

1 Wednesday, 15 February 2017
 2 (10.30 am)
 3 THE CHAIRMAN: Thank you Mr Beer.
 4 MR BEER: Thank you.
 5 MR ROBERT COUSEN (continued)
 6 Questions from MR BEER (continued)
 7 MR BEER: Mr Beer, we were dealing with the briefing on
 8 3 March of the AFOs at Openshaw, early in the morning,
 9 5.57 onwards.
 10 We had gone through a number of the parts of the
 11 briefing, and looked at whether the information given to
 12 the officers was accurate or not.
 13 **A. Yes.**
 14 Q. If we can open up your first volume, please, and just
 15 carry on with the process, please.
 16 **A. Okay.**
 17 Q. At tab 14, page 333.
 18 **A. Yes.**
 19 Q. Just something which I didn't ask yesterday, the very
 20 first part of the briefing starting with, "Okay folks",
 21 from Superintendent Granby, where pretty much the first
 22 thing he says is:
 23 "There is intelligence to suggest that these
 24 subjects were responsible for a robbery in 2008, in
 25 Preston ..."

Page 1

1 Which we looked at yesterday to see the inaccuracies
 2 within it.
 3 **A. Yes.**
 4 Q. This was new information, wasn't it, that had not been
 5 included on any previous briefings?
 6 **A. In terms of the comments on the actual slide or in terms**
 7 **of -- what we are talking about here, sir?**
 8 Q. Either, on the slides or the oral briefing.
 9 **A. I think it is the same information, because I have had**
 10 **a chance to look at the previous briefings. It is the**
 11 **same information that was on the previous briefings.**
 12 Q. Which previous briefings?
 13 **A. The briefing on 2 March.**
 14 Q. Right. And?
 15 **A. And possibly on some of the earlier briefings. I would**
 16 **have to have a look at them.**
 17 Q. I thought you had only received this on 1 March by the
 18 email from --
 19 **A. Sorry, yes, I thought you was then talking about this --**
 20 **the first bit, about being engaged in armed robberies in**
 21 **the north-west region.**
 22 Q. No, I read from the sentence:
 23 "There is intelligence to suggest that these
 24 subjects were responsible for robberies in 2008, in
 25 Preston."

Page 2

1 **A. Sorry, sir, that is my misunderstanding. Yes, that had**
 2 **only been on the second of -- that is the first time**
 3 **that would have appeared.**
 4 Q. Because you had not known about it before then?
 5 **A. No.**
 6 Q. It was only as a result of the hacksaw incident --
 7 **A. Yes, these emails.**
 8 Q. -- that it came forward --
 9 **A. Yes.**
 10 Q. -- in your consciousness, effectively?
 11 **A. Yes.**
 12 Q. Okay. So this mention in a firearms briefing about the
 13 incident in Preston, in 2008, as it is put here, it
 14 follows that this was introduced as a result of what you
 15 had said to Chief Inspector Lawler and Inspector Fitton,
 16 back on 1 March?
 17 **A. Yes, that's correct.**
 18 Q. So it is not -- unlike some of the other information in
 19 the briefing -- from a previous briefing prepared
 20 in January or February, which has been recycled and used
 21 again?
 22 **A. No, that is new information.**
 23 Q. Okay, and it originates from you?
 24 **A. Yes, it does.**
 25 Q. Thank you.

Page 3

1 Can we turn, then, to where we left off with the
 2 rest of the briefing, please, at page 335.
 3 We had read in relation to Mr Grainger the first
 4 three parts of information given about him, which was:
 5 (1) He has warnings for weapons; 2) He had previously
 6 conspired to commit robberies with firearms and
 7 violence, and (3) He had numerous arrests for section 18
 8 and section 20 offences.
 9 **A. Yes.**
 10 Q. Which is where I was going to turn last night, so the
 11 fourth thing that is said about him:
 12 "He is a Group 1 offender."
 13 **A. Yes.**
 14 Q. What is a Group 1 offender?
 15 **A. I think it is somebody, a persistent offender on**
 16 **a division, on a division which would have been -- when**
 17 **he was living in and around Salford, it would have been**
 18 **the Salford division. Any other division -- it is so**
 19 **the division can monitor the intelligence on that**
 20 **person. They may have some kind of intervention plans**
 21 **in terms of that person.**
 22 Q. So it can be any crime, it is just persistency that is
 23 the issue, is it?
 24 **A. Yes.**
 25 Q. Can I just look in bundle A, please, at page 87.

Page 4

<p>1 A. Yes. 2 Q. This is part of X7's statement, and it is X7 who is 3 actually saying this in the briefing. 4 A. Okay. 5 Q. He says, when he is talking about the briefing, about 6 eight lines in: 7 "The capabilities section of the threat assessment 8 identifies two officers, why he has the VI mark. It is 9 not necessary for him to be convicted of an offence. 10 I did not personally conduct research into any of the 11 subjects of this operation. MOPI, the management of 12 police information, divides nominal records into four 13 groups. Group 1 are the most dangerous offenders, 14 sexual offenders and violent offenders." 15 A. Yes. 16 Q. Do you see, X7 here appears to suggest that Group 1 17 refers to dangerousness? 18 A. Yes. 19 Q. That they are the most dangerous, and it is sexual 20 offenders and violent offenders? 21 A. I do see what you are saying, sir, yes. 22 Q. Do you think that is more likely to be right than your 23 understanding that it is about persistency and it can be 24 any crime? 25 A. That may well be correct, sir.</p> <p style="text-align: center;">Page 5</p>	<p>1 actually processes that information. 2 Q. But you would agree that what we looked at yesterday 3 would not justify the description of Mr Grainger as 4 amongst the most dangerous offenders? 5 A. I would agree. Based on his convictions, I would agree, 6 yes. 7 Q. I think that is all that is said about his threat; is 8 that right? 9 A. As I understand, sir, yes. 10 Q. If we just look back a page, where J18 is speaking, you 11 can see, at the bottom of the page, he says: 12 "Subjects have access to a stolen red Audi A6 13 displaying a vehicle registration mark [this is bottom 14 of 333] LO08 LOD." 15 Of course, that is wrong, isn't it? 16 A. It is wrong, and yesterday we were talking about whether 17 I would have picked things up or whether I wouldn't have 18 picked things up. That registration number was 19 absolutely emblazoned on my mind, and I can just give 20 you a brief explanation. 21 It was RO08 LOD, was the correct registration, and 22 the reason why I remembered it so clearly is, well, I am 23 a big Man City fan and when that vehicle first came into 24 being, the RO0, automatically for me, I linked it to 25 Rooney, who is a Manchester United player, who are</p> <p style="text-align: center;">Page 7</p>
<p>1 Q. Thank you. We can put file A away. 2 Does it follow that you, hearing this on 3 March, 3 would not have taken anything in particular from you 4 being told that Mr Grainger was a Group 1 offender, 5 about his dangerousness? 6 A. I personally wouldn't have done, sir, no. 7 Q. If it does -- as the person saying the words thought it 8 did -- mean that he was a dangerous offender, in 9 particular because of offences of violence or sexual 10 offences that he had committed, that wouldn't apply to 11 Mr Grainger, would it? 12 A. On the basis of the questions that I was asked 13 yesterday, and I think we went through in quite a bit of 14 detail, then no, if it was based on convictions. 15 Q. Right. 16 So if he is a Group 1 offender means what X7 thought 17 it meant, that would be wrong too? 18 A. If it is a Group 1 offender and it is automatically put 19 on to the OPUS system, then that may be something that 20 is automatically generated as a result of the arrest. 21 I can't honestly give you the answer in terms of why 22 that would automatically be generated on there, but 23 I suspect that is what the case would be. 24 Q. But Mr Grainger's history -- 25 A. I see where you are coming from, it is how the system</p> <p style="text-align: center;">Page 6</p>	<p>1 obviously an opposing team to Man City. That's just the 2 way that I remembered it. It wasn't ROO, it was RO08. 3 Q. So, this should be Romeo, rather than Lima; yes? 4 A. Yes, it should be. 5 Q. We know that had shown up twice because the same mistake 6 had been made on the earlier briefing, the one given by 7 Chief Inspector Lawler. 8 A. Yes. 9 Q. Yes. 10 A. Yes. 11 Q. Are you saying, effectively, that shows the extent to 12 which you were paying attention to the detail? 13 A. Well, the point I am saying is I did try and explain, 14 I did have other demands on me. So if I had not seen 15 that, which would have been glaring to me, something 16 that I had been looking at, the vehicle, for the past 17 six, seven weeks, or however long it was, I would have 18 raised it there and then. And I would have said, "Can 19 I just make the teams aware the registration number is 20 RO08 LOD", not -- 21 Q. Because that is quite an important piece of information. 22 A. It is an important piece of information. 23 Q. For the 16 firearms officers to know the correct 24 registration of the target vehicle. 25 A. Yes. I am just flicking through, sir, because I am not</p> <p style="text-align: center;">Page 8</p>

1 **sure if it is mentioned later on, where it is the**
 2 **correct registration number.**
 3 Q. I don't think it is. I think we know that the officers
 4 all took down the incorrect number, because when they
 5 subsequently made their witness statements, they all
 6 gave the incorrect registration number of the vehicle.
 7 **A. Also, I don't know if this is something that you are**
 8 **going to come back to in terms of -- because that has**
 9 **come from, obviously, the briefing on the 1st. I don't**
 10 **know if that is something we are going to come back to**
 11 **today, sir.**
 12 Q. As I said, I have looked and the same mistake is made in
 13 that briefing, and the mistake I think originates in the
 14 PowerPoint.
 15 **A. Could I just look through, could I look through the**
 16 **actual --**
 17 Q. Exactly, the rest of it, yes.
 18 **A. Just bear with me one second.**
 19 Q. It goes right up to 347.
 20 **A. Okay, thank you.**
 21 **Sir, on page 336, just after halfway down.**
 22 Q. Yes.
 23 **A. Seven lines up from the bottom.**
 24 Q. The correct one is given.
 25 **A. Yes.**

Page 9

1 Q. Romeo Oscar. So are you saying you didn't pick up on
 2 the first one?
 3 **A. The point being is I've not -- if I would have picked up**
 4 **on it, then clearly I would have said that.**
 5 Q. Just looking over the page, after 333 --
 6 **A. Yes.**
 7 Q. -- we can see that J18 says:
 8 "Subjects have access to stolen red Audi [then that
 9 mark] this vehicle is currently parked in Boothtown.
 10 And that's ..."
 11 Then somebody says, "That's correct, yeah."
 12 Then he continues:
 13 "The case at the moment."
 14 And somebody says:
 15 "Yeah."
 16 Do you think that was you?
 17 **A. Possibly.**
 18 Q. Would anyone else have known whether the car was picked
 19 up as still being in Boothtown, at that time?
 20 **A. Yes, because I had met up with Mr Granby in the morning,**
 21 **I don't know 5.30, 5.40. So he had been updated at that**
 22 **point. So it may well say that in his log, I don't**
 23 **know.**
 24 Q. You cannot tell from, obviously, this transcript whether
 25 this was you saying, "That's correct", and, "Yeah", can

Page 10

1 you?
 2 **A. I would have thought it would have had my initials --**
 3 **they would have put my initials through it if it was me.**
 4 Q. They don't always do that in the preparation of this
 5 transcript. If you look at 347, for example.
 6 **A. All right.**
 7 Q. At 347, at 16.59, somebody says:
 8 "N18, can I just raise, before we finish, these --
 9 obviously, we know one vehicle."
 10 I think that is you speaking there, having listened
 11 to the recording of it, it is plainly you and they
 12 haven't written your name alongside it.
 13 **A. Yes.**
 14 Q. So if we listen to the recording, we might be able to
 15 tell whether you were saying, on 334, that the
 16 information about the Audi still being in Boothtown is
 17 correct at the moment, is you or not?
 18 **A. Yes.**
 19 Q. Yes, okay.
 20 Did you explain to Superintendent Granby before this
 21 briefing, so that he could explain to the AFOs what
 22 Mr Grainger's anticipated role in the likely offence was
 23 to be?
 24 **A. Yes, about him being the driver.**
 25 Q. When did you tell him that?

Page 11

1 **A. Well, I had had a conversation with him on the Friday**
 2 **night and it would have been during the course of that**
 3 **conversation.**
 4 Q. The 7.00 pm or 7.05?
 5 **A. Yes. Yes.**
 6 Q. Because it was in the course of that that you said he is
 7 likely to be the driver?
 8 **A. Yes.**
 9 Q. Was that on the basis that surveillance had previously
 10 picked up Mr Grainger as being the driver?
 11 **A. Well, he had the car at that point, so that is why**
 12 **I believed it to be him.**
 13 Q. What do you mean, "he had the car"?
 14 **A. In terms of the stolen Audi, it was -- or he had the**
 15 **keys to the Audi.**
 16 Q. Do you know whether the firearms officers were ever made
 17 aware of that, to your knowledge?
 18 **A. I don't know, sir.**
 19 Q. I think in the course of the briefing, they are not.
 20 **A. Yes.**
 21 Q. Did you hear them told at any other stage who would be
 22 likely to adopt which role in the alleged offending?
 23 **A. I have not personally heard that, no, sir.**
 24 Q. Would you expect that kind of thing to be passed on?
 25 **A. Well, different briefings are different. It is --**

Page 12

1 obviously, when I gave the -- give the information, the
 2 intelligence, I will go into kind of War and Peace, but
 3 the briefing is -- as it says, it is brief, so it is
 4 a briefing.
 5 Q. Why did you tell Mr Granby that it was anticipated that
 6 Mr Grainger would be the driver?
 7 **A. Because it was relative to the fact that he had -- or**
 8 **I suspected he had the keys to the vehicle. He had**
 9 **certainly been moving the vehicle around. He had been**
 10 **the person who had been driving on the majority of**
 11 **occasions.**
 12 Q. So, in summary, looking at the briefing as a whole,
 13 insofar as it related to Mr Grainger --
 14 **A. Yes.**
 15 Q. -- we looked at page 333 yesterday. There are five
 16 pieces of information that relate to him.
 17 **A. Yes.**
 18 Q. The first of them is at page 333, about the robbery in
 19 Preston.
 20 **A. Yes.**
 21 Q. I think you accepted yesterday that this was an error,
 22 insofar as it related to Mr Grainger?
 23 **A. It related to one of the subjects, not to these**
 24 **subjects. That's correct.**
 25 Q. So the officers were mistakenly briefed about that?

Page 13

1 **A. That's correct.**
 2 Q. The second piece of information relating to Mr Grainger
 3 is on page 335. He has warnings for weapons. I think
 4 we know that he hadn't been arrested for having
 5 a weapon, that he had no convictions for having
 6 a weapon. We haven't seen any entries on intelligence
 7 records relating to weapons, there was no warning
 8 markers on the PNC relating to weapons and no warning
 9 marker for weapons was included by PC Griffiths in her
 10 subject profile. We cannot establish why there was
 11 a warning marker on OPUS; is that the position?
 12 **A. We cannot establish why the warning signal was on there**
 13 **for weapons, but you have also got to take into**
 14 **consideration that when the vehicle had been seen -- had**
 15 **been parked up by Anthony, that the sledgehammer, that**
 16 **was on the second day of reconnaissance in**
 17 **Stoke-on-Trent. So, in due course, clearly we never got**
 18 **to that stage but, at the conclusion of the operation,**
 19 **when we were no longer proactive, then that is**
 20 **something -- one of the responsibilities that**
 21 **Andrew Talbot would have had to have done.**
 22 **So, in essence, I respect completely what you are**
 23 **saying in relation to the warning marker for the weapon**
 24 **at the time, but I think it is also right to say that**
 25 **the sledgehammer that had been seen, on 26 January, that**

Page 14

1 **would have been placed on to the intelligence system by**
 2 **Andrew Talbot, and then when it comes to the weeding of**
 3 **the markers, that would have been the rationale behind**
 4 **that.**
 5 Q. I am not going to probe all of these things in any
 6 detail. We have your evidence on them.
 7 The third is that he has previously conspired to
 8 commit robberies with firearms and violence, and I think
 9 you disagreed with my suggestion yesterday that this was
 10 being presented as an established fact?
 11 **A. I did disagree with it. I think it is the wording --**
 12 Q. Do you accept that it is capable of being interpreted as
 13 meaning it is established fact that he has previously
 14 conspired?
 15 **A. Clearly, because you have interpreted it that way, sir.**
 16 Q. I know but I might be an outlier who adopt a wholly
 17 unreasonable interpretation of things.
 18 **A. In which case, you would be better asking a team of**
 19 **firearms officers because --**
 20 Q. I am just asking you, do you think --
 21 **A. In my opinion -- but, then again, I am looking at it**
 22 **from a police perspective, so I wouldn't automatically**
 23 **think that that related to somebody being convicted,**
 24 **because if it was convicted, then I would have expected**
 25 **it to say:**

Page 15

1 **"He has been convicted of ..."**
 2 Q. I mean, asking a team of firearms officers might not be
 3 the best group of people to ask. They might have
 4 a vested interest in the answer, wouldn't they?
 5 Particularly when one of them has shot somebody and they
 6 have died.
 7 **A. From my perspective, all I can say is if it was me**
 8 **receiving that, if it said, "Convicted", then I would**
 9 **expect it to be convicted. If it didn't say that, then**
 10 **I would not assume.**
 11 Q. The fourth piece of information is that he had been
 12 arrested on numerous occasions, or there are numerous
 13 arrests for section 18 and 20 offences.
 14 **A. Yes.**
 15 Q. I think we have established that that is
 16 an overstatement of the position.
 17 **A. Yes, I think I said yesterday it should have said,**
 18 **"A number of arrests" -- or "Several arrests", I think,**
 19 **actually.**
 20 Q. One for each.
 21 Fifthly, it says he is a Group 1 offender. I think
 22 we have established this morning that if that is meant
 23 to mean he is amongst the most dangerous offenders, then
 24 that is an exaggeration.
 25 **A. It's -- in terms of convictions, yes.**

Page 16

<p>1 Q. Would you say that, looking at these things together, 2 that an exaggerated picture of Mr Grainger's threat was 3 presented to the firearms officers? 4 A. That wouldn't be my perspective, but ... 5 Q. It was completely accurate? 6 A. No, you have just gone through, sir, so it is clearly 7 not completely accurate. 8 Q. The inaccuracies tend to exaggerate his risk, rather 9 than to minimise it, don't they? 10 A. They certainly don't minimise it, sir. 11 Q. They exaggerate it, don't they? 12 A. Well, that would be your word, sir. 13 Q. I am asking you. They exaggerate his risk, don't they? 14 A. I am not saying that it exaggerates his risk. 15 Q. Why not? 16 A. Because -- 17 Q. They either minimise it, they get it right or they 18 exaggerate it, don't they? 19 A. It is inaccurate. 20 Q. And the inaccuracies have the effect of exaggerating his 21 risk, don't they? 22 A. Sir, I am not saying -- I am saying it is inaccurate. 23 Q. Really? You don't -- 24 A. Sir, that is what my answer is. 25 Q. Okay, well, the chairman has it.</p> <p style="text-align: center;">Page 17</p>	<p>1 15 deployments on Mr Totton, Mr Rimmer and -- well, none 2 on Anthony because we never deployed surveillance on 3 Anthony. 4 Q. But irrespective of who the deployment was on, the 5 surveillance that then happened did not pick up the 6 Corkovics coming into contact with Messrs Totton, 7 Grainger or Rimmer. 8 A. No, it didn't, but it would also be fair to say that the 9 times that we spent on the Corkovics, which was -- there 10 was a substantial amount, but it wasn't wholly on them. 11 We didn't have a lot of coverage on them over afternoon 12 periods, and I needed to make the assessment once -- it 13 was David Totton, once he had been housed, or we knew 14 roughly where he was living, which was the January time. 15 Q. 23 January, I think. 16 A. Yes, I think it might be slightly earlier, but it was 17 certainly January. 18 Q. In fact I think it was the 13th, when he came back from 19 Thailand and he went to a new address that you didn't 20 know about. 21 A. He went to a block of flats, yes. 22 So I needed to make the assessment over -- well, it 23 was probably, what, a four or five week period of time 24 and that is when I made the assessment? 25 Q. So you were satisfied to the requisite degree of</p> <p style="text-align: center;">Page 19</p>
<p>1 You split the operation in two, I think, on 2 22 February 2012; is that right? 3 A. Yes. 4 Q. It was initially believed, or suspected, that the 5 Corkovics and David Totton may be working together. 6 A. Yes. 7 Q. But, on the 22nd, you effectively develop the operation 8 into two strands. 9 A. Yes. 10 Q. You made a note in your casebook saying this was 11 because: 12 "We have never witnessed the Corkovics associating 13 with David Totton. I am now treating these as two 14 different aspects of the operation." 15 A. That's correct. 16 Q. Now, by that time there had been, I think, quite 17 a substantial amount of surveillance; is that right? By 18 22 February. 19 A. On the whole Shire or just -- 20 Q. Yes, the whole. 21 A. There had been on the whole of Shire, yes. 22 Q. And Messrs Grainger, Totton and Rimmer had not been 23 associating -- or seen associating with the Corkovics 24 once; is that right? 25 A. Yes, but I think by that time we had probably only had</p> <p style="text-align: center;">Page 18</p>	<p>1 probability for the purposes of your operational 2 decision making, that the surveillance had given 3 sufficient coverage to be able to exclude, as a working 4 hypothesis, that these two groups of people were working 5 together? 6 A. That's correct. 7 Q. After 22 February, is it right that you didn't brief any 8 Firearms Units about the Corkovics? 9 A. That's correct. 10 Q. Is that -- 11 A. Sorry, what date was that? 12 Q. After 22 February. 13 A. No, I think on the first briefing, because at that time, 14 on the very first deployment, we actually thought the 15 vehicles, the stolen vehicles, were in the control of 16 the Corkovics. So the briefing on the 26th -- it would 17 have been the briefing on the 25th and the deployment on 18 the 26th. 19 Q. Of January? 20 A. Of January. 21 Q. That is not after the 22 February, is it? 22 A. Sorry, sir. 23 Q. You have confused yourself? 24 A. Yes. 25 Q. After you split them on 22 February --</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 A. After we split, there was never any briefings on the --</p> <p>2 Q. Because I know that on 25th and 26th you did brief up</p> <p>3 jointly, effectively?</p> <p>4 A. Sorry, sir, my misunderstanding.</p> <p>5 Q. That's all right.</p> <p>6 That was because, certainly by the start</p> <p>7 of March 2012, the intelligence relating to the</p> <p>8 Corkovics wasn't relevant to the risk, if any, that</p> <p>9 Mr Totton, Mr Grainger and Mr Rimmer posed.</p> <p>10 A. That's correct.</p> <p>11 Q. In particular, it was not relevant to the assessment of</p> <p>12 the threat that Mr Grainger posed.</p> <p>13 A. Yes.</p> <p>14 Q. The intelligence that had been received that the</p> <p>15 Corkovics had access to, or possessed, firearms was not</p> <p>16 relevant to Mr Grainger's threat?</p> <p>17 A. No.</p> <p>18 Q. I think you said in the past that had you suggested to</p> <p>19 firearms officers that specific intelligence relating to</p> <p>20 the Corkovics would have been relevant to Mr Grainger,</p> <p>21 it would have been wholly misleading and completely</p> <p>22 inappropriate was your phraseology; yes?</p> <p>23 A. Yes.</p> <p>24 Q. Was Mr Granby given access to the intelligence</p> <p>25 chronology by you?</p> <p style="text-align: center;">Page 21</p>	<p>1 A. Sorry, whereabouts is this, sir?</p> <p>2 Q. Just -- I am so sorry.</p> <p>3 A. Is it page 77?</p> <p>4 (Pause)</p> <p>5 Q. Just forgive me a moment whilst I sort out my pages.</p> <p>6 (Pause)</p> <p>7 Yes, page 77, page 7 of 24.</p> <p>8 Let's do it by reference to the volume I am looking</p> <p>9 at. Bundle H, please. Bundle H, page 26.</p> <p>10 A. Yes.</p> <p>11 Q. Do you have some words in italics at the top, "The CPS</p> <p>12 allege ... "?</p> <p>13 A. Yes.</p> <p>14 Q. Then you start speaking or giving evidence --</p> <p>15 A. Yes.</p> <p>16 Q. -- under the chronology, and you say:</p> <p>17 "The chronology gave me a wider view and concept of</p> <p>18 the OCG we were dealing with on one operation. It is my</p> <p>19 professional experience that there was a fluidity of</p> <p>20 movement between members of the OCGs in the planning</p> <p>21 required. The TFC has a duty to assess those risks and</p> <p>22 threat posed to the public ... My assessment of the type</p> <p>23 of offence of subjects ..."</p> <p>24 Then you continue.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 23</p>
<p>1 A. Not by me.</p> <p>2 Q. Just look, please, at bundle H.</p> <p>3 A. Yes.</p> <p>4 Q. In fact, we can do it a different way. Your first</p> <p>5 volume of witness statements --</p> <p>6 A. Yes.</p> <p>7 Q. -- tab 6.</p> <p>8 A. Yes.</p> <p>9 Q. Page 26.</p> <p>10 A. Sorry, which tab is it?</p> <p>11 Q. Tab 6.</p> <p>12 A. The page number?</p> <p>13 Q. It is different page numbering at the top.</p> <p>14 THE CHAIRMAN: Ours start --</p> <p>15 MR BEER: Page 5 of 26, or page 75, at the top right.</p> <p>16 THE CHAIRMAN: Yes.</p> <p>17 A. Okay.</p> <p>18 MR BEER: Do you have that?</p> <p>19 A. Yes.</p> <p>20 Q. This is part of your long witness statement prepared in</p> <p>21 the course of the defence of Sir Peter?</p> <p>22 A. Yes.</p> <p>23 Q. You say:</p> <p>24 "The chronology gave me a wider view and concept of</p> <p>25 the OCG."</p> <p style="text-align: center;">Page 22</p>	<p>1 Q. Sorry, yes, Mr Granby's statement, hence my confusion,</p> <p>2 not you.</p> <p>3 A. Okay.</p> <p>4 Q. Then, at the foot of the second hole-punch, he says:</p> <p>5 "I had access to a hard copy of the intelligence</p> <p>6 chronology."</p> <p>7 Can you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Did you give him that directly? Sorry, that can be put</p> <p>10 away now, after that.</p> <p>11 A. No, I didn't.</p> <p>12 Q. Why didn't you give him a copy of the intelligence</p> <p>13 chronology?</p> <p>14 A. Because, the night previous, I had actually spoken to</p> <p>15 him about the -- I think it was six intelligence logs</p> <p>16 that referred to Totton, Rimmer and Anthony.</p> <p>17 So, I didn't feel the need that I had to then</p> <p>18 present him with that document.</p> <p>19 Q. Had you read them out to him, verbatim?</p> <p>20 A. I can't say I read them out verbatim, but I certainly</p> <p>21 had them and I will have given him a summary of what</p> <p>22 they were.</p> <p>23 Q. Did he say, "I have already got what you are reading</p> <p>24 from or what you are telling me because Mike Lawler has</p> <p>25 given it to me"?</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 A. No, but I think he got it later, anyway. When I spoke 2 to him, I think he got it after that. 3 Q. Does it follow that the version that he saw included all 4 of the information about the Corkovics? 5 A. It did, because the chronology -- 6 Q. Didn't distinguish between them? 7 A. No. 8 Q. When you spoke to Superintendent Granby, on the evening 9 of the 2nd, did you make it clear that the intelligence 10 about the Corkovics was not relevant to Messrs Grainger, 11 Totton and Rimmer? 12 A. I never mentioned the Corkovics to him that night. 13 Q. Do you know whether he was given any instruction, may be 14 putting it too high because he was a senior officer, but 15 any indication or suggestion that, "Look, there is this 16 thing called an intelligence chronology that Mike Lawler 17 has got, he might be giving you a copy, but there is 18 quite a lot of stuff on there about the Corkovics' 19 activities, including their possession of firearms, 20 don't have regard to any of that?" 21 A. No, I didn't know he had it. Well, he wouldn't have had 22 it when I spoke to him, so no. 23 Q. Did there come a time when you knew that he had it? 24 A. Well, it was well after the event. 25 Q. So after Mr Grainger was shot?</p> <p style="text-align: center;">Page 25</p>	<p>1 Q. No, he doesn't. It only sits behind the copy of 2 Mr Lawler's. 3 A. Right. 4 Q. You had emailed it to him, I think, to Mr Lawler, hadn't 5 you? 6 A. I had, yes. 7 Q. Did you impose any conditions on what was to be done 8 with it? Because it is quite a sensitive document, 9 isn't it? 10 A. It is, and it is marked "sensitive" at the top, and 11 I think in bold red it actually says, "Not to be 12 forwarded, copied, printed ..." 13 Q. In fact, you did forward it, didn't you? 14 A. I did forward it. It was relevant to forward it because 15 he was the tactical firearms commander. 16 Q. So, when it says, "Not to be forwarded", what does that 17 mean, then? 18 A. Meaning, once I have passed it on to somebody, or if 19 DS Hurst had passed it on to somebody -- 20 Q. They are not then to send it on? 21 A. They are not then to send it on. 22 Q. It looks like that in fact is what happened here, that 23 they sent it on to Mr Granby. 24 A. Yes, it looks that that's what's happened. 25 Q. Okay.</p> <p style="text-align: center;">Page 27</p>
<p>1 A. Yes. 2 Q. So you are effectively saying that you didn't tell him 3 to not have regard to the Corkovic intelligence because 4 you only told him about intelligence relating to 5 Messrs Totton, Grainger and Rimmer? 6 A. Yes, that is the only people who we was briefing up on, 7 so if he has had the chronology document there, which -- 8 I have just seen his line there to say that he has 9 reviewed it -- well, he said he has review it had during 10 3 March and he was given it at 5.20 am on 3 March. 11 Q. So the next morning by Mr Lawler? 12 A. Well, Mr Lawler would not have been there to be able to 13 give it to him. 14 Q. To hand it over. 15 A. I certainly don't remember giving it to him. Whether or 16 not it was on the log that had been completed by 17 Mr Lawler, I don't know, but ... 18 Q. Certainly, in the photocopy of the log, Mr Lawler's log 19 that we have, sitting behind it, is a copy of the 20 intelligence chronology and sitting behind that, 21 I think, is a copy of his PowerPoint presentation with 22 his handwritten notes on it. So that is certainly 23 a possibility. 24 A. Can I just ask: does Mr Granby have it attached to his 25 as well? Has it been photocopied or --</p> <p style="text-align: center;">Page 26</p>	<p>1 In your report, if we look at your volume, at 2 tab 11. 3 A. Sorry, volume 1? 4 Q. Volume 1, yes, please, at tab 11. It is a report that 5 you wrote for the IPCC, dated 11 January. 6 A. Yes. 7 Q. When you are dealing with the intelligence chronology. 8 A. Yes. 9 Q. You say, in the fourth line: 10 "This is a sensitive document that was only accessed 11 by me as the SIO, the Deputy SIO and the OIC." 12 And we dealt with the OIC point yesterday, and we 13 know that is not right. 14 A. Yes. 15 Q. "The document was provided to silver cadres but only 16 intelligence that related to specific subjects would be 17 referred to." 18 A. Yes. 19 Q. So you are saying there it would be provided to silver 20 cadres because by then you knew that somehow it had 21 reached Mr Granby; is that right? 22 A. Whether or not I have seen it on the morning of the 3rd, 23 I can't honestly say if I have or if I haven't. 24 When I met up with him, it was actually more to do 25 with the tipping points than it was to do with anything</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 else. That is something that I need to discuss with you 2 in closed court. 3 But I don't remember seeing Mr Granby with the 4 chronology but I wasn't with him all day, so ... 5 Q. No. Where you say that, "Only intelligence that related 6 to specific subjects would be referred to" -- 7 A. Yes. 8 Q. -- does that mean: would be referred to by me when 9 briefing? 10 A. Yes. 11 Q. Do you know whether Mr Lawler told Mr Granby, "Look, 12 there are only six entries on this chronology that are 13 relevant, ignore the rest"? 14 A. I don't, sir. I don't know. 15 Q. Okay. Can I move on, please, and we will come back to 16 the intelligence chronology and work out which six 17 entries you passed on subsequently. 18 A. Yes. 19 Q. I think an important element in the development of your 20 strategy was the sighting of a hacksaw in the possession 21 of David Totton, on 29 February; is that right? 22 A. Yes. 23 Q. Can I just track through some of the evidence relating 24 to it. Could we start, please, with the evidence of the 25 surveillance officer that saw it.</p> <p style="text-align: center;">Page 29</p>	<p>1 something from the boot and removes his bob hat. The 2 white male, wearing dark clothing, gets into the front 3 passenger seat and Wilt gets into the driver's seat. 4 The vehicle will now be referred to as subject vehicle 5 2." 6 Then, I think there is a supplemental entry, on 7 page 846. 8 A. Yes. 9 Q. Reference entry, 19.59: 10 "Wilt was also wearing black gloves. The item he 11 removed from the boot, he placed in the rear of SP2, not 12 communicated due to poor comms." 13 So, on the basis of the recorded surveillance 14 evidence, it was Mr Totton taking something from the 15 boot of his car and putting it in the rear of his car? 16 A. At that point, yes. 17 Q. I am going to come on -- don't worry -- and develop what 18 happened. 19 A. Yes. 20 Q. I think the next passage in the trail is -- we can put 21 O2 away and go to W, at 441, and is this an email that 22 Mr Talbot sent to you, at 10.48 pm that night? 23 A. Yes. 24 Q. The 29th? 25 A. Yes.</p> <p style="text-align: center;">Page 31</p>
<p>1 A. Yes. 2 Q. It is a DC Connors, and I think that is volume O2 at 3 page 836. 4 Can you see this is the surveillance log of the DSU 5 for 29 February? 6 A. Yes. 7 Q. 2012. 8 A. Yes. 9 Q. Can we go to the entry, please, at 19.59, which should 10 be on page 842. 11 A. Yes. 12 Q. The entry that has been recorded by the loggist and then 13 signed by DC Connors is at 7.59 pm: 14 "Subject: ..." 15 Is it Wilt or Wilf? 16 A. Wilt. 17 Q. "... wearing a black bobble hat ..." 18 That is Mr Totton, isn't it? 19 A. Yes. 20 Q. "... dark top and dark bottom, along with a white male, 21 walked from Hazelhurst towards the Audi A4, MT11 ..." 22 That is what you were calling Mr Totton's legitimate 23 vehicle? 24 A. Yes. 25 Q. "... Subject Wilt walks to the boot of the car, removes</p> <p style="text-align: center;">Page 30</p>	<p>1 Q. Saying: 2 "Sir, I have attached a copy of a 5x5 [which is 3 an intelligence report] regarding the movements of 4 Totton and Grainger after tonight's activity." 5 A. Yes. 6 Q. Then, I think the relevant part is two paragraphs from 7 the bottom in the box: 8 "The Audi ..." 9 There that is referring to the stolen Audi: 10 "... then drives along the East Lincs and drives to 11 Worsley, where Totton is dropped off at his own Audi 12 MT11 and is observed to place a large hacksaw into the 13 boot of his car, and Totton drives away." 14 A. Yes. 15 Q. So, I think that is on the basis that by that time, did 16 you know that surveillance handheld video had been 17 watched? 18 A. At that time of night? 19 Q. Yes? 20 A. I was probably tucked up at home at that time, to be 21 honest, sir, but I found about that the following 22 morning, the fact that the footage had been viewed. 23 Q. Had been viewed, okay. 24 So you know that the line that Mr Totton had placed 25 the hacksaw into the boot of his car, the next morning</p> <p style="text-align: center;">Page 32</p>

1 you learnt that was based on the viewing of some video
 2 footage.
 3 **A. Yes.**
 4 Q. Because it is rather different from what the
 5 surveillance officer saw, isn't it?
 6 **A. I think I have recorded what I was told the following**
 7 **morning off DC Talbot.**
 8 Q. I think we are going to come to that in a moment.
 9 But, in any event, from this surveillance, or this
 10 record, on the 5x5 of the surveillance activity, you
 11 understood that the placing of the hacksaw was into the
 12 boot of Mr Totton's own car?
 13 **A. Yes, but if I could just have a quick look at my book,**
 14 **I think I describe it as -- let me have a look.**
 15 Q. We will come to that in a moment. I am just seeing what
 16 this says, at the moment.
 17 **A. Okay.**
 18 Q. On the face of this record, what you were told is that
 19 what had been observed was the placing of a hacksaw into
 20 the boot of Mr Totton's own car.
 21 **A. Yes, I have not even read that record at that point,**
 22 **so ...**
 23 Q. Right. Did you read it at some point?
 24 **A. I would have done at some point, because I forwarded the**
 25 **email on.**

Page 33

1 Q. Right. This is, on the face of this record, Mr Totton
 2 placing a hacksaw in the boot of his own car, in
 3 Worsley, is that right?
 4 **A. I am a little bit confused with the actual -- where we**
 5 **are up to now, sir?**
 6 Q. We haven't moved anywhere, we are still on 442.
 7 **A. I have moved pages, so ...**
 8 Q. We are still on 442, in W.
 9 **A. Thank you.**
 10 Q. The second paragraph from the bottom.
 11 **A. Yes.**
 12 Q. So, on the face of this record, all that has been seen
 13 is Mr Totton placing a hacksaw in the boot of his car,
 14 his own car?
 15 **A. No, he has got out of the stolen Audi. He has been in**
 16 **the stolen Audi and he has got out, at some point. It**
 17 **has not been seen by the surveillance team where exactly**
 18 **he has got out, but there has obviously been a short**
 19 **loss of observations, but then he has placed the item.**
 20 **So he has come from stolen vehicle and got into**
 21 **legitimate vehicle.**
 22 Q. But it doesn't say that he has brought the hacksaw from
 23 the other car, does it?
 24 **A. No, but it is a fair assessment. The fact that --**
 25 Q. Is it?

Page 34

1 **A. It is a fair assessment, yes.**
 2 Q. Why is that?
 3 **A. Because whatever time of night it was, he has not been**
 4 **seen to go into an address, he has not been seen to**
 5 **suddenly pick up a hacksaw from some random place.**
 6 Q. It might have been what the surveillance officer saw
 7 anyway, which was moving something from one part of his
 8 car to another?
 9 **A. No.**
 10 Q. Do you remember what Mr Connors said? Was he was moving
 11 something from one part of his car to the other, do you
 12 remember, we just looked at it?
 13 **A. I do, I remember what you have just said but we have got**
 14 **a bag being moved and then we have got Mr Totton -- the**
 15 **assessment is that the bag that originally went into**
 16 **that vehicle contained the hacksaw.**
 17 Q. Is it? Where is that assessment?
 18 **A. Sorry, it is not on this page.**
 19 Q. It's not there, is it? No.
 20 **A. No, but it is in my book.**
 21 Q. That is what I am getting at. The purpose of these
 22 documents, the intelligence reports, is that the
 23 intelligence is crystallised and graded, and written
 24 down, isn't it? Yes?
 25 **A. The purpose of the intelligence that we put on this,**

Page 35

1 **here, the reason why these intelligence logs were**
 2 **submitted was for the purpose of (a) we needed something**
 3 **to go on to our intelligence system to link these**
 4 **people. This has got to do with organised crime group**
 5 **mapping of which we'd had a previous -- it has no**
 6 **relation to the ongoing investigation. It is**
 7 **an internal issue within GMP, but we had to log -- this**
 8 **wasn't for the purposes of anything that you are trying**
 9 **to suggest.**
 10 **The other thing that I need to really be clear --**
 11 Q. I never suggested anything, at the moment. I mean,
 12 don't worry.
 13 **A. No, sir, you just said:**
 14 **"It is crystal clear, isn't it, the reason why ..."**
 15 **And then you went on to say something.**
 16 Q. Why did Mr Talbot send it to you? 10.48 that night?
 17 **A. Because I had asked for an update. Because I had asked**
 18 **for an update on the previous -- there was about three**
 19 **logs that all came at the same time with updates. We**
 20 **had to update for -- there were two reasons we had to**
 21 **update, (a) because there needed to be intelligence on**
 22 **the system in relation to when we was looking at part 3**
 23 **applications, and (b) because of the OCG mapping system**
 24 **at GMP, which I can talk about but it is wholly boring**
 25 **and not really appropriate in terms of the reasons why**

Page 36

1 **we are here.**
 2 Q. On the face of this record, there is no evidence that
 3 the hacksaw had been taken to Culcheth?
 4 **A. On the face of this record, sir, you are correct.**
 5 **However --**
 6 Q. You are going to tell me somebody told you something
 7 else?
 8 **A. Sir, what I am going to tell you is: during the course**
 9 **of a surveillance operation, you don't always see one**
 10 **person going from A to B to C, but you see them go to A**
 11 **to C and there is nothing that has intervened in between**
 12 **times which has caused anybody to think that they have**
 13 **not been to B.**
 14 **It is a fair assessment to make at that time, from**
 15 **where Mr Totton was seen, was that the hacksaw was the**
 16 **original item that was seen in the black bin bag, then**
 17 **had been transferred to the stolen vehicle, and then**
 18 **from the stolen vehicle, when he then gets into**
 19 **legitimate vehicle, he has then got the hacksaw with**
 20 **him.**
 21 Q. Let's look at what you wrote up in your casebook then,
 22 which is K/1246, please.
 23 **A. Sorry, could you just give me the number again, please?**
 24 Q. K/1246.
 25 It must be a rogue reference, again. 1243? Thank

Page 37

1 you. No.
 2 (Pause)
 3 Yes, 1243. If we check out the date of this -- in
 4 fact it is 1235 is the best reference, are you there?
 5 Thank you. The date is 29 February 2012.
 6 **A. Yes.**
 7 Q. I think it looks like you had an update that night,
 8 then?
 9 **A. Yes.**
 10 Q. Rather than the first time you heard about it being the
 11 next morning?
 12 **A. No, well, I would have been on during the course of**
 13 **surveillance and then when the surveillance team stand**
 14 **down, I won't stay on for the debrief, I will go home.**
 15 **And then Andrew Talbot, I think, went to the debrief on**
 16 **that particular occasion.**
 17 Q. Okay.
 18 **A. So I am aware what has happened, because I've got my**
 19 **radio.**
 20 Q. You say you update, "Re today's deployment"?
 21 **A. Yes.**
 22 Q. Then, the second bullet point:
 23 "DT has been seen carrying ..."
 24 Can you read the next --
 25 **A. Yes:**

Page 38

1 **"...an item in a black bin liner from one vehicle to**
 2 **another."**
 3 Q. So that night you were not told about that hacksaw?
 4 **A. No.**
 5 Q. Then, over the page, to 1236, you say:
 6 "Update from DC Talbot."
 7 This is as a result of attending the meeting, is it?
 8 **A. Yes.**
 9 Q. "DT was seen moving a hacksaw from one vehicle to
 10 another, stolen to legitimate."
 11 **A. Yes.**
 12 Q. "It is believed that this is what he was carrying when
 13 seen leaving Robert Rimmer's home address."
 14 **A. Yes.**
 15 Q. That further develops what was in the intelligence log
 16 of the previous night, doesn't it?
 17 **A. Yes.**
 18 Q. Which is a further development on what the surveillance
 19 officer saw?
 20 **A. Yes. What the surveillance officer has put on the log**
 21 **is what is --**
 22 Q. All he has seen?
 23 **A. What his observations are, yes.**
 24 Q. Yes. Then, the video has been watched, and Mr Totton
 25 has been seen to put a hacksaw in the boot of his car?

Page 39

1 **A. Because that has come from -- that has come afterwards.**
 2 Q. That the viewing of the video; yes?
 3 **A. Well, that has come afterwards though, hasn't it?**
 4 Q. Yes. What do you mean it has come afterwards?
 5 **A. In terms of Mr Totton must have got into -- he must have**
 6 **been seen getting into his legitimate vehicle.**
 7 Q. Yes.
 8 **A. Yes.**
 9 Q. But the point I am making is that you have recorded here
 10 that Mr Totton was seen moving a hacksaw from one
 11 vehicle to another?
 12 **A. Yes.**
 13 Q. That is neither what the surveillance officer saw, nor
 14 that which is on the 5x5, is it?
 15 **A. No, but it is -- well, I have just explained about**
 16 **the -- it is a fair assessment to make.**
 17 Q. It is a conclusion that has been drawn, or which you
 18 have drawn?
 19 **A. I would say it is a fair assessment, sir.**
 20 Q. Can we look, please, at 1240, which is part of an entry
 21 that you made for 1 March, so later in the day.
 22 **A. Yes.**
 23 Q. You are recording a rationale to request firearms
 24 assistance and you are bullet pointing your reasoning.
 25 **A. Yes.**

Page 40

1 Q. I will just let the chairman sort his file out.
 2 THE CHAIRMAN: I am afraid it has been overloaded and it is
 3 so distorted I cannot turn the pages. I will cope.
 4 1240?
 5 MR BEER: 1240.
 6 THE CHAIRMAN: Yes.
 7 MR BEER: In the second bullet point, about eight lines in,
 8 you say:
 9 "I am concerned ..."
 10 Do you have that?
 11 **A. Yes.**
 12 Q. "I am concerned due to DT [David Totton] being seen
 13 yesterday evening with a hacksaw near to financial
 14 institutions."
 15 **A. Yes.**
 16 Q. Was Mr Totton seen on 29 February with a hacksaw near
 17 financial institutions?
 18 **A. No, that could have been worded more carefully.**
 19 Q. Why was it not?
 20 **A. I can't answer why it wasn't worded more carefully. The**
 21 **point that I am trying to make there is that**
 22 **David Totton has been out in the stolen vehicle, the**
 23 **assessment is that the hacksaw has come out of that**
 24 **stolen vehicle prior to him getting back into his**
 25 **legitimate vehicle and, at the time, he has gone to**

Page 41

1 **Culcheth where there were a number of banks, financial**
 2 **institutions and other places where large amounts of**
 3 **cash were kept.**
 4 **So hence why I have then put it down to -- well,**
 5 **a line.**
 6 Q. You had never been told this, that Mr Totton had been
 7 seen with a hacksaw near financial institutions, had
 8 you?
 9 **A. No, I had never been told that. And, indeed, I think**
 10 **earlier in that day -- yes, earlier in the day I had**
 11 **actually been at the briefing with Mr Lawler, Mr Fitton**
 12 **and I actually took Detective Sergeant -- can I say the**
 13 **names of the surveillance officers or are they --**
 14 Q. It depends which ones.
 15 **A. I took one of the detective sergeants who had been the**
 16 **team leader to make sure that it was clear in terms of**
 17 **what exactly had happened the night previous.**
 18 Q. Would you have passed on what you have written down
 19 here, that Mr Totton had been seen on the 29th with
 20 a hacksaw near financial institutions?
 21 **A. Would I have passed that on to who?**
 22 Q. To anyone?
 23 **A. No, that is me recording the reason why I have gone back**
 24 **to the TFC.**
 25 Q. So, do I get this right, we are to take from your

Page 42

1 evidence that you would have passed on the correct
 2 information, ie David Totton was seen with a hacksaw
 3 placing it into his own vehicle, shortly after arriving
 4 in Worsley, in a car that had been to Culcheth.
 5 **A. At the actual briefing, I had the team leader who was on**
 6 **at the time, so it was from the horse's mouth. Well,**
 7 **not from the horse's mouth because he was not the**
 8 **surveillance officer, but it was from the team leader**
 9 **who was there at that time.**
 10 Q. But you cannot explain why you have written down
 11 an exaggeration?
 12 **A. I wouldn't call it an exaggeration. Is it brevity? Is**
 13 **it --**
 14 Q. What would you call it?
 15 **A. Is it brevity? It is the way that I've phrased it.**
 16 Q. Hold on, have you said, "Is it brevity"?
 17 **A. Yes, in terms of --**
 18 Q. You are not really expressing something with fewer words
 19 than might be necessary, which is brevity, isn't it?
 20 You are describing a different course of events, aren't
 21 you?
 22 **A. When I just described it to you, I probably described it**
 23 **in five or six different sentences, whereas I have**
 24 **actually written down -- as you have quite rightly said**
 25 **earlier -- bullet point. Now, I also conceded, right at**

Page 43

1 **the start, to say, yes, it could have been written more**
 2 **carefully. I accept that.**
 3 Q. You don't think this is an exaggeration?
 4 **A. Sir, it is not an exaggeration.**
 5 Q. Placing Mr Totton with a hacksaw near a financial
 6 institution?
 7 **A. No. For whose purpose, sir? For my own purpose.**
 8 Q. We are going to look to see what other people were told,
 9 in a moment.
 10 But you think you were just -- you have misworded it
 11 through an attempt at brevity?
 12 **A. Yes.**
 13 Q. Did you ever receive any evidence or intelligence that
 14 the subjects in Culcheth had been surveyed emerging from
 15 a bush line near the town centre shops, with a hacksaw?
 16 **A. No.**
 17 Q. Could we look, please, in your file, please -- we can
 18 put this one away, I think. Your volume 1, at tab 14.
 19 This is 341, this is X7 speaking in the briefing. We
 20 can see it is X7 speaking --
 21 **A. Yes.**
 22 Q. -- from the foot of 338.
 23 **A. Yes.**
 24 Q. He is, I think, orientating the AFOs as to the scene
 25 and, middle of the page, he says:

Page 44

1 "Okay, direct contact. If the subjects do come to
 2 this location, they have been seen to park up in the car
 3 park here, and they have been taking particular --
 4 observing this area here which is a secure compound.
 5 This is all Sainsbury's and that is the entrance to
 6 Sainsbury's superstore here. There is a locked gate
 7 there, and a padlocked gate there. Here, on this bush
 8 line, has got a metal fence behind it. They have been
 9 seen driving up here and a third subject has been seen
 10 emerging from this bush line here with a hacksaw and
 11 getting into the vehicle and driving off."
 12 Then he continues.
 13 **A. Yes.**
 14 Q. You, I think, have confirmed that you had never heard
 15 about or seen any evidence, or intelligence, that
 16 a subject had been seen emerging from the bush line with
 17 a hacksaw at that location, had you?
 18 **A. No, that is correct.**
 19 Q. Did you provide X7 with that information?
 20 **A. No, I didn't. Was X7 at the briefing earlier in the**
 21 **day? Can we --**
 22 Q. Which briefing earlier in the day? This the 5.57 one.
 23 I am not sure there was one earlier than 5.57.
 24 **A. Sorry, this is Saturday.**
 25 Q. This is Saturday the 3rd. This is the briefing that you

Page 45

1 are at with Superintendent Granby, the 16 firearms
 2 officers, including X7.
 3 **A. No, because on that occasion I had not briefed in**
 4 **relation to that incident.**
 5 Q. You see, we have down in your notebook, that you
 6 thought, the way you have written it, that a subject had
 7 been seen on the 29th near a financial institution with
 8 a hacksaw.
 9 **A. Yes.**
 10 Q. We have on the 3rd, X7 saying:
 11 "A subject has been seen emerging from this bush
 12 line which is next to a financial institution with
 13 a hacksaw."
 14 **A. This is next to the Sainsbury's, isn't it?**
 15 Q. Yes.
 16 **A. The only thing we ever saw at that location -- and this**
 17 **is why I was asking who was present on -- it is relevant**
 18 **to the briefing on 1 March. Because on 1 March, the DS**
 19 **from the DSU actually gave an update in terms of what**
 20 **had occurred, I actually took him to the briefing so he**
 21 **could do that. So he has provided the information in**
 22 **relation to what had happened on that particular day in**
 23 **relation to the surveillance, straight from the horse's**
 24 **mouth.**
 25 Q. Who was the horse?

Page 46

1 **A. Sorry?**
 2 Q. Who was the horse?
 3 **A. The horse's mouth was the officer that had --**
 4 Q. Done the surveillance?
 5 **A. Done the surveillance, yes.**
 6 Q. The horse was DC Connors.
 7 **A. It was his team leader.**
 8 Q. The horse in this case had not seen anything about
 9 a hacksaw, less still next to a financial institution
 10 emerging from a bush line.
 11 **A. If I can just continue, sir.**
 12 **So the team leader was present and briefed in terms**
 13 **of what had happened -- what had been seen to happen;**
 14 **okay? Because the team leader was present with the**
 15 **team. He was out on the ground; okay? So that was the**
 16 **briefing that took place on the 1st for the deployment**
 17 **on the 2nd, which is why I was interested to see if X7**
 18 **was on that briefing.**
 19 Q. Okay, we will investigate that. But can you explain why
 20 something that looks suspiciously like what you have
 21 written down in your casebook then appears in a briefing
 22 given to the AFOs two days later?
 23 **A. Well, I can't explain, but I know that certainly has not**
 24 **come from me.**
 25 **The only time that we have said that the subjects**

Page 47

1 **have actually stopped near to that location is when they**
 2 **were in a vehicle and they were actually observing**
 3 **across the road. That took place on the 29th**
 4 **of March -- February.**
 5 Q. You say to the chairman that it is coincidence that what
 6 is written down in your book, which is wrong, is the
 7 same as -- let me finish the question -- you say it is
 8 coincidence that what you have written down in your
 9 book, which is wrong, is very similar to what X7 has
 10 said and is wrong?
 11 **A. If you are saying it is very similar, I am saying it is**
 12 **coincidence because I have never briefed in that regard.**
 13 **I have never said it to anybody else. I have never**
 14 **briefed anybody in that regard.**
 15 **If we go back to the briefing -- we have got to go**
 16 **back to the first -- and this something that is really,**
 17 **really important, because the briefing on the 1st was in**
 18 **relation to activity of the 29th.**
 19 **The briefing on the 3rd wasn't to do with that**
 20 **previous briefing. It was a separate briefing. It was**
 21 **a new firearms authority.**
 22 Q. So what you want to do is you want to go back to the
 23 recording, do you, of the firearms briefing that was
 24 given out on 1 March?
 25 **A. I think before we go to that, I think we need to go to**

Page 48

1 the actual notes that were taken by --
 2 Q. Mr Lawler and Mr Fitton?
 3 A. -- Mr Lawler, Mr Fitton, if they have got anything
 4 recorded in terms of surveillance.
 5 I know that Mr Lawler does not record the fact that
 6 the surveillance officer was present.
 7 Q. I am not following why you say that is important, that
 8 we look at a briefing that didn't result in --
 9 A. Sir, could we go to Mr Lawler's document?
 10 Q. Yes, absolutely. You want to go to Mr Lawler's log,
 11 which I think is tab -- it is the last tab in volume 1,
 12 which is 21, I think.
 13 What part of this do you want to look at? I mean,
 14 his record is on 369 and 370.
 15 A. 370. If you look at 370, it doesn't make mention there
 16 of the surveillance, the person from the surveillance
 17 unit who was present, who provided the briefing. He
 18 also refers to the 5x5 intelligence reports; okay?
 19 Which is the information that DC Talbot prepared and
 20 which I had sent in the email, which didn't contain
 21 anything about the hacksaw being seen at the --
 22 Q. No, it was the very limited, "It has been seen placed in
 23 a boot".
 24 Go on.
 25 A. Yesterday, when you took me to --

Page 49

1 Q. What you are doing is you are showing us this to say
 2 that, on the face of Mr Lawler's record, he has not been
 3 briefed with the false information?
 4 A. Well, he has not been briefed on any false information
 5 because I have never presented that information.
 6 Q. I am calling the false information that Totton was seen
 7 with a hacksaw emerging from bushes next to a financial
 8 institution; okay?
 9 A. Sorry?
 10 Q. That is what I was describing for shorthand as the false
 11 information.
 12 A. Okay.
 13 Q. So it is not in here?
 14 A. No, it is not in here.
 15 Q. Then do you want to look at Mr Fitton's record, as well?
 16 A. I need to draw your attention to item E on that same
 17 page, 370.
 18 Q. "Subjects carry out recces of Culcheth Parade,
 19 Warrington, during the early evening of Monday 27th,
 20 29th and Thursday, 1 March."
 21 Yes?
 22 A. I am sure you have already picked up on this, sir.
 23 Q. I don't know. It is not a cross examination of me. If
 24 you want to lead this session, then just go ahead. Go
 25 ahead.

Page 50

1 A. I briefed at 12.30 in the afternoon, on 1 March. This
 2 makes mention, Thursday 1 March, that there has been --
 3 during the early evening of Monday, Wednesday and
 4 Thursday 1 March.
 5 Well, if this had been written at 12.30, that
 6 reconnaissance in the afternoon -- in the evening, had
 7 not taken place.
 8 Q. You are off on a completely different tangent, showing
 9 that Mr Lawler's notes cannot be relied on; is that
 10 right?
 11 A. The point I am saying to you is the -- that's not the
 12 point I am making. The point is, in terms of what has
 13 been recorded, during the course of that briefing, it
 14 was really important that the surveillance officer was
 15 present. That's not recorded.
 16 Q. So you are pointing out two errors in Mr Lawler's note
 17 taking; is that the purpose of this?
 18 A. Because I think it is relevant to the fact that I have
 19 taken somebody from the dedicated surveillance unit who
 20 was actually on duty at the time. There is only one
 21 occasion when we actually had surveillance on the 29th,
 22 where we have seen the movements around the area, where
 23 all the financial institutions are, the lay out of the
 24 area. That is why it is vitally important that that
 25 officer went to that briefing.

Page 51

1 The point I am raising is there is nothing in here
 2 that actually mentions the fact -- of what has been
 3 briefed on on that occasion, because I know I have
 4 certainly not briefed in relation to the point you have
 5 just raised.
 6 Q. Is the position this then: that although there is
 7 something that looks very suspiciously like what you
 8 have written down in your notebook, which is
 9 incorrect --
 10 A. Yes.
 11 Q. -- "Briefed by X7 on the 3rd", they are very similar,
 12 aren't they; yes?
 13 A. They are.
 14 Q. You cannot explain how that has happened?
 15 A. I can't explain how it has happened, but if you look at
 16 what the officer has actually written, in terms of
 17 somebody getting out of the vehicle, out of the bush
 18 line, there is nothing, no mention of that. Surely if
 19 I was going to put something in my book, I would have
 20 actually written to say, "And somebody has been seen to
 21 get out of the vehicle. They have been stopped at this
 22 location."
 23 The only information that was passed, that I do
 24 remember, was in relation to the Audi having an eyeball
 25 of the area where the service road ran, leading to the

Page 52

1 **back of Sainsbury's.**
 2 Q. Can we look, please, at tab 10 of this bundle.
 3 I think this is a report that you prepared on
 4 9 July 2012 for the IPCC.
 5 **A. Yes.**
 6 Q. On the second page, at 3168, you are speaking about
 7 a briefing on 2 March.
 8 **A. Yes.**
 9 Q. You say:
 10 "The 2nd March briefing included information
 11 regarding the tie up robbery as this was potentially
 12 relevant to a sighting of Totton with a hacksaw on
 13 29 February, when the OCG were observed in the Culcheth
 14 area."
 15 **A. Yes.**
 16 Q. That is wrong as well, isn't it?
 17 **A. Well --**
 18 Q. Isn't it?
 19 **A. Not if you break the sentence down:**
 20 **"The sighting of Totton with a hacksaw on**
 21 **29 February, and on 29 February the OCG were observed in**
 22 **the Culcheth area."**
 23 Q. Is that not what it says though, is it? It says:
 24 "There was a sighting of Totton with a hacksaw on
 25 29 February when the OCG was observed."
 Page 53

1 **A. If that is down to my education and the way I write**
 2 **things down, well, that is down to that. I cannot**
 3 **explain it other than that is what I am trying to**
 4 **articulate.**
 5 **The connection was the sighting of the hacksaw --**
 6 **confirmed sighting of a hacksaw. The fact that there**
 7 **has then been a visit to Culcheth in a stolen vehicle on**
 8 **false registration plates, near to where there are**
 9 **financial institutions and lots of places that have**
 10 **large amounts of cash, and then the following morning**
 11 **I get made aware of this intelligence from this previous**
 12 **incident.**
 13 Q. So this is a second example of the information about the
 14 sighting of the hacksaw being wrongly worded, is it?
 15 **A. Well, if that is down to my comprehension, then,**
 16 **I apologise, sir, but it is not something that has been**
 17 **articulated.**
 18 Q. In short, you would say that you are not the source of
 19 the false information that Mr Totton was seen with
 20 a hacksaw, or a person was seen with a hacksaw?
 21 **A. I am certainly not the source and --**
 22 Q. Do you know -- any idea, who is?
 23 **A. I don't know who is. I don't know where that has come**
 24 **from. I don't know if the firearms officers have spoken**
 25 **to surveillance officers. They work next door to each**
 Page 54

1 **other. I don't know what has happened, but it has**
 2 **certainly not come from me.**
 3 MR BEER: Sir, might that be a convenient moment?
 4 THE CHAIRMAN: Yes. We will take a break until 11.55.
 5 (11.46 am)
 6 (A short adjournment)
 7
 8 (11.59 am)
 9 MR BEER: Thank you, sir.
 10 Mr Cousen, can I turn to the nature of the briefing
 11 you gave to Superintendent Granby, at I think about
 12 7.00, or 7.05, on Friday the 2nd.
 13 **A. Yes.**
 14 Q. Can we turn up, please, tab 6 of volume 1 of your
 15 witness file.
 16 **A. Yes.**
 17 Q. Look at page 20 of 24. Three paragraphs from the
 18 bottom, the second sentence, you say:
 19 "I briefed J18 over the telephone and provided
 20 relevant information and intelligence on David Totton,
 21 Robert Rimmer and Anthony Grainger only."
 22 **A. Yes.**
 23 Q. Yes. So this was a telephone briefing alone?
 24 **A. Yes.**
 25 Q. I think we can see from your note -- we have looked at
 Page 55

1 them before, I am not going to turn them up -- your
 2 reference, sir, is K/1245, that the briefing started, on
 3 your note, at 7.05?
 4 **A. Yes.**
 5 Q. Can we look, please, at Superintendent Granby's notes of
 6 the briefing. That is this volume, tab 16.
 7 Can you see, in tab 16, his policy file and decision
 8 log?
 9 **A. Yes.**
 10 Q. At page 385, can you see his notes of a telecon with
 11 SIO, Detective Inspector Cousen, at 19.00 hours.
 12 **A. Yes.**
 13 Q. This is the same briefing we are talking about.
 14 **A. Yes.**
 15 Q. He records information and intelligence, record or
 16 recorded in TFC booklet for authority 75 of 12:
 17 "Revised intelligence included in SIO's policy book.
 18 This is sensitive intelligence. Operation Shire has
 19 been running for several months. Additional information
 20 in email from TFC Mike Lawler, at 19.41."
 21 **A. Yes.**
 22 Q. "Cross-reference with other sources indicates capability
 23 and intent of named subjects. Stolen car on false
 24 plates is parked in Boothtown area. Subjects have been
 25 actively reccyng Culcheth area, although not clear what
 Page 56

1 target is. Intelligence flow: SIO to TFC. Technical on
 2 three vehicles. Grainger VW Golf. Rimmer [I can't see
 3 what that says] ... and stolen Audi. Insufficient
 4 evidence CPS believe to arrest currently
 5 [something] ... if three subjects are [something] in
 6 stolen vehicle. This moves towards evidential
 7 requirement."
 8 Then he moves on to something else.
 9 **A. Yes.**
 10 Q. Can you see, in the left-hand column of both of those
 11 pages, next to date and time, it says, "Intelligence
 12 grading"?
 13 **A. Yes.**
 14 Q. Is that to record where the intelligence is graded on
 15 the National Intelligence Model 5x5 matrix?
 16 **A. I would expect so. It is not a document that I would**
 17 **complete, but I would expect so.**
 18 Q. Did you provide the grading for the intelligence that
 19 you were handing over to Mr Granby?
 20 **A. For the items from the chronology or the other**
 21 **intelligence?**
 22 Q. Any.
 23 **A. I possibly did for the chronology.**
 24 Q. So the items on the intelligence chronology --
 25 **A. Yes.**

Page 57

1 Q. -- you told him that possibly --
 2 **A. Yes, possibly.**
 3 Q. How clear is your recollection of --
 4 **A. It is not. It is not -- you asked me earlier in terms**
 5 **of exactly what did I say, did I read it verbatim.**
 6 **Well, I can't say that I did and I probably wouldn't**
 7 **have done.**
 8 Q. So that is one category, the six items from the
 9 intelligence chronology.
 10 **A. Yes. Yes.**
 11 Q. Did you give him any information from 5x5s that weren't
 12 on the intelligence chronology?
 13 **A. No.**
 14 Q. Did you tell him about some sensitive information that
 15 we are going to speak about in closed hearing?
 16 **A. Yes.**
 17 Q. Did you give him any other information?
 18 **A. Information or intelligence?**
 19 Q. Either.
 20 **A. I gave him -- in relation to the overall operation, it**
 21 **wasn't just a kind of a two minute conversation.**
 22 Q. Did you give him any other intelligence?
 23 **A. No, sorry. No.**
 24 Q. Did Mr Granby ask you what the intelligence grading of
 25 the intelligence you were providing him with was?

Page 58

1 **A. I don't remember him doing -- he may have done, but**
 2 **I don't remember him doing that.**
 3 Q. If we just look, please, at tab 15 in this same volume,
 4 the equivalent book for Mr Sweeney, the Assistant Chief
 5 Constable. Do you have tab 15?
 6 **A. Yes.**
 7 Q. If you go to his summary of key intelligence, on
 8 page 324.
 9 **A. Yes.**
 10 Q. You can see that the intelligence grading column is
 11 blank as well, isn't it?
 12 **A. Yes.**
 13 Q. Can we look at tab 17, please, which is the TAC advisers
 14 book for this deployment.
 15 **A. Yes.**
 16 Q. If you look at page 483.
 17 **A. Yes.**
 18 Q. The intelligence grade, where it actually says "5x5x5
 19 column", is blank too.
 20 **A. Yes.**
 21 Q. So for the three key members of the -- three of the key
 22 members of the firearms command team, the TAC adviser,
 23 the tactical firearms commander and the strategic
 24 firearms commander, the grading of the intelligence upon
 25 which they were acting has not been recorded by the look

Page 59

1 of it; is that right?
 2 **A. That's correct.**
 3 Q. Do you think, looking at that, you did provide Mr Granby
 4 with the grading, it is just that he has not written it
 5 down?
 6 **A. I can't honestly say, sir. I don't recall. I may have**
 7 **not have done. I might have done.**
 8 Q. Okay.
 9 Can we look, please, at tab 21, which is Chief
 10 Inspector Lawler's book for the previous deployment.
 11 **A. Yes.**
 12 Q. Do you have that?
 13 **A. Yes.**
 14 Q. If we look at page 369, can we see that despite quite
 15 a lot of intelligence being provided, in between letters
 16 A to G, the intelligence column remains blank?
 17 **A. Yes.**
 18 Q. Did you provide the 5x5 grading for the intelligence you
 19 were passing on?
 20 **A. Mr Lawler had the chronology document.**
 21 Q. Yes, but some of this intelligence is not on the
 22 intelligence chronology, is it?
 23 **A. No, some of isn't. I mean, the first one that is**
 24 **mentioned there.**
 25 Q. Isn't.

Page 60

1 **A. It's -- I can't remember if on the email if it actually**
 2 **has the intel rating on it, or if it just says the COPU**
 3 **number on it.**
 4 Q. I think it just has the COPU number, but we can check
 5 that because I think it will be redacted in our version,
 6 in any event.
 7 **A. Okay.**
 8 Q. But B and onwards, looking at the column generally, it
 9 is not graded; do you remember whether he asked to give
 10 you the intelligence grading?
 11 **A. No, I mean looking at them, I don't know if they would**
 12 **all have an intelligence grading because the third one:**
 13 **"Subjects obtain stolen Audi."**
 14 **Sorry, top of page 370:**
 15 **"Subjects obtain stolen Audi. Now on false plates."**
 16 Q. "Now on false plates."
 17 That's a fact.
 18 **A. Yes, I don't think he would put a grading next to --**
 19 Q. Would you not put a high grading next to that; that it
 20 is known to the officer concerned and --
 21 **A. I don't fill these out, so I wouldn't --**
 22 Q. Are you generally asked the question by the TFC: what is
 23 the grading for this, Rob?
 24 **A. You do, if it is a COPU log or if it is a FIS log then**
 25 **you will get asked the question. FIS is from the OPUS,**

Page 61

1 **sorry.**
 2 Q. Yes.
 3 So you have been asked in the past to provide the
 4 National Intelligence Model 5x5 grading.
 5 **A. Yes.**
 6 Q. I think we can see some examples of that, if we put
 7 volume 1 down for a moment and look at volume 2. Can
 8 you look at tab 24, please.
 9 I think this was Mr Shewan and then Mr Heywood's
 10 book.
 11 **A. Yes.**
 12 Q. For a previous deployment on 25 January, one that we
 13 have spoken about in the past. Can you see, on
 14 page 2275, in the equivalent to Mr Sweeney's book, and
 15 we have seen his similar column in the TAC adviser's
 16 book and in the silver's book, he has written down the
 17 intelligence grading; do you think that would have come
 18 either directly from you or indirectly from you?
 19 **A. Yes. It would have come from Mr Ellison. That would**
 20 **have come from Mr Ellison.**
 21 Q. From Mr Ellison.
 22 **A. But from me, yes.**
 23 Q. So indirectly from you?
 24 **A. Yes.**
 25 Q. This was quite a common thing, was it, that you would be

Page 62

1 asked: what is the grading of stuff that has come off
 2 a COPU or a FIS log?
 3 **A. Yes.**
 4 Q. Thank you. But you cannot remember whether you were
 5 asked it on 2 and 3 March, and it is just they have not
 6 written it down?
 7 **A. Sorry, sir, I can't. No.**
 8 Q. And they were not asked.
 9 Would you volunteer it?
 10 **A. Sometimes maybe I would. I might say, "I've got a B2**
 11 **rated log here", sometimes I would, sometimes**
 12 **I wouldn't, "I've got a log that says, 'Dah, di, dah,**
 13 **di, dah'."**
 14 Q. What would determine whether you would tell them or
 15 wouldn't tell them?
 16 **A. I don't know, it's just whether it actually sprung to**
 17 **mind to say it or not.**
 18 Q. Okay. Would it be fair to say that the process that
 19 Superintendent Ellison and then Mr Shewan went through,
 20 back on the weekend of the -- I am not sure it was the
 21 weekend, but the days of the 25th and 26th, was a more
 22 in depth process than you experienced with Mr Granby on
 23 Friday, the 2nd?
 24 **A. I think we had just looked at the logs, hadn't we, so we**
 25 **have seen clearly there is a lot more written there, so**

Page 63

1 **yes.**
 2 Q. Not just whether there was more written --
 3 **A. In the time as well, at the time. I think Mr Ellison**
 4 **was with probably for four or five hours.**
 5 Q. I was just going to ask you about that. If you look
 6 back at volume 1 of your files, please, and look at
 7 tab 6, page 89.
 8 **A. Yes.**
 9 Q. At page 19 of 24, at the foot, you are dealing with the
 10 25th here.
 11 **A. Yes.**
 12 Q. At the foot of the page, the last paragraph, you say:
 13 "I therefore requested a firearms cadre, a risk
 14 assessment, with officer TA."
 15 That is Superintendent Ellison.
 16 **A. Yes.**
 17 Q. "Superintendent Ellison requested a lot of information
 18 which included DC Clark providing further criminal
 19 antecedents, but after some five hours' consideration
 20 authority was given by the SFC to
 21 Superintendent Ellison."
 22 **A. Yes.**
 23 Q. That gives the impression that it was both a long time,
 24 in terms of hours, and involved some probing by
 25 Superintendent Ellison asking for further information to

Page 64

1 be provided.
 2 **A. Yes.**
 3 Q. And you providing, through DC Clark, some further
 4 information.
 5 **A. Yes.**
 6 Q. Would it be fair to say that, looking back to it, that
 7 was quite a rigorous and testing process that
 8 Superintendent Ellison put you and your information
 9 through --
 10 **A. Yes.**
 11 Q. -- before approaching the ACC?
 12 **A. Yes.**
 13 Q. If you use that as an example, there wasn't
 14 an equivalent process on Friday the 2nd with Mr Granby?
 15 **A. Well, it was a phone call. Mr Ellison had actually come**
 16 **to Nexus House to do the briefing with him. The**
 17 **briefing with Mr Granby was over the telephone.**
 18 **I think I mentioned it yesterday that each of the**
 19 **TFCs have different ways of doing it. Whether it is**
 20 **over the phone or -- but yes, it is a fair assessment,**
 21 **in answer to your question.**
 22 Q. Did Mr Granby test and probe the case that you were
 23 putting to him for a firearms deployment?
 24 **A. He certainly asked questions, yes.**
 25 Q. That is rather different. Did he test you and probe,

Page 65

1 a bit like Mr Ellison seems to have done?
 2 **A. Well, I didn't have to go away and come back with more**
 3 **information, if that is kind of the point that you are**
 4 **getting to. Whatever information I needed to give him**
 5 **satisfied him to be able to make the assessment, so ...**
 6 Q. Would this be a fair conclusion to draw: there had been
 7 an authority granted the night before, on Chief
 8 Inspector Lawler's application?
 9 **A. Yes.**
 10 Q. And the way that Mr Granby's notes read, is just that
 11 this has already been done the night before, this is
 12 just a repeat job, so I don't really need to test and
 13 probe the SIO about the information, because we got
 14 an authority the night before?
 15 **A. But it was completely different. You know, this was**
 16 **down to intelligence. It was a completely different**
 17 **deployment, so ...**
 18 Q. Did he test you and probe you about the nature of this
 19 being a completely different deployment?
 20 **A. I can't say, "Test and probe", but he certainly asked me**
 21 **questions.**
 22 Q. What did he ask you questions about?
 23 **A. I can't remember specifically, but I know it was not**
 24 **a one way conversation of me talking and then Mr Granby**
 25 **just listening. He was certainly asking questions.**

Page 66

1 Q. You see, we have seen in his log he hasn't written down
 2 any intelligence at all, has he?
 3 **A. No, I understand that.**
 4 Q. He has just said, "See last night".
 5 **A. He has, but I can't really comment in terms of --**
 6 **I don't know where he was when he has taken that down.**
 7 **I don't know whether he was in the office or if he was**
 8 **at home. I don't know. I don't know where he was at**
 9 **that point.**
 10 Q. You cannot remember what questions he asked you?
 11 **A. No.**
 12 Q. Did he probe the intelligence case you were putting to
 13 him?
 14 **A. In terms of?**
 15 Q. Anything.
 16 **A. Not that I specifically recall, that I needed to go back**
 17 **to him with any information, or certainly nothing that**
 18 **I couldn't answer.**
 19 Q. Can we turn then to the briefing of the strategic
 20 firearms commander. Can we look in your volume 1, at
 21 tab 15. This is Mr Sweeney's log.
 22 **A. Sorry, volume 1, tab 50?**
 23 Q. 15.
 24 **A. Thank you. Yes.**
 25 Q. Can you see it was commenced on 2/3 and completed on

Page 67

1 3/3, and I think the first entry of substance is on
 2 page 324.
 3 **A. Yes.**
 4 Q. Where he says:
 5 "This operation is subject to sensitive
 6 intelligence. I received a briefing from ACC Heywood."
 7 Just stopping there, Mr Heywood was the strategic
 8 firearms commander on the 1st into 2 March; is that
 9 right?
 10 **A. Yes.**
 11 Q. Yes. He says:
 12 "Regarding the recent operational deployments that
 13 relate to the actions of the three principal subjects."
 14 Then he lists them and their warning markers; yes?
 15 **A. Yes.**
 16 Q. "The information/intelligence to date indicates the
 17 intention of the subjects is to commit armed robberies
 18 across north-west England. The subjects are believed to
 19 be responsible for an armed robbery in Preston, in 2008,
 20 where they broke into a bank premises and held staff at
 21 gunpoint using a shotgun and handgun. Subjects have
 22 access to the stolen vehicles to facilitate offences."
 23 Again, the 2008 robbery in Preston, that is
 24 information which originated from you but you didn't
 25 speak to Mr Sweeney directly about it.

Page 68

1 **A. No, I didn't, and -- I didn't brief Mark Granby in any**
 2 **detail in relation to that incident.**
 3 Q. No. Do you know where Mr Sweeney got it from then?
 4 **A. He has got to have been briefed by Mr Granby, hasn't he?**
 5 **I don't know what time -- what time is that?**
 6 Q. He doesn't put a time on it.
 7 **A. I don't know where he has got the information from. He**
 8 **was aware, Mr Granby was aware because I had mentioned**
 9 **the fact that we had already had a deployment and he**
 10 **said he was already aware of Operation Shire, so he was**
 11 **already aware of it. So whether or not that has then**
 12 **come up in conversation, but I am kind of trying to**
 13 **guess between two other people, aren't I?**
 14 Q. The long and the short of it is the false information,
 15 as I have called it, insofar as it attributes the 2005
 16 robbery in Preston using a handgun and a shotgun, to
 17 Anthony Grainger and Mr Totton, has been provided to the
 18 man that decides whether to grant an authority or not?
 19 **A. Yes.**
 20 Q. Okay.
 21 **A. I think, if I could just add there as well -- again, it**
 22 **is something I am going to speak to in closed court --**
 23 **is that things cannot be written down in relation to the**
 24 **update that I had given, so that may have a bearing on**
 25 **it, too.**

Page 69

1 Q. Just so that those who are not going to come into the
 2 closed hearings of the Inquiry, can you confirm that
 3 none of the closed material related to a robbery in
 4 Preston in 2005 or 2008?
 5 **A. Yes, it didn't.**
 6 Q. It didn't. So it doesn't have a bearing on the
 7 inclusion of that?
 8 **A. No.**
 9 Q. Can we move on to page 326, please.
 10 In Mr Sweeney's log, where he is setting out the
 11 capability and intent of the subjects, and under the
 12 question "What has the TFC determined from the ICI
 13 process?"
 14 "Threat: use of lethal force? Firearms? Weapons?
 15 Pursuit?"
 16 Mr Sweeney has written:
 17 "Subjects are believed to have access to firearms
 18 and other weapons to commit robbery offences."
 19 Did you provide Mr Granby with any information or
 20 intelligence that the subjects had access to firearms to
 21 commit robbery offences?
 22 **A. No, the only intelligence I provided is what was on the**
 23 **chronology document.**
 24 Q. So the answer is, "No", then?
 25 **A. Yes.**

Page 70

1 Q. Is that right?
 2 **A. Yes. If I could -- I can't remember what all the logs**
 3 **say, the six logs. I can't remember what I referred to**
 4 **on there, but I have certainly not given directly as per**
 5 **that.**
 6 Q. Do you know where Mr Sweeney has this from then, other
 7 than it is not from you?
 8 **A. Well, I suspect it is in relation to speaking to**
 9 **Mark Granby, and I suspect, also, it is in relation to**
 10 **the capability. The assessment is about the capability**
 11 **of the subjects.**
 12 Q. Mr Sweeney continues:
 13 "All subjects have previously used violence to
 14 commit offences."
 15 Did you provide that information to Mr Sweeney?
 16 **A. No.**
 17 Q. Do you know where he has that from, as far as concerns
 18 Mr Grainger?
 19 **A. No, sir.**
 20 Q. We look, please -- we can put that away, please -- at
 21 G1/3593. G1/3593.
 22 **A. Yes.**
 23 THE CHAIRMAN: G/593.
 24 MR BEER: G1/3593. 3593.
 25 I think this is Mr Heywood's book for the first into

Page 71

1 the second deployment; yes?
 2 **A. Yes.**
 3 Q. If we look, please, at 3601 --
 4 **A. Yes.**
 5 Q. Are you on 3601?
 6 **A. Yes.**
 7 Q. Rather oddly, just by way of side comment, this was
 8 a log filled out, I think, two days before that of
 9 Mr Sweeney, that is in a different format, isn't it?
 10 **A. Yes.**
 11 Q. Because on this version of GMP's log for the strategic
 12 firearms commander, there is no column for 5x5.
 13 **A. No.**
 14 Q. So it looks like there were at least two versions of
 15 a document in which strategic firearms commanders could
 16 record the intelligence provided to them; one that had
 17 a 5x5 column in it and one that didn't. In any event,
 18 there is a record of a telephone conference between you
 19 and Mr Lawler and Mr Heywood?
 20 **A. Yes.**
 21 Q. Would that be normal, that you would be brought into the
 22 discussion with the gold, with the ACC?
 23 **A. Sometimes. Yes, sometimes you would.**
 24 Q. What determines the sometimes, whether you were brought
 25 in or not?

Page 72

1 **A. Whether or not it is down to the request of the SFC or**
 2 **not, I don't know. I have done numerous of these, and**
 3 **sometimes you do and sometimes you don't. Just like**
 4 **sometimes you go to the firearms briefings and sometimes**
 5 **you don't.**
 6 Q. Do you have any influence over that?
 7 **A. No.**
 8 Q. Do you say, "I want to make my pitch direct to gold"?
 9 **A. No. No, because once I have done my pitch to the TFC,**
 10 **that is kind of my bit done.**
 11 Q. Do you know why you were brought into this briefing of
 12 the gold then?
 13 **A. It might have been that Mr Heywood wanted to speak**
 14 **direct to me.**
 15 Q. Okay, it says --
 16 **A. He might have requested that.**
 17 Q. It says:
 18 "Telephone contact from Chief Inspector Lawler and
 19 Rob Cousen regarding Operation Shire. Ongoing robbery
 20 investigation regarding Totton, Grainger, et al."
 21 Then:
 22 "Previous history of Totton and Grainger suggests
 23 ability to access firearms and the intent to use such
 24 firearms to commit crime."
 25 Did you tell Mr Heywood that the previous history of

Page 73

1 Mr Grainger suggests meant that he had an ability to
 2 access firearms?
 3 **A. I certainly don't remember doing so, sir.**
 4 Q. It would be wrong if you had.
 5 **A. Mr Totton.**
 6 Q. Yes, did you tell Mr Heywood that Mr Grainger had
 7 an intent to use firearms to commit crime?
 8 **A. We didn't have that information, sir.**
 9 Q. But did you say it to Mr Heywood?
 10 **A. No. It was about the capability, as I have said.**
 11 **I think it has been mentioned on some of the briefings.**
 12 **I never actually said at any point in terms of actually**
 13 **having access to weapons, it was always about the**
 14 **capability to have access to weapons.**
 15 Q. So can you recall Mr Lawler saying something to
 16 Mr Heywood that, on your understanding, was not correct?
 17 **A. No.**
 18 Q. So do you know how this, again, exaggerated picture has
 19 been put to this gold commander?
 20 **A. No.**
 21 Q. I think you would agree that this is an exaggerated
 22 picture, so far as it concerns Mr Grainger?
 23 **A. Yes, sorry, I was just trying to think, in terms of**
 24 **Anthony, obviously at the time I had the crime going**
 25 **back to the conspiracy to rob, which we may come on to**

Page 74

1 **today. So, at the time, my understanding was that he**
 2 **had been through the -- well, he had been to court and**
 3 **then that it was to lie on file, so Mr Heywood would**
 4 **have been briefed on that at that time.**
 5 Q. So that might be it, might it? It might be Operation
 6 Vulture in 1995 that is the foundation for the
 7 suggestion that the previous history of Mr Grainger
 8 suggests an ability to access firearms?
 9 **A. Well, the fact that he had been charged with**
 10 **a conspiracy to rob encompassing a robbery where**
 11 **a firearm had been used or presented, that -- again,**
 12 **I am kind of trying to answer for somebody else here,**
 13 **but I am just thinking --**
 14 Q. But he has written down a note of a telephone call with
 15 you.
 16 **A. I know he has. I know he has.**
 17 **I can't remember -- I can remember speaking to**
 18 **Mr Heywood but I am just trying to think of what it**
 19 **would have been and I am pretty certain that is where it**
 20 **is likely to have stemmed from.**
 21 Q. Okay. We will come back to, as you have said, that
 22 factual foundation.
 23 But this, on your understanding, is a reference to
 24 something that you may have said about Operation Vulture
 25 in 1995, that you knew because you had accessed GMPics?

Page 75

1 **A. Yes.**
 2 Q. Can we move on then -- and we can put that file away,
 3 thank you -- to the briefing of the TAC adviser for the
 4 operation with which we are concerned. Can we look in
 5 your file 1, please, at tab 21.
 6 Is this the tactical firearms commander's policy
 7 file and decision log?
 8 **A. Yes.**
 9 Q. Yes?
 10 **A. Yes, sir.**
 11 Q. Can we look, please, at page 369.
 12 Can we see, as we have noted a moment ago, that you
 13 gave a briefing to Chief Inspector Lawler at 12.30 on
 14 the 1st?
 15 **A. Yes.**
 16 Q. Then look in file 2 at tab 22.
 17 **A. Yes.**
 18 Q. This is the tactical adviser's log for the same
 19 deployment, Inspector Fitton's, yes?
 20 **A. Yes.**
 21 Q. Then if we look at page 2925, there is a briefing at
 22 12.30 by you.
 23 **A. Yes.**
 24 Q. So, for the deployment on the 1st, you briefed the
 25 silver and the TAC at the same time, is that right?

Page 76

<p>1 A. Yes.</p> <p>2 Q. Was that in person?</p> <p>3 A. Yes, that was the one I mentioned earlier -- myself,</p> <p>4 Debbie Hurst, the surveillance officer.</p> <p>5 Q. Yes. So you attended at Openshaw, is that right?</p> <p>6 A. Yes.</p> <p>7 Q. And you, your deputy, somebody from surveillance and the</p> <p>8 silver and the TAC were there?</p> <p>9 A. Yes.</p> <p>10 Q. How long did that last?</p> <p>11 A. I didn't know at the time that Mr Heywood's -- but</p> <p>12 I think it was the conversation with Mr Heywood would</p> <p>13 have been either right at the end of that or very</p> <p>14 shortly after that.</p> <p>15 Q. Right. What did you understand the purpose of having</p> <p>16 the TAC adviser -- sorry, that is repetitious, TAC</p> <p>17 adviser -- the TAC in the briefing was?</p> <p>18 A. I get briefed in terms -- well, they need to know what</p> <p>19 the information is so that they can discuss the tactics</p> <p>20 in relation to whatever it is that they are going to</p> <p>21 be -- so, for example, the location, they need to know</p> <p>22 that type of thing because there is a variety of tactics</p> <p>23 that they might want too use.</p> <p>24 Q. So was that the usual way it happened --</p> <p>25 A. Again, not always. Sometimes you had a TAC there,</p> <p style="text-align: center;">Page 77</p>	<p>1 K/1245.</p> <p>2 A. Yes.</p> <p>3 Q. Just so that you can orientate yourself, you will be</p> <p>4 very familiar with this, the entry starts on 1244 for</p> <p>5 2 March and goes on to 1245. At 7.05:</p> <p>6 "Contact Superintendent Mark Granby, duty silver</p> <p>7 cadre, and brief re Op Shire and new intelligence. He</p> <p>8 is going to seek authority from either ACC Steve Heywood</p> <p>9 or ACC Terry Sweeney."</p> <p>10 Then is that "Required me to contact TAC"?</p> <p>11 A. Yes.</p> <p>12 Q. So you spoke to Mr Granby alone without the TAC on the</p> <p>13 other end of the phone?</p> <p>14 A. Yes.</p> <p>15 Q. And he required you to contact the TAC?</p> <p>16 A. Yes.</p> <p>17 Q. You said to us a moment ago that it was not your</p> <p>18 responsibility to contact the TAC. Is that why that is</p> <p>19 written that way, "Required me"?</p> <p>20 A. Well, he required me to contact him. Basically I was</p> <p>21 passing the message to say "Can you ring Mr Lawler back</p> <p>22 and it looks like you are going to need some resources</p> <p>23 tomorrow."</p> <p>24 Q. Okay, it was not to brief them?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 79</p>
<p>1 sometimes you didn't. With Mr Ellison, I don't think</p> <p>2 there was a TAC adviser for that one. So, again,</p> <p>3 I don't know the rationale behind that, whether there</p> <p>4 was a rationale behind it, but sometimes you did and</p> <p>5 sometimes you didn't.</p> <p>6 Q. When there wasn't a TAC there, and you were making your</p> <p>7 pitch as we have described it --</p> <p>8 A. Yes.</p> <p>9 Q. That may be a bit of an unfair description, you were</p> <p>10 setting out your case for the necessity of deployment of</p> <p>11 armed officers.</p> <p>12 A. Yes.</p> <p>13 Q. When the TAC wasn't there, was there then</p> <p>14 a responsibility on you to brief the TAC?</p> <p>15 A. No.</p> <p>16 Q. Who did that responsibility fall to?</p> <p>17 A. That is the TFC.</p> <p>18 Q. The silver?</p> <p>19 A. Yes, sorry, the silver.</p> <p>20 Q. But here the silver and the TAC are receiving the same</p> <p>21 intelligence from you at the same time?</p> <p>22 A. Yes.</p> <p>23 Q. Can I turn to see what happened, then, on the next day,</p> <p>24 on 2 March. We need to look at, I am afraid, some other</p> <p>25 documents to do this, starting with your casebook at</p> <p style="text-align: center;">Page 78</p>	<p>1 Q. So you understood that Mr Granby was going to do the</p> <p>2 briefing of the TAC?</p> <p>3 A. Yes.</p> <p>4 Q. Then at 19.40 you contacted an inspector who was a TAC</p> <p>5 adviser and provided details regarding the deployment,</p> <p>6 yes?</p> <p>7 A. Yes.</p> <p>8 Q. The redacted name there, that is not Sergeant Steve</p> <p>9 Allen, or who we are calling Y19, any of the TAC</p> <p>10 advisers that were on duty on 3 March, is it?</p> <p>11 A. No, they have a duty rota --</p> <p>12 Q. Inspector?</p> <p>13 A. Yes, or sergeants do it as well, I think. So he was the</p> <p>14 duty one who was available to ring.</p> <p>15 Q. So you were just telling the duty inspector TAC adviser</p> <p>16 to note that there was going to be a deployment and you</p> <p>17 might need to provide a bit of resource?</p> <p>18 A. Yes, because we was going into -- at this point we were</p> <p>19 then going into a weekend.</p> <p>20 Q. So you were not briefing up a TAC adviser at that stage?</p> <p>21 A. No.</p> <p>22 Q. Okay.</p> <p>23 A. I am not trained to do that.</p> <p>24 Q. Did you ever brief a tactical adviser on this operation?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 80</p>

1 Q. Okay.

2 **A. That is kind of the tactical decisions around whatever**

3 **tactics we are going to use --**

4 Q. We had seen the previous day that you had briefed

5 a tactical adviser about the intelligence?

6 **A. Yes, if we are doing it jointly, with a TFC, then yes,**

7 **they would be there but, no, you would never do it**

8 **individually.**

9 Q. Okay. Can we look, please, in your volume 1 at tab 17.

10 **A. Yes.**

11 Q. This is the TAC adviser's policy log --

12 **A. Yes.**

13 Q. -- for this deployment.

14 **A. Yes.**

15 Q. -- in the name initially of Sergeant Allen and then Y19,

16 who were the two TAC advisers.

17 **A. Yes.**

18 Q. If we look, please at page 483 --

19 **A. Yes.**

20 Q. -- can we see their first entry in relation to

21 information and intelligence is at 05.00 on the morning

22 of the 3rd?

23 **A. Yes.**

24 Q. It says, "See attached briefing TFC Granby".

25 **A. Yes.**

Page 81

1 Q. Then another entry at 3.15 in the afternoon:

2 "Intelligence as per TFC and SIO briefing and policy

3 logs."

4 **A. Yes.**

5 Q. "Threat assessment remains as per briefing document, as

6 does working strategy attached."

7 That is their only note of the intelligence?

8 **A. Yes.**

9 Q. So on the face of this, there is no record of them

10 receiving the intelligence that you had provided to

11 Mr Granby?

12 **A. No, Mr Granby had done that either that night or the**

13 **following morning.**

14 Q. Do you know which it was?

15 **A. No.**

16 Q. Their first entry is at --

17 **A. 05.00.**

18 Q. -- 5.00 in the morning. I am just trying to discover

19 whether Mr Sweeney, the ACC who granted an authority at

20 8.50 pm on Friday the 2nd and approved the tactical

21 parameters that Mr Granby had suggested and approved the

22 working strategy that Mr Granby had suggested, at that

23 time whether a tactical adviser had had any input at all

24 into the decision making?

25 **A. I don't know. I don't know. Does Mr Granby's log not**

Page 82

1 **make reference to --**

2 Q. No.

3 **A. Right. I can't help you in that regard then.**

4 Q. Did you brief Mr Allen or Y19 on the 3rd at all?

5 **A. The one in the afternoon -- well, I remember him coming**

6 **into the ops room.**

7 Q. Which ops room is this?

8 **A. Sorry, this is the ops room at Openshaw in the DSU.**

9 **I had been in there all the way through the morning into**

10 **the afternoon, and Mr Granby had actually been across at**

11 **the firearms. They are on the same floor but just at**

12 **the opposite end of the building. But I remember when**

13 **the new TAC had come on duty --**

14 Q. Y19?

15 **A. Yes, so he would have been given some kind of briefing.**

16 **I can't remember what it was, and the morning one, which**

17 **I don't remember as clearly, I do remember being across**

18 **in the firearms side of Openshaw where I had to discuss**

19 **the tipping points. Well, actually I had to look on the**

20 **screen at the tipping points, but we are going to come**

21 **to that.**

22 Q. Yes. Was there a tactical adviser there?

23 **A. There may have been. I can't remember who was there.**

24 Q. What I am not necessarily interested in is whether you

25 might have been in the same room as another tactical

Page 83

1 adviser at any stage; it is whether you provided

2 a briefing to go a tactical adviser?

3 **A. I don't remember sitting down and doing a full --**

4 **I wouldn't have been able, I wouldn't have had the time**

5 **to do a full briefing.**

6 Q. We know that Mr Allen and Y19 were not present during

7 the morning briefing at 5.57?

8 **A. Okay.**

9 Q. Because we have got the roll call, all right?

10 **A. Right, yes.**

11 Q. So I am just trying to discover --

12 **A. Yes, and I am trying to help as well. There were people**

13 **there, definitely.**

14 Q. What do you mean there were people there?

15 **A. Within the Tactical Firearms Unit, there were people**

16 **there, whilst we were speaking to Mark Granby.**

17 **Because of the nature of what we needed to discuss,**

18 **we had to be careful in terms of what we could say. It**

19 **was important that I looked at the screen in relation to**

20 **the tipping points but I don't remember particularly**

21 **sitting down and having --**

22 Q. A formal briefing?

23 **A. -- another briefing, no.**

24 Q. The only reason for asking, if you look at tab 1 of your

25 bundle there, at page 2, which is your witness statement

Page 84

<p>1 of 30 May 2012, tab 1, page 2.</p> <p>2 A. Yes.</p> <p>3 Q. At the second paragraph from the bottom, you say:</p> <p>4 "The last phase of Op Shire involved a pre-planned</p> <p>5 firearms operation and as such that had a specific risk</p> <p>6 assessment for that activity. A silver firearms</p> <p>7 commander was appointed and I briefed them together with</p> <p>8 the tactical adviser on the intelligence gathered during</p> <p>9 the operation."</p> <p>10 A. Yes.</p> <p>11 Q. I am trying to establish when you briefed the SFC</p> <p>12 together with the tactical adviser?</p> <p>13 A. That was Andy Fitton and Mike Lawler. Sorry, when you</p> <p>14 talk about the last phase, the last phase is those last</p> <p>15 couple of days in -- well, the first couple of days in</p> <p>16 March but last couple of days of the operation.</p> <p>17 Q. Right, so we are not to interpret this sentence as</p> <p>18 meaning the deployment on the 3rd that led to the death</p> <p>19 of Mr Grainger?</p> <p>20 A. No.</p> <p>21 Q. Why were you talking about a different deployment and</p> <p>22 not the one that led to the death of Mr Grainger?</p> <p>23 A. When I say the last phase, if I would have said the last</p> <p>24 day, or -- we have kind of touched on it a few times in</p> <p>25 terms of my comprehension skills, maybe, but I am</p> <p style="text-align: center;">Page 85</p>	<p>1 Q. How were you told that DC Lapniewski was no longer the</p> <p>2 SPOC?</p> <p>3 A. Sorry. I don't know. I think Debbie must have asked at</p> <p>4 some point, sorry, DS Hurst must have asked at some</p> <p>5 point for a profile or -- I can't remember but there</p> <p>6 would have been some occasion where Simon has not been</p> <p>7 able to assist us and we have had to utilise somebody</p> <p>8 else.</p> <p>9 Q. Was a different SPOC appointed or not?</p> <p>10 A. Not, I don't think, from the intelligence development</p> <p>11 unit but I think one was appointed from the intelligence</p> <p>12 collection unit.</p> <p>13 Q. Yes. You asked subsequently for a subject profile to be</p> <p>14 obtained for Anthony Grainger.</p> <p>15 A. Yes.</p> <p>16 Q. DS Hurst went to DS Kelly to ask him for it.</p> <p>17 A. Yes.</p> <p>18 Q. By that time, 7 February, does it follow that</p> <p>19 DC Lapniewski was no longer in position as the SPOC</p> <p>20 within the intelligence developments section?</p> <p>21 A. Yes. Yes.</p> <p>22 Q. You had said previously, we had looked in your</p> <p>23 investigative assessment, that he was to manage the</p> <p>24 intelligence flow?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 87</p>
<p>1 talking here about the last phase in terms of those last</p> <p>2 few days.</p> <p>3 Q. So you briefed them together, as we have seen for the</p> <p>4 1st, but not for the 2nd/3rd?</p> <p>5 A. I don't remember doing it. I may have spoken to them</p> <p>6 briefly, but I don't remember doing.</p> <p>7 Q. Can I turn more generally, please, to intelligence</p> <p>8 collection, analysis and dissemination.</p> <p>9 A. Yes.</p> <p>10 Q. For how long on your understanding was DC Lapniewski the</p> <p>11 nominated SPOC?</p> <p>12 A. I think it was probably up to maybe Christmas, or there</p> <p>13 or thereabouts. We had a number of incidents within</p> <p>14 Salford, shooting incidents, murders, et cetera, so and</p> <p>15 I think that is what then kind of prevented him being</p> <p>16 the SPOC.</p> <p>17 Q. When was that?</p> <p>18 A. Back end of -- maybe early part of January?</p> <p>19 Q. So in early January?</p> <p>20 A. Yes.</p> <p>21 Q. How was that notified to you?</p> <p>22 A. In terms of me being aware of it?</p> <p>23 Q. Yes, how were you told?</p> <p>24 A. Well, I worked in the serious and organised crime group,</p> <p>25 so I knew that we had lots of ongoing investigations.</p> <p style="text-align: center;">Page 86</p>	<p>1 Q. Who managed the intelligence flow after he ceased to be</p> <p>2 the SPOC?</p> <p>3 A. DC Gillian Lee.</p> <p>4 Q. She was from a different section to him?</p> <p>5 A. Yes, directly from the Intelligence Coordination Unit.</p> <p>6 Q. Was anyone from the intelligence development section</p> <p>7 managing the intelligence flow?</p> <p>8 A. I don't think they give us anybody -- well, they didn't</p> <p>9 need to, did they, because I had somebody in the</p> <p>10 Intelligence Coordination Unit? So I didn't need to</p> <p>11 have somebody from the IDU, as well.</p> <p>12 Q. What was the difference in their function?</p> <p>13 A. The Intelligence Collection Unit would automatically</p> <p>14 send the intelligence logs through to either myself or</p> <p>15 to DS Hurst.</p> <p>16 Q. Had they been doing that before DC Lapniewski had</p> <p>17 stopped being the SPOC?</p> <p>18 A. Some had, some hadn't.</p> <p>19 Q. What was the purpose of the intelligence chronology?</p> <p>20 A. It is -- the purpose of it was to get it into a format</p> <p>21 where I didn't have to have a pile of COPUs building up</p> <p>22 and building up.</p> <p>23 Q. So what, to reduce to an easily readable format in</p> <p>24 logical order?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 88</p>

<p>1 Q. Chronological order?</p> <p>2 A. Yes.</p> <p>3 Q. That are easily accessible, the intelligence that you</p> <p>4 were being provided with?</p> <p>5 A. Yes.</p> <p>6 Q. Okay.</p> <p>7 You have said, in some of your documents and in oral</p> <p>8 evidence a couple of times already, that only the</p> <p>9 intelligence that related to the specific subjects would</p> <p>10 be referred to or passed on to TFCs.</p> <p>11 A. Yes.</p> <p>12 Q. Is that right?</p> <p>13 A. That's correct.</p> <p>14 Q. Looking at an example of the intelligence chronology,</p> <p>15 I wonder whether we could look at your volume 1, at</p> <p>16 tab 16, at page 439. You remember earlier we had</p> <p>17 an exchange about whether the intelligence chronology</p> <p>18 was tucked in behind Mr Lawler's log, and I said, "Yes,</p> <p>19 it was", then you asked Mr Granby's. Looking at it, it</p> <p>20 looks like he had a copy as well, because this is tucked</p> <p>21 in behind his log too.</p> <p>22 A. Okay.</p> <p>23 Q. I am going to use this one as an example, just because</p> <p>24 it is in volume 1.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 89</p>	<p>1 to target, including an unknown bank or building society</p> <p>2 in Bury New Road, Prestwich Manchester."</p> <p>3 Q. Next to the number 5 is the COPU reference number, under</p> <p>4 the black, and the intelligence rating.</p> <p>5 A. Sorry, there is one above that.</p> <p>6 Q. Just deal with my question at the moment.</p> <p>7 A. Sorry.</p> <p>8 Q. Did you give them the COPU reference number or not?</p> <p>9 A. They had it.</p> <p>10 Q. Is it they had it in -- how? Because they had this</p> <p>11 document?</p> <p>12 A. Yes, if you are saying he has already had that, then</p> <p>13 I wouldn't have --</p> <p>14 Q. I am talking about you briefing them on the telephone.</p> <p>15 A. On the telephone to Mr Granby.</p> <p>16 Q. Yes.</p> <p>17 A. Yes, that is what I said to you, I don't remember if</p> <p>18 I did or if I didn't give the rating of it, and I don't</p> <p>19 remember if I give it verbatim or not. I possibly</p> <p>20 wouldn't have done.</p> <p>21 Q. We know that Mr Granby subsequently got hold of this</p> <p>22 how, and we will investigate how he did, but when you</p> <p>23 spoke to him at 7.05, on the evening of the 2nd --</p> <p>24 A. He didn't have this.</p> <p>25 Q. -- he didn't have it, which is why I am asking you</p> <p style="text-align: center;">Page 91</p>
<p>1 Q. You, I think, came to the Inquiry yesterday with</p> <p>2 an original print of the intelligence log marked up with</p> <p>3 the entries that you had passed on --</p> <p>4 A. Yes.</p> <p>5 Q. -- to Mr Granby --</p> <p>6 A. Yes.</p> <p>7 Q. -- on the 2nd and Mr Lawler on the 1st?</p> <p>8 A. Yes.</p> <p>9 Q. Was it the same on each occasion?</p> <p>10 A. Yes.</p> <p>11 Q. Can you, by reference to this log, identify which of</p> <p>12 them you passed on?</p> <p>13 A. Yes, so the first one is item 5. This one I've got is</p> <p>14 really heavily redacted.</p> <p>15 Q. It is.</p> <p>16 A. Right. So is it only going to have the ones that I need</p> <p>17 to refer to?</p> <p>18 Q. I am hoping that it does.</p> <p>19 A. So the first one is item 5, which is on page 440.</p> <p>20 Q. Just read out what that says, please.</p> <p>21 A. "A team of individuals, which includes David Totton and</p> <p>22 Robert Rimmer, are actively involved in the commission</p> <p>23 of armed robbery offences at banks, building societies</p> <p>24 and other premises where large sums of cash are kept.</p> <p>25 This team are currently assessing a number of premises</p> <p style="text-align: center;">Page 90</p>	<p>1 whether you gave him the rating; do you understand?</p> <p>2 A. Yes, I do understand. Yes.</p> <p>3 Q. You were about to say, in fact, there is one above it,</p> <p>4 item 4; did you read that one to him or tell him about</p> <p>5 that one?</p> <p>6 A. Yes.</p> <p>7 Q. So that is in fact number 1, is it?</p> <p>8 A. Yes, it was.</p> <p>9 Q. Number 2 then is item 5?</p> <p>10 A. Yes.</p> <p>11 Q. Yes. What is the third one?</p> <p>12 A. Number 23.</p> <p>13 Q. Number 23, that is number 3, yes, and if you read that</p> <p>14 one for us, please.</p> <p>15 A. "David Totton and Robert Rimmer are committing robbery</p> <p>16 offences where they follow security guards and attack</p> <p>17 them at the banks."</p> <p>18 Q. Okay, and number 4, please?</p> <p>19 A. That is number 36, on 445.</p> <p>20 Q. Yes.</p> <p>21 A. "David Totton and associates recently visited Thailand."</p> <p>22 Q. Number 5, please.</p> <p>23 A. On page 446, number 40:</p> <p>24 "Intelligence indicates that David Totton may be</p> <p>25 seeking to obtain a passport using false documents."</p> <p style="text-align: center;">Page 92</p>

1 Q. Did you provide number 6?
 2 **A. Yes. Item 41.**
 3 Q. Yes.
 4 **A. "A team of individuals, which is headed by David Totton,**
 5 **are actively involved in the commission of armed robbery**
 6 **offences at banks, building societies and other premises**
 7 **where large sums of cash are kept. David Totton is**
 8 **planning to commit offences of robbery with his close**
 9 **friend Idgy and others, including Anthony Grainger and**
 10 **twin brothers known as Aaron and Bradley. David Totton**
 11 **is also heavily involved in the large scale movement of**
 12 **cocaine with a criminal associate known as Rimmer."**
 13 Q. Just going back then to page 443, item 21 --
 14 **A. Yes.**
 15 Q. -- you did not read that or give the intelligence in it
 16 to Mr Granby?
 17 **A. No.**
 18 Q. Is that because it related to the Corkovics?
 19 **A. Yes, purely to that.**
 20 Q. You can see that the second paragraph of that contains
 21 some significant information:
 22 "It is known that the driver of the car that is used
 23 during the commission of any offence is normally in
 24 possession of a handgun in order to warn off any
 25 uniformed police patrols."
 Page 93

1 **A. Yes.**
 2 Q. That wasn't provided to silver on the 2 March --
 3 **A. No.**
 4 Q. -- or subsequently.
 5 **A. No it wasn't.**
 6 Q. And that is because of the split, and it relates to the
 7 Corkovics and not Mr Totton, Mr Grainger or Mr Rimmer?
 8 **A. That's correct.**
 9 Q. In relation to item 41, if we can turn to that, please.
 10 THE CHAIRMAN: Are you going to deal with that in detail?
 11 MR BEER: I wasn't going to.
 12 THE CHAIRMAN: Fine. It is missing from my bundle, that is
 13 all.
 14 MR BEER: I am so sorry. It is missing from your bundle?
 15 THE CHAIRMAN: Yes.
 16 MR BEER: What, page 443?
 17 THE CHAIRMAN: A series of pages. I can manage if you are
 18 not going to deal with it in detail but we can have the
 19 bundle checked over the short adjournment.
 20 MR BEER: I am not going to deal with it in any detail. Is
 21 page 446 in your bundle, sir?
 22 THE CHAIRMAN: No.
 23 MR BEER: Then that is a problem. We can look in ... I just
 24 want to try and use this one, please. Tab 16. We are
 25 just going to substitute yours, sir. It is in about 20
 Page 94

1 places in the bundle, so we could go to lots of bundles,
 2 but we are here.
 3 THE CHAIRMAN: Yes, quite. The easiest thing is if I could
 4 have pages 442 to 475 inclusive, because I have
 5 annotated other parts of my tab 16, and if I can just
 6 put in those missing pages, that will be fine.
 7 MR BEER: 442 to 475?
 8 THE CHAIRMAN: Yes.
 9 MR BEER: 442 to 475.
 10 (Handed)
 11 THE CHAIRMAN: Thank you very much.
 12 MR BEER: Can we just track back a little bit there, for the
 13 Chairman's benefit, please.
 14 **A. Yes.**
 15 Q. On 443, item 21 --
 16 **A. Yes.**
 17 Q. -- you didn't provide that to Mr Granby?
 18 **A. No.**
 19 Q. Because it related to the Corkovics; yes?
 20 **A. Yes.**
 21 Q. Over the page, to 444 --
 22 **A. Yes.**
 23 Q. -- at the top, that is the third item that you provided.
 24 **A. Yes.**
 25 Q. Over the page to 445, item 36, is the fourth item you
 Page 95

1 provided? And then over the page, to 446, they are the
 2 fifth and sixth items that you provided?
 3 **A. Yes.**
 4 MR BEER: Sir, I was now going to deal with item 41, that
 5 might be a convenient moment.
 6 THE CHAIRMAN: It might be a convenient point at which to
 7 break off anyway. Thank you. 2.05.
 8 MR BEER: Thank you.
 9 (12.59 pm)
 10 (The Luncheon Adjournment)
 11 (2.05 pm)
 12 THE CHAIRMAN: Yes, Mr Beer.
 13 MR BEER: Mr Cousen, we were looking, or about to look, at
 14 item 41 on the intelligence chronology, which is your
 15 volume 1, tab 16, at page 446.
 16 **A. Yes.**
 17 Q. I am going to ask some relatively detailed questions on
 18 this.
 19 **A. Okay.**
 20 Q. And understand your then interpretation of it.
 21 **A. Yes.**
 22 Q. Can you see that it is effectively divided into three
 23 sentences? I am going to call them (1), (2) and (3).
 24 **A. Yes.**
 25 Q. The first sentence is:
 Page 96

1 "A team of individuals ..."
 2 And ends with:
 3 "... are kept."
 4 The second sentence begins with (1):
 5 "(1) David Totton is planning ..."
 6 **A. Yes.**
 7 Q. And the third sentence begins with the number (2):
 8 "(2) David Totton is also heavily involved in ..."
 9 Yes?
 10 **A. Yes.**
 11 Q. Did you interpret these three sentences as separate
 12 items about different subject matters?
 13 **A. Two separate items.**
 14 Q. Not three separate items?
 15 **A. No.**
 16 Q. The two separate items, are they sentences one and two
 17 on the one hand, and sentence three on the other?
 18 **A. Yes.**
 19 Q. So, the third sentence is about the importation of
 20 cocaine?
 21 **A. Yes, the large scale movement. Yes.**
 22 Q. Yes, the large scale movement of cocaine. The second is
 23 about the planning of robbery offences, and the first is
 24 about the commission of robbery offences; yes?
 25 **A. Sorry, so the first one is the sentence all the way to**

Page 97

1 **where it comes to number 2, that is one. And then the**
 2 **second is -- yes, David Totton and the drugs.**
 3 Q. Okay.
 4 I think it is right that you haven't suggested that
 5 the third sentence there, "David Totton is also heavily
 6 involved in the large scale movement of cocaine", is the
 7 activity that Mr Totton, Grainger and Rimmer were
 8 engaged in on the evening of the 3rd; is that right?
 9 **A. That's correct.**
 10 Q. Can I just compare the first two sentences of the
 11 document, please?
 12 **A. Yes.**
 13 Q. The first sentence, do you see, is about individuals
 14 being actively involved in the commission of offences;
 15 can you see that?
 16 **A. Yes.**
 17 Q. "A team of individuals headed by David Totton is
 18 actively involved in the commission of armed robbery
 19 and ..."
 20 **A. Yes.**
 21 Q. Then, the second sentence is:
 22 "David Totton is planning to commit offences of
 23 robbery with his close friend Idgy and others, including
 24 Anthony Grainger and twin brothers known as Aaron and
 25 Bradley."

Page 98

1 **A. Yes.**
 2 Q. Did you interpret the second sentence to be about
 3 a different scheme than the first; the first being about
 4 actively involved in committing offences, and the second
 5 being about planning only?
 6 **A. No.**
 7 Q. Why not?
 8 **A. Because, if you see, it is redacted on your copy there,**
 9 **but the two small boxes -- so after the long sentence,**
 10 **the first sentence, before the number (2) --**
 11 Q. Yes.
 12 **A. That there then is an intelligence rating, so you get**
 13 **one -- it is not split up in the middle. And then right**
 14 **at the end of the second one is another intelligence**
 15 **rating.**
 16 Q. I understand what you are saying, that there are two
 17 intelligence ratings there; how did that help you to
 18 believe that all of the information, that came before
 19 the first intelligence rating, was talking about the
 20 same activity?
 21 **A. Because if it was different, at the end of that first**
 22 **sentence, before it says, "Number (1) David Totton ..."**
 23 **there would be another B25 there.**
 24 Q. Why would that be? Because assume the rating was the
 25 same but it was talking about two different things, you

Page 99

1 could have the same rating about two different
 2 enterprises, just because there is not the rating
 3 repeated.
 4 **A. No. Bear in mind, I had previously been, for a short**
 5 **time, in that world as well. If you were separating the**
 6 **intelligence, you would separate it because there would**
 7 **be a different -- even if it was the same rating, you**
 8 **would still separate it if that had been received and**
 9 **was different to that piece of intelligence. Otherwise**
 10 **that would be misleading.**
 11 Q. So this is what, repetitious then, sentences one and
 12 two, but slightly differently expressed?
 13 **A. Well, it is slightly different, isn't it, the sentence?**
 14 Q. They contain different things, don't they?
 15 **A. Yes.**
 16 Q. The first sentence says it is going to be an armed
 17 robbery and the second doesn't?
 18 **A. Yes.**
 19 Q. The first sentence doesn't name the individuals, other
 20 than David Totton, whereas the second one does.
 21 **A. Yes.**
 22 Q. The first one is about committing armed robberies,
 23 actively involved in armed robberies, the second one is
 24 about planning them.
 25 **A. Yes.**

Page 100

1 Q. So what did you take from it, or didn't you analyse it
 2 with the kind of detail that I am applying to it now?
 3 **A. I didn't go into the detail that you are putting into it**
 4 **now.**
 5 Q. What did you take from it?
 6 **A. Exactly as it said there, that David Totton was involved**
 7 **in the commission of armed robbery offences at banks,**
 8 **building societies and other premises where large sums**
 9 **of cash are kept. And, in addition to that, there he is**
 10 **planning to commit offences of robbery with his close**
 11 **friend Idgy and others, including Anthony Grainger and**
 12 **other twin brothers Aaron and Bradley.**
 13 Q. You didn't see that one referred to Totton with some
 14 individuals, who weren't known, committing armed
 15 robberies and then Totton, in the future, planning to
 16 commit robberies with some people that were known but
 17 that wasn't said to be armed; do you see the difference
 18 between them?
 19 **A. Yes, I have not broken it down because it has not been**
 20 **split.**
 21 Q. But they are two different things there, aren't they?
 22 When you look at it, one is talking about being actively
 23 involved, ie what is going on currently, and one is
 24 looking at the future, isn't it?
 25 **A. Well, it says, "Planning to commit offences of robbery".**

Page 101

1 Q. But not armed robbery.
 2 **A. Well, it is all coming on the same log. The fact is, it**
 3 **is saying:**
 4 **"A team of individuals which is headed by**
 5 **David Totton are actively involved in the commission of**
 6 **armed robbery offences at banks, building societies and**
 7 **other premises."**
 8 **So that is not saying, "Historically", it has**
 9 **happened in the past.**
 10 Q. No, it is happening now.
 11 **A. Yes.**
 12 Q. And one is saying, "Looking at the future", they are
 13 planning to.
 14 **A. Well, the way that has been graded and the way that**
 15 **I have received that is as I have just explained.**
 16 Q. Okay.
 17 The first sentence appears to be a repetition of
 18 items 21 and 5 on the chronology, if we go back to --
 19 sorry, number 5 on the chronology:
 20 "A team of individuals, which is headed by
 21 David Totton, are actively involved in the commission of
 22 armed robbery offences at banks, building societies and
 23 other premises where large sums of cash are kept."
 24 **A. Yes.**
 25 Q. The phraseology is the same as number 5; can you see

Page 102

1 that? There is a name of Robert Rimmer included there,
 2 and it says, "Armed robberies", but the, "At banks
 3 building societies and other premises where large sums
 4 of cash are kept" is that a --
 5 **A. Sorry, where is the reference to Robert Rimmer?**
 6 Q. Item 5.
 7 **A. Sorry, I am on 21.**
 8 Q. Item 5.
 9 **A. Sorry. Yes.**
 10 Q. Item 21, the Corkovics are mentioned.
 11 **A. Sorry, yes.**
 12 Q. Is that sort of a standard form of words that is used?
 13 **A. That is --**
 14 Q. It is just that they are the same words but with
 15 different names inserted?
 16 **A. Well, you can --**
 17 Q. Is that a common form when speaking about robbery, that
 18 you receive?
 19 **A. It can be. Yeah, it can be. It depends how much**
 20 **information is known and how much can be disseminated.**
 21 **Obviously there will be a much bigger log that sits**
 22 **behind the back of this, which for whatever reason that**
 23 **cannot be disseminated.**
 24 Q. The second sentence in paragraph 41, or item 41, I don't
 25 think had appeared before in that format, had it?

Page 103

1 **A. No. No, because that is the only log that mentions**
 2 **Anthony.**
 3 Q. The intelligence in item 5:
 4 "A team of individuals, including David Totton,
 5 Robert Rimmer, are actively involved in the commission
 6 of armed robberies."
 7 **A. Yes.**
 8 Q. In late 2011, that was received.
 9 **A. Yes.**
 10 Q. By early March 2012, two or so months had elapsed,
 11 hadn't they?
 12 **A. From?**
 13 Q. Late 2011 to 3 March 2012, at least two months had
 14 elapsed.
 15 **A. Yes.**
 16 Q. In the period between 19 October 2011 and 3 March 2012,
 17 I think the DSU had been deployed some 74 times.
 18 **A. Not on David Totton, no.**
 19 Q. No, on -- including on the Corkovic brothers; yes?
 20 **A. Yes, but on David Totton and Robert Rimmer it was**
 21 **probably 20 -- was it 22 or 23 in total?**
 22 Q. Yes, that sounds about right.
 23 **A. Yes.**
 24 Q. You had vehicle tracking devices on the BMW and then the
 25 red Audi.

Page 104

1 **A. Yes.**
 2 Q. That enabled officers to know, after the download, where
 3 the vehicles had been at all times?
 4 **A. Yes.**
 5 Q. Did any of the evidence from the surveillance indicate
 6 that they had been actively involved in the commission
 7 of robberies? Actually committed robberies?
 8 **A. No, we would have -- if that had been the case, they**
 9 **would have been arrested.**
 10 Q. So it was, in that time, suspected that they were
 11 planning or preparing but not actually committing
 12 robberies?
 13 **A. Conducting reconnaissance, yes.**
 14 Q. Does it follow that the entry, number 5, that they are
 15 actively involved in committing armed robbery offences,
 16 by March 2012, did you think that it was incorrect, was
 17 wrong, out of date?
 18 **A. No, because by then, obviously, we had already had**
 19 **the January trips to Stoke-on-Trent, two stolen vehicles**
 20 **on false plates, people trying to conceal their**
 21 **identity, going to the G4S depot around that area and**
 22 **then -- obviously then there had been a period of time**
 23 **when there had not been as much activity, so they went**
 24 **to the St Helens area, which, again, it was believed**
 25 **that that was reconnaissance in the St Helens area,**

Page 105

1 **which was about 21, 22 February. So, no, in answer to**
 2 **your question.**
 3 Q. You didn't think that what had been provided, in item 5,
 4 hadn't been borne out by the surveillance activity that
 5 had occurred?
 6 **A. No.**
 7 Q. The surveillance activity that had occurred, would you
 8 agree that by 3 March, in the recent evenings, the
 9 subjects had been to Culcheth four times?
 10 **A. By the 3rd or on the 3rd?**
 11 Q. By the 3rd, this was their fifth trip.
 12 **A. Yes, five out of six days.**
 13 Q. Yes. Looking at the surveillance evidence alone,
 14 excising everything else from the picture, it was not
 15 clear from the surveillance evidence alone that this
 16 would be a robbery rather than, for example, a fifth
 17 recce?
 18 **A. Well, from the surveillance evidence alone, no.**
 19 Q. From the surveillance evidence alone, it wasn't clear
 20 that the men going to Culcheth were going to commit
 21 a robbery rather than some other form of serious
 22 criminality?
 23 **A. Well, from the surveillance evidence alone, no.**
 24 Q. I think it is right that on previous occasions that you
 25 believe to be recces, they wore similar clothing to that

Page 106

1 which was worn on the night of the 3rd; dark or
 2 anonymous clothing?
 3 **A. Yes.**
 4 Q. And gloves.
 5 **A. Yes.**
 6 Q. And they had not committed a robbery on those occasions?
 7 **A. No.**
 8 Q. Similarly, the surveillance that had occurred before
 9 then didn't suggest in any way that Mr Grainger would be
 10 armed?
 11 **A. No, from surveillance, no.**
 12 Q. Nor the other subjects.
 13 **A. No.**
 14 Q. Thank you.
 15 In terms of the subject profiles --
 16 **A. Yes.**
 17 Q. -- who in your team, if anyone, was responsible for
 18 updating them?
 19 **A. Nobody.**
 20 Q. Who outside your team was responsible for updating them?
 21 **A. Nobody.**
 22 Q. If we just look at your interview, it is your volume 1,
 23 please, at tab 7.
 24 **A. Yes.**
 25 Q. This is part of the interview that was conducted for the

Page 107

1 purposes of preparing a witness statement for the
 2 defence of Sir Peter Fahy. At page 346, you are here
 3 being asked questions by Mr Foulkes about the
 4 intelligence or subject profiles, and at the foot of the
 5 page, at 04.13, he says:
 6 "Obviously you will get a copy, but then what the
 7 FIB would do is keep an intelligence chronology or keep
 8 the update of the intelligence on it and do a research
 9 package because of the restriction on staffing levels at
 10 that time."
 11 You say:
 12 "Yes."
 13 He says:
 14 "They were not in a position to do that, and you
 15 say:
 16 "Yes."
 17 He says:
 18 "So what?"
 19 You say:
 20 "From my perspective, [I'd] I wasn't aware they had
 21 said that to Debbie before."
 22 Then over the page, at 347 --
 23 **A. Yes.**
 24 Q. -- you say:
 25 "I have actually spoken to Debbie and she was not

Page 108

1 aware either that they had said about updating. It
 2 matters not if I am being honest with you."
 3 **A. Yes.**
 4 Q. So you were not aware that when they had sent through
 5 the intelligence profile for Mr Grainger, that the FIB
 6 had said that it is the Robbery Unit's responsibility to
 7 update it?
 8 **A. Well, obviously I have seen the email now, the foot of**
 9 **the email that DS Hurst had forwarded on to me but, at**
 10 **the time, it was not something that I was immediately**
 11 **raised to me by DS Hurst, but it is not something that**
 12 **we would have done in any case.**
 13 Q. Let's just try and separate those things out.
 14 **A. Okay.**
 15 Q. The email you are referring to I think is at W/238.
 16 **A. Yes.**
 17 THE CHAIRMAN: 328?
 18 MR BEER: W/238.
 19 Do you have W there?
 20 **A. No.**
 21 Q. Maybe somebody will help you?
 22 **A. Yes.**
 23 Q. This is at the foot of the page, the email from DS Kelly
 24 to DS Hurst.
 25 **A. Yes.**

Page 109

1 Q. The original of which attached the profile as a Word
 2 document.
 3 **A. Yes.**
 4 Q. Which we have elsewhere, and it says:
 5 "This is current, up to date. It includes a risk
 6 assessment and Experian checks. It was decided this
 7 morning, at the ISD pace setter meeting, that any
 8 further work required to bring the profile up to date
 9 will need to be completed by yourselves. This decision
 10 was made based on staffing levels and current
 11 workloads ... "
 12 **A. Yes.**
 13 Q. We can see, at the top of the page, she says:
 14 "Boss, for your information, I will add the profile
 15 to the S: drive."
 16 **A. Yes.**
 17 Q. Dealing with the first thing, it looks as if you were
 18 aware that FIB had said, "It is over to you".
 19 **A. Well, the emails there, in fairness to me, I will have**
 20 **opened the email. I will not have necessarily scrolled**
 21 **down the whole email to read the trail of it. The**
 22 **heading is, "Anthony Grainger profile":**
 23 **"Boss, I will add the profile to the S: drive."**
 24 **I know it is there. I don't really need to look at**
 25 **anything further.**

Page 110

1 Q. You said, when interviewed, that you had spoken to
 2 Deborah Hurst and she wasn't aware that they had said
 3 that the profile had to be updated by FR -- the Force
 4 Robbery Unit.
 5 **A. Yes.**
 6 Q. She will have to answer for that.
 7 **A. She will have to answer for that, yes.**
 8 Q. The second part of your answer was:
 9 "It doesn't matter if you are being honest anyway."
 10 **A. Yes.**
 11 Q. Why does doesn't it matter?
 12 **A. Because we had the intelligence chronology running,**
 13 **which picked up intelligence from -- well, I had started**
 14 **to get the intelligence, I think it was 30 September.**
 15 **The intelligence profile was created in September, and**
 16 **there wasn't any intelligence of relevance on Anthony**
 17 **that would have needed to have been added, so that**
 18 **anything new that would have come in was being captured**
 19 **anyway.**
 20 Q. The Operation Samana profile was provided to, as we have
 21 seen, the tactical firearms commanders --
 22 **A. Yes.**
 23 Q. -- without alteration or comment.
 24 **A. Yes.**
 25 Q. Is that because the subject profiles were a relevant

Page 111

1 document to give to them?
 2 **A. Yes.**
 3 Q. That is presumably why you sent it to them?
 4 **A. Yes.**
 5 Q. When we heard evidence from DC Talbot, last Friday, he
 6 said that subject profiles were not important documents.
 7 They were just prepared out of, really, a sense of duty
 8 to custom and practice. It is because it is what you
 9 all did, you just had to have a subject profile and that
 10 they were in fact largely irrelevant. Is that right;
 11 subject profiles are largely irrelevant?
 12 **A. I think from a detective constable's perspective, we ask**
 13 **for profiles on quite a regular basis and there might**
 14 **not necessarily be as much of an understanding in terms**
 15 **of what that profile is going to be required for, as**
 16 **I would have an understanding from the role that**
 17 **I conduct.**
 18 **So I can't answer on behalf of DC Talbot, but**
 19 **I suspect that is the point that he is coming from.**
 20 **We ask for profiles on, as I have said yesterday**
 21 **I think, on partners, on people who may only briefly**
 22 **enter an investigation, and I think sometimes the**
 23 **detectives -- the detective constables, are kind of**
 24 **wondering why we are asking. It is creating work, at**
 25 **the end of the day, and they are wondering what the**

Page 112

1 **relevance is.**
 2 Q. But for you they were an important document to be
 3 provided to firearms commanders?
 4 **A. It was a snapshot. As I mentioned yesterday, it was**
 5 **a snapshot to give me that initial kind of look at**
 6 **Anthony, having a look at David Totton, Robert Rimmer.**
 7 **There was numerous profiles created during the course of**
 8 **this operation.**
 9 Q. But we heard evidence from DC Lapniewski last week, and
 10 PC Griffiths last week. Both of them said -- and I am
 11 summarising their evidence -- that they were and would
 12 be surprised if their profiles were provided to firearms
 13 commanders or firearms officers, because that is not
 14 what they were prepared for.
 15 **A. To be fair, neither of those officers have ever held**
 16 **a position where they have been operationally in**
 17 **a position where they would know that or not.**
 18 Q. But they were saying, "We didn't know that our documents
 19 were being applied for this purpose".
 20 **A. When we applied for those documents, for this**
 21 **investigation and indeed for every investigation, at the**
 22 **outset, you don't know what it is going to be required**
 23 **for.**
 24 **So we ask for a profile, at the time there was**
 25 **numerous different types of profiles that were knocking**

Page 113

1 **about. If it was purely for an arrest, I would have had**
 2 **a document which probably had two pages, maximum. As it**
 3 **was, I got a document 20 pages long, which was actually**
 4 **rather pleasing, rather than getting something only**
 5 **a couple of pages long.**
 6 Q. So I think you are agreeing with them in the sense of
 7 saying that it is right, they didn't know that the work
 8 that they were doing might be sent off to firearms
 9 commanders and bits of it might be taken and put in
 10 a briefing to firearms officers who might take decisions
 11 whether to fire a gun or not on the basis of it?
 12 **A. Well, I would be surprised if they didn't know that.**
 13 **They have worked actually within the -- we have**
 14 **an operations room at Nexus House and the profiles are**
 15 **produced purely for that. So I would be surprised if**
 16 **they didn't, but I can't answer for them, can I? So**
 17 **I would be very --**
 18 Q. I am not asking to you answer for them. I am asking for
 19 your evidence on whether it is your belief that they
 20 knew that the profiles that they were preparing might be
 21 applied in the way that they were in this case, ie parts
 22 of them taken and used by a silver commander to make
 23 decisions to apply for an authority or not, and then
 24 parts of them taken and included in a briefing to brief
 25 firearms officers; you are saying you would be surprised

Page 114

1 if they didn't know that?
 2 **A. I would be surprised. And, in fact, I had actually**
 3 **invited DC Lapniewski to a firearms briefing, so he**
 4 **fully understood, in terms of the -- a profile that he**
 5 **had produced for the Corkovics was going to be used,**
 6 **that was on a separate briefing, but as part of this**
 7 **bridge building between ourselves and the FIB, he was**
 8 **actually invited to sit on one of those meetings. So he**
 9 **would have been fully aware because I didn't take in**
 10 **a different document to that briefing.**
 11 Q. Can we look, please, at file F/11, please. Do you have
 12 that?
 13 **A. Yes.**
 14 Q. Thank you. Can you see this is the profile described by
 15 PC Griffiths as a pen picture for Anthony Grainger?
 16 **A. Yes.**
 17 Q. Do you see, on the front of it, it says:
 18 "This intelligence document has been compiled for
 19 the purposes of dissemination to the [blank] and under
 20 no account should this document be disseminated without
 21 prior authorisation of the management of the GMP Force
 22 Intelligence Bureau."
 23 **A. Yes.**
 24 Q. Firstly, had you ever noticed that?
 25 **A. Probably not. Possibly I had, but when we get these**

Page 115

1 **documents, the documents are prepared for our operation**
 2 **and then it is deemed for the operational team, whatever**
 3 **they are needed for, they will be used for. So I would**
 4 **never go back, for example, having been presented with**
 5 **a profile, to then go back and say, "Hang on a minute,**
 6 **can I now use this to go and do X, Y and Z". I have**
 7 **never done that and none of my colleagues who have been**
 8 **in the same position as me for goodness knows how many**
 9 **years have ever done that, and we would never do that.**
 10 **That is not standard practice, at all.**
 11 Q. What is the purpose of that on the front there then, do
 12 you think, saying that you must not disseminate the
 13 contents without going back to the FIB and asking for
 14 permission?
 15 **A. I don't know.**
 16 Q. It is a bit useless then, isn't it?
 17 **A. Well, possibly, yes.**
 18 Q. But you think, once you have been given it, you can do
 19 what you like with it?
 20 **A. Not do what you like.**
 21 Q. Within reason, you cannot upload it to Facebook, but for
 22 a policing purpose?
 23 **A. Yes, within reason.**
 24 Q. Okay. So it follows that you didn't feel constrained in
 25 sending the profiles on to any other officers?

Page 116

1 **A. No.**
 2 Q. Despite what it says here?
 3 **A. No, I didn't.**
 4 Q. One reading of this is that FIB, certainly on this
 5 version of a profile, retained ownership of
 6 dissemination rights; that they could say, "Hold on
 7 a minute, it was not prepared for the purposes of
 8 briefing up firearms officers. Don't use it for that.
 9 That is not what it is there for".
 10 **A. No, that is not right.**
 11 Q. It is incorrect?
 12 **A. It is incorrect, and I think if you ask the question**
 13 **from one of the senior management within FIB, or**
 14 **somebody who works within there, they would never have**
 15 **had a request -- I am absolutely certain -- from anybody**
 16 **requesting to use a profile to go and brief a firearms**
 17 **cadre or otherwise that had been produced for them.**
 18 **They would expect you to handle the documents**
 19 **sensitively and, as you alluded to, not to be --**
 20 Q. Used for a non-policing purpose?
 21 **A. Yes.**
 22 Q. Can we look, please, at the relevant entry, at page 14,
 23 at the foot of the page, the part that is in bold and in
 24 red.
 25 **A. Yes.**

Page 117

1 Q. "Whilst there are no specific markers on PNC or OPUS
 2 regarding firearms, Grainger has been charged in the
 3 past with ..."
 4 Then that crime number is given.
 5 **A. Yes.**
 6 Q. I want to try and do as we have done with a previous
 7 witness first, a little bit of marrying up concerning
 8 the crime reports and the charges that Mr Grainger and
 9 others faced when they came to trial, before going to
 10 your GMPics document that you produced yesterday.
 11 **A. Yes.**
 12 Q. Could we take out, please, the indictment, at G2/1167.
 13 Could I ask you -- to save a bit of time -- take out
 14 of the document, out of the binder, 1167 to 1169.
 15 **A. Yes.**
 16 Q. There is a problem, Chairman?
 17 THE CHAIRMAN: Out of this bundle, I am afraid that pages
 18 1167, 8 and 9 are missing. Unless, possibly, I have
 19 removed them when we did this exercise before.
 20 Q. Yes.
 21 THE CHAIRMAN: Thank you. I have them.
 22 MR BEER: Yes.
 23 1167, please. This is an indictment and, as best as
 24 we can tell, this is an indictment that was ultimately
 25 preferred at trial, the previous version of it, having

Page 118

1 been stayed and leave given to prefer this new
 2 indictment.
 3 **A. Yes.**
 4 Q. As we can see, I think, there are four counts on the
 5 indictment: a robbery; an attempted robbery;
 6 a conspiracy to rob and a robbery. The last count being
 7 count 4, which goes on to page 1168A.
 8 What I am going to try and do is go to the crime
 9 reports, and then go to the GMPics to work out what has
 10 gone on.
 11 If we look at count 1 on the indictment, which is
 12 the substantive robbery against Peter Anderson alone, on
 13 9 October 1995, can we look, please, in file G1, at
 14 page 1163.
 15 **A. Sorry, 1163?**
 16 Q. Yes, that is obviously a rogue reference.
 17 Try G2/1163. My mistake.
 18 **A. Yes.**
 19 Q. Yes, that is much better.
 20 Now, this is a court result sheet, before we go to
 21 the crime reports for this, for Mr Anderson,
 22 Peter Anderson, and I think it shows that, at Count 1 of
 23 1, he was discharged on the direction of the judge and
 24 a defendant's costs order was made.
 25 **A. Yes.**

Page 119

1 Q. So that would appear that Mr Anderson alone appeared
 2 before the court on the charge of robbery relating to
 3 9 October 1995 and was found not guilty on the judge's
 4 direction; yes?
 5 **A. From that page, yes.**
 6 Q. Yes.
 7 Then, if we can look at Count 2 on the indictment,
 8 please, the attempted robbery.
 9 **A. Sorry, sir, does yours have any names on it? Because**
 10 **this one does not have actually any names on it.**
 11 Q. What do you mean?
 12 **A. You are saying it is Peter Anderson, mine does not**
 13 **actually show any names on this page.**
 14 Q. On which?
 15 THE CHAIRMAN: 1163.
 16 MR BEER: If you go to 1161, which is the first page of
 17 a three page document, top left, it says,
 18 "Peter Anderson".
 19 **A. Yes, thank you.**
 20 Q. If we go to Count 2 then, attempted robbery on the
 21 indictment. You can see this is against Stuart Grainger
 22 alone, on 14 November; yes? Count 2 on indictment, over
 23 the page.
 24 **A. Yes.**
 25 Q. Then, if we can look at G2/1154.

Page 120

<p>1 A. Yes.</p> <p>2 Q. 2 of 1:</p> <p>3 "Count order to remain on the file. Not to be</p> <p>4 proceeded with without leave of the court or the Court</p> <p>5 of Appeal."</p> <p>6 If you go back to 1152, you can see that is</p> <p>7 Stuart Grainger's court results sheet.</p> <p>8 A. Yes.</p> <p>9 Q. So it looks like Stuart Grainger alone appeared for the</p> <p>10 attempted robbery and it was ordered to lie on the file.</p> <p>11 A. Yes.</p> <p>12 Q. Then, Count three on the indictment, the conspiracy to</p> <p>13 rob, this is where Anthony Grainger appears. Can you</p> <p>14 see, he is charged with David Totton on Count 3?</p> <p>15 A. Yes.</p> <p>16 Q. "A conspiracy to rob on a single day, 31 May."</p> <p>17 A. Yes.</p> <p>18 Q. And --</p> <p>19 A. Sorry, sir, mine says 10 June, actually, 1996.</p> <p>20 Q. Say again?</p> <p>21 A. Mine says 10 June 1996.</p> <p>22 Q. Count 3, on page 1168?</p> <p>23 A. Yes, the very bottom one. If you go over to 1168 --</p> <p>24 THE CHAIRMAN: That is Count 4.</p> <p>25 MR BEER: That is Count 4. We are looking at Count 3, in</p> <p style="text-align: center;">Page 121</p>	<p>1 Anthony Grainger, Stuart Ellis and Peter Anderson."</p> <p>2 That is 10 June.</p> <p>3 A. Yes.</p> <p>4 Q. So everyone, apart from Stuart Grainger.</p> <p>5 A. Yes.</p> <p>6 Q. Look at the results on that, Mr Ellis, at 1157, not</p> <p>7 guilty, that was Count 4. Mr Grainger, 1160; yes?</p> <p>8 A. Yes.</p> <p>9 Q. Mr Anderson, 1163.</p> <p>10 A. Yes.</p> <p>11 Q. And Mr Totton, 1166.</p> <p>12 A. Yes.</p> <p>13 Q. I think we have a complete link between the counts on</p> <p>14 the indictment and the not guilty's, the dismissals by</p> <p>15 the judge, or the directions for the jury, and for one</p> <p>16 the lie on the file.</p> <p>17 A. Yes.</p> <p>18 Q. Can we now turn to see where the allegation on the</p> <p>19 subject profile fitted into all of that.</p> <p>20 A. Yes.</p> <p>21 Q. We saw the crime reference number, which was I think</p> <p>22 243085B of 95.</p> <p>23 A. Hmm.</p> <p>24 Q. If we look, please, at the crime report -- do you have</p> <p>25 your loose GMPics to hand?</p> <p style="text-align: center;">Page 123</p>
<p>1 the middle.</p> <p>2 A. Yes, sorry, that is correct.</p> <p>3 Q. Count 3, in the middle. It is rather confusing the way</p> <p>4 the indictment is set out. I put a set of tramlines</p> <p>5 above the words "Count 3" and above the words "Count 4"</p> <p>6 to separate them out. So it is:</p> <p>7 "David Totton and Anthony Grainger, conspiracy with</p> <p>8 others on 31 May 1996 to rob."</p> <p>9 A. Yes.</p> <p>10 Q. Then if we can look at that in the court results,</p> <p>11 please, at G2, 1166, this is for David Totton.</p> <p>12 A. Yes.</p> <p>13 Q. Can you see, on 1166, item 1 of 2, conspiracy to rob,</p> <p>14 not guilty on the judge's direction?</p> <p>15 A. Yes.</p> <p>16 Q. For Mr Grainger, Anthony Grainger, 1160 -- sorry, yes.</p> <p>17 THE CHAIRMAN: Yes. It is.</p> <p>18 MR BEER: 1160.</p> <p>19 A. Yes.</p> <p>20 Q. First item:</p> <p>21 "Conspiracy to rob, not guilty on the judge's</p> <p>22 direction, defendant's costs order."</p> <p>23 A. Yes.</p> <p>24 Q. Then Count 4:</p> <p>25 "A robbery against four men, David Totton,</p> <p style="text-align: center;">Page 122</p>	<p>1 A. No.</p> <p>2 Q. Right. I don't know whether there is -- yes, there is</p> <p>3 one there.</p> <p>4 A. Thank you.</p> <p>5 Q. Is the crime number shown on there?</p> <p>6 A. Yes.</p> <p>7 Q. Is that in the top right, third down, 2430?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Yes. I think that shows the date of the offence as</p> <p>10 9 October 1995?</p> <p>11 A. It does, yes, sir.</p> <p>12 Q. So what we know then, that in fact only Peter Anderson</p> <p>13 appeared before the court in respect of this.</p> <p>14 A. Yes, sir.</p> <p>15 Q. Not Anthony Grainger and not Stuart Grainger.</p> <p>16 A. Yes, sir.</p> <p>17 Q. It follows that this allegation, of 9 October 1995, was</p> <p>18 neither ordered to lie on the file against either</p> <p>19 Anthony Grainger or Stuart Grainger, that was for</p> <p>20 something different against Stuart Grainger alone.</p> <p>21 A. Yes, sir.</p> <p>22 Q. Yes.</p> <p>23 Now, you said that at the time of seeing this --</p> <p>24 A. The crime number?</p> <p>25 Q. The crime number in the subject profile, you went off</p> <p style="text-align: center;">Page 124</p>

1 and looked at GMPics?
 2 **A. I would have done, at some point, yes.**
 3 Q. What do you mean you "would have done" -- you did or it
 4 would be your normal practice?
 5 **A. No, because of the date of the crime -- I think**
 6 **I explained it yesterday, if I didn't then I will repeat**
 7 **it -- because it was an old crime --**
 8 Q. Because of the 95 at the end?
 9 **A. Yes, anything that transferred across to OPUS didn't**
 10 **contain as much information.**
 11 Q. So when you said that you "would have done", are you
 12 saying that you did?
 13 **A. No, I did, yes.**
 14 Q. You did?
 15 **A. Yes.**
 16 Q. Okay. What did you, in general terms, discover as
 17 a result of looking at GMPics?
 18 **A. That a number of people have been arrested, as I said**
 19 **yesterday, charged with a conspiracy to rob, and then,**
 20 **at the back end of the crime details, it shows what**
 21 **I believe then to be the decisions of the court.**
 22 Q. So if we go through it, please.
 23 **A. Yes.**
 24 Q. With As and Bs, at the bottom right-hand side, it should
 25 be.

Page 125

1 **A. Yes.**
 2 Q. Hopefully, there is a page A, B, et cetera, on your
 3 desk, sir?
 4 THE CHAIRMAN: I have it. Thank you very much. I have
 5 found it.
 6 MR BEER: Thank you very much.
 7 We can see the allegation on pages A and -- I think
 8 it is cut off actually. It goes on to C.
 9 **A. Yes.**
 10 Q. It looks like the core participants do not have an A.
 11 If they each write A, B, C afterwards, that will cure
 12 the problem.
 13 If it helps, it goes up to W.
 14 We can see, on page F, that witnesses were
 15 interviewed and nobody could describe the offenders;
 16 yes?
 17 **A. Yes.**
 18 Q. Then, if we go on, please, to I, there was a forensic
 19 examination of a vehicle with no result.
 20 **A. Yes.**
 21 Q. Then, I think the file is put away then, isn't it?
 22 **A. Yes.**
 23 Q. Then, if you look at L, it says:
 24 "Sir, at this stage one man is charged re this
 25 offence OM page refers ..."

Page 126

1 What date is that?
 2 **A. It would be some time around July 1996, 10 July 1996, or**
 3 **it would be after that date but it doesn't actually give**
 4 **a dated stamp on there.**
 5 Q. Is this a supervisor telling Derek?
 6 **A. Yes, to update.**
 7 Q. DC Malone, presumably, "Update your crime reports".
 8 This the kind of instruction you get, or you give,
 9 actually, as a supervisor.
 10 **A. Yes.**
 11 Q. Then DC Malone replies:
 12 "We cannot say whether he did it on the deadline
 13 that was set out or not. One man has been charged."
 14 It doesn't say who that is, does it?
 15 **A. No, it looks like it has probably gone towards the back**
 16 **end of July.**
 17 THE CHAIRMAN: I am lost with that last bit, sorry.
 18 MR BEER: Page L.
 19 THE CHAIRMAN: I have that.
 20 MR BEER: Can you see where it says, "Evaluation decision:
 21 no."
 22 Underneath it says:
 23 "Derek, please update crime re-offenders".
 24 THE CHAIRMAN: Yes, I have that, and then the text
 25 underneath.

Page 127

1 MR BEER: I think Mr Cousen is saying it looks like
 2 an instruction from the supervisor saying, "Update your
 3 crime report about what has happened", and the reply is:
 4 "Sir, at this stage, one man has been charged re
 5 this offence."
 6 We cannot date it, but the instruction was to do it
 7 by 10 July.
 8 THE CHAIRMAN: Yes.
 9 **A. Yes.**
 10 MR BEER: Can you tell who that one man was?
 11 **A. No. We could check in due course. It is -- the collar**
 12 **number there is: 02331. Where it says, "Supervisor",**
 13 **so:**
 14 **"Return no later than 10 July 1996."**
 15 **And then:**
 16 **"Supervisor: 02331."**
 17 Q. Yes, that is the person, the supervisor, saying, "Do
 18 it".
 19 **A. Yes, to do it.**
 20 Q. I am asking -- the reply, "One man charged". I am
 21 asking who was charged?
 22 **A. Sorry. Well, it is not clear on there, is it?**
 23 Q. So, reading this, you wouldn't know who was charged?
 24 **A. No.**
 25 Q. Okay.

Page 128

1 Over the page, is this another type of chasing
 2 instruction from stats saying:
 3 "The crime is shown undetected yet there is
 4 an offender with disposal shown. Please show this is
 5 shown as an error at stats and cannot be recorded until
 6 the information is compatible. Thanks, stats."
 7 So there is some inconsistency on the crime report,
 8 is there?
 9 **A. Yes.**
 10 Q. Then there is a chaser, is that right, on page N?
 11 **A. Yes.**
 12 Q. Then, on O, there is another chaser, and then there is
 13 a reply --
 14 **A. Yes.**
 15 Q. -- by officer number 04765.
 16 THE CHAIRMAN: Malone.
 17 MR BEER: Which is DC Malone, I think; is that Derek?
 18 **A. It is, yes.**
 19 Q. It says:
 20 "Further arrests have been made as a result of
 21 Op Vulture. At this stage, the defendants are charged
 22 with specific offences. However, CPS may decide to
 23 charge on overall conspiracy. Officers from Swinton CID
 24 intend to produce Stuart Grainger week commencing
 25 12 August 1996, and they may also be charged with this

Page 129

1 new date offence."
 2 **A. Yes.**
 3 Q. So that doesn't say anything new, does it?
 4 **A. No.**
 5 Q. And then, over the page at P, it says:
 6 "Anderson, Grainger, Grainger, Totton and Ellis,
 7 that famous firm, have all been additionally charged
 8 with conspiracy to rob between 9 October 1995 and
 9 10 June 1996 and remanded in custody to appear at
 10 Crown."
 11 **A. Yes.**
 12 Q. So was it that page that made you think that --
 13 **A. Yes, because the date of this crime is 9 October 1995.**
 14 **That is when the conspiracy starts.**
 15 Q. Were you in a position to see what we now know, that in
 16 fact only Mr Anderson was charged with committing this
 17 offence as a substantive offence?
 18 **A. No.**
 19 Q. And that it was not proceeded with against
 20 Mr Anthony Grainger --
 21 **A. No.**
 22 Q. -- whether as a substantive offence or as a conspiracy?
 23 **A. No, I wasn't.**
 24 Q. Why is that?
 25 **A. It is the way that the crime reports have -- get updated**

Page 130

1 **and have been updated, and there wasn't anything that**
 2 **caused me to think -- if it had been updated to say --**
 3 **later on, to say they have subsequently, you know, it**
 4 **has been now been carved up -- not carved up at court,**
 5 **but it has now been -- individual indictments, if that**
 6 **was explained on there, then obviously I would**
 7 **understand that.**
 8 Q. That is what should be explained?
 9 **A. Well, it would have made it a lot simpler to understand,**
 10 **yes.**
 11 Q. It would have made it more accurate.
 12 **A. Yes.**
 13 Q. Over the page, please, to Q. Nothing on there.
 14 Similarly on R. What does "S" mean:
 15 "Crown Court result entered. Not put."
 16 What did you take from that?
 17 **A. "Five offenders, Crown result altered. Not put."**
 18 **I think on the actual OPUS, I think it mentions on**
 19 **there it is not put for Totton. On the crime report,**
 20 **but it is on OPUS. I think you directed me to that**
 21 **yesterday, but I think it says, "Not put", on there.**
 22 Q. Let's complete looking at this before we go over.
 23 **A. Okay, fine.**
 24 Q. So you think that that --
 25 **A. For Totton.**

Page 131

1 Q. Yes, why do you interpret this, on its face, to relate
 2 only to Totton?
 3 **A. Because on the OPUS, where it says "Totton", it says**
 4 **"Not put" next to it.**
 5 Q. Is that you doing that now or did you do that at the
 6 time?
 7 **A. No, at the time. Because when I have initially looked**
 8 **at it, I have seen, obviously -- I will look on OPUS.**
 9 **There is nothing on OPUS. I know there is not going to**
 10 **be anything on OPUS. I have looked on to it on GMPics**
 11 **and the two marry up.**
 12 Q. Okay, and then over the page to T, please.
 13 **A. Yes.**
 14 Q. "Crown Court result entered, remain on file. Grainger."
 15 I don't think we know which Grainger from the face
 16 of the document, do we?
 17 **A. No. No.**
 18 Q. In any event, that is wrong, isn't it?
 19 **A. Well, now we know it is, yes.**
 20 Q. Yes. It is just incorrect.
 21 **A. Yes.**
 22 Q. And then similarly, over the page:
 23 "Crown Court result entered: not guilty: Ellis and
 24 Stuart."
 25 That is wrong too, they were not found not guilty of

Page 132

1 this offence. It was Anderson.
 2 **A. Anderson, yes, that's correct.**
 3 Q. So that is wrong too.
 4 So overall, what did you take from this? That
 5 Anthony Grainger had been charged with this offence?
 6 **A. Yes, that he had been charged with that offence and the**
 7 **comment that Rachel had put on the document about the**
 8 **lie on file was correct.**
 9 Q. Was --
 10 **A. Because the crime has been updated with the five**
 11 **offenders. It says that they have been charged with**
 12 **a conspiracy to rob, which would be encompassing that**
 13 **offence. If they were not actually encompassed on that**
 14 **offence, they would have been shown as eliminated. They**
 15 **wouldn't have been shown -- or they should have been**
 16 **shown as eliminated.**
 17 Q. You now know that is all incorrect?
 18 **A. Of course, now I know that.**
 19 Q. Can you remember when you did this? When you carried
 20 out this investigation work? Because we can see that
 21 the printout is dated 12 February this year, so Sunday
 22 of this week.
 23 **A. Yes. This would have been done in between -- some time**
 24 **after the 7th and before the 29th.**
 25 Q. Why before the 29th?

Page 133

1 **A. Because that is the point when we go to the firearms**
 2 **cadre. I am not going to go to the firearms -- I know**
 3 **because it is mentioned on the document that there is**
 4 **a likelihood that I am going to get asked a question**
 5 **about it, or potentially I will get asked a question**
 6 **about it and I don't want to be in a situation where**
 7 **I cannot answer that question.**
 8 Q. If you take out file 1, please, ie your files. I think
 9 the others can go away now.
 10 **A. Okay.**
 11 Q. File 1, tab 6.
 12 **A. Yes.**
 13 Q. Page 5.
 14 **A. Yes. Yes.**
 15 Q. The allegation in bold italics is put:
 16 "The CPS allege that Anthony Grainger's profile
 17 contained erroneous information in the proceedings in
 18 respect of an offence of robbery in the course of which
 19 a sawn-off shotgun was used were ordered to lie on file
 20 in his case. The profile was in fact incorrect because
 21 Anthony Grainger was charged together with others of
 22 conspiracy to commit robbery in 1996 and 1997 [that is
 23 of itself incorrect] and during the trial the case was
 24 dismissed against him and others, although it was
 25 ordered to lie on the file against his brother

Page 134

1 Stuart Grainger."
 2 Which is also of itself incorrect.
 3 You say:
 4 "When I received the intelligence profile from the
 5 FIB, I was not aware that it contained erroneous
 6 information. I can only assume it was human error by
 7 the person producing the document in the FIB. However,
 8 what I can say is it made absolutely no difference."
 9 **A. Yes.**
 10 Q. What you don't say, in this 24-page statement, is: when
 11 I saw it, I conducted my own private research and
 12 I discovered material that supported what
 13 Rachel Griffiths had said.
 14 **A. Sir, I was answering a questionnaire, it was in relation**
 15 **to something completely different. Had I been asked the**
 16 **question as to why, then I would have answered it.**
 17 **All the way throughout this investigation I have**
 18 **absolutely assisted to the absolute, maximum, best of my**
 19 **ability.**
 20 Q. Why didn't you say: I can sympathise with
 21 Rachel Griffiths' human error because I conducted
 22 research as well and the document that I looked at,
 23 which was not OPUS but was GMPics, also contained
 24 inaccurate information?
 25 **A. Because I was just answering the question.**

Page 135

1 Q. Because it is fair to say that in your 100-page
 2 interview and your 24-page witness statement, you are
 3 not slow at offering up information.
 4 **A. No, but I was being given questions in relation -- this**
 5 **statement is produced -- as I understand it, it was**
 6 **produced from -- was it not produced from an interview?**
 7 Q. It was. You were interviewed on 14 November by
 8 Mr Foulkes and Mr Preston.
 9 **A. Yes.**
 10 Q. Then it looks as if they produced a statement for you
 11 from the recording.
 12 **A. But the point being is, if I would have been asked**
 13 **the question: all right, well, how have you looked into**
 14 **it? What have you ...**
 15 **Then --**
 16 Q. You weren't actually asked a question at all here. The
 17 allegation was being put to you.
 18 **A. Well, I don't -- if I can just have a look at how it has**
 19 **come about, I don't know what questions were actually**
 20 **asked in relation to that.**
 21 Q. I think we can see in the interview, at 377, yes, at the
 22 top of 377 -- thank you --
 23 THE CHAIRMAN: That is divider 7, is it?
 24 MR BEER: Yes.
 25 **A. Yes.**

Page 136

1 Q. You are addressing question three. I think we looked at
 2 this yesterday.
 3 **A. Yes.**
 4 Q. If you read 377 --
 5 **A. Yes.**
 6 Q. -- and take your time, 378. 378 goes on to deal with
 7 question 4.
 8 (Pause)
 9 Wasn't this the time to say, "Look, this is how
 10 assiduous I was in following things up, I actually went
 11 and looked at this crime report on GMPics and I found
 12 the same erroneous information --"
 13 **A. Well --**
 14 Q. "-- and that is that is why I was happy to rely on what
 15 PC Griffiths was telling me."
 16 **A. Sir, I was not asked a question in relation to it.**
 17 **I was answering a specific question. There is nothing**
 18 **in the questions there that would have taken me into**
 19 **that direction, if you read through it. And I have**
 20 **explained to you, the reason why I have looked at it is**
 21 **because, actually, if I would have just looked at the**
 22 **OPUS, there's hardly any information. We can get the**
 23 **OPUS print out in comparison to the crime and you will**
 24 **see there is minimal information on there.**
 25 Q. I think we looked at it yesterday.

Page 137

1 Turning to surveillance, I think it is right that
 2 you had a particular interest in significant results of
 3 surveillance; is that right?
 4 **A. Sorry, I had a?**
 5 Q. An interest in the significant results of surveillance,
 6 ie the significant things that happened on surveillance,
 7 you had an interest in what they showed?
 8 **A. Yes.**
 9 Q. You liaised with the Force Intelligence Branch in
 10 providing them with tasking.
 11 **A. In relation to?**
 12 Q. What you wanted them to survey?
 13 **A. The DSU?**
 14 Q. The DSU, not FIB. Thank you.
 15 **A. Yes.**
 16 Q. About what you wanted them to survey?
 17 **A. Yes, well, that was actually done on a day-to-day basis**
 18 **by the OIC that would have actually -- they would have**
 19 **gone to the briefings and debriefings.**
 20 Q. I want to look, please, at some of the results of
 21 surveillance and what it showed. Can we look, please,
 22 at 1/51 to 52, please.
 23 **A. Yes.**
 24 Q. This is part of the organisational review, which I think
 25 we have looked at before.

Page 138

1 **A. Yes.**
 2 Q. Can you see, at the foot of 51, it says:
 3 "The OCG are aware of both conventional and covert
 4 policing methods, and are forensically aware. Due to
 5 the planning and sophistication of this OCG, it is
 6 unlikely they would leave forensic opportunities
 7 regarding historic offences and, indeed, at this stage
 8 there are no forensic leads to any of the subjects."
 9 **A. Yes.**
 10 Q. On 52:
 11 "The OCG have not been observed completing
 12 reconnaissance on particular premises, but their
 13 activities would suggest they are living beyond their
 14 means. For example, high value vehicles, gym
 15 membership, et cetera, without gainful employment. It
 16 is therefore reasonable to conclude that the OCG are
 17 possibly living off criminal proceeds and, in view of
 18 this and with intelligence to hand, it is therefore
 19 feasible that the OCG would attempt to commit further
 20 offences in the near future to fund their lifestyles.
 21 At this stage, timescales cannot be easily ascertained."
 22 **A. Yes.**
 23 Q. So you thought they were a sophisticated group unlikely
 24 to leave forensic opportunities and were surveillance
 25 aware?

Page 139

1 **A. This is -- at this point, this is referring to the**
 2 **Corkovics. We have not deployed surveillance at this**
 3 **point on --**
 4 Q. So this is Corkovics only?
 5 **A. Yes.**
 6 Q. Okay. We can put that file away. Can we look, please,
 7 at G2/1674. G2/1674.
 8 **A. Yes.**
 9 Q. I think this is a DSU events log.
 10 **A. Yes.**
 11 Q. Can we see, under the 6 December entry -- do you have
 12 that?
 13 **A. Yes.**
 14 Q. "Objectives discussed, IDs as per sheet. Debrief at DSU
 15 offices, movements at note. York arrives in a black
 16 Audi A6."
 17 Who is York?
 18 **A. I think that one was Aaron Corkovic.**
 19 Q. Aaron?
 20 **A. Aaron Corkovic.**
 21 Q. "Inquiries reveal he might have taken possession of the
 22 vehicle. Team replotted at this location. York driving
 23 the new Audi and then left the location and went to the
 24 following locations. He left, contravenes a red light
 25 at speed and then re-sighted at Tesco. Does a loop."

Page 140

1 And then "Team stood down."
 2 That might be said to be indicative of driving in
 3 a manner to avoid surveillance?
 4 **A. Possibly, yes.**
 5 Q. But that relates to one of the Corkovics and not to our
 6 subjects?
 7 **A. Yes.**
 8 Q. Okay.
 9 Can we look, please, at 1686, in the same bundle.
 10 **A. Yes.**
 11 Q. Can you see on this page any entries relating to our
 12 subjects?
 13 **A. On -- yes. Yes.**
 14 Q. Is that at the middle entry, 26 January?
 15 **A. Yes.**
 16 Q. Can you see any evidence there of manner of driving
 17 indicating surveillance awareness?
 18 **A. I think we thought the fact that the two vehicles had**
 19 **taken different routes, we thought that was fairly**
 20 **significant.**
 21 Q. Why was that?
 22 **A. Because they have not travelled in convoy because they**
 23 **wouldn't want the vehicles to be -- if they had pinged**
 24 **ANPR, they would not want them to be in convoy together.**
 25 Q. Anything else in that?

Page 141

1 **A. There was nothing more --**
 2 Q. Nothing that strikes you now?
 3 **A. No.**
 4 Q. I think one of your beliefs was that these subjects,
 5 Mr Totton, Grainger and Rimmer, had a practice of laying
 6 up a stolen car or cars in a safe suburban area; is that
 7 right?
 8 **A. Yes.**
 9 Q. Do you want to tell us what the basis of that belief was
 10 and why it is significant?
 11 **A. Because the cars, high performance cars, were being**
 12 **parked up in nice areas, parked up where they wouldn't**
 13 **be -- come to the notice of the public, so people**
 14 **ringing up saying, "My drive has been blocked", or that**
 15 **kind of thing, and just moved about fairly frequently.**
 16 Q. That doesn't point to or only to the commission of
 17 a robbery, does it?
 18 **A. No, not purely that. No.**
 19 Q. It can be wishing to avoid the attention of law
 20 enforcement agencies for a range of reasons?
 21 **A. Yes, it could be.**
 22 Q. Can we look, please, at the movement of cars, at
 23 G2/1684, please. In particular, please, the entry on
 24 the 24th.
 25 **A. Yes.**

Page 142

1 Q. Is there anything significant on the entry of the 24th?
 2 **A. Only of the fact that, on that particular day, we**
 3 **believe that the vehicles were potentially in the**
 4 **possession of the Corkovics, because that is where we**
 5 **had had the Corkovics fairly recently.**
 6 Q. This was a month before the decision to split, I think?
 7 **A. Yes.**
 8 Q. And G2/1688, please.
 9 **A. Yes.**
 10 Q. The top entry:
 11 "Debrief at DSU offices, movement of note. The two
 12 known outstanding stolen vehicles sighted in known lay
 13 out points, although their locations have now been
 14 swapped."
 15 Was any significance attached to that?
 16 **A. Only as I said previously, just so as to not to alert**
 17 **members of the public, moving them about just to make**
 18 **sure that they kept the vehicles fresh.**
 19 Q. Can we go to the previous G folder, please, at G2/917.
 20 I think that is -- yes, 917 is right.
 21 THE CHAIRMAN: It is volume G2, page 917.
 22 **A. Thank you.**
 23 MR BEER: I think this is part of Mr Totton's evidence, at
 24 the criminal trial.
 25 **A. Yes.**

Page 143

1 Q. Where he says that he had, on 24 January, a high
 2 visibility jacket on.
 3 **A. Yes.**
 4 Q. Had that been fed back to you?
 5 **A. Yes.**
 6 Q. What significance, if any, did you attach to that?
 7 **A. It was a common tactic used, to put hi-vis jacket on**
 8 **driving that type of car, people would think it is**
 9 **a contractor, that type of thing. It wouldn't draw**
 10 **attention to the vehicle.**
 11 Q. You said it is a common tactic to use; a common tactic
 12 by who to use?
 13 **A. By robbery teams.**
 14 Q. How many times had you encountered that before?
 15 **A. Prior to this? Certainly on two previous jobs prior to**
 16 **this and, subsequent to this, on probably another --**
 17 Q. I think on one of the Stoke visits, there was evidence
 18 that Mr Totton had left his phone behind and had not
 19 taken it down to Stoke; is that right?
 20 **A. Yes.**
 21 Q. What, if anything, by way of significance did you attach
 22 to that?
 23 **A. That the -- they were aware that we can trace phones and**
 24 **they don't want the phones tracing to wherever it is**
 25 **that they are going to be travelling to.**

Page 144

<p>1 Q. I think Mr Totton was seen on several occasions with 2 a holdall; is that right?</p> <p>3 A. Yes.</p> <p>4 Q. I think we have, on one occasion, seen that he was 5 leaving a leisure centre with it. Can we look at that, 6 please.</p> <p>7 A. Yes.</p> <p>8 Q. We can put this file away. Go to O2/850, please.</p> <p>9 A. Yes.</p> <p>10 Q. If we look at 850, in a surveillance log for 1 March, 11 can we see -- I think we looked at this earlier: 12 "Wilt [that is Mr Totton] a white male, aged 13 approximately 30 years, wearing a black T-shirt, black 14 bottoms and carrying a black holdall, exit FX Leisure." 15 That's a leisure centre, isn't it?</p> <p>16 A. Yes.</p> <p>17 Q. Any significance attached to that; that Mr Totton was 18 walking out of a leisure centre carrying a holdall?</p> <p>19 A. Other than the fact he had been to the gym. He went to 20 the gym regular with Robert Rimmer.</p> <p>21 Q. So nothing significant in terms of the investigation in 22 that?</p> <p>23 A. No. No.</p> <p>24 Q. Can I turn to 2 March then. We have seen --</p> <p>25 THE CHAIRMAN: Are we approaching a point at which --</p> <p style="text-align: center;">Page 145</p>	<p>1 A. No; not that I recall.</p> <p>2 Q. I think you knew or identified that Idgy was 3 Iain Parkinson?</p> <p>4 A. Yes.</p> <p>5 Q. Why didn't you ask for a subject profile on a man whose 6 identity you knew was planning a robbery with 7 David Totton?</p> <p>8 A. He had not featured on surveillance, and as far as 9 I understood, I don't think he had anything -- any link 10 to anything else that we had at the time.</p> <p>11 Q. So did you discount the evidence, or the intelligence 12 that you had received that Mr Totton's close friend 13 Idgy, Iain Parkinson, was involved in planning 14 a robbery?</p> <p>15 A. No, not at all.</p> <p>16 Q. But you didn't place sufficient store by it to request a 17 subject profile about him?</p> <p>18 A. We had not had any sightings, meetings, or anything 19 where it had caused me to believe that I needed one 20 there and then.</p> <p>21 Q. Similarly, the people known as Aaron and Bradley, who 22 were they assessed to be?</p> <p>23 A. The McLennan brothers.</p> <p>24 Q. Did you ask for subject profiles in relation to them?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 147</p>
<p>1 MR BEER: That is probably a good time.</p> <p>2 THE CHAIRMAN: How are you proceeding?</p> <p>3 MR BEER: I think I am going to go into tomorrow, but only 4 slightly.</p> <p>5 THE CHAIRMAN: If I say 10 minutes; is that all right?</p> <p>6 MR BEER: Thank you, sir.</p> <p>7 (3.19 pm)</p> <p>8 (A short adjournment)</p> <p>9 (3.30 pm)</p> <p>10 MR BEER: I have been asked to deal with two others things 11 before I come on to the 2 March, if I may.</p> <p>12 THE CHAIRMAN: Yes.</p> <p>13 MR BEER: You remember you said earlier that subject 14 profiles would be prepared for a range of people, 15 including anyone that came up as an associate of the key 16 actors. I don't think you used that expression.</p> <p>17 A. Not quite that terminology, but --</p> <p>18 Q. But does that get the sense of it?</p> <p>19 A. Yes.</p> <p>20 Q. You, I think, received information, that was then 21 represented in item 41 on the intelligence chronology, 22 that Mr Totton's close friend Idgy, and brothers known 23 as Aaron and David, were involved in planning a robbery.</p> <p>24 A. Yes.</p> <p>25 Q. Did you ask for a subject profile on Idgy?</p> <p style="text-align: center;">Page 146</p>	<p>1 Q. Even though it was said by this intelligence that they 2 were involved in planning a robbery with your principal 3 target?</p> <p>4 A. Well, for the same reason.</p> <p>5 Q. That they hadn't featured?</p> <p>6 A. They hadn't featured.</p> <p>7 I think during the course of the operation, there 8 was quite a number of intelligence logs that were 9 received. Obviously, we didn't get profiles on every 10 single person that had come into the investigation by 11 means of intelligence, and not even by means of coming 12 into the investigation from surveillance, but some of 13 them we did. So, for example, a lad called Adam Brown, 14 who we saw at the Corkovic meeting, we ended up getting 15 a profile on him, but then he didn't feature again.</p> <p>16 Q. The second thing was you completed an investigative 17 assessment and an operational risk assessment at the 18 start.</p> <p>19 A. Yes.</p> <p>20 Q. And that was, or they were, prepared when your principal 21 targets were the Corkovics and Mr Totton.</p> <p>22 A. Yes.</p> <p>23 Q. At the end of February, you split the investigation.</p> <p>24 A. Yes.</p> <p>25 Q. You didn't, I think, complete a fresh investigative</p> <p style="text-align: center;">Page 148</p>

1 assessment.
 2 **A. I didn't.**
 3 Q. Why was that?
 4 **A. I don't recall why I hadn't done another one. I don't**
 5 **think there was any reason in particular for not doing**
 6 **it. I don't think the risks had massively changed that**
 7 **I would need to do a new one. But you are quite right,**
 8 **I had not done a risk assessment.**
 9 Q. Because the original risk assessment was based, in part,
 10 on the intelligence relating to the use or possession of
 11 firearms by the Corkovics.
 12 **A. Yes.**
 13 Q. And that upped the risk.
 14 **A. Right at the outset.**
 15 Q. Yes.
 16 **A. I can see where you are coming from, sir, and I can't**
 17 **answer that to say I hadn't -- didn't do another risk**
 18 **assessment and I accept that.**
 19 Q. Is that another oversight?
 20 **A. Potentially.**
 21 Q. Can I turn then to 2 March?
 22 **A. Yes.**
 23 Q. Thank you.
 24 We know you briefed Superintendent Granby up because
 25 we looked at it a number of times, at 7.00 or 7.05, on

Page 149

1 2 March.
 2 **A. Yes.**
 3 Q. Did you then discuss tipping points with him?
 4 **A. Yes, during that conversation.**
 5 Q. Can we look, please, at your casebook, I think it is
 6 K/1245.
 7 **A. Yes.**
 8 Q. Are you at 1245?
 9 **A. Yes, sir.**
 10 Q. Is the entry, at 19.05, your record of your discussion
 11 with Mr Granby?
 12 **A. Yes.**
 13 Q. I don't think that refers to any discussion over tipping
 14 points, does it?
 15 **A. No. No.**
 16 Q. Did you make any record of a discussion with Mr Granby
 17 over tipping points?
 18 **A. I didn't make any record -- it would have been in my**
 19 **book there, so ...**
 20 Q. So you didn't? If there was to be a record, it would be
 21 here?
 22 **A. Yes.**
 23 Q. Okay.
 24 By this time, had you discussed the issue of
 25 evidential sufficiency with Nicola Moore of the CPS.

Page 150

1 **A. That had been done, I think -- I would have to look at**
 2 **the when the last occasion was when she had actually**
 3 **been liaised with. It was either during the day of the**
 4 **Friday or on the Thursday. If I could just --**
 5 Q. Okay, in terms of your discussions, can we look in the
 6 same book, please, at page 1195.
 7 **A. Yes.**
 8 Q. Which I think is an entry for 26 January. Can we see
 9 that?
 10 **A. Yes.**
 11 Q. At the foot of the page:
 12 "Speak to CPS, Nicky Moore, who has in turn spoken
 13 to Mark Callaghan about this case. She has reviewed the
 14 information that I have provided to her verbally and
 15 advised that the case is on the cusp of passing the
 16 threshold test. Much would depend on what items are in
 17 the car, weapons/face coverings/means of communication,
 18 et cetera."
 19 Then I think that entry ends. Was that your last
 20 discussion with Ms Moore?
 21 **A. I can't remember. I spoke to her -- I would have to**
 22 **flick through my book.**
 23 Q. We know DC Talbot did. I couldn't see any other
 24 subsequent entry.
 25 **A. Yes, in which case --**

Page 151

1 Q. I may be wrong because I am reading somebody else's
 2 handwriting in a long document.
 3 **A. Yes.**
 4 Q. Can we look, please, at file E, at 267.
 5 **A. Yes.**
 6 Q. Which is Ms Moore's witness statement.
 7 **A. Yes.**
 8 Q. She says that during the operation:
 9 "I had numerous meetings and telephone discussions
 10 with the SIO, DI Cousen, and the case officer,
 11 DC Talbot. Initially, the conversation related to the
 12 evidence in general and I recall, particularly, one
 13 conversation when they called me and said that there was
 14 insufficient evidence to pass the threshold test, but
 15 they were under an a lot of pressure from their
 16 superiors because the investigation was resource heavy.
 17 I told them that if they wanted to have a formal
 18 discussion, they could, but if they felt they had
 19 insufficient evidence, it was their decision."
 20 Did you have such a conversation with Nicola Moore?
 21 **A. No, I think she is mistaken in this regard. I think**
 22 **what she is talking about is I talked about tipping the**
 23 **balance for a charging decision. I had already**
 24 **documented that we was on the cusp and it was about when**
 25 **we tipped the balance. You know, we are on the cusp of**

Page 152

1 **passing that threshold.**
 2 Q. Can we break it down? Did you have a conversation with
 3 her in which you said, "We know that there is
 4 insufficient evidence to pass the threshold test, but we
 5 are under a lot of pressure from our superiors because
 6 the investigation is resource heavy"?
 7 **A. No, not had that conversation.**
 8 Q. So that is just incorrect, what Ms Moore says?
 9 **A. Well, if you want to give me what my recollection of**
 10 **what --**
 11 Q. Let's just see. You never had a conversation with her
 12 that you were under a lot of pressure because the
 13 investigation was resource heavy?
 14 **A. No. I can break it down for you, but --**
 15 Q. Go on then, please do.
 16 **A. I discussed with her the fact that when I spoke to**
 17 **her -- which was on 26 January -- that, potentially, we**
 18 **would be deploying resources the following week;**
 19 **firearms resources; surveillance assets. So the point**
 20 **of the conversation with Nicky was to say, "I need**
 21 **a decision because I am going to have to go back, I am**
 22 **going to have to update -- or I need to know that we**
 23 **have not passed the threshold for a charging decision,**
 24 **because if we are deploying these assets, I can't be**
 25 **doing it if we are at that position". So that was**

Page 153

1 **a conversation that I had had with Nicky.**
 2 **In relation to the pressure from --**
 3 Q. Just, she has the wrong end of the stick, you think?
 4 **A. Yes.**
 5 **In relation to pressure, I was not under any**
 6 **pressure from anybody. I got the resources on tap**
 7 **available to me.**
 8 **If you bear in mind, this kind of strand of the**
 9 **investigation, we had only been going on for 12 days.**
 10 **David Totton had only come back in the country on the**
 11 **13 January, we didn't actually put him with the stolen**
 12 **vehicle till the 25th, so it was very much in its**
 13 **infancy. I was not under any pressure, and I think**
 14 **where Nicky may have been mistaken in that regard is in**
 15 **relation to the fact that, obviously, I am going to be**
 16 **speaking to senior officers.**
 17 **I think, actually, there is an email where**
 18 **I actually allude to the fact that I have spoken to the**
 19 **CPS and I confirm to Mr Ellison, or Mr Ellison confirms**
 20 **the fact that the CPS have been liaised with.**
 21 Q. Yes, I certainly accept there is an email that says you
 22 liaised with the CPS. It is the content of the email
 23 I am more concerned with.
 24 **A. First things first, I wouldn't speak to the CPS about**
 25 **tipping points. That's a purely operational --**

Page 154

1 Q. We are going to come to that in a second.
 2 **A. Okay, sorry.**
 3 Q. At the moment, I am just focusing on that you know there
 4 is insufficient evidence to pass the threshold, but you
 5 are under a lot of pressure. That is just wrong?
 6 **A. It is wrong. And the resource heavy from the Robbery**
 7 **Unit perspective, there was me, the DS and three or four**
 8 **DCs, that is not a high resource. Yes, using the**
 9 **surveillance unit but, as I said, we had only been on**
 10 **them for a short period of time.**
 11 Q. She continues:
 12 "There was discussion around that time about tipping
 13 points, and I advised them that that was an operational
 14 decision and was not something I would have any
 15 involvement in. I remember discussing the tipping
 16 points with my line manager, in particular Kevin Rogers,
 17 as at the time it appeared that we were being asked
 18 about tipping points in other cases."
 19 Did you discuss tipping points?
 20 **A. No, as I have said, I think it is the -- when are we**
 21 **tipping the balance? When are we at this position where**
 22 **we can say that reconnaissance has gone further so we**
 23 **can get a charging decision?**
 24 Q. So you did have a discussion with her about tipping the
 25 balance on the evidence?

Page 155

1 **A. Yes.**
 2 Q. But not tipping points in terms of making an arrest?
 3 **A. No. I know you just read it out but I think I have**
 4 **worded it, "We are on the cusp", which by definition we**
 5 **were nearly there but --**
 6 Q. Did she advise you that you were nearly there to charge?
 7 **A. We were on the cusp of -- dependent on those other**
 8 **areas.**
 9 Q. Can we look, please, at -- so we can put away what
 10 Ms Moore said --
 11 **A. Sorry, there was mention there about -- on other**
 12 **operations, was there, about --**
 13 THE CHAIRMAN: Other cases, at the top of page 268.
 14 MR BEER: Yes.
 15 **A. Is Ms Moore able to provide us with some --**
 16 Q. We will ask her when she comes.
 17 **A. Thank you, sir.**
 18 Q. P/56, please.
 19 This is part of DC Talbot's casebook for 1 March.
 20 **A. Yes.**
 21 Q. Where he says:
 22 "Speak to Nicky Moore, CPS lawyer, and discuss
 23 recent events regarding the Audi travelling to the
 24 St Helens area on 21 February and the events of last
 25 night, where the Audi travels to Culcheth with Totton

Page 156

1 and Grainger, and then return when Totton places the
 2 hacksaw into the boot of his Audi. Due to the fact that
 3 the areas visited, St Helens, Stoke and Culcheth have
 4 been visited at times when premises are closed and
 5 nothing more than any preparatory activity have taken
 6 place, then there will be insufficient evidence to
 7 charge if there are any substantial offences. Subjects
 8 need to have weapons, relevant clothing, (gloves,
 9 balaclavas)."
 10 Did DC Talbot tell you that?
 11 **A. He would have updated me, maybe not in those terms or**
 12 **exactly as he has worded it there, but he definitely**
 13 **would have updated me to say that he had spoken to the**
 14 **CPS.**
 15 Q. And that their advice was there was insufficient
 16 evidence to charge?
 17 **A. Yes, if I could have a look in my book, I may have made**
 18 **some --**
 19 Q. Yes, sure, K/1236. I think you have an entry halfway
 20 down the page.
 21 **A. Thank you.**
 22 Q. The tasking, and then if you go to 1237:
 23 "CPS advice from Nicky Moore, not sufficient for
 24 charge, acts are no more than merely preparatory."
 25 **A. Yes.**

Page 157

1 Q. So you were told there was not sufficient for charge.
 2 **A. Yes.**
 3 Q. Were you told what DC Talbot has recorded, that,
 4 "Subjects need to have weapons or relevant clothing (ie
 5 gloves and balaclavas)"?
 6 **A. I don't remember specifically, but he may have done.**
 7 Q. Can we look, please, at the tipping points that were
 8 subsequently agreed. Can we start, please, in your
 9 folder, at tab 1, page 8. This is part of your first
 10 witness statement.
 11 **A. Yes.**
 12 Q. Do you see, at the top of the page, you say:
 13 "On Saturday, 3 March, I attended a firearms
 14 briefing ..."
 15 **A. Yes.**
 16 Q. "... I discussed my evidential requirements prior to any
 17 arrests being made with the strategic firearms commander
 18 and this involved --
 19 **A. It was actually the tactical firearms commander.**
 20 Q. Yes, the TFC, you made a mistake there by calling him
 21 the silver firearms commander but he was actually the
 22 TFC.
 23 **A. Yes.**
 24 Q. "This involved two or more persons, including the
 25 subjects, being together in the stolen Audi and

Page 158

1 potentially another vehicle. Essentially, I didn't
 2 believe an offence would occur with only two of the
 3 subjects being together but I was conscious that another
 4 vehicle may be present with other person to assist
 5 during the act of robbery."
 6 There you are describing your evidential
 7 requirements and this is two or more people, including
 8 the subjects, being together in the Audi?
 9 **A. Yes.**
 10 Q. That seems rather to ignore what DC Talbot had been
 11 told, that two people present in a vehicle was not
 12 enough, you needed sight of weapons or possession of, or
 13 being clothed in relevant clothing, doesn't it?
 14 **A. And it is very difficult to explain without explaining**
 15 **it in closed court, sir, because there was rationale**
 16 **behind that, a reason behind that.**
 17 Q. What, that your evidential requirements were simply two
 18 people in a car?
 19 **A. No. It is very difficult to explain it, sir, in the**
 20 **circumstances.**
 21 Q. Okay.
 22 **A. Because I know that I will be able to discuss it with**
 23 **you in closed court.**
 24 Q. We will note and pursue that in closed, but do you agree
 25 that your record of the evidential requirements being

Page 159

1 existent before an arrest being made, on the face of
 2 this document, is two or more people, including the
 3 subjects, being in the stolen car without more; that is
 4 what it says, isn't it?
 5 **A. Yes, but there was a reason behind that.**
 6 Q. Okay, can we see then what happened as a result of your
 7 discussion with Chief Inspector Lawler. Can we look at
 8 tab 16, please, at page 455. 455. Tab 16, 455. So it
 9 is part of Mr Lawler's PowerPoint presentation.
 10 **A. Yes.**
 11 Q. Can you see that his briefing, which he subsequently --
 12 or which was subsequently read --
 13 **A. Yes.**
 14 Q. -- sets out four tipping points?
 15 **A. Yes.**
 16 Q. How were these arrived at with Mr Lawler?
 17 **A. A discussion during the course of the -- at the**
 18 **briefing.**
 19 Q. Which briefing?
 20 **A. On 1 March.**
 21 Q. The 12.30 one?
 22 **A. Yes.**
 23 Q. The lunchtime one?
 24 **A. Yes.**
 25 Q. Okay, and were these agreed with him then?

Page 160

1 **A. With Mr Lawler?**
 2 Q. Yes.
 3 **A. Well, after the firearms authority had been granted,**
 4 **yes.**
 5 Q. Were they agreed prospectively then, that in the event
 6 that a firearms authority was granted, these will be the
 7 tipping points?
 8 **A. In fact, he has probably gone to the SFC with, "This is**
 9 **what I would recommend".**
 10 Q. Yes.
 11 **A. Yes.**
 12 Q. Because the SFC has to sign off, amongst other things,
 13 the strategy which includes a reference to tipping
 14 points.
 15 **A. Yes. Yes.**
 16 Q. So I think these would have been settled by you and
 17 Mr Lawler before the approach to Mr Heywood?
 18 **A. Yes.**
 19 Q. Okay.
 20 Can we see in the last sentence, it says:
 21 "The tipping points can be applied individually or
 22 together."
 23 **A. Yes.**
 24 Q. Does that mean if one of them is satisfied, then the
 25 tipping point is met?

Page 161

1 **A. It does, but there is always flexibility around that.**
 2 Q. Okay. This says:
 3 "One or more of the subjects are in the stolen
 4 Audi ..."
 5 **A. Yes.**
 6 Q. And:
 7 "... and moving towards Culcheth."
 8 Is that right; that if one person was in the car and
 9 moving towards Culcheth, a tipping point would be met?
 10 **A. That was what was agreed, and the honest answer is:**
 11 **I don't know why we ended up agreeing on the one.**
 12 **If I am being completely honest with you.**
 13 Q. It is a bit odd, isn't it?
 14 **A. It is -- yes, when I have looked back on it now, it is**
 15 **unusual. And I can't explain --**
 16 Q. Looking back on it now, that is wrong, isn't it? That
 17 would not be a tipping point; a single person in a car?
 18 **A. Yes, I think it had something to do with fact that --**
 19 **bearing in mind that deployment was on the basis of the**
 20 **sighting of the hacksaw and we didn't want to get into**
 21 **a situation where it was a bank that was going to be the**
 22 **target of an attack and a kind of lie in wait robbery,**
 23 **and I am sure it was something to do -- at some point,**
 24 **it was mentioned that we didn't want to get into**
 25 **a hostage type situation. So whether or not that is the**

Page 162

1 **reason why we ended up going for the one, I can't**
 2 **honestly remember. But, on looking at it, I agree, it**
 3 **does look unusual.**
 4 Q. So, do you think it has been wrongly written up?
 5 **A. No, I don't think it -- I don't think it has been**
 6 **wrongly written up. I think --**
 7 Q. You are struggling to think of a reason for it?
 8 **A. I just cannot think of the reason, but perhaps Mr Lawler**
 9 **can help in that regard.**
 10 Q. I am trying to get your assistance at the moment because
 11 you agreed it.
 12 **A. I know you are. Yes, absolutely, I did. I am sorry**
 13 **that I cannot help you further.**
 14 Q. The second and third:
 15 "Further information or intelligence to corroborate
 16 previous intelligence that the subjects are committing
 17 acts more than preparation for a commission of a robbery
 18 or an assessment by the SIO and the TFC that the
 19 subjects are engaged in a significant criminal
 20 enterprise and their behaviour is indicative of this."
 21 The first of those, numbered (2) --
 22 **A. Yes.**
 23 Q. -- where you refer to "the subject", was that all three
 24 of them or any of them?
 25 **A. Well, given that it is referring to one or more of the**

Page 163

1 **subjects -- it is not clear, is it, sir?**
 2 Q. No.
 3 Number 3:
 4 "The assessment from the SIO and the TFC."
 5 Did that mean that you both had to agree; ie two
 6 people had to agree before the tipping point was met?
 7 **A. No, I think it is in terms of a professional discussion,**
 8 **balancing what I might consider to be my evidential**
 9 **requirements against, obviously, the public safety.**
 10 Q. But the way it is worded means that you both have to
 11 have made an assessment, that the subjects are engaged
 12 in a significant criminal enterprise.
 13 **A. Well, the way that it worked, practically speaking, is**
 14 **that I would be asking the TFC -- or saying to the TFC,**
 15 **"I think it is met" or "Can we let this run for a bit**
 16 **longer?" But it is a professional discussion.**
 17 Q. But did you both have to agree?
 18 **A. I don't know if we would have to agree because,**
 19 **ultimately, if it got to a position where Mr Lawler**
 20 **deemed that we had to take some action, then regardless**
 21 **of what my opinion was, then that is what would have --**
 22 Q. So he has the final call?
 23 **A. Yes.**
 24 Q. Okay.
 25 Number 4:

Page 164

1 "The proximity of the subjects to Culcheth Parade."
 2 **A. Yes.**
 3 Q. That was enough, just that they were close to
 4 Culcheth Parade?
 5 **A. Yes.**
 6 Q. Even if they had done nothing else?
 7 **A. The fact that -- yes.**
 8 Q. Just that they are close?
 9 **A. That is --**
 10 Q. They had been close before, had they not, quite a few
 11 times?
 12 **A. Yes.**
 13 Q. Why going close again, would that be sufficient?
 14 **A. Because we had had the sighting of the hacksaw, moving**
 15 **between the vehicles, the fact that the vehicles --**
 16 Q. I don't think you had had a sighting of it moving
 17 between the vehicles?
 18 **A. Well, we discussed it --**
 19 Q. We had a sighting of it going into a vehicle, and you
 20 drew the inference that it had come from another vehicle
 21 which had been to Culcheth.
 22 **A. Okay.**
 23 **But such a position that I would have been satisfied**
 24 **that subjects could be arrested.**
 25 Q. But they had done this four times previously by now,

Page 165

1 I think, been in proximity to Culcheth Parade
 2 Warrington, hadn't they?
 3 **A. No, not at that point. Not evidentially. There had**
 4 **only been one occasion on the 29th.**
 5 Q. Right. There had been some VTD evidence?
 6 **A. No, it is not evidence. We couldn't use it in evidence.**
 7 Q. You had them on surveillance, once before then, on the
 8 29th?
 9 **A. Yes.**
 10 Q. It was just because of the hacksaw that if they went
 11 back again, that would be enough to arrest and charge?
 12 **A. Well, not just in relation to that, obviously. We would**
 13 **be looking back then to the previous incident in**
 14 **St Helens and to the previous incident -- it would be**
 15 **a culmination.**
 16 Q. What tipped the balance then; them returning to Culcheth
 17 once more?
 18 **A. Because we didn't want to get into a situation where if**
 19 **it was going to be a lie in wait bank robbery that we**
 20 **let it run to a point where they were actually in the**
 21 **bank and we get into a kind of hostage type situation.**
 22 Q. We can see that none of these really reflect what
 23 DC Talbot was told by Nicky Moore.
 24 **A. That is the point, in terms of tipping points. CPS do**
 25 **not come into tipping points, it is down to public**

Page 166

1 **safety. And then, ultimately, if you arrest and the CPS**
 2 **deem that you haven't got sufficient evidence, well, so**
 3 **be it. It is not the CPS that are managing the threat.**
 4 Q. So you were agreeing tipping points knowing that they
 5 may fall short?
 6 **A. Potentially.**
 7 Q. Or well short of a charge?
 8 **A. Potentially.**
 9 Q. Can we turn then -- keep that open, please, and turn up
 10 file F/1273. F/1273.
 11 **A. I've got bundle F, but we have not got the next one.**
 12 THE CHAIRMAN: It is not already out, is it?
 13 MR BEER: 1273.
 14 THE CHAIRMAN: Yes, thank you, Mrs Shaw.
 15 **A. Yes.**
 16 MR BEER: These are the tipping points that Mr Granby --
 17 **A. Yes.**
 18 Q. -- I think agreed.
 19 **A. Yes.**
 20 Q. Did he agree them with you?
 21 **A. Yes, I actually looked at these on the morning.**
 22 Q. On what did you look at them?
 23 **A. I think he got me to come and have a look at them -- he**
 24 **had them up on the screen.**
 25 Q. As part of his PowerPoint?

Page 167

1 **A. Yes.**
 2 Q. So you did, at that point, have access to his PowerPoint
 3 before the briefing?
 4 **A. Yes, he specifically wanted me to look at this because**
 5 **of the discussion that we had.**
 6 Q. Had they been agreed with you before he went off to get
 7 authority from the strategic firearms commander?
 8 **A. No. I wouldn't have said agreed in that detail. That**
 9 **is the reason why I have looked at them in the morning.**
 10 Q. A moment ago, we said it was part of the strategic
 11 firearms commander's job to look at a strategy that may
 12 include tipping points.
 13 **A. Yes.**
 14 Q. Does it follow that the time that Mr Sweeney approved
 15 the tactics of the operation, the tipping points hadn't
 16 been settled with you, he agreed it at 8.50 the previous
 17 night?
 18 **A. They wouldn't need to be, to be fair. They are**
 19 **documented on the TFC log. It is not something that**
 20 **I document, but it may have followed that. I don't know**
 21 **what time they are recorded.**
 22 Q. Had you discussed the tipping points the previous day,
 23 with Mr Granby?
 24 **A. There had been a discussion.**
 25 Q. When?

Page 168

1 **A. During the course of the conversation that I had had**
 2 **with him.**
 3 Q. The 7.05 conversation?
 4 **A. Yes.**
 5 Q. What tipping points did you agree?
 6 **A. Well, we discussed in terms of where we are with this**
 7 **but then there was issues in relation to how we actually**
 8 **documented that, based on some of the intelligence that**
 9 **he was also aware of.**
 10 Q. If we look at the two documents alongside each other, we
 11 can see that Mr Granby's record of the tipping points is
 12 that two or more of the subjects are in the stolen
 13 Audi --
 14 **A. Yes.**
 15 Q. -- but not that they are moving towards Culcheth?
 16 **A. Yes.**
 17 Q. Why the change?
 18 **A. Again, it is something I can probably go into more**
 19 **detail in closed court with you, sir.**
 20 Q. That is due only and exclusively to intelligence that
 21 can be discussed about in closed?
 22 **A. Yes.**
 23 Q. The change?
 24 **A. Yes.**
 25 Q. Okay.

Page 169

1 Second, I think is the same; yes?
 2 **A. Yes.**
 3 Q. The third is the same?
 4 **A. Yes.**
 5 Q. But the fourth has disappeared?
 6 **A. Again, for the same reason.**
 7 Q. The fourth has disappeared because, and only because,
 8 exclusively because, of closed evidence?
 9 **A. Yes.**
 10 Q. It was removed deliberately; is that right?
 11 **A. Yes, a conscious --**
 12 Q. A conscious decision to remove the fourth tipping
 13 point --
 14 **A. Yes.**
 15 Q. -- because of some closed evidence that we are to
 16 discuss?
 17 **A. Yes.**
 18 Q. And that was agreed between you and Mr Granby?
 19 **A. Yes.**
 20 Q. Thank you.
 21 Can we turn then, please -- I think we can put away
 22 the F file and turn to some tactical considerations.
 23 Can we look in your file 1, at tab 19.
 24 **A. Yes. Okay.**
 25 Q. Tab 19?

Page 170

1 **A. Yes.**
 2 Q. Which is the recording of the 2 March briefing given by
 3 Mr Lawler and X7.
 4 **A. Yes.**
 5 Q. I think you were present; yes?
 6 **A. Yes.**
 7 Q. Can we look at page 1179.
 8 **A. Yes.**
 9 Q. In the second main paragraph, he says:
 10 "Okay, I am going to go into the roles and
 11 responsibilities and the nuts and bolts of the MASTS
 12 deployment shortly. I want just to give you an
 13 overview, first. Okay, when we have completed all our
 14 tasks we are going to make our way to Leigh police
 15 station. Obviously, you can see they're situated off
 16 Chapel Street, subject vehicle is currently parked in
 17 Boothtown, which is in this area here and, obviously,
 18 you can see the area where we believe any operation may
 19 be taking place is Culcheth. The reason we are at Leigh
 20 Police Station is obviously to intercept the subjects
 21 prior to them getting to Culcheth."
 22 **A. Yes.**
 23 Q. Yes?
 24 **A. Yes.**
 25 Q. Was that right; was that the tactic on 2 March --

Page 171

1 **A. Well, that's --**
 2 Q. -- to intercept them prior to them getting to Culcheth?
 3 **A. That is their tactic. "Intercept them" doesn't -- that**
 4 **doesn't mean to stop them. "Intercept them" means to**
 5 **get on to the back of the surveillance, is my**
 6 **understanding. They are not travelling on the**
 7 **surveillance convoy, they are parked up at Leigh. So**
 8 **what they are saying is they are going to intercept the**
 9 **surveillance before it gets to Culcheth.**
 10 Q. Is that what you understood that to mean?
 11 **A. Yes.**
 12 Q. Can we look, please, at page 1180 -- I think this is
 13 still X7 talking.
 14 **A. I would just say, in relation to that last one, that is**
 15 **my interpretation from reading it. I don't recall, at**
 16 **the time, that being said but that is what my**
 17 **interpretation of reading it there is.**
 18 Q. 1180, second paragraph:
 19 "While we are on the subject, our intention is to
 20 conduct an interception prior to any offence taking
 21 place, which is before we get to Culcheth."
 22 **A. Right.**
 23 Q. That tends to suggest they intended to stop them before
 24 they got to Culcheth, doesn't it?
 25 **A. It does there, yes, but that not what the tipping**

Page 172

1 point --
 2 Q. Why were the firearms officers being briefed that they
 3 were being stationed at Leigh Police Station which was
 4 in between Boothtown and Culcheth to intercept the
 5 subjects before they got to Culcheth?
 6 **A. I don't know.**
 7 Q. According to your tipping points, that was not the plan
 8 at all, was it?
 9 **A. No, but it is the tactics of the team, so that would**
 10 **have to be discussed with the firearms officers.**
 11 Q. Did you think, when you heard this said, "Hold on, that
 12 nothing like what I have agreed. They are going off on
 13 a different tactic here, which is a stop before they
 14 even get to Culcheth"?
 15 **A. No, well -- I don't know what I thought. I certainly**
 16 **don't remember it but, I have certainly not spoken out,**
 17 **have I, because there is nothing here that would suggest**
 18 **that I have said something about it?**
 19 Q. No.
 20 Can we turn to contingencies, at page 1181, please.
 21 He says -- X7 I think this is:
 22 "Hmm contingencies, they were aware of our tactics
 23 and surveillance tactics, and as I've mentioned -- so we
 24 have to take into account the area we are going into.
 25 Culcheth is really, really quiet. They will see four

Page 173

1 vehicles coming up behind, so we will have to be really
 2 coy about it if we do go to amber whether we can get
 3 behind them without them making off. It is quite
 4 residential and there are going to be very few public
 5 vehicles on the road there, so we are going to have to
 6 take that into account. It may be appropriate that they
 7 are getting on to the plot, so if that is the case and
 8 we cannot get close to them, we will let them deploy.
 9 As it stands, there no threat to any individuals as we
 10 are aware, so it may well be the safest option is to let
 11 them deploy on foot and we conduct any strike there."
 12 Was that discussed with you?
 13 **A. Not in that -- not in that detail, but I would say that**
 14 **this is to do with the firearms tactics.**
 15 Q. Why would you understand it, as an experienced officer,
 16 albeit not a firearms officer, the safest option, if
 17 they get into the car park, to let them get out of the
 18 car first?
 19 **A. Well, I don't -- I can't answer it, can I, because I am**
 20 **not trained, so I don't know. I don't know if that is**
 21 **what is taught on the training courses that the firearms**
 22 **officers go on.**
 23 Q. Did you think when you heard this: why is it safe, when
 24 they get on to the car park, to let the subjects get out
 25 of the car first and conduct a strike?

Page 174

1 **A. I have not thought anything, have I?**
 2 Q. Do you know why this tactic was not utilised on 3 March
 3 and instead a strike was put in when the officers had to
 4 approach a car with blacked out side windows in the
 5 dark, where on three sides it was blocked in because it
 6 was in the corner and when the officers could not see
 7 from the sides what the subjects were doing with their
 8 hands or what was in the car?
 9 **A. I know because, obviously, the tipping points were met**
 10 **and the team went to State Amber and then went to State**
 11 **Red.**
 12 Q. Was there any discussion with you, on the 3rd, about the
 13 safest option being to let them get out of the car, so
 14 presumably you could see what they were doing with their
 15 hands, whether they had anything in possession?
 16 **A. Sir, I would never have those discussions. That is**
 17 **a very tactical discussion and it is around the TAC**
 18 **adviser, the TFC, I would imagine, is included in that,**
 19 **and perhaps the team. I don't know. It is very much**
 20 **a tactical conversation, that.**
 21 Q. I think you were concerned throughout the operation to
 22 discover whether cash in transit companies would conduct
 23 drop-offs at times when the subjects may be in the
 24 proximity of premises to which the drops would be made?
 25 **A. It was one of my concerns, yes.**

Page 175

1 Q. It was important, therefore, to establish if drop-offs
 2 were to be made and, if so, when?
 3 **A. Yes.**
 4 Q. I think we can look at some examples of that. We can
 5 put bundle 1 away -- thank you -- and look at G1/1709.
 6 I think this is a part of the CLIO action management
 7 system; is that right?
 8 **A. That's correct.**
 9 Q. Is this a report back from DC Clark to the Deputy SIO,
 10 DS Hurst, on 1 November 2011?
 11 **A. Yes, it is.**
 12 Q. It says, as the subject, "Action 26":
 13 "Liaise Project Baltic re cash deliveries in
 14 Prestwich."
 15 What was Project Baltic?
 16 **A. It was a project which dealt purely with banks, building**
 17 **societies, financial industry and CVIT.**
 18 Q. Did it have ready access to the drop off and pick up
 19 times of CVIT?
 20 **A. They would have a direct link to be able to get that**
 21 **information.**
 22 Q. Sorry?
 23 **A. They would have a direct link.**
 24 Q. So rather than necessarily going off to the institutions
 25 yourself, you would go to Baltic, which would have

Page 176

1 a collection of the relevant drop off and pick up times?
 2 **A. Well, no, they would have to go to the relevant**
 3 **companies but, because they were coming from Baltic,**
 4 **then they would know that it is not just Joe Bloggs**
 5 **going and asking can you give me --**
 6 Q. So they would have ready access along established means
 7 of communication?
 8 **A. Yes.**
 9 Q. And DC Clark reports:
 10 "I report as follows: I have liaised with cash in,
 11 civ ..."
 12 Is that civilian?
 13 **A. Yes.**
 14 Q. "... Kay, who is the spot for cash delivery to banks in
 15 relation to Operation [blank]. She sent the deliver
 16 days for the drops in the Prestwich area for the week
 17 commencing the 24th. They were as follows."
 18 They are set out for the 25th, the 27th and the 31st
 19 and then 3 November?
 20 **A. Yes.**
 21 Q. So this was the way in which you would establish drop
 22 off times for cash in transit?
 23 **A. Yes.**
 24 Q. If we just look at a couple of other examples, if we get
 25 out -- and we can put that one away -- k/1192. I think

Page 177

1 this is part of your book, is it?
 2 **A. Yes.**
 3 Q. It is an entry for 13 December, I think?
 4 **A. 25 January.**
 5 Q. 25 January, thank you.
 6 It is an update for Anne-Marie Kay, who is she?
 7 **A. That is the same civilian.**
 8 Q. The civilian, Kay?
 9 **A. Yes.**
 10 Q. "The cash centre opens, deliveries commence from [and
 11 then there is a time] hours. The duty manager is [and
 12 there is a name]. He is on duty at [and then there is
 13 a time]. His mobile number is [blank]. Then there is
 14 [blank] number of drops tomorrow."
 15 **A. Yes.**
 16 Q. "We can request the trip sheet."
 17 Then you speak to the manager, and there is his
 18 mobile number set out.
 19 "[Blank] is the overall branch manager and is on at
 20 [blank] hours."
 21 The mobile and land numbers set out.
 22 **A. Yes.**
 23 Q. If we look also at 1237, middle of the page:
 24 "There is a delivery at the Post Office at 4.00 pm
 25 tomorrow. Awaiting further from Anne ..."

Page 178

1 **A. It is just poor writing on my behalf but "Anne-Marie**
 2 **Kay".**
 3 Q. Anne-Marie Kay, all right.
 4 So there was a settled and established system for
 5 obtaining information about cash in transit deliveries?
 6 **A. Yes.**
 7 Q. Can we put that away, please, and open up your file at
 8 tab 6.
 9 Right at the end, you say at the end of the second
 10 paragraph, when dealing with the briefing prepared, and
 11 saying that the 3 March briefing was prepared by the
 12 TFU, and at three lines from the end you say:
 13 "However, on 3 March the operation was responding to
 14 new specific intelligence and a change can be seen on
 15 the firearms briefing threat assessment and working
 16 strategy where cash in transit custodians have been
 17 added but hadn't featured previously."
 18 **A. Sorry, sir, I have completely lost that.**
 19 THE CHAIRMAN: Page 93.
 20 MR BEER: Page 93.
 21 THE CHAIRMAN: Right at the end of that statement.
 22 MR BEER: The first dash.
 23 **A. Okay.**
 24 Q. Three lines from the end:
 25 "However, on 3 March the operation was responding to

Page 179

1 new specific intelligence and a change can be seen on
 2 the firearms briefing threat assessment and working
 3 strategy where cash in transit custodians have been
 4 added but hadn't featured previously."
 5 **A. Yes.**
 6 Q. Yes?
 7 **A. Yes.**
 8 Q. So does it follow that, by 3 March, the intelligence
 9 indicated that any robbery was likely to involve a cash
 10 in transit delivery?
 11 **A. That was a possibility.**
 12 Q. Well, it was the working assumption, wasn't it?
 13 **A. No, it wasn't, sir.**
 14 Q. Why not?
 15 **A. If you look at the briefing for that day, you will see**
 16 **that it actually says -- it does include cash and**
 17 **valuables in transit, but it also includes all the other**
 18 **premises in Culcheth. I was never in a position where**
 19 **I knew whether it would be subjects, premises, vehicle**
 20 **or otherwise.**
 21 Q. But as a result of the new specific intelligence that
 22 you described --
 23 **A. Yes.**
 24 Q. -- you were sufficiently clear that there needed to be
 25 a change to the threat assessment and a change to the

Page 180

1 working strategy to add cash in transit custodians in,
 2 weren't you?
 3 **A. Yes, you certainly had to consider it, in addition to**
 4 **all the other ones.**
 5 Q. Can we look, please at what you are referring to there.
 6 **A. Yes.**
 7 Q. Firstly, look at tab 16, page 453, and take out --
 8 I realise it has been a long day, officer, and if you
 9 are flagging at all, then say so.
 10 **A. No, that is okay.**
 11 Q. I want to try a get the best evidence out of you on some
 12 important issues.
 13 **A. I know that.**
 14 Q. We are going to have two files open at the same time.
 15 This, at 453, which is Chief Inspector Lawler's threat
 16 assessment, and then Superintendent Granby's at F/1271.
 17 Are we all there?
 18 **A. Yes.**
 19 Q. I've got Mr Granby's in my left hand and Mr Lawler's in
 20 my right. You are referring to adding into the threat
 21 assessment and working strategy cash in transit
 22 custodians, but I just want to compare the two threat
 23 assessments.
 24 On the right-hand side, Mr Lawler's, he has got the
 25 threat of the general public at the point of police

Page 181

1 interception as low, but the following day it has gone
 2 up to medium, can you see that?
 3 **A. Yes.**
 4 Q. The threat to the general public in Culcheth stays at
 5 medium. The general public, "if the subjects are not
 6 arrested and the police fail to arrest" them remains
 7 high.
 8 **A. Yes.**
 9 Q. To untasked police officers it remains low. For tasked
 10 police officers it has gone from medium to high and for
 11 subjects, at the point of interception, it remains
 12 medium.
 13 **A. Yes.**
 14 Q. Overall the threat remains high. The addition is, in
 15 Mr Granby's threat assessment, cash in transit
 16 custodians have been added.
 17 **A. Yes.**
 18 Q. Yes?
 19 Can we also look, please, by way of comparison, at
 20 their working strategies. Mr Lawler's is at page 454,
 21 so the next page, and Mr Granby's is at 1272, also the
 22 next page.
 23 **A. Yes.**
 24 Q. I am not going to go through all of these in detail, but
 25 is the significant addition being Mr Granby's addition

Page 182

1 at the second bullet point, "The working strategy is to
 2 minimise any cash in transit custodians"?
 3 **A. Yes.**
 4 Q. Were these changes made because of information provided
 5 by you to Mr Granby on the basis that specific
 6 intelligence indicated that a robbery was likely to
 7 involve a cash in transit target?
 8 **A. No.**
 9 Q. Why were the changes made?
 10 **A. Because it was one of the considerations.**
 11 Q. But a sufficiently strong or significant consideration
 12 to require the addition of cash in transit as a specific
 13 risk and to be included in the working strategy.
 14 **A. Yes.**
 15 **As a result of the intelligence from the night**
 16 **previous, and the following day's deployment, we knew**
 17 **there would be a cash delivery -- we had already had the**
 18 **information that it was going to be a cash delivery,**
 19 **I think some time around about noon. So it had to be**
 20 **a consideration.**
 21 Q. Can we just look at what Mr Granby says about this at
 22 H/29. You can put those two files away, thank you.
 23 THE CHAIRMAN: Can I just have a second to do that.
 24 (Pause)
 25 MR BEER: H/29.

Page 183

1 THE CHAIRMAN: Page 29 in?
 2 MR BEER: H/29.
 3 THE CHAIRMAN: H/29. Yes. Got it.
 4 MR BEER: This is part of Mr Granby's statement for the
 5 purposes of the defence of Sir Peter Fahy.
 6 **A. Yes.**
 7 Q. He says in the third paragraph:
 8 "As the TFC, I am required to change the tipping
 9 point after reviewing the intelligence available to the
 10 operation."
 11 **A. Sorry, sir, I am not with you here. On page 29?**
 12 Q. Page 29, third paragraph?
 13 **A. Got that.**
 14 Q. "As the TFC, I am required to change the tipping points
 15 after reviewing the intelligence and information
 16 available."
 17 **A. Yes.**
 18 Q. Yes?
 19 There is a section of an expert report which says
 20 that:
 21 "Conceivably, the document has only been used as
 22 a basis for the briefing to armed officers as the
 23 working strategy from the previous day's deployment was
 24 amended to include cash in transit personnel and has
 25 therefore been the subject of some revision. This

Page 184

<p>1 remains unclear." 2 Then he says, Mr Granby: 3 "The tipping points may not have been recorded in my 4 TFC log but they were read out to the operational team." 5 He records that Mr Stirling said: 6 "At 19.03 the TFC and SIO agree that a tipping point 7 for an intervention and the arrest of the three subjects 8 have been breached but it remains unclear which one of 9 the tipping points it was or whether it was 10 spontaneously agreed with them." 11 He says: 12 "The points required for the new authority on 13 3 March had only three points listed and there is 14 nothing unusual in operations of a similar nature. The 15 intelligence would have been the reason for the change 16 in the tipping points but, due to legislation, I am 17 unable to confirm or deny the source of the intelligence 18 I was acting on." 19 A little further down under the bullet points, 20 Mr Stirling said: 21 "I believe that the TFC entry at 19.03 shows that 22 the intelligence picture indicated that cash in transit 23 target was involved and that is why it was included in 24 the working strategy. The intelligence picture 25 indicated that the subjects were about to commit</p> <p style="text-align: center;">Page 185</p>	<p>1 Q. He says -- 2 THE CHAIRMAN: Hang on. 3 MR BEER: I am so sorry. 4 THE CHAIRMAN: That is all right. Yes. 5 MR BEER: He is talking about 2 March, Mr Dickinson's 6 witness statement, and he is a firearms commander. On 7 this day he was performing the role of force incident 8 manager, and he says: 9 "At approximately 9.05 on 2 March I was made aware 10 of an incident [and he gives the number] which was that 11 information had been received from GMP that a robbery 12 may take place in or around Culcheth and it would centre 13 around a cash delivery. Information was non-specific 14 and there was no indication as to any time, date, 15 persons or vehicles involved. There was also no 16 specific intelligence as to whether firearms would be 17 used in any offence." 18 Do you know who briefed Mr Dickinson that there was 19 information that a robbery may take place in or around 20 Culcheth and it would centre around a cash delivery? 21 A. No. The fact that it is created as an incident would 22 suggest that somebody has rang that in as an ongoing 23 incident. I don't know if we can see the incident log, 24 because that would probably help us? 25 Q. That is the kind of interesting thing that I will</p> <p style="text-align: center;">Page 187</p>
<p>1 a substantial offence. The police were required to put 2 in place an arrest tactic before the robbery was 3 committed in order to protect the public. The 4 intelligence information indicated where the subjects 5 were located and I made my decisions based on that 6 information. I cannot confirm or deny the source of 7 information I was acting upon." 8 Did you agree with Mr Granby that the intelligence 9 picture indicated that a cash in transit target was 10 involved? 11 A. No. There was never any kind of indication as to 12 exactly what any targets of robbery was going to be. 13 Q. Did you liaise with a Cheshire officer called 14 DI Dickinson? 15 A. No, not that I recall. 16 Q. Are you aware of anyone within your team that liaised 17 with DI Dickinson? 18 A. No. When was this? 19 Q. At about 9.05 on the morning of 2 March. 20 A. No. We had worked nights so the team wouldn't have 21 actually been on duty then. 22 Q. Let's see just what he says before we break for night, 23 and perhaps finish on this, with the Chairman's 24 position, at M/65, please -- M1/65. 25 A. Yes.</p> <p style="text-align: center;">Page 186</p>	<p>1 research overnight, but you didn't say to him, and you 2 are not aware of anyone saying to him, that the robbery 3 would centre around a cash delivery? 4 A. No. 5 Q. So you don't know where he has got that from? 6 A. No. 7 Q. We will come back to the question you ask and, more 8 particularly, the research that was conducted to see 9 what cash in transit deliveries there were on 3 March. 10 A. Okay. 11 MR BEER: Sir, is that a convenient moment? 12 THE CHAIRMAN: Yes. 13 10.30 tomorrow. Thank you. 14 A. Yes, sir. 15 (4.30 pm) 16 (The Inquiry adjourned until 10.30 am the following day) 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 188</p>

1	I N D E X	
2		
3	MR ROBERT COUSEN (continued)1	
4	Questions from MR BEER (continued)1	
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12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
	Page 189	

A				
A4 30:21	101:22 102:5,21	80:10 81:16	amount 18:17	48:13,14 88:8
A6 7:12 140:16	104:5 105:6,15	AFOs 1:8 11:21	19:10	117:15 154:6
Aaron 93:10 98:24	activities 25:19	44:24 47:22	amounts 42:2	anyway 25:1 35:7
101:12 140:18,19	139:13	afraid 41:2 78:24	54:10	96:7 111:9,19
140:20 146:23	activity 32:4 33:10	118:17	analyse 101:1	apart 123:4
147:21	48:18 85:6 98:7	afternoon 19:11	analysis 86:8	apologise 54:16
ability 73:23 74:1	99:20 105:23	51:1,6 82:1 83:5	Anderson 119:12	Appeal 121:5
75:8 135:19	106:4,7 157:5	83:10	119:21,22 120:1	appear 120:1 130:9
able 11:14 20:3	actors 146:16	aged 145:12	120:12,18 123:1,9	appeared 3:3
26:12 66:5 84:4	acts 157:24 163:17	agencies 142:20	124:12 130:6,16	103:25 120:1
87:7 156:15	actual 2:6 9:16	ago 76:12 79:17	133:1,2	121:9 124:13
159:22 176:20	34:4 43:5 49:1	168:10	Andrew 14:21 15:2	155:17
absolute 135:18	131:18	agree 7:2,5,5 74:21	38:15	appears 5:16 47:21
absolutely 7:19	Adam 148:13	106:8 159:24	Andy 85:13	102:17 121:13
49:10 117:15	add 69:21 110:14	163:2 164:5,6,17	Anne 178:25	application 66:8
135:8,18 163:12	110:23 181:1	164:18 167:20	Anne-Marie 178:6	applications 36:23
ACC 65:11 68:6	added 111:17	169:5 185:6 186:8	179:1,3	applied 113:19,20
72:22 79:8,9	179:17 180:4	agreed 158:8	annotated 95:5	114:21 161:21
82:19	182:16	160:25 161:5	anonymous 107:2	apply 6:10 114:23
accept 15:12 44:2	adding 181:20	162:10 163:11	ANPR 141:24	applying 101:2
149:18 154:21	addition 101:9	167:18 168:6,8,16	answer 6:21 16:4	appointed 85:7
accepted 13:21	181:3 182:14,25	170:18 173:12	17:24 41:20 65:21	87:9,11
access 7:12 10:8	182:25 183:12	185:10	67:18 70:24 75:12	approach 161:17
21:15,24 24:5	Additional 56:19	agreeing 114:6	106:1 111:6,7,8	175:4
68:22 70:17,20	additionally 130:7	162:11 167:4	112:18 114:16,18	approaching 65:11
73:23 74:2,13,14	address 19:19 35:4	ahead 50:24,25	134:7 149:17	145:25
75:8 168:2 176:18	39:13	al 73:20	162:10 174:19	appropriate 36:25
177:6	addressing 137:1	albeit 174:16	answered 135:16	174:6
accessed 28:10	adjourned 188:16	alert 143:16	answering 135:14	approved 82:20,21
75:25	adjournment 55:6	allegation 123:18	135:25 137:17	168:14
accessible 89:3	94:19 96:10 146:8	124:17 126:7	antecedents 64:19	approximately
account 115:20	adopt 12:22 15:16	134:15 136:17	Anthony 14:15	145:13 187:9
173:24 174:6	advice 157:15,23	allege 23:12 134:16	19:2,3 24:16	area 45:4 51:22,24
accurate 1:12 17:5	advise 156:6	alleged 12:22	55:21 69:17 74:24	52:25 53:14,22
17:7 131:11	advised 151:15	Allen 80:9 81:15	87:14 93:9 98:24	56:24,25 105:21
act 159:5	155:13	83:4 84:6	101:11 104:2	105:24,25 142:6
acting 59:25 185:18	adviser 59:22 76:3	allude 154:18	110:22 111:16	156:24 171:17,18
186:7	77:16,17 78:2	alluded 117:19	113:6 115:15	173:24 177:16
action 164:20 176:6	80:5,15,20,24	alongside 11:12	121:13 122:7,16	areas 142:12 156:8
176:12	81:5 82:23 83:22	169:10	123:1 124:15,19	157:3
actions 68:13	84:1,2 85:8,12	alteration 111:23	130:20 133:5	armed 2:20 68:17
actively 56:25	175:18	altered 131:17	134:16,21	68:19 78:11 90:23
90:22 93:5 98:14	adviser's 62:15	amber 174:2	anticipated 11:22	93:5 98:18 100:16
98:18 99:4 100:23	76:18 81:11	175:10	13:5	100:22,23 101:7
	advisers 59:13	amended 184:24	anybody 37:12	101:14,17 102:1,6

102:22 103:2	64:14 65:20 66:5	34:15,16 52:24	75:21 79:21 86:18	126:6 127:18,20
104:6 105:15	71:10 82:5 85:6	57:3 61:13,15	93:13 95:12	128:1,10 129:17
107:10 184:22	87:23 110:6	104:25 140:16,23	102:18 103:22	136:24 143:23
arrest 6:20 57:4	148:17,17 149:1,8	156:23,25 157:2	116:4,5,13 121:6	146:1,3,6,10,13
114:1 156:2 160:1	149:9,18 163:18	158:25 159:8	125:20 127:15	156:14 167:13,16
166:11 167:1	164:4,11 179:15	162:4 169:13	144:4 153:21	179:20,22 183:25
182:6 185:7 186:2	180:2,25 181:16	August 129:25	154:10 162:14,16	184:2,4 187:3,5
arrested 14:4 16:12	181:21 182:15	authorisation	166:11,13 172:5	188:11 189:4
105:9 125:18	assessments 181:23	115:21	176:9 188:7	begins 97:4,7
165:24 182:6	assets 153:19,24	authority 48:21	bag 35:14,15 37:16	behalf 112:18
arrests 4:7 16:13	assiduous 137:10	56:16 64:20 66:7	balacclavas 157:9	179:1
16:18,18 129:20	assist 87:7 159:4	66:14 69:18 79:8	158:5	behaviour 163:20
158:17	assistance 40:24	82:19 114:23	balance 152:23,25	belief 114:19 142:9
arrived 160:16	163:10	161:3,6 168:7	155:21,25 166:16	beliefs 142:4
arrives 140:15	Assistant 59:4	185:12	balancing 164:8	believe 57:4 99:18
arriving 43:3	assisted 135:18	automatically 6:18	Baltic 176:13,15,25	106:25 125:21
articulate 54:4	associate 93:12	6:20,22 7:24	177:3	143:3 147:19
articulated 54:17	146:15	15:22 88:13	bank 68:20 91:1	159:2 171:18
ascertained 139:21	associates 92:21	available 80:14	162:21 166:19,21	185:21
asked 6:12 36:17	associating 18:12	154:7 184:9,16	banks 42:1 90:23	believed 12:12 18:4
36:17 58:4 61:9	18:23,23	avoid 141:3 142:19	92:17 93:6 101:7	39:12 68:18 70:17
61:22,25 62:3	assume 16:10 99:24	Awaiting 178:25	102:6,22 103:2	105:24
63:1,5,8 65:24	135:6	aware 8:19 12:17	176:16 177:14	benefit 95:13
66:20 67:10 87:3	assumption 180:12	38:18 54:11 69:8	based 6:14 7:5 33:1	best 16:3 38:4
87:4,13 89:19	attach 144:6,21	69:8,10,11 86:22	110:10 149:9	118:23 135:18
108:3 134:4,5	attached 26:24	108:20 109:1,4	169:8 186:5	181:11
135:15 136:12,16	32:2 81:24 82:6	110:18 111:2	Basically 79:20	better 15:18 119:19
136:20 137:16	110:1 143:15	115:9 135:5 139:3	basis 6:12 12:9	beyond 139:13
146:10 155:17	145:17	139:4,25 144:23	31:13 32:15	big 7:23
asking 15:18,20	attack 92:16	169:9 173:22	112:13 114:11	bigger 103:21
16:2 17:13 46:17	162:22	174:10 186:16	138:17 142:9	bin 37:16 39:1
64:25 66:25 84:24	attempt 44:11	187:9 188:2	162:19 183:5	binder 118:14
91:25 112:24	139:19	awareness 141:17	184:22	bit 2:20 6:13 34:4
114:18,18 116:13	attempted 119:5		bear 9:18 100:4	66:1 73:10 78:9
128:20,21 164:14	120:8,20 121:10	B	154:8	80:17 95:12
177:5	attended 77:5	b 36:23 37:10,13	bearing 69:24 70:6	116:16 118:7,13
aspects 18:14	158:13	61:8 126:2,11	162:19	127:17 162:13
assess 23:21	attending 39:7	B2 63:10	Beer 1:3,4,6,7,7	164:15
assessed 147:22	attention 8:12	B25 99:23	22:15,18 41:5,7	bits 114:9
assessing 90:25	50:16 142:19	back 3:16 7:10 9:8	55:3,9 71:24	black 30:17 31:10
assessment 5:7	144:10	9:10 19:18 29:15	94:11,14,16,20,23	37:16 39:1 91:4
19:12,22,24 21:11	attributes 69:15	41:24 42:23 48:15	95:7,9,12 96:4,8	140:15 145:13,13
23:22 34:24 35:1	Audi 7:12 10:8	48:16,22 53:1	96:12,13 109:18	145:14
35:15,17 37:14	11:16 12:14,15	63:20 64:6 65:6	118:22 120:16	blacked 175:4
40:16,19 41:23	30:21 32:8,9,11	66:2 67:16 74:25	121:25 122:18	blank 59:11,19

60:16 115:19 177:15 178:13,14 178:19,20 block 19:21 blocked 142:14 175:5 Bloggs 177:4 BMW 104:24 bob 31:1 bobble 30:17 bold 27:11 117:23 134:15 bolts 171:11 book 33:13 35:20 48:6,9 52:19 56:17 59:4,14 60:10 62:10,14,16 62:16 71:25 150:19 151:6,22 157:17 178:1 booklet 56:16 boot 30:25 31:1,11 31:15 32:13,25 33:12,20 34:2,13 39:25 49:23 157:2 Boothtown 10:9,19 11:16 56:24 171:17 173:4 boring 36:24 borne 106:4 Boss 110:14,23 bottom 7:11,13 9:23 30:20 32:7 34:10 55:18 85:3 121:23 125:24 bottoms 145:14 box 32:7 boxes 99:9 Bradley 93:10 98:25 101:12 147:21 branch 138:9 178:19 breached 185:8 break 53:19 55:4	96:7 153:2,14 186:22 brevity 43:12,15,16 43:19 44:11 bridge 115:7 brief 7:20 13:3 20:7 21:2 69:1 78:14 79:7,24 80:24 83:4 114:24 117:16 briefed 13:25 46:3 47:12 48:12,14 50:3,4 51:1 52:3,4 52:11 55:19 69:4 75:4 76:24 77:18 81:4 85:7,11 86:3 149:24 173:2 187:18 briefing 1:7,11,20 2:8,13 3:12,19,19 4:2 5:3,5 8:6 9:9 9:13 11:21 12:19 13:3,4,12 20:13 20:16,17 26:6 29:9 42:11 43:5 44:19 45:20,22,25 46:18,20 47:16,18 47:21 48:15,17,19 48:20,20,23 49:8 49:17 51:13,25 53:7,10 55:10,23 56:2,6,13 65:16 65:17 67:19 68:6 73:11 76:3,13,21 77:17 80:2,20 81:24 82:2,5 83:15 84:2,5,7,22 84:23 91:14 114:10,24 115:3,6 115:10 117:8 158:14 160:11,18 160:19 168:3 171:2 179:10,11 179:15 180:2,15 184:22	briefings 2:5,10,11 2:12,15 12:25 21:1 73:4 74:11 138:19 briefly 86:6 112:21 bring 110:8 broke 68:20 broken 101:19 brother 134:25 brothers 93:10 98:24 101:12 104:19 146:22 147:23 brought 34:22 72:21,24 73:11 Brown 148:13 Bs 125:24 building 83:12 88:21,22 90:23 91:1 93:6 101:8 102:6,22 103:3 115:7 176:16 bullet 38:22 40:24 41:7 43:25 183:1 185:19 bundle 4:25 22:2 23:9,9 53:2 84:25 94:12,14,19,21 95:1 118:17 141:9 167:11 176:5 bundles 95:1 Bureau 115:22 Bury 91:2 bush 44:15 45:7,10 45:16 46:11 47:10 52:17 bushes 50:7	75:14 84:9 96:23 164:22 Callaghan 151:13 called 25:16 69:15 148:13 152:13 186:13 calling 30:22 50:6 80:9 158:20 capabilities 5:7 capability 56:22 70:11 71:10,10 74:10,14 capable 15:12 captured 111:18 car 10:18 12:11,13 30:25 31:15,15 32:13,25 33:12,20 34:2,13,14,23 35:8,11 39:25 43:4 45:2 56:23 93:22 142:6 144:8 151:17 159:18 160:3 162:8,17 174:17,18,24,25 175:4,8,13 careful 84:18 carefully 41:18,20 44:2 carried 133:19 carry 1:15 50:18 carrying 38:23 39:12 145:14,18 cars 142:6,11,11,22 carved 131:4,4 case 6:23 10:13 15:18 47:8 65:22 67:12 78:10 105:8 109:12 114:21 134:20,23 151:13 151:15,25 152:10 174:7 casebook 18:10 37:21 47:21 78:25 150:5 156:19 cases 155:18	156:13 cash 42:3 54:10 90:24 93:7 101:9 102:23 103:4 175:22 176:13 177:10,14,22 178:10 179:5,16 180:3,9,16 181:1 181:21 182:15 183:2,7,12,17,18 184:24 185:22 186:9 187:13,20 188:3,9 category 58:8 caused 37:12 131:2 147:19 ceased 88:1 centre 44:15 145:5 145:15,18 178:10 187:12,20 188:3 certain 75:19 117:15 certainly 13:9 17:10 19:17 21:6 24:20 26:15,18,22 47:23 52:4 54:21 55:2 65:24 66:20 66:25 67:17 71:4 74:3 117:4 144:15 154:21 173:15,16 181:3 cetera 86:14 126:2 139:15 151:18 chairman 1:3 17:25 22:14,16 41:1,2,6 48:5 55:4 71:23 94:10,12,15,17,22 95:3,8,11 96:6,12 109:17 118:16,17 118:21 120:15 121:24 122:17 126:4 127:17,19 127:24 128:8 129:16 136:23 143:21 145:25
C				
C 37:10,11 126:8 126:11 cadre 64:13 79:7 117:17 134:2 cadres 28:15,20 call 43:12,14 65:15				

146:2,5,12 156:13 167:12,14 179:19 179:21 183:23 184:1,3 187:2,4 188:12 Chairman's 95:13 186:23 chance 2:10 change 169:17,23 179:14 180:1,25 180:25 184:8,14 185:15 changed 149:6 changes 183:4,9 Chapel 171:16 charge 120:2 129:23 156:6 157:7,16,24 158:1 166:11 167:7 charged 75:9 118:2 121:14 125:19 126:24 127:13 128:4,20,21,23 129:21,25 130:7 130:16 133:5,6,11 134:21 charges 118:8 charging 152:23 153:23 155:23 chaser 129:10,12 chasing 129:1 check 38:3 61:4 128:11 checked 94:19 checks 110:6 Cheshire 186:13 Chief 3:15 8:7 59:4 60:9 66:7 73:18 76:13 160:7 181:15 Christmas 86:12 Chronological 89:1 chronology 21:25 22:24 23:16,17 24:6,13 25:5,16	26:7,20 28:7 29:4 29:12,16 57:20,23 57:24 58:9,12 60:20,22 70:23 88:19 89:14,17 96:14 102:18,19 108:7 111:12 146:21 CID 129:23 circumstances 159:20 City 7:23 8:1 civ 177:11 civilian 177:12 178:7,8 Clark 64:18 65:3 176:9 177:9 clear 25:9 36:10,14 42:16 56:25 58:3 106:15,19 128:22 164:1 180:24 clearly 7:22 10:4 14:17 15:15 17:6 63:25 83:17 CLIO 176:6 close 93:8 98:23 101:10 146:22 147:12 165:3,8,10 165:13 174:8 closed 29:2 58:15 69:22 70:2,3 157:4 159:15,23 159:24 169:19,21 170:8,15 clothed 159:13 clothing 31:2 106:25 107:2 157:8 158:4 159:13 cocaine 93:12 97:20,22 98:6 coincidence 48:5,8 48:12 collar 128:11 colleagues 116:7	collection 86:8 87:12 88:13 177:1 column 57:10 59:10,19 60:16 61:8 62:15 72:12 72:17 come 9:8,9,10 25:23 29:15 31:17 33:8,15 34:20 40:1,1,3,4 41:23 45:1 47:24 54:23 55:2 62:17,19,20 63:1 65:15 66:2 69:12 70:1 74:25 75:21 83:13,20 111:18 136:19 142:13 146:11 148:10 154:10 155:1 165:20 166:25 167:23 188:7 comes 15:2 98:1 156:16 coming 6:25 19:6 83:5 102:2 112:19 148:11 149:16 174:1 177:3 command 59:22 commander 27:15 59:23,24 67:20 68:8 72:12 74:19 85:7 114:22 158:17,19,21 168:7 187:6 commander's 76:6 168:11 commanders 72:15 111:21 113:3,13 114:9 commence 178:10 commenced 67:25 commencing 129:24 177:17 comment 67:5 72:7 111:23 133:7	comments 2:6 commission 90:22 93:5,23 97:24 98:14,18 101:7 102:5,21 104:5 105:6 142:16 163:17 commit 4:6 15:8 68:17 70:18,21 71:14 73:24 74:7 93:8 98:22 101:10 101:16,25 106:20 134:22 139:19 185:25 committed 6:10 105:7 107:6 186:3 committing 92:15 99:4 100:22 101:14 105:11,15 130:16 163:16 common 62:25 103:17 144:7,11 144:11 comms 31:12 communicated 31:12 communication 151:17 177:7 companies 175:22 177:3 compare 98:10 181:22 comparison 137:23 182:19 compatible 129:6 compiled 115:18 complete 57:17 123:13 131:22 148:25 completed 26:16 67:25 110:9 148:16 171:13 completely 14:22 17:5,7 21:21 51:8 66:15,16,19	135:15 162:12 179:18 completing 139:11 compound 45:4 comprehension 54:15 85:25 conceal 105:20 conceded 43:25 Conceivably 184:21 concept 22:24 23:17 concerned 41:9,12 61:20 76:4 154:23 175:21 concerning 118:7 concerns 71:17 74:22 175:25 conclude 139:16 conclusion 14:18 40:17 66:6 conditions 27:7 conduct 5:10 112:17 172:20 174:11,25 175:22 conducted 107:25 135:11,21 188:8 Conducting 105:13 conference 72:18 confirm 70:2 154:19 185:17 186:6 confirmed 45:14 54:6 confirms 154:19 confused 20:23 34:4 confusing 122:3 confusion 24:1 connection 54:5 Connors 30:2,13 35:10 47:6 conscious 159:3 170:11,12 consciousness 3:10
--	---	---	--	---

consider 164:8 181:3	conventional 139:3	74:16 89:13 94:8	166:24 167:1,3	culp 151:15 152:24
consideration 14:14 64:19 183:11,20	conversation 12:1 12:3 58:21 66:24 69:12 77:12 150:4 152:11,13,20	98:9 122:2 133:2 133:8 176:8	created 111:15 113:7 187:21	152:25 156:4,7
considerations 170:22 183:10	convicted 5:9 15:23 15:24 16:1,8,9	corroborate 163:15	creating 112:24	custodians 179:16
conspiracy 74:25 75:10 119:6 121:12,16 122:7 122:13,21 125:19 129:23 130:8,14 130:22 133:12 134:22	convictions 6:14 7:5 14:5 16:25	costs 119:24 122:22	crime 4:22 5:24 36:4 73:24 74:7 74:24 86:24 118:4 118:8 119:8,21 123:21,24 124:5 124:24,25 125:5,7 125:20 127:7,23 128:3 129:3,7 130:13,25 131:19 133:10 137:11,23	180:3 181:1,22 182:16 183:2
conspired 4:6 15:7 15:14	convoy 141:22,24 172:7	count 119:6,7,11,22 120:7,20,22 121:3 121:12,14,22,24 121:25,25 122:3,5 122:5,24 123:7	criminal 64:18 93:12 139:17 143:24 163:19 164:12	custody 130:9
Constable 59:5	Coordination 88:5 88:10	country 154:10	criminality 106:22	custom 112:8
constable's 112:12	cope 41:3	counts 119:4 123:13	cross 50:23	cut 126:8
constables 112:23	copied 27:12	couple 85:15,15,16 89:8 114:5 177:24	Cross-reference 56:22	CVIT 176:17,19
constrained 116:24	COPU 61:2,4,24 63:2 91:3,8	course 7:15 12:2,6 12:19 14:17 22:21 37:8 38:12 43:20 51:13 113:7 128:11 133:18 134:18 148:7 160:17 169:1	Crown 130:10 131:15,17 132:14 132:23	
contact 19:6 45:1 73:18 79:6,10,15 79:18,20	COPUs 88:21	courses 174:21	criminally 106:22	D
contacted 80:4	copy 24:5,12 25:17 26:19,21 27:1 32:2 89:20 99:8 108:6	court 29:2 69:22 75:2 119:20 120:2 121:4,4,7 122:10 124:13 125:21 131:4,15 132:14 132:23 159:15,23 169:19	crystal 36:14	D 189:1
contain 49:20 100:14 125:10	core 126:10	coverage 19:11 20:3	crystallised 35:23	dah 63:12,12
contained 35:16 134:17 135:5,23	Corkovic 26:3 104:19 140:18,20 148:14	coverings/means 151:17	Culcheth 37:3 42:1 43:4 44:14 50:18 53:13,22 54:7 56:25 106:9,20 156:25 157:3 162:7,9 165:1,4 165:21 166:1,16 169:15 171:19,21 172:2,9,21,24 173:4,5,14,25 180:18 182:4 187:12,20	dah' 63:13
contains 93:20	Corkovics 18:5,12 18:23 19:6,9 20:8 20:16 21:8,15,20 25:4,10,12 93:18 94:7 95:19 103:10 115:5 140:2,4 141:5 143:4,5 148:21 149:11	covert 139:3	culmination 166:15	dangerous 5:13,19 6:8 7:4 16:23
content 154:22	Corkovics' 25:18	coy 174:2	cure 126:11	dangerousness 5:17 6:5
contents 116:13	corner 175:6	CPS 23:11 57:4 129:22 134:16 150:25 151:12 154:19,20,22,24 156:22 157:14,23	current 110:5,10 currently 10:9 57:4 90:25 101:23 171:16	dark 30:20,20 31:2 107:1 175:5
contingencies 173:20,22	correct 3:17 5:25 7:21 8:23 9:2,24 10:11,25 11:17 13:24 14:1 18:15 20:6,9 21:10 37:4 43:1 45:18 60:2			dash 179:22
continue 23:24 47:11				date 20:11 38:3,5 57:11 68:16 105:17 110:5,8 124:9 125:5 127:1 127:3 128:6 130:1 130:13 187:14
continued 1:5,6 189:3,4				dated 28:5 127:4 133:21
continues 10:12 45:12 71:12 155:11				David 18:5,13 19:13 29:21 41:12 41:22 43:2 55:20 90:21 92:15,21,24 93:4,7,10 97:5,8 98:2,5,17,22 99:22 100:20 101:6 102:5,21 104:4,18,20 113:6 121:14 122:7,11 122:25 146:23 147:7 154:10
contractor 144:9				day 14:16 29:4 40:21 42:10,10 45:21,22 46:22 78:23 81:4 85:24
contravenes 140:24				
control 20:15				
convenient 55:3 96:5,6 188:11				

112:25 121:16 143:2 151:3 168:22 180:15 181:8 182:1 187:7 188:16 day's 183:16 184:23 day-to-day 138:17 days 47:22 63:21 72:8 85:15,15,16 86:2 106:12 154:9 177:16 DC 30:2,13 33:7 39:6 47:6 49:19 64:18 65:3 86:10 87:1,19 88:3,16 112:5,18 113:9 115:3 127:7,11 129:17 151:23 152:11 156:19 157:10 158:3 159:10 166:23 176:9 177:9 DCs 155:8 deadline 127:12 deal 91:6 94:10,18 94:20 96:4 137:6 146:10 dealing 1:7 23:18 28:7 64:9 110:17 179:10 dealt 28:12 176:16 death 85:18,22 Debbie 77:4 87:3 108:21,25 Deborah 111:2 debrief 38:14,15 140:14 143:11 debriefings 138:19 December 140:11 178:3 decide 129:22 decided 110:6 decides 69:18 decision 20:2 56:7	76:7 82:24 110:9 127:20 143:6 152:19,23 153:21 153:23 155:14,23 170:12 decisions 81:2 114:10,23 125:21 186:5 dedicated 51:19 deem 167:2 deemed 116:2 164:20 defence 22:21 108:2 184:5 defendant's 119:24 122:22 defendants 129:21 definitely 84:13 157:12 definition 156:4 degree 19:25 deliberately 170:10 deliver 177:15 deliveries 176:13 178:10 179:5 188:9 delivery 177:14 178:24 180:10 183:17,18 187:13 187:20 188:3 demands 8:14 deny 185:17 186:6 depend 151:16 dependent 156:7 depends 42:14 103:19 deploy 174:8,11 deployed 19:2 104:17 140:2 deploying 153:18 153:24 deployment 19:4 20:14,17 38:20 47:16 59:14 60:10 62:12 65:23 66:17	66:19 69:9 72:1 76:19,24 78:10 80:5,16 81:13 85:18,21 162:19 171:12 183:16 184:23 deployments 19:1 68:12 depot 105:21 depth 63:22 deputy 28:11 77:7 176:9 Derek 127:5,23 129:17 describe 33:14 126:15 described 43:22,22 78:7 115:14 180:22 describing 43:20 50:10 159:6 description 7:3 78:9 desk 126:3 despite 60:14 117:2 detail 6:14 8:12 15:6 69:2 94:10 94:18,20 101:2,3 168:8 169:19 174:13 182:24 detailed 96:17 details 80:5 125:20 detective 42:12,15 56:11 112:12,23 detectives 112:23 determine 63:14 determined 70:12 determines 72:24 develop 18:7 31:17 development 29:19 39:18 87:10 88:6 developments 87:20 develops 39:15 devices 104:24	di 63:12,13 152:10 186:14,17 Dickinson 186:14 186:17 187:18 Dickinson's 187:5 died 16:6 difference 88:12 101:17 135:8 different 12:25,25 18:14 22:4,13 33:4 43:20,23 51:8 65:19,25 66:15,16,19 72:9 85:21 87:9 88:4 97:12 99:3,21,25 100:1,7,9,13,14 101:21 103:15 113:25 115:10 124:20 135:15 141:19 173:13 differently 100:12 difficult 159:14,19 direct 45:1 73:8,14 176:20,23 directed 131:20 direction 119:23 120:4 122:14,22 137:19 directions 123:15 directly 24:9 62:18 68:25 71:4 88:5 disagree 15:11 disagreed 15:9 disappeared 170:5 170:7 discharged 119:23 discount 147:11 discover 82:18 84:11 125:16 175:22 discovered 135:12 discuss 29:1 77:19 83:18 84:17 150:3 155:19 156:22 159:22 170:16	discussed 140:14 150:24 153:16 158:16 165:18 168:22 169:6,21 173:10 174:12 discussing 155:15 discussion 72:22 150:10,13,16 151:20 152:18 155:12,24 160:7 160:17 164:7,16 168:5,24 175:12 175:17 discussions 151:5 152:9 175:16 dismissals 123:14 dismissed 134:24 displaying 7:13 disposal 129:4 disseminate 116:12 disseminated 103:20,23 115:20 dissemination 86:8 115:19 117:6 distinguish 25:6 distorted 41:3 divided 96:22 divider 136:23 divides 5:12 division 4:16,16,18 4:18,19 document 24:18 26:7 27:8 28:10 28:15 49:9 57:16 60:20 70:23 72:15 82:5 91:11 98:11 110:2 112:1 113:2 114:2,3 115:10,18 115:20 118:10,14 120:17 132:16 133:7 134:3 135:7 135:22 152:2 160:2 168:20 184:21 documented
---	--	--	--	--

152:24 168:19 169:8 documents 35:22 78:25 89:7 92:25 112:6 113:18,20 116:1,1 117:18 169:10 doing 50:1 59:1,2 65:19 74:3 81:6 84:3 86:5,6 88:16 114:8 132:5 149:5 153:25 175:7,14 door 54:25 download 105:2 draw 50:16 66:6 144:9 drawn 40:17,18 drew 165:20 drive 110:15,23 142:14 driver 11:24 12:7 12:10 13:6 93:22 driver's 31:3 drives 32:10,10,13 driving 13:10 45:9 45:11 140:22 141:2,16 144:8 drop 176:18 177:1 177:21 drop-offs 175:23 176:1 dropped 32:11 drops 175:24 177:16 178:14 drugs 98:2 DS 27:19 46:18 87:4,16,16 88:15 109:9,11,23,24 155:7 176:10 DSU 30:4 46:19 83:8 104:17 138:13,14 140:9 140:14 143:11 DT 38:23 39:9 41:12	due 14:17 31:12 41:12 128:11 139:4 157:2 169:20 185:16 duty 23:21 51:20 79:6 80:10,11,14 80:15 83:13 112:7 178:11,12 186:21 <hr/> E E 50:16 152:4 189:1 earlier 2:15 8:6 19:16 42:10,10 43:25 45:20,22,23 58:4 77:3 89:16 145:11 146:13 early 1:8 50:19 51:3 86:18,19 104:10 easiest 95:3 easily 88:23 89:3 139:21 East 32:10 education 54:1 effect 17:20 effectively 3:10 8:11 18:7 21:3 26:2 96:22 eight 5:6 41:7 either 2:8 17:17 58:19 62:18 77:13 79:8 82:12 88:14 109:1 124:18 151:3 elapsed 104:10,14 element 29:19 eliminated 133:14 133:16 Ellis 123:1,6 130:6 132:23 Ellison 62:19,20,21 63:19 64:3,15,17 64:21,25 65:8,15 66:1 78:1 154:19	154:19 else's 152:1 email 2:18 31:21 33:25 49:20 56:20 61:1 109:8,9,15 109:23 110:20,21 154:17,21,22 emailed 27:4 emails 3:7 110:19 emblazoned 7:19 emerging 44:14 45:10,16 46:11 47:10 50:7 employment 139:15 enabled 105:2 encompassed 133:13 encompassing 75:10 133:12 encountered 144:14 ended 148:14 162:11 163:1 ends 97:2 151:19 enforcement 142:20 engaged 2:20 98:8 163:19 164:11 England 68:18 enter 112:22 entered 131:15 132:14,23 enterprise 163:20 164:12 enterprises 100:2 entrance 45:5 entries 14:6 29:12 29:17 90:3 141:11 entry 30:9,12 31:6 31:9 40:20 68:1 79:4 81:20 82:1 82:16 105:14 117:22 140:11 141:14 142:23	143:1,10 150:10 151:8,19,24 157:19 178:3 185:21 equivalent 59:4 62:14 65:14 erroneous 134:17 135:5 137:12 error 13:21 129:5 135:6,21 errors 51:16 essence 14:22 Essentially 159:1 establish 14:10,12 85:11 176:1 177:21 established 15:10 15:13 16:15,22 177:6 179:4 et 73:20 86:14 126:2 139:15 151:18 Evaluation 127:20 evening 25:8 41:13 50:19 51:3,6 91:23 98:8 evenings 106:8 event 25:24 33:9 61:6 72:17 132:18 161:5 events 43:20 140:9 156:23,24 evidence 15:6 23:14 29:23,24 31:14 37:2 43:1 44:13 45:15 57:4 89:8 105:5 106:13 106:15,18,19,23 112:5 113:9,11 114:19 141:16 143:23 144:17 147:11 152:12,14 152:19 153:4 155:4,25 157:6,16 166:5,6,6 167:2	170:8,15 181:11 evidential 57:6 150:25 158:16 159:6,17,25 164:8 evidentially 166:3 exactly 9:17 34:17 42:17 58:5 101:6 157:12 186:12 exaggerate 17:8,11 17:13,18 exaggerated 17:2 74:18,21 exaggerates 17:14 exaggerating 17:20 exaggeration 16:24 43:11,12 44:3,4 examination 50:23 126:19 example 11:5 54:13 65:13 77:21 89:14 89:23 106:16 116:4 139:14 148:13 examples 62:6 176:4 177:24 exchange 89:17 excising 106:14 exclude 20:3 exclusively 169:20 170:8 exercise 118:19 existent 160:1 exit 145:14 expect 12:24 16:9 57:16,17 117:18 expected 15:24 Experian 110:6 experience 23:19 experienced 63:22 174:15 expert 184:19 explain 8:13 11:20 11:21 43:10 47:19 47:23 52:14,15 54:3 159:14,19
--	---	---	---	--

explained 40:15 102:15 125:6 131:6,8 137:20 explaining 159:14 explanation 7:20 expressed 100:12 expressing 43:18 expression 146:16 extent 8:11 eyeball 52:24	168:18 fairly 141:19 142:15 143:5 fairness 110:19 fall 78:16 167:5 false 50:3,4,6,10 54:8,19 56:23 61:15,16 69:14 92:25 105:20 familiar 79:4 famous 130:7 fan 7:23 far 71:17 74:22 147:8 feasible 139:19 feature 148:15 featured 147:8 148:5,6 179:17 180:4 February 1:1 3:20 18:2,18 20:7,12 20:21,25 29:21 30:5 38:5 41:16 48:4 53:13,21,21 53:25 87:18 106:1 133:21 148:23 156:24 fed 144:4 feel 24:17 116:24 felt 152:18 fence 45:8 fewer 43:18 FIB 108:7 109:5 110:18 115:7 116:13 117:4,13 135:5,7 138:14 fifth 96:2 106:11,16 Fifthly 16:21 file 6:1 41:1 44:17 55:15 56:7 75:3 76:2,5,7,16 115:11 119:13 121:3,10 123:16 124:18 126:21 132:14 133:8	134:8,11,19,25 140:6 145:8 152:4 167:10 170:22,23 179:7 files 64:6 134:8 181:14 183:22 fill 61:21 filled 72:8 final 164:22 financial 41:13,17 42:1,7,20 44:5 46:7,12 47:9 50:7 51:23 54:9 176:17 fine 94:12 95:6 131:23 finish 11:8 48:7 186:23 fire 114:11 firearm 75:11 firearms 3:12 4:6 8:23 12:16 15:8 15:19 16:2 17:3 20:8 21:15,19 25:19 27:15 40:23 46:1 48:21,23 54:24 59:22,23,24 64:13 65:23 67:20 68:8 70:14,17,20 72:12,15 73:4,23 73:24 74:2,7 75:8 76:6 83:11,18 84:15 85:5,6 111:21 113:3,12 113:13 114:8,10 114:25 115:3 117:8,16 118:2 134:1,2 149:11 153:19 158:13,17 158:19,21 161:3,6 168:7,11 173:2,10 174:14,16,21 179:15 180:2 187:6,16 firm 130:7 first 1:14,20,21	2:20 3:2 4:3 7:23 10:2 13:18 20:13 20:14 22:4 38:10 48:16 60:23 68:1 71:25 81:20 82:16 85:15 90:13,19 96:25 97:23,25 98:10,13 99:3,3 99:10,19,21 100:16,19,22 102:17 110:17 118:7 120:16 122:20 154:24,24 158:9 163:21 171:13 174:18,25 179:22 Firstly 115:24 181:7 FIS 61:24,25 63:2 fitted 123:19 Fitton 3:15 42:11 49:2,3 85:13 Fitton's 50:15 76:19 five 13:15 19:23 43:23 64:4,19 106:12 131:17 133:10 flagging 181:9 flats 19:21 flexibility 162:1 flick 151:22 flicking 8:25 floor 83:11 flow 57:1 87:24 88:1,7 fluidity 23:19 focusing 155:3 folder 143:19 158:9 folks 1:20 follow 6:2 25:3 87:18 92:16 105:14 168:14 180:8 followed 168:20	following 32:21 33:6 49:7 54:10 82:13 137:10 140:24 153:18 182:1 183:16 188:16 follows 3:14 116:24 124:17 177:10,17 foot 24:4 44:22 64:9,12 108:4 109:8,23 117:23 139:2 151:11 174:11 footage 32:22 33:2 force 70:14 111:3 115:21 138:9 187:7 forensic 126:18 139:6,8,24 forensically 139:4 forgive 23:5 form 103:12,17 106:21 formal 84:22 152:17 format 72:9 88:20 88:23 103:25 forward 3:8 27:13 27:14,14 forwarded 27:12 27:16 33:24 109:9 Foulkes 108:3 136:8 found 32:21 120:3 126:5 132:25 137:11 foundation 75:6,22 four 5:12 19:23 64:4 106:9 119:4 122:25 155:7 160:14 165:25 173:25 fourth 4:11 16:11 28:9 95:25 170:5 170:7,12
F				
F 126:14 167:11 170:22 F/11 115:11 F/1271 181:16 F/1273 167:10,10 face 33:18 34:1,12 37:2,4 50:2 82:9 132:1,15 160:1 Facebook 116:21 faced 118:9 facilitate 68:22 fact 13:7 15:10,13 19:18 22:4 27:13 27:22 32:22 34:24 38:4 49:5 51:18 52:2 54:6 61:17 69:9 75:9 92:3,7 102:2 112:10 115:2 124:12 130:16 134:20 141:18 143:2 145:19 153:16 154:15,18,20 157:2 161:8 162:18 165:7,15 187:21 factual 75:22 Fahy 108:2 184:5 fail 182:6 fair 19:8 34:24 35:1 37:14 40:16,19 63:18 65:6,20 66:6 113:15 136:1				

FR 111:3	general 125:16	48:25,25 49:9,10	gold 72:22 73:8,12	69:1,4,8 70:19
frequently 142:15	152:12 181:25	49:24 50:24,24	74:19	71:9 79:6,12 80:1
fresh 143:18	182:4,5	59:7 66:2 67:16	Golf 57:2	81:24 82:11,12,21
148:25	generally 61:8,22	73:4 84:2 95:1	good 146:1	82:22 83:10 84:16
Friday 12:1 55:12	86:7	101:3 102:18	goodness 116:8	90:5 91:15,21
63:23 65:14 82:20	generated 6:20,22	116:4,5,6 117:16	grade 59:18	93:16 95:17
112:5 151:4	getting 35:21 40:6	119:8,9,20 120:16	graded 35:23 57:14	149:24 150:11,16
friend 93:9 98:23	41:24 45:11 52:17	120:20 121:6,23	61:9 102:14	167:16 168:23
101:11 146:22	66:4 114:4 148:14	125:22 126:18	grading 57:12,18	170:18 183:5,21
147:12	171:21 172:2	131:22 134:1,2,9	58:24 59:10,24	185:2 186:8
front 31:2 115:17	174:7	143:19 145:8	60:4,18 61:10,12	Granby's 24:1 56:5
116:11	Gillian 88:3	146:3 153:15,21	61:18,19,23 62:4	66:10 82:25 89:19
full 84:3,5	give 6:21 7:19 13:1	157:22 169:18	62:17 63:1	169:11 181:16,19
fully 115:4,9	24:9,12 26:13	171:10 174:2,22	Grainger 4:3 6:4	182:15,21,25
function 88:12	37:23 58:11,17,22	176:25 177:2	6:11 7:3 12:10	184:4
fund 139:20	61:9 66:4 88:8	182:24	13:6,13,22 14:2	grant 69:18
further 39:15,18	91:8,18,19 93:15	goes 9:19 79:5	18:22 19:7 21:9	granted 66:7 82:19
64:18,25 65:3	112:1 113:5 127:3	119:7 126:8,13	21:12,20 25:10,25	161:3,6
110:8,25 129:20	127:8 153:9	137:6	26:5 32:4 55:21	Griffiths 14:9
139:19 155:22	171:12 177:5	going 4:10 9:8,10	57:2 69:17 71:18	113:10 115:15
163:13,15 178:25	given 1:11 4:4 8:6	15:5 31:17 33:8	73:20,22 74:1,6	135:13 137:15
185:19	9:24 20:2 21:24	37:6,8,10 44:8	74:22 75:7 85:19	Griffiths' 135:21
future 101:15,24	24:21,25 25:13	52:19 56:1 58:15	85:22 87:14 93:9	ground 47:15
102:12 139:20	26:10 47:22 48:24	64:5 69:22 70:1	94:7 98:7,24	group 4:12,14 5:13
FX 145:14	64:20 69:24 71:4	74:24 77:20 79:8	101:11 107:9	5:16 6:4,16,18
	83:15 116:18	79:22 80:1,16,18	109:5 110:22	16:3,21 36:4
	118:4 119:1 136:4	80:19 81:3 83:20	115:15 118:2,8	86:24 139:23
G	163:25 171:2	89:23 90:16 93:13	120:21 121:9,13	groups 5:13 20:4
G 60:16 143:19	gives 64:23 187:10	94:10,11,18,20,25	122:7,16,16 123:1	guards 92:16
G/593 71:23	giving 23:14 25:17	96:4,17,23 100:16	123:4,7 124:15,15	guess 69:13
G1 119:13	26:15	101:23 105:21	124:19,19,20	guilties 123:14
G1/1709 176:5	glaring 8:15	106:20,20 112:15	129:24 130:6,6,20	guilty 120:3 122:14
G1/3593 71:21,21	gloves 31:10 107:4	113:22 115:5	132:14,15 133:5	122:21 123:7
71:24	157:8 158:5	116:13 118:9	134:21 135:1	132:23,25
G2 122:11 143:21	GMP 36:7,24	119:8 132:9 134:2	142:5 157:1	gun 114:11
G2/1154 120:25	115:21 187:11	134:4 144:25	Grainger's 6:24	gunpoint 68:21
G2/1163 119:17	GMP's 72:11	146:3 153:21,22	11:22 17:2 21:16	gym 139:14 145:19
G2/1167 118:12	GMPics 75:25	154:9,15 155:1	121:7 134:16	145:20
G2/1674 140:7,7	118:10 119:9	162:21 163:1	Granby 1:21 10:20	
G2/1684 142:23	123:25 125:1,17	165:13,19 166:19	11:20 13:5 21:24	H
G2/1688 143:8	132:10 135:23	171:10,14 172:8	25:8 26:24 27:23	H 22:2 23:9,9
G2/917 143:19	137:11	173:12,24 174:4,5	28:21 29:3,11	H/29 183:22,25
G4S 105:21	go 13:2 30:9 31:21	176:24 177:5	46:1 55:11 57:19	184:2,3
gainful 139:15	35:4 36:3 37:10	181:14 182:24	58:24 60:3 63:22	hacksaw 3:6 29:20
gate 45:6,7	38:14 48:15,15,22	183:18 186:12	65:14,17,22 66:24	32:12,25 33:11,19
gathered 85:8				

34:2,13,22 35:5 35:16 37:3,15,19 39:3,9,25 40:10 41:13,16,23 42:7 42:20 43:2 44:5 44:15 45:10,17 46:8,13 47:9 49:21 50:7 53:12 53:20,24 54:5,6 54:14,20,20 157:2 162:20 165:14 166:10 halfway 9:21 157:19 hand 26:14 97:17 123:25 139:18 181:19 Handed 95:10 handgun 68:21 69:16 93:24 handheld 32:16 handing 57:19 handle 117:18 hands 175:8,15 handwriting 152:2 handwritten 26:22 Hang 116:5 187:2 happen 47:13 happened 19:5 27:22,24 31:18 38:18 42:17 46:22 47:13 52:14,15 55:1 77:24 78:23 102:9 128:3 138:6 160:6 happening 102:10 happy 137:14 hard 24:5 hat 30:17 31:1 Hazelhurst 30:21 headed 93:4 98:17 102:4,20 heading 110:22 hear 12:21 heard 12:23 38:10	45:14 112:5 113:9 173:11 174:23 hearing 6:2 58:15 hearings 70:2 heavily 90:14 93:11 97:8 98:5 heavy 152:16 153:6 153:13 155:6 held 68:20 113:15 Helens 105:24,25 156:24 157:3 166:14 help 83:3 84:12 99:17 109:21 163:9,13 187:24 helps 126:13 Heywood 68:6,7 72:19 73:13,25 74:6,9,16 75:3,18 77:12 79:8 161:17 Heywood's 62:9 71:25 77:11 hi-vis 144:7 high 25:14 61:19 139:14 142:11 144:1 155:8 182:7 182:10,14 historic 139:7 Historically 102:8 history 6:24 73:22 73:25 75:7 Hmm 123:23 173:22 hold 43:16 91:21 117:6 173:11 holdall 145:2,14,18 hole-punch 24:4 home 32:20 38:14 39:13 67:8 honest 32:21 109:2 111:9 162:10,12 honestly 6:21 28:23 60:6 163:2 Hopefully 126:2 hoping 90:18	horse 46:25 47:2,6 47:8 horse's 43:6,7 46:23 47:3 hostage 162:25 166:21 hours 56:11 64:4 64:24 178:11,20 hours' 64:19 House 65:16 114:14 housed 19:13 human 135:6,21 Hurst 27:19 77:4 87:4,16 88:15 109:9,11,24 111:2 176:10 hypothesis 20:4 <hr/> I I/51 138:22 Iain 147:3,13 ICI 70:12 idea 54:22 identified 147:2 identifies 5:8 identify 90:11 identity 105:21 147:6 Idgy 93:9 98:23 101:11 146:22,25 147:2,13 IDs 140:14 IDU 88:11 ignore 29:13 159:10 imagine 175:18 immediately 109:10 important 8:21,22 29:19 48:17 49:7 51:14,24 84:19 112:6 113:2 176:1 181:12 importation 97:19	impose 27:7 impression 64:23 inaccuracies 2:1 17:8,20 inaccurate 17:19 17:22 135:24 inappropriate 21:22 incident 3:6,13 46:4 54:12 69:2 166:13,14 187:7 187:10,21,23,23 incidents 86:13,14 include 168:12 180:16 184:24 included 2:5 14:9 25:3 53:10 56:17 64:18 103:1 114:24 175:18 183:13 185:23 includes 90:21 110:5 161:13 180:17 including 25:19 46:2 91:1 93:9 98:23 101:11 104:4,19 146:15 158:24 159:7 160:2 inclusion 70:7 inclusive 95:4 inconsistency 129:7 incorrect 9:4,6 52:9 105:16 117:11,12 132:20 133:17 134:20,23 135:2 153:8 indicate 105:5 indicated 180:9 183:6 185:22,25 186:4,9 indicates 56:22 68:16 92:24 indicating 141:17	indication 25:15 186:11 187:14 indicative 141:2 163:20 indictment 118:12 118:23,24 119:2,5 119:11 120:7,21 120:22 121:12 122:4 123:14 indictments 131:5 indirectly 62:18,23 individual 131:5 individually 81:8 161:21 individuals 90:21 93:4 97:1 98:13 98:17 100:19 101:14 102:4,20 104:4 174:9 industry 176:17 infancy 154:13 inference 165:20 influence 73:6 information 1:11 2:4,9,11 3:18,22 4:4 5:12 7:1 8:21 8:22 11:16 13:1 13:16 14:2 16:11 25:4 43:2 45:19 46:21 49:19 50:3 50:4,5,6,11 52:23 53:10 54:13,19 55:20 56:15,19 58:11,14,17,18 64:17,25 65:4,8 66:3,4,13 67:17 68:24 69:7,14 70:19 71:15 74:8 77:19 81:21 93:21 99:18 103:20 110:14 125:10 129:6 134:17 135:6,24 136:3 137:12,22,24 146:20 151:14
--	--	--	--	--

163:15 176:21 179:5 183:4,18 184:15 186:4,6,7 187:11,13,19 information/intel... 68:16 initial 113:5 initially 18:4 81:15 132:7 152:11 initials 11:2,3 input 82:23 Inquiries 140:21 Inquiry 70:2 90:1 188:16 inserted 103:15 insofar 13:13,22 69:15 inspector 3:15,15 8:7 56:11 60:10 66:8 73:18 76:13 76:19 80:4,12,15 160:7 181:15 institution 44:6 46:7,12 47:9 50:8 institutions 41:14 41:17 42:2,7,20 51:23 54:9 176:24 instruction 25:13 127:8 128:2,6 129:2 insufficient 57:3 152:14,19 153:4 155:4 157:6,15 intel 61:2 intelligence 1:23 2:23 4:19 13:2 14:6 15:1 21:7,14 21:19,24 24:5,12 24:15 25:9,16 26:3,4,20 28:7,16 29:5,16 32:3 35:22,23,25 36:1 36:3,21 39:15 44:13 45:15 49:18 54:11 55:20 56:15	56:17,18 57:1,11 57:14,15,18,21,24 58:9,12,18,22,24 58:25 59:7,10,18 59:24 60:15,16,18 60:21,22 61:10,12 62:4,17 66:16 67:2,12 68:6 70:20,22 72:16 78:21 79:7 81:5 81:21 82:2,7,10 85:8 86:7 87:10 87:11,20,24 88:1 88:5,6,7,10,13,14 88:19 89:3,9,14 89:17 90:2 91:4 92:24 93:15 96:14 99:12,14,17,19 100:6,9 104:3 108:4,7,8 109:5 111:12,13,14,15 111:16 115:18,22 135:4 138:9 139:18 146:21 147:11 148:1,8,11 149:10 163:15,16 169:8,20 179:14 180:1,8,21 183:6 183:15 184:9,15 185:15,17,22,24 186:4,8 187:16 intend 129:24 intended 172:23 intent 56:23 70:11 73:23 74:7 intention 68:17 172:19 intercept 171:20 172:2,3,4,8 173:4 interception 172:20 182:1,11 interest 16:4 138:2 138:5,7 interested 47:17 83:24	interesting 187:25 internal 36:7 interpret 85:17 97:11 99:2 132:1 interpretation 15:17 96:20 172:15,17 interpreted 15:12 15:15 intervened 37:11 intervention 4:20 185:7 interview 107:22 107:25 136:2,6,21 interviewed 111:1 126:15 136:7 introduced 3:14 investigate 47:19 91:22 investigation 36:6 73:20 112:22 113:21,21 133:20 135:17 145:21 148:10,12,23 152:16 153:6,13 154:9 investigations 86:25 investigative 87:23 148:16,25 invited 115:3,8 involve 180:9 183:7 involved 64:24 85:4 90:22 93:5,11 97:8 98:6,14,18 99:4 100:23 101:6 101:23 102:5,21 104:5 105:6,15 146:23 147:13 148:2 158:18,24 185:23 186:10 187:15 involvement 155:15 IPCC 28:5 53:4	irrelevant 112:10 112:11 irrespective 19:4 ISD 110:7 issue 4:23 36:7 150:24 issues 169:7 181:12 italics 23:11 134:15 item 31:10 34:19 37:16 39:1 50:16 90:13,19 92:4,9 93:2,13 94:9 95:15,23,25,25 96:4,14 103:6,8 103:10,24 104:3 106:3 122:13,20 146:21 items 57:20,24 58:8 96:2 97:12,13,14 97:16 102:18 151:16	justify 7:3 <hr/> K <hr/> k/1192 177:25 K/1236 157:19 K/1245 56:2 79:1 150:6 K/1246 37:22,24 Kay 177:14 178:6,8 179:2,3 keep 108:7,7 167:9 Kelly 87:16 109:23 kept 42:3 90:24 93:7 97:3 101:9 102:23 103:4 143:18 Kevin 155:16 key 59:7,21,21 146:15 keys 12:15 13:8 kind 4:20 12:24 13:2 58:21 66:3 69:12 73:10 75:12 81:2 83:15 85:24 86:15 101:2 112:23 113:5 127:8 142:15 154:8 162:22 166:21 186:11 187:25 knew 19:13 25:23 28:20 75:25 86:25 114:20 147:2,6 180:19 183:16 knocking 113:25 know 8:5,23 9:3,7 9:10 10:21,23 11:9 12:16,18 14:4 15:16 19:20 21:2 25:13,21 26:17 28:13 29:11 29:14 32:16,24 47:23 49:5 50:23 52:3 54:22,23,23 54:24 55:1 61:11
			<hr/> J <hr/> J18 7:10 10:7 55:19 jacket 144:2,7 January 3:20 14:25 19:14,15,17 20:19 20:20 28:5 62:12 86:18,19 105:19 141:14 144:1 151:8 153:17 154:11 178:4,5 job 66:12 168:11 jobs 144:15 Joe 177:4 jointly 21:3 81:6 judge 119:23 123:15 judge's 120:3 122:14,21 July 53:4 127:2,2 127:16 128:7,14 June 121:19,21 123:2 130:9 jury 123:15	

63:16 66:15,23 67:6,7,8,8 69:3,5 69:7 71:6,17 73:2 73:11 74:18 75:16 75:16 77:11,18,21 78:3 82:14,25,25 84:6 87:3 91:21 105:2 110:24 113:17,18,22 114:7,12 115:1 116:15 124:2,12 128:23 130:15 131:3 132:9,15,19 133:17,18 134:2 136:19 149:24 151:23 152:25 153:3,22 155:3 156:3 159:22 162:11 163:12 164:18 168:20 173:6,15 174:20 174:20 175:2,9,19 177:4 181:13 187:18,23 188:5 knowing 167:4 knowledge 12:17 known 3:4 10:18 61:20 93:10,12,22 98:24 101:14,16 103:20 143:12,12 146:22 147:21 knows 116:8	103:3 largely 112:10,11 late 104:8,13 law 142:19 Lawler 3:15 8:7 24:24 25:16 26:11 26:12,17 27:4 29:11 42:11 49:2 49:3,5 56:20 60:20 72:19 73:18 74:15 76:13 79:21 85:13 90:7 160:7 160:16 161:1,17 163:8 164:19 171:3 Lawler's 26:18 27:2 49:9,10 50:2 51:9,16 60:10 66:8 89:18 160:9 181:15,19,24 182:20 lawyer 156:22 lay 51:23 143:12 laying 142:5 lead 50:24 leader 42:16 43:5,8 47:7,12,14 leading 52:25 leads 139:8 learnt 33:1 leave 119:1 121:4 139:6,24 leaving 39:13 145:5 led 85:18,22 Lee 88:3 left 4:1 120:17 140:23,24 144:18 181:19 left-hand 57:10 legislation 185:16 legitimate 30:22 34:21 37:19 39:10 40:6 41:25 Leigh 171:14,19 172:7 173:3	leisure 145:5,14,15 145:18 Let's 23:8 37:21 109:13 131:22 153:11 186:22 lethal 70:14 letters 60:15 levels 108:9 110:10 liaise 176:13 186:13 liaised 138:9 151:3 154:20,22 177:10 186:16 lie 75:3 121:10 123:16 124:18 133:8 134:19,25 162:22 166:19 lifestyles 139:20 light 140:24 likelihood 134:4 Lima 8:3 limited 49:22 line 26:8 28:9 32:24 42:5 44:15 45:8 45:10,16 46:12 47:10 52:18 155:16 liner 39:1 lines 5:6 9:23 41:7 179:12,24 link 36:3 123:13 147:9 176:20,23 linked 7:24 listed 185:13 listen 11:14 listened 11:10 listening 66:25 lists 68:14 little 34:4 95:12 118:7 185:19 living 4:17 19:14 139:13,17 LO08 7:14 located 186:5 location 45:2,17	46:16 48:1 52:22 77:21 140:22,23 locations 140:24 143:13 locked 45:6 LOD 7:14,21 8:20 log 10:22 26:16,18 26:18 30:4 36:7 39:15,20 49:10 56:8 61:24,24 63:2,11,12 67:1 67:21 70:10 72:8 72:11 76:7,18 81:11 82:25 89:18 89:21 90:2,11 102:2 103:21 104:1 140:9 145:10 168:19 185:4 187:23 loggist 30:12 logical 88:24 logs 24:15 36:1,19 63:24 71:2,3 82:3 88:14 148:8 long 8:17 22:20 64:23 69:14 77:10 86:10 99:9 114:3 114:5 152:2 181:8 longer 14:19 87:1 87:19 164:16 look 2:10,16 4:25 7:10 9:15,15 11:5 22:2 25:15 28:1 29:11 33:13,14 37:21 40:20 44:8 44:17 49:8,13,15 50:15 52:15 53:2 55:17 56:5 59:3 59:13,16,25 60:9 60:14 62:7,8 64:5 64:6 67:20 71:20 72:3 76:4,11,16 76:21 78:24 81:9 81:18 83:19 84:24 89:15 94:23 96:13	101:22 107:22 110:24 113:5,6 115:11 117:22 119:11,13 120:7 120:25 122:10 123:6,24 126:23 132:8 136:18 137:9 138:20,21 140:6 141:9 142:22 145:5,10 150:5 151:1,5 152:4 156:9 157:17 158:7 160:7 163:3 167:22,23 168:4 168:11 169:10 170:23 171:7 172:12 176:4,5 177:24 178:23 180:15 181:5,7 182:19 183:21 looked 1:11 2:1 7:2 9:12 13:15 35:12 55:25 63:24 84:19 87:22 125:1 132:7 132:10 135:22 136:13 137:1,11 137:20,21,25 138:25 145:11 149:25 162:14 167:21 168:9 looking 8:16 10:5 13:12 15:21 17:1 23:8 36:22 60:3 61:8,11 65:6 89:14,19 96:13 101:24 102:12 106:13 121:25 125:17 131:22 162:16 163:2 166:13 looks 27:22,24 38:7 47:20 52:7 72:14 79:22 89:20 110:17 121:9
L				
L 126:23 127:18 lad 148:13 Lancs 32:10 land 178:21 Lapniewski 86:10 87:1,19 88:16 113:9 115:3 large 32:12 42:2 54:10 90:24 93:7 93:11 97:21,22 98:6 101:8 102:23				

126:10 127:15 128:1 136:10 loop 140:25 loose 123:25 loss 34:19 lost 127:17 179:18 lot 19:11 25:18 60:15 63:25 64:17 131:9 152:15 153:5,12 155:5 lots 54:9 86:25 95:1 low 182:1,9 Luncheon 96:10 lunchtime 160:23	3:16 6:2 21:7 26:10,10 40:21 46:18,18 48:4,24 50:20 51:1,2,4 53:7,10 63:5 68:8 78:24 79:5 80:10 85:16 94:2 104:10 104:13,16 105:16 106:8 145:10,24 146:11 149:21 150:1 156:19 158:13 160:20 171:2,25 175:2 179:11,13,25 180:8 185:13 186:19 187:5,9 188:9 mark 5:8 7:13 10:9 69:1 71:9 79:6 84:16 151:13 marked 27:10 90:2 marker 14:9,11,23 markers 14:8 15:3 68:14 118:1 marry 132:11 marrying 118:7 massively 149:6 MASTS 171:11 material 70:3 135:12 matrix 57:15 matter 111:9,11 matters 97:12 109:2 maximum 114:2 135:18 McLennan 147:23 mean 6:8 12:13 16:2,23 27:17 29:8 36:11 40:4 49:13 60:23 61:11 84:14 120:11 125:3 131:14 161:24 164:5 172:4,10	meaning 15:13 27:18 85:18 means 6:16 139:14 148:11,11 164:10 172:4 177:6 meant 6:17 16:22 74:1 medium 182:2,5,10 182:12 meeting 39:7 110:7 148:14 meetings 115:8 147:18 152:9 members 23:20 59:21,22 143:17 membership 139:15 men 106:20 122:25 mention 3:12 49:15 51:2 52:18 156:11 mentioned 9:1 25:12 60:24 65:18 69:8 74:11 77:3 103:10 113:4 134:3 162:24 173:23 mentions 52:2 104:1 131:18 merely 157:24 message 79:21 Messrs 18:22 19:6 25:10 26:5 met 10:20 28:24 161:25 162:9 164:6,15 175:9 metal 45:8 methods 139:4 middle 44:25 99:13 122:1,3 141:14 178:23 Mike 24:24 25:16 56:20 85:13 mind 7:19 63:17 100:4 154:8 162:19	mine 120:12 121:19 121:21 minimal 137:24 minimise 17:9,10 17:17 183:2 minute 58:21 116:5 117:7 minutes 146:5 misleading 21:21 100:10 missing 94:12,14 95:6 118:18 mistake 8:5 9:12,13 119:17 158:20 mistaken 152:21 154:14 mistakenly 13:25 misunderstanding 3:1 21:4 misworded 44:10 mobile 178:13,18 178:21 Model 57:15 62:4 moment 10:13 11:17 23:5 33:8 33:15,16 36:11 44:9 55:3 62:7 76:12 79:17 91:6 96:5 155:3 163:10 168:10 188:11 Monday 50:19 51:3 monitor 4:19 month 143:6 months 56:19 104:10,13 Moore 150:25 151:12,20 152:20 153:8 156:10,15 156:22 157:23 166:23 Moore's 152:6 MOPI 5:11 morning 1:8 10:20 16:22 26:11 28:22 32:22,25 33:7	38:11 54:10 81:21 82:13,18 83:9,16 84:7 110:7 167:21 168:9 186:19 mouth 43:6,7 46:24 47:3 move 29:15 70:9 76:2 moved 34:6,7 35:14 142:15 movement 23:20 93:11 97:21,22 98:6 142:22 143:11 movements 32:3 51:22 140:15 moves 57:6,8 moving 13:9 35:7 35:10 39:9 40:10 143:17 162:7,9 165:14,16 169:15 MT11 30:21 32:12 murders 86:14
<hr/> M <hr/> M/65 186:24 M1/65 186:24 main 171:9 majority 13:10 making 20:2 40:9 51:12 78:6 82:24 156:2 174:3 male 30:20 31:2 145:12 Malone 127:7,11 129:16,17 man 7:23 8:1 69:18 126:24 127:13 128:4,10,20 147:5 manage 87:23 94:17 178:11 managed 88:1 management 5:11 115:21 117:13 176:6 manager 155:16 178:17,19 187:8 managing 88:7 167:3 Manchester 7:25 91:2 manner 141:3,16 mapping 36:5,23 March 1:8 2:13,17				<hr/> N <hr/> N 129:10 189:1 N18 11:8 name 11:12 80:8 81:15 100:19 103:1 178:12 named 56:23 names 42:13 103:15 120:9,10 120:13 National 57:15 62:4 nature 55:10 66:18 84:17 185:14 near 41:13,16 42:7 42:20 44:5,15 46:7 48:1 54:8 139:20 nearly 156:5,6 necessarily 83:24 110:20 112:14

176:24 necessary 5:9 43:19 necessity 78:10 need 24:17 29:1 36:10 48:25 50:16 66:12 77:18,21 78:24 79:22 80:17 88:9,10 90:16 110:9,24 149:7 153:20,22 157:8 158:4 168:18 needed 19:12,22 36:2,21 66:4 67:16 84:17 111:17 116:3 147:19 159:12 180:24 neither 40:13 113:15 124:18 never 14:17 18:12 19:2 21:1 25:12 36:11 42:6,9 45:14 48:12,13,13 50:5 74:12 81:7 116:4,7,9 117:14 153:11 175:16 180:18 186:11 new 2:4 3:22 19:19 48:21 79:7 83:13 91:2 111:18 119:1 130:1,3 140:23 149:7 179:14 180:1,21 185:12 Nexus 65:16 114:14 nice 142:12 Nicky 151:12 153:20 154:1,14 156:22 157:23 166:23 Nicola 150:25 152:20 night 4:10 12:2 24:14 25:12 31:22 32:18 35:3 36:16 38:7 39:3,16	42:17 66:7,11,14 67:4 82:12 107:1 156:25 168:17 183:15 186:22 nights 186:20 nominal 5:12 nominated 86:11 non-policing 117:20 non-specific 187:13 noon 183:19 normal 72:21 125:4 normally 93:23 north-west 2:21 68:18 note 18:10 51:16 55:25 56:3 75:14 80:16 82:7 140:15 143:11 159:24 notebook 46:5 52:8 noted 76:12 notes 26:22 49:1 51:9 56:5,10 66:10 notice 142:13 noticed 115:24 notified 86:21 November 120:22 136:7 176:10 177:19 number 1:10 7:18 8:19 9:2,4,6 16:18 22:12 37:23 42:1 61:3,4 86:13 90:25 91:3,3,8 92:7,9,12,13,13 92:18,19,22,23 93:1 97:7 98:1 99:10,22 102:19 102:25 105:14 118:4 123:21 124:5,24,25 125:18 128:12 129:15 148:8 149:25 164:3,25	178:13,14,18 187:10 numbered 163:21 numbering 22:13 numbers 178:21 numerous 4:7 16:12,12 73:2 113:7,25 152:9 nuts 171:11 <hr/> O O 129:12 O2 30:2 31:21 O2/850 145:8 Objectives 140:14 observations 34:19 39:23 observed 32:12 33:19 53:13,21,25 139:11 observing 45:4 48:2 obtain 61:13,15 92:25 obtained 87:14 obtaining 179:5 obviously 8:1 9:9 10:24 11:9 13:1 34:18 74:24 103:21 105:18,22 108:6 109:8 119:16 131:6 132:8 148:9 154:15 164:9 166:12 171:15,17 171:20 175:9 occasion 38:16 46:3 51:21 52:3 87:6 90:9 145:4 151:2 166:4 occasions 13:11 16:12 106:24 107:6 145:1 occur 159:2 occurred 46:20	106:5,7 107:8 OCG 22:25 23:18 36:23 53:13,21,25 139:3,5,11,16,19 OCGs 23:20 October 104:16 119:13 120:3 124:10,17 130:8 130:13 odd 162:13 oddly 72:7 offence 5:9 11:22 23:23 93:23 124:9 126:25 128:5 130:1,17,17,22 133:1,5,6,13,14 134:18 159:2 172:20 186:1 187:17 offences 4:8 6:9,10 16:13 68:22 70:18 70:21 71:14 90:23 92:16 93:6,8 97:23,24 98:14,22 99:4 101:7,10,25 102:6,22 105:15 129:22 139:7,20 157:7 offender 4:12,14,15 6:4,8,16,18 16:21 129:4 offenders 5:13,14 5:14,20,20 7:4 16:23 126:15 131:17 133:11 offending 12:22 offering 136:3 office 67:7 178:24 officer 25:14 29:25 33:5 35:6 39:19 39:20 40:13 43:8 47:3 49:6 51:14 51:25 52:16 61:20 64:14 77:4 129:15 152:10 174:15,16	181:8 186:13 officers 1:12 5:8 8:23 9:3 12:16 13:25 15:19 16:2 17:3 21:19 42:13 46:2 54:24,25 78:11 105:2 113:13,15 114:10 114:25 116:25 117:8 129:23 154:16 173:2,10 174:22 175:3,6 182:9,10 184:22 offices 140:15 143:11 OIC 28:11,12 138:18 okay 1:16,20 3:12 3:23 5:4 9:20 11:19 17:25 22:17 24:3 27:25 29:15 32:23 33:17 38:17 45:1 47:14,15,19 49:18 50:8,12 60:8 61:7 63:18 69:20 73:15 75:21 79:24 80:22 81:1 81:9 84:8 89:6,22 92:18 96:19 98:3 102:16 109:14 116:24 125:16 128:25 131:23 132:12 134:10 140:6 141:8 150:23 151:5 155:2 159:21 160:6,25 161:19 162:2 164:24 165:22 169:25 170:24 171:10,13 179:23 181:10 188:10 old 125:7 OM 126:25 once 18:24 19:12
--	--	--	--	---

19:13 27:18 73:9 116:18 166:7,17 ones 42:14 90:16 181:4 ongoing 36:6 73:19 86:25 187:22 onwards 1:9 61:8 Op 79:7 85:4 129:21 open 1:14 167:9 179:7 181:14 opened 110:20 opens 178:10 Openshaw 1:8 77:5 83:8,18 operation 5:11 14:18 18:1,7,14 23:18 37:9 56:18 58:20 68:5 69:10 73:19 75:5,24 76:4 80:24 85:5,9 85:16 111:20 113:8 116:1 148:7 152:8 168:15 171:18 175:21 177:15 179:13,25 184:10 operational 20:1 68:12 116:2 148:17 154:25 155:13 185:4 operationally 113:16 operations 114:14 156:12 185:14 opinion 15:21 164:21 opportunities 139:6,24 opposing 8:1 opposite 83:12 ops 83:6,7,8 option 174:10,16 175:13 OPUS 6:19 14:11	61:25 118:1 125:9 131:18,20 132:3,8 132:9,10 135:23 137:22,23 oral 2:8 89:7 order 88:24 89:1 93:24 119:24 121:3 122:22 186:3 ordered 121:10 124:18 134:19,25 organisational 138:24 organised 36:4 86:24 orientate 79:3 orientating 44:24 original 37:16 90:2 110:1 149:9 originally 35:15 originated 68:24 originates 3:23 9:13 Oscar 10:1 outlier 15:16 outset 113:22 149:14 outside 107:20 outstanding 143:12 overall 58:20 129:23 133:4 178:19 182:14 overloaded 41:2 overnight 188:1 oversight 149:19 overstatement 16:16 overview 171:13 ownership 117:5 <hr/> P <hr/> P 130:5 P/56 156:18 pace 110:7 package 108:9	padlocked 45:7 page 1:17 4:2,25 7:10,11 9:21 10:5 13:15,18 14:3 22:9,12,13,15,15 23:3,7,7,9 30:3,10 31:7 35:18 39:5 44:25 50:17 53:6 55:17 56:10 59:8 59:16 60:14 61:14 62:14 64:7,9,12 68:2 70:9 76:11 76:21 81:18 84:25 85:1 89:16 90:19 92:23 93:13 94:16 94:21 95:21,25 96:1,15 108:2,5 108:22 109:23 110:13 117:22,23 119:7,14 120:5,13 120:16,17,23 121:22 126:2,14 126:25 127:18 129:1,10 130:5,12 131:13 132:12,22 134:13 141:11 143:21 151:6,11 156:13 157:20 158:9,12 160:8 171:7 172:12 173:20 178:23 179:19,20 181:7 182:20,21,22 184:1,11,12 pages 23:5 34:7 41:3 57:11 94:17 95:4,6 114:2,3,5 118:17 126:7 Parade 50:18 165:1 165:4 166:1 paragraph 34:10 64:12 85:3 93:20 103:24 171:9 172:18 179:10 184:7,12	paragraphs 32:6 55:17 parameters 82:21 park 45:2,3 174:17 174:24 parked 10:9 14:15 56:24 142:12,12 171:16 172:7 Parkinson 147:3,13 part 1:20 5:2 22:20 32:6 35:7,11 36:22 40:20 49:13 86:18 107:25 111:8 115:6 117:23 138:24 143:23 149:9 156:19 158:9 160:9 167:25 168:10 176:6 178:1 184:4 participants 126:10 particular 6:3,9 21:11 38:16 45:3 46:22 138:2 139:12 142:23 143:2 149:5 155:16 particularly 16:5 84:20 152:12 188:8 partners 112:21 parts 1:10 4:4 95:5 114:21,24 pass 152:14 153:4 155:4 passage 31:20 passed 12:24 27:18 27:19 29:17 42:18 42:21 43:1 52:23 89:10 90:3,12 153:23 passenger 31:3 passing 60:19 79:21 151:15	153:1 passport 92:25 patrols 93:25 Pause 23:4,6 38:2 137:8 183:24 paying 8:12 PC 14:9 113:10 115:15 137:15 Peace 13:2 pen 115:15 people 16:3 20:4 26:6 36:4 44:8 69:13 84:12,14,15 101:16 105:20 112:21 125:18 142:13 144:8 146:14 147:21 159:7,11,18 160:2 164:6 performance 142:11 performing 187:7 period 19:23 104:16 105:22 155:10 periods 19:12 permission 116:14 persistence 4:22 5:23 persistent 4:15 person 4:20,21 6:7 13:10 37:10 49:16 54:20 77:2 128:17 135:7 148:10 159:4 162:8,17 personally 5:10 6:6 12:23 personnel 184:24 persons 158:24 187:15 perspective 15:22 16:7 17:4 108:20 112:12 155:7 Peter 22:21 108:2 119:12,22 120:12
--	--	---	---	---

120:18 123:1 124:12 184:5 phase 85:4,14,14 85:23 86:1 phone 65:15,20 79:13 144:18 phones 144:23,24 photocopied 26:25 photocopy 26:18 phrased 43:15 phraseology 21:22 102:25 pick 10:1 19:5 35:5 176:18 177:1 picked 7:17,18 10:3 10:18 12:10 50:22 111:13 picture 17:2 74:18 74:22 106:14 115:15 185:22,24 186:9 piece 8:21,22 14:2 16:11 100:9 pieces 13:16 pile 88:21 pinged 141:23 pitch 73:8,9 78:7 place 32:12 35:5 47:16 48:3 51:7 147:16 157:6 171:19 172:21 186:2 187:12,19 placed 15:1 31:11 32:24 34:19 49:22 places 42:2 54:9 95:1 157:1 placing 33:11,19 34:2,13 43:3 44:5 plainly 11:11 plan 173:7 planning 23:20 93:8 97:5,23 98:22 99:5 100:24 101:10,15,25 102:13 105:11	139:5 146:23 147:6,13 148:2 plans 4:20 plates 54:8 56:24 61:15,16 105:20 player 7:25 please 1:14,15 4:2 4:25 22:2 23:9 28:4 29:15,24 30:9 37:22,23 40:20 44:17,17 53:2 55:14 56:5 59:3,13 60:9 62:8 64:6 70:9 71:20 71:20 72:3 76:5 76:11 81:9,18 86:7 90:20 92:14 92:18,22 94:9,24 95:13 98:11 107:23 115:11,11 117:22 118:12,23 119:13 120:8 122:11 123:24 125:22 126:18 127:23 129:4 131:13 132:12 134:8 138:20,21 138:22 140:6 141:9 142:22,23 142:23 143:8,19 145:6,8 150:5 151:6 152:4 153:15 156:9,18 158:7,8 160:8 167:9 170:21 172:12 173:20 179:7 181:5 182:19 186:24 pleasing 114:4 plot 174:7 pm 12:4 30:13 31:22 82:20 96:9 96:11 146:7,9 178:24 188:15 PNC 14:8 118:1	point 8:13 10:3,22 12:11 28:12 31:16 33:21,23,24 34:16 38:22 40:9 41:7 41:21 43:25 51:11 51:12,12 52:1,4 66:3 67:9 74:12 80:18 87:4,5 96:6 112:19 125:2 134:1 136:12 140:1,3 142:16 145:25 153:19 161:25 162:9,17 162:23 164:6 166:3,20,24 168:2 170:13 173:1 181:25 182:11 183:1 184:9 185:6 pointing 40:24 51:16 points 28:25 83:19 83:20 84:20 143:13 150:3,14 150:17 154:25 155:13,16,18,19 156:2 158:7 160:14 161:7,14 161:21 166:24,25 167:4,16 168:12 168:15,22 169:5 169:11 173:7 175:9 184:14 185:3,9,12,13,16 185:19 police 5:12 15:22 93:25 171:14,20 173:3 181:25 182:6,9,10 186:1 policing 116:22 139:4 policy 56:7,17 76:6 81:11 82:2 poor 31:12 179:1 posed 21:9,12 23:22	position 14:11 16:16 52:6 87:19 108:14 113:16,17 116:8 130:15 153:25 155:21 164:19 165:23 180:18 186:24 possessed 21:15 possession 25:19 29:20 93:24 140:21 143:4 149:10 159:12 175:15 possibility 26:23 180:11 possibly 2:15 10:17 57:23 58:1,2 91:19 115:25 116:17 118:18 139:17 141:4 Post 178:24 potentially 53:11 134:5 143:3 149:20 153:17 159:1 167:6,8 PowerPoint 9:14 26:21 160:9 167:25 168:2 practically 164:13 practice 112:8 116:10 125:4 142:5 pre-planned 85:4 prefer 119:1 preferred 118:25 premises 68:20 90:24,25 93:6 101:8 102:7,23 103:3 139:12 157:4 175:24 180:18,19 preparation 11:4 163:17 preparatory 157:5 157:24	prepared 3:19 22:20 49:19 53:3 112:7 113:14 116:1 117:7 146:14 148:20 179:10,11 preparing 105:11 108:1 114:20 present 24:18 46:17 47:12,14 49:6,17 51:15 84:6 159:4,11 171:5 presentation 26:21 160:9 presented 15:10 17:3 50:5 75:11 116:4 pressure 152:15 153:5,12 154:2,5 154:6,13 155:5 Preston 1:25 2:25 3:13 13:19 68:19 68:23 69:16 70:4 136:8 Prestwich 91:2 176:14 177:16 presumably 112:3 127:7 175:14 pretty 1:21 75:19 prevented 86:15 previous 2:5,10,11 2:12 3:19 24:14 36:5,18 39:16 42:17 48:20 54:11 60:10 62:12 73:22 73:25 75:7 81:4 106:24 118:6,25 143:19 144:15 163:16 166:13,14 168:16,22 183:16 184:23 previously 4:5 12:9 15:7,13 71:13 87:22 100:4
--	---	--	--	---

143:16 165:25 179:17 180:4 principal 68:13 148:2,20 print 90:2 137:23 printed 27:12 printout 133:21 prior 41:24 115:21 144:15,15 158:16 171:21 172:2,20 private 135:11 proactive 14:19 probability 20:1 probably 18:25 19:23 32:20 43:22 58:6 64:4 86:12 104:21 114:2 115:25 127:15 144:16 146:1 161:8 169:18 187:24 probe 15:5 65:22 65:25 66:13,18,20 67:12 probing 64:24 problem 94:23 118:16 126:12 proceeded 121:4 130:19 proceeding 146:2 proceedings 134:17 proceeds 139:17 process 1:15 63:18 63:22 65:7,14 70:13 processes 7:1 produce 129:24 produced 114:15 115:5 117:17 118:10 136:5,6,6 136:10 producing 135:7 professional 23:19 164:7,16 profile 14:10 87:5	87:13 109:5 110:1 110:8,14,22,23 111:3,15,20 112:9 112:15 113:24 115:4,14 116:5 117:5,16 123:19 124:25 134:16,20 135:4 146:25 147:5,17 148:15 profiles 107:15 108:4 111:25 112:6,11,13,20 113:7,12,25 114:14,20 116:25 146:14 147:24 148:9 project 176:13,15 176:16 prospectively 161:5 protect 186:3 provide 45:19 57:18 60:3,18 62:3 70:19 71:15 80:17 93:1 95:17 156:15 provided 28:15,19 46:21 49:17 55:19 60:15 65:1 69:17 70:22 72:16 80:5 82:10 84:1 89:4 94:2 95:23 96:1,2 106:3 111:20 113:3,12 151:14 183:4 providing 58:25 64:18 65:3 138:10 proximity 165:1 166:1 175:24 public 23:22 142:13 143:17 164:9 166:25 174:4 181:25 182:4,5 186:3 purely 93:19 114:1	114:15 142:18 154:25 176:16 purpose 35:21,25 36:2 44:7,7 51:17 77:15 88:19,20 113:19 116:11,22 117:20 purposes 20:1 36:8 108:1 115:19 117:7 184:5 pursue 159:24 Pursuit 70:15 put 3:13 6:1,18 11:3 24:9 31:20 35:25 39:20,25 42:4 44:18 52:19 61:18,19 62:6 65:8 69:6 71:20 74:19 76:2 95:6 114:9 122:4 126:21 131:15,17 131:19,21 132:4 133:7 134:15 136:17 140:6 144:7 145:8 154:11 156:9 170:21 175:3 176:5 177:25 179:7 183:22 186:1 putting 25:14 31:15 65:23 67:12 101:3	67:10 96:17 108:3 136:4,19 137:18 189:4 quick 33:13 quiet 173:25 quite 6:13 8:21 18:16 25:18 27:8 43:24 60:14 62:25 65:7 95:3 112:13 146:17 148:8 149:7 165:10 174:3	160:12 185:4 readable 88:23 reading 24:23 117:4 128:23 152:1 172:15,17 ready 176:18 177:6 realise 181:8 really 17:23 36:10 36:25 43:18 48:16 48:17 51:14 66:12 67:5 90:14 110:24 112:7 166:22 173:25,25 174:1 rear 31:11,15 reason 7:22 36:1,14 42:23 84:24 103:22 116:21,23 137:20 148:4 149:5 159:16 160:5 163:1,7,8 168:9 170:6 171:19 185:15 reasonable 139:16 reasoning 40:24 reasons 36:20,25 142:20 recall 60:6 67:16 74:15 147:1 149:4 152:12 172:15 186:15 recce 106:17 recces 50:18 106:25 reccying 56:25 receive 44:13 103:18 received 2:17 21:14 68:6 100:8 102:15 104:8 135:4 146:20 147:12 148:9 187:11 receiving 16:8 78:20 82:10 recollection 58:3 153:9 recommend 161:9	
			R		
			R 131:14 Rachel 133:7 135:13,21 radio 38:19 raise 11:8 raised 8:18 52:5 109:11 raising 52:1 ran 52:25 random 35:5 rang 187:22 range 142:20 146:14 rated 63:11 rating 61:2 91:4,18 92:1 99:12,15,19 99:24 100:1,2,7 ratings 99:17 rationale 15:3 40:23 78:3,4 159:15 re-offenders 127:23 re-sighted 140:25 reached 28:21 read 2:22 4:3 24:19 24:20 33:21,23 38:24 58:5 66:10 90:20 92:4,13 93:15 110:21 137:4,19 156:3		
			Q		
		question 48:7 61:22 61:25 65:21 70:12 91:6 106:2 117:12 134:4,5,7 135:16 135:25 136:13,16 137:1,7,16,17 188:7 questionnaire 135:14 questions 1:6 6:12 65:24 66:21,22,25			

reconnaissance 14:16 51:6 105:13 105:25 139:12 155:22	regard 25:20 26:3 48:12,14 83:3 152:21 154:14 163:9	51:18 53:12 55:20 111:25 117:22 157:8 158:4 159:13 177:1,2	reports 35:22 49:18 118:8 119:9,21 127:7 130:25 177:9	result 3:6,14 6:20 39:7 49:8 119:20 125:17 126:19 129:20 131:15,17 132:14,23 160:6 180:21 183:15
record 33:10,18,21 34:1,12 37:2,4 49:5,14 50:2,15 56:15 57:14 72:16 72:18 82:9 150:10 150:16,18,20 159:25 169:11	regarding 32:3 53:11 68:12 73:19 73:20 80:5 118:2 139:7 156:23	relied 51:9 rely 137:14 remain 121:3 132:14	represented 146:21 request 40:23 73:1 117:15 147:16 178:16	results 121:7 122:10 123:6 138:2,5,20
recorded 30:12 31:13 33:6 40:9 49:4 51:13,15 56:16 59:25 129:5 158:3 168:21 185:3	regardless 164:20 region 2:21 registration 7:13 7:18,21 8:19,24 9:2,6 54:8	remains 60:16 82:5 182:6,9,11,14 185:1,8	requested 64:13,17 73:16 requesting 117:16 require 183:12 required 23:21 79:10,15,19,20 110:8 112:15 113:22 184:8,14 185:12 186:1	retained 117:5 return 128:14 157:1 returning 166:16 reveal 140:21 review 26:9 138:24 reviewed 26:9 151:13
recording 11:11,14 40:23 42:23 48:23 136:11 171:2	related 13:13,22,23 15:23 28:16 29:5 70:3 89:9 93:18 95:19 152:11	remanded 130:9 remember 26:15 29:3 35:10,12,13 52:24 59:1,2 61:1 61:9 63:4 66:23 67:10 71:2,3 74:3 75:17,17 83:5,12 83:16,17,17,23 84:3,20 86:5,6 87:5 89:16 91:17 91:19 133:19 146:13 151:21 155:15 158:6 163:2 173:16	requirement 57:7 requirements 158:16 159:7,17 159:25 164:9 requisite 19:25 research 5:10 108:8 135:11,22 188:1,8	revising 184:9,15 Revised 56:17 revision 184:25 right 2:14 5:22 6:15 7:8 9:19 11:6 14:24 17:17 18:2,17,24 20:7 21:5 22:15 27:3 28:13,21 29:21 33:23 34:1,3 42:25 43:25 51:10 60:1 68:9 71:1 76:25 77:5,13,15 83:3 84:9,10 85:17 89:12 90:16 98:4,8 99:13 104:22 106:24 112:10 114:7 117:10 124:2,7 129:10 136:13 138:1,3 142:7 143:20 144:19 145:2 146:5 149:7 149:14 162:8 166:5 170:10 171:25 172:22 176:7 179:3,9,21 181:20 187:4
records 5:12 14:7 56:15 185:5	relates 94:6 141:5 relating 14:2,7,8 21:7,19 26:4 29:23 120:2 141:11 149:10	remembered 7:22 8:2 remove 170:12 removed 31:11 118:19 170:10 removes 30:25 31:1 repeat 66:12 125:6 repeated 100:3 repetition 102:17 repetitious 77:16 100:11	residential 174:4 resource 80:17 152:16 153:6,13 155:6,8 resources 79:22 153:18,19 154:6 respect 14:22 124:13 134:18 responding 179:13 179:25 responsibilities 14:20 171:11 responsibility 78:14,16 79:18 109:6 responsible 1:24 2:24 68:19 107:17 107:20 rest 4:2 9:17 29:13 restriction 108:9	revised 56:17 revision 184:25 right 2:14 5:22 6:15 7:8 9:19 11:6 14:24 17:17 18:2,17,24 20:7 21:5 22:15 27:3 28:13,21 29:21 33:23 34:1,3 42:25 43:25 51:10 60:1 68:9 71:1 76:25 77:5,13,15 83:3 84:9,10 85:17 89:12 90:16 98:4,8 99:13 104:22 106:24 112:10 114:7 117:10 124:2,7 129:10 136:13 138:1,3 142:7 143:20 144:19 145:2 146:5 149:7 149:14 162:8 166:5 170:10 171:25 172:22 176:7 179:3,9,21 181:20 187:4
redacted 61:5 80:8 90:14 99:8	relation 4:3 14:23 36:6,22 46:4,22 46:23 48:18 52:4 52:24 58:20 69:2 69:23 71:8,9 77:20 81:20 84:19 94:9 135:14 136:4 136:20 137:16 138:11 147:24 154:2,5,15 166:12 169:7 172:14 177:15	replies 127:11 replotted 140:22 reply 128:3,20 129:13 report 28:1,4 32:3 53:3 123:24 128:3 129:7 131:19 137:11 176:9 177:10 184:19	respective 179:13 179:25 responsibilities 14:20 171:11 responsibility 78:14,16 79:18 109:6 responsible 1:24 2:24 68:19 107:17 107:20 rest 4:2 9:17 29:13 restriction 108:9	referred 24:16 28:17 29:6,8 31:4 71:3 89:10 101:13
reduce 88:23 refer 90:17 163:23 reference 23:8 31:9 37:25 38:4 56:2 75:23 83:1 90:11 91:3,8 103:5 119:16 123:21 161:13	relative 13:7 relatively 96:17 relevance 111:16 113:1 relevant 21:8,11,16 21:20 25:10 27:14 29:13 32:6 46:17	referred 24:16 28:17 29:6,8 31:4 71:3 89:10 101:13	referred 24:16 28:17 29:6,8 31:4 71:3 89:10 101:13	referred 24:16 28:17 29:6,8 31:4 71:3 89:10 101:13

right-hand 125:24 181:24	106:16,21 107:6 109:6 111:4 119:5	Samana 111:20	154:21 156:21	110:13 115:14,17
rightly 43:24	119:5,6,12 120:2	satisfied 19:25 66:5 161:24 165:23	160:4 161:20	119:4 120:21
rights 117:6	120:8,20 121:10	Saturday 45:24,25 158:13	162:2 171:9	121:6,14 122:13
rigorous 65:7	122:25 134:18,22	save 118:13	173:21 176:12	123:18 126:7,14
Rimmer 18:22 19:1 19:7 21:9 24:16	142:17 144:13	saw 25:3 29:25 33:5 35:6 39:19	180:16 183:21	127:20 130:15
25:11 26:5 55:21	146:23 147:6,14	40:13 46:16	184:7,19 185:2,11	133:20 136:21
57:2 90:22 92:15	148:2 155:6 159:5	123:21 135:11	186:22 187:1,8	137:24 139:2
93:12 94:7 98:7	162:22 163:17	148:14	scale 93:11 97:21 97:22 98:6	140:11 141:11,16
103:1,5 104:5,20	166:19 180:9	sawn-off 134:19	scene 44:24	145:11 149:16
113:6 142:5 145:20	183:6 186:2,12	saying 5:3,21 6:7 8:11,13 10:1,25	scheme 99:3	151:8,23 153:11
Rimmer's 39:13	187:11,19 188:2	11:15 14:23 17:14	screen 83:20 84:19 167:24	158:12 160:6,11
ring 79:21 80:14	Robert 1:5 39:13 55:21 90:22 92:15	17:22,22 18:10	scrolled 110:20	161:20 166:22
ringing 142:14	103:1,5 104:5,20	26:2 28:19 32:1	seat 31:3,3	169:11 171:15,18
risk 17:8,13,14,21 21:8 64:13 85:5	113:6 145:20	46:10 48:11,11	second 3:2 9:18 14:2,16 24:4	173:25 175:6,14
110:5 148:17	189:3	51:11 74:15 91:12	34:10 38:22 41:7	180:15 182:2
149:8,9,13,17 183:13	Rogers 155:16	99:16 102:3,8,12	53:6 54:13 55:18	186:22 187:23
risks 23:21 149:6	rogue 37:25 119:16	113:18 114:7,25	72:1 85:3 93:20	188:8
RO0 7:24	role 11:22 12:22 112:16 187:7	116:12 120:12	97:4,22 98:2,21	seeing 29:3 33:15 124:23
RO08 7:21 8:2,20	roles 171:10	125:12 128:1,2,17	99:2,4,14 100:17	seek 79:8
road 48:3 52:25 91:2 174:5	roll 84:9	129:2 142:14	100:20,23 103:24	seeking 92:25
rob 61:23 73:19 74:25 75:10 119:6	Romeo 8:3 10:1	164:14 172:8	111:8 148:16	seen 8:14 14:6,14 14:25 18:23 26:8
121:13,16 122:8	ROO 8:2	179:11 188:2	155:1 163:14	28:22 34:12,17
122:13,21 125:19	room 83:6,7,8,25 114:14	says 1:22 5:5 7:11 10:7,11,14 11:7	170:1 171:9	35:4,4 37:15,16
130:8 133:12	Rooney 7:25	13:3 16:21 24:4	172:18 179:9	38:23 39:9,13,22
robberies 2:20,24 4:6 15:8 68:17	rota 80:11	27:11,16 33:16	183:1,23	39:25 40:6,10
100:22,23 101:15	roughly 19:14	44:25 53:23,23	section 4:7,8 5:7 16:13 87:20 88:4	41:12,16 42:7,19
101:16 103:2	routes 141:19	57:3,11 59:18	88:6 184:19	43:2 45:2,9,9,15
104:6 105:7,7,12	run 164:15 166:20	61:2 63:12 68:4	secure 45:4	45:16 46:7,11
robbery 1:24 13:18 53:11 68:19,23	running 56:19 111:12	68:11 73:15,17	security 92:16	47:8,13 49:21,22
69:16 70:3,18,21	<hr/> S <hr/>	81:24 90:20 99:22	see 2:1 5:16,21 6:25 7:11 10:7 24:7	50:6 51:22 52:20
73:19 75:10 90:23	S 110:15,23 131:14	100:16 101:25	16:13 87:20 88:4	54:19,20 62:15
92:15 93:5,8	safe 142:6 174:23	103:2 108:5,13,17	88:6 184:19	63:25 67:1 81:4
97:23,24 98:18,23	safest 174:10,16 175:13	110:4,13 115:17	secure 45:4	77:1 81:4
100:17 101:7,10	safety 164:9 167:1	117:2 120:17	section 4:7,8 5:7 16:13 87:20 88:4	86:3 109:8 111:21
101:25 102:1,6,22	Sainsbury's 45:5,6 46:14 53:1	121:19,21 126:23	88:6 184:19	132:8 145:1,4,24
103:17 105:15	Salford 4:17,18 86:14	127:20,22 128:12	secure 45:4	179:14 180:1
		129:19 130:5	security 92:16	send 27:20,21 36:16 88:14
		131:21 132:3,3	see 2:1 5:16,21 6:25 7:11 10:7 24:7	sending 116:25
		133:11 139:2	16:13 87:20 88:4	senior 25:14 117:13 154:16
		144:1 152:8 153:8	88:6 184:19	sense 112:7 114:6 146:18
			secure 45:4	sensitive 27:8,10
			security 92:16	
			see 2:1 5:16,21 6:25 7:11 10:7 24:7	
			30:4 37:9,10 44:8	
			44:20 46:5 47:17	
			55:25 56:7,10	
			57:2,10 59:10	
			60:14 62:6,13	
			67:1,4,25 76:12	
			78:23 81:20,24	
			93:20 96:22 98:13	
			98:15 99:8 101:13	
			101:17 102:25	

28:10 56:18 58:14 68:5 sensitively 117:19 sent 27:23 31:22 49:20 109:4 112:3 114:8 177:15 sentence 2:22 53:19 55:18 85:17 96:25 97:4,7,17,19,25 98:5,13,21 99:2,9 99:10,22 100:13 100:16,19 102:17 103:24 161:20 sentences 43:23 96:23 97:11,16 98:10 100:11 separate 48:20 97:11,13,14,16 100:6,8 109:13 115:6 122:6 separating 100:5 September 111:14 111:15 Sergeant 42:12 80:8 81:15 sergeants 42:15 80:13 series 94:17 serious 86:24 106:21 service 52:25 session 50:24 set 122:4,4 127:13 177:18 178:18,21 sets 160:14 setter 110:7 setting 70:10 78:10 settled 161:16 168:16 179:4 seven 8:17 9:23 sexual 5:14,19 6:9 SFC 64:20 73:1 85:11 161:8,12 Shaw 167:14 sheet 119:20 121:7	140:14 178:16 Shewan 62:9 63:19 Shire 18:19,21 56:18 69:10 73:19 79:7 85:4 shooting 86:14 shops 44:15 short 34:18 54:18 55:6 69:14 94:19 100:4 146:8 155:10 167:5,7 shorthand 50:10 shortly 43:3 77:14 171:12 shot 16:5 25:25 shotgun 68:21 69:16 134:19 show 120:13 129:4 showed 138:7,21 showing 50:1 51:8 shown 8:5 124:5 129:3,4,5 133:14 133:15,16 shows 8:11 119:22 124:9 125:20 185:21 side 72:7 83:18 125:24 175:4 181:24 sides 175:5,7 sight 159:12 sighted 143:12 sighting 29:20 53:12,20,24 54:5 54:6,14 162:20 165:14,16,19 sightings 147:18 sign 161:12 signal 14:12 signed 30:13 significance 143:15 144:6,21 145:17 significant 93:21 138:2,5,6 141:20 142:10 143:1	145:21 163:19 164:12 182:25 183:11 silver 28:15,19 76:25 77:8 78:18 78:19,20 79:6 85:6 94:2 114:22 158:21 silver's 62:16 similar 48:9,11 52:11 62:15 106:25 185:14 similarly 107:8 131:14 132:22 147:21 Simon 87:6 simpler 131:9 simply 159:17 single 121:16 148:10 162:17 SIO 28:11,11 56:11 57:1 66:13 82:2 152:10 163:18 164:4 176:9 185:6 SIO's 56:17 sir 2:7 3:1 5:21,25 6:6 7:9 8:25 9:11 9:21 12:18,23 15:15 17:6,10,12 17:22,24 20:22 21:4 22:21 23:1 29:14 32:2,21 34:5 36:13 37:4,8 40:19 44:4,7 47:11 49:9 50:22 54:16 55:3,9 56:2 60:6 63:7 71:19 74:3,8 76:10 94:21,25 96:4 108:2 120:9 121:19 124:8,11 124:14,16,21 126:3,24 128:4 135:14 137:16 146:6 149:16	150:9 156:17 159:15,19 164:1 169:19 175:16 179:18 180:13 184:5,11 188:11 188:14 sit 115:8 sits 27:1 103:21 sitting 26:19,20 84:3,21 situated 171:15 situation 134:6 162:21,25 166:18 166:21 six 8:17 24:15 29:12,16 43:23 58:8 71:3 106:12 sixth 96:2 skills 85:25 sledgehammer 14:15,25 slide 2:6 slides 2:8 slightly 19:16 100:12,13 146:4 slow 136:3 small 99:9 snapshot 113:4,5 societies 90:23 93:6 101:8 102:6,22 103:3 176:17 society 91:1 somebody 4:15 10:11,14 11:7 15:23 16:5 27:18 27:19 37:6 51:19 52:17,20 75:12 77:7 87:7 88:9,11 109:21 117:14 152:1 187:22 sophisticated 139:23 sophistication 139:5 sorry 2:19 3:1	20:11,22 21:4 22:10 23:1,2 24:1 24:9 28:3 35:18 37:23 45:24 47:1 50:9 58:23 61:14 62:1 63:7 67:22 74:23 77:16 78:19 83:8 85:13 87:3,4 91:5,7 94:14 97:25 102:19 103:5,7,9,11 119:15 120:9 121:19 122:2,16 127:17 128:22 138:4 155:2 156:11 163:12 176:22 179:18 184:11 187:3 sort 23:5 41:1 103:12 sounds 104:22 source 54:18,21 185:17 186:6 sources 56:22 SP2 31:11 speak 58:15 68:25 69:22 73:13 151:12 154:24 156:22 178:17 speaking 7:10 11:10 23:14 44:19 44:20 53:6 71:8 75:17 84:16 103:17 154:16 164:13 specific 21:19 28:16 29:6 85:5 89:9 118:1 129:22 137:17 179:14 180:1,21 183:5,12 187:16 specifically 66:23 67:16 158:6 168:4 speed 140:25 spent 19:9
--	---	--	---	--

<p>split 18:1 20:25 21:1 94:6 99:13 101:20 143:6 148:23 SPOC 86:11,16 87:2,9,19 88:2,17 spoke 25:1,8,22 79:12 91:23 151:21 153:16 spoken 24:14 54:24 62:13 86:5 108:25 111:1 151:12 154:18 157:13 173:16 spontaneously 185:10 spot 177:14 sprung 63:16 St 105:24,25 156:24 157:3 166:14 staff 68:20 staffing 108:9 110:10 stage 12:21 14:18 80:20 84:1 126:24 128:4 129:21 139:7,21 stamp 127:4 stand 38:13 standard 103:12 116:10 stands 174:9 start 21:6 22:14 23:14 29:24 44:1 148:18 158:8 started 56:2 111:13 starting 1:20 78:25 starts 79:4 130:14 State 175:10,10 statement 5:2 22:20 24:1 84:25 108:1 135:10 136:2,5,10 152:6 158:10 179:21</p>	<p>184:4 187:6 statements 9:5 22:5 station 171:15,20 173:3 stationed 173:3 stats 129:2,5,6 stay 38:14 stayed 119:1 stays 182:4 stemmed 75:20 Steve 79:8 80:8 stick 154:3 Stirling 185:5,20 Stoke 144:17,19 157:3 Stoke-on-Trent 14:17 105:19 stolen 7:12 10:8 12:14 20:15 32:9 34:15,16,20 37:17 37:18 39:10 41:22 41:24 54:7 56:23 57:3,6 61:13,15 68:22 105:19 142:6 143:12 154:11 158:25 160:3 162:3 169:12 stood 141:1 stop 172:4,23 173:13 stopped 48:1 52:21 88:17 stopping 68:7 store 147:16 straight 46:23 strand 154:8 strands 18:8 strategic 59:23 67:19 68:7 72:11 72:15 158:17 168:7,10 strategies 182:20 strategy 29:20 82:6 82:22 161:13</p>	<p>168:11 179:16 180:3 181:1,21 183:1,13 184:23 185:24 Street 171:16 strike 174:11,25 175:3 strikes 142:2 strong 183:11 struggling 163:7 Stuart 120:21 121:7,9 123:1,4 124:15,19,20 129:24 132:24 135:1 stuff 25:18 63:1 subject 14:10 30:14 30:25 31:4 45:9 45:16 46:6,11 68:5 87:13 97:12 107:15 108:4 111:25 112:6,9,11 123:19 124:25 146:13,25 147:5 147:17,24 163:23 171:16 172:19 176:12 184:25 subjects 1:24 2:24 5:11 7:12 10:8 13:23,24 23:23 28:16 29:6 44:14 45:1 47:25 50:18 56:23,24 57:5 61:13,15 68:13,17 68:18,21 70:11,17 70:20 71:11,13 89:9 106:9 107:12 139:8 141:6,12 142:4 157:7 158:4 158:25 159:3,8 160:3 162:3 163:16,19 164:1 164:11 165:1,24 169:12 171:20 173:5 174:24</p>	<p>175:7,23 180:19 182:5,11 185:7,25 186:4 submitted 36:2 subsequent 144:16 151:24 subsequently 9:5 29:17 87:13 91:21 94:4 131:3 158:8 160:11,12 substance 68:1 substantial 18:17 19:10 157:7 186:1 substantive 119:12 130:17,22 substitute 94:25 suburban 142:6 suddenly 35:5 sufficiency 150:25 sufficient 20:3 147:16 157:23 158:1 165:13 167:2 sufficiently 180:24 183:11 suggest 1:23 2:23 5:16 36:9 107:9 139:13 172:23 173:17 187:22 suggested 21:18 36:11 82:21,22 98:4 suggestion 15:9 25:15 75:7 suggests 73:22 74:1 75:8 summarising 113:11 summary 13:12 24:21 59:7 sums 90:24 93:7 101:8 102:23 103:3 Sunday 133:21 Superintendent</p>	<p>1:21 11:20 25:8 46:1 55:11 56:5 63:19 64:15,17,21 64:25 65:8 79:6 149:24 181:16 superiors 152:16 153:5 superstore 45:6 supervisor 127:5,9 128:2,12,16,17 supplemental 31:6 supported 135:12 sure 9:1 42:16 45:23 50:22 63:20 143:18 157:19 162:23 Surely 52:18 surprised 113:12 114:12,15,25 115:2 surveillance 12:9 18:17 19:2,5 20:2 29:25 30:4 31:13 32:16 33:5,9,10 34:17 35:6 37:9 38:13,13 39:18,20 40:13 42:13 43:8 46:23 47:4,5 49:4 49:6,16,16 51:14 51:19,21 54:25 77:4,7 105:5 106:4,7,13,15,18 106:19,23 107:8 107:11 138:1,3,5 138:6,21 139:24 140:2 141:3,17 145:10 147:8 148:12 153:19 155:9 166:7 172:5 172:7,9 173:23 survey 138:12,16 surveyed 44:14 suspect 6:23 71:8,9 112:19 suspected 13:8 18:4</p>
---	---	---	--	---

105:10 suspiciously 47:20 52:7 swapped 143:14 Sweeney 59:4 68:25 69:3 70:16 71:6,12,15 72:9 79:9 82:19 168:14 Sweeney's 62:14 67:21 70:10 Swinton 129:23 sympathise 135:20 system 6:19,25 15:1 36:3,22,23 176:7 179:4	tactical 27:15 59:23 76:6,18 80:24 81:2,5 82:20,23 83:22,25 84:2,15 85:8,12 111:21 158:19 170:22 175:17,20 tactics 77:19,22 81:3 168:15 173:9 173:22,23 174:14 take 14:13 42:25 55:4 101:1,5 114:10 115:9 118:12,13 131:16 133:4 134:8 137:6 164:20 173:24 174:6 181:7 187:12,19 taken 6:3 37:3 49:1 51:7,19 67:6 114:9,22,24 137:18 140:21 141:19 144:19 157:5 Talbot 14:21 15:2 31:22 33:7 36:16 38:15 39:6 49:19 112:5,18 151:23 152:11 157:10 158:3 159:10 166:23 Talbot's 156:19 talk 36:24 85:14 talked 152:22 talking 2:7,19 5:5 7:16 56:13 66:24 85:21 86:1 91:14 99:19,25 101:22 152:22 172:13 187:5 tangent 51:8 tap 154:6 target 8:24 57:1 91:1 148:3 162:22 183:7 185:23	186:9 targets 148:21 186:12 tasked 182:9 tasking 138:10 157:22 tasks 171:14 taught 174:21 team 8:1 15:18 16:2 34:17 38:13 42:16 43:5,8 47:7,12,14 47:15 59:22 90:21 90:25 93:4 97:1 98:17 102:4,20 104:4 107:17,20 116:2 140:22 141:1 173:9 175:10,19 185:4 186:16,20 teams 8:19 144:13 Technical 57:1 telecon 56:10 telephone 55:19,23 65:17 72:18 73:18 75:14 91:14,15 152:9 tell 10:24 11:15,25 13:5 26:2 37:6,8 58:14 63:14,15 73:25 74:6 92:4 118:24 128:10 142:9 157:10 telling 24:24 80:15 127:5 137:15 tend 17:8 tends 172:23 terminology 146:17 terms 2:6,6 4:21 6:21 9:8 12:14 16:25 36:25 40:5 42:16 43:17 46:19 47:12 49:4 51:12 52:16 58:4 64:24 67:5,14 74:12,23 77:18 84:18 85:25	86:1,22 107:15 112:14 115:4 125:16 145:21 151:5 156:2 157:11 164:7 166:24 169:6 Terry 79:9 Tescos 140:25 test 65:22,25 66:12 66:18,20 151:16 152:14 153:4 testing 65:7 text 127:24 TFC 23:21 42:24 56:16,20 57:1 61:22 70:12 73:9 78:17 81:6,24 82:2 158:20,22 163:18 164:4,14 164:14 168:19 175:18 184:8,14 185:4,6,21 TFCs 65:19 89:10 TFU 179:12 Thailand 19:19 92:21 thank 1:3,4 3:25 6:1 9:20 34:9 37:25 38:5 55:9 63:4 67:24 76:3 95:11 96:7,8 107:14 115:14 118:21 120:19 124:4 126:4,6 136:22 138:14 143:22 146:6 149:23 156:17 157:21 167:14 170:20 176:5 178:5 183:22 188:13 Thanks 129:6 thereabouts 86:13 thing 1:22 4:11 12:24 25:16 36:10	46:16 62:25 77:22 95:3 110:17 142:15 144:9 148:16 187:25 things 7:17,18 15:5 15:17 17:1 54:2 69:23 99:25 100:14 101:21 109:13 137:10 138:6 146:10 154:24 161:12 think 2:9 4:15 5:22 6:13 7:7 9:3,3,13 10:16 11:10 12:19 13:21 14:3,24 15:8,11,20,23 16:15,17,18,21 18:1,16,25 19:15 19:16,18 20:13 21:18 24:15 25:1 25:2 26:21 27:4 27:11 29:19 30:2 31:6,20 32:6,15 33:6,8,14 37:12 38:7,15 42:9 44:3 44:10,18,24 45:14 48:25,25 49:11,12 51:18 53:3 55:11 55:25 60:3 61:4,5 61:18 62:6,9,17 63:24 64:3 65:18 68:1 69:21 71:25 72:8 74:11,21,23 75:18 77:12 78:1 80:13 86:12,15 87:3,10,11 88:8 90:1 98:4 103:25 104:17 105:16 106:3,24 109:15 111:14 112:12,21 112:22 114:6 116:12,18 117:12 119:4,22 123:13 123:21 124:9 125:5 126:7,21
T				
T 132:12 T-shirt 145:13 TA 64:14 tab 1:17 22:7,10,11 28:2,4 44:18 49:11,11 53:2 55:14 56:6,7 59:3 59:5,13 60:9 62:8 64:7 67:21,22 76:5,16 81:9 84:24 85:1 89:16 94:24 95:5 96:15 107:23 134:11 158:9 160:8,8 170:23,25 179:8 181:7 TAC 59:13,22 62:15 76:3,25 77:8,16,16,17,25 78:2,6,13,14,20 79:10,12,15,18 80:2,4,9,15,20 81:11,16 83:13 175:17 tactic 144:7,11,11 171:25 172:3 173:13 175:2 186:2				

128:1 129:17	59:21,21 68:13	tipped 152:25	40:10 41:12,16,22	travelled 141:22
130:12 131:2,18	96:22 97:11,14,17	166:16	42:6,19 43:2 44:5	travelling 144:25
131:18,20,21,24	120:17 121:12	tipping 28:25 83:19	50:6 53:12,20,24	156:23 172:6
132:15 134:8	137:1 155:7	83:20 84:20 150:3	54:19 55:20 69:17	travels 156:25
136:21 137:1,25	163:23 175:5	150:13,17 152:22	73:20,22 74:5	treating 18:13
138:1,24 140:9,18	179:12,24 185:7	154:25 155:12,15	90:21 92:15,21,24	trial 118:9,25
141:18 142:4	185:13	155:18,19,21,24	93:4,7,10 94:7	134:23 143:24
143:6,20,23 144:8	threshold 151:16	156:2 158:7	97:5,8 98:2,5,7,17	trip 106:11 178:16
144:17 145:1,4,11	152:14 153:1,4,23	160:14 161:7,13	98:22 99:22	trips 105:19
146:3,16,20 147:2	155:4	161:21,25 162:9	100:20 101:6,13	try 8:13 94:24
147:9 148:7,25	Thursday 50:20	162:17 164:6	101:15 102:5,21	109:13 118:6
149:5,6 150:5,13	51:2,4 151:4	166:24,25 167:4	104:4,18,20 113:6	119:8,17 181:11
151:1,8,19 152:21	tie 53:11	167:16 168:12,15	121:14 122:7,11	trying 36:8 41:21
152:21 154:3,13	till 154:12	168:22 169:5,11	122:25 123:11	54:3 69:12 74:23
154:17 155:20	time 3:2 10:19	170:12 172:25	130:6 131:19,25	75:12,18 82:18
156:3 157:19	14:24 18:16,25	173:7 175:9 184:8	132:2,3 142:5	84:11,12 85:11
161:16 162:18	19:14,23 20:13	184:14 185:3,6,9	144:18 145:1,12	105:20 163:10
163:4,5,5,6,7,8	25:23 32:15,18,20	185:16	145:17 147:7	tucked 32:20 89:18
164:7,15 165:16	35:3 36:19 37:14	today 9:11 75:1	148:21 154:10	89:20
166:1 167:18,23	38:10 41:25 43:6	today's 38:20	156:25 157:1	turn 4:1,10 41:3
170:1,21 171:5	43:9 47:25 51:20	told 6:4 12:21 26:4	Totton's 30:22	55:10,14 56:1
172:12 173:11,21	57:11 64:3,3,23	29:11 33:6,18	33:12,20 143:23	67:19 78:23 86:7
174:23 175:21	69:5,5,6 74:24	37:6 39:3 42:6,9	146:22 147:12	94:9 123:18
176:4,6 177:25	75:1,4 76:25	44:8 58:1 86:23	touched 85:24	145:24 149:21
178:3 183:19	77:11 78:21 82:23	87:1 152:17 158:1	town 44:15	151:12 167:9,9
thinking 75:13	84:4 87:18 100:5	158:3 159:11	trace 144:23	170:21,22 173:20
third 15:7 45:9	105:10,22 108:10	166:23	tracing 144:24	Turning 138:1
61:12 92:11 95:23	109:10 113:24	tomorrow 79:23	track 29:23 95:12	twice 8:5
97:7,19 98:5	118:13 124:23	146:3 178:14,25	tracking 104:24	twin 93:10 98:24
124:7 163:14	127:2 132:6,7	188:13	trail 31:20 110:21	101:12
170:3 184:7,12	133:23 137:6,9	tonight's 32:4	trained 80:23	two 5:8 18:1,8,13
thought 2:17,19 6:7	146:1 147:10	top 22:13,15 23:11	174:20	20:4 32:6 36:20
6:16 11:2 20:14	150:24 155:10,12	27:10 30:20 61:14	training 174:21	47:22 51:16 58:21
46:6 139:23	155:17 168:14,21	95:23 110:13	tramlines 122:4	69:13 72:8,14
141:18,19 173:15	172:16 178:11,13	120:17 124:7	transcript 10:24	81:16 97:13,16,16
175:1	181:14 183:19	136:22 143:10	11:5	98:10 99:9,16,25
threat 5:7 7:7 17:2	187:14	156:13 158:12	transferred 37:17	100:1,12 101:21
21:12,16 23:22	times 19:9 37:12	total 104:21	125:9	104:10,13 105:19
70:14 82:5 167:3	85:24 89:8 104:17	Totton 18:5,13,22	transit 175:22	114:2 132:11
174:9 179:15	105:3 106:9	19:1,6,13 21:9	177:22 179:5,16	141:18 143:11
180:2,25 181:15	144:14 149:25	24:16 25:11 26:5	180:3,10,17 181:1	144:15 146:10
181:20,22,25	157:4 165:11,25	29:21 30:18 31:14	181:21 182:15	158:24 159:2,7,11
182:4,14,15	175:23 176:19	32:4,11,13,24	183:2,7,12 184:24	159:17 160:2
three 4:4 36:18	177:1,22	34:1,13 35:14	185:22 186:9	164:5 169:10,12
55:17 57:2,5	timescales 139:21	37:15 39:24 40:5	188:9	181:14,22 183:22

type 23:22 77:22 129:1 144:8,9 162:25 166:21 types 113:25	153:22 178:6 updated 10:21 111:3 130:25 131:1,2 133:10 157:11,13 updates 36:19 updating 107:18,20 109:1 upload 116:21 upped 149:13 use 65:13 70:14 73:23 74:7 77:23 81:3 89:23 94:24 116:6 117:8,16 144:11,12 149:10 166:6 useless 116:16 usual 77:24 utilise 87:7 utilised 175:2	165:15,17 174:1,5 187:15 verbally 151:14 verbatim 24:19,20 58:5 91:19 version 25:3 61:5 72:11 117:5 118:25 versions 72:14 vested 16:4 VI 5:8 video 32:16 33:1 39:24 40:2 view 22:24 23:17 139:17 viewed 32:22,23 viewing 33:1 40:2 violence 4:7 6:9 15:8 71:13 violent 5:14,20 visibility 144:2 visit 54:7 visited 92:21 157:3 157:4 visits 144:17 vitality 51:24 volume 1:14 22:5 23:8 28:1,3,4 30:2 44:18 49:11 55:14 56:6 59:3 62:7,7 64:6 67:20,22 81:9 89:15,24 96:15 107:22 143:21 volunteer 63:9 VTD 166:5 Vulture 75:6,24 129:21 VW 57:2	walked 30:21 walking 145:18 walks 30:25 want 48:22,22 49:10,13 50:15,24 73:8 77:23 94:24 118:6 134:6 138:20 141:23,24 142:9 144:24 153:9 162:20,24 166:18 171:12 181:11,22 wanted 73:13 138:12,16 152:17 168:4 War 13:2 warn 93:24 warning 14:7,8,11 14:12,23 68:14 warnings 4:5 14:3 Warrington 50:19 166:2 wasn't 2:4 8:2 19:10 21:8 29:4 36:8 41:20 48:19 58:21 65:13 78:6 78:13 94:2,5,11 101:17 106:19 108:20 111:2,16 130:23 131:1 137:9 180:12,13 watched 32:17 39:24 way 8:2 15:15 22:4 43:15 46:6 54:1 66:10,24 72:7 77:24 79:19 83:9 97:25 102:14,14 107:9 114:21 122:3 130:25 135:17 144:21 164:10,13 171:14 177:21 182:19 ways 65:19 weapon 14:5,6,23	weapons 4:5 14:3,7 14:8,9,13 70:14 70:18 74:13,14 157:8 158:4 159:12 weapons/face 151:17 wearing 30:17 31:2 31:10 145:13 Wednesday 1:1 51:3 weeding 15:2 week 19:23 113:9 113:10 129:24 133:22 153:18 177:16 weekend 63:20,21 80:19 weeks 8:17 went 6:13 19:19,21 35:15 36:15 38:15 51:25 63:19 87:16 105:23 124:25 137:10 140:23 145:19 166:10 168:6 175:10,10 weren't 58:11 101:14 136:16 181:2 whereabouts 23:1 whilst 23:5 84:16 118:1 white 30:20 31:2 145:12 wholly 15:16 19:10 21:21 36:24 wider 22:24 23:17 Wilf 30:15 Wilt 30:15,16,25 31:3,10 145:12 windows 175:4 wishing 142:19 witness 9:5 22:5,20 55:15 84:25 108:1 118:7 136:2 152:6
<hr/> U <hr/>	<hr/> V <hr/>			
ultimately 118:24 164:19 167:1 unable 185:17 unclear 185:1,8 underneath 127:22 127:25 understand 7:9 67:3 77:15 92:1,2 96:20 99:16 131:7 131:9 136:5 174:15 understanding 5:23 74:16 75:1 75:23 86:10 112:14,16 172:6 understood 33:11 80:1 115:4 147:9 172:10 undetected 129:3 unfair 78:9 uninformed 93:25 unit 49:17 51:19 84:15 87:11,12 88:5,10,13 111:4 155:7,9 Unit's 109:6 United 7:25 Units 20:8 unknown 91:1 unreasonable 15:17 untasked 182:9 unusual 162:15 163:3 185:14 update 36:17,18,20 36:21 38:7,20 39:6 46:19 69:24 108:8 109:7 127:6 127:7,23 128:2	valuables 180:17 value 139:14 variety 77:22 vehicle 7:13,23 8:16,24 9:6 10:9 11:9 13:8,9 14:14 30:23 31:4,4 34:20,21 35:16 37:17,18,19 39:1 39:9 40:6,11 41:22,24,25 43:3 45:11 48:2 52:17 52:21 54:7 57:6 104:24 126:19 140:22 144:10 154:12 159:1,4,11 165:19,20 171:16 180:19 vehicles 20:15,15 57:2 68:22 105:3 105:19 139:14 141:18,23 143:3 143:12,18 165:15	<hr/> W <hr/>		
		W 31:21 34:8 109:19 126:13 W/238 109:15,18 wait 162:22 166:19		

158:10 187:6 witnessed 18:12 witnesses 126:14 wonder 89:15 wondering 112:24 112:25 word 17:12 110:1 worded 41:18,20 54:14 156:4 157:12 164:10 wording 15:11 words 6:7 23:11 43:18 103:12,14 122:5,5 wore 106:25 work 29:16 54:25 110:8 112:24 114:7 119:9 133:20 worked 86:24 114:13 164:13 186:20 working 18:5 20:3 20:4 82:6,22 179:15 180:2,12 181:1,21 182:20 183:1,13 184:23 185:24 workloads 110:11 works 117:14 world 100:5 worn 107:1 worry 31:17 36:12 Worsley 32:11 34:3 43:4 wouldn't 6:6,10 7:17 15:22 16:4 17:4 25:21 43:12 58:6 61:21 63:12 63:15 84:4,4 91:13,20 128:23 133:15 141:23 142:12 144:9 154:24 168:8,18 186:20	write 54:1 126:11 writing 179:1 written 11:12 35:23 42:18 43:10,24 44:1 46:6 47:21 48:6,8 51:5 52:8 52:16,20 60:4 62:16 63:6,25 64:2 67:1 69:23 70:16 75:14 79:19 163:4,6 wrong 6:17 7:15,16 48:6,9,10 53:16 74:4 105:17 132:18,25 133:3 152:1 154:3 155:5 155:6 162:16 wrongly 54:14 wrote 28:5 37:21	York 140:15,17,22	1161 120:16 1163 119:14,15 120:15 123:9 1166 122:11,13 123:11 1167 118:14,18,23 1168 121:22,23 1168A 119:7 1169 118:14 1179 171:7 1180 172:12,18 1181 173:20 1195 151:6 12 56:16 129:25 133:21 154:9 12.30 51:1,5 76:13 76:22 160:21 12.59 96:9 1235 38:4 1236 39:5 1237 157:22 178:23 1240 40:20 41:4,5 1243 37:25 38:3 1244 79:4 1245 79:5 150:8 1272 182:21 1273 167:13 13 154:11 178:3 13th 19:18 14 1:17 44:18 117:22 120:22 136:7 15 1:1 19:1 59:3,5 67:21,23 16 8:23 46:1 56:6,7 89:16 94:24 95:5 96:15 160:8,8 181:7 16.59 11:7 1686 141:9 17 59:13 81:9 18 4:7 16:13 19 64:9 104:16 170:23,25 19.00 56:11	19.03 185:6,21 19.05 150:10 19.40 80:4 19.41 56:20 19.59 30:9 31:9 1995 75:6,25 119:13 120:3 124:10,17 130:8 130:13 1996 121:19,21 122:8 127:2,2 128:14 129:25 130:9 134:22 1997 134:22 1st 9:9 47:16 48:17 68:8 76:14,24 86:4 90:7
	X	Z	2	
	X 116:6 189:1 X7 5:2,16 6:16 44:19,20 45:19,20 46:2,10 47:17 48:9 52:11 171:3 172:13 173:21 X7's 5:2	Z 116:6 0 02331 128:12,16 04.13 108:5 04765 129:15 05.00 81:21 82:17	2 2 2:13 4:5 31:5 53:7 62:7 63:5 68:8 76:16 78:24 79:5 84:25 85:1 92:9 94:2 96:23 97:7,8 98:1 99:10 120:7 120:20,22 121:2 122:13 145:24 146:11 149:21 150:1 163:21 171:2,25 186:19 187:5,9 2.05 96:7,11 2/3 67:25 20 4:8 16:13 55:17 94:25 104:21 114:3 2005 69:15 70:4 2008 1:24 2:24 3:13 68:19,23 70:4 2011 104:8,13,16 176:10 2012 18:2 21:7 30:7 38:5 53:4 85:1 104:10,13,16 105:16	
	Y	1		
	Y 116:6 Y19 80:9 81:15 83:4,14 84:6 yeah 10:11,15,25 103:19 year 133:21 years 116:9 145:13 yesterday 1:19 2:1 6:13 7:2,16 13:15 13:21 15:9 16:17 28:12 41:13 49:25 65:18 90:1 112:20 113:4 118:10 125:6,19 131:21 137:2,25	1 2:17 3:16 4:5,12 4:14 5:13,16 6:4 6:16,18 16:21 28:3,4 40:21 44:18 46:18,18 48:24 49:11 50:20 51:1,2,4 55:14 62:7 64:6 67:20 67:22 76:5 81:9 84:24 85:1 89:15 89:24 92:7 96:15 96:23 97:4,5 99:22 107:22 119:11,22,23 121:2 122:13 134:8,11 145:10 156:19 158:9 160:20 170:23 176:5,10 189:3,4 10 53:2 121:19,21 123:2 127:2 128:7 128:14 130:9 146:5 10.30 1:2 188:13,16 10.48 31:22 36:16 100-page 136:1 11 28:2,4,5 11.46 55:5 11.55 55:4 11.59 55:8 1152 121:6 1157 123:6 1160 122:16,18 123:7		

2017 1:1	3	46:10 48:19 52:11	51 139:2	95 123:22 125:8
21 49:12 60:9 76:5 93:13 95:15 102:18 103:7,10 106:1 156:24	3 1:8 4:7 6:2 26:10 26:10 36:22 63:5 80:10 92:13 96:23 104:13,16 106:8 121:14,22,25 122:3,5 158:13 164:3 175:2 177:19 179:11,13 179:25 180:8 185:13 188:9	81:22 83:4 85:18 98:8 106:10,10,11 107:1 175:12	52 138:22 139:10 5x5 32:2 33:10 40:14 49:18 57:15 60:18 62:4 72:12 72:17 5x5s 58:11 5x5x5 59:18	
22 18:2,18 20:7,12 20:21,25 76:16 104:21 106:1	3.15 82:1	4	6	
2275 62:14	3.19 146:7	4 92:4,18 119:7 121:24,25 122:5 122:24 123:7 137:7 164:25	6 22:7,11 55:14 64:7 93:1 134:11 140:11 179:8	
22nd 18:7	3.30 146:9	4.00 178:24	7	
23 19:15 92:12,13 104:21	3/3 68:1	4.30 188:15	7 23:7 87:18 107:23 136:23	
24 23:7 55:17 62:8 64:9 144:1	30 85:1 111:14 145:13	41 93:2 94:9 96:4 96:14 103:24,24 146:21	7.00 12:4 55:12 149:25	
24-page 135:10 136:2	31 121:16 122:8	419 89:16	7.05 12:4 55:12 56:3 79:5 91:23 149:25 169:3	
2430 124:7	3168 53:6	440 90:19	7.59 30:13	
243085B 123:22	31st 177:18	441 31:21	74 104:17	
24th 142:24 143:1 177:17	324 59:8 68:2	442 34:6,8 95:4,7,9	75 22:15 56:16	
25 62:12 178:4,5	326 70:9	443 93:13 94:16 95:15	77 23:3,7	
25th 20:17 21:2 63:21 64:10 154:12 177:18	328 109:17	444 95:21	7th 133:24	
26 14:25 22:9,15 23:9 141:14 151:8 153:17 176:12	333 1:17 7:14 10:5 13:15,18	445 92:19 95:25		
267 152:4	334 11:15	446 92:23 94:21 96:1,15	8	
268 156:13	335 4:2 14:3	453 181:7,15	8 118:18 158:9	
26th 20:16,18 21:2 63:21	336 9:21	454 182:20	8.50 82:20 168:16	
27th 50:19 177:18	338 44:22	455 160:8,8,8	836 30:3	
29 29:21 30:5 38:5 41:16 53:13,21,21 53:25 184:1,11,12	341 44:19	475 95:4,7,9	842 30:10	
2925 76:21	346 108:2	483 59:16 81:18	846 31:7	
29th 31:24 42:19 46:7 48:3,18 50:20 51:21 133:24,25 166:4,8	347 9:19 11:5,7 108:22		850 145:10	
2nd 25:9 47:17 53:10 55:12 63:23 65:14 82:20 90:7 91:23	3593 71:24	5	87 4:25	
2nd/3rd 86:4	36 92:19 95:25	5 22:15 90:13,19 91:3 92:9,22 102:18,19,25 103:6,8 104:3 105:14 106:3 134:13	89 64:7	
	3601 72:3,5	5.00 82:18		
	369 49:14 60:14 76:11	5.20 26:10		
	370 49:14,15,15 50:17 61:14	5.30 10:21		
	377 136:21,22 137:4	5.40 10:21		
	378 137:6,6	5.57 1:9 45:22,23 84:7		
	385 56:10	50 67:22		
	3rd 28:22 45:25			