

<p>1 Friday, 10 February 2017</p> <p>2 (10.30 am)</p> <p>3 THE CHAIRMAN: Yes Mr Beer.</p> <p>4 MR BEER: Thank you, sir.</p> <p>5 Tim Forber, please.</p> <p>6 MR TIM FORBER (sworn)</p> <p>7 THE CHAIRMAN: Thank you Mr Forber, you are most welcome to</p> <p>8 sit down if you would like to do so.</p> <p>9 A. Thank you.</p> <p>10 Questions from MR BEER</p> <p>11 MR BEER: Mr Forber my name is Jason Beer, and I ask</p> <p>12 questions on behalf of the Inquiry with Ms Cartwright.</p> <p>13 In front of you there there should be a folder. It</p> <p>14 hasn't a witness statement in it because I don't think</p> <p>15 you have prepared a witness statement in the course of</p> <p>16 these proceedings, but instead there is a report dated</p> <p>17 6 July 2012; can you see that between pages 1 and 2?</p> <p>18 A. Yes.</p> <p>19 Q. Is that your report?</p> <p>20 A. It is, yes.</p> <p>21 Q. Are the contents of it true to the best of your</p> <p>22 knowledge and belief?</p> <p>23 A. They are, yes.</p> <p>24 Q. Thank you very much.</p> <p>25 When you made that, you were a chief superintendent;</p> <p style="text-align: center;">Page 1</p>	<p>1 Q. I see, so it was a response to a request from the IPCC,</p> <p>2 effectively?</p> <p>3 A. Absolutely.</p> <p>4 Q. I see.</p> <p>5 If we can deal then with the circumstances of the</p> <p>6 burglary as you understand them to be.</p> <p>7 A. Yes.</p> <p>8 Q. It was a sneak in burglary; is that right?</p> <p>9 A. That's right, yes.</p> <p>10 Q. Through a side door that was closed but not locked?</p> <p>11 A. Yes.</p> <p>12 Q. Items were stolen from a kitchen work surface just</p> <p>13 inside the door?</p> <p>14 A. That is my understanding, yes.</p> <p>15 Q. The stolen items were a set of car keys for the</p> <p>16 officer's VW Golf.</p> <p>17 A. Yes.</p> <p>18 Q. A wallet and its contents.</p> <p>19 A. Yes.</p> <p>20 Q. Did the contents include a USB memory stick?</p> <p>21 A. That's right, yes.</p> <p>22 Q. The other items stolen, was that the Volkswagen Golf</p> <p>23 that was parked outside?</p> <p>24 A. Yes.</p> <p>25 Q. Dealing with the memory stick then, please; is it right</p> <p style="text-align: center;">Page 3</p>
<p>1 does that remain the case?</p> <p>2 A. I am still a substantive chief superintendent, but I am</p> <p>3 currently seconded to South Yorkshire Police as</p> <p>4 a temporary assistant chief constable.</p> <p>5 Q. Thank you. When you made the report, you were the</p> <p>6 Oldham division commander; is that right?</p> <p>7 A. That's right, yes.</p> <p>8 Q. Can I turn to the circumstances in which it was made,</p> <p>9 the report?</p> <p>10 A. Yes.</p> <p>11 Q. Is it right that there was a burglary on 17 July 2011?</p> <p>12 A. That's right, yes.</p> <p>13 Q. Was that at the home address of a detective constable</p> <p>14 serving with GMP in the drugs squad?</p> <p>15 A. Yes, it was. Yes.</p> <p>16 Q. Did your division subsequently become responsible for</p> <p>17 the investigation of that offence or an offence of</p> <p>18 handling stolen goods arising from it?</p> <p>19 A. Yes.</p> <p>20 Q. Is this a closing report, effectively, of that</p> <p>21 investigation? Would that be the way to describe it?</p> <p>22 A. I wouldn't describe it in those circumstances. I did</p> <p>23 this report in response to a request from individuals</p> <p>24 pulling together documentation for the inquiry following</p> <p>25 Mr Grainger's death.</p> <p style="text-align: center;">Page 2</p>	<p>1 that inquiries established that the memory stick -- if</p> <p>2 you want to refer to the report then please do so --</p> <p>3 A. Yes.</p> <p>4 Q. -- was a 4 gigabyte USB memory stick?</p> <p>5 A. That's right, yes.</p> <p>6 Q. It was not encrypted --</p> <p>7 A. That is my understanding.</p> <p>8 Q. -- and inquiries revealed it was not even password</p> <p>9 protected.</p> <p>10 A. That's right, yes.</p> <p>11 Q. It was a commercially available memory stick and not</p> <p>12 marked up as GMP property?</p> <p>13 A. That's correct, yes.</p> <p>14 Q. It was something that the officer had purchased.</p> <p>15 A. Yes.</p> <p>16 Q. The memory stick contained -- and I am taking this from</p> <p>17 your report -- very sensitive GMP data; is that right?</p> <p>18 A. That is my understanding, yes.</p> <p>19 Q. Yes. If you look at that bundle there, at page 5, we</p> <p>20 have the report of Ian Foster from the Force OPSY Team,</p> <p>21 the operational security division and, on page 5 of the</p> <p>22 bundle, in the second paragraph, can you see he</p> <p>23 describes it -- and I am just adducing this through you,</p> <p>24 effectively --</p> <p>25 A. That's correct, yes.</p> <p style="text-align: center;">Page 4</p>

<p>1 Q. -- he says: 2 "The information contained within the device, should 3 it be made public, would be highly embarrassing to the 4 GMP and potentially other partner agencies. In 5 addition, the data could pose significant risks to 6 certain named individuals." 7 A. Yes. 8 Q. That was because, in short, was it, that investigation 9 revealed that the officer had used the memory stick to 10 copy documents from his work computer on to it? 11 A. Yes. 12 Q. Thank you. 13 Can I turn then to GMP's response to the burglary 14 and the loss of the memory stick. 15 Is it right that GMP responded in a number of ways 16 to the burglary and the loss of the memory stick? 17 A. Yes. 18 Q. Including -- I think you are probably aware of this -- 19 a risk assessment process concerning the individuals 20 mentioned on the memory stick? 21 A. I was aware -- I mean, I had -- my involvement in this 22 was strictly about the reactive investigation to the 23 burglary. I was aware, however, that others were 24 carrying out such risk assessments. 25 Q. So there was one strand which was a risk assessment</p> <p style="text-align: center;">Page 5</p>	<p>1 A. That's right, yes. 2 Q. Was it established that the airbag kit had been 3 purchased by a man in response to the Ebay advert? 4 A. Yes. 5 Q. And his son had collected the item from Vass North-west 6 car breakers' yard, in Radcliffe, Manchester? 7 A. Yes. 8 Q. That was on 23 July 2011, six days after the burglary? 9 A. Yes. 10 Q. Was it established through that purchaser that the 11 vendor had been paid £500 for the airbag kit? 12 A. That's correct, yes. 13 Q. A description I think was given of the male from whom 14 the airbag was purchased, as: 15 "A white male, approximately 35 years old, 16 approximately 6 feet tall. Slim build, short brown 17 hair, clean shaven and who spoke with a Manchester 18 accent." 19 A. That's right, yes. 20 Q. Was it established that the vendor had used the Ebay 21 account Ant1234*2011? 22 A. That's right, yes. 23 Q. Was it established that account belonged to 24 Anthony Grainger? 25 A. Yes.</p> <p style="text-align: center;">Page 7</p>
<p>1 process? 2 A. Yes. 3 Q. There was another strand which was the reactive 4 investigation, and it is that strand that you were 5 responsible for. 6 A. Well, it was officers on my division, yes. 7 Q. Your division, thank you. 8 A. Yes. 9 Q. And a third strand was a force information technology 10 response, an IT response? 11 A. Yes. 12 Q. Thank you. 13 Can I turn to the part for which officers on your 14 division were responsible for the investigation. 15 A. Yes. 16 Q. Is it right that the primary aim of the investigation 17 was to recover the memory stick? 18 A. Yes. 19 Q. But, in order to do that, Inquiries were made into what 20 had become of the Volkswagen Golf? 21 A. Clearly, that was a significant live inquiry. 22 Q. Yes, and as part of the investigation, was it 23 established that an advert on Ebay had offered for sale 24 a VW Golf Mk 6 Airbag Kit which was for the exact model 25 of the stolen car?</p> <p style="text-align: center;">Page 6</p>	<p>1 Q. If you look at page 2 of your bundle there, at the top 2 of the page, was it established by inquiries that that 3 Ebay user account had connected to it, the contact 4 address -- I am not going to read it out -- that is 5 given there, the shipping address that is given there, 6 and an email address beginning with "Grainger"? 7 A. That's right, yes. 8 Q. Is it right that the airbag was recovered from the 9 purchaser? 10 A. Yes. 11 Q. Who was considered to be an innocent purchaser? 12 A. Indeed, yes. 13 Q. And examined, and through inquiries with Volkswagen was 14 found to be attributable to the stolen Volkswagen Golf 15 through its vehicle identification number? 16 A. Yes. 17 Q. Is it right that inquiries were made of Vass North-west 18 car breakers' yard and it was found that the proprietor 19 was a man called Colin Waters? 20 A. Yes. 21 Q. That Mr Grainger and Mr Waters resided at the address 22 that was given as the shipping address for the Ant1234 23 email account? 24 A. Yes, that's right. 25 Q. And that intelligence suggested that Vass North-west car</p> <p style="text-align: center;">Page 8</p>

<p>1 breakers' yard was used as a premises to receive stolen 2 vehicles and stolen VW parts that were then sold on to 3 innocent purchasers? 4 A. That's right, yes. 5 Q. Was, therefore, a decision made to arrest both 6 Mr Grainger and Mr Waters? 7 A. Yes. 8 Q. Was that on suspicion of handling the stolen airbag? 9 A. Absolutely, yes. 10 Q. Not the burglary? 11 A. No. 12 Q. And not the theft of the memory stick? 13 A. No. 14 Q. Was Mr Grainger therefore arrested, on 15 29 September 2011? 16 A. That's correct, yes. 17 Q. Were you aware, before his arrest, that a document 18 called a subject profile was prepared in respect of him? 19 A. No, I wasn't. 20 Q. Is that because you weren't intimately involved in the 21 investigation or that you were intimately involved, but 22 this may have gone on under your radar? 23 A. No, as divisional commander this was carried out -- 24 I mean, there is in excess of 500 officers and staff at 25 Oldham. So it may well have been prepared, but it was</p> <p style="text-align: center;">Page 9</p>	<p>1 A. That's correct, yes. 2 Q. To your knowledge, other than the provision, as we have 3 heard, of a subject profile on Mr Grainger to 4 Operation Shire, was there any connection between 5 Operation Shire and the theft of the memory stick? 6 A. None at all. None at all. 7 Q. Thank you very much. If you wait there, there may be 8 some questions. 9 Questions from MR THOMAS 10 MR THOMAS: Sir, just a few questions, if I may. 11 Chief superintendent, can I just ask you this: just 12 following on from the very last question that you were 13 asked, the officers or team of officers who were charged 14 with arresting Mr Grainger in relation to the handling 15 matter -- 16 A. Yes. 17 Q. -- do you know whether any of those officers were 18 involved in the subsequent events that took place known 19 as "Operation Shire"? 20 A. Not to my knowledge. 21 Q. When you say, "Not to your knowledge", is this something 22 that you have investigated? 23 A. No, it is not. 24 Q. Specifically, are you able to say, or are not able to 25 say, whether officers who were involved in the arrest</p> <p style="text-align: center;">Page 11</p>
<p>1 not something that I would expect to see. 2 Q. Right. Mr Grainger was arrested and interviewed; is 3 that right? 4 A. Yes. 5 Q. And he answered, "No comment", to all questions asked of 6 him? 7 A. Yes. 8 Q. Some additional inquiries were carried out, firstly, 9 forensic examination of the airbag; that did not prove 10 that the airbag had been in the possession of 11 Mr Grainger? 12 A. That's correct. 13 Q. His home address was searched and nothing of relevance 14 to this Inquiry was found within it. 15 A. That's correct. 16 Q. Mr Grainger's computers were examined, and they did not 17 indicate that the USB stick had ever been connected to 18 the computers. 19 A. That's right. 20 Q. An ID parade was conducted and Mr Grainger was not 21 picked out. 22 A. That's correct. 23 Q. In those circumstances, was a decision, on 24 6 January 2012, taken to take no further action against 25 Mr Grainger?</p> <p style="text-align: center;">Page 10</p>	<p>1 were part of the operation, on 3 March? 2 A. I can't say definitively. What I would say is that the 3 first I knew of the connection between the two was some 4 time after the events of 3 March. 5 Q. All right. Because, can we just clarify this, just so 6 it is absolutely clear: the missing memory stick, that 7 was not recovered, was it? 8 A. It has not been recovered, no. 9 Q. No. So it was still extant at the time of the 10 operation, on 3 March? 11 A. Yes. 12 Q. Can I ask you this -- and I have nearly finished: you 13 have said there was sensitive information on the memory 14 stick -- 15 A. Yes. 16 Q. -- did that information included information re 17 informants? 18 A. I have no idea. To this day, I have no idea. It has 19 never been in my knowledge of what was on that memory 20 stick, I just know it was operationally sensitive. 21 Q. You said, "To this day ..."? 22 A. To this day, in terms of what was actually on the memory 23 stick, I took no part in the risk assessment process. 24 No one has said to me, at any stage, the memory stick 25 contained information about this particular situation,</p> <p style="text-align: center;">Page 12</p>

<p>1 that particular situation. I have no idea what was</p> <p>2 actually on that memory stick, save for the fact that it</p> <p>3 was operationally sensitive. Others within GMP were</p> <p>4 charged with managing that.</p> <p>5 MR THOMAS: Okay.</p> <p>6 Sir, just bear with me, just one moment.</p> <p>7 Sir, that is all I ask. Thank you very much.</p> <p>8 THE CHAIRMAN: Thank you, Mr Thomas. Mr Weatherby, any</p> <p>9 questions?</p> <p>10 MR WEATHERBY: No, thank you.</p> <p>11 MS WHYTE: No, thank you sir.</p> <p>12 THE CHAIRMAN: Thank you very much Mr Forber for assisting</p> <p>13 the Inquiry, that is the end of your evidence.</p> <p>14 A. Thank you.</p> <p>15 MR BEER: Andrew Talbot, please.</p> <p>16 MR ANDREW TALBOT (sworn)</p> <p>17 THE CHAIRMAN: Mr Talbot, I think you may be there for some</p> <p>18 time. Although we are sitting in a courtroom, as you</p> <p>19 know, this is an Inquiry.</p> <p>20 A. Yes, sir.</p> <p>21 THE CHAIRMAN: We are not sitting as a courtroom. In those</p> <p>22 circumstances, please do feel free to sit down if you</p> <p>23 want to do so.</p> <p>24 A. Yes, sir.</p> <p>25 THE CHAIRMAN: A lot of witnesses have chosen to do so.</p> <p style="text-align: center;">Page 13</p>	<p>1 us, March 2012?</p> <p>2 A. That's correct, sir, yes.</p> <p>3 Q. What rank did you hold at that time?</p> <p>4 A. Detective constable.</p> <p>5 Q. Does that remain the case now?</p> <p>6 A. Yes, sir.</p> <p>7 Q. How long had you served in the police service by that</p> <p>8 time?</p> <p>9 A. I joined in June 2001, so 10 years, at the time.</p> <p>10 Q. You were on the Force Robbery Unit, the FRU at that</p> <p>11 time; is that right?</p> <p>12 A. I had been there since 2008, sir.</p> <p>13 Q. So about three years, at this time?</p> <p>14 A. Just over three years, yes, sir.</p> <p>15 Q. Thank you.</p> <p>16 What are the responsibilities of the officer in the</p> <p>17 case, where, like this case, there is an SIO and</p> <p>18 a Deputy SIO?</p> <p>19 A. As a case officer, it is my job to present the evidence,</p> <p>20 gather the evidence, action, write-up statements.</p> <p>21 Obviously, you might have officers to conduct a</p> <p>22 disclosure in exhibits, and a telephones officer, but it</p> <p>23 is my job to present a file to the CPS.</p> <p>24 Q. So, before the file goes to the CPS, if you just slow</p> <p>25 down and list the responsibilities.</p> <p style="text-align: center;">Page 15</p>
<p>1 A. Okay.</p> <p>2 Questions from MR BEER</p> <p>3 MR BEER: Mr Talbot, first of all, I am Jason Beer and I ask</p> <p>4 questions with Ms Cartwright on behalf of the Inquiry.</p> <p>5 A. Yes, sir.</p> <p>6 Q. Can you open up the bundle, that you have in front of</p> <p>7 you, at page 1. Can you see, between page 1 and 2,</p> <p>8 there is a witness statement, dated 2 April 2012?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Is that your witness statement?</p> <p>11 A. Yes, sir.</p> <p>12 Q. At page 3, there is a witness statement, dated</p> <p>13 10 September 2012; is that your witness statement?</p> <p>14 A. Yes, sir.</p> <p>15 Q. At page 4 to 5, there a witness statement, dated</p> <p>16 7 August 2014; is that your witness statement?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Are the contents of those three witness statements true</p> <p>19 to the best of your knowledge and belief?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Thank you.</p> <p>22 I think you were the officer in the case, or the</p> <p>23 case officer, for Operation Shire; is that right?</p> <p>24 A. Yes, sir.</p> <p>25 Q. That was between October 2011 and, as far as concerns</p> <p style="text-align: center;">Page 14</p>	<p>1 A. Sorry.</p> <p>2 Q. I know once it gets over to case submission and case</p> <p>3 building time --</p> <p>4 A. Yes.</p> <p>5 Q. -- your role comes to the fore there. Before that,</p> <p>6 before a file gets sent up, what are the main functions</p> <p>7 of a case officer?</p> <p>8 A. I would like to explain, there's an SIO, a Deputy SIO,</p> <p>9 myself then -- within the structure of an operation,</p> <p>10 normally you have a disclosure officer, a telephones</p> <p>11 officer, intelligence officer, if deemed necessary.</p> <p>12 Then you have got outside inquiries, people who conduct</p> <p>13 inquiries out on the ground.</p> <p>14 Q. Okay. Was yours mainly an office based function?</p> <p>15 A. Predominantly, yes. You might have to do observations</p> <p>16 at some point but in essence, yes, office bound.</p> <p>17 Q. In the list of people on the team, that you have</p> <p>18 described there, you said somebody is an intelligence</p> <p>19 officer.</p> <p>20 A. Yes.</p> <p>21 Q. What would the function of the intelligence officer be?</p> <p>22 A. Because how the force -- difference strands of</p> <p>23 intelligence comes into an operation --</p> <p>24 Q. Yes.</p> <p>25 A. -- some operations it might be deemed where it falls</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

1 **under -- within a folder that is password protected,**
 2 **that only certain people have access to that**
 3 **intelligence.**
 4 Q. That is talking about where a folder might be on
 5 a computer.
 6 **A. Yes.**
 7 Q. You were talking about an intelligence officer.
 8 **A. Yes.**
 9 Q. And I was asking: what is the function of the
 10 intelligence officer?
 11 **A. To collate the evidence and then, obviously, I would**
 12 **think, the SIO/Deputy SIO --**
 13 Q. Sorry, to stop you there, you said, "To collate the
 14 evidence"; do you mean the intelligence?
 15 **A. Intelligence, my apologies.**
 16 Q. That's all right.
 17 So, their function is to collate the intelligence;
 18 what does "collate the intelligence" mean?
 19 **A. Usually just store it within a folder.**
 20 Q. Okay, so they act as a receiver of intelligence from
 21 a variety of strands; is that right?
 22 **A. Correct. Yes, sir.**
 23 Q. We know that it can come in in a variety of ways, from
 24 a variety of sources --
 25 **A. Yes, sir.**

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1 Q. -- using a large number of GMP and national systems.
 2 **A. Yes, sir.**
 3 Q. Their function would be to collate it, you mean by
 4 that -- is this right? -- centralise it and order it in
 5 some way, so that it can be analysed?
 6 **A. Yes, well usually, depending when it is received, just**
 7 **like a chronological order of when that intelligence has**
 8 **been received.**
 9 Q. So it is organised by reference to when it is received?
 10 **A. Yes, sir.**
 11 Q. Rather than the date to which the intelligence relates?
 12 **A. Yes, sir.**
 13 Q. In Operation Shire, who was the intelligence officer?
 14 **A. Detective constable David Clark.**
 15 Q. DC Clark?
 16 **A. Yes.**
 17 Q. When are these roles allocated; right at the beginning?
 18 **A. The start, yes, the covert operation get allocated**
 19 **either a role or you'll do outside inquiries.**
 20 Q. Do people tend to fulfil these roles time and again, or
 21 is it like musical chairs, one time you are the
 22 disclosure officer and the next time you are --
 23 **A. So you are not complacent with one role, you will get**
 24 **swapped around, yes.**
 25 Q. You mentioned a disclosure officer --

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1 **A. Yes.**
 2 Q. -- are they appointed right from the start of the
 3 investigation?
 4 **A. Well, sometimes an operation might only last a day or**
 5 **two. In which case, the case officer will probably just**
 6 **submit the file lock, stock and do everything.**
 7 **If a job runs for weeks/months, then one is normally**
 8 **appointed at the start, which -- again, it was**
 9 **DC David Clark did disclosure -- telephones -- on the**
 10 **intelligence.**
 11 Q. I see. Did you have any responsibilities for the
 12 handling and collation of intelligence received by
 13 Operation Shire?
 14 **A. Not directly, sir, no.**
 15 Q. What about other than directly?
 16 **A. As a case officer, you come in in the morning, when your**
 17 **investigation is running, and as a case officer you**
 18 **would always check local intelligence on the OPUS**
 19 **system, just to see if any of your normal subjects have**
 20 **been arrested overnight and if there was any current or**
 21 **updated intelligence that police officers out on the**
 22 **street might have witnessed or observed.**
 23 Q. Okay, so you are talking there about just doing
 24 a sensible check, first thing in the morning, to see:
 25 have my subjects been lifted -- which is obviously quite

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1 important --
 2 **A. Yes, sir.**
 3 Q. -- or has some other intelligence, that is of relevance
 4 to our investigation, gone on to a system somewhere?
 5 **A. Yes, sir.**
 6 Q. I think we can see, in your casebook, some records of
 7 you doing that.
 8 **A. Yes, sir.**
 9 Q. It comes early on the page, tending to suggest it is one
 10 of the first things you do.
 11 **A. Usually, yes sir.**
 12 Q. Was that your job, to check the system first thing in
 13 the morning or did other people do it too?
 14 **A. Other people might look themselves, but if you are all**
 15 **working on the same operation, you might have -- two,**
 16 **three officers might look at the same nominals.**
 17 **Obviously you carry your nominals, so people might be**
 18 **allocated one person, you check, Aaron Corkovic's**
 19 **intelligence, you check David Totton's intelligence. It**
 20 **wouldn't be specific but me, as a case officer, I would**
 21 **always check myself.**
 22 Q. So you would just go through all of your subjects, in
 23 the morning?
 24 **A. Pretty much, sir, yes.**
 25 Q. Jamie Corkovic, Aaron Corkovic, David Totton,

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1 Robert Rimmer, Anthony Grainger, as the thing
 2 progressed?
 3 **A. As the operation moves on. Yes, sir.**
 4 Q. Yes, and just go through them like that and check?
 5 **A. Usually, you look at the arrest summary for the force**
 6 **overnight, to see if your subjects featured within the**
 7 **arrest summary, of all people arrested within GMP**
 8 **overnight. And then you look specifically at your**
 9 **subject nominals.**
 10 Q. If you discovered that something had happened, I mean
 11 short of arrest, some other intelligence, that you found
 12 on OPUS, what would you do with it?
 13 **A. Discuss it with the SIO and the Deputy SIO. If there**
 14 **was something pertinent or relevant, then discuss it**
 15 **with the members of the team.**
 16 Q. Would that pertinent or relevant intelligence go on to
 17 anything, on to any document?
 18 **A. Again, it might go on the intelligence matrix, but**
 19 **I don't think in Operation Shire there was anything of**
 20 **relevance during -- while the operation ran.**
 21 Q. You describe something called the "intelligence matrix"
 22 there --
 23 **A. That DC Clark had ownership of, yes.**
 24 Q. What was the matrix?
 25 **A. It was just a folder within a computer system.**

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1 Q. Yes.
 2 **A. Headed "Intelligence" which only certain people had**
 3 **access to.**
 4 Q. Did you have access to it?
 5 **A. I didn't, sir, no.**
 6 Q. But do you know what was in it?
 7 **A. Certain things, yes, sir. But, other things, maybe not,**
 8 **sir, because I might not need to know what the**
 9 **intelligence was, sir.**
 10 Q. Where was the matrix kept; on what system?
 11 **A. Again, it is just within a GMP sort of, like, system**
 12 **within Operation Shire, operational folder, at the time.**
 13 Q. So it was accessible from your desktops --
 14 **A. Yes, sir.**
 15 Q. -- in a drive, in a sub folder, headed "Intelligence";
 16 is that right?
 17 **A. That's correct, sir.**
 18 Q. You didn't have access to it; is that right?
 19 **A. Password protected. I didn't have the password, sir,**
 20 **no.**
 21 Q. We are going to hear, in due course, about something
 22 called the "intelligence chronology".
 23 **A. I think that is the same thing, sir. I think probably**
 24 **the same thing, to be honest.**
 25 Q. Right. I want to try and separate out two possibly

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1 different things here.
 2 **A. Okay.**
 3 Q. One, the intelligence chronology -- and I wonder whether
 4 we can look at that. I am going to look at it in
 5 a couple of forms. If you look at page 653, please, in
 6 the bundle; do you have that?
 7 **A. Yes, sir.**
 8 Q. Thank you. Just have a look between pages 653 and 662.
 9 It may not mean much because there is a lot of it
 10 redacted, but just look at the way the document looks,
 11 its marking. In fact, there is some information, on
 12 654, if you look at that, in terms of the way the thing
 13 is set out.
 14 **A. Yes, sir.**
 15 Q. Additionally, there is some information, on page 660.
 16 Maybe if you just look at that.
 17 **A. Yes, sir.**
 18 Q. Under the redaction there, there is a reference number
 19 and a rating.
 20 **A. Yes, sir.**
 21 Q. This has been called the "Intelligence chronology", not
 22 surprisingly because at the head of it, in capital
 23 letters, it says, "Intelligence chronology".
 24 **A. Yes, sir.**
 25 Q. Had you seen this document in the course of the

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1 operation?
 2 **A. Not prior to now, sir.**
 3 Q. Yes, so is this the document you understand to have been
 4 the responsibility of DC Clark on the system, password
 5 protected?
 6 **A. I could only assume, sir, but yes.**
 7 Q. Right.
 8 Was there an Excel spreadsheet kept?
 9 **A. In what respect, sir?**
 10 Q. In Operation Shire.
 11 **A. What we would tend to do with a live operation, it is**
 12 **called just a database spreadsheet, so anything,**
 13 **surveillance chronology. It would be a list of**
 14 **statements, exhibits, actions, and a telephone document**
 15 **where subjects have been seen to use the telephones at**
 16 **specific times, and that was probably it, sir.**
 17 Q. So I am imagining an Excel spreadsheet with, along the
 18 bottom left-hand side, some tabs.
 19 **A. A number of tabs, yes, sir.**
 20 Q. Tabs you could click on, and one would be a statement
 21 tab and that would give you a list of all the
 22 statements.
 23 **A. Yes, sir.**
 24 Q. Another one with documents or exhibits, and that would
 25 give you the documents or exhibits. One, telephony or

Page 24

1 telephones and that would give you a list of telephone
 2 information.
 3 **A. Yes, sir.**
 4 Q. Was there a tab on there with intelligence?
 5 **A. There might have been a tab, sir, but I know it would**
 6 **not have been populated because we had a separate**
 7 **intelligence officer. It is the sort of standard**
 8 **spreadsheet that most operations will probably utilise**
 9 **because it is straightforward. And if you want an easy**
 10 **point of reference, it is something you can look at,**
 11 **sir.**
 12 Q. So you think there probably would have been a stab with
 13 intelligence, but you don't think it was populated?
 14 **A. I don't think there was the intelligence tab, sir,**
 15 **because, like I said, they would have a separate**
 16 **intelligence officer, so it would be defunct. There**
 17 **would be nothing within that folder.**
 18 Q. What about intelligence that falls short of justifying
 19 retention on the sensitive intelligence chronology;
 20 where was that catalogued and collated?
 21 **A. I would imagine, again, the intelligence documents -- we**
 22 **didn't have specific -- any other folders.**
 23 Q. Not all intelligence was so sensitive that it required
 24 to go on to the intelligence chronology, presumably?
 25 **A. If it was not deemed -- if it was sort of like open**

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1 **intelligence from like, say, if a police officer sees a**
 2 **car driving past and occupants on board, it probably**
 3 **wouldn't get logged because it doesn't really tell you**
 4 **anything evidentially.**
 5 Q. Why were you checking each morning, then?
 6 **A. Like I say, the initial points made sure that people**
 7 **hadn't been arrested overnight.**
 8 Q. So, the intelligence that you were looking for, each
 9 morning, wasn't really intelligence, it was just had
 10 somebody been arrested?
 11 **A. Yes, sir, because it might impact if, like, you'd got**
 12 **surveillance activity, that is going to impact on what**
 13 **is going to happen during your working day.**
 14 Q. You didn't make any additions to or changes to this
 15 intelligence chronology?
 16 **A. No, sir.**
 17 Q. In some of his evidence, Mr Cousen suggested that you
 18 scanned GMP intelligence systems daily and added items
 19 to the intelligence chronology; that is not right, is
 20 it? That was the function --
 21 **A. I might have told DC Clark if something needed updating,**
 22 **but it would have been -- because I didn't have access**
 23 **to that specific intelligence document. Or if it is**
 24 **something I deemed important, I might have copied and**
 25 **pasted, maybe emailed Mr Cousen. But, to my**

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1 **recollection, I wouldn't have access to that**
 2 **intelligence chronology.**
 3 Q. Who was your line manager, please?
 4 **A. Detective Sergeant Hurst.**
 5 Q. How many operations or investigations were you engaged
 6 in at this time, between October and March?
 7 **A. Being designated case officer, my time would have been**
 8 **specific to Operation Shire. There might have been**
 9 **other jobs running in the office and, at short notice,**
 10 **it might have been all hands to the pump if you are**
 11 **turning out on a specific job. But, in essence, I was**
 12 **seconded on Operation Shire.**
 13 Q. So there might be some reactive or responsive jobs if
 14 there was a robbery that you had to turn out to?
 15 **A. They might need a number of staff, yes, sir.**
 16 Q. But you were dedicated for that five-month period to
 17 this investigation on a proactive basis alone?
 18 **A. Yes, sir. It is quite time consuming.**
 19 Q. What was your involvement in Operation Ascot in 2006?
 20 **A. None at all, sir. I was not into the robbery unit at**
 21 **the time. I have been made since aware, when the**
 22 **operation was running, about aspects of Operation Ascot,**
 23 **but I was not actively involved in Operation Ascot.**
 24 Q. You were not in it at all?
 25 **A. No, sir.**

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1 Q. Okay.
 2 If you just look at page 4 of your witness
 3 statement, please.
 4 **A. Statement 1, sir?**
 5 Q. No, it is statement 3, so page 4.
 6 THE CHAIRMAN: Of the bundle you have.
 7 **A. Thank you, sir. Yes, sir.**
 8 MR BEER: If you look at the third paragraph, the one
 9 beginning:
 10 "David Totton, Anthony Grainger and others ..."
 11 It says they were involved in Operation Ascot in
 12 2006.
 13 **A. Yes, sir.**
 14 Q. You say, in the third sentence:
 15 "On one occasion, during this operation, I am aware
 16 that both David Totton and Anthony Grainger were in
 17 separate stolen vehicles on false plates with others,
 18 driving towards Culcheth. It was believed, at the time,
 19 they were planning to commit a robbery/act of
 20 criminality. At this time, they were the subject of
 21 aerial surveillance."
 22 **A. Yes, sir.**
 23 Q. Is this statement, in which that paragraph was included,
 24 was this prepared for the purposes of the defence of
 25 Sir Peter Fahy?

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1 **A. It might have been, sir. I know --**
 2 Q. If you look at the date?
 3 **A. Yes, sir, I have seen the surveillance footage around**
 4 **this, where stolen cars do get moved and nominals are**
 5 **seen on the footage, so I have probably made the**
 6 **statement on the basis of watching that surveillance**
 7 **footage.**
 8 Q. The statement, as we can see, is dated mid-2014, so it
 9 looks from the chronology as if it was prepared for the
 10 purposes of --
 11 **A. I would imagine so, sir, yes.**
 12 Q. So, you were saying this on the basis of -- is it what
 13 somebody told you?
 14 **A. I spoke to Detective Sergeant Mulverhill, who was a case**
 15 **officer for Operation Ascot. Because under this sort of**
 16 **involvement, where a nominal is mentioned, I think it**
 17 **did go to CPS but said it didn't pass the threshold**
 18 **test.**
 19 Q. So you are including in this statement here something
 20 that DS Mulverhill told you?
 21 **A. He was a case officer on Operation Ascot, yes, sir.**
 22 Q. When did he tell you this?
 23 **A. I can't remember the specific date but, like I say,**
 24 **I think he got the old Ascot file from deep storage,**
 25 **read through the paperwork relevant to this involvement**

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1 **and saw the surveillance footage.**
 2 Q. Was that in 2014?
 3 **A. I would imagine so, sir, yes.**
 4 Q. Right, so it wasn't before the death of Mr Grainger,
 5 in March 2012?
 6 **A. No, sir.**
 7 Q. Right. On what you have described here, you say that it
 8 was believed that they -- that is Mr Totton and
 9 Mr Grainger -- were planning to commit a "Robbery/act of
 10 criminality"; what did the act of criminality, as
 11 distinct from a robbery refer to?
 12 **A. Criminality can fall in all sorts of scenarios --**
 13 **burglaries, assaults. There are a number of issues**
 14 **around where acts of criminality are actually ...**
 15 Q. Yes, so it could be anything, any crime?
 16 **A. Yes, sir.**
 17 Q. It sounds from that that the officers in
 18 Operation Ascot, at least when Mr Mulverhill was
 19 describing it to you, didn't have a clear idea of what
 20 the suspects were doing in Culcheth, other than it was
 21 suspected to be criminal in some way; is that right?
 22 **A. I can't remember exactly the conversation with**
 23 **DS Mulverhill, but if it was his assumption that some**
 24 **sort of criminal act was going to be taken -- but**
 25 **I cannot make a statement on what somebody else has said**

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1 **or thought at the time.**
 2 **I saw the surveillance footage, around the stolen**
 3 **cars being moved, and certain nominals getting into**
 4 **stolen vehicles.**
 5 Q. Could we look, please, at folder C. So that is not the
 6 one in front of you. Folder C, at page 727.
 7 Just tell me when you are --
 8 **A. Page 717?**
 9 Q. 727.
 10 **A. Yes, sir.**
 11 Q. Can you see, this is part of Mr Grainger's OPUS profile?
 12 **A. Okay, sir.**
 13 Q. Can you see, on that page, a list of crimes?
 14 **A. Yes, sir.**
 15 Q. That he has -- I am not sure how to put this
 16 neutrally -- been associated with in some way?
 17 **A. Yes, sir.**
 18 Q. Can you see that there is one for 2006?
 19 **A. The robbery business, yes, sir.**
 20 Q. Do you know whether that is the crime, or suspected
 21 crime, that Mr Mulverhill was telling you about?
 22 **A. I couldn't, sir.**
 23 Q. As far as I can see, there is only one crime on his OPUS
 24 record for 2006.
 25 **A. I mean, I don't know if that is relevant to**

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1 **Operation Ascot.**
 2 Q. No. But if he was suspected of robbery in the way that
 3 you have described, when driving in Culcheth with
 4 Mr Totton, you would expect that to go on to OPUS,
 5 wouldn't you?
 6 **A. If it was deemed the crime had been committed, then yes,**
 7 **sir.**
 8 Q. Sorry, what does that mean, "if it is deemed that
 9 a crime has been committed"; who does the deeming?
 10 **A. Obviously, the officers working Operation Ascot. If**
 11 **they believed he was part of a conspiracy at the time,**
 12 **a business robbery, then a crime would have been**
 13 **submitted, or he would have featured within a crime --**
 14 **because then you can see at the end it says,**
 15 **"Eliminated". That crime might refer to Operation Ascot**
 16 **and the other nominals who were arrested under**
 17 **Operation Ascot, but I don't know, sir.**
 18 Q. What we can say then, is either the officers did not
 19 have sufficient suspicion to create an OPUS record,
 20 or --
 21 **A. Or he might have been shown as a suspect on that crime**
 22 **and then, obviously, if nothing happened --**
 23 Q. He would have been eliminated from it.
 24 **A. Yes, sir.**
 25 Q. They are really the two possibilities, are they? There

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<p>1 was not even sufficient suspicion to put him on OPUS, or 2 if it was, and it is this one, he was subsequently 3 eliminated. 4 A. Yes, sir. 5 Q. Thank you. 6 Thank you, yes. We can put that file away now. 7 A. Thank you. 8 Q. Is it right that there came a time when Operation Shire 9 was split, effectively? 10 A. Yes, sir. From October 2011, we concentrated -- like 11 I mentioned before -- aspects of the Corkovic family. 12 And then, in January, it then split two directions, to 13 the Corkovics and then Mr Totton, Mr Rimmer and 14 Mr Grainger. 15 Q. Whose decision was it to split? 16 A. It was split because -- 17 Q. That is a different question. That a because. Whose 18 decision was it? 19 A. Probably the SIO's. 20 Q. Right. Then, the answer to the question that I think 21 you were about to answer, why was it split? 22 A. But then I know since after January we still conducted 23 observations and surveillance around the Corkovic side 24 of it. There are still dates, after January, we were 25 watching Corkovics.</p> <p style="text-align: center;">Page 33</p>	<p>1 Q. Exactly. 2 What was the consequence of that? 3 A. Well, again, because it still fell under the umbrella of 4 Operation Shire, so observations were maintained on 5 occasions with the Corkovics. 6 Q. Yes. 7 A. It was only probably after 3 March, when it then got 8 referred to Shire 2, which then concentrated on the 9 Corkovics. 10 Q. Is this realisation that they were acting separately and 11 independently from each other -- 12 A. Yes, sir? 13 Q. Is a consequence of that that intelligence concerning 14 the Corkovics should not be taken into account when 15 assessing the risk posed, if any, by Mr Totton, 16 Mr Grainger and Mr Rimmer? 17 A. The assumption -- yes, sir, because we would -- we'd 18 never seen them associating together. 19 Q. So, if there are pieces of intelligence received that 20 show that the Corkovics present a risk to the public or 21 police officers -- 22 A. Yes, sir? 23 Q. -- whether by possession of weapons or otherwise, that 24 is not intelligence that, after the split, should really 25 be taken into account in judging the risk posed by</p> <p style="text-align: center;">Page 35</p>
<p>1 Q. That is in fact another question. That is: did 2 observations carry on despite the split? 3 A. Yes, sir. 4 Q. Let's go back to the question: what was the reason for 5 it splitting? 6 A. Because the Corkovics had not seemed to be associating 7 with the other members of Operation Shire, the other 8 nominals. 9 Q. You have given us a reason then that they were seen not 10 to be associating. 11 A. Yes, sir. 12 Q. Was that through observation? 13 A. Yes, sir. 14 Q. Is it right that the intelligence also supported that 15 decision; that it was believed that they may not be 16 operating together? 17 A. Yes, I think the initial intelligence was about 18 Aaron Corkovic and David Totton planning, committing 19 robberies, that is how the job started, in essence. We 20 ran observations on the Corkovics, never associated with 21 David Totton, Robert Rimmer or Anthony Grainger. 22 Q. So, by the time of the decision to split, was it the 23 belief of the operation that the Corkovics were acting 24 separately from -- 25 A. Independently away from this group, yes, sir.</p> <p style="text-align: center;">Page 34</p>	<p>1 Mr Totton, Mr Grainger and Mr Rimmer? 2 A. Well, I suppose, like, you could never make assumptions 3 because, with working on other jobs, people do drop in 4 and out of robbery teams, where somebody might last 5 minute be called into a team, so that risk is still 6 a potential risk. 7 Q. But your operation's working basis was that they were 8 working entirely separately and independently of each 9 other after this time? 10 A. Yes, sir. 11 Q. You say, in your statement, that this was in January 12 that the split took place. 13 A. Probably, sir, because I think initially we struggled to 14 house David Totton, who was quite elusive. 15 Q. He was in Thailand for three weeks, as well, wasn't he? 16 A. For a length of time, sir, yes. 17 Q. I think we have -- we need not turn it up now -- in your 18 casebook, him returning to the United Kingdom, on 19 13 January; does that sound about right? 20 A. Yes, sir. 21 Q. You had his flight details -- 22 A. Yes, sir. 23 Q. -- and began surveillance on him thereafter. 24 A. Yes, sir. 25 Q. How did you date it, when you were providing your</p> <p style="text-align: center;">Page 36</p>

<p>1 statement, that it was -- I think you say, "Actually, in 2 or around January 2012". If I was to suggest to you 3 that that may be slightly out and it was more towards 4 the end of February that the split occurred? 5 A. The end of February? 6 Q. Sorry, the end of January, into February. 7 A. Yes, sir. 8 Q. Thank you. 9 Turning to a different subject, did you have 10 responsibility for obtaining subject profiles for 11 David Totton and Robert Rimmer? 12 A. No, sir. 13 Q. Did you see the subject profiles of David Totton and 14 Mr Rimmer? 15 A. No, sir. 16 Q. Do you know what I am referring to when I am referring 17 to "subject profiles"? 18 A. The nominal profile, yes, sir. 19 Q. Yes. You didn't read them? 20 A. No, sir. 21 Q. Why was that? 22 A. For the case officer, once a nominal came into the 23 operation, I would, like, conduct research of my own 24 around that person. There would be no necessity to read 25 a subject or a nominal profile.</p> <p style="text-align: center;">Page 37</p>	<p>1 profiles are very unimportant? 2 A. Well, within our operation, within our group, then, they 3 weren't important. 4 Q. So why were they obtained? 5 A. I think it is like standard operational procedure, where 6 the SIO will request nominal profiles because sometimes 7 you might struggle to house a person or see people's 8 financial records. So there are certain checks we 9 probably cannot perform, that the FIB do for these 10 checks. 11 Q. What were the checks they could perform that you 12 couldn't? 13 A. At the time, I think most constables could not access 14 the COPU system, that is something that come in later, 15 and, again, like Experian checks, I mean like PNC and 16 OPUS checks, then our office would conduct our own 17 checks. 18 Q. Similarly for Mr Grainger, when his subject profile was 19 obtained, I think you are aware that it was obtained? 20 A. Yes, sir. 21 Q. I think I have you on the emails and on the CLIO 22 management system as being involved in -- 23 A. I mean, the CLIO system -- 24 Q. -- obtaining it. 25 A. Yes, sir.</p> <p style="text-align: center;">Page 39</p>
<p>1 Q. What is the purpose of the subject profile? 2 A. I think, at the time, it was down to the FIB to produce 3 profiles and now, since, they probably don't. It is 4 done independently to whichever unit you work within, 5 but I know they did produce nominal profiles. 6 Q. That is another question. 7 A. Sorry, sir. 8 Q. That is all right. What was the purpose of the 9 production of subject profiles? 10 A. Again, with most operations, whether -- sort of subjects 11 within that operation, nominal profiles are always 12 obtained. 13 Q. So is it, what, "It is custom and practice to do it, so 14 we always do it"? 15 A. Well, I always say, worst case, if no one is on duty and 16 something happened in the early hours of the morning, if 17 somebody had access to them profiles, they might get 18 a brief overview of what that nominal is about. 19 THE CHAIRMAN: A brief overview? 20 A. Yes, sir. 21 MR BEER: So they were a very unimportant document? 22 A. I don't know about the importance or relevance because, 23 like I say, since -- like, we do our own profiles. 24 Q. I am just talking about then, now. The impression that 25 you are leaving me with, at least, is that subject</p> <p style="text-align: center;">Page 38</p>	<p>1 Q. What was the purpose of obtaining it? 2 A. Like I said, if somebody new comes into an operation, 3 again, I think it is standard operational procedure that 4 the nominal profile will be requested. 5 Q. You didn't read his either? 6 A. No, sir. 7 Q. Do you know whether anyone read it? 8 A. I can't answer. I can't answer that, sir. 9 Q. If it was a document of the comparative lack of 10 importance that you describe, do you think anyone will 11 bother looking at it? 12 A. I don't know, sir. 13 Q. Just to summarise then, the operation obtained subject 14 profiles because it was the way that it had always been 15 done. 16 A. Yes, sir. 17 Q. You didn't look at them because you were more concerned 18 with the intelligence that you were finding. 19 A. Or if something is running live, you are reacting to 20 intelligence. And, like I say, conducting our own 21 checks. 22 Q. I think you have been probably been involved in 23 operations before, where a firearms team has been 24 involved? 25 A. Numerous times, sir, yes.</p> <p style="text-align: center;">Page 40</p>

1 Q. And they required briefing about the subjects?
 2 **A. Yes, sir.**
 3 Q. Presumably then, the information that the firearms team
 4 should be provided with --
 5 **A. Yes, sir.**
 6 Q. -- would be the information that has been gathered by
 7 the operational team?
 8 **A. Yes, sir.**
 9 Q. Would that be drawn together in a package?
 10 **A. I don't know, sir. I never went to a firearms sort of**
 11 **briefing, personally, sir, so I couldn't answer that**
 12 **question.**
 13 Q. You were, I think, responsible for maintaining records
 14 of and management of documents --
 15 **A. Yes, sir.**
 16 Q. -- that were generated within the course of the
 17 investigation?
 18 **A. Yes, sir.**
 19 Q. And we can see throughout CLIO -- I am not going to take
 20 you through it -- you say, "Look, we have this, the
 21 investigative assessment, that is going to be
 22 document 7."
 23 **A. Yes, sir.**
 24 Q. Or "We have a dedicated surveillance authority, that is
 25 going to be document 27, it is filed here" or "it's

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1 filed there."
 2 **A. Yes, sir.**
 3 Q. Did you, in your time as an officer on the robbery
 4 squad, ever see documents which were bespoke briefings
 5 in writing, created by the robbery squad, for briefing
 6 up of a firearms team?
 7 **A. Not at the time, sir, but I know now procedures change**
 8 **and there is a separate nominal profile and a separate**
 9 **profile for firearms risk.**
 10 Q. When did that come in?
 11 **A. I don't know, sir.**
 12 Q. At this time, there wasn't, or at least you never saw,
 13 a document that pulled the threads together over, in
 14 this case, a five-month investigation with multi strands
 15 of intelligence and analysis and handed that over to
 16 a firearms cadre?
 17 **A. That would be something for the SIO, who would approach**
 18 **firearms with relevant intelligence and information.**
 19 Q. I am just asking you, at the moment: you never saw such
 20 a document?
 21 **A. No, sir.**
 22 Q. What would you think about handing over the subject
 23 profiles instead? Would they be a good substitute for
 24 the five months, in this case, analysis?
 25 **A. I suppose that would all depend how current that profile**

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1 **was.**
 2 Q. But I thought you said, at the moment, that you didn't
 3 even bother looking at them, you were more interested --
 4 **A. Well, you are asking me a question: if I thought that --**
 5 **would that be necessary or relevant if somebody is,**
 6 **like, provided the subject profile.**
 7 **But I have never been in that situation, sir, so**
 8 **I don't know.**
 9 Q. You answered my question by saying it would depend on
 10 how current they were.
 11 **A. Probably, sir, yes.**
 12 Q. So it might be okay to hand over a subject profile that
 13 is up to date?
 14 **A. I don't know if it would be okay. Again, I think that**
 15 **would be something for the SIO to discuss with the**
 16 **firearms cadre.**
 17 Q. Had you any experience of SIOs getting ready to brief
 18 a firearms team?
 19 **A. Not personally, sir, no.**
 20 Q. But maybe approaching, you would say, "Look, this is
 21 going to be a deployment in this case, I am going to
 22 have to provide some sort of briefing to the silver".
 23 **A. Again, the SIO, or the Deputy SIO. But, again, I was**
 24 **not privy to any such briefings.**
 25 Q. I am not asking you whether you were in them, I was

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1 talking about getting ready for them, preparing
 2 themselves for such a briefing.
 3 **A. No, sir, no involvement.**
 4 Q. They have never spoken to you and said, "Look, I want to
 5 try and [as I have put it] pull the threads together, to
 6 try and distill down everything that we have learnt
 7 because we have been following these people, we have
 8 been conducting intrusive investigations into these
 9 people, we have lived and breathed with these people for
 10 five months. We are going to hand over this operation
 11 effectively"?
 12 **A. No, sir, the boss might not be in the office, as there**
 13 **was Inspector Cousen, he's over at firearms, so**
 14 **I wouldn't be privy to it, sir, no.**
 15 Q. So you have never experienced SIOs effectively coming to
 16 the rest of the team and saying, "Look, it is going to
 17 a firearms deployment. We are going to need to hand
 18 something over"?
 19 **A. No, sir.**
 20 Q. You mentioned something since then, a document that is
 21 created --
 22 **A. Again, because, like, the FIB don't take ownership of**
 23 **producing nominal profiles. If we run an operation**
 24 **ourselves, we will create -- there's a template of**
 25 **a document, which you just populate.**

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1 Q. And you --

2 **A. There is a bespoke one for firearms assessment.**

3 Q. What is bespoke about it?

4 **A. Again, it is all dependent on each case, each**

5 **individual. If they have got masses of warnings for**

6 **firearms, you might have, like, gang members who are**

7 **often seen or there is intelligence suggesting they are**

8 **using firearms, which is -- there are just two separate**

9 **documents. You've got a normal nominal profile and the**

10 **firearms profile.**

11 Q. What is the difference between the normal and the

12 firearms?

13 **A. The firearms will probably contain more boxes to**

14 **populate.**

15 Q. It has more boxes on it.

16 **A. About the risk and assessments around any sort of**

17 **firearms risk.**

18 Q. All right, okay.

19 That was in place after Mr Grainger's death; is that

20 right?

21 **A. I think some time after, sir, yes.**

22 Q. Thank you.

23 What do you understand a PNC warning marker for

24 "violent" to indicate?

25 **A. Obviously, on the police national computer, which is the**

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1 **national computer of people arrested for certain**

2 **offences, they might be given warning markers.**

3 Q. Yes? But for "violent", what does it mean?

4 **A. Well, what is violence? It could be pushing somebody or**

5 **it could be stabbing somebody, a wide spectrum.**

6 Q. It indicates a wide spectrum of possible violence?

7 **A. Yes, sir.**

8 Q. Okay. Do you understand such warning markers to be

9 arrest based or conviction based?

10 **A. I don't think there is any difference. If somebody is**

11 **arrested for violence, might not be convicted for**

12 **violence, the marker would still be on the system.**

13 Q. Okay, so even if they are acquitted of it, it still

14 stays on there, as you understand?

15 **A. Yes, sir.**

16 Q. Okay.

17 You have seen, I suspect, such warning markers.

18 **A. Yes, sir.**

19 Q. I wonder whether we could turn up Mr Grainger's profile,

20 please. It is at page 674 of your bundle.

21 **A. Yes, sir.**

22 Q. Can you see, that is the pen picture that was provided

23 to Operation Shire by the Force Intelligence Branch on

24 7 February 2012?

25 **A. Yes, sir.**

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1 Q. It is dated 20 September 2011.

2 Do you know who, within the investigation, had any

3 responsibility, if any, to update this?

4 **A. I didn't, sir, no. As I said, I had not read this**

5 **document only -- until recently, so I don't know whose**

6 **responsibility it would fall on.**

7 Q. I think you saw it on email at the time, presumably, but

8 may be didn't open it up; is that what you are saying?

9 **A. Probably, sir, yes.**

10 Q. Do you know whether anyone had a responsibility for

11 updating it?

12 **A. I think, from the email thread, it might have gone to**

13 **the Deputy SIO, to Sergeant Hurst. But I don't think it**

14 **was, like, anybody's deemed responsibility to up date**

15 **that document. Like it says on the front, it is a pen**

16 **picture.**

17 Q. What is a "pen picture"?

18 **A. I don't know. Like, to me, it is almost like a nominal**

19 **profile. I don't know where pen pictures come from,**

20 **sir.**

21 Q. No.

22 You have read it recently, and what did you think of

23 it?

24 **A. Again, it just gives you, like, an overview of -- at the**

25 **time of Anthony Grainger, sir.**

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1 Q. What did you think of its quality?

2 **A. Again, because I am not properly au fait with -- at the**

3 **time, it was deemed FIB submitted these. It is just**

4 **a history of Anthony Grainger.**

5 Q. It is not really just a history of him, is it? It has

6 some details, but there a risk assessment of him there,

7 at page 676.

8 **A. Yes, sir.**

9 Q. How closely have you read it recently? I don't want to

10 ask you questions which are unfair if you have not read

11 this in detail.

12 **A. I have not read it in detail, sir.**

13 Q. As far as you understand it, it went to the Deputy SIO,

14 Deborah Hurst --

15 **A. Who requested it. Like I say, it's standard operational**

16 **procedure, requested nominal profiles for anybody really**

17 **who came into the operation.**

18 Q. You are not sure who, if anyone, had the responsibility

19 of updating it but, if anyone, it was DS Hurst; is that

20 right?

21 **A. Again, I can't answer who had direct responsibility to**

22 **update it, I just know it was not me, sir.**

23 Q. Okay, I think one of your other responsibilities was

24 contact with the Crown Prosecution Service?

25 **A. Yes, sir.**

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<p>1 Q. Is that right?</p> <p>2 A. Yes, sir.</p> <p>3 Q. At the pre-charge stage, who had principal</p> <p>4 responsibility for liaison with the CPS?</p> <p>5 A. Probably, at the time, myself, sir.</p> <p>6 Q. I think if we look at page 37 of your bundle there, this</p> <p>7 is page 27 of your casebook --</p> <p>8 A. Yes, sir.</p> <p>9 Q. -- we can see, on an entry for 13 December 2011,</p> <p>10 Nicky Moore's name, at the top right-hand side of</p> <p>11 page 27; yes?</p> <p>12 A. Yes, sir.</p> <p>13 Q. It says "nicky.moore", and in fact that is the rest of</p> <p>14 her email address underneath there?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Why were you recording her details as early as</p> <p>17 13 December?</p> <p>18 A. Because when you have the live operation running, you</p> <p>19 might get asked by the supervising officer, "This</p> <p>20 operation is running, is there enough evidence at</p> <p>21 present to arrest them nominals?"</p> <p>22 Q. I think she was a senior crown prosecutor; is that</p> <p>23 right?</p> <p>24 A. I believe so, yes.</p> <p>25 Q. Based at Sunlight House in Manchester?</p> <p style="text-align: center;">Page 49</p>	<p>1 compromise with a surveillance unit, they make off at</p> <p>2 speed, jumping red lights. So, through that, we take</p> <p>3 the evidence at the time, take the evidence to the CPS</p> <p>4 to see if there is enough to meet the threshold to</p> <p>5 arrest people.</p> <p>6 Q. Okay, so at this time, it would have been in relation to</p> <p>7 the Corkovics?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Did there come a time when, after the split of the</p> <p>10 operation, you had contact with her in relation to</p> <p>11 Mr Totton, Mr Grainger, and Mr Rimmer?</p> <p>12 A. Yes, sir. Yes.</p> <p>13 Q. Can we look, please, at an email, which I think is in</p> <p>14 bundle W, at page 423.</p> <p>15 A. Yes, sir.</p> <p>16 Q. This is an email, dated 20 February 2012.</p> <p>17 A. Yes, sir.</p> <p>18 Q. From you to Nicky Moore; is that right?</p> <p>19 A. Yes, sir.</p> <p>20 Q. We can see that an attachment to your email is an MG3 in</p> <p>21 relation to Operation Shire?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Is that the document that is on pages 424 through to --</p> <p>24 A. 428, sir.</p> <p>25 Q. -- 429.</p> <p style="text-align: center;">Page 51</p>
<p>1 A. Yes, sir.</p> <p>2 Q. She has given some evidence in a witness statement,</p> <p>3 which the Inquiry has, that at the end of 2011 and into</p> <p>4 2012, she had a number of meetings with the SIO,</p> <p>5 Mr Cousen, and the case officer, you; is that right?</p> <p>6 A. I don't remember physical meetings, or we might have</p> <p>7 spoke over the telephone, but I don't remember meetings</p> <p>8 per se, sir.</p> <p>9 Q. You don't remember physically attending a meeting with</p> <p>10 her?</p> <p>11 A. If she had have been local to, like, where we work,</p> <p>12 I can't remember, sir.</p> <p>13 Q. Right. Did you ever speak to her alongside DI Cousen,</p> <p>14 ie a three person meeting or three person telephone</p> <p>15 conversation?</p> <p>16 A. Again, I can't recall, sir.</p> <p>17 Q. At this stage, early 2012 -- so very late 2011, early</p> <p>18 2012 -- what was the purpose of any contact with her?</p> <p>19 A. Again, because I know, around that time, in December, we</p> <p>20 had seen, like, the Corkovics out of a car, in a stolen</p> <p>21 car following, like, a cash van around Cheadle. And</p> <p>22 I think, the following day, getting changed into</p> <p>23 waterproof clothing on a street in Prestwich, so then</p> <p>24 you think: things are escalating and a job might occur.</p> <p>25 I don't think -- I think maybe there was a</p> <p style="text-align: center;">Page 50</p>	<p>1 A. Sorry, my apologies.</p> <p>2 Q. Reading your email, you say:</p> <p>3 "Nicky, I have attached a current MG3."</p> <p>4 Tell the chairman what an MG3 is, please?</p> <p>5 A. It is a document that police officers will submit to the</p> <p>6 CPS to see if there is enough evidence to reach the</p> <p>7 threshold test to arrest the subjects and take the</p> <p>8 evidence to, like, the submission of file.</p> <p>9 Q. So it is a report to the Crown Prosecution Service</p> <p>10 asking them for a charging decision.</p> <p>11 A. Yes, sir.</p> <p>12 Q. It summarises, amongst other things, the evidence that</p> <p>13 you have so far obtained.</p> <p>14 A. Yes, sir.</p> <p>15 Q. You continue:</p> <p>16 "And, in particular, the Totton side of the</p> <p>17 operation. I am currently reluctant to create an open</p> <p>18 ICIS case tree."</p> <p>19 What is ICIS?</p> <p>20 A. It is just a custody system, where submitted files go on</p> <p>21 to an ICIS case summary. Where it's, like -- any sort</p> <p>22 of submitted file to CPS go on to ICIS.</p> <p>23 Q. It is a custody system that you would ordinarily upload</p> <p>24 this MG3 to?</p> <p>25 A. Yes, sir. You get like a file reference, and everything</p> <p style="text-align: center;">Page 52</p>

1 **would fall under that file reference.**
 2 Q. I see.
 3 You were reluctant due to:
 4 "The nominals involved and the covert nature of the
 5 investigation."
 6 **A. Yes, sir.**
 7 Q. So that was to guard against the possibility of
 8 accidental or deliberate compromise by a police officer
 9 or a CPS employee?
 10 **A. Yes, sir.**
 11 Q. "However, Justin will create a pre-arrest case tree and
 12 I will email you the reference number later tonight or
 13 tomorrow, when it is created. I am only sending this
 14 now in case we need to approach a firearms team for
 15 further assistance, as the superintendent will always
 16 ask if there is enough evidence to arrest and charge at
 17 present."
 18 **A. Yes, sir.**
 19 Q. Do you see that?
 20 **A. Yes, sir.**
 21 Q. The sentence:
 22 "The superintendent ..."
 23 There you are referring to the silver commander; is
 24 that right?
 25 **A. Yes, sir.**

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1 Q. You say:
 2 "They will always ask if there is enough evidence to
 3 arrest and charge at present."
 4 They will always ask before doing what?
 5 **A. Any sort of firearms deployment. It is enough evidence
 6 to arrest nominals within Operation Shire, then you
 7 take -- you take that stance.**
 8 Q. So they will want to know that before what?
 9 **A. Deploying firearms.**
 10 Q. So they will want to know whether there is enough
 11 evidence to arrest or charge before deploying the
 12 firearms?
 13 **A. Yes, sir.**
 14 Q. By that, you mean they will want to know that there is
 15 enough evidence to arrest and charge before deploying
 16 firearms?
 17 **A. Well, no, because if there is enough, you wouldn't even
 18 go to firearms, you would just arrest the nominals.**
 19 Q. But you might need a firearms team to arrest them,
 20 presumably?
 21 **A. Under circumstances, yes, sir. Or under -- like I say,
 22 each case is judged by its own merits. If they said,
 23 "Yes, there is enough evidence to arrest at time", we
 24 just try and arrest people, like, in the early hours of
 25 the morning.**

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1 Q. I am sorry, I am not following then.
 2 So, you are saying: when we approach a firearms
 3 team, the silver commander is always going to ask
 4 whether there is enough evidence to arrest?
 5 **A. Yes, sir.**
 6 Q. So, he wants to know that there is not enough evidence
 7 to arrest before authorising a deployment?
 8 **A. I think so, sir, yes.**
 9 Q. Why does he want to know that there is not enough
 10 evidence to arrest before authorising a deployment?
 11 **A. Well, at the time, depending what the intelligence is
 12 and if CPS have deemed there is not enough to pass the
 13 threshold, then if we are running a live operation and
 14 it is deemed by the SIO that firearms support is needed,
 15 then the next step then is the SIO would approach
 16 firearms and say, "There is not enough at present to
 17 arrest or charge these nominals", and it might be with
 18 the nature of the operation that firearms support is
 19 requested.**
 20 Q. I still haven't followed. I am sure it is me.
 21 Are you saying then: in order to justify the
 22 firearms deployment, he has to be satisfied that this
 23 cannot be done in another way, ie a simple arrest?
 24 **A. Yes, sir, because if that were the case, then we would
 25 just make grounds to arrest nominals at their addresses,**

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1 **using, like, an early morning knock-on at their
 2 addresses.**
 3 Q. I see.
 4 So the firearms commander is going to want to know
 5 that there is not enough evidence to arrest and charge,
 6 because if there is enough evidence to arrest and
 7 charge, this would be done in another way?
 8 **A. Yes, sir.**
 9 Q. Thank you.
 10 Thank you I am reminded it is 11.45, sir.
 11 THE CHAIRMAN: Thank you.
 12 MR BEER: That might be an appropriate moment. Thank you.
 13 THE CHAIRMAN: We will take break until 11.55.
 14 MR BEER: Thank you.
 15 (11.46 am)
 16 (A short adjournment)
 17 (11.58 am)
 18 MR BEER: Mr Talbot, we were looking, I think, at an email
 19 on page 423 of bundle W. You explained what the
 20 sentence "The superintendent will always ask ..." means.
 21 Can we look, please, at the reply that Ms Moore gave
 22 to you, at page 430. Can we see your email, right at
 23 the foot of the page.
 24 **A. Yes, sir.**
 25 Q. At 19.20:

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1 "Nicky, I have attached a current MG3."
 2 **A. Yes, sir.**
 3 Q. Her reply, in fact, is very short. It is the two lines
 4 that appear on the 21st, at 8.25; can you see that?
 5 **A. Yes, sir.**
 6 Q. She says:
 7 "If you are content with an email, then I am happy
 8 not to put on ICIS. In any event, we could get away
 9 with not doing it on ICIS by saying that it does not
 10 pass the TT."
 11 That is the threshold test?
 12 **A. I believe, yes, sir.**
 13 Q. So, she is telling you that, having assessed the
 14 evidence that you have summarised in your MG3, it
 15 doesn't pass the threshold for charging?
 16 **A. No, sir.**
 17 Q. How do you take that; as good news or as bad news?
 18 **A. Well, at the time it is just a response. You get the**
 19 **response, or you just get on with your work.**
 20 Q. We know, I think, by this time, 21 February, that there
 21 had been I think six firearms deployments by then.
 22 **A. Had there been six, sir?**
 23 Q. Sorry?
 24 **A. Had there been six?**
 25 Q. Yes, there had been six by then.

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1 **A. Okay.**
 2 Q. Had there been a similar reference off to the CPS
 3 beforehand, asking whether there was sufficient evidence
 4 to arrest and charge? By them?
 5 **A. I might have spoke on the telephone, she might have been**
 6 **asked as to why an MG3.**
 7 Q. Sorry, you might have spoken to her on the phone?
 8 **A. Yes, and she might have sent me an MG3.**
 9 Q. Given what you said in your email there, about the
 10 firearms silver commander will always ask, you would
 11 want to have run it past the CPS beforehand?
 12 **A. All the time you keep in contact with the CPS, keep**
 13 **updated with what's happening within the operation,**
 14 **again, seeking guidance. If there are things that do**
 15 **reach the threshold, then we would have arrested.**
 16 Q. Because, if what you said, on page 423, about the silver
 17 commander wanting confirmation that there is not
 18 sufficient evidence to arrest or charge?
 19 **A. We will probably gather that in house. If we thought**
 20 **there was enough to arrest, we would move to arrest**
 21 **phase.**
 22 Q. Right. So, what? So, you might not have run it up the
 23 flag pole with the CPS?
 24 **A. No, if there is enough to arrest people on suspicion of**
 25 **whatever criminality was going on, then we would make**

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1 **that decision ourselves.**
 2 Q. Does it follow that at this time, by submitting the MG3,
 3 you thought the position had changed by then? Because,
 4 otherwise, if you thought there wasn't sufficient to
 5 arrest or charge, you wouldn't have submitted it?
 6 **A. It is probably because it is like the pre-request that**
 7 **the superintendent will ask, "Is it sufficient to arrest**
 8 **or charge at present?" So CPS will always be, probably,**
 9 **consulted when these matters arise.**
 10 Q. What I was pointing out is we have a number of firearms
 11 deployments before this date. We haven't an equivalent
 12 exchange with the CPS.
 13 **A. The only one prior to this, within this strand of the**
 14 **operation, would be the 26 January, on the second**
 15 **reconnaissance into Stoke.**
 16 Q. Would there have been a submission of papers to the CPS
 17 then or a response back, "Yes, you have the green light,
 18 there is not enough evidence even to arrest these men."
 19 **A. I think because of the short notice when it happened,**
 20 **when the cars moved down to Stoke, they are picked up by**
 21 **the surveillance officers in Staffordshire -- obviously,**
 22 **the cars travel back to Manchester, get laid up and the**
 23 **subjects go on their way. So then that's a decision,**
 24 **because I was on a training course on 25 January, so**
 25 **there had been a decision by the SIO to go for**

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1 **a firearms team.**
 2 Q. Without checking with the CPS, first?
 3 **A. Because of the short notice, yes, sir.**
 4 Q. Did you feed this back to the SIO on this occasion,
 5 21 February?
 6 **A. Yes, sir.**
 7 Q. What was Mr Cousen's reaction?
 8 **A. Again, the operation just continues to run. We just**
 9 **carry on with the daily work within the operation, sir.**
 10 Q. I think shortly after this, you were provided with some
 11 information about the sighting of a hacksaw; is that
 12 right? In the possession of Mr Totton.
 13 **A. On 29 January, yes, sir -- sorry, 29 February. I beg**
 14 **your pardon.**
 15 Q. Yes.
 16 Can we just track this through, the hacksaw issue.
 17 **A. Yes, on the --**
 18 Q. Hold on, I will do it with the documents.
 19 **A. Okay.**
 20 Q. First, can we look, please -- we can put this one away,
 21 I think. Can we look at bundle 02, please, and
 22 page 836.
 23 **A. Thank you. Yes, sir.**
 24 Q. Are you there?
 25 **A. Yes, sir.**

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<p>1 Q. We can see, I think, that this is the first page of 2 a surveillance log, for 29 February. 3 A. Yes, sir. 4 Q. So, it is the date that we are talking about, the 5 hacksaw date. 6 Can we go then, please, to the entry at 1959, which 7 is on page 842. 8 A. Yes, sir. 9 Q. We can see it is an entry by DC Connors, one of the 10 dedicated surveillance unit officers. 11 A. Yes, sir. 12 Q. He says, "Subject Wilt," who I think is Mr Totton? 13 A. Yes, sir. 14 Q. "Wearing a black bob hat, dark top and dark bottom. 15 Along with a white male, walked from Hazelhurst towards 16 the Audi A4, registration MT11. Subject Wilt walks to 17 the boot of the car, removes something from the boot and 18 removes his bob hat. The white male, wearing dark 19 clothing, gets into the front passenger seat and Wilt 20 gets into the driver's seat. The vehicle will now be 21 referred to as subject vehicle 2." 22 Yes? 23 A. Yes, sir. 24 Q. Then, I think we should also look at a supplemental 25 entry, at page 846, at 2121, which says:</p> <p style="text-align: center;">Page 61</p>	<p>1 bundle W? 2 THE CHAIRMAN: It is the one you had before. 3 MR BEER: I think it is on your chair. That is it. 4 A. Thank you. 5 Q. Page 441. 6 A. Yes, sir. 7 Q. This is an email I think that you sent that night, at 8 10.48, to Mr Cousen. 9 A. Yes, sir. I would have gone to the DSU debrief that 10 evening, viewed the footage DC Connors had provided and 11 then updated Mr Cousen with the activity. 12 Q. So, is that what you did do or what you would have done? 13 A. What I did do, sir. 14 Q. Okay. You say: 15 "I catch a copy of a 5x5 regarding the movements of 16 Totton and Grainger." 17 You say, if you go to the 5x5, on page 442 -- 18 A. Yes, sir. 19 Q. -- I am going to miss out the stuff about the Audi 20 earlier on, and concentrate on our Audi, the MT11, the 21 one we are dealing with. You say: 22 "The Audi ..." 23 This is in the second paragraph at the bottom: 24 "The Audi then drives along the east Lincs and 25 drives to Worsley, where Totton is dropped off at his</p> <p style="text-align: center;">Page 63</p>
<p>1 "Reference entry 19.59." 2 That is the one we have just read: 3 "Wilt was also wearing black gloves. The item he 4 removed from the boot, he placed in the rear of subject 5 vehicle 2. Not communicated due to poor comms." 6 A. Yes, sir. 7 Q. So, looking at what the surveillance officer said, 8 Mr Totton was taking an object from the boot of his own 9 car, the MT11, and putting it in the rear of his own 10 car? 11 A. Yes, sir, but then there was footage with that entry, 12 sir. 13 Q. At the moment, I am just looking at what he said. 14 A. Yes, sir. 15 Q. You would agree that the surveillance officer's evidence 16 was that Mr Totton was taking something from his own 17 car -- 18 A. And putting it in the back of the car. 19 Q. -- and putting it in the back of his car? 20 A. Yes, sir. 21 Q. So from the boot to the rear of his car? 22 A. Yes, sir. 23 Q. I think, then, we can put that bundle away. Thank you. 24 Can we look, please, at the emails that we looked at, 25 which is bundle W. Bundle W, do you have that;</p> <p style="text-align: center;">Page 62</p>	<p>1 own Audi, MT11 ..." 2 A. Yes, sir. 3 Q. "-- and is observed to place a large hacksaw into the 4 boot of his car. Totton drives away." 5 A. Yes, sir. 6 Q. Now, you were not there like Mr Connors; is that right? 7 A. I wasn't deployed with surveillance, no, sir. 8 Q. But you said that you went to the DSU offices and viewed 9 some footage? 10 A. That DC Connors obtained, yes, sir. 11 Q. Was it, therefore, you that came to the conclusion that 12 it was a hacksaw being placed into the boot of the car, 13 rather than an object being taken from the boot of the 14 car and placed in the rear of the car? 15 A. From my recollection of the footage, you observe 16 Mr Totton walking from Hazelhurst towards his vehicle, 17 the MT11 Audi. He activates the alarm so the cars are 18 illuminated. As he walks round the car, you'll see 19 under the headlights the clear shape which is, seems, 20 quite a large hacksaw; opens his boot, puts that within 21 the boot and then takes out another item which he then 22 puts into the back of the car. 23 Q. Was there any evidence that the hacksaw had -- so this 24 was placing the item into his own car in Worsley, is 25 that right?</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

<p>1 A. Yes, sir.</p> <p>2 Q. Was there any evidence provided you that the hacksaw had</p> <p>3 been taken to Culcheth?</p> <p>4 A. We see Totton early in the afternoon leaving The Pines</p> <p>5 apartments when he places an object into the boot of his</p> <p>6 car within what looks like a bin bag, a bin liner. We</p> <p>7 know the red Audi had travelled to Culcheth that night</p> <p>8 and then when Mr Totton is dropped off on Hazelhurst,</p> <p>9 when he walks back to this car he has got this in his</p> <p>10 hand. Again, we don't know if he has gone to Culcheth</p> <p>11 but he returns to his car holding, carrying, the</p> <p>12 hacksaw.</p> <p>13 Q. Was there any evidence that you saw from the</p> <p>14 surveillance officers, or from the footage, that</p> <p>15 Mr Totton had been to Culcheth? If you just look at</p> <p>16 that page, the 5x5.</p> <p>17 A. Without seeing the full surveillance chronology as to</p> <p>18 who is identified, it is assumption that the nominals</p> <p>19 converge in Worsley --</p> <p>20 Q. When you say "It is an assumption that the nominals</p> <p>21 converge in Worsley" --</p> <p>22 A. Without seeing the full surveillance log to see who has</p> <p>23 been identified in the red Audi within Culcheth,</p> <p>24 I couldn't say who had been to Culcheth that night.</p> <p>25 Q. No. Shall we go back and look, then, I think that was</p> <p style="text-align: center;">Page 65</p>	<p>1 another?</p> <p>2 A. No, sir. I wasn't there.</p> <p>3 Q. Did anyone tell you that it was being transferred from</p> <p>4 one vehicle to another?</p> <p>5 A. No, sir, it is just the surveillance footage where you</p> <p>6 see Totton walk along the street carrying the hacksaw.</p> <p>7 Q. Did you hear any commentary that he had transferred it</p> <p>8 from one vehicle to another?</p> <p>9 A. No, it was only identified later through the</p> <p>10 surveillance footage, sir.</p> <p>11 Q. Can we just look at bundle K, please, at page 1246.</p> <p>12 A. Sorry, which page, sir?</p> <p>13 Q. 1246.</p> <p>14 Have you got that? Is that part of DI Cousen's</p> <p>15 casebook?</p> <p>16 A. I presume so yes, with the writing, yes, sir.</p> <p>17 Q. Can you see the entry on there which says that the</p> <p>18 subject was seen moving a hacksaw from one vehicle to</p> <p>19 another?</p> <p>20 A. 1246 did you say, sir?</p> <p>21 Q. Yes.</p> <p>22 Somebody has removed 30-pages from my book. Forgive</p> <p>23 us a moment, sir.</p> <p>24 THE CHAIRMAN: Yes.</p> <p>25 MR BEER: 1236 maybe? That is kind, thank you.</p> <p style="text-align: center;">Page 67</p>
<p>1 O2, at 836.</p> <p>2 A. Thank you. Yes, sir.</p> <p>3 Q. I think you might want to pick it up on 839.</p> <p>4 A. 19.20 on page 841:</p> <p>5 "Subject travels Common Lane, the front seat</p> <p>6 passenger is Subject Wilt."</p> <p>7 Q. At 19.20 on 841, you have got Totton in the car in</p> <p>8 Culcheth?</p> <p>9 A. The stolen Audi, yes, sir.</p> <p>10 Q. So the entry at 442 in the other bundle that we were</p> <p>11 looking at --</p> <p>12 A. Yes, sir.</p> <p>13 Q. -- although it doesn't say that, you think you would</p> <p>14 have known that?</p> <p>15 A. At the time I would have known, because we would have</p> <p>16 been listening to the commentary from the surveillance</p> <p>17 unit.</p> <p>18 Q. And would have attended the briefing when you got back?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Okay.</p> <p>21 So, in any event then, you say on 442 that the Audi</p> <p>22 arrives in Worsley, Totton is dropped off and puts</p> <p>23 a large hacksaw into the boot of his car, yes?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Did you see it being transferred from one vehicle to</p> <p style="text-align: center;">Page 66</p>	<p>1 Yes, so I am grateful to my friends who sit behind</p> <p>2 me. 1236, do you see the entry for 1 March?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Update from DC Talbot:</p> <p>5 "DT was seen moving a hacksaw from one vehicle to</p> <p>6 another (stolen to legitimate)."</p> <p>7 A. Yes, sir.</p> <p>8 Q. Did you tell him that, that he was moving from one</p> <p>9 vehicle to another, the stolen car to the legitimate</p> <p>10 car?</p> <p>11 A. Where the car stops on Hazelhurst and David Totton walks</p> <p>12 from Hazelhurst to his legitimate car, say he has walked</p> <p>13 from the stolen car to his legitimate car, he was</p> <p>14 carrying the hacksaw.</p> <p>15 Q. Did you tell Mr Cousen that he was seen moving the</p> <p>16 hacksaw from one vehicle to the other?</p> <p>17 A. He has walked from the direction of the stolen car on to</p> <p>18 Hazelhurst where, unless he has picked it up on the</p> <p>19 street there and then, he was carrying a hacksaw, sir.</p> <p>20 Q. Say that answer again, please?</p> <p>21 A. The direction he walks from, you see the stolen red Audi</p> <p>22 pass the bottom of Hazelhurst and David Totton walk on</p> <p>23 to Hazelhurst carrying a hacksaw.</p> <p>24 Q. You don't know where he has got that from?</p> <p>25 A. No, sir.</p> <p style="text-align: center;">Page 68</p>

<p>1 Q. Did you therefore tell the SIO that he was seen moving 2 it from one vehicle to another? 3 A. I must have said that at the time, sir, yes. 4 Q. That would have been wrong to say that? 5 A. If this was a physical assumption -- 6 Q. He was not seen moving it, was he? 7 A. A physical assumption, then no, sir. 8 Q. Then if we move on in the note of the SIO, please, to 9 1240 -- things are conspiring against me today, this has 10 now frozen. 11 THE CHAIRMAN: You are not alone. The national telephone 12 system for the courts is down, not just this building. 13 MR BEER: Thank you. 14 Continuing in the entry of DI Cousen's casebook, he 15 is listing a series of reasons why he sought a firearms 16 authority, and do you see the dash which says "In view 17 of all of the above..."? 18 A. Yes, sir. 19 Q. Do you see just above that? 20 A. Yes, sir. 21 Q. He says: 22 "I am concerned due to DT being seen yesterday 23 evening with a hacksaw near to financial institutions." 24 A. Yes, sir. 25 Q. Was DT seen on 29 February near to financial</p> <p style="text-align: center;">Page 69</p>	<p>1 Then can we then see, yet further building on this, 2 did you ever receive any evidence from the surveillance 3 officers or watch on video or listen to a commentary 4 that the subjects in Culcheth that night had been seen 5 emerging from a bush line near to town centre shops with 6 a hacksaw? 7 A. I don't recall, sir, no. 8 Q. So you didn't hear that? 9 A. No, sir. 10 Q. Can we look, please, at file C, page 341. If you keep 11 a finger in there and just go back to 332, so you can 12 see what document I am taking you to. 13 332, you will see this a transcript of a briefing of 14 officers given on the morning of 3 March and it begins 15 with X7, who was the firearms operational commander 16 saying: 17 "Good morning everyone. The time is now 5.57 am on 18 Saturday, 3 March 2012." 19 Yes? 20 A. Yes, sir. 21 Q. Then the names are all called out as to who is present, 22 and you can see that Rob Cousen is, I think, the third 23 or fourth name called out. 24 A. Yes, sir. 25 Q. Then if we go forwards to 338, we can see at the foot of</p> <p style="text-align: center;">Page 71</p>
<p>1 institutions with a hacksaw? 2 A. He was seen close to financial institutions within 3 Culcheth. I can't say if he was seen with a hacksaw in 4 Culcheth. 5 Q. So that is wrong, isn't it? 6 A. If that is what Mr Cousen has written, then has written 7 that. I cannot comment -- 8 Q. That is a different thing, isn't it? That is asking you 9 to decipher somebody's handwriting. I am asking you, it 10 is wrong to say that David Totton was seen the previous 11 evening with a hacksaw near financial institutions, 12 isn't it? 13 A. Well, he wasn't physically seen within Culcheth -- he 14 was just seen returning to his legitimate vehicle with 15 a hacksaw. 16 Q. He was seen in Culcheth in a car, and then in Worsley he 17 was seen with a hacksaw. 18 A. Yes, sir. 19 Q. That is the accurate thing to say. 20 A. Yes, sir. 21 Q. The inaccurate thing to say is that he was seen 22 yesterday with a hacksaw near financial institutions, 23 isn't it? 24 A. Yes, sir. 25 Q. Thank you.</p> <p style="text-align: center;">Page 70</p>	<p>1 the page X7 beginning to speak. 2 A. Yes, sir. 3 Q. Then if you just carry on until 341, you can see it is 4 still him speaking. 5 A. Yes, sir. 6 Q. Then in the middle of the page, X7 says: 7 "Okay, direct contact, if the subjects do come to 8 this location they have been seen to park up in this car 9 park here and they have been taking particular, 10 observing this area here which is a secure compound. 11 This all is Sainsbury's and that's the entrance to 12 Sainsbury's superstore here. There is a locked gate 13 there and a padlocked gate there. Here on this bush 14 line has got a metal fence behind it. They have been 15 seen driving up here and a third subject has been seen 16 emerging from this bush line here with a hacksaw and 17 getting into the vehicle and driving off." 18 Are you aware of any evidence at all that the 19 hacksaw was seen with a subject as they emerged from 20 a bush line and adjacent to the metal fence and gate at 21 the rear of Sainsbury's? 22 A. Not to my knowledge, sir. 23 Q. Is the sighting of the hacksaw on the 29th the only ever 24 sighting of the hacksaw? 25 A. The only sighting I witnessed, sir, from surveillance</p> <p style="text-align: center;">Page 72</p>

18 (Pages 69 to 72)

1 **footage.**
 2 Q. Do you know how this has happened, that what started
 3 with a surveillance officer saying "I saw Mr Totton move
 4 something from his boot to the rear of his car" has
 5 ended up with "A subject has had a hacksaw emerging from
 6 a bush line next to a padlocked gate."
 7 **A. I don't know, it's the first time I have seen this**
 8 **document, sir.**
 9 Q. Have you heard of Chinese whispers?
 10 **A. Yes, sir.**
 11 Q. Is it at least a possibility that that is what has
 12 happened here?
 13 **A. I don't know, sir. Obviously, I wasn't present at this**
 14 **briefing. Like I say, it is the first time I have seen**
 15 **this document, sir.**
 16 Q. You are not aware of any evidence to support the
 17 suggestion that a subject had been seen emerging from
 18 a bush line with a hacksaw?
 19 **A. Not to my knowledge, sir.**
 20 Q. Thank you. We can put those bundles away now and it
 21 might be time for a tidy up.
 22 THE CHAIRMAN: Yes, perhaps I could have 15 seconds or so
 23 to -- can we put all the bundles we have just been
 24 looking at away?
 25 MR BEER: Yes, although inevitably --

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1 THE CHAIRMAN: You will need them again at some point?
 2 MR BEER: Yes, but I think that is probably the best thing
 3 to do.
 4 THE CHAIRMAN: Yes, before things get to unwieldy. (Pause).
 5 MR BEER: I think the next day, 1 March 2012, you liaised
 6 with Nicky Moore of the CPS, is that right?
 7 **A. Yes, sir.**
 8 Q. I think we can see your note of that at page 64 of the
 9 bundle.
 10 **A. Yes, sir.**
 11 Q. Can we see, at page 64, you have got quite a full note
 12 of a conversation with Nicky Moore?
 13 **A. Yes, sir.**
 14 Q. At 10.45 am, and the context appears to have been the
 15 recent trips to St Helens. You say:
 16 "Speak to Nicky Moore, CPS lawyer, and discussed the
 17 recent events regarding the Audi travelling to the
 18 St Helens area on 21 February 2012 and the events of
 19 last night, where the Audi travels to Culcheth with
 20 Totton and Grainger and then returns home. Totton
 21 places the hacksaw into the boot of his Audi."
 22 Yes?
 23 **A. Yes, sir.**
 24 Q. Is this effectively the advice you are getting back from
 25 Ms Moore now?

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1 **A. Yes, sir.**
 2 Q. "Due to the fact that the areas visited -- Stoke,
 3 St Helens and Culcheth -- have been visited at times
 4 when premises are closed and nothing more than any
 5 preparatory activity has taken place, then there will be
 6 insufficient evidence to charge with any substantial
 7 offences. Subjects need to have weapons, relevant
 8 clothing (gloves, balaclavas)."
 9 **A. Yes, sir.**
 10 Q. Yes?
 11 So Ms Moore was telling you not sufficient evidence
 12 to charge --
 13 **A. Yes, sir.**
 14 Q. -- because when they had conducted visits, the subjects,
 15 to those three areas the premises were closed?
 16 **A. Yes, sir.**
 17 Q. That was a significant reason that she was giving you,
 18 wasn't it?
 19 **A. Yes, sir.**
 20 Q. Who did you tell about it?
 21 **A. The SIO, sir.**
 22 Q. So you told Mr Cousen that one of the reasons for the
 23 negative advice was --
 24 **A. Closed premises and nothing more than merely**
 25 **preparatory, sir.**

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1 Q. And you record at the end there:
 2 "Subjects needs to have weapons."
 3 Can you remember what she said?
 4 **A. The exact conversation I can't, sir.**
 5 Q. I don't expect you to, but the gist of it?
 6 **A. Again, say like weapons can be anything from weapons,**
 7 **firearms, machetes, or some might use crowbars,**
 8 **sledgehammers to commit robberies.**
 9 Q. Did you communicate that back to Mr Cousen?
 10 **A. I would have done so, yes.**
 11 Q. And presumably she was saying the subjects -- there
 12 needs to be admissible evidence that the subjects have
 13 got weapons?
 14 **A. Weapons or, again, like relevant clothing, dress.**
 15 Q. Just put the clothing aside for the moment, but there
 16 needs to be something that you could use in evidential
 17 form?
 18 **A. Other than merely preparatory, sir, I think she said**
 19 **like just driving round in a stolen car or false plates**
 20 **at the moment isn't anything more than merely**
 21 **preparatory.**
 22 Q. Was this a conversation in the context of you knowing
 23 that Mr Cousen was going to seek a firearms deployment
 24 again?
 25 **A. No, again, it is just the process of working on**

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<p>1 operation work, and it is regular contact with CPS.</p> <p>2 Obviously there had been further activity from the</p> <p>3 previous night so --</p> <p>4 Q. The hacksaw?</p> <p>5 A. Yes, sir.</p> <p>6 Q. So this was having got the negative advice back on the</p> <p>7 21st, I think, the significant thing that had changed</p> <p>8 then was the sighting re the hacksaw, which is why</p> <p>9 I spent a little bit of time working out exactly what</p> <p>10 the sighting was?</p> <p>11 A. Yes, sir.</p> <p>12 Q. So you were reverting to her and saying "Look, does this</p> <p>13 make a difference?"</p> <p>14 A. Yes, sir.</p> <p>15 Q. Then you are sentence reads -- and I appreciate this</p> <p>16 a note in a book -- it says:</p> <p>17 "Subjects need to have weapons, relevant clothing."</p> <p>18 Does that mean "and relevant clothing" or "or</p> <p>19 relevant clothing"?</p> <p>20 A. Probably "or relevant clothing".</p> <p>21 Q. So relevant clothing would be enough, would it?</p> <p>22 A. I have seen robbery offences where men dressed in</p> <p>23 balaclavas just at the stance of a box and said to a G4S</p> <p>24 custodian "Give me the box, hand the box over", and the</p> <p>25 robbery is complete and there are no weapons seen but</p> <p style="text-align: center;">Page 77</p>	<p>1 have gloves and balaclavas? Is that what you were being</p> <p>2 told?</p> <p>3 A. I think that is just generic, the sort of, if you have</p> <p>4 got gloves on, they don't want forensic evidence, and</p> <p>5 balaclavas conceal their identity.</p> <p>6 Q. Yes, and what did you communicate back to the SIO then?</p> <p>7 A. It would have been exactly that, sir.</p> <p>8 Q. Exactly what?</p> <p>9 A. It would have been passed on from Nicky Moore saying</p> <p>10 that it is nothing more than merely preparatory; until</p> <p>11 they are seen carrying weapons or wearing sort of</p> <p>12 relevant robbery clothing or criminality clothing, then</p> <p>13 there is still not enough for the threshold.</p> <p>14 Q. So the message back to the SIO would be that, if they</p> <p>15 are seen wearing relevant clothing, ie gloves and/or</p> <p>16 balaclavas, then Nicky Moore might be prepared to</p> <p>17 consider a charge?</p> <p>18 A. Potentially, sir, yes.</p> <p>19 Q. And how did Mr Cousen react?</p> <p>20 A. It is just one of them things, sir, you don't get</p> <p>21 a decision so you just move on and carry on with the</p> <p>22 operation, sir.</p> <p>23 Q. Of course it had the positive benefit that you are more</p> <p>24 likely to get the silver firearms commander on your</p> <p>25 evidence to --</p> <p style="text-align: center;">Page 79</p>
<p>1 the robbery is complete.</p> <p>2 Q. I understand that, but I am just trying to understand at</p> <p>3 the moment what Ms Moore said, whether she was saying</p> <p>4 that you really need to have some evidence of "weapons</p> <p>5 and clothing" or --</p> <p>6 A. "Or clothing", I think, sir.</p> <p>7 Q. It is "or clothing", is it?</p> <p>8 A. Yes, sir.</p> <p>9 Q. And if relevant clothing is seen, we can, what, then</p> <p>10 move to charge?</p> <p>11 A. Well, again, I was not given -- at the time to think at</p> <p>12 the time whether subjects weren't seen wearing rolled up</p> <p>13 balaclavas on their heads.</p> <p>14 Q. Sorry, say again?</p> <p>15 A. I don't think the subjects had been observed with rolled</p> <p>16 up balaclavas on their heads. If you are going to</p> <p>17 conceal your identity, you would normally do it for</p> <p>18 a reason, sir.</p> <p>19 Q. The reason being?</p> <p>20 A. You don't want to be identified.</p> <p>21 Q. Yes. Which doesn't necessarily mean a robbery, does it?</p> <p>22 A. Anything, sir, yes.</p> <p>23 Q. Any form of serious criminality, perhaps?</p> <p>24 A. Any crime, yes, sir.</p> <p>25 Q. What I am trying to understand is, would they need to</p> <p style="text-align: center;">Page 78</p>	<p>1 A. Well, not necessarily. At the time we believed it was</p> <p>2 like committing reconnaissance within the area of</p> <p>3 Culcheth, so then the job just continued -- irrelevant</p> <p>4 on my part whoever else was involved.</p> <p>5 Q. Were you on duty on the 3rd?</p> <p>6 A. Saturday, the 3rd?</p> <p>7 Q. Yes?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Did you come on early that morning? Were you briefed to</p> <p>10 come on at 5.00?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Why were you briefed to come on at 5.00?</p> <p>13 A. An instruction from the SIO, sir.</p> <p>14 Q. Did he say why he wanted you to come on at 5.00?</p> <p>15 A. I think people who did work on that particular day were</p> <p>16 warned to start at 5.00.</p> <p>17 Q. Did he say why you were going to come on at 5.00?</p> <p>18 A. No, sir, he wouldn't have to.</p> <p>19 Q. He just said turn up at 5.00?</p> <p>20 A. He just said "Can you start at 5.00 tomorrow".</p> <p>21 Q. Not that there was going to be a firearms deployment?</p> <p>22 A. No, sir.</p> <p>23 Q. You didn't know that? When did you first know there was</p> <p>24 a firearms deployment?</p> <p>25 A. Probably within the first hour of getting on duty,</p> <p style="text-align: center;">Page 80</p>

<p>1 because Mr Cousen wouldn't have been in our office, he</p> <p>2 would be over at firearms.</p> <p>3 Q. Can we look at your casebook, please, for the 3rd, which</p> <p>4 is a page on.</p> <p>5 When did you go off duty? Page 66.</p> <p>6 A. 11.30 in the evening, sir.</p> <p>7 Q. So, you were on duty for 20 hours?</p> <p>8 A. Best part of 20. 18 and a half hours, sir. 19 hours,</p> <p>9 yes, sir.</p> <p>10 Q. What did you do in that 20 hours?</p> <p>11 A. I might have helped out with some of the observation</p> <p>12 posts.</p> <p>13 Q. Sorry, say again?</p> <p>14 A. I might have helped out with some of the observation</p> <p>15 posts, the surveillance run from within our office. But</p> <p>16 others just had been tasked with keeping up to date with</p> <p>17 the operational folder.</p> <p>18 Q. What does "keeping up to date with the operational</p> <p>19 folder" mean?</p> <p>20 A. Anything from the last two nights that hadn't been</p> <p>21 updated on the database spreadsheet, like from logs from</p> <p>22 the surveillance unit, they get added to the matrix.</p> <p>23 Any actions that need writing up or had been written up,</p> <p>24 you would read through them, sir.</p> <p>25 Q. We have down there OP1, OP6 and OP7, manned I think by</p> <p style="text-align: center;">Page 81</p>	<p>1 Q. So that is DSU broadcast that you have picked up on?</p> <p>2 A. Yes, sir.</p> <p>3 Then, obviously, later, I think it is more like</p> <p>4 after 6.00 in the evening when the car starts moving, so</p> <p>5 that is like me on the last update in the books, there.</p> <p>6 Q. What did you do that day then; can you help us?</p> <p>7 A. File work for the operation, sir.</p> <p>8 Q. Sorry?</p> <p>9 A. File work with -- for the operation.</p> <p>10 Q. So, really, you were doing admin tasks?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Do you know why DI Cousen wanted you in particularly</p> <p>13 early that morning doing admin tasks?</p> <p>14 A. No, sir.</p> <p>15 Q. What were the 20 hours of admin tasks taken up with?</p> <p>16 A. I recall him, because if he has asked for staff to come</p> <p>17 on -- obviously, I'm the case officer, so he would say,</p> <p>18 "Can you come on duty?" An early start, and you come on</p> <p>19 early and work your shift, sir.</p> <p>20 Q. But the fact that you came on early and you did</p> <p>21 a 20-hour shift hasn't anything to do with the fact that</p> <p>22 this was going to be the day when the subjects were</p> <p>23 arrested?</p> <p>24 A. Well, I was not privy if it was a definite given that</p> <p>25 the subjects were to be arrested.</p> <p style="text-align: center;">Page 83</p>
<p>1 DCs Clark, Donaghy, and is that McGlone?</p> <p>2 A. McGlone, yes, sir.</p> <p>3 Q. Does that tend to suggest you weren't in the OPs?</p> <p>4 A. That would have been the initial onset, because the day</p> <p>5 ran long. At some point, I might have helped out within</p> <p>6 the observation point, sir.</p> <p>7 Q. Did you have a radio on?</p> <p>8 A. From the surveillance activity, yes, sir.</p> <p>9 Q. So you had it on from the surveillance activity?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Could you hear the firearms team on that channel?</p> <p>12 A. No, that was a separate channel, sir. We are not privy,</p> <p>13 that is a separate encrypted channel that we cannot</p> <p>14 listen to, sir.</p> <p>15 Q. Where did you go that day, if you can give us an idea of</p> <p>16 your movements that day? You see, what you have written</p> <p>17 is just:</p> <p>18 "On duty. The three OPs. Audi in situ</p> <p>19 Sandringham Road. Audi moving Culcheth."</p> <p>20 I haven't at the moment any other source of what</p> <p>21 happened in the 20 hours, so far as you're concerned;</p> <p>22 can you help us out?</p> <p>23 A. I think from the surveillance activity, the Audi in situ</p> <p>24 on Sandringham, that would have been, I think, across</p> <p>25 the air waves quite early that morning.</p> <p style="text-align: center;">Page 82</p>	<p>1 Q. Can I just take you to a couple of references on that</p> <p>2 point. I am afraid it is back in the K bundle, at 1248.</p> <p>3 1248.</p> <p>4 A. Okay, sir.</p> <p>5 Yes, sir?</p> <p>6 Q. You will have to forgive me a moment. Another thing</p> <p>7 where somebody has interfered with my file.</p> <p>8 (Pause)</p> <p>9 Thank you. Can you see this is an entry, again in</p> <p>10 DI Cousen's casebook --</p> <p>11 A. Yes, sir.</p> <p>12 Q. -- for 3 March.</p> <p>13 A. Yes, sir.</p> <p>14 Q. And he has:</p> <p>15 "Location of Audi, Sandringham Road."</p> <p>16 Then some more entries.</p> <p>17 A. Yes, sir.</p> <p>18 Q. Then, can you see, four lines from the bottom, he says:</p> <p>19 "Cells booked at Ashton."</p> <p>20 A. Yes, sir.</p> <p>21 Q. Then, over the page:</p> <p>22 "Totton, Grainger and unknown male in stolen Audi.</p> <p>23 All wearing gloves, general direction towards Culcheth."</p> <p>24 A. Yes, sir.</p> <p>25 Q. It appears on the note that the cells were booked in</p> <p style="text-align: center;">Page 84</p>

<p>1 Ashton; is that a police station?</p> <p>2 A. It would have been Ashton police station.</p> <p>3 Q. Before three males were sighted in the Audi -- on the</p> <p>4 face of the record, doesn't it?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Were you involved in booking cells in the course of the</p> <p>7 3rd?</p> <p>8 A. No, sir, again, that is the first time I have any</p> <p>9 knowledge about that action, sir.</p> <p>10 Q. Was DS Hurst in the office with you?</p> <p>11 A. On the day, yes, sir.</p> <p>12 Q. Just keep that in mind, that the cells were being booked</p> <p>13 before the subjects were seen in the vehicle together.</p> <p>14 A. Yes, sir.</p> <p>15 Q. If we can look, please, at file W. That is the email</p> <p>16 file, at 285.</p> <p>17 A. Yes, sir.</p> <p>18 Q. Can you see, this is an email, at 4.26 in the afternoon,</p> <p>19 on the 3rd, from Deborah Hurst to Robert Cousen?</p> <p>20 A. Yes, sir.</p> <p>21 Q. She says:</p> <p>22 "Boss, Mucky and Dom Greenwood from druggies</p> <p>23 deployed to OP7. Rick will do scene management with</p> <p>24 Kev. Roy can do prisoner reception. Afternoon crime</p> <p>25 scene manager is Pat Mather, who is aware. Just need</p> <p style="text-align: center;">Page 85</p>	<p>1 A. Yes, sir.</p> <p>2 Q. Was there no discussion in the office, that you heard,</p> <p>3 that there were going to be arrests that day or that</p> <p>4 night, in any event, irrespective of what the suspects</p> <p>5 did?</p> <p>6 A. No, sir.</p> <p>7 Q. Was there any sense within the team that, by 3 March,</p> <p>8 expensive and valuable resources had been deployed and</p> <p>9 that you were running out of time?</p> <p>10 A. No, sir. Some jobs run weeks, some months, some years,</p> <p>11 sir.</p> <p>12 Q. I think, by this time, the DSU had been deployed on 75</p> <p>13 occasions.</p> <p>14 A. Okay, sir.</p> <p>15 Q. For your note, sir, that is G2/699, the schedule of the</p> <p>16 deployments. That is quite a high number, isn't it?</p> <p>17 THE CHAIRMAN: How many was it?</p> <p>18 MR BEER: 75, including 3 March.</p> <p>19 A. Not necessarily, sir.</p> <p>20 Q. It was not a high number?</p> <p>21 A. Compared to some operations that we run, no, sir.</p> <p>22 Q. They are an expensive and valuable resource.</p> <p>23 A. Yes, sir.</p> <p>24 Q. You have to bid for them.</p> <p>25 A. Yes, sir. Across the force, yes, sir.</p> <p style="text-align: center;">Page 87</p>
<p>1 some prisoners now"</p> <p>2 A. I can see that, yes, sir.</p> <p>3 Q. She was in the office with you, was she?</p> <p>4 A. On the Saturday, yes, sir.</p> <p>5 Q. Can you see that this might be read as meaning that --</p> <p>6 maybe read together with DI Cousen's book, that as early</p> <p>7 as 4.00 in the afternoon, that the plan was to make</p> <p>8 arrests that night, in any event?</p> <p>9 A. Again, it is an assumption, reading between the lines,</p> <p>10 but it is something that, again, I was not involved or</p> <p>11 privy to, sir.</p> <p>12 Q. Did DS Hurst discuss anything with you; that people were</p> <p>13 going to be arrested that day in any event, come what</p> <p>14 may?</p> <p>15 A. No, sir because I think at that time nothing had</p> <p>16 happened surveillance-wise.</p> <p>17 Q. The things that she is talking about there, "scene</p> <p>18 management" and "prisoner reception", both assume that</p> <p>19 there is going to be a scene and that there are going to</p> <p>20 be prisoners, don't they?</p> <p>21 A. Yes, sir.</p> <p>22 Q. As does a crime scene manager?</p> <p>23 A. Yes, sir.</p> <p>24 Q. The last line, I suppose makes it clear:</p> <p>25 "We just need some prisoners now"</p> <p style="text-align: center;">Page 86</p>	<p>1 Q. The TFU had been deployed, I think, on seven occasions</p> <p>2 prior to 1 March.</p> <p>3 A. I was not aware it was that many, but if you are telling</p> <p>4 me, sir, yes, sir.</p> <p>5 Q. But they are a precious and valuable resource, as well?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Seven times before 1 March.</p> <p>8 Do you remember having a conversation with</p> <p>9 Nicky Moore saying that senior officers were coming</p> <p>10 under some pressure?</p> <p>11 A. Not me, personally, sir, because it would not have been</p> <p>12 relevant to myself.</p> <p>13 Q. Sorry?</p> <p>14 A. It would not have been relevant to myself.</p> <p>15 Q. What wouldn't have been relevant?</p> <p>16 A. Any cost implications. That is something for the SIO</p> <p>17 and her senior officers.</p> <p>18 Q. But we all pick up or hear chit-chat in the office,</p> <p>19 don't we?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Did you hear any, or pick up any, chit-chat in the</p> <p>22 office?</p> <p>23 A. Not at that time.</p> <p>24 Q. To that effect?</p> <p>25 A. Not at that time, sir, no.</p> <p style="text-align: center;">Page 88</p>

1 Q. If we look at 693 of the bundle, please -- you can put
 2 those away and we will just go back to your bundle.
 3 **A. Thank you.**
 4 Q. 693, please, Mr Talbot.
 5 **A. Yes, sir.**
 6 Q. This is Ms Moore's witness statement. In the third and
 7 fourth paragraph, she says:
 8 "During this operation I had numerous meetings and
 9 telephone discussions with the SIO, DI Cousen, and the
 10 case officer."
 11 You:
 12 "Initially the conversation related to the evidence
 13 in general, and I recall particularly one conversation
 14 when they called me and said they knew there was
 15 insufficient evidence to pass the threshold test, but
 16 they were under a lot of pressure from their superiors
 17 because the investigation was resource heavy."
 18 **A. That is nothing I would have discussed, sir.**
 19 Q. Were you party to a conversation in which DI Cousen said
 20 he was under a lot of pressure from his superiors,
 21 because the investigation was resource heavy?
 22 **A. No, sir, not to my knowledge. This was a live operation**
 23 **running and then the operation runs till its conclusion,**
 24 **sir.**
 25 Q. Resources don't play any part?

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1 **A. Again, that something for the management side of the**
 2 **office which, as a constable, I don't see, sir.**
 3 Q. But you hear about it, don't you?
 4 **A. If there is live operations running, sir, then not**
 5 **necessarily.**
 6 Q. You don't hear the chat in the office, "Look, we have
 7 been doing this for three months now. The Corkovics
 8 went to ground, it seemed, in the early part of it. We
 9 have flipped it and switched it to the Totton crew --"
 10 **A. Yes, sir.**
 11 Q. "-- and we haven't anything. We have put it up to the
 12 CPS twice now and it has come back with a "No", we have
 13 deployed the surveillance team 75 times, the firearms
 14 crew has gone out seven times. Upstairs, if they are
 15 upstairs, are concerned about the money that is being
 16 spent on this."
 17 Nothing like that?
 18 **A. Again, that is for management level but, on our side,**
 19 **operational level, no sir.**
 20 THE CHAIRMAN: That is not quite what you are being asked.
 21 **A. Sorry, sir.**
 22 MR BEER: I am not asking whether you made an assessment --
 23 just wait a moment --
 24 **A. Sorry, sir.**
 25 Q. -- of the expenditure of resources, and the relative

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1 benefit of continuing with the operation, against the
 2 cost --
 3 **A. Yes, sir.**
 4 Q. -- I am asking whether you heard anything in the office.
 5 **A. No, sir.**
 6 Q. You didn't hear anything, on Saturday, about booking the
 7 custody suite, or the cells, at Ashton police station?
 8 **A. No, sir.**
 9 Q. About Deborah Hurst saying, "We just need some prisoners
 10 now, we have everything else lined up."
 11 **A. No, sir.**
 12 Q. Lastly then, please, just before lunch, I think after
 13 the incident happened, as the case officer, you were
 14 responsible for building the file for the CPS to
 15 prosecute Messrs Totton, Rimmer and Travers?
 16 **A. Yes, sir.**
 17 Q. As part of that process, did you read the witness
 18 statements of the 16 armed firearms officers --
 19 **A. Yes, sir.**
 20 Q. -- the authorised firearms officers --
 21 **A. Yes, sir.**
 22 Q. -- that had been deployed?
 23 **A. Yes, sir.**
 24 Q. You noted some points in relation to them, didn't you?
 25 **A. Yes, sir.**

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1 Q. If we can turn up, please, page 760 in the file.
 2 **A. Yes, sir.**
 3 Q. Are you familiar with this document?
 4 **A. Not this document, in essence, but I can see my name on**
 5 **it, sir, yes.**
 6 Q. If we just read it, I think it is an IPCC document.
 7 **A. Okay.**
 8 Q. It says:
 9 "In line with the agreed MOU between the IPCC and
 10 the GMP robbery unit, specifically to avoid duplication,
 11 a joint request has been made seeking further detail and
 12 clarification from officers, who have previously
 13 provided statements. DC Andrew Talbot, of the Robbery
 14 Unit, has requested further information as part of the
 15 GMP robbery investigation. That request will be
 16 displayed in blue. The information requested by the
 17 IPCC investigator, Mark Bergmanski, will be detailed in
 18 red to avoid any confusion between both investigations.
 19 It is requested that each of the officers identified
 20 provides one further statement addressing both GMP, IPCC
 21 issues."
 22 **A. Yes, sir.**
 23 Q. Did you do that? Did you request further information
 24 from the AFOs as part of the robbery unit investigation?
 25 **A. Yes, sir.**

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<p>1 Q. It carries on, then: 2 "DC Andrew Talbot, I have reviewed the statements 3 which have been submitted by the firearms officers and 4 there are obvious errors in each of the statements and 5 there is also information which I believe may assist in 6 the investigation. Every statement submitted states 7 that the registration of the Audi is: LO08 LOD. 8 However, this should state RO08 LOD." 9 Then this: 10 "All the statements have been made together, with 11 the closing paragraph stating that they conferred whilst 12 making their statements to clarify vehicles, times, 13 locations and suspect details." 14 A. Yes, sir. 15 Q. A little bit further on, under the heading, "W4", who is 16 one of the officers, you say, in blue: 17 "The closing paragraph states that the statements 18 were prepared as a group. Is this common practice?" 19 A. Yes, sir. 20 Q. Presumably, it struck you as unusual that all of the 21 officers said they had conferred with each other when 22 making their statements? 23 A. Yes, sir. 24 Q. And that is why you were asking whether it is common 25 practice, because it appeared unusual.</p> <p style="text-align: center;">Page 93</p>	<p>1 MR BEER: Thank you, sir. 2 THE CHAIRMAN: All right. Thank you. 3 (12.56 pm) 4 (The Luncheon Adjournment) 5 (2.08 pm) 6 THE CHAIRMAN: Yes, Mr Straw. 7 MR STRAW: Thank you. 8 Questions from MR STRAW 9 MR STRAW: Officer Talbot, can you look at your witness 10 bundle, please. 11 A. Yes. 12 Q. In your bundle, could you turn, please, to page 663. 13 A. Yes, sir. 14 Q. That should be the first page of the 5x5x5 reports; is 15 that right? 16 A. Yes, sir. 17 Q. Could you turn over a few pages, please, and find the 18 report for 29 February 2012. 19 THE CHAIRMAN: Could I have that page reference again, 20 please? 21 MR STRAW: Sorry, sir. It is his witness bundle, turn to 22 page 663. 23 THE CHAIRMAN: Thank you. 24 MR STRAW: From 663, could you please turn forward to the 25 report for 29 February.</p> <p style="text-align: center;">Page 95</p>
<p>1 A. Yes, sir. 2 Q. Indeed, if we look on, please, to page 764 -- 3 A. Yes, sir. 4 Q. -- you say, under officer J4's statement: 5 "There is no description of the clothing worn by 6 Anthony Grainger. The statement gives reference to 7 a flip chart which was used while officers made their 8 statements, and we need to know if this is common 9 practice and if this flip chart is available for 10 disclosure purposes." 11 It was that that struck you as slightly odd as well; 12 a flip chart being used when officers, conferring with 13 each other, wrote up their statements? 14 A. It was the first time I had encountered it, yes, sir. 15 Q. That is why you are asking that question? 16 A. Yes, sir. 17 MR BEER: Thank you very much. They are the questions that 18 I ask, sir. 19 THE CHAIRMAN: Right. 20 MR BEER: It might be wise to break until 2.00 or so, or 21 2.05, to allow core participants to ask their questions. 22 THE CHAIRMAN: Yes, okay. You have completed your 23 examination, have you? 24 MR BEER: I have. 25 THE CHAIRMAN: Is 2.05 acceptable?</p> <p style="text-align: center;">Page 94</p>	<p>1 Thank you. 2 In the box, in the middle -- just to confirm: this 3 one that you wrote, is it? 4 A. Yes, sir. 5 Q. In the box, in the middle, 29 February 2012, it is said: 6 "David Totton is seen going into the Pines Apartment 7 Ainsbrook Avenue, Blackley, stays for about 45 minutes 8 and then leaves in a silver Audi A4, MT11, although 9 prior to leaving places an object in the boot of the 10 vehicle which is wrapped in a black bin bag." 11 A. Yes, sir. 12 Q. So, is it right, we have Mr Totton here, on 29 February, 13 placing a black bin bag into the boot of his silver 14 Audi? 15 A. Yes, sir. 16 Q. Thank you. 17 Do you know what happened to that bin bag? 18 A. No, sir. 19 Q. Could you have a look, please at a different bundle, 20 I am afraid. It is the K bundle, to your left, 21 page 929. 22 At 929, that should be an events log for 23 Operation Shire; do you see that? 24 A. Yes, sir. 25 Q. Do you recognise this document?</p> <p style="text-align: center;">Page 96</p>

<p>1 A. No, sir.</p> <p>2 Q. Okay. Could you turn forward, please, to page 946,</p> <p>3 please, to see the start of the entry.</p> <p>4 A. Yes, sir.</p> <p>5 Q. Bottom of the page, there should be an entry,</p> <p>6 1 March 2012, 15.19, in the afternoon.</p> <p>7 A. Yes, sir.</p> <p>8 Q. Created by Jennifer Kelly?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Could you tell us who Jennifer Kelly is?</p> <p>11 A. I believe, at the time, she worked with the dedicated</p> <p>12 surveillance unit.</p> <p>13 Q. Okay. Over the page, you will see this entry continues.</p> <p>14 A. Yes, sir.</p> <p>15 Q. At the bottom of that box, for that entry, it has,</p> <p>16 "20.02"?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Do you see that there?</p> <p>19 It says:</p> <p>20 "Black Audi, B17, observed. Subject Wilt ..."</p> <p>21 That is Totton, isn't it?</p> <p>22 A. Yes, sir.</p> <p>23 Q. "Subject Wilt alights from the passenger seat and goes</p> <p>24 to the boot of the silver Audi, MT11 ONO, removes</p> <p>25 a round bin bag and puts it into the rear seat of the</p> <p style="text-align: center;">Page 97</p>	<p>1 THE CHAIRMAN: Friday, 9 March, did you say?</p> <p>2 MR WEATHERBY: 2 March.</p> <p>3 THE CHAIRMAN: I am looking at the wrong page. My fault. I</p> <p>4 have it.</p> <p>5 MR WEATHERBY: Just a small point. That's your tour of</p> <p>6 duty, on 2 March, you are on duty for eight hours; is</p> <p>7 that right?</p> <p>8 A. Yes, sir, from midnight till 8.00 am.</p> <p>9 Q. The only note you make is collecting an officer from</p> <p>10 CCTV and then, the next line, can you help me with it?</p> <p>11 Is it, "Drop handgear ..."?</p> <p>12 A. "... handycam for DC Clark."</p> <p>13 Q. "... handycam for DC Clark."</p> <p>14 Is that related to Operation Shire?</p> <p>15 A. The tour of duty on that night would have been</p> <p>16 Operation Shire. I can't think why DC Clark would want</p> <p>17 a handycam.</p> <p>18 Q. Right, so you cannot help us with that. Okay, I will</p> <p>19 move swiftly on, then.</p> <p>20 Returning to 3 March, you have been asked about this</p> <p>21 already, which means that I can deal with it very</p> <p>22 quickly.</p> <p>23 THE CHAIRMAN: Do you need to deal with it at all,</p> <p>24 Mr Weatherby, if it has been dealt with already?</p> <p>25 MR WEATHERBY: Yes, I just want to clarify something, if</p> <p style="text-align: center;">Page 99</p>
<p>1 black Audi B17, silver Focus, part RN: FT07, arrives and</p> <p>2 parks behind the black Audi B17. White male alights the</p> <p>3 passenger side of the Focus and takes keys from Wilt</p> <p>4 [Wiltshire]. Wilt then enters apartments with bin bag</p> <p>5 and the white male drives off in silver Audi MT11.</p> <p>6 Focus and black Audi B17 then also drive off."</p> <p>7 A. Yes, sir.</p> <p>8 Q. So here, the next day, 1 March, would it be right to say</p> <p>9 we have Totton taking a bin bag from the silver Audi,</p> <p>10 putting it into the black Audi, and then taking it from</p> <p>11 the black Audi and putting it into his apartment?</p> <p>12 A. Yes, sir.</p> <p>13 Q. In any of the evidence, that you presented as officer in</p> <p>14 the case, was there any mention, at any stage, of this</p> <p>15 bin bag being seen in the red Audi?</p> <p>16 A. No, sir.</p> <p>17 MR STRAW: Thanks very much.</p> <p>18 Questions from MR WEATHERBY</p> <p>19 MR WEATHERBY: Can I just have a moment, please, sir.</p> <p>20 Just one or two matters from me, please, Mr Talbot.</p> <p>21 In your daybook, or diary, for 2 March, which</p> <p>22 I think is in your bundle, at page 65 or thereabouts.</p> <p>23 A. Yes, sir.</p> <p>24 Q. Is that Friday, 2 March?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 98</p>	<p>1 that is okay. It will not take me a moment.</p> <p>2 THE CHAIRMAN: Yes.</p> <p>3 MR WEATHERBY: I just want to make sure we have all</p> <p>4 understood this properly, particularly me. If I have</p> <p>5 not, I will apologise, but you told us that you were not</p> <p>6 aware, at any stage, of the operation moving towards</p> <p>7 arrest on that day.</p> <p>8 A. No, sir.</p> <p>9 Q. It is this really: your role in this is that you are</p> <p>10 officer in the case; yes?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Yes. So, as part of being officer in the case, your job</p> <p>13 would be to get the case ready for --</p> <p>14 A. CPS submission.</p> <p>15 Q. Yes, exactly.</p> <p>16 A. Yes, sir.</p> <p>17 Q. In terms of doing that, you would need to be involved,</p> <p>18 really, all the way through, particularly at the point</p> <p>19 of arrest and thereafter.</p> <p>20 A. Yes, sir.</p> <p>21 Q. So is it a surprise to you that, on your account, you</p> <p>22 were not made aware of the arrest? Moving to the</p> <p>23 arrest.</p> <p>24 A. If the SIO and Deputy SIO have made a decision which</p> <p>25 I cannot answer to, that is a matter for them. But</p> <p style="text-align: center;">Page 100</p>

1 **I was not aware, on 3 March, that there was any sort of,**
 2 **like, determined arrest taking place that date.**
 3 Q. Given your role, my question is: is it a surprise to
 4 you, looking at that, that you were not involved in it
 5 prior to the actual move towards arrest?
 6 **A. Well, decisions are made out of my control, so**
 7 **I wouldn't say I was surprised if that's the decision**
 8 **for the SIO and Deputy SIO, that's a decision for**
 9 **themselves.**
 10 Q. Your note on that entry, it doesn't even make reference
 11 to the shooting, does it?
 12 **A. No, sir.**
 13 Q. You were on duty till many hours after the shooting.
 14 **A. Yes, sir.**
 15 Q. Yes? Can you help us with what you were doing after the
 16 shooting; because you would have been aware of it,
 17 wouldn't you?
 18 **A. Yes, sir. We had staff on the way to Cheshire, I think,**
 19 **who got lost on the way. They turned up, the scene had**
 20 **then been closed down by Cheshire Police and the IPCC.**
 21 **Our staff weren't allowed within the crime scene, so we**
 22 **just waited till all staff came back to Nexus with**
 23 **a look at continuing the day after.**
 24 Q. So, for example, did you have a meeting with the SIO and
 25 the Deputy SIO about what was going to happen next?

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1 **A. Not that night, sir, no.**
 2 Q. Were you involved with what happened to the two men that
 3 were arrested?
 4 **A. On that night, no, sir.**
 5 Q. So nothing to report, nothing to write down, as far as
 6 you were concerned?
 7 **A. No, sir.**
 8 Q. Now, moving away from that, you have been asked some
 9 questions about your statement of the -- let me just get
 10 the right date up. It is, I think, page 4 in your
 11 bundle. It is the 2014 statement.
 12 **A. Yes, sir.**
 13 Q. Do you recall, Mr Beer suggested that that was made in
 14 respect of the Fahy prosecution, but can you think
 15 back --
 16 **A. I can't remember exactly, but I presume it was for that**
 17 **hearing, sir.**
 18 Q. Can you remember who asked you to make that statement?
 19 **A. Either the IPCC or professional standards.**
 20 Q. Right. But you are surmising that, you don't actually
 21 have a recollection?
 22 **A. I do not have a recollection, sir.**
 23 Q. No. Or the purpose of it, can you help us with the
 24 purpose of it?
 25 **A. Again, no, sir.**

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1 Q. Because, on your evidence from earlier -- again, just so
 2 that we can make sure we have this clear -- the
 3 reference to the robbery or other criminality suspected
 4 in Culcheth in 2006 --
 5 **A. Yes, sir.**
 6 Q. -- the source of that simply came from a conversation
 7 with Mr Mulverhill.
 8 **A. He was, I believe, the case officer for Operation Ascot.**
 9 Q. Yes. In terms of you making this statement, there is no
 10 other source material that you can point to?
 11 **A. Other than I saw, I witnessed the surveillance material**
 12 **around Mr Totton -- Mr Grainger, involving moving stolen**
 13 **vehicles.**
 14 Q. You witnessed?
 15 **A. I observed.**
 16 Q. You observed?
 17 **A. The surveillance footage, from that date, where nominals**
 18 **turn up and a number of stolen vehicles are moved.**
 19 Q. But beyond that, you cannot point us to a document which
 20 refers to what was or was not going on, on that date?
 21 **A. I might have had sight of some of the case papers from**
 22 **Operation Ascot, and that is probably how I formulated**
 23 **the statement, sir.**
 24 Q. The sighting of this material which you refer to, that
 25 was after the event?

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1 **A. This event, yes, sir.**
 2 Q. Again, going back to my earlier question, does that help
 3 you in terms of the purpose of this statement?
 4 **A. I am sorry, sir, it still doesn't.**
 5 Q. Now, two other quick points, really. Just to look at
 6 the intelligence coming in, you have told us that you
 7 had no access to the intelligence chronology.
 8 **A. I didn't, sir.**
 9 Q. I think you told us that the intelligence sheet on the
 10 matrix was empty; can you confirm that?
 11 **A. I don't even think there was an intelligence tab on the**
 12 **database spreadsheet.**
 13 Q. Right. Well, help me with this: you were looking
 14 through the overnight GMP log of arrests and other
 15 intelligence --
 16 **A. Yes, sir.**
 17 Q. -- and the OPUS on a daily basis?
 18 **A. Yes, sir.**
 19 Q. So if something relevant had come in --
 20 **A. Yes, sir.**
 21 Q. -- about any of the subjects, what would you do with
 22 that?
 23 **A. Make a record of it and speak to the SIO or Deputy SIO**
 24 **about what that intelligence was about.**
 25 Q. Right. So where would you make a record of it?

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<p>1 A. I would imagine in my daybook, sir.</p> <p>2 Q. In your daybook?</p> <p>3 So, so far as you were concerned, apart from this</p> <p>4 document you had no involvement with --</p> <p>5 A. Access.</p> <p>6 Q. -- there was no ongoing intelligence --</p> <p>7 A. Not to my knowledge, sir, no.</p> <p>8 Q. -- document which was accessible to all of the team?</p> <p>9 A. The only intelligence document was privy to, I think,</p> <p>10 the SIO, the Deputy SIO and the intelligence officer.</p> <p>11 There was no other intelligence matrix.</p> <p>12 Q. Yes.</p> <p>13 Now, finally, just again so we have this absolutely</p> <p>14 right, we have heard some reference to a master</p> <p>15 spreadsheet.</p> <p>16 A. Yes, sir.</p> <p>17 Q. And that was referred to as an Excel spreadsheet.</p> <p>18 A. An Excel document with tabs across the bottom which was</p> <p>19 purely for quick reference for the operation, sir.</p> <p>20 Q. Well it was referred to as a master spreadsheet by</p> <p>21 DC Mills yesterday. A document of some significance?</p> <p>22 A. No, sir, because everything else is evidenced with</p> <p>23 statements, surveillance logs. It was just a summary</p> <p>24 saved as a database spreadsheet, there was nothing --</p> <p>25 sort of like it was not a master document, it was --</p> <p style="text-align: center;">Page 105</p>	<p>1 "That is fine and I will keep you updated", is that</p> <p>2 right?</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. Was it fine?</p> <p>5 A. At the time, yes, ma'am.</p> <p>6 Q. You were also asked about the later conversation with</p> <p>7 Ms Moore on 1 March, when there was a reference to</p> <p>8 insufficient evidence yet having been obtained?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. And you were asked about whether the weapons and</p> <p>11 clothing issue was an "or" or an "and" -- "weapons and</p> <p>12 clothing" or "weapons or clothing", do you recall that?</p> <p>13 A. I believe it was a "or", ma'am.</p> <p>14 Q. Yes. Is it right that a charge was authorised and</p> <p>15 indeed the matter went to trial even though there were</p> <p>16 no weapons recovered from the vehicle?</p> <p>17 A. Yes, ma'am.</p> <p>18 Q. If we look through your daybook, will we find examples</p> <p>19 of you working different shift periods?</p> <p>20 A. All the time, ma'am, yes, with the nature of the job.</p> <p>21 Yes, ma'am.</p> <p>22 Q. We will find for example 4.00 starts and midnight starts</p> <p>23 throughout this operation?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. Anything unusual about that?</p> <p style="text-align: center;">Page 107</p>
<p>1 Q. It was not a master document. You would not describe it</p> <p>2 as a master spreadsheet?</p> <p>3 A. It was a point of reference, sir.</p> <p>4 Q. Yes. Is this what you are describing as the matrix?</p> <p>5 A. Well, the database spreadsheet, sir, yes.</p> <p>6 MR WEATHERBY: Thank you.</p> <p>7 THE CHAIRMAN: Ms Whyte?</p> <p>8 Questions from MS WHYTE</p> <p>9 MS WHYTE: Just a few things.</p> <p>10 Is there anything unusual Mr Talbot in preparing</p> <p>11 an MG3 in a case which is relatively complicated before</p> <p>12 you know exactly when an arrest is going to take place?</p> <p>13 A. No, ma'am.</p> <p>14 Q. Something you have done before on other similar cases?</p> <p>15 A. Similar operations will always have close liaison with</p> <p>16 CPS, always to see if there is enough evidence to pass</p> <p>17 the threshold where we can arrest subjects, ma'am.</p> <p>18 Q. Thank you.</p> <p>19 You were asked about your exchange with Nicky Moore</p> <p>20 from the CPS in February, 21 February, and the email</p> <p>21 exchange that you had. In your reply, which you were</p> <p>22 not taken to in any detail, in which she says nothing is</p> <p>23 going to happen because you are not going to put</p> <p>24 anything on the ICIS file, et cetera, because it was not</p> <p>25 yet passing the threshold test, you reply in effect,</p> <p style="text-align: center;">Page 106</p>	<p>1 A. With the work that we conduct, no, ma'am.</p> <p>2 Q. Do you have experience of operations into suspected</p> <p>3 organised criminals which have lasted longer than</p> <p>4 Operation Shire?</p> <p>5 A. A lot longer, ma'am.</p> <p>6 Q. And have involved more intensive surveillance of the</p> <p>7 sort that you have been asked about with officers</p> <p>8 surveilling subjects?</p> <p>9 A. A lot more, ma'am, yes.</p> <p>10 Q. And we you able to have access to similar resources</p> <p>11 after this arrest when Operation Shire 2 continued into</p> <p>12 the Corkovics for a further approximate month or so?</p> <p>13 A. Yes, ma'am.</p> <p>14 MS WHYTE: Thank you very much.</p> <p>15 Thank you, sir.</p> <p>16 MR BEER: Sir, I do not have any questions arising.</p> <p>17 THE CHAIRMAN: Thank you, Mr Beer.</p> <p>18 Thank you. That is the conclusion of your evidence,</p> <p>19 thank you for helping the Inquiry. You are free to go.</p> <p>20 A. Thank you, sir.</p> <p>21 MR BEER: Sir, that is the evidence for this week.</p> <p>22 THE CHAIRMAN: Thank you.</p> <p>23 Right, well we will adjourn at that point.</p> <p>24 Mr Weatherby, there is a matter I want to raise with</p> <p>25 you.</p> <p style="text-align: center;">Page 108</p>

1 MR WEATHERBY: Yes.
 2 THE CHAIRMAN: I have received a letter from those
 3 instructing you which has been addressed for some reason
 4 to me personally asking for a series of specific
 5 directions in relation to the evidence of Gary Mills
 6 yesterday, in the course of which he made reference to
 7 an Excel spreadsheet.
 8 MR WEATHERBY: Yes.
 9 THE CHAIRMAN: I just want to assure you that that matter is
 10 being looked into by my team. I take the view that
 11 a specific direction of the kind suggested in the letter
 12 from your instructing solicitors is clearly premature at
 13 this stage.
 14 Before the Inquiry has finished receiving evidence,
 15 it is likely that I will ask each of the agencies
 16 involved to provide a statement in the usual form
 17 confirming that nothing, no material, relevant material,
 18 remains outstanding and undisclosed, but at this stage
 19 I am confident that the matter raised by your solicitors
 20 can be resolved by a combination of the investigation of
 21 my team and by exploring any questions that arise with
 22 witnesses, as has happened today.
 23 MR WEATHERBY: Yes. Well, that is very helpful and I thank
 24 you for that.
 25 I was in fact rising to go say that I am still in

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1 discussion with your counsel about these matters.
 2 THE CHAIRMAN: I didn't mean to be rude in interrupting you
 3 but --
 4 MR WEATHERBY: Indeed.
 5 THE CHAIRMAN: Fine. Thank you very much.
 6 MR BEER: Thank you very much, sir.
 7 I think we reconvene on Tuesday of next week with
 8 DI Cousen.
 9 THE CHAIRMAN: Yes.
 10 Thank you all very much.
 11 (2.32 pm)
 12 (The Inquiry adjourned until 10.30 am on Tuesday,
 13 14 February 2017)
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