

<p>1 Thursday, 13 April 2017 2 (10.15 am) 3 THE CHAIRMAN: Yes, Ms Cartwright. 4 MS CARTWRIGHT: Good morning, sir. 5 We move to the delta vehicle today. Could I call, 6 please, N7. 7 N7 (sworn) 8 THE CHAIRMAN: Thank you, N7. Would you mind remaining 9 standing, please. It will make it easier for people to 10 hear you and it will be easier to handle the documents 11 in front of you. 12 A. Yes. 13 Questions from MS CARTWRIGHT 14 MS CARTWRIGHT: Good morning, N7, my name is 15 Sophie Cartwright and I ask questions on behalf of the 16 Inquiry. You should have to the left-hand side of you 17 a sheet of paper that has the various cyphers of the 18 officers contained upon it. If at any point you want to 19 refer to an officer, please ensure you use their cypher. 20 A. Yes. 21 Q. In addition, you have a bundle in front of you which is 22 your bundle containing your various witness statements. 23 Could I ask you first of all to turn behind tab 1. 24 Do you see there your statement dated 9 March 2012? 25 A. Yes.</p> <p style="text-align: center;">Page 1</p>	<p>1 A. I am, yes. 2 Q. Could you assist as to what your role was in March 2012? 3 A. I was part of the firearms operations team, as a CTSFO. 4 Q. If we can perhaps just break that down. Can you assist, 5 when did you become an SFO? 6 A. I think it was around about 2008/2009. 7 Q. When did you become a CTSFO? 8 A. That would be end of 2010/2011. 9 Q. Were you trained in MASTS operations? 10 A. Yes, I was. 11 Q. When had you first become qualified to participate in 12 a MASTS operation? 13 A. That would be the back end of 2007. 14 Q. Could you assist the Inquiry as to what your 15 understanding is of what a MASTS operation is, please? 16 A. Yes. It is a mobile armed support to surveillance, 17 whereby covert firearms officers are deployed to support 18 a surveillance operation and also provide arrest options 19 if required, whether that be vehicle, building or on 20 foot. 21 Q. Can you assist, prior to March 2012 how frequently you 22 have participated in a MASTS deployment that have 23 resulted in an arrest? 24 A. That resulted in arrest? Dozens really, I can't -- 25 I wouldn't like to put a figure on.</p> <p style="text-align: center;">Page 3</p>
<p>1 Q. We can move then, please, to tab 2. Do you have there 2 your second witness statement, dated 25 May 2012? 3 A. Yes. 4 Q. Thank you. Turning then please to tab 3, your third 5 statement dated 25 August 2012? 6 A. Yes. 7 Q. I am going to skip over the statements behind tab 4 and 8 tab 5, because they relate to your application for 9 special measures, but could you then please finally turn 10 behind tab 6 where we see a statement dated 11 6 August 2014? 12 A. Yes, that's correct. 13 Q. Can I ask you, please, N7, can you confirm that the 14 contents of each of those witness statements are true to 15 the best of your knowledge and belief? 16 A. Yes, they are. 17 Q. Thank you. 18 Can you assist the Inquiry as to when you first 19 became a police officer, please? 20 A. Yes, that was January 1997. 21 Q. Thank you. In March 2012, what was your rank? 22 A. I was a Police Constable. 23 Q. Is that still the case? 24 A. That is, yes. 25 Q. Are you still serving?</p> <p style="text-align: center;">Page 2</p>	<p>1 Q. Can you assist, had special munitions been deployed in 2 any of those occasions? 3 A. Yes, they have been. 4 Q. Which special munitions? 5 A. Both the shotgun of tyres and the deployment of the CSDC 6 dispersal canister. 7 Q. Did each of those previous occasions -- you have already 8 told us that the MASTS can involve strikes on vehicles 9 or a premises. 10 A. Yes. 11 Q. Did each of those previous occasions you have told us 12 about involve strikes on cars or did some of them 13 involve the alternative scenario you have set out? 14 A. Yes, some would be vehicles. We would then deploy to 15 a building or we could deploy on foot. 16 Q. Were you qualified to use special munitions? 17 A. Yes, I was. 18 Q. Can you assist as to your understanding of what 19 documents regulated the conduct of the MASTS operation? 20 A. It would be GMP's own standard operating procedures, 21 also governed by the firearms manual of guidance. 22 Q. Thank you. Can I ask you then, by March 2012 did you 23 consider yourself to be occupationally and operationally 24 competent as an SFO participating in a MASTS operation? 25 A. Yes, I would.</p> <p style="text-align: center;">Page 4</p>

1 (Pages 1 to 4)

1 Q. N7, having dealt with your background and your
 2 experience, I want to move now please to your knowledge
 3 of the nominals involved in Operation Shire as
 4 of March 2012.
 5 We can see from your witness index that you had been
 6 deployed as part of the Shire deployments on a number of
 7 occasions starting in December 2011 through to the
 8 deployments in February and March.
 9 **A. Yes.**
 10 Q. Can I ask you, prior to your involvement in the Shire
 11 deployments, had you any previous knowledge of
 12 Mr Grainger?
 13 **A. No.**
 14 Q. Any previous knowledge of Mr Rimmer?
 15 **A. No.**
 16 Q. And, finally, any previous knowledge of David Totton?
 17 **A. No.**
 18 Q. In terms of then the knowledge that you acquired from
 19 involvement with Operation Shire, it is solely your
 20 knowledge of the three that comes from the information
 21 you were provided during the period of Operation Shire?
 22 **A. That's correct.**
 23 Q. Can I ask then additionally, we know that as of
 24 3 March 2012 that the Corkovic nominals were not part of
 25 the briefing that was delivered to firearm officers, but

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1 it is also right that in the earlier days of
 2 Operation Shire, certainly in the December time, that
 3 the Corkovics featured heavily. Do you recall that?
 4 **A. I don't recall that, no.**
 5 Q. Can I ask, in terms of when you are an SFO that has been
 6 deployed on a long-running operation where essentially
 7 the nominals have changed, are you able to put out of
 8 your mind previously-acquired information that has been
 9 briefed up on earlier briefings. The example here being
 10 in respect of the Corkovics?
 11 **A. Yes, I think -- yes, I think you can. Because it is --**
 12 **information intelligence changes regarding subjects on**
 13 **a daily basis, so you go with basically what you have**
 14 **got on the briefing on that day.**
 15 Q. I think we can see that you were deployed on the two
 16 quick succession deployments on 2 March 2012 and
 17 3 March 2012.
 18 **A. That's correct.**
 19 Q. I want to please deal with what you recall from the
 20 3 March deployment, please. I am going to take you,
 21 please, to your witness statement behind tab 1. I want
 22 to ask you, please, in terms of how your involvement
 23 commences on 3 March, you set out that you paraded on at
 24 work at 4.30 in the morning?
 25 **A. That's correct.**

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1 Q. Then we see, a little later on in the witness statement,
 2 other timings such as the 18.15 timing for when you
 3 prepared to move the vehicle in company with other
 4 firearms officers and then there are the other times
 5 that appear in your witness statement relating to State
 6 Amber and State Red. Could I just ask you to be shown
 7 a copy of a flip chart, please.
 8 **A. Yes.**
 9 **Yes, I've got that.**
 10 Q. N7, the Inquiry has heard evidence that the flip chart
 11 was used when the various firearms officers were
 12 together at Nexus House on 9 March 2012 for the purposes
 13 of creating their witness statements. Do you recall the
 14 flip chart being used on that occasion?
 15 **A. Yes, I do.**
 16 Q. Can I ask then, when we see the various times within
 17 your witness statement, were they obtained from the
 18 timings that were set out on the flip chart?
 19 **A. Yes, that's correct, yes.**
 20 Q. Can I ask, in terms of you then relying on the times
 21 that were provided on the flip chart, can you assist as
 22 to why you used those timings?
 23 **A. Just to help me write my statements, generally to be**
 24 **more accurate.**
 25 Q. Why did you believe the timings on the flip chart to be

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1 more accurate?
 2 **A. They were provided to us by supervision, who may have**
 3 **had access to sort of documentation relating to times**
 4 **about the day.**
 5 Q. You have told us that the times were provided by
 6 supervision, can you assist as to who within supervision
 7 provided those times, do you have a name?
 8 **A. I think it was J4.**
 9 Q. When you refer to "supervision" then, is it just J4 you
 10 are referring to? There is no other individual?
 11 **A. No, J4.**
 12 Q. Can I ask then, without revealing where you live, in
 13 terms of commencing a tour of duty at 4.30 in the
 14 morning, what time would you have needed to be awake
 15 from to essentially wake up and be at Openshaw for 4.30
 16 in the morning for a brief?
 17 **A. Around 3.30/3.45.**
 18 Q. Can I ask then, when you are essentially called in to
 19 commence a tour of duty on an operation, do you have any
 20 appreciation at that time as to when your tour of duty
 21 would come to an end?
 22 **A. Not necessarily, no.**
 23 Q. On 3 March, had you any indication when you paraded on
 24 as to when it was likely that your duty that day would
 25 come to an end?

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1 **A. No.**
 2 Q. We can see from the witness statements and from the
 3 briefing that you were the driver of the delta vehicle.
 4 **A. That's correct.**
 5 Q. The delta vehicle being a Volkswagen Transporter?
 6 **A. That's correct.**
 7 Q. I think additionally on 2 March you had also performed
 8 the role of the driver?
 9 **A. That's correct.**
 10 Q. Is there any particular reason why you were assigned on
 11 both days the role of driver of the delta vehicle?
 12 **A. No, no reason at all. Generally if it is a long-running**
 13 **operation you perform the same role just to keep**
 14 **continuity.**
 15 Q. In terms of you saying if there is a long-running
 16 operation you keep the same roles for continuity, does
 17 that apply throughout essentially the alpha, bravo
 18 charlie --
 19 **A. Not necessarily, it is just -- I just performed that**
 20 **role on both occasions.**
 21 Q. N7, there are additional bundles, the general firearms
 22 bundles, which contain a number of documents. I am
 23 going to ask you, please, to look in file 2 of the
 24 general firearms officer's bundle. If I could ask you
 25 please to turn behind tab 22, where we see the briefing

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1 given for Operation Shire on 3 March.
 2 **A. Yes, I've got that.**
 3 Q. Can I ask you, please, to turn to the internal
 4 pagination 1267.
 5 **A. Yes.**
 6 Q. We can see that part of the briefing included:
 7 "Information and intelligence that the subjects of
 8 this operation are believed to be engaged in armed
 9 robberies in the north-west region."
 10 Just pausing there for a moment, how did you
 11 interpret the briefing when it referenced "engaged in
 12 armed robberies"?
 13 **A. That the police had information that the subjects were**
 14 **involved in armed robberies, basically as it says**
 15 **really.**
 16 Q. In terms of "armed robberies", can you just be clear as
 17 to what you understood "armed robberies" to mean?
 18 **A. Robberies where they use weapons to cause the robbery.**
 19 Q. In characterising that "a robbery where weapons could be
 20 used", you are not saying it would have to be always
 21 with a firearm, it could be any weapon?
 22 **A. It could be any weapon, yes.**
 23 Q. Which could include a firearm?
 24 **A. It could, yes.**
 25 Q. Can I ask you then, staying on the same page, we can see

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1 that intelligence was provided as part of the briefing
 2 to suggest that these subjects were responsible for
 3 a robbery in 2008 in Preston where they broke into
 4 a bank and lay in wait for the staff to arrive:
 5 "... on their arrival they were held at gunpoint,
 6 shotgun and handgun. Tied up and forced to hand over
 7 keys to the strong room. The subjects made good their
 8 escape with a substantial amount of money."
 9 Can I ask in terms of this piece of intelligence and
 10 reference to "the subjects", did you interpret that
 11 intelligence to relate to all three of the nominals that
 12 were briefed up on 3 March?
 13 **A. Yes, I would.**
 14 Q. Just to be clear, you understood that on the briefing to
 15 relate to David Totton, Anthony Grainger and
 16 Robert Rimmer?
 17 **A. Yes.**
 18 Q. Could I ask you then, please, to move to the threat
 19 assessment for David Totton over the page at 1268.
 20 **A. Yes, I've got that.**
 21 Q. Again, in terms of we will see that for each of the
 22 nominals the intent is referenced "Conspiracy to commit
 23 armed robbery". In terms of the question I asked you
 24 a moment ago as to your understanding of what an armed
 25 robbery is, the same answer applies?

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1 **A. Yes, that would be the same answer.**
 2 Q. We can see as part of the threat assessment under
 3 "Capability" the briefing addressed the warnings that
 4 applied for David Totton on this page, over the page for
 5 Mr Rimmer and then finally, at 1270, for
 6 Anthony Grainger.
 7 **A. Yes.**
 8 Q. Can you assist as to your understanding of warning
 9 markers?
 10 **A. Yes, warning markers can either be intelligence that is**
 11 **obtained from police systems where it is either**
 12 **a conviction or it is information that has come into the**
 13 **police that has been stored on our systems that was**
 14 **given a warning marker against that.**
 15 Q. In terms of then the accuracy of those warnings on
 16 a briefing, would you take that to be reliable and
 17 accurate information that is being briefed in respect of
 18 warnings?
 19 **A. Yes, I would.**
 20 Q. N7, we can see within both the PowerPoint presentation
 21 that was given but also the transcript for 3 March, can
 22 I just ask rather than going through the whole
 23 transcript with you, have you had an opportunity before
 24 today to re-review the transcript of the briefing that
 25 was given on 3 March?

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1 **A. Briefly, yes.**
 2 Q. I think you will be aware that in the briefing that was
 3 given on 3 March there was no assessment given by
 4 Mr Granby or X7 as to whether the subjects would be
 5 carrying firearms or not.
 6 **A. That's correct.**
 7 Q. Would you ordinarily expect as part of a briefing for
 8 that information to be shared with the AFOs?
 9 **A. Yes, I would expect that information to be shared.**
 10 THE CHAIRMAN: So that I understand correctly, obviously you
 11 would expect to be told if there was intelligence to
 12 suggest that the subjects would be carrying firearms,
 13 but you are saying, are you, that if there was no
 14 information, you would still expect to be told that?
 15 **A. Yes, sir.**
 16 THE CHAIRMAN: Yes.
 17 MS CARTWRIGHT: Just for clarification, N7, if nothing was
 18 said about subjects having firearms, how would you treat
 19 that?
 20 **A. Treat it generally as general information that they**
 21 **would have -- we would have been told about weapons, I'd**
 22 **just treat it as general information, there is no**
 23 **specific in relation to weaponry.**
 24 Q. If nothing was said about the subjects having a firearm,
 25 you would take it that there is nothing specific about

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1 the subjects having weaponry?
 2 **A. That's correct.**
 3 Q. Including firearms?
 4 **A. Including firearms.**
 5 Q. We can see from the briefing and from the various
 6 statements as well that within the delta vehicle that
 7 day was G1?
 8 **A. Yes, G1.**
 9 Q. I think G1 was sat in the position next to you in the
 10 delta vehicle?
 11 **A. That's correct.**
 12 Q. Then V3, who was sat in the position essentially behind
 13 your driver's seat?
 14 **A. That's correct.**
 15 Q. Then V8 sat behind G1?
 16 **A. That's correct, yes.**
 17 Q. Can I ask in terms of we know that after the briefing
 18 concluded, that it commenced around about 6.00 in the
 19 morning, that the briefing having been given, that
 20 I think then you were essentially left Openshaw and
 21 deployed immediately to Leigh police station.
 22 **A. Yes.**
 23 Q. Can I ask, in terms of the ordinary course of events or
 24 the ordinary practice, is it not general good practice
 25 for the teams that are deployed that day to essentially

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1 rehearse or practice what the tactic is going to be that
 2 day?
 3 **A. If we had time, yes, we would practise.**
 4 Q. On 3 March, was there not time to practise before moving
 5 on to Leigh police station?
 6 **A. From recollection, I think we were told to go straight**
 7 **to Leigh police station.**
 8 Q. Do you know who told you to go straight to Leigh police
 9 station?
 10 **A. I can't recall who it was.**
 11 Q. Can I ask, in terms of then that being your
 12 recollection, was there any sense of urgency as the
 13 delta vehicle moved from Openshaw to Leigh police
 14 station?
 15 **A. From recollection, we just moved with the other three**
 16 **vehicles.**
 17 Q. I think thereafter, once you arrived at Leigh police
 18 station -- can you just assist as to roughly what time
 19 you recall arriving at Leigh police station?
 20 **A. I think it takes approximately about an hour or so to**
 21 **get to Leigh police station.**
 22 Q. I think we know that having then been deployed to Leigh
 23 police station, you were essentially relaxing or there
 24 was no requirement for you to do anything once you got
 25 there?

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1 **A. No, just park up and, yes.**
 2 Q. Can I ask then, in terms of looking at your witness
 3 statement, please --
 4 THE CHAIRMAN: Do you mean the first one?
 5 MS CARTWRIGHT: Yes, behind tab 1, page 186. You tell us in
 6 your witness statement that you parked the vehicle and
 7 throughout the day you stayed in the refreshments room,
 8 and were able to relax and eat.
 9 **A. That's correct, yes.**
 10 Q. I think there is some information that other members of
 11 the delta team stayed in the vehicle, do you recall
 12 that?
 13 **A. I don't recall that, no.**
 14 Q. But you located yourself in the refreshment room?
 15 **A. Yes, one of us would stay with the vehicle at all times.**
 16 Q. Can you assist as to then what you did prior to the next
 17 time you had given us in your witness statement up to
 18 6.15 in the early evening?
 19 **A. Throughout the day I'd have just --**
 20 THE CHAIRMAN: Just in general terms, we don't need detail.
 21 **A. Just relax and stay refreshed.**
 22 THE CHAIRMAN: Yes.
 23 MS CARTWRIGHT: Can I ask then in terms of having
 24 essentially paraded on at 4.30 in the morning,
 25 particularly when you get to around about the 4.00 in

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<p>1 the afternoon mark, where you have been on duty then for 2 some 12 hours, was there any talk about what was 3 happening or how long the tour of duty was likely to be 4 that day. 5 A. I don't recall any conversations. 6 Q. Can we then deal with, please, the movement at 6.15 7 which is the time you have given us in your witness 8 statement behind tab 1. Again in terms of that time, do 9 you have any direct recollection of that time or is it 10 solely taken from the information that was set out on 11 the flip chart? 12 A. I would have taken that time from the flip chart. 13 Q. Can you assist as to what you were told before you made 14 your way from Leigh police station? 15 A. I don't recall what I was being told. 16 Q. In terms of the movement, was that all four vehicles 17 that then left Leigh police station together? 18 A. From recollection, yes. 19 Q. The statement tells us that that was at the direction of 20 the OFC, X7? 21 A. That's correct. 22 Q. Again in terms of any update as to what was happening or 23 likely to happen, can you recall what was said at that 24 time? 25 A. I don't recall anything being said at the time we moved</p> <p style="text-align: center;">Page 17</p>	<p>1 Q. Again, can you recall as to who identified the Raven Inn 2 car park as the lay up place? 3 A. I can't be sure but the OFC, X7, will have identified 4 that. 5 Q. Do you recall that on 2 March -- I think you were 6 involved in that deployment also -- that when Mr Lawler 7 was the TFC there was reference to the plan being to 8 intercept the vehicle before it reached Culcheth. Do 9 you recall that? 10 A. I don't recall that, no. 11 Q. Can you recall whether there was any discussion on 12 3 March about intercepting the red Audi? 13 A. Honestly, I don't recall that. 14 Q. Can I ask, can you recall then as part of the briefing 15 what the role and the plan was for the delta vehicle as 16 part of the deployment that day? 17 A. Yes. The delta vehicle was a support vehicle, acting in 18 support of the alpha, bravo and charlie vehicle. 19 Q. In terms of then being directed as to what -- being 20 a support vehicle, what was required then of the various 21 members of the delta vehicle, can you recall with any 22 detail as to whether there was a discussion about that? 23 A. No, there was no discussion. 24 Q. Can you assist then as to what you understand being the 25 support vehicle or to give support to alpha, bravo and</p> <p style="text-align: center;">Page 19</p>
<p>1 off, no. 2 Q. Can I ask, in terms of the briefing and the PowerPoint, 3 we can see that the focus of that briefing and the 4 PowerPoint was the Culcheth area? 5 A. Yes, that's correct. 6 Q. Can I ask, prior to 3 March, had you actually deployed 7 and been to Culcheth? 8 A. No, I hadn't. 9 Q. Again, in terms of as part of the briefing, we can see 10 there was reference to where the vehicle had previously 11 been seen to be parked on the car park near to the 12 Sainsbury's, can you recall that? 13 A. I don't recall that, no. 14 Q. You tell us in the witness statement that you drove to 15 a lay up point at the Raven Inn public house car park 16 near to the junction with Hey Shot Lane? 17 A. Yes, that's correct. 18 Q. Again, if you could look at the flip chart, please, did 19 the details of the lay up point come again from the flip 20 chart here? 21 A. Yes, it did. 22 Q. Because I think in fact it is "Hey Shoot Lane", rather 23 than "Hey Shot Lane", so you essentially relied upon the 24 flip chart for that information? 25 A. Yes, I will have done, yes.</p> <p style="text-align: center;">Page 18</p>	<p>1 charlie means in practice? 2 A. Yes, it could be -- an example would be the subjects are 3 out on foot and it is not practical to deploy officers 4 from the alpha, bravo and charlie vehicle, so we would 5 do that, we would perform that role. 6 Q. Yes, so as a foot intercept? 7 A. Foot intercept or a containment team. 8 Q. Yes. 9 A. If we were looking at a building we would provide 10 an outer containment, initial outer containment. 11 Q. I think we can see that within the PowerPoint so perhaps 12 if we perhaps just turn behind tab 22, please, in the 13 general firearms bundle. 14 THE CHAIRMAN: I think I have seen that document, 15 Ms Cartwright and the officer has confirmed it. 16 MS CARTWRIGHT: Thank you, sir. 17 It is page 1282, N7. 18 Sir, there is a plan I think in respect of a foot 19 interception. 20 A. Yes, that's correct, I've got it. 21 Q. Can I ask then, in terms of this document that obviously 22 gives an aerial view of Culcheth, various locations and 23 the roads, did you print off a copy of this briefing or 24 was it in the delta vehicle that day to assist with 25 identifying where you were being deployed to?</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

1 **A. I personally didn't print a copy off, but we may well**
2 **have had a copy of this in our vehicle to assist us.**
3 Q. Can I ask, when you are the driver being deployed to
4 an area -- you have told us that you had never been to
5 Culcheth that day -- do you conduct research as to the
6 roads and where various things are so even before
7 getting there you know where you are likely to need to
8 go and the road layout?
9 **A. Yes, we would use A to Zs, any sort of mapping system we**
10 **have, yes.**
11 Q. I am asking you about that, N7, because it appears from
12 the various witness evidence that there was then some
13 confusion once you did deploy into Culcheth as to where
14 in fact the delta vehicle was going. Would you agree
15 with that?
16 **A. That's correct, yes.**
17 Q. Back in your witness statement, please, N7. You set out
18 that you remained in the car park at the Raven Inn
19 public house for no more than five minutes, when you
20 were directed by X7 over the radio to make your way
21 towards Common Lane/Jackson Avenue area of Culcheth and
22 find a suitable lay up point.
23 **A. Yes, that's correct.**
24 Q. Again, are you clear that you were being told to go to
25 Common Lane/Jackson Avenue?

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1 **A. Yes.**
2 Q. Your statement tells us that you were told that that was
3 in order for the delta vehicle to react to any subjects
4 that were out on foot, if possible arrest was to be
5 authorised?
6 **A. That's correct, yes.**
7 Q. You then tell us that you made your way to the Culcheth
8 area. I think at this stage it is just the delta
9 vehicle that makes its way originally, isn't it?
10 **A. That's correct, yes, it is.**
11 Q. Because it is right, isn't it, the delta vehicle is made
12 to look almost like a taxi, a covert taxi?
13 **A. Yes, you could say that, yes.**
14 Q. Can you assist then, having been directed by the OFC to
15 make your way towards Common Lane/Jackson Avenue, why
16 you chose to park on Church Lane?
17 **A. From recollection, it would have been the most suitable**
18 **place to park our vehicle.**
19 Q. Why do you say that?
20 **A. Taking into consideration the other road users, the**
21 **environment, the car parking spaces available to us.**
22 Q. Did you make directly to Church Lane or did you drive
23 round the area before laying up at Church Lane?
24 **A. I do recall driving round the area for a few minutes**
25 **finding a suitable location.**

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1 Q. Can I ask you, please, we have a street plan of
2 Culcheth, which is in the O1 bundle at page 300A.
3 **A. Sorry, what was the page number, please?**
4 Q. It is page 300 and it has an "A" added in as well.
5 **A. Yes.**
6 Q. We can see just off -- if you see the red road that
7 almost dissects down to the bottom?
8 **A. Yes.**
9 Q. Then just off that you will see Church Lane, do you see
10 that?
11 **A. I do see that, yes.**
12 Q. Then running off in the opposite direction, the yellow
13 road, Common Lane, and you can see, almost opposite the
14 green park area of Common Lane, there is Jackson Avenue
15 that runs off to the left?
16 **A. Yes, I do.**
17 Q. Can I ask then, in terms of locating yourself on
18 Church Lane, it is putting the vehicle, the delta
19 vehicle some distance away from the
20 Jackson Avenue/Common Lane area, isn't it?
21 **A. Yes.**
22 Q. Again, can I ask, in terms of the car park and it being
23 known by the operation team that the nominals had
24 previously laid up at the car park off Jackson Avenue,
25 can you assist as to you didn't make your way to there

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1 or to Jackson Avenue?
2 **A. Because we were told to make our way to the Common Lane**
3 **area, Jackson Avenue. That is where we were told,**
4 **directed to. Whether the OFC has information that we**
5 **are not aware of, and just asked us to make our way**
6 **there, I don't know.**
7 Q. I am just trying to follow then, having been given that
8 direction, why you choose to park upon a different road?
9 **A. Because there may not have been anywhere to park on**
10 **Common Lane/Jackson Avenue.**
11 Q. I think you know -- I think there are a lot of car parks
12 around that area, aren't there, so not just the
13 Jackson Avenue one?
14 **A. There is a lot of car parks, yes.**
15 Q. Can you assist as to why you didn't choose to locate
16 yourself on one of those?
17 **A. I can't answer that.**
18 THE CHAIRMAN: Okay.
19 MS CARTWRIGHT: Thank you.
20 Because I think it is right that having positioned
21 yourself on Church Lane, there was then a difficulty in
22 terms of you then following the convoy of the alpha,
23 bravo and charlie vehicle as it made its way to
24 Jackson Avenue?
25 **A. That's correct.**

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1 Q. Just dealing with that, please, your statement tells us
 2 at 7.05, you heard via the police radio from X7 that
 3 firearms officers were deploying on at that car park off
 4 Common Lane in order to detain three subjects in a red
 5 Audi.
 6 **A. Yes.**
 7 Q. Pausing there, are you clear that it was said over the
 8 radio at that time that it was to detain three subjects?
 9 **A. It is in my statement, so that is what I can recall.**
 10 Q. Can I ask, in terms of you obviously knew from the
 11 events on the car park that there were three subjects,
 12 but I just want to be clear as to whether or not at
 13 7.05, it was said that they were to detain three
 14 subjects?
 15 **A. I can only say if I have wrote it in my statement that**
 16 **that is what I would have assumed five years ago when**
 17 **I was writing it.**
 18 Q. Can you recall anything else that was being said over
 19 the radio at that time from either the OFC, the TFC or
 20 any information that was being relayed from the
 21 surveillance officers?
 22 **A. I don't, to be honest.**
 23 Q. We can see that you describe in the witness statement
 24 being unable to join the convoy due to other vehicles,
 25 I think meaning that you could not join the end of the

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1 convoy?
 2 **A. Yes, that's correct.**
 3 Q. Would the plan have been that you should have been
 4 directly behind the charlie vehicle?
 5 **A. If we could have done, yes, we will have done, yes.**
 6 Q. Again, when you saw the alpha, bravo and charlie
 7 vehicle, were you clear as to where they were heading,
 8 from what was being said over the radio?
 9 **A. I wasn't to be honest.**
 10 Q. Why was that?
 11 **A. Because we were told to make our way -- it was a car**
 12 **park off Common Lane, and in the distance we could see**
 13 **a car park, so we just assumed that that was the car**
 14 **park they were heading to.**
 15 Q. Can I please just take you to the photographs, just so
 16 we can see if we can identify where the delta vehicle
 17 went, please.
 18 **A. Yes.**
 19 Q. Again, it is in bundle O1 but it is the bundle that
 20 starts at page 272 -- so it is the same bundle, I do
 21 apologise.
 22 **A. Yes.**
 23 **Could you please give me the page --**
 24 Q. I am just trying to find the best photograph, please,
 25 thank you.

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1 Perhaps if you could turn, please, to page 304.
 2 **A. Yes, I've got that.**
 3 Q. I think we can see, so the road again that runs down is
 4 Common Lane?
 5 **A. Yes, that's correct.**
 6 Q. I think we can then see Jackson Avenue that runs to the
 7 car park, can you see that?
 8 **A. I can, yes.**
 9 Q. Can you recall, did you go essentially past the turning
 10 for Jackson Avenue, continuing along Common Lane and
 11 then turn to the right on what I think we know is
 12 Lodge Avenue?
 13 **A. I stopped my police vehicle just after the junction with**
 14 **Jackson Avenue. Essentially where that last police car**
 15 **is, just parked on the pavement.**
 16 Q. Can I ask, in terms of stopping there, do you recall why
 17 you stopped there?
 18 **A. Yes, so we could get a look into the car park which was**
 19 **to my offside, which is slightly off the picture.**
 20 Q. Yes. Perhaps if we go to another photograph, page 334.
 21 THE CHAIRMAN: Sorry?
 22 MS CARTWRIGHT: 334.
 23 I think we can see the gap between the buildings
 24 that would give a view into the car park. Was that the
 25 view where you had been looking --

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1 THE CHAIRMAN: I am not sure that is -- I may not have the
 2 right page, 334?
 3 MS CARTWRIGHT: Yes.
 4 **A. There is a gap between the buildings.**
 5 THE CHAIRMAN: What does it look like, Ms Cartwright?
 6 MS CARTWRIGHT: N7, is this the photograph that you have?
 7 **A. Yes, I have.**
 8 Q. Was it this gap?
 9 **A. I don't recall seeing that gap between the buildings,**
 10 **no.**
 11 Q. Okay.
 12 THE CHAIRMAN: If we go back to 304, you were talking about
 13 a car park that was on your offside, off the photograph.
 14 MS CARTWRIGHT: I do apologise, I am misleading the witness
 15 here.
 16 THE CHAIRMAN: It's alright. I think he is talking about
 17 a different car park.
 18 MS CARTWRIGHT: He is. I am --
 19 THE CHAIRMAN: Perhaps you would like to look through, N7,
 20 and see if you can see a photograph that shows --
 21 **A. I have looked through the bundle previous to this and it**
 22 **is just off slightly the -- you can actually see the**
 23 **corner of the playground.**
 24 MS CARTWRIGHT: I think actually 317 illustrates the car
 25 park.

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1 Thank you, Ms Hadfield-Grainger.
 2 Can we see then to the right of the photograph the
 3 other car park then which is off Lodge Avenue?
 4 **A. No, that is a further car park. If -- off Common Lane,**
 5 **if you drive past, or you were to drive past**
 6 **Jackson Avenue, there is a car park just slightly**
 7 **further up the road on the right-hand side, it is**
 8 **a playground and there were vehicles parked there. That**
 9 **is what we thought the alpha, bravo and charlie vehicle**
 10 **were being deployed to.**
 11 Q. Can you just see on 317 because in fact next to that car
 12 park, in front of it, is the green area I think that is
 13 the park, so if you perhaps look at 318.
 14 **A. Ah yes. Yes. Got that.**
 15 Q. Yes. Does that assist, was that then the car park that
 16 you thought you were heading to?
 17 **A. Yes, that's correct, that helps.**
 18 THE CHAIRMAN: Can you point that out to me?
 19 MS CARTWRIGHT: It is when you looked to your offside, it
 20 was looking to this car park over here.
 21 **A. That's correct.**
 22 Q. Is that where you thought the alpha, charlie and bravo
 23 vehicle had gone?
 24 **A. That's correct.**
 25 Q. Can you assist as to why you thought they had headed

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1 towards that car park?
 2 **A. Yes, as we were driving up Common Lane, due to the heavy**
 3 **traffic, we suddenly lost sight of alpha, bravo and**
 4 **charlie. And with that short distance, looking ahead of**
 5 **us, we could only see that car park and we assumed it**
 6 **was that car park that they had deployed to.**
 7 THE CHAIRMAN: Right. Okay.
 8 MS CARTWRIGHT: Your statement tells us that you heard over
 9 the radio that officers were deploying on to the red
 10 Audi and it was at that point you became stationary in
 11 the junction in order to locate the firearms team and at
 12 which point your three colleagues alighted the vehicle
 13 and began to, "Cross the road to my offside".
 14 **A. Yes.**
 15 Q. In terms of you describing being stationary in the
 16 junction, can you assist using photograph 318 as to
 17 where the junction is that you were stationary in?
 18 **A. Yes, the junction of Common Lane and Jackson Avenue,**
 19 **I would say approximately where that silver car is, just**
 20 **a few feet back from that.**
 21 Q. From the telephone box?
 22 **A. Yes.**
 23 THE CHAIRMAN: Sorry, can you point?
 24 MS CARTWRIGHT: Are you indicating here, N7? (Indicates)
 25 **A. Yes, we had just got past the junction of**

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1 **Jackson Avenue.**
 2 **Yes.**
 3 THE CHAIRMAN: Okay.
 4 Q. You have described how essentially the three other
 5 occupants of the delta vehicle got out.
 6 **A. Yes.**
 7 Q. I think it is right, isn't it, that they deployed in the
 8 direction of the car park that you have identified where
 9 you thought alpha, bravo and charlie had gone?
 10 **A. That's correct, yes.**
 11 Q. Can you assist, when they left the delta vehicle, what
 12 G1, Mr Higgins and V3 were wearing?
 13 **A. I can't recall that.**
 14 Q. Do you recall whether they had respirators on?
 15 **A. Some of them may; I do recall picking a respirator up**
 16 **from the road.**
 17 Q. In terms of picking up a respirator from the road, can
 18 you help us as to where that respirator was proximate to
 19 your vehicle?
 20 **A. Where I have remained stationary.**
 21 Q. Do you know whose respirator that was?
 22 **A. I don't.**
 23 Q. Would it be a fair summary of what you are describing
 24 that there is quite a degree of panic at this time? If
 25 that is not a summary --

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1 **A. I wouldn't say panic, it is just an understanding of the**
 2 **location we are in as to where my colleagues had gone**
 3 **to.**
 4 Q. In terms of that respirator, that should have been being
 5 worn by whoever didn't have a respirator on. Is that
 6 correct?
 7 **A. I can't answer that.**
 8 Q. Can I ask, before then moving to deal with what you
 9 heard by way of gunshots and the like, do you recall
 10 a period of time shortly before this where it had been
 11 communicated that there had been a loss of sight of the
 12 subjects?
 13 **A. Yes, I do recall that.**
 14 Q. Can you assist as to when you recollect the loss of
 15 sight was reported?
 16 **A. I can't recall the time it was, but I do remember that**
 17 **being communicated over the radio.**
 18 Q. Do you recall whether you were at the Raven Inn at that
 19 time or whether it was at a time when you were on
 20 Church Lane?
 21 **A. I honestly can't recall.**
 22 Q. Do you recall what was being said in respect of the fact
 23 that there had been a loss of sight of the subjects?
 24 **A. No, only that I do recall it coming over the radio that**
 25 **they had lost sight of the subjects.**

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1 Q. In terms of it being communicated that there was a loss
 2 of sight, what goes through your mind when you hear that
 3 there is a loss of sight of the subjects?
 4 **A. That the surveillance team are attempting to gain**
 5 **control of the subjects again.**
 6 Q. Do you recall for what period there was the loss of
 7 sight?
 8 **A. I can't recall the length of time, no.**
 9 Q. If I could take you back then to the time where the
 10 three occupants of your delta vehicle have deployed out
 11 and across towards the car park to the right-hand side?
 12 **A. Yes.**
 13 Q. Can you tell the Inquiry what then happened and what you
 14 then heard, please?
 15 **A. Yes, my colleagues alighted and began to cross in front**
 16 **of me. The doors were open of the vehicle, I then heard**
 17 **a gunshot, what sounded like a gunshot, and it was at**
 18 **that point I noticed my colleagues turn around and run**
 19 **back to my nearside, back towards the junction we had**
 20 **just passed.**
 21 Q. Having heard the gunshot, what did you do?
 22 **A. I had to turn my vehicle round, so I alighted from my**
 23 **driver's door to get out, close all the other doors and**
 24 **pick up several items from the road that had been**
 25 **dropped while my colleagues alighted.**

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1 Q. In terms of the several items, you have told us about
 2 the respirator, can you recall what else had been
 3 dropped in the road?
 4 **A. I can't, to be honest.**
 5 Q. Did you see where your colleagues had run to?
 6 **A. I didn't see where they had run to but I just know it**
 7 **was to my nearside.**
 8 Q. Having shut the doors on the delta vehicle, what did you
 9 then do, please?
 10 **A. I manoeuvred my vehicle within the road --**
 11 THE CHAIRMAN: Do you mean to your offside, your colleagues
 12 went to your offside?
 13 **A. Ran from -- initially they ran to my offside to run to**
 14 **the car park that we thought --**
 15 THE CHAIRMAN: You are talking about when they came back?
 16 **A. When they came back they ran up towards Jackson Avenue.**
 17 THE CHAIRMAN: I follow.
 18 **A. I then got out, closed the doors, turned my vehicle**
 19 **round and drove up Jackson Avenue.**
 20 MS CARTWRIGHT: Can I ask, there is some footage that has
 21 been kindly brought to court by the IPCC today. I am
 22 not intending, sir, to play that, it is available if you
 23 wish to view it, but the footage appears to show the
 24 delta vehicle at 7.09 almost turning round in this
 25 junction here that we can see on page 318 --

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1 **A. Yes. Yes.**
 2 Q. -- and then turning round to then pull back towards
 3 Jackson Avenue, in the direction of Jackson Avenue?
 4 **A. Yes.**
 5 Q. Would that fit with where you did your manoeuvre to turn
 6 the vehicle round?
 7 **A. It could well have been, yes.**
 8 Q. Perhaps then using the plan again -- perhaps using the
 9 photos is probably better. On the same photo, having
 10 turned the vehicle round, what did you then do, please?
 11 **A. I turned around and then I will have turned right up**
 12 **Jackson Avenue and I saw my colleagues' vehicles parked**
 13 **within that car park, as it is shown there.**
 14 Q. Yes.
 15 **A. And I drove towards the height barriers. I stopped at**
 16 **the height barriers due to the van I was in, just to**
 17 **check that I could get through.**
 18 Q. Could the delta vehicle get through the height barriers?
 19 **A. I just remember getting out at that point.**
 20 Q. Okay. So again, using photograph 318, where we see the
 21 height barriers, can you assist as to where then you
 22 parked the delta vehicle?
 23 **A. Yes, I recall just driving straight into the car park**
 24 **and then slightly to the left.**
 25 Q. In terms of on the photograph, there appears to be

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1 a Volkswagen vehicle on the car park, is that the delta
 2 vehicle?
 3 **A. That is, yes.**
 4 Q. Were you able to --
 5 THE CHAIRMAN: Where is that, sorry?
 6 MS CARTWRIGHT: Sir, if we look seven spaces back, slightly
 7 parked, not straight in the -- that is the vehicle.
 8 **A. That is the vehicle.**
 9 THE CHAIRMAN: Right.
 10 You did drive on to --
 11 **A. I did eventually drive on to, yes.**
 12 MS CARTWRIGHT: In terms of driving on eventually, did you
 13 drive on at this stage or did you park the vehicle the
 14 other side of the barrier initially?
 15 **A. I got out to check the height barriers and then I think**
 16 **I had some communication with another officer. Then got**
 17 **back in the vehicle and just drove it slightly on, but**
 18 **I didn't remain where it is now. It was just slightly**
 19 **back into virtually one of the parking spaces.**
 20 Q. Okay.
 21 In terms of then the sequence of events, you get out
 22 of the delta vehicle to check that the vehicle can fit
 23 under the height?
 24 **A. Yes.**
 25 Q. Then you have some discussion, did you say with

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1 an officer?
 2 **A. Yes.**
 3 Q. Who was that?
 4 **A. That would be U2.**
 5 Q. What discussion did you have with U2?
 6 **A. He informed me that one of the subjects had been shot**
 7 **and that first aid was being administered.**
 8 Q. In terms of when you did the reversing manoeuvre to then
 9 start to move to Jackson Avenue, can you assist us as to
 10 how long it took you to travel to the junction, to
 11 parking on Jackson Avenue and having the conversation
 12 with U2 where he is telling you that the subjects have
 13 been shot?
 14 **A. Moments. I can't give an exact time but it was only**
 15 **moments.**
 16 Q. Having been told by U2 that a subject had been shot,
 17 what did you do?
 18 **A. I returned to my vehicle and I used the radio that we**
 19 **had and I communicated that to the TFC.**
 20 Q. To Mr Granby?
 21 **A. Yes, that's correct.**
 22 Q. Do you recall what you said to Mr Granby?
 23 **A. I just remember repeating the words that U2 had told me.**
 24 Q. Can I please just take you at this stage to your witness
 25 statement behind tab 2, please.

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1 **A. Yes.**
 2 Q. I think in the second witness statement of May 2012 you
 3 give additional detail as to what you saw when you drove
 4 the vehicle to the entrance of the car park. You set
 5 out that:
 6 "In front of me I could see officers knelt down next
 7 to the passenger side of a red Audi vehicle, which was
 8 situated in the far right corner of to the entrance of
 9 the car park, with further officers stood to the rear of
 10 this vehicle. This was at a distance of approximately
 11 30 metres away from my position."
 12 **A. That's correct.**
 13 Q. You go on:
 14 "The area had ambient lighting from the flats behind
 15 the red Audi vehicle in the front and from street
 16 lighting around the car park. I was also aware of the
 17 headlights on the MASTS vehicle lighting up the area
 18 around the vehicle where officers were knelt down next
 19 to."
 20 **A. That's correct.**
 21 Q. Can I ask, were you specifically asked to address
 22 lighting in this additional witness statement?
 23 **A. Yes, I was.**
 24 Q. In terms of in May 2012, did you have any recollection,
 25 a better recollection of the lighting then?

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1 **A. I would say, yes. Yes, I would.**
 2 Q. Can you assist as to why you didn't put that in your
 3 initial account, the 9 March account?
 4 **A. I can't account for that, sorry.**
 5 Q. I think you confirm in your other witness statements
 6 that you are certain there was no collision with the
 7 delta vehicle?
 8 **A. That's correct.**
 9 Q. Similarly I think you have indicated as well that you
 10 were not wearing any police identifiable markings at
 11 that time?
 12 **A. No.**
 13 Q. Did you have available within the delta vehicle items of
 14 clothing that would identify you as a police officer?
 15 **A. Yes, I did.**
 16 Q. Can you assist as to what you did have access to?
 17 **A. I had a police baseball cap that has a checkered band**
 18 **round the top with "Police" wrote on and I also have**
 19 **a police strike jacket.**
 20 Q. You have described how you heard one gunshot prior to
 21 then turning the vehicle round. Did you just hear one
 22 gunshot?
 23 **A. Yes, I did.**
 24 Q. Having made the call to Mr Granby to inform him that
 25 there had been a shot fired, can you assist as to any

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1 other conversation you had at the scene, please?
 2 **A. Not over the radio, no.**
 3 Q. Did there come a time when you had had a conversation
 4 with G1?
 5 **A. Yes. Yes, I did.**
 6 Q. Can you tell us about that, please?
 7 **A. Yes, I was informed by G1 that the principal officer was**
 8 **Q9 and I was to take, walk back to my vehicle with Q9**
 9 **and remain with him in that vehicle and assist with his**
 10 **welfare.**
 11 Q. Can I ask, were the words that Q9 was the principal
 12 officer all that was said or was more detail given at
 13 that time as to Q9 and Q9 having fired the shot?
 14 **A. No, it was just that he was the principal officer.**
 15 Q. Did you then have any conversation with Q9?
 16 **A. Yes, I did have a conversation.**
 17 Q. Can you assist as to what you and Q9 discussed, please?
 18 **A. Yes, I just asked about his welfare, his general**
 19 **condition.**
 20 Q. Did you have any discussion about why he had fired?
 21 **A. No, none at all.**
 22 Q. Why was that?
 23 **A. Because there was no need to. I knew the procedure and**
 24 **Q9 knew the procedure.**
 25 Q. When you say you "knew the procedure", what procedure is

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1 that, N7?
 2 **A. The post-incident procedures in relation to conferring**
 3 **about decision making.**
 4 Q. Had anyone prior to that time reminded you on the night
 5 about the non-conferral warning?
 6 **A. No one had reminded me on the night, no.**
 7 Q. Just to be clear, at the time when you took Q9 to your
 8 vehicle, was the delta vehicle then parked on the car
 9 park --
 10 **A. It was, yes.**
 11 Q. -- not in the position we see in the photograph, but
 12 proximate to that?
 13 **A. It was, yes.**
 14 Q. You tell us in a statement that you placed Q9's weapon
 15 into a black protective weapon slip?
 16 **A. Yes, that's correct.**
 17 Q. I think there then came a time when you, Q9 and G1 made
 18 your way back I think to the office at Openshaw?
 19 **A. That's correct, yes.**
 20 Q. How did it come about that you, Q9 and G1 left the
 21 scene?
 22 **A. I was told that that is what we were going to do.**
 23 Q. Who told you that?
 24 **A. I can't recall, to be honest.**
 25 Q. Can you assist as to which vehicle you went back to

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1 Openshaw in?
 2 **A. Yes, it was -- from recollection it was a surveillance**
 3 **vehicle that we went back in.**
 4 Q. Was there just you, Q9 and G1 in the surveillance
 5 vehicle or was there any other officer?
 6 **A. There was a surveillance driver.**
 7 Q. Did you go directly back to Openshaw?
 8 **A. Yes, we did, yes.**
 9 Q. What happened when you reached Openshaw?
 10 **A. We made our way up in the inspector's office, which is**
 11 **on the first floor. We were then metted by -- metted**
 12 **and greeted by our chief inspector.**
 13 Q. What was the name of your chief inspector?
 14 **A. Chief Inspector Hughes.**
 15 Q. What was the nature of any discussion with Chief
 16 Inspector Hughes at that time?
 17 **A. He placed us in the inspector's office for a short**
 18 **period of time. It was only moments and then we were**
 19 **joined by a further chief inspector, Simpson I believe**
 20 **his name was.**
 21 Q. Were you given a non-conferral warning at that time by
 22 either Mr Simpson or Mr Hughes?
 23 **A. Mr Simpson went through the what was going to happen, he**
 24 **introduced himself as the post-incident manager,**
 25 **I recall, and went through basically the post-incident**

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1 **procedure and what we should and what we shouldn't do.**
 2 Q. Can you give a little detail as to what you were told
 3 that you should or shouldn't do at that time?
 4 **A. I can't recall specifics, but I do recall mention about**
 5 **conferring, separation.**
 6 Q. Did there come a time that night when you left Openshaw
 7 and went to Claytonbrook?
 8 **A. Yes.**
 9 Q. Can you assist as to what time that was?
 10 **A. I can't give you a time. It was, I would estimate,**
 11 **approximately 45 minutes to an hour later.**
 12 Q. Can I ask, did anyone at that time or that night ask you
 13 to make any form of first account?
 14 **A. No, they didn't, no.**
 15 Q. Was there any reason why you didn't make an account as
 16 to what had happened that evening?
 17 **A. No reason why, no.**
 18 Q. Why didn't you?
 19 **A. I can't answer that. I don't know.**
 20 Q. Can you assist, we know that there was then a delay of
 21 six days before your statement was provided. Can you
 22 assist as to why it took six days to provide your
 23 witness statement?
 24 **A. I do recall on the evening we were told to -- once the**
 25 **evening had finished, go home and command and**

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1 **supervision would be in touch as to when we come in and**
 2 **make our statements.**
 3 Q. Who was it that told you that?
 4 **A. I do believe it was J4.**
 5 Q. Did command get in touch to call you back in to make
 6 your statements?
 7 **A. Over the next few days I had several calls from Chief**
 8 **Inspector Hughes, checking on my welfare and informing**
 9 **me that they will be in touch in relation to when to**
 10 **make my statement.**
 11 Q. The Inquiry has heard evidence that there was a meeting
 12 on 8 March by the PFOA. Do you recall attending that
 13 meeting?
 14 **A. I don't recall attending that meeting at all, no.**
 15 Q. Just to see if you can assist us at all any further. We
 16 have heard evidence that V53, who was involved in the
 17 Mark Duggan shooting, was present. Does that assist at
 18 all as to whether or not you were present at the
 19 meeting?
 20 **A. I can't recall any meeting on the 8th, I am sorry.**
 21 Q. Can you assist then in terms of attending on 9 March at
 22 Nexus House to provide a statement. Can you assist as
 23 to how that came about?
 24 **A. Yes, from recollection I had a phone call -- I can't**
 25 **remember off who -- that told me to attend Nexus House**

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1 **on the 9th to make my statement.**
 2 Q. You tell us in your witness statement behind tab 1 that
 3 you made the statement at 3.00 in the afternoon on
 4 9 March. The Inquiry has some evidence and information
 5 to suggest I think that process started at 1.15 in the
 6 afternoon. Can you assist as to whether you would have
 7 started the process at about 1.15?
 8 **A. Yes, I could well have started it at 1.15.**
 9 Q. Would it be accurate to say your first statement took
 10 you somewhere in the order of 1 hour and 45 minutes to
 11 create?
 12 **A. Yes, approximately.**
 13 Q. You tell us in the statement that at the time of making
 14 your witness statement, "... you were in the company
 15 with other firearms officers and from time to time
 16 clarified matters relating to times, vehicles and
 17 location details".
 18 **A. Yes, that's correct.**
 19 Q. Can you assist us with any clarity as to what those
 20 things were, beyond the generality, that had been
 21 clarified with any other officer?
 22 **A. As put on the flip chart, really, in relation to times,**
 23 **dates, vehicle registration numbers.**
 24 Q. Can I ask, in terms of we can see that the incorrect
 25 vehicle registration number appeared in your witness

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1 statement, again was that information you took from the
 2 flip chart?
 3 **A. Yes, it will have been.**
 4 Q. Again in terms of relying on that information as part of
 5 your witness statement, did you have a recollection of
 6 any of that information that you were putting into your
 7 witness statement as fact?
 8 **A. I do believe the information on the flip chart was**
 9 **accurate and correct at that time.**
 10 Q. Why is that?
 11 **A. Because that's my belief at the time.**
 12 MS CARTWRIGHT: N7, if you wait there there will be
 13 additional questions for you.
 14 THE CHAIRMAN: Mr Thomas.
 15 MR THOMAS: Just a few questions, sir.
 16 Sir, I note the time are you quite --
 17 THE CHAIRMAN: No, we are going to finish this witness.
 18 Questions from MR THOMAS
 19 MR THOMAS: I represent Mr Grainger's family, a few
 20 questions from me. Can I start in relation to the
 21 post-incident procedure.
 22 **A. Yes.**
 23 Q. When Ms Cartwright just asked you about the conferring
 24 rule, you said that you knew that you didn't need to be
 25 reminded about that on the night, that that was

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1 something you knew, correct?
 2 **A. Yes.**
 3 Q. Do I take it from that answer you were familiar with the
 4 procedure in general?
 5 **A. I had a general understanding of the procedure, yes.**
 6 Q. Right. Can you explain then, having been familiar --
 7 how many years did you say you were a police officer?
 8 **A. Since 1997.**
 9 Q. Right, so a good few years, you were not green in the
 10 job if you understand the expression?
 11 **A. I understand.**
 12 Q. Right. Can you explain to the chairman then, having
 13 been involved in this fatality, right, was this your
 14 first police shooting fatality?
 15 **A. Yes, sir.**
 16 Q. You could see the seriousness of it?
 17 **A. Yes, sir.**
 18 Q. You knew that for want of a better expression there were
 19 some mishaps that night, and I say that not being unkind
 20 but eyes were lost on the subject car, correct?
 21 **A. That's correct, yes.**
 22 Q. You lost eyes on your colleagues?
 23 **A. Yes.**
 24 Q. In your vehicle?
 25 **A. Yes.**

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1 Q. Right. So this wasn't a smooth run operation, was it?
 2 It is not what you intended to happen?
 3 **A. I believe that is opinion based.**
 4 Q. Well, is it an unfair opinion?
 5 THE CHAIRMAN: We know what happened. Perhaps you would
 6 like to move on to the point you are making.
 7 MR THOMAS: Sir, this is important because --
 8 THE CHAIRMAN: I am sure it is important, but we can move on
 9 I think.
 10 MR THOMAS: I will move on.
 11 THE CHAIRMAN: Thank you.
 12 MR THOMAS: Bearing in mind what had happened and you knew
 13 that you should have done an initial account, what is
 14 the explanation why you didn't do an initial account?
 15 **A. I can't answer that question.**
 16 Q. Why?
 17 **A. Whether it was under supervision orders, I don't know.**
 18 **I can't answer that question. I didn't make an initial**
 19 **account on the night.**
 20 Q. I know that, and you have told us that. I am looking at
 21 the reasons why that was, bearing in mind what had
 22 happened and your familiarity with the rules.
 23 Is it because somebody told you not to make
 24 an initial account?
 25 **A. That could well possibly have happened, yes.**

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<p>1 Q. That of itself would have been significant, because you 2 understood what the rules were -- 3 A. I had an understanding of the rules, yes. 4 Q. All right. 5 Why is it that you can provide us with no assistance 6 as to why, having known the rules, you didn't do what 7 you should have done? 8 A. I can't give you an answer, sir. 9 Q. Very well. Let me move on. 10 Still on the post-incident procedure, you knew that 11 a detailed account needed to be done within 48 hours, 12 you have a rest period, correct? 13 A. That's correct, yes. 14 Q. We know that that didn't happen for some six days. 15 Again, can you assist with a little bit more clarity in 16 relation to why that was? 17 A. Yes, because I was told at the time that it would be 18 between the IPCC and our supervision as to when we would 19 come in and make that statement. 20 Q. Are you saying, just so we are clear, you were told not 21 to make an account until that was cleared up? 22 A. Not to make my statement, that's correct. 23 Q. All right. 24 Who told you that? 25 A. I can't give you a specific, sir.</p> <p style="text-align: center;">Page 49</p>	<p>1 that had taken place. Your first fatality. Are you 2 saying you have absolutely no recollection of that? 3 A. Yes. 4 Q. Well were you not there then? 5 A. I mustn't have been. I don't recall attending a meeting 6 on the 8th, the day before. 7 Q. I am now moving to the incident itself. A couple of 8 questions and I have finished. 9 THE CHAIRMAN: Don't feel rushed, Mr Thomas. I just prefer 10 a slightly quicker run up to the wicket, that's all. 11 MR THOMAS: I shall lessen the spin. 12 In the incident itself on the night, you heard one 13 shot? 14 A. I heard one shot, yes. 15 Q. Are you able to discern whether that was a shot from 16 an MP5 or from a shotgun? 17 A. Not 100 per cent, no. 18 Q. When you say not 100 per cent, does that mean you don't 19 want to hazard a guess? 20 A. I wouldn't like to hazard a guess whether it was from 21 an MP5 or a shotgun. 22 Q. So you don't know? 23 A. I don't know. 24 Q. That was a shot that made you turn round was it or were 25 you already in the process of turning around?</p> <p style="text-align: center;">Page 51</p>
<p>1 Q. Okay. 2 Final point on the post-incident procedure and then 3 I am going to come to the events at the scene, okay. 4 The Police Firearms Officers' Association, are you 5 a member of it? 6 A. I am, yes. 7 Q. Right. We have been told that the day before you 8 actually did your final statements, your first detailed 9 statement -- 10 A. Yes. 11 Q. -- there was a meeting with your association and V53 the 12 officer in the Mark Duggan, right? 13 A. Yes, I have been told that, yes. 14 Q. Right. Can I just clarify what your evidence is. Are 15 you saying you weren't there or are you saying you have 16 absolutely no recollection of being there? 17 A. I don't recall being there. 18 Q. Can I just test that. As a police officer, as 19 a firearms officer, back in 2012, in March 2012, you 20 were aware of the rioting that happened across the 21 country when Mark Duggan was shot just the previous 22 August, in August 2011, would that be fair? 23 A. That would be fair, yes. 24 Q. The officer who shot Mark Duggan comes up to Manchester 25 to speak to your colleagues in relation to this shooting</p> <p style="text-align: center;">Page 50</p>	<p>1 A. No, that was when my colleagues turned around at the 2 same time I heard the gunshot, when they turned around. 3 Q. You are not able to say whether at the time of that 4 shot, there were other shots in succession or not? 5 A. No, I can't say that. 6 Q. Final question, this is my last question. 7 Again, just to assist the chairman, when you heard 8 that shot, did you hear anything, any other sounds at 9 the time of that shot, such as shouts of "Armed police", 10 or breaking glass, anything like that? 11 A. No, I didn't. 12 Q. Is that because you were too far away, do you think? 13 A. Could well be, but I only recall hearing one gunshot. 14 Q. If there were shouts, I mean to say, when you, firearms 15 officers, deploy, it is important, isn't it, to really 16 make yourself known that you are police? 17 A. Yes. 18 Q. And so, you know, when you deploy, it is not being said 19 in a normal voice. You, firearms officers, are really 20 shouting it, aren't you? 21 A. Yes. 22 Q. But you didn't hear any shouts of "armed police". 23 I said final topic. There is one thing I forgot and 24 it is in relation to your police identification markers, 25 your clothing and so forth.</p> <p style="text-align: center;">Page 52</p>

<p>1 A. Yes.</p> <p>2 Q. All of you officers are provided with identification</p> <p>3 markers, the caps, you have insignia on your jackets and</p> <p>4 so on and so forth, correct?</p> <p>5 A. Yes.</p> <p>6 Q. Can you just assist the chairman with this question.</p> <p>7 Bearing in mind that you know that this is going to be</p> <p>8 a fast-moving deployment, because that is the purpose</p> <p>9 behind it, you know that you want to secure compliance</p> <p>10 with the subjects and one of the ways of doing that is</p> <p>11 to show we are the police?</p> <p>12 A. Yes.</p> <p>13 Q. Visibility that you are the police is important once you</p> <p>14 deploy. I appreciate that for the lead up you want to</p> <p>15 remain covert --</p> <p>16 A. Yes.</p> <p>17 Q. -- but once you are out of your vehicles and going</p> <p>18 across to where the subjects are, the fact that you are</p> <p>19 police is very important, would you agree?</p> <p>20 A. I would agree, yes.</p> <p>21 Q. Right.</p> <p>22 With that in mind, why is it that you and your</p> <p>23 colleagues don't, as a matter of course, have your</p> <p>24 insignia out, your lapels out, markings on, when you</p> <p>25 pull up just before you deploy. What is the reason for</p> <p style="text-align: center;">Page 53</p>	<p>1 I just want to clarify a couple of matters with you. As</p> <p>2 you went down Common Lane, just before the three other</p> <p>3 officers in your car deployed --</p> <p>4 A. Yes.</p> <p>5 Q. -- you had lost sight of alpha, bravo and charlie?</p> <p>6 A. That's correct, yes.</p> <p>7 Q. Yes. You pulled over and the other officers deployed,</p> <p>8 yes?</p> <p>9 A. I just stopped in the middle of the road, yes.</p> <p>10 Q. You stopped in the middle of the road. Can I ask you to</p> <p>11 look at the photograph at 318?</p> <p>12 A. 318.</p> <p>13 Q. Yes, that is a picture of the car park where the</p> <p>14 shooting occurred and then it has the picture of the</p> <p>15 other car park in the top right, yes?</p> <p>16 A. Yes.</p> <p>17 Q. You came from bottom right diagonally left to the corner</p> <p>18 of the white building; is that right?</p> <p>19 A. That's correct, yes.</p> <p>20 Q. We can see a car poking out, it looks like on the</p> <p>21 pavement to me?</p> <p>22 A. Yes, it looks like a police car, yes.</p> <p>23 Q. Then a silver car up opposite?</p> <p>24 A. Yes.</p> <p>25 Q. Can you help us about where you stopped?</p> <p style="text-align: center;">Page 55</p>
<p>1 that?</p> <p>2 A. With it being a general question, I would deploy with my</p> <p>3 beanie cap and my strike jacket, in a general rule,</p> <p>4 I would deploy.</p> <p>5 Q. Okay. Well can you just help me with this. Did</p> <p>6 I understand your evidence earlier that you didn't have</p> <p>7 a respirator on?</p> <p>8 A. I didn't have a respirator on, no.</p> <p>9 Q. I also understood your evidence that you didn't have</p> <p>10 your beanie cap on.</p> <p>11 A. Not at the time.</p> <p>12 Q. Why not?</p> <p>13 A. Because I was covert in a covert vehicle.</p> <p>14 Q. No, but when you got out?</p> <p>15 A. On the car park?</p> <p>16 Q. Yes.</p> <p>17 A. I don't recall putting a beanie cap on, no.</p> <p>18 Q. That is what I am asking you. I am asking you why?</p> <p>19 A. I can't say whether I did or I didn't. I just don't</p> <p>20 recall putting one on.</p> <p>21 MR THOMAS: Sir, that is all I ask.</p> <p>22 THE CHAIRMAN: Mr Weatherby.</p> <p>23 Questions from MR WEATHERBY</p> <p>24 MR WEATHERBY: Yes, very quickly from me, officer,</p> <p>25 I represent Mr Grainger's partner. Nothing difficult,</p> <p style="text-align: center;">Page 54</p>	<p>1 A. I would say it was around about just in front of that</p> <p>2 silver vehicle.</p> <p>3 THE CHAIRMAN: I can't see a silver vehicle, I am just</p> <p>4 wondering if I've got -- yes, I think you have got as</p> <p>5 318 what I've got as 319. Okay, there is a silver</p> <p>6 vehicle, I now see where you are. So opposite the</p> <p>7 silver vehicle in that photograph?</p> <p>8 A. Yes, just prior to it.</p> <p>9 MR WEATHERBY: Just to clarify, if we were to draw a line</p> <p>10 between the police car and the silver vehicle, would</p> <p>11 that dissect your car?</p> <p>12 A. From recollection, yes.</p> <p>13 Q. Yes, okay, and you were stopped in your carriageway?</p> <p>14 A. In my carriageway, yes.</p> <p>15 Q. You said that the officers deployed leaving the doors</p> <p>16 open?</p> <p>17 A. Yes.</p> <p>18 Q. That would indicate rapid deployment?</p> <p>19 A. Yes.</p> <p>20 Q. Yes. Deployed to the car park on your offside, so the</p> <p>21 top right of the picture, because that is where you</p> <p>22 thought a vehicle strike was happening?</p> <p>23 A. Yes, that's correct.</p> <p>24 Q. Do you recall the last thing you heard over the radio</p> <p>25 before you stopped the car?</p> <p style="text-align: center;">Page 56</p>

<p>1 A. I can't recall that, sir, sorry.</p> <p>2 Q. Right. But it was presumably you heard Red called? Or</p> <p>3 can you not remember?</p> <p>4 A. I can't recall. But ...</p> <p>5 Q. Right. So if you believed that the strike was occurring</p> <p>6 in that car park, was there a reason you didn't drive</p> <p>7 round to the car park?</p> <p>8 A. I can only assume it was for the volume of traffic.</p> <p>9 Q. Right.</p> <p>10 A. There was a lot of traffic at around about that time.</p> <p>11 Q. The three officers have deployed from your car and</p> <p>12 presumably run across the road?</p> <p>13 A. Yes.</p> <p>14 Q. And you then hear this shot?</p> <p>15 A. Yes.</p> <p>16 Q. At the same time as you hear the shot, or</p> <p>17 instantaneously after, the other three officers turn</p> <p>18 round?</p> <p>19 A. That's correct, yes.</p> <p>20 Q. They turn round as a result of the shot?</p> <p>21 A. Yes, I would say so, yes.</p> <p>22 Q. Yes. Can you help us where they were on the picture,</p> <p>23 had they made it to the grass for example or to the car</p> <p>24 park?</p> <p>25 A. I don't think they did, I think they got just in front</p> <p style="text-align: center;">Page 57</p>	<p>1 it was simply because the traffic was such that you had</p> <p>2 to?</p> <p>3 A. A combination of the two, sir, yes.</p> <p>4 THE CHAIRMAN: Right.</p> <p>5 A. We couldn't see -- I couldn't see my colleagues and the</p> <p>6 volume of traffic.</p> <p>7 THE CHAIRMAN: I see. All right. Okay.</p> <p>8 The only other matter is this, at what stage did you</p> <p>9 actually drive delta on to the car park. I don't think</p> <p>10 you have told us, I know you didn't immediately, you</p> <p>11 went and spoke to -- was it U2?</p> <p>12 A. Yes, that's correct, sir.</p> <p>13 THE CHAIRMAN: At some point you came back with Q9. When</p> <p>14 did you actually drive the delta vehicle on to the --</p> <p>15 A. When I returned back to make my radio transmission,</p> <p>16 I then just drove forward slightly as not blocking the</p> <p>17 entrance to the car park.</p> <p>18 THE CHAIRMAN: Thank you very much.</p> <p>19 That is the end of your evidence, N7.</p> <p>20 Thank you for helping the Inquiry. You are now free</p> <p>21 to go.</p> <p>22 A. Thank you.</p> <p>23 THE CHAIRMAN: If you would like to go with Mrs Shaw.</p> <p>24 We will take a five-minute break.</p> <p>25 MS CARTWRIGHT: The next witness will be G1.</p> <p style="text-align: center;">Page 59</p>
<p>1 of my vehicle, maybe to the pavement.</p> <p>2 Q. Right, so they got onto the offside carriageway or the</p> <p>3 pavement and then the shot was heard and they ran back</p> <p>4 past your vehicle and round on to Jackson Avenue itself?</p> <p>5 A. Yes.</p> <p>6 MR WEATHERBY: Yes, thank you very much. That is all I ask.</p> <p>7 MS COLLINS: No questions, thank you, sir.</p> <p>8 MS WHYTE: Just one.</p> <p>9 Questions from MS WHYTE</p> <p>10 MS WHYTE: How quickly after bringing your vehicle to a stop</p> <p>11 did you hear the sound of a firearm?</p> <p>12 A. Seconds, I believe. It was my colleagues had alighted</p> <p>13 from the car and it was a couple of seconds, I would</p> <p>14 say.</p> <p>15 MS WHYTE: Thank you very much.</p> <p>16 Thank you, sir.</p> <p>17 Questions from THE CHAIRMAN</p> <p>18 THE CHAIRMAN: Just two quick points -- sorry, is there</p> <p>19 something else?</p> <p>20 MS CARTWRIGHT: No, sir.</p> <p>21 THE CHAIRMAN: Just to make sure I have understood what you</p> <p>22 said in response to Mr Weatherby, I think I do, when you</p> <p>23 brought the vehicle to a stop at the point on the</p> <p>24 photograph we have been talking about. That wasn't</p> <p>25 because you thought, "I need to stop the vehicle now",</p> <p style="text-align: center;">Page 58</p>	<p>1 THE CHAIRMAN: We will finish G1 by 1.00?</p> <p>2 MS CARTWRIGHT: That is the plan, sir.</p> <p>3 THE CHAIRMAN: It is going to happen.</p> <p>4 MS CARTWRIGHT: Yes.</p> <p>5 THE CHAIRMAN: Thank you.</p> <p>6 (11.38 am)</p> <p>7 (A short adjournment)</p> <p>8 (11.44 am)</p> <p>9 THE CHAIRMAN: Has Mr Davies had enough?</p> <p>10 MS CARTWRIGHT: G1, please, sir.</p> <p>11 G1 (sworn)</p> <p>12 THE CHAIRMAN: Thank you, G1. Would you mind remaining</p> <p>13 standing, it helps everybody and it will help you</p> <p>14 because you may be referred to documents. All right?</p> <p>15 A. Yes, sir.</p> <p>16 THE CHAIRMAN: Thank you.</p> <p>17 Questions from MS CARTWRIGHT</p> <p>18 MS CARTWRIGHT: Good morning, G1 --</p> <p>19 A. Morning.</p> <p>20 Q. -- my name is Sophie Cartwright and I ask questions on</p> <p>21 behalf the Inquiry. G1, could I ask you first of all do</p> <p>22 you see in front of you there is a cypher key with the</p> <p>23 officers' names next to their cypher, please can you</p> <p>24 refer to their cyphers as we move through your evidence,</p> <p>25 please.</p> <p style="text-align: center;">Page 60</p>

<p>1 Secondly, there should be a witness statement bundle 2 in front of you with G1 recorded. Could I just take you 3 through the various witness statements you have provided 4 as part of the investigation, please. Turning behind 5 tab 1, we see there your statement dated 9 March 2012. 6 A. Yes, I can see that. 7 Q. Tab 2, please, your statement of 28 May 2012. 8 A. Yes. 9 Q. Tab 3, the statement of 31 July 2014. 10 A. Yes. 11 Q. Then finally the statement that you provided dated 12 16 December 2016, behind tab 4. 13 A. Yes. 14 Q. Can I ask you, in respect of each of those four witness 15 statements, are the contents true to the best of your 16 knowledge and belief? 17 A. Yes. 18 Q. Perhaps if you leave the folder open there behind -- the 19 witness statement behind tab 4, I will come to that in 20 a moment. Before taking you into it, can I ask you to 21 confirm, please, when you became a police officer? 22 A. October 1993. 23 Q. Thank you. 24 In March 2012, what was your rank? 25 A. Sergeant.</p> <p style="text-align: center;">Page 61</p>	<p>1 January 2011. 2 Q. Thank you. 3 Can you assist as to in March 2012 your experience 4 in MASTS operations, please? 5 A. As in how many? 6 Q. Yes. 7 A. To be honest, I couldn't put a figure on it. 8 Q. Had you been involved in MASTS operations that had 9 resulted in decisive action before? 10 A. Yes. 11 Q. Are you able to assist at all with the number of 12 previous occasions? 13 A. I would say overall MASTS operations I had been deployed 14 on would run into hundreds. 15 Q. Thank you. 16 A. Deployments where there had been some form of decisive 17 action, probably coming up to somewhere around 100. 18 Q. Thank you. 19 Similarly deployments where special munitions had 20 been deployed, can you give any estimate as to that? 21 A. They are not deployed every time, so it certainly 22 wouldn't be on every operation that has come to 23 a decisive action. I would probably say about 24 40 per cent. 25 Q. Thank you.</p> <p style="text-align: center;">Page 63</p>
<p>1 Q. Are you still a sergeant? 2 A. That's correct. 3 Q. And still serving? 4 A. Yes. 5 Q. Thank you. What was your role in March 2012? 6 A. I was the team leader in the delta car. 7 Q. Thank you. We can see you were the team leader on 8 3 March 2012, but I think it is right, and we can see 9 from your index to your witness statement that in fact 10 you had performed the role of the OFC on a number of 11 previous deployments for Operation Shire? 12 A. That's correct. 13 Q. Those being 26 January 2012, 27 January, 30 January, 14 31 January, 1 February, 2 and 3 February 2012? 15 A. Correct. 16 Q. Can I just then ask you as well, in respect of when you 17 became an SFO, please? 18 A. I became a firearms officer in 1997, and further went on 19 to do SFO training or advanced training towards the end 20 of 1997/1998. 21 Q. Thank you. 22 Can you assist, are you trained as a CTSFO? 23 A. I am. 24 Q. When did you become a CTSFO? 25 A. I think the training commenced, started for that, around</p> <p style="text-align: center;">Page 62</p>	<p>1 THE CHAIRMAN: Is that 40 per cent of the decisive 2 interventions? 3 A. Yes. 4 MS CARTWRIGHT: Can I then take you into, please, your 5 witness statement dated 16 December 2016. That was 6 a witness statement I think specifically to deal with 7 issues relating to the CS dispersal canister. 8 A. Okay. 9 Q. I am not going to take you through the content of that, 10 because you have already confirmed the contents are 11 true, but I just want to deal with a number of 12 paragraphs where you have provided information to assist 13 the Inquiry. 14 Can I ask you first of all, please, to turn to 15 paragraph 19 of that witness statement behind tab 4, 16 please. 17 You set out within the witness statement that before 18 carrying out an operation, it is best practice to always 19 have a rehearsal prior to carrying out a live 20 deployment. It may seem an obvious question, but why is 21 it best practice to always have a rehearsal before 22 a live deployment? 23 A. It is just so that we can refresh various scenarios in 24 the officers' minds prior to deploying live. 25 Q. Yes. Then could I ask you, turning over the page to</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

1 paragraph 26, you set out:
 2 "With regard to live operations, tactics would be
 3 dependent on the needs of the operation. However as
 4 a general rule of thumb, depending on where an officer
 5 was sat in a vehicle, alpha, bravo, charlie, everyone
 6 was given a set objective and route to follow to deploy
 7 on to a subject vehicle."
 8 **A. It was subject to change that, actually. When**
 9 **I first – when I was first initially trained in MASTS,**
 10 **we had a card system. Everybody in each vehicle had**
 11 **a set door to go to and a set route to follow to get to**
 12 **that door.**
 13 Q. Yes.
 14 **A. After a period of time, and a consultation party was put**
 15 **together, we decided that this was probably not always**
 16 **the best practice, to be so specific and prescriptive as**
 17 **to where officers would go. We would – by the time**
 18 **this operation took place in 2012, the new thinking was**
 19 **and the new deployment standard was the objective would**
 20 **be the vehicle, the officers would deploy on the door**
 21 **nearest to where they were sat and they would move down**
 22 **that side of their vehicle to the objective.**
 23 **So it is not quite as it were when, prior to this,**
 24 **where we had a card with various lines and squiggles of**
 25 **officers moving across each other to get to set doors.**

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1 **Officers would deploy and prioritise dependent on who**
 2 **got to the vehicle first and, in a hierarchical order of**
 3 **threat, would prioritise where they felt they were best**
 4 **suited to deploy on to that vehicle.**
 5 Q. Yes, but having set that out, when you created this
 6 witness statement in December 2016 you characterised the
 7 position as set out in the witness statement as
 8 a general rule of thumb still.
 9 **A. I think that just might have been my poor explanation at**
 10 **the time.**
 11 Q. In terms of then the plan when officers are deployed, is
 12 that, perhaps going back to the questions I asked you
 13 a moment ago in terms of rehearsal, the benefit of
 14 a rehearsal before a live deployment is issues as to who
 15 is deploying where can be addressed specific to the
 16 facts of the deployment that day?
 17 **A. We could do live rehearsal – sorry, we do a rehearsal**
 18 **prior to the live deployment, would refresh it in**
 19 **people's minds. However, you have also got to bear in**
 20 **mind that actually come the time that we would carry out**
 21 **the strike, the vehicle might not be in exactly the same**
 22 **position or that people sitting in the vehicles, in the**
 23 **subject vehicle, might not be exactly how we had**
 24 **envisaged it in rehearsals. So it might be subject to**
 25 **tweaks and changes at the last minute by officers**

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1 **deploying.**
 2 Q. Yes.
 3 In terms of subject to tweaks for the officers
 4 deploying, would that be essentially the review on the
 5 ground when officers are deploying?
 6 **A. It would be a dynamic risk assessment carried out by**
 7 **those officers as they were approaching that vehicle.**
 8 Q. Can I ask you then to turn over the page, please, and
 9 just the one issue I just want to ask you about the
 10 CSDC, you tell us at paragraph 27:
 11 "If an officer was tasked with deploying a CSDC, the
 12 officer as they exited the vehicle would pull the pin on
 13 the canister making it ready for deployment if required
 14 or necessary. The canister would then be in one hand
 15 and an axe would be in the other. It would then be the
 16 responsibility of that officer to decide whether to
 17 deploy the canister into the subject vehicle or not."
 18 Yes?
 19 **A. Yes, dependent on -- we used to use axes. I think we**
 20 **have moved away from axes really. We have now got**
 21 **bespoke window breakers, an "axe" is just a phrase, it**
 22 **is just an old fashioned terminology of mine we say for**
 23 **using a window breaker.**
 24 Q. In terms of then pulling the pin effectively as you get
 25 out of the vehicle, it leaves one hand for whatever is

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1 used to break the window and the other hand to put the
 2 CSDC in?
 3 **A. That's correct.**
 4 Q. Having pulled the pin, and I think the officer then has
 5 to essentially depress, what happens if an officer makes
 6 a decision not to deploy the CSDC when the pin has been
 7 pulled?
 8 **A. You can't refit the pin, or you should never refit the**
 9 **pin, so we would then go down what we call a ditching**
 10 **drill. So the officer would seek a location away from**
 11 **the strike area, away from members of the public and**
 12 **other team members and would just simply throw it into**
 13 **an empty space for it to vent into the atmosphere.**
 14 Q. In terms of the ditching drill, was that something that
 15 was covered by GMP training in respect of the use of the
 16 CSDC?
 17 **A. Yes, it would have been.**
 18 Q. Can I just ask you briefly before we come to the events
 19 of 3 March, because you had been the OFC for
 20 Operation Shire on a number of occasions. Can I just
 21 look at two matters relating to the previous occasions
 22 where we have details of the briefings that you gave
 23 within Op Shire. Can I ask you, first of all, to look
 24 in the general AFO bundle, please, behind tab 19.
 25 We can see behind tab 19, it is the transcript of

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1 the record of the briefing for 3 February, which I think
 2 is the last occasion when you were the OFC before the
 3 deployments on the 2nd and 3rd, where X7 performed the
 4 role of the OFC.
 5 **A. Yes.**
 6 Q. Can I just ask you then, was there any particular reason
 7 why you didn't perform the function of the OFC on 2 and
 8 3 March, bearing in mind your historic involvement of
 9 acting in that role?
 10 **A. Sorry, why I didn't do it on what day?**
 11 Q. On 2 and 3 March --
 12 THE CHAIRMAN: Because you had been OFC on previous
 13 deployments.
 14 **A. I can't answer that, no. I don't know why.**
 15 Q. Can I ask you just following on from the question
 16 I asked you earlier about rehearsals, there is reference
 17 in that, this briefing on 3 February, that after the
 18 briefing there would then be a rehearsal of the tactic.
 19 Could I ask you then to turn to page 1174, and just
 20 following on from what I asked you earlier about
 21 rehearsals, you set out:
 22 "The plan there is final kit prep, err, I think we
 23 are going to do some rehearsals, if we have got time.
 24 You might be X Factor contestants with rehearsals, you
 25 cannot rehearse too much. In fact you look a bit like

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1 some of the X Factor contestants."
 2 We can see other references to rehearsals when you
 3 are the OFC, but certainly this as to essentially the
 4 messages you sent the officers away with on 3 February
 5 is you cannot over-rehearse, there is a benefit to
 6 rehearsal before live deployment?
 7 **A. I think there is always a benefit to rehearsing before**
 8 **we deploy.**
 9 Q. On 3 March 2012 when you were involved in the deployment
 10 as a team leader on the delta vehicle, can you, from
 11 your recollection, recall as to why there wasn't
 12 a rehearsal before officers left Openshaw that day?
 13 **A. Off the top of my head I can't recall why we didn't.**
 14 Q. Can I ask you, staying behind tab 19, please, we can see
 15 in the various PowerPoints when you are OFC, and I don't
 16 intend to take you to each example, but we can see in
 17 the transcript at page 1172.
 18 It is the second paragraph, please, on that page.
 19 We can see that within your PowerPoints, and we can see
 20 it expressed in the transcript here, that you have
 21 a contingency for if loss of sight happens in respect of
 22 the nominals. We see at 1172 you set out:
 23 "If the subject enters the premises, the property is
 24 to be contained and the OFC to refer back to the TFC.
 25 If the subjects separate a two-car MASTS may be required

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1 and may involve the team splitting."
 2 Then you go on:
 3 "If there is a loss on the subjects, consideration
 4 to mitigating action ... utilising marked police
 5 vehicles will be given and deployed if appropriate."
 6 Can I ask you then in terms of we can see within
 7 your PowerPoints, when you were the OFC, there being
 8 a specific contingency to address loss of sight. Can
 9 you assist as to why that was important in your
 10 briefings when you were the OFC and the use essentially
 11 of utilising marked police vehicles in that scenario?
 12 **A. That will have been a tactical parameter that will have**
 13 **been given to me by the TFC to deliver.**
 14 Q. Yes, but can you assist, because certainly in the
 15 PowerPoints and the briefings for 2 and 3 March, there
 16 isn't that contingency as to the loss of sight and use
 17 of police vehicles if there was a loss of sight, can you
 18 recall that?
 19 **A. I can't recall -- if there was on 3 March?**
 20 Q. No, in both the PowerPoints, 2 and 3 March, there is no
 21 contingency for a loss of sight of the subjects and
 22 using a marked vehicle that we see in your PowerPoints
 23 or in the PowerPoints when you were the OFC and the
 24 briefings?
 25 **A. There is.**

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1 Q. There is in yours --
 2 **A. Yes.**
 3 Q. -- but we don't then see it on 2 and 3 March
 4 deployments.
 5 **A. I can't give an answer as to why someone has not**
 6 **included that in their briefing.**
 7 Q. In terms of was it important within briefings where you
 8 were involved as the OFC to have that contingency if
 9 there is loss of sight?
 10 **A. I would think that that is important, but again I think**
 11 **that that is a tactical parameter that has also been**
 12 **considered by the TFC and given to me to include.**
 13 Q. Yes.
 14 THE CHAIRMAN: When you talk about loss of sight, are you
 15 talking about a loss of sight that occurs after a strike
 16 has been initiated or before that?
 17 **A. We are talking here, sir, about a loss of sight before**
 18 **a strike has been initiated and the surveillance team**
 19 **lose control of the offenders, or potential offenders,**
 20 **we need to put mitigation in to prevent them carrying**
 21 **out any action.**
 22 THE CHAIRMAN: I understand. As opposed to subjects
 23 managing to get away during a strike?
 24 **A. Yes.**
 25 THE CHAIRMAN: Thank you.

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1 MS CARTWRIGHT: Thank you.
 2 Could I then please take you to your witness
 3 statement, please, behind tab 1, G1. There should also
 4 be a copy of a flip chart.
 5 The Inquiry has heard evidence that the flip chart,
 6 there are three pages there that represent what was on
 7 the flip chart, was available and used on 9 March when
 8 the officers including you prepared your first witness
 9 statement. Do you recall that?
 10 **A. Yes.**
 11 Q. I just refer you to that at the outset because we can
 12 see within your witness statement that various times
 13 that are recorded on the flip chart then appear in your
 14 witness statement, such as: parading on at 4.30 in the
 15 morning; at 6.15, receiving the information to cause you
 16 to leave Leigh police station; the incorrect
 17 registration number of the Audi.
 18 Can I ask you in respect of those timings within
 19 your witness statement, did you take them from the flip
 20 chart or was it information that was within your
 21 knowledge at that time?
 22 **A. I think I would have taken those from the flip chart.**
 23 Q. Can you assist as to why you were relying on that
 24 information in the flip chart rather than your best
 25 recollection of things?

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1 **A. Because that was what I thought was the most accurate.**
 2 Q. Why did you think it was most accurate?
 3 **A. I think it is as I have recalled it, but it has been**
 4 **agreed that those were the time that things had**
 5 **happened.**
 6 Q. In terms of saying it has been agreed that those were
 7 the times that things happen, been agreed by who?
 8 **A. The chap who has written the flip chart and presented**
 9 **that to us as evidence -- sorry, presented that as**
 10 **an exhibit.**
 11 Q. Was that J4?
 12 **A. Yes.**
 13 Q. Do you know where J4 obtained the timings that are on
 14 that flip chart?
 15 **A. I am assuming those are from logs that were kept at the**
 16 **time.**
 17 Q. Okay.
 18 Thank you. You have already told us that you were
 19 the team leader for the delta vehicle. Can you assist
 20 as to what specific role the team leader plays within
 21 the delta vehicle?
 22 **A. Liaising -- obviously liaising with the OFC for the rest**
 23 **of the team.**
 24 Q. Yes.
 25 **A. Ensuring welfare issues within the vehicle, within our**

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1 **team. And any planning or contingencies that might be**
 2 **required for our vehicle to carry out.**
 3 Q. Can you assist, in terms of identifying welfare issues
 4 within your team, can you be clear what you mean by
 5 that?
 6 **A. Well, I am the conduit to the rest of the team, so if we**
 7 **were holding in a separate area to other people, which**
 8 **I think we were later on in this operation, people need**
 9 **comfort breaks, depending upon how long we were going to**
 10 **be deployed for then that is down to me to orchestrate**
 11 **that and find relief or find someone else to take over**
 12 **our role temporarily while we do that.**
 13 Q. Can I ask in terms of your role as team leader for
 14 welfare, we know from various evidence that you were
 15 called in at 4.30 in the morning. Just dealing with you
 16 first of all without asking specifically where you live,
 17 roughly what time would you have to leave in order to
 18 get to Openshaw for 4.30 in the morning?
 19 **A. For 4.30, probably about 4.00/3.50.**
 20 Q. Can you assist in terms of when you paraded on that day,
 21 how long you expected a tour of duty to be likely to be
 22 that day?
 23 **A. Off recollection, I can't think if I had any expectation**
 24 **about how long it would be, I can't remember.**
 25 **However, from experience, these types of operations**

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1 **do tend to run on somewhat, time wise, certainly more**
 2 **than sort of a conventional 8-hour or 10-hour tour of**
 3 **duty. But that is how these operations run.**
 4 Q. Can I ask then, in terms of when a deployment runs on,
 5 as this one did, and certainly by 4.00 in the afternoon,
 6 officers had been on duty for a number of hours. When,
 7 as a team leader responsible for welfare, do you look as
 8 to when the tour of duty is likely to end or whether
 9 replacements need to come in, how is that addressed?
 10 **A. That will have been asked of by the OFC, who will then**
 11 **have confirmed that with the TFC and in consultation**
 12 **with the TAC adviser as well.**
 13 Q. Can I ask then, during the period of time then when you
 14 were at Leigh police station, can you assist as to what
 15 you were doing?
 16 **A. I would have remained with the team as a whole, we were**
 17 **all parked up there together, all four vehicles. We**
 18 **would have been resting, talking, people would have been**
 19 **reading.**
 20 Q. Can I ask, were you actually in Leigh police station or
 21 did you remain in the vehicle?
 22 **A. Off the top of my head I cannot remember. We may have**
 23 **remained in the vehicles in the garage or if we had have**
 24 **managed to find a quiet room within the police station,**
 25 **we may have moved in there, but I honestly can't**

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<p>1 remember.</p> <p>2 Q. When you say you were talking, are officers talking</p> <p>3 about the deployment when you are all sort of sat round</p> <p>4 together?</p> <p>5 A. They talk about all sorts when we are sat round</p> <p>6 together.</p> <p>7 Q. Can I ask you then, your statement tells us at 6.15 in</p> <p>8 the evening, you received information that caused delta</p> <p>9 and I think alpha, bravo and charlie to leave Leigh</p> <p>10 police station.</p> <p>11 A. Yes.</p> <p>12 Q. Do you recall what specifically caused the vehicles to</p> <p>13 make their way away from Leigh police station at that</p> <p>14 time?</p> <p>15 A. I can't recall the specific words, what caused us to</p> <p>16 move, but I think it would have been something in</p> <p>17 relation to the subject vehicle moving towards the</p> <p>18 Culcheth area.</p> <p>19 Q. Do you remember who gave you that information?</p> <p>20 A. I can't remember who specifically gave it me, but</p> <p>21 I would assume that would have come from the OFC on the</p> <p>22 day.</p> <p>23 Q. I think you then go to a lay up point at the Raven Inn,</p> <p>24 which is I think Glazebury, near to Culcheth?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 77</p>	<p>1 to Culcheth.</p> <p>2 Q. Did you play any part as the team leader in the decision</p> <p>3 to park on Church Lane at that time?</p> <p>4 A. I would have been involved in the decision-making</p> <p>5 process for that, yes.</p> <p>6 Q. Can you assist then as to why you chose Church Lane to</p> <p>7 park on?</p> <p>8 A. I think we just felt that was the most appropriate place</p> <p>9 at the time.</p> <p>10 Q. Can I ask, had you travelled to Culcheth before that</p> <p>11 day?</p> <p>12 A. I don't remember. I don't know, to be honest.</p> <p>13 Q. Can you assist, had you made yourself during the day</p> <p>14 familiar with the road layout of Culcheth?</p> <p>15 A. I had had a look at the maps, yes.</p> <p>16 Q. Because I think it is right, isn't it, in the briefing</p> <p>17 in the morning attention has been drawn to where the</p> <p>18 vehicle had previously parked, namely the park on</p> <p>19 Jackson Avenue. So specific detail was given as to</p> <p>20 where the vehicle had previously been seen, do you</p> <p>21 recall that?</p> <p>22 A. Yes.</p> <p>23 Q. You set out in your witness statement that:</p> <p>24 "My vehicle's role now was to intercept any subjects</p> <p>25 on foot should an arrest be authorised."</p> <p style="text-align: center;">Page 79</p>
<p>1 Q. Who identified that lay up point for you?</p> <p>2 A. Off the top of my head, I don't recall.</p> <p>3 Q. Do you recall how long you were at the Raven Inn car</p> <p>4 park before the vehicle moved again?</p> <p>5 A. Not without reading my statement and refreshing my</p> <p>6 memory, no.</p> <p>7 Q. I don't think your statement specifically addresses it,</p> <p>8 it just says:</p> <p>9 "Whilst en route we held temporarily on the car park</p> <p>10 of the Raven Inn, Warrington Road. As a result of</p> <p>11 further information received my vehicle was instructed</p> <p>12 to move nearer to the Culcheth area."</p> <p>13 THE CHAIRMAN: You are welcome to follow this if you want in</p> <p>14 your statement.</p> <p>15 MS CARTWRIGHT: Are you able to assist as to roughly what</p> <p>16 period of time?</p> <p>17 A. No, off the top of my head, no.</p> <p>18 Q. You set out within your witness statement that you were:</p> <p>19 "... instructed to move nearer to Culcheth, and we</p> <p>20 parked on Church Lane, about 150 metres from the</p> <p>21 junction of Warrington Road and remained there awaiting</p> <p>22 further instructions."</p> <p>23 Do you recall the instruction being in fact to go</p> <p>24 and lay up near to Common Lane and Jackson Avenue?</p> <p>25 A. Not specifically. I think we were told to move nearer</p> <p style="text-align: center;">Page 78</p>	<p>1 A. Yes.</p> <p>2 Q. Can you assist as to who gave that direction as to that</p> <p>3 was what the role of the delta vehicle was?</p> <p>4 A. Again, that will have come from the OFC.</p> <p>5 Q. You go on in your witness statement to say:</p> <p>6 "A short time later I was aware that the rest of</p> <p>7 team were now making their way to a car park off Jackson</p> <p>8 lane, off Common Lane in Culcheth village. Authority</p> <p>9 had now been given to arrest the subjects of the</p> <p>10 operation and we were now at condition Amber."</p> <p>11 Yes?</p> <p>12 A. Yes.</p> <p>13 Q. Can you assist at all as to the time State Amber was</p> <p>14 called?</p> <p>15 A. I don't recall off the top of my head.</p> <p>16 Q. You set out:</p> <p>17 "It was now our intention to meet up with the rest</p> <p>18 of the team whilst they were en route, drop on to the</p> <p>19 back of their vehicle convoy and support them as</p> <p>20 necessary."</p> <p>21 A. Yes.</p> <p>22 Q. In terms of that being the plan, when had that been</p> <p>23 formulated or how was that formulated?</p> <p>24 A. The -- I think the deployment had now changed from</p> <p>25 a foot deployment, it was we were no longer required as</p> <p style="text-align: center;">Page 80</p>

1 a foot contingency and the vehicles were obviously
 2 manoeuvring, or were moving through the surveillance
 3 bubble to look at a vehicle option. And we would now,
 4 that is my decision then, to drop back on to the back of
 5 the charlie car, the back of the MASTS convoy, to assist
 6 with the general intervention.
 7 Q. Do you then as team leader communicate that as the plan
 8 to the occupants of the delta vehicle?
 9 A. Yes.
 10 Q. Can I ask then in terms of delta following charlie to
 11 fill in, what does that then specifically involve for
 12 those officers deploying out of delta, in terms of
 13 a plan as you move?
 14 A. How do you mean, actually at the point of intervention
 15 or en route?
 16 Q. In practice -- we know what happened because delta does
 17 not in fact join the convoy, but when delta is filling
 18 in, in terms of officers deploying out?
 19 A. The plan is that we would follow the other three
 20 vehicles and then hopefully arrive at the strike
 21 point --
 22 Q. Yes?
 23 A. -- as a four-car convoy and then the officers in my
 24 vehicle would deploy and make their way to the objective
 25 and fill in as necessary, where required.

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1 Q. In terms of filling in as necessary, can you assist as
 2 to is that a dynamic thing or is there any form of
 3 discussion about where various people will go in that
 4 scenario?
 5 A. Again, it is a dynamic thing, we are the fourth vehicle
 6 in the convoy. Usually speaking we are the last vehicle
 7 to arrive. By the time we arrive, other officers will
 8 have deployed and already be making their way to the
 9 vehicle. Our role now is to assess, again, go through
 10 a hierarchical order of threats, fill in where we think
 11 necessary and then also assist with the containment and
 12 cordons keeping the public away.
 13 Q. Can I ask then, as you moved from Church Lane, I think
 14 you see the alpha, bravo, charlie vehicle go past along
 15 Common Lane but I think because of the weight of
 16 traffic, you are not able to join the end of convoy,
 17 yes?
 18 A. That's correct.
 19 Q. Can you assist at that time have the occupants,
 20 including, got ready essentially for the movement of the
 21 operation by way of putting any respirators on or
 22 donning clothing? Can you assist as to what is going on
 23 at this time in the delta vehicle?
 24 A. Yes, it becomes fast moving now. Certainly for us, at
 25 the end of the convoy, so the officers in the vehicle,

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1 I know for myself, I had a respirator on, I was starting
 2 to fit my respirator, I had a strike -- what we call
 3 a police strike jacket. I was starting to remove the --
 4 put the police badges on show so I was recognisable.
 5 Q. We have seen an example of a strike jacket, essentially
 6 the one we have seen is a black jacket where out of the
 7 pocket there was a flap comes down that says "Police"
 8 on, did yours just have "Police" on the pocket of your
 9 strike jacket or was there any place --
 10 A. There might have been one on the back, but I don't
 11 recall whether I had time to actually deploy that or not
 12 as well.
 13 Q. I think the Inquiry has also heard evidence that when
 14 you are wearing a respirator, you are not able then to
 15 wear your police issue cap?
 16 A. That's correct.
 17 Q. Your witness statement, and again I am on page 181, now,
 18 G1, sets out:
 19 "As we made our way along Common Lane I realised
 20 that we were still separated from the rest of the team.
 21 As a result of information received by the police radio
 22 I became aware of a car park by a group of shops on my
 23 right-hand side. I could not see the entrance to the
 24 car park or which road it was off. I was now scanning
 25 the car park from my vehicle in an attempt to locate our

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1 other three vehicles and also the subject vehicle."
 2 Could I ask you please to just look at a photograph.
 3 We have been assisted already by N7 in identification of
 4 locations, but I just want to show you to give you
 5 an opportunity to just comment. It is bundle O1,
 6 please.
 7 THE CHAIRMAN: Ms Curran will give you the relevant file.
 8 MS CARTWRIGHT: It is page 318, please, within that bundle,
 9 there should be numbers in the top right-hand corner.
 10 You have mentioned scanning for the car park, we can
 11 see on page 318, in fact the car park I think where the
 12 incident took place on Jackson Avenue. Can you see
 13 that, G1?
 14 A. Yes.
 15 Q. Then to the right of that area, the top right-hand
 16 corner of the photograph if it is horizontally,
 17 a further car park to the right-hand side?
 18 A. Yes.
 19 Q. I think was it at that time that car park to which your
 20 attention was drawn?
 21 A. Yes, we were stuck in standing traffic, separated from
 22 the rest of our team, I could hear on the radio that
 23 they were now moving to condition Red and preparing to
 24 do the strike.
 25 Q. Yes.

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1 **A. And I have clearly mistaken the car park on my right for**
 2 **the car park which our officers were actually moving on**
 3 **to.**
 4 Q. Yes.
 5 **A. We weren't getting any further in standing traffic with**
 6 **the vehicle, and I took the decision then to deploy on**
 7 **foot with my team and run to the, towards the car park,**
 8 **in the anticipation that any moment now we would see our**
 9 **three vehicles converging on one vehicle and we would**
 10 **know where to head for.**
 11 Q. Thank you. Just pausing there, in terms of the car park
 12 to which you are heading, had it been relayed over the
 13 radio which car park the strike was taking place on?
 14 **A. It may well have been. However, in the sort of final**
 15 **seconds as we were moving up, that might have been**
 16 **missed or might have not come through clearly. It is**
 17 **clearly I have mistaken that car park for the correct**
 18 **car park.**
 19 Q. If we just look at the photograph, we have heard from X7
 20 that you can see a telephone box I think near a silver
 21 vehicle. Can you see that?
 22 **A. Yes.**
 23 Q. He has identified that he brought the delta vehicle to
 24 a stop just past the junction of Jackson Avenue and
 25 almost between the police vehicle we can see with its

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1 nose just slightly poking out and the other small silver
 2 vehicle, so coming to a stop somewhere around that area?
 3 **A. Yes.**
 4 Q. I think notwithstanding that you can't see alpha, bravo,
 5 charlie, I think you get out of the vehicle with
 6 Mr Higgins and V3 and head out on foot towards the
 7 direction of the car park to your right?
 8 **A. Yes, again it is hard to recall at the time whether, you**
 9 **know, they was talking about the car park, have I got**
 10 **this wrong, have I misread the maps, is the car park**
 11 **there the one on the right or have I just missed it on**
 12 **the radio? But at the time when they were on the car**
 13 **park, we were -- that was the only car park we could**
 14 **see. And we took the decision to -- or I took the**
 15 **decision to take the team to that car park.**
 16 Q. Your witness statement sets out that you were:
 17 "... aware that we were at condition Red and that X7
 18 was now controlling the deployment of our armed
 19 officers."
 20 That you continued to scan the car park to your
 21 right, you could hear X7 on the radio coordinating the
 22 arrest of three subjects who were in the subject
 23 vehicle, yes?
 24 **A. Yes.**
 25 Q. That is as you are deploying out of the delta vehicle,

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1 that is what you can hear over the radio?
 2 **A. Yes.**
 3 Q. Just dealing with the traffic, I think it is Saturday
 4 evening in Culcheth village and you described the
 5 traffic as stationary, there was quite a lot of members
 6 of the public around, would you agree with that?
 7 **A. Again, I think I covered this in a further statement.**
 8 **There would have been members of the public around,**
 9 **however give or take one or two that I passed, I have no**
 10 **recollection of how many were there.**
 11 Q. Can you assist then, when you got out of the delta
 12 vehicle, because we have heard from N7 that it was
 13 essentially fast moving out, in terms of no doors on the
 14 vehicle were shut as you left the vehicle and I think it
 15 also describes a respirator dropping as well. Can you
 16 recall whose respirator that would have been?
 17 **A. Off the top of my head, no.**
 18 Q. As you get out of the delta vehicle, you were wearing
 19 your respirator --
 20 **A. Yes.**
 21 Q. -- and you have put the pocket out on your strike
 22 jacket?
 23 **A. Yes.**
 24 Q. Can you assist then how far you got towards the car park
 25 before you changed direction, please?

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1 **A. I think I had fully crossed the road --**
 2 Q. Yes.
 3 **A. -- and I was on to the grass verge between the road and**
 4 **the car park when I changed direction.**
 5 Q. What caused you to change direction?
 6 **A. I heard a loud bang behind me.**
 7 Q. In terms of behind you, is that coming from essentially
 8 the car park on Jackson Avenue where we know the strike
 9 took place?
 10 **A. Yes.**
 11 Q. Can you assist as to what the loud bang sounded like?
 12 **A. Well, it sounded like a gunshot.**
 13 Q. Just so we are clear, in terms of how far you had got,
 14 you heard the gunshot when you were on the grass verge
 15 on the photograph on page 318 near to the car parks?
 16 **A. I would say, yes, just on to the grass verge.**
 17 Q. I think it is the sound of that that makes you realise
 18 you are heading towards the wrong car park?
 19 **A. Yes, that's correct.**
 20 Q. I think you then shout to V3 and V8, turn round and head
 21 towards the other car park?
 22 **A. Yes, that's correct.**
 23 Q. Would it be a fair summary to say that you would be
 24 running at this time?
 25 **A. We were running before, so we just carried -- we turned**

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1 **round and carried on running.**
 2 Q. In terms of if we just again use the photograph from
 3 page 318, in terms of then the path you took to get to
 4 where the strike had taken place. Having crossed the
 5 road, did you go essentially round on to Jackson Avenue
 6 and up the road?
 7 **A. On to – past the corner of the white building, and then**
 8 **as I came round the back of the white building I could**
 9 **see the car park in front of me and to my right, in the**
 10 **far right-hand corner, the subject vehicle and our**
 11 **alpha, bravo and charlie cars on that vehicle.**
 12 Q. Can you estimate as to how many seconds it would have
 13 taken you to run the distance from where you were on the
 14 grass verge when you heard the loud bang to getting onto
 15 the car park on Jackson Avenue?
 16 **A. 15/20/25 seconds.**
 17 Q. You describe in your witness statement that when you get
 18 to the car park you see the red Audi subject vehicle in
 19 the far right corner and that the vehicle was blocked in
 20 and that you ran towards the vehicle and you could see
 21 two subjects, who you knew to be David Totton and
 22 Joseph Travers, being arrested by your colleagues?
 23 **A. Yes, that's correct.**
 24 Q. Again, if from the bang to running, which would have
 25 taken 20 to 25 seconds, by the time you get to the

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1 vehicle, the arrest is taking place of Totton and
 2 Travers?
 3 **A. Yes, that's correct.**
 4 Q. You also describe seeing your colleagues trying to
 5 remove the driver, Mr Grainger, from the vehicle, and
 6 you could hear officers shouting, "He has been shot".
 7 **A. That's correct.**
 8 Q. Are you able to assist at all in terms of the other
 9 officers from alpha, bravo and charlie, where any of
 10 they specifically were at that time when you came upon
 11 the car, the red Audi?
 12 **A. Where they specifically were? No.**
 13 Q. You then describe, essentially, a trauma kit being
 14 requested and first aid being administered and trauma
 15 care to Mr Grainger.
 16 **A. That's correct.**
 17 Q. You also noted that Mr Totton and Mr Travers were secure
 18 having been arrested.
 19 **A. Yes.**
 20 Q. And you clarified that an ambulance had been requested.
 21 At that stage I think you describe you saw X9 and asked
 22 who the principal officer was?
 23 **A. Yes.**
 24 Q. Essentially that question is: who fired the shot?
 25 **A. Who the principal officer is, yes.**

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1 Q. Yes.
 2 Beyond that question, was there any other discussion
 3 with X9?
 4 **A. No.**
 5 Q. But X9 was able to identify Q9 to you?
 6 **A. He was able to identify Q9.**
 7 Q. What did you then do?
 8 **A. I located Q9, once I had – sorry, I made sure that the**
 9 **scene was secure, Travers and Totton were secure. First**
 10 **aid was being administered to Mr Grainger, I then**
 11 **located Q9 and sat him in the back of my vehicle.**
 12 Q. The back of your vehicle being the delta vehicle?
 13 **A. Yes, which by now that had caught us up.**
 14 Q. If we look on page 318, we have heard from N7, we can
 15 see the delta vehicle in the photograph but N7 has given
 16 evidence that it was not specifically in that position
 17 but was at the time on Jackson Avenue car park, albeit
 18 not in the position we see on the photo. Does that fit
 19 with your recollection?
 20 **A. Yes, I think it was moved to facilitate a surveillance**
 21 **vehicle being moved.**
 22 Q. When you had taken Q9 to your delta vehicle, was there
 23 any discussion with Q9?
 24 **A. No.**
 25 Q. You set out then that you and N7 were with Q9 at that

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1 time.
 2 **A. That's correct.**
 3 Q. N7 does recall that there was conversation at this time,
 4 not about the incident but sort of welfare questions
 5 and --
 6 **A. I think there might have been welfare questions but, to**
 7 **be honest, he wasn't in the mood for talking.**
 8 Q. You set out that you then contacted Mr Granby informing
 9 him that unless there were any strong objections that
 10 you and N7 were going to take Q9 back to the office at
 11 Openshaw.
 12 **A. That's correct.**
 13 Q. Why was that?
 14 **A. Just to get him away from the scene.**
 15 Q. I think we have heard evidence from N7 that I think you
 16 sought the assistance of a surveillance officer to use
 17 his vehicle to take you back to the office?
 18 **A. That is possibly why our vehicle might have moved.**
 19 Q. You set out that Q9 and N7 when you were back at the
 20 unit at Openshaw remained with you until the
 21 post-incident manager and the rest of the team finally
 22 returned.
 23 **A. That's correct.**
 24 Q. Are you able to identify who the post-incident manager
 25 was?

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1 **A. I think it was Mr Simpson.**
 2 Q. Can you recall any non-conferral warning being given at
 3 any point, either at Jackson Avenue car park or once you
 4 got back to Openshaw?
 5 **A. In what respect?**
 6 Q. That you weren't to confer in respect of the accounts as
 7 to what happened.
 8 **A. I don't recall, to be honest.**
 9 Q. You set out in your statement, "Post-incident procedures
 10 then commenced". Can you assist as to what you mean by
 11 that?
 12 **A. Post-incident procedures, the post-incident manager**
 13 **Mr Simpson then went through the post-incident**
 14 **procedures booklet or guide and then guided us through**
 15 **the necessary next steps of what was going to happen**
 16 **with regards to our welfare and the investigation**
 17 **process.**
 18 Q. Was that at the time when all the AFOs were back at the
 19 office or was this just a time when it was you, N7 and
 20 Q9?
 21 **A. No, it was when the team had finally returned.**
 22 Q. Can you assist as to what was said about provision of
 23 first accounts and provision of witness statements at
 24 that time?
 25 **A. Off the top of my head, I can't recall exactly what was**

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1 **said.**
 2 Q. Can you assist as to whether you created any first
 3 account back at the station that evening?
 4 **A. I don't think I did.**
 5 Q. Why was that?
 6 **A. I don't think I was asked to do one.**
 7 Q. But even, not being asked to do one, did you not think
 8 it was important to get down contemporaneously the
 9 events that had happened that evening?
 10 **A. I think they -- I just can't recall what had happened,**
 11 **what happened, to be honest.**
 12 Q. Following on from 3 March, the Inquiry has heard
 13 evidence that there was a visit from the PFOA,
 14 Mr Williams, which also involved V53, the officer
 15 involved in the Mark Duggan shooting, attending to
 16 address the officers that had been involved in the
 17 incident. Do you recall being part of that meeting on
 18 8 March 2012?
 19 **A. I can't remember if I was there or not, to be honest.**
 20 Q. Can I ask, in terms of obviously a visit from the
 21 shooter that had been involved in Duggan would be
 22 something that one would expect would stick out in your
 23 memory. Was that because you weren't there or just
 24 could have been there but just don't recall?
 25 **A. I just don't recall. I would have thought that it would**

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1 **stick out, but I don't ...**
 2 Q. Can you assist then, if we move from 3 March, did you
 3 create any note or account before you attended
 4 Nexus House on 9 March 2012?
 5 **A. No.**
 6 Q. Why didn't you?
 7 **A. I don't recall, to be honest.**
 8 Q. How did it come about that you attended Nexus House on
 9 9 March?
 10 **A. Under advisement we were told to go to Nexus House to**
 11 **compile our statements. I think on the run-up to this,**
 12 **we were keen to put statements in --**
 13 Q. Yes.
 14 **A. -- and I think the IPCC, who at the time were leading**
 15 **the investigation into what had happened, were at**
 16 **loggerheads with the post-incident team.**
 17 Q. Can you assist as to how you were provided with the
 18 information about this impasse or loggerheads between
 19 the IPCC and the post-incident manager, were you told
 20 this or did you hear it?
 21 **A. I think it just became apparent through the process, to**
 22 **be honest.**
 23 Q. Are you able to assist as to what the loggerhead was,
 24 what the issue was about officers providing a witness
 25 statement as near to the events as possible?

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1 **A. I can't remember exactly what it was. The advice, the**
 2 **IPCC wanted -- I can't remember what they were**
 3 **specifically asking for, but the post-incident**
 4 **procedures team were saying that is not part of the**
 5 **procedure.**
 6 Q. You set out in your witness statement that you commenced
 7 your 9 March 2012 witness statement commencing at 1.15
 8 in the afternoon and this was a statement created in the
 9 presence of your colleagues --
 10 **A. That's correct.**
 11 Q. -- and that from time to time you clarified with your
 12 colleagues matters relating to times, vehicles,
 13 locations and suspect details.
 14 **A. As per the flip charts.**
 15 Q. In terms of, did you not think at the time actually
 16 discussing your witness statement with other officers
 17 was perhaps not the best way to go, that you would be
 18 far better dealing with your recollection of events,
 19 rather than gathering information from the officers in
 20 the room?
 21 **A. Again, as I recall I think that is just how we were**
 22 **advised to do it at the time.**
 23 Q. Again in terms of -- I don't want to know the advice,
 24 but who was advising you at that stage in terms of
 25 process of collating your witness statement?

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1 **A. There was a solicitor present at the time, as well.**
 2 MS CARTWRIGHT: Thank you, G1.
 3 THE CHAIRMAN: Ms Cartwright, before you sit down, it may be
 4 that you have covered it with this witness but I know
 5 that you have asked other firearms officers about their
 6 approach to and interpretation of certain details given
 7 at the briefing.
 8 MS CARTWRIGHT: Sir, thank you.
 9 THE CHAIRMAN: I am not sure that you have with this
 10 officer --
 11 MS CARTWRIGHT: I appreciate that. Thank you, sir.
 12 THE CHAIRMAN: -- and you may have meant to.
 13 MS CARTWRIGHT: Thank you.
 14 I do apologise, G1, there are just questions of
 15 interpretation I want to ask you by reference to the
 16 briefing given on 3 March. I apologise for not
 17 addressing that.
 18 Tab 22, please, of the AFO bundle. At page 1267, do
 19 you have the heading "Information and intelligence"?
 20 **A. Yes.**
 21 Q. We can see reference to:
 22 "The subjects of this operation are believed to be
 23 engaged in armed robberies in the north-west region."
 24 **A. Yes.**
 25 Q. Over the page, in respect of each threat assessment for

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1 each of the nominals for the three pages that follow,
 2 the content being, "Conspiracy to commit armed robbery".
 3 **A. Yes.**
 4 Q. What did you understand the terminology "armed robbery"
 5 to mean?
 6 **A. Armed with firearms or otherwise so dangerous.**
 7 Q. In terms of armed with firearms or otherwise so
 8 dangerous --
 9 **A. Other weapons.**
 10 Q. Other weapons, so you didn't take that just to mean
 11 armed with a firearm, it could be armed with a firearm
 12 or any other form of weapon?
 13 **A. That's correct.**
 14 Q. Thank you.
 15 Staying on page 1267, please, G1, we can see, and we
 16 see it from the transcript as well, recorded that there
 17 was intelligence to suggest that these subjects were
 18 responsible for a robbery in 2008 in Preston and then
 19 a little further down it goes on in respect of that
 20 robbery, "The subjects made good their escape with
 21 a substantial amount of money".
 22 By reference to "subjects", did you understand that
 23 intelligence related to each of the nominals at that
 24 time, namely David Totton, Robert Rimmer and
 25 Anthony Grainger?

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1 **A. That's correct, that says:**
 2 **"These subjects were responsible ..."**
 3 MS CARTWRIGHT: Yes.
 4 Thank you.
 5 Sir, thank you --
 6 THE CHAIRMAN: Does that cover everything?
 7 MS CARTWRIGHT: -- I appreciate you drawing that to my
 8 attention.
 9 THE CHAIRMAN: Yes, Mr Thomas.
 10 Sorry to have interrupted.
 11 MR THOMAS: Thank you, sir.
 12 Questions from MR THOMAS
 13 MR THOMAS: G1, a few questions if I may. Can I just come
 14 to your vehicle, the delta vehicle. Was that vehicle
 15 fitted with a siren and blue flashing lights.
 16 **A. It would have been, yes.**
 17 Q. Okay. In fact, as I understand it, all the vehicles
 18 were, that is the alpha, bravo, charlie and your car?
 19 **A. Yes, that's correct.**
 20 Q. As far as, just sticking with your car, when you came
 21 in, I know that you came in afterwards, after the strike
 22 had been called, were you -- if I use the expression
 23 blues and twos you understand what I mean?
 24 **A. Yes.**
 25 Q. Were they activated?

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1 **A. I don't think they were, to be honest.**
 2 Q. Secondly, you had access to the radio channel and you
 3 could hear some instructions from X7, correct?
 4 **A. That's correct.**
 5 Q. Was there any discussion about a plan?
 6 **A. In what respect?**
 7 Q. Well --
 8 **A. Who was going to go where or --**
 9 Q. Any plan?
 10 **A. I don't think there was as such.**
 11 Q. To be clear, you were listening to the radio channel,
 12 weren't you?
 13 **A. I was monitoring that radio channel and the surveillance**
 14 **unit channel as well.**
 15 Q. Because that is what you would be doing?
 16 **A. That's correct.**
 17 Q. Thank you.
 18 Thirdly, in relation to the bang you heard, yes?
 19 **A. Yes.**
 20 Q. You have given an indication as to where you were when
 21 you heard that bang and again you have given
 22 an indication that it would have taken you between 15 to
 23 25 seconds to get into the Jackson Avenue car park?
 24 **A. Yes.**
 25 Q. You hear a bang and then it is 15 to 25 seconds to get

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<p>1 into the car park. Question: in that passage of time 2 from the bang that you heard until you get into the car 3 park, do you hear any other bangs? 4 A. I don't recall any others; the bang I heard may well 5 have been the last bang. 6 Q. Yes. 7 Just assist the chairman with this. Are you able to 8 discern whether the gunshot that you heard, the bang 9 that you heard, was from a shotgun or from an MP5 or are 10 you unable to say? 11 A. In my experience, the -- if you hear the two together, 12 you can tell them apart. If you hear one on its own, 13 I would probably hazard a guess that I could give you 14 a reasonable guess as to which one it was. I only heard 15 the one, the others may have been going off as I was 16 exiting the vehicle and I have either not noticed them 17 or because I have still been within the vehicle -- 18 Q. What do you believe it was? 19 A. I believe it was possibly the shotgun. 20 Q. Okay. 21 As you say, you think it is probably the last one, 22 as -- because you don't hear anything else? 23 A. Don't hear anything else, no, and ... 24 Q. Okay. 25 THE CHAIRMAN: Were you going to add something?</p> <p style="text-align: center;">Page 101</p>	<p>1 whether V53, this is the Mark Duggan firearms officer, 2 attended the day before you did your detailed account. 3 You said you don't recall. You remember Ms Cartwright 4 putting it to you, "Well, you know, this would be quite 5 memorable, this would be quite a memorable event", and 6 your response was, "I don't recall". 7 Can I ask you this, you have been following the 8 transcripts in this Inquiry, is that right? You have 9 looked at the transcripts? 10 A. I have looked at some of the transcripts. 11 Q. Right. You see, I am going to suggest a curious thing 12 has happened. Initially the firearms officers who stood 13 where you are standing, right, the first batch of them 14 who came in all remember V53 coming down but they 15 couldn't remember what was discussed and suddenly, the 16 firearms officers who are standing where you are 17 suddenly don't have a recollection -- just can't 18 remember one way or the other. Is that a line that the 19 firearms officers are now taking, "Best to say we just 20 don't remember"? 21 A. No, I just don't remember. 22 Q. Well, again, I am just going to probe this just a little 23 bit more. 24 I can understand, G1, if you said no, this is 25 an officer I would remember, it didn't happen but you</p> <p style="text-align: center;">Page 103</p>
<p>1 A. And, if I had have heard the MP5, and then subsequently 2 the shotgun, I would have been able to have said I heard 3 one go off which was of a different noise signature and 4 then heard a second one. 5 MR THOMAS: Very well. 6 Final topic, the post-incident procedure, okay. 7 Nobody instructed you not to do a first account on 8 the night, did they? 9 A. I don't recall. 10 Q. Can I just probe that. You have been a police officer, 11 at the time of this incident, for a number of years, you 12 were one the senior officers there in terms of length of 13 service, correct? 14 A. Correct. 15 Q. You know the importance of an initial account, even 16 though it is not your detailed account. That would be 17 right, isn't it? 18 A. That's correct. 19 Q. Yes. 20 If somebody were to instruct you not to do 21 an initial account, that would be going against the 22 norm, it would be memorable? 23 A. I just don't recall. 24 Q. Well, okay, let me move on. Still on the post-incident 25 procedure, one question that Ms Cartwright asked you was</p> <p style="text-align: center;">Page 102</p>	<p>1 are saying you have no recollection whatsoever. Is that 2 what you are saying? 3 A. I have no recollection of V53. 4 Q. Well, an officer coming down to discuss -- this was your 5 first fatality, is it, from a police officer shooting 6 somebody, is that right? Or have you been involved in 7 another one? 8 A. I have been involved in other post-incident procedures, 9 but I think this is my first fatality. 10 Q. Right, so this is the first time on an operation that 11 you have been on that a member of the public has been 12 shot dead, correct? 13 A. Correct. 14 Q. All right. That in itself would make this memorable, 15 would you agree? 16 A. I just have no recollection of V53. He may have come, 17 he may have spoke to me, spoke to us as a collective. 18 I have no recollection of it or who he was. 19 Q. Why is it, I am moving on now, why is it -- bearing in 20 mind the importance of getting your account down 21 relatively quickly you are given a 48-hour rest period, 22 I accept that, but it took you six days? 23 A. That was on advisement. 24 Q. Somebody instructed you not to do your account until, 25 and told you when to start it, is that what you are</p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

1 saying?

2 **A. Someone said, we went to Nexus House and we did them in**

3 **the company of the solicitor.**

4 MR THOMAS: Sir, that is all I ask.

5 THE CHAIRMAN: Thank you, Mr Thomas.

6 Mr Weatherby.

7 Questions from MR WEATHERBY

8 MR WEATHERBY: Yes. Just picking up on that, that was under

9 advisement I think you just said?

10 **A. I think so, as I recall it.**

11 Q. You cannot remember on the night being told not to make

12 an account?

13 **A. I don't recall on the night.**

14 Q. You don't recall one way or the other, but you think

15 that at some point you were advised not to make

16 an account until six days later?

17 **A. Whether we were advised to do it, whether we were**

18 **advised six days later or whether we were told we are**

19 **going to do them on a specific day in the company of**

20 **a solicitor, I can't remember.**

21 Q. Right, but I am not going to labour the point about the

22 night, you have been asked about that. You then have

23 this cooling down period or period of consideration, but

24 then the days roll by and you are getting more and more

25 remote from the facts, aren't you? Six days is an awful

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1 long time after an incident, isn't it, to make your

2 first written account?

3 **A. It is a time afterwards.**

4 Q. Yes, so during that period, from say 48 hours afterwards

5 to six days afterwards, what were you thinking?

6 **A. In fairness, I, along with other officers, I think we**

7 **were quite keen to write our statements.**

8 Q. You get to say day 3 or day 4, it doesn't particularly

9 matter, so that sort of period, after the cooling off

10 period, and you want to make an account?

11 **A. Again, I just can't recall how it came about to be,**

12 **whether it was under advisement, whether it was the IPCC**

13 **failing to come and take a statement off us, but the**

14 **decision was made that we would do them at Nexus House.**

15 Q. Yes, I follow that six days later somebody in

16 supervision, somebody, says that there is going to be

17 a meeting to take statements. Is that right?

18 **A. That's correct, we were told that was when we would do**

19 **it.**

20 Q. Between the cooling off period and that six days,

21 I understood your evidence was that you were keen to

22 give an account?

23 No? Do I have that wrong?

24 **A. Yes.**

25 Q. You were keen to give an account?

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1 **A. Yes.**

2 Q. Why didn't you get your pocket notebook out or

3 a statement form out and write down your first account?

4 **A. Again, I don't recall why.**

5 Q. Going to, just for a moment, just before the actual

6 incident on the 3rd, you were parked up in Church Lane,

7 just near to where the incident occurred, yes?

8 **A. Yes.**

9 Q. Can I just clarify with you, was it your decision to

10 deploy, or to try to deploy on to the back of the

11 convoy?

12 **A. When the convoy were moving through?**

13 Q. Yes.

14 **A. I would assume as the team leader it would have been my**

15 **decision to do that, but that would always be the case**

16 **where once the decision is made, that the foot strike is**

17 **now no longer an option and that the vehicle strike is**

18 **going to go ahead. We would always then seek to move**

19 **back on to the back of the vehicle strike and support**

20 **our colleagues.**

21 Q. Yes, sure.

22 You see the convoy passing before your eyes, don't

23 you, the three cars?

24 **A. Yes.**

25 Q. Were you expecting to see that?

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1 **A. We were looking for them.**

2 Q. You were looking for them. At that point had Red been

3 called?

4 **A. I don't think Red had been called at that point.**

5 **I think they were possibly still on Amber, still making**

6 **ground.**

7 Q. Right, but somehow you knew they were making towards

8 Jackson Avenue?

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

10 Q. Okay. But your decision, not anybody else's, to deploy

11 on to the back of the convoy?

12 **A. Well, we wouldn't go anywhere else, our position is on**

13 **the back of the convoy. We wouldn't pull in front of**

14 **it.**

15 Q. Yes.

16 Finally, can I just go back to a question you were

17 asked by Ms Cartwright. It is tab 4, your 2016

18 statement. It is back to paragraph 26, please. Do you

19 have that?

20 **A. Yes.**

21 Q. Here, in December just gone, you are asked about the way

22 that a live operation happens, and you talk about the

23 general rule of thumb and how where an officer was sat

24 in the vehicle gave them a guide to what they would do.

25 Is that a fair way of paraphrasing that?

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1 **A. Again, I think that is down to my poor description at**
 2 **the time, to the officer I have dictated the statement**
 3 **to.**
 4 Q. Right, okay, so we have heard some evidence about
 5 greater flexibility during the course of this Inquiry.
 6 **A. Yes.**
 7 Q. Yes? And you are aware of that?
 8 **A. Yes.**
 9 Q. Because presumably you followed on the transcripts, yes?
 10 **A. Well, I am aware of it because it is what is in place.**
 11 Q. Right, so can you help us why in December you didn't
 12 explain that it used to be that individual officers had
 13 set objectives but actually they don't?
 14 **A. I think what I was trying to say was the objective is**
 15 **the vehicle and the routes that officers are exiting the**
 16 **nearest door and down that side of the vehicle.**
 17 Q. Right, is the reality that it used to be more rigid but
 18 it got more flexible over time?
 19 **A. A number of years ago it was more rigid, yes.**
 20 Q. Yes. It is not the case that it is a free for all, is
 21 it --
 22 **A. Certainly not.**
 23 Q. -- I mean GMP's policy here is not: drive cars at
 24 a subject vehicle and everyone jump out and run at the
 25 subject car?

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1 **A. No, that is not the policy.**
 2 Q. The basic method of a strike hasn't really changed, has
 3 it?
 4 Let me explain, before you answer that, let me put
 5 to you what I mean and then you can agree or not.
 6 The basic methodology of this sort of vehicle strike
 7 is surprise, it is a covert operation, yes?
 8 **A. Yes.**
 9 Q. Followed by overpowering the subjects using the
 10 surprise. Containing them and extracting them?
 11 **A. If that was the tactic on the day, yes.**
 12 Q. Yes, well that is the GMP approach -- no doubt others'
 13 as well, but the GMP approach to vehicle strikes?
 14 **A. There are various lesser degree tactics within that.**
 15 Q. Yes, but on the day that is what the policy was, that is
 16 what the method was, yes?
 17 **A. Was what, sorry?**
 18 Q. That is what the method was?
 19 **A. Which was what?**
 20 Q. Well, surprise, overpowering, containing, extraction?
 21 **A. That's correct.**
 22 Q. Yes.
 23 Although there was a greater flexibility, officers
 24 should have had some planning, some plan, some command,
 25 yes?

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1 **A. They did have plan and command.**
 2 Q. Yes. The greater flexibility that evolved with the GMP
 3 method put more onus on the planning from the OFC; is
 4 that fair?
 5 **A. The flexibility allows for the officers to use their**
 6 **discretion and work out where the hierarchical threats**
 7 **are as they approach that vehicle and approach those**
 8 **threats as they see best.**
 9 Q. Yes. You go from a position back in the day when there
 10 is a more rigid training of GMP officers, which involves
 11 specific roles, yes?
 12 **A. Yes.**
 13 Q. Over time that evolved to greater flexibility?
 14 **A. Yes.**
 15 Q. Would you agree that that greater flexibility put
 16 a greater onus on the command on the ground in order to
 17 commanding those officers?
 18 **A. On the OFC?**
 19 Q. Yes.
 20 **A. I would say that the officers approaching those vehicles**
 21 **still have to decide where their hierarchical order of**
 22 **threat is.**
 23 Q. Yes, I am not quibbling about that, but a greater onus
 24 on the command on the ground. The greater the
 25 flexibility of the policy, the greater onus on the

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1 commander, yes?
 2 **A. Sorry, I don't understand the point you are trying to**
 3 **make there, sir.**
 4 **MR WEATHERBY: I won't take it any further.**
 5 THE CHAIRMAN: Ms Collins?
 6 MS COLLINS: No thank you, sir.
 7 Questions from MS WHYTE
 8 MS WHYTE: You cannot see me, G1. My name is Anne Whyte, as
 9 you know, and I am asking questions on behalf of the
 10 Greater Manchester Police.
 11 Four short points please.
 12 You have been asked about the deployment on
 13 3 February 2012 and the pre-settled contingency, one of
 14 a number, that if there was loss on the subjects,
 15 consideration would be given to using marked vehicles if
 16 appropriate. Do you remember that, Ms Cartwright asked
 17 you about it?
 18 **A. Yes.**
 19 Q. "Consideration would be given, if appropriate then
 20 deployed."
 21 That is the wording in the briefing, correct?
 22 **A. Yes.**
 23 Q. Would the consideration and the appropriateness of
 24 resorting to that as a contingency depend upon whether
 25 the entire vehicle had been lost to the sight of

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1 surveillance officers or whether, for example, one
 2 subject or two subjects had been lost because they had
 3 got out and were on foot?
 4 **A. That would be a decision really for the TFC and the SIO**
 5 **to decide on the -- actually whilst the operation was**
 6 **running.**
 7 Q. Yes.
 8 **A. Whether -- because there could be all manner of reasons**
 9 **why two had been lost sight of from the vehicle.**
 10 Q. Yes.
 11 **A. But, again, I would say that that would be based on**
 12 **other information that they had at the time, they would**
 13 **make that decision.**
 14 Q. Any number of variables before you even get to thinking
 15 about whether some sort of overt disruptive presence
 16 would be required and if so how quickly?
 17 **A. Again, yes, but that is a decision for the TFC and the**
 18 **SIO.**
 19 Q. Sure.
 20 If the entire subject vehicle had been lost to the
 21 sight of surveillance officers, so loss of sight on the
 22 vehicle, they hadn't got a clue where it is, whether it
 23 sped away at 80 miles an hour or whether it is lurking
 24 in a layby unbeknownst to you 100 metres away, how would
 25 you know as a TFC or an OFC where to deploy the overt

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1 disruptive police vehicle?
 2 **A. That would be all based on the information and the**
 3 **intelligence that they had where they thought that the**
 4 **intended victim was or intended target was.**
 5 Q. Yes. And it might depend on whether the suspicion was
 6 that it was purely a cash in transit van that was being
 7 targeted or any number of other premises?
 8 **A. That's correct.**
 9 Q. It would also depend, wouldn't it, on whether the loss
 10 of sight had occurred before the strike was called or
 11 after?
 12 **A. It would. Yes, that's correct.**
 13 Q. Did you actually, once you reached the car park where
 14 the incident occurred, see any members of the public on
 15 the car park?
 16 **A. I don't recall seeing any. I remember passing people on**
 17 **the road, passing people on the grass verge, numbers**
 18 **I couldn't tell you. At that point then I am focused on**
 19 **the red Audi and moving to assist my colleagues.**
 20 Q. You saw people when you were on the Common Lane end of
 21 business. Once you were over onto the car park, where
 22 the red Audi was, you don't recall seeing members of the
 23 public? Is that a fair summary?
 24 **A. I would say that they were likely to have been there.**
 25 **It was a Saturday night, it was a busy car park --**

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1 Q. Yes.
 2 **A. -- clearly there was a lot of traffic in Culcheth,**
 3 **because we had been held up on the way in.**
 4 Q. Yes.
 5 **A. However, whilst I am approaching the wrong car park, if**
 6 **we put it that way, I am scanning to try and locate my**
 7 **colleagues and the subject vehicle. Once we have**
 8 **located the correct car park, I have now focused on my**
 9 **colleagues and the haste in which I need to get there.**
 10 Q. Thank you.
 11 Then two very brief matters.
 12 Are you able to recall whether the loggerhead, as
 13 you perceived it to be, about how the firearms officers'
 14 evidence ought to be taken was one between the IPCC and
 15 supervision or whether it was one between the IPCC and
 16 union or feds reps? Or can you not recall?
 17 **A. I don't recall, to be honest.**
 18 Q. Can you recall whether by 8 March, the meeting that you
 19 have been asked about, there was a settled view that
 20 officers would not be providing interview or recorded
 21 statements?
 22 **A. Again, I don't recall the outcome of that. I just**
 23 **remember being told we are going to Nexus House to**
 24 **provide statements.**
 25 Q. Thank you.

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1 Finally, you have been asked by Mr Weatherby about
 2 the changing dynamics of the MASTS platform and how it
 3 became more flexible. I just want to put some
 4 chronological flesh on those bones.
 5 It is right, isn't it, that that change was trained
 6 out to officers in or around the early summer of 2010
 7 when you all attended conversion courses?
 8 **A. Yes, that's correct.**
 9 Q. So from 2010, indeed May, that is the way you performed
 10 a MASTS vehicle strike?
 11 **A. Yes.**
 12 Q. By being flexible, particularly in relation to, for
 13 example, the charlie and delta vehicles and in
 14 particular to filling in and finding work behind the
 15 alpha and bravo?
 16 **A. That's correct.**
 17 Q. Yes.
 18 That was training that you had had repeatedly and
 19 with which you were fully familiar?
 20 **A. Yes.**
 21 MS WHYTE: Thank you very much.
 22 Thank you, sir.
 23 MS CARTWRIGHT: Sir, just two matters. One arising from a
 24 question of Mr Weatherby, the other I just want to ask
 25 for completeness, but it is an area I didn't cover, so

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<p>1 if it raises any issues for you or the core 2 participants. 3 Further questions from MS CARTWRIGHT 4 MS CARTWRIGHT: G1, just in answer to the question from 5 Mr Weatherby where Mr Weatherby was putting to you about 6 the tactic of essentially overpowering the subject, 7 containing them and extracting them. You indicated in 8 response that there were various lesser degree tactics 9 that could be used, in answer to the question. 10 Could you assist as to what you meant by "various 11 lesser degree tactics"? 12 A. We do a contain and call out, where again we will 13 position the vehicles on to the subject vehicle, contain 14 it and call the occupants out. 15 Q. Yes. 16 A. Then, as we say there, we have an enforced stop and an 17 extraction. 18 Q. In terms of one of the various lesser degree tactics is 19 a contained call out, box the vehicle in and then call 20 for the occupants to come out of the vehicle when it is 21 under control essentially? 22 A. That's correct. 23 Q. Was that the only one you were referencing by way of the 24 various lesser degree tactics or is there anything else? 25 A. That is the one I was referencing.</p> <p style="text-align: center;">Page 117</p>	<p>1 Q. You would assume from it being briefed as intelligence 2 that it was an armed robbery team that they would be 3 armed with a -- 4 A. Armed. 5 Q. Again going back to the questions I asked earlier, that 6 is armed with a weapon, not necessarily a firearm? 7 A. Armed with firearms, a weapon or otherwise so dangerous. 8 MS CARTWRIGHT: Sir, I am not going to take the matter 9 further. 10 Unless there is anything further you wish to 11 address. 12 Questions from THE CHAIRMAN 13 THE CHAIRMAN: There is one matter, I just want to make sure 14 I have correctly understood something you said in answer 15 to Mr Weatherby. I think you said something to this 16 effect, that once you were told a foot strike was no 17 longer an option and it was now going to be a vehicle 18 strike, normal practice would be for you to attach 19 yourselves in delta vehicle to the back of the convoy. 20 Do I have that right, that that's what you said? 21 A. Yes, sir. 22 THE CHAIRMAN: Because that is your position, that is what 23 you are there for. 24 By "foot strike", do you mean -- does that refer to 25 in the case of subjects in the vehicle, letting them get</p> <p style="text-align: center;">Page 119</p>
<p>1 Q. Then, I apologise, one question I omitted to ask you 2 when I asked you my questions earlier. 3 We know that in the briefing on 3 March, Mr Granby 4 and X7 gave no assessment as to whether the subjects 5 would be carrying firearms with them on that day. 6 I just want to ask, was it normal in your experience 7 for a TFC and an OFC to give some form of assessment as 8 to the likelihood that subjects may have firearms with 9 them? 10 A. Was that not included in the briefing? 11 Q. Not on 3 March, no. 12 A. Right. The -- they would have given an assessment based 13 on the information they had. 14 Q. Yes. But in terms of, if there is a briefing where no 15 assessment is given by the TFC or the OFC, as to whether 16 the likelihood of subjects having firearms with them, 17 what would you take that to indicate? 18 A. Sorry, say that again? 19 THE CHAIRMAN: If nobody said anything at all about it one 20 way or the other, what would you then assume? 21 Is that right? 22 MS CARTWRIGHT: It is, thank you, sir. 23 A. I would assume that they are an armed robbery team, they 24 would be armed with firearms or other weapons or 25 otherwise so dangerous.</p> <p style="text-align: center;">Page 118</p>	<p>1 out of the vehicle and then doing the strike, as opposed 2 to striking on the vehicle itself? 3 A. No, that means striking on the occupants of the vehicle 4 whilst they were out on foot, somewhere else away from 5 that vehicle. 6 THE CHAIRMAN: Right, but it means striking on them whilst 7 they are outside the vehicle? 8 A. That's correct. 9 THE CHAIRMAN: Right. Had you been expecting a foot strike? 10 Had that been a preferred option, in other words to let 11 them get out of the vehicle and let them strike, or not 12 that day? 13 A. It is a MASTS operation, sir, and there is a degree of 14 flexibility. We have left that briefing that morning, 15 we could have done any number of options, building, 16 a vehicle or foot. We have been moved from the 17 Raven Inn to a nearer point closer to Culcheth, or 18 closer to Jackson Avenue in preparation for any foot 19 interventions that needed making. 20 So I wasn't -- I can't say I was honestly expecting 21 it, but it wouldn't have come as a huge surprise if we 22 had done one. 23 THE CHAIRMAN: Your position, being somewhat separated from 24 the convoy, would be in case there had to be a foot 25 strike. Is that right?</p> <p style="text-align: center;">Page 120</p>

<p>1 A. That's correct. 2 THE CHAIRMAN: I follow, it may just be me being a bit slow 3 on the uptake, you may have said that earlier. 4 Thank you. 5 Does anybody want to ask anything arising out of 6 that? 7 MS CARTWRIGHT: No thank you, sir. 8 THE CHAIRMAN: That being so that is the end of your 9 evidence. Thank you very much, the Inquiry is very 10 grateful to you for assisting the business of the 11 Inquiry, G1. 12 You are now free to go. 13 A. Thank you, sir. 14 THE CHAIRMAN: Thank you very much. 15 MS CARTWRIGHT: Sir, after the luncheon adjournment we are 16 going to move to Mr Higgins. I am not proposing to move 17 from here, notwithstanding -- 18 THE CHAIRMAN: He doesn't have the benefit of a screen, but 19 you will be going back to a witness who does afterwards. 20 It makes sense for to you stay where you are. 21 MS CARTWRIGHT: Thank you. Sir, we are making good progress 22 and certainly I don't envisage that the afternoon 23 session will be any longer than the morning session if 24 that assists. 25 THE CHAIRMAN: It does help. Thank you very much.</p> <p style="text-align: center;">Page 121</p>	<p>1 Q. If we could then please move behind tab 2, and we see 2 your brief statement of 28 May 2012. 3 A. Yes. 4 Q. Moving then, please, behind tab 3, we see your third 5 statement, dated 30 July 2014. 6 A. Yes. 7 Q. Mr Higgins, can I ask you to confirm are the contents of 8 those witness statements true to the best of your 9 knowledge and belief? 10 A. Yes, they are. 11 Q. Mr Higgins, before taking you through the detail of your 12 9 March account. Can I just get some background 13 information from you please. Could you assist first of 14 all as to when you became a police officer, please? 15 A. I became a police officer in November 1996. 16 Q. In March 2012, what rank were you in? 17 A. I was a Police Constable working at the Tactical 18 Firearms Unit. 19 Q. Thank you. Are you still serving? 20 A. Yes, I am still a serving police officer. 21 Q. As a Police Constable? 22 A. Yes, I am. 23 Q. Thank you. 24 Can you assist when you became an AFO, please? 25 A. That would have been the end of 2003.</p> <p style="text-align: center;">Page 123</p>
<p>1 I think we can say 2.10 -- 2 MS CARTWRIGHT: Thank you, sir. 3 THE CHAIRMAN: -- in those circumstances. 4 Thank you. 5 (1.05 pm) 6 (The Luncheon Adjournment) 7 (2.11 pm) 8 THE CHAIRMAN: Yes, Ms Cartwright. 9 MS CARTWRIGHT: Good afternoon. Philip Higgins, please. 10 MR PHILIP HIGGINS (sworn) 11 THE CHAIRMAN: Do sit down, Mr Higgins. 12 A. I would prefer to stand if you don't mind, sir. 13 THE CHAIRMAN: Up to you entirely. 14 Questions from MS CARTWRIGHT 15 MS CARTWRIGHT: Good afternoon, Mr Higgins. My name is 16 Sophie Cartwright and I ask questions on behalf of the 17 Inquiry. Mr Higgins, there is a cypher key next to you 18 on your left-hand side, please when referring to any of 19 the officers if you could refer to them by their cypher. 20 In addition, in front of you there should be a bundle 21 where we find your witness statements. 22 Could I ask you, first of all, please, to turn 23 behind tab 1. Where we see your witness statement dated 24 9 March 2012. 25 A. Yes.</p> <p style="text-align: center;">Page 122</p>	<p>1 Q. Thank you. When you became an SFO? 2 A. The SFO would have been, if I get my dates right, it 3 would have been 2009 -- 2009, March 2009. 4 Q. Thank you. 5 Can you assist were you also in March 2012 a CTSFO? 6 A. I hadn't got to that stage; I was in the process of 7 becoming a CTSFO. 8 Q. Thank you. 9 Were you trained in March 2012 in MASTS operations? 10 A. Yes, I was. 11 Q. When had you first become qualified to participate in 12 a MASTS operation? 13 A. That would more than likely have been about 2007, as 14 memory serves me. 15 Q. Thank you. 16 Can you assist as to how many MASTS deployments you 17 had been involved in prior to March 2012? 18 A. Actual briefings for MASTS deployment, I am talking 19 about probably about 100 or 100 plus. 20 Q. Ones in which decisive action had been taken? 21 A. I would say between the 20 and 30 mark where we have 22 intercepted. 23 Q. Similarly, had you been involved in those where special 24 munitions had been deployed? 25 A. Yes, I have.</p> <p style="text-align: center;">Page 124</p>

1 Q. What special munitions?
 2 **A. The use of the tactical shotgun with the RIP round, the**
 3 **RAM round and the Hatton round and the use of the CS**
 4 **dispersal canister.**
 5 Q. Thank you, and were you qualified to use special
 6 munitions?
 7 **A. Yes, I was.**
 8 Q. Thank you.
 9 Finally by way of background and experience,
 10 by March 2012 did you consider yourself to be
 11 occupationally and operationally competent as an SFO
 12 participating in a MASTS operation?
 13 **A. Yes, I did.**
 14 Q. Thank you.
 15 If I can then ask you, we can see from your witness
 16 statement that prior to 3 March 2012, I think you had
 17 only ever previously been involved in a briefing on
 18 8 December 2011?
 19 **A. Yes. I can't quite remember what it was with that**
 20 **Op Shire briefing, because I think it was different**
 21 **subjects.**
 22 Q. Yes, I think at that time it would have related to the
 23 Corkovics.
 24 **A. Yes.**
 25 Q. Can I ask you then, in terms of the Operation Shire

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1 nominals as at the briefing of 3 March 2012, did you
 2 have any prior knowledge in respect of Anthony Grainger?
 3 **A. No.**
 4 Q. Mr Rimmer?
 5 **A. No.**
 6 Q. And Mr Totton?
 7 **A. Yes.**
 8 Q. What was your prior experience of Mr Totton?
 9 **A. For Mr Totton it would be the Brass Handles shooting.**
 10 Q. Yes.
 11 **A. In relation -- sort of the aftermath of that shooting.**
 12 **I do believe that it was one of the -- the other**
 13 **names that came up on a previous MASTS deployment, but**
 14 **we never actually went out, we were warned that we may**
 15 **be doing an operation on Totton. His name was**
 16 **frequented in the sort of circle of armed criminality.**
 17 Q. Can I ask, in terms of you referencing the shooting in
 18 the Brass Handles I think where Mr Totton had been shot
 19 at?
 20 **A. Yes.**
 21 Q. Were you involved in that by way of investigation or was
 22 it just something you were aware of from sort of general
 23 knowledge?
 24 **A. It was prior to being a SFO, I was on the armed response**
 25 **vehicles. And at the time there was a particular**

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1 **tension between the gang members of south Manchester,**
 2 **who had orchestrated the shooting of Mr Totton.**
 3 Q. Yes.
 4 **A. So by way of virtue of stopping these said individuals,**
 5 **they would be linked in that way, it would be stopping**
 6 **to see if they were still in that sphere of trying to do**
 7 **any more criminality.**
 8 Q. Can I ask, in terms of the previous knowledge or the
 9 prior knowledge you had about Mr Totton before attending
 10 the briefing on 3 March 2012, did you share any of that
 11 information or intelligence you had with any other of
 12 the AFOs on 3 March 2012?
 13 **A. No.**
 14 Q. I am just going to please now briefly take you to the
 15 briefing for 3 March 2012, just to seek your
 16 understanding of some of the matters that were raised in
 17 the briefing on 3 March.
 18 There should be a bundle, please, Mr Higgins, called
 19 the general firearms officers' bundle. I want to take
 20 you, please, in file 2, behind tab 22, please.
 21 Could I ask you, please, to turn to page 1267. It
 22 is the page that has the heading "Information and
 23 intelligence". We can see as part of the briefing it
 24 was set out that, "The subjects of this operation are
 25 believed to be engaged in armed robberies in the

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1 north-west region", and similarly the phrase "armed
 2 robberies" is repeated in respect of each of the
 3 nominals for their intent being, "Conspiracy to commit
 4 armed robbery".
 5 What was your understanding as to what an "armed
 6 robbery" meant or involved?
 7 **A. Primarily using either a firearm or other instruments,**
 8 **bladed instruments, machetes, coshes, anything to**
 9 **inflict pain or damage to someone to coerce them into**
 10 **releasing money.**
 11 Q. Thank you. Then staying on that page, please, we can
 12 see that as part of the briefing intelligence was
 13 provided relating to a robbery in 2008 in Preston. We
 14 can see that the briefing PowerPoint sets out, "There is
 15 intelligence to suggest that these subjects were
 16 responsible for the robbery in 2008 ..." And similarly
 17 again a little further on, reference to, "... the
 18 subjects making good their escape with a substantial
 19 amount of money".
 20 By reference to "these subjects", did you take that
 21 intelligence to relate to David Totton, Robert Rimmer
 22 and Mr Grainger?
 23 **A. Yes. In entirety, yes, that's correct.**
 24 Q. Thank you. Can we turn over the page then, where we see
 25 the threat assessments that were provided for each of

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<p>1 the nominals. We can see under "Capability", warnings, 2 so we can see the warnings at page 1268 for Mr Totton 3 and then similarly warnings for Robert Rimmer and 4 Mr Grainger. What was your understanding about warnings 5 and what warnings indicated, please?</p> <p>6 A. Warnings would be either on the police national computer 7 or GMP's OPUS system, so you would have two ways of 8 collecting that information. So they would be indicated 9 of that, so with the information there it would either 10 be conviction led or intelligence led, where they have 11 put them warnings on.</p> <p>12 Q. In terms of how you would treat a warning when it was 13 referenced in a briefing.</p> <p>14 A. I would treat it that it has only been put on for the 15 correct reasons and it was current and up to date.</p> <p>16 Q. Thank you.</p> <p>17 We are aware that on 3 March, I think you were 18 delta 2.</p> <p>19 A. Yes.</p> <p>20 Q. Within the delta vehicle you sat behind G1, who was in 21 the front passenger vehicle?</p> <p>22 A. Yes.</p> <p>23 Q. Sorry, "Front passenger seat", I should say.</p> <p>24 I want to now take you through your 9 March 25 statement to go through the events of that day, please,</p> <p style="text-align: center;">Page 129</p>	<p>1 deployment vehicles. So I think I received the phone 2 call about 2100 hours.</p> <p>3 THE CHAIRMAN: Sorry, you said it was, do you mean it was 4 from recollection?</p> <p>5 A. Yes.</p> <p>6 THE CHAIRMAN: Not from the flip chart?</p> <p>7 A. Sorry, yes, it was, because obviously I received the 8 phone call at that time of night, I then said, "Well, it 9 is time I need to go to bed now then".</p> <p>10 Sorry, sir.</p> <p>11 THE CHAIRMAN: It is all right, I just wanted to make sure 12 I correctly understood it, that is all.</p> <p>13 MS CARTWRIGHT: We can see that, leaving aside the 14 8 December which then didn't turn out to be the full 15 deployment, this is the first occasion you were involved 16 in Operation Shire in terms of a deployment. Were you 17 I think we have -- there is documentation I think the 18 reference to different teams within the TFU. Were you 19 ordinarily part of this team of firearms officers or 20 were you being called in from a different team?</p> <p>21 A. You mean in respect of being -- as the ops team?</p> <p>22 Q. Yes.</p> <p>23 A. I was part of the ops team, but I had recently completed 24 my national firearms instructors' course and part of the 25 accreditation is to teach on an initial course, to see</p> <p style="text-align: center;">Page 131</p>
<p>1 Mr Higgins. You should also have, just to the left of 2 you, I think three pages that are the flip chart that 3 the Inquiry has heard evidence in respect of that was 4 used as part of the meeting on 9 March and provided to 5 the firearms officers when they attended Nexus House to 6 provide a witness statement.</p> <p>7 A. Yes.</p> <p>8 Q. I draw that to your attention at this stage because you 9 will see within the PowerPoint various timings recorded 10 on that document and also details in respect of the 11 registration number, an incorrect registration number 12 for the red Audi.</p> <p>13 I am asking you about that now because we see in 14 your witness statement behind tab 1 that you have used 15 some of the information that we see on the flip chart 16 within your witness statement.</p> <p>17 I just want to confirm, please, you start your 18 witness statement with essentially parading on attending 19 at 04.30 on duty. In terms of that timing was that 20 something in your knowledge and recollection or were you 21 using the flip chart for that time?</p> <p>22 A. It was, because I was -- at the time I was seconded to 23 the firearms training unit. And I had worked the Friday 24 on a course and I received a phone call off J4 asking 25 was I available to fill a spot on one of the MASTS</p> <p style="text-align: center;">Page 130</p>	<p>1 if I was up to the required standard to do teaching. So 2 I had been seconded to the firearms training unit on the 3 back of that.</p> <p>4 Q. Okay.</p> <p>5 Thank you.</p> <p>6 Then if we just go back into your witness statement, 7 please, just to assist for clarification, staying on 169 8 we can see the registration number that is recorded 9 which is the same as that on the flip chart. Did you 10 get the information as to the registration number from 11 the flip chart?</p> <p>12 A. Yes.</p> <p>13 Q. Then, turning over the page in your witness statement, 14 please, you then reference 18.15, regarding the movement 15 of the subjects. A similar question, did you take that 16 timing from the flip chart or was that a time that you 17 had within your recollection?</p> <p>18 A. From the flip chart.</p> <p>19 Q. Were you aware as to the sources of the information on 20 the flip chart, who provided that information?</p> <p>21 A. It was written at Nexus House where we completed the 22 statements, and it was written up saying I think it had 23 been taken from log books and placed up on the flip 24 chart from there.</p> <p>25 Q. The Inquiry has heard some evidence, was it J4 that was</p> <p style="text-align: center;">Page 132</p>

1 recording the details on the flip chart?
 2 **A. Yes, it was.**
 3 Q. Thank you. Can we then please move through your witness
 4 statement, please, of 9 March 2012.
 5 You confirmed already that at 04.30 you attended at
 6 I think Openshaw for the purposes of a briefing that was
 7 going to take place later that morning.
 8 **A. Yes.**
 9 Q. Again, without seeking to ask you to identify where you
 10 live, can you assist as to what time you would have had
 11 to have woken up that morning to be at Openshaw for
 12 a 4.30 start of duty?
 13 **A. It would have been about 0345 hours.**
 14 Q. Thank you.
 15 You then set out there that the briefing commenced
 16 at approximately 06.00 hours and you have already
 17 confirmed that you were to take the D2 position, and you
 18 were armed with a Glock 17 SLP, X26 Taser and an MP5
 19 carbine.
 20 **A. That's correct.**
 21 Q. We have already touched upon the intelligence relating
 22 to the robbery in Preston, but your witness statement
 23 specifically references Totton, Rimmer and Grainger
 24 being suggested to be involved in the armed robbery in
 25 Preston in 2008.

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1 In terms of recording this information in your
 2 witness statement, again had you remembered this or did
 3 you have access to any material at the time of creating
 4 your witness statement?
 5 **A. That was from memory.**
 6 Q. Thank you.
 7 Your statement then goes on that after completion of
 8 the briefing you loaded your weapons and left in the
 9 delta vehicle in company with N7, G1 and V3 and
 10 proceeded to Leigh police station to await further
 11 instructions.
 12 **A. Yes.**
 13 Q. Can you assist the Inquiry as to what your understanding
 14 was as to the role that the delta vehicle was going to
 15 perform that day?
 16 **A. We usually -- the MASTS had three vehicles. It changed**
 17 **in its format but we were in the process of adapting**
 18 **that to come to the CTSFO level. So the delta vehicle**
 19 **was primarily for foot interception so they could be**
 20 **dropped off, do cut offs, do a foot follow, it added**
 21 **an extra string to your bow for anything that may change**
 22 **in the dynamics of the operation.**
 23 Q. Can you assist, we know that after the briefing that
 24 day, there was no rehearsal of the tactic, as was often
 25 practised after a briefing. Can you assist as to why

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1 there wasn't a rehearsal with alpha, bravo --
 2 **A. If memory serves me rightly, it was because of the**
 3 **previous instance which I asked, it was a question about**
 4 **we were not doing rehearsals, and I think it was down to**
 5 **the fact of the timings on the previous deployments the**
 6 **subjects had moved at early doors and they wanted to be**
 7 **in position to be ready to react in case they moved**
 8 **early doors.**
 9 Q. Can you assist as to who told you that on previous
 10 occasions the nominals had moved early doors?
 11 **A. I think it was a general conversation, because I had not**
 12 **been involved and not been on any other Shire**
 13 **deployments. It was:**
 14 **"Are we not doing a rehearsal?**
 15 **"No, they usually like to move early doors so we are**
 16 **going to go straight to the station."**
 17 **So it was more of a general question and answer, not**
 18 **just a wonder why.**
 19 Q. It seems, and if this is wrong please correct me, from
 20 you raising this, that you were perhaps even saying: are
 21 we going to do a rehearsal?
 22 **A. No, it was if we could fit it in, you know, we usually**
 23 **would, just to get the general feel of where people are,**
 24 **who, you know, who could be on your shoulder. It is**
 25 **just general familiarity of the people in positions.**

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1 **So it didn't happen all the time but I would say**
 2 **a majority, if there was time available we would just go**
 3 **through a walk through, talk through.**
 4 Q. Yes. It is your recollection that it was effectively
 5 being said that there wasn't time for a rehearsal?
 6 **A. Yes.**
 7 Q. I think then rather ironically you then spent the next
 8 eight hours at Leigh police station doing very little
 9 else?
 10 **A. Yes.**
 11 Q. Can I just confirm, I think you had set out that you
 12 arrived at Leigh police station at about 7.45 in the
 13 morning and you were on State Green at that stage?
 14 **A. Yes.**
 15 Q. Your witness statement suggests that I think you
 16 remained in the vehicle with your weapons on the floor
 17 of the car; is that correct?
 18 **A. Not in the vehicle all the time. What you are doing**
 19 **instead of going round the police station with your**
 20 **weapons hanging round you, it was you would place your**
 21 **weapons in a safe position in the vehicle. Someone**
 22 **would remain in the vehicle.**
 23 Q. Yes.
 24 **A. And then you would be able to relax in the refreshments**
 25 **room, not having to worry about your loaded weapon.**

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1 Q. Can I ask then, in terms of -- so there would have been
 2 part of the time when you would have been essentially on
 3 duty looking after the weapons in the delta vehicle, and
 4 then other times where you would be within Leigh police
 5 station?
 6 **A. Yes, and sometimes you may, if you were just walking
 7 round the car park, you may have your weapon with you so
 8 you knew where it was. It was as long as you knew your
 9 weapon was secure, that was the priority.**
 10 Q. Yes. Can I ask then, in terms of as the day progressed
 11 and certainly as we get around the 4.00 period and now
 12 you have been on duty around 12 hours or in excess of
 13 12 hours, was there any discussion of when this tour of
 14 duty was going to come to an end? To assist you who
 15 were essentially on standby but on standby with your
 16 weapons?
 17 **A. I don't think it was specific questions, it was more of,
 18 "I wonder how long this is going to go on because there
 19 has been no movement and is there going to be a cut-off
 20 point?"**
 21 So it was general chit-chat between the officers of
 22 the vehicles and just wondering then, asking I think it
 23 was X7, "Any updates?"
 24 "No, nothing."
 25 So it was just waiting to see if there was --

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1 **anything was going to change in the whole intelligence
 2 picture.**
 3 Q. Yes. Can I ask in terms of you saying there was general
 4 talk, essentially, as to is there going to be a cut off?
 5 Was there ever anything said about when there would
 6 be -- when the cut off would come?
 7 **A. If memory serves me right again, I think they -- it was
 8 decided at some time, about 18.00 hours, that the
 9 command would make a tactical decision whether or not to
 10 withdraw, as in that was sort of the time where we could
 11 look to sort of, when we were going to be stood down.**
 12 Q. Was that X7 that communicated that to you?
 13 **A. Yes.**
 14 Q. You set out in your witness statement that during the
 15 period you were at Leigh police station you were able to
 16 have breakfast, lunch, ample liquid refreshments and
 17 receiving regular intelligence updates from X7, the OFC.
 18 **A. Yes.**
 19 Q. Are you able to assist us at all with the recollection
 20 of any of those intelligence updates that X7 gave you
 21 throughout the course of the morning and the day?
 22 **A. It would be something as brief as:**
 23 "There is no change on the intelligence picture,
 24 nothing has happened here, there is nothing from the
 25 surveillance unit, just hold fast and wait further."

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1 **That was as much as the instructions and information
 2 we received.**
 3 Q. Thank you.
 4 Moving on then to the 18.15 hours, and thank you for
 5 confirming that that timing you would take from the flip
 6 chart. You set out in your witness statement that the
 7 picture changed regarding the movement of the subjects
 8 and all of the vehicles, alpha, bravo, charlie and
 9 delta, left Leigh police station and headed to Culcheth.
 10 **A. Yes.**
 11 Q. Can I ask, in terms of during the day, we know from the
 12 briefing that it was set out that the subjects had
 13 previously been to a specific car park at
 14 Jackson Avenue --
 15 **A. Yes.**
 16 Q. -- in Culcheth.
 17 Do you recall any discussion or checking of maps and
 18 plans for what was likely to be the deployment location?
 19 **A. Yes, I know in delta vehicle I certainly had a copy of
 20 the eight premises, which was highlighted in the
 21 briefing, and a map, because I wasn't au fait with the
 22 area, it was the first time I had been to Culcheth, so
 23 and because of my role, that had been allocated to me on
 24 the delta vehicle, I wanted to sort of make sure I knew
 25 what direction or what premises may be the subjects'**

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1 **target.**
 2 Q. In terms of the role within the delta vehicle as delta
 3 2, why does that have a special priority in terms of
 4 location?
 5 **A. Myself and V3 were giving -- we were going to be
 6 together at one jump off point from where we were going
 7 to be deployed from the delta vehicle and then it would
 8 have been N7 and G1 were then going to go further up,
 9 I think it is Common Lane, which is basically looking at
 10 north and south of Sainsbury's, if you looked, were
 11 looking straight above it.**
 12 Q. Thank you. Perhaps if we just look at that and the
 13 briefing PowerPoint, I think that you say you had in the
 14 delta vehicle, please. Again it is behind tab 22,
 15 so ...
 16 Perhaps if we turn to page 1281, which is the part
 17 of the PowerPoint that dealt with foot interception. If
 18 you turn over the page, please, we can see the aerial
 19 street map almost and I think you referenced a moment
 20 ago jump off point, is that to what you are referring?
 21 **A. Yes. So if you look at the map on 1282.**
 22 Q. Yes?
 23 **A. You will see a jump off point "PC Higgins and V3",
 24 I think it is quite a poor copy, but there is a star
 25 just to the left of Common Lane --**

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1 Q. Yes.
 2 **A. -- or in between the two, so that would cover sort of**
 3 **the south-east corner of Sainsbury's. And then G1 and**
 4 **N7 would drive round and they would deploy on the**
 5 **opposite corner, further up.**
 6 Q. I think what we see on this slide is what would have
 7 been the tactic if there had been a foot interception
 8 and so as to where the plan would be in the case of
 9 a foot interception as to where you and V3 would go?
 10 **A. We would maintain that area. It is more -- I think it**
 11 **was more of a containment because we would have alpha,**
 12 **bravo, charlie, would be driving to the scene.**
 13 Q. Yes.
 14 **A. I think it was more of a containment because if we had**
 15 **any runners that we could stop them going any further.**
 16 Q. We can see on this plan -- in the eventuality that
 17 a foot interception was needed, we can see indicated on
 18 the plan with A, B, C and D, the potential locations on
 19 this plan for where alpha, bravo, charlie and delta
 20 should locate themselves?
 21 **A. Yes.**
 22 Q. In terms of sort of preparing for the eventuality of
 23 this plan, you would have been familiarising yourself
 24 with the layout, the street layout?
 25 **A. Yes.**

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1 Q. Then, please, just staying behind tab 21, similarly if
 2 we move forward to page 1286, we can see a slightly
 3 larger Google Images map, looking down to again give
 4 further indication as to the layout of Culcheth and the
 5 location of the various premises?
 6 **A. Yes.**
 7 Q. Again, as part of your consideration of this PowerPoint,
 8 had you identified the car park on Jackson Avenue?
 9 **A. Yes.**
 10 Q. Thank you.
 11 Your witness statement going back behind tab 1,
 12 please, at page 170, sets out that whilst moving with
 13 the alpha, bravo and charlie, as you approach Culcheth,
 14 the information received over the radio was a red Audi
 15 was now mobile and en route and appeared to be heading
 16 in the direction of Culcheth.
 17 **A. Yes.**
 18 Q. Do you remember who was giving that update, was that X7?
 19 **A. No, that would have been -- we had our back-to-back**
 20 **channel for the MASTS, for the firearms officers, and we**
 21 **also had a surveillance unit radio.**
 22 Q. Thank you.
 23 Your statement goes on to deal with the lay up point
 24 then of the Raven Inn at Glazebury, which I think was
 25 just off Warrington Road. Do you recall who identified

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1 the Raven Inn as a place for alpha, bravo, charlie and
 2 delta to go?
 3 **A. No, I don't recall who advised to go there.**
 4 Q. Do you recall how long you were laid up on the car park
 5 at the Raven Inn?
 6 **A. It wasn't long, because we were then instructed to push**
 7 **forward as the delta vehicle.**
 8 Q. Thank you.
 9 Your statement sets out:
 10 "Further information was received via the personal
 11 radios that the red Audi was now in Culcheth village
 12 with three occupants on board."
 13 Just pausing there for a moment, prior to this time
 14 had it been communicated that there had been a loss of
 15 sight of the subjects?
 16 **A. Yes, there was the VSU -- the surveillance unit had**
 17 **picked up the red Audi and it was travelling from**
 18 **Boothtown and at some point between Boothtown and**
 19 **Culcheth they had lost sight of it, so they were doing**
 20 **their procedures to try and relocate the Audi.**
 21 Q. Can you recall over the radio how command, either X7 or
 22 Mr Granby, were responding to this loss of sight on the
 23 subjects?
 24 **A. I think it was a case of -- it would be more, I think it**
 25 **was X7 says, "Right, get ready, this might come on**

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1 **quickly because of the nature of the operation". So**
 2 **that geared us up then to start thinking where could**
 3 **they possibly go? What direction are they travelling**
 4 **in?**
 5 Q. Can I seek clarification, please. You indicate that it
 6 was communicated at this time specifically that it was
 7 said that there were three occupants on board and then
 8 the short time later further information was received
 9 that the vehicle was now parked up in the car park on
 10 Jackson Avenue near to Common Lane.
 11 Can you recall clearly if at that time you were told
 12 there were three occupants on board?
 13 **A. That would be from the surveillance unit channel. They**
 14 **had located the vehicle in the car park off**
 15 **Jackson Road.**
 16 Q. Are you sure that over the surveillance it was being
 17 said that there were three subjects on board?
 18 **A. I can't recall whether it was surveillance or X7 had**
 19 **reiterated that over the back-to-back channel.**
 20 Q. Can I just check that in respect of your recollection
 21 that three were on board, I just want to explore whether
 22 or not -- could you have been using information that you
 23 then gleaned after the incident to indicate that you
 24 knew there were three occupants on board?
 25 **A. No.**

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1 Q. You believe at the time you were told there were three
 2 on board?
 3 **A. Yes.**
 4 Q. You go on to set out that it had been indicated that the
 5 occupants were not visible and it was not clear if they
 6 had alighted from the vehicle?
 7 **A. Again, that was commentary from the surveillance unit.**
 8 **It was apparent from the radio transmissions that they**
 9 **were having difficulty getting the eyeball on the**
 10 **vehicle, and when they did, they couldn't -- the**
 11 **questions were being asked, could you, amongst**
 12 **themselves, can you actually see anyone in the vehicle?**
 13 **Because that would obviously have an impact on what we**
 14 **would have to do then.**
 15 Q. Yes. Your recollection is it was fed back that the
 16 occupants were not visible and it was not clear if they
 17 had left the vehicle?
 18 **A. Yes.**
 19 Q. In terms of then your recollection of events, it was
 20 a loss of sight of the subject vehicle, then
 21 an identification that the subjects had been identified
 22 again on board the Audi, but then a further period where
 23 it wasn't clear as to where the occupants of the Audi
 24 had gone?
 25 **A. That's correct.**

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1 Q. Your statement goes on that delta vehicle was instructed
 2 to drive ahead by X7 and find a suitable lay up point
 3 next to the Culcheth village centre as a contingency for
 4 a foot strike option.
 5 **A. Yes.**
 6 Q. Are you clear that when you were deployed, delta ahead
 7 of alpha, bravo and charlie, that it was for the
 8 potential for a foot strike option?
 9 **A. Yes.**
 10 Q. You set out that:
 11 "A suitable location on Church Lane, 150 metres from
 12 the junction with Warrington Road, was the location that
 13 was chosen to park delta vehicle."
 14 **A. Yes.**
 15 Q. Can you recall why Jackson Avenue wasn't used as the
 16 location to stop and wait with the delta vehicle?
 17 **A. I can't. I can only assume that it was because we were**
 18 **near a Sainsbury's, which was the main area of -- it was**
 19 **the centre of where the other premises were, so I can**
 20 **only guess that was why we were holding back from**
 21 **waiting.**
 22 Q. Can I just check, had you ever been to Culcheth before
 23 that time?
 24 **A. No.**
 25 Q. Can I ask, whilst you were sat in the delta vehicle on

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1 Church Lane, can you recall anything else that was being
 2 received by way of commentary over the radio?
 3 **A. It was mainly trying to glean information from the**
 4 **surveillance unit of what they were seeing, how they**
 5 **were painting the picture, trying to work out what were**
 6 **they seeing so we could visualise it ourselves.**
 7 Q. I think your statement -- and you have already addressed
 8 that essentially the last thing before you moved to the
 9 Church Lane was that it wasn't clear whether or not the
 10 subjects had alighted the vehicle.
 11 **A. Yes.**
 12 Q. I don't think you then deal with any confirmation over
 13 the radio as to the ongoing location of the occupants.
 14 Do you recall whether anything else was said during that
 15 period of time when you were at Church Lane or moving
 16 from Church Lane to Jackson Avenue as to any update
 17 relating to the occupants?
 18 **A. I do recall an update and that was when a surveillance**
 19 **officer got in a position to view the red Audi, and he**
 20 **stated he saw occupants in there and they appeared to be**
 21 **putting hats on their head/balaclavas.**
 22 Q. Okay, let me just pause there.
 23 Can you remember then, your recollection is that he
 24 had indicated there were occupants in the vehicle?
 25 **A. Yes.**

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1 Q. Were the number of occupants given?
 2 **A. I can't recall any specific number.**
 3 Q. Right, and your recollection is that it was also
 4 indicated they were putting hats on their heads?
 5 **A. Yes.**
 6 Q. Did you say also balaclavas?
 7 **A. Yes, as soon as that was mentioned, it is straight away**
 8 **you start to wonder if it is going to be more than**
 9 **a preparatory act, so are they putting hats on, are they**
 10 **putting balaclavas on? So you start to try and piece**
 11 **together what the action is going to be. And that**
 12 **naturally causes a reaction to your own threat**
 13 **assessment.**
 14 Q. Mr Higgins, can I just ask, looking at this witness
 15 statement and your subsequent witness statement, you
 16 make no reference to this.
 17 **A. It was -- it is as I have sat and sort of gone over it,**
 18 **I have sort of recalled later just little snippets of**
 19 **how the -- how it went about.**
 20 Q. Can you assist then as to when you recalled this
 21 information, particularly looking and we see that
 22 witness statements have been provided in March 2012,
 23 May 2012 and then a further statement in July 2014?
 24 **A. It is just the fact that, since then, other things have**
 25 **happened, in my personal life and then I have been able**

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1 **to just sit and go through it by myself and I -- when**
 2 **I got to read the statement again, I was able to recall**
 3 **certain aspects of piecing it together step by step.**
 4 Q. Can I ask in terms of that process of piecing things
 5 together, did you not think then to prepare a further
 6 witness statement to give clarification as to what you
 7 say has come back as you have pieced together the events
 8 of that day?
 9 **A. It merely happened a week ago.**
 10 Q. A week ago?
 11 **A. Yes.**
 12 Q. Okay. So in terms of what you are now telling the
 13 Inquiry as to what you recall by way of an update from
 14 a surveillance officer, that is only information that
 15 has come back to you in April 2017?
 16 **A. Yes.**
 17 Q. If I could return, please, to your witness statement
 18 where you deal with the declaration of Amber at 7.08.
 19 Again, just looking at the flip chart from 9 March, we
 20 can see that State Amber is recorded at 7.08 on the flip
 21 chart. Is the time that you have recorded in your
 22 witness statement relating to Mr Granby calling State
 23 Amber that time taken from the flip chart?
 24 **A. Yes.**
 25 Q. Again, in terms of you relying on that timing from the

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1 flip chart, why did you rely on this as the timing for
 2 State Amber?
 3 **A. I took it as read that that was the correct time, of**
 4 **that being recorded in the logs.**
 5 Q. I think it is after State Amber's declared I think you
 6 have then described seeing from your lay up position on
 7 Church Lane, alpha, bravo and charlie go past, making
 8 their way into the village of Culcheth?
 9 **A. Yes.**
 10 Q. Can I just be clear on this, your statement then goes
 11 on:
 12 "As the firearms team moved forward, delta vehicle
 13 drove towards the junction of Warrington Road. Just as
 14 we approached the junction, alpha, bravo and charlie
 15 vehicles drove past and State Red was declared by X7,
 16 the OFC, at about 19.12."
 17 **A. Yes.**
 18 Q. Can I just ask, are you clear that State Red was
 19 declared as alpha, bravo, charlie went essentially past
 20 the delta car's view?
 21 **A. Yes.**
 22 Q. Again, in terms of recording State Red as 19.12, was
 23 that a time taken from the flip chart also?
 24 **A. Yes.**
 25 Q. Having heard State Red called, what did you do?

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1 **A. We were going to be ready to react to any actions that**
 2 **would happen from the vehicle, so it would have been**
 3 **anyone running from the scene, could we contain that**
 4 **side of the building where the vehicle was on the car**
 5 **park? That would have been our -- one of my primary**
 6 **objectives.**
 7 Q. In terms of the commentary you are hearing over the
 8 radios or transmissions, was it being indicated and
 9 communicated where exactly the vehicle was?
 10 **A. It was, yes.**
 11 Q. So you knew that the vehicle was on Jackson Avenue car
 12 park?
 13 **A. Yes.**
 14 Q. Your statement tells us that you were not able to follow
 15 in convoy behind the charlie vehicle because of the
 16 weight of traffic.
 17 **A. That's correct.**
 18 Q. Can you assist as to -- we have heard some evidence
 19 already that there was slow moving traffic through
 20 Culcheth village that evening. Is that your
 21 recollection also?
 22 **A. Yes.**
 23 Q. Your statement goes on:
 24 "As we drove down Common Lane towards
 25 Jackson Avenue, radio transmission was relayed by the

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1 OFC, X7, to prepare the teams for the vehicle strike."
 2 **A. Yes.**
 3 Q. Due to your position on the road:
 4 "... we had no visual sight of the team and had lost
 5 sight of them. Our vehicle came to a stop at
 6 Common Lane, just past the junction with Jackson Avenue,
 7 G1, V3 and I alighted from the delta vehicle and went to
 8 the pavement adjacent the grassed open area, near to
 9 a telephone box. I was dressed in a black jacket with
 10 police badges displayed, wearing my respirator and
 11 carrying my MP5 carbine."
 12 **A. Yes.**
 13 Q. Can I just then take you to a photograph, please, we
 14 have heard some evidence as to the location of the delta
 15 vehicle at the time when it stops and yourself, V3 and
 16 G1 get out.
 17 It is bundle O, please, page 318.
 18 **A. Thank you.**
 19 Q. We have heard some evidence to suggest that where the
 20 delta vehicle stopped, if you can see there is a silver
 21 car on Common Lane and then just a little forward to
 22 that there is a police vehicle with its nose slightly
 23 pointing on the pavement by the white vehicle. We have
 24 heard the vehicle stopped essentially in the road,
 25 almost between the two, does that fit with your

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1 recollection of where the delta vehicle stopped?
 2 **A. Yes.**
 3 Q. I think you have referenced in your statement the
 4 telephone box.
 5 Can you see to the right of the silver car or almost
 6 next --
 7 **A. Yes.**
 8 Q. Was that the telephone box to which you were referring?
 9 **A. I am.**
 10 Q. I think it is right at this stage delta 1, yourself and
 11 delta 3 were heading towards the car park to the right
 12 of the picture that we can see?
 13 **A. Yes.**
 14 Q. Can you assist in terms of, are you clear that you were
 15 wearing your respirator at that time?
 16 **A. Yes.**
 17 Q. Do you remember whereabouts you were when you put the
 18 respirator on?
 19 **A. Actually I think my respirator was on top of my head at**
 20 **that point.**
 21 Q. When you say on top of your head?
 22 **A. Because of the way the straps are, you can keep it on**
 23 **top of your head, prior to deployment. And yes, it was**
 24 **on top of my head.**
 25 Q. Did there come a time when it moved from the top of your

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1 head so it covered the whole of the face or did it
 2 remain on the top of your head?
 3 **A. I took it off when I started running.**
 4 Q. Where did it go when you took it off?
 5 **A. It would have been held in my hand.**
 6 Q. Why did you take it off if you thought you were heading
 7 towards where the strike was taking place?
 8 **A. Because the strike had taken place, I probably wouldn't**
 9 **need it and it would have come off my head if I was**
 10 **running. So I just wanted to keep hold of my equipment.**
 11 Q. Okay. I think you have set out in your statement that
 12 your black jacket had police badges displayed, and
 13 I think you have confirmed in your 2014 statement that
 14 there was a six-inch wide badge with "Police" in white
 15 lettering on a black background on the rear of the
 16 jacket?
 17 **A. I think it is a blue background.**
 18 Q. Perhaps if you just turn up tab 3. If you could just
 19 confirm, where was the six-inch wide badge with
 20 "Police"?
 21 **A. Sorry, my apologies. The front badge was on my left**
 22 **side of my chest, because if I put my MP5 on aim, you**
 23 **cannot see the police badge.**
 24 Q. Yes.
 25 **A. And on the back was a large blue "Police" in white with**

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1 **blue background, so easily identifiable because it is**
 2 **a black jacket.**
 3 Q. Thank you.
 4 The witness statement -- I am back behind tab 1 now
 5 please, on your 9 March 2012 statement.
 6 You set out that you were wearing your respirator,
 7 carrying your MP5 carbine, going to the pavement
 8 adjacent to the grassed open area near to a telephone
 9 box.
 10 **A. Yes.**
 11 Q. I think you set out then:
 12 "At that point I heard the crack of a firearm being
 13 discharged to my left-hand side. The sound came from
 14 the gap between an office and a restaurant. This was
 15 followed by shouting and the distinctive different sound
 16 of a second discharge of a weapon."
 17 Just pausing there, just to be clear, in terms of
 18 when you heard the first sound of the crack of
 19 a firearm, using photograph 318, you have made it across
 20 the grassy area near to the phone box?
 21 **A. So I am virtually by the phone box, in that vicinity**
 22 **there.**
 23 Q. Were you able to identify from the crack of a firearm
 24 what weapon would have caused that sound?
 25 **A. That would have been the MP5.**

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1 Q. I think it was hearing that sound that identified that
 2 you were heading towards the wrong car park?
 3 **A. Yes.**
 4 Q. Can you confirm your statement sets out that the
 5 shouting and the distinctive different sound of a second
 6 discharge of a weapon, how soon after the crack of the
 7 firearm did you hear the second discharge of a weapon?
 8 **A. It wasn't very long.**
 9 Q. Can you assist by way of seconds?
 10 **A. Less than a second. It was a second, two seconds. The**
 11 **time -- it wasn't a long time but it was -- I would**
 12 **estimate a second to two seconds.**
 13 Q. Just to be clear then, at the time of hearing the second
 14 discharge of a weapon, were you still near to the
 15 telephone box or had you moved?
 16 **A. I started to move now.**
 17 Q. With starting to move, how far had you got away from the
 18 telephone box?
 19 **A. We were sprinting up towards the car park by then.**
 20 Q. Just as much as you can, please, to assist, at the sound
 21 of the second discharge of the weapon, how far had you
 22 got?
 23 **A. I would say I would have been, I would have cleared the**
 24 **building line, the white building which is in the**
 25 **right-hand corner, I would have cleared that, and I was**

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1 **probably in the maybe the service yard or the start of**
 2 **the car park, I would have probably been around about**
 3 **that position.**
 4 Q. How long do you estimate it would have taken to you
 5 sprint from the phone box where you were when you heard
 6 the first discharge of the weapon to the service area
 7 you have just indicated on the photograph?
 8 **A. Four, five seconds?**
 9 Q. Are you able to assist in terms of characterising it in
 10 your witness statement as a distinctive different sound
 11 of a second discharge of a weapon?
 12 **A. Yes.**
 13 Q. What do you mean by that?
 14 **A. The MP5, it is a small calibre weapon, it makes**
 15 **a distinctive sound. It is a crack, the sound is**
 16 **amplified by the dynamics of the buildings and then you**
 17 **get with the shotgun, particularly with the short**
 18 **barrel, which they were using, it is more of a,**
 19 **I suppose it is a lower bassy thud, that is the best way**
 20 **I can describe it. It is a different sound.**
 21 Q. The sound of the shotgun, is that the second distinctive
 22 sound you are describing?
 23 **A. Yes.**
 24 Q. You indicated in the witness statement that after the
 25 first crack of the firearm there was shouting. Are you

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1 able to assist as to what you heard by way of shouts?
 2 **A. It was muffled but it was, there were loud forceful**
 3 **shouts, or commands, but I wouldn't be able to tell**
 4 **exactly the words that were used.**
 5 Q. Can I ask, at this point were you still holding the
 6 respirator rather than wearing the respirator?
 7 **A. Yes, I've got it in my hand, in my left hand. I was**
 8 **holding my MP5 in the high ready position. So it was in**
 9 **this position.**
 10 Q. In the high port position?
 11 **A. Yes, that's correct.**
 12 Q. Can I just seek confirmation because if you read the
 13 witness statement from 9 March, it almost suggests that
 14 you heard the two sounds of weapons being discharged
 15 before starting to run across Common Lane into
 16 Jackson Avenue. Perhaps if we just read the whole
 17 paragraph:
 18 "At that point I heard the crack of a firearm being
 19 discharged to my left-hand side. The sound came from
 20 the gap between an office and a restaurant. This was
 21 followed by shouting and the distinctive different sound
 22 of a second discharge of a weapon. I turned and ran
 23 across Common Lane on to Jackson Avenue, 20 metres along
 24 on the right-hand side was the entrance to the car park.
 25 As I approached the height restrictions to the car park

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1 I heard a third discharge from a weapon."
 2 On reading your witness statement it does appear as
 3 if you heard the two sounds of the weapons before you
 4 make to start to run towards Jackson Avenue and then
 5 hearing the third discharge of a weapon as you reach the
 6 height restriction on the car park. Can you assist with
 7 any clarification in respect of that?
 8 **A. I would -- I would suggest then that the first crack,**
 9 **the first shot I heard, would have got my attention.**
 10 **Specifically with it being amplified by the building**
 11 **line. I have turned in that direction and then hearing**
 12 **the second distinctive sound, then started -- then**
 13 **I would have been on full sprint.**
 14 Q. Looking again, please, at the photograph on 318, the
 15 height restriction to the car park, can you see that on
 16 page 318.
 17 **A. Yes.**
 18 Q. You are describing the height barrier into the entrance
 19 of the car park?
 20 **A. Yes.**
 21 Q. Is that where you were when you heard the third
 22 discharge from the weapon?
 23 **A. I think I wasn't at the barrier, I was approaching the**
 24 **barriers. It was the only landmark I could identify**
 25 **with, when I was doing my statement.**

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1 Q. Again, are you able to assist as to the third discharge
 2 from a weapon, what that sounded like?
 3 **A. That was again a shotgun being deployed.**
 4 Q. Your statement then goes on as you ran on to the car
 5 park you could:
 6 "... see a row of parking spaces to my right, with
 7 a number with parked unattended vehicles in them. This
 8 row ran parallel to the back of business premises on
 9 Common Lane bordered by a wire fence. At the far end
 10 was the alpha, bravo and charlie vehicles. The alpha
 11 vehicle was nose into kind of a hedge directly in front
 12 of a red Audi A6 estate. The bumper of the red Audi was
 13 touching the driver's door of the alpha vehicle.
 14 "The visibility was dark, as I approached and the
 15 nearest light came from street lamps, this was evident
 16 by the use of torches on the officers' weapons piercing
 17 through the cloud of CS powder that had been
 18 discharged."
 19 Where were you when you saw the cloud of CS powder?
 20 **A. I had entered the car park then.**
 21 Q. Yes.
 22 You go on in your statement to get closer to the red
 23 Audi, and you indicate that your attention was "focused
 24 on any of my colleagues who may need assistance". At
 25 that time you saw:

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1 "... Officer U2 standing alone by the open front
 2 passenger door challenging the subject sat in the
 3 driver's seat of the red Audi, aiming his MP5 carbine at
 4 him. He was shouting, 'Armed police, show me your
 5 hands, show me your hands'."
 6 **A. Yes.**
 7 Q. In terms of you have indicated you heard shouting before
 8 that, but was this the first clear command you were able
 9 to hear?
 10 **A. It was the only command I could readily identify as**
 11 **someone shouting -- there was probably other shouting,**
 12 **but I was focused on U2.**
 13 Q. I think at that time you noticed that there was already
 14 a hole in the centre of the glass of the red Audi?
 15 **A. Yes.**
 16 Q. And you noted that there were bloodstains on the T-shirt
 17 of the driver of the red Audi?
 18 **A. That's correct.**
 19 Q. You also indicate that you saw that the left hand of the
 20 driver was covered with a black glove and was on his leg
 21 by the steering wheel?
 22 **A. Yes.**
 23 Q. Are you clear about that?
 24 **A. Yes.**
 25 Q. You indicating it your witness statement that you know

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1 this man:
 2 "I know now this man to be Anthony Grainger ..."
 3 **A. Yes.**
 4 Q. Was that as of 9 March you now know that to be
 5 Mr Grainger?
 6 **A. Yes.**
 7 Q. But at the time of being on the car park on 3 March, did
 8 you know the identity of the man --
 9 **A. Sorry, I misheard your question. No, I was aware it was**
 10 **Anthony Grainger once he had been removed from the**
 11 **vehicle and we were able to see who it was.**
 12 Q. Prior to that time, had you heard anything over the
 13 radio in respect of the driver of the vehicle being
 14 Mr Grainger?
 15 **A. No.**
 16 Q. Then you go on to deal with hearing an appreciation then
 17 by U2 that Mr Grainger had been shot. The shout of
 18 "trauma" going up and then assistance being provided to
 19 give resuscitation attempts and life-saving measures to
 20 Mr Grainger?
 21 **A. Yes.**
 22 Q. You set out as well that you asked for a light -- the
 23 officers were asking for a light, so you switched on
 24 your TAC light attached to your carbine and held it high
 25 in a vertical position to illuminate the working area.

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1 **A. Yes.**
 2 Q. Thereafter H9 replaced you using his TAC light as
 3 a torch?
 4 **A. Yes.**
 5 Q. You thereafter went to the position at the entrance of
 6 the car park to present members of the public coming on
 7 to it.
 8 **A. Yes.**
 9 Q. Thereafter, you deal with attendance at Cheshire
 10 Constabulary cordoning off the car park and you then
 11 being conveyed back to the Tactical Firearms Unit?
 12 **A. Yes.**
 13 Q. Do you recall who took you back to the TFU at Openshaw?
 14 **A. One of the police carriers from the Firearms Unit**
 15 **arrived and we were conveyed in that vehicle from**
 16 **Culcheth to the TFU.**
 17 Q. Who else was with you conveyed back to the TFU?
 18 **A. A number of the officers deployed in the operation.**
 19 Q. Can you assist, prior to being deployed back from
 20 Culcheth back to the TFU, did anyone give
 21 a non-conferral warning to you and the other officers,
 22 warning you not to confer?
 23 **A. I think it would have been -- I think something was**
 24 **said, I am quite confident it was J4, before we set off.**
 25 Q. Can you assist, what did J4 say to you?

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1 **A. He just said, "Right, no conferring, let's get back and**
 2 **start the post-incident procedures, you know what you**
 3 **need to do". So and that was sort of the context of the**
 4 **instruction, and that is what we did.**
 5 Q. When it was said "post-incident procedures, you know
 6 what you need to do", what did you take that to mean?
 7 **A. That we were going to be taken back to start the**
 8 **post-incident procedure and we would be disarmed, any**
 9 **clothing that would have to be taken off us and seized**
 10 **and we would go through the whole step-by-step process.**
 11 Q. Had you ever been involved in a fatal shooting before?
 12 **A. No.**
 13 Q. Had you ever been involved in a post-incident procedure
 14 before?
 15 **A. One with a death in custody.**
 16 Q. Can I ask you just by reference to the post-incident
 17 procedure, to turn behind tab 4 in your witness bundle,
 18 please.
 19 We can see behind tab 4 a page from your police
 20 officer notebook. I just want to ask you because you
 21 have referenced, "05.00 return to TFU", but then,
 22 "4 March 2012 following PIP ..."
 23 Does that mean post-incident procedure?
 24 **A. Yes.**
 25 Q. And a question mark. What is the question mark meant to

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1 indicate next to "PIP", please?
 2 THE CHAIRMAN: Mine hasn't got a question mark.
 3 **A. I have not got a question mark.**
 4 MS CARTWRIGHT: Maybe it is mine, I shall not continue that.
 5 I do apologise.
 6 **A. Okay, my heart rate is going down again.**
 7 Q. Can I ask though in terms of when you got back to
 8 Openshaw, was there any discussion then about creating
 9 a first account or providing your recollection of events
 10 as they had unfolded that day?
 11 **A. Only for the principal officers Q9, X7 and -- I have**
 12 **forgotten his name, now -- the officer who discharged**
 13 **the shotgun.**
 14 Q. Who said only those three officers needed to give
 15 an initial account?
 16 **A. I don't think it was the case that only them -- they**
 17 **were the primary officers involved obviously in the**
 18 **post-incident procedure, so I think the attention was**
 19 **put to them.**
 20 Q. When you say the attention put to them, by whom?
 21 **A. That would have been the start of the post-incident**
 22 **procedure, so we would have had various officers,**
 23 **federation and once everyone started to come in, once**
 24 **the post-incident procedure had been activated.**
 25 Q. Can I ask, in terms of while you were then back at

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1 Openshaw and then I think moved to Claytonbrook, why you
 2 didn't create your notes of your recollection of the
 3 events of that day?
 4 **A. Why?**
 5 Q. Yes.
 6 **A. We were waiting for instruction to see how the**
 7 **post-incident procedure was being managed. So in**
 8 **essence I think we were waiting to be managed and to be**
 9 **told when and how to do it.**
 10 Q. Why were you expecting or waiting for someone to tell
 11 you when to do that?
 12 **A. Because it is a controlled environment, and I wouldn't**
 13 **expect anything less done in that situation.**
 14 Q. Was there anything said before you essentially went home
 15 that following early morning as to when you would then
 16 be asked to provide your witness statement or call back
 17 in?
 18 **A. No, nothing was said.**
 19 Q. We know that you attended Nexus House on 9 March 2012 --
 20 **A. Yes.**
 21 Q. -- can you assist in the six days following, why you
 22 didn't prepare a witness statement any sooner?
 23 **A. I think there was a -- discussions between the IPCC and**
 24 **the management who were dealing with the post-incident**
 25 **procedure. I think they were insisting at one point on**

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1 **doing video interviews, which was not particularly --**
 2 **wasn't something which the advisers or the solicitors**
 3 **wanted us to do and that had been appointed by the**
 4 **federation. So I was aware of that. But apart from the**
 5 **length of time, no, I don't know why.**
 6 Q. Are you able to assist as to -- you have indicated
 7 solicitors and the federation.
 8 **A. Because I was slightly separated from the rest of the**
 9 **group, being working at the Firearms Unit, I would be**
 10 **getting just an update by phone to say, "Yes, this is**
 11 **happening, we are moving along with it, we will give you**
 12 **an update when there is further progression of when and**
 13 **how it is going to happen".**
 14 Q. Can I ask, do you recall, were you one of the officers
 15 that attended a meeting on 8 March 2012 arranged by the
 16 PFOA when V53, the officer involved in the Mark Duggan
 17 shooting and two members of the PFOA travelled to
 18 Manchester to speak to the firearms officers?
 19 **A. Yes, I was.**
 20 Q. Can you assist as to what was discussed in that meeting?
 21 **A. It was welfare. The discussion centred round the**
 22 **apportionality(?) of blame that seemed to be attributed**
 23 **to him for the riots that occurred, the lack of support**
 24 **he received from senior management in the**
 25 **Metropolitan Police, namely an assistant commissioner**

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1 **going on the radio and calling him a murderer, how that**
 2 **had an effect on him, his family and it was based round**
 3 **how he was feeling at the time and how he was supported.**
 4 Q. Can you recall whether all of the firearms officers,
 5 alpha, bravo, charlie and delta were present. Can you
 6 assist at all with that?
 7 **A. I think we were all there.**
 8 Q. From the best of your recollection, do you recall G1
 9 being there?
 10 **A. I couldn't guarantee if I knew he was there or not.**
 11 Q. And N7?
 12 **A. Again, I can't wholeheartedly say if I knew he was**
 13 **there, but I know it was a full room.**
 14 Q. Do you recall whether the preparation of the witness
 15 statement the following day was as a direct result of it
 16 being identified in that meeting that statements and
 17 accounts hadn't been provided by officers at that time?
 18 **A. I can't recall any conversation along them lines.**
 19 Q. In any event, the following day, on Friday, 9 March you
 20 attended with the other officers from 1.15 at
 21 Nexus House where you prepared your witness statement?
 22 **A. Yes.**
 23 Q. I think you have confirmed also that as part of that
 24 process of creating your witness statement, you did
 25 confer with your colleagues from time to time on matters

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<p>1 relating to times, vehicles, locations and suspect 2 details? 3 A. Yes. 4 MS CARTWRIGHT: Thank you, if you would just wait there, 5 Mr Higgins. 6 THE CHAIRMAN: Any questions, Mr Thomas. 7 MR THOMAS: Just a couple, sir. 8 Questions from MR THOMAS 9 MR THOMAS: I represent Mr Grainger's family, just a couple 10 of questions. 11 Can I take you back to when you are in the car park, 12 or just before you entered the car park, you hear the 13 first bang, yes. Very shortly after you hear the first 14 bang you hear the next bangs; is that correct? 15 A. Yes. 16 Q. Can I put this passage of time to you to see what your 17 evidence is on this. You have explained to the chairman 18 how you distinguish between the sounds of the MP5 and 19 the shotguns, I am not going to go through that again, 20 you have given quite clear evidence in relation to this. 21 What I want to put to you is, if it were suggested that 22 you have got that wrong, right, the timings, a very 23 short period of time and the suggestion was it was 10 24 seconds or more, do you follow between the bangs? 25 THE CHAIRMAN: Between the first and second, do you mean?</p> <p style="text-align: center;">Page 169</p>	<p>1 A. Yes. 2 MR THOMAS: Thank you, that is all I ask. 3 THE CHAIRMAN: Mr Weatherby. 4 Questions from MR WEATHERBY 5 MR WEATHERBY: Yes, very briefly from me, I represent 6 Mr Grainger's partner. Just dealing with the shots, 7 I just want to clarify this because it is very 8 important. 9 You hear the first shot, which is the MP5 shot? 10 A. Yes. 11 Q. Then within two seconds you hear the second shot which 12 is not an MP5 shot, it is a shotgun discharge? 13 A. Yes. 14 Q. It is between those two shots that you hear the 15 shouting? 16 A. No. 17 Q. In your statement you say you heard a crack of 18 a firearm. Then you say: 19 "... this was followed by shouting and the 20 distinctive different sound of a second discharge." 21 A. Yes. 22 Q. Do you mean by that that there is a shot and then there 23 is shouting and then there is a second discharge or do 24 you mean there is a shot and then simultaneously there 25 is shouting and a second discharge?</p> <p style="text-align: center;">Page 171</p>
<p>1 MR THOMAS: Between the first and second bangs. What would 2 you say? 3 A. I would say no. 4 Q. Because you have been clear in your evidence, it is 5 a very short period of time between the two bangs, yes? 6 A. Yes. 7 Q. Okay. 8 Second area, when you heard the first bang, and you 9 said you heard shouting as well, at the same time, 10 I think you said, yes? 11 A. Yes. 12 Q. Did you discern glass breaking? 13 A. No. 14 Q. Okay. Could that be because you were not in a position 15 to hear glass breaking? 16 A. Possibly. 17 Q. Okay. 18 Thirdly, when you actually ran on to the scene and 19 you saw your colleagues in various parts in situ, did 20 you see Mr Totton? 21 A. He -- there was two subjects, I don't know who they 22 were, to, as where the Audi was parked, nearside or the 23 passenger side, they were sort of on the grass verge 24 area. 25 Q. They were already out of the vehicle?</p> <p style="text-align: center;">Page 170</p>	<p>1 A. I think they were -- I think the best way, it was once 2 I had orientated myself, you hear that sharp report from 3 the -- a round being discharged, you focus on the 4 direction where that came from, which would probably be 5 the gap between the white building and the red brick 6 building. 7 Q. Yes. 8 A. And then my senses have become more acute to the 9 direction and then I have then heard the shouting. So 10 it was probably simultaneously. It was all a continuous 11 sort of deciphering, that massive amount of information 12 was suddenly, and thinking through everything. If that 13 makes sense -- does that sort of answer your question? 14 I am not trying to be ambiguous, I am trying to -- 15 THE CHAIRMAN: When you say "simultaneous", do you mean 16 simultaneous with the first discharge you heard or the 17 second discharge. 18 A. I think what I am trying to explain, sir, is as we have 19 realised we were in the wrong position, so your heart is 20 going, you are trying to work out, because you are here 21 to do a job and you have a certain task. We have 22 realised we have been put in a position, we don't know 23 where everyone is, we have already lost alpha, bravo, 24 charlie when they have driven past us, so there is that 25 small element of confusion, and that sort of small bit</p> <p style="text-align: center;">Page 172</p>

1 of panic of: where is everyone? Because you don't want
 2 to let anyone down and then you immediately are brought
 3 back into focus when you hear the first discharge.
 4 But at the sound of the first discharge my attention
 5 is ultimately drawn to where it has come from, sort of
 6 like the crack and thump of a round. And then you hear
 7 the noise then, you sort of refocus and it was all sort
 8 of a continual like, and straight away you start to
 9 download going, "Something is happening", how to react
 10 to it.
 11 I cannot give you a definitive answer whether it was
 12 before or after. It was just how the process, how
 13 I downloaded that information.
 14 Q. Okay then. Let me take it slightly differently, you
 15 don't hear shouting and then the first shot and then the
 16 second shot?
 17 A. No, I don't.
 18 Q. You hear the first shot and then you are not sure
 19 whether you hear shouting and the second shot or whether
 20 you hear them together?
 21 A. It is shot, shouting, then the first round of the
 22 shotgun is discharged.
 23 Q. Thank you very much. That is clear.
 24 From your description it is then some distance of
 25 time and in fact foot distance before you hear the third

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1 shot?
 2 A. Yes.
 3 Q. That might be, I don't know, five or ten seconds later?
 4 A. I wouldn't say it would have been that length of time.
 5 Q. Right, but it is long enough for you to get round the
 6 corner and up towards the car park?
 7 A. It was less than 20 minutes(?), I would like to think
 8 I could cover that distance in a shorter period than
 9 five seconds.
 10 Q. Right.
 11 The other thing I just want to, it is difficult,
 12 isn't it, that you make this first account six days
 13 later, so in fact it is quite difficult after six days
 14 to remember things which are happening within a few
 15 seconds, to get the order right?
 16 A. Yes.
 17 Q. Memory is a funny thing, isn't it?
 18 A. Memories do strange things to you.
 19 Q. Yes, indeed.
 20 We come to more than five years later, and there is
 21 this further detail that you seem to recollect.
 22 A. It is as you sit there and read through your statement,
 23 and you have that sort of -- you just start piecing
 24 little things at the back of your memory.
 25 Q. Okay, but here you are recalling the deployment on what

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1 you have been told was a gang of armed robbers, yes?
 2 A. Hmm.
 3 Q. You are telling us today for the first time that before
 4 you were actually deployed to the first or second car
 5 park, not long before but before that, you are told that
 6 they are putting on balaclavas?
 7 A. I said they were putting hats on, and -- but maybe
 8 rolling down, but there was -- word of hats being put.
 9 Q. I will be corrected if I'm wrong, I think you actually
 10 used the word "balaclava".
 11 THE CHAIRMAN: Both words, he used both words.
 12 MR WEATHERBY: Indeed. Yes.
 13 I mean it is a pretty significant detail, isn't it?
 14 A. It is.
 15 Q. You don't think memory is playing a bit of a trick on
 16 you there, officer?
 17 A. It could have been. There is a lot happened to me when
 18 I have had the incident and to myself since that event.
 19 MR WEATHERBY: Thank you very much.
 20 MS COLLINS: No questions thank you, sir.
 21 MS WHYTE: No thank you, sir.
 22 THE CHAIRMAN: Anything else?
 23 MS CARTWRIGHT: No thank you, sir.
 24
 25

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1 Questions from THE CHAIRMAN
 2 THE CHAIRMAN: One thing from me, if you don't mind. You
 3 have told us that when you made your statement on
 4 9 March you, like the other officers, had access to the
 5 flip chart. Did you also have access to any aerial
 6 photographs or plans from the briefing to help you
 7 locate things or were you going purely from memory.
 8 A. Some was from memory and some was from my own phone, of
 9 just -- of looking from sort of looking at the building,
 10 of how I set out. I wanted to, I think when I looked at
 11 my phone for the map, it was the phone box, where was
 12 that in relation, did I see a phone box and that was the
 13 clarification of when I stepped out of the vehicle.
 14 THE CHAIRMAN: When you say you looked at your phone?
 15 A. Google Maps.
 16 THE CHAIRMAN: Oh I see.
 17 A. I just looked at Google Maps on my phone. Sorry.
 18 THE CHAIRMAN: I follow. Okay.
 19 Anything arising out of that.
 20 MS CARTWRIGHT: No thank you, sir.
 21 THE CHAIRMAN: Thank you very much, Mr Higgins, for helping
 22 the Inquiry.
 23 That is the end of your evidence. You are free to
 24 go.
 25 I think we had better take a short break for the

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1 sake of the stenographer and the shorthand writer, but
 2 we will make it just five minutes.
 3 Am I right in thinking that we can deal with the
 4 remaining witness much more quickly, we have been
 5 an hour and a quarter.
 6 MS CARTWRIGHT: Yes, sir.
 7 (3.24 pm)
 8 (A short adjournment)
 9 (3.29 pm)
 10 MS CARTWRIGHT: V3, please.
 11 V3 (sworn)
 12 THE CHAIRMAN: Thank you, V3. Would you remind remaining
 13 standing, it makes it easier for those who are entitled
 14 to see you to do so and you will probably find the shelf
 15 in front of you useful for managing the various files
 16 you will be referred to.
 17 **A. Thank you sir.**
 18 **Questions from MS CARTWRIGHT**
 19 MS CARTWRIGHT: Good afternoon, V3, my name is
 20 Sophie Cartwright and I ask questions on behalf of the
 21 Inquiry. You should have to your left-hand side a copy
 22 of the cypher key. Please use that when referring to
 23 any of the officers and in addition in front of you you
 24 have the bundle where we find your various witness
 25 statements.

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1 Could I just take you, please, through each of
 2 those.
 3 **A. Yes, ma'am.**
 4 Q. Behind tab 1, please, we can see your statement of
 5 9 March 2012.
 6 **A. Yes.**
 7 Q. Thank you. Moving to tab 2, your witness statement of
 8 21 May 2012.
 9 **A. Yes.**
 10 Q. I am going to then skip over 3 and 4, because they
 11 relate to special measures.
 12 Moving then please to the statement behind tab 5 of
 13 31 July 2014.
 14 **A. Yes.**
 15 Q. Can I ask you, are the contents of those witness
 16 statements true to the best of your knowledge and
 17 belief?
 18 **A. They are ma'am, yes.**
 19 Q. If I can just in a general way, please, V3, deal with
 20 your qualifications and experience.
 21 **A. Yes, sorry.**
 22 Q. Sorry, first of all when did you become a police
 23 officer?
 24 **A. 1989.**
 25 Q. Thank you. In March 2012, what rank were you?

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1 **A. A PC.**
 2 Q. Is that still the case?
 3 **A. It is.**
 4 Q. Are you still serving?
 5 **A. Yes.**
 6 Q. When did you become an AFO?
 7 **A. 1997.**
 8 Q. Thank you, and an SFO?
 9 **A. In 2004.**
 10 Q. Thank you.
 11 Were you at that time a CTSFO?
 12 **A. Not until 2010/2011.**
 13 Q. Thank you.
 14 I am just going to ask you a few questions in
 15 respect of the briefing of 3 March and then I want to
 16 move into your 9 March statement, please.
 17 Can I just ask you briefly within the general
 18 firearms bundle, please, behind tab 22, we can see there
 19 the PowerPoint presentation given for the briefing.
 20 I am not going to take you through the transcript.
 21 **A. Yes, ma'am.**
 22 Q. Can I just ask you very generally, please, at page 1267,
 23 we see reference to:
 24 "The subjects are believed to be engaged in armed
 25 robberies in the north-west region."

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1 It is also repeated by reference to the intent for
 2 the three subjects of the operation.
 3 **A. Yes.**
 4 Q. What did you take "armed robberies" to reference,
 5 please?
 6 **A. I take that as that it is a robbery where either
 7 firearms or other weapons are used to carry out that
 8 offence.**
 9 Q. Thank you.
 10 Just staying on page 1267, please, V3, we see
 11 reference to intelligence from a robbery in Preston in
 12 2008 which references "these subjects". And again
 13 a repetition of, "These subjects making good their
 14 escape". Did you take that intelligence information to
 15 relate to each of the subjects of the operation at that
 16 time, Totton, Grainger and Rimmer?
 17 **A. To all three, yes.**
 18 Q. Yes, thank you.
 19 V3, I am going to take you into your witness
 20 statement of 9 March and the Inquiry, I don't want to
 21 mean any disrespect to you because the Inquiry has
 22 already heard from the three other witnesses in the
 23 delta vehicle that day, so it has assisted the Inquiry
 24 in understanding the events from the briefing and the
 25 deployment to Leigh police station and then the

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<p>1 deployment out of Leigh police station to the Raven Inn. 2 Thereafter moving to Church Lane in Culcheth. 3 A. Okay, ma'am. 4 Q. I am going to take you please within your witness 5 statement behind tab 1 to the time where you were at 6 Church Lane, please, in Culcheth. 150 metres from the 7 junction with Warrington Road. 8 That is about the top third of your witness 9 statement, can you see that on page 176? 10 A. Yes. 11 Q. Thank you. 12 You set out in your witness statement that: 13 "At this time our role was to react to any subjects 14 that were out on foot if a possible arrest was 15 authorised." 16 A. Yes. 17 Q. Was that communicated over the radio? 18 A. It will have been, yes. 19 Q. You then set out in your witness statement: 20 "A short time later, approximately 19.05 hours, 21 I heard over the radio that the OFC was deploying 22 firearms officers to a car park off Common Lane in order 23 to detain three subjects who were in a red Audi motor 24 vehicle." 25 Pausing there, we know that you attended the car</p> <p style="text-align: center;">Page 181</p>	<p>1 vehicles. N7 stopped our vehicle on Common Lane at its 2 junction with Jackson Avenue." 3 Again, if can take you to some photographs now just 4 to deal with this aspect of your evidence in terms of 5 what happened once you are in Culcheth village please. 6 It is bundle O, page 318, please, V3. 7 There should just be numbers handwritten in the top 8 right-hand corner. 9 A. 318? 10 Q. Please. 11 A. Yes. I have that now, ma'am. 12 Q. I am going to summarise the evidence we have heard as to 13 the position where N7 stopped. 14 If you can see on the photograph at page 318, there 15 is a silver car in Common Lane near to a telephone 16 box -- 17 A. Yes, ma'am. 18 Q. -- and then there is a police vehicle we can just see 19 its nose next to the white vehicle? 20 A. Yes. 21 Q. We have heard evidence from N7 that he stopped on 22 Common Lane essentially between the two vehicles, does 23 that fit with your recollection? 24 A. I would say so, yes. 25 Q. We have also heard evidence that having stopped there</p> <p style="text-align: center;">Page 183</p>
<p>1 park and then became aware that there were three 2 subjects -- 3 A. Yes, ma'am. 4 Q. -- but I just want as much clarity as possible, are you 5 clear that at the time that transmission was made, 6 shortly after 7.05, that it was communicated that there 7 were three subjects in the vehicle? 8 A. As far as I remember, yes. 9 Q. Thank you. 10 I think the Inquiry has heard evidence that 11 essentially you then see alpha, bravo and charlie go 12 past -- 13 A. That's correct. 14 Q. -- but due to traffic you are unable to take up your 15 position behind the charlie vehicle in the convoy. 16 A. Yes, ma'am. 17 Q. That was due to the various civilian vehicles in front 18 of you? 19 A. That's correct, yes. 20 Q. Then that had resulted in a loss of sight of your 21 colleagues in alpha, bravo and charlie. 22 A. Yes. 23 Q. You set out then in your witness statement that by the 24 time you got through the junction: 25 "... we had lost sight of the other firearms</p> <p style="text-align: center;">Page 182</p>	<p>1 due to the weight of the traffic, the occupants of the 2 vehicle, including you, then made your way to the car 3 park to the right of the picture, because that is where 4 you believed at that time the strike was place? 5 A. That's correct, yes. Yes. 6 Q. Your statement sets out that you had put your respirator 7 on, can you assist as to when you put your respirator 8 on, please? 9 A. From memory, as I was getting out of the vehicle. 10 Q. In terms of putting it on, was it fully over your face? 11 A. Yes. 12 Q. I think we can see from your witness statement, 13 essentially other than the respirator there was nothing 14 that you were wearing that identified you as a police 15 officer? 16 A. No, ma'am, no. 17 Q. Did you have access to any clothing that did identify 18 you as a police officer within the vehicle? 19 A. Not that I remember. There would have been a police 20 baseball cap, but that is -- you are unable to wear that 21 if you are wearing a respirator. 22 Q. Thank you. 23 Can you assist, you tell us in your witness 24 statement that having alighted from the vehicle, you and 25 your colleagues started to run towards the car park.</p> <p style="text-align: center;">Page 184</p>

1 You had only run a few metres:
 2 "... when I heard two loud bangs come from the
 3 opposite direction to the one I was running."
 4 Just pausing there, V3 if you can assist with the
 5 photographs we know that you were running in the
 6 direction towards the car park on the right. Where had
 7 you reached when you heard the two loud bangs?
 8 **A. I think it was literally only a matter of a couple of**
 9 **metres, it was quite a short time after exiting the**
 10 **vehicle.**
 11 Q. Had you reached the opposite side of the pavement?
 12 **A. I don't think I had. No.**
 13 Q. Okay, do you still believe that you were some way on
 14 Common Lane in the road itself when you heard the two
 15 bangs?
 16 **A. Yes.**
 17 Q. Can you assist as to what the two loud bangs were?
 18 **A. They sounded like a shotgun.**
 19 Q. Is shotgun the only description you can give to the two
 20 loud bangs you heard?
 21 **A. Yes, ma'am.**
 22 Q. Can you assist as to the time gap between the two loud
 23 bangs, was there any form of gap, were they in
 24 succession?
 25 **A. Not that I recall.**

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1 Q. Not that you recall, so they were close to one another
 2 then?
 3 **A. Relatively close to one another from what I remember,**
 4 **yes.**
 5 Q. I think, having heard those two loud bangs, it
 6 identified that you were essentially heading towards the
 7 wrong car park and that the strike was taking place on
 8 the car park behind the buildings on Common Lane, on
 9 Jackson Avenue?
 10 **A. That's correct, yes.**
 11 Q. Can I ask, did you hear anything else other than those
 12 two loud bangs at that time?
 13 **A. No.**
 14 Q. You then go on to describe running with your colleagues,
 15 G1 and V8, to the direction of where the bangs had come
 16 from and as you ran along Jackson Lane you saw the three
 17 covert firearms vehicles on the car park, you ran onto
 18 the car park and joined your colleagues and you then ran
 19 to the front nearside passenger door of a red Audi motor
 20 vehicle, where you could see that the door was open and
 21 U2 was trying to pull a male across a passenger seat and
 22 out of the vehicle.
 23 **A. That's correct, yes.**
 24 Q. Just pausing there, from the time when you heard the two
 25 bangs and then you ran to the Jackson Avenue car park

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1 and towards the vehicle, roughly how long did it take
 2 you to make that journey from hearing the bangs to the
 3 red Audi?
 4 **A. It is a guess, but I would say approximately 30 seconds.**
 5 Q. 30 seconds.
 6 Can I ask you, during that period when you were
 7 running, did you have your respirator on?
 8 **A. I did, yes.**
 9 Q. And did you hear anything else as you were running or
 10 making to the car park?
 11 **A. No.**
 12 Q. Again, in terms of by the time you got to the red Audi,
 13 are you clear that the first thing you saw was
 14 essentially the driver being pulled out the passenger
 15 door?
 16 **A. Attempted to be pulled out, yes.**
 17 Q. That you then assisted by grabbing hold of the male's
 18 left arm and pulling him out of the vehicle and on to
 19 the floor?
 20 **A. That's correct.**
 21 Q. Can I ask, at that time when you got to the vehicle, did
 22 you notice whether or not any CSDC had been dispersed?
 23 **A. No.**
 24 Q. Did you notice any damage to the red Audi?
 25 **A. No.**

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1 Q. I think, having assisted in removing the male from the
 2 vehicle, you then noticed that there had been a shot to
 3 the male and you identify, you know him to be
 4 Anthony Grainger. Did you know him at that time as
 5 Mr Grainger when he had been removed from the vehicle?
 6 **A. No.**
 7 Q. It was after the event you found out it was Mr Grainger?
 8 **A. Yes, ma'am.**
 9 Q. I think having him removed from the vehicle at that
 10 point, you heard firearms officers shouting, "He has
 11 been shot, he has been shot"?
 12 **A. That's correct, yes.**
 13 Q. Prior to hearing that, had you heard any other shouts or
 14 commands?
 15 **A. No.**
 16 Q. I am not going to deal with your evidence then as to the
 17 resuscitation attempts and your involvement with
 18 providing attempts for treatment to Mr Grainger, but
 19 I think it was during that period that you removed your
 20 respirator?
 21 **A. If I remember rightly, somebody removed it for me whilst**
 22 **I was giving chest compressions to Mr Grainger.**
 23 Q. Thank you.
 24 I think having assisted Mr Grainger, or attempts to
 25 assist Mr Grainger, you then after that carried out

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1 scene security duties?
 2 **A. That's correct, yes.**
 3 Q. And thereafter left the scene and made your way to the
 4 firearms training unit at Claytonbrook.
 5 **A. Yes, ma'am.**
 6 Q. Can I ask, before going to Claytonbrook, did you go via
 7 Openshaw or did you go directly to Claytonbrook?
 8 **A. Openshaw first.**
 9 Q. Thank you.
 10 Your statement sets out that you took part in
 11 post-incident procedures. Can you assist as to what
 12 post-incident procedures you were a party to that
 13 evening?
 14 **A. Once we arrived at Openshaw, we were there for a short**
 15 **time --**
 16 Q. Yes.
 17 **A. -- and then we were instructed to go to Openshaw -- my**
 18 **apologies, Openshaw first and then on to Claytonbrook.**
 19 Q. Instructed by who?
 20 **A. I presume, from memory -- my apologies. (Pause)**
 21 **J4.**
 22 Q. Thank you. When you arrived at Openshaw, did J4 give
 23 you any particular instructions?
 24 **A. Other than that we sat in the canteen.**
 25 Q. At Claytonbrook, were any directions or instructions

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1 given as to the format of the post-incident procedure?
 2 **A. No.**
 3 Q. Do you recall whether anyone, either at Culcheth,
 4 Openshaw or Claytonbrook that evening or into the early
 5 hours gave you a non-conferral warning?
 6 **A. No.**
 7 Q. During the aftermath then of the events on Culcheth
 8 during 3 March into 4 March, did you give consideration
 9 to preparing an account of your involvement in the
 10 events of that day?
 11 **A. Yes, I think everybody had that opinion.**
 12 Q. Can you just expand on what mean by everyone had that
 13 opinion?
 14 **A. I think it was a bit of a surprise when we were told**
 15 **that nothing was to be written down at that stage.**
 16 Q. Who told you that nothing was to be written down at that
 17 stage?
 18 **A. I can't remember, there were that many people at**
 19 **Claytonbrook, I can't remember exactly where that came**
 20 **from.**
 21 Q. Can you assist in any way, just to assist the chairman
 22 in understanding who --
 23 **A. I am afraid I can't, no.**
 24 Q. Notwithstanding that you were told being told not to
 25 write anything down, did you not think, "Actually I want

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1 to record" and set about that in any event?
 2 **A. Yes.**
 3 Q. And you did?
 4 **A. No, I didn't.**
 5 Q. You didn't?
 6 **A. No.**
 7 Q. Was any instruction given as to when you would be
 8 providing your accounts and witness statements?
 9 **A. Not at that time, no.**
 10 Q. V3, you seem to be indicating that that position or
 11 instruction that was being given caused a degree of
 12 frustration to you.
 13 **A. Yes, ma'am.**
 14 Q. Did you express any concern about what you were being
 15 told or instructed about not creating an account or
 16 a witness statement at that time?
 17 **A. Not at that time, no.**
 18 Q. Did there come time that you did express concern?
 19 **A. Not that I recall.**
 20 Q. No. Can I ask then, the Inquiry has heard evidence that
 21 on 8 March 2012, representatives from the PFOA attended
 22 at Manchester in company with V53, the officer involved
 23 in the Duggan shooting.
 24 **A. Yes, ma'am.**
 25 Q. Were you in attendance at a meeting where they attended

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1 and spoke to the firearms officers who had been involved
 2 in the events of 3 March?
 3 **A. Yes, ma'am.**
 4 Q. Can you assist the Inquiry as to what was said at that
 5 time in that meeting?
 6 **A. Not exactly. It was a welfare visit, as far as I was**
 7 **concerned, and that was the nature of the conversations**
 8 **that took place.**
 9 Q. Do you recall the PFOA asking essentially about your
 10 accounts and being surprised when it was communicated
 11 that actually statements hadn't been prepared at that
 12 time?
 13 **A. No, ma'am.**
 14 Q. Can you recall whether or not the appointment then the
 15 following day at Nexus House to provide your witness
 16 statement was as a result of that PFOA visit on 8 March?
 17 **A. I couldn't say, ma'am.**
 18 Q. Can you recall then who instructed you to attend at
 19 Nexus House on 9 March to prepare your witness
 20 statement?
 21 **A. I can -- again, I can only presume from memory that it**
 22 **was J4.**
 23 Q. Thank you.
 24 Can I ask you, there should be a flip chart to the
 25 right which the Inquiry is aware was used within the

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<p>1 meeting of the firearms officers on 9 March for the 2 purposes of preparing witness statements. 3 Do you recall that flip chart? 4 A. I do, ma'am, yes. 5 Q. Can I ask, in terms of the timings recorded on that flip 6 chart -- we can see comparable timings of some of the 7 information on that flip chart being used in your 8 witness statement -- did you directly use those timings 9 within the flip chart to inform your recollection of the 10 events of 3 March, as to the timings of the various 11 matters? 12 A. I did, ma'am, but I think I actually on my statement 13 didn't specifically put the exact time -- 14 Q. No. 15 A. -- on one of the occasions. 16 Q. You didn't use all of it, but insofar as we look at the 17 timings of the tour of duty commencing and about the 18 time at 6.15 of moving to Culcheth, would they be times 19 that you took from that flip chart? 20 A. Yes, ma'am. 21 Q. Again, in terms of how are you sure that the timings in 22 that document were accurate to use as the basis for your 23 witness statement? 24 A. I believed that what was being put on to the flip charts 25 were correct and had been checked and double-checked.</p> <p style="text-align: center;">Page 193</p>	<p>1 MR WEATHERBY: Your evidence is that you were instructed on 2 the night or on the early morning? 3 A. As far as I remember, yes, sir. 4 Q. Although you cannot recall exactly who that was, am 5 I right that that was a supervisor or someone within 6 Greater Manchester Police? 7 A. I couldn't tell you whether it came from the legal 8 representative or from the federation, I am afraid. 9 Q. Right, so it could have been within management, it could 10 have been the federation, it could have been the 11 lawyers? 12 A. Yes, sir. 13 MR WEATHERBY: You really cannot remember? 14 A. No, sir. 15 MS WHYTE: No thank you, sir. 16 THE CHAIRMAN: Anything else? 17 MS CARTWRIGHT: No thank you, sir. 18 Thank you V3. 19 Questions from THE CHAIRMAN 20 THE CHAIRMAN: Just a couple of quick points. 21 Obviously you were MASTS trained, do you remember 22 when you got your MASTS training? 23 A. I think it was early 2005, sir. 24 THE CHAIRMAN: Did that include training in special 25 munitions?</p> <p style="text-align: center;">Page 195</p>
<p>1 Q. You confirm in your 9 March statement that, as part of 2 that afternoon of completing your witness statement, you 3 from time to time clarified with your colleagues matters 4 relating to time, vehicles, locations and subject 5 details? 6 A. Yes, ma'am. 7 Q. Other than the firearms officers that were creating 8 their statements, who else was present in the room 9 during this process? 10 A. I seem to remember a legal representative being there. 11 Q. Yes. 12 A. Mr Holroyd I think it was. 13 MS CARTWRIGHT: Thank you. 14 Thank you, V3. If you would just wait there. 15 Questions from MR WEATHERBY 16 MR WEATHERBY: Just this, please. I ask questions on behalf 17 of Mr Grainger's partner. Do I have this right, but for 18 the fact that you were instructed you would have made 19 your own first account on the evening or the early 20 morning? 21 A. I certainly would have done it prior to the six days 22 that took place, sir. 23 MR THOMAS: Sorry, sir, your voice is dropping. 24 A. Sorry, my apologies. 25 THE CHAIRMAN: "Prior to the six days" he said.</p> <p style="text-align: center;">Page 194</p>	<p>1 A. Yes, sir. 2 THE CHAIRMAN: You had been an AFO for a considerable time, 3 you must have been on many deployments? 4 A. Yes, sir. 5 THE CHAIRMAN: Not all of which of course would have 6 resulted in decisive action. Do you have any idea of 7 the figures we are talking about, how many times have 8 you been deployed? 9 A. At a guess I could say 150. 10 THE CHAIRMAN: Yes. What proportion of those would have 11 resulted in decisive action, roughly? 12 A. I would say 60 to 70 of those. 13 THE CHAIRMAN: Yes. 14 Okay. 15 The lay up, you were there for a long time? 16 A. Yes, sir. 17 THE CHAIRMAN: I say "the lay up", when you were at Leigh, 18 you were there for a long time. What did you do during 19 that period? 20 A. Just generally a rest period, sir. We would just watch 21 TV, chill out, read a book. 22 THE CHAIRMAN: Okay. 23 Thank you very much. 24 MS CARTWRIGHT: No thank you, sir. 25 Thank you V3.</p> <p style="text-align: center;">Page 196</p>

1	THE CHAIRMAN: That is the end of your evidence. Thank you	1	Questions from THE CHAIRMAN195
2	for helping the Inquiry, you are free to go.	2	
3	MS CARTWRIGHT: Sir, that concludes today's evidence. We	3	
4	reconvene on Tuesday.	4	
5	We have a large number of witnesses listed on	5	
6	Tuesday, including Mr Totton, Mr Travers and those	6	
7	witnesses Cath Bates, James Donaghy and Simpson.	7	
8	THE CHAIRMAN: Yes.	8	
9	MS CARTWRIGHT: We will take stock where we are at on	9	
10	Tuesday morning.	10	
11	THE CHAIRMAN: I understand.	11	
12	MS CARTWRIGHT: Thank you, sir.	12	
13	THE CHAIRMAN: I think that we should start at the usual	13	
14	time.	14	
15	MS CARTWRIGHT: Is the usual time now 10.30, sir?	15	
16	THE CHAIRMAN: Yes, what should be the usual time and what	16	
17	will from now on, if I have anything to do with it, be	17	
18	the usual time, 10.30.	18	
19	MS CARTWRIGHT: Thank you, sir.	19	
20	THE CHAIRMAN: Thank you.	20	
21	(3.53 pm)	21	
22	(The Inquiry adjourned until 10.30 am on Tuesday,	22	
23	18 April 2017)	23	
24		24	
25		25	
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