

<p>1 Thursday, 6 April 2017 2 (10.05 am) 3 THE CHAIRMAN: Mrs Shaw has gone to fetch the witness, 4 Mr Beer. 5 MR BEER: Thank you, sir. 6 THE CHAIRMAN: I am very sorry, there is a problem with the 7 equipment connected with the video-link. It cannot be 8 sorted out -- it will not take long -- while we are all 9 in here. 10 I am sorry, Q9, I am going to have to ask you to 11 return to the room where you were before just for 12 a couple of minutes. I don't think it will take more 13 than two or three minutes to sort out. The consequence 14 is that if we don't sort it out Mr Stuart Grainger 15 cannot hear anything. 16 (10.10 am) 17 (A short adjournment) 18 (10.12 am) 19 THE CHAIRMAN: Thank you. 20 Q9 (continued) 21 THE CHAIRMAN: Thank you, Q9, you are still under oath. 22 <b>A. Yes, sir.</b> 23 <b>Questions from MR BEER (continued)</b> 24 MR BEER: Q9, we were about to turn to the events of 25 3 March. Can I begin with the circumstances in which</p> <p style="text-align: center;">Page 1</p>	<p>1 Q. -- to make sure that they were true and accurate? 2 <b>A. Yes, sir.</b> 3 Q. Thank you. 4 Did you understand that this was in accordance with 5 the manual of guidance your initial account, your third 6 stage account, yes? 7 <b>A. Yes, sir.</b> 8 Q. Then I think if we go back a tab to tab 1, there is 9 a seven-page witness statement dated 9 March 2012. 10 <b>A. Yes, sir.</b> 11 Q. That is six days after Mr Grainger's death, yes? 12 <b>A. Yes.</b> 13 Q. What in broad terms was the reason for the delay in 14 making this written account? 15 <b>A. The second account? The delay as in?</b> 16 Q. Why did it take six days? 17 <b>A. All I remember is we had some time off after 3 March,</b> 18 <b>the Sunday and Monday, had a legal meeting on the</b> 19 <b>Tuesday with Mike Mackie. He explained to me the</b> 20 <b>circumstances in which my account would be given and it</b> 21 <b>would be possibly weeks maybe months down the line and</b> 22 <b>he stated it would be in the form of a written</b> 23 <b>statement -- sorry, a prepared statement during</b> 24 <b>an interview with the IPCC.</b> 25 <b>From that, I wasn't particularly happy because it</b></p> <p style="text-align: center;">Page 3</p>
<p>1 your accounts of that day were created. Turn up tab 2 2 in the bundle, please. 3 I think these two pages of handwriting are your 4 first account of the incident; is that right? 5 <b>A. Yes, sir.</b> 6 Q. We have some other evidence in the Inquiry that these 7 were written at some time between about 2.30 am and 8 4.45 am on the morning of the 4th; would that sound 9 about right? 10 <b>A. As I recall, yes, sir.</b> 11 Q. Whose writing is it on the two pages? 12 <b>A. It is the legal representative who dealt with me.</b> 13 Q. Okay, and who was that? 14 <b>A. Mike Mackie.</b> 15 Q. Right. How were they written, these two pages, were 16 they written line by line, ie you said something and he 17 wrote it down, you said something and he wrote it down 18 or did you give an account and he then wrote it all 19 down? 20 <b>A. I gave an account and he was writing it down as I was</b> 21 <b>giving the account and then obviously pausing after to</b> 22 <b>let him catch up.</b> 23 Q. Did you check each page and countersign them at the 24 end -- 25 <b>A. I did, yes, sir.</b></p> <p style="text-align: center;">Page 2</p>	<p>1 <b>was going to be quite a way down the line before I gave</b> 2 <b>my account to, you know, the investigating authority.</b> 3 Q. Yes. 4 <b>A. We end up during a meeting on I think the Thursday, the</b> 5 <b>Police Firearms Officers' Association came to</b> 6 <b>Manchester --</b> 7 Q. Yes. 8 <b>A. -- on a welfare visit.</b> 9 Q. That is Thursday the 8th? 10 <b>A. Yes.</b> 11 Q. Who was part of the PFOA that came on the 8th? 12 <b>A. I remember Mark Williams and the principal officer from</b> 13 <b>the Duggan shooting.</b> 14 Q. Who is known at V53. You probably didn't call him that, 15 you called him by his name. 16 <b>A. Yes, sir.</b> 17 Q. Don't tell us his name. 18 <b>A. No, sir.</b> 19 Q. Anyone else as part of the PFOA delegation? 20 <b>A. I think Mike Burke might have been -- that rings a bell,</b> 21 <b>he was another member of the PFOA.</b> 22 Q. These were Met officers; is that right? 23 <b>A. Yes, sir.</b> 24 Q. Just tell us what the circumstances of that were, that 25 meeting. Do you know who arranged it?</p> <p style="text-align: center;">Page 4</p>

1 (Pages 1 to 4)

1 **A. I don't, sorry, sir.**  
 2 Q. How was it that you came along and went to it?  
 3 **A. They basically wanted to meet all the team on a welfare**  
 4 **basis. We are members of the PFOA, it is part of their**  
 5 **remit to come and make sure that obviously post**  
 6 **incident, you know, the welfare of the officers --**  
 7 Q. You were a member of the PFOA?  
 8 **A. I wasn't at the time, but, you know, they actually, you**  
 9 **know, basically let me join at that time.**  
 10 Q. You joined up on the day did you?  
 11 **A. Yes, I did, yes.**  
 12 Q. Right. Was the meeting on the 8th effectively in two  
 13 parts, one a general meeting with all of the firearms  
 14 officers and the three people that you have mentioned  
 15 and then you had a separate meeting with V53?  
 16 **A. Yes, I wouldn't exactly call it a meeting, it was just**  
 17 **a discussion around welfare.**  
 18 Q. Right. The first part of the discussion then, the more  
 19 general one in which everyone was involved, yes.  
 20 **A. Yes.**  
 21 Q. What was said?  
 22 **A. It is just basically the PFOA were highlighting what**  
 23 **sort of support network they provided to officers post**  
 24 **incident.**  
 25 Q. Right. And what did that consist of?

Page 5

1 **A. Just access to any sort of diffusion, I think it was**  
 2 **called, and any sort of counselling services, things**  
 3 **like that.**  
 4 Q. Was there a discussion in the course of that about  
 5 whether you had given an account or not?  
 6 **A. That was mentioned, yes.**  
 7 Q. Who mentioned it?  
 8 **A. I think it was just raised by a few of the officers from**  
 9 **the team saying they were concerned because they had not**  
 10 **actually provided any statements yet.**  
 11 Q. Did Mr Williams, Mr Burke or V53 say anything about  
 12 that?  
 13 **A. They were concerned that that had not been done at that**  
 14 **stage.**  
 15 Q. At this stage I think only the principal officers had  
 16 made an initial account; is that right?  
 17 **A. As far as I am aware, yes, sir.**  
 18 Q. Did you give any thought about whether it was  
 19 appropriate to meet these people before you had made  
 20 your full witness statement about 3 March?  
 21 **A. No, sir.**  
 22 Q. Do you know whether anyone else thought it was  
 23 appropriate to be meeting people before you had made  
 24 your first account?  
 25 **A. No, sir.**

Page 6

1 Q. In relation to the private meeting, or the discussion,  
 2 with V53, what was discussed then?  
 3 **A. It was just all about welfare, I think how -- post his**  
 4 **incident how the welfare support network from the PFOA**  
 5 **had helped him and his family and he basically wanted to**  
 6 **tell me that that support network was there for me as**  
 7 **well if I required it.**  
 8 Q. Was there any discussion about conferring or not  
 9 conferring?  
 10 **A. No.**  
 11 Q. Was there any discussion in the course of either  
 12 meetings, as I have called them, about whether it would  
 13 be appropriate for you all to make your statements  
 14 collectively?  
 15 **A. No.**  
 16 Q. We know that you did make your statements collectively  
 17 the next day --  
 18 **A. Yes.**  
 19 Q. -- 9 March.  
 20 **A. Yes.**  
 21 Q. How did that come about?  
 22 **A. I think because of logistics and having access to 16**  
 23 **computers at the same time, so it was deemed we would**  
 24 **use a room at Nexus House and there is probably**  
 25 **a similar size room to this with banks of, I would say,**

Page 7

1 **50 computers which we could all get on at the same time.**  
 2 Q. So it was for practical reasons?  
 3 **A. Yes, sir.**  
 4 Q. Who told you you had to go along on that occasion to  
 5 make your statement?  
 6 **A. I think it had come from either the firearms commander**  
 7 **or the PSB, after consultation with the IPCC.**  
 8 Q. So either from firearms command -- would that mean your  
 9 inspector or somebody like that?  
 10 **A. Probably a higher rank than the inspector --**  
 11 Q. Right.  
 12 **A. -- so head of the unit.**  
 13 Q. The head of the unit. Would that be the superintendent?  
 14 **A. Either the superintendent or the chief inspector who is**  
 15 **head of firearms.**  
 16 Q. Right. And PSB, that is the Professional Standards  
 17 Branch?  
 18 **A. Yes, sir.**  
 19 Q. You cannot recall who out of each of those told you to  
 20 go along and make the statement?  
 21 **A. I can't, sorry, sir.**  
 22 Q. Okay.  
 23 Then you said after consultation with the IPCC --  
 24 **A. We presumed that the PSB had consulted the IPCC to make**  
 25 **sure that that arrangement was, you know, okay with that**

Page 8

<p>1 <b>body.</b></p> <p>2 Q. You said that you presumed. Was that on the basis of</p> <p>3 any information that you presumed?</p> <p>4 <b>A. No, it was just that they were going to check with the</b></p> <p>5 <b>IPCC and then they came back and said, "Yes, go ahead</b></p> <p>6 <b>and do the statements".</b></p> <p>7 Q. Okay, there is one thing about saying:</p> <p>8 "We are going to do it in statement form, we are</p> <p>9 going to give our accounts in statement form. Is that</p> <p>10 okay, IPCC?"</p> <p>11 Another thing might be:</p> <p>12 "We are all going to get in a room together and do</p> <p>13 it at the same time. Is that okay, IPCC?"</p> <p>14 Which of those two things did you assume had been</p> <p>15 checked with the IPCC?</p> <p>16 <b>A. That didn't even enter my mind, sir.</b></p> <p>17 Q. Okay. What were you assuming had been checked with the</p> <p>18 IPCC then?</p> <p>19 <b>A. That they were happy for us to provide statements of our</b></p> <p>20 <b>accounts of the incidents.</b></p> <p>21 Q. Rather than being interviewed on video or with an audio</p> <p>22 recording?</p> <p>23 <b>A. Yes, sir.</b></p> <p>24 Q. So it came that after lunch or at about lunchtime on</p> <p>25 Friday the 9th you were in a room at Nexus House with</p> <p style="text-align: center;">Page 9</p>	<p>1 <b>A. Yes, sir.</b></p> <p>2 Q. Okay.</p> <p>3 Had you ever participated in that kind of exercise</p> <p>4 before, a mass statement-taking process with a sergeant</p> <p>5 at the front with a flip chart?</p> <p>6 <b>A. Not on that scale, no, sir.</b></p> <p>7 Q. Or on any scale?</p> <p>8 <b>A. Well, most police stations, when you write up</b></p> <p>9 <b>statements, you go to writing rooms, so if there were</b></p> <p>10 <b>several officers involved in the same incident then they</b></p> <p>11 <b>would go to the writing room and complete their</b></p> <p>12 <b>statements.</b></p> <p>13 Q. Yes, but not in relation to an incident such as this?</p> <p>14 <b>A. No.</b></p> <p>15 Q. To what extent did you rely on the flip chart?</p> <p>16 <b>A. Only I think scant details off it, I remembered a lot of</b></p> <p>17 <b>detail from the actual briefing and the actual incident.</b></p> <p>18 Q. Can you recall to what extent you relied on the flip</p> <p>19 chart?</p> <p>20 <b>A. I think maybe the address of the lay up point at the</b></p> <p>21 <b>public house.</b></p> <p>22 Q. Let's just have a look, shall we, there should be on the</p> <p>23 bench to your left-hand side, a copy of the three pages</p> <p>24 of the flip chart. If we look at your witness statement</p> <p>25 in tab 1, please.</p> <p style="text-align: center;">Page 11</p>
<p>1 the other officers; is that right?</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. We have heard evidence that there was a flip chart</p> <p>4 produced.</p> <p>5 <b>A. Yes, sir.</b></p> <p>6 Q. Who produced the flip chart?</p> <p>7 <b>A. I think it might have been J4. J4.</b></p> <p>8 Q. Was that in the room completed before you started</p> <p>9 writing your statements?</p> <p>10 <b>A. No, I think it was added to as we completed our</b></p> <p>11 <b>statements. You know, people would ask a question, what</b></p> <p>12 <b>time was the briefing? Or things like that and then</b></p> <p>13 <b>that was put on there.</b></p> <p>14 Q. Where was J4 getting the information from?</p> <p>15 <b>A. I am not too sure, sir.</b></p> <p>16 Q. Was it information being provided by the room that was</p> <p>17 in turn then written up or was it information that he</p> <p>18 was getting from somewhere else?</p> <p>19 <b>A. I couldn't tell you, sir.</b></p> <p>20 Q. Did you hear people effectively calling stuff out and on</p> <p>21 the basis of what they called out he wrote it up?</p> <p>22 <b>A. No, sir.</b></p> <p>23 Q. It was the other way round, he was getting it from</p> <p>24 somewhere else, writing it up and then people were using</p> <p>25 it?</p> <p style="text-align: center;">Page 10</p>	<p>1 I don't think there is anything on page 1, yes, of</p> <p>2 your witness statement?</p> <p>3 <b>A. No.</b></p> <p>4 Q. Page 2, we have the fact that you came on duty at 4.30.</p> <p>5 On the flip chart it says, "Tour of duty: 4.30". Do you</p> <p>6 think you would have got that from there or remembered</p> <p>7 that?</p> <p>8 <b>A. I would have remembered that, tour of duty.</b></p> <p>9 Q. We can see on the flip chart it says I think that the</p> <p>10 briefing ended at approximately 06.15. In your witness</p> <p>11 statement you have:</p> <p>12 "The briefing concluded at 6.15 am."</p> <p>13 Do you think you got that from the flip chart?</p> <p>14 <b>A. No, that is probably just from memory --</b></p> <p>15 Q. That is memory as well, is it?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Then over the page in your witness statement, page 3,</p> <p>18 can you see three paragraphs from the bottom, it says in</p> <p>19 the middle of the paragraph:</p> <p>20 "At 6.15 pm we were given information that the</p> <p>21 subjects were within the red Audi. State Green was</p> <p>22 declared and we moved off towards Culcheth."</p> <p>23 Yes?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. On the flip chart it says:</p> <p style="text-align: center;">Page 12</p>

3 (Pages 9 to 12)

1 "18.15: leave Leigh police station. Green."  
 2 Do you think you got that from the flip chart?  
 3 **A. Possibly. But I am sure in my initial account I had put**  
 4 **it was 10 or 15 minutes after we held outside Leigh**  
 5 **police station.**  
 6 Q. I was going to ask you that because in your initial  
 7 account, if we go forward to tab 2, we can see on the  
 8 first page, three paragraphs in, you say:  
 9 "At approximately 6.00 pm, probably just before  
 10 6.00 pm, we deployed to a road outside the police  
 11 station."  
 12 Yes?  
 13 **A. Yes.**  
 14 Q. Then four lines in you say:  
 15 "After 10 or 15 minutes we made our way."  
 16 Yes.  
 17 **A. Yes.**  
 18 Q. That was your recollection on the night?  
 19 **A. Yes.**  
 20 Q. A matter of hours after the incident?  
 21 **A. Yes.**  
 22 Q. Yes?  
 23 Whereas in your witness statement you have said that  
 24 it was at 6.15 pm.  
 25 **A. Perhaps the flip chart has just affirmed that time.**

Page 13

1 Q. You think you might have used the flip chart for that?  
 2 **A. Possibly, possibly.**  
 3 Q. Yes. Just explain the thought process for that, if you  
 4 had a thought process about it. You had written  
 5 an account up, where you had not unnaturally said that  
 6 something had happened at about 6.00 or probably just  
 7 before it and then about 10 or 15 minutes later, I can't  
 8 really recall, something else happen happened. Yes?  
 9 **A. Yes.**  
 10 Q. Which is I think how most of us would approach life.  
 11 **A. Yes, sir.**  
 12 Q. Then you make a witness statement and say, "At 6.15 pm  
 13 I did this", on the basis of a flip chart that somebody  
 14 else had written. What was your thought process of  
 15 undertaking that kind of exercise?  
 16 **A. It didn't enter my mind that this was influencing, you**  
 17 **know, my timings. It was just obviously if I have seen**  
 18 **it then it has probably just reaffirmed subconsciously.**  
 19 Q. Did you think it was the right thing to do, to take  
 20 times from somebody else that something happened when  
 21 you yourself couldn't verify those times?  
 22 **A. At the time it didn't -- I didn't think about it like**  
 23 **that, but with hindsight it doesn't seem right.**  
 24 Q. Okay.  
 25 Just a couple of other details then on the flip

Page 14

1 chart.  
 2 I think the registration number, also in that third  
 3 paragraph from bottom, from page 3 of the witness  
 4 statement, of "LO08 LOD".  
 5 **A. Yes.**  
 6 Q. Do you think you took that from the flip chart?  
 7 **A. Highly likely, yes, sir.**  
 8 Q. Then lastly at the foot of the page you say:  
 9 "Due to the movement of the subject vehicle around  
 10 the Culcheth area we drove to the Raven public house on  
 11 Warrington Road at its junction with Hey Shot Lane."  
 12 Yes?  
 13 **A. Yes.**  
 14 Q. If you look at the flip chart on the right-hand side for  
 15 page 1, it says:  
 16 "Raven Inn, Warrington Road, junction with Hey Shot  
 17 Lane."  
 18 Yes?  
 19 **A. Yes.**  
 20 Q. In fact the road I think is "Hey Shoot Lane", so that  
 21 would tend to suggest that you have literally copied  
 22 what was written up, including the misspelling of  
 23 "shoot" for "shot"?  
 24 **A. Yes, sir.**  
 25 Q. Yes?

Page 15

1 You don't, as far as I can see, include the State  
 2 Amber or State Red times in your account.  
 3 **A. No, sorry.**  
 4 Q. Given that you appear to have used other times, the  
 5 State Green, the registration number and the location of  
 6 the pub, why not the State Amber and State Red times?  
 7 **A. I was probably just concentrating on the actual content**  
 8 **not the times when I was writing the statement.**  
 9 Q. It wasn't because you thought, "Hold on, I can't verify  
 10 those times"?  
 11 **A. No, sir.**  
 12 Q. Okay.  
 13 At the time, did this exercise feel inappropriate in  
 14 any way?  
 15 **A. No, sir.**  
 16 Q. If you look at the last paragraph of your witness  
 17 statement, you say:  
 18 "I made this statement on 9 March starting at 1.15  
 19 in the presence of my colleagues. During the making of  
 20 the statement I from time to time clarified with my  
 21 colleague matters relating to times, vehicles, locations  
 22 and suspect details."  
 23 Yes?  
 24 **A. Yes.**  
 25 Q. The process of looking at the flip chart was not

Page 16

<p>1 consulting with your colleagues?</p> <p>2 <b>A. No.</b></p> <p>3 Q. Which colleagues did you consult in relation to the four</p> <p>4 matters that are set out there, times, vehicles,</p> <p>5 locations and suspects?</p> <p>6 <b>A. I didn't consult with any of them; it is what was from</b></p> <p>7 <b>the flip chart.</b></p> <p>8 Q. Right. So you didn't consult with anyone else but you</p> <p>9 wrote down that you did?</p> <p>10 <b>A. Yes, that was a form of words which was put on the flip</b></p> <p>11 <b>chart which the legal representative said, "Put that at</b></p> <p>12 <b>the end of the statement".</b></p> <p>13 Q. On that, why did you write something that wasn't true?</p> <p>14 <b>A. It was basically to highlight that we had used the flip</b></p> <p>15 <b>chart to --</b></p> <p>16 Q. But it doesn't say that though, does it?</p> <p>17 <b>A. No, it doesn't, sir.</b></p> <p>18 Q. Did you give any consideration to that point, that the</p> <p>19 thing that you were saying that you did, you hadn't</p> <p>20 done, yes?</p> <p>21 You were saying here, "I have consulted with my</p> <p>22 colleagues" and on your account you hadn't done that.</p> <p>23 Yet the thing you had done, namely consulting a flip</p> <p>24 chart, is not disclosed.</p> <p>25 <b>A. It didn't even cross my mind, sir.</b></p> <p style="text-align: center;">Page 17</p>	<p>1 presentation and the oral briefings to AFOs that went</p> <p>2 with it were constructed on the basis of an intelligence</p> <p>3 package prepared by the sponsor department, here the</p> <p>4 Robbery Unit?</p> <p>5 <b>A. Yes, sir.</b></p> <p>6 Q. If we look in your interview bundle, please, that is</p> <p>7 bundle B, at page 31, please. B/31.</p> <p>8 <b>A. Yes, sir.</b></p> <p>9 Q. Towards the foot of the page the interviewer asks you:</p> <p>10 "Just clarify, when you say the firearms department,</p> <p>11 are you saying that they research that themselves or are</p> <p>12 they presented with an intelligence package?"</p> <p>13 You say:</p> <p>14 "No, they are presented with an intelligence package</p> <p>15 which will come from the Robbery Unit or whichever our</p> <p>16 sponsors are, we are sort of like the tool in the box.</p> <p>17 So that information comes in is from the investigating</p> <p>18 agency."</p> <p>19 Yes?</p> <p>20 <b>A. Yes, sir.</b></p> <p>21 Q. It was your understanding that the firearms department</p> <p>22 didn't carry out the research itself to create the</p> <p>23 PowerPoints and the oral briefing that goes with it,</p> <p>24 they get a package from the sponsor, here the Robbery</p> <p>25 Unit?</p> <p style="text-align: center;">Page 19</p>
<p>1 Q. You recognise, I think, the irony of this, that you are</p> <p>2 almost admitting to doing something here conferring,</p> <p>3 when on your account you didn't?</p> <p>4 <b>A. No.</b></p> <p>5 Q. But you wrote that because that was the form of words</p> <p>6 provided to you?</p> <p>7 <b>A. Yes, sir.</b></p> <p>8 Q. You said that it was given by a legal representative.</p> <p>9 <b>A. Yes, sir.</b></p> <p>10 Q. Which lawyer was present at the meeting?</p> <p>11 <b>A. Nick Holroyd.</b></p> <p>12 Q. Nick Holroyd from Russell, Jones &amp; Walker?</p> <p>13 <b>A. Yes, as it was at the time, yes.</b></p> <p>14 Q. Yes, now Slater &amp; Gordon?</p> <p>15 <b>A. Yes, sir.</b></p> <p>16 Q. Was he present throughout the meeting?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Can I turn then to the events of 3 March. You attended</p> <p>19 an early morning briefing at the TFU at Openshaw?</p> <p>20 <b>A. Yes, sir.</b></p> <p>21 Q. I want to start with your understanding of how it was</p> <p>22 that the briefing came to be created.</p> <p>23 <b>A. Okay.</b></p> <p>24 Q. Yes?</p> <p>25 Was it your understanding that the PowerPoint</p> <p style="text-align: center;">Page 18</p>	<p>1 <b>A. Yes, with the details of, you know, intelligence and</b></p> <p>2 <b>subjects.</b></p> <p>3 Q. Yes. Would this be right, that is presumably because</p> <p>4 here the Robbery Unit have been looking at the subjects</p> <p>5 for many months?</p> <p>6 <b>A. Yes, sir.</b></p> <p>7 Q. In Mr Totton's case, for some five months. And</p> <p>8 therefore they have had the time to hone the</p> <p>9 intelligence case very carefully?</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. They can hone it down so that it is as accurate and</p> <p>12 reliable as possible?</p> <p>13 <b>A. Yes, sir.</b></p> <p>14 Q. They have had the opportunity to develop the</p> <p>15 intelligence case, yes?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. And, where possible, corroborate the intelligence that</p> <p>18 they are giving to you?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Or not corroborate it, depending on what the outcome of</p> <p>21 the enquiry is, but they have had that opportunity?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Yes. Whereas if the firearms department had to create</p> <p>24 the PowerPoint presentation, at say 4.00 in the morning,</p> <p>25 ready for a 6.00 briefing, they wouldn't have much time</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

1 to do it --

2 **A. No, sir.**

3 Q. -- and the resources would be the normal police systems?

4 **A. Yes.**

5 Q. They would be starting from scratch --

6 **A. Yes.**

7 Q. -- and it might all be a little bit rushed?

8 **A. Yes.**

9 Q. The briefing that you received, to what extent in

10 general terms did it differ from other briefings of

11 a similar nature, ie ready for a deployment, that you

12 had received?

13 **A. That was a general format of most briefings for**

14 **a firearms team.**

15 Q. In terms of mode of delivery, content and structure, it

16 was par for the course?

17 **A. Yes, sir.**

18 Q. From your perspective, therefore, like any other

19 briefing?

20 **A. Yes, sir.**

21 Q. Can we turn to the intelligence case that was presented.

22 I think if we just put bundle B to one side for the

23 moment and take out the general firearms officer bundle,

24 number 2, please.

25 Thank you Q9, and turn up tab 22, please.

Page 21

1 This is a copy of the PowerPoint that was displayed?

2 **A. Yes, sir.**

3 Q. We can see your name on the second page, 1266?

4 **A. Yes.**

5 Q. Then the intelligence case on page 1267?

6 **A. Yes.**

7 Q. I just want to take a little bit of time going through

8 this. In the first paragraph, did you understand the

9 reference to "the subjects" to be the three subjects

10 that were then named?

11 **A. Yes.**

12 Q. The sentence reads:

13 "The subjects of this operation are believed to be

14 engaged in armed robberies in the north-west region."

15 Yes?

16 **A. Yes, sir.**

17 Q. Would you agree that the reference to an armed robbery

18 was a reference to any type of weapon and not

19 necessarily a firearm?

20 **A. Taken in context then, I believed it was firearms.**

21 Q. I am sorry, you said "taken in context"?

22 **A. With the rest of the intelligence and the capability of**

23 **the subjects.**

24 Q. Why was that?

25 **A. Because of the intelligence picture painted that they**

Page 22

1 **used firearms during the bank robbery in 2008 in**

2 **Preston. And then if you look at the capabilities of**

3 **Totton and Anthony Grainger, there is mention of**

4 **firearms there.**

5 Q. When that first sentence was read out you wouldn't have

6 understood it that way, but when you were told other

7 things later in the briefing, and shown other things

8 later in the PowerPoint, you thought that "armed

9 robbery" meant firearms and only firearms?

10 **A. Well I had had previous knowledge of this from**

11 **a previous briefing, so I remembered obviously what the**

12 **subjects' capabilities were from the previous briefing**

13 **and this was an ongoing operation.**

14 Q. You had remembered back to 26 January?

15 **A. Yes, sir.**

16 Q. How many operations had you been on in between?

17 **A. None.**

18 Q. This stood out in your mind then?

19 **A. Yes, sir.**

20 Q. Now I think uniquely amongst the firearms officers we

21 have heard from so far, you are the only one that

22 interpreted "armed" to mean firearms and only firearms.

23 Do you understand?

24 **A. I understand that, yes, sir.**

25 Q. And you are obviously the only officer that discharged

Page 23

1 their weapon that resulted in somebody's death on this

2 occasion.

3 **A. Yes, sir.**

4 Q. Do you think you are reflecting back now seeking to

5 justify what you did by saying that you interpreted

6 "armed" as meaning "firearms"?

7 **A. No, sir.**

8 Q. Can you help us why it is that you uniquely interpreted

9 armed as meaning firearms?

10 **A. Because of the intelligence picture painted after, that**

11 **sentence "engaged in armed robbery".**

12 Q. But the intelligence picture was heard by every other

13 officer as well and all of those we have heard from

14 said:

15 "No, it means firearms, an axe, a machete, a knife,

16 a baseball bat, any weapon, 'armed' does not mean and

17 only mean 'firearms'."

18 **A. It is whether they have taken that in context of the**

19 **whole briefing or just about that sentence "engaged in**

20 **armed robberies."**

21 Q. Well I have asked them all about the whole briefing and

22 the answer has been the same.

23 **A. Okay.**

24 Q. You say that, taken as a whole, you thought that you

25 were being told that these men were believed to be

Page 24

<p>1 engaged in armed robberies which they would have 2 firearms. Is that right? 3 <b>A. Yes. Yes, sir.</b> 4 Q. Do you agree that you were not given any current 5 intelligence that the subjects had access to firearms? 6 <b>A. Yes, sir.</b> 7 Q. Do you agree that you were not given any current 8 intelligence that the subjects would be or may be armed 9 with firearms on this occasion? 10 <b>A. Yes, sir. Just on that point, sir, I wasn't given 11 anything to the contrary either.</b> 12 Q. Does that mean you assume the worst? 13 <b>A. No, sir.</b> 14 Q. If we look at tab 2 of your bundle, please, and the end 15 of the first paragraph, where you are speaking of the 16 briefing. You say: 17 "We knew that the occupants were likely to be armed 18 and dangerous." 19 Yes? 20 <b>A. Yes, sir.</b> 21 Q. There, again, did you mean armed with firearms? 22 <b>A. Yes, sir.</b> 23 Q. Why didn't you say "armed with firearms"? 24 <b>A. In --</b> 25 Q. In that sentence there?</p> <p style="text-align: center;">Page 25</p>	<p>1 <b>A. Yes, sir.</b> 2 Q. If you look at your witness statement, please, at tab 1, 3 page 267. 4 <b>A. Yes.</b> 5 Q. Yes? The purpose of this witness statement I think was 6 to set out what you recalled of the events of 3 March; 7 is that right? 8 <b>A. Yes, sir.</b> 9 Q. In particular the purpose of this witness statement, the 10 stage 4 witness statement, was to describe what you had 11 seen and what you had heard which led to your use of 12 force. Would you agree? 13 <b>A. Yes, sir.</b> 14 Q. If we look, please, at page 267, you are speaking in the 15 fourth paragraph there, the one which begins, "The 16 operational briefing ..." 17 <b>A. Yes, sir.</b> 18 Q. About what you recalled of the briefing, yes? 19 <b>A. Yes, sir.</b> 20 Q. This was important because I think you were to say that 21 what you were told in the briefing in part justified 22 your decision to shoot; is that right? 23 <b>A. Yes, sir.</b> 24 Q. That paragraph there, paragraph 4, "The operational 25 briefing commenced just before 6.00 am ..."</p> <p style="text-align: center;">Page 27</p>
<p>1 <b>A. -- that account? Because I thought they were likely to 2 be armed.</b> 3 Q. You are speaking of the briefing here at 6.00 in the 4 morning on the 3rd -- 5 <b>A. Yes.</b> 6 Q. -- and you used the phrase, "We knew the occupants were 7 likely to be armed". 8 By that phrase did you mean armed with firearms? 9 <b>A. Yes, sir.</b> 10 Q. Okay. 11 Can we turn to the second paragraph in the briefing, 12 so that is back to tab 22 of the general bundle 2, 13 page 1267. Do you have that: 14 "There is intelligence to suggest ..." 15 <b>A. Yes, sir.</b> 16 Q. Yes? 17 It reads: 18 "There is intelligence to suggest that these 19 subjects were responsible for a robbery in 2008 in 20 Preston, where they broke into a bank and lay in wait 21 for the staff to arrive. On their arrival they were 22 held at gunpoint, shotgun and handgun. Tied up and 23 forced to hand over keys to the strong room. The 24 subjects made good their escape with a substantial 25 amount of money."</p> <p style="text-align: center;">Page 26</p>	<p>1 Was that compiled from memory? 2 <b>A. As I remember, yes, sir.</b> 3 Q. And that would be the fair and proper thing to do? 4 <b>A. Yes, sir.</b> 5 Q. We can see that you don't say there that, "I have taken 6 this from some other person or some other document that 7 I copied out ..." 8 <b>A. No, sir.</b> 9 Q. There is no equivalent of the conferral form of words at 10 the end of the statement in relation to this? 11 <b>A. No, sir.</b> 12 Q. If we just compare what is written in that paragraph 13 with the page that we have open, in the second sentence 14 it says, of your witness statement: 15 "The intelligence suggested that the subjects were 16 responsible for a robbery in Preston in 2008." 17 <b>A. Yes.</b> 18 Q. The briefing says: 19 "There is intelligence to suggest that these 20 subjects were responsible for a robbery in 2008 in 21 Preston." 22 Yes? 23 <b>A. Yes.</b> 24 Q. Then your paragraph continues: 25 "... where they broke into a bank and lay in wait</p> <p style="text-align: center;">Page 28</p>

1 for the staff."  
 2 The briefing says:  
 3 "... where they broke into a bank and lay in wait  
 4 for the staff to arrive".  
 5 Your witness statement says:  
 6 "... when the staff arrived they held them at  
 7 gunpoint, a shotgun and a handgun."  
 8 The briefing says:  
 9 "... on arrival they were held at gunpoint, shotgun  
 10 and a handgun."  
 11 Your statement continues:  
 12 "... tied up the staff and forced them to hand over  
 13 the keys to the strong room."  
 14 The briefing says:  
 15 "... tied up and forced to hand over the keys to the  
 16 strong room."  
 17 Your statement continues:  
 18 "... and then stole a substantial amount of cash."  
 19 The briefing says:  
 20 "... the subjects made good their escape with  
 21 a substantial amount of money."  
 22 Yes?  
 23 **A. Yes, sir.**  
 24 Q. You can see that they are very, very closely correlated?  
 25 **A. Yes.**

Page 29

1 Q. Do you think you had this briefing in front of you when  
 2 you were making the statement?  
 3 **A. No, sir.**  
 4 Q. You have set out the order of events in precisely the  
 5 same way, yes?  
 6 **A. Yes.**  
 7 Q. You have used a lot of the similar language and on  
 8 occasions it is verbatim?  
 9 **A. Yes, sir.**  
 10 Q. Have you a photographic memory?  
 11 **A. No. No, sir.**  
 12 Q. How were you able to remember six days later, having  
 13 gone through what was undoubtedly a traumatic event,  
 14 passages of a briefing verbatim?  
 15 **A. That is just how I remembered it.**  
 16 Q. You remembered it verbatim?  
 17 **A. It is just how I recall it, sir.**  
 18 Q. Are you sure that when you were making this witness  
 19 statement, in order to set out accurately what you had  
 20 been told, you didn't get a copy of the PowerPoint?  
 21 **A. No, sir.**  
 22 Q. You see other officers have done the same. Other  
 23 officers have been able to recall very well what they  
 24 were told about the Preston robbery in 2008. And others  
 25 on occasion have been able to remember it verbatim.

Page 30

1 Wasn't the copy of the PowerPoint being passed around?  
 2 **A. Not that I recall, sir, no.**  
 3 Q. In any event then, did you treat the reference to these  
 4 subjects in that paragraph as meaning the three men that  
 5 you were then briefed about?  
 6 **A. Yes, sir.**  
 7 Q. Did you treat the information that you were being given  
 8 as conviction information?  
 9 **A. As in that paragraph about the bank robbery?**  
 10 Q. Yes.  
 11 **A. No, it was intelligence.**  
 12 Q. Is that because it begins with the phrase, "There is  
 13 intelligence to suggest that ..."?  
 14 **A. Yes, sir.**  
 15 Q. How do you treat a paragraph such as that, "There is  
 16 intelligence to suggest that ..."?  
 17 **A. If it is appearing on a firearms briefing, then I would  
 18 expect it to be reliable.**  
 19 Q. Why would you expect it to be reliable?  
 20 **A. Because it is appearing on the firearms briefing.**  
 21 Q. I think you know now that a lot of this is wildly  
 22 inaccurate?  
 23 **A. Unfortunately, yes, sir.**  
 24 Q. Can we move on to the third and the fourth paragraphs,  
 25 please.

Page 31

1 This was more about the current position, is that  
 2 right? Third and fourth paragraphs of page 1267?  
 3 **A. Yes, sir.**  
 4 Q. That is more about the current position?  
 5 **A. Yes, sir.**  
 6 Q. The last paragraph:  
 7 "The subjects have been observed conducting recces  
 8 in Culcheth town centre, although it is unclear at this  
 9 time what the specific target may be."  
 10 Yes?  
 11 **A. Yes, sir.**  
 12 Q. If we look, please, at tab 1 of your bundle, and  
 13 therefore your witness statement, at page 267.  
 14 **A. Yes.**  
 15 Q. Three paragraphs from the bottom, starting, "The  
 16 briefing ..."  
 17 **A. Yes.**  
 18 Q. You say:  
 19 "The briefing also identified the area which the  
 20 offenders were believed to be targeting."  
 21 That is Culcheth, is that right?  
 22 **A. Yes, sir.**  
 23 Q. If we go on to tab 2 of that bundle and look at the  
 24 second paragraph, you say:  
 25 "It was anticipated that if the MASTS strike did

Page 32



<p>1 occur, it would happen in the Culcheth area." 2 Is that right? 3 <b>A. Yes, sir.</b> 4 Q. That was the basis on which everyone was working; is 5 that right? 6 <b>A. Yes, sir.</b> 7 Q. Back in your witness statement, you say: 8 "In this area several cash-rich premises had been 9 identified by the firearms planning team." 10 Yes? 11 <b>A. Yes, sir.</b> 12 Q. Were you told that they had been identified as cash-rich 13 premises? 14 <b>A. I can't recall. It is from the PowerPoint overview of</b> 15 <b>the actual premises identified, which I have made that</b> 16 <b>assumption.</b> 17 Q. I don't think anyone said in the briefing these are 18 cash-rich premises. 19 <b>A. Not that I can recall.</b> 20 Q. You were shown some premises and you identified them as 21 cash rich; is that right? 22 <b>A. Yes, sir.</b> 23 Q. How did you know that the premises had been identified 24 by the firearms planning team as opposed to the TFC or 25 the SIO?</p> <p style="text-align: center;">Page 33</p>	<p>1 Q. Just to confirm what you said closer to the time about 2 that, if we look in your interview, please, at B/39, are 3 you there? 4 <b>A. Yes, sir.</b> 5 Q. At the foot of the page at 4.40.23, you are asked: 6 "But there was no specific intelligence on the day 7 to say that they were actually in possession of firearms 8 or weapons at this time?" 9 Then you say: 10 "No, only in intelligence which was delivered during 11 the start of the briefing." 12 <b>A. Yes, sir.</b> 13 Q. Can you help us what that means, you are saying, "No, 14 but yes"? 15 <b>A. There is no specific intelligence on the day to say they</b> 16 <b>are actually in possession of firearms.</b> 17 Q. Yes. 18 <b>A. The TFC didn't say, "Right, these lads have definitely</b> 19 <b>got firearms".</b> 20 Q. Yes, or, "There is intelligence to suggest that they 21 have firearms"? 22 <b>A. Yes.</b> 23 Q. He didn't say that? 24 <b>A. No.</b> 25 <b>It is just from the intelligence on the briefing</b></p> <p style="text-align: center;">Page 35</p>
<p>1 <b>A. I believe they had been on a recce.</b> 2 Q. Did you know that in fact the premises that were set 3 out, I think there were eight of them in the PowerPoint 4 presentation, had been identified in a presentation the 5 day before for the same operation but a different 6 tactical plan and had just been cut and pasted across? 7 <b>A. No.</b> 8 Q. I suppose you wouldn't be aware of that, would you? 9 <b>A. No, I wasn't on duty the date before.</b> 10 Q. Were there other officers that were on duty on the 11 previous night's deployment as part of your team of 16 12 on this day? 13 <b>A. I am not sure.</b> 14 Q. Okay, we know that there were. 15 <b>A. Okay.</b> 16 Q. Did anyone speak about the previous night's operation? 17 <b>A. They most likely did do, but I can't remember what about</b> 18 <b>it.</b> 19 Q. Did anyone say that the plan the previous night had been 20 to stop the subjects from getting to Culcheth? 21 <b>A. No.</b> 22 Q. In the course of the briefing, I think there was no 23 mention of intelligence suggesting that there would be 24 firearms in the vehicle, yes? 25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 34</p>	<p>1 <b>that I was given.</b> 2 Q. You are saying that what you were told about the 2008 3 robbery, yes? 4 <b>A. Yes, sir.</b> 5 Q. And what you were told about some of the subjects -- 6 <b>A. Yes, sir.</b> 7 Q. -- led you to believe that the use of the word "armed" 8 must mean armed with firearms? 9 <b>A. Yes, sir.</b> 10 Q. Can we turn to B/48, please. 11 At the top of the page, one of the interviewers 12 says: 13 "I know we discussed previously ... that the 14 questions on the day which was, you know, was taped. 15 There was no specific mention of firearms in the vehicle 16 at that briefing?" 17 "Answer: No." 18 That's you: 19 "Was there any mention at all in the vehicle at that 20 briefing?" 21 "No." 22 That was the basis on which you were working come 23 the evening? 24 <b>A. Yes.</b> 25 Q. Did you notice that that kind of assessment of whether</p> <p style="text-align: center;">Page 36</p>

1 or not there was current intelligence to suggest that  
 2 the subjects were or might be armed, or current  
 3 intelligence that the subjects had access to firearms,  
 4 was missing from the briefing?  
 5 **A. No, the intelligence that was on the briefing I took as**  
 6 **being reliable.**  
 7 Q. That is a separate question.  
 8 One of the critical things that an AFO would wish to  
 9 know is whether or not it was assessed that the subjects  
 10 were likely to have firearms?  
 11 **A. Yes.**  
 12 Q. That is completely missing from the briefing that you  
 13 were given, isn't it?  
 14 **A. The briefing I was given was the capability of the**  
 15 **subjects.**  
 16 Q. Well, we will come on to the capability in a moment.  
 17 But what is missing from the briefing is whether there  
 18 is any current intelligence that the subjects have or  
 19 might have access to firearms, isn't it?  
 20 **A. Yes.**  
 21 Q. Or indeed a high level statement of whether, given the  
 22 past intelligence about them, it is therefore to be  
 23 assumed that they will have access to firearms. That  
 24 was absent too, wasn't it?  
 25 **A. Yes.**

Page 37

1 Q. All you are given is two dots.  
 2 (1) is they are believed to be engaged in conspiracy  
 3 to commit armed robberies.  
 4 (2) this is their background.  
 5 You are left to fill in the dots?  
 6 **A. Yes.**  
 7 Q. And the other officers have filled in the dots in  
 8 a different way to you?  
 9 **A. I can't speak for the other officers, their threat**  
 10 **assessment.**  
 11 Q. Can we turn then to what was said about the individual  
 12 subjects.  
 13 We are back in the general firearms folder at  
 14 tab 22, over the page to 1268. Namely Mr Totton, yes?  
 15 **A. Yes.**  
 16 Q. His ICI, identity, capability and intent, is set out.  
 17 Yes?  
 18 **A. Yes.**  
 19 Q. Do you treat these warnings as if they are based on  
 20 intelligence only?  
 21 **A. It could be intelligence or convictions or arrests.**  
 22 Q. If Mr Totton had been convicted of any of the things  
 23 mentioned there, you would expect to be told, wouldn't  
 24 you?  
 25 **A. Possibly, yes.**

Page 38

1 Q. There is a significant difference, isn't there, between  
 2 something that is backed up by conviction in a court of  
 3 law and a sentence being imposed by a judge and  
 4 something that is based on intelligence?  
 5 **A. Well, as I said previously, if it is on here I treated**  
 6 **it as reliable, whatever the source of that information**  
 7 **was.**  
 8 Q. You -- again, that is a different point. You don't  
 9 distinguish between something that is based on  
 10 intelligence and is based on a conviction?  
 11 **A. You would distinguish it, if it was on a firearms**  
 12 **briefing. But if it was information given to myself on**  
 13 **a firearms briefing, then I would treat it as reliable,**  
 14 **so there wouldn't be a distinguish -- you know, it**  
 15 **wouldn't make the information more reliable or less**  
 16 **reliable because it was a conviction or whether it was**  
 17 **just intelligence.**  
 18 Q. If you look on that page, you are not told at all that  
 19 Mr Totton had been convicted of any of these offences,  
 20 had you?  
 21 **A. No.**  
 22 Q. If you look on the next page for Mr Rimmer, you see that  
 23 you are told that he had served a five-and-a-half-year  
 24 sentence for an assault, yes?  
 25 **A. Yes.**

Page 39

1 Q. Are you giving the answer that you are now because you  
 2 know that when you were interviewed you said that you  
 3 were told that Mr Totton had been convicted of  
 4 possession of a shotgun in 1999?  
 5 **A. No.**  
 6 Q. If we look at that, please, at B/39?  
 7 MR DAVIES: Can we have the date of interview?  
 8 MR BEER: Yes, 10 April.  
 9 At B/39.  
 10 **A. Yes.**  
 11 Q. Can you see in the middle of the page you say:  
 12 "On the threat assessment, during that, when they  
 13 went through Totton's threat assessment, he was linked  
 14 to possession of a shotgun in 1999 where he was  
 15 convicted of possession of a shotgun in 1999."  
 16 Yes?  
 17 **A. Yes.**  
 18 Q. Do you now know that he was not convicted of possession  
 19 of a shotgun in 1999?  
 20 **A. If that is what you are telling me, sir, yes.**  
 21 Q. Do you now know it? Is that the first time you have  
 22 heard it?  
 23 **A. Yes, I don't know now.**  
 24 Q. Sorry?  
 25 **A. I don't know now that he was convicted, it is just**

Page 40

<p>1 <b>I have gone off the briefing.</b></p> <p>2 Q. Why did you go off the briefing and assume that he had</p> <p>3 been convicted?</p> <p>4 <b>A. I didn't assume he had been convicted.</b></p> <p>5 Q. Why did you say in interview he had been convicted?</p> <p>6 <b>A. I don't know, sir.</b></p> <p>7 Q. Try and help us if you would.</p> <p>8 <b>A. Honestly, I honestly don't know why I said that, sir.</b></p> <p>9 <b>Possibly an assumption.</b></p> <p>10 Q. Why would you assume that somebody was convicted of</p> <p>11 an offence?</p> <p>12 <b>A. Because he is linked to the possession of a shotgun.</b></p> <p>13 Q. That is not really an answer. That could be</p> <p>14 intelligence only --</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. -- it could be as a result of an arrest, it could be as</p> <p>17 a result of a charge --</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. -- and a failed prosecution, it could be as a result of</p> <p>20 a conviction. Why did you assume that it was</p> <p>21 a conviction?</p> <p>22 <b>A. I don't know now, sir.</b></p> <p>23 Q. Do you think on 3 March you believed that this was</p> <p>24 a conviction?</p> <p>25 <b>A. No, I just went off the intelligence that was given to</b></p> <p style="text-align: center;">Page 41</p>	<p>1 Q. Does that add anything to what you were told at the</p> <p>2 beginning of the briefing? You were told at the</p> <p>3 beginning of the briefing that they were believed to be</p> <p>4 engaged in armed robberies in the north-west and you are</p> <p>5 told their intent is conspiracy to commit armed</p> <p>6 robberies. How does that add to the picture by</p> <p>7 suggesting that they were doing the armed robberies with</p> <p>8 firearms?</p> <p>9 <b>A. It just reaffirms what offence they were committing.</b></p> <p>10 Q. But why does it lead to your belief that the weapons</p> <p>11 they would use would be firearms?</p> <p>12 <b>A. Because of what the previous intelligence was regarding</b></p> <p>13 <b>the capability.</b></p> <p>14 Q. It is the capability that is the important part, is it?</p> <p>15 <b>A. And the intelligence picture painted regarding the</b></p> <p>16 <b>robbery in the bank in Preston.</b></p> <p>17 Q. So it is the bank in Preston in 2008, yes --</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. -- and then the capability of, in particular, Mr Totton</p> <p>20 and Mr Grainger. Is that right?</p> <p>21 <b>A. Yes, sir.</b></p> <p>22 Q. Because I don't think Mr Rimmer's warnings mentioned</p> <p>23 firearms.</p> <p>24 <b>A. No, sir.</b></p> <p>25 Q. Mr Grainger's capability was said to include him being</p> <p style="text-align: center;">Page 43</p>
<p>1 <b>us.</b></p> <p>2 Q. In relation to Mr Rimmer, we can see that he was</p> <p>3 convicted of an offence.</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Did you not think:</p> <p>6 "Well, hold on, I am being told here that Mr Totton</p> <p>7 has got three warnings, and it doesn't say one way or</p> <p>8 another whether they are a conviction or not. For</p> <p>9 Mr Rimmer the briefing officer has included what is</p> <p>10 obviously conviction information, a distinction is to be</p> <p>11 drawn between them."</p> <p>12 <b>A. I didn't, no.</b></p> <p>13 Q. Did you treat Mr Grainger's, over the page to 1270,</p> <p>14 warnings as conviction based?</p> <p>15 <b>A. No.</b></p> <p>16 Q. Why not?</p> <p>17 <b>A. Because the way it is written.</b></p> <p>18 Q. You mentioned earlier that part of your thought process</p> <p>19 in working on the basis that subjects were engaged in</p> <p>20 armed robberies, conspiring to commit armed robberies,</p> <p>21 meant that they were conspiring to commit armed</p> <p>22 robberies with firearms was because the intent of each</p> <p>23 offender was set out, as conspiracy to commit armed</p> <p>24 robbery.</p> <p>25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 42</p>	<p>1 a Group 1 offender. What did you understand a Group 1</p> <p>2 offender to mean?</p> <p>3 <b>A. Serious violent crimes.</b></p> <p>4 Q. That he had been convicted of serious violent crimes?</p> <p>5 <b>A. No, that he has been highlighted obviously within --</b></p> <p>6 <b>I don't know if it is the division or force wide, that</b></p> <p>7 <b>he was a Group 1 offender.</b></p> <p>8 Q. Did that add to your -- I am not going through all of</p> <p>9 the many serious mistakes in all of this, there is no</p> <p>10 point in going through it. Did that highlight in your</p> <p>11 mind his dangerousness?</p> <p>12 <b>A. Not particularly, no. I was more sort of like looking</b></p> <p>13 <b>at the weapons that he had previously conspired to</b></p> <p>14 <b>commit robberies with firearms.</b></p> <p>15 Q. That was the significant part?</p> <p>16 <b>A. That would have stood out, yes, sir.</b></p> <p>17 Q. Was it an open question as to whether there would be</p> <p>18 a strike that day or not?</p> <p>19 <b>A. Sorry, could you rephrase that?</b></p> <p>20 Q. Yes, was it left open, at the morning briefing, whether</p> <p>21 there was going to be a strike that day or not?</p> <p>22 <b>A. We just turned up and we would be directed by the TFC,</b></p> <p>23 <b>so we wouldn't know whether the intelligence picture</b></p> <p>24 <b>would develop and whether we would put some sort of</b></p> <p>25 <b>intervention in.</b></p> <p style="text-align: center;">Page 44</p>

<p>1 Q. Was there a working assumption that today was going to 2 be a day on which a strike occurred? 3 <b>A. No, sir.</b> 4 Q. If you just look at tab 2 of your bundle, please. 5 <b>A. Yes, sir.</b> 6 Q. Your handwritten account, third line: 7 "We were briefed about the suspect vehicle to be the 8 subject of a MASTS strike." 9 Do you see that? 10 <b>A. Yes, sir.</b> 11 Q. It may be just the use of language here, but that may 12 suggest that you believed that the vehicle was to be the 13 subject of a MASTS strike. 14 <b>A. There was no pre-determination of whether we were going 15 to put an intervention in or not.</b> 16 Q. In fairness in the next paragraph you say it was 17 anticipated that if the MASTS strike would occur, it 18 would happen in the Culcheth area -- 19 <b>A. Yes, sir.</b> 20 Q. -- which is more conditional. 21 <b>A. Yes, sir.</b> 22 Q. Is that just a little odd use of language there? 23 <b>A. It appears to be, sir.</b> 24 Q. Yes. 25 After the briefing you went to Leigh police station;</p> <p style="text-align: center;">Page 45</p>	<p>1 <b>A. Yes, sir.</b> 2 Q. The first thing is that it was you raising it; is that 3 right? 4 <b>A. Yes, sir.</b> 5 Q. Where did you get the knowledge of the bank robbery in 6 Bolton from? 7 <b>A. It is either from someone telling me from a risk 8 assessment meeting or having looked at the transcripts 9 of briefings, we were told that on 1 February, that 10 Mr Totton was somehow linked to planning robberies where 11 firearms had been discharged.</b> 12 THE CHAIRMAN: What day did you give, sorry? 13 <b>A. 1 February.</b> 14 THE CHAIRMAN: 1 February. 15 MR BEER: You said, "Having looked at the transcripts of the 16 briefings"? 17 <b>A. Yes, sir.</b> 18 Q. Are you referring, if we go to bundle 1, general 19 firearms. 20 No, it will be a separate file, the general firearms 21 folders. 22 Can you see the recording of, it is said 23 an interview but it is the briefing on -- 24 <b>A. Sorry, sir, which tab?</b> 25 Q. Sorry, tab 16.</p> <p style="text-align: center;">Page 47</p>
<p>1 is that right? 2 <b>A. Yes, sir.</b> 3 Q. You stayed there for 11 or so hours before you were 4 deployed? 5 <b>A. Yes.</b> 6 Q. In the course of the lay up at Leigh police station was 7 there a discussion between you and another officer or 8 officers about a group of offenders being involved in 9 a robbery in Bolton -- 10 <b>A. Yes, sir.</b> 11 Q. -- when a firearms was discharged at officers? 12 <b>A. Yes, sir.</b> 13 Q. To what extent do you work, as a firearms officer, on 14 the basis of what you were told in an official briefing 15 or do you take into account chatter amongst you and the 16 other officers outside of the briefing? 17 <b>A. The official briefing, that is what we rely on.</b> 18 Q. If we look, please at tab 1 of the bundle, at page 268. 19 In the fourth paragraph you say: 20 "It was within my knowledge that this group of 21 offenders were in some way linked to an armed robbery at 22 a bank in Bolton where one offender had opened fire on 23 an attending police patrol with a shotgun. This was 24 discussed at some point during the afternoon." 25 Is that right, is that what happened?</p> <p style="text-align: center;">Page 46</p>	<p>1 <b>A. Yes, sir.</b> 2 Q. Can you see this is a briefing by Mr Hankinson, the 3 TFC -- 4 <b>A. Yes, sir.</b> 5 Q. -- and G1 as the OFC? 6 <b>A. Yes, sir.</b> 7 Q. Yes? Is that the briefing that you are referring to? 8 <b>A. That the one I was present on, yes, sir.</b> 9 Q. Can you see your name given two lines from the bottom? 10 <b>A. Yes.</b> 11 Q. I think you say that in the course of this briefing, the 12 Bolton robbery was mentioned? 13 <b>A. A robbery was mentioned.</b> 14 Q. I can't see that. 15 <b>A. On page 1148.</b> 16 Q. Yes, I am there. 17 <b>A. "Although there is no specific information in relation 18 to the use of firearms in this operation, subject 1 ..."</b> 19 Q. Yes, six lines in. 20 <b>A. "... has previous markings for a shotgun ..."</b> 21 <b>And it goes on to say:</b> 22 <b>"Intelligence also links subject 1 to the planning 23 and preparatory phases of armed robberies in the 24 north-west area whereupon firearms have been discharged, 25 on one occasion at the police."</b></p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

1 Q. That doesn't say that this group of offenders was linked  
 2 to an armed robbery at a bank in Bolton where  
 3 an offender had opened fire on a police officer with  
 4 a shotgun, does it?  
 5 **A. No, that is why I believe the information has possibly**  
 6 **come from a risk assessment meeting that was held at the**  
 7 **outset of Operation Shire.**  
 8 Q. Hold on, were you a risk assessor?  
 9 **A. No.**  
 10 Q. Did you attend any risk assessment meetings?  
 11 **A. No.**  
 12 Q. This, as far as I can see, is not mentioned on any of  
 13 the PowerPoints, the information that you give in your  
 14 witness statement, on any of the PowerPoints or in any  
 15 of the recordings of the briefings that we have. You  
 16 obtained it from a risk assessment meeting, how did that  
 17 happen?  
 18 **A. No, there has been a conversation. I can only assume,**  
 19 **I can't remember, but I can only assume there was**  
 20 **a conversation when someone has been to a risk**  
 21 **assessment meeting and got the information regarding**  
 22 **this organised crime group, and that conversation has**  
 23 **been held in the operations team and I have been given**  
 24 **the knowledge that this bank robbery occurred in Bolton.**  
 25 Q. Which risk assessment meeting was it?

Page 49

1 **A. I presume it is going to be the outset of**  
 2 **Operation Shire.**  
 3 Q. And what, this was just something you overheard?  
 4 **A. It is probably from discussion within the office.**  
 5 Q. With who?  
 6 **A. With whoever had been to the risk assessment meeting.**  
 7 Q. But tell us, who was it?  
 8 **A. I can't remember.**  
 9 Q. Why would you be discussing a risk assessment meeting  
 10 with somebody in the office who you cannot remember?  
 11 **A. Because they were probably putting the operation**  
 12 **together for Operation Shire.**  
 13 Q. Why would they be telling you about it?  
 14 **A. Because I am part of the operations team.**  
 15 Q. But not deployed on the operation that they were risk  
 16 assessing, or was it an operation that you were then  
 17 deployed on?  
 18 **A. Well, ultimately I was deployed on it, yes.**  
 19 Q. But then not told about it in the course the briefing?  
 20 **A. No, the operation -- obviously the briefings came at**  
 21 **various stages throughout the operation. It was**  
 22 **an ongoing operation over a period of months with**  
 23 **various briefings so at the outset that is when I have**  
 24 **got this information that this bank robbery had taken**  
 25 **place.**

Page 50

1 Q. What do you mean "at the outset"?  
 2 **A. When the Operation Shire was initiated with the firearms**  
 3 **department.**  
 4 Q. When was that?  
 5 **A. The start of December I think it was.**  
 6 Q. Okay, so at the start of December, when they are putting  
 7 together a PowerPoint presentation, yes?  
 8 **A. Yes.**  
 9 Q. Somebody has spoken about a robbery in Bolton?  
 10 **A. Yes.**  
 11 Q. They have done that because they have attended a risk  
 12 assessment meeting, yes?  
 13 **A. Yes.**  
 14 Q. You were part a firearms team that was deployed on  
 15 15 December?  
 16 **A. Yes.**  
 17 Q. You weren't told about it on 15 December --  
 18 **A. No.**  
 19 Q. -- in the course of the briefing?  
 20 **A. No.**  
 21 Q. But then, three months later, two and a half months  
 22 later, did you remember back to this conversation  
 23 outside of a formal briefing about a bank robbery in  
 24 Bolton?  
 25 **A. It was a discussion that was raised while we were sat**

Page 51

1 **around Leigh police station. And I remembered that this**  
 2 **OCG has somehow been linked to a bank robbery in Bolton**  
 3 **where firearms had been discharged.**  
 4 Q. Put that volume away, please.  
 5 You say in your interview at B/78, please, the third  
 6 paragraph:  
 7 "The intelligence has come from there, it has been  
 8 discussed on some occasion, which I can't recall  
 9 exactly, when within the operations team and when we are  
 10 held up at Leigh police station, I have brought up this  
 11 information saying, 'I am sure it is this organised  
 12 crime group who are involved!.'  
 13 Why were you sure that it was this organised crime  
 14 group who were involved?  
 15 **A. Because it had been -- the intelligence or the**  
 16 **information I had got was at the outset of**  
 17 **Operation Shire.**  
 18 Q. Then, if you go over the page to page B/79, five  
 19 paragraphs in, you say:  
 20 "Yes, it was discussed in Leigh that I thought these  
 21 were involved and I think it was X7 said, 'Well no,  
 22 because the actual subjects who committed that robbery  
 23 have been convicted!.'  
 24 Is that right, that X7 was saying to you, "Well, no,  
 25 what you are saying, Q9, is incorrect, because the

Page 52

1 actual subjects who committed that robbery have been  
 2 convicted"? Is that what happened?  
 3 **A. They may well have been convicted -- that is what**  
 4 **happened. They may well have been convicted, but I was**  
 5 **talking about the greater organised crime group.**  
 6 Q. No. In the discussion at Leigh police station when you  
 7 are sitting around waiting for something to happen, you  
 8 were saying, "I am sure these subjects were involved in  
 9 a robbery in Bolton in 2000", and X7 is saying, "No, the  
 10 actual subjects who committed that robbery have been  
 11 convicted". Is that what happened?  
 12 **A. Yes, but I wasn't saying it was these subjects, I was**  
 13 **saying somehow the organised crime group was linked.**  
 14 Q. But you say, "I said, 'Well, yeah, perhaps they have  
 15 been convicted, but this was the same organised crime  
 16 group'."  
 17 Wasn't X7 saying to you, "Hold on, don't take that  
 18 into account. The actual subjects who committed that  
 19 robbery have been convicted and it is not these three  
 20 men"?  
 21 **A. He did say that, but I didn't take it into account**  
 22 **if ...**  
 23 Q. Why are you mentioning this at all then?  
 24 **A. What?**  
 25 Q. In this interview here, why are you mentioning these

Page 53

1 three subjects being involved in an armed robbery in  
 2 Bolton in 2000 when a firearm was discharged at a police  
 3 officer. That played no part in your thinking on the  
 4 day?  
 5 **A. Well it was a conversation we had at Leigh police**  
 6 **station, so it was relevant.**  
 7 Q. Did it play any part in your thinking that night?  
 8 **A. No.**  
 9 Q. The fact that these three men had been, on your account,  
 10 part of an OCG that had been involved in an armed  
 11 robbery and a firearm had been fired at police officers  
 12 didn't play on your mind at all?  
 13 **A. No, I went solely off the briefing that I had been**  
 14 **given.**  
 15 Q. Did the fact that X7 was on your account saying, "Hold  
 16 on your information may be wrong here", did that impact  
 17 on you at all or not?  
 18 **A. No.**  
 19 Q. In your accounts you say that you received some  
 20 information that the subjects had been seen near the  
 21 fence line near Sainsbury's with a hacksaw.  
 22 **A. Yes, sir.**  
 23 Q. Was that something that you were told in the course of  
 24 the oral briefing?  
 25 **A. I can't remember, sir.**

Page 54

1 Q. Yes, if we look at firearms volume 2, tab 23.  
 2 **A. Yes, sir.**  
 3 Q. Page 341. Do you have that?  
 4 **A. Yes, sir.**  
 5 Q. By the second hole-punch, X7 says:  
 6 "There is a locked gate there and a padlocked gate  
 7 there. Here on this bush line has got a metal fence  
 8 behind it. They have been seen driving up here and  
 9 a third subject has been seen emerging from this bush  
 10 line here with a hacksaw and getting into the vehicle  
 11 driving off."  
 12 **A. Yes, we were told this.**  
 13 Q. Again, this another false statement. I am not going to  
 14 explore that with you, that had not been observed on the  
 15 evidence we have received. But did it have any effect  
 16 on your subsequent decision to shoot?  
 17 **A. No, sir.**  
 18 Q. What effect, if any, did it have on your impression or  
 19 beliefs as to the enterprise that the subjects may have  
 20 been engaged in?  
 21 **A. That possibly the target premises would have been**  
 22 **Sainsbury's, the strong room at Sainsbury's.**  
 23 Q. Because they had been seen close to it with a hacksaw?  
 24 **A. Yes, sir.**  
 25 Q. On 3 March, before you subsequently moved at State

Page 55

1 Green, did you receive any further intelligence updates?  
 2 **A. Not that I can remember.**  
 3 Q. For the remainder of the day, what did you do at Leigh  
 4 police station?  
 5 **A. As I recall we just sat around and got some lunch,**  
 6 **I think there was some football on the TV. That sort of**  
 7 **thing.**  
 8 Q. Did you sleep at all?  
 9 **A. Probably not, sir.**  
 10 Q. You had, I think, arrived at work at about 4.30. Is  
 11 that right?  
 12 **A. Yes, sir.**  
 13 Q. What time did you have to get up to get to work for  
 14 4.30?  
 15 **A. Probably about 4.00.**  
 16 Q. That's an early start by anyone's measure?  
 17 **A. Well, it is quite a regular sort of occurrence in**  
 18 **firearms, early starts like that.**  
 19 Q. By 7.00 in the evening did you feel fatigued in any way?  
 20 **A. No, sir.**  
 21 MR BEER: Sir, I don't know whether that is a convenient  
 22 moment for the morning break.  
 23 THE CHAIRMAN: Yes, we will take a 10-minute break at this  
 24 stage.  
 25 If you would just like to wait there for a moment,

Page 56

<p>1 Q9, Mrs Shaw will come and fetch you. 2 We will start again at 11.35. 3 (11.26 am) 4 (A short adjournment) 5 (11.42 am) 6 THE CHAIRMAN: Mr Beer, are we now about to move on to 7 events later in the day and particularly what happened 8 on the car park? 9 MR BEER: Sir, yes. 10 THE CHAIRMAN: Q9, I imagine you have already been advised 11 of the position by your counsel but it is my duty to 12 remind you that if at any stage you are asked a question 13 the answer to which may tend to show you may have 14 committed a criminal offence, you are under no 15 obligation to answer it. That warning continues to 16 apply until I say otherwise. You understand the 17 position? 18 <b>A. Yes, sir.</b> 19 THE CHAIRMAN: Good, thank you. 20 MR BEER: Somebody I think has pulled the curtain round. 21 THE CHAIRMAN: Yes. 22 Sue, can you just very carefully move the curtain 23 slightly, one or two people are having difficulty. 24 MR BEER: Thank you very much. 25 I think it is right that in the course of the day</p> <p style="text-align: center;">Page 57</p>	<p>1 "Just before 6.00 pm we were told to make our way to 2 the police vehicles as there was significant movement of 3 the subjects. It was now dark outside but it was 4 a clear and dry evening." 5 <b>A. Yes, sir.</b> 6 Q. The positions in the car, can you tell us who was 7 sitting where? 8 <b>A. W4 was driving, X7 the front passenger, W9 the nearside 9 rear passenger and I was in the rear offside.</b> 10 Q. What were you wearing? 11 <b>A. Jeans and a green smock-type jacket.</b> 12 Q. Was that a strike jacket or not? 13 <b>A. No.</b> 14 Q. On your clothing, did you have any identification that 15 you were a police officer? 16 <b>A. No, we were in plainclothes, sir.</b> 17 Q. At this time, when you left the police station at about 18 6.00, is it right that there wasn't a tactical plan? 19 <b>A. No, we were just moving with surveillance, State Green, 20 so we were moving with surveillance.</b> 21 Q. You say in the next paragraph that at about 6.15 you 22 were given information that the subjects were in a red 23 Audi estate, yes? 24 <b>A. Yes, sir.</b> 25 Q. I think you have told us that this time was taken from</p> <p style="text-align: center;">Page 59</p>
<p>1 after the morning briefing you received no intelligence 2 update that suggested that the subjects would or might 3 be armed? 4 <b>A. No.</b> 5 Q. Nor any update that suggested that the subjects intended 6 to carry out a robbery? 7 <b>A. No.</b> 8 Q. Did you receive any intelligence after about 5.30 pm 9 that the command team did not believe that Robert Rimmer 10 would be in the vehicle if it moved to Culcheth? 11 <b>A. Not that I recall, sir.</b> 12 Q. That would be important information for you to receive? 13 <b>A. Yes, sir.</b> 14 Q. You had been briefed about him as a subject and received 15 a threat assessment about him? 16 <b>A. Yes.</b> 17 Q. If he wasn't there, the threat assessment may change? 18 <b>A. Yes, sir.</b> 19 Q. Did you receive any intelligence update that instead 20 a third male, who was unknown, was in the vehicle? 21 <b>A. Not that I recall.</b> 22 Q. Can we turn to you leaving Leigh police station, please. 23 Your bundle, tab 1. 24 At page 268, four paragraphs from the bottom, you 25 say:</p> <p style="text-align: center;">Page 58</p>	<p>1 the flip chart, you think, yes? 2 <b>A. Yes.</b> 3 Q. We know that time to be incorrect. It cannot have been 4 then, the first time that the subjects were in the red 5 Audi, observed, was 6.29. 6 <b>A. Okay.</b> 7 Q. Was it the fact that they were in the red Audi that 8 caused State Green to be declared? 9 <b>A. I believe so, yes, sir.</b> 10 Q. You say you knew from previous intelligence that the 11 vehicle had privacy glass fitted on all of the side 12 windows, yes? 13 <b>A. Yes, sir.</b> 14 Q. What was the previous intelligence -- 15 <b>A. That had been fed in from the surveillance unit, who had 16 had eyes on onto the vehicle.</b> 17 Q. Was that in the course of this operation, ie this day? 18 <b>A. It was in the course of the previous deployments on 19 the -- on Operation Shire.</b> 20 Q. It wasn't today, ie 3 March, that you had received 21 that -- 22 <b>A. No.</b> 23 Q. -- intel, it was on a previous deployment? 24 <b>A. Yes.</b> 25 Q. Do you think that was widely known amongst the AFOs,</p> <p style="text-align: center;">Page 60</p>

<p>1 that the Audi had privacy glass fitted on all of its 2 side windows? 3 <b>A. Yes, sir.</b> 4 Q. I don't think it was mentioned in the briefing on 5 3 March, was it? 6 <b>A. No, sir.</b> 7 Q. When you were interviewed, I am not going to turn it up 8 now, it is B/91, you say that it was discussed at the 9 ops team office. 10 <b>A. Yes, sir.</b> 11 Q. What did you mean by "discussed at the ops team office"? 12 <b>A. It had been fed in from the surveillance unit that this 13 vehicle, the red Audi, had privacy glass on all sides.</b> 14 Q. That is rather different from receiving it in the course 15 of a previous briefing on which you had been deployed? 16 <b>A. Yes, sir.</b> 17 Q. Which was it? A discussion in the ops team office or 18 a previous briefing? 19 <b>A. It was a discussion in the ops team office.</b> 20 Q. You believed that it had privacy glass down both sides, 21 ie front and back windows? 22 <b>A. The side windows, yes, sir.</b> 23 Q. Was that the subject of any discussion with the AFOs in 24 your vehicle when you were subsequently to formulate 25 a plan on how to strike on the vehicle?</p> <p style="text-align: center;">Page 61</p>	<p>1 <b>A. Yes, sir.</b> 2 Q. You say here, in this third paragraph from the bottom: 3 "At 6.15 we were given information that the subjects 4 were in a red Audi." 5 Yes? 6 <b>A. Yes.</b> 7 Q. That rather suggests that you thought that it was the 8 three subjects that you had been briefed about in the 9 morning. 10 <b>A. Yes, sir.</b> 11 Q. Was that the basis on which you were working when you 12 went on to the car park and did what we know that you 13 did? 14 <b>A. Yes.</b> 15 Q. You drove to the Raven Inn; is that right? 16 <b>A. Yes, sir.</b> 17 Q. And laid up there, yes? 18 <b>A. Yes, sir.</b> 19 Q. If we go over the page to page 269, you say: 20 "Whilst here I received information that the 21 subjects' Audi was now on a car park just off 22 Jackson Avenue just to the rear of Sainsbury's." 23 <b>A. Yes, I think that should read "Jackson Lane", sir.</b> 24 Q. Yes. 25 We have been told that that observation, namely the</p> <p style="text-align: center;">Page 63</p>
<p>1 <b>A. Yes, sir.</b> 2 Q. Presumably because having privacy glass on all of the 3 side windows is an important feature of the operation? 4 <b>A. Yes, sir.</b> 5 Q. It makes your job much harder? 6 <b>A. It would do, sir, yes.</b> 7 Q. You cannot see the subjects from the sides, whereas the 8 subjects may be able to see you? 9 <b>A. Yes, sir.</b> 10 Q. When was it discussed amongst the AFOs that it had 11 privacy glass fitted on all the side windows? 12 <b>A. On the night?</b> 13 Q. Yes. 14 <b>A. At some point in the car, when I was formulating my 15 plan.</b> 16 Q. Was that therefore just those in the alpha car? 17 <b>A. It possibly would have been, yes.</b> 18 Q. Was that with X7 participating? 19 <b>A. As I remember, yes, sir.</b> 20 Q. What was the impact of this knowledge that it had 21 privacy glass on all four side windows, effectively? 22 <b>A. They agreed my tactical plan was sound.</b> 23 Q. Your tactical plan, this was -- we are going to come to 24 it in a moment -- to stay in the vehicle and provide 25 cover from the rear offside seat?</p> <p style="text-align: center;">Page 62</p>	<p>1 car going on to the car park and parking up, was at 2 6.45 pm. Does that sound about right? 3 <b>A. I would be guessing, sir.</b> 4 Q. Were you told at this time that the vehicle was parked? 5 <b>A. I believe so, yes, sir.</b> 6 Q. Were you told at this time the position of the vehicle, 7 namely that it was in the last space on the right? 8 <b>A. Not that I recall.</b> 9 Q. Were you told that it was facing out, the vehicle, 10 ie its nose was pointing out of the parking space? 11 <b>A. Not at that point.</b> 12 Q. You were told, it seems, it was not known whether the 13 subjects were within the vehicle? 14 <b>A. Yes, sir.</b> 15 Q. No doubt that was of great concern? 16 <b>A. It was, yes, of concern.</b> 17 Q. Were you aware that there had been or there was to be 18 a loss of surveillance on the subjects for about 19 13 minutes or so? 20 <b>A. I know the -- they had loss the eyeball on the subjects, 21 but I didn't know what length of time it was.</b> 22 Q. What was the nature of the traffic coming over the main 23 set in the car from the DSU about the loss of eyeball? 24 <b>A. I can't recall.</b> 25 Q. Was there some frustration from the firearms commanders</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)



<p>1 about the loss of eyeball?</p> <p>2 <b>A. Frustration as in?</b></p> <p>3 Q. "This is not really how it is supposed to happen ...</p> <p>4 "This is not really going according to plan ...</p> <p>5 "We cannot see our subjects, they may have got out</p> <p>6 of the car and be committing a robbery under our noses</p> <p>7 ...</p> <p>8 "We cannot see them ..."</p> <p>9 <b>A. Described like that, frustration, yes, possibly.</b></p> <p>10 Q. Was there an imperative that you heard broadcast over</p> <p>11 the radio to get eyeball on the subjects?</p> <p>12 <b>A. I can't remember.</b></p> <p>13 Q. Can you recall two attempts made by surveillance</p> <p>14 officers to ascertain whether the subjects were still</p> <p>15 inside the vehicle?</p> <p>16 <b>A. I remember one of the surveillance officers was going to</b></p> <p>17 <b>drive on to the car park and –</b></p> <p>18 Q. You don't remember another one, a walk on?</p> <p>19 <b>A. No.</b></p> <p>20 Q. No. Did that surveillance officer, the drive on,</p> <p>21 ascertain something about the subjects and the vehicle?</p> <p>22 <b>A. I think he said that there were still occupants within</b></p> <p>23 <b>the vehicle.</b></p> <p>24 Q. Well, if you just look at your statement. In the third</p> <p>25 paragraph on page 269, you say:</p> <p style="text-align: center;">Page 65</p>	<p>1 Q. How far along your journey towards the car park was it?</p> <p>2 <b>A. I can't remember, sir.</b></p> <p>3 Q. At some point in the journey to the car park you</p> <p>4 formulated a plan; is that right?</p> <p>5 <b>A. Yes, sir.</b></p> <p>6 Q. You say in the second paragraph from the bottom there:</p> <p>7 "I started to formulate a plan in my head about how</p> <p>8 I would deploy on to this vehicle."</p> <p>9 Yes?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. You describe what that was:</p> <p>12 "I quickly realised the best option for me would be</p> <p>13 to cover from the rear offside seat of our vehicle."</p> <p>14 Yes?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. This is all about the position that you would adopt,</p> <p>17 yes?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. You would stay in the vehicle, not deploy?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. You would provide cover from a static position from the</p> <p>22 rear offside passenger seat?</p> <p>23 <b>A. Yes, sir.</b></p> <p>24 Q. Yes?</p> <p>25 What other discussion was there in the alpha vehicle</p> <p style="text-align: center;">Page 67</p>
<p>1 "After a while it was ascertained that the subjects</p> <p>2 were inside the vehicle and State Amber was declared."</p> <p>3 Yes?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. So the broadcast that you received wasn't so much</p> <p>6 whether there was someone in the car, it was the</p> <p>7 subjects that were in the car, yes?</p> <p>8 <b>A. Yes, sir.</b></p> <p>9 Q. Your recollection is that you were told that the three</p> <p>10 subjects were still in the car?</p> <p>11 <b>A. Yes, sir.</b></p> <p>12 Q. You say here:</p> <p>13 "The alpha, bravo and charlie vehicles left the car</p> <p>14 park and headed towards Culcheth village centre. During</p> <p>15 this journey a full description was given over the radio</p> <p>16 as to exactly where the vehicle was parked on the car</p> <p>17 park, namely last bay on the right-hand side as you</p> <p>18 entered in off Jackson Avenue, parked with its front</p> <p>19 facing outwards."</p> <p>20 Yes?</p> <p>21 <b>A. Yes, sir.</b></p> <p>22 Q. Where on the journey to the car park was that precise</p> <p>23 description of the location of the Audi broadcast?</p> <p>24 <b>A. I think it was as we were leaving or as we had gone into</b></p> <p>25 <b>the road system away from the Raven public house.</b></p> <p style="text-align: center;">Page 66</p>	<p>1 about the tactics that were to be adopted?</p> <p>2 <b>A. I believe X7 and W4, following the picture paint from</b></p> <p>3 <b>surveillance decided that they were just going to</b></p> <p>4 <b>basically T-bone the Audi and that was relayed by X7 to</b></p> <p>5 <b>the rest of the team, as far as I remember.</b></p> <p>6 Q. You remember that now?</p> <p>7 <b>A. Well, he had basically decided he was going to tell the</b></p> <p>8 <b>team that we were going to T-bone the Audi.</b></p> <p>9 Q. If you take out bundle B, please, at page 50, and just</p> <p>10 start at the bottom of 49 actually so you get some</p> <p>11 context, you are asked:</p> <p>12 "So what was, what was actually, when the strike is</p> <p>13 called, what do you have to do sort of prepare for the</p> <p>14 strike?"</p> <p>15 You say:</p> <p>16 "Well, they will give condition Red, and then</p> <p>17 persons in each of the cars will either be putting</p> <p>18 respirators, preparing themselves obviously to alight</p> <p>19 from the vehicle."</p> <p>20 Then you are asked:</p> <p>21 "Okay, we discussed previously you had</p> <p>22 a conversation with X7 that you covered the vehicle from</p> <p>23 the back seat of your car."</p> <p>24 Then you are asked this:</p> <p>25 "What other tactics were discussed about the</p> <p style="text-align: center;">Page 68</p>

<p>1 deployment from the vehicle?"</p> <p>2 You say:</p> <p>3 "I am sorry, I don't know.</p> <p>4 Then you are asked:</p> <p>5 "X7 tactics about who else was deployed to the</p> <p>6 vehicle and who would take what role. So you have got</p> <p>7 the driver, the front seat passenger and I am assuming</p> <p>8 there is a rear seat passenger as well as yourself. Was</p> <p>9 there any discussion really about how they would deploy</p> <p>10 from the vehicle, the tactics they would deploy as they</p> <p>11 left the vehicle?"</p> <p>12 And you say:</p> <p>13 "I am not sure."</p> <p>14 Yes?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Did you say, "I am sorry, I don't know, and I am not</p> <p>17 sure" because there was no such discussion about where</p> <p>18 the other officers would deploy to?</p> <p>19 <b>A. As I remember, X7 was using the handheld TAC comms to</b></p> <p>20 <b>relay instructions to the other cars which were</b></p> <p>21 <b>following us.</b></p> <p>22 Q. Sorry, say that again?</p> <p>23 <b>A. As I remember, X7 used his handheld comms, the TAC</b></p> <p>24 <b>comms, to basically relay instructions to the cars that</b></p> <p>25 <b>were following us and also tell them what we were going</b></p> <p style="text-align: center;">Page 69</p>	<p>1 some timings think is about 28 minutes, half an hour or</p> <p>2 so.</p> <p>3 <b>A. Okay.</b></p> <p>4 Q. Assume that timing is right, was there any discussion</p> <p>5 about whether the subjects ought to be allowed to get</p> <p>6 out of the vehicle before the strike was called?</p> <p>7 <b>A. No.</b></p> <p>8 Q. What would you say about that as an option?</p> <p>9 <b>A. To let them get out of the vehicle? It potentially</b></p> <p>10 <b>would make it difficult if they were going towards like</b></p> <p>11 <b>the public area of Culcheth.</b></p> <p>12 Q. You wouldn't consider it to be the safest option?</p> <p>13 <b>A. It is not the best -- it is an option, but it is not the</b></p> <p>14 <b>best option.</b></p> <p>15 Q. Just explain in a little more detail why it is not the</p> <p>16 best or the safest option?</p> <p>17 <b>A. Because they are not in a controlled environment and you</b></p> <p>18 <b>have got potentially members of the public around them,</b></p> <p>19 <b>and potentially they are going to be put in harm's way.</b></p> <p>20 <b>It would be more risk to the public.</b></p> <p>21 Q. If you just look at the general firearms bundle,</p> <p>22 volume 2, please, and look at tab 21, at page 1181.</p> <p>23 <b>A. Yes, sir.</b></p> <p>24 Q. This is a transcript of the briefing the previous day,</p> <p>25 2 March. You weren't present, yes?</p> <p style="text-align: center;">Page 71</p>
<p>1 <b>to do on the car park, ie T-bone the Audi.</b></p> <p>2 Q. You believe that X7 did announce that fact over the</p> <p>3 radio to the other cars?</p> <p>4 <b>A. Yes, sir.</b></p> <p>5 Q. Was there any discussion about what X7 and W9 would do?</p> <p>6 <b>A. As in?</b></p> <p>7 Q. Yes, when they got to the scene.</p> <p>8 <b>A. I presume so.</b></p> <p>9 Q. You say here, and this was a month and a bit after the</p> <p>10 event, "I don't know" and, "I am not sure". Yes?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Was there any discussion about where X7 and W9 would go?</p> <p>13 <b>A. In the vehicle or over the comms?</b></p> <p>14 Q. Either, or both in fact.</p> <p>15 <b>A. As far as I remember, there was some discussion about</b></p> <p>16 <b>what the plan was around the vehicle.</b></p> <p>17 Q. Why, if that is the case, weren't you able to say it</p> <p>18 a month afterwards?</p> <p>19 <b>A. I don't know, sir.</b></p> <p>20 Q. Were you unable to say it a month or so after the</p> <p>21 incident because you knew that there was no discussion</p> <p>22 about where X7 and W9 would go?</p> <p>23 <b>A. No.</b></p> <p>24 Q. In the time between you were told that the car was</p> <p>25 parked up on the car park, and the strike, which we on</p> <p style="text-align: center;">Page 70</p>	<p>1 <b>A. No, sir.</b></p> <p>2 Q. I just want to ask you about something that X7 says. Do</p> <p>3 you see the largest paragraph, the second paragraph</p> <p>4 there?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. X7 says, six lines from the end:</p> <p>7 "It may be appropriate that they are getting on to</p> <p>8 the plot, so if that is the case and we can't get close</p> <p>9 to them, we will let them deploy. As it stands there is</p> <p>10 no threat to any individuals as far as we are aware, so</p> <p>11 we may well be the safest option is to let them deploy</p> <p>12 on foot and we conduct any strike there."</p> <p>13 Yes?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Can you understand the logic of what X7 is saying?</p> <p>16 <b>A. Potentially, because it would be difficult to put</b></p> <p>17 <b>a MASTS intervention in en route to Culcheth because of</b></p> <p>18 <b>the nature of the roads.</b></p> <p>19 Q. He is saying that if we not get close to them because of</p> <p>20 the nature of the roads on the way to Culcheth --</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. -- it may be best to let them get on to the plot, yes?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Which I think on this occasion also was judged to be the</p> <p>25 car park.</p> <p style="text-align: center;">Page 72</p>

1 He then says:  
 2 "... it may well be the safest option is to let them  
 3 deploy on foot and we conduct any strike there."  
 4 Yes?  
 5 **A. Yes.**  
 6 Q. Can you understand the logic of what X7 is saying in  
 7 that part of the briefing?  
 8 **A. I can understand what he is saying, but I don't agree**  
 9 **with it.**  
 10 Q. Your understanding of what he is saying is that it may  
 11 well be that the safest option is to let the subjects  
 12 get out of the car?  
 13 **A. I understand that is what he is saying, yes.**  
 14 Q. But you disagree with the operational firearms  
 15 commander?  
 16 **A. I disagree with that rationale.**  
 17 Q. Was there any equivalent discussion the following day,  
 18 after all it is X7 that is sitting in the row in front  
 19 of you in the car, isn't he?  
 20 **A. Yes.**  
 21 Q. Was there any equivalent discussion the next day from  
 22 X7, it is the same man?  
 23 **A. Yes.**  
 24 Q. The safest option may be to let them get out?  
 25 **A. No.**

Page 73

1 Q. Can you think why it may be safer or the advantages of  
 2 letting people out of a vehicle first?  
 3 **A. They are just more difficult to control if they are on**  
 4 **foot, obviously --**  
 5 Q. Look at it the other way round. Are there some  
 6 advantages, are there plus points, for letting people  
 7 get out of the vehicle?  
 8 **A. Not that I can think of.**  
 9 Q. Well you can see all of their bodies potentially, can't  
 10 you?  
 11 **A. Potentially, yes.**  
 12 Q. You can see their hands?  
 13 **A. Potentially, yes.**  
 14 Q. They don't have any ballistic protection of the vehicle?  
 15 **A. I wouldn't have thought the vehicle would -- it is not**  
 16 **an armoured vehicle, it wouldn't given them ballistic**  
 17 **protection.**  
 18 Q. Any other advantages, thinking along the lines that I am  
 19 thinking, that X7 may have been thinking here? I am  
 20 looking at you as a national firearms instructor to say  
 21 whether you can think of any reasons why it might have  
 22 been assessed by X7 that the safest option is to let  
 23 people get out of the car?  
 24 **A. Potentially if you can challenge from distance and**  
 25 **potentially obtain hard cover.**

Page 74

1 Q. Okay, so challenge from distance, what do you mean by  
 2 that?  
 3 **A. Well, challenge the subject at distance. So rather than**  
 4 **up close and personal, you could challenge them from**  
 5 **a distance.**  
 6 Q. Okay.  
 7 Cover as well?  
 8 **A. Ballistic cover, yes.**  
 9 Q. What do you mean by that?  
 10 **A. If you need to take ballistic cover behind a wall or**  
 11 **something which is going to stop a round then**  
 12 **potentially, depending on the environment, that would**  
 13 **potentially be an option.**  
 14 Q. Then the disadvantages of letting them get out, you lose  
 15 a certain control over them?  
 16 **A. Yes, there is no control, certainly with three subjects**  
 17 **you have no control.**  
 18 Q. Other disadvantages?  
 19 **A. You know, fleeing on foot.**  
 20 Q. That is a sort of subset of the first one, isn't it?  
 21 **A. Yes.**  
 22 Q. I suppose the timing of the intervention has to be much  
 23 more precise, hasn't it, if you are going to put the  
 24 strike in as they get out of the vehicle?  
 25 **A. Yes.**

Page 75

1 Q. Yes?  
 2 **A. Yes.**  
 3 Q. So it requires some close surveillance of them --  
 4 **A. It would do, yes.**  
 5 Q. -- to know when they are getting out?  
 6 **A. And a suitable lay up point nearby, as well.**  
 7 THE CHAIRMAN: Sorry?  
 8 **A. A suitable lay up point nearby, somewhere where the**  
 9 **firearms assets can wait.**  
 10 MR BEER: You have got to have a covert location, reasonably  
 11 proximate, that when the strike is called you can get  
 12 there very quickly?  
 13 **A. Yes.**  
 14 Q. To your recollection there wasn't the kind of discussion  
 15 that we are having now on the day?  
 16 **A. No.**  
 17 Q. Okay.  
 18 Your plan I think was developed as you drove towards  
 19 the car park; is that right?  
 20 **A. It was, sir, yes.**  
 21 Q. The suggestions were coming from you to X7, not the  
 22 other way round. Is that right?  
 23 **A. Yes.**  
 24 Q. It was you formulating the plan not X7?  
 25 **A. Yes.**

Page 76

1 Q. This was done at a very late stage; wasn't it?  
 2 **A. Yes.**  
 3 Q. What would have been done if there was disagreement  
 4 between you?  
 5 **A. Then I would have just reverted to role and alighted**  
 6 **from the vehicle.**  
 7 Q. But there wasn't such disagreement, X7 agreed with your  
 8 plan. Is that right?  
 9 **A. Yes.**  
 10 Q. There had been no rehearsal of the plan; is that right?  
 11 **A. Yes.**  
 12 Q. There had been no decision to delay the strike to allow  
 13 for any such rehearsal?  
 14 **A. It wasn't a suitable location or time to rehearse.**  
 15 Q. How was your plan, you were going to stay in the vehicle  
 16 and provide cover, communicated to the bravo, charlie  
 17 and delta cars?  
 18 **A. I don't think it was, sir.**  
 19 Q. There is certainly no mention of such communication in  
 20 any of your statements I don't think, is there?  
 21 **A. No.**  
 22 Q. It really ought to have been communicated, oughtn't it?  
 23 **A. Not necessarily, sir.**  
 24 Q. Why not?  
 25 **A. Because it is me, my plan, and as I say, I've got**

Page 77

1 **control over the situation in front of me.**  
 2 Q. Wouldn't, for the sake of a few words, it be better that  
 3 firearms officers that were going to be running on to  
 4 the subject vehicle to know that you were staying in the  
 5 car, covering it from a static position?  
 6 **A. Yes, it would be beneficial, I suppose, yes.**  
 7 Q. Because at least they would know, for example, not to  
 8 run into your arc?  
 9 **A. Yes, sir.**  
 10 Q. They might know that at least there is cover being  
 11 provided from somebody who is not outside the vehicle?  
 12 **A. Yes.**  
 13 Q. If there is a threat from at least those in the front  
 14 seats of the vehicle, it is being covered by someone,  
 15 even though we can't see them?  
 16 **A. Yes.**  
 17 Q. There came a time when State Red was called; is that  
 18 right?  
 19 **A. Yes, sir.**  
 20 Q. Before State Red was called, had you put a baseball cap  
 21 on?  
 22 **A. Yes, sir.**  
 23 Q. Had you adjusted your seating position?  
 24 **A. Yes, sir.**  
 25 Q. Describe, please, to us the seating position that you

Page 78

1 adopted?  
 2 **A. I was on my knee, knees in the seat, sat back on my**  
 3 **heel, left foot into the footwell.**  
 4 Q. One was a straight leg or near straight leg, the left  
 5 leg, into the rear passenger footwell --  
 6 **A. Yes.**  
 7 Q. -- and one was your knee on the fabric of the seat with  
 8 your lower leg tucked under yourself. Is that right?  
 9 **A. Yes. Yes.**  
 10 Q. Why did you adopt that position?  
 11 **A. To allow me to turn my upper body to face the window.**  
 12 Q. Did you make a decision not to wear your respirator?  
 13 **A. Yes.**  
 14 Q. I think you had been instructed in the morning briefing  
 15 that all officers should wear their PPE, including their  
 16 respirators. Is that right?  
 17 **A. Yes.**  
 18 Q. Why did you not follow the instruction?  
 19 **A. Because I wasn't going to the vehicle.**  
 20 Q. Was the instruction only limited to those officers that  
 21 were going to the vehicle?  
 22 **A. If they were going to come in contact with the CS**  
 23 **dispersal canister or the CS from the dispersal**  
 24 **canister.**  
 25 Q. Is that what the instruction said or did it say, "All

Page 79

1 officers should wear PPE"?  
 2 **A. I think the instruction was, "All officers should wear**  
 3 **PPE", but we have put some common sense to it.**  
 4 Q. Sorry, say that again?  
 5 **A. We have put some common sense to it.**  
 6 Q. You were not going near the vehicle and you thought if  
 7 CSDC was deployed you wouldn't need the respirator?  
 8 **A. It wouldn't affect me, no, sir.**  
 9 Q. What was your understanding of the intended movements of  
 10 the other occupants of the alpha vehicle as you drove on  
 11 to the car park?  
 12 **A. I believe they would alight from the vehicle and go to**  
 13 **the driver's side.**  
 14 Q. What was your understanding of the intended movements of  
 15 the occupants of the bravo vehicle?  
 16 **A. They were going to cover the nearside.**  
 17 Q. Did you hear that broadcast?  
 18 **A. Not that I can recall. I think it was part of**  
 19 **a discussion within our vehicle.**  
 20 Q. Again, I think it is right that you didn't hear any  
 21 broadcast to tell the bravo car that?  
 22 **A. I am sure that that was put over the TAC comms.**  
 23 Q. You say you are sure. Have you a recollection of it?  
 24 **A. Well, no, it is -- yes, I am assuming that.**  
 25 Q. You are assuming it should have been done?

Page 80

<p>1 <b>A. I am assuming, yes, sir.</b></p> <p>2 Q. At what point in your journey across the car park did</p> <p>3 you lower the rear offside window of the vehicle?</p> <p>4 <b>A. It was about halfway across.</b></p> <p>5 Q. Did you have one hand on your gun and the other hand on</p> <p>6 the window switch?</p> <p>7 <b>A. Yes, sir.</b></p> <p>8 Q. How were you holding your gun?</p> <p>9 <b>A. Right hand holding the pistol grip.</b></p> <p>10 Q. Was that the MP5?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Left hand on the -- was it an electric button?</p> <p>13 <b>A. Yes, just a switch.</b></p> <p>14 Q. As you moved across the car park, did the speed of the</p> <p>15 alpha vehicle increase?</p> <p>16 <b>A. Only slightly, sir.</b></p> <p>17 Q. By the time that you stopped, had you activated the</p> <p>18 window so that it was fully down or as far as it would</p> <p>19 go?</p> <p>20 <b>A. Yes, sir.</b></p> <p>21 Q. As you drove across the car park, could you see the</p> <p>22 subject vehicle?</p> <p>23 <b>A. Yes, sir.</b></p> <p>24 Q. Was it illuminated by the lights of the alpha vehicle?</p> <p>25 <b>A. I believe so, sir, yes.</b></p> <p style="text-align: center;">Page 81</p>	<p>1 <b>A. No.</b></p> <p>2 Q. Were there any interior lights on as far as you could</p> <p>3 see?</p> <p>4 <b>A. No.</b></p> <p>5 Q. The courtesy light or anything like that?</p> <p>6 <b>A. No.</b></p> <p>7 Q. What was the natural lighting like?</p> <p>8 <b>A. It was dark. There were street lights on the main</b></p> <p>9 <b>avenue round the car park which gave some illumination,</b></p> <p>10 <b>but it was pretty dark.</b></p> <p>11 Q. I think over that side of the car park, away from</p> <p>12 Jackson Avenue and Thompson Avenue, there weren't street</p> <p>13 lights. Is that right?</p> <p>14 <b>A. No. I think there was some lighting from the building</b></p> <p>15 <b>at the back.</b></p> <p>16 Q. You mean the rear of the row of shops and restaurants?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. What other weather conditions can you remember?</p> <p>19 <b>A. It was dry.</b></p> <p>20 Q. Not raining and had not rained?</p> <p>21 <b>A. No, not as far as I remember.</b></p> <p>22 Q. Your vehicle then came to a stop; is that right?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Did X7 say or shout anything?</p> <p>25 <b>A. No.</b></p> <p style="text-align: center;">Page 83</p>
<p>1 Q. Could you see whether there were subjects inside the</p> <p>2 vehicle?</p> <p>3 <b>A. Yes, sir. In the front passenger seat and the driver.</b></p> <p>4 Q. Could you then see that in fact that there were not</p> <p>5 tinted windows in the front nearside of the vehicle?</p> <p>6 <b>A. I couldn't recall that.</b></p> <p>7 Q. If you could see the passenger, was that through the</p> <p>8 windscreen or --</p> <p>9 <b>A. Yes, through the windscreen of the subject vehicle.</b></p> <p>10 Q. Yes, well I am talking about as you are driving towards</p> <p>11 it, the vehicle, could you see through the windscreen</p> <p>12 then?</p> <p>13 <b>A. Well as we got close enough to the Audi, yes.</b></p> <p>14 Q. As you were driving towards the Audi, could you see</p> <p>15 through the passenger window?</p> <p>16 <b>A. Not that I recall.</b></p> <p>17 Q. Do you now know that the front passenger windows weren't</p> <p>18 in fact tinted?</p> <p>19 <b>A. I do now.</b></p> <p>20 Q. Did you notice that on the night?</p> <p>21 <b>A. No.</b></p> <p>22 Q. As you drove towards the Audi, were there any obvious</p> <p>23 signs that the engine was running?</p> <p>24 <b>A. Not that I recall, no.</b></p> <p>25 Q. Were the exterior lights of the Audi on?</p> <p style="text-align: center;">Page 82</p>	<p>1 Q. Did you hear the words, "Strike, strike"?</p> <p>2 <b>A. Oh, he may have done, yes, if he has put that over the</b></p> <p>3 <b>radio.</b></p> <p>4 Q. When your vehicle came to a stop, what did you do?</p> <p>5 <b>A. I levelled my MP5 at the window, illuminated the TAC</b></p> <p>6 <b>light.</b></p> <p>7 Q. Stopping there, when you say levelled your MP5, what do</p> <p>8 you mean by "levelled it"?</p> <p>9 <b>A. It was in a low port position and as soon as we stopped</b></p> <p>10 <b>I have levelled it to bring it up to the horizontal.</b></p> <p>11 Q. You are indicating like this as low port? (Indicating)</p> <p>12 <b>A. So the muzzle of the weapon is pointing down.</b></p> <p>13 Q. Yes, so it is held with one hand. Is that right?</p> <p>14 <b>A. Yes, by the pistol grip in my right hand.</b></p> <p>15 Q. In a diagonal, 45-degree angle, down?</p> <p>16 <b>A. Probably 45 degrees, near to vertical.</b></p> <p>17 Q. Do you bring it up with one hand or does your left hand</p> <p>18 come off the electric window switch at this point?</p> <p>19 <b>A. Yes, I had taken -- it is an automatic window so I had</b></p> <p>20 <b>pressed the button and the window was on its way down.</b></p> <p>21 Q. You didn't have to hold it down?</p> <p>22 <b>A. No.</b></p> <p>23 Q. Do you use two hands to bring your weapon up?</p> <p>24 <b>A. One hand and then took a grip of the foregrip with my</b></p> <p>25 <b>left hand.</b></p> <p style="text-align: center;">Page 84</p>

1 Q. You said you levelled it?  
 2 **A. Yes.**  
 3 Q. So on the approximately horizontal?  
 4 **A. Yes.**  
 5 Q. Did you rest it on anything?  
 6 **A. No.**  
 7 Q. So it was being supported by both of your hands?  
 8 **A. It was shoulder mounted, so there is a skeleton stock**  
 9 **which was shoulder mounted.**  
 10 Q. It wasn't in contact with the vehicle in any way?  
 11 **A. No. No. Plus it was on a bungee as well, which is like**  
 12 **a sling.**  
 13 Q. To what extent was it protruding from the exterior of  
 14 the vehicle?  
 15 **A. I would just say probably the muzzle and the TAC light**  
 16 **were proud of the door frame of the door.**  
 17 Q. What, three or four inches something like that?  
 18 **A. At most.**  
 19 Q. Did you say that you illuminated something?  
 20 **A. I activated the -- basically it is a tactical light,**  
 21 **which is on the front of the foregrip, with my left**  
 22 **thumb.**  
 23 Q. I think there are three aiming systems.  
 24 **A. Sighting systems, yes.**  
 25 Q. Sighting, thank you.

Page 85

1 One illumination system, namely the TAC light. Is  
 2 that right?  
 3 **A. Yes.**  
 4 Q. If you describe for us in turn, please, the three  
 5 sighting systems?  
 6 **A. There is iron sights it is called, which is the metal**  
 7 **sights which rest on the top of the weapon.**  
 8 Q. Iron sights are called iron sights because they are made  
 9 of iron?  
 10 **A. Yes, sir.**  
 11 Q. Nothing technical about them. They are two objects  
 12 that, when you align the centres of each of them, will  
 13 give you an aim?  
 14 **A. Yes, sir.**  
 15 Q. The second sighting system?  
 16 **A. I think it is a T1 Aimpoint, which is -- it looks like**  
 17 **in layman's terms a telescopic sight, but it is**  
 18 **basically you look through the reticule and there is**  
 19 **a red dot and that red dot is where your round will**  
 20 **land.**  
 21 Q. The red dot is visible to you through the aiming system;  
 22 is that right?  
 23 **A. That's right, yes.**  
 24 Q. Visible to the person upon whom it lands?  
 25 **A. No.**

Page 86

1 Q. Visible to anyone other than that person, ie to third  
 2 parties?  
 3 **A. No.**  
 4 Q. The third system?  
 5 **A. It is a laser aiming device which is a small laser which**  
 6 **is mounted on the foregrip and activated by a pressel**  
 7 **switch, which is attached to the foregrip.**  
 8 Q. Does that display a green strobe light?  
 9 **A. A strobing light, yes.**  
 10 Q. Strobing in what sense, it is not continuous?  
 11 **A. It is like a flashing moving light, probably about half**  
 12 **a centimetre, maybe a centimetre.**  
 13 Q. Is that visible to either the subject or third parties?  
 14 **A. You would see the dot flashing on the target area.**  
 15 Q. If it was pointed at you, yes, what would you see?  
 16 **A. I would only guess at that, sir, because I have not had**  
 17 **one pointed at me.**  
 18 Q. I think in interview you say it might appear as a green  
 19 haze, is that right?  
 20 **A. I think so, yes, sir.**  
 21 Q. What do you mean by a "green haze"?  
 22 **A. Like a green haze, like a hazy light, nothing, no sharp**  
 23 **light, just a hazy green light.**  
 24 Q. You, I think you said, illuminated the TAC light.  
 25 **A. Yes, sir.**

Page 87

1 Q. Just describe to us what that is?  
 2 **A. In general terms it looks like a torch with a button on**  
 3 **the end of it.**  
 4 Q. Is that mounted on the foregrip?  
 5 **A. Yes, sir.**  
 6 Q. And does that provide a narrow or a diffuse beam of  
 7 light?  
 8 **A. A diffuse.**  
 9 Q. You illuminated that at what?  
 10 **A. At the windscreen of the subject vehicle.**  
 11 Q. What did you see?  
 12 **A. The front two persons in the car, the driver and the**  
 13 **front passenger.**  
 14 Q. At this point had it been broadcast by now that  
 15 Mr Grainger was the driver of the vehicle and Mr Totton  
 16 was the front seat passenger?  
 17 **A. Not that I remember, no, sir.**  
 18 Q. Would that have been information that you would have  
 19 preferred to have had, ie which of your subjects were  
 20 sitting in which position?  
 21 **A. It would have made no difference, sir.**  
 22 Q. Why would it have made no difference?  
 23 **A. Because basically the enterprise we were engaging in,**  
 24 **the threat assessment is for the occupants of the**  
 25 **vehicle.**

Page 88

<p>1 Q. You treat them all as one?</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. They all present the same risk?</p> <p>4 <b>A. Yes, sir.</b></p> <p>5 Q. What was the first thing that you did when the vehicle</p> <p>6 stopped then and the window was down, you brought your</p> <p>7 weapon up to horizontal?</p> <p>8 <b>A. I shouted an armed challenge.</b></p> <p>9 Q. What was the armed challenge?</p> <p>10 <b>A. "Armed police, show me your hands."</b></p> <p>11 Q. Did you say that once or more than once?</p> <p>12 <b>A. Just once.</b></p> <p>13 Q. Before you shouted it, had any other person shouted it?</p> <p>14 <b>A. No.</b></p> <p>15 Q. Before, as we are about to hear, you fired a shot, did</p> <p>16 any other person to your knowledge shout any armed</p> <p>17 challenge?</p> <p>18 <b>A. No.</b></p> <p>19 Q. What, if anything, did the two people in the front seats</p> <p>20 do?</p> <p>21 <b>A. They raised their hands above the dashboard.</b></p> <p>22 Q. Before they raised their hands above the dashboard, how</p> <p>23 much of the upper halves of their bodies could you see?</p> <p>24 <b>A. Just from mid chest upward.</b></p> <p>25 Q. So mid chest, you mean sort of --</p> <p style="text-align: center;">Page 89</p>	<p>1 <b>A. No.</b></p> <p>2 Q. What did he do?</p> <p>3 <b>A. He lowered his right hand in a sudden deliberate</b></p> <p>4 <b>movement down towards his lap.</b></p> <p>5 Q. Can we look, please, at tab 2 of the bundle, your</p> <p>6 bundle, at the second page.</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. By the second hole-punch you say:</p> <p>9 "I saw the driver lower his right hand to his groin</p> <p>10 area."</p> <p>11 Yes?</p> <p>12 <b>A. Yes, sir.</b></p> <p>13 Q. From the position that you were in, you could not see</p> <p>14 his groin area, could you?</p> <p>15 <b>A. No, sir.</b></p> <p>16 Q. If you could not see his groin area, why did you say you</p> <p>17 saw his hand, his right hand, lower to his groin area?</p> <p>18 <b>A. Because that is the direction his hand was going.</b></p> <p>19 Q. You don't say "towards his groin area", you say that he</p> <p>20 lowered his right hand "to his groin area", don't you?</p> <p>21 <b>A. That is what it says in this account, yes.</b></p> <p>22 Q. The accurate statement, if your account is correct, is</p> <p>23 that he lowered his right hand out of your view. Would</p> <p>24 you agree?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 91</p>
<p>1 <b>A. I mean above -- from the sternum upwards.</b></p> <p>2 Q. You are describing there a point here at the sternum?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Were you at approximately the same level as them?</p> <p>5 <b>A. It seemed to be, yes, sir.</b></p> <p>6 Q. Could you see whether either of them was wearing a seat</p> <p>7 belt?</p> <p>8 <b>A. I didn't notice that, sir.</b></p> <p>9 Q. I think you told us that the headlights of the vehicle</p> <p>10 weren't on, so there weren't any lights shining towards</p> <p>11 you?</p> <p>12 <b>A. No.</b></p> <p>13 Q. And the internal lights of the vehicle weren't on, so</p> <p>14 they were only illuminated by the ambient light and your</p> <p>15 TAC light. Is that right?</p> <p>16 <b>A. Yes, sir.</b></p> <p>17 Q. What did Mr Totton do --</p> <p>18 <b>A. In --</b></p> <p>19 Q. -- after the command?</p> <p>20 <b>A. He put his hands up.</b></p> <p>21 Q. What did Mr Grainger do?</p> <p>22 <b>A. He put his hands up.</b></p> <p>23 Q. Did Mr Totton keep his hands up?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. Did Mr Grainger keep his hands up?</p> <p style="text-align: center;">Page 90</p>	<p>1 Q. Did you say this and word it in this fashion because you</p> <p>2 wanted to give the impression that he may have had</p> <p>3 something in his lap?</p> <p>4 <b>A. No.</b></p> <p>5 Q. Why did you word it in this way?</p> <p>6 <b>A. I described this to my legal rep and that is how he has</b></p> <p>7 <b>written it down.</b></p> <p>8 Q. But you checked it and you signed it?</p> <p>9 <b>A. I did, yes.</b></p> <p>10 Q. Why, if the accurate statement would be he lowered his</p> <p>11 hand out of view, did you sign a statement that gives</p> <p>12 the impression that he may be lowering it because he had</p> <p>13 something in his lap?</p> <p>14 <b>A. All I have put on this -- what has been written down for</b></p> <p>15 <b>me on the first account, was that he was lowering his</b></p> <p>16 <b>hand towards his groin area, or to his groin area. That</b></p> <p>17 <b>is the direction his hand was going.</b></p> <p>18 Q. How could you tell that his movement was deliberate?</p> <p>19 <b>A. Because it was sudden and deliberate, it wasn't through</b></p> <p>20 <b>fatigue or uncomfot.</b></p> <p>21 Q. Could you tell the difference between a deliberate and</p> <p>22 an accidental movement?</p> <p>23 <b>A. It was a sudden, deliberate movement.</b></p> <p>24 Q. No, could you tell the difference between a deliberate</p> <p>25 and an accidental movement?</p> <p style="text-align: center;">Page 92</p>

1 **A. Yes, I could do and it was not an accidental movement.**  
 2 Q. Why wasn't it an accidental movement?  
 3 **A. Because it was deliberate, and the speed he did it.**  
 4 Q. It was the speed at which he did it, yes?  
 5 **A. Yes.**  
 6 Q. It was only one hand that he dropped, is that right, his  
 7 right hand?  
 8 **A. Yes, and then his left hand went down also.**  
 9 Q. Hold on, your account says:  
 10 "I saw the driver lower his right hand to his groin  
 11 area. It was a deliberate movement as if to grab  
 12 a firearm. I felt this was a threat to the oncoming  
 13 team so I discharged one shot.  
 14 **A. Yes.**  
 15 Q. You don't give any description of him lowering his left  
 16 hand there, do you?  
 17 **A. No, but his left hand went down also.**  
 18 Q. Why didn't you say so here?  
 19 **A. Because I was describing what his right hand did.**  
 20 Q. Yes, but why were you not describing what his left hand  
 21 did?  
 22 **A. I don't know, I was describing the movement which I felt**  
 23 **was the threatening movement.**  
 24 Q. Hold on, are you telling us that he also dropped his  
 25 left hand before you discharged the shot?

Page 93

1 **A. His left hand was going down when I discharged the shot.**  
 2 Q. Why didn't you say so here?  
 3 **A. Because I was describing the movement of his right hand.**  
 4 Q. Yes, but why were you not describing the movement with  
 5 his left hand?  
 6 **A. Because the threat was coming from his right hand,**  
 7 **because of the speed of the movement.**  
 8 Q. Didn't you think it was important to describe what this  
 9 subject, who by the time you made this statement you  
 10 knew was dead, was doing with both of his hands?  
 11 **A. The threat I deemed at the time was coming from his**  
 12 **right hand, that is why I have described what his right**  
 13 **hand did.**  
 14 Q. Can we turn to B/109, please.  
 15 This is your interview, Q9.  
 16 **A. Yes.**  
 17 Q. Yes?  
 18 About two-thirds of the way down the page, by the  
 19 second hole-punch -- in fact start in the middle to give  
 20 you some context. The interviewer asks you:  
 21 "When you actually discharged your weapon, how did  
 22 Mr Grainger react following that?"  
 23 You say:  
 24 "He slumped back in his seat.  
 25 "Can you tell me what happened to his hands at this

Page 94

1 point?  
 2 "Answer: His hands were dropped.  
 3 "Question: So he dropped both hands?  
 4 "Answer: Both his hands, yeah, his left hand --  
 5 sorry, his right hand went down first towards his lap  
 6 and then his left hand has come down prior to me firing  
 7 the shot."  
 8 Can you see that?  
 9 **A. Yes.**  
 10 Q. "Right, so having been shot, was there any further  
 11 movement?  
 12 "No, not that I can recall."  
 13 Yes?  
 14 **A. Yes.**  
 15 Q. This account here suggests that both of his hands had  
 16 come down prior to you firing the shot.  
 17 **A. Yes.**  
 18 Q. Is that correct?  
 19 **A. As I remember, his left hand was coming down when**  
 20 **I fired.**  
 21 Q. Where was it when you fired?  
 22 **A. It was still in my view, so it would have been just**  
 23 **above the dashboard.**  
 24 Q. Can you look at your account, please, in your witness  
 25 statement in your bundle, tab 1, page 270.

Page 95

1 Can you see the fifth paragraph?  
 2 **A. Yes.**  
 3 Q. "As I covered into the vehicle I saw the driver make  
 4 a sudden and deliberate movement of his right hand from  
 5 my view down towards his lap ..."  
 6 **A. Yes.**  
 7 Q. "... I thought he was reaching for a firearm."  
 8 **A. Yes.**  
 9 Q. You then explain some other things and you say:  
 10 "I placed my finger on the trigger, illuminated the  
 11 laser aiming device and fired one round to the centre  
 12 mass of the driver."  
 13 **A. Yes.**  
 14 Q. In that account, also, you only describe a movement by  
 15 one hand, namely his right hand, don't you?  
 16 **A. Yes.**  
 17 Q. Why is it that in the two accounts that you gave near  
 18 the time, one on the night of the incident and one on  
 19 9 March, you describe only a movement of his right hand,  
 20 not his left?  
 21 **A. Because that was the threat I deemed, which basically**  
 22 **I reacted to.**  
 23 Q. Why do you not describe at all in this seven-page  
 24 account any movement by his left hand?  
 25 **A. Because the relevance was what he did with his right**

Page 96



1 **hand.**  
 2 Q. How long had he had his hands up for before you shot?  
 3 **A. Not a very long time. I would say a second, maybe**  
 4 **longer than that.**  
 5 Q. In your interview, at B/108, about five lines from the  
 6 bottom, you say:  
 7 "Both driver and front seat passenger raised their  
 8 hands above the dashboard for about a second or so, two  
 9 seconds and then the driver has dropped his hand in  
 10 a deliberate movement down to his lap."  
 11 Yes?  
 12 **A. Yes.**  
 13 Q. So a second or two they had their hands up before  
 14 Mr Grainger dropped his right and then his left hand.  
 15 Is that right?  
 16 **A. Yes, sir.**  
 17 Q. How long was there between the vehicle stopping and you  
 18 firing your shot?  
 19 **A. Probably about three, maybe four seconds.**  
 20 Q. That is what you say on the next page, page 109. The  
 21 third line:  
 22 "In between your vehicle actually coming to stop and  
 23 you discharging your weapon, what sort of time period  
 24 are we looking at?"  
 25 You say:

Page 97

1 "Three or four seconds."  
 2 Is that right?  
 3 **A. Yes, sir.**  
 4 Q. Before you fired your shot, had you seen a weapon in  
 5 Mr Grainger's hand?  
 6 **A. No.**  
 7 Q. Had you seen him seek to move his right hand back up  
 8 from where he had lowered it?  
 9 **A. No.**  
 10 Q. Had you seen him move his left hand back up from where  
 11 he was lowering it?  
 12 **A. No.**  
 13 Q. If you look, please, at B/122 to 123. At the foot of  
 14 the page, you are asked the question:  
 15 "Why did you not communicate further or issue  
 16 a further command?"  
 17 Yes?  
 18 **A. Yes.**  
 19 Q. You say:  
 20 "Totton and Grainger had put their hands up.  
 21 Grainger has made a sudden move down to his lap.  
 22 Basically if I had shouted another command of 'Show me  
 23 your hands', then he would potentially, you know, he  
 24 potentially could have grabbed the firearm. He has  
 25 obviously not complied with the command I have initially

Page 98

1 give him because he has gone down to his lap. I thought  
 2 he was grabbing for a firearm so there is no other  
 3 option but to discharge mine."  
 4 Yes?  
 5 **A. Yes.**  
 6 Q. You believed there was no other option but to discharge  
 7 your firearm?  
 8 **A. Yes.**  
 9 Q. Why did you not wait to see whether Mr Grainger in fact  
 10 had anything in his hands?  
 11 **A. Because that would have put the oncoming team in extreme**  
 12 **danger of being fired upon.**  
 13 Q. You had received no intelligence, current intelligence,  
 14 that suggested that Mr Grainger had a firearm, had you?  
 15 **A. No.**  
 16 Q. You had not seen anything in his hands, had you?  
 17 **A. No.**  
 18 Q. You hadn't seen him form his body up in a way as if he  
 19 was going to fire a weapon at anyone, had you?  
 20 **A. No.**  
 21 Q. You had your weapon trained on him, yes?  
 22 **A. Yes.**  
 23 Q. By this time you had illuminated the laser aiming?  
 24 **A. Yes.**  
 25 Q. You had your finger on the trigger guard; is that right?

Page 99

1 **A. Yes.**  
 2 Q. So the time it would take to fire your weapon would be  
 3 the movement of your trigger from the guard to the  
 4 trigger and depressing it?  
 5 **A. Yes.**  
 6 Q. You had him completely covered at this point, didn't  
 7 you?  
 8 **A. I did, yes.**  
 9 Q. It would have taken you less time to fire your weapon  
 10 than it would for Mr Grainger to take out a weapon, to  
 11 ready his weapon, to place his finger on the trigger of  
 12 any weapon and to fire it. Wouldn't it?  
 13 **A. No.**  
 14 Q. Why not?  
 15 **A. I don't know what -- well, the weapon I thought**  
 16 **Anthony Grainger had, I don't know what state it would**  
 17 **have been in and he would have been in a position to**  
 18 **grab the weapon and fire laterally across David Totton**  
 19 **towards the oncoming team or fire upward towards the**  
 20 **driver's door to any other team who were approaching**  
 21 **that direction.**  
 22 Q. You thought he was going to fire blind effectively with  
 23 the weapon down hidden from your view through the skin  
 24 of the vehicle?  
 25 **A. The skin or the window of the vehicle.**

Page 100

1 Q. That was all speculation, wasn't it?  
 2 **A. No.**  
 3 Q. You didn't even know whether he had a weapon, did you?  
 4 **A. I believed he had a firearm.**  
 5 Q. You said in an account that you gave that you had no  
 6 doubt that he had a firearm. Was that your state of  
 7 mind?  
 8 **A. It was, yes.**  
 9 Q. You were sure to the point of certainty?  
 10 **A. Yes, because of his deliberate movement down towards his**  
 11 **groin area.**  
 12 Q. You had no idea where X9 or W9 were, did you?  
 13 **A. No.**  
 14 Q. You didn't know whether Mr Grainger could see them or  
 15 not, did you?  
 16 **A. No, but I knew they would be on their approach to the**  
 17 **vehicle.**  
 18 Q. Well, you explained already that you thought that  
 19 Mr Grainger could shoot X9 and W9, yes?  
 20 **A. Yes.**  
 21 Q. That was the risk?  
 22 **A. Pardon?**  
 23 Q. That was the risk?  
 24 **A. Yes.**  
 25 Q. But you didn't know whether in fact they were in his

Page 101

1 view or not?  
 2 **A. No.**  
 3 Q. Alternatively, you didn't know whether they had him  
 4 covered?  
 5 **A. True, yes.**  
 6 Q. And that they were able to mitigate or eliminate any  
 7 threat that he posed by them covering him, did you?  
 8 **A. No.**  
 9 Q. Can we look, please, at tab 2 of the bundle, your  
 10 bundle, and the second page. We have read it in  
 11 a different context already by the second hole-punch.  
 12 You say:  
 13 "Officers were deploying to the vehicle."  
 14 Yes?  
 15 **A. Yes.**  
 16 Q. You don't say here which officers, do you?  
 17 **A. All the officers would have been deploying to the**  
 18 **vehicle.**  
 19 Q. Here you don't say which officers, do you?  
 20 **A. No.**  
 21 Q. Nor where each of them was?  
 22 **A. No.**  
 23 Q. Is that because at this time you did not see any of them  
 24 near the vehicle?  
 25 **A. In what respect?**

Page 102

1 Q. At the time that you fired your shot, you did not see  
 2 any of your colleagues near the Audi?  
 3 **A. No, I was concentrating on what was going on inside the**  
 4 **car.**  
 5 Q. If we look back at tab 1, please, your first witness  
 6 statement, at page 270, in the middle paragraph, two  
 7 lines in, you say:  
 8 "I quickly realised that the approaching officers  
 9 were in extreme danger."  
 10 Yes?  
 11 **A. Yes, sir.**  
 12 Q. Again, you do not say here which officers, do you?  
 13 **A. No.**  
 14 Q. Nor where each of them was?  
 15 **A. No.**  
 16 Q. You are not in a position to say where X7 was when you  
 17 fired, are you?  
 18 **A. No, just that he was obviously approaching the vehicle.**  
 19 Q. You are not in a position to say whether or not X7 had  
 20 cover on the driver, are you?  
 21 **A. No.**  
 22 Q. W9, you are not in a position to say where he was when  
 23 you fired, are you?  
 24 **A. No.**  
 25 Q. You are not in a position to say whether he had cover on

Page 103

1 the driver or not?  
 2 **A. No.**  
 3 Q. Can we look, please, at B/57.  
 4 The third question in, you are asked:  
 5 "When you say deploying, how far would they have  
 6 been away from the stolen Audi?"  
 7 And you say:  
 8 "I am not sure, which way, which direction they have  
 9 gone. W9 was deploying from the seat next to me on the  
 10 rear and X7 was deploying on the front seat. The  
 11 driver, W4, he stayed in the vehicle so they would have  
 12 gone out of the doors of our vehicle, then round either  
 13 the front or rear of the Audi towards the stolen Audi."  
 14 Yes?  
 15 **A. Yes.**  
 16 Q. You were not in a position when you fired to say where  
 17 each of them was and therefore you are not in a position  
 18 to say whether they were in the line of sight of  
 19 Mr Grainger, are you?  
 20 **A. No.**  
 21 Q. You are not in a position to say whether they were in  
 22 the line of fire of Mr Grainger, are you?  
 23 **A. No, but they were obviously going towards Mr Grainger.**  
 24 Q. You are not in a position to say whether they had even  
 25 emerged from behind the alpha vehicle at the point that

Page 104

<p>1 you fired, are you?</p> <p>2 <b>A. No.</b></p> <p>3 Q. Was it practice at this time when you fired your weapon</p> <p>4 as a police officer to make some declaration or</p> <p>5 statement to that effect out loud, shout?</p> <p>6 <b>A. No, not in those circumstances.</b></p> <p>7 Q. In other circumstances might it be?</p> <p>8 <b>A. If you had a contact from say in a building or open sort</b></p> <p>9 <b>of deployment, you might shout "Contact rear" or</b></p> <p>10 <b>"Contact front".</b></p> <p>11 Q. Does that mean that you are contacting the subjects or</p> <p>12 that they are contacting you?</p> <p>13 <b>A. It would be both ways.</b></p> <p>14 Q. Why wouldn't you declare here that you had fired your</p> <p>15 weapon to let other officers know that the sound of</p> <p>16 a gunshot was because of you firing and not the subjects</p> <p>17 firing?</p> <p>18 <b>A. I was concentrating on what I was doing.</b></p> <p>19 Q. Could it have been something that you did but because of</p> <p>20 the circumstances, namely concentration, you were not</p> <p>21 able to?</p> <p>22 <b>A. Possibly, but it is not something that -- I have not</b></p> <p>23 <b>been in that situation before. So, you know, I wouldn't</b></p> <p>24 <b>have shouted anything, I would concentrate on the job in</b></p> <p>25 <b>hand which was covering the vehicle and covering further</b></p> <p style="text-align: center;">Page 105</p>	<p>1 Q. Did he open the door of the vehicle with his hands above</p> <p>2 his head?</p> <p>3 <b>A. I didn't see him move his hands from above his head.</b></p> <p>4 Q. Having covered the threat from Mr Grainger, surely you</p> <p>5 will want to look at what Mr Totton was doing?</p> <p>6 <b>A. When I looked at Mr Totton, he still had his hands up,</b></p> <p>7 <b>and then I have concentrated back onto Mr Grainger.</b></p> <p>8 <b>Next time I have looked at Totton he was disappearing</b></p> <p>9 <b>out of the vehicle.</b></p> <p>10 Q. You realised he must have lowered his hands to open the</p> <p>11 door?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Why was he not presenting a threat by lowering his hands</p> <p>14 out of view.</p> <p>15 <b>A. I didn't see that.</b></p> <p>16 Q. Can we look at B/58, please.</p> <p>17 Can you see halfway down, you are asked:</p> <p>18 "When was the CS canister deployed into the vehicle?"</p> <p>19 "That was after about 10 seconds, something like</p> <p>20 that. It was after I had shot Anthony Grainger."</p> <p>21 Then you say:</p> <p>22 "I kept cover obviously on Totton, get out of the</p> <p>23 vehicle."</p> <p>24 That is contrary to what you have said here.</p> <p>25 <b>A. I think that is just the way it has been written up.</b></p> <p style="text-align: center;">Page 107</p>
<p>1 <b>movement.</b></p> <p>2 Q. You have been in training situations before, has it ever</p> <p>3 been part of training that if you fire your weapon you</p> <p>4 let other people know that it is the police officer that</p> <p>5 is firing and not the subjects?</p> <p>6 <b>A. Not that I remember, no.</b></p> <p>7 Q. What did Mr Grainger do?</p> <p>8 <b>A. He slumped back in his seat.</b></p> <p>9 Q. Did he make any further movement after slumping back in</p> <p>10 his seat, as far as you could see?</p> <p>11 <b>A. No, only his shoulders seemed to drop slightly.</b></p> <p>12 Q. What did Mr Totton do whilst you were doing this, whilst</p> <p>13 you had shot Mr Grainger?</p> <p>14 <b>A. As I remembered, David Totton still had his hands up and</b></p> <p>15 <b>he was still sat in the front passenger seat.</b></p> <p>16 Q. Did he stay sat in the passenger seat?</p> <p>17 <b>A. For a very brief time, yes.</b></p> <p>18 Q. Then what did he do?</p> <p>19 <b>A. Then he got out of the vehicle.</b></p> <p>20 Q. How did he get out of the vehicle?</p> <p>21 <b>A. He basically -- I didn't see how he got out, I was</b></p> <p>22 <b>covering Anthony Grainger for any further movement and</b></p> <p>23 <b>the next time I looked at Totton he was basically</b></p> <p>24 <b>halfway out of the vehicle, as if crawling on to his</b></p> <p>25 <b>knees.</b></p> <p style="text-align: center;">Page 106</p>	<p>1 <b>I kept cover obviously on, and then Totton got out of</b></p> <p>2 <b>the vehicle --</b></p> <p>3 Q. Hold on, are you saying that this is wrongly</p> <p>4 transcribed?</p> <p>5 <b>A. Just bear with me, sir, while I just read it.</b></p> <p>6 Q. Yes. (Pause)</p> <p>7 <b>A. Yes, it is describing that I had kept cover on, Totton</b></p> <p>8 <b>had got out of the vehicle and I was still covering when</b></p> <p>9 <b>the window of the stolen Audi smashed and the CS</b></p> <p>10 <b>canister was deployed.</b></p> <p>11 Q. It doesn't read like that, does it?</p> <p>12 MR DAVIES: That is a matter of opinion.</p> <p>13 MR BEER: Sorry?</p> <p>14 MR DAVIES: That is a matter of opinion.</p> <p>15 MR BEER: I think if my friend wants to say something he</p> <p>16 should stand up.</p> <p>17 MR DAVIES: This is -- I will. This is, not for the first</p> <p>18 time, a loaded interpretation of language. It is</p> <p>19 a matter of opinion. It is counsel to the Inquiry's</p> <p>20 role to stay neutral.</p> <p>21 MS SCHOFIELD: Yes, exactly.</p> <p>22 THE CHAIRMAN: Please, please leave it to counsel, all</p> <p>23 right? I know it is a difficult time, please leave</p> <p>24 these things to counsel.</p> <p>25 It seems to me, and this is what I was about to ask</p> <p style="text-align: center;">Page 108</p>

<p>1 myself, that the difference the witness is trying to 2 convey is not as the words but as to the punctuation, 3 that needs to be clarified, whether I am right in that. 4 What I think he said was in answer to your last 5 question, Mr Beer: 6 "I kept cover on, Totton got out of the vehicle." 7 That is my recollection. 8 Can you clarify the position for us, please, Q9? 9 <b>A. Yes, that is it, sir.</b> 10 <b>Obviously I kept cover, obviously on. Totton got</b> 11 <b>out of the vehicle and I was still covering into the cab</b> 12 <b>of the vehicle watching Grainger.</b> 13 <b>And then it is quite bizarre really, because then</b> 14 <b>describe the glass breaking.</b> 15 THE CHAIRMAN: Right, if that needs to be checked there will 16 be a tape. 17 MR BEER: Yes, and what I was saying, that is not how it 18 reads, for two reasons. 19 Firstly it doesn't say, "I kept cover obviously on." 20 <b>A. That is probably my language.</b> 21 Q. Secondly, it doesn't say, "Totton got out of the 22 vehicle". It says "get out", doesn't it? But we can 23 check that against the tape, if it is available. 24 Why didn't you keep your weapon trained on Totton? 25 <b>A. Because Grainger still posed a threat. He had made the</b></p> <p style="text-align: center;">Page 109</p>	<p>1 Q. Had you told him to get out of the car? 2 <b>A. No.</b> 3 Q. Had you given him an instruction to show you his hands? 4 <b>A. Initially, yes.</b> 5 Q. Was he therefore disobeying your instruction? 6 <b>A. Yes.</b> 7 Q. Like Mr Grainger had? 8 <b>A. Yes.</b> 9 Q. Given he was disobeying your instruction and he quite 10 possibly could have had a firearm, did you shoot? 11 <b>A. No, because he was getting out of the car.</b> 12 Q. Did you remain covering Mr Grainger? 13 <b>A. Yes.</b> 14 Q. Did you transfer your attention to Mr Totton at any 15 stage? 16 <b>A. No.</b> 17 Q. When was the first moment then that you saw Mr Totton 18 getting out? 19 <b>A. It was as he was getting out.</b> 20 Q. What do you mean "as he was getting out"? 21 <b>A. He was disappearing out of the door, in a stoop</b> 22 <b>position.</b> 23 Q. Did you see any officers approach Mr Totton? 24 <b>A. No.</b> 25 Q. Did at any stage you see the third person in the</p> <p style="text-align: center;">Page 111</p>
<p>1 <b>sudden deliberate movement. I had shot him and didn't</b> 2 <b>know whether the round had been effective.</b> 3 Q. Can you look at page 139, please. When you are asked 4 a similar question at the top of the page, you say: 5 "So that is why I have not engaged Totton or dealt 6 with him, because he was getting out of the car and 7 somebody would have been on aim with a weapon 8 approaching him. So they would have been in a better 9 position to deal with him." 10 <b>A. Yes.</b> 11 Q. Was that the reason that you didn't cover Totton, 12 because you thought that somebody would be on aim on 13 him? 14 <b>A. No, the position when Totton was getting out of the car</b> 15 <b>when I saw him, he was basically going to a crawl on to</b> 16 <b>the floor. So he was not getting out of the vehicle to</b> 17 <b>stand up, he was getting out of the vehicle in a stooped</b> 18 <b>position.</b> 19 Q. When you saw Mr Totton coming out of the car, could you 20 see both of his hands? 21 <b>A. No, I didn't see either of his hands.</b> 22 Q. Did you think he had a firearm because you couldn't see 23 his hands? 24 <b>A. From his position, he quite possibly could have had</b> 25 <b>a firearm, yes.</b></p> <p style="text-align: center;">Page 110</p>	<p>1 vehicle? 2 <b>A. No.</b> 3 Q. Did you see an officer break the window? 4 <b>A. I didn't see him break the window, but I saw the glass</b> 5 <b>smash.</b> 6 Q. Did something then happen? 7 <b>A. Yes, the CS dispersal canister was put into the vehicle.</b> 8 Q. Did the cab become fogged with the CS? 9 <b>A. Yes, sir.</b> 10 Q. Did that mean that you could no longer see the driver at 11 all? 12 <b>A. Yes, my cover role was then redundant.</b> 13 Q. Could you see whether he posed any threat to you? 14 <b>A. No.</b> 15 Q. At this point did you see other officers surround the 16 vehicle? 17 <b>A. Yes, to the nearside, the passenger side.</b> 18 Q. What did you do? 19 <b>A. I then started to get out of the vehicle.</b> 20 Q. Where did you go? 21 <b>A. Out of the rear nearside door.</b> 22 Q. Were you able to get out of that easily or was that 23 blocked by the subject vehicle in any way? 24 <b>A. No, it was the opposite door to where the subject</b> 25 <b>vehicle was.</b></p> <p style="text-align: center;">Page 112</p>

<p>1 Q. I am so sorry. 2 Where did you go? 3 <b>A. Round the back of the police Audi.</b> 4 Q. What did you do? 5 <b>A. I basically went to look to see if there was any work to</b> 6 <b>do, and that is when I saw I think it was an officer,</b> 7 <b>the silhouette of an officer going into the vehicle,</b> 8 <b>into the stolen Audi's passenger seat.</b> 9 Q. Did you hear a shout of "trauma" go up? 10 <b>A. Yes.</b> 11 Q. Did you take out a trauma pack and defibrillator? 12 <b>A. I did, yes.</b> 13 Q. Did you give that to U2? 14 <b>A. Yes.</b> 15 Q. Did other officers provide first aid care to 16 Mr Grainger? 17 <b>A. They did, yes.</b> 18 Q. Did then you go to the back of the alpha vehicle and put 19 a cordon up, effectively? 20 <b>A. I went to speak to X7, who was coming around the front</b> 21 <b>of the police Audi, and made sure that he had contacted</b> 22 <b>an ambulance service.</b> 23 Q. After speaking to G1 about a cordon, did you then go 24 over to the delta vehicle and sit in the delta vehicle? 25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 113</p>	<p>1 <b>A. Quite a while later, yes. I went from the Tactical</b> 2 <b>Firearms Unit after -- well someone unloaded my weapons</b> 3 <b>and then there was a conversation about where the</b> 4 <b>post-incident procedure should carry on.</b> 5 Q. Were you taken to Claytonbrook then? 6 <b>A. Yes.</b> 7 Q. Did you join the other AFOs at Claytonbrook? 8 <b>A. Yes.</b> 9 Q. At Claytonbrook did you speak with any of the other 10 officers about what had happened? 11 <b>A. No.</b> 12 Q. Did you speak about the incident at all? 13 <b>A. No, only to my legal representative.</b> 14 Q. Was that Mr Mackie at that time? 15 <b>A. It was, yes.</b> 16 Q. And did you then subsequently make your initial account? 17 <b>A. Yes, sir.</b> 18 MR BEER: Sir, those are the questions that I have for Q9. 19 THE CHAIRMAN: Thank you. 20 We will break off now until 2.05. 21 Just hang on there a second, please, Q9, until 22 Mrs Shaw has been round. She is going to come and 23 collect you. 24 <b>A. Thank you.</b> 25 THE CHAIRMAN: Thank you.</p> <p style="text-align: center;">Page 115</p>
<p>1 Q. And after 15 minutes or so with two other officers, did 2 you go in a surveillance vehicle back to the TFU? 3 <b>A. Yes, it may have been longer than that but, as</b> 4 <b>I remember, it was around that sort of time.</b> 5 Q. Did the post-incident procedure commence? 6 <b>A. Yes, sir.</b> 7 Q. Were you given any warnings about conferring or not 8 conferring with other officers? 9 <b>A. As I remember, yes, with -- I think it was from Chief</b> 10 <b>Inspector Simpson when I was with him the Tactical</b> 11 <b>Firearms Unit.</b> 12 Q. What did he say to you? 13 <b>A. I can't recall. He was reading from a laminated card</b> 14 <b>and just basically explaining the post-incident</b> 15 <b>procedure.</b> 16 Q. What was the sense of what he was saying to you about 17 conferring? 18 <b>A. Just that don't confer with other officers.</b> 19 Q. Did you confer with any other officers? 20 <b>A. No.</b> 21 Q. Did you speak with any other officers about generally 22 what had happened? 23 <b>A. No.</b> 24 Q. Did you then subsequently join the other AFOs when they 25 came back to the base?</p> <p style="text-align: center;">Page 114</p>	<p>1 Mr Davies, you have commented upon the neutrality of 2 counsel to the Inquiry. I have to say that I see 3 nothing improper in any of the questions which he has 4 asked. 5 May I remind everybody that I made clear in my 6 opening statement on 26 July that counsel to the Inquiry 7 are entitled to probe and test the evidence of witnesses 8 and in appropriate cases challenge it. Indeed I have 9 instructed them so to do where it is appropriate. All 10 right, so I take the view that Mr Beer has simply been 11 following that guidance which I outlined as long ago as 12 last July. 13 All right? 14 MR DAVIES: Yes. 15 THE CHAIRMAN: Thank you. 16 2.05. 17 (1.04 pm) 18 (The Luncheon Adjournment) 19 (2.08 pm) 20 THE CHAIRMAN: Mr Thomas, do you have questions? 21 MR THOMAS: I do, sir. 22 Questions from MR THOMAS 23 MR THOMAS: Good afternoon, Q9. My name is Mr Thomas and 24 I am representing Anthony's family, okay. 25 <b>A. Okay.</b></p> <p style="text-align: center;">Page 116</p>

<p>1 Q. Can I start with after this incident, in the week after 2 this incident, yes. 3 <b>A. Yes.</b> 4 Q. You would have been very concerned about what had 5 happened, yes? 6 <b>A. Of course, yes.</b> 7 Q. This was the first time that you had been involved in 8 a fatality, correct? 9 <b>A. Post-incident, yes, sir.</b> 10 Q. Yes, and you had been told about the importance of not 11 conferring, correct? 12 <b>A. Yes.</b> 13 Q. You knew that process was all important, not just the 14 evidence that you give but how that evidence is taken, 15 who you speak to. You were aware of all of these 16 issues, correct? 17 <b>A. Yes.</b> 18 Q. You don't do your full statement until six days after 19 this incident, correct? 20 <b>A. Yes.</b> 21 Q. The day before, on 8 March, you attend a meeting. 22 <b>A. It wasn't a meeting. Is this with PFOA?</b> 23 Q. Yes. 24 <b>A. Yes.</b> 25 Q. Well, you say it wasn't a meeting, but it was a meeting.</p> <p style="text-align: center;">Page 117</p>	<p>1 Q. So purely welfare issues? 2 <b>A. Yes.</b> 3 Q. Why was post-incident procedure discussed then? 4 <b>A. It wasn't discussed it was just -- well, it was part of 5 it that was discussed, which was the making of our 6 accounts and why we hadn't provided our statements.</b> 7 Q. Forgive me, I will come back. If only welfare was being 8 discussed, what relevance did the post-incident 9 procedure have to do with that? How did it come up? 10 <b>A. Basically the PFOA obviously know a lot about 11 post-incident and it was mentioned and they were just 12 asking questions about why we had not done our fourth 13 accounts -- or the stage 4 accounts.</b> 14 Q. I thought you said earlier to Mr Beer that some of the 15 firearms officers raised the concerns, they were the 16 first to raise it? 17 <b>A. Yes, they were.</b> 18 Q. Well, if they were discussing welfare, why was there 19 a need for your team, your firearms officers, to be 20 raising the post-incident procedure, which has nothing 21 to do with welfare? 22 <b>A. That was part of the meeting, welfare, and that came up 23 in the meeting about we have not provided our, you know, 24 statements yet.</b> 25 Q. You went off and had a separate discussion with V53,</p> <p style="text-align: center;">Page 119</p>
<p>1 wasn't it? I don't want to quibble with words, you had 2 all the firearms officers in attendance? 3 <b>A. Yes.</b> 4 Q. You were there. You had lawyers there? 5 <b>A. Yes.</b> 6 Q. You had Police Federation reps there? 7 <b>A. As far as I remember.</b> 8 Q. And you had the officer, V53, who had been involved in 9 the Mark Duggan shooting? 10 <b>A. Yes, with other representatives from the PFOA.</b> 11 Q. With other representatives. It sounds like a meeting? 12 <b>A. You can call it a meeting then, sir.</b> 13 Q. What would you describe it as then? 14 <b>A. It was just basically a welfare visit from the PFOA.</b> 15 Q. How long do you say that this welfare visit lasted? 16 <b>A. An hour or so, if that.</b> 17 Q. What was being discussed that would take an hour? 18 <b>A. The PFOA is like a charitable organisation that 19 organises welfare and support services for firearms 20 officers.</b> 21 Q. Q9, I am going to repeat my question. What was being 22 discussed, why it would take an hour? 23 <b>A. Basically all -- the options that are open to firearms 24 officers and the services that they could tap into if 25 they were members of the PFOA.</b></p> <p style="text-align: center;">Page 118</p>	<p>1 correct? 2 <b>A. Yes.</b> 3 Q. First question. How long was that separate discussion 4 with V53? 5 <b>A. I can't remember. It was 15, 20 minutes, if that.</b> 6 Q. 15, 20 minutes, all right. This is on top of the hour? 7 <b>A. No, this is all included.</b> 8 Q. What were you discussing with V53? 9 <b>A. Welfare issues.</b> 10 Q. Would do you mean "welfare issues", tell us? 11 <b>A. He was basically asking about my family and how they 12 felt and he was trying to give his experience about his 13 family and what they went through and what sort of -- 14 the roller coaster that they would be on and that 15 I would be on.</b> 16 Q. Because we know back in March 2012, V53 hadn't -- 17 decisions hadn't even been taken in relation to whether 18 or not he would be prosecuted, that was still extant. 19 <b>A. We were not talking about anything to do with either of 20 the operations.</b> 21 Q. We know that the inquest hadn't taken place, because 22 that didn't take place until the autumn of 2014. 23 <b>A. And we were not talking about either of the operations, 24 it was all purely welfare and about our families.</b> 25 Q. He took you to one side and he was genuinely concerned</p> <p style="text-align: center;">Page 120</p>

<p>1 about you, was he?</p> <p>2 <b>A. He was, yes.</b></p> <p>3 Q. All right. Tell us then, what other discussions have</p> <p>4 you had with V53 since?</p> <p>5 <b>A. About? About what?</b></p> <p>6 Q. Sorry the question is, what other discussions have you</p> <p>7 had with V53 since, that is the question.</p> <p>8 <b>A. On a level of friendship, the sort of thing you discuss</b></p> <p>9 <b>with your friends.</b></p> <p>10 Q. You consider him to be your friend?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. This was the first time you had met him was it?</p> <p>13 <b>A. No, you said "since".</b></p> <p>14 Q. On 8 March, this was the first time you had met him,</p> <p>15 correct?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Have you had discussions with the officer in</p> <p>18 Azelle Rodney?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. So you have -- so you have had discussions with the</p> <p>21 shooter in Azelle Rodney and the shooter in Mark Duggan?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Tell us, how many discussions have you had with the</p> <p>24 Azelle Rodney shooter?</p> <p>25 <b>A. That was from when I went to the Police Firearms</b></p> <p style="text-align: center;">Page 121</p>	<p>1 Q. Can you just explain this to me. Why would you put in</p> <p>2 a statement that you conferred then?</p> <p>3 <b>A. As in -- the statement that we made was a form of words</b></p> <p>4 <b>about conferring, put on the end of it.</b></p> <p>5 THE CHAIRMAN: The word actually was "clarified".</p> <p>6 MR THOMAS: Let me come on to some other issues then.</p> <p>7 The actual incident itself and the arrival of your</p> <p>8 car, the alpha car.</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. I just want to be clear on this. You say that there was</p> <p>11 a plan of sorts that had been discussed as you were</p> <p>12 driving up to the car park, correct?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. This is a plan that you say was communicated to all the</p> <p>15 other firearms officers; is that right?</p> <p>16 <b>A. As I remember, yes, via a tactical channel.</b></p> <p>17 Q. Do you have an explanation as to why the firearms</p> <p>18 officers in the bravo car and the charlie car were</p> <p>19 unaware of this plan?</p> <p>20 <b>A. No, unless -- that would be a question for X7 whether he</b></p> <p>21 <b>has communicating it properly, if he was actually using</b></p> <p>22 <b>the radio properly with the pressel, and that came</b></p> <p>23 <b>across to the other tactical channel vehicles.</b></p> <p>24 Q. The alternative would be that there was no plan?</p> <p>25 <b>A. Yes, that is your alternative.</b></p> <p style="text-align: center;">Page 123</p>
<p>1 <b>Officers' Association function.</b></p> <p>2 Q. My question was --</p> <p>3 <b>A. A social function, so on one occasion.</b></p> <p>4 Q. What did he have to say to you?</p> <p>5 <b>A. Basically genuinely concerned about my welfare.</b></p> <p>6 Q. It sounds like there is a little club of you firearms</p> <p>7 officers who shoot people, is that how --</p> <p>8 THE CHAIRMAN: Mr Thomas, this is very sensitive and</p> <p>9 delicate investigation that I have to carry out, and</p> <p>10 I will not have --</p> <p>11 MR THOMAS: I will move on.</p> <p>12 THE CHAIRMAN: -- inflammatory language like that used. You</p> <p>13 are here to ask questions to assist me in getting at the</p> <p>14 truth.</p> <p>15 MR THOMAS: Sir, I shall move on.</p> <p>16 Tell me this. In your witness statement, you</p> <p>17 indicated that you conferred with officers and I know</p> <p>18 today you said that well, that is a mistake you didn't</p> <p>19 mean to say confer because you didn't confer, you just</p> <p>20 looked at the flip chart.</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. You told Mr Beer, towards the end of his questioning of</p> <p>23 you, that at the end of this incident you were</p> <p>24 specifically told about the rules about not conferring?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 122</p>	<p>1 Q. All right. So your vehicle pulls up, and something that</p> <p>2 I just want your clarity on, we know that you have</p> <p>3 positioned yourself in the rear offside of your</p> <p>4 vehicle --</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. -- in the position that you described to Mr Beer this</p> <p>7 morning.</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. I just want to clarify this with you. You said that you</p> <p>10 had a good view into the red Audi --</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. -- and you could see Mr Grainger and Mr Totton.</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. You knew Mr Grainger was the driver, didn't you?</p> <p>15 <b>A. No.</b></p> <p>16 Q. Well, you had been listening to the radio channel,</p> <p>17 hadn't you --</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. -- from the surveillance officers, correct?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. There was no reason for you not to have been listening</p> <p>22 to that channel, was there?</p> <p>23 <b>A. No.</b></p> <p>24 Q. No.</p> <p>25 The surveillance officers had indicated that</p> <p style="text-align: center;">Page 124</p>

1 Anthony Grainger was the driver when they set off  
 2 initially?  
 3 **A. Okay, yes.**  
 4 Q. Yes.  
 5 Again, let me ask you, there is no reason for you  
 6 not to have heard that, is there?  
 7 **A. Well, we weren't in our vehicle so we wouldn't have had**  
 8 **access to the vehicle set.**  
 9 Q. At some point you would have wanted to know who the  
 10 driver was, if that information was available?  
 11 **A. Yes.**  
 12 Q. Yes. If that information was available, there is no  
 13 reason to believe that wouldn't have been passed on to  
 14 you, is there?  
 15 **A. We weren't in a position to listen to that transmission**  
 16 **while we are in Leigh police station. The drivers would**  
 17 **have had the vehicle sets on them, maybe a body set if**  
 18 **they were in the police station with us.**  
 19 Q. Once you would have set off, you would have asked,  
 20 wouldn't you?  
 21 **A. No, we didn't.**  
 22 Q. Because we know this, we know that DC Clark, at 18.29,  
 23 sees Anthony getting into the driver's seat. What time  
 24 did you set off?  
 25 **A. I believe it was about 6.15.**

Page 125

1 Q. 18.29?  
 2 **A. Okay.**  
 3 Q. We know that DC Evans identified Anthony as the driver  
 4 of the red Audi as it travelled to Culcheth. He was one  
 5 of your spotters, wasn't he, Mr Evans?  
 6 **A. Spotter? I don't understand what you mean.**  
 7 Q. He was one of the surveillance officers on the ground.  
 8 **A. A surveillance officer. Yes, he is, yes.**  
 9 Q. Those observations would have been broadcast.  
 10 **A. I don't remember hearing those observations, sir.**  
 11 Q. You see the short point is this. You would have  
 12 known -- I am suggesting there is no reason for you not  
 13 to have known -- that out of the three occupants, two of  
 14 them had been identified, correct?  
 15 **A. As far as I was aware all three occupants were**  
 16 **identified.**  
 17 Q. Mr Totton, Mr Grainger and an unidentified man in the  
 18 back.  
 19 **A. I wasn't aware of that; we thought Mr Rimmer was still**  
 20 **in the back.**  
 21 Q. It is your evidence, is it, you didn't know who the  
 22 driver was?  
 23 **A. Yes.**  
 24 Q. All right.  
 25 We are back at the position then when you have just

Page 126

1 pulled up, okay, your vehicle, and you are in the  
 2 position that you were in with your gun ready covering  
 3 the vehicle, okay?  
 4 **A. Yes.**  
 5 Q. You see two men in the front?  
 6 **A. Yes.**  
 7 Q. You said that it was some three to four seconds after  
 8 your vehicle had stopped that you fired the shot; is  
 9 that correct?  
 10 **A. Yes.**  
 11 Q. Had you realised that X7 had got out of your vehicle  
 12 before your vehicle had stopped?  
 13 **A. No.**  
 14 Q. Can I just ask you this. Were you aware that X7 was by  
 15 the driver's door of the red Audi?  
 16 **A. No.**  
 17 Q. Can you help us with this. From where you were  
 18 positioned, physically was there anything preventing  
 19 you, should you have wanted to look, to see that X7 was  
 20 by the driver's door?  
 21 **A. No.**  
 22 Q. So there was nothing physically that was blocking your  
 23 way to see X7 there, if you had looked, correct?  
 24 **A. Correct.**  
 25 Q. Okay.

Page 127

1 THE CHAIRMAN: And if he was there.  
 2 MR THOMAS: And if he was there.  
 3 We have yet to hear from X7, he is going to give his  
 4 evidence.  
 5 Let me ask you the same question in relation to X9.  
 6 Physically, if X9 was on the nearside -- this is the  
 7 passenger side of the vehicle, right, are you with me?  
 8 The side that Totton gets out of.  
 9 **A. Yes.**  
 10 Q. Right. Physically, was there anything that was stopping  
 11 you from seeing X9 near the vehicle?  
 12 **A. No.**  
 13 Q. Sorry, W9, I said -- W9.  
 14 **A. No.**  
 15 Q. No.  
 16 Okay.  
 17 Let me ask you about your hearing. Do you just have  
 18 ordinary hearing, there is nothing wrong with your  
 19 hearing?  
 20 **A. No.**  
 21 Q. Your hearing is fine, correct?  
 22 **A. Yes.**  
 23 Q. Did you hear, would you recognise X7's voice?  
 24 **A. Probably.**  
 25 Q. Well, I ask you that because, is X7 somebody who you

Page 128



<p>1 have dealt with on many times --</p> <p>2 <b>A. Yes, I know him, yes.</b></p> <p>3 Q. You know his voice?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Right. Before you fired your weapon, did you hear X7</p> <p>6 call out this command:</p> <p>7 "Armed police, show me your hands."</p> <p>8 <b>A. No.</b></p> <p>9 Q. You see I am going to put this to you, because I think</p> <p>10 in fairness it ought to be put to you. The suggestion</p> <p>11 is that X7 is standing covering Mr Grainger by the</p> <p>12 driver's door, and he calls out that command.</p> <p>13 If that command was called out, and shouted out, is</p> <p>14 there any particular reason why you wouldn't have heard</p> <p>15 it?</p> <p>16 <b>A. No.</b></p> <p>17 Q. Just to finish the narrative, X7 says when he shouted</p> <p>18 that to Anthony, as instructed the driver, Anthony,</p> <p>19 raised both of his hands in front of him, and looked</p> <p>20 directly at him.</p> <p>21 Let me just break that down.</p> <p>22 When you were looking at Anthony, before you shot</p> <p>23 him, did you see Anthony turn his head and look towards</p> <p>24 the driver's door?</p> <p>25 <b>A. No.</b></p> <p style="text-align: center;">Page 129</p>	<p>1 Q. You see, again, I want to put this to you, when X7 says</p> <p>2 he instructed Anthony to put his hands up, moments</p> <p>3 later, and we are talking -- we are not talking up to 10</p> <p>4 seconds, the canister goes in. Do you understand?</p> <p>5 <b>A. I know what you are saying, yes.</b></p> <p>6 Q. And that causes Anthony to flinch.</p> <p>7 Let me ask you this. Did you see, when Anthony's</p> <p>8 hands were up, Anthony flinching when the glass was</p> <p>9 shattered?</p> <p>10 <b>A. No, Anthony's hands weren't up when the glass was</b></p> <p>11 <b>shattered.</b></p> <p>12 Q. Tell me this. On your version of events, when you are</p> <p>13 looking at Anthony and you have your gun in the aim,</p> <p>14 yes?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. You said that Anthony's hands go up, yes, like this,</p> <p>17 something like this? (Indicates)</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Okay.</p> <p>20 Is Anthony looking at you?</p> <p>21 <b>A. I wasn't looking at his face.</b></p> <p>22 Q. What were you looking at?</p> <p>23 <b>A. His hands.</b></p> <p>24 Q. All right. What position was his body in?</p> <p>25 <b>A. He was sat as he would do normally in a car.</b></p> <p style="text-align: center;">Page 131</p>
<p>1 Q. Did you see Anthony's hands?</p> <p>2 <b>A. His hands were raised when we ...</b></p> <p>3 Q. Did you see his hands?</p> <p>4 <b>A. Yes, when they were raised.</b></p> <p>5 Q. What did he have on his hands?</p> <p>6 <b>A. Gloves.</b></p> <p>7 Q. Just help me with this. There is two points of time,</p> <p>8 okay, the first point is when Anthony's hands go up,</p> <p>9 okay?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. Right, which you say you see?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. The second point of time, which I want you to help the</p> <p>14 chairman with, is when the CS canister goes into the</p> <p>15 vehicle, okay, so you have the two points of time?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. What do you say the distance is between those two points</p> <p>18 of time?</p> <p>19 <b>A. When his hands went up to the CS going in?</b></p> <p>20 Q. Yes.</p> <p>21 <b>A. I would estimate no more than 10 seconds, probably</b></p> <p>22 <b>slightly less than that.</b></p> <p>23 Q. You have quite a distance between those two points of</p> <p>24 time, up to about 10 seconds.</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 130</p>	<p>1 Q. Straight on?</p> <p>2 <b>A. It appeared to be, yes.</b></p> <p>3 Q. Yes. So, okay, you were not looking at his face but you</p> <p>4 could see his body and you were looking at his body,</p> <p>5 yes?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. And he is sat in the driver's seat, face on to the</p> <p>8 windscreen, correct?</p> <p>9 <b>A. It appeared to be, yes.</b></p> <p>10 Q. Well, I am asking you because you were there.</p> <p>11 <b>A. Yes, and I am saying it appeared to be face on to the</b></p> <p>12 <b>windscreen.</b></p> <p>13 Q. All right. Then you say his right hand suddenly drops</p> <p>14 down?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Followed by his left hand?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Then you shoot him?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. If I have understood your evidence correctly, his body</p> <p>21 is still essentially in the same position apart from his</p> <p>22 hands dropping. Correct?</p> <p>23 <b>A. It appeared to be, yes.</b></p> <p>24 Q. On your version of events, Anthony is not turning to his</p> <p>25 right -- in other words, so we are clear, he is not</p> <p style="text-align: center;">Page 132</p>

<p>1 turning towards the driver's door?</p> <p>2 <b>A. I didn't see him turning towards the driver's door.</b></p> <p>3 Q. His body is not turning towards the driver's door?</p> <p>4 <b>A. I didn't see him turning towards the driver's door.</b></p> <p>5 Q. Can I ask you to take a file, please, it is file Q,</p> <p>6 please. Bundle Q, page 74.</p> <p>7 <b>A. Thank you.</b></p> <p>8 Q. It is a supplementary report from the ballistics expert,</p> <p>9 Dr Seaman.</p> <p>10 Just before we come to that, Q9, just before we come</p> <p>11 to that, just one other question I need to put to you.</p> <p>12 When you discharged your weapon, I think you</p> <p>13 indicated earlier on that at most the -- I think the</p> <p>14 nozzle of your weapon was three, maybe four inches</p> <p>15 outside --</p> <p>16 <b>A. As I remember, yes, the muzzle.</b></p> <p>17 Q. The muzzle, yes. So you wouldn't have been out -- your</p> <p>18 head would not have been out of window on your vehicle.</p> <p>19 Is that right?</p> <p>20 <b>A. Not as I remember, no.</b></p> <p>21 Q. You are within your vehicle?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Let's have a look at this report, and I want to see what</p> <p>24 it says.</p> <p>25 Sir, it is page 74 and I will just read it out.</p> <p style="text-align: center;">Page 133</p>	<p>1 possibly leaning slightly forward when the shot was</p> <p>2 fired."</p> <p>3 Do you remember I said to you and I put to you just</p> <p>4 a moment ago, the suggestion that may be made by X7 that</p> <p>5 the glass shattered, Mr Grainger was turning to his</p> <p>6 right and flinched. Do you remember me putting to that</p> <p>7 you?</p> <p>8 <b>A. I do, yes.</b></p> <p>9 Q. That is not consistent with your evidence, is it,</p> <p>10 because you have him --</p> <p>11 <b>A. No.</b></p> <p>12 Q. -- just his arms moving --</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. -- and him just sitting in the same position straight on</p> <p>15 to the windscreen.</p> <p>16 <b>A. That is how he appeared to me, yes.</b></p> <p>17 Q. May I suggest the reason why this evidence appears to be</p> <p>18 at odds with your evidence, is because that is not</p> <p>19 Mr Grainger's positioning. He was moving to the right,</p> <p>20 where X7 was --</p> <p>21 <b>A. I didn't see that movement.</b></p> <p>22 Q. -- when you shot him?</p> <p>23 <b>A. I didn't see that movement.</b></p> <p>24 Q. In other words, X7 was there and he had the man covered.</p> <p>25 You accept this. If X7 was there covering Mr Grainger,</p> <p style="text-align: center;">Page 135</p>
<p>1 "Further conclusions", are you there?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. "This work at the scene is consistent with the results</p> <p>4 report in the first statement. Careful positioning of</p> <p>5 the two vehicles ..."</p> <p>6 Just to pause there, what he has done he has</p> <p>7 recreated the scene and put the red Audi and your</p> <p>8 vehicle in very similar positions, okay?</p> <p>9 <b>A. Okay, yes.</b></p> <p>10 Q. Right:</p> <p>11 "Careful positioning of the two vehicles at the</p> <p>12 scene and trajectory testing with the actual MP5 firearm</p> <p>13 have been used to investigate where the bullet would</p> <p>14 have struck Mr Grainger based on different postures for</p> <p>15 him and for the firer. Given the autopsy findings</p> <p>16 reported in conjunction with these tests, the scientific</p> <p>17 evidence provides for ..."</p> <p>18 And these are the conclusions.</p> <p>19 Number 1:</p> <p>20 "The firer's head being just outside the window</p> <p>21 rather than inside, assuming he used the scope to aim."</p> <p>22 Did you use the scope to aim?</p> <p>23 <b>A. No.</b></p> <p>24 Q. 2:</p> <p>25 "Mr Grainger being turned partly to his right,</p> <p style="text-align: center;">Page 134</p>	<p>1 he would have had a better position to see what was in</p> <p>2 Mr Grainger's hands. Do you accept that?</p> <p>3 <b>A. I didn't see X7.</b></p> <p>4 Q. Do you accept that if X7 was there he would have had</p> <p>5 a better view of what was in Mr Grainger's hands? That</p> <p>6 is the question.</p> <p>7 <b>A. Quite possibly, yes --</b></p> <p>8 Q. Yes.</p> <p>9 <b>A. -- if he was there.</b></p> <p>10 Q. Because that would have been his job. That is why he</p> <p>11 would have gone to that door.</p> <p>12 <b>A. If X7 was there then my job would have been redundant</b></p> <p>13 <b>then.</b></p> <p>14 Q. Yes.</p> <p>15 Let me move on. New topic, please.</p> <p>16 Your evidence is this, isn't it, Anthony Grainger's</p> <p>17 hands went down the once and never went back up again?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. So that we are absolutely crystal clear on this, it is</p> <p>20 not your evidence that after Anthony was shot, he moved</p> <p>21 his hands back up again. That is not your evidence, is</p> <p>22 it?</p> <p>23 <b>A. He didn't -- he didn't move his hands back into my field</b></p> <p>24 <b>of view.</b></p> <p>25 Q. Let's be clear on this, you are saying after Anthony was</p> <p style="text-align: center;">Page 136</p>

<p>1 shot, you don't see him move again, do you?</p> <p>2 <b>A. No, I didn't.</b></p> <p>3 Q. The reason why I ask you that is, so far I have</p> <p>4 mentioned X7, let's come to X9.</p> <p>5 THE CHAIRMAN: Do you mean W9?</p> <p>6 MR THOMAS: Sorry, W9. Forgive me sir, W9.</p> <p>7 He puts the canister in and gave evidence that he</p> <p>8 sees Anthony's hands come up as if he was capitulating?</p> <p>9 <b>A. W9 didn't put the canister in, X9 put the canister in.</b></p> <p>10 Q. X9.</p> <p>11 Sir, to avoid any suggestion. It was X9, it is X9</p> <p>12 that I am talking about.</p> <p>13 THE CHAIRMAN: Right, you did mean X9?</p> <p>14 MR THOMAS: I did mean X9.</p> <p>15 So, X9, he is the one who puts the canister in,</p> <p>16 I had that right, okay. He says that he is alongside</p> <p>17 and he sees Mr Grainger's hands come up as if he was</p> <p>18 capitulating, yes?</p> <p>19 <b>A. That is from his perspective.</b></p> <p>20 Q. Well, he is right by the window, because he is about to</p> <p>21 break the window. How is it you didn't see him?</p> <p>22 <b>A. His hands didn't come up again, from my perspective.</b></p> <p>23 Q. Forgive me, how is it that you didn't see X9 who is</p> <p>24 right by the window breaking the window?</p> <p>25 <b>A. Because I was focused on Anthony Grainger.</b></p> <p style="text-align: center;">Page 137</p>	<p>1 Q. Well, did you see him move?</p> <p>2 <b>A. No.</b></p> <p>3 Q. So you shot, you neutralised the threat. The threat now</p> <p>4 is from Totton, isn't it?</p> <p>5 <b>A. No. The threat is from Anthony Grainger, he had made</b></p> <p>6 <b>the sudden movement down to his lap. I shot him and</b></p> <p>7 <b>made sure that the threat was neutralised by keeping</b></p> <p>8 <b>cover on to him.</b></p> <p>9 Q. Forgive me, you said that the command you had given was</p> <p>10 for the men to show you their hands?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Totton, you have told us, makes a sudden movement. You</p> <p>13 see that, you must have seen that.</p> <p>14 <b>A. I didn't see that.</b></p> <p>15 Q. Forgive me, you are there looking at -- Totton's closest</p> <p>16 to you, you have got Grainger, who you have just shot,</p> <p>17 you know what I mean by peripheral vision, you can see</p> <p>18 movement, yes?</p> <p>19 <b>A. My focus was on Anthony Grainger, not on Totton.</b></p> <p>20 Q. Are you saying you don't see Totton move when he is the</p> <p>21 closest to you?</p> <p>22 <b>A. No, I didn't.</b></p> <p>23 Q. You say that you see him before he gets out of the</p> <p>24 vehicle?</p> <p>25 <b>A. He was disappearing out of the vehicle, so I saw the</b></p> <p style="text-align: center;">Page 139</p>
<p>1 Q. All right.</p> <p>2 Let's come on to Mr Totton, who is sitting right</p> <p>3 next to Mr Grainger. In fact Mr Totton would have been</p> <p>4 closer to you, correct?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. You told us that you were really concerned, you</p> <p>7 perceived the threat from Anthony because his hands went</p> <p>8 down.</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. So that is why you discharged your weapon?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. You wanted to neutralise the threat?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Well, there was a potential threat from two of these men</p> <p>15 in the front. You have told us that you thought there</p> <p>16 were weapons in the car?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Well, when you shot Anthony, did you think that your</p> <p>19 bullet had missed him?</p> <p>20 <b>A. No.</b></p> <p>21 Q. Why did you tell Mr Beer that, having shot Anthony, you</p> <p>22 still believed him to be a threat, which is why you took</p> <p>23 your eyes off Mr Totton?</p> <p>24 <b>A. Because I was just making sure that the round was</b></p> <p>25 <b>effective.</b></p> <p style="text-align: center;">Page 138</p>	<p>1 <b>back of him.</b></p> <p>2 Q. So he is a threat. Did you point your gun at him?</p> <p>3 <b>A. No.</b></p> <p>4 Q. Why not? You couldn't see his hands?</p> <p>5 <b>A. That would have been dealt with by some of the team</b></p> <p>6 <b>encroaching.</b></p> <p>7 Q. How do you know that, you were there covering?</p> <p>8 <b>A. Yes, but he was going out of my arc of fire.</b></p> <p>9 Q. You said that I believe that he may have had a gun?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. You are very close to him.</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Q9, may I suggest that this doesn't make sense, that the</p> <p>14 man closest to you, who has not only disregarded your</p> <p>15 instructions, but has got out of the vehicle without</p> <p>16 a police officer being there instructing him to get out,</p> <p>17 and you are not covering him?</p> <p>18 <b>A. No, I was covering Anthony.</b></p> <p>19 Q. The man who you had shot and there was no movement from?</p> <p>20 <b>A. Who posed the threat, because of his movement.</b></p> <p>21 Q. Sorry, forgive me, after you had shot him, what threat</p> <p>22 did you perceive?</p> <p>23 <b>A. I didn't know whether the round had been effective.</b></p> <p>24 Q. Sorry, I thought I had asked you: after you had shot him</p> <p>25 did you see any movement from him?</p> <p style="text-align: center;">Page 140</p>

1 **A. No.**  
 2 Q. What led you to believe that your shot hadn't been  
 3 effective?  
 4 **A. Because I had to keep, basically keep cover on him.**  
 5 Q. You are trained in relation to when and how to discharge  
 6 your firearm, correct?  
 7 **A. Yes.**  
 8 Q. You know that one of your responsibilities is safety to  
 9 the public, correct?  
 10 **A. Yes.**  
 11 Q. Safety to your colleagues?  
 12 **A. Yes.**  
 13 Q. Also safety and respecting the right of life to suspects  
 14 as well, correct?  
 15 **A. Yes.**  
 16 Q. Part of your training would have been in relation to  
 17 making quick decisions.  
 18 **A. Yes.**  
 19 Q. You had a situation here, and we can agree on the  
 20 following. Before you shot Anthony Grainger, you saw no  
 21 gun. Correct?  
 22 **A. Yes.**  
 23 Q. You shot Anthony Grainger simply because he moved his  
 24 hands?  
 25 **A. On the back of the intelligence we had about him and the**

Page 141

1 **people he was associated with in the car.**  
 2 Q. For all you know, he could have been reaching for a door  
 3 handle?  
 4 **A. He was not reaching for a door handle, his hand went**  
 5 **down to his lap.**  
 6 Q. The one thing that we can agree on, there was no gun in  
 7 his lap?  
 8 **A. No.**  
 9 Q. There was no gun in the car?  
 10 **A. No.**  
 11 Q. You shot an unarmed man?  
 12 **A. Unfortunately, yes.**  
 13 Q. Did you panic?  
 14 **A. No.**  
 15 Q. Let me put this to you. Your vehicle came into contact  
 16 with the red Audi when you came in to do the hard stop,  
 17 when you blocked the Audi in.  
 18 **A. Not that I am aware of.**  
 19 Q. No?  
 20 **A. No.**  
 21 Q. All right. Was it the suddenness of how your vehicle  
 22 stopped that caused you to discharge your weapon?  
 23 **A. No.**  
 24 Q. If the canister had gone into the vehicle, we know that  
 25 the canister fogs the vehicle.

Page 142

1 **A. Yes.**  
 2 Q. We also know that the canister causes -- the CS canister  
 3 causes involuntary movements of subjects who are  
 4 affected by the CS spray, correct?  
 5 **A. It can do, yes.**  
 6 Q. Yes.  
 7 Let me ask you this. It has been suggested that  
 8 there was a flinch, I am going to suggest to you  
 9 an alternative to what you have -- an alternative  
 10 version to the one that you have given us, that either  
 11 the flinching was caused by the breaking glass or the  
 12 dispersal of the CS canister. Was that why you shot  
 13 him?  
 14 **A. No.**  
 15 Q. You shot him because he made an involuntary movement  
 16 because the canister went in?  
 17 **A. No.**  
 18 Q. Do you think you have the right temperament for this  
 19 job?  
 20 **A. Yes.**  
 21 Q. At times you are not a bit hot headed?  
 22 **A. No.**  
 23 MR THOMAS: Sorry, sir, just bear with me a second. (Pause)  
 24 Do you accept that as a firearms officer, you must  
 25 make a careful assessment of your surrounding

Page 143

1 circumstances?  
 2 **A. Yes.**  
 3 Q. And in particular a proper evaluation of the threat --  
 4 **A. Yes.**  
 5 Q. -- posed?  
 6 **A. Yes.**  
 7 MR THOMAS: Sir, that is all I ask.  
 8 THE CHAIRMAN: Thank you, Mr Thomas.  
 9 Mr Weatherby, do you have questions?  
 10 MR WEATHERBY: Yes, please.  
 11 Questions from MR WEATHERBY  
 12 MR WEATHERBY: Good afternoon, officer. My name is  
 13 Pete Weatherby and I am asking you questions on behalf  
 14 of Mr Grainger's partner.  
 15 **A. Afternoon.**  
 16 Q. Can I just clarify this to start with, that at the time  
 17 that you shot Anthony Grainger, on your position, you  
 18 perceived a threat to other officers?  
 19 **A. Yes.**  
 20 Q. Just to make this clear, the reason that you say that  
 21 you shot him was a risk not to yourself but to other  
 22 officers?  
 23 **A. Yes.**  
 24 Q. You also say -- I think you said to Mr Beer this  
 25 morning -- that at the time that you shot

Page 144

<p>1 Anthony Grainger neither X7 nor W9 had come round from 2 the nearside of the alpha car? 3 <b>A. I don't know where they were.</b> 4 Q. Yes. It follows from that you couldn't see them? 5 <b>A. Yes.</b> 6 Q. You have described the role that you took on as cover -- 7 <b>A. Yes.</b> 8 Q. -- is that right? 9 <b>A. Yes.</b> 10 Q. What you have then gone on to describe is that, as the 11 operation deployed, the car comes across the stolen car, 12 you were positioned directly, more or less, in front of 13 the subject car? 14 <b>A. Yes.</b> 15 Q. And you were pointing your gun through the open window, 16 slightly protruding from the open window, yes? 17 <b>A. Yes, when we had stopped.</b> 18 Q. You had activated a powerful torch on the gun? 19 <b>A. Yes.</b> 20 Q. Help me with this, "cover" is a term that you use, as 21 firearms officers, for a role which supports other 22 officers who are doing something active? 23 <b>A. Yes.</b> 24 Q. Yes? 25 What in fact you did, as soon as the deployment</p> <p style="text-align: center;">Page 145</p>	<p>1 <b>A. Yes.</b> 2 Q. When you challenged the subjects, you were not in fact 3 covering anybody, were you? 4 <b>A. I was covering both of the subjects.</b> 5 Q. By the time any of the other officers had emerged, on 6 your account, you had fatally shot Anthony Grainger and 7 another subject, Mr Totton, was out of the car, or in 8 the process of getting out of the car? 9 <b>A. Yes.</b> 10 Q. Yes? 11 The GMP policy on vehicle strikes, help me with 12 that, the policy is based -- I am probably not going to 13 use the right terminology, so feel free to correct me. 14 The vehicle strike policy is based on surprise, yes? 15 <b>A. Yes.</b> 16 Q. A covert approach? 17 <b>A. Yes.</b> 18 Q. It is based on a shock and awe approach? 19 <b>A. Yes.</b> 20 Q. That is followed by containment, yes? 21 <b>A. That is one part -- one strand of the tactic, where you 22 could contain it.</b> 23 Q. Yes. Yes. I am sure during the course of our questions 24 and answers the word "flexibility" is going to come in. 25 <b>A. Okay.</b></p> <p style="text-align: center;">Page 147</p>
<p>1 started, is that you challenged the subjects? 2 <b>A. Yes.</b> 3 Q. Yes? 4 There is a difference, isn't there, between 5 a challenge and cover? 6 <b>A. You can still challenge from cover.</b> 7 Q. Yes. But what you did, from the position that you were, 8 on your account, is that you challenged them verbally? 9 <b>A. Yes.</b> 10 Q. Yes? 11 You obviously challenged them with the firearm? 12 <b>A. Covered them with the firearm.</b> 13 Q. Yes. 14 That all happened before any other officer had 15 deployed? 16 <b>A. Deployed from --</b> 17 Q. On to the car? 18 <b>A. On to the car, yes.</b> 19 Q. Yes? I should have made myself clear, other officers 20 were in the process of deploying but none of them were 21 in the vicinity of the car? 22 <b>A. I don't know where they were, sir.</b> 23 Q. Yes, you couldn't see them, you were looking out at the 24 car, X7 not visible, W9 not visible, bravo officers not 25 visible, charlie officers not visible, yes?</p> <p style="text-align: center;">Page 146</p>	<p>1 Q. Can I make it clear to you, I am not going to suggest 2 that the policy is a policy of concrete and stone? 3 <b>A. Okay.</b> 4 Q. I am not going to suggest to you that there is not 5 a degree of flexibility but at the moment I am just 6 trying to explore with you the background and the policy 7 of a vehicle strike, yes? 8 <b>A. Yes.</b> 9 Q. So covert approach, surprise on the subjects, shock and 10 awe and then that is followed by containment of the 11 subjects in the vehicle and then extraction? 12 <b>A. That is one of the tactics or it is immediately extract.</b> 13 Q. Yes, and of course with flexibility, sometimes that 14 doesn't quite happen and there are variations. Yes? 15 <b>A. Yes.</b> 16 Q. It is based upon officers deploying out of the cars 17 leaving only the driver in the MASTS vehicles? 18 <b>A. Most of the time, yes.</b> 19 Q. Yes. 20 And the officers then doing what we have just agreed 21 in close quarter to the car, yes? 22 <b>A. Yes.</b> 23 Q. Of course what you were doing on that day was 24 an immediate detain and extract rather than a contain 25 and negotiate?</p> <p style="text-align: center;">Page 148</p>

1 **A. Yes.**  
 2 Q. Yes, so I am concentrating on that part of it.  
 3 I took one of your colleagues through some training  
 4 material. I am going to take you to that but in short  
 5 order, because the rest of us had seen it. I just want  
 6 to give you the opportunity of seeing the bit that  
 7 relates to you.  
 8 Could I ask you to look at bundle G1, at page 38.  
 9 (Pause)  
 10 Do you have that?  
 11 **A. Yes.**  
 12 Q. Right. Just for context for you, this is a page, and  
 13 I am going to show you some other pages, from  
 14 a PowerPoint presentation from the training pack that  
 15 was used in the period before the deployment that we are  
 16 considering, okay. So it was used from 2010.  
 17 **A. This training pack is obsolete.**  
 18 Q. Well I have no doubt that things have moved on since  
 19 Anthony Grainger's shooting.  
 20 **A. No, this training scenario which you are showing me the**  
 21 **slide of here, became obsolete in about May 2010.**  
 22 Q. Right. Well, we have an amount of training material  
 23 which I understood was agreed to be training material  
 24 that had been used from 2010 to 2012, and this forms  
 25 a part of it. Is that wrong?

Page 149

1 **A. Yes, it is wrong.**  
 2 Q. Right.  
 3 **A. Mid-2010 we started driving our own vehicles rather than**  
 4 **having surveillance officers, so the deployment was four**  
 5 **officers in the vehicle.**  
 6 Q. Right. I understand that another officer has told us  
 7 that DSU officers originally with the driver and then  
 8 they became AFOs, yes?  
 9 **A. Yes, but this scenario became obsolete.**  
 10 Q. Right, so that is not a scenario that was current in  
 11 training up until 2012?  
 12 **A. No.**  
 13 Q. Would you just give me a moment, sir, please. (Pause)  
 14 My understanding from the previous evidence --  
 15 I will be corrected if I am wrong -- is that the only  
 16 change in this period to the training from this package  
 17 was the substitution of AFOs as drivers. Is that not  
 18 correct as far as you are concerned?  
 19 **A. That is not correct, no.**  
 20 Q. Well, let's just persevere with this and we will have to  
 21 look into that at a later stage, but maybe you can tell  
 22 us how things have changed during this period. I am not  
 23 talking about after the shooting, I am talking about  
 24 this period. On pages 38 and 39 we have conventional  
 25 deployments of the vehicle strike tactical options, yes?

Page 150

1 **A. And these -- as I said before, these two slides are**  
 2 **obsolete, that tactic was obsolete. There was no**  
 3 **specific role given to persons within the vehicles as**  
 4 **are depicted on these slides.**  
 5 Q. Right, so those are completely obsolete?  
 6 **A. Completely obsolete.**  
 7 Q. What do you then say, before the shooting what was this  
 8 replaced with, as far as you can recall?  
 9 **A. A three-vehicle tactic which four AFOs would be deployed**  
 10 **in each vehicle, in the bravo and charlie vehicle you**  
 11 **would have someone with a canister and a shotgun with**  
 12 **special munitions if it was authorised. Each of the**  
 13 **vehicles would be driven by a level 1 surveillance**  
 14 **trained firearms officer and then basically it would be**  
 15 **a fluid deployment on to the subject vehicle.**  
 16 Q. Right. So if we were to take -- stay with page 38 at  
 17 the moment, you are saying that there would be a third  
 18 vehicle?  
 19 **A. Yes.**  
 20 Q. Of course if we look through this pack, it does deal  
 21 with the fact that you can have three or four vehicles.  
 22 **A. Yes.**  
 23 Q. Apart from that, you are saying that the deployment of  
 24 the individuals, the A1, A2, A3, B1, B2, B3, et cetera,  
 25 that had changed?

Page 151

1 **A. Yes, this is making it role specific, which it was not**  
 2 **role specific because this created confusion.**  
 3 Q. Right. So on a conventional strike --  
 4 **A. Yes.**  
 5 Q. -- by March 2012, what was the training that you  
 6 received, what were you supposed to do?  
 7 **A. Basically, just it depended on the picture paint from**  
 8 **surveillance, where the subject vehicle came to**  
 9 **a natural stop, either it would be a hazard on the road**  
 10 **such as traffic lights, roundabouts and dependent on the**  
 11 **street furniture around it and other vehicles parked**  
 12 **around it. That is when you would basically put**  
 13 **an intervention if it was suitable, so it was extremely**  
 14 **flexible.**  
 15 Q. I knew we were going to get to the flexible word. I am  
 16 not going to dispute flexibility but what I am  
 17 struggling with at the moment is what you -- say you had  
 18 come on to the team, in December 2011 for example, and  
 19 you had gone on a MASTS training. Are you saying that  
 20 you would not have been trained along these lines?  
 21 **A. No.**  
 22 Q. You would have been trained that being a MASTS officer,  
 23 you would be involved in doing hard stops or vehicle  
 24 strikes, whatever we call them, yes?  
 25 **A. Yes, you would be.**

Page 152

1 Q. What would you be trained to do?  
 2 **A. It is basically to use -- adapt to the situation that**  
 3 **unfolds in front of you.**  
 4 Q. Right. You would simply go on a training course to be  
 5 told that on a vehicle strike you would just find work,  
 6 or whatever the terminology is?  
 7 **A. You do find work, but they would set up the course**  
 8 **content, sort of like displayed different, like**  
 9 **nearside, offside strike, perhaps --**  
 10 Q. Right.  
 11 **A. -- that sort of thing.**  
 12 Q. You would still have a conventional and  
 13 an unconventional set up?  
 14 **A. You still have conventional strikes on the road and then**  
 15 **unconventional if it was like say a car park.**  
 16 Q. You would still be trained that there are conventional  
 17 stops and that would have to be either nearside or  
 18 offside?  
 19 **A. That's a conventional stop, yes.**  
 20 Q. You would still have vehicles before and aft the subject  
 21 car?  
 22 **A. Most of the time, yes, it may well be that you would**  
 23 **have public vehicles in between as well.**  
 24 Q. Of course, we are back to flexibility, but on a training  
 25 course where you are just showing somebody the position

Page 153

1 of how to do it in an empty road for example --  
 2 **A. Yes.**  
 3 Q. -- that is what you would be doing?  
 4 **A. Yes.**  
 5 Q. Yes? In terms of what you would do in your role, A1  
 6 would still be the commander?  
 7 **A. He would still be the OFC, yes.**  
 8 Q. The driver would still be the driver?  
 9 **A. Yes.**  
 10 Q. But what you are saying is that A2 and A3 and B1, B2 and  
 11 B3 would not have any role?  
 12 **A. They would have a role, but that would be determined,**  
 13 **you know, on the nature of where the vehicle stopped and**  
 14 **what had to be, you know, the street furniture, it could**  
 15 **be a whole catalogue of things.**  
 16 Q. The plan would be bespoke in any operation?  
 17 **A. It wouldn't be bespoke, no.**  
 18 Q. No. I am sure it is just me but I am sorry I am not  
 19 following this. That if this has been superseded --  
 20 **A. Yes, there was a conversion course for all MASTS**  
 21 **officers in I think it was May/June 2010 and that**  
 22 **followed 12 firearms officers doing a sort of level one**  
 23 **surveillance course down in Ryton. And one said come**  
 24 **back to the force, a conversion course where the**  
 25 **firearms officers were then driving their own vehicles.**

Page 154

1 **It was all part of the CT uplift, because you couldn't**  
 2 **take --**  
 3 Q. So this is counter terrorism?  
 4 **A. No, that was all part of the CT uplift because we**  
 5 **couldn't expect counter terrorist surveillance drivers,**  
 6 **if we ended up working a job with them, to drive our**  
 7 **vehicles, we had to basically drive ourselves.**  
 8 Q. I understand that there is a change where TFU officers  
 9 are now driver, whereas before it wasn't. I get that.  
 10 **A. Yes.**  
 11 Q. But in terms of the change to this training process,  
 12 this default position, starting position.  
 13 **A. Yes, that was -- that was defunct middle of --**  
 14 Q. And defunct within Greater Manchester Police, you are  
 15 not talking about the Met or anywhere else?  
 16 **A. The Met do MASTS, but in a different format.**  
 17 Q. Can I make it clear. I am actually trying to work out  
 18 the Greater Manchester Police operation, not the Met.  
 19 **A. Yes.**  
 20 Q. Yes?  
 21 **A. Yes.**  
 22 Q. The position in terms of how the cars would operate,  
 23 would be similar to these diagrams?  
 24 **A. Yes.**  
 25 Q. The position in terms of how the officers would deploy

Page 155

1 would not?  
 2 **A. No.**  
 3 Q. If you got into bravo car on a particular operation and  
 4 you were B2, for example.  
 5 **A. Yes.**  
 6 Q. How would you know what to do?  
 7 **A. Because you would go and look for work. If you are in**  
 8 **that position, you would more than likely be the**  
 9 **shotgunner.**  
 10 Q. Right, okay. There are sometimes special munitions  
 11 authorisations, let's put that on one side for the  
 12 moment, okay.  
 13 **A. Yes.**  
 14 Q. Apart from specific roles like that, driver, commander,  
 15 special munitions, apart from that you are saying that  
 16 the Greater Manchester Police policy at the time of  
 17 Anthony Grainger's shooting was simply "find work"?  
 18 **A. It was along those lines. When we trained we made sure**  
 19 **that all the conventional basic stops were covered and**  
 20 **then we would try and develop scenarios that tested the**  
 21 **firearms officers on the MASTS course to actually assess**  
 22 **the situation and see where work needed to be done.**  
 23 Q. Yes. So as you did a stop, it could be that you would  
 24 be lopsided, that most of the officers went to one side  
 25 of the car, looking for work?

Page 156

1 **A. Potentially.**  
 2 Q. Yes.  
 3 **A. But that is an assessment you make when you are getting**  
 4 **out of the vehicle.**  
 5 Q. I get that if there is a starting point, a default  
 6 position like there is on these diagrams and this  
 7 policy, and you can be flexible from that when there is  
 8 a change of tactics but you are saying that it was  
 9 essentially a "free for all"?  
 10 **A. No, that is the wrong word, sir.**  
 11 Q. That is the wrong word. Help us then, you are saying  
 12 that there simply were no roles for those who didn't  
 13 have specific roles like driver or commander?  
 14 **A. That would be all determined by the OFC, if he was**  
 15 **rolling up to a vehicle, he would turn around and say,**  
 16 **"Bravo car, you take the nearside of the vehicle, alpha**  
 17 **car will take the offside of the vehicle".**  
 18 Q. Yes, as on one view of the evidence, happened in this  
 19 particular case?  
 20 **A. Yes.**  
 21 Q. That is an unconventional strike, isn't it, that  
 22 happened in this case?  
 23 **A. That would be a conventional strike, on a roadway.**  
 24 Q. Yes.  
 25 I mean on this, on a nearside strike, I am looking

Page 157

1 at page 41, I mean you would have had a specific role on  
 2 a conventional strike where you would have got out of  
 3 the nearside door, you would have provided cover for two  
 4 officers that had been dealing with special munitions  
 5 and then it would have been your role to shout "Open",  
 6 yes?  
 7 **A. Yes.**  
 8 Q. You are saying that simply after May 2010 that was all  
 9 gone --  
 10 **A. Yes.**  
 11 Q. -- and it was just a matter of finding work?  
 12 **A. Yes.**  
 13 Q. Who would have shouted "Open"?  
 14 **A. If it was immediately detain, then you wouldn't contain**  
 15 **them within the vehicle.**  
 16 Q. Basically officers would alight their cars, run at the  
 17 subject car and smash windows, pull people out of the  
 18 car?  
 19 **A. Pretty much, yes.**  
 20 Q. But without knowing which door to go to?  
 21 **A. Well, as they were approaching they would assess which**  
 22 **door needed to be covered and then that is the door they**  
 23 **would go to.**  
 24 Q. I may return to this, but I am not going to take any  
 25 more time at the moment on this part of it.

Page 158

1 Save, actually before we leave that document, there  
 2 is one point about -- can I just ask you to look at 48  
 3 and 49. On non-conventional stops, if you look at  
 4 bullet point 4:  
 5 "AFOs should alight via their own door and approach  
 6 the subject vehicle on that side to the first door they  
 7 come to and keep the door closed."  
 8 Was that gone as well?  
 9 **A. If it is in the same package yes.**  
 10 Q. All gone. And likewise the next page, "General  
 11 conditions":  
 12 "All doors of the subject vehicle will be held  
 13 closed by the team and all occupants of the vehicle will  
 14 be removed simultaneously upon the shout of 'Open!'"  
 15 **A. Yes.**  
 16 Q. Gone?  
 17 **A. Yes.**  
 18 Q. We will look at that --  
 19 **A. If you go to the next page, sorry, sir, number 51.**  
 20 Q. Yes.  
 21 **A. That is a training package for the MASTS conversion.**  
 22 Q. Yes.  
 23 **A. May 2010.**  
 24 Q. I will take that up later, if I may, but I am right here  
 25 that in none of this training material then, or

Page 159

1 subsequently, is it the case that you were trained in  
 2 Greater Manchester Police for AFOs to remain in cars as  
 3 cover?  
 4 **A. In Greater Manchester Police we hadn't done stuff like**  
 5 **that, but in the Met training is part of the CT/SFO**  
 6 **programme, that is when we utilised cover from**  
 7 **a vehicle.**  
 8 Q. Yes, I am aware of that, you said that in your  
 9 interview. Here we are talking about a Greater  
 10 Manchester Police operation, aren't we?  
 11 **A. Yes.**  
 12 Q. With Greater Manchester Police trained officers?  
 13 **A. Yes.**  
 14 Q. And --  
 15 **A. Who have been trained also by the Met.**  
 16 Q. You were trained for other purposes by the Met, weren't  
 17 you?  
 18 **A. The CT upskill, yes.**  
 19 Q. Indeed. In terms of Greater Manchester Police, there  
 20 was nothing to suggest that AFOs should cover from cars,  
 21 was there in the training?  
 22 **A. Not as far as I am aware.**  
 23 Q. No.  
 24 I mean the problem, just moving along, the problems  
 25 with what you did in staying in the car, was -- first of

Page 160



<p>1 all, I am going to put a series of points to you just 2 for your comments. 3 The first problem, as I have been putting to you, is 4 that it was inconsistent with any of the training that 5 you had had in GMP, so the others on the operation would 6 be unfamiliar with that. 7 <b>A. It has worked on MASTS before where we have put cover on 8 from a vehicle, so it is a known tactical option.</b> 9 Q. Yes, well it is certainly known elsewhere but as I put 10 to you, it is not within Greater Manchester Police, is 11 it? There is a reason you were not trained on it in 12 Greater Manchester Police, isn't there? 13 <b>A. No.</b> 14 Q. Secondly, it is apparent, isn't it that no one in the 15 other cars on this operation on 3 March knew what you 16 were doing? 17 <b>A. Apparently not, no, sir.</b> 18 Q. It is right, isn't it, that at least one officer went 19 directly across your line of fire? 20 <b>A. I had come off cover then, so I have not seen that 21 officer go across my line of fire.</b> 22 Q. You had come off cover then -- it was J4 went across the 23 bonnet, you just didn't see him? 24 <b>A. No, J4 didn't go across my line of fire.</b> 25 Q. Well, with officers not knowing where you were, of</p> <p style="text-align: center;">Page 161</p>	<p>1 <b>is the limitations of it. As soon as someone came to 2 the wind, my role as cover was redundant.</b> 3 Q. Yes. 4 Fourthly, you were yourself exposed right 5 immediately in front of men who you have told us you 6 thought were armed? 7 <b>A. Yes.</b> 8 Q. You put yourself in a vulnerable position? 9 <b>A. Yes.</b> 10 Q. Next, you have told us that you wore your cap -- 11 <b>A. Yes.</b> 12 Q. -- to identify yourself? 13 <b>A. Yes.</b> 14 Q. That was the only identification? 15 <b>A. Yes.</b> 16 Q. It is right, isn't it, that you had illuminated the 17 torch? 18 <b>A. Yes.</b> 19 Q. So it would have been impossible for anybody looking at 20 you to have seen your cap? 21 <b>A. I don't know, sir.</b> 22 Q. You don't know? 23 <b>A. No.</b> 24 Q. Well, I do not have a firearms torch, you have obviously 25 used and trained with one. They are very bright, aren't</p> <p style="text-align: center;">Page 163</p>
<p>1 course it was perfectly reasonable for them to go across 2 your line of fire, wasn't it? 3 <b>A. The way J4 has gone is in effect he has gone in between 4 cars, which we wouldn't generally do.</b> 5 Q. J4 shouldn't have done that in any event? 6 <b>A. I wouldn't have done that.</b> 7 Q. Thirdly, from where you were pointing your gun, your arc 8 of fire, officers who were approaching were going to go 9 within that in any event, that arc of fire, weren't 10 they? 11 <b>A. They would, when -- they had actually physically made 12 entrance to the car, then yes.</b> 13 Q. X7, for example, who on any view ends up at the driver's 14 window, he would have been within your line of fire? 15 <b>A. No, my arc of fire was strictly between the windscreen 16 of the car basically.</b> 17 Q. How do you limit it in that way, you are pointing a gun 18 outside, through the window, the open window of the car, 19 it is X7 plainly in your view once he reached there. 20 <b>A. I didn't see X7.</b> 21 Q. You didn't see X7 at all? 22 <b>A. No.</b> 23 Q. Anyone turning up at the driver's window would plainly 24 be within your arc of fire, wouldn't they? 25 <b>A. No, my arc of fire was the windscreen of the car. That</b></p> <p style="text-align: center;">Page 162</p>	<p>1 they? 2 <b>A. Yes.</b> 3 Q. Looking at them, help us, please, you wouldn't have been 4 able to see the cap, would you? 5 <b>A. Possibly not, no.</b> 6 Q. No. 7 Next you were, as we have already discussed, 8 challenging them and ordering them to do things when 9 others were rapidly coming upon them? 10 <b>A. Yes.</b> 11 Q. Yes? 12 The likelihood was that there would be involuntary 13 movements? 14 <b>A. I couldn't tell you, sir.</b> 15 Q. That they would be distracted, the subjects be 16 distracted? 17 <b>A. I couldn't tell you.</b> 18 Q. Or faint? 19 <b>A. Or what, sorry?</b> 20 Q. Faint? 21 <b>A. I think that has been known, sir, yes.</b> 22 Q. Or that they would flinch from seeing something coming 23 from left or right or from what you were doing? 24 <b>A. I couldn't tell you how they would react, sir.</b> 25 Q. There would be competing challenges, wouldn't there?</p> <p style="text-align: center;">Page 164</p>

41 (Pages 161 to 164)

<p>1 <b>A. Potentially.</b></p> <p>2 Q. All of that increased the vulnerability of the subjects</p> <p>3 who you were, you say, covering, challenging.</p> <p>4 <b>A. As soon as people -- other officers got to the vehicle,</b></p> <p>5 <b>then, as I said before, my role would be redundant.</b></p> <p>6 Q. The next problem, potential problem, is that if you are</p> <p>7 there, directly in front of them challenging them, is</p> <p>8 that you may well get some kind of panic reaction?</p> <p>9 <b>A. I didn't panic, sir.</b></p> <p>10 Q. Let me put the question more eloquently. They might</p> <p>11 panic?</p> <p>12 <b>A. I can't answer that for them, sir.</b></p> <p>13 Q. There is a real chance, isn't there, that they would do</p> <p>14 something without thought process?</p> <p>15 <b>A. Like I say, I can't answer that.</b></p> <p>16 Q. A real possibility or probability that they would get</p> <p>17 out of the car for example, as indeed Mr Totton did?</p> <p>18 <b>A. That is a possibility, yes, sir.</b></p> <p>19 Q. You have been asked about the dropping of the hand, on</p> <p>20 your account Mr Grainger dropped his right hand.</p> <p>21 You said a few moments ago that he dropped his hand</p> <p>22 to his lap?</p> <p>23 <b>A. Yes, sir.</b></p> <p>24 Q. From where you were, you could only see the top half of</p> <p>25 his chest effectively, couldn't you?</p> <p style="text-align: center;">Page 165</p>	<p>1 impossible to say that it went towards his lap rather</p> <p>2 than towards a handle. That is right, isn't?</p> <p>3 <b>A. No, sir. His hand went down towards his lap.</b></p> <p>4 Q. Next. Your view is not only restricted by the</p> <p>5 dashboard, so you could only see the top half --</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. -- but you couldn't see into the back of the car?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Again, increasing the vulnerability, yes?</p> <p>10 <b>A. The back of the car was in shadow.</b></p> <p>11 Q. Lastly for this purpose, that you, staying in the car,</p> <p>12 meant that the deployment from alpha car was one down?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. In fact what happened was only X7 went down the offside?</p> <p>15 <b>A. And supported later by the --</b></p> <p>16 Q. Later supported by officers from a different car.</p> <p>17 <b>A. Which they would have been filling in and looking for</b></p> <p>18 <b>work.</b></p> <p>19 Q. On your earlier account, the plan, such as it was, was</p> <p>20 for alpha to cover the offside and bravo and charlie to</p> <p>21 cover the nearside?</p> <p>22 <b>A. Bravo to cover the nearside and then charlie to cover --</b></p> <p>23 Q. Bravo to cover the nearside. Any reason you know of why</p> <p>24 that didn't happen?</p> <p>25 <b>A. I don't know, sir.</b></p> <p style="text-align: center;">Page 167</p>
<p>1 <b>A. Yes.</b></p> <p>2 Q. How could you determine where the hand was going?</p> <p>3 <b>A. Because it was a sudden and deliberate movement and that</b></p> <p>4 <b>is the direction his hand was going.</b></p> <p>5 Q. Effectively you are saying the hand just went down?</p> <p>6 <b>A. Yes, towards his lap.</b></p> <p>7 Q. It could have been going to his lap, it could have been</p> <p>8 going to an ignition key?</p> <p>9 <b>A. No.</b></p> <p>10 Q. Why not?</p> <p>11 <b>A. Because it has gone towards his lap.</b></p> <p>12 Q. That is what I am trying to explore with you. How do</p> <p>13 you differentiate the direction of his hand going down</p> <p>14 below the dashboard to an ignition key or to his lap or</p> <p>15 to the handle?</p> <p>16 <b>A. Because it was straight down towards his lap.</b></p> <p>17 Q. We all know where his lap is, we all know where the</p> <p>18 ignition key might be and we all know where the handle</p> <p>19 might be. In order to go for any of those options he</p> <p>20 would be simply dropping his hand, wouldn't he?</p> <p>21 <b>A. Yes, but it went in the direction of his lap.</b></p> <p>22 Q. Are you really able to say that, officer?</p> <p>23 <b>A. That is what happened, sir.</b></p> <p>24 Q. I am putting to you that even if it is right what you</p> <p>25 say, that you saw him drop his hand, it would be</p> <p style="text-align: center;">Page 166</p>	<p>1 Q. Briefly, I want to move on to planning and I --</p> <p>2 THE CHAIRMAN: Sorry to interrupt, Mr Weatherby, but we have</p> <p>3 been going now for a good hour and 20/25 minutes.</p> <p>4 MR WEATHERBY: That is a convenient moment.</p> <p>5 THE CHAIRMAN: If that is a convenient moment, I think we</p> <p>6 should take a break at this stage.</p> <p>7 MR WEATHERBY: Yes.</p> <p>8 (3.26 pm)</p> <p>9 (A short adjournment)</p> <p>10 (3.38 pm)</p> <p>11 MR WEATHERBY: Yes, I wonder whether the curtain is slightly</p> <p>12 obscuring --</p> <p>13 THE CHAIRMAN: Hang on, I know that Mrs Shaw is coming</p> <p>14 round.</p> <p>15 You can do it if you want.</p> <p>16 I know that Mrs Shaw particularly knows exactly</p> <p>17 where it is to go.</p> <p>18 MR WEATHERBY: Can I ask you to get bundle G1, ready,</p> <p>19 please. The one we were looking at.</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Just trying to stay with the subject I was asking you</p> <p>22 about earlier, I think we may be able to make some</p> <p>23 progress on that with just two more documents. I am</p> <p>24 going to ask you to look at page 259 in that document.</p> <p>25 Just by way of explanation, we were considering the</p> <p style="text-align: center;">Page 168</p>

<p>1 training material, and this is some later training 2 material from November 2011.</p> <p>3 <b>A. Okay.</b></p> <p>4 Q. Yes. The later material didn't have the nice diagrams 5 that I was putting to you, they had moving images. So 6 they haven't copied so well so I can't take you to 7 those, but I think these two documents that I am going 8 to show you now may help us. This is the subsequent 9 training material, subsequent to the material that we 10 were discussing earlier. This is headed: 11 "Contain and negotiate stop, offers a tactical 12 option where the threat level has been assessed as 13 proportioned and justified to necessitate the tactical 14 option of a covert vehicle stop, but is deemed to be at 15 the lower level of that scale." 16 Yes?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Before we go on, I am not going to suggest this was 19 directly applicable to the day, and that is right, isn't 20 it?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Reading on: 23 "AFOs will deploy from their vehicles and tactically 24 contain [my emphasis] the subject vehicle on foot by 25 surrounding it. They will then verbally challenge the</p> <p style="text-align: center;">Page 169</p>	<p>1 domination of the subject and allow officers to see 2 inside. In the event the doors will not open or are 3 unable to see into the subject vehicle, they will 4 physically break the vehicle door windows to enable the 5 subjects to be placed on the ground, formally arrested 6 and secured in the immediate vicinity of the subject 7 vehicle."</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. The GMP training for the sort of operation that we are 10 discussing in respect of the shooting of 11 Anthony Grainger, yes, is the immediately detain the 12 subject stop?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. What you were trained to do is to get out of the 15 vehicle, follow the same procedure as the lower risk 16 option, up until the first challenge --</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. -- which is foot officers having contained the vehicle?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. On what you did on 3 March, first of all you didn't get 21 out of the vehicle --</p> <p>22 <b>A. No.</b></p> <p>23 Q. -- you didn't deploy on foot, and you put in the first 24 challenge way before the vehicle was contained?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 171</p>
<p>1 occupants and direct them to exit the vehicle of their 2 own volition. They will be formally arrested and 3 secured in the immediate vicinity of the subject 4 vehicle. If at any point during the execution of the 5 contain and negotiate stop tactic it becomes clear the 6 subjects are not responding to verbal demands and not 7 being compliant, it may be necessary to move to 8 an immediate detain of the subject stop."</p> <p>9 The training is that GMP officers deployed on 10 a vehicle strike are to deploy on foot and contain the 11 vehicle and then extract the subjects, yes?</p> <p>12 <b>A. On that contain and negotiate option, yes.</b></p> <p>13 Q. Yes.</p> <p>14 Next slide, please, page 260: 15 "Immediately detain the subject stop." 16 That is the territory we are in, isn't it?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. "Offers a tactical option within the covert vehicle stop 19 tactic that has been assessed as higher on the threat 20 level scale. The immediately detain the subjects stop 21 is the same as the contain and negotiate stop up to the 22 point of AFOs deploying from their vehicles and making 23 the initial challenge of the subjects. During the 24 initial verbal challenge separate AFOs will attempt to 25 open the doors of the vehicle, thereby increasing the</p> <p style="text-align: center;">Page 170</p>	<p>1 Q. So it was completely at odds with what you had been 2 trained to do?</p> <p>3 <b>A. No.</b></p> <p>4 Q. Well, explain, please.</p> <p>5 <b>A. There is a degree of flexibility and also looking at --</b></p> <p>6 Q. Ah.</p> <p>7 <b>A. To gain tactical advantage, the tactical advantage 8 because of the level of threat that was posed from the 9 vehicle, I deemed it necessary to put cover on to that 10 vehicle to protect the officers who were approaching.</b></p> <p>11 Q. Yes, I am not quibbling at all with flexibility.</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. I fully understand that there has to be flexibility and 14 there has to be change but what you did in putting the 15 challenge in before officers were in a position to 16 contain the vehicle, is that you started the process 17 before there had been any containment, in fact one of 18 the subjects was shot but the other subject wasn't 19 contained, he got out of the car?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. It negated the training that you had been given?</p> <p>22 <b>A. The way you put it, yes, sir.</b></p> <p>23 Q. Moving on to planning, and very briefly on this, in 24 terms of the planning, you were at Amber approaching the 25 car park?</p> <p style="text-align: center;">Page 172</p>

<p>1 <b>A. Yes.</b></p> <p>2 Q. Before the actual plan for this, the tactical plan for</p> <p>3 this operation came into being. Is that right?</p> <p>4 <b>A. I think it was when we had received the picture paint</b></p> <p>5 <b>from the surveillance, of exactly where the vehicle was,</b></p> <p>6 <b>that is when the planning -- how we deploy on to the</b></p> <p>7 <b>vehicle came about.</b></p> <p>8 Q. Well, certainly in terms of you staying in the vehicle,</p> <p>9 your account is that you decided that very late on in</p> <p>10 the process --</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. -- as you either drove on to the car park or just</p> <p>13 shortly before?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. In terms of the rest of the plan, it was either there</p> <p>16 wasn't a plan or alpha went to offside and bravo went to</p> <p>17 nearside?</p> <p>18 <b>A. Yes, which was determined prior to me making the</b></p> <p>19 <b>decision of putting cover on.</b></p> <p>20 Q. The only other part of the plan was to broadside the</p> <p>21 car?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. In terms of who did that planning, obviously you were</p> <p>24 the one that planned to stay in the car --</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 173</p>	<p>1 <b>A. From discussion in the office.</b></p> <p>2 Q. It wasn't something you mentioned in your initial</p> <p>3 account on the night, was it?</p> <p>4 <b>A. No.</b></p> <p>5 Q. It was something you only mentioned six days later, on</p> <p>6 9 March --</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. -- when you had had time to think about things?</p> <p>9 <b>A. No.</b></p> <p>10 Q. Was it that you had decided by that point that this</p> <p>11 would be a helpful way of justifying why you were</p> <p>12 covering from the front of the car?</p> <p>13 <b>A. No.</b></p> <p>14 Q. Is that why you have suggested that there was privacy</p> <p>15 glass on those front windows?</p> <p>16 <b>A. No.</b></p> <p>17 Q. Finally, I just want to go through the necessity for you</p> <p>18 to shoot.</p> <p>19 You know, as a firearms officer, that you are</p> <p>20 entitled to use lethal force only if you honestly</p> <p>21 believed in imminent life-threatening danger, yes?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Objectively we now know there was no life-threatening</p> <p>24 danger of the sort that you say that you believed?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 175</p>
<p>1 Q. -- but in fact it was W4 who planned the broadside</p> <p>2 approach, wasn't it?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. This plan, such as it was, this should have been the</p> <p>5 operational commander's job, shouldn't it?</p> <p>6 <b>A. Well W4 was the driver, so he is in the best position to</b></p> <p>7 <b>decide where our vehicle would be positioned to, you</b></p> <p>8 <b>know, put an effective block in basically.</b></p> <p>9 Q. Without W4 making the plan to broadside and without you</p> <p>10 making the plan to stay in the car, the only plan that</p> <p>11 seems to have been determined by X7 was to go to the</p> <p>12 offside and the nearside?</p> <p>13 <b>A. Potentially, yes.</b></p> <p>14 Q. Now, privacy glass. You know, don't you, that there was</p> <p>15 no privacy glass on the front side windows of the car?</p> <p>16 <b>A. I do now, yes.</b></p> <p>17 Q. Yes.</p> <p>18 Again, I will be corrected if I am wrong but I am</p> <p>19 not aware of anybody else having suggested that there</p> <p>20 was privacy glass to the front passenger and front</p> <p>21 driver's side window?</p> <p>22 <b>A. I thought that was common knowledge in the operations</b></p> <p>23 <b>team which had been fed in from the surveillance team.</b></p> <p>24 Q. Where did you get that notion from, that it was common</p> <p>25 knowledge?</p> <p style="text-align: center;">Page 174</p>	<p>1 Q. As part of a disciplined arrest force of the nature of</p> <p>2 a TFU, are you well aware that in carrying lethal arms,</p> <p>3 you were under an obligation to minimise the risk to</p> <p>4 life?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Yes?</p> <p>7 On your own account you put yourself in a vulnerable</p> <p>8 position, yes?</p> <p>9 <b>A. In what respect?</b></p> <p>10 Q. In front of the subjects you tell us you believed were</p> <p>11 armed.</p> <p>12 <b>A. Potentially could be vulnerable there, yes.</b></p> <p>13 Q. Essentially you ended up guessing what Anthony Grainger</p> <p>14 was doing at the time you shot him?</p> <p>15 <b>A. No.</b></p> <p>16 Q. You saw no imminent lethal threat, did you?</p> <p>17 <b>A. No.</b></p> <p>18 Q. You were in a position with a sophisticated firearm?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. You were 1.88 metres away from Anthony Grainger?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. You had a laser sight trained on him?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. You were clearly in a position to shout another command</p> <p>25 at that point, weren't you?</p> <p style="text-align: center;">Page 176</p>

<p>1 <b>A. No.</b></p> <p>2 Q. On your account, no other officers in the immediate</p> <p>3 vicinity?</p> <p>4 <b>A. No.</b></p> <p>5 Q. Tell us why?</p> <p>6 <b>A. Why what?</b></p> <p>7 Q. Well, no other officer is in the immediate vicinity, why</p> <p>8 were you not in a position to shout another command?</p> <p>9 <b>A. Because the officers were making towards the vehicle, so</b></p> <p>10 <b>I felt the threat to them was extreme because of</b></p> <p>11 <b>Anthony Grainger's actions.</b></p> <p>12 Q. If you truly thought that he was reaching for a firearm,</p> <p>13 why did you not wait to see the firearm?</p> <p>14 <b>A. Because he would have been in a position to fire it, as</b></p> <p>15 <b>soon as he grabbed hold of it, laterally across the car</b></p> <p>16 <b>or upwards towards whoever was going to the driver's</b></p> <p>17 <b>side of the vehicle.</b></p> <p>18 Q. You were trained on him, weren't you?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Did you really believe that he was going to fire from</p> <p>21 below the level of the window?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. If the sequence had been that you had been covering</p> <p>24 Mr Grainger and Mr Totton, and you hadn't seen</p> <p>25 Mr Grainger's hand go down, that Mr Totton had reached</p> <p style="text-align: center;">Page 177</p>	<p>1 expect to be told that, you would expect there to be</p> <p>2 an explicit reference to it?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Thank you.</p> <p>5 You were asked in your interview about this a few</p> <p>6 times and I would like to look at the answer you gave at</p> <p>7 B/121, which is your later interview of 13 June. It is</p> <p>8 tab 1 of your bundle.</p> <p>9 It is B, for other people, 121.</p> <p>10 It should be 121 in the top right-hand corner, Q9,</p> <p>11 can you see that?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. It should say page 15 of 36 as well, to make things</p> <p>14 confusing.</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. You were asked about the suggestion that your officers</p> <p>17 and you had not had any intelligence that day to</p> <p>18 indicate that Mr Grainger was actually in possession of</p> <p>19 a firearm. Do you see that question?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. You say this:</p> <p>22 "No, but the whole picture painted from the</p> <p>23 intelligence was these were three people in a car, who</p> <p>24 were going to commit an armed robbery in Culcheth. My</p> <p>25 rationale is that you don't commit an armed robbery</p> <p style="text-align: center;">Page 179</p>
<p>1 for the door handle and did what he subsequently did, on</p> <p>2 your evidence you would have shot him, wouldn't you?</p> <p>3 <b>A. If he was reaching down in the same direction in his</b></p> <p>4 <b>lap, then yes.</b></p> <p>5 <b>MR WEATHERBY: Yes, that is all I ask.</b></p> <p>6 THE CHAIRMAN: Mr Davies?</p> <p>7 MS WHYTE: I think I am ahead of Mr Davies in terms of</p> <p>8 order, unless ...</p> <p>9 THE CHAIRMAN: Of course, you are quite right.</p> <p>10 Questions from MR WHYTE</p> <p>11 MS WHYTE: Q9, I appreciate you cannot see me completely.</p> <p>12 My name is Anne Whyte and I ask questions on behalf of</p> <p>13 the Greater Manchester Police.</p> <p>14 <b>A. Yes, ma'am.</b></p> <p>15 Q. I hope you can hear me, even though you cannot see me.</p> <p>16 <b>A. Yes ma'am.</b></p> <p>17 Q. Thank you.</p> <p>18 I have a very limited number of questions for you.</p> <p>19 I would like to go back to the briefing that you</p> <p>20 received in relation to this particular deployment, all</p> <p>21 right?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Is it fair to say that if there was specific recent</p> <p>24 intelligence that any of the subjects were in possession</p> <p>25 of or had access to a firearm or weapon, you would</p> <p style="text-align: center;">Page 178</p>	<p>1 without a firearm."</p> <p>2 Yes?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Do you accept that it is fair to say that yes, some</p> <p>5 robberies and indeed serious robberies can be committed</p> <p>6 with firearms?</p> <p>7 <b>A. Yes, ma'am.</b></p> <p>8 Q. They can also be committed with other serious but less</p> <p>9 evidently lethal weapons?</p> <p>10 <b>A. Yes, ma'am.</b></p> <p>11 Q. Is that fair?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Then you go on to say:</p> <p>14 "The intelligence that had lead up, the preparation,</p> <p>15 they had done round Sainsbury's the previous</p> <p>16 intelligence where they had broken into a bank in</p> <p>17 Preston ..."</p> <p>18 So you then refer to two other matters, you refer to</p> <p>19 the recent intelligence about preparations, as you</p> <p>20 described it. Is that the information you had received</p> <p>21 about recesses?</p> <p>22 <b>A. Yes, ma'am.</b></p> <p>23 Q. Part of that an assessment that the recesses had or at</p> <p>24 least one recess had focused on Sainsbury's?</p> <p>25 <b>A. Yes, ma'am.</b></p> <p style="text-align: center;">Page 180</p>

45 (Pages 177 to 180)

<p>1 Q. Then you refer to the more historic intelligence about 2 Preston and what you thought might have happened there? 3 <b>A. Yes, ma'am.</b> 4 Q. Then you refer back to Sainsbury's again. Was your view 5 of the threat level also affected by the fact that these 6 subjects appeared to be using a high powered very 7 expensive car which was stolen and on false plates? 8 <b>A. Yes, ma'am.</b> 9 Q. Do you agree that on one view the message in very 10 general terms from the briefing was that other people, 11 not you but those tasked with preparing briefings and 12 assessing the threat, had assessed that these men 13 together had the capability to have or obtain access to 14 firearms or other weapons? 15 <b>A. Yes, ma'am.</b> 16 Q. Just a couple of other issues. 17 You haven't been asked I don't think, I apologise if 18 I haven't heard it, at the level at which you expressed 19 the command to the occupants in the car. In your 20 interviews, more than once, you referred to it in effect 21 as screaming at them? 22 <b>A. Yes, ma'am.</b> 23 Q. By that, did you mean to imply that it was even louder 24 than shouting or were you trying to suggest something 25 else?</p> <p style="text-align: center;">Page 181</p>	<p>1 <b>A. Yes, ma'am.</b> 2 Q. Is it fair to suggest it is a little bit more 3 complicated and detailed than that? 4 <b>A. Yes.</b> 5 Q. You will practise on your training conventional stops. 6 That might indeed involve a regularity or conformity 7 around where the police vehicles might stop in relation 8 to the subject vehicle. Is that fair? 9 <b>A. Yes, ma'am.</b> 10 Q. But not where each individual police officer would 11 deploy, unless specifically tasked with a shotgun role 12 or a CS role? 13 <b>A. Yes, ma'am.</b> 14 Q. In your training, do you work to a variety of scenarios 15 whereby cars are repositioned, both subject cars and 16 police cars, and the students rotate roles? 17 <b>A. Yes, ma'am.</b> 18 Q. Does that include each student deploying at different 19 times during the training from different positions 20 within what I am going to call the convoy? 21 <b>A. Yes.</b> 22 MS WHYTE: Yes. 23 Thank you very much, that is all I have to ask you. 24 Thank you, sir. 25</p> <p style="text-align: center;">Page 183</p>
<p>1 <b>A. No, it was louder than shouting.</b> 2 Q. You have been asked about what you could see on 3 Mr Grainger's hands. Could you see what, if anything, 4 Mr Totton was wearing on his? 5 <b>A. He was wearing gloves, ma'am.</b> 6 Q. Finally, if you could pop that smaller bundle to one 7 side, because I know there is not much room up there. 8 Could you go to bundle G1, where the training packages 9 are. Could I ask you, please, to turn to page 73 of 10 bundle G1. 11 You have talked about a conversion course -- 12 <b>A. Yes, ma'am.</b> 13 Q. -- in respect of MASTS. Here we can see a package 14 relating to a MASTS conversion course dated May 2010. 15 <b>A. Yes.</b> 16 Q. That seems to accord with your recollection of when the 17 conversion was being trained and rolled out? 18 <b>A. Yes, ma'am.</b> 19 Q. If we could just go through this very briefly, the way 20 in which it was put by Mr Weatherby in effect was, well, 21 if it is simply about flexibility, on your training, you 22 are simply going to be on a training course to be told 23 to find work. Do you remember that discussion between 24 yourself and Mr Weatherby a little earlier this 25 afternoon?</p> <p style="text-align: center;">Page 182</p>	<p>1 Questions from MR DAVIES 2 MR DAVIES: Let me start with training if I may, while we 3 are on it. 4 Ms Whyte has asked you generally as to the way the 5 team is trained to find work in the new model of 6 deployment for these sorts of stops, okay? 7 <b>A. Yes, sir.</b> 8 Q. Are AFOs tested on their ability to do the right thing 9 in these dynamic situations as part of that training? 10 <b>A. Yes.</b> 11 Q. If an AFO is, so to speak, not showing the right 12 instincts, the right patterns of response in these 13 dynamic training exercises. Do they pass or fail the 14 test? 15 <b>A. Potentially they could fail the test.</b> 16 Q. They won't be authorised to do MASTS until they have 17 demonstrated competence? 18 <b>A. Yes.</b> 19 Q. Although it is find work, it is find work according to 20 a trained set of principles that are designed to promote 21 the right instinct on the ground? 22 <b>A. Yes, sir.</b> 23 Q. One of the general principles, not absolute rules, one 24 of the general principles is you don't run between 25 a firearms deployed car and the subject car?</p> <p style="text-align: center;">Page 184</p>

<p>1 <b>A. No.</b></p> <p>2 Q. For some perhaps quite obvious reasons.</p> <p>3 You were asked whether you had the right temperament</p> <p>4 for your role --</p> <p>5 <b>A. Yes, sir.</b></p> <p>6 Q. -- as a firearms officer and you said yes.</p> <p>7 Again, is temperament something that is reviewed,</p> <p>8 considered, even at the point at which you apply to be</p> <p>9 an AFO?</p> <p>10 <b>A. Yes, quite heavily.</b></p> <p>11 Q. Can you explain that in more detail?</p> <p>12 <b>A. You would go to assessments, down to the Firearms Unit</b></p> <p>13 <b>and those assessments would test your temperament under</b></p> <p>14 <b>stressful situations, just to make sure that you, you</b></p> <p>15 <b>know, you acted as an AFO should act.</b></p> <p>16 Q. Yes.</p> <p>17 Are your supervisors consulted as to your</p> <p>18 suitability when you apply?</p> <p>19 <b>A. Yes, previous supervisors, probably from command level</b></p> <p>20 <b>of whatever division you came off, through to your</b></p> <p>21 <b>actual immediate supervisor.</b></p> <p>22 Q. Yes. Then there is the training itself.</p> <p>23 Just remind us for how many years you had been</p> <p>24 an AFO or above by the time of this incident?</p> <p>25 <b>A. I joined the Tactical Firearms Unit in November 2005, so</b></p> <p style="text-align: center;">Page 185</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. You have consistently passed?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Deploying as a MASTS platform or tactic, whatever</p> <p>5 language is used about it, in your mind was there</p> <p>6 a pre-determined outcome to any such MASTS deployment?</p> <p>7 <b>A. No.</b></p> <p>8 Q. I think you have covered it, but in what proportion of</p> <p>9 such MASTS deployments does it end in you actually doing</p> <p>10 something, if I can put it in that rather crude</p> <p>11 language?</p> <p>12 <b>A. I would probably say 10 per cent.</b></p> <p>13 Q. 10 per cent.</p> <p>14 When you set out on 3 March 2012, having had</p> <p>15 a briefing that said the so-described tactic was MASTS,</p> <p>16 in your mind was there any expectation one way or the</p> <p>17 other whether it would end in a vehicle strike?</p> <p>18 <b>A. No. It could end in a foot deployment or a building</b></p> <p>19 <b>deployment, depending --</b></p> <p>20 Q. Or nothing?</p> <p>21 <b>A. All variants, yes.</b></p> <p>22 Q. You have been asked to give, over the period of time</p> <p>23 since this has happened, a number of accounts in</p> <p>24 different contexts.</p> <p>25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 187</p>
<p>1 <b>seven years.</b></p> <p>2 Q. Seven years, and you remain so attached?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Again, you had regular training. Is one of the things</p> <p>5 that is tested in training your reaction to a stimulus</p> <p>6 that may or may not be a threat justifying the discharge</p> <p>7 of your weapon?</p> <p>8 <b>A. Yes, that is constantly trained.</b></p> <p>9 Q. How many times is that trained or tested?</p> <p>10 <b>A. On every -- probably on every training session, other</b></p> <p>11 <b>than accuracy shooting.</b></p> <p>12 Q. How many times a year is that quality of reaction</p> <p>13 tested, typically?</p> <p>14 <b>A. Typically? I think as an SFO, your training commitments</b></p> <p>15 <b>are probably eight weeks a year, where you would be</b></p> <p>16 <b>doing different stuff.</b></p> <p>17 Q. This is, to state the obvious, where a target presents,</p> <p>18 you have to make a split-second decision on how you</p> <p>19 react?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Some would be benign targets, some would be a man with</p> <p>22 a firearm?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Again, if your tested reaction is not adequate, you</p> <p>25 fail?</p> <p style="text-align: center;">Page 186</p>	<p>1 Q. All right. Your initial account was on the night of the</p> <p>2 event.</p> <p>3 <b>A. Yes, sir.</b></p> <p>4 Q. Can you recall now what time, approximately, it was that</p> <p>5 you provided that initial written account through</p> <p>6 Mr Mackie?</p> <p>7 <b>A. Approximately it was early hours of the morning, so it</b></p> <p>8 <b>could have been -- any time between 1.00 and 3.00,</b></p> <p>9 <b>something like that.</b></p> <p>10 Q. Right. You had been up in relation to the deployment on</p> <p>11 3 March, the day before, at what time?</p> <p>12 <b>A. About 4.00 in the morning.</b></p> <p>13 Q. Right.</p> <p>14 Had you had any significant or any sleep in the</p> <p>15 period between 4.00 in the morning and this initial</p> <p>16 account in the early hours of the following day?</p> <p>17 <b>A. No, it is not something I do when on a deployment.</b></p> <p>18 <b>I don't -- you know, some of the operators may sleep but</b></p> <p>19 <b>it is not something I do.</b></p> <p>20 Q. By the time you gave your initial account, of course,</p> <p>21 you had been informed, or you knew directly from the</p> <p>22 scene, that you had I think for the first time in your</p> <p>23 career, engaged somebody with lethal effect?</p> <p>24 <b>A. Yes, sir.</b></p> <p>25 Q. And the post-incident procedure was taking effect?</p> <p style="text-align: center;">Page 188</p>

<p>1 <b>A. Yes.</b>                  2 Q. By the time you gave your account, you had had to                  3 surrender your weapons, had some food and so on?                  4 <b>A. Yes, sir.</b>                  5 Q. How were you feeling at 3.00 in morning, giving this                  6 initial account?                  7 <b>A. Pretty devastated at the time.</b>                  8 Q. Of course it was directed at being an initial account                  9 for the purposes of enabling properly the IPCC to direct                  10 its own independent investigation?                  11 <b>A. Yes, sir.</b>                  12 Q. That had already started?                  13 <b>A. Yes.</b>                  14 Q. It was not presented to you as something that was                  15 supposed to be an exhaustive account, was it?                  16 <b>A. No.</b>                  17 Q. The next account is a witness statement of 9 March.                  18 <b>A. Yes, sir.</b>                  19 Q. We have heard a lot about that but, again, was that                  20 presented to you as requiring you to give an exhaustive                  21 account of each and every thing you knew about every                  22 person linked to Operation Shire?                  23 <b>A. No, sir.</b>                  24 Q. We will come back to that in a second. You were then                  25 interviewed, I think on two occasions, by the IPCC.</p> <p style="text-align: center;">Page 189</p>	<p>1 would the possibility of non-firearms being used for                  2 armed robbery have affected your actions at the scene?                  3 <b>A. No.</b>                  4 Q. Why not?                  5 <b>A. Because of the capability of the subjects.</b>                  6 Q. Right. Although it was suggested to you, by Mr Beer,                  7 that other officers have filled in differently to you                  8 from the briefing in terms of whether the armed                  9 robberies were necessarily firearms based --                  10 <b>A. Yes.</b>                  11 Q. -- you are aware that they have each reached the                  12 identical capability assessment for the group, in other                  13 words, they may have had firearms?                  14 <b>A. Yes, sir.</b>                  15 Q. Can you just look to the general firearms bundle,                  16 please, I want to just ask a couple of questions arising                  17 from the briefing. General firearms bundle, I hope it                  18 is tab 22. It should be the PowerPoint presentation.                  19 <b>A. Yes, sir.</b>                  20 Q. I would like you to turn, please, to page 12.81 of that,                  21 bottom right-hand corner, you have covered the rest with                  22 others already.                  23 Do you have that?                  24 <b>A. Foot interception?</b>                  25 Q. Foot interception.</p> <p style="text-align: center;">Page 191</p>
<p>1 In April and June respectively of 2012?                  2 <b>A. Yes, sir.</b>                  3 Q. That being, obviously, five weeks or so after the event,                  4 four and a half five weeks, and even more, three months,                  5 for the June interview?                  6 <b>A. Yes, sir.</b>                  7 Q. Right.                  8 Let me concentrate questions then on the briefing of                  9 3 March.                  10 You obviously had, both from prior Shire briefings                  11 and prior policing experience, some knowledge of some of                  12 the subjects of this operation?                  13 <b>A. Yes, sir.</b>                  14 Q. In terms of your threat assessment, when deployed on the                  15 date, can you just explain again what you based your                  16 threat assessment on in fact?                  17 <b>A. The threat assessment employed on the day was the</b>                  18 <b>information we were given during the briefing that they</b>                  19 <b>were engaged in armed robberies, the information</b>                  20 <b>relating to the robbery in the bank in Preston and the</b>                  21 <b>actual weapons they had used during that robbery.</b>                  22 Q. Yes.                  23 Even if you had interpreted the words "armed                  24 robbery" or "armed robberies" to include weapons other                  25 than firearms, even if you had done that in context,</p> <p style="text-align: center;">Page 190</p>	<p>1 <b>A. Yes, sir.</b>                  2 Q. If we turn on, page 12.82 is the next slide "Overview of                  3 shopping arcade".                  4 <b>A. Yes.</b>                  5 Q. All right? The area highlighted is Sainsbury's?                  6 <b>A. Yes, sir.</b>                  7 Q. What was your interpretation of the focus on                  8 Sainsbury's, given this PowerPoint and the terms of the                  9 briefing you received?                  10 <b>A. I believed Sainsbury's was going to be a potential</b>                  11 <b>target for the subjects and a lot of the focus was on</b>                  12 <b>Sainsbury's, to the point where they had put</b>                  13 <b>a contingency plan -- well a direct contact plan</b>                  14 <b>together.</b>                  15 Q. All right, we will come on to that.                  16 At 7.00 pm, or thereabouts, just afterwards when you                  17 went to State Amber and State Red, in your mind, was                  18 Sainsbury's still a viable target for armed robbery?                  19 <b>A. Yes, sir.</b>                  20 Q. Why was that?                  21 <b>A. Because the store was still open and it had been trading</b>                  22 <b>all day on a Saturday. So I would assume that it would</b>                  23 <b>be heavily laden with cash.</b>                  24 Q. If we just continue with the briefing, page 1283. You                  25 were briefed, were you not, as to eight potential</p> <p style="text-align: center;">Page 192</p>



1 subject premises?  
 2 **A. Yes, sir.**  
 3 Q. Some of which were banks, that reasonably could be  
 4 presumed to have shut by 7.00 pm --  
 5 **A. Yes.**  
 6 Q. -- but there were other commercial premises that were  
 7 not, including Sainsbury's?  
 8 **A. Yes, sir.**  
 9 Q. Sticking with this, I will turn to the actual language  
 10 of the briefing in a minute, the next slide is the  
 11 shopping parade, all right?  
 12 **A. Yes.**  
 13 Q. We then come on to a direct contact sheet?  
 14 **A. Yes, sir.**  
 15 Q. The slide after that is of the listed premises and  
 16 Sainsbury's is in the middle of that plan, plainly?  
 17 **A. Yes, sir.**  
 18 Q. If you turn to tab 23, please, the following tab. It is  
 19 page 10 of 16, page 341, if that is easier.  
 20 **A. Yes, sir.**  
 21 Q. This is the briefing and just looking at that, this is  
 22 the briefing officer saying:  
 23 "This is the area they have been taking most  
 24 interest in ... you have a copy of that ... direct  
 25 contact, if the subjects do come to this location, they

Page 193

1 have been seen to park up in this car park here and they  
 2 have been taking particular observing this area here,  
 3 which is a secure compound. This all is Sainsbury's and  
 4 that is the entrance to Sainsbury's Superstore here.  
 5 There is a locked gate there and a padlocked gate there.  
 6 Here on this bush line it has got a metal fence behind  
 7 it and they have been seen driving up here and a third  
 8 subject has been seen emerging from this bush line here  
 9 with a hacksaw and getting into the vehicle and driving  
 10 off.  
 11 "There is nothing to suggest other than obviously  
 12 they have had their recess, but whether this going to be  
 13 the target we don't know. However, if they do gain  
 14 entry into this, the deployment will be four-car  
 15 convoy ..."  
 16 **A. Yes, sir.**  
 17 Q. All right.  
 18 You were being told it wasn't known that Sainsbury's  
 19 was the target, as a fact --  
 20 **A. Yes.**  
 21 Q. -- but the evidence as to previous direct and relatively  
 22 immediate surveillance was consistent with that?  
 23 **A. Yes, sir.**  
 24 Q. Hence the direct contact and the foot interception were  
 25 focusing on Sainsbury's, weren't they?

Page 194

1 **A. Yes, sir.**  
 2 Q. Again, when you get to the point of going to Amber, and  
 3 as specifically going to Red, State Red. Given the  
 4 location of the subject vehicle, given your briefing,  
 5 what was that telling you in your mind as to the intent  
 6 of the occupants of that vehicle?  
 7 **A. The subjects were going to rob Sainsbury's.**  
 8 Q. You have been asked as to Operation Blythe and whether  
 9 and how that came into your reasoning.  
 10 **A. Yes.**  
 11 Q. You were asked the question, although I accept it wasn't  
 12 a suggestion, by Mr Beer as to whether in effect you had  
 13 added in information between your initial account and  
 14 your first statement and/or interviews, in particular  
 15 between your statement and your first interview.  
 16 **A. Yes.**  
 17 Q. So to speak to improve your position, and you said you  
 18 hadn't?  
 19 **A. I hadn't, no.**  
 20 Q. Right.  
 21 Can we just look then at your statement and what it  
 22 was directed at. Back to your statement of 9 March,  
 23 please. I think this is your tab 1 of your specific  
 24 bundle.  
 25 **A. Yes, sir.**

Page 195

1 Q. The first page is simply an iteration of your training  
 2 and experience --  
 3 **A. Yes.**  
 4 Q. -- which I need not rehearse, something like two-thirds  
 5 of a page of text summarising that in very short form?  
 6 **A. Yes, sir.**  
 7 Q. The top of the next page is:  
 8 "On Saturday, 3 March 2012 I came on duty at 4.30 am  
 9 for Operation Shire, which had firearms authority number  
 10 77/12."  
 11 **A. Yes, sir.**  
 12 Q. Correct?  
 13 You set out a summary of the briefing as part of the  
 14 narrative going on to page 268, your arrival at Leigh  
 15 police station?  
 16 **A. Yes.**  
 17 Q. It is in that context that you say:  
 18 "There was a discussion at some point during the  
 19 afternoon of the robbery at a bank in Bolton."  
 20 **A. Yes, sir.**  
 21 Q. Was there any discussion in the course of the events at  
 22 Leigh police station of Operation Blythe?  
 23 **A. Not that I can remember, no, sir.**  
 24 Q. Accordingly, have you referred to it in your witness  
 25 statement?

Page 196

<p>1 <b>A. No, sir.</b>                  2 Q. Your statement continues just with an account of the                  3 events, doesn't it?                  4 <b>A. Yes, sir.</b>                  5 Q. Culminating in your statement as to your justification                  6 for shooting Mr Grainger.                  7 <b>A. Yes, sir.</b>                  8 Q. In terms of the narrative event, it completes on 271 in                  9 the penultimate paragraph with your return to the                  10 Tactical Firearms Unit and effectively following                  11 procedure, surrendering your weapons and so on?                  12 <b>A. Yes, sir.</b>                  13 Q. This is a statement, isn't it, as to events on the day                  14 and nothing else?                  15 <b>A. Yes, sir.</b>                  16 Q. It isn't everything I know about Anthony Grainger --                  17 <b>A. No, sir.</b>                  18 Q. -- or anyone else for that matter?                  19 <b>A. No.</b>                  20 Q. In interview, page 29 of your first interview, Blythe                  21 comes up, doesn't it?                  22 <b>A. Yes, sir.</b>                  23 Q. Because you are asked, at the bottom of page 29.                  24 <b>A. Yes, sir.</b>                  25 Q. Question:</p> <p style="text-align: center;">Page 197</p>	<p>1 <b>one of the old ops team sergeants was involved in that</b>                  2 <b>reconstruction.</b>                  3 Q. Right.                  4 Let's get to the event itself. There comes a point                  5 where it is known to the operation as a whole, but not                  6 communicated to you it seems, that one of the subjects                  7 is not Mr Rimmer, about whom you had been briefed --                  8 <b>A. Yes.</b>                  9 Q. -- but a third but unknown male?                  10 <b>A. Yes, sir.</b>                  11 Q. In terms of the fact this was put to you as a joint                  12 enterprise, a conspiracy to commit armed robbery --                  13 <b>A. Yes.</b>                  14 Q. -- does it affect the risk that you have a completely                  15 unknown quantity in that vehicle with two known                  16 quantities?                  17 <b>A. No, sir.</b>                  18 Q. Does it in any way reduce the risk?                  19 <b>A. No, sir.</b>                  20 Q. You have been asked whether there was a plan in this                  21 dynamic situation for what you would do beyond what was                  22 so to speak discussed in the car with X7 and other                  23 colleagues --                  24 <b>A. Yes, sir.</b>                  25 Q. -- to T-bone the subject car --</p> <p style="text-align: center;">Page 199</p>
<p>1 "In terms of Anthony Grainger, what did you know                  2 about Anthony Grainger?"                  3 <b>A. Yes, sir.</b>                  4 Q. You answer:                  5 "The first thing with Anthony Grainger was in                  6 2008 ..."                  7 <b>A. Yes, sir.</b>                  8 Q. When you were asked about Anthony Grainger you answer                  9 it, but it was not part of the discussion at Leigh                  10 police station --                  11 <b>A. No, sir.</b>                  12 Q. -- and hence not in your statement.                  13 Insofar as there was discussion at Leigh police                  14 station, did it affect your evaluation at the scene                  15 later?                  16 <b>A. No, sir.</b>                  17 Q. You have covered at pages 78 and 79 of your interview,                  18 I am not going to labour through it now, the context for                  19 that. In particular the middle of page 78, that the                  20 context was a discussion as to which of these robberies                  21 had been part of a television recreation for Crimewatch?                  22 <b>A. Yes, sir.</b>                  23 Q. Can you elaborate on the context of any discussion of                  24 previous incidents, just shortly?                  25 <b>A. That was just the reconstruction of a robbery whereby</b></p> <p style="text-align: center;">Page 198</p>	<p>1 <b>A. Yes.</b>                  2 Q. -- and for you to maintain cover on the subjects through                  3 the front windscreen.                  4 <b>A. Yes, sir.</b>                  5 Q. Bearing in mind these were subjects that were believed                  6 to have the capability of using firearms --                  7 <b>A. Yes, sir.</b>                  8 Q. -- and that they had on the surveillance been there for                  9 some 28 minutes or thereabouts in the corner of a car                  10 park --                  11 <b>A. Yes, sir.</b>                  12 Q. -- that there had been a gap in surveillance in terms of                  13 eyes on the vehicle --                  14 <b>A. Yes.</b>                  15 Q. -- that it was in a position consistent with a robbery                  16 at Sainsbury's --                  17 <b>A. Yes, sir.</b>                  18 Q. -- what was your assessment when the strike was called                  19 as to whether this was a situation that had reached                  20 a point where firearms may be in the vehicle?                  21 <b>A. I was sure that firearms were in the vehicle, because</b>                  22 <b>they were going to commit an armed robbery.</b>                  23 Q. Were or might be at least in the vehicle?                  24 <b>A. Yes.</b>                  25 Q. They would have access to firearms?</p> <p style="text-align: center;">Page 200</p>

1 **A. Access to firearms, yes.**  
 2 Q. In a dynamic situation -- measured in seconds not the  
 3 hours we have to review it here -- if you had not put  
 4 cover on through that offside rear window, what  
 5 protection would officers have had from people in the  
 6 front of the subject vehicle, the red Audi?  
 7 **A. None.**  
 8 Q. Whilst officers were running round to get in position?  
 9 **A. None.**  
 10 Q. What protection would the driver of your vehicle have  
 11 had?  
 12 **A. None.**  
 13 Q. What protection would you have had?  
 14 **A. None.**  
 15 Q. It seems to be suggested you shouldn't have done what  
 16 you did to maintain cover on the occupants through the  
 17 windscreen, pending the arrival of other officers,  
 18 because it put you at risk?  
 19 **A. Yes.**  
 20 Q. Of course it did?  
 21 **A. Yes.**  
 22 Q. But had there been no cover used by you from that  
 23 position, when you were in a position to do it, and you  
 24 or the driver or another officer had been shot, what  
 25 would have been said to you then do you think?

Page 201

1 **A. "Why didn't you put cover on the vehicle?"**  
 2 Q. Had Mr Grainger continued to comply with your order,  
 3 would you have shot him?  
 4 **A. No.**  
 5 Q. Were you under a duty to protect other officers' lives  
 6 as well?  
 7 **A. Yes.**  
 8 Q. What interpretation in the context in which this was  
 9 happening did you place on the fact that both the front  
 10 seat occupants when they raised their hands were wearing  
 11 gloves, as you put in your original statement?  
 12 **A. That that was part of their wear to commit armed**  
 13 **robberies, that is the sort of stuff that, you know, if**  
 14 **you are going to commit an armed robbery, that is the**  
 15 **sort of thing you are wearing.**  
 16 Q. Could you see any other reason that night for them to be  
 17 wearing gloves?  
 18 **A. No.**  
 19 Q. Do you need to wear gloves to conduct a recce, a further  
 20 recce of premises?  
 21 **A. No.**  
 22 Q. The movement down by the right hand of Mr Grainger to  
 23 the groin area or his lap, whichever expression you  
 24 choose to use. Was it capable of the interpretation, on  
 25 what you saw, of him reaching for the door handle?

Page 202

1 **A. No, sir.**  
 2 Q. Had he twisted his body at all as if to open the door?  
 3 **A. No, sir.**  
 4 Q. This was a sudden and deliberate movement in violation  
 5 of your express instruction?  
 6 **A. Yes, sir.**  
 7 Q. At that point, let's be clear about it, did you know  
 8 precisely where your fellow officers were relative to  
 9 his vehicle?  
 10 **A. No.**  
 11 Q. To your knowledge, is it possible to discharge a weapon  
 12 from inside a vehicle.  
 13 **A. Yes, sir.**  
 14 Q. Even speculatively, without necessarily even aiming at  
 15 a target --  
 16 **A. Yes, sir.**  
 17 Q. -- such as to penetrate the skin of the vehicle with  
 18 lethal effect to those outside?  
 19 **A. Yes, the skin or the windows.**  
 20 Q. Including any metal barrier, a round will get through  
 21 that?  
 22 **A. Yes.**  
 23 Q. You have been questioned on the basis your use of your  
 24 weapon somehow may have endangered other officers?  
 25 **A. No, sir.**

Page 203

1 Q. What calibre of type of rounds did you use and why when  
 2 you discharged your weapon as you did?  
 3 **A. The calibre was 9 millimetre, which is 1.24 grain with**  
 4 **a hollow point.**  
 5 Q. For those not versed in this area, the 1.28 grain --  
 6 THE CHAIRMAN: 1.24.  
 7 MR DAVIES: 24, sorry, grain, has the capacity to do what in  
 8 terms of entering a vehicle?  
 9 **A. It was brought into effect to make sure that we could**  
 10 **fire a round which would penetrate laminated glass,**  
 11 **ie a windscreen.**  
 12 Q. And the hollow point?  
 13 **A. The hollow point is to dissipate the energy as soon as**  
 14 **it hits its target.**  
 15 Q. To prevent the round passing through the person and  
 16 endangering others behind?  
 17 **A. Yes.**  
 18 Q. In other words, it dumps all its energy into the person  
 19 you hit and stops the round.  
 20 **A. Yes.**  
 21 Q. Both men appeared to respond immediately to your  
 22 command?  
 23 **A. Yes, sir.**  
 24 Q. But only one of them continued to obey it?  
 25 **A. Yes.**

Page 204

1 Q. Let me just go on to the penultimate point, as to  
 2 Mr Totton getting out of the vehicle. You have been  
 3 asked some questions about that.  
 4 **A. Yes, sir.**  
 5 Q. All right, back to your 9 March statement, please,  
 6 page 270.  
 7 **A. Yes.**  
 8 Q. You have set out your use of your weapon against  
 9 Mr Grainger, did you know it was Mr Grainger rather than  
 10 Mr Totton?  
 11 **A. No.**  
 12 Q. You are concentrating on hands, presumably because that  
 13 is where the danger may lie?  
 14 **A. Yes, sir.**  
 15 Q. You say this, third from last paragraph:  
 16 "I could see the front seat passenger still had his  
 17 hands above the dashboard. I focused my cover back onto  
 18 the driver. I couldn't see his hands so I was watching  
 19 for any movement and assessing what threat he still  
 20 posed to the approaching officers.  
 21 "I then saw that the front seat passenger had  
 22 started to get out of the of the vehicle. I knew that  
 23 the approaching officers would be on aim with their  
 24 weapons and would be able to see the passenger getting  
 25 out and deal with any threat that he posed. I continued

Page 205

1 to cover the driver ..."  
 2 On that account you haven't described Mr Totton's  
 3 body position relative to you, but was he face on, back  
 4 to you or what?  
 5 **A. Back to me.**  
 6 Q. To state the obvious, given that he has his back to you,  
 7 what was your assessment of threat in terms of him  
 8 discharging a weapon at you?  
 9 **A. It was more of -- he wouldn't be able to discharge**  
 10 **a weapon at me, but it was more as he was get out he was**  
 11 **in a stooped position, as if he was going to the floor.**  
 12 Q. As if he was going to the floor anyway?  
 13 **A. Yes.**  
 14 Q. So he has his back to you and in any event he was going  
 15 to the floor?  
 16 **A. It appeared to me that, yes.**  
 17 Q. You have been asked questions about page 58 of your  
 18 interview in this context, I am not going to go back to  
 19 that and argue about where a comma is, but at page 139,  
 20 please, of your interviews, this subject was revisited,  
 21 wasn't it, in other interviews?  
 22 **A. Yes.**  
 23 Q. Yes?  
 24 If we start at 137, lower half of the page.  
 25 **A. Yes, sir.**

Page 206

1 Q. I'm not reading every word of it, but:  
 2 "... Grainger went down to his lap to grab  
 3 something, I believe that was a firearm, his other arm's  
 4 come down, I have shot Grainger and then Totton still  
 5 has his hands up and I switch my arc bark to see what he  
 6 was doing and back to Grainger. Then that is when next  
 7 time I have looked at Totton he has been getting on you  
 8 of the vehicle."  
 9 What are your thoughts? Is the question in terms of  
 10 Totton exiting the vehicle:  
 11 "I thought he would get dealt with by the actual  
 12 approaching rest of the team that was approaching from  
 13 the nearside."  
 14 You go back to it on 139, top of the page:  
 15 "That is why I've not engaged Totton or dealt with  
 16 him, because he was getting out of the car and somebody  
 17 would have been on aim with a weapon approaching him."  
 18 Correct?  
 19 **A. Yes, sir.**  
 20 Q. Page 140, lower half of the page, you were asked again  
 21 about the threat posed by Mr Totton.  
 22 "Answer: Because that threat -- you know there was  
 23 no threat. He was getting out of the car, he was again,  
 24 you know, in a position where he was not grabbing  
 25 a firearm, he was getting out. Because it obviously

Page 207

1 would have been dealt with -- if he had a firearm it  
 2 would have been dealt with by the team approaching."  
 3 The same proposition at 142.  
 4 **A. Yes, sir.**  
 5 Q. And at page 144 --  
 6 **A. Yes, sir.**  
 7 Q. -- last five lines, six lines:  
 8 "Next time I have switched my arc back to Totton he  
 9 was getting out of car, I didn't see Totton bring his  
 10 hands down, I didn't see him reach towards the handle of  
 11 the car to get out. What I saw was Totton roll out of  
 12 the car on his back, getting out of car. So my only  
 13 response to that would be to shoot him in the back.  
 14 I didn't feel at that time he was enough of a threat for  
 15 me to deliver a shot to his back, because the  
 16 approaching team, the rest of the firearms team, would  
 17 have dealt with Totton as he was getting oft the car.  
 18 If they had seen a threat that he posed, a firearms  
 19 threat, then they would have dealt with it."  
 20 **A. Yes, sir.**  
 21 Q. All right, at some length, and you were not taken to  
 22 that earlier, you have articulated the detail of what  
 23 you saw about Mr Totton?  
 24 **A. Yes, sir.**  
 25 Q. Did you have any justification for shooting Mr Totton

Page 208

<p>1 based on the circumstances as they presented?</p> <p>2 <b>A. No, sir.</b></p> <p>3 Q. If you had been in a panic, would you have shot him?</p> <p>4 <b>A. Quite possibly.</b></p> <p>5 Q. Yes. And you didn't shoot him?</p> <p>6 <b>A. No.</b></p> <p>7 Q. Finally this. You on 8 March, and indeed from the night</p> <p>8 of the event, had been subject to a process that has</p> <p>9 taken already over five years?</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. The process in the Azelle Rodney shooting and shooting</p> <p>12 based Inquiry took from his death in April 2005 to the</p> <p>13 end of a public Inquiry, it was July 2013. So eight</p> <p>14 years?</p> <p>15 <b>A. Yes, sir.</b></p> <p>16 Q. With an officer then unsuccessfully prosecuted, only</p> <p>17 concluding in July 2015, so 10 years after the event?</p> <p>18 <b>A. Yes, sir.</b></p> <p>19 Q. Did you need welfare support given the nature and scale</p> <p>20 and inquiries into police shootings from the night in</p> <p>21 question?</p> <p>22 <b>A. Yes, sir.</b></p> <p>23 Q. Have you found the support helpful through a five-year</p> <p>24 process?</p> <p>25 <b>A. Most definitely.</b></p> <p style="text-align: center;">Page 209</p>	<p>1 THE CHAIRMAN: Be quiet.</p> <p>2 MS SCHOFIELD: No, I won't be quiet. This is all a farce,</p> <p>3 everybody in this court knows he murdered my son.</p> <p>4 THE CHAIRMAN: Please sit down and be quiet. Thank you.</p> <p>5 MS SCHOFIELD: He's a murderer. What about Anthony's two</p> <p>6 kids?</p> <p>7 THE CHAIRMAN: Mr Beer.</p> <p>8 MS SCHOFIELD: No, I'm not going out.</p> <p>9 No one has helped me for five years. I have had no</p> <p>10 welfare. I have to phone -- I have to phone people</p> <p>11 myself.</p> <p>12 THE CHAIRMAN: Madam, please calm down. I am not going to</p> <p>13 tolerate this sort of interference from anybody.</p> <p>14 I understand it is very difficult.</p> <p>15 MS SCHOFIELD: How difficult -- how do you know how</p> <p>16 difficult it is, judge? Please tell me, have you had</p> <p>17 a son shot?</p> <p>18 THE CHAIRMAN: I don't want to have to have you removed,</p> <p>19 I really don't, but if you carry on you will leave me</p> <p>20 with no option. Now please be quiet.</p> <p>21 Yes, Mr Beer.</p> <p>22 Further questions from MR BEER</p> <p>23 MR BEER: Q9, you fired your gun before you saw a weapon?</p> <p>24 <b>A. Yes, sir.</b></p> <p>25 Q. You fired your gun because you thought that Mr Grainger</p> <p style="text-align: center;">Page 211</p>
<p>1 Q. Has this shooting affected your life?</p> <p>2 <b>A. Most definitely.</b></p> <p>3 Q. In what ways, without disclosing any personal</p> <p>4 information?</p> <p>5 <b>A. It just takes over your life. Think about it first</b></p> <p>6 <b>thing in the morning and then last thing at night.</b></p> <p>7 Q. Yes. Let's be realistic, based on the chairman's</p> <p>8 assessment of the objective evidence he has heard, not</p> <p>9 all of it in open court, you have the protective</p> <p>10 measures you have because of the perceived risk to your</p> <p>11 life if your identity were to be known?</p> <p>12 <b>A. Yes, sir.</b></p> <p>13 Q. Regardless of the merits of your conduct?</p> <p>14 <b>A. Yes, sir.</b></p> <p>15 Q. Something that you live with every day?</p> <p>16 <b>A. Yes, sir.</b></p> <p>17 Q. Had you not judged it necessary to discharge that round,</p> <p>18 would you have done it?</p> <p>19 <b>A. No, sir.</b></p> <p>20 Q. Presented with the same circumstances again and the same</p> <p>21 level of knowledge again, would you have done the same</p> <p>22 thing?</p> <p>23 <b>A. Yes, sir.</b></p> <p>24 MR DAVIES: Thank you.</p> <p>25 MS SCHOFIELD: Murderer, that is what you are.</p> <p style="text-align: center;">Page 210</p>	<p>1 had a weapon?</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. But you fired it because you thought that the risk was</p> <p>4 that he would fire it from a lowered position?</p> <p>5 <b>A. Start firing it from a lowered position, yes, sir.</b></p> <p>6 Q. You fired whilst his hand was in the position that mine</p> <p>7 is now? (Indicates)</p> <p>8 <b>A. Yes, sir.</b></p> <p>9 Q. That is about what you could see?</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. Nothing more than that?</p> <p>12 <b>A. No, sir.</b></p> <p>13 Q. So you thought that he might fire through the engine,</p> <p>14 through the vehicle, through the door?</p> <p>15 <b>A. Laterally across the car, laterally across the car so</b></p> <p>16 <b>either laterally to his left through the passenger</b></p> <p>17 <b>door/passenger window or upward towards the driver's</b></p> <p>18 <b>window.</b></p> <p>19 Q. Therefore the risk would be created when somebody was</p> <p>20 close by?</p> <p>21 <b>A. Yes, sir.</b></p> <p>22 Q. But there was nobody close by?</p> <p>23 <b>A. But the team were approaching.</b></p> <p>24 Q. But there was nobody close by, was there?</p> <p>25 <b>A. The team were approaching. That was their role.</b></p> <p style="text-align: center;">Page 212</p>

1 Q. Was there anybody close by?  
 2 **A. The team were approaching.**  
 3 Q. Was there anyone close by the car?  
 4 **A. Not that I saw.**  
 5 Q. No. If the risk was firing a shot from the position my  
 6 hand is in now, and it has been since I have been asking  
 7 you questions, laterally, and there was nobody there,  
 8 why was there a risk?  
 9 **A. Because the team were approaching.**  
 10 Q. But they weren't there, were they?  
 11 **A. But the team were approaching, sir.**  
 12 Q. That would have been a blind shot by Mr Grainger on your  
 13 account, wouldn't it?  
 14 **A. No, sir.**  
 15 Q. It wouldn't have been aimed?  
 16 **A. Sense of direction shooting.**  
 17 Q. A general sense of direction?  
 18 **A. Yes.**  
 19 Q. But at the point that you fired, it would have been  
 20 either through his colleague Mr Totton, yes?  
 21 **A. No, past his colleague.**  
 22 Q. So what, in the gap between Mr Totton's stomach and the  
 23 dashboard?  
 24 **A. Potentially, yes.**  
 25 Q. Out of the nearside door into thin air. There was

Page 213

1 nobody there, was there?  
 2 **A. But the team were approaching. As I said before, sir.**  
 3 Q. Secondly, can we go to page B/121. You were asked  
 4 questions by Ms Whyte about this. Where you seem to set  
 5 out on a page your rationale for firing your weapon.  
 6 Can you see the IPCC are putting to you you hadn't  
 7 had any intelligence that day to actually indicate that  
 8 he was actually in possession of a firearm.  
 9 **A. Yes.**  
 10 Q. And you say "no", so I think you are agreeing that you  
 11 hadn't, but then you say "but", yes?  
 12 **A. Yes.**  
 13 Q. I want to see the three things that you say:  
 14 "But the whole picture painted from the intelligence  
 15 was that these were three people in a car who were going  
 16 to commit an armed robbery in Culcheth, and my rationale  
 17 is you don't commit an armed robbery without a firearm."  
 18 That is the first thing you effectively say, yes?  
 19 **A. Yes.**  
 20 Q. Would you agree that that in itself -- putting aside  
 21 everything else -- involves an element of supposition,  
 22 namely: that all armed robbers use firearms?  
 23 **A. No, I made that comment because of the intelligence  
 24 picture that was painted during the briefing.**  
 25 Q. That first part of it is itself because of other reasons

Page 214

1 as well?  
 2 **A. The intelligence picture, as stated there --**  
 3 Q. Because on --  
 4 **A. -- the whole picture painted from the intelligence.**  
 5 Q. Because on its own it involves a leap of logic that is  
 6 not necessarily justified, namely all armed robberies  
 7 involve firearms?  
 8 **A. No.**  
 9 Q. The second thing you say is:  
 10 "... and the intelligence that had led up, the  
 11 preparation they had done around Sainsbury's."  
 12 Yes?  
 13 **A. Yes.**  
 14 Q. That, the preparation they had done around Sainsbury's,  
 15 ie recess, yes?  
 16 **A. Yes.**  
 17 Q. Doesn't make it any more or less likely that they may  
 18 use a firearm, does it?  
 19 **A. On that, no.**  
 20 Q. The third thing, you say:  
 21 "The previous intelligence where they had broken  
 22 into the bank in Preston and held people ..."  
 23 Yes?  
 24 **A. Yes.**  
 25 Q. "... I formulated the opinion that, as well as other

Page 215

1 members of the firearms team, that they were going to do  
 2 the strong room at Sainsbury's ..."  
 3 Yes?  
 4 **A. Yes.**  
 5 Q. "... and the only way from my perspective as how you  
 6 break into the strong room at Sainsbury's is by  
 7 threatening somebody with a firearm."  
 8 **A. Is to reinforce the threats with a firearm.**  
 9 Q. Yes, so the third thing that you mention there was that  
 10 you assessed that this was going to be a robbery of  
 11 Sainsbury's?  
 12 **A. Yes.**  
 13 Q. Had you been given any specific intelligence to that  
 14 effect? We have looked at direct contact and foot  
 15 contact slides earlier, if those things happened but had  
 16 you been given any specific intelligence that this was  
 17 to be a robbery of Sainsbury's?  
 18 **A. No.**  
 19 Q. Can we turn lastly then to the training issue. You  
 20 stopped I think the system of having designated jobs  
 21 from May 2010, you have told us?  
 22 **A. Yes.**  
 23 Q. It was replaced by a process of leaving it open as to  
 24 what each member of the team would do?  
 25 **A. Yes.**

Page 216

1 Q. Two questions arising from that.  
 2 Firstly, in the practices and rehearsals that you  
 3 did therefore, were there any standard or normal  
 4 positions that people would go in, even in the absence  
 5 of the designated roles?  
 6 **A. That all depends on the scenario, but, you know, mainly**  
 7 **it would be one vehicle would cover one side, the other**  
 8 **vehicle would cover the other.**  
 9 Q. So even though it was left fluid, when you did training  
 10 exercises and rehearsals that gave some shape to  
 11 strikes?  
 12 **A. It did do, yes.**  
 13 Q. In this case, this was an unconventional strike?  
 14 **A. Yes.**  
 15 Q. Had you practised unconventional strikes before?  
 16 **A. Yes.**  
 17 Q. Were there if not "designated roles" at least expected  
 18 sides of a vehicle that each car would go to in  
 19 an unconventional strike?  
 20 **A. No, it just depended on the layout where the scenario**  
 21 **had been set up. It may well be that it is parked up**  
 22 **against a wall, it may be the centre of a car park. So**  
 23 **potentially two blocking vehicles rather than just one.**  
 24 Q. Therefore, if it is left to the scenario on the day,  
 25 would you agree that that places an added premium on the

Page 217

1 operational firearms commander, even very shortly before  
 2 the strike itself, giving direction as to where people  
 3 are expected to go?  
 4 **A. Potentially.**  
 5 Q. Why only potentially?  
 6 **A. Because at the end of the day he would adapt to the**  
 7 **picture paint that was given, so if he knew that a car**  
 8 **needed blocking in front and back, then that is the sort**  
 9 **of thing --**  
 10 Q. In this case, where a car had been in the same position,  
 11 for the best part of half an hour --  
 12 **A. Yes.**  
 13 Q. -- unmoved --  
 14 **A. Yes.**  
 15 Q. -- would you expect some quite specific direction, at  
 16 least to which side of the car each alpha and bravo set  
 17 of officers would go?  
 18 **A. Yes.**  
 19 Q. In this case, you introduced a, would you agree, new  
 20 variable? Namely you sat in the rear of the vehicle and  
 21 provided cover?  
 22 **A. It was a tactical -- based on tactical -- how can I put**  
 23 **it, awareness and providing tactical cover.**  
 24 Q. Would you agree that within GMP you don't cover vehicles  
 25 from vehicles?

Page 218

1 **A. Sometimes we do.**  
 2 Q. In March 2012, do you agree, that in GMP you didn't  
 3 generally cover vehicles from vehicles?  
 4 **A. Not generally. But if it increased the tactical option**  
 5 **or tactical awareness, then you would do.**  
 6 Q. That was a tactic that you had learnt in the Met, wasn't  
 7 it?  
 8 **A. Yes, sir.**  
 9 Q. I think GMP was the only counter terrorist hub that  
 10 didn't do that; is that right?  
 11 **A. No, I think some of the other hubs worked on the same**  
 12 **platform as we do.**  
 13 Q. If you look at page 150, please of file B.  
 14 **A. Yes.**  
 15 Q. At 800:  
 16 "As the MASTS tactic within GMP, we don't generally  
 17 cover from vehicles, we are the only counter terrorist  
 18 hub that doesn't do that."  
 19 Is that incorrect?  
 20 **A. No, sir.**  
 21 Q. Then over to 152, in the middle of the page you say:  
 22 "We are converting to that tactic, so all the  
 23 counter terrorist hubs can work interoperability  
 24 basically, you can work in and amongst other firearms  
 25 teams and do exactly the same tactic."

Page 219

1 Then you say:  
 2 "We are just playing catch up."  
 3 Yes?  
 4 **A. Yes.**  
 5 Q. Not all of the officers in the alpha, bravo and charlie  
 6 cars were CT officers, were they?  
 7 **A. Say again, sorry?**  
 8 Q. Not all of the officers in alpha, bravo and charlie were  
 9 CTSFOs, were they?  
 10 **A. The OFC, wasn't.**  
 11 Q. He wasn't qualified in the CTSFO tactic having undergone  
 12 successfully the Met training?  
 13 **A. No.**  
 14 MR BEER: Yes, sir. Those are the questions I ask.  
 15 THE CHAIRMAN: Thank you.  
 16 MR BEER: Sir, in terms of the recording of page I think it  
 17 is B/58 or 59, we have not had the opportunity to listen  
 18 to that yet. I don't propose that we hold up Q9 whilst  
 19 that is done.  
 20 THE CHAIRMAN: Can I release him finally or do you want me  
 21 to leave open the possibility that he may have to come  
 22 back and answer further questions?  
 23 MR BEER: I think he can be released finally. We can check  
 24 the tape. I have offered the opportunity to Mr Davies  
 25 to listen to it and he has declined, but we will listen

Page 220

1 to it and tell you from your counsel's perspective what  
2 it says.  
3 THE CHAIRMAN: Thank you. Thank you, Mr Beer.  
4 Q9, that is the end of your evidence now. I can now  
5 release you and you are free to go.  
6 **A. Thank you, sir.**  
7 **(4.50 pm)**  
8 **(The Inquiry adjourned until 10.00 am the following day)**  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Page 221

1  
2  
3 **I N D E X**  
4  
5 Q9 (continued) .....1  
6 Questions from MR BEER (continued) .....1  
7 Questions from MR THOMAS .....116  
8 Questions from MR WEATHERBY .....144  
9 Questions from MR WHYTE .....178  
10 Questions from MR DAVIES .....184  
11 Further questions from MR BEER .....211  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Page 222



A				
<b>A1</b> 151:24 154:5	<b>accounts</b> 2:1 9:9,20 54:19 96:17 119:6 119:13,13 187:23	150:8,17 151:9 159:5 160:2,20 169:23 170:22,24 184:8	167:12,20 173:16 218:16 220:5,8	<b>anybody</b> 147:3 163:19 174:19 211:13 213:1
<b>A2</b> 151:24 154:10	<b>accuracy</b> 186:11	<b>aft</b> 153:20	<b>alternative</b> 123:24 123:25 143:9,9	<b>anyone's</b> 56:16
<b>A3</b> 151:24 154:10	<b>accurate</b> 3:1 20:11 91:22 92:10	<b>afternoon</b> 46:24 116:23 144:12,15 182:25 196:19	<b>Alternatively</b> 102:3	<b>anyway</b> 206:12
<b>ability</b> 184:8	<b>accurately</b> 30:19	<b>agency</b> 19:18	<b>Amber</b> 16:2,6 66:2 172:24 192:17 195:2	<b>apart</b> 132:21 151:23 156:14,15
<b>able</b> 30:12,23,25 62:8 70:17 102:6 105:21 112:22 164:4 166:22 168:22 205:24 206:9	<b>act</b> 185:15	<b>ago</b> 116:11 135:4 165:21	<b>amount</b> 26:25 29:18,21 149:22	<b>apologise</b> 181:17
<b>absence</b> 217:4	<b>acted</b> 185:15	<b>agree</b> 22:17 25:4,7 27:12 73:8 91:24 141:19 142:6 181:9 214:20 217:25 218:19,24 219:2	<b>and/or</b> 195:14	<b>apparent</b> 161:14
<b>absent</b> 37:24	<b>actions</b> 177:11 191:2	<b>agreed</b> 62:22 77:7 148:20 149:23	<b>angle</b> 84:15	<b>Apparently</b> 161:17
<b>absolute</b> 184:23	<b>activated</b> 81:17 85:20 87:6 145:18	<b>agreeing</b> 214:10	<b>Anne</b> 178:12	<b>appear</b> 16:4 87:18
<b>absolutely</b> 136:19	<b>active</b> 145:22	<b>Ah</b> 172:6	<b>announce</b> 70:2	<b>appeared</b> 132:2,9 132:11,23 135:16 181:6 204:21 206:16
<b>accept</b> 135:25 136:2,4 143:24 180:4 195:11	<b>actual</b> 11:17,17 16:7 33:15 52:22 53:1,10,18 123:7 134:12 173:2 185:21 190:21 193:9 207:11	<b>ahead</b> 9:5 178:7	<b>answer</b> 24:22 36:17 40:1 41:13 57:13 57:15 95:2,4 109:4 165:12,15 179:6 198:4,8 207:22 220:22	<b>appearing</b> 31:17,20
<b>access</b> 6:1 7:22 25:5 37:3,19,23 125:8 178:25 181:13 200:25 201:1	<b>adapt</b> 153:2 218:6	<b>aid</b> 113:15	<b>answers</b> 147:24	<b>appears</b> 45:23 135:17
<b>accidental</b> 92:22,25 93:1,2	<b>add</b> 43:1,6 44:8	<b>aim</b> 86:13 110:7,12 131:13 134:21,22 205:23 207:17	<b>Anthony</b> 23:3 100:16 106:22 107:20 125:1,23 126:3 129:18,18 129:22,23 131:2,6 131:8,13,20 132:24 136:16,20 136:25 137:25 138:7,18,21 139:5 139:19 140:18 141:20,23 144:17 145:1 147:6 149:19 156:17 171:11 176:13,20 177:11 197:16 198:1,2,5,8	<b>applicable</b> 169:19
<b>accord</b> 182:16	<b>added</b> 10:10 195:13 217:25	<b>aimed</b> 213:15	<b>approach</b> 14:10 101:16 111:23 147:16,18 148:9 159:5 174:2	<b>apply</b> 57:16 185:8 185:18
<b>account</b> 2:4,18,20 2:21 3:5,6,14,15 3:20 4:2 6:5,16,24 13:3,7 14:5 16:2 17:22 18:3 26:1 45:6 46:15 53:18 53:21 54:9,15 91:21,22 92:15 93:9 95:15,24 96:14,24 101:5 115:16 146:8 147:6 165:20 167:19 173:9 175:3 176:7 177:2 188:1,5,16,20 189:2,6,8,15,17 189:21 195:13 197:2 206:2 213:13	<b>address</b> 11:20	<b>aiming</b> 85:23 86:21 87:5 96:11 99:23 203:14	<b>approaching</b> 100:20 103:8,18 110:8 158:21 162:8 172:10,24 205:20,23 207:12 207:12,17 208:2 208:16 212:23,25 213:2,9,11 214:2	<b>appropriate</b> 6:19 6:23 7:13 72:7 116:8,9
	<b>adjoined</b> 221:8	<b>Aimpoint</b> 86:16	<b>Anthony's</b> 116:24 130:1,8 131:7,10 131:16 137:8 211:5	<b>approximately</b> 12:10 13:9 85:3 90:4 188:4,7
	<b>adjourned</b> 1:17 57:4 116:18 168:9	<b>air</b> 213:25	<b>anticipated</b> 32:25 45:17	<b>April</b> 1:1 40:8 190:1 209:12
	<b>adjusted</b> 78:23	<b>align</b> 68:18 80:12 158:16 159:5		<b>arc</b> 78:8 140:8 162:7,9,15,24,25 207:5 208:8
	<b>admitting</b> 18:2	<b>alighted</b> 77:5		
	<b>adopt</b> 67:16 79:10	<b>align</b> 86:12		
	<b>adopted</b> 68:1 79:1	<b>allow</b> 77:12 79:11 171:1		
	<b>advantage</b> 172:7,7	<b>allowed</b> 71:5		
	<b>advantages</b> 74:1,6 74:18	<b>alongside</b> 137:16		
	<b>advised</b> 57:10	<b>alpha</b> 62:16 66:13 67:25 80:10 81:15 81:24 104:25 113:18 123:8 145:2 157:16		
	<b>affect</b> 80:8 198:14 199:14			
	<b>affirmed</b> 13:25			
	<b>AFO</b> 37:8 184:11 185:9,15,24			
	<b>AFOs</b> 19:1 60:25 61:23 62:10 114:24 115:7			

<b>arcade</b> 192:3	<b>articulated</b> 208:22	<b>associated</b> 142:1	125:10,12	126:25 136:17,21
<b>area</b> 15:10 32:19	<b>ascertain</b> 65:14,21	<b>Association</b> 4:5	<b>avenue</b> 63:22 66:18	136:23 140:1
33:1,8 45:18	<b>ascertained</b> 66:1	122:1	83:9,12,12	141:25 153:24
48:24 71:11 87:14	<b>aside</b> 214:20	<b>assume</b> 9:14 25:12	<b>avoid</b> 137:11	154:24 167:7,10
91:10,14,16,17,19	<b>asked</b> 24:21 35:5	41:2,4,10,20	<b>aware</b> 6:17 34:8	178:19 181:4
91:20 92:16,16	57:12 68:11,20,24	49:18,19 71:4	64:17 72:10	189:24 195:22
93:11 101:11	69:4 98:14 104:4	192:22	117:15 126:15,19	205:5,17 206:3,5
192:5 193:23	107:17 110:3	<b>assumed</b> 37:23	127:14 142:18	206:6,14,18 207:6
194:2 202:23	116:4 125:19	<b>assuming</b> 9:17 69:7	160:8,22 174:19	207:14 208:8,12
204:5	140:24 165:19	80:24,25 81:1	176:2 191:11	208:13,15 218:8
<b>argue</b> 206:19	179:5,16 181:17	134:21	<b>awareness</b> 218:23	220:22
<b>arising</b> 191:16	182:2 184:4 185:3	<b>assumption</b> 33:16	219:5	<b>backed</b> 39:2
217:1	187:22 195:8,11	41:9 45:1	<b>awe</b> 147:18 148:10	<b>background</b> 38:4
<b>arm's</b> 207:3	197:23 198:8	<b>attached</b> 87:7	<b>axe</b> 24:15	148:6
<b>armed</b> 22:14,17	199:20 205:3	186:2	<b>Azelle</b> 121:18,21,24	<b>ballistic</b> 74:14,16
23:8,22 24:6,9,11	206:17 207:20	<b>attempt</b> 170:24	209:11	75:8,10
24:20 25:1,8,17	214:3	<b>attempts</b> 65:13		<b>ballistics</b> 133:8
25:21,23 26:2,7,8	<b>asking</b> 119:12	<b>attend</b> 49:10	<b>B</b>	<b>bank</b> 23:1 26:20
36:7,8 37:2 38:3	120:11 132:10	117:21	<b>B</b> 19:7 21:22 68:9	28:25 29:3 31:9
42:20,20,21,23	144:13 168:21	<b>attendance</b> 118:2	179:9 219:13	43:16,17 46:22
43:4,5,7 46:21	213:6	<b>attended</b> 18:18	<b>B/108</b> 97:5	47:5 49:2,24
48:23 49:2 54:1	<b>asks</b> 19:9 94:20	51:11	<b>B/109</b> 94:14	50:24 51:23 52:2
54:10 58:3 89:8,9	<b>assault</b> 39:24	<b>attending</b> 46:23	<b>B/121</b> 179:7 214:3	180:16 190:20
89:10,16 129:7	<b>assess</b> 156:21	<b>attention</b> 111:14	<b>B/122</b> 98:13	196:19 215:22
163:6 176:11	158:21	<b>Audi</b> 12:21 59:23	<b>B/31</b> 19:7	<b>banks</b> 7:25 193:3
179:24,25 190:19	<b>assessed</b> 37:9 74:22	60:5,7 61:1,13	<b>B/39</b> 35:2 40:6,9	<b>bark</b> 207:5
190:23,24 191:2,8	169:12 170:19	63:4,21 66:23	<b>B/48</b> 36:10	<b>barrier</b> 203:20
192:18 199:12	181:12 216:10	68:4,8 70:1 82:13	<b>B/57</b> 104:3	<b>base</b> 114:25
200:22 202:12,14	<b>assessing</b> 50:16	82:14,22,25 103:2	<b>B/58</b> 107:16 220:17	<b>baseball</b> 24:16
214:16,17,22	181:12 205:19	104:6,13,13 108:9	<b>B/78</b> 52:5	78:20
215:6	<b>assessment</b> 36:25	113:3,21 124:10	<b>B/79</b> 52:18	<b>based</b> 38:19 39:4,9
<b>armed'</b> 24:16	38:10 40:12,13	126:4 127:15	<b>B/91</b> 61:8	39:10 42:14
<b>armoured</b> 74:16	47:8 49:6,10,16	134:7 142:16,17	<b>B1</b> 151:24 154:10	134:14 147:12,14
<b>arms</b> 135:12 176:2	49:21,25 50:6,9	201:6	<b>B2</b> 151:24 154:10	147:18 148:16
<b>arranged</b> 4:25	51:12 58:15,17	<b>Audi's</b> 113:8	156:4	190:15 191:9
<b>arrangement</b> 8:25	88:24 143:25	<b>audio</b> 9:21	<b>B3</b> 151:24 154:11	209:1,12 210:7
<b>arrest</b> 41:16 176:1	157:3 180:23	<b>authorisations</b>	<b>back</b> 3:8 9:5 23:14	218:22
<b>arrested</b> 170:2	190:14,16,17	156:11	24:4 26:12 33:7	<b>basic</b> 156:19
171:5	191:12 200:18	<b>authorised</b> 151:12	38:13 51:22 61:21	<b>basically</b> 5:3,9,22
<b>arrests</b> 38:21	206:7 210:8	184:16	68:23 79:2 83:15	7:5 17:14 68:4,7
<b>arrival</b> 26:21 29:9	<b>assessments</b> 185:12	<b>authority</b> 4:2 196:9	94:24 98:7,10	69:24 85:20 86:18
123:7 196:14	185:13	<b>automatic</b> 84:19	103:5 106:8,9	88:23 96:21 98:22
201:17	<b>assessor</b> 49:8	<b>autopsy</b> 134:15	107:7 113:3,18	106:21,23 110:15
<b>arrive</b> 26:21 29:4	<b>assets</b> 76:9	<b>autumn</b> 120:22	114:2,25 119:7	113:5 114:14
<b>arrived</b> 29:6 56:10	<b>assist</b> 122:13	<b>available</b> 109:23	120:16 126:18,20	118:14,23 119:10

120:11 122:5	176:10 192:10	80:15,21 123:18	49:15 50:20,23	<b>called</b> 4:15 6:2 7:12
141:4 151:14	200:5	146:24 151:10	181:11 190:10	10:21 68:13 71:6
152:7,12 153:2	<b>bell</b> 4:20	156:3 157:16	<b>briefly</b> 168:1	76:11 78:17,20
155:7 158:16	<b>belt</b> 90:7	167:20,22,23	172:23 182:19	86:6,8 129:13
162:16 174:8	<b>bench</b> 11:23	173:16 218:16	<b>bright</b> 163:25	200:18
219:24	<b>beneficial</b> 78:6	220:5,8	<b>bring</b> 84:10,17,23	<b>calling</b> 10:20
<b>basis</b> 5:4 9:2 10:21	<b>benign</b> 186:21	<b>break</b> 56:22,23	208:9	<b>calls</b> 129:12
14:13 19:2 33:4	<b>bespoke</b> 154:16,17	112:3,4 115:20	<b>broad</b> 3:13	<b>calm</b> 211:12
36:22 42:19 46:14	<b>best</b> 67:12 71:13,14	129:21 137:21	<b>broadcast</b> 65:10	<b>canister</b> 79:23,24
63:11 203:23	71:16 72:22 174:6	168:6 171:4 216:6	66:5,23 80:17,21	107:18 108:10
<b>bat</b> 24:16	218:11	<b>breaking</b> 109:14	88:14 126:9	112:7 130:14
<b>bay</b> 66:17	<b>better</b> 78:2 110:8	137:24 143:11	<b>broadside</b> 173:20	131:4 137:7,9,9
<b>beam</b> 88:6	136:1,5	<b>brief</b> 106:17	174:1,9	137:15 142:24,25
<b>bear</b> 108:5 143:23	<b>beyond</b> 199:21	<b>briefed</b> 31:5 45:7	<b>broke</b> 26:20 28:25	143:2,2,12,16
<b>Bearing</b> 200:5	<b>bit</b> 21:7 22:7 70:9	58:14 63:8 192:25	29:3	151:11
<b>Beer</b> 1:4,5,23,24	143:21 149:6	199:7	<b>broken</b> 180:16	<b>cap</b> 78:20 163:10
40:8 47:15 56:21	183:2	<b>briefing</b> 10:12	215:21	163:20 164:4
57:6,9,20,24	<b>bizarre</b> 109:13	11:17 12:10,12	<b>brought</b> 52:10 89:6	<b>capabilities</b> 23:2,12
76:10 108:13,15	<b>blind</b> 100:22	18:19,22 19:23	204:9	<b>capability</b> 22:22
109:5,17 115:18	213:12	20:25 21:9,19	<b>building</b> 83:14	37:14,16 38:16
116:10 119:14	<b>block</b> 174:8	23:7,11,12 24:19	105:8 187:18	43:13,14,19,25
122:22 124:6	<b>blocked</b> 112:23	24:21 25:16 26:3	<b>bullet</b> 134:13	181:13 191:5,12
138:21 144:24	142:17	26:11 27:16,18,21	138:19 159:4	200:6
191:6 195:12	<b>blocking</b> 127:22	27:25 28:18 29:2	<b>bundle</b> 2:2 19:6,7	<b>capable</b> 202:24
211:7,21,22,23	217:23 218:8	29:8,14,19 30:1	21:22,23 25:14	<b>capacity</b> 204:7
220:14,16,23	<b>Blythe</b> 195:8	30:14 31:17,20	26:12 32:12,23	<b>capitulating</b> 137:8
221:3 222:6,11	196:22 197:20	32:16,19 33:17	45:4 46:18 47:18	137:18
<b>beginning</b> 43:2,3	<b>bodies</b> 74:9 89:23	34:22 35:11,25	58:23 68:9 71:21	<b>car</b> 57:8 59:6 62:14
<b>begins</b> 27:15 31:12	<b>body</b> 9:1 79:11	36:16,20 37:4,5	91:5,6 95:25	62:16 63:12,21
<b>behalf</b> 144:13	99:18 125:17	37:12,14,17 39:12	102:9,10 133:6	64:1,1,23 65:6,17
178:12	131:24 132:4,4,20	39:13 41:1,2 42:9	149:8 168:18	66:6,7,10,13,16
<b>belief</b> 43:10	133:3 203:2 206:3	43:2,3 44:20	179:8 182:6,8,10	66:22 67:1,3
<b>beliefs</b> 55:19	<b>Bolton</b> 46:9,22 47:6	45:25 46:14,16,17	191:15,17 195:24	68:23 70:1,24,25
<b>believe</b> 34:1 36:7	48:12 49:2,24	47:23 48:2,7,11	<b>bungee</b> 85:11	72:25 73:12,19
49:5 58:9 60:9	51:9,24 52:2 53:9	50:19 51:19,23	<b>Burke</b> 4:20 6:11	74:23 76:19 78:5
64:5 68:2 70:2	54:2 196:19	54:13,24 58:1	<b>bush</b> 55:7,9 194:6,8	80:11,21 81:2,14
80:12 81:25	<b>bonnet</b> 161:23	61:4,15,18 71:24	<b>button</b> 81:12 84:20	81:21 83:9,11
125:13,25 140:9	<b>bottom</b> 12:18 15:3	73:7 79:14 178:19	88:2	88:12 103:4 110:6
141:2 177:20	32:15 48:9 58:24	181:10 187:15		110:14,19 111:1
207:3	63:2 67:6 68:10	190:8,18 191:8,17	<b>C</b>	111:11 123:8,8,12
<b>believed</b> 22:13,20	97:6 191:21	192:9,24 193:10	<b>cab</b> 109:11 112:8	123:18,18 131:25
24:25 32:20 38:2	197:23	193:21,22 195:4	<b>calibre</b> 204:1,3	138:16 142:1,9
41:23 43:3 45:12	<b>box</b> 19:16	196:13 214:24	<b>call</b> 4:14 5:16	145:2,11,11,13
61:20 99:6 101:4	<b>Branch</b> 8:17	<b>briefings</b> 19:1	118:12 129:6	146:17,18,21,24
138:22 175:21,24	<b>bravo</b> 66:13 77:16	21:10,13 47:9,16	152:24 183:20	147:7,8 148:21

153:15,21 156:3 156:25 157:16,17 158:17,18 160:25 162:12,16,18,25 165:17 167:7,10 167:11,12,16 172:19,25 173:12 173:21,24 174:10 174:15 175:12 177:15 179:23 181:7,19 184:25 184:25 194:1 199:22,25 200:9 207:16,23 208:9 208:11,12,12,17 212:15,15 213:3 214:15 217:18,22 218:7,10,16 <b>card</b> 114:13 <b>care</b> 113:15 <b>career</b> 188:23 <b>careful</b> 134:4,11 143:25 <b>carefully</b> 20:9 57:22 <b>carry</b> 19:22 58:6 115:4 122:9 211:19 <b>carrying</b> 176:2 <b>cars</b> 68:17 69:20,24 70:3 77:17 148:16 155:22 158:16 160:2,20 161:15 162:4 183:15,15 183:16 220:6 <b>case</b> 20:7,9,15 21:21 22:5 70:17 72:8 157:19,22 160:1 217:13 218:10,19 <b>cases</b> 116:8 <b>cash</b> 29:18 33:21 192:23 <b>cash-rich</b> 33:8,12 33:18	<b>catalogue</b> 154:15 <b>catch</b> 2:22 220:2 <b>caused</b> 60:8 142:22 143:11 <b>causes</b> 131:6 143:2 143:3 <b>cent</b> 187:12,13 <b>centimetre</b> 87:12 87:12 <b>centre</b> 32:8 66:14 96:11 217:22 <b>centres</b> 86:12 <b>certain</b> 75:15 <b>certainly</b> 75:16 77:19 161:9 173:8 <b>certainty</b> 101:9 <b>cetera</b> 151:24 <b>chairman</b> 1:3,6,19 1:21 47:12,14 56:23 57:6,10,19 57:21 76:7 108:22 109:15 115:19,25 116:15,20 122:8 122:12 123:5 128:1 130:14 137:5,13 144:8 168:2,5,13 178:6 178:9 204:6 211:1 211:4,7,12,18 220:15,20 221:3 <b>chairman's</b> 210:7 <b>challenge</b> 74:24 75:1,3,4 89:8,9,17 116:8 146:5,6 169:25 170:23,24 171:16,24 172:15 <b>challenged</b> 146:1,8 146:11 147:2 <b>challenges</b> 164:25 <b>challenging</b> 164:8 165:3,7 <b>chance</b> 165:13 <b>change</b> 58:17 150:16 155:8,11 157:8 172:14	<b>changed</b> 150:22 151:25 <b>channel</b> 123:16,23 124:16,22 <b>charge</b> 41:17 <b>charitable</b> 118:18 <b>charlie</b> 66:13 77:16 123:18 146:25 151:10 167:20,22 220:5,8 <b>chart</b> 10:3,6 11:5 11:15,19,24 12:5 12:9,13,25 13:2 13:25 14:1,13 15:1,6,14 16:25 17:7,11,15,24 60:1 122:20 <b>chatter</b> 46:15 <b>check</b> 2:23 9:4 109:23 220:23 <b>checked</b> 9:15,17 92:8 109:15 <b>chest</b> 89:24,25 165:25 <b>chief</b> 8:14 114:9 <b>choose</b> 202:24 <b>circumstances</b> 1:25 3:20 4:24 105:6,7 105:20 144:1 209:1 210:20 <b>clarified</b> 16:20 109:3 123:5 <b>clarify</b> 19:10 109:8 124:9 144:16 <b>clarity</b> 124:2 <b>Clark</b> 125:22 <b>Claytonbrook</b> 115:5,7,9 <b>clear</b> 59:4 116:5 123:10 132:25 136:19,25 144:20 146:19 148:1 155:17 170:5 203:7 <b>clearly</b> 176:24	<b>close</b> 55:23 72:8,19 75:4 76:3 82:13 140:11 148:21 212:20,22,24 213:1,3 <b>closed</b> 159:7,13 <b>closely</b> 29:24 <b>closer</b> 35:1 138:4 <b>closest</b> 139:15,21 140:14 <b>clothing</b> 59:14 <b>club</b> 122:6 <b>coaster</b> 120:14 <b>colleague</b> 16:21 213:20,21 <b>colleagues</b> 16:19 17:1,3,22 103:2 141:11 149:3 199:23 <b>collect</b> 115:23 <b>collectively</b> 7:14,16 <b>come</b> 5:5 7:21 8:6 19:15 36:22 37:16 49:6 52:7 57:1 62:23 79:22 84:18 95:6,16 115:22 119:7,9 123:6 133:10,10 137:4,8 137:17,22 138:2 145:1 147:24 152:18 154:23 159:7 161:20,22 189:24 192:15 193:13,25 207:4 220:21 <b>comes</b> 19:17 145:11 197:21 199:4 <b>coming</b> 64:22 76:21 94:6,11 95:19 97:22 110:19 113:20 164:9,22 168:13 <b>comma</b> 206:19 <b>command</b> 8:8 58:9 90:19 98:16,22,25	129:6,12,13 139:9 176:24 177:8 181:19 185:19 204:22 <b>commander</b> 8:6 73:15 154:6 156:14 157:13 218:1 <b>commander's</b> 174:5 <b>commanders</b> 64:25 <b>commence</b> 114:5 <b>commenced</b> 27:25 <b>comment</b> 214:23 <b>commented</b> 116:1 <b>comments</b> 161:2 <b>commercial</b> 193:6 <b>commit</b> 38:3 42:20 42:21,23 43:5 44:14 179:24,25 199:12 200:22 202:12,14 214:16 214:17 <b>commitments</b> 186:14 <b>committed</b> 52:22 53:1,10,18 57:14 180:5,8 <b>committing</b> 43:9 65:6 <b>common</b> 80:3,5 174:22,24 <b>comms</b> 69:19,23,24 70:13 80:22 <b>communicate</b> 98:15 <b>communicated</b> 77:16,22 123:14 199:6 <b>communicating</b> 123:21 <b>communication</b> 77:19 <b>compare</b> 28:12 <b>competence</b> 184:17
---	---	---	---	--

<b>competing</b> 164:25	123:2	169:11,24 170:5	<b>convey</b> 109:2	<b>countersign</b> 2:23
<b>compiled</b> 28:1	<b>conferring</b> 7:8,9	170:10,12,21	<b>convicted</b> 38:22	<b>couple</b> 1:12 14:25
<b>complete</b> 11:11	18:2 114:7,8,17	172:16	39:19 40:3,15,18	181:16 191:16
<b>completed</b> 10:8,10	117:11 122:24	<b>contained</b> 171:18	40:25 41:3,4,5,10	<b>course</b> 6:4 7:11
<b>completely</b> 37:12	123:4	171:24 172:19	42:3 44:4 53:2,3,4	21:16 34:22 46:6
100:6 151:5,6	<b>confirm</b> 35:1	<b>containment</b>	53:11,15,19	48:11 50:19 51:19
172:1 178:11	<b>conformity</b> 183:6	147:20 148:10	<b>convicted'</b> 52:23	54:23 57:25 60:17
199:14	<b>confusing</b> 179:14	172:17	<b>conviction</b> 31:8	60:18 61:14 117:6
<b>completes</b> 197:8	<b>confusion</b> 152:2	<b>content</b> 16:7 21:15	39:2,10,16 41:20	147:23 148:13,23
<b>compliant</b> 170:7	<b>conjunction</b> 134:16	153:8	41:21,24 42:8,10	151:20 153:4,7,24
<b>complicated</b> 183:3	<b>connected</b> 1:7	<b>context</b> 22:20,21	42:14	153:25 154:20,23
<b>complied</b> 98:25	<b>consequence</b> 1:13	24:18 68:11 94:20	<b>convictions</b> 38:21	154:24 156:21
<b>comply</b> 202:2	<b>consider</b> 71:12	102:11 149:12	<b>convoy</b> 183:20	162:1 178:9
<b>compound</b> 194:3	121:10	190:25 196:17	194:15	182:11,14,22
<b>computers</b> 7:23 8:1	<b>consideration</b>	198:18,20,23	<b>copied</b> 15:21 28:7	188:20 189:8
<b>concentrate</b> 105:24	17:18	202:8 206:18	169:6	196:21 201:20
190:8	<b>considered</b> 185:8	<b>contexts</b> 187:24	<b>copy</b> 11:23 22:1	<b>court</b> 39:2 210:9
<b>concentrated</b> 107:7	<b>considering</b> 149:16	<b>contingency</b> 192:13	30:20 31:1 193:24	211:3
<b>concentrating</b> 16:7	168:25	<b>continue</b> 192:24	<b>cordon</b> 113:19,23	<b>courtesy</b> 83:5
103:3 105:18	<b>consist</b> 5:25	<b>continued</b> 1:20,23	<b>corner</b> 179:10	<b>cover</b> 62:25 67:13
149:2 205:12	<b>consistent</b> 134:3	202:2 204:24	191:21 200:9	67:21 74:25 75:7
<b>concentration</b>	135:9 194:22	205:25 222:5,6	<b>correct</b> 91:22 95:18	75:8,10 77:16
105:20	200:15	<b>continues</b> 28:24	117:8,11,16,19	78:10 80:16
<b>concern</b> 64:15,16	<b>consistently</b> 187:2	29:11,17 57:15	120:1 121:15	103:20,25 107:22
<b>concerned</b> 6:9,13	<b>conspiracy</b> 38:2	197:2	123:12 124:19	108:1,7 109:6,10
117:4 120:25	42:23 43:5 199:12	<b>continuous</b> 87:10	126:14 127:9,23	109:19 110:11
122:5 138:6	<b>conspired</b> 44:13	<b>contrary</b> 25:11	127:24 128:21	112:12 139:8
150:18	<b>conspiring</b> 42:20	107:24	132:8,22 138:4	141:4 145:6,20
<b>concerns</b> 119:15	42:21	<b>control</b> 74:3 75:15	141:6,9,14,21	146:5,6 158:3
<b>concluded</b> 12:12	<b>constantly</b> 186:8	75:16,17 78:1	143:4 147:13	160:3,6,20 161:7
<b>concluding</b> 209:17	<b>constructed</b> 19:2	<b>controlled</b> 71:17	150:18,19 196:12	161:20,22 163:2
<b>conclusions</b> 134:1	<b>consult</b> 17:3,6,8	<b>convenient</b> 56:21	207:18	167:20,21,22,22
134:18	<b>consultation</b> 8:7,23	168:4,5	<b>corrected</b> 150:15	167:23 172:9
<b>concrete</b> 148:2	<b>consulted</b> 8:24	<b>conventional</b>	174:18	173:19 200:2
<b>condition</b> 68:16	17:21 185:17	150:24 152:3	<b>correctly</b> 132:20	201:4,16,22 202:1
<b>conditional</b> 45:20	<b>consulting</b> 17:1,23	153:12,14,16,19	<b>correlated</b> 29:24	205:17 206:1
<b>conditions</b> 83:18	<b>contact</b> 79:22 85:10	156:19 157:23	<b>corroborate</b> 20:17	217:7,8 218:21,23
159:11	105:8,9,10 142:15	158:2 183:5	20:20	218:24 219:3,17
<b>conduct</b> 72:12 73:3	192:13 193:13,25	<b>conversation</b> 49:18	<b>counsel</b> 57:11	<b>covered</b> 68:22
202:19 210:13	194:24 216:14,15	49:20,22 51:22	108:19,22,24	78:14 96:3 100:6
<b>conducting</b> 32:7	<b>contacted</b> 113:21	54:5 68:22 115:3	116:2,6	102:4 107:4
<b>confer</b> 114:18,19	<b>contacting</b> 105:11	<b>conversion</b> 154:20	<b>counsel's</b> 221:1	135:24 146:12
122:19,19	105:12	154:24 159:21	<b>counselling</b> 6:2	156:19 158:22
<b>conferral</b> 28:9	<b>contain</b> 147:22	182:11,14,17	<b>counter</b> 155:3,5	187:8 191:21
<b>conferred</b> 122:17	148:24 158:14	<b>converting</b> 219:22	219:9,17,23	198:17

<b>covering</b> 78:5 102:7 105:25,25 106:22 108:8 109:11 111:12 127:2 129:11 135:25 140:7,17 140:18 147:3,4 165:3 175:12 177:23	32:4 37:1,2,18 99:13 150:10 <b>curtain</b> 57:20,22 168:11 <b>cut</b> 34:6	<b>DC</b> 125:22 126:3 <b>dead</b> 94:10 <b>deal</b> 110:9 151:20 205:25 <b>dealing</b> 158:4 <b>dealt</b> 2:12 110:5 129:1 140:5 207:11,15 208:1,2 208:17,19 <b>death</b> 3:11 24:1 209:12 <b>December</b> 51:5,6 51:15,17 152:18 <b>decide</b> 174:7 <b>decided</b> 68:3,7 173:9 175:10 <b>decision</b> 27:22 55:16 77:12 79:12 173:19 186:18 <b>decisions</b> 120:17 141:17 <b>declaration</b> 105:4 <b>declare</b> 105:14 <b>declared</b> 12:22 60:8 66:2 <b>declined</b> 220:25 <b>deemed</b> 7:23 94:11 96:21 169:14 172:9 <b>default</b> 155:12 157:5 <b>defibrillator</b> 113:11 <b>definitely</b> 35:18 209:25 210:2 <b>defunct</b> 155:13,14 <b>degree</b> 148:5 172:5 <b>degrees</b> 84:16 <b>delay</b> 3:13,15 77:12 <b>delegation</b> 4:19 <b>deliberate</b> 91:3 92:18,19,21,23,24 93:3,11 96:4 97:10 101:10 110:1 166:3 203:4	<b>delicate</b> 122:9 <b>deliver</b> 208:15 <b>delivered</b> 35:10 <b>delivery</b> 21:15 <b>delta</b> 77:17 113:24 113:24 <b>demands</b> 170:6 <b>demonstrated</b> 184:17 <b>department</b> 19:3 19:10,21 20:23 51:3 <b>depended</b> 152:7 217:20 <b>dependent</b> 152:10 <b>depending</b> 20:20 75:12 187:19 <b>depends</b> 217:6 <b>depicted</b> 151:4 <b>deploy</b> 67:8,19 69:9 69:10,18 72:9,11 73:3 155:25 169:23 170:10 171:23 173:6 183:11 <b>deployed</b> 13:10 46:4 50:15,17,18 51:14 61:15 69:5 80:7 107:18 108:10 145:11 146:15,16 151:9 170:9 184:25 190:14 <b>deploying</b> 102:13 102:17 104:5,9,10 146:20 148:16 170:22 183:18 187:4 <b>deployment</b> 21:11 34:11 60:23 69:1 105:9 145:25 149:15 150:4 151:15,23 167:12 178:20 184:6 187:6,18,19	188:10,17 194:14 <b>deployments</b> 60:18 150:25 187:9 <b>depressing</b> 100:4 <b>describe</b> 27:10 67:11 78:25 86:4 88:1 94:8 96:14 96:19,23 109:14 118:13 145:10 <b>described</b> 65:9 92:6 94:12 124:6 145:6 180:20 206:2 <b>describing</b> 90:2 93:19,20,22 94:3 94:4 108:7 <b>description</b> 66:15 66:23 93:15 <b>designated</b> 216:20 217:5,17 <b>designed</b> 184:20 <b>detail</b> 11:17 71:15 185:11 208:22 <b>detailed</b> 183:3 <b>details</b> 11:16 14:25 16:22 20:1 <b>detain</b> 148:24 158:14 170:8,15 170:20 171:11 <b>determine</b> 166:2 <b>determined</b> 154:12 157:14 173:18 174:11 <b>devastated</b> 189:7 <b>develop</b> 20:14 44:24 156:20 <b>developed</b> 76:18 <b>device</b> 87:5 96:11 <b>diagonal</b> 84:15 <b>diagrams</b> 155:23 157:6 169:4 <b>differ</b> 21:10 <b>difference</b> 39:1 88:21,22 92:21,24 109:1 146:4 <b>different</b> 34:5 38:8
	<b>D</b>			
<b>covert</b> 76:10 147:16 148:9 169:14 170:18 <b>crawl</b> 110:15 <b>crawling</b> 106:24 <b>create</b> 19:22 20:23 <b>created</b> 2:1 18:22 152:2 212:19 <b>crime</b> 49:22 52:12 52:13 53:5,13,15 <b>crimes</b> 44:3,4 <b>Crimewatch</b> 198:21 <b>criminal</b> 57:14 <b>critical</b> 37:8 <b>cross</b> 17:25 <b>crude</b> 187:10 <b>crystal</b> 136:19 <b>CS</b> 79:22,23 107:18 108:9 112:7,8 130:14,19 143:2,4 143:12 183:12 <b>CSDC</b> 80:7 <b>CT</b> 155:1,4 160:18 220:6 <b>CTSFO</b> 160:5 220:11 <b>CTSFOs</b> 220:9 <b>Culcheth</b> 12:22 15:10 32:8,21 33:1 34:20 45:18 58:10 66:14 71:11 72:17,20 126:4 179:24 214:16 <b>Culminating</b> 197:5 <b>current</b> 25:4,7 32:1	<b>D</b> 222:3 <b>danger</b> 99:12 103:9 175:21,24 205:13 <b>dangerous</b> 25:18 <b>dangerousness</b> 44:11 <b>dark</b> 59:3 83:8,10 <b>dashboard</b> 89:21 89:22 95:23 97:8 166:14 167:5 205:17 213:23 <b>date</b> 34:9 40:7 190:15 <b>dated</b> 3:9 182:14 <b>David</b> 100:18 106:14 <b>Davies</b> 40:7 108:12 108:14,17 116:1 116:14 178:6,7 184:1,2 204:7 210:24 220:24 222:10 <b>day</b> 2:1 5:10 7:17 34:5,12 35:6,15 36:14 44:18,21 45:2 47:12 54:4 56:3 57:7,25 60:17 71:24 73:17 73:21 76:15 117:21 148:23 169:19 179:17 188:11,16 190:17 192:22 197:13 210:15 214:7 217:24 218:6 221:8 <b>days</b> 3:11,16 30:12 117:18 175:5			

39:8 61:14 102:11 134:14 153:8 155:16 167:16 183:18,19 186:16 187:24 <b>differentiate</b> 166:13 <b>differently</b> 191:7 <b>difficult</b> 71:10 72:16 74:3 108:23 211:14,15,16 <b>difficulty</b> 57:23 <b>diffuse</b> 88:6,8 <b>diffusion</b> 6:1 <b>direct</b> 170:1 189:9 192:13 193:13,24 194:21,24 216:14 <b>directed</b> 44:22 189:8 195:22 <b>direction</b> 91:18 92:17 100:21 104:8 166:4,13,21 178:3 213:16,17 218:2,15 <b>directly</b> 129:20 145:12 161:19 165:7 169:19 188:21 <b>disadvantages</b> 75:14,18 <b>disagree</b> 73:14,16 <b>disagreement</b> 77:3 77:7 <b>disappearing</b> 107:8 111:21 139:25 <b>discharge</b> 99:3,6 141:5 142:22 186:6 203:11 206:9 210:17 <b>discharged</b> 23:25 46:11 47:11 48:24 52:3 54:2 93:13 93:25 94:1,21 133:12 138:10 204:2	<b>discharging</b> 97:23 206:8 <b>disciplined</b> 176:1 <b>disclosed</b> 17:24 <b>disclosing</b> 210:3 <b>discuss</b> 121:8 <b>discussed</b> 7:2 36:13 46:24 52:8,20 61:8,11 62:10 68:21,25 118:17 118:22 119:3,4,5 119:8 123:11 164:7 199:22 <b>discussing</b> 50:9 119:18 120:8 169:10 171:10 <b>discussion</b> 5:17,18 6:4 7:1,8,11 46:7 50:4 51:25 53:6 61:17,19,23 67:25 69:9,17 70:5,12 70:15,21 71:4 73:17,21 76:14 80:19 119:25 120:3 175:1 182:23 196:18,21 198:9,13,20,23 <b>discussions</b> 121:3,6 121:17,20,23 <b>disobeying</b> 111:5,9 <b>dispersal</b> 79:23,23 112:7 143:12 <b>display</b> 87:8 <b>displayed</b> 22:1 153:8 <b>dispute</b> 152:16 <b>disregarded</b> 140:14 <b>dissipate</b> 204:13 <b>distance</b> 74:24 75:1 75:3,5 130:17,23 <b>distinction</b> 42:10 <b>distinguish</b> 39:9,11 39:14 <b>distracted</b> 164:15 164:16	<b>division</b> 44:6 185:20 <b>document</b> 28:6 159:1 168:24 <b>documents</b> 168:23 169:7 <b>doing</b> 18:2 43:7 94:10 105:18 106:12 107:5 145:22 148:20,23 152:23 154:3,22 161:16 164:23 176:14 186:16 187:9 207:6 <b>domination</b> 171:1 <b>door</b> 85:16,16 100:20 107:1,11 111:21 112:21,24 127:15,20 129:12 129:24 133:1,2,3 133:4 136:11 142:2,4 158:3,20 158:22,22 159:5,6 159:7 171:4 178:1 202:25 203:2 212:14 213:25 <b>door/passenger</b> 212:17 <b>doors</b> 104:12 159:12 170:25 171:2 <b>dot</b> 86:19,19,21 87:14 <b>dots</b> 38:1,5,7 <b>doubt</b> 64:15 101:6 149:18 <b>Dr</b> 133:9 <b>drawn</b> 42:11 <b>drive</b> 65:17,20 155:6,7 <b>driven</b> 151:13 <b>driver</b> 69:7 82:3 88:12,15 91:9 93:10 96:3,12 97:7,9 103:20	104:1,11 112:10 124:14 125:1,10 126:3,22 129:18 148:17 150:7 154:8,8 155:9 156:14 157:13 174:6 201:10,24 205:18 206:1 <b>driver's</b> 80:13 100:20 125:23 127:15,20 129:12 129:24 132:7 133:1,2,3,4 162:13,23 174:21 177:16 212:17 <b>drivers</b> 125:16 150:17 155:5 <b>driving</b> 55:8,11 59:8 82:10,14 123:12 150:3 154:25 194:7,9 <b>drop</b> 106:11 166:25 <b>dropped</b> 93:6,24 95:2,3 97:9,14 165:20,21 <b>dropping</b> 132:22 165:19 166:20 <b>drops</b> 132:13 <b>drove</b> 15:10 63:15 76:18 80:10 81:21 82:22 173:12 <b>dry</b> 59:4 83:19 <b>DSU</b> 64:23 150:7 <b>Due</b> 15:9 <b>Duggan</b> 4:13 118:9 121:21 <b>dumps</b> 204:18 <b>duty</b> 12:4,5,8 34:9 34:10 57:11 196:8 202:5 <b>dynamic</b> 184:9,13 199:21 201:2	<b>earlier</b> 42:18 119:14 133:13 167:19 168:22 169:10 182:24 208:22 216:15 <b>early</b> 18:19 56:16 56:18 188:7,16 <b>easier</b> 193:19 <b>easily</b> 112:22 <b>effect</b> 55:15,18 105:5 162:3 181:20 182:20 188:23,25 195:12 203:18 204:9 216:14 <b>effective</b> 110:2 138:25 140:23 141:3 174:8 <b>effectively</b> 5:12 10:20 62:21 100:22 113:19 165:25 166:5 197:10 214:18 <b>eight</b> 34:3 186:15 192:25 209:13 <b>either</b> 7:11 8:6,8,14 25:11 47:7 68:17 70:14 87:13 90:6 104:12 110:21 120:19,23 143:10 152:9 153:17 173:12,15 212:16 213:20 <b>elaborate</b> 198:23 <b>electric</b> 81:12 84:18 <b>element</b> 214:21 <b>eliminate</b> 102:6 <b>eloquently</b> 165:10 <b>emerged</b> 104:25 147:5 <b>emerging</b> 55:9 194:8 <b>emphasis</b> 169:24 <b>employed</b> 190:17 <b>empty</b> 154:1
<hr/> <b>E</b> <hr/>				
<b>E</b> 222:3				

<b>en</b> 72:17	<b>evening</b> 36:23	<b>expected</b> 217:17	94:19 99:9 101:25	<b>fence</b> 54:21 55:7
<b>enable</b> 171:4	56:19 59:4	218:3	138:3 145:25	194:6
<b>enabling</b> 189:9	<b>event</b> 30:13 31:3	<b>expensive</b> 181:7	147:2 151:21	<b>fetch</b> 1:3 57:1
<b>encroaching</b> 140:6	70:10 162:5,9	<b>experience</b> 120:12	167:14 172:17	<b>field</b> 136:23
<b>endangered</b> 203:24	171:2 188:2 190:3	190:11 196:2	174:1 181:5	<b>fifth</b> 96:1
<b>endangering</b>	197:8 199:4	<b>expert</b> 133:8	190:16 194:19	<b>file</b> 47:20 133:5,5
204:16	206:14 209:8,17	<b>explain</b> 14:3 71:15	199:11 202:9	219:13
<b>ended</b> 12:10 155:6	<b>events</b> 1:24 18:18	96:9 123:1 172:4	<b>fail</b> 184:13,15	<b>fill</b> 38:5
176:13	27:6 30:4 57:7	185:11 190:15	186:25	<b>filled</b> 38:7 191:7
<b>ends</b> 162:13	131:12 132:24	<b>explained</b> 3:19	<b>failed</b> 41:19	<b>filling</b> 167:17
<b>energy</b> 204:13,18	196:21 197:3,13	101:18	<b>faint</b> 164:18,20	<b>finally</b> 175:17
<b>engaged</b> 22:14	<b>everybody</b> 116:5	<b>explaining</b> 114:14	<b>fair</b> 28:3 178:23	182:6 209:7
24:11,19 25:1	211:3	<b>explanation</b> 123:17	180:4,11 183:2,8	220:20,23
38:2 42:19 43:4	<b>evidence</b> 2:6 10:3	168:25	<b>fairness</b> 45:16	<b>find</b> 153:5,7 156:17
55:20 110:5	55:15 116:7	<b>explicit</b> 179:2	129:10	182:23 184:5,19
188:23 190:19	117:14,14 126:21	<b>explore</b> 55:14	<b>false</b> 55:13 181:7	184:19
207:15	128:4 132:20	148:6 166:12	<b>families</b> 120:24	<b>finding</b> 158:11
<b>engaging</b> 88:23	134:17 135:9,17	<b>exposed</b> 163:4	<b>family</b> 7:5 116:24	<b>findings</b> 134:15
<b>engine</b> 82:23	135:18 136:16,20	<b>express</b> 203:5	120:11,13	<b>fine</b> 128:21
212:13	136:21 137:7	<b>expressed</b> 181:18	<b>far</b> 6:17 16:1 23:21	<b>finger</b> 96:10 99:25
<b>enquiry</b> 20:21	150:14 157:18	<b>expression</b> 202:23	49:12 67:1 68:5	100:11
<b>enter</b> 9:16 14:16	178:2 194:21	<b>extant</b> 120:18	70:15 72:10 81:18	<b>finish</b> 129:17
<b>entered</b> 66:18	210:8 221:4	<b>extent</b> 11:15,18	83:2,21 104:5	<b>fire</b> 46:22 49:3
<b>entering</b> 204:8	<b>evidently</b> 180:9	21:9 46:13 85:13	106:10 118:7	99:19 100:2,9,12
<b>enterprise</b> 55:19	<b>exactly</b> 5:16 52:9	<b>exterior</b> 82:25	126:15 137:3	100:18,19,22
88:23 199:12	66:16 108:21	85:13	150:18 151:8	104:22 106:3
<b>entitled</b> 116:7	168:16 173:5	<b>extract</b> 148:12,24	160:22	140:8 161:19,21
175:20	219:25	170:11	<b>farce</b> 211:2	161:24 162:2,8,9
<b>entrance</b> 162:12	<b>example</b> 78:7	<b>extraction</b> 148:11	<b>fashion</b> 92:1	162:14,15,24,25
194:4	152:18 154:1	<b>extreme</b> 99:11	<b>fatality</b> 117:8	177:14,20 204:10
<b>entry</b> 194:14	156:4 162:13	103:9 177:10	<b>fatally</b> 147:6	212:4,13
<b>environment</b> 71:17	165:17	<b>extremely</b> 152:13	<b>fatigue</b> 92:20	<b>firearm</b> 22:19 54:2
75:12	<b>execution</b> 170:4	<b>eyeball</b> 64:20,23	<b>fatigued</b> 56:19	54:11 93:12 96:7
<b>equipment</b> 1:7	<b>exercise</b> 11:3 14:15	65:1,11	<b>feature</b> 62:3	98:24 99:2,7,14
<b>equivalent</b> 28:9	16:13	<b>eyes</b> 60:16 138:23	<b>February</b> 47:9,13	101:4,6 110:22,25
73:17,21	<b>exercises</b> 184:13	200:13	47:14	111:10 134:12
<b>escape</b> 26:24 29:20	217:10	<hr/>	<b>fed</b> 60:15 61:12	141:6 146:11,12
<b>essentially</b> 132:21	<b>exhaustive</b> 189:15	<b>F</b>	174:23	176:18 177:12,13
157:9 176:13	189:20	<b>fabric</b> 79:7	<b>Federation</b> 118:6	178:25 179:19
<b>estate</b> 59:23	<b>exit</b> 170:1	<b>face</b> 79:11 131:21	<b>feel</b> 16:13 56:19	180:1 186:22
<b>estimate</b> 130:21	<b>exiting</b> 207:10	132:3,7,11 206:3	147:13 208:14	207:3,25 208:1
<b>et</b> 151:24	<b>expect</b> 31:18,19	<b>facing</b> 64:9 66:19	<b>feeling</b> 189:5	214:8,17 215:18
<b>evaluation</b> 144:3	38:23 155:5 179:1	<b>fact</b> 12:4 15:20	<b>fellow</b> 203:8	216:7,8
198:14	179:1 218:15	34:2 54:9,15 60:7	<b>felt</b> 93:12,22	<b>firearms</b> 4:5 5:13
<b>Evans</b> 126:3,5	<b>expectation</b> 187:16	70:2,14 82:4,18	120:12 177:10	8:6,8,15 19:10,21



20:23 21:14,23	<b>firing</b> 95:6,16	12:13,25 13:2,25	85:21 87:6,7 88:4	106:15 113:20
22:20 23:1,4,9,9	97:18 105:16,17	14:1,13,25 15:6	<b>forgive</b> 119:7 137:6	127:5 129:19
23:20,22,22 24:6	106:5 212:5 213:5	15:14 16:25 17:7	137:23 139:9,15	138:15 145:12
24:9,15 25:2,5,9	214:5	17:10,14,23 60:1	140:21	153:3 163:5 165:7
25:21,23 26:8	<b>first</b> 2:4 5:18 6:24	122:20	<b>form</b> 3:22 9:8,9	174:15,20,20
31:17,20 33:9,24	13:8 22:8 23:5	<b>floor</b> 110:16 206:11	17:10 18:5 28:9	175:12,15 176:10
34:24 35:7,16,19	25:15 40:21 47:2	206:12,15	99:18 123:3 196:5	200:3 201:6 202:9
35:21 36:8,15	60:4 74:2 75:20	<b>fluid</b> 151:15 217:9	<b>formal</b> 51:23	205:16,21 218:8
37:3,10,19,23	89:5 92:15 95:5	<b>focus</b> 139:19 192:7	<b>formally</b> 170:2	<b>frustration</b> 64:25
38:13 39:11,13	103:5 108:17	192:11	171:5	65:2,9
42:22 43:8,11,23	111:17 113:15	<b>focused</b> 137:25	<b>format</b> 21:13	<b>full</b> 6:20 66:15
44:14 46:11,13	117:7 119:16	180:24 205:17	155:16	117:18
47:11,19,20 48:18	120:3 121:12,14	<b>focusing</b> 194:25	<b>forms</b> 149:24	<b>fully</b> 81:18 172:13
48:24 51:2,14	130:8 134:4 159:6	<b>fogged</b> 112:8	<b>formulate</b> 61:24	<b>function</b> 122:1,3
52:3 55:1 56:18	160:25 161:3	<b>fogs</b> 142:25	67:7	<b>furniture</b> 152:11
64:25 71:21 73:14	171:16,20,23	<b>folder</b> 38:13	<b>formulated</b> 67:4	154:14
74:20 76:9 78:3	188:22 195:14,15	<b>folders</b> 47:21	215:25	<b>further</b> 56:1 95:10
114:11 115:2	196:1 197:20	<b>follow</b> 79:18	<b>formulating</b> 62:14	98:15,16 105:25
118:2,19,23	198:5 210:5	171:15	76:24	106:9,22 134:1
119:15,19 121:25	214:18,25	<b>followed</b> 132:16	<b>forward</b> 13:7 135:1	202:19 211:22
122:6 123:15,17	<b>Firstly</b> 109:19	147:20 148:10	<b>found</b> 209:23	220:22 222:11
143:24 145:21	217:2	154:22	<b>four</b> 13:14 17:3	
151:14 154:22,25	<b>fitted</b> 60:11 61:1	<b>following</b> 68:2	58:24 62:21 85:17	<b>G</b>
156:21 163:24	62:11	69:21,25 73:17	97:19 98:1 127:7	<b>G1</b> 48:5 113:23
175:19 180:6	<b>five</b> 20:7 52:18 97:5	94:22 116:11	133:14 150:4	149:8 168:18
181:14 184:25	190:3,4 208:7	141:20 154:19	151:9,21 190:4	182:8,10
185:6,12,25	209:9 211:9	188:16 193:18	<b>four-car</b> 194:14	<b>gain</b> 172:7 194:13
190:25 191:9,13	<b>five-and-a-half-y...</b>	197:10 221:8	<b>fourth</b> 27:15 31:24	<b>gap</b> 200:12 213:22
191:15,17 196:9	39:23	<b>follows</b> 145:4	32:2 46:19 119:12	<b>gate</b> 55:6,6 194:5,5
197:10 200:6,20	<b>five-year</b> 209:23	<b>food</b> 189:3	<b>Fourthly</b> 163:4	<b>general</b> 5:13,19
200:21,25 201:1	<b>flashing</b> 87:11,14	<b>foot</b> 15:8 19:9 35:5	<b>frame</b> 85:16	21:10,13,23 26:12
208:16,18 214:22	<b>fleeing</b> 75:19	72:12 73:3 74:4	<b>free</b> 147:13 157:9	38:13 47:18,20
215:7 216:1 218:1	<b>flexibility</b> 147:24	75:19 79:3 98:13	221:5	71:21 88:2 159:10
219:24	148:5,13 152:16	169:24 170:10	<b>Friday</b> 9:25	181:10 184:23,24
<b>firearms'</b> 24:17	153:24 172:5,11	171:18,23 187:18	<b>friend</b> 108:15	191:15,17 213:17
<b>fired</b> 54:11 89:15	172:13 182:21	191:24,25 194:24	121:10	<b>generally</b> 114:21
95:20,21 96:11	<b>flexible</b> 152:14,15	216:14	<b>friends</b> 121:9	162:4 184:4 219:3
98:4 99:12 103:1	157:7	<b>football</b> 56:6	<b>friendship</b> 121:8	219:4,16
103:17,23 104:16	<b>flinch</b> 131:6 143:8	<b>footwell</b> 79:3,5	<b>front</b> 11:5 30:1	<b>genuinely</b> 120:25
105:1,3,14 127:8	164:22	<b>force</b> 27:12 44:6	59:8 61:21 66:18	122:5
129:5 135:2	<b>flinched</b> 135:6	154:24 175:20	69:7 73:18 78:1	<b>getting</b> 10:14,18,23
211:23,25 212:3,6	<b>flinching</b> 131:8	176:1	78:13 82:3,5,17	34:20 55:10 72:7
213:19	143:11	<b>forced</b> 26:23 29:12	85:21 88:12,13,16	76:5 110:6,14,16
<b>firer</b> 134:15	<b>flip</b> 10:3,6 11:5,15	29:15	89:19 97:7 104:10	110:17 111:11,18
<b>firer's</b> 134:20	11:18,24 12:5,9	<b>foregrip</b> 84:24	104:13 105:10	111:19,20 122:13

125:23 147:8	32:23 41:2 47:18	192:10 194:12	135:19 136:2,5,16	167:5 190:4
157:3 194:9 205:2	52:18 63:19 70:12	195:2,3,7 196:14	137:17 144:14	206:24 207:20
205:24 207:7,16	70:22 80:12 81:19	198:18 200:22	149:19 156:17	218:11
207:23,25 208:9	112:20 113:2,9,18	202:14 206:11,12	177:11,25 182:3	<b>halfway</b> 81:4
208:12,17	113:23 114:2	206:14,18 211:8	<b>great</b> 64:15	106:24 107:17
<b>give</b> 2:18 6:18 9:9	130:8 131:16	211:12 214:15	<b>greater</b> 53:5 155:14	<b>halves</b> 89:23
17:18 47:12 49:13	153:4 156:7	216:1,10	155:18 156:16	<b>hand</b> 26:23 29:12
68:16 86:13 92:2	158:20,23 159:19	<b>good</b> 26:24 29:20	160:2,4,9,12,19	29:15 81:5,5,9,12
93:15 94:19 99:1	161:21,24 162:1,8	57:19 116:23	161:10,12 178:13	84:13,14,17,17,24
113:13 117:14	166:19 168:17	124:10 144:12	<b>green</b> 12:21 13:1	84:25 91:3,9,17
120:12 128:3	169:18 174:11	168:3	16:5 56:1 59:11	91:17,18,20,23
149:6 150:13	175:17 177:25	<b>Gordon</b> 18:14	59:19 60:8 87:8	92:11,16,17 93:6
187:22 189:20	178:19 180:13	<b>grab</b> 93:11 100:18	87:18,21,22,23	93:7,8,10,16,17
<b>given</b> 3:20 6:5	182:8,19 185:12	207:2	<b>grip</b> 81:9 84:14,24	93:19,20,25 94:1
12:20 16:4 18:8	205:1 206:18	<b>grabbed</b> 98:24	<b>groin</b> 91:9,14,16,17	94:3,5,6,12,13
25:4,7,10 31:7	207:14 214:3	177:15	91:19,20 92:16,16	95:4,5,6,19 96:4
36:1 37:13,14,21	217:4,18 218:3,17	<b>grabbing</b> 99:2	93:10 101:11	96:15,15,19,24
38:1 39:12 41:25	221:5	207:24	202:23	97:1,9,14 98:5,7
48:9 49:23 54:14	<b>goes</b> 19:23 48:21	<b>grain</b> 204:3,5,7	<b>ground</b> 126:7 171:5	98:10 105:25
59:22 63:3 66:15	130:14 131:4	<b>Grainger</b> 1:14 23:3	184:21	132:13,16 142:4
74:16 111:3,9	<b>going</b> 1:10 4:1 9:4,8	43:20 88:15 90:21	<b>group</b> 44:1,1,7 46:8	165:19,20,21
114:7 134:15	9:9,12 13:6 22:7	90:25 94:22 97:14	46:20 49:1,22	166:2,4,5,13,20
139:9 143:10	44:8,10,21 45:1	98:20,21 99:9,14	52:12,14 53:5,13	166:25 167:3
151:3 172:21	45:14 50:1 55:13	100:10,16 101:14	191:12	177:25 202:22
190:18 192:8	61:7 62:23 64:1	101:19 104:19,22	<b>group'</b> 53:16	212:6 213:6
195:3,4 206:6	65:4,16 68:3,7,8	104:23 106:7,13	<b>guard</b> 99:25 100:3	<b>handgun</b> 26:22
209:19 216:13,16	69:25 71:10,19	106:22 107:4,7,20	<b>guess</b> 87:16	29:7,10
218:7	75:11,23 77:15	109:12,25 111:7	<b>guessing</b> 64:3	<b>handheld</b> 69:19,23
<b>gives</b> 92:11	78:3 79:19,21,22	111:12 113:16	176:13	<b>handle</b> 142:3,4
<b>giving</b> 2:21 20:18	80:6,16 91:18	124:12,14 125:1	<b>guidance</b> 3:5	166:15,18 167:2
40:1 189:5 218:2	92:17 94:1 99:19	126:17 129:11	116:11	178:1 202:25
<b>glass</b> 60:11 61:1,13	100:22 103:3	134:14,25 135:5	<b>gun</b> 81:5,8 127:2	208:10
61:20 62:2,11,21	104:23 110:15	135:25 137:25	131:13 140:2,9	<b>hands</b> 74:12 84:23
109:14 112:4	113:7 115:22	138:3 139:5,16,19	141:21 142:6,9	85:7 89:10,21,22
131:8,10 135:5	118:21 128:3	141:20,23 144:17	145:15,18 162:7	90:20,22,23,25
143:11 174:14,15	129:9 130:19	145:1 147:6	162:17 211:23,25	94:10,25 95:2,3,4
174:20 175:15	140:8 143:8	165:20 171:11	<b>gunpoint</b> 26:22	95:15 97:2,8,13
204:10	147:12,24 148:1,4	176:13,20 177:24	29:7,9	98:20 99:10,16
<b>gloves</b> 130:6 182:5	149:4,13 152:15	179:18 197:6,16	<b>gunshot</b> 105:16	106:14 107:1,3,6
202:11,17,19	152:16 158:24	198:1,2,5,8 202:2		107:10,13 110:20
<b>GMP</b> 147:11 161:5	161:1 162:8 166:2	202:22 205:9,9	<b>H</b>	110:21,23 111:3
170:9 171:9	166:4,7,8,13	207:2,4,6 211:25	<b>hacksaw</b> 54:21	129:7,19 130:1,2
218:24 219:2,9,16	168:3,24 169:7,18	213:12	55:10,23 194:9	130:3,5,8,19
<b>go</b> 3:8 8:4,20 9:5	177:16,20 179:24	<b>Grainger's</b> 3:11	<b>half</b> 51:21 71:1	131:2,8,10,16,23
11:9,11 13:7	182:22 183:20	42:13 43:25 98:5	87:11 165:24	132:22 136:2,5,17

136:21,23 137:8 137:17,22 138:7 139:10 140:4 141:24 182:3 202:10 205:12,17 205:18 207:5 208:10 <b>hands'</b> 98:23 <b>handwriting</b> 2:3 <b>handwritten</b> 45:6 <b>hang</b> 115:21 168:13 <b>Hankinson</b> 48:2 <b>happen</b> 14:8 33:1 45:18 49:17 53:7 65:3 112:6 148:14 167:24 <b>happened</b> 14:6,8 14:20 46:25 53:2 53:4,11 57:7 94:25 114:22 115:10 117:5 146:14 157:18,22 166:23 167:14 181:2 187:23 216:15 <b>happening</b> 202:9 <b>happy</b> 3:25 9:19 <b>hard</b> 74:25 142:16 152:23 <b>harder</b> 62:5 <b>harm's</b> 71:19 <b>hazard</b> 152:9 <b>haze</b> 87:19,21,22 <b>hazy</b> 87:22,23 <b>head</b> 8:12,13,15 67:7 107:2,3 129:23 133:18 134:20 <b>headed</b> 66:14 143:21 169:10 <b>headlights</b> 90:9 <b>hear</b> 1:15 10:20 80:17,20 84:1 89:15 113:9 128:3 128:23 129:5	178:15 <b>heard</b> 10:3 23:21 24:12,13 27:11 40:22 65:10 125:6 129:14 181:18 189:19 210:8 <b>hearing</b> 126:10 128:17,18,19,21 <b>heavily</b> 185:10 192:23 <b>heel</b> 79:3 <b>held</b> 13:4 26:22 29:6,9 49:6,23 52:10 84:13 159:12 215:22 <b>help</b> 24:8 35:13 41:7 127:17 130:7 130:13 145:20 147:11 157:11 164:3 169:8 <b>helped</b> 7:5 211:9 <b>helpful</b> 175:11 209:23 <b>Hey</b> 15:11,16,20 <b>hidden</b> 100:23 <b>high</b> 37:21 181:6 <b>higher</b> 8:10 170:19 <b>highlight</b> 17:14 44:10 <b>highlighted</b> 44:5 192:5 <b>highlighting</b> 5:22 <b>Highly</b> 15:7 <b>hindsight</b> 14:23 <b>historic</b> 181:1 <b>hit</b> 204:19 <b>hits</b> 204:14 <b>hold</b> 16:9 42:6 49:8 53:17 54:15 84:21 93:9,24 108:3 177:15 220:18 <b>holding</b> 81:8,9 <b>hole-punch</b> 55:5 91:8 94:19 102:11 <b>hollow</b> 204:4,12,13	<b>Holroyd</b> 18:11,12 <b>hone</b> 20:8,11 <b>honestly</b> 41:8,8 175:20 <b>hope</b> 178:15 191:17 <b>horizontal</b> 84:10 85:3 89:7 <b>hot</b> 143:21 <b>hour</b> 71:1 118:16 118:17,22 120:6 168:3 218:11 <b>hours</b> 13:20 46:3 188:7,16 201:3 <b>house</b> 7:24 9:25 11:21 15:10 66:25 <b>hub</b> 219:9,18 <b>hubs</b> 219:11,23	148:12 158:14 163:5 170:15,20 171:11 204:21 <b>imminent</b> 175:21 176:16 <b>impact</b> 54:16 62:20 <b>imperative</b> 65:10 <b>imply</b> 181:23 <b>importance</b> 117:10 <b>important</b> 27:20 43:14 58:12 62:3 94:8 117:13 <b>imposed</b> 39:3 <b>impossible</b> 163:19 167:1 <b>impression</b> 55:18 92:2,12 <b>improper</b> 116:3 <b>improve</b> 195:17 <b>inaccurate</b> 31:22 <b>inappropriate</b> 16:13 <b>inches</b> 85:17 133:14 <b>incident</b> 2:4 5:6,24 7:4 11:10,13,17 13:20 70:21 96:18 115:12 117:1,2,19 122:23 123:7 185:24 <b>incidents</b> 9:20 198:24 <b>include</b> 16:1 43:25 183:18 190:24 <b>included</b> 42:9 120:7 <b>including</b> 15:22 79:15 193:7 203:20 <b>inconsistent</b> 161:4 <b>incorrect</b> 52:25 60:3 219:19 <b>increase</b> 81:15 <b>increased</b> 165:2 219:4	<b>increasing</b> 167:9 170:25 <b>independent</b> 189:10 <b>indicate</b> 179:18 214:7 <b>indicated</b> 122:17 124:25 133:13 <b>Indicates</b> 131:17 212:7 <b>indicating</b> 84:11,11 <b>individual</b> 38:11 183:10 <b>individuals</b> 72:10 151:24 <b>inflammatory</b> 122:12 <b>influencing</b> 14:16 <b>information</b> 9:3 10:14,16,17 12:20 19:17 31:7,8 39:6 39:12,15 42:10 48:17 49:5,13,21 50:24 52:11,16 54:16,20 58:12 59:22 63:3,20 88:18 125:10,12 180:20 190:18,19 195:13 210:4 <b>informed</b> 188:21 <b>initial</b> 3:5 6:16 13:3 13:6 115:16 170:23,24 175:2 188:1,5,15,20 189:6,8 195:13 <b>initially</b> 98:25 111:4 125:2 <b>initiated</b> 51:2 <b>Inn</b> 15:16 63:15 <b>inquest</b> 120:21 <b>inquiries</b> 209:20 <b>Inquiry</b> 2:6 116:2,6 209:12,13 221:8 <b>Inquiry's</b> 108:19 <b>inside</b> 65:15 66:2
<b>I</b>				
		<b>ICI</b> 38:16 <b>idea</b> 101:12 <b>identical</b> 191:12 <b>identification</b> 59:14 163:14 <b>identified</b> 32:19 33:9,12,15,20,23 34:4 126:3,14,16 <b>identify</b> 163:12 <b>identity</b> 38:16 210:11 <b>ignition</b> 166:8,14 166:18 <b>illuminated</b> 81:24 84:5 85:19 87:24 88:9 90:14 96:10 99:23 163:16 <b>illumination</b> 83:9 86:1 <b>images</b> 169:5 <b>imagine</b> 57:10 <b>immediate</b> 148:24 170:3,8 171:6 177:2,7 185:21 194:22 <b>immediately</b>		

82:1 103:3 134:21 171:2 203:12 <b>Insofar</b> 198:13 <b>inspector</b> 8:9,10,14 114:10 <b>instinct</b> 184:21 <b>instincts</b> 184:12 <b>instructed</b> 79:14 116:9 129:18 131:2 <b>instructing</b> 140:16 <b>instruction</b> 79:18 79:20,25 80:2 111:3,5,9 203:5 <b>instructions</b> 69:20 69:24 140:15 <b>instructor</b> 74:20 <b>intel</b> 60:23 <b>intelligence</b> 19:2,12 19:14 20:1,9,15 20:17 21:21 22:5 22:22,25 24:10,12 25:5,8 26:14,18 28:15,19 31:11,13 31:16 34:23 35:6 35:10,15,20,25 37:1,3,5,18,22 38:20,21 39:4,10 39:17 41:14,25 43:12,15 44:23 48:22 52:7,15 56:1 58:1,8,19 60:10,14 99:13,13 141:25 178:24 179:17,23 180:14 180:16,19 181:1 214:7,14,23 215:2 215:4,10,21 216:13,16 <b>intended</b> 58:5 80:9 80:14 <b>intent</b> 38:16 42:22 43:5 195:5 <b>interception</b> 191:24,25 194:24	<b>interest</b> 193:24 <b>interference</b> 211:13 <b>interior</b> 83:2 <b>internal</b> 90:13 <b>interoperability</b> 219:23 <b>interpretation</b> 108:18 192:7 202:8,24 <b>interpreted</b> 23:22 24:5,8 190:23 <b>interrupt</b> 168:2 <b>intervention</b> 44:25 45:15 72:17 75:22 152:13 <b>interview</b> 3:24 19:6 35:2 40:7 41:5 47:23 52:5 53:25 87:18 94:15 97:5 160:9 179:5,7 190:5 195:15 197:20,20 198:17 206:18 <b>interviewed</b> 9:21 40:2 61:7 189:25 <b>interviewer</b> 19:9 94:20 <b>interviewers</b> 36:11 <b>interviews</b> 181:20 195:14 206:20,21 <b>introduced</b> 218:19 <b>investigate</b> 134:13 <b>investigating</b> 4:2 19:17 <b>investigation</b> 122:9 189:10 <b>involuntary</b> 143:3 143:15 164:12 <b>involve</b> 183:6 215:7 <b>involved</b> 5:19 11:10 46:8 52:14,21 53:8 54:1,10 117:7 118:8 152:23 199:1 <b>involved'</b> 52:12	<b>involves</b> 214:21 215:5 <b>IPCC</b> 3:24 8:7,23 8:24 9:5,10,13,15 9:18 189:9,25 214:6 <b>iron</b> 86:6,8,8,9 <b>irony</b> 18:1 <b>issue</b> 98:15 216:19 <b>issues</b> 117:16 119:1 120:9,10 123:6 181:16 <b>iteration</b> 196:1	<b>justifying</b> 175:11 186:6	124:2 125:9,22,22 126:3,21 129:2,3 131:5 139:17 140:7,23 141:8 142:2,24 143:2 145:3 146:22 154:13,14 156:6 163:21,22 166:17 166:17,18 167:23 167:25 168:13,16 174:8,14 175:19 175:23 182:7 185:15 188:18 194:13 197:16 198:1 202:13 203:7 205:9 207:22,24 211:15 217:6 <b>knowing</b> 158:20 161:25 <b>knowledge</b> 23:10 46:20 47:5 49:24 62:20 89:16 174:22,25 190:11 203:11 210:21 <b>known</b> 4:14 60:25 64:12 126:12,13 161:8,9 164:21 194:18 199:5,15 210:11 <b>knows</b> 168:16 211:3
		<b>J</b>	<b>K</b>	<b>L</b>
<b>J4</b> 10:7,7,14 161:22 161:24 162:3,5 <b>jacket</b> 59:11,12 <b>Jackson</b> 63:22,23 66:18 83:12 <b>January</b> 23:14 <b>Jeans</b> 59:11 <b>job</b> 62:5 105:24 136:10,12 143:19 155:6 174:5 <b>jobs</b> 216:20 <b>join</b> 5:9 114:24 115:7 <b>joined</b> 5:10 185:25 <b>joint</b> 199:11 <b>Jones</b> 18:12 <b>journey</b> 66:15,22 67:1,3 81:2 <b>judge</b> 39:3 211:16 <b>judged</b> 72:24 210:17 <b>July</b> 116:6,12 209:13,17 <b>junction</b> 15:11,16 <b>June</b> 179:7 190:1,5 <b>justification</b> 197:5 208:25 <b>justified</b> 27:21 169:13 215:6 <b>justify</b> 24:5	<b>keep</b> 90:23,25 109:24 141:4,4 159:7 <b>keeping</b> 139:7 <b>kept</b> 107:22 108:1 108:7 109:6,10,19 <b>key</b> 166:8,14,18 <b>keys</b> 26:23 29:13 29:15 <b>kids</b> 211:6 <b>kind</b> 11:3 14:15 36:25 76:14 165:8 <b>knee</b> 79:2,7 <b>knees</b> 79:2 106:25 <b>knew</b> 25:17 26:6 60:10 70:21 94:10 101:16 117:13 124:14 152:15 161:15 188:21 189:21 205:22 218:7 <b>knife</b> 24:15 <b>know</b> 4:2,25 5:6,8,9 6:22 7:16 8:25 10:11 14:17 20:1 31:21 33:23 34:2 34:14 36:13,14 37:9 39:14 40:2 40:18,21,23,25 41:6,8,22 44:6,23 56:21 60:3 63:12 64:20,21 69:3,16 70:10,19 75:19 76:5 78:4,7,10 82:17 93:22 98:23 100:15,16 101:3 101:14,25 102:3 105:15,23 106:4 108:23 110:2 119:10,23 120:16 120:21 122:17	<b>labour</b> 198:18 <b>laden</b> 192:23 <b>lads</b> 35:18 <b>laid</b> 63:17 <b>laminated</b> 114:13 204:10 <b>land</b> 86:20 <b>lands</b> 86:24 <b>Lane</b> 15:11,17,20 63:23 <b>language</b> 30:7		

45:11,22 108:18 109:20 122:12 187:5,11 193:9 <b>lap</b> 91:4 92:3,13 95:5 96:5 97:10 98:21 99:1 139:6 142:5,7 165:22 166:6,7,11,14,16 166:17,21 167:1,3 178:4 202:23 207:2 <b>largest</b> 72:3 <b>laser</b> 87:5,5 96:11 99:23 176:22 <b>lasted</b> 118:15 <b>lastly</b> 15:8 167:11 216:19 <b>late</b> 77:1 173:9 <b>laterally</b> 100:18 177:15 212:15,15 212:16 213:7 <b>law</b> 39:3 <b>lawyer</b> 18:10 <b>lawyers</b> 118:4 <b>lay</b> 11:20 26:20 28:25 29:3 46:6 76:6,8 <b>layman's</b> 86:17 <b>layout</b> 217:20 <b>lead</b> 43:10 180:14 <b>leaning</b> 135:1 <b>leap</b> 215:5 <b>learnt</b> 219:6 <b>leave</b> 13:1 108:22 108:23 159:1 211:19 220:21 <b>leaving</b> 58:22 66:24 148:17 216:23 <b>led</b> 27:11 36:7 141:2 215:10 <b>left</b> 38:5 44:20 59:17 66:13 69:11 79:3,4 81:12 84:17,25 85:21 93:8,15,17,20,25	94:1,5 95:4,6,19 96:20,24 97:14 98:10 132:16 164:23 212:16 217:9,24 <b>left-hand</b> 11:23 <b>leg</b> 79:4,4,5,8 <b>legal</b> 2:12 3:18 17:11 18:8 92:6 115:13 <b>Leigh</b> 13:1,4 45:25 46:6 52:1,10,20 53:6 54:5 56:3 58:22 125:16 196:14,22 198:9 198:13 <b>length</b> 64:21 208:21 <b>let's</b> 11:22 133:23 136:25 137:4 138:2 150:20 156:11 199:4 203:7 210:7 <b>lethal</b> 175:20 176:2 176:16 180:9 188:23 203:18 <b>letting</b> 74:2,6 75:14 <b>level</b> 37:21 90:4 121:8 151:13 154:22 169:12,15 170:20 172:8 177:21 181:5,18 185:19 210:21 <b>levelled</b> 84:5,7,8,10 85:1 <b>lie</b> 205:13 <b>life</b> 14:10 141:13 176:4 210:1,5,11 <b>life-threatening</b> 175:21,23 <b>light</b> 83:5 84:6 85:15,20 86:1 87:8,9,11,22,23 87:23,24 88:7 90:14,15	<b>lighting</b> 83:7,14 <b>lights</b> 81:24 82:25 83:2,8,13 90:10 90:13 152:10 <b>likelihood</b> 164:12 <b>likewise</b> 159:10 <b>limit</b> 162:17 <b>limitations</b> 163:1 <b>limited</b> 79:20 178:18 <b>line</b> 2:16,16 3:21 4:1 45:6 54:21 55:7,10 97:21 104:18,22 161:19 161:21,24 162:2 162:14 194:6,8 <b>lines</b> 13:14 48:9,19 72:6 74:18 97:5 103:7 152:20 156:18 208:7,7 <b>linked</b> 40:13 41:12 46:21 47:10 49:1 52:2 53:13 189:22 <b>links</b> 48:22 <b>listed</b> 193:15 <b>listen</b> 125:15 220:17,25,25 <b>listening</b> 124:16,21 <b>literally</b> 15:21 <b>little</b> 21:7 22:7 45:22 71:15 122:6 182:24 183:2 <b>live</b> 210:15 <b>lives</b> 202:5 <b>LO8</b> 15:4 <b>loaded</b> 108:18 <b>location</b> 16:5 66:23 76:10 77:14 193:25 195:4 <b>locations</b> 16:21 17:5 <b>locked</b> 55:6 194:5 <b>LOD</b> 15:4 <b>logic</b> 72:15 73:6 215:5	<b>logistics</b> 7:22 <b>long</b> 1:8 97:2,3,17 116:11 118:15 120:3 <b>longer</b> 97:4 112:10 114:3 <b>look</b> 11:22,24 15:14 16:16 19:6 23:2 25:14 27:2,14 32:12,23 35:2 39:18,22 40:6 45:4 46:18 55:1 65:24 71:21,22 74:5 86:18 91:5 95:24 98:13 102:9 103:5 104:3 107:5 107:16 110:3 113:5 127:19 129:23 133:23 149:8 150:21 151:20 156:7 159:2,3,18 168:24 179:6 191:15 195:21 219:13 <b>looked</b> 47:8,15 106:23 107:6,8 122:20 127:23 129:19 207:7 216:14 <b>looking</b> 16:25 20:4 44:12 74:20 97:24 129:22 131:13,20 131:21,22 132:3,4 139:15 146:23 156:25 157:25 163:19 164:3 167:17 168:19 172:5 193:21 <b>looks</b> 86:16 88:2 <b>lopsided</b> 156:24 <b>lose</b> 75:14 <b>loss</b> 64:18,20,23 65:1 <b>lot</b> 11:16 30:7 31:21 119:10	189:19 192:11 <b>loud</b> 105:5 <b>louder</b> 181:23 182:1 <b>low</b> 84:9,11 <b>lower</b> 79:8 81:3 91:9,17 93:10 169:15 171:15 206:24 207:20 <b>lowered</b> 91:3,20,23 92:10 98:8 107:10 212:4,5 <b>lowering</b> 92:12,15 93:15 98:11 107:13 <b>lunch</b> 9:24 56:5 <b>Luncheon</b> 116:18 <b>lunchtime</b> 9:24
<b>M</b>				<b>ma'am</b> 178:14,16 180:7,10,22,25 181:3,8,15,22 182:5,12,18 183:1 183:9,13,17 <b>machete</b> 24:15 <b>Mackie</b> 2:14 3:19 115:14 188:6 <b>Madam</b> 211:12 <b>main</b> 64:22 83:8 <b>maintain</b> 200:2 201:16 <b>making</b> 3:14 16:19 30:2,18 119:5 138:24 141:17 152:1 170:22 173:18 174:9,10 177:9 <b>male</b> 58:20 199:9 <b>man</b> 73:22 126:17 135:24 140:14,19 142:11 186:21 <b>Manchester</b> 4:6 155:14,18 156:16 160:2,4,10,12,19

161:10,12 178:13 <b>manual</b> 3:5 <b>March</b> 1:25 3:9,17 6:20 7:19 16:18 18:18 27:6 41:23 55:25 60:20 61:5 71:25 96:19 117:21 120:16 121:14 152:5 161:15 171:20 175:6 187:14 188:11 189:17 190:9 195:22 196:8 205:5 209:7 219:2 <b>Mark</b> 4:12 118:9 121:21 <b>markings</b> 48:20 <b>mass</b> 11:4 96:12 <b>MASTS</b> 32:25 45:8 45:13,17 72:17 148:17 152:19,22 154:20 155:16 156:21 159:21 161:7 182:13,14 184:16 187:4,6,9 187:15 219:16 <b>material</b> 149:4,22 149:23 159:25 169:1,2,4,9,9 <b>matter</b> 13:20 108:12,14,19 158:11 197:18 <b>matters</b> 16:21 17:4 180:18 <b>May/June</b> 154:21 <b>mean</b> 8:8 23:22 24:16,17 25:12,21 26:8 36:8 44:2 51:1 61:11 75:1,9 83:16 84:8 87:21 89:25 90:1 105:11 111:20 112:10 120:10 122:19 126:6 137:5,13,14	139:17 157:25 158:1 160:24 181:23 <b>meaning</b> 24:6,9 31:4 <b>means</b> 24:15 35:13 <b>meant</b> 23:9 42:21 167:12 <b>measure</b> 56:16 <b>measured</b> 201:2 <b>measures</b> 210:10 <b>meet</b> 5:3 6:19 <b>meeting</b> 3:18 4:4,25 5:12,13,15,16 6:23 7:1 18:10,16 47:8 49:6,16,21 49:25 50:6,9 51:12 117:21,22 117:25,25 118:11 118:12 119:22,23 <b>meetings</b> 7:12 49:10 <b>member</b> 4:21 5:7 216:24 <b>members</b> 5:4 71:18 118:25 216:1 <b>memory</b> 12:14,15 28:1 30:10 <b>men</b> 24:25 31:4 53:20 54:9 127:5 138:14 139:10 163:5 181:12 204:21 <b>mention</b> 23:3 34:23 36:15,19 77:19 216:9 <b>mentioned</b> 5:14 6:6 6:7 38:23 42:18 43:22 48:12,13 49:12 61:4 119:11 137:4 175:2,5 <b>mentioning</b> 53:23 53:25 <b>merits</b> 210:13 <b>message</b> 181:9	<b>met</b> 4:22 121:12,14 155:15,16,18 160:5,15,16 219:6 220:12 <b>metal</b> 55:7 86:6 194:6 203:20 <b>metres</b> 176:20 <b>mid</b> 89:24,25 <b>Mid-2010</b> 150:3 <b>middle</b> 12:19 40:11 94:19 103:6 155:13 193:16 198:19 219:21 <b>Mike</b> 2:14 3:19 4:20 <b>millimetre</b> 204:3 <b>mind</b> 9:16 14:16 17:25 23:18 44:11 54:12 101:7 187:5 187:16 192:17 195:5 200:5 <b>mine</b> 99:3 212:6 <b>minimise</b> 176:3 <b>minute</b> 193:10 <b>minutes</b> 1:12,13 13:4,15 14:7 64:19 71:1 114:1 120:5,6 168:3 200:9 <b>missed</b> 138:19 <b>missing</b> 37:4,12,17 <b>misspelling</b> 15:22 <b>mistake</b> 122:18 <b>mistakes</b> 44:9 <b>mitigate</b> 102:6 <b>mode</b> 21:15 <b>model</b> 184:5 <b>moment</b> 21:23 37:16 56:22,25 62:24 111:17 135:4 148:5 150:13 151:17 152:17 156:12 158:25 168:4,5 <b>moments</b> 131:2	165:21 <b>Monday</b> 3:18 <b>money</b> 26:25 29:21 <b>month</b> 70:9,18,20 <b>months</b> 3:21 20:5,7 50:22 51:21,21 190:4 <b>morning</b> 2:8 18:19 20:24 26:4 44:20 56:22 58:1 63:9 79:14 124:7 144:25 188:7,12 188:15 189:5 210:6 <b>mounted</b> 85:8,9 87:6 88:4 <b>move</b> 31:24 57:6,22 98:7,10,21 107:3 122:11,15 136:15 136:23 137:1 139:1,20 168:1 170:7 <b>moved</b> 12:22 55:25 58:10 81:14 136:20 141:23 149:18 <b>movement</b> 15:9 59:2 91:4 92:18 92:22,23,25 93:1 93:2,11,22,23 94:3,4,7 95:11 96:4,14,19,24 97:10 100:3 101:10 106:1,9,22 110:1 135:21,23 139:6,12,18 140:19,20,25 143:15 166:3 202:22 203:4 205:19 <b>movements</b> 80:9,14 143:3 164:13 <b>moving</b> 59:19,20 87:11 135:12,19 160:24 169:5	172:23 <b>MP5</b> 81:10 84:5,7 134:12 <b>munitions</b> 151:12 156:10,15 158:4 <b>murdered</b> 211:3 <b>murderer</b> 210:25 211:5 <b>muzzle</b> 84:12 85:15 133:16,17 <hr/> <b>N</b> <hr/> <b>N</b> 222:3 <b>name</b> 4:15,17 22:3 48:9 116:23 144:12 178:12 <b>named</b> 22:10 <b>namely:that</b> 214:22 <b>narrative</b> 129:17 196:14 197:8 <b>narrow</b> 88:6 <b>national</b> 74:20 <b>natural</b> 83:7 152:9 <b>nature</b> 21:11 64:22 72:18,20 154:13 176:1 209:19 <b>near</b> 54:20,21 79:4 80:6 84:16 96:17 102:24 103:2 128:11 <b>nearby</b> 76:6,8 <b>nearside</b> 59:8 80:16 82:5 112:17,21 128:6 145:2 153:9 153:17 157:16,25 158:3 167:21,22 167:23 173:17 174:12 207:13 213:25 <b>necessarily</b> 22:19 77:23 191:9 203:14 215:6 <b>necessary</b> 170:7 172:9 210:17 <b>necessitate</b> 169:13
--	---	---	---	---

<b>necessity</b> 175:17	<b>number</b> 15:2 16:5	26:6 65:22 80:10	30:23 34:10 38:7	34:15 51:6 60:6
<b>need</b> 75:10 80:7	21:24 134:19	80:15 88:24	38:9 46:8,11,16	68:21 71:3 75:1,6
119:19 133:11	159:19 178:18	126:13,15 159:13	54:11 65:14,16	76:17 116:24,25
196:4 202:19	187:23 196:9	170:1 181:19	69:18 78:3 79:15	125:3 126:2 127:1
209:19		195:6 201:16	79:20 80:1,2	127:3,25 128:16
<b>needed</b> 156:22	<b>O</b>	202:10	102:13,16,17,19	130:8,9,15 131:19
158:22 218:8	<b>oath</b> 1:21	<b>occur</b> 33:1 45:17	103:8,12 105:15	132:3 134:8,9
<b>needs</b> 109:3,15	<b>obey</b> 204:24	<b>occurred</b> 45:2	111:23 112:15	137:16 147:25
<b>negated</b> 172:21	<b>objective</b> 210:8	49:24	113:15 114:1,8,18	148:3 149:16
<b>negotiate</b> 148:25	<b>Objectively</b> 175:23	<b>occurrence</b> 56:17	114:19,21 115:10	156:10,12 169:3
169:11 170:5,12	<b>objects</b> 86:11	<b>OCG</b> 52:2 54:10	118:2,20,24	184:6
170:21	<b>obligation</b> 57:15	<b>odd</b> 45:22	119:15,19 122:7	<b>old</b> 199:1
<b>neither</b> 145:1	176:3	<b>odds</b> 135:18 172:1	122:17 123:15,18	<b>once</b> 89:11,11,12
<b>network</b> 5:23 7:4,6	<b>obscuring</b> 168:12	<b>OFC</b> 48:5 154:7	124:19,25 126:7	125:19 136:17
<b>neutral</b> 108:20	<b>observation</b> 63:25	157:14 220:10	144:18,22 145:21	162:19 181:20
<b>neutralise</b> 138:12	<b>observations</b> 126:9	<b>offence</b> 41:11 42:3	145:22 146:19,24	<b>oncoming</b> 93:12
<b>neutralised</b> 139:3,7	126:10	43:9 57:14	146:25 147:5	99:11 100:19
<b>neutrality</b> 116:1	<b>observed</b> 32:7	<b>offences</b> 39:19	148:16,20 150:4,5	<b>ongoing</b> 23:13
<b>never</b> 136:17	55:14 60:5	<b>offender</b> 42:23 44:1	150:7 154:21,22	50:22
<b>new</b> 136:15 184:5	<b>observing</b> 194:2	44:2,7 46:22 49:3	154:25 155:8,25	<b>open</b> 28:13 44:17
218:19	<b>obsolete</b> 149:17,21	<b>offenders</b> 32:20	156:21,24 158:4	44:20 105:8 107:1
<b>Nexus</b> 7:24 9:25	150:9 151:2,2,5,6	46:8,21 49:1	158:16 160:12	107:10 118:23
<b>nice</b> 169:4	<b>obtain</b> 74:25	<b>offered</b> 220:24	161:25 162:8	145:15,16 158:5
<b>Nick</b> 18:11,12	181:13	<b>offers</b> 169:11	165:4 167:16	158:13 162:18
<b>night</b> 13:18 34:19	<b>obtained</b> 49:16	170:18	170:9 171:1,18	170:25 171:2
54:7 62:12 82:20	<b>obvious</b> 82:22	<b>office</b> 50:4,10 61:9	172:10,15 177:2,9	192:21 203:2
96:18 175:3 188:1	185:2 186:17	61:11,17,19 175:1	179:16 191:7	210:9 216:23
202:16 209:7,20	206:6	<b>officer</b> 4:12 21:23	201:5,8,17 203:8	220:21
210:6	<b>obviously</b> 2:21 5:5	23:25 24:13 42:9	203:24 205:20,23	<b>Open'</b> 159:14
<b>night's</b> 34:11,16	14:17 23:11,25	46:7,13 49:3 54:3	218:17 220:5,6,8	<b>opened</b> 46:22 49:3
<b>non-conventional</b>	42:10 44:5 50:20	59:15 65:20 105:4	<b>officers'</b> 4:5 122:1	<b>opening</b> 116:6
159:3	68:18 74:4 98:25	106:4 112:3 113:6	202:5	<b>Openshaw</b> 18:19
<b>non-firearms</b> 191:1	103:18 104:23	113:7 118:8	<b>official</b> 46:14,17	<b>operate</b> 155:22
<b>normal</b> 21:3 217:3	107:22 108:1	121:17 126:8	<b>offside</b> 59:9 62:25	<b>operation</b> 22:13
<b>normally</b> 131:25	109:10,10,19	140:16 143:24	67:13,22 81:3	23:13 34:5,16
<b>north-west</b> 22:14	119:10 146:11	144:12 146:14	124:3 153:9,18	48:18 49:7 50:2
43:4 48:24	163:24 173:23	150:6 151:14	157:17 167:14,20	50:11,12,15,16,20
<b>nose</b> 64:10	190:3,10 194:11	152:22 161:18,21	173:16 174:12	50:21,22 51:2
<b>noses</b> 65:6	207:25	166:22 175:19	201:4	52:17 60:17,19
<b>notice</b> 36:25 82:20	<b>occasion</b> 8:4 24:2	177:7 183:10	<b>oft</b> 208:17	62:3 145:11
90:8	25:9 30:25 48:25	185:6 193:22	<b>Oh</b> 84:2	154:16 155:18
<b>notion</b> 174:24	52:8 72:24 122:3	201:24 209:16	<b>okay</b> 2:13 8:22,25	156:3 160:10
<b>November</b> 169:2	<b>occasions</b> 30:8	<b>officers</b> 4:22 5:6,14	9:7,10,13,17 11:2	161:5,15 171:9
185:25	189:25	5:23 6:8,15 10:1	14:24 16:12 18:23	173:3 189:22
<b>nozzle</b> 133:14	<b>occupants</b> 25:17	11:10 23:20 30:22	24:23 26:10 34:14	190:12 195:8

196:9,22 199:5 <b>operational</b> 27:16 27:24 73:14 174:5 218:1 <b>operations</b> 23:16 49:23 50:14 52:9 120:20,23 174:22 <b>operators</b> 188:18 <b>opinion</b> 108:12,14 108:19 215:25 <b>opportunity</b> 20:14 20:21 149:6 220:17,24 <b>opposed</b> 33:24 <b>opposite</b> 112:24 <b>ops</b> 61:9,11,17,19 199:1 <b>option</b> 67:12 71:8 71:12,13,14,16 72:11 73:2,11,24 74:22 75:13 99:3 99:6 161:8 169:12 169:14 170:12,18 171:16 211:20 219:4 <b>options</b> 118:23 150:25 166:19 <b>oral</b> 19:1,23 54:24 <b>order</b> 30:4,19 149:5 166:19 178:8 202:2 <b>ordering</b> 164:8 <b>ordinary</b> 128:18 <b>organisation</b> 118:18 <b>organised</b> 49:22 52:11,13 53:5,13 53:15 <b>organises</b> 118:19 <b>original</b> 202:11 <b>originally</b> 150:7 <b>ought</b> 71:5 77:22 129:10 <b>oughtn't</b> 77:22 <b>outcome</b> 20:20	187:6 <b>outlined</b> 116:11 <b>outset</b> 49:7 50:1,23 51:1 52:16 <b>outside</b> 13:4,10 46:16 51:23 59:3 78:11 133:15 134:20 162:18 203:18 <b>outwards</b> 66:19 <b>overheard</b> 50:3 <b>overview</b> 33:14 192:2 <hr/> <b>P</b> <hr/> <b>pack</b> 113:11 149:14 149:17 151:20 <b>package</b> 19:3,12,14 19:24 150:16 159:9,21 182:13 <b>packages</b> 182:8 <b>padlocked</b> 55:6 194:5 <b>page</b> 2:23 12:1,4,17 12:17 13:8 15:3,8 15:15 19:7,9 22:3 22:5 26:13 27:3 27:14 28:13 32:2 32:13 35:5 36:11 38:14 39:18,22 40:11 42:13 46:18 48:15 52:18,18 55:3 58:24 63:19 63:19 65:25 68:9 71:22 91:6 94:18 95:25 97:20,20 98:14 102:10 103:6 110:3,4 133:6,25 149:8,12 151:16 158:1 159:10,19 168:24 170:14 179:13 182:9 191:20 192:2,24 193:19 193:19 196:1,5,7	196:14 197:20,23 198:19 205:6 206:17,19,24 207:14,20,20 208:5 214:3,5 219:13,21 220:16 <b>pages</b> 2:3,11,15 11:23 149:13 150:24 198:17 <b>paint</b> 68:2 152:7 173:4 218:7 <b>painted</b> 22:25 24:10 43:15 179:22 214:14,24 215:4 <b>panic</b> 142:13 165:8 165:9,11 209:3 <b>par</b> 21:16 <b>parade</b> 193:11 <b>paragraph</b> 12:19 15:3 16:16 22:8 25:15 26:11 27:15 27:24,24 28:12,24 31:4,9,15 32:6,24 45:16 46:19 52:6 59:21 63:2 65:25 67:6 72:3,3 96:1 103:6 197:9 205:15 <b>paragraphs</b> 12:18 13:8 31:24 32:2 32:15 52:19 58:24 <b>Pardon</b> 101:22 <b>park</b> 57:8 63:12,21 64:1 65:17 66:14 66:17,22 67:1,3 70:1,25 72:25 76:19 80:11 81:2 81:14,21 83:9,11 123:12 153:15 172:25 173:12 194:1,1 200:10 217:22 <b>parked</b> 64:4 66:16 66:18 70:25	152:11 217:21 <b>parking</b> 64:1,10 <b>part</b> 4:11,19 5:4,18 27:21 34:11 42:18 43:14 44:15 50:14 51:14 54:3,7,10 73:7 80:18 106:3 119:4,22 141:16 147:21 149:2,25 155:1,4 158:25 160:5 173:20 176:1 180:23 184:9 196:13 198:9,21 202:12 214:25 218:11 <b>participated</b> 11:3 <b>participating</b> 62:18 <b>particular</b> 27:9 43:19 129:14 144:3 156:3 157:19 178:20 194:2 195:14 198:19 <b>particularly</b> 3:25 44:12 57:7 168:16 <b>parties</b> 87:2,13 <b>partly</b> 134:25 <b>partner</b> 144:14 <b>parts</b> 5:13 <b>pass</b> 184:13 <b>passages</b> 30:14 <b>passed</b> 31:1 125:13 187:2 <b>passenger</b> 59:8,9 67:22 69:7,8 79:5 82:3,7,15,17 88:13,16 97:7 106:15,16 112:17 113:8 128:7 174:20 205:16,21 205:24 212:16 <b>passing</b> 204:15 <b>pasted</b> 34:6 <b>patrol</b> 46:23 <b>patterns</b> 184:12	<b>pause</b> 108:6 134:6 143:23 149:9 150:13 <b>pausing</b> 2:21 <b>pending</b> 201:17 <b>penetrate</b> 203:17 204:10 <b>penultimate</b> 197:9 205:1 <b>people</b> 5:14 6:19,23 10:11,20,24 57:23 74:2,6,23 89:19 106:4 122:7 142:1 158:17 165:4 179:9,23 181:10 201:5 211:10 214:15 215:22 217:4 218:2 <b>perceive</b> 140:22 <b>perceived</b> 138:7 144:18 210:10 <b>perfectly</b> 162:1 <b>period</b> 50:22 97:23 149:15 150:16,22 150:24 187:22 188:15 <b>peripheral</b> 139:17 <b>persevere</b> 150:20 <b>person</b> 28:6 86:24 87:1 89:13,16 111:25 189:22 204:15,18 <b>personal</b> 75:4 210:3 <b>persons</b> 68:17 88:12 151:3 <b>perspective</b> 21:18 137:19,22 216:5 221:1 <b>Pete</b> 144:13 <b>PFOA</b> 4:11,19,21 5:4,7,22 7:4 117:22 118:10,14 118:18,25 119:10 <b>phases</b> 48:23
--	--	---	---	--



<p><b>phone</b> 211:10,10  <b>photographic</b>  30:10  <b>phrase</b> 26:6,8  31:12  <b>physically</b> 127:18  127:22 128:6,10  162:11 171:4  <b>picture</b> 22:25 24:10  24:12 43:6,15  44:23 68:2 152:7  173:4 179:22  214:14,24 215:2,4  218:7  <b>pistol</b> 81:9 84:14  <b>place</b> 50:25 100:11  120:21,22 202:9  <b>placed</b> 96:10 171:5  <b>places</b> 217:25  <b>plainclothes</b> 59:16  <b>plainly</b> 162:19,23  193:16  <b>plan</b> 34:6,19 59:18  61:25 62:15,22,23  65:4 67:4,7 70:16  76:18,24 77:8,10  77:15,25 123:11  123:14,19,24  154:16 167:19  173:2,2,15,16,20  174:4,9,10,10  192:13,13 193:16  199:20  <b>planned</b> 173:24  174:1  <b>planning</b> 33:9,24  47:10 48:22 168:1  172:23,24 173:6  173:23  <b>plates</b> 181:7  <b>platform</b> 187:4  219:12  <b>play</b> 54:7,12  <b>played</b> 54:3  <b>playing</b> 220:2</p>	<p><b>please</b> 2:2 11:25  19:6,7 21:24,25  25:14 27:2,14  31:25 32:12 35:2  36:10 40:6 45:4  46:18 52:4,5  58:22 68:9 71:22  78:25 86:4 91:5  94:14 95:24 98:13  102:9 103:5 104:3  107:16 108:22,22  108:23 109:8  110:3 115:21  133:5,6 136:15  144:10 150:13  164:3 168:19  170:14 172:4  182:9 191:16,20  193:18 195:23  205:5 206:20  211:4,12,16,20  219:13  <b>plot</b> 72:8,22  <b>plus</b> 74:6 85:11  <b>pm</b> 12:20 13:9,10  13:24 14:12 58:8  59:1 64:2 116:17  116:19 168:8,10  192:16 193:4  221:7  <b>point</b> 11:20 17:18  25:10 39:8 44:10  46:24 62:14 64:11  67:3 76:6,8 81:2  84:18 88:14 90:2  95:1 100:6 101:9  104:25 112:15  125:9 126:11  130:8,13 140:2  157:5 159:2,4  170:4,22 175:10  176:25 185:8  192:12 195:2  196:18 199:4  200:20 203:7</p>	<p>204:4,12,13 205:1  213:19  <b>pointed</b> 87:15,17  <b>pointing</b> 64:10  84:12 145:15  162:7,17  <b>points</b> 74:6 130:7  130:15,17,23  161:1  <b>police</b> 4:5 11:8 13:1  13:5,10 21:3  45:25 46:6,23  48:25 49:3 52:1  52:10 53:6 54:2,5  54:11 56:4 58:22  59:2,15,17 89:10  105:4 106:4 113:3  113:21 118:6  121:25 125:16,18  129:7 140:16  155:14,18 156:16  160:2,4,10,12,19  161:10,12 178:13  183:7,10,16  196:15,22 198:10  198:13 209:20  <b>policing</b> 190:11  <b>policy</b> 147:11,12,14  148:2,2,6 156:16  157:7  <b>pop</b> 182:6  <b>port</b> 84:9,11  <b>posed</b> 102:7 109:25  112:13 140:20  144:5 172:8  205:20,25 207:21  208:18  <b>position</b> 32:1,4  57:11,17 64:6  67:16,21 78:5,23  78:25 79:10 84:9  88:20 91:13  100:17 103:16,19  103:22,25 104:16  104:17,21,24</p>	<p>109:8 110:9,14,18  110:24 111:22  124:6 125:15  126:25 127:2  131:24 132:21  135:14 136:1  144:17 146:7  153:25 155:12,12  155:22,25 156:8  157:6 163:8  172:15 174:6  176:8,18,24 177:8  177:14 195:17  200:15 201:8,23  201:23 206:3,11  207:24 212:4,5,6  213:5 218:10  <b>positioned</b> 124:3  127:18 145:12  174:7  <b>positioning</b> 134:4  134:11 135:19  <b>positions</b> 59:6  134:8 183:19  217:4  <b>possession</b> 35:7,16  40:4,14,15,18  41:12 178:24  179:18 214:8  <b>possibility</b> 165:16  165:18 191:1  220:21  <b>possible</b> 20:12,17  203:11  <b>possibly</b> 3:21 13:3  14:2,2 38:25 41:9  49:5 55:21 62:17  65:9 105:22  110:24 111:10  135:1 136:7 164:5  209:4  <b>post</b> 5:5,23 7:3  <b>post-incident</b> 114:5  114:14 115:4  117:9 119:3,8,11</p>	<p>119:20 188:25  <b>postures</b> 134:14  <b>potential</b> 138:14  165:6 192:10,25  <b>potentially</b> 71:9,18  71:19 72:16 74:9  74:11,13,24,25  75:12,13 98:23,24  157:1 165:1  174:13 176:12  184:15 213:24  217:23 218:4,5  <b>powered</b> 181:6  <b>powerful</b> 145:18  <b>PowerPoint</b> 18:25  20:24 22:1 23:8  30:20 31:1 33:14  34:3 51:7 149:14  191:18 192:8  <b>PowerPoints</b> 19:23  49:13,14  <b>PPE</b> 79:15 80:1,3  <b>practical</b> 8:2  <b>practice</b> 105:3  <b>practices</b> 217:2  <b>practise</b> 183:5  <b>practised</b> 217:15  <b>pre-determination</b>  45:14  <b>pre-determined</b>  187:6  <b>precise</b> 66:22 75:23  <b>precisely</b> 30:4  203:8  <b>preferred</b> 88:19  <b>premises</b> 33:8,13  33:15,18,20,23  34:2 55:21 193:1  193:6,15 202:20  <b>premium</b> 217:25  <b>preparation</b> 180:14  215:11,14  <b>preparations</b>  180:19  <b>preparatory</b> 48:23</p>
--	---	---	---	---

<b>prepare</b> 68:13	173:18 190:10,11	209:16	131:1,2 133:11	<b>questioning</b> 122:22
<b>prepared</b> 3:23 19:3	<b>privacy</b> 60:11 61:1	<b>prosecution</b> 41:19	134:7 135:3 137:9	<b>questions</b> 1:23
<b>preparing</b> 68:18	61:13,20 62:2,11	<b>protect</b> 172:10	137:9 142:15	36:14 115:18
181:11	62:21 174:14,15	202:5	152:12 156:11	116:3,20,22
<b>presence</b> 16:19	174:20 175:14	<b>protection</b> 74:14,17	161:1,7,9 163:8	119:12 122:13
<b>present</b> 18:10,16	<b>private</b> 7:1	201:5,10,13	165:10 171:23	144:9,11,13
48:8 71:25 89:3	<b>probability</b> 165:16	<b>protective</b> 210:9	172:9,22 174:8	147:23 178:10,12
<b>presentation</b> 19:1	<b>probably</b> 4:14 7:24	<b>protruding</b> 85:13	176:7 182:20	178:18 184:1
20:24 34:4,4 51:7	8:10 12:14 13:9	145:16	187:10 192:12	190:8 191:16
149:14 191:18	14:6,18 16:7 50:4	<b>proud</b> 85:16	199:11 201:3,18	205:3 206:17
<b>presented</b> 19:12,14	50:11 56:9,15	<b>provide</b> 9:19 62:24	202:1,11 218:22	211:22 213:7
21:21 189:14,20	84:16 85:15 87:11	67:21 77:16 88:6	<b>puts</b> 137:7,15	214:4 217:1
209:1 210:20	97:19 109:20	113:15	<b>putting</b> 50:11 51:6	220:14,22 222:6,7
<b>presenting</b> 107:13	128:24 130:21	<b>provided</b> 5:23 6:10	68:17 135:6 161:3	222:8,9,10,11
<b>presents</b> 186:17	147:12 185:19	10:16 18:6 78:11	166:24 169:5	<b>quibble</b> 118:1
<b>pressed</b> 84:20	186:10,15 187:12	119:6,23 158:3	172:14 173:19	<b>quibbling</b> 172:11
<b>pressel</b> 87:6 123:22	<b>probe</b> 116:7	188:5 218:21	214:6,20	<b>quick</b> 141:17
<b>Preston</b> 23:2 26:20	<b>problem</b> 1:6 160:24	<b>provides</b> 134:17		<b>quickly</b> 67:12
28:16,21 30:24	161:3 165:6,6	<b>providing</b> 218:23	<b>Q</b>	76:12 103:8
43:16,17 180:17	<b>problems</b> 160:24	<b>proximate</b> 76:11	<b>Q9</b> 1:10,20,21,24	<b>quiet</b> 211:1,2,4,20
181:2 190:20	<b>procedure</b> 114:5,15	<b>PSB</b> 8:7,16,24	21:25 52:25 57:1	<b>quite</b> 4:1 56:17
215:22	115:4 119:3,9,20	<b>pub</b> 16:6	57:10 94:15 109:8	109:13 110:24
<b>presumably</b> 20:3	171:15 188:25	<b>public</b> 11:21 15:10	115:18,21 116:23	111:9 115:1
62:2 205:12	197:11	66:25 71:11,18,20	118:21 133:10	130:23 136:7
<b>presume</b> 50:1 70:8	<b>process</b> 11:4 14:3,4	141:9 153:23	140:13 178:11	148:14 178:9
<b>presumed</b> 8:24 9:2	14:14 16:25 42:18	209:13	179:10 211:23	185:2,10 209:4
9:3 193:4	117:13 146:20	<b>pull</b> 158:17	220:18 221:4	218:15
<b>pretty</b> 83:10 158:19	147:8 155:11	<b>pulled</b> 57:20 127:1	222:5	
189:7	165:14 172:16	<b>pulls</b> 124:1	<b>qualified</b> 220:11	<b>R</b>
<b>prevent</b> 204:15	173:10 209:8,11	<b>punctuation</b> 109:2	<b>quality</b> 186:12	<b>radio</b> 65:11 66:15
<b>preventing</b> 127:18	209:24 216:23	<b>purely</b> 119:1	<b>quantities</b> 199:16	70:3 84:3 123:22
<b>previous</b> 23:10,11	<b>produced</b> 10:4,6	120:24	<b>quantity</b> 199:15	124:16
23:12 34:11,16,19	<b>Professional</b> 8:16	<b>purpose</b> 27:5,9	<b>quarter</b> 148:21	<b>rained</b> 83:20
43:12 48:20 60:10	<b>programme</b> 160:6	167:11	<b>question</b> 10:11 37:7	<b>raining</b> 83:20
60:14,18,23 61:15	<b>progress</b> 168:23	<b>purposes</b> 160:16	44:17 57:12 95:3	<b>raise</b> 119:16
61:18 71:24	<b>promote</b> 184:20	189:9	98:14 104:4 109:5	<b>raised</b> 6:8 51:25
150:14 180:15	<b>proper</b> 28:3 144:3	<b>put</b> 10:13 13:3	110:4 118:21	89:21,22 97:7
185:19 194:21	<b>properly</b> 123:21,22	17:10,11 21:22	120:3 121:6,7	119:15 129:19
198:24 215:21	189:9	44:24 45:15 52:4	122:2 123:20	130:2,4 202:10
<b>previously</b> 36:13	<b>proportion</b> 187:8	71:19 72:16 75:23	128:5 133:11	<b>raising</b> 47:2 119:20
39:5 44:13 68:21	<b>proportioned</b>	78:20 80:3,5,22	136:6 165:10	<b>rank</b> 8:10
<b>principal</b> 4:12 6:15	169:13	84:2 90:20,22	179:19 195:11	<b>rapidly</b> 164:9
<b>principles</b> 184:20	<b>propose</b> 220:18	92:14 98:20 99:11	197:25 207:9	<b>rationale</b> 73:16
184:23,24	<b>proposition</b> 208:3	112:7 113:18	209:21	179:25 214:5,16
<b>prior</b> 95:6,16	<b>prosecuted</b> 120:18	123:1,4 129:9,10	<b>questioned</b> 203:23	<b>Raven</b> 15:10,16

63:15 66:25	135:17 137:3	<b>recreation</b> 198:21	188:10	<b>rephrase</b> 44:19
<b>reach</b> 208:10	144:20 161:11	<b>red</b> 12:21 16:2,6	<b>relative</b> 203:8	<b>replaced</b> 151:8
<b>reached</b> 162:19	167:23 202:16	59:22 60:4,7	206:3	216:23
177:25 191:11	<b>reasonable</b> 162:1	61:13 63:4 68:16	<b>relatively</b> 194:21	<b>report</b> 133:8,23
200:19	<b>reasonably</b> 76:10	78:17,20 86:19,19	<b>relay</b> 69:20,24	134:4
<b>reaching</b> 96:7	193:3	86:21 124:10	<b>relayed</b> 68:4	<b>reported</b> 134:16
142:2,4 177:12	<b>reasoning</b> 195:9	126:4 127:15	<b>release</b> 220:20	<b>repositioned</b>
178:3 202:25	<b>reasons</b> 8:2 74:21	134:7 142:16	221:5	183:15
<b>react</b> 94:22 164:24	109:18 185:2	192:17 195:3,3	<b>released</b> 220:23	<b>representative</b> 2:12
186:19	214:25	201:6	<b>relevance</b> 96:25	17:11 18:8 115:13
<b>reacted</b> 96:22	<b>recall</b> 2:10 8:19	<b>reduce</b> 199:18	119:8	<b>representatives</b>
<b>reaction</b> 165:8	11:18 14:8 30:17	<b>redundant</b> 112:12	<b>relevant</b> 54:6	118:10,11
186:5,12,24	30:23 31:2 33:14	136:12 163:2	<b>reliable</b> 20:12	<b>representing</b>
<b>read</b> 23:5 63:23	33:19 52:8 56:5	165:5	31:18,19 37:6	116:24
102:10 108:5,11	58:11,21 64:8,24	<b>refer</b> 180:18,18	39:6,13,15,16	<b>reps</b> 118:6
133:25	65:13 80:18 82:6	181:1,4	<b>relied</b> 11:18	<b>required</b> 7:7
<b>reading</b> 114:13	82:16,24 95:12	<b>reference</b> 22:9,17	<b>rely</b> 11:15 46:17	<b>requires</b> 76:3
169:22 207:1	114:13 151:8	22:18 31:3 179:2	<b>remain</b> 111:12	<b>requiring</b> 189:20
<b>reads</b> 22:12 26:17	188:4	<b>referred</b> 181:20	160:2 186:2	<b>research</b> 19:11,22
109:18	<b>recalled</b> 27:6,18	196:24	<b>remainder</b> 56:3	<b>resources</b> 21:3
<b>ready</b> 20:25 21:11	<b>rece</b> 34:1 180:24	<b>referring</b> 47:18	<b>remember</b> 3:17	<b>respect</b> 102:25
100:11 127:2	202:19,20	48:7	4:12 28:2 30:12	171:10 176:9
168:18	<b>recces</b> 32:7 180:21	<b>reflecting</b> 24:4	30:25 34:17 49:19	182:13
<b>reaffirmed</b> 14:18	180:23 194:12	<b>regarding</b> 43:12,15	50:8,10 51:22	<b>respecting</b> 141:13
<b>reaffirms</b> 43:9	215:15	49:21	54:25 56:2 62:19	<b>respectively</b> 190:1
<b>real</b> 165:13,16	<b>receive</b> 56:1 58:8	<b>Regardless</b> 210:13	65:12,16,18 67:2	<b>respirator</b> 79:12
<b>realised</b> 67:12	58:12,19	<b>region</b> 22:14	68:5,6 69:19,23	80:7
103:8 107:10	<b>received</b> 21:9,12	<b>registration</b> 15:2	70:15 83:18,21	<b>respirators</b> 68:18
127:11	54:19 55:15 58:1	16:5	88:17 95:19 106:6	79:16
<b>realistic</b> 210:7	58:14 60:20 63:20	<b>regular</b> 56:17	114:4,9 118:7	<b>respond</b> 204:21
<b>really</b> 14:8 41:13	66:5 99:13 152:6	186:4	120:5 123:16	<b>responding</b> 170:6
65:3,4 69:9 77:22	173:4 178:20	<b>regularity</b> 183:6	126:10 133:16,20	<b>response</b> 184:12
109:13 138:6	180:20 192:9	<b>rehearsal</b> 77:10,13	135:3,6 182:23	208:13
166:22 177:20	<b>receiving</b> 61:14	<b>rehearsals</b> 217:2,10	196:23	<b>responsibilities</b>
211:19	<b>recognise</b> 18:1	<b>rehearse</b> 77:14	<b>remembered</b> 11:16	141:8
<b>rear</b> 59:9,9 62:25	128:23	196:4	12:6,8 23:11,14	<b>responsible</b> 26:19
63:22 67:13,22	<b>recollection</b> 13:18	<b>reinforce</b> 216:8	30:15,16 52:1	28:16,20
69:8 79:5 81:3	66:9 76:14 80:23	<b>relates</b> 149:7	106:14	<b>rest</b> 22:22 68:5
83:16 104:10,13	109:7 182:16	<b>relating</b> 16:21	<b>remind</b> 57:12 116:5	85:5 86:7 149:5
105:9 112:21	<b>reconstruction</b>	182:14 190:20	185:23	173:15 191:21
124:3 201:4	198:25 199:2	<b>relation</b> 7:1 11:13	<b>remit</b> 5:5	207:12 208:16
218:20	<b>recording</b> 9:22	17:3 28:10 42:2	<b>removed</b> 159:14	<b>restaurants</b> 83:16
<b>reason</b> 3:13 110:11	47:22 220:16	48:17 120:17	211:18	<b>restricted</b> 167:4
124:21 125:5,13	<b>recordings</b> 49:15	128:5 141:5,16	<b>rep</b> 92:6	<b>result</b> 41:16,17,19
126:12 129:14	<b>recreated</b> 134:7	178:20 183:7	<b>repeat</b> 118:21	<b>resulted</b> 24:1

<b>results</b> 134:3	150:10 151:5,16	191:9 198:20	<b>rotate</b> 183:16	<b>Save</b> 159:1
<b>reticule</b> 86:18	152:3 153:4,10	202:13 215:6	<b>round</b> 10:23 57:20	<b>saw</b> 91:9,17 93:10
<b>return</b> 1:11 158:24	156:10 159:24	<b>robbers</b> 214:22	74:5 75:11 76:22	96:3 110:15,19
197:9	161:18 163:4,16	<b>robbery</b> 19:4,15,24	83:9 86:19 96:11	111:17 112:4
<b>reverted</b> 77:5	164:23 165:20	20:4 22:17 23:1,9	104:12 110:2	113:6 139:25
<b>review</b> 201:3	166:24 167:2	24:11 26:19 28:16	113:3 115:22	141:20 166:25
<b>reviewed</b> 185:7	169:19 173:3	28:20 30:24 31:9	138:24 140:23	176:16 202:25
<b>revisited</b> 206:20	178:9,21 184:8,11	36:3 42:24 43:16	145:1 168:14	205:21 208:11,23
<b>rich</b> 33:21	184:12,21 185:3	46:9,21 47:5	180:15 201:8	211:23 213:4
<b>right</b> 2:4,9,15 4:22	188:1,10,13 190:7	48:12,13 49:2,24	203:20 204:10,15	<b>saying</b> 6:9 9:7
5:12,18,25 6:16	191:6 192:5,15	50:24 51:9,23	204:19 210:17	17:19,21 19:11
8:11,16 10:1	193:11 194:17	52:2,22 53:1,9,10	<b>roundabouts</b>	24:5 35:13 36:2
14:19,23 17:8	195:20 199:3	53:19 54:1,11	152:10	52:11,24,25 53:8
20:3 25:2 27:7,22	202:22 205:5	58:6 65:6 179:24	<b>rounds</b> 204:1	53:9,12,13,17
32:2,21 33:2,5,21	208:21 219:10	179:25 190:20,21	<b>route</b> 72:17	54:15 72:15,19
35:18 43:20 46:1	<b>right-hand</b> 15:14	190:24 191:2	<b>row</b> 73:18 83:16	73:6,8,10,13
46:25 47:3 52:24	66:17 179:10	192:18 196:19	<b>rules</b> 122:24 184:23	108:3 109:17
56:11 57:25 59:18	191:21	198:25 199:12	<b>run</b> 78:8 158:16	114:16 131:5
63:15 64:2,7 67:4	<b>Rimmer</b> 39:22 42:2	200:15,22 202:14	184:24	132:11 136:25
71:4 76:19,22	42:9 58:9 126:19	214:16,17 216:10	<b>running</b> 78:3 82:23	139:20 151:17,23
77:8,10 78:18	199:7	216:17	201:8	152:19 154:10
79:8,16 80:20	<b>Rimmer's</b> 43:22	<b>Robert</b> 58:9	<b>rushed</b> 21:7	156:15 157:8,11
81:9 83:13,22	<b>rings</b> 4:20	<b>Rodney</b> 121:18,21	<b>Russell</b> 18:12	158:8 166:5
84:13,14 86:2,22	<b>risk</b> 47:7 49:6,8,10	121:24 209:11	<b>Ryton</b> 154:23	193:22
86:23 87:19 90:15	49:16,20,25 50:6	<b>role</b> 69:6 77:5		<b>says</b> 12:5,9,18,25
91:3,9,17,20,23	50:9,15 51:11	108:20 112:12	<b>S</b>	15:15 28:14,18
93:6,7,10,19 94:3	71:20 89:3 101:21	145:6,21 151:3	<b>safer</b> 74:1	29:2,5,8,14,19
94:6,12,12 95:5	101:23 144:21	152:1,2 154:5,11	<b>safest</b> 71:12,16	36:12 55:5 72:2,6
95:10 96:4,15,19	171:15 176:3	154:12 158:1,5	72:11 73:2,11,24	73:1 91:21 93:9
96:25 97:14,15	199:14,18 201:18	163:2 165:5	74:22	109:22 129:17
98:2,7 99:25	210:10 212:3,19	183:11,12 185:4	<b>safety</b> 141:8,11,13	131:1 133:24
108:23 109:3,15	213:5,8	212:25	<b>Sainsbury's</b> 54:21	137:16 221:2
116:10,13 120:6	<b>road</b> 13:10 15:11	<b>roles</b> 156:14 157:12	55:22,22 63:22	<b>scale</b> 11:6,7 169:15
121:3 123:15	15:16,20 66:25	157:13 183:16	180:15,24 181:4	170:20 209:19
124:1 126:24	152:9 153:14	217:5,17	192:5,8,10,12,18	<b>scant</b> 11:16
128:7,10 129:5	154:1	<b>roll</b> 208:11	193:7,16 194:3,4	<b>scenario</b> 149:20
130:11 131:24	<b>roads</b> 72:18,20	<b>rolled</b> 182:17	194:18,25 195:7	150:9,10 217:6,20
132:13,13,25	<b>roadway</b> 157:23	<b>roller</b> 120:14	200:16 215:11,14	217:24
133:19 134:10,25	<b>rob</b> 195:7	<b>rolling</b> 157:15	216:2,6,11,17	<b>scenarios</b> 156:20
135:6,19 137:13	<b>robberies</b> 22:14	<b>room</b> 1:11 7:24,25	<b>sake</b> 78:2	183:14
137:16,20,24	24:20 25:1 38:3	9:12,25 10:8,16	<b>sat</b> 51:25 56:5 79:2	<b>scene</b> 70:7 134:3,7
138:1,2 141:13	42:20,20,22 43:4	11:11 26:23 29:13	106:15,16 131:25	134:12 188:22
142:21 143:18	43:6,7 44:14	29:16 55:22 182:7	132:7 218:20	191:2 198:14
145:8 147:13	47:10 48:23 180:5	216:2,6	<b>Saturday</b> 192:22	<b>SCHOFIELD</b>
149:12,22 150:2,6	180:5 190:19,24	<b>rooms</b> 11:9	196:8	108:21 210:25

211:2,5,8,15	99:9 101:14	<b>sentence</b> 22:12 23:5	27:22 55:16	48:20 49:4 151:11
<b>scientific</b> 134:16	102:23 103:1	24:11,19 25:25	101:19 111:10	183:11
<b>scope</b> 134:21,22	106:10,21 107:3	28:13 39:3,24	122:7 132:18	<b>shotgunner</b> 156:9
<b>scratch</b> 21:5	107:15,17 110:20	<b>separate</b> 5:15 37:7	175:18 208:13	<b>shoulder</b> 85:8,9
<b>screaming</b> 181:21	110:21,22 111:23	47:20 119:25	209:5	<b>shoulders</b> 106:11
<b>Seaman</b> 133:9	111:25 112:3,4,10	120:3 170:24	<b>shooter</b> 121:21,21	<b>shout</b> 83:24 89:16
<b>seat</b> 62:25 67:13,22	112:13,15 113:5	<b>sequence</b> 177:23	121:24	105:5,9 113:9
68:23 69:7,8 79:2	116:2 124:12	<b>sergeant</b> 11:4	<b>shooting</b> 4:13 118:9	158:5 159:14
79:7 82:3 88:16	126:11 127:5,19	<b>sergeants</b> 199:1	149:19 150:23	176:24 177:8
90:6 94:24 97:7	127:23 129:9,23	<b>series</b> 161:1	151:7 156:17	<b>shouted</b> 89:8,13,13
104:9,10 106:8,10	130:1,3,11 131:1	<b>serious</b> 44:3,4,9	171:10 186:11	98:22 105:24
106:15,16 113:8	131:7 132:4 133:2	180:5,8	197:6 208:25	129:13,17 158:13
125:23 132:7	133:4,23 135:21	<b>served</b> 39:23	209:11,11 210:1	<b>shouting</b> 181:24
202:10 205:16,21	135:23 136:1,3	<b>service</b> 113:22	213:16	182:1
<b>seating</b> 78:23,25	137:1,21,23 139:1	<b>services</b> 6:2 118:19	<b>shootings</b> 209:20	<b>show</b> 57:13 89:10
<b>seats</b> 78:14 89:19	139:13,14,17,20	118:24	<b>shopping</b> 192:3	98:22 111:3 129:7
<b>second</b> 3:15 22:3	139:23 140:4,25	<b>session</b> 186:10	193:11	139:10 149:13
26:11 28:13 32:24	145:4 146:23	<b>set</b> 17:4 27:6 30:4	<b>shops</b> 83:16	169:8
55:5 67:6 72:3	156:22 161:23	30:19 34:2 38:16	<b>short</b> 1:17 57:4	<b>showing</b> 149:20
86:15 91:6,8	162:20,21 164:4	42:23 64:23 125:1	126:11 149:4	153:25 184:11
94:19 97:3,8,13	165:24 167:5,7	125:8,17,19,24	168:9 196:5	<b>shown</b> 23:7 33:20
102:10,11 115:21	171:1,3 177:13	153:7,13 184:20	<b>shortly</b> 173:13	<b>shut</b> 193:4
130:13 143:23	178:11,15 179:11	187:14 196:13	198:24 218:1	<b>side</b> 11:23 15:14
189:24 215:9	179:19 182:2,3,13	205:8 214:4	<b>shot</b> 15:11,16,23	21:22 60:11 61:2
<b>Secondly</b> 109:21	202:16 205:16,18	217:21 218:16	89:15 93:13,25	61:22 62:3,11,21
161:14 214:3	205:24 207:5	<b>sets</b> 125:17	94:1 95:7,10,16	66:17 80:13 83:11
<b>seconds</b> 97:9,19	208:9,10 212:9	<b>seven</b> 186:1,2	97:2,18 98:4	112:17 120:25
98:1 107:19 127:7	214:6,13	<b>seven-page</b> 3:9	103:1 106:13	128:7,8 156:11,24
130:21,24 131:4	<b>seeing</b> 128:11 149:6	96:23	107:20 110:1	159:6 174:15,21
201:2	164:22	<b>SFO</b> 186:14	127:8 129:22	177:17 182:7
<b>secure</b> 194:3	<b>seek</b> 98:7	<b>shadow</b> 167:10	135:1,22 136:20	217:7 218:16
<b>secured</b> 170:3	<b>seeking</b> 24:4	<b>shape</b> 217:10	137:1 138:18,21	<b>sides</b> 61:13,20 62:7
171:6	<b>seen</b> 14:17 27:11	<b>sharp</b> 87:22	139:3,6,16 140:19	217:18
<b>see</b> 12:9,18 13:7	54:20 55:8,9,23	<b>shattered</b> 131:9,11	140:21,24 141:2	<b>sight</b> 86:17 104:18
16:1 22:3 28:5	98:4,7,10 99:16	135:5	141:20,23 142:11	176:22
29:24 30:22 39:22	99:18 139:13	<b>Shaw</b> 1:3 57:1	143:12,15 144:17	<b>sighting</b> 85:24,25
40:11 42:2 45:9	149:5 161:20	115:22 168:13,16	144:21,25 147:6	86:5,15
47:22 48:2,9,14	163:20 177:24	<b>sheet</b> 193:13	172:18 176:14	<b>sights</b> 86:6,7,8,8
49:12 62:7,8 65:5	194:1,7,8 208:18	<b>shining</b> 90:10	178:2 201:24	<b>sign</b> 92:11
65:8 72:3 74:9,12	<b>sees</b> 125:23 137:8	<b>Shire</b> 49:7 50:2,12	202:3 207:4	<b>signed</b> 92:8
78:15 81:21 82:1	137:17	51:2 52:17 60:19	208:15 209:3	<b>significant</b> 39:1
82:4,7,11,14 83:3	<b>sense</b> 80:3,5 87:10	189:22 190:10	211:17 213:5,12	44:15 59:2 188:14
87:14,15 88:11	114:16 140:13	196:9	<b>shotgun</b> 26:22 29:7	<b>signs</b> 82:23
89:23 90:6 91:13	213:16,17	<b>shock</b> 147:18 148:9	29:9 40:4,14,15	<b>silhouette</b> 113:7
91:16 95:8 96:1	<b>sensitive</b> 122:8	<b>shoot</b> 15:20,23	40:19 41:12 46:23	<b>similar</b> 7:25 21:11

30:7 110:4 134:8 155:23 <b>simply</b> 116:10 141:23 153:4 156:17 157:12 158:8 166:20 182:21,22 196:1 <b>Simpson</b> 114:10 <b>simultaneously</b> 159:14 <b>SIO</b> 33:25 <b>sir</b> 1:5,22 2:5,10,25 3:2,7,10 4:16,18 4:23 5:1 6:17,21 6:25 8:3,18,21 9:16,23 10:2,5,15 10:19,22 11:1,6 14:11 15:7,24 16:11,15 17:17,25 18:7,9,15,20 19:5 19:8,20 20:6,10 20:13 21:2,17,20 22:2,16 23:15,19 23:24 24:3,7 25:3 25:6,10,10,13,20 25:22 26:9,15 27:1,8,13,17,19 27:23 28:2,4,8,11 29:23 30:3,9,11 30:17,21 31:2,6 31:14,23 32:3,5 32:11,22 33:3,6 33:11,22 35:4,12 36:4,6,9 40:20 41:6,8,22 42:25 43:21,24 44:16 45:3,5,10,19,21 45:23 46:2,10,12 47:1,4,17,24 48:1 48:4,6,8 54:22,25 55:2,4,17,24 56:9 56:12,20,21 57:9 57:18 58:11,13,18 59:5,16,24 60:9 60:13 61:3,6,10	61:16,22 62:1,4,6 62:9,19 63:1,10 63:16,18,23 64:3 64:5,14 66:8,11 66:21 67:2,5,23 70:4,19 71:23 72:1 76:20 77:18 77:23 78:9,19,22 78:24 80:8 81:1,7 81:16,20,23,25 82:3 86:10,14 87:16,20,25 88:5 88:17,21 89:2,4 90:5,8,16 91:12 91:15 97:16 98:3 103:11 108:5 109:9 112:9 113:25 114:6 115:17,18 116:21 117:9 118:12 122:15 126:10 133:25 137:6,11 143:23 144:7 146:22 150:13 157:10 159:19 161:17 163:21 164:14,21,24 165:9,12,18,23 166:23 167:3,25 172:22 183:24 184:7,22 185:5 187:25 188:3,24 189:4,11,18,23 190:2,6,13 191:14 191:19 192:1,6,19 193:2,8,14,17,20 194:16,23 195:1 195:25 196:6,11 196:20,23 197:1,4 197:7,12,15,17,22 197:24 198:3,7,11 198:16,22 199:10 199:17,19,24 200:4,7,11,17 203:1,3,6,13,16	203:25 204:23 205:4,14 206:25 207:19 208:4,6,20 208:24 209:2,10 209:15,18,22 210:12,14,16,19 210:23 211:24 212:2,5,8,10,12 212:21 213:11,14 214:2 219:8,20 220:14,16 221:6 <b>sit</b> 113:24 211:4 <b>sitting</b> 53:7 59:7 73:18 88:20 135:14 138:2 <b>situation</b> 78:1 105:23 141:19 153:2 156:22 199:21 200:19 201:2 <b>situations</b> 106:2 184:9 185:14 <b>six</b> 3:11,16 30:12 48:19 72:6 117:18 175:5 208:7 <b>size</b> 7:25 <b>skeleton</b> 85:8 <b>skin</b> 100:23,25 203:17,19 <b>Slater</b> 18:14 <b>sleep</b> 56:8 188:14 188:18 <b>slide</b> 149:21 170:14 192:2 193:10,15 <b>slides</b> 151:1,4 216:15 <b>slightly</b> 57:23 81:16 106:11 130:22 135:1 145:16 168:11 <b>sling</b> 85:12 <b>slumped</b> 94:24 106:8 <b>slumping</b> 106:9 <b>small</b> 87:5	<b>smaller</b> 182:6 <b>smash</b> 112:5 158:17 <b>smashed</b> 108:9 <b>smock-type</b> 59:11 <b>so-described</b> 187:15 <b>social</b> 122:3 <b>solely</b> 54:13 <b>somebody</b> 8:9 14:13,20 41:10 50:10 51:9 57:20 78:11 110:7,12 128:25 153:25 188:23 207:16 212:19 216:7 <b>somebody's</b> 24:1 <b>son</b> 211:3,17 <b>soon</b> 84:9 145:25 163:1 165:4 177:15 204:13 <b>sophisticated</b> 176:18 <b>sorry</b> 1:6,10 3:23 5:1 8:21 16:3 22:21 40:24 44:19 47:12,24,25 69:3 69:16,22 76:7 80:4 95:5 108:13 113:1 121:6 128:13 137:6 140:21,24 143:23 154:18 159:19 164:19 168:2 204:7 220:7 <b>sort</b> 1:13,14 5:23 6:1,2 19:16 44:12 44:24 56:6,17 68:13 75:20 89:25 97:23 105:8 114:4 120:13 121:8 153:8,11 154:22 171:9 175:24 202:13,15 211:13 218:8	<b>sorted</b> 1:8 <b>sorts</b> 123:11 184:6 <b>sound</b> 2:8 62:22 64:2 105:15 <b>sounds</b> 118:11 122:6 <b>source</b> 39:6 <b>space</b> 64:7,10 <b>speak</b> 34:16 38:9 113:20 114:21 115:9,12 117:15 184:11 195:17 199:22 <b>speaking</b> 25:15 26:3 27:14 113:23 <b>special</b> 151:12 156:10,15 158:4 <b>specific</b> 32:9 35:6 35:15 36:15 48:17 151:3 152:1,2 156:14 157:13 158:1 178:23 195:23 216:13,16 218:15 <b>specifically</b> 122:24 183:11 195:3 <b>speculation</b> 101:1 <b>speculatively</b> 203:14 <b>speed</b> 81:14 93:3,4 94:7 <b>split-second</b> 186:18 <b>spoken</b> 51:9 <b>sponsor</b> 19:3,24 <b>sponsors</b> 19:16 <b>Spotter</b> 126:6 <b>spotters</b> 126:5 <b>spray</b> 143:4 <b>staff</b> 26:21 29:1,4,6 29:12 <b>stage</b> 3:6 6:14,15 27:10 56:24 57:12 77:1 111:15,25 119:13 150:21 168:6
---	---	---	---	--

<b>stages</b> 50:21	197:2,5,13 198:12	<b>stopped</b> 81:17 84:9	<b>students</b> 183:16	181:6 190:12
<b>stand</b> 108:16	202:11 205:5	89:6 127:8,12	<b>stuff</b> 10:20 160:4	191:5 192:11
110:17	<b>statement-taking</b>	142:22 145:17	186:16 202:13	193:25 195:7
<b>standard</b> 217:3	11:4	154:13 216:20	<b>subconsciously</b>	199:6 200:2,5
<b>Standards</b> 8:16	<b>statements</b> 6:10	<b>stopping</b> 84:7	14:18	<b>subjects'</b> 23:12
<b>standing</b> 129:11	7:13,16 9:6,19	97:17 128:10	<b>subject</b> 15:9 45:8	63:21
<b>stands</b> 72:9	10:9,11 11:9,12	<b>stops</b> 152:23	45:13 48:18,22	<b>subsequent</b> 55:16
<b>start</b> 18:21 35:11	77:20 119:6,24	153:17 156:19	55:9 58:14 61:23	169:8,9
51:5,6 56:16 57:2	<b>static</b> 67:21 78:5	159:3 183:5 184:6	75:3 78:4 81:22	<b>subsequently</b> 55:25
68:10 94:19 117:1	<b>station</b> 13:1,5,11	204:19	82:9 87:13 88:10	61:24 114:24
144:16 184:2	45:25 46:6 52:1	<b>store</b> 192:21	94:9 112:23,24	115:16 160:1
206:24 212:5	52:10 53:6 54:6	<b>straight</b> 79:4,4	145:13 147:7	178:1
<b>started</b> 10:8 67:7	56:4 58:22 59:17	132:1 135:14	151:15 152:8	<b>subset</b> 75:20
112:19 146:1	125:16,18 196:15	166:16	153:20 158:17	<b>substantial</b> 26:24
150:3 172:16	196:22 198:10,14	<b>strand</b> 147:21	159:6,12 168:21	29:18,21
189:12 205:22	<b>stations</b> 11:8	<b>street</b> 83:8,12	169:24 170:3,8,15	<b>substitution</b> 150:17
<b>starting</b> 16:18 21:5	<b>stay</b> 62:24 67:19	152:11 154:14	171:1,3,6,12	<b>successfully</b> 220:12
32:15 155:12	77:15 106:16	<b>stressful</b> 185:14	172:18 183:8,15	<b>sudden</b> 91:3 92:19
157:5	108:20 151:16	<b>strictly</b> 162:15	184:25 193:1	92:23 96:4 98:21
<b>starts</b> 56:18	168:21 173:24	<b>strike</b> 32:25 44:18	194:8 195:4	110:1 139:6,12
<b>state</b> 12:21 16:1,2,5	174:10	44:21 45:2,8,13	199:25 201:6	166:3 203:4
16:6,6 55:25	<b>stayed</b> 46:3 104:11	45:17 59:12 61:25	206:20 209:8	<b>suddenly</b> 132:13
59:19 60:8 66:2	<b>staying</b> 78:4 160:25	68:12,14 70:25	<b>subjects</b> 12:21 20:2	<b>suddenness</b> 142:21
78:17,20 100:16	167:11 173:8	71:6 72:12 73:3	20:4 22:9,9,13,23	<b>Sue</b> 57:22
101:6 186:17	<b>sternum</b> 90:1,2	75:24 76:11 77:12	25:5,8 26:19,24	<b>suggest</b> 15:21 26:14
192:17,17 195:3	<b>Sticking</b> 193:9	84:1,1 147:14	28:15,20 29:20	26:18 28:19 31:13
206:6	<b>stimulus</b> 186:5	148:7 150:25	31:4 32:7 34:20	31:16 35:20 37:1
<b>stated</b> 3:22 215:2	<b>stock</b> 85:8	152:3 153:5,9	36:5 37:2,3,9,15	45:12 135:17
<b>statement</b> 3:9,23,23	<b>stole</b> 29:18	157:21,23,25	37:18 38:12 42:19	140:13 143:8
6:20 8:5,20 9:8,9	<b>stolen</b> 104:6,13	158:2 170:10	52:22 53:1,8,10	148:1,4 160:20
11:24 12:2,11,17	108:9 113:8	187:17 200:18	53:12,18 54:1,20	169:18 181:24
13:23 14:12 15:4	145:11 181:7	217:13,19 218:2	55:19 58:2,5 59:3	183:2 194:11
16:8,17,18,20	<b>stomach</b> 213:22	<b>strikes</b> 147:11	59:22 60:4 62:7,8	<b>suggested</b> 28:15
17:12 27:2,5,9,10	<b>stone</b> 148:2	152:24 153:14	63:3,8 64:13,18	58:2,5 99:14
28:10,14 29:5,11	<b>stood</b> 23:18 44:16	217:11,15	64:20 65:5,11,14	143:7 174:19
29:17 30:2,19	<b>stoop</b> 111:21	<b>stroke</b> 87:8	65:21 66:1,7,10	175:14 191:6
32:13 33:7 37:21	<b>stooped</b> 110:17	<b>strobing</b> 87:9,10	71:5 73:11 75:16	201:15
49:14 55:13 65:24	206:11	<b>strong</b> 26:23 29:13	82:1 88:19 105:11	<b>suggesting</b> 34:23
91:22 92:10,11	<b>stop</b> 34:20 75:11	29:16 55:22 216:2	105:16 106:5	43:7 126:12
94:9 95:25 103:6	83:22 84:4 97:22	216:6	143:3 146:1 147:2	<b>suggestion</b> 129:10
105:5 116:6	142:16 152:9	<b>struck</b> 134:14	147:4 148:9,11	135:4 137:11
117:18 122:16	153:19 156:23	<b>structure</b> 21:15	164:15 165:2	179:16 195:12
123:2,3 134:4	169:11,14 170:5,8	<b>struggling</b> 152:17	170:6,11,20,23	<b>suggestions</b> 76:21
189:17 195:14,15	170:15,18,20,21	<b>Stuart</b> 1:14	171:5 172:18	<b>suggests</b> 63:7 95:15
195:21,22 196:25	171:12 183:7	<b>student</b> 183:18	176:10 178:24	<b>suitability</b> 185:18

<b>suitable</b> 76:6,8 77:14 152:13	59:20 60:15 61:12 64:18 65:13,16,20	123:16,23 150:25 161:8 169:11,13	<b>tasked</b> 181:11 183:11	191:8 192:8 197:8 198:1 199:11
<b>summarising</b> 196:5	68:3 76:3 114:2	170:18 172:7,7	<b>team</b> 5:3 6:9 21:14	200:12 204:8
<b>summary</b> 196:13	124:19,25 126:7,8	173:2 185:25	33:9,24 34:11	206:7 207:9
<b>Sunday</b> 3:18	150:4 151:13	197:10 218:22,22	49:23 50:14 51:14	220:16
<b>superintendent</b> 8:13,14	152:8 154:23	218:23 219:4,5	52:9 58:9 61:9,11	<b>territory</b> 170:16
<b>superseded</b> 154:19	155:5 173:5	<b>tactically</b> 169:23	61:17,19 68:5,8	<b>terrorism</b> 155:3
<b>Superstore</b> 194:4	174:23 194:22	<b>tactics</b> 68:1,25 69:5	93:13 99:11	<b>terrorist</b> 155:5
<b>supervisor</b> 185:21	200:8,12	69:10 148:12	100:19,20 119:19	219:9,17,23
<b>supervisors</b> 185:17 185:19	<b>suspect</b> 16:22 45:7	157:8	140:5 152:18	<b>test</b> 116:7 184:14
<b>supplementary</b> 133:8	<b>suspects</b> 17:5 141:13	<b>take</b> 1:8,12 3:16	159:13 174:23,23	184:15 185:13
<b>support</b> 5:23 7:4,6 118:19 209:19,23	<b>switch</b> 81:6,13 84:18 87:7 207:5	14:19 21:23 22:7	184:5 199:1	<b>tested</b> 156:20 184:8
<b>supported</b> 85:7 167:15,16	<b>switched</b> 208:8	46:15 53:17,21	207:12 208:2,16	186:5,9,13,24
<b>supports</b> 145:21	<b>system</b> 66:25 86:1	56:23 68:9 69:6	208:16 212:23,25	<b>testing</b> 134:12
<b>suppose</b> 34:8 75:22 78:6	86:15,21 87:4	75:10 100:2,10	213:2,9,11 214:2	<b>tests</b> 134:16
<b>supposed</b> 65:3 152:6 189:15	216:20	113:11 116:10	216:1,24	<b>text</b> 196:5
<b>supposition</b> 214:21	<b>systems</b> 21:3 85:23	118:17,22 120:22	<b>teams</b> 219:25	<b>TFC</b> 33:24 35:18
<b>sure</b> 3:1 5:5 8:25	85:24 86:5	133:5 149:4	<b>technical</b> 86:11	44:22 48:3
10:15 13:3 30:18	<hr/> <b>T</b> <hr/>	151:16 155:2	<b>telescopic</b> 86:17	<b>TFU</b> 18:19 114:2
34:13 52:11,13	<b>T-bone</b> 68:4,8 70:1	157:16,17 158:24	<b>television</b> 198:21	155:8 176:2
53:8 69:13,17	199:25	159:24 168:6	<b>tell</b> 4:17,24 7:6	<b>thank</b> 1:5,19,21 3:3
70:10 80:22,23	<b>T1</b> 86:16	169:6	10:19 50:7 59:6	21:25 57:19,24
101:9 104:8	<b>tab</b> 2:1 3:8,8 11:25	<b>taken</b> 22:20,21	68:7 69:25 80:21	85:25 115:19,24
113:21 138:24	13:7 21:25 25:14	24:18,24 28:5	92:18,21,24 94:25	115:25 116:15
139:7 147:23	26:12 27:2 32:12	50:24 59:25 84:19	120:10 121:3,23	133:7 144:8
154:18 156:18	32:23 38:14 45:4	100:9 115:5	122:16 131:12	178:17 179:4
185:14 200:21	46:18 47:24,25	117:14 120:17,21	138:21 150:21	183:23,24 210:24
204:9	55:1 58:23 71:22	208:21 209:9	164:14,17,24	211:4 220:15
<b>surely</b> 107:4	91:5 95:25 102:9	<b>takes</b> 210:5	176:10 177:5	221:3,3,6
<b>surprise</b> 147:14 148:9	103:5 179:8	<b>talked</b> 182:11	211:16 221:1	<b>thereabouts</b> 192:16
<b>surrender</b> 189:3	191:18 193:18,18	<b>talking</b> 53:5 82:10	<b>telling</b> 40:20 47:7	200:9
<b>surrendering</b> 197:11	195:23	120:19,23 131:3,3	50:13 93:24 195:5	<b>thin</b> 213:25
<b>surround</b> 112:15	<b>TAC</b> 69:19,23	137:12 150:23,23	<b>temperament</b>	<b>thing</b> 9:7,11 14:19
<b>surrounding</b> 143:25 169:25	80:22 84:5 85:15	155:15 160:9	143:18 185:3,7,13	17:19,23 28:3
<b>surveillance</b> 59:19	86:1 87:24 90:15	<b>tap</b> 118:24	<b>tend</b> 15:21 57:13	47:2 56:7 89:5
	<b>tactic</b> 147:21 151:2	<b>tape</b> 109:16,23 220:24	<b>term</b> 145:20	121:8 142:6
	151:9 170:5,19	<b>taped</b> 36:14	<b>terminology</b> 147:13	153:11 184:8
	187:4,15 219:6,16	<b>target</b> 32:9 55:21	153:6	189:21 198:5
	219:22,25 220:11	87:14 186:17	<b>terms</b> 3:13 21:10	202:15 210:6,6,22
	<b>tactical</b> 34:6 59:18	192:11,18 194:13	21:15 86:17 88:2	214:18 215:9,20
	62:22,23 85:20	194:19 203:15	154:5 155:11,22	216:9 218:9
	114:10 115:1	204:14	155:25 160:19	<b>things</b> 6:2 9:14
		<b>targeting</b> 32:20	172:24 173:8,15	10:12 23:7,7 37:8
		<b>targets</b> 186:21	173:23 178:7	38:22 96:9 108:24
			181:10 190:14	149:18 150:22



154:15 164:8 175:8 179:13 186:4 214:13 216:15 <b>think</b> 1:12 2:3 3:8 4:4,20 6:1,8,15 7:3,22 8:6 10:7,10 11:16,20 12:1,6,9 12:13 13:2 14:1 14:10,19,22 15:2 15:6,20 18:1 21:22 23:20 24:4 27:5,20 30:1 31:21 33:17 34:3 34:22 41:23 42:5 43:22 48:11 51:5 52:21 56:6,10 57:20,25 59:25 60:1,25 61:4 63:23 65:22 66:24 71:1 72:24 74:1,8 74:21 76:18 77:18 77:20 79:14 80:2 80:18,20 83:11,14 85:23 86:16 87:18 87:20,24 90:9 94:8 107:25 108:15 109:4 110:22 113:6 114:9 129:9 133:12,13 138:18 143:18 144:24 154:21 164:21 168:5,22 169:7 173:4 175:8 178:7 181:17 186:14 187:8 188:22 189:25 195:23 201:25 210:5 214:10 216:20 219:9,11 220:16 220:23 <b>thinking</b> 54:3,7 74:18,19,19 <b>third</b> 3:5 15:2	31:24 32:2 45:6 52:5 55:9 58:20 63:2 65:24 87:1,4 87:13 97:21 104:4 111:25 151:17 194:7 199:9 205:15 215:20 216:9 <b>Thirdly</b> 162:7 <b>Thomas</b> 116:20,21 116:22,23,23 122:8,11,15 123:6 128:2 137:6,14 143:23 144:7,8 222:7 <b>Thompson</b> 83:12 <b>thought</b> 6:18,22 14:3,4,14 16:9 23:8 24:24 26:1 42:18 52:20 63:7 74:15 80:6 96:7 99:1 100:15,22 101:18 110:12 119:14 126:19 138:15 140:24 163:6 165:14 174:22 177:12 181:2 207:11 211:25 212:3,13 <b>thoughts</b> 207:9 <b>threat</b> 38:9 40:12 40:13 58:15,17 72:10 78:13 88:24 93:12 94:6,11 96:21 102:7 107:4 107:13 109:25 112:13 138:7,12 138:14,22 139:3,3 139:5,7 140:2,20 140:21 144:3,18 169:12 170:19 172:8 176:16 177:10 181:5,12 186:6 190:14,16 190:17 205:19,25	206:7 207:21,22 207:23 208:14,18 208:19 <b>threatening</b> 93:23 216:7 <b>threats</b> 216:8 <b>three</b> 1:13 5:14 11:23 12:18 13:8 22:9 31:4 32:15 42:7 51:21 53:19 54:1,9 63:8 66:9 75:16 85:17,23 86:4 97:19 98:1 126:13,15 127:7 133:14 151:21 179:23 190:4 214:13,15 <b>three-vehicle</b> 151:9 <b>thumb</b> 85:22 <b>Thursday</b> 1:1 4:4,9 <b>tied</b> 26:22 29:12,15 <b>time</b> 2:7 3:17 5:8,9 7:23 8:1 9:13 10:12 13:25 14:22 16:13,20,20 18:13 20:8,25 22:7 32:9 35:1,8 40:21 56:13 59:17,25 60:3,4 64:4,6,21 70:24 77:14 78:17 81:17 94:9,11 96:18 97:3,23 99:23 100:2,9 102:23 103:1 105:3 106:17,23 107:8 108:18,23 114:4 115:14 117:7 121:12,14 125:23 130:7,13 130:15,18,24 144:16,25 147:5 148:18 153:22 156:16 158:25 175:8 176:14 185:24 187:22	188:4,8,11,20,22 189:2,7 207:7 208:8,14 <b>times</b> 14:20,21 16:2 16:4,6,8,10,21 17:4 129:1 143:21 179:6 183:19 186:9,12 <b>timing</b> 71:4 75:22 <b>timings</b> 14:17 71:1 <b>tinted</b> 82:5,18 <b>today</b> 45:1 60:20 122:18 <b>told</b> 8:4,19 23:6 24:25 27:21 30:20 30:24 33:12 36:2 36:5 38:23 39:18 39:23 40:3 42:6 43:1,2,5 46:14 47:9 50:19 51:17 54:23 55:12 59:1 59:25 63:25 64:4 64:6,9,12 66:9 70:24 90:9 111:1 117:10 122:22,24 138:6,15 139:12 150:6 153:5 163:5 163:10 179:1 182:22 194:18 216:21 <b>tolerate</b> 211:13 <b>tool</b> 19:16 <b>top</b> 36:11 86:7 110:4 120:6 165:24 167:5 179:10 196:7 207:14 <b>topic</b> 136:15 <b>torch</b> 88:2 145:18 163:17,24 <b>Totton</b> 23:3 38:14 38:22 39:19 40:3 42:6 43:19 47:10 88:15 90:17,23 98:20 100:18	106:12,14,23 107:5,6,8,22 108:1,7 109:6,10 109:21,24 110:5 110:11,14,19 111:14,17,23 124:12 126:17 128:8 138:2,3,23 139:4,12,19,20 147:7 165:17 177:24,25 182:4 205:2,10 207:4,7 207:10,15,21 208:8,9,11,17,23 208:25 213:20 <b>Totton's</b> 20:7 40:13 139:15 206:2 213:22 <b>tour</b> 12:5,8 <b>town</b> 32:8 <b>trading</b> 192:21 <b>traffic</b> 64:22 152:10 <b>trained</b> 99:21 109:24 141:5 151:14 152:20,22 153:1,16 156:18 160:1,12,15,16 161:11 163:25 171:14 172:2 176:22 177:18 182:17 184:5,20 186:8,9 <b>training</b> 106:2,3 141:16 149:3,14 149:17,20,22,23 150:11,16 152:5 152:19 153:4,24 155:11 159:21,25 160:5,21 161:4 169:1,1,9 170:9 171:9 172:21 182:8,21,22 183:5 183:14,19 184:2,9 184:13 185:22
--	--	--	--	---

186:4,5,10,14 196:1 216:19 217:9 220:12 <b>trajectory</b> 134:12 <b>transcribed</b> 108:4 <b>transcript</b> 71:24 <b>transcripts</b> 47:8,15 <b>transfer</b> 111:14 <b>transmission</b> 125:15 <b>trauma</b> 113:9,11 <b>traumatic</b> 30:13 <b>travelled</b> 126:4 <b>treat</b> 31:3,7,15 38:19 39:13 42:13 89:1 <b>treated</b> 39:5 <b>trigger</b> 96:10 99:25 100:3,4,11 <b>true</b> 3:1 17:13 102:5 <b>truly</b> 177:12 <b>truth</b> 122:14 <b>try</b> 41:7 156:20 <b>trying</b> 109:1 120:12 148:6 155:17 166:12 168:21 181:24 <b>tucked</b> 79:8 <b>Tuesday</b> 3:19 <b>turn</b> 1:24 2:1 10:17 18:18 21:21,25 26:11 36:10 38:11 58:22 61:7 79:11 86:4 94:14 129:23 157:15 182:9 191:20 192:2 193:9,18 216:19 <b>turned</b> 44:22 134:25 <b>turning</b> 132:24 133:1,2,3,4 135:5 162:23 <b>TV</b> 56:6 <b>twisted</b> 203:2	<b>two</b> 1:13 2:3,11,15 5:12 9:14 38:1 48:9 51:21 57:23 65:13 84:23 86:11 88:12 89:19 96:17 97:8,13 103:6 109:18 114:1 126:13 127:5 130:7,15,17,23 134:5,11 138:14 151:1 158:3 168:23 169:7 180:18 189:25 199:15 211:5 217:1,23 <b>two-thirds</b> 94:18 196:4 <b>type</b> 22:18 204:1 <b>typically</b> 186:13,14 <hr/> <b>U</b> <b>U2</b> 113:13 <b>ultimately</b> 50:18 <b>unable</b> 70:20 171:3 <b>unarmed</b> 142:11 <b>unaware</b> 123:19 <b>unclear</b> 32:8 <b>uncomfort</b> 92:20 <b>unconventional</b> 153:13,15 157:21 217:13,15,19 <b>undergone</b> 220:11 <b>understand</b> 3:4 22:8 23:23,24 44:1 57:16 72:15 73:6,8,13 126:6 131:4 150:6 155:8 172:13 211:14 <b>understanding</b> 18:21,25 19:21 73:10 80:9,14 150:14 <b>understood</b> 23:6 132:20 149:23 <b>undertaking</b> 14:15	<b>undoubtedly</b> 30:13 <b>unfamiliar</b> 161:6 <b>unfolds</b> 153:3 <b>Unfortunately</b> 31:23 142:12 <b>unidentified</b> 126:17 <b>uniquely</b> 23:20 24:8 <b>unit</b> 8:12,13 19:4 19:15,25 20:4 60:15 61:12 114:11 115:2 185:12,25 197:10 <b>unknown</b> 58:20 199:9,15 <b>unloaded</b> 115:2 <b>unmoved</b> 218:13 <b>unnaturally</b> 14:5 <b>unsuccessfully</b> 209:16 <b>update</b> 58:2,5,19 <b>updates</b> 56:1 <b>uplift</b> 155:1,4 <b>upper</b> 79:11 89:23 <b>upskill</b> 160:18 <b>upward</b> 89:24 100:19 212:17 <b>upwards</b> 90:1 177:16 <b>use</b> 7:24 27:11 36:7 43:11 45:11,22 48:18 84:23 134:22 145:20 147:13 153:2 175:20 202:24 203:23 204:1 205:8 214:22 215:18 <b>utilised</b> 160:6 <hr/> <b>V</b> <b>V53</b> 4:14 5:15 6:11 7:2 118:8 119:25 120:4,8,16 121:4	121:7 <b>variable</b> 218:20 <b>variants</b> 187:21 <b>variations</b> 148:14 <b>variety</b> 183:14 <b>various</b> 50:21,23 <b>vehicle</b> 15:9 34:24 36:15,19 45:7,12 55:10 58:10,20 60:11,16 61:13,24 61:25 62:24 64:4 64:6,9,13 65:15 65:21,23 66:2,16 67:8,13,19,25 68:19,22 69:1,6 69:10,11 70:13,16 71:6,9 74:2,7,14 74:15,16 75:24 77:6,15 78:4,11 78:14 79:19,21 80:6,10,12,15,19 81:3,15,22,24 82:2,5,9,11 83:22 84:4 85:10,14 88:10,15,25 89:5 90:9,13 96:3 97:17,22 100:24 100:25 101:17 102:13,18,24 103:18 104:11,12 104:25 105:25 106:19,20,24 107:1,9,18,23 108:2,8 109:6,11 109:12,22 110:16 110:17 112:1,7,16 112:19,23,25 113:7,18,24,24 114:2 124:1,4 125:7,8,17 127:1 127:3,8,11,12 128:7,11 130:15 133:18,21 134:8 139:24,25 140:15 142:15,21,24,25	147:11,14 148:7 148:11 150:5,25 151:10,10,15,18 152:8,23 153:5 154:13 157:4,15 157:16,17 158:15 159:6,12,13 160:7 161:8 165:4 169:14,24 170:1,4 170:10,11,18,25 171:3,4,7,15,18 171:21,24 172:9 172:10,16 173:5,7 173:8 174:7 177:9 177:17 183:8 187:17 194:9 195:4,6 199:15 200:13,20,21,23 201:6,10 202:1 203:9,12,17 204:8 205:2,22 207:8,10 212:14 217:7,8,18 218:20 <b>vehicles</b> 16:21 17:4 59:2 66:13 123:23 134:5,11 148:17 150:3 151:3,13,21 152:11 153:20,23 154:25 155:7 169:23 170:22 183:7 217:23 218:24,25 219:3,3 219:17 <b>verbal</b> 170:6,24 <b>verbally</b> 146:8 169:25 <b>verbatim</b> 30:8,14 30:16,25 <b>verify</b> 14:21 16:9 <b>versed</b> 204:5 <b>version</b> 131:12 132:24 143:10 <b>vertical</b> 84:16 <b>viable</b> 192:18 <b>vicinity</b> 146:21
---	--	---	---	---

170:3 171:6 177:3 177:7 <b>video</b> 9:21 <b>video-link</b> 1:7 <b>view</b> 91:23 92:11 95:22 96:5 100:23 102:1 107:14 116:10 124:10 136:5,24 157:18 162:13,19 167:4 181:4,9 <b>village</b> 66:14 <b>violation</b> 203:4 <b>violent</b> 44:3,4 <b>visible</b> 86:21,24 87:1,13 146:24,24 146:25,25 <b>vision</b> 139:17 <b>visit</b> 4:8 118:14,15 <b>voice</b> 128:23 129:3 <b>volition</b> 170:2 <b>volume</b> 52:4 55:1 71:22 <b>vulnerability</b> 165:2 167:9 <b>vulnerable</b> 163:8 176:7,12	123:10 124:2,9 130:13 131:1 133:23 149:5 168:1,15 175:17 191:16 211:18 214:13 220:20 <b>wanted</b> 5:3 7:5 92:2 125:9 127:19 138:12 <b>wants</b> 108:15 <b>warning</b> 57:15 <b>warnings</b> 38:19 42:7,14 43:22 114:7 <b>Warrington</b> 15:11 15:16 <b>wasn't</b> 3:25 5:8 16:9 17:13 25:10 31:1 34:9 37:24 53:12,17 58:17 59:18 60:20 66:5 76:14 77:1,7,14 79:19 85:10 92:19 93:2 101:1 117:22 117:25 118:1 119:4 126:5,19 131:21 155:9 162:2 172:18 173:16 174:2 175:2 194:18 195:11 206:21 219:6 220:10,11 <b>watching</b> 109:12 205:18 <b>way</b> 4:1 10:23 13:15 16:14 23:6 30:5 38:8 42:7,17 46:21 56:19 59:1 71:19 72:20 74:5 76:22 84:20 85:10 92:5 94:18 99:18 104:8 107:25 112:23 127:23 162:3,17 168:25 171:24 172:22	175:11 182:19 184:4 187:16 199:18 216:5 <b>ways</b> 105:13 210:3 <b>weapon</b> 22:18 24:1 24:16 84:12,23 86:7 89:7 94:21 97:23 98:4 99:19 99:21 100:2,9,10 100:11,12,15,18 100:23 101:3 105:3,15 106:3 109:24 110:7 129:5 133:12,14 138:10 142:22 178:25 186:7 203:11,24 204:2 205:8 206:8,10 207:17 211:23 212:1 214:5 <b>weapons</b> 35:8 43:10 44:13 115:2 138:16 180:9 181:14 189:3 190:21,24 197:11 205:24 <b>wear</b> 79:12,15 80:1 80:2 202:12,19 <b>wearing</b> 59:10 90:6 182:4,5 202:10,15 202:17 <b>weather</b> 83:18 <b>Weatherby</b> 144:9 144:10,11,12,13 168:2,4,7,11,18 178:5 182:20,24 222:8 <b>week</b> 117:1 <b>weeks</b> 3:21 186:15 190:3,4 <b>welfare</b> 4:8 5:3,6 5:17 7:3,4 118:14 118:15,19 119:1,7 119:18,21,22 120:9,10,24 122:5	209:19 211:10 <b>went</b> 5:2 19:1 40:13 41:25 45:25 54:13 63:12 93:8,17 95:5 113:5,20 115:1 119:25 120:13 121:25 130:19 136:17,17 138:7 142:4 143:16 156:24 161:18,22 166:5 166:21 167:1,3,14 173:16,16 192:17 207:2 <b>weren't</b> 51:17 70:17 71:25 82:17 83:12 90:10,10,13 125:7,15 131:10 160:16 162:9 176:25 177:18 194:25 213:10 <b>whichever</b> 19:15 202:23 <b>whilst</b> 63:20 106:12 106:12 201:8 212:6 220:18 <b>Whyte</b> 178:7,10,11 178:12 183:22 184:4 214:4 222:9 <b>wide</b> 44:6 <b>widely</b> 60:25 <b>wildly</b> 31:21 <b>Williams</b> 4:12 6:11 <b>wind</b> 163:2 <b>window</b> 79:11 81:3 81:6,18 82:15 84:5,18,19,20 89:6 100:25 108:9 112:3,4 133:18 134:20 137:20,21 137:24,24 145:15 145:16 162:14,18 162:18,23 174:21 177:21 201:4 212:17,18	<b>windows</b> 60:12 61:2,21,22 62:3 62:11,21 82:5,17 158:17 171:4 174:15 175:15 203:19 <b>windscreen</b> 82:8,9 82:11 88:10 132:8 132:12 135:15 162:15,25 200:3 201:17 204:11 <b>wish</b> 37:8 <b>witness</b> 1:3 3:9 6:20 11:24 12:2 12:10,17 13:23 14:12 15:3 16:16 27:2,5,9,10 28:14 29:5 30:18 32:13 33:7 49:14 95:24 103:5 109:1 122:16 189:17 196:24 <b>witnesses</b> 116:7 <b>wonder</b> 168:11 <b>word</b> 36:7 92:1,5 123:5 147:24 152:15 157:10,11 207:1 <b>words</b> 17:10 18:5 28:9 78:2 84:1 109:2 118:1 123:3 132:25 135:24 190:23 191:13 204:18 <b>wore</b> 163:10 <b>work</b> 46:13 56:10 56:13 113:5 134:3 153:5,7 155:17 156:7,17,22,25 158:11 167:18 182:23 183:14 184:5,19,19 219:23,24 <b>worked</b> 161:7 219:11
<b>W</b>				
<b>W4</b> 59:8 68:2 104:11 174:1,6,9 <b>W9</b> 59:8 70:5,12,22 101:12,19 103:22 104:9 128:13,13 137:5,6,6,9 145:1 146:24 <b>wait</b> 26:20 28:25 29:3 56:25 76:9 99:9 177:13 <b>waiting</b> 53:7 <b>walk</b> 65:18 <b>Walker</b> 18:12 <b>wall</b> 75:10 217:22 <b>want</b> 18:21 22:7 72:2 107:5 118:1				

<p><b>working</b> 33:4 36:22 42:19 45:1 63:11 155:6 <b>worst</b> 25:12 <b>wouldn't</b> 5:16 20:25 23:5 34:8 38:23 39:14,15 44:23 71:12 74:15 74:16 78:2 80:7,8 100:12 105:14,23 125:7,13,20 129:14 133:17 154:17 158:14 162:4,6,24 164:3 164:25 166:20 178:2 206:9 213:13,15 <b>write</b> 11:8 17:13 <b>writing</b> 2:11,20 10:9,24 11:9,11 16:8 <b>written</b> 2:7,15,16 3:14,22 10:17 14:4,14 15:22 28:12 42:17 92:7 92:14 107:25 188:5 <b>wrong</b> 54:16 128:18 149:25 150:1,15 157:10 157:11 174:18 <b>wrongly</b> 108:3 <b>wrote</b> 2:17,17,18 10:21 17:9 18:5</p> <hr/> <p style="text-align: center;"><b>X</b></p> <hr/> <p><b>X</b> 222:3 <b>X7</b> 52:21,24 53:9 53:17 54:15 55:5 59:8 62:18 68:2,4 68:22 69:5,19,23 70:2,5,12,22 72:2 72:6,15 73:6,18 73:22 74:19,22 76:21,24 77:7</p>	<p>83:24 103:16,19 104:10 113:20 123:20 127:11,14 127:19,23 128:3 128:25 129:5,11 129:17 131:1 135:4,20,24,25 136:3,4,12 137:4 145:1 146:24 162:13,19,20,21 167:14 174:11 199:22 <b>X7's</b> 128:23 <b>X9</b> 101:12,19 128:5 128:6,11 137:4,9 137:10,11,11,13 137:14,15,23</p> <hr/> <p style="text-align: center;"><b>Y</b></p> <hr/> <p><b>yeah</b> 53:14 95:4 <b>year</b> 186:12,15 <b>years</b> 185:23 186:1 186:2 209:9,14,17 211:9</p> <hr/> <p style="text-align: center;"><b>Z</b></p> <hr/> <p style="text-align: center;"><b>0</b></p> <hr/> <p><b>06.15</b> 12:10</p> <hr/> <p style="text-align: center;"><b>1</b></p> <hr/> <p><b>1</b> 3:8 11:25 12:1 15:15 27:2 32:12 38:2 44:1,1,7 46:18 47:9,13,14 47:18 48:18,22 58:23 95:25 103:5 134:19 151:13 179:8 195:23 222:5,6 <b>1.00</b> 188:8 <b>1.04</b> 116:17 <b>1.15</b> 16:18 <b>1.24</b> 204:3,6 <b>1.28</b> 204:5 <b>1.88</b> 176:20</p>	<p><b>10</b> 13:4,15 14:7 40:8 107:19 130:21,24 131:3 187:12,13 193:19 209:17 <b>10-minute</b> 56:23 <b>10.00</b> 221:8 <b>10.05</b> 1:2 <b>10.10</b> 1:16 <b>10.12</b> 1:18 <b>109</b> 97:20 <b>11</b> 46:3 <b>11.26</b> 57:3 <b>11.35</b> 57:2 <b>11.42</b> 57:5 <b>1148</b> 48:15 <b>116</b> 222:7 <b>1181</b> 71:22 <b>12</b> 154:22 <b>12.81</b> 191:20 <b>12.82</b> 192:2 <b>121</b> 179:9,10 <b>123</b> 98:13 <b>1266</b> 22:3 <b>1267</b> 22:5 26:13 32:2 <b>1268</b> 38:14 <b>1270</b> 42:13 <b>1283</b> 192:24 <b>13</b> 64:19 179:7 <b>137</b> 206:24 <b>139</b> 110:3 206:19 207:14 <b>140</b> 207:20 <b>142</b> 208:3 <b>144</b> 208:5 222:8 <b>15</b> 13:4,15 14:7 51:15,17 114:1 120:5,6 179:13 <b>150</b> 219:13 <b>152</b> 219:21 <b>16</b> 7:22 34:11 47:25 193:19 <b>178</b> 222:9 <b>18.15</b> 13:1</p>	<p><b>18.29</b> 125:22 126:1 <b>184</b> 222:10 <b>1999</b> 40:4,14,15,19</p> <hr/> <p style="text-align: center;"><b>2</b></p> <hr/> <p><b>2</b> 2:1 12:4 13:7 21:24 25:14 26:12 32:23 38:4 45:4 55:1 71:22,25 91:5 102:9 134:24 <b>2.05</b> 115:20 116:16 <b>2.08</b> 116:19 <b>2.30</b> 2:7 <b>20</b> 120:5,6 <b>20/25</b> 168:3 <b>2000</b> 53:9 54:2 <b>2005</b> 185:25 209:12 <b>2008</b> 23:1 26:19 28:16,20 30:24 36:2 43:17 198:6 <b>2010</b> 149:16,21,24 154:21 158:8 159:23 182:14 216:21 <b>2011</b> 152:18 169:2 <b>2012</b> 3:9 120:16 149:24 150:11 152:5 187:14 190:1 196:8 219:2 <b>2013</b> 209:13 <b>2014</b> 120:22 <b>2015</b> 209:17 <b>2017</b> 1:1 <b>21</b> 71:22 <b>211</b> 222:11 <b>22</b> 21:25 26:12 38:14 191:18 <b>23</b> 55:1 193:18 <b>24</b> 204:7 <b>259</b> 168:24 <b>26</b> 23:14 116:6 <b>260</b> 170:14 <b>267</b> 27:3,14 32:13 <b>268</b> 46:18 58:24 196:14</p>	<p><b>269</b> 63:19 65:25 <b>270</b> 95:25 103:6 205:6 <b>271</b> 197:8 <b>28</b> 71:1 200:9 <b>29</b> 197:20,23</p> <hr/> <p style="text-align: center;"><b>3</b></p> <hr/> <p><b>3</b> 1:25 3:17 6:20 12:17 15:3 18:18 27:6 41:23 55:25 60:20 61:5 161:15 171:20 187:14 188:11 190:9 196:8 <b>3.00</b> 188:8 189:5 <b>3.26</b> 168:8 <b>3.38</b> 168:10 <b>31</b> 19:7 <b>341</b> 55:3 193:19 <b>36</b> 179:13 <b>38</b> 149:8 150:24 151:16 <b>39</b> 150:24 <b>3rd</b> 26:4</p> <hr/> <p style="text-align: center;"><b>4</b></p> <hr/> <p><b>4</b> 27:10,24 119:13 159:4 <b>4.00</b> 20:24 56:15 188:12,15 <b>4.30</b> 12:4,5 56:10 56:14 196:8 <b>4.40.23</b> 35:5 <b>4.45</b> 2:8 <b>4.50</b> 221:7 <b>41</b> 158:1 <b>45</b> 84:16 <b>45-degree</b> 84:15 <b>48</b> 159:2 <b>49</b> 68:10 159:3 <b>4th</b> 2:8</p> <hr/> <p style="text-align: center;"><b>5</b></p> <hr/> <p><b>5.30</b> 58:8 <b>50</b> 8:1 68:9</p>
--	--	---	--	---

<b>51</b> 159:19 <b>58</b> 206:17 <b>59</b> 220:17 <hr/> <b>6</b> <hr/> <b>6</b> 1:1 <b>6.00</b> 13:9,10 14:6 20:25 26:3 27:25 59:1,18 <b>6.15</b> 12:12,20 13:24 14:12 59:21 63:3 125:25 <b>6.29</b> 60:5 <b>6.45</b> 64:2 <hr/> <b>7</b> <hr/> <b>7.00</b> 56:19 192:16 193:4 <b>73</b> 182:9 <b>74</b> 133:6,25 <b>77/12</b> 196:10 <b>78</b> 198:17,19 <b>79</b> 198:17 <hr/> <b>8</b> <hr/> <b>8</b> 117:21 121:14 209:7 <b>800</b> 219:15 <b>8th</b> 4:9,11 5:12 <hr/> <b>9</b> <hr/> <b>9</b> 3:9 7:19 16:18 96:19 175:6 189:17 195:22 204:3 205:5 <b>9th</b> 9:25				
--	--	--	--	--