

<p>1 Monday, 10 April 2017 2 (10.10 am) 3 THE CHAIRMAN: Yes. 4 MR BEER: Thank you, sir. H9, please. 5 THE CHAIRMAN: I think that the usher has gone to fetch H9. 6 MR BEER: Thank you. 7 H9, please. 8 H9 (sworn) 9 THE CHAIRMAN: Thank you. 10 H9, I am not going to ask you to sit down. That is 11 so that we can hear you, first of all, but also so that 12 those who are entitled to can see you. 13 Does the curtain need adjusting or is it all right 14 as it is? 15 Thank you. 16 Questions from MR BEER 17 MR BEER: H9, my name is Jason Beer and I ask questions on 18 behalf of the Inquiry. To your left-hand side there 19 should be a cypher key, can you see that there? 20 A. Yes sir. 21 Q. If you wish to refer to any other officers in the course 22 of giving your evidence, please just check the cypher 23 key and use their cyphers if they are on it. 24 Secondly, in the bundle there, there should be some 25 witness statements. If you could open the bundle up at</p> <p style="text-align: center;">Page 1</p>	<p>1 Can you tell us when you joined the police service? 2 A. The police service was 2001. 3 Q. Are you still serving? 4 A. Yes, sir. 5 Q. In March 2012, what was your rank? 6 A. Police Constable. 7 Q. Does that remain the case? 8 A. That is the case, yes, sir. 9 Q. What was your role in March 2012? 10 A. I was on the operations team at the firearms department. 11 Q. You were an AFO, is that right? 12 A. That's correct. 13 Q. When did you first become an AFO? 14 A. In 2006 -- 2008. 15 Q. 2008? 16 A. 2008. 17 Q. Were you trained in the MASTS platform? 18 A. I was, yes, sir. 19 Q. Do you remember when you first became trained in that? 20 A. I believe it was 2010. 21 Q. Can you tell us what your understanding of the MASTS 22 platform is, please? 23 A. The MASTS platform was assistance to covert surveillance 24 and we were there in order to assist them in their role 25 and to provide an arrest option should it be required.</p> <p style="text-align: center;">Page 3</p>
<p>1 tab 1, please. 2 THE CHAIRMAN: You are going to be asked to refer to 3 a number of files. If you find it tricky to do so with 4 that chair in front of you, by all means move it out of 5 the way. 6 Thank you. 7 MR BEER: At tab 1 is there a witness statement in your name 8 dated 9 March 2012? 9 A. Yes, sir. 10 Q. In tab 2 is there a witness statement in your name dated 11 28 May 2012? 12 A. Yes, sir. 13 Q. At tab 3, a witness statement dated 25 August 2012? 14 A. Yes, sir. 15 Q. Then, if you skip the next tab, tab 4, which is to do 16 with special measures, in tab 5 is there a witness 17 statement dated 14 August 2014? 18 A. Yes, there is, sir. 19 Q. Then lastly is there a witness statement in your name in 20 tab 6 dated 15 September 2014? 21 A. Yes, that's correct, sir. 22 Q. Are the contents of those five witness statements true 23 to the best of your knowledge and belief? 24 A. Yes, they are, sir. 25 Q. Thank you.</p> <p style="text-align: center;">Page 2</p>	<p>1 Q. Did MASTS involve on occasions vehicle stops? 2 A. Yes, they did, sir. 3 Q. Had you trained in conducting vehicle stops? 4 A. Yes, sir. 5 Q. Did such training include conventional vehicle stops -- 6 what were known as "conventional vehicle stops"? 7 A. Yes. Yes, it did. 8 Q. If you describe what a conventional vehicle stop is, 9 please? 10 A. A conventional stop was most likely to be on the public 11 highway and consisted of either bringing that strike on 12 the nearside or the offside of the subject vehicle. 13 Q. By contrast, unconventional vehicle strikes, what were 14 they? 15 A. They could be numerous and as is probably described in 16 the word "unconventional", were anything. An example of 17 such would be placed on a car park or another location 18 that maybe wasn't the public highway. 19 Q. "Unconventional" described everything that was not the 20 nearside or offside vehicle strike on a public road? 21 A. Yes, that's correct. 22 Q. Did you practise unconventional vehicle strikes in 23 a variety of configurations? 24 A. Yes, most of the training that we would do we would 25 practise both at the same time.</p> <p style="text-align: center;">Page 4</p>

<p>1 Q. I think if you would look at tab 10 of the bundle, 2 please, and if you look at page 853 in the top right. 3 A. Yes. 4 Q. Can we see, about 10 lines from the bottom, reference in 5 your EFire record to you having undergone I think five 6 days' MASTS initial training in October 2010? 7 A. Yes. 8 Q. Between the 11th and 14th, yes? 9 A. Yes. 10 Q. Would that be about right? 11 A. That would be accurate, yes, sir. 12 Q. So about four months before this incident -- sorry, 13 a year and four months before this incident. 14 A. Yes. 15 Q. Thank you. 16 How frequently between then and March 2012 did you 17 practise unconventional strikes? 18 A. I would be guessing if I could tell you the frequency, 19 but it was dictated we would regularly, we would train 20 in those tactics. And, as I have said before, that it 21 would be likely that we would always train conventional 22 and unconventional together as a whole. 23 Q. I see. Would that practice be when you went through 24 your MASTS refresher training? 25 A. Yes.</p> <p style="text-align: center;">Page 5</p>	<p>1 there are numerous different permutations within that 2 but I would certainly say that yes there was probably 3 a preferred method or a methodology that would always 4 lend itself so a car park, some element you have got to 5 block the vehicle in. So there is only a set amount of 6 ways you could do that with your vehicles, so the 7 priority would normally be to block in the front of that 8 vehicle to stop it driving off and then subsequently the 9 rear and then covering the sides. 10 Q. It would obviously depend on whether the front and the 11 rear of the vehicle were blocked in already? 12 A. Yes, that would give your order of priority for which 13 side you would wish to provide the block on. 14 Q. In terms of when the block was completed, was there 15 a standard format in which the officers in the blocking 16 car would deploy? 17 A. We have key roles within those vehicles, the main two 18 being the drivers obviously of the vehicles themselves 19 and then the officers that were deployed with shotgun 20 and, if appropriate, CSDC canisters. 21 Outside of that the officers would approach that 22 vehicle and whatever speed they landed at they would 23 prioritise where they went within that vehicle. 24 Q. Right, so by the time that you were trained there 25 weren't any fixed positions to which people other than</p> <p style="text-align: center;">Page 7</p>
<p>1 Q. If we go over to page 855, please. Just below the first 2 hole-punch, I think we can see the next MASTS refresher 3 training you received was in March 2011. 4 A. Yes. 5 Q. Can you see that? 6 A. Yes. 7 Q. Then I don't think there is any other on that page. But 8 if you then go to 857, I think we can see two hours of 9 MASTS refresher training on 24 November? 10 A. Yes. 11 Q. It looks like between when you were initially trained 12 and this incident, there were two lots of MASTS 13 refresher training, yes? 14 A. It would appear from the record, yes, sir. 15 Q. Does that sound about right? 16 A. Off the top of my head, yes. 17 Q. One in the spring and one in the late autumn? 18 A. Yes, it could be covered within larger topic areas as 19 well for further training but as specific stand-alone 20 training, yes, that is possibly correct. 21 Q. Had you practised an unconventional strike on a car 22 parked in a car park? 23 A. Yes. 24 Q. Was there a normal way of doing that? 25 A. I think the best way to describe it, as we have said, is</p> <p style="text-align: center;">Page 6</p>	<p>1 the shotgunner or the CSDC'er would go? 2 A. No, I am aware there was specific footsteps for the 3 training previous, but I was never trained in those. We 4 were always trained in a very fluid sort of flowing on 5 to the vehicle and prioritising where you landed on that 6 vehicle based on who got there first. 7 Q. Even though that was the case, was there an anticipation 8 or an expectation that those, for example, in the alpha 9 car would go to a certain side of the vehicle? 10 A. I think depending on where your vehicle was placed, it 11 would be obvious that if you were closer to the offside, 12 for instance, then those individuals are likely to go to 13 that side, so wherever your vehicle was placed, you were 14 likely to go to the closest side or the shortest 15 distance. 16 Q. Had you in the course of the MASTS training ever 17 received training about providing cover from within 18 a vehicle? 19 A. I have experienced that on previous trainings, yes. 20 Q. On MASTS training? 21 A. Well, I was down in the Metropolitan Police it was 22 discussed. 23 Q. Was that for CTSFO? 24 A. Yes, that was on the SFO course and subsequent CTSFO 25 course.</p> <p style="text-align: center;">Page 8</p>

1 Q. You said that it was discussed. Can you expand on that,
 2 please?
 3 **A. Throughout the training I have practised in that element**
 4 **as well and the -- it was considered an option if**
 5 **appropriate.**
 6 Q. That wasn't training that I think had been provided
 7 within GMP for GMP officers; is that right?
 8 **A. My memory is fuzzy between the two as to exactly what we**
 9 **were trained in and I would suppose I would have to**
 10 **refer to the training records if they were accurate.**
 11 Q. We have heard some evidence from Q9, the man that was to
 12 happen to shoot Mr Grainger, that GMP at this time,
 13 March 2012, was the only force providing a counter
 14 terrorist capability that didn't provide static cover
 15 from vehicles.
 16 Does that accord with your recollection?
 17 **A. I am unable to be specific on that.**
 18 Q. Your memory is that the training that you received about
 19 static cover from vehicles came on the Met course?
 20 **A. Yes, I think it came on the back of their specialist**
 21 **firearms officer course, as well as the counter**
 22 **terrorism.**
 23 Q. With what frequency had you deployed on MASTS operations
 24 between the date of your qualification, which we have
 25 seen in October 2010, and March 2012?

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1 **A. It would be guesswork, but actual being deployed would**
 2 **be in the region of maybe 50 times.**
 3 Q. By "deployment" -- just so that we are speaking the same
 4 language -- I am meaning that a SFC has granted
 5 authority for AFOs to carry weapons and you have been
 6 briefed.
 7 **A. Yes.**
 8 Q. Yes. Same answer?
 9 **A. That is the same answer, sir, yes.**
 10 Q. Of those 50 or so operations, how many resulted in some
 11 direct action or positive action being taken?
 12 **A. Do you wish me to differentiate between a vehicle strike**
 13 **or whether we were subsequently deployed on to**
 14 **a building?**
 15 Q. Both, please?
 16 **A. Possible that around 20 times in total for an actual**
 17 **deployment, ie we have had a resolution to that.**
 18 **Vehicles striking themselves, probably something**
 19 **around about four or five.**
 20 Q. Had they been conventional stops?
 21 **A. A mixture, sir.**
 22 Q. Okay.
 23 THE CHAIRMAN: The 4 or 5 are out of the 20 are they, or in
 24 addition to the 20?
 25 **A. These are guesstimates, sir.**

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1 THE CHAIRMAN: I understand that, but I just want to know is
 2 it 20 resolutions altogether of which 4 or 5 were
 3 vehicles or is it 20 or so buildings and other plus 4 or
 4 5?
 5 **A. I would probably say the latter, sir, there was probably**
 6 **at least 20 deployments plus the vehicle.**
 7 THE CHAIRMAN: Thank you.
 8 MR BEER: Were you trained in the use of specialist
 9 munitions?
 10 **A. Yes, sir.**
 11 Q. Which specialist munitions, please?
 12 **A. They were the delivering of the shotgun rounds and the**
 13 **CSDC.**
 14 Q. Of the four or five vehicle strikes you had participated
 15 in, were special munitions used in the course of those?
 16 **A. Yes, sir.**
 17 Q. Which? If you can remember.
 18 **A. I believe the CSDC has been used on a previous strike**
 19 **that I have been involved in.**
 20 Q. Just one?
 21 **A. I think it was a single time, yes, sir.**
 22 Q. And the shotgun?
 23 **A. I don't believe prior to this vehicle strike that it had**
 24 **been used.**
 25 Q. Was one of the roles that you performed on previous

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1 operations that of preparing a PowerPoint briefing for
 2 the AFOs?
 3 **A. I have done that on numerous times, sir, yes.**
 4 Q. Was there any written protocol or document that governed
 5 how you were to do it?
 6 **A. Not as far as I was aware, sir. It was knowledge that**
 7 **was passed down through other AFOs.**
 8 Q. How was it in fact done? If you were told, "There is
 9 a briefing tomorrow at 7.00 in the morning, you are
 10 going to be doing the briefing, H9", what would you do?
 11 **A. It was rare that it was down to a single person, so it**
 12 **very often was a team game in relation to preparing**
 13 **that. Numerous elements of that briefing would then**
 14 **have to be in place, so recess would be conducted and**
 15 **likely that pictures would be added to the briefing to**
 16 **represent those recess, be that of premises or routes or**
 17 **items that we knew. There would be a form of words for**
 18 **intelligence that was put on.**
 19 Q. Where would the form of words for intelligence come
 20 from?
 21 **A. From the TFC, for the initial intelligence they would**
 22 **dictate how much or how little would go on there in**
 23 **terms of why we were here. So sometimes they were quite**
 24 **short, other times there was a lot more information in**
 25 **there.**

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1 Q. When you say "dictate", do you mean dictate in the true
 2 sense of the word, say it out loud and you type it up,
 3 or do you mean they would control?
 4 **A. Both, sir.**
 5 **Depending on the individual and the circumstances,**
 6 **on some occasions it would be dictate in the truest**
 7 **sense of this is exactly what I wish for you to put**
 8 **down. Other times it would be left for myself if I was**
 9 **briefing to put down a form of words that I thought**
 10 **covered it sufficiently and then that would be checked**
 11 **with the TFC to make sure that they were happy with that**
 12 **form of words.**
 13 Q. The intelligence case, as I have been describing it,
 14 that information would come from the TFC, would it?
 15 **A. Yes, the intelligence and information page.**
 16 Q. Would come from the TFC?
 17 **A. Yes, or certainly would be looked at by themselves to**
 18 **check that it was accurate.**
 19 Q. If it didn't come from them, but they checked whether it
 20 was accurate or not, where would it come from?
 21 **A. Sorry, sir, could you --**
 22 Q. Yes, you said that they would either give you the
 23 information or they wouldn't but they would check it,
 24 yes?
 25 **A. Yes.**

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1 Q. If it didn't come from them, where did it come from?
 2 **A. It would -- if I was putting that together, it would**
 3 **come from either myself or the OFC in terms of a general**
 4 **overview. It could be as simple as:**
 5 **"We believe that three individuals are looking to**
 6 **commit a robbery at Sainsbury's in Bolton."**
 7 **For example, so something as wide spanning as that.**
 8 **It would be the information that I have received as**
 9 **a result of either conversations or briefings that we**
 10 **were given.**
 11 Q. Would you as the author of the briefing attend commonly
 12 the risk assessment meeting between the sponsor
 13 department and the TFC?
 14 **A. We have done in the past. Again that would be**
 15 **a decision for people further up the chain as to whether**
 16 **they wished to take a planner with them at an early**
 17 **stage or whether they would come back and cascade that**
 18 **information.**
 19 Q. You described a planner or a person being a planner, was
 20 that sort of a recognised term?
 21 **A. Yes, I believe so, the people that would be putting the**
 22 **plan together and ultimately the briefing together.**
 23 Q. Would the planner be somebody that was necessarily
 24 an AFO that was to be deployed on the operation?
 25 **A. Yes, sir, it would be.**

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1 Q. So you would both plan and then conduct?
 2 **A. Yes, that is not a given. It didn't have to be but it**
 3 **would make sense because you are likely to be involved**
 4 **in recess of areas, so it would make sense then that you**
 5 **would be on the ground.**
 6 Q. Sometimes as a planner you would be party to the risk
 7 assessment meeting and sometimes you wouldn't, but that
 8 would be a decision for others?
 9 **A. Yes, sir.**
 10 Q. Presumably, if you were a party to the risk assessment
 11 meeting that was a good thing, it was beneficial?
 12 **A. Potentially you would have a little bit more exposure to**
 13 **all the information that was given.**
 14 Q. Who had responsibility for, if anyone, checking the
 15 accuracy of what was written on the briefing?
 16 **A. Once the briefing was complete, certainly the OFC, if**
 17 **they were to deliver it would be having a look through**
 18 **that information and checking for any inaccuracies but**
 19 **ultimately that would go to the TFC for them to have**
 20 **a look at that, as it would sit with them as their plan.**
 21 Q. Okay, so two people would commonly look at it, is that
 22 right, OFC and TFC?
 23 **A. Certainly at a level above ourselves, yes, sir.**
 24 Q. Yes. The OFC, how would they be in a position to check
 25 for accuracy?

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1 **A. I suppose in a similar way, if they have been party to**
 2 **any information that I had not they could have a look at**
 3 **that but ultimately that is, I suppose, they were just**
 4 **looking for anything obvious as opposed to going away**
 5 **and rechecking through all the different police systems,**
 6 **accuracies, true accuracies in every single word that**
 7 **was written.**
 8 Q. Would primary responsibility for checking for accuracy
 9 rest with the TFC?
 10 **A. Yes, sir.**
 11 Q. Because it was a briefing being delivered effectively in
 12 their name?
 13 **A. Yes, sir, it was their briefing that we had compiled for**
 14 **them. I would say in addition the OFC was looking for**
 15 **accuracies in the methodology of the tactics.**
 16 Q. Yes. Part of the briefings that we have seen are threat
 17 assessments in relation to the subjects, whether they be
 18 a couple of subjects, in one case right up to seven
 19 subjects.
 20 Where, when you were compiling a briefing, would you
 21 get the information to compile the threat assessment
 22 from?
 23 **A. There is a couple of sources commonly. The first one**
 24 **would be information that is passed down to myself in**
 25 **relation to an intelligence pack that would have come**

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1 from the TFC via the sponsors, if I didn't have that
 2 then I would look at the OPUS system --
 3 Q. Sorry, just stopping there, you said that the
 4 intelligence pack came from the TFC via the sponsors.
 5 Do you mean from the sponsors via the TFC?
 6 A. Sorry, sir, yes, the sponsors would obviously pass that
 7 information and then again it would be cascaded, if
 8 appropriate, down to myself. And I would use that to
 9 compile the threat assessment, the nominal pages.
 10 Q. Okay, and how many times before -- I think we are going
 11 to come on to the fact that you were the author of the
 12 briefing for the 2 March, is that right?
 13 A. Having looked at that, sir, I can't say if I was -- if
 14 I compiled the entire briefing. I know I have elements
 15 that I have done, but I can't accurately recall if
 16 I compiled that in its entirety.
 17 Q. Right.
 18 Before taking part in some way in the compilation of
 19 the briefing of 2 March, how frequently had you done it?
 20 A. Again, it would be guesswork. It was a regular
 21 occurrence to compile such briefings. There is numerous
 22 times where we would compile these briefings and then
 23 not be deployed. It would be a complete guess at that
 24 point, sir, but maybe 50 times?
 25 Q. All right, and of those 50 times or so, can you help us

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1 as to how frequently you were a party to the risk
 2 assessment meeting? Was it more often than not?
 3 A. I would say the other way round, sir --
 4 Q. Yes.
 5 A. -- it was not as often that we were party to that
 6 initial meeting.
 7 Q. How often did you receive an intelligence package from
 8 the sponsor department via the TFC?
 9 A. Again, I think it was probably 50:50 at best, a lot of
 10 the time it was reliant on looking at the OPUS system.
 11 Q. When you didn't receive a package from the sponsor
 12 department, you would go back to raw intelligence
 13 effectively on police systems?
 14 A. Yes, sir.
 15 Q. Okay, so which systems would you habitually consult?
 16 A. It would be the OPUS system.
 17 Q. You would log in as yourself on the system; is that
 18 right?
 19 A. Yes.
 20 Q. Sitting at a terminal within the firearms branch at
 21 Openshaw; is that right?
 22 A. That's correct, sir, yes.
 23 Q. You were given -- I don't know -- two names, who your
 24 subjects are, and you would search their names. Is that
 25 right?

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1 A. Yes, sir. Or specific references, the SRN number, so we
 2 knew we had got definitely the correct individual.
 3 Q. What would OPUS show you?
 4 A. That would be everything that the police knew about that
 5 individual, from crimes, arrests, intelligence,
 6 vehicles, associates.
 7 Q. How would you determine what to put on the briefing?
 8 A. You are looking at relevant to the job that they are
 9 being deployed on and they would have warning markers,
 10 commonly used warning markers. So I would look at those
 11 warning markers and then look through the system to try
 12 and find justification for those markers being in place.
 13 Q. The warning markers that you looked at, were they OPUS
 14 warning markers or PNC warning markers?
 15 A. I am unsure, sir, it was whatever markers were on the
 16 OPUS system.
 17 Q. You said you would look for justification for them, did
 18 you not presume that because they were on the police
 19 system as warning markers that an appropriate process
 20 had been gone through for inclusion of them as a warning
 21 marker and then a cyclical review to ensure that they
 22 were appropriately retained on the system?
 23 A. Yes, sir. I have to rely on the information that is
 24 there, if I can give you an example about the
 25 justification I am talking about?

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1 Q. Yes?
 2 A. For example, if you had a firearms marker on
 3 an individual, it is a wide-spanning marker so you could
 4 look at the intelligence that relates to that and we
 5 find that an individual had a BB gun or an airgun. That
 6 is obviously quite different to someone being in
 7 possession of a handgun or a shotgun, so I was just
 8 looking at the reasoning why that marker was there and
 9 checking the relevance.
 10 Q. Okay, so it is not so much whether there was
 11 a justification for the warning marker to be there, it
 12 is what the warning marker meant?
 13 A. More the gravity of it, yes, sir.
 14 Q. That would help you to decide whether or not to pass
 15 that on to the AFOs by way of inclusion on the briefing;
 16 is that right?
 17 A. Yes, the warning markers would go on, but I would --
 18 personally I would always like to put some clarity on
 19 why it was there.
 20 Q. I see, if there was a warning marker there you would
 21 always put it on, but give a short description by way of
 22 text to show what it was for?
 23 A. Yes, that's correct, sir.
 24 Q. How easy was it to establish what the warning marker was
 25 there for?

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<p>1 A. Sometimes not that easy. For any individual who holds 2 a lot of intelligence or a lot of antecedents, you are 3 trawling through a lot of information. There was no 4 direct link on the computer system to clicking on that 5 marker and it locating you to that specific bit of 6 intelligence. 7 Q. How did you do it then? How could you tell, if there 8 was an FI flag, how would you know what piece of 9 intelligence, arrest record, conviction data, that was 10 referring to? 11 A. You would have to trawl through the information and look 12 at what was obvious, so convictions, arrests, failing 13 that intelligence logs. 14 Q. When you received the packages, in cases of the 15 intelligence pack from the sponsor department, had this 16 kind of work normally been done? 17 A. Yes, sir, there was a lot more clarity in those bits of 18 information, in that the markers would be there and the 19 relevant crimes or intelligence would also be outlined 20 within that document. 21 Q. So it was much more preferable from your point of view 22 to receive an intelligence pack than not? 23 A. Yes, sir. 24 Q. To what extent in long-running operations such as 25 Operation Shire would you utilise a previous iteration,</p> <p style="text-align: center;">Page 21</p>	<p>1 A. I have a memory of conducting a recce in the Culcheth 2 area in order to look at premises that may be target of 3 these individuals. 4 Q. Was that on 1 March? Ie very shortly before the 5 deployment on 3 March that led to Mr Grainger's death? 6 A. I can't give specific dates, but it would have been 7 quite close before. 8 Q. In a witness statement that you have provided, I wonder 9 whether you could just look at it, please. It is in 10 tab 2 I believe, in your bundle. The second page. You 11 say in the last paragraph: 12 "I have been deployed on Op Shire four times 13 previously between December 2011 and March 2012." 14 Yes? 15 A. Yes, sir. 16 Q. Can you help us, does that number of four include 17 3 March? 18 A. I am unsure now, looking at that, sir. 19 Q. We know that you were present on 3 March -- 20 A. Yes. 21 Q. -- and we know that you were present on 2 March. 22 A. Yes, sir. 23 Q. That is two occasions. 24 Looking at the PowerPoint briefings that we have, 25 I have you down as being present on 15 December 2011.</p> <p style="text-align: center;">Page 23</p>
<p>1 edition, of an intelligence pack? 2 A. That was most common, sir. 3 Q. When you did that, would you presume that the previous 4 pack had gone through the briefing, had gone through the 5 appropriate checking and vetting processes? 6 A. Yes, sir, for some they don't change at all, so you are 7 running on the subsequent day. It is unlikely that 8 anything would have changed massively. With anything 9 with any great gaps, I suppose it then -- it still would 10 always go through the process of the OFC and the TFC 11 would always cast an eye over the briefing to check for 12 accuracies. 13 Q. Yes. What, before Operation Shire, was your previous 14 knowledge if any of Mr Grainger, please? 15 A. I had none, sir. 16 Q. The same question, please, in relation to Mr Rimmer, 17 Robert Rimmer? 18 A. No prior knowledge, sir. 19 Q. And the same question in relation to David Totton? 20 A. Again, no prior knowledge, sir. 21 Q. These three names, when you first came across them, 22 didn't really mean anything to you? 23 A. No, sir. 24 Q. What was your first awareness, that you can now recall, 25 of Operation Shire, please?</p> <p style="text-align: center;">Page 22</p>	<p>1 Does that ring a bell? 2 A. If it is on the records, that will be correct, sir. 3 Q. If we just look at it, please, the general firearms 4 bundle, bundle 1, at tab 10, please. 5 A. Yes. 6 Q. This is a tape recording of the briefing conducted on 7 15 December 2011 -- 8 THE CHAIRMAN: Can I just have a second? 9 MR BEER: I am so sorry, sir. 10 THE CHAIRMAN: I have number 2 here, I am just trying to 11 find -- here we are. Sorry, divider 10, yes? 12 MR BEER: Divider 10. 13 THE CHAIRMAN: Thank you, I have it. 14 MR BEER: The first page, I think we can see that you are 15 present at four lines up from the bottom. 16 A. Yes, sir. 17 Q. That is the only one that I can see on the briefings 18 before. Can you help us, where do you think you would 19 have obtained the number four from in that witness 20 statement, what would you have looked at? 21 A. I can only assume previous briefings that were either on 22 the system or from possibly one of the sergeants if they 23 have collated who was on what job. 24 Q. And they would have looked at the briefings? 25 A. Possibly they would have -- yes, that would be the</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 record, is to look back at the briefings and the</p> <p>2 postings.</p> <p>3 Q. I see.</p> <p>4 Do you have any memory of being the planner for any</p> <p>5 of the previous ones, ie not 2 and 3 March?</p> <p>6 A. No, sir.</p> <p>7 Q. To what extent, I am speaking generally here, would you</p> <p>8 take into account the intelligence that you were</p> <p>9 presented on briefing number 1 if two or three months</p> <p>10 later you would be deployed again on briefing, what</p> <p>11 might be briefing number 8 or 9?</p> <p>12 A. I think you would have an awareness if you came back to</p> <p>13 the same individuals on the same job. However, what</p> <p>14 takes precedence is the information you are given on the</p> <p>15 day.</p> <p>16 Q. Was it quite a frequent occurrence for you to be</p> <p>17 deployed several times on subjects in an operation</p> <p>18 spread over weeks or months?</p> <p>19 A. Yes, sir, it was a regular occurrence.</p> <p>20 Q. Why would the intelligence you were given on the day</p> <p>21 take precedence?</p> <p>22 A. Because that was the most up to date and the most</p> <p>23 relevant and we are deployed on that day for those</p> <p>24 reasons.</p> <p>25 Q. In the course of briefings, was it usual for you to be</p> <p style="text-align: center;">Page 25</p>	<p>1 how relevant they thought that information was.</p> <p>2 Q. Can we turn then to the days just before 3 March 2012.</p> <p>3 Do you now remember doing anything particular in</p> <p>4 relation to Operation Shire on 1 March, which was the</p> <p>5 Thursday?</p> <p>6 A. It is possible that a recce could have been conducted at</p> <p>7 that time, sir.</p> <p>8 Q. Okay. Why do you think it is possible, are you aware</p> <p>9 that other officers have given evidence or are to give</p> <p>10 evidence that you were part of a team that went out to</p> <p>11 recce Culcheth?</p> <p>12 A. Yes, I do remember recce-ing it.</p> <p>13 Q. On the 1st?</p> <p>14 A. Yes, it is just I am unsure of the date.</p> <p>15 Q. X7, who gives evidence tomorrow, has given a statement</p> <p>16 to the Inquiry in which he says that on Thursday,</p> <p>17 1 March he was on duty in the ops team office when he</p> <p>18 was contacted by the SIO for the operation, DI Cousen.</p> <p>19 And at 11.00 that morning, the Thursday, together with</p> <p>20 W4, U2 and you, he attended Culcheth town centre to</p> <p>21 familiarise himself with the area and so that you could</p> <p>22 conduct a reconnoitre of a number of financial</p> <p>23 institutions. Does that sound familiar to you?</p> <p>24 A. Yes, that sounds familiar, sir.</p> <p>25 Q. Irrespective of the date on which it took place, can you</p> <p style="text-align: center;">Page 27</p>
<p>1 given the grading of intelligence on which you were</p> <p>2 acting?</p> <p>3 A. No, that would not be a usual occurrence, sir.</p> <p>4 Q. Had it ever happened in the 50 or so operations that you</p> <p>5 can now remember?</p> <p>6 A. Not off the top of my head. It is a possibility, it</p> <p>7 would not be foreign language to ourselves but as</p> <p>8 a rule, no, it wouldn't be something that was regularly</p> <p>9 used.</p> <p>10 Q. Not foreign language because it would be National</p> <p>11 Intelligence Model language and you were familiar with</p> <p>12 the 5x5 system?</p> <p>13 A. Yes, sir.</p> <p>14 Q. To what extent were words used as a substitute or</p> <p>15 a proxy for the 5x5 system?</p> <p>16 A. I suppose you got a feeling for how strong the</p> <p>17 intelligence was based on the words that were used.</p> <p>18 Q. But did you get the sense that words were being used</p> <p>19 deliberately to convey the strength of information?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Sometimes a qualification would be applied, is that</p> <p>22 right, to the intelligence case that was being</p> <p>23 described?</p> <p>24 A. Yes, sir. There would be a definite use of words to</p> <p>25 explain either how sure they were of this information or</p> <p style="text-align: center;">Page 26</p>	<p>1 remember attending such a reconnaissance visit?</p> <p>2 A. Yes, sir.</p> <p>3 Q. He has described reconnoitring a number of financial</p> <p>4 institutions, can you remember whether the recce was in</p> <p>5 relation to financial institutions?</p> <p>6 A. Yes, it was. That was the brief we were given, to look</p> <p>7 at potential targets in the Culcheth area.</p> <p>8 Q. Do you know why the focus was on financial institutions?</p> <p>9 A. I wasn't given it specifically, sir. I made the</p> <p>10 assumption that they would be the target of a robbery.</p> <p>11 Q. Can you remember now what happened when you went out on</p> <p>12 the recce?</p> <p>13 A. I believe from memory that we split up throughout the</p> <p>14 town centre, and did exactly what was requested of us,</p> <p>15 so look at any establishment which we may believe would</p> <p>16 hold large amounts of cash or be subject to such</p> <p>17 robberies.</p> <p>18 Q. That is slightly different from a financial institution.</p> <p>19 Can you remember whether the focus was on financial</p> <p>20 institutions such as banks, building societies and Post</p> <p>21 Offices or whether it was on anything that might hold</p> <p>22 cash?</p> <p>23 A. I believe it was on the latter, sir. So to include such</p> <p>24 things as travel agents, supermarkets, the Post Office</p> <p>25 was there.</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 Q. Were photographs taken?</p> <p>2 A. I can't remember, sir, or whether -- I know there was</p> <p>3 photographs within the briefing, whether they were taken</p> <p>4 from a Google image.</p> <p>5 Q. If we just look, please, at the general bundle number 1,</p> <p>6 please, and the last tab, which is tab 18. Do you have</p> <p>7 that?</p> <p>8 A. Yes, sir.</p> <p>9 Q. This is the last briefing that was given before those of</p> <p>10 2 March and 3 March, you understand?</p> <p>11 A. Yes.</p> <p>12 Q. You will see that it was a month before, on 3 February,</p> <p>13 yes?</p> <p>14 A. Yes, sir.</p> <p>15 Q. If you just flick through, I think you will see, if you</p> <p>16 look at for example pages 591 or 607, that the briefing</p> <p>17 was all about a visit to Staffordshire.</p> <p>18 A. Yes.</p> <p>19 Q. Yes?</p> <p>20 I think we know that from the previous briefings,</p> <p>21 there weren't any photographs, plans, aerials or lists</p> <p>22 of premises in Culcheth.</p> <p>23 A. That's correct, looking at this record.</p> <p>24 Q. The last one? Okay.</p> <p>25 Then if we put that file away, please, number 1 and</p> <p style="text-align: center;">Page 29</p>	<p>1 linking on to ...</p> <p>2 Q. Right.</p> <p>3 Now the looking at the list of premises therefore,</p> <p>4 headed "Potential subject premises" at 464, we can see</p> <p>5 that they are then linked to what looks like a Google</p> <p>6 Earth or similar page at 465.</p> <p>7 A. Yes, sir.</p> <p>8 Q. Yes? The eight premises on 464 are marked up on 465;</p> <p>9 did you do that?</p> <p>10 A. It is possible, sir. I can't say with 100 per cent</p> <p>11 surety that that was exactly my work, but that would be</p> <p>12 the reason for going out on the recce, so ...</p> <p>13 Q. I mean just to help you before we proceed any further</p> <p>14 with this, if we take out your bundle, please, at tab 8,</p> <p>15 and look at pages 14 to 16, please.</p> <p>16 Can you see the foot of page 14 --</p> <p>17 A. Yes, sir.</p> <p>18 Q. -- an email of 1 March at 3.39 --</p> <p>19 A. Yes, sir.</p> <p>20 Q. -- sent by Chief Inspector Lawler, who was the TFC for</p> <p>21 this deployment, yes?</p> <p>22 A. Yes, sir.</p> <p>23 Q. To the ACC, Mr Heywood, who was the SFC for this</p> <p>24 deployment?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 31</p>
<p>1 go to the general firearms folder number 2. Go to</p> <p>2 tab 20, please and if you look, please, at page 463, can</p> <p>3 you see a slide "Foot interception"?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Do the two pages after that, 464 and 465, relate to that</p> <p>6 first slide at 463?</p> <p>7 A. I can't see any direct link between those, foot</p> <p>8 interception is obviously a tactic that could be</p> <p>9 employed and then the 464 and 465 are outlining</p> <p>10 potential addresses and then an overview of those</p> <p>11 potential addresses.</p> <p>12 Q. Similarly 466 and its relationship to 467 to 470, do the</p> <p>13 slides at 467 to 470 bear any relationship to the slide</p> <p>14 at 466?</p> <p>15 A. Yes, again a direct contact is another tactic that could</p> <p>16 be deployed, and that is generally around a building and</p> <p>17 then because it gives a single building, then they could</p> <p>18 have a link.</p> <p>19 Q. You think that the slide at 466, the header slide, does</p> <p>20 relate to the slides, the pictures, at 467 to 470, but</p> <p>21 are not so sure about the relationship between the</p> <p>22 header page at 463 to the two pages at 464 and 465?</p> <p>23 A. Yes, looking at them in isolation, sir, I am not sure.</p> <p>24 It could be that that header was used and then a verbal</p> <p>25 explanation would be given, as opposed to it necessarily</p> <p style="text-align: center;">Page 30</p>	<p>1 Q. Then you are I think a direct addressee as well, yes --</p> <p>2 A. Yes.</p> <p>3 Q. -- H9? Then it is copied to a number of other people</p> <p>4 within GMP, yes?</p> <p>5 A. Yes, sir.</p> <p>6 Q. It says "Sir", and presumably that is an address to</p> <p>7 Mr Heywood rather than to you?</p> <p>8 A. Yes, that would have been the case, sir.</p> <p>9 Q. The chairman has seen this email lots before, he sets</p> <p>10 out his threat assessment, his working strategy and his</p> <p>11 tipping points tipping points, yes?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Do you know why this was being sent directly to you as</p> <p>14 an addressee?</p> <p>15 A. If it has come directly for me I would have been</p> <p>16 transferring that information on to the briefing.</p> <p>17 Q. Okay, so does that make it likely that you were the</p> <p>18 planner for this deployment?</p> <p>19 A. I certainly would be one of the planners, sir. As</p> <p>20 I have described previously, it is highly likely that</p> <p>21 there was numerous people that would be involved, so for</p> <p>22 example I might concentrate on transcribing this</p> <p>23 information, somebody might do a set of pictures,</p> <p>24 somebody might have a look at the nominal pages and put</p> <p>25 those together and then they would send them to myself</p> <p style="text-align: center;">Page 32</p>

1 **to put in the final format and then move on.**
 2 Q. How would they send them to you?
 3 **A. They would be emailed or a folder would be created that**
 4 **we had access to and they would be placed in that.**
 5 Q. Which of those would be it be, an email or a shared
 6 folder on the drive?
 7 **A. Likely to be a shared folder on a drive. We would**
 8 **likely be sat next to each other in the same room. The**
 9 **folder would be created and then people would be able to**
 10 **either access the direct briefing and put it on, if**
 11 **somebody else had that briefing open, you were unable to**
 12 **do that so you would place it in the file next to it and**
 13 **it would be dragged across at the appropriate time.**
 14 Q. Right, so you couldn't all work on the same document at
 15 the same time?
 16 **A. No, it would give one person access and the other people**
 17 **read only access.**
 18 Q. I see.
 19 You think you were an addressee of this email
 20 because as one of the planners, Mr Lawler was providing
 21 you in a convenient format, ie it is already typed up,
 22 what his threat assessment, working strategy and tipping
 23 points were?
 24 **A. Yes, sir, that would allow me to cut and paste his work**
 25 **so it went on exactly as he had written it.**

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1 Q. Yes. If you look at the email above that on page 14,
 2 yes?
 3 **A. Yes, sir.**
 4 Q. This is an email from Mr Lawler to Nicolas Bailey, who
 5 we have heard from, he was a TFC within Cheshire Police.
 6 **A. Yes, sir.**
 7 Q. Yes?
 8 In fact it is copied to you the email at 4.26 in the
 9 afternoon, yes?
 10 **A. Yes, sir.**
 11 Q. He has addressed it to both of you, "Nick" to start
 12 with, and do you see in the passage underneath "Nick" it
 13 says:
 14 "... for your information and that of your deputy
 15 chief constable only, please, if required I will ensure
 16 any unarmed officers in Cheshire are not at risk during
 17 this operation. I will also arrange for our full brief
 18 to be forwarded to you."
 19 Would you understand that as a reference to the
 20 PowerPoint that you were a party to the construction of?
 21 **A. Yes, sir. So when that is fully complete I would send**
 22 **to him and it looks like he has asked me to send it to**
 23 **the other individual.**
 24 Q. Exactly, he has then in the second part of his email
 25 said "H9", ie I think that was your first name there?

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1 **A. Yes, sir.**
 2 Q. "... once brief done, to Nick at above, please."
 3 What he is saying there is once the briefing has
 4 been constructed, please send it to Chief Inspector
 5 Bailey at the above address?
 6 **A. That would be my understanding, sir, yes.**
 7 Q. Given that the first email was sent directly to you and
 8 in the light of this instruction here directly to you,
 9 does that suggest to you now looking back that you were
 10 primarily responsible for the writing of the briefing
 11 paper?
 12 **A. I would have overall control of that briefing, sir.**
 13 Q. Thank you. If we can put that to one side and go back
 14 to the briefing then.
 15 I think we still had open tab 20, at page 464, so
 16 the slides at 463 to 465, looking at them now do you
 17 understand these not to be premises at which a foot
 18 interception may be possible?
 19 **A. They potentially could be, sir, on the way to but once**
 20 **within any of those premises it would be a different**
 21 **tactic potentially employed.**
 22 Q. What I am trying to get at rather clumsily is what these
 23 three pages mean. Is this slide a description of, and
 24 only a description of, to officers eight premises where
 25 a foot interception may occur or is the purpose broader

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1 than that? Namely these are generally speaking the
 2 potential subject premises for this operation?
 3 **A. I think the latter, sir. To give officers an awareness**
 4 **about where they sat within Culcheth should we**
 5 **subsequently find out that they were going to be the**
 6 **intended targets. So then it wouldn't be completely**
 7 **brand new information to themselves.**
 8 Q. Yes.
 9 Do you have any water there incidentally?
 10 **A. No, sir. (Pause)**
 11 **Thank you.**
 12 Q. This list at 464, do you believe that that was compiled
 13 as a result of the recce?
 14 **A. I do, sir, yes.**
 15 Q. Who was in charge, in inverted commas, of coming up with
 16 that list?
 17 **A. Ultimately, that would have been X7.**
 18 Q. The OFC?
 19 **A. The OFC, but it would have been the responsibility of**
 20 **all the individuals who went on the recce to find those**
 21 **bits of information and come back and compile them**
 22 **together.**
 23 Q. Can you now recall on what basis they were selected?
 24 **A. Purely as potential locations that would either hold**
 25 **cash or potentially have cash deliveries.**

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<p>1 Q. Do you know whether any enquiries were made as to 2 whether they would be open or not, or when they would be 3 open? 4 A. I can't remember off the top of my head, sir. If you 5 asked me to do it now then I would definitely look at 6 potential opening times. 7 Q. Can you remember whether the focus on the first part of 8 the operation, 2 March, was on potential robberies of 9 the premises rather than deliveries to them? 10 A. I can't remember now, sir. 11 Q. Can you remember whether the possibility of a cash in 12 transit robbery was a realistic possibility or viable 13 option -- 14 A. Yes, I believe -- 15 Q. -- that was being considered on 2 March? 16 A. I do believe that was considered. 17 Q. If you move on a tab, please, to tab 21, yes? 18 A. Yes, sir. 19 Q. Forgive me a moment, I just need to find a page. If you 20 look at page 1176, please, do you have that? 21 A. Yes, sir. 22 Q. This is a recording of the briefing that was 23 subsequently to take place. In the larger box, in the 24 first paragraph in the larger box, I think this is Chief 25 Inspector Lawler speaking about six lines in, he says:</p> <p style="text-align: center;">Page 37</p>	<p>1 "What I do know is this part here is a loading bay 2 for Sainsbury's, and when they have conducted recess in 3 the past we know that they have emerged, one of the 4 subjects emerged from this bush line here with 5 a hacksaw. So whether they have been effecting an entry 6 through the fence there or prepping to see if they can 7 do or gain access through there, we don't know but we do 8 know when a subject has come from there." 9 Can you remember now whether the specific concern 10 was, for the operation on 2 March, subjects breaking 11 into premises, perhaps using the hacksaw that they had 12 been seen in possession of, and laying in wait for 13 staff? 14 A. I can't remember 100 per cent, sir. My overall memory 15 was that there was still a lot of unknowns in relation 16 to which premises was going to be targeted or in fact if 17 it was going to be a cash in transit drop. 18 Q. You were present at this briefing given by Chief 19 Inspector Lawler and X7 at about 1.00 am on the Friday, 20 yes? 21 A. Yes, sir. 22 Q. I think we can see you at page 1175 as being mentioned, 23 yes? 24 A. Yes. 25 Q. Six or so up from the bottom?</p> <p style="text-align: center;">Page 39</p>
<p>1 "Now, there is intelligence to suggest that these 2 subject were responsible for a robbery in 2008 in 3 Kirkham in Preston where they broke into a bank and lay 4 in wait for staff to arrive. Again a point in that, 5 they broke in around just after 3.00 in the morning, 6 which is why we are here at this time today." 7 Can you see that? 8 A. Yes, sir. 9 Q. Can you remember whether the focus of the operation on 10 this occasion was the possibility of the suspects 11 breaking into the premises, staying there and waiting 12 for staff to arrive? 13 A. I think it was a possibility. I can't remember with 14 absolute clarity, although looking at the plan there 15 seems to be some -- I know that the Sainsbury's was 16 looked at in more detail later on. 17 Q. Can you remember any particular focus on an area where 18 the subjects had been seen recce-ing the premises? 19 A. I believe there was some talk of someone with either 20 a hacksaw or seen near a bush near the back, because 21 I know we looked at the back of the Sainsbury's area. 22 Q. Can you turn to page 1183, please. 23 A. Yes, sir. 24 Q. I think this is X7 speaking now. Eight lines in he 25 says:</p> <p style="text-align: center;">Page 38</p>	<p>1 A. That's correct, yes, sir. 2 Q. Can you look, please, at page 1181. 3 A. Yes. 4 Q. I think this is X7 speaking at the end of the first 5 large paragraph -- sorry, my mistake, 1180, please, at 6 the beginning of the second paragraph. 7 A. Yes, sir. 8 Q. X7 says: 9 "While we are on the subjects, our intention is to 10 conduct an interception prior to any offence taking 11 place, which is before we get to Culcheth." 12 Yes? 13 A. Yes, sir. 14 Q. Then over the page to the passage I was highlighting 15 earlier at the end of the first big paragraph: 16 "It may be appropriate that they are getting on to 17 the plot, so if that is the case we cannot get close to 18 them, we will let them deploy." 19 Yes? 20 A. Yes, sir. 21 Q. "As it stands there is no threat to any individuals as 22 far as we are aware, so it may well be the safest option 23 is to let them deploy on foot and we will conduct any 24 strike there." 25 Yes?</p> <p style="text-align: center;">Page 40</p>

1 **A. Yes, sir.**
 2 Q. Can you remember whether the plan was to prevent these
 3 subjects from ever getting to Culcheth?
 4 **A. I can't remember if that was the case, sir.**
 5 Q. Can you remember now any specific difference between the
 6 plan as between 2 March and 3 March?
 7 **A. I don't remember any specific differences.**
 8 Q. We know that these words, both phrases, were not
 9 repeated by X7 or anyone else the following day. About
 10 stopping the subjects from getting to Culcheth at all,
 11 ie presumably a vehicle strike on the way there, or the
 12 safest option is to let them deploy on foot, or may well
 13 be to let them deploy on foot.
 14 Did that strike you at the time, that we had been
 15 told one thing on one day but were not told it the next,
 16 that you can now recall?
 17 **A. Not particularly, sir. That sort of information happens**
 18 **all the time. We are constantly asked to change,**
 19 **information can change so again the most relevant**
 20 **information to us would be the one in which we are**
 21 **briefed and deployed on that day with.**
 22 Q. On the second thing I have drawn your attention to
 23 there, 1181, assuming that what X7 means here is that if
 24 contrary to our plans we cannot intercept the subjects
 25 on the way to Culcheth and they arrive on the plot, the

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1 safest option is to let them deploy on foot and then we
 2 conduct the strike.
 3 Do you understand what he means by that?
 4 **A. I am assuming, looking at that now, that he is sort of**
 5 **saying, due to how quiet Culcheth was, that we would --**
 6 **it would be highly unlikely for us to get three or four**
 7 **cars behind the subject vehicle covertly enough in order**
 8 **to effect a stop. So we may have to let them park, get**
 9 **out of the vehicle, so we negate that as an escape route**
 10 **and then perform the strike on foot.**
 11 Q. Why would the safest option be to let them get out of
 12 the car?
 13 **A. I believe that is his personal view. Looking at it as**
 14 **an overview now he may be looking at the fact that once**
 15 **they are out of the car you then remove that as**
 16 **a potential weapon or means of escape.**
 17 Q. You said that you believed that is his -- looking at it
 18 now, his personal view. Did I detect from that that it
 19 is not yours?
 20 **A. Either way, sir, I was not in charge of that, I would**
 21 **have to look at that in its entirety again and have full**
 22 **knowledge of all the information. I think an argument**
 23 **could be made for both ways, sir.**
 24 Q. What is the argument in favour of it being the safest
 25 option to let them get out of the vehicle and deploy on

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1 foot?
 2 **A. That would be safe in relation to you removing the**
 3 **vehicle from the situation. So you have now not got**
 4 **a vehicle that potentially could make off, could be used**
 5 **as a weapon. So that is where the safety element**
 6 **I would imagine would come from that argument.**
 7 Q. Any other advantages, looking at it broadly, that you
 8 can see in allowing subjects to get out of a vehicle
 9 before striking upon them?
 10 **A. The only other thing is that element of covertness, is**
 11 **that we could remain covert until they have placed**
 12 **themselves in the position they want to be. There could**
 13 **be an argument that it may give you an indication as to**
 14 **which premises they were looking at, if they had located**
 15 **their vehicle close to that premises.**
 16 Q. What about this. If you conduct a strike on a vehicle,
 17 it is quite difficult to see what the people within it
 18 are doing?
 19 **A. Potentially, yes, sir, you are within a vehicle.**
 20 Q. You are in a vehicle and they are in a vehicle?
 21 **A. Yes, sir.**
 22 Q. Is it right that one of your main concerns as an AFO,
 23 when you are striking on people who are potentially
 24 armed and dangerous, is what they are doing with their
 25 hands?

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1 **A. Yes, sir. That is where I would be looking to get**
 2 **an early indication of their actions.**
 3 Q. Because it is their hands that can hold weapons?
 4 **A. Yes, sir.**
 5 Q. And your sight from a vehicle into a vehicle is
 6 compromised to some extent, if you are trying to
 7 ascertain what the subjects are doing with their hands?
 8 **A. Naturally, due to the furniture of the vehicles, yes,**
 9 **sir.**
 10 Q. Yes.
 11 Whereas if they are out of the vehicle, you are more
 12 likely, speaking in general terms, to have a better
 13 sight of what they are doing with their hands?
 14 **A. Yes, sir.**
 15 Q. What about the other way round, the disadvantages of
 16 letting them get out of a vehicle before striking?
 17 **A. The obvious ones that spring to mind is the timing that**
 18 **is involved in that, sir. So once those individuals are**
 19 **out of the vehicle, you have to then get to the same**
 20 **position as them and you are always on the back foot.**
 21 **Other disadvantages are you have now got, in this**
 22 **occasion, three people that could run in three different**
 23 **directions, so you are splitting resources straight**
 24 **away.**
 25 **And the other main disadvantage, I would suppose, is**

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1 **how far they can then encroach into public space or**
 2 **continue on to their target before you could get to**
 3 **them, so containing three running individuals is a lot**
 4 **more difficult than containing one car.**
 5 Q. Is that kind of balance between the factors that you
 6 have just outlined there, something that you would
 7 expect to be the subject of consideration and
 8 potentially discussion between the OFC and the TFC?
 9 **A. Yes, I would expect this to be discussed with the TAC**
 10 **adviser as well when they are given all the potential**
 11 **options.**
 12 Q. You wouldn't be a party to that discussion, you would
 13 just be asked to enact what the outcome of the
 14 discussion was?
 15 **A. Yes, sir, they would give us the proposed tactics and we**
 16 **would have contingencies within that to deal with**
 17 **something that fell outside of what we expected.**
 18 Q. Going back, please, to tab 20 in the general firearms
 19 folder number 2, can we look at page 449, please?
 20 **A. Yes, sir.**
 21 Q. Can we see the information and intelligence case, yes?
 22 **A. Yes.**
 23 Q. This was a common slide in any firearms presentation; is
 24 that right?
 25 **A. Yes, that's correct.**

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1 Q. You have told us that it may contain less or more
 2 information than is set out here?
 3 **A. Yes, sir.**
 4 Q. Do you believe that you were responsible for writing
 5 this?
 6 **A. It is possible but not a definite. Again, someone could**
 7 **have compiled this and put it in the folder.**
 8 Q. Can you help us now where this information was obtained
 9 from?
 10 **A. This will have had to be -- can I just have a quick**
 11 **second to read over it, please, sir.**
 12 Q. Of course.
 13 Ignore the handwriting on it, which is Mr Lawler's
 14 own notes to himself as to additional things to say.
 15 (Pause)
 16 **A. This potentially could have come from numerous sources.**
 17 **Certainly, "Intelligence to suggest these subjects were**
 18 **responsible for ..." Could either come by the way**
 19 **of an intelligence pack or via intelligence held on the**
 20 **OPUS system. The more current information, ie the**
 21 **access to the stolen Audi A6 estate and where it was**
 22 **parked and the conducted recess would have had to come**
 23 **from either surveillance or through the TFC or sponsor.**
 24 Q. I am not going to ask you to turn it up, but if we went
 25 back to the equivalent slide of the 3 February briefing,

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1 do you remember we looked at that at the back end of the
 2 first volume. The only line which is the same is the
 3 first, namely:
 4 "The subjects of this operation are believed to be
 5 engaged in armed robberies in the north-west region ..."
 6 Which was word for word the same, other than the
 7 word "subjects" in the previous version was a capital
 8 "S", whereas on this one it is a lower case "s".
 9 **A. Yes, sir.**
 10 Q. But everything else is different, so does that -- tell
 11 us how you do these things. If you came to this
 12 briefing would you bring up the last one, ie the
 13 3 February one, cut out that which you didn't want and
 14 then type in the new stuff that you did?
 15 **A. Yes, sir. Again, this would be not guessing but making**
 16 **an educated guess on -- if it read exactly the same at**
 17 **the start, it would suggest that would be used initially**
 18 **and that extra information would have probably been**
 19 **passed as opposed to researched.**
 20 Q. Right, so what would you do, you would sort of right
 21 click "Copy", "Create new document" create a new one for
 22 2 March and then think, "The first line is still right,
 23 I will use that", and then cut the rest of it out
 24 because it was all about cash in transit robberies in
 25 Staffordshire and then access other sources of

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1 information to populate the rest of the slide?
 2 **A. Yes, that's correct and that process would continue**
 3 **through the briefing for deployment changes.**
 4 Q. You can't now recall whether you were responsible for
 5 this second, third and fourth paragraphs and therefore
 6 where in fact it came from?
 7 **A. No, sir.**
 8 Q. Can we move on, in the slides, please, to the threat
 9 assessment for Mr Totton at page 450.
 10 **A. Yes, sir.**
 11 Q. If you just forgive me a moment. Do you believe that
 12 you were responsible for creating the threat assessments
 13 for Mr Totton, Mr Rimmer and Mr Grainger?
 14 **A. Again, I -- not with 100 per cent certainty, sir. It**
 15 **follows the same process that I could have placed these**
 16 **or other individuals could have done them on my behalf.**
 17 Q. The slide is the same, maybe we will turn it up, just to
 18 look at it. It is volume 1 of the firearms bundles, at
 19 tab 18, page 571.
 20 **A. Yes, sir.**
 21 Q. If you just put them alongside each other, I think you
 22 can see that the identity looks like it has been cut and
 23 paste, doesn't it?
 24 **A. Yes, if this individual had not changed throughout, that**
 25 **would be a likely process, that that page would have**

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1 **been copied across to the latest briefing.**
 2 Q. In fact it has not stayed the same completely, because
 3 if you look in the February edition, under "Weapons",
 4 the officers were told, "Has also used a machete in the
 5 commission of another offence", but that has been cut
 6 out.
 7 **A. Yes, I can see that, sir.**
 8 Q. Do you know why that would be?
 9 **A. No.**
 10 Q. If you go on to Mr Rimmer, he is on page 575 of tab 18.
 11 **A. Yes.**
 12 Q. Can you see that the capability is the same, except it
 13 has been formulated slightly differently?
 14 **A. Yes, sir.**
 15 Q. The content and the information is the same, yes?
 16 **A. Yes, sir.**
 17 Q. Then Mr Grainger, if you go on to him, it is the same?
 18 **A. Yes, sir.**
 19 Q. How would, if you were doing this, you go about it, you
 20 would look at the month old one, copy it into the new
 21 briefing?
 22 **A. Yes, sir.**
 23 Q. And then do what, if anything?
 24 **A. If it was the same individual, with the same threat**
 25 **assessment and no new intelligence had been passed to**

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1 **myself, then if it was me personally, I would take those**
 2 **individuals and copy it into, check for any sort of**
 3 **spelling mistakes or just tidying it up in general, but**
 4 **I wouldn't necessarily go back and do all that research**
 5 **again.**
 6 Q. Okay, so you wouldn't for example check on Mr Grainger,
 7 that we are on, that where it says, "He previously
 8 conspired to commit robberies with firearms". You
 9 wouldn't check to see whether that was accurate or not?
 10 **A. Not necessarily, I would rely on that my colleagues all**
 11 **follow the same process that I would do and that it**
 12 **would be accurate.**
 13 Q. Do you think your colleagues would do the same?
 14 **A. Yes, sir.**
 15 Q. They wouldn't reinvent the wheel and go back and look
 16 again?
 17 **A. Having worked as a team on numerous briefings, that**
 18 **would be the method that most people would use.**
 19 Q. In that there is a presumption of propriety and accuracy
 20 by your predecessors?
 21 **A. Yes, sir.**
 22 MR BEER: Sir, I am about to turn to 3 March, that might be
 23 a convenient moment.
 24 THE CHAIRMAN: It is a convenient point to take a break
 25 I think.

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1 Yes. We will take a five-minute break at this
 2 stage, thank you.
 3 MR BEER: Thank you, sir.
 4 THE CHAIRMAN: We will just wait for the usher and come and
 5 fetch you. Five minutes from now.
 6 MR BEER: Thank you, sir.
 7 (11.29 am)
 8 (A short adjournment)
 9 (11.37 am)
 10 THE CHAIRMAN: Yes, Mr Beer.
 11 MR BEER: Thank you, sir.
 12 H9, just a couple of questions before I move on to
 13 3 March.
 14 The Inquiry asked Greater Manchester Police to
 15 conduct an audit of the extent to which OPUS was
 16 accessed by any officers between 1 and 3 March,
 17 inclusive.
 18 That audit showed that for Anthony Grainger, OPUS
 19 was accessed only after the shooting by a high number of
 20 officers.
 21 For Robert Rimmer, it wasn't checked at all.
 22 For David Totton it was checked by a high number of
 23 officers after the incident. Before the incident, it
 24 was checked by an officer within the surveillance unit
 25 on 1 March, by an officer known as C4 on 1 March and by

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1 DC Andrew Talbot, who was the officer in the case in
 2 Operation Shire, on 3 March, on the Saturday.
 3 That audit would tend to suggest that it wasn't
 4 checked at all on 1 or 2 March, by anyone within the
 5 firearms teams. Including by yourself. Does that
 6 confirm what you said earlier, that you would have, if
 7 it was you dealing with the threat assessments, have
 8 simply cut and pasted what was in the previous briefing?
 9 **A. Yes, sir.**
 10 Q. Across to this briefing?
 11 **A. Yes, sir.**
 12 Q. In relation to the information and intelligence page,
 13 you will recall that there was information about
 14 an alleged robbery in 2008. Do you remember?
 15 **A. Yes, sir.**
 16 Q. It would appear that that wasn't included on the basis
 17 of OPUS checks, for the reason I have just given,
 18 certainly as a result of research conducted on 1 or
 19 2 March.
 20 Have you any idea where that came from?
 21 **A. No, I don't, sir. I could make presumptions about where**
 22 **it could have come from but I don't 100 per cent know**
 23 **where that information has come from.**
 24 Q. Thank you.
 25 Can we turn then to 3 March. Before I do turn to

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1 3 March, I think you made an account of what happened on
 2 3 March in a witness statement of 9 March. Is that
 3 right?
 4 **A. I believe so, sir.**
 5 Q. That was your first written account of events of
 6 3 March?
 7 **A. Yes.**
 8 Q. Can you help us, that was six days after the incident.
 9 I suspect this was the first fatal shooting that you had
 10 been involved in?
 11 **A. Yes, sir.**
 12 Q. What, in broad terms, accounted for the delay in making
 13 your first account?
 14 **A. That was when we were told to do it.**
 15 Q. Before then, had you been told not to do it?
 16 **A. I was -- we were waiting until they asked to us give the**
 17 **accounts. I can't remember exactly who said this or**
 18 **when they said this. As you say, this is the first of**
 19 **anything of that sort I had been involved in so I was**
 20 **just doing exactly as I was told in respect to giving**
 21 **statements.**
 22 Q. Who are the "they" likely to be in those sentences?
 23 **A. Anyone involved in the post-incident management, and**
 24 **that included, as I am sure you are aware, numerous**
 25 **sergeants, the PIM manager, the federation legal**

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1 **representatives.**
 2 Q. Certainly those groups were involved on the night and
 3 into the early morning of Sunday, the 4th. We have seen
 4 already guidance in the manual of guidance that suggests
 5 that an account of the type that you provided on 9 March
 6 shouldn't be taken within the first 48 hours.
 7 **A. Yes, sir.**
 8 Q. But who was deciding whether or not you should make
 9 an account after that time, up until the Friday when you
 10 did make the account?
 11 **A. I think we would have been guided by my sergeant and the**
 12 **inspector that would -- that he is managing the**
 13 **situation and requesting when we make this statement.**
 14 Q. Were you keen to make an account of what had happened?
 15 **A. Yes, sir, definitely.**
 16 Q. Did you receive any advice personally from a lawyer?
 17 **A. No, not personally, sir, no.**
 18 Q. Did you attend a meeting of the Police Firearms
 19 Officers' Association on 8 March?
 20 **A. I believe I did, sir, yes.**
 21 Q. What happened at that meeting?
 22 **A. We had an officer come from the Metropolitan Police, as**
 23 **well as a PFOA representative and they, as far as my**
 24 **recollection goes, they were checking on the welfare of**
 25 **the officers, and seeing if there is anything that could**

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1 **assist us.**
 2 Q. You said that you think you did attend such a meeting.
 3 If you just look at tab 9 in your folder, please.
 4 **A. Yes.**
 5 Q. I think that is your pocket notebook, isn't it?
 6 **A. Yes, sir.**
 7 Q. If you look for 8 March, to the lower half of the page.
 8 **A. Yes.**
 9 Q. It says, "Tour of duty, 10.00 till 6.00". Yes?
 10 **A. Yes.**
 11 Q. I think you were on duty for eight hours; is that right?
 12 **A. Yes, sir.**
 13 Q. What you have down is "MASTS refresher training", yes?
 14 **A. Yes, sir.**
 15 Q. Then if you look at tab 10, please.
 16 **A. Yes.**
 17 Q. On 8 March -- sorry, at page 857.
 18 **A. Yes.**
 19 Q. The last entry, 8 March, you were also doing some MASTS
 20 refresher training, yes?
 21 **A. Yes.**
 22 Q. Which I think is seven hours, isn't it?
 23 **A. Yes, sir.**
 24 Q. 420 minutes?
 25 **A. Yes, sir.**

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1 Q. The column with the numbers in is the number of minutes
 2 and 420 minutes is, I think, seven hours.
 3 Was the visit from the PFOA in the course of the
 4 MASTS refresher training?
 5 **A. It must have been, sir, if I was in both.**
 6 Q. Tell us what you remember, then, about the PFOA visit?
 7 **A. Not much, sir. I remember being at our unit and these**
 8 **individuals being there and just a general sort of**
 9 **welfare and seeing if they could offer any of the**
 10 **officers any additional support.**
 11 Q. Were you all together in a room?
 12 **A. I remember us sat round the table in our main office.**
 13 Q. How many officers came from the Met?
 14 **A. Either two or three, from memory.**
 15 Q. Do you remember one of them being the man that had shot
 16 Mark Duggan?
 17 **A. Yes, sir.**
 18 Q. What did he say?
 19 **A. I can't remember exactly what he said. Again I have**
 20 **just got an overriding sort of knowledge that they were**
 21 **just there to check the process or check the welfare of**
 22 **the officers and sort of sell the benefits of the PFOA.**
 23 Q. Was there any discussion about the process, namely that
 24 other than three people who had made short initial
 25 accounts on the night, nobody had made a witness

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1 statement yet?
 2 **A. I am unsure if we had a discussion with them, I am aware**
 3 **that it was a general concern between a few of us that**
 4 **we wanted to get on and put this information down in**
 5 **statement form.**
 6 Q. Did you attend Nexus House the next day?
 7 **A. Yes.**
 8 Q. 9 March?
 9 **A. Yes, according to the records, yes, 9 March.**
 10 Q. We have heard evidence that there was a flip chart on
 11 display in the room, do you remember that now?
 12 **A. Yes, I remember that, sir.**
 13 Q. Was the flip chart written up on the basis of
 14 contributions that the room made to it or was it
 15 populated by information from another source?
 16 **A. I am unsure, sir. I don't remember discussions around**
 17 **what was going on it so I assume that it was written**
 18 **from logs or data that had already been recorded.**
 19 Q. Did you use some of it to write your statement?
 20 **A. I believe I did, sir.**
 21 Q. If we just look at your statement in tab 1 of your
 22 bundle. On your left-hand side on the chairman's bench
 23 you will find three pieces of paper that are a copy of
 24 the flip chart.
 25 **A. Yes, sir.**

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1 Q. It looks, would this be right, that you used the
 2 information of the tour of duty being 4.30?
 3 **A. Yes, sir.**
 4 Q. The time at the beginning of the briefing at 6.00?
 5 **A. Yes.**
 6 Q. Over the page in your statement to page 2, the time that
 7 you left Leigh police station being 6.15?
 8 **A. Yes.**
 9 Q. Yes? And the registration number of the vehicle?
 10 **A. Have I recorded that down, sir?**
 11 Q. I thought you had.
 12 No, you are quite right, you haven't.
 13 The time of Amber and Red, you don't record I don't
 14 think?
 15 **A. No, sir.**
 16 Q. And yet they were on the flip chart?
 17 **A. That's correct, yes.**
 18 Q. Why didn't you use those?
 19 **A. I am unsure and looking at this I can only -- the**
 20 **relevance of that in my statement I thought would be**
 21 **minimal, because it would be recorded elsewhere and the**
 22 **specific accuracy, I knew that if I was asked how did**
 23 **you know it was 19.08, I wouldn't have -- I wouldn't**
 24 **have known that personally.**
 25 Q. The same with 19.12?

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1 **A. Yes, sir.**
 2 Q. Does that show that you were maybe slightly
 3 uncomfortable about the idea of a script on a board at
 4 the front?
 5 **A. It wouldn't be something I would normally have in front**
 6 **of me when completing a statement. However, you would**
 7 **potentially research elements like locations and street**
 8 **names if you were unsure.**
 9 Q. We can put the three sheets of paper from the briefing
 10 to one side.
 11 You deal in your statement with attending the
 12 briefing at 6.00 in the morning on Operation Shire, yes?
 13 **A. Yes, sir.**
 14 Q. Were you the planner for that briefing too?
 15 **A. It is possible, if it has run over, sir, and I was on**
 16 **both, then they were -- I think they were very similar**
 17 **briefings.**
 18 Q. Can you help us any more about that, whether you were or
 19 you were not the planner for it?
 20 **A. I would have been involved, if nothing has changed**
 21 **overnight with the previous briefing, then if the**
 22 **information was very same then it would stand that**
 23 **I would be responsible for both those briefings.**
 24 Q. Can you recall now whether the OFC, X7, checked the
 25 accuracy of the briefing for 2 March, the previous day?

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1 **A. Not specifically, sir, other than that would have been**
 2 **normal protocol. So I have to assume that he would have**
 3 **read over something that he was going to deliver.**
 4 Q. Same question for 3 March, same answer, is that right?
 5 **A. Same answer, sir, yes.**
 6 Q. Same question in relation to the TFC for 3 March,
 7 Mr Granby. Can you remember him having any involvement
 8 in the compilation of the briefing?
 9 **A. I can't remember sort of meeting Mr Granby or any face**
 10 **to face. Again, I would assume that this information**
 11 **has passed through the OFC to the TFC and that may have**
 12 **been done in isolation.**
 13 Q. There are a very small number of changes to the briefing
 14 as between 2 and 3 March, principally in relation to the
 15 working strategy, the way it is expressed and the
 16 tipping points.
 17 **A. Yes, sir.**
 18 Q. Were you responsible for making those amendments?
 19 **A. If they were sent to me or dictated to me, I would have**
 20 **changed those on the briefing.**
 21 Q. We don't have any evidence of any emails having been
 22 sent to you, unlike the previous day. Do you think they
 23 may have been dictated over your shoulder then?
 24 **A. Potentially or even seen from a book or handwritten or**
 25 **passed through the OFC.**

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<p>1 Q. If we turn to the general folder, please, at tab 22, 2 page 1267, the second paragraph: 3 "There is intelligence to suggest that these 4 subjects were responsible for a robbery in Preston ..." 5 A. Yes, sir. 6 Q. The reference to "these subjects", did you understand 7 that to be a reference to the three men, Mr Totton, 8 Mr Grainger and Mr Rimmer? 9 A. I would imagine it would -- whatever subjects are within 10 that briefing. 11 Q. I think it is only three on pages 68, 69 and 70, yes? 12 A. Yes. 13 I think on there we have got Totton, Rimmer and 14 Grainger as the subjects. 15 Q. Yes. 16 You would understand that to be a reference to those 17 three men? 18 A. Yes, sir. 19 Q. The paragraph begins, "There is intelligence to suggest 20 that ..." Would you understand that to mean that this 21 is not conviction information you are being told about? 22 A. Yes, I believe that to be intelligence that we are 23 working along, but obviously it wasn't good enough to 24 take any further. 25 Q. The phrases that are used to describe reliability of</p> <p style="text-align: center;">Page 61</p>	<p>1 intelligence about possession of firearms, a usual 2 component of a briefing? 3 A. If you are speaking directly about firearms then yes you 4 would like to know either way. However, I think it is 5 accepted that it is unlikely that we ever knew fully one 6 way or another, but I would like to say if there was 7 intelligence that would put a firearm or another weapon 8 in the hands of one of these individuals on that day, 9 I would want to know about it. 10 Q. That is certainly one thing and that is obviously 11 logical. I am talking about in every briefing, being 12 told one way or the other the positive or the negative. 13 Was that usual? 14 A. It probably wouldn't figure in every single briefing, 15 I am just trying to formulate the words that would be 16 used but we would receive all the intelligence that was 17 relevant and that was given to us. You wouldn't 18 necessarily have to say, "I know for a fact they have 19 got" or "they haven't", because a lot of the 20 intelligence lies somewhere between the centre ground so 21 they might not commit themselves either way. 22 Q. We know, there is no need for you to turn it up, that 23 the previous day Mr Lawler had given an assessment. He 24 said: 25 "There is no current information or intelligence to</p> <p style="text-align: center;">Page 63</p>
<p>1 intelligence, where does "There is intelligence to 2 suggest that ..." fit in the spectrum? 3 A. Probably somewhere in the middle is I think the -- they 4 are happy that they have got some intelligence that fits 5 the individuals, and they have felt it relevant enough 6 to mention. However, because there is no conviction 7 attached to it or further, then it is obviously not 8 right at the top of the spectrum as a definite known. 9 Q. To you as a firearms officer, relatively young in 10 service then, what would this mean to you in terms of 11 your risk assessment, a paragraph such as this? 12 A. I think again it gives you an overall flavour of the 13 type of individuals you are dealing with, so it suggests 14 to me that these individuals are involved in crime and 15 have been previously. 16 Q. The third and the fourth paragraphs of page 1267 relate 17 to the current situation, yes? 18 A. Yes, sir. 19 Q. You weren't being told on this occasion that there was 20 any current intelligence that the subjects would be in 21 possession or would be likely to be in possession of 22 firearms? 23 A. That's correct, yes. 24 Q. Was that kind of information, or intelligence, 25 ie whether or not one way or the other there was current</p> <p style="text-align: center;">Page 62</p>	<p>1 say the subjects either have possession or immediate 2 access to firearms or other less lethal weapons. 3 However my assumption is that they are about to commit 4 armed robbery based on their previous criminal 5 behaviour. They will either have firearms or less 6 lethal weapons. 7 A. Yes, sir. 8 Q. He specifically is saying, "I haven't got any current 9 intelligence but if you look at their past behaviour, 10 and it is currently assessed that they are about to 11 commit an armed robbery, they will have guns"?. 12 A. Yes, sir, I believe he is describing his rationale for 13 deploying us. 14 Q. Would that kind of quite nuanced statement be a usual 15 feature of firearms briefings? 16 A. I think I would class it as an individual style of 17 different TFCs, so you could have someone who would 18 explain their rationale a little bit fuller and then you 19 would have others that would just give you bullet point 20 information. 21 Q. You were given the threat assessment of Messrs Totton, 22 Rimmer and Grainger. If we look at Mr Totton first at 23 1268, he is down as having three warnings, possession of 24 a shotgun, use of an iron bar and 10 incidents of 25 assault.</p> <p style="text-align: center;">Page 64</p>

1 **A. Yes, sir.**
 2 Q. Being the receiver of this information rather than the
 3 author of it, would you understand any of that to relate
 4 to conviction data?
 5 **A. It wouldn't necessarily, looking at the terminology**
 6 **used, that could be open to interpretation, so that**
 7 **would show to me that he is connected to those**
 8 **incidents, not necessarily convictions.**
 9 Q. Is that because if it was conviction data you would
 10 expect it to be said?
 11 **A. More than likely. Again, this would be down to the**
 12 **author of this and again slightly different styles**
 13 **because it is not as prescriptive, you are trying to**
 14 **give officers, or for me it would be a flavour of that**
 15 **individual and what those warnings related to.**
 16 Q. If you look over the page for Mr Rimmer, you can see
 17 that there was mention of him having been convicted of
 18 an offence.
 19 **A. Yes.**
 20 Q. Yes?
 21 For Mr Grainger at 1270, would you take that to be
 22 either conviction data or not, it is ambiguous?
 23 **A. Yes, similar to the first, you could read that either**
 24 **way.**
 25 Q. For each of the men their intent was said to be

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1 conspiracy to commit armed robbery. Would you
 2 understand that to mean necessarily involving and only
 3 involving firearms?
 4 **A. No, sir. Any element of arming yourself.**
 5 Q. With a weapon?
 6 **A. Yes, sir.**
 7 Q. Which could be a bat, a knife or other weapon right up
 8 to a firearm?
 9 **A. Yes, sir.**
 10 Q. Similarly on 1267, the intent of the subjects as a whole
 11 in the first line was said to be, "... believed to be
 12 engaged in armed robberies", would you answer the same
 13 way, that "armed" didn't necessarily mean and only mean
 14 firearms?
 15 **A. That's correct.**
 16 Q. Just tell us why that is?
 17 **A. We deployed on numerous individuals and numerous jobs,**
 18 **not all of those involve a firearm, and we will also**
 19 **deal with what we class as "otherwise so dangerous". So**
 20 **a broad spectrum of individuals that an unarmed police**
 21 **officer is felt that it would be too dangerous for those**
 22 **to deal with.**
 23 Q. If you can help us on this, would you say that would be
 24 a fairly common view amongst firearms officers or is the
 25 one that you are expressing an unusual one?

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1 **A. No, every firearms officer has dealt with numerous**
 2 **individuals with different weaponry and you would hope**
 3 **to glean from the intelligence what weaponry that may**
 4 **be.**
 5 Q. Thank you.
 6 You had the briefing and you went to a lay up point
 7 at Leigh police station --
 8 **A. Yes, sir.**
 9 Q. -- and you remained there until I think about 6.15?
 10 **A. Yes, sir.**
 11 Q. What did you do in that time?
 12 **A. From memory, the cars were parked, I was either in the**
 13 **vehicle or I think there was a small TV room there.**
 14 Q. You say in your statement that:
 15 "Throughout the day I received regular intelligence
 16 updates via the operation the firearms commander."
 17 **A. Yes, sir.**
 18 Q. What intelligence updates did you receive?
 19 **A. I can't remember any specifics. Again, working on**
 20 **knowledge of previous jobs, it would be a case of if we**
 21 **were away from the vehicles, so not everyone has got**
 22 **a radio on, the OFC would be monitoring and it would**
 23 **come back with locations of our subjects or anything**
 24 **that is changing, either they are on the move towards us**
 25 **or they are out of the house or just generally**

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1 **monitoring the surveillance feed.**
 2 Q. Did you receive any updates that suggested that the
 3 intelligence picture had developed to suggest that the
 4 subjects would be or might be armed?
 5 **A. Not from memory, sir.**
 6 Q. Or indicating that they intended to carry out a robbery
 7 that night?
 8 **A. We were there on the premise that they were intending to**
 9 **carry out a robbery, so I suppose as they --**
 10 Q. I am talking about any further intelligence updates that
 11 specifically suggested that.
 12 **A. Not on top of what we were initially given other than to**
 13 **the point where they got to the stolen car.**
 14 Q. Yes.
 15 Were you told that from about 5.30 that night the
 16 command team believed that Robert Rimmer would not be in
 17 the Audi?
 18 **A. I don't remember that information, sir.**
 19 Q. Indeed if you look at your first witness statement,
 20 tab 1 at page 2.
 21 **A. Yes, sir.**
 22 Q. Four paragraphs in, you say:
 23 "Whilst here [I appreciate I am moving forward
 24 a little bit] I received information that the subjects
 25 of the operation were in a red Audi in the car park."

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<p>1 Yes?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Your reference to "the subjects of the operation", did</p> <p>4 you mean there Mr Grainger, Mr Rimmer and Mr Totton?</p> <p>5 A. I am unsure there. I suppose I could read that either</p> <p>6 way. The subjects that I either knew to be in the car.</p> <p>7 Q. You cannot now recall what you meant by that?</p> <p>8 A. Yes, I am unable to say exactly if I knew exact</p> <p>9 individuals were in that car or whether my reference to</p> <p>10 "subjects" is just the subjects that were in the</p> <p>11 vehicle.</p> <p>12 Q. You don't now recall receiving any intelligence that</p> <p>13 Mr Rimmer was assessed not to be in the vehicle --</p> <p>14 A. Not that I recall, sir.</p> <p>15 Q. -- and had been replaced by a third unknown male?</p> <p>16 A. It is possible it came, but not that I can recall and be</p> <p>17 100 per cent accurate about.</p> <p>18 Q. In the course of the day, before you deployed at about</p> <p>19 6.15, were you a party to a discussion with Q9 about the</p> <p>20 subjects' alleged involvement with previous offences?</p> <p>21 A. No, not that I remember.</p> <p>22 Q. Did you hear X7 intervening and perhaps putting Q9 right</p> <p>23 about those that had been convicted of previous offences</p> <p>24 that he was talking about?</p> <p>25 A. No, I have no memory of that, sir.</p> <p style="text-align: center;">Page 69</p>	<p>1 A. From Leigh, I would have moved because I was told to</p> <p>2 move, sir, by the OFC.</p> <p>3 Q. Who was in the charlie vehicle with you?</p> <p>4 A. I had J4 in the vehicle with myself.</p> <p>5 Q. Which seat were you in?</p> <p>6 A. I am the driver of charlie vehicle.</p> <p>7 Q. Was J4 front nearside?</p> <p>8 A. J4 was front nearside.</p> <p>9 Q. Who was in the back?</p> <p>10 A. I had G11 in the rear offside seat.</p> <p>11 Q. He was sitting behind you?</p> <p>12 A. And Z15 in the rear nearside seat.</p> <p>13 Q. What were you wearing?</p> <p>14 A. I can't give specifics, other than it will have been</p> <p>15 plainclothes.</p> <p>16 Q. Did you have any visible identification as a police</p> <p>17 officer?</p> <p>18 A. No, sir.</p> <p>19 Q. Did that continue to be the case up to and including the</p> <p>20 point of the strike?</p> <p>21 A. Yes, sir.</p> <p>22 Q. You I don't think had donned a respirator?</p> <p>23 A. No, sir.</p> <p>24 Q. And you didn't pull out any markings on a police strike</p> <p>25 jacket?</p> <p style="text-align: center;">Page 71</p>
<p>1 Q. You say in the statement here that you relocated from</p> <p>2 Leigh police station to a pub car park, yes?</p> <p>3 A. Yes.</p> <p>4 Q. Outside Culcheth town centre. Can you remember what you</p> <p>5 were told that caused you to relocate?</p> <p>6 A. I believe it is that the individuals were in the stolen</p> <p>7 vehicle and were coming the way of Culcheth.</p> <p>8 Q. We know now that they weren't spotted in the vehicle</p> <p>9 until 6.29. That this time of 6.15, if it was</p> <p>10 conditional upon such a sighting, must be wrong, yes?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Was it the sighting of the subjects in the vehicle that</p> <p>13 caused you to move from Leigh police station to the car</p> <p>14 park?</p> <p>15 A. It is possible. Either a sighting of them in the</p> <p>16 vehicle or a loss of that vehicle would mean we would</p> <p>17 want to be closer in case it was seen right on plot and</p> <p>18 we were miles away.</p> <p>19 Q. Okay, there wouldn't have been a loss because they</p> <p>20 weren't in it yet, until 6.29.</p> <p>21 Is the answer that you cannot recall now why you</p> <p>22 moved to Leigh?</p> <p>23 A. I would have --</p> <p>24 THE CHAIRMAN: From Leigh.</p> <p>25 MR BEER: From Leigh.</p> <p style="text-align: center;">Page 70</p>	<p>1 A. No, sir. I wasn't wearing a police strike jacket.</p> <p>2 Q. You didn't put a police cap on?</p> <p>3 A. No, sir.</p> <p>4 Q. Was there any reason for that, that you didn't at any</p> <p>5 stage wear any identifiable markings as a police</p> <p>6 officer?</p> <p>7 A. Yes, my intention was to wear the respirator. However</p> <p>8 having got out of the vehicle I didn't locate it in time</p> <p>9 and made the decision to go without it.</p> <p>10 Q. What about police markings, ie other markings that</p> <p>11 identified you as a police officer?</p> <p>12 A. That for me on that evening would have either been</p> <p>13 a police baseball cap or the respirator itself.</p> <p>14 Q. Why didn't you put the cap on?</p> <p>15 A. I didn't have it there because my full intention was to</p> <p>16 wear the respirator, so as the driver I have only got</p> <p>17 limited space for all the things around me without</p> <p>18 infringing on the driving. So I had made the decision</p> <p>19 to have the respirator.</p> <p>20 Q. And you didn't further on because?</p> <p>21 A. As we pulled up to a stop, I didn't manage to locate it</p> <p>22 in time. It had obviously dropped out of the way and</p> <p>23 I was not prepared to search the vehicle for the</p> <p>24 respirator before making my way forward.</p> <p>25 Q. You parked in the pub car park and received the</p> <p style="text-align: center;">Page 72</p>

1 information that the subjects were in the red Audi, in
 2 the right-hand corner, far corner, of a car park off
 3 Jackson Avenue?
 4 **A. Yes.**
 5 Q. We know that, according to a number of officers, that
 6 either at 7.08 or about 7.10, State Amber was declared?
 7 **A. Yes, sir.**
 8 Q. In the time that passed between you moving off, which
 9 you have put at about 6.15 from the police station, and
 10 7.08, 7.10, what did you do?
 11 **A. From driving and then we held up at a public house.**
 12 Q. Yes.
 13 **A. I would have just been driving, sir, maintaining the two**
 14 **vehicles in front and listening to any surveillance**
 15 **commentary that was coming through.**
 16 Q. We know from surveillance evidence that the vehicle was
 17 in fact parked up in the position that it stayed in the
 18 car park off Jackson Avenue from at least 6.45.
 19 In the between 25 and 30 minutes before the strike
 20 was called, what did you do in the pub car park?
 21 **A. I think we just sat and waited, sir.**
 22 Q. Was there any discussion in that time as to the tactics
 23 that were to be employed if a strike was called?
 24 **A. Not within our vehicle, sir. That would have come from**
 25 **the lead vehicle. And if it wasn't given, then it would**

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1 **have been a case of following the two vehicles up front**
 2 **and placing myself in the best possible position.**
 3 Q. In your witness statement of 9 March you don't describe
 4 any such conversation within your vehicle, but nor do
 5 you describe any broadcast by X7 in the alpha vehicle on
 6 the tactics to be adopted. Yes?
 7 **A. Yes, that's correct.**
 8 Q. Is that reflective of the fact that there wasn't
 9 a broadcast by X7 on the tactics to be adopted, and it
 10 was left to each car to fill in and find work for
 11 themselves?
 12 **A. I am unsure now whether that omission means that it**
 13 **wasn't or whether it was just an omission of that fact.**
 14 Q. Can you look at your statement, please, at the second
 15 page. In the paragraph between the hole-punches you
 16 say:
 17 "A short time later we moved from our holding point
 18 with a view to relocating our police vehicles closer to
 19 the area in which the subjects' vehicle had stopped. It
 20 was whilst en route to this location it was announced
 21 over the radio we were now on State Amber."
 22 Yes.
 23 **A. Yes, sir.**
 24 Q. "I followed the alpha and bravo vehicles as they made
 25 their way in convoy along Warrington Road, as I turned

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1 off Warrington Road onto Common Lane it was announced we
 2 were State Red."
 3 Then you turned on to the car park?
 4 **A. Yes, sir.**
 5 Q. Yes.
 6 Do you now have any recollection of hearing any
 7 radio broadcast by X7 as to what the plan was?
 8 **A. No, I've got no recollection. I do remember the items**
 9 **that were in the statement though, the calling of the**
 10 **states.**
 11 Q. Can you recall any discussion between cars about whether
 12 any other tactical options were considered?
 13 **A. Not as I remember, sir.**
 14 Q. Can you recall any discussion as to the thing that X7
 15 had said the previous day, that the safest option is to
 16 let them get out of the vehicle?
 17 **A. I certainly don't remember anything.**
 18 Q. May be, it may well be the safest option is to let them
 19 get out of the vehicle?
 20 **A. I don't remember any discussion along those lines, sir.**
 21 Q. As you drove on to the car park therefore, did you
 22 understand your duty to be to keep up with the alpha and
 23 bravo vehicles and to deposit the other three members of
 24 your team in proximity to the bravo vehicle?
 25 **A. Yes, sir. Would you like me to expand on the charlie**

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1 **role?**
 2 Q. Yes, please.
 3 **A. Charlie, and to an extent the delta, because you are at**
 4 **the back of that convoy, you are not necessarily**
 5 **involved in the initial blocking at that stage, so you**
 6 **have got that overview just to see where best fit to put**
 7 **that vehicle. So to either weight your individuals to**
 8 **one side of the vehicle or indeed if the vehicle was to**
 9 **escape the block, you may be called into action to block**
 10 **the vehicle as well.**
 11 Q. As you turned on to the car park, did J4 ask you to hold
 12 back slightly?
 13 **A. Yes, my recollection was he was concerned that three**
 14 **vehicles going in nose to tail would look out of place,**
 15 **so he just wanted a bit of a gap to create a bit more**
 16 **normality about the vehicles entering.**
 17 Q. Did you hold back about three car lengths then?
 18 **A. Yes, sir.**
 19 Q. You say that you then accelerated onto the car park and
 20 brought your vehicle to a stop directly behind the bravo
 21 vehicle. Was that vehicle, the bravo vehicle, stopped
 22 by the time that you pulled up?
 23 **A. By the time, yes, my vehicle had stopped, both the two**
 24 **vehicles in front had already stopped.**
 25 Q. What could you see when you stopped?

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<p>1 A. The back of the bravo vehicle.</p> <p>2 Q. Could you see any officers getting out of it?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Could you see the alpha vehicle at this time?</p> <p>5 A. Not directly. Again, as officers started to come out,</p> <p>6 I will have been aware of people moving.</p> <p>7 Q. Which officers did you see get out of the bravo vehicle?</p> <p>8 A. I couldn't give specifics, sir. I just saw officers</p> <p>9 wearing respirators getting out.</p> <p>10 Q. Did you shout, "Out, out, out" as your vehicle stopped?</p> <p>11 A. Yes, just to let everyone know that I was not</p> <p>12 anticipating moving. As I discussed previously, you may</p> <p>13 move to perform a secondary block.</p> <p>14 Q. You looked for but couldn't find your respirator; is</p> <p>15 that right?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Did you then get out of the charlie vehicle?</p> <p>18 A. Yes, sir.</p> <p>19 Q. What other officers did you see, or where were they?</p> <p>20 A. They were all approaching the subject vehicle from</p> <p>21 numerous different locations.</p> <p>22 Q. Can you now describe what they were doing?</p> <p>23 A. Not specifics of individuals, but they were approaching</p> <p>24 the vehicle, some with weapons drawn and others were</p> <p>25 just approaching on foot.</p> <p style="text-align: center;">Page 77</p>	<p>1 Q. Yes.</p> <p>2 THE CHAIRMAN: Yes.</p> <p>3 MR BEER: Thank you.</p> <p>4 You are the light coloured rectangle at the foot of</p> <p>5 the page?</p> <p>6 A. Yes, sir.</p> <p>7 Q. If you could just using the other three rectangles</p> <p>8 describe with your went then, please?</p> <p>9 A. I think from my statement, I couldn't remember whether</p> <p>10 I passed in between the nose of my vehicle and the rear</p> <p>11 of bravo or whether I in fact went in front of the nose</p> <p>12 of the bravo and the rear of the alpha, so between the</p> <p>13 two, the lighter blue and the darker blue.</p> <p>14 Q. Yes.</p> <p>15 A. But however I managed to get there, I was ultimately</p> <p>16 running down the left-hand side of those three</p> <p>17 rectangles.</p> <p>18 Q. Towards the hedge?</p> <p>19 A. Towards the hedge, yes.</p> <p>20 Q. Why did you decide to run towards the hedge?</p> <p>21 A. Having got out of my vehicle, my initial impression was</p> <p>22 that there seemed to be an awful lot of officers on the</p> <p>23 nearside of the red Audi so again, as I am sure you are</p> <p>24 familiar with the terminology, looking for work, I was</p> <p>25 thinking, well, I will go where everyone else is not</p> <p style="text-align: center;">Page 79</p>
<p>1 Q. When you say "some with weapons drawn", in what position</p> <p>2 had they their weapons drawn?</p> <p>3 A. On aim towards the vehicle.</p> <p>4 Q. And others of them didn't have their weapons drawn?</p> <p>5 A. If you were further back behind, sir, yes, you certainly</p> <p>6 wouldn't be pointing your weapon up at anybody else in</p> <p>7 front of you.</p> <p>8 Q. Would it just be in the low position?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Where did you go?</p> <p>11 A. Ultimately or initially?</p> <p>12 Q. Initially?</p> <p>13 A. Initially, I exited my door and then I made my way</p> <p>14 through to left-hand side of the vehicle, so the near</p> <p>15 hand side of the convoy of vehicles.</p> <p>16 Q. If you just take out file 2, please.</p> <p>17 THE CHAIRMAN: That is the nearside of the police vehicle,</p> <p>18 we are talking about?</p> <p>19 A. Yes. Yes, sir.</p> <p>20 MR BEER: Look in either tab 28 or 29. What I am looking</p> <p>21 for is this diagram.</p> <p>22 A. 629, sir?</p> <p>23 Q. 586 mine is, but if yours is on 629 then I am happy to</p> <p>24 use that.</p> <p>25 A. Similar?</p> <p style="text-align: center;">Page 78</p>	<p>1 going to cover that angle.</p> <p>2 Q. Did you have your weapon in the low port position at</p> <p>3 this time?</p> <p>4 A. Yes, sir. It would have been a sidearm.</p> <p>5 Q. Which weapon was it?</p> <p>6 A. It would have been a Glock SLP.</p> <p>7 Q. I see, so was it still holstered at this point?</p> <p>8 A. It would have been holstered, yes, sir.</p> <p>9 Q. With your hand on it?</p> <p>10 A. Yes, sir.</p> <p>11 Q. You ran down towards the hedge, yes?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Did you get between the alpha vehicle and the hedge?</p> <p>14 A. Yes, I managed to squeeze over between the bonnet and</p> <p>15 the hedge of the alpha.</p> <p>16 Q. By this point, had you seen any of the occupants of the</p> <p>17 subject vehicle?</p> <p>18 A. No, sir.</p> <p>19 Q. Had you noticed an officer in the rear offside seat of</p> <p>20 the alpha vehicle?</p> <p>21 A. No, sir.</p> <p>22 Q. Did you know, because of anything that had been</p> <p>23 announced to you, that he was going to be there?</p> <p>24 A. No, sir.</p> <p>25 Q. So you squeezed between the bonnet of the alpha and the</p> <p style="text-align: center;">Page 80</p>

<p>1 hedge, yes? 2 A. Yes, sir. 3 Q. What did you see when you got beyond the bonnet of the 4 alpha? 5 A. I believe it was X7. 6 Q. Yes. 7 A. And there was another officer down that side as well, 8 I believe that was G6. Although my statement will 9 confirm. 10 Q. They are both in your statement. Where was X7? 11 A. X7 was at the driver window of the red Audi. 12 Q. What was he doing? 13 A. He was pointing his firearm through or into the aperture 14 of the window at the driver. 15 Q. Was the deliver's window open or closed? 16 A. I believe from my statement I could just say that there 17 was no window there. Whether that be smashed or fully 18 open, my memory is that there was no window in place. 19 Q. And what weapon did X7 have drawn? 20 A. I believe it was an MP5. 21 Q. What was he shouting at the driver? 22 A. I think my statement has got specifics. I would guess 23 that it would be, "Armed police, show me your hands", as 24 that would be a standard. 25 Q. What, if anything, was the driver doing?</p> <p style="text-align: center;">Page 81</p>	<p>1 Q. You describe trying to open the driver's door? 2 A. Yes, sir. 3 Q. But it was locked? 4 A. Yes, sir. 5 Q. You reached in and tried to find the handle but you 6 couldn't find the handle? 7 A. Correct, sir. 8 Q. Did other officers then join you? 9 A. Yes, we were joined by other officers. Although I am 10 unable to say which ones. 11 Q. Did you pull your Taser out then? 12 A. Yes, sir. 13 Q. Why did you pull your Taser out rather than your Glock? 14 A. We had conventional firearm already in place. I was 15 confused by the driver's actions, unsure whether he was 16 just not complying for whatever reason or whether he had 17 fainted or numerous different reasons. So I wanted to 18 be sure that we had other means of controlling that 19 driver other than just a conventional firearm. 20 Q. Is it within your knowledge that sometimes on operations 21 like this subjects faint? 22 A. We have had a subject faint in the past, yes, sir. 23 Q. Not just operations in which you have personal knowledge 24 of subjects fainting, but a known phenomenon? 25 A. I suppose any shocking incident has got that ability but</p> <p style="text-align: center;">Page 83</p>
<p>1 A. From the entire time that I saw the driver, he was doing 2 nothing. 3 Q. Where did you go? 4 A. I went to assist X7. 5 Q. How close did you get to X7? 6 A. I was stood side by side. 7 Q. Did you look into the cabin of the vehicle? 8 A. Yes, sir. 9 Q. What did you notice, if anything, about the driver? 10 A. The driver was completely unresponsive. His eyes were 11 shut, his arms were by his side. 12 Q. If you just look at your statement, which is tab 1, at 13 page 3. 14 A. Yes, sir. 15 Q. You just told us that he had his hands by his side. 16 Three paragraphs from the bottom you say, "He had his 17 hands on his lap". 18 A. That would be the most accurate description, sir. 19 Q. Can you now recall how he had his hands on his lap? 20 A. No, sir. Not without sort of guessing. 21 Q. Was there anything on his lap? 22 A. Not that -- 23 Q. Any objects other than his hands? 24 A. I would have noted it, if I had seen it in the 25 statement.</p> <p style="text-align: center;">Page 82</p>	<p>1 I have experience of two occasions where this has 2 happened. 3 Q. What I am getting at is that it is something that 4 firearms officers know may happen, it is a recognised 5 thing? 6 A. I maybe wouldn't go as far as that, sir. I just think 7 that between us because we have had it and we spoke 8 about it, it is not something that would have been 9 discussed on training as a phenomenon, I wouldn't say it 10 is the norm but because we as a team has had experience 11 of it, we had knowledge between us. 12 Q. Would you include within your team Q9? 13 A. Yes, sir. 14 Q. Was there an attempt to remove the driver from the 15 driver's seat? 16 A. Yes, I think as we got more individuals there, we 17 certainly tried to take -- certainly take hold of 18 Mr Grainger's hands, initially, and then there was some 19 discussion of trying to maybe remove him from the window 20 if we couldn't get the door open. 21 Q. Did U2 then shout that you should take the driver out 22 via the other door, front -- 23 A. Yes, there was a shout from the other side that it would 24 be better to remove him from the other side. 25 Q. As that occurred, as he was pulled out, did you notice</p> <p style="text-align: center;">Page 84</p>

<p>1 blood on his chest area?</p> <p>2 A. Yes, at that point, as he leant from being on the</p> <p>3 driver's side towards the passenger side, I think</p> <p>4 a jacket may have fallen open and that is when I have</p> <p>5 noticed a mark on the chest.</p> <p>6 Q. Was he then pulled out?</p> <p>7 A. Yes, other officers then removed him from the vehicle.</p> <p>8 Q. Now, in -- I have been following the text of your first</p> <p>9 statement there, you haven't described hearing a shot,</p> <p>10 is that right? That by that time you hadn't heard any</p> <p>11 shot fired?</p> <p>12 A. No, I was completely unaware of any shots having been</p> <p>13 fired.</p> <p>14 Q. You didn't know by this time that Q9 had fired his</p> <p>15 weapon that caused the injury to Mr Grainger?</p> <p>16 A. No, sir.</p> <p>17 Q. Had you seen the hole, the bullet hole, in the front</p> <p>18 windscreen of the subject vehicle?</p> <p>19 A. No, sir.</p> <p>20 Q. You also haven't described hearing the front nearside</p> <p>21 window of the subject vehicle being smashed?</p> <p>22 A. No, I don't believe I heard that either.</p> <p>23 Q. Or the CS incapacitant, the canister being thrown in?</p> <p>24 A. I don't 100 per cent remember that being thrown in, but</p> <p>25 I remember it being within the cabin or the effects of</p> <p style="text-align: center;">Page 85</p>	<p>1 the only one that I really remember hearing is that</p> <p>2 there was one later on, so certainly either while I was</p> <p>3 at the window or during this process of trying to open</p> <p>4 the door.</p> <p>5 Q. Did you see the passenger of the vehicle at all?</p> <p>6 A. No.</p> <p>7 Q. Did you see the rear seat passenger of the vehicle at</p> <p>8 all?</p> <p>9 A. No.</p> <p>10 Q. You describe in a statement you made in 2014 that after</p> <p>11 everyone had been taken out of the vehicle, you remember</p> <p>12 hearing the car radio playing?</p> <p>13 A. Yes, I don't know why that stuck with me but as</p> <p>14 a memory, yes, I remember the car radio being on.</p> <p>15 Q. To your knowledge did anyone switch it on, any police</p> <p>16 officer or it was just it appeared to you to have been</p> <p>17 on at the time of the incident?</p> <p>18 A. Yes, as soon as sort of a little bit of quietness had</p> <p>19 descended around the vehicle, so the shouting had</p> <p>20 stopped, I was aware that the car radio was on.</p> <p>21 Q. Did you assist in the provision of trauma care to</p> <p>22 Mr Grainger?</p> <p>23 A. Yes, sir.</p> <p>24 Q. What did you do?</p> <p>25 A. I was delivering chest compressions together with</p> <p style="text-align: center;">Page 87</p>
<p>1 that being within the cabin.</p> <p>2 Q. When do you remember that, those effects?</p> <p>3 A. Whilst I was trying to get the handle, the inside handle</p> <p>4 of the door open.</p> <p>5 Q. Ie you remember the effects upon you?</p> <p>6 A. Yes, and seeing visually it building within the cabin.</p> <p>7 Q. What effect did it have on you?</p> <p>8 A. It did perform exactly as it should and it was</p> <p>9 an irritant for myself as well, albeit I was not within</p> <p>10 the cab. As I started to get closer towards, it became</p> <p>11 difficult to stay within the cabin to search for the</p> <p>12 handle.</p> <p>13 Q. Your eyes started to run, you started to cough, that</p> <p>14 kind of thing?</p> <p>15 A. Yes, just sort of not the full effects of it but you</p> <p>16 could tell it was starting to effect you, your nose was</p> <p>17 starting to get itchy and you started to cough.</p> <p>18 Q. You also haven't described the sound of the shotgun</p> <p>19 deflating the tyres.</p> <p>20 A. No.</p> <p>21 Q. Did you hear that?</p> <p>22 A. I have a vague recollection of the shotgun round going</p> <p>23 off.</p> <p>24 Q. Can you recall at what stage that was?</p> <p>25 A. I certainly remember one seemed quite late, it might be</p> <p style="text-align: center;">Page 86</p>	<p>1 I think it was V3 for quite a long time as I remember</p> <p>2 it, until we got some definitive care to the scene.</p> <p>3 Q. Before you started chest compressions, did you go and</p> <p>4 get the defibrillator or was it provided to you?</p> <p>5 A. I believe that I went to one of the vehicles to try and</p> <p>6 grab as much trauma kit as I could, and that would have</p> <p>7 involved a defibrillator.</p> <p>8 Q. Did you set the defibrillator up in case it was</p> <p>9 required?</p> <p>10 A. I think I started to. I opened it up and started to get</p> <p>11 it prepped and then I moved on to chest compressions.</p> <p>12 Q. You said that you, with others, delivered chest</p> <p>13 compressions until definitive care arrived. By that do</p> <p>14 you mean the paramedics?</p> <p>15 A. Yes, the ambulance personnel that were called to the</p> <p>16 scene.</p> <p>17 Q. Did you later move to Claytonbrook to take part in</p> <p>18 a post-incident procedure?</p> <p>19 A. Yes, sir.</p> <p>20 Q. In the course of that post-incident procedure, were you</p> <p>21 stationed with the other officers, the other AFOs?</p> <p>22 A. Yes, we were all in the same room.</p> <p>23 Q. Was there discussion about what had happened, what had</p> <p>24 gone right, what had gone wrong on the operation?</p> <p>25 A. No, I think everyone was acutely aware as the</p> <p style="text-align: center;">Page 88</p>

<p>1 post-incident procedure, that it was really important</p> <p>2 that we didn't confer and we were just sat basically</p> <p>3 waiting to be told what to do.</p> <p>4 Q. How long were you sat waiting to be told what to do?</p> <p>5 A. From memory, quite a long time, I can't, I think it</p> <p>6 possibly -- well, I am assuming it would be recorded</p> <p>7 elsewhere but it felt like quite a long time.</p> <p>8 Q. We know that according to your notebook, you I think</p> <p>9 went off duty at 6.00 that morning. Does that sound</p> <p>10 about right?</p> <p>11 A. That sounds accurate, sir, yes.</p> <p>12 Q. In the course of that, I think you had to unload and</p> <p>13 deal with your weapons. Is that right?</p> <p>14 A. Yes, sir, they were forensically recovered from us.</p> <p>15 Q. Other than that, what happened in the nearly I think</p> <p>16 11 hours between the time of the incident and going off</p> <p>17 duty?</p> <p>18 A. We initially sat together, I think at some point we will</p> <p>19 have eaten something, they were -- people that were</p> <p>20 becoming involved in the post-incident manager, I think</p> <p>21 a representative from the federation was there and</p> <p>22 I think the biggest time delay was that because they</p> <p>23 were taking the weapons off us forensically and that was</p> <p>24 being done one at a time, we were waiting for ages just</p> <p>25 for the process of going downstairs and having those</p> <p style="text-align: center;">Page 89</p>	<p>1 Audi, yes?</p> <p>2 A. Yes.</p> <p>3 Q. Can you see the wall just behind it?</p> <p>4 A. I can, yes, sir.</p> <p>5 Q. Because part of your role would have been to ensure --</p> <p>6 you were kind of backup to ensure that the Audi couldn't</p> <p>7 escape, essentially, which is why it wanted to be</p> <p>8 blocked in, correct?</p> <p>9 A. It is one of the roles, sir, yes.</p> <p>10 Q. Okay, so I am just focusing on that and in particular</p> <p>11 the distance between the wall at the back and the red</p> <p>12 Audi.</p> <p>13 If we just have a look at that photograph, so if you</p> <p>14 now turn to 310, just a few pages on.</p> <p>15 A. Yes, sir.</p> <p>16 Q. Right. Just bear that in mind, I know that the boot is</p> <p>17 opened at the back but just to give you an impression of</p> <p>18 the distance.</p> <p>19 Just move forward to 320.</p> <p>20 A. Yes.</p> <p>21 Q. I am catching up on my computer, because I do not have</p> <p>22 a hard copy.</p> <p>23 Yes?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Again, 320 is a side-on view, with the boot open, again,</p> <p style="text-align: center;">Page 91</p>
<p>1 recovered from ourselves.</p> <p>2 Q. Was there any discussion about what had happened?</p> <p>3 A. No, sir.</p> <p>4 MR BEER: Thank you very much.</p> <p>5 Those are the questions that I ask.</p> <p>6 THE CHAIRMAN: Do you have questions, Mr Thomas?</p> <p>7 MR THOMAS: Just a couple, sir.</p> <p>8 Questions from MR THOMAS</p> <p>9 MR THOMAS: Good morning, H9.</p> <p>10 A. Good morning.</p> <p>11 Q. I represent Mr Grainger's family, this is his mother</p> <p>12 sitting next to me, okay. I only have a few questions</p> <p>13 for you.</p> <p>14 I wonder if you could take out bundle O, number 1.</p> <p>15 It is some photographs.</p> <p>16 THE CHAIRMAN: O1 is several files. Do you have a page</p> <p>17 number?</p> <p>18 MR THOMAS: I do.</p> <p>19 THE CHAIRMAN: I think it is, anyway.</p> <p>20 MR THOMAS: If we can start at page 306.</p> <p>21 THE CHAIRMAN: It is the second bundle.</p> <p>22 MR THOMAS: H9, while you are turning that up, 306.</p> <p>23 A. Yes, I am with you, sir.</p> <p>24 Q. Okay, I just want to take you to about four photographs</p> <p>25 and it is in relation to the positioning of the red</p> <p style="text-align: center;">Page 90</p>	<p>1 it gives you the impression just how close it is.</p> <p>2 Then if you go to 323, on a few pages.</p> <p>3 A. Yes.</p> <p>4 Q. Yes?</p> <p>5 325, again it is an aerial shot but it gives</p> <p>6 a pretty good idea as to the distance, can you see that?</p> <p>7 A. Yes, that is probably the best picture of the distance</p> <p>8 behind, isn't it.</p> <p>9 Q. Yes, really we are just talking -- I don't want to lead</p> <p>10 evidence: roughly what would you say the distance was?</p> <p>11 A. Looking at this picture, it looks to be circa six/seven</p> <p>12 foot.</p> <p>13 Q. It is very close, isn't it, between the back of that to</p> <p>14 the vehicle.</p> <p>15 Second question, my final topic. In relation to the</p> <p>16 journey as you were going into the car park, one of the</p> <p>17 questions that Mr Beer was asking you was in relation to</p> <p>18 a discussion about planning?</p> <p>19 A. Yes, sir.</p> <p>20 Q. In all of the witness statements that you have made,</p> <p>21 there is no mention of any discussion about a plan.</p> <p>22 Yes?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Just help me with this. All of you firearms officers</p> <p>25 are trained in relation to minimising risks, pursuant to</p> <p style="text-align: center;">Page 92</p>

<p>1 your duty under article 2, preservation of life. 2 Correct? 3 A. Yes, sir. 4 Q. Bearing in mind the risks to not just yourselves or the 5 general public but also to the subjects of your 6 investigation, correct? 7 A. That's correct, sir, yes. 8 Q. This was the first firearms -- sorry, this was the first 9 fatality that you had been involved in. Am I right? 10 A. Yes, sir. 11 Q. There was a period of time when you had to reflect 12 before you put pen to paper, as it were, to give your 13 detailed account? 14 A. Yes, sir. 15 Q. You knew the importance, because you knew that this case 16 was going to be looked at by the IPCC? 17 A. Yes. 18 Q. There would be an investigation because there had been 19 a fatality. Had there been, and this is what I am 20 putting to you, okay, had there been a plan, surely that 21 would have been something that you would have 22 documented? 23 A. It is possible, sir, but I think you have run through 24 this situation -- we have been in these situations of 25 deploying on to vehicles numerous times. Having</p> <p style="text-align: center;">Page 93</p>	<p>1 Q. We know from the PowerPoint briefing, we don't need to 2 look it up but just for the record F/1277, that in your 3 car there was a camera. 4 A. Not that I remember, sir. 5 Q. You don't remember. Well I am afraid we are going to 6 have to look at it then. Can I just ask you to look in 7 the general firearms bundle at tab 22, please. It is at 8 page 1277. 9 This is a page from the 3 March PowerPoint briefing. 10 A. Yes, sir. 11 Q. If you look at the kit in each of the cars: 12 "Charlie vehicle, trauma pack, defibrillator, 13 shield, tablet, three, camera." 14 A. Yes, sir. 15 Q. There is no camera in any of the other three cars. What 16 was the camera for? 17 A. Looking at that and knowing or believing there was no 18 camera in there, that is possibly a hangover from some 19 of the cut and pastes that was done from previous, 20 because I would very much doubt there would be a loft 21 ladder in the bravo vehicle either. 22 Q. Right. I am not sure you are correct about that, but 23 that is not the focus of my questions. What would you 24 have a camera for? 25 A. It would be for recce work.</p> <p style="text-align: center;">Page 95</p>
<p>1 absolute clarity about what was said in that position 2 which was a very traumatic position, it is then 3 difficult -- I am not saying there was definitely 4 nothing discussed in there, but I can't remember because 5 of the events that overtook that at the scene. So 6 these, what I will consider periphery things, I can't be 7 100 per cent because my mind is firmly locked on what 8 happened at that scene and delivering chest compressions 9 to that individual for 20 minutes. 10 Q. That I understand, but, H9, this is right, isn't it, how 11 many statements did you make in all? 12 A. I would have to count, sir, but there is quite a few. 13 THE CHAIRMAN: Five. 14 MR THOMAS: Five statements. In none of your five 15 statements when you have been asked to reflect on these 16 matters is there any mention of any plan, is there? 17 A. No, sir. For the reasons I have outlined. 18 MR THOMAS: Sir, that is all I ask. 19 THE CHAIRMAN: Mr Weatherby? 20 MR WEATHERBY: Yes, just one very quick point from me. 21 Questions from MR WEATHERBY 22 MR WEATHERBY: I represent Mr Grainger's partner. 23 There is slightly different kit in each of the cars, 24 isn't there? 25 A. Yes, sir.</p> <p style="text-align: center;">Page 94</p>	<p>1 Q. Right. And is it a video camera? 2 A. I think within the items we have got, we have got video 3 cameras, we have got SLRs and we have got the digital 4 sort of point and shoot. 5 Q. Your recollection is you didn't in fact, even though it 6 says on the PowerPoint you should have had a camera, 7 your recollection is that you didn't? 8 A. I certainly don't recollect a camera being in my 9 vehicle, no, sir. 10 MR WEATHERBY: Thanks very much. 11 THE CHAIRMAN: Ms Collins. 12 MS COLLINS: No, thank you, sir. 13 THE CHAIRMAN: Yes, Mr Evans. 14 MR EVANS: Sir, just one matter, please. 15 Questions from MR EVANS 16 MR EVANS: H9, just in relation please to the time that you 17 were on duty on 3 March, no need to look at your 18 statement but in terms of the times that you deal with 19 there, the briefing starting at about 6.00 in the 20 morning on 3 March. 21 A. Yes, sir. 22 Q. You had attended the unit at about 4.30 that morning in 23 preparation for that briefing. Then you have told us 24 about events then that day and by about 6.15 that night 25 on 3 March, leaving Leigh police station.</p> <p style="text-align: center;">Page 96</p>

1 Just in terms of then what you did during the course
 2 of the day, once you arrived at Leigh police station,
 3 and before leaving then at about 6.15, just generally,
 4 how you occupied your time, please?
 5 **A. Yes, it would have been mixed between staying with the**
 6 **vehicle, being that I am the driver, so sometimes I will**
 7 **have that vehicle to myself, so I could rest within**
 8 **there.**
 9 **Other than that, I think there was a TV room.**
 10 **I would have definitely gone and got some refreshments**
 11 **I think from the supermarket round the corner, but in**
 12 **general just trying to sort of stay relaxed and rest as**
 13 **much as possible.**
 14 Q. In terms of that time remaining as it were on
 15 operational duty but awaiting any instruction to leave,
 16 was that usual, unusual or something in between?
 17 **A. A length of string, sir. It is not unusual for us to be**
 18 **waiting for a long, long time. Equally, we have**
 19 **conducted strikes within 10 minutes of leaving the unit,**
 20 **so completely sort of intelligence and subject led.**
 21 Q. Again thinking back, any impact at all therefore on your
 22 as it were operational readiness, either in terms of
 23 your own perception of your readiness or perhaps that of
 24 your colleagues?
 25 **A. I don't believe so, sir. I think everyone was rested**

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1 **and obviously at the point that we were moving forward**
 2 **there is a certainly a level of awake and adrenalin that**
 3 **goes with that.**
 4 MR EVANS: Thank you, nothing further.
 5 MR BEER: Just two things, please, things that I omitted to
 6 mention with your permission, sir, rather than things
 7 arising.
 8 THE CHAIRMAN: Of course.
 9 Further questions from MR BEER
 10 MR BEER: Were you briefed at all before the strike as to
 11 whether or not the subject vehicle had tinted rear
 12 windows?
 13 **A. I can't remember, sir.**
 14 Q. Were you briefed at all as to whether it was judged or
 15 known that the subject vehicle had locks on the doors
 16 that were anti-carjacking locks, do you know what I mean
 17 by that?
 18 **A. Yes.**
 19 Q. Ie even if the windows were down you cannot undo the
 20 doors?
 21 **A. The nature of you saying that it sounds so obscure that**
 22 **I don't think we would have discussed that, I think it**
 23 **would just be generally accepted.**
 24 Q. Generally accepted that it would have anti-carjacking?
 25 **A. Something that we would have come across and would not**

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1 **be so specific, to, you know, to make a real point of**
 2 **it.**
 3 Q. You would work on the assumption that you couldn't just
 4 go up and open the door?
 5 **A. Yes, sir, we have to plan for the worst case scenario,**
 6 **so.**
 7 Q. You see on the drills that we have seen on a video of
 8 the CSDC being deployed, the officers all deploy to
 9 a door and then in unison open the doors in
 10 a synchronised fashion. You would work on the basis
 11 that that would not be possible?
 12 **A. On that, yes, basis. Unless you could sort of get that**
 13 **visual control with everyone, it would be reliant on**
 14 **making sure you had two officers at each door and then**
 15 **working together to get that door open.**
 16 Q. How do you do that then? If subjects will not come out
 17 of the vehicle, how do you get them out?
 18 **A. The options for me would be if you are 100 per cent you**
 19 **have got control of those subjects through the window,**
 20 **you can ask them to open the door.**
 21 Q. Hmm.
 22 **A. Equally you can smash the window and facilitate entry**
 23 **yourself, so individuals will either have to come out of**
 24 **the wind or you can maybe reach in, because a lot of**
 25 **them I think once you use the handle from the inside, it**

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1 **will open the door.**
 2 MR BEER: Thank you very much.
 3 Questions from THE CHAIRMAN
 4 THE CHAIRMAN: Just one matter going back to something you
 5 dealt with at the beginning of your evidence, it is
 6 a general point. When you are looking at the OPUS
 7 system, is there a hyperlink system on it, in other
 8 words can you hover the mouse over a particular marker,
 9 for example, click on it and get taken to other
 10 material?
 11 **A. No, that would be something that --**
 12 THE CHAIRMAN: It would be very useful, would it?
 13 **A. -- I have always said it would assist. It has been**
 14 **a bugbear of and time consuming to try and find the**
 15 **relevance of that marker.**
 16 THE CHAIRMAN: Yes. Is there a hyperlink system at all on
 17 OPUS?
 18 **A. Yes, sir.**
 19 THE CHAIRMAN: There is, but it doesn't apply to markers?
 20 **A. No, sir.**
 21 THE CHAIRMAN: Thank you very much.
 22 Anything arising out of that?
 23 MR BEER: No thank you, sir.
 24 THE CHAIRMAN: Thank you very much for helping the Inquiry,
 25 H9. Your evidence is at an end and you are free to go.

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1 If you would just like to wait there, the usher will
 2 come round and escort you out by the secure route.
 3 **A. Thank you, sir.**
 4 **(The witness withdrew)**
 5 MR BEER: Sir, I wouldn't propose to move to the next
 6 witness now.
 7 THE CHAIRMAN: No, we will take an early break and perhaps
 8 start again at 1.55.
 9 MR BEER: Thank you very much, sir.
 10 THE CHAIRMAN: All right, thank you.
 11 (12.49 pm)
 12 (The Luncheon Adjournment)
 13 (2.00 pm)
 14 THE CHAIRMAN: Yes, Mr Beer.
 15 MR BEER: Sir, W4, who I think is already in the witness
 16 box.
 17 THE CHAIRMAN: Yes.
 18 W4 (sworn)
 19 THE CHAIRMAN: Thank you, W4.
 20 Would you remain standing please so that everyone
 21 who is entitled to can see you, it also makes it easier
 22 to hear you and you are likely to be referred to
 23 a number of files and you will need to be able to manage
 24 those and I think you will fine the little desk in front
 25 of you is necessary for that purpose. Thank you.

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1 Questions from MR BEER
 2 MR BEER: W4, my name is Jason Beer and I ask questions on
 3 behalf of the Inquiry. On your left-hand side there
 4 should be a cypher sheet. If you can refer to that when
 5 you refer to any of your colleagues amongst the AFOs.
 6 In the file in front of you, if you can turn up
 7 tab 1, please.
 8 Can you see in there a witness statement dated
 9 9 March 2012 in your name?
 10 **A. Yes.**
 11 Q. Then in tab 2, a witness statement of 22 May 2012?
 12 **A. Yes.**
 13 Q. Tab 3, a witness statement of 26 August 2014?
 14 **A. Yes.**
 15 Q. Then, tab 4, a witness statement of 12 September 2014?
 16 **A. Yes.**
 17 Q. Are the contents of those four witness statements true
 18 to the best of your knowledge and belief?
 19 **A. Yes.**
 20 Q. When did you join the police service?
 21 **A. I joined the police service in 1997, sir.**
 22 Q. Are you still serving?
 23 **A. I am, sir, yes.**
 24 Q. In March 2012 what was your rank?
 25 **A. I was a Police Constable, sir.**

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1 Q. Does that remain the case?
 2 **A. Yes, sir.**
 3 Q. What role were you performing in March 2012?
 4 **A. I was an SFO within the Tactical Firearms Unit, sir.**
 5 Q. What is the difference between an SFO and AFO?
 6 **A. An AFO -- when you originally joined firearms you become**
 7 **an AFO, an authorised firearms officer, where you will**
 8 **deal with basic tactics. And then you progress by doing**
 9 **courses to become an SFO and then eventually on to**
 10 **a CTSFO, sir.**
 11 Q. When did you first become an AFO?
 12 **A. I first became an AFO, sir, in 2002.**
 13 Q. When did you become an SFO?
 14 **A. I became an SFO in 2004, sir.**
 15 Q. Were you trained to conduct a MASTS operation?
 16 **A. Yes, sir.**
 17 Q. Do you remember when you first qualified to do that?
 18 **A. I believe it was beginning of 2005, sir.**
 19 Q. Did you undertake periodic refresher training in MASTS
 20 operations --
 21 **A. Yes, sir.**
 22 Q. -- up until and including March 2012?
 23 **A. Yes, sir.**
 24 Q. Are you familiar within the context of MASTS operations
 25 of the terminology, a "conventional" and

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1 an "unconventional" strike --
 2 **A. I am, sir, yes.**
 3 Q. -- on a vehicle?
 4 **A. Yes, sir.**
 5 Q. Can you tell us what the conventional strike or strikes
 6 were, please?
 7 **A. A conventional strike, sir, would be where a vehicle is**
 8 **on a road, we would wait for it to come to a natural**
 9 **stop, maybe a set traffic lights, roundabout, a queue of**
 10 **traffic and then the decision would be made to either do**
 11 **a nearside or an offside strike where possible.**
 12 Q. Why was it conventional?
 13 **A. Because that is the type of strike we tended to do**
 14 **mainly.**
 15 Q. Was it because that was the type of strike that was
 16 preferred?
 17 **A. Yes, sir, if possible.**
 18 Q. Why was it preferred?
 19 **A. It was easier to control, I would say, sir, you could**
 20 **choose the moment when you conducted the strike, as**
 21 **such. If it wasn't, if you were approaching a set of**
 22 **lights and it wasn't on then the team would be able to**
 23 **back off and wait until it was an appropriate time, sir.**
 24 Q. What about unconventional strikes on vehicles, what did
 25 they tend to consist of?

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1 **A. Unconventional, sir, would be anything that is not on**
 2 **the roads, so a car park or open space or a garage**
 3 **block, something like that, where we wouldn't have the**
 4 **normal thing of traffic lights and roundabouts, sir.**
 5 Q. Did you practise unconventional strikes?
 6 **A. Yes, sir.**
 7 Q. Frequently?
 8 **A. Yes, sir. Every time we trained.**
 9 Q. Did that include strikes on cars that were parked in,
 10 for example, a car park?
 11 **A. Yes, sir. During the training we placed cars into**
 12 **different areas of car parks or set it up as though we**
 13 **were doing that to test the different types of strikes**
 14 **that we would be able to make, sir.**
 15 Q. By March 2012 was there a conventional way of conducting
 16 an unconventional strike on a car in a car park?
 17 **A. No, sir. You would have to deal with whatever was there**
 18 **at the time, sir.**
 19 Q. Was there a preferred way in which it was done?
 20 **A. It would all depend on where that car was parked, sir,**
 21 **if it was in the centre of the car park, then yes you**
 22 **could possibly set it up so the alpha car would go**
 23 **slightly past and the bravo car would turn in. That**
 24 **would be one option.**
 25 **However, if it is parked at either end that is not**

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1 **an option and also if it is parked in the middle with**
 2 **other cars around it, say to the front or to the rear,**
 3 **then again you would have to adjust where the team went.**
 4 Q. You said that conventional strikes were preferred
 5 because of the control you could exert over the subject
 6 vehicle.
 7 **A. Yes, sir, because the team would be able to see the**
 8 **vehicle quite clearly as they were coming up behind it.**
 9 **Normally it is done from behind, the majority of times,**
 10 **you would have a picture paint from the surveillance and**
 11 **you would be able to sort of see the vehicle normally as**
 12 **you were coming in to do the strike.**
 13 Q. What were the dangers or risks associated with the less
 14 preferred option of an unconventional strike then?
 15 **A. There's risks associated with all those strikes, sir --**
 16 Q. I understand that.
 17 **A. It is changing factors, at the time of the strike it may**
 18 **well be that something unforeseen like a barrier or**
 19 **a member of the public or another vehicle, that is just**
 20 **something you would have to deal with there and then,**
 21 **sir.**
 22 Q. There are as many variables on the road though, are
 23 there not? If not more?
 24 **A. There are, sir, however you could then look at a map and**
 25 **see that there is a set of traffic lights coming up and**

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1 **see whether or not that would be suitable, so you would**
 2 **have the map readers in the back who would be**
 3 **continually reading the road ahead to see if there was**
 4 **going to be a suitable location.**
 5 Q. As an outsider, it seems that there are more dangers
 6 when a vehicle is on the road and the engine is running
 7 and there are members of the public around in other
 8 vehicles, than in, for example, the quiet or privacy of
 9 a car park. Why is my impression wrong?
 10 **A. I am not saying your impression is wrong, sir, as**
 11 **an outsider in relation to that tactic. However it was**
 12 **the preferred option, it was to do with the control**
 13 **being able to come up behind a vehicle and being able to**
 14 **read the roads ahead to choose an ideal location, rather**
 15 **than an unconventional where you may drive on and not**
 16 **actually know where the subject vehicle was or something**
 17 **could happen very quickly on say a car park where you**
 18 **had to change a tactic.**
 19 Q. I will move on.
 20 Were you trained in the use of specialist munitions?
 21 **A. I was, sir yes.**
 22 Q. Which of those, please?
 23 **A. Shotgun, RIP round, RAM round and the CSDS dispersal**
 24 **canister, sir.**
 25 Q. How frequently up till March 2012 had you been deployed

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1 on MASTS operations?
 2 **A. How many times I deployed on MASTS operations?**
 3 Q. Yes.
 4 **A. Dozens of times, sir.**
 5 Q. Of those dozens of occasions, what proportion had
 6 resulted in some direct action being taken against
 7 a subject or subject vehicle?
 8 **A. I would say somewhere between 45 and 55, sir, actual**
 9 **interventions, and many times that we deployed where we**
 10 **didn't actually carry out any intervention or didn't**
 11 **actually leave the unit.**
 12 Q. What frequency of those involved the use of special
 13 munitions?
 14 **A. I would say probably three-quarters of those, sir, the**
 15 **authority would be granted for the special munitions but**
 16 **they wouldn't always be deployed.**
 17 Q. Three-quarters of those authority had been granted or
 18 three-quarters of those they were used?
 19 **A. Three-quarters authority had been granted, sir. Actual**
 20 **in relation to how many times it had been used,**
 21 **I couldn't say, sir. It is an individual's**
 22 **responsibility as to whether or not they deployed those**
 23 **specialist munitions.**
 24 Q. You by this time I don't think had undertaken the CTSFO
 25 training; is that right?

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<p>1 A. By 2012? 2 Q. Yes. 3 A. I had sir, yes. 4 Q. When had you done the CTSFO? 5 A. I believe it was 2011, sir, on run up to the Olympics. 6 Q. Were you taught any different tactics in the CTSFO in 7 relation to MASTS than you had been in Greater 8 Manchester Police? 9 A. Yes, sir. We were taught what was then known as the 10 Metropolitan way of doing things, it is now currently 11 known as the national tactic, which would involve three 12 vehicles positioned slightly differently in relation to 13 a conventional strike, and sometimes it would be -- the 14 bravo vehicle would be very close sometimes that space 15 and the alpha vehicle putting cover on as well, sir. 16 Q. The chairman has heard some evidence that the 17 Metropolitan Police, on MASTS, trained with the use of 18 an officer remaining in a vehicle and providing static 19 cover. 20 A. Yes, sir. 21 Q. Was that something -- sorry, and has heard evidence, 22 that that was not trained within GMP at this time 23 in March 2012. 24 A. It wasn't part of their training programme, sir, no. 25 But for the CTSFOs, it was, sir.</p> <p style="text-align: center;">Page 109</p>	<p>1 you any previous knowledge of Anthony Grainger? 2 A. Yes, sir. He had featured previously, from 3 recollection, in one operation that had been mentioned. 4 Q. Which operation had been mentioned? 5 A. I believe it was Operation Blythe, sir. 6 Q. Who had it been mentioned by and to whom was it 7 mentioned? 8 A. It was an operation, sir, that the team was involved in, 9 although we didn't actually deploy -- 10 Q. Which team? 11 A. The firearms operations team, where we gave some 12 protection to surveillance I believe it was, sir. 13 Q. Were you on that team? 14 A. I was, sir, yes. But we didn't actually deploy as 15 a Firearms Unit in relation to do firearms tactics. 16 Q. When you came to be briefed in March 2012, did you 17 remember back to Operation Blythe -- 18 A. I didn't, sir, no. 19 Q. -- in 2008? 20 A. No, sir. 21 Q. It is only as a result of subsequent events that you 22 have made the link between Operation Blythe and 23 Mr Grainger? 24 A. Yes, sir. 25 Q. That didn't play any part in your thinking on 3 March?</p> <p style="text-align: center;">Page 111</p>
<p>1 Q. What do you mean for the CTSFOs it was? 2 A. All the officers who had been to London doing the 3 pre-Olympics training, sir, doing the MASTS training, we 4 were taught that tactic, sir. 5 Q. Were you taught to use it whenever you wanted to, even 6 if you were acting alongside officers who were not CTSFO 7 trained? 8 A. I can't recall, sir. I can't recall whether we were or 9 we weren't. 10 Q. What do you think? 11 A. I believe myself, sir, that yes, we would employ that 12 tactic. 13 Q. Even though some other people that you were sitting 14 alongside were not trained in it? 15 A. In relation to the cover role, sir, yes. 16 Q. Why do you think that you were allowed or permitted to 17 do it that way? 18 A. I don't remember being told that we weren't, sir. It 19 was a tactic that we had been taught and so we were now 20 trained in it. 21 Q. So it was because you weren't told that you were not 22 allowed to you thought that you were? 23 A. Not that I recall, sir. 24 Q. Okay. 25 Before you became involved in Operation Shire, had</p> <p style="text-align: center;">Page 110</p>	<p>1 A. No, sir. 2 Q. Okay. The same question in relation to Mr Rimmer. Had 3 you, before Operation Shire started, any knowledge of 4 him? 5 A. Not that I am aware of, sir, no. 6 Q. What about Mr Totton, David Totton? 7 A. Yes, sir, I knew who David Totton was. 8 Q. Who was he? 9 A. He was a fairly well known member of a Salford OCG, sir. 10 Q. "Fairly well known", meaning what? 11 A. His name was mentioned a lot of times, sometimes just in 12 discussions but his name cropped up a fair bit in 13 relation to Salford OCGs. 14 Q. His name cropped up quite a bit in relation to Salford 15 OCGs? 16 A. Yes, sir, and also the Brass Handles shooting as well, 17 sir. 18 Q. Where he was the intended victim of an assassination 19 attempt? 20 A. Yes, sir. 21 Q. When was your first involvement in Operation Shire? 22 A. I would have to look at my statement for that, sir, the 23 first date that I was deployed on it. 24 Q. Do you remember that now or not? 25 A. Not now, sir, no.</p> <p style="text-align: center;">Page 112</p>

1 Q. If you look at tab 2 of the bundle, please, and look at
 2 the second page, this is your second statement. If you
 3 look at the second paragraph from the bottom.
 4 **A. Yes, sir.**
 5 Q. You said that you had also been deployed in relation to
 6 Op Shire on 8, 14, 15, and 21 December as well as
 7 6 February.
 8 **A. Yes, sir.**
 9 Q. Yes?
 10 **A. Yes, sir.**
 11 Q. I think also 2 February; is that right?
 12 **A. Yes, sir.**
 13 Q. Which I think has been missed out there. From where did
 14 you get those dates?
 15 **A. Those dates were, I believe, from recollection now,
 16 I can't remember, sir. I was given those dates that
 17 those were the dates I was deployed to that operation,
 18 sir.**
 19 Q. Who were you given them by?
 20 **A. I don't recall, sir.**
 21 Q. Did you consult any documents to obtain them?
 22 **A. I may well have looked at the deployments themselves,
 23 sir.**
 24 Q. When you say looked at the deployments, do you mean
 25 looked at the PowerPoint briefings to see whether you

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1 were mentioned?
 2 **A. If there was available, sir, yes, I may have looked at
 3 those.**
 4 Q. To what extent was that usual or unusual, to be deployed
 5 on an occasion on many occasions over the course of
 6 weeks and months?
 7 **A. It was very usual, sir, sometimes some operations would
 8 run for weeks and weeks.**
 9 Q. What approach did you take to the treatment of
 10 intelligence that you had been given, for example early
 11 in the life of an operation, here maybe on 8, 14 and
 12 15 December, when you came to be deployed later?
 13 **A. The intelligence, sir? The intelligence could always
 14 change, sir, so it would be dependent on whatever
 15 briefing was on that day, that would be the intelligence
 16 that I would take, sir.**
 17 Q. You would act on and only on the intelligence you were
 18 given on that day?
 19 **A. Yes, sir.**
 20 Q. Was it usual for AFOs to be given some form of grading
 21 of the intelligence on which they were required to take
 22 life and death decisions?
 23 **A. Not that I recall, sir, although some TFCs may well have
 24 given that.**
 25 Q. In your vast experience as an AFO, were you given such

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1 grading?
 2 **A. Not that I recall, sir.**
 3 Q. You were being required, as I have said, sometimes to
 4 take life and death decisions. How did you treat the
 5 words that were read out to you?
 6 **A. In relation to intelligence, sir?**
 7 Q. In the briefing.
 8 **A. I took it that that was the correct up-to-date
 9 intelligence, sir.**
 10 Q. What do you mean you took it that it was correct -- you
 11 took it that it was all gospel, it was all true?
 12 **A. Yes, sir.**
 13 Q. And what, established fact?
 14 **A. Yes, sir.**
 15 Q. Yes?
 16 Even though you knew some or all of it was "only
 17 intelligence"?
 18 **A. Yes, sir. I would take it that the intelligence we were
 19 receiving on the briefing was up to date and graded
 20 intelligence, sir.**
 21 Q. Were words ever used to convey to you the strength of
 22 belief in the intelligence? You know:
 23 "We have got some uncorroborated intelligence ...
 24 "We have got a single source ...
 25 "We have got weak intelligence ...

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1 "We have got reliable intelligence ...
 2 "We have got good intelligence ...
 3 "We have got strong intelligence ...
 4 "We have got excellent intelligence ..."
 5 To make up for the lack of grading?
 6 **A. Again, sir, that would depend on the TFC themselves.
 7 Some TFCs would do that some TFCs wouldn't, sir.**
 8 Q. So it is just a question of which TFC you drew on the
 9 day as to whether or not they --
 10 **A. Their style of briefing, yes, sir.**
 11 Q. -- gave you some information on the reliability of the
 12 intelligence?
 13 **A. Yes, sir.**
 14 Q. How did you cope with that or did you just get on with
 15 it? You took what you were given?
 16 **A. I just took what was given, sir, and got on with my job.**
 17 Q. Did anyone ever say:
 18 "Hold on, this is a bit variable, I am being given
 19 a gun, or guns [many guns here] and being asked to go
 20 out onto the streets of Greater Manchester and use what
 21 I am being told in the course of a briefing. One day
 22 somebody will give me quite a bit of information about
 23 how reliable this intelligence is, and the next day,
 24 just because it is a different TFC, they don't."
 25 **A. I never questioned it, no, sir.**

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<p>1 Q. On 1 March, that is the Thursday, do you remember doing 2 anything particular in relation to Operation Shire? 3 A. Yes, sir. I remember going to the Culcheth area with 4 X7, I also believe that H9 and U2 were also there as 5 well, sir. And we went to look up at the area of 6 Culcheth under the direction of X7. 7 Q. That was the four of you that went? 8 A. As far as I recall, sir, yes. 9 Q. Do you know why it was the four of you? 10 A. I don't know why it was the four of us, sir, other than 11 there was a request for us to go up there. I knew I was 12 going to be driving the alpha vehicle at that point, 13 sir, so it is always good for the alpha driver to have 14 a look at the area when leading the convoy vehicles in. 15 Q. X7 has given a statement to the Inquiry that said that 16 this was about 11.00 on the Thursday morning, does that 17 sound about right? 18 A. About right, sir, yes. 19 Q. That he and the other three of you went to the Culcheth 20 area to familiarise yourselves with the area and to 21 reconnoitre a number of financial institutions. Does 22 that sound about right? 23 A. Yes, sir. 24 Q. Do you know why you were looking at financial 25 institutions?</p> <p style="text-align: center;">Page 117</p>	<p>1 of Sainsbury's, and there was some mention of a cash 2 office, I suppose you would say, at Sainsbury's and 3 other officers had gone to look at other premises around 4 the area. 5 Q. Where was the cash office? 6 A. I am not aware, sir. I didn't actually go in there. 7 Q. Did you play any part in the writing of the PowerPoint 8 presentation for 2 March, the one that was briefed out 9 at about 1.00 am on the Friday morning? 10 A. Not to my recollection, sir. 11 Q. I think you were present at that briefing. 12 A. Yes, sir. 13 Q. I wonder whether we could look at the general firearms 14 bundle, number 2, please and look at tab 20, please. 15 I think we can see on the second page, 448, that you 16 were due to be there, yes? Your name is mentioned, 17 third down. 18 A. Yes, sir. 19 Q. Then if you look at tab 21, you are mentioned after X7, 20 ten lines in. 21 A. Yes, sir. 22 Q. So you were actually present. 23 Can we in the PowerPoint, tab 20, please, look first 24 at page 463. 25 A. Yes, sir.</p> <p style="text-align: center;">Page 119</p>
<p>1 A. Because we believed that it was going to be an armed 2 robbery in that area, sir. 3 Q. Did you believe it was to be of financial institutions? 4 A. Yes, sir. 5 Q. What did you do when you got there? 6 A. We split up, I know I myself went to sort of a precinct 7 area where there was an upstairs and I went upstairs and 8 had a look round there to see if there was any business 9 premises or what I would call targets. 10 Q. You were looking for business premises or things that 11 you would call targets? 12 A. Things like banks, Post Offices, things like that, sir. 13 Q. Was there anything upstairs that you found? 14 A. There was nothing upstairs, sir, although I was aware 15 that there was premises downstairs. 16 Q. Was that Culcheth Parade? 17 A. Yes, sir. 18 Q. Were any photographs taken in the course of the recce? 19 A. I don't recall, sir. 20 Q. Did you all meet up again and then travel back to the 21 firearms complex? 22 A. We will have done so, sir, yes. 23 Q. Can you recall anything else that happened in the course 24 of that visit? 25 A. I know that we looked at Sainsbury's, sir, and the rear</p> <p style="text-align: center;">Page 118</p>	<p>1 Q. The foot interception slide, is that a contingency that 2 is sometimes planned for? 3 A. It is part of the platform, sir. 4 Q. Yes. 5 Can you see the next two pages, 464 and 465. 6 A. Yes, sir. 7 Q. Do those two pages, to your knowledge, relate to the 8 foot interception slide? 9 A. Yes, sir, in relation to possibly people going towards 10 those premises on foot. 11 Q. When you say people, which people? 12 A. The offenders. 13 Q. Subjects not police officers? 14 A. Yes, sir. 15 Q. The slides behind 464 and 465 are about foot 16 interceptions; is that right? 17 A. Yes, sir. 18 Q. Right. Then on to 466, and you see 466, there is 19 a header slide "Direct contact". 20 A. Yes, sir. 21 Q. The pages between 467 and 470, are they concerned with 22 the "Direct contact" heading? 23 A. Just give me those numbers again, please, sir? 24 Q. The header slide at 466, is that the introduction to the 25 slides at 467 to 470?</p> <p style="text-align: center;">Page 120</p>

<p>1 A. Yes, sir. 2 Q. Just tell the chairman what "Direct contact" is? 3 A. A direct contact, sir, is where you contained a premises 4 where you believe that a known offender is and you will 5 either do a knock and call out, sir, where your -- 6 Q. Sorry, say that again? 7 A. A knock and call out, they call it, sir, where you call 8 out any subjects and that can also lead on to a limited 9 entry, if you don't get any response, where you have to 10 do an entry, sir, in relation to search of people. 11 Q. Can you recall when you were attending the scene on the 12 recce whether you identified any of those eight 13 premises? 14 A. I can't, sir, no. 15 Q. Do you know how they were identified? 16 A. I don't, sir, no. 17 Q. Okay. 18 Can you recall when you were attending on 1 March, 19 and then into the briefing on 2 March, can you recall 20 whether you were working on the basis, as a result, for 21 example, of what X7 told you, that the subjects intended 22 to break into premises? 23 A. That had been mentioned, sir. 24 Q. And to lay in wait? 25 A. That had been mentioned, sir.</p> <p style="text-align: center;">Page 121</p>	<p>1 A. Yes, sir. 2 Q. Then over the page at 1180 he says a very similar thing 3 in the second paragraph: 4 "While we are on the subjects, our intention is to 5 conduct an interception prior to any offence taking 6 place, which is before we get to Culcheth." 7 Yes? 8 A. Yes, sir. 9 Q. That is consistent with what you have just said about 10 the idea of preventing the subjects from getting to 11 Culcheth, that was the working hypothesis? 12 A. Yes, sir. 13 Q. Was it thought that they might try and break in at night 14 time and lay in wait? 15 A. I don't recall, sir. 16 Q. Just go back to 1176, please, can you see the big box, 17 the first paragraph in the big box -- 18 A. Yes, sir. 19 Q. -- about five lines in, X7 says: 20 "Now, there is intelligence to suggest that these 21 subjects were responsible [sorry, I think this is 22 Mr Lawler] for a robbery in 2008 in Kirkham in Preston, 23 where they broke into a bank and lay in wait for staff 24 to arrive. Again, a point in that, they broke in around 25 just after 3.00 in the morning, which is the reason why</p> <p style="text-align: center;">Page 123</p>
<p>1 Q. And that, as a consequence of that, the plan was to try 2 and prevent the subjects from getting into Culcheth and 3 therefore prevent them getting into buildings? 4 A. Yes, sir. 5 Q. Was that the working hypothesis? 6 A. I believe so, sir. 7 Can I just point out one thing as well, sir? 8 Q. Yes. 9 A. It was not just in relation to premises, it was also in 10 relation to any cash in transit that went into that area 11 as well. 12 Q. I was coming to that in a moment. 13 If you look at tab 21, please. 14 A. Yes, sir. 15 Q. At page 1179. 16 A. Yes, sir. 17 Q. Can you see the large paragraph in the box? 18 A. Yes, sir. 19 Q. This is what I think X7 is saying in the course of the 20 briefing, about eight lines into the second paragraph he 21 says: 22 "The reason we are at Leigh police station is 23 obviously to intercept the subjects prior to them 24 getting to Culcheth." 25 Yes?</p> <p style="text-align: center;">Page 122</p>	<p>1 we are here at this time today." 2 A. Yes, sir. 3 Q. You were being briefed at 1.00 in the morning, you had 4 been asked to come on in the really early hours? 5 A. Yes, sir. 6 Q. Does that help jog your memory, that you were being 7 briefed up very late at night, early in the morning? 8 A. Yes, sir, if that is what the TFC has given to us, then, 9 yes, sir, that is what I take it the briefing was in 10 relation to. 11 Q. Can you think back now to comparing and contrasting that 12 with the following day's briefing, 3 March, whether that 13 was still the working hypothesis, the plan? 14 A. I believe that was still there in the background, sir, 15 but there was also other -- the other premises that had 16 come into play as well, sir. 17 Q. What were the other premises that had come into play? 18 A. So in relation to banks or anywhere where cash 19 deliveries could take place. 20 Q. I think the briefings in terms of the PowerPoints were 21 exactly the same for both days? 22 A. Yes, sir. 23 Q. They had both the eight premises listed in numbered 24 order and then the eight premises identified on the 25 aerial photograph in the same way?</p> <p style="text-align: center;">Page 124</p>

1 **A. Yes, sir.**
 2 Q. What do you mean on the second occasion, on 3 March,
 3 other premises had come into play?
 4 **A. In relation to the first briefing, sir, because of the**
 5 **time we were there, my belief at the time was we were**
 6 **there because they thought they may break into somewhere**
 7 **to wait for some staff.**
 8 **However, on the second time that we deployed, it was**
 9 **in relation to other premises still being open and open**
 10 **for business, sir.**
 11 Q. Was that briefed up to you on the morning of the 3rd?
 12 **A. No, sir.**
 13 Q. Looking at this briefing on the 2nd, please, can you see
 14 on page 1181.
 15 **A. Yes, sir.**
 16 Q. This is X7 speaking, the first main paragraph, the last
 17 five or so lines, he says:
 18 "It may be appropriate that they are getting on to
 19 the plot, so if that is the case and we can't get close
 20 to them, we will let them deploy. As it stands there is
 21 no threat to any individuals as far as we are aware, so
 22 we may well be the safest option is to let them deploy
 23 on foot and we will conduct any strike there."
 24 Yes?
 25 **A. Yes, sir.**

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1 Q. What do you understand X7 to be saying there?
 2 **A. Basically that if they got within the Culcheth area,**
 3 **prior to any strike taking place and they got to**
 4 **a premises that they would let them go on to the**
 5 **premises prior to putting in any strike, sir.**
 6 Q. Why would that be, in his words, "It may well be the
 7 safest option to let them get out of their vehicle"?
 8 **A. Because then you could do a foot strike, sir.**
 9 Q. Why would that be, may well be safer than doing a strike
 10 on a car?
 11 **A. I don't know, sir, you would have to ask him that.**
 12 Q. Would you agree that it would be safer to let subjects
 13 get out of a car than conduct a strike on the car?
 14 **A. I would prefer to do a strike on the car, sir.**
 15 Q. Why would you prefer to do a strike on a car?
 16 **A. Because then the subjects are contained within the**
 17 **vehicle, sir. You have got nobody on foot who can run**
 18 **and also in relation to a foot strike you would need**
 19 **more resources there and then on the ground or on foot.**
 20 Q. Can you think of other advantages of a strike on a car
 21 over what X7 appears to be saying may well be the safest
 22 option, which is to let them get out?
 23 **A. Yes, sir, because if you are in the vehicle, as**
 24 **I alluded to before, you could always control where the**
 25 **strike took place and you can also hopefully interdict**

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1 **prior to them getting into what we would call the target**
 2 **area.**
 3 Q. This is talking about if it has gone beyond that, if
 4 they have got into, in this example, Culcheth and are on
 5 the plot.
 6 What about the other way round. Disadvantages of
 7 a strike on a parked vehicle for example over letting
 8 them get out?
 9 **A. There are disadvantages and advantages, sir, with both**
 10 **tactics, it depends on the topography of the land, how**
 11 **many subjects you have got, where the vehicle may be**
 12 **parked, whether out on foot, there are a lot of**
 13 **different scenarios that you could run through that,**
 14 **sir.**
 15 Q. Lots of variables?
 16 **A. Yes, sir.**
 17 Q. But in principle, what are the disadvantages?
 18 **A. In relation to a MASTS, sir? In relation to a MASTS**
 19 **strike itself?**
 20 Q. No, the disadvantages in relation to striking on
 21 a vehicle, a parked-up vehicle where you think the
 22 subjects may be getting out --
 23 **A. Disadvantages, sir, it is a vehicle that can be used as**
 24 **a weapon, so you would have to make sure that the block**
 25 **was placed securely on that vehicle.**

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1 Q. Yes.
 2 **A. Also if they tried to break out in a vehicle, you may**
 3 **have members of the public in that area and then you**
 4 **have got vehicles that are colliding with each other,**
 5 **I would say that is a disadvantage, sir.**
 6 Q. Anything else you can think of?
 7 **A. Not at the moment, sir, no.**
 8 Q. Again, as an outsider, one thing that we have heard
 9 quite a lot about is that AFOs would quite like to see,
 10 very much like to see, the hands of their subjects.
 11 **A. Yes, sir.**
 12 Q. Because presumably those are the things that can hold
 13 weapons or discharge weapons?
 14 **A. It is the main thing you are taught as an AFO, sir.**
 15 Q. Yes.
 16 In a vehicle, it is quite hard to see the subjects'
 17 hands, isn't it?
 18 **A. Depending where the hands are, yes, sir.**
 19 Q. Is that a factor that you would take into account?
 20 **A. Not really, sir, no.**
 21 Q. Why not?
 22 **A. It is not something I have ever thought about, sir, in**
 23 **relation to a MASTS strike itself because the verbal**
 24 **challenges and domination, you would expect to see the**
 25 **hands, sir.**

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<p>1 Q. It is not something that you have ever thought about, 2 has it ever been the subject of training or discussion? 3 A. It has been the subject of training and discussion, sir, 4 in relation to you would want to shout "Show me your 5 hands, show me your hands", because you would want to 6 see the hands, sir, but not in relation to the hands not 7 being there, sir, no. 8 Q. Just the general difficulties that strikes on vehicles 9 may cause, has that been the subject of detailed 10 discussion in the course of your training or your -- 11 A. It has never been anything that is a detailed 12 discussion, sir, because as an AFO you would be shouting 13 "Show me your hands, show me your hands", so you would 14 expect to see the hands, sir. 15 Q. The reason for asking is that over the past decade in 16 England and Wales there have been quite a few reports 17 about members of the public who have been killed by 18 police officers -- 19 A. Yes, sir. 20 Q. -- in vehicles, and the difficulties that conducting 21 strikes on members of the public in police vehicles when 22 they are in a vehicle cause, and one of the recurring 23 features has been the thing that I have just mentioned? 24 A. Yes, sir. 25 Q. That hasn't filtered down to you on the ground?</p> <p style="text-align: center;">Page 129</p>	<p>1 else? 2 A. I can't recall, sir, I just remember saying that 3 I wanted to make a statement. 4 Q. Why did you want to make a statement? 5 A. The time that had elapsed, sir, I would have expected to 6 have done it within three or four days maximum and it 7 was getting -- well, six days, sir. 8 Q. What was the response back? 9 A. That we were going to do a statement on the Friday, at 10 Nexus House. I believe there had been a request for 11 video interview by the -- I believe by the IPCC, but 12 that that was going to be delayed for some while 13 further. 14 Q. Do you remember attending a meeting on 8 March, the 15 Thursday, with the Police Firearms Officers' 16 Association? 17 A. Yes, sir. 18 Q. Can you recall, other than AFOs from GMP, who attended 19 that? 20 A. I believe there was a Mr Williams, who was from the 21 PFOA, V53 and there was one other gentleman there 22 I believe it was from the PFOA, but I don't recall who 23 that was now. 24 Q. What happened at the meeting? 25 A. It was a meeting about the PFOA, what they could do for</p> <p style="text-align: center;">Page 131</p>
<p>1 A. It is not something I would overly think about, sir, no. 2 Q. Okay. 3 In any event on 2 March, you, although deployed, 4 were not called into action? 5 A. That's correct, sir. 6 Q. You stayed laid up and were discharged from the duty 7 early in the morning? 8 A. Yes, sir. 9 Q. You were called back on on the morning of the 3rd; is 10 that right? 11 A. Yes, sir. 12 Q. You subsequently gave a written account of the events of 13 the 3rd -- 14 A. Yes, sir. 15 Q. -- on 9 March? 16 A. Yes, sir. 17 Q. Can you tell us what accounted for the delay in 18 providing the account? 19 A. I can't tell you what provided the delay, sir. I know 20 I was getting frustrated and voiced my opinion that 21 I wished to make an account, sir. 22 Q. Who did you voice your opinion to? 23 A. Supervision. 24 Q. Was that supervision in the operations division, the 25 firearms operation team or was it to PSD or somebody</p> <p style="text-align: center;">Page 130</p>	<p>1 you as a firearms officer, what support they could 2 provide, what support they could provide for your 3 families, et cetera, it was along those lines. 4 Q. Was there any discussion about what had happened in the 5 post-incident procedure? 6 A. Not that I recall, sir. 7 Q. Was there any discussion about you having not provided 8 a statement? 9 A. Not that I recall, sir. 10 Q. Did anyone express to the PFOA their frustration at not 11 having provided a fourth stage account? 12 A. I don't recall, sir. 13 Q. What did V53 say? 14 A. He basically mentioned about how the PFOA had helped 15 him, helped his family. 16 Q. Was that it? 17 A. That I recall, sir, yes. 18 Q. Was it as a result of that meeting on the 8th that you 19 then made witness statements on the 9th? 20 A. I don't know, sir. 21 Q. Okay. In any event you came to make a statement on the 22 9th at Nexus House in conjunction with your colleagues? 23 A. Yes, sir. 24 Q. Do you recall there being a flip chart at the front of 25 the room or in the room --</p> <p style="text-align: center;">Page 132</p>

<p>1 A. Yes, sir.</p> <p>2 Q. -- on which information was displayed?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Was that information pre-recorded when you went in or</p> <p>5 was it written up as a result of the things that members</p> <p>6 of the team contributed?</p> <p>7 A. I don't recall, sir.</p> <p>8 Q. Thank you.</p> <p>9 Did you utilise the information on the flip chart?</p> <p>10 A. Yes, sir.</p> <p>11 Q. To your left-hand side on the judge's bench, that is it,</p> <p>12 got it, there should be I think a photocopy of the A1</p> <p>13 sheets of the flip chart. Did you use, taking this</p> <p>14 quickly, the tour of duty time of 4.30 in your statement</p> <p>15 of 9 March?</p> <p>16 A. As the official tour of duty, sir, yes.</p> <p>17 Q. Yes. Does that mean that you in fact arrived earlier</p> <p>18 than that?</p> <p>19 A. I will have arrived earlier, sir, yes.</p> <p>20 Q. Did you use the time of 06.00 hours for the time that</p> <p>21 you attended the briefing?</p> <p>22 A. I believe so, sir, yes.</p> <p>23 Q. Did you use the registration of vehicle that we see on</p> <p>24 the second page? The LO --</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 133</p>	<p>1 the flip chart?</p> <p>2 A. I believe so, sir, yes.</p> <p>3 Q. What other times were there that you obtained from other</p> <p>4 officers?</p> <p>5 A. Just those, sir, I believe.</p> <p>6 Q. You say that you clarified vehicles with, amongst</p> <p>7 others, those five officers -- or amongst those five</p> <p>8 officers, which vehicles did you clarify matters with,</p> <p>9 from those five?</p> <p>10 A. I don't recall, sir.</p> <p>11 Q. I am not sure there are any other vehicles mentioned</p> <p>12 other than the registration of the subject vehicle?</p> <p>13 A. It may well have been the subject vehicle then, sir.</p> <p>14 Q. But that was on the flip chart too?</p> <p>15 A. I believe so, sir.</p> <p>16 Q. Then you say you clarified matters relating to locations</p> <p>17 with the five officers. What locations did you --</p> <p>18 A. Road names, sir, so the name of the public house that we</p> <p>19 stopped on, the names of the roads, sort of leading into</p> <p>20 that area, sir.</p> <p>21 Q. Just the public house that you stopped on, I don't think</p> <p>22 you actually write down if you go back to page 2 of your</p> <p>23 witness statement, page 2 of your witness statement, two</p> <p>24 paragraphs from the bottom and one paragraph from the</p> <p>25 bottom.</p> <p style="text-align: center;">Page 135</p>
<p>1 Q. Did you use the time of 1815 hours on the first page as</p> <p>2 the time that you left Leigh police station?</p> <p>3 A. I believe so, sir, yes.</p> <p>4 Q. You didn't use the State Amber or State Red times?</p> <p>5 A. No, sir.</p> <p>6 Q. Why not?</p> <p>7 A. I couldn't be sure they were exact, sir. I wasn't too</p> <p>8 sure about that time, what times they were given, so</p> <p>9 I just didn't put them in, sir, as exact times.</p> <p>10 Q. Were you a bit uncomfortable about using times that</p> <p>11 somebody else had written up that you couldn't attest to</p> <p>12 yourself?</p> <p>13 A. In relation to the State Amber and the State Red, sir,</p> <p>14 yes.</p> <p>15 Q. You put at the end of your witness statement:</p> <p>16 "During the making of this statement I from time to</p> <p>17 time clarified with my colleagues matters relating to</p> <p>18 times, vehicles and locations. Those officers were X7,</p> <p>19 W9, U2, G11, Q9."</p> <p>20 Yes?</p> <p>21 A. Yes, sir.</p> <p>22 Q. What times did you clarify with those five officers?</p> <p>23 A. Things like arriving at Leigh police station, what time</p> <p>24 we left Leigh police station. Things like that, sir.</p> <p>25 Q. You got the time of leaving Leigh police station from</p> <p style="text-align: center;">Page 134</p>	<p>1 A. Yes, I have just put "public house", sir.</p> <p>2 Q. Hmm. What locations do you think you clarified with the</p> <p>3 other five?</p> <p>4 A. It will have been road names then, sir.</p> <p>5 Q. Did you speak to them about any other matters other than</p> <p>6 times, vehicles and locations?</p> <p>7 A. Not that I recall, sir.</p> <p>8 Q. Why not?</p> <p>9 A. Because I didn't need to, sir.</p> <p>10 Q. How were you arranged, how was it set out in the room?</p> <p>11 A. Quite a large open room, sir, I believe. From</p> <p>12 recollection it had computer banks and we were all sat</p> <p>13 by a computer while you were working on your statement,</p> <p>14 sir.</p> <p>15 Q. Were you in proximity to X7, W9, U2 and G11 and Q9, was</p> <p>16 it the way you were sat out?</p> <p>17 A. I don't recall, sir. I was in proximity to near enough</p> <p>18 all the officers, sir.</p> <p>19 Q. Okay.</p> <p>20 You attended the early morning briefing --</p> <p>21 A. Yes, sir.</p> <p>22 Q. -- on the 3rd. If we turn that up, please, in the</p> <p>23 general witness bundle, number 2. At tab 22, please,</p> <p>24 page 1267.</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 136</p>

1 Q. You are provided information that the subjects of the
 2 operation are believed to be engaged in armed robberies
 3 in the north-west region.
 4 How did you interpret the words "Engaged in armed
 5 robberies", in particular did you understand that to
 6 mean that the subjects would use and only use firearms
 7 or did you interpret "armed" more broadly as meaning any
 8 weapon?
 9 **A. "Armed" more broadly, sir.**
 10 Q. So not restricted to firearms?
 11 **A. Not restricted to firearms, sir, no.**
 12 Q. Similarly, over the page at 1268, 1269 and 1270 where
 13 the intent of each of the three subjects is given as
 14 conspiracy to commit armed robbery.
 15 **A. Yes, sir.**
 16 Q. Again, did you interpret "armed robbery" as meaning the
 17 same, any weapon? Not just a firearm?
 18 **A. Yes, sir.**
 19 Q. Okay.
 20 The second paragraph on 1267:
 21 "There is intelligence to suggest the subjects were
 22 responsible for a robbery in 2008 ..."
 23 Yes?
 24 **A. Yes, sir.**
 25 Q. Did you understand that the reference to "these

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1 subjects" meant that the three subjects that you were
 2 then briefed about were responsible for that robbery?
 3 **A. I believe so, sir, yes.**
 4 Q. Did you treat this as conviction information or not?
 5 **A. No, sir.**
 6 Q. Why not?
 7 **A. Because it just says "were responsible" rather than**
 8 **"were convicted of".**
 9 Q. Would you expect to be told if they had been convicted,
 10 if they had been?
 11 **A. Yes, sir, I would expect it to say, "Were convicted**
 12 **of ..."**
 13 Q. How do you treat a piece of intelligence like this,
 14 which doesn't give a grading under the National
 15 Intelligence Model and there aren't any words to
 16 describe how reliable it is? It just says, "There is
 17 some intelligence ..." How do you treat it?
 18 **A. As that, sir, you just take it as intelligence. It is**
 19 **just intelligence in relation to those people. If it**
 20 **doesn't say "were convicted of" then I can't take it as**
 21 **read. It is just intelligence on those subjects.**
 22 Q. Over the page, please, to 1268, you are given the first
 23 threat assessment of Mr Totton. Can you see that there
 24 are three warnings given?
 25 **A. Yes, sir.**

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1 Q. Firstly, what is your understanding of what a warning
 2 marker is?
 3 **A. My understanding is a warning marker is in relation to**
 4 **a police officer, what they should be aware of in**
 5 **relation to that person that they are dealing with, so**
 6 **it may be "DR", which is drugs, "FI", firearms.**
 7 Q. Are warning markers based on convictions or a broader
 8 range of matters?
 9 **A. I don't know, sir.**
 10 Q. When you would see this and hear this being read out,
 11 how would you treat it, as intelligence or convictions?
 12 **A. The way that is set out there, sir, I wouldn't know**
 13 **whether it was intelligence or convictions, sir. There**
 14 **is certainly the top one, possession of a shotgun in**
 15 **1999, I would expect that to be a conviction, sir.**
 16 Q. Just because of the way it is written?
 17 **A. Just the way it is written, sir, yes.**
 18 **And the second one, "Used an iron bar during**
 19 **a section 47 assault 2001". So it is "used iron bar",**
 20 **I would expect that to be a conviction as well, sir.**
 21 Q. I think certainly the first one you would have been
 22 wrong to treat it that way because it was not
 23 a conviction, but that's how you would have treated it
 24 because of the way it is written?
 25 **A. Yes, sir.**

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1 Q. What about the last one, violence?
 2 **A. Again, that he had at least been arrested for 10**
 3 **incidents of violence, sir.**
 4 Q. Over the page, by contrast, Mr Rimmer, I think you are
 5 told that he was convicted there, yes?
 6 **A. Yes, sir, because he has served five and a half years.**
 7 Q. Yes.
 8 Mr Grainger at 1270, how would you treat his weapons
 9 warning? As a conviction because of the way it is
 10 written or not?
 11 **A. No, sir, because it is written "Previously conspired to**
 12 **commit" rather than "used" or "had", it reads to me that**
 13 **is more intelligence related, sir.**
 14 Q. Okay.
 15 Violence, you are expressly told that he has had
 16 numerous arrests, yes?
 17 **A. Yes, sir.**
 18 Q. You wouldn't take from that he had been convicted of
 19 them?
 20 **A. No, sir, just that he had been arrested for them.**
 21 Q. Lastly, what do you understand a Group 1 offender to be?
 22 **A. A Group 1 offender to me, sir, is a serious and**
 23 **persistent offender. Someone who is involved in**
 24 **criminal activity on a persistent basis.**
 25 Q. Any criminal activity or of a specific type?

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1 **A. No, sir, more sort of high end crimes, it may well be**
 2 **armed robbery, violence, intimidation, things like that,**
 3 **sir.**
 4 Q. On the previous day's briefing, 2 March, Chief Inspector
 5 Lawler said words to the effect of, for speed I am
 6 summarising them, "There is no current intelligence that
 7 the subjects will be armed or have access to firearms,
 8 but given that the intelligence is that they plan to
 9 commit an armed robbery, and having regard to their
 10 background. I am working on the basis that they will be
 11 armed with firearms."
 12 Yes?
 13 **A. Yes, sir.**
 14 Q. Was that kind of statement of the current intelligence
 15 position about firearms a usual component of a briefing?
 16 **A. Again, that would depend on the TFC, sir, and their**
 17 **style. Different TFCs give different styles, they brief**
 18 **in different ways, sir. So that may well have been his**
 19 **style of doing the briefing, sir.**
 20 Q. As an AFO, putting myself in your position, I would
 21 regard that as pretty important information.
 22 **A. Yes, sir.**
 23 Q. Whether the men we are going to go up against are likely
 24 to have guns. And it really depended on the style of
 25 the man that was giving the briefing, whether you knew

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1 that or not?
 2 **A. I wouldn't be able to say for sure that them persons**
 3 **were going to have guns on them, sir, until I deployed**
 4 **onto a vehicle.**
 5 Q. Sorry, say again?
 6 **A. I wouldn't be able to tell whether them persons would**
 7 **have firearms with them, unless I was specifically told**
 8 **that somebody had a firearm with them, sir, until**
 9 **I actually deployed onto the vehicle itself.**
 10 Q. What, because you would want to see it?
 11 **A. Yes, sir. Or unless I was told specifically that they**
 12 **had a firearm with them, sir.**
 13 Q. I am not following what you are saying there.
 14 **A. In relation to what Mr Lawler has told us, sir, and you**
 15 **are saying he has taken it that because of their**
 16 **previous and et cetera, et cetera. I wouldn't take that**
 17 **as read that somebody had a firearm with them, I would**
 18 **expect if they had a firearm with them that I would be**
 19 **told specifically they had a firearm with them.**
 20 Q. Right.
 21 But it depended on the style or the personality
 22 involved as to whether or not such a briefing about the
 23 likelihood of them having firearms or not was given?
 24 **A. That would be down to the TFC, yes, yes.**
 25 Q. After you left this briefing, where there wasn't any

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1 such statement, either on the PowerPoint or verbally,
 2 what did you go away thinking?
 3 **A. In relation to which briefing, sorry, sir?**
 4 Q. 3 March.
 5 **A. 3 March.**
 6 Q. Yes, so Mr Lawler had given his assessment, "No current
 7 intelligence they have firearms ..."
 8 **A. Yes.**
 9 Q. "... we think they are going to commit an armed robbery.
 10 Looking at their backgrounds and working on that my
 11 assumption is that they will have guns."
 12 The next day, when Mr Granby is giving the briefing,
 13 there is none of that --
 14 **A. Yes, sir.**
 15 Q. -- what is set out is on these sheets of paper.
 16 What do you take to be the position when you leave
 17 the briefing room about the probability of them having
 18 firearms?
 19 **A. On the 3rd, sir?**
 20 Q. Yes.
 21 **A. If he hasn't give us any specific update or**
 22 **intelligence, sir, then nothing. If he has not told us**
 23 **that he believes that they are going to use firearms,**
 24 **then I can't say that that is going to be the case, sir.**
 25 Q. You went to Leigh police station --

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1 **A. Yes, sir.**
 2 Q. -- and stayed there for about, I don't know, 11 or so
 3 hours?
 4 **A. Yes, sir.**
 5 Q. What did you do in that time?
 6 **A. I slept sir, a lot. I do have a habit on these types of**
 7 **jobs, because I know they are going to be long and**
 8 **protracted, to get some sleep.**
 9 Q. I think you stay that in your statement, did you go in
 10 the car?
 11 **A. I stayed in the alpha vehicle, sir. On some occasions**
 12 **I went into the building to get some refreshments, to**
 13 **see if there were any updates, et cetera and then go**
 14 **back to the vehicle. I spent the majority of that day**
 15 **actually in the vehicle.**
 16 Q. You say in your witness statement that:
 17 "Throughout the day I received regular intelligence
 18 updates via the OFC."
 19 **A. Yes, sir.**
 20 Q. What intelligence updates did you receive?
 21 **A. Just whether there had been any vehicles in relation to**
 22 **the -- any sort of surveillance that had come out that**
 23 **was pertinent. I can't recall specifics but I know**
 24 **throughout the day he was giving us some stuff, sir.**
 25 Q. Was there anything further given to you on the issue of

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<p>1 whether or not the subjects might be armed?</p> <p>2 A. Not that I recall, sir.</p> <p>3 Q. Was there anything further given to you on whether or</p> <p>4 not the subjects intended to carry out a robbery or not?</p> <p>5 A. Not that I recall, sir.</p> <p>6 Q. Were you told that from about 5.30 pm onwards the</p> <p>7 command team knew that Mr Rimmer would not be in the</p> <p>8 Audi if it moved?</p> <p>9 A. I don't recall that, sir.</p> <p>10 Q. Would you have wanted to know that, that one of the</p> <p>11 three that you had been briefed about wouldn't be in the</p> <p>12 vehicle?</p> <p>13 A. I would like to have known that, sir, yes.</p> <p>14 Q. And why?</p> <p>15 A. Just because then I can refer back to the briefing and</p> <p>16 the person that was on the briefing, sir.</p> <p>17 Q. One of the three people you had been briefed about and</p> <p>18 had had a threat assessment about was not going to be</p> <p>19 there?</p> <p>20 A. Yes, sir.</p> <p>21 Q. The threat changes; is that right?</p> <p>22 A. You, then if you have still got three people, sir, you</p> <p>23 have then got an unknown. So it is an unknown threat,</p> <p>24 sir.</p> <p>25 Q. Thank you.</p> <p style="text-align: center;">Page 145</p>	<p>1 Q. What were your positions in the alpha vehicle, you were</p> <p>2 in the driver's seat?</p> <p>3 A. Yes, sir, I was alpha driver. Alpha 1 was X7.</p> <p>4 Q. Yes, so just tell us by seats at the moment, please.</p> <p>5 Nearside front passenger seat?</p> <p>6 A. Front passenger seat was X7.</p> <p>7 Q. Yes.</p> <p>8 A. Rear offside was Q9.</p> <p>9 Q. Yes.</p> <p>10 A. And rear nearside was W9.</p> <p>11 Q. At this point had you an idea of what the plan was?</p> <p>12 A. As we left Leigh police station?</p> <p>13 Q. Yes.</p> <p>14 A. No, sir, other than a possible intervention.</p> <p>15 Q. You say in your statement:</p> <p>16 "Upon reaching the East Lancs road we went on to</p> <p>17 Warrington Road which leads towards Culcheth and I was</p> <p>18 aware at this point the red Audi was approximately</p> <p>19 one mile in front of our convoy heading towards</p> <p>20 Culcheth."</p> <p>21 A. Yes, I believe it was heading towards Culcheth, sir. We</p> <p>22 were coming from Leigh, sir.</p> <p>23 Q. We have seen what the plan was the previous day, as X7</p> <p>24 announced, namely to prevent the vehicle from getting to</p> <p>25 Culcheth.</p> <p style="text-align: center;">Page 147</p>
<p>1 Were you party to any discussion with Q9 in the</p> <p>2 course of the day about the subjects' backgrounds?</p> <p>3 A. No, sir.</p> <p>4 Q. Did you hear a discussion that he had with X7 over that</p> <p>5 issue?</p> <p>6 A. Not that I recall, sir. No.</p> <p>7 Q. We can put bundle 2 away, thank you. At about 6.15 you</p> <p>8 moved off from Leigh?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Can you recall what it was that caused you to move off?</p> <p>11 A. I believe it was movement of the subject vehicle, sir.</p> <p>12 Q. You say in your statement that:</p> <p>13 "We deployed from Leigh police station in convoy</p> <p>14 towards the East Lancs road after information received</p> <p>15 that the stolen Audi was on the move and heading towards</p> <p>16 the Culcheth area."</p> <p>17 Yes?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Was it the receipt of this information that caused you</p> <p>20 to move?</p> <p>21 A. It would actually have been X7 telling us that we were</p> <p>22 going to move, sir.</p> <p>23 Q. Yes, but was it because X7 had received information that</p> <p>24 the subjects were on the move?</p> <p>25 A. I believe so, sir.</p> <p style="text-align: center;">Page 146</p>	<p>1 A. Yes, sir.</p> <p>2 Q. Can you recall any discussion that day as to whether</p> <p>3 there was an intention to do that again?</p> <p>4 A. I don't recall, sir.</p> <p>5 Q. Or instead whether the plan was to let the vehicle run,</p> <p>6 positively let it run until it reached Culcheth?</p> <p>7 A. I don't recall that, sir.</p> <p>8 Q. You say:</p> <p>9 "The convoy of four MASTS vehicles then entered the</p> <p>10 car park of a public house on Warrington Road, delta</p> <p>11 vehicle deployed off towards Culcheth where they were to</p> <p>12 lay up and await further instructions. The remaining</p> <p>13 three, alpha, bravo and charlie remained at the ..."</p> <p>14 I think it was at the Raven Inn, is that right?</p> <p>15 A. Yes, sir, that was my recollection, yes, sir.</p> <p>16 Q. Again, at that point was there any discussion as far as</p> <p>17 you can remember now of what the plan was?</p> <p>18 A. Not that I recall, sir.</p> <p>19 Q. Okay.</p> <p>20 A. No, not that I recall. Other than the delta vehicle</p> <p>21 pushing forward, sir.</p> <p>22 Q. Yes. Then if we can look at the foot of page 2 of your</p> <p>23 witness statement:</p> <p>24 "Shortly after 19.00 the remaining three vehicles</p> <p>25 made our way off the public house car park on to</p> <p style="text-align: center;">Page 148</p>

1 Warrington Road heading slowly towards Culcheth."
 2 **A. Yes, sir. We actually stopped along that road, sir, at**
 3 **one point.**
 4 Q. There was a pause was there?
 5 **A. Yes, sir.**
 6 Q. Then if you look at the next four paragraphs on page 3,
 7 yes?
 8 **A. Yes, sir.**
 9 Q. Just read those, and the chairman will as well, they
 10 narrate the time before Amber was called, as Amber was
 11 called, yes?
 12 **A. Yes, sir.**
 13 Q. And then as Red was called and you struck, yes?
 14 **A. Yes, sir.**
 15 Q. In those four paragraphs you don't set out that X7
 16 discussed within the vehicle what the plan was, do you?
 17 **A. No, sir.**
 18 Q. Is that reflective of the fact that there wasn't
 19 a discussion of what the plan was?
 20 **A. I don't recall, sir.**
 21 Q. You don't set out in those four paragraphs X7
 22 broadcasting to the bravo, charlie or even delta cars
 23 what the plan was?
 24 **A. No, sir.**
 25 Q. Is that reflective of the fact that there wasn't

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1 a broadcast?
 2 **A. I don't recall, sir, whether he did or didn't broadcast**
 3 **anything.**
 4 Q. Do you remember now any discussion at all about what the
 5 tactics were to be?
 6 **A. At what point, sir?**
 7 Q. Any point before the words "Strike, strike" was called.
 8 **A. Yes, sir. Prior to the car park there was a discussion**
 9 **that the alpha vehicle, which I was driving, would drive**
 10 **alongside or basically T-bone the Audi. I remember**
 11 **a conversation that Q9 was going to give cover from his**
 12 **window and I believe that the alpha vehicle other**
 13 **officers were going to go to the offside of the vehicle.**
 14 Q. The first and the third of those things, ie what
 15 approach your vehicle would make to the subject vehicle,
 16 and then which side of the vehicle the other officers X7
 17 and W9 would go to, is not mentioned at all, is it?
 18 **A. No, sir.**
 19 Q. I don't think it is elsewhere in your statements.
 20 **A. Okay, sir.**
 21 Q. Is there any reason for that, that these, what might be
 22 thought to be important discussions over the tactics to
 23 be adopted hasn't been included in your accounts and
 24 that we are hearing them for the first time today?
 25 **A. No, sir, it's an oversight by myself, I would say, sir.**

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1 **I certainly remember the conversation in relation to**
 2 **T-boning the front of the car and I also remember the**
 3 **conversation in relation to Q9 putting cover on.**
 4 Q. I have not asked you about cover at the moment, it was
 5 more about I said the first and the third.
 6 **A. Sorry.**
 7 Q. The thing about putting cover on, that is mentioned at
 8 the foot of page 3 of your witness statement --
 9 **A. Points one and three are not in there, no, sir. That**
 10 **an oversight by me, sir, but I do remember the**
 11 **discussions within the vehicle.**
 12 Q. You say in relation to the second of the points, which
 13 was Q9 putting cover on from the vehicle:
 14 "After 'Strike, strike' had occurred [the second
 15 paragraph from the bottom] I then positioned the alpha
 16 vehicle directly in front of the red Audi A6, so that my
 17 offside was directly against the bonnet of the red
 18 Audi."
 19 Yes?
 20 **A. Yes, sir.**
 21 Q. "I then brought my vehicle to a complete stop."
 22 You say:
 23 "I was aware at this point that it had been agreed
 24 that Q9 would put cover on the Audi ..."
 25 Yes?

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1 **A. Yes, sir.**
 2 Q. "... whilst they were deployed."
 3 Do you mean by that, and I don't want to criticise
 4 you for your use of language here, "It had been already
 5 discussed and therefore I knew by the time my vehicle
 6 was brought to a complete stop that Q9 was going to put
 7 cover on"?
 8 **A. Yes, sir.**
 9 Q. It wasn't that you became aware at this point?
 10 **A. No, sir. I knew it was going to happen, sir.**
 11 Q. You knew it was going to happen?
 12 **A. Yes, sir.**
 13 Q. When did you know it was going to happen, when did you
 14 first know it was going to happen?
 15 **A. I don't recall, sir. It was not a long time before the**
 16 **actual "Strike, strike, strike", sir.**
 17 Q. Do you think it was as you went across the car park?
 18 **A. Possibly, sir, or possibly at the entrance to the car**
 19 **park. I don't recall, sir.**
 20 Q. As you turned on to the car park or as you went across,
 21 possibly?
 22 **A. Yes, I don't recall specifically when it was, sir.**
 23 Q. Did that suggestion come from Q9?
 24 **A. I believe so, sir.**
 25 Q. Was that suggestion agreed to by X7?

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<p>1 A. I believe so, sir.</p> <p>2 Q. Was it broadcast to the bravo and charlie cars?</p> <p>3 A. I don't recall that, sir.</p> <p>4 Q. Winding back a little bit then --</p> <p>5 A. Yes, sir.</p> <p>6 Q. -- the top of the page, you were informed by X7 a few</p> <p>7 minutes later, you were condition Amber with the</p> <p>8 authority to conduct a MASTS strike on the red Audi.</p> <p>9 Yes?</p> <p>10 A. Yes, sir.</p> <p>11 Q. You say:</p> <p>12 "... which we had received information on was now</p> <p>13 parked at the bottom end of the car park on the offside</p> <p>14 of Jackson Avenue, in the last space on the right-hand</p> <p>15 side as you entered from Jackson Avenue."</p> <p>16 Yes?</p> <p>17 A. Yes, sir.</p> <p>18 Q. When did you receive that information?</p> <p>19 A. I don't recall that, sir, I just remember receiving that</p> <p>20 information, sir.</p> <p>21 Q. We have heard evidence, the chairman has heard evidence</p> <p>22 already that at 6.45 pm --</p> <p>23 A. Okay, sir.</p> <p>24 Q. -- the vehicle parked up in that position and was</p> <p>25 observed to park up in that position by surveillance</p> <p style="text-align: center;">Page 153</p>	<p>1 "X7 informed the rest of the convoy that the alpha</p> <p>2 vehicle would position itself directly across the front</p> <p>3 of the Audi."</p> <p>4 Yes.</p> <p>5 A. Yes, sir.</p> <p>6 Q. Was that when you were on the car park?</p> <p>7 A. I believe so, sir.</p> <p>8 Q. When you drove on to the car park were the lights of the</p> <p>9 red Audi illuminated?</p> <p>10 A. I don't recall, sir.</p> <p>11 Q. When you drove on, could you see anyone in the vehicle?</p> <p>12 A. Not from -- as I drove on to the car park initially,</p> <p>13 sir, no.</p> <p>14 Q. As you became, as you got closer to the vehicle, could</p> <p>15 you see if there was anyone in the vehicle?</p> <p>16 A. Only as my vehicle came across that vehicle, sir.</p> <p>17 Q. You were approaching it from its nearside, weren't you?</p> <p>18 A. Yes, sir.</p> <p>19 Q. So you had your headlights on?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Your headlights would have illuminated the front</p> <p>22 passenger window? The front nearside window?</p> <p>23 A. I don't recall, sir. Without looking at a diagram</p> <p>24 I couldn't say that, sir.</p> <p>25 Q. We can look at a diagram, if you take out the general</p> <p style="text-align: center;">Page 155</p>
<p>1 officers.</p> <p>2 Do you recall receiving information that early on?</p> <p>3 A. I don't recall, sir. I recall receiving information</p> <p>4 that that is where the vehicle was parked, but in</p> <p>5 relation to timing, sir, no.</p> <p>6 Q. Can you recall there being a time when the surveillance</p> <p>7 officers lost eyes on the subject vehicle?</p> <p>8 A. Again, I don't recall that, sir.</p> <p>9 Q. Can you remember an appreciable period of delay from</p> <p>10 when the subject vehicle had entered Culcheth until you</p> <p>11 were given authority to conduct the strike on the red</p> <p>12 Audi?</p> <p>13 A. Yes, sir, that is why we drove slowly towards Culcheth,</p> <p>14 it caused a delay.</p> <p>15 Q. Can you recall there was a time when there was</p> <p>16 uncertainty over whether the subjects were still in the</p> <p>17 vehicle?</p> <p>18 A. I don't recall that, sir.</p> <p>19 Q. You say that as you approached the roundabout X7</p> <p>20 informed you that you were at condition Red, yes?</p> <p>21 A. Yes, sir.</p> <p>22 Q. You drove into Jackson Avenue then right on to the car</p> <p>23 park, yes?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Then you say here:</p> <p style="text-align: center;">Page 154</p>	<p>1 file, file 2 --</p> <p>2 THE CHAIRMAN: 586, is it?</p> <p>3 MR BEER: If you look at either tabs 28 or 29.</p> <p>4 A. Yes, sir?</p> <p>5 THE CHAIRMAN: Tab 28, 586, is it?</p> <p>6 MR BEER: Look at 586, please.</p> <p>7 THE CHAIRMAN: You may have a different number in your file,</p> <p>8 but it looks like that.</p> <p>9 A. Yes, sir, I have that.</p> <p>10 MR BEER: Thank you. Does that depict roughly the</p> <p>11 orientation of the vehicles, the four of them, after</p> <p>12 each had come to a stop.</p> <p>13 A. Yes, sir.</p> <p>14 Q. As you drove on to get into that position, there would</p> <p>15 have been a time when you were in the lane of the</p> <p>16 parking --</p> <p>17 A. Yes, sir.</p> <p>18 Q. -- that you would have seen or illuminated the front</p> <p>19 nearside of the Audi.</p> <p>20 A. I recall seeing the front of the Audi, sir, the bonnet</p> <p>21 area, the actual nearside -- do you mean the nearside</p> <p>22 passenger window, sir?</p> <p>23 Q. Yes.</p> <p>24 A. I don't recall that, sir, when I saw that, sir.</p> <p>25 Q. Are you saying you didn't know one way or another</p> <p style="text-align: center;">Page 156</p>

<p>1 whether -- before you had stopped, that there was 2 somebody in the front nearside passenger seat? 3 A. Yes, sir. 4 Q. You brought the vehicle to a stop; is that right? 5 A. Correct, sir. 6 Q. So as to box the subject vehicle in? 7 A. Yes, sir. 8 Q. Did your vehicle make contact, even slight contact, with 9 the front of the Audi? 10 A. Not that I was aware of, sir, no. 11 Q. Did you think you had placed an effective block in front 12 of the vehicle? 13 A. Yes, sir. 14 Q. At this point were there any signs that the vehicle's 15 engine was on? 16 A. No, sir, not that I could tell. 17 Q. What were you wearing at this point? 18 A. To be honest sir, I don't recall. 19 Q. Was it general plainclothes? 20 A. Yes, sir. 21 Q. Were you wearing any identifying features that you were 22 a police officer? 23 A. I don't believe so, sir, no. 24 Q. No strike jacket? 25 A. Not that I am aware of, sir.</p> <p style="text-align: center;">Page 157</p>	<p>1 A. Yes, sir, I crawled on to the car park pretty much, was 2 going extremely slow until I identified where the Audi 3 was and as soon as I saw where the Audi was, sir, then 4 yes I did accelerate, but not aggressively. It was just 5 an average speed, sir. 6 Q. Did you pull up suddenly? 7 A. No, sir, not suddenly. That is not how I am trained to 8 do it. 9 Q. What was the first thing you were aware of after you had 10 stopped? 11 A. The first thing I was aware of, the next thing I was 12 aware of, sir, was shouting from Q9. 13 Q. What did Q9 shout? 14 A. "Armed police, show me your hands, show me your hands." 15 Q. Was the vehicle at a complete standstill when Q9 shouted 16 that? 17 A. I believe so, sir, yes. 18 Q. Did you have a weapon on you at this time? 19 A. Yes, sir. 20 Q. What weapon or weapons? 21 A. My Glock 9-millimetre on me, sir. 22 Q. Where was that stowed? 23 A. It was stowed in its holster on my hip, sir. 24 Q. Was that your right hip? 25 A. Yes, sir.</p> <p style="text-align: center;">Page 159</p>
<p>1 Q. No cap? 2 A. No, sir. 3 Q. Did you at any stage don a respirator? 4 A. No, sir. 5 Q. Was your driver's window up? 6 A. Yes, sir. 7 Q. Were all of your vehicle's windows up? 8 A. I believe Q9's was down, sir. Certainly mine was up and 9 X7's was up. I couldn't speak for the other officer, 10 sir. 11 Q. Were you aware of Q9 lowering his window? 12 A. I don't recall, sir. 13 Q. You cannot help us with the point at which it was 14 lowered, if it was? 15 A. Not that I recall, sir. 16 Q. What type of speed did you use to put yourself in 17 position to make the block? 18 A. Just normal speed that you drive on to a car park, sir. 19 Q. Did you accelerate towards the end of your journey? 20 A. No, sir, not particularly. 21 Q. In your statement, you say: 22 "I drove slowly on to the car park and headed 23 towards the end whereupon I saw the red Audi, once 24 I confirmed its position I accelerated towards the red 25 Audi."</p> <p style="text-align: center;">Page 158</p>	<p>1 Q. Any other weapons? 2 A. Taser, sir. 3 Q. Which was stowed? 4 A. It would have been on my left hip, sir. 5 Q. Anything else? 6 A. Not on my person, sir, no. 7 Q. You carry a MP5 but not physically on you, is that 8 right? 9 A. Correct, sir, it is normally bagged and it was on this 10 occasion in the boot of the vehicle. 11 Q. Is that so you can perform your function as the driver? 12 A. Yes, sir. 13 Q. Did you draw your weapon? 14 A. No, sir. 15 Q. Why not? 16 A. Because I was in control of the vehicle, sir, I didn't 17 have time -- 18 Q. No, no, sorry, after it had stopped? 19 A. After the vehicle had stopped? No, sir, it is not 20 something we are trained to do. 21 Q. Why are you not trained to draw your weapon? 22 A. It is not something we train the drivers to do, sir. 23 Q. But why? 24 A. I don't know why, sir, if I was in ... I don't know why 25 we don't train to do it, sir. But it is not something</p> <p style="text-align: center;">Page 160</p>

1 **we train the drivers to do, it is just you teach the**
 2 **drivers that basically they are there to drive the**
 3 **vehicle, sir.**
 4 Q. You just broadsided a car that certainly some other
 5 officers thought contained armed and dangerous
 6 criminals?
 7 **A. Yes, sir.**
 8 Q. You were sitting directly in their line of sight?
 9 **A. Yes, sir.**
 10 Q. Did you feel vulnerable?
 11 **A. Yes, sir.**
 12 Q. So it was your training that said don't draw your
 13 weapon?
 14 **A. Yes, sir. I knew that Q9 was covering that side of the**
 15 **vehicle and my responsibility as driver was to keep that**
 16 **vehicle where it was.**
 17 Q. Did you have to depress any buttons or pull a handbrake
 18 to ensure the vehicle didn't move?
 19 **A. I will have held it on the foot brake, sir, and at some**
 20 **point I will have engaged -- I believe it was**
 21 **an electronic handbrake on that vehicle, sir.**
 22 Q. Did you turn the engine off?
 23 **A. I did at some point, sir, yes.**
 24 MR BEER: Sir, that might be a convenient moment.
 25 THE CHAIRMAN: Yes, thank you. We will take a slightly

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1 longer break than usual, 10 minutes. Would you like to
 2 hang on there for a second until the usher has come
 3 round to escort you away.
 4 (3.20 pm)
 5 (A short adjournment)
 6 (3.34 pm)
 7 THE CHAIRMAN: Yes, Mr Beer.
 8 MR BEER: Thank you, sir.
 9 Can we turn to the bottom of page 3 of your first
 10 witness statement, please --
 11 **A. Yes, sir.**
 12 Q. -- and the last four lines.
 13 You say:
 14 "After Q9 shouted 'Armed police ...' I looked
 15 towards my right where I could see the occupants of the
 16 red Audi and that there was a male in the driver's seat
 17 and a male in the front passenger seat, with a further
 18 person in the rear nearside of the red Audi."
 19 **A. Yes, sir.**
 20 Q. Was that the first sight of the three males that you
 21 had?
 22 **A. Yes, sir.**
 23 Q. Over the page, you say:
 24 "Both males in the front seats put their hands up,
 25 however I cannot say what the person in the rear seat

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1 did as at this point my concentration was on the front
 2 two males, who I could see were being covered by the
 3 ultra dot from a MP5."
 4 Yes?
 5 **A. Yes, sir.**
 6 Q. "I then saw the driver of the red Audi drop down his
 7 right hand towards his lap and this was closely followed
 8 by a loud bang, which I knew to be a gunshot."
 9 **A. Yes, sir.**
 10 Q. You saw the windscreen was penetrated and the driver was
 11 starting to slump to his left-hand side?
 12 **A. Yes, sir.**
 13 Q. Then you got out of the seat, yes?
 14 **A. Yes, sir.**
 15 Q. In that account of the moments of Mr Grainger being shot
 16 you do not describe Q9's TAC light as being switched on,
 17 do you?
 18 **A. Not in this statement, sir, but it was on.**
 19 Q. You do not say in this statement that the green strobe
 20 light of Q9's MP5 was on, do you?
 21 **A. That is what I meant by "ultra dot", sir, I put the**
 22 **wrong wording.**
 23 Q. You do say that it was being covered by an ultra dot,
 24 whereas it wasn't covered by an ultra dot, was it?
 25 **A. No, sir, I put the wrong wording. The ultra dot is**

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1 **actually an optic within the sight, what this was was**
 2 **the green lasers.**
 3 Q. Why, if the TAC light was in fact switched on and the
 4 green strobe was in fact switched on, but you could not
 5 see the ultra dot, did you fail to describe the two
 6 accurate things but instead described the one inaccurate
 7 thing?
 8 **A. I don't know, sir.**
 9 Q. This is probably the only time you have been involved in
 10 a fatal shooting; is that right?
 11 **A. Yes, sir.**
 12 Q. You would know that your sighting of the subjects is
 13 important evidence, wouldn't you?
 14 **A. Yes, sir.**
 15 Q. And your ability to view their actions, including by
 16 reference to the lighting conditions, would be important
 17 evidence, wouldn't you?
 18 **A. Yes, sir, and I have not put it in my statement.**
 19 Q. In your second statement, 22 May --
 20 **A. Yes, sir.**
 21 Q. -- two and a half months on, in tab 2, if you look at
 22 the second page, you say:
 23 "I was then myself positioned directly in front of
 24 the driver's side of the subject vehicle, with
 25 an unobstructed view in the windscreen, which as

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<p>1 I looked towards was immediately illuminated by the TAC 2 light of Q9." 3 A. Yes, sir. 4 Q. Yes? 5 "When Q9 illuminated the front of the subject 6 vehicle, I could clearly see the front two occupants of 7 the vehicle and that there was a further person in the 8 rear nearside." 9 Yes? 10 A. Yes, sir. 11 Q. In that statement, you don't describe the green strobe 12 light, do you? 13 A. No, sir, but in my first statement the ultra dot is what 14 I meant by the strobe light, sir, because I could 15 visibly see it. I wouldn't be able to visibly see the 16 ultra dot. 17 Q. You were very familiar with the weapons system on the 18 MP5, weren't you? 19 A. Fairly familiar, sir, yes. 20 Q. Sorry? 21 A. Fairly familiar, yes. 22 Q. Why only "fairly familiar"? 23 A. The strobe lights were fairly new to us at that time, 24 sir. 25 Q. How new?</p> <p style="text-align: center;">Page 165</p>	<p>1 Q. Sorry, yes, the next thing you heard. 2 A. Yes, after Mr Grainger had dropped his hand, the next 3 thing I heard was a shot, sir. 4 Q. You say that you saw the driver of the red Audi drop 5 down his right hand towards his lap? 6 A. Yes, sir. 7 Q. Could you see his lap? 8 A. I couldn't see his lap, sir, no. 9 Q. How much of his body could you see? 10 A. The majority of his top half, sir, or all of his top 11 half. 12 Q. By reference to anatomy, can you describe how much you 13 could see? 14 A. From basically this sort of area upward. (Indicates) 15 THE CHAIRMAN: You are pointing -- 16 A. Sort of midriff sort of area, I would say, yes, from 17 looking into a vehicle normally. 18 THE CHAIRMAN: Upper midriff? 19 MR BEER: One person's midriff is somebody else's stomach. 20 THE CHAIRMAN: We should have some description. 21 MR BEER: I would say that that was a point below the 22 nipples at the point of the sternum. 23 A. Sternum area, yes, sir. 24 Q. Could you see whether Mr Grainger had anything on his 25 hands?</p> <p style="text-align: center;">Page 167</p>
<p>1 A. I can't recollect, sir, but they were not something that 2 we had had for that long. 3 Q. What, days, weeks, months or -- 4 A. I can't recall, sir, but it wasn't for a long time. 5 Q. You would know that the ultra dot system is a different 6 system than the green strobe light, wouldn't you? 7 A. Yes, sir, I put the wrong wording in. 8 Q. Just help us then, if the TAC light was helping to 9 illuminate the passenger and the driver, why didn't you 10 describe it in your first statement? 11 A. I don't know, sir. Just something I have missed out. 12 Q. Did you see the TAC light and/or the green strobe light 13 move between the two males in the front two seats? 14 A. I certainly saw the green strobe light moving, sir. 15 Q. On whom did it start? 16 A. I believe Mr Totton, initially. But it did move, 17 I can't recall exactly where it went, sir. 18 Q. Did you see it switch to Mr Grainger at any point? 19 A. Yes, sir. 20 Q. Was that before or after the shot? 21 A. Before, sir. 22 Q. Did you see it switch back to Mr Totton before the shot? 23 A. I don't recall that, sir. 24 Q. Was the next thing you saw the shot? 25 A. The next thing I heard was the shot, sir.</p> <p style="text-align: center;">Page 166</p>	<p>1 A. Gloves, sir. 2 Q. Do you describe those in your statement? 3 A. No, sir. 4 Q. Why is that? 5 A. Oversight by myself, sir. Both of them had gloves on. 6 Q. Would you agree that, on the account that you have 7 given, there were a number of matters that have either 8 been missed out or wrongly described? 9 A. Yes, sir, there is some parts that I should have placed 10 in there. 11 Q. Relating in particular to the moment that you saw 12 Mr Grainger raise and then lower one of his hands, 13 yes -- raise both of his hands and then lower one of 14 them? 15 A. Raise both of his hands, sir, and then lower one of 16 them. Yes, sir. 17 Q. Why is that? 18 A. Can you just repeat that again, sir? Because I do 19 actually say that in the statement that I have seen both 20 his hands go up but then I have seen his right hand drop 21 down towards his lap. 22 Q. Why is it that there are a number of matters omitted and 23 some wrongly described in relation to precisely the 24 moments when Mr Grainger was raising his hands and then 25 lowering one of them?</p> <p style="text-align: center;">Page 168</p>

<p>1 A. Do you mean in relation to gloves, sir.</p> <p>2 Q. I mean in relation to not describing the TAC light, to</p> <p>3 wrongly describing the ultra dot, to not describing the</p> <p>4 green strobe light, to not describing him wearing</p> <p>5 gloves, to not --</p> <p>6 A. I don't know, sir.</p> <p>7 Q. -- describing Mr Totton wearing gloves.</p> <p>8 A. Six days afterwards, sir, I don't know. It is something</p> <p>9 I failed to put into the statement.</p> <p>10 Q. You say that you saw the driver of the red Audi drop</p> <p>11 down his right hand towards his lap?</p> <p>12 A. Yes, sir.</p> <p>13 Q. You couldn't see his lap?</p> <p>14 A. No, sir.</p> <p>15 Q. How did you know he was dropping it towards his lap?</p> <p>16 A. Because it was going in that general direction, sir, and</p> <p>17 if it -- as it came down, that is where it would have</p> <p>18 naturally fallen.</p> <p>19 Q. How do you know?</p> <p>20 A. Because that is what I saw, sir.</p> <p>21 Q. Why would it not have gone down to the door handle?</p> <p>22 A. Because it was going straight down, sir.</p> <p>23 Q. So from like this, to like that? (Indicates)</p> <p>24 A. So from like this, sir, to like that. (Indicates)</p> <p>25 So naturally towards your lap.</p> <p style="text-align: center;">Page 169</p>	<p>1 A. No, sir.</p> <p>2 Q. Is that because you didn't think this man was reaching</p> <p>3 for a weapon?</p> <p>4 A. Not at all, sir, it is because I knew that Q9 was</p> <p>5 covering that side of the vehicle, sir.</p> <p>6 Q. Did you think he was reaching for a weapon then?</p> <p>7 A. The thought did go through my mind, sir, yes.</p> <p>8 Q. Why didn't you put that in your witness statement?</p> <p>9 A. Because it was only a thought at the time, sir.</p> <p>10 I couldn't actually say that is what he was doing.</p> <p>11 Q. Quite an important thought, wouldn't it be, "I thought</p> <p>12 this man was reaching for a weapon", you knew one of</p> <p>13 your colleagues by the time you made this statement had</p> <p>14 shot a man dead.</p> <p>15 A. On reflection now, sir, yes.</p> <p>16 Q. You knew by the time you were making this statement that</p> <p>17 your colleague had shot a man dead and you are telling</p> <p>18 the chairman that you thought in the moments before he</p> <p>19 was killed that he was reaching for a firearm?</p> <p>20 A. The thought went through my mind, sir, yes.</p> <p>21 Q. And you didn't include that in your account?</p> <p>22 A. No, sir.</p> <p>23 All I knew is that his hand had dropped away and he</p> <p>24 was not complying with what he had been told to do, sir.</p> <p>25 Q. Presumably when the shot had been fired, you then took</p> <p style="text-align: center;">Page 171</p>
<p>1 Q. Was his hand angling inwards towards his groin area?</p> <p>2 A. It was just going down, sir, I just remember it going</p> <p>3 down.</p> <p>4 Q. Did you want to give the impression that it was going</p> <p>5 towards his lap in order to create the possibility that</p> <p>6 he was reaching towards a weapon?</p> <p>7 A. No, sir.</p> <p>8 Q. Wouldn't the natural way of describing what you saw to</p> <p>9 be that you saw his hand move out of view below the</p> <p>10 height of the dashboard --</p> <p>11 A. No, sir.</p> <p>12 Q. -- or that you saw his hand disappear from your view?</p> <p>13 A. Again, that is wording, sir, but his hand dropped down,</p> <p>14 yes, it dropped down away from view but it dropped down.</p> <p>15 Q. Wouldn't that be the natural way to describe things?</p> <p>16 A. It is not how I would describe things, sir, myself</p> <p>17 personally.</p> <p>18 Q. You don't describe any movement of his left hand.</p> <p>19 A. No, sir.</p> <p>20 Q. Was there therefore no movement of his left hand?</p> <p>21 A. Once the shot had been fired, sir.</p> <p>22 Q. Yes, sorry, my mistake, I am talking about before the</p> <p>23 shot had been fired.</p> <p>24 A. Not that I recall, sir.</p> <p>25 Q. You didn't reach for your gun at any point?</p> <p style="text-align: center;">Page 170</p>	<p>1 your weapon out?</p> <p>2 A. No, sir.</p> <p>3 Q. Why not?</p> <p>4 A. I stayed -- I continued looking towards Mr Grainger, saw</p> <p>5 him began to slump to his left-hand side and continued</p> <p>6 basically looking towards him at that point.</p> <p>7 Q. So you were really sitting there watching?</p> <p>8 A. Yes, sir.</p> <p>9 Q. You didn't feel under any threat yourself?</p> <p>10 A. I felt vulnerable, sir, yes.</p> <p>11 Q. But you didn't take your weapon out?</p> <p>12 A. No, sir.</p> <p>13 In the position where I was seated, I wouldn't have</p> <p>14 been able to anyway, sir, in relation to, you know,</p> <p>15 firing a shot, sir.</p> <p>16 Q. What, you couldn't turn sideways?</p> <p>17 A. I would have had to have put the window down, turn</p> <p>18 sideways, got the weapon out, brought it up on aim, sir.</p> <p>19 Q. It was the practicalities of doing it that stopped you?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Did you duck down at all?</p> <p>22 A. I don't recall, sir -- I certainly didn't duck down,</p> <p>23 sir, if you mean duck forward and duck down, no, sir.</p> <p>24 Q. Yes, or lean to one side?</p> <p>25 A. I may have leaned backwards, sir, I can't recall, no.</p> <p style="text-align: center;">Page 172</p>

1 Q. You then scrambled out over the front passenger seat,
 2 yes?
 3 **A. Yes, sir.**
 4 Q. You I think stood up in the nearside passenger footwell,
 5 leaning over the roof of the vehicle, is that right?
 6 **A. Yes, sir. From what I saw was happening, I didn't**
 7 **believe that other officers had realised that**
 8 **Mr Grainger had been shot.**
 9 Q. Did you see U2 leaning into the red Audi trying to get
 10 the driver out?
 11 **A. Yes, sir.**
 12 Q. Did you shout, "He has been shot, he has been shot"?
 13 **A. I shouted it, sir, and I also pointed with my hand.**
 14 Q. Then did you hear shouts of "Trauma, trauma" going up?
 15 **A. Yes, sir.**
 16 Q. Did you get a trauma kit?
 17 **A. I went to look for one, sir, initially.**
 18 Q. Had the kit already been taken?
 19 **A. I believe so, sir, yes.**
 20 Q. Did you then radio for an ambulance?
 21 **A. I shouted up on, I believe, it was the TAC adviser's**
 22 **radio, sir, to relay that shots had been fired and that**
 23 **we required an ambulance.**
 24 Q. Did you participate at all in the provision of first
 25 aid, directly in relation to Mr Grainger?

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1 **A. Directly in relation to first aid, no.**
 2 Q. Between the time that your vehicle stopped and the shot
 3 being fired, how long elapsed?
 4 **A. A couple of seconds, sir.**
 5 Q. At the point that the shot was fired, you I don't think
 6 could see X7, could you?
 7 **A. No, sir.**
 8 Q. You couldn't see W9?
 9 **A. No, sir.**
 10 Q. Were they still in the process of starting to deploy
 11 from your vehicle?
 12 **A. I believe so, sir.**
 13 Q. At the point that the shot had been fired, on your
 14 understanding, or your view, they wouldn't have emerged
 15 from behind the alpha vehicle -- behind the nearside of
 16 the alpha vehicle?
 17 **A. Correct, sir, there was nobody near that vehicle at that**
 18 **time.**
 19 THE CHAIRMAN: Near the subject vehicle you mean?
 20 **A. Near the subject vehicle, sir, yes, sorry.**
 21 MR BEER: I think you describe this in your second
 22 statement, if we can go to tab 2, please.
 23 The second page, fourth paragraph you say:
 24 "From my vehicle stopping to the shot being fired by
 25 Q9 was approximately three to four seconds, and at this

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1 point no officer had reached or deployed on to the
 2 subject vehicle."
 3 **A. Correct, yes, sir.**
 4 Q. Yes?
 5 At the point that the shot was fired, X7 and W9 had
 6 not emerged from the nearside of your vehicle?
 7 **A. No, sir.**
 8 Q. You saw, I think, the CSDC being deployed?
 9 **A. Yes, I saw officers then start to come towards the**
 10 **vehicle, sir, and I saw the CSDC be deployed.**
 11 Q. Was that before or after the shot was fired?
 12 **A. That was well after the shot had been fired, sir.**
 13 Q. You say here it was seconds after the shot was fired; is
 14 that right?
 15 **A. Yes, it was after the shot had been fired, sir.**
 16 Q. Did you see the shotgun being deployed?
 17 **A. I heard I believe the shotgun going off, but I couldn't**
 18 **say whether I saw it or not, sir, without going through**
 19 **my statement of whether I had seen it on there, sir.**
 20 Q. You were sitting in the driver's seat of the car, you
 21 saw the shot?
 22 **A. Yes, sir.**
 23 Q. You subsequently saw the CSDC going in, yes?
 24 **A. Yes, sir.**
 25 Q. Did you observe other officers, including U2 and X7

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1 deploying on to the vehicle in between?
 2 **A. In between that, sir?**
 3 Q. Yes, the shot --
 4 **A. I just saw officers going in towards the vehicle, sir.**
 5 Q. You cannot describe who they were?
 6 **A. Not specifically, sir, no.**
 7 Q. Did you subsequently attend Claytonbrook as part of
 8 a post-incident procedure?
 9 **A. I did, sir, yes.**
 10 Q. Were you personally given any legal advice that night?
 11 **A. No, sir.**
 12 Q. Were you asked to give an account that night?
 13 **A. Not that I recall, sir, no.**
 14 Q. Did you give an account that night?
 15 **A. No, sir.**
 16 Q. Did you speak with other officers about what had
 17 happened that night?
 18 **A. No, sir.**
 19 MR BEER: Thank you very much.
 20 Those are the questions that I ask.
 21 THE CHAIRMAN: Mr Thomas?
 22 MR THOMAS: Thank you, sir.
 23 Questions from MR THOMAS
 24 MR THOMAS: W4, my name is Mr Thomas, I represent
 25 Mr Grainger's family?

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<p>1 A. Yes, sir.</p> <p>2 Q. This is his mother who sits alongside me, okay?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Okay.</p> <p>5 Can I start where Mr Beer left off.</p> <p>6 As far as you were concerned, in your vehicle, you</p> <p>7 were the only witness to the shooting, correct?</p> <p>8 A. I believe so now, sir, yes.</p> <p>9 Q. You say you believe so now?</p> <p>10 A. I have not read everyone else's statement, sir, so ...</p> <p>11 Q. You say you believe so now. At the time you witnessed</p> <p>12 the shooting, apart from Q9 being alongside you --</p> <p>13 A. Yes, sir.</p> <p>14 Q. -- was anybody else in your vehicle?</p> <p>15 A. I don't know, sir, because I was looking to the</p> <p>16 right-hand side. So, you are talking about a timeframe,</p> <p>17 so do you mean have they left the vehicle by the time</p> <p>18 I am looking -- I don't understand, what do you mean?</p> <p>19 Q. Simple question. Simple question. You have told us</p> <p>20 that you witnessed Mr Grainger being shot.</p> <p>21 A. Yes.</p> <p>22 Q. Right. So my question is, at the time Mr Grainger was</p> <p>23 shot, are you aware of anybody else being in your</p> <p>24 vehicle?</p> <p>25 A. No, sir.</p> <p style="text-align: center;">Page 177</p>	<p>1 Q. Why didn't you put pen to paper within 24 to 48 hours?</p> <p>2 A. I was on annual leave, sir, so I wasn't there until the</p> <p>3 Wednesday.</p> <p>4 Q. Forgive me, how does being on annual leave stop you from</p> <p>5 doing an initial account?</p> <p>6 A. I hadn't been total the process of which I would be</p> <p>7 going through at that point, sir --</p> <p>8 Q. Did you ask?</p> <p>9 A. -- as in relation to when I was going to give my</p> <p>10 statement.</p> <p>11 Q. Did you ask?</p> <p>12 A. No, sir.</p> <p>13 Q. Why didn't you ask?</p> <p>14 A. I asked on the Wednesday, sir, when I returned to duty.</p> <p>15 Q. How long have you been a police officer, did you say?</p> <p>16 A. 20 years, sir.</p> <p>17 Q. In your 20 years, tell me, how many times have you seen</p> <p>18 a police officer kill somebody?</p> <p>19 A. Once, sir.</p> <p>20 Q. Right. So you fully understood just how important your</p> <p>21 account would be?</p> <p>22 A. Yes, sir.</p> <p>23 Q. All right. Let's come back, you didn't put pen to paper</p> <p>24 that night?</p> <p>25 A. No, sir.</p> <p style="text-align: center;">Page 179</p>
<p>1 Q. Right. So, as far as you were concerned --</p> <p>2 A. Yes, sir.</p> <p>3 Q. -- you were the only person who witnessed the shooting?</p> <p>4 Obviously you have the shooter, Q9.</p> <p>5 A. Yes, sir.</p> <p>6 Q. Yes?</p> <p>7 A. Yes, sir.</p> <p>8 Q. All right. You must have known in your own head that</p> <p>9 the evidence that you would give would be important?</p> <p>10 A. No, sir, it was just my evidence.</p> <p>11 Q. Forgive me, you knew by the time you made your statement</p> <p>12 that a man had been killed.</p> <p>13 A. In relation to a man being killed then, yes, sir, of</p> <p>14 course my evidence would be important.</p> <p>15 Q. Of course. You must have known that that night, that</p> <p>16 Mr Grainger -- you knew that Mr Grainger had died?</p> <p>17 A. I did, sir, yes.</p> <p>18 Q. Right. You knew that your evidence would be important,</p> <p>19 because you were an eye witness?</p> <p>20 A. Yes, sir.</p> <p>21 Q. All right. Tell me this, bearing that in mind, why is</p> <p>22 it you didn't put pen to paper that night?</p> <p>23 A. It is protocol, sir, that we don't write statements</p> <p>24 immediately, that we have what we call like a cooling</p> <p>25 off period as such.</p> <p style="text-align: center;">Page 178</p>	<p>1 Q. You didn't put pen to paper until some six days</p> <p>2 afterwards?</p> <p>3 A. Correct, sir.</p> <p>4 Q. I would be right in thinking then you were concerned</p> <p>5 about, "I must get my account down in writing"?</p> <p>6 A. I definitely asked, sir.</p> <p>7 Q. My question is: am I right in thinking you were</p> <p>8 concerned that I must get my account down in writing?</p> <p>9 You were concerned about the fact that you hadn't put</p> <p>10 your account down in writing, especially when it was</p> <p>11 coming up to six days?</p> <p>12 A. I was not happy with the delay, sir, no.</p> <p>13 Q. Would I be right in thinking that during this period,</p> <p>14 nearly a week, the best part of a week, one day short of</p> <p>15 a week, what you had seen, what you had witnessed, the</p> <p>16 gravity, the fact that a man had died, had dawned on</p> <p>17 you?</p> <p>18 A. Of course it had dawned on me, sir, somebody had died.</p> <p>19 Q. Okay, and you knew the importance of getting the detail</p> <p>20 right?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Can you explain to the chairman this, bearing in mind</p> <p>23 everything that I have just put to you, you are telling</p> <p>24 us that you believed -- the thought went through your</p> <p>25 mind that Mr Grainger may have been going for a weapon,</p> <p style="text-align: center;">Page 180</p>

<p>1 may have had a weapon, that is what you just told</p> <p>2 Mr Beer?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Bearing in mind your colleague, you knew there would be</p> <p>5 an Inquiry like this?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Why isn't that in your statement, that you believed that</p> <p>8 this man may have had a weapon?</p> <p>9 A. I was asked if I thought he may have had a weapon. That</p> <p>10 thought did go through my mind, although I couldn't</p> <p>11 prove that he was going for a weapon, so it was just</p> <p>12 a thought at the time.</p> <p>13 Q. Sorry, that is not the question I asked you, the</p> <p>14 question --</p> <p>15 A. If you mean: did I feel threatened myself? Then yes.</p> <p>16 Q. Let me repeat the question.</p> <p>17 THE CHAIRMAN: Just let him finish what he was saying first,</p> <p>18 Mr Thomas.</p> <p>19 A. If you mean: did I feel in fear for my own safety? The</p> <p>20 answer is yes.</p> <p>21 MR THOMAS: No, that is not the question I am asking you.</p> <p>22 Simple question. You have told us that you believed</p> <p>23 that the man was going for a weapon, the thought went</p> <p>24 through your mind?</p> <p>25 A. The thought went through my mind, sir, yes.</p> <p style="text-align: center;">Page 181</p>	<p>1 A. Tab 1.</p> <p>2 MR THOMAS: Yes.</p> <p>3 A. 101?</p> <p>4 Q. Yes.</p> <p>5 A. Yes, sir.</p> <p>6 Q. This is where you first take up this incident just</p> <p>7 before the shooting, correct?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Right. Over the page --</p> <p>10 A. I am, sir, yes.</p> <p>11 Q. -- where does it say you were in fear of your safety?</p> <p>12 A. It doesn't, sir. But I am telling you that is how</p> <p>13 I felt, sir.</p> <p>14 Q. My question is: why isn't that in your witness</p> <p>15 statement?</p> <p>16 A. It isn't, sir. There is a few things that aren't in</p> <p>17 there that should be.</p> <p>18 Q. There are a number of things that are not in there,</p> <p>19 Mr Beer has been through several with you. I am going</p> <p>20 through two more with you --</p> <p>21 A. Yes, sir.</p> <p>22 Q. -- and I am asking you, the fact that you were in fear</p> <p>23 of your own safety is a highly relevant matter,</p> <p>24 isn't it, a man has been shot, there has to be</p> <p>25 a justification for shooting him, and I'm asking --</p> <p style="text-align: center;">Page 183</p>
<p>1 Q. Here is the question. If that thought went through your</p> <p>2 mind, bearing in mind you knew there was going to be</p> <p>3 an Inquiry, that a colleague would be investigated --</p> <p>4 A. Yes, sir.</p> <p>5 Q. -- why isn't that in your witness statement? That is</p> <p>6 the question.</p> <p>7 A. I don't know, sir.</p> <p>8 Q. You don't know?</p> <p>9 A. No, sir.</p> <p>10 Q. You have no explanation?</p> <p>11 A. No, sir.</p> <p>12 Q. Right.</p> <p>13 May I suggest the reason why you don't have</p> <p>14 an explanation is that thought didn't go through your</p> <p>15 mind. Because had it been, it would have been one of</p> <p>16 the first things you would have put in your witness</p> <p>17 statement?</p> <p>18 A. That thought definitely went through my mind, sir, and</p> <p>19 I was in fear for my own safety.</p> <p>20 Q. Have a look at your witness statement, it is still in</p> <p>21 front of you. Yes?</p> <p>22 A. Yes, sir.</p> <p>23 Q. I am looking at the bottom of page 101, are you there?</p> <p>24 A. Tab?</p> <p>25 THE CHAIRMAN: Tab 1.</p> <p style="text-align: center;">Page 182</p>	<p>1 A. It is not my justification, sir.</p> <p>2 Q. I understand that. I am asking you, you have just told</p> <p>3 us you were in fear of your own safety and my question</p> <p>4 to you is: why isn't that in this witness statement?</p> <p>5 A. Yes, sir, I should have put that in there.</p> <p>6 Q. No, that is not the question. The question is: why is</p> <p>7 it not in your witness statement?</p> <p>8 A. I don't know, sir. I just didn't think about it at the</p> <p>9 time to write in there. I didn't write the gloves in</p> <p>10 there.</p> <p>11 Q. But you had six days to ruminate over this, didn't you?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Again, may I suggest that you weren't in fear of your</p> <p>14 own safety, nor did you believe Mr Grainger had</p> <p>15 a weapon. Otherwise these details, these important</p> <p>16 details, would be in this account.</p> <p>17 A. That is not correct, sir.</p> <p>18 Q. Very well.</p> <p>19 Help us with this. Mr Totton --</p> <p>20 A. Yes, sir.</p> <p>21 Q. You were, what, just a matter of feet from Mr Grainger</p> <p>22 and Mr Totton when you boxed them in, correct?</p> <p>23 A. Roughly a car's bonnet, sir, yes.</p> <p>24 Q. Yes?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 184</p>

<p>1 Q. You have told us that you could see both men clearly, 2 Mr Grainger and Mr Totton? 3 A. Yes, sir. 4 Q. You said that Mr Grainger had been shot -- 5 A. Yes, sir. 6 Q. -- what happened to Mr Totton? 7 A. I don't know, sir. 8 Q. You took eyes off him? 9 A. Sir, I have just watched somebody be shot in front of my 10 eyes and I am watching that person at the time, sir. 11 Everything else at that moment just closed down, sir, 12 I was watching what was happening to that person. So no 13 I don't know what happened to Mr Totton, sir. 14 Q. Can I suggest an alternative narrative of what actually 15 happened that evening. Can I put some things to you, 16 please. 17 The first thing that you have said is you have said 18 that the shot takes place some three to four seconds 19 after your vehicle had come to a stop, correct? 20 A. I would have to look through my statement, sir, exact 21 times, two to three seconds I believe. 22 Q. Listen to what I am putting to you, because I don't want 23 us to be at cross purposes. 24 A. Okay, sir. 25 Q. I am only repeating the evidence that you have just</p> <p style="text-align: center;">Page 185</p>	<p>1 Q. All right. 2 Secondly, can we see if we can agree this. Your 3 evidence to the chairman of this Inquiry isn't, is it, 4 that Anthony Grainger raised his hands more than once? 5 A. No, sir. 6 Q. He raised his hands the once, correct? 7 A. Both hands once, sir, yes. 8 Q. Yes. 9 The next thing I want to see if we can agree on. 10 Your evidence isn't that after the shot fired by Q9 11 Anthony Grainger did anything other than slump, and that 12 was it and then you didn't see any more movement from 13 him, correct? 14 A. Other than his left hand started to go down as well, 15 sir, no. 16 Q. Hang on a second. Can we just go through what you just 17 said? 18 A. Yes, I will clarify it. 19 Q. No, bear with me, I will ask the question. 20 In fact I will repeat the question I asked you. 21 I said to you, can we agree that after Anthony had been 22 shot, other than slumping, you didn't perceive him to be 23 a threat, there was no movement? And you added other 24 than his left hand, and you can repeat what you just 25 said, other than his left hand doing what?</p> <p style="text-align: center;">Page 187</p>
<p>1 given. 2 A. Yes, sir. 3 Q. All right. You said to Mr Beer, just a moment ago, that 4 you heard the first shot, the shot from Q9 -- 5 A. Yes, sir. 6 Q. -- some three to four seconds after your vehicle had 7 come to a stop. 8 A. Yes, sir. 9 Q. You are not in a position to dispute, should this 10 Inquiry hear, whether X7 got out of your vehicle before 11 it came to a stop. Do you understand? 12 A. I do, sir. No, I am not, sir. 13 Q. No. 14 Because I believe the suggestion may be -- we 15 haven't heard him yet, he is due to give his evidence 16 tomorrow. 17 A. Yes, sir. 18 Q. But I believe the suggestion may be that he decamped 19 from your vehicle before it came to a stop, do you 20 understand? 21 A. It goes against training but yes, sir. 22 Q. We have heard from a couple of officers who have done 23 that in this Inquiry. 24 A. No, I don't dispute it, sir. I don't dispute that he 25 did that.</p> <p style="text-align: center;">Page 186</p>	<p>1 A. His left hand started to go down, sir. 2 Q. On your evidence then, on your account, the left hand 3 goes down after the shot? 4 A. Yes, sir, that I recall. 5 Q. You would say from your recollection, it is quite wrong 6 to suggest before Anthony is shot -- 7 THE CHAIRMAN: He has given his evidence, hasn't he? He has 8 given his recollection which is that the left hand went 9 down after the shot. 10 MR THOMAS: Sir, you have the point, I am going to move on. 11 Can I continue with the alternative narrative. 12 I am going to suggest to you that before Anthony was 13 shot, X7 was by the driver's door, do you follow? 14 A. I follow, but I don't agree, sir. 15 Q. All right. I am going to suggest to you that X7 -- 16 sorry, do you have any problems with your hearing? 17 A. No, sir. 18 Q. Okay. I am going to suggest to you that X7 was there, 19 shouting commands at Anthony before he was shot. Do you 20 understand? 21 A. I understand what you are saying, sir. 22 Q. Can we just be clear on this, if somebody was standing 23 by the driver's door, right, from where you were 24 positioned and they were shouting, can you think of any 25 reason why you would not be in a position to hear them?</p> <p style="text-align: center;">Page 188</p>

<p>1 A. No.</p> <p>2 Q. No.</p> <p>3 So shouting commands, the usual commands that you</p> <p>4 would expect?</p> <p>5 A. Yes.</p> <p>6 Q. "Show me your hands", "Don't move", that sort of thing,</p> <p>7 yes?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Right, and just before I continue with the narrative,</p> <p>10 just help the chairman with this. At the time Anthony</p> <p>11 was shot --</p> <p>12 A. Yes, sir.</p> <p>13 Q. -- in what position was his body?</p> <p>14 A. Straight on towards me, sir.</p> <p>15 Q. Straight on towards you. All right.</p> <p>16 You see I am going to suggest that before Anthony</p> <p>17 was shot, X7 is in the position I have described,</p> <p>18 standing by the driver's door and Anthony turns to his</p> <p>19 right, towards X7, and has his hands and puts his hands</p> <p>20 up, do you understand?</p> <p>21 A. I understand what you are saying, sir.</p> <p>22 Q. All right.</p> <p>23 And, just before Anthony is shot, X9, he is the chap</p> <p>24 with the CSD canister, do you follow?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 189</p>	<p>1 A. They start to arrive there, sir, yes.</p> <p>2 Q. There is a point in time when they are there?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Right and you are saying on your account that at no</p> <p>5 point when officers are by those doors does Anthony</p> <p>6 raise his hands?</p> <p>7 A. I did not see Anthony raise his hands when those</p> <p>8 officers were by the door, sir.</p> <p>9 Q. It is not that you did not, you are saying it didn't --</p> <p>10 A. No, it didn't.</p> <p>11 Q. Didn't happen?</p> <p>12 A. Yes.</p> <p>13 THE CHAIRMAN: Let's be clear about this. He can only say,</p> <p>14 can't he, as a matter of common sense that Mr Grainger</p> <p>15 didn't raise his hands to a point where he would be in</p> <p>16 a position to see them, that is to say above the level</p> <p>17 of the dashboard.</p> <p>18 MR THOMAS: Perhaps I can clarify.</p> <p>19 Let me ask you, with this question, you at this</p> <p>20 point in time, after the deployment of the shot, if</p> <p>21 I have understood your evidence, you are watching</p> <p>22 Anthony?</p> <p>23 A. Yes, sir. I have looked at him.</p> <p>24 Q. Right. You are watching him and it is your evidence</p> <p>25 that you are not only watching him, you are telling</p> <p style="text-align: center;">Page 191</p>
<p>1 Q. Breaks the window when he deploys the canister into the</p> <p>2 vehicle. I am going to suggest this is, again on this</p> <p>3 alternative narrative, before Anthony is shot. Do you</p> <p>4 understand?</p> <p>5 A. I understand the narrative you are saying, sir.</p> <p>6 Q. Which causes Anthony to flinch when the glass shatters,</p> <p>7 do you understand?</p> <p>8 A. I understand what you are saying, sir, yes.</p> <p>9 Q. It is at that point, it is at that point Anthony is shot</p> <p>10 and his hands come down? What do you say to that?</p> <p>11 A. Absolutely no chance, sir.</p> <p>12 Q. All right. On your narrative then, just so we are</p> <p>13 clear, you are saying that, as far as you could see, X7</p> <p>14 isn't there?</p> <p>15 A. Correct.</p> <p>16 Q. X9 isn't there?</p> <p>17 A. Correct.</p> <p>18 Q. And on your account, when the officers eventually get to</p> <p>19 the vehicle, as we know they do, we can agree on that?</p> <p>20 A. Yes, sir.</p> <p>21 Q. There comes a point in time after the shot is deployed</p> <p>22 by Q9 --</p> <p>23 A. Yes, sir.</p> <p>24 Q. -- there comes a point in time when officers are by the</p> <p>25 driver's door and the passenger door of the red Audi?</p> <p style="text-align: center;">Page 190</p>	<p>1 officers when they arrive, the man has been shot?</p> <p>2 A. No, sir, that is incorrect, that was later after I had</p> <p>3 scrambled out of the vehicle, I climbed on top of the</p> <p>4 footwell and leaned on top and started shouting towards</p> <p>5 the officers who were there, "He has been shot, he has</p> <p>6 been shot".</p> <p>7 Q. Help me with this, before you scramble out, had the</p> <p>8 officers arrived?</p> <p>9 A. They were beginning to arrive at the vehicle, sir, yes.</p> <p>10 Q. When you got to the top, had they arrived?</p> <p>11 A. Yes, sir, there was officers on the vehicle.</p> <p>12 Q. You see I am going to suggest to you that on this</p> <p>13 alternative narrative, if X7 was there covering Anthony,</p> <p>14 Anthony as a threat would have been covered and</p> <p>15 therefore there would have been no need to for your</p> <p>16 colleague Q9 to have shot him.</p> <p>17 A. On your narrative, sir, yes.</p> <p>18 Q. Yes.</p> <p>19 Just tell me this. From the lighting --</p> <p>20 A. Yes, sir.</p> <p>21 Q. -- was the car park, apart from the lighting that you</p> <p>22 have on the weapon, on Q9's weapon, and Mr Beer has</p> <p>23 already touched on that with you.</p> <p>24 A. Yes, sir.</p> <p>25 Q. Apart from that lighting, without that lighting, was</p> <p style="text-align: center;">Page 192</p>

<p>1 there no ambient light for you to see or could you see?</p> <p>2 A. There was ambient light on the buildings behind. The</p> <p>3 buildings behind had, what do you call it, sort of</p> <p>4 lights along the building line that gives the light on</p> <p>5 to the car park.</p> <p>6 Q. In other words the car park was not in total darkness,</p> <p>7 was it?</p> <p>8 A. No, sir.</p> <p>9 Q. Again, if somebody was standing either by the vehicle on</p> <p>10 the driver's side or the passenger side, there was</p> <p>11 sufficient light for you to see them?</p> <p>12 A. Yes, sir, as we arrived, yes.</p> <p>13 Q. Yes.</p> <p>14 You don't ever see a gun, before the deployment of</p> <p>15 any shot you don't ever see a gun from the subject's</p> <p>16 vehicle?</p> <p>17 A. Correct, sir.</p> <p>18 Q. You learnt later that evening there was no gun in the</p> <p>19 vehicle, correct?</p> <p>20 A. I didn't learn that day, sir, I think it was a few days</p> <p>21 later that I learnt that.</p> <p>22 Q. Well ...</p> <p>23 A. But eventually, yes I learnt there was no weapon in the</p> <p>24 vehicle.</p> <p>25 Q. We can deal with eventually later, but I am talking</p> <p style="text-align: center;">Page 193</p>	<p>1 a gun?"</p> <p>2 A. No, sir.</p> <p>3 Q. Why not?</p> <p>4 A. It is just that is not my place to do that, sir.</p> <p>5 MR THOMAS: Sir, that is all I ask.</p> <p>6 THE CHAIRMAN: Thank you Mr Thomas.</p> <p>7 Mr Weatherby?</p> <p>8 MR WEATHERBY: Yes, sir, please.</p> <p>9 Questions from MR WEATHERBY</p> <p>10 MR WEATHERBY: Officer, I ask questions on behalf of</p> <p>11 Mr Grainger's partner. Three areas from me.</p> <p>12 When Mr Beer was asking you about your statement and</p> <p>13 the omissions and the errors in your first statement,</p> <p>14 you told him that the reason for that was that it took</p> <p>15 six days before you provided that statement, yes?</p> <p>16 A. It wasn't just the fact it was six days, sir, I just</p> <p>17 didn't put those parts in that he discussed.</p> <p>18 Q. Yes, but that was one of the things then that you</p> <p>19 explained it by?</p> <p>20 A. Yes, sir.</p> <p>21 Q. You would agree with me that it was very unfortunate</p> <p>22 that it took six days before a first account was</p> <p>23 provided?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Particularly unfortunate in the light of the fact that</p> <p style="text-align: center;">Page 195</p>
<p>1 about on the night. You as one of the firearms officers</p> <p>2 knew there was no gun in the vehicle?</p> <p>3 A. Not that I recall, because it hadn't been searched at</p> <p>4 that point, sir.</p> <p>5 Q. That would have been one of the very first things that</p> <p>6 would have happened, there would have been a cursory</p> <p>7 search. I mean to say, you just said to us that you</p> <p>8 were in fear of your life, you thought the man may have</p> <p>9 had a weapon.</p> <p>10 A. Yes, sir.</p> <p>11 Q. He had gone down towards his lap?</p> <p>12 A. Yes, sir.</p> <p>13 Q. You went across to the vehicle, didn't you?</p> <p>14 A. Not towards the Audi, sir, I went towards where the</p> <p>15 officers were giving first aid.</p> <p>16 Q. Didn't you tell anybody, "Look, I think there might be</p> <p>17 a weapon in there"?</p> <p>18 A. No, sir. I would expect them to search the vehicle</p> <p>19 anyway.</p> <p>20 Q. Sorry, say again?</p> <p>21 A. I would expect them to do a cursory search of the</p> <p>22 vehicle anyway.</p> <p>23 Q. Of course, of course you would expect them to do</p> <p>24 a cursory search of the vehicle. And didn't you say to</p> <p>25 your colleagues, "Did you see the gun? Did you find</p> <p style="text-align: center;">Page 194</p>	<p>1 you were the only witness on your account, apart from</p> <p>2 Q9 --</p> <p>3 A. Yes, sir.</p> <p>4 Q. -- to actually what happened.</p> <p>5 You then gave some explanation as to why it took six</p> <p>6 days and I just want to drill down with that with you</p> <p>7 a little further if we may.</p> <p>8 A. Of course, sir.</p> <p>9 Q. First of all you said there was a period, a cool down</p> <p>10 period?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Yes, but it is right, isn't it, that before you went off</p> <p>13 duty that night, you ought to have given an initial</p> <p>14 account, a brief initial account setting out your role</p> <p>15 and the essential facts?</p> <p>16 A. No, sir, I was only going off the guidance I was given</p> <p>17 that evening.</p> <p>18 Q. Okay, well can I just read a passage from the manual to</p> <p>19 you. The chair has seen this, so unless I am asked to</p> <p>20 I am not going to turn it up.</p> <p>21 A. Yes, sir.</p> <p>22 Q. It is paragraph 7.96 of the manual.</p> <p>23 It is headed "Stage 3 personal initial accounts":</p> <p>24 "Subject to legal and medical advice, officers</p> <p>25 should provide a personal initial account of the</p> <p style="text-align: center;">Page 196</p>

1 incident before going off duty. Each officer's initial
 2 account should consist only of their individual
 3 recollection of events and should be written, signed and
 4 dated. Detailed accounts will be made later. The
 5 purpose of the personal initial account is to record
 6 their role, what they believed to be the essential facts
 7 and should, where relevant, outline the honestly held
 8 belief that resulted in their use of force."
 9 Then it mentions guidance on conferring, okay?
 10 **A. Yes, sir.**
 11 Q. I am going to suggest to you that before you went off on
 12 duty that night, or 6.00 the following morning, you
 13 ought to have provided an initial account?
 14 **A. What I will say, sir, is I am not aware of that part of**
 15 **the manual of guidance. I was only guided by the people**
 16 **that were there that evening, sir, in relation to the**
 17 **PIM procedure.**
 18 Q. You were not aware of that. Let's move on, you were
 19 guided by people involved in the post --
 20 **A. Incident procedure, sir, yes.**
 21 Q. -- incident procedure. Does it follow from that then
 22 that somebody told you not to provide any account on
 23 that night?
 24 **A. No, sir, I just wasn't asked for one and I took it that**
 25 **that was the case.**

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1 Q. Right. Okay. But in respect of -- you know, as
 2 a seasoned police officer, in respect of any significant
 3 incident, you would want to put a recollection down as
 4 soon as possible, wouldn't you. That would be your
 5 default position, your starting position?
 6 **A. Yes, sir. Yes.**
 7 Q. Yes. Why different here, if nobody had told you not to
 8 do that? Why was your default position here not to
 9 write down an initial account?
 10 **A. Because I was being guided, sir, by the post-incident**
 11 **procedure and we were told that statements would be**
 12 **taken as they were taken, or given.**
 13 Q. You were told that statements would be taken and you
 14 took it from that that you shouldn't record --
 15 **A. That that was a procedure, sir, yes.**
 16 Q. You took it from that, from being told that statements
 17 would be taken later, that you shouldn't record any
 18 account?
 19 **A. Yes, sir.**
 20 Q. Who told you in the post-incident procedure that
 21 a statement would be taken later?
 22 **A. I don't recall exactly who, sir, I know some people were**
 23 **requested to do an initial statement and some of us**
 24 **weren't.**
 25 Q. Yes, okay, but bearing in mind what has already been put

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1 to you about this being the only time in your career
 2 where this has happened, and this is a unique procedure,
 3 are you really not able to help us with who it was told
 4 you that accounts would be taken later rather than at
 5 the moment?
 6 **A. I cannot, sir, no. There were lots of people in there.**
 7 Q. Did you make it clear to the post-incident managers,
 8 your supervisor or anybody that you personally had been
 9 in a position that other officers hadn't been in to be
 10 able to say exactly what had happened?
 11 **A. No, sir.**
 12 Q. Did you make it clear the important position that you
 13 were in?
 14 **A. No, sir.**
 15 Q. Why was that?
 16 **A. Because I didn't want to be accused of colluding, sir,**
 17 **telling people things. Everybody knew what my role was,**
 18 **where I was sat.**
 19 Q. In terms of discussing with other officers, I haven't
 20 asked you anything about that, so in terms of collusion,
 21 I haven't asked you anything about that.
 22 **A. Okay.**
 23 Q. What I am talking about is the people who were not
 24 there, the managers, the supervisory officers, why
 25 didn't you go to one of them -- not colluding, but go to

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1 one of them and say, "Well, actually I was in a position
 2 to see everything that happened close up and so I am in
 3 a unique or an almost unique position to assist here"?
 4 **A. They requested that X7 do that, sir, I was never**
 5 **requested for it and never offered that as such. I just**
 6 **believed I would be making a statement at some point.**
 7 Q. Right, so you didn't think it was important to tell the
 8 managers or the supervisors the position you had been
 9 in?
 10 **A. No, sir, I was just being led by the PIP procedure.**
 11 Q. Then you go off duty and you go past the 24 hours or
 12 48-hour cooling off period.
 13 **A. Yes, sir.**
 14 Q. Then why not either just record an account in your
 15 pocket notebook or contact the post-incident managers or
 16 your line supervisor and say:
 17 "Look, it is now 48 hours later, I am very concerned
 18 that I am in a central position to be able to say
 19 exactly what happened and what did and what didn't
 20 happen, and I think consistent with normal policing
 21 behaviour, protocol and policies I should commit to
 22 writing either in a pocket notebook or on a statement or
 23 somehow, what exactly happened."
 24 **A. Again, sir, we were being led by the PIP procedure,**
 25 **which I followed. I actually did voice my concerns at**

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<p>1 one point to say: how long have we got to wait? I think</p> <p>2 that was on the Wednesday when I returned to work.</p> <p>3 Q. Right, you say you followed the PIP procedure, what do</p> <p>4 you mean by that?</p> <p>5 A. We were told that at some point we would have to make</p> <p>6 a statement, sir, we fully understood that.</p> <p>7 Q. That is before you go off duty on the Saturday</p> <p>8 night/Sunday morning?</p> <p>9 A. Not in relation to making a statement that night, but we</p> <p>10 were told.</p> <p>11 Q. You were told that there would be a statement?</p> <p>12 A. At some point, yes.</p> <p>13 Q. After that, what is your next contact with anybody</p> <p>14 involved in the post-incident or any supervisor?</p> <p>15 A. I believe it was the Wednesday when I returned to work</p> <p>16 I was told I had to go and have a hearing test.</p> <p>17 Q. Right. To do with this?</p> <p>18 A. Yes, sir, because a shot had been fired directly behind</p> <p>19 me, sir.</p> <p>20 Q. Okay, when you went in on the Wednesday, did you say,</p> <p>21 "I am very concerned that it is now several days later,</p> <p>22 it is now four days later, I am very concerned that</p> <p>23 I haven't made an account, should I make an account,</p> <p>24 should I give a statement"?</p> <p>25 A. I believe a few officers were asking in relation to</p> <p style="text-align: center;">Page 201</p>	<p>1 shot he sort of began to go to his left side, as though</p> <p>2 sort of slightly slumped down as his left hand came</p> <p>3 down.</p> <p>4 Q. Right, so he was shot, he slumps to his left-hand side</p> <p>5 towards Mr --</p> <p>6 A. Not immediately, it is sort of gradually.</p> <p>7 Q. He goes towards Mr Totton?</p> <p>8 A. Towards where Mr Totton will have been, yes.</p> <p>9 Q. Yes. How far down does he slump, as far as you say?</p> <p>10 A. I don't recall, it wasn't that far. It wasn't right</p> <p>11 over, but I can't sort of recall how far he sort of</p> <p>12 slumps over to his left, but he did start to slump down</p> <p>13 to his left-hand side.</p> <p>14 Q. Noticeably to his left?</p> <p>15 A. Yes, sir.</p> <p>16 Q. At the same time his left hand came down?</p> <p>17 A. I noticed his left hand coming down, sir, yes.</p> <p>18 Q. That was, on your account, after he had been shot?</p> <p>19 A. Yes, sir, I believe so.</p> <p>20 Q. If it was suggested he had slumped back in his seat for</p> <p>21 example, or if he was slightly forward or slightly</p> <p>22 towards his right-hand side, you would disagree with all</p> <p>23 of that?</p> <p>24 A. I would disagree with that, sir, yes.</p> <p>25 Q. Finally, I want to return to the start, just before, on</p> <p style="text-align: center;">Page 203</p>
<p>1 timelines, sir, when we would be making a statement.</p> <p>2 Q. Did you?</p> <p>3 A. I did request when I would be making a statement, yes.</p> <p>4 Q. Right, and who did you request that to?</p> <p>5 A. I don't recall, sir. It would have been somebody in</p> <p>6 supervision.</p> <p>7 Q. Your line manager?</p> <p>8 A. I don't recall, sir.</p> <p>9 Q. You don't recall?</p> <p>10 A. No.</p> <p>11 Q. Second, and shorter topic, when you say that you saw</p> <p>12 Anthony Grainger shot, you have told Mr Thomas that as</p> <p>13 far as you can recall he was square on to you?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Is that your recollection?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Yes.</p> <p>18 If it was suggested he was turned to his right,</p> <p>19 towards the door, even slightly, you would say that that</p> <p>20 is not right?</p> <p>21 A. Not that I recall, sir, no.</p> <p>22 Q. Yes.</p> <p>23 You have told us that when he was shot, he slumped.</p> <p>24 Can you describe more how you say that he slumped?</p> <p>25 A. Yes, sir. He -- it is hard to explain, but once he was</p> <p style="text-align: center;">Page 202</p>	<p>1 your account, Q9 shot Mr Grainger.</p> <p>2 A. Yes, sir.</p> <p>3 Q. You have told Mr Beer that you made a mistake about the</p> <p>4 ultra dot and what you always meant was the green strobe</p> <p>5 light.</p> <p>6 A. I put "ultra dot" rather than a "strobe".</p> <p>7 Q. Right, so in your first account on the 9th, when you</p> <p>8 refer to ultra dot, you meant the green strobe light?</p> <p>9 A. Yes, I wouldn't have been able to see the ultra dot,</p> <p>10 sir.</p> <p>11 Q. Yes. You say that, looking over at this scene, you</p> <p>12 could see the two front-seated persons, Mr Grainger and</p> <p>13 Mr Totton?</p> <p>14 A. At that point, sir, yes.</p> <p>15 Q. Illuminated by the TAC light?</p> <p>16 A. Yes, sir.</p> <p>17 Q. You say that you saw the strobe light on Mr Totton?</p> <p>18 A. Initially that is where I saw it, sir, yes.</p> <p>19 Q. Initially on Mr Totton and then on Mr Grainger?</p> <p>20 A. Yes, sir.</p> <p>21 Q. And then Mr Grainger is shot?</p> <p>22 A. Yes, sir.</p> <p>23 Q. That is your clear recollection, is it?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Can I just put to you something that Q9 said in his</p> <p style="text-align: center;">Page 204</p>

<p>1 account. I will just read it to you: 2 "As I covered into the vehicle [just for anybody's 3 note, this is the account of 9 March, A/270] I saw the 4 driver make a sudden and deliberate movement of his 5 right hand from my view and down towards his lap. 6 I thought he was reaching for a firearm. I quickly 7 realised that the approaching officers were in extreme 8 danger so I placed my finger on the trigger, illuminated 9 the laser aiming device and fired one round to the 10 centre mass of the driver." 11 A. Yes, sir. 12 Q. Yes. So his account is that he puts the laser device on 13 only when he sees Mr Grainger's hand go down, only when 14 he has placed his finger on the trigger, he then 15 illuminates the device and then shoots Mr Grainger? 16 A. Yes, sir. 17 Q. That is different from your account, isn't it? 18 A. It is, sir, yes. 19 MR WEATHERBY: Yes. 20 One minute, please. 21 Thank you. 22 THE CHAIRMAN: Yes, Mr Davies. 23 Questions from MR DAVIES 24 MR DAVIES: I am asking questions on behalf of Q9. Just on 25 that last point.</p> <p style="text-align: center;">Page 205</p>	<p>1 Q. -- who may or may not have picked up the aggressors' 2 weapon -- 3 A. Yes, sir. 4 Q. -- but obviously knew how to use them -- 5 A. Yes, sir. 6 Q. -- and they have never been caught -- 7 A. Correct, sir. 8 Q. -- or identified -- 9 A. Yes, sir. 10 Q. -- and the CCTV was destroyed? 11 A. Yes, sir. 12 Q. In terms of the differentiation between conviction led 13 briefings, that is to say where you are told someone has 14 been convicted, and intelligence, there would be 15 a threshold wouldn't there for an officer in his mind, 16 as to what quality of intelligence would make it into 17 a briefing to inform their decision making? 18 A. If the intelligence was in a briefing? 19 Q. Yes. 20 A. I would expect it would be quality intelligence, sir, if 21 it was in a briefing. 22 Q. In other words, it has gone through a process of review, 23 such that it is appropriate to use it in a briefing that 24 may inform decision making? 25 A. I would fully expect so, sir, yes.</p> <p style="text-align: center;">Page 207</p>
<p>1 A. Yes, sir. 2 Q. What is the reality of the timescale? 3 A. Seconds. 4 Q. Or fractions of seconds, isn't it? 5 A. Yes, sir, split seconds. 6 Q. I just have a few topics to go through, each of them 7 short. Let's start with the briefing and briefings. In 8 relation to the specific subjects of the briefings on 2 9 and 3 March. 10 A. Yes, sir. 11 Q. You were present at both? 12 A. Yes, sir. 13 Q. You told Mr Beer that you were aware of Mr Totton -- 14 A. Yes, sir. 15 Q. -- as a leading member of one of the, dare I say, many 16 Salford organised crime groups? 17 A. Yes, sir, there are several. 18 Q. He was somebody of sufficient prominence to be made 19 subject to an execution attempt in a public house? 20 A. Yes, sir. 21 Q. Those responsible for the execution attempt were 22 themselves shot dead -- 23 A. Correct, sir. 24 Q. -- by people within that public house -- 25 A. Yes, sir.</p> <p style="text-align: center;">Page 206</p>	<p>1 Q. As opposed to wholly anonymous, uncorroborated phone 2 calls from people who may have an agenda against the 3 subjects of the operation? 4 A. Yes, sir. 5 Q. There is a threshold? 6 A. Yes, sir. 7 Q. Did you treat the intelligence you were being briefed as 8 to in those briefings as accordingly reliable -- 9 A. Yes, sir. 10 Q. -- as an indicator of the ICI of the subjects of this 11 operation? 12 A. Yes, sir. 13 Q. The potential targets for the armed robberies included 14 banks, business premises and places like that you said? 15 A. Yes, sir. 16 Q. It specifically, didn't it, included Sainsbury's? 17 A. Yes, sir. 18 Q. The strong room at Sainsbury's as accessed through the 19 rear? 20 A. Yes, sir. 21 Q. Something you had taken into account on your own visit 22 I think on 1 March? 23 A. Yes, sir. 24 Q. In your mind, as at broadly closing time for Sainsbury's 25 on Saturday night, it remained a valid target for armed</p> <p style="text-align: center;">Page 208</p>

1 robbery?
 2 **A. Yes, sir.**
 3 Q. Yes.
 4 You had been asked questions as to the language of
 5 "armed robbery" in the briefing?
 6 **A. Yes, sir.**
 7 Q. You have said that it could be used to describe the use
 8 of any weapon to commit robbery, not simply firearms?
 9 **A. Yes, sir.**
 10 Q. Was there anything in the briefings on 2 and 3 March
 11 that excluded firearms from the range of weaponry these
 12 subjects may use?
 13 **A. I don't believe so, sir.**
 14 Q. No. What level of weaponry do you think would have been
 15 required to secure access to the strong room at
 16 Sainsbury's?
 17 **A. Without looking at the strong room itself, sir,**
 18 **I couldn't say, but it could be anything.**
 19 Q. Up to and including a firearm?
 20 **A. Yes, up to and including.**
 21 Q. People don't argue with a firearm, do they?
 22 **A. No, sir.**
 23 Q. They may or may not offer more resistance to lesser
 24 forms of weapon?
 25 **A. Yes, sir.**

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1 Q. What would it have done to your threat assessment if you
 2 had been told that it wasn't Mr Rimmer but some unknown
 3 male associating with Mr Totton, given his status within
 4 Salford?
 5 **A. None at all, sir, on that individual themselves, the**
 6 **unknown, none at all, sir.**
 7 Q. In terms of the group as a whole?
 8 **A. Again, none at all, sir.**
 9 Q. Were you treating the group as a whole as a set of
 10 individuals, as was briefed, with the capability and
 11 intent to commit armed robbery?
 12 **A. Yes, sir.**
 13 Q. Including with firearms?
 14 **A. Yes, sir.**
 15 Q. The next topic is the approach to the car park once you
 16 have gone to State Amber.
 17 **A. Yes, sir.**
 18 Q. The decision by Q9 to offer cover once you had T-boned
 19 the subject vehicle, if I put it in very short form --
 20 **A. Yes, sir.**
 21 Q. -- that was a CTSFO-trained technique?
 22 **A. It was a CT style technique, sir, but it also provided**
 23 **immediate cover to the team, so although we train in**
 24 **certain tactics, we can step outside that framework if**
 25 **we believe tactically it would give us an advantage.**

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1 Q. Even without the London based CT training, it would have
 2 been within the dynamic tactics you used --
 3 **A. Because of the position of the vehicle, sir, yes.**
 4 Q. Because of the position of the vehicle.
 5 It is a basic principle that officers generally
 6 don't run between the police vehicles and the subject
 7 vehicle?
 8 **A. Correct, sir.**
 9 Q. Although it is not absolutely prohibited.
 10 Bearing in mind you were going to, and did, T-bone
 11 the subject vehicle --
 12 **A. Yes, sir.**
 13 Q. -- what cover would you have had, what cover would any
 14 officer have had, if Q9 had not offered cover through
 15 that front windscreen as he did?
 16 **A. None, sir.**
 17 Q. It is an obvious tactic, isn't it, to provide cover
 18 until officers have deployed to the near and offside of
 19 the subject vehicle?
 20 **A. It is a basic tactic, sir, to provide cover to other**
 21 **officers.**
 22 Q. It is the quickest and most immediate way to achieve
 23 control over the subjects in the vehicle?
 24 **A. Yes, sir.**
 25 Q. To discourage them from engaging in using their own

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1 firearms, if they have them?
 2 **A. Yes, and for them not to be aware you are there until**
 3 **the last second, sir.**
 4 Q. You said there was no contact that you were aware of
 5 between the alpha vehicle as you pulled it up and the
 6 subject vehicle that you parked it right next to?
 7 **A. Correct, sir.**
 8 Q. Can you say precisely when X7 or anyone else got out of
 9 your vehicle, relative to it stopping?
 10 **A. No, sir.**
 11 Q. Again, in reality, the distinction between them getting
 12 out of the vehicle as it is stopping and it having
 13 stopped is going to be measured in fractions of
 14 a second, isn't it?
 15 **A. Yes, sir.**
 16 Q. You have given evidence that having stopped, and
 17 notwithstanding Q9's cover, you felt, in your words,
 18 vulnerable?
 19 **A. Yes, sir.**
 20 Q. Vulnerable to what?
 21 **A. Vulnerable to the vehicle, sir. The subject vehicle.**
 22 Q. And to those within it?
 23 **A. Yes, sir.**
 24 Q. What was the threat from those within it as opposed to
 25 the vehicle itself being used as a weapon?

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<p>1 A. They are both threats, sir. The vehicle itself is 2 a threat and it's my responsibility as a driver to try 3 and hold that vehicle there. But the vehicle was 4 a threat, as well as the people within that vehicle. 5 Q. The people within it are a threat because? 6 A. Well because the intelligence information that we had 7 received that they would possibly be committing an armed 8 robbery, sir. 9 Q. They may have had firearms? 10 A. Yes, sir. 11 Q. That was the vulnerability, wasn't it? 12 A. Yes, sir. 13 Q. You, as the driver, of course, common sense, although 14 you have a firearm and a Taser, you are in a small space 15 with a steering wheel? 16 A. Yes, sir. 17 Q. For you to engage and deploy your weapon has the 18 problems you already described? 19 A. It does, sir. We actively discourage drivers from doing 20 it. 21 Q. Because you are manoeuvring within a small space with 22 a live firearm? 23 A. Yes, sir, and on training somebody tried to do it and 24 hit the wall of the range, sir, so we would discourage 25 drivers from trying to get their firearm out, sir.</p> <p style="text-align: center;">Page 213</p>	<p>1 Q9 shot? 2 A. No, sir. 3 Q. On the other hand you are looking towards, as it turned 4 out, Mr Grainger. Did know it was him as distinct from 5 other subjects? 6 A. No, sir. 7 Q. Did you recognise him from the briefing photographs? 8 A. No, sir. 9 Q. If X7 had been standing right next to his window when Q9 10 discharged his shot, you would have seen him there, 11 wouldn't you? 12 A. Yes, sir. 13 Q. He wasn't there, was he? 14 A. No, sir. 15 Q. There hadn't actually been time for him to get there, 16 had there? 17 A. Definitely not, sir, no. 18 Q. Looking at your first statement, tab 1, I just want to 19 see if I have this right, page 4 of 5, first two 20 paragraphs. 21 A. Page what, sorry, sir? 22 Q. Page 4 of 5, page 94 in the top. 23 A. Yes, sir. 24 Q. If I have understood you correctly from these first two 25 paragraphs, the point at which you begin to scramble is</p> <p style="text-align: center;">Page 215</p>
<p>1 Q. Further to that, you have to remain viable as the driver 2 of the vehicle, don't you? 3 A. Yes, sir. 4 Q. There are a number of reasons, in other words, why you 5 would not be the person within the vehicle engaging your 6 firearm? 7 A. Yes, sir. 8 Q. Although you could use it once you had got out? 9 A. Once I had got out of the vehicle itself, sir, yes. 10 Q. Where different considerations may arise. 11 Once you had pulled up and feeling vulnerable as you 12 were, where was your line of vision, what were you 13 concentrating on? 14 A. Just concentrating on the windscreen of the vehicle, 15 sir, the people that were there. 16 Q. Which presumably was to your right -- 17 A. Just slightly. 18 Q. -- we have the photographs, we need not go to them. 19 Anybody approaching the nearside of the subject 20 vehicle, of course, would be basically to your behind? 21 A. Yes, sir. 22 Q. Did you look behind to see where any such person was 23 positioned before Q9 shot? 24 A. No, sir. 25 Q. Can you say where any such person would have been when</p> <p style="text-align: center;">Page 214</p>	<p>1 essentially when you see Mr Grainger slump? 2 A. Yes, sir, starting to slump. 3 Q. Then you somehow have to get your legs out of the 4 vehicle, stand up in the footwell of the nearside of 5 your vehicle and everything else you see is from that 6 position? 7 A. Yes, sir. 8 Q. Including the deployment of officers around the subject 9 vehicle, CSDC and all the rest? 10 A. As I am looking to my right, sir, following the shot, as 11 soon as I start to see officers closing in on that, that 12 is when I decide to scramble out of the vehicle, sir. 13 Q. Then there is a gap obviously as you turn to get out, or 14 up. Then you have a new sight of what is happening then 15 around the vehicle? 16 A. I was over the top of the roof of our vehicle, sir, 17 looking down, two officers deploying into the vehicle, 18 sir. 19 Q. The last thing you see as you start to scramble out, no 20 doubt quite a tricky move, is officers coming right 21 round the vehicle, almost immediately after the shot, 22 you scramble out, stand up and then you are taking in 23 the scene from a standing position? 24 A. Yes, sir. 25 Q. There is going to be a gap for the scramble time, isn't</p> <p style="text-align: center;">Page 216</p>

<p>1 there in terms of events? 2 A. Yes, sir. 3 MR DAVIES: All right. 4 That is all I ask, thank you. 5 MR EVANS: No thank you, sir. 6 THE CHAIRMAN: Anything else, Mr Beer? 7 MR BEER: Just two questions, please. 8 Further questions from MR BEER 9 MR BEER: If static cover from within the alpha vehicle is 10 the most basic and obvious tactic to give protection to 11 you and your colleagues -- 12 A. Yes, sir. 13 Q. -- why is it not taught as the most basic and obvious 14 tactic to be used all of the time? 15 A. It is to do with the vehicle positioning, sir, and where 16 the vehicle was. If the vehicle had been in the middle 17 of the car park then we would have positioned the 18 vehicles differently and somebody else would have been 19 put in covering, sir. 20 Q. Are you saying that where you T-bone a car like this, it 21 is the preferred tactic? 22 A. What I am saying is the vehicle was T-boned because of 23 the position it was parked in in the car park. If it 24 was further down the car park, then we may well have 25 used a slightly different sort of vehicle strike as</p> <p style="text-align: center;">Page 217</p>	<p>1 Q. Was that the subject of discussion? 2 A. I don't recall it being the subject of discussion, but 3 as the driver that is not the way I would take the team 4 into it. 5 Q. Second question, Mr Davies put to you that at the time 6 of Q9's shot, X7 was definitely not on the offside 7 window of the subject vehicle? 8 A. Yes, sir. 9 Q. You agreed? 10 A. Yes, sir. 11 Q. On the case that Mr Davies is putting, at the point of 12 Q9's shot being fired, X7 was not at any risk of being 13 shot through the side door or the side window of the 14 stolen Audi, because he wasn't there? 15 A. Correct, sir. 16 MR BEER: Thank you very much. 17 THE CHAIRMAN: Thank you. 18 That is the end of your evidence, W4. Thank you for 19 helping the Inquiry, you are now free to go. 20 If you would like to just remain there for a moment, 21 the usher will come and escort you away. 22 (The witness withdrew) 23 Housekeeping 24 MR BEER: Sir, thank you for sitting slightly late today to 25 complete this witness.</p> <p style="text-align: center;">Page 219</p>
<p>1 such. 2 Q. I am not following for the moment. Are you saying it is 3 because the vehicle was in the end car park space? 4 A. The end bay, sir, yes. So there was nowhere else for 5 other vehicles to go, sir. 6 Q. So there was? 7 A. Nowhere else for other vehicles to go. 8 Q. Why does that make static cover from Q9 in the rear the 9 most obvious thing to do? 10 A. Because he is the first person that will be able to put 11 cover on to that vehicle, sir. 12 Q. Was there a discussion about whether a head-on approach 13 through the exit gate of the car park or a combination 14 of an entrance through the exit gate and through the 15 proper entrance of the car park should occur? 16 A. I don't recall the discussion, sir. But I certainly 17 wouldn't advocate coming in from directly opposite where 18 the subjects were. 19 Q. Why is that? 20 A. Because then you are on show, you have lost the element 21 of surprise, you have given them a reaction time. So 22 no, sir, I wouldn't do that. 23 Q. What about from behind the row of cars that was down the 24 middle of the car park? 25 A. Again --</p> <p style="text-align: center;">Page 218</p>	<p>1 THE CHAIRMAN: That is all right. It has been a long day, 2 from shortly after 10.00 until 4.55. I am prepared to 3 start at 10.00 tomorrow, I think we need to get as much 4 time in tomorrow as we can. 5 MR BEER: We do, sir, that is right. It probably won't be 6 the case that we will be asking you to do the same on 7 Wednesday and Thursday. 8 THE CHAIRMAN: Good. Thank you. 9 10.00 tomorrow. 10 (4.55 pm) 11 (The Inquiry adjourned until 10.00 am the following day)</p> <p style="text-align: center;">Page 220</p>

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