

<p>1 Tuesday, 11 April 2017 2 (10.04 am) 3 THE CHAIRMAN: X7? 4 MR BEER: Yes, please, sir. 5 THE CHAIRMAN: Thank you. 6 X7. 7 X7 (sworn) 8 THE CHAIRMAN: Thank you, X7. Would you mind remaining 9 standing please so that those who are entitled to can 10 see you and we can all hear you. You will also be asked 11 to deal with a number of files and folders in the course 12 of the morning, you will find it much easier if you are 13 right in front of that little desk there. 14 Questions from MR BEER 15 MR BEER: X7, my name is Jason Beer and I ask questions on 16 behalf of the Inquiry. To your left-hand side there 17 should be a cypher key. Can you use that when 18 appropriate, please? 19 <b>A. Yes.</b> 20 Q. In the folder in front of you there are a series of 21 witness statements, can we go through those to start 22 with, please. If you open it at tab 10. 23 <b>A. Yes, sir.</b> 24 Q. At tab 10 there is a handwritten document with a plan at 25 the back of it. Is that an account that you gave on the</p> <p style="text-align: center;">Page 1</p>	<p>1 <b>A. Yes, sir.</b> 2 Q. Then, lastly, at tab 8, a witness statement dated 3 19 March this year, your second witness statement of 4 that date? 5 <b>A. Yes, sir.</b> 6 Q. I think those ten witness statements, are the contents 7 of those true to the best of your knowledge and belief? 8 <b>A. Yes, sir.</b> 9 Q. Thank you. When did you first become a police officer? 10 <b>A. In 1989.</b> 11 Q. When did you first become an AFO? 12 <b>A. I qualified in 2001, January 2001.</b> 13 THE CHAIRMAN: January 2001? 14 <b>A. Yes, sir.</b> 15 MR BEER: If you just keep your voice up. There are some 16 people at the back of the court who are the other side 17 of the curtain and they are behind a glass screen as 18 well, so if you just keep your voice up. 19 What was your rank in March 2012? 20 <b>A. I was a sergeant.</b> 21 Q. Does that remain the case now? 22 <b>A. Yes, sir.</b> 23 Q. What role were you performing in March 2012? 24 <b>A. I was in -- attached to the tactical operations unit.</b> 25 Q. You were in the --</p> <p style="text-align: center;">Page 3</p>
<p>1 night of 3 March into the morning of 4 March 2012? 2 <b>A. It is, sir, yes.</b> 3 Q. Thank you. 4 If we go back to tab 1, please, is there a witness 5 statement in your name of 9 March 2012? 6 <b>A. Yes, sir.</b> 7 Q. In tab 2, is there a witness statement in your name of 8 28 June 2012? 9 <b>A. Yes, sir.</b> 10 Q. At tab 3, a witness statement in your name of 11 21 January 2013? 12 <b>A. Yes, sir.</b> 13 Q. At tab 4, a witness statement in your name of 14 30 July 2014? 15 <b>A. Yes, sir.</b> 16 Q. Tab 5, a witness statement dated 3 October 2014? 17 <b>A. Yes, sir.</b> 18 Q. Tab 6, a witness statement in your name of 19 24 October 2014? 20 <b>A. Yes, sir.</b> 21 Q. Then there should be an insertion, tab 6A, a witness 22 statement in your name dated 14 January 2015? 23 <b>A. Yes, sir.</b> 24 Q. Tab 7, please, the first of your witness statements 25 dated 19 March this year?</p> <p style="text-align: center;">Page 2</p>	<p>1 <b>A. I was in the operations office, sir.</b> 2 Q. In the operations office of the Tactical Firearms Unit? 3 <b>A. That's correct, sir. Yes.</b> 4 Q. Were you qualified to undertake an operation that was 5 using the MASTS platform? 6 <b>A. I was, sir, yes.</b> 7 Q. When did you first become qualified in MASTS? 8 <b>A. I believe it was in 2003.</b> 9 Q. About nine years or so -- 10 <b>A. Yes, sir.</b> 11 Q. I think one of your statements says May 2003, so nearly 12 nine years or so -- 13 <b>A. Yes.</b> 14 Q. -- at the point of this operation? 15 <b>A. Yes.</b> 16 Q. Did you undertake periodic refresher training after that 17 time? 18 <b>A. I did, sir.</b> 19 Q. I think proximately to March 2012 the MASTS refresher 20 courses that the EFire system shows you to have attended 21 were on 17 March 2011 and 24 November 2011; you 22 understand? 23 <b>A. Yes, sir.</b> 24 Q. We can look at those if anyone wants to but I won't, to 25 try and save time.</p> <p style="text-align: center;">Page 4</p>

1 It has been said by some experts that have looked at  
 2 your training record in this case that in relation to  
 3 OFC work, as an operational firearms commander, you  
 4 became operationally competent in that in 2009. Is that  
 5 right?  
 6 **A. I believe so, sir, yes.**  
 7 Q. You performed that role after 2009 up to and including  
 8 March 2012?  
 9 **A. Yes, sir.**  
 10 Q. It has also been said that based on the records of your  
 11 subsequent training, although you were an experienced  
 12 OFC, that you do not appear to have attended your  
 13 mandatory NPIA national command refresher training in  
 14 2011.  
 15 **A. I did attend the training, sir.**  
 16 Q. It is said that that meant that you weren't  
 17 occupationally competent at the time of the incident;  
 18 you disagree with that?  
 19 **A. I don't necessarily disagree with it, sir, but I did**  
 20 **attend the training.**  
 21 Q. Right. You attended the day, but didn't stay all day.  
 22 Is that right?  
 23 **A. That's correct, sir, yes.**  
 24 Q. I think this is addressed in tab 6A. Is this the  
 25 witness statement that addresses the attendance on the

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1 training that we are talking about as an OFC?  
 2 **A. Yes, sir.**  
 3 Q. In the third paragraph from the bottom, it is said, or  
 4 you say:  
 5 "Although I did attend the course, just prior to  
 6 lunchtime I received an urgent telephone call regarding  
 7 a risk assessment for an ongoing MASTS operation.  
 8 I left the training early and attended the risk  
 9 assessment meeting at 12 noon."  
 10 Then you were on the MASTS operation for the rest of  
 11 the day?  
 12 **A. That's correct.**  
 13 Q. It was due to be a full day's course; is that right?  
 14 **A. I believe so, sir, yes.**  
 15 Q. Can you remember what time it started?  
 16 **A. Not off the top of my head.**  
 17 Q. You said in answer to a question I asked a moment ago  
 18 that you don't necessarily disagree with the suggestion  
 19 that you weren't occupationally competent at the time of  
 20 the incident. Why do you not necessarily disagree with  
 21 that?  
 22 **A. Obviously this matter was pointed out to me, I have**  
 23 **read, gone through the manual of guidance and**  
 24 **I understand clearly it states that you should attend**  
 25 **a full-day refresher course, which I clearly didn't.**

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1 Q. Right. The course that you attended, was it a pass or  
 2 fail course?  
 3 **A. No, sir, I don't believe so.**  
 4 Q. I think you attended an SFO course in the latter part of  
 5 2011; is that right?  
 6 **A. Yes, sir.**  
 7 Q. Was that in the Metropolitan Police area?  
 8 **A. In when, sir?**  
 9 Q. In 2011?  
 10 **A. Yes, sir, in the beginning of 2011, that's correct, yes.**  
 11 Q. It was the beginning of 2011, I see.  
 12 **A. Yes.**  
 13 Q. You were unsuccessful on that course; is that right?  
 14 **A. Yes, sir.**  
 15 Q. Can you remember the reason for your lack of success?  
 16 **A. Yes. I attended the Metropolitan course, I was never**  
 17 **going to complete the course, it was never my intention**  
 18 **I was a qualified SFO at the time. The intention was to**  
 19 **go and just complete the CQC module of that course.**  
 20 Q. Just explain to the chairman what the CQC module is?  
 21 **A. It is the close quarter combat. It is basically room**  
 22 **entry drills, hostage rescue, special munitions,**  
 23 **pyrotechnics, that sort of thing.**  
 24 Q. Why was it never your intention to complete the course?  
 25 **A. I could never complete the course, I had commitments**

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1 **towards the end the course so it was never my intention**  
 2 **to do it in its entirety.**  
 3 Q. You were going to attempt to complete the CQC element of  
 4 it?  
 5 **A. That's correct, sir. I was a qualified SFO at the time**  
 6 **and if I had completed the live fire module it would**  
 7 **have qualified me to a counter terrorist SFO.**  
 8 Q. Can you remember why you were not successful on that  
 9 module?  
 10 **A. Only from what the verbal feedback from the training**  
 11 **staff were is that they hadn't seen enough of me, they**  
 12 **were not happy to pass me at that time.**  
 13 Q. Did you attend an MPS SFO course that was due to run  
 14 between 16 January 2012 and 16 March 2012?  
 15 **A. Sorry, sir, I thought that was the one we were referring**  
 16 **to.**  
 17 Q. Ah no, I was talking about an earlier attendance?  
 18 **A. Yes, sir. The earlier one was run by GMP, not the**  
 19 **Metropolitan Police. That was a week's upskill course**  
 20 **obviously to convert me from an SFO to a CTSFO.**  
 21 Q. Right, and were you successful on that?  
 22 **A. No, sir, I wasn't.**  
 23 Q. What was the reason for the lack of success on that?  
 24 **A. A variety of things, sir. I mean I haven't read the**  
 25 **feedback but I just didn't reach the required standard.**

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1 Q. We have the feedback, I am not going to go through it.  
 2 For your note, sir, it is at X/449.  
 3 THE CHAIRMAN: Yes.  
 4 MR BEER: The Met Police course, the January to March one,  
 5 you attended I think until 14 February.  
 6 **A. Yes, sir.**  
 7 Q. When you were notified that you were being returned to  
 8 force early, ie before the end of the course?  
 9 **A. Yes, sir.**  
 10 Q. Were you told then your reasons for being returned to  
 11 force early?  
 12 **A. It is as I said earlier, obviously, we were --**  
 13 Q. Talking at cross purposes?  
 14 **A. Yes. So, yes, I just didn't -- they hadn't seen enough**  
 15 **of me, they were not prepared to qualify me for the**  
 16 **CTSFO role.**  
 17 Q. Were you given anything to take back to GMP, anything  
 18 physically to return to GMP?  
 19 **A. Not as I recall, sir, no.**  
 20 Q. We have some packages of course notes. You were not  
 21 given a package of course notes?  
 22 **A. I am pretty sure I wasn't, sir, no.**  
 23 Q. I think it is unlikely because we have some email  
 24 traffic that suggests one of your colleagues, Z15, was  
 25 given your notes as well to bring back, subsequently.

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1 Were you given any message to convey back to GMP  
 2 about the reasons for your lack of success?  
 3 **A. No, sir.**  
 4 Q. What implications did you understand there may be from  
 5 your failure to pass the course?  
 6 **A. Simply that I couldn't act as an operative in a hostage**  
 7 **rescue situation.**  
 8 Q. If you just keep your voice up --  
 9 **A. I apologise.**  
 10 Q. -- please.  
 11 You wouldn't be qualified as a CTSFO officer?  
 12 **A. That's correct, sir, yes.**  
 13 Q. Did you understand whether it carried any implications  
 14 for you continuing to be an AFO?  
 15 **A. I -- no, sir.**  
 16 Q. Did you understand whether it carried any implications  
 17 for you to continue as a member of the ops team?  
 18 **A. Yes, sir. I was fully aware when I attended that course**  
 19 **that if I didn't pass it it was a realistic probability**  
 20 **that I would be leaving the operations team, yes.**  
 21 Q. Why would there be a realistic probability that you  
 22 would be leaving the operations team?  
 23 **A. Because the criteria to be in the operations team was to**  
 24 **be a CTSFO, and I couldn't achieve that standard.**  
 25 Q. Do I understand from that that it didn't mean that you

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1 were any less skilled to be carrying out the job that  
 2 you were carrying out?  
 3 **A. Absolutely, sir, I didn't lose any accreditation for any**  
 4 **of my other courses.**  
 5 Q. But that there was a desire within GMP that those within  
 6 the ops team should all be qualified to CTSFO level?  
 7 **A. That's correct, sir. That was the criteria, yes.**  
 8 Q. In particular, in your position as an OFC, you wouldn't  
 9 be able to command CTSFO officers if you weren't a CTSFO  
 10 qualified officer yourself?  
 11 **A. That is not the case. I couldn't participate in any**  
 12 **roles which required CTSFO, sir, that is the case.**  
 13 Q. I see.  
 14 Can I fast forward to the events after the death of  
 15 Mr Grainger --  
 16 **A. Yes, sir.**  
 17 Q. -- to see what happened when the contents of the course  
 18 notes were examined by senior managers within GMP --  
 19 **A. Okay.**  
 20 Q. -- and what they did about them, please. Can we look,  
 21 please, at tab 12 of your bundle.  
 22 If you look at the second email there, the one on  
 23 page 16, can you see an email dated 15 March 2012 --  
 24 **A. Yes, sir.**  
 25 Q. -- from Inspector Williams, the chief firearms

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1 instructor, to Chief Inspector Lawler?  
 2 **A. Yes, sir.**  
 3 Q. What role would Chief Inspector Lawler have been  
 4 performing at this time?  
 5 **A. He was head of the department.**  
 6 Q. "The department" meaning the operations department?  
 7 **A. The TFU as whole.**  
 8 Q. The TFU as a whole, thank you.  
 9 This is after the event, after Mr Grainger's death.  
 10 **A. Yes.**  
 11 Q. He says:  
 12 "Sir, I have reviewed the feedback sheets concerning  
 13 [your] recent attendance at the MPS SFO, in particular  
 14 the CQC element course and this culminating with  
 15 a failure. This was his second attempt at the course.  
 16 As is stated in the standard operating procedure, this  
 17 second attempt was at the discretion of the chief  
 18 firearms instructor and was based upon X7 having shown  
 19 evidence of development during the first course.  
 20 "Having read the feedback from [that's the name of  
 21 a Met Police officer] there is evidence to show that you  
 22 have failed to develop through the CQC element and has  
 23 consequently failed the summative section of the  
 24 assessment process. This is his second failure in the  
 25 tactic and as such, in accordance with part of the SOP,

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<p>1 he is now designated as no further training in this 2 tactic. As discussed with [that is Inspector Nutter, 3 J3, his name has since been revealed] I am content to 4 step outside of the standard operating procedure and let 5 you know of this decision by yourselves. Once done 6 please let me know and I'll arrange for his records to 7 be updated accordingly.</p> <p>8 "I feel it is only fair to note that the feedback 9 from the MPS clearly shows that X7 has worked extremely 10 hard during this course and the failure is in no way 11 from any lack of effort or enthusiasm on his part. 12 I would add however that from reading the feedback, my 13 interpretation is that X7 has become 'overloaded' when 14 under pressure and that this has had an effect on his 15 decision-making process." 16 Yes? 17 <b>A. Yes, sir.</b> 18 Q. The two conclusions at the end, that you worked 19 extremely hard at the course and the failure wasn't 20 because of lack of effort or enthusiasm, but that you 21 had become overloaded when under pressure and that that 22 had had an effect on your decision-making process. Do 23 you agree that they are fair reflections of what 24 happened on the course? 25 <b>A. It is not for me to qualify somebody else's opinion,</b></p> <p style="text-align: center;">Page 13</p>	<p>1 the TFU? 2 <b>A. I am not aware of any, sir, no.</b> 3 Q. You have no idea what he is referring to there by the 4 number of different issues? 5 <b>A. No, sir.</b> 6 Q. In the event, you were moved from the TFU to an ARV 7 team. Is that right? 8 <b>A. Yes, sir.</b> 9 Q. Do you know why that was? 10 <b>A. I was informed by Mr Nutter that obviously I couldn't --</b> 11 <b>I couldn't continue in that role for the long term, and</b> 12 <b>I felt it was right, bearing in mind what had happened,</b> 13 <b>that that was a suitable move.</b> 14 Q. The "what had happened", was that the course or the 15 death of Mr Grainger? 16 <b>A. Perhaps a combination of both, sir.</b> 17 Q. Why did the events of 3 March contribute towards that 18 decision? 19 <b>A. I think it is fair to say, sir, as an experienced AFO,</b> 20 <b>I knew that the scrutiny that you would be placed under</b> 21 <b>from such an incident. And I think it was right to move</b> 22 <b>to the ARV teams.</b> 23 Q. If you can expand on that. We each may take something 24 different from what you are saying there and I want to 25 understand fully what you mean, that you knew as</p> <p style="text-align: center;">Page 15</p>
<p>1 <b>sir, but I don't necessarily agree with it.</b> 2 Q. Which parts do you not agree with? 3 <b>A. The "overloaded when working under pressure", sir,</b> 4 <b>I don't necessarily agree with that.</b> 5 Q. And why not? 6 <b>A. Because I don't think it is fair; I just don't think it</b> 7 <b>is correct.</b> 8 Q. And why not? 9 <b>A. Because I feel I handle pressure very, very well, sir,</b> 10 <b>and I have displayed that throughout the years whilst</b> 11 <b>being an AFO.</b> 12 Q. If we go back a page to page 15, the first email in the 13 tab, Chief Inspector Lawler replies on the same day, 14 15 March, thanking Inspector Williams for his prompt 15 review of your performance. In the second paragraph he 16 says: 17 "Myself and Inspector Nutter will deal with this 18 matter, as there are a number of different issues in 19 relation to X7 which need to be dealt with." 20 Can you help us as to what the "number of different 21 issues" refers to? 22 <b>A. I have no idea, sir.</b> 23 Q. Other than the failure on the course, were there any 24 other different issues that needed to be dealt with 25 concerning your suitability to continue as a member of</p> <p style="text-align: center;">Page 14</p>	<p>1 an experienced officer that your conduct would be 2 examined closely? 3 <b>A. Absolutely, yes.</b> 4 Q. But why would that cause you to move off the unit into 5 the ARVs? 6 <b>A. It is a different type of pressure, I would say, sir.</b> 7 <b>Dealing with pre-planned operations at the higher end,</b> 8 <b>shall we say, of -- that sort of thing. Whereas the ARV</b> 9 <b>is a totally different sort of ball game, if you like.</b> 10 Q. By March 2012, how many MASTS operations do you think 11 you had been involved in, so where MASTS had been the 12 selected operational choice of the SFC and TFC? 13 <b>A. Quite a few, sir. Possibly up to 100. It would be very</b> 14 <b>difficult to say.</b> 15 Q. Okay. 16 Of those possibly up to 100, bearing in mind that 17 you obviously don't keep a tally of these things -- 18 <b>A. No, sir.</b> 19 Q. -- how many had resulted in some form of decisive 20 action? 21 <b>A. I would say probably around the 20 mark.</b> 22 Q. Of those, how many had you been the OFC in? 23 <b>A. Probably about 10 to a dozen, something in that range.</b> 24 Q. Of the 20 or so that had resulted in decisive action, 25 how many had involved the deployment of special</p> <p style="text-align: center;">Page 16</p>

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<p>1 munitions?</p> <p>2 <b>A. Probably 6 out of the 10, 60 per cent of the time</b></p> <p>3 <b>I would say.</b></p> <p>4 THE CHAIRMAN: 6 out of the 10 of which you were OFC, is</p> <p>5 that?</p> <p>6 <b>A. Yes, sir.</b></p> <p>7 THE CHAIRMAN: Right.</p> <p>8 MR BEER: Which special munitions?</p> <p>9 <b>A. Sometimes it was one -- sometimes it was CSDC, sometimes</b></p> <p>10 <b>it was a shotgun and CSDC, a combination of both, it</b></p> <p>11 <b>varied, sir.</b></p> <p>12 Q. Was it usual for special munitions to be authorised for</p> <p>13 use as part of a MASTS deployment?</p> <p>14 <b>A. It wasn't a given, it was something that we had to ask</b></p> <p>15 <b>for, and it was obviously down to the tactical firearms</b></p> <p>16 <b>commander. If they deemed it right and necessary, then</b></p> <p>17 <b>they would seek authority for that.</b></p> <p>18 Q. Although it wasn't a given, was it usual for it to in</p> <p>19 fact be given?</p> <p>20 <b>A. I would say in the vast majority of times, yes, that is</b></p> <p>21 <b>the case.</b></p> <p>22 Q. By 1 March 2012 did you have any previous knowledge of</p> <p>23 Mr Grainger, Anthony Grainger?</p> <p>24 <b>A. I didn't think I had, sir, until recently. When I have</b></p> <p>25 <b>realised that he was part and parcel of Operation</b></p> <p style="text-align: center;">Page 17</p>	<p>1 Q. You just heard his name mentioned in police circles?</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. Before 1 March, had you been deployed on or involved in</p> <p>4 Operation Shire in any way to your knowledge?</p> <p>5 <b>A. Not as far as I am aware, sir, no.</b></p> <p>6 Q. Your first involvement was on 1 March, and I think it</p> <p>7 was as a result of a telephone conversation with DI</p> <p>8 Robert Cousen --</p> <p>9 <b>A. Yes, sir.</b></p> <p>10 Q. -- that you attended Culcheth?</p> <p>11 <b>A. Yes, sir.</b></p> <p>12 Q. Can you recall what DI Cousen told you?</p> <p>13 <b>A. No, sir.</b></p> <p>14 Q. Okay. I don't think you have a note of it, have you?</p> <p>15 <b>A. No, sir.</b></p> <p>16 Q. Is it right that OFCs don't have a dedicated log in the</p> <p>17 same way as the TAC adviser, the TFC and the SFC?</p> <p>18 <b>A. That's correct, sir.</b></p> <p>19 Q. Do you know why that is?</p> <p>20 <b>A. It has just never been the case, sir, it has just never</b></p> <p>21 <b>seemed necessary.</b></p> <p>22 Q. Right.</p> <p>23 But DI Cousen spoke to you on the telephone and told</p> <p>24 you something that caused you to go to Culcheth?</p> <p>25 <b>A. That's correct.</b></p> <p style="text-align: center;">Page 19</p>
<p>1 <b>Blythe, which I was involved in.</b></p> <p>2 Q. Is this the position, when you became involved in Shire</p> <p>3 on 1, 2 and 3 March, one of the subjects was</p> <p>4 Anthony Grainger, at that time you didn't make the</p> <p>5 connection between you I think being a TAC adviser or</p> <p>6 a planner, on Operation Blythe. Is that right?</p> <p>7 <b>A. That's correct, sir.</b></p> <p>8 THE CHAIRMAN: Something that has only come to light since?</p> <p>9 <b>A. Yes, sir.</b></p> <p>10 MR BEER: Were you a TAC adviser or a planner on Op Blythe?</p> <p>11 <b>A. I vaguely remember Operation Blythe, sir. I know what</b></p> <p>12 <b>it was about. I don't remember my role within that</b></p> <p>13 <b>operation, sir.</b></p> <p>14 Q. If that is the case, that it was not operative on your</p> <p>15 mind on 1, 2 or 3 March, I am not going to ask you</p> <p>16 anything further about Operation Blythe.</p> <p>17 Other than that, by 1 to 3 March, did you have any</p> <p>18 previous knowledge of Mr Grainger?</p> <p>19 <b>A. No, sir.</b></p> <p>20 Q. The same question in relation to Robert Rimmer?</p> <p>21 <b>A. No, sir, no dealings.</b></p> <p>22 Q. The same question in relation to David Totton?</p> <p>23 <b>A. I had heard the name Totton, sir, but that was it.</b></p> <p>24 <b>I didn't know anything else about him, other than his</b></p> <p>25 <b>name.</b></p> <p style="text-align: center;">Page 18</p>	<p>1 Q. Can you recall now, if I mentioned a sighting of</p> <p>2 Mr Totton with a hacksaw the previous night,</p> <p>3 29 February, does that ring a bell?</p> <p>4 <b>A. I remember it being mentioned in a subsequent risk</b></p> <p>5 <b>assessment meeting --</b></p> <p>6 Q. Yes.</p> <p>7 <b>A. -- but I can't be any more specific than that, sir. My</b></p> <p>8 <b>recollection is very vague.</b></p> <p>9 Q. You cannot say one way or the other whether that was</p> <p>10 mentioned in this first contact with DI Cousen?</p> <p>11 <b>A. No, sir.</b></p> <p>12 Q. Can you recall whether, at this time, DI Cousen told you</p> <p>13 anything about a previous robbery committed perhaps in</p> <p>14 2008 in Preston where the suspects broke in, lay in wait</p> <p>15 for staff to arrive, held them up with a handgun and</p> <p>16 a shotgun?</p> <p>17 <b>A. Is this on the initial phone call, which --</b></p> <p>18 Q. Yes.</p> <p>19 <b>A. No, sir. That was not mentioned there.</b></p> <p>20 Q. That was not mentioned then. You say in your statement</p> <p>21 that you went with other officers --</p> <p>22 <b>A. Yes, sir.</b></p> <p>23 Q. -- to Culcheth and looked at financial institutions.</p> <p>24 <b>A. Yes, generally we walked around the area, sir,</b></p> <p>25 <b>familiarised ourselves and basically looked at</b></p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 <b>potential, I would say, targets. If you like, yes.</b></p> <p>2 Q. In your statement you say that you were looking at</p> <p>3 financial institutions rather than potential targets.</p> <p>4 <b>A. Well, it is the same thing, sir.</b></p> <p>5 Q. Is it? Were you looking at financial institutions or</p> <p>6 were you looking at any potential targets?</p> <p>7 <b>A. It's -- any potential target is the right answer.</b></p> <p>8 Q. Right. What did you do when you were there?</p> <p>9 <b>A. As I say, sir, it is a general walk around, familiarise</b></p> <p>10 <b>ourselves, look at where everything is, get a general</b></p> <p>11 <b>feel for the area.</b></p> <p>12 Q. Did you take any photographs?</p> <p>13 <b>A. No.</b></p> <p>14 Q. Did you pay attention to any particular premises?</p> <p>15 <b>A. No.</b></p> <p>16 Q. Can we look at something that you sent later in the day,</p> <p>17 and it is tab 14 in your bundle. I think this will be</p> <p>18 a new document for the chairman.</p> <p>19 Can you see an email that you sent at 5.11 that day?</p> <p>20 <b>A. Yes, sir.</b></p> <p>21 Q. It is from U2 and we don't know why that has been</p> <p>22 redacted but we have been told it is an error,</p> <p>23 underneath the "2" it says "Nicolas Bailey", who is</p> <p>24 a chief inspector, a TFC, in Cheshire Police.</p> <p>25 <b>A. Okay.</b></p> <p style="text-align: center;">Page 21</p>	<p>1 Q. In general terms, did you compile this document?</p> <p>2 <b>A. No, sir.</b></p> <p>3 Q. Who did compile it?</p> <p>4 <b>A. It would have been the staff back at the unit, I can't</b></p> <p>5 <b>be specific as to who did it, sir.</b></p> <p>6 Q. The staff back at the unit, you mean people in the TFU</p> <p>7 at Openshaw?</p> <p>8 <b>A. Members of the operations team would have compiled it,</b></p> <p>9 <b>sir.</b></p> <p>10 Q. But you can't help us with who?</p> <p>11 <b>A. No, sir.</b></p> <p>12 Q. Okay. If you look at some parts of it, to see where</p> <p>13 some parts of it came from, if we start, please, at 227,</p> <p>14 can you see the threat assessment?</p> <p>15 <b>A. Yes, sir.</b></p> <p>16 Q. Then if you just hold a finger in there and go forwards</p> <p>17 to page 256 in the same tab, can you see an email, the</p> <p>18 top of it is at the foot of the previous page, an email</p> <p>19 from Mr Lawler to Mr Heywood at 3.39 on the 1st, yes?</p> <p>20 Do you have that, at the foot of 255?</p> <p>21 <b>A. 255? Yes, sir.</b></p> <p>22 Q. Then, amongst others, it is distributed to H9 who we</p> <p>23 heard from yesterday.</p> <p>24 <b>A. Yes, sir.</b></p> <p>25 Q. Amongst the distribution lists that are set out there,</p> <p style="text-align: center;">Page 23</p>
<p>1 Q. Yes?</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. You say:</p> <p>4 "As per your recent conversation with Chief</p> <p>5 Inspector Lawler, here is a copy of the operational</p> <p>6 order."</p> <p>7 <b>A. Yes, sir.</b></p> <p>8 Q. Yes? You are sending to a TFC in Cheshire at about 5.10</p> <p>9 on the Thursday a copy of the operational order?</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. Presumably that is because Culcheth is on Cheshire's</p> <p>12 ground?</p> <p>13 <b>A. Yes, sir.</b></p> <p>14 Q. If we can just look at the state of the PowerPoint</p> <p>15 briefing at this time. We will come to see that this</p> <p>16 document is very similar to that which was delivered on</p> <p>17 the on 2 March at about 1.00 in the morning and then</p> <p>18 again at about 6.00 in the morning on 3 March.</p> <p>19 <b>A. Yes, sir.</b></p> <p>20 Q. If you just look at it, and see, for example, page 223.</p> <p>21 It is an incomplete version of the PowerPoint</p> <p>22 presentation that was subsequently delivered.</p> <p>23 <b>A. Yes, sir.</b></p> <p>24 Q. Effectively a draft or an early draft, yes?</p> <p>25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 22</p>	<p>1 are any of those people within the category of in the</p> <p>2 operations team back at Openshaw?</p> <p>3 <b>A. None of those are, sir, no.</b></p> <p>4 Q. Other than H9?</p> <p>5 <b>A. That's correct.</b></p> <p>6 Q. And if you look at the top of the page on 256 under</p> <p>7 "Threat assessment", yes?</p> <p>8 <b>A. Yes, sir.</b></p> <p>9 Q. I think you can see that the threat assessment that is</p> <p>10 set out there in Mr Lawler's email to Mr Heywood is word</p> <p>11 for word the same as the threat assessment in the</p> <p>12 PowerPoint briefing?</p> <p>13 <b>A. Yes, sir.</b></p> <p>14 Q. It looks like it has been copy typed or cut and pasted</p> <p>15 into it?</p> <p>16 <b>A. It looks that way.</b></p> <p>17 Q. Yes. Similarly, if you go to page 228 of the bundle,</p> <p>18 and compare that to the working strategy on page 256, it</p> <p>19 is word for word the same?</p> <p>20 <b>A. Yes, sir.</b></p> <p>21 Q. Including relevant capitalisation and punctuation?</p> <p>22 <b>A. Yes, sir.</b></p> <p>23 THE CHAIRMAN: Not the spelling of "Culcheth" though.</p> <p>24 MR BEER: Oh, you are quite right.</p> <p>25 Yes, an H missing.</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 If you look at the tipping points at page 229 and                  2 compare those to the tipping points on page 256, they                  3 are I think identical?                  4 <b>A. Again, sir, "Culcheth" is spelt wrong but other than                  5 that, yes, sir, that's correct.</b>                  6 Q. For example it includes the wrong registration number of                  7 the vehicle -- the right registration of the vehicle,                  8 but with the rather odd spacing. Yes?                  9 <b>A. Yes.</b>                  10 Q. Do you know how those three things, the working                  11 strategy, threat assessment and tipping point got into                  12 the PowerPoint presentation?                  13 <b>A. I wasn't party to that, sir, sorry.</b>                  14 Q. No, okay.                  15 If we carry on with the PowerPoint presentation, and                  16 look at 235, we can see what looks like a Google Maps or                  17 similar aerial photograph identifying Culcheth and a lay                  18 up point at Leigh police station?                  19 <b>A. Yes, sir.</b>                  20 Q. Again, do you know who compiled this?                  21 <b>A. No, sir.</b>                  22 Q. Then on to 239, please.                  23 We can see another aerial photograph with eight                  24 premises identified on it?                  25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 25</p>	<p>1 <b>A. Yes, sir.</b>                  2 Q. I think this is a recording of the briefing that you                  3 delivered with Chief Inspector Lawler on 2 March?                  4 <b>A. Yes.</b>                  5 Q. We can see the times, 1.07 to 1.33.                  6 <b>A. Yes.</b>                  7 Q. Yes? You announce in the third line:                  8 "I am the briefing officer, X7."                  9 <b>A. Yes, sir.</b>                  10 Q. What was the responsibility of the briefing officer,                  11 what does it mean?                  12 <b>A. Well, it is the responsibility -- I would conduct the                  13 introduction, it is the responsibility of the tactical                  14 firearms commander to deliver certain parts of the                  15 briefing in respect of the intelligence, the information                  16 and their threat and risk assessments, and it would be                  17 my sort of role if you like to go into the planning, as                  18 such, so the tactics that we may or may not employ.</b>                  19 Q. Thank you. If we look at the second page, 1176, do you                  20 see the large paragraph, the box with the four                  21 paragraphs in it?                  22 <b>A. Yes, sir.</b>                  23 Q. The paragraph that begins:                  24 "This group got hold of two knocked off cars, they                  25 then went over to Staffordshire ..."</p> <p style="text-align: center;">Page 27</p>
<p>1 Q. Are those the premises that you identified earlier in                  2 the day?                  3 <b>A. I really don't know, sir. What -- I didn't specifically                  4 say, "Note these premises" as far as I recall, but                  5 I didn't put that slide together, sir, so I really don't                  6 know.</b>                  7 Q. Similarly the previous page, 238, the one headed                  8 "Potential subject premises", you cannot help us now as                  9 to whether or not these are premises that you                  10 identified?                  11 <b>A. I really can't remember, sir.</b>                  12 Q. Okay.                  13 Similarly, the photographs at 241 to 244, you said                  14 that photographs were not taken on the day and that                  15 these might be I think Google Street View.                  16 <b>A. They definitely are Google Street View, sir, you can see                  17 the icon in the top left-hand corner.</b>                  18 Q. Yes. Do you know who compiled these?                  19 <b>A. No, sir.</b>                  20 Q. If we fast forward again, still further, to the briefing                  21 that you and Chief Inspector Lawler delivered at 1.00                  22 the next day, 2 March.                  23 <b>A. Yes, sir.</b>                  24 Q. If you can take out for me, please, the general firearms                  25 binder number 2. Look, please, at tab 21.</p> <p style="text-align: center;">Page 26</p>	<p>1 Is that you speaking or Chief Inspector Lawler?                  2 <b>A. It is not me, sir.</b>                  3 Q. It is not you?                  4 About four or five lines on he says:                  5 "Now, there is intelligence to suggest that these                  6 subjects were responsible for a robbery in 2008 in                  7 Kirkham in Preston, where they broke into a bank and lay                  8 in wait for staff to arrive. Again a point in that,                  9 they broke in around just after 3.00 in the morning,                  10 which is the reason why we are here at this time today."                  11 Yes?                  12 <b>A. Yes, sir.</b>                  13 Q. By this time, had you heard about the break-in in the                  14 bank in Kirkham in Preston in 2008?                  15 <b>A. I was aware of it, sir, yes.</b>                  16 Q. Ie before these words came out?                  17 <b>A. Yes. Yes, sir.</b>                  18 Q. By this time, were you aware of the sighting of the                  19 hacksaw?                  20 <b>A. I don't recall, sir.</b>                  21 Q. He says that this is "the reason why we are here at this                  22 time today", ie 1.00 in the morning. Did you understand                  23 therefore that, for this deployment, the plan was to                  24 counter a possible threat of subjects breaking into                  25 premises at night time --</p> <p style="text-align: center;">Page 28</p>

1 **A. Yes, sir.**  
 2 Q. -- laying in wait, waiting for staff to arrive?  
 3 **A. That's correct.**  
 4 Q. There wasn't any reference, as far as I can see in this  
 5 briefing, to a possible risk to cash in transit delivery  
 6 vans.  
 7 **A. No, sir.**  
 8 Q. Can you recall whether the following day, the 3rd, the  
 9 operation that resulted in Mr Grainger's death, whether  
 10 the risk was assessed to include a risk of a robbery of  
 11 a cash in transit delivery or pick up?  
 12 **A. As I recall, there was no specific intelligence to say**  
 13 **what the target of any offence may be.**  
 14 Q. We have heard evidence and seen documents that suggest  
 15 that there was a concern on the 3rd that that was  
 16 a risk, cash in transit deliveries. Indeed to such  
 17 an extent that the tipping points were changed, the  
 18 threat assessment was changed to make clear an explicit  
 19 reference to the possibility of a cash in transit  
 20 delivery. Is that something that rings a bell with you  
 21 now?  
 22 **A. It doesn't ring a bell, sir, but it sounds correct.**  
 23 Q. Okay.  
 24 The same PowerPoint, other than those changes about  
 25 cash in transits, was used the next day for the 3rd, the

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1 same PowerPoint delivery. Was the risk the following  
 2 day also assessed to include the risk that the subjects  
 3 would break into premises at night time, lay in wait for  
 4 staff to arrive and then hold them up at gunpoint?  
 5 **A. It was certainly a consideration that that could be**  
 6 **a possibility.**  
 7 Q. The following day you briefed at 6.00 in the morning --  
 8 **A. Yes, sir.**  
 9 Q. -- ie after the night time had largely passed?  
 10 **A. Yes, sir.**  
 11 Q. To your knowledge, was there any appreciable change in  
 12 the intelligence case as between the deployment for  
 13 2 March and 3 March?  
 14 **A. Not as I can recall, sir.**  
 15 Q. If we go back then to your volume in the tab that we  
 16 were in containing the PowerPoint, which was 14. Look,  
 17 please, at page 223, the only part that had been  
 18 completed was:  
 19 "The subjects of this operation are believed to be  
 20 engaged in armed robberies in the north-west region."  
 21 **A. Yes, sir.**  
 22 Q. We know that that sentence is a sentence that featured  
 23 in a very high number of previous editions of the  
 24 PowerPoint, going right back to December.  
 25 **A. Yes, sir.**

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1 Q. Was it common for PowerPoints to be re-used in this way,  
 2 ie you would cut and paste from them?  
 3 **A. Yes, sir, I would say so.**  
 4 Q. Then we can see that it says, "Further updates from TFC  
 5 and sponsor", the sponsor would be in this case  
 6 DI Cousen?  
 7 **A. Or a member of his staff.**  
 8 Q. Staff, yes.  
 9 At this time it looks like you were awaiting the  
 10 updates to be given?  
 11 **A. Possibly, sir. I mean it is not necessarily the case**  
 12 **that you would write everything down and be read**  
 13 **verbatim. Sometimes you would, other times you would**  
 14 **hand the intelligence information over to the TFC or the**  
 15 **sponsor and it would be -- it would just run like that.**  
 16 Q. I see. I think indeed there is a previous edition of  
 17 a PowerPoint where it remained just like this?  
 18 **A. Yes, sir, it is not unusual.**  
 19 Q. This doesn't necessarily mean that you were waiting for  
 20 information?  
 21 **A. Not necessarily.**  
 22 Q. It could be that it was written up this way and that the  
 23 TFC and the sponsor were just going to say it out loud?  
 24 **A. That's correct.**  
 25 Q. Over the page to 224, please, between pages 224 and 226

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1 we see three threat assessments. Again, did you play  
 2 any part in the obtaining of the information to compile  
 3 these?  
 4 **A. No, sir.**  
 5 Q. Do you know who did?  
 6 **A. No, sir.**  
 7 Q. Speaking in general terms, where, to your knowledge,  
 8 would officers obtain the information to complete threat  
 9 assessments of this kind?  
 10 **A. Generally, if you have a role profile from a recent**  
 11 **operation you would copy and paste those slides or you**  
 12 **would copy and paste the briefing as such and treat it**  
 13 **as a new briefing.**  
 14 Q. Right, so if there was something on the system in  
 15 relation to Operation Shire and these subjects, the  
 16 officer would just cut and paste it?  
 17 **A. It is likely, yes.**  
 18 Q. Can you just tell us how the system was organised, was  
 19 there a shared drive in the operations department?  
 20 **A. That's correct. There was a drive with all the**  
 21 **operations we have ever taken part in and they were**  
 22 **there, you could access them at any time.**  
 23 Q. There would be an icon with "Operation Shire", click on  
 24 it and by this time there might be ten briefings there?  
 25 **A. Yes, that's correct.**

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<p>1 Q. When you were passing this on, in this case to the chief 2 inspector in Cheshire Police --</p> <p>3 <b>A. Yes, sir.</b></p> <p>4 Q. -- this work had already been done without your input?</p> <p>5 <b>A. That's correct.</b></p> <p>6 Q. Okay, moving on then, you attended a risk assessment 7 meeting on 1 March?</p> <p>8 <b>A. Yes, sir.</b></p> <p>9 Q. Again, I don't think you have any notes of your 10 attendance at that meeting, is that right?</p> <p>11 <b>A. Can you be more specific, how do you mean?</b></p> <p>12 Q. I don't think you have any notes of --</p> <p>13 <b>A. I made rough notes.</b></p> <p>14 Q. Oh, did you?</p> <p>15 <b>A. Yes, sir.</b></p> <p>16 Q. Where were they?</p> <p>17 <b>A. They were submitted quite soon after the incident, sir.</b></p> <p>18 Q. Submitted to?</p> <p>19 <b>A. The IPCC.</b></p> <p>20 Q. Are you talking, if you just look in tab 10 --</p> <p>21 <b>A. No, sir, that is for the incident. No, I made notes at 22 the -- of that meeting at that meeting.</b></p> <p>23 Q. Who was at the meeting?</p> <p>24 <b>A. It was Mr Lawler, Mr Fitton, Mr Cousen, a surveillance 25 officer and a -- I think there was a detective there as</b></p> <p style="text-align: center;">Page 33</p>	<p>1 discharged?</p> <p>2 <b>A. I apologise, yes, brandished. Yes.</b></p> <p>3 Q. Yes.</p> <p>4 <b>A. And that was in Preston, in a bank in Preston in 2008, 5 where they lay in wait for the -- and they tied up the 6 staff at the bank.</b></p> <p>7 THE CHAIRMAN: Did he say what kind of weapons?</p> <p>8 <b>A. I believe it was a handgun and a shotgun, sir.</b></p> <p>9 MR BEER: Did he say that it was the three subjects that he 10 was briefing you about, Messrs Totton, Grainger and 11 Rimmer, that had been involved in that robbery?</p> <p>12 <b>A. No, sir.</b></p> <p>13 Q. Did he say which of the subjects had been involved?</p> <p>14 <b>A. Totton.</b></p> <p>15 Q. Following the meeting a firearms authority was granted; 16 is that right?</p> <p>17 <b>A. Yes, sir.</b></p> <p>18 Q. Did you play any part in the process by which the 19 firearms authority was granted?</p> <p>20 <b>A. No, sir. That is not my responsibility.</b></p> <p>21 Q. Did you go off duty at about 5.30 that day?</p> <p>22 <b>A. That's correct.</b></p> <p>23 Q. Did you come back on at about 11.00 that night?</p> <p>24 <b>A. That's correct, yes.</b></p> <p>25 Q. From, as we have seen, 1.07 in the morning, did you</p> <p style="text-align: center;">Page 35</p>
<p>1 <b>well.</b></p> <p>2 Q. Was the detective male or female?</p> <p>3 <b>A. I can't recall who it was, sir. I really don't know.</b></p> <p>4 Q. Was there anyone from the DSU?</p> <p>5 <b>A. Yes, sir.</b></p> <p>6 Q. Why were you there?</p> <p>7 <b>A. I was there as an OFC.</b></p> <p>8 Q. What was the purpose of being there as the OFC?</p> <p>9 <b>A. So I could listen to the intelligence information.</b></p> <p>10 Q. Can you now recall what you were told about the 11 intelligence and information?</p> <p>12 <b>A. We were told that the three subjects -- he believed 13 those three subjects were in the process of committing 14 or about to commit some form of robbery.</b></p> <p>15 Q. Were the three subjects named as Mr Totton, Mr Grainger 16 and Mr Rimmer?</p> <p>17 <b>A. Yes, sir.</b></p> <p>18 Q. At that meeting, what if anything did DI Cousen say 19 about a robbery in 2008 in Preston involving some or all 20 of the subjects?</p> <p>21 <b>A. Yes, sir, he referred to it where I think -- he went 22 into quite some detail about, I think he said there was 23 approximately £250,000 stolen. It was -- there was 24 weapons used --</b></p> <p>25 Q. When you say "weapons used". Do you mean brandished or</p> <p style="text-align: center;">Page 34</p>	<p>1 conduct, in conjunction with Chief Inspector Lawler, 2 a firearms briefing?</p> <p>3 <b>A. Yes, sir.</b></p> <p>4 Q. Can we go to tab 22 in the general bundle, please -- 5 sorry, it is tab 20. Can you look, please, at page 449.</p> <p>6 <b>A. Sorry, sir, where am I looking now?</b></p> <p>7 Q. This is tab 20.</p> <p>8 THE CHAIRMAN: This is the general bundle, not your bundle. 9 You want tab 20, so it should be near the beginning of 10 the second file in the general bundle, tab 20, page 449.</p> <p>11 <b>A. Yes, sir.</b></p> <p>12 MR BEER: We can see now by 1.00 in the morning, the same 13 slide has been added to in that there is now a second, 14 third and fourth paragraph.</p> <p>15 <b>A. Yes, sir.</b></p> <p>16 Q. Yes?</p> <p>17 Do you know who added this intelligence in?</p> <p>18 <b>A. No, sir.</b></p> <p>19 Q. Who do you think would be responsible for adding this 20 intelligence in?</p> <p>21 <b>A. Ultimately, sir, the tactical firearms commander is 22 responsible for the intelligence.</b></p> <p>23 Q. Why is that, why is the TFC ultimately responsible?</p> <p>24 <b>A. Because it is his briefing in effect. Yes, I deliver 25 some part of it, but he has ownership of it. It was his</b></p> <p style="text-align: center;">Page 36</p>

1 **responsibility.**  
 2 Q. How was, in practice, the TFC to discharge his  
 3 responsibility for ensuring the contents of the briefing  
 4 were as he wished them to be? Did they read the  
 5 briefing before it was delivered?  
 6 **A. They should do, sir.**  
 7 Q. Did they?  
 8 **A. I don't know whether he did or he didn't, sir.**  
 9 Q. Not on this occasion but generally. You have been  
 10 involved in a very high number of operations --  
 11 **A. Yes, sir.**  
 12 Q. -- did they generally say, "Hold on, stop, I want  
 13 a print of that, please, ten minutes quiet time, sit  
 14 down and read it to myself before it is delivered"?  
 15 **A. Yes, sir. It was generally reviewed by them, yes.**  
 16 Q. In the way I have described, "A printed copy, please"?  
 17 **A. It all depends, sir, on the circumstances at the time**  
 18 **but generally speaking they got a copy of the plan, and**  
 19 **they would review it and they would make any alterations**  
 20 **or request any alterations necessary, yes.**  
 21 Q. In this case, we can see what happened because we know  
 22 that this is Mr Lawler's printed copy, because he has  
 23 told us that he had a printed copy and that this is his  
 24 handwriting on it, with notes to himself, as prompts,  
 25 like a speaking note, to add content in the course of

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1 the oral delivery.  
 2 Firearms commanders should read the briefing before  
 3 it is delivered?  
 4 **A. Absolutely, yes.**  
 5 Q. And in practice they often did?  
 6 **A. Yes, sir, I think -- well I think 99.9 per cent of the**  
 7 **time, yes.**  
 8 Q. Okay. What about you as the OFC, some of this  
 9 PowerPoint is content that you are going to speak to?  
 10 **A. Yes, sir.**  
 11 Q. Did you do the same?  
 12 **A. I would read through it, yes.**  
 13 Q. So before it was delivered, you would have a hard copy.  
 14 Is that right?  
 15 **A. Not necessarily a hard copy. I could read it through**  
 16 **the shared drive.**  
 17 Q. Ultimately, whose responsibility is it to ensure that  
 18 the intelligence presented in the document is accurate  
 19 and reliable?  
 20 **A. It is the tactical firearms commander's.**  
 21 Q. Paragraph 2 of this document here:  
 22 "There is intelligence to suggest that these  
 23 subjects were responsible for a robbery in 2008 in  
 24 Preston ..."  
 25 That is different from what you have told us

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1 DI Cousen told you --  
 2 **A. Yes, sir.**  
 3 Q. -- in that he had told you that it was Mr Totton alone,  
 4 yes?  
 5 **A. Totton was with another individual, that was the**  
 6 **intelligence, but yes, neither of the two are mentioned**  
 7 **in that briefing from Mr Cousen.**  
 8 Q. When this was read out, did you notice that difference?  
 9 **A. I didn't, sir, no.**  
 10 Q. Can you see that there is a difference?  
 11 **A. Yes, there is a difference.**  
 12 Q. Is that because you interpret "these subjects" to mean  
 13 the three men that were then spoken about?  
 14 **A. Yes, sir. Yes.**  
 15 Q. If we can move forward, please, to the oral briefing,  
 16 which is the next tab, tab 21, please, and look at the  
 17 foot of page 1176. Can you see the last paragraph on  
 18 the page, beginning, "Err ..."  
 19 **A. Yes, sir.**  
 20 Q. If you just look at that, is that you speaking or still  
 21 Mr Lawler?  
 22 **A. It would be Mr Lawler.**  
 23 Q. He says:  
 24 "Before we go into the threat assessment, we all  
 25 need to be aware there is no current information or

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1 intelligence to say the subjects have either possession  
 2 or immediate access to firearms or other less lethal  
 3 weapons. However my assumption is that they are about  
 4 to commit armed robbery based on their previous criminal  
 5 behaviour. They will either firearms or less lethal  
 6 weapons, so you are all highly trained in judgment to  
 7 again deal with the threat that we may face at the time  
 8 that we go to intercept them."  
 9 Was that kind of statement about the assessment of  
 10 whether the subjects would have firearms or other less  
 11 lethal weapons a normal part of a briefing?  
 12 **A. If you have specific information, then you would expect**  
 13 **specific information to be delivered. So that was a --**  
 14 **I would say that was more of a general statement than**  
 15 **anything specific.**  
 16 Q. That is one thing, if you had specific intelligence you  
 17 would obviously expect it to be passed on?  
 18 **A. Yes, sir.**  
 19 Q. This is saying the opposite, "We don't have specific  
 20 intelligence", but then there is a "but"?  
 21 **A. Yes, sir.**  
 22 Q. Was that usual?  
 23 **A. It is difficult to say, sir. You deal with lots of TFCs**  
 24 **and they have their own different style. But quite**  
 25 **often with firearms operations you only have a certain**

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<p>1 <b>percentage of the information and intelligence, you</b>  2 <b>never have the complete picture or it is very rare you</b>  3 <b>have the complete picture. So generalisations like</b>  4 <b>this, are they the norm? Not necessarily, I think it is</b>  5 <b>fair to say that if you have anything specific, that is</b>  6 <b>given out.</b>  7 Q. Would this be unusual then?  8 <b>A. No, I would say.</b>  9 Q. It is not unusual?  10 <b>A. It is not unusual, no.</b>  11 Q. Okay.  12 From the firearms officers, the AFOs, and you  13 yourself --  14 <b>A. Yes, sir.</b>  15 Q. -- one of the critical things would be some form of  16 factual information or an assessment of that which was  17 available on the likelihood that the subjects were going  18 to be armed with a weapon of some sort?  19 <b>A. It is very important -- if we have intelligence or</b>  20 <b>information regarding specific weaponry, then definitely</b>  21 <b>that is really important to us.</b>  22 Q. On the briefing on the 3rd, the next day, given by  23 Mr Granby, there wasn't an equivalent assessment in that  24 way, ie we have got nothing current and specific, but  25 I assume that they will have firearms or other weapons</p> <p style="text-align: center;">Page 41</p>	<p>1 Q. Can you see the larger paragraph halfway through it?  2 <b>A. Yes, sir.</b>  3 Q. It says:  4 "The reason we are at Leigh police station is  5 obviously to intercept the subjects prior to them  6 getting to Culcheth."  7 <b>A. Yes, sir.</b>  8 Q. Then over the page at 1180, I think this is probably  9 still you then, in the second paragraph:  10 "While we are on the subjects, our intention is to  11 conduct an interception prior to any offence taking  12 place which is before we get to Culcheth."  13 <b>A. Yes, sir.</b>  14 Q. Was that the plan on the day?  15 <b>A. The plan is to intercept prior to any offence taking</b>  16 <b>place. It would be, if we had a -- in a position to</b>  17 <b>strike at the earliest opportunity we would look to do</b>  18 <b>so, but obviously that is dictated to by events. So the</b>  19 <b>important message you are trying to get across is we</b>  20 <b>don't want or we are not in a position to allow any</b>  21 <b>offence to occur. That is what we don't want to happen.</b>  22 Q. Of course, this goes a little bit beyond that though,  23 doesn't it, it doesn't just state the obvious, "We want  24 to intercept before they have committed a robbery", it  25 is:</p> <p style="text-align: center;">Page 43</p>
<p>1 because of their background. Was that just an example  2 of a difference in style?  3 <b>A. I would say so, yes. It is saying the same thing but in</b>  4 <b>a slightly different way.</b>  5 Q. Well, it didn't say anything, he didn't say anything  6 about it the next day.  7 <b>A. That is because there is nothing specific to say, sir.</b>  8 <b>It is a general sort of comment, I would say.</b>  9 Q. There wasn't anything specific for Mr Lawler to say, and  10 he has still said what we have seen at the foot of the  11 page there.  12 <b>A. Yes, sir, there is no intelligence to say they haven't</b>  13 <b>got -- there isn't any intelligence to say they had</b>  14 <b>weapons, that is what they are saying. And in fact</b>  15 <b>I think that is what they are both saying.</b>  16 Q. What, Mr Lawler by actually saying it and Mr Granby by  17 his silence?  18 <b>A. Hmm.</b>  19 Q. If you go over the page to 1179, please, can you see the  20 paragraph that begins, "And obviously you have the  21 method of entry kit ..."?  22 <b>A. Yes, sir.</b>  23 Q. Is that you speaking? If you need to just take a little  24 while to read it. (Pause)  25 <b>A. I think it probably is, sir, yes.</b></p> <p style="text-align: center;">Page 42</p>	<p>1 "We are at Leigh police station and our intention is  2 to intercept them before they get to Culcheth."  3 <b>A. Yes, sir.</b>  4 Q. Whose idea was that? Out of you, the TFC, the TAC  5 adviser or anyone else?  6 <b>A. I don't recall. I think potentially, it may have been</b>  7 <b>drawn from the tipping points, where I think the first</b>  8 <b>one was -- I can't remember off the top of my head.</b>  9 Q. Let's help you, if you look at the tipping points, go  10 back a tab to the PowerPoint and --  11 THE CHAIRMAN: 455?  12 MR BEER: Page 455.  13 <b>A. Yes, sir.</b>  14 Q. There was something you wanted to refer to I think in  15 the tipping points?  16 <b>A. Yes, sir, I mean that clearly states that one of the</b>  17 <b>tipping points is if they could be on their way to</b>  18 <b>Culcheth.</b>  19 Q. Yes. So it was drawn from the tipping point?  20 <b>A. Quite likely, sir.</b>  21 Q. Again, do you know whose idea it was, whose plan it was?  22 <b>A. The plan is the tactical firearms commander, sir.</b>  23 Q. Do you think this had been discussed and agreed with the  24 TFC before you said it?  25 <b>A. I would have -- I mean I can't remember that far back,</b></p> <p style="text-align: center;">Page 44</p>

1 **sir, but I would imagine it was drawn from the tipping**  
 2 **point, that first statement there.**  
 3 Q. Presumably you would like to think that you had  
 4 discussed and agreed it with the TFC before you said it?  
 5 Ie, "We plan to conduct a strike before the subjects get  
 6 to Culcheth".  
 7 **A. I can't remember any conversations, sir, that detailed.**  
 8 Q. Did you tell Cheshire Police that the plan was to stop  
 9 the subjects before they got on to Cheshire Police's  
 10 ground?  
 11 **A. I had no contact with Cheshire Police whatsoever.**  
 12 Q. Can you recall any discussion about needing to tell  
 13 Cheshire Police that the subjects would be stopped  
 14 before they got on to Cheshire Police's ground?  
 15 **A. That would be the responsibility of the tactical**  
 16 **firearms commander.**  
 17 Q. We have heard some evidence that that was Cheshire  
 18 Police's expectation, certainly the next day, on the  
 19 3rd, "We were told that the subjects would be stopped  
 20 before they got on to us".  
 21 **A. Yes, sir.**  
 22 Q. Were you party to any communication or did you hear any  
 23 such communication to Cheshire Police?  
 24 **A. No, sir.**  
 25 Q. If this represented part of the plan on 2 March,

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1 preventing the subjects from getting to Culcheth, was  
 2 that also the plan the next day?  
 3 **A. I think generally speaking, sir -- and I am only**  
 4 **speaking generally, it is such a long time ago -- the**  
 5 **intention was to intercept prior to any offence taking**  
 6 **place, and I really can't remember anything any more**  
 7 **specific than that. That was the theme throughout the**  
 8 **operation.**  
 9 Q. The equivalent briefing the next day, the 3rd, doesn't  
 10 include these statements by you or the TFC.  
 11 **A. Yes, sir.**  
 12 Q. Can you now recall whether there was a change of plan as  
 13 between the 2nd and the 3rd?  
 14 **A. I don't recall it -- I wouldn't class it as a change of**  
 15 **plan, sir, I think the plan is basically the same and it**  
 16 **is down to the personal style of the tactical firearms**  
 17 **commander, I would argue.**  
 18 Q. Can we move forward to 1183, please.  
 19 On that page, is that you speaking?  
 20 **A. Sorry, sir, where are we looking?**  
 21 THE CHAIRMAN: Back to tab 21, now, and the last page in  
 22 that tab we looked at was 1179. We are now moving  
 23 forward to 1183.  
 24 **A. Yes, sir.**  
 25 MR BEER: Is that you speaking?

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1 **A. Yes, sir.**  
 2 Q. Can you see about 10 lines in, you say:  
 3 "So when they have conducted recces in the past we  
 4 know that they have emerged, one of the subjects emerged  
 5 from this bush line here with a hacksaw. So whether  
 6 they have been effecting an entry through the fence  
 7 there or prepping to see if they can do or gain access  
 8 through there, we don't know."  
 9 **A. Yes, sir.**  
 10 Q. Who gave you that information, that one of the subjects  
 11 had emerged from a bush line with a hacksaw?  
 12 **A. I don't recall, sir.**  
 13 Q. Who are the possible candidates?  
 14 **A. It is either going to be surveillance officers or it**  
 15 **would be the SIO or potentially the detective he was**  
 16 **with. Those are the only three sources it could have**  
 17 **come from.**  
 18 Q. You don't have any recollection now of who it was that  
 19 told you?  
 20 **A. No, sir.**  
 21 Q. Lastly on this briefing, if we can go back, please, to  
 22 1181, the paragraph beginning, "Erm, contingencies ..."  
 23 **A. Yes, sir.**  
 24 Q. Is that you speaking?  
 25 **A. I -- probably, sir, yes. Yes.**

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1 Q. At the end of that paragraph, you say:  
 2 "It may be appropriate that they are getting on to  
 3 the plot. So if that is the case, and we can't get  
 4 close to them, we will let them deploy. As it stands  
 5 there is no threat to any individuals as far as we are  
 6 aware, so we may well be the safest option is to let  
 7 them deploy on foot and we conduct any strike there."  
 8 Yes?  
 9 **A. Yes.**  
 10 Q. I think the context of this is that if, contrary to the  
 11 plan, the subjects made it in a car into Culcheth, yes?  
 12 And they made it onto a plot. Yes?  
 13 **A. Yes, sir.**  
 14 Q. Because of the geography of Culcheth it may be  
 15 difficult, because it is quiet, to conduct a vehicle  
 16 stop in Culcheth. Yes?  
 17 **A. That's correct, sir.**  
 18 Q. Therefore it may be necessary to allow them to deploy on  
 19 to a plot, and then you say, "It may well be the safest  
 20 option is to let them deploy on foot", yes?  
 21 **A. All I am doing there, sir, is alerting officers to the**  
 22 **fact that not to get sucked into a vehicle strike, it**  
 23 **could be a foot strike.**  
 24 Q. Why might the safest option be to let them deploy on  
 25 foot rather than conduct a strike on their parked car?

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1 **A. Because obviously with operations such as this, which**  
 2 **are very fluid, you could get members -- they may park**  
 3 **in a very busy place, there may be people walking**  
 4 **around. We may not be able to isolate them from members**  
 5 **of the public.**  
 6 Q. Why would that make it still the safest option to let  
 7 them get out of the car and conduct a strike amongst  
 8 members of the public?  
 9 **A. I am not saying it is the safest option. What I am**  
 10 **suggesting is it may be a safer option than striking on**  
 11 **a car. It all depends on what is happening at the time.**  
 12 Q. In general terms, everything else being equal, would you  
 13 prefer to strike on a parked car or subjects who had got  
 14 out of a parked car?  
 15 **A. You can't be that specific. It all depends on where you**  
 16 **are, what the subjects are doing, the intelligence**  
 17 **surrounding that subject. You know, striking on**  
 18 **a vehicle may be preferred -- in most cases it probably**  
 19 **is, but it is all operation specific, so ...**  
 20 Q. Why, allowing for the caveats that you have mentioned,  
 21 that it is operation specific, which may depend on  
 22 a high number of variables --  
 23 **A. Absolutely, yes.**  
 24 Q. -- the location of the car, its orientation, the  
 25 presence of other members of the public close to it,

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1 your ability to make a covert approach to it, all of  
 2 those kind of things, why still did you say in general  
 3 terms your preference would be to strike on a vehicle?  
 4 **A. Well, if you go to a vehicle, you can contain that**  
 5 **vehicle, I am not going to say easily but you can**  
 6 **contain the subjects within that vehicle and you have**  
 7 **got a better chance of isolating them from the public.**  
 8 Q. Your preferred option, again assuming the other  
 9 variables don't dictate the outcome, would be to strike  
 10 on a vehicle?  
 11 **A. Yes, sir.**  
 12 Q. You said so you can contain the vehicle?  
 13 **A. Yes, sir.**  
 14 Q. Did you mean so you can prevent the vehicle from moving  
 15 or did you mean so you can contain the subjects within  
 16 the vehicle?  
 17 **A. It is, when you say that, sir, it is isolate the**  
 18 **subjects from the public, contain the vehicle itself and**  
 19 **the subjects as well. So it ticks all the boxes.**  
 20 Q. Thank you.  
 21 Had it been emphasised in training to you previously  
 22 or had an issue otherwise arisen about the difficulties  
 23 of observing the movements of subjects within vehicles?  
 24 **A. Not as I recall, sir, I don't think we would have gone**  
 25 **into anything that specific.**

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1 Q. And, in particular, in seeing their hand movements?  
 2 **A. Well, as an AFO, you are taught that from a very early**  
 3 **stage, you want to get control of the subjects and**  
 4 **specifically the hands.**  
 5 Q. But a strike on a vehicle means that a lot of the  
 6 subjects' body parts are likely to be necessarily  
 7 obscured from your view?  
 8 **A. That is a possibility, yes.**  
 9 Q. It means that a challenge is going to have to be put in  
 10 for them to show you their hands?  
 11 **A. A challenge goes in regardless, sir.**  
 12 Q. Whether you can see the hands or not?  
 13 **A. Yes, absolutely.**  
 14 Q. You said that you can't recall any particular discussion  
 15 or emphasis upon this, in the past?  
 16 **A. Every tactic has its -- obviously its pros and cons, its**  
 17 **advantages and disadvantages.**  
 18 Q. Had this been an identified disadvantage, as far as you  
 19 can recall?  
 20 **A. Nothing that was given out in training, so I don't**  
 21 **remember anything specific being said in that regard.**  
 22 Q. The reason for asking is that the Inquiry is aware of  
 23 a number of previous reports and investigations into  
 24 MASTS operations, which have culminated in a vehicle  
 25 strike in which somebody has been shot within the

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1 vehicle by an officer also within a vehicle --  
 2 **A. Yes, sir.**  
 3 Q. -- in part because of the alleged movement of the  
 4 subjects or a failure to comply with a command.  
 5 **A. Yes, sir.**  
 6 Q. Was the product of those investigations and reports  
 7 something that had been passed on to you in training?  
 8 **A. Not as I remember, sir, no.**  
 9 MR BEER: Sir, I don't know whether that is a convenient  
 10 moment?  
 11 THE CHAIRMAN: Thank you, Mr Beer. Yes, it probably is.  
 12 Would you like to stay there just for a moment. The  
 13 usher will come and escort you away, we are going to  
 14 take a five-minute break.  
 15 (11.22 am)  
 16 (A short adjournment)  
 17 (11.36 am)  
 18 MR BEER: I wonder whether the curtain could just be moved  
 19 slightly.  
 20 THE CHAIRMAN: Just adjust it a little.  
 21 Right, that is it.  
 22 MR BEER: Thank you.  
 23 THE CHAIRMAN: Thank you.  
 24 MR BEER: Before I move on, X7, to deal with the events of  
 25 3 March in more detail, we were discussing before the

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1 break the potential pros and cons of a strike on  
 2 subjects that have emerged from a vehicle --  
 3 **A. Yes, sir.**  
 4 Q. -- as opposed to those that remain within it.  
 5 **A. Yes, sir.**  
 6 Q. Would an additional advantage of allowing subjects to  
 7 emerge from a vehicle be that you have a greater  
 8 facility to be able to use less lethal weapons against  
 9 them if the need arises?  
 10 **A. Are you referring to the Taser?**  
 11 Q. Yes.  
 12 **A. There is no reason why you can't use a Taser on somebody**  
 13 **within a vehicle. Every officer has them, they are**  
 14 **available whether they are in vehicle or out on foot.**  
 15 Q. What about the barrier that the car presents?  
 16 **A. Yes, I mean obviously that is an issue, but if there**  
 17 **a barrier and for example the window, we carry window**  
 18 **breakers, so we could facilitate using the Taser on**  
 19 **people within vehicles.**  
 20 Q. In order for you to break the windows -- are you talking  
 21 about side windows there or a windscreen?  
 22 **A. Yes, side windows.**  
 23 Q. Yes. Very hard to break the windscreen?  
 24 **A. Absolutely.**  
 25 Q. In order to break the windows in order to use the Taser?

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1 **A. Yes, sir.**  
 2 Q. An officer or officers would themselves have to get  
 3 close to the vehicle in the first place?  
 4 **A. Yes, sir.**  
 5 Q. If it was judged that the subjects were armed or  
 6 otherwise so dangerous as to justify the deployment of  
 7 AFOs, that may put those officers at some risk?  
 8 **A. It is unlikely that you would draw your Taser on such**  
 9 **a strike, sir.**  
 10 Q. Looking at the matter generally, would that be a factor  
 11 to put in the pro column for allowing subjects to get  
 12 out of the vehicle?  
 13 **A. Potentially, yes, sir. Potentially, but obviously it is**  
 14 **offset with other issues.**  
 15 Q. Yes, of course, that you have mentioned.  
 16 **A. Yes.**  
 17 Q. Thank you.  
 18 At the end of the briefing, you I think told  
 19 officers that they were not to alight or move between  
 20 police vehicles and the subject vehicles --  
 21 **A. Yes, sir.**  
 22 Q. -- and they were to be readily identifiable as police  
 23 officers.  
 24 **A. Yes, sir.**  
 25 Q. What did you have in mind as requiring officers to be

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1 readily identifiable as police officers, what did they  
 2 need to do?  
 3 **A. Well, it is difficult if you are moving on to the strike**  
 4 **phase to -- you know, it all depends on what you have**  
 5 **got access to at the time but if you are going to**  
 6 **identify yourself as police officers, and you have no**  
 7 **identifiable markings, then you should be shouting and**  
 8 **identifying yourself as an armed police officer.**  
 9 Q. In terms of identifiable clothing or other objects that  
 10 an officer would wear, what did you have in mind that  
 11 they should be all putting on?  
 12 **A. Well, me personally, I had a jacket with police markings**  
 13 **on it, albeit it was a flap at the back.**  
 14 Q. Was there just the flap at the back or was there a flap  
 15 at the front as well?  
 16 **A. There was a flap at the front, but I was clearly in the**  
 17 **lead car and it was a covert operation so I wouldn't**  
 18 **have taken out the flap saying "police".**  
 19 Q. Did you, moving forward, take that flap out at any  
 20 stage?  
 21 **A. No, sir.**  
 22 Q. You told officers not to alight from moving vehicles.  
 23 **A. Yes, sir.**  
 24 Q. Is that a fundamental prohibition?  
 25 **A. It is a specific risk assessment about getting out of**

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1 **moving vehicles, sir, because if you disable yourself**  
 2 **then obviously it puts additional stress on the team.**  
 3 Q. You participated in the delivery of this briefing in the  
 4 morning on the 3rd --  
 5 **A. Yes, sir.**  
 6 Q. -- and then drove to Leigh police station; is that  
 7 right?  
 8 **A. That's correct.**  
 9 Q. Can you recall during the day at Leigh police station  
 10 a conversation with Q9 concerning what he believed the  
 11 subjects of the operation, or some of them, had done in  
 12 the past?  
 13 **A. I don't recall that conversation at all, sir.**  
 14 Q. Are you aware that Q9 says that he said out loud that  
 15 the subjects had been involved in a robbery in the past  
 16 in Bolton?  
 17 **A. I am aware of what he said, sir, yes.**  
 18 Q. And that you, I am summarising here, effectively  
 19 corrected him and said that it wasn't these subjects, it  
 20 was other subjects who had been convicted of the  
 21 offence?  
 22 **A. It -- quite possibly happened, sir, I just have no**  
 23 **recollection of that conversation.**  
 24 Q. What did you know then about the Bolton robbery?  
 25 **A. Yes.**

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<p>1 Q. No: what did you know?</p> <p>2 <b>A. Oh, what did I know. I apologise. It was a robbery</b></p> <p>3 <b>where it was a police van came across some subjects,</b></p> <p>4 <b>that were fleeing from an armed robbery and that</b></p> <p>5 <b>a shotgun was discharged at them from quite close.</b></p> <p>6 Q. Do you know which subjects were convicted of that?</p> <p>7 <b>A. I have no idea, sir, I can't recall.</b></p> <p>8 Q. Do you think you knew back in 2012?</p> <p>9 <b>A. I really can't recall, sir. I don't know.</b></p> <p>10 Q. You don't remember this conversation with him at all?</p> <p>11 <b>A. No, sir.</b></p> <p>12 Q. What did you do in the course of the day up until about</p> <p>13 6.00 to 7.00 when you moved off?</p> <p>14 <b>A. Obviously I was keeping in touch with the tactical</b></p> <p>15 <b>firearms commander, making sure everybody was okay and</b></p> <p>16 <b>occasionally or if I had any updates then I would pass</b></p> <p>17 <b>it on to the team, that sort of thing.</b></p> <p>18 Q. Did you have any conversations with the tactical</p> <p>19 commander about the welfare and condition of the</p> <p>20 officers?</p> <p>21 <b>A. Yes, sir. It is something that we did speak about.</b></p> <p>22 <b>I was asked about resilience, and so I made sure that</b></p> <p>23 <b>I went round to the team and asked them individually,</b></p> <p>24 <b>making sure that everybody was okay, and everybody was</b></p> <p>25 <b>fine.</b></p> <p style="text-align: center;">Page 57</p>	<p>1 Q. Did you pass that on to the other members of the team?</p> <p>2 <b>A. I can't be that specific, sir. I can't remember, but it</b></p> <p>3 <b>is likely I did, but I can't remember.</b></p> <p>4 Q. Would that be quite important information that Mr Granby</p> <p>5 was passing you?</p> <p>6 <b>A. Potentially, yes, sir.</b></p> <p>7 Q. You would like to think that you passed it on?</p> <p>8 <b>A. I would think so, sir, yes.</b></p> <p>9 Q. I wonder whether you can take out file R, it is file 2</p> <p>10 of R. In fact it is over here for you, X7.</p> <p>11 For the others following, you might need a pen to</p> <p>12 mark this up.</p> <p>13 THE CHAIRMAN: Is this the extra bundle that we received</p> <p>14 a few days ago?</p> <p>15 MR BEER: Yes.</p> <p>16 THE CHAIRMAN: There it is, I have it. Thank you.</p> <p>17 MR BEER: I am looking at 546, please.</p> <p>18 THE CHAIRMAN: Sorry.</p> <p>19 MR BEER: Will you forgive me a moment?</p> <p>20 Can you take out 546, please.</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. This is a record of phone billing for a handset</p> <p>23 attributed to Superintendent Granby for 2 and 3 March.</p> <p>24 You can see that in the third column, some telephones</p> <p>25 have been attributed to police officers, Mr Heywood,</p> <p style="text-align: center;">Page 59</p>
<p>1 Q. We have heard that at about 2.35 pm</p> <p>2 Superintendent Granby spoke to you and reviewed the</p> <p>3 resilience of the firearms officers, established that</p> <p>4 they had been at Leigh police station since about 6.30</p> <p>5 and that it was considered that all were fit and well</p> <p>6 rested. Does that sound about right?</p> <p>7 <b>A. Yes, sir.</b></p> <p>8 Q. He has said that both you and he, at that point, had no</p> <p>9 concerns about the TFU officers working into the early</p> <p>10 evening, does that sound about right?</p> <p>11 <b>A. Yes, sir.</b></p> <p>12 Q. What did you do yourself in terms of rest and</p> <p>13 relaxation?</p> <p>14 <b>A. A bit of TV, just sat down, chatted with the officers.</b></p> <p>15 <b>Nothing specific.</b></p> <p>16 Q. Did you sleep at all in the course of the day?</p> <p>17 <b>A. No, sir.</b></p> <p>18 Q. Did you receive any, before about 6.00, intelligence</p> <p>19 updates from Mr Granby?</p> <p>20 <b>A. Yes, sir.</b></p> <p>21 Q. What were they?</p> <p>22 <b>A. In respect of Rimmer, we believed he wouldn't be</b></p> <p>23 <b>involved.</b></p> <p>24 Q. Do you remember when you received that update?</p> <p>25 <b>A. I don't, sir, no.</b></p> <p style="text-align: center;">Page 58</p>	<p>1 Mr Hunt, Mr Sweeney, Mr Cousen, and sometimes it has</p> <p>2 been written as "Unknown", yes?</p> <p>3 <b>A. Yes, sir.</b></p> <p>4 Q. It seems, we have been told recently, that some of those</p> <p>5 unknowns are in fact you.</p> <p>6 <b>A. Quite possibly, sir, yes.</b></p> <p>7 Q. Were you using a GMP handset --</p> <p>8 <b>A. I don't think so.</b></p> <p>9 Q. -- or a personal handset?</p> <p>10 <b>A. It was my personal phone.</b></p> <p>11 Q. We have been told that, on this page, the call at</p> <p>12 08.00.10 is to you, yes? The 26-second call?</p> <p>13 <b>A. Yes, sir.</b></p> <p>14 Q. I don't suppose you can recall now what the content of</p> <p>15 that call was?</p> <p>16 <b>A. I have no idea, sir.</b></p> <p>17 Q. Over the page, please, at page 547, I am just going to</p> <p>18 go down and mark up the calls that we have been told are</p> <p>19 to you.</p> <p>20 Yes, if we can just check this first, it is</p> <p>21 a slightly odd way of doing things but it is happening</p> <p>22 as we speak.</p> <p>23 Can you look at that phone number and tell us</p> <p>24 whether that was your mobile? (Handed)</p> <p>25 <b>A. Yes, that's correct.</b></p> <p style="text-align: center;">Page 60</p>

<p>1 Q. Thank you.</p> <p>2 The calls to that number on this page, 547, are</p> <p>3 13.58.19 --</p> <p>4 <b>A. Yes, sir.</b></p> <p>5 Q. -- 14.32.09, 16.54.42, 17.27.13, 17.44.44, 17.58.54,</p> <p>6 18.13.59, 18.25.02, 19.04.47, 19.07.07 and then 19.19.49</p> <p>7 and 19.22.32 --</p> <p>8 <b>A. Yes, sir.</b></p> <p>9 Q. -- okay?</p> <p>10 On my copy I have marked "X7" on each of those,</p> <p>11 okay?</p> <p>12 The calls at 1.58, 2.42, 4.54, 5.27 and 5.44, can</p> <p>13 you now recall what they were about?</p> <p>14 <b>A. I don't know, sir, I never made any notes.</b></p> <p>15 Q. The majority of them are under a minute but one of them,</p> <p>16 the 5.27 call, was for 2 minutes and 10 seconds --</p> <p>17 <b>A. Yes, sir.</b></p> <p>18 Q. -- does that help you remember?</p> <p>19 <b>A. No, sir.</b></p> <p>20 Q. Did there come a time when you moved away from Leigh</p> <p>21 police station?</p> <p>22 <b>A. Yes, sir.</b></p> <p>23 Q. At that point, what radios in the car were available to</p> <p>24 you?</p> <p>25 <b>A. We had --</b></p> <p style="text-align: center;">Page 61</p>	<p>1 <b>a conversation over the telephone.</b></p> <p>2 Q. Presumably, if you used the back to back, then all of</p> <p>3 the other firearms officers would hear it too?</p> <p>4 <b>A. Yes, sir.</b></p> <p>5 Q. Whereas a mobile to mobile, it was just you and</p> <p>6 Mr Granby?</p> <p>7 <b>A. That's correct.</b></p> <p>8 Q. There came a time when you moved from Leigh police</p> <p>9 station; is that right?</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. If we can just look, please, at your first account, at</p> <p>12 tab 10 in your bundle. Can you see that?</p> <p>13 <b>A. Yes, sir.</b></p> <p>14 Q. Just before I ask you questions about some of the</p> <p>15 contents of your initial account, whose writing is that?</p> <p>16 <b>A. It was Mr Black's, who was a legal representative.</b></p> <p>17 Q. Was he a solicitor that attended the post-incident</p> <p>18 procedure?</p> <p>19 <b>A. Yes, sir.</b></p> <p>20 Q. How did you go about compiling this account, did you</p> <p>21 give an account and then he would write it out or was it</p> <p>22 done line by line?</p> <p>23 <b>A. Line by line.</b></p> <p>24 Q. Did you check its accuracy before you signed it?</p> <p>25 <b>A. Yes, sir. Yes.</b></p> <p style="text-align: center;">Page 63</p>
<p>1 Q. Ie what radio channels?</p> <p>2 <b>A. Yes, so we monitored the surveillance channel.</b></p> <p>3 Q. Was that on a main set in the vehicle broadcast through</p> <p>4 a speaker?</p> <p>5 <b>A. Yes, sir. And we had our own back-to-back radio</b></p> <p>6 <b>channels.</b></p> <p>7 Q. On the back to back, was that effectively a closed</p> <p>8 network of AFOs and you?</p> <p>9 <b>A. Yes, sir.</b></p> <p>10 Q. Was Mr Granby a party to that or not?</p> <p>11 <b>A. Very likely. He should have been, yes, sir.</b></p> <p>12 Q. Was there any other radio channel that connected you to</p> <p>13 the command suite?</p> <p>14 <b>A. No, sir.</b></p> <p>15 Q. What was your main means of communication back to the</p> <p>16 command suite, the back-to-back radio or a mobile</p> <p>17 telephone?</p> <p>18 <b>A. I would say it was the mobile phone which was, if you</b></p> <p>19 <b>wanted to pass anything specific over, yes.</b></p> <p>20 Q. Why was that, why was the main means of communication</p> <p>21 mobile to mobile?</p> <p>22 <b>A. Because I mean it is personal preference, sir, but if</b></p> <p>23 <b>you are listening to surveillance, you don't want to</b></p> <p>24 <b>miss anything which is important, so rather than having</b></p> <p>25 <b>two radios going with conversations, we could have</b></p> <p style="text-align: center;">Page 62</p>	<p>1 Q. I think you signed each page, but it is missed off the</p> <p>2 bottom. We can just see bits of your signature at the</p> <p>3 bottom.</p> <p>4 We have some evidence that the principal officers,</p> <p>5 including you, were making their initial accounts</p> <p>6 between about 2.30 and 4.45 in the morning.</p> <p>7 <b>A. Yes, sir.</b></p> <p>8 Q. Does that sound about right?</p> <p>9 <b>A. Yes, it does.</b></p> <p>10 Q. If we look, please, at page 497. Four lines from the</p> <p>11 bottom, you say:</p> <p>12 "The team left Leigh at approximately 18.30 and made</p> <p>13 our way to the Culcheth area, yes.</p> <p>14 <b>A. Yes, sir.</b></p> <p>15 Q. On the night of the incident, that was your best</p> <p>16 recollection of the time that you left?</p> <p>17 <b>A. Yes, sir.</b></p> <p>18 Q. Which, I would add in parenthesis, is likely to be</p> <p>19 accurate because we know that the surveillance team</p> <p>20 radioed at about 6.29 that the subjects were on the</p> <p>21 move.</p> <p>22 <b>A. Okay.</b></p> <p>23 Q. Yes?</p> <p>24 Was it the subjects being on the move in the Audi</p> <p>25 that caused you to move away from Leigh police</p> <p style="text-align: center;">Page 64</p>

<p>1 station --</p> <p>2 <b>A. Probably.</b></p> <p>3 Q. -- into the Culcheth area?</p> <p>4 <b>A. Yes, sir.</b></p> <p>5 Q. I just want to see what happened when you wrote up your</p> <p>6 fourth stage account. If we go to tab 1, please, and</p> <p>7 look at page 4 of the witness statement at page 88, can</p> <p>8 you see in the middle -- this is your account of</p> <p>9 9 March -- of the page there, it says:</p> <p>10 "At approximately 18.15 hours, with the permission</p> <p>11 of Superintendent Granby and under my direction, the</p> <p>12 MASTS team left Leigh police station."</p> <p>13 <b>A. Yes, sir.</b></p> <p>14 Q. Where did you get the time 6.15 from for this event?</p> <p>15 <b>A. I assume it was from the flip chart that was put up on</b></p> <p>16 <b>wall, sir.</b></p> <p>17 Q. I mean it certainly is the time on the flip chart --</p> <p>18 <b>A. Yes, sir.</b></p> <p>19 Q. -- was the flip chart up and working when you made this</p> <p>20 statement?</p> <p>21 <b>A. Yes, sir.</b></p> <p>22 Q. Just help us, given that you have made an initial</p> <p>23 account on the night, which turns out to be fairly</p> <p>24 accurate, and used the language "at approximately</p> <p>25 18.30", why did five days later you use a flip chart and</p> <p style="text-align: center;">Page 65</p>	<p>1 Q. -- making your way to the Culcheth area.</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. Can you recall now what you were told about who was in</p> <p>4 the vehicle?</p> <p>5 <b>A. I don't recollect whether it was at that time or not,</b></p> <p>6 <b>but we knew who two subjects were within the vehicle and</b></p> <p>7 <b>I am aware that there was a third unknown person within</b></p> <p>8 <b>that vehicle.</b></p> <p>9 Q. If you just look at your account in tab 10 at page 497,</p> <p>10 the initial account, you say in the penultimate line on</p> <p>11 the page at 497:</p> <p>12 "I was aware that there were three suspects in a red</p> <p>13 Audi A6 estate, which was a stolen vehicle."</p> <p>14 Yes?</p> <p>15 <b>A. Yes, sir.</b></p> <p>16 Q. You don't mention here anything about knowing the</p> <p>17 identity of two of them, knowing that Rimmer was not the</p> <p>18 third but there was an unknown male who was the third?</p> <p>19 <b>A. No, sir.</b></p> <p>20 Q. I don't think you mention that in your first account</p> <p>21 either, your first witness statement of 9 March?</p> <p>22 <b>A. No, sir.</b></p> <p>23 Q. Do you have a clear recollection about knowing that</p> <p>24 Rimmer wasn't amongst them?</p> <p>25 <b>A. I am aware that, sir -- yes, sir, I am.</b></p> <p style="text-align: center;">Page 67</p>
<p>1 change the time to 6.15?</p> <p>2 <b>A. Well, I didn't have access to my initial account when I</b></p> <p>3 <b>wrote my main statement.</b></p> <p>4 Q. Yes.</p> <p>5 <b>A. And I really couldn't remember the specifics, times,</b></p> <p>6 <b>that I had given. If have had the initial account,</b></p> <p>7 <b>I may well have written it differently, but I didn't</b></p> <p>8 <b>have access to it.</b></p> <p>9 Q. I think you took some other details from the flip chart,</p> <p>10 I suspect including the time of the briefing.</p> <p>11 <b>A. Yes, sir.</b></p> <p>12 Q. Starting at the time of the movement to Leigh police</p> <p>13 station, although I don't think you took the times of</p> <p>14 Amber or Red from it. I mean if you look, at your</p> <p>15 statement at pages 4, and 5 --</p> <p>16 <b>A. Yes, sir.</b></p> <p>17 Q. -- you don't include the Amber and Red times.</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Was there any reason for not doing that?</p> <p>20 <b>A. I can't remember specifically why I didn't take it off</b></p> <p>21 <b>there, sir, other than it is my own personal style of</b></p> <p>22 <b>writing statements and I just wrote it in that way.</b></p> <p>23 Q. Okay, going back to where we were then, which was at</p> <p>24 about 6.30, leaving Leigh police station --</p> <p>25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 66</p>	<p>1 Q. Was there any reason why you didn't write it down that</p> <p>2 you can now recall?</p> <p>3 <b>A. I can't recall, sir, why it wasn't recorded.</b></p> <p>4 Q. In any event, you mobilised and you say that you</p> <p>5 "identified a location for us to hold".</p> <p>6 <b>A. Yes, sir.</b></p> <p>7 Q. Was that a pub car park?</p> <p>8 <b>A. It was.</b></p> <p>9 Q. Was that the Raven Inn on Warrington Road?</p> <p>10 <b>A. Likely sir, yes.</b></p> <p>11 Q. Why did you hold at the pub car park?</p> <p>12 <b>A. Well, we were still on Green at that time.</b></p> <p>13 Q. Yes.</p> <p>14 <b>A. It was a suitable lay up point, there was room for us to</b></p> <p>15 <b>not stand out and we were close enough to get to</b></p> <p>16 <b>Culcheth as and when.</b></p> <p>17 Q. Did there come a time when you were told that the red</p> <p>18 Audi had come to a stop in a car park off Jackson Avenue</p> <p>19 in Culcheth?</p> <p>20 <b>A. Yes, sir.</b></p> <p>21 Q. We have been told that that was observed by DSU officers</p> <p>22 at about 6.45 pm, does that timing sound about right?</p> <p>23 <b>A. That sounds about right, sir, yes.</b></p> <p>24 Q. We have also been told that State Red was not declared</p> <p>25 until about 7.10 or 7.12 pm, so there was a period of</p> <p style="text-align: center;">Page 68</p>

<p>1 about half an hour between the car being first parked up 2 and the strike. 3 <b>A. Yes, sir.</b> 4 Q. What was done in that half an hour or so? 5 <b>A. Well, obviously you were waiting for updates from the 6 surveillance, it was some concern that we didn't have 7 any sight of them. I was busy doing my plans, I had 8 a tablet on my knee and I was working out where they 9 could possibly be, what they could possibly be doing and 10 trying to put contingencies in place and basically 11 trying to cover all bases.</b> 12 Q. You said that it was a concern that you didn't know 13 where they might be. 14 <b>A. Absolutely.</b> 15 Q. Was there a period of time when you knew that there had 16 been a loss of surveillance? 17 <b>A. Yes, sir.</b> 18 Q. Was that of acute concern to you? 19 <b>A. Absolutely, yes.</b> 20 Q. Was it of concern to the TFC, Mr Granby? 21 <b>A. I would imagine so, yes.</b> 22 Q. Did you hear him say anything? 23 <b>A. Well we could all have -- I didn't hear him say 24 anything, no, sir.</b> 25 Q. It was a concern for you because what, they may have got</p> <p style="text-align: center;">Page 69</p>	<p>1 <b>A. There are more complicated situations than that one, 2 I think it is fair to say.</b> 3 Q. There may be more complicated ones, but did this 4 position of this vehicle make it difficult to conduct 5 an effective strike? 6 <b>A. No, sir.</b> 7 Q. And why not? 8 <b>A. Because you could get the block on relatively easily.</b> 9 Q. Were there limitations on the directions from which you 10 could approach the vehicle? 11 <b>A. Absolutely, yes.</b> 12 Q. Just tell us about those, please? 13 <b>A. Because of the route in, we would show out -- if we 14 didn't go the direct route we would stand out.</b> 15 Q. You said if we didn't go the direct route, you mean if 16 you didn't go through the entrance to the car park, as 17 in fact you did, you would show out? 18 <b>A. Yes, sir. Absolutely.</b> 19 Q. By that you mean you would show out if you went through 20 the exit route? 21 <b>A. Yes, sir.</b> 22 Q. Yes? 23 <b>A. Yes.</b> 24 Q. Why would you show out by coming through the exit route? 25 <b>A. Well, for a start you would have to travel around the</b></p> <p style="text-align: center;">Page 71</p>
<p>1 out of the vehicle? 2 <b>A. They could be committing an offence under our very 3 noses, sir. That was my primary concern, yes.</b> 4 Q. We have heard that the position of the red Audi was 5 known at 6.45 -- 6 <b>A. Yes, sir.</b> 7 Q. -- in that it was in the last space on the right as you 8 drove into the car park -- 9 <b>A. Yes, sir.</b> 10 Q. -- up against a hedge or bordered by a hedge and a fence 11 at the back and that it was facing nose out. 12 Did you know that it was in that position? 13 <b>A. Yes, sir.</b> 14 Q. Did that cause you concern over the options that were 15 therefore available as to a strike on the vehicle? 16 <b>A. Could you be more specific, sir?</b> 17 Q. Yes. Did the position of the vehicle cause you any 18 concern over the limitation of the options as to how you 19 might strike it? 20 <b>A. The main concern was the proximity of it to the shopping 21 parade itself, in respect of where the vehicle was 22 parked, I could put an effective plan in and around that 23 vehicle.</b> 24 Q. Its position didn't make it particularly difficult to 25 effect a strike?</p> <p style="text-align: center;">Page 70</p>	<p>1 <b>complete circumference of the car park, with vehicles in 2 convoy. It would be quite obvious to anybody, certainly 3 who is surveillance conscious, that that is out of the 4 ordinary.</b> 5 Q. If you just take out bundle O1, please. There should be 6 at page 300A a plan like that, a map like that. 7 Do you have that, 300A? 8 THE CHAIRMAN: It will be -- yes, it is the second file that 9 Ms Curran has, yes. 10 It is not always easy to see the numbers on some of 11 these pages, you may have to find one where it is 12 visible and count. It should have been inserted in that 13 bundle as page 300A. 14 <b>A. I am there -- sorry, 301, sir?</b> 15 THE CHAIRMAN: 300A. 16 <b>A. Yes, sir, I have it.</b> 17 MR BEER: Thank you. 18 If you just reorientate yourself with the roads, do 19 you see Common Lane feeding into Warrington Road? 20 <b>A. Yes, sir.</b> 21 Q. Yellow feeding into red? 22 <b>A. Yes, sir.</b> 23 Q. Do you see the village green? 24 <b>A. Yes, sir.</b> 25 Q. You see the higher of the two pink dots, yes?</p> <p style="text-align: center;">Page 72</p>

<p>1 <b>A. Yes, sir.</b></p> <p>2 Q. Do you see to the left of that, there is a beige space,</p> <p>3 to the right-hand side of the "E" of Thompson Avenue,</p> <p>4 yes?</p> <p>5 <b>A. Yes, sir.</b></p> <p>6 Q. I think that is the car park there, isn't it?</p> <p>7 <b>A. Okay.</b></p> <p>8 Q. Yes?</p> <p>9 The entrance to the car park is on Jackson Avenue,</p> <p>10 yes?</p> <p>11 <b>A. Yes, sir.</b></p> <p>12 Q. And the exit is by the "E" of Thompson Avenue?</p> <p>13 <b>A. Yes, sir.</b></p> <p>14 Q. I think you said that you would have to drive round the</p> <p>15 circumference of it?</p> <p>16 <b>A. Yes, sir.</b></p> <p>17 Q. Couldn't you have driven down Jackson Avenue, turned</p> <p>18 right into Thompson Avenue --</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. -- and come in by the E, yes?</p> <p>21 <b>A. Yes, of course, yes.</b></p> <p>22 Q. You wouldn't necessarily have shown out by driving round</p> <p>23 the circumference of the car park, no?</p> <p>24 <b>A. Well, possibly not, sir.</b></p> <p>25 Q. No.</p> <p style="text-align: center;">Page 73</p>	<p>1 <b>A. Yes, sir.</b></p> <p>2 Q. -- the height restriction barrier, and the bonnet of the</p> <p>3 Audi --</p> <p>4 <b>A. Yes, sir.</b></p> <p>5 Q. -- as affording the subjects a good view and therefore</p> <p>6 a long view of an approaching car?</p> <p>7 <b>A. Possibly, sir, yes.</b></p> <p>8 Q. Did you think about the possibility at the time of one</p> <p>9 vehicle approaching through the entrance to the car</p> <p>10 park, as indeed you did, and another approaching through</p> <p>11 the exit to the car park, head on?</p> <p>12 <b>A. Yes, sir, I did.</b></p> <p>13 Q. Did you reject that as a possibility?</p> <p>14 <b>A. I weighed up both options and it was my view that coming</b></p> <p>15 <b>in the way we did was the most effective and quickest</b></p> <p>16 <b>route.</b></p> <p>17 Q. Why was it the most effective and the quickest route?</p> <p>18 <b>A. Because it would have -- the subjects wouldn't have seen</b></p> <p>19 <b>us till the last second and we could put a really good</b></p> <p>20 <b>effective block on there.</b></p> <p>21 Q. In the half hour or so between the subjects being parked</p> <p>22 up in that position and the strike --</p> <p>23 <b>A. Yes, sir.</b></p> <p>24 Q. -- did you discuss that with the TFC?</p> <p>25 <b>A. No, sir.</b></p> <p style="text-align: center;">Page 75</p>
<p>1 I think you were saying additionally that you would</p> <p>2 show out by driving in through an exit, yes?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. If you go on to photograph 308.</p> <p>5 <b>A. Yes, sir.</b></p> <p>6 Q. I think you can see there -- there are many depictions</p> <p>7 of this -- the length of the journey between the exit</p> <p>8 and the red Audi, yes?</p> <p>9 <b>A. Yes, sir.</b></p> <p>10 Q. Obviously the red Audi was pointing in the direction of</p> <p>11 the exit?</p> <p>12 <b>A. Yes, sir.</b></p> <p>13 Q. Are you saying that would have afforded a very clear and</p> <p>14 obvious view of the cars, the alpha and maybe the bravo</p> <p>15 car, coming in?</p> <p>16 <b>A. Okay, so when I did think recess, my -- obviously my</b></p> <p>17 <b>main sort of concentration, area of concentration, was</b></p> <p>18 <b>the shopping arcade and I did walk around the car park.</b></p> <p>19 <b>And if I was going to go in through the no entry, as you</b></p> <p>20 <b>say, the easiest and quickest route, because obviously</b></p> <p>21 <b>it was time critical, would have been around the</b></p> <p>22 <b>circumference of the car park.</b></p> <p>23 Q. That is a slightly different point. I was asking you</p> <p>24 about whether you regarded the distance between the</p> <p>25 exit, do you see the loop of metal --</p> <p style="text-align: center;">Page 74</p>	<p>1 Q. Did you discuss it with the TA, the TAC adviser?</p> <p>2 <b>A. No, sir.</b></p> <p>3 Q. Why not?</p> <p>4 <b>A. Because we didn't know where the subjects were.</b></p> <p>5 Q. I'm sorry?</p> <p>6 <b>A. We didn't know where the subjects were.</b></p> <p>7 Q. Weren't you working on the basis that, "If I am going to</p> <p>8 conduct a strike on the car the subjects will be in the</p> <p>9 car"?</p> <p>10 <b>A. At that time, sir, we didn't know where the subjects</b></p> <p>11 <b>were. That wasn't my only plan.</b></p> <p>12 Q. Sorry?</p> <p>13 <b>A. That wasn't my only plan. That wasn't the only thing on</b></p> <p>14 <b>my mind about the vehicle. There was quite a lot of</b></p> <p>15 <b>other things going through my mind.</b></p> <p>16 Q. What were the other things going through your mind?</p> <p>17 <b>A. Well, it was where could they be, what were they doing?</b></p> <p>18 <b>And thinking about if they were at a certain location,</b></p> <p>19 <b>how would we approach it there and all the rest of it.</b></p> <p>20 <b>If it was simply to strike on that vehicle at that last</b></p> <p>21 <b>known location, then it would be, I agree, quite simple</b></p> <p>22 <b>but it really wasn't as simple as that.</b></p> <p>23 Q. It was because you didn't know where the subjects were</p> <p>24 that caused you not to discuss the options of a strike</p> <p>25 on the vehicle with the TFC and the TA?</p> <p style="text-align: center;">Page 76</p>

<p>1 <b>A. Absolutely -- well I didn't know I was going to do</b> 2 <b>a vehicle strike at that stage.</b></p> <p>3 Q. When did you know that you were going to do a vehicle 4 strike?</p> <p>5 <b>A. Not until -- right up until the last moment.</b></p> <p>6 Q. What caused you to know that you were going to do 7 a vehicle strike at the last moment?</p> <p>8 <b>A. It comes to a point where you are at the point of no</b> 9 <b>return, so you are committed.</b></p> <p>10 Q. What caused you to know that you were going to do 11 a vehicle strike?</p> <p>12 <b>A. The proximity of us to the subject vehicle and the fact</b> 13 <b>that they were all still contained within that vehicle,</b> 14 <b>which had come from surveillance.</b></p> <p>15 Q. What did you hear about them being in the vehicle then?</p> <p>16 <b>A. I was aware that there was a front seat passenger,</b> 17 <b>driver and someone in the rear seat.</b></p> <p>18 Q. Who told you that?</p> <p>19 <b>A. It was a surveillance officer.</b></p> <p>20 Q. Where were you when you were placed on State Amber?</p> <p>21 <b>A. We were en route to the centre, to the shopping centre .</b></p> <p>22 Q. Where?</p> <p>23 <b>A. I can't remember specifically where, sir.</b></p> <p>24 Q. Can you look at your first statement, please, tab 1, at 25 page 4.</p> <p style="text-align: center;">Page 77</p>	<p>1 <b>A. I would imagine so, sir, yes.</b></p> <p>2 Q. There was a subsequent call at 19.07.07 for 12 seconds, 3 what was that call for?</p> <p>4 <b>A. I really can't recall, sir.</b></p> <p>5 Q. Why would he be calling you subsequently at 7.07?</p> <p>6 <b>A. I have no idea, sir.</b></p> <p>7 Q. Because Amber handed the operation over to you to decide 8 when to strike --</p> <p>9 <b>A. Yes, sir.</b></p> <p>10 Q. -- is that right?</p> <p>11 <b>A. Yes, sir.</b></p> <p>12 Q. But you cannot recall now what the subsequent call at 13 19.07 was about?</p> <p>14 <b>A. No, sir.</b></p> <p>15 Q. At the time that Amber was called, which was, on the 16 basis of those timings, at about 19.04 --</p> <p>17 <b>A. Yes, sir.</b></p> <p>18 Q. -- did you know that there were three subjects in the 19 vehicle?</p> <p>20 <b>A. Okay, I think the sequence of events was Mr Granby was</b> 21 <b>on the phone to myself, obviously he had concerns that</b> 22 <b>we had no view of them. He asked me to try and get</b> 23 <b>myself a little bit closer so we could be in a position</b> 24 <b>to react, so that is when we started moving from the pub</b> 25 <b>car park at a steady pace, nice and slow. And it was</b></p> <p style="text-align: center;">Page 79</p>
<p>1 <b>A. Yes, sir.</b></p> <p>2 Q. You say:</p> <p>3 "At approximately 1900 hours I received a telephone 4 call from Superintendent Granby ..."</p> <p>5 <b>A. Yes, sir.</b></p> <p>6 Q. "... as a result of the conversation, I mobilised alpha, 7 bravo and charlie on to Warrington Road." 8 Yes?</p> <p>9 <b>A. Yes, sir. Yes.</b></p> <p>10 Q. This is mobilising from the pub on to Warrington Road?</p> <p>11 <b>A. Yes, sir.</b></p> <p>12 Q. Yes:</p> <p>13 "As I turned on to Warrington Road I remained on the 14 phone with Superintendent Granby, who told me to place 15 the team on State Amber."</p> <p>16 <b>A. That sounds right, yes.</b></p> <p>17 Q. You were still on Warrington Road?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. The phone records that we looked at at bundle R, 20 page 547 show that there was a call from 21 Superintendent Granby at 19.04 --</p> <p>22 <b>A. Yes, sir.</b></p> <p>23 Q. -- for 33 seconds.</p> <p>24 <b>A. Yes, sir.</b></p> <p>25 Q. Is that likely to be that call?</p> <p style="text-align: center;">Page 78</p>	<p>1 <b>whilst I was on the phone during that conversation, that</b> 2 <b>is when he said -- that is when we got the information</b> 3 <b>through that there were three in that vehicle.</b></p> <p>4 Q. You said there that there were three in that vehicle --</p> <p>5 <b>A. Yes, sir.</b></p> <p>6 Q. -- is that the extent of the information that you were 7 given, that there were three people in the vehicle?</p> <p>8 <b>A. That is all I can recall, sir.</b></p> <p>9 Q. You didn't know which three or which subjects if any 10 were in the vehicle?</p> <p>11 <b>A. Not as I recall, sir.</b></p> <p>12 Q. If that is at about 19.04 --</p> <p>13 <b>A. Yes, sir.</b></p> <p>14 Q. -- did you then make straight to the car park from 15 Warrington Road?</p> <p>16 <b>A. Yes, sir.</b></p> <p>17 Q. At what point did you place the team on red?</p> <p>18 <b>A. I would have to go off my statement, sir.</b></p> <p>19 Q. It is page 5, page 89 in the first tab. 20 I think you tell us that it is as you approach the 21 mini roundabout of the junction between Warrington Road 22 and Common Lane?</p> <p>23 <b>A. Yes, sir.</b></p> <p>24 Q. Yes?</p> <p>25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 80</p>

1 Q. You then turn right into Common Lane on to  
 2 Jackson Avenue, yes?  
 3 **A. Yes, sir.**  
 4 Q. By this point had there been any communication between  
 5 you and the other cars as to tactics?  
 6 **A. Not at this time, sir, no.**  
 7 Q. If you look at tab 10 of your folder, please.  
 8 **A. Yes, sir.**  
 9 Q. In the middle of page 498, you say:  
 10 "After consultation with the TFC we placed the team  
 11 on ..."  
 12 Is that "he" or "we"?  
 13 **A. I assume it is going to be "he", sir. It is not my**  
 14 **writing.**  
 15 Q. "... he placed the team on State Amber, which  
 16 effectively handed control of the strike phase of the  
 17 operation to me."  
 18 **A. Yes, sir.**  
 19 Q. "The team made its way to the car park. On entering the  
 20 car park off Jackson Avenue I saw the red Audi parked to  
 21 the right-hand side in the far corner of the car park  
 22 facing outwards."  
 23 **A. Yes, sir.**  
 24 Q. "I passed on various instructions to the team and as my  
 25 vehicle pulled across the front of the Audi I called the

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1 strike."  
 2 Yes?  
 3 **A. Yes, sir.**  
 4 Q. There you have yourself passing on instructions to the  
 5 team, whilst you are on the car park?  
 6 **A. Well, that is incorrect, sir. It was done before then.**  
 7 Q. If it is incorrect, why is it in your first account as  
 8 happening on the car park?  
 9 **A. You wouldn't have left it to such a late stage to pass**  
 10 **that strike on, sir.**  
 11 Q. But this first account has got you leaving it to such  
 12 a late stage?  
 13 **A. It was left to a late stage, absolutely, yes.**  
 14 Q. Why does it have you passing on instructions only when  
 15 you are on the car park?  
 16 **A. Well, you wouldn't -- it would have been too late by**  
 17 **that stage, sir, it was before then.**  
 18 Q. But why has this been written in the way that it has,  
 19 having been checked and signed by you, if it is wrong?  
 20 **A. Okay, all I can say, sir, is the instructions were given**  
 21 **prior to us going on the car park.**  
 22 Q. But why has this account been written incorrectly then?  
 23 **A. It was perhaps an oversight, sir.**  
 24 Q. When were the instructions given to the other cars?  
 25 **A. After I -- shortly after I placed the team on Red.**

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1 Q. Where were the cars at that stage?  
 2 **A. Alpha, bravo and charlie were in convoy.**  
 3 Q. But where?  
 4 **A. Specifically, sir, I can't recall.**  
 5 Q. You say in your account in tab 1 at page 5, in between  
 6 the hole-punches:  
 7 "We turned right on to Common Lane and then left on  
 8 to Jackson Avenue. As the team was approaching  
 9 I informed them over the radio that the alpha vehicle  
 10 would effect a block and deal with the driver's side  
 11 whilst bravo would have the responsibility for the  
 12 passenger side. Charlie and delta cars were dedicated  
 13 to fill in where required."  
 14 Yes?  
 15 **A. Yes.**  
 16 Q. It appears that this is whilst you were on  
 17 Jackson Avenue approaching the car park?  
 18 **A. Yes.**  
 19 Q. Is that the right time when you --  
 20 **A. Quite possibly, sir. I mean it was a long time ago.**  
 21 Q. You say that you informed them over the radio, was that  
 22 bravo, charlie and delta cars?  
 23 **A. The back-to-back firearms channel, yes.**  
 24 Q. Are you sure that you broadcast that over the radio?  
 25 **A. Yes, sir.**

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1 Q. We have heard evidence from a number of AFOs in the  
 2 bravo and charlie cars that when they drove on to the  
 3 car park they had not heard any broadcast of tactics by  
 4 you.  
 5 **A. Yes, sir.**  
 6 Q. Was the radio, to your knowledge, in working order?  
 7 **A. It was, sir, yes.**  
 8 Q. Did you receive any acknowledgement from either the  
 9 bravo or charlie cars that they had heard your  
 10 broadcast?  
 11 **A. No, sir.**  
 12 Q. Have you any reason to believe that they didn't hear it?  
 13 **A. No, sir.**  
 14 Q. Is the reason that we have heard the evidence that we  
 15 have from the occupants of the bravo and the charlie  
 16 cars that such tactics were not broadcast over the radio  
 17 that you didn't broadcast the tactics?  
 18 **A. The tactics were broadcast. Whether they can recall**  
 19 **them or not, sir, I can't answer for them but**  
 20 **I definitely made that broadcast.**  
 21 Q. What was the content of the broadcast?  
 22 **A. It was:**  
 23 **"Alpha vehicle to take the driver's side, bravo**  
 24 **vehicle to take the passenger side, charlie and delta to**  
 25 **fill in."**

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1 Q. When you broadcast that, "Alpha to take the driver's  
 2 side", did you mean by that that you and the other two  
 3 occupants of the alpha car other than the driver, W4,  
 4 would be taking the driver's side?  
 5 **A. Yes, sir.**  
 6 Q. And the three occupants of the bravo car, other than the  
 7 driver, would be taking the passenger side of the Audi?  
 8 **A. Yes, sir.**  
 9 Q. Why was that the plan?  
 10 **A. Because it was simple.**  
 11 Q. That I think would have required Q9 to get out of the  
 12 rear offside seat of the car, the alpha car, run round  
 13 the rear of the alpha car down its nearside, around the  
 14 front of the alpha car, between the car and the hedge?  
 15 **A. Yes, sir.**  
 16 Q. That was part of the plan?  
 17 **A. Yes, sir.**  
 18 Q. Was the plan before you announced it the subject of any  
 19 discussion with anyone?  
 20 **A. No, sir.**  
 21 Q. You say in your statement that whilst you were  
 22 communicating this, you heard Q9 say that he would cover  
 23 the vehicle from his seat.  
 24 **A. Yes, sir.**  
 25 Q. Was that his initiative?

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1 **A. Yes, sir.**  
 2 Q. Was that a tactic that had been taught on GMP courses,  
 3 the provision of static cover from a vehicle?  
 4 **A. Static cover is taught from a very early stage, sir, for**  
 5 **ARV stops and the like but on MASTS, no, it is not**  
 6 **taught.**  
 7 Q. Is it something that you had been trained about on the  
 8 Met course that you had been on in January?  
 9 **A. No, sir, no.**  
 10 Q. Was it therefore a tactic that you were not familiar  
 11 with, staying in the vehicle providing cover?  
 12 **A. Not necessarily, sir. I mean we have done lots and lots**  
 13 **of work with vehicles, in training, so I would say it is**  
 14 **unusual.**  
 15 Q. Why is it unusual?  
 16 **A. It is not something we routinely do.**  
 17 Q. But why not? Do you know why not, that you don't  
 18 normally provide cover from within a car?  
 19 **A. It is just not something we would do as a matter of**  
 20 **course within the training curriculum, sir. It is not**  
 21 **something we have done.**  
 22 Q. You say that you considered this a sound tactical option  
 23 because it provided cover for the team as you approached  
 24 the vehicle?  
 25 **A. Yes, sir. It was a quick assessment.**

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1 Q. That was because your approach to the vehicle would be  
 2 a vulnerable time, because it was pointing nose out and  
 3 therefore you would be on clear view momentarily?  
 4 **A. Yes, sir.**  
 5 Q. Did you broadcast therefore that amendment to the plan,  
 6 namely Q9 staying in the vehicle and providing cover  
 7 from within it?  
 8 **A. No, sir.**  
 9 Q. Why was that?  
 10 **A. There simply wasn't time.**  
 11 Q. Where were you when Q9 said that he would provide cover  
 12 from the vehicle?  
 13 **A. An educated guess, sir, would be on Jackson Avenue.**  
 14 Q. You hadn't quite got on to the car park yet, is that  
 15 right?  
 16 **A. No, sir.**  
 17 Q. In your first account, your initial account --  
 18 **A. Yes, sir.**  
 19 Q. -- tab 10, 499, you don't describe Q9 saying that he was  
 20 going to do this?  
 21 **A. No, sir.**  
 22 Q. You agreeing to it?  
 23 **A. No, sir.**  
 24 Q. Or the reasons why you considered it the right thing to  
 25 do?

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1 **A. No, sir.**  
 2 Q. Why was that?  
 3 **A. The first account is exactly that, sir. It lacks**  
 4 **detail, it is to give investigators an idea of what has**  
 5 **gone on and to assist the investigation. It is accepted**  
 6 **that you would provide a more detailed account at**  
 7 **a later stage.**  
 8 Q. I think this account was quite, nonetheless, a detailed  
 9 one, it is nine pages long?  
 10 **A. Yes, sir.**  
 11 Q. But you are saying you didn't set out all of your  
 12 reasoning and everything that happened in it?  
 13 **A. No, sir.**  
 14 Q. You drove in the event onto the car park --  
 15 **A. Yes, sir.**  
 16 Q. -- yes?  
 17 **A. Yes.**  
 18 Q. As you drove onto the car park, you are in the front  
 19 passenger seat of the vehicle?  
 20 **A. I am, sir, yes.**  
 21 Q. Yes.  
 22 Did you notice whether the headlights of the Audi  
 23 were illuminated or not?  
 24 **A. I don't know, sir.**  
 25 Q. Okay. Did you see them illuminated at any point?

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<p>1 <b>A. No, sir.</b></p> <p>2 Q. When you drove on to the car park, could you see any of</p> <p>3 the occupants of the red Audi?</p> <p>4 <b>A. Not at that time, sir, no.</b></p> <p>5 Q. When was the first time that you could see that the car</p> <p>6 was occupied?</p> <p>7 <b>A. Probably 20 yards away from them, sir. We were</b></p> <p>8 <b>virtually on top of them.</b></p> <p>9 Q. You commenced at some stage a countdown over the radio?</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. What was the purpose of the countdown?</p> <p>12 <b>A. It is to alert the vehicles behind me that we are -- to</b></p> <p>13 <b>expect our vehicle to come to a stop very, very soon.</b></p> <p>14 Q. The last number in the countdown, is that when the</p> <p>15 vehicle is stopped?</p> <p>16 <b>A. It is not an exact science, sir, but yes.</b></p> <p>17 Q. That is the end point of the countdown?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. What speed, approximately, did W4 drive your alpha</p> <p>20 vehicle at?</p> <p>21 <b>A. It wasn't very fast.</b></p> <p>22 Q. Within the speed limit?</p> <p>23 <b>A. Absolutely, yes.</b></p> <p>24 Q. Less than 30 miles an hour?</p> <p>25 <b>A. Oh, yes, yes, yes.</b></p> <p style="text-align: center;">Page 89</p>	<p>1 <b>A. I assume it was W9, sir, because I had a lot to do,</b></p> <p>2 <b>I still had my communications and stuff, so ...</b></p> <p>3 Q. You said that you assume it was W9?</p> <p>4 <b>A. I would imagine, because he would have the door cracked</b></p> <p>5 <b>he would have been ready to move, where I still had</b></p> <p>6 <b>a little bit of work to do to get out of the vehicle.</b></p> <p>7 Q. What was the little bit of work that you still had to</p> <p>8 do?</p> <p>9 <b>A. Well, I had the radio in hand, had to grab my cap, get</b></p> <p>10 <b>my hand on the door handle and get out of the vehicle.</b></p> <p>11 Q. Did you put your cap on?</p> <p>12 <b>A. Yes, sir.</b></p> <p>13 Q. Did you put a respirator on?</p> <p>14 <b>A. No, sir.</b></p> <p>15 Q. Why was that?</p> <p>16 <b>A. Time.</b></p> <p>17 Q. You, having put your cap on, left the radio behind?</p> <p>18 <b>A. Yes, sir.</b></p> <p>19 Q. Got out of the car, where did you go when you exited the</p> <p>20 front nearside?</p> <p>21 <b>A. I ran round the front of my vehicle.</b></p> <p>22 Q. As you got out of your passenger door, did you look over</p> <p>23 to the vehicle?</p> <p>24 <b>A. No, sir.</b></p> <p>25 Q. At any time before you ran around the front of the alpha</p> <p style="text-align: center;">Page 91</p>
<p>1 Q. Was that so that you didn't show out?</p> <p>2 <b>A. There is a few reasons, sir. Yes, you don't show out,</b></p> <p>3 <b>that is the important thing, but it also gives you time</b></p> <p>4 <b>to think and react. If you go speeding into situations</b></p> <p>5 <b>then, you know, it causes people to rush and panic.</b></p> <p>6 Q. Did he pull the alpha vehicle across the front of the</p> <p>7 Audi?</p> <p>8 <b>A. Yes, sir.</b></p> <p>9 Q. Were you aware of coming into contact with the vehicle?</p> <p>10 <b>A. No, sir.</b></p> <p>11 Q. Did you call out words to the effect of, "Strike,</p> <p>12 strike, strike".</p> <p>13 <b>A. Yes, so that would be as the vehicle comes to a stop.</b></p> <p>14 Q. Did you then get out of your door --</p> <p>15 <b>A. Yes, sir.</b></p> <p>16 Q. -- get out of your seat through the door?</p> <p>17 <b>A. Yes, sir.</b></p> <p>18 Q. Did you, before getting out, look to your right to see</p> <p>19 the subjects?</p> <p>20 <b>A. No, sir.</b></p> <p>21 Q. Who was the first out of your vehicle, as far as you</p> <p>22 were aware?</p> <p>23 <b>A. I have no idea, sir. I would imagine it would be my</b></p> <p>24 <b>rear seat passenger, W9.</b></p> <p>25 Q. Sorry?</p> <p style="text-align: center;">Page 90</p>	<p>1 vehicle, did you look over?</p> <p>2 <b>A. No, sir, the first time I looked into the vehicle would</b></p> <p>3 <b>be as I went round the front of the alpha vehicle.</b></p> <p>4 Q. Between the hedge and the bonnet of the alpha vehicle?</p> <p>5 <b>A. Yes. Yes, sir.</b></p> <p>6 Q. At what point did you draw your weapon?</p> <p>7 <b>A. It would have been as I emerged from the front of our</b></p> <p>8 <b>vehicle.</b></p> <p>9 Q. So what, after you had been through the hedge?</p> <p>10 <b>A. I would imagine so, sir. I can't be that specific.</b></p> <p>11 Q. You went in the space between the bonnet of the alpha</p> <p>12 vehicle and the hedge?</p> <p>13 <b>A. Yes, sir.</b></p> <p>14 Q. You think probably after that you drew your weapon?</p> <p>15 <b>A. The weapon was a MP5, sir, so it was a long -- sorry, it</b></p> <p>16 <b>is a carbine so it was probably at the low port as I was</b></p> <p>17 <b>running. But as I come to obviously confront the</b></p> <p>18 <b>driver, I would have brought it up on aim.</b></p> <p>19 Q. In the low port. That is held by two hands, is that</p> <p>20 right?</p> <p>21 <b>A. Usually, sir, yes.</b></p> <p>22 Q. In front of you, pointing with the muzzle downwards at</p> <p>23 an approximate 45-degree angle?</p> <p>24 <b>A. Yes, sir.</b></p> <p>25 Q. One hand up near the trigger guard, is that right?</p> <p style="text-align: center;">Page 92</p>

<p>1 <b>A. There is one hand on the handle and the other one on the</b>  2 <b>stock -- on the front of the weapon, sir.</b>  3 Q. Right. Did you have any torch or other light  4 illuminated at this point?  5 <b>A. Yes, I had a TAC light on the front of the MP5.</b>  6 Q. Was that illuminated?  7 <b>A. I think it was, sir, yes. It usually is.</b>  8 Q. How do you illuminate it?  9 <b>A. There is a pressure pad on the front of the weapon.</b>  10 Q. Is the pressure pad where you are holding the front of  11 the weapon?  12 <b>A. Yes, sir.</b>  13 Q. You got round beyond the bonnet of your car when you  14 emerged from the hedge --  15 <b>A. Yes, sir.</b>  16 Q. -- and then did you look at the Audi?  17 <b>A. Yes, sir.</b>  18 Q. What did you see?  19 <b>A. I saw the driver of the vehicle, who was my main</b>  20 <b>concern, he was sat in the vehicle with his hands down.</b>  21 Q. Why was the driver of the vehicle your main concern?  22 <b>A. Because one of the main concerns was the vehicle could</b>  23 <b>be used as a weapon.</b>  24 Q. But before you -- did you reach the driver's door?  25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 93</p>	<p>1 Q. "I ran to the driver, the window was open."  2 <b>A. Yes.</b>  3 Q. In this account you can't say, because you say "I can't  4 be specific", when you heard the noise.  5 <b>A. Yes, sir.</b>  6 Q. You have told us today that it was when you were still  7 by your passenger door?  8 <b>A. In and around the passenger door, sir, yes.</b>  9 Q. How is it that you can tell us today that it was whilst  10 you were still at the passenger door that you heard the  11 bang, when on your account on the night you couldn't be  12 specific?  13 <b>A. Well, that is when the bang occurred, sir, at the time.</b>  14 <b>I didn't pay much attention. So I didn't want to sort</b>  15 <b>of invent things, I needed to be sure of when I heard</b>  16 <b>that, sir, so ...</b>  17 MR THOMAS: I am sorry, sir, I can't hear.  18 THE CHAIRMAN: "I didn't want to invent things, I needed to  19 be sure ..."  20 Can you please try to keep your voice up X7. Thank  21 you.  22 It is not always easy to hear what you are saying.  23 <b>A. Yes.</b>  24 MR BEER: My question was, if in your initial account, you  25 couldn't be specific where you were when you heard the</p> <p style="text-align: center;">Page 95</p>
<p>1 Q. Before you reached the driver's door, did anything  2 significant happen?  3 <b>A. Are you talking about when I heard the bang, sir, is</b>  4 <b>that --</b>  5 Q. Yes, if you want to talk about the bang then do so.  6 <b>A. Yes, sir.</b>  7 Q. When did you hear the bang?  8 <b>A. I was still at the -- I can't be specific as to where</b>  9 <b>I was but I was in and around the driver's door, of my</b>  10 <b>vehicle.</b>  11 Q. Of your vehicle?  12 <b>A. Of my vehicle, yes.</b>  13 Q. What was the nature of the noise that you heard?  14 <b>A. It was just a loud bang, sir.</b>  15 Q. If you look at your first account, please.  16 <b>A. Yes, sir.</b>  17 Q. Tab 10, page 499.  18 <b>A. Yes, sir.</b>  19 Q. You say, about 10 lines from the bottom:  20 "I got out and ran straight over to the driver.  21 Around this time (I cannot be specific) I heard a noise,  22 I am unsure if it was the sound of a firearm being  23 discharged or if it was the sound of vehicles  24 colliding."  25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 94</p>	<p>1 noise.  2 <b>A. Yes, sir.</b>  3 Q. Yes?  4 Today you have told us that you heard the noise when  5 you were in or around the passenger door of your car?  6 <b>A. That's correct, sir, yes.</b>  7 Q. Why didn't you say that in this initial account?  8 <b>A. Well, at the time, sir, I had got out of the vehicle and</b>  9 <b>I had run round and the bang was in and around that</b>  10 <b>time, sir. So obviously that is when the bang occurred.</b>  11 <b>When I was at the passenger door of my vehicle.</b>  12 Q. If you look at your witness statement, tab 1, at page 5.  13 At the foot of page 5 you say:  14 "I ran from my door and around the front of my  15 vehicle towards the driver of the Audi. My immediate  16 intention was to challenge the driver and ensure the  17 vehicle could not be used as a weapon. As I did this  18 I heard a noise. I assumed it was the sound of vehicles  19 colliding and continued my effort to get to the driver."  20 <b>A. Yes, sir.</b>  21 Q. "I cannot recall my exact position when I heard this  22 noise, as I didn't pay much attention to it. My  23 priority at this time was the driver of the Audi."  24 <b>A. Yes, sir.</b>  25 Q. In your second account you couldn't recall the position</p> <p style="text-align: center;">Page 96</p>

1 when you heard the noise.  
 2 **A. I still can't recall the exact position of where I was,**  
 3 **sir, I was -- I know where I was, there or thereabouts.**  
 4 Q. Today you have told us that you were in and around the  
 5 passenger door of your car.  
 6 **A. Yes, sir.**  
 7 Q. Ie you had yet to go past the bonnet of your car.  
 8 **A. Yes, sir.**  
 9 Q. And yet to reach the driver's door of the Audi.  
 10 **A. That's correct, yes.**  
 11 Q. How is it that you can remember today that detail when  
 12 in these first two accounts you were saying that you  
 13 couldn't remember where your position was?  
 14 **A. I think it is badly worded the statement, sir. But that**  
 15 **is where I was, I was at the driver's door -- the**  
 16 **passenger door, I apologise, of my vehicle.**  
 17 Q. Had the alpha vehicle come to a complete stop before you  
 18 got out of it?  
 19 **A. Yes, sir.**  
 20 Q. Are you sure about that?  
 21 **A. Absolutely, yes.**  
 22 Q. You said in this statement that you assumed that it was  
 23 the sound of vehicles colliding.  
 24 **A. Yes, sir.**  
 25 Q. Is that correct, that at the time of the events, namely

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1 on 3 March, you assumed that it was the sound of  
 2 vehicles colliding?  
 3 **A. Yes, sir.**  
 4 Q. Does that remain the case, that the noise that you  
 5 heard, you assume, was the sound of vehicles colliding?  
 6 **A. Well, at the time I remember the noise and it didn't**  
 7 **register, I mean it didn't register as a gunshot because**  
 8 **it just simply didn't sound loud enough. But,**  
 9 **regardless of that, I was going to the driver's door and**  
 10 **all my concentration was on that, sir, so I really**  
 11 **didn't pay much attention to it.**  
 12 Q. What about the noise made it sound to you like the noise  
 13 of two vehicles colliding.  
 14 **A. It was unlikely, sir. It was likely to be the --**  
 15 **a firearm being discharged.**  
 16 Q. Yes, I realise that, but what was it about the noise  
 17 that made you think that it was the sound of two  
 18 vehicles colliding?  
 19 **A. I have just said, sir, if you have ever heard a firearm**  
 20 **going off without ear defenders, it is just very, very**  
 21 **loud and it just didn't seem loud enough for it to -- it**  
 22 **just didn't register as a gun going off.**  
 23 Q. In any event, you carried on and made your way to the  
 24 driver's window?  
 25 **A. Yes, sir.**

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1 Q. And that was open?  
 2 **A. Yes, sir.**  
 3 Q. Could you see whether it had been wound open or whether  
 4 it was smashed?  
 5 **A. I was the first one there, sir. It was wound down.**  
 6 Q. You, at this time, were not in police uniform, is that  
 7 right?  
 8 **A. I had a strike jacket on, the only markings I had on my**  
 9 **strike jacket was on the patch under the back, the flap**  
 10 **on my back was out and I had my police baseball cap on.**  
 11 Q. Just look at tab 4, please a witness statement of  
 12 30 July 2014, where you say:  
 13 "I have been asked by the IPCC to detail what  
 14 identifiable police markings I had visible at the point  
 15 of arrest."  
 16 You say:  
 17 "I was wearing a police baseball cap at this time."  
 18 Are you sure you had the strike jacket as well?  
 19 **A. Yes, sir. Yes. It wouldn't have been visible to**  
 20 **anybody else, because obviously I didn't have any**  
 21 **markings on the front. The only markings I had would**  
 22 **have been the -- the flap on the back, so nobody else**  
 23 **would have seen it.**  
 24 Q. Is that why you didn't mention it?  
 25 **A. Yes, sir.**

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1 Q. Did you shout something to the driver?  
 2 **A. Yes, sir.**  
 3 Q. What did you shout?  
 4 **A. It would have been, "Armed police, show me your hands".**  
 5 Q. At this point, did you think you were the first person  
 6 to reach the vehicle?  
 7 **A. Yes, sir.**  
 8 Q. Had you heard anyone else shout, "Armed police, show me  
 9 your hands", at this point?  
 10 **A. Not as I recall, sir, no.**  
 11 Q. When you first came across the driver, in what position  
 12 were his hands?  
 13 **A. They were below the dashboard.**  
 14 Q. So you couldn't see them?  
 15 **A. No, sir.**  
 16 Q. When you shouted "Show me your hands", did the driver do  
 17 anything?  
 18 **A. Yes, sir, he raised his hands -- his hands up.**  
 19 THE CHAIRMAN: He raised his hand up?  
 20 **A. Yes, sir. Both hands.**  
 21 THE CHAIRMAN: Both hands?  
 22 **A. Yes, sir.**  
 23 MR BEER: Did you notice anything about his hands?  
 24 **A. Yes, sir. He was wearing gloves.**  
 25 Q. Was that on both hands?

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1 **A. As I recall, sir, yes.**  
 2 Q. Were you at this stage on aim at the driver --  
 3 **A. Yes, sir.**  
 4 Q. -- but with your TAC light on him?  
 5 **A. Yes, sir.**  
 6 Q. Had you any other sighting system engaged at this point?  
 7 **A. No, sir.**  
 8 Q. The ultra dot or the green strobe?  
 9 **A. I didn't have a green strobe on my weapon, it was the**  
 10 **ultra dot only.**  
 11 Q. Other than raising his hands did the driver of the  
 12 vehicle do anything else?  
 13 **A. He looked at me.**  
 14 Q. Did he look directly at you?  
 15 **A. Yes, sir.**  
 16 Q. Did that involve him turning his head?  
 17 **A. Only a little bit, sir, yes.**  
 18 Q. Presumably he had to look up a little as well?  
 19 **A. Yes, I would imagine so, sir, yes.**  
 20 Q. Can you demonstrate how he moved his hands when he moved  
 21 them from below the dashboard?  
 22 **A. It was a pivot of the elbow, sir. It was not a full up**  
 23 **round the head, it was a -- I would say around lower**  
 24 **chest height. (Indicates)**  
 25 Q. You have just demonstrated, for those who cannot see

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1 behind the curtain, this kind of action. (Indicates)  
 2 **A. Yes, sir.**  
 3 Q. Is your elbow being the fulcrum rather than lifting your  
 4 elbows up like that? (Indicates)  
 5 **A. Absolutely, yes.**  
 6 Q. Did you shout any further instructions at the driver?  
 7 **A. It would have been just repeating, "Armed police, show**  
 8 **me your hands", "Keep your hands there", that sort of**  
 9 **thing. So I can't remember specifically what I was**  
 10 **shouting.**  
 11 Q. In your statement you say:  
 12 "I shouted instructions at the driver to keep his  
 13 hands up."  
 14 **A. That would be right, yes.**  
 15 Q. Did the driver keep his hands up?  
 16 **A. No, sir. Well, yes, he did initially and then that**  
 17 **is -- and the CSDC went in then, sir.**  
 18 Q. How long after you shouting at the driver to raise his  
 19 hands, him raising his hands and looking directly at you  
 20 did the CSDC go in?  
 21 **A. It wasn't very long, sir, seconds.**  
 22 Q. When the CSDC went in, what was the first thing that you  
 23 were aware of? Of it going in?  
 24 **A. It discharges a fine white powder.**  
 25 Q. Were you aware of the window being broken first?

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1 **A. I don't recall the window going in, sir.**  
 2 Q. Describe what you saw when the CSDC went?  
 3 **A. I saw the driver, Mr Grainger, he flinched to his**  
 4 **right-hand side as the -- away from where the CSDC had**  
 5 **gone in, slightly and then --**  
 6 Q. Just stop there, can you describe using words and then  
 7 demonstrate using actions, what you mean by flinching to  
 8 his right-hand side away from where the CSDC went in?  
 9 **A. It was an involuntary sort of twitch, I would say, best**  
 10 **way of describing it to the right-hand side his head.**  
 11 Q. Which parts of his body did he twitch?  
 12 **A. It was just his head as far as I could see, sir.**  
 13 Q. Can you demonstrate, he still had his hands up at this  
 14 time?  
 15 **A. Yes, sir, his hands were there, chest high and then it**  
 16 **went off and he flinched to his right. (Indicates)**  
 17 Q. You have just shown us a movement like this, for those  
 18 behind the curtain. (Indicates)  
 19 Hands up like this, and then he moved liked that?  
 20 **A. Yes, sir, yes.**  
 21 Q. In fact it is the other way round -- it is a twitch from  
 22 the left to right?  
 23 THE CHAIRMAN: Yes, it is the other way round.  
 24 MR BEER: Did you do anything after he had flinched or  
 25 twitched to his right?

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1 **A. Yes, sir. Obviously I was still aiming my weapon at him**  
 2 **and then he just started lowering his hands very, very**  
 3 **slowly, started lowering his hands. I say very slowly,**  
 4 **he lowered his hands to his knees.**  
 5 Q. Was that both hands being lowered?  
 6 **A. Yes, sir.**  
 7 Q. Were they lowered at approximately the same pace?  
 8 **A. Yes, sir.**  
 9 Q. Could you see where they went?  
 10 **A. They disappeared behind the dash, behind the door, sir,**  
 11 **they went out of my view.**  
 12 Q. If we can take out the photograph bundle, please.  
 13 Unfortunately there are not very good photographs of the  
 14 car in situ down this side, but if you look, please, at  
 15 486.  
 16 **A. Yes, sir.**  
 17 Q. This is the car after it has been recovered back at the  
 18 garage?  
 19 **A. Yes, sir.**  
 20 Q. Can you describe where, by reference to that photograph,  
 21 you were standing?  
 22 **A. I was standing by the A pillar, just behind where the**  
 23 **wing mirror is. So pointing in at a 45-degree angle,**  
 24 **something along those lines, I was not straight on to**  
 25 **the door at a 90-degree angle, I was offset.**

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<p>1 Q. If we drew a line coming at 90 degrees out of the Audi, 2 yes, out of the side of the Audi, how far along it would 3 you be? Where was your left foot, where was your right 4 foot? 5 <b>A. I can't be that specific, sir, I am afraid but it was --</b> 6 <b>all I can tell you is I was aiming in and aiming down</b> 7 <b>and I was stood in between the wing mirror and the front</b> 8 <b>wheel of the vehicle.</b> 9 Q. Was your best view through the side window or the 10 windscreen? 11 <b>A. Both, sir. The A pillar was in the way, but I could see</b> 12 <b>both hands -- my recollection, sir, I think the left</b> 13 <b>hand would have been through the windscreen and the</b> 14 <b>right hand would have been through the window.</b> 15 Q. Thank you. You can put those away now. 16 You have said that the driver slowly lowered his 17 hands down out of your sight, behind the dashboard? 18 <b>A. Yes, sir.</b> 19 Q. You couldn't see where they were going to -- 20 <b>A. No, sir.</b> 21 Q. -- or what they were doing, the only description you 22 could give is that he lowered his hands down out of your 23 sight? 24 <b>A. Yes.</b> 25 Q. Did you shout at him to keep his hands up?</p> <p style="text-align: center;">Page 105</p>	<p>1 with the muzzle of your MP5 do you say that you looked 2 down beforehand? 3 <b>A. No, sir, it was a simultaneous movement as I struck him</b> 4 <b>on the right hand arm I glanced down at his lap to see</b> 5 <b>what he was going for.</b> 6 Q. The way that you describe it in this paragraph is that 7 he dropped his hands out of your view, you thought he 8 might be going for a weapon or trying to drive the 9 car -- 10 <b>A. Yes, sir.</b> 11 Q. -- you struck him with your weapon. Yes? 12 <b>A. Yes, sir.</b> 13 Q. That had no effect -- 14 <b>A. Yes, sir.</b> 15 Q. -- and then you glanced down. 16 <b>A. It was a simultaneous movement, sir.</b> 17 Q. What, as you struck him with the muzzle of your weapon 18 you glanced down. 19 <b>A. Yes, sir.</b> 20 Q. Did you therefore see when you struck him with your 21 weapon that he had nothing his lap? 22 <b>A. Yes, sir.</b> 23 Q. Did you then look at his face and see that his eyes 24 rolled back and he slumped to the right-hand side. 25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 107</p>
<p>1 <b>A. I did, sir, yes.</b> 2 Q. Did he comply, did you think that he may be reaching for 3 a weapon? 4 <b>A. I didn't know what he was doing, sir, but that was</b> 5 <b>certainly a possibility that was on my mind, yes.</b> 6 Q. Or that he was going to attempt to drive the car? 7 <b>A. Yes, sir.</b> 8 Q. In your statement if you look at it, please, tab 1, 9 page 6 or page 90, it is the fourth paragraph from the 10 bottom. 11 <b>A. Yes, sir.</b> 12 Q. You say: 13 "I feared that he was either reaching for a weapon 14 or was going to attempt to drive the car." 15 <b>A. Yes, sir.</b> 16 Q. If you thought he may be reaching for a weapon, why did 17 you not shoot him? 18 <b>A. Fortunately, sir, I was in a position where I was close</b> 19 <b>enough to glance down and look, and I could see there</b> 20 <b>was nothing there.</b> 21 Q. Do you say that in this statement? 22 <b>A. Yes, sir.</b> 23 Q. Where? 24 <b>A. That's fourth paragraph down, sir.</b> 25 Q. Yes, but before you struck him on the upper right arm</p> <p style="text-align: center;">Page 106</p>	<p>1 Q. I think you say in your statement you assumed that he 2 had fainted. Was that because you had seen that 3 reaction by other subjects on other operations? 4 <b>A. Yes, sir.</b> 5 Q. Was that quite a well-known phenomenon amongst AFOS? 6 <b>A. No, not really, sir. Different people react in</b> 7 <b>different ways, but I have certainly seen that with</b> 8 <b>other people, yes.</b> 9 Q. Is it something that would be mentioned in training, 10 that sometimes because of the circumstances subjects 11 faint? 12 <b>A. I think it is more experience than training, sir.</b> 13 Q. Did other officers then reach into the vehicle and drag 14 the driver out? 15 <b>A. Yes, sir.</b> 16 Q. Before that had happened, had you tried to pull him out? 17 <b>A. No, sir, I always kept both hands on my weapon.</b> 18 Q. Had anyone else on your side tried to pull him out? 19 <b>A. Yes, sir.</b> 20 Q. I don't think you described that in your statement, did 21 you? 22 <b>A. No, sir.</b> 23 Q. Who else from your side had tried to drag him out? 24 <b>A. I couldn't say, sir, I was -- my whole concentration was</b> 25 <b>on the driver.</b></p> <p style="text-align: center;">Page 108</p>

<p>1 Q. You have described the CSDC going into the vehicle --</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. -- did you see the canister come in?</p> <p>4 <b>A. I didn't see the canister go in, no, sir.</b></p> <p>5 Q. When you were standing in the position that you have</p> <p>6 described looking at the driver, could you see whether</p> <p>7 there was a passenger in the vehicle, in the front seat?</p> <p>8 <b>A. I will be honest with you, sir. I was just looking at</b></p> <p>9 <b>the driver, I didn't notice.</b></p> <p>10 Q. Similarly had you seen whether there was a rear seat</p> <p>11 passenger at the time?</p> <p>12 <b>A. I didn't look.</b></p> <p>13 Q. As the officers pulled Mr Grainger up out of the</p> <p>14 vehicle, did you see his clothing ride up?</p> <p>15 <b>A. Yes, sir.</b></p> <p>16 Q. Did you see his chest and stomach area?</p> <p>17 <b>A. Yes, sir.</b></p> <p>18 Q. Did you notice that he had blood on his chest and</p> <p>19 stomach area?</p> <p>20 <b>A. Yes, sir.</b></p> <p>21 Q. Did you realise that he had suffered an injury?</p> <p>22 <b>A. Yes, sir.</b></p> <p>23 Q. At that point did you know how it had been caused?</p> <p>24 <b>A. No, sir.</b></p> <p>25 Q. Were you shocked?</p> <p style="text-align: center;">Page 109</p>	<p>1 Q. Did you ask the TAC adviser to ask for an ambulance?</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. Did an ambulance arrive subsequently?</p> <p>4 <b>A. Yes, sir.</b></p> <p>5 Q. Were you informed that Mr Grainger had died?</p> <p>6 <b>A. Yes, sir.</b></p> <p>7 Q. How soon after that did you leave the scene?</p> <p>8 <b>A. It's -- I am going to estimate it to be about 45 minutes</b></p> <p>9 <b>to an hour, but I could be wrong, sir.</b></p> <p>10 Q. Did you take part in a post-incident procedure?</p> <p>11 <b>A. Yes, sir.</b></p> <p>12 Q. Before you made your initial account, did you speak with</p> <p>13 any other officers about what had happened?</p> <p>14 <b>A. No, sir.</b></p> <p>15 Q. Why not?</p> <p>16 <b>A. Because we know not to, sir.</b></p> <p>17 Q. Did you receive any specific warnings to that effect?</p> <p>18 <b>A. I don't recall if we did, sir, but everybody knows we</b></p> <p>19 <b>don't confer.</b></p> <p>20 Q. Did you go to Claytonbrook?</p> <p>21 <b>A. Yes, sir.</b></p> <p>22 Q. Were you co-located with the other AFOs?</p> <p>23 <b>A. Yes, sir.</b></p> <p>24 Q. Did anyone, did you, ask Q9 whether it was he that had</p> <p>25 fired his weapon?</p> <p style="text-align: center;">Page 111</p>
<p>1 <b>A. Yes, sir.</b></p> <p>2 Q. You had been the first officer in contact with the</p> <p>3 driver, yes?</p> <p>4 <b>A. That's correct, yes.</b></p> <p>5 Q. And you hadn't seen any contact that could have caused</p> <p>6 such a chest injury?</p> <p>7 <b>A. No, sir.</b></p> <p>8 Q. Could you hear somebody shout "He has been shot"?</p> <p>9 <b>A. Yes, sir. It was as he was being pulled out of the</b></p> <p>10 <b>vehicle.</b></p> <p>11 Q. Did you see officers provide trauma care?</p> <p>12 <b>A. Yes, sir.</b></p> <p>13 Q. Did you go back around the front of the alpha vehicle</p> <p>14 and look at the officers providing trauma care?</p> <p>15 <b>A. Yes, sir.</b></p> <p>16 Q. At that point did you see the bullet hole in the front</p> <p>17 windscreen --</p> <p>18 <b>A. Yes, sir.</b></p> <p>19 Q. -- of the Audi. Yes?</p> <p>20 <b>A. Yes, sir.</b></p> <p>21 Q. Did you provide any trauma care?</p> <p>22 <b>A. No, sir.</b></p> <p>23 Q. Did you get in contact with the TAC adviser to say</p> <p>24 a weapon had been discharged and there was a casualty?</p> <p>25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 110</p>	<p>1 <b>A. I didn't speak to Q9 at all, sir.</b></p> <p>2 Q. Did you learn that it was Q9 that had fired his weapon?</p> <p>3 <b>A. I knew it was Q9 at the scene.</b></p> <p>4 Q. How did you know it was Q9?</p> <p>5 <b>A. I was told.</b></p> <p>6 Q. By who?</p> <p>7 <b>A. I don't recall, sir.</b></p> <p>8 Q. Did you speak with Q9 at the scene?</p> <p>9 <b>A. No, sir.</b></p> <p>10 Q. Did you not wish to know why he had fired his weapon?</p> <p>11 <b>A. No, sir.</b></p> <p>12 Q. Why not?</p> <p>13 <b>A. Because that is his evidence, not mine.</b></p> <p>14 Q. Would you not wish to know whether he had seen a weapon</p> <p>15 or not in order to know whether to search for it or not?</p> <p>16 <b>A. We wouldn't ordinarily search a vehicle, sir.</b></p> <p>17 Q. Wouldn't your first priority be to locate and secure any</p> <p>18 firearms other than police issue firearms?</p> <p>19 <b>A. It would be to secure the scene, sir, yes.</b></p> <p>20 Q. You mean put a cordon up?</p> <p>21 <b>A. Yes, sir, to prevent the scene being contaminated.</b></p> <p>22 Q. Two other topics, if I may.</p> <p>23 <b>A. Yes, sir.</b></p> <p>24 Q. Your plan was -- as you have said, announced over the</p> <p>25 radio -- to deal, along with Q9 and W9, with the</p> <p style="text-align: center;">Page 112</p>

<p>1 driver's side of the Audi?</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. Did W9 follow you down the driver's side?</p> <p>4 <b>A. I don't believe, sir, no.</b></p> <p>5 Q. Did you see where he went?</p> <p>6 <b>A. No, sir.</b></p> <p>7 Q. Second point, did you attend a meeting of the PFOA on</p> <p>8 8 March --</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. -- Thursday?</p> <p>11 <b>A. Yes, I was present in the office, yes.</b></p> <p>12 Q. What was the purpose of the meeting?</p> <p>13 <b>A. It was purely welfare.</b></p> <p>14 Q. What was discussed at the meeting?</p> <p>15 <b>A. I don't recall it in specific detail, sir. It was to</b></p> <p>16 <b>offer the services of the PFOA and the like.</b></p> <p>17 Q. Did you speak with or meet V53, the man that had shot</p> <p>18 Mark Duggan?</p> <p>19 <b>A. No, sir.</b></p> <p>20 Q. Was he present in the room.</p> <p>21 <b>A. He was, sir.</b></p> <p>22 Q. What did he say, if anything?</p> <p>23 <b>A. I am sorry, sir, I can't recall specifically what he</b></p> <p>24 <b>said.</b></p> <p>25 Q. Was there any discussion about the fact that other than</p> <p style="text-align: center;">Page 113</p>	<p>1 MR BEER: -- have been located, they are in the process of</p> <p>2 being redacted and copied, a small number of questions</p> <p>3 will arise from those.</p> <p>4 THE CHAIRMAN: Yes.</p> <p>5 MR BEER: I would propose that we get on the questioning as</p> <p>6 it was, they are then distributed, Ms Cartwright is</p> <p>7 doing it at the moment, and then if CPs wish to ask</p> <p>8 questions about those, then do so then.</p> <p>9 THE CHAIRMAN: Are you likely to have any questions to ask</p> <p>10 about them?</p> <p>11 MR BEER: Yes, but I think it is fairer to do it when</p> <p>12 everyone has the notes in front of them.</p> <p>13 THE CHAIRMAN: Thank you.</p> <p>14 Mr Thomas, do you have questions for this witness?</p> <p>15 MR THOMAS: I do, sir.</p> <p>16 Questions from MR THOMAS</p> <p>17 MR THOMAS: Good afternoon, X7. My name is Mr Thomas,</p> <p>18 I represent Anthony's family. This is his mother who</p> <p>19 sits alongside me, okay?</p> <p>20 <b>A. Yes, sir.</b></p> <p>21 Q. You were informed that the subjects in the stolen Audi</p> <p>22 were apparently making off and ready for an off at about</p> <p>23 18.25. Do you remember that?</p> <p>24 <b>A. Not specifically, sir, but ...</b></p> <p>25 Q. I take that -- I can turn it up if I need to -- from</p> <p style="text-align: center;">Page 115</p>
<p>1 three principals who had made initial accounts, the</p> <p>2 remaining officers had not made an account at all and</p> <p>3 that the three principals had not made their fourth</p> <p>4 stage statements?</p> <p>5 <b>A. I really can't recall what was said specifically with</b></p> <p>6 <b>that officer, sir.</b></p> <p>7 MR BEER: Yes, thank you very much. Those are the questions</p> <p>8 that I ask.</p> <p>9 Sir, is that a convenient moment?</p> <p>10 THE CHAIRMAN: We will break off at that point.</p> <p>11 It has now just gone 1.00. We will resume at 2.10.</p> <p>12 MR BEER: Thank you, sir.</p> <p>13 THE CHAIRMAN: If you just hang on there for a second, until</p> <p>14 the usher comes to fetch you.</p> <p>15 (1.06 pm)</p> <p>16 (The Luncheon Adjournment)</p> <p>17 (2.30 pm)</p> <p>18 MR BEER: Sir, I wonder whether the curtain can be adjusted.</p> <p>19 THE CHAIRMAN: Yes. I think ...</p> <p>20 Thank you, Ms Curran. That is about right.</p> <p>21 Can everybody see?</p> <p>22 MR BEER: Sir, apologies for the delay, the notes of the</p> <p>23 risk assessment meeting that X7 referred to this</p> <p>24 morning --</p> <p>25 THE CHAIRMAN: Yes.</p> <p style="text-align: center;">Page 114</p>	<p>1 Mr Granby's log, where it says that he specifically</p> <p>2 informed you at 18.25 --</p> <p>3 <b>A. Yes, sir, I accept that.</b></p> <p>4 Q. Okay. You also accept that it would have been very</p> <p>5 important for you to have your ears open in relation to</p> <p>6 what the surveillance officers could see on the ground.</p> <p>7 They were your eyes, weren't they?</p> <p>8 <b>A. Absolutely, yes.</b></p> <p>9 Q. Yes.</p> <p>10 We have heard evidence from one of the surveillance</p> <p>11 officers who said that at 18.29 he broadcasted that</p> <p>12 Anthony Grainger was the driver. Do you remember that?</p> <p>13 <b>A. Not specifically, sir, but --</b></p> <p>14 Q. Any reason --</p> <p>15 <b>A. I don't dispute it.</b></p> <p>16 Q. No, okay. That is important, because in terms of the</p> <p>17 men in the car, you certainly had information in</p> <p>18 relation to Mr Totton?</p> <p>19 <b>A. Yes, sir.</b></p> <p>20 Q. You had information in relation to Mr Grainger?</p> <p>21 <b>A. Yes, sir.</b></p> <p>22 Q. You were unsure as to who the third passenger was; is</p> <p>23 that correct?</p> <p>24 <b>A. That's correct.</b></p> <p>25 Q. I am suggesting that before, before, the strike team, if</p> <p style="text-align: center;">Page 116</p>

<p>1 I can call it that, went into the car park --</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. -- you had had information at about, as I say, 18.29</p> <p>4 that Anthony was driving?</p> <p>5 <b>A. Yes, sir.</b></p> <p>6 Q. Right.</p> <p>7 Moving on.</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. X7, just remind us, how long had you been a firearms</p> <p>10 officer? Did you say you started in 2001?</p> <p>11 <b>A. Yes, sir.</b></p> <p>12 Q. By the time of this incident, what --</p> <p>13 <b>A. 10, 11 years.</b></p> <p>14 Q. 11 years?</p> <p>15 Would I be right in thinking that during that time</p> <p>16 the MP5 is a weapon of choice, isn't it, amongst</p> <p>17 firearms officers?</p> <p>18 <b>A. It depends on the tactic, sir.</b></p> <p>19 Q. Okay, but it is a weapon that you were very familiar</p> <p>20 with?</p> <p>21 <b>A. Yes, sir. It was the main -- when I first went on to</b></p> <p>22 <b>firearms it was the main weapon.</b></p> <p>23 Q. Main weapon. A weapon that undoubtedly you had trained</p> <p>24 with?</p> <p>25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 117</p>	<p>1 <b>A. Yes, sir.</b></p> <p>2 Q. Just have it open for the time being, we can come to the</p> <p>3 text of it in a moment.</p> <p>4 We know that in this case you were one of the</p> <p>5 officers, I think there were three in total, who did do</p> <p>6 an initial account?</p> <p>7 <b>A. Yes, sir.</b></p> <p>8 Q. We have your initial account, it runs to some nine pages</p> <p>9 of manuscript writing.</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. As you have already indicated to Mr Beer, your initial</p> <p>12 account didn't contain the detail and that would be</p> <p>13 because, and I am just looking at what this says now in</p> <p>14 the policy and procedures, you can follow it with me:</p> <p>15 "Detailed accounts should not normally be obtained</p> <p>16 immediately ..."</p> <p>17 There is good reason for that, yes?</p> <p>18 <b>A. Yes, sir.</b></p> <p>19 Q. Right:</p> <p>20 "... they can be left until the officers involved in</p> <p>21 the shooting are better able to articulate their</p> <p>22 experience in a coherent format, usually after at least</p> <p>23 48 hours."</p> <p>24 Yes?</p> <p>25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 119</p>
<p>1 Q. Fired on hundreds of times --</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. -- on shooting ranges and stuff like that, yes?</p> <p>4 <b>A. Yes, sir.</b></p> <p>5 Q. It is a weapon that we can agree you have a familiarity</p> <p>6 with in terms of its weight, size, dimensions and how it</p> <p>7 sounds?</p> <p>8 <b>A. Yes, sir.</b></p> <p>9 Q. You know that the sound of a gunshot from that weapon is</p> <p>10 very different to the sound of a collision from a car?</p> <p>11 <b>A. Yes, sir.</b></p> <p>12 Q. Can I take you to the manual. This is in relation to</p> <p>13 the post-incident procedure.</p> <p>14 Sir, I am looking in the manual. It is the policies</p> <p>15 and procedures manual --</p> <p>16 THE CHAIRMAN: Thank you.</p> <p>17 MR THOMAS: -- and it is page 384.</p> <p>18 I wonder if the officer could be shown that.</p> <p>19 <b>A. Thank you.</b></p> <p>20 MR THOMAS: Sir, I am going to paragraph 7.97.</p> <p>21 THE CHAIRMAN: Thank you.</p> <p>22 MR THOMAS: It is page 384, paragraph 7.97.</p> <p>23 Tell me when you are there, officer.</p> <p>24 <b>A. 7.97, sir.</b></p> <p>25 Q. Are you there?</p> <p style="text-align: center;">Page 118</p>	<p>1 Q. In this case, although you did your initial account, you</p> <p>2 had an opportunity to have some rest?</p> <p>3 <b>A. Yes, sir.</b></p> <p>4 Q. Reflect. You were not under any particular pressure in</p> <p>5 terms of doing your detailed account, because we know</p> <p>6 that your detailed account didn't come until 9 March,</p> <p>7 correct?</p> <p>8 <b>A. That's correct.</b></p> <p>9 Q. Some six days afterwards. Can you just confirm this,</p> <p>10 when you did your detailed account, you knew the</p> <p>11 importance of that detailed account, you knew the</p> <p>12 importance of that document?</p> <p>13 <b>A. Of course, yes.</b></p> <p>14 Q. Of course.</p> <p>15 I am saying this -- forgive me for stating the</p> <p>16 obvious, but you were aware that a man had died?</p> <p>17 <b>A. Yes, sir.</b></p> <p>18 Q. You were aware that there would be an investigation into</p> <p>19 that?</p> <p>20 <b>A. Yes, sir.</b></p> <p>21 Q. Yes?</p> <p>22 <b>A. Yes, sir.</b></p> <p>23 Q. I use the old fashioned phrase, but you were the bronze</p> <p>24 commander?</p> <p>25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 120</p>

<p>1 Q. Yes. And you knew that what you had done and that of 2 your colleagues would be subject to scrutiny at 3 a hearing at some subsequent date? 4 <b>A. Yes, sir.</b> 5 Q. Would it be fair to say that you thought long and hard 6 about what you put into your detailed account before you 7 put pen to paper? Would that be fair? 8 <b>A. Clearly it was on my mind, sir, yes.</b> 9 Q. Yes. Can I just take you then to firstly your initial 10 account, which isn't your detailed account, and I want 11 to take you to page 499 in the initial account. 12 THE CHAIRMAN: That will be divider 10, I think, of your own 13 bundle. 14 <b>A. Yes, sir.</b> 15 MR THOMAS: Just towards the bottom of that page, you said 16 that: 17 "I got out ..." 18 Do you see that, "I got out"?" 19 <b>A. Yes, sir.</b> 20 Q. "I got out, ran straight over to the driver. Around 21 this time (I cannot be specific) I heard a noise, I am 22 unsure if it was the sound of a firearm being discharged 23 or if it was the sound of vehicles colliding." 24 Yes? 25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 121</p>	<p>1 Q. Can we agree on this. By the time you came to do your 2 detailed account, after a period of reflection, knowing 3 the importance of this, in your mind this was more the 4 sound of vehicles colliding. That is what you say here, 5 isn't it? 6 <b>A. Sir, the statement reflected what I thought at the time.</b> 7 Q. That is what -- 8 <b>A. Yes, at the time I assumed it was the -- because the 9 noise wasn't loud enough.</b> 10 Q. Forgive me, X7, when we talk about at the time, I am at 11 the time discussing your detailed account on 9 March. 12 That is the only time I am looking at. 13 <b>A. Okay, sir.</b> 14 Q. Right? All I am putting to you is, so by the time you 15 came to do your detailed account, after the period of 16 reflection that I have already talked about, you knew 17 the enormity of this and all the rest of it. In your 18 mind you had discounted firearms, because you don't 19 mention firearms, and in your mind this was a sound of 20 vehicles colliding. Correct? 21 <b>A. I made an assumption that it was the sound of vehicles 22 colliding, because the noise that I heard just 23 didn't --wasn't loud enough --</b> 24 Q. Sound like gunfire? 25 <b>A. -- like a gunshot.</b></p> <p style="text-align: center;">Page 123</p>
<p>1 Q. That is what you said in your initial account before you 2 had time to reflect. The enormity of what had happened 3 had sunk in by the time you came to do your detailed 4 account? 5 <b>A. Yes, sir.</b> 6 Q. Let's look at your detailed account, if I may. 7 We know that you did your detailed account on 8 9 March after a period of reflection. Can I take 9 matters up, please, at page 89. 10 <b>A. Yes, sir.</b> 11 Q. The last couple of paragraphs. You do the countdown in 12 the second to last paragraph, yes, before the strike? 13 <b>A. Yes, sir.</b> 14 Q. Then the last paragraph you say this: 15 "I ran from my door, round the front of my vehicle 16 towards the driver of the Audi. My immediate intention 17 was to challenge the driver and to ensure that the 18 vehicle could not be used as a weapon. As I did this, 19 I heard a noise ..." 20 Then you say this: 21 "... I assumed it was the sound of vehicles 22 colliding." 23 Then you said you continued on to where the driver 24 was, correct? 25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 122</p>	<p>1 Q. Exactly, it didn't sound like gunshot, it sounded 2 like -- again these are not my words, these are your 3 words. 4 <b>A. I accept that, sir.</b> 5 Q. It sounded like the sound of vehicles colliding? 6 <b>A. Yes, sir.</b> 7 Q. To be clear on this, on 9 March 2012, after that period 8 of reflection, you had committed yourself to the fact 9 that you had discounted firearms, otherwise you would 10 have mentioned them? 11 <b>A. That is not the case, sir.</b> 12 Q. No? 13 <b>A. No.</b> 14 Q. Why didn't you then? 15 <b>A. At the time -- all I am doing is recording on my 16 statement what I thought at the time.</b> 17 Q. Yes. 18 Well, your statement, you know about the declaration 19 of truth, you have been a police officer for long 20 enough, that the contents of the statement needs to be 21 true to the best of your belief and knowledge and all 22 the rest of it. This is all trite to a police officer, 23 you know all of this, yes? 24 <b>A. Yes, sir.</b> 25 Q. At this time, you had discounted that this was</p> <p style="text-align: center;">Page 124</p>

1 a firearm?  
 2 THE CHAIRMAN: When you say "at this time", do you mean at  
 3 the time he made this statement or do you mean the time  
 4 he was talking about in the statement?  
 5 MR THOMAS: I am talking about at the time he made the  
 6 statement, sir.  
 7 **A. Okay. When I made the statement, sir, I was reflecting**  
 8 **what I thought at the time.**  
 9 Q. X7, it is clear that as of 9 March, you did not believe  
 10 you had heard a firearm discharged. Otherwise you would  
 11 have said so.  
 12 **A. That is not the case, sir.**  
 13 Q. All right.  
 14 Why didn't you say so then?  
 15 **A. I spoke to my legal adviser, whilst doing this and doing**  
 16 **statements, and he told me to record what I thought had**  
 17 **happened at the time. So that is how I recorded it.**  
 18 Q. Yes. That is what you believed, this was a vehicle  
 19 colliding?  
 20 **A. Yes.**  
 21 Q. Can I take you to a couple of photographs, please. Can  
 22 you go to bundle O, I think it might be -- I think you  
 23 have two bundle Os, but it is page number 162.  
 24 THE CHAIRMAN: That will be the first file, O1.  
 25 MR THOMAS: O1.

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1 THE CHAIRMAN: Could I have that reference again, please  
 2 Mr Thomas?  
 3 MR THOMAS: Of course, sir. 162.  
 4 THE CHAIRMAN: 162.  
 5 MR THOMAS: I am going to be looking at a series of  
 6 photographs from that page.  
 7 Are you there?  
 8 **A. Yes, sir.**  
 9 Q. Right, this is the vehicle you were travelling in.  
 10 **A. Yes, sir.**  
 11 Q. Okay. Can you see at the bottom of page 162, the second  
 12 photograph, there are two red arrows --  
 13 **A. Yes, sir.**  
 14 Q. -- showing some scuff marks on your vehicle?  
 15 **A. Yes, sir.**  
 16 Q. See that? We can see them in greater detail if you go  
 17 to page 163.  
 18 **A. Yes, sir.**  
 19 Q. You can see, again, there are two photographs there, the  
 20 upper photograph and the lower photograph, again showing  
 21 the scraping marks on your vehicle.  
 22 **A. Yes, sir.**  
 23 Q. Over the page, to 164, the top photograph. Yes?  
 24 **A. Yes, sir.**  
 25 Q. If you go to page 241 in the same bundle. Are you

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1 there?  
 2 **A. Yes, sir.**  
 3 Q. This is a photograph of your vehicle when it boxed in  
 4 the red Audi.  
 5 **A. Yes, sir.**  
 6 Q. You can see the contact that your vehicle made. This is  
 7 a photograph that was taken on the night of your vehicle  
 8 in situation, do you follow?  
 9 **A. Yes, sir.**  
 10 Q. Yes?  
 11 **A. Yes.**  
 12 Q. That was page 241. The next page I would like to take  
 13 you to, again just showing the way that your vehicle  
 14 scraped the Audi is page 438. That might be --  
 15 THE CHAIRMAN: That will be the other bundle.  
 16 MR THOMAS: That might be might be in the other bundle.  
 17 438.  
 18 **A. Yes, sir.**  
 19 MR THOMAS: Sir, it is a photograph that looks like this.  
 20 (Indicates)  
 21 THE CHAIRMAN: Yes, it is the actual bundle I am struggling  
 22 to -- I had it out earlier, Mr Thomas, but --  
 23 MR THOMAS: Sir, just use mine, because this is the last  
 24 point.  
 25 THE CHAIRMAN: I have it.

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1 MR THOMAS: 438, sir.  
 2 THE CHAIRMAN: Yes, thank you.  
 3 Yes.  
 4 MR THOMAS: The reason why I show you those series of  
 5 photographs, I have shown you the damage to your  
 6 vehicle, I am going to suggest the following  
 7 proposition. Can you, before I turn to the proposition,  
 8 go back to your detailed account, please, which is at  
 9 page 89.  
 10 Sir, you can close those bundles.  
 11 Now, when you called the strike, you and your  
 12 colleagues would have been at the ready or ready to  
 13 deploy from your vehicle, would that be fair?  
 14 **A. Yes, clearly there was a slight delay of me because of**  
 15 **the extra things I had to do, but yes, sir.**  
 16 Q. The whole purpose behind a strike such as this is -- you  
 17 tell me if you disagree -- for your men in your car to  
 18 deploy from their vehicle as quickly as they can,  
 19 correct?  
 20 **A. Yes, sir.**  
 21 Q. Go across to the subject vehicle and you know the  
 22 expression "shock and awe"?  
 23 **A. Yes, sir.**  
 24 Q. That is what you want to do, you want to get over there  
 25 as quickly as you can, shock and awe, surprise the

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1 occupants in the vehicle so that you secure compliance?  
 2 **A. That's correct.**  
 3 Q. In terms of doing that, you and your colleagues need to  
 4 deploy as quickly as you can, yes?  
 5 **A. That's the case, yes.**  
 6 Q. Now, because of the location of this vehicle, namely  
 7 this vehicle being right at the end of the car park,  
 8 close to the edge, you knew that the plan was to get  
 9 round to the driver's side as quickly as you could and  
 10 as smoothly as you could. Would that be fair?  
 11 **A. As quickly as I could, that's correct, yes.**  
 12 Q. Right. Forgive me, there is just one more photograph  
 13 I want to take you to, just to illustrate this point.  
 14 It is bundle O1/312.  
 15 Tell me when you are there, officer.  
 16 **A. Yes, sir.**  
 17 Q. Officer, what you should be looking at is a photograph  
 18 of your car, the car that you were travelling in --  
 19 **A. Yes, sir.**  
 20 Q. -- where it has T-boned the red Audi and you can see  
 21 that the front of your vehicle is over the hedge, which  
 22 is the hedge right at the far end of the car park?  
 23 **A. Yes, sir.**  
 24 Q. If we are looking at the same photograph, yes?  
 25 **A. Yes.**

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1 Q. What I am going to suggest is -- I am going to suggest  
 2 an alternative narrative, okay, and it is this.  
 3 Looking at that photograph, you were on the front  
 4 passenger side, correct?  
 5 **A. Correct.**  
 6 Q. You knew the position of the red Audi being right at the  
 7 very end of the car park, correct?  
 8 **A. Yes.**  
 9 Q. You also had intelligence, because you had your eyes on  
 10 the ground, the spotters or the surveillance officers,  
 11 who had been broadcasting the location of the red Audi.  
 12 Is that correct?  
 13 **A. Yes.**  
 14 Q. You knew the topography of the car park, you knew there  
 15 was a hedge at the end?  
 16 **A. Not necessarily, sir, no.**  
 17 Q. You certainly would have been aware of the hedge as your  
 18 vehicle was pulling in?  
 19 **A. No, sir. I wasn't.**  
 20 Q. I am going to suggest to you, officer, right, that the  
 21 one thing that you and I can agree on, that we don't  
 22 have any disagreement on, is by the time you reached the  
 23 driver's door, Anthony was alive, he was answering your  
 24 commands, you asked him to raise his hands and he raised  
 25 his hands, correct?

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1 **A. That's correct, yes.**  
 2 Q. We can agree on that?  
 3 **A. Yes, sir.**  
 4 Q. I am going to suggest to you, officer, that you deployed  
 5 from your vehicle as it was coming to a stop. You ran  
 6 round the front -- if you look at that photograph, you  
 7 will follow what I am saying, right. You ran around the  
 8 front of your vehicle, and you reached the driver's  
 9 side, as you have indicated earlier, and at some point,  
 10 at some point, when you are on your way round, we can  
 11 agree on this, you hear the sound?  
 12 **A. Yes, sir.**  
 13 Q. The sound that you say you hear, as in your witness  
 14 statement after a period of reflection, is it sounded  
 15 like vehicles colliding?  
 16 **A. Yes, sir.**  
 17 Q. I am going to suggest, officer, that is because your  
 18 vehicle was scraping the front of the red Audi as it was  
 19 coming to a stop, because you had deployed from the  
 20 vehicle beforehand? Isn't it?  
 21 **A. That is not the case, sir. The vehicle was stopped  
 22 before I deployed from it.**  
 23 Q. All right.  
 24 Let me move on.  
 25 Are you still on page 89 in your witness statement?

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1 **A. Yes, sir.**  
 2 Q. I have just read that last paragraph, I will read it  
 3 again:  
 4 "I ran from my door ... round the front of my  
 5 vehicle towards the driver of the Audi."  
 6 And you say what your immediate intention was, this  
 7 is the shock and awe, to challenge him, "Show me your  
 8 hands", that sort of thing?  
 9 **A. Yes, sir.**  
 10 Q. Right. Then we hear the noise, and I have dealt with  
 11 that sentence in the next paragraph.  
 12 Can we agree on this. By the time you got to the  
 13 driver's side, right, where Mr Grainger was sitting, you  
 14 had him covered, didn't you?  
 15 **A. Yes, sir.**  
 16 Q. Second thing we can agree on is you shouted a command,  
 17 "Show me your hands", yes?  
 18 **A. Yes, sir.**  
 19 Q. Mr Grainger did that, I think you said he did it from  
 20 the elbows?  
 21 **A. Yes, sir.**  
 22 Q. Just for the purpose -- in that position, yes?  
 23 (Indicates)  
 24 **A. Yes, sir.**  
 25 Q. Just for the purposes of the tape. What I am doing,

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<p>1 I am holding both my hands up --</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. -- in a surrender type position --</p> <p>4 <b>A. Correct, yes.</b></p> <p>5 Q. -- and my hands are, well, they are at my chin level,</p> <p>6 yes?</p> <p>7 <b>A. Yes, sir.</b></p> <p>8 Q. Yes?</p> <p>9 In other words, what you are saying is Mr Grainger's</p> <p>10 hands were clearly visible and they were above the</p> <p>11 dashboard, correct?</p> <p>12 <b>A. I don't know, because I was looking straight down at</b></p> <p>13 <b>him, sir, so in relation to the dashboard --</b></p> <p>14 Q. You are looking down, but we have agreed that the</p> <p>15 position of his hands are by his chin level. You have</p> <p>16 just agreed that?</p> <p>17 THE CHAIRMAN: Do you agree with that?</p> <p>18 <b>A. It was chest level I would say, sir, but that is ...</b></p> <p>19 Q. It is certainly the upper chest?</p> <p>20 <b>A. Yes, sir, I will agree with that. Okay.</b></p> <p>21 Q. Yes.</p> <p>22 Please can I take you to page 90, the third</p> <p>23 paragraph. I want to break this down and deal with it</p> <p>24 line by line, if I may.</p> <p>25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 133</p>	<p>1 was wearing gloves?</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. You say that you shouted instructions for him to keep</p> <p>4 his hands up?</p> <p>5 <b>A. Yes, sir.</b></p> <p>6 Q. Then the next thing you say is:</p> <p>7 "Moments later, I saw the CS dispersal canister come</p> <p>8 into and activate in the vehicle."</p> <p>9 <b>A. Yes, sir.</b></p> <p>10 Q. I just want to break that down and be clear on this.</p> <p>11 When you say "moments later", you are not talking about</p> <p>12 a period of some 10 to 13 seconds, are you?</p> <p>13 <b>A. No, sir.</b></p> <p>14 Q. I ask you that for a very specific reason, right. Do</p> <p>15 you still have your first account there?</p> <p>16 <b>A. Yes, sir.</b></p> <p>17 MR THOMAS: Page 500, sir.</p> <p>18 What you say there in the middle of the page:</p> <p>19 "Seconds later I saw a CS canister come in."</p> <p>20 We are just talking a couple of seconds, aren't we?</p> <p>21 <b>A. Yes, sir.</b></p> <p>22 Q. And again, just so that I am clear as to what your</p> <p>23 evidence is, your evidence is -- sorry, I should have</p> <p>24 put this to you.</p> <p>25 I am right, am I, that up until this point in time</p> <p style="text-align: center;">Page 135</p>
<p>1 Q. Because the first thing you say is, the first two words:</p> <p>2 "As instructed ..."</p> <p>3 This was a man who was complying with your commands,</p> <p>4 correct?</p> <p>5 <b>A. Yes, sir.</b></p> <p>6 Q. The command was "Show me your hands" and, as instructed,</p> <p>7 that is exactly what Mr Grainger did. He raised both of</p> <p>8 his hands in front of him.</p> <p>9 Pause there. Agreed?</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. The next thing I want us to see if we can reach</p> <p>12 agreement on is, Mr Grainger was sat in the driver's</p> <p>13 seat, correct?</p> <p>14 <b>A. Yes, sir.</b></p> <p>15 Q. You are to his right?</p> <p>16 <b>A. Yes, sir.</b></p> <p>17 Q. You say the next thing he does is he looked directly at</p> <p>18 you?</p> <p>19 <b>A. Yes, sir.</b></p> <p>20 Q. So he turned his head to look at you, correct?</p> <p>21 <b>A. Yes, sir.</b></p> <p>22 Q. So he turns and looks at you to the right?</p> <p>23 <b>A. Yes, sir.</b></p> <p>24 Q. Okay.</p> <p>25 The next thing you say, you said you noticed that he</p> <p style="text-align: center;">Page 134</p>	<p>1 there is nothing untoward about Anthony's behaviour that</p> <p>2 you wouldn't have expected? It is shock and awe, you</p> <p>3 have issued commands and this is a man who is complying</p> <p>4 with your commands, correct?</p> <p>5 <b>A. Correct.</b></p> <p>6 Q. In other words: there is nothing to indicate that there</p> <p>7 is anything at all wrong with the man.</p> <p>8 Correct?</p> <p>9 <b>A. I would say so, yes.</b></p> <p>10 Q. Yes, all right.</p> <p>11 We are just talking about a couple of seconds later,</p> <p>12 the canister comes in. I think you say you don't recall</p> <p>13 hearing the glass break?</p> <p>14 <b>A. No, sir.</b></p> <p>15 Q. But you do recall the canister coming in?</p> <p>16 <b>A. I recall the -- obviously the CS dispersing, sir.</b></p> <p>17 Q. When I said you do recall the canister coming in, the</p> <p>18 effects of it, that is the white powder dispersing into</p> <p>19 the vehicle, yes?</p> <p>20 <b>A. Correct.</b></p> <p>21 Q. Right. What we can agree on is this. I can take you to</p> <p>22 it if I need to, I hope I don't need to but I will.</p> <p>23 <b>A. Yes, sir.</b></p> <p>24 Q. You didn't hear the glass break, did you?</p> <p>25 <b>A. No, sir.</b></p> <p style="text-align: center;">Page 136</p>

<p>1 Q. But you don't dispute that the glass did break?</p> <p>2 <b>A. No, sir.</b></p> <p>3 Q. "No", you are not disputing it. You are agreeing with</p> <p>4 me?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. We know, because we have heard the evidence of the</p> <p>7 officer who put the canister in, X9, he says that he</p> <p>8 shattered the glass and he put the canister in. That is</p> <p>9 a sound you didn't hear?</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. But must have happened?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. May I suggest this, your concentration at this point in</p> <p>14 time was entirely on Mr Grainger. He was the person who</p> <p>15 you wanted to control and dominate at that point, yes?</p> <p>16 <b>A. That's correct.</b></p> <p>17 Q. Right. And that may well explain why you didn't hear</p> <p>18 the glass breaking?</p> <p>19 <b>A. Yes, sir.</b></p> <p>20 Q. Right. We can also agree on this, can't we, when the</p> <p>21 canister came into the vehicle, up until this point</p> <p>22 there was no sudden movements from Mr Grainger, was</p> <p>23 there, he was doing what you expected -- he raised his</p> <p>24 hands, he turned, he looked at you. This is what you</p> <p>25 would expect on an operation like this, correct?</p> <p style="text-align: center;">Page 137</p>	<p>1 was there?</p> <p>2 <b>A. Not that I saw, sir.</b></p> <p>3 Q. Well, again, you were in a very good position to see,</p> <p>4 because you were standing right over him?</p> <p>5 <b>A. That's correct.</b></p> <p>6 Q. Yes. In fact, out of all the firearms officers, at this</p> <p>7 point in time, you were the closest?</p> <p>8 <b>A. Yes, sir.</b></p> <p>9 Q. It is not -- to be clear on this, and forgive me for</p> <p>10 dotting the Is and crossing the Ts, it is not as if you</p> <p>11 suddenly looked away, is it?</p> <p>12 <b>A. No, sir.</b></p> <p>13 Q. You had your eyes focused on him?</p> <p>14 <b>A. Absolutely.</b></p> <p>15 Q. Can we agree on this. After this point, so after the CS</p> <p>16 canister goes into the car and after Mr Grainger has</p> <p>17 flinched, that is when his arms begin to drop?</p> <p>18 <b>A. Yes, sir.</b></p> <p>19 Q. As you said earlier, it wasn't Mr Grainger dropping one</p> <p>20 hand and then followed by another hand. Both arms fall</p> <p>21 together, correct?</p> <p>22 <b>A. That's correct.</b></p> <p>23 Q. It wasn't a sudden drop -- I am going to repeat your</p> <p>24 evidence that you said to Mr Beer this morning, "He</p> <p>25 lowered his hands very, very slowly". You used the word</p> <p style="text-align: center;">Page 139</p>
<p>1 <b>A. Yes, sir.</b></p> <p>2 Q. In other words, when I say there was no sudden</p> <p>3 movements, there was no movements that made you think up</p> <p>4 until this point in time he was a threat to you?</p> <p>5 <b>A. That's correct.</b></p> <p>6 Q. Are you still on page 90?</p> <p>7 <b>A. Yes, sir.</b></p> <p>8 Q. Because the next thing that you say happens is this. We</p> <p>9 have had the CS canister come in --</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. -- and then you said that the driver reacted to this by</p> <p>12 flinching slightly to his right?</p> <p>13 <b>A. Yes, sir.</b></p> <p>14 Q. You illustrated that this morning to Mr Beer?</p> <p>15 <b>A. Yes, sir.</b></p> <p>16 Q. He is flinching to the right because the canister has</p> <p>17 come in to his left?</p> <p>18 <b>A. Yes, sir.</b></p> <p>19 Q. Would I be right in saying this: that didn't surprise</p> <p>20 you because you saw that as a reaction to the CS going</p> <p>21 off?</p> <p>22 <b>A. Correct.</b></p> <p>23 Q. Let's see, so far we have had a lot of agreement. Let's</p> <p>24 see if we can agree this. Up until this point there was</p> <p>25 no sudden dropping of Mr Grainger's hands out of sight,</p> <p style="text-align: center;">Page 138</p>	<p>1 "very" twice this morning, that is what you said.</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. You were telling him, "Keep your hands up, raise your</p> <p>4 hands", yes?</p> <p>5 <b>A. Yes, sir.</b></p> <p>6 Q. It is only at that point, you didn't know what was going</p> <p>7 on, you thought he may have been reaching for a weapon,</p> <p>8 correct?</p> <p>9 <b>A. That's correct, yes.</b></p> <p>10 Q. But you don't shoot him?</p> <p>11 <b>A. No, sir.</b></p> <p>12 Q. In fact, from that, I think you say you struck him?</p> <p>13 <b>A. Yes, sir.</b></p> <p>14 Q. Trying to get him to comply, essentially?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Just one thing that we want to ask you about is -- just</p> <p>17 bear with me a second and I will just get the page</p> <p>18 reference.</p> <p>19 Sir, bundle A, page 265b, which is the post mortem</p> <p>20 report.</p> <p>21 THE CHAIRMAN: If you are referring to the report, are you</p> <p>22 likely to be referring to any details that relatives</p> <p>23 might find distressing?</p> <p>24 MR THOMAS: No, sir. This has been canvassed already.</p> <p>25 Do you have it? It is where it says, "(a) the</p> <p style="text-align: center;">Page 140</p>

<p>1 face", do you see that?</p> <p>2 THE CHAIRMAN: Do you have a page reference?</p> <p>3 MR THOMAS: Yes, 265 and it is b, 265b.</p> <p>4 THE CHAIRMAN: Thank you. Thank you.</p> <p>5 Thank you very much.</p> <p>6 Yes.</p> <p>7 MR THOMAS: Do you see where it says (a) and it says "face".</p> <p>8 Officer, do you have that?</p> <p>9 <b>A. Face, yes.</b></p> <p>10 Q. Can I just read you what that sentence says in the post</p> <p>11 mortem report. It says:</p> <p>12 "Within the upper forehead on the right side there</p> <p>13 was an abrasion 1 centimetre by 0.5 centimetre."</p> <p>14 Do you see that?</p> <p>15 <b>A. Yes, sir.</b></p> <p>16 Q. Can I just ask you this, when you were trying to secure</p> <p>17 compliance?</p> <p>18 <b>A. Yes, sir.</b></p> <p>19 Q. Did you hit Mr Grainger in that region, to --</p> <p>20 <b>A. Not to the face, sir, no.</b></p> <p>21 Q. No?</p> <p>22 <b>A. No.</b></p> <p>23 Q. Can I again just ask you this. You are not saying, are</p> <p>24 you, that when he slumped, his forehead came into</p> <p>25 contact with anything, are you?</p> <p style="text-align: center;">Page 141</p>	<p>1 <b>A. Yes, sir.</b></p> <p>2 Q. You said that you assumed that he may have fainted, you</p> <p>3 had seen this on previous occasions?</p> <p>4 <b>A. That's correct.</b></p> <p>5 Q. We know that he hadn't fainted, because we know that he</p> <p>6 had been shot.</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Can I continue the alternative narrative, if I may.</p> <p>9 On top of what you have said --</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. -- you don't hear the gunshot, correct?</p> <p>12 <b>A. I didn't associate the noise with the gunshot, that's</b></p> <p>13 <b>correct.</b></p> <p>14 Q. No.</p> <p>15 You don't hear the glass breaking?</p> <p>16 <b>A. That's correct.</b></p> <p>17 Q. You have given us an explanation as to why you may not</p> <p>18 have heard the glass breaking, because adrenaline is</p> <p>19 pumping, isn't it?</p> <p>20 <b>A. Yes, absolutely. Yes.</b></p> <p>21 Q. Because of the intelligence that you have been provided</p> <p>22 with, you have run across. You know, you have had it in</p> <p>23 your head that this is a gang that may have guns, yes?</p> <p>24 <b>A. Yes, sir.</b></p> <p>25 Q. You are obviously concerned about your safety and you</p> <p style="text-align: center;">Page 143</p>
<p>1 <b>A. Not that I saw, sir, no.</b></p> <p>2 Q. Not that you saw. Let me move on, that was just</p> <p>3 a detail I just wanted to clarify with you but let me</p> <p>4 come back to your narrative if I may.</p> <p>5 Can you close that and go back to your witness</p> <p>6 statement, at page 90.</p> <p>7 We are at the point then where both of his arms, at</p> <p>8 the same time, lower very, very slowly. You nudge him</p> <p>9 with your muzzle --</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. -- to get his compliance --</p> <p>12 <b>A. Yes, sir.</b></p> <p>13 Q. -- and there is no reaction, is there?</p> <p>14 <b>A. That's correct.</b></p> <p>15 Q. In fact, more than there is no reaction, he slumps and</p> <p>16 he slumps to his right?</p> <p>17 <b>A. That's correct, yes.</b></p> <p>18 Q. When I say "he slumps to his right", for the avoidance</p> <p>19 of any doubt, he slumps towards you, towards the</p> <p>20 driver's door?</p> <p>21 <b>A. Towards the driver's door, yes.</b></p> <p>22 Q. Not towards the middle of the car or towards where the</p> <p>23 passenger seat is, correct?</p> <p>24 <b>A. Correct.</b></p> <p>25 Q. You were there, watching this?</p> <p style="text-align: center;">Page 142</p>	<p>1 are concerned about the safety of your colleagues, yes,</p> <p>2 fair comment?</p> <p>3 <b>A. Yes. Yes.</b></p> <p>4 Q. Right. You get there, you don't hear the glass breaking</p> <p>5 but we know the glass did break. Correct?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. We know from your evidence that you are clearly there,</p> <p>8 you have the man covered, and he is complying with your</p> <p>9 instructions?</p> <p>10 <b>A. Correct.</b></p> <p>11 Q. Then after compliance with your instructions, and the</p> <p>12 sequence I suggest is important, the only involuntary</p> <p>13 movement that Mr Grainger makes is when he flinches when</p> <p>14 the CS gas gets put into the car?</p> <p>15 <b>A. Correct.</b></p> <p>16 Q. It is after that that he slumps and you discover he has</p> <p>17 been shot?</p> <p>18 <b>A. Correct.</b></p> <p>19 Q. Final topic, sir.</p> <p>20 You left the MASTS team after this incident, didn't</p> <p>21 you?</p> <p>22 <b>A. Yes, sir.</b></p> <p>23 Q. You left that team, we have seen your witness statement.</p> <p>24 Were you unhappy with the MASTS team?</p> <p>25 <b>A. No, sir.</b></p> <p style="text-align: center;">Page 144</p>

1 Q. Okay.  
 2 Tell us this, X7. There is what I am going to  
 3 describe as a curious thing in this case, right. And  
 4 the curious thing is, in terms of all the intelligence  
 5 that you firearms officers had, I know this was a gang  
 6 that you thought were planning an armed robbery, right,  
 7 we have heard all of that evidence. But we have also  
 8 heard that each of men in the car that you thought, I am  
 9 not talking about the third man that ended up on the  
 10 night but when you were planning the operation, you had  
 11 intelligence on three, correct?  
 12 **A. Yes, sir.**  
 13 Q. Out of the three, the one with the most serious criminal  
 14 record was Mr Totton?  
 15 **A. Yes, sir.**  
 16 Q. Yes?  
 17 He was the one who was thought to be the most  
 18 dangerous, yes?  
 19 **A. I would agree with that, sir.**  
 20 Q. This is the curious thing. So far -- I appreciate we  
 21 haven't heard from all the firearms officers, but I have  
 22 seen their witness statements -- not one officer has  
 23 come into that witness box, stood before this chairman  
 24 and has given an account as to how Mr Totton got out of  
 25 the car. You help us. You were right there. Did you

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1 see Mr Totton?  
 2 **A. No, sir.**  
 3 Q. You can provide us with no explanation as to how the  
 4 most dangerous person in this vehicle, when your tactics  
 5 were to surround the vehicle, shock and awe, dominate  
 6 the vehicle, you have no explanation as to how he got  
 7 out of the vehicle?  
 8 **A. It was not something I was looking for, sir.**  
 9 Q. You don't have an explanation, bearing in mind what you  
 10 have said, told us, right, if Anthony Grainger was  
 11 complying with your instructions, and you had the man on  
 12 aim, you couldn't see any reason, could you, when you  
 13 were there, to justify shooting Anthony. Could you?  
 14 **A. No, sir.**  
 15 Q. This was your first fatality, wasn't it?  
 16 **A. Yes, sir.**  
 17 Q. Do you remember that six-day period before you came to  
 18 make your witness statement?  
 19 **A. Yes, sir.**  
 20 Q. This must have been weighed very heavily on your mind,  
 21 because you are a human being and I am sure it would do.  
 22 **A. Yes, sir.**  
 23 Q. A man lost his life --  
 24 **A. Yes, sir.**  
 25 Q. -- in circumstances where you were thinking, "My

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1 goodness, from what I could see ..."  
 2 I know you cannot speak for other officers, but from  
 3 what you could see, you didn't see a reason for him to  
 4 be shot? From what you could see.  
 5 **A. From what I could see, that's correct.**  
 6 Q. Yes.  
 7 Tell me this, five days into this, before you make  
 8 your first detailed account, there is a meeting that is  
 9 arranged with the police firearms association, yes?  
 10 **A. Yes, sir.**  
 11 Q. Which takes place the day before you do your detailed  
 12 account?  
 13 **A. Yes, sir.**  
 14 Q. Right. At that meeting you have V53 attend, Mr Beer has  
 15 touched upon this, yes?  
 16 **A. Yes, sir.**  
 17 Q. You know who V53 is, he was the firearms officer in  
 18 Mark Duggan.  
 19 **A. Yes.**  
 20 Q. Another curious thing that I want you to help the  
 21 chairman with. How is it that this being your first  
 22 firearms fatality, you have this officer who comes down,  
 23 you have no recollection as to what V53 discussed. How  
 24 is that?  
 25 **A. It really, from -- it was just welfare, sir, there was**

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1 **nothing more to it than support, some welfare and that**  
 2 **was it really.**  
 3 Q. That is a different answer to the one that you provided  
 4 to Mr Beer this morning, because when Mr Beer asked you  
 5 that very same question, you said, "I just can't  
 6 remember what was discussed".  
 7 **A. I can't specifically remember what was discussed, sir,**  
 8 **but it was along those lines.**  
 9 Q. Last try. Here is this man who everybody knows about.  
 10 As a police officer you know about the Duggan case, it  
 11 sparked a riot?  
 12 **A. Yes, sir.**  
 13 Q. Here is this firearms officer who is involved in that,  
 14 coming along. What was he speaking to the team about,  
 15 tell us?  
 16 **A. I can't recall the specifics, sir.**  
 17 Q. Was there discussions about the post-incident procedures  
 18 that shouldn't have been discussed, officer?  
 19 **A. No, sir.**  
 20 MR THOMAS: Sir, that is all I ask.  
 21 Thank you very much.  
 22 THE CHAIRMAN: Thank you, Mr Thomas.  
 23 Mr Weatherby.  
 24 MR WEATHERBY: Yes, please.  
 25

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<p>1 Questions from MR WEATHERBY                  2 MR WEATHERBY: Officer, I only have a small number of                  3 questions for you. I ask questions on behalf of                  4 Mr Grainger's partner. For the avoidance of your doubt                  5 or others, I am not going to suggest what is being                  6 called an alternative hypothesis or alternative version,                  7 okay?                  8 <b>A. Yes, sir.</b>                  9 Q. Three topics.                  10 The first, I just want to clarify what happened                  11 around when Amber was declared to you.                  12 <b>A. Yes, sir.</b>                  13 Q. Could I ask you to look at the page from Mr Granby's                  14 billing that you looked at earlier, I am not sure                  15 whether you still have it in front of you. It is at                  16 bundle R, page 547.                  17 I think you now have two versions.                  18 Do you have that in front of you?                  19 <b>A. Yes, sir.</b>                  20 Q. 547?                  21 <b>A. Yes, sir.</b>                  22 Q. Do you remember Mr Beer was asking you about a series of                  23 calls, which we now know were calls from Mr Granby to                  24 you?                  25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 149</p>	<p>1 <b>A. Yes, sir.</b>                  2 Q. We know that it entered the car park at 18.45, yes?                  3 <b>A. Yes.</b>                  4 Q. Then we know that eyes were last for a period of perhaps                  5 15 minutes. The exact time doesn't matter for current                  6 purposes, but it is a long time?                  7 <b>A. Yes, sir.</b>                  8 Q. You have told us that there was great concern about                  9 that, yes?                  10 <b>A. From my point of view, definitely, yes.</b>                  11 Q. No doubt from others, yes?                  12 <b>A. Yes.</b>                  13 Q. That is the context, that is what has been going on, and                  14 you followed that not from a call from Mr Granby, you                  15 followed that from the surveillance feed?                  16 <b>A. That's correct.</b>                  17 Q. Yes. There is a call at 19.04.47 for 33 seconds. When                  18 you were considering this with Mr Beer earlier, that is                  19 the call where you surmised, you thought, that that                  20 might be the call where Amber was declared?                  21 <b>A. It could be that one or the one after, sir.</b>                  22 Q. That is where I am just headed, so help me with this.                  23 After Amber was declared, whichever call it was --                  24 <b>A. Yes.</b>                  25 Q. -- and before the actual vehicle strike, a minute or</p> <p style="text-align: center;">Page 151</p>
<p>1 Q. I want to pick it up from 18.25 --                  2 <b>A. Yes, sir.</b>                  3 Q. -- so 6.25. He is calling you there for about                  4 44 seconds. That is just before two of the subjects and                  5 the unknown man are getting into the subject vehicle,                  6 the Audi, in Boothtown, yes?                  7 <b>A. Yes.</b>                  8 Q. Am I right that you don't have a specific recollection                  9 of that conversation?                  10 <b>A. I don't. No, sir.</b>                  11 Q. No. Would you agree with me, it would be likely to be                  12 something along the lines of, "It appears that two of                  13 the subjects and an unknown man are approaching the                  14 subject vehicle, or they are going towards vicinity of                  15 it"? It is likely to be that at that time, isn't it?                  16 <b>A. It could well be, sir, I really -- I can't speculate.</b>                  17 Q. Yes.                  18 Then the next call from Mr Granby is nearly                  19 40 minutes later; 19.04.47?                  20 <b>A. Yes, sir.</b>                  21 Q. Which is touching 7.05, yes?                  22 <b>A. Yes, sir.</b>                  23 Q. During that period, we know that the two subjects and                  24 the unknown man have got into the car, the car has gone                  25 to Culcheth, yes?</p> <p style="text-align: center;">Page 150</p>	<p>1 five later, a comparatively short period after Amber was                  2 called, yes. Between Amber being called and the vehicle                  3 strike happening, there wouldn't have been a further                  4 call from Mr Granby, would there?                  5 <b>A. No, sir.</b>                  6 Q. No. Putting that together, can I suggest something, and                  7 I think you may be there already from your reaction                  8 a moment ago, that there was a call at almost 7.05 --                  9 <b>A. Yes, sir.</b>                  10 Q. -- and then he called you back a couple of minutes                  11 later, yes, or in fact a minute and a half after that                  12 call finished and in that 12-second call it is likely                  13 that that is when Amber was called.                  14 <b>A. Correct, yes.</b>                  15 Q. Does that all fit?                  16 <b>A. Yes, sir.</b>                  17 Q. Just to develop that slightly further, can I see whether                  18 I can jog your memory more. The call at about 7.05, do                  19 you think that might be Mr Granby saying, "We have got                  20 eyes back on", because that would concur with some of                  21 the other evidence that we have heard from DSU officers.                  22 If you don't remember --                  23 <b>A. I don't think it was, sir, but I really don't remember.</b>                  24 Q. It would be logical, wouldn't it?                  25 <b>A. Possibly, sir, yes.</b></p> <p style="text-align: center;">Page 152</p>

<p>1 Q. In any event, doing your best, you would agree that it 2 is likely that the Amber was called at about 19.07 in 3 that call? 4 <b>A. Yes, sir.</b> 5 Q. Thanks very much. 6 Second topic, I just want to get some clarity about 7 what you say happened once the vehicle strike is 8 happening. 9 <b>A. Yes, sir.</b> 10 Q. As I say, I am not putting any alternative to you at all 11 here. It is right, isn't it, that you have told us 12 today and I think you have never said anything other 13 than this, that you got out of the car only after it had 14 stopped? 15 <b>A. Correct.</b> 16 Q. You have always been consistent that the alpha car 17 stopped before you got out. 18 You are aware now today, and no doubt you were aware 19 before today, that there was very minor damage indeed to 20 the side of the alpha car? 21 <b>A. Yes, sir.</b> 22 Q. Therefore you now know that there was some form of 23 touching between the Audi and the alpha car? 24 <b>A. Yes, sir.</b> 25 Q. But very minor?</p> <p style="text-align: center;">Page 153</p>	<p>1 Q. Therefore the sound that you heard at that point, we can 2 exclude collision, can't we? 3 <b>A. Yes, sir.</b> 4 Q. Going back to your very first account. 5 <b>A. Yes, sir.</b> 6 Q. Turn this up if you want, but I was not going to invite 7 you to but the manuscript account that you dictated 8 effectively to Mr Black, I think. 9 <b>A. Yes, sir.</b> 10 Q. On the night -- on the night of the actual incident, 11 yes. 12 <b>A. Yes, sir.</b> 13 Q. Of course you would be in some kind of emotional state 14 at that point, yes? 15 <b>A. It had been a long day, I think it is fair to say.</b> 16 Q. It had been a long day, but matters were clear in your 17 mind that night? 18 <b>A. Yes, sir.</b> 19 Q. Yes. At that point, you have described it as either 20 a gunshot or a collision? 21 <b>A. Yes, sir.</b> 22 Q. Narrowing it down, it is clear, isn't it, on your 23 evidence today, that that was a gunshot? 24 <b>A. Yes, sir.</b> 25 Q. You hear that gunshot as you are at the passenger door,</p> <p style="text-align: center;">Page 155</p>
<p>1 <b>A. Yes, sir.</b> 2 Q. It would be stretching the word to say it was 3 a collision? 4 <b>A. Yes, sir.</b> 5 Q. So certainly that is not something that would have made 6 a big bang. 7 <b>A. I wouldn't have thought so, no, sir.</b> 8 Q. That would not account for any noise that you heard? 9 <b>A. I wouldn't have thought so, no.</b> 10 Q. Certainly there is no evidence that we have heard that 11 there was any other collision. 12 <b>A. No, sir.</b> 13 Q. Your evidence today is that the alpha car stops, 14 T-boning the Audi, you get out and then you hear this 15 noise? 16 <b>A. Yes, sir.</b> 17 Q. You have told us today that that was as you were at the 18 passenger side of the alpha car? 19 <b>A. Yes, sir.</b> 20 Q. At the door? 21 <b>A. There or thereabouts, sir, yes.</b> 22 Q. There or thereabouts? 23 <b>A. Yes, sir.</b> 24 Q. You are sure about that, are you not? 25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 154</p>	<p>1 or thereabouts? 2 <b>A. Yes, sir.</b> 3 Q. Then you make your way to the front of the alpha car? 4 <b>A. Correct.</b> 5 Q. Across the bonnet of the alpha car? 6 <b>A. Around the front of the vehicle.</b> 7 Q. I didn't mean literally across, I meant round the front 8 of it, between the front of it and the hedge. Yes? 9 <b>A. Yes, sir.</b> 10 Q. And then to the driver's door? 11 <b>A. That's correct.</b> 12 Q. Up to that point, you hear no further shot or indeed 13 anything else? 14 <b>A. No, sir.</b> 15 Q. From that point -- from that point onwards you are 16 focused on Anthony Grainger? 17 <b>A. Yes, sir.</b> 18 Q. So far as your evidence is concerned, there is nothing 19 that you can point to which would suggest he was shot 20 whilst you were there? 21 <b>A. That's correct.</b> 22 Q. It would be difficult to miss that, wouldn't it? 23 <b>A. Absolutely.</b> 24 Q. As you reached the car, can you just help us again, just 25 clarify, as you reached the driver's door, the window</p> <p style="text-align: center;">Page 156</p>

<p>1 was down --</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. -- was wound down, yes?</p> <p>4 <b>A. Yes, sir.</b></p> <p>5 Q. Can you help us what position Mr Grainger was in at that</p> <p>6 point, when you first reached the window?</p> <p>7 <b>A. He was sat looking forward, as far as I can remember.</b></p> <p>8 Q. Right, so sat in a normal driving position?</p> <p>9 <b>A. Yes, sir.</b></p> <p>10 Q. He wasn't slumped to his left-hand side?</p> <p>11 <b>A. No, sir, not as I saw.</b></p> <p>12 Q. No.</p> <p>13 And you are clear about that?</p> <p>14 <b>A. As clear as I can be, sir, yes.</b></p> <p>15 <b>MR WEATHERBY: Yes.</b></p> <p>16 <b>Thank you very much.</b></p> <p>17 <b>A. Thank you.</b></p> <p>18 THE CHAIRMAN: Mr Davies, I am just taking stock at this</p> <p>19 point. We started this afternoon a little late but we</p> <p>20 have been going for more than an hour and whether I take</p> <p>21 a break now or wait until we conclude this witness's</p> <p>22 evidence really depends on how long you and Ms Whyte are</p> <p>23 likely to be.</p> <p>24 If you can give me some idea I will take a decision.</p> <p>25 MR DAVIES: I am unlikely to be more than 10 minutes, on the</p> <p style="text-align: center;">Page 157</p>	<p>1 a report that Mr Grainger was identified as the driver</p> <p>2 of the vehicle.</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. That doesn't find any reflection in your account or</p> <p>5 witness statement.</p> <p>6 Eyes were then lost for a period --</p> <p>7 <b>A. Yes, sir.</b></p> <p>8 Q. -- on the subject vehicle. What I want to establish</p> <p>9 first of all is, when you were covering the driver of</p> <p>10 the subject vehicle of the scene, did you recognise him</p> <p>11 as Anthony Grainger or not know which of the two to</p> <p>12 three subjects it was that you had been considering?</p> <p>13 <b>A. It is not something I considered, sir. As far as I was</b></p> <p>14 <b>concerned he was the driver and his name was really not</b></p> <p>15 <b>that relevant to me.</b></p> <p>16 Q. Keep your voice up.</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. What I am getting at is, did you recognise, as close as</p> <p>19 you were to him, that in that dynamic situation that it</p> <p>20 was Anthony Grainger you were covering rather than</p> <p>21 Mr Totton or an unknown third subject?</p> <p>22 <b>A. I ran to the driver and I didn't recognise him as</b></p> <p>23 <b>Anthony Grainger or anybody else in that car, sir. As</b></p> <p>24 <b>far as I am concerned, he was the driver and that was</b></p> <p>25 <b>it.</b></p> <p style="text-align: center;">Page 159</p>
<p>1 other hand I would like to check the transcript of</p> <p>2 something earlier if that is possible.</p> <p>3 THE CHAIRMAN: Would you therefore welcome a break at this</p> <p>4 stage?</p> <p>5 MR DAVIES: Yes.</p> <p>6 THE CHAIRMAN: We will do that in that case, we will take</p> <p>7 a five-minute break now.</p> <p>8 If you just wait there while the usher comes to</p> <p>9 fetch you.</p> <p>10 Ms Whyte, do you have any idea how long you might</p> <p>11 be?</p> <p>12 MS WHYTE: Yes, far less than five minutes.</p> <p>13 THE CHAIRMAN: Thank you.</p> <p>14 (3.29 pm)</p> <p>15 (A short adjournment)</p> <p>16 (3.40 pm)</p> <p>17 THE CHAIRMAN: Yes, Mr Davies.</p> <p>18 Thank you, Ms Curran.</p> <p>19 Questions from MR DAVIES</p> <p>20 MR DAVIES: Thank you, X9. I am asking questions on behalf</p> <p>21 of Q9.</p> <p>22 I want to concentrate very directly on events at the</p> <p>23 scene.</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. At 18.29, according to surveillance evidence, there was</p> <p style="text-align: center;">Page 158</p>	<p>1 Q. Yes, but a driver who may have had access to a firearm?</p> <p>2 <b>A. Quite possibly, sir, yes.</b></p> <p>3 Q. Let me turn -- I am sorry if it is something of</p> <p>4 a revisit to a much trampled flowerbed, but I do it</p> <p>5 anyway -- to your accounts of your conduct and</p> <p>6 perspective on arrival at the scene, all right?</p> <p>7 <b>A. Yes, sir.</b></p> <p>8 Q. I just want to track through -- at the risk of trying</p> <p>9 everyone's patience -- the versions you have given in</p> <p>10 very short form. Tab 10 of your bundle.</p> <p>11 <b>A. Yes, sir.</b></p> <p>12 Q. I want to consider firstly what you heard, what you</p> <p>13 heard. Secondly, where you were.</p> <p>14 <b>A. Yes, sir.</b></p> <p>15 Q. Two twin points as we go through this.</p> <p>16 Looking at your initial statement on the night in</p> <p>17 tab 10. You have the paragraph on page 5, you have been</p> <p>18 taken to it several times, starting, "I got out?"</p> <p>19 THE CHAIRMAN: Page 499 you may have it as.</p> <p>20 <b>A. Thank you, sir.</b></p> <p>21 MR DAVIES: Thank you:</p> <p>22 "I got out and ran straight over to the driver.</p> <p>23 Around this time (I cannot be specific) I heard a noise.</p> <p>24 I am unsure if it was the sound of a firearm being</p> <p>25 discharged or if it was the sound of vehicles colliding.</p> <p style="text-align: center;">Page 160</p>

1 I ran to the driver's window, it was open ..."

2 You have just covered with my immediate predecessor

3 Mr Weatherby, the point that in the absence of a vehicle

4 collision, this description in the early hours of the

5 following morning logically suggests you heard

6 a firearm?

7 **A. Yes, sir.**

8 Q. If there was no collision to explain it --

9 **A. Yes, sir.**

10 Q. -- the alternative is a firearm?

11 **A. Correct.**

12 Q. You then provided a witness statement on 9 March, tab 1.

13 **A. Yes, sir.**

14 Q. It is the same passage again, you have been taken to.

15 THE CHAIRMAN: Page 90.

16 **A. Yes, sir.**

17 MR DAVIES: "I called 'strike' to the team ..."

18 I am going to pick it up there:

19 "... I ran from my door and around the front of my

20 vehicle towards the driver of the Audi. My immediate

21 intention was to challenge the driver and ensure the

22 vehicle could not be used as a weapon. As I did this,

23 I heard a noise."

24 Contextualising that on my first point, that is as

25 you are running. I take it?

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1 **A. It is whilst I was at the driver's side of my vehicle,**

2 **sir -- sorry, the passenger's side.**

3 Q. I will come on to that:

4 "I ran from my door and around the front of my

5 vehicle towards the driver of the Audi."

6 **A. Yes, sir.**

7 Q. You said what you intention was, then you said:

8 "As I did this, I heard a noise. I assumed it was

9 the sound of vehicles colliding and continued my effort

10 to get to the driver."

11 All right?

12 **A. Yes, sir.**

13 Q. We know it is not a vehicle colliding --

14 **A. Yes, sir.**

15 Q. -- and that next sentence says, "and continued my effort

16 to get to the driver".

17 **A. Yes, sir.**

18 Q. So you hadn't got there, had you?

19 **A. No, sir.**

20 Q. Next sentence:

21 "I cannot recall my exact position when I heard this

22 noise, as I didn't pay much attention to it."

23 **A. Correct.**

24 Q. "My priority at that time was the driver of the Audi."

25 **A. Yes, sir.**

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1 Q. Then you say:

2 "As I got to the driver's door of the Audi, I saw

3 the window was down. Though could not see the driver's

4 hands."

5 **A. Yes, sir.**

6 Q. Isn't the implication, if not the express effect of

7 this, that you were hearing this noise as you are

8 running from your door to the driver's door of the Audi

9 but before you get there?

10 **A. It was well before I got to the driver's door, sir.**

11 Q. You were interviewed about it, your tab 9, page 76 of

12 the interview and you were interviewed on

13 22 October 2014. Do you have that?

14 **A. Yes, sir.**

15 Q. I hope you have tab 9, page 76, the timer is 01.06.56.

16 **A. Yes, sir.**

17 Q. And you are being questioned about that very passage,

18 and they read it out to you, ending with the words, "...

19 as I did this I heard a noise".

20 **A. Yes, sir.**

21 Q. Then the questioner says:

22 "Obviously in the sentence before you have mentioned

23 about running around from the door, around the vehicle

24 and then challenged the door but as you did this

25 'I heard a noise'."

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1 **A. Yes, sir.**

2 Q. Question:

3 "Can you say at what point in that sentence you

4 heard a noise?"

5 It is reread to you, and your answer is:

6 "Yeah, so I think it is all there, isn't it. I mean

7 I am not going to be -- if I couldn't answer it then,

8 I certainly can't answer it now."

9 **A. Yes, sir.**

10 Q. "Question: is it possible that the noise was Q9's shot?

11 Is that possible?"

12 And you don't say it is, you basically say you don't

13 know. Correct? The point being you are not able to

14 give an exact position either in your statement or in

15 interview --

16 **A. No, sir.**

17 Q. -- for where you were when the noise was made?

18 **A. Correct.**

19 Q. In the course of your evidence today, to Mr Beer, 12.33,

20 your first two descriptions of where you were when you

21 heard this noise, were that you were at the driver's

22 door. Is that right?

23 **A. That was a mistake, obviously it should have been the**

24 **passenger door.**

25 Q. You said it twice to Mr Beer, that you were at your

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<p>1 driver's door when you heard this sound?</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 Q. That became you were at your passenger's door,</p> <p>4 effectively your door?</p> <p>5 <b>A. Yes, sir. It should have been my door, yes.</b></p> <p>6 Q. In interview you couldn't be certain where you were?</p> <p>7 <b>A. Well, I am still not certain where it was, sir, my</b></p> <p>8 <b>evidence is I was in and around a certain location,</b></p> <p>9 <b>I have never been specific as to where I was. I heard</b></p> <p>10 <b>a noise and I ignored the noise and carried on doing</b></p> <p>11 <b>what I was doing.</b></p> <p>12 Q. I certainly don't want to be unfair. This is</p> <p>13 an incredibly fast-moving event, isn't it?</p> <p>14 <b>A. Yes, sir.</b></p> <p>15 Q. You are pulling up, you have the responsibilities you</p> <p>16 have and you have told us already that there was</p> <p>17 a slight delay as you had to ditch your radio, your</p> <p>18 tablet or whatever in the front of your car before you</p> <p>19 started getting out?</p> <p>20 <b>A. Yes, sir.</b></p> <p>21 Q. You then get out, and at some point between getting out</p> <p>22 but before reaching the Audi's, the subject vehicle's,</p> <p>23 driver's door you hear this gunshot?</p> <p>24 <b>A. Yes, sir.</b></p> <p>25 Q. But you can't say where?</p> <p style="text-align: center;">Page 165</p>	<p>1 <b>A. No, sir.</b></p> <p>2 Q. And he wasn't in the vehicle when Mr Grainger was fed</p> <p>3 through the passenger side at the front in order to get</p> <p>4 him out of the vehicle?</p> <p>5 <b>A. That's correct, yes.</b></p> <p>6 Q. As to Mr Grainger's arms being up and the extent to</p> <p>7 which they were up, all right?</p> <p>8 <b>A. Yes, sir.</b></p> <p>9 Q. You said to Mr Beer, the first barrister to question you</p> <p>10 today, that they were "not ... full up ... I would say</p> <p>11 lower chest height".</p> <p>12 <b>A. Yes, sir.</b></p> <p>13 Q. That became to Mr Thomas, by way of agreement, "upper</p> <p>14 chest height"?</p> <p>15 <b>A. Yes, sir.</b></p> <p>16 Q. It is a dynamic and very difficult perspective,</p> <p>17 isn't it --</p> <p>18 <b>A. Yes, sir.</b></p> <p>19 Q. -- as to how high up these hands were?</p> <p>20 <b>A. Yes, sir.</b></p> <p>21 Q. In particular, from your perspective, you are not able</p> <p>22 to say, are you, what somebody would have seen looking</p> <p>23 in from a different perspective, most particularly in</p> <p>24 through the windscreen of the red Audi?</p> <p>25 <b>A. No, sir. I could see everything because I was literally</b></p> <p style="text-align: center;">Page 167</p>
<p>1 <b>A. No, sir.</b></p> <p>2 Q. You told Mr Beer that on arrival, you were not looking</p> <p>3 to your right --</p> <p>4 <b>A. No, sir.</b></p> <p>5 Q. -- to the subject vehicle, and you were not taking in</p> <p>6 the subject vehicle until you were virtually at the</p> <p>7 driver's door of it?</p> <p>8 <b>A. I think it would be fair to say as I rounded the front</b></p> <p>9 <b>of my vehicle, I started bringing my weapon up on aim.</b></p> <p>10 Q. What was happening in the front of the red Audi, the</p> <p>11 subject vehicle, up and until the point you rounded the</p> <p>12 front of your vehicle you cannot say?</p> <p>13 <b>A. Absolutely, sir, no.</b></p> <p>14 Q. At no point in any of your accounts, interviews or</p> <p>15 evidence to this Inquiry have you said you saw Mr Totton</p> <p>16 in the front passenger seat of the subject vehicle.</p> <p>17 <b>A. That's correct.</b></p> <p>18 Q. When did you first see Mr Totton at the scene?</p> <p>19 <b>A. I -- it was after I had called for the ambulance. It</b></p> <p>20 <b>was well into the op after the strike had taken place,</b></p> <p>21 <b>sir.</b></p> <p>22 Q. You did not see him in the front of the subject vehicle</p> <p>23 as you covered Mr Grainger from virtually next to him?</p> <p>24 <b>A. That's correct.</b></p> <p>25 Q. You didn't see him get out?</p> <p style="text-align: center;">Page 166</p>	<p>1 <b>on top of him.</b></p> <p>2 Q. You are not able to say that those hands, when raised at</p> <p>3 your command, were visible to somebody looking in</p> <p>4 through the windscreen?</p> <p>5 <b>A. No, sir.</b></p> <p>6 Q. You are clear though I think that the driver's window</p> <p>7 was open?</p> <p>8 <b>A. Yes, sir.</b></p> <p>9 Q. Mr Grainger was wearing gloves?</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 Q. So do you agree, if the explanation anyone offers for</p> <p>12 wearing gloves at the scene was that it was cold, it</p> <p>13 would be surprising to have the front driver's window</p> <p>14 open?</p> <p>15 THE CHAIRMAN: That is really a matter for me I think,</p> <p>16 isn't it, Mr Davies.</p> <p>17 MR DAVIES: Thank you.</p> <p>18 THE CHAIRMAN: Ms Whyte.</p> <p>19 Questions from MS WHYTE</p> <p>20 MS WHYTE: X7, you cannot see me but I hope you can hear me.</p> <p>21 I am asking questions on behalf of the Greater</p> <p>22 Manchester Police.</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Three short matters.</p> <p>25 Roughly how far do you say the Raven pub is from the</p> <p style="text-align: center;">Page 168</p>

<p>1 car park where this incident occurred?</p> <p>2 <b>A. It is difficult to say. I don't know, is the answer, it</b></p> <p>3 <b>is not far, certainly with within a minute or two's</b></p> <p>4 <b>maximum drive.</b></p> <p>5 Q. Thank you. It is on Warrington Road, isn't it, on the</p> <p>6 outskirts of Culcheth as you come in. Does that sound</p> <p>7 familiar?</p> <p>8 <b>A. It sounds familiar, yes.</b></p> <p>9 Q. When you came on to the car park, could you see any</p> <p>10 members of the public on the car park?</p> <p>11 <b>A. At the Raven or --</b></p> <p>12 Q. No, I'm so sorry, that is quite right. It is my fault.</p> <p>13 No, when you came on to the car park where the incident</p> <p>14 occurred did you see any members of the public on the</p> <p>15 car park?</p> <p>16 <b>A. No, there were no members of the public there.</b></p> <p>17 Q. During this incident and before Mr Grainger was</p> <p>18 extracted from the vehicle, did you hear any of your</p> <p>19 colleagues, or did you, shout to any member of the</p> <p>20 public to move away?</p> <p>21 <b>A. I certainly didn't and I don't recall any of my staff</b></p> <p>22 <b>doing, but that is not to say it didn't happen.</b></p> <p>23 Q. Thank you.</p> <p>24 I think you are aware that Mr Ian Arundale has</p> <p>25 prepared a detailed report about this matter.</p> <p style="text-align: center;">Page 169</p>	<p>1 alternative overt disruption tactics.</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. First of all, if Mr Arundale were to maintain that that</p> <p>4 is something that ought to have been given very serious</p> <p>5 consideration just before you called the strike, what</p> <p>6 would you say to that suggestion?</p> <p>7 <b>A. I would say it is quite a difficult thing to achieve, to</b></p> <p>8 <b>do it successfully. To do it safely, to disrupt</b></p> <p>9 <b>an operation at such a late stage when you would think</b></p> <p>10 <b>or there is a good possibility that the subjects are</b></p> <p>11 <b>about to commit an offence, basically handing the</b></p> <p>12 <b>initiative over from the police to the subjects.</b></p> <p>13 Q. As an opinion, it assumes there is no imminent threat to</p> <p>14 life, doesn't it?</p> <p>15 <b>A. It does sound that way.</b></p> <p>16 Q. How easy would it be for you and the colleagues in the</p> <p>17 three other cars to remain covert for an even longer</p> <p>18 amount of time, until it was absolutely clear whether</p> <p>19 this was a recce or a failed attempt at a robbery,</p> <p>20 without being obtrusive?</p> <p>21 <b>A. I think we could have remained covert until we obviously</b></p> <p>22 <b>are committed. I think the issue was the surveillance</b></p> <p>23 <b>officers, and as I understood it and as I remember it,</b></p> <p>24 <b>I think we wouldn't have had that surveillance</b></p> <p>25 <b>capability for very long.</b></p> <p style="text-align: center;">Page 171</p>
<p>1 <b>A. Yes.</b></p> <p>2 Q. One of his topics includes the question of what, if</p> <p>3 anything, in terms of an alternative scenario ought to</p> <p>4 have happened around about the time of the calling of</p> <p>5 State Amber and State Green. Do you recall that?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. One of the things he said, I think it is only fair that</p> <p>8 it is put to you and it hasn't been, is that assuming</p> <p>9 there is no imminent threat to life, a fast time review</p> <p>10 of the arrest tactics should have occurred at around</p> <p>11 about that time, of the calling of State Amber and</p> <p>12 before State Red was called. Do you recall that part of</p> <p>13 his report?</p> <p>14 Where he says that for example there should have</p> <p>15 been in effect a tactical pause and considerations made</p> <p>16 around, for example, marked uniform resources, including</p> <p>17 the four ARV Cheshire resources at Risley flooding the</p> <p>18 area, potentially to disrupt the subjects. Do you</p> <p>19 remember that part?</p> <p>20 <b>A. Yes, I do, yes.</b></p> <p>21 Q. Yes. With the suggestion that they could have been</p> <p>22 deployed immediately in order to do that?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Or some other arrest plan hatched after such disruption</p> <p>25 and at a place of the TFC's choosing, so those sort of</p> <p style="text-align: center;">Page 170</p>	<p>1 Q. You need to be close enough to be able to involve</p> <p>2 yourselves directly but far enough away to be invisible</p> <p>3 to the suspects; is that right?</p> <p>4 <b>A. That sounds fair, yes.</b></p> <p>5 Q. During exactly the same period, a considerable number of</p> <p>6 surveillance officers also have to remain covert around</p> <p>7 a static object?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Before you called the strike, what if any consideration</p> <p>10 did you give to an option other than a strike?</p> <p>11 <b>A. Once I am given an Amber from my tactical firearms</b></p> <p>12 <b>commander, unless there is something really obvious,</b></p> <p>13 <b>then I am going to effect the arrest. Because the TFC</b></p> <p>14 <b>is in charge of the operation, he considers the</b></p> <p>15 <b>threshold has been met and the subjects require</b></p> <p>16 <b>arresting. And unless I see anything significant to</b></p> <p>17 <b>contradict that order, then I will conduct the arrest.</b></p> <p>18 MS WHYTE: Thank you very much, X7.</p> <p>19 Thank you, sir.</p> <p>20 THE CHAIRMAN: Thank you.</p> <p>21 Mr Beer?</p> <p>22 MR BEER: Thank you, sir.</p> <p>23 Further questions from MR BEER</p> <p>24 MR BEER: In answer to that last question, do I take you to</p> <p>25 mean that because the authority had been given to you to</p> <p style="text-align: center;">Page 172</p>

<p>1 effect the arrests, you didn't consider other tactical 2 alternatives? 3 I think that was the question that Ms Whyte asked 4 you. 5 <b>A. Yes.</b> 6 Q. Whether in that moment you considered the other 7 alternatives or any alternatives like those suggested by 8 Mr Arundale. You said, "But I had been given authority 9 and therefore unless somebody significant occurs I am 10 going to effect the arrests?" 11 <b>A. That's correct, yes.</b> 12 Q. The plain answer is you didn't consider the 13 alternatives? 14 <b>A. I don't -- there were no other alternatives, as far as 15 I am concerned. At such a late stage the alternatives 16 are limited.</b> 17 Q. That is a different question as to whether you 18 considered whether there were any. Did you consider 19 whether there were any or did you just get on and effect 20 the arrest? 21 <b>A. I just effected the arrest, sir.</b> 22 Q. The second thing I would like to ask you about. You 23 were asked by Mr Davies about where were you when you 24 heard the noise? 25 <b>A. Yes, sir.</b></p> <p style="text-align: center;">Page 173</p>	<p>1 others, the SIO, Mr Cousen and the TFC, Mr Lawler -- 2 <b>A. Yes, sir.</b> 3 Q. -- on 1 March. If you can just help us with what some 4 of the things say and who is likely to have been the 5 provider of the information, please: 6 "2008, Lloyds TSB ..." 7 Then what does it say to the right of that? 8 <b>A. "Kirkham".</b> 9 Q. "Kirkham", thank you. 10 Then, "[Something] Street, Preston"? 11 <b>A. "Poolston Street, Preston."</b> 12 Q. Thank you: 13 "03.20 hours, bars on windows ..." 14 Perhaps if you just read it to us it will be easier. 15 THE CHAIRMAN: Before you do, can I make sure I have the 16 right page. Yes, I have the right page, thank you. 17 <b>A. "Bars on windows, into the toilet, waited for two staff. 18 Threatened with firearm, keys to the vault, tied up 19 staff. Hands free mobiles, walkie talkies, tied third 20 member of staff up. £250,000 to be confirmed off in 21 stolen Vectra, intel received."</b> 22 <b>Should I name that individual, sir?</b> 23 Q. Sorry? 24 <b>A. Should I name the individual?</b> 25 Q. Yes, you can do, David Cullen?</p> <p style="text-align: center;">Page 175</p>
<p>1 Q. You said this morning a couple of times, as Mr Davies 2 pointed out, that you were near the driver's door and 3 you told us that that was a mistake? 4 <b>A. Yes, sir.</b> 5 Q. You meant to refer to the passenger door? 6 <b>A. Yes, I did, sir, yes.</b> 7 Q. By "the passenger door", did you mean the passenger door 8 of the alpha vehicle? 9 <b>A. Yes, sir, I did.</b> 10 Q. Did you ever go near the driver's door of the alpha 11 vehicle? 12 <b>A. Oh no, sir. No.</b> 13 Q. Right. When you gave evidence this morning you said 14 that you were in and around the area of that door, 15 meaning the passenger door? 16 <b>A. That's correct, yes, sir.</b> 17 Q. Does that remain your recollection, when you heard the 18 noise you hadn't gone through the hedge? 19 <b>A. That's correct, yes, sir.</b> 20 Q. Thank you. 21 The third issue is the notes. I don't know whether 22 you have a copy of them in front of you. 23 <b>A. I have, yes.</b> 24 Q. You have, good. These are notes that you took in the 25 course of the risk assessment meeting with, amongst</p> <p style="text-align: center;">Page 174</p>	<p>1 <b>A. "David Cullen and Totton were celebrating."</b> 2 Q. Is that why earlier on today you said that the 3 information given to you in the course of this meeting 4 related to Mr Totton -- 5 <b>A. Yes, sir.</b> 6 Q. -- and not the other two subjects of the operation? 7 <b>A. That's correct, sir. That is the notes I took.</b> 8 Q. Who do you think gave you this information here, was 9 that the SIO? 10 <b>A. I would imagine so, yes.</b> 11 Q. So Mr -- 12 <b>A. Mr Cousen.</b> 13 Q. Mr Cousen, thank you. 14 The information that intel had been received that 15 Mr Totton was celebrating, was that the limit of the 16 information that he was responsible for the robbery? 17 <b>A. I would imagine so, sir, because I would have recorded 18 anything else that we were told.</b> 19 Q. Yes, and the next heading "Weapons" underlined: 20 "No current intelligence to put subjects in 21 possession of firearms." 22 <b>A. Yes.</b> 23 Q. Who was that from? 24 <b>A. I imagine it was Mr Cousen again.</b> 25 Q. Yes.</p> <p style="text-align: center;">Page 176</p>

<p>1 Then it says: 2 "Grainger, 1995, offence of sawn-off shotgun to lie 3 on file." 4 Again Mr Cousen, do you think? 5 <b>A. I would imagine so.</b> 6 Q. That doesn't get mentioned in either the oral or the 7 PowerPoint briefings of 2nd or 3rd, any reason for that, 8 that you didn't require that to be included? 9 <b>A. No, sir, I don't recall -- I don't recall why it wasn't 10 included.</b> 11 Q. Then there are two other pieces of information we don't 12 need to look at, then the last line it says: 13 "Before midnight ..." 14 Then does that say, "No strike"? 15 <b>A. "No strike".</b> 16 Q. What does that mean? 17 <b>A. I think it was suggested that if there was going to be 18 an offence committed, it wouldn't be before midnight.</b> 19 Q. I see. Was that consistent with the hypothesis you were 20 working on that this might be a break-in to premises 21 overnight, at night time, and then a lay in wait? 22 <b>A. Yes.</b> 23 Q. Consistently with the Preston robbery? 24 <b>A. Yes, sir.</b> 25 Q. Thank you.</p> <p style="text-align: center;">Page 177</p>	<p>1 Q. -- that happen to have cash on them? 2 <b>A. No, sir.</b> 3 Q. Can you remember whether that was the focus of 4 DI Cousen's attention? 5 <b>A. I think he was just trying to point out that they 6 were -- that it could be one of a number of premises 7 that they were looking at, sir. Because at that time we 8 simply didn't have the intelligence to suggest any 9 specific target.</b> 10 MR BEER: Thank you, that is all I ask in relation to those 11 notes. 12 Sir, those are the only additional questions I ask. 13 THE CHAIRMAN: Does anybody else have any questions arising 14 out of those notes, because that is being dealt with as 15 a separate topic? 16 Thank you very much. 17 That is the conclusion of this witness? 18 MR BEER: It is. Thank you, sir. 19 THE CHAIRMAN: Thank you, X7. That is the end of your 20 evidence, you are now free to go. 21 I don't need to rise do I, we have a suitable room. 22 If you would like to wait until the usher comes to 23 escort you away, please. 24 Is this to be filed, the copy notes, in 25 any particular bundle? Perhaps Ms Cartwright could tell</p> <p style="text-align: center;">Page 179</p>
<p>1 Then, the second page I am not going to ask you 2 anything about. 3 The third page, there is some information about 4 recess in Stoke, yes? 5 <b>A. Yes, sir.</b> 6 Q. Then halfway down the page, it says: 7 "Renault Megane left registered to Grainger, 8 Culcheth via Warrington Road, Jackson Street, 9 Common Lane. Car park in middle of shopping precinct. 10 Gloves and beanie/balaclava." 11 Yes? 12 <b>A. Yes, sir.</b> 13 Q. Then there are three addresses, or three things, 14 "Thomas Cook", "Cheshire", is that the Cheshire Building 15 Society? 16 <b>A. I would imagine so, sir, yes.</b> 17 Q. And a Post Office. Can you recall why they were 18 highlighted to you -- sorry, there is Barclays as well? 19 <b>A. Barclays and other banks there.</b> 20 <b>I think they are just highlighting potential 21 targets.</b> 22 Q. All of those are financial premises, aren't they? 23 <b>A. Yes, sir.</b> 24 Q. Not commercial premises -- 25 <b>A. No, sir.</b></p> <p style="text-align: center;">Page 178</p>	<p>1 us in due course. 2 MR BEER: It will be in due course. Thank you, sir. 3 G11, please. 4 G11 (sworn) 5 THE CHAIRMAN: Thank you, G11. 6 Would you mind standing, please, so that everyone 7 can hear you and you will also find it easier to 8 manipulate the various files that are going to be handed 9 to you throughout your evidence. 10 Yes, Mr Beer. 11 MR BEER: Thank you sir. 12 Questions from MR BEER 13 MR BEER: G11, my name is Mr Beer and I ask questions on 14 behalf of the Inquiry. To your left-hand side there 15 should be a cypher sheet, can you use that if you wish 16 to refer to other police officers? 17 If in your bundle, if you can open tab 1, please, 18 you should see a witness statement dated 9 March 2012 19 and your name. Is that right? 20 <b>A. Yes.</b> 21 Q. In tab 2, a witness statement dated 28 May 2012 in your 22 name? 23 <b>A. Yes.</b> 24 Q. We can skip tabs 3 and 4, because they are to do with 25 special measures, and then go lastly to your third</p> <p style="text-align: center;">Page 180</p>

<p>1 witness statement of 4 March 2014 --</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. -- in tab 5.</p> <p>4 Are the contents of those three witness statements</p> <p>5 true to the best of your knowledge and belief?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Thank you.</p> <p>8 Can you help us as to when you became a police</p> <p>9 officer, please?</p> <p>10 <b>A. I joined the police force in June 2003.</b></p> <p>11 Q. When did you become an AFO?</p> <p>12 <b>A. That would have been January 2009.</b></p> <p>13 Q. January?</p> <p>14 <b>A. 2009.</b></p> <p>15 Q. Thank you.</p> <p>16 In March 2012, what was your rank?</p> <p>17 <b>A. PC.</b></p> <p>18 Q. Does that remain the case?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Are you still serving?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. What was your role in March 2012?</p> <p>23 <b>A. I was a specialist firearms officer.</b></p> <p>24 Q. When had you become an SFO?</p> <p>25 <b>A. I had become an SFO about May 2011.</b></p> <p style="text-align: center;">Page 181</p>	<p>1 <b>A. No.</b></p> <p>2 Q. How many MASTS deployments had you been involved in</p> <p>3 before March 2012?</p> <p>4 <b>A. 10/15.</b></p> <p>5 Q. How many of those had resulted in some form of decisive</p> <p>6 action?</p> <p>7 <b>A. Maybe three or four.</b></p> <p>8 Q. Had any special munitions been deployed in any of those?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Which special munitions?</p> <p>11 <b>A. CSDC, and I think shotgun as well.</b></p> <p>12 Q. Did all three of them, or four of them, involve strikes</p> <p>13 on a car?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Had you deployed any of the special munitions, or not?</p> <p>16 <b>A. No.</b></p> <p>17 Q. Were you qualified to use special munitions?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Were you trained as a CTSFO?</p> <p>20 <b>A. By that time, I am not 100 per cent but I think so, yes.</b></p> <p>21 Q. You think by March 2012?</p> <p>22 <b>A. I think so, yes.</b></p> <p>23 Q. If I asked you what document or documents regulated the</p> <p>24 conduct of a MASTS operation, what would your answer be?</p> <p>25 <b>A. That would be the manual of guidance and they would be</b></p> <p style="text-align: center;">Page 183</p>
<p>1 Q. Were you trained in MASTS operations?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. When had you first become qualified to participate in</p> <p>4 a MASTS operation?</p> <p>5 <b>A. I believe that was October 2010.</b></p> <p>6 Q. What is your understanding of what MASTS is?</p> <p>7 <b>A. It is a mobile armed support to surveillance.</b></p> <p>8 Q. Beyond the explanation of the acronym, what does it in</p> <p>9 fact mean?</p> <p>10 <b>A. It is to give protection to surveillance officers.</b></p> <p>11 Q. And is that it?</p> <p>12 <b>A. It is also to assist in arrests of offenders.</b></p> <p>13 Q. How do you give protection to surveillance officers?</p> <p>14 <b>A. We are there as a firearms contingency.</b></p> <p>15 Q. Okay, so do you follow them around?</p> <p>16 <b>A. Not all the time, sometimes it is just by radio.</b></p> <p>17 Q. You might be laid up somewhere; is that right?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. You said to provide an arrest capability, did you say,</p> <p>20 or contingency?</p> <p>21 <b>A. Capability.</b></p> <p>22 Q. Capability?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Was that a frequent part of a MASTS deployment, that it</p> <p>25 resulted in an arrest?</p> <p style="text-align: center;">Page 182</p>	<p>1 <b>Greater Manchester's standard operating procedures.</b></p> <p>2 Q. Dealing with the SOP first, was that a document that you</p> <p>3 would have regular recourse to or is it the kind of</p> <p>4 thing that you just saw in training?</p> <p>5 <b>A. Just in training.</b></p> <p>6 Q. What about the manual of guidance, the same?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. By March 2012 did you consider yourself to be</p> <p>9 occupationally and operationally competent as an SFO</p> <p>10 participating in a MASTS operation?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Before Operation Shire commenced, did you have any</p> <p>13 knowledge of Anthony Grainger?</p> <p>14 <b>A. No.</b></p> <p>15 Q. Did you have any knowledge of Robert Rimmer?</p> <p>16 <b>A. No.</b></p> <p>17 Q. Did you have any knowledge of David Totton?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. What was your knowledge of David Totton?</p> <p>20 <b>A. I knew of him from my time serving over at Salford</b></p> <p>21 <b>division.</b></p> <p>22 Q. How long had you worked on the division in Salford?</p> <p>23 <b>A. About five years.</b></p> <p>24 Q. What did you learn about Mr Totton as a result of</p> <p>25 working on the Salford division?</p> <p style="text-align: center;">Page 184</p>

1 **A. I knew him as a member of an OCG, organised crime group.**  
 2 Q. What time was this, that you worked on Salford division?  
 3 **A. Between 2003 and 2008.**  
 4 Q. When it came to your deployment on 3 March 2012, did you  
 5 tell anyone else about what you knew of Mr Totton by  
 6 reason of serving on Salford division?  
 7 **A. No.**  
 8 Q. Did what you knew about Mr Totton affect the way you  
 9 acted at all on 3 March?  
 10 **A. No.**  
 11 Q. When did you first become involved in Operation Shire,  
 12 as far as you can now recall?  
 13 **A. I think it was around December 2011.**  
 14 Q. Were you deployed a number of times in December 2011 on  
 15 Operation Shire?  
 16 **A. Yes.**  
 17 Q. Can you remember whether the focus of attention was then  
 18 members of the Corkovic family?  
 19 **A. I can't remember.**  
 20 Q. You can't remember now?  
 21 **A. No.**  
 22 Q. To what extent did you take into account any information  
 23 that you received or intelligence you received  
 24 in December 2011 when you were deployed on 3 March the  
 25 following year?

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1 **A. To be honest, we just take the information what is given**  
 2 **on the day.**  
 3 Q. Is that a general principle, you think, that most  
 4 firearms officers work on?  
 5 **A. Yes.**  
 6 Q. Why is that, that you go off what you are told on the  
 7 day and not before?  
 8 **A. Information and intelligence can change from day to day.**  
 9 Q. It is the proper and wise thing to do, to go off the  
 10 briefing that you get?  
 11 **A. Yes.**  
 12 Q. Yes?  
 13 Did you become involved in Operation Shire, the  
 14 deployment on 2 March 2012?  
 15 **A. I can't recall.**  
 16 Q. Do you remember being deployed twice in quick succession  
 17 on 2 March?  
 18 **A. I don't know, I can't recall.**  
 19 Q. According to the records that we have, you weren't  
 20 turned out on 2 March, only 3 March. Okay?  
 21 **A. Yes.**  
 22 Q. What do you remember as to your first involvement in the  
 23 deployment of 3 March?  
 24 **A. As in?**  
 25 Q. You were called in, presumably, the night before. Is

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1 that right?  
 2 **A. Yes.**  
 3 Q. What, you get a call which says, "Please turn out for  
 4 an early morning briefing"?  
 5 **A. Yes.**  
 6 Q. Yes. If you look, please, in tab 1 of your bundle, we  
 7 can see your witness statement of 9 March 2012, yes?  
 8 **A. Yes.**  
 9 Q. Do you have that?  
 10 **A. Yes.**  
 11 Q. You say:  
 12 "On ... 3 March I started my tour of duty at  
 13 04.30 hours."  
 14 Yes?  
 15 **A. Sorry, wrong tab.**  
 16 Q. The second paragraph:  
 17 "On Saturday, 3 March I started my tour of duty at  
 18 04.30 hours."  
 19 **A. Yes.**  
 20 Q. When you started compiling this statement, on the Friday  
 21 of the following week, yes?  
 22 **A. Yes?**  
 23 Q. Did you refer to anything when you were compiling it?  
 24 **A. There was -- from memory there was a flip chart in the**  
 25 **room that we were, with times on.**

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1 Q. Do you know who wrote the flip chart?  
 2 **A. Not from memory, no.**  
 3 Q. Was it written up before you arrived or did you each  
 4 contribute to it?  
 5 **A. I am not sure.**  
 6 Q. If you look to your left-hand side, just up on the  
 7 bench.  
 8 THE CHAIRMAN: Just here. There we are, Ms Curran is going  
 9 to hand it to you.  
 10 MR BEER: We have some photocopies of the flip chart, yes?  
 11 **A. Yes.**  
 12 Q. Can you see it says "Tour of duty, 4.30", on the first  
 13 one?  
 14 **A. Yes.**  
 15 Q. Do you think that is where you got the time from?  
 16 **A. Yes.**  
 17 Q. Can you see in your statement, you say:  
 18 "I attended a firearms briefing at about  
 19 06.00 hours."  
 20 That time is on there as well. Yes, "Briefing  
 21 starts 0600 hours". Yes?  
 22 **A. Yes.**  
 23 Q. Can you see in your witness statement on the second  
 24 page, you say:  
 25 "At about 18.15 hours, I returned to the charlie

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1 vehicle, took hold of my carbine, I was driven to the  
 2 Culcheth area of Cheshire."  
 3 Yes?  
 4 **A. Yes.**  
 5 Q. On the flip chart it says:  
 6 "At 18.15, leave Leigh police station, Green."  
 7 Do you think you got that from there as well?  
 8 **A. Yes.**  
 9 Q. Then by the first hole-punch it says:  
 10 "At 19.08 hours our vehicle was moved towards  
 11 Culcheth and I was informed we were now on State Amber."  
 12 In the flip chart it says, "19.08, State Amber."  
 13 **A. Yes.**  
 14 Q. Do you think you got that from there?  
 15 **A. Yes.**  
 16 Q. Similarly the State Red time, 19.12, do you think you  
 17 got that from there?  
 18 **A. Yes.**  
 19 Q. Where did these times come from, that were on the flip  
 20 chart?  
 21 **A. I am not 100 per cent sure.**  
 22 Q. Given that, why were you happy to use them?  
 23 **A. It was information that was being put up around timings**  
 24 **and I just assumed that that had come from the other**  
 25 **officers deployed.**

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1 **Yes.**  
 2 Q. In any event, you attended a briefing on the morning of  
 3 3 March at about 6.00 in the morning, yes?  
 4 **A. Yes.**  
 5 Q. You were told you were going to be in charlie vehicle,  
 6 and you were going to be charlie 2, which is rear  
 7 offside passenger?  
 8 **A. Yes.**  
 9 Q. If you take out the general firearms binder, please,  
 10 number 2, and turn up tab 22, please. This is a copy of  
 11 the briefing that was presented, okay?  
 12 **A. Okay.**  
 13 Q. If we look at the second page, I think we can see that  
 14 you are listed in the right-hand column as being  
 15 present, yes?  
 16 **A. Yes.**  
 17 Q. If we go over to the next page, 1267, we can see the  
 18 intelligence case that was presented, yes?  
 19 **A. Yes.**  
 20 Q. Do you see the first paragraph there:  
 21 "The subjects of this operation are believed to be  
 22 engaged in armed robberies in the north-west region."  
 23 The words, "Engaged in armed robberies", how would  
 24 you interpret that, in particular would you interpret it  
 25 to mean "using firearms and only firearms" or "possibly

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1 firearms but could be other weapons"?  
 2 **A. Possibly firearms, could be other weapons.**  
 3 Q. Similarly, if you look at page 1268, 1269 and 1270, the  
 4 intent of each of the subjects is said to be "conspiracy  
 5 to commit armed robbery". The use of the words "armed  
 6 robbery" there, again would you interpret that in the  
 7 same way?  
 8 **A. Yes.**  
 9 Q. It is any weapon which could be but isn't necessarily  
 10 a firearm?  
 11 **A. Yes.**  
 12 Q. Okay.  
 13 Going back to 1267, the second paragraph is:  
 14 "There is intelligence to suggest that these  
 15 subjects were responsible in 2008 for a robbery in  
 16 Preston where they broke into a bank."  
 17 Yes?  
 18 **A. Yes.**  
 19 Q. The information that you are being presented there, that  
 20 it was "these subjects", did you understand that to mean  
 21 the three men that you were then told about?  
 22 **A. Yes.**  
 23 Q. How would you treat intelligence like that?  
 24 **A. As being truthful.**  
 25 Q. Why would you treat it as being truthful?

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1 **A. Because we are being told it on a firearms briefing.**  
 2 Q. You assume that it has gone through an exquisite system  
 3 of checking; is that right?  
 4 **A. Yes.**  
 5 Q. With particular care being paid to it, yes?  
 6 **A. Yes.**  
 7 Q. Why would you assume that?  
 8 **A. My firearms training says that if intelligence is given**  
 9 **to you, it has gone through a process.**  
 10 Q. Sorry, I missed that?  
 11 **A. It has gone through a process.**  
 12 THE CHAIRMAN: "My firearms training tells me that if  
 13 intelligence is given, it has gone through a process."  
 14 Is that right?  
 15 **A. Yes.**  
 16 MR BEER: Thank you.  
 17 THE CHAIRMAN: Can you keep your voice up, please?  
 18 Thank you.  
 19 MR BEER: Would you regard that as significant information  
 20 you were being given in the context of the operation you  
 21 were to be deployed on?  
 22 **A. It is information.**  
 23 Q. And no more and no less than that?  
 24 **A. Yes.**  
 25 Q. Then over the page, please, to the threat assessment.

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<p>1 You can see that Mr Totton has three warnings recorded 2 against his name there, under the heading "Capability"?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. What is your understanding of the system of warning 5 markers?</p> <p>6 <b>A. It is something placed on GMP's system to flag up 7 potential involvement with this particular subject, 8 their past history.</b></p> <p>9 Q. Okay. Do you understand that it is based on 10 intelligence information, arrest information, conviction 11 information or all of the above?</p> <p>12 <b>A. All three, yes.</b></p> <p>13 Q. Here, you can see that you are told three things but it 14 doesn't tell you which of those, whether it is 15 intelligence, arrest or conviction, it is.</p> <p>16 Again, how would you treat that information?</p> <p>17 <b>A. Just as information.</b></p> <p>18 Q. What do you mean by that answer?</p> <p>19 <b>A. It is information what has gone through a process and is 20 being delivered to me as being truthful.</b></p> <p>21 Q. Was it the same answer before, that your training led 22 you to believe that it had been through this system 23 within GMP, that you would treat it as accurate?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. Is that right?</p> <p style="text-align: center;">Page 193</p>	<p>1 Q. How do you treat it if nothing is said about the issue 2 of firearms?</p> <p>3 <b>A. That there is potential that they may have or may not.</b></p> <p>4 Q. Nothing more than that?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. You deployed from Openshaw to Leigh police station; is 7 that right?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. You stayed laid up at Leigh police station for the rest 10 of the day until about 6.00 or 7.00 that night?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. What did you do whilst you were at Leigh police station?</p> <p>13 <b>A. I just rested.</b></p> <p>14 Q. Did you sleep at all?</p> <p>15 <b>A. I can't recall.</b></p> <p>16 Q. When you came to be deployed at about 6.00 or 7.00 that 17 night, did you feel fatigued at all?</p> <p>18 <b>A. Not that I recall, no.</b></p> <p>19 Q. When you moved from Leigh police station, to State 20 Green, can you recall now what the cause of you moving 21 from Leigh police station was?</p> <p>22 <b>A. No.</b></p> <p>23 Q. If you look at page 2 of tab 1 of your first statement. 24 You can put that big bundle away, thank you.</p> <p>25 <b>A. All right.</b></p> <p style="text-align: center;">Page 195</p>
<p>1 <b>A. Yes.</b></p> <p>2 Q. Does that apply to the warnings for Mr Rimmer over the 3 page and for Mr Grainger over the following page?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Yes?</p> <p>6 In the PowerPoint briefing that was deployed for you 7 and in the oral briefing that was given by 8 Superintendent Granby and X7, the OFC, they didn't make 9 a statement between the pair of them as to the 10 assessment of whether the subjects would be carrying 11 firearms or not. We can see that because we have the 12 briefing and we have the recording.</p> <p>13 <b>A. Okay.</b></p> <p>14 Q. Was it normal for the TFC and the OFC to give some form 15 of assessment as to the likelihood that the subjects may 16 have firearms with them?</p> <p>17 <b>A. Not necessarily firearms, no. I would have expected if 18 there was any positive intelligence saying that they had 19 firearms at this particular time that that would be 20 given.</b></p> <p>21 Q. You had been to briefings where such positive 22 information had been given?</p> <p>23 <b>A. No.</b></p> <p>24 Q. Right. You hadn't?</p> <p>25 <b>A. No.</b></p> <p style="text-align: center;">Page 194</p>	<p>1 Q. Tab 1, page 2.</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. At the top of the page, second paragraph, you say: 4 "I was driven to the Culcheth area of Cheshire, this 5 is known as State Green during a MASTS tactic. Whilst 6 en route to this area I was told the subjects of the 7 operation were in a stolen red Audi A6, registration 8 number ..."</p> <p>9 Then you set it out, yes?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. You say there you were told the subjects of the 12 operation were in the stolen red Audi. By that did you 13 mean the three men that we have just looked at?</p> <p>14 <b>A. As far as I was aware, yes.</b></p> <p>15 Q. So when you were deploying that night, you thought that 16 you were dealing with the three men that you had been 17 briefed about?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Did you then park up at the Raven Inn in Warrington 20 Road?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Yes?</p> <p>23 At the junction with Hey Shoot Lane?</p> <p>24 <b>A. Yes.</b></p> <p>25 MR BEER: Thank you.</p> <p style="text-align: center;">Page 196</p>

1 Sir, might that be a convenient moment?  
2 THE CHAIRMAN: Yes.  
3 Thank you, Mr Beer.  
4 We are going to break off until what time tomorrow,  
5 Mr Beer, have we lost time today?  
6 MR BEER: We have a little bit, sir, yes.  
7 As a compromise, could I suggest 10.15?  
8 THE CHAIRMAN: Certainly. I mean if you think 10.00 is  
9 better, I am prepared to do it. I have to take into  
10 account difficulties that Ms Hadfield-Grainger may have.  
11 She has been able to manage it so far, for which I am  
12 grateful.  
13 MR BEER: Sir, I am content with 10.15, thank you.  
14 THE CHAIRMAN: All right, 10.15 then tomorrow.  
15 Please do not discuss your evidence with anybody  
16 else overnight all right? Back here tomorrow for 10.15.  
17 Just hang on there for the moment and the usher will  
18 come and fetch you.  
19 (4.32 pm)  
20 (The Inquiry adjourned until 10.15 am the following day)  
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