

<p>1 Thursday, 16 February 2017</p> <p>2 (10.30 am)</p> <p>3 THE CHAIRMAN: Yes, Mr Beer.</p> <p>4 MR BEER: Thank you, sir.</p> <p>5 MR ROBERT COUSEN (continued)</p> <p>6 Questions from MR BEER</p> <p>7 MR BEER: We finished yesterday dealing with the change in</p> <p>8 tipping point and the introduction of Mr Granby's</p> <p>9 briefing of specific reference to cash in transit</p> <p>10 deliveries.</p> <p>11 A. Yes.</p> <p>12 Q. Did you ask somebody to research what cash in transit</p> <p>13 deliveries there would be on 3 March 2012?</p> <p>14 A. Yes, I think I asked DS Hurst to make those</p> <p>15 arrangements.</p> <p>16 Q. So you asked DS Hurst to make the arrangements or to</p> <p>17 conduct the research?</p> <p>18 A. She may have conducted the research. I just needed to</p> <p>19 know what deliveries was going to be taking place.</p> <p>20 Q. That was important, because if there was a specific risk</p> <p>21 of a robbery of cash in transit vans, you would need to</p> <p>22 know, firstly, whether there were going to be any cash</p> <p>23 in transit deliveries?</p> <p>24 A. Yes.</p> <p>25 Q. And, secondly, the times for them?</p> <p style="text-align: center;">Page 1</p>	<p>1 companies would be travelling to.</p> <p>2 Q. Because, for example, Sainsbury's isn't a financial</p> <p>3 premises, is it?</p> <p>4 A. No, it is not.</p> <p>5 Q. Did you limit the request to her to delivery and</p> <p>6 collection times to only financial premises?</p> <p>7 A. I don't remember doing that. It may be that it's</p> <p>8 "financial premises" there because that was following on</p> <p>9 from 29 February, the overnight, where we obviously was</p> <p>10 looking then, potentially, at the hacksaw incident and</p> <p>11 we was looking at banks, so perhaps -- that may be why</p> <p>12 DS Hurst has requested that.</p> <p>13 Q. Do you remember whether you thought that the likely</p> <p>14 target was financial premises and, therefore, that is</p> <p>15 why the cash delivery and collection times would be</p> <p>16 limited to such premises?</p> <p>17 A. I don't remember. As I said, we never specifically knew</p> <p>18 where the location of any robbery was going to be, so</p> <p>19 I don't remember that, sir.</p> <p>20 Q. Okay.</p> <p>21 Did the inquiries that DS Hurst made determine the</p> <p>22 times of cash in transit deliveries to Culcheth on</p> <p>23 3 March 2012?</p> <p>24 A. Yes, I think there was just one, on the Saturday.</p> <p>25 Q. Just from your memory at the moment, then, what was the</p> <p style="text-align: center;">Page 3</p>
<p>1 A. Yes.</p> <p>2 Q. Can we go, please, to G1/2068, please.</p> <p>3 THE CHAIRMAN: G1/2 --</p> <p>4 MR BEER: 2068.</p> <p>5 THE CHAIRMAN: Thank you.</p> <p>6 MR BEER: Can you see, in the CLIO system, there is an entry</p> <p>7 at the top -- sorry, I will just wait for the chairman</p> <p>8 to get there. I am so sorry.</p> <p>9 THE CHAIRMAN: Sorry, I was just catching up with my note.</p> <p>10 I am there now. Thank you.</p> <p>11 MR BEER: At the top of the page, where DS Hurst has</p> <p>12 effectively allocated an action to herself, for 1 March,</p> <p>13 at 10.02:</p> <p>14 "Please liaise with FIB and obtain cash</p> <p>15 delivery/collection times for financial premises in</p> <p>16 St Helens and Culcheth areas as visited by operational</p> <p>17 subjects."</p> <p>18 That is obviously a little bit before, isn't it?</p> <p>19 A. This was done after the visit on 29 March and the</p> <p>20 evening of 29 -- sorry, 29 February.</p> <p>21 Q. It says:</p> <p>22 "Cash delivery/collection times for financial</p> <p>23 premises."</p> <p>24 Is that the parameters you put on the request?</p> <p>25 A. It would just be any locations where the cash delivery</p> <p style="text-align: center;">Page 2</p>	<p>1 delivery time on the Saturday?</p> <p>2 A. Probably lunchtime-ish. I think it was a Sainsbury's.</p> <p>3 Q. In general terms at the moment, again from your memory,</p> <p>4 I think you can confirm that the inquiries revealed</p> <p>5 there were no cash in transit deliveries certainly after</p> <p>6 5.00 pm on the 3rd?</p> <p>7 A. That's correct.</p> <p>8 Q. Can we look, please, at the evidence that underlies</p> <p>9 that. We can put G1 away, please. K/1237, please.</p> <p>10 I think this is part of your book; is that right?</p> <p>11 A. That's correct.</p> <p>12 Q. I think this is an entry for 1 March still, if you look</p> <p>13 at the previous page.</p> <p>14 A. Yes.</p> <p>15 Q. I think there is a note in the middle of the page:</p> <p>16 "There is a delivery at the Post Office at 4.00 pm</p> <p>17 tomorrow."</p> <p>18 So this would have been Thursday, the 1st, talking</p> <p>19 about a delivery at 4.00 pm on Friday, the 2nd, and then</p> <p>20 it says:</p> <p>21 "Awaiting further information from Anne-Marie Kay."</p> <p>22 A. Yes.</p> <p>23 Q. So that suggests the response, back at that stage, was</p> <p>24 that there was only a delivery to the Post Office at</p> <p>25 4.00 pm on the Friday; yes?</p> <p style="text-align: center;">Page 4</p>

<p>1 A. Yes.</p> <p>2 Q. Can we then look on, please, to 1239, which is further</p> <p>3 on in your note. Again, still I think for 1 March, and</p> <p>4 this is the other part of the response, so the update,</p> <p>5 effectively, from DS Hurst. Middle of the page:</p> <p>6 "Update from DS Hurst: all the cash deliveries at</p> <p>7 Culcheth, other than the Post Office, are by G4S and</p> <p>8 take place on Fridays between ..."</p> <p>9 Then, there are two times.</p> <p>10 A. Yes.</p> <p>11 Q. So this was saying that there would be a 4.00 pm</p> <p>12 delivery at the Post Office on the Friday, you can see</p> <p>13 the previous entry.</p> <p>14 A. Yes.</p> <p>15 Q. Then, all of the other deliveries are between those</p> <p>16 times on the Fridays.</p> <p>17 A. Yes.</p> <p>18 Q. The information that had come back from Operation Baltic</p> <p>19 was, "No deliveries on the Saturday"; is that right?</p> <p>20 A. Yes, well, from what is recorded there.</p> <p>21 Q. Yes. I think we can put that bundle away.</p> <p>22 A. Sir, can I just make it clear at this point, I think if</p> <p>23 you go back to 1237, at that point we were still looking</p> <p>24 towards -- this was responding to the hacksaw. So,</p> <p>25 I think, in one of the earlier entries, you can see that</p> <p style="text-align: center;">Page 5</p>	<p>1 A. It tells me.</p> <p>2 Q. -- that there isn't any on -- whether you are interested</p> <p>3 or not, you have the information --</p> <p>4 A. It tells me the Monday to Friday. Yes, it does.</p> <p>5 Q. Yes, and it tells you there aren't any on Saturday.</p> <p>6 A. Yes. I don't know if we had actually asked for the</p> <p>7 Saturday, is the point I was trying to make.</p> <p>8 Q. I see. Did you ever get any information that there were</p> <p>9 deliveries on a Saturday, then?</p> <p>10 A. It was in relation to a different company, I think it</p> <p>11 was Loomis.</p> <p>12 Q. Yes, and that was the one that was early in the day?</p> <p>13 A. It was -- yes, lunchtime I think it was.</p> <p>14 Q. Thank you.</p> <p>15 Did you discuss the times of deliveries on</p> <p>16 3 March 2012, when you spoke with</p> <p>17 Superintendent Granby --</p> <p>18 A. Yes.</p> <p>19 Q. -- on the evening of Friday, 2 March?</p> <p>20 A. Yes, I think I made him aware. If I didn't make him</p> <p>21 aware in the evening, I think it would have been the</p> <p>22 morning. But I think I made him aware in the evening</p> <p>23 about the delivery the following day.</p> <p>24 MR BEER: What; that there was one at lunchtime but not</p> <p>25 afterwards?</p> <p style="text-align: center;">Page 7</p>
<p>1 we had actually sent staff across to Culcheth to check</p> <p>2 that there was no damage at any of the premises, as can</p> <p>3 be seen --</p> <p>4 Q. Yes, and there wasn't any.</p> <p>5 A. So the NatWest and the Barclays Bank, and I think they</p> <p>6 had done some other places, as well, but that's correct.</p> <p>7 Q. Thank you. Can we look, please, at file W, page 275.</p> <p>8 A. Thank you.</p> <p>9 Q. I think, at the foot of the page, we can see an email</p> <p>10 from Anne-Marie Kay to Mr Talbot, Mr Clark and DS Hurst,</p> <p>11 saying:</p> <p>12 "Due to it being a small community there, G4S</p> <p>13 service the area every day but due to not being big</p> <p>14 branches they more or less service them all together, so</p> <p>15 G4S will be in the area between ..."</p> <p>16 Then the times and dates are given, but there are</p> <p>17 none on a Saturday; is that right?</p> <p>18 A. That's right.</p> <p>19 Q. I think, if we look at the top of the page, that at</p> <p>20 15.32, on the 1st, DS Hurst sent that email on to you.</p> <p>21 A. Yes.</p> <p>22 Q. So she has told you, "No deliveries on a Saturday", and</p> <p>23 there is some email confirmation.</p> <p>24 A. I was not interested in the Saturday, at that point.</p> <p>25 Q. I know, but this tells you --</p> <p style="text-align: center;">Page 6</p>	<p>1 A. Yes, but there was only one that we was aware of.</p> <p>2 THE CHAIRMAN: Sorry, what day was that?</p> <p>3 A. On the Saturday the 3rd.</p> <p>4 THE CHAIRMAN: I see.</p> <p>5 MR BEER: When did you have the conversation; you cannot</p> <p>6 remember whether it was the Friday or the Saturday?</p> <p>7 A. I think -- no, I can't remember if it was a Friday or</p> <p>8 the Saturday.</p> <p>9 THE CHAIRMAN: I have noted that you said, "The evening of</p> <p>10 the 2nd", but you are not sure about that?</p> <p>11 A. I am not 100 per cent certain, no.</p> <p>12 MR BEER: This would be significant information for him,</p> <p>13 wouldn't it?</p> <p>14 A. Yes.</p> <p>15 Q. For Mr Granby?</p> <p>16 A. Yes, it would be information that he would need to be</p> <p>17 aware of, particularly as we didn't know what type of</p> <p>18 robbery this was going to entail.</p> <p>19 Q. Can we look, please, at tab 16 of your file. We can put</p> <p>20 away W, thank you.</p> <p>21 A. Yes.</p> <p>22 Q. Look, please, at page 423.</p> <p>23 A. Yes.</p> <p>24 Q. This is part of Mr Granby's log; can you see the entry</p> <p>25 at 10.45 --</p> <p style="text-align: center;">Page 8</p>

1 **A. Yes.**
 2 Q. -- which says:
 3 "Review with ACC Sweeney. No new intelligence."
 4 This is, I should say, for Saturday the 3rd.
 5 **A. Yes.**
 6 Q. "No new intelligence."
 7 Then it says:
 8 "Discuss with SIO likely targets and risk periods.
 9 Cash in transit deliveries predominantly 11.00 till
 10 1.00. Banks/building societies/Post Office all close by
 11 12.30."
 12 **A. Yes.**
 13 Q. Is that what you told him then, do you think, at about
 14 10.45 on the Saturday? Does that help you remember?
 15 **A. No, not necessarily. I don't know if I had already told**
 16 **him on the Friday evening. I think that would have been**
 17 **around a discussion in terms of what premises were**
 18 **likely to be open during the course of the day and what**
 19 **other potential robbery locations, places, subjects**
 20 **could be open to the subjects.**
 21 Q. You see that he has written that he has discussed with
 22 you the likely targets, and then the things that he has
 23 written about are cash in transit deliveries, banks,
 24 building societies and the Post Office.
 25 **A. Yes, because they were all --**

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1 Q. Were they the likely targets?
 2 **A. They are all cash rich, aren't they, those types of**
 3 **places?**
 4 Q. Was it your assessment that they were the likely
 5 targets?
 6 **A. No, they were potential targets.**
 7 Q. I am asking: was it your assessment they were the likely
 8 ones, as he has written?
 9 **A. No, they were potential. There was also a bookmakers,**
 10 **I think there was a jewellers. There were other places,**
 11 **there was a travel agents. These places would all have**
 12 **substantial amounts of cash, potentially.**
 13 Q. So did you talk about all of those things and he has
 14 just written down that the likely targets --
 15 **A. Well, obviously, Mr Granby will answer this question but**
 16 **I think we are looking at timescales here, aren't we?**
 17 **So he is saying an assessment has been made. At that**
 18 **time, at 10.45, he is discussing a kind of a time --**
 19 **time parameters of the next, probably, couple of hours,**
 20 **and it is probably more to do with when he is next going**
 21 **to review the actual firearms.**
 22 Q. I am going to come on to the time parameters in
 23 a moment. I am just focusing, at the moment, on his use
 24 of the words, "Likely targets", then mentioning cash in
 25 transit deliveries, banks, building societies and Post

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1 Offices.
 2 **A. Those are his words, aren't they? I would have said**
 3 **"Potential", but those are his words.**
 4 Q. Have you any note of what you said to him?
 5 **A. No.**
 6 Q. Turning then to what he has written about the risk
 7 periods, did you say to him that the risk periods were
 8 the times of cash in transit deliveries and when the
 9 banks, building societies and Post Offices were open?
 10 **A. For those particular areas, that those would be the risk**
 11 **times. Clearly, when the banks were closed, the risk**
 12 **would be much lower in terms of the public, in terms of**
 13 **risk around CVIT delivery. Clearly, that would be the**
 14 **time the delivery or collection was taking place.**
 15 Q. There is no risk of a robbery of a cash in transit
 16 delivery van if it doesn't arrive?
 17 **A. If it doesn't arrive, no.**
 18 Q. So help us then, what was the substance of your
 19 conversation with him at this time?
 20 **A. Just the potential locations that were in the Culcheth**
 21 **area.**
 22 Q. One way of reading this is that the likely targets are
 23 the four things that are listed. The risk periods are
 24 up until 1.00, and outside those times, a robbery was
 25 unlikely; do you agree?

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1 **A. No, I don't agree with that, sir, at all. Like I said,**
 2 **these are Mr Granby's words, they're not my words. That**
 3 **is his assessment.**
 4 Q. But it was the result of a conversation with you and --
 5 **A. I know it is as a result of a conversation --**
 6 Q. I want to know, please, if you can, what you did say and
 7 why Mr Granby has written it up wrong, because this is
 8 not reflective of what you are telling the Chairman, is
 9 it?
 10 **A. Sir, I have just tried to explain to you that I can't**
 11 **remember exactly the conversation that we have had.**
 12 **Certainly, it has not been a case of just looking at**
 13 **those particular areas. There was always an open mind**
 14 **in terms of -- I have said it several times now: there**
 15 **was never specific intelligence in relation to specific**
 16 **locations.**
 17 **Sorry, do I need to explain that further?**
 18 THE CHAIRMAN: You may have said it several times, but it is
 19 not quite what you are being asked.
 20 **A. Sorry.**
 21 THE CHAIRMAN: That is my concern.
 22 **A. Okay. If you ask me the question again and I will see**
 23 **if I can answer it.**
 24 MR BEER: Yes, sure.
 25 You do not have a good recollection of what you said

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1 to Mr Granby at about 10.45 on the Saturday morning; is
 2 that right?
 3 **A. That's correct.**
 4 Q. And I don't think you are assisted by a note of what
 5 your conversation was?
 6 **A. No.**
 7 Q. We have a note of what Mr Granby perhaps -- well, took
 8 from the conversation, is one way of putting it.
 9 **A. Yes.**
 10 Q. The focus of his note appears to be likely targets,
 11 which seems to be a selection. There is a range of
 12 possible ones, we don't know which they are. It could
 13 be anything in Culcheth. He seems to be identifying
 14 likely targets. Did you discuss with him likely
 15 targets?
 16 **A. Within the Culcheth area? It was always potential**
 17 **locations. Don't forget, we had also had the**
 18 **intelligence which I think it specifically said about**
 19 **banks and financial institutions, which was 2 February,**
 20 **I think, that intelligence was dated.**
 21 Q. I think you in fact received it on the 25 January, but
 22 it came out on the log on the 2nd.
 23 **A. Right.**
 24 Q. Your conversation with Mr Granby, then, was just there
 25 were a range of potential targets in Culcheth and you

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1 didn't narrow it down.
 2 **A. No, I think it was reflected as well -- if we had looked**
 3 **at the firearms briefing, you can see on the firearms**
 4 **briefing, there were a number different locations that**
 5 **would have been on there.**
 6 Q. But this was after the firearms briefing, this is as the
 7 day is progressing. This is at 10.45 on the Saturday
 8 morning.
 9 **A. Yes, but nothing had changed in that meantime.**
 10 Q. That is why I am asking you about it.
 11 **A. Sorry.**
 12 Q. Why do we have a note at 10.45 on the Saturday morning
 13 that the likely targets seem to be, according to
 14 Mr Granby, cash in transit deliveries, banks, building
 15 societies and the Post Office?
 16 **A. It may be as a result of his review with ACC Sweeney.**
 17 **It may be that ACC Sweeney has asked him to discuss with**
 18 **me. I don't recall. I am trying to assist as much as**
 19 **possible. So it may be that that is where it has come**
 20 **from, Mr Sweeney has asked the question of Mr Granby to**
 21 **speak to me in that regard.**
 22 Q. The second thing is the risk periods. Again, these are
 23 all sensible questions, aren't they?
 24 **A. Yes, of course.**
 25 Q. It seems that the -- according to Mr Granby's note --

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1 risk periods that were identified, as a result of your
 2 discussion, were between 11.00 and 1.00 for cash in
 3 transit deliveries, or a delivery --
 4 **A. Yes.**
 5 Q. -- and before 12.30 for the financial institutions; is
 6 that right?
 7 **A. Yes. For those locations, yes, sir.**
 8 Q. Is it right, then, that on the Saturday morning, you had
 9 agreed with Mr Granby that after 1.00, the risk had
 10 dissipated significantly?
 11 **A. No. It wouldn't be fair to say that, sir. I think the**
 12 **review there, at 1.00 -- or Mr Granby has written there,**
 13 **"Agree to review again at 1.00", that is obviously with**
 14 **Mr Sweeney when he wants a review.**
 15 Q. Presumably, that is because that is the last time that
 16 is mentioned there, ie we are going to see whether
 17 anything has happened after the time of the last
 18 delivery?
 19 **A. But then it would be to review after that time: right,**
 20 **well, what is now open in the Culcheth area?**
 21 Q. Did that take place with you, later in the day? "Look,
 22 we thought there was a risk of cash in transit, that has
 23 come and gone, nothing happened; we thought that it
 24 might be a bank, that has closed without anything
 25 happening; we thought it might be a building society,

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1 that has closed without anything happening; we thought
 2 it might be the Post Office, that has opened and closed
 3 without anything happening; where does that leave us?"
 4 **A. We didn't ever think it was one or the other of those.**
 5 **It was always an open mind in terms of what type of**
 6 **location, what type of robbery it would be.**
 7 **So, yes, we had them in mind because during the**
 8 **course of the day -- they were closing at 1.00, so of**
 9 **course once they are closed, the risk diminishes in**
 10 **relation to those premises. Once the cash delivery, or**
 11 **collection, has taken place, the risk diminishes there.**
 12 **But then that doesn't diminish the risk with any of the**
 13 **other premises that would still be open in that area.**
 14 Q. Just to pick up on an answer you gave earlier, had you
 15 discussed this with Superintendent Granby -- delivery
 16 times, opening times -- before he made an application
 17 for the firearms deployment authority?
 18 **A. I can't remember, sir.**
 19 Q. It would be relevant information for a silver to have,
 20 wouldn't it?
 21 **A. Yes, I think it would be relevant.**
 22 Q. Because it might be relevant to the assessment of the
 23 risk of the robbery happening, and it might be relevant
 24 to the tactical plan that is to be submitted to the
 25 gold, to the ACC, wouldn't it?

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1 **A. Possibly, sir, yes. I don't remember having the**
2 **conversation but it may have been discussed.**
3 Q. By the Friday evening, you were in possession of all of
4 the information that DS Hurst had gathered and we had
5 seen?
6 **A. Yes.**
7 Q. In any event, we can be clear that, by lunchtime on the
8 Saturday, it was apparent there would be no more cash in
9 transit deliveries that day?
10 **A. That's correct.**
11 Q. The relevant financial institutions, that are listed
12 there, were closed that evening?
13 **A. That's correct.**
14 Q. Just to nail down exactly the last delivery time --
15 I don't think we have been to this reference before --
16 can we just look at G1/2025, please.
17 Can you see the action at the 166?
18 **A. Yes.**
19 Q. I think this is after the event.
20 THE CHAIRMAN: 166.
21 MR BEER: Yes, after the event, and I think we can see that
22 the Loomis delivery was before midday, on the 3rd; is
23 that right?
24 THE CHAIRMAN: Middle of the page, is that?
25 MR BEER: Yes.

1 Q. -- effectively, to bring the case to a charge because of
2 resourcing issues.
3 **A. Yes, I mean, I disagreed with it, but I have seen what**
4 **Ms Moore wrote, yes.**
5 Q. On the 3rd, was there any sense between you and
6 Mr Granby, or you and Ms Hurst, that the subjects were
7 going to be arrested that day, irrespective of what they
8 did?
9 **A. No. I had already requested surveillance for the**
10 **following week, so I think that was granted either on 1**
11 **or 2 March, and I had had a team allocated to me for**
12 **Monday to Friday of the following week. I think**
13 **afternoons in the early part of the week and then**
14 **earlies at the back end of the week, so I was planning**
15 **and preparing to carry on with this investigation. And**
16 **I wasn't planning on being in work at the weekend**
17 **either.**
18 Q. We have seen a note in your book, I think -- if we can
19 go to it, please, K/1248.
20 **A. Yes.**
21 Q. This is for the 3rd.
22 **A. Yes.**
23 Q. Just to orientate ourselves on the timing of this,
24 I don't think any of the entries are timed.
25 **A. Yes.**

1 **A. Yes.**
2 Q. But in any event, this information came after the event.
3 **A. Yes.**
4 Q. The information you were operating on at the time was
5 that the last delivery was by lunchtime, by 13.00 hours?
6 **A. Yes.**
7 Q. Thank you. We can put that away.
8 Would you agree that in the light of that
9 information, the closure of the premises and the absence
10 of cash in transit deliveries after lunchtime on the
11 Saturday, that the risk of a robbery occurring was very
12 substantially diminished?
13 **A. It was reduced in relation to -- well, it was gone**
14 **completely in relation to the banks and to the CVIT, but**
15 **what I would say is that there was still risk around**
16 **other premises within that area. There was a number of**
17 **supermarkets, there was a bookmakers, as I have said,**
18 **there was a travel agents. I am not sure what time the**
19 **travel agents closed or the bookmakers would have been**
20 **open late. The supermarkets definitely were open late,**
21 **so there was still a substantial risk to those premises.**
22 Q. We have seen what Ms Moore suggested was a conversation
23 earlier in the year as to you being put under pressure
24 by superiors --
25 **A. Yes.**

1 Q. Is that right?
2 **A. Yes.**
3 Q. But I think we can see "Location of Audi in
4 Sandringham Road" and "Audi is out of camera location,
5 but OP will be in a position" come before the TFU
6 briefing, so they must have been early in the morning,
7 before 5.57?
8 **A. Yes.**
9 Q. Then there is an update from DS Hurst on the download
10 from the VTD.
11 **A. Yes.**
12 Q. Some other information which I can't time, and:
13 "PC Hallinan and DC Donnelly will attend the scene."
14 And then "Scene", and then it says:
15 "Cells booked at Ashton."
16 Is that a police station?
17 **A. Yes, it is.**
18 Q. Sorry, over the page, to 1249:
19 "Totton, Grainger and one unknown male in stolen
20 Audi."
21 Then the whole of that entry goes right through to
22 where Mr Grainger was shot.
23 **A. Yes.**
24 Q. So that looks like it was about 6.30 to 7.00, that entry
25 there?

1 **A. Yes.**
 2 Q. Did you book cells at Ashton Police Station?
 3 **A. Yes, well, I didn't personally book them, but I believe**
 4 **DS Hurst did.**
 5 Q. Is that because you anticipated, on the afternoon of the
 6 3rd, that arrests were going to be made?
 7 **A. It was standard procedure to do that. There was**
 8 **a possibility. At the end of the day, I have asked for**
 9 **an arrest capability to go out with the surveillance**
 10 **team, so there is always that potential that that could**
 11 **happen.**
 12 **I think if you look further back in my book at the**
 13 **deployments around Stoke-on-Trent, I have also at that**
 14 **time made arrangements for prisoners to be coordinated,**
 15 **because whenever you deploy -- if you are just deploying**
 16 **a surveillance team, you are not doing it on the basis**
 17 **that you are going to be making an arrest. If you are**
 18 **then supporting that with mobile armed support to**
 19 **surveillance, then it is a good possibility that the**
 20 **arrest will take place, so it is some advanced planning,**
 21 **I suppose.**
 22 Q. I am going to look -- in fairness to you -- at some of
 23 the earlier stuff at Stoke-on-Trent as well, but, just
 24 as a general point, this was actually reserving some
 25 cells, on the 3rd?

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1 **A. Yes, that is just standard.**
 2 Q. As I read it -- and we will come to the detail in
 3 a moment -- previously, when dealing with Stoke, you had
 4 what is called an "arrest strategy" and a "forensic
 5 arrest strategy" drawn up?
 6 **A. Yes.**
 7 Q. I can't see any reference to reserving cells.
 8 **A. Because we was over in Stoke-on-Trent.**
 9 Q. But wouldn't you -- if it is standard practice -- want
 10 to reserve cells in Stoke-on-Trent if there is a MASTS
 11 team out?
 12 **A. I had a DS who was going to do that for me. I think it**
 13 **was DS Hughes who was from Staffordshire, I think he was**
 14 **called, who was going to deal with that side of it for**
 15 **me.**
 16 Q. Were cells reserved whenever the team deployed down to
 17 Stoke; cells actually reserved?
 18 **A. I don't know how it works in Staffordshire. I don't**
 19 **think they work the same as GMP, I think they have G4S**
 20 **as security locations. So I assume they would have been**
 21 **booked, but that was all being coordinated by**
 22 **Staffordshire. DS Hughes would potentially be able to**
 23 **answer that question.**
 24 Q. But you are saying to the Chairman that this note during
 25 the day of the 3rd, booking cells, shouldn't be read as

Page 22

1 meaning that arrests were going to be made come what
 2 may?
 3 **A. No, because if nothing had happened, the same thing**
 4 **would have happened when we went to Stoke, you just go**
 5 **back to normal surveillance.**
 6 **Like I said, I had the team already booked for the**
 7 **following week, so that is potentially what would have**
 8 **happened.**
 9 Q. We can put that away, thank you. Can we look, please,
 10 at W/285, please.
 11 **A. Yes.**
 12 Q. This is an email at 4.26, on the 3rd, from DS Hurst to
 13 you.
 14 **A. Yes.**
 15 Q. She says:
 16 "Boss ..."
 17 Then there is some other information:
 18 "... Rick will do scene management with Kev. Roy
 19 can do prisoner reception. Afternoon crime scene
 20 manager is Pam Mather, who is aware. Just need some
 21 prisoners now ..."
 22 Did you discuss with DS Hurst the likelihood of
 23 prisoners being needing to be processed that night?
 24 **A. Not needing to be processed, no, but making sure that we**
 25 **had facility to be able to deal with any forensic**

Page 23

1 **issues, any scene -- we had to do it because we are**
 2 **basically deploying an arrest capability.**
 3 Q. Did you read this as her suggesting that prisoners were
 4 going to be on their way and it was just a matter of
 5 timing?
 6 **A. I didn't read it that way, no.**
 7 Q. How did you read it?
 8 **A. I just read it that she has deployed -- she has got some**
 9 **staff deployed. We have got somebody sorted out to do**
 10 **scene management, somebody sorted out to do prisoner**
 11 **reception should we need it. We have got the crime**
 12 **scene manager, who is aware should we need a crime scene**
 13 **manager, and if people do get arrested, "Look, boss, we**
 14 **have got a plan here."**
 15 Q. Can we look at 142 in the same bundle, please.
 16 **A. Yes.**
 17 Q. This is looking at a previous deployment, I think at the
 18 time of Stoke-on-Trent if you see the date of the bottom
 19 email --
 20 **A. Yes.**
 21 Q. -- 31 January.
 22 **A. Yes.**
 23 Q. Was that from a senior crime scene investigator,
 24 Mr Sefton, and he created for you a forensic arrest
 25 strategy?

Page 24

<p>1 A. Yes.</p> <p>2 Q. Just explain to the Chairman, in general terms, what</p> <p>3 a forensic arrest strategy is.</p> <p>4 A. He is going to give various strategies in relation to</p> <p>5 forensic recoveries of whatever scenes may be</p> <p>6 encountered, whether that be on the people themselves,</p> <p>7 vehicles, outside scenes.</p> <p>8 Q. So it is a pre-plan in a staged process to ensure that</p> <p>9 you don't compromise the integrity of any forensic</p> <p>10 material at a scene?</p> <p>11 A. Yes, you put it a lot more eloquently than I could.</p> <p>12 Q. Is that right?</p> <p>13 A. That is right.</p> <p>14 Q. You work out beforehand what you are going to do; are we</p> <p>15 going to lift the cars and take them to a yard; are we</p> <p>16 going to leave the cars in situ and photograph them; are</p> <p>17 we going to ask people to put boiler suits on at the</p> <p>18 scene and strip them there; are we going to lift them</p> <p>19 and take them back to custody and strip them there?</p> <p>20 A. That's correct, sir.</p> <p>21 Q. You do it in a sequenced fashion that is predetermined</p> <p>22 so as to try not to contaminate or compromise material.</p> <p>23 A. Yes, sir.</p> <p>24 Q. He was sending you a forensic arrest strategy and then</p> <p>25 some kits including GSR, which I think is gunshot</p> <p style="text-align: center;">Page 25</p>	<p>1 A. It was Culcheth, it was --</p> <p>2 Q. -- the same ground as on the 3rd?</p> <p>3 A. -- the same area. What I would say, that was</p> <p>4 an overnight deployment, so you don't have the same</p> <p>5 issues in terms of staffing, getting cells. It is -- we</p> <p>6 are in a different scenario here. This is a Thursday</p> <p>7 night. But you are right, the cells weren't -- not that</p> <p>8 I am aware, they were not booked for the Thursday night.</p> <p>9 Q. Why?</p> <p>10 A. I don't know.</p> <p>11 Q. Now, on the Friday, 2 March -- and will you listen to</p> <p>12 these questions quite carefully?</p> <p>13 A. I will listen.</p> <p>14 Q. In particular these ones.</p> <p>15 A. Okay.</p> <p>16 Q. You received some intelligence from a person called C3;</p> <p>17 is that right?</p> <p>18 A. Yes.</p> <p>19 Q. Yes?</p> <p>20 A. I don't know what their code names are but, yes, I will</p> <p>21 accept that --</p> <p>22 Q. We are going to talk about this in more detail when we</p> <p>23 go into closed session. I've some open questions for</p> <p>24 you to answer.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 27</p>
<p>1 residue; is that right?</p> <p>2 A. Yes.</p> <p>3 Q. A hair sampling kit, a nail collection kit and</p> <p>4 a clothing seizure kit.</p> <p>5 A. Yes, sir.</p> <p>6 Q. So this an example, is it, of you tasking somebody,</p> <p>7 Mr Sefton -- we can see that on page 143, I think, your</p> <p>8 earlier email.</p> <p>9 A. Yes.</p> <p>10 Q. Asking effectively for an arrest strategy.</p> <p>11 A. Yes.</p> <p>12 Q. But what I cannot see, at the moment, is, on those</p> <p>13 previous deployments, any booking of cells.</p> <p>14 A. As I have said, that was -- I had a detective sergeant</p> <p>15 from Staffordshire. Staffordshire were assisting me</p> <p>16 with quite a number of staff. This was a different</p> <p>17 scenario. It was not utilising Cheshire staff to assist</p> <p>18 us, so it was slightly different.</p> <p>19 Q. For the firearms deployment, on the 1st into 2 March --</p> <p>20 A. Yes.</p> <p>21 Q. -- did you book cells for that?</p> <p>22 A. I don't remember booking cells for that.</p> <p>23 Q. That wouldn't suffer from the same difficulties as not</p> <p>24 knowing the precise arrangements of the Staffordshire</p> <p>25 situation, would it? That was on --</p> <p style="text-align: center;">Page 26</p>	<p>1 Q. The person that spoke to you on the Friday and then on</p> <p>2 the Saturday, it was the same person?</p> <p>3 A. It was the same person.</p> <p>4 Q. He is called C3?</p> <p>5 A. Yes.</p> <p>6 Q. I want, in closed session, to discuss what the</p> <p>7 intelligence passed to you was; what assessment had been</p> <p>8 placed on it and what you understood it to mean.</p> <p>9 A. Yes.</p> <p>10 Q. But the questions I want to ask you openly are as</p> <p>11 follows: firstly, that intelligence was passed to you</p> <p>12 orally, not in writing; is that right?</p> <p>13 A. That's right.</p> <p>14 Q. It wasn't by email or some other electronic form of</p> <p>15 dissemination?</p> <p>16 A. No, it was over the telephone.</p> <p>17 Q. That conversation was not recorded, I don't think, was</p> <p>18 it?</p> <p>19 A. No.</p> <p>20 Q. You made a note of the conversation on the Friday night?</p> <p>21 A. Yes.</p> <p>22 Q. In handwriting; yes?</p> <p>23 A. Yes.</p> <p>24 Q. I think you know that the person on the other end of the</p> <p>25 phone, C3, made a note, too, of the intelligence that he</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 had received and the fact that he had disseminated it. 2 If you cannot remember that now, I wouldn't blame 3 you. 4 A. I can't. I can't remember. 5 Q. You can't remember. 6 Similarly, into the Saturday, you received some 7 intelligence from the same person -- 8 A. Yes. 9 Q. -- by the same means -- 10 A. Yes. 11 Q. -- with the same record being created? 12 A. Yes. 13 Q. Thank you. 14 Turning to the Saturday, we have established, 15 I think, that you attended the briefing at 5.57, at 16 Openshaw. 17 A. Yes. 18 Q. Did you stay at Openshaw throughout the day? 19 A. Yes, after the briefing I went to the DSU, to their 20 operations room. 21 Q. Which is, what, in a different part of the complex? 22 A. It is the same building, it is just they are at opposite 23 ends of the corridor. 24 Q. In general terms then, tell us what your movements were 25 for the rest of the day, on the Saturday?</p> <p style="text-align: center;">Page 29</p>	<p>1 would come in the room, he would have a firearms radio, 2 so I would be able to overhear but not necessarily, kind 3 of -- 4 Q. So you didn't have access to the firearms channel? 5 A. No, I think they had their own encrypted channel. 6 Q. What other means of communication did you have? 7 A. Phone. The phones. 8 Q. There was a desk phone and a mobile; is that -- 9 A. Yes. 10 Q. Okay. How, therefore, did you communicate with 11 Mr Granby in the course of the day? 12 A. I would -- I possibly walked down the corridor to him 13 a couple of times. I might have been lazy a few times 14 and rang him. But, obviously, towards the latter end, 15 he came to the operations room. He was in and out of 16 the operations room at various times. 17 Q. Okay, and what dictated when he came in and when he came 18 out? I know it is obviously his choice, but -- 19 A. I don't know. I suppose if he had had contact with 20 Mr Sweeney, he might then come and want a one-to-one, 21 face-to-face meeting with me. I can't honestly 22 remember -- on the build up, I can't remember how much 23 time he actually spent in there. 24 Q. You said, "Obviously, at the latter time he came into 25 the DSU".</p> <p style="text-align: center;">Page 31</p>
<p>1 A. I was in the DSU operations room. Opposite the 2 operations room there is the DI's office, so I was in 3 the DI's office and I was -- 4 Q. That is the DI for the DSU? 5 A. Yes. So I was in there, pretty much most of the day. 6 Q. Did you leave the building, at all? 7 A. I may have nipped out for a sandwich or something. 8 I can't remember. 9 Q. Okay. Which radio channel, or channels, were you 10 listening to; not their frequency or designation but 11 which people? 12 A. The surveillance team. 13 Q. Was that with an earpiece or was it broadcast on 14 a speaker in the room? 15 A. No, I had the -- in the operations room -- I had my own 16 personal radio, which I would have an earpiece for but, 17 in the operations room, they have a radio which you can 18 switch on which -- 19 Q. Is on a speaker? 20 A. Yes. It just blurts everything out, yes. 21 Q. Could you hear the firearms team, when they were 22 deployed on that radio channel? 23 A. No, they have a separate channel. 24 Q. You couldn't hear them, at all? 25 A. No, not for the most part of the time. When Mr Granby</p> <p style="text-align: center;">Page 30</p>	<p>1 A. Yes. 2 Q. When did he come into the DSU? If you can't time it, 3 what event or events -- 4 A. I think it was probably around about 5.30/6.00ish. He 5 might have been in earlier than that but, certainly, by 6 that time I think he would have been in the room. 7 Q. What I want to do is compare your notes of the 8 progression of that day -- 9 A. Okay. 10 Q. -- with the surveillance log, if we can, please. 11 A. Yes. 12 Q. So that is a two bundle problem. The first is C, at 13 827. Do you have that? The second is K/1248. 14 A. Yes. 15 Q. So we have the surveillance logs for 3 March, and it is 16 at 828 the substance begins. 17 A. Yes. 18 Q. And your notes for 3 March. 19 A. Yes. 20 Q. Do you see the entry in the surveillance log for 05.40: 21 "A red Audi A6 estate with the registration 22 number ... is parked on Sandringham Road, Boothtown. It 23 is near to the junction with Leigh Road, facing away 24 from Leigh Road." 25 A. Yes.</p> <p style="text-align: center;">Page 32</p>

<p>1 Q. Your entry, in your book: 2 "Location of Audi on Sandringham Road ..." 3 That looks like it is the same event, doesn't it? 4 A. Yes. 5 Q. So, what, you would have heard that broadcast on the DSU 6 channel and written it down? 7 A. Yes, the likelihood is -- 8 Q. Is that right? 9 A. The likelihood is yes. 10 Wait, sorry. Yes, sorry. 11 Q. Yes? 12 A. Yes. 13 Q. Okay. 14 Then, I think there are no other entries on the DSU 15 log until 6.29? 16 A. Yes. 17 Q. There are no other entries on the rest of your page 18 about the movements of the subjects or the vehicle that 19 day. There is some retrospective stuff from downloads. 20 A. Yes. 21 Q. Is that reflective of the lack of movement of the 22 vehicle, the subjects that day? 23 A. Yes, well, the surveillance team were wrapped around the 24 vehicle that was considered the risk, so that is where 25 the surveillance team were plotted off.</p> <p style="text-align: center;">Page 33</p>	<p>1 surveillance unit log. That entry, there, had come from 2 the static observations that were being conducted. 3 Q. Who was that? 4 A. DC Clark. 5 Q. So the entry at the first two lines, on page 1249, is 6 from DC Clark? 7 A. Yes. 8 Q. Not the DSU? 9 A. Yes. 10 Q. Did you feed that back to Mr Granby? 11 A. He was with me at this point. 12 Q. So you were all in the room together? 13 A. Yes, there was myself, Mr Granby, Nick Hughes, who was 14 the DSU team leader. 15 Q. Inspector? 16 A. Yes, I think one of the TAC advisers was possibly in 17 there, as well. 18 THE CHAIRMAN: Could I just have those again. So, Mr Granby 19 was there, you were there, the TAC adviser, you think, 20 who else? 21 MR BEER: Mr Hughes -- is it DI or DS? 22 A. He was a DI at the time, DI Nick Hughes. 23 Q. How were you arranged, the group of you? 24 A. I can't remember exactly in the room. There was -- in 25 the operations room, there is a kind of a bank of</p> <p style="text-align: center;">Page 35</p>
<p>1 Q. I see. 2 At 6.29, in the log, it is recorded that the Audi is 3 travelling from Sandringham Road in Boothtown; yes? 4 A. Yes. 5 Q. Gloucester is driving, that is Mr Grainger, and Wilt is 6 the front seat passenger, that is Mr Totton? 7 A. Yes. 8 Q. "Audi will be referred to as Subject Vehicle 1, left 9 towards the A580." 10 Yes? 11 A. Yes. 12 Q. Can we see your notes, at page 1249. 13 A. Yes. 14 Q. Your note appears to be: 15 "Totton, Grainger, and one unknown male in stolen 16 Audi, all wearing gloves." 17 A. Yes. 18 Q. So that differs from what has been recorded in two 19 respects. Firstly, a third person is recorded. 20 A. Yes. 21 Q. And, secondly, it is recorded that all three of them are 22 wearing gloves -- 23 A. Yes. 24 Q. -- whereas the surveillance records don't support that. 25 A. No, they don't because that is from the dedicated</p> <p style="text-align: center;">Page 34</p>	<p>1 screens where you can pick up certain CCTV. There is 2 a screen where you can see where all the surveillance 3 assets are deployed when they are moving about, so they 4 are tracked. 5 So that is kind of on the back wall, and then 6 I think we are just on chairs within that room. I can't 7 remember exactly where we were, but it is not a big 8 room. 9 Q. Okay. 10 So you heard that all three men were wearing gloves? 11 A. Yes, I think I have recorded that there. I think that 12 is what has come over the air from DC Clark. 13 Q. Okay. The first tipping point was, I think, that two or 14 more of the subjects were in the vehicle? 15 A. Yes. 16 Q. So the tipping point was met? 17 A. Potentially, yes. 18 Q. Well, actually, it was met, wasn't it? 19 A. Yes. 20 Q. So you discussed with Mr Granby, "Our tipping point, or 21 one of them, has been met; what shall we do?" 22 A. Yes. 23 Q. You discussed that with him? 24 A. I am sure we did. I don't remember, specifically, the 25 conversation.</p> <p style="text-align: center;">Page 36</p>

1 Q. But you would, wouldn't you, having spent this time --
 2 **A. We would have done. You are quite right to say that,**
 3 **sir. Obviously, the vehicle set-off, moving, we have**
 4 **got three people in there. As you say, the tipping**
 5 **points are met. Potentially, I could have said, "Right,**
 6 **can we see where it is going? Let's just make sure it**
 7 **is not just going to go and do a loop of the local**
 8 **streets and park back up again".**
 9 **That -- I can't say exactly what the**
 10 **conversation ... but that is the type of thing that**
 11 **I would potentially request. I did mention, just there,**
 12 **obviously, the tipping points, there is always**
 13 **flexibility around those.**
 14 Q. You have drawn up a tipping point that had two or more
 15 people in the stolen Audi.
 16 **A. Yes.**
 17 Q. And that tipping point was met?
 18 **A. It was met.**
 19 Q. What would cause you to not say, "The tipping point has
 20 been met, please move to an arrest phase"?
 21 **A. As I have just said, if I just want to see if the**
 22 **vehicle is just going to be moved from one location to**
 23 **another location. If it is just going to be moved from**
 24 **one street to another. The fact that we have got**
 25 **three --**

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1 Q. But why? The tipping point is just two people in a car.
 2 It doesn't matter where they are going. It doesn't
 3 matter if they are going to the sweet shop round the
 4 corner. Two people in the car is a tipping point.
 5 **A. I just explained that to you, sir. That is where the**
 6 **flexibility is, that is where the professional**
 7 **conversations go on between myself and Mr Granby.**
 8 **I can't remember the exact conversation that has taken**
 9 **place.**
 10 Q. I don't understand. Why had a tipping point been drawn
 11 up that two people in a stolen car was sufficient to tip
 12 you to intervene if in fact you needed some more, that
 13 two people in a car was not ever going to be, of itself,
 14 sufficient to intervene?
 15 **A. Well, as I have said, I can't remember exactly what the**
 16 **conversation was but trying to think back as to -- I am**
 17 **just trying to give you an example of a reason it may**
 18 **be. If it is a case of: right, well, they are starting**
 19 **heading towards a different location, then are we then**
 20 **going to assess if it is -- the tipping point -- you are**
 21 **right, the tipping point is still met. But, as I have**
 22 **explained, there is always flexibility around those**
 23 **tipping points.**
 24 Q. But that would be a different tipping point, wouldn't
 25 it, than the tipping point you have just described? It

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1 would be: two or more people are in the car and they are
 2 moving towards Culcheth Parade.
 3 **A. Yes.**
 4 Q. Culcheth.
 5 **A. Yes.**
 6 Q. That is not what happened.
 7 **A. No, and I did explain yesterday that the moving towards**
 8 **Culcheth had specifically been taken out of there.**
 9 Q. What I am trying to work out is why, and then if that
 10 had been taken out --
 11 **A. Yes.**
 12 Q. -- why, when these two people, two subjects, were in
 13 the car, the tipping point, on its face, had been met,
 14 irrespective of whether they were just going to do
 15 a loop.
 16 **A. That is what I am saying about the flexibility.**
 17 **You have mentioned earlier, in terms of evidential**
 18 **thresholds. Clearly, I want to have as much evidence as**
 19 **I possibly can have to present to the Crown Prosecution**
 20 **Service; okay?**
 21 **Now, I mentioned yesterday that the CPS, at that**
 22 **point, didn't deem that we had sufficient information.**
 23 **It wasn't more than merely preparatory. So the first**
 24 **thing is, if we go to do an arrest phase on that**
 25 **vehicle, as it moves 50 down the roads, have I moved any**

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1 **further? Have I got any more to pass to the CPS?**
 2 Q. No, you hadn't, had you? You were no further forward
 3 than you had been two nights previously or on a lot of
 4 other occasions in the past?
 5 **A. Well, other than the fact of whatever may be in the car,**
 6 **clothing, that type of thing that had been mentioned to**
 7 **DS Talbot and to myself, previously.**
 8 Q. But none of that had been seen, had it, on this
 9 occasion? At this time?
 10 **A. In terms of?**
 11 Q. Balaclavas, or weapons or that kind of thing. The kind
 12 of things that had been mentioned to DC Talbot?
 13 **A. Balaclavas, clothing, gloves, et cetera, et cetera,**
 14 **means of communication, I think was one of the ones.**
 15 Q. Are you effectively answering my question why --
 16 a tipping point having been met -- was an arrest not
 17 made at this point by saying that because we wanted to
 18 let the operation run, to see what additional evidence
 19 there might be, to be able to present a better case to
 20 the CPS?
 21 **A. It would have been a consideration. It wasn't kind of**
 22 **a be all and end all. At that point, it is "Can we see**
 23 **what they are doing? Can we just see what they are**
 24 **doing?" At that point, I am not having a discussion**
 25 **with Mr Granby about evidence, I am just saying, "Can we**

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<p>1 see what they are doing?"</p> <p>2 Q. Can I put it another way then: the tipping point having</p> <p>3 been met, why was an arrest not made?</p> <p>4 A. Because, obviously, I have had a conversation with</p> <p>5 Mr Granby and the decision had been taken to see where</p> <p>6 the vehicle is going to travel to.</p> <p>7 Q. Your next entry is:</p> <p>8 "General direction towards Culcheth."</p> <p>9 A. Yes.</p> <p>10 Q. So, we are on tipping point plus now, aren't we?</p> <p>11 A. Once it is moving towards Culcheth. We had taken that</p> <p>12 tipping point out.</p> <p>13 Q. Yes, but that is why I am now saying it is tipping point</p> <p>14 plus. You are beyond the tipping point, and now you</p> <p>15 have the vehicle moving, not doing a loop to see whether</p> <p>16 there is any surveillance on it, not going to, you know,</p> <p>17 the sweet shop round the corner.</p> <p>18 A. No, but I think at this point Mr Granby then starts to</p> <p>19 mobilise the -- there is not a massive distance</p> <p>20 between -- as I know that you are aware -- between where</p> <p>21 the vehicle is located and Culcheth. I think, at that</p> <p>22 point, the conversations were being had in relation to</p> <p>23 mobilising those teams.</p> <p>24 Q. When the vehicle was seen moving in the general</p> <p>25 direction towards Culcheth --</p> <p style="text-align: center;">Page 41</p>	<p>1 Q. My question was: when the vehicle was moving towards, or</p> <p>2 seen to be moving towards Culcheth --</p> <p>3 A. Yes.</p> <p>4 Q. -- why was it not decided at that point that an arrest</p> <p>5 should be made?</p> <p>6 A. It wasn't. It was ongoing.</p> <p>7 Q. I know. Why wasn't it?</p> <p>8 A. I don't know.</p> <p>9 Q. Was it the subject of discussion between you and</p> <p>10 Mr Granby?</p> <p>11 A. It would -- undoubtedly. It must have been. You know,</p> <p>12 the reason why we are deploying a team that night is</p> <p>13 potentially -- potentially arrests are going to be made.</p> <p>14 So clearly it would have been a discussion. I can't</p> <p>15 remember exactly what was said.</p> <p>16 Q. Do you think it might be, "Okay, right, they are not</p> <p>17 just doing a loop now, they are now she heading towards</p> <p>18 Culcheth. Shall we let it run and see what happens?"</p> <p>19 A. As I just said, they may have gone into Culcheth, not</p> <p>20 stopped at all and come straight back, and then I would</p> <p>21 have had a decision to make.</p> <p>22 Q. I am asking you what the discussion was between you and</p> <p>23 Mr Granby. Do you think it was a joint decision, "Lets</p> <p>24 let it run and see what they do when they get to</p> <p>25 Culcheth"?</p> <p style="text-align: center;">Page 43</p>
<p>1 A. Yes?</p> <p>2 Q. Did you and Mr Granby decide that a tipping point had</p> <p>3 been surpassed and therefore an arrest should be made?</p> <p>4 A. Not at that particular point.</p> <p>5 Q. Why not?</p> <p>6 A. I don't -- I can't remember. I don't know. It</p> <p>7 wasn't -- I don't think it was at that -- well, it</p> <p>8 wasn't at that point that we went to --</p> <p>9 Q. It was later, and I am asking: why not at this point?</p> <p>10 A. Again, the vehicle is moving at this point, isn't it?</p> <p>11 Q. Yes.</p> <p>12 A. And it is going in the general direction towards</p> <p>13 Culcheth.</p> <p>14 Q. Explain why the fact that the vehicle was moving was not</p> <p>15 discussed.</p> <p>16 A. The fact that the vehicle is moving?</p> <p>17 Yes, if the vehicle -- on that evening, if the</p> <p>18 vehicle would have travelled to Culcheth, not stopped at</p> <p>19 all and travelled all the way back and parked up, people</p> <p>20 get out and walk away, then I would have had a decision</p> <p>21 to make, in terms of: am I arresting these people now?</p> <p>22 Is that going to be sufficient to arrest these people</p> <p>23 now and present this case to the Crown Prosecution</p> <p>24 Service? See what is in the vehicle, see what items of</p> <p>25 clothing they are wearing.</p> <p style="text-align: center;">Page 42</p>	<p>1 A. No, because -- well, I can't say, can I? I am</p> <p>2 speculating in terms of what the discussion was.</p> <p>3 Q. We had seen Mr Lawler's operation the night before, and</p> <p>4 he said that the operational plan was to prevent them</p> <p>5 getting to Culcheth.</p> <p>6 A. The night previous, yes.</p> <p>7 Q. Why wasn't that the operational plan on this occasion?</p> <p>8 A. I don't -- obviously that was a different deployment,</p> <p>9 responding to a different set of circumstances.</p> <p>10 Q. What were the different set of circumstances?</p> <p>11 A. Well, the different set of circumstances at that point</p> <p>12 was the hacksaw that had been seen on the 29th, building</p> <p>13 that on top of stolen vehicle, false registration</p> <p>14 plates, on the back of the intelligence regarding</p> <p>15 David Totton getting a passport with false documents.</p> <p>16 That was responding to that. This was responding to</p> <p>17 a different set of intelligence.</p> <p>18 Q. Why did any of the three things you have just mentioned</p> <p>19 there affect whether the safest option was to prevent</p> <p>20 the vehicle from getting to Culcheth? What was it</p> <p>21 Mr Lawler described?</p> <p>22 A. Because the previous crime, the lie in wait crime that</p> <p>23 had occurred previously, which had the intelligence, the</p> <p>24 email that we have seen a number of times, the -- sorry.</p> <p>25 The email that we had seen previously. Sorry.</p> <p style="text-align: center;">Page 44</p>

<p>1 Can you just ask me the question again, please, sir?</p> <p>2 Q. Yes. We have seen that Mr Lawler's strategy was to</p> <p>3 prevent the vehicle from getting to Culcheth --</p> <p>4 A. Yes, I will carry on. Yes, it was. That was</p> <p>5 a completely different type of robbery, it was a lie in</p> <p>6 wait robbery. I explained to you today, I couldn't</p> <p>7 remember why we had this unusual first tipping point</p> <p>8 about one person, but there was something in my mind in</p> <p>9 terms of we didn't want to get to a kind of</p> <p>10 siege/hostage type situation.</p> <p>11 Q. Why could that not be the same this night, on the 3rd?</p> <p>12 A. It was different intelligence. Obviously, the tipping</p> <p>13 points are discussed with Mr Granby and that's what had</p> <p>14 been agreed.</p> <p>15 Q. When you say, "Different intelligence", are you</p> <p>16 referring to material that you wish to discuss in</p> <p>17 closed?</p> <p>18 A. Yes.</p> <p>19 Q. Did that material, that you wish to discuss in closed,</p> <p>20 exclude the possibility that this was going to be a lie</p> <p>21 in wait robbery?</p> <p>22 A. It didn't -- it didn't suggest that that is what it was</p> <p>23 going to be.</p> <p>24 Q. No.</p> <p>25 A. My -- sorry.</p> <p style="text-align: center;">Page 45</p>	<p>1 A. Yes.</p> <p>2 Q. Which Mr Granby has not written down. He has written</p> <p>3 down they are all in jogging suits, which you haven't</p> <p>4 written down.</p> <p>5 A. No, I think he carries on his and then says -- the last</p> <p>6 word says, "All" and then --</p> <p>7 Q. Yes, I see, over the page, "Wearing gloves". So he has</p> <p>8 both of these down?</p> <p>9 A. Because DC Clark had initially said that he thought they</p> <p>10 were all wearing gloves.</p> <p>11 Q. I see. Then he records:</p> <p>12 "No one apparently carrying anything."</p> <p>13 A. Yes.</p> <p>14 Q. Did you hear that?</p> <p>15 A. I would have heard it.</p> <p>16 Q. Was that significant? That nobody was carrying</p> <p>17 anything, presumably when they got into the car?</p> <p>18 A. Yes, it would have been fairly significant. I did --</p> <p>19 Q. That they are not carrying a weapon, for example?</p> <p>20 A. Yes. I did have a concern that there may be another</p> <p>21 vehicle involved.</p> <p>22 Q. Yes. Never mind about that for the moment. The three</p> <p>23 men weren't apparently carrying anything. That was</p> <p>24 significant information?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 47</p>
<p>1 Q. Did you have a discussion with Mr Granby at about this</p> <p>2 time, when the vehicle was making off towards Culcheth,</p> <p>3 "Why don't we stop it from arriving?"</p> <p>4 A. No. I can't remember saying that. I don't think I have</p> <p>5 said that to Mr Granby.</p> <p>6 Q. Can we look, please, at a third file. Leave those ones</p> <p>7 out, please. A third file, which is your file, number</p> <p>8 1.</p> <p>9 A. Yes.</p> <p>10 Q. At tab 16, page 425.</p> <p>11 A. Yes.</p> <p>12 Q. Can you see Mr Granby's note, at the foot of the page,</p> <p>13 at 18.27:</p> <p>14 "VW stopped near Audi. OP monitoring Audi. Three</p> <p>15 on board."</p> <p>16 That is the reflection of the evidence that you have</p> <p>17 given us of DC Clark.</p> <p>18 A. Yes.</p> <p>19 Q. I think that says:</p> <p>20 "Grainger driver. Totton front seat. Unknown in</p> <p>21 rear. All in jogging suits."</p> <p>22 A. Yes.</p> <p>23 Q. Did you hear that broadcast?</p> <p>24 A. Yes, that was DC Clark's.</p> <p>25 Q. You have written down that they are all wearing gloves.</p> <p style="text-align: center;">Page 46</p>	<p>1 Q. You were saying you had a concern that there might be</p> <p>2 another vehicle involved?</p> <p>3 A. Yes.</p> <p>4 Q. What was your concern?</p> <p>5 A. Firstly, they had previously had two vehicles when they</p> <p>6 had travelled to Stoke-on-Trent and then, again,</p> <p>7 something that we are going to discuss in closed court,</p> <p>8 so ...</p> <p>9 Q. Yes, what, and you therefore thought that any weapons</p> <p>10 might be in the second vehicle; is that what you are</p> <p>11 saying?</p> <p>12 A. No, I am -- what I am saying is I was mindful that there</p> <p>13 may be a second vehicle.</p> <p>14 Q. Okay.</p> <p>15 Moving on in Superintendent Granby's note, over the</p> <p>16 page, to 426.</p> <p>17 A. Yes.</p> <p>18 Q. He says:</p> <p>19 "Subjects in car to Culcheth centre. Several [I am</p> <p>20 not sure what that word is] and ..."</p> <p>21 A. "Reciprocals."</p> <p>22 Q. What?</p> <p>23 A. "Reciprocals."</p> <p>24 Q. What is a reciprocal in police speak?</p> <p>25 A. When a car goes down one street and then comes back on</p> <p style="text-align: center;">Page 48</p>

1 **itself.**
 2 THE CHAIRMAN: Down a different street or the same street?
 3 **A. No, the same street, so it may be a U-turn or it might**
 4 **be just turning round in the street.**
 5 MR BEER: "... and back streets. Audi parks off
 6 Jackson Avenue. Seeking clarification if all three
 7 leave vehicle."
 8 **A. Yes.**
 9 Q. Did you hear him seek clarification as to whether and
 10 when all three men left the vehicle?
 11 **A. I don't specifically remember it, but we had the DSU --**
 12 **we call them blue liaison. He was the DI, he was with**
 13 **us, so that conversation has probably taken place.**
 14 Q. Why was it important to know if the three men left the
 15 vehicle?
 16 **A. Well, it was -- it would have been a real concern if**
 17 **they had left the vehicle.**
 18 Q. This sentence is capable of a couple of meanings.
 19 **A. Yes.**
 20 Q. Did you understand the clarification sought was whether
 21 the men had left the vehicle already, or he was asking,
 22 "If all three people leave the vehicle, please tell me"?
 23 **A. I don't know, sir. Again, I don't know what he has**
 24 **referred that to.**
 25 Q. You were there --

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1 **A. I know I was there, but this is what he has written**
 2 **down. I don't remember what words he has used, whether**
 3 **he has spoken direct to DI Hughes. Clearly, I was in**
 4 **the room with him so I would have heard it, but I can't**
 5 **honestly say.**
 6 Q. They appear to be the two possibilities, that he is
 7 seeking clarification as to whether the men have already
 8 left the vehicle.
 9 **A. No. No. Sorry. Sorry. No.**
 10 **Because of the VTD that was fitted to the vehicle,**
 11 **I knew that the vehicle hadn't stopped. Although there**
 12 **wasn't a lot of surveillance sightings, they do what**
 13 **they call "clipping", which means that they don't**
 14 **compromise their positions, then, by being right on top**
 15 **of the subject vehicle. So -- but the vehicle from**
 16 **leaving Worsley to getting to Culcheth didn't -- I think**
 17 **it stopped for a very, very short period of time. Held**
 18 **at lights perhaps, but there had been no suggestion, at**
 19 **any point, that anybody had got out of the vehicle. If**
 20 **we look at it that way, then it is seeking clarification**
 21 **that he doesn't want anybody to get out of the vehicle.**
 22 **If that would have happened, that would have caused us**
 23 **major concerns.**
 24 Q. It doesn't say that he doesn't want anyone getting out
 25 of the vehicle --

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1 **A. He is seeking clarification if they leave --**
 2 Q. If they leave the vehicle, isn't he?
 3 **A. Yes.**
 4 Q. Why would that be important; to know when they had left
 5 the vehicle?
 6 **A. Well, we wouldn't want them to have left the vehicle, so**
 7 **it would be important because we would need to have**
 8 **surveillance assets available to tell us exactly where**
 9 **they were. Whilst they were in the vehicle, because we**
 10 **had the vehicle tracking device, we could say safely**
 11 **where they were.**
 12 Q. You could say where the vehicle was.
 13 **A. Sorry, we could say where the vehicle was.**
 14 Q. Did you hear him issue an instruction, "Under no
 15 circumstances are they to get out of the vehicle"; ie we
 16 need to make an intervention before they get out of the
 17 vehicle?
 18 **A. I didn't hear that, no.**
 19 Q. I don't think you have any notes about any of this at
 20 all, have you?
 21 **A. No, I haven't. I haven't, sir.**
 22 Q. I am sorry, it is 11.45.
 23 THE CHAIRMAN: Take a break.
 24 MR BEER: Sir, so that you know, I have told you that we
 25 were likely to go beyond the hour that I said.

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1 THE CHAIRMAN: Yes.
 2 MR BEER: That is in part because other core participants
 3 have indicated the times that they are likely to be with
 4 the witness and we are still likely, with the closed
 5 hearing this afternoon, to finish this witness today.
 6 THE CHAIRMAN: Yes, right. Thank you very much. We will
 7 take the usual break of 10 minutes.
 8 (11.44 am)
 9 (A short adjournment)
 10 (11.55 am)
 11 MR BEER: Thank you, sir.
 12 Mr Cousen, can we look, please, at the surveillance
 13 log for 3 March, which we have open. Can you see the
 14 entry at 6.45 pm:
 15 "Subject vehicle left into a car park off
 16 Jackson Avenue, having travelled Jackson Avenue towards
 17 Common Lane, opposite the Post Office."
 18 **A. Yes.**
 19 Q. So, at 6.45, it seems we have the vehicle, the stolen
 20 Audi, in the car park.
 21 **A. Yes.**
 22 Q. Can we look at your notes, please, at page 1249.
 23 **A. Yes.**
 24 Q. Do you see, about eight entries in, it says "Car park"?
 25 **A. Yes.**

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1 Q. Does that relate to you hearing that the vehicle was in
 2 the car park?
 3 **A. It must have been in the car park at the time, yes.**
 4 Q. Thank you. Then, your next entry, can you read that
 5 out, please?
 6 **A. Yes:**
 7 **"Possibly left vehicle."**
 8 Q. Is that that the subjects had possibly left the vehicle?
 9 **A. It is from the vehicle tracking device. When the car**
 10 **becomes stationary it goes into a dormant mode, and**
 11 **then, if there is movement, then they would shout up**
 12 **over the air to say -- somebody would shout up over the**
 13 **radio and say there is movement at the vehicle. So that**
 14 **entry there, "Possibly left vehicle", it has not come**
 15 **from anybody saying physically, "Somebody has left it",**
 16 **it has come from somebody shouting over the radio to say**
 17 **there is movement at the vehicle.**
 18 Q. Was it clarified whether they had left the vehicle?
 19 **A. No -- well, at this point, I have then asked to say we**
 20 **need to make sure that the subjects are in the vehicle.**
 21 **I think we had had eyes on initially and then there had**
 22 **been a break between that time.**
 23 Q. And eyes had been lost?
 24 **A. Yes. We had eyes lost in terms of on the actual**
 25 **vehicle, we had surveillance assets wrapped right round**

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1 **the car park but not necessarily with an eyeball on to**
 2 **the car, but certainly any places where vehicles could**
 3 **leave, come in and go, that was covered, and any kind of**
 4 **egress/exit points on foot, that was also covered. So,**
 5 **albeit I was satisfied that they had not left and walked**
 6 **out of that area, I needed to kind of satisfy myself**
 7 **that they were in the vehicle before we could go to**
 8 **State Amber.**
 9 Q. It follows that there was a time when visual contact had
 10 been lost with the vehicle in a way that could ensure
 11 that you were satisfied that the subjects were still in
 12 the vehicle.
 13 **A. Yes, there had been some movement from the VTD which --**
 14 **because they shout up and say, "There is indication**
 15 **there's movement of the vehicle", it goes dormant. We**
 16 **have not seen anybody leaving, we have got coverage**
 17 **there. I was as satisfied as I could be, but that was**
 18 **purely from a technical basis, which is why I needed to**
 19 **make sure that there was eyes on.**
 20 Q. Then was, therefore, the DSU tasked urgently to
 21 establish whether there were people in the vehicle and,
 22 if so, who?
 23 **A. They was tasked with identifying if there were people in**
 24 **the vehicle. As I have said, I was reasonably satisfied**
 25 **that nobody had been seen to leave the car park, either**

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1 **in that vehicle or -- well, we had the VTD, so we'd know**
 2 **if the vehicle had moved but in other vehicles -- we had**
 3 **surveillance assets plotted right round, so they had not**
 4 **left on foot. But it was dark, so it would be very**
 5 **difficult for them to -- well certainly the third person**
 6 **who was in the back, because it's tinted windows, so you**
 7 **wouldn't see who was in the back of the vehicle.**
 8 Q. When did you first know that the vehicle had tinted
 9 windows?
 10 **A. I don't know, to be honest. I don't know.**
 11 Q. It was not on this day?
 12 **A. No.**
 13 Q. It was well before the 3rd?
 14 **A. Yes. I don't know when it was, but I did know --**
 15 **I think I make some reference to it somewhere in one of**
 16 **my books. I can't remember where but ...**
 17 Q. Do you remember passing that on to the firearms
 18 commander, Mr Granby, so that the firearms officers
 19 could be briefed up about it?
 20 **A. I think they had a photograph of the vehicle.**
 21 Q. What, which showed the tinted windows?
 22 **A. Well, I am pretty sure they have seen a photograph of**
 23 **the vehicle.**
 24 Q. Okay, we will look for that, but can you remember
 25 briefing anyone that it has got tinted windows, so you

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1 cannot see in from the sides?
 2 **A. I can't remember, other than knowing that it was**
 3 **a really kind of high performance -- I think at the time**
 4 **it was one of only five in the country on that**
 5 **particular spec.**
 6 Q. I am more interested in the tinted windows.
 7 **A. No, I know you are.**
 8 **Just while we are on that, and jumping back to the**
 9 **question that you asked me earlier in terms of the**
 10 **stopping of the vehicle en route from --**
 11 Q. Boothtown to Culcheth?
 12 **A. Yes. I know that certainly there had been a discussion**
 13 **in terms of, if the subjects put their foot down in that**
 14 **vehicle, the concern there in terms of how fast that**
 15 **vehicle was in comparison to the vehicle that they had.**
 16 **So when you asked what type of discussion, that may**
 17 **have come up. I certainly know that the discussion in**
 18 **terms of the performance of that vehicle, that did come**
 19 **up because I think it was an Audi A6 La Monde. That's**
 20 **the spec it was.**
 21 Q. In your notes you say, "In vehicle x3", then an arrow
 22 towards Superintendent Granby.
 23 **A. Yes.**
 24 Q. Who did you get that information from?
 25 **A. "In vehicle x3"?**

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1 Q. Yes.

2 **A. I don't remember where. I think I had asked**

3 **a surveillance officer -- well, through the blue liaison**

4 **I have said: can we put somebody on to the car park so**

5 **that we can say that there is somebody with the vehicle,**

6 **or there are people with the vehicle. It has then**

7 **obviously been transmitted over the air that there is**

8 **occupants with the vehicle and that when I have said to**

9 **Superintendent Granby, "Can we arrest the subjects?"**

10 Q. We have heard evidence from DC Evans, the person that

11 was put on to the car park, that he could only see two

12 people in the car and could not identify who they were.

13 **A. Right.**

14 Q. Where did you get that there were three people in the

15 car from?

16 **A. I don't know where I have got that from.**

17 Q. We have heard evidence from the other surveillance

18 officer, DC Wallace, that he tried but could not

19 identify, one away or the other, whether there was

20 anybody in the car or not.

21 **A. At the point when we have gone to State Amber?**

22 Q. Beforehand, yes. Before amber, he could not see if

23 there was anyone in the car or not.

24 **A. The only reason we have gone to State Amber was because**

25 **I had asked for a vehicle to go on to the car park,**

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1 **or a surveillance asset to go on to make sure that the**

2 **vehicle was occupied. So I have put two there --**

3 Q. No, you put three there.

4 **A. Sorry, I put three there. It is clearly incorrect if**

5 **you are saying the surveillance officer has given that**

6 **evidence too, and no doubt that will be in the log as**

7 **well, so ...**

8 Q. No, in the log, which he subsequently signed, it simply

9 says, "There are persons within the vehicle".

10 You can see that at page 829 of the surveillance --

11 **A. Right, at which point then I want the people arresting.**

12 **Don't forget, at this point, I have still got all**

13 **the surveillance assets wrapped around. So we haven't**

14 **got -- there has been absolutely nothing to say that any**

15 **of the subjects have left that car park, either on foot**

16 **or in another vehicle.**

17 **The surveillance team paint the picture in terms of,**

18 **if there was anybody walking through -- there is**

19 **commentary in that regard. Clearly when they are not**

20 **relying on the subjects. Then that doesn't go into the**

21 **log, they'll only put entries. And, indeed, not every**

22 **entry goes in the log. But I was satisfied that the**

23 **subjects hadn't left. There was nothing that caused me**

24 **to believe that they had left. We still had indications**

25 **from the VTD that there was moving -- you would get**

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1 **a small kind of indication.**

2 Q. I am just interested for the moment to find out who told

3 you there were three people in the vehicle?

4 **A. Well, clearly they have not. Clearly that is**

5 **an assumption on my part, that there are three people in**

6 **the vehicle.**

7 Q. If we look at Mr Granby's note, at page 426 --

8 **A. Yes.**

9 Q. -- at 19.03, he has written as well:

10 "Three on board stolen Audi. With SIO agreed

11 tipping point."

12 **A. Sorry?**

13 Q. His note, at page 426, I think we have still have it

14 open.

15 **A. Sorry, at what time?**

16 THE CHAIRMAN: It is not easy to read.

17 MR BEER: Right in the middle of the two hole-punches:

18 "Three on board stolen Audi. With SIO agreed

19 tipping point."

20 So he has written the same as you, that there's

21 three on board.

22 **A. I mentioned yesterday about assessments, when you are on**

23 **surveillance, and I fully understand we have not had**

24 **a surveillance officer, you have clearly heard the**

25 **evidence already who said there are subjects on board**

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1 **the vehicle.**

2 Q. I don't think he said, "Subjects". He said that there

3 were --

4 **A. Persons.**

5 Q. I don't think he even said, "Persons". I think he

6 actually said, "People".

7 **A. All right, two people.**

8 Q. Yes, two occupants in the car.

9 **A. Okay.**

10 Q. So what --

11 **A. But there was nothing that caused me to believe that**

12 **a third person had left the vehicle. There wasn't any**

13 **of the surveillance operatives -- bearing in mind that**

14 **was a big team that I had out that night, there was**

15 **absolutely nobody that indicated that anybody had come**

16 **away from that vehicle. And there was only a couple of**

17 **egress points. There wasn't any suggestion, at that**

18 **point, that there was any vehicles, where -- if any**

19 **vehicles would have left, then the surveillance teams**

20 **would have been looking in there to say -- and then they**

21 **would have shouted up over the air to say, "Not linked.**

22 **It is not linked". So the assessment was made,**

23 **that albeit we have been told "people", however it is**

24 **phrased, the assessment is made that we have got three**

25 **subjects.**

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1 Q. When you say, "The assessment is made", which refers to
 2 the third person, you made the assessment?
 3 **A. I have made the assessment based on what is coming from**
 4 **the VTD, the fact that I've got a surveillance team**
 5 **wrapped around that car park --**
 6 Q. You say you have a surveillance team "wrapped around",
 7 who was wrapped around?
 8 **A. The surveillance team.**
 9 Q. How many people were wrapped around the car park?
 10 **A. Can I mention how many people were on the surveillance**
 11 **team?**
 12 Q. No, don't tell us how many were on the surveillance
 13 team. How many were wrapped around the car park?
 14 **A. I think pretty much most of the team were wrapped around**
 15 **the car park.**
 16 Q. Were they?
 17 **A. Yes.**
 18 Q. Did they have eyes on the car?
 19 **A. No, sorry, I have explained that, sir, it's not**
 20 **necessarily -- they didn't have eyes on the car, that is**
 21 **the reason I had to send somebody in. What they had is**
 22 **eyes on any entry and exit points into that car park**
 23 **including an alley way.**
 24 Q. Did they have eyes on the cut through to the Cherry Tree
 25 car park?

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1 **A. Yes.**
 2 Q. Where were they?
 3 **A. I have not got the mapping system now. Bear in mind,**
 4 **I am in the ops room, so I can see on the -- because**
 5 **I was quite rightly saying to DI Hughes, "We need to get**
 6 **somebody in there. We need to get somebody in". He was**
 7 **reassuring me, in terms of, "We've got coverage, we've**
 8 **got coverage around there". You know, that is their**
 9 **kind of bread and butter. It is what they do day in and**
 10 **day out.**
 11 Q. How do you know they had not parked next to a car that
 12 had two people in it. Two people had got out of one
 13 car, two people had got out of the other car and --
 14 **A. Well, certainly from the early observations -- we had**
 15 **eyes on it when it first went on there because we had**
 16 **one of the surveillance operatives who was ahead and**
 17 **waiting. There had certainly been no suggestion from**
 18 **any commentary that had come from him to suggest that**
 19 **they had either met up with anybody else, that there was**
 20 **another vehicle that was --**
 21 Q. But there had not been eyes on the car when it was in
 22 the car park?
 23 **A. No, but this is where I was saying -- initially there**
 24 **had been eyes on.**
 25 Q. Yes, and then it was lost.

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1 **A. Yes. But, as I have said, there was no new vehicle that**
 2 **suddenly travelled into --**
 3 Q. No, no, there were lots of cars on the car park already.
 4 **A. Absolutely, but the officer, the surveillance officer,**
 5 **if there was another car that had two, three, however**
 6 **many people in there, then they would have relaid that**
 7 **over the air to us to say, "Look, we have got another**
 8 **vehicle here, it has some people, it may be connected",**
 9 **and then we may have asked, "Right, can we just send**
 10 **somebody into research, check the vehicle, get the**
 11 **registration number, check the PNC, check to see if**
 12 **there is any intelligence on that vehicle and then to**
 13 **either implicate or implement it", but there was**
 14 **absolutely nothing in that regard.**
 15 **So I was satisfied that it was a fair assessment**
 16 **that they were still within that vehicle, but I wanted**
 17 **that confirmation before we went to the State Amber.**
 18 Q. Why did you want confirmation if you were satisfied for
 19 all of the reasons that you have given?
 20 **A. Yes.**
 21 Q. Why did you need to know if there were still people in
 22 the car?
 23 **A. Because I didn't want them to then suddenly run out as**
 24 **our arrest capability then goes into the car park.**
 25 Q. Isn't it the case that because eyes on had been lost on

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1 this vehicle for a period of time, that you didn't know
 2 whether they were still in the car, and if they were
 3 still in the car, who was still in the car?
 4 **A. Well, I was -- sorry, sir, I thought I had just**
 5 **explained.**
 6 **I was satisfied as much as I could be but clearly**
 7 **I wanted that extra confirmation, with the eyes back on.**
 8 Q. And you didn't get extra confirmation that the subjects
 9 were still in the car, you just got there were two
 10 people in the car with no identities?
 11 **A. I think you said, sir, it's people, people in the car,**
 12 **but there had been nothing to indicate either from the**
 13 **technical or the surveillance teams to say anything to**
 14 **the contrary.**
 15 Q. By this time, I think it had been agreed that the
 16 operation was going to be closed down by 8.00 if nothing
 17 happened, is that right?
 18 **A. I think it was being reviewed at 8.00.**
 19 Q. No, closed down at 8.00. Is that right?
 20 **A. I can't remember. It may have been, I can't remember.**
 21 Q. Can we look, please at tab 15.
 22 **A. Yes.**
 23 Q. In your bundle at page 340. This is part of
 24 Mr Sweeney's log.
 25 **A. Okay.**

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<p>1 Q. Have you got that?</p> <p>2 A. Yes.</p> <p>3 Q. Can you see the entry for 17.49, underneath the blacking</p> <p>4 out?</p> <p>5 A. Yes.</p> <p>6 Q. He has written that he agreed with the tactical firearms</p> <p>7 commander, "Close down by 8.00 if no significant</p> <p>8 operational development".</p> <p>9 Did you know that, that the operation was going to</p> <p>10 be closed down at 8.00?</p> <p>11 A. I would have known that. I think the last line though</p> <p>12 is kind of the indication that we need to be looking at,</p> <p>13 "... if no significant operational developments".</p> <p>14 Well, there had been significant operational</p> <p>15 developments, so hence -- I see the point you are</p> <p>16 making.</p> <p>17 Q. I haven't made any point yet.</p> <p>18 A. You did ask me the question, was it being shut down at</p> <p>19 20.00 hours.</p> <p>20 Q. Yes, if there was no significant operational</p> <p>21 development.</p> <p>22 A. Yes.</p> <p>23 Q. Did you feel under any pressure to go to State Amber and</p> <p>24 make arrests because you knew that at 8.00 this</p> <p>25 operation was being closed down?</p> <p style="text-align: center;">Page 65</p>	<p>1 Q. Did you give him such information?</p> <p>2 A. No. I don't know what that information relates to.</p> <p>3 Q. Neither do we. But it is what Q9 says in his interview.</p> <p>4 A. Right.</p> <p>5 Q. When he was interviewed, he said the things that were</p> <p>6 operative on his mind when deciding to shoot, amongst</p> <p>7 them was he had been given information that Mr Grainger</p> <p>8 was "involved in the supply of firearms in 2008".</p> <p>9 A. No.</p> <p>10 Q. B30 for your note, sir.</p> <p>11 A. That's been said that I presented that information?</p> <p>12 Q. No, no. I haven't said you did. I am saying as far as</p> <p>13 you are aware, was Q9 ever given information that</p> <p>14 Mr Grainger was involved in the supply of firearms?</p> <p>15 A. I have not given him that and I am not aware -- I have</p> <p>16 not been anywhere where anybody else has. But I don't</p> <p>17 actually know what that relates to, but I can't honestly</p> <p>18 say that in answering for Q9 because Q9 may have had</p> <p>19 a conversation with somebody else.</p> <p>20 Q. I know, I am just trying to narrow down the people that</p> <p>21 might have said this to him or might have heard it being</p> <p>22 said to him.</p> <p>23 Let's look at his interview so we can just see what</p> <p>24 he says. B30.</p> <p>25 Forgive me a moment. (Pause)</p> <p style="text-align: center;">Page 67</p>
<p>1 A. No.</p> <p>2 Q. Had you said anything to Q9 -- you know who Q9 is, the</p> <p>3 firearms officer?</p> <p>4 A. I don't know who Q9 is.</p> <p>5 Q. The firearms officer who fired the shot.</p> <p>6 A. I know who Q9 is in terms of this but I don't know the</p> <p>7 identity of Q9.</p> <p>8 Q. Did you say anything either to him directly or in a room</p> <p>9 in which he was present which "left him in no doubt that</p> <p>10 Anthony Grainger was in possession of a firearm on</p> <p>11 3 March"?</p> <p>12 A. No, absolutely not.</p> <p>13 Q. Did you hear anyone else give Q9 information, or see</p> <p>14 information that was given to Q9, which would have left</p> <p>15 Q9 in no doubt that he was in possession, Mr Grainger</p> <p>16 was in possession, of a firearm on 3 March?</p> <p>17 A. Not that I am aware of, sir, no.</p> <p>18 Q. So far as you were aware, was Q9 ever given information</p> <p>19 that Anthony Grainger was involved in the supply of</p> <p>20 firearms in 2008?</p> <p>21 A. I don't know what that is in relation to, sir.</p> <p>22 Q. It is what he said, Q9, in his interview, that he was</p> <p>23 given information that Mr Grainger had been involved in</p> <p>24 the supply of firearms in 2008.</p> <p>25 A. No.</p> <p style="text-align: center;">Page 66</p>	<p>1 You know the identity of the firearms officer that</p> <p>2 shot Mr Grainger?</p> <p>3 A. Do I know the identity?</p> <p>4 Q. Yes.</p> <p>5 A. No.</p> <p>6 Q. In which case we will have to rise and get the laminated</p> <p>7 sheet. I think Ms Whyte makes a sensible point and we</p> <p>8 will get the laminated sheet.</p> <p>9 THE CHAIRMAN: That is a practical suggestion.</p> <p>10 (12.17 pm)</p> <p>11 (A short adjournment)</p> <p>12 (12.25 pm)</p> <p>13 THE CHAIRMAN: Yes, Mr Beer.</p> <p>14 MR BEER: Thank you.</p> <p>15 I think you have now been given a cypher key with</p> <p>16 the identity of Q9 on it?</p> <p>17 A. Yes.</p> <p>18 Q. Do you know or recognise his name?</p> <p>19 A. Yes, I recognise the name. I don't know the person but</p> <p>20 I do recognise the name.</p> <p>21 Q. Do you recognise him as somebody that was present in the</p> <p>22 course of the morning briefing on 3 March?</p> <p>23 A. Yes.</p> <p>24 Q. Okay, thank you.</p> <p>25 So far as you were aware, in your presence, was Q9</p> <p style="text-align: center;">Page 68</p>

1 ever given information that Mr Grainger was involved in
 2 the supply of firearms in 2008?
 3 **A. Not in relation to Operation Shire he wasn't, no.**
 4 Q. The robbery in 2000, the Bolton robbery, at which
 5 a firearm was discharged at police officers, do you
 6 remember that?
 7 **A. Yes.**
 8 Q. Did you mention that robbery to anyone in the AFO team
 9 on 3 March?
 10 **A. No.**
 11 Q. Did you mention it in the course of the briefing on
 12 1 March?
 13 **A. It has never been mentioned by me?**
 14 Q. Can you remember whether it was mentioned in that
 15 briefing on 1 February?
 16 **A. I can't remember it being mentioned but there would be**
 17 **no reason for it to be mentioned.**
 18 Q. Can we just look, please, at file F/1148.
 19 **A. Yes.**
 20 Q. Would you forgive me whilst I catch up. (Pause)
 21 This is part of the briefing on 1 February 2012.
 22 THE CHAIRMAN: Do you mean 1 February?
 23 MR BEER: Yes, I think so. Yes, I do.
 24 If you just go back to 11.46, you can see the front
 25 page of it.

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1 THE CHAIRMAN: Thank you.
 2 MR BEER: If you also look at 11.46, you can see that you
 3 are present and Q9 is present?
 4 **A. Yes.**
 5 Q. At 11.48, if you look at the top paragraph where it says
 6 "Sorry" --
 7 **A. Yes.**
 8 Q. -- then about four lines in it says:
 9 "Although there is no specific information in
 10 relation to the use of firearms for this operation,
 11 Subject 1 has previous marking for possession of
 12 a shotgun. Intelligence also links Subject 1 to the
 13 planning/preparatory phases of armed robberies in the
 14 north-west area whereupon firearms have been discharged,
 15 on one occasion at police."
 16 Can you see that?
 17 **A. Yes.**
 18 Q. Subject 1 is David Totton.
 19 **A. Yes.**
 20 Q. You said there would be no reason for mentioning the
 21 discharge of firearms at police in such a briefing. Why
 22 would there be no --
 23 **A. I had not briefed on it. I think -- I have been asked**
 24 **to give a statement in this regard I think previously.**
 25 **I think this suddenly turned up on this particular**

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1 **briefing and I was asked the question, why has it**
 2 **suddenly turned up? And I didn't know the reason why it**
 3 **had suddenly been on there.**
 4 **I know that from the briefing that DC Clark gave,**
 5 **I think that is the only time that it had ever been**
 6 **mentioned or, if it had actually been mentioned at that**
 7 **time -- perhaps we could have a look at the briefing to**
 8 **Mr Ellison.**
 9 Q. Yes, we can look at that, but if we just track it
 10 through for the moment.
 11 What this is saying to those present is that,
 12 although there is no information in relation to the use
 13 of firearms, David Totton "has been linked to the
 14 planning/preparatory phases of armed robberies in the
 15 north-west, whereupon firearms have been discharged",
 16 and that on one occasion that has been at police
 17 officers.
 18 So multiple occasions where Mr Totton has discharged
 19 a firearm, and on one occasion he has discharged
 20 a firearm at police officers, is what is being said?
 21 **A. "... firearms have been discharged, on one occasion at**
 22 **police".**
 23 Q. Yes, so firearms discharged --
 24 THE CHAIRMAN: That is as it is punctuated there, in the
 25 transcript.

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1 MR BEER: Exactly.
 2 So this didn't indicate that Mr Grainger, who was
 3 Subject 3 I think in this briefing, was involved in any
 4 way in that robbery at which a firearm was discharged at
 5 police officers?
 6 **A. No.**
 7 Q. Were you ever present at a briefing when Q9 was informed
 8 that Mr Grainger was involved in any way in this
 9 robbery?
 10 **A. No.**
 11 Q. Can we look, please, at Q9's interview, which is folder
 12 B at 79. We had better start at 78, please, so we can
 13 read the context of his whole answer.
 14 **A. Yes. Yes.**
 15 Q. He is saying at the top of the page:
 16 "It is my knowledge it is a risk assessment meeting
 17 at the outset of Operation Shire."
 18 "Okay."
 19 "The intelligence has come from there. It has been
 20 discussed on some occasion which I cannot recall
 21 exactly, when within the operations team and when we are
 22 held up at Leigh police station I have brought up this
 23 information saying I am sure it is this organised crime
 24 group who are involved in the armed robbery at Bolton
 25 where the police vehicle was fired upon and the reason

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<p>1 we went through the discussion was because an ex 2 operations team sergeant was involved in the 3 reconstruction of that robbery." 4 "Right, okay, and are we talk being the same 5 subjects in that robbery?" 6 "We are talking about the same organised crime 7 group." 8 "Right, okay. So the group which involved Grainger 9 Totton and Rimmer they were part of, you know --" 10 "Yes." 11 "A group of a larger team of armed robbery robbers." 12 "That's right." 13 "In fact, if we look, if we refer to the first 14 briefing I think you were actually involved in, clearly 15 there are names in that other, obviously subjects we are 16 familiar with on the day of the operation." 17 "Yes, it was discussed in Leigh that I thought these 18 were involved and I think it was X-ray 7 said, 'Well, 19 no, because the actual subjects who committed that 20 robbery have been convicted', and I said, 'Well, yeah, 21 perhaps they have been convicted. Yeah, but this was 22 the same organised crime group." 23 So it appears that Q9 was talking about two things 24 then, a previous occasion when he had been briefed about 25 the robbery in Bolton, where somebody had discharged</p> <p style="text-align: center;">Page 73</p>	<p>1 knowledge, had worked in Salford for a long time, so he 2 was actually invited into the meeting. 3 Q. Did you take any steps to verify what DC Clark had said? 4 A. I wasn't actually -- once he was invited into the 5 meeting, I actually then went -- I had to go and ring 6 the DCI -- I can't remember his name offhand -- over at 7 Staffordshire. So I was there for -- at various times, 8 but I was popping in and out because, at the time, 9 Mr Ellison wanted to know who was going to have 10 ownership of the investigation, whether it would be 11 Staffordshire or whether it would GMP, which is why 12 I had to go and make the inquiries. It was at that 13 point that DC Clark was speaking to -- 14 Q. I have looked at your casebook for this. And for your 15 note, sir, it is K/1191. We needn't go there. 16 THE CHAIRMAN: No. 17 MR BEER: I don't think there is a note made by you of what 18 was said by DC Clark in that meeting. 19 A. No. 20 Q. Did you take any steps after the meeting to verify the 21 information that DC Clark had been provided? 22 A. I can't remember doing, if I am being honest. But then 23 again, I wasn't there the whole time. I think he did. 24 THE CHAIRMAN: Who is "he"? 25 A. DC Clark.</p> <p style="text-align: center;">Page 75</p>
<p>1 a firearm, and then when he was laid up at Leigh police 2 station, on the 3rd, having a discuss with X7, his team 3 leader effectively, saying, "Well, hold on, the actual 4 subjects who committed that robbery have been 5 convicted", and he said, "Well, perhaps they have been 6 convicted, but it is the same organised crime group." 7 Do you know who was convicted of the robbery in 8 Bolton? 9 A. No, I would have to go and look for you, sir. 10 Q. You mentioned earlier, I think, that it was DC Clark who 11 mentioned this. Was that when he first told you about 12 it, back on 25 January, when he was brought into 13 a meeting? 14 A. Yes, he was brought in -- 15 Q. At short notice? 16 A. He was brought into a meeting at short notice. 17 Q. Can you confirm that at that meeting, with you and the 18 tactical firearms commander, on 25 January, Mr Clark 19 made his presentation briefing without any notes or 20 preparation? 21 A. He did, yes. I had asked for him -- I had been asked 22 for some more information on the subjects and I had gone 23 to -- well, there were two options. I could either go 24 and sit down at the computer and try and find some 25 information out, but there was DC Clark who had a wide</p> <p style="text-align: center;">Page 74</p>	<p>1 MR BEER: To verify the accuracy of what he was saying? 2 A. Yes, I think he did. When he did that I don't know, but 3 I think he did afterwards. 4 Q. Did you see the crime report for this offence which said 5 that Stuart Grainger was charged with the offence and 6 did not suggest in any way that David Totton was 7 involved? 8 A. No, I had not seen that. 9 Q. For your note, sir, that is G2/1400 to 1406. 10 THE CHAIRMAN: Thank you. 11 MR BEER: Because, you see, what seems to have happened is 12 that a briefing has been given by DC Clark to the TFC, 13 on 25 January. 14 A. Yes. 15 Q. On 1 February, the firearms officers, including Q9, were 16 told that it was Mr Totton that was responsible for the 17 discharge of firearms, including at a police officer. 18 Are you aware that there is not any evidence to support 19 that, at all? 20 A. I didn't remember it even being on the briefing to be 21 honest, sir, so ... 22 Q. Then Q9, when laid up at the police station on the 3rd, 23 has remembered back to that and has said, "Okay, albeit 24 some people were convicted for that offence, they are 25 all part of the same OCG".</p> <p style="text-align: center;">Page 76</p>

1 **A. Well, I have obviously just read what Q9 has said.**
2 **I don't know the reason why it suddenly appeared on that**
3 **briefing. Because the first time that the briefing had**
4 **been made, on the 26th, it was not on there and it was**
5 **not deemed relevant there. So somebody from within the**
6 **Tactical Firearms Unit has decided, at some point, that**
7 **it needs to go on there, but I don't know who that is.**
8 THE CHAIRMAN: After the 26 January briefing; is that what
9 you are saying?
10 **A. Yes, it doesn't appear, I don't think until --**
11 MR BEER: We have an officer, on 3 March, using his
12 knowledge that he has acquired a month or so previously.
13 **A. Yes.**
14 Q. I think it is right that you looked into this and found
15 that the information provided by DC Clark was not
16 recorded on intelligence logs; is that right?
17 **A. As in it is not recorded at the time.**
18 Q. I'm just looking, and these are the last few questions
19 I will ask, at tab 10 of your bundle, please. You
20 probably need a reconciliation of bundles.
21 **A. Thank you.**
22 **(Pause)**
23 THE CHAIRMAN: Mrs Shaw will help you.
24 **A. Thank you.**
25 **Sorry, tab?**

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1 MR BEER: Tab 10, please, which I think was the report you
2 were referring to earlier when you said, "I have been
3 asked about this before."
4 **A. Yes.**
5 Q. At the foot of the page, the second paragraph from the
6 bottom, you say:
7 "The intelligence relating to the shotgun being
8 discharged at police officers came from DC Clark. He
9 has a vast knowledge of Salford OCGs, and
10 Superintendent Ellison had requested further information
11 at the meeting, on 25 January."
12 That is the one we have been talking about.
13 **A. Yes.**
14 Q. "I am unaware why this information was only put on the
15 3 February briefing ..."
16 I think that is the 1 February briefing, actually.
17 **A. Yes, okay.**
18 Q. "The briefing is prepared by a representative from the
19 TFU and is reviewed by the TFC. They may be able to
20 provide further information in this regard."
21 And then you say:
22 "The information provided by DC Clark was not
23 recorded on intelligence logs."
24 What led me to suggest that you had looked at the
25 intelligence logs and established that what DC Clark was

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1 saying about --
2 **A. It may have been that, sir, but it may have also been**
3 **that DC Clark wasn't reading from intelligence logs.**
4 **I think it is probably the former, to be honest.**
5 Q. What do you mean?
6 **A. The information provided by DC Clark was not recorded on**
7 **intelligence logs, so he has not gone into the briefing**
8 **with intelligence logs.**
9 **If I could just read -- if you just bear with me one**
10 **second.**
11 **(Pause)**
12 **So it might be something -- that might be something**
13 **where DC Clark is aware of intelligence logs, but it is**
14 **not something that I was aware of. He might have been**
15 **aware because of his time working in Salford and his**
16 **time prior to me working in the Force Robbery Unit. But**
17 **I certainly didn't get given any intelligence logs to**
18 **then provide.**
19 Q. Or supporting what you had heard, on 1 February?
20 **A. I don't remember hearing that, but it was obviously on**
21 **the briefing.**
22 Q. On the 3rd, did you hear anyone issue a warning to the
23 AFOs that they shouldn't take into account past
24 knowledge of the OCG generally because you had split the
25 operation by then, to treat it effectively as two

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1 operations; one concerning the Corkovics and one
2 concerning Mr Totton and others?
3 **A. I didn't hear that, but just by pure definition, the**
4 **briefing, if it was still to include the Corkovics, they**
5 **would have been on the briefing.**
6 **I think, right at the start, you had a number of**
7 **different subjects on the briefings. So on the 26th and**
8 **the first part of February, you would have the**
9 **Corkovics, David Totton, Robert Rimmer and Anthony was**
10 **on there.**
11 **By the time of this particular briefing, there was**
12 **no mention at all of the Corkovics. So the fact that**
13 **they are not on there -- it wasn't mentioned**
14 **specifically, but I think the fact that they are not**
15 **directed to the Corkovics, or indeed anybody else, would**
16 **indicate that the people they're briefed on is the**
17 **people who they would be thinking about.**
18 Q. You can see what Q9 has done here, he has taken into
19 account information on a previous briefing.
20 **A. I can see what Q9 has thought.**
21 MR BEER: Thank you very much. Those are the only questions
22 I ask.
23 THE CHAIRMAN: Mr Straw?
24
25

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1 Questions from MR STRAW
 2 MR STRAW: Detective Chief Inspector, I am Adam Straw and
 3 I ask questions on behalf of Anthony's mother,
 4 stepfather and brother.
 5 On the topic Mr Beer was just asking you about, did
 6 you ever say to Q9 that David Totton and
 7 Anthony Grainger were convicted of possession of
 8 a shotgun in 1999?
 9 **A. No.**
 10 Q. Did you ever hear anyone else say that to Q9?
 11 **A. No.**
 12 Q. Could you turn to bundle H, please. This is your
 13 statement. It is actually also in your witness
 14 bundle --
 15 THE CHAIRMAN: Hang on. Hang on. Just let me find it.
 16 (Pause)
 17 MR STRAW: Sir, if it is easier, it is also in the witness
 18 bundle.
 19 THE CHAIRMAN: Right, okay. Do you have the reference for
 20 that?
 21 MR STRAW: The first witness bundle, tab 6.
 22 THE CHAIRMAN: Thank you.
 23 **A. So I am going to this?**
 24 THE CHAIRMAN: Yes.
 25 **A. Yes.**

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1 MR STRAW: You mentioned to Mr Beer, on Tuesday I think,
 2 that you had formed the view that Anthony Grainger was
 3 going to be the driver; do you recall that?
 4 **A. Yes.**
 5 Q. If you have a look, please, at page 74 --
 6 **A. Yes.**
 7 Q. -- at the bottom, there, the bottom paragraph, you say
 8 this:
 9 "I formed the view that Anthony Grainger was going
 10 to be the driver and was responsible for sourcing and
 11 moving vehicles around. It was borne out during the
 12 course of the operation, when the vehicles were being
 13 moved by Anthony Grainger. Even though his role may be
 14 considered minor when compared to others in the group,
 15 it is still an integral part and was considered by the
 16 TFCs, as was pointed out to me by a very experienced
 17 TFC, that vehicles can be used as weapons."
 18 **A. Yes.**
 19 Q. So, just so I am clear, you considered that Mr Grainger
 20 would be the driver. He would drive to the location.
 21 The other men would perform the robbery. Mr Grainger
 22 would remain with the car so he was ready to escape when
 23 the other men came out; is that correct?
 24 **A. Potentially, that would be the case, yes.**
 25 Q. Although Mr Grainger would not be carrying a weapon,

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1 probably, because he was the driver and not doing the
 2 offence, vehicles can still be used as weapons; is that
 3 right?
 4 **A. That's correct. That is the conversation that I had had**
 5 **previously with -- I don't name him in this statement**
 6 **but the person who had actually said to me previously**
 7 **was Chief Inspector Lawler.**
 8 Q. Did you pass that on -- so that Mr Grainger would be
 9 staying with the car and probably wouldn't be carrying
 10 a weapon -- to Mr Granby?
 11 **A. I didn't know what would be happening in relation to --**
 12 **on Saturday, 3 March -- I had passed on the fact that**
 13 **I believed that he was going to be the driver because he**
 14 **had possession of the Audi. We didn't know what type of**
 15 **robbery it was, or suspected that was going to be taking**
 16 **place, so we didn't know what the kind of roles were.**
 17 **It was in my mind though that he would be the driver.**
 18 **I can't answer the question in relation to weapons.**
 19 **I think it has been mentioned on -- well, it is**
 20 **mentioned on some of the briefings, certainly on**
 21 **Mr Lawler's briefing. I never presented any information**
 22 **to say that the subjects had weapons. It was always the**
 23 **capability to have access to weapons.**
 24 Q. At that point, your view that he would be staying with
 25 the car and so probably unarmed, that is an important

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1 thing for the AFOs to know, isn't it?
 2 **A. Well, I can't say if he would or if he wouldn't be, can**
 3 **I?**
 4 Q. But you appeared -- sorry, go ahead.
 5 **A. I had not presented anything to say that any of the**
 6 **subjects had definitely got any kind of weapons. So,**
 7 **just because somebody is the driver, doesn't mean to say**
 8 **that they are not going to be -- have something to**
 9 **potentially assist themselves in escape.**
 10 Q. You appeared to agree just now, when I put it to you
 11 a little earlier, that he probably wouldn't have to
 12 be --
 13 THE CHAIRMAN: "Potentially", he said, not "probably".
 14 Potentially.
 15 MR STRAW: And that for firearms officers to know that the
 16 guy in the driver's seat is going to be staying with the
 17 vehicle and so potentially would not have the weapon, it
 18 is a pretty important thing for them to know, isn't it?
 19 **A. As I have just answered you, sir, in relation to what**
 20 **Anthony may or may not have -- yes, I suspected --**
 21 **I believed that he was going to be the driver and that**
 22 **was, to me, corroborated by the fact that he had access**
 23 **to the keys for the Audi and he was moving the vehicle**
 24 **about.**
 25 **In terms of what his role was, I had explained that**

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1 **to Mr Granby. I couldn't speculate as to what anybody**
 2 **within that vehicle would or would not have. I just**
 3 **presented it in terms of the intelligence that I had at**
 4 **the time and what I had been seeing from surveillance.**
 5 Q. On Tuesday, Mr Beer asked you -- and this is page 154
 6 for anyone who has the transcript -- whether you thought
 7 the occupants of the Audi, on the evening of 3 March,
 8 would each be armed.
 9 **A. Yes.**
 10 Q. You said to him:
 11 "I have never presented that information at all,
 12 sir."
 13 And he said:
 14 "So you didn't think that each would be armed?"
 15 And you responded:
 16 "This was about capability, sir, I never, ever,
 17 presented any information at all in that regard."
 18 Do you recall that?
 19 **A. I remember, obviously, being asked the questions, yes.**
 20 Q. So you never ever presented any information, at all,
 21 that each of the subjects would be armed to the firearms
 22 officers; that is because that is wrong, isn't it? It
 23 would be wrong to say that each of the subjects would be
 24 armed?
 25 **A. As I explained, I presented the intelligence as I had**

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1 **it, at the time.**
 2 Q. And there was no information, was there, to show that
 3 each of the subjects would be armed?
 4 **A. No, I never presented that intelligence.**
 5 Q. Could you have a look, please, at bundle C.
 6 **A. Sorry, what page?**
 7 Q. Bundle C --
 8 THE CHAIRMAN: There are three files, Mr Straw, so we need
 9 to know which page.
 10 MR STRAW: I see, thank you. It is page 335.
 11 **A. Thank you. Yes.**
 12 Q. 335, about six lines down, and this, you will remember,
 13 is part of the briefing, on 3 March.
 14 **A. Yes.**
 15 Q. Here we are talking about Anthony Grainger's threat
 16 assessment and it said:
 17 "His intent is conspiracy to commit armed robbery."
 18 I am just emphasising the word "armed" for the
 19 moment. Then, back over the page, to 333, please, just
 20 to remind you, the paragraph towards the bottom of the
 21 page:
 22 "Okay folks, the information that we have got at the
 23 moment is the subjects [plural], who we will see in
 24 a moment, of this operation are believed to be engaged
 25 in armed robberies in the north-west region."

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1 **A. Yes.**
 2 Q. If there was no information to show that each of them
 3 would be armed, did you correct this impression here,
 4 that Mr Grainger and the other subjects would be engaged
 5 in armed robberies?
 6 **A. I had intelligence, as I have detailed I think yesterday**
 7 **afternoon in relation to the subjects, there was**
 8 **mention, certainly on one of those, in relation to armed**
 9 **robberies. I think Mr Beer pointed to me that that**
 10 **mentioned David Totton and others, I think it said.**
 11 **As I have said to you, I had explained exactly what**
 12 **I had intelligence-wise. This was down to capability to**
 13 **get access to weapons, whatever weapons there may be.**
 14 Q. But you didn't, did you, at any stage during that
 15 briefing, stand up and say, "There is no information
 16 that each of the subjects would be armed"?
 17 **A. I have not stood up during the briefing and said that,**
 18 **no.**
 19 Q. Just one or two questions about the subject profile that
 20 Rachel Griffiths produced and, in particular, the entry
 21 about Prestwich in 1995, so the Prestwich robbery in
 22 1995.
 23 **A. Yes.**
 24 Q. Just to orientate ourselves, you explained that after
 25 seeing the subject profile, you looked at the GMPics

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1 record to check and, on that basis, you were of the view
 2 that the entry about lying on file was correct?
 3 **A. Yes.**
 4 Q. Yes?
 5 **A. It didn't make me think it was incorrect, put it that**
 6 **way.**
 7 Q. Do you have the GMPics document still available? It has
 8 now been filed, and it is in file F.
 9 **A. Yes.**
 10 THE CHAIRMAN: That is the first time that I have heard that
 11 it has been filed. It may be that someone has filed my
 12 particular copy for me, but I did have it here. Does it
 13 have a page number in it and I will have a look?
 14 MR STRAW: Yes, F/1255.
 15 THE CHAIRMAN: Right, let me see. Yes, I have it. It has
 16 been filed.
 17 MR STRAW: Great.
 18 Do you have that; 1255(a)?
 19 **A. Yes.**
 20 Q. On the first page, it shows, doesn't it, that two
 21 offenders entered the shop brandishing a large firearm
 22 and so on?
 23 **A. Yes.**
 24 Q. Turn, please, to (p).
 25 **A. Yes.**

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1 THE CHAIRMAN: Hang on, can we catch up, please. We are
 2 jumping from bundle to bundle. It is fine, but we just
 3 need a little bit of time to make some space. It is (p)
 4 now, is it?
 5 **A. That is page (p), isn't it?**
 6 MR STRAW: Sorry, sir, it is page P of this bundle. My
 7 fault.
 8 THE CHAIRMAN: Okay, sorry. 1255(p)?
 9 MR STRAW: Yes, just to remind us of the contents, it notes
 10 there, doesn't it, that Anderson, two Graingers, Totton
 11 and Ellis, the Famous Five Firm, have all been
 12 additionally charged with conspiracy to rob, between
 13 9 October 1995 and 10 June 1996, remanded in custody to
 14 appear --
 15 **A. Yes. Yes.**
 16 Q. Can you go over, please, to 1255(t) of that same bundle,
 17 little t, and it notes:
 18 "Crown Court result entered, remain on file
 19 (Grainger)."
 20 **A. Yes.**
 21 Q. We now know this is wrong, of course, but the document
 22 indicates that Mr Grainger, the conspiracy to rob file
 23 was ordered to remain on file in respect of Mr Grainger;
 24 correct?
 25 **A. Yes.**

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1 Q. You didn't know who Mr Grainger was, you told Mr Beer
 2 that I think yesterday; did you do any research to find
 3 out?
 4 **A. Sorry? I don't see where you are ...**
 5 Q. You told Mr Beer that you didn't know who Mr Grainger
 6 was, whether it was Anthony or Stuart; do you recollect
 7 that?
 8 **A. In relation to -- on here?**
 9 Q. Yes.
 10 **A. No, the point being is it says, "Grainger: remain on**
 11 **file", and that married up with what was on the profile**
 12 **prepared by a subject matter expert from the Force**
 13 **Intelligence Branch. It didn't cause me to go and do**
 14 **further research. Once I had seen that, it didn't make**
 15 **me think, "Hang on a minute, I need to go and do some**
 16 **more research".**
 17 Q. But you were checking, using this document, weren't you,
 18 whether the entry by Rachel Griffiths was correct?
 19 **A. No, I wasn't checking if it was correct, I was looking**
 20 **because there was more information on the -- I did**
 21 **explain this yesterday. That there was more information**
 22 **on the GMPics than what was on the OPUS record.**
 23 **I wasn't checking her work for being correct or not.**
 24 **I was just checking the crime. Because the crime number**
 25 **was mentioned on the subject profile, I knew, or**

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1 **I suspected, that I may get asked questions about it and**
 2 **I didn't want to be in an embarrassing situation when**
 3 **a tactical firearms commander, a senior officer and**
 4 **then, potentially, a strategic firearms commander, you**
 5 **know, a senior ranking officer, and I've got a profile**
 6 **and I don't know the answers to the questions.**
 7 Q. So it is not clear, is it, on the face of the document,
 8 whether this Grainger means Stuart or Anthony?
 9 **A. I see what you are saying, it doesn't say. But I have**
 10 **read through it, I have looked and it marries up with --**
 11 **I've got an expert -- I think I explained this on the**
 12 **first day -- there is an expert from the Force**
 13 **Intelligence Branch who has access to far more**
 14 **intelligence systems than I had access to, even from the**
 15 **PNC. I do not have access to the PNC. That is not**
 16 **something that I am trained in. Yes, I would have had**
 17 **staff available to me but I put my trust in Rachel that**
 18 **the profile was correct. And I wasn't checking up her**
 19 **work, I was just looking to see what -- if there was**
 20 **further information. Indeed, that was borne out once**
 21 **I had checked the crime.**
 22 Q. Well --
 23 **A. I didn't have any reason to suspect that it was wrong.**
 24 Q. I will not repeat the questions Mr Beer has already
 25 asked you about that area. I would just like to return,

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1 please, to the subject profile, and this is in the first
 2 bundle F. I hope that is the easiest way to do it.
 3 THE CHAIRMAN: Yes.
 4 MR STRAW: At the very start, page F/14.
 5 THE CHAIRMAN: Yes, it is also, I think, in the witness's
 6 own bundle. Anyway, yes, I have it.
 7 MR STRAW: Thank you.
 8 F/14, and it is this entry we have looked at towards
 9 the bottom of the page:
 10 "While there are no specific markers on PNC or OPUS
 11 regarding firearms, Grainger has been charged in the
 12 past with 243085B, which is an armed robbery at
 13 a Post Office in Prestwich where a sawn-off shotgun was
 14 used. The result of the case was that it was ordered to
 15 lie on file for Anthony Grainger."
 16 **A. Yes.**
 17 Q. That is different, isn't it, from what GMPics said, in
 18 that GMPics said that he has been charged with
 19 conspiracy, whereas this says he was charged with armed
 20 robbery?
 21 **A. Sorry?**
 22 Q. That is different, isn't it, from what GMPics said, in
 23 that GMPics said he was charged with conspiracy, whereas
 24 this says he is charged with armed robbery?
 25 **A. Sorry? It says that he has been charged in the past,**

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<p>1 which is an armed robbery.</p> <p>2 Q. Yes, and that is different, isn't it, to what GMPics</p> <p>3 said?</p> <p>4 A. Well, it is conspiracy to rob encompassing an armed</p> <p>5 robbery.</p> <p>6 Q. Conspiracy is importantly different to armed robbery,</p> <p>7 especially in the context of briefing firearms officers,</p> <p>8 isn't it?</p> <p>9 A. Well, I wouldn't say so, sir. If somebody is charged</p> <p>10 with a conspiracy to rob, whether they are charged with</p> <p>11 the single offence, I wouldn't say it is hugely</p> <p>12 different, sir.</p> <p>13 Q. But the armed robbery indicates the defendant was</p> <p>14 actually using a weapon, whereas --</p> <p>15 A. There was a weapon presented during the course of that</p> <p>16 robbery.</p> <p>17 Q. Yes, and the fact that it was armed robbery indicates</p> <p>18 that the defendant was using the weapon, whereas</p> <p>19 conspiracy doesn't.</p> <p>20 A. I would disagree with you in terms of the actual wording</p> <p>21 of a conspiracy to rob, whatever that person -- whatever</p> <p>22 the role they played within that robbery, there was</p> <p>23 enough to charge, as outlined on the crime, with</p> <p>24 a conspiracy to rob encompassing that particular</p> <p>25 robbery.</p> <p style="text-align: center;">Page 93</p>	<p>1 A. Yes.</p> <p>2 THE CHAIRMAN: I do apologise Mr Straw, but could I have</p> <p>3 that page reference again?</p> <p>4 MR STRAW: Of course, 929.</p> <p>5 THE CHAIRMAN: 929.</p> <p>6 (Pause)</p> <p>7 Yes.</p> <p>8 MR STRAW: This is just to show you what it is, the events</p> <p>9 log for Operation Shire; do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. Within that, please, to page 941.</p> <p>12 A. Yes.</p> <p>13 Q. The middle entry, timed 4.59 --</p> <p>14 A. Yes.</p> <p>15 Q. -- about three lines down, at the end of the line, it</p> <p>16 said:</p> <p>17 "The BMW was driven via the A34 towards Stoke. The</p> <p>18 Audi was driven M62, M6 and the A500 also towards Stoke.</p> <p>19 The driver of the BMW was the same man as yesterday."</p> <p>20 And then here:</p> <p>21 "05.35 hours, update supplied by employers' footage</p> <p>22 from the move off of the Audi this morning shows a very</p> <p>23 large monkey wrench and two petrol cans being loaded</p> <p>24 into the Audi."</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 95</p>
<p>1 Q. I just have a few --</p> <p>2 THE CHAIRMAN: How long do you think you will be, Mr Straw?</p> <p>3 I am happy to let you finish if it is just going to be</p> <p>4 a few minutes, otherwise we should break off.</p> <p>5 MR STRAW: If I could start after lunch, I would be</p> <p>6 grateful.</p> <p>7 THE CHAIRMAN: All right, 2.10.</p> <p>8 (1.05 pm)</p> <p>9 (The Luncheon Adjournment)</p> <p>10 (2.10 pm)</p> <p>11 THE CHAIRMAN: Yes, Mr Straw.</p> <p>12 MR STRAW: Thank you. Just a few short points.</p> <p>13 On 26 January 2012 --</p> <p>14 THE CHAIRMAN: 25th or 26th?</p> <p>15 MR STRAW: 26th.</p> <p>16 THE CHAIRMAN: 26th.</p> <p>17 MR STRAW: Were two petrol cans and a monkey wrench seen in</p> <p>18 the red Audi?</p> <p>19 A. I think there was certainly two petrol cans seen. I am</p> <p>20 not sure if that was the date, actually.</p> <p>21 Q. Let me take you to the reference.</p> <p>22 A. Yes.</p> <p>23 Q. Bundle K, please.</p> <p>24 A. Page number, please.</p> <p>25 Q. Start at 929, please.</p> <p style="text-align: center;">Page 94</p>	<p>1 Q. Just to try and unpick that, please, "Updates supplied</p> <p>2 by employers' footage"; is it right that this came from</p> <p>3 some form of footage that the employers had supplied, or</p> <p>4 had viewed?</p> <p>5 A. The -- from within the Operation Shire team.</p> <p>6 Q. So it was the employers looking at footage, was it, and</p> <p>7 then passing you this information?</p> <p>8 A. Sorry, the employers referred to here is my team. So we</p> <p>9 are classed as the employers to the dedicated</p> <p>10 surveillance unit, so they are doing work for us, so we</p> <p>11 are their employers.</p> <p>12 Q. Thank you.</p> <p>13 Were the monkey wrench and two petrol cans seen in</p> <p>14 the red Audi at any other time after 26 January?</p> <p>15 A. Not that I recall.</p> <p>16 Q. No, and there is no entry anywhere on the surveillance</p> <p>17 records, that would indicate, wouldn't it, that it was</p> <p>18 not seen after 26 January?</p> <p>19 A. Yes, not that I am aware of.</p> <p>20 Q. Anthony Grainger worked in a scrapyards as a vehicle</p> <p>21 recovery driver. Is there anything unusual or</p> <p>22 surprising about him having a monkey wrench and two</p> <p>23 petrol cans in that context?</p> <p>24 A. Not in that context, no.</p> <p>25 Q. A similar issue: was a black leather sheath seen in the</p> <p style="text-align: center;">Page 96</p>

1 back of the red Audi on the 31 January 2016?
 2 **A. Yes, I believe it was.**
 3 Q. But it was not possible, was it, to see whether there
 4 was anything in it?
 5 **A. No, it wasn't.**
 6 Q. After that date, 31 January, it wasn't seen again, in
 7 the red Audi?
 8 **A. That's correct.**
 9 Q. The memory stick, or pen drive, do you know what I am
 10 referring to?
 11 **A. I do, yes.**
 12 Q. Is it right that searches of a property connected to
 13 Anthony Grainger were carried out after his death and
 14 you were asked to include within the search to look for
 15 the memory stick?
 16 **A. That's correct.**
 17 Q. Can you tell us who asked you to do that?
 18 **A. I would have to look in my book. I think it was a DI**
 19 **that actually asked me to do it, but I know that I made**
 20 **an entry at the time.**
 21 Q. Did that DI have any connection with Operation Shire
 22 before that?
 23 **A. No.**
 24 Q. Could you have a look, please, at bundle I.
 25 THE CHAIRMAN: Page?

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1 **A. What page?**
 2 MR STRAW: Just before I come to the page -- sorry, to allow
 3 you to find the folder, it is 1096.
 4 **A. Thank you.**
 5 Q. 1095, sorry.
 6 THE CHAIRMAN: Yes.
 7 MR STRAW: So page 1095. Were you aware that after
 8 Anthony's shooting, some information was received which
 9 suggested that weapons may have been stored near to the
 10 red Audi at the scene of the shooting, but not in it?
 11 Are you aware of that sort of information?
 12 **A. I am not aware of the source of the information.**
 13 Q. Let's have a look specifically, please, at the bottom of
 14 1095.
 15 MR BEER: I think Mr Straw said, "That sort of information",
 16 not "the source".
 17 **A. Sorry, I thought you said "source".**
 18 MR BEER: Mr Straw would not be asking what the source was.
 19 MR STRAW: No, I wouldn't.
 20 **A. Sorry, what was it, 1095?**
 21 THE CHAIRMAN: 1095 was the reference I was given. This is
 22 in bundle I; is that right?
 23 MR STRAW: That's right, yes. This part of the defence case
 24 statement in the Fahy prosecution. At the bottom of the
 25 page, paragraph 11.15, it says this:

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1 "Although subsequent to the decision-making process
 2 on the day, GMP is now aware of two further pieces of
 3 intelligence which support the belief that David Totton
 4 and Anthony Grainger were likely to have been in
 5 possession of the firearms/weapons. That includes the
 6 information received by GMP in a letter which was
 7 subsequently passed to the IPCC in which it was stated
 8 that, although there are no firearms in the stolen red
 9 Audi when Anthony Grainger was shot, there had been
 10 shortly before.
 11 "In addition to this, the CPS has recently disclosed
 12 there is hearsay information that, prior to the arrival
 13 of the stolen red Audi containing Anthony Grainger,
 14 David Totton and Joseph Travers in the car park in
 15 Culcheth, an accomplice had placed an imitation firearm
 16 and a machete in the rubbish bin nearby for use by the
 17 three men in the course of a planned robbery."
 18 Had you been made aware of that information?
 19 THE CHAIRMAN: When? You say, "Had he been made aware of
 20 that information", when are you asking?
 21 MR STRAW: Yes, well, let's start after the shooting.
 22 **A. Yes, I believe there was some intelligence received**
 23 **after -- after the shooting.**
 24 Q. Was any intelligence to that effect received before the
 25 shooting?

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1 **A. No.**
 2 Q. It says there that there were two pieces of
 3 intelligence; was one of the pieces of intelligence in
 4 a letter?
 5 **A. I don't know, sir.**
 6 Q. You don't know. Are you able to tell us whether the
 7 name of the person supplying the information was in the
 8 letter?
 9 MR BEER: If he doesn't know whether it was supplied in
 10 a letter --
 11 THE CHAIRMAN: He cannot answer that question.
 12 MR BEER: He is not going to answer that question.
 13 THE CHAIRMAN: Yes.
 14 MR STRAW: The broader question: do you know anything about
 15 the name or reliability of the source of the
 16 information?
 17 **A. Sorry, sir, no.**
 18 Q. No.
 19 It is suggested there that there was hearsay
 20 information; do you know anything about the reliability
 21 of how the information was communicated to GMP?
 22 **A. I don't know, sir.**
 23 Q. You are not able to tell us whether it was reliable or
 24 not reliable?
 25 **A. For the intelligence?**

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1 Q. The source of this information, are you able to tell us
 2 anything about the reliability --
 3 **A. If I could see the intelligence log, then I would be**
 4 **able to tell you what the grading is.**
 5 Q. Okay, let's try and turn to that.
 6 I hope this will be the last bundle, bundle C,
 7 please.
 8 **A. Sorry, have you got a page number, sir?**
 9 Q. 824.
 10 THE CHAIRMAN: I need to find that one.
 11 MR STRAW: Bundle C, on page 824.
 12 THE CHAIRMAN: I can't lay my hands on that particular file
 13 at the moment. It is not one of the eight that
 14 I currently have open in front of me, Mr Straw.
 15 You carry on and I will do my best.
 16 MR STRAW: If that is easier, sir, it is a very short entry.
 17 At the bottom of that page -- do you have that, officer?
 18 **A. Yes.**
 19 Q. The bottom of page 824, this is the only other reference
 20 we have been able to find to this. Sorry, it is three
 21 entries up:
 22 "Suggested form of words: GMP hold intelligence that
 23 suggests that on the night of the shooting of
 24 Anthony Grainger, in addition to the vehicle being used
 25 by those arrested, there was a further vehicle which

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1 contained weapons and balaclavas."
 2 Do you see that, there?
 3 **A. Yes.**
 4 Q. Again, this was received, am I right, after the
 5 shooting; it was not before the shooting?
 6 **A. No, it was after.**
 7 Q. After.
 8 Can you see that it is inconsistent with the other
 9 piece of intelligence that we just had, in that here it
 10 says that, "The vehicle contained weapons and
 11 balaclavas", whereas previously, the entry we saw said
 12 there was, "An imitation firearm and machete" involved;
 13 yes?
 14 **A. Hmm.**
 15 Q. In addition, the last entry we saw said these items were
 16 found in a bin, whereas this item says they were placed
 17 in a vehicle.
 18 **A. Yes, they may be from different intelligence sources,**
 19 **sir. I don't know.**
 20 Q. Would those sort of conflicts in the key bits of
 21 information tell you anything about its reliability?
 22 **A. Not if it was from two different people it wouldn't.**
 23 Q. Well, if they were talking about the same thing, would
 24 it not indicate that what they were saying was not
 25 reliable?

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1 **A. No.**
 2 THE CHAIRMAN: I am just struggling a little bit at the
 3 moment, Mr Straw, to understand how an inquiry into the
 4 reliability of intelligence, which it appears to be
 5 common ground was not received until after the event, is
 6 going to help the inquiry?
 7 MR STRAW: Yes, there might have been a suggestion that this
 8 was accurate, sir, and that it might be relevant to
 9 whether there were in fact weapons at the scene.
 10 THE CHAIRMAN: Right.
 11 MR STRAW: I think, well -- and just to be completely clear:
 12 is it right that you can't help us as to whether this
 13 information was considered to be reliable or unreliable?
 14 **A. Sorry, I can't help you because I do not have the**
 15 **intelligence rating, sir.**
 16 Q. Thank you.
 17 Was any firearm or weapon found in the vicinity of
 18 the red Audi after the shooting?
 19 **A. Not that I am aware of, sir.**
 20 Q. You would have been made aware of it if it had happened?
 21 **A. Yes.**
 22 Q. Final issue. It is right, isn't it, that Mr Totton and
 23 Mr Travers were found with balaclavas rolled up on their
 24 heads?
 25 **A. Yes.**

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1 Q. But in Mr Grainger's case, he didn't have a balaclava on
 2 his head?
 3 **A. That is correct.**
 4 Q. Correct. But a bob hat was found in the footwell on the
 5 driver's side?
 6 **A. That's correct.**
 7 MR STRAW: That is everything. Thank you very much.
 8 **A. Thank you.**
 9 **Questions from MR WEATHERBY**
 10 **MR WEATHERBY: Thank you. I have four short areas,**
 11 **Mr Cousen. I hope I will not be very long.**
 12 **First of all, can I just deal with the position at**
 13 **the car park and just pick up a couple of threads that**
 14 **Mr Beer was asking you about.**
 15 **A. Yes.**
 16 Q. You were being asked questions about the fact that eyes
 17 were lost on the car; yes?
 18 **A. Yes.**
 19 Q. You mentioned the tracking device?
 20 **A. Yes.**
 21 Q. It is right, I think, that the tracking device will tell
 22 you where the car is.
 23 **A. Yes.**
 24 Q. But it will not tell you who is in it.
 25 **A. No, that's correct.**

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<p>1 Q. So it is clear that that is an aid to telling you where 2 the car is, as you are following the operation -- 3 A. Yes. 4 Q. -- between 6.30 and approximately 7.15, on the night in 5 question. 6 A. Yes. 7 Q. So that doesn't help us with eyes on or eyes off; is 8 that fair? 9 A. That is fair, yes. 10 Q. Yes. You then mentioned that you were aware of the 11 surveillance assets being in the area? 12 A. Yes. 13 Q. Of course, that means primarily the DSU? 14 A. Yes. 15 Q. I am not going to go into it because obviously that 16 would not be appropriate, but we have heard evidence in 17 effect that they have a net around anybody that they are 18 surveying, and the aim is that eyes are kept on that 19 person and it either works or it doesn't; yes? 20 A. Yes. 21 Q. Now, we know the reason you were being asked about that 22 is in fact eyes were lost on the car. 23 A. During the travelling or -- sorry, whilst it is in the 24 car park? 25 Q. During the period I was referring to; yes?</p> <p style="text-align: center;">Page 105</p>	<p>1 THE CHAIRMAN: I am being a bit pedantic here, when you say 2 "entry and egress points", you mean to the car park 3 itself? 4 A. To the car park, yes. 5 MR WEATHERBY: Yes, certainly I was going in that direction, 6 as well. You may know that they are in the general 7 area, but you cannot possibly know, can you, where they 8 have eyes on? 9 A. Well, yes, because we can see where they are located. 10 From the mapping system that we use -- 11 Q. Yes, and I don't want to go into that. I understand 12 what you are saying, you have a good idea where the 13 assets are dotted around. 14 A. Clearly, there is quite a number of people there and 15 I don't know specifically what they are looking at 16 but -- 17 Q. Well, that is my point. 18 A. But the point of them plotting where they plot is to 19 make sure that, at any point, when the subjects, if they 20 were to have got out of the vehicle and walked out to 21 the row of shops, to the pub, et cetera, would be to 22 make sure that wherever they position themselves, that 23 they pick that up. 24 In other words, it's in -- the car park is fairly 25 confined, so they haven't got eyes on the car park, but</p> <p style="text-align: center;">Page 107</p>
<p>1 A. Yes. 2 Q. Just again to put it in a bit of context for you, the 3 evidence from the DSU officers was that, looking at the 4 log, it appears that they had eyes on the vehicle right 5 up until 18.52. The reason for that is that they would 6 have expected an entry "Eyes lost" otherwise; yes? 7 A. Yes. 8 Q. So I am certainly not going to take any issue with eyes 9 being lost until 18.52. 10 A. Okay. 11 Q. So this is what I want to ask you about, really: at the 12 point where eyes are lost -- 13 A. Yes. 14 Q. -- you have no idea what is going on at that car? You 15 are in the command room, and you don't know what is 16 going on in that car? 17 A. No, that is -- I think that is fair. 18 Q. You referred to surveillance assets being in the area 19 but, effectively, that is all you know, that they are in 20 the general environs but they haven't eyes on? 21 A. They haven't got eyes on, but I think I tried to explain 22 it that any entry or egress points are being covered -- 23 you are right, they have not got eyes on the actual 24 vehicle, but they have certainly any access routes in 25 and out, on foot or in vehicle --</p> <p style="text-align: center;">Page 106</p>	<p>1 what they have got eyes on is anything coming in or 2 anything coming out. So if they leave the vehicle -- 3 Q. Well, you say that, and that is why I ask you the 4 question, but it is right, isn't it, that sat in that 5 command room, you are expecting them to have eyes on the 6 car; that is their purpose? 7 A. Which is why I asked for an officer to make sure, 8 I asked the blue liaison to make sure. 9 Q. Yes, but although you have an idea of where the assets 10 are, you cannot see their lines of sight? 11 A. No, I can't possibly, can I, see. 12 Q. So you cannot actually tell us -- 13 A. No, but you are talking about really trained, skilled 14 members of staff here who know exactly what they are 15 doing and what they need to be looking for. 16 Q. Yes, I am sure they are all doing their best, but the 17 fact that they lose eyes on this operation, on this car, 18 for such a long period of time, shows, frankly, how 19 difficult it is, doesn't it? 20 A. It is a difficult job. There is no doubt about that. 21 Q. Yes. So although you would hope that if they haven't 22 eyes on the subjects, they have eyes on all of the entry 23 and egress points, you could not possibly know, at 24 18.52, in that command room, could you? 25 A. I was satisfied based on my own experience, based on the</p> <p style="text-align: center;">Page 108</p>

1 **experience of the DI who is in the room with me, based**
 2 **on the mapping system, based on the VTD and based on the**
 3 **fact that I had not had any information to say that the**
 4 **either the vehicle had moved or that any of the**
 5 **surrounding DSU operatives had sighted any of the**
 6 **subjects leaving the vehicle.**
 7 Q. Okay, well, I have made my point. I will move on from
 8 that.
 9 The fact is that from 18.52, for the next 13
 10 minutes, the men in the car, if they were up to what you
 11 believed they were up to, they could have been doing any
 12 number of things which would have increased the risk; is
 13 that right?
 14 **A. In regards to what?**
 15 Q. Well, take it away from this case, in any situation like
 16 this, where you think there is a potential robbery about
 17 to go ahead, and you have a car with the possible
 18 robbers in it, possibly armed, they could be loading
 19 their weapons, pulling their weapons, drawing their
 20 weapons, loading them up, getting ready to get out of
 21 the car. That is one possibility, isn't it?
 22 **A. As you said, there's a number of possibilities.**
 23 Q. Another possibility is that they could be getting --
 24 again I am not talking about this case -- but they could
 25 be getting weapons that had been left in a bag on the

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1 car park.
 2 **A. There is a number of possibilities that you can be**
 3 **raising, sir, but, as I have said, I was satisfied, as**
 4 **much as I could be, without getting the eyes back on to**
 5 **it, that the subjects were controlled as best they could**
 6 **be without having the eyes on.**
 7 Q. "Controlled as well as they could be without having eyes
 8 on"?
 9 **A. Yes.**
 10 Q. Yes?
 11 **A. Yes, because they had a number of different -- I have**
 12 **just gone through it a number of times, haven't I?**
 13 Q. Yes, they could have got out of that car and got into
 14 another car.
 15 **A. But they didn't do, sir.**
 16 Q. I am aware of that, Mr Cousen, but that is another
 17 possibility, isn't it?
 18 **A. But that was my professional opinion based on having the**
 19 **detective inspector with me, as well, from the DSU,**
 20 **based on my professional experience and based on what**
 21 **was happening on the ground, as well, and it was proved**
 22 **to be correct.**
 23 Q. At 18.45, the car drives on to the car park and parks
 24 up, doesn't it?
 25 **A. Yes.**

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1 Q. I can give you the reference, if that is in dispute.
 2 **A. No, that is fine.**
 3 Q. You would know that from the VTD, and you would also
 4 know that from the DSU because they had eyes on at that
 5 point. So in the command post, in the command room, you
 6 would know that that had happened. Can you explain to
 7 us what was happening in that command room for the next
 8 seven minutes?
 9 **A. I had spoken to the team leader, to DI Hughes, in**
 10 **relation -- that I wanted to have somebody back with --**
 11 **we had -- there had been a surveillance operative who**
 12 **was what we would call "ahead and waiting". So once the**
 13 **vehicle started moving, one of the operatives had**
 14 **already gone ahead to get themselves a good position.**
 15 **He has already given evidence. Then, for whatever**
 16 **reason, that officer felt like they couldn't then**
 17 **maintain those observations. So once I was aware of**
 18 **that, I had asked then that we could put somebody -- can**
 19 **we get back with eyes on.**
 20 Q. Right, can I just put the question again. It is very
 21 difficult I know, but the question is: the car drives on
 22 at 18.45, and then for seven minutes you have eyes on.
 23 You have Mr Wallace and the DSU with eyes on the car.
 24 That is the period I am talking about at the moment;
 25 okay?

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1 **A. Okay.**
 2 Q. So during that seven-minute period, a very long period
 3 of time in the context of what is going on, what is it
 4 that is going on in that command room?
 5 **A. I can't remember, I don't know if at that point --**
 6 **I don't know if that is when Mr Granby had asked for the**
 7 **firearms teams to move up. I can't honestly remember**
 8 **what the conversation was.**
 9 Q. Okay, well, we will ask Mr Granby when he comes --
 10 **A. Yes.**
 11 Q. -- about that.
 12 But can you recall what was happening during that
 13 period, or are you just surmising?
 14 **A. I can't recall.**
 15 Q. Because, by this point, you are way beyond the tipping
 16 points, or certainly the first of the tipping points,
 17 having been met, aren't you?
 18 **A. Well, obviously, we discussed these earlier on, yes.**
 19 Q. Yes. So, I mean, by the time the car goes on the car
 20 park you are 15 minutes, effectively, past the first
 21 tipping point being met.
 22 **A. Yes, I agree with that.**
 23 Q. You would agree with that?
 24 **A. Yes.**
 25 Q. But 15 minutes, then plus the seven minutes that I have

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1 already alluded to, so that is 22 minutes. Have you
 2 turned round to Mr Granby and said, "Well, so far as my
 3 role is concerned, as SIO, the tipping point has passed
 4 and therefore I am content for there to be an arrest?"
 5 **A. That is clearly -- it is going to have been discussed at**
 6 **that point. Now, whether that is at the point when the**
 7 **officer then has to -- they feel like they have been or**
 8 **potentially could get compromised, I can't say.**
 9 **All I know is that the DSU operative had to move**
 10 **off. Perhaps we would have gone to State Amber sooner**
 11 **had that transmission not come across. I can't answer**
 12 **that question now. But you are quite correct, we got to**
 13 **the position where, from my perspective, once we were in**
 14 **that area, then, yes, certainly.**
 15 Q. I don't suspect you have ever been involved in another
 16 incident where somebody has been shot, have you?
 17 **A. No.**
 18 Q. So is it really that difficult to remember when you
 19 turned to the tactical firearms commander and said that
 20 evidentially the tipping point has been passed?
 21 **A. Sorry, sir, but it is five years ago and I am trying to**
 22 **assist the court as best I can in terms of -- you know,**
 23 **I have been trying to remember going back to right at**
 24 **the start of the operation, September, October time and**
 25 **it is very difficult.**

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1 **You are right, it is something that I am not going**
 2 **to forget ever, but I am trying to -- I have tried to**
 3 **remember as much as I possibly can do. I have tried to**
 4 **assist the Inquiry as much as I possibly can do.**
 5 Q. At 18.52, we know that Mr Wallace thought that his
 6 position was compromised, or potentially compromised,
 7 and he moved off.
 8 **A. Yes.**
 9 Q. In fact, what Mr Wallace said was that he had reported
 10 back that he was in an operationally vulnerable
 11 position -- I am not sure what the right term would be,
 12 but you know what I mean.
 13 **A. Yes.**
 14 Q. Before 52 with a view to being replaced; do you recall
 15 that?
 16 **A. I don't remember that. He may have rang direct to**
 17 **DI Hughes, he may have shouted up off the radio.**
 18 **I don't remember it.**
 19 Q. Logically, it would have been over the DSU feed that you
 20 were listening to.
 21 **A. That might have been a cover in terms of using his**
 22 **phone. He might have been using that as a cover.**
 23 **I don't know.**
 24 Q. From then on, in the next 13 minutes, what is happening
 25 in the command room?

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1 **A. Once he has to leave?**
 2 Q. Once he leaves, you are in the command room with
 3 Mr Granby --
 4 **A. Yes.**
 5 Q. -- and you have this operation where you are way past
 6 the tipping point.
 7 **A. Yes.**
 8 Q. And, on your account, you have intelligence of
 9 a potential robbery --
 10 **A. This is when I am -- sorry, I tried to explain earlier.**
 11 **This is when I am saying to DI Hughes about having --**
 12 **getting eyes back on the vehicle, because once we can**
 13 **get eyes back on the vehicle, that is when we are going**
 14 **to be going to State Amber.**
 15 Q. Yes, something has gone seriously wrong, hasn't it?
 16 **A. I would not say it has gone seriously wrong. On these**
 17 **types of operations, these types of things happen all**
 18 **the time. You can be on the back of subjects, when you**
 19 **have got absolutely no idea that they are about to**
 20 **commit -- and this is from personal experience, where**
 21 **you have got no intelligence, nothing to suggest that**
 22 **a robbery is going to occur or they are going to be**
 23 **planning to -- and all of a sudden events unfold in**
 24 **front of you.**
 25 Q. Let me take it clear, I am not saying anything other

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1 than these things happen. Of course, surveillance is
 2 very difficult and eyes are lost, but you would know
 3 that in advance of this operation, wouldn't you?
 4 **A. What, that eyes were going to be lost?**
 5 Q. That potentially they would be lost.
 6 **A. Of course, and that's what the team are trained for.**
 7 Q. That is what I am asking the questions about, really,
 8 that the tipping point had been passed, so why not --
 9 the clear assertion, the tipping point has been passed,
 10 we can move to arrest mode now --
 11 **A. Those discussions would have been taking place. Like**
 12 **I said, whatever point we had been made aware that the**
 13 **DSU operative has had to move away -- and I don't know**
 14 **what time that was -- but then it is about getting eyes**
 15 **back on to the area as fast as --**
 16 Q. As I understand the evidence -- and I will be corrected
 17 if I am wrong -- the move to amber is at 19.05, 35 --
 18 MR BEER: 19.03.
 19 **A. I think it is 19.03, sir. As soon as we get the call,**
 20 **at 19.03, that there are people within the vehicle, the**
 21 **State Amber is then called.**
 22 **MR WEATHERBY: I said I would be corrected if I was wrong**
 23 **and I have been, and I apologise for that. 19.03, it**
 24 **doesn't really matter.**
 25 **But 11 minutes on, before eyes had been**

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1 re-established on the car, amber is called.
 2 **A. Yes.**
 3 Q. Can you explain what was going on in the command room as
 4 to why the move to the arrest mode had taken 33 minutes?
 5 **A. Sir, I have just tried to explain that to you.**
 6 **Yes, there was eyes on. I don't know what time the**
 7 **call came to say, "Look, I am not going to be able to**
 8 **stay here long", whether that was over the radio,**
 9 **whether it was over the telephone but whether or not we**
 10 **were then about to go to State Amber and that has**
 11 **happened. I don't know, I can't honestly remember.**
 12 **All I do know is that once eyes were lost, I had**
 13 **asked that as soon as possible if we could get eyes back**
 14 **on.**
 15 Q. Yes, is it right that the fact that because eyes were
 16 lost at 18.52, in context of this, it was a very
 17 stressful room at that point?
 18 **A. Any kind of arrest situation, any kind of situation**
 19 **where you have got a surveillance team out with**
 20 **an arrest capability on, when you get to these**
 21 **scenarios, then, yes, the adrenalin is definitely**
 22 **running.**
 23 Q. Yes, the point I am making here, Mr Cousen, is: the
 24 longer you leave it, the more there is to go wrong, and
 25 the fact is that the risk goes up, doesn't it?

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1 **A. The worry is that the robbery takes place, and the last**
 2 **thing that we wanted to happen was for people to be put**
 3 **at risk. So, yes, in that regard, I agree with you.**
 4 Q. Looking back at it, one more question before I move on,
 5 why not, at 18.33 or 18.35 or 18.40, why not turn to
 6 Mr Granby and say, "Well, obviously the tipping points
 7 have passed"?
 8 **A. As I have said, the tipping points are always flexible.**
 9 **That is always a kind of professional discussion between**
 10 **myself and Mr Granby. It is also down to what the**
 11 **capabilities are of the surveillance unit. You have**
 12 **alluded to it yourself. They was running on a technical**
 13 **with clippings, of sightings of the vehicle, so we**
 14 **clearly need to have control of it. And I think we have**
 15 **mentioned it earlier, as well, we was also talking about**
 16 **a very high performance vehicle, as well. These would**
 17 **have all been considerations.**
 18 Q. You set up a tipping point for a reason, don't you?
 19 **A. You set up a tipping point for a reason but, like**
 20 **I said, there is always flexibility around it.**
 21 Q. I am not saying there is not flexibility, Mr Cousen, but
 22 you set up a tipping point which is effectively passed
 23 at 18.30.
 24 **A. And within 45 minutes --**
 25 Q. Yes, 45 minutes where eyes are lost.

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1 **A. No, within 45 minutes -- or less than that, sorry, just**
 2 **over half an hour, we have gone to State Amber.**
 3 Q. Yes, and that is swift, is it?
 4 **A. It is not unusual, let's put it that way.**
 5 Q. In the context here, though, it leads to a position
 6 where the risk factors have gone up in a straight line,
 7 haven't they?
 8 **A. I would disagree with you, sir.**
 9 Q. I will move on.
 10 The second topic, and it will be quicker, I want to
 11 ask you about CROPS. What does CROPS stand for?
 12 **A. I think it is Covert Rural Operational Police Support,**
 13 **I can't remember. It is a specially trained**
 14 **surveillance officer.**
 15 Q. I hope I don't have to take you to the documents, but
 16 I am happy to do so if we get stuck. But on the
 17 briefing, the firearms briefing with Mr Lawler, on the
 18 2nd --
 19 **A. Yes.**
 20 Q. -- there are CROPS officers deployed.
 21 **A. Yes.**
 22 Q. Can you help us with what they were doing on the 2nd?
 23 In general terms.
 24 **A. No -- well, I don't know. They was certainly deployed.**
 25 **I think it was in relation to getting close into where**

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1 **the banks and building societies are, because they are**
 2 **specially trained to kind of hide.**
 3 Q. Yes. So they are an additional level of surveillance
 4 feeding back to the command room?
 5 **A. Yes. It was -- yes, I think it was specifically to get**
 6 **near to where the banks were.**
 7 Q. And, on the 3rd, it appears from Mr Granby's briefing,
 8 that CROPS were not deployed on the 3rd.
 9 **A. Yes.**
 10 Q. Why was that?
 11 **A. I don't know. That is a tactical decision. That is**
 12 **something that the TAC and the TFC would discuss in**
 13 **terms of whether they're needed or whether they are not**
 14 **needed.**
 15 Q. So that is more on the firearms side? It is not
 16 connected to the DSU and the FRU involvement?
 17 **A. No. It is not FRU. The staff do come from the DSU, but**
 18 **that is a specific deployment.**
 19 Q. Yes, but you would see where I am headed with this
 20 question, that on the 2nd, we have heard this morning,
 21 and I am not going to go over it but, we have heard from
 22 Mr Beer's questioning of you, the plan was to intercept
 23 before getting to Culcheth; yes?
 24 **A. On the 1st? Sorry, you said --**
 25 Q. In the small hours of the 2nd, yes.

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1 **A. Sorry.**
 2 Q. Even though that was the plan, there was this extra
 3 layer of surveillance involved.
 4 **A. Yes, I think it was --**
 5 Q. Extra safeguard involved; yes?
 6 **A. Well, no, sorry, the CROPS officers are CROPS officers**
 7 **within the surveillance team. So they are always**
 8 **present, it is just that on that particular deployment,**
 9 **on the 1st going into the 2nd, the CROPS officer, as**
 10 **I understand it, was given a firearms authority. That**
 11 **was the difference between the deployment on the 2nd and**
 12 **the deployment on the 3rd.**
 13 **There will always be CROPS officers within your**
 14 **surveillance team, it is just that on that particular**
 15 **occasion they would have been mentioned because they had**
 16 **specifically been given a firearms authority. That**
 17 **is -- this is the only time I have ever known a CROPS**
 18 **officer to be given a firearms authority.**
 19 Q. Right, okay. I will take that up with Mr Granby, but
 20 I just want to progress this slightly further. What
 21 I am exploring with you is that the deployment of the
 22 CROPS on the small hours of 2 March --
 23 **A. The firearms crops.**
 24 Q. An extra safeguard in terms of the operation.
 25 **A. It was from a firearms operation perspective, yes.**

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1 Q. Yes. I will pursue that with Mr Granby.
 2 **A. Okay.**
 3 Q. Again, just coming back on the tipping point, so I have
 4 properly understood this, on the tipping points that you
 5 agreed with Mr Lawler, the plan was to, in effect, the
 6 wish was to stop the car getting to Culcheth; yes?
 7 **A. Yes.**
 8 Q. That was in the context where what your belief was that
 9 they were potentially going to do a lie in wait robbery.
 10 **A. Yes.**
 11 Q. In the small hours of the night.
 12 **A. Yes.**
 13 Q. So in that context, the tipping point is set and the
 14 plan behind it is that the safest option is to arrest
 15 the subjects once they are in the car on the way to
 16 Culcheth; yes?
 17 **A. Before they get into a financial institution, yes.**
 18 Q. Yes. Then, on the 3rd, the tipping point remains very
 19 low. Again, I am not going to go over it, you were
 20 questioned by Mr Beer about this. But your belief on
 21 the 3rd was that there was at least a possibility of
 22 an actual robbery being committed, and by the time you
 23 get to 6.00, at a time of day when there are people
 24 going out, when you would expect people to be on the
 25 street; yes?

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1 **A. Yes. Yes.**
 2 Q. So, potentially, a much greater risk in Culcheth than
 3 before Culcheth; is that fair?
 4 **A. Yes.**
 5 Q. Can you help with that, at all, why the plan on the 2nd
 6 was to intercept before going into Culcheth or --
 7 **A. I think -- and this is me trying to remember it,**
 8 **I couldn't remember why the tipping points were set as**
 9 **they were. It may have been something to do with this**
 10 **not wanting to get into a siege-type situation.**
 11 THE CHAIRMAN: You are now talking about the 2nd?
 12 **A. Yes, sorry, the 2nd.**
 13 **MR WEATHERBY: I follow that. I am not quibbling with the**
 14 **plan there, but the plan on the more dangerous**
 15 **operation, if you like, the 3rd, is not aimed at**
 16 **stopping the car before it gets to Culcheth. It seems**
 17 **the wrong way round.**
 18 **A. It is the plan that was developed at the time the**
 19 **tipping points, obviously, were agreed.**
 20 Q. Yes, it was. I am just exploring with you as to why it
 21 would appear that the plan was safer on the 2nd than it
 22 was on the 3rd?
 23 **A. It was a completely different operation, wasn't it? It**
 24 **was a completely different deployment. It was deemed**
 25 **that that was the safest tactic to do.**

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1 **Again, we are kind of talking here in relation to**
 2 **the tactical options: what are the best options?**
 3 Q. To be fair to you, this is material that should be
 4 developed with Mr Granby --
 5 **A. Yes.**
 6 Q. -- and Mr Lawler, no doubt.
 7 But the reason I am going there with you is because
 8 you are involved in the decision over the tipping
 9 points.
 10 **A. I am involved in it.**
 11 Q. Yes, so believe me, I will, with the Chair's permission,
 12 ask Mr Lawler and Mr Granby, as well. But, in terms of
 13 the 2nd, knowing what the plan was, then, if the
 14 subjects had gone to the car, you would have been very
 15 keen to say to Mr Lawler, "Right, they are in the car,
 16 on their way to Culcheth, as far as the operation, the
 17 criminal investigation is involved, we have reached the
 18 tipping point, so over to you to arrest", and you would
 19 be keen to do that as soon as possible, wouldn't you?
 20 **A. I would probably argue not because I would -- we would**
 21 **still be in a very similar -- yes, we are making sure we**
 22 **don't get to that situation in terms of getting to the**
 23 **financial institution, but we would still be making**
 24 **an assessment, in terms of: is a vehicle just being**
 25 **moved? Those considerations would still be going on,**

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1 so --
 2 Q. Okay?
 3 **A. It didn't happen, so we are talking hypothetically.**
 4 Q. Well, I follow that.
 5 **A. Ultimately, whatever I asked for, it might be that the**
 6 **TFC doesn't agree with that anyway and that --**
 7 Q. No.
 8 **A. -- the arrest is going to be carried out anyway.**
 9 Q. No, the process is that your input here is that you know
 10 best about the criminal investigation hurdle; yes?
 11 **A. Yes.**
 12 Q. So your role in this part of it is to say to the TFC,
 13 "As far as the investigation is concerned, we would like
 14 you to arrest", and then they take over and deal with
 15 when or if to arrest; yes?
 16 **A. Yes.**
 17 Q. The point I am exploring with you again is that, on the
 18 2nd, you know the plan is to do that before Culcheth?
 19 **A. Yes, but I would have still potentially been saying the**
 20 **same -- again, I am talking hypothetically, but I may**
 21 **still have been having the same conversation with**
 22 **Mr Lawler, to say, "Can we just see what is happening?"**
 23 **and then moving the vehicle.**
 24 THE CHAIRMAN: You would not have automatically moved to
 25 arrest.

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1 **A. No. No.**
 2 **MR WEATHERBY: Yes.**
 3 THE CHAIRMAN: I think we have covered this now, pretty
 4 thoroughly now, Mr Weatherby.
 5 MR WEATHERBY: Yes, I will move on.
 6 Finally, can I move to your notes, please. For this
 7 we will need to just go back to your casebook, and
 8 I just want to ask you about the two pages which deal
 9 with the 3rd.
 10 THE CHAIRMAN: This is F, isn't it, I think?
 11 MR WEATHERBY: Yes, F. It is tab 16 -- no, it isn't.
 12 **A. 16?**
 13 Q. It is 1246. It's not tab 16, it is your casebook.
 14 THE CHAIRMAN: F? K, is it? Sorry, my fault.
 15 MR WEATHERBY: 1248.
 16 **A. Yes.**
 17 THE CHAIRMAN: I have it out somewhere.
 18 Carry on, I will be all right. I am familiar with
 19 the book. It is a the volume I could not find earlier.
 20 I have no idea what has happened to it. I am surrounded
 21 by a mountain of folders with little opportunity to put
 22 them away. Yes, 1248, anyway.
 23 MR WEATHERBY: 1248 and 1249, those are the only two pages
 24 I am going to refer to.
 25 THE CHAIRMAN: Yes.

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1 MR WEATHERBY: This is your casebook for 3 March.
 2 **A. Yes.**
 3 Q. Mr Beer was asking you about the entry in Mr Granby's
 4 log, at 10.45, where he was conducting a review with
 5 Mr Sweeney; yes?
 6 **A. Yes.**
 7 Q. And referred to speaking to you?
 8 **A. Yes.**
 9 Q. It is clear, isn't it, that you had a conversation with
 10 Mr Granby around that time?
 11 **A. Yes.**
 12 Q. There is no note of that in your casebook, is there?
 13 **A. No, there is not.**
 14 Q. Why is that?
 15 **A. I don't know why there is no reference to it. I may**
 16 **have not deemed it relevant at the time.**
 17 Q. It puts us in a more difficult position now, doesn't it,
 18 because this morning with Mr Beer you were saying,
 19 "I can't remember. I can't recall", and you are not
 20 prompted by any contemporaneous note, are you?
 21 **A. No. I accept that. What I would say in defence of**
 22 **myself is, over the period of however many months it**
 23 **was, there are quite a number of entries within my**
 24 **books. Why I have not put that particular entry in,**
 25 **I don't know.**

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1 Q. Okay. Well, that I think was a conversation at
 2 mid-morning about the CVIT deliveries or collections;
 3 yes?
 4 **A. Yes.**
 5 Q. Now, presumably, we know that the period that is
 6 recorded is, I think, between 11.00 and 1.00 for the
 7 CVITs; yes?
 8 **A. Yes.**
 9 Q. Presumably, once that time had passed, you would then
 10 speak to Mr Granby again?
 11 **A. If the banks were closed, as well.**
 12 Q. Yes, so you start the day off thinking that a likely
 13 target is a cash in transit?
 14 **A. You are using the word "likely".**
 15 Q. Well, potential?
 16 **A. Potential.**
 17 Q. Potential. There is a certain concentration on that,
 18 both by you and Mr Granby; yes?
 19 **A. Yes.**
 20 Q. So that is why there is the review at 10.45. So,
 21 presumably, after the period when the cash in transits
 22 are dealt with, you then have another conversation,
 23 "Well, the time has passed Mr Granby"?
 24 **A. We would have done, yes.**
 25 Q. There would be some conversation about, "What is there

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<p>1 left?" Financial institutions, and you discussed the</p> <p>2 closing times; yes?</p> <p>3 A. Yes.</p> <p>4 Q. Where is that note?</p> <p>5 A. There is no notes.</p> <p>6 I see the point you are making, sir. There isn't</p> <p>7 any notes in relation to what other establishments were</p> <p>8 open at that time.</p> <p>9 Q. Yes, we know also that you received some further</p> <p>10 intelligence, on 3 March. I am not going to ask you</p> <p>11 about that. It is the closed material; yes?</p> <p>12 A. Sorry, yes.</p> <p>13 Q. But, no doubt, having received that, you then go and</p> <p>14 speak to Mr Granby?</p> <p>15 A. I would have spoken to Mr Granby, definitely.</p> <p>16 Q. Yes, where is note of that?</p> <p>17 A. It is in a different book.</p> <p>18 Q. Right. There is no note in your casebook about that?</p> <p>19 A. Sorry, the fact that I have spoken to Mr Granby?</p> <p>20 Q. Yes.</p> <p>21 A. No, there is not.</p> <p>22 Q. Yes.</p> <p>23 No doubt there would be other issues during the day</p> <p>24 where you would speak to Mr Granby, and no doubt others,</p> <p>25 and, again, no notes at all.</p> <p style="text-align: center;">Page 129</p>	<p>1 untimed.</p> <p>2 A. Yes.</p> <p>3 Q. Yes? No entry, at all, of anything you did during the</p> <p>4 day?</p> <p>5 A. Yes.</p> <p>6 Q. It is 1248 and 49?</p> <p>7 THE CHAIRMAN: I have it now, thank you.</p> <p>8 MR WEATHERBY: So now, looking back at it, there is no audit</p> <p>9 trail of what you were doing during the day. We</p> <p>10 can't --</p> <p>11 A. I understand that.</p> <p>12 Q. Yes. Do you have any explanation for that?</p> <p>13 A. No, I don't have any explanation for that.</p> <p>14 Q. Okay. Finally, just dealing with the note, which</p> <p>15 appears to be at 1830, looking at that note --</p> <p>16 A. Yes.</p> <p>17 Q. -- there is no note there, is there, of you saying,</p> <p>18 "Tipping point reached"?</p> <p>19 A. No, there is not.</p> <p>20 Q. There is no rationale for any tipping point having been</p> <p>21 met?</p> <p>22 A. No.</p> <p>23 Q. Or that you said to Mr Granby, "The point is reached, so</p> <p>24 far as the operation is concerned, where it would lead</p> <p>25 to arrest"?</p> <p style="text-align: center;">Page 131</p>
<p>1 A. I accept that, sir.</p> <p>2 Q. I say, "No notes at all", let's just be accurate about</p> <p>3 this. You have, on page 1248, notes about attending the</p> <p>4 TFU briefing?</p> <p>5 A. Yes.</p> <p>6 Q. Then, the VTD discussion with Ms Hurst?</p> <p>7 A. Yes.</p> <p>8 Q. Down to an entry which mentions 7.00 in the morning?</p> <p>9 A. That is the crime scene investigation manager, yes.</p> <p>10 Q. So you have not timed these, have you?</p> <p>11 A. No, I haven't, sir.</p> <p>12 Q. Yes. Any reason for that?</p> <p>13 A. No. No, no reason.</p> <p>14 Q. Would it be a fair inference that that last entry, on</p> <p>15 that page, would suggest that that entry was before</p> <p>16 7.00? It may not be, but it would be suggested,</p> <p>17 wouldn't it?</p> <p>18 A. Yes, sir, it would.</p> <p>19 Q. Yes, you could have made that entry at 9.00, but reading</p> <p>20 it through, it looks --</p> <p>21 A. No, it is not. Because it is not timed, it is not</p> <p>22 clear.</p> <p>23 Q. Yes, but, of course, if you had timed it, we would know.</p> <p>24 A. Yes.</p> <p>25 Q. Then there is no entry, then, until 18.30. Again,</p> <p style="text-align: center;">Page 130</p>	<p>1 A. No, I think the only kind of inference is in "vehicle</p> <p>2 x 3", which I know is incorrect. That was an assessment</p> <p>3 at -- and then the arrow pointing to</p> <p>4 Superintendent Granby is kind of inferring that is over</p> <p>5 to Mr Granby.</p> <p>6 Q. Yes.</p> <p>7 A. What I would also like to say is, on any other</p> <p>8 subsequent operations, I wouldn't necessarily make</p> <p>9 an entry in my policy book to say, "Tipping points now</p> <p>10 met".</p> <p>11 Q. But if you don't make an entry, we can't, looking back</p> <p>12 at it, all these years down the line, have an auditable</p> <p>13 record to hold you to.</p> <p>14 A. I completely understand that, sir, but the -- but once</p> <p>15 the tipping points are met, that is likely to be</p> <p>16 contained within the TFC's booklet.</p> <p>17 Q. Yes, which is kept by Mr Granby?</p> <p>18 A. Yes.</p> <p>19 Q. Which is his version of what happens?</p> <p>20 A. Yes.</p> <p>21 Q. I am talking about your version of what happens, perhaps</p> <p>22 so we could compare them; do you get my point?</p> <p>23 A. I do understand what you are saying, sir.</p> <p>24 Q. So, really, there ought to be a rationale. There ought</p> <p>25 to be a point at which you say the tipping point has</p> <p style="text-align: center;">Page 132</p>

<p>1 been reached and there ought to be a rationale.</p> <p>2 A. I understand what you are saying, sir. But, clearly,</p> <p>3 there is not, is there?</p> <p>4 Q. Yes, there isn't, but you would agree with me that that</p> <p>5 is what there should be there?</p> <p>6 A. I wouldn't agree with you. On subsequent operations,</p> <p>7 I have never put tipping points -- at that point, once</p> <p>8 it has gone to State Amber, I am concentrating on what</p> <p>9 is happening. I've got staff that are deployed --</p> <p>10 there's lots of other things going on. It is not</p> <p>11 something that I would automatically do.</p> <p>12 Q. Yes, I am aware there are other things going on, but you</p> <p>13 have not recorded those either.</p> <p>14 A. Sir, I understand what you are saying.</p> <p>15 MR WEATHERBY: Yes.</p> <p>16 Yes, thank you very much.</p> <p>17 THE CHAIRMAN: Any questions, Mr Davies?</p> <p>18 MR DAVIES: No, thank you, sir.</p> <p>19 THE CHAIRMAN: Ms Whyte?</p> <p>20 Questions from MS WHYTE</p> <p>21 MS WHYTE: Mr Cousen, in respect of Operation Vulture, can</p> <p>22 you recall whether you accessed any other records of</p> <p>23 crime relating to that operation, apart from the one</p> <p>24 that you have told us about?</p> <p>25 A. I may have done, ma'am. Within the office, in the Force</p> <p style="text-align: center;">Page 133</p>	<p>1 Q. Can you tell us whether you were aware of an operation</p> <p>2 called Botany, from 2001, which I think Mr Clark will be</p> <p>3 able to tell us about, which related to an investigation</p> <p>4 of robberies at financial institutions involving</p> <p>5 Ian Parkinson, Mr Cullen and Mark Azzopardi?</p> <p>6 A. I don't know if I was aware at the time. I am,</p> <p>7 obviously, aware now, but I am not sure.</p> <p>8 I think DC Clark had mentioned it on the briefing to</p> <p>9 Mr Ellison, but I don't know if that is my memory being</p> <p>10 jagged because I have since read that, or whether or not</p> <p>11 I was aware at the time.</p> <p>12 Q. Thank you.</p> <p>13 In relation to Operation Ascot in 2005, which was</p> <p>14 an operation primarily into Mr Totton and</p> <p>15 Mark Azzopardi, were you aware of the information</p> <p>16 generated by that about Mr Grainger's potentially</p> <p>17 suspicious activity in relation to a stolen Citroën</p> <p>18 which he was using the day before that vehicle was used</p> <p>19 in an offence on 28 April 2006; would you have been</p> <p>20 aware of that at the time?</p> <p>21 A. I was not aware at the time, but I have been</p> <p>22 subsequently made aware.</p> <p>23 Q. After Mr Grainger's death; is that when you have become</p> <p>24 aware of that?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 135</p>
<p>1 Robbery Unit at the time, there was files and files of</p> <p>2 historic operations. I may have done.</p> <p>3 Q. Thank you. You were taken, in some detail, to</p> <p>4 an indictment, if you recall, and how that indictment</p> <p>5 compared in the fact to the crime results?</p> <p>6 A. Yes.</p> <p>7 Q. Were you aware that there had been a predecessor to that</p> <p>8 indictment which had been stayed by a court, in which</p> <p>9 Mr Grainger had originally been indicted, on Count 1,</p> <p>10 for conspiracy to rob between the dates of</p> <p>11 8 October 1995 and 11 June 1996? Would you have been</p> <p>12 aware of that?</p> <p>13 A. I wasn't.</p> <p>14 Q. You were not. Thank you.</p> <p>15 Were you aware, during the events that you have been</p> <p>16 asked about over the last couple of days, of the fact</p> <p>17 that when Mr Grainger's house was searched in relation</p> <p>18 a drugs operation called Blythe, at 8 Thanet Close, that</p> <p>19 two sets of body armour, smoke grenades, overalls,</p> <p>20 balaclavas and masks had been found at his property?</p> <p>21 A. I don't remember being aware, ma'am.</p> <p>22 Q. You don't remember.</p> <p>23 I make it clear Mr Grainger was not arrested in</p> <p>24 respect of any of those items.</p> <p>25 A. No. Yes.</p> <p style="text-align: center;">Page 134</p>	<p>1 Q. Thank you.</p> <p>2 Can you assist us with how you might view, in terms</p> <p>3 of risk, a person who has no convictions for violence</p> <p>4 but, on the available intelligence, appears to associate</p> <p>5 and be suspected of being about to offend with people</p> <p>6 who are assessed to be dangerous?</p> <p>7 It is quite a mouthful.</p> <p>8 A. Yes. You have got to assess -- I think I said it on day</p> <p>9 one: you have to assess your highest risk, in terms of</p> <p>10 however you are going to mitigate that risk. You cannot</p> <p>11 kind of compartmentalise the different risks, in terms</p> <p>12 of how you deal with each person.</p> <p>13 Q. Now, at the time, you were investigating what you</p> <p>14 understood potentially to be a conspiracy to commit</p> <p>15 robbery; is that right?</p> <p>16 A. Yes.</p> <p>17 Q. I am not going to delve into the intricacies of joint</p> <p>18 enterprise or offences of robbery, or conspiracies to</p> <p>19 commit robbery, because the Chairman, happily, is well</p> <p>20 aware of all of those matters, given his experience.</p> <p>21 A. Yes.</p> <p>22 Q. But just to clear up one general misapprehension, to be</p> <p>23 guilty of conspiracy to rob, or even robbery, is it your</p> <p>24 understanding that you have to be in possession of</p> <p>25 a weapon or to use a weapon?</p> <p style="text-align: center;">Page 136</p>

<p>1 A. During the course of a robbery? Well, an element of 2 force has to be used. 3 Q. Or the threat of force? 4 A. Or the threat of force. 5 Q. You have been asked about errors during briefings and, 6 in particular, the errors relating to the 2005 Kirkham 7 robbery. 8 A. Yes. 9 Q. And you have been asked in some detail -- which I will 10 come back to -- about the sighting of a hacksaw and how 11 that may have been presented at critical times. 12 A. Yes. 13 Q. Did it suit you in any way -- and, if so, why? -- for 14 authorised firearms officers to receive overstated 15 accounts of intelligence? 16 A. Not at all. 17 Q. Can you think of any way in which that would profit your 18 investigative enterprise? 19 A. It wouldn't profit mine, at all. 20 Q. In terms of the surveillance consciousness of the 21 subjects, that you were dealing with, you have been 22 taken helpfully to certain details and I would just like 23 to raise a couple more. 24 A. Yes. 25 Q. Is it right that, at the Shire trial, Mr Totton accepted</p> <p style="text-align: center;">Page 137</p>	<p>1 Q. We know -- and if anybody wants the reference -- that, 2 at 18.03 that evening, the stolen Audi was parked in 3 Sandringham Road, in Worsley, and that is clear from the 4 surveillance log, at bundle O2, page 839. I will not 5 take you to that. 6 We know from the available surveillance that it 7 travelled to Culcheth? 8 A. Yes. 9 Q. It did what it did, and we have heard about that, and it 10 began returning at 19.33, which is on the surveillance 11 log, at page 842. 12 We know from the surveillance log that Mr Totton was 13 seen at 19.59 on Beatrice Road, coming from the 14 direction of Hazelhurst Road. So if we could just get 15 our bearings from the photographic aerial view of 16 Worsley, Sandringham Road, where it had been parked at 17 6.03, is right over here, on the western fringe of the 18 photo; do you have that? 19 A. Yes. 20 Q. Beatrice, if you look further east, and to the east of 21 the M60, is here, where my finger is, if that helps 22 anyone find it. It is very small writing. 23 A. Yes. 24 Q. Do you see that? 25 A. Yes.</p> <p style="text-align: center;">Page 139</p>
<p>1 that petrol cans had been used on previous occasions to 2 avoid the high performance cars being clocked on CCTV at 3 garages needing to refuel? 4 A. That's correct. 5 Q. For example, we would see reference in the CLIO actions 6 to Mr Totton using a phone box, even though it is quite 7 clear from the evidence at the Shire trial that he had 8 mobile phones at his disposal. 9 A. That is quite correct. 10 Q. Are those the type of activities that people involved in 11 serious organised crime sometimes indulge in to avoid 12 detection? 13 A. They are, yes. 14 Q. Was that within your knowledge at the time? 15 A. Yes, it was. 16 Q. Could I ask you, now, just a few questions about the 17 sighting of the hacksaw earlier, please? 18 A. Yes. 19 Q. This relates to the reasonableness or otherwise of the 20 inference that you drew that the hacksaw may have 21 travelled in the stolen Audi to Culcheth, on 29 March. 22 A. Yes. 23 Q. Then been removed from that car and placed into 24 Mr Totton's cleaner car, if I can put it that way. 25 A. Yes, legitimate car.</p> <p style="text-align: center;">Page 138</p>	<p>1 Q. Beatrice Road has a junction with Broad Oak, it 2 transects Broad Oak and it goes down towards Worsley 3 Road; do you see that? 4 A. Yes. 5 Q. If you look at the map, underneath, you can see that in 6 perhaps slightly clearer detail. Beatrice Road goes 7 over Broad Oak Road, along Langley Drive, and 8 Hazelhurst Road, as we can see, runs in a north-easterly 9 direction from Broad Oak Road; do you see that? 10 A. Yes. 11 Q. Mr Totton is seen at 19.59, on Beatrice, apparently 12 coming from the general direction of Hazelhurst. So one 13 assumes that's somewhere between Hazelhurst, Broad Oak 14 and Beatrice, but he was actually seen on Beatrice, 15 perhaps moving therefore in a northerly direction, 16 judging from the surveillance. That is when he is seen 17 placing an item, that was deemed to be a hacksaw, into 18 the boot of his vehicle. 19 A. Yes. 20 Q. By 8.03, we also know from the same surveillance log 21 that the red Audi is back in Sandringham Road. 22 A. Yes. 23 Q. We have the download of the Audi, which I think is at 24 K/1046. 25 A. Yes.</p> <p style="text-align: center;">Page 140</p>

<p>1 Q. Do you have that?</p> <p>2 A. Yes.</p> <p>3 Q. We can see it is parked up on Sandringham Road, and we</p> <p>4 can see that, at 18.03, it has moved on to Leigh Road,</p> <p>5 so it has started its progress. Throughout that</p> <p>6 remaining page we can see its movements around Culcheth,</p> <p>7 which I will not trouble you with.</p> <p>8 Go over to 1047. It remains doing its thing in</p> <p>9 Culcheth, and then you can see that at around about</p> <p>10 19.34 it is on the East Lincs. At 19.38, it re-enters</p> <p>11 Worsley in Newearth Road, and you can see that it uses</p> <p>12 a series of roads. It actually goes north off the</p> <p>13 East Lincs and goes around various streets before then</p> <p>14 coming back down and around to the area that we are</p> <p>15 interested in, which you can see at 19.57 --</p> <p>16 A. Yes.</p> <p>17 Q. -- where we see Broad Oak Park; do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. Which is the street by Beatrice Road where he is seen at</p> <p>20 19.59.</p> <p>21 A. Yes.</p> <p>22 Q. If you look at the right-hand column of this download,</p> <p>23 at 19.58, just before Mr Totton is seen with the</p> <p>24 hacksaw, the car becomes stationary briefly --</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 141</p>	<p>1 please, the emails bundle.</p> <p>2 Could you go to page 78, please.</p> <p>3 A. Yes.</p> <p>4 Q. Do we see an email there to Rocque Fernandes, copying in</p> <p>5 Anthony Creeley and Deb Hurst, requesting surveillance,</p> <p>6 at quarter to five in the afternoon, on 29 February.</p> <p>7 A. Yes.</p> <p>8 Q. I hope is that the same as yours, sir?</p> <p>9 THE CHAIRMAN: Did you say 78?</p> <p>10 MS WHYTE: I did. Page 78, of W. It should be an email,</p> <p>11 dated 29 February.</p> <p>12 THE CHAIRMAN: What is the time on it?</p> <p>13 MS WHYTE: 16.43, sir.</p> <p>14 THE CHAIRMAN: I have it. First line of the thing, yes.</p> <p>15 MS WHYTE: Are we all on the same page?</p> <p>16 THE CHAIRMAN: That was on 29 February?</p> <p>17 MS WHYTE: 29 February. Could I then invite you, please,</p> <p>18 Mr Cousen, to go to page 141 of the same bundle.</p> <p>19 A. Yes.</p> <p>20 Q. That is further email communication, on 2 March,</p> <p>21 an email from Deb Hurst to you, early in the morning,</p> <p>22 about planning staff for observation posts. You say,</p> <p>23 "Yes, please", you want that sorted out:</p> <p>24 "It looks like they have put it down for afternoons</p> <p>25 again."</p> <p style="text-align: center;">Page 143</p>
<p>1 Q. -- round about the Broad Oak mark?</p> <p>2 A. Yes.</p> <p>3 Q. Within a minute of that, he is seen putting the hacksaw</p> <p>4 into his legitimate car; is that correct?</p> <p>5 A. Yes, that's correct, ma'am.</p> <p>6 Q. Within four minutes, as we have established, the car has</p> <p>7 obviously travelled -- the stolen car that is -- has</p> <p>8 travelled west, back to its lay up in Sandringham Road;</p> <p>9 is that correct?</p> <p>10 A. That's correct.</p> <p>11 Q. Was 3 March 2012 the first time that three people had</p> <p>12 been in a stolen vehicle, on false plates, conducting</p> <p>13 what was suspected to be either preparatory or actual</p> <p>14 criminality?</p> <p>15 A. I think it was the first time that we could confirm that</p> <p>16 there was three people within that vehicle, because they</p> <p>17 had been seen to get into it by DC Clark.</p> <p>18 Q. So the first time there had been a sighting, certainly</p> <p>19 at the initial point of entry into the car?</p> <p>20 A. Yes.</p> <p>21 Q. Thank you.</p> <p>22 You mentioned the fact that you had booked</p> <p>23 surveillance --</p> <p>24 A. Yes.</p> <p>25 Q. -- for the following week. Could we go to bundle W,</p> <p style="text-align: center;">Page 142</p>	<p>1 Is that further communication on the early morning</p> <p>2 of 2 March, trying to arrange staff for the following</p> <p>3 week for surveillance purposes?</p> <p>4 THE CHAIRMAN: Could I have that reference again, please?</p> <p>5 MS WHYTE: Page 141, I hope, unless my pages are out.</p> <p>6 A. Yes, the DSU bids meeting had taken place on the 2nd, so</p> <p>7 I had been forwarded an email to say that they had been</p> <p>8 successful with the bid and, in essence, I forwarded it</p> <p>9 on to DS Hurst and then she was asking me if we needed</p> <p>10 to sort the staff out for the following week. And</p> <p>11 I confirmed that we did.</p> <p>12 Q. Did Superintendent Granby, at any stage, say or do</p> <p>13 anything that gave you the impression that he felt under</p> <p>14 pressure to bring this part of your investigation to</p> <p>15 an arrest conclusion?</p> <p>16 A. No, absolutely not.</p> <p>17 Q. Could you put that bundle to one side for now, please.</p> <p>18 A. Yes.</p> <p>19 Q. If you turn to the P bundle, page 17.</p> <p>20 This is the notebook of your deputy --</p> <p>21 THE CHAIRMAN: Hang on.</p> <p>22 Yes.</p> <p>23 MS WHYTE: Although the date is slightly overridden by some</p> <p>24 copying, it is Tuesday, 31 January. So this is whilst</p> <p>25 investigations are still going on in relation to</p> <p style="text-align: center;">Page 144</p>

<p>1 suspected criminality in Staffordshire.</p> <p>2 A. Yes.</p> <p>3 Q. Do we see, there, Ms Hurst referring to various actions?</p> <p>4 A. Yes.</p> <p>5 Q. Including investigative matters, GSR kits?</p> <p>6 A. Yes.</p> <p>7 Q. And if we go down to page 158, can you see she has</p> <p>8 written:</p> <p>9 "Speak Chadderton? Re custody Ashton?"</p> <p>10 A. Yes.</p> <p>11 Q. "Openshaw re availability of the prison van."</p> <p>12 A. Yes.</p> <p>13 Q. Then, under the head of the arrow:</p> <p>14 "Four cell bus available tomorrow."</p> <p>15 A. Yes.</p> <p>16 Q. Does that look like Ms Hurst, on 31 January, was trying</p> <p>17 to make arrangements for prisoners and custody of them?</p> <p>18 A. Yes, they'd be transporting prisoners from the</p> <p>19 Staffordshire area if arrests had been made.</p> <p>20 Q. Would you transport them without having a general sense</p> <p>21 of where they were going to be housed upon arrival in</p> <p>22 your force area?</p> <p>23 A. No, we had a custody silver who would have made merry</p> <p>24 hell if we had have done that. We need to book the</p> <p>25 cells first.</p> <p style="text-align: center;">Page 145</p>	<p>1 deputy where to house prisoners should arrests take</p> <p>2 place?</p> <p>3 A. Yes. DCI Paul Clews was a DCI in the Staffordshire</p> <p>4 area, but yes.</p> <p>5 Q. I think you referred to Mr Hughes. We can see other</p> <p>6 issues written on page 1202. You have been asked about</p> <p>7 some of them by Mr Beer. I am not going to go there --</p> <p>8 GSR, forensic strategies, prisoner van, et cetera.</p> <p>9 If you go to the bottom half of page 1203, you have</p> <p>10 got Ben Sefton, who is the person you were in email</p> <p>11 contact with, as Mr Beer took you to.</p> <p>12 A. Yes.</p> <p>13 Q. Then at page 1204, at 11.55:</p> <p>14 "Spoke to DS Dave Hughes. He is arranging five</p> <p>15 double crew vans for prisoner processing, forensic</p> <p>16 issues."</p> <p>17 Is that the Mr Hughes you were referring to?</p> <p>18 A. Yes.</p> <p>19 Q. So local division in Staffordshire were going to assist</p> <p>20 you with housing the prisoners until such time as you</p> <p>21 could get them to Manchester, it seems from this. Is</p> <p>22 that a fair analysis of what we have just gone through?</p> <p>23 A. Yes, ma'am. Yes.</p> <p>24 Q. Would you go to page 1239 of the same bundle. This is</p> <p>25 1 March. We can see you have written at the top of that</p> <p style="text-align: center;">Page 147</p>
<p>1 Q. If we could go, please, to K/1201, which is your</p> <p>2 notebook. This is a notebook entry from you for the</p> <p>3 same day, 31 January.</p> <p>4 A. Yes.</p> <p>5 Q. You have written, "Discussed scene management. Should</p> <p>6 arrests be made?" With DS Hurst.</p> <p>7 A. Yes.</p> <p>8 Q. Then there are various issues:</p> <p>9 "Prisoners escorted to local custody office via</p> <p>10 division vans, at which time all external clothing</p> <p>11 and ..." I can't read that word, I am afraid?</p> <p>12 A. "Footwear".</p> <p>13 Q. "Footwear", thank you. "... will be seized", and you</p> <p>14 deal with what would happen to the vehicles if there was</p> <p>15 an arrest.</p> <p>16 Again, is this you planning in case arrests do take</p> <p>17 place, for forensic and custody and transportation</p> <p>18 issues?</p> <p>19 A. That's correct. Yes, ma'am.</p> <p>20 Q. There is a reference to DCI Paul Clews on the following</p> <p>21 page:</p> <p>22 "I need to have a point of contact regarding getting</p> <p>23 vans to transport, custody cell locations."</p> <p>24 A. Yes.</p> <p>25 Q. Were you actively researching on 31 January with your</p> <p style="text-align: center;">Page 146</p>	<p>1 page:</p> <p>2 "DS Hurst will coordinate prisoner processing and</p> <p>3 scene management. Initial contingency would be to</p> <p>4 use ..."</p> <p>5 Is that "OP stats"?</p> <p>6 A. Yes.</p> <p>7 Q. "No longer required to manage staff. DI Fernandes would</p> <p>8 then turn out to oversee these actions."</p> <p>9 A. Yes.</p> <p>10 Q. Again, is that you in the activity of arrest planning,</p> <p>11 should arrests take place?</p> <p>12 A. Yes.</p> <p>13 Q. Anything unusual in that?</p> <p>14 A. No, ma'am.</p> <p>15 Q. You have been asked about hats. Can we just clarify,</p> <p>16 I think each of the subjects in the stolen Audi on</p> <p>17 3 March did have --</p> <p>18 THE CHAIRMAN: The occupants.</p> <p>19 MS WHYTE: The occupants, yes -- had gloves, is that</p> <p>20 correct?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. Mr Totton's with reinforced knuckles?</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. Mr Grainger and Mr Totton it seems had left their phones</p> <p>25 in the Volkswagen that Mr Grainger had been using and</p> <p style="text-align: center;">Page 148</p>

<p>1 their phones were switched off?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. Mr Travers I think had his with him, again switched off,</p> <p>4 is that correct?</p> <p>5 A. That's correct, ma'am.</p> <p>6 Q. In relation to the scene at Culcheth, we know, and I am</p> <p>7 sure we will hear more, that Cheshire had primacy for</p> <p>8 perfectly good and understandable reasons?</p> <p>9 A. Yes.</p> <p>10 Q. We know from an email that you sent Cheshire to</p> <p>11 an officer called Wenham, which is at G2/2136, if</p> <p>12 anybody wants the reference, that you wanted the open</p> <p>13 land near the scene searched, is that right? Do you</p> <p>14 remember?</p> <p>15 A. That's correct.</p> <p>16 Q. That was around about 6 March?</p> <p>17 MR BEER: Sorry, what was the reference?</p> <p>18 MS WHYTE: G2/2136.</p> <p>19 MR BEER: 6 March.</p> <p>20 MS WHYTE: 6 March. You have emailed Nigel Wenham,</p> <p>21 identifying several areas of open land that you wanted</p> <p>22 search, you wanted to use a dog handler, et cetera.</p> <p>23 "The areas requiring searching are in Cheshire. My</p> <p>24 locations, aware my subjects have been seen to frequent.</p> <p>25 I have asked for a dog."</p> <p style="text-align: center;">Page 149</p>	<p>1 didn't fall within their jurisdiction, as it were, so</p> <p>2 you were going through Cheshire because of the protocols</p> <p>3 and requirements that needed to be observed, is that</p> <p>4 a fair summary.</p> <p>5 A. It is a fair summary.</p> <p>6 Q. Just A couple more issues.</p> <p>7 You talk in your witness statement at page H/88, if</p> <p>8 anyone needs it, about pleas that were offered at the</p> <p>9 Operation Shire trial.</p> <p>10 A. Yes.</p> <p>11 Q. I just want to establish with you what your recollection</p> <p>12 was, if you still have one, of what pleas were offered</p> <p>13 and by whom.</p> <p>14 A. My recollection is that pleas were offered by</p> <p>15 Robert Rimmer, David Totton and Joseph Travers, and that</p> <p>16 the offer of the plea was for conspiracy to steal large</p> <p>17 amounts of cash. There had been probably a day and</p> <p>18 a half and of kind of discussions. I think the initial</p> <p>19 indication was that Robert Rimmer was not willing to</p> <p>20 enter a guilty plea. They went back to the prison</p> <p>21 system and then, the following day, that was when it was</p> <p>22 indicated that they were willing to offer those pleas.</p> <p>23 Q. Can you remember whether that was before or after the</p> <p>24 case had been opened to a jury by Mr Cole, Queen's</p> <p>25 Counsel?</p> <p style="text-align: center;">Page 151</p>
<p>1 Et cetera.</p> <p>2 A. Yes.</p> <p>3 Q. Were you aware at that stage of what, if any, cordon had</p> <p>4 existed in relation to Cheshire's search?</p> <p>5 A. I may have been. I can't remember. I think it was the</p> <p>6 car park -- I was aware there was a cordon on because</p> <p>7 I had sent a couple of staff to go and they had been</p> <p>8 turned away from the scene.</p> <p>9 Q. Yes. If we look at the second paragraph on page 2138,</p> <p>10 you say:</p> <p>11 "Having been to a meeting with the IPCC today, they</p> <p>12 have confirmed that they are not conducting any</p> <p>13 inquiries away from the car park, so the searches would</p> <p>14 not fall within their investigation."</p> <p>15 Hence you needing to go through --</p> <p>16 THE CHAIRMAN: Where is that, sorry?</p> <p>17 MS WHYTE: It should be, sir, the second typed paragraph</p> <p>18 near the top of page 2138 of bundle G2.</p> <p>19 THE CHAIRMAN: Sorry, what page?</p> <p>20 MS WHYTE: 2138? The second paragraph which starts "The</p> <p>21 areas ..."</p> <p>22 THE CHAIRMAN: Got that. The second sentence of that?</p> <p>23 MS WHYTE: Yes, the second sentence.</p> <p>24 So you had spoken to the IPCC on the 6th, you had</p> <p>25 not been searching the area around the car park, and it</p> <p style="text-align: center;">Page 150</p>	<p>1 A. That was before.</p> <p>2 Q. So there was the activity that can sometimes precede the</p> <p>3 very beginning of a trial?</p> <p>4 A. Yes.</p> <p>5 Q. Can you recall whether there were discussions at that</p> <p>6 stage, or indeed at any other stage, about pleas being</p> <p>7 offered in relation to conspiracy to steal anything</p> <p>8 other than cash?</p> <p>9 A. Not that I was aware of. The negotiation was around the</p> <p>10 conspiracy to steal. When Mr Cole first mentioned it,</p> <p>11 it was on the basis that there would have to be more</p> <p>12 than just an offer of conspiracy to steal and it was</p> <p>13 when he returned, that is when he told us about the</p> <p>14 conspiracy to steal large amounts of cash.</p> <p>15 Q. Were you involved in the decision making and discussion</p> <p>16 around whether or not such pleas should be accepted?</p> <p>17 A. I was involved in that process.</p> <p>18 Q. One last issue.</p> <p>19 On 3 March 2012, what sort of face-to-face verbal</p> <p>20 contact did you have with the firearms officers who had</p> <p>21 been present at the briefing very early in the morning?</p> <p>22 A. Sorry, at what time on the 3rd?</p> <p>23 Q. Early in the morning, when the firearms briefing was</p> <p>24 being prepared, presented, and thereafter, how much</p> <p>25 contact did you have with actual authorised firearms</p> <p style="text-align: center;">Page 152</p>

1 officers?
 2 **A. Very -- once the briefing had been done, I didn't see**
 3 **the firearms officers again.**
 4 Q. For the rest of the day?
 5 **A. Yes.**
 6 Q. I am trying to establish how long you would have had
 7 an opportunity to chat with any one of them about any of
 8 the people who were under investigation?
 9 **A. I can't remember what time I got to Openshaw but I was**
 10 **obviously in consultation with Mr Granby at this point.**
 11 **We had a specific issue around the tipping points that**
 12 **we needed to discuss and he needed to make sure that**
 13 **I was satisfied with the tipping points. I don't**
 14 **remember any specific conversation with the firearms**
 15 **officers.**
 16 MS WHYTE: Thank you very much.
 17 Thank you, sir.
 18 THE CHAIRMAN: Thank you.
 19 Do you have any other questions, Mr Beer?
 20 Further questions from MR BEER
 21 MR BEER: Just one, please.
 22 I think you were involved in -- I think you called
 23 the negotiations over pleas?
 24 **A. Yes.**
 25 Q. Your position was that you reluctantly would accept

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1 pleas to a conspiracy to steal?
 2 **A. Yes, large amounts of cash.**
 3 Q. So you were happy to accept a conspiracy to steal, not
 4 conspiracy to rob?
 5 **A. Well, I was -- it was a negotiation, wasn't it? It was**
 6 **a decision around they wouldn't plead to a conspiracy to**
 7 **rob.**
 8 Q. But you were content to accept it because, what, you
 9 didn't think there was the evidence to prove
 10 a robbery --
 11 **A. Not at all.**
 12 Q. -- a conspiracy to rob?
 13 **A. No, not at all.**
 14 **It was said there it was reluctantly to accept that**
 15 **plea. That is down to I know what happens on trials.**
 16 **I have had cases that have gone to trial where you have**
 17 **had every piece of evidence available to you and then,**
 18 **after a trial, it has gone to not guilty.**
 19 **So just knowing how the judicial system works, and**
 20 **putting evidence in front of juries, knowing that, the**
 21 **nature of this investigation, there was a lot of phone**
 22 **evidence that the jury would have to consider.**
 23 **So, yes, I was willing to accept it but it was very**
 24 **much reluctant, with a lot of reluctance.**
 25 Q. It was in fact the CPS that put a stop to it and said,

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1 "No, we are going ahead"?
 2 **A. I think it was a joint decision, actually, between one**
 3 **of senior officers within GMP and the CPS.**
 4 Q. Yes. And who was that?
 5 **A. Darren Shenton.**
 6 MR BEER: Yes, thank you very much.
 7 They are the only open questions that I ask, unless
 8 there is anything that you wish to ask the officer now?
 9 THE CHAIRMAN: No, there is not. Thank you, Mr Beer.
 10 MR BEER: Might we rise for a short moment to reconfigure
 11 the court.
 12 THE CHAIRMAN: Certainly.
 13 I can indicate, if it assists, because I suspect we
 14 are a bit behind our intended schedule --
 15 MR BEER: We are, yes.
 16 THE CHAIRMAN: -- that, within reason, I can sit as late as
 17 is required to complete the evidence of this witness
 18 today. So, if that is going to be a feasible target --
 19 MR BEER: Thank you, sir.
 20 MR DAVIES: Sir, do you want us back tonight, the core
 21 participants, or not?
 22 THE CHAIRMAN: When you say "want you back", for what
 23 purpose?
 24 MR DAVIES: Exactly. You are going into closed session.
 25 THE CHAIRMAN: I am going into closed session but it does

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1 not follow that it might not be sensible for at least
 2 one representative of a core participant to be present
 3 for the purpose of any potential discussions that might
 4 arise.
 5 Mr Beer, do you envisage anything arising today?
 6 MR BEER: Yes, I had said to all core participants -- it is
 7 entirely a matter for their choice -- that, if I was
 8 them, I would wait around because there is always the
 9 potential that the officer may say something that he
 10 believes it is necessary to give in closed, that in fact
 11 could be in open. Alternatively, there may be some
 12 evidence which you decide ought to be given in open and
 13 they would wish to be here to hear that.
 14 THE CHAIRMAN: It would save him having to come back in the
 15 morning.
 16 MR DAVIES: I don't disagree. It was not said to me, that
 17 is all. I was given a two-hour time estimate for the
 18 later part of the exercise.
 19 THE CHAIRMAN: It would be handy if somebody waited. I am
 20 not going to require it but I can foresee that there
 21 could otherwise be a difficulty. If it is feasible to
 22 finish his evidence otherwise today -- if that is not
 23 going to happen anyway, it may be different, but think
 24 the target is to try and finish his evidence today and
 25 if that is a feasible target, then we should do

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<p>1 everything to avoid him having to come back just for 2 a question or two in the morning. 3 MR BEER: Ms Cartwright says it is going to take about 20 4 minutes to reconfigure the courtroom, and to get out of 5 the safes all of the material. 6 With that in mind, it may be pushing it to complete 7 him today. Shall we have a stock take amongst 8 ourselves, rather than doing it in court. 9 THE CHAIRMAN: I think is that the best thing. 10 (3.35 pm) 11 (Proceedings continued in closed session) 12 (The Inquiry adjourned until the following day) 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 157</p>	
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