

<p>1 Tuesday, 14 February 2017</p> <p>2 (10.30 am)</p> <p>3 THE CHAIRMAN: Yes, Mr Beer.</p> <p>4 MR BEER: Robert Cousen, please.</p> <p>5 MR ROBERT COUSEN (sworn)</p> <p>6 THE CHAIRMAN: Mr Cousen, you are likely to be there for</p> <p>7 some time as you know, so you are very welcome to sit</p> <p>8 down throughout.</p> <p>9 A. For the time being I will stand, sir.</p> <p>10 Questions from MR BEER</p> <p>11 MR BEER: Mr Cousen, my name is Jason Beer and I ask</p> <p>12 questions with Ms Cartwright, who sits to my right, on</p> <p>13 behalf of the Inquiry. In front of you there should be</p> <p>14 a folder. Could you open it up at tab 1, please. Can</p> <p>15 we go through a series of witness statements. If you</p> <p>16 look at tab 1 --</p> <p>17 A. Okay.</p> <p>18 Q. -- you should find a witness statement, dated</p> <p>19 30 May 2012.</p> <p>20 A. Yes.</p> <p>21 Q. Is that in your name?</p> <p>22 A. Yes.</p> <p>23 Q. Then, over to tab 2, your witness statement dated</p> <p>24 7 September 2012.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 1</p>	<p>1 A. Sorry, yes, that's correct.</p> <p>2 Q. Tab 11, 11 January 2013.</p> <p>3 A. Yes.</p> <p>4 Q. Are the contents of those four reports true to the best</p> <p>5 of your knowledge and belief?</p> <p>6 A. Yes.</p> <p>7 Q. Thank you.</p> <p>8 Can I start, please, with the circumstances</p> <p>9 surrounding the commencement of Operation Shire in 2011.</p> <p>10 At what rank were you at that stage?</p> <p>11 A. I was a Detective Inspector at that stage.</p> <p>12 Q. Do you remain a Detective Inspector?</p> <p>13 A. No, I am a Detective Chief Inspector now.</p> <p>14 Q. How long had you been serving, by October 2011, in the</p> <p>15 police service?</p> <p>16 A. I joined the police in 1996, so it was 15 years.</p> <p>17 Q. How long had you been in the FRU, the Force Robbery</p> <p>18 Unit?</p> <p>19 A. I had been in for -- sorry, been in the Robbery Unit</p> <p>20 since April 2011.</p> <p>21 Q. So about six months?</p> <p>22 A. Yes.</p> <p>23 Q. Was that your first and only period in the Robbery Unit</p> <p>24 or had you done some previous service?</p> <p>25 A. No, that's the first time in that particular Robbery</p> <p style="text-align: center;">Page 3</p>
<p>1 Q. At tab 3, a witness statement dated 10 January 2013.</p> <p>2 A. Yes.</p> <p>3 Q. Do you have that?</p> <p>4 A. Yes.</p> <p>5 Q. Tab 4, a witness statement dated 21 May 2013.</p> <p>6 A. Yes.</p> <p>7 Q. Tab 5, a witness statement dated 5 March 2014.</p> <p>8 A. Yes.</p> <p>9 Q. Tab 6, a long witness statement, 24 pages, although</p> <p>10 I think it only in fact ends on 23, dated</p> <p>11 16 December 2014.</p> <p>12 A. Yes.</p> <p>13 Q. Those are your six witness statements; are the contents</p> <p>14 of those true to the best of your knowledge and belief?</p> <p>15 A. Yes, sir.</p> <p>16 Q. You also wrote, I think, four reports at the request of</p> <p>17 the IPCC. Could we look at those, please. Tab 8.</p> <p>18 A. Yes.</p> <p>19 Q. A report dated 25 May 2012.</p> <p>20 A. Yes.</p> <p>21 Q. Tab 9, a report dated 7 September 2012.</p> <p>22 A. Yes.</p> <p>23 Q. At tab 10, a report dated 9 July 2012.</p> <p>24 A. Sorry, what date was that?</p> <p>25 Q. 9 July 2012.</p> <p style="text-align: center;">Page 2</p>	<p>1 Unit, I had served in a robbery unit at Longsight Police</p> <p>2 Station, as well.</p> <p>3 Q. When was that?</p> <p>4 A. That was 1999.</p> <p>5 Q. Was that a divisional --</p> <p>6 A. It was a divisional robbery unit, yes.</p> <p>7 Q. -- type unit, rather than a force-wide one?</p> <p>8 A. Yes.</p> <p>9 Q. Can you tell us, in broad terms, when Operation Shire</p> <p>10 commenced?</p> <p>11 A. Yes, Operation Shire commenced under the operation name</p> <p>12 Shire on 3 October, and that was as a result of</p> <p>13 intelligence that had been received several days prior</p> <p>14 to that, where some intelligent development had been</p> <p>15 conducted and, at that point, it was decided that</p> <p>16 further work needed to be done.</p> <p>17 Q. I think if we look at some files, just to date the</p> <p>18 beginning of Operation Shire to start with.</p> <p>19 A. Yes.</p> <p>20 Q. Can we look, please, at K, which the usher will show</p> <p>21 you, at page 1085, please.</p> <p>22 Do you have 1085 there?</p> <p>23 A. Yes, I do.</p> <p>24 Q. I think that is the front page of a book in your name;</p> <p>25 is that right? A daybook in your name?</p> <p style="text-align: center;">Page 4</p>

1 **A. Yes.**
 2 Q. This is not, effectively, a daybook, is it, because on
 3 the top right you have written, "SOI instructions"?
 4 **A. SOI instructions, yes.**
 5 Q. Just tell the chairman, if you would, what the purpose
 6 of this book was.
 7 **A. Well, "SIO instructions", stands for senior**
 8 **investigating officer instructions. And in there, if**
 9 **you turn over a page, it explains the purpose of that.**
 10 **It is for recording what may be considered sensitive**
 11 **decisions around the operation.**
 12 Q. We are just using 1085 to ground the date, 3 October.
 13 **A. Yes.**
 14 Q. That was both when the operation started and the day
 15 that you made the first entry in the book; is that
 16 right?
 17 **A. Yes.**
 18 Q. Similarly, if we go to 1096 to start with, actually --
 19 **A. Yes.**
 20 Q. -- we can see your casebook being used in the more
 21 traditional way of making daily entries with a date, on
 22 1096, of 3 October.
 23 **A. Yes.**
 24 Q. And the first entry, on 3 October 2011, at 1097.
 25 **A. Yes.**

Page 5

1 Q. So that is the start date of the operation.
 2 **A. Yes.**
 3 Q. Can you tell us as to who was in the operational team
 4 and how they were organised, please?
 5 **A. Yes, that was myself, as the SIO, Detective Sergeant**
 6 **Deborah Hurst, she was the Deputy SIO.**
 7 Q. Just pausing at each stage, what are the
 8 responsibilities of the SIO?
 9 **A. As the senior investigating officer, I was responsible**
 10 **for setting the strategies of the operation, the tactics**
 11 **that we would be looking to deploy on the operation.**
 12 **Also, in terms of the staffing, any requests for other**
 13 **staffing that would be needed to support the operation,**
 14 **that would generally be my role.**
 15 Q. The Deputy SIO, DS Hurst, what were her
 16 responsibilities?
 17 **A. Well, if I was absent, she would fulfil my role but, in**
 18 **the main, her role was around actions on the operation.**
 19 **So any actions that were to be raised on the CLIO action**
 20 **management system, she would be responsible for that and**
 21 **for supervising the officers who were also going to be**
 22 **working on a day-to-day basis on the operation.**
 23 Q. You said that she was responsible for "raising actions"
 24 on CLIO. Just explain to the chairman what raising
 25 an action means.

Page 6

1 **A. Sorry. The CLIO action management system, it is**
 2 **a system of raising enquiries, actions that need to be**
 3 **done by the investigation team during the course of that**
 4 **operation.**
 5 Q. Do they come back and are they resulted --
 6 **A. Sorry, apologies. Yes, the actions would be allocated**
 7 **to an officer, and then an officer would reply to that**
 8 **action as to whatever enquiries they had conducted.**
 9 Q. Is it then signed off as completed or filed?
 10 **A. Yes.**
 11 Q. Is it like a more basic system of the HOLMES system that
 12 the chairman may be familiar with?
 13 **A. Sorry, yes, it is.**
 14 Q. You said she was responsible for raising actions,
 15 sometimes we can see, I think from CLIO, that she was
 16 responsible for completing actions herself. So she
 17 raises them, allocates them to herself and then
 18 completes them.
 19 **A. That's correct.**
 20 Q. How long had she been in the Robbery Unit?
 21 **A. You would have to ask her that, sir. I think she had**
 22 **been in there for a couple of years.**
 23 Q. Had she been in something called the Excalibur Unit
 24 before?
 25 **A. Debbie, I think, went into the Excalibur Unit after the**

Page 7

1 **Robbery Unit.**
 2 Q. Ie after this incident?
 3 **A. No, not after -- well, yes, some time after this**
 4 **incident.**
 5 Q. Who else was there, maybe the next down the line
 6 underneath DS Hurst?
 7 **A. Yes, certainly one of the pecking order, but the officer**
 8 **in the case was Detective Constable Talbot.**
 9 Q. What were the responsibilities of the officer in the
 10 case?
 11 **A. The officer in the case was responsible for case file**
 12 **preparation, if we got to that stage. He would also, on**
 13 **a daily basis, scan intelligence systems, do that on**
 14 **a day-to-day basis. General file preparation and just**
 15 **having an overview of the actual investigation. He**
 16 **would be the person, ultimately, if the case got to**
 17 **a prosecution, who would be preparing the file of**
 18 **evidence.**
 19 Q. Okay.
 20 You mentioned -- though we are going to come back to
 21 it in more detail in a moment -- that he had
 22 responsibility for -- I think you said scanning
 23 intelligence systems on a daily basis.
 24 **A. Yes.**
 25 Q. Which intelligence systems was he responsible for

Page 8

1 scanning?

2 **A. At that time, we had the COPU intelligence system.**

3 Q. Just explain to the chairman what COPU is, please.

4 **A. It is -- I think that is central --**

5 Q. Operational policing unit?

6 **A. That is the one, yes. That is a system where**

7 **intelligence would go into GMP intelligence system, into**

8 **intelligence unit, and then it would be -- at that point**

9 **it would then be disseminated to the appropriate team.**

10 **So, for example, at that time we were the Force Robbery**

11 **Unit, so we would have our own intelligence bin -- as we**

12 **referred to them -- and intelligence would drop into**

13 **that bin on a daily basis. So that would be scanned on**

14 **a daily basis.**

15 **We also, at that time, although I think it was in**

16 **its infancy at that time, had the OPUS system, which was**

17 **another intelligence system that replaced our old**

18 **system, which was called GMPics -- and which we still**

19 **actually have that system -- but he would also scan that**

20 **to see if there was any relevant intelligence on the**

21 **subjects that we were looking at, at that time.**

22 Q. Okay. What would he do with any intelligence that he

23 thought was, or might be, relevant as a result of his

24 scanning?

25 **A. We would talk about it. Just so you understand the lay**

Page 9

1 **out of how the teams were, there would be a bank of**

2 **desks, Debbie would sit at the head of the desk, and on**

3 **that table was Andrew Talbot, David Clark. I think**

4 **Gary Mills was on that table, as well. So the**

5 **information would be known within the investigation**

6 **team. I would also be made aware, sometimes it would be**

7 **by email but, then, ultimately, we created a chronology**

8 **document.**

9 Q. So you are saying that if he found something that was

10 relevant, he would talk about it because they were in

11 physical proximity to him?

12 **A. Yes.**

13 Q. That you might, if you -- your office was not there, was

14 it?

15 **A. Yes, sorry, my office was. I wasn't sat right next to**

16 **the team, but I was in close proximity. So, on**

17 **a day-to-day basis, over a cup of tea or whatever, first**

18 **thing in the morning, I would always go over to the**

19 **teams and we would discuss if there was any new**

20 **intelligence, that kind of thing and I would be made**

21 **aware.**

22 **So I am right at the kind of outset, depending what**

23 **the intelligence was, but certainly the COPU**

24 **intelligence. I would then take a copy of that.**

25 **I would print that off and I would keep a copy of**

Page 10

1 **whatever that COPU was.**

2 Q. You would print a copy of the COPU 5x5, would you?

3 **A. Yes. Yes, and then that would be locked away. I can**

4 **actually produce that for the court, if you wish. It is**

5 **date and time stamped.**

6 Q. What is date and time stamped?

7 **A. The COPU. The actual COPU intelligence log.**

8 Q. The one you printed off?

9 **A. Yes.**

10 Q. Maybe we will come back to that later, whether the

11 Inquiry needs to see that.

12 **A. Yes, sure.**

13 Q. You said it might be emailed to you.

14 **A. Yes.**

15 Q. What might be emailed to you?

16 **A. The COPU number could be emailed to me, or the actual**

17 **COPU could have been emailed to me. There would be**

18 **occasions when the Intelligence Coordination Unit would**

19 **actually email myself, direct.**

20 Q. Explain what the Intelligence Coordination Unit is.

21 **A. So within the Force Intelligence Bureau, there was**

22 **a number of departments. The Intelligence Coordination**

23 **Unit would collate -- in fact, it was their**

24 **responsibility for actually writing up or typing up**

25 **these COPUs, the 5x5s, and they would then disseminate**

Page 11

1 **them.**

2 Q. You are saying that sometimes they would email you

3 directly?

4 **A. Yes, yes they would.**

5 Q. What would determine whether they emailed you directly?

6 **A. Depends on the individual who was actually within that**

7 **unit. I suppose you would have to ask them whether they**

8 **wanted to email them direct or --**

9 Q. Depends on the person involved?

10 **A. Yes.**

11 Q. You were talking us through the personnel, and amongst

12 the people that you mentioned was, I think, DC Mills,

13 who you I think referred to as "Gary".

14 **A. Yes.**

15 Q. DC Mills, what were his responsibilities?

16 **A. Outside enquiries, I would say. He was -- Gary is very**

17 **good with ANPR, so he would do any research that needed**

18 **doing around the automatic number plate recognition.**

19 **Gary would also -- bearing in mind the team are on**

20 **a small bank of desks, it may be if Andy -- Andy is**

21 **Andrew Talbot -- if he had said --**

22 Q. Or Tolly sometimes?

23 **A. Tolly, as he would be referred to, yes. He may say,**

24 **"I will have a look at Mr Totton", for example, and then**

25 **Gary may well have a look at one of the Corkovics.**

Page 12

1 Q. Was he the exhibits officer?
 2 **A. He was the exhibits officer for the operation.**
 3 Q. Can you help us as to the identities of other members of
 4 the team? You have done yourself, DS Hurst, DC Talbot,
 5 DC Mills.
 6 **A. Yes, and DC Clark.**
 7 Q. What was DC Clark's responsibilities?
 8 **A. DC Clark multi-tasked. He was responsible for the**
 9 **intelligence chronology. He ended up being the**
 10 **disclosure officer and he also did the phones enquiries.**
 11 Q. You said, "He was responsible for the intelligence
 12 chronologies"?
 13 **A. Yes.**
 14 Q. What responsibility did he have for the intelligence
 15 chronology?
 16 **A. So between him and DS Hurst, they would update the**
 17 **intelligence chronology.**
 18 Q. Was that a responsibility of DC Talbot, at all?
 19 **A. Yes, I mean -- I understood, or thought that DC Talbot**
 20 **had access to that chronology document. It since**
 21 **transpires that he didn't actually have access.**
 22 Q. When did you learn that?
 23 **A. I don't know, but I have certainly --**
 24 Q. He told us last week that he didn't. Did you learn it
 25 as a result of some evidence given last week?

Page 13

1 **A. No. I think I gave a statement, if I could just have**
 2 **a look at my statements. I think I gave a statement**
 3 **a while ago to say that I believed that DC Talbot had**
 4 **access to it. Could I just have a look at my**
 5 **statements?**
 6 Q. Yes, tab 11, page 1. I don't think it is a statement,
 7 I think it is a report.
 8 Do you see tab 11?
 9 **A. Yes.**
 10 Q. The first page of the document, when you were being
 11 asked by the IPCC about the intelligence chronology.
 12 You say:
 13 "During the course of Operation Shire, a live
 14 chronological intelligence document was produced
 15 recording the intelligence received by the Force
 16 Intelligence Branch ..."
 17 **A. Yes.**
 18 Q. "... then disseminated to the operational team. This is
 19 a sensitive document that was only accessed by me, as
 20 the SIO, the Deputy SIO and the officer in the case."
 21 **A. Sorry, sir, you are mistaken, that is not the document**
 22 **I am talking about.**
 23 Q. Let's stick with the one I am interested in.
 24 **A. Yes.**
 25 Q. There you say the intelligence chronology was only

Page 14

1 accessed by:
 2 "Me, as the SIO, the Deputy SIO and the officer in
 3 the case."
 4 That is wrong, isn't it?
 5 **A. Yes.**
 6 Q. Why is it wrong?
 7 **A. I don't know why it is wrong, sir. I have put down**
 8 **there the OIC. What we would normally do on operation**
 9 **is have -- the OIC would have access to the**
 10 **intelligence. The intelligence chronology document, the**
 11 **actual password protecting had actually been set up by**
 12 **somebody else. It had not been set up by myself.**
 13 **Andrew would be -- Andrew Talbot -- would be aware of**
 14 **all of the intelligence. The fact that he wasn't is**
 15 **something that I have subsequently learnt.**
 16 Q. When did you learn it?
 17 **A. If I can just find --**
 18 Q. Yes, have a look at the statement that you want to look
 19 at. It might be that you are looking at tab 6, page 72.
 20 **A. I am just looking there now.**
 21 Q. Two paragraphs from the bottom.
 22 It says:
 23 "DC Talbot, the officer in the case, would also scan
 24 GMP intelligence systems for intelligence at regular
 25 times pretty much every day so that intelligence was not

Page 15

1 missed. This too would then be added to the
 2 intelligence chronology as the inquiry progressed."
 3 Is that what you are thinking of?
 4 **A. Yes.**
 5 Q. So that bit is wrong, insofar as it suggests DC Talbot
 6 added items to the intelligence chronology?
 7 **A. No, sir. Sir, that is the way you are reading it:**
 8 **"This too would then be added to the intelligence**
 9 **chronology as the inquiry progressed."**
 10 **If you read just up above, a couple of sentences, it**
 11 **actually says:**
 12 **"They would make both me and DS Deborah Hurst aware**
 13 **and we would then pass this to DC Clark, who would then**
 14 **update the intelligence chronology."**
 15 Q. I see. So it was DC Clark that did it?
 16 **A. And DS Hurst.**
 17 Q. But not DC Talbot?
 18 **A. No.**
 19 Q. Why was that?
 20 **A. Because he had not been given access to the document.**
 21 Q. Why was that?
 22 **A. I can't answer that question. I don't know why he was**
 23 **not given access to it.**
 24 Q. Whose decision would be it be?
 25 **A. For the password?**

Page 16

1 Q. Yes.

2 **A. DS Hurst. She actually set up the document.**

3 Q. Would there be a principled reason why the officer in

4 the case would not be given access to all the

5 intelligence?

6 **A. No. I mean, the reasons why DC Clark would have had to**

7 **have access is because the type of intelligence that was**

8 **going on there would often relate to the role that he**

9 **was conducting, which was phones officer. So there may**

10 **be information that comes, which he then needs to**

11 **respond to.**

12 All the intelligence was being shared with

13 **DC Talbot, in any case. He would be aware of the**

14 **intelligence on there, so there was no --**

15 Q. There was no good reason?

16 **A. -- reason that I was aware of. As I said, when I have**

17 **initially done that report, as you have said, I was**

18 **under the impression that he had access to it, because**

19 **there was no reason why he shouldn't.**

20 We would keep the intelligence tight. We would keep

21 it for a small group because there would be no need for

22 lots of other people to know that information.

23 Q. But, as the officer in the case, he should have been in

24 with the circle of trust?

25 **A. He was very much within the circle of trust. Yes, sir,**

Page 17

1 **you are quite correct.**

2 Q. You mentioned, a moment ago, date stamped copies of COPU

3 5x5 logs?

4 **A. Yes.**

5 Q. How were they date stamped?

6 **A. Because when you print them off on the COPU system, it**

7 **actually puts the dates, possibly the time, I am not**

8 **sure, but it does it on the bottom of the document.**

9 Q. So these were your own, effectively, personal set of

10 COPU logs?

11 **A. Well, yes. You say, "Personal", if somebody else would**

12 **have taken over -- so, for example, I think in November,**

13 **DI Fernandes took over from me. I went to Uganda to**

14 **work with street children for a short time, I**

15 **volunteered with a Christian charity. So whilst I was**

16 **there, he took on the role. So he would have access to**

17 **them too.**

18 Q. Anyone else have access to the COPU logs; that printed

19 set?

20 **A. DS Deborah Hurst would have access if she needed to have**

21 **access to them.**

22 Q. Where did you store them?

23 **A. In a locked cabinet within the office.**

24 Q. You say they are available now, are they?

25 **A. Yes.**

Page 18

1 Q. How many other operations were you working on at this

2 time, between October 2011 and March 2012?

3 **A. A dozen or so. That is kind of proactive, where you**

4 **are, you know, deploying surveillance, whether it be**

5 **a robbery investigation, kidnap investigation, a man**

6 **hunt. There was also reactive investigations.**

7 Q. Where there had been a robbery and you had to respond to

8 it?

9 **A. Yes, responding to it after. And also there was**

10 **an operation called Operation Adequate, which I think**

11 **was up to Operation Adequate 4, that had been running**

12 **for probably 12, 14 months, even when I first went into**

13 **the Robbery Unit. So we were still doing a lot of work**

14 **in relation to those types of job, as well.**

15 Q. What was -- tell me what Operation Adequate -- great

16 name for an operation -- what was that about?

17 **A. That was in relation to organised crime groups,**

18 **predominantly within the Salford area. Indeed, I think**

19 **Operation Adequate 3 -- I would have to check --**

20 **Operation Adequate 3 involved Paul Totton, who was the**

21 **brother of David Totton. He was convicted of an armed**

22 **robbery in the Leigh area which had taken place,**

23 **I think, in 2010.**

24 Q. The Operation Shire, what proportion, in general terms,

25 of your time did that take up? I know it would vary,

Page 19

1 you are going to say, from day-to-day.

2 **A. It did vary from day-to-day. As well as the kind of**

3 **operational work that I had ongoing, I was involved with**

4 **a communities against guns, gangs and knives project.**

5 **That took up quite a lot of my time.**

6 Q. Try and look at it the other way round; in general

7 terms, how much, on average, of your time were you

8 giving over to Operation Shire?

9 **A. It is very difficult to say, Mr Beer. In terms of being**

10 **precisely -- there might be some weeks where I give**

11 **50 per cent of my time. There might be some weeks where**

12 **it is 10 per cent of my time because I was involved in**

13 **something completely different. So it would be very**

14 **difficult to say over that period of time.**

15 Q. The officers that we have heard from so far said that

16 really this was all they were doing, save if a robbery

17 occurred.

18 **A. Yes, they wouldn't be appointed -- all the officers**

19 **within the Force Robbery Unit would be multi kind of**

20 **functional. They would work on other operations. So,**

21 **for example, DC Clark, he was actually the officer in**

22 **the case for Operation Adequate. So he was still doing**

23 **work in relation to Operation Adequate at the same time.**

24 **So the skills that we tend to share round was around**

25 **intelligence, phones, OIC -- that is just a name, three**

Page 20

1 **there, but the OIC, the officer in the case role, you**
 2 **would not tend to do the OIC role on more than one job**
 3 **at a time.**
 4 Q. So they would be devoting most of their time to
 5 Operation Shire; is that right?
 6 **A. A lot of their time, yes.**
 7 **I can actually add there though, there was a number**
 8 **of occasions -- and I think I have documented in my book**
 9 **on occasions where staff were taken off on other**
 10 **operations. Operation Woodchuck is one that comes to**
 11 **mind, and there were other occasions when staff would be**
 12 **taken.**
 13 Q. I think we see in your book where they were abstracted
 14 for other duties, but the presumption is they were
 15 working on this.
 16 **A. Sorry.**
 17 Q. The presumption is they were working on this.
 18 **A. I think it is an unfair presumption, because they were**
 19 **working on other things at the time. It was not just**
 20 **this.**
 21 **The OIC, yes, complete responsibility and the major**
 22 **part of his time would be on this, but there were**
 23 **a number of occasions -- because of the role that we**
 24 **did, certainly, if we had any kidnaps, the officers**
 25 **would go immediately be taken immediately on to that**

Page 21

1 **investigation, because of the nature of it being a crime**
 2 **in action.**
 3 Q. One of the first things I think you did was to prepare
 4 an investigative assessment; is that right?
 5 **A. I did that on 15 October.**
 6 Q. So it was one of the first things that you did?
 7 **A. No, it wasn't.**
 8 Q. What was the first thing you did then? Let's do it that
 9 way round.
 10 **A. Yes. I started the -- my policy books in relation to**
 11 **Operation Shire.**
 12 Q. We have looked at those.
 13 **A. Yes. The investigative assessment has to be completed**
 14 **before we put more mobile surveillance out, and the way**
 15 **that it is done now, we actual don't actually use that**
 16 **document anymore. We use the organisational review**
 17 **document.**
 18 Q. I know you are very, very keen -- it is very apparent
 19 already -- to speak.
 20 **A. You are asking me questions, I am just trying to answer,**
 21 **sir.**
 22 Q. I think you are answering a different question there.
 23 I think you are telling me what you do now, which
 24 I didn't ask about; do you understand?
 25 **A. Okay, there was relevance to that, sir.**

Page 22

1 Q. Hold on, hold on. Do you understand; I didn't ask what
 2 document you used now?
 3 **A. The relevance to that, sir, was that the investigative**
 4 **assessment --**
 5 Q. You go on.
 6 **A. -- that we do -- that we did at the time, we now do**
 7 **an organisational review. The organisational review now**
 8 **is done before an operation commences.**
 9 **At the time, when we did the investigative**
 10 **assessment, providing that was done prior to the**
 11 **deployment of mobile surveillance, then that was**
 12 **absolutely fine.**
 13 Q. One of the first things that you did was the
 14 investigative assessment; is that right?
 15 **A. No, sir.**
 16 Q. Okay. Tell me all of the things that you did before you
 17 came to the investigative assessment then.
 18 **A. If I can just go through my book, sir?**
 19 Q. Yes, absolutely.
 20 (Pause)
 21 **A. So there was a number of intelligence logs that we**
 22 **received.**
 23 Q. Yes. Which page are you looking at?
 24 **A. Sorry, I've got my actual books here, in front of me.**
 25 Q. We have it in K, which I think we should have out, and

Page 23

1 it starts at 1096, your casebook.
 2 **A. Yes. Okay.**
 3 **I see the point that you are coming to, sir, because**
 4 **there is an entry on 3 October, which says:**
 5 **"The objectives of the operation are as outlined on**
 6 **my IA."**
 7 **I know that was not completed until 15 October. So**
 8 **I may have commenced the IA, but I certainly did not**
 9 **complete it until 15 October.**
 10 Q. I didn't say that. I asked you one of the first things
 11 you did was to prepare an IA?
 12 **A. And I am telling you, sir, it wasn't.**
 13 Q. What did you do before you prepared the IA?
 14 **A. In relation to the operation, I had received**
 15 **intelligence. I had got an operation name for the**
 16 **investigation, which takes a couple of days to get that**
 17 **through the Force Intelligence Branch. I had looked at**
 18 **the resources that were available to me to be able to**
 19 **use on the operation, looked at what the other demands**
 20 **were of the unit, to balance out if we had the capacity**
 21 **to be able to deal with the investigation; spoke to**
 22 **Detective Sergeant Hurst in relation obtaining a**
 23 **surveillance authority. She would have then spoken to**
 24 **Detective Constable Talbot in relation to what**
 25 **information needed to go on there. There would have**

Page 24

1 **been a process of submitting that to the Detective**
 2 **Superintendent, Detective Superintendent Duddridge, that**
 3 **would have had to have been completed. And that went**
 4 **through a process of initial submission, by the DC to**
 5 **the DS.**
 6 **The DS then submits that through to the Detective**
 7 **Superintendent, and then the Detective Superintendent**
 8 **would then decide whether or not that was going to be**
 9 **authorised.**
 10 **Following on from that, there was a period where**
 11 **I think we did some observations, static observations.**
 12 **So there would have been intelligence cribs created that**
 13 **would have been needed to be created for the staff to**
 14 **deploy. We would have had to book out vehicles that**
 15 **would be used for -- technical vehicles to be used for**
 16 **surveillance.**
 17 Q. If you look at page 1097.
 18 **A. Yes?**
 19 Q. The entry for 3 October.
 20 **A. Yes.**
 21 Q. About 10 lines up from the bottom, it says:
 22 "The objectives of the operation are outlined on my
 23 IA."
 24 That stands for investigative assessment?
 25 **A. Yes, sir.**

Page 25

1 Q. Does it follow that you had started the investigative
 2 assessment on the 3rd?
 3 **A. It does follow, the start of it, yes.**
 4 Q. One of first things you did was to prepare an
 5 investigative assessment?
 6 **A. But it was not completed until 15 October.**
 7 Q. I hadn't ask that question. All I said was: one of the
 8 first things you did was to prepare an investigative
 9 assessment; is the answer to that, "Yes"?
 10 **A. In that case then, yes. The answer is, "Yes".**
 11 Q. That was easy, wasn't it?
 12 **A. Very easy, sir.**
 13 Q. Can we look at the investigative assessment, please? It
 14 is file F, page 1.
 15 Is this the investigative assessment that you
 16 completed, on 15 October?
 17 **A. Yes, sir. 10.30, on 15 October.**
 18 Q. Can you just tell us, in broad terms, what the purpose
 19 of an investigative assessment is?
 20 **A. It will give the objectives of the operation, the**
 21 **resource that you are going to be using, the tactics**
 22 **that you are going to be using during the course of the**
 23 **operation. And then, at the end of it, it is decided by**
 24 **the senior officer if it is authorised or not.**
 25 Q. The "it", whether it is authorised; does that mean all

Page 26

1 the little component parts are approved?
 2 **A. You would have to speak to the authorising officers for**
 3 **that, that is something that they take into**
 4 **consideration.**
 5 Q. I mean, do they ever come back and say, "Hold on,
 6 I don't think you have written out a proper surveillance
 7 strategy" or "I think you should consider X or Y"?
 8 **A. No, bearing in mind I have been doing these probably for**
 9 **seven years, I have never had somebody come back to me**
 10 **to say that they wanted me to put something extra in**
 11 **there.**
 12 Q. Right, so you tend to get approval or not?
 13 **A. Yes.**
 14 Q. Now, if we look at page 1 of the document, we can see
 15 that the operational objectives, which is what you had
 16 referred to in your note of 3 October; yes?
 17 **A. Yes.**
 18 Q. Are set out:
 19 "(1) To protect the community and, in particular,
 20 members of the financial industry from physical harm and
 21 loss caused by the subjects."
 22 **A. Yes.**
 23 Q. "(2) To obtain evidence of the involvement in serious
 24 criminality by the subjects, leading to their arrest and
 25 conviction."

Page 27

1 **A. Yes.**
 2 Q. And:
 3 "(3) To seek recovery of assets from the subjects
 4 that has been gained through crime."
 5 **A. Yes.**
 6 Q. The subjects there, that refers to the two subjects
 7 listed in the box, in the middle of the page, namely
 8 Aaron Corkovic, AKA Brady, and David Totton?
 9 **A. Yes.**
 10 Q. The second operational objective there is:
 11 "To obtain evidence of the involvement of serious
 12 criminality by the subjects."
 13 Is that deliberately worded so as not to be focused
 14 on just robbery?
 15 **A. Yes. Clearly, if during the course of any operation, if**
 16 **there was evidence of another kind, where the risk could**
 17 **be diminished by arresting that person, and it would not**
 18 **be compromising an investigation or covert tactics, then**
 19 **that would be done. And it is something that I have**
 20 **done previously on teams who have been looking at --**
 21 **Operation Bulmer was a robbery team we were looking at.**
 22 **Intelligence was received in relation to another**
 23 **activity, where I seized an opportunity to arrest all**
 24 **subjects, but it was not my original -- the reason the**
 25 **operation had originally started was in relation to**

Page 28

1 robbery.

2 Q. Do we see a reflection of that, over the page, on

3 page 2, under box 5, "The tactical options", under the

4 subheading, "Investigation strategy"?

5 A. **"So the consideration for the allocation ..."**

6 **Is that the point you are on, sir, sorry?**

7 Q. No, under the heading, "Investigation strategy".

8 A. Yes.

9 Q. It says -- I think there is a 1 missing or may be it has

10 been cut off by the hole-punch?

11 A. Sorry, yes, sir.

12 Q. "The proactive targeting of the subject is in relation

13 to serious crime. However, if the opportunity arises

14 for a less serious offence, this will be considered if

15 it is thought it is necessary to disrupt serious

16 criminality where an arrest is not feasible."

17 A. Yes.

18 Q. What determines if you arrest for less serious

19 criminality, ie "other than serious criminality" in

20 order to disrupt?

21 A. Well, it would take each case on its merits, but it

22 would depend on a number of different circumstances.

23 So, for example, if there was tactics -- covert

24 tactics being used, that would have been to be taken

25 into consideration. We would never stand in the way, in

Page 29

1 terms of not arresting, but you have to take into

2 consideration that the reason why a covert operation,

3 a proactive operation has been authorised is because it

4 has been deemed that these people had been perhaps

5 subject to less intrusive investigations in the past

6 which were not successful and that it is necessary to do

7 a proactive operation where covert tactics are used.

8 You wouldn't use them on the every day person on the

9 street.

10 Q. So, on the previous page, we were looking at obtaining

11 evidence of the involvement of the subjects in serious

12 criminality leading to arrest and conviction.

13 A. Yes.

14 Q. This is saying: if the opportunity arises for a less

15 serious offence, this will be considered if it is

16 thought necessary to disrupt.

17 A. Yes.

18 Q. It says that you will give consideration to it, which is

19 obviously the right thing to do, but what are the

20 parameters as to whether or not you do make an arrest

21 for a less serious offence?

22 A. It is -- as I said, it depends on each case. It is

23 different on every investigation.

24 Q. What are the parameters?

25 A. Clearly, if it is a serious offence, somebody is going

Page 30

1 to be arrested straight away.

2 Q. We are talking necessarily about less serious offences.

3 A. If it is a section 5 public order, for example, that is

4 witnessed by a surveillance team, you might not

5 necessarily want to use a load of surveillance officers'

6 evidence and then reveal the fact that you have deployed

7 a surveillance team, in essence, where somebody would

8 ultimately get a fine or not necessarily get a custodial

9 sentence, but you would be making criminals aware then

10 of different tactics that you were deploying.

11 Q. This talks about making an arrest in order to disrupt.

12 A. Yes.

13 Q. Doesn't it?

14 A. Yes, to disrupt. So, for example, on any kind of

15 investigation, you may get a threat to life scenario.

16 And, in fact, I think I do make reference in one of my

17 books in relation to being contacted by Mr Millett.

18 I wonder if I could just look in my daybooks for

19 a second because, obviously, it is relevant to the

20 question that you are asking?

21 Q. Is this about a fraud?

22 A. Yes. So there had been some heightened tensions and

23 incidents within the Salford area. Then, on 10 February

24 2012 -- sorry, I will find the right page for you, sir.

25 (Pause)

Page 31

1 It is at page 1220 of bundle K.

2 Q. Yes.

3 A. So if you see, I have been contacted by

4 Superintendent Millett, and this was in relation to race

5 tensions; okay? It is probably --

6 Q. You are looking at the end of 03.15; is that right?

7 A. Yes, but it is probably in the book previous, actually,

8 where it may actually start, this.

9 Yes, sorry. It is actually the book previous. It

10 is on page 100 of mine, which is 1217.

11 Q. 1217?

12 A. Yes, 1217. Entry at 09.10.

13 Q. This is DCI Millett, rather than superintendent?

14 A. Yes, he retired as a superintendent.

15 "Speak to DCI Millett."

16 Am I okay reading this out in --

17 Q. Yes.

18 A. "Intel suggests AC and MC have been involved in

19 an incident in Bury. AC and MC to be arrested."

20 That was in relation to a firearms incident. That

21 had taken place in Salford. There was obviously risk

22 attached to that.

23 Q. Again, I know you are very keen to take us through parts

24 of your book. All I was trying to understand was

25 whether there were any broad parameters by which you

Page 32

1 would consider an arrest for, in the words of the
 2 investigation strategy, "Less serious criminality"?

3 **A. Yes, sorry, the point being is there was a risk there.**
 4 **There was a fraud investigation outstanding, so**
 5 **a decision was taken to arrest for the fraud. So those**
 6 **are the kind of incidents that may arise where there is**
 7 **an opportunity, yes.**

8 Q. Are there any broad parameters that you consider when
 9 deciding whether to arrest for less serious criminality?

10 **A. No, I don't really understand the question that you are**
 11 **asking me there, sir.**

12 **I have tried to explain, if you treat each case on**
 13 **its own merits, it depends what happens during the**
 14 **course of that investigation. If you can point me**
 15 **specifically to something that you are thinking of,**
 16 **I will certainly try and answer the question for you.**

17 Q. Do you say, for example, "Let's look at the seriousness
 18 of the less serious criminality, whether it would likely
 19 result in a custodial sentence or not"?

20 **A. I would say, in the majority of cases, yes, but there**
 21 **are occasions where if it is an immediate risk, if there**
 22 **is a threat to life – bearing in mind prior to this**
 23 **role I was in Excalibur, the gun and gang unit, so we**
 24 **had to do these kind of interventions on a day by day**
 25 **basis and, on occasions, it would be for the lesser**

Page 33

1 **offences. So the fraud, for example, there, it is**
 2 **a lesser offence. There is a really good chance that**
 3 **somebody isn't going to go to prison for that, but there**
 4 **are occasions when you have to do that.**

5 Q. I had in mind, if you look at file 80.

6 **A. Yes.**

7 Q. This is part, I think, of the organisational review
 8 document.

9 **A. Yes.**

10 Q. Updated on 15 February 2012.

11 **A. Yes.**

12 Q. If you look, on page 80, at the last entry, in the
 13 middle part of the document.

14 **A. Yes.**

15 Q. "CPS have been liaised with, Nicky Moore, and at this
 16 stage at this stage advice has been given that there is
 17 insufficient evidence to support a charge for conspiracy
 18 to rob. Consideration has been given to arrest the
 19 subject for any substantive offence that would lead to
 20 a custodial sentence, but this time an opportunity has
 21 not arisen to explore this avenue."
 22 Did you write that, by the way?

23 **A. Yes.**

24 Q. That might tend to suggest that a relevant parameter
 25 that you had in mind for an offence, falling short of

Page 34

1 conspiracy to rob, would be whether the offence would be
 2 likely to lead to a custodial sentence.

3 **A. Not definitely, sir. If circumstances had dictated**
 4 **where a need to intervene. So, for example, there was**
 5 **a period of time where Mr Totton was disqualified from**
 6 **driving by means of – I think it was a totting up**
 7 **procedure. If something would have come along where we**
 8 **needed to intervene, to put something along the lines of**
 9 **what happened with the Corkovics, then that would have**
 10 **happened and I would have instructed my staff to do**
 11 **that, or I would have got another unit to do that on our**
 12 **behalf.**

13 Q. So the fact that this was mentioning, here,
 14 consideration being given to any substantive offence
 15 that would lead to a custodial sentence, does not mean
 16 that you were only looking at that?

17 **A. No.**

18 Q. You would, if the circumstances dictated it, go right
 19 down to a section 5 public order?

20 **A. If there was a threat to life or it was those kinds of**
 21 **situations, yes.**

22 Q. Or indeed a need to disrupt a planned robbery, whether
 23 or not that involved a threat to life?

24 **A. If it was deemed that that was what was needed to do.**

25 Q. But when you say, "It was deemed that"?

Page 35

1 **A. It would be needed to do at the time.**

2 Q. That means you deeming it, does it?

3 **A. I am the senior investigating officer.**

4 Q. It is just the "It" being deemed tended to refer to
 5 somebody else making the decision. You deeming it; is
 6 that right?

7 **A. If I deemed, based on whatever is happening – we are**
 8 **talking hypothetically about hypothetical things. It is**
 9 **very difficult to kind of put it in any kind of context.**

10 Q. That is all I am doing at the moment.

11 **A. If there was a situation – I have mentioned threat to**
 12 **life as one – where it was needed to be done, and the**
 13 **subjects were not under control for whatever reason,**
 14 **then it would have been considered.**

15 Q. Did Operation Shire target the subjects for offences
 16 other than robbery?

17 **A. There was certainly intelligence which suggested that**
 18 **some of the subjects were involved in drug supply, but**
 19 **that was not borne out on surveillance.**

20 Q. What was not borne out on surveillance?

21 **A. In terms of seeing transactions and drugs packages being**
 22 **exchanged, et cetera, et cetera.**

23 Q. What consideration did you give to arresting any of the
 24 subjects for supplying drugs?

25 **A. Well, we had no evidence of that, so we couldn't do**

Page 36

1 **that, unfortunately.**
 2 Q. So the answer is that you did give it consideration but
 3 decided not to because there was not sufficient
 4 evidence?
 5 **A. Yes, I mean, these types of scenarios, happen all the**
 6 **time. I think I just alluded to one there where,**
 7 **Operation Bulmer, which was a robbery investigation**
 8 **where an opportunity came to arrest in respect of drugs**
 9 **offences. We took that opportunity and the primary**
 10 **subject was arrested, and I think got an eight or nine**
 11 **year sentence. I would have done exactly the same thing**
 12 **had that opportunity arisen.**
 13 Q. Can we go back then, to file F1, the investigative
 14 assessment, please.
 15 On page 2, under, "Intelligence strategy", you say:
 16 "Making the best use of the intelligence is vital to
 17 the investigation."
 18 **A. Yes.**
 19 Q. "A nominated single point of contact has been identified
 20 within the Force Intelligence Branch to manage the
 21 intelligence flow. DC Simon Lapniewski, he will also
 22 facilitate any overt inquiries required by the
 23 operational team to protect the covert nature of the
 24 investigation."
 25 **A. Yes.**

Page 37

1 Q. Firstly, who nominated DC Lapniewski?
 2 **A. It was possibly Ann Buckley. I don't know how their**
 3 **tasking process worked, but --**
 4 Q. So he was nominated to you?
 5 **A. Yes. We had asked for --**
 6 Q. You had asked for a SPOC?
 7 **A. We had asked for somebody and, at the time, the FIB were**
 8 **going through a restructure and there had been --**
 9 **I would say a disconnect between the Force Intelligence**
 10 **Bureau and, certainly, within the serious and organised**
 11 **crime group. So --**
 12 Q. What do you mean "a disconnect"?
 13 **A. In terms of their role, one of their roles was to**
 14 **actually develop intelligence, do some preparatory**
 15 **observations, and then hand it to the Robbery Unit as**
 16 **a kind of: this has already started. We are off and**
 17 **running. Now over to you to carry it on.**
 18 **It was not happening and we was trying to kind of**
 19 **build some bridges, so I had had a discussion with --**
 20 **I think it was Ann Buckley was the DI at the time, and**
 21 **she wanted her staff to be more involved in terms of**
 22 **when we commenced operations. So, when we first**
 23 **started, right at the start of Operation Shire, which**
 24 **would have been the start of October, Simon came to**
 25 **a meeting with myself, Debbie Hurst and I think**

Page 38

1 **Andrew Talbot was there, where he got a flavour of what**
 2 **the operation was. The reason behind this was the FIB**
 3 **had an impression that we were using them purely as**
 4 **an administrative process, ie we asked for**
 5 **an intelligence profile. We get the profile, and they**
 6 **never knew anything about what, kind of, was happening,**
 7 **so that is why Simon was appointed.**
 8 Q. So he was actually present at the meeting at which he
 9 was appointed a single point of contact?
 10 **A. He was not -- he was told to come to the meeting as the**
 11 **SPOC. He wouldn't have come if he was not the SPOC, it**
 12 **would have been somebody else.**
 13 Q. He would have been under no doubt --
 14 **A. There was not some grand ceremony where I kind of said**
 15 **to him -- I had been asked for a SPOC. I had asked**
 16 **Ann Buckley for a SPOC, and she had, either through**
 17 **Russ Kelly, or whoever was her supervisor, or if she had**
 18 **spoken to him direct, I don't know. But he was aware,**
 19 **and it would have been slightly unusual for him because**
 20 **it is not something that we had done massively**
 21 **previously.**
 22 **I had done it on a prior operation,**
 23 **Operation Dareton, with a lady called DC Karen James,**
 24 **and we had been really successful with that, where we**
 25 **had arrested an armed robbery team. She had started**

Page 39

1 **the operation, and we had arrested an armed robbery**
 2 **team, and she had seen it all the way from the start,**
 3 **all the way through.**
 4 Q. So he would have been under no doubt that he was the
 5 single point of contact, having attended this meeting?
 6 **A. It would have been -- forget about the meeting, he would**
 7 **have been aware about that prior to attending the**
 8 **meeting because he had been asked to attend for**
 9 **a reason.**
 10 Q. You see, we have heard from him and he said he didn't
 11 know that he was the SPOC.
 12 **A. I have read the transcript. He thought he was the POC.**
 13 Q. Sorry?
 14 **A. He thought he was the POC.**
 15 Q. Yes, a point of contact. If time allowed, and
 16 circumstances permitted it. You say that is wrong, he
 17 was the single point of contact?
 18 **A. Yes, at the start of the operation, he was the single**
 19 **point of contact.**
 20 **As it transpired through the operation -- as I think**
 21 **I just mentioned -- they were going through**
 22 **a restructure, the Force Intelligence Branch, and they**
 23 **had lost some staff and as the intelligence progressed,**
 24 **we had had to rely on other people within that unit. So**
 25 **it is best laid plans, but he was absolutely the SPOC,**

Page 40

<p>1 right at the start of the investigation.</p> <p>2 Q. You say, in your paragraph 10, here, that:</p> <p>3 "DC Lapniewski has been identified to manage, the</p> <p>4 intelligence flow."</p> <p>5 A. Yes.</p> <p>6 Q. What did you mean by "Manage the intelligence flow"?</p> <p>7 A. He would have direct contact with the Intelligence</p> <p>8 Coordination Unit.</p> <p>9 Q. Just to be clear, he was in the intelligence development</p> <p>10 section?</p> <p>11 A. Yes.</p> <p>12 Q. So he would have direct contact with another part of</p> <p>13 FIB?</p> <p>14 A. Yes, they sat side by side.</p> <p>15 Q. Yes.</p> <p>16 A. So when a 5x5 intelligence log would come in, he could</p> <p>17 signpost them to Operation Shire.</p> <p>18 Q. So what does "manage the intelligence flow" mean?</p> <p>19 A. That is probably a rather -- basically, saying to his</p> <p>20 mate, who was working on the intelligence in the ICU,</p> <p>21 saying, "That intelligence that you have got there, it</p> <p>22 relates to Operation Shire, can you send it down to</p> <p>23 him".</p> <p>24 Q. So it is: manage the intelligence flow in the FIB?</p> <p>25 A. Yes, make sure it goes to the right people.</p> <p style="text-align: center;">Page 41</p>	<p>1 police and community concerns. That is the first P,</p> <p>2 isn't it?</p> <p>3 A. Yes.</p> <p>4 Q. The next heading is, "Physical harm"; that is the second</p> <p>5 P?</p> <p>6 A. Yes.</p> <p>7 Q. Then, the third P is psychological risks, on page 8.</p> <p>8 A. Yes.</p> <p>9 Q. That is the next heading, isn't it?</p> <p>10 A. Yes.</p> <p>11 Q. Then, legal risks, on page 8.</p> <p>12 A. Yes.</p> <p>13 Q. Economic risk, on page 9, and then moral risk and</p> <p>14 ethical risks, on page 9; yes?</p> <p>15 A. Yes.</p> <p>16 Q. And you score them as to the probability of the event</p> <p>17 happening. The impact on a low, medium and high scale,</p> <p>18 and then give it a score, a combined score; is that</p> <p>19 right?</p> <p>20 A. Yes.</p> <p>21 Q. Then, in the right-hand column, you set out what control</p> <p>22 measures you propose to take in order to eliminate, or</p> <p>23 if not possible, to minimise the risk; is that right?</p> <p>24 A. Yes. Yes.</p> <p>25 Q. Can I just look at physical harm, the second P.</p> <p style="text-align: center;">Page 43</p>
<p>1 What you don't want, when you start one of these</p> <p>2 operations, is that the intelligence -- because if the</p> <p>3 intelligence comes on an individual, so say it came on</p> <p>4 Mr Corkovic, you don't want that sending to the Salford</p> <p>5 division and somebody starting doing work around that</p> <p>6 when we are already doing covert work in the background.</p> <p>7 Q. I think you also prepared an operational risk</p> <p>8 assessment; is that right?</p> <p>9 A. Yes.</p> <p>10 Q. I am not going to ask you whether it was one of the</p> <p>11 first things you did, just to save time. If we could</p> <p>12 look at it, please, at page 6.</p> <p>13 A. Yes.</p> <p>14 Q. Can you tell us what the purpose of the document is,</p> <p>15 please? So we are on F6 to 10, please.</p> <p>16 A. It is a risk assessment document in terms of anything</p> <p>17 that we can perceive, anything I can perceive at that</p> <p>18 point in time, that is potentially a risk to</p> <p>19 individuals, to intelligence, to GMP, if intelligence is</p> <p>20 compromised and it is a means of recording on there, and</p> <p>21 there is a scoring system that goes with the risk</p> <p>22 measures.</p> <p>23 Q. Is this prepared according to the 3Ps LEM model?</p> <p>24 A. Yes, it is.</p> <p>25 Q. Looking at what the 3Ps are, they start, on page 6, with</p> <p style="text-align: center;">Page 42</p>	<p>1 A. Yes.</p> <p>2 Q. I think the template document says:</p> <p>3 "Eg risk of personal harm to the public, law</p> <p>4 enforcement operatives or subjects."</p> <p>5 A. Yes.</p> <p>6 Q. So that is pre-populated, that, the eg in each case;</p> <p>7 yes?</p> <p>8 A. I am not sure if it is, I would have to go back and have</p> <p>9 a look. I had done the training course for this,</p> <p>10 I think probably in 2009 or 2010. There was nominated</p> <p>11 people who got trained by our force OPSY, so I had had</p> <p>12 some training which was a lot fresher in the mind then</p> <p>13 than it is now.</p> <p>14 Q. Okay, I see -- whether the eggs are populated?</p> <p>15 A. -- are populated or not, I don't know.</p> <p>16 Q. Let's just look. It looks like it is looking at three</p> <p>17 groups there, harm to the public, harm to law</p> <p>18 enforcement operatives or harm to the subjects.</p> <p>19 A. Yes.</p> <p>20 Q. Then if we can see what you then write about that.</p> <p>21 A. Yes.</p> <p>22 Q. Over the page, to page 7, you say:</p> <p>23 "The risk to the general public from the OCG's</p> <p>24 criminal activity is potentially medium to high due to</p> <p>25 the nature of the offences that the subjects of the</p> <p style="text-align: center;">Page 44</p>

1 operation are believed to be involved in."
 2 THE CHAIRMAN: Do you have that? You may have the wrong
 3 page number.
 4 **A. I did, yes.**
 5 THE CHAIRMAN: It is page 2 of the document, and page 7 of
 6 the bundle.
 7 **A. Thank you, sir.**
 8 **Sorry, if you could say that again.**
 9 MR BEER: Top of page 7:
 10 "The risk to the general public from the OCG's
 11 criminal activity is potentially medium to high due to
 12 the nature of the offences that the subjects of this
 13 operation are believed to be involved in; burglary,
 14 robbery, theft of motor vehicle and their previous use
 15 of firearms. There is intelligence to suggest that the
 16 subjects are currently in dispute with opposing OCGs but
 17 this is being managed under a separate operation."
 18 And then:
 19 "Risk to GMP staff, risk of injury through
 20 operational duties, eg conducting arrest, surveillance,
 21 use of observations posts, CROPS deployments."
 22 Yes?
 23 And then, at the foot of the page:
 24 "Risk of injury from the targets of the operation."
 25 And then, over the page, before we move to

Page 45

1 psychological risk:
 2 "Direct threats to investigators due to their
 3 involvement in the inquiry."
 4 I was just looking for a box that said: what about
 5 the risk of harm to the subjects?
 6 **A. There is not a separate box for that, sir.**
 7 Q. Did you consider that issue?
 8 **A. Yes, sir.**
 9 Q. Why is there not a box concerning it?
 10 **A. I can't, sir -- and obviously it is not alluded to on**
 11 **there. I know or I believe that in other areas of my**
 12 **books I have alluded to manner of driving and whether**
 13 **that is -- puts the subjects at danger, the public,**
 14 **subject and police officers. So it is not articulated**
 15 **there, as you have clearly just read out, but it was**
 16 **a consideration.**
 17 Q. If it was said to you that, on the face of this
 18 document, you are only concerned about the public and
 19 police officers, but not the subjects; what would you
 20 say about that?
 21 **A. I would say that is incorrect, because at any point when**
 22 **we would be going to an arrest phase, there would be**
 23 **a risk assessment conducted at that point. If it is in**
 24 **relation to the driving, the manner of driving, then**
 25 **that would also be considered and articulated.**

Page 46

1 **But, certainly, when you get to the arrest phase of**
 2 **an operation, that would be documented.**
 3 Q. In --
 4 **A. Or be assessed, sorry, by the appropriate people.**
 5 Q. We can put that file away now.
 6 **A. Yes.**
 7 Q. I am talking about things in very general terms --
 8 **A. Sorry, can I just raise something? When I was answering**
 9 **a question, the gentleman, second to the end, was**
 10 **shaking his head. It was a little bit off putting for**
 11 **me. I would just like to raise that. On the same row**
 12 **as yourself, the gentleman second from the end. I just**
 13 **wanted to raise that with you, sir.**
 14 THE CHAIRMAN: I am sure people will make sure they don't
 15 put witnesses off by the way they behave.
 16 **A. Thank you, sir.**
 17 MR BEER: I am talking about things in general terms, at the
 18 moment.
 19 **A. Yes, sir.**
 20 Q. I will be doing so for most of today, not proceeding to
 21 specifics until tomorrow, I suspect.
 22 What responsibility did you have in respect of
 23 obtaining and assessing intelligence upon which the
 24 following three things were based: firstly, the tactical
 25 firearms unit threat assessments?

Page 47

1 **A. Sorry, what training had I had?**
 2 Q. I didn't mention the word "training".
 3 What responsibility did you have in relation to
 4 obtaining and then assessing information or intelligence
 5 upon which the TFU threat assessments were based?
 6 **A. Well, I would present the intelligence information to**
 7 **the tactical firearms commander, if that is where we are**
 8 **going, and plainly we did on this investigation.**
 9 Q. So significant responsibility you would have, or total
 10 responsibility for the provision of information?
 11 **A. No, in relation to the -- if you could be a bit more**
 12 **specific in terms of -- are we looking at profiles? Are**
 13 **we looking at the OPUS records? Are we looking at crime**
 14 **reports? What area are we looking at?**
 15 Q. At the moment, I am looking at the whole thing to see
 16 whether you had responsibility for the provision of
 17 information to them upon which their threat assessment
 18 was based.
 19 **A. I would say I had access to the information.**
 20 Q. Whose responsibility was it to present it to them?
 21 **A. To the TFCs, it would be myself or, if I was absent, it**
 22 **would be Detective Sergeant Hurst.**
 23 Q. So they relied on you to provide them with the
 24 intelligence on which their threat assessment was based?
 25 **A. They would have a briefing from myself but, in terms of**

Page 48

<p>1 the actual briefing, they have their own staff that 2 would also conduct research -- 3 Q. I am not talking about who conducts the briefing, at the 4 moment. 5 A. Sorry. 6 Q. You went, I think, on to say there that they have their 7 own staff that conduct their own research? 8 A. The staff would -- once I had presented a briefing, they 9 have staff who would prepare the electronic briefing. 10 That was nothing to do with me. 11 So once they know who the subjects are, they would 12 have the opportunity to -- whilst they are preparing 13 their briefing -- look at the OPUS records or to look at 14 the PNC, if they decided that is what they wanted to 15 look at. 16 Q. Right. So you would have primary responsibility for 17 providing them with the initial intelligence case -- 18 A. Yes. 19 Q. -- and then they would have the opportunity to conduct 20 their own research? 21 A. Yes, but their research wouldn't be based on anything 22 from surveillance, for example, because -- 23 Q. They are not party to it. 24 A. They are not party to it there, until they have had the 25 briefing, perhaps from the surveillance team leader, who</p> <p style="text-align: center;">Page 49</p>	<p>1 then it was down to the TFU to conduct their own 2 research? 3 A. No, no. It is -- no, but I know they would do that 4 because I had been in rooms when they was preparing the 5 actual electronic briefings, and I had seen -- they 6 would go on and they would look on OPUS, or whatever it 7 is. I have not sat there with them while they have done 8 it, but I know that is -- and, to be fair, as police 9 officers, that is probably a fairly natural thing to do. 10 Q. Did that happen on this occasion? 11 A. On which? 12 Q. 3 March? 13 A. I don't know if it did on that particular occasion. 14 Q. Do you know why they would be doing that? If you have 15 given them a full briefing on the intelligence, as the 16 SIO that had been living and breathing this job for four 17 and a half months -- 18 A. Yes. 19 Q. -- why would they be going off and checking on the PNC? 20 A. Maybe not necessarily the PNC, on OPUS. I don't know, 21 if there is anything on there that might be relevant to 22 them that has not been relevant in my briefing. I don't 23 know. I suppose you would have to ask the people who 24 actually prepare those briefings. I can't answer for 25 them.</p> <p style="text-align: center;">Page 51</p>
<p>1 I would ordinarily take in with me on briefings to 2 a TFC. 3 Q. Now, I think you had been involved in many firearms 4 operations before this one? 5 A. I had been involved in firearms operations, yes. 6 Q. You were aware of the range of the tactics employed by 7 tactical firearms units? 8 A. Yes, I wasn't trained in it, but I did know the tactics 9 that they could use, whether it be a house entry or 10 MASTS or ... 11 Q. I think, before 3 March 2012, the firearms unit had been 12 deployed on Operation Shire eight times. 13 A. Well, I think they had actually, physically been 14 deployed on two occasions. They had been held at 15 Openshaw -- in January -- 16 Q. Put it another way, authority to deploy? 17 A. Sorry, authority to deploy. They hadn't actually been 18 deployed other than on the 26th. 19 Q. Authority to deploy had actually been given eight times 20 before 3 March. 21 A. Yes. 22 Q. You said in answer there, "They had had the opportunity 23 to conduct their own research", was that a common 24 understanding between you and them; that you just gave 25 them a briefing, you gave them the subject profiles, and</p> <p style="text-align: center;">Page 50</p>	<p>1 Q. You are in the witness box at the moment -- 2 A. I am, yes. 3 Q. -- and I am asking you -- 4 A. You are asking me the reason why they would do it. 5 I suppose it is only them that could actually answer 6 that question. 7 Q. I am asking whether there was a common understanding 8 between you that you may hand over a subject profile, 9 for example, or profiles, who might give a briefing over 10 the phone, as happened here I think? 11 A. Yes. 12 Q. To Superintendent Granby, at 7.00, on the 2nd. 13 A. Yes. 14 Q. Then you would expect him to be thinking: this profile 15 is five months out of date. 16 A. No. 17 Q. Or: I had better go off and look at OPUS, and see what 18 that warning marker relates to. 19 Or: hold on, this was prepared for a different 20 operation, it has nothing to do with Operation Shire. 21 I had better conduct some research. 22 A. Do you want me to answer that? 23 Q. Yes. 24 A. Yes. No, is the first answer to that. 25 I think your understanding of the profiles -- the</p> <p style="text-align: center;">Page 52</p>

1 profiles that we will get, we will ask for them on
 2 people who come into the investigation. So we might ask
 3 for females, as we have done during the course of this
 4 investigation, that gives us a snapshot, at that
 5 particular time. What is really important in any
 6 investigation, and in this investigation, is the
 7 intelligence that is current at that particular time,
 8 and it is current in terms of -- from surveillance, from
 9 intelligence that is being received from whatever
 10 strands of intelligence are being received. Yes, it is
 11 good to have that initial snapshot, or as
 12 Rachel Griffiths refers to it, "Pen picture". It is
 13 nice to have that, but that is not the be all and end
 14 all in terms of an assessment. That is the initial kind
 15 of, "Right, let's have a look at this".
 16 For example, if I get a profile, if a profile said
 17 to me: Fred Bloggs is very surveillance conscious and he
 18 has cameras outside his house.
 19 Then it is important I know that information so
 20 I can brief the surveillance team. Not necessarily
 21 important for any arrest team, or it may be important
 22 for arrest team, but it is just to give you that
 23 snapshot, the initial phase. What also happens --
 24 Q. Sorry, just to break down some of the answers that you
 25 are helping us with --

Page 53

1 **A. Yes.**
 2 Q. -- you said, in answer to a question, I think three
 3 questions ago, that the briefing that the firearms team
 4 prepare --
 5 **A. Yes.**
 6 Q. -- is nothing to do with you.
 7 **A. No.**
 8 Q. Just remember that answer for later, probably this
 9 afternoon or tomorrow. But just testing it slightly --
 10 **A. In terms of the physical presentation of it.**
 11 Q. Yes. Is the content of it something that you would be
 12 interested in?
 13 **A. In what regard, sir?**
 14 Q. That it is accurate and not riddled with errors?
 15 **A. Well, if the information that I have given is**
 16 **accurate -- I don't go to a firearms briefing to check**
 17 **the accuracy of what is on that briefing. I go to**
 18 **a firearms briefing to update if there is any new**
 19 **intelligence on those subjects, if they have been**
 20 **arrested, if there is any intelligence that I am privy**
 21 **to.**
 22 **On this particular investigation, it was**
 23 **particularly important in relation to where vehicles**
 24 **were laid up and where they was parked. My role on that**
 25 **briefing is not to check the integrity of the actual**

Page 54

1 **briefing. I am sat in the firearms briefing with**
 2 **a surveillance radio with an ear piece in, I have my**
 3 **phone and I have contact with my staff, who can give me**
 4 **updates in relation to surveillance, where the vehicles**
 5 **are located, if the vehicles are moving and, indeed, on**
 6 **one occasion, the vehicles did move very early on.**
 7 **So, in answer to your question, it is not my**
 8 **function, it is not my responsibility to check the**
 9 **accuracy of that document. I understand that the TFC is**
 10 **the person that will check the document with whoever**
 11 **prepares it.**
 12 Q. Again we are going to come back to this in some detail
 13 later, but just to understand your answers there, there
 14 are two things that could be referred to as the
 15 briefing, there is one which is the PowerPoint
 16 presentation --
 17 **A. Yes.**
 18 Q. -- which is the briefing document?
 19 **A. Yes.**
 20 Q. And then there is the thing that happens at 5.00 or 6.00
 21 in the morning, which is when it or something
 22 approximating it is shown and read out?
 23 **A. Sorry, say that again? I think you are saying the same**
 24 **thing.**
 25 Q. No, there are two things that you could be referring to

Page 55

1 as "the briefing". One the PowerPoint presentation?
 2 **A. Yes.**
 3 Q. Yes? Which is a document.
 4 **A. Yes.**
 5 Q. And then is what is read out at 5.00 or 6.00 in the
 6 morning.
 7 **A. It is the PowerPoint that is read out in the morning.**
 8 Q. It is, is it? So it is word for word, verbatim read
 9 out?
 10 **A. I would not say it was word for word, verbatim. As**
 11 **I say, when you get to that stage of a firearms**
 12 **operation -- people from the firearms team would be able**
 13 **to answer this question better for you. But the purpose**
 14 **of me being there is if there is any new intelligence,**
 15 **and I think there is an occasion on one where I do give**
 16 **an intelligence update. But the briefing that is**
 17 **prepared, whenever it is prepared, if it is prepared all**
 18 **night or in the morning, it is the same thing that is**
 19 **delivered.**
 20 Q. Do you have the opportunity to see that, the PowerPoint
 21 presentation, before it is delivered?
 22 **A. No.**
 23 Q. Why not?
 24 **A. Because it is a tactical firearms briefing.**
 25 Q. It contains intelligence about your subjects, doesn't

Page 56

1 it?

2 **A. It contains intelligence that I have briefed up the**

3 **firearms cadre, and sometimes the TAC advisers are also**

4 **present on those briefings.**

5 Q. In this case, you had not seen the PowerPoint

6 presentation before it was delivered?

7 **A. No. Mr Beer, I wouldn't have time to go and sit and go**

8 **through however many slides there are -- 30, 40, 50**

9 **slides. I've got other demands on my time. I am not**

10 **based where that team is based for starting point.**

11 **There have been various times, during the course of**

12 **the investigation, when I have seen staff preparing the**

13 **document. I may have overlooked them, but it is not**

14 **something where I sit down and say, "Right, page one,**

15 **what have we got? Page 2, page 3", that is not my**

16 **responsibility.**

17 Q. Are you saying it is not the responsibility of the SIO

18 to check the accuracy of the intelligence that firearms

19 officers are provided with in their firearms briefing?

20 **A. What I am saying to you is the information that**

21 **I provide to the tactical firearms commander, and**

22 **sometimes the TAC adviser, is what should be reflected**

23 **on the briefing document.**

24 Q. You don't have a system or process by which the SIO

25 checks that before it is sent out?

Page 57

1 **A. No.**

2 Q. The second general topic then is: what responsibility

3 did you have in relation to obtaining and assessing

4 information upon which the decision to grant a firearms

5 deployment authority was made?

6 **A. Sorry, what kind of caused me to --**

7 Q. Yes.

8 **A. So if we get -- on this occasion, on the 25 January, we**

9 **have stolen vehicles travelling to the Stoke-on-Trent**

10 **area. I think it is Hanley area. At that point,**

11 **I didn't have my surveillance team on the back of them**

12 **and we required the services of another --**

13 Q. Sorry to --

14 **A. I am just trying to get round to the point of --**

15 Q. Shall we try and cut straight to it? What

16 responsibility do you have in the decision-making

17 process for the firearms deployment authority?

18 **A. If I think that the subjects are of a -- are so**

19 **dangerous that I am not satisfied that unarmed staff**

20 **could arrest these people, that is the first kind of**

21 **decision where I would need to approach a tactical**

22 **firearms commander.**

23 **Then, during the evidence gathering, if I gather**

24 **evidence or there is intelligence which suggests I may**

25 **need an arrest capability, that is the point I would go**

Page 58

1 **to the tactical firearms commander.**

2 Q. So, you are responsible for initiating the process, it

3 is you that starts the thing off, without you it doesn't

4 happen. Then, when you have made the decision to

5 initiate the process, you are responsible for providing

6 the tactical firearms commander with the information and

7 intelligence upon which he or she will make

8 an application to the strategic firearms commander for

9 authority?

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

11 Q. When you are making those applications or submissions to

12 the silver, the tactical firearms commander --

13 **A. Yes.**

14 Q. -- is there a template that you use in order to provide

15 information to him or her?

16 **A. There is now. There wasn't then.**

17 Q. I think I have understood from some of your written

18 evidence, that some silvers would say, "Look, I am

19 available come and have a chat. Let's do it face to

20 face".

21 **A. Yes.**

22 Q. Some of them, you would just do it over the phone.

23 **A. Yes.**

24 Q. And some of them you might supplement it by email?

25 **A. Yes, I think it's -- yes, time also is a consideration.**

Page 59

1 **Time in terms of their availability, but time also in**

2 **terms of: is this something that is happening in the**

3 **future or is this something that we need to do it here**

4 **and now?**

5 Q. You mentioned that the position has changed now, that

6 there is a template for the provision of intelligence

7 and information from an SIO to a silver.

8 **A. Yes.**

9 Q. Is that in order that some consistency and regulatory

10 can be brought to the process?

11 **A. I certainly would suspect so.**

12 Q. So that there can be no doubt about what the SIO said

13 and what the silver received?

14 **A. Well, given that they are asking for this one particular**

15 **document, so it is all presented in the same format,**

16 **yes.**

17 Q. It is not just presented in the same format, it is so

18 that the silver can be under no doubt as to what he or

19 she has been told, because it is on a piece of paper.

20 **A. It is on a piece of paper, but if there was surveillance**

21 **activity, you would still supplement it with that.**

22 **I think the point that you are raising is in terms**

23 **of where we are now, to where we were then, it is**

24 **possibly more streamlined now.**

25 Q. Never mind about streamlined, it is more reliable?

Page 60

1 **A. Well, I would like to think that the information that**
 2 **I have given, and have always given on every operation,**
 3 **has been reliable.**
 4 Q. Well, it depends, presumably, what the silver takes from
 5 what you are telling him or her, doesn't it?
 6 **A. Yes.**
 7 Q. What he selects or she selects as the important bits?
 8 **A. Which I would suggest, as we are all human beings, it**
 9 **would be subjective. I don't know. Again, you would**
 10 **have to ask a tactical firearms commander.**
 11 Q. Somebody else?
 12 **A. Yes.**
 13 Q. Sir, I wonder if that would be a convenient moment for
 14 us all to have a break?
 15 THE CHAIRMAN: Yes. Until 12.05.
 16 (11.56 am)
 17 (A short adjournment)
 18 (12.10 pm)
 19 MR BEER: Thank you, sir.
 20 Mr Cousen, were you aware of the critical importance
 21 of threat assessments conducted by tactical firearms
 22 commanders being as accurate and reliable as possible?
 23 **A. That is going to be part of their training, sir, so you**
 24 **would have to ask a tactical firearms -- I have not done**
 25 **the course, the firearms cadre course, so I am sure that**

Page 61

1 **is something addressed on that.**
 2 Q. Do you have to go on a course to know that a threat
 3 assessment conducted by a firearms officer needs to be
 4 as accurate and reliable as possible?
 5 **A. You would not have to go on a course to know that, but**
 6 **you would have to go on a course to know exactly what**
 7 **details need to be taken down; what is relevant and what**
 8 **is not relevant.**
 9 Q. But you would be aware, yourself, of the importance of
 10 such threat assessments conducted by them as being as
 11 accurate and reliable as possible?
 12 **A. I would be aware that I am going to give them**
 13 **100 per cent accurate information.**
 14 Q. I am talking about the critical importance of the threat
 15 assessment being conducted by them as being as accurate
 16 and reliable as possible. You would know that that is
 17 important, wouldn't you?
 18 **A. I don't know if you are trying to get me to answer**
 19 **a question on behalf of somebody else here.**
 20 Q. I am not, no.
 21 **A. It is clear that it is important that the information**
 22 **that I give to the firearms cadre enables them to --**
 23 THE CHAIRMAN: Mr Cousen, that is not actually the question
 24 you are being asked.
 25 **A. Sorry.**

Page 62

1 THE CHAIRMAN: It is all right. If you would like to just
 2 listen carefully, take your time and listen to the
 3 question again, please.
 4 **A. Yes.**
 5 MR BEER: Were you aware of the importance that the threat
 6 assessment conducted by a tactical firearms commander
 7 should be as accurate and reliable as possible?
 8 **A. I am aware that it is potentially deploying firearms**
 9 **officers, so I am aware that, clearly, it has to be**
 10 **accurate.**
 11 Q. Were you aware of the importance of the need to ensure
 12 that intelligence provided to the AFOs, the authorised
 13 firearms officers, as to the threat posed by subjects
 14 was as accurate and reliable as possible?
 15 **A. Again, it is the information that is being presented to**
 16 **the AFOs is coming from the tactical firearms commander.**
 17 **So I suppose it is -- if the information has to be**
 18 **accurate to the TFC, it lends itself that it has got to**
 19 **be accurate because it is the same information.**
 20 Q. You would have appreciated, I think with your
 21 experience, that the response of AFOs, in particular
 22 their decision whether to shoot or not, may depend on
 23 the accuracy of information they receive about
 24 a subject's threat?
 25 **A. Again, you are kind of asking me to answer a question --**

Page 63

1 **I have never been a firearms officer, so it is a little**
 2 **bit unfair for me to answer in relation to -- clearly,**
 3 **they are expected -- the briefing that they have been**
 4 **given is accurate and that stems from the information**
 5 **that has been presented to the TFC.**
 6 Q. You would know that the action that they take may, to
 7 a significant degree, depend on the information that
 8 they have received about the threat that a subject
 9 poses?
 10 **A. Yes.**
 11 Q. If the threat has been underestimated, that may put the
 12 lives of members of the public or the officers at risk?
 13 **A. That could happen, yes.**
 14 Q. If it is exaggerated or misleading, the subject may be
 15 put at risk, when in fact they posed no imminent threat;
 16 yes?
 17 **A. Sorry, yes -- are you saying if this is an overstated**
 18 **intelligence case, as was suggested by the IPCC?**
 19 Q. Yes. So it can work both ways round, can't it? If the
 20 information is inaccurate or unreliable, that has been
 21 given to an AFO, they may take action on it, or fail to
 22 take action on it, that puts the lives of people at
 23 risk.
 24 **A. Potentially. I don't know if I am qualified to actually**
 25 **answer that, but potentially. As I have said, I am not**

Page 64

1 **an authorised firearms officer. Never have been. Not**
 2 **a trained cadre.**
 3 Q. To take an example, a person may be shot because of
 4 a movement they make with their hand; yes?
 5 I am thinking hypothetically here.
 6 **A. I don't know, do I? I am not a trained firearms**
 7 **officer. Firearms officers train day in, day out, and**
 8 **I am not trained to give an answer to that question.**
 9 Q. Did you realise that providing information to the TFC,
 10 which would in turn be provided to the AFOs, was of
 11 critical importance to decisions that firearms officers
 12 would take?
 13 **A. It is absolutely important, the information that I have**
 14 **presented to the tactical firearms commander because, in**
 15 **essence, that is what they use then to go and brief the**
 16 **strategic firearms commander. So, clearly, it was**
 17 **important.**
 18 Q. That is going up to the SFC, I am talking about going
 19 down, as well, to the AFOs.
 20 **A. Yes.**
 21 Q. It is both, isn't it?
 22 **A. You would expect it should be the same information. But**
 23 **I am saying that, I am saying "You would expect it**
 24 **should be the same information", I am not actually**
 25 **qualified to say if it should be the same information or**

Page 65

1 **not, because I suppose it could depend on tactics that**
 2 **are being used. I don't know.**
 3 Q. Did you realise that the information that you provided
 4 the tactical firearms commander may be provided to AFOs
 5 and, upon the basis of that information, they may take
 6 decisions that were a matter of life and death?
 7 **A. Yes.**
 8 Q. Were you given any guidance on what information to
 9 provide a TFC in order to (a) allow them to make
 10 an application for deployment authorisation, and (b)
 11 properly to brief up AFOs?
 12 **A. Well, in terms of courses, there is not a course you can**
 13 **do to do that, because obviously it is from professional**
 14 **experience. But the way that you brief a firearms cadre**
 15 **is that you would brief them on when the operation has**
 16 **started, what the intelligence was at that time, what**
 17 **your surveillance has told you at that time. And then,**
 18 **they would ask you further questions in relation to**
 19 **whatever they deemed was necessary.**
 20 They have a booklet that -- all the firearms
 21 commanders have a booklet they work to where the
 22 questions they ask you are based on the answers they
 23 need to put in their booklets.
 24 Q. I am thinking more in terms of what ends up with the
 25 AFOs on the ground. You realise the information you

Page 66

1 were providing may end up with them and, on the basis of
 2 that information, they may take significant decisions?
 3 **A. Yes, they wouldn't be aware of all the information, so**
 4 **they would be aware of some of the information, but not**
 5 **all of it.**
 6 Q. The information that you provided, you were aware that
 7 that may filter down to the AFOs?
 8 **A. Yes, some of it would.**
 9 Q. That they may take decisions that may be, as we have
 10 said, a matter of life and death on the basis of it?
 11 **A. Some of that information, yes.**
 12 Q. Were you given any training or guidance which made clear
 13 the importance of providing individual threat
 14 assessments in relation to operations where there were
 15 multiple subjects?
 16 **A. I have never had any training in that regard. Within**
 17 **the serious and organised crime world, up until probably**
 18 **nine months ago, 12 months ago, there was never any kind**
 19 **of formal qualification. It was very much based on**
 20 **a professional experience, speaking to peers, speaking**
 21 **to firearms cadres, so there wasn't any formal**
 22 **qualification. But I had been based, as I said, within**
 23 **the Excalibur Unit, where we dealt with purely guns and**
 24 **gangs, so I had a lot of experience of dealing with**
 25 **firearms cadres.**

Page 67

1 Q. Had you received any training or guidance -- I think the
 2 answer is going to be, "No", in the light of the answers
 3 that you have given already -- that made it clear that
 4 the information you provided to a TFC should be reduced
 5 to writing?
 6 **A. No, I don't have any training in that regard.**
 7 Q. Not just so that lawyers could look over it afterwards,
 8 but so that those receiving it could see, at the time,
 9 what had been written, rather than word of mouth being
 10 used?
 11 **A. I had not had any training in that regard.**
 12 Q. Are you satisfied that you obtained sufficient
 13 information about Mr Grainger to enable an individual
 14 threat assessment to be formulated in relation to him?
 15 **A. Yes, I felt like I had received enough information.**
 16 **Yes.**
 17 Q. And that that threat assessment was as accurate as
 18 possible, based on the information that was available?
 19 **A. Well, I know now, don't I, that there was a piece of**
 20 **information that was incorrect but, at the time,**
 21 **obviously, I believed it to be correct. What I would**
 22 **also point out at this point is that, at the outset of**
 23 **this operation, indeed all the way through the first**
 24 **deployments in the Stoke-on-Trent area, Anthony wasn't**
 25 **a key subject in relation to this.**

Page 68

1 **David Totton was the primary subject. David Totton**
 2 **is where all the risk lay, at that time. David Totton**
 3 **was the only person who had been identified, which was**
 4 **on 25 January. I just think it is really important,**
 5 **that's an understanding from Anthony's family, that at**
 6 **that point of that deployment, that actually the**
 7 **firearms authority was granted, not on the basis of**
 8 **Anthony but on the basis of, primarily, David Totton.**
 9 **I know that, obviously, the tactical firearms**
 10 **commander is going to be called to give evidence in that**
 11 **regard, but I think it is important that I say that.**
 12 Q. What do you mean by: you understand that the TFC,
 13 Mr Granby, is going to be called in that regard?
 14 **A. Sorry, not Mr Granby, Mr Ellison.**
 15 Q. Right, ie the original one, back in January?
 16 **A. Yes.**
 17 Q. You are saying, I think, that you assess risk by
 18 reference to the person that posed the highest risk, not
 19 the lowest risk.
 20 **A. What I am saying is --**
 21 Q. Is that right?
 22 **A. -- if you had a group, if two of those people had very**
 23 **low risk, but one of them had very high -- and, again,**
 24 **I am not a firearms commander but, certainly, on**
 25 **investigations that I have conducted myself, if you have**

Page 69

1 **got somebody who is of significant risk, then that is**
 2 **the risk that you of to deal with.**
 3 Q. But what about if you have a group made up of a number
 4 of subjects, and some of them, as you have said here,
 5 like Mr Totton, in your words, posed a high risk or the
 6 greatest risk --
 7 **A. Yes.**
 8 Q. -- but others did not; would you make that clear?
 9 **A. In terms of what we thought the roles would be?**
 10 Q. What you brief up the TFC?
 11 **A. Anthony had not featured, at that point, on the 25th.**
 12 Q. I am talking more about March.
 13 **A. Sorry.**
 14 Q. Would you make it clear if, say, I think in one of your
 15 statements you say it would not matter if Anthony had
 16 never been in contact with the police at all?
 17 **A. Yes.**
 18 Q. Would you make that clear to the TFC?
 19 **A. Perhaps not in them words. I wouldn't say that, but the**
 20 **briefing I would give would be more in tune with what**
 21 **the highest risk was, because those are the questions**
 22 **that I would be getting asked. The majority of the**
 23 **questions that I would get asked would be on whatever**
 24 **the highest threat is.**
 25 Q. Can I turn to what sources of information you had access

Page 70

1 to and what was made available to Mr Lawler and then
 2 Mr Granby?
 3 **A. Yes.**
 4 Q. I think, amongst others, you were aware of the following
 5 sources of information about Mr Grainger: his police
 6 national computer record?
 7 **A. Yes, I don't remember when I have seen it, but I would**
 8 **have certainly had -- the investigation team would have**
 9 **had access to it.**
 10 Q. OPUS, and in particular Mr Grainger's records on OPUS?
 11 **A. Yes.**
 12 Q. COPU --
 13 **A. Yes.**
 14 Q. -- logs?
 15 **A. Yes.**
 16 Q. That were sent to you or the team?
 17 **A. Yes.**
 18 Q. Crime reports mentioning Mr Grainger. I think they
 19 would be taken from OPUS, would they?
 20 **A. Not necessarily. What would happen with crime reports**
 21 **is, when you are briefing up the tactical firearms**
 22 **commander, if they asked specifically, "Can you tell me**
 23 **about such a crime, such an incident", you would then**
 24 **deal with it at that point. But it is not -- you**
 25 **wouldn't take crime reports into a briefing with you.**

Page 71

1 **It is only if you asked specifically about that.**
 2 Q. Yes, I was not saying what you took into a briefing with
 3 you, I was saying what sources of information you had
 4 access to by the time you came to brief up Mr Lawler,
 5 and then Mr Granby.
 6 **A. Yes, so the OPUS system. Yes, they would have access**
 7 **to ...**
 8 Q. I am not talking about them, I am talking about you.
 9 What sources of information you had access to.
 10 **A. Sorry, I said I would have had access to OPUS.**
 11 Q. Right.
 12 Information and intelligence from surveillance?
 13 **A. Yes.**
 14 Q. Conducted either by members of your team or by the DSU?
 15 **A. Yes.**
 16 Q. The kind of information that was provided by DC Mills,
 17 ie personal recollection of a previous incident?
 18 **A. I don't think it was a personal recollection. I think**
 19 **it actually looked somewhere from -- if you have got the**
 20 **email, I can -- in fact, I may have the email here.**
 21 **I can refer to it.**
 22 Q. We have the email. We have probably have it 25 times
 23 and we have heard evidence about it, but a recollection
 24 of a link between a previous incident and then he went
 25 away and pulled a paragraph from DC Mulverhill's report

Page 72

<p>1 and emailed it to you?</p> <p>2 A. Right, okay.</p> <p>3 Q. Yes?</p> <p>4 A. Yes.</p> <p>5 Q. I am just looking at the variety of sources that you</p> <p>6 had.</p> <p>7 A. Yes.</p> <p>8 Q. Sensitive sources, including speaking to the Force</p> <p>9 Intelligence Branch, and having information that was</p> <p>10 entered on to the intelligence chronology?</p> <p>11 A. Yes.</p> <p>12 Q. Are you happy that, having regard to all of those</p> <p>13 sources, you gave all relevant information and</p> <p>14 intelligence to Mr Lawler?</p> <p>15 A. Yes, I would have given enough information for Mr Lawler</p> <p>16 to be satisfied that he could make the risk assessment.</p> <p>17 Q. Are you content that you provided all relevant</p> <p>18 information and intelligence from those sources</p> <p>19 available to Mr Granby?</p> <p>20 A. Whatever Mr Granby would have asked for, I would have</p> <p>21 provided him with the information.</p> <p>22 Q. That's a different question.</p> <p>23 A. Okay.</p> <p>24 Q. Or an answer to a different question.</p> <p>25 A. Well, the same answer to Mr Lawler. I think I mentioned</p> <p style="text-align: center;">Page 73</p>	<p>1 items at that point, which related to either Mr Totton,</p> <p>2 Mr Rimmer, or to Anthony, so I provided him with details</p> <p>3 in relation to that.</p> <p>4 Q. We are going to come back to that in a moment. Had he</p> <p>5 got the intelligence chronology in front of him?</p> <p>6 A. No. Well, I am saying no, I don't think he had. I had</p> <p>7 had to read it out so I suspect he'd not.</p> <p>8 Q. You had to read it out, so you suspect that he hadn't.</p> <p>9 So you had the intelligence chronology in front of</p> <p>10 you, and I think by then it would have had 43 entries on</p> <p>11 it and you would have been reading out six or seven, did</p> <p>12 you say, or five or six?</p> <p>13 A. I can tell you ... one, two, three, four, five, six.</p> <p>14 Six.</p> <p>15 Q. We are going to come back to this in some great detail</p> <p>16 tomorrow, I suspect.</p> <p>17 A. Sure.</p> <p>18 Q. So you read out to him five or six?</p> <p>19 A. Yes.</p> <p>20 Q. And what was --</p> <p>21 A. Yes, any that related to those subjects, because by this</p> <p>22 time the operations had been split, so that any relating</p> <p>23 to those subjects he was briefed on; briefed very, very</p> <p>24 briefly in relation to the overnight deployment, that</p> <p>25 had subsided, had been stood down and the firearms</p> <p style="text-align: center;">Page 75</p>
<p>1 it right at the start, the tactical firearms commanders</p> <p>2 approach differently the way that they risk assess, or</p> <p>3 they certainly ask different questions. Mr Granby was</p> <p>4 given enough information in relation to him to do a risk</p> <p>5 assessment.</p> <p>6 Q. Just whilst we are on that, Mr Granby was given enough</p> <p>7 information. I think you spoke to him at about 7.00 or</p> <p>8 7.05 on the Friday; how long did you speak with him for?</p> <p>9 A. If I could just have a look at my book.</p> <p>10 Q. Yes, I don't think there an end time in your book.</p> <p>11 A. Right. Well --</p> <p>12 Q. It just says 7.05.</p> <p>13 A. Yes, I don't know how long I spoke to him for.</p> <p>14 Q. Have you a recollection?</p> <p>15 A. Yes, when I have contacted him, I have said to him I was</p> <p>16 ringing up in relation to Operation Shire. He already</p> <p>17 had some knowledge of Operation Shire. I think he had</p> <p>18 either spoken to or met up with Mr Lawler. I told him</p> <p>19 that I had had an intelligence update that I needed to</p> <p>20 speak to him about; yes?</p> <p>21 Which is, what, the first item that I spoke to him</p> <p>22 about. Once I had spoken to him about that, I then gave</p> <p>23 him an overview of Operation Shire, how we had started</p> <p>24 it in October, how -- I then referred to the chronology</p> <p>25 document in relation to -- there was either five or six</p> <p style="text-align: center;">Page 74</p>	<p>1 authority had been rescinded, and, yes, that is the</p> <p>2 information.</p> <p>3 Q. I think my question was how long do you think you spoke</p> <p>4 to him for?</p> <p>5 A. Let me have a look at the what time the next phone call</p> <p>6 was made, because that might be an indication. (Pause)</p> <p>7 19.14, yes, so I would suspect probably half an hour</p> <p>8 or so.</p> <p>9 Q. You think it was about half an hour?</p> <p>10 A. Yes, possibly. Yes.</p> <p>11 Q. So between 7.05 and about 7.30, 7.35?</p> <p>12 A. Yes.</p> <p>13 Q. I think it is your belief that Mr Grainger's risk was</p> <p>14 "a lot lower" than that of Mr Totton?</p> <p>15 A. I thought Anthony was going to be the driver in relation</p> <p>16 to --</p> <p>17 Q. That is an answer to a different question.</p> <p>18 A. Is it?</p> <p>19 Q. Yes, which is what role do you think he would adopt.</p> <p>20 A. Sorry.</p> <p>21 Q. The question I asked was, it is right that you thought</p> <p>22 that his risk was a lot lower than that of Mr Totton?</p> <p>23 A. I did, yes.</p> <p>24 Q. What role did you think he would take?</p> <p>25 A. That he was the driver.</p> <p style="text-align: center;">Page 76</p>

1 Q. Why did you think that?
 2 **A. Because of the way the vehicles were being moved around.**
 3 **There was originally two stolen vehicles in play. One**
 4 **of those, the BMW, had been lifted but then, where the**
 5 **Audi was being parked, which was up in Bolton, generally**
 6 **around the Deane Church Lane area, that kind of caused**
 7 **me to think that Anthony was -- the other thing is**
 8 **Anthony never featured on surveillance when we would say**
 9 **that the subjects were doing kind of day-to-day**
 10 **business. It was only when the stolen vehicles, the**
 11 **Audi, was being moved, moved around.**
 12 Q. I think you formed the view that Mr Grainger posed a lot
 13 lower risk than Mr Rimmer, Aaron Corkovic or
 14 Jamie Corkovic?
 15 **A. Yes. To be fair, Aaron and Jamie Corkovic weren't**
 16 **relevant at that point.**
 17 Q. I know they were not relevant, but in terms of your
 18 overall assessment of the risk, Mr Grainger was at the
 19 bottom of the list?
 20 **A. To be fair, Mr Beer, I didn't kind of rate them. What**
 21 **I think I originally said is he certainly didn't pose**
 22 **the risk that David Totton ...**
 23 Q. I am just reading an answer you gave when you were
 24 interviewed. You said, when you were interviewed:
 25 "Looking back at the risk for the individuals,

Page 77

1 Anthony Grainger -- if you look at a David Totton,
 2 Rimmer -- Anthony Grainger -- Corkovic, Aaron Corkovic,
 3 Jamie Corkovic -- Anthony Grainger in terms of risk
 4 comes a lot lower down."
 5 **A. Yes.**
 6 Q. Which tended to suggest that he came underneath all four
 7 of those?
 8 **A. Yes. The point being that I didn't physically rate**
 9 **them.**
 10 Q. Was there a reason for that, that you didn't
 11 individualise the threat that each of them posed?
 12 **A. No, you would look at the individual but you would look**
 13 **at collective as well, but I was also aware that, when**
 14 **I went to brief up the firearms cadre, the first person**
 15 **who they would want me to brief up on is the person that**
 16 **carried the highest risk.**
 17 Q. Would you individualise the risk when you were briefing
 18 up the firearms cadre, ie say, "Look, this is the most
 19 dangerous or the most risk worthy or the person that
 20 poses the most threat; this man is the driver, he hasn't
 21 got any convictions for violence", whatever?
 22 **A. No, it is probably more like you have just said yourself**
 23 **there, it may have been that, when Anthony's name is**
 24 **mentioned, "Suspect Anthony is going to be the driver,**
 25 **he has got access to the vehicle", yes, as you have just**

Page 78

1 **kind of alluded to.**
 2 Q. Would you call him "Suspect Anthony"?
 3 **A. They had subject names.**
 4 Q. When you were briefing them up though -- I am calling
 5 him Mr Grainger throughout, and you are referring to him
 6 as Anthony -- would you call him "Subject Anthony" when
 7 you are briefing up the --
 8 **A. No, all the people on the operation have subject names.**
 9 Q. When you are briefing up the firearms team, do you use
 10 those subject names?
 11 **A. No, I would have said "Anthony Grainger".**
 12 Q. Yes. I thought so.
 13 **A. Sorry, that is out of respect for his family.**
 14 Q. Can we look then please at Mr Grainger's previous
 15 offending history, please.
 16 **A. Yes.**
 17 Q. I want to try and establish a picture of the threat
 18 posed by Mr Grainger.
 19 **A. Okay.**
 20 Q. Can we start, as a first subheading, with his previous
 21 convictions. Can we look at file C, page 766, please.
 22 **A. Sorry, sir, what page is it?**
 23 Q. In fact, if we start, please, at 757.
 24 **A. Yes.**
 25 Q. You will see this a police print of Mr Grainger's PNC

Page 79

1 record.
 2 **A. Yes.**
 3 Q. So I am using this to try and establish his previous
 4 conviction record, yes?
 5 **A. Okay, yes.**
 6 Q. Looking at it in general terms, and I think 766 is where
 7 the conviction history starts --
 8 **A. Yes.**
 9 Q. -- it is right that Mr Grainger had a number of
 10 convictions for non-violent offences?
 11 **A. Yes. Going from the titles on here -- do you want me to**
 12 **go through them or ...**
 13 Q. Well, I have gone through them and there is a summary
 14 there, the offence summary.
 15 **A. Yes.**
 16 Q. But when you look into the details of the convictions
 17 over the next 28 or 30 pages, I think we can see that
 18 they are convictions for non-violent offences. The
 19 overwhelming majority are for offences of dishonesty,
 20 mainly theft and driving offences.
 21 **A. Okay.**
 22 Q. Can you maybe help us and confirm that Mr Grainger had
 23 no previous convictions involving the possession or use
 24 of firearms?
 25 **A. Yes, there is nothing on here that suggests that.**

Page 80

<p>1 Q. No convictions for offences involving the possession or 2 use of weapons? 3 A. Not that I am aware -- I think there was just one. I am 4 just looking for it now, I think there was one incident 5 which was an affray, I think it was, originally. 6 Q. We are going to come to that in detail. I am looking 7 for convictions for the use or possession of weapons. 8 A. Right, sorry. No, no possession of offensive weapons 9 or -- 10 Q. No firearms, no offensive weapons? 11 A. No. 12 Q. No previous convictions for offences involving the use 13 of violence? 14 A. No. I think, in answer to your question, that is 15 correct, yes. 16 Q. No previous convictions for robbery? 17 A. No. 18 Q. Can we turn to the thing that you wanted to maybe talk 19 about, which was the driving incident on 20 4 December 1997, when it was side I think that 21 Mr Grainger rammed police vehicles, yes? 22 A. Yes. 23 Q. I think we can see that on page 771. 24 A. Yes. 25 Q. And just to establish, firstly, he wasn't convicted of</p> <p style="text-align: center;">Page 81</p>	<p>1 whether there was any history of using a vehicle as 2 a weapon? 3 A. I don't remember him doing, but he did ask -- the 4 vehicle that was kind of in play at the time, the Audi 5 A6, he did have a concern about that because of the 6 power of the vehicle. 7 Q. But you didn't know about the circumstances of the 8 4 December 1997 incident until after the event, in any 9 event? 10 A. Yes, that's correct. 11 Q. Can we look, then, having looked at the conviction 12 history then, to allegations which were not 13 substantiated by conviction concerning violence. Can we 14 look in this folder, please, at page 727. 15 A. Sorry, mine starts at 733. 16 THE CHAIRMAN: Yes, it will be in the previous file. 17 MR BEER: Have you got that, in 727? 18 A. Yes. 19 Q. Just to orientate yourself, and you probably recognise 20 it already, this is part of a screen or a field within 21 OPUS. 22 A. Yes. 23 Q. Particularly the OPUS record for Mr Grainger -- 24 A. Okay. 25 Q. -- which started at page 704.</p> <p style="text-align: center;">Page 83</p>
<p>1 any offences involving the use of violence relating to 2 this incident? 3 A. No, he wasn't. 4 Q. If we look, please, at page 757 in the same bundle -- 5 I am so sorry, that is a rogue reference. I think the 6 affray was ordered to lie on the file, is that right? 7 A. I would have to have a look, sir. If you can point me 8 in the right direction? 9 Q. Yes, I think 771. 10 A. You have got the driving whilst disqualified. It 11 mentions that the vehicle has been reversed into 12 a police vehicle. 13 Q. Causing damage to the vehicles? 14 A. Causing damage to both vehicles. I am not sure if any 15 of the police officers were injured as a result of that. 16 The reason why I paused when you just asked one of 17 your questions is, when you mentioned about weapons, one 18 of the things that certainly Mr Lawler used to always 19 say, and I am talking about on other investigations, is 20 that vehicles can be used as weapons. That was 21 something that was mentioned previously. I am not 22 saying that happened here but -- 23 Q. Did he ask you that on this occasion? 24 A. I was not aware of that incident in that regard. 25 Q. Okay. Just take it in stages. Did Mr Lawler ask you</p> <p style="text-align: center;">Page 82</p>	<p>1 A. Okay. 2 Q. Can you explain what this screen is, please? It goes on 3 to 728 and 729 and 730, it goes on for a number of 4 pages. 5 A. It gives a summary of crimes that people have been 6 arrested for. It will give a date that the crime has 7 been committed. 8 Q. Just stopping you there, it follows, does it, that in 9 order to get a field populated on here, on your OPUS 10 record, you must have been arrested for it? 11 A. No. You could go on there if you was locate/trace, if 12 you was wanted for that offence. As long as you were 13 named on the crime, you could be. 14 Q. That is what we are trying to understand, exactly what 15 this field or screen means. 16 A. Yes, your name has to have been connected to a crime in 17 one way or another. 18 Q. Associated. Okay, so your name has to be associated or 19 connected to a crime in one way or another to get on to 20 here? 21 A. Yes. 22 Q. Okay. 23 Similarly, at 737 -- 24 A. Yes. 25 Q. -- can you help us to explain what that screen is? It</p> <p style="text-align: center;">Page 84</p>

1 is part of the same OPUS record.
 2 **A. Yes, again, offences. It is dragged from the GMPics**
 3 **system. So the GMPics was the old system where you**
 4 **could have a page which was offences. I am not sure if**
 5 **some of those offences may be from other force areas,**
 6 **but that's -- I am just trying to ...**
 7 Q. Why are there dozens of crimes but only about 20
 8 offences?
 9 **A. Yes, I am not actually sure if that is what they**
 10 **initially get arrested for, because when you go into**
 11 **custody, if you are arrested for 15 theft of motor**
 12 **vehicles, you would be arrested for one offence, or one**
 13 **offence would be recorded. If you were subsequently**
 14 **interviewed, then it would be 15 crimes that related to**
 15 **it, so the crimes will have the totality of whatever it**
 16 **is that you are going to be arrested and interviewed**
 17 **about. Whereas this page, you would probably have to**
 18 **get somebody from the actual OPUS team, but I think this**
 19 **is actually dragged from the arrests.**
 20 Q. What on page 727 do the fields in the column "Status:
 21 eliminated" mean?
 22 **A. "Eliminated" means you have been eliminated from that**
 23 **investigation.**
 24 Q. What does that mean?
 25 **A. Eliminated, you are no longer -- you are not a suspect.**

Page 85

1 **You are not a suspect in that investigation.**
 2 Q. Is it a positive finding, effectively, that there is no
 3 suspicion that you are the offender for that offence?
 4 **A. Or it could be there is no evidence to implicate you in**
 5 **that offence as deemed by -- I am just trying to think**
 6 **of an example. We have a lot more codes for this now,**
 7 **but if the CPS for example had said there is not enough**
 8 **evidence to charge somebody, but you had been arrested,**
 9 **a file of evidence had gone to the CPS and they say**
 10 **there is not enough evidence to charge, then you would**
 11 **be shown as eliminated from the investigation.**
 12 Q. What does "Accused" mean?
 13 **A. You have been charged or summonsed.**
 14 Q. "Accused" means charged or summonsed?
 15 **A. Yes.**
 16 Q. What does the dash mean?
 17 **A. If the crime status shows "Undetected", it means**
 18 **probably that the OIC has not updated the offender menu**
 19 **page.**
 20 Q. Right.
 21 I think we can look also on page 737 to see
 22 a similar status column. Can you see that?
 23 **A. Yes.**
 24 Q. I think from the collar numbers we can see that there is
 25 an element of duplication between the crimes page on 727

Page 86

1 and the offences page on 737?
 2 **A. Yes.**
 3 Q. So that fits with your suggestion that these are dragged
 4 across?
 5 **A. Yes.**
 6 Q. Is that right?
 7 **A. Well, yes, like I said, you might be better getting**
 8 **somebody from the OPUS team to explain it for absolute**
 9 **clarity, but that is kind of my understanding for it.**
 10 Q. We can see from 727 that Mr Grainger was arrested for
 11 two section 20 assaults in 1997.
 12 **A. Yes.**
 13 Q. Can you see that?
 14 **A. Yes.**
 15 Q. I think they are seven and six lines from the bottom.
 16 "Assault section 20", "Assault section 20", and that is
 17 4 December 1997.
 18 **A. Yes.**
 19 Q. Is it your understanding now that these related to the
 20 driving incident on 4 December 1997?
 21 **A. Well, I would have to have a look to see what they**
 22 **relate to. The two that relate to section 20 assaults?**
 23 Q. Yes.
 24 **A. I wouldn't know without actually looking at them what**
 25 **they related to.**

Page 87

1 Q. When you say you wouldn't know without looking at them,
 2 what do you mean, looking at the crime report that
 3 applies to it?
 4 **A. Yes. I would go on to the OPUS system and put it on.**
 5 Q. Let's just work on the assumption at the moment that
 6 those two section 20s on 4 November 1997 relate to the
 7 driving incident that we have spoken about.
 8 Can we see on page 771 that Mr Grainger was charged
 9 in relation to an offence of driving whilst disqualified
 10 on 4 December 1997?
 11 **A. Yes.**
 12 Q. And he pleaded guilty and was sentenced to three months'
 13 imprisonment?
 14 **A. Yes.**
 15 Q. Do you see at the foot of the page, "Manchester City
 16 Crown imprisonment: 15 months consecutive", on page 771?
 17 **A. Yes.**
 18 Q. What is that for?
 19 **A. I would have to get the court document out to have**
 20 **a look at it, the court reference.**
 21 Q. There appear to be two offences there, one a taking
 22 without consent, a TWOC?
 23 **A. And a driving --**
 24 Q. And a driving whilst disqualified, and for one it seems
 25 three months and the other 15 months consecutive. Would

Page 88

<p>1 that be right?</p> <p>2 THE CHAIRMAN: There is a reference to another offence on</p> <p>3 that page, from the bottom --</p> <p>4 MR BEER: Yes, about 10 lines up, dangerous driving. Do you</p> <p>5 think it relates to that, looking at this PNC record?</p> <p>6 A. Well, the dates are right and the court reference is</p> <p>7 right, but I don't know.</p> <p>8 Q. You don't know?</p> <p>9 A. No.</p> <p>10 Q. But in any event, looking at the PNC record, in relation</p> <p>11 to the driving incident, there is no conviction for</p> <p>12 an offence of violence?</p> <p>13 A. No, there's not, no.</p> <p>14 Q. Thank you.</p> <p>15 Can I turn then to another allegation of the use of</p> <p>16 violence. Can we look at 727, please, and can you see</p> <p>17 an allegation -- it is about the middle of the page</p> <p>18 "Assault, section 47" --</p> <p>19 A. Yes.</p> <p>20 Q. -- alleged to be committed on 30 October 1999.</p> <p>21 A. Yes.</p> <p>22 Q. If we look at 737 -- I am not sure that we can see it on</p> <p>23 there. 30 October 1999.</p> <p>24 A. No.</p> <p>25 Q. Does that tend to suggest that Mr Grainger was not</p> <p style="text-align: center;">Page 89</p>	<p>1 Q. It is not on the profile.</p> <p>2 A. It is not on the profile? Right, in that case then,</p> <p>3 I wouldn't have provided that information.</p> <p>4 Q. Okay.</p> <p>5 Can we look, then, at 737.</p> <p>6 A. Yes.</p> <p>7 Q. It may be at the other end of the scale.</p> <p>8 A. Yes.</p> <p>9 Q. Can you see six lines down, under "Offences", it says</p> <p>10 "Murder, 23 May 2000: Suspected".</p> <p>11 A. Yes.</p> <p>12 Q. Do you know whether that is in fact a mistake and it was</p> <p>13 Mr Grainger's brother Stuart that was suspected of</p> <p>14 a murder in 2000?</p> <p>15 A. I don't know.</p> <p>16 Q. I have looked at your documents and none of your</p> <p>17 documents suggest that Mr Grainger was ever suspected of</p> <p>18 a murder.</p> <p>19 A. No.</p> <p>20 Q. You didn't brief anyone up --</p> <p>21 A. Absolutely not.</p> <p>22 Q. -- that he was suspected?</p> <p>23 A. No.</p> <p>24 Q. If you did suspect that he was, I think you probably</p> <p>25 would have told people about it?</p> <p style="text-align: center;">Page 91</p>
<p>1 arrested for that offence?</p> <p>2 A. Yes, it may be -- it could be for a variety of reasons.</p> <p>3 It could be -- let me just have a look at what the crime</p> <p>4 status said. "Accused", it is showing as "Detected",</p> <p>5 which would normally indicate that somebody has been</p> <p>6 arrested and charged, but it could also be if there is</p> <p>7 sufficient evidence to show that somebody is a suspect</p> <p>8 but then the aggrieved party, the victim refuses to</p> <p>9 prosecute, so --</p> <p>10 Q. I see, so evidential sufficiency was met but in fact the</p> <p>11 complainant decided --</p> <p>12 A. Yes. I would have to look individually but it could be</p> <p>13 a reason for it.</p> <p>14 Q. Did you pass the anyone in the TFU any information about</p> <p>15 this incident?</p> <p>16 A. No.</p> <p>17 Q. Is that because you didn't know about it or because it</p> <p>18 was, in the scheme of things, such a minor incident that</p> <p>19 it wouldn't be of any relevance to them?</p> <p>20 A. No, obviously, when I have been briefing up in relation</p> <p>21 to Anthony, if I would have been asked a question in</p> <p>22 relation to what any crimes relate to, then I would have</p> <p>23 obviously answered the question.</p> <p>24 I don't think, in relation to -- if I could look at</p> <p>25 a profile, I can probably --</p> <p style="text-align: center;">Page 90</p>	<p>1 A. Yes.</p> <p>2 Q. Okay.</p> <p>3 It may be, sir, that this relates to the Bolton</p> <p>4 robbery where Stuart Grainger was charged but found not</p> <p>5 guilty of shooting at a police officer or of the murder</p> <p>6 for which Mr Stuart Grainger was convicted.</p> <p>7 THE CHAIRMAN: Yes.</p> <p>8 MR BEER: Can we look, please, at page 737.</p> <p>9 A. Yes.</p> <p>10 Q. The offence of wounding, first in the list,</p> <p>11 7 January 2002.</p> <p>12 A. Yes.</p> <p>13 Q. "Arrested", and the collar number is 04773. That</p> <p>14 appears, if you go back to 727 --</p> <p>15 A. Yes.</p> <p>16 Q. -- to be the crime with the reference in the left-hand</p> <p>17 column 157497H01.</p> <p>18 A. Yes.</p> <p>19 Q. If you compare the collar numbers, yes?</p> <p>20 A. Yes.</p> <p>21 Q. Would you agree?</p> <p>22 A. Yes -- no, it is different dates.</p> <p>23 Q. Are they? 7 January 2002 -- yes, you are quite right.</p> <p>24 It has not even made it on to the crimes, has it?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 92</p>

<p>1 Q. Do you know why that might be?</p> <p>2 A. No.</p> <p>3 Q. Right. Do you know anything about that alleged offence?</p> <p>4 A. No. Well, if I could look at OPUS, I could help but if</p> <p>5 not –</p> <p>6 Q. In fact we have heard from Ms Sharon Ross already about</p> <p>7 that, that Mr Grainger was arrested but not charged for</p> <p>8 it.</p> <p>9 A. Right.</p> <p>10 Q. Looking at this, pages 727 and 737 collectively, are</p> <p>11 there no other unsubstantiated allegations that</p> <p>12 Mr Grainger committed section 18 or section 20 offences?</p> <p>13 A. No. I think you have highlighted them all.</p> <p>14 Q. I have looked at them all?</p> <p>15 A. Yes.</p> <p>16 Q. Okay.</p> <p>17 So the three things I have been through are all of</p> <p>18 the unsubstantiated allegations of Anthony Grainger,</p> <p>19 except robbery, that we are going to come to in</p> <p>20 a moment?</p> <p>21 A. Yes.</p> <p>22 MR BEER: Can we turn then to robbery.</p> <p>23 I am told it is 1.00. That might be a convenient</p> <p>24 moment because it is a new subtopic.</p> <p>25 THE CHAIRMAN: Certainly. 2.05 then.</p> <p style="text-align: center;">Page 93</p>	<p>1 a series of robberies that ended in a robbery in</p> <p>2 Ashton-on-Ribble. You see that Mr Grainger is said to</p> <p>3 be eliminated from this offence, here?</p> <p>4 A. Yes.</p> <p>5 Q. Does that mean that, I think, consistently with the</p> <p>6 evidence that you gave earlier, a positive decision was</p> <p>7 made that there wasn't evidence --</p> <p>8 A. Sufficient evidence.</p> <p>9 Q. -- to take it further?</p> <p>10 A. Yes.</p> <p>11 Q. It doesn't tell us whether he was arrested or not.</p> <p>12 A. No, it does show as "Detected", which would indicate</p> <p>13 that there has been some positive action on that crime.</p> <p>14 So, the last column, where it says "Crime status:</p> <p>15 detected", you would have to have a look into the actual</p> <p>16 crime.</p> <p>17 Q. That doesn't mean it is detected as against him, it</p> <p>18 means the crime was detected --</p> <p>19 A. Yes.</p> <p>20 Q. -- rather than he was implicated in it.</p> <p>21 A. Yes.</p> <p>22 Q. Okay.</p> <p>23 So that is the first one. I am doing these in,</p> <p>24 I think, rather reverse date order. Turn then to other</p> <p>25 alleged robberies in 2006, and look at Operation Ascot.</p> <p style="text-align: center;">Page 95</p>
<p>1 MR BEER: Thank you, sir.</p> <p>2 THE CHAIRMAN: Thank you.</p> <p>3 (1.00 pm)</p> <p>4 (The Luncheon Adjournment)</p> <p>5 (2.05 pm)</p> <p>6 THE CHAIRMAN: Yes, Mr Beer.</p> <p>7 MR BEER: Thank you, sir.</p> <p>8 Mr Cousen, I had dealt with Mr Grainger's</p> <p>9 convictions.</p> <p>10 A. Yes.</p> <p>11 Q. I had dealt with the unsubstantiated allegations of the</p> <p>12 use of violence by him.</p> <p>13 A. Yes.</p> <p>14 Q. I want to now turn to the unsubstantiated allegations of</p> <p>15 involvement in robbery involving him.</p> <p>16 A. Yes.</p> <p>17 Q. Can we look, please, at an incident that was alleged to</p> <p>18 have happened between 12 and 28 April 2006. That is in</p> <p>19 our C bundle, I am not sure which one of yours it is,</p> <p>20 but I am at 727.</p> <p>21 A. Yes.</p> <p>22 Q. Can you see the second entry on there: robbery between</p> <p>23 12 April and 28 April 2006?</p> <p>24 A. Yes.</p> <p>25 Q. Our understanding is that this relates to a robbery or</p> <p style="text-align: center;">Page 94</p>	<p>1 Were you aware of Operation Ascot by March 2012?</p> <p>2 A. Not Operation Ascot. I was aware of one of the crimes,</p> <p>3 it featured on the intelligence profile.</p> <p>4 Q. Yes.</p> <p>5 A. Or pen picture.</p> <p>6 Q. Did you know that Operation Ascot related to other</p> <p>7 alleged robberies in 2006?</p> <p>8 A. I do now.</p> <p>9 Q. Yes.</p> <p>10 A. But, no, I didn't know then.</p> <p>11 Q. Okay.</p> <p>12 I wonder if we could look, please, at file C/54,</p> <p>13 page 54.</p> <p>14 A. Yes.</p> <p>15 Q. This is part of the pen profile I think you were just</p> <p>16 referring to; is that right?</p> <p>17 A. No, actually, sorry, it is not. It is the one for</p> <p>18 Anthony, and I think actually it refers to an earlier</p> <p>19 robbery. If I could just --</p> <p>20 Q. This is part of Mr Totton's nominal profile?</p> <p>21 A. Yes. Sorry, no, the one I was referring to is actually</p> <p>22 1995. There is a crime number.</p> <p>23 Q. Let's put that to one side.</p> <p>24 A. Sorry.</p> <p>25 Q. Let's look at this one, which is part of Mr Totton's</p> <p style="text-align: center;">Page 96</p>

<p>1 intelligence, or nominal profile. It says, at the 2 second paragraph, in 54: 3 "Mr Grainger was arrested in 2006 for conspiracy to 4 commit armed robberies at various financial 5 institutions, in GMP. Totton, along with Grainger, 6 Aaron Travers and Jay Donaldson, were eliminated and 7 Murphy and Barker were convicted." 8 Again, does that use of "eliminated" imply some 9 positive establishment that he had not committed the 10 offence? 11 A. Had not been prosecuted. 12 Q. Does it just mean they have not been prosecuted; what 13 does it mean, "eliminated"? 14 A. It does mean they have not been prosecuted, but they 15 could have been arrested. It might have been that they 16 have never been arrested, a decision had been taken 17 by -- for example, somebody's supervisor could have 18 said, "There is no need to pursue this crime. There is 19 not enough information to pursue it", so it would 20 suggest, certainly, that not prosecuted. 21 Q. Right. Can we turn then to the robbery of a Lloyds TSB 22 in Kirkham, in Preston in 2005. Can you help us in 23 general terms -- we can put C away now -- what 24 information you were given about the robbery in Kirkham, 25 in Preston, in 2005?</p> <p style="text-align: center;">Page 97</p>	<p>1 or named in any way? 2 A. Certainly, from any intelligence that I had, yes. 3 Q. Thank you. 4 Okay, we can put that away now, as well. 5 Going back a little further in time, that the 6 robbery in Bolton -- or a robbery in Bolton in 2000. 7 I wonder whether we could look, please, at G2, 8 page 1400. 9 A. Yes. 10 Q. This is, I think, a printed crime report for the robbery 11 with which I am concerned, in Bolton, on 13 April 2000. 12 A. Yes. 13 Q. If you look through that, I think it goes right up to 14 1412. 15 A. Yes. 16 Q. That finishes at 1411 and every other page is blank. 17 A. Yes. 18 Q. I think you can see that there is no mention of 19 Mr Grainger being connected to that in any way. 20 (Pause) 21 A. It just offers descriptions. I don't think it does name 22 anybody. 23 Q. You have the arrests on 1406. 24 A. Sorry, yes. Yes. 25 No, his name is not on there.</p> <p style="text-align: center;">Page 99</p>
<p>1 A. That was the information that DC Mills had passed to me 2 via an email, which had come on the morning of 1 March. 3 Q. Shall we look at that together, then? 4 A. Yes, sure. 5 Q. File R, at page 11. 6 A. Yes. 7 Q. So is this an email on the morning of 1 March -- 8 A. Yes. 9 Q. -- 2012, 7.14 -- 10 A. Yes. 11 Q. -- from DC Mills to you, DC Hurst and DC Talbot? 12 A. Yes. 13 Q. We have all looked at this before, so I am not going to 14 read it out, but is that the extent of the information 15 that you were provided? 16 A. Yes. 17 Q. I think you can see, on the face of the document there, 18 that it doesn't mention Mr Grainger in any way? 19 A. No. 20 Q. Is that right? 21 A. Yes. 22 Q. Is it right that you were, therefore, only aware of 23 intelligence implicating Mr Totton? 24 A. David Totton, yes. 25 Q. And that Mr Rimmer and Mr Grainger were not implicated</p> <p style="text-align: center;">Page 98</p>	<p>1 Q. So there are seven people, I think, mentioned on there. 2 A. Yes. 3 Q. So no mention of Mr Grainger then, okay. 4 Then, can we go back further in time, and we can put 5 that one away, please. 6 The Post Office robbery in Prestwich, in 1995. Can 7 we look, please, at G2/759. 8 A. Yes. 9 Q. I think you can probably see, on 763, that Mr Grainger 10 is mentioned, second from bottom? 11 A. Yes. 12 Q. We have established, through other evidence, that 13 Mr Grainger, I think, was not tried for this offence; do 14 you know why not? 15 A. As I understand it now, there was -- all the subjects 16 were charged with a conspiracy to rob over a period of 17 time. It went to a trial and then, on a judge's 18 direction -- can I just check, is this the crime number 19 that is referred to in the pen picture? 20 Q. Yes. 21 A. Yes. 22 Yes, so that is the right answer then. 23 Q. There was a substantive offence on the indictment, 24 alleging robbery, we have established through some other 25 evidence.</p> <p style="text-align: center;">Page 100</p>

1 **A. Okay.**
 2 Q. Not against Mr Anthony Grainger. Do you know now why
 3 Mr Anthony Grainger was not charged or tried with this
 4 offence?
 5 **A. As I understand it, it was a direction of the judge.**
 6 Q. No, no. Why he didn't appear before the court charged
 7 with the offence, not why he was acquitted of it.
 8 THE CHAIRMAN: You understand now we are talking about
 9 a separate charge, not the charge of conspiracy to rob.
 10 MR BEER: The charge of conspiracy to rob was dismissed on
 11 the judge's direction because there was insufficient
 12 evidence fit to leave to a jury.
 13 **A. Okay.**
 14 Q. The charge we are looking at now was something
 15 Mr Grainger never faced.
 16 **A. Right. No. I didn't know that.**
 17 Q. You didn't even know that, no.
 18 **A. No.**
 19 Q. I think you, common with others, thought that the
 20 mistake that the PC Griffiths had made was wrongly
 21 saying it had been left to lie on the file.
 22 **A. I think what is fair to say is that, when I have looked**
 23 **at the pen picture, I have actually -- because it is**
 24 **an old crime -- I think I mentioned to you earlier we**
 25 **have another system called GMPics, and there is more**

Page 101

1 **information on the GMPics crime than what is shown here.**
 2 Q. There is more information on the GMPics than is shown on
 3 this crime report?
 4 **A. Yes.**
 5 Q. What additional information is there on GMPics?
 6 **A. It would show updates that the officer has put on in**
 7 **relation to what has happened during the investigation,**
 8 **who has been charged, if they are waiting for forensic**
 9 **inquiries. So I have a printout if you want me to show**
 10 **you.**
 11 Q. Yes, I don't think it is something we have seen before.
 12 **A. The GMPics system, as I explained earlier, that was kind**
 13 **of in force till -- I don't know if it was 2001 or 2002,**
 14 **there or thereabouts. I did explain, before, the**
 15 **offences column on the crime summary, that is dragged**
 16 **from GMPics. GMPics contained more information than**
 17 **what the OPUS record. So, obviously, when I have**
 18 **received the pen picture, when I have actually looked at**
 19 **it, then I have looked on to the crime.**
 20 Q. You are telling us that when you received
 21 Anthony Grainger's pen picture, you saw the reference to
 22 the Preston robbery?
 23 **A. To this one. No, it's Prestwich.**
 24 Q. Sorry, Prestwich robbery.
 25 **A. Yes.**

Page 102

1 Q. And you followed it through?
 2 **A. When you say, "Followed it through" --**
 3 Q. On to GMPics?
 4 **A. I have read it on GMPics, yes, because it contained more**
 5 **information. And, as I have alluded to --**
 6 Q. I don't think we have heard this before, so ...
 7 **A. I have read it on the GMPics system, and the GMPics**
 8 **system, in a nutshell -- I would have to bring the**
 9 **printout in for you, but it explains there is a number**
 10 **of people who have been arrested, that there are going**
 11 **to be more arrests. And then when Anthony and others**
 12 **get arrested, it then gets updated and they have now**
 13 **been charged with conspiracy to rob, and I think it is**
 14 **over about a nine month period, or there or thereabouts,**
 15 **and then it shows, actually, the disposal.**
 16 **And in relation to the four or five who were**
 17 **actually named on the conspiracy crime, it actually --**
 18 **there is an entry --**
 19 Q. Four.
 20 **A. -- it just says "Grainger", then, "Lie on file" or**
 21 **"Refer to file". I can't remember exactly the words.**
 22 Q. So, back in 2012 --
 23 **A. Yes.**
 24 Q. -- you access GMPics to look at this?
 25 **A. Yes.**

Page 103

1 Q. Is the print that you have now, the print from 2012?
 2 **A. No, because, to be fair, I wouldn't have printed it out**
 3 **back in 2012. I would have just -- I would have**
 4 **looked -- because that entry that Rachel made gave**
 5 **a crime number, because I knew that the crime would**
 6 **contain more information on GMPics, that is what I would**
 7 **have looked at and that is what I would have seen. It**
 8 **is the same thing. It is a really old system, so**
 9 **whatever I print off today would be the same to whatever**
 10 **had I printed it off, but I wouldn't have printed it**
 11 **off.**
 12 Q. So you looked at it on the system, and why did you do
 13 that?
 14 **A. Because it contained more information than what the OPUS**
 15 **would contain.**
 16 Q. Did you look at, for example, the PNC warning signals to
 17 see what they were all about?
 18 **A. Sorry, for? In relation to this crime?**
 19 Q. For Anthony Grainger?
 20 **A. No, I wouldn't have looked on -- as the SIO, I wouldn't**
 21 **be the person that would automatically -- I would get**
 22 **a printout but I would not automatically go through ...**
 23 Q. Did you look at his OPUS warning signals to see what the
 24 underlying material was in relation to those?
 25 **A. I can't remember if I did or if I didn't. If they are**

Page 104

1 **on a profile, then they have got to be on there**
 2 **because -- and there has to be some rationale behind why**
 3 **they are on that system.**
 4 Q. We will come back to that in a moment.
 5 So the only recollection that you have is checking
 6 GMPics for the entry on the pen picture for
 7 Anthony Grainger prepared by PC Griffiths that referred
 8 to the 1995 Prestwich robbery.
 9 **A. Yes, because she specifically put a crime number on**
 10 **there, so my thoughts were: if I take that into**
 11 **a briefing at any point -- bearing in mind, that was not**
 12 **produced until after the February -- sorry**
 13 **the January/February deployment that you referred to**
 14 **earlier. I knew if I was going to go back to a firearms**
 15 **cadre at any point, and if I was going to produce the**
 16 **profile, then I would be asked the question and so**
 17 **I needed to know what the answer was.**
 18 Q. When did you remember doing this?
 19 **A. Sorry, when did I remember checking the ...**
 20 Q. The GMPics?
 21 **A. The GMPics?**
 22 **Well, obviously, I have done it at the time, haven't**
 23 **I? I can't say exactly what dates I got the profile off**
 24 **DS Hurst, but I know, for a fact, that because GMPics**
 25 **contained more information -- I had been brought up on**

Page 105

1 **GMPics because when I joined the police, OPUS had come**
 2 **in after I had joined the police. So GMPics was my kind**
 3 **of bread and butter. I still use GMPics now and other**
 4 **staff don't use GMPics.**
 5 Q. We know DS Hurst sent it to you on 7 February, the
 6 profile, the day she received it herself.
 7 **A. I think that might be slightly mistaken, sir.**
 8 Q. Can we look at bundle W, please.
 9 **A. Yes.**
 10 Q. When you say it "might be slightly mistaken", do you
 11 mean it was not forwarded to you; that your attention
 12 was not drawn to it?
 13 **A. I don't think it was an attachment on the email.**
 14 Q. So you were made aware, on 7 February, that it was on
 15 there, on the system, on the S: drive?
 16 **A. It was on the S: drive, yes.**
 17 Q. Right, from 7 February, we need not go to the email.
 18 **A. Yes.**
 19 Q. So it was after that date that you checked it, checked
 20 GMPics?
 21 **A. Yes.**
 22 Q. So you looked through the pen picture and thought: this
 23 stands out.
 24 It was in bold and red I think, wasn't it?
 25 **A. I think it was the only crime referred to.**

Page 106

1 Q. What did you discover?
 2 **A. On the GMPics crime?**
 3 Q. Yes.
 4 **A. Well, that told me that there was five or six people**
 5 **that had been arrested.**
 6 Q. Who were they?
 7 **A. There was Stuart Grainger, Anthony Grainger --**
 8 Q. Arrested for a robbery committed on 9 October 1995?
 9 **A. Sorry, if you -- yes -- if you look at the crime report**
 10 **on the offender page. Right, so the --**
 11 THE CHAIRMAN: Do you have a page reference, sorry?
 12 MR BEER: 763.
 13 **A. So those five names, that information he has dragged**
 14 **from GMPics, the information that is showing on OPUS**
 15 **there.**
 16 Q. Right.
 17 **A. Okay? So those five names were all shown.**
 18 **Now, on GMPics, they are probably shown as**
 19 **"Accused". I would have to look at the --**
 20 Q. Have you brought it with you?
 21 **A. Yes, I have.**
 22 MR BEER: Rather than doing this from memory, sir, I wonder
 23 whether we might rise to look at the document that the
 24 officer has brought?
 25 THE CHAIRMAN: Certainly. I am not sure about that last

Page 107

1 page reference. I should have been putting some of
 2 these files away, but 763 does not seem to have --
 3 MR BEER: G2/763.
 4 THE CHAIRMAN: I am looking at the wrong one.
 5 Can I just have a second before I rise, just to tidy
 6 these up a little bit, because that will help.
 7 MR BEER: Yes.
 8 THE CHAIRMAN: Yes, I have that one, that is there.
 9 (Pause)
 10 How long would you like, five minutes or more?
 11 MR BEER: A bit more, maybe ten minutes, sir, to read the
 12 document, please.
 13 (2.28 pm)
 14 (A short adjournment)
 15 (2.43 pm)
 16 MR BEER: Thank you, sir.
 17 Just to explain, we have been given a document that
 18 I think was printed on 12 February 2017, so Sunday.
 19 THE CHAIRMAN: Yes.
 20 MR BEER: It is in an original form, so it contains some
 21 personal and private information as to complainants, and
 22 phone numbers and things of that sort.
 23 THE CHAIRMAN: Yes.
 24 MR BEER: So it needs to be reviewed by GMP for redaction,
 25 so we are proposing to give it back to GMP to ask them

Page 108

<p>1 to redact it for tomorrow --</p> <p>2 THE CHAIRMAN: Yes.</p> <p>3 MR BEER: -- and then distribute it tomorrow or by tomorrow.</p> <p>4 THE CHAIRMAN: Right.</p> <p>5 MR BEER: Then I will return to this topic tomorrow or the</p> <p>6 next day.</p> <p>7 THE CHAIRMAN: Yes, thank you Mr Beer. I understand the</p> <p>8 position.</p> <p>9 MR BEER: Thank you.</p> <p>10 So we are going to park all of that, the 1995 issue</p> <p>11 for the moment.</p> <p>12 A. Okay.</p> <p>13 Q. Can you help us, have you any other documents in your</p> <p>14 bag or brief case that you are aware haven't been</p> <p>15 disclosed to the Inquiry?</p> <p>16 A. Sorry, I have just passed the -- I mentioned about the</p> <p>17 COPU, I have just --</p> <p>18 Q. You have passed those over?</p> <p>19 A. -- passed that over.</p> <p>20 Q. Other than those two categories of document?</p> <p>21 A. No, not that I am --</p> <p>22 Q. Not that you are aware of.</p> <p>23 When you were asked about this robbery previously,</p> <p>24 when you were interviewed, you said that the fact that</p> <p>25 the charge was dismissed against Mr Grainger,</p> <p style="text-align: center;">Page 109</p>	<p>1 "The CPS allege that Anthony Grainger's profile</p> <p>2 contained erroneous information, in that proceedings in</p> <p>3 respect of an offence in the course of which a sawn-off</p> <p>4 shotgun was used were ordered to lie on the file in this</p> <p>5 case. The profile was in fact correct, as</p> <p>6 Anthony Grainger was charged with conspiracy to commit</p> <p>7 robbery in 1996/1997 and, during the trial, the case was</p> <p>8 dismissed against him and others, although it was</p> <p>9 allowed to lie on file against his brother,</p> <p>10 Stuart Grainger. Rachel Griffiths, who has produced a</p> <p>11 profile ..."</p> <p>12 And you say, "Yes":</p> <p>13 "... had already said it was a mistake on her part."</p> <p>14 And you say, "Yes". Then Mr Foulkes says:</p> <p>15 "But she just recorded Anthony Grainger's as being</p> <p>16 a lie on file."</p> <p>17 You said, "Yes". Then, Mr Foulkes said:</p> <p>18 "The truth of the matter is Anthony Grainger was</p> <p>19 charged with that offence, went to trial and the case</p> <p>20 was dismissed against him and a few of the others."</p> <p>21 We will investigate tomorrow whether that was</p> <p>22 accurate or not.</p> <p>23 You say, "Yes". Then, Mr Foulkes says:</p> <p>24 "Even though it would be argued that the evidence</p> <p>25 was overwhelming against them --"</p> <p style="text-align: center;">Page 111</p>
<p>1 Anthony Grainger, and ordered to lie on the file against</p> <p>2 Stuart Grainger, that was your then understanding of</p> <p>3 what the position was.</p> <p>4 A. Yes.</p> <p>5 Q. Dismissed against Anthony Grainger, lie on the file</p> <p>6 against Stuart Grainger, it wouldn't have made any</p> <p>7 difference to you if it had been revealed either that</p> <p>8 Mr Anthony Grainger had not been charged with it, or --</p> <p>9 A. If he had not -- sorry, if he had not been charged?</p> <p>10 Q. Let's have a look at exactly what you say. Tab 7 in</p> <p>11 your bundle, page 377.</p> <p>12 A. Sorry, which bundle is it?</p> <p>13 Q. Your witness bundle.</p> <p>14 A. Sorry, tab 7, which page is it?</p> <p>15 Q. 377.</p> <p>16 A. Okay, yes.</p> <p>17 Q. So this is part of your interview, conducted by</p> <p>18 Mr Foulkes and Mr Preston, on 14 November 2014, for the</p> <p>19 purposes of the defence of the chief constable in the</p> <p>20 health and safety prosecution.</p> <p>21 A. Yes.</p> <p>22 Q. It is put to you, the allegation at the top of the page</p> <p>23 there, on to 3, it says "Mr Foulkes", which is the third</p> <p>24 allegation made by the IPCC in their list, seem to have</p> <p>25 got on quickly there:</p> <p style="text-align: center;">Page 110</p>	<p>1 And you say, "Yes", and Mr Foulkes continues:</p> <p>2 "But that is another point. So that the allegation</p> <p>3 that has been made, the fact that mistake was made on</p> <p>4 a profile, would that have made any difference to the</p> <p>5 decisions that were made by you or made any difference</p> <p>6 to your decision-making process?"</p> <p>7 And you say:</p> <p>8 "No, absolutely not, like I said."</p> <p>9 Then you say he was a lot lower down the profile.</p> <p>10 A. Yes.</p> <p>11 Q. Firstly, on what basis did you agree the that the</p> <p>12 evidence was overwhelming against Mr Grainger?</p> <p>13 A. I think, by that point, I had seen the case summary for</p> <p>14 Operation Ascot, which I think was -- no, this one is</p> <p>15 not Ascot, is it, it is Operation Vulture?</p> <p>16 Q. Vulture, 1995.</p> <p>17 A. Which I think the officer in the case was Derek McGlone,</p> <p>18 so I think by that point I had seen the papers or the</p> <p>19 MG5, the summary of evidence.</p> <p>20 Q. Right, so you thought that, on the evidence that we</p> <p>21 have, Mr Grainger was not charged with the</p> <p>22 9 October 1995 robbery. He was charged with</p> <p>23 a conspiracy, but for dates in May 2006 and it was</p> <p>24 dismissed by the judge as not fit to go to the jury and</p> <p>25 a defendant's costs order was made.</p> <p style="text-align: center;">Page 112</p>

1 What evidence were you referring to where you agreed
 2 it was overwhelming against him.
 3 **A. Just seeing the summary of evidence.**
 4 Q. Why was it overwhelming against Mr Grainger? What was
 5 the overwhelming evidence for a crime that he was not
 6 charged with?
 7 **A. I can't remember without getting -- well, just bearing**
 8 **in mind at that point, my understanding was it was**
 9 **a conspiracy over a period of time, so from one date to**
 10 **another date, and you will see that when you look at the**
 11 **document tomorrow.**
 12 Q. Yes.
 13 **A. So I had also then seen the MG5, the summary of**
 14 **evidence, produced by DC McGlone and that was what my**
 15 **personal view was.**
 16 Q. And you knew none of this on 3 March 2012?
 17 **A. No.**
 18 Q. It was the only information you had then was what the
 19 officer had put, Peter Griffiths had put in the profile
 20 and in the GMPics that we are going to look at; is that
 21 right?
 22 **A. Yes.**
 23 Q. Does it amount to this: on the information that the
 24 officer had put in the GMPics, and the information in
 25 the profile, you were happy for that profile to remain

Page 113

1 unaltered?
 2 **A. Yes.**
 3 Q. And to go forward to the TFU, to base decisions on
 4 deployment and then, subsequently, decisions about what
 5 officers should be briefed about?
 6 **A. No, it is not the basis of a profile, the firearms team**
 7 **get deployed, absolutely not. The basis of the profile**
 8 **is to give me the information I need to be able to brief**
 9 **the tactical firearms commander, and then it is the**
 10 **extra information that I have in relation to**
 11 **surveillance, any other intelligence that I am privy to**
 12 **at that point. The profile isn't the basis, and that is**
 13 **the point that I am trying to explain to you. Whether**
 14 **it is David Totton's profile, whether it is Anthony's**
 15 **profile, whether it is Robert Rimmer's profile, that**
 16 **wasn't the basis for firearms authority.**
 17 Q. I think we will see in a moment that you emailed them to
 18 the TFU, the three profiles; Rimmer, Grainger and
 19 Totton?
 20 **A. On 1 March, yes.**
 21 Q. If it was not the basis of a briefing for them, why did
 22 you email them to them?
 23 **A. I emailed them to Mike Lawler. I think if we can look**
 24 **at the email, it will be time stamped and I can give you**
 25 **the time.**

Page 114

1 Q. I am not after the time at the moment.
 2 **A. It is important to me, if I could just have a look at**
 3 **that, because the meeting was at 12.30. The reason why**
 4 **it was emailed to him was so he would have those**
 5 **documents prior to me attending.**
 6 Q. What, you would send him the documents and say, "Don't
 7 look at them", when you met him?
 8 **A. That would be rather foolish, wouldn't it?**
 9 Q. That is why I am asking.
 10 **A. No, I would not say that to him, of course.**
 11 Q. Why would you send him the documents?
 12 **A. Because I am going to be travelling to a briefing at**
 13 **12.30. Clearly, he is not going to have enough time to**
 14 **read all those documents, but it is clearly something**
 15 **that I am also going to be referring to, and it is not**
 16 **something that he has done on every occasion.**
 17 Q. Why did you do it on this occasion?
 18 **A. Because I had 45 minutes to get myself to -- I think it**
 19 **was 45 minutes. I think the email was sent, if you**
 20 **would give me the courtesy to have a look at my email.**
 21 Q. I am trying to be courteous to you, I am just looking
 22 for the reference whilst you are talking.
 23 **A. I think it is 11.45 or thereabouts. I was then going to**
 24 **be attending at the Tactical Firearms Unit.**
 25 Q. Yes, it is the W file, you might want to tidy up your

Page 115

1 folders there.
 2 When you have cleared the decks ...
 3 **A. Sorry, yes, thank you.**
 4 Q. W/79.
 5 **A. Thank you.**
 6 **In fact, it is a little later. It is 11.57. So**
 7 **I would have been leaving shortly after this to attend**
 8 **at the Tactical Firearms Unit, so that would give**
 9 **Mr Lawler a chance, if he wished to, to peruse those**
 10 **documents before I got there.**
 11 Q. Why would you send him the profiles if they were not to
 12 be the basis on which a TFC would make his decisions?
 13 **A. Because I am going to be taking them with me. When I go**
 14 **to the briefing, I will be taking those documents with**
 15 **me. So if I am going to be referring to them, he may**
 16 **ask for a copy of the document. I don't take copies of**
 17 **everything that I am going to be taking.**
 18 **Like I said, it is not something that is done on**
 19 **every occasion, but given that he may be asking me**
 20 **questions on them, then it is prudent that he might have**
 21 **a chance to look at them.**
 22 Q. Do you make clear to him that he shouldn't use the
 23 information in the profiles for the purposes of briefing
 24 up his officers?
 25 **A. No.**

Page 116

<p>1 Q. What use, if any, do you say he should make with the 2 information in the profiles?</p> <p>3 A. Well, the information in the profiles -- what happens 4 when I go and brief up Mr Lawler, Mike Lawler, is I will 5 give him a briefing in terms of what intelligence have 6 I got on this OCG, starting at the beginning of 7 Operation Shire. I will then start to talk through who 8 the subjects are. By this time, Anthony had been 9 identified. It was the first occasion when Anthony was 10 briefed on in any detail, at all.</p> <p>11 Q. When we come on to look at the profiles for each of the 12 three subjects, we will see information concerning their 13 warning markers in there. Then, when we look at 14 Mr Lawler's PowerPoint, we will see it has been lifted 15 straight from the profile and put in; yes?</p> <p>16 A. Yes, we can have a look. Yes.</p> <p>17 Q. Is that something that you anticipated might occur; that 18 there would just almost be a cut and paste or a direct 19 lift of the warning markers?</p> <p>20 A. Yes, you get asked. On a briefing, you will be asked: 21 is there any warning markers? And you will say: yes, it 22 is Victor India for violence or Whisky Echo for weapons, 23 so I would have been asked that in any case.</p> <p>24 Q. You had researched, had you, what lay behind the warning 25 markers?</p> <p style="text-align: center;">Page 117</p>	<p>1 MR BEER: Can you see, in the profile that was available to 2 you from 7 February onwards, for Mr Anthony Grainger --</p> <p>3 A. Yes.</p> <p>4 Q. -- there is a Victor India warning marker, where it says 5 that it is for affray, 4 December 1997?</p> <p>6 A. Yes.</p> <p>7 Q. We can see that, I think, in the PNC record, at 759.</p> <p>8 A. Yes.</p> <p>9 Q. So it seems that the basis for the warning marker was 10 the 1997 driving incident?</p> <p>11 A. Yes. Is that 4 December?</p> <p>12 Q. Yes, it was.</p> <p>13 A. Yes.</p> <p>14 Q. So you did not look to see what the offence of affray in 15 fact was an offence for which Mr -- I think we have 16 established Mr Grainger was not convicted. He not being 17 convicted of any offences of violence.</p> <p>18 A. Yes.</p> <p>19 Q. You didn't look behind this --</p> <p>20 A. No.</p> <p>21 Q. -- to see what it related to?</p> <p>22 A. No.</p> <p>23 Q. You were telling us that the FIB are the subject matter 24 experts --</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 119</p>
<p>1 A. No.</p> <p>2 Q. Why not?</p> <p>3 A. Because I had been presented with profiles in relation 4 to the subjects of the operation. It has been -- the 5 profiles have been produced for me by the Force 6 Intelligence Bureau. That is -- one of their functions 7 is, obviously, to produce profiles. They are 8 specialists in that area of work. It is intelligence, 9 the clue, I suppose, is in the title. So I wouldn't 10 have to check, unless I was asked by the cadre to say, 11 "What does this marker relate to?"</p> <p>12 Q. We will go through the markers if we can, then.</p> <p>13 A. Yes.</p> <p>14 Q. File C, please, at page 759.</p> <p>15 A. Sorry, 975?</p> <p>16 Q. Sorry, that is a rogue reference.</p> <p>17 THE CHAIRMAN: Yes.</p> <p>18 MR BEER: We will try -- let's look at the PNC record first, 19 then. It was C/759. Are you there?</p> <p>20 A. Yes.</p> <p>21 Q. Then, if you can also have open C/25 at the same time, 22 please.</p> <p>23 THE CHAIRMAN: C/759 and?</p> <p>24 MR BEER: C/25.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 118</p>	<p>1 Q. -- in this.</p> <p>2 I think you would understand that the PNC records 3 warning markers on the basis of convictions?</p> <p>4 A. Yes, convictions or arrests.</p> <p>5 Q. Charges?</p> <p>6 A. Yes.</p> <p>7 Q. It can be acquittals, arrests or even just some 8 intelligence?</p> <p>9 A. Yes.</p> <p>10 Q. It can be a wide range of offending in relation to any 11 particular marker.</p> <p>12 A. Yes.</p> <p>13 Q. So wouldn't you want to know where in the spectrum of 14 offending this sat?</p> <p>15 A. The affray or the drugs?</p> <p>16 Q. I am talking about the affray.</p> <p>17 A. No, not necessarily. Affray is one up from a section 4 18 public order.</p> <p>19 Q. So it is pretty low?</p> <p>20 A. Yes.</p> <p>21 Q. Did you pick up the fact that, in Mr Totton and 22 Mr Rimmer's profiles, there was no information given 23 about what the offence was, next to the warning marker?</p> <p>24 A. No.</p> <p>25 Q. Let's just look at those. In Mr Totton's, if you go to</p> <p style="text-align: center;">Page 120</p>

1 page 44 of the same bundle --
 2 **A. Yes.**
 3 Q. -- that is where it starts.
 4 **A. Yes.**
 5 Q. Then, if you look at 46, it says:
 6 "Warning markers: firearms, violent or weapon on
 7 OPUS. Weapons and violent."
 8 **A. Yes.**
 9 Q. Wouldn't you want to know what that meant?
 10 **A. I think it probably gives some information in the actual**
 11 **profile, in relation to that.**
 12 Q. So you are talking about under section 2; yes?
 13 **A. Yes.**
 14 Q. Of the profile, on pages 46, 47 and 48?
 15 **A. Yes.**
 16 Q. That is the information that sits behind it.
 17 **A. Yes. And the point with the warning markers, obviously,**
 18 **they go on to the system, and to go on to the system,**
 19 **somebody has had to put -- if somebody is arrested, then**
 20 **they have to put a descriptive form in which explains**
 21 **why that warning signal is justified. The same thing**
 22 **being on the OPUS system. If they went to put a marker**
 23 **on, there has to be some justification. Then the**
 24 **warning signal goes on to the system. Once it is on to**
 25 **the system, there is then, within GMP, a department**

Page 121

1 **which will then review these markers.**
 2 Q. Yes, so you work on the basis that the system is
 3 operating properly, there is a presumption that
 4 everything is working, and therefore: if it is on the
 5 system, I can rely on it.
 6 **A. Yes.**
 7 Q. Would you not want to know whether this is just
 8 information only or whether it resulted in a conviction,
 9 ie --
 10 **A. Sorry, which information now are we talking about?**
 11 Q. Any of it, the affray. We know that didn't. We know --
 12 **A. I think the warning signals for Anthony were not**
 13 **something that caused me undue concern when I was**
 14 **deploying surveillance teams, et cetera. It is not**
 15 **something that caused me any undue concern.**
 16 **So when you are looking at David Totton --**
 17 Q. Yes, just tell us why Mr Grainger's warning signals
 18 didn't cause you any concern.
 19 **A. Because of the possession of drugs, you can probably**
 20 **look at 90 per cent of people who were on the GMP**
 21 **intelligence system, who will have a Delta Romeo marker.**
 22 **They get caught with a spliff, they will have a Delta**
 23 **Romeo marker.**
 24 **In terms of the affray, I think -- let me jump back**
 25 **to it. The affray is 1997. It is not something that**

Page 122

1 **would have caused me any immediate concerns at the time.**
 2 **How many years after were we? 14 years after the event?**
 3 **So it is not anything that caused undue concern.**
 4 Q. Would you expect a firearms team to be briefed that
 5 Mr Grainger had a warning signal for being violent?
 6 **A. Yes, there was, obviously -- well, it is on the**
 7 **briefing, on 26 January. They have pulled the**
 8 **information from the profile of David Totton, because on**
 9 **David Totton's profile --**
 10 Q. I am asking you: would you expect a firearms team to be
 11 briefed, on 3 March, that Mr Anthony Grainger had
 12 a warning signal for being violent?
 13 **A. They would have had -- they would have been briefed on**
 14 **that, yes.**
 15 Q. Would you expect them to be, given that this was one up
 16 from a section 4 and didn't cause you any concern?
 17 **A. No, they would always be given the warnings. It was**
 18 **a standard question.**
 19 Q. But why? Why would they always be given the warnings?
 20 **A. I think there is even a box on the form which says they**
 21 **have to put the markers. Whoever the subject is,**
 22 **I think they have to put whatever those markers are.**
 23 **I don't know without looking at a TFC log, but you will**
 24 **always get asked the question: who is the person? Date**
 25 **of birth? Dah, dah, dah, dah ... What markers have they**

Page 123

1 **got? This is the markers that they've got ...**
 2 Q. So markers are quite an important piece of information?
 3 **A. If it is of interest to the TFC, I may need to then**
 4 **explore it further. But it is certainly given on --**
 5 **certainly, as I remember, on every firearms deployment,**
 6 **you will give whatever the markers are.**
 7 Q. Would you not want to explore a little more then, about
 8 what the real information is that underlines that?
 9 **A. I know you have asked me several times, but it was**
 10 **an affray from 1997. It didn't cause me any undue**
 11 **concern.**
 12 Q. In fact, it was a non-affray, wasn't it? It was a piece
 13 of dangerous driving.
 14 **A. As far as I was aware, at the time.**
 15 Q. But that is what you would have discovered if you had
 16 researched it; do you see?
 17 **A. Well, it was -- there as an affray for --**
 18 Q. I know, but that is the reason for me asking it. If you
 19 had looked into it, you would have researched it and
 20 found it out, wouldn't you? There was no violence.
 21 **A. Okay. Well, there was actually violence. I didn't see**
 22 **the video for this until after the event, but if you**
 23 **watch the video, then you would say there was actually**
 24 **violence.**
 25 **In terms of what the court conviction was, then**

Page 124

1 **I agree with you. In terms of what was actually,**
 2 **physically took place, then I would disagree with you**
 3 **and say that, actually, there was violence used.**
 4 Q. There was no weapons marker on the PNC, was there, for
 5 Mr Grainger? We are looking at 759.
 6 **A. No.**
 7 Q. Does that mean that there was no conviction or, indeed,
 8 any intelligence to indicate that Mr Grainger used or
 9 carried weapons?
 10 **A. Yes, that he had been arrested or that anybody had found**
 11 **him in possession of any weapons. Yes, so intelligence**
 12 **or arrests; convictions.**
 13 Q. The OPUS record for Mr Grainger, which is at page 704 of
 14 this bundle --
 15 **A. Yes.**
 16 Q. -- does contain a weapons warning marker. Do you have
 17 that; 704?
 18 **A. No, sorry, I have not got that.**
 19 Q. We were looking at 759, it's in your right hand. If you
 20 go back in that to 704 --
 21 **A. Mine is 733, it finishes.**
 22 Q. Okay, it is the previous bundle, then. C/704.
 23 **A. Okay.**
 24 Q. Can you see that does contain a warning for weapons,
 25 with Mr Grainger?

Page 125

1 **A. Yes.**
 2 Q. Can you help us whether the criteria for inclusion of
 3 warning markers on OPUS are even broader than those on
 4 the PNC?
 5 **A. It can come from intelligence, it can come from**
 6 **convictions. Yes, a variety of different strands.**
 7 Q. So is the answer: yes, that it is broader, the criteria
 8 for inclusion of a warning marker on OPUS?
 9 **A. Yes.**
 10 Q. I don't think you knew --
 11 **A. In terms of -- yes, but you potentially have somebody**
 12 **who has not been arrested, but there is intelligence on**
 13 **the OPUS system which you would not expect to find --**
 14 **well, it wouldn't be on the PNC.**
 15 Q. Now, I don't think you knew this, did you, that there
 16 was a warning marker on OPUS?
 17 **A. For Anthony Grainger?**
 18 Q. That is who we are talking about, yes.
 19 **A. Yes. If I had looked at the OPUS profile, then I would**
 20 **have seen that. But, "I don't know", is the answer to**
 21 **that.**
 22 Q. Is that something that should have been on his profile?
 23 **A. Well, his profile, obviously, has been produced by the**
 24 **FIB. They have assessed -- or should I say**
 25 **Rachel Griffiths has assessed what she felt was relevant**

Page 126

1 **to go on to that intelligence profile.**
 2 Q. If you had seen a PNC record and an OPUS record that had
 3 different warning markers, would you expect them all to
 4 go on a profile?
 5 **A. Yes, some do.**
 6 Q. Do you mean some creators of profiles do?
 7 **A. Yes.**
 8 Q. And, what, some don't?
 9 **A. And, well, clearly.**
 10 Q. When you have subjects for a firearms operation, would
 11 you go back to OPUS and look at their profiles on OPUS?
 12 **A. Sometimes I would, yes.**
 13 Q. What would determine whether you did or whether you
 14 didn't?
 15 **A. Whether I felt I had enough information from the subject**
 16 **profile, whether I felt I had enough current**
 17 **intelligence, whether or not I actually got asked the**
 18 **question by the TFC.**
 19 Q. Do you know whether the OPUS system shows the basis for
 20 the inclusion of warning markers?
 21 **A. Sorry, do I know if?**
 22 Q. The OPUS system shows the basis for the inclusion of
 23 a warning marker?
 24 We have seen the PNC does. It tells you which
 25 offence, which date, who the owner of that crime was and

Page 127

1 the date it was last reviewed.
 2 **A. Yes, I would imagine you have to look through on OPUS.**
 3 **I don't think you can just click on to the warning and**
 4 **it take you to it. There's lots of different tabs on**
 5 **OPUS, I don't think there's a specific tab purely for**
 6 **that.**
 7 Q. So, as far as we can see, in any event, that facility,
 8 at least on the printed copy, is not available.
 9 **A. No.**
 10 Q. Are you aware of any basis for the warning marker on
 11 OPUS?
 12 **A. For the weapon?**
 13 Q. Yes.
 14 **A. Not immediately, as I stand here.**
 15 Q. So, I think you understood there was a relatively low
 16 threshold for inclusion and retention of warning markers
 17 on the PNC?
 18 **A. A low threshold? Well, it was a national policy what**
 19 **the threshold was. I wouldn't say that it was low or**
 20 **high. What I would say is what went on the PNC stayed**
 21 **on for a period of time, as dictated by national**
 22 **guidance.**
 23 Q. By, "A low threshold", I meant that it could be
 24 intelligence only, it needn't be conviction based.
 25 **A. No, it didn't have to be conviction based.**

Page 128

1 Q. Which is what I meant by, "A low threshold".
 2 **A. Sorry.**
 3 Q. You understood that; that it was a low threshold?
 4 **A. Well, that is your words, "A low threshold", it doesn't**
 5 **mean to say somebody has been convicted is --**
 6 Q. What did you understand --
 7 **A. -- if is that what your point is.**
 8 Q. What did you understand the threshold to be?
 9 **A. Well, I knew that if somebody gets arrested -- I had**
 10 **done this myself numerous times, as a PC and as**
 11 **a sergeant, when you arrest somebody. So if you find**
 12 **them in possession of drugs, you would ask, when you**
 13 **fill the descriptive form in for a Delta Romeo marker,**
 14 **or if you would arrest them for going equipped, it might**
 15 **be a knife or whatever.**
 16 Q. Would you call that a high threshold for inclusion of
 17 information?
 18 **A. Because they had been arrested?**
 19 Q. Yes.
 20 **A. I would not say it was any kind of threshold, I would**
 21 **just say it was guidance. It is there for officer**
 22 **safety, at the end of the day.**
 23 Q. You would not want to apply a descriptor to it, as to
 24 what kind of threshold needs to be passed in order to
 25 get a marker on the PNC?

Page 129

1 **A. No, there just has to be rationale.**
 2 Q. Given you know that there has just has to be some
 3 rationale for inclusion and retention on the PNC,
 4 wouldn't you always want to carry out some research to
 5 establish where in the spectrum of behaviour the
 6 information that sits behind the marker sits?
 7 **A. Sorry, are we going back to the PNC markers now or OPUS**
 8 **markers?**
 9 Q. Both.
 10 **A. No, it depends on who the individual is and what the**
 11 **markers are. They would look at the dates of whenever**
 12 **those markers went on the system, so it is individuals.**
 13 **Individual cases.**
 14 Q. So you don't think: whatever I am going to pass on here,
 15 I just need to be satisfied that this rather bald
 16 statement is accurate and reliable. I just want to look
 17 at the underlying material.
 18 You don't adopt a policy of doing that in every
 19 case?
 20 **A. No.**
 21 Q. It is on a case to case basis?
 22 **A. Yes.**
 23 Q. What would dictate which case you would do it in and
 24 which case you would not?
 25 **A. It depends what you are dealing with. It depends what**

Page 130

1 **you are dealing with, at that time. It depends what**
 2 **other information, intelligence, you have got.**
 3 **I pointed it out once or twice already. The basis**
 4 **of an investigation, when you are dealing with what in**
 5 **essence is a proactive operation is: what is your**
 6 **intelligence that is current at the time?**
 7 **That is a lot more important than what has been on**
 8 **the PNC in 1997, or in 1995. That is a lot more**
 9 **important, because that is the here and now. That is**
 10 **what we are dealing with.**
 11 Q. You know when the firearms officers are briefed up,
 12 because you were there on the 2nd and on the 3rd,
 13 weren't you, that they were not told about the current
 14 intelligence, were they? They were told about the
 15 warning markers, weren't they?
 16 **A. The warning markers would have featured on the actual**
 17 **PowerPoint presentation.**
 18 Q. Yes.
 19 **A. Yes.**
 20 Q. About the threat that these people posed; yes? That is
 21 what the firearms officers were told about the threat
 22 that these people posed.
 23 **A. That's what they are told and, indeed, on the very first**
 24 **briefing, if we go back to 26 January, when I didn't**
 25 **brief in relation to Anthony Grainger, Anthony Grainger**

Page 131

1 **was already on the briefing. Now, that was not from**
 2 **anything I briefed, that was from research that had been**
 3 **taken from the profile in relation to David Totton, and**
 4 **when I mentioned to you that there's officers within the**
 5 **Tactical Firearms Unit that will also do that research,**
 6 **that is where that information must have been grabbed**
 7 **from, because that is not information that I had**
 8 **presented.**
 9 Q. The suggestion has been put to you in the past, I think,
 10 that dated, misleading and unhelpful warning markers
 11 were passed to the TFU and were then relied on, hasn't
 12 it? That was the subject of the allegation, or one of
 13 them, that the IPCC put.
 14 **A. I don't -- if I could just have a look at it, just to**
 15 **kind of refresh my memory.**
 16 Q. Tab 6, page 74, please. It is your file, tab 6,
 17 page 74.
 18 **A. Thank you.**
 19 Q. The allegation is at the foot of page 73.
 20 It is at the bottom of page 73:
 21 "The CPS alleged that the subject profile which
 22 formed the basis of the Operation Shire intelligence in
 23 respect of Mr Grainger was not current and the PNC
 24 markers were dated in the extreme."
 25 **A. Yes.**

Page 132

1 Q. Then you proceed, over the next page and a bit, to
 2 answer that allegation.
 3 Part of your answer, if you look in between the
 4 hole-punches on page 74, is:
 5 "PNC markers are retained on a subject adhering to
 6 national guidelines. This is not a GMP policy, but
 7 a national one."
 8 **A. Yes.**
 9 Q. "Any assertion by the CPS that the warning signals are
 10 dated in the extreme should be addressed at a national
 11 level at the College of Policing. This is not something
 12 I can influence but it is fair to say the warning
 13 signals are considered as part of the risk assessment
 14 process."
 15 Yes?
 16 So what you were saying is: it is not down to me,
 17 take it up at a national level.
 18 **A. In relation to how long they are recorded on the system,**
 19 **yes.**
 20 Q. The allegation was not that they were recorded on there
 21 for too long, it is that they were relied on in the
 22 course of Operation Shire. In particular, in order to
 23 brief up the firearms team, on 3 March, isn't it?
 24 **A. They were briefed on the warning markers, yes.**
 25 Q. That is not a national issue, is it?

Page 133

1 **A. No, but if they are on the system, we can't not have**
 2 **them on the system. If they are on there, they are on**
 3 **there for a --**
 4 Q. If they are on the system, it doesn't mean you have to
 5 pass them on, does it?
 6 **A. No, it does, because I get asked the question by the**
 7 **tactical firearms commander.**
 8 Q. If it is on the system, it has to be passed on?
 9 **A. Yes, you have to pass it on.**
 10 Q. There is a law that says that, is there?
 11 **A. I don't think there is a law, sir.**
 12 Q. Where does it say you have to pass them on?
 13 **A. You have to pass that on. That is from professional**
 14 **experience dealing with tactical firearms commanders**
 15 **over a number of years.**
 16 Q. Have you seen it written down anywhere, that they have
 17 to be passed on? If there a warning marker on the
 18 system, it has to be passed on to the TFU?
 19 **A. I have not seen anything written down, but I have been**
 20 **on numerous briefings where I have conducted the**
 21 **briefing, where other people have conducted the**
 22 **briefings, numerous senior officers for firearms related**
 23 **investigations, and warning markers are always passed to**
 24 **the tactical firearms team.**
 25 Q. It is more custom than practice that warning markers are

Page 134

1 passed on?
 2 **A. I would argue that if I didn't do that, then I would be**
 3 **potentially holding back information that may be**
 4 **relevant to any question that they might want to ask me**
 5 **in that regard.**
 6 Q. But you only know that if you have investigated, really
 7 what the warning markers mean, don't you?
 8 **A. No.**
 9 Q. Why?
 10 **A. Because, as I have tried to explain, the warning signals**
 11 **are on the system; okay?**
 12 **There has to have been some rationale for them on**
 13 **the system.**
 14 Q. Which might be a good rationale or it might be a very
 15 bad one.
 16 **A. There is rationale and somebody has quality assured that**
 17 **to say: yes, it can go on the system.**
 18 Q. We have heard evidence already that this affray should
 19 never have remained on there. It should have come off
 20 between 2002 and 2008.
 21 **A. Sorry, who is that from?**
 22 Q. Ms Ross.
 23 **A. Okay, well, if that is a GMP error in that regard, that**
 24 **is not something that I was aware of at the time.**
 25 Q. But by looking what is behind these, sometimes just two

Page 135

1 letters, "VI" or WE" or "DR", you get to understand what
 2 the real conviction was, what the real intelligence was,
 3 what was really behind it, rather than just passing on
 4 a bald assertion, don't you?
 5 **A. If I had been asked the question: can you go back and**
 6 **find that information out? That is exactly what I would**
 7 **have done.**
 8 Q. Didn't you think it important, without being asked the
 9 question, to think, "Let's just look at what these are".
 10 If I know, whenever I have been to a firearms briefing,
 11 the first things they ask for are: what are the warning
 12 markers --
 13 **A. Mr Beer, I have tried to explain to you, probably on**
 14 **three occasions now --**
 15 Q. It might turn into four or five.
 16 **A. Okay. Because it is an affray, because of the year --**
 17 **was it 1997?**
 18 Q. Yes.
 19 **A. Okay, I have looked at it. Yes, I have noted it. Yes,**
 20 **I have passed it over. I have not deemed it -- had**
 21 **I looked into it, then perhaps I would have found the**
 22 **information out in relation to there being some video**
 23 **footage of it. But I didn't do, so I am not going to**
 24 **stand here now and tell you that is what I did.**
 25 Q. You see, what doesn't get passed on to the firearms team

Page 136

1 when they are briefed is Anthony Grainger, when he was
 2 21, wasn't convicted of an affray. He was convicted of
 3 dangerous driving.
 4 **A. Hmm.**
 5 Q. There is a marker on the system, but it is 15 years old
 6 now.
 7 **A. Yes.**
 8 Q. He has no other offences of violence on his record.
 9 **A. Yes.**
 10 Q. We have no other intelligence that he is violent. What
 11 they get told is:
 12 "Anthony Grainger has previously conspired to commit
 13 robberies with firearms and violence."
 14 How has that happened?
 15 **A. If you have a look at the profile of David Totton, if we**
 16 **could just look at that for a time, that is where that**
 17 **initial information has been grabbed from.**
 18 **Can I just do that and just talk you through?**
 19 Q. Of course, this is really your chance.
 20 **A. Yes, I know and that is why I want to really explain it**
 21 **to you.**
 22 **On 26 January, when the first tactical firearms**
 23 **briefing is conducted --**
 24 Q. So you want to look at -- are you talking about --
 25 **A. There are a couple of things we need to look at, because**

Page 137

1 **the briefing by the firearms team, on the 26th, that is**
 2 **the first time that those entries get put on that page.**
 3 **So those entries there are grabbed from -- some of**
 4 **the information is grabbed from the profile of**
 5 **David Totton, some of the information is grabbed by the**
 6 **officers working within the Tactical Firearms Unit.**
 7 Q. Are you going to say it just gets rehashed and rehashed?
 8 **A. I don't know what happens to it, I don't create that.**
 9 **You would have to speak to the officers who actually**
 10 **create the --**
 11 Q. I am winding forward quite a lot, but you were sitting
 12 there in this briefing, on the morning of 3 March, and
 13 you know there is a 15-year old affray, right at the
 14 bottom end of the calendar of criminal enterprises, and
 15 what the firearms officers get told is:
 16 "Anthony Grainger has previously conspired to commit
 17 robberies with firearms and violence."
 18 Do you not think, "Hold on, I don't know anything
 19 about that, that doesn't ring a bell at all"?
 20 **A. Mr Beer, I did try to explain to you, I am not there to**
 21 **check the actual PowerPoint presentation. So, at that**
 22 **time, when I am sat in that briefing, it should be**
 23 **noted -- if these records are the transcript -- I get**
 24 **asked, right at the start, if there is any intelligence,**
 25 **any information that I need to pass at that point.**

Page 138

1 **Once I have done that, and whether it shows it or**
 2 **doesn't show it -- and I don't know if I did leave on**
 3 **the 3rd, but there are occasions when I will leave the**
 4 **briefing to go and take phone calls, or -- and then**
 5 **I will go back into the briefing.**
 6 **That is not the reason why I am there.**
 7 **In relation to the conspiracy --**
 8 Q. Hold on, just dealing with that. That was read from the
 9 PowerPoint, that passage.
 10 **A. Yes.**
 11 Q. You didn't look at the PowerPoint, did you, before it
 12 was --
 13 **A. I don't get access to the PowerPoint. There have been**
 14 **occasions when I have been at the Tactical Firearms**
 15 **Unit, where I have been there and the staff have been**
 16 **doing the actual PowerPoint presentation.**
 17 **On this occasion, on the 3rd, it has probably been**
 18 **produced in the morning, so I may have been in while**
 19 **they were producing it but I wouldn't have certainly**
 20 **spent any time there.**
 21 **It is not my -- it is a tactical firearms -- what**
 22 **I might consider to be relevant, might not be relevant**
 23 **in terms of -- that a briefing in relation to the**
 24 **tactics -- the risk assessment has been conducted**
 25 **already by the tactical firearms commander, and then the**

Page 139

1 **strategic firearms commander has authorised -- that is**
 2 **down for the staff within that unit. It is about the**
 3 **tactics that are going to be deployed during the course**
 4 **of that. It is not my -- it is not my PowerPoint.**
 5 Q. It is not your job.
 6 I am going to deal, therefore, with this briefing in
 7 a little more briefing now, since we have turned to it.
 8 **A. Yes.**
 9 Q. What time did the briefing start; do you remember?
 10 **A. I would have to -- I think was it 5.00 am.**
 11 Q. If you look at tab 14, in your bundle.
 12 Can you see that -- sorry, you are a bit behind.
 13 **A. Yes.**
 14 Q. Your bundle, tab 14.
 15 **A. Sorry. Yes.**
 16 Q. Can you see, it says:
 17 "Good morning everybody. The time is now 5.57 am,
 18 on Saturday, 3 March."
 19 **A. Yes.**
 20 Q. Then there is a roll call, please. You are the third
 21 person to introduce themselves after X7; yes?
 22 It doesn't record you leaving, does it?
 23 **A. No, but it wouldn't do.**
 24 Q. Why wouldn't it? Wouldn't you say, "I am stepping out
 25 now"?

Page 140

1 **A. No.**
 2 Q. What is the purpose of saying that you are there?
 3 **A. Everybody is introduced at the start.**
 4 Q. What is the purpose of that?
 5 **A. The purpose of introducing yourself?**
 6 Q. Yes.
 7 **A. As to who is at that briefing.**
 8 Q. So if you leave, is there not a purpose to be served
 9 by --
 10 **A. No, it is not. I have left those briefings numerous**
 11 **times.**
 12 Q. And you don't say anything?
 13 **A. No.**
 14 Q. Do you think you left the briefing within the first
 15 three or four minutes?
 16 **A. No, I can't say if I did or if I didn't. The point**
 17 **being is -- sorry, the point being is that I would have**
 18 **an ear piece in with the radio, which I am obviously**
 19 **waiting to see if there is anything coming across from**
 20 **the surveillance teams. I would be waiting for**
 21 **an update on where the vehicles are -- in fact, just**
 22 **bear with me one second.**
 23 Q. You want to tell us that the vehicles were being
 24 deployed, the DSU, do you? So you were distracted, is
 25 that the purpose of this?

Page 141

1 **A. No, sorry, sir, I was just looking to see -- I've got**
 2 **an entry in my book which says, "TFU briefing", and then**
 3 **I've got an update from DS Hurst in relation to the**
 4 **download from the Audi.**
 5 Q. Yes, the VTD?
 6 **A. Yes, going to Culcheth, the night previous.**
 7 Q. Yes. And in any event, you were present and on the face
 8 of the record, you didn't leave, and you cannot
 9 positively say that you did; correct?
 10 **A. Well, can I just have a look to see when I am introduced**
 11 **if I give an update in relation to the vehicles being in**
 12 **Culcheth the night previous?**
 13 **(Pause)**
 14 Q. As far as I can see, you don't. I don't think you
 15 speak.
 16 **A. In which case, sir, it may be that I have actually**
 17 **stepped out because I have had a phone call off DS --**
 18 Q. What time is the phone call?
 19 **A. I've not -- it's not timed in my book. I've got, "TFU**
 20 **briefing ..."**
 21 **Sorry, if you want me to turn to -- we can look at**
 22 **it in my daybook and then you can see at the same time.**
 23 Q. The phone call is not recorded?
 24 **A. No, it has "TFU briefing" and then "update from**
 25 **DS Hurst", and:**

Page 142

1 **"From download Audi went to Culcheth last night.**
 2 **Visited a small petrol station and then returned to**
 3 **Boothtown."**
 4 Q. Okay, is that in file F? K/1248.
 5 **A. Yes.**
 6 Q. So, the entry for the 3rd, you are saying you made
 7 an entry:
 8 "Location of Audi: Sandringham Road. Audi is out of
 9 camera location but OP will still be in a position to
 10 pick up any movement should it come into camera."
 11 **A. Yes.**
 12 Q. Then:
 13 "TFU briefing."
 14 And then:
 15 "Update from DS Hurst. From download Audi went to
 16 Culcheth again last night. Visited a small petrol
 17 station and then returned to Boothtown."
 18 Is that right?
 19 **A. Yes.**
 20 Q. Were you saying that that entry causes you to believe
 21 that you left the briefing?
 22 **A. I can't remember, is the honest truth.**
 23 Q. It is fair to say, over the last five years you never
 24 said that you have stepped out of the briefing, have
 25 you?

Page 143

1 **A. I think I have on previous occasions, when I was asked**
 2 **I have explained that I have stepped out of the**
 3 **briefings.**
 4 Q. No, this briefing we are talking about.
 5 **A. I don't think I have ever been asked the question, sir.**
 6 Q. Okay. So, to the best of your recollection, can you
 7 positively say that you stepped out?
 8 **A. I can't say that I did and I can't say that I didn't.**
 9 **I may have done, because it would have been an update**
 10 **that I would have been expecting once the DSU staff were**
 11 **on duty and the download had been provided to my team.**
 12 Q. Are you saying this now because you want to distance
 13 yourself from the errors that we are about to look at?
 14 **A. Absolutely not, sir. Absolutely not.**
 15 Q. When did you first contact Superintendent Granby about
 16 this operation?
 17 **A. It was at --**
 18 Q. 7.05 the previous day?
 19 **A. Yes.**
 20 Q. So before this briefing. It is about what, 11 hours?
 21 **A. Yes.**
 22 Q. Yes?
 23 **A. Yes.**
 24 Q. So, the superintendent, the tactical firearms commander
 25 is first briefed about it at about 7.00 the night

Page 144

1 before, and then 11 hours later he is in this briefing,
 2 here?
 3 **A. Yes.**
 4 Q. You had, I think it follows, much more time than
 5 Mr Granby to get on top of the information relevant to
 6 the threat assessment in relation to the three subjects,
 7 didn't you?
 8 **A. Sorry, that had already been done that, the night**
 9 **before, sir.**
 10 Q. Are you talking about the cutting and pasting of
 11 Mike Lawler's threat assessment?
 12 **A. I have not cut and paste anything, have I, sir?**
 13 Q. I think it follows, that irrespective of what Mr Granby
 14 did, namely when he chose to cut and paste somebody
 15 else's briefing, you had more time to assess and analyse
 16 information relevant to the threat that these subjects
 17 posed than did Mr Granby, didn't you?
 18 **A. I didn't do any further assessment or analysis.**
 19 **I didn't receive any new intelligence, Mr Beer.**
 20 **I didn't have any new information that would cause me to**
 21 **make any kind of new assessment. I didn't need to.**
 22 **That was not what my role was in this investigation.**
 23 Q. Put it another way: you were aware of considerably more
 24 information that was relevant to the threat that these
 25 subjects posed than Mr Granby was, weren't you?

Page 145

1 **A. Yes, I had been working on the operation since October,**
 2 **so obviously I knew a lot more -- a hell of a lot more**
 3 **than Mr Granby would know.**
 4 Q. Given the significant or critical importance of accurate
 5 threat assessments being given to the AFOs, you would
 6 accept that if you saw or heard errors in the threat
 7 assessments passed to the AFOs, you should correct them?
 8 **A. If I would have picked up on that then -- in fact,**
 9 **I think I have given a statement somewhere where I make**
 10 **mention of that. If I would have seen it, if I would**
 11 **have picked up on it, then yes, I would.**
 12 Q. Or if you were not in a position to correct it, if you
 13 were suspicious that the information that the AFOs were
 14 being given might be wrong, you would have taken steps
 15 to have the information checked?
 16 **A. I would have raised it, yes.**
 17 Q. Can we look, please, at the briefing pack, which is file
 18 F/1267?
 19 We should start probably at F/1265, just to locate
 20 ourselves.
 21 So this is the briefing, the recorded briefing for
 22 3 March 2012.
 23 **A. Yes.**
 24 Q. At 1267, this is the PowerPoint presentation. In
 25 general terms, this is what you would expect to be read

Page 146

1 out at, for example, the briefing on 3 March.
 2 **A. Yes.**
 3 Q. Yes?
 4 The same for the information on the threat
 5 assessment for the subjects on 1268, 1269 and 1270.
 6 That is the information that gets read out.
 7 **A. Yes.**
 8 Q. When did you first see this briefing pack?
 9 **A. On the 3rd, it would have been.**
 10 Q. As it went up on a screen?
 11 **A. No, like I said, I had gone across to the Openshaw**
 12 **complex. I don't know if I got there about 5.30, 5.45,**
 13 **I can't remember what time it said the briefing started.**
 14 **I had gone across there, so I may have seen it, I may**
 15 **have not have seen it, but I wouldn't have looked**
 16 **through it. It wasn't my responsibility.**
 17 Q. It is not your responsibility --
 18 **A. The people who actually used to prepare it, there is**
 19 **a briefing room. So I know sometimes they used to**
 20 **prepare it in the room where the briefing was, other**
 21 **times they had a side room and they'd prepared it in**
 22 **there. So it depends where -- I would have got a brew,**
 23 **and then it would have depended where I was at that**
 24 **point, whether I would have sat and waited in the**
 25 **briefing room, and whether or not I would have sat in**

Page 147

1 **one of the parade rooms and waited for the briefing to**
 2 **start.**
 3 Q. So it depends on the vagaries of where you sit or where
 4 you take a drink as to whether or not you read the
 5 intelligence briefing given to firearms officers?
 6 **A. Yes, I wouldn't go through -- I would not sit and go**
 7 **through this briefing.**
 8 Q. Why?
 9 **A. Because it is not my briefing. It is a tactical**
 10 **firearms briefing, briefing staff that I have absolutely**
 11 **no skill in terms of their training and their expertise.**
 12 **So it is their briefing. It is not my briefing. I am**
 13 **there to present information, intelligence, that has**
 14 **occurred or that is current in relation to that**
 15 **deployment.**
 16 Q. Can you also confirm that this information that we have
 17 seen, on those four pages that I have set out, was
 18 contained in the 2 March briefing pack, the Mike Lawler
 19 one?
 20 **A. Yes.**
 21 Q. For your note, sir, that is C/585.
 22 Can you confirm that at that briefing, the 2 March
 23 briefing, you were also present?
 24 **A. I was.**
 25 Q. Can you confirm that this information was also read out

Page 148

1 at that briefing?
 2 **A. It would have been, yes.**
 3 Q. For your note, sir, that is F/1175.
 4 **A. Thank you.**
 5 Q. When did you first see the 2 March briefing pack?
 6 **A. At whatever it was, 1.00 in the morning, when the**
 7 **briefing took place.**
 8 Q. Again, did you see it in the room as it was being
 9 presented?
 10 **A. Yes, I would have been --**
 11 Q. Is that the first time you saw it?
 12 **A. Yes, I don't remember being -- I may have done. I may**
 13 **have -- somebody might have been working on it at**
 14 **a computer, but I wouldn't have taken an active part in**
 15 **whatever it is they were doing.**
 16 Q. These were your subjects, this was your operation and it
 17 had been going on for four and a half months?
 18 **A. But I am not the commander at that point. The commander**
 19 **of that operation is the tactical firearms commander, so**
 20 **he knows what he wants to go on, or she knows what they**
 21 **want to go on, that intel -- that briefing. It has**
 22 **nothing to do with me. They know the staff within the**
 23 **unit. I wouldn't know even the skills of the staff who**
 24 **can populate a PowerPoint within that unit, so it has**
 25 **absolutely nothing to do with me.**

Page 149

1 Q. Nothing to do with you.
 2 Just look, please, at volume 2 of the witness
 3 bundle, which is on your left-hand side, up -- that is
 4 it.
 5 **A. Yes.**
 6 Q. Take out volume 2, and open up the first tab.
 7 Can you see this is, I think, Mr Lawler's -- in fact
 8 it is the TA's policy log.
 9 Can you see, on the front page there, for
 10 1 March 2012, there is a list of roles, and it says:
 11 "Strategic firearms commander ACC Heywood for the
 12 planning phase."
 13 But nobody for the activation stage. The tactical
 14 firearms commander for the planning stage is Mr Lawler.
 15 The TA for the planning phase is Inspector Fitton, and
 16 then the intelligence officer for the planning phase is
 17 you.
 18 **A. That's correct.**
 19 Q. What does that mean, that you were the intelligence
 20 officer?
 21 **A. It is for that briefing, that Andy Fitton is at the**
 22 **briefing. So the planning phase there is when I am**
 23 **presenting this briefing to Mr Lawler and to**
 24 **Andy Fitton.**
 25 Q. Doesn't it mean that you are the intelligence officer

Page 150

1 for the firearms operation?
 2 **A. No.**
 3 Q. Why is it restricted just to the briefing? Why is it
 4 limited in that way?
 5 **A. Sorry, this document is what is prepared when I am**
 6 **briefing the TFC and the TAC. I think he was a TAC**
 7 **adviser. So I am presenting the intelligence to the TFC**
 8 **and to the TAC.**
 9 Q. In fact, this book, the tactical advisers, the TAC
 10 policy log, is about the whole of the operation. You
 11 can see that it contains, at page 2925, rather,
 12 an information/intelligence section.
 13 **A. Yes.**
 14 Q. Which goes over the page.
 15 **A. Yes.**
 16 Q. Then, at 2945, the tactical options that were
 17 considered --
 18 **A. Sorry, 2975?**
 19 Q. 2945.
 20 **A. Yes.**
 21 Q. Then, the contingencies, at 2951. So it is their record
 22 of their advice, their decision making, their tactical
 23 options throughout the operation.
 24 **A. No, it is not, sir. If I can just draw you back to**
 25 **2926 --**

Page 151

1 Q. 2926?
 2 **A. Yes.**
 3 Q. Yes?
 4 **A. That is specific to the information that I presented**
 5 **on -- when I first contacted and spoke to Mr Lawler on**
 6 **the 3rd. That is in relation to that. If you look,**
 7 **there is no reference in relation to all of the other --**
 8 **it is -- if you look at the log there --**
 9 Q. What I am saying is: this a booklet. It is about
 10 30 pages long. It is all form 375V and it goes between
 11 2917 to 2987.
 12 **A. Sorry, just one second.**
 13 **Yes, it does. If you actually look at the**
 14 **information intelligence, bear in mind --**
 15 Q. Sorry? Say it again.
 16 **A. If you look at the information intelligence, so if you**
 17 **look at page 2926, 2927, you have got one page and**
 18 **probably just short of half a page, and then you have**
 19 **got lots of blank pages, so that is because we were**
 20 **dealing with that intelligence.**
 21 **If it was dealing with the past four or five months,**
 22 **that would have all been detailed on that log.**
 23 Q. I think, or at least I hope, we are speaking at cross
 24 purposes. I am saying this a book completed by a TAC
 25 adviser. It is about 30 or 40 pages long, one part of

Page 152

<p>1 it is a record of your intelligence briefing; yes? Do 2 we agree on that? 3 A. Yes. 4 Q. You are shown, on the front cover, as being the 5 intelligence officer for the operation. 6 A. For that deployment, 75 of 12. 7 Q. Yes, exactly. What does the intelligence officer for 8 this deployment involve? 9 A. In briefing up the TAC adviser and the tactical firearms 10 commander. 11 Q. Does it involve any continuing responsibility for the 12 accuracy of the intelligence provided to the people with 13 guns? 14 A. No. 15 Q. Why? 16 A. Because that presentation -- the TAC adviser, or the 17 TFC, will elect somebody to prepare the briefing 18 document. Who they choose to do that is whoever they 19 have got available to them. They will then brief that 20 person in terms of -- it is not the person who prepares 21 the document that I would be -- that prepares the 22 electronic briefing that I brief up. I brief up the TAC 23 and the TFC, and then they brief up whoever it is who is 24 going to be preparing that document. 25 Q. Can we return, then, to the briefing, please, of</p> <p style="text-align: center;">Page 153</p>	<p>1 A. This was about capability, sir. I never, ever, 2 presented any information at all in that regard. 3 Q. Was any, to your knowledge, distinguishing done between 4 the subjects of the operation to say, "It is assessed 5 that A might be the driver, B is the leader and C we 6 don't know what he is doing"? 7 A. On that briefing? 8 Q. Yes. 9 A. I can't remember. If I could flick through -- 10 Q. Ie distinguishing between their relative positions? 11 A. I don't know if they did or they didn't, but if I could 12 read through it then -- 13 Q. Yes, go ahead. 14 (Pause) 15 A. No, there doesn't appear to be any reference to that, 16 sir. 17 Q. The next sentence: 18 "There is intelligence to suggest --" 19 We are on 333. 20 A. Yes. 21 Q. "There is intelligence to suggest that these subjects 22 were responsible for a robbery in 2008, in Preston, 23 where they broke into a bank and lay in wait for staff 24 to arrive. On their arrival, they were held at gunpoint 25 using shotgun, handgun, tied up and forced to hand over</p> <p style="text-align: center;">Page 155</p>
<p>1 3 March 2012. You can put that volume 2 away, please. 2 It is volume 1 of your witness file, at page 332, 3 tab 14. 4 A. Sorry, 232? 5 Q. No, 332, tab 14. We're back in the briefing. 6 A. I am there. 7 Q. At 333, Mr Granby says: 8 "Okay folks, the information we have got at the 9 moment is that the subjects -- who we will see in 10 a moment -- of this operation are believed to be engaged 11 in armed robberies in the north-west region." 12 A. Yes. 13 Q. Did you think that was accurate? 14 A. Yes. 15 Q. Why? 16 A. From the surveillance operation that I had been 17 conducting and together with intelligence that was being 18 received. 19 Q. Did you understand that to mean that it had been 20 assessed that the subjects of the operation, who 21 Mr Granby was about to turn to, would each be armed? 22 A. Did I think they would all be armed? 23 Q. Yes. 24 A. I have never presented that information at all, sir. 25 Q. So you didn't think that they would each be armed?</p> <p style="text-align: center;">Page 154</p>	<p>1 keys to the strong room. Subjects made good their 2 escape with a substantial amount of money." 3 A. Yes. 4 Q. Would you agree that the AFOs were led to believe that 5 Anthony Grainger, along with the two other subjects, 6 Mr Totton and Mr Rimmer, were responsible for the 2008 7 robbery in which a handgun and/or shotgun was used? 8 A. It certainly says, "Subjects", sir. 9 Q. Are you aware there was no evidence that 10 Anthony Grainger was involved in that offence at all? 11 A. I am aware there was no evidence or intelligence in 12 relation to Anthony, or in relation to Robert Rimmer. 13 I am aware that the intelligence related to 14 David Totton, and that is the information that was 15 presented by me to the tactical firearms commander and 16 Mr Lawler. On the 1st, and I think it is mentioned 17 within his notes, the tactical firearms commander's log, 18 where he makes specific reference -- 19 Q. We are going to come in a moment to how the error has 20 arisen, but would you agree this a serious error, to the 21 extent that it suggests to AFOs that Anthony Grainger 22 and Robert Rimmer participated in a robbery when 23 a shotgun and/or handgun were used? 24 A. I would agree it was an error, yes. 25 Q. It is a very serious error.</p> <p style="text-align: center;">Page 156</p>

1 **A. It is an error, yes, of course.**
 2 Q. Do you agree -- is it a minor error?
 3 **A. It is an error.**
 4 Q. Is it a serious error?
 5 **A. I am saying it is an error, sir.**
 6 Q. I am asking you a question. I don't want to fence for
 7 too long.
 8 **A. Yes.**
 9 Q. Is it serious error?
 10 **A. It is an error because it says, "Subjects", instead of,**
 11 **"One of these subjects".**
 12 Q. Would you agree that's an error, telling firearms
 13 officers that all three of your subjects had been
 14 involved in a robbery, three years previously, when
 15 a shout gun or a handgun were used? Come on, that is
 16 a serious error, isn't it?
 17 **A. It is definitely an error, yes.**
 18 Q. I will not waste time.
 19 You ought to have taken steps to correct that,
 20 shouldn't you?
 21 **A. If I would have heard it, sir.**
 22 Q. Didn't you hear it?
 23 **A. I don't know if I did or if I didn't, sir.**
 24 Q. Can you see how what I am calling a serious error and
 25 you are calling an error --

Page 157

1 **A. No, it's --**
 2 Q. -- arose?
 3 **A. Sir, I understand the route that you are taking. What**
 4 **I am trying to explain to you is:**
 5 **(a) I don't know if I was in the room or I was not**
 6 **in the room;**
 7 **(b) If I was in the room, whether I was actually**
 8 **concentrating on what the briefing was.**
 9 **At this point, my function, as I have explained to**
 10 **you, is in relation to -- at this point the risk area**
 11 **that we had was a stolen vehicle and whether that should**
 12 **be moving very early in the morning, as it had done on**
 13 **a previous occasion.**
 14 Q. Can we look to see how the error arose?
 15 **A. Yes.**
 16 Q. Can we look at file C, page 369, please. This is part,
 17 I think, of Mr Lawler's tactical firearms commander's
 18 policy file and decision log, and can you see, at 369,
 19 for the 1 March 2012?
 20 **A. Yes.**
 21 Q. He says:
 22 "A full break down of the three subjects of Op Shire
 23 was provided by the SIO, DI Cousen."
 24 Then he lists three of them, Mr Totton, Mr Rimmer
 25 and Mr Grainger.

Page 158

1 **A. Yes.**
 2 Q. "Key information supported by the attached intelligence
 3 reports."
 4 And then, (a):
 5 "One or more subjects involved in armed robbery in
 6 Kirkham, in 2008, where FI, firearm and staff
 7 threatened, cash stolen."
 8 Can you see that?
 9 **A. I can, yes.**
 10 Q. Is that what you told Mr Lawler, that one or more of the
 11 subjects were involved?
 12 **A. No, what I told him is that we had intelligence in**
 13 **relation to David Totton and that there was also**
 14 **intelligence in relation to another gentleman, but there**
 15 **had actually been, I think, four people on the job, but**
 16 **they had never been arrested in that regard.**
 17 Q. Can you think why Mr Lawler would write it down, that
 18 one or more of the subjects, ie Mr Totton, Mr Rimmer and
 19 Mr Grainger, were involved if that is why you didn't
 20 tell him -- if that not what you told him?
 21 **A. I took the email with me that Gary Mills had actually**
 22 **printed out and read off it, and if you could just --**
 23 **just to confirm that, if we could just go back to the**
 24 **TFC log for Andy Fitton, because he actually makes**
 25 **specific reference and I read out the actual**

Page 159

1 **intelligence, if I could just do that.**
 2 Q. Absolutely. Again, this is your chance to say
 3 everything that you want.
 4 **A. Yes. So if you just want to point me in the right**
 5 **direction.**
 6 Q. I don't know what document you are talking about.
 7 **A. It is the one for Andy Fitton, the one you were just**
 8 **making reference to.**
 9 Q. I think that was F. I can't remember the page number.
 10 I can't find it now.
 11 (Pause)
 12 I think it might be the one that is actually in your
 13 witness bundle. File 2, page 2? File 2, the second
 14 page in.
 15 **A. If you read through the log there, from Andy Fitton,**
 16 **because obviously he was at the briefing --**
 17 Q. So that everyone understands what we are doing: we are
 18 looking at what two men have written down whilst they
 19 are listening to you. In our left hand, we are going to
 20 have what Mr Fitton has written for a briefing at 12.30,
 21 on the 1st, page 2925. In our right hand, we are going
 22 to have what Mr Lawler has written down, page 369; yes?
 23 **A. Yes.**
 24 **So I have read out the email that I had -- we**
 25 **probably need the email as well, but the email that**

Page 160

1 I had been sent by Gary Mills. And if you look at what
 2 has been taken down by inspector Fitton, it makes clear
 3 reference -- I can't answer the question why it says
 4 2008 instead of 2005, because the offence
 5 was August 2005.
 6 Q. They have both put 2008 down.
 7 A. So whether that is my error or whether it is theirs,
 8 given that they both put 2008, I would suggest it
 9 probably looks more like it is more my error than it
 10 does theirs. But then it says -- is that "robbery"?
 11 Q. It is either robber or history?
 12 A. " ... in 2008 where ..."
 13 Q. "[Something] approx 3.25 has broken into a financial
 14 premises..."
 15 A. Yes:
 16 "Where subject, approximately 3.25, has broken into
 17 a financial premises, then laid down and waited for
 18 staff to arrive. They have then demanded keys, tied up
 19 the staff in the belief that this MO may be used again.
 20 Used hacksaw in incident."
 21 So there is specific information there, which
 22 supports the fact that I have read out exactly what
 23 I have had.
 24 Q. But what you are doing, you are saying that because
 25 Mr Fitton has not written down that you said that it was

Page 161

1 these subjects that were involved, or one or more of
 2 these subjects were involved, we are to prefer his
 3 account over Mr Lawler?
 4 A. No, what it is saying -- no, where -- well, Mr Lawler
 5 has not written down, has he?
 6 Q. Sorry?
 7 A. Mr Lawler has not written down this information.
 8 The whole reason why I went to the tactical firearms
 9 for a briefing was in relation to this, because we had
 10 had the sighting of the hacksaw, so that is the whole
 11 reason why we was there on that particular day. So the
 12 relevance being is, obviously, inspector Fitton has
 13 written down ...
 14 Yes, I don't know what the line says there, but
 15 there is a robbery in 2008:
 16 "Where subject, approximately 3.25 hours, has broken
 17 into a financial premises."
 18 Q. In fact, it doesn't say "subject", does it? It says
 19 "object"?
 20 A. "Object".
 21 Q. Or "ubject"?
 22 A. "Where object approximately ..."
 23 No, it is "subject", as in individual, not plural.
 24 Q. So you are saying that that is what you said, not what
 25 Mr Lawler has written down?

Page 162

1 A. No, I have said, in relation to the robbery, I have read
 2 out from the actual email. Bearing in mind, I was not
 3 aware of it. That morning I had gone in work at
 4 whatever time it was, 6.45, staff are sat down,
 5 Andrew Talbot had been to the debrief the night before
 6 and mentioned the sighting of this hacksaw.
 7 At 7.15, Gary Mills says, "This what I have found in
 8 relation to hacksaw, previous offence. We have had the
 9 people around financial institutions in Culcheth". And
 10 that is where the relevance comes. That is why that
 11 particular briefing took place on that particular day.
 12 So, the point being is there was a mention of one of
 13 the subjects, that being David Totton, if I would have
 14 had intelligence on any of the other subjects, I would
 15 have presented it there and then, but I didn't.
 16 Q. So, it was just about Mr Totton, no mention of anyone
 17 else?
 18 A. No. Well, there was unknowns, wasn't there?
 19 Q. But not these two subjects, not Mr Grainger and Mr --
 20 A. No, on the job there was four people. So the
 21 intelligence said Totton, it said another person, so
 22 there would have been at least two unknowns. We didn't
 23 know who they was, but I have not inferred that this was
 24 Anthony or Robert Rimmer because I didn't have that
 25 intelligence.

Page 163

1 Q. If we go forward to tab 16 in your second volume,
 2 please.
 3 THE CHAIRMAN: Tab 16, it is in the first volume.
 4 MR BEER: You are quite right, sir. Tab 16, first volume.
 5 A. Yes.
 6 Q. Look at page 449, please.
 7 A. Yes.
 8 Q. This is the passage that Mr Lawler read out in his
 9 2 March briefing.
 10 A. Yes.
 11 Q. You see the second paragraph:
 12 "There is intelligence to suggest that these
 13 subjects were responsible for a robbery in 2008, in
 14 Preston ..."
 15 A. Yes.
 16 Q. "... where they broke into a bank and lay in wait for
 17 the staff to arrive. On their arrival they were held at
 18 gunpoint, shotgun and handgun. Tied up and forced to
 19 hand over keys to the strong room. Subjects made good
 20 their escape with a substantial amount of money."
 21 You didn't give Mr Lawler that information, did you?
 22 A. No.
 23 Q. So you knew that that information there was wrong,
 24 didn't you? This information that is here?
 25 A. Yes, I do.

Page 164

1 Q. When he read that out, you would know that was wrong.
 2 **A. Yes. If --**
 3 Q. Did you do anything to correct him, Mr Lawler?
 4 **A. Sir, if I would have heard it, then I would have raised**
 5 **it.**
 6 Q. That is twice then. So it is the briefing on the 2nd
 7 and the briefing on the 3rd, where the same misleading
 8 information was read out and you have not heard it?
 9 **A. To be honest, sir, I have done these firearms briefings**
 10 **dozens and dozens of times.**
 11 Q. You mean they all wash into each other?
 12 **A. No, absolutely not. The point being is when I am sat in**
 13 **the briefing, I am not sat there looking at what is**
 14 **going on on the briefing. I've got lots of other things**
 15 **going on. I've got staff being deployed in observation**
 16 **posts, staff back at the office who are doing inquiries**
 17 **for me that need to report back to me for various**
 18 **things. I am not there to go and check the accuracy of**
 19 **what this briefing is but, suffice to say, had I seen**
 20 **that, then absolutely I would have raised it.**
 21 Q. Had you seen it twice, you would have raised it on each
 22 occasion?
 23 **A. I was on the briefing -- I was on the briefing -- well,**
 24 **if I would have raised it the first time, it would not**
 25 **have gone on the briefing on the second occasion, would**

Page 165

1 **it?**
 2 Q. I don't know.
 3 What did you brief Superintendent Granby, at about
 4 7.00 or 7.05, on the 2nd, about the Preston/Kirkham
 5 robbery?
 6 **A. I didn't brief Superintendent Granby. I told him we**
 7 **had had a deployment the night previous, the firearms**
 8 **authority had been rescinded in relation to that**
 9 **authority. This was a completely different deployment.**
 10 **The intelligence dictated a completely different**
 11 **deployment. This was a daytime deployment, not**
 12 **an overnight deployment. So he was aware that we had**
 13 **had the deployment the night previous, but this was**
 14 **a deployment for a different reason.**
 15 Q. We know that Mr Granby, like Mr Lawler, read out the
 16 same misleading information; yes?
 17 **A. The briefing looks exactly the same.**
 18 Q. Did you know that he was going to recycle somebody
 19 else's briefing?
 20 **A. No. Was it the same person that actually produced the**
 21 **briefing?**
 22 Q. We have yet to investigate that, but I think it was.
 23 **A. Right.**
 24 Q. I am not sure whether the second briefing was actually
 25 produced rather than copied.

Page 166

1 **A. Okay.**
 2 Q. Going back to tab 14, of bundle 1, and transcript at
 3 page 333.
 4 **A. Yes.**
 5 Q. You say that you either weren't present or if you were
 6 not present, didn't focus on these errors; is that
 7 right?
 8 **A. I didn't. When I am in those briefings, and I am sure**
 9 **when other SIOs go in their briefings -- we have taken**
 10 **it to the point of we have either got a firearms**
 11 **authority or we've not.**
 12 **If we get a firearms authority, then that is the**
 13 **procedure that takes place. If we don't get a firearms**
 14 **authority, we then go and look at different measures.**
 15 **Our job at that point is that the threshold has been**
 16 **passed, the intelligence has been passed and assessed.**
 17 **It is not my role to be in there, to be checking what is**
 18 **on the screen.**
 19 Q. That might sound, that answer, that once you have
 20 crossed the threshold of getting the firearms deployment
 21 in place --
 22 **A. Yes?**
 23 Q. -- you wash your hands of --
 24 **A. No, not at all.**
 25 Q. -- responsibility for the accuracy of intelligence?

Page 167

1 **A. No.**
 2 Q. That all originates from you?
 3 **A. No, because there is a continuing process of me passing**
 4 **information to whoever that tactical firearms commander**
 5 **is, right to the point when we go to the arrest phase.**
 6 **So whatever intelligence comes in, whatever source that**
 7 **comes from, that is a continuing -- there is**
 8 **a continuing onus on me to do that, so absolutely not.**
 9 **The point I am trying to get across is that I have**
 10 **not picked up, when I have been on the briefing, of what**
 11 **has been written on the actual briefing.**
 12 Q. What has been written on a briefing twice and what has
 13 been read out twice?
 14 **A. It has been written on twice and read out twice.**
 15 **Perhaps if it would have been sent to me beforehand --**
 16 **which has never happened before and I don't think it is**
 17 **kind of standard policy -- then I would have seen it and**
 18 **informed to say, "No, this is not quite correct, can you**
 19 **just change these words to 'One of these subjects'".**
 20 Q. Can we move on in the briefing, please, and look at 335,
 21 at the top of the page. So we are in tab 14, still,
 22 335.
 23 **A. Yes.**
 24 Q. I think X7 is saying:
 25 "Subject number 3 is Anthony Grainger."

Page 168

1 **A. Yes.**
 2 Q. "A white male, 35-year old, 6 feet tall, medium build.
 3 His capability: he has warnings for weapons."
 4 **A. Yes.**
 5 Q. That was not on the profile that you had passed, was it?
 6 **A. No.**
 7 Q. Was it right, therefore, to tell SFOs that Mr Grainger
 8 had warnings for weapons?
 9 **A. That is the point I was trying to refer to earlier, in**
 10 **terms of the -- what has been said there, the weapons,**
 11 **and then the reference down here to this, "Numerous**
 12 **arrests for section 18 and 20 offences", it would appear**
 13 **that is research that has been conducted by the TFC**
 14 **staff.**
 15 Q. So that was not something that you knew about, that he
 16 had warnings for weapons?
 17 **A. It is not something that I have briefed on. I may have**
 18 **known it, if I have looked on the profile, but if**
 19 **I would have done, then I am sure I would have told**
 20 **Mr Granby.**
 21 Q. So the subject matter experts, the FIB, have produced
 22 a profile which did not say, "Warnings for weapons"?
 23 **A. Yes.**
 24 Q. You had provided that to a TFC the night before --
 25 **A. Yes.**

Page 169

1 Q. -- by email, or the day before by email.
 2 **A. Yes.**
 3 Q. It had been copied across --
 4 **A. Yes.**
 5 Q. -- it seems, and then somebody has gone off and found
 6 a warning for weapons outside of the subject profile
 7 that was provided to the Firearms Unit?
 8 **A. I think if you go back to -- you would need to look at**
 9 **the briefing for 26 January, and just see what is on**
 10 **there first, because then that might allow us to see**
 11 **exactly when that has or has not been put on there.**
 12 Q. So it might be a recycling of a month and a half?
 13 **A. It may be, I don't know. It may be, I don't know.**
 14 Q. We will try and find, as you raise it, the briefing of
 15 26 January. I think it is tab 34, volume 3. The
 16 briefing of 26 January was not tape recorded, so we
 17 haven't a transcript of it. So this is the equivalent
 18 PowerPoint for the 26th.
 19 **A. Yes.**
 20 Q. Are you referring to page 329?
 21 **A. Yes. So, at this point, I haven't briefed in relation**
 22 **to Anthony Grainger.**
 23 Q. No.
 24 **A. So whoever has populated that document has grabbed that**
 25 **information from somewhere, which I would suggest is**

Page 170

1 **going to be either OPUS or PNC, or --**
 2 Q. We know it is not the PNC because that hadn't a warning
 3 marker for weapons on it.
 4 **A. No, so they have got it from OPUS then.**
 5 Q. Did you know they were doing this, that they were
 6 recycling an old briefing, rather than using the
 7 intelligence that you were giving them?
 8 **A. No. No, it is not my -- it is not my --**
 9 Q. It is not your responsibility?
 10 **A. It is not my team. It is not my staff.**
 11 Q. But it is your operation, you have been involved in it
 12 for four and a half months now.
 13 **A. Yes, so I think the kind of -- I have team of staff who**
 14 **I have responsibility for. I know what their roles and**
 15 **what their responsibilities are, and if we have a new**
 16 **member of a team, we will look at what training they**
 17 **have had. We have a skills matrix, in terms of who can**
 18 **do what, and that is up to date.**
 19 **I wouldn't know, within the Firearms Unit,**
 20 **I wouldn't know if they had somebody in an admin**
 21 **department who would do that kind of function. What**
 22 **I can say to you is, from going to a number of firearms**
 23 **briefings, that you have firearms officers who I have**
 24 **seen preparing these briefing, electronic briefings.**
 25 **I think the other thing is, when I have briefed up**

Page 171

1 **the TFC, and then the TFC has briefed up the TAC, or**
 2 **whoever it is that is going to be responsible for**
 3 **preparing the briefing, they may have picked up on**
 4 **something which is relevant to whatever the tactics they**
 5 **are going to use, which has absolutely no relevance to**
 6 **me. Obviously, I don't know what they discuss and what**
 7 **they don't discuss.**
 8 Q. Would you agree that OPUS warnings cover a very broad
 9 spectrum of suspicion?
 10 **A. Sir, yes, you have asked me this question previously.**
 11 **It's intelligence.**
 12 Q. I think I asked about PNC and not about OPUS in
 13 particular. But weapons warnings could relate to --
 14 I don't know -- an arrest for possession of an offensive
 15 weapon where no further action was taken against
 16 the subject when they were a juvenile, at one end of the
 17 spectrum; and a recent conviction for murder.
 18 **A. It is right what you are saying. OPUS can obviously**
 19 **have a wider spectrum than what the PNC can.**
 20 Q. Would you agree that in order for an officer to be able
 21 to understand the threat that a person poses, they need
 22 to know where in that spectrum of suspicion and
 23 behaviour the weapons warning sits?
 24 **A. This might be why they have added the weapon warning on**
 25 **there, because I have -- on that particular occasion,**

Page 172

1 **I hadn't briefed on Anthony; okay? So they have clearly**
2 **looked at the profile, I would suggest, of David Totton**
3 **and then for whatever reason they need to do tactically,**
4 **operationally, whatever reason it is, to produce this**
5 **document -- if I am -- if I have an operation where it**
6 **is an unarmed operation, then it is one of my members of**
7 **staff that produces this type of electronic briefing;**
8 **okay? And I would know that inside out because it is**
9 **relevant, because it is unarmed and I would be -- the**
10 **tactics deployed are completely different in terms of**
11 **whether it is a rapid entry or whatever it may be, so**
12 **I would know wholly what that is.**

13 **You are talking about a specialist unit here. So**
14 **what they need, what they require, isn't something that**
15 **I can dictate to, in terms of: this is what you put on,**
16 **this is what you don't. This their briefing, this**
17 **specialist highly trained unit.**

18 Q. You wouldn't agree with me, as a matter of common sense,
19 that to tell somebody who -- a group of 16 men, each of
20 whom is carrying at least three firearms, "This man has
21 a warning for weapons", you need really to give a bit
22 more information to say whether it is a 30-year old
23 juvenile, NFA, where it turned out to be huge mistake,
24 or a recent conviction for possession of a machine gun,
25 or for murder?

Page 173

1 **A. Mr Beer, I don't think for one minute that a 30-year old**
2 **item would be on there.**

3 Q. What is the warning --

4 **A. Whoever has prepared this document, you are going to**
5 **have to ask them the question, because it is them that**
6 **has put this on there. So you are going to have to ask**
7 **them the question in relation to the warnings marker.**

8 Q. The warnings marker for weapons, you don't know what
9 that refers to?

10 **A. No.**

11 Q. We have been through the PNC already, and I think we
12 have been through OPUS already --

13 **A. Yes.**

14 Q. -- and haven't been able to find anything -- we did
15 that before lunch -- that relate to weapons.

16 **A. Yes.**

17 Q. You don't know what it refers to?

18 **A. No.**

19 Q. Moving back to our briefing, at volume 1, tab 14, X7
20 continues at the top of page 335. So tab 14, page 335.

21 **A. Yes.**

22 Q. He has previously conspired, this is Mr Grainger.

23 **A. Yes.**

24 Q. To commit robberies with firearms and violence.

25 **A. Yes.**

Page 174

1 Q. Had Mr Grainger previously conspired to commit robberies
2 with firearms and violence?

3 **A. He had certainly be arrested for that, yes.**

4 Q. But had he actually done it?

5 **A. No, but he had been arrested for it.**

6 Q. But had he actually conspired?

7 **A. Well, he was not found guilty of it.**

8 Q. Is that what this suggests; he has previously conspired
9 to commit robberies with firearms and violence?

10 **A. Well, that is the way that you are reading it, sir, but**
11 **it is not the way I am reading it. Don't forget, this**
12 **is an intel briefing.**

13 Q. It is a pretty important one, isn't it?

14 **A. Of course it is an important one.**

15 Q. Where was the suspicion that he had previously conspired
16 to use firearms in any offending?

17 **A. The previous crime, the one that Rachel Griffiths**
18 **referred to --**

19 Q. The Operation Vulture in 1985, the one we are going to
20 come back to tomorrow?

21 **A. Yes, that was a conspiracy over a period of time, wasn't**
22 **it?**

23 Q. Alleging against Mr Grainger that he had used firearms,
24 was it?

25 **A. I don't know if it was Mr Grainger or it was the**

Page 175

1 **organised crime group, or --**

2 Q. This says:

3 "He has conspired to commit robberies with
4 firearms."

5 I am asking you: are you aware of anything, even
6 unsubstantiated suspicions --

7 **A. There is regardless of if it is a conviction or not**
8 **a conviction --**

9 Q. The firearms --

10 **A. Well, for a firearms cadre, they would ask for that**
11 **information. How it is then verbalised or typed on, on**
12 **the electronic briefing:**

13 **"He has previously conspired to commit robberies."**
14 **It doesn't say:**

15 **"He has previously been convicted of conspiracy to**
16 **commit robbery."**

17 Q. It says he has actually done it, doesn't it?

18 **A. No, it says he has previously conspired to commit**
19 **robberies. It doesn't say he is convicted.**

20 Q. What it doesn't say -- which I am going to suggest it
21 should say -- is, "There is intelligence to suggest
22 that" or "It has been assessed that", or some watered
23 down or accurate, if there is any, even unsubstantiated
24 suspicion that Mr Grainger had conspired to commit
25 robberies with firearms. Because what we are going to

Page 176

1 do is, we are going to hear in probably three or four
 2 weeks time, Q9, Mr Davies's client come along and say,
 3 "I was told that this man had committed robberies in the
 4 past with firearms, and I took that at face value."
 5 He would be wrong to do that, wouldn't he?
 6 **A. Well, what I am trying to explain to you here is, when**
 7 **that briefing has been given, however it is worded, it**
 8 **doesn't say he has previously been convicted.**
 9 Q. No, it is worse than that, isn't it? It says he has
 10 actually done it.
 11 **A. No. However it gets worded on the briefing, well, as**
 12 **I have said to you previously --**
 13 Q. Somebody else's job?
 14 **A. No, it is not me presenting the briefing, is it?**
 15 Q. Would you agree that the combination of the warning for
 16 weapons that the firearms officers were told about, and
 17 the statement that Mr Grainger had conspired to commit
 18 robberies with firearms, would give an SFO the strong
 19 impression that this is a man who conspires to use
 20 firearms to commit robberies?
 21 **A. I wouldn't agree -- I have never done that job, have I?**
 22 **So I wouldn't agree, I don't know what conversations**
 23 **take place amongst the teams in relation to -- I don't**
 24 **know.**
 25 **At the end of the day, they have sat in a briefing,**

Page 177

1 **haven't they, and they have been presented that**
 2 **information. I can't make an assessment on what any**
 3 **other person thinks at that particular time.**
 4 Q. So you think this is justified:
 5 "He has previously conspired to commit robberies
 6 with firearms and violence."
 7 On the basis of Rachel Griffiths' entry in the
 8 subject profile for Mr Grainger?
 9 **A. It is -- that is the information that I had been**
 10 **presented, yes.**
 11 Q. Was it more than one robbery you had been presented
 12 with?
 13 **A. Well, I have looked at the one that was mentioned.**
 14 Q. Do you know why this is plural, that he had conspired to
 15 commit more than one robbery?
 16 **A. I don't. Again, I don't know. I don't know.**
 17 Q. On the basis of the information that you possess, that
 18 is an error, isn't it?
 19 **A. "Conspired to commit robberies"?**
 20 Q. Yes, with firearms and violence.
 21 **A. On the basis of the information that I have --**
 22 Q. No, that you had.
 23 **A. Yes, that I had. In terms of reading that crime, it is**
 24 **suggested that the five or six people had been arrested**
 25 **for a number of offences, and I am not saying in**

Page 178

1 **relation to Anthony. I certainly didn't present, in**
 2 **terms of other offences. I didn't turn up with a list**
 3 **of different crime numbers in relation to any offences.**
 4 Q. Would you agree that this is misleading because it
 5 presents an unproven allegation as established fact?
 6 **A. I would agree that it, that with the benefit of**
 7 **hindsight, that it could have been worded differently.**
 8 Q. Would you agree that it presents an unproven allegation
 9 as an established fact?
 10 **A. No, I wouldn't.**
 11 Q. Why not?
 12 **A. Because it doesn't say that he was convicted.**
 13 Q. You don't think saying, "He has previously conspired
 14 to ..."?
 15 **A. No, whether that be police jargon, whether it be the way**
 16 **we speak and it is not as articulate as perhaps other**
 17 **ways, I don't know. But I would not say, on looking at**
 18 **that, that that seems to me that this is somebody who**
 19 **has immediately been convicted of robbery offences.**
 20 Q. The briefing continued:
 21 "He has numerous arrests for section 18 and 20
 22 offences."
 23 **A. Yes.**
 24 Q. In fact, as far as I can see, the only section 20 arrest
 25 was for the driving incident, in 1997, which were not

Page 179

1 proceeded with.
 2 **A. When you took me to the page previously, at the bottom**
 3 **of the crime reports, where it was the offences which**
 4 **I explained, I think has been dragged across from**
 5 **GMPics, I suspect that is where whoever it is who has**
 6 **prepared -- and I am going right back now, because this**
 7 **is mentioned on 26 January -- I suspect that is where**
 8 **they have grabbed that information from. Because,**
 9 **actually, when you look at that, it does mention more**
 10 **offences of violence.**
 11 Q. Let's go back and look at that. So you are talking
 12 about the OPUS record, are you, for Mr Grainger?
 13 **A. Yes.**
 14 Q. It may take me a while to find it, hold on.
 15 (Pause)
 16 Just wait one moment, if you would.
 17 **A. Yes.**
 18 (Pause)
 19 Q. C/704, please.
 20 THE CHAIRMAN: Can I have that page reference again, please,
 21 Mr Beer?
 22 MR BEER: C/704.
 23 THE CHAIRMAN: C/704.
 24 **A. Yes.**
 25 MR BEER: I think you are talking about 727.

Page 180

<p>1 A. Yes.</p> <p>2 Q. Is that right?</p> <p>3 A. No, it is -- sorry.</p> <p>4 (Pause)</p> <p>5 It might be in the next bundle.</p> <p>6 Q. It might be 737 you are talking about.</p> <p>7 A. Yes.</p> <p>8 Q. Is it 737?</p> <p>9 A. Yes.</p> <p>10 Q. So what X7 read out was that Mr Grainger had numerous</p> <p>11 arrests for section 18 and 20 offences.</p> <p>12 A. Yes, so these have been put on, on 26 January, the first</p> <p>13 time. That is the first time that has featured.</p> <p>14 Q. I am just looking for the numerous section 18 and 20?</p> <p>15 A. If you have a look, you have got a wounding there, the</p> <p>16 top one, and then if you move down, "Serious assault".</p> <p>17 Q. Yes.</p> <p>18 A. And then --</p> <p>19 Q. Then I think we run out.</p> <p>20 A. Yes.</p> <p>21 Q. I am just looking for the numerous arrests.</p> <p>22 A. I am just going through the next page.</p> <p>23 Yes, well, that's the only ones I can see.</p> <p>24 Obviously, you've got the murder in there, which is</p> <p>25 incorrect, as you have quite rightly pointed out.</p> <p style="text-align: center;">Page 181</p>	<p>1 remember we looked at that earlier when --</p> <p>2 A. Yes, we did.</p> <p>3 Q. -- it was not proceeded with?</p> <p>4 A. Yes.</p> <p>5 I mean I can't answer the question, can I, for</p> <p>6 whoever it is that has put it on there, but the point</p> <p>7 being is they have grabbed the information from here.</p> <p>8 So if you look at it in terms of the first page for the</p> <p>9 crimes, you have the two section 20s and then --</p> <p>10 Q. Which are the same thing -- you cannot say page 1, which</p> <p>11 is repeated on page 3. There are numerous because,</p> <p>12 I have seen it twice.</p> <p>13 A. Actually, some of these are different, which you pointed</p> <p>14 out previously. The point being is I don't know what</p> <p>15 research has been conducted in relation to those</p> <p>16 offences.</p> <p>17 Q. No. You would expect some research, wouldn't you?</p> <p>18 A. Whoever has put that on the briefing has got to have got</p> <p>19 it from somewhere. They have got to have looked,</p> <p>20 haven't they, on the system?</p> <p>21 Q. Yes, and you would expect some research to be done,</p> <p>22 wouldn't you?</p> <p>23 A. Well, no, they may have looked, looked at whatever the</p> <p>24 arrests are, and that is a couple of sentences, or one</p> <p>25 sentence, to say there has been numerous arrests.</p> <p style="text-align: center;">Page 183</p>
<p>1 Q. So it looks like this is wrong, as well, that there have</p> <p>2 been numerous arrests for section 18 and 20 offences as</p> <p>3 well, doesn't it?</p> <p>4 A. Yes, but the point I am making is that information has</p> <p>5 been grabbed from -- at a point from where -- I have not</p> <p>6 presented that.</p> <p>7 Q. I am not trying to attribute responsibility to you but</p> <p>8 it looks like that is wrong too, doesn't it?</p> <p>9 A. Yes. If it would have said "There has been several ..."</p> <p>10 Q. Well, yes, I mean the serious assault is</p> <p>11 9 December 1997. That is, I think, the arrest for the</p> <p>12 two section 20s arising from the incident on</p> <p>13 4 December 1997.</p> <p>14 A. Yes. This is the point I was trying to raise though.</p> <p>15 In terms of GMPics, that potentially captured the</p> <p>16 information when somebody has been arrested and that has</p> <p>17 been put on the GMPics system, so in terms of whoever it</p> <p>18 is -- it actually says "arrested", doesn't it? They</p> <p>19 have taken it on face value as to what it says and ...</p> <p>20 Q. So it looks like that 9 December may be the two arrests</p> <p>21 for the section 20 offences, which were then reduced to</p> <p>22 an affray and then were not proceeded with, and ended up</p> <p>23 in a dangerous driving, yes?</p> <p>24 A. Yes.</p> <p>25 Q. Then the wounding with intent on 7 January 2002, do you</p> <p style="text-align: center;">Page 182</p>	<p>1 You asked me the question, is that correct --</p> <p>2 I would have said it may have been better if it said</p> <p>3 "There has been several arrests".</p> <p>4 Q. The accurate position would have been there has been</p> <p>5 an arrest for a section 18 that was never proceeded</p> <p>6 with, and an arrest for two alleged section 20 offences</p> <p>7 that were said to have occurred on the same day. That</p> <p>8 was made into an affray, which was not proceeded with,</p> <p>9 and he ended up with a conviction for dangerous driving?</p> <p>10 A. Well, that is what we know now, yes.</p> <p>11 MR BEER: Sir, I am looking at the time. It is 4.30, and</p> <p>12 that is a convenient moment.</p> <p>13 THE CHAIRMAN: Is that a convenient point at which to</p> <p>14 adjourn for the day?</p> <p>15 All right, thank you. Are content to resume at</p> <p>16 10.30 tomorrow or would you prefer to start earlier?</p> <p>17 MR BEER: 10.30 is fine, thank you, sir.</p> <p>18 THE CHAIRMAN: Okay.</p> <p>19 (4.31 pm)</p> <p>20 (The Inquiry adjourned until 10.30 am the following day)</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 184</p>

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24
25

I N D E X

MR ROBERT COUSEN (sworn)1

Questions from MR BEER1

A				
A6 83:5	action 6:19,25 7:1,8 22:2 64:6,21,22 95:13 172:15	136:16 137:2 138:13 182:22 184:8	and/or 156:7,23	Anthony's 69:5 78:23 114:14
Aaron 28:8 77:13 77:15 78:2 97:6	actions 6:18,19,23 7:2,6,14,16	AFO 64:21	Andrew 10:3 12:21 15:13,13 39:1 163:5	anticipated 117:17
able 24:18,21 56:12 114:8 172:20 174:14	activation 150:13	AFOs 63:12,16,21 65:10,19 66:4,11 66:25 67:7 146:5 146:7,13 156:4,21	Andy 12:20,20 150:21,24 159:24 160:7,15	anybody 99:22 125:10
absent 6:17 48:21	active 149:14	afternoon 54:9	Ann 38:2,20 39:16	anymore 22:16
absolute 87:8	activity 28:23 44:24 45:11 60:21	aggrieved 90:8	ANPR 12:17	apologies 7:6
absolutely 23:12,19 40:25 65:13 91:21 112:8 114:7 144:14,14 148:10 149:25 160:2 165:12,20 168:8 172:5	actual 8:15 11:7,16 15:11 22:15 23:24 49:1 51:5 54:25 85:18 95:15 121:10 131:16 138:21 139:16 159:25 163:2 168:11	ago 14:3 18:2 54:3 67:18,18	answer 16:22 22:20 26:9,10 33:16 37:2 50:22 51:24 52:5,22,24 54:2,8 55:7 56:13 62:18 63:25 64:2,25 65:8 68:2 73:24 73:25 76:17 77:23 81:14 100:22 105:17 126:7,20 133:2,3 161:3 167:19 183:5	apparent 22:18
abstracted 21:13	add 21:7	agree 92:21 112:11 125:1 153:2 156:4 156:20,24 157:2 157:12 172:8,20 173:18 177:15,21 177:22 179:4,6,8	answered 90:23	appear 88:21 101:6 155:15 169:12
AC 32:18,19	added 16:1,6,8 172:24	agreed 113:1	answering 22:22 47:8	appears 92:14
ACC 150:11	additional 102:5	ahead 155:13	answers 53:24 55:13 66:22 68:2	application 59:8 66:10
accept 146:6	addressed 62:1 133:10	AKA 28:8	Anthony 68:24 69:8 70:11,15 75:2 76:15 77:7,8 78:1,2,3,24 79:2,6 79:6,11 90:21 93:18 96:18 101:2 101:3 102:21 103:11 104:19 105:7 107:7 110:1 110:5,8 111:1,6 111:15,18 117:8,9 119:2 122:12 123:11 126:17 131:25,25 137:1 137:12 138:16 156:5,10,12,21 163:24 168:25 170:22 173:1 179:1	appointed 20:18 39:7,9
access 13:20,21 14:4 15:9 16:20 16:23 17:4,7,18 18:16,18,20,21 48:19 70:25 71:9 72:4,6,9,10 78:25 103:24 139:13	Adequate 19:10,11 19:15,19,20 20:22 20:23	allegation 89:15,17 110:22,24 112:2 132:12,19 133:2 133:20 179:5,8	answered 90:23	approach 58:21 74:2
accessed 14:19 15:1	adhering 133:5	allegations 83:12 93:11,18 94:11,14	answering 22:22 47:8	appropriate 9:9 47:4
account 162:3	adjourn 184:14	allege 111:1	answers 53:24 55:13 66:22 68:2	approval 27:12
accuracy 54:17 55:9 57:18 63:23 153:12 165:18 167:25	adjourned 184:20	alleged 89:20 93:3 94:17 95:25 96:7 132:21 184:6	Anthony 68:24 69:8 70:11,15 75:2 76:15 77:7,8 78:1,2,3,24 79:2,6 79:6,11 90:21 93:18 96:18 101:2 101:3 102:21 103:11 104:19 105:7 107:7 110:1 110:5,8 111:1,6 111:15,18 117:8,9 119:2 122:12 123:11 126:17 131:25,25 137:1 137:12 138:16 156:5,10,12,21 163:24 168:25 170:22 173:1 179:1	approved 27:1
accurate 54:14,16 61:22 62:4,11,13 62:15 63:7,10,14 63:18,19 64:4 68:17 111:22 130:16 146:4 154:13 176:23 184:4	adjournment 61:17 94:4 108:14	alleging 100:24 175:23	answering 22:22 47:8	approx 161:13
accused 86:12,14 90:4 107:19	admin 171:20	allocated 7:6	Anthony 68:24 69:8 70:11,15 75:2 76:15 77:7,8 78:1,2,3,24 79:2,6 79:6,11 90:21 93:18 96:18 101:2 101:3 102:21 103:11 104:19 105:7 107:7 110:1 110:5,8 111:1,6 111:15,18 117:8,9 119:2 122:12 123:11 126:17 131:25,25 137:1 137:12 138:16 156:5,10,12,21 163:24 168:25 170:22 173:1 179:1	approximately 161:16 162:16,22
acquittals 120:7	administrative 39:4	allocates 7:17	answering 22:22 47:8	approximating 55:22
acquitted 101:7	adopt 76:19 130:18	allocation 29:5	answers 53:24 55:13 66:22 68:2	April 3:20 94:18,23 94:23 99:11
	advice 34:16 151:22	allow 66:9 170:10	Anthony 68:24 69:8 70:11,15 75:2 76:15 77:7,8 78:1,2,3,24 79:2,6 79:6,11 90:21 93:18 96:18 101:2 101:3 102:21 103:11 104:19 105:7 107:7 110:1 110:5,8 111:1,6 111:15,18 117:8,9 119:2 122:12 123:11 126:17 131:25,25 137:1 137:12 138:16 156:5,10,12,21 163:24 168:25 170:22 173:1 179:1	area 19:18,22 31:23 48:14 58:10 58:10 68:24 77:6 118:8 158:10
	adviser 57:22 151:7 152:25 153:9,16	allowed 40:15 111:9	answering 22:22 47:8	areas 46:11 85:5
	advisers 57:3 151:9	alluded 37:6 46:10 46:12 79:1 103:5	answering 22:22 47:8	argue 135:2
	affray 81:5 82:6 119:5,14 120:15 120:16,17 122:11 122:24,25 124:10 124:17 135:18	amount 113:23 156:2 164:20	answering 22:22 47:8	argued 111:24
		analyse 145:15	answering 22:22 47:8	arisen 34:21 37:12 156:20
		analysis 145:18	answering 22:22 47:8	arises 29:13 30:14
			answering 22:22 47:8	arising 182:12
			answering 22:22 47:8	armed 19:21 39:25 40:1 97:4 154:11

154:21,22,25 159:5 arose 158:2,14 arrest 27:24 28:23 29:16,18 30:12,20 31:11 33:1,5,9 34:18 37:8 45:20 46:22 47:1 53:21 53:22 58:20,25 129:11,14 168:5 172:14 179:24 182:11 184:5,6 arrested 31:1 32:19 37:10 39:25 40:1 54:20 84:6,10 85:10,11,12,16 86:8 87:10 90:1,6 92:13 93:7 95:11 97:3,15,16 103:10 103:12 107:5,8 121:19 125:10 126:12 129:9,18 159:16 175:3,5 178:24 182:16,18 arresting 28:17 30:1 36:23 arrests 85:19 99:23 103:11 120:4,7 125:12 169:12 179:21 181:11,21 182:2,20 183:24 183:25 184:3 arrival 155:24 164:17 arrive 155:24 161:18 164:17 articulate 179:16 articulated 46:14 46:25 Ascot 95:25 96:1,2 96:6 112:14,15 Ashton-on-Ribble 95:2 asked 14:11 24:10 38:5,6,7 39:4,15	39:15 40:8 62:24 70:22,23 71:22 72:1 73:20 76:21 82:16 90:21 105:16 109:23 117:20,20,23 118:10 123:24 124:9 127:17 134:6 136:5,8 138:24 144:1,5 172:10,12 184:1 asking 22:20 31:20 33:11 52:3,4,7 60:14 63:25 115:9 116:19 123:10 124:18 157:6 176:5 assault 87:16,16 89:18 181:16 182:10 assaults 87:11,22 assertion 133:9 136:4 assess 69:17 74:2 145:15 assessed 47:4 126:24,25 154:20 155:4 167:16 176:22 assessing 47:23 48:4 58:3 assessment 22:4,13 23:4,10,14,17 25:24 26:2,5,9,13 26:15,19 37:14 42:8,16 46:23 48:17,24 53:14 62:3,15 63:6 68:14,17 73:16 74:5 77:18 133:13 139:24 145:6,11 145:18,21 147:5 178:2 assessments 47:25 48:5 61:21 62:10	67:14 146:5,7 assets 28:3 associated 84:18,18 assumption 88:5 assured 135:16 attached 32:22 159:2 attachment 106:13 attend 40:8 116:7 attended 40:5 attending 40:7 115:5,24 attention 106:11 attribute 182:7 Audi 77:5,11 83:4 142:4 143:1,8,8 143:15 August 161:5 authorisation 66:10 authorised 25:9 26:24,25 30:3 63:12 65:1 140:1 authorising 27:2 authority 24:23 50:16,17,19 58:5 58:17 59:9 69:7 76:1 114:16 166:8 166:9 167:11,12 167:14 automatic 12:18 automatically 104:21,22 availability 60:1 available 18:24 24:18 59:19 68:18 71:1 73:19 119:1 128:8 153:19 avenue 34:21 average 20:7 aware 10:6,21 15:13 16:12 17:13 17:16 31:9 39:18 40:7 50:6 61:20 62:9,12 63:5,8,9	63:11 67:3,4,6 71:4 78:13 81:3 82:24 96:1,2 98:22 106:14 109:14,22 124:14 128:10 135:24 145:23 156:9,11 156:13 163:3 166:12 176:5 <hr/> B <hr/> b 66:10 155:5 158:7 back 7:5 8:20 11:10 27:5,9 37:13 44:8 55:12 58:11 69:15 75:4,15 77:25 92:14 99:5 100:4 103:22 104:3 105:4,14 108:25 122:24 125:20 127:11 130:7 131:24 135:3 136:5 139:5 151:24 154:5 159:23 165:16,17 167:2 170:8 174:19 175:20 180:6,11 background 42:6 bad 135:15 bag 109:14 balance 24:20 bald 130:15 136:4 bank 10:1 12:20 155:23 164:16 Barker 97:7 base 114:3 based 36:7 47:24 48:5,18,24 49:21 57:10,10 66:22 67:19,22 68:18 128:24,25 basic 7:11 basically 41:19 basis 6:22 8:13,14	8:23 9:13,14 10:17 33:25 66:5 67:1,10 69:7,8 112:11 114:6,7,12 114:16,21 116:12 119:9 120:3 122:2 127:19,22 128:10 130:21 131:3 132:22 178:7,17 178:21 bear 141:22 152:14 bearing 12:19 27:8 33:22 105:11 113:7 163:2 Beer 1:3,4,10,11,11 20:9 45:9 47:17 57:7 61:19 63:5 77:20 83:17 89:4 92:8 93:22 94:1,6 94:7 101:10 107:12,22 108:3,7 108:11,16,20,24 109:3,5,7,9 118:18,24 119:1 136:13 138:20 145:19 164:4 174:1 180:21,22 180:25 184:11,17 185:4 beginning 4:18 117:6 behalf 1:13 35:12 62:19 behave 47:15 behaviour 130:5 172:23 beings 61:8 belief 2:14 3:5 76:13 161:19 believe 46:11 143:20 156:4 believed 14:3 45:1 45:13 68:21 154:10 bell 138:19
--	--	--	--	---

benefit 179:6	158:22	148:1,5,7,9,10,10	140:11,14 150:3	carrying 173:20
best 2:14 3:4 37:16	breathing 51:16	148:12,12,18,22	160:13 167:2	Cartwright 1:12
40:25 144:6	brew 147:22	148:23 149:1,5,7	181:5	case 8:8,10,11,11
better 52:17,21	bridges 38:19	149:21 150:21,22	Bureau 11:21	8:16 14:20 15:3
56:13 87:7 184:2	brief 53:20 65:15	150:23 151:3,6	38:10 118:6	15:23 17:4,13,23
bin 9:11,13	66:11,14,15 70:10	153:1,9,17,22,25	burglary 45:13	20:22 21:1 26:10
birth 123:25	72:4 78:14,15	154:5 155:7 158:8	Bury 32:19	29:21 30:22 33:12
bit 16:5 47:10	91:20 109:14	160:16,20 162:9	business 77:10	44:6 49:17 57:5
48:11 64:2 108:6	114:8 117:4	163:11 164:9	butter 106:3	64:18 91:2 109:14
108:11 133:1	131:25 133:23	165:6,7,13,14,19		111:5,7,19 112:13
140:12 173:21	153:19,22,22,23	165:23,23,25	C	112:17 117:23
bits 61:7	166:3,6	166:17,19,21,24	C 79:21 94:19	130:19,21,21,23
blank 99:16 152:19	briefed 57:2 75:23	168:10,11,12,20	97:23 118:14	130:24 142:16
Bloggs 53:17	75:23 114:5	170:9,14,16 171:6	155:5 158:16	casebook 5:20 24:1
BMW 77:4	117:10 123:4,11	171:24 172:3	C/25 118:21,24	cases 33:20 130:13
bold 106:24	123:13 131:11	173:7,16 174:19	C/54 96:12	cash 159:7
Bolton 77:5 92:3	132:2 133:24	175:12 176:12	C/585 148:21	categories 109:20
99:6,6,11	137:1 144:25	177:7,11,14,25	C/704 125:22	caught 122:22
book 4:24 5:6,15	169:17 170:21	179:20 183:18	180:19,22,23	cause 122:18
21:8,13 23:18	171:25 172:1	briefings 50:1 51:5	C/759 118:19,23	123:16 124:10
25:14 32:7,9,24	173:1	51:24 57:4 134:20	cabinet 18:23	145:20
74:9,10 142:2,19	briefing 48:25 49:1	134:22 141:10	cadre 57:3 61:25	caused 27:21 58:6
151:9 152:24	49:3,8,9,13,25	144:3 165:9 167:8	62:22 65:2 66:14	77:6 122:13,15
booklet 66:20,21	50:25 51:15,22	167:9 171:23,24	78:14,18 105:15	123:1,3
152:9	52:9 54:3,16,17	briefly 75:24	118:10 176:10	causes 143:20
booklets 66:23	54:18,25 55:1,1	bring 103:8	cadres 67:21,25	Causing 82:13,14
books 22:10 23:24	55:15,18 56:1,16	broad 4:9 26:18	calendar 138:14	cent 20:11,12 62:13
31:17 46:12	56:24 57:19,23	32:25 33:8 172:8	call 76:5 79:2,6	122:20
Boothtown 143:3	64:3 70:20 71:21	broader 126:3,7	129:16 140:20	central 9:4
143:17	71:25 72:2 78:17	broke 155:23	142:17,18,23	ceremony 39:14
borne 36:19,20	79:4,7,9 90:20	164:16	called 7:23 9:18	certainly 8:7 10:23
bottom 15:21 18:8	105:11 114:21	broken 161:13,16	19:10 39:23 69:10	13:23 21:24 24:8
25:21 77:19 87:15	115:12 116:14,23	162:16	69:13 101:25	33:16 36:17 38:10
89:3 100:10	117:5,20 123:7	brother 19:21	calling 79:4 157:24	47:1 60:11 69:24
132:20 138:14	131:24 132:1	91:13 111:9	157:25	71:8 74:3 77:21
180:2	134:21 136:10	brought 60:10	calls 139:4	82:18 93:25 97:20
box 28:7 29:3 46:4	137:23 138:1,12	105:25 107:20,24	camera 143:9,10	99:2 107:25 124:4
46:6,9 52:1	138:22 139:4,5,23	Buckley 38:2,20	cameras 53:18	124:5 139:19
123:20	140:6,7,9 141:7	39:16	capability 58:25	156:8 175:3 179:1
Brady 28:8	141:14 142:2,20	build 38:19 169:2	155:1 169:3	cetera 36:22,22
Branch 14:16	142:24 143:13,21	Bulmer 28:21 37:7	capacity 24:20	122:14
24:17 37:20 40:22	143:24 144:4,20	bundle 32:1 45:6	captured 182:15	chairman 1:3,6 5:5
73:9	145:1,15 146:17	82:4 94:19 106:8	carefully 63:2	6:24 7:12 9:3
bread 106:3	146:21,21 147:1,8	110:11,12,13	carried 78:16 125:9	45:2,5 47:14
break 53:24 61:14	147:13,19,20,25	121:1 125:14,22	carry 38:17 130:4	61:15 62:23 63:1

83:16 89:2 92:7 93:25 94:2,6 101:8 107:11,25 108:4,8,19,23 109:2,4,7 118:17 118:23 164:3 180:20,23 184:13 184:18 chance 34:2 116:9 116:21 137:19 160:2 change 168:19 changed 60:5 charge 34:17 86:8 86:10 101:9,9,10 101:14 109:25 charged 86:13,14 88:8 90:6 92:4 93:7 100:16 101:3 101:6 102:8 103:13 110:8,9 111:6,19 112:21 112:22 113:6 Charges 120:5 charity 18:15 chat 59:19 check 19:19 54:16 54:25 55:8,10 57:18 100:18 118:10 138:21 165:18 checked 106:19,19 146:15 checking 51:19 105:5,19 167:17 checks 57:25 chief 3:13 110:19 children 18:14 choose 153:18 chose 145:14 Christian 18:15 chronological 14:14 chronologies 13:12 chronology 10:7	13:9,15,17,20 14:11,25 15:10 16:2,6,9,14 73:10 74:24 75:5,9 Church 77:6 circle 17:24,25 circumstances 3:8 29:22 35:3,18 40:16 83:7 City 88:15 clarity 87:9 Clark 10:3 13:6,8 16:13,15 17:6 20:21 Clark's 13:7 clear 41:9 62:21 67:12 68:3 70:8 70:14,18 116:22 161:2 cleared 116:2 clearly 28:15 30:25 46:15 63:9 64:2 65:16 115:13,14 127:9 173:1 click 128:3 client 177:2 CLIO 6:19,24 7:1 7:15 close 10:16 clue 118:9 codes 86:6 collar 86:24 92:13 92:19 collate 11:23 collective 78:13 collectively 93:10 College 133:11 column 43:21 85:20 86:22 92:17 95:14 102:15 combination 177:15 combined 43:18 come 7:5 8:20 11:10 27:5,9 35:7	39:10,11 41:16 53:2 55:12 59:19 75:4,15 81:6 93:19 98:2 105:4 106:1 117:11 126:5,5 135:19 143:10 156:19 157:15 175:20 177:2 comes 17:10 21:10 42:3 78:4 163:10 168:6,7 coming 24:3 63:16 141:19 commander 48:7 57:21 58:22 59:1 59:6,8,12 61:10 63:6,16 65:14,16 66:4 69:10,24 71:22 114:9 134:7 139:25 140:1 144:24 149:18,18 149:19 150:11,14 153:10 156:15 168:4 commander's 156:17 158:17 commanders 61:22 66:21 74:1 134:14 commenced 4:10 4:11 24:8 38:22 commencement 3:9 commences 23:8 commit 97:4 111:6 137:12 138:16 174:24 175:1,9 176:3,13,16,18,24 177:17,20 178:5 178:15,19 committed 84:7 89:20 93:12 97:9 107:8 177:3 common 50:23 52:7 101:19 173:18	communities 20:4 community 27:19 43:1 compare 92:19 complainant 90:11 complainants 108:21 complete 21:21 24:9 completed 7:9 22:13 24:7 25:3 26:6,16 152:24 completely 20:13 166:9,10 173:10 completes 7:18 completing 7:16 complex 147:12 component 27:1 compromised 42:20 compromising 28:18 computer 71:6 149:14 concentrating 158:8 concern 83:5 122:13,15,18 123:3,16 124:11 concerned 46:18 99:11 concerning 46:9 83:13 117:12 concerns 43:1 123:1 conduct 49:2,7,19 50:23 51:1 52:21 conducted 4:15 7:8 46:23 61:21 62:3 62:10,15 63:6 69:25 72:14 110:17 134:20,21 137:23 139:24 169:13 183:15 conducting 17:9	45:20 154:17 conducts 49:3 confirm 80:22 148:16,22,25 159:23 connected 84:16,19 99:19 conscious 53:17 consecutive 88:16 88:25 consent 88:22 consider 27:7 33:1 33:8 46:7 139:22 considerably 145:23 consideration 27:4 29:5,25 30:2,18 34:18 35:14 36:23 37:2 46:16 59:25 considered 5:10 29:14 30:15 36:14 46:25 133:13 151:17 consistency 60:9 consistently 95:5 conspiracy 34:17 35:1 97:3 100:16 101:9,10 103:13 103:17 111:6 112:23 113:9 139:7 175:21 176:15 conspired 137:12 138:16 174:22 175:1,6,8,15 176:3,13,18,24 177:17 178:5,14 178:19 179:13 conspires 177:19 constable 8:8 24:24 110:19 contact 37:19 39:9 40:5,15,17,19 41:7,12 55:3 70:16 144:15
---	--	---	--	---

contacted 31:17 32:3 74:15 152:5	Coordination 11:18,20,22 41:8	covert 28:18 29:23 30:2,7 37:23 42:6	current 53:7,8 127:16 131:6,13 132:23 148:14	137:15 138:5 156:14 159:13 163:13 173:2
contain 104:6,15 125:16,24	copied 166:25 170:3	CPS 34:15 86:7,9 111:1 132:21 133:9	currently 45:16	Davies's 177:2
contained 102:16 103:4 104:14 105:25 111:2 148:18	copies 18:2 116:16	create 138:8,10	custodial 31:8 33:19 34:20 35:2 35:15	day 5:14 15:25 30:8 33:24,24 65:7,7 106:6 109:6 129:22 144:18 162:11 163:11 170:1 177:25 184:7,14,20
contains 56:25 57:2 108:20 151:11	COPU 9:2,3 10:23 11:1,2,7,7,16,17 18:2,6,10,18 71:12 109:17	created 10:7 25:12 25:13	custody 85:11	day-to-day 6:22 8:14 10:17 20:1,2 77:9
content 54:11 73:17 184:15	COPUs 11:25	creators 127:6	custom 134:25	daybook 4:25 5:2 142:22
contents 2:13 3:4	copy 10:24,25 11:2 116:16 128:8	cribs 25:12	cut 29:10 58:15 117:18 145:12,14	daybooks 31:18
context 36:9	Corkovic 28:8 42:4 77:13,14,15 78:2 78:2,3	crime 19:17 22:1 28:4 29:13 38:11 48:13 67:17 71:18 71:20,23,25 84:6 84:13,16,19 86:17 88:2 90:3 92:16 95:13,14,16,18 96:22 97:18 99:10 100:18 101:24 102:1,3,15,19 103:17 104:5,5,18 105:9 106:25 107:2,9 113:5 127:25 175:17 176:1 178:23 179:3 180:3	cutting 145:10	days 4:13 24:16
contingencies 151:21	Corkovics 12:25 35:9	crimes 84:5 85:7,14 85:15 86:25 90:22 92:24 96:2 183:9	D	daytime 166:11
continued 179:20	correct 3:1 7:19 18:1 59:10 68:21 81:15 83:10 111:5 142:9 146:7,12 150:18 157:19 165:3 168:18 184:1	criminal 44:24 45:11 138:14	D 185:2	DC 12:12,15 13:4,5 13:6,7,8,18,19 14:3 15:23 16:5 16:13,15,17 17:6 17:13 20:21 25:4 37:21 38:1 39:23 41:3 72:16,25 98:1,11,11,11 113:14
continues 112:1 174:20	costs 112:25	criminality 27:24 28:12 29:16,19,19 30:12 33:2,9,18	dah 123:25,25,25 123:25	DCI 32:13,15
continuing 153:11 168:3,7,8	couple 7:22 16:10 24:16 137:25 183:24	crimials 31:9	daily 5:21 8:13,23 9:13,14	deal 24:21 70:2 71:24 140:6
control 36:13 43:21	course 7:3 14:13 26:22 28:15 33:14 44:9 53:3 57:11 61:25,25 62:2,5,6 66:12 111:3 115:10 133:22 137:19 140:3 157:1 175:14	criteria 126:2,7	damage 82:13,14	dealing 67:24 130:25 131:1,4,10 134:14 139:8 152:20,21
convenient 61:13 93:23 184:12,13	courses 66:12	critical 61:20 62:14 65:11 146:4	danger 46:13	dealt 67:23 94:8,11
conversations 177:22	court 11:4 88:19,20 89:6 101:6 124:25	CROPS 45:21	dangerous 58:19 78:19 89:4 124:13 137:3 182:23 184:9	Deane 77:6
convicted 19:21 81:25 92:6 97:7 119:16,17 129:5 137:2,2 176:15,19 177:8 179:12,19	courteous 115:21	cross 152:23	Dareton 39:23	death 66:6 67:10
conviction 27:25 30:12 80:4,7 83:11,13 89:11 122:8 124:25 125:7 128:24,25 136:2 172:17 173:24 176:7,8 184:9	courtesy 115:20	crossed 167:20	dash 86:16	Debbie 7:25 10:2 38:25
convictions 78:21 79:21 80:10,16,18 80:23 81:1,7,12 81:16 94:9 120:3 120:4 125:12 126:6	Cousen 1:4,5,6,11 61:20 62:23 94:8 158:23 185:3	Crown 88:16	date 2:24 4:17 5:12 5:21 6:1 11:5,6 18:2,5 52:15 84:6 95:24 106:19 113:9,10 123:24 127:25 128:1 171:18	Deborah 6:6 16:12 18:20
	cover 153:4 172:8	Culcheth 142:6,12 143:1,16 163:9	dated 1:18,23 2:1,5 2:7,10,19,21,23 132:10,24 133:10	debrief 163:5
		cup 10:17	dates 18:7 89:6 92:22 105:23 112:23 130:11	December 2:11 81:20 83:8 87:17

87:20 88:10 119:5 119:11 182:11,13 182:20 decide 25:8 decided 4:15 26:23 37:3 49:14 90:11 deciding 33:9 decision 16:24 33:5 36:5 58:4,21 59:4 63:22 95:6 97:16 151:22 158:18 decision-making 58:16 112:6 decisions 5:11 65:11 66:6 67:2,9 112:5 114:3,4 116:12 decks 116:2 deemed 30:4 35:24 35:25 36:4,7 66:19 86:5 136:20 deeming 36:2,5 defence 110:19 defendant's 112:25 definitely 35:3 157:17 degree 64:7 deliberately 28:13 delivered 56:19,21 57:6 Delta 122:21,22 129:13 demanded 161:18 demands 24:19 57:9 department 121:25 171:21 departments 11:22 depend 29:22 63:22 64:7 66:1 depended 147:23 depending 10:22 depends 12:6,9 30:22 33:13 61:4 130:10,25,25	131:1 147:22 148:3 deploy 6:11 25:14 50:16,17,19 deployed 31:6 50:12,14,18 114:7 140:3 141:24 165:15 173:10 deploying 19:4 31:10 63:8 122:14 deployment 23:11 58:5,17 66:10 69:6 75:24 105:13 114:4 124:5 148:15 153:6,8 166:7,9,11,11,12 166:13,14 167:20 deployments 45:21 68:24 Deputy 6:6,15 14:20 15:2 Derek 112:17 descriptions 99:21 descriptive 121:20 129:13 descriptor 129:23 desk 10:2 desks 10:2 12:20 detail 8:21 55:12 75:15 81:6 117:10 detailed 152:22 details 62:7 75:2 80:16 detected 90:4 95:12 95:15,17,18 Detective 3:11,12 3:13 6:5 8:8 24:22,24 25:1,2,6 25:7 48:22 determine 12:5 127:13 determines 29:18 develop 38:14 development 4:14 41:9	devoting 21:4 DI 18:13 38:20 158:23 dictate 130:23 173:15 dictated 35:3,18 128:21 166:10 difference 110:7 112:4,5 different 20:13 22:22 29:22 30:23 31:10 52:19 73:22 73:24 74:3 76:17 92:22 126:6 127:3 128:4 166:9,10,14 167:14 173:10 179:3 183:13 differently 74:2 179:7 difficult 20:9,14 36:9 diminished 28:17 direct 11:19 12:8 39:18 41:7,12 46:2 117:18 direction 82:8 100:18 101:5,11 160:5 directly 12:3,5 disagree 125:2 disclosed 109:15 disclosure 13:10 disconnect 38:9,12 discover 107:1 discovered 124:15 discuss 10:19 172:6 172:7 discussion 38:19 dishonesty 80:19 dismissed 101:10 109:25 110:5 111:8,20 112:24 disposal 103:15 dispute 45:16 disqualified 35:5	82:10 88:9,24 disrupt 29:15,20 30:16 31:11,14 35:22 disseminate 11:25 disseminated 9:9 14:18 distance 144:12 distinguishing 155:3,10 distracted 141:24 distribute 109:3 division 42:5 divisional 4:5,6 document 10:8 13:20 14:10,14,19 14:21 15:10 16:20 17:2 18:8 22:16 22:17 23:2 27:14 34:8,13 42:14,16 44:2 45:5 46:18 55:9,10,18 56:3 57:13,23 60:15 74:25 88:19 98:17 107:23 108:12,17 109:20 113:11 116:16 151:5 153:18,21,24 160:6 170:24 173:5 174:4 documented 21:8 47:2 documents 91:16 91:17 109:13 115:5,6,11,14 116:10,14 doing 12:18 19:13 20:16,22 27:8 36:10 42:5,6 47:20 51:14 77:9 83:3 95:23 105:18 107:22 130:18 139:16 149:15 155:6 160:17 161:24 165:16	171:5 Donaldson 97:6 doubt 39:13 40:4 60:12,18 download 142:4 143:1,15 144:11 dozen 19:3 dozens 85:7 165:10 165:10 DR 136:1 dragged 85:2,19 87:3 102:15 107:13 180:4 draw 151:24 drawn 106:12 drink 148:4 drive 106:15,16 driver 76:15,25 78:20,24 155:5 driving 35:6 46:12 46:24,24 80:20 81:19 82:10 87:20 88:7,9,23,24 89:4 89:11 119:10 124:13 137:3 179:25 182:23 184:9 drop 9:12 drug 36:18 drugs 36:21,24 37:8 120:15 122:19 129:12 DS 6:15 8:6 13:4,16 16:12,16 17:2 18:20 25:5,6 105:24 106:5 142:3,17,25 143:15 DSU 72:14 141:24 144:10 Duddridge 25:2 due 44:24 45:11 46:2 duplication 86:25 duties 21:14 45:20
---	--	---	---	--

duty 144:11	73:1 114:17,23 115:4	establishment 97:9	expected 64:3	109:24 111:5
<hr/> E <hr/>		et 36:22,22 122:14	expecting 144:10	112:3 116:6
E 185:2	employed 50:6	ethical 43:14	experience 63:21	119:15 120:21
ear 55:2 141:18	enable 68:13	event 43:16 83:8,9	66:14 67:20,24	124:12 141:21
earlier 95:6 96:18	enables 62:22	89:10 123:2	134:14	146:8 150:7 151:9
101:24 102:12	ended 13:9 95:1	124:22 128:7	expertise 148:11	161:22 162:18
105:14 169:9	182:22 184:9	142:7	experts 119:24	179:5,9,24
183:1 184:16	ends 2:10 66:24	everybody 140:17	169:21	fail 64:21
early 55:6 158:12	enforcement 44:4	141:3	explain 6:24 9:3	fair 51:8 77:15,20
easy 26:11,12	44:18	evidence 8:18	11:20 33:12 84:2	101:22 104:2
Echo 117:22	engaged 154:10	13:25 27:23 28:11	84:25 87:8 102:14	133:12 143:23
Economic 43:13	enquiries 7:2,8	28:16 30:11 31:6	108:17 114:13	fairly 51:9
effectively 5:2 18:9	12:16 13:10	34:17 36:25 37:4	135:10 136:13	falling 34:25
86:2	ensure 63:11	58:23,24 59:18	137:20 138:20	familiar 7:12
egs 44:14	entered 73:10	69:10 72:23 86:4	158:4 177:6	family 69:5 79:13
eight 37:10 50:12	enterprises 138:14	86:8,9,10 90:7	explained 102:12	far 20:15 124:14
50:19	entries 5:21 75:10	95:6,7,8 100:12	144:2 158:9 180:4	128:7 142:14
either 39:16 72:14	138:2,3	100:25 101:12	explains 5:9 103:9	179:24
74:18,25 75:1	entry 5:15,24 24:4	111:24 112:12,19	121:20	feasible 29:16
110:7 161:11	25:19 32:12 34:12	112:20 113:1,3,5	explore 34:21	featured 70:11 77:8
167:5,10 171:1	50:9 94:22 103:18	113:14 135:18	124:4,7	96:3 131:16
elect 153:17	104:4 105:6 142:2	156:9,11	extent 98:14 156:21	181:13
electronic 49:9	143:6,7,20 173:11	evidential 90:10	extra 27:10 114:10	February 1:1 31:23
51:5 153:22	178:7	exactly 37:11 62:6	extreme 132:24	34:10 105:12
171:24 173:7	equipped 129:14	84:14 103:21	133:10	106:5,14,17
176:12	equivalent 170:17	105:23 110:10	<hr/> F <hr/>	108:18 119:2
element 86:25	erroneous 111:2	136:6 153:7	F 26:14 143:4	feet 169:2
eliminate 43:22	error 135:23	161:22 166:17	160:9	felt 68:15 126:25
eliminated 85:21	156:19,20,24,25	170:11	F/1175 149:3	127:15,16
85:22,22,25 86:11	157:1,2,3,4,5,9,10	exaggerated 64:14	F/1265 146:19	females 53:3
95:3 97:6,8,13	157:12,16,17,24	example 9:10 12:24	F/1267 146:18	fence 157:6
Ellison 69:14	157:25 158:14	18:12 20:21 29:23	F1 37:13	Fernandes 18:13
else's 145:15	161:7,9 178:18	31:3,14 33:17	F6 42:15	FI 159:6
166:19 177:13	errors 54:14	34:1 35:4 49:22	face 46:17 59:19,20	FIB 38:7 39:2
email 10:7 11:19	144:13 146:6	52:9 53:16 65:3	98:17 142:7 177:4	41:13,24 119:23
12:2,8 59:24	167:6	86:6,7 97:17	182:19	126:24 169:21
72:20,20,22 98:2	escape 156:2	104:16 147:1	faced 101:15	field 83:20 84:9,15
98:7 106:13,17	164:20	Excalibur 7:23,25	facilitate 37:22	fields 85:20
114:22,24 115:19	essence 31:7 65:15	33:23 67:23	facility 128:7	file 8:11,14,17
115:20 159:21	131:5	exchanged 36:22	fact 2:10 11:23	26:14 34:5 37:13
160:24,25,25	establish 79:17	exhibits 13:1,2	15:14 31:6,16	47:5 79:21 82:6
163:2 170:1,1	80:3 81:25 130:5	expect 52:14 65:22	35:13 64:15 72:20	83:16 86:9 96:12
emailed 11:13,15	established 100:12	65:23 123:4,10,15	79:23 90:10 91:12	98:5 101:21
11:16,17 12:5	100:24 119:16	126:13 127:3	93:6 105:24	103:20,21 110:1,5
	179:5,9	146:25 183:17,21		111:4,9,16 115:25

118:14 132:16 143:4 146:17 154:2 158:16,18 160:13,13 filed 7:9 files 4:17 108:2 fill 129:13 filter 67:7 financial 27:20 97:4 161:13,17 162:17 163:9 find 1:18 15:17 31:24 126:13 129:11 136:6 160:10 170:14 174:14 180:14 finding 86:2 fine 23:12 31:8 184:17 finishes 99:16 125:21 firearm 159:6 firearms 32:20 45:15 47:25 48:7 50:3,5,7,11 54:3 54:16,18 55:1 56:11,12,24 57:3 57:18,19,21 58:4 58:17,22 59:1,6,8 59:12 61:10,21,24 61:25 62:3,22 63:6,8,13,16 64:1 65:1,6,7,11,14,16 66:4,14,20 67:21 67:25 69:7,9,24 71:21 74:1 75:25 78:14,18 79:9 80:24 81:10 105:14 114:6,9,16 115:24 116:8 121:6 123:4,10 124:5 127:10 131:11,21 132:5 133:23 134:7,14 134:22,24 136:10	136:25 137:13,22 138:1,6,15,17 139:14,21,25 140:1 144:24 148:5,10 149:19 150:11,14 151:1 153:9 156:15,17 157:12 158:17 162:8 165:9 166:7 167:10,12,13,20 168:4 170:7 171:19,22,23 173:20 174:24 175:2,9,16,23 176:4,9,10,25 177:4,16,18,20 178:6,20 first 3:23,25 5:15 5:24 10:17 14:10 19:12 22:3,6,8 23:13 24:10 26:4 26:8 38:22 42:11 43:1 52:24 58:20 68:23 74:21 78:14 79:20 92:10 95:23 117:9 118:18 131:23 136:11 137:22 138:2 141:14 144:15,25 147:8 149:5,11 150:6 152:5 164:3 164:4 165:24 170:10 181:12,13 183:8 firstly 38:1 47:24 81:25 112:11 fit 101:12 112:24 fits 87:3 Fitton 150:15,21,24 159:24 160:7,15 160:20 161:2,25 162:12 five 52:15 74:25 75:12,13,18 103:16 107:4,13	107:17 108:10 136:15 143:23 152:21 178:24 flavour 39:1 flick 155:9 flow 37:21 41:4,6 41:18,24 focus 167:6 focused 28:13 folder 1:14 83:14 folders 116:1 folks 154:8 follow 26:1,3 followed 103:1,2 47:24 71:4 184:20 following 25:10 47:24 71:4 184:20 follows 84:8 145:4 145:13 foolish 115:8 foot 45:23 88:15 132:19 footage 136:23 force 3:17 9:10 11:21 14:15 20:19 24:17 37:20 38:9 40:22 44:11 73:8 85:5 102:13 118:5 force-wide 4:7 forced 155:25 164:18 forensic 102:8 forget 40:6 175:11 form 108:20 121:20 123:20 129:13 152:10 formal 67:19,21 format 60:15,17 formed 77:12 132:22 formulated 68:14 forward 114:3 138:11 164:1 forwarded 106:11 Foulkes 110:18,23 111:14,17,23	112:1 found 10:9 92:4 124:20 125:10 136:21 163:7 170:5 175:7 four 2:16 3:4 51:16 75:13 78:6 103:16 103:19 136:15 141:15 148:17 149:17 152:21 159:15 163:20 171:12 177:1 fraud 31:21 33:4,5 34:1 Fred 53:17 fresher 44:12 Friday 74:8 front 1:13 4:24 23:24 75:5,9 150:9 153:4 FRU 3:17 fulfil 6:17 full 51:15 158:22 function 55:8 158:9 171:21 functional 20:20 functions 118:6 further 4:16 66:18 95:9 99:5 100:4 124:4 145:18 172:15 future 60:3	general 8:14 19:24 20:6 44:23 45:10 47:7,17 58:2 80:6 97:23 146:25 generally 6:14 77:5 gentleman 47:9,12 159:14 getting 70:22 87:7 113:7 167:20 give 20:10 26:20 30:18 36:23 37:2 43:18 52:9 53:22 55:3 56:15 62:12 62:22 65:8 69:10 70:20 84:6 108:25 114:8,24 115:20 116:8 117:5 124:6 142:11 164:21 173:21 177:18 given 13:25 16:20 16:23 17:4 34:16 34:18 35:14 50:19 51:15 54:15 60:14 61:2,2 64:4,21 66:8 67:12 68:3 73:15 74:4,6 97:24 108:17 116:19 120:22 123:15,17,19 124:4 130:2 146:4 146:5,9,14 148:5 161:8 177:7 gives 53:4 84:5 121:10 giving 20:8 171:7 GMP 9:7 15:24 42:19 45:19 97:5 108:24,25 121:25 122:20 133:6 135:23 GMPics 9:18 85:2 85:3 101:25 102:1 102:2,5,12,16,16 103:3,4,7,7,24 104:6 105:6,20,21
G				
G2 99:7 G2/759 100:7 G2/763 108:3 gained 28:4 gang 33:23 gangs 20:4 67:24 Gary 10:4 12:13,16 12:19,25 159:21 161:1 163:7 gather 58:23 gathering 58:23				

105:24 106:1,2,3	115:15,23 116:13	169:7 170:22	hacksaw 161:20	84:25 93:4 97:22
106:4,20 107:2,14	116:15,17 129:14	174:22 175:1,23	162:10 163:6,8	108:6 109:13
107:18 113:20,24	130:7,14 136:23	175:25 176:24	half 51:17 76:7,9	126:2
180:5 182:15,17	138:7 140:3,6	177:17 178:8	149:17 152:18	helping 53:25
go 1:15 5:18 9:7	142:6 149:17	180:12 181:10	170:12 171:12	Heywood 150:11
10:18 21:25 23:5	153:24 156:19	Grainger's 71:10	hand 38:15 52:8	high 43:17 44:24
23:18 24:25 34:3	160:19,21 165:14	76:13 79:14,25	65:4 125:19	45:11 69:23 70:5
35:18 37:13 44:8	165:15 166:18	91:13 94:8 102:21	155:25 160:19,21	128:20 129:16
51:6 52:17 54:16	167:2 171:1,22	111:1,15 122:17	164:19	highest 69:18 70:21
54:17 57:7,7	172:2,5 174:4,6	Granby 52:12	handgun 155:25	70:24 78:16
58:25 62:2,5,6	175:19 176:20,25	69:13,14 71:2	156:7,23 157:15	highlighted 93:13
65:15 80:12 84:11	177:1 180:6	72:5 73:19,20	164:18	highly 173:17
85:10 88:4 92:14	181:22	74:3,6 144:15	hands 167:23	hindsight 179:7
100:4 104:22	good 12:17 17:15	145:5,13,17,25	Hanley 58:10	history 79:15 80:7
105:14 106:17	34:2 53:11 135:14	146:3 154:7,21	happen 37:5 51:10	83:1,12 161:11
112:24 114:3	140:17 156:1	166:3,6,15 169:20	59:4 64:13 71:20	Hmm 137:4
116:13 117:4	164:19	grand 39:14	happened 35:9,10	hold 23:1,1 27:5
118:12 120:25	grabbed 132:6	grant 58:4	52:10 82:22 94:18	52:19 138:18
121:18,18 125:20	137:17 138:3,4,5	granted 69:7	102:7 137:14	139:8 180:14
127:1,4,11 131:24	170:24 180:8	great 19:15 75:15	168:16	holding 135:3
135:17 136:5	182:5 183:7	greatest 70:6	happening 36:7	hole-punch 29:10
139:4,5 148:6,6	Grainger 68:13	Griffiths 53:12	38:18 39:6 43:17	hole-punches 133:4
149:20,21 155:13	71:5,18 77:12,18	101:20 105:7	60:2	HOLMES 7:11
159:23 164:1	78:1,2,3 79:5,11	111:10 113:19	happens 33:13	honest 143:22
165:18 167:9,14	79:18 80:9,22	126:25 175:17	53:23 55:20 117:3	165:9
168:5 170:8	81:21 83:23 87:10	Griffiths' 178:7	138:8	hope 152:23
180:11	88:8 89:25 91:17	ground 5:12 66:25	happy 73:12	hour 76:7,9
goes 41:25 42:21	92:4,6 93:7,12,18	group 17:21 38:11	113:25	hours 144:20 145:1
84:2,3 99:13	95:2 97:3,5 98:18	69:22 70:3 173:19	harm 27:20 43:4,25	162:16
121:24 151:14	98:25 99:19 100:3	176:1	44:3,17,17,18	house 50:9 53:18
152:10	100:9,13 101:2,3	groups 19:17 44:17	46:5	huge 173:23
going 6:21 8:20	101:15 103:20	guidance 66:8	head 10:2 47:10	human 61:8
17:8 20:1 25:8	104:19 105:7	67:12 68:1 128:22	heading 29:7 43:4	hunt 19:6
26:21,22 30:25	107:7,7 109:25	129:21	43:9	Hurst 6:6,15 8:6
34:3 38:8 40:21	110:1,2,5,6,8	guidelines 133:6	health 110:20	13:4,16 16:12,16
42:10 46:22 48:8	111:6,10,18	guilty 88:12 92:5	hear 157:22 177:1	17:2 18:20 24:22
51:19 55:12 61:23	112:12,21 113:4	175:7	heard 20:15 40:10	38:25 48:22 98:11
62:12 65:18,18	114:18 119:2,16	gun 33:23 157:15	72:23 93:6 103:6	105:24 106:5
68:2 69:10,13	123:5,11 125:5,8	173:24	135:18 146:6	142:3,25 143:15
75:4,15 76:15	125:13,25 126:17	gunpoint 155:24	157:21 165:4,8	hypothetical 36:8
78:24 80:11 81:6	131:25,25 132:23	164:18	heightened 31:22	hypothetically 36:8
85:16 93:19 98:13	137:1,12 138:16	guns 20:4 67:23	held 50:14 155:24	65:5
99:5 103:10	156:5,10,21	153:13	164:17	
105:14,15 109:10	158:25 159:19		hell 146:2	
113:20 115:12,13	163:19 168:25		help 13:3 80:22	
		H		I
				IA 24:6,8,11,13

25:23 ICU 41:20 identified 37:19 41:3 69:3 117:9 identities 13:3 imagine 128:2 immediate 33:21 123:1 immediately 21:25 21:25 128:14 179:19 imminent 64:15 impact 43:17 implicate 86:4 implicated 95:20 98:25 implicating 98:23 imply 97:8 importance 61:20 62:9,14 63:5,11 65:11 67:13 146:4 important 53:5,19 53:21,21 54:23 61:7 62:17,21 65:13,17 69:4,11 115:2 124:2 131:7 131:9 136:8 175:13,14 impression 17:18 39:3 177:19 imprisonment 88:13,16 inaccurate 64:20 incident 8:2,4 32:19,20 71:23 72:17,24 81:4,19 82:2,24 83:8 87:20 88:7 89:11 90:15,18 94:17 119:10 161:20 179:25 182:12 incidents 31:23 33:6 including 73:8 inclusion 126:2,8	127:20,22 128:16 129:16 130:3 incorrect 46:21 68:20 181:25 India 117:22 119:4 indicate 90:5 95:12 125:8 indication 76:6 indictment 100:23 individual 12:6 42:3 67:13 68:13 78:12 130:10,13 162:23 individualise 78:11 78:17 individually 90:12 individuals 42:19 77:25 130:12 industry 27:20 infancy 9:16 inferred 163:23 influence 133:12 information 10:5 17:10,22 24:25 48:4,6,10,17,19 53:19 54:15 57:20 58:4 59:6,15 60:7 61:1 62:13,21 63:15,17,19,23 64:4,7,20 65:9,13 65:22,24,25 66:3 66:5,8,25 67:2,3,4 67:6,11 68:4,13 68:15,18,20 70:25 71:5 72:3,9,12,16 73:9,13,15,18,21 74:4,7 76:2 90:14 91:3 97:19,24 98:1,14 102:1,2,5 102:16 103:5 104:6,14 105:25 107:13,14 108:21 111:2 113:18,23 113:24 114:8,10 116:23 117:2,3,12	120:22 121:10,16 122:8,10 123:8 124:2,8 127:15 129:17 130:6 131:2 132:6,7 135:3 136:6,22 137:17 138:4,5,25 145:5,16,20,24 146:13,15 147:4,6 148:13,16,25 152:4,14,16 154:8 154:24 155:2 156:14 159:2 161:21 162:7 164:21,23,24 165:8 166:16 168:4 170:25 173:22 176:11 178:2,9,17,21 180:8 182:4,16 183:7 information/intel... 151:12 informed 168:18 initial 25:4 49:17 53:11,14,23 137:17 initially 17:17 85:10 initiate 59:5 initiating 59:2 injured 82:15 injury 45:19,24 inquiries 37:22 102:9 165:16 inquiry 1:13 11:11 16:2,9 46:3 109:15 184:20 inside 173:8 insofar 16:5 inspector 3:11,12 3:13 150:15 161:2 162:12 institutions 97:5 163:9	instructed 35:10 instructions 5:3,4,7 5:8 insufficient 34:17 101:11 integrity 54:25 intel 32:18 149:21 175:12 intelligence 4:13 8:13,23,25 9:2,7,7 9:8,11,12,17,20 9:22 10:20,23,24 11:7,18,20,21,22 13:9,11,14,17 14:11,14,15,16,25 15:10,10,14,24,24 15:25 16:2,6,8,14 17:5,7,12,14,20 20:25 23:21 24:15 24:17 25:12 28:22 36:17 37:15,16,20 37:21 38:9,14 39:5 40:22,23 41:4,6,7,9,16,18 41:20,21,24 42:2 42:3,19,19 45:15 47:23 48:4,6,24 49:17 51:15 53:7 53:9,10 54:19,20 56:14,16,25 57:2 57:18 58:24 59:7 60:6 63:12 64:18 66:16 72:12 73:9 73:10,14,18 74:19 75:5,9 96:3 97:1 98:23 99:2 114:11 117:5 118:6,8 120:8 122:21 125:8,11 126:5,12 127:1,17 128:24 131:2,6,14 132:22 136:2 137:10 138:24 145:19 148:5,13 150:16 150:19,25 151:7	152:14,16,20 153:1,5,7,12 154:17 155:18,21 156:11,13 159:2 159:12,14 160:1 163:14,21,25 164:12 166:10 167:16,25 168:6 171:7 172:11 176:21 intelligent 4:14 intent 182:25 interest 124:3 interested 14:23 54:12 intervene 35:4,8 interventions 33:24 interview 110:17 interviewed 77:24 77:24 85:14,16 109:24 introduce 140:21 introduced 141:3 142:10 introducing 141:5 intrusive 30:5 investigate 111:21 166:22 investigated 135:6 investigating 5:8 6:9 36:3 investigation 7:3 8:15 10:5 19:5,5 22:1 24:16,21 28:18 29:4,7 30:23 31:15 33:2 33:4,14 37:7,17 37:24 41:1 48:8 53:2,4,6,6 54:22 57:12 71:8 85:23 86:1,11 102:7 131:4 145:22 investigations 19:6 30:5 69:25 82:19 134:23
---	--	--	--	---

investigative 22:4 22:13 23:3,9,14 23:17 25:24 26:1 26:5,8,13,15,19 37:13	job 19:14 21:2 51:16 140:5 159:15 163:20 167:15 177:13,21	knew 39:6 104:5 105:14 113:16 126:10,15 129:9 146:2 164:23 169:15	184:10	160:19
investigators 46:2	joined 3:16 106:1,2	knife 129:15	knowledge 2:14 3:5 74:17 155:3	left-hand 92:16 150:3
involve 153:8,11	judge 101:5 112:24	knives 20:4	known 10:5 169:18	legal 43:11
involved 12:9 19:20 20:3,12 32:18 35:23 36:18 38:21 45:1,13 50:3,5 156:10 157:14 159:5,11,19 162:1 162:2 171:11	judge's 100:17 101:11	know 1:7 13:23 15:7 16:22 17:22 19:4,25 22:18 24:7 32:23 38:2 39:18 40:11 44:15 46:11 49:11 50:8 51:3,8,13,14,20 51:23 53:19 61:9 62:2,5,6,16,18 64:6,24 65:6 66:2 68:19 69:9 74:13 77:17 83:7 87:24 88:1 89:7,8 90:17 91:12,15 93:1,3 96:6,10 100:14 101:2,16,17 102:13 105:17,24 106:5 120:13 121:9 122:7,11,11 123:23 124:9,18 126:20 127:19,21 130:2 131:11 135:6 136:10 137:20 138:8,13 138:18 139:2 146:3 147:12,19 149:22,23 155:6 155:11 157:23 158:5 160:6 162:14 163:23 165:1 166:2,15,18 170:13,13 171:2,5 171:14,19,20 172:6,14,22 173:8 173:12 174:8,17 175:25 177:22,24 178:14,16,16 179:17 183:14	knows 149:20,20	Leigh 19:22
involvement 27:23 28:11 30:11 46:3 94:15	juvenile 172:16 173:23	knifed 129:15	<hr/> L <hr/>	LEM 42:23
involving 80:23 81:1,12 82:1 94:15	<hr/> K <hr/>	knives 20:4	lady 39:23	lends 63:18
IPCC 2:17 14:11 64:18 110:24 132:13	K 4:20 23:25 32:1	know 1:7 13:23 15:7 16:22 17:22 19:4,25 22:18 24:7 32:23 38:2 39:18 40:11 44:15 46:11 49:11 50:8 51:3,8,13,14,20 51:23 53:19 61:9 62:2,5,6,16,18 64:6,24 65:6 66:2 68:19 69:9 74:13 77:17 83:7 87:24 88:1 89:7,8 90:17 91:12,15 93:1,3 96:6,10 100:14 101:2,16,17 102:13 105:17,24 106:5 120:13 121:9 122:7,11,11 123:23 124:9,18 126:20 127:19,21 130:2 131:11 135:6 136:10 137:20 138:8,13 138:18 139:2 146:3 147:12,19 149:22,23 155:6 155:11 157:23 158:5 160:6 162:14 163:23 165:1 166:2,15,18 170:13,13 171:2,5 171:14,19,20 172:6,14,22 173:8 173:12 174:8,17 175:25 177:22,24 178:14,16,16 179:17 183:14	laid 40:25 54:24 161:17	lesser 33:25 34:2
irrespective 145:13	K/1248 143:4	know 1:7 13:23 15:7 16:22 17:22 19:4,25 22:18 24:7 32:23 38:2 39:18 40:11 44:15 46:11 49:11 50:8 51:3,8,13,14,20 51:23 53:19 61:9 62:2,5,6,16,18 64:6,24 65:6 66:2 68:19 69:9 74:13 77:17 83:7 87:24 88:1 89:7,8 90:17 91:12,15 93:1,3 96:6,10 100:14 101:2,16,17 102:13 105:17,24 106:5 120:13 121:9 122:7,11,11 123:23 124:9,18 126:20 127:19,21 130:2 131:11 135:6 136:10 137:20 138:8,13 138:18 139:2 146:3 147:12,19 149:22,23 155:6 155:11 157:23 158:5 160:6 162:14 163:23 165:1 166:2,15,18 170:13,13 171:2,5 171:14,19,20 172:6,14,22 173:8 173:12 174:8,17 175:25 177:22,24 178:14,16,16 179:17 183:14	Lane 77:6	let's 14:23 22:8 33:17 44:16 53:15 59:19 88:5 96:23 96:25 110:10 118:18 120:25 136:9 180:11
issue 46:7 109:10 133:25	Karen 39:23	know 1:7 13:23 15:7 16:22 17:22 19:4,25 22:18 24:7 32:23 38:2 39:18 40:11 44:15 46:11 49:11 50:8 51:3,8,13,14,20 51:23 53:19 61:9 62:2,5,6,16,18 64:6,24 65:6 66:2 68:19 69:9 74:13 77:17 83:7 87:24 88:1 89:7,8 90:17 91:12,15 93:1,3 96:6,10 100:14 101:2,16,17 102:13 105:17,24 106:5 120:13 121:9 122:7,11,11 123:23 124:9,18 126:20 127:19,21 130:2 131:11 135:6 136:10 137:20 138:8,13 138:18 139:2 146:3 147:12,19 149:22,23 155:6 155:11 157:23 158:5 160:6 162:14 163:23 165:1 166:2,15,18 170:13,13 171:2,5 171:14,19,20 172:6,14,22 173:8 173:12 174:8,17 175:25 177:22,24 178:14,16,16 179:17 183:14	Lapniewski 37:21 38:1 41:3	letters 136:1
items 16:6 75:1	keen 22:18 32:23	know 1:7 13:23 15:7 16:22 17:22 19:4,25 22:18 24:7 32:23 38:2 39:18 40:11 44:15 46:11 49:11 50:8 51:3,8,13,14,20 51:23 53:19 61:9 62:2,5,6,16,18 64:6,24 65:6 66:2 68:19 69:9 74:13 77:17 83:7 87:24 88:1 89:7,8 90:17 91:12,15 93:1,3 96:6,10 100:14 101:2,16,17 102:13 105:17,24 106:5 120:13 121:9 122:7,11,11 123:23 124:9,18 126:20 127:19,21 130:2 131:11 135:6 136:10 137:20 138:8,13 138:18 139:2 146:3 147:12,19 149:22,23 155:6 155:11 157:23 158:5 160:6 162:14 163:23 165:1 166:2,15,18 170:13,13 171:2,5 171:14,19,20 172:6,14,22 173:8 173:12 174:8,17 175:25 177:22,24 178:14,16,16 179:17 183:14	law 44:3,17 134:10 134:11	level 133:11,17
<hr/> J <hr/>	keep 10:25 17:20 17:20	know 1:7 13:23 15:7 16:22 17:22 19:4,25 22:18 24:7 32:23 38:2 39:18 40:11 44:15 46:11 49:11 50:8 51:3,8,13,14,20 51:23 53:19 61:9 62:2,5,6,16,18 64:6,24 65:6 66:2 68:19 69:9 74:13 77:17 83:7 87:24 88:1 89:7,8 90:17 91:12,15 93:1,3 96:6,10 100:14 101:2,16,17 102:13 105:17,24 106:5 120:13 121:9 122:7,11,11 123:23 124:9,18 126:20 127:19,21 130:2 131:11 135:6 136:10 137:20 138:8,13 138:18 139:2 146:3 147:12,19 149:22,23 155:6 155:11 157:23 158:5 160:6 162:14 163:23 165:1 166:2,15,18 170:13,13 171:2,5 171:14,19,20 172:6,14,22 173:8 173:12 174:8,17 175:25 177:22,24 178:14,16,16 179:17 183:14	Lawler 71:1 72:4 73:14,15,25 74:18 82:18,25 114:23 116:9 117:4,4 148:18 150:14,23 152:5 156:16 159:10,17 160:22 162:3,4,7,25 164:8,21 165:3 166:15	liabilities 34:15
James 39:23	kind 10:20,22 19:3 20:2,19 28:16 31:14 33:6,24 36:9,9 38:16,18 39:6,14 53:14 58:6,20 63:25 67:18 72:16 77:6 77:9,20 79:1 83:4 87:9 102:12 106:2 129:20,24 132:15 145:21 168:17 171:13,21	know 1:7 13:23 15:7 16:22 17:22 19:4,25 22:18 24:7 32:23 38:2 39:18 40:11 44:15 46:11 49:11 50:8 51:3,8,13,14,20 51:23 53:19 61:9 62:2,5,6,16,18 64:6,24 65:6 66:2 68:19 69:9 74:13 77:17 83:7 87:24 88:1 89:7,8 90:17 91:12,15 93:1,3 96:6,10 100:14 101:2,16,17 102:13 105:17,24 106:5 120:13 121:9 122:7,11,11 123:23 124:9,18 126:20 127:19,21 130:2 131:11 135:6 136:10 137:20 138:8,13 138:18 139:2 146:3 147:12,19 149:22,23 155:6 155:11 157:23 158:5 160:6 162:14 163:23 165:1 166:2,15,18 170:13,13 171:2,5 171:14,19,20 172:6,14,22 173:8 173:12 174:8,17 175:25 177:22,24 178:14,16,16 179:17 183:14	Lawler's 117:14 145:11 150:7 158:17	lie 82:6 101:21 103:20 110:1,5 111:4,9,16
Jamie 77:14,15 78:3	kind 10:20,22 19:3 20:2,19 28:16 31:14 33:6,24 36:9,9 38:16,18 39:6,14 53:14 58:6,20 63:25 67:18 72:16 77:6 77:9,20 79:1 83:4 87:9 102:12 106:2 129:20,24 132:15 145:21 168:17 171:13,21	know 1:7 13:23 15:7 16:22 17:22 19:4,25 22:18 24:7 32:23 38:2 39:18 40:11 44:15 46:11 49:11 50:8 51:3,8,13,14,20 51:23 53:19 61:9 62:2,5,6,16,18 64:6,24 65:6 66:2 68:19 69:9 74:13 77:17 83:7 87:24 88:1 89:7,8 90:17 91:12,15 93:1,3 96:6,10 100:14 101:2,16,17 102:13 105:17,24 106:5 120:13 121:9 122:7,11,11 123:23 124:9,18 126:20 127:19,21 130:2 131:11 135:6 136:10 137:20 138:8,13 138:18 139:2 146:3 147:12,19 149:22,23 155:6 155:11 157:23 158:5 160:6 162:14 163:23 165:1 166:2,15,18 170:13,13 171:2,5 171:14,19,20 172:6,14,22 173:8 173:12 174:8,17 175:25 177:22,24 178:14,16,16 179:17 183:14	lawyers 68:7	life 31:15 33:22 35:20,23 36:12 66:6 67:10
January 2:1 3:2 50:15 58:8 69:4 69:15 92:11,23 123:7 131:24 137:22 170:9,15 170:16 180:7 181:12 182:25	kind 10:20,22 19:3 20:2,19 28:16 31:14 33:6,24 36:9,9 38:16,18 39:6,14 53:14 58:6,20 63:25 67:18 72:16 77:6 77:9,20 79:1 83:4 87:9 102:12 106:2 129:20,24 132:15 145:21 168:17 171:13,21	know 1:7 13:23 15:7 16:22 17:22 19:4,25 22:18 24:7 32:23 38:2 39:18 40:11 44:15 46:11 49:11 50:8 51:3,8,13,14,20 51:23 53:19 61:9 62:2,5,6,16,18 64:6,24 65:6 66:2 68:19 69:9 74:13 77:17 83:7 87:24 88:1 89:7,8 90:17 91:12,15 93:1,3 96:6,10 100:14 101:2,16,17 102:13 105:17,24 106:5 120:13 121:9 122:7,11,11 123:23 124:9,18 126:20 127:19,21 130:2 131:11 135:6 136:10 137:20 138:8,13 138:18 139:2 146:3 147:12,19 149:22,23 155:6 155:11 157:23 158:5 160:6 162:14 163:23 165:1 166:2,15,18 170:13,13 171:2,5 171:14,19,20 172:6,14,22 173:8 173:12 174:8,17 175:25 177:22,24 178:14,16,16 179:17 183:14	lay 9:25 69:2 117:24 155:23 164:16	lift 117:19
January/February 105:13	kind 10:20,22 19:3 20:2,19 28:16 31:14 33:6,24 36:9,9 38:16,18 39:6,14 53:14 58:6,20 63:25 67:18 72:16 77:6 77:9,20 79:1 83:4 87:9 102:12 106:2 129:20,24 132:15 145:21 168:17 171:13,21	know 1:7 13:23 15:7 16:22 17:22 19:4,25 22:18 24:7 32:23 38:2 39:18 40:11 44:15 46:11 49:11 50:8 51:3,8,13,14,20 51:23 53:19 61:9 62:2,5,6,16,18 64:6,24 65:6 66:2 68:19 69:9 74:13 77:17 83:7 87:24 88:1 89:7,8 90:17 91:12,15 93:1,3 96:6,10 100:14 101:2,16,17 102:13 105:17,24 106:5 120:13 121:9 122:7,11,11 123:23 124:9,18 126:20 127:19,21 130:2 131:11 135:6 136:10 137:20 138:8,13 138:18 139:2 146:3 147:12,19 149:22,23 155:6 155:11 157:23 158:5 160:6 162:14 163:23 165:1 166:2,15,18 170:13,13 171:2,5 171:14,19,20 172:6,14,22 173:8 173:12 174:8,17 175:25 177:22,24 178:14,16,16 179:17 183:14	lead 34:19 35:2,15	lifted 77:4 117:14
jargon 179:15	kind 10:20,22 19:3 20:2,19 28:16 31:14 33:6,24 36:9,9 38:16,18 39:6,14 53:14 58:6,20 63:25 67:18 72:16 77:6 77:9,20 79:1 83:4 87:9 102:12 106:2 129:20,24 132:15 145:21 168:17 171:13,21	know 1:7 13:23 15:7 16:22 17:22 19:4,25 22:18 24:7 32:23 38:2 39:18 40:11 44:15 46:11 49:11 50:8 51:3,8,13,14,20 51:23 53:19 61:9 62:2,5,6,16,18 64:6,24 65:6 66:2 68:19 69:9 74:13 77:17 83:7 87:24 88:1 89:7,8 90:17 91:12,15 93:1,3 96:6,10 100:14 101:2,16,17 102:13 105:17,24 106:5 120:13 121:9 122:7,11,11 123:23 124:9,18 126:20 127:19,21 130:2 131:11 135:6 136:10 137:20 138:8,13 138:18 139:2 146:3 147:12,19 149:22,23 155:6 155:11 157:23 158:5 160:6 162:14 163:23 165:1 166:2,15,18 170:13,13 171:2,5 171:14,19,20 172:6,14,22 173:8 173:12 174:8,17 175:25 177:22,24 178:14,16,16 179:17 183:14	leader 49:25 155:5	light 68:2
Jason 1:11	kind 10:20,22 19:3 20:2,19 28:16 31:14 33:6,24 36:9,9 38:16,18 39:6,14 53:14 58:6,20 63:25 67:18 72:16 77:6 77:9,20 79:1 83:4 87:9 102:12 106:2 129:20,24 132:15 145:21 168:17 171:13,21	know 1:7 13:23 15:7 16:22 17:22 19:4,25 22:18 24:7 32:23 38:2 39:18 40:11 44:15 46:11 49:11 50:8 51:3,8,13,14,20 51:23 53:19 61:9 62:2,5,6,16,18 64:6,24 65:6 66:2 68:19 69:9 74:13 77:17 83:7 87:24 88:1 89:7,8 90:17 91:12,15 93:1,3 96:6,10 100:14 101:2,16,17 102:13 105:17,24 106:5 120:13 121:9 122:7,11,11 123:23 124:9,18 126:20 127:19,21 130:2 131:11 135:6 136:10 137:20 138:8,13 138:18 139:2 146:3 147:12,19 149:22,23 155:6 155:11 157:23 158:5 160:6 162:14 163:23 165:1 166:2,15,18 170:13,13 171:2,5 171:14,19,20 172:6,14,22 173:8 173:12 174:8,17 175:25 177:22,24 178:14,16,16 179:17 183:14	leading 27:24 30:12	limited 151:4
Jay 97:6	kind 10:20,22 19:3 20:2,19 28:16 31:14 33:6,24 36:9,9 38:16,18 39:6,14 53:14 58:6,20 63:25 67:18 72:16 77:6 77:9,20 79:1 83:4 87:9 102:12 106:2 129:20,24 132:15 145:21 168:17 171:13,21	know 1:7 13:23 15:7 16:22 17:22 19:4,25 22:18 24:7 32:23 38:2 39:18 40:11 44:15 46:11 49:11 50:8 51:3,8,13,14,20 51:23 53:19 61:9 62:2,5,6,16,18 64:6,24 65:6 66:2 68:19 69:9 74:13 77:17 83:7 87:24 88:1 89:7,8 90:17 91:12,15 93:1,3 96:6,10 100:14 101:2,16,17 102:13 105:17,24 106:5 120:13 121:9 122:7,11,11 123:23 124:9,18 126:20 127:19,21 130:2 131:11 135:6 136:10 137:20 138:8,13 138:18 139:2 146:3 147:12,19 149:22,23 155:6 155:11 157:23 158:5 160:6 162:14 163:23 165:1 166:2,15,18 170:13,13 171:2,5 171:14,19,20 172:6,14,22 173:8 173:12 174:8,17 175:25 177:22,24 178:14,16,16 179:17 183:14	learn 13:22,24 15:16	line 8:5 162:14
	kind 10:20,22 19:3 20:2,19 28:16 31:14 33:6,24 36:9,9 38:16,18 39:6,14 53:14 58:6,20			

load 31:5	117:16 118:18	lost 40:23	146:22 147:1	127:6 129:5 134:4
locate 146:19	119:14,19 120:25	lot 19:13 20:5 21:6	148:18,22 149:5	135:7 150:19,25
locate/trace 84:11	121:5 122:20	44:12 67:24 76:14	150:10 154:1	154:19 165:11
located 55:5	127:11 128:2	76:22 77:12 78:4	158:19 164:9	182:10 183:5
location 143:8,9	130:11,16 132:14	86:6 112:9 131:7	marker 52:18	means 6:25 35:6
locked 11:3 18:23	133:3 136:9	131:8 138:11	118:11 119:4,9	36:2 42:20 84:15
log 11:7 41:16	137:15,16,24,25	146:2,2	120:11,23 121:22	85:22 86:14,17
123:23 150:8	139:11 140:11	lots 17:22 128:4	122:21,23 125:4	95:18
151:10 152:8,22	142:10,21 144:13	152:19 165:14	125:16 126:8,16	meant 121:9
156:17 158:18	146:17 150:2	low 43:17 69:23	127:23 128:10	128:23 129:1
159:24 160:15	152:6,8,13,16,17	120:19 128:15,18	129:13,25 130:6	measures 42:22
logs 18:3,10,18	158:14,16 161:1	128:19,23 129:1,3	134:17 137:5	43:22 167:14
23:21 71:14	164:6 167:14	129:4	171:3 174:7,8	medium 43:17
long 2:9 3:14,17	168:20 170:8	lower 76:14,22	markers 117:13,19	44:24 45:11 169:2
7:20 74:8,13 76:3	171:16 180:9,11	77:13 78:4 112:9	117:21,25 118:12	meeting 38:25 39:8
84:12 108:10	181:15 183:8	lowest 69:19	120:3 121:6,17	39:10 40:5,6,8
133:18,21 152:10	looked 22:12 24:17	lunch 174:15	122:1 123:21,22	115:3
152:25 157:7	24:19 72:19 83:11	Luncheon 94:4	123:25 124:1,2,6	member 171:16
longer 85:25	91:16 93:14 98:13		126:3 127:3,20	members 13:3
Longsight 4:1	101:22 102:18,19	M	128:16 130:7,8,11	27:20 64:12 72:14
look 1:16 2:17 4:17	104:4,7,12,20	machine 173:24	130:12 131:15,16	173:6
4:20 12:24,25	106:22 124:19	main 6:18	132:10,24 133:5	memory 107:22
14:2,4 15:18,18	126:19 136:19,21	major 21:21	133:24 134:23,25	132:15
20:6 25:17 26:13	147:15 169:18	majority 33:20	135:7 136:12	men 160:18 173:19
27:14 31:18 33:17	173:2 178:13	70:22 80:19	massively 39:20	mention 48:2 98:18
34:5,12 42:12	183:1,19,23,23	making 5:21 31:9	MASTS 50:10	99:18 100:3
43:25 44:9,16	looking 6:11 9:21	31:11 36:5 37:16	mate 41:20	146:10 163:12,16
49:13,13,15 51:6	15:19,20 23:23	59:11 151:22	material 104:24	180:9
52:17 53:15 59:18	28:20,21 30:10	160:8 182:4	130:17	mentioned 8:20
68:7 74:9 76:5	32:6 35:16 42:25	male 169:2	matrix 171:17	12:12 18:2 36:11
78:1,12,12,18	44:16 46:4 48:12	man 19:5 78:20	matter 66:6 67:10	40:21 60:5 73:25
79:14,21 80:16	48:13,13,14,15	173:20 177:3,19	70:15 111:18	78:24 82:17,21
82:4,7 83:11,14	73:5 77:25 80:6	manage 37:20 41:3	119:23 169:21	100:1,10 101:24
86:21 87:21 88:20	81:4,6 87:24 88:1	41:6,18,24	173:18	109:16 132:4
89:16,22 90:3,12	88:2 89:5,10	managed 45:17	MC 32:18,19	156:16 163:6
90:24 91:5 92:8	93:10 101:14	management 6:20	McGlone 112:17	178:13 180:7
93:4 94:17 95:15	108:4 115:21	7:1	113:14	mentioning 35:13
95:25 96:12,25	122:16 123:23	Manchester 88:15	mean 13:19 17:6	71:18
98:3 99:7,13	125:5,19 135:25	manner 46:12,24	26:25 27:5 35:15	mentions 82:11
100:7 103:24	142:1 160:18	March 2:7 19:2	37:5 38:12 41:6	menu 86:18
104:16,23 106:8	165:13 179:17	50:11,20 51:12	41:18 69:12 85:21	merits 29:21 33:13
107:9,19,23	181:14,21 184:11	70:12 96:1 98:2,7	85:24 86:12,16	met 74:18 90:10
110:10 113:10,20	looks 44:16 161:9	113:16 114:20	88:2 95:5,17	115:7
114:23 115:2,7,20	166:17 182:1,8,20	123:11 133:23	97:12,13,14	MG5 112:19
116:21 117:11,13	loss 27:21	138:12 140:18	106:11 125:7	113:13

middle 28:7 34:13 89:17	164:20	national 71:6 128:18,21 133:6,7 133:10,17,25	nice 53:13	object 162:19,20,22
Mike 114:23 117:4 145:11 148:18	month 103:14 170:12	natural 51:9	Nicky 34:15	objective 28:10
Millett 31:17 32:4 32:13,15	months 3:21 19:12 51:17 52:15 67:18 67:18 88:16,25,25 149:17 152:21 171:12	nature 22:1 37:23 44:25 45:12	night 56:18 142:6 142:12 143:1,16 144:25 145:8 163:5 166:7,13 169:24	objectives 24:5 25:22 26:20 27:15
Mills 10:4 12:12,15 13:5 72:16 98:1 98:11 159:21 161:1 163:7	months' 88:12	necessarily 31:2,5 31:8 51:20 53:20 71:20 120:17	nine 37:10 67:18 103:14	observation 165:15
mind 12:19 21:11 27:8 33:22 34:5 34:25 44:12 60:25 105:11 113:8 152:14 163:2	Moore 34:15	necessary 29:15 30:6,16 66:19	nominal 96:20 97:1	observations 25:11 25:11 38:15 45:21
mine 32:10 83:15 125:21	moral 43:13	need 7:2 17:21 35:4 35:22 58:21,25 60:3 62:7 63:11 66:23 97:18 106:17 114:8 124:3 130:15 137:25 138:25 145:21 160:25 165:17 170:8 172:21 173:3,14 173:21	nominated 37:19 38:1,4 44:10	obtain 27:23 28:11
minimise 43:23	morning 10:18 55:21 56:6,7,18 98:2,7 138:12 139:18 140:17 149:6 158:12 163:3	needed 4:16 6:13 12:17 18:20 24:25 25:13 35:8,24 36:1,12 74:19 105:17	non-affray 124:12	obtained 68:12
minor 90:18 157:2	motor 45:14 85:11	needs 11:11 17:10 62:3 108:24 129:24	non-violent 80:10 80:18	obtaining 24:22 30:10 47:23 48:4 58:3
minute 174:1	mouth 68:9	never 27:9 29:25 39:6 60:25 64:1 65:1 67:16,18 70:16 77:8 97:16 101:15 135:19 143:23 154:24 155:1 159:16 168:16 177:21 184:5	normally 15:8 90:5	obviously 30:19 31:19 32:21 46:10 66:13 68:21 69:9 90:20,23 102:17 105:22 118:7 121:17 123:6 126:23 141:18 146:2 160:16 162:12 172:6,18 181:24
minutes 108:10,11 115:18,19 141:15	move 45:25 55:6 168:20 181:16	needn't 128:24	north-west 154:11	occasion 51:10,13 55:6 56:15 58:8 82:23 115:16,17 116:19 117:9 139:17 158:13 165:22,25 172:25
misleading 64:14 132:10 165:7 166:16 179:4	moved 77:2,11,11	needs 11:11 17:10 62:3 108:24 129:24	note 27:16 148:21 149:3	occasions 11:18 21:8,9,11,23 33:21,25 34:4 50:14 136:14 139:3,14 144:1
misled 16:1	movement 65:4 143:10	never 27:9 29:25 39:6 60:25 64:1 65:1 67:16,18 70:16 77:8 97:16 101:15 135:19 143:23 154:24 155:1 159:16 168:16 177:21 184:5	noted 136:19 138:23	occur 117:17
missing 29:9	multi 20:19	new 10:19 54:18 56:14 93:24 145:19,20,21 171:15	notes 156:17	occurred 20:17 148:14 184:7
mistake 91:12 101:20 111:13 112:3 173:23	multi-tasked 13:8	NFA 173:23	November 18:12 88:6 110:18	OCG 117:6
mistaken 14:21 106:7,10	multiple 67:15		number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	OCG's 44:23 45:10
MO 161:19	Mulverhill's 72:25		North 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	OCGs 45:16
mobile 22:14 23:11	murder 91:10,14 91:18 92:5 172:17 173:25 181:24		note 27:16 148:21 149:3	October 3:14 4:12 5:12,22,24 19:2 22:5 24:4,7,9 25:19 26:6,16,17 27:16 38:24 74:24 89:20,23 107:8
model 42:23	Murphy 97:7		noted 136:19 138:23	
moment 8:21 18:2 36:10 47:18 48:15 49:4 52:1 61:13 75:4 88:5 93:20 93:24 105:4 109:11 114:17 115:1 154:9,10 156:19 180:16 184:12	N		notes 156:17	
money 156:2	N 185:2		November 18:12 88:6 110:18	
	name 1:11,21 4:11 4:24,25 19:16 20:25 24:15 78:23 84:16,18 99:21,25		note 27:16 148:21 149:3	
	named 84:13 99:1 103:17		noted 136:19 138:23	
	names 79:3,8,10 107:13,17		notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	
			noted 136:19 138:23	
			notes 156:17	
			November 18:12 88:6 110:18	
			number 11:16,22 12:18 21:7,23 23:21 29:22 45:3 70:3 80:9 84:3 92:13 96:22 100:18 103:9 104:5 105:9 134:15 160:9 168:25 171:22 178:25	

112:22 146:1 offence 29:14 30:15 30:21,25 34:2,19 34:25 35:1,14 80:14 84:12 85:12 85:13 86:3,5 88:9 89:2,12 90:1 92:10 93:3 95:3 97:10 100:13,23 101:4,7 111:3,19 119:14,15 120:23 127:25 156:10 161:4 163:8 offences 31:2 34:1 36:15 37:9 44:25 45:12 80:10,18,19 80:20 81:1,12 82:1 85:2,4,5,8 87:1 88:21 91:9 93:12 102:15 119:17 137:8 169:12 178:25 179:2,3,19,22 180:3,10 181:11 182:2,21 183:16 184:6 offender 86:3,18 107:10 offending 79:15 120:10,14 175:16 offensive 81:8,10 172:14 offers 99:21 office 10:13,15 18:23 100:6 165:16 officer 5:8 6:9 7:7,7 8:7,9,11 13:1,2,10 14:20 15:2,23 17:3,9,23 20:21 21:1 26:24 36:3 62:3 64:1 65:1,7 92:5 102:6 107:24 112:17 113:19,24 129:21 150:16,20	150:25 153:5,7 172:20 officers 6:21 20:15 20:18 21:24 27:2 46:14,19 51:9 57:19 63:9,13 64:12 65:7,11 82:15 114:5 116:24 131:11,21 132:4 134:22 138:6,9,15 148:5 157:13 171:23 177:16 officers' 31:5 OIC 15:8,9 20:25 21:1,2,21 86:18 okay 1:17 8:19 9:22 22:25 23:16 24:2 32:5,16 44:14 73:2,23 79:19 80:5,21 82:25 83:24 84:1,18,22 91:4 92:2 93:16 95:22 96:11 99:4 100:3 101:1,13 107:17 109:12 110:16 124:21 125:22,23 135:11 135:23 136:16,19 143:4 144:6 154:8 167:1 173:1,8 184:18 old 9:17 85:3 101:24 104:8 137:5 138:13 169:2 171:6 173:22 174:1 once 49:8,11 74:22 121:24 131:3 139:1 144:10 167:19 ones 181:23 ongoing 20:3 onus 168:8 onwards 119:2	Op 143:9 158:22 open 1:14 118:21 150:6 Openshaw 50:15 147:11 operating 122:3 operation 3:9 4:9 4:11,11,18 5:11 5:14 6:1,10,11,13 6:18,22 7:4 13:2 14:13 15:8 19:10 19:10,11,15,16,19 19:20,24 20:8,22 20:23 21:5,10 22:11 23:8 24:5 24:14,15,19 25:22 26:20,23 28:15,21 28:25 30:2,3,7 36:15 37:7 38:23 39:2,22,23 40:1 40:18,20 41:17,22 45:1,13,17,24 47:2 50:12 52:20 52:20 56:12 61:2 66:15 68:23 74:16 74:17,23 79:8 95:25 96:1,2,6 112:14,15 117:7 118:4 127:10 131:5 132:22 133:22 144:16 146:1 149:16,19 151:1,10,23 153:5 154:10,16,20 155:4 171:11 173:5,6 175:19 operational 6:3 9:5 14:18 20:3 27:15 28:10 37:23 42:7 45:20 operationally 173:4 operations 19:1 20:20 21:10 38:22 42:2 50:4,5 67:14	75:22 operatives 44:4,18 opportunity 28:23 29:13 30:14 33:7 34:20 37:8,9,12 49:12,19 50:22 56:20 opposing 45:16 OPSY 44:11 options 29:3 151:16 151:23 OPUS 9:16 48:13 49:13 51:6,20 52:17 71:10,10,19 72:6,10 83:21,23 84:9 85:1,18 87:8 88:4 93:4 102:17 104:14,23 106:1 107:14 121:7,22 125:13 126:3,8,13 126:16,19 127:2 127:11,11,19,22 128:2,5,11 130:7 171:1,4 172:8,12 172:18 174:12 180:12 order 8:7 29:20 31:3,11 35:19 43:22 59:14 60:9 66:9 84:9 95:24 112:25 120:18 129:24 133:22 172:20 ordered 82:6 110:1 111:4 ordinarily 50:1 organisational 22:16 23:7,7 34:7 organised 6:4 19:17 38:10 67:17 176:1 orientate 83:19 original 28:24 69:15 108:20 originally 28:25	77:3,21 81:5 originates 168:2 ought 157:19 outlined 24:5 25:22 outset 10:22 68:22 outside 12:16 53:18 170:6 outstanding 33:4 overall 77:18 overlooked 57:13 overnight 75:24 166:12 overstated 64:17 overt 37:22 overview 8:15 74:23 overwhelming 80:19 111:25 112:12 113:2,4,5 owner 127:25
P				
P 43:1,5,7,25 pack 146:17 147:8 148:18 149:5 packages 36:21 page 4:21,24 5:9 14:6,10 15:19 23:23 25:17 26:14 27:14 28:7 29:2,3 30:10 31:24 32:1 32:10 34:12 37:15 42:12,25 43:7,11 43:13,14 44:22,22 45:3,5,5,9,23,25 57:14,15,15 79:21 79:22 81:23 82:4 83:14,25 85:4,17 85:20 86:19,21,25 87:1 88:8,15,16 89:3,17 92:8 96:13 98:5 99:8 99:16 107:10,11 108:1 110:11,14 110:22 118:14				

121:1 125:13 132:16,17,19,20 133:1,4 138:2 150:9 151:11,14 152:17,17,18 154:2 158:16 160:9,13,14,21,22 164:6 167:3 168:21 170:20 174:20,20 180:2 180:20 181:22 183:8,10,11 pages 2:9 80:17 84:4 93:10 121:14 148:17 152:10,19 152:25 paper 60:19,20 papers 112:18 parade 148:1 paragraph 41:2 72:25 97:2 164:11 paragraphs 15:21 parameter 34:24 parameters 30:20 30:24 32:25 33:8 park 109:10 parked 54:24 77:5 part 21:22 34:7,13 41:12 61:23 83:20 85:1 96:15,20,25 110:17 111:13 133:3,13 149:14 152:25 158:16 participated 156:22 particular 3:25 27:19 51:13 53:5 53:7 54:22 60:14 63:21 71:10 120:11 133:22 162:11 163:11,11 172:13,25 178:3 particularly 54:23 83:23 parts 27:1 32:23	party 49:23,24 90:8 pass 16:13 90:14 130:14 134:5,9,12 134:13 138:25 passage 139:9 164:8 passed 98:1 109:16 109:18,19 129:24 132:11 134:8,17 134:18,23 135:1 136:20,25 146:7 167:16,16 169:5 passing 136:3 168:3 password 15:11 16:25 paste 117:18 145:12,14 pasting 145:10 Paul 19:20 Pause 23:20 31:25 76:6 99:20 108:9 142:13 155:14 160:11 180:15,18 181:4 paused 82:16 pausing 6:7 PC 101:20 105:7 129:10 pecking 8:7 peers 67:20 pen 53:12 96:5,15 100:19 101:23 102:18,21 105:6 106:22 people 12:12 17:22 30:4 40:24 41:25 44:11 47:4,14 51:23 53:2 56:12 58:20 64:22 69:22 79:8 84:5 91:25 100:1 103:10 107:4 122:20 131:20,22 134:21 147:18 153:12	159:15 163:9,20 178:24 perceive 42:17,17 period 3:23 20:14 25:10 35:5 100:16 103:14 113:9 128:21 175:21 permitted 40:16 person 8:16 12:9 28:17 30:8 55:10 65:3 69:3,18 78:14,15,19 104:21 123:24 140:21 153:20,20 163:21 166:20 172:21 178:3 personal 18:9,11 44:3 72:17,18 108:21 113:15 personnel 12:11 peruse 116:9 Peter 113:19 petrol 143:2,16 phase 46:22 47:1 53:23 150:12,15 150:16,22 168:5 phone 52:10 55:3 59:22 76:5 108:22 139:4 142:17,18 142:23 phones 13:10 17:9 20:25 physical 10:11 27:20 43:4,25 54:10 physically 50:13 78:8 125:2 pick 120:21 143:10 picked 146:8,11 168:10 172:3 picture 53:12 79:17 96:5 100:19 101:23 102:18,21 105:6 106:22 piece 55:2 60:19,20	68:19 124:2,12 141:18 place 19:22 32:21 125:2 149:7 163:11 167:13,21 177:23 plainly 48:8 planned 35:22 planning 150:12,14 150:15,16,22 plans 40:25 plate 12:18 play 77:3 83:4 pleaded 88:12 please 1:4,14 2:17 3:8 4:20,21 6:4 9:3 26:13 37:14 42:12,15,15 63:3 79:14,15,21,23 82:4 83:14 84:2 89:16 92:8 94:17 96:12 99:7 100:5 100:7 106:8 108:12 118:14,22 132:16 140:20 146:17 150:2 153:25 154:1 158:16 164:2,6 168:20 180:19,20 plural 162:23 178:14 pm 61:18 94:3,5 108:13,15 184:19 PNC 49:14 51:19 51:20 79:25 89:5 89:10 104:16 118:18 119:7 120:2 125:4 126:4 126:14 127:2,24 128:17,20 129:25 130:3,7 131:8 132:23 133:5 171:1,2 172:12,19 174:11 POC 40:12,14	point 4:15 9:8 24:3 29:6 33:3,14 37:19 39:9 40:5 40:15,17,19 42:18 46:21,23 57:10 58:10,14,25 60:22 68:22,22 69:6 70:11 71:24 75:1 77:16 78:8 82:7 105:11,15 112:2 112:13,18 113:8 114:12,13 121:17 129:7 138:25 141:16,17 147:24 149:18 158:9,10 160:4 163:12 165:12 167:10,15 168:5,9 169:9 170:21 182:4,5,14 183:6,14 184:13 pointed 131:3 181:25 183:13 police 3:15,16 4:1 43:1 46:14,19 51:8 70:16 71:5 79:25 81:21 82:12 82:15 92:5 106:1 106:2 179:15 policing 9:5 133:11 policy 22:10 128:18 130:18 133:6 150:8 151:10 158:18 168:17 populate 149:24 populated 44:14,15 84:9 170:24 pose 77:21 posed 63:13 64:15 69:18 70:5 77:12 78:11 79:18 131:20,22 145:17 145:25 poses 64:9 78:20 172:21 position 60:5 109:8
--	--	---	---	--

110:3 143:9 146:12 184:4 positions 155:10 positive 86:2 95:6 95:13 97:9 positively 142:9 144:7 possess 178:17 possession 80:23 81:1,7,8 122:19 125:11 129:12 172:14 173:24 possible 43:23 61:22 62:4,11,16 63:7,14 68:18 possibly 18:7 38:2 60:24 76:10 Post 100:6 posts 45:21 165:16 potentially 42:18 44:24 45:11 63:8 64:24,25 126:11 135:3 182:15 power 83:6 PowerPoint 55:15 56:1,7,20 57:5 117:14 131:17 138:21 139:9,11 139:13,16 140:4 146:24 149:24 170:18 practice 134:25 pre-populated 44:6 precisely 20:10 predominantly 19:18 prefer 162:2 184:16 premises 161:14,17 162:17 preparation 8:12 8:14 preparatory 38:14 prepare 22:3 24:11 26:4,8 49:9 51:24	54:4 147:18,20 153:17 prepared 24:13 42:7,23 52:19 56:17,17,17 105:7 147:21 151:5 174:4 180:6 prepares 55:11 153:20,21 preparing 8:17 49:12 51:4 57:12 153:24 171:24 172:3 present 39:8 48:6 48:20 57:4 142:7 148:13,23 167:5,6 179:1 presentation 54:10 55:16 56:1,21 57:6 131:17 138:21 139:16 146:24 153:16 presented 49:8 60:15,17 63:15 64:5 65:14 118:3 132:8 149:9 152:4 154:24 155:2 156:15 163:15 178:1,10,11 182:6 presenting 150:23 151:7 177:14 presents 179:5,8 Preston 97:22,25 102:22 110:18 155:22 164:14 Preston/Kirkham 166:4 Prestwich 100:6 102:23,24 105:8 presumably 61:4 presumption 21:14 21:17,18 122:3 pretty 15:25 120:19 175:13 previous 3:24	30:10 32:7,9 45:14 72:17,24 79:14,20 80:3,23 81:12,16 83:16 125:22 142:6,12 144:1,18 158:13 163:8 166:7,13 175:17 previously 28:20 39:21 82:21 109:23 137:12 138:16 157:14 172:10 174:22 175:1,8,15 176:13 176:15,18 177:8 177:12 178:5 179:13 180:2 183:14 primarily 69:8 primary 37:9 49:16 69:1 principled 17:3 print 10:25 11:2 18:6 79:25 104:1 104:1,9 printed 11:8 18:18 99:10 104:2,10,10 108:18 128:8 159:22 printout 102:9 103:9 104:22 prior 4:13 23:10 33:22 39:22 40:7 115:5 prison 34:3 private 108:21 privy 54:20 114:11 proactive 19:3 29:12 30:3,7 131:5 probability 43:16 probably 19:12 27:8 32:5,7 41:19 44:10 51:9 54:8 67:17 72:22 76:7	78:22 83:19 85:17 86:18 90:25 91:24 100:9 107:18 121:10 122:19 136:13 139:17 146:19 152:18 160:25 161:9 177:1 procedure 35:7 167:13 proceed 133:1 proceeded 180:1 182:22 183:3 184:5,8 proceeding 47:20 proceedings 111:2 process 25:1,4 38:3 39:4 57:24 58:17 59:2,5 60:10 112:6 133:14 168:3 produce 11:4 105:15 118:7 173:4 produced 14:14 105:12 111:10 113:14 118:5 126:23 139:18 166:20,25 169:21 produces 173:7 producing 139:19 professional 66:13 67:20 134:13 profile 39:5,5 52:8 52:14 53:16,16 90:25 91:1,2 96:3 96:15,20 97:1 105:1,16,23 106:6 111:1,5,11 112:4 112:9 113:19,25 113:25 114:6,7,12 114:14,15,15 117:15 119:1 121:11,14 123:8,9 126:19,22,23	127:1,4,16 132:3 132:21 137:15 138:4 169:5,18,22 170:6 173:2 178:8 profiles 48:12 50:25 52:9,25 53:1 114:18 116:11,23 117:2,3 117:11 118:3,5,7 120:22 127:6,11 progressed 16:2,9 40:23 project 20:4 proper 27:6 properly 66:11 122:3 proportion 19:24 propose 43:22 proposing 108:25 prosecute 90:9 prosecuted 97:11 97:12,14,20 prosecution 8:17 110:20 protect 27:19 37:23 protecting 15:11 provide 48:23 57:21 59:14 66:9 provided 57:19 63:12 65:10 66:3 66:4 67:6 68:4 72:16 73:17,21 75:2 91:3 98:15 144:11 153:12 158:23 169:24 170:7 providing 23:10 49:17 59:5 65:9 67:1,13 provision 48:10,16 60:6 proximity 10:11,16 prudent 116:20 psychological 43:7 46:1
--	--	---	--	--

public 31:3 35:19 44:3,17,23 45:10 46:13,18 64:12 120:18 pulled 72:25 123:7 purely 39:3 67:23 128:5 purpose 5:5,9 26:18 42:14 56:13 141:2,4,5,8,25 purposes 110:19 116:23 152:24 pursue 97:18,19 put 15:7 22:14 27:10 35:8 36:9 47:5,15 50:16 64:11,15 66:23 88:4 96:23 97:23 99:4 100:4 102:6 105:9 110:22 113:19,19,24 117:15 121:19,20 121:22 123:21,22 132:9,13 138:2 145:23 154:1 161:6,8 170:11 173:15 174:6 181:12 182:17 183:6,18 puts 18:7 46:13 64:22 putting 47:10 108:1	63:3,25 65:8 73:22,24 76:3,17 76:21 81:14 90:21 90:23 105:16 123:18,24 127:18 134:6 135:4 136:5 136:9 144:5 157:6 161:3 172:10 174:5,7 183:5 184:1 questions 1:10,12 22:20 54:3 66:18 66:22 70:21,23 74:3 82:17 116:20 185:4 quickly 110:25 quite 18:1 20:5 92:23 124:2 138:11 164:4 168:18 181:25	46:15 55:22 56:5 56:7,8 75:7,8,18 98:14 103:4,7 108:11 115:14 139:8 146:25 147:6 148:4,25 155:12 159:22,25 160:15,24 161:22 163:1 164:8 165:1 165:8 166:15 168:13,14 181:10 reading 16:7 32:16 75:11 77:23 175:10,11 178:23 real 124:8 136:2,2 realise 65:9 66:3,25 really 20:16 33:10 34:2 39:24 53:5 69:4 104:8 135:6 136:3 137:19,20 173:21 reason 17:3,15,16 17:19 28:24 30:2 36:13 39:2 40:9 52:4 78:10 82:16 90:13 115:3 124:18 139:6 162:8,11 166:14 173:3,4 reasons 17:6 90:2 receive 63:23 145:19 received 4:13 14:15 23:22 24:14 28:22 53:9,10 60:13 64:8 68:1,15 102:18,20 106:6 154:18 receiving 68:8 recognise 83:19 recognition 12:18 recollection 72:17 72:18,23 74:14 105:5 144:6 record 71:6 80:1,4	83:23 84:10 85:1 89:5,10 102:17 118:18 119:7 125:13 127:2,2 137:8 140:22 142:8 151:21 153:1 180:12 recorded 85:13 111:15 133:18,20 142:23 146:21 170:16 recording 5:10 14:15 42:20 records 48:13 49:13 71:10 120:2 138:23 recovery 28:3 recycle 166:18 recycling 170:12 171:6 red 106:24 redact 109:1 redaction 108:24 reduced 68:4 182:21 refer 36:4 72:21 103:21 169:9 reference 31:16 69:18 82:5 88:20 89:2,6 92:16 102:21 107:11 108:1 115:22 118:16 152:7 155:15 156:18 159:25 160:8 161:3 169:11 180:20 referred 9:12 12:13 12:23 27:16 55:14 74:24 100:19 105:7,13 106:25 175:18 referring 55:25 79:5 96:16,21 113:1 115:15	116:15 170:20 refers 28:6 53:12 96:18 174:9,17 reflected 57:22 reflection 29:2 refresh 132:15 refuses 90:8 regard 54:13 67:16 68:6,11 69:11,13 73:12 82:24 135:5 135:23 155:2 159:16 regardless 176:7 region 154:11 regular 15:24 regulatory 60:9 rehashed 138:7,7 relate 17:8 87:22 87:22 88:6 90:22 118:11 172:13 174:15 related 75:1,21 85:14 87:19,25 96:6 119:21 134:22 156:13 relates 41:22 52:18 89:5 92:3 94:25 relating 75:22 82:1 relation 19:14,17 20:23 22:10 24:14 24:22,24 28:22,25 29:12 31:17 32:4 32:20 46:24 48:3 48:11 54:23 55:4 58:3 64:2 66:18 67:14 68:14,25 74:4,16,25 75:3 75:24 76:15 88:9 89:10 90:20,22,24 102:7 103:16 104:18,24 114:10 118:3 120:10 121:11 131:25 132:3 133:18 136:22 139:7,23
<hr/> Q <hr/> Q9 177:2 qualification 67:19 67:22 qualified 64:24 65:25 quality 135:16 question 16:22 22:22 26:7 31:20 33:10,16 47:9 52:6 54:2 55:7 56:13 62:19,23	<hr/> R <hr/> R 98:5 race 32:4 Rachel 53:12 104:4 111:10 126:25 175:17 178:7 radio 55:2 141:18 raise 47:8,11,13 170:14 182:14 raised 6:19 146:16 165:4,20,21,24 raises 7:17 raising 6:23,24 7:2 7:14 60:22 rammed 81:21 range 50:6 120:10 rank 3:10 rapid 173:11 rate 77:20 78:8 rationale 105:2 130:1,3 135:12,14 135:16 reactive 19:6 read 16:10 40:12			

142:3,11 145:6 148:14 152:6,7 156:12,12 158:10 159:13,14 162:9 163:1,8 166:8 170:21 174:7 177:23 179:1,3 183:15 relative 155:10 relatively 128:15 relevance 22:25 23:3 90:19 162:12 163:10 172:5 relevant 9:20,23 10:10 31:19 34:24 51:21,22 62:7,8 73:13,17 77:16,17 126:25 135:4 139:22,22 145:5 145:16,24 172:4 173:9 reliable 60:25 61:3 61:22 62:4,11,16 63:7,14 130:16 relied 48:23 132:11 133:21 rely 40:24 122:5 remain 3:12 113:25 remained 135:19 remember 54:8 71:7 83:3 103:21 104:25 105:18,19 113:7 124:5 140:9 143:22 147:13 149:12 155:9 160:9 183:1 repeated 183:11 replaced 9:17 reply 7:7 report 2:19,21,23 14:7 17:17 72:25 88:2 99:10 102:3 107:9 165:17 reports 2:16 3:4 48:14 71:18,20,25	159:3 180:3 request 2:16 requests 6:12 require 173:14 required 37:22 58:12 rescinded 76:1 166:8 research 12:17 49:2,7,20,21 50:23 51:2 52:21 130:4 132:2,5 169:13 183:15,17 183:21 researched 117:24 124:16,19 resource 26:21 resources 24:18 respect 37:8 47:22 79:13 111:3 132:23 respond 17:11 19:7 responding 19:9 response 63:21 responsibilities 6:8 6:16 8:9 12:15 13:7 171:15 responsibility 8:22 11:24 13:14,18 21:21 47:22 48:3 48:9,10,16,20 49:16 55:8 57:16 57:17 58:2,16 147:16,17 153:11 167:25 171:9,14 182:7 responsible 6:9,20 6:23 7:14,16 8:11 8:25 13:8,11 59:2 59:5 155:22 156:6 164:13 172:2 restricted 151:3 restructure 38:8 40:22 result 4:12 9:23	13:25 33:19 82:15 resulted 7:5 122:8 resume 184:15 retained 133:5 retention 128:16 130:3 retired 32:14 return 109:5 153:25 returned 143:2,17 reveal 31:6 revealed 110:7 reverse 95:24 reversed 82:11 review 22:16 23:7,7 34:7 122:1 reviewed 108:24 128:1 riddled 54:14 right 1:12 4:25 5:3 5:16 10:15,22 21:5 22:4 23:14 27:12 30:19 31:24 32:6 35:18 36:6 38:23 41:1,25 42:8 43:19,23 49:16 53:15 57:14 63:1 69:15,21 72:11 73:2 74:1 74:11 76:21 80:9 81:8 82:6,8 86:20 87:6 89:1,6,7 91:2 92:23 93:3,9 96:16 97:21 98:20 98:22 99:13 100:22 101:16 106:17 107:10,16 109:4 112:20 113:21 125:19 138:13,24 143:18 160:4,21 164:4 166:23 167:7 168:5 169:7 172:18 180:6 181:2 184:15	right-hand 43:21 rightly 181:25 Rimmer 75:2 77:13 78:2 98:25 114:18 156:6,12,22 158:24 159:18 163:24 Rimmer's 114:15 120:22 ring 138:19 ringing 74:16 rise 107:23 108:5 risk 28:16 32:21 33:3,21 42:7,16 42:18,21 43:13,13 43:23 44:3,23 45:10,19,19,24 46:1,5,23 64:12 64:15,23 69:2,17 69:18,19,23 70:1 70:2,5,6,21 73:16 74:2,4 76:13,22 77:13,18,22,25 78:3,16,17,19 133:13 139:24 158:10 risks 43:7,11,14 Road 143:8 rob 34:18 35:1 100:16 101:9,10 103:13 robber 161:11 robberies 95:1,25 96:7 97:4 137:13 138:17 154:11 174:24 175:1,9 176:3,13,19,25 177:3,18,20 178:5 178:19 robbery 3:17,19,23 3:25 4:1,6 7:20 8:1 9:10 19:5,7,13 19:22 20:16,19 28:14,21 29:1 35:22 36:16 37:7	38:15 39:25 40:1 45:14 81:16 92:4 93:19,22 94:15,22 94:25 95:1 96:19 97:21,24 99:6,6 99:10 100:6,24 102:22,24 105:8 107:8 109:23 111:7 112:22 155:22 156:7,22 157:14 159:5 161:10 162:15 163:1 164:13 166:5 176:16 178:11,15 179:19 Robert 1:4,5 114:15 156:12,22 163:24 185:3 rogue 82:5 118:16 role 6:14,17,18 17:8 18:16 21:1,2 21:23 33:23 38:13 54:24 76:19,24 145:22 167:17 roles 38:13 70:9 150:10 171:14 roll 140:20 Romeo 122:21,23 129:13 room 147:19,20,21 147:25 149:8 156:1 158:5,6,7 164:19 rooms 51:4 148:1 Ross 93:6 135:22 round 20:6,24 22:9 58:14 64:19 route 158:3 row 47:11 run 181:19 running 19:11 38:17 Russ 39:17
<hr/> S <hr/>				

S 106:15,16	176:2,17,18 177:9	104:17,23 113:10	101:9	shortly 116:7
safety 110:20	182:18,19	114:17 117:12,14	September 1:24	shot 65:3
129:22	scale 43:17 91:7	119:1,7,14,21	2:21	shotgun 111:4
Salford 19:18	scan 8:13 9:19	124:16,21 125:24	sergeant 6:5 24:22	155:25 156:7,23
31:23 32:21 42:4	15:23	128:7 136:25	48:22 129:11	164:18
Sandringham	scanned 9:13	140:12,16 141:19	series 1:15 95:1	shout 157:15
143:8	scanning 8:22 9:1	142:1,10,14,22	serious 27:23 28:11	show 4:20 90:7
sat 10:15 41:14	9:24	147:8 149:5,8	29:13,14,15,18,19	95:12 102:6,9
51:7 55:1 120:14	scenario 31:15	150:7,9 151:11	30:11,15,21,25	139:2
138:22 147:24,25	scenarios 37:5	154:9 157:24	31:2 33:2,9,18	showing 90:4
163:4 165:12,13	scheme 90:18	158:14,18 159:8	38:10 67:17	107:14
177:25	score 43:16,18,18	164:11 170:9,10	156:20,25 157:4,9	shown 55:22 86:11
satisfied 58:19	scoring 42:21	179:24 181:23	157:16,24 181:16	102:1,2 107:17,18
68:12 73:16	screen 83:20 84:2	seeing 36:21 113:3	182:10	153:4
130:15	84:15,25 147:10	seek 28:3	seriousness 33:17	shows 86:17 103:15
Saturday 140:18	167:18	seen 40:2 51:5 57:5	served 4:1 141:8	127:19,22 139:1
save 20:16 42:11	second 28:10 31:19	57:12 71:7 102:11	service 3:15,24	side 41:14,14 81:20
saw 102:21 146:6	43:4,25 47:9,12	104:7 112:13,18	services 58:12	96:23 147:21
149:11	58:2 94:22 97:2	113:13 126:20	servicing 3:14	150:3
sawn-off 111:3	100:10 108:5	127:2,24 134:16	set 15:11,12 17:2	sighting 162:10
saying 10:9 12:2	141:22 152:12	134:19 146:10	18:9,19 27:18	163:6
30:14 41:19,21	160:13 164:1,11	147:14,15 148:17	43:21 148:17	signal 121:21,24
55:23 57:17,20	165:25 166:24	165:19,21 168:17	setting 6:10	123:5,12
64:17 65:23,23	section 31:3 35:19	171:24 183:12	seven 27:9 75:11	signals 104:16,23
69:17,20 72:2,3	41:10 87:11,16,16	seized 28:23	87:15 100:1	122:12,17 133:9
75:6 82:22 101:21	87:22 88:6 89:18	selects 61:7,7	SFC 65:18	133:13 135:10
133:16 141:2	93:12,12 120:17	send 41:22 115:6	SFO 177:18	signed 7:9
143:6,20 144:12	121:12 123:16	115:11 116:11	SFOs 169:7	significant 48:9
152:9,24 157:5	151:12 169:12	sending 42:4	shaking 47:10	64:7 67:2 70:1
161:24 162:4,24	179:21,24 181:11	senior 5:7 6:9	share 20:24	146:4
168:24 172:18	181:14 182:2,12	26:24 36:3 134:22	shared 17:12	signpost 41:17
178:25 179:13	182:21 183:9	sense 173:18	Sharon 93:6	silver 59:12 60:7,13
says 15:22 16:11	184:5,6	sensitive 5:10 14:19	Shire 3:9 4:9,11,12	60:18 61:4
24:4 25:21 29:9	see 5:20 7:15 9:20	73:8	4:18 14:13 19:24	silvers 59:18
30:18 44:2 74:12	11:11 14:8 16:15	sent 57:25 71:16	20:8 21:5 22:11	similar 86:22
91:9 95:14 97:1	21:13 24:3 27:14	106:5 115:19	36:15 38:23 41:17	Similarly 5:18
103:20 110:23	29:2 32:3 40:10	161:1 168:15	41:22 50:12 52:20	84:23
111:14,23 119:4	44:14,20 48:15	sentence 31:9 33:19	74:16,17,23 117:7	Simon 37:21 38:24
121:5 123:20	52:17 56:20 68:8	34:20 35:2,15	132:22 133:22	39:7
134:10 140:16	79:25 80:17 81:23	37:11 155:17	158:22	single 37:19 39:9
142:2 150:10	86:21,22,24 87:10	183:25	shoot 63:22	40:5,17,18
154:7 156:8	87:13,21 88:8,15	sentenced 88:12	shooting 92:5	SIO 5:7 6:5,6,8,15
157:10 158:21	89:16,22 90:10	sentences 16:10	short 18:14 34:25	14:20,20 15:2,2
161:3,10 162:14	91:9 94:22 95:2	183:24	61:17 108:14	51:16 57:17,24
162:18 163:7	98:17 99:18 100:9	separate 45:17 46:6	152:18	60:7,12 104:20

158:23	somebody 15:12	73:18	56:11 150:13,14	Stoke-on-Trent
SIOs 167:9	18:11 27:9 30:25	speak 22:19 27:2	stages 82:25	58:9 68:24
sir 1:9 2:15 7:21	31:7 34:3 36:5	32:15 74:8,20	stamped 11:5,6	stolen 58:9 77:3,10
14:21 15:7 16:7,7	38:7 39:12 42:5	138:9 142:15	18:2,5 114:24	158:11 159:7
17:25 22:21,25	61:11 62:19 70:1	179:16	stand 1:9 29:25	stood 75:25
23:3,15,18 24:3	85:18 86:8 87:8	speaking 67:20,20	128:14 136:24	stopping 84:8
24:12 25:25 26:12	90:5,7 121:19,19	73:8 152:23	standard 123:18	store 18:22
26:17 29:6,11	126:11 129:5,9,11	specialist 173:13,17	168:17	straight 31:1 58:15
31:24 33:11 35:3	135:16 145:14	specialists 118:8	stands 5:7 25:24	117:15
45:7 46:6,8,10	149:13 153:17	specific 48:12	106:23	strands 53:10
47:13,16,19 54:13	166:18 170:5	128:5 152:4	start 3:8 4:18 5:18	126:6
61:13,19,23 79:22	171:20 173:19	156:18 159:25	6:1 26:3 32:8	strategic 59:8
82:7 92:3 94:1,7	177:13 179:18	161:21	38:23,24 40:2,18	65:16 140:1
106:7 107:22	182:16	specifically 33:15	41:1 42:1,25 74:1	150:11
108:11,16 134:11	somebody's 97:17	71:22 72:1 105:9	79:20,23 117:7	strategies 6:10
142:1,16 144:5,14	sorry 2:24 3:1,19	specifics 47:21	138:24 140:9	strategy 27:7 29:4
145:9,12 148:21	7:1,6,13 10:15	spectrum 120:13	141:3 146:19	29:7 33:2 37:15
149:3 151:24	14:21 21:16 23:24	130:5 172:9,17,19	148:2 184:16	streamlined 60:24
154:24 155:1,16	29:6,11 31:24	172:22	started 5:14 22:10	60:25
156:8 157:5,21,23	32:9 33:3 40:13	spent 139:20	26:1 28:25 38:16	street 18:14 30:9
158:3 164:4 165:4	45:8 47:4,8 48:1	spliff 122:22	38:23 39:25 66:16	strong 156:1
165:9 172:10	49:5 50:17 53:24	split 75:22	74:23 83:25	164:19 177:18
175:10 184:11,17	55:23 58:6,13	SPOC 38:6 39:11	147:13	Stuart 91:13 92:4,6
sit 1:7 10:2 57:7,14	62:25 64:17 69:14	39:11,15,16 40:11	starting 42:5 57:10	107:7 110:2,6
148:3,6	70:13 72:10 76:20	40:25	117:6	111:10
sits 1:12 121:16	79:13,22 81:8	spoke 24:21 74:7	starts 24:1 59:3	subheading 29:4
130:6,6 172:23	82:5 83:15 96:17	74:13,21 76:3	80:7 83:15 121:3	79:20
sitting 138:11	96:21,24 99:24	152:5	statement 1:18,23	subject 29:12 30:5
situation 36:11	102:24 104:18	spoken 24:23 39:18	2:1,5,7,9 14:1,2,6	34:19 37:10 46:14
situations 35:21	105:12,19 107:9	74:18,22 88:7	15:18 130:16	50:25 52:8 64:8
six 2:13 3:21 74:25	107:11 109:16	staff 21:9,11 25:13	146:9 177:17	64:14 68:25 69:1
75:11,12,13,14,18	110:9,12,14 116:3	35:10 38:21 40:23	statements 1:15	79:3,6,8,10
87:15 91:9 107:4	118:15,16 122:10	45:19 49:1,7,8,9	2:13 14:2,5 70:15	119:23 123:21
178:24	125:18 127:21	55:3 57:12 58:19	static 25:11	127:15 132:12,21
skill 148:11	129:2 130:7	106:4 139:15	station 4:2 143:2	133:5 161:16
skills 20:24 149:23	135:21 140:12,15	140:2 144:10	143:17	162:16,18,23
171:17	141:17 142:1,21	148:10 149:22,23	status 85:20 86:17	168:25 169:21
slides 57:8,9	145:8 151:5,18	155:23 159:6	86:22 90:4 95:14	170:6 172:16
slightly 39:19 54:9	152:12,15 154:4	161:18,19 163:4	stayed 128:20	178:8
106:7,10	162:6 181:3	164:17 165:15,16	stems 64:4	subject's 63:24
small 12:20 17:21	sort 108:22	169:14 171:10,13	stepped 142:17	subjective 61:9
143:2,16	sound 167:19	173:7	143:24 144:2,7	subjects 9:21 27:21
snapshot 53:4,11	source 168:6	staffing 6:12,13	stepping 140:24	27:24 28:3,6,6,12
53:23	sources 70:25 71:5	stage 3:10,11 6:7	steps 146:14 157:19	28:24 30:11 36:13
SOI 5:3,4	72:3,9 73:5,8,13	8:12 34:16,16	stick 14:23	36:15,18,24 44:4

44:18,25 45:12,16 46:5,13,19 49:11 54:19 56:25 58:18 63:13 67:15 70:4 75:21,23 77:9 100:15 117:8,12 118:4 127:10 145:6,16,25 147:5 149:16 154:9,20 155:4,21 156:1,5 156:8 157:10,11 157:13 158:22 159:5,11,18 162:1 162:2 163:13,14 163:19 164:13,19 subjects' 168:19 submission 25:4 submissions 59:11 submits 25:6 submitting 25:1 subsequently 15:15 85:13 114:4 subsided 75:25 substantial 156:2 164:20 substantiated 83:13 substantive 34:19 35:14 100:23 subtopic 93:24 successful 30:6 39:24 suffice 165:19 sufficiency 90:10 sufficient 37:3 68:12 90:7 95:8 suggest 34:24 45:15 61:8 78:6 89:25 91:17 97:20 155:18,21 161:8 164:12 170:25 173:2 176:20,21 suggested 36:17 64:18 178:24 suggestion 87:3	132:9 suggests 16:5 32:18 58:24 80:25 156:21 175:8 summary 80:13,14 84:5 102:15 112:13,19 113:3 113:13 summonsed 86:13 86:14 Sunday 108:18 superintendent 25:2,2,7,7 32:4,13 32:14 52:12 144:15,24 166:3,6 supervising 6:21 supervisor 39:17 97:17 supplement 59:24 60:21 supply 36:18 supplying 36:24 support 6:13 34:17 supported 159:2 supports 161:22 suppose 12:7 51:23 52:5 63:17 66:1 118:9 sure 11:12 18:8 41:25 44:8 47:14 47:14 61:25 75:17 82:14 85:4,9 89:22 94:19 98:4 107:25 166:24 167:8 169:19 surrounding 3:9 surveillance 19:4 22:14 23:11 24:23 25:16 27:6 31:4,5 31:7 36:19,20 45:20 49:22,25 53:8,17,20 55:2,4 58:11 60:20 66:17 72:12 77:8 114:11 122:14 141:20	154:16 suspect 47:21 60:11 75:7,8,16 76:7 78:24 79:2 85:25 86:1 90:7 91:24 180:5,7 suspected 91:10,13 91:17,22 suspicion 86:3 172:9,22 175:15 176:24 suspicious 176:6 suspicious 146:13 sworn 1:5 185:3 system 6:20 7:1,2 7:11,11 9:2,6,7,16 9:17,18,19 18:6 42:21 57:24 72:6 85:3,3 88:4 101:25 102:12 103:7,8 104:8,12 105:3 106:15 121:18,18,22,24 121:25 122:2,5,21 126:13 127:19,22 130:12 133:18 134:1,2,4,8,18 135:11,13,17 137:5 182:17 183:20 systems 8:13,23,25 15:24	table 10:3,4 tabs 128:4 TAC 57:3,22 151:6 151:6,8,9 152:24 153:9,16,22 172:1 tactical 29:3 47:24 48:7 50:7 56:24 57:21 58:21 59:1 59:6,12 61:10,21 61:24 63:6,16 65:14 66:4 69:9 71:21 74:1 114:9 115:24 116:8 132:5 134:7,14,24 137:22 138:6 139:14,21,25 144:24 148:9 149:19 150:13 151:9,16,22 153:9 156:15,17 158:17 162:8 168:4 tactically 173:3 tactics 6:10 26:21 28:18 29:23,24 30:7 31:10 50:6,8 66:1 139:24 140:3 172:4 173:10 take 10:24 19:25 27:3 29:21 30:1 32:23 43:22 50:1 63:2 64:6,21,22 65:3,12 66:5 67:2 67:9 71:25 76:24 82:25 95:9 105:10 116:16 128:4 133:17 139:4 148:4 150:6 177:23 180:14 taken 18:12 19:22 21:9,12,25 29:24 32:21 33:5 62:7 71:19 97:16 132:3 146:14 157:19 161:2 167:9 172:15 182:19	takes 24:16 61:4 167:13 Talbot 8:8 10:3 12:21 13:4,18,19 14:3 15:13,23 16:5,17 17:13 24:24 39:1 98:11 163:5 talk 9:25 10:10 81:18 117:7 137:18 talking 12:11 14:22 31:2 36:8 47:7,17 49:3 62:14 65:18 70:12 72:8,8 82:19 101:8 115:22 120:16 121:12 122:10 126:18 137:24 144:4 145:10 160:6 173:13 180:11,25 181:6 talks 31:11 tall 169:2 tape 170:16 target 36:15 targeting 29:12 targets 45:24 tasking 38:3 tea 10:17 team 6:3 7:3 9:9 10:6,16 12:19 13:4 14:18 28:21 31:4,7 37:23 39:25 40:2 49:25 53:20,21,22 54:3 56:12 57:10 58:11 71:8,16 72:14 79:9 85:18 87:8 114:6 123:4,10 133:23 134:24 136:25 138:1 144:11 171:10,13 171:16 teams 10:1,19
T				
TA 150:15 TA's 150:8 tab 1:14,16,23 2:1 2:5,7,9,17,21,23 3:2 14:6,8 15:19 110:10,14 128:5 132:16,16 140:11 140:14 150:6 154:3,5 164:1,3,4 167:2 168:21 170:15 174:19,20				

28:20 122:14 141:20 177:23 technical 25:15 tell 4:9 5:5 6:3 19:15 23:16 26:18 42:14 71:22 75:13 95:11 122:17 136:24 141:23 159:20 169:7 173:19 telling 22:23 24:12 61:5 102:20 119:23 157:12 tells 127:24 template 44:2 59:14 60:6 ten 108:11 tend 20:24 21:2 27:12 34:24 89:25 tended 36:4 78:6 tensions 31:22 32:5 terms 4:9 6:12 19:24 20:7,9 26:18 30:1 36:21 38:13,21 42:16 47:7,17 48:12,25 53:8,14 54:10 60:1,2,22 66:12 66:24 70:9 77:17 78:3 80:6 97:23 117:5 122:24 124:25 125:1 126:11 139:23 146:25 148:11 153:20 169:10 171:17 173:10,15 178:23 179:2 182:15,17 183:8 testing 54:9 TFC 50:2 55:9 63:18 64:5 65:9 66:9 68:4 69:12 70:10,18 116:12 123:23 124:3 127:18 151:6,7	153:17,23 159:24 169:13,24 172:1,1 TFCs 48:21 TFU 48:5 51:1 90:14 114:3,18 132:11 134:18 142:2,19,24 143:13 thank 3:7 45:7 47:16 61:19 89:14 94:1,2,7 99:3 108:16 109:7,9 116:3,5 132:18 149:4 184:15,17 theft 45:14 80:20 85:11 theirs 161:7,10 thereabouts 102:14 103:14 115:23 they'd 147:21 thing 10:18,20 22:8 30:19 37:11 48:15 51:9 55:20,24 56:18 59:3 77:7 81:18 104:8 121:21 171:25 183:10 things 21:19 22:3,6 23:13,16 24:10 26:4,8 36:8 42:11 47:7,17,24 55:14 55:25 82:18 90:18 93:17 108:22 136:11 137:25 165:14,18 think 2:10,16 4:17 4:24 7:15,21,25 8:22 9:4,15 10:3 12:12,13 14:1,2,6 14:7 18:12 19:10 19:18,23 21:8,13 21:18 22:3,22,23 23:25 25:11 27:6 27:7 29:9 31:16 34:7 35:6 37:6,10	38:20,25 40:20 42:7 44:2,10 49:6 50:3,11,13 52:10 52:25 54:2 55:23 56:15 58:10,18 59:17,25 60:22 61:1 63:20 68:1 69:4,11,17 70:14 71:4,18 72:18,18 73:25 74:7,10,17 75:6,10 76:3,3,9 76:13,19,24 77:1 77:7,12,21 80:6 80:17 81:3,4,5,14 81:20,23 82:5,9 85:18 86:5,21,24 87:15 89:5 90:24 91:24 93:13 95:5 95:24 96:15,18 98:17 99:10,13,18 99:21 100:1,9,13 101:19,22,24 102:11 103:6,13 106:7,13,24,25 108:18 112:13,14 112:17,18 114:17 114:23 115:18,19 115:23 119:7,15 120:2 121:10 122:12,24 123:20 123:22 126:10,15 128:3,5,15 130:14 132:9 134:11 136:8,9 138:18 140:10 141:14 142:14 144:1,5 145:4,13 146:9 150:7 151:6 152:23 154:13,22 154:25 156:16 158:17 159:15,17 160:9,12 166:22 168:16,24 170:8 170:15 171:13,25 172:12 174:1,11	178:4 179:13 180:4,25 181:19 182:11 thinking 16:3 33:15 52:14 65:5 66:24 thinks 178:3 third 43:7 110:23 140:20 thought 9:23 13:19 29:15 30:16 40:12 40:14 70:9 76:15 76:21 79:12 101:19 106:22 112:20 thoughts 105:10 threat 31:15 33:22 35:20,23 36:11 47:25 48:5,17,24 61:21 62:2,10,14 63:5,13,24 64:8 64:11,15 67:13 68:14,17 70:24 78:11,20 79:17 131:20,21 145:6 145:11,16,24 146:5,6 147:4 172:21 threatened 159:7 threats 46:2 three 20:25 44:16 47:24 54:2 75:13 88:12,25 93:17 114:18 117:12 136:14 141:15 145:6 157:13,14 158:22,24 173:20 177:1 threshold 128:16 128:18,19,23 129:1,3,4,8,16,20 129:24 167:15,20 tidy 108:5 115:25 tied 155:25 161:18 164:18	tight 17:20 till 102:13 time 1:7,9 3:25 8:3 9:2,10,15,16,21 11:5,6 18:7,14 19:2,25 20:5,7,11 20:12,14,23 21:3 21:4,6,19,22 23:6 23:9 34:20 35:5 36:1 37:6 38:7,20 40:15 42:11,18 53:5,7 57:7,9 59:25 60:1,1 63:2 66:16,17 68:8,20 69:2 72:4 74:10 75:22 76:5 83:4 99:5 100:4,17 105:22 113:9 114:24,25 115:1 115:13 117:8 118:21 123:1 124:14 128:21 131:1,6 135:24 137:16 138:2,22 139:20 140:9,17 142:18,22 145:4 145:15 147:13 149:11 157:18 163:4 165:24 175:21 177:2 178:3 181:13,13 184:11 timed 142:19 times 15:25 50:12 50:19 57:11 72:22 124:9 129:10 141:11 147:21 165:10 title 118:9 titles 80:11 today 47:20 104:9 told 13:24 39:10 60:19 66:17 74:18 91:25 93:23 107:4 131:13,14,21,23
---	---	---	--	--

137:11 138:15 159:10,12,20 166:6 169:19 177:3,16 Tolly 12:22,23 tomorrow 47:21 54:9 75:16 109:1 109:3,3,5 111:21 113:11 175:20 184:16 top 5:3 45:9 110:22 145:5 168:21 174:20 181:16 topic 58:2 109:5 toss 174:15 total 48:9 totality 85:15 totting 35:6 Totton 12:24 19:20 19:21 28:8 35:5 69:1,1,2,8 70:5 75:1 76:14,22 77:22 78:1 97:5 98:23,24 114:19 120:21 122:16 123:8 132:3 137:15 138:5 156:6,14 158:24 159:13,18 163:13 163:16,21 173:2 Totton's 96:20,25 114:14 120:25 123:9 traditional 5:21 train 65:7 trained 44:11 50:8 65:2,6,8 173:17 training 44:9,12 48:1,2 61:23 67:12,16 68:1,6 68:11 148:11 171:16 transactions 36:21 transcript 40:12 138:23 167:2	170:17 transpired 40:20 transpires 13:21 travelling 58:9 115:12 Travers 97:6 treat 33:12 trial 100:17 111:7 111:19 tried 33:12 100:13 101:3 135:10 136:13 true 2:14 3:4 trust 17:24,25 truth 111:18 143:22 try 20:6 33:16 58:15 79:17 80:3 118:18 138:20 170:14 trying 22:20 32:24 38:18 58:14 62:18 84:14 85:6 86:5 114:13 115:21 158:4 168:9 169:9 177:6 182:7,14 TSB 97:21 Tuesday 1:1 tune 70:20 turn 5:9 65:10 70:25 81:18 89:15 93:22 94:14 95:24 97:21 136:15 142:21 154:21 179:2 turned 140:7 173:23 twice 131:3 165:6 165:21 168:12,13 168:14,14 183:12 two 15:21 28:6 50:14 55:14,25 69:22 75:13 77:3 87:11,22 88:6,21 109:20 135:25	156:5 160:18 163:19,22 182:12 182:20 183:9 184:6 TWOC 88:22 type 4:7 17:7 173:7 typed 176:11 types 19:14 37:5 typing 11:24	123:3 124:10 unfair 21:18 64:2 unfortunately 37:1 unhelpful 132:10 unit 3:18,19,23 4:1 4:1,6,7 7:20,23,25 8:1 9:5,8,11 11:18 11:20,23 12:7 19:13 20:19 24:20 33:23 35:11 38:15 40:24 41:8 47:25 50:11 67:23 115:24 116:8 132:5 138:6 139:15 140:2 149:23,24 170:7 171:19 173:13,17 units 50:7 unknowns 163:18 163:22 unproven 179:5,8 unreliable 64:20 unsubstantiated 93:11,18 94:11,14 176:6,23 unusual 39:19 update 13:16 16:14 54:18 56:16 74:19 141:21 142:3,11 142:24 143:15 144:9 updated 34:10 86:18 103:12 updates 55:4 102:6 use 22:15,16 24:19 30:8 31:5 37:16 45:14,21 50:9 59:14 65:15 79:9 80:23 81:2,7,12 82:1 89:15 94:12 97:8 106:3,4 116:22 117:1 172:5 175:16 177:19 usher 4:20	V
		U		
		subject 162:21 Uganda 18:13 ultimately 8:16 10:7 31:8 unaltered 114:1 unarmed 58:19 173:6,9 underestimated 64:11 underlines 124:8 underlying 104:24 130:17 underneath 8:6 78:6 understand 9:25 22:24 23:1 32:24 33:10 55:9,13 69:12 84:14 100:15 101:5,8 109:7 120:2 129:6 129:8 136:1 154:19 158:3 172:21 understanding 50:24 52:7,25 69:5 87:9,19 94:25 110:2 113:8 understands 160:17 understood 13:19 59:17 128:15 129:3 Undetected 86:17 undue 122:13,15	vagaries 148:3 value 177:4 182:19 variety 73:5 90:2 126:6 various 57:11 97:4 165:17 vary 19:25 20:2 vehicle 45:14 78:25 82:11,12 83:1,4,6 158:11 vehicles 25:14,15 54:23 55:4,5,6 58:9 77:2,3,10 81:21 82:13,14,20 85:12 141:21,23 142:11 verbalised 176:11 verbatim 56:8,10 VI 136:1 victim 90:8 Victor 117:22 119:4 video 124:22,23 136:22 view 77:12 113:15 violence 78:21 81:13 82:1 83:13 89:12,16 94:12 117:22 119:17 124:20,21,24 125:3 137:8,13 138:17 174:24 175:2,9 178:6,20 180:10 violent 121:6,7 123:5,12 137:10 Visited 143:2,16 vital 37:16 volume 150:2,6 154:1,2 164:1,3,4 170:15 174:19 volunteered 18:15 VTD 142:5 Vulture 112:15,16	

175:19	169:22 172:8,13	121:22 128:20	world 67:17	years 3:16 7:22
<hr/> W <hr/>	174:7,8	130:12 143:1,15	worse 177:9	27:9 123:2,2
W 106:8 115:25	wash 165:11	147:10 162:8	worthy 78:19	134:15 137:5
W/79 116:4	167:23	weren't 77:15	wouldn't 20:18	143:23 157:14
wait 155:23 164:16	wasn't 10:15 15:14	131:13,15 145:25	30:8 39:11 49:21	<hr/> Z <hr/>
180:16	22:7 24:12 26:11	167:5	57:7 62:17 67:3	<hr/> 0 <hr/>
waited 147:24	50:8 59:16 67:21	whilst 18:15 49:12	70:19 71:25 87:24	03.15 32:6
148:1 161:17	68:24 81:25 82:3	74:6 82:10 88:9	88:1 90:19 91:3	04773 92:13
waiting 102:8	95:7 106:24	88:24 115:22	104:2,10,20,20	09.10 32:12
141:19,20	114:16 124:12	160:18	110:6 115:8 118:9	<hr/> 1 <hr/>
want 15:18 31:5	137:2 147:16	Whisky 117:22	120:13 121:9	1 1:14,16 14:6
42:1,4 52:22	163:18 175:21	white 169:2	124:20 126:14	26:14 27:14,19
78:15 79:17 80:11	waste 157:18	wholly 173:12	128:19 130:4	29:9 98:2,7
94:14 102:9	watch 124:23	wide 120:10	139:19 140:23,24	114:20 150:10
115:25 120:13	watered 176:22	wider 172:19	140:24 147:15	154:2 158:19
121:9 122:7 124:7	way 5:21 16:7 20:6	winding 138:11	148:6 149:14,23	167:2 174:19
129:23 130:4,16	22:9,14 29:25	wish 11:4	171:19,20 173:18	183:10 185:3,4
135:4 137:20,24	34:22 40:2,3	wished 116:9	177:5,21,22	1.00 93:23 94:3
141:23 142:21	47:15 50:16 66:14	witness 1:15,18,23	179:10 183:17,22	149:6
144:12 149:21	68:23 74:2 77:2	2:1,5,7,9,13 52:1	wounding 92:10	10 2:1,23 20:12
157:6 160:3,4	84:17,19 98:18	110:13 150:2	181:15 182:25	25:21 31:23 41:2
wanted 12:8 27:10	99:1,19 145:23	154:2 160:13	write 34:22 44:20	42:15 89:4
38:21 47:13 49:14	151:4 175:10,11	witnessed 31:4	159:17	10.30 1:2 26:17
81:18 84:12	179:15	witnesses 47:15	writing 11:24 68:5	184:16,17,20
wants 149:20	ways 64:19 179:17	wonder 31:18	written 5:3 27:6	100 32:10 62:13
warning 52:18	We're 154:5	61:13 96:12 99:7	59:17 68:9 134:16	1085 4:21,22 5:12
104:16,23 117:13	we've 167:11	107:22	134:19 160:18,20	1096 5:18,22 24:1
117:19,21,24	weapon 83:2 121:6	Woodchuck 21:10	160:22 161:25	1097 5:24 25:17
119:4,9 120:3,23	128:12 172:15,24	word 48:2 56:8,8	162:5,7,13,25	11 3:2,2 14:6,8 98:5
121:6,17,21,24	weapons 81:2,7,8	56:10,10 68:9	168:11,12,14	144:20 145:1
122:12,17 123:5	81:10 82:17,20	worded 28:13	wrong 15:4,6,7	11.45 115:23
123:12 125:16,24	117:22 121:7	177:7,11 179:7	16:5 40:16 45:2	11.56 61:16
126:3,8,16 127:3	125:4,9,11,16,24	words 33:1 70:5,19	108:4 146:14	11.57 116:6
127:20,23 128:3	169:3,8,10,16,22	103:21 129:4	164:23 165:1	12 19:12 67:18
128:10,16 131:15	170:6 171:3	168:19	177:5 182:1,8	94:18,23 108:18
131:16 132:10	172:13,23 173:21	work 4:16 18:14	wrongly 101:20	153:6
133:9,12,24	174:8,15 177:16	19:13 20:3,20,23	wrote 2:16	12.05 61:15
134:17,23,25	week 13:24,25	42:5,6 64:19	<hr/> X <hr/>	12.10 61:18
135:7,10 136:11	weeks 20:10,11	66:21 88:5 118:8	X 27:7 185:2	12.30 115:3,13
170:6 171:2	177:2	122:2 163:3	X7 140:21 168:24	160:20
172:23,24 173:21	welcome 1:7	worked 38:3	174:19 181:10	1217 32:10,11,12
174:3 177:15	went 7:25 18:13	working 6:22 19:1	<hr/> Y <hr/>	1220 32:1
warnings 123:17	19:12 25:3 49:6	21:15,17,19 41:20	Y 27:7	1267 146:24
123:19 169:3,8,16	72:24 78:14	122:4 138:6 146:1	year 37:11 136:16	
	100:17 111:19	149:13		

1268 147:5	154:1 160:13,13	25 2:19 58:8 69:4	335 168:20,22	169:2
1269 147:5	160:13 164:9	72:22	174:20,20	6.00 55:20 56:5
1270 147:5	2.05 93:25 94:5	25th 70:11	34 170:15	6.45 163:4
13 99:11	2.28 108:13	26 123:7 131:24	35-year 169:2	
14 1:1 19:12 110:18	2.43 108:15	137:22 170:9,15	369 158:16,18	<hr/> 7 <hr/>
123:2 140:11,14	20 85:7 87:11,16,16	170:16 180:7	160:22	7 1:24 2:21 44:22
154:3,5 167:2	87:22 93:12	181:12	375V 152:10	45:5,9 92:11,23
168:21 174:19,20	169:12 179:21,24	26th 50:18 138:1	377 110:11,15	106:5,14,17
1400 99:8	181:11,14 182:2	170:18	3Ps 42:23,25	110:10,14 119:2
1406 99:23	182:21 184:6	28 80:17 94:18,23	3rd 26:2 131:12	182:25
1411 99:16	2000 91:10,14 99:6	2917 152:11	139:3,17 143:6	7.00 52:12 74:7
1412 99:14	99:11	2925 151:11 160:21	147:9 152:6 165:7	144:25 166:4
15 3:16 22:5 24:7,9	2001 102:13	2926 151:25 152:1	<hr/> 4 <hr/>	7.05 74:8,12 76:11
26:6,16,17 34:10	2002 92:11,23	152:17	4 2:5 19:11 81:20	144:18 166:4
85:11,14 88:16,25	102:13 135:20	2927 152:17	83:8 87:17,20	7.14 98:9
137:5	182:25	2945 151:16,19	88:6,10 119:5,11	7.15 163:7
15-year 138:13	2005 97:22,25	2951 151:21	120:17 123:16	7.30 76:11
157497H01 92:17	161:4,5	2975 151:18	182:13	7.35 76:11
162:11 164:1,3,4	2006 94:18,23	2987 152:11	4.30 184:11	704 83:25 125:13
173:19	95:25 96:7 97:3	2nd 52:12 131:12	4.31 184:19	125:17,20
18 93:12 169:12	112:23	165:6 166:4	40 57:8 152:25	72 15:19
179:21 181:11,14	2008 135:20 155:22	<hr/> 3 <hr/>	43 75:10	727 83:14,17 85:20
182:2 184:5	156:6 159:6 161:4	3 2:1 4:12 5:12,22	44 121:1	86:25 87:10 89:16
19.14 76:7	161:6,8,12 162:15	5:24 19:19,20	449 164:6	92:14 93:10 94:20
1985 175:19	164:13	24:4 25:19 27:16	45 115:18,19	180:25
1995 96:22 100:6	2009 44:10	28:3 50:11,20	46 121:5,14	728 84:3
105:8 107:8	2010 19:23 44:10	51:12 57:15	47 89:18 121:14	729 84:3
109:10 112:16,22	19:2	110:23 113:16	48 121:14	73 132:19,20
131:8	2012 1:19,24 2:19	123:11 133:23	<hr/> 5 <hr/>	730 84:3
1996 3:16	2:21,23,25 19:2	138:12 140:18	5 2:7,7 29:3 31:3	733 83:15 125:21
1996/1997 111:7	31:24 34:10 50:11	146:22 147:1	35:19	737 84:23 86:21
1997 81:20 83:8	96:1 98:9 103:22	154:1 168:25	5.00 55:20 56:5	87:1 89:22 91:5
87:11,17,20 88:6	104:1,3 113:16	170:15 183:11	140:10	92:8 93:10 181:6
88:10 119:5,10	146:22 150:10	3.25 161:13,16	5.30 147:12	181:8
122:25 124:10	154:1 158:19	162:16	5.45 147:12	74 132:16,17 133:4
131:8 136:17	2013 2:1,5 3:2	30 1:19 57:8 80:17	5.57 140:17	75 153:6
179:25 182:11,13	2014 2:7,11 110:18	89:20,23 152:10	50 20:11 57:8	757 79:23 82:4
1999 4:4 89:20,23	2017 1:1 108:18	152:25	54 96:13 97:2	759 118:14 119:7
1st 156:16 160:21	20s 88:6 182:12	30-year 173:22	5x5 11:2 18:3 41:16	125:5,19
<hr/> 2 <hr/>	183:9	174:1	5x5s 11:25	763 100:9 107:12
2 1:23 27:23 29:3	21 2:5 137:2	329 170:20	<hr/> 6 <hr/>	108:2
37:15 45:5 57:15	23 2:10 91:10	332 154:2,5	6 2:9 15:19 42:12	766 79:21 80:6
121:12 148:18,22	232 154:4	333 154:7 155:19	42:25 132:16,16	771 81:23 82:9 88:8
149:5 150:2,6	24 2:9	167:3	<hr/> 8 <hr/>	88:16

82:17 43:7,11
80 34:5,12

9

9 2:21,23,25 43:13
43:14 107:8
112:22 182:11,20
90 122:20
975 118:15