

<p>1 Tuesday, 18 April 2017 2 (10.30 am) 3 THE CHAIRMAN: Yes, Mr Beer. 4 MR BEER: David Totton, please. 5 MR DAVID TOTTON (sworn) 6 THE CHAIRMAN: Thank you, Mr Totton. You are welcome to sit 7 down if you would be more comfortable. You may be asked 8 to look at various documents and you may find it easier 9 if you are seated at that little desk, there. 10 Now, Mr Totton, there is something very important 11 that I need to explain to you. I am going to tell you 12 about it once, now, so that I don't have to keep 13 repeating it throughout your evidence. That is why I am 14 telling you before you have been asked any questions at 15 all. 16 So can I ask you please to listen very carefully to 17 what I am about to say? 18 <b>A. Yes.</b> 19 THE CHAIRMAN: You do not have to answer any question that 20 might tend to show that you yourself have committed 21 a criminal offence. 22 In other words, if at any stage during your evidence 23 you are asked a question, the answer to which might tend 24 to show that you yourself have committed a criminal 25 offence, you are entitled to refuse to answer that</p> <p style="text-align: center;">Page 1</p>	<p>1 namely Mr Rimmer, Mr Travers and Mr Grainger? 2 <b>A. Yes.</b> 3 Q. To start with, Mr Rimmer, please. By March 2012, how 4 long had you known Robert Rimmer for? 5 <b>A. Known him about five years, I think.</b> 6 Q. Can you just keep your voice up a bit. People at the 7 back have got to hear. 8 <b>A. About five years.</b> 9 Q. About five years or so. 10 I think when you gave evidence at Manchester Crown 11 Court, previously, you said you were very close, is that 12 right? 13 <b>A. Yes, we was close, yes.</b> 14 Q. You described him as being then your best friend? 15 <b>A. That's right.</b> 16 Q. Was that true? 17 <b>A. Yes, I was living with him at the time, yes.</b> 18 Q. Sorry, you were? 19 <b>A. I used to live with him.</b> 20 THE CHAIRMAN: Living with him. 21 MR BEER: I think that is because you had some marital 22 difficulties and you had moved out and were living with 23 him; is that right? 24 <b>A. Something like that, yes.</b> 25 Q. Where were you living at that time with him?</p> <p style="text-align: center;">Page 3</p>
<p>1 question, do you understand? 2 <b>A. Yes.</b> 3 THE CHAIRMAN: You cannot refuse to answer a question on 4 other grounds but you are always subject to that right, 5 you can refuse to answer any question the answer to 6 which might tend to show that you yourself are guilty of 7 committing a criminal offence. 8 It applies throughout the whole of your evidence, so 9 would you please keep that principle in mind throughout. 10 Thank you. 11 Questions from MR BEER 12 MR BEER: Mr Totton, my name is Jason Beer and I ask 13 questions on behalf of the Inquiry. 14 If you look at the folder in front of you there, at 15 the first tab, which has a number 1 next to it, there 16 should be a witness statement dated 26 April 2012. If 17 you look, it goes over four or five pages in your name. 18 I think you have seen it before, haven't you? 19 <b>A. I have seen it before, yes.</b> 20 Q. Are the contents of that witness statement true to the 21 best of your knowledge and belief? 22 <b>A. Yes.</b> 23 Q. Thank you. 24 Can I start by asking you come questions about your 25 friendships or relationships with three other men,</p> <p style="text-align: center;">Page 2</p>	<p>1 <b>A. I forget the address, you might have it.</b> 2 Q. Was it 6 The Pines in Moston? 3 <b>A. Yeah, that's right, yes.</b> 4 Q. Okay, and had you moved out then from 8 Thanet Close? 5 <b>A. Yes, I think.</b> 6 Q. Yes? 7 <b>A. Yes, I had moved out from there, yes, to there.</b> 8 Q. He was putting up you effectively, is that right? 9 <b>A. Yes.</b> 10 Q. What about the Skyline Apartments in Manchester city 11 centre? Did you have any connection with those? 12 <b>A. Yes, I was staying there after The Pines.</b> 13 Q. Sorry? 14 <b>A. I was staying there for a couple of weeks after</b> 15 <b>The Pines.</b> 16 Q. Was that rented by you? 17 <b>A. Rented, yes.</b> 18 Q. Okay. What about Joseph Travers? By March 2012, how 19 long had you known Joseph Travers for? 20 <b>A. I had known Joey about 10 years. Known him most of his</b> 21 <b>life, yes.</b> 22 Q. Did you know him through his brother? 23 <b>A. Yes, that's right.</b> 24 Q. That was your main connection, was it? 25 <b>A. That's right.</b></p> <p style="text-align: center;">Page 4</p>

<p>1 Q. And was that Aaron?</p> <p>2 <b>A. That's right.</b></p> <p>3 Q. You said again at your trial that you wouldn't see him</p> <p>4 as regularly as Robert Rimmer, because you would see</p> <p>5 Robert on a daily basis, but would see him very</p> <p>6 regularly, is that right?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. And same questions in relation to Anthony Grainger;</p> <p>9 by March 2012, how long had you known Anthony Grainger</p> <p>10 for?</p> <p>11 <b>A. I had known him since being 10 years old.</b></p> <p>12 Q. Okay, and was that from the time that you moved to</p> <p>13 Salford?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. So you had known him since he was a boy and you were</p> <p>16 a boy?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Yes?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. What about his brother, Stuart Grainger; did you know</p> <p>21 him too?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. I am not going to ask you about some visits that you</p> <p>24 paid with other people, including Anthony, to Stoke,</p> <p>25 in January 2012 --</p> <p style="text-align: center;">Page 5</p>	<p>1 MS WHYTE: I am sorry, I am really struggling to hear, could</p> <p>2 you speak up, please.</p> <p>3 THE CHAIRMAN: Can you keep your voice up, please,</p> <p>4 Mr Totton.</p> <p>5 MR BEER: Thank you.</p> <p>6 Do you know the name of the guy?</p> <p>7 <b>A. Fenton, I think he was called.</b></p> <p>8 Q. Fenton?</p> <p>9 <b>A. I don't know the guy, so ...</b></p> <p>10 Q. Had you any previous contact with the guy?</p> <p>11 <b>A. No.</b></p> <p>12 Q. Did you know what he looked like? Did Anthony Grainger</p> <p>13 give you a description of him?</p> <p>14 <b>A. A bit of a big guy from what I remember, but apart from</b></p> <p>15 <b>that I didn't ... no.</b></p> <p>16 Q. What were you going to do if you found him?</p> <p>17 <b>A. Well, basically ask for the money back, what was owed,</b></p> <p>18 <b>and see how it was going to be paid back, or whatever</b></p> <p>19 <b>like that.</b></p> <p>20 Q. What was your purpose of being there?</p> <p>21 <b>A. I was there as a bit of back up.</b></p> <p>22 Q. What do you mean by "a bit of back up"?</p> <p>23 <b>A. Just to show a bit of help on his part.</b></p> <p>24 Q. You might need to be a bit more explicit than that.</p> <p>25 I think I know what you mean, but you tell us.</p> <p style="text-align: center;">Page 7</p>
<p>1 <b>A. Yes.</b></p> <p>2 Q. -- and to St Helens, in February 2012. I am going to</p> <p>3 concentrate on trips to Culcheth in the back end</p> <p>4 of February 2012 and early March 2012, in particular on</p> <p>5 what happened in the car park, on the 3rd; okay?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Before going to the car park on the 3rd, I just want to</p> <p>8 ask you a small number of questions about two previous</p> <p>9 visits to Culcheth that you made on 29 February and</p> <p>10 1 March; okay?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. 29 February, that was a Wednesday, I think it is right</p> <p>13 you travelled to Culcheth that day?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. What was the reason for your visit to Culcheth?</p> <p>16 <b>A. We was looking for someone who owed a bit of money.</b></p> <p>17 Q. Who did the someone owe a bit of money to?</p> <p>18 <b>A. It was Anthony over a car, from what I can remember.</b></p> <p>19 Q. What did you know about him owing money to Anthony over</p> <p>20 a car?</p> <p>21 <b>A. Just that was it was outstanding money that was owed to</b></p> <p>22 <b>him.</b></p> <p>23 Q. How much was it?</p> <p>24 <b>A. It was a couple of grand, from what I remember. It</b></p> <p>25 <b>was --</b></p> <p style="text-align: center;">Page 6</p>	<p>1 <b>A. We was just there to ... Just there as back up really,</b></p> <p>2 <b>basically. Just in case, you know, just to put a bit of</b></p> <p>3 <b>pressure on the guy.</b></p> <p>4 Q. A bit of physical presence?</p> <p>5 <b>A. A bit of a physical presence, yes.</b></p> <p>6 Q. Now, you went there, I think, in the red Audi S Line; is</p> <p>7 that right?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Whose car was that?</p> <p>10 <b>A. That was a stolen car.</b></p> <p>11 Q. Did you know it was stolen?</p> <p>12 <b>A. Yes, I knew it was stolen.</b></p> <p>13 Q. Who had control of it?</p> <p>14 <b>A. Anthony had control of the car.</b></p> <p>15 Q. How did he have control of it? Did he have the keys?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Did you know who had stolen it?</p> <p>18 <b>A. No. No, I didn't know who stole it, no.</b></p> <p>19 Q. But you knew it was stolen?</p> <p>20 <b>A. I knew it was stolen, yes.</b></p> <p>21 Q. We know that it was being kept on a street, or streets,</p> <p>22 in Boothtown?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Why was it being kept on residential streets in</p> <p>25 Boothtown?</p> <p style="text-align: center;">Page 8</p>

<p>1 <b>A. It was a stolen car, so it was parked where it would be</b> 2 <b>parked.</b> 3 Q. Just keep your voice up again, please. 4 <b>A. Because it was a stolen car, so they would park it in</b> 5 <b>places where it wouldn't normally be taken or parked by</b> 6 <b>the police.</b> 7 Q. There was a sort of a plan to put it in a residential 8 area, so it didn't, what, stick out; is that right? 9 <b>A. That's right.</b> 10 Q. So the police wouldn't be suspicious about it? 11 <b>A. Yes.</b> 12 Q. So that it was not associated with your address or 13 Anthony's address? 14 <b>A. That's right.</b> 15 Q. Now, you have given some evidence in the past about what 16 you do when you travel in a stolen car, in terms of 17 steps to conceal your identity. 18 <b>A. Yes.</b> 19 Q. Can you tell the chairman about those, please; what do 20 you normally do? What did you normally do? 21 <b>A. What do you mean?</b> 22 Q. You said when you have given evidence before you have 23 told the court about some steps that you took to conceal 24 your identity. 25 <b>A. Me?</b></p> <p style="text-align: center;">Page 9</p>	<p>1 <b>A. Yes.</b> 2 Q. We know that on 3 March, 2012, so moving forward a bit, 3 you were wearing some gloves that had reinforced 4 knuckles? 5 <b>A. Yes, the motorbike gloves.</b> 6 Q. I'm sorry? 7 <b>A. Motorbike gloves.</b> 8 Q. Okay. 9 Were you deliberately wearing gloves that had 10 reinforced knuckles? 11 <b>A. No, I just use them, they were what I'd use on</b> 12 <b>a motorbike, when I am going out or been out biking and</b> 13 <b>that before, so they are gloves I use for that as well.</b> 14 Q. Did you need to use gloves with reinforced knuckles for 15 what you were going to do on the 3rd? 16 <b>A. What do you mean?</b> 17 Q. Well, if you were going to provide a physical presence, 18 as you have said, would you wear reinforced knuckled 19 gloves for that purpose? 20 <b>A. They were just gloves that I would always wear, that</b> 21 <b>I would wear the previous times.</b> 22 Q. What about items of clothing that you would wear, would 23 you wear anything specific if you were going out in 24 a stolen car? 25 <b>A. I would just wear trackies, trainers.</b></p> <p style="text-align: center;">Page 11</p>
<p>1 Q. Yes, if you travel in a stolen car. 2 <b>A. Yes, above the -- well, obviously, a balaclava, so if we</b> 3 <b>was to be chased or anything like that or --</b> 4 Q. If you just keep your voice up again. 5 <b>A. If we was to be chased, or anything like that, I would</b> 6 <b>use my balaclava, so I wouldn't be recognised.</b> 7 Q. If you were to be chased by who? 8 <b>A. By the police or anything like that.</b> 9 Q. You said you would "use your balaclava", what do you 10 mean -- 11 THE CHAIRMAN: "So I wouldn't be recognised", he said. 12 MR BEER: Yes, you would pull it down? 13 <b>A. I would do, yes.</b> 14 Q. Would you have it on, ie as a rolled up hat, or would 15 you have it in your pocket or something? 16 <b>A. I would have it on as a rolled up hat.</b> 17 Q. So, in the event you were chased, you would pull it 18 down? 19 <b>A. Yes.</b> 20 Q. What, if any, other steps would you take to make sure 21 that you were not connected to the car? 22 <b>A. I would wear gloves.</b> 23 Q. Okay, why would you wear gloves? 24 <b>A. Fingerprints.</b> 25 Q. So to prevent your fingerprints being left on the car?</p> <p style="text-align: center;">Page 10</p>	<p>1 Q. Any other steps you might take to conceal your movements 2 if you were going out in a stolen car, like on 29th? 3 I am thinking about your mobile phone in particular. 4 <b>A. Yes, I had left my mobile phone.</b> 5 Q. Sorry? 6 <b>A. I had left that in the Golf.</b> 7 Q. Why did you leave your mobile in the Golf? 8 <b>A. Just so it couldn't be tracked.</b> 9 Q. In your trial, you said that whenever you get into 10 a stolen car you leave your mobile phone behind. 11 <b>A. I would do, yes.</b> 12 Q. Is that so that your mobile cannot be tracked? 13 <b>A. Yes.</b> 14 Q. So, on the 29th, who else was with you; was it just you 15 and Anthony? 16 If you cannot remember just say so. 17 <b>A. No, I can't remember on the 29th.</b> 18 Q. How did you arrange to meet up? 19 <b>A. By phone call.</b> 20 Q. Okay. So who drove to Culcheth? 21 <b>A. Anthony would drive.</b> 22 Q. Were you in the front passenger seat? 23 <b>A. Yes.</b> 24 Q. What was the plan? 25 <b>A. On?</b></p> <p style="text-align: center;">Page 12</p>

<p>1 Q. On the 29th?</p> <p>2 <b>A. 29th, just driving round the Culcheth area, obviously to</b></p> <p>3 <b>try and locate this guy.</b></p> <p>4 Q. What connection had the guy with Culcheth?</p> <p>5 <b>A. He was aware that he was living in that area and he</b></p> <p>6 <b>drank and he lived in the area, from as far as I was</b></p> <p>7 <b>aware, and that is where he was drinking in in that area</b></p> <p>8 <b>as well.</b></p> <p>9 Q. Did you know where he was drinking?</p> <p>10 <b>A. Not specifically, but a pub round that little area.</b></p> <p>11 Q. Okay.</p> <p>12 I am asked again if you can keep your voice up,</p> <p>13 please.</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. I think you said that he was drinking in pubs in that</p> <p>16 area?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Did you get all of this information from Anthony?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Did you know whether the man -- Fenton, I will call</p> <p>21 him -- had any other connection to Culcheth?</p> <p>22 <b>A. No, I don't know.</b></p> <p>23 Q. So Anthony Grainger drove you to Culcheth, and what did</p> <p>24 you do when you arrived there?</p> <p>25 <b>A. We was just circling around the area for a bit and then</b></p> <p style="text-align: center;">Page 13</p>	<p>1 Q. You, I think, ended up in a car park, the same car park</p> <p>2 that you were to end up in on 3 March?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Why did you go to the car park?</p> <p>5 <b>A. To check -- I think there was a pub at the back. A pub</b></p> <p>6 <b>at the back where possibly he would be parking up or he</b></p> <p>7 <b>could be spotted round there.</b></p> <p>8 THE CHAIRMAN: There was a pub at the back?</p> <p>9 <b>A. Yeah, there was a pub at the back of the car parks</b></p> <p>10 <b>around there.</b></p> <p>11 THE CHAIRMAN: I know it is difficult, can you please try</p> <p>12 and keep your voice up. There are people having a lot</p> <p>13 of difficulty.</p> <p>14 <b>A. Yes.</b></p> <p>15 MR BEER: Where was that pub?</p> <p>16 <b>A. I think it was at the back.</b></p> <p>17 Q. The back of?</p> <p>18 <b>A. The back of the car park.</b></p> <p>19 Q. Do you know the name of the pub?</p> <p>20 <b>A. Called the Cherry Tree, I think.</b></p> <p>21 Q. The Cherry Tree.</p> <p>22 <b>A. I think.</b></p> <p>23 Q. What connection had the man, Fenton, got with the Cherry</p> <p>24 Tree, to your knowledge?</p> <p>25 <b>A. Not too sure.</b></p> <p style="text-align: center;">Page 15</p>
<p>1 <b>parked up again to see if we could see anything up there</b></p> <p>2 <b>car-wise, or what, I don't know if he had a car or his</b></p> <p>3 <b>face, in particular.</b></p> <p>4 MR BEER: Can you keep your voice up, please.</p> <p>5 THE CHAIRMAN: Circled round the area and parked up for</p> <p>6 a bit -- I think that's right, is it?</p> <p>7 <b>A. Yes.</b></p> <p>8 THE CHAIRMAN: And then you added something which I couldn't</p> <p>9 hear.</p> <p>10 <b>A. Looking for the vehicle that he thought he had, or</b></p> <p>11 <b>I wasn't too sure.</b></p> <p>12 MR BEER: What vehicle did Mr Grainger think that he had?</p> <p>13 <b>A. I can't remember what it was.</b></p> <p>14 Q. You cannot remember?</p> <p>15 <b>A. No.</b></p> <p>16 Q. But Mr Grainger thought that he, Fenton, had a vehicle?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Where did you go in Culcheth? Can you remember now?</p> <p>19 <b>A. Just drove round the little area of the little village,</b></p> <p>20 <b>it is. We was in and out the car parks at the back of</b></p> <p>21 <b>the --</b></p> <p>22 Q. Did you get out of the car at any time?</p> <p>23 <b>A. I can't remember.</b></p> <p>24 Q. Did Anthony get out of the car at any time?</p> <p>25 <b>A. No, I don't think so, no.</b></p> <p style="text-align: center;">Page 14</p>	<p>1 Q. Do you know why you were parking up in the car park next</p> <p>2 to the back of the Cherry Tree?</p> <p>3 <b>A. Yes, just to see if we could locate this guy.</b></p> <p>4 Q. Do you remember where you parked up in the car park on</p> <p>5 the 29th?</p> <p>6 <b>A. Not too sure on the 29th, no.</b></p> <p>7 Q. You remember the space you parked up in on the 3rd, yes?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Where it was it in relation to that?</p> <p>10 <b>A. Could have been the same spot. I am not sure. I can't</b></p> <p>11 <b>remember.</b></p> <p>12 Q. Do you think, like on the 3rd, you were reversed in,</p> <p>13 pointing outwards?</p> <p>14 <b>A. Possibly, yes.</b></p> <p>15 Q. If that was the case, why were you reversed in, pointing</p> <p>16 outwards?</p> <p>17 <b>A. Just for the same reason.</b></p> <p>18 Q. What was that reason?</p> <p>19 <b>A. Just to try and locate this guy, and see if we could get</b></p> <p>20 <b>any eyes on him.</b></p> <p>21 THE CHAIRMAN: To get eyes on him?</p> <p>22 <b>A. Yes.</b></p> <p>23 MR BEER: If he had some connection with the Cherry Tree</p> <p>24 pub, yes?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 16</p>

<p>1 Q. How were you going to see him from that position, with 2 the car parked up, reversed in, in the last space on the 3 right? 4 <b>A. Just to see if we could see where the car he was in, or 5 anything like that.</b> 6 Q. If Anthony thought he had some connection with the 7 Cherry Tree, why not park up in the Cherry Tree car 8 park? 9 <b>A. Because there is a little gap, a walkway. There's a 10 walkway. We drove in and out of all the car parks 11 around there.</b> 12 Q. By the time that you parked up in the Thompson Avenue, 13 Jackson Avenue car park, you had been in into the 14 Cherry Tree car park? 15 <b>A. I think so, yeah. We drove in and out of the -- there's 16 two separate -- there is a walkway that leads to that 17 car park, as well.</b> 18 Q. There is hedge, isn't there, with a gap in it? 19 <b>A. Yes.</b> 20 Q. Did Anthony get out of the car when it was parked up? 21 <b>A. No, I can't remember.</b> 22 Q. Could you see through the hedge into the Cherry Tree car 23 park? 24 <b>A. No, not -- not a good view, no.</b> 25 Q. Could you see through the gap from where you were parked</p> <p style="text-align: center;">Page 17</p>	<p>1 Q. What do you mean by that, put your "face on offer"? 2 <b>A. I didn't want to -- I -- be seen.</b> 3 Q. Did you return to -- I think it was the Worsley area, in 4 the car? 5 <b>A. Yes.</b> 6 Q. Do you remember walking from the direction of a road 7 called Hazelhurst Road to another one called 8 Beatrice Road and putting something in the back of 9 a silver Audi? 10 <b>A. Yes, I'm not too sure from the -- yeah, I remember 11 the bit of the CCTV, yes.</b> 12 Q. You remember the CCTV from the trial? 13 <b>A. Yes.</b> 14 Q. And the silver Audi, who did it belong to? 15 <b>A. It was a hire car I was using at that time.</b> 16 Q. Can you recall what the object was? 17 <b>A. I think it was a set of reg plates.</b> 18 Q. A set of reg plates? 19 <b>A. From what I can remember, yes.</b> 20 Q. Where had you taken them from, the reg plates? 21 <b>A. From what I remember, it was the old reg plates from out 22 of the Audi, the originals.</b> 23 Q. Which Audi, the red Audi? 24 <b>A. The original ones, yes.</b> 25 Q. Because the red Audi, the S Line, was on false plates?</p> <p style="text-align: center;">Page 19</p>
<p>1 up? 2 <b>A. The gap in the?</b> 3 Q. In the hedge. 4 <b>A. We could see the entrance to it, yes.</b> 5 Q. You could see the entrance to the gap? 6 <b>A. Yes.</b> 7 Q. But you couldn't see into the car park through the gap? 8 <b>A. No.</b> 9 Q. Did you locate the man? 10 <b>A. No.</b> 11 Q. How long did you spend in the car park? 12 <b>A. I am not too sure.</b> 13 Q. Did either you or Anthony go into the Cherry Tree pub? 14 <b>A. No.</b> 15 Q. Why was that if you were looking for the man who it was 16 thought might drink there? 17 <b>A. I didn't want to go in and Anthony didn't want to go in 18 either.</b> 19 Q. Please keep your voice up. 20 <b>A. I didn't want to go in and Anthony didn't want to go in.</b> 21 Q. Why didn't you want to go in? 22 <b>A. I just didn't want to put my face on offer.</b> 23 Q. You didn't want to put your "face on offer", did you 24 say? 25 <b>A. Yes, I didn't want to put my face on offer, yes.</b></p> <p style="text-align: center;">Page 18</p>	<p>1 <b>A. Yes.</b> 2 Q. You think they came from out of the red Audi on that 3 day, and you were putting them in the several Audi, the 4 hire car? 5 <b>A. Yes.</b> 6 Q. Why were you doing that? 7 <b>A. It was just to get rid of them, to get rid of the old 8 plates.</b> 9 Q. What were you intending to do with them? 10 <b>A. From what I remember, I dumped them somewhere.</b> 11 Q. We know that the red Audi had been at least in Anthony's 12 possession for some good time by then. Why was it at 13 this time that the plates were only being disposed of? 14 <b>A. I think they was just found at the time because they had 15 been under in the mat in the back of the car.</b> 16 Q. Under the mat? 17 <b>A. Yes.</b> 18 Q. The police have suggested in this case that you were 19 seen placing a hacksaw in the rear of the silver Audi; 20 did you have a hacksaw with you? 21 <b>A. No. No, there was no need for me to have an hacksaw, 22 no.</b> 23 Q. Sorry, no need? 24 <b>A. There was no need for an hacksaw.</b> 25 Q. Had you, when you had been in Culcheth that night, had</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 a view of the Sainsbury's premises that were there?</p> <p>2 <b>A. Had a view from? The parking spot?</b></p> <p>3 Q. Yes.</p> <p>4 <b>A. Had a view -- not really, no.</b></p> <p>5 Q. Did you know that Sainsbury's was there?</p> <p>6 <b>A. I knew Sainsbury's was there, yes.</b></p> <p>7 Q. What of Sainsbury's could you see when you were parked</p> <p>8 up?</p> <p>9 <b>A. Not much. I know it had an entrance to the back end of</b></p> <p>10 <b>the car park.</b></p> <p>11 Q. Could you see the metal gate at the rear of Sainsbury's?</p> <p>12 <b>A. No.</b></p> <p>13 Q. I am going to move on to 1 March, please.</p> <p>14 Did you go to Culcheth the following night, on</p> <p>15 Thursday 1 March?</p> <p>16 <b>A. On the 1st? Is that the Friday night?</b></p> <p>17 Q. No, that is the Thursday night.</p> <p>18 <b>A. Yes, I think I did on Thursday, yes.</b></p> <p>19 Q. Yes. The evidence you have given before is that you</p> <p>20 went the Wednesday night we have just spoken about, the</p> <p>21 Thursday night --</p> <p>22 <b>A. The 29th. The 29th, yes.</b></p> <p>23 Q. -- that we are now speaking about, the 1st?</p> <p>24 <b>A. Yes, the 1st, yes.</b></p> <p>25 Q. You didn't go on the Friday night, and then you went on</p> <p style="text-align: center;">Page 21</p>	<p>1 <b>A. Yes.</b></p> <p>2 MR BEER: If that was the case, why were you in the car park</p> <p>3 that was behind the pubs and bars of that area?</p> <p>4 <b>A. Same reasons, we were checking for his car, whatever car</b></p> <p>5 <b>he was driving, so we would know if it was a new car and</b></p> <p>6 <b>see if he was mooching about.</b></p> <p>7 Q. When you gave evidence at Manchester Crown Court, you</p> <p>8 said that Anthony Grainger told you that he thought the</p> <p>9 man was driving a white Mercedes, I think, on a 2010</p> <p>10 registration plate?</p> <p>11 <b>A. Yes, it might have been.</b></p> <p>12 Q. You don't remember now what he had told you?</p> <p>13 <b>A. I have not actually gone back through all them</b></p> <p>14 <b>statements but, yes, I can't remember.</b></p> <p>15 Q. If it was suspected that he might drink in the</p> <p>16 Cherry Tree, why didn't you park up in the Cherry Tree</p> <p>17 car park?</p> <p>18 <b>A. We did drive into the Cherry Tree as well, in and out</b></p> <p>19 <b>from what I remember. We drove in -- there was a couple</b></p> <p>20 <b>of car parks we drove in and out of.</b></p> <p>21 Q. Did you locate the man on 1 March?</p> <p>22 <b>A. No.</b></p> <p>23 Q. You didn't go out to Culcheth on Friday, 2 March?</p> <p>24 <b>A. No, not that I remember.</b></p> <p>25 Q. But we know that Mr Grainger did so. Did you know that</p> <p style="text-align: center;">Page 23</p>
<p>1 the Saturday?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Again, what was the reason for your visit on the</p> <p>4 1 March?</p> <p>5 <b>A. The same as the previous times.</b></p> <p>6 Q. Was it the two of you again, or was either Robert Rimmer</p> <p>7 or Joseph Travers involved on this occasion?</p> <p>8 <b>A. I can't remember. I am not too sure who was there that</b></p> <p>9 <b>night.</b></p> <p>10 Q. What did you do when you went to Culcheth on the</p> <p>11 Thursday, 1 March?</p> <p>12 <b>A. Same again, drove about, parked up in the car parks.</b></p> <p>13 <b>Just done the same thing again.</b></p> <p>14 Q. Did anyone get out of the car?</p> <p>15 <b>A. No, not that I remember, no.</b></p> <p>16 Q. Why did you again park up in the same car park?</p> <p>17 <b>A. For the same reasons, as previous.</b></p> <p>18 Q. The same reasons for nobody going into the Cherry Tree?</p> <p>19 <b>A. Yes. It was basically mostly -- there was -- there's</b></p> <p>20 <b>information was -- what I remember was it was the pubs</b></p> <p>21 <b>and bars around that (Inaudible) area.</b></p> <p>22 Q. Say that again and keep your voice up, please.</p> <p>23 <b>A. The pubs and bars around that area.</b></p> <p>24 THE CHAIRMAN: It was not just the Cherry Tree, it was the</p> <p>25 pubs and bars around that area?</p> <p style="text-align: center;">Page 22</p>	<p>1 Mr Grainger intended to go to Culcheth on Friday,</p> <p>2 2 March?</p> <p>3 <b>A. No, I can't remember.</b></p> <p>4 Q. After he had been, did you know that he had gone? So on</p> <p>5 the Saturday, the 3rd, did he say that he had been the</p> <p>6 previous night?</p> <p>7 <b>A. Yes, I think so, yes.</b></p> <p>8 Q. Why didn't you go on that occasion?</p> <p>9 <b>A. I can't remember why I didn't go that day but, yes, he</b></p> <p>10 <b>told me the next day that he was up there on the Friday.</b></p> <p>11 <b>He was looking about.</b></p> <p>12 Q. Did you know that Mr Grainger had also gone to Culcheth</p> <p>13 in the stolen Audi, on the 27th, which would have been</p> <p>14 the Monday?</p> <p>15 <b>A. I am not sure. I can't remember about that.</b></p> <p>16 Q. Turning then to Saturday, the 3rd, what telephone</p> <p>17 contact did you have with Mr Grainger and Mr Rimmer or</p> <p>18 Mr Travers on the Saturday?</p> <p>19 <b>A. I will have spoke to Anthony and -- I would probably</b></p> <p>20 <b>have spoke to all four of them that day.</b></p> <p>21 Q. All four of them? I mentioned three people.</p> <p>22 <b>A. Yeah, I know what you mean, yes.</b></p> <p>23 Q. Was there a fourth person?</p> <p>24 <b>A. No, not a fourth person, no.</b></p> <p>25 Q. What would you have spoken to the three of them about,</p> <p style="text-align: center;">Page 24</p>

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<p>1 then?</p> <p>2 <b>A. I spoke to Anthony about going back up to Culcheth on</b></p> <p>3 <b>Saturday.</b></p> <p>4 Q. Was it him calling you or you calling him?</p> <p>5 <b>A. I can't remember.</b></p> <p>6 Q. Similarly, in relation to Mr Rimmer and Mr Travers, did</p> <p>7 you speak to them about going up to Culcheth on the</p> <p>8 Saturday?</p> <p>9 <b>A. Yes, I asked Joey if he wanted to come up with us.</b></p> <p>10 Q. And what about Robert?</p> <p>11 <b>A. I can't remember about Robert.</b></p> <p>12 Q. So how did it come about that you met up in the Audi,</p> <p>13 the three of you; you, Joey and Mr Grainger?</p> <p>14 <b>A. I can't remember if I was picked up or not. I think</b></p> <p>15 <b>Anthony might have come and picked me up.</b></p> <p>16 Q. What was the purpose of the visit to Culcheth on that</p> <p>17 day?</p> <p>18 <b>A. Same as the previous times.</b></p> <p>19 Q. To try and find the man?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Can you remember what route you took to get from</p> <p>22 Boothtown to Culcheth?</p> <p>23 <b>A. No. Went up the East Lincs, that way.</b></p> <p>24 Q. You went on the East Lincs; the A580?</p> <p>25 <b>A. From what I remember that's the way.</b></p> <p style="text-align: center;">Page 25</p>	<p>1 <b>A. There is a back fence into the back, where there's</b></p> <p>2 <b>buildings into the back; pubs and bars.</b></p> <p>3 Q. A suggestion has been made in the Inquiry that the</p> <p>4 vehicle was parked like that so as to give immediate and</p> <p>5 straight access out of the car park, so you could drive</p> <p>6 speedily away from the parking spot; was that the reason</p> <p>7 for parking up in that way?</p> <p>8 <b>A. I wouldn't say that, no.</b></p> <p>9 Q. A suggestion has been made that it is so that you could</p> <p>10 have a good view of the Sainsbury's premises; could you</p> <p>11 see the Sainsbury's premises from there?</p> <p>12 <b>A. Not really, no. It was dark.</b></p> <p>13 Q. Where were you sitting in the car when it was parked up?</p> <p>14 <b>A. I was in the passenger seat.</b></p> <p>15 Q. And was Anthony in the driver's seat?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Where was Mr Travers?</p> <p>18 <b>A. I think Mr Travers was in the back, drivers -- back</b></p> <p>19 <b>driver's seat.</b></p> <p>20 Q. Sitting behind Mr Grainger, not behind you?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Can you now recall what the area around you was like?</p> <p>23 So if you imagine yourself sitting in the car, to your</p> <p>24 right-hand side, so Anthony Grainger's side, what was</p> <p>25 down that side?</p> <p style="text-align: center;">Page 27</p>
<p>1 Q. We have some evidence in the Inquiry that when the</p> <p>2 vehicle entered Culcheth, at one point, when it was on</p> <p>3 Church Lane, it did a U-turn and came back on itself,</p> <p>4 can you remember what that was for; why it did that?</p> <p>5 <b>A. No. I can not remember about that.</b></p> <p>6 Q. Did you end up in the car park again?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Again, what was the purpose of going to the car park?</p> <p>9 <b>A. For the same reason, if we could locate this guy.</b></p> <p>10 Q. Why did Anthony reverse park the vehicle?</p> <p>11 <b>A. Just to plot up in the corner of the car park,</b></p> <p>12 <b>I suppose.</b></p> <p>13 Q. To plot up?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. If you were looking for the man and you parked facing</p> <p>16 in, what would you have been able to see?</p> <p>17 <b>A. Say that again?</b></p> <p>18 Q. If you had been looking for the man and you were facing</p> <p>19 in, as you naturally drove into the parking spot, what</p> <p>20 would you have been able to see?</p> <p>21 <b>A. Go the way in forwards, you mean?</b></p> <p>22 Q. Yes.</p> <p>23 <b>A. What I gather is there's this back fence into the</b></p> <p>24 <b>buildings.</b></p> <p>25 Q. Keep your voice up, please?</p> <p style="text-align: center;">Page 26</p>	<p>1 <b>A. There was a bush down that side.</b></p> <p>2 Q. A bush?</p> <p>3 <b>A. A bush leading along to the entrance of the next car</b></p> <p>4 <b>park.</b></p> <p>5 Q. And what was to your rear?</p> <p>6 <b>A. There was fencing to the rear, with buildings at the</b></p> <p>7 <b>back.</b></p> <p>8 Q. When you parked up, what was to your left-hand side, so</p> <p>9 the nearside of the Audi?</p> <p>10 <b>A. More cars parked up.</b></p> <p>11 Q. When you parked up, how many cars were on the car park,</p> <p>12 approximately?</p> <p>13 <b>A. I would say about 10 to 12, 15 or something.</b></p> <p>14 Q. Was there a car in the space when you parked up,</p> <p>15 immediately to your left-hand side?</p> <p>16 <b>A. Yes, I think there might have been, yes.</b></p> <p>17 Q. Did that stay there or did that leave?</p> <p>18 <b>A. No, yes, I think -- from what I remember, yes, someone</b></p> <p>19 <b>come.</b></p> <p>20 Q. Could you keep your voice up, please.</p> <p>21 <b>A. Yes, some people turned up and got in it and drove away.</b></p> <p>22 Q. Was there a car in the next but one space?</p> <p>23 <b>A. Yes, I think so.</b></p> <p>24 Q. For how long were you on the car park, between arriving</p> <p>25 and the time that you now know to be police officers?</p> <p style="text-align: center;">Page 28</p>

<p>1 turned up?</p> <p>2 <b>A. 15 minutes, 20 minutes, something like that. I'm not</b></p> <p>3 <b>sure.</b></p> <p>4 Q. In your statement, I think you said it was about half</p> <p>5 an hour, and when you gave evidence you said it was</p> <p>6 about half an hour.</p> <p>7 <b>A. About 20 minutes, 30 minutes, yes.</b></p> <p>8 Q. 20 or 30 minutes?</p> <p>9 <b>A. 20 or 30 minutes, yes.</b></p> <p>10 Q. What did you do in that time?</p> <p>11 <b>A. Sat there waiting.</b></p> <p>12 Q. When you pulled up initially, did Anthony leave the</p> <p>13 engine on?</p> <p>14 <b>A. I think it might have been turned off, I am not sure.</b></p> <p>15 Q. Did the engine stay off or did it come back on?</p> <p>16 <b>A. Yes, I think it kept coming -- yes, we put it back on.</b></p> <p>17 <b>I remember the windows heating up.</b></p> <p>18 Q. So you remember the windows heating up?</p> <p>19 <b>A. Heating up, yes. Once the engine was off so ...</b></p> <p>20 Q. The engine was turned on for the fan circulation?</p> <p>21 <b>A. Yes, for the fan to be turned back on, yes.</b></p> <p>22 Q. I'm moving forward now. When the police officers turned</p> <p>23 up as you know them to be now, was the engine on or off</p> <p>24 at that stage?</p> <p>25 <b>A. I think it might have been off at that time, yes.</b></p> <p style="text-align: center;">Page 29</p>	<p>1 <b>A. I think he might have had his seat belt on, yes. I know</b></p> <p>2 <b>I took mine off, I can't remember about his.</b></p> <p>3 Q. You can't remember whether he took his off or not?</p> <p>4 <b>A. I think mine was off, yes.</b></p> <p>5 Q. You think it might have been off?</p> <p>6 <b>A. Yes, mine was off, yes.</b></p> <p>7 Q. Sorry --</p> <p>8 THE CHAIRMAN: He says he thinks his was off but he is not</p> <p>9 sure about Anthony Grainger's.</p> <p>10 MR BEER: I see.</p> <p>11 Was the radio of the car on at any point?</p> <p>12 <b>A. Yes, I think it was on, yes.</b></p> <p>13 Q. When you were parked up?</p> <p>14 <b>A. I think so, yes. I don't know.</b></p> <p>15 Q. You say in your statement that it may have been on, if</p> <p>16 it was on, it was on low.</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Did that remain the case whilst you were parked up?</p> <p>19 <b>A. From what I remember, yes.</b></p> <p>20 Q. Up and including the point when the police officers</p> <p>21 turned up?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. How long did you intend to stay on the car park?</p> <p>24 <b>A. I think not much longer than what we was there for.</b></p> <p>25 Q. Why was that?</p> <p style="text-align: center;">Page 31</p>
<p>1 Q. At any stage, was the interior light on the car or</p> <p>2 lights on the car on? You know, the courtesy lights</p> <p>3 inside?</p> <p>4 <b>A. No, I don't think so.</b></p> <p>5 Q. You don't think so?</p> <p>6 <b>A. No, they would only be on if the door was open, I think.</b></p> <p>7 Q. Can you say that again.</p> <p>8 <b>A. I think they would only come on if the door was open.</b></p> <p>9 Q. Right.</p> <p>10 When Anthony Grainger parked the car up, did the</p> <p>11 exterior lights remain on; the front lights and the rear</p> <p>12 lights?</p> <p>13 <b>A. No, I think they would have been turned off.</b></p> <p>14 Q. Did they stay off or did they come on at any stage?</p> <p>15 <b>A. They might have come back on when the car was turned on</b></p> <p>16 <b>but, apart from that, no I think they was off most of</b></p> <p>17 <b>the time.</b></p> <p>18 Q. Did you wear a seat belt for the journey?</p> <p>19 <b>A. Yeah, I will have done, yes.</b></p> <p>20 Q. Did you keep that on when you parked up?</p> <p>21 <b>A. No, I am not sure.</b></p> <p>22 Q. You are not sure?</p> <p>23 <b>A. I might have took it off, yes.</b></p> <p>24 Q. What about Anthony, did he wear a seat belt as far as</p> <p>25 you can remember?</p> <p style="text-align: center;">Page 30</p>	<p>1 <b>A. To give it an amount of time and then we would have</b></p> <p>2 <b>left, like all the previous nights, give it an hour or</b></p> <p>3 <b>so.</b></p> <p>4 Q. Did anyone get out of the car at any point?</p> <p>5 <b>A. Not that I can remember.</b></p> <p>6 Q. Why not? If the purpose was to look for a man, why</p> <p>7 didn't anyone get out?</p> <p>8 <b>A. We was looking more for the car than the man. Wanted to</b></p> <p>9 <b>see if the car turned up.</b></p> <p>10 Q. Why did you think it might turn up on that car park?</p> <p>11 <b>A. I am not too sure why. I can't -- just thought it might</b></p> <p>12 <b>have been pulling up on that car park.</b></p> <p>13 Q. There are other car parks in Culcheth, aren't there?</p> <p>14 <b>A. We went to quite a few car parks, in and out, the nights</b></p> <p>15 <b>we was up there.</b></p> <p>16 Q. Did you park up on those other car parks or just drive</p> <p>17 in and out of them?</p> <p>18 <b>A. Drive in and out of them.</b></p> <p>19 Q. Why did you therefore park up on this car park?</p> <p>20 <b>A. It was the one we felt comfortable in.</b></p> <p>21 Q. Why did you feel comfortable in that one?</p> <p>22 <b>A. Because we could get into that corner space, I suppose.</b></p> <p>23 <b>Get into the end of the car park.</b></p> <p>24 Q. What was good about the corner space?</p> <p>25 <b>A. Because it was the end space, and we could get to see</b></p> <p style="text-align: center;">Page 32</p>



<p>1 <b>what was coming in and out of the car park.</b></p> <p>2 Q. I think it is right that you couldn't see from the</p> <p>3 position you were in into the Cherry Tree car park?</p> <p>4 <b>A. No, just the entrance. Then --</b></p> <p>5 Q. Just the gap in the hedge?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Why didn't at least Anthony get out and look for the man</p> <p>8 in the car park?</p> <p>9 <b>A. I'm not sure.</b></p> <p>10 Q. I think at one point a car entered the car park; is that</p> <p>11 right? That was noticeable to you.</p> <p>12 <b>A. Oh right, yes. On the 3rd, yes. I remember a BMW 1</b></p> <p>13 <b>Series.</b></p> <p>14 Q. A BMW coming onto the car park. Where did that drive,</p> <p>15 can you remember?</p> <p>16 <b>A. Parked up in front of us, that.</b></p> <p>17 Q. Parked up in front of you. Was there just one person in</p> <p>18 it?</p> <p>19 <b>A. Yes, from what I remember. Yes, one person.</b></p> <p>20 Q. Was that a man or a woman?</p> <p>21 <b>A. A man.</b></p> <p>22 Q. Did he get out of the car?</p> <p>23 <b>A. Yes, he got out of the car, yes.</b></p> <p>24 Q. What did he do?</p> <p>25 <b>A. He walked off, to the back of the car park.</b></p> <p style="text-align: center;">Page 33</p>	<p>1 Q. What I am getting at is: was the adjustment that he was</p> <p>2 making enable him to see you or see something else?</p> <p>3 <b>A. No, he didn't turn it round so he could see us. Where</b></p> <p>4 <b>he could have seen, it was still facing to the back of</b></p> <p>5 <b>the car.</b></p> <p>6 Q. In any event, he left the car park; is that right? He</p> <p>7 walked off?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. What sort of gap is there between him walking off and</p> <p>10 what you now know to be the first police car arriving?</p> <p>11 <b>A. If I remember, a couple of minutes. I'm not sure.</b></p> <p>12 Q. In your statement you say:</p> <p>13 "He left the car park around three to four minutes</p> <p>14 before the police arrived."</p> <p>15 Does that sound right?</p> <p>16 <b>A. Yes, could be, yes.</b></p> <p>17 Q. What was the next relevant thing that happened?</p> <p>18 <b>A. So a couple of minutes after that, I can hear the engine</b></p> <p>19 <b>of a car speeding up. And then pulls -- the car</b></p> <p>20 <b>screeches up in front of us. As it stopped, or before</b></p> <p>21 <b>it stopped, the -- I have heard the sound.</b></p> <p>22 Q. The sound of?</p> <p>23 <b>A. I have heard a bang, a loud bang. And I remember</b></p> <p>24 <b>feeling glass. Those were shards of glass hitting my</b></p> <p>25 <b>face.</b></p> <p style="text-align: center;">Page 35</p>
<p>1 Q. He walked off, did he?</p> <p>2 In your statement, you say:</p> <p>3 "There was a fella in that car and he was messing</p> <p>4 around with his wing mirror, and then he got out of his</p> <p>5 car and he walked off."</p> <p>6 Is that accurate?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Just describe what he was doing with his wing mirror?</p> <p>9 <b>A. He just seemed to be -- yes, I remember seeing his hand</b></p> <p>10 <b>up and he was messing about with the wing mirror, moving</b></p> <p>11 <b>it about.</b></p> <p>12 Q. Do you say the "wing mirror" do you mean the rear view</p> <p>13 mirror, on the inside?</p> <p>14 THE CHAIRMAN: On the inside?</p> <p>15 <b>A. Inside, yes.</b></p> <p>16 MR BEER: So not the wing mirrors, the interior mirror?</p> <p>17 <b>A. Yes, the inside, interior mirror. Wing --</b></p> <p>18 MR BEER: Did you think anything of what he was doing?</p> <p>19 <b>A. No, not really.</b></p> <p>20 Q. What drew your attention to him?</p> <p>21 <b>A. I just remember him pulling up. It was quiet. He was</b></p> <p>22 <b>a couple of cars in front, facing.</b></p> <p>23 Q. Was the adjustment of the rear view mirror to be able to</p> <p>24 see something else or to be able to see you?</p> <p>25 <b>A. I am not too sure what he was doing.</b></p> <p style="text-align: center;">Page 34</p>	<p>1 <b>Then after that, I realised -- well, I thought -- at</b></p> <p>2 <b>the time, I thought it was -- I didn't know what it was,</b></p> <p>3 <b>but I thought it could have been a bullet. A shot of</b></p> <p>4 <b>a gun.</b></p> <p>5 <b>I realised car's not going anywhere because it had</b></p> <p>6 <b>been blocked in. Then I go to get out of the car and</b></p> <p>7 <b>I get out of the car, and as I am getting out of the car</b></p> <p>8 <b>I start to hear a lot of shouting and screaming.</b></p> <p>9 Q. Stop there, I am going to take you back over that a bit</p> <p>10 more slowly.</p> <p>11 You said that you heard the sound of a car?</p> <p>12 <b>A. Heard the sound of a car, yes. Engine.</b></p> <p>13 Q. Can you describe the sound of the car?</p> <p>14 <b>A. Yes, it was the sound of a car speeding up in first</b></p> <p>15 <b>gear.</b></p> <p>16 Q. At the point when you heard the sound of the car</p> <p>17 speeding up as if it was in first gear, did you look</p> <p>18 towards it?</p> <p>19 <b>A. Yes, I was looking towards there.</b></p> <p>20 Q. Were you looking towards that direction anyway?</p> <p>21 <b>A. As I heard it come screeching up, talking, yes.</b></p> <p>22 Q. You were looking to your left-hand side; is that right?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. At that point, did you realise that it was a police car</p> <p>25 or contained police officers?</p> <p style="text-align: center;">Page 36</p>

<p>1 <b>A. No, not at that time, no.</b></p> <p>2 Q. What were you doing at that time?</p> <p>3 <b>A. I was sat in the car.</b></p> <p>4 Q. When the car came screeching up, did you see whether</p> <p>5 Anthony did anything?</p> <p>6 <b>A. No, not at the time, no.</b></p> <p>7 Q. You didn't see whether he did anything, or he didn't do</p> <p>8 anything?</p> <p>9 <b>A. Obviously, we -- well, as we have heard the noise of the</b></p> <p>10 <b>car and the car pulling up in front of us, we have</b></p> <p>11 <b>all -- I suggest that we have all jumped to see what</b></p> <p>12 <b>was -- obviously, being blocked in --</b></p> <p>13 MR THOMAS: Sorry, sir, I can't hear.</p> <p>14 THE CHAIRMAN: "We all jumped to see what it was."</p> <p>15 MR BEER: You say in your statement that Anthony jumped to</p> <p>16 attention, he looked in the direction of the car.</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. And did you all do that?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. It pulled up in front of you; is that right?</p> <p>21 <b>A. It pulled up right in front of us, yes.</b></p> <p>22 Q. Did you feel any contact between it and the car that you</p> <p>23 were in?</p> <p>24 <b>A. I am not too sure at the time, no.</b></p> <p>25 Q. Keep your voice up, please.</p> <p style="text-align: center;">Page 37</p>	<p>1 <b>pinned down.</b></p> <p>2 Q. That was the first time that you realised for sure that</p> <p>3 it was the police?</p> <p>4 <b>A. Hmm.</b></p> <p>5 Q. When the car pulled in front of you, what happened then?</p> <p>6 <b>A. As the car pulled up, within -- well, just as it pulled</b></p> <p>7 <b>up, before even probably, just as it stopped, and then</b></p> <p>8 <b>that is when I felt the shards of glass in my face.</b></p> <p>9 Q. Before the shards of glass, feeling shards of glass in</p> <p>10 your face, did you see anything in the car, in the</p> <p>11 police car as you know it to be now?</p> <p>12 <b>A. No, not that I can remember, no. From what I remember,</b></p> <p>13 <b>it had lights. There was lights coming in.</b></p> <p>14 Q. Okay. Can you remember where the lights were coming</p> <p>15 from?</p> <p>16 <b>A. It was coming from the back end of the car, I think.</b></p> <p>17 Q. And what kind of light was it?</p> <p>18 <b>A. Torchlight or something.</b></p> <p>19 Q. A torchlight?</p> <p>20 <b>A. Yes, I think.</b></p> <p>21 Q. And where was it shining?</p> <p>22 <b>A. Shining into -- I could see it shining into my face.</b></p> <p>23 Q. You say in your statement:</p> <p>24 "I remember seeing a light at the back end of the</p> <p>25 silver car which prevented me from seeing anything."</p> <p style="text-align: center;">Page 39</p>
<p>1 <b>A. I am not too sure, no.</b></p> <p>2 Q. In your statement, you say:</p> <p>3 "Although it was close, there was no contact with</p> <p>4 our car."</p> <p>5 <b>A. Yes, I can remember now. I can't remember no contact.</b></p> <p>6 Q. Is that likely to be accurate, what you said at the</p> <p>7 time?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. What did you think was going on at the point at which</p> <p>10 you heard this car, as if it was in first gear, pull up</p> <p>11 in front of you and effectively block you in? What did</p> <p>12 you think was going on?</p> <p>13 <b>A. At that point, I wasn't too sure what was happening.</b></p> <p>14 Q. Did you think it may have been a police car?</p> <p>15 <b>A. At the time, it was possible. I wasn't too sure at that</b></p> <p>16 <b>actual time.</b></p> <p>17 Q. You say in your statement:</p> <p>18 "I assumed that it could have been the police but</p> <p>19 I didn't know for sure."</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Is that accurate?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Why did you assume that it could have been the police?</p> <p>24 <b>A. Just the fact we were in a stolen car maybe.</b></p> <p>25 <b>I realised that it was police when I was being</b></p> <p style="text-align: center;">Page 38</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. Is that right, that it prevented you from seeing?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. When you say, "Prevented me from seeing anything", do</p> <p>5 you mean seeing anything in the silver car?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Rather than preventing you from seeing at all?</p> <p>8 <b>A. Well, from -- yes, from what I gather, I remember the</b></p> <p>9 <b>car pulling up. As it pulled up, then I remember the</b></p> <p>10 <b>bang and the shards on my face.</b></p> <p>11 Q. Whereabouts on your face did you feel the shards of</p> <p>12 glass?</p> <p>13 <b>A. I felt them coming towards my cheek.</b></p> <p>14 THE CHAIRMAN: You are indicating your right cheek.</p> <p>15 <b>A. This side. My right-hand side it is, right-hand side.</b></p> <p>16 MR BEER: You have said a couple of times today that you</p> <p>17 heard a bang.</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. And that you heard a shot.</p> <p>20 <b>A. A crackle, yes.</b></p> <p>21 Q. A crack or a crackle.</p> <p>22 <b>A. A crackle, yes.</b></p> <p>23 Q. In your statement, you say:</p> <p>24 "I did feel quite a force on the right side of my</p> <p>25 face, on my cheek, from the shards of glass. I don't</p> <p style="text-align: center;">Page 40</p>

<p>1 remember hearing anything before the shards of glass hit 2 my face." 3 So, at the time you made the statement, which was 4 quite shortly after these events, you didn't remember 5 hearing anything and today you told us you have heard 6 a bang or a shot or a crackle. 7 <b>A. I have heard a crackle, yes.</b> 8 Q. If that is right, why didn't you say that in the 9 statement here? 10 <b>A. Is that the IPCC statement?</b> 11 Q. Yes. 12 <b>A. Yes. At that time, I was a bit -- things were a bit</b> 13 <b>uncomfortable because I was still going on trial for,</b> 14 <b>well, what I was on trial for.</b> 15 Q. You felt a bit on comfortable because you were standing 16 trial for the conspiracy to rob allegation? 17 <b>A. Yes.</b> 18 Q. But you gave a, if I may say so, a very full account to 19 the IPCC. 20 <b>A. Yes.</b> 21 Q. And saying whether or not you heard a shot, or a crackle 22 or a bang, how would that make you feel less 23 comfortable? Do you see what I mean? 24 <b>A. I know what you mean, yes. I was a bit uncomfortable at</b> 25 <b>that time because I was still going on trial, so ...</b></p> <p style="text-align: center;">Page 41</p>	<p>1 Q. Do you specifically remember a police officer shouting, 2 "Armed police, put your hands up"? 3 <b>A. No, I remember him telling me not to move, "Don't move,</b> 4 <b>don't move".</b> 5 Q. I am talking about before the shards of glass and the 6 sound; did you hear any shout like that? 7 <b>A. No, not at that time.</b> 8 Q. When the car pulled up, and you saw the light, where 9 were you looking towards? 10 <b>A. I was looking straight on. Straight on in front of me.</b> 11 Q. What view of Mr Grainger did you have at that time? 12 <b>A. I was -- yes, I was concentrating on looking forward at</b> 13 <b>that time.</b> 14 Q. Could you see what Mr Grainger was doing or was not 15 doing? 16 <b>A. At the time -- at the time, no. At the time I was</b> 17 <b>looking forward, no.</b> 18 Q. So could you tell us whether or not he had his hands up 19 or down? 20 <b>A. No, not at that time. Because what has happened was, as</b> 21 <b>I felt the shards of glass and I am looking towards him,</b> 22 <b>then I am realising that the car is not going anywhere,</b> 23 <b>so I am out of the car.</b> 24 MR THOMAS: Sorry, sir. 25 MR BEER: Can you just --</p> <p style="text-align: center;">Page 43</p>
<p>1 Q. Okay. Before you felt the shards of glass in your 2 face -- 3 <b>A. Yes.</b> 4 Q. -- and, as you have now said, the sound that preceded 5 it, did you put your hands up? 6 <b>A. No.</b> 7 Q. Did you see whether Mr Grainger put his hands up? 8 <b>A. No.</b> 9 <b>After the shards of glass, I more or less -- after</b> 10 <b>I felt the shards of glass in my face, I more or less</b> 11 <b>left the car.</b> 12 Q. Just keep your voice up again, please. 13 <b>A. After I got the shards, as soon as that happened, more</b> 14 <b>or less, I was out of the car then.</b> 15 Q. Before you felt the shards of glass, do you remember 16 anyone outside the car shouting anything? 17 <b>A. Not at that time, no. First -- when I remember the</b> 18 <b>first time -- the first bit of shouting was when I am</b> 19 <b>scrambling to the back of the car. So I've slipped as</b> 20 <b>I'm coming out of the car, and that is when it all --</b> 21 <b>that's when I started hearing it all, all the shouting</b> 22 <b>and that.</b> 23 Q. So that was when you were on the floor at the rear end 24 of the car, outside it? 25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 42</p>	<p>1 THE CHAIRMAN: "I realised the car was not going anywhere, 2 so I was out of the car"; is that right? 3 <b>A. Yes.</b> 4 MR BEER: So is it right that between the car pulling up and 5 you getting out of the passenger door, you didn't look 6 at Mr Grainger? 7 <b>A. I looked to see -- yeah, I looked round to see what he</b> 8 <b>was doing after that.</b> 9 Q. And the "after that" is after the shards of glass? 10 <b>A. Yes, and then --</b> 11 Q. What was he doing then? 12 <b>A. He was just still sat in the car. As I've done that, I</b> 13 <b>have turned. Within a split second of that, I have,</b> 14 <b>more or less, gone to get out of the car. And he is</b> 15 <b>still in the car at the time.</b> 16 Q. I think you know that a recording was made. You now 17 know a recording was made covertly of a conversation 18 that you had with Mr Schofield, on 23 March 2012, when 19 you were in prison, yes? 20 <b>A. Yes.</b> 21 Q. You have seen a transcript -- 22 <b>A. I have only seen that this morning, yes.</b> 23 Q. Yes. 24 Mr Schofield asked you: 25 "Did Anthony, did Anthony have his hands raised or</p> <p style="text-align: center;">Page 44</p>

<p>1 anything?"</p> <p>2 You answered:</p> <p>3 "Well, it would have been -- well, I am not too sure</p> <p>4 because I am looking at the thing, obviously. But he</p> <p>5 would have put them up, wouldn't he."</p> <p>6 Yes?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. So you say there, "It would have been", ie Anthony would</p> <p>9 have had his hands raised. Then you say:</p> <p>10 "I am not too sure because I am looking at the</p> <p>11 thing."</p> <p>12 What did you mean "Because I am looking at the</p> <p>13 thing"?</p> <p>14 <b>A. I am looking at the car in front.</b></p> <p>15 Q. Then, you say:</p> <p>16 "Obviously, but he would have put them up, wouldn't</p> <p>17 he?"</p> <p>18 Why do you say that he would have put his hands up?</p> <p>19 <b>A. I am not too sure. I didn't even -- the car wasn't</b></p> <p>20 <b>started. He wouldn't have gone to start the car, maybe.</b></p> <p>21 <b>I am not too sure.</b></p> <p>22 Q. You didn't say that when you were speaking to</p> <p>23 Mr Schofield. You said, "I am looking at the thing,</p> <p>24 obviously".</p> <p>25 <b>A. What I meant by that -- you know, what I meant by that,</b></p> <p style="text-align: center;">Page 45</p>	<p>1 <b>would have took that phone call off me.</b></p> <p>2 Q. That is because they would know you were then talking to</p> <p>3 somebody else, not the person you booked the call with?</p> <p>4 <b>A. Yes, I mean, basically, it is stated that if anyone</b></p> <p>5 <b>asks -- I can only speak to specific people who I give</b></p> <p>6 <b>the names in for, so anyone else who would have got on</b></p> <p>7 <b>the phone wouldn't have been allowed to speak to me, at</b></p> <p>8 <b>that time.</b></p> <p>9 Q. You say here:</p> <p>10 "They will listen to the call anyway, so they will</p> <p>11 just cut it off."</p> <p>12 <b>A. Yes, because if anyone else was to come on that phone,</b></p> <p>13 <b>apart from the guy who I put in -- I had to give</b></p> <p>14 <b>a listing, you see. So when I give that listing, there</b></p> <p>15 <b>is only that people who I am allowed to speak to.</b></p> <p>16 Q. Did you know, that the authorities would be</p> <p>17 listening to the call, affect what you were saying to</p> <p>18 Mr Schofield?</p> <p>19 <b>A. Yes, because I was on trial at the time, so I didn't</b></p> <p>20 <b>want to say too much.</b></p> <p>21 Q. In particular, did it affect what you said about the</p> <p>22 events in the car park?</p> <p>23 <b>A. It would have been limited to what I would have said,</b></p> <p>24 <b>yes.</b></p> <p>25 Q. What did you miss out of your account then, to him?</p> <p style="text-align: center;">Page 47</p>
<p>1 <b>when he -- at the actual time when he jumped to</b></p> <p>2 <b>attention, as he jumped to attention and seen the car,</b></p> <p>3 <b>he would have -- when he would have been sat back, he</b></p> <p>4 <b>would have been relaxed and then he would have, as the</b></p> <p>5 <b>car was pulling up, he would have come to attention to</b></p> <p>6 <b>see what the car was doing at that time.</b></p> <p>7 Q. I think when you had this conversation with</p> <p>8 Mr Schofield, you suspected that the authorities would</p> <p>9 be listening to the call.</p> <p>10 <b>A. They would have been listening to the call? What?</b></p> <p>11 Q. I think when this recording was made --</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. -- we can see that from some of the things that you say</p> <p>14 in it, you suspected that the authorities may have been</p> <p>15 listening to it?</p> <p>16 <b>A. Yes, all phone calls are recorded.</b></p> <p>17 Q. You tell Mr Schofield not to speak about a topic because</p> <p>18 you say:</p> <p>19 "They will cut my phone off."</p> <p>20 Yes?</p> <p>21 <b>A. What I meant by that, there was only certain people who</b></p> <p>22 <b>was allowed -- because where I was on the unit in</b></p> <p>23 <b>Strangeways and you had to give specific phone numbers</b></p> <p>24 <b>in and specific people who could talk on that phone. So</b></p> <p>25 <b>if he was to pass that phone over to somebody else, they</b></p> <p style="text-align: center;">Page 46</p>	<p>1 <b>A. What do you mean?</b></p> <p>2 Q. You said that it would have been limited, you wouldn't</p> <p>3 have wanted to say too much.</p> <p>4 <b>A. Yes, because I was on trial at the time, and there was</b></p> <p>5 <b>certain things that I didn't want to -- you know, that</b></p> <p>6 <b>I wouldn't have put out at that time, until I got to</b></p> <p>7 <b>trial.</b></p> <p>8 Q. What were they?</p> <p>9 <b>A. Whatever I said in my -- whatever I have said at the</b></p> <p>10 <b>trial.</b></p> <p>11 Q. Okay.</p> <p>12 Going back to the scene then --</p> <p>13 <b>A. All right.</b></p> <p>14 Q. -- you said you didn't put your hands up at any time --</p> <p>15 <b>A. No.</b></p> <p>16 Q. -- and you didn't see whether or not Mr Grainger put his</p> <p>17 hands up at any time.</p> <p>18 <b>A. No.</b></p> <p>19 Q. You have told us that you got out of the car; yes?</p> <p>20 <b>A. I was out of the car more or less straight away.</b></p> <p>21 Q. Did you realise that the shards of glass that you felt</p> <p>22 was the windscreen being penetrated by something?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Did you know what it was?</p> <p>25 <b>A. No, not at the time.</b></p> <p style="text-align: center;">Page 48</p>

<p>1 Q. How did you open the door? With which hand?</p> <p>2 <b>A. My right hand.</b></p> <p>3 Q. Your right hand.</p> <p>4 <b>A. If I remember, yes.</b></p> <p>5 Q. So your left hand would have been closest to the door</p> <p>6 handle; yes?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. But you lent across using your right hand; is that</p> <p>9 because you are right-handed?</p> <p>10 <b>A. I am right-handed, yes.</b></p> <p>11 Q. He said, "Yes".</p> <p>12 Where on the door was the door handle?</p> <p>13 <b>A. Same place as a normal handle of a door would be.</b></p> <p>14 Q. You didn't have to pull a button up?</p> <p>15 <b>A. Well, it would have been -- because I have gone for my</b></p> <p>16 <b>right hand, it would have been easier for me to get out</b></p> <p>17 <b>the car and quicker. So I would have been at a head</b></p> <p>18 <b>start to getting out the car.</b></p> <p>19 Q. So it's in the normal place, roughly in the middle of</p> <p>20 the door panel?</p> <p>21 <b>A. Normal place, in the middle, yes.</b></p> <p>22 Q. And where did you go when you got out of the car?</p> <p>23 <b>A. As I got out of the car, I have slipped. I was going to</b></p> <p>24 <b>the back of the car and going to my right.</b></p> <p>25 Q. Before you got out, had you said anything to Anthony?</p> <p style="text-align: center;">Page 49</p>	<p>1 Q. -- to the rear of the car?</p> <p>2 <b>A. I headed backwards.</b></p> <p>3 Q. Did you manage to stand up; you describe in your</p> <p>4 statement not having the chance to run?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. But you scrambled on the floor?</p> <p>7 <b>A. Yes, as I got out of the car I slipped, from what</b></p> <p>8 <b>I remember, and I was scrambling to the back of car. By</b></p> <p>9 <b>the time I got to the back of the car on the -- to the</b></p> <p>10 <b>left of us, I was getting pinned down then.</b></p> <p>11 Q. When you got out of the car, could you hear shouting at</p> <p>12 that stage?</p> <p>13 <b>A. Yes, I after that -- at that time, I heard a lot of</b></p> <p>14 <b>shouting, yes. I'm being told not to move.</b></p> <p>15 Q. They were telling you not to move?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Did you move?</p> <p>18 <b>A. No, not after that, no. I remember being pinned down,</b></p> <p>19 <b>then.</b></p> <p>20 Q. You were being pinned down?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Why did you get out of the car and try to run?</p> <p>23 <b>A. Because, obviously, I am in a stolen car. And</b></p> <p>24 <b>I realised the car wasn't going anywhere, so I remember</b></p> <p>25 <b>Anthony still being in the car, and after that -- after</b></p> <p style="text-align: center;">Page 51</p>
<p>1 <b>A. No, not that I remember, no.</b></p> <p>2 Q. Had he said anything to you?</p> <p>3 <b>A. No.</b></p> <p>4 Q. And what about Mr Travers in the rear; had he said</p> <p>5 anything to the pair of you?</p> <p>6 <b>A. Not that I can remember, no. You are talking about</b></p> <p>7 <b>seconds, so -- rather than -- you know what I mean? It</b></p> <p>8 <b>is not ...</b></p> <p>9 Q. Did you say anything to him, or Mr Grainger say anything</p> <p>10 on him?</p> <p>11 <b>A. No, not that I remember. I don't remember saying</b></p> <p>12 <b>anything at the time.</b></p> <p>13 Q. By the time that you got out, do you know if Mr Travers</p> <p>14 was in the car or out of it?</p> <p>15 <b>A. I think I am not too sure, where he -- I know he was</b></p> <p>16 <b>still in the back of the car. I was the first one out</b></p> <p>17 <b>of the car.</b></p> <p>18 Q. You were the first out.</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. When you got out of the car, did you see any police</p> <p>21 officers out of any of their vehicles?</p> <p>22 <b>A. I remember people -- people come running, yes.</b></p> <p>23 Q. So when you got out, did you head forwards or</p> <p>24 backwards --</p> <p>25 <b>A. I headed away.</b></p> <p style="text-align: center;">Page 50</p>	<p>1 <b>the -- after the -- yes, after I felt that thing --</b></p> <p>2 <b>after I felt the stuff on my face, the shards of glass,</b></p> <p>3 <b>then I realised that the car wasn't going anywhere, so</b></p> <p>4 <b>I was going out of the car.</b></p> <p>5 Q. But where were you stopped when the police officers</p> <p>6 touched you?</p> <p>7 <b>A. From what I remember, I was stopped at the back of the</b></p> <p>8 <b>car, on the left-hand side.</b></p> <p>9 Q. So rear nearside wheel of the Audi?</p> <p>10 <b>A. No, I think it was the other car. As I was (Inaudible)</b></p> <p>11 <b>towards that car, so I have got out the car, I've gone</b></p> <p>12 <b>to the next -- as I am going round the back of the next</b></p> <p>13 <b>car.</b></p> <p>14 Q. You say in your statement that you were jumped on and</p> <p>15 pinned down.</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Somebody being on your back, pinning you down, with your</p> <p>18 head facing the back of the fence; yes?</p> <p>19 <b>A. Facing the floor outside, I reckon.</b></p> <p>20 Q. So looking at the floor?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. But your head pointing towards the fence at the rear?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Could you see back to what was going on in the car?</p> <p>25 <b>A. No.</b></p> <p style="text-align: center;">Page 52</p>

<p>1 Q. Did you hear any sounds coming from the car after you 2 were pinned down? 3 <b>A. Yes. I heard --</b> 4 Q. What did you hear? 5 <b>A. I heard two -- I heard two more bangs.</b> 6 Q. You heard two more bangs? 7 <b>A. Two more bangs, yes.</b> 8 Q. Could you see what was causing the bangs? 9 <b>A. No.</b> 10 Q. What kind of bangs were they? 11 <b>A. Loud bangs. Gunshot bangs.</b> 12 Q. Did you hear any other sounds before the gunshot bangs? 13 <b>A. Not that I can remember.</b> 14 Q. Did you hear a window on the car being broken? 15 <b>A. No, I can't remember that either.</b> 16 Q. Did you see an object thrown into the car that 17 discharged a CS vapour? 18 <b>A. No.</b> 19 Q. Did you smell or taste or otherwise feel any CS? 20 <b>A. No.</b> 21 Q. You didn't? 22 <b>A. I didn't, no.</b> 23 Q. If you look at your statement at tab 1, the one we are 24 in, there are some page numbers at the top right. If 25 you look at page 190, right at the bottom, the last</p> <p style="text-align: center;">Page 53</p>	<p>1 round the back, but they have got us pinned to the floor 2 and as I am being lifted, I am hearing all this bang, 3 bang, bang. Afterwards, you know what I mean? So they 4 have done that." 5 Then, Mr Schofield says: 6 "Yes, so you have been out on the floor before they 7 have actually popped the tyres and let the explosion gas 8 off?" 9 And you said, "Yes, yes, yes." Or "Yeah, yeah, 10 yeah." 11 <b>A. Yes.</b> 12 Q. There he is asking you about you being out on the floor 13 before they have popped the tyres and let the explosion 14 gas off -- 15 <b>A. Right.</b> 16 Q. -- and you said, "Yeah, yeah, yeah." 17 <b>A. Yes.</b> 18 Q. That tends to suggest you knew about the explosion gas 19 going off? 20 <b>A. No, he said that to me. What I do remember is, once</b> 21 <b>I am out and I am on the floor, I do remember the bangs;</b> 22 <b>two specific bangs going off, yes.</b> 23 Q. You only remember the two bangs going off, and you were 24 not aware of the CS at any stage? 25 <b>A. No.</b></p> <p style="text-align: center;">Page 55</p>
<p>1 couple of lines, it says: 2 "I was then handcuffed to the rear and dragged 3 a couple of metres away from the car until I was on 4 a grassy area [I have gone over the page now] behind the 5 car, to the left of our car. A couple of seconds after 6 being out of the car and whilst I was being dragged 7 across from the car, I remember hearing a bang going off 8 above all the screaming and shouting." 9 <b>A. Yes.</b> 10 Q. "A couple of seconds later, I heard another bang going 11 off. I wasn't sure what the bang was, it sounded like 12 a fire work. I assumed it was either a gunshot or 13 a stun grenade, but I wasn't too sure. The bang sounded 14 similar and it came from my left as I was facing the 15 back fence at that time." 16 Is that accurate? 17 <b>A. Yes.</b> 18 Q. Were you aware of a CS canister being discharged into 19 the Audi at any time? 20 <b>A. No.</b> 21 Q. Again, the recording of the prison conversation at 22 Strangeways? 23 <b>A. Yes.</b> 24 Q. You said to Mr Schofield: 25 "I am getting out the car and scrambling about,</p> <p style="text-align: center;">Page 54</p>	<p>1 Q. He is saying this to you here, over the phone, "You have 2 been out on the floor when they have popped the tyres 3 and let the explosion gas off", and you said, "Yeah, 4 yeah, yeah"? 5 <b>A. Well, he is asking me two questions in one, so I am just</b> 6 <b>saying yes to that. I am on about the bangs.</b> 7 <b>From what I remember, when I am out the car and</b> 8 <b>that, I am already been pinned down, I do remember the</b> 9 <b>bangs going off after that.</b> 10 Q. So it is that he is asking two questions in one there, 11 something that we are all guilty of. 12 <b>A. So I am answering -- I'm answering --</b> 13 Q. You are answering the first part of it? 14 <b>A. I am answering the bangs, yes.</b> 15 Q. Not the second part of it? 16 <b>A. No, there was no gas while I was in the actual vehicle.</b> 17 Q. There wasn't any when you were in the vehicle? 18 <b>A. No.</b> 19 Q. And you didn't notice gas being discharged, even when 20 you were out of it? 21 <b>A. No.</b> 22 Q. You say in your statement that you were positioned on 23 your knees, facing the fence at the back. So your back 24 was towards the car; is that right? 25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 56</p>

<p>1 Q. And you were told not to move and to stay where you 2 were; yes? 3 <b>A. Yes.</b> 4 Q. Were officers pointing their guns at you? 5 <b>A. Yes.</b> 6 Q. Did you see anything going on in the car, therefore? 7 <b>A. No.</b> 8 Q. Did you look round at any point? 9 <b>A. No.</b> 10 Q. Is that because you were not allowed to look round? 11 <b>A. Yes.</b> 12 Q. Did you stay in that position for -- you say in your 13 statement, about 20 to 30 minutes or so? 14 <b>A. Yes.</b> 15 Q. Yes? 16 Could you see what had happened to Mr Travers at 17 this point? 18 <b>A. No.</b> 19 Q. Were you aware that Mr Grainger had been shot? 20 <b>A. Yes.</b> 21 Q. How were you aware that Mr Grainger had been shot? 22 <b>A. I remember hearing -- I remember hearing the -- someone</b> 23 <b>asking for apparatus and that.</b> 24 Q. Were they shouting this? 25 <b>A. Yes, from what I could hear, yes.</b></p> <p style="text-align: center;">Page 57</p>	<p>1 ambulance, that you pieced things together and realised 2 Mr Grainger had been shot? 3 <b>A. Yes.</b> 4 Q. Before that time, had you not realised that he had been 5 shot? 6 <b>A. No.</b> 7 Q. You say in your statement: 8 "I also remember one of the officers running about 9 saying, 'There is no MO here'." 10 Do you now remember that? 11 <b>A. After reading my statement, yes.</b> 12 Q. You say: 13 "I wasn't sure what the officer meant by this." 14 <b>A. Yes.</b> 15 Q. Does that remain the case? 16 <b>A. Yes.</b> 17 Q. Do you know what an MO is? 18 <b>A. Yes, I do know what an MO is, I suppose.</b> 19 Q. What is your understanding of what an MO is? 20 <b>A. I don't know what the actual words are for it.</b> 21 Q. So an MO is a way of operating to commit a crime? 22 <b>A. Yes, I think so, yes.</b> 23 Q. Yes? 24 <b>A. Yes.</b> 25 Q. Does what I have just said reflect your understanding?</p> <p style="text-align: center;">Page 59</p>
<p>1 Q. Could you see them doing any work on Mr Grainger or not? 2 <b>A. No, I couldn't see but I could hear them. They was on</b> 3 <b>about exit wounds and stuff like that.</b> 4 Q. They were on about exit wounds? 5 <b>A. Yes.</b> 6 Q. They were looking for exit wounds? 7 <b>A. Yes.</b> 8 Q. You say in your statement that you remember them saying, 9 "It is not exited", or something like that? 10 <b>A. Yes.</b> 11 Q. Can you remember them saying anything else? 12 <b>A. I remember something about the ambulance. Saying --</b> 13 <b>I do remember one of the police officers asking, "Shall</b> 14 <b>we take him to hospital ourselves?"</b> 15 Q. They were asking that amongst themselves, "Shall we take 16 him --" 17 <b>A. There was one specific voice I heard saying that, and</b> 18 <b>then I heard another voice saying not to take him.</b> 19 Q. To wait for the ambulance; is that right? 20 <b>A. Yes.</b> 21 Q. You say: 22 "I realised he had been shot after I had had time to 23 think, and I had pieced it all together with the shards 24 and glass and everything else I had heard." 25 Was it at that point, when you heard about the</p> <p style="text-align: center;">Page 58</p>	<p>1 <b>A. Yes. What does it mean by the -- what does MO, what</b> 2 <b>does it stand for?</b> 3 Q. Yes, we need not debate that, what it stands for. 4 <b>A. Right.</b> 5 Q. What did you understand them to mean by saying, "There 6 is no MO here"? 7 <b>A. I am not sure.</b> 8 Q. You are not sure? And that remains the case, you don't 9 know? 10 <b>A. Yes.</b> 11 Q. Did you remain on your knees, in the position that you 12 described, at the back, near the fence, on the grass? 13 <b>A. Yes.</b> 14 Q. Were some photographs taken of you? 15 <b>A. Yes.</b> 16 Q. Can you remember who took those; was that a plainclothes 17 police officer or somebody in uniform? 18 <b>A. No, I am not too sure. I don't think it was uniform.</b> 19 Q. You don't think it was a uniform? 20 <b>A. No.</b> 21 Q. How long after the getting out of the car were those 22 photographs taken? 23 <b>A. I can't remember on the time. I am not too sure.</b> 24 Q. You are not too sure. Did there come a time when you 25 were taken away from the scene?</p> <p style="text-align: center;">Page 60</p>

<p>1 <b>A. Yes.</b>  2 Q. And were you taken to a police station?  3 <b>A. Yes.</b>  4 MR BEER: Yes, thank you, sir. Those are the questions that  5 I ask.  6 THE CHAIRMAN: Yes. It is roughly the time I would normally  7 take a break. It rather depends how long people are  8 going to be. Mr Thomas, do you have any questions?  9 MR THOMAS: Yes, I do. Sir, I was going to ask you: are you  10 intending to stick to the same order in terms of the way  11 we question this witness?  12 THE CHAIRMAN: I hadn't seen any reason to depart from it.  13 MR THOMAS: Well, save for the fact that this is  14 a non-police witness and that, in some circles, may make  15 a difference.  16 THE CHAIRMAN: When we have departed in the past, it has  17 been because the rules have required it because the  18 witness has been represented; is this something that you  19 have raised with counsel to the Inquiry?  20 MR THOMAS: No, sir, it is not. I was just enquiring what  21 the practice --  22 THE CHAIRMAN: Unless there is some particular reason to do  23 otherwise, I intend to stick with the normal order.  24 MR THOMAS: So be it.  25 THE CHAIRMAN: However, you have some questions. Mr Davies,</p> <p style="text-align: center;">Page 61</p>	<p>1 correct?  2 <b>A. Yes.</b>  3 Q. And that vehicle comes to a stop?  4 <b>A. Yes.</b>  5 Q. Now, I want to think carefully about this next question.  6 When, before you felt the shards of glass --  7 <b>A. Yes.</b>  8 Q. I am concentrating on you.  9 <b>A. Yes.</b>  10 Q. What were you doing? Before you felt the shards of  11 glass, what were you doing?  12 <b>A. I was sat there.</b>  13 Q. Right, when you say, "Sat there"?  14 <b>A. Yes.</b>  15 Q. You know, so for instance, where were your hands? Were  16 they up or down?  17 <b>A. What do you mean as in up or down? They were just --</b>  18 Q. Sorry, say again?  19 <b>A. They was down. My hands were down at the time.</b>  20 Q. Right. I asked you that question specifically for  21 a reason, and I didn't want to lead you on it. So you  22 say your hands were down?  23 <b>A. Yes.</b>  24 Q. Tell me this: we have seen photographs of the vehicle --  25 I don't need to pull them up, right? You know what the</p> <p style="text-align: center;">Page 63</p>
<p>1 you will have some questions, will you?  2 MR DAVIES: Yes, sir.  3 THE CHAIRMAN: And Ms Whyte?  4 MS WHYTE: A short number.  5 THE CHAIRMAN: I think we will take a break at this stage.  6 If you want to raise any particular matter of procedure  7 with Mr Beer and Ms Cartwright, that will give you  8 an opportunity to do that. If necessary, I will take  9 a decision at the end of that. We will take a 10-minute  10 break, to enable any discussion if it is necessary to  11 take place. Thank you.  12 (11.47 am)  13 (A short adjournment)  14 (11.58 am)  15 THE CHAIRMAN: Yes Mr Thomas.  16 Questions from MR THOMAS  17 MR THOMAS: Mr Totton, good morning, I represent Anthony's  18 family, okay?  19 <b>A. Yes.</b>  20 Q. I have a few questions for you.  21 Can I just start with the arrival of the other car  22 that blocked your vehicle in, yes?  23 <b>A. Yes.</b>  24 Q. Now, the first thing that you say that you see is this  25 vehicle coming up fast, I think you say in first gear,</p> <p style="text-align: center;">Page 62</p>	<p>1 vehicle looks like.  2 <b>A. Yes.</b>  3 Q. Were your hands below the dashboard?  4 <b>A. Yes.</b>  5 Q. In other words, were your hands visible?  6 <b>A. No. No, they wasn't. They wasn't visible, no.</b>  7 Q. When I say, "Visible", I mean from somebody looking into  8 the car from the other vehicle, were your hands on show?  9 <b>A. No, I wouldn't say so.</b>  10 Q. Before the shards of glass, did you raise your hands so  11 they were visible?  12 <b>A. No.</b>  13 Q. I just want to be clear on this: did anybody shout,  14 "Show me your hands", before the shards of glass?  15 <b>A. No. At this time you are talking a second, a split of</b>  16 <b>a second as that car has come to a stop.</b>  17 Q. Yes, okay. So, on your evidence, you are saying this  18 happens very quickly?  19 <b>A. Even before the car has even probably stopped, it was</b>  20 <b>already -- that how quick it was. As the car has</b>  21 <b>actually pulled to that stop, it's -- it was immediate.</b>  22 Q. Okay. Still on a similar theme, just a couple of  23 questions more, I haven't much more for you.  24 When that car pulled up, any markings that it was  25 a police car; any indication that it was a police</p> <p style="text-align: center;">Page 64</p>



<p>1 vehicle?</p> <p>2 <b>A. No, not at that time.</b></p> <p>3 Q. No blues and twos, you know what I mean by that?</p> <p>4 <b>A. Nothing like that, no.</b></p> <p>5 Q. All right.</p> <p>6 Mr Beer asked you one or two questions about what</p> <p>7 you could see from the other vehicle and, certainly in</p> <p>8 your statement, you said that there was a torchlight</p> <p>9 coming from the other vehicle; were you able to see</p> <p>10 whether anybody in that vehicle had any police insignia,</p> <p>11 police markings, police hats, anything like that?</p> <p>12 <b>A. No.</b></p> <p>13 Q. Could you see into the vehicle?</p> <p>14 <b>A. No.</b></p> <p>15 Q. In your witness statement, the one that you did</p> <p>16 in April 2012, this is your IPCC statement -- and this</p> <p>17 is on page 3 of 6 if anybody wants to follow -- you say</p> <p>18 you don't remember hearing anything "before the shards</p> <p>19 of glass hit my face".</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Then, you say:</p> <p>22 "A second or two after that, I realised we were</p> <p>23 blocked in."</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. So can I just ask you about that?</p> <p style="text-align: center;">Page 65</p>	<p>1 <b>silence.</b></p> <p>2 Q. I ask you this specifically because wasn't Anthony your</p> <p>3 childhood mate?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Didn't you tell us that you realised at some point</p> <p>6 afterwards he had been shot?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. So this is your childhood mate who'd been shot, yes?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Did you realise that evening he had died?</p> <p>11 <b>A. No.</b></p> <p>12 Q. When did you realise he had died?</p> <p>13 <b>A. I found out the next day.</b></p> <p>14 Q. All right, so you have realised the next day that he</p> <p>15 died. So let me come back, Mr Totton, just try to help</p> <p>16 me with this. This is your childhood mate, you realise</p> <p>17 the next day he is dead, he had been shot, so it must</p> <p>18 have gone through your mind the last conversation you</p> <p>19 had with him before he died?</p> <p>20 <b>A. Hmm.</b></p> <p>21 Q. So what was it, help us?</p> <p>22 <b>A. I couldn't tell you. I couldn't specifically say what</b></p> <p>23 <b>we was actually talking about at the time.</b></p> <p>24 Q. Well again, still on that theme, you must have been</p> <p>25 thinking to yourself the next day, or not even the next</p> <p style="text-align: center;">Page 67</p>
<p>1 You felt the shards of glass before you realised you</p> <p>2 were blocked in, is that your evidence?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Yes?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Okay. Just before the shards of glass -- in fact,</p> <p>7 before the silver car came into the car park --</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. -- you were sitting in the passenger seat and Anthony</p> <p>10 was sitting in the driver's seat, correct?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. What were the two of you doing?</p> <p>13 <b>A. Just sat there.</b></p> <p>14 Q. In silence or talking?</p> <p>15 <b>A. Yes, we would have been talking, but ...</b></p> <p>16 Q. So the two of you were talking?</p> <p>17 <b>A. Hmm.</b></p> <p>18 Q. Right. Were you talking at the time that the silver car</p> <p>19 pulled into the car park?</p> <p>20 In other words, what I am asking you is: just before</p> <p>21 this car comes in, had you been talking to Anthony?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Do you remember the conversation?</p> <p>24 <b>A. Do I remember the conversation? No, but we would have</b></p> <p>25 <b>been talking. We wouldn't have been sat there in</b></p> <p style="text-align: center;">Page 66</p>	<p>1 day, that evening, when Anthony was shot, you must have</p> <p>2 been thinking why was my mate shot?</p> <p>3 <b>A. Hmm.</b></p> <p>4 Q. Are those the sort of thoughts that went through your</p> <p>5 head?</p> <p>6 <b>A. Yes, stuff like that, yes.</b></p> <p>7 Q. Right. Perfectly natural thing to do, I would suggest.</p> <p>8 Yes?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. All right, so you help us with this. Just before the</p> <p>11 shards of glass hit your face, did you see Anthony in</p> <p>12 your peripheral vision make any sudden movement?</p> <p>13 <b>A. No sudden movement, no.</b></p> <p>14 Q. Do you understand what I mean by peripheral vision? The</p> <p>15 vision from the side. So you might be looking ahead but</p> <p>16 you will have an awareness of somebody who is sitting in</p> <p>17 the driver's seat right next to you if they make any</p> <p>18 sudden movements, do you follow?</p> <p>19 <b>A. Yes. Well, what he would have been doing -- I would</b></p> <p>20 <b>have thought he was going to start the car maybe, that</b></p> <p>21 <b>is it. I don't know. I thought he would have been,</b></p> <p>22 <b>same as me, he would have been going to get out the car.</b></p> <p>23 Q. Well, can I be clear on this, did you try to get out of</p> <p>24 the car, did you make a move to get out of the car</p> <p>25 before the shards of glass?</p> <p style="text-align: center;">Page 68</p>

<p>1 <b>A. Not before, no.</b></p> <p>2 Q. Sorry?</p> <p>3 <b>A. Not before, no.</b></p> <p>4 Q. Not before?</p> <p>5 So why do you think Anthony would have done</p> <p>6 something if the shards of glass is what made you move</p> <p>7 to get out of the car, why do you think Anthony would</p> <p>8 have been doing something before then?</p> <p>9 <b>A. What do you mean?</b></p> <p>10 Q. Well, you move --</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. -- after the shards of glass. That is your evidence, if</p> <p>13 I have understood it correctly. Is that right?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Okay.</p> <p>16 You have told us that just before you and Anthony</p> <p>17 are just sitting in the car talking, although you cannot</p> <p>18 remember what you are talking about.</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Right. I have asked you whether Anthony made any sudden</p> <p>21 movements before the shards of glass?</p> <p>22 <b>A. No. Not that I can remember. I can't remember. You</b></p> <p>23 <b>are talking -- you are talking about a split second. As</b></p> <p>24 <b>that car has pulled up --</b></p> <p>25 Q. That is precisely why I am asking you these questions,</p> <p style="text-align: center;">Page 69</p>	<p>1 Q. Did it have anything to do with a memory stick?</p> <p>2 <b>A. Erm, I'm not too sure about the memory stick.</b></p> <p>3 Q. Why did you pause?</p> <p>4 <b>A. I do know about a memory stick --</b></p> <p>5 Q. Right?</p> <p>6 <b>A. -- or what it's supposed to be, yeah.</b></p> <p>7 Q. Let me ask you about the memory stick.</p> <p>8 Were you there in this small town in relation to</p> <p>9 exchanging a memory stick?</p> <p>10 <b>A. No.</b></p> <p>11 Q. Did you recognise any of the police officers that</p> <p>12 evening?</p> <p>13 <b>A. I didn't recognise any of them that night, no. I didn't</b></p> <p>14 <b>get a chance to.</b></p> <p>15 Q. I am talking about afterwards, recognising their voices</p> <p>16 or anything like that?</p> <p>17 <b>A. Not that I can remember.</b></p> <p>18 MR THOMAS: Not that you can remember.</p> <p>19 Sir, that is all I ask. Thank you.</p> <p>20 THE CHAIRMAN: Mr Weatherby?</p> <p>21 Questions from MR WEATHERBY</p> <p>22 MR WEATHERBY: Just one short area from me.</p> <p>23 I represent Gail Hadfield-Grainger, Anthony's</p> <p>24 partner. Mr Beer asked you about your witness statement</p> <p>25 that you made on 26 April, so in round figures about</p> <p style="text-align: center;">Page 71</p>
<p>1 because you said it was a split second.</p> <p>2 <b>A. As that car has pulled up, before it has even stopped,</b></p> <p>3 <b>that is how quick it was. As it has pulled in, that is</b></p> <p>4 <b>when it happened, as it actually pulled in. It has come</b></p> <p>5 <b>screeching up, as it come skidding to a stop, so as it</b></p> <p>6 <b>comes skidding to a stop, it has happened like that.</b></p> <p>7 <b>That is how fast it was, so ...</b></p> <p>8 Q. Just returning to your statement, this is what you say.</p> <p>9 This is immediately after the shards of glass, you say:</p> <p>10 "A second or two after that I realised we had been</p> <p>11 blocked in and I went for the door after that."</p> <p>12 So in that second or two afterwards, so this is</p> <p>13 after the shards of glass, did you see, from your</p> <p>14 peripheral vision any movement from Anthony?</p> <p>15 <b>A. No, not that I can remember.</b></p> <p>16 <b>As that has happened I am thinking about exiting the</b></p> <p>17 <b>car. So as that car has pulled in, the shot is fired</b></p> <p>18 <b>straight away and then I realised Anthony is not moving</b></p> <p>19 <b>and I am going to get out of the car.</b></p> <p>20 Q. Let me ask you the question that I don't think you have</p> <p>21 been asked. Did you have any guns in the car?</p> <p>22 <b>A. No.</b></p> <p>23 Q. Final question. The meeting that was being arranged in</p> <p>24 Culcheth, yes?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 70</p>	<p>1 seven weeks after the incident, yes?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. He correctly pointed out to you that you hadn't</p> <p>4 mentioned the bang when the car came to a halt, do you</p> <p>5 recall that?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Can I just ask you to help the Inquiry by turning to</p> <p>8 tab 2 in your bundle, which is the transcript of the</p> <p>9 prison recording. I hope it is.</p> <p>10 Is that the transcript of the prison recording, yes?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. First of all, it is a word-for-word transcript, so</p> <p>13 everything that was said by you and by the unknown male,</p> <p>14 who we understand to be Mr Schofield, is written there,</p> <p>15 yes?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Secondly, the date is 23 March 2012. So that predates</p> <p>18 the statement by other a month and is about just between</p> <p>19 two and three weeks after the incident, yes? So this is</p> <p>20 the first recorded account from you, yes?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. The first page is introductions. About halfway down the</p> <p>23 page, Mr Schofield explains the reason why he is asking</p> <p>24 you about what happened:</p> <p>25 "You see the reason I am asking, mate, I wouldn't</p> <p style="text-align: center;">Page 72</p>

<p>1 normally ask, is that we have not been told absolutely 2 nothing." 3 Okay, so it appears the point of the conversation 4 from his point of view is that he wants you, as being 5 a person there, to explain what had happened, yes? 6 <b>A. Yes.</b> 7 Q. Then at the top of the next page, you explain: 8 "We have been sat about in the car for like half 9 an hour." 10 Right? 11 <b>A. Yes.</b> 12 Q. "Just waiting, we were just waiting to speak to 13 somebody." 14 Yes? 15 <b>A. Yes.</b> 16 Q. "What they have been trying to say is what has gone on 17 or what has gone on, so basically at the end of the day 18 we were sat there, yes, sat there playing around doing 19 what we was doing. We were just, you know, we were just 20 sat, we were just sat in the car, you know, and we were 21 just chatting away, fucking the next minute, fucking, 22 you are talking about a split second. The next minute 23 a fucking car screeches up. Now they are in the corner. 24 I can't see nothing. I just hear the screeching of the 25 cars in front of us, yeah."</p> <p style="text-align: center;">Page 73</p>	<p>1 you heard any shouting before that, is there? 2 <b>A. Not at that time, no.</b> 3 Q. You simply don't know about the CS gas because by -- 4 <b>A. Well, I was never personally gassed so --</b> 5 Q. Yes, so by the time the CS gas was deployed, as we know 6 it was, you were already out of the car? 7 <b>A. I was already out of the car, yes.</b> 8 <b>MR WEATHERBY: Thank you very much.</b> 9 THE CHAIRMAN: Yes, Mr Davies. 10 Questions from MR DAVIES 11 MR DAVIES: I am asking questions on behalf of an officer 12 call Q9, who was the officer who discharged the lethal 13 shot. 14 Can I just start with the event itself, and just in 15 that same passage where Mr Weatherby has just finished, 16 the question from Mr Schofield in this prison recording, 17 page 741: 18 "Did Anthony have his hands raised or anything?" 19 You answered: 20 "Well, it would have been -- well, I am not too sure 21 because I am looking at the thing, obviously. But he 22 would have put them up, wouldn't he?" 23 So, pausing there, and recognising the timescales on 24 either view of this are short, the thing you are 25 describing looking at is the very obvious white light</p> <p style="text-align: center;">Page 75</p>
<p>1 <b>A. Yes.</b> 2 Q. And then this: 3 "Within that second as the car has pulled up, as the 4 car has pulled up, so I hear the screech. The next 5 thing I hear is a bang. I am sat in the passenger's, 6 yeah. All I hear is the bang goes and as the bang goes 7 I hear the glass shattering all over my face and that, 8 yeah. Within that, so it has all been a second, I'm 9 fucking --" 10 And then Mr Schofield says: 11 "So wait a sec, was the wheel shot out before the 12 one that come through the screen?" 13 You say: 14 "No, no, no, no." 15 Mr Schofield says, "No?" You then say: 16 "No, the tyre wasn't shot out before. The first 17 thing, the first thing that has happened, right, the car 18 screeched up. As it screeched up, bang, the shot's gone 19 off. As I am hearing the bang I am being shot at 20 through the glass, yeah." 21 So it goes on, and then we come to the passage that 22 Mr Beer read out effectively about the CS gas. 23 <b>A. Yes.</b> 24 Q. So in your first recorded account you very clearly 25 mention hearing the bang. There is no suggestion that</p> <p style="text-align: center;">Page 74</p>	<p>1 from the rear of the police unmarked vehicle, isn't it? 2 <b>A. I'd be looking at -- I meant by that by the car. I am 3 looking straight ahead at the time. My attention is on 4 the car.</b> 5 Q. Yes, and the point about the car was, (a) it had pulled 6 up suddenly? 7 <b>A. Yes.</b> 8 Q. (b) You no doubt felt it was a threat, did you? 9 <b>A. At the time?</b> 10 Q. Yes. 11 <b>A. Probably, yes.</b> 12 Q. A threat from who? 13 <b>A. I don't know, it's just the way it's come screeching up 14 and the way it's just stopped.</b> 15 Q. Would you accept that you are somebody, Mr Totton, who 16 has a lifestyle based on organised crime? 17 <b>A. I have been involved in crime.</b> 18 Q. Do you accept that in March 2012 you were somebody who 19 had made a living from organised crime? 20 <b>A. What do you mean by organised crime?</b> 21 Q. You know what I mean by organised crime. Serious 22 profitable crime, sometimes linked to violence. 23 <b>A. No. I steal cars.</b> 24 Q. Just stealing cars? 25 <b>A. Stealing cars at the time.</b></p> <p style="text-align: center;">Page 76</p>

1 Q. I will come back to that.  
 2 You had been the subject yourself previously of  
 3 an assassination attempt at the Brass Handles.  
 4 **A. Yes.**  
 5 Q. You would have had other people in the world of  
 6 organised crime who may have wished you harm, Mr Totton,  
 7 do you accept that?  
 8 **A. Possibly, yes.**  
 9 Q. So when this car pulled up in a car park, when you are  
 10 there in your balaclava and motorbike gloves, who did  
 11 you perceive the threat may be coming from?  
 12 **A. I wasn't sure at the time.**  
 13 Q. There is quite a menu of people, isn't there, in the  
 14 world of organised crime in Salford that would have been  
 15 capable of using serious violence against you?  
 16 **A. Not at that time, no.**  
 17 Q. No? Really? What had changed?  
 18 **A. I had no problems at that time.**  
 19 Q. What was the last lawful employment you had had before  
 20 2012?  
 21 **A. What do you mean?**  
 22 **Employment? I haven't been employed for a while.**  
 23 Q. How long is a while?  
 24 **A. It's been a long time.**  
 25 Q. Measured in years?

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1 **A. Yes.**  
 2 Q. So you were living off the proceeds of serious organised  
 3 crime, weren't you, Mr Totton?  
 4 **A. Not serious organised crime, no.**  
 5 Q. Just from your share of stolen cars, is that it?  
 6 **A. At that time.**  
 7 Q. You had been on holiday, hadn't you, in January of 2012,  
 8 a couple of weeks?  
 9 **A. Maybe.**  
 10 Q. Where had you gone?  
 11 **A. I don't know, you tell me.**  
 12 Q. Thailand, was it?  
 13 **A. Yes, I've been Thailand quite a lot.**  
 14 Q. You have been there quite a lot. How do you pay for it?  
 15 **A. I have an uncle out there who lives there, so my**  
 16 **accommodation is sweet. I just sort a flight out.**  
 17 Q. I will come back to this in a minute. Let's concentrate  
 18 on the back of the car again. So it pulls up. It is  
 19 a possible threat, but there is a very obvious bright  
 20 scoping light in the rear, isn't there, as it pulls up?  
 21 **A. What I can remember, yes.**  
 22 Q. That is not something that organised criminals use, is  
 23 it? That is a police weapon, that bright light, and you  
 24 knew it?  
 25 **A. I didn't know at the time, no.**

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1 Q. Yes you did, Mr Totton. It differentiating that vehicle  
 2 from the threat from organised criminals, and you knew  
 3 it.  
 4 It was coupled with the police officer in control of  
 5 that weapon telling you and Mr Grainger to show your  
 6 hands, "Armed police", something you heard through the  
 7 windows of your vehicle, didn't you?  
 8 **A. No. There was no shouting or anything at that time.**  
 9 **There wasn't time for that. The shot was within a split**  
 10 **second.**  
 11 Q. Why did you say to Mr Schofield then --  
 12 THE CHAIRMAN: Sorry, he was saying something else. You  
 13 probably didn't hear, he is very quietly spoken.  
 14 What were you adding then?  
 15 **A. I was going to say, before the car's even stopped, it is**  
 16 **like that is how fast the shot was, before the car's**  
 17 **even stopped the shot was fired.**  
 18 THE CHAIRMAN: I see.  
 19 Sorry, Mr Davies.  
 20 MR DAVIES: But it wasn't, was it, Mr Totton? The vehicle  
 21 stopped, "Armed police, show me your hands", and you  
 22 both did.  
 23 **A. I didn't show my hands and there was no shouting like**  
 24 **that to me.**  
 25 Q. Because you recognised from the scoping light and the

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1 shout that this was armed police rather than other  
 2 organised criminals?  
 3 **A. Can I make this clear: there was no shouting whatsoever.**  
 4 **I have been clear on that. The only shouting that come**  
 5 **was when I was out of the vehicle on my part. There was**  
 6 **no shouting before that. No one's asked me to put my**  
 7 **hands up.**  
 8 Q. To Mr Schofield's question in March 2012, the question  
 9 "Did Anthony have his hands raised or anything?" Answer:  
 10 "Well, I am not too sure because I am looking at the  
 11 thing, obviously."  
 12 I am suggesting that is the firearm with the light  
 13 on. In any event:  
 14 "I am looking at the thing, obviously. But he would  
 15 have put them up, wouldn't he?"  
 16 Why would Mr Grainger have put his hands up and not  
 17 you, based on the same event?  
 18 **A. My understanding of that would be, my understanding of**  
 19 **that would be, is he was slouched down, and he was**  
 20 **comfortable in the car, and when the car has pulled up**  
 21 **he would have gone to maybe start the engine, if that**  
 22 **was the case but ...**  
 23 Q. The question Mr Schofield asked you was, "Did Anthony  
 24 have his hands raised or anything?" And your answer  
 25 was:

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1 "Well, I am not too sure because I am looking at the  
 2 thing, obviously. But he would have put them up,  
 3 wouldn't he?"  
 4 Now, if it is obvious that he would have put his  
 5 hands up to the car pulling up and the light and the  
 6 shout of "Armed police", why would you not have done the  
 7 same thing?  
 8 **A. Because I didn't hear that. There was no shouting**  
 9 **telling me to put my hands up.**  
 10 Q. Why, if it is obvious Anthony Grainger would have put  
 11 his hands up, is it not obvious that you would have  
 12 reacted to the same thing in the same way, Mr Totton?  
 13 **A. I didn't have a chance to put my hands up. I was**  
 14 **getting out of the car at this time.**  
 15 Q. You had the same chance as Mr Grainger?  
 16 **A. What I am saying is, I hadn't had a chance to put my**  
 17 **hands up because I was getting out of the car by this**  
 18 **time.**  
 19 Q. You both had the chance to put your hands up, Mr Totton.  
 20 **A. Why would I put my hands up, I didn't hear anything at**  
 21 **that time.**  
 22 Q. And you both did.  
 23 The sequence though is tolerably clear, isn't it?  
 24 There is the sound of a shot and then there are shards  
 25 of glass to the right-hand side of your face?

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1 **A. Yes.**  
 2 Q. You then get out of the vehicle as fast as you can.  
 3 **A. Yes.**  
 4 Q. At some point after that, but when you are on the ground  
 5 outside, you hear two shotgun rounds?  
 6 **A. Yes.**  
 7 Q. You didn't see or hear the CS canister being deployed  
 8 through the window?  
 9 **A. No.**  
 10 Q. And you were not affected by in any way CS gas at the  
 11 scene?  
 12 **A. No.**  
 13 Q. Right. I am just going to go back a bit, but very much  
 14 in headline form, to the reality of this event because  
 15 you will appreciate two things: one, I am not here as  
 16 prosecuting counsel, but, second, Q9's position is that  
 17 you were there to commit armed robbery. So I just want  
 18 to look at that in headline form.  
 19 How did you know Anthony Grainger?  
 20 **A. Known him all my life.**  
 21 Q. Had you committed any criminal acts with him?  
 22 **A. I wouldn't like to say that.**  
 23 Q. Had you previously engaged in armed robbery with him?  
 24 **A. No.**  
 25 Q. Sure?

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1 **A. Very.**  
 2 Q. How well did you know his brother Stuart?  
 3 **A. Quite well.**  
 4 Q. What does that mean?  
 5 **A. Same as I known his brother, all his life.**  
 6 Q. Would you say you were close to Stuart Grainger?  
 7 **A. Yes.**  
 8 Q. Since he has been sent to prison for murder, have you  
 9 been to see him in prison?  
 10 **A. Yes.**  
 11 MS SCHOFIELD: What has this got to do with anything?  
 12 THE CHAIRMAN: Please be quiet.  
 13 **A. I am not here to answer questions about that. I'm here**  
 14 **to answer about that night. So I don't understand why**  
 15 **we've got to go back over that.**  
 16 MR DAVIES: Do you associate with the Corkovic family,  
 17 Mr Totton?  
 18 **A. I am not here to answer questions about that at the**  
 19 **moment.**  
 20 Q. Are you declining to answer that question?  
 21 **A. Yes.**  
 22 Q. Would you have any legitimate reason to associate with  
 23 the Corkovic family?  
 24 **A. I am not here to answer questions on them.**  
 25 THE CHAIRMAN: Sorry?

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1 **A. I am not here to answer questions on them.**  
 2 THE CHAIRMAN: It is a relevant question. The Inquiry has  
 3 heard evidence about the Corkovic family.  
 4 **A. Right. So, what, do you need me to answer that**  
 5 **question?**  
 6 THE CHAIRMAN: Yes, please. Subject to the caution that  
 7 I gave you at the beginning.  
 8 **A. Right, well, the association with them now, at the time,**  
 9 **is that my daughter goes out with one of the Corkovics.**  
 10 **That is why.**  
 11 MR DAVIES: That is all, is it?  
 12 **A. And they're from the local area, of course, I know them.**  
 13 Q. From your background in Salford, Mr Totton, if you  
 14 wanted to do it, would you be able to source a firearm  
 15 if you wanted to use one?  
 16 **A. No.**  
 17 Q. You wouldn't? Is that true?  
 18 **A. I would never have no need for a firearm.**  
 19 Q. I see.  
 20 I suggest you could readily source a firearm if you  
 21 wished to. You had stood trial, hadn't you, in 1997  
 22 with both Stuart and Anthony Grainger -- we know it as  
 23 Operation Vulture -- true or false?  
 24 **A. Yes, and I was found -- I was not convicted of it, was**  
 25 **I?**

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<p>1 Q. No, you weren't but as a group you were subject to 2 extensive surveillance and, according to the evidence we 3 have got, there was an arrest, was there not, at the 4 Adelphi Post Office in Salford, do you remember that? 5 <b>A. No.</b> 6 Q. You, Anthony Grainger, Peter Anderson and 7 Stuart Ellis -- this is E/265 for anyone that is 8 following it -- were seen to leave your address in 9 a private hire vehicle that travelled to the area of the 10 Post Office. You all got out on foot and walked into 11 a walkway alleyway nearby. Remember that? 12 <b>A. No.</b> 13 Q. The robbery occurred at the nearby Post Office. Staff 14 were threatened with a handgun and an axe in order to 15 steal money and a search was completed for the suspect 16 offenders. Do you remember this trial? 17 <b>A. I remember the trial, but I'm not here to answer 18 question on that trial.</b> 19 Q. Stuart Ellis, did you know him? 20 Did you know Stuart Ellis? 21 <b>A. I'm not here to answer questions on that.</b> 22 Q. Why had you travelled to the area of the Post Office 23 together with him? 24 <b>A. I didn't.</b> 25 Q. He was sourced to a nearby address, and found in that</p> <p style="text-align: center;">Page 85</p>	<p>1 body armour, a smoke grenade, overalls, balaclavas and 2 masks. Have you ever lived at 8 Thanet Close? 3 <b>A. At one stage my girlfriend was living there.</b> 4 Q. Who had the lease on the flat, you, your girlfriend or 5 Anthony Grainger? 6 <b>A. It is not a flat. It is an house.</b> 7 Q. Who had the lease on the house, you, your girlfriend or 8 Anthony Grainger? 9 <b>A. At this time, I'm not too sure.</b> 10 Q. Who was living there? 11 <b>A. At what time?</b> 12 Q. Yes. 13 <b>A. No, I can't remember when I was there. It was nowhere 14 near that time though.</b> 15 Q. Well, Mr Grainger is unlikely to be living there unless 16 you are there to, is he? 17 <b>A. What? Are you trying to suggest that we lived together?</b> 18 Q. Did you or didn't you? 19 <b>A. We have never lived together.</b> 20 Q. Never done that? 21 <b>A. Never.</b> 22 Q. I see. 23 <b>A. Do you mean Rimmer?</b> 24 Q. Did Anthony not talk to you about the recovery of these 25 items from his address?</p> <p style="text-align: center;">Page 87</p>
<p>1 address was a bag containing a firearm, two masks and 2 the cash from the Adelphi Post Office robbery. 3 <b>A. Then I suggest you ask him about that then, don't you?</b> 4 Q. Why had you travelled to the area of the Post Office 5 with Mr Ellis, Mr Totton? 6 <b>A. I didn't.</b> 7 Q. You didn't? 8 <b>A. No.</b> 9 Q. I see. 10 Anthony Grainger was subject as well to 11 a prosecution in 2008, wasn't he? Do you remember this, 12 in connection with Unit 6? This is your close friend. 13 Does it mean anything to you? 14 <b>A. No, I don't remember that.</b> 15 Q. Nothing at all? 16 As part of that investigation, 8 Thanet Close was 17 searched on Monday, 8 September 2008. Where were you 18 living on that date, September 2008? 19 <b>A. Don't know, you tell me.</b> 20 Q. You tell me, Mr Totton. 21 <b>A. I can't remember where I was at.</b> 22 Q. It has been referred to as your address earlier on in 23 questioning. Were you living there with Mr Grainger? 24 <b>A. No.</b> 25 Q. Recovered at that search was £1,300 in cash, two sets of</p> <p style="text-align: center;">Page 86</p>	<p>1 <b>A. Not that I remember, no.</b> 2 Q. It is one of your closest friends, Mr Totton. Never 3 talked about it? 4 <b>A. Was I involved at that stage or something?</b> 5 Q. I am asking you a straightforward question. Did he ever 6 talk to you about what was recovered from 8 Thanet 7 Close? 8 <b>A. No.</b> 9 Q. Whose was the black Audi RS4, registration PK57 FMP? 10 Whose was that vehicle? 11 <b>A. I don't know.</b> 12 Q. Let's move on to 2012, and 25 and 26 January 2012, and 13 your trips to Stoke. I emphasise, in headline form. 14 You went no comment in interview following arrest in 15 relation to these visits, didn't you? 16 <b>A. Yes.</b> 17 Q. As was your right. 18 Your defence statement, as the chair will have read, 19 referred to prestige motor vehicles, rather than 20 specifically the Citroen garage. 21 Do you regard Citroens as prestige motor vehicles? 22 <b>A. I'm not here to answer questions on that. I was found 23 not guilty on that trial and at that time. We was down 24 there to steal cars, and that is all I want to say on 25 that.</b></p> <p style="text-align: center;">Page 88</p>

1 Q. The planning of those two trips involved, and  
 2 I summarise at very headline level, repeated phone calls  
 3 between you and Anthony Grainger in the build up to that  
 4 period?  
 5 **A. Yes.**  
 6 Q. You did not travel with your mobile telephones. You did  
 7 not use conventional petrol stations to fill up the  
 8 cars. Instead you used jerry cans to avoid cameras at  
 9 petrol stations. You travelled down there twice.  
 10 What was your reward going to be, Mr Totton?  
 11 **A. I am not here to answer that.**  
 12 Q. At your trial, you seemed unable to say whether there  
 13 had been any discussion as to how the other two unnamed  
 14 men were actually going to get access to the relevant  
 15 car keys for these three Citroens. It seemed to end up  
 16 with a suggestion that they would do it just with  
 17 handheld power tools. Was that the plan?  
 18 **A. I am not here to answer that.**  
 19 Q. How were these two men going to obtain access to  
 20 an alarmed and camera-ed Citroen garage forecourt and  
 21 showroom --  
 22 MS SCHOFIELD: Can I just say, what is has that got to do  
 23 with this?  
 24 THE CHAIRMAN: No, please don't. Please keep quiet.  
 25 I don't want to have to adjourn.

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1 The relevance of these questions, so that you know,  
 2 Mr Totton, is that they go to the question of whether  
 3 your real reason for associating with Anthony Grainger  
 4 at this time was, as I think is being suggested, not to  
 5 steal cars but to conduct armed robberies. So they are  
 6 relevant questions, all right?  
 7 **A. Yes.**  
 8 THE CHAIRMAN: Thank you.  
 9 MR DAVIES: So these were premises you were to say had  
 10 cameras, they had cars that in aggregate, if not  
 11 individually, were valuable, and yet from your evidence  
 12 to the criminal trial, the two men you were with were  
 13 simply going to apparently get car keys from a presumed  
 14 location within the site, in the safe, using handheld  
 15 power tools. It is ridiculous, Mr Totton.  
 16 **A. Right, well, if I'm capable, if you like, you're**  
 17 **suggesting, if I'm capable of breaking into a depot as**  
 18 **secure as that, how could I not have been capable of**  
 19 **getting into a place like that? If I'm capable of doing**  
 20 **that, why can't I get into a car showroom, as I can into**  
 21 **a depot, the most secure thing in the country.**  
 22 **But yes.**  
 23 Q. Where were these cars parked, showroom or forecourt, on  
 24 the morning you were there?  
 25 **A. I am not here to answer them questions. I have been**

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1 **found not guilty of that charge.**  
 2 Q. Why was the plan that the two men with their handheld  
 3 power tools would come out, notify you and then somehow  
 4 you would go and get Mr Grainger and bring him back to  
 5 the scene to drive a vehicle away? That just adds risk,  
 6 doesn't it, if this is the truth of what was happening?  
 7 **A. I am not here to answer that.**  
 8 Q. Why would you lend yourself to an operation where you  
 9 didn't even know for sure where the safe was that was  
 10 presumed to have these keys?  
 11 You are an experienced criminal, Mr Totton. You  
 12 wouldn't have done it.  
 13 **A. Yes, and I was found not guilty of that, so.**  
 14 Q. How are you going to get the cars through the barrier on  
 15 the forecourt?  
 16 **A. I am not here to answer that.**  
 17 THE CHAIRMAN: You are, Mr Totton. As I have explained to  
 18 you the relevance of these questions.  
 19 MR DAVIES: How are you going to get these three cars,  
 20 assuming you could get the keys in the first place,  
 21 through the barrier on the forecourt?  
 22 There is no answer, Mr Totton, because there was no  
 23 plan, because you were not there to steal Citroens. It  
 24 is as obvious as that, isn't it?  
 25 **A. What did they say in my own trial?**

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1 Q. Did these vehicles have registration plates? They were  
 2 new cars? Can you answer that?  
 3 **A. No.**  
 4 Q. No.  
 5 Can you answer why you were thinking of having these  
 6 two unnamed men gain entry to the showroom, and  
 7 presumably the safe, at more or less the same time that  
 8 staff would be arriving for work on 26 January 2012?  
 9 **A. No.**  
 10 Q. It is ridiculous, Mr Totton, to have timed it like that  
 11 if it was true.  
 12 Or why Mr Grainger was waiting 500 yards away in  
 13 a vehicle that was going to be left there.  
 14 What was going to be done to disable the cameras in  
 15 the showroom?  
 16 What was going to be done to disable the cameras in  
 17 the showroom?  
 18 **A. I can't remember.**  
 19 Q. Because there has been no suggestion these men went in  
 20 wearing balaclavas, Mr Totton.  
 21 You were there to conduct cash in transit robberies  
 22 on G4S vehicles leaving that depot at about the same  
 23 time, Mr Totton. That is the truth, and you got spooked  
 24 by an overhead police surveillance aeroplane and you  
 25 changed plan.

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<p>1 MS SCHOFIELD: That is your opinion.</p> <p>2 THE CHAIRMAN: Mr Straw, would you like to go and have</p> <p>3 a word with your client. Thank you.</p> <p>4 MR DAVIES: How much had you stood to earn from the supposed</p> <p>5 theft of three Citroens?</p> <p>6 MS SCHOFIELD: He keeps bringing Stuart up. He is bringing</p> <p>7 Stewart up, right. Stuart has paid for what he has</p> <p>8 done. Q9 is a murderer. He's got to pay for what he's</p> <p>9 done as well.</p> <p>10 THE CHAIRMAN: Mrs Schofield, please keep quiet. I really</p> <p>11 don't want to have to exclude you. I really don't.</p> <p>12 This doesn't help anybody's cause.</p> <p>13 MS SCHOFIELD: He is doing this deliberately to wind me up.</p> <p>14 THE CHAIRMAN: Please be quiet.</p> <p>15 Carry on, Mr Davies, if you would.</p> <p>16 MR DAVIES: How much were you promised to earn from the</p> <p>17 supposed theft of these three Citroens, Mr Totton?</p> <p>18 <b>A. I can't remember.</b></p> <p>19 Q. You cannot remember?</p> <p>20 <b>A. No.</b></p> <p>21 Q. Relative to what you could get from a cash in transit</p> <p>22 robbery, it is pretty small beer, isn't it, the profit</p> <p>23 or your share of a profit on a few stolen cars?</p> <p>24 <b>A. I wouldn't know.</b></p> <p>25 Q. It is obvious, isn't it?</p> <p style="text-align: center;">Page 93</p>	<p>1 Mr Totton -- three trips in four days, not to find</p> <p>2 somebody? Why would you do that?</p> <p>3 <b>A. I was locating (Inaudible).</b></p> <p>4 Q. Why didn't Anthony go into pubs if he was -- he,</p> <p>5 Fenton -- was believed to possibly be in pubs?</p> <p>6 <b>A. Because, like I say, he was looking for the car, so ...</b></p> <p>7 Q. Why sit on 3 March in the corner of a car park for</p> <p>8 approximately half an hour that is not even a pub car</p> <p>9 park, if you are looking for a particular motor car?</p> <p>10 Why not continue to drive around?</p> <p>11 <b>A. It is the access to the pub car park.</b></p> <p>12 <b>It wasn't to specifically one pub. It was the</b></p> <p>13 <b>actual area itself.</b></p> <p>14 Q. But you were there for approximately half an hour</p> <p>15 without moving on the 3rd alone -- I am not going to go</p> <p>16 through every date. On the 3rd alone, the three of you</p> <p>17 were sitting there on a Saturday night just hoping this</p> <p>18 man Fenton's car would drive into the Sainsbury's car</p> <p>19 park? That is your position, is it?</p> <p>20 <b>A. I don't think it was the Sainsbury's car park.</b></p> <p>21 Q. The Jackson Lane car park?</p> <p>22 <b>A. It wasn't the Sainsbury's car park. The Sainsbury's has</b></p> <p>23 <b>its own car park, a big one.</b></p> <p>24 Q. What made you think that this man's car would go into</p> <p>25 the Jackson Lane car park?</p> <p style="text-align: center;">Page 95</p>
<p>1 Let's move to Culcheth -- I am going to skip</p> <p>2 St Helens. You had had your holiday abroad, you came</p> <p>3 back. On four consecutive days -- albeit on the 2nd you</p> <p>4 were not party to it -- Mr Grainger, you and others were</p> <p>5 in the same small town centre for a reason, weren't you?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. You are telling the chair, and you told the criminal</p> <p>8 trial, that the reason was to locate a man called Fenton</p> <p>9 to enforce a debt for Anthony in relation to vehicles.</p> <p>10 Was it a vehicle or was it vehicles?</p> <p>11 <b>A. Vehicle, as far as I'm aware.</b></p> <p>12 Q. Because your defence statement referred to "vehicle",</p> <p>13 and your evidence at trial at one point referred to</p> <p>14 "vehicles", plural. So which was it?</p> <p>15 <b>A. From what I am aware, I think it was a vehicle, one</b></p> <p>16 <b>vehicle.</b></p> <p>17 Q. You were not seen to go into any pubs to look for him,</p> <p>18 any of you.</p> <p>19 <b>A. No.</b></p> <p>20 Q. Indeed, in your evidence at trial, there is no reference</p> <p>21 to him being possibly drinking in pubs. It was</p> <p>22 reference to him finishing work. So why have you</p> <p>23 changed your story on that one?</p> <p>24 <b>A. I have not changed it, it's just that is what it was.</b></p> <p>25 Q. Why would you go to all this trouble for Anthony,</p> <p style="text-align: center;">Page 94</p>	<p>1 <b>A. It wasn't just that main car park. It was all of them</b></p> <p>2 <b>in general.</b></p> <p>3 Q. You were there for half an hour. What made you think</p> <p>4 there was a real possibility of this man's car going</p> <p>5 into that car park?</p> <p>6 <b>A. We kept checking each car park, and obviously we were in</b></p> <p>7 <b>a stolen car so we didn't really want to keep driving</b></p> <p>8 <b>and bring attention to ourselves.</b></p> <p>9 Q. You had moved a hacksaw four days before, hadn't you?</p> <p>10 <b>A. No.</b></p> <p>11 Q. You had your balaclava on, and you call them motorbike</p> <p>12 gloves.</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Ready to commit an armed robbery, Mr Totton?</p> <p>15 <b>A. It clearly wasn't. You have to be armed, wouldn't we,</b></p> <p>16 <b>if we was going to commit an armed robbery.</b></p> <p>17 Q. Is it just a coincidence that Mr Rimmer, at his home</p> <p>18 address, had a pair of gloves that were identical to</p> <p>19 yours?</p> <p>20 <b>A. You would have to ask him that.</b></p> <p>21 Q. I am asking you.</p> <p>22 Is it just a coincidence that Mr Rimmer had</p> <p>23 an identical pair of gloves to yours?</p> <p>24 <b>A. Yeah, but (Inaudible) motorbike gloves. That is what</b></p> <p>25 <b>they are used for.</b></p> <p style="text-align: center;">Page 96</p>



<p>1 Q. He had a motorbike jacket, didn't he?</p> <p>2 <b>A. I am not sure.</b></p> <p>3 Q. Did you have access to a motorbike?</p> <p>4 <b>A. I'm not sure.</b></p> <p>5 Q. Did you have access to a motorbike that night?</p> <p>6 <b>A. I didn't own one at the time, no.</b></p> <p>7 Q. Was somebody bringing you the firearm, Mr Totton?</p> <p>8 <b>A. That is clearly not true, that.</b></p> <p>9 Q. That is what you were waiting for, isn't it?</p> <p>10 <b>A. Is that what you think?</b></p> <p>11 <b>I was under surveillance at the time, so where is</b></p> <p>12 <b>this person?</b></p> <p>13 Q. If the purpose of being there was for Mr Grainger to</p> <p>14 look for the vehicle, why didn't he get out and look for</p> <p>15 the vehicle through the hedge?</p> <p>16 <b>A. When driving round, like I said, we wasn't just in that</b></p> <p>17 <b>place at one particular time, we drove through the area</b></p> <p>18 <b>itself.</b></p> <p>19 Q. Why in the half hour you are sitting there, before the</p> <p>20 police struck, did Mr Grainger not get out of his</p> <p>21 vehicle to look through the gap in the hedge to the</p> <p>22 Cherry Tree pub car park to see if the Fenton vehicle</p> <p>23 was there, if that was the true purpose?</p> <p>24 <b>A. So what didn't I (Inaudible) -- it wasn't just</b></p> <p>25 <b>a particular -- it was particular of all the pubs in the</b></p> <p style="text-align: center;">Page 97</p>	<p>1 Questions from MS WHYTE</p> <p>2 MS WHYTE: I ask questions on behalf of Greater Manchester</p> <p>3 Police and my questions will be over by 1.00, so you</p> <p>4 know where you are.</p> <p>5 In the period 2011 to 2012, would it be fair to say</p> <p>6 that, for various personal or other reasons, your</p> <p>7 address changed a number of times? Is that fair?</p> <p>8 <b>A. Possibly, yes.</b></p> <p>9 Q. You may have been with your dad or a while, we know you</p> <p>10 were at Thanet Close, which was an address associated</p> <p>11 with Anthony, who was not living there at the time,</p> <p>12 right?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. You were with Mr Rimmer for a while at The Pines in</p> <p>15 Moston.</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. I did not fully hear you answer because I cannot</p> <p>18 actually hear a lot of what you are saying, so please</p> <p>19 bear that in mind, so the people at the back can hear as</p> <p>20 well as I, and I think you referred to the Skyline</p> <p>21 Apartments, but I think said that was only for a couple</p> <p>22 of weeks, is that right? Is that what you said?</p> <p>23 <b>A. From what I remember, yes.</b></p> <p>24 Q. I don't need you to tell us where, but you moved on</p> <p>25 after the Skyline to somewhere else --</p> <p style="text-align: center;">Page 99</p>
<p>1 <b>area, the pubs and bars in there.</b></p> <p>2 Q. Mr Totton, I am not required to put a case but I am</p> <p>3 going to in a sentence.</p> <p>4 You were there with Anthony Grainger, with</p> <p>5 Mr Travers, with Rimmer in the background somewhere else</p> <p>6 to commit armed robbery that night.</p> <p>7 <b>A. Well, if you find out, you will find that Rimmer was up</b></p> <p>8 <b>in Leeds that night.</b></p> <p>9 Q. He travelled to Leeds at about 8.15 or so. But you</p> <p>10 three were there in that car park for the purposes of</p> <p>11 armed robbery, and your story about Fenton is</p> <p>12 demonstrably false.</p> <p>13 <b>A. If we was there to do armed robbery, we would be armed.</b></p> <p>14 <b>And if we was waiting, why come in and get us too soon</b></p> <p>15 <b>then, if we was waiting for this stuff, like what you</b></p> <p>16 <b>keep saying.</b></p> <p>17 Q. You were either waiting for a firearm or there was one</p> <p>18 secreted at the scene, Mr Totton.</p> <p>19 <b>A. Why haven't you found it then, if that's the case? You</b></p> <p>20 <b>are just making it up as you go along. That is what is</b></p> <p>21 <b>going on now. You are just making it up as you go</b></p> <p>22 <b>along.</b></p> <p>23 MR DAVIES: That is all I ask, thank you, sir.</p> <p>24 THE CHAIRMAN: Ms Whyte.</p> <p>25</p> <p style="text-align: center;">Page 98</p>	<p>1 <b>A. No, I didn't move on after the Skyline.</b></p> <p>2 Q. Well, you were remanded and when you were acquitted you</p> <p>3 will have moved on, and I don't want to know where, all</p> <p>4 right?</p> <p>5 So it is fair to say that within the space of</p> <p>6 a year, you had changed address, excluding remand, quite</p> <p>7 regularly for one reason or another?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. You have told us, and I think you said on a previous</p> <p>10 occasion that, at the time, you had been hiring a silver</p> <p>11 Audi, is that right?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Can you remember how long you had been hiring it for,</p> <p>14 just very roughly, I don't want precise dates?</p> <p>15 <b>A. I think it was about a week at that time.</b></p> <p>16 Q. You were hiring it on a five-day cycle. Do you remember</p> <p>17 saying that?</p> <p>18 <b>A. I'm not too sure.</b></p> <p>19 Q. You don't remember.</p> <p>20 Help us, why were you hiring cars?</p> <p>21 <b>A. Because I didn't have my own vehicle at that time.</b></p> <p>22 Q. Even Mr Beer, who is sitting in front of me, cannot hear</p> <p>23 you. It is not difficult, speak up.</p> <p>24 <b>A. I didn't own a vehicle at the time.</b></p> <p>25 Q. You didn't own a vehicle?</p> <p style="text-align: center;">Page 100</p>

<p>1 <b>A. No.</b></p> <p>2 Q. But you were able to hire an expensive vehicle and you</p> <p>3 had access to your associates' vehicles, because we know</p> <p>4 you would use sometimes Mr Rimmer's, we know you would</p> <p>5 use stolen vehicles, would that be fair?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. So in 2012, and late 2011, before 3 March, you had</p> <p>8 access to a number of different vehicles, can I put it</p> <p>9 that way? Is that fair?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. I am not going to ask you very many questions about</p> <p>12 Stoke at all, but I just want to ask you a few questions</p> <p>13 about what you have previously said about, okay?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. If the Stoke job, as you have described it, had</p> <p>16 succeeded and you had stolen what you say are vehicles,</p> <p>17 it would have necessitated leaving the stolen BMW in</p> <p>18 Stoke, wouldn't it, as part of the plan? That is what</p> <p>19 you told the previous court, yes?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. And the plan would have been for somebody to go back and</p> <p>22 reclaim it?</p> <p>23 <b>A. It would have been, yes.</b></p> <p>24 Q. Which would add to the risk, wouldn't it, because you</p> <p>25 wouldn't want to be associated with the stolen car for</p> <p style="text-align: center;">Page 101</p>	<p>1 Q. -- but no crime had occurred because you decided as</p> <p>2 a team to head back north, yes?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. That crime involved two high performance vehicles,</p> <p>5 didn't it?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Travelling quite some way, using different routes, with</p> <p>8 different objects in them, is that fair?</p> <p>9 <b>A. Possibly, yes.</b></p> <p>10 Q. While the lads that you were sending in to steal the</p> <p>11 cars had power tools, didn't they?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. So which cars were the power tools in, the Audi or the</p> <p>14 BMW?</p> <p>15 <b>A. I can't remember.</b></p> <p>16 Q. You cannot recall.</p> <p>17 We know on the 26th that there was a sledgehammer in</p> <p>18 the BMW. So it is an example of a crime being</p> <p>19 committed, would you agree, on your account intending to</p> <p>20 commit a crime involving two high-powered vehicles with</p> <p>21 tools in one car or the other?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Is that fair?</p> <p>24 What was the plan if the lads had gone in and the</p> <p>25 garage had been occupied, if there was a cleaner or</p> <p style="text-align: center;">Page 103</p>
<p>1 too long, is that fair?</p> <p>2 <b>A. Possibly, yes.</b></p> <p>3 Q. Yes.</p> <p>4 You told the court that the 25 January job didn't</p> <p>5 come off because it got too late, became too risky, yes?</p> <p>6 <b>A. No, what happened -- what I remember, I remember</b></p> <p>7 <b>the guy, there was a guy in the baker's, where we was</b></p> <p>8 <b>parked next to the car showroom, there was a guy in the</b></p> <p>9 <b>baker's who has popped his head over and it spooked us,</b></p> <p>10 <b>so we didn't know whether he was phoning the police</b></p> <p>11 <b>or --</b></p> <p>12 Q. Was that not the 26th? Was that not the reason for</p> <p>13 bailing on the 26th, because you were worried someone</p> <p>14 might have been around? Are you getting two dates</p> <p>15 muddled up?</p> <p>16 <b>A. Right, yes. Yes.</b></p> <p>17 Q. What you previously said, and if it is wrong now is your</p> <p>18 chance to correct it, but I think what you previously</p> <p>19 said was that it got a bit too late on the 25th and on</p> <p>20 the 26th you had seen someone pop their head out and</p> <p>21 that spooked you, yes?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. So, on your account, a crime had been intended involving</p> <p>24 four people --</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 102</p>	<p>1 an industrious worker who had gone in early?</p> <p>2 <b>A. I wouldn't have gone in then.</b></p> <p>3 Q. What if you hadn't known?</p> <p>4 <b>A. If we hadn't know then we would have left.</b></p> <p>5 Q. So no plan there about what to do?</p> <p>6 <b>A. There was no plan because we wasn't expecting anyone to</b></p> <p>7 <b>be there, no.</b></p> <p>8 Q. All right.</p> <p>9 And on the Stoke job, if I can put it that way,</p> <p>10 Mr Rimmer had dropped you off on the 25th, hadn't he, or</p> <p>11 that is certainly what you told the court on the last</p> <p>12 occasion. Does that sound familiar?</p> <p>13 <b>A. It might be, yes. Can't remember.</b></p> <p>14 Q. Right. And you also I think said that you had been</p> <p>15 using Mr Rimmer's car, that I think at the time was</p> <p>16 a Renault Megane, does that sound familiar to you?</p> <p>17 <b>A. Yes. I remember that, yes.</b></p> <p>18 Q. Why when high performance vehicles are stolen and then</p> <p>19 used, and we know what is what happened in your case</p> <p>20 with Anthony Grainger, why put them on false plates?</p> <p>21 I know that sounds like an obvious question, but just</p> <p>22 tell us.</p> <p>23 <b>A. To conceal the identity of a stolen car.</b></p> <p>24 Q. To help conceal its identity?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 104</p>

1 Q. So to decrease any suspicion from either members of the  
 2 public or of course the police. It is fairly obvious  
 3 stuff, isn't it?  
 4 **A. Yes.**  
 5 Q. Did Mr Grainger ever explain to you why, if that is the  
 6 case, he had decided to leave the original plates in the  
 7 stolen car?  
 8 **A. They was hidden under the back mat.**  
 9 Q. Quite a risky thing to do, if you are trying to conceal  
 10 the identity of the car, isn't it, Mr Totton?  
 11 **A. Yes, but they was stashed inside the back of the car.**  
 12 Q. And Mr Grainger was very experienced at managing the  
 13 business of stolen cars, wasn't he?  
 14 **A. He was involved in stolen cars, yes.**  
 15 Q. So is there anything about your answer previously to the  
 16 questions about the hacksaw that you would like to  
 17 change bearing in mind that car was stolen in  
 18 mid December of 2011?  
 19 **A. It clearly was a set of reg plates.**  
 20 Q. So, on your account, so that I am clear, experienced  
 21 Mr Grainger, when it comes to stolen cars -- and this  
 22 one was a very high performance valuable car, wasn't it?  
 23 **A. Yes.**  
 24 Q. -- has elected to leave the original plates, albeit with  
 25 some attempt at concealment in the back of the car,

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1 right up until late February, is that what you are  
 2 saying?  
 3 **A. I am saying they was left under a back mat, yes.**  
 4 Q. Okay.  
 5 You were also asked questions about the item you  
 6 were wearing on your head and the fact that it could be  
 7 rolled down to become a balaclava, and I am now talking  
 8 about 3 March. It is one of the very few questions I am  
 9 going to ask about 3 March.  
 10 You said you were wearing it because you were in  
 11 a stolen car and, if you were chased, you would be able  
 12 to roll it down?  
 13 **A. Yes.**  
 14 Q. Yes? I think you explained that your answer was in the  
 15 context of being chased by the police, yes?  
 16 **A. Yes.**  
 17 Q. Which rather assumes that, if you had come to the  
 18 attention of the police, you would have done something  
 19 that resulted in a chase. You wouldn't have just  
 20 stopped and said "Here we are, fair cop", you were going  
 21 to roll down a balaclava and do everything you could to  
 22 avoid being arrested, weren't you?  
 23 **A. I would have done, yes.**  
 24 Q. And that is part of the reason for having a spanky high  
 25 performance car, isn't it? Again, it is obvious, isn't

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1 it?  
 2 **A. Yes.**  
 3 Q. So even if you had come to the attention of what you  
 4 thought was either a marked police car or an unmarked  
 5 police car, your instinct would have been flight?  
 6 **A. Probably, yes.**  
 7 Q. And so would Anthony's, wouldn't it?  
 8 **A. Probably.**  
 9 Q. Two more matters.  
 10 You have been asked about the telephone call with  
 11 Mr Schofield in March, and I don't want to ask you very  
 12 much about it apart from one passage, and it is J/742.  
 13 I wonder if bundle J could be given to Mr Totton so  
 14 that, in fairness, he can see it. Actually, quite  
 15 right, it is in your file in front of you, Mr Totton,  
 16 apologies.  
 17 **A. What page?**  
 18 Q. Bear with me. It is tab 2. Page 742, really small  
 19 numbers at the top and bottom of the page. Have you got  
 20 that?  
 21 **A. Yes.**  
 22 Q. Mr Schofield says this towards the top of the page:  
 23 "A name for you: Ian Arthur, who is he?"  
 24 See that?  
 25 **A. Yes.**

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1 Q. And you reply "Ian Arthur? Is he a copper, him?"  
 2 Mr Schofield said:  
 3 "He is the one who was sat right the way through  
 4 Anthony's trial, right the way through it all, and he  
 5 used to be down here when Hope and Bellamy and Churchill  
 6 was down here."  
 7 Hope and Bellamy and Churchill, who are they? I  
 8 don't want any other details, dates of birth or other  
 9 names, but are they friends or other police officers,  
 10 who do you understand them to be?  
 11 **A. I am not sure, police officers I think.**  
 12 Q. Right, because you don't question him about that, you  
 13 just say "Right, I see."  
 14 Then Mr Schofield says:  
 15 "Well, he was in charge of that one at Bolton."  
 16 And you say, "Was he?" See?  
 17 **A. Yes.**  
 18 Q. What did you understand the reference to "that one at  
 19 Bolton" to be? Because, again, you don't question it,  
 20 so you obviously know what he is talking about. What  
 21 was it?  
 22 **A. I am not sure.**  
 23 Q. Just read it to yourself, Mr Totton, so that you have  
 24 the opportunity to respond to this question.  
 25 "He was in charge of that one at Bolton."

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<p>1 Answer: "Was he?"</p> <p>2 You don't say "What one at Bolton?" "What is</p> <p>3 Bolton?" So you must have known what he was referring</p> <p>4 to.</p> <p>5 What was he referring to?</p> <p>6 <b>A. I am not sure.</b></p> <p>7 Q. Try, Mr Totton.</p> <p>8 <b>A. I don't know what you mean.</b></p> <p>9 Q. Was it --</p> <p>10 <b>A. He is asking me the question, I just go "Was he?"</b></p> <p>11 Q. You plainly know what he was talking about, Mr Totton,</p> <p>12 but you are not going to tell us. Was it a reference to</p> <p>13 a very serious offence involving a firearm?</p> <p>14 <b>A. It's got something to do with Anthony.</b></p> <p>15 Q. Pardon?</p> <p>16 <b>A. Something to do with Anthony.</b></p> <p>17 Q. You tell us, you are the one conversing about it.</p> <p>18 <b>A. You are trying to get at it is something to do with me.</b></p> <p>19 Q. No, I am not. I am suggesting you obviously know what</p> <p>20 he is referring to. I am not suggesting that you were</p> <p>21 necessarily involved in it. What is he referring to?</p> <p>22 <b>A. I don't know. I honestly don't know.</b></p> <p>23 Q. You do, Mr Totton. You cannot help us any further with</p> <p>24 it?</p> <p>25 <b>A. No.</b></p> <p style="text-align: center;">Page 109</p>	<p>1 likely to last? He is the post-incident manager, isn't</p> <p>2 he?</p> <p>3 MR BEER: He is.</p> <p>4 What we propose, sir, is just to deal with him today</p> <p>5 and not to deal with the two other IPCC witnesses today,</p> <p>6 probably adjourn those over to next Tuesday, so that we</p> <p>7 can carry on with our running order for this week.</p> <p>8 THE CHAIRMAN: Right.</p> <p>9 MR BEER: We will complete him in the afternoon.</p> <p>10 THE CHAIRMAN: If we will do that comfortably -- I think</p> <p>11 Ms Cartwright is dealing with his evidence?</p> <p>12 MR BEER: Yes. 2.15.</p> <p>13 THE CHAIRMAN: I was going to suggest we have a slightly</p> <p>14 longer than usual -- there is another reason as well,</p> <p>15 which is that I have an official engagement over the</p> <p>16 short adjournment, so it will enable me to fulfil that.</p> <p>17 We will say 2.15.</p> <p>18 MR BEER: Thank you, sir.</p> <p>19 (1.06 pm)</p> <p>20 (The Luncheon Adjournment)</p> <p>21 (2.16 pm)</p> <p>22 THE CHAIRMAN: Yes, Ms Cartwright.</p> <p>23 MS CARTWRIGHT: Good afternoon, sir. Anthony Simpson,</p> <p>24 please.</p> <p>25</p> <p style="text-align: center;">Page 111</p>
<p>1 MS WHYTE: Thank you very much.</p> <p>2 THE CHAIRMAN: Anything further?</p> <p>3 MR BEER: No thank you, sir.</p> <p>4 THE CHAIRMAN: Thank you.</p> <p>5 That is the end of your evidence, Mr Totton. You</p> <p>6 are now free to go. Thank you.</p> <p>7 <b>A. Thank you, sir.</b></p> <p>8 THE CHAIRMAN: Mr Beer?</p> <p>9 MR BEER: Mr Travers was due to give evidence today.</p> <p>10 THE CHAIRMAN: Yes.</p> <p>11 MR BEER: The Inquiry has served on him a notice under</p> <p>12 section 21 of the Inquiries Act 2005 requiring him to</p> <p>13 give evidence today. He hasn't turned up despite</p> <p>14 persistent efforts to secure his attendance today.</p> <p>15 THE CHAIRMAN: Yes.</p> <p>16 MR BEER: There are provisions under section 35 and 36 of</p> <p>17 the Inquiries Act to take either enforcement action or</p> <p>18 criminal proceedings against him. That is something which</p> <p>19 I know, sir, you will consider in the medium term.</p> <p>20 THE CHAIRMAN: Yes.</p> <p>21 MR BEER: We have line up, in case Mr Totton or Mr Travers</p> <p>22 did not attend today, some back up witnesses, one of</p> <p>23 whom, Mr Simpson, we are going to deal with this</p> <p>24 afternoon.</p> <p>25 THE CHAIRMAN: How long do you anticipate his evidence is</p> <p style="text-align: center;">Page 110</p>	<p>1 MR ANTHONY SIMPSON (sworn)</p> <p>2 THE CHAIRMAN: Thank you, Mr Simpson. You are free to sit</p> <p>3 down if you prefer.</p> <p>4 <b>A. Thank you, sir.</b></p> <p>5 <b>Questions from MS CARTWRIGHT</b></p> <p>6 MS CARTWRIGHT: Good afternoon, Mr Simpson. My name is</p> <p>7 Sophie Cartwright and I ask questions on behalf of the</p> <p>8 Inquiry. In front of you there is a bundle that has</p> <p>9 a number of witness statements in. Can I ask you,</p> <p>10 please, to turn behind tab 7.</p> <p>11 You can see there, Mr Simpson, a statement dated</p> <p>12 24 April of 2012. If you turn to the next tab, tab 8,</p> <p>13 there is a statement there dated 25 of September of</p> <p>14 2012, yes?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Can I just before we move to the next index, we can see</p> <p>17 that you make reference within that statement to</p> <p>18 a statement "further to that provided by me on</p> <p>19 24 March 2012". As we saw a moment ago, I think the</p> <p>20 first statement is dated 24 April of 2012. Can you</p> <p>21 assist, has there ever been a 24 March 2012 statement or</p> <p>22 is that a typographical error?</p> <p>23 <b>A. I think it must be a typographical error.</b></p> <p>24 Q. Thank you.</p> <p>25 If we could move, please, behind tab 9, we there see</p> <p style="text-align: center;">Page 112</p>

<p>1 your third statement dated 23 January 2013.</p> <p>2 Can I ask in respect of those three statements, save</p> <p>3 for the amendment made to the second statement, are they</p> <p>4 true to the best of your knowledge and belief?</p> <p>5 <b>A. They are, yes.</b></p> <p>6 Q. Can I ask you to confirm that reflects all of the</p> <p>7 statements you provided in regards to the</p> <p>8 Operation Shire investigation?</p> <p>9 <b>A. It does, yes.</b></p> <p>10 Q. Thank you.</p> <p>11 I am also going to ask you to be shown at this</p> <p>12 stage, please, I think the notes you made over the</p> <p>13 three-day period when you were involved as</p> <p>14 a post-incident manager. They are contained within G1</p> <p>15 bundle, please, and it is page 651.</p> <p>16 Perhaps if you move forward to 653.</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Turning over the page, please, to 655, there were blank</p> <p>19 pages in between, which is why the pagination does not</p> <p>20 follow sequentially. If you just look through those</p> <p>21 pages, please, through to 671, are those your</p> <p>22 handwritten notes made of your involvement in the</p> <p>23 post-incident procedure?</p> <p>24 <b>A. Yes, they are.</b></p> <p>25 Q. Can I ask, in terms of these notes, do they represent</p> <p style="text-align: center;">Page 113</p>	<p>1 Q. And that was, I believe, in 2011, December did you say?</p> <p>2 THE CHAIRMAN: December 2010.</p> <p>3 MS CARTWRIGHT: 2010. Can I ask then, had you had annual</p> <p>4 refresher training?</p> <p>5 <b>A. I don't know the exact date, but I do remember</b></p> <p>6 <b>undertaking some refresher training at Federation House</b></p> <p>7 <b>with the IPCC. But I don't know the exact date of that.</b></p> <p>8 Q. But did it predate this incident, in March --</p> <p>9 <b>A. Yes, it did, yes.</b></p> <p>10 Q. Thank you.</p> <p>11 Can you assist then as to your familiarity with the</p> <p>12 role of the post-incident manager, please?</p> <p>13 <b>A. At that time, I had undergone the training. I hadn't</b></p> <p>14 <b>carried out a previous post-incident management</b></p> <p>15 <b>exercise, a live exercise, other than the training I had</b></p> <p>16 <b>completed, but I was aware of the policy and procedure.</b></p> <p>17 Q. You have already mentioned your colleague, Mr Hughes,</p> <p>18 I think, was the deputy post-incident manager?</p> <p>19 <b>A. That's correct, yes.</b></p> <p>20 Q. Was he also from the Special Operations Branch?</p> <p>21 <b>A. He was, yes.</b></p> <p>22 Q. What was his rank at the time, in March 2012?</p> <p>23 <b>A. I think it was inspector.</b></p> <p>24 Q. In terms of then having never been involved in a live</p> <p>25 exercise, can you assist as to what the training</p> <p style="text-align: center;">Page 115</p>
<p>1 the total handwritten notes that you kept at the time of</p> <p>2 your involvement? There are no other notes anywhere?</p> <p>3 <b>A. The notes made by myself. There were some other notes</b></p> <p>4 <b>made at the time by my colleague, Inspector Hughes.</b></p> <p>5 Q. Thank you. But in respect of your notes, these are</p> <p>6 they?</p> <p>7 <b>A. Yes, that's correct.</b></p> <p>8 Q. We will come back to those in a little while, so you may</p> <p>9 want to put them to the side for the moment.</p> <p>10 Can you assist, please, first of all, Mr Simpson,</p> <p>11 with your role and experience within Greater Manchester</p> <p>12 Police, please?</p> <p>13 <b>A. I am now a retired officer. I joined the police service</b></p> <p>14 <b>in 1983. At the time of the incident, I was a chief</b></p> <p>15 <b>inspector within the specialist operations branch.</b></p> <p>16 Q. Thank you.</p> <p>17 When did you retire from GMP?</p> <p>18 <b>A. In 2013.</b></p> <p>19 Q. In 2012, I think you were discharging the function of</p> <p>20 a post-incident manager. Had you therefore undergone</p> <p>21 the necessary post-incident training?</p> <p>22 <b>A. Yes, that took place, I think in December 2010.</b></p> <p>23 Q. Thank you. Was that the first training you had received</p> <p>24 in post-incident investigation?</p> <p>25 <b>A. It was, yes.</b></p> <p style="text-align: center;">Page 114</p>	<p>1 involves?</p> <p>2 <b>A. The training involves classroom based theory and then</b></p> <p>3 <b>actually running through an incident and conducting role</b></p> <p>4 <b>plays.</b></p> <p>5 Q. Over what period does the training take place?</p> <p>6 <b>A. It is either a two or three day training course.</b></p> <p>7 Q. Can I ask then, in terms of the training that you had</p> <p>8 received, can you assist as to the guidance that</p> <p>9 supported or underpinned the role of the post-incident</p> <p>10 manager and post-incident procedure that you were aware</p> <p>11 of at that time?</p> <p>12 <b>A. Yes, there is a Greater Manchester Police post-incident</b></p> <p>13 <b>manual or training -- or schedule, and I think the one</b></p> <p>14 <b>that we were using at the time was about version 15 of</b></p> <p>15 <b>that.</b></p> <p>16 Q. I am going to take you to that document now, please.</p> <p>17 Sir, I am going to identify it in the policies and</p> <p>18 procedures bundle, please. It is page 469 within the</p> <p>19 policy and procedure bundle, please. For those not</p> <p>20 using that bundle, but the original location of that</p> <p>21 document, it is in C/834, commencing.</p> <p>22 I think you mentioned a version 15. Is this the</p> <p>23 version of the standard operating procedure to which you</p> <p>24 refer?</p> <p>25 <b>A. That's correct, yes.</b></p> <p style="text-align: center;">Page 116</p>

1 Q. Can I ask, in terms of then the training being in  
 2 respect of this SOP, were you also aware of the manual  
 3 of guidance?  
 4 **A. In relation to post-incident procedures?**  
 5 Q. Yes.  
 6 **A. No, I wasn't.**  
 7 Q. No. So in terms of chapter 7, as it then was, of the  
 8 relevant manual of guidance, had you ever read that  
 9 document?  
 10 **A. I can't confirm yes or no. I may or may not have done.**  
 11 Q. I am just going to take you to it, because it may be  
 12 important for some of the phases of post-incident  
 13 management set out within the guidance. Staying within  
 14 the same bundle, please, and post deployment, please,  
 15 commencing on page 366.  
 16 If I could just ask to you move through this  
 17 document from 366, which is the chapter that deals with  
 18 post-incident procedures, please, Mr Simpson, and if you  
 19 perhaps just keep following it through until you come to  
 20 pagination 370, internal pagination 701. Can you see  
 21 "Initial action" on that page?  
 22 **A. Yes, I can, yes.**  
 23 Q. Can you recall ever looking at this document now,  
 24 whether you had seen or considered the process?  
 25 There is a staged process that is set out within the

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1 guidance, and perhaps if we just keep moving through,  
 2 please, to page 383 ...  
 3 Can you see there, below the providing accounts, we  
 4 have, "Stage 1: situation report"?  
 5 **A. Yes.**  
 6 Q. "Stage 2: post-incident manager: basic facts."  
 7 **A. Yes.**  
 8 Q. Over the page, please:  
 9 "Stage 3: personal initial accounts."  
 10 Then:  
 11 "Stage 4: detailed accounts and evidential  
 12 statements."  
 13 **A. Yes.**  
 14 Q. Do you recall whether you had ever seen this guidance  
 15 and the way that the procedure is set out in the manual  
 16 of guidance prior to March 2012?  
 17 **A. Not in this format, no.**  
 18 Q. So you would be solely guided by the GMP SOP?  
 19 **A. Yes.**  
 20 Q. Can I ask, we do see within GMP's SOP -- perhaps if  
 21 I take you back to that, please. Back to 469 then,  
 22 please, Mr Simpson. Moving, then, into the introduction  
 23 of the SOP please, at page 471, we can see, at  
 24 paragraph 1.3, there is reference to:  
 25 "ACPO Manual of Guidance on the Police Use of

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1 Firearms, revised Feb 2007."  
 2 At the time of this SOP, in fact that guidance had  
 3 been superseded by the ACPO guidance from 2011. But  
 4 with having a SOP that references an ACPO guidance, had  
 5 you ever gone to look back or look for that document to  
 6 see the underpinning guidance?  
 7 **A. On this occasion I hadn't, no.**  
 8 Q. Do you recall, as part of the training, and the training  
 9 that you remember, the refresher type training, whether  
 10 the changes brought in by the ACPO 2011 were addressed  
 11 at all?  
 12 **A. No.**  
 13 Q. So, in terms of the ACPO Manual of Guidance envisaging  
 14 a four-stage process behind getting statements and the  
 15 like, proficient accounts, you weren't aware of that?  
 16 **A. Only as it is translated in the GMP document.**  
 17 Q. But I think as we look through the GMP document -- and  
 18 I don't intend to do it in detail with you now -- whilst  
 19 there is the procedure for initial facts and accounts,  
 20 it doesn't follow a similar four-stage process, does it?  
 21 **A. Not exactly, no.**  
 22 Q. Can you assist then in terms of who then contacted you  
 23 on 3 March to appoint you as the post-incident manager?  
 24 **A. I was due to come on duty at the time, at 7.00 pm, as**  
 25 **duty cover.**

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1 Q. Yes.  
 2 **A. I was made aware, shortly after that time -- I can't**  
 3 **remember the exact time, but something had gone on, so,**  
 4 **therefore, I think possibly through one of the other**  
 5 **officers, the tactical firearms commander, that I was**  
 6 **made aware that we might need a post-incident management**  
 7 **procedure putting in place, because an incident had**  
 8 **taken place in Culcheth.**  
 9 Q. Did you know at that stage that there had been a fatal  
 10 shooting?  
 11 **A. Yes, I did.**  
 12 Q. Can I ask, in terms of this essentially being your first  
 13 live job, can you assist us as to whether Mr Hughes had  
 14 any previous experience of a live post-incident  
 15 procedure?  
 16 **A. No, he hadn't.**  
 17 Q. In terms of, then, the provision of information to you  
 18 as to what had gone on, to enable you to establish  
 19 an understanding of the basic facts, and therefore to  
 20 help you and guide you in terms of an important role of  
 21 the post-incident manager in identifying principal  
 22 officers, can you assist us as to what initial  
 23 information was given to you and who provided it?  
 24 **A. I was given a very brief overview by the tactical**  
 25 **firearms commander.**

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1 Q. And that is Mr Granby?

2 **A. That's right, yes.**

3 Q. I should just mention at this stage there is a cypher

4 key on the desk, just underneath the folder. So if at

5 any time you need to refer to any of the officers, and

6 you don't know the cypher, please could you refer to

7 that?

8 **A. Okay.**

9 Q. Thank you.

10 **A. Thank you.**

11 Q. Can you assist, then, as to what Mr Granby said to you

12 by way of the background facts?

13 **A. Yes, he outlined that there had been a MASTS operation**

14 **that had taken place in Culcheth in Cheshire. That**

15 **a strike had taken place, that a shot had been fired and**

16 **someone had been fatally injured.**

17 Q. Can I ask you, if we look now -- it may be easiest to

18 use your handwritten notes, please, from 3 March, in

19 bundle G1, please, commencing at 655.

20 Can you assist us as to where you recorded the

21 initial information provided by Mr Granby?

22 **A. That is not recorded.**

23 Q. Why is that?

24 **A. At that particular time, I would have had to record it**

25 **after the event. And then very quickly things began to**

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1 **unfold, so I didn't get the opportunity to record it.**

2 Q. Can I ask, we can see within the GMP SOP, there is

3 reference to having the assistance of a loggist. Did

4 you give consideration on the night to giving someone

5 the task of being the loggist?

6 **A. That role, in part, was undertaken by Inspector Hughes.**

7 Q. Was Mr Hughes aware that that was one of his tasks, so

8 he was being the loggist?

9 **A. We had had the discussion and we asked him if he could**

10 **record things as we went along.**

11 Q. If we then perhaps use your notes, please. We can see

12 a reference to "Arrives 20.15". Is that you arriving at

13 Openshaw at 20.15?

14 **A. No, that is Q9.**

15 Q. Q9.

16 We can see in your witness statement -- and I don't

17 intend to take you to it at this stage -- but you

18 reference giving an initial brief to Q9. Again, in

19 terms of your notes themselves, there is no record of

20 what you said to Q9 as part of the initial brief. Can

21 you assist us as to what was said to him at that time?

22 **A. I explained to him that there would now need to be**

23 **a post-incident management process. I explained to him**

24 **how that process would unfold, the fact that we would**

25 **set a post-incident management suite up. But, whenever**

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1 **it was, that he would need to go there, but there he**

2 **would receive legal and welfare advice, that the IPCC**

3 **would be in attendance and managing the investigation.**

4 **And I briefed him in relation to not conferring with any**

5 **other officers.**

6 Q. Can you assist as to who Q9 was with at that time?

7 **A. To be honest, I can't remember exactly who was with him.**

8 **He had been accompanied back to Openshaw.**

9 Q. Yes.

10 You are clear that you gave Q9 a non-conferral

11 warning?

12 **A. I did, yes.**

13 Q. Can you just tell us the terms of that non-conferral

14 warning that you provided to Q9?

15 **A. In basic terms, it is that you are advised not to speak**

16 **to anybody regarding what has actually happened as part**

17 **of the incident. But if you do speak to anybody in**

18 **relation to what has occurred, that you must record that**

19 **fact. You must record what you said and why it was**

20 **necessary for you to say it, and you must declare that.**

21 Q. Was anyone else present, other than Q9, at the time you

22 were giving the non-conferring warning?

23 **A. There was another officer there because Q9's firearm was**

24 **taken from him, at that stage.**

25 Q. Who was the other officer that was with Q9?

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1 **A. I think I've got that ...**

2 **I think it has been redacted in here, in these**

3 **notes.**

4 Q. In terms of that being --

5 **A. It says, "Weapons seized", that's at 20.25.**

6 Q. In terms of another officer being with Q9, had you

7 ascertained that he had been also an officer involved in

8 events at the scene?

9 **A. I was aware that he hadn't been at the scene.**

10 Q. The Inquiry has heard evidence that in fact two other

11 officers that had been at the scene with Q9 had

12 accompanied him back to Openshaw. Can you assist as to

13 whether they were there at that time?

14 **A. To my recollection there was only myself and Q9 and the**

15 **officer that seized the weapon.**

16 Q. Can I ask, in terms of the account that Mr Granby had

17 given to you, as the TFC, were you seeking, as the

18 post-incident manager with the role of establishing the

19 facts, to seek information from anyone else at that

20 time?

21 **A. Not at that particular time because I was very quickly**

22 **busy with setting up the PIM suite, et cetera.**

23 Q. Yes, okay. Can you assist, because we know that you

24 moved to Claytonbrook to set up the PIM suite. Why did

25 you go initially to Openshaw and set the suite up at

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1 Claytonbrook?  
 2 **A. I was actually present at Openshaw at the time.**  
 3 Q. When you commenced your duties?  
 4 **A. When I commenced my duties. And I was aware that Q9**  
 5 **potentially was on his way back to Openshaw.**  
 6 **Openshaw is identified as one of the places within**  
 7 **Greater Manchester that you should consider as using as**  
 8 **a PIM suite, and that probably might have been**  
 9 **an initial consideration at that time, that we could**  
 10 **base everything from there.**  
 11 Q. Yes. Can I ask, in the ordinary course of your duties,  
 12 were you based at Openshaw?  
 13 **A. No, in the ordinary course of my duties I was based at**  
 14 **Bootle Street in the city centre.**  
 15 Q. What made you go to Openshaw then, that evening?  
 16 **A. I was due to be force duty special operations cover for**  
 17 **the evening, on the Saturday evening. It would be quite**  
 18 **normal, even though you were on telephone cover, to go**  
 19 **down to Openshaw to see what was going on across the**  
 20 **force.**  
 21 Q. We can see from the SOP that Openshaw is a place where  
 22 you can set up your PIM suite, why then was Claytonbrook  
 23 chosen as the better location rather than Openshaw?  
 24 **A. In my consideration of setting up a PIM suite, I wanted**  
 25 **it to be seen as being independent of the firearms**

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1 **command and control mechanisms, which were all based at**  
 2 **Openshaw. And, therefore, to have a remote location**  
 3 **where we could operate with some degree of isolation**  
 4 **from everything else that was going on, in the force,**  
 5 **and in particular Openshaw at that time because it had**  
 6 **been a firearms incident, I thought it best. And the**  
 7 **facilities at Claytonbrook suited the purpose.**  
 8 Q. Just excuse me for one moment, please.  
 9 (Pause)  
 10 Can I ask, whilst you were at Openshaw, were you  
 11 aware that the briefing that morning, for the firearms  
 12 officer, had taken place at Openshaw?  
 13 **A. That would be the normal procedure.**  
 14 Q. Can I ask, then, did you seek to gather any information  
 15 as to the briefing that had been given that morning  
 16 whilst you were at Openshaw as part your investigation?  
 17 **A. Not at that stage, no.**  
 18 **My main concern at that stage was managing the**  
 19 **procedure in relation to Q9. And once I had established**  
 20 **I was going to use Claytonbrook, trying to get the**  
 21 **suitable resources there and setting up Claytonbrook.**  
 22 Q. Can I ask you, please, just to be shown bundle Y, but it  
 23 is bundle Y where -- I think it is in the third bundle  
 24 now, which is 1087.  
 25 THE CHAIRMAN: Do I need this?

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1 MS CARTWRIGHT: Sir, you could perhaps just take a note of  
 2 it. I think it is a new bundle --  
 3 THE CHAIRMAN: I have Y here, actually.  
 4 MS CARTWRIGHT: Thank you. It is the new Y, sir.  
 5 THE CHAIRMAN: Is it one I haven't yet --  
 6 MS CARTWRIGHT: Yes, you will not have seen this before.  
 7 THE CHAIRMAN: Right, I have a note of the page reference  
 8 anyway.  
 9 MS CARTWRIGHT: If you could turn to page 1087 in that  
 10 bundle, please, Mr Simpson. I appreciate it is not  
 11 an email to which you were copied in, it is an email  
 12 from 23 March 2012, but there is reference to  
 13 photographs that were taken of the whiteboard in the  
 14 firearms briefing room at Openshaw on night of the  
 15 incident. If we move back a page, to 1086, there is  
 16 reference to, I think, the photographs that are attached  
 17 to that email being unable to be opened and I just want  
 18 to ask: did you see the whiteboard at Openshaw that  
 19 someone photographed or are you able to assist us as to  
 20 who was on the whiteboard?  
 21 **A. I am afraid I can't, no. And I can't recall seeing it**  
 22 **either.**  
 23 Q. I may be asking you in due course about when the  
 24 firearms officers' statements were taken on  
 25 9 March 2012. Were you involved in at that process?

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1 **A. Not at all.**  
 2 Q. Can you assist in terms of setting up the post-incident  
 3 suite at Claytonbrook, what that actually involved then,  
 4 please?  
 5 **A. The post-incident suite needs to be an area where it is**  
 6 **free from any other personnel, or you need to clear of**  
 7 **it of all personnel. You need to identify certain rooms**  
 8 **for certain functions, so you need to identify a room**  
 9 **where the IPCC may want to base themselves, where the**  
 10 **Police Federation may want to base themselves,**  
 11 **solicitors, and sufficient space and accommodation for**  
 12 **the number of officers that you anticipate attending;**  
 13 **separate rooms for key principal officers, and then**  
 14 **rooms where interviews or original accounts may need to**  
 15 **be taken and refreshment facilities, et cetera.**  
 16 Q. Can I ask then, in terms of having sufficient rooms  
 17 available, did you have a view at that time as to how  
 18 many rooms you would need for the number of officers  
 19 involved?  
 20 **A. It was a rough guess at that stage, and I assessed that**  
 21 **the lay out of the training wing at Claytonbrook would**  
 22 **be sufficient for that purpose.**  
 23 Q. In terms of your rough guess at that time, what was the  
 24 rough guess?  
 25 **A. It would probably be at least six or seven rooms,**

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1 **potentially. The main one, having a room big enough to**  
 2 **accommodate 12, 13, 14, offers.**  
 3 Q. Can I take you back to your handwritten notes, please,  
 4 at G1/655. You have made an entry, at 20.40,  
 5 referencing a Cheshire officer, Geraint Jones. Can you  
 6 assist as to the contact you had with Mr Jones at that  
 7 time, please?  
 8 **A. I think it was just a very brief conversation to --**  
 9 **I think he had been appointed as the SIO by Cheshire and**  
 10 **it would be along the lines of that I was going to be**  
 11 **the post-incident manager within GMP.**  
 12 Q. Can I ask then, as a post-incident manager with the  
 13 involvement and role that you would have in terms of  
 14 securing the scene, did you give any direction in  
 15 respect of that?  
 16 **A. No, he confirmed steps were being taken in Cheshire to**  
 17 **secure the scene.**  
 18 Q. We can see, alongside the entry relating to  
 19 Geraint Jones, you have, then, the column that runs top  
 20 to bottom where you have reference to "GMP FWIN". Can  
 21 you assist us to why you have recorded "GMP FWIN" there?  
 22 **A. It is most likely that at that point as well I made**  
 23 **a call to the force duty officer about securing the GMP**  
 24 **FWIN, and making sure that in effect everything that**  
 25 **should have been recorded on there -- well, that that**

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1 **would be required for evidential purposes.**  
 2 Q. Do you remember who the force duty officer was?  
 3 **A. No, I don't recall.**  
 4 Q. Do you recall getting a response back as to whether  
 5 there was a GMP FWIN?  
 6 **A. No, I don't.**  
 7 Q. But you were, essentially, if there was a FWIN, looking  
 8 to secure that?  
 9 **A. Yes, I think, at that stage, I was possibly running**  
 10 **through my mind all the things that I might initially**  
 11 **try and need to secure for a later stage.**  
 12 Q. We can then see reference to 20.55, Federation Karl  
 13 Thurogood and Kieran -- is it Murray?  
 14 **A. That's correct, yes.**  
 15 Q. Can you assist as to the dealings with the Police  
 16 Federation at that time and what the discussions were?  
 17 **A. I think at that time it would have just been that they**  
 18 **arrived, they must have arrived at Openshaw at that**  
 19 **stage. And I just identified myself to them and what**  
 20 **role I would be undertaking.**  
 21 Q. Had you any previous experience of those two  
 22 individuals?  
 23 **A. Yes, I think I had probably met them both during the**  
 24 **refresher training.**  
 25 Q. Refresher training for post-incident procedure?

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1 **A. Yes.**  
 2 Q. We then see, at 21.05, reference to the briefing in the  
 3 briefing room at Openshaw, and I think you have recorded  
 4 a number of names. Were each of these individuals  
 5 present at that briefing at Openshaw?  
 6 **A. Yes, they will have been.**  
 7 Q. We have Mr Sweeney, Superintendent Giladi, is it Chief  
 8 Superintendent Kelly?  
 9 **A. Yes.**  
 10 Q. What is the name underneath that, please?  
 11 **A. Chief Inspector Lawler.**  
 12 Q. Lawler; Damien Morley, welfare; Y19; Federation Karl and  
 13 Kieran, I think we have mentioned a moment ago, yes?  
 14 **A. Yes.**  
 15 Q. In terms of that briefing, can you assist as to what was  
 16 covered in the briefing?  
 17 **A. I think that was basically a situation report on where**  
 18 **we were up to.**  
 19 Q. What was the situation report? Where were you up to at  
 20 that time?  
 21 **A. Basically that the incident had taken place in Culcheth,**  
 22 **that Q9 had already got back to GMP and that his weapon**  
 23 **had been seized, and I had spoken to him about the**  
 24 **post-incident procedure; that I confirmed with the**  
 25 **senior officers present that it was my intention to**

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1 **undertake the role of post-incident manager. And**  
 2 **I think I have put there:**  
 3 **"Agreed protocols."**  
 4 **And that was basically that, as the PIM, I needed to**  
 5 **be able to act relatively independently of the chain of**  
 6 **command.**  
 7 Q. Can I ask, in terms of in particular ACC Sweeney, were  
 8 you aware that he was the gold commander of the  
 9 operation?  
 10 **A. I wasn't at that stage, obviously, when I went into the**  
 11 **briefing, but I was when I came out.**  
 12 Q. Can you assist by way of the factual background and  
 13 understanding, can you recall whether ACC Sweeney gave  
 14 you any factual background to inform your investigation?  
 15 **A. No.**  
 16 Q. Similarly, in respect of Chief Inspector Lawler, who had  
 17 been the TFC the day before, did Chief Inspector Lawler  
 18 give you any details as to his involvement?  
 19 **A. No, he didn't.**  
 20 Q. Y19, who had been the TA of the operation, did Y19 give  
 21 you any information as to his involvement?  
 22 **A. No, he didn't.**  
 23 Q. Were you seeking any information from these individuals  
 24 at that time, to inform your investigation?  
 25 **A. I think, at that time, I had been given a brief overview**

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1 **by the TFC, so I knew the basic facts of what had gone**  
 2 **on. My main concern realistically, then, was keeping**  
 3 **that meeting as brief as I could do, so that I could go**  
 4 **and set up a post-incident management suite.**  
 5 **I was aware that potentially officers were beginning**  
 6 **to be transported back to GMP and there was a need to**  
 7 **get a grip of the situation in relation to setting the**  
 8 **suite up as soon as possible.**  
 9 Q. Yes.  
 10 Mr Simpson, I asked you these questions because we  
 11 see from your statements, but also from your handwritten  
 12 notes on the night, it does not seem that you take  
 13 action in respect of, or haven't responded to the fact  
 14 that a CSDC had been discharged on the night of 3 March.  
 15 Because certainly in respect of the officer X9 that  
 16 discharged special munitions, there doesn't seem to be  
 17 any consideration of that or treatment of him as  
 18 a principal officer.  
 19 **A. No, but I wasn't aware of that at the time.**  
 20 Q. So you were not made aware that CSDC had been discharged  
 21 as part of the operation?  
 22 **A. No.**  
 23 Q. Again, in terms of the relevant facts, it was relevant  
 24 and important to ascertain what weapons or special  
 25 munitions had been discharged, would you agree?

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1 **A. Yes.**  
 2 Q. That is important because it leads to who you identify  
 3 as a principal officer?  
 4 **A. Yes, it does.**  
 5 Q. Your information is that your investigation and  
 6 establishment of the facts didn't bring that to your  
 7 attention?  
 8 **A. Not at that stage, it didn't.**  
 9 Q. When it did it come to your attention?  
 10 **A. The fact that the CS had been used was not really**  
 11 **brought to my attention throughout the whole process.**  
 12 Q. Throughout the whole of your involvement?  
 13 **A. Hmm.**  
 14 Q. We can see that you did get initial accounts -- and we  
 15 will come on to deal with this in a little bit more  
 16 detail -- from Z15, who discharged the Hatton rounds, Q9  
 17 as the principal officer and X7 as the OFC, and both Q9  
 18 and X7, in their initial accounts, do make reference to  
 19 CSDC, CS gas, being discharged. Did you consider their  
 20 initial accounts that were provided to you, I think in  
 21 the early hours of 4 March, around 4.00?  
 22 **A. I think it was probably about 4.00 or 5.00 in the**  
 23 **morning, at that stage. It was assessed jointly that we**  
 24 **didn't need to speak to anybody else immediately.**  
 25 Q. Can I ask, because I think you answered a moment ago

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1 that as part of your involvement, as the post-incident  
 2 manager, did didn't come to your attention about the  
 3 CSDC?  
 4 **A. No, it didn't.**  
 5 Q. But if we look an in the initial accounts, there is  
 6 reference to the CS gas being discharged. So can I just  
 7 be clear: did you read those accounts and identify that  
 8 had taken place?  
 9 **A. I am sure I read the accounts, but it didn't become**  
 10 **apparent that we needed to treat that officer as**  
 11 **a principal at that time.**  
 12 Q. Can I just be clear then, in terms of an officer, that  
 13 discharges special munitions, why would that individual  
 14 not need to be treated as a principal officer?  
 15 **A. With hindsight, then that potentially should have been**  
 16 **the case.**  
 17 Q. But that is important and that is what is envisaged by  
 18 even the GMP SOP, that anyone that has discharged  
 19 weapons, they should be treated as a principal officer.  
 20 Would you agree?  
 21 **A. Yes, I agree with you, yes.**  
 22 Q. Turn then back to the briefing you have just told us  
 23 about. When you have made reference to agreed protocols  
 24 as part of a number of bullet points that appear there,  
 25 what are the protocols that have been agreed with, those

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1 including the gold commander, Y19 and Mr Lawler?  
 2 **A. The main protocol, as far as I was concerned, as**  
 3 **I mentioned before, was that I would be the PIM and that**  
 4 **I would seek to set up a post-incident management suite.**  
 5 **That was it, as far as I was concerned.**  
 6 Q. But, again, in terms of setting up a post-incident  
 7 management suite, that is to then facilitate a process,  
 8 having identified who the principal officers are,  
 9 a process of getting initial accounts from those  
 10 officers, would you agree?  
 11 **A. I do in a manner, but quite often, as events unfold,**  
 12 **that is when the actual identification of the principal**  
 13 **officers actually becomes apparent. At a later stage in**  
 14 **the process, once you have set up the suite and you can**  
 15 **calm everything down and try and see exactly what has**  
 16 **gone on and what the sequence of events were.**  
 17 Q. Okay.  
 18 Can you assist in terms of then the reference in the  
 19 next briefing, and I think we cannot see the timing of  
 20 that entry. I think it is by the second hole-punch.  
 21 But can you help as to what the reference to "next  
 22 briefing" is?  
 23 **A. I think at that stage there may have been an agreement**  
 24 **that everybody got back together at a later stage, to**  
 25 **see where we were up to with the process.**

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1 Q. Is that a later stage that evening?  
 2 **A. I would presume so. The same as you, I can't --**  
 3 THE CHAIRMAN: It looks as though it may be the early hours  
 4 of the morning, from what can be made out of the time.  
 5 MS CARTWRIGHT: I think if we look below -- I am just asking  
 6 about that because if we look at the timings in your  
 7 notes, the entries below that is 21.35. We then have  
 8 an entry at 2.00 in the morning, 2.23, and if you go  
 9 over the page, to 657, we then move back to 23.50. So  
 10 can you assist as to the order of creating the notes  
 11 because it does seem the times move forward and  
 12 backwards?  
 13 **A. The only thing I can assume there is that I have gone on**  
 14 **to the next page, and then when I have gone back to my**  
 15 **notebook again I have gone back on to the wrong page, if**  
 16 **you see what I mean.**  
 17 Q. In terms of the entry on 655, which deals with the 21.35  
 18 briefing:  
 19 "Tony Hughes move to Claytonbrook. Q9 post-incident  
 20 management suite set up. Meet Cath Bates, IPCC."  
 21 We have a statement from Cath Bates, I think she  
 22 talks about arriving at about 10.40. Can you assist us  
 23 with any clarity as to when Cath Bates of the IPCC  
 24 attended?  
 25 **A. That might be about the right time. So it may be that**

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1 **I did the notes out of order. I can't remember the**  
 2 **exact time that Cath Bates arrived. It may be in**  
 3 **Inspector Hughes' notes.**  
 4 Q. But, again, in terms of the role of the post-incident  
 5 manager, it is right, isn't it, that they should be  
 6 recording all of these key entries; who they had  
 7 discussions with; when, where and what is discussed. So  
 8 there is almost a clear log of the events as they  
 9 unfold, and then decision that are made that inform  
 10 decisions that a post-incident manager has to make?  
 11 **A. Yes.**  
 12 Q. Yes. We don't have that degree of detail in your notes.  
 13 **A. Not in my notes, which is why, at this stage, I began to**  
 14 **realise I was spinning a lot of plates and, therefore,**  
 15 **having Inspector Hughes there to start making notes as**  
 16 **things progressed would make life a lot easier and make**  
 17 **sure that we got as many things written down as we could**  
 18 **do.**  
 19 Q. Can you assist then as to the briefing that was given to  
 20 Cath Bates when she arrived as the essentially  
 21 independent investigator, also for the IPCC, to be able  
 22 to inform her as to your understanding of what had taken  
 23 place and the facts that you had ascertained at that  
 24 time?  
 25 **A. Rather than doing that at that initial time, when she**

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1 **arrived, I introduced myself as the post-incident**  
 2 **manager and actually took her round the rooms that we**  
 3 **had set up. I was aware that other people were arriving**  
 4 **all the time and so, probably, it wasn't the appropriate**  
 5 **time to sit down and start going through absolutely**  
 6 **everything with Cath Bates.**  
 7 **So I think my initial contact with her really was**  
 8 **restricted to going round the post-incident management**  
 9 **suite and making sure that the IPCC were satisfied with**  
 10 **the facilities we had set up to manage the process.**  
 11 Q. But can you assist then, in terms of at that stage had  
 12 you identified who the principal officers were?  
 13 **A. No, I hadn't.**  
 14 Q. So can you assist then as to the process that led to you  
 15 identifying who were to be the principal officers?  
 16 **A. Obviously I knew about Q9. At some stage, I will have**  
 17 **been made aware of who the operational firearms**  
 18 **commander was.**  
 19 Q. Yes. X7?  
 20 **A. X7. And, then, potentially anybody else who was brought**  
 21 **to my attention in relation to discharge the -- a**  
 22 **firearm.**  
 23 Q. In terms of Z15 being identified, that was because he  
 24 had discharged the Hatton rounds, yes?  
 25 **A. Yes.**

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1 Q. But can you assist, because part of the role of the  
 2 post-incident manager, it is to understand the role that  
 3 each firearms officer has played, would you agree?  
 4 **A. I agree to a certain degree. I think that my**  
 5 **interpretation of a post-incident management is to**  
 6 **ensure that, as far as possible, a structured and**  
 7 **transparent power -- process is put in place, to**  
 8 **facilitate the facts to come to the fore. And that you**  
 9 **are working as part of an overall team in bringing and**  
 10 **understanding exactly what has gone on.**  
 11 Q. Can I ask you, please, to look at the notes that  
 12 Cath Bates created as to how she understood the  
 13 principal officers were to be identified. It is in your  
 14 bundle, please, behind tab 6. It is page 652, please.  
 15 Before do doing that, can I take you to 651. We can  
 16 see there, the entry at 11.00, as to the brief update  
 17 that you provided to Cath Bates at around 11.00:  
 18 "Officers on MASTS exercise. Three men in a car,  
 19 strike one fatally shot. Officers on duty since  
 20 4.30 am. Happened in Critchley (query?) Cheshire."  
 21 Pausing there, did you have knowledge at that stage  
 22 that the incident had happened in Culcheth?  
 23 **A. Yes.**  
 24 Q. "One officer discharged weapons. Weapon taken off him  
 25 at scene. Weapon at Openshaw. Officer with it.

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1 Officer principal at Claytonbrook. Other officers  
 2 currently at Openshaw on way to Claytonbrook."  
 3 Yes?  
 4 **A. Yes.**  
 5 Q. Does that fit with your recollection of the detail you  
 6 provided at that time?  
 7 **A. It does now I've read, yes. Thank you.**  
 8 Q. If you turn over the page, please, we can then see as we  
 9 move through Cath Bates' notes, at the top of the page,  
 10 with reference to the PIM suite being set up. Then  
 11 reference to:  
 12 "The download processes is videoed in hand and SOCA  
 13 en route."  
 14 Can you assist, Mr Simpson, that is videoing of the  
 15 process of the firearms officers essentially returning  
 16 their weapons?  
 17 **A. Yes.**  
 18 Q. Again, in terms of that requirement, was that  
 19 a requirement you set out or the IPCC?  
 20 **A. Looking at those notes, there, that is the IPCC.**  
 21 Q. Can you assist then, again for 11.00 on this page, we  
 22 have reference to pseudonyms:  
 23 "Agreed all officers can use pseudonyms tonight but  
 24 emphasise we cannot guarantee anonymity at inquest  
 25 et cetera. No issues raised re this by Fed or

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1 post-incident manager."  
 2 Can you recall your involvement in respect of that  
 3 process?  
 4 **A. That is obviously a reflection of the conversation that**  
 5 **took place.**  
 6 Q. Can you assist then in terms of the entry at 11.25,  
 7 because it sets out:  
 8 "Advised by Karl Thurogood, soles will be resistant  
 9 to providing individual accounts. Peter Orr spoke to  
 10 assistant PIM [I think] re principal officers.  
 11 Principal and silver, all others not principals, unless  
 12 standing next to him."  
 13 Do you recall that?  
 14 **A. I wasn't privy to that conversation with Karl Thurogood.**  
 15 Q. Can you assist, were you aware at that stage that Q9 and  
 16 Mr Granby were to be principal officers?  
 17 **A. Yes, I think those are the two that could be identified**  
 18 **at that fairly early stage, and had been backed by**  
 19 **myself by then, yes.**  
 20 Q. Can you assist then, moving into the evening and the  
 21 early hours, why Mr Granby didn't get treated as  
 22 a principal officer?  
 23 **A. I think Mr Granby was -- came to the PIM suite and was**  
 24 **sat down, and I don't know why we didn't take an initial**  
 25 **account from him on the night, but he was at the**

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1 **post-incident management suite.**  
 2 Q. In terms of you saying you don't know why "we didn't  
 3 take an initial account on the night", was that  
 4 something you would have expected, in terms of the  
 5 evidence you have just given?  
 6 **A. I think that the theory being that -- I don't want to**  
 7 **speculate too much, but this is five years ago, so I am**  
 8 **trying to remember my thought processes at the time, but**  
 9 **everything Mr Granby would have done would have been**  
 10 **either tape recorded or recorded on a live log, at the**  
 11 **time. So the immediate need to secure that sort of**  
 12 **evidence from him wasn't quite probably as urgent as the**  
 13 **operational officers who had been deployed on the**  
 14 **ground.**  
 15 Q. Can I ask then, in terms of having an awareness that  
 16 there were live logs that silver commander and TFC would  
 17 complete, did you give consideration as part of your  
 18 understanding of the basic facts to inform your decision  
 19 as to who the principal officers should be, as to  
 20 seeking Mr Granby's TFC log?  
 21 **A. I think we stated that the logs would have to be seized**  
 22 **as part of the evidential process.**  
 23 Q. Do you recall who you said that to?  
 24 **A. No, I don't, no.**  
 25 Q. Similarly, in terms of following that through, did you

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1 give any other consideration in terms of seeking the  
 2 gold commander's log?  
 3 **A. I think the gold commander, as well, who, we had already**  
 4 **said previously, I knew by then was Mr Sweeney, he was**  
 5 **brought to or he came to the post-incident management**  
 6 **suite. And, similarly to Mr Granby, that those logs**  
 7 **would need to be seized at some stage.**  
 8 Q. Again, so the same principle would apply to the TA's  
 9 log?  
 10 **A. Potentially, yes.**  
 11 Q. Can you assist with this then, please, on the same page  
 12 at 652, there is the reference to:  
 13 "All others not principals, unless standing next to  
 14 him."  
 15 Can you assist as to who set that out? Would that  
 16 have been you or your assistant post-incident manager?  
 17 **A. As I said before, I think this was a conversation**  
 18 **between Karl Thurogood and Cath Bates that I was not**  
 19 **privy to.**  
 20 Q. In terms of identification of who is the principal  
 21 officers, that is not a role for a Police Federation rep  
 22 that is your role as the --  
 23 **A. It is, yes.**  
 24 Q. Were you aware there had been discussion about the  
 25 principals would include those standing next to him,

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1 I think meaning Q9 the shooter?  
 2 **A. No, I wasn't.**  
 3 Q. You were not?  
 4 **A. No.**  
 5 Q. Because, again, in terms of that being agreed or  
 6 discussed, to that extent, you would need to know who  
 7 was next to Q9 at the time he discharged his weapon,  
 8 would you agree?  
 9 **A. I agree, yes.**  
 10 Q. So, as part of the investigation, it should have  
 11 established who was in the vehicle with Q9 at the time?  
 12 **A. Potentially, yes.**  
 13 Q. So, to that extent, W4, who was in the vehicle at the  
 14 time, essentially in front of Q9, on this recording,  
 15 should have been treated as a principal officer also,  
 16 would you agree?  
 17 **A. According to Karl Thurogood, but not myself at that time**  
 18 **because I was not privy to this conversation.**  
 19 Q. Did you become aware in that evening that Karl Thurogood  
 20 was essentially directing -- if this note is correct --  
 21 who were to be principals and who was not and,  
 22 similarly, who would be providing initial accounts and  
 23 who wouldn't.  
 24 **A. I was not aware of that but, obviously, I was not --**  
 25 **because of the other tasks that I was undertaking, I was**

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1 **not omnipresent wherever the IPCC were.**  
 2 Q. I appreciate that. But, again, even looking at the GMP  
 3 SOP and leaving aside the manual of guidance and the  
 4 process you say you were not aware of, it is embedded in  
 5 even the GMP SOP that initial factual accounts are  
 6 obtained, yes?  
 7 **A. That was not the original question that you asked me.**  
 8 **You asked me if I was aware of these conversations**  
 9 **taking place and I wasn't.**  
 10 Q. Yes.  
 11 **A. I am aware of identifying principal officers and that**  
 12 **initial accounts should be taken from them, yes.**  
 13 Q. Yes.  
 14 So then, not being aware of this entry and this  
 15 discussion, what thought process did you apply to  
 16 identifying who would be the principal officers?  
 17 **A. As I said previously, it would be Q9, the operational**  
 18 **firearms commander and the other officer at that stage**  
 19 **who had discharged --**  
 20 Q. The Hatton rounds.  
 21 **A. -- the Hatton rounds.**  
 22 Q. Z15?  
 23 **A. Z15.**  
 24 Q. Can I ask, please, going back into your handwritten  
 25 notes, please, at page 657, we can see a reference at

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1 23.50 to J3, who is no longer --  
 2 THE CHAIRMAN: Sorry, 657?  
 3 MS CARTWRIGHT: 657, sir.  
 4 THE CHAIRMAN: 23.50.  
 5 MS CARTWRIGHT: Top of the page, top left of 657.  
 6 THE CHAIRMAN: It may be that it has been missed in the  
 7 photocopy process, I've have:  
 8 "Coroner aware ..."  
 9 That's the first line on that page, 657.  
 10 MS CARTWRIGHT: Can I check, G1/657.  
 11 THE CHAIRMAN: That is where I have gone wrong. Thank you.  
 12 Right. Yes. I have it, thank you.  
 13 MS CARTWRIGHT: You can see reference in your notes to  
 14 23.50, J3 I think, who is now -- let me check. I am  
 15 correct. It is Mr Nutter and a reference to a policy  
 16 decision. What was the discussion with Mr Nutter at  
 17 that time?  
 18 **A. Looking at the points that I have made there, it would**  
 19 **be the appropriate process for unloading and collection.**  
 20 **I am not a hands-on firearms expert, so therefore it**  
 21 **would be: what is the appropriate process? And: what do**  
 22 **we need to include? And, as we have outlined there, it**  
 23 **is the magazines, the chambers load, the loaded**  
 24 **chambers, et cetera.**  
 25 Q. There are three almost bullet points that then appear

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1 below that, namely: legal advice; who to; time limits;  
 2 initial factual notes; OFC overview; principals first.  
 3 Does that relate to your discussion with J3?  
 4 **A. I think that is more notes to myself of what**  
 5 **considerations I need to have moving forward.**  
 6 Q. Then, in terms of deciding which officers then should be  
 7 identified as principal officers and having legal  
 8 advice, had you formulated your view at that time?  
 9 **A. Yes.**  
 10 Q. Can I ask you then, in terms of having identified those  
 11 to be treated as principal officers, what steps you then  
 12 took in terms of all the other firearms officers that  
 13 had been deployed that evening, into Culcheth, of  
 14 getting their initial factual accounts from them? So  
 15 they are not principal officers, but asking them to make  
 16 their brief factual notes as to their involvement that  
 17 evening.  
 18 **A. I think the main thing that we tried to facilitate was**  
 19 **the safe retrieval of all the weapons. And we**  
 20 **discovered that the whole thing now was beginning to**  
 21 **take a long time, that we were getting late into the**  
 22 **evening and early into the morning. And I can't**  
 23 **remember exactly what time it took place without going**  
 24 **through all the notes, but there would have been**  
 25 **a discussion as to what we felt that we had -- what we**

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<p>1 <b>needed to prioritise, which accounts we needed to</b>                  2 <b>prioritise and get those recorded. And then the</b>                  3 <b>timescales, potentially, for getting written accounts or</b>                  4 <b>initial accounts off all of the others who were</b>                  5 <b>concerned and whether in fact that would be achievable</b>                  6 <b>without running, potentially, into mid morning of the</b>                  7 <b>next day.</b>                  8 Q. But, in terms of the process of essentially the officers                  9 giving back their weapons taking a long time, is that                  10 because it was being done one at a time?                  11 <b>A. That's correct.</b>                  12 Q. In terms of them whilst those other officers who had not                  13 been identified as principal officers, was there not                  14 a direction given to them, that they should use that                  15 time to make their brief factual accounts?                  16 <b>A. No, there wasn't.</b>                  17 <b>I think one of the considerations was if each of</b>                  18 <b>those officers had wanted to seek Federation, legal or</b>                  19 <b>welfare advice prior to doing that, the welfare debrief</b>                  20 <b>for each officer would have taken at least 10 minutes</b>                  21 <b>before -- so, once again we were moving further and</b>                  22 <b>further forward, and that why it was decided that we</b>                  23 <b>would concentrate the -- our efforts on those three</b>                  24 <b>officers that we'd identified.</b>                  25 Q. Can I be clear then, in terms of the decision, or not</p> <p style="text-align: center;">Page 149</p>	<p>1 or located, what the officer did and what the officer                  2 saw and heard. It may be relevant, depending on the                  3 circumstances, to include initial factual notes and                  4 indication as to why the discharge of firearms was                  5 considered necessary. This would be in order to assist                  6 in the investigation."                  7 Leaving aside the discharge relating to Q9, did you                  8 have an appreciation on that evening as to who had been                  9 in the alpha car, who had been in the bravo car, who had                  10 been in charlie, who had been in delta, where they all                  11 went, where they were at the time Q9 discharged the                  12 weapon?                  13 <b>A. No, I didn't, no.</b>                  14 Q. To that extent then, in terms of officers who would have                  15 been near or seen Q9's actions, were you informed then                  16 as to whether or not there should have been a wider                  17 remit as to principal officers if you didn't have                  18 that basic understanding?                  19 <b>A. I wasn't advised about that, no.</b>                  20 Q. You weren't?                  21 Again then, in terms of you identifying principal                  22 officers, if you don't have a basic understanding as to                  23 where the officers were at the time Q9 discharged the                  24 weapon, and appreciation of you gathering all the                  25 relevant information as to those near to Q9 at that</p> <p style="text-align: center;">Page 151</p>
<p>1 seeking initial accounts from those officers, that                  2 wasn't -- if we look at the notes where it seems that                  3 Karl Thurogood is saying the officers are resistant to                  4 providing them -- that wasn't influencing you not                  5 seeking it from the officers?                  6 <b>A. I was not aware that the officers were resistant in</b>                  7 <b>providing -- I found the officers sort of compliant</b>                  8 <b>throughout the whole process.</b>                  9 Q. In terms of you not seeking to provide an initial,                  10 brief, factual account, it is just the logistics of                  11 evening. Is that the position?                  12 <b>A. That's correct, yes.</b>                  13 Q. So you never arrived at a situation where you sought it                  14 from them and they said, "Actually, I want to take                  15 advice" or "I want to speak to my Police Federation                  16 rep"?                  17 <b>A. Not directly, no.</b>                  18 Q. Can I just ask you, please, to look in the GMP SOP, back                  19 in the policy and procedures bundle.                  20 If I can ask you to turn to page 478, please, in                  21 terms of the guidance, at paragraph 5.12, relating to:                  22 "Initial factual notes should be concise where                  23 relevant to actions taken by the officer completing the                  24 notes. It should cover what operation or incident the                  25 officer is engaged with, where the officer was standing</p> <p style="text-align: center;">Page 150</p>	<p>1 time, how could you properly determine who should be the                  2 principal officers if you don't have that basic                  3 understanding?                  4 <b>A. I think I made the best of it I could on the evening.</b>                  5 Q. Can I ask you back into your handwritten notes, please.                  6 I am not going to through into every entry. But in                  7 terms of surveillance teams that had been deployed that                  8 evening, we do see reference being given to the briefing                  9 being given to the surveillance teams. Page 657,                  10 please.                  11 What understanding do you have about surveillance                  12 teams and surveillance officers being present on                  13 3 March?                  14 <b>A. Throughout the evening I became aware that obviously</b>                  15 <b>there was quite a large surveillance operation</b>                  16 <b>surrounding the firearms operation as well. And that</b>                  17 <b>those officers had made their way back to Greater</b>                  18 <b>Manchester. And I think that they were all -- they were</b>                  19 <b>at Openshaw, in a separate part of the complex from</b>                  20 <b>firearms wing.</b>                  21 Q. So, in terms of your briefing at 2.00 in the morning in                  22 respect of the surveillance teams, what did that                  23 briefing involve?                  24 <b>A. It basically outlined that the post-incident management</b>                  25 <b>process was taking place and that I was the PIM. And it</b></p> <p style="text-align: center;">Page 152</p>

1 **was to give all those officers an overview that**  
 2 **obviously, a very serious incident had occurred and they**  
 3 **should treat it accordingly, and what processes would**  
 4 **follow after that.**  
 5 Q. In terms of the same processes that would follow, what  
 6 was actually said in terms of what practically that  
 7 would mean for the surveillance officers?  
 8 **A. Well, practically, they should treat this as a now**  
 9 **ongoing investigation into somebody being killed.**  
 10 Q. Were the surveillance officers asked to give an initial  
 11 factual account as to their involvement on 3 March?  
 12 **A. I think the steps I took at that stage were to seize --**  
 13 **or not seize, but take hold of some of their logs that**  
 14 **they had kept during the evening.**  
 15 Q. Can I ask, then: were you able to ascertain that there  
 16 had been two particular surveillance officers who had  
 17 been involved very shortly before the MASTS strike moved  
 18 on to the car park?  
 19 **A. No.**  
 20 Q. Can I ask you to turn over the page, please, to page 659  
 21 in your notes. We know that Jim Donaghy of the IPCC  
 22 came and almost took over from Cath Bates. We can see,  
 23 at 6.00 in the morning, you reference provision of  
 24 exhibits to Mr Donaghy. I think that included the  
 25 surveillance log from the surveillance team, and then

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1 also provided with the statements from Z15 and Q9. You  
 2 reference:  
 3 "Brief conversation regarding outstanding actions  
 4 prior to stand down. No requests made."  
 5 Can you assist with any more details in terms of the  
 6 discussions you had with Jim Donaghy of the IPCC at that  
 7 time?  
 8 **A. I think, obviously, Mr Donaghy had been present**  
 9 **throughout the evening, so he had been aware of all the**  
 10 **actions that we had undertaken throughout the evening.**  
 11 **So it was a clarification of where we had got up to and**  
 12 **then basically saying to him: if you agree, then we will**  
 13 **start to close down the initial phase of the**  
 14 **post-incident management and send the officers away.**  
 15 **But, before we did that, was there anything else**  
 16 **glaringly that he thought that we needed to achieve**  
 17 **before we set it down?**  
 18 Q. You have recorded, "No request made", but would it be  
 19 fair to say that you were not telling Mr Donaghy at that  
 20 time that CSDC had been discharged by an officer?  
 21 **A. I didn't know at that time.**  
 22 Q. Was Mr Donaghy aware though that there was only the  
 23 three initial accounts that had been provided that night  
 24 from Q9, X7 and Z15?  
 25 **A. He was fully aware. In fact, he was present through the**

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1 **whole process during the evening.**  
 2 Q. I think then, at about 7.00 in the morning, that  
 3 concluded your involvement on that evening, the 3rd into  
 4 the 4th, but then you had ongoing involvement on  
 5 5 March.  
 6 Before doing that, can I just take you to an email  
 7 that the deputy Mr Hughes sent, I think reflecting the  
 8 post-incident management procedure thus far. It is back  
 9 in the Y bundle, at page 945, please.  
 10 THE CHAIRMAN: That is the original Y bundle or the new one?  
 11 MS CARTWRIGHT: It is the new one, sir, please.  
 12 THE CHAIRMAN: 955?  
 13 MS CARTWRIGHT: 945.  
 14 THE CHAIRMAN: 945 is the reference.  
 15 MS CARTWRIGHT: Thank you.  
 16 We can see you were copied into this email. Was  
 17 there any reason why Mr Hughes sent the email rather  
 18 than it coming from you, as the post-incident  
 19 management?  
 20 **A. I can't honestly tell you what conversation we had.**  
 21 **We -- probably I said to him, "Can you document**  
 22 **everything and just keep everybody up to speed with**  
 23 **where we are".**  
 24 **But if I put my hand on my heart, and I'm being**  
 25 **absolutely honest with you, I can't remember**

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1 **a conversation about this email.**  
 2 Q. We can see reference within the email to the briefing  
 3 given to the firearms officers, I think around 11.35,  
 4 and we see it also, I think, referenced in your notes.  
 5 What were the officers said by way of those that had not  
 6 provided accounts, when they would be sought from them  
 7 and when they should be provided?  
 8 **A. I think at the -- potentially, at the 11.35 briefing,**  
 9 **I would have been outlining to them the whole process.**  
 10 **Potentially, at that stage, I may have said to them,**  
 11 **"You may be required this evening to give an initial**  
 12 **account". But I can't say whether -- I didn't record**  
 13 **it, so I can't say whether I did or didn't.**  
 14 **And basically outlining to them what had happened**  
 15 **about the weapon recovery process, et cetera, et cetera.**  
 16 **And, obviously, reminding them about not conferring, and**  
 17 **also the fact that we would be calling on welfare and**  
 18 **the Police Federation to come out.**  
 19 Q. You mentioned there, in giving that answer, that -- and  
 20 repeated to them about non-conferring. I think so far  
 21 we have only heard about you giving the warning to Q9?  
 22 Was it this occasion, the first time you gave the  
 23 non-conferral warning to all the other officers?  
 24 **A. That potentially would have been the first time I had**  
 25 **them all together.**

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1 Q. Are you clear you gave to each of those officers present  
 2 a warning not to confer with respect to their  
 3 recollection of events in relation to creation of  
 4 statements or accounts?  
 5 **A. Yes.**  
 6 Q. Can I ask you to turn to your statement, behind tab 8,  
 7 please. It is page 237 of your statement, behind tab 8,  
 8 please.  
 9 **A. That is the wrong one, isn't it?**  
 10 THE CHAIRMAN: Yes, you want your own bundle which is  
 11 a relatively small. It may be the one you have there,  
 12 just in front of --  
 13 **A. I have found it now, sir. Thank you very much.**  
 14 MS CARTWRIGHT: Thank you. We can see you have recorded at  
 15 23.35 hours that evening:  
 16 "I briefed all of the firearms officers who had been  
 17 involved in the incident, to which the process related.  
 18 The officers were located together in an allocated room  
 19 within suite. I outlined purpose of the process and how  
 20 it would be conducted. I outlined the guidance in  
 21 relation to conferring with others before making their  
 22 initial or subsequent accounts."  
 23 Just pausing there, that was saying they shouldn't  
 24 be conferring in respect of either initial or subsequent  
 25 accounts?

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1 **A. That's correct.**  
 2 Q. You then go on:  
 3 "This full process was repeated at 1.00 in the  
 4 morning, together with the Police Federation  
 5 representatives."  
 6 Can you assist us as to what the purpose was then  
 7 repeating that at 1.00 in the morning? What was  
 8 happening at 1.00 in the morning?  
 9 **A. I don't think anything in particular was happening at**  
 10 **1.00 in the morning, but I would think I was conscious**  
 11 **of the fact of keeping the officers informed as to what**  
 12 **was happening. And it was -- I probably saw it as**  
 13 **an opportunity to remind them about not conferring.**  
 14 Q. But, again, just in terms of you having reference within  
 15 the statement here about initial accounts or subsequent  
 16 accounts, can you recall whether officers were being  
 17 asked then to provide initial accounts?  
 18 **A. I hadn't asked any officers to make initial accounts at**  
 19 **that stage.**  
 20 Q. Again, in terms of the 1.00 in the morning, when  
 21 repeating the process as it sets out in your statement,  
 22 had you given any guidance or direction to them at that  
 23 stage as to when they would be required to provide their  
 24 initial accounts?  
 25 **A. To be honest with you, I don't think I did because**

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1 **I think things were still unfolding in relation to how**  
 2 **we were going to facilitate weapon retrieval, et cetera.**  
 3 Q. Are you is able to assist, because in terms of the  
 4 principle officers, they have the involvement and  
 5 assistance of legal representatives, but are you able to  
 6 assist us as to whether any of the other officers that  
 7 night identified as having a legal representative for  
 8 them or making submissions on their behalf?  
 9 **A. Not as far as I am aware. It is most likely that they**  
 10 **would have been informed or spoken to the Police**  
 11 **Federation representatives about that.**  
 12 THE CHAIRMAN: Ms Cartwright, I am going to give the witness  
 13 a break at some point this afternoon.  
 14 MS CARTWRIGHT: Now is convenient, because I'm going to move  
 15 on the 5 March.  
 16 THE CHAIRMAN: Are we going to finish this afternoon?  
 17 MS CARTWRIGHT: Yes, sir.  
 18 THE CHAIRMAN: 3.35.  
 19 MS CARTWRIGHT: Thank you, sir.  
 20 (3.30 pm)  
 21 (A short adjournment)  
 22 (3.37 pm)  
 23 MS CARTWRIGHT: Mr Simpson, before moving to 5 March, can  
 24 I just ask about an entry that is in one of the PSB  
 25 officers' notebook, Mr Brennan please, which we will

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1 find in bundle R, at page 608, please.  
 2 (Handed)  
 3 608, please.  
 4 It is your second volume of R, sir.  
 5 **A. Yes, right. It is somewhere around.**  
 6 THE CHAIRMAN: Do I need it?  
 7 MS CARTWRIGHT: I think if you have it, sir. Otherwise,  
 8 just for your reference, if you record R/608.  
 9 THE CHAIRMAN: It is probably somewhere in this mountain,  
 10 but at the moment I can't lay my hands on it, I am  
 11 afraid. R/608.  
 12 MS CARTWRIGHT: Thank you.  
 13 It is the 11.00 entry, please, Mr Simpson. It is  
 14 slightly difficult to decipher the handwriting, but it  
 15 appears to read, "Claytonbrook":  
 16 "I spoke to Anthony Simpson and Tony Hughes (PIMs)  
 17 re recording of weapons recovery. They have no  
 18 objections, providing it does not [something] the  
 19 process [I contacted?] ... who will continue the  
 20 examination."  
 21 Can you recall, do you have a recollection of the  
 22 the recording?  
 23 **A. I hadn't before I read this. I mean, I have no reason**  
 24 **to disbelieve that that conversation took place around**  
 25 **that time.**

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1 Q. Can you assist as to what the entry is where it says:  
 2 "They have no objections providing it does not ...  
 3 [something] process."  
 4 What did you have no objections to and what was the  
 5 proviso from your recollection?  
 6 **A. I mean, I can't remember precisely, and I don't want to  
 7 speculate too much.**  
 8 Q. No.  
 9 **A. But it would be likely at that time that we would have  
 10 a conversation about which weapons needed to be  
 11 recovered, how many weapons needed to be recovered and  
 12 what method we would use to recover those weapons.**  
 13 Q. Yes.  
 14 **A. I wouldn't image it would normally be a contentious  
 15 issue because it would be accepted that we would have  
 16 to. I think if you look purely at the guidance, it  
 17 doesn't go into great detail realistically about the  
 18 forensic recovery of weapons. But I think that, when we  
 19 have been on the training course and the refresher  
 20 course, it lent towards the best possible practice in  
 21 relation to that because it seems to have been one of  
 22 the more contentious issues, and forensically it is very  
 23 important. So it may have been around that that we  
 24 agreed absolutely all the weapons need to be recovered  
 25 through a set procedure and process and in the right**

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1 way.  
 2 Q. Yes.  
 3 **A. But the bit about "provided", it does not -- I can't  
 4 make that out.**  
 5 Q. Is it, "Cause delay in the process"?  
 6 **A. It could do. Now you have said that, it looks like that  
 7 is what it says, yes.**  
 8 Q. I am just wondering then, because you have told us it  
 9 did become a very long process, whether or not you then  
 10 gave some thought process around those that needed to be  
 11 recorded. Because, obviously, you could ascertain who  
 12 had discharged weapons and who hadn't in terms of then  
 13 the importance of who was videoed returning the weapons  
 14 and proper allocation of time as to what is the priority  
 15 here?  
 16 **A. At that stage, obviously, we were considering what was  
 17 the best way to move forward in the weapon recovery.  
 18 Obviously, at a later stage, discussions had taken place  
 19 and a decision had been made that we would use the same  
 20 method of recovery for all the officers rather than ...  
 21 In essence, I think once you have decided that you  
 22 are going to set up that methodology for the recovery of  
 23 weapons, you need to be able to run it all the way  
 24 through because if you start, in practical terms, using  
 25 two different methods for recovery of weapons, you**

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1 **almost need double the resource, rather than just  
 2 running everybody through a system that you have set up.  
 3 And I think I was very conscious at that stage as well,  
 4 that if you apply one principle to the recovery of one  
 5 weapon, then ideally you need to do that all the way  
 6 through because you have got it recorded then.**  
 7 **And if, at that stage, you can check which  
 8 ammunition has or has not been used, and it is all  
 9 recorded through the same process and it is videoed. So  
 10 I think that's the easiest way to do it, so it can be  
 11 tied back to when the officers first came on duty and  
 12 were issued with weapons earlier in the evening.**  
 13 Q. Can we move then, please, your involvement on 5 March.  
 14 If I take you to your witness statement behind tab 7,  
 15 please. It is page 234, please. On the Monday, you  
 16 attended in the afternoon, at the Openshaw complex,  
 17 where you saw J3 of the TFO. In terms of going to  
 18 Openshaw on 5 March was that for the purposes of  
 19 gathering exhibits and information?  
 20 **A. Yes, I think it was to collect the recording of the  
 21 electronic briefings, et cetera.**  
 22 Q. I think also you collected the PowerPoint as well?  
 23 **A. Yes.**  
 24 Q. You tell us in your witness statement that they were  
 25 then provided to Mark Bergmanski, but did you keep any

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1 copy of the PowerPoints or of the audio of the briefing,  
 2 on 3 March?  
 3 **A. No, I didn't.**  
 4 Q. You just handed those over?  
 5 **A. I just handed it all over to the IPCC.**  
 6 Q. Can I ask, in terms of your role as a post-incident  
 7 manager in gathering exhibits, did you have any  
 8 involvement in respect of directions relating to  
 9 exhibits to be seized from the red Audi?  
 10 **A. No, none whatsoever.**  
 11 Q. What was your understanding as to who was managing the  
 12 process of exhibit recovery from the red Audi?  
 13 **A. That was being conducted by the Cheshire Constabulary.**  
 14 Q. Similarly, as post-incident manager and the scene at  
 15 Culcheth, did you have any involvement at all in respect  
 16 of preservation of the scene or the setting of the  
 17 cordon at Culcheth?  
 18 **A. No, I didn't.**  
 19 Q. Again, in your understanding who was having  
 20 responsibility for that?  
 21 **A. It was probably through Detective Superintendent Jones.**  
 22 Q. Jones. Can I take you back then to work through your  
 23 notes, because I think your statements do not address  
 24 reference or potential contact from the PFOA, but then  
 25 also potential from the officer involved in the Duggan

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1 shooting. Perhaps if we can just work through your  
 2 notes, please.  
 3 **A. Yes, certainly.**  
 4 Q. So, 5 March, notes start at page 659, at 10.00 on  
 5 5 March. Can I just be clear, because your statement  
 6 talks about the afternoon, but we see your notes have  
 7 10.00. Is your statement correct or did it happen  
 8 earlier in the day?  
 9 I do apologise:  
 10 "On morning of Monday, I attended afternoon ..."  
 11 **A. Yes, I have noticed that error there.**  
 12 **Sorry, was that the statement at 7?**  
 13 Q. Yes, behind tab 7, page 234.  
 14 THE CHAIRMAN: Yes, there is obviously something wrong with  
 15 that sentence, isn't there? It refers to both the  
 16 morning and the afternoon.  
 17 **A. Yes.**  
 18 **I am making the assumption there that I actually**  
 19 **attended in the morning, because all the other timings**  
 20 **are in the morning.**  
 21 THE CHAIRMAN: The notes are the morning, aren't they?  
 22 MS CARTWRIGHT: Yes. So is it you went off at 7.00 on  
 23 4 March, on the Sunday, and then you were back on duty  
 24 about three hours later?  
 25 THE CHAIRMAN: No.

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1 **A. Sorry, this was the Monday morning, not the Sunday.**  
 2 THE CHAIRMAN: Yes, this would be more than 24 hours.  
 3 MS CARTWRIGHT: Yes, I do apologise.  
 4 THE CHAIRMAN: 27 hours.  
 5 MS CARTWRIGHT: Can I ask you then, at page 659, we see  
 6 again then recording, below 10.00:  
 7 "Openshaw, Mike Lawler, day 3."  
 8 Then a number of points, 1 to 6:  
 9 "Status of officers, 1. 2, status of commanders.  
 10 Three TAC --"  
 11 Is it --  
 12 **A. "TAC advisers."**  
 13 Q. "4, vehicles."  
 14 What is after that, please? Team?  
 15 **A. "Team ready to collect."**  
 16 Q. "5, weaponry. 6, timescale for statements. Who by?"  
 17 Are these, 1 to 6, referencing discussions that were  
 18 had between Mike Lawler and Mr Nutter?  
 19 **A. I think, most likely, that is points for myself to make**  
 20 **sure that I discussed with them.**  
 21 Q. Do you recall then with the status of officers and  
 22 status of commanders, were you still thinking at that  
 23 stage as to who should be principal officers?  
 24 **A. Potentially. I honestly can't remember whether it was**  
 25 **that or where we were up to with the welfare of the**

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1 **officers concerned.**  
 2 Q. Can you assist us, when we see, at 6:  
 3 "Timescale for statements. Who by?"  
 4 How was that resolved?  
 5 **A. I don't think it had been resolved, at that stage.**  
 6 **And, obviously, as the PIM, I wouldn't necessarily**  
 7 **be then further involved in the taking of statements, so**  
 8 **it was just a case of me, I think, asking the question:**  
 9 **when are the statements going to be taken?**  
 10 Q. Do you recall what Mr Lawler and Mr Nutter said back to  
 11 you about that?  
 12 **A. I don't think there was a specific timescale set at that**  
 13 **time.**  
 14 Q. Can we see below that there is:  
 15 "Audio briefing, Mike, one from night and retain  
 16 others safely."  
 17 Were you aware at this stage there had been lots of  
 18 other briefings as part of Operation Shire?  
 19 **A. Potentially. I -- if it was an ongoing investigation,**  
 20 **or operation -- sorry -- I was aware that each briefing**  
 21 **would have been recorded as we had gone through. And it**  
 22 **was probably just a note to make sure that the previous**  
 23 **ones were not destroyed.**  
 24 Q. Can I ask you then, we see below that "welfare", and  
 25 then in brackets "(PFOA)". Below that:

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1 "Consistency, continuity and familiarity."  
 2 Then:  
 3 "T/SD."  
 4 What does that relate to?  
 5 **A. That is the welfare debrief that normally takes place.**  
 6 **Usually up to about 28 days after the incident. The**  
 7 **reference there is to Damien Morley, who is actually the**  
 8 **chief welfare officer for Greater Manchester Police at**  
 9 **that time.**  
 10 Q. But what does the abbreviation T/SD stand for?  
 11 **A. It is TISD.**  
 12 Q. TISD?  
 13 **A. It is set out in the acronym section of the guidance.**  
 14 Q. The SOP?  
 15 **A. Yes.**  
 16 THE CHAIRMAN: Itself an acronym.  
 17 **A. I apologise, it is quite a long time since I have used**  
 18 **these acronyms.**  
 19 **MS CARTWRIGHT: No.**  
 20 **The acronyms are set out at page 514, but I can't**  
 21 **see TISD as one of them within the policy. Perhaps if**  
 22 **you want to just turn up in the policy, at page 514.**  
 23 **A. That is this one, isn't it?**  
 24 **It may then be -- there is a section -- there is**  
 25 **a flowchart outlining the welfare actions. There we go,**

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1 on page 504.  
 2 Q. Thank you.  
 3 A. **"Traumatic incident, stress debrief, 7 to 28 days**  
 4 **later."**  
 5 Q. Thank you. Can I just take you back to the acronyms  
 6 please, because we can see IIO that is an official  
 7 identified within the manual of guidance of having  
 8 a role to play within the post-incident procedure.  
 9 Who was the initial investigating officer in respect  
 10 of your involvement, as the post-incident manager?  
 11 A. **As far as I was aware, that potentially was Mr Brennan.**  
 12 Q. Mr Brennan of the PSB?  
 13 A. **PSB, yes.**  
 14 Q. What made you think Mr Brennan was discharging the  
 15 function of IIO.  
 16 A. **I think because of the conversations that we had on the**  
 17 **evening and, obviously, his interest in the way we were**  
 18 **running the process and I was aware that also,**  
 19 **potentially, he was having conversations with the**  
 20 **Cheshire Constabulary in relation to the scene at**  
 21 **Culcheth.**  
 22 Q. Thank you.  
 23 Can I take you then back over to page 661 of your  
 24 notes, please, at bundle G1. You refer to a review  
 25 panel in accordance with the post-incident procedure and

1 then with a question mark. What is the review panel and  
 2 the function of the review panel?  
 3 A. **Reading this now, I can't honestly remember what the**  
 4 **purpose of the review panel is in relation to the policy**  
 5 **and process. I can only presume, and once again it**  
 6 **would be an assumption on my behalf, that the whole**  
 7 **processes -- we review the whole process almost in the**  
 8 **form of a debrief, because -- do we need to do anything**  
 9 **else? Have we missed anything? Do we need to pick up**  
 10 **on anything? Could we have done anything better?**  
 11 Q. We then see a reference again to statements where legal  
 12 advice timescale and, again, no answer to the questions,  
 13 but it being revisited again. Then, below that, we see  
 14 reference to the logs for the TFC and the SFC. Did you  
 15 take any step, on 5 March, to retain or obtain those?  
 16 A. **I think, at that stage, I was given assurance that those**  
 17 **would be seized.**  
 18 Q. Who was that assurance given by?  
 19 A. **It was following the meeting with Mike Lawler, so**  
 20 **I presume that he had spoken with professional standards**  
 21 **and that process was being undertaken.**  
 22 Q. But, again, in terms of those logs being at Openshaw,  
 23 I think where the firearms officers were based, they  
 24 were located there, weren't they? Or they would have  
 25 been located there, the logs?

1 A. **They would have been if the officers concerned had**  
 2 **brought them back to Openshaw, at that stage.**  
 3 Q. And it is your recollection that Mr Lawler gave you  
 4 an assurance that they would be seized?  
 5 A. **Yes.**  
 6 Q. But then we see, below that, reference to  
 7 Karl Thurogood, "PFOA", what is next to that? Is it  
 8 "V"?  
 9 A. **No, I'm not too sure on that. It is my writing as well,**  
 10 **so I apologise for that.**  
 11 Q. Then:  
 12 "J3, Mr Nutter."  
 13 Then it records:  
 14 "Visiting, Thursday, Mark Williams. May bring  
 15 Duggan officer."  
 16 Who was telling you then at that stage about a visit  
 17 by the PFOA on the Thursday, where the officer involved  
 18 in the Duggan shooting attending potentially with the  
 19 PFOA?  
 20 A. **Looking at the notes, because I have no real**  
 21 **recollection of it at this time, I can't say whether**  
 22 **that was part of the conversation I was having with**  
 23 **Mike Lawler, or whether because I have written down**  
 24 **Karl Thurogood's name, that it was a conversation I had**  
 25 **had with Karl Thurogood. I honestly cannot remember.**

1 Q. Can I ask, in terms of that visit and obviously  
 2 a potential officer who had been involved in another  
 3 shooting incident, at a time when there has been no set  
 4 date for the officers in Shire to have provided their  
 5 accounts, and the potential for any such meeting to  
 6 impact upon the statements or the way the statements  
 7 would be given by the officers. Did you give any  
 8 consideration as to the wisdom of, or any views you  
 9 would have as to the appropriateness of a meeting with  
 10 the PFOA and an officer who had been involved in the  
 11 Duggan shooting being in attendance?  
 12 A. **I didn't express any views either way. I made the**  
 13 **assumption that it was part of the overall welfare**  
 14 **process that would follow up, just normal -- was normal**  
 15 **for this type of incident.**  
 16 Q. But again, did you give any consideration to say, "Well,  
 17 actually, the officers should give their initial  
 18 accounts, first, before anything like that takes place",  
 19 or even provide their witness statements before this  
 20 takes place?  
 21 A. **I didn't. I didn't express a view either way.**  
 22 Q. Again, so as of 5 March, had you any -- as  
 23 a post-incident manager -- appreciation as to when the  
 24 firearms officers, other than the principal officers,  
 25 would be providing initial accounts to you to inform

1 your investigation?

2 **A. As of 5 March, and at that time, it was my clear**

3 **understanding that I would be -- the PIM in the purest**

4 **form, realistically, is to take care of the first**

5 **initial actions, so first 12, maybe 24 hours, but**

6 **thereafter it is handed over to the overall mechanism**

7 **and the investigation teams and the IPCC, to take over**

8 **the investigation from that point. So, from a PIM point**

9 **of view, I would be stepping back from that, and I would**

10 **be allowing it to take its normal course of action.**

11 Q. Can I ask, did you make any contact with the IPCC as to

12 the suggestion of this meeting with the PFOA and the

13 officer from Duggan?

14 **A. I, personally, have no recollection of discussing that**

15 **with them.**

16 Q. But, again, in terms of the PIM who does have the

17 responsibility for the initial period, those initial

18 two days or so of the process, in terms of the GMP SOP

19 indicating a requirement for initial factual accounts,

20 and then if we look at manual of guidance, certainly

21 envisaging initial accounts given as part of the stage 3

22 process, and then moving to stage 4 and the provision of

23 the witness statements, had you given any thought or

24 direction as to when those initial accounts should be

25 provided during the period of time that you were

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1 involved as the PIM?

2 **A. Realistically and, to be honest, the period of time of**

3 **my involvement ended at 7.00 on the Sunday morning, when**

4 **I'd seen it through that first period of time. And that**

5 **was my understanding, and still is my understanding, of**

6 **what the post-incident management process is about. It**

7 **is about trying to take control and put some systems in**

8 **place for the initial period following such an incident.**

9 **So, therefore, to be honest with you, beyond that,**

10 **it was collecting some bits that I had identified as**

11 **still outstanding, but then leaving it over to the**

12 **overall investigation teams that were going to take**

13 **over.**

14 Q. Who, in your mind, after 7.00 on 4 March, was directing

15 matters? Who, in your mind, was taking all of that

16 forward?

17 **A. I was aware there was going to be a gold meeting,**

18 **a strategic meeting from GMP, probably chaired by --**

19 **I don't know the assistant chief constable and deputy**

20 **chief constable at that time. And that the strategy,**

21 **overall investigation strategy, would be set and it**

22 **would move forward from there with people who it was**

23 **their specific expertise to conduct such investigations.**

24 Q. Can I take you, then, to 6 March, these are your notes

25 at page 669, please. Were you present at the gold

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1 meeting?

2 **A. Yes, I went to the gold meeting.**

3 Q. You went in terms of performing the duties of the

4 post-incident manager?

5 **A. Yes.**

6 Q. Did you relay, as part of that gold meeting, that

7 initial accounts had not been provided by essentially

8 the lion's share of the officers who had been involved

9 on the night?

10 **A. I would have probably done it the other way round, and**

11 **have done which initial accounts had been taken.**

12 Q. So identifying that there would be -- so then the three

13 initial accounts, but beyond that there were no other

14 accounts that had been obtained, you would have fed that

15 into the gold meeting?

16 **A. Yes.**

17 Q. In terms of item 4, we can see reference to:

18 "DSU, Andy Peach, all involved accounts."

19 Then:

20 "Staff, Rob Cousen. Interviews may be required."

21 At any point on the 3rd into 4 March, did you give

22 consideration as to seeking an initial account or

23 a statement from the SIO, Mr Cousen?

24 **A. No. I wouldn't see that realistically as part of my**

25 **post-incident management process or responsibilities.**

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1 Q. But, again, in terms of him being a source of

2 information where you could ascertain facts to inform

3 your investigation, did you give any consideration to

4 that?

5 **A. I don't see the post-incident management process as --**

6 **it is partly based around investigating, but it is the**

7 **main part of it is to, as far as you can, set out clear**

8 **and transparent processes to ensure that as much**

9 **evidence as possible is gained at the time that is**

10 **available to you. But it is not my role, or it wasn't**

11 **the role of post-incident manager -- it would be**

12 **completely impossible to start commencing**

13 **an investigation at that time, a full investigation.**

14 Q. Yes. Can you assist then, we can see in your notes of

15 the gold meeting reference to:

16 "Command logs needed by IPCC (query?). When by?

17 PSB to supply."

18 So, again, you have already told us about your

19 recollection that Mr Lawler gave an assurance that the

20 log would be seized. Can you recall what the timescale

21 was, when it was raised at the gold meeting, on 6 March,

22 as to the need for those logs to be seized and obtained

23 and when they were going to be provided?

24 **A. No, obviously I had just made a note of it, making the**

25 **assumption that it was confirmed that PSB would be**

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1 **undertaking the securing of that evidence.**  
 2 Q. Yes, and in terms of who from PSB was present at that  
 3 gold meeting, I think you have already referenced  
 4 Mr Brennan, was he involved at that gold meeting?  
 5 **A. Having not got the minutes of the gold meeting, I am**  
 6 **afraid I can't throw any light on that.**  
 7 Q. No.  
 8 Over the page, please, you have set out a to-do list  
 9 at page 671, which included:  
 10 "To ring Rob Cousen and Andy Peach."  
 11 Was that to take forward obtained statements?  
 12 **A. No, I think, realistically, that was to just update them**  
 13 **as to my position and, obviously, I had had**  
 14 **an involvement in the process and, potentially, I was**  
 15 **handing everything over.**  
 16 Q. Then, at 3, you record:  
 17 "Joint briefing. PSB and the PIM."  
 18 Did a joint briefing take place?  
 19 **A. No.**  
 20 Q. Why didn't it take place?  
 21 **A. I honestly don't know. I can't recall that.**  
 22 Q. We can then see, at 4:  
 23 "Debrief. What did Duggan do?"  
 24 Again, did you do anything in respect of looking at  
 25 the Duggan incident?

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1 **A. No, I didn't.**  
 2 Q. If we see below that, please, we have your 11 -- is it  
 3 11.35 or 11.55 entry?  
 4 **A. Probably 35, I think.**  
 5 Q. Again, we see reference to:  
 6 "Detective Inspector Peach, DSU, update re IPCC  
 7 investigation, timescales, interviews/accounts,  
 8 Federation involvement."  
 9 Pausing there, again we can see it raised,  
 10 interviews and accounts, but no record as to what the  
 11 resolution was going to be as to when you were going to  
 12 get those?  
 13 **A. As I said before, I probably just discussed it with him,**  
 14 **but the point being that it is not -- it wasn't my**  
 15 **responsibility at that stage to secure interviews and**  
 16 **accounts. That would have been the responsibility of**  
 17 **the investigation team appointed by the gold commander.**  
 18 **So I think at that stage I was just probably**  
 19 **speaking to him and saying, "Look, these are the**  
 20 **things -- I have been to the gold meeting, these are the**  
 21 **things that you need to be considering and be ready**  
 22 **for".**  
 23 Q. Yes.  
 24 We can see reference to:  
 25 "Confirms welfare visiting re debrief tomorrow am."

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1 Are you able to help us anymore about that entry?  
 2 **A. I can only assume that is from the conversation with**  
 3 **inspector peach, who at the end of the conversation had**  
 4 **said to me that welfare were going to go and see his**  
 5 **surveillance officers the following day.**  
 6 Q. Can you assist us then with the next entry, the 12.57  
 7 entry about a text message to Mr Granby:  
 8 "Advise re single point of contact."  
 9 Then, can you help us with the entries that follow,  
 10 is it PSB?  
 11 **A. Yes, at PSB, yes.**  
 12 Q. Can you assist us as to what that relates to and  
 13 what --  
 14 **A. Once again, just literally going off the notes there,**  
 15 **I must have sent a text message to Mark Granby. Almost**  
 16 **part of this hand over process, to say there is now**  
 17 **a spot been appointed at Professional Standards Branch.**  
 18 Q. I am not going to deal with the next entry.  
 19 But, essentially, this then concludes your  
 20 involvement as a post-incident manager?  
 21 **A. It did, yes.**  
 22 Q. Finally, I appreciate you have already told the Inquiry  
 23 that you had no involvement with the 9 March, when  
 24 statements were involved. But, for completeness, can  
 25 I just ask if you can assist us at all from your

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1 recollection of these days, when you were involved, just  
 2 with an entry relating to 9 March, please. It is within  
 3 the Y bundle, at page 1041. We can see it is an email,  
 4 9 March 2012, at 6.25 in the morning, from John Brennan  
 5 to Mark Bergmanski of the IPCC. It records:  
 6 "Mark the firearms officers from last Saturday's  
 7 incident saw the members of the Association of Police  
 8 Firearms yesterday. As a result they now do not wish to  
 9 provide statements on audio to the IPCC, but intend to  
 10 commence writing their own accounts within the law later  
 11 today or tomorrow. My understanding is that as a group  
 12 they are unlikely to change from this position. I will  
 13 contact you later when I have more information."  
 14 In terms of there being reference to audio  
 15 statements to be given to the IPCC, was there any  
 16 discussion about that during the period when you were  
 17 the post-incident manager?  
 18 **A. No.**  
 19 MS CARTWRIGHT: Thank you, Mr Simpson. Those are my  
 20 questions.  
 21 Questions from MR THOMAS  
 22 MR THOMAS: A few questions, sir.  
 23 Mr Simpson, I represent Mr Grainger's family.  
 24 Just a few topics with you, if I may. Your role as  
 25 the post-incident manager, would you agree that you are

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1 there to ensure the integrity of the evidence in the  
 2 initial period, after an incident such as this? Would  
 3 you agree?  
 4 **A. Yes, sir. Yes.**  
 5 Q. In terms of ensuring the integrity of the evidence, in  
 6 those first 24/48 hours you are aware that is a really  
 7 important time in terms of evidence gathering, isn't it?  
 8 **A. Yes.**  
 9 Q. Now, this was a serious incident, you cannot get much  
 10 more serious than a member of the public, albeit  
 11 a subject being shot. You didn't secure the initial  
 12 accounts from a number of police officers. In fact, you  
 13 didn't ask for the initial accounts for a number of the  
 14 police officers. That is correct, isn't it?  
 15 **A. Yes, that's correct.**  
 16 Q. Looking back on it now, do you think you should have?  
 17 **A. Looking back on it now, I am still of the opinion that,**  
 18 **given how things unfolded on the night, that I possibly**  
 19 **didn't have time or facilities to take the initial**  
 20 **accounts off all of the officers, and that's why**  
 21 **I prioritised the ones that I did.**  
 22 Q. Didn't you ask for help?  
 23 **A. I think I had as much help as I could get at that time**  
 24 **in the morning.**  
 25 Q. Did you ask for additional help?

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1 **A. I was aware that I had as much assistance as I could get**  
 2 **at that time.**  
 3 Q. But that was not enough, that is what you are saying?  
 4 **A. I think it is a question of how much time was available**  
 5 **with the other tasks that we had to undertake to secure**  
 6 **vital evidence, such as the recovery of weapons,**  
 7 **et cetera.**  
 8 Q. Forgive me, in terms of a very important part of your  
 9 role, that is preserving the accounts and making sure  
 10 the accounts are down, that is the reason why it is in  
 11 the policies and procedures, you are saying you were  
 12 limited because of manpower, effectively, if I have  
 13 understood your evidence correctly. Is that right?  
 14 **A. No, I think I am saying I am limited in the amounts of**  
 15 **what you can do in one night with that number of people.**  
 16 Q. Yes. Sorry, I don't mean to dance on the head of a pin,  
 17 that comes down to manpower, doesn't it?  
 18 **A. That is your interpretation of it.**  
 19 Q. Well, I am asking you for your interpretation.  
 20 **A. I gave you that.**  
 21 Q. Let's unpick it. What do you mean?  
 22 **A. I mean that I -- on the night I had to try and secure**  
 23 **all the weapons, in a forensic manner, and I had to,**  
 24 **from my point of view, obtain what I saw where initial**  
 25 **accounts from the officers who were primarily involved**

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1 **in the discharge of weapons at the scene.**  
 2 Q. Well, you say primarily, an important part -- just  
 3 looking at this, an important part of this in relation  
 4 to how a man ended up being shot, just looking at and  
 5 thinking about it, must have involved the operation and  
 6 the planning. Do you agree or do you disagree?  
 7 **A. I agree.**  
 8 Q. All right. Just thinking about it, and I am still  
 9 trying to unpick why you were unable to think about it,  
 10 a statement from the key officers, including Mr Cousen,  
 11 for example -- he was a key officer. Do you agree?  
 12 **A. I agree, yes.**  
 13 Q. He wasn't asked, was he?  
 14 **A. No.**  
 15 Q. No. So when you say you were unable -- I repeat the  
 16 question: is that because you felt you didn't have  
 17 enough assistance, you couldn't be in two places at  
 18 once? That is what I am asking you.  
 19 **A. My understanding of the post-incident management**  
 20 **procedures, at that time, was that there would be no**  
 21 **expectation for me to seek to obtain a statement from --**  
 22 **I think he was a detective inspector from the**  
 23 **investigation side of it, and that that would be, no**  
 24 **doubts, undertaken in the fullness of time, when**  
 25 **the full investigation was launched. Probably the day**

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1 **after, or the day after that.**  
 2 Q. Help me with this -- I am moving on slightly, one step  
 3 in another direction. Had you had sufficient ability,  
 4 in terms of whatever it was that was preventing you from  
 5 taking these initial accounts from a number of these  
 6 officers?  
 7 Do you agree that the parameters, in terms of the  
 8 officers giving their accounts, would include the  
 9 officer being monitored while they do their accounts?  
 10 In other words, somebody overseeing the officers, to  
 11 ensure no conferring?  
 12 **A. Potentially, yes.**  
 13 Q. Yes.  
 14 All right, did you put that into place? Even though  
 15 you were unable to take their statements in the way that  
 16 you would have done had you had the resources, did you  
 17 ensure that when the officers eventually gave their  
 18 accounts, somebody was monitoring? I am not talking  
 19 about somebody from the Police Federation, and I am not  
 20 talking about the officer's own lawyers, I am talking  
 21 about somebody like yourself, there monitoring the way  
 22 that the statements and the officers gave their  
 23 accounts. That is something that you could do as  
 24 a post-incident manager, isn't it?  
 25 **A. I'm sorry, is this on night itself?**

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1 Q. I am talking about the initial accounts. If the initial  
 2 accounts were done on the night, you would have had to  
 3 have supervised that, correct? Being the post-incident  
 4 manager.  
 5 **A. I would have had to facilitate it, yes.**  
 6 Q. In terms of facilitating it, that would ensure that the  
 7 accounts, when they are taken, are done in a way that is  
 8 transparent and accords with the non-conferring rules,  
 9 for example.  
 10 In other words, to cut a long story short, you  
 11 wouldn't just put all the officers in one room and say,  
 12 "There you go lads, you write your accounts and you  
 13 stand outside until they do it", would you?  
 14 **A. No, I wouldn't do that.**  
 15 Q. So, coming back to my question, bearing in mind you are  
 16 saying you didn't have the resources on the night  
 17 because of the number of officers, what provisions did  
 18 you put into place that when the officers did do their  
 19 first accounts -- and we know that those first accounts,  
 20 the majority of them took place some six days later --  
 21 what provisions did you put in place to ensure that  
 22 those accounts would be adequately supervised when they  
 23 were taken? Help us.  
 24 **A. I no longer had responsibility for the process at that**  
 25 **stage.**

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1 Q. I understand that you no longer had responsibility, but  
 2 shall not my question. I am asking you: as the  
 3 post-incident manager, for the time that you were, did  
 4 you put into play any provision? So when these  
 5 statements are taken, they are taken in this way?  
 6 **A. No.**  
 7 Q. Why not?  
 8 **A. Because it wasn't my responsibility to do that if it**  
 9 **would have been taken subsequent to the post-incident**  
 10 **management procedure.**  
 11 Q. All right.  
 12 New topic.  
 13 You knew that there was going to be a meeting with  
 14 the PFOA and the officer in Duggan, because you made  
 15 a note of it, correct?  
 16 **A. Correct.**  
 17 Q. There is no note, is there, in your notes, of you  
 18 discussing it or discussing that arrangement with the  
 19 IPCC, is there?  
 20 **A. No.**  
 21 Q. So you didn't discuss it with the IPCC? It is not  
 22 a question of you not recalling discussing it with the  
 23 IPCC, in answer to a question from Ms Cartwright, you  
 24 didn't discuss it with the IPCC because, had you  
 25 discussed it with the IPCC, you would have noted it?

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1 **A. Not necessarily, no.**  
 2 Q. Well, it is quite an important issue, isn't it? It is  
 3 not usual for an officer who is involved in another  
 4 incident, an incident that sparked a riot across the  
 5 country, to come down and speak to officers from  
 6 a different force. It is quite a memorable thing, isn't  
 7 it?  
 8 **A. Sorry, your question, sir, is?**  
 9 Q. The Duggan officer was involved in an incident that  
 10 sparked riots across this country, correct? You were  
 11 aware of that.  
 12 **A. I am aware of that.**  
 13 Q. It is not usual for an officer from a different force to  
 14 come up, especially one involved in such an incident, to  
 15 speak to officers in a different force?  
 16 **A. I don't know what is or is not usual in those**  
 17 **circumstances.**  
 18 Q. Well, it is not something you had come across before, is  
 19 it?  
 20 **A. Well, fortunately this was -- well, unfortunately**  
 21 **though, this was the only incident I had ever dealt with**  
 22 **of this nature.**  
 23 Q. So help us: do you think you raised that with the IPCC?  
 24 **A. I can't remember.**  
 25 Q. Indeed, if you turn to the policy and procedure bundle,

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1 page 504, there is a whole procedure -- are you there?  
 2 **A. Yes, I am.**  
 3 Q. There is a whole procedure, there, dealing with GMP, so  
 4 Greater Manchester's police's policies and procedures  
 5 dealing with the welfare of its own officers, correct?  
 6 **A. Yes.**  
 7 Q. Fully set out, and had been fully set out before this  
 8 incident, correct?  
 9 **A. Yes.**  
 10 Q. I would be right in thinking that you have -- what was  
 11 his name, Damien Morley? Who is chief welfare officer  
 12 of GMP.  
 13 **A. Yes.**  
 14 Q. When an incident like this happens, GMP have the  
 15 foresight so that there are counselling services should  
 16 officers need it, correct?  
 17 **A. Yes, that's correct, yes.**  
 18 Q. So, in fact, in terms of officers needing welfare  
 19 advice, GMP has all that covered within its own force,  
 20 correct?  
 21 **A. Yes, correct.**  
 22 Q. So didn't you think it was odd, then, that the officer  
 23 in Duggan is going to come and discuss welfare when GMP  
 24 already has that covered?  
 25 **A. The only thing I can say in relation to that -- and**

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<p>1 <b>I don't want to be obscure on this, but I was aware of</b>  2 <b>the welfare arrangements being put in place by GMP. It</b>  3 <b>was obviously mentioned when I went to the Tactical</b>  4 <b>Firearms Unit. I think it was on 5 March, and it was</b>  5 <b>something additional that had been considered by the</b>  6 <b>Police Federation.</b>  7 Q. But you didn't think to ask: hang on a second, what  8 welfare is going to be discussed?  9 You didn't query what, did you?  10 <b>A. No, no, I didn't.</b>  11 Q. There you are, you are a monitor, a manager, to ensure  12 proper transparency and things are done like that. Do  13 you think you did your job properly?  14 <b>A. I did my job to the best of my ability.</b>  15 Q. But that is not the question I asked you. Do you think  16 you did your job properly?  17 <b>A. Yes, I do think I did my job properly.</b>  18 MR THOMAS: That is all I ask.  19 Questions from MR WEATHERBY  20 MR WEATHERBY: Mr Simpson, I represent Mr Grainger's  21 partner, Gail Hadfield-Grainger.  22 Can I start with the GMP procedures and ask you to  23 look at the policy and procedures bundle where that is  24 set out, at 469 onwards. Do you have that?  25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 189</p>	<p>1 <b>A. Yes.</b>  2 Q. Then, 1.3, you have been taken to, that refers to the  3 manual.  4 Then, 1.4, as you have told us:  5 "A main principle, clear, transparent and legally  6 sound guidance."  7 Yes? Something that you had in mind.  8 <b>A. Yes.</b>  9 Q. 1.6:  10 "The overriding aim of post-incident procedures  11 would be to reveal a true account of the incident."  12 Yes?  13 <b>A. Yes.</b>  14 Q. So all of that is a building block for what you were  15 doing on the night, yes?  16 Then this, at 1.7:  17 "Any incident that involves a discharge of a firearm  18 by police has the potential to affect all those  19 involved. The term 'Principle officer' would normally  20 be used to describe those AFOs who either fired shots  21 [that is the easy bit] or were directly involved in the  22 incident when weapons were discharged."  23 Yes?  24 <b>A. Yes.</b>  25 Q. I will read on, then come back to that:</p> <p style="text-align: center;">Page 191</p>
<p>1 Q. At 471 -- I am going to this document because this is  2 the one you were following, rather than the manual, yes?  3 <b>A. Yes.</b>  4 Q. I might take you to some of the manual later, but I just  5 want to start with what you were following.  6 Just dealing with the introduction, 1.1, the  7 following principles:  8 "Clear and robust policy for post-incident  9 procedures and related investigations, and to act as  10 guidance for those persons involved in such procedures  11 and investigations."  12 Yes?  13 <b>A. Yes.</b>  14 Q. Then, 1.2:  15 "Due regard has been given to the overriding  16 principles of the European Convention on Human Rights.  17 In particular, Article 2, Article 6 and Article 8."  18 Yes?  19 <b>A. Yes.</b>  20 Q. You, from you training, understand that would include  21 an investigative obligation on GMP where it has shot  22 dead a subject in an operation, wouldn't you?  23 <b>A. Yes.</b>  24 Q. That was a key part of what your role was, as  25 post-incident manager, you would understand that?</p> <p style="text-align: center;">Page 190</p>	<p>1 "However, principal officers could include other  2 persons, such as tactic the commanders, OCB staff and  3 tactical advisers, et cetera."  4 Coming to the facts of what we are all here to  5 consider, would you agree that within that definition of  6 principal officer, you obviously have Q9, yes? And you  7 obviously would have Z15?  8 <b>A. Yes.</b>  9 Q. Also fired shots. But, also, you would have all of the  10 other AFOs who were deployed on to that car?  11 <b>A. I think, potentially, yes.</b>  12 Q. Not potentially. How would you say, for example, the  13 driver of the alpha car, W4, was not directly involved?  14 <b>A. They were all directly involved. They were all present</b>  15 <b>at the scene, yes.</b>  16 Q. They were all directly involved, yes.  17 So you, as the post-incident manager, ought to have  18 identified certainly the AFOs in the three cars involved  19 in the initial strike, but probably the four cars, the  20 delta car as well, yes? As principal officers.  21 <b>A. On that interpretation, yes.</b>  22 Q. On that interpretation, yes. But I am simply asking you  23 about the policy. You are the expert here, aren't you?  24 Because you are the manager who is trained to do this,  25 you were there, so you tell us. It is not my</p> <p style="text-align: center;">Page 192</p>



1 interpretation, is it, it is what you are agreeing?  
 2 **A. I accept that all of those people --**  
 3 Q. Should have been considered?  
 4 **A. -- according to that paragraph, were principal officers.**  
 5 Q. Yes. If that is a right, then jumping to 5.12 -- and,  
 6 again, I will deal with this quickly. Not only watching  
 7 the clock, but also because you have already been  
 8 referred to this paragraph already.  
 9 It refers to initial accounts:  
 10 "Therefore, initial factual notes should be concise  
 11 and relevant to actions taken by the officer completing  
 12 the notes."  
 13 And so it goes on.  
 14 It is right, isn't it, that all of those officers  
 15 should have been required to complete initial factual  
 16 notes?  
 17 **A. According to that paragraph, yes.**  
 18 Q. Yes.  
 19 Is there some other paragraph that I am missing out  
 20 here? Help us. I mean, it is right, isn't it, that the  
 21 policy not only required you to treat all of the AFOs  
 22 involved in this incident as principal officers, but it  
 23 also required initial factual notes, or initial factual  
 24 accounts, as I think it is termed in the manual? From  
 25 all of them.

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1 **A. According to that, yes, sir.**  
 2 Q. According to that, but according to you, as the  
 3 post-incident manager, you would agree with that, yes?  
 4 **A. I would agree with that, yes.**  
 5 Q. Yes, so can you help us as to why it was that, as the  
 6 post-incident manager, you allowed these 16 AFOs to go  
 7 off duty at around about 6.00 am the following day, with  
 8 only three of them, I think, providing initial accounts?  
 9 **A. Because given the prevailing circumstance and the other**  
 10 **time constraints, I secured probably what I considered**  
 11 **to be the best evidence at the time that I could, and**  
 12 **the other accounts would be picked up as quickly as**  
 13 **possible thereafter.**  
 14 Q. I don't want to take up time with very obvious  
 15 questions, but it is quite clear, isn't it, that police  
 16 officers generally involved in any kind of significant  
 17 incident are required to make an initial note, generally  
 18 in a pocket notebook or on a statement form or on  
 19 a daybook or something of that nature, generally?  
 20 **A. It would be -- they would normally record what they had**  
 21 **done in the pocket notebook.**  
 22 Q. Yes, that would be a starting point. Taking it away  
 23 from this case, and any general situation, any  
 24 significant incident, yes?  
 25 **A. Yes.**

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1 Q. So why not here?  
 2 **A. I can only say what I did on the night, and the rights**  
 3 **and wrongs of that obviously have been heard here, but I**  
 4 **can't explain away or make excuses now. I can only tell**  
 5 **you what I did on the night and the best I could do on**  
 6 **the night.**  
 7 Q. So you would except, would you, that you ought to have  
 8 directed the officers to make initial factual notes on  
 9 the night?  
 10 **A. I think that the absolute, best way forward would have**  
 11 **been if all officers had given initial accounts on the**  
 12 **night. The way that it panned out, that that wasn't --**  
 13 **we weren't able to do that.**  
 14 Q. You were not able to do that, so let's just drill down  
 15 into that, if we may.  
 16 There was something like 11 hours between the  
 17 incident and the officers being allowed to go off duty,  
 18 yes?  
 19 **A. Yes.**  
 20 Q. It is a significant expanse of time, isn't it?  
 21 **A. Yes.**  
 22 Q. Yes. What we are talking about here is not full 20-page  
 23 statements of every detail. I am not going to read it  
 24 out, but you can see from the policy what was required;  
 25 significant detail running to perhaps a page of A4.

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1 So why, in 11 hours, was it not possible for these  
 2 officers to require their initial factual notes,  
 3 pointing out where they were stood, what they had heard,  
 4 what they saw and who did what?  
 5 **A. Because I think although the whole timeframe was**  
 6 **11 hours, the actual timeframe that the officers were**  
 7 **able to do that was significantly shorter.**  
 8 Q. Why?  
 9 **A. By time they got back to the post-incident management**  
 10 **suite, and by the time that we'd done the weapons**  
 11 **recovery, et cetera.**  
 12 Q. It was not something that had to be done serially, one  
 13 at a time, was it?  
 14 **A. It would be dependent on whether or not the officers**  
 15 **required welfare or Federation advice or legal advice**  
 16 **before they made any of those things.**  
 17 Q. I am not in any way suggesting they shouldn't have been  
 18 offered welfare, Federation, legal advice, all three.  
 19 I'm not for a moment suggesting they shouldn't but, over  
 20 11 hours, this was a process that might have taken them,  
 21 I don't know, 20 minutes, to do their notes.  
 22 **A. The available time was, as I have said, significantly**  
 23 **less than 11 hours.**  
 24 Q. I have made my point on that. Let me move it along  
 25 a bit.

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1 As I understand it from a note made by Mr Hughes --  
 2 and I can turn it up if we need to -- it is right,  
 3 I think, that the AFOS arrived at Claytonbrook at about  
 4 11.15. Does that accord with your recollection or  
 5 should I take you to the note?  
 6 **A. That would probably be about the right time, yes.**  
 7 Q. Were you aware, at the time, what they had been doing,  
 8 between -- whenever it was they had made their way back  
 9 from Culcheth, a 20 to 30 minute drive?  
 10 **A. I would presume there would be tasks to be completed**  
 11 **while they were still down at Culcheth; securing, the**  
 12 **scene and then making their way back.**  
 13 Q. Did you investigate that, exactly what they had been  
 14 doing? For example, to work out whether they had had  
 15 a meeting or conferred with each other? Did you ask?  
 16 **A. No, I didn't ask.**  
 17 Q. Why was that?  
 18 **A. I made the assumption that they had made their way back,**  
 19 **and they had been told about no conferring at the time.**  
 20 Q. When you did see them, when they came into the  
 21 post-incident procedure at Claytonbrook, you would agree  
 22 with me that you could have simply gone into a room with  
 23 them, explained what was happening and then said to  
 24 them: what I want you to do now, without conferring with  
 25 each other, is to make your factual notes. Or if you

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1 want to seek the welfare, the Fed, the lawyers, and then  
 2 make your initial factual notes.  
 3 **A. Hypothetically, yes.**  
 4 Q. Hypothetically. Why hypothetically?  
 5 **A. Because I didn't do that, and you are saying, "Could you**  
 6 **have?" So I can always answer a question of "could you**  
 7 **have?"**  
 8 Q. Okay, well, let me put it another way: is there some  
 9 reason why you didn't do that?  
 10 **A. I went in and I gave them a briefing about the**  
 11 **post-incident management procedure, where we were up to,**  
 12 **what the expectations of them would be, and that initial**  
 13 **accounts may need to be taken, it would possibly be**  
 14 **a long drawn out process of recovering weapons, and the**  
 15 **other advice that they would get.**  
 16 **But, at that time, I didn't tell them that they**  
 17 **would be required -- that I required initial accounts**  
 18 **off them immediately.**  
 19 Q. So we established from that that you had been through  
 20 various parts of the procedure, yes?  
 21 **A. Yes.**  
 22 Q. You have told them they may be required to give  
 23 an initial accounts. Why not simply say: you are  
 24 required to make initial accounts, as per the policy  
 25 that you say you were aware of and trained in?

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1 **A. I didn't say that, sir.**  
 2 Q. I understand what you have said, but why didn't you?  
 3 **A. I can't stand here now, 5 years later, and say what**  
 4 **exact thought process was going through my mind at that**  
 5 **time.**  
 6 Q. Let's move on. We know from your statement, and from  
 7 the evidence that you have given, that you seized the  
 8 DSU log, yes?  
 9 **A. Yes.**  
 10 Q. And that you seized the surveillance management log, and  
 11 I think the recording of the briefing, the morning  
 12 briefing, from 3 March?  
 13 **A. Yes, that's correct.**  
 14 Q. We know from your evidence that you didn't seize the  
 15 logs, the command logs, the silver, the gold command  
 16 logs, yes? In fact, you never seized them, did you?  
 17 **A. No, I didn't, no.**  
 18 Q. Given that you had in mind your responsibilities under  
 19 the post-incident management process, and being the  
 20 manager of it, and bearing in mind that you had the  
 21 presence of mind to think of these other documents and  
 22 recordings, why was it that you didn't seize the command  
 23 logs, the very logs that would or should have set out  
 24 contemporaneous events, decision-making rationales?  
 25 **A. I can't honestly say why I didn't do it. The only thing**

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1 **I can think of at this time, I was concentrating on the**  
 2 **other aspects of my role and I didn't seize those on the**  
 3 **night.**  
 4 Q. I am not for a moment saying the documents you did seize  
 5 were not important, they were, but these were the  
 6 central documents, weren't they, the command logs?  
 7 **A. Yes.**  
 8 Q. You never seized them?  
 9 **A. No, I didn't, no.**  
 10 Q. In fact, help me with this: I think you identified  
 11 Mr Sweeney and Mr Granby initially and Y19, the tactical  
 12 adviser -- let's not forget him -- you identified them  
 13 as principal officers, didn't you?  
 14 **A. Yes.**  
 15 Q. You didn't then require them to provide either their  
 16 documents or any initial accounts?  
 17 **A. No, I didn't.**  
 18 Q. Can you help us with that?  
 19 **A. I didn't ask them for those documents at the time.**  
 20 Q. Okay, but having identified them as principal officers,  
 21 it appears from the documents -- and I can take you to  
 22 them if you want -- but it appears then that you didn't  
 23 treat them as principal officers. Is that right or not?  
 24 **A. In line with getting the initial accounts off them, no,**  
 25 **I didn't.**

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<p>1 Q. Can you help us at all with that, beyond what you have 2 said already?</p> <p>3 <b>A. Not really, sir. I just concentrated as much as I could 4 on dealing with the operational officers who had been on 5 the ground.</b></p> <p>6 Q. Dealing with the OFC, X7, we know you received 7 an initial account off him. Did you investigate whether 8 he had any log, or whether there were any recordings of 9 his decisions that he made given the importance of his 10 role and these events?</p> <p>11 <b>A. At that time we just kept it to obtaining the initial 12 account?</b></p> <p>13 THE CHAIRMAN: Does anybody else have questions of this 14 witness, because he has been going now all afternoon. 15 It is well over an hour since his last break and I'm not 16 sitting late. If it is going to finish, it is going to 17 have to in the next five to ten minutes.</p> <p>18 MS WHYTE: I have at least five minutes worth but, unlike 19 some, I will not be asking questions that have already 20 been asked.</p> <p>21 THE CHAIRMAN: How much longer do you think you are going to 22 be, Mr Weatherby?</p> <p>23 MR WEATHERBY: Less than five minutes. I am not aware 24 I have been asking questions that have already been 25 asked.</p> <p style="text-align: center;">Page 201</p>	<p style="text-align: center;">I N D E X</p> <p>1 2</p> <p>3 MR DAVID TOTTON (sworn) .....1 4 Questions from MR BEER .....2 5 Questions from MR THOMAS .....62 6 Questions from MR WEATHERBY .....71 7 Questions from MR DAVIES .....75 8 Questions from MS WHYTE .....99 9 MR ANTHONY SIMPSON (sworn) .....112 10 Questions from MS CARTWRIGHT .....112 11 Questions from MR THOMAS .....180 12 Questions from MR WEATHERBY .....189 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 203</p>
<p>1 MR DAVIES: I was planning between three and five minutes. 2 THE CHAIRMAN: That is going -- 3 MS PALMER: Sorry, I was hoping for the same just -- 4 THE CHAIRMAN: Then I am going to stop. I'm not going to go 5 on. It is unfortunate this officer has to come back 6 tomorrow. But these are matters that have to be 7 pursued, so I am adjourning now. 8 Thank you. We will come back tomorrow. 9 <b>A. Thank you, sir.</b> 10 THE CHAIRMAN: 10.30. 11 (4.40 pm) 12 (The Inquiry adjourned until 10.30 am the following day) 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 202</p>	

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