possible outcome from 3 a MASTS operation. 4 Q. MASTS does not equal strike at all, does it? 5 A. No. 6 Q. There is actually no such a thing as a MASTS strike? 7 A. No. 8 Q. I think you also underwent armed interception training 9 in May 2007; is that right? 10 A. Yes, sir. 11 Q. Hostage rescue and dynamic intervention training in 12 November 2007? 13 A. Yes. 14 Q. You were a firearms instructor and a CQC live fire 15 instructor? 16 A. Yes, sir. 17 Q. Just tell us what CQC live fire instructor involved? 18 A. It is close quarter combat in a -- I can describe as 19 a range where there is dynamic movement, 360 degrees, 20 and it is firing live rounds. 21 Q. Could I turn then from your qualifications to your 22 experience. 23 A. Yes, sir. 24 Q. On how many deployments do you think you had been 25 engaged which were using the MASTS platform since</p> <p style="text-align: center;">Page 190</p>	<p>1 A. I would say probably about 30 per cent. 2 Q. Of that 30 per cent, so about 30 -- 3 A. Yes. 4 Q. -- on how many occasions had the special munitions been 5 used? 6 A. I would estimate half of those. 7 Q. Does that equate to the 15 strikes? 8 A. No, sir. 9 Q. No? 10 Had you personally used special munitions before on 11 a deployment? 12 A. I have used it on a building deployment. 13 Q. Before 3 March, had you ever used a firearm to shoot 14 another person? 15 A. No. 16 Q. Was this therefore the first time that you had fired 17 a weapon at a person? 18 A. Yes. 19 Q. Can I turn to some knowledge that you may have had of 20 some of the subjects of Operation Shire before 21 Operation Shire began. 22 You say in the interviews that you gave in April and 23 June that you had some previous knowledge of 24 Anthony Grainger. 25 A. Yes, sir.</p> <p style="text-align: center;">Page 192</p>

<p>1 Q. Some four years before 2012 in 2008, in the context of 2 an operation called Operation Blythe. Is that right? 3 A. Yes, sir. 4 Q. Can we just look at that in your interview bundle, 5 please. 6 B/29, please. 7 A. Yes, sir. 8 Q. At the foot of the page, you were asked the question by 9 the interviewer: 10 "In terms of Anthony Grainger, what did you know 11 about Anthony Grainger?" 12 You say: 13 "The first thing with Anthony Grainger was in 2008, 14 I was on the firearms planning team and we were tasked 15 to put together a plan as Serious Organised Crime Agency 16 were looking into Grainger. The information was that he 17 was involved with Gary Knox and Francis Hunt in the 18 supply of drugs and firearms, which were in a premises 19 on Albert Road in Bury. Because of the nature of the 20 threat posed by these individuals they wanted a quick 21 reaction force in and any officers which were deployed, 22 surveillance officers which were deployed. There was 23 also a MASTS team on that operation, it was Operation 24 Blythe in 2008." 25 Yes?</p> <p style="text-align: center;">Page 193</p>	<p>1 the Operation Shire. 2 Q. What do you mean, back in the December? 3 A. In -- I think it was January when he first came to my 4 attention. 5 Q. It wasn't just in March that this rang a bell? 6 A. No. 7 Q. It was when you had your first deployment on Op Shire, 8 which I think was 26 January? 9 A. The first deployment when Anthony Grainger featured as 10 a subject. 11 Q. Are you saying that something did click then, four years 12 later. Is that right? 13 A. Yes, Operation Blythe was one of the first operations 14 I had planned as a member of the planning or the 15 resource planning and tasking team as it was then, the 16 operations team. 17 Q. I don't think there is any reference to this in your 18 initial account, is there. If we just go back to your 19 binder, tab 2. I suspect you may say that is not the 20 purpose of an initial account -- 21 A. Yes, sir. 22 Q. -- the purpose of an initial account is to say what went 23 on on the day, yes -- 24 A. Yes, sir. 25 Q. -- and not about your pre-knowledge of one of the</p> <p style="text-align: center;">Page 195</p>
<p>1 A. Yes, sir. 2 Q. I think you were saying two things there. 3 That you were part of a planning team for some 4 contingencies to enter some residential premises. Is 5 that right? 6 A. Yes, sir. 7 Q. And that you were part of a QRF, a quick reaction force? 8 A. Yes, sir. 9 Q. In fact, is this right, that nothing happened on that 10 deployment in terms of your participation in it. It 11 didn't result in an arrest or a strike involving you? 12 A. No, sir. 13 Sorry, can I just -- the premises was not on 14 Albert Road, it was Outward Road. 15 Q. Oh right, that is a typo is it? 16 A. I think it is just from the transcript, it is 17 probably -- 18 THE CHAIRMAN: Outward? 19 A. Outward Road, yes. 20 MR BEER: When it came to 2 and 3 March 2012 -- 21 A. Yes. 22 Q. -- did you remember this operation involving Mr Grainger 23 that had happened four years previously when you were 24 being briefed up in Operation Shire? 25 A. I think I remembered Anthony Grainger at the outset of</p> <p style="text-align: center;">Page 194</p>	<p>1 subjects? 2 A. Yes, sir. 3 Q. If we go back a tab, though, to tab 1, we can see that 4 you have then made a seven-page witness statement, yes? 5 A. Yes, sir. 6 Q. Which does go beyond setting out an account of what 7 happened on the day, doesn't it, or the night of 8 3 March? 9 A. Yes, sir. 10 Q. It includes references to your previous knowledge, as 11 you said it was, of the subjects of Operation Shire. If 12 you look in particular at page 268, which is the third 13 page, on the fourth paragraph: 14 "It was within my knowledge that this group of 15 offenders were in some way linked to ..." 16 Then you set something out, yes? 17 A. Yes, a bank robbery in Bolton. 18 Q. Yes. So in this statement you are giving a much fuller 19 account, which is not restricted to the events of 20 3 March, yes? 21 A. The reason I have put that in is because it is relevant 22 to the actual conversation we had at Leigh police 23 station. 24 Q. You, I think, are anticipating my questions, Q9. 25 A. Sorry.</p> <p style="text-align: center;">Page 196</p>

1 Q. That is all right. Why didn't you include in this
 2 an account of your previous knowledge of Mr Grainger?
 3 **A. Because that wasn't mentioned during Operation Shire**
 4 **when we were at Leigh police station.**
 5 Q. But by then you knew that you had shot this man --
 6 **A. Yes, sir.**
 7 Q. -- dead.
 8 **A. Yes, sir.**
 9 Q. Yes?
 10 You were, I think, setting out in this witness
 11 statement an account of what you had been told and what
 12 you knew about him, yes?
 13 **A. Yes, sir.**
 14 Q. Was the reason that you didn't set out in this
 15 seven-page account your previous knowledge of him
 16 through Operation Blythe, that by the time that you came
 17 to be interviewed, you had conducted some research about
 18 Anthony Grainger?
 19 **A. No, sir.**
 20 Q. And that you were improving the intelligence case that
 21 you said that you acted upon when you shot him?
 22 **A. No, sir.**
 23 Q. If we go back to B/29 to 30, please. We can see you set
 24 out Mr Grainger's name, unsurprisingly, but then two
 25 other people alleged to have been involved, Gary Knox

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1 and Francis Hunt, don't you?
 2 **A. Yes, sir.**
 3 Q. You give an address by reference to the road in Bury.
 4 **A. Yes, sir.**
 5 Q. How were you able to recall that detail four years on?
 6 **A. Like I said, it was the first operation that I planned**
 7 **in the RPT, as it was, and those are prominent criminals**
 8 **who I dealt with. And because of the nature of the plan**
 9 **we put together, it was quite significant.**
 10 Q. Why, again, didn't you mention it in the witness
 11 statement back on 9 March, if it was quite significant?
 12 **A. I don't know, sir.**
 13 Q. Did you take this knowledge of an operation four years
 14 previously into account on 3 March?
 15 **A. No, sir.**
 16 Q. So in fact it is an irrelevant mention of a previous
 17 operation?
 18 **A. It seems to be, yes, sir.**
 19 Q. Thank you.
 20 Can I turn then to Operation Shire.
 21 Before doing so, in fact I think it is right that
 22 you yourself had no personal dealings before 3 March
 23 with Anthony Grainger?
 24 **A. No, sir.**
 25 Q. You had not arrested him or otherwise come into contact

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1 with him?
 2 **A. No.**
 3 Q. Turning to Operation Shire, then. When was your first
 4 awareness of Operation Shire?
 5 **A. I think it was 15 December.**
 6 Q. Was that a deployment of other members of the TFU, not
 7 you?
 8 **A. I think I was deployed on -- or I was on that**
 9 **deployment.**
 10 Q. On 15 December?
 11 **A. I think so, yes, sir.**
 12 Q. You said in interview that, if we turn it up, please, at
 13 page B/22, can you see at the second half of B/22 you
 14 say:
 15 "My first knowledge of Shire started with
 16 a discussion with a colleague in the office where
 17 surveillance had been in and give us information of some
 18 of the subjects from the organised crime group relating
 19 to Shire being in a stolen vehicle in the Cheadle area
 20 and they were recce-ing banking premises. That was on
 21 Cheadle High Street and that was December 2011.
 22 I wasn't involved, however there was an operation put
 23 together by the tactical firearms tactical operations
 24 team and they ran MASTS on the back of the surveillance
 25 operation."

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1 Yes?
 2 **A. Yes, sir.**
 3 Q. Then the interviewer asks you:
 4 "Do you know how many deployments there actually
 5 were in Op Shire?"
 6 You say:
 7 "from December no. I know they put a deployment
 8 together, I don't know how many times."
 9 He says:
 10 "But you were not involved in any previous
 11 deployment?"
 12 You say:
 13 "No, that is just what I was aware of. I was
 14 involved in different training and stuff like that so
 15 I was aware of the operation and aware of what the
 16 subjects had, you know, done, I didn't know which
 17 subjects specifically were involved."
 18 Then you say:
 19 "But I was aware of it, you know, the subjects were
 20 involved in a recce of a banking premises in Cheadle,
 21 next time, the next time I was involved was
 22 in January 2012, that was 26 January."
 23 You appear to be saying there that you were not
 24 involved in the deployment in December 2011.
 25 **A. Yes, obviously when I have been interviewed I have**

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<p>1 forgotten that I was on deployment on 15 December.</p> <p>2 Q. Does that indicate that certainly in March 2012 you</p> <p>3 forgot what you had been told when you were part of the</p> <p>4 deployment on 15 December 2011?</p> <p>5 A. No.</p> <p>6 Q. You hadn't forgotten what you had been told?</p> <p>7 A. Sorry, just say the question again?</p> <p>8 Q. I will ask the question again.</p> <p>9 We know that you did attend the briefing on</p> <p>10 15 December 2011.</p> <p>11 A. Yes.</p> <p>12 Q. When you were interviewed here in March 2012, you had</p> <p>13 forgotten that you were actually on the deployment, you</p> <p>14 were saying, "I was not involved on the deployment,</p> <p>15 I just knew that some people were planning it".</p> <p>16 A. I must have forgotten then.</p> <p>17 Q. Yes.</p> <p>18 You say at B/23 there:</p> <p>19 "I didn't know which subjects specifically were</p> <p>20 involved."</p> <p>21 Given that answer, would you agree that anything</p> <p>22 that you did learn on 15 December 2011 couldn't really</p> <p>23 play a part in your reasoning on 3 March 2012?</p> <p>24 A. I agree, yes.</p> <p>25 Q. Thank you.</p> <p style="text-align: center;">Page 201</p>	<p>1 be said by way of the PowerPoint. Can we see you</p> <p>2 identified at the bottom of 317 as, "Q9 intended to be</p> <p>3 present"?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Yes?</p> <p>6 In terms of the subjects, if you look please at</p> <p>7 page 325, 327 and 329, we can see Messrs Totton, Rimmer</p> <p>8 and Grainger as three of the subjects, yes?</p> <p>9 A. Yes.</p> <p>10 Q. Then if you carry on looking and go to 355. We can see</p> <p>11 that a fourth subject, also known as subject 1, is</p> <p>12 Aaron Corkovic.</p> <p>13 Jamie Corkovic, who is subject 5 but referred to as</p> <p>14 subject 2, has a threat assessment for him.</p> <p>15 Subject 6, who is shown as subject 3, is</p> <p>16 Anthony Corkovic.</p> <p>17 Subject 7, shown as subject 4, is Adam Brown.</p> <p>18 Then there is somebody called an associate, who is</p> <p>19 Paul Corkovic. Yes?</p> <p>20 A. Yes, sir.</p> <p>21 Q. So there were differences between the seven subjects</p> <p>22 shown in this operation, because there were three</p> <p>23 Corkovics and a Brown, than the operations on 2 and</p> <p>24 3 March 2012?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 203</p>
<p>1 Can we move forward then to the end of January 2012.</p> <p>2 You were a part of the deployment on</p> <p>3 26 January 2012?</p> <p>4 A. Yes, sir.</p> <p>5 Q. I think you were present at a briefing given by</p> <p>6 Superintendent Ellison and G1, yes?</p> <p>7 A. Yes, sir.</p> <p>8 Q. The TFC and the OFC respectively; is that right?</p> <p>9 A. Yes. Yes.</p> <p>10 Q. I think the subjects were then different, weren't they,</p> <p>11 do you recall that? Than on 2 and 3 March?</p> <p>12 A. I think the subjects were the same. The main three</p> <p>13 subjects and there was other subjects involved.</p> <p>14 Q. Maybe if we look, in fairness to you, at the general</p> <p>15 bundle at tab 11. That is volume 1, tab 11.</p> <p>16 Do you have that, the general bundle, tab 11?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Can you see that this is a PowerPoint presentation dated</p> <p>19 26 January 2012, yes? I think you are looking ahead,</p> <p>20 just wait a moment.</p> <p>21 A. Sorry.</p> <p>22 Q. That is all right.</p> <p>23 We don't have the recording of this, even though it</p> <p>24 was supposed to be a recorded briefing, so we cannot see</p> <p>25 exactly what was said, but we have what was intended to</p> <p style="text-align: center;">Page 202</p>	<p>1 Q. If you go back in that tab, tab 11, to page 319, can you</p> <p>2 see what the intelligence case was? It says:</p> <p>3 "The subjects of the operation are believed to be</p> <p>4 engaged in armed robberies in the north-west region ..."</p> <p>5 And then:</p> <p>6 "Further updates from TFC sponsor ..."</p> <p>7 A. Yes, sir.</p> <p>8 Q. So there is no PowerPoint presentation of what the</p> <p>9 intelligence was, yes?</p> <p>10 Can you now recall what the intelligence as outlined</p> <p>11 to you was on 26 January?</p> <p>12 A. The only thing I can recall is it was to do with a cash</p> <p>13 in transit depot down in Stoke.</p> <p>14 Q. But that is it, yes?</p> <p>15 A. Pretty much, yes.</p> <p>16 Q. Was it usual for you to be deployed on an investigation</p> <p>17 on which there were several deployments?</p> <p>18 A. Yes, sir.</p> <p>19 Q. What approach did you take to intelligence that was</p> <p>20 given to you, say, on briefings 1 and 2, when you were</p> <p>21 on deployment 10 of the operation?</p> <p>22 A. You would bear in mind pertinent things of the briefing,</p> <p>23 sometimes the intelligence may change.</p> <p>24 Q. What regard if any would you have to, in my example,</p> <p>25 an operation that had 10 deployments, spread over four</p> <p style="text-align: center;">Page 204</p>

1 or five months, you had been there for 1 and 2 and then
 2 you came back into it on 10. How would you treat the
 3 intelligence that you had been given on 1 and 2?
 4 **A. It depends how that intelligence had changed.**
 5 Q. Would you consciously think, "Hold on, I was given some
 6 intelligence, I can remember the intelligence from three
 7 or four months ago, I am going to think how it has
 8 changed from now"? Or would you go on the intelligence
 9 that you were given on the day that you were deploying?
 10 **A. You would work on the intelligence you were given on the**
 11 **day you deployed.**
 12 Q. Is that because, as you just said, intelligence changes
 13 over time?
 14 **A. Yes, sometimes it develops. Yes, sir.**
 15 Q. So by "development" you mean that there can be fresh
 16 intelligence?
 17 **A. Yes, sir.**
 18 Q. That fresh intelligence can tell you about past
 19 intelligence, about whether it is accurate or not, yes?
 20 **A. Yes, sir.**
 21 Q. And indeed intelligence that was previously regarded as
 22 reliable may become unreliable, or vice versa?
 23 **A. I wouldn't expect reliable intelligence to become**
 24 **unreliable.**
 25 Q. Really, I mean to take an example, if somebody had given

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1 some intelligence that X was believed to be involved in
 2 a robbery, yes?
 3 **A. Yes.**
 4 Q. That was coming up, was planned, and X was in fact in
 5 prison at that time -- in fact that is this case -- that
 6 if that was discovered might think that the intelligence
 7 that has been given is not reliable?
 8 **A. In that case, yes, sir.**
 9 Q. Yes.
 10 By March 2012, were you aware that Operation Shire
 11 had been split into two operations or two strands?
 12 **A. No, sir.**
 13 Q. That might be a reason why it would be perhaps dangerous
 14 to rely on a previous briefing, mightn't it? That
 15 an operation had changed shape, had changed direction,
 16 and, in this case, had been split as we know from
 17 DI Cousen into two, yes?
 18 **A. Possibly, yes, sir.**
 19 Q. Let's take an example from your interview. If we look
 20 at B/29, please, can you see at 28.04, at the foot of
 21 the page on B/28 --
 22 **A. Yes.**
 23 Q. It says:
 24 "During that briefing [you are here talking about
 25 the 26 January briefing] like I say, there were other

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1 subjects involved and one in particular which struck me
 2 from previous knowledge, policing knowledge, going back
 3 to the mid 1990s, Paul Corkovic, he was mentioned on the
 4 briefing as [over the page] part of the OCG as well.
 5 And I can only remember his previous, three sons because
 6 they were all the same surname. With Corkovic, he was
 7 heavily involved in armed robberies in the mid 1990s.
 8 I know from my previous work experience from where
 9 I worked in the mid 1990 that I was aware of
 10 an operation where a team of armed robbers had been
 11 arrested. He has basically not broken out, but he had
 12 not been arrested at the time but he was part of this
 13 team of armed robbers and the intelligence was
 14 suggesting we were told that we were not to approach him
 15 because he was driving round in a high pro motorcycle
 16 with a hand grenade, or the intelligence was that he had
 17 a hand grenade which he would use against police. So
 18 that is sort of like, you know, my opinion and knowledge
 19 of what type of people, you know, these, they are."
 20 Yes?
 21 **A. Yes.**
 22 Q. We have seen that Paul Corkovic was in fact not
 23 a subject of the briefing on 26 January, he was
 24 an associate of the second group, yes?
 25 **A. Yes, sir.**

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1 Q. You wouldn't treat this pre-knowledge, previous
 2 knowledge, of Paul Corkovic as a relevant factor or
 3 matter when you were deploying on 3 March, would you?
 4 **A. No.**
 5 Q. That would be because this was intelligence a decade
 6 earlier, someone who was an associate of a group and not
 7 a subject themselves, who were at that time in some way
 8 linked to another group. Then a month later from the
 9 briefing you were briefed about three subjects and not
 10 the first group, not the associate because the operation
 11 had been split. You just wouldn't take it into account?
 12 **A. I was not aware the operation had been split, but**
 13 **because further subjects didn't feature on the briefing**
 14 **of the 3rd, then, yes, I would have taken it into**
 15 **account.**
 16 Q. The last sentence there, "... my opinion of what type of
 17 people they are", what were you meaning by that? That
 18 they are all the same type of person?
 19 **A. No, just the type of criminality they are involved in.**
 20 Q. Were you trying to lump Mr Grainger as a type of person
 21 there?
 22 **A. No. Just he was involved, or he was featured on the**
 23 **briefings for armed robberies which also featured the**
 24 **Corkovics at some point. So in my opinion they were all**
 25 **the same ilk, where they were basically committing armed**

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<p>1 robberies.</p> <p>2 Q. Would you take that into account, forwards,</p> <p>3 in March 2012? That he had previously featured on</p> <p>4 a briefing at which Paul Corkovic was named as</p> <p>5 an associate and you knew something from a decade</p> <p>6 earlier about Paul Corkovic?</p> <p>7 A. Would I take that to --</p> <p>8 Q. Yes, take it into account when you are deploying on</p> <p>9 3 March?</p> <p>10 A. No.</p> <p>11 Q. Moving away from Operation Shire, more generally when</p> <p>12 you were briefed was it usual for some form of grading</p> <p>13 to be given to the intelligence that you were provided</p> <p>14 with?</p> <p>15 A. No, sir.</p> <p>16 Q. Had you ever encountered that previously?</p> <p>17 A. No, sir.</p> <p>18 Q. By "grading", I am referring, for the avoidance of</p> <p>19 doubt, to the 5x5 system in the National Intelligence</p> <p>20 Model.</p> <p>21 A. Yes.</p> <p>22 Q. Was it usual for some form of words to be used to</p> <p>23 indicate the assessment that had been given of the</p> <p>24 reliability of the intelligence, short of the 5x5</p> <p>25 system?</p> <p style="text-align: center;">Page 209</p>	<p>1 specificity, yes?</p> <p>2 A. Yes. Certainly in its reliability, yes.</p> <p>3 Q. Yes.</p> <p>4 Were you never given words that gave an assessment</p> <p>5 of the reliability of the intelligence, that</p> <p>6 differentiated --</p> <p>7 A. No, sir.</p> <p>8 Q. "There is good intelligence to suggest ...</p> <p>9 "There is reliable intelligence to suggest ...</p> <p>10 "There is some intelligence to suggest ...</p> <p>11 "There is weak intelligence ...</p> <p>12 "There is uncorroborated ...</p> <p>13 "There is unsourced material that ..."</p> <p>14 A. I wouldn't expect anything which was weak,</p> <p>15 uncorroborated or unsourced to feature on a firearms</p> <p>16 briefing.</p> <p>17 Q. And that was the basis on which you were operating?</p> <p>18 A. Yes, sir.</p> <p>19 MR BEER: Sir, I don't know whether that is a convenient</p> <p>20 moment.</p> <p>21 THE CHAIRMAN: Yes.</p> <p>22 Q9, can we resume at 10.00 tomorrow?</p> <p>23 Can that be managed?</p> <p>24 MR WEATHERBY: The same position as I outlined last night</p> <p>25 pertains to Ms Hadfield-Grainger.</p> <p style="text-align: center;">Page 211</p>
<p>1 A. No. My understanding, if it featured on a firearms</p> <p>2 briefing then we would treat it as reliable.</p> <p>3 Q. From where did you gain that understanding?</p> <p>4 A. Because that is what information we would base our</p> <p>5 decisions on.</p> <p>6 Q. That is sort of circular, but who told you you were to</p> <p>7 treat it as reliable?</p> <p>8 A. No one has told me to treat it as reliable but the fact</p> <p>9 that it has featured on a firearms briefing, and</p> <p>10 obviously that information is what we base our decisions</p> <p>11 on. Then I would expect that, or -- not -- yes, expect</p> <p>12 that to be reliable.</p> <p>13 Q. Had you ever been given any training or instructions to</p> <p>14 that effect, or is what you are saying really your</p> <p>15 common sense assumption?</p> <p>16 A. Not that I can recall, no.</p> <p>17 Q. So it is your common sense assumption?</p> <p>18 A. Yes.</p> <p>19 Q. Because somebody is briefing up firearms officers, who</p> <p>20 are going out on to the streets of England with quite</p> <p>21 a lot of weapons, that the intelligence that they are</p> <p>22 being given and upon which they are expected to act has</p> <p>23 been through some form of system?</p> <p>24 A. A checking system, yes.</p> <p>25 Q. But intelligence varies both in its reliability and its</p> <p style="text-align: center;">Page 210</p>	<p>1 THE CHAIRMAN: We will try to start at 10.00.</p> <p>2 MR WEATHERBY: She will do her utmost.</p> <p>3 THE CHAIRMAN: We will try to start at 10.00, I think that</p> <p>4 is the way we will deal with it.</p> <p>5 Q9, please do not speak about your evidence to</p> <p>6 anybody else overnight. Can you be back here for 10.00</p> <p>7 in the morning, please, to carry on.</p> <p>8 If you would like to go with Mrs Shaw now.</p> <p>9 (4.42 pm)</p> <p>10 (The Inquiry adjourned until 10.00 am the following day)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 212</p>

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