

1 Wednesday, 22 February 2017
 2 (10.30 am)
 3 THE CHAIRMAN: Mr Thomas.
 4 MR THOMAS: Good morning, sir. Just to say that my client
 5 Marina is very unwell today and she's not here. I am
 6 just letting you know as a matter of courtesy.
 7 THE CHAIRMAN: Thank you very much.
 8 MR BEER: Thank you, sir.
 9 David Clark, please.
 10 THE CHAIRMAN: I think this witness may have an injury to
 11 his hand, the relevance of which is if he is asked to
 12 refer to a lot of files it might cause some difficulty.
 13 Just to make you aware of that, I hope I have the right
 14 person, is that right?
 15 MR BEER: Yes.
 16 THE CHAIRMAN: I am sure that Mrs Shaw will help whenever
 17 she can.
 18 MR DAVID CLARK (sworn)
 19 THE CHAIRMAN: Thank you, Mr Clark. Feel free to sit down
 20 if you would like to do so.
 21 **A. Okay.**
 22 **Questions from MR BEER**
 23 MR BEER: Mr Clark, my name is Jason Beer and I ask
 24 questions on behalf of the Inquiry, assisted by
 25 Ms Cartwright. In front of you there, there should be

Page 1

1 a bundle, we understand that you may have an injury to
 2 your hand or hands. If you need assistance at any time
 3 in particular pulling files out of the binders behind
 4 you there, somebody will help.
 5 **A. No problem.**
 6 Q. Just say and somebody will help.
 7 **A. All right.**
 8 Q. Opening up that binder, if you can, there should be at
 9 tab 1 a witness statement dated 13 March 2012 in your
 10 name. Is that right?
 11 **A. That's correct, yes.**
 12 Q. Then in tab 2, there should also be a witness statement
 13 dated 13 March 2012. Is that right?
 14 **A. That's correct, yes.**
 15 Q. Not the same witness statement?
 16 **A. No.**
 17 Q. They are different witness statements that start the
 18 same but deal with different observations?
 19 **A. That's correct, yes.**
 20 Q. In tab 3 there should be a witness statement dated
 21 18 April, but that is in relation to a different
 22 officer, Robert Dickinson.
 23 **A. It is, yes.**
 24 Q. Nothing to do with you --
 25 **A. Okay.**

Page 2

1 Q. -- so we will ignore that.
 2 **A. Okay.**
 3 Q. Tab 4, please, a witness statement dated 26 June 2012.
 4 In your name, yes?
 5 **A. That's correct, yes.**
 6 Q. In tab 5, I think it is originally dated 28 April 2012,
 7 but I think that has been crossed out and in its place
 8 has been written 19 July 2012?
 9 **A. Yes, that's correct.**
 10 Q. Is that in your name?
 11 **A. It is, yes.**
 12 Q. Thank you. In tab 6, please, a repeat copy of that
 13 witness statement dated 19 July 2012. Can you see that?
 14 **A. Yes, yes, I can.**
 15 Q. It is the same thing twice.
 16 **A. Yes.**
 17 Q. In tab 7, please, a witness statement dated
 18 30 September 2013.
 19 **A. That's correct, yes.**
 20 Q. In tab 8, please, a witness statement dated
 21 30 September 2013.
 22 **A. Yes, that's correct, that is a quite a poor copy though.**
 23 Q. It is quite a poor copy but I think the date is
 24 tolerably clear, 30 September 2013.
 25 **A. Yes, correct.**

Page 3

1 THE CHAIRMAN: That is not a duplication, is it?
 2 MR BEER: No.
 3 THE CHAIRMAN: Right, okay.
 4 MR BEER: Tab 9, please, I think that is 16 April 2014.
 5 **A. Yes, that's correct.**
 6 Q. A witness statement in your name. That refers to
 7 a report, can you see that?
 8 **A. That's correct, yes.**
 9 Q. It says:
 10 "On 18 July I authored a report, I produce this
 11 report."
 12 Just so we can see that, if you go to tab 12. Is
 13 that the report?
 14 **A. That's correct, yes.**
 15 Q. The 18 July report?
 16 **A. Yes.**
 17 Q. Then in tab 10 there is a duplicate of that witness
 18 statement?
 19 **A. That's correct, yes.**
 20 Q. Tab 11, lastly, your witness statement dated
 21 31 July 2014.
 22 **A. Yes, that's correct, yes.**
 23 Q. The nine witness statements that are yours, putting
 24 aside duplicates and Mr Dickinson's and the report which
 25 you wrote on 18 July 2012, are the contents of those

Page 4

1 true to the best of your knowledge and belief?
 2 **A. Yes, they are.**
 3 Q. Thank you.
 4 Can we start, please with some background. When did
 5 you join the police service?
 6 **A. I joined in June 1996.**
 7 Q. And I think from some of the documents I have read you
 8 worked on Salford division thereafter; is that right?
 9 **A. That's correct, for 10/11 years.**
 10 Q. That 10 or 11 years, that was between about 1996 and
 11 2006?
 12 **A. Roughly, yes.**
 13 Q. In that time, did you serve in uniform functions?
 14 **A. Yes, I did, yes.**
 15 Q. And plainclothes functions?
 16 **A. I did, yes.**
 17 Q. Amongst those did you spend time in the divisional
 18 Robbery Unit or robbery squad?
 19 **A. I did, yes.**
 20 Q. How long was that for?
 21 **A. The divisional robbery squad in particular, from**
 22 **about – it started off as a proactive unit then moved**
 23 **on to the Robbery Unit, so for about five years in**
 24 **total.**
 25 Q. When was that?

Page 5

1 **A. From about 2000 to about 2005, and then I moved on to**
 2 **what was developed as the organised crime unit, which**
 3 **dealt just with cash in transit. For my last 12 months**
 4 **or so.**
 5 Q. Did you move at some stage to what was known as the
 6 Force Robbery Unit?
 7 **A. I did, in September 2006 -- August/September 2006.**
 8 Q. Were you still serving in the Force Robbery Unit in
 9 January to March 2012?
 10 **A. That's correct, I was, yes.**
 11 Q. Did you become an officer attached to or investigating
 12 the operation known as Operation Shire?
 13 **A. I did, yes.**
 14 Q. What was your role in Operation Shire?
 15 **A. I was the disclosure officer, I did the telephone**
 16 **investigation. I carried out observations and obviously**
 17 **I managed the disclosure documents, including**
 18 **an intelligence document.**
 19 Q. The intelligence document, is that the intelligence
 20 chronology?
 21 **A. That is correct, yes.**
 22 Q. That sounds like four things; is that right?
 23 **A. Yes.**
 24 Q. The disclosure officer?
 25 **A. That's correct, yes.**

Page 6

1 Q. Responsibility for the telephones?
 2 **A. Yes, that's correct.**
 3 Q. Managing the intelligence chronology?
 4 **A. Yes, that is more or less a management function as**
 5 **putting the intelligence on it and making sure it was**
 6 **recorded, not disseminating it or having any decisions**
 7 **on what happened with it.**
 8 Q. Right, okay, we will come back in more detail to your
 9 function with the intelligence chronology in a moment.
 10 **A. Okay.**
 11 Q. Then lastly manning up observation posts?
 12 **A. That's correct, yes.**
 13 Q. Who managed you?
 14 **A. DS Hurst, Debbie Hurst was the sergeant, the Deputy SIO**
 15 **and DI Robert Cousen was the SIO.**
 16 Q. So if in civilian speak we asked who your line manager
 17 was, that would be DS Hurst. Is that right?
 18 **A. That's correct, yes.**
 19 Q. Who was in turn managed by DI Cousen?
 20 **A. That's correct. Yes.**
 21 Q. As a general high level question, what was your role in
 22 gathering intelligence?
 23 **A. During the operation, it was mainly observations. At**
 24 **the beginning of the operation I was asked to make**
 25 **an input when we identified David Totton.**

Page 7

1 Q. What was your role in rating the reliability of other
 2 intelligence that had been received?
 3 **A. In terms of?**
 4 Q. Any intelligence that came to the operation?
 5 **A. If it came in on logs, none at all.**
 6 Q. Is that because if it came in on logs, it had already
 7 been rated?
 8 **A. Yes, it is ready rated, yes.**
 9 Q. What was your role in collating and analysing
 10 intelligence?
 11 **A. Any that came in on the COPU logs, have we discussed**
 12 **what COPU logs are, everyone understands?**
 13 Q. Yes, the chairman knows what a COPU log is.
 14 **A. If that came in I would put it on to my intelligence**
 15 **chronology and then the decision what happened with it**
 16 **would be up the management chain.**
 17 **I would do some investigation on people named on it,**
 18 **obviously to keep the inquiry up to date -- the inquiry,**
 19 **the investigation up to date with people that were**
 20 **coming in on the logs but they were obviously known to**
 21 **the management because they were passing to them to me**
 22 **due to the nature of the rating on some of them.**
 23 Q. You have mentioned there information coming in on COPU
 24 logs?
 25 **A. That's correct, yes.**

Page 8

1 Q. Which is a sort of certain way by which some
 2 intelligence is communicated?
 3 **A. And recorded, yes.**
 4 Q. Yes.
 5 There is other intelligence that we have heard about
 6 from DI Cousen that is of a sensitive nature that
 7 doesn't get included on the intelligence chronology.
 8 **A. That wouldn't be in my range of knowledge.**
 9 Q. No, okay.
 10 **A. That is not something I could confirm or deny, if you**
 11 **like.**
 12 Q. Okay. We have also heard that some officers carried out
 13 effectively daily research across GMP's intelligence
 14 systems.
 15 **A. That's correct, what happens when we are running**
 16 **an operation, because we all -- it sounds a bit geeky,**
 17 **we have joined the Robbery Unit because we like**
 18 **investigating robberies so if we are running**
 19 **an operation, the suspects or the subjects will be**
 20 **researched in the morning on the GMP systems to see if**
 21 **they have not been locked up, sus circs or --**
 22 Q. Tell us what "sus circs" are?
 23 **A. Say there is a car in a certain area that has aroused**
 24 **the suspicions of the public, we will have a look at it**
 25 **and make sure it is not connected to our operation or**

Page 9

1 **one of our operational subjects.**
 2 Q. Did a particular member of the team have that
 3 responsibility for looking across the GMP systems in the
 4 morning?
 5 **A. I couldn't tell you that; most people in the office do**
 6 **it as a matter of course.**
 7 Q. Would each member of the team be doing it?
 8 **A. Yes, everyone does it because we are robbery geeks, if**
 9 **you like, or when we are investigating we make sure that**
 10 **we try and do as much as we can surrounding it.**
 11 Q. And so you would each be almost doing the same thing?
 12 **A. Yes, duplicated at times, yes.**
 13 Q. Or triplicating, if that is a -- quadruplicating --
 14 **A. That is a word --**
 15 Q. -- depending on how many of you there were?
 16 **A. Yes.**
 17 Q. Where did the fruits of this research get recorded?
 18 That was not on the intelligence chronology, was it?
 19 **A. If there was something relevant, I can only presume that**
 20 **nothing particularly relevant during the period came up**
 21 **but if anything came up, it would be recorded.**
 22 Q. On what?
 23 **A. On the intelligence chronology.**
 24 Q. Okay, so the fruits of the daily research, if anyone
 25 spotted that, that would go on to the intelligence

Page 10

1 chronology?
 2 **A. They'd make their line managers aware.**
 3 Q. Okay, so the intelligence chronology, that was the
 4 repository, the place, in which all intelligence, other
 5 than the things which you don't know about that
 6 DI Cousen knew about, got stored?
 7 **A. Yes.**
 8 Q. You were responsible for that document, the intelligence
 9 chronology, in terms of you had ownership of it?
 10 **A. Yes, if people brought stuff to me, but --**
 11 Q. Do you remember people bringing stuff to you, ie other
 12 members of the team when they were geekily going through
 13 the GMP systems in the morning?
 14 **A. No. No.**
 15 Q. Was that for the duration of Operation Shire until -- we
 16 are only concerned really up until 3 March?
 17 **A. Yes, that's correct.**
 18 Q. Is it right that all of the members of the team looking
 19 across GMP's intelligence systems for the five months or
 20 so that the operation ran, there was no relevant
 21 intelligence added to the chronology?
 22 **A. Not to the direct operation we were running, no.**
 23 Q. Turning specifically to the intelligence chronology,
 24 when did you open the document?
 25 **A. I'm sorry, I can't remember.**

Page 11

1 Q. You cannot remember?
 2 Is it a normal thing to be done in an operation of
 3 this kind, that there is a document called
 4 an "intelligence chronology", with a sort of capital I
 5 and a capital C?
 6 **A. If I am doing the disclosure, I like it that way so**
 7 **I can disclose it at the end but yes, the reason being**
 8 **is it really hard to get access to some of the**
 9 **information that was on there out of hours, so we had it**
 10 **locked, password locked, so if we needed to go to**
 11 **an cadre or someone at short notice it was in a set**
 12 **place that we could get to. That was the main reason.**
 13 Q. Where was it kept?
 14 **A. It was on the hard drive, the joint hard drive.**
 15 Q. The S: drive?
 16 **A. The S: drive, yes.**
 17 Q. Okay. Who had access to it?
 18 **A. I had access to it, the boss, Mr Cousen, and Debbie as**
 19 **far as I know, I couldn't tell you who else, I know they**
 20 **definitely did.**
 21 Q. Okay. Why was it protected in that way?
 22 **A. Because of the ratings of some of the intelligence on**
 23 **it.**
 24 Q. What did having responsibility or ownership for the
 25 intelligence chronology entail?

Page 12

1 **A. Basically populating it was the main function.**
 2 Q. COPU logs, how would you receive those?
 3 **A. I don't recall how I got them but quite a lot of them**
 4 **have put -- I have put on word for word, so at some form**
 5 **or other I have seen the electronic version because**
 6 **I have cut and pasted some of them in -- for example,**
 7 **you know the capital letters, where they are all written**
 8 **in capital letters, which I wouldn't write in capital**
 9 **letters because it sounds like you are shouting.**
 10 Q. You would receive by a means, electronically, COPU logs
 11 and you would place them, the entry, the date, and the
 12 rating --
 13 **A. Yes.**
 14 Q. -- word for word on to the intelligence chronology?
 15 **A. Yes, that's correct.**
 16 Q. If we can just look at that, please. I think it is
 17 volume S. So it is not in your file there but somebody
 18 will dig it out for you.
 19 **A. Thank you.**
 20 **Sir, do you mind if I just place that up there**
 21 **while --**
 22 THE CHAIRMAN: Not at all.
 23 **A. Thank you.**
 24 MR BEER: Do you have bundle S there?
 25 **A. I have, yes.**

Page 13

1 Q. We have split the intelligence chronology into
 2 effectively two documents. One is the document that you
 3 originally created, which is from pages 4 to 13, can you
 4 see that?
 5 **A. Yes.**
 6 Q. Now, a lot of it is redacted. But you will see some
 7 entries that are not redacted on pages 5, 8, 9, 10, 11.
 8 **A. Yes.**
 9 Q. You would, is this right, cut from the COPU log entries
 10 like this into the document?
 11 **A. Yes, on occasion. And DS Hurst occasionally did it as**
 12 **well and would inform me that it had gone on, so I was**
 13 **up to date on where we were.**
 14 Q. You shared responsibility with DS Hurst for this?
 15 **A. It was my responsibility but if she put it on, she would**
 16 **inform me to let me know. She has put it on so yes is**
 17 **the answer, sorry -- I will dance around less.**
 18 Q. Underneath the black redactions are other entries that
 19 do not directly relate to the subjects with which we are
 20 concerned, which is one reason why they have been
 21 redacted, yes?
 22 **A. I will have to take your word for that because obviously**
 23 **I can't remember the document word for word, so**
 24 **I presume that is why that has been done, yes.**
 25 Q. They have been gisted and you can see a gist of what

Page 14

1 they say between pages 14 and 16.
 2 **A. Yes.**
 3 Q. Okay?
 4 **A. Hmm.**
 5 Q. These would come in pre-rated; is that right?
 6 **A. That's correct, yes.**
 7 Q. You wouldn't change the rating yourself?
 8 **A. No, I can't do that, I haven't got that function.**
 9 Q. What, if anything, would you do in order to develop the
 10 intelligence that you received on the intelligence
 11 chronology? First of all, was it your job to do so?
 12 **A. No.**
 13 Q. Whose job was it to do so?
 14 **A. I couldn't answer that. They would be passed on the**
 15 **boss who directs the investigation, where we are going**
 16 **with the intelligence. That is all I can answer to that**
 17 **question.**
 18 Q. How many people were in the robbery squad attached to
 19 Operation Shire?
 20 **A. It was a very small team. People would jump in and out**
 21 **of observations from the bigger team on occasion,**
 22 **because you just can't physically staff it.**
 23 Q. Man all the posts?
 24 **A. Yes.**
 25 **But there was: DI Cousen; DS Hurst; myself;**

Page 15

1 **Andy Talbot, DS Talbot; DC Mills, Gary Mills and that**
 2 **was I think the core.**
 3 Q. That was the core, so five of you?
 4 **A. Yes.**
 5 Q. If the intelligence was received on the intelligence
 6 chronology and DI Cousen was made aware of it and it was
 7 his job, I think you said, to decide whether it needed
 8 to be developed or researched, and if so who was to do
 9 it, you all I think sat in close proximity to each
 10 other --
 11 **A. We did, yes.**
 12 Q. -- didn't you, in a little hub effectively, a group of
 13 tables?
 14 **A. A group of tables, yes.**
 15 Q. Wouldn't you know whose job it was to develop any of the
 16 intelligence because you were in a small team in a small
 17 room sitting around a small number of desks?
 18 **A. Yes, like I said, we discussed the intelligence -- we**
 19 **discussed the intelligence in most mornings and what was**
 20 **going on with the investigation, but actually whose**
 21 **specific role it was to develop or anything, if it sent**
 22 **out on an action or anything on the --**
 23 Q. CLIO?
 24 **A. The CLIO system, the CLIO system, again, we wouldn't be**
 25 **seeing that, or I certainly wouldn't see it till the end**

Page 16

1 **when I did the disclosure for it. So if it was sent out**
 2 **on the email, electronic system on CLIO, no is the**
 3 **answer to that, but most of us were aware of the**
 4 **intelligence surrounding -- I say most, all of us would**
 5 **be.**
 6 Q. The options as to who might develop it are limited
 7 really between five of you, is that right? DI Cousen,
 8 DS Hurst and then the three DCs?
 9 **A. Yes, correct, if there was not practicable because five**
 10 **people cannot do everything, it might go somewhere else**
 11 **on occasion but the five core team, if you like, were**
 12 **the people I have named.**
 13 Q. Take for example if you look at page 11 there, item 41
 14 on the intelligence chronology, can you see that?
 15 **A. Yes, I can.**
 16 Q. The COPU reference number and the rating, or ratings --
 17 **A. Yes.**
 18 Q. -- have been redacted from that but otherwise, as
 19 I understand it, this is how it appeared originally in
 20 the intelligence chronology?
 21 **A. That's correct, yes.**
 22 Q. "A team of individuals which is headed by David Totton
 23 are actively involved in the commission of armed robbery
 24 offences at banks, building societies and other premises
 25 where large sums of cash are kept."

Page 17

1 That first line didn't really tell you anything new
 2 that required to be researched, I think that is fair
 3 isn't it?
 4 **A. That's fair, yes. After the events of the 29th, the**
 5 **Stoke trips.**
 6 Q. Yes, that was effectively the subject matter of the
 7 investigation by then?
 8 **A. That's correct.**
 9 Q. But then it says:
 10 "David Totton is planning to commit offences of
 11 robbery with his close friend Idgy and others including
 12 Anthony Grainger and twin brothers known as Aaron and
 13 Bradley."
 14 **A. That's correct.**
 15 Q. Reading that, you might, or one might say, right,
 16 action: identify who Idgy is.
 17 **A. Yes, I knew who Idgy was so.**
 18 Q. Sorry?
 19 **A. I know who Idgy is.**
 20 Q. Iain Parkinson, presumably?
 21 **A. Iain Colin Parkinson, yes.**
 22 Q. Sorry?
 23 **A. Iain Parkinson, yes.**
 24 Q. Next action, raise a subject profile, if we haven't got
 25 one on Parkinson?

Page 18

1 **A. Again, that is not a question for me to answer.**
 2 Q. Third action might be, I don't know, "Task people to
 3 identify other information about Iain Parkinson".
 4 **A. Again, it is not a question for me to answer that. That**
 5 **would not be my decision, I am not the SIO and I am not**
 6 **the Deputy SIO.**
 7 Q. I am not suggesting that these would be, I am saying
 8 that these are the type of things that one might imagine
 9 to be raised when a piece of intelligence like this is
 10 received?
 11 **A. Again, sorry but ... I am not imagining -- it is not me**
 12 **that would have done that.**
 13 Q. But you were in a small team --
 14 **A. Yes.**
 15 Q. -- sitting in proximity to a limited number of other
 16 people, whose job it would be if such actions were
 17 raised to get on and do them, yes?
 18 **A. No, well raising profiles and staff would be tasked out**
 19 **to the FIB. We knew, well, we knew who the people**
 20 **were -- so, again, it is not a question that I can**
 21 **answer, sorry, of what happened with it.**
 22 Q. That is what I want to get at really, my overall
 23 question is going to be, "In the month before
 24 Mr Grainger was shot, what was done with this
 25 intelligence?"

Page 19

1 **A. What was done with the intelligence?**
 2 Q. Yes, in the month before, between 2 February and
 3 3 March, ie a month, what was done with the
 4 intelligence?
 5 **A. Well the intelligence was confirmed that**
 6 **Anthony Grainger was working with David Totton through**
 7 **observations.**
 8 Q. No, I am asking what was done with the intelligence
 9 here.
 10 **A. It was confirmed via observations with Anthony Grainger.**
 11 Q. Right.
 12 **A. Idgy Parker -- Parkinson, didn't come into it. There**
 13 **was some phone contact with Iain Parkinson, because**
 14 **I was doing the phones, and the McLennans were in**
 15 **prison. They were being let out on day release.**
 16 Q. You have told us the facts there, as you understand them
 17 to be.
 18 **A. Yes.**
 19 Q. One action might be: identify who are Aaron and Bradley.
 20 **A. Yes, I know who Aaron and Bradley were as well.**
 21 Q. Sorry?
 22 **A. I know who Aaron and Bradley was as well from my time in**
 23 **Salford and obviously I have provided that information**
 24 **in the briefing that I give to Mr Ellison as well, which**
 25 **we will move on to.**

Page 20

<p>1 Q. Yes. You reading this, you would just say, "I know 2 that, that is definitely Aaron and Bradley McLennan"?</p> <p>3 A. Yes, and again that would be discussed in the group. 4 What happens with it from there is, sorry, the point 5 I am trying to make, it would not be my decision where 6 it moved on. If we are having a discussion, we know who 7 the people involved are.</p> <p>8 Q. Presumably you knew they were in prison at this time?</p> <p>9 A. Yes.</p> <p>10 Q. Presumably there was a discussion: 11 "Hold on, this information we are getting that they 12 are planning a robbery with two people that are in 13 prison might not be that reliable."</p> <p>14 A. Again, yes, I will agree with that, yes.</p> <p>15 Q. That discussion would be had, wouldn't it?</p> <p>16 A. Yes. Later on down the line, I know we will move on to 17 that, it is clear that they have been out on day release 18 because there are photographs of the McLennans at boxing 19 events when they are in fact in prison in David Totton's 20 phone, and Robert Rimmer's phone.</p> <p>21 Q. What I am driving at or trying to understand is when 22 intelligence like this was received, was there 23 a structured process by which it was broken down, lines 24 of enquiry were identified and then the results of those 25 lines of enquiry were fed back to the team and</p> <p style="text-align: center;">Page 21</p>	<p>1 apologise.</p> <p>2 Q. Okay. I have looked at your emails after 2 March in 3 relation to Operation Shire and cannot see any reference 4 in the emails to any research being undertaken in 5 relation to this intelligence by you. Would that be 6 right?</p> <p>7 A. That's right, yes.</p> <p>8 Q. I have looked in your casebook and cannot see any 9 reference to you researching or developing this 10 intelligence in the month after 2 February. Would that 11 be right?</p> <p>12 A. Yes. That would be correct. There is in my telephones 13 investigation to do with Parkinson.</p> <p>14 Q. Shall we look at that then?</p> <p>15 A. Yes.</p> <p>16 Could I have a copy myself casebook with me, please?</p> <p>17 Q. Sure, it is in a red folder. 18 I think that is the same for you, sir, a separate 19 red --</p> <p>20 THE CHAIRMAN: I have it here, I think.</p> <p>21 MR BEER: Thank you very much. 22 We are looking at your casebook and it starts on 23 20 October 2011 and --</p> <p>24 A. It is quite heavily redacted, isn't it?</p> <p>25 Q. Yes.</p> <p style="text-align: center;">Page 23</p>
<p>1 discussed?</p> <p>2 A. Yes, that is a standard police investigation, yes, it 3 would have been. Sorry, what I was trying to say is 4 what happens with it is not a question I can answer, or 5 who did it, I do apologise.</p> <p>6 Q. No, that is all right. 7 For example, Aaron and Bradley, was, to your 8 knowledge, an action raised identify or confirm that 9 that is the McLennan brothers, find out, raise a profile 10 in relation to each of those, find out what is happening 11 to them?</p> <p>12 A. I couldn't tell you, sorry.</p> <p>13 Q. Similarly, the last line: 14 "David Totton is also heavily involved in the large 15 scale movement of cocaine with a criminal associate 16 known as Rimmer." 17 I think by this time Robert Rimmer had already 18 entered the consciousness of the investigation team; is 19 that right.</p> <p>20 A. Yes, that's right, yes.</p> <p>21 Q. You would know who he was?</p> <p>22 A. I know him, yes.</p> <p>23 Q. Again, to your knowledge, were actions raised concerning 24 that last line?</p> <p>25 A. Again, it would be a question for someone else, I do</p> <p style="text-align: center;">Page 22</p>	<p>1 If it would help you to have an unredacted version, 2 I mean I think phone numbers have been redacted, in 3 part, and the names of people who don't have 4 a connection to the operation, by GMP.</p> <p>5 A. Idge is on page 45, on research of doing on 8 March.</p> <p>6 Q. That is five days after Mr Grainger died, yes?</p> <p>7 A. Yes. It is when we have recovered the phones from 8 handsets.</p> <p>9 Q. Looking at page 45, then, which --</p> <p>10 A. Sorry?</p> <p>11 Q. Eight lines from the bottom "Idge"?</p> <p>12 A. Yes, there is a telephone number and something written 13 underneath and then a symbol saying both refer to 14 Parkinson.</p> <p>15 Q. This is the physical handsets that have been 16 recovered --</p> <p>17 A. That's correct, yes.</p> <p>18 Q. -- after the event?</p> <p>19 A. Yes.</p> <p>20 Q. It says "Floater" as the heading, was that a telephone 21 that you couldn't attribute to either Mr Totton, 22 Mr Grainger or Mr Rimmer?</p> <p>23 A. Again, I don't know what "floater" refers to, I can't 24 remember, I do apologise.</p> <p>25 Q. You have, what, looked on there and have seen there</p> <p style="text-align: center;">Page 24</p>

1 a number for Idge, ie Mr Parkinson?
 2 **A. That's correct, yes.**
 3 Q. I was more interested in research done before
 4 Mr Grainger had been -- before he died, before the
 5 arrests were made.
 6 **A. Like I said before, I didn't do any -- during that**
 7 **period I didn't do any but I certainly identified**
 8 **Mr Parkinson as, during the telephone investigation.**
 9 Q. I am interested in what happened with the intelligence
 10 chronology, and in particular item 41 of it --
 11 **A. Yes.**
 12 Q. -- after it was received --
 13 **A. Sorry, I do apologise, I have tried to answer that**
 14 **question. It is not something that I can help you with,**
 15 **unfortunately. Where and what actions were created.**
 16 Q. I have also looked at the CLIO management system and,
 17 I mean I may be mistaken because of the way it is set
 18 out -- it's not that easy to read -- but I couldn't see
 19 any particular reference to researching or developing
 20 this intelligence after 2 February?
 21 **A. Again, it is not something I can answer, sorry.**
 22 Q. Can you recall now whether any store was placed by the
 23 intelligence of 2 February or whether it was just put to
 24 one side as more of the same that we had already
 25 received, and that might explain why it was not

Page 25

1 researched and developed?
 2 **A. Again, it is -- what is the actual question there,**
 3 **sorry? What is the store?**
 4 Q. Can you recall whether the intelligence of 2 February
 5 was discussed in the team and a decision was taken not
 6 to research and develop any lines in it?
 7 **A. I don't remember about what the dissemination would be**
 8 **or the lines, but it was discussed.**
 9 Q. What was the discussion?
 10 **A. Again, just what it was. The people named and who they**
 11 **were.**
 12 Q. Okay.
 13 **A. I can't help you with what happens after that and the**
 14 **CLIO system, et cetera. I am sorry.**
 15 Q. I will move on.
 16 **A. Thank you.**
 17 Q. Can we go back to the briefing that you gave to
 18 Superintendent Stuart Ellison on 25 January 2012.
 19 **A. Certainly. Back to the original bundle?**
 20 Q. I am not going to go to any documents at the moment. In
 21 general terms, is this right, you were asked to come
 22 into the briefing without any notice?
 23 **A. That's correct, yes.**
 24 Q. You therefore hadn't prepared a document beforehand
 25 setting out what you intended to say?

Page 26

1 **A. No.**
 2 Q. That included you didn't make any notes of what you
 3 intended to say?
 4 **A. That's correct.**
 5 Q. You didn't make a note, having been into the briefing,
 6 of what you had said?
 7 **A. No.**
 8 Q. We are talking about now a briefing on 25 January 2012,
 9 so about five years ago?
 10 **A. That's correct, yes.**
 11 Q. In that briefing, you were speaking about events that
 12 had occurred -- if my calculations are correct --
 13 between two years before then, Operation Adequate which
 14 was in 2010?
 15 **A. Yes, that's right, I was the case officer on that.**
 16 Q. And 16 years before then, Operation Vulture?
 17 **A. That's correct, yes.**
 18 Q. We have heard some evidence already that some of the
 19 information that you gave was not recorded on
 20 intelligence logs. Did you make that clear to the
 21 investigation team that you were briefing, that this was
 22 all done just from recollection --
 23 **A. Yes.**
 24 Q. -- and without the opportunity to refresh your memory in
 25 relation to events that had occurred up to 16 years

Page 27

1 previously?
 2 **A. Yes, that's correct.**
 3 Q. And so what, you gave a warning, did you, "Look I am
 4 just going off memory here, some of this might be
 5 wrong"?
 6 **A. No, I never said some of it might be wrong. I wouldn't**
 7 **ever try and present wrong information.**
 8 Q. I know you wouldn't try and present it, wrong
 9 information.
 10 **A. No. The dates, I said, might be a bit left and -- not**
 11 **left and right, a bit out but the information I was**
 12 **giving, to the best of my knowledge.**
 13 Q. You said that the dates might be a bit out but the
 14 substance of the information --
 15 **A. The substance, I would never go in and say some of this**
 16 **intelligence might be wrong, because why would I?**
 17 Q. Would it have been apparent, do you think, to those in
 18 the room that your recollection might not have been
 19 reliable and that therefore they should check the
 20 details of what you were saying?
 21 **A. That wouldn't be a question I could answer. He was**
 22 **making notes and I gave -- and ultimately I don't have**
 23 **that power, I am a DC speaking to a superintendent,**
 24 **I will present the information I have been asked to be**
 25 **brought in and speak about, but he records it and it is**

Page 28

<p>1 his decision. That is quite a bit above my pay grade.</p> <p>2 Thank you.</p> <p>3 Q. But you can say to a superintendent:</p> <p>4 "Hold on, this comes with a health warning, I was</p> <p>5 doing something else a moment ago, I have been hoicked</p> <p>6 into a room and asked about things that happened up to</p> <p>7 16 years ago, I've got no notes, I have not looked at</p> <p>8 the system for years, just be careful with what I am</p> <p>9 telling you."</p> <p>10 A. The dates, I was quite happy with the substance of what</p> <p>11 I was saying and, like I said, we are in the Robbery</p> <p>12 Unit, we have applied to go into the Robbery Unit</p> <p>13 because we like the investigation of robberies. It is</p> <p>14 not a divisional thing, and the consequence of just</p> <p>15 putting people in prison takes away most of their adult</p> <p>16 life so there is a lot of burden on what you are telling</p> <p>17 people so you have to be confident in what you are</p> <p>18 saying.</p> <p>19 Likewise you have to be confident if someone says go</p> <p>20 into a room and speak to people -- no chance if you are</p> <p>21 not happy with your subject matter.</p> <p>22 Q. Health warning over the dates but not over the</p> <p>23 substance. Would that be a fair way of summarising it?</p> <p>24 A. Yes, I definitely didn't go in and say, as you said</p> <p>25 originally, "Some of this might be wrong".</p> <p style="text-align: center;">Page 29</p>	<p>1 Q. Superintendent Ellison was making notes, wasn't he?</p> <p>2 A. He was, yes.</p> <p>3 Q. Was he writing it down as you were saying it,</p> <p>4 effectively?</p> <p>5 A. I couldn't recall. He was pausing at certain times to</p> <p>6 write, but I don't think he was doing it verbatim. I do</p> <p>7 talk at times very fast and he was telling me to slow</p> <p>8 down and I was telling him a lot of information and he</p> <p>9 was stopping and recording as much as he could, yes.</p> <p>10 Q. Was he being a bit fussy over it?</p> <p>11 A. At times, yes.</p> <p>12 Q. And being careful, or he gave the appearance of being</p> <p>13 careful of the task he was undertaking?</p> <p>14 A. He certainly was attentive. I couldn't say what he was</p> <p>15 writing or the accuracy of his notes because they are</p> <p>16 not my notes, but he was certainly attentive to what</p> <p>17 I was saying.</p> <p>18 Q. When was the first time that you made a written account</p> <p>19 of what you said in the briefing?</p> <p>20 A. It would have been when I was requested to make the</p> <p>21 report that we referred to earlier.</p> <p>22 Q. So the report that we referred to earlier is your first</p> <p>23 written account?</p> <p>24 A. Yes, in July, yes.</p> <p>25 Q. If we look at that, please, it is tab 12, please.</p> <p style="text-align: center;">Page 31</p>
<p>1 Q. After you had gone into the room and given the</p> <p>2 briefing --</p> <p>3 A. Yes.</p> <p>4 Q. -- did you take any steps to verify what you had said,</p> <p>5 ie by going back and checking your recollection against</p> <p>6 the system?</p> <p>7 A. Checked against the dates, yes.</p> <p>8 Q. Did you?</p> <p>9 A. Yes.</p> <p>10 Q. What did you check on?</p> <p>11 A. Again, I can't remember, it was either GMPics or OPUS</p> <p>12 and I don't know when that actually was but certainly</p> <p>13 between then and now I have checked.</p> <p>14 Q. I meant more immediately afterwards rather than in the</p> <p>15 last five years --</p> <p>16 A. I don't recall that.</p> <p>17 Q. -- so having walked out of the room, thought I have just</p> <p>18 briefed up a firearms commander here, I just better</p> <p>19 check the accuracy of what I have told you?</p> <p>20 A. I can't remember that, when exactly I have checked the</p> <p>21 information. A lot of the information I give is held on</p> <p>22 our S: drive, the Robbery Unit S: drive as well, from</p> <p>23 MG5s and personal experience, so ...</p> <p>24 Q. Now Superintendent Clark was making --</p> <p>25 A. Ellison.</p> <p style="text-align: center;">Page 30</p>	<p>1 A. Sorry, that is my bad.</p> <p>2 Q. This was made I think six months later on 18 July 2012.</p> <p>3 A. That's correct, yes.</p> <p>4 Q. Why were you writing this report?</p> <p>5 A. It was a request from the Operation Idris team, just to</p> <p>6 give them an idea of the sequence of events I think, as</p> <p>7 far as I know.</p> <p>8 Q. What was the Operation Idris team?</p> <p>9 A. The GMP investigation.</p> <p>10 Q. Investigation of what?</p> <p>11 A. The events of 3 March 2012.</p> <p>12 Q. Do you know for what purpose that they were</p> <p>13 investigating the events of 3 March?</p> <p>14 A. Because of the fatal shooting, yes.</p> <p>15 Q. Was this in the context of an investigation of GMP's</p> <p>16 conduct?</p> <p>17 A. I don't know. Well, it will be, yes. It ultimately is,</p> <p>18 isn't it, yes.</p> <p>19 Q. Who was the report written to? Who were you writing it</p> <p>20 to?</p> <p>21 A. It was to the -- it was forwarded to DI Foulkes, who was</p> <p>22 a DS at the time.</p> <p>23 You say, with reference to the intelligence briefing</p> <p>24 on 25 January 2012, I will report as follows:</p> <p>25 "On 25 January 2012 I was on duty at Nexus House</p> <p style="text-align: center;">Page 32</p>

<p>1 when I was requested to attend a meeting that was taking 2 place between temporary DI Cousen and 3 Superintendent Ellison in relation to a firearms 4 authority for Operation Shire. On attendance at the 5 meeting I outlined the criminal history of David Totton 6 from knowledge of working on the Salford division for 7 over ten years and my past six years' experience in the 8 FRU."</p> <p>9 Then you say: 10 "During the conversation I mentioned my knowledge of 11 two particular crimes in relation to firearms that 12 Totton had been mentioned as having involvement with." 13 Yes?</p> <p>14 A. That's correct, yes.</p> <p>15 Q. Then you say: 16 "The first ..." 17 On my copy I have effectively drawn a line above 18 that, "The first", right down to the paragraph that says 19 "Tansey and Totton were charged, however never 20 convicted". 21 Yes?</p> <p>22 A. That's correct, yes.</p> <p>23 Q. That is all about the first, is it? 24 A. Yes.</p> <p>25 Q. Then the second is:</p> <p style="text-align: center;">Page 33</p>	<p>1 A. Sorry, what is the -- are you saying that I didn't 2 mention it in the briefing?</p> <p>3 Q. I am not saying one thing or another. 4 A. I did mention it in the briefing.</p> <p>5 Q. You did mention it? 6 A. Yes.</p> <p>7 Q. Okay. 8 In the briefing you mention two crimes, 1999 car 9 pursuit -- 10 A. Yes.</p> <p>11 Q. -- Bolton 2000, you mention two operations, 2001 and 12 then Operation Ascot, which I think we know is 2005. 13 A. Yes.</p> <p>14 Q. Okay. 15 A. In this report, yes.</p> <p>16 Q. In this report. 17 A. Yes.</p> <p>18 Q. Is it right that you did not consult any records when 19 you made this report? 20 A. That's correct, yes.</p> <p>21 Q. On the face of it, none are mentioned in the document, 22 are they? 23 A. No. No.</p> <p>24 Q. Would you agree, looking at it, it is quite short -- 25 A. It is quite short and bland, yes.</p> <p style="text-align: center;">Page 35</p>
<p>1 "Another offence I mentioned was a robbery that 2 occurred in 2000 in Bolton." 3 Yes?</p> <p>4 A. That's correct.</p> <p>5 Q. I have drawn another line after the three paragraphs on, 6 which ends, "Ie actually entering the banks to commit 7 the robbery", is that right? That is the second thing 8 you mentioned? 9 A. Yes.</p> <p>10 Q. Then you in fact go on to say, "I also mentioned 11 an operation from 2001", so although your opening 12 paragraph says, "I mentioned my knowledge of two 13 particular crimes", in fact you go on to say -- 14 A. Two crimes, yes.</p> <p>15 Q. "I also mentioned a third", yes? Yes? 16 A. Operation, I also mentioned an operation, which is where 17 we differ. It's the operation into stuff we have done 18 in the Force Robbery Unit, that is actually from 19 knowledge of crime.</p> <p>20 Q. Right. Then over the page, you mention a different 21 operation, Operation Ascot, yes? 22 A. That's correct, yes.</p> <p>23 Q. You don't say there whether you mention that or not? 24 A. Say again?</p> <p>25 Q. You don't say there whether you mentioned it or not?</p> <p style="text-align: center;">Page 34</p>	<p>1 Q. That no records had obviously been referred to by tell 2 tale signs, for example crime reference numbers -- 3 A. No, nothing.</p> <p>4 Q. -- or specific dates? 5 A. Yes.</p> <p>6 Q. The closest we get is the years? 7 A. Yes.</p> <p>8 Q. Would it be fair to say that this is your first written 9 account and is likely to be your best recollection of 10 what you said six months previously? 11 A. It is to the extent of what I mention, but the back up 12 intelligence that I used to justify some of them wasn't 13 there.</p> <p>14 Q. Is that because it was not mentioned? 15 A. It wasn't mentioned where, in this report?</p> <p>16 Q. In the briefing. 17 A. No, it was mentioned in the briefing.</p> <p>18 Q. Okay. You had been asked to I think set out your 19 knowledge, your recollection, of what you had said? 20 A. Yes.</p> <p>21 Q. Are you saying that this report only sets out some of 22 what you had said in the 25 January briefing? 23 A. In relation to the crimes, yes. Do want me to elaborate 24 on that now or are you going to move on to these 25 statements?</p> <p style="text-align: center;">Page 36</p>

1 Q. We will come to your fuller witness statement in
 2 a moment --
 3 **A. No problem.**
 4 Q. -- but why, if you were providing a report on what you
 5 had briefed on 25 January, is it only a partial account
 6 of what you had briefed on?
 7 **A. It was -- I was asked to make a report to say what my**
 8 **involvement in that briefing was at the time, a short**
 9 **report. So that is what I have --**
 10 Q. Did they ask you only to produce a short report?
 11 **A. Well, it was acceptable, I sent it off.**
 12 Q. Did they ask you to produce a short report?
 13 **A. I can't remember that wording, sorry.**
 14 Q. Why would you only include part of what you had briefed
 15 on 25 January?
 16 **A. Like I said, it is just the report I initially put in to**
 17 **help them out with my role in that briefing.**
 18 Q. Why would you only put in part of what you had briefed
 19 on 25 January?
 20 **A. I don't know, sir, but there is more behind that.**
 21 Q. Can we compare that to tab 5 in the bundle, please.
 22 **A. Certainly.**
 23 Q. This is a witness statement dated 19 July 2012.
 24 **A. That's correct.**
 25 Q. Why were you making a witness statement the next day?

Page 37

1 **A. I have no idea why -- what caused it to be produced the**
 2 **next day. Is it the next day?**
 3 Q. The 18 July --
 4 **A. It is the 12th on my copy. The 19th, sorry, what**
 5 **divider are we on, sorry?**
 6 Q. 5.
 7 **A. That is why, sorry.**
 8 Q. If you want to look at tab 6, there is a --
 9 **A. Yes, typed cleaner version.**
 10 Q. -- cleaner version there where it is actually printed,
 11 19 January. You have made the reports on --
 12 **A. Again, I can't answer that but I presume it is to make**
 13 **a fuller statement, a more detailed account.**
 14 Q. Why does the witness statement not replicate the report
 15 made the previous day?
 16 **A. Because I have filled out on what I was saying, it was**
 17 **a chronology, when I was in the briefing.**
 18 Q. Sorry, you had filled out on what you had said, is that
 19 right, in the witness statement made the next day?
 20 **A. The briefing, the statements about the briefing and the**
 21 **full stuff mentioned in the briefing.**
 22 Q. Looking at it generally, the main difference, would you
 23 agree, is the significant addition of detail into your
 24 account as to what you had said?
 25 **A. That's correct, yes.**

Page 38

1 Q. By this time, the next day, you had dug out a series of
 2 crime reports in relation to the operations and the
 3 crimes that you had spoken to Superintendent Ellison
 4 about, hadn't you?
 5 **A. That is while I was making the statement, I dug them**
 6 **out.**
 7 Q. Sorry?
 8 **A. While I was making the statement I dug them out,**
 9 **I think.**
 10 Q. While you were making the statement you dug them out?
 11 **A. Yes.**
 12 Q. If we look at the second page of the statement --
 13 **A. Yes.**
 14 Q. -- halfway down, in the middle, you have just put in
 15 brackets after the first piece of information you
 16 provided in bold, "Crime reports". Then you list three
 17 crime reports.
 18 **A. That's correct, yes.**
 19 Q. Then the second piece of information that you mentioned,
 20 you listed about a dozen crime reports?
 21 **A. That's correct.**
 22 Q. Then the third piece of information, you have listed
 23 about 10 crime reports?
 24 **A. Yes.**
 25 Q. Yes?

Page 39

1 **A. Yes.**
 2 Q. Do you agree that when you were making this witness
 3 statement there is a danger that you were writing down
 4 what you had read in the crime reports rather than what
 5 you had told Superintendent Ellison?
 6 **A. No.**
 7 Q. Why not?
 8 **A. Because I already knew the information. I had give it**
 9 **the night before.**
 10 Q. Why --
 11 **A. It was -- this statement was a fuller statement and the**
 12 **documents to evidence what I had said.**
 13 Q. Why did you need to make reference to the crime reports
 14 in order to set out what you had said?
 15 **A. Because this is an evidential statement that is now**
 16 **obviously being used, so there has to be some back up**
 17 **data.**
 18 Q. Would you agree that it is not necessary to access and
 19 read crime reports in order accurately to state what you
 20 had told Superintendent Ellison?
 21 **A. No, I wouldn't agree.**
 22 Q. Why do you need to access the crime reports in order
 23 accurately to state what you had told
 24 Superintendent Ellison?
 25 **A. I have to see the -- obviously especially in relation to**

Page 40

1 **the Operation Vulture, who was on the offender menu of**
 2 **every crime to make sure I was sending the right crimes.**
 3 Q. I think maybe we are talking at cross purposes or you
 4 are not understanding me. In order to set out in
 5 a witness statement, "On 25 January 2012 I told
 6 Superintendent Ellison this ..." You don't need to
 7 access any crime reports, do you?
 8 **A. No. No.**
 9 Q. If you are asked a separate question, "And please
 10 produce the crime reports that back up what you told
 11 him", then you do need to access the crime reports to
 12 get their numbers --
 13 **A. That's correct, yes.**
 14 Q. -- and include them?
 15 **A. Yes. This is now an evidential statement, so that is**
 16 **why I am doing it. The night before I knew the**
 17 **information, I didn't need to access the crime reports**
 18 **for that.**
 19 Q. Had you read the crime reports by the time you made this
 20 witness statement?
 21 **A. I had not read all of them, it was the MO -- the**
 22 **offender menu I was checking just to say I was sending**
 23 **the right information.**
 24 Q. You looked at the offender menu in particular?
 25 **A. In particular, yes, while I was making the statement.**

Page 41

1 Q. To see who was --
 2 **A. Connected to the crime, yes.**
 3 Q. -- connected or associated to the crime?
 4 **A. Yes.**
 5 Q. Can I look at the first issue then, which is the number
 6 of incidents operations or crimes that you had
 7 mentioned. If we go back to tab 12, please, we did this
 8 partially already.
 9 **A. Tab 12?**
 10 Q. Tab 12, which is the report of 18 July.
 11 **A. Yes.**
 12 Q. I think we have established, you have mentioned two
 13 crimes and two operations yes?
 14 **A. Could you just bear with me a sec while I remove it and**
 15 **I will put it aside with the other one, it might be**
 16 **easier.**
 17 Q. I am not going to make that comparison at the moment,
 18 I am going to do something different first.
 19 **A. I will do it so I am ready.**
 20 Q. Okay. Looking at tab 12?
 21 **A. Tab 12, yes?**
 22 Q. The report?
 23 **A. Yes.**
 24 Q. I have written a number 1 next to "The first", yes?
 25 **A. Yes.**

Page 42

1 Q. A number 2 next to "Another offence"?
 2 **A. Yes.**
 3 Q. A number 3 next to "I also mentioned"?
 4 **A. Yes.**
 5 Q. And then a number 4 over the page next to "Operation
 6 Ascot"?
 7 **A. That's correct, yes.**
 8 Q. Yes. We have got 1999, pump action shotgun, 2000,
 9 robbery in Bolton?
 10 **A. Yes.**
 11 Q. 2001, operation involving a kidnap?
 12 **A. Yes.**
 13 Q. Number 4, Operation Ascot?
 14 **A. That's correct, yes.**
 15 Q. Can we look, please, at tab 15 of this bundle. You
 16 should find in there Superintendent Ellison's notes --
 17 **A. Yes.**
 18 Q. -- of his, amongst other things, meeting with you?
 19 **A. Yes.**
 20 Q. They are on page 2321. Can you see that?
 21 **A. Yes.**
 22 Q. He has told us, he told us yesterday, that underneath
 23 the big black line, in the middle of the page, is his
 24 note of what you told him.
 25 **A. That's correct, yes.**

Page 43

1 Q. Okay. He has got 1, 2, 3, 4 in little numbers with
 2 a circle round them.
 3 **A. That's correct, yes.**
 4 Q. Number 1 he has down as that you told him that there
 5 was, "Serious organised crime group intelligence of
 6 Totton and [blank] ..." And we know that was Tansey
 7 from other information, it says Tansey under there, "...
 8 being chased into a property in Lower Broughton in
 9 1998".
 10 In your note it says 1999 but that may not matter
 11 for the moment.
 12 **A. Yes.**
 13 Q. "... and found close to hidden pump action shotgun. Not
 14 prosecuted despite neighbours knowing males at the
 15 address."
 16 **A. Yes.**
 17 Q. I think there is a match there between your number 1 in
 18 your report and his number 1 in his notes?
 19 **A. Yes.**
 20 Q. Yes?
 21 At the moment I am just looking at the numbers, I am
 22 not looking at the substance of the intelligence, I will
 23 come on to it in a moment.
 24 **A. No problem, okay.**
 25 Q. His number 2, Operation -- I will do it the other way

Page 44

1 round. His number 2:
 2 "Operation Ascot, 2005 investigative robbery of
 3 banks in Culcheth and Blackpool areas, Totton believed
 4 by the serious organised crime group to be involved in
 5 planning and recce of both premises without actually
 6 committing offence. Two associates receive 12-year
 7 sentences, Totton not prosecuted, firearms used."
 8 **A. Yes.**
 9 Q. You do mention, as your number 4 --
 10 **A. Ascot.**
 11 Q. -- Ascot.
 12 **A. Yes.**
 13 Q. Again I will come into the detail in a moment.
 14 His number 3:
 15 "Operation Botany, 2002, Totton implicated in kidnap
 16 of male with firearm but not prosecuted."
 17 **A. Yes.**
 18 Q. I think that is --
 19 **A. Number 3.**
 20 Q. -- your number 3, "I also mentioned an operation from
 21 2001".
 22 That is Operation Botany that you are talking about,
 23 yes?
 24 **A. Yes, sorry, yes.**
 25 Q. Then his fourth one is Operation Adequate 2010:

Page 45

1 "Totton observed picking up a car with another male
 2 and observing staff leaving bank premises, serious
 3 organised crime group intelligence suggests they were
 4 planning a kidnap."
 5 Do you see that?
 6 **A. That's correct, yes.**
 7 Q. You do not have that in your report, do you?
 8 **A. Yes. But again it is the conversation that I will**
 9 **elaborate on if you would like.**
 10 Q. So just to confirm at the moment, in your report of
 11 18 July you don't say that you told Mr Ellison about
 12 Operation Adequate in 2010, do you?
 13 **A. I don't say it in the report, no.**
 14 Q. Why is that?
 15 **A. Because I was -- I had mentioned Operation Botany and**
 16 **during the chronology up to Operation Adequate it is**
 17 **relevant that the offenders of Operation Botany turn up**
 18 **on Operation Adequate and the MO. Sorry the modus**
 19 **operandus, you can correct my Latin if you like.**
 20 Q. I am not following really that explanation --
 21 **A. Do you want me to explain, would that be easier?**
 22 Q. No, thank you.
 23 **A. Well you either ask me the question or you don't.**
 24 Q. I will ask you the question and the question is: why did
 25 you in your report of 18 July not say "I told Mr Ellison

Page 46

1 about Operation Adequate in 2010?"
 2 **A. Because it was during the conversation to do with**
 3 **Operation Botany.**
 4 Q. Thank you.
 5 At the foot of the first page of the report, where
 6 you say:
 7 "I also mentioned an operation from 2001 when
 8 a number of Totton's close associates were arrested in
 9 relation to tiger kidnap offences to get back at staff
 10 and Post Office staff, only one person was convicted
 11 from this inquiry."
 12 That should continue, "and this led into
 13 a discussion with Superintendent Ellison about
 14 an operation nine years later called Operation Adequate
 15 ..."
 16 **A. Yes.**
 17 Q. "... which I told him the following about ..."
 18 **A. Yes.**
 19 Q. Okay.
 20 Help us, why is it not in the report in that way?
 21 **A. Again, this was a brief report and then they came back**
 22 **to me obviously and said can you give us a fuller**
 23 **statement, please, of evidential standard. If it is the**
 24 **day after.**
 25 Q. Your second offence that you mentioned in your report,

Page 47

1 the robbery of 2000 in Bolton, yes?
 2 **A. Yes.**
 3 Q. We can see that there is not a mention of that in
 4 Mr Ellison's notes, is there?
 5 **A. That's correct.**
 6 Q. Does it come to this, that by reference to your report
 7 and his notes, you have three things in common that you
 8 mention, that you both agree were mentioned --
 9 **A. Yes.**
 10 Q. -- you have one down that he does not, that you told him
 11 about --
 12 **A. Yes.**
 13 Q. -- and he has one down that you do not?
 14 **A. Yes. He does go on to deal with the capability though,**
 15 **he does say:**
 16 **"SOCG intel indicating an involvement with criminal**
 17 **groups that are known to have used and discharged**
 18 **firearms, info and intel refers."**
 19 Q. Sorry, just point out to the chairman where that is?
 20 **A. If you go on to the second page, sorry, page 2323, in**
 21 **"Capability and pre-con", Mr Ellison writes, "Pre-con**
 22 **shows ..." The first bit is not relevant. The next bit**
 23 **is:**
 24 **"SOCG intel indicating an involvement with criminal**
 25 **groups that are known to have used and discharged**

Page 48

1 **firearms, intel and info refers."**
 2 Q. Are you saying that you think that --
 3 **A. Refers to the conversation we were having.**
 4 Q. The conversation as a whole but at the moment I am just
 5 trying to work out by reference to two documents which
 6 two police officers wrote, what information was passed
 7 between each of them.
 8 **A. Yes, you are right. But that is my explanation for --**
 9 **it was an ongoing conversation me and Mr Ellison had**
 10 **where I mentioned these crimes and developed them,**
 11 **because it is the same people involved in the crimes all**
 12 **the way through. And by that reference, it is --**
 13 **I think that is what he was describing. The original**
 14 **information I give him.**
 15 Q. Would you agree that on the face of these two documents,
 16 your written report and his notes, either we cannot work
 17 out or it is difficult to work out, even at a high level
 18 of generality, what information you gave to a firearms
 19 commander for the purposes of a decision whether police
 20 officers should be armed or not?
 21 **A. I -- that is not a question I can answer. All I can say**
 22 **is the information in my statement is what I give him**
 23 **and the conversation that we had. Leading up to it.**
 24 Q. Can I turn then, please, to the information concerning,
 25 insofar as it concerned Anthony Grainger. If we look,

Page 49

1 please, at tab 12, your report, can you agree that in
 2 this record of what you told Mr Ellison there is no
 3 mention of Mr Grainger having been convicted of any
 4 relevant offence?
 5 **A. In the report?**
 6 Q. Yes.
 7 **A. That's correct, yes.**
 8 Q. There is no mention of Mr Grainger having been charged
 9 with any offence.
 10 **A. That's correct.**
 11 Q. There is no mention of Mr Grainger having been arrested
 12 in respect of any offence?
 13 **A. That's correct. In relation to the report, yes.**
 14 Q. There is no mention of Mr Grainger doing anything
 15 specific or alleged to have done anything specific in
 16 relation to the two offences and the two operations that
 17 you mentioned?
 18 **A. In the report, that's correct.**
 19 **Again, it is obviously expanded on in the statement.**
 20 Q. It does say in the report, at the second paragraph from
 21 the bottom of the first page:
 22 "Stuart Grainger was charged with this offence, who
 23 is the brother of Anthony Grainger."
 24 **A. Yes.**
 25 Q. This is about the Bolton robbery --

Page 50

1 **A. Yes.**
 2 Q. -- where somebody discharged a MAC-10?
 3 **A. And a shotgun.**
 4 Q. And, well, a shotgun in the premises I think and
 5 a MAC-10 as an officer approached him outside the
 6 premises?
 7 **A. That's correct, both were discharged.**
 8 Q. You say Stuart Grainger was charged with this offence
 9 and that he is the brother of Anthony Grainger.
 10 **A. And I further go on to say that --**
 11 Q. Then you say:
 12 "Intelligence and association on the division around
 13 the time of this robbery suggested that Totton and the
 14 Graingers were committing this type of robbery,
 15 ie actually entering the banks to commit the robbery."
 16 **A. Yes.**
 17 Q. Did you tell that to Superintendent Ellison?
 18 **A. Yes, in the shape of Operation Vulture.**
 19 Q. Sorry?
 20 **A. I said that they had previously been arrested for lots**
 21 **of -- bank robberies and Post Office robberies and using**
 22 **a firearm. They were associates and --**
 23 Q. Hold on. Hold on. You said that you told
 24 Superintendent Ellison about Operation Vulture. That is
 25 not mentioned in this report either, is it?

Page 51

1 **A. The report saying that I said at the bottom, "The**
 2 **intelligence and association on the division around the**
 3 **time of the robbery suggested that Totton and Grainger**
 4 **were committing the type of robbery, ie actually**
 5 **entering the banks and committing robberies".**
 6 **That is what I mean by it was an ongoing**
 7 **conversation, so I had mentioned a crime and then my**
 8 **justification for it was the intelligence that they had**
 9 **been arrested together on Operation Vulture, then Totton**
 10 **gets this other crime that is recorded 1999 with the**
 11 **pump action shotgun to say that --**
 12 Q. 2000, according to this.
 13 **A. Yes, I am getting to that. Then in 2000,**
 14 **Stuart Grainger is implicated in this bank robbery with**
 15 **the gun. It is about the capability of a group and**
 16 **Totton at the time to have access to firearms.**
 17 Q. Would you agree that on the face of this report it
 18 doesn't say expressly that you told
 19 Superintendent Ellison that intelligence and association
 20 on the division, around the time of the robbery,
 21 suggested that Totton and the Graingers were committing
 22 this type of robbery?
 23 **A. The report does suggest that, yes.**
 24 Q. Where does it say that, "I told Superintendent ..."
 25 **A. It doesn't say specifically what I told him, but like**

Page 52

1 **I said I expanded on my evidential statement on that the**
 2 **next day.**
 3 Q. Let's look at that then, the evidence statement.
 4 **A. Okay.**
 5 Q. That is tab 6, the second page, can you see halfway
 6 down, just over halfway down, you say:
 7 "The second incident that I mentioned was a robbery
 8 that occurred in a bank in Bolton in 2000."
 9 Yes?
 10 **A. That's correct, yes.**
 11 Q. Then three paragraphs on, you say:
 12 "Intelligence and arrests of Totton for similar
 13 offences on the division in company with
 14 Anthony Grainger and Stuart Grainger at the time
 15 indicated Totton was part of the OCG with access to
 16 firearms/committing this type of offence using the MO of
 17 entering the banks to commit the robberies."
 18 **A. That's correct, yes.**
 19 Q. Do you agree that on the face of the statement you don't
 20 say you told Superintendent Ellison that, either?
 21 **A. Say again -- what the report says or what I actually**
 22 **told him, because that is the basis of what I told him.**
 23 THE CHAIRMAN: Just listen carefully. We will have a break
 24 in a bit, but just listen carefully to the question
 25 again.

Page 53

1 MR BEER: If you look at this page of the witness statement,
 2 six paragraphs down from the top --
 3 **A. Yes.**
 4 Q. -- it says:
 5 "The information I provided is as follows."
 6 Yes?
 7 **A. Yes.**
 8 Q. With a colon, and then there are two pages of statement,
 9 yes?
 10 **A. Yes.**
 11 Q. Some of the information here you didn't provide to
 12 Mr Ellison, because this is crime reports that you had
 13 dug out since?
 14 **A. That's correct, yes. Yes.**
 15 Q. What I am trying to discover is, in this witness
 16 statement, what is it that you told
 17 Superintendent Ellison and what you didn't tell him.
 18 **A. Yes.**
 19 Q. The paragraph:
 20 "Intelligence and arrests of Totton for similar
 21 offences on the division in company with Anthony and
 22 Stuart Grainger at the time indicated Totton was part of
 23 the OCG with access to firearms/committing this type of
 24 offence, using the MO of entering the banks to commit
 25 robberies."

Page 54

1 **A. That's correct, yes.**
 2 Q. Did you tell him that?
 3 **A. Yes. And then I justified -- I told him the**
 4 **justification for that was Operation Vulture underneath**
 5 **as alluded to in the paragraph above, and Totton's**
 6 **arrest in 1999 with a pump access shotgun and conspiracy**
 7 **for robbery with Lee Tansey.**
 8 Q. A couple of things arising from that,
 9 Superintendent Ellison's note, as we have seen, has no
 10 record of you saying anything about the pump action
 11 shotgun and the MAC being used in Bolton in 2000?
 12 **A. It has, the pump action shotgun was not used in Bolton**
 13 **in 2000. That was a shotgun and a MAC-10. The pump**
 14 **action shotgun was from 1999.**
 15 Q. Okay. His notes don't have you referring to the shotgun
 16 or the MAC-10 used in Bolton in 2000, have they?
 17 **A. They have got the capability and mentioning that**
 18 **firearms were discharged. I think that is how he must**
 19 **have recorded it.**
 20 Q. He has told us that the section that we have looked at,
 21 underneath the black line on the first page, was what
 22 you told him and then the capability section was after
 23 he had sat down on his own with the TAC adviser, forming
 24 up a conclusion on what he thought the capability of the
 25 subjects as a whole was -- the subject was?

Page 55

1 **A. Again, I don't know, could you just direct me back to**
 2 **the divider, that is not quite what it says I don't**
 3 **think.**
 4 THE CHAIRMAN: It is 15.
 5 **A. Thank you.**
 6 MR BEER: Yes, 15, 2323.
 7 **A. Thank you.**
 8 **Who did you say that he had sat down with, with the**
 9 **adviser?**
 10 Q. The TAC adviser, afterwards.
 11 **A. The TAC adviser.**
 12 **It says "SOCG intelligence", which is me.**
 13 Q. Yes, he is referring to back to SOCG intelligence.
 14 **A. "Indicating an involvement with criminal groups that are**
 15 **known to have used and discharged firearms."**
 16 **Other than the matters that we have -- you are**
 17 **mentioning, where else is that recorded in what I have**
 18 **told him?**
 19 Q. What you are saying is Mr Ellison was told about the
 20 Bolton incident --
 21 **A. Absolutely.**
 22 Q. -- he has failed to record it on his page 2321?
 23 **A. But he has recorded that the firearms have been**
 24 **discharged. I mentioned two occasions where firearms**
 25 **were discharged.**

Page 56

1 Q. That is on 2323, yes?
 2 **A. Yes. Again I can't answer for him, but --**
 3 Q. No, of course.
 4 **A. All I am saying is SOCG is me and it is mentioning**
 5 **firearms discharged, whereas on the first page it**
 6 **doesn't mention, to my knowledge, does it?**
 7 **"Firearms used", it doesn't mention firearms**
 8 **discharged. Whereas on the next page, under**
 9 **"Capability" it does, which, obviously, leads to the**
 10 **conclusion he has been told that firearms have been**
 11 **discharged during the briefing. Which I told him on two**
 12 **occasions.**
 13 Q. You say in your witness statement that intelligence and
 14 arrest of Totton for similar offences on the division in
 15 company with the Graingers at the time, ie at the time
 16 of the robbery in Bolton in 2000?
 17 **A. Yes.**
 18 Q. Operation Vulture was not at the time, was it?
 19 **A. It is within 1996, four years' time, 1996, 1999, 2000.**
 20 Q. Why were you telling him that Mr Anthony Grainger had
 21 been arrested at the time of the Bolton robbery in 2000?
 22 **A. I mentioned every offence, sir, I spoke about that**
 23 **I mentioned the people involved.**
 24 Q. No, why were you telling him that Anthony Grainger had
 25 been arrested at, in about 2000, or at about the time of

Page 57

1 the robbery in 2000, for similar offences of robbery?
 2 **A. Because it was relevant to the offence.**
 3 Q. Was Mr Grainger arrested at around the time of the
 4 offence in 2000 for committing robberies?
 5 **A. He was arrested for Operation Vulture in 1996.**
 6 Q. Is that around the time of 2000?
 7 **A. Yes, I would say it was relevant. Around the time.**
 8 **Same MO, same offence. And then 1999 with Totton as**
 9 **well.**
 10 Q. You told him about 1999 as well, yes?
 11 **A. Yes, I did.**
 12 Q. That is the running into the premises?
 13 **A. That's correct, yes.**
 14 MR BEER: Sir, that might be a convenient moment, thank you?
 15 THE CHAIRMAN: Certainly. We will take a break at this
 16 point.
 17 We will take a break until 11.55.
 18 (11.46 am)
 19 (A short adjournment)
 20 (12.04 pm)
 21 THE CHAIRMAN: Thank you, Mr Beer.
 22 MR BEER: Ms Whyte has kindly drawn to my attention -- if we
 23 turn up tab 5, please -- the following. The date on the
 24 statement in tab 5, handwritten above "28/8/12" is
 25 "19/9/12", not "19/7/12".

Page 58

1 THE CHAIRMAN: I see, right. In my copy it is completely
 2 illegible.
 3 MR BEER: Right. Then if we go on to tab 6, there is
 4 a statement dated 19/7/12, which is the same statement.
 5 THE CHAIRMAN: Right.
 6 MR BEER: Do you know how that has come about?
 7 **A. I don't I am afraid.**
 8 Q. Okay, thank you.
 9 Can we go to tab 13, please.
 10 Do you know which date is correct?
 11 **A. I don't I am afraid.**
 12 Q. Thank you.
 13 Can we go on to tab 13, please.
 14 **A. Yes, I am there.**
 15 Q. I was asking you about the paragraph at the foot of the
 16 page, one paragraph up, which says:
 17 "Stuart Grainger was charged with this offence."
 18 That was the 2000 offence in Bolton, yes?
 19 **A. Yes.**
 20 Q. Then it continues:
 21 "Intelligence and association on the division around
 22 the time of the robbery suggested that Totton and the
 23 Graingers were committing this type of robbery."
 24 Yes?
 25 **A. Yes.**

Page 59

1 Q. Then looking back at your request, your witness
 2 statement, if we go back to tab 6 to see what you said
 3 about this in the witness statement.
 4 **A. Yes.**
 5 Q. In tab 6, at the second page --
 6 **A. Would you just bear with me a second, please, thank you.**
 7 Q. -- three paragraphs from the bottom?
 8 **A. Yes.**
 9 Q. It says:
 10 "Intelligence and arrests of Totton for similar
 11 offences on the division, in company with Grainger,
 12 Stuart and Grainger, Anthony at the time indicated that
 13 Totton was part of the OCG with access to
 14 firearms/committing this type of offence."
 15 Do you see that?
 16 **A. That's correct, yes.**
 17 Q. That seems to be a repeat of what is in the report in
 18 the penultimate paragraph that we have just looked at.
 19 **A. The first paragraph you read, yes.**
 20 Q. Yes.
 21 **A. Correct.**
 22 Q. Then you say in the witness statement:
 23 "Totton, Anthony Grainger, Stuart Grainger and
 24 Peter Anderson prior to this incident had been
 25 co-accused on Operation Vulture, an investigation into

Page 60

<p>1 robberies on Post Offices and banks using firearms and 2 sledgehammers." 3 A. That's correct, yes. 4 Q. Do you see that? 5 A. Yes, I do. 6 Q. Which seems to be a different thing? 7 A. No, the first paragraph is a title paragraph. 8 Q. Sorry? 9 A. The first paragraph is a title paragraph and then 10 that's -- 11 Q. A title? 12 A. A title paragraph, and then that is the justification 13 underneath. Operation Vulture. It is the way I have 14 written it. 15 So, "On entering the banks to commit robberies using 16 firearms", then the justification: 17 "Totton, A Grainger, S Grainger and Peter Anderson 18 prior to the incident have been accused on Operation 19 Vulture, an investigation into robberies on Post 20 Offices, so prior to the incident above." 21 Q. Where it says in the third paragraph from the bottom, 22 "Intelligence and arrest of Totton in company with 23 Grainger and Grainger". 24 A. Yes. 25 Q. That means intelligence and arrests of Totton, arrests</p> <p style="text-align: center;">Page 61</p>	<p>1 was involved at this point? 2 A. Because it was a chronology of the same names that were 3 coming up in the stuff I had spoke about, so I put it 4 back later on. 5 Q. I don't understand that. Why didn't you mention 6 Stuart Ellis in this statement? 7 A. For example, Operation Vulture, you have got Totton, 8 Grainger, Grainger and Anderson. Operation Botany, in 9 the chronology, then comes on to another few males, 10 including -- and then it rolls into Ascot with 11 Peter Anderson is involved in that one as well and 12 Anthony Grainger and so on. So Stuart Ellis, that was 13 the only time he appeared in the chronology I was 14 talking about. 15 Q. Did you or did you not mention Stuart Ellis to 16 Mr Ellison on 25 January? 17 A. I don't recall that -- but I knew he was involved. 18 Q. Operation Vulture I think ran principally in 1995 and 19 1996 -- 20 A. Yes. 21 Q. -- and as you say went to trial in 1997. Were you an 22 investigating officer on it? 23 A. I wasn't, no. 24 Q. Did you have any part to play in it? 25 A. No.</p> <p style="text-align: center;">Page 63</p>
<p>1 of Grainger and arrests of Stuart Grainger? 2 A. Yes, and Peter Anderson it mentions as well. 3 Q. Yes, okay. 4 A. So that, if you like, is the justification for the 5 title -- the paragraph above, which I was alluding to 6 before. 7 Q. In short, you are saying that you did tell 8 Superintendent Ellison about Operation Vulture? 9 A. That's correct, yes. 10 Q. Which was about robberies in 1995 and 1996? 11 A. Yes, and went to trial in 1997, I think. They were on 12 remand until 1997. 13 Q. You told him that therefore at the time of the robbery 14 in 2000 Anthony Grainger had also been arrested for 15 robberies in which firearms had been carried? 16 A. In relation to Operation Vulture, yes. But the main -- 17 we didn't know about Anthony Grainger at that point, so 18 the main briefing was about David Totton but I did 19 mention the co-accused in the crimes that I was 20 referring to. 21 Q. You mentioned Anthony Grainger by name, did you? 22 A. I did, yes, and Stuart Grainger by name and 23 Peter Anderson and -- yes, and Stuart Ellis as well, but 24 I didn't put it in the statement at this point. 25 Q. Why didn't you put it in the statement that Stuart Ellis</p> <p style="text-align: center;">Page 62</p>	<p>1 Q. How did you have all of this detailed knowledge about -- 2 A. From -- sorry. 3 Q. -- who had been arrested for what? 4 A. I have spoke to the case officers at some point, I have 5 read the MG5 and just from being on the division, people 6 were aware that they had been arrested for these 7 offences. 8 Q. Presumably, if you were passing on information to 9 a silver firearms commander, you would also pass on how 10 the operation ended? 11 A. That's correct, yes. 12 Q. Did you have a good working knowledge not only of the 13 start of the operation but also the outcome of it? 14 A. Yes, my briefing was more in the outcome of the 15 operation, the actual proactive part of it because that 16 is the information that we, as the Robbery Unit, would 17 be more involved in. 18 Q. Can I examine with you please the outcome of Operation 19 Vulture, briefly if we can, can we take out file 20 G2/1168, please. 21 A. Thank you. 22 Sir, can I borrow your desk again? 23 THE CHAIRMAN: Yes, of course. 24 MR BEER: Can we start, please, at G2/1168B. 25 A. Sorry, where are the reference numbers on the file?</p> <p style="text-align: center;">Page 64</p>

<p>1 Q. In the top right-hand side. It is about three inches 2 into the file. 1168B. 3 A. Sorry, is there a page number, sorry? 4 Q. Yes, 1168B. 5 A. It may be. 6 THE CHAIRMAN: It may be a differently organised file. If 7 it is like mine it may be towards the end, at the top 8 right you may see some very small printed numbers? 9 A. Yes. 10 THE CHAIRMAN: You want 1168 and then the page after that 11 has been inserted afterwards and has a handwritten 12 number is 1168B. 13 A. I do apologise, the numbers at the top start at 623. 14 THE CHAIRMAN: You will need to move on to get to 1-1 15 something. 16 A. Sorry, 11 ... apologies. Give me that page number 17 again. 18 THE CHAIRMAN: It is 1168B, if it is like my copy you will 19 find it is very near to the back of the bundle so you 20 need to go right to the back. You should find the 21 1100 pages near the back in small printed numbers top 22 right of the page. 23 A. 1168? 24 It is not there, sorry, I do apologise. It goes to 25 1170. It goes 1166 to 1170.</p> <p style="text-align: center;">Page 65</p>	<p>1 Anthony Grainger, Stuart Ellison -- sorry, five people, 2 Peter Anderson, David Totton and Stuart Grainger. 3 A. Yes. 4 Q. The second count is against Anthony Grainger, 5 Stuart Ellis, Peter Anderson and David Totton of 6 a robbery on 10 June 1996. 7 A. Yes. 8 Q. The third count is against Anthony Grainger and 9 David Totton of a robbery of Martin Stevens on 10 31 May 1996? 11 A. Yes. 12 Q. Count 4, same people, same day, but of Melanie Cavanagh? 13 A. Yes. 14 Q. Count 5, Peter Anderson and Stuart Grainger on 15 9 October 1995 robbing Paul Wilcock and Susan Wilcock of 16 cash. 17 A. Yes. 18 Q. Count 6, an attempted robbery alleged against 19 Peter Anderson, Stuart Grainger and Anthony Grainger on 20 14 November 1995, again Paul Wilcock and Susan Wilcock, 21 yes? 22 A. Yes. 23 Q. Yes, so I think Mr Grainger, Anthony Grainger, is named 24 five times in that indictment -- 25 A. Yes.</p> <p style="text-align: center;">Page 67</p>
<p>1 THE CHAIRMAN: Right. 2 MR BEER: We need to rise to sort it out then. 3 THE CHAIRMAN: Yes, okay. 4 (12.14 pm) 5 (A short adjournment) 6 (12.20 pm) 7 MR BEER: Sir, apologies for the interruption to 8 proceedings. 9 THE CHAIRMAN: These things happen. 10 MR BEER: It is probably my fault, if you remember I have 11 asked more than one witness to take the indictment out 12 to be able to compare it with two other bundles. 13 THE CHAIRMAN: Yes, it will be a simple explanation of that 14 kind. 15 MR BEER: Thank you. 16 Can we go to the first indictment, as it then was 17 please, at 1168B, yes? 18 A. Yes. 19 Q. Can you see between 1168B and 1169, there is a six-count 20 indictment? 21 A. Yes. 22 Q. If we can just look at each count on the indictment. 23 A. Yes. 24 Q. The first is a conspiracy to rob, between 8 October 1995 25 and 11 June 1996. Alleged against three people,</p> <p style="text-align: center;">Page 66</p>	<p>1 Q. -- on counts 1, 2, 3, 4 and 6. 2 A. Yes. 3 Q. The only count he is not named in is count 5. 4 A. Yes. 5 Q. We can see at the top of 1168B that the indictment was 6 stayed by His Honour Judge Owen. 7 A. Yes. 8 Q. It seems that in its place, an indictment that starts at 9 page 1167 was preferred, if you go back to 1167. 10 A. Yes, I am on 1167. 11 Q. Thank you. 12 You can see by looking between 1167 and 1168A that 13 this is a four-count indictment, yes? 14 A. Yes. 15 Q. If we can just look at the new indictment to confirm the 16 counts on it, robbery, against Mr Anderson alone on 17 9 October 1995? 18 A. Yes. 19 Q. That I think we can see had previously been against 20 Peter Anderson and Stuart Grainger, but Stuart Grainger 21 has been dropped, yes? 22 A. Yes. 23 Q. Count 2, an attempted robbery, alleged against 24 Stuart Grainger alone, previously that I think had been 25 count 6 --</p> <p style="text-align: center;">Page 68</p>

<p>1 A. Yes.</p> <p>2 Q. -- against Peter Anderson, Stuart Grainger and</p> <p>3 Anthony Grainger, so Peter Anderson and Anthony Grainger</p> <p>4 had been dropped from that.</p> <p>5 A. That's correct.</p> <p>6 Q. Yes?</p> <p>7 The third count was a conspiracy to rob against</p> <p>8 David Totton and Anthony Grainger alone on 31 May. If</p> <p>9 that was previously count 1, then three people have been</p> <p>10 dropped from it and the date has been reduced from</p> <p>11 an eight-month period to a single day?</p> <p>12 A. Yes.</p> <p>13 Q. Yes?</p> <p>14 Count 4, substantive robbery, David Totton,</p> <p>15 Anthony Grainger, Stuart Ellison and Peter Anderson</p> <p>16 robbing on 10 June 1996.</p> <p>17 A. That's correct, yes.</p> <p>18 Q. Which I think was previously count 2 on the indictment.</p> <p>19 I think that stayed the same?</p> <p>20 A. Yes.</p> <p>21 Q. Can we do some marrying up with the crime reports and</p> <p>22 the court results sheets of the indictment that was</p> <p>23 preferred. Using the new indictment, count 1 --</p> <p>24 A. Yes.</p> <p>25 Q. -- if you can take out -- look at, in the same bundle,</p> <p style="text-align: center;">Page 69</p>	<p>1 the court result sheet for him. The conspiracy to rob,</p> <p>2 it is the first entry, not guilty on the judge's</p> <p>3 direction.</p> <p>4 A. Yes.</p> <p>5 Q. Count 4, this was a robbery against four men, Mr Ellis</p> <p>6 to start with, so it is everyone apart from</p> <p>7 Stuart Grainger.</p> <p>8 Mr Ellis if you look at 1157, count 4, not guilty on</p> <p>9 the judge's direction.</p> <p>10 A. Sorry, let me just catch up on to that.</p> <p>11 Q. That is all right.</p> <p>12 A. Yes.</p> <p>13 Q. Mr Anthony Grainger, 1160. Not guilty --</p> <p>14 A. By judge's -- yes.</p> <p>15 Q. -- on the judge's direction.</p> <p>16 Mr Anderson, 1163, count 4 is the second one</p> <p>17 mentioned there, not guilty on the judge's direction.</p> <p>18 Then finally David Totton, 1166, the second one</p> <p>19 mentioned there is count 4.</p> <p>20 A. 4, yes.</p> <p>21 Q. So not guilty on the judge's direction.</p> <p>22 I think we know from those pages, amongst other</p> <p>23 things, that the judge directed the jury to find</p> <p>24 Mr Anthony Grainger not guilty of all offences alleged</p> <p>25 against him, ie both offences alleged against him --</p> <p style="text-align: center;">Page 71</p>
<p>1 page 1163. If you just go back to 1161, you can see</p> <p>2 there is a court result sheet for Peter Anderson. It</p> <p>3 concludes on 1163 --</p> <p>4 A. Yes.</p> <p>5 Q. -- and ends with count 1 being the acquittal of</p> <p>6 Mr Anderson on the judge's direction.</p> <p>7 A. Yes.</p> <p>8 Q. Then count 2 on the indictment, please.</p> <p>9 A. Yes.</p> <p>10 Q. Against Stuart Grainger alone --</p> <p>11 A. Yes.</p> <p>12 Q. -- on 14 November 1995.</p> <p>13 A. Yes.</p> <p>14 Q. If you look at page 1154, that was the only count</p> <p>15 against him and the decision of the court was that it</p> <p>16 should remain on the file.</p> <p>17 A. Yes.</p> <p>18 Q. Count 3, the conspiracy to rob against Mr Totton and</p> <p>19 Mr Grainger, Anthony Grainger, on 31 May.</p> <p>20 A. Yes.</p> <p>21 Q. If we go to 1166, I think we will see that is the court</p> <p>22 result sheet of David Totton for count 3, discharged on</p> <p>23 the trial judge's direction?</p> <p>24 A. Yes.</p> <p>25 Q. Then in relation to Anthony Grainger, 1160, we will see</p> <p style="text-align: center;">Page 70</p>	<p>1 A. That's correct.</p> <p>2 Q. -- on the new indictment for which he was charged?</p> <p>3 A. Yes.</p> <p>4 Q. Which was 31 May 1996 conspiracy offence and the</p> <p>5 10 June 1996 robbery offence?</p> <p>6 A. Yes, that's correct.</p> <p>7 Q. Can we then turn, please, to G2/1350.</p> <p>8 THE CHAIRMAN: If the previous volume is being put away, or</p> <p>9 even if it is not, would it be a good idea to put back</p> <p>10 the pages that have been just been removed?</p> <p>11 MR BEER: Yes, if the witness did, I don't think he did</p> <p>12 remove them.</p> <p>13 THE CHAIRMAN: Yes, some have been removed.</p> <p>14 A. Yes, I did.</p> <p>15 MR BEER: Yes, I think put them back first or in four weeks'</p> <p>16 time we will be here again.</p> <p>17 THE CHAIRMAN: It will take an extra half minute now but</p> <p>18 save five or ten four weeks down the line.</p> <p>19 A. Sorry, could you just give me that reference again?</p> <p>20 MR BEER: 1350, please.</p> <p>21 A. Apologies, it is me. My hands are goosed.</p> <p>22 Q. 1350, this should be a crime report numbered 277215Y of</p> <p>23 1995.</p> <p>24 A. That's correct, yes.</p> <p>25 Q. You can see that it is in relation to a robbery at the</p> <p style="text-align: center;">Page 72</p>

1 Holyrood Post Office, alleged to have been committed on
 2 14 November 1995.
 3 **A. Not alleged, it was committed.**
 4 Q. Sorry?
 5 **A. Sorry.**
 6 Q. We can see that I think that appears to be count 6 on
 7 the stayed indictment?
 8 **A. Yes.**
 9 Q. Is that right?
 10 **A. I would have to get my bundle back.**
 11 Q. Best you do it rather than me saying it.
 12 THE CHAIRMAN: Mrs Shaw, would you give the witness a hand
 13 because he has an injury which makes it harder to work
 14 with.
 15 **A. Is it the indictment you want me to get back out that**
 16 **I have put it away?**
 17 MR BEER: I didn't know you had put it away.
 18 THE CHAIRMAN: That is my fault.
 19 **A. Yes, it was the chairman's direction, sorry.**
 20 MR BEER: Yes, 1169, please. Do you have that?
 21 **A. I have now. Just 1169, yes, thank you. Sorry.**
 22 Q. Can you see that that appears to be count 6 on the
 23 stayed indictment?
 24 **A. Yes.**
 25 Q. On the actual indictment, which is 1167, I think you

Page 73

1 have to be provided with that, can we see that it was
 2 count 2, 1167 on to 1168.
 3 **A. Yes.**
 4 Q. We can see that Mr Grainger, Anthony Grainger, was no
 5 longer a defendant?
 6 **A. Anthony Grainger?**
 7 Q. Yes.
 8 **A. Yes, that's correct.**
 9 Q. He was named on the stayed indictment but not on the
 10 ultimately preferred indictment?
 11 **A. Anthony, yes, that's correct, yes.**
 12 Q. Yes.
 13 The crime report, I think, suggested that two people
 14 performed the robbery. Is that right?
 15 **A. Yes.**
 16 Q. On the stayed indictment, three men were named as
 17 defendant --
 18 **A. Yes.**
 19 Q. -- defendants, is that right?
 20 **A. Yes. Which indictment was that, just remind me again,**
 21 **the number.**
 22 Q. The stayed indictment on 1169?
 23 **A. 1169, what number it was it, sorry?**
 24 Q. Count 6.
 25 **A. Right, yes. Thank you, sorry.**

Page 74

1 Q. So on the preferred indictment, the allegation was not
 2 made against Mr Grainger?
 3 **A. For that particular crime?**
 4 Q. Yes.
 5 **A. Yes.**
 6 Q. When you were briefing up Mr Ellison, did you know this?
 7 **A. No.**
 8 Q. Can we look, please, at G2/1282, that is back in the
 9 first volume that we looked at, G2/1282.
 10 **A. Do I need the indictment still?**
 11 Q. Yes.
 12 **A. Yes, thank you.**
 13 **Sorry.**
 14 Q. There should be a crime report 138668L of 1996.
 15 **A. Yes.**
 16 Q. Can you see that the crime is alleged to have been
 17 committed on 31 May 1996?
 18 **A. Yes.**
 19 Q. Does that appear to be counts 3 and 4, namely
 20 a conspiracy and a robbery on the stayed indictment?
 21 **A. Yes.**
 22 Q. Does it appear to be count 3 on the preferred
 23 indictment?
 24 **A. Yes.**
 25 Q. So Mr Grainger, Anthony Grainger, the allegation was no

Page 75

1 longer made against him of the act of the robbery,
 2 ie the substantive offence of robbery, but instead to
 3 conspire?
 4 **A. To conspire. I don't know what the actual role was on**
 5 **the basis of the indictment or the evidence on that**
 6 **particular one.**
 7 Q. To what extent did you know all of this when you were
 8 briefing Mr Ellison up?
 9 **A. To do with the crime reports? I hadn't referred to the**
 10 **crime reports.**
 11 Q. You were going off memory, effectively, from --
 12 **A. Yes, MG5s, yes, to do with the strike day more than**
 13 **anything else on Operation Vulture, to do with the**
 14 **Adelphi Post Office.**
 15 Q. Right, so you were dealing with the arrest day?
 16 **A. Yes, and who was involved in that and the recovery of**
 17 **a live firearm.**
 18 Q. Why would you brief up on what had happened on the
 19 strike day rather than after the investigation had been
 20 completed and --
 21 **A. I wasn't involved in the investigation, as I said**
 22 **previous. However, with my briefing I was giving, it**
 23 **was to do with David Totton, who had been arrested on**
 24 **the strike day, and it was in relation to the capability**
 25 **of using firearms and a firearm was recovered on the**

Page 76

1 **strike day. I didn't go into all the crime reports and**
 2 **the indictments and I haven't done since, other than to**
 3 **look at the OM pages to make sure that I was attaching**
 4 **the right conspiracy crimes.**
 5 Q. You know, I think, the importance of the National
 6 Intelligence Model?
 7 **A. I do.**
 8 Q. Is one of the -- amongst many other requirements of it,
 9 a requirement that when intelligence is disseminated, it
 10 ought to be graded?
 11 **A. Yes.**
 12 Q. What grading did you apply to the intelligence
 13 concerning Anthony Grainger that you disseminated to
 14 Mr Ellison?
 15 **A. I didn't give a rating.**
 16 Q. What grading did you apply to the intelligence that you
 17 disseminated in relation to Mr Totton?
 18 **A. I didn't.**
 19 Q. What grading did you apply to any of the intelligence
 20 you disseminated?
 21 **A. In relation to what?**
 22 Q. Anything.
 23 **A. Well, the stuff that was on the intelligence chronology**
 24 **that I handled and managed was already rated, but in**
 25 **relation to that briefing I didn't put any rating on any**

Page 77

1 **of it.**
 2 Q. You didn't pass on any of the intelligence on the
 3 intelligence chronology?
 4 **A. No.**
 5 Q. This was you being brought into the room to be given the
 6 opportunity to speak about things that had occurred in
 7 the past and not in the course of this operation?
 8 **A. That's correct.**
 9 Q. Why didn't you provide grading for the intelligence you
 10 were passing on?
 11 **A. I can't give an answer for that. It was just a briefing**
 12 **that I was called into. It was from my knowledge.**
 13 **There was no document prepared or dissemination or**
 14 **anything like that, to anyone other than Mr Ellison.**
 15 Q. What did you appreciate the purpose of you being brought
 16 in to be?
 17 **A. David Totton had just been identified, or identified**
 18 **that afternoon, as the driver of the Audi, so it was**
 19 **a briefing in relation to David Totton, his capability,**
 20 **and access to firearms and I gave it on association as**
 21 **well, of jobs he had been involved or implicated or his**
 22 **wider conspiracy -- OCG had been.**
 23 Q. You appreciated that you were briefing a silver firearms
 24 commander?
 25 **A. I did, yes.**

Page 78

1 Q. You would know that therefore the purpose of speaking to
 2 him was to enable him better to make a decision about
 3 whether to allow firearms officers to deploy with guns?
 4 **A. That's correct.**
 5 Q. You would therefore no doubt appreciate the importance
 6 of passing on what you knew accurately, but also in
 7 grading it, wouldn't you?
 8 **A. It is correct to say that I would pass it on accurately**
 9 **but it is down to him to develop the tactics he wants to**
 10 **use. I am providing the information; I have no input on**
 11 **how he uses that intelligence to come up with**
 12 **a strategy.**
 13 Q. The tactics that he decides to use and the strategy that
 14 he adopts are a different thing, aren't they? I am
 15 talking about your responsibility to pass on graded
 16 intelligence. You know now, don't you, that that is
 17 what you should have done?
 18 **A. No, not necessarily.**
 19 Q. Why not?
 20 **A. It wasn't graded intelligence, it was from personal**
 21 **knowledge, so it doesn't appear anywhere. You could say**
 22 **A11 but I don't even think we now use A11 anymore, which**
 23 **is known personally, we just don't use it.**
 24 Q. In fact on Mr Ellison's notes we can see some A11
 25 intelligence that he was given.

Page 79

1 **A. Can you just direct me to the divider again, please, if**
 2 **you are referring to it?**
 3 Q. Yes, if you don't accept what I say. Tab 15, page 2311.
 4 **A. Say again, sorry?**
 5 Q. Tab 15, page 2321.
 6 Can you see in the intelligence grading column, A11,
 7 A11?
 8 **A. Yes.**
 9 Q. If you go back a page to 2319, at the foot of the page,
 10 he has included three lots more of grading there.
 11 **A. Yes.**
 12 Q. Then there is some other graded intelligence further up
 13 the page.
 14 **A. Yes.**
 15 Q. Why don't you accept that you should have graded this
 16 intelligence?
 17 **A. Like I said, it was not in my remit of knowledge, I will**
 18 **have to hold my hands up to that one.**
 19 Q. Thank you.
 20 Had you by this time seen any subject profiles of
 21 the targets of the operation?
 22 **A. No. No.**
 23 Q. Did you ever see the subject profile for Mr Grainger?
 24 **A. I must have at some point, because I was the disclosure**
 25 **officer. But at what point that was, it wasn't around**

Page 80

1 **this time.**
 2 Q. It wasn't around January time?
 3 **A. Yes, because it was not in existence as far as I know.**
 4 Q. No, I think we only see it existing from 7 February
 5 onwards.
 6 **A. I will take your word for that one.**
 7 Q. Do you think you saw it between 7 February and 3 March?
 8 **A. I couldn't answer that question, sorry.**
 9 Q. Okay, well I will not ask you questions about its
 10 contents then.
 11 **A. Okay, thank you.**
 12 Q. Some of the other intelligence that you passed on was
 13 concerning a robbery in Bolton in 2000.
 14 **A. That's correct, yes.**
 15 Q. I have already explored with you the question of whether
 16 at the briefing you suggested that Mr Grainger was
 17 involved in it or not.
 18 **A. Anthony?**
 19 Q. Yes.
 20 **A. That was a capability offence of the wider OCG having**
 21 **access to firearms, as I tried to explain.**
 22 Q. Can we look, please, at tab 5 of the bundle, and at the
 23 bottom of page 2 of your witness statement.
 24 **A. Page 2, bundle 2? Yes.**
 25 Q. Two paragraphs up from the bottom where you say:

Page 81

1 "Totton, Anthony Grainger, Stuart Grainger and
 2 Peter Anderson prior to this incident had been accused
 3 on Operation Vulture."
 4 I have already asked you about that.
 5 **A. Yes.**
 6 Q. Was that the only context in which you were suggesting
 7 that Anthony Grainger had some connection to the Bolton
 8 robbery in 2000?
 9 **A. It wasn't to do with Anthony Grainger at that point, it**
 10 **was to do with David Totton. It is from the briefing of**
 11 **Mr Ellison that Anthony Grainger hadn't come into it or**
 12 **hadn't been identified at that point. I was naming**
 13 **associates of the wider OCG.**
 14 Q. I see, so maybe I will approach it the other way round.
 15 What did you say about Anthony Grainger to Mr Ellison?
 16 **A. I said about David Totton, that he had been arrested in**
 17 **the past and charged with Vulture and then this other**
 18 **thing with a pump action shotgun in 1999 and then 2000**
 19 **another associate, Stuart Grainger, who was a co-accused**
 20 **in 2000 – 1999, 1996, had been linked to this machine**
 21 **gun and the firearms discharge of the shotgun. I didn't**
 22 **mention Anthony Grainger in relation to that,**
 23 **categorically.**
 24 Q. Right.
 25 **A. It was all to do with Stuart that, and his association**

Page 82

1 **with David Totton.**
 2 Q. What, if anything, did you say about Anthony Grainger at
 3 all to Mr Ellison?
 4 **A. I mentioned him in relation to Operation Vulture.**
 5 Q. What did you say?
 6 **A. That he was a co-accused and a firearm was recovered.**
 7 Q. What you were saying was that this is all about
 8 David Totton?
 9 **A. It is all about David Totton, yes, but these are the**
 10 **other people --**
 11 Q. There are some other people and 16 years ago, he was
 12 a co-accused?
 13 **A. Well, if -- Operation Ascot as well I mentioned**
 14 **Anthony Grainger as well, in 2006.**
 15 Q. You said 16 years ago, in 1995/1996 he was a co-accused?
 16 **A. Yes.**
 17 Q. That is one thing.
 18 **A. Yes.**
 19 Q. What was the purpose of saying that to him?
 20 **A. Because it was to do with firearms, isn't it?**
 21 **David Totton and his wider group have access to**
 22 **firearms.**
 23 Q. When you were telling things to Mr Ellison, were you
 24 doing it like you are to me now?
 25 **A. Yes.**

Page 83

1 Q. Saying, "Well, it is to do with firearms", "He was
 2 a co-accused"?
 3 **A. He was a co-accused, yes and it is the wider group that**
 4 **have access to the firearms.**
 5 Q. Do you appreciate that saying things in that way may be
 6 said to lack specificity?
 7 **A. Specificity? Hmm.**
 8 Q. It may be said to lack particularity?
 9 **A. No.**
 10 **Anthony Grainger and David Totton were arrested for**
 11 **a conspiracy, Operation Vulture, a live firearm was**
 12 **recovered.**
 13 **David Totton was arrested in 1999 with Lee Tansey,**
 14 **a live firearm was recovered.**
 15 **2000, a co-accused of David Totton from Operation**
 16 **Vulture, Stuart Grainger, was linked to the discharge of**
 17 **two firearms, a shotgun and a MAC-10.**
 18 **2001, I then moved on to tiger kidnaps that**
 19 **developed into Operation Ascot where Anthony Grainger**
 20 **and David Totton on 27 April are seen moving a load of**
 21 **stolen cars around in the area towards Culcheth. The**
 22 **day after, the other lad that was with him,**
 23 **Peter Anderson is arrested with firearms that are**
 24 **discharged at police officers.**
 25 **That is the chronology --**

Page 84

1 Q. Yes.
 2 **A. -- of what I was getting at.**
 3 Q. What were you getting at?
 4 **A. The wider access to firearms of the group. Who**
 5 **David Totton, who had been identified at that time, was**
 6 **the subject.**
 7 Q. Was the sting of what you were saying, the nub of what
 8 you were saying, that the wider group, including
 9 Anthony Grainger, had access to firearms?
 10 **A. It wasn't in relation to Anthony Grainger at that point.**
 11 **I mentioned other people that were involved in jobs that**
 12 **Totton had been implicated in. It wasn't in relation to**
 13 **Anthony Grainger at all. I mentioned a lot of other**
 14 **names that popped up all the way through.**
 15 **David Totton's antecedents if you like, to do with the**
 16 **robbery.**
 17 Q. Yes, we can see lots of other names there. The reason
 18 for asking is that when the firearms officers were
 19 briefed the next day, three people were identified as
 20 subjects --
 21 **A. Yes.**
 22 Q. -- of the operation, and one of them had become
 23 Anthony Grainger.
 24 **A. Right.**
 25 Q. I am trying to work out how that happened.

Page 85

1 **A. I don't know.**
 2 Q. Then that PowerPoint was recycled time and time and time
 3 again and was used on the morning of the 3rd, on the day
 4 on which he died.
 5 **A. Again, I can't answer that.**
 6 Q. Was there anything that you said to Mr Ellison that
 7 would suggest, "We need to put Anthony Grainger at the
 8 centre of this operation alongside David Totton"?
 9 **A. No. I did mention him as an associate on a number of**
 10 **occasions through my briefing but, again, I haven't got**
 11 **the power to make people subjects and he hadn't been**
 12 **identified at that point.**
 13 Q. Was the effect of what you were saying, even though you
 14 lacked that power, that Mr Grainger should be regarded
 15 as a subject of this operation?
 16 **A. Again, that is not something I can answer.**
 17 Q. No, but was effect of what you were saying to say --
 18 **A. It was about Totton, so, again, that's a hypothetical**
 19 **question.**
 20 Q. You didn't say anything --
 21 **A. I didn't say make Anthony Grainger a subject, no.**
 22 Q. -- that could cause anyone reasonably to react, to say,
 23 "Let's make Anthony Grainger a subject"?
 24 **A. Again, that is hypothetical and not a question I can**
 25 **answer.**

Page 86

1 Q. Well it is a question you can answer, because you were
 2 there and you were speaking.
 3 **A. Yes, I mentioned Anthony Grainger but in relation to**
 4 **David Totton. I mentioned quite a lot of other names.**
 5 Q. Try and help the chairman if you can, was there anything
 6 that you said that could reasonably be interpreted as
 7 meaning, "You need to make Anthony Grainger a subject of
 8 this operation"?
 9 **A. Again, that was not my meaning, so I can't interpret it**
 10 **any way.**
 11 Q. That was not your intention?
 12 **A. That not my intention.**
 13 Q. Did you say any words --
 14 **A. You -- small --**
 15 THE CHAIRMAN: Just let the question finish.
 16 MR BEER: Did you say any words that could be interpreted
 17 that way --
 18 **A. Again --**
 19 Q. -- or was he just one of a number of names that happened
 20 to get mentioned?
 21 **A. A number of names that happened to get mentioned --**
 22 Q. Thank you.
 23 **A. -- that constantly pop up through the antecedent**
 24 **history, as my statement outlined.**
 25 Q. You have added a rider on the end there.

Page 87

1 **A. No, well, it is in my statement, isn't it? That his**
 2 **names are -- but it is a number of names that have**
 3 **popped up when I have had dealings with Totton and the**
 4 **briefing I was giving.**
 5 Q. It might be thought for a member of the public standing
 6 outside to say, "Well look there are these names that
 7 keep popping up" is maybe not the way that police
 8 officers communicate intelligence to each other.
 9 Is that what you did, you just said, "Look there are
 10 a number of names in this OCG that just keep popping up
 11 over history, you have got Vulture, you have got Botany,
 12 you have got Ascot. The names are there, boss". And
 13 left him to it?
 14 **A. No, no.**
 15 Q. What did you --
 16 **A. I have give the evidence of the briefing I give and the**
 17 **chronology behind it. At no point did I say make anyone**
 18 **a subject. Because there was only David Totton that we**
 19 **had seen get out of the car at that point on that**
 20 **evening.**
 21 Q. Thank you.
 22 **A. No problem.**
 23 Q. Can we look, please, at -- lastly on this subject --
 24 your witness statement at tab 6. Against Mr Ellison's
 25 note at tab 15, page 2321. It is really the second page

Page 88

<p>1 of your witness statement that I am concerned with. 2 If we just look at Mr Ellison's note below the big 3 black line, the first piece of intelligence he has 4 written down is: 5 "SOG intel of Totton and [that says 'Tansey' under 6 there] being chased into a property in Lower Broughton 7 in 1998 and found close to hidden pump action shotgun. 8 Not prosecuted, despite neighbours knowing males at the 9 address." 10 Yes? 11 A. Yes. 12 Q. You have said that you told him, if you look at your 13 witness statement, was the arrest of Totton in 1999: 14 "... during this incident a stolen motor vehicle was 15 pursued in the Salford area. The vehicle was abandoned 16 and two males ran into a house." 17 A. Yes. 18 Q. I mean, apart from a year in difference in dates, that 19 is broadly the same? 20 A. Yes. 21 Q. "On police entry to the house, Totton and another 22 associate called Lee Tansey were arrested together with 23 the house occupants." 24 A. Yes. 25 Q. "... found concealed behind the furniture was a bag</p> <p style="text-align: center;">Page 89</p>	<p>1 If we look at the third page of your witness 2 statement, you say: 3 "The fourth incident that I mentioned was Operation 4 Ascot, which commenced in 2005, that showed Totton 5 associating with males including Anthony Grainger. 6 During this investigation Totton was seen involved in 7 reconnoitre activity in relation to a robbery using 8 three stolen motor vehicles, as well meeting with 9 various other members of the OCG. This resulted in four 10 members of the OCG, Cullen, Anderson, McLennan and 11 McLennan being arrested while committing a robbery in 12 April 2006, on their arrest a firearm was discharged at 13 police officers." 14 Did you say to Mr Ellison that Mr Totton was not 15 prosecuted? 16 A. Yes. 17 Q. Did you say that firearms were used? 18 A. Yes. 19 Q. Who did you say they were used by? 20 A. The McLennans. 21 Q. The third thing that Mr Ellison has written down is that 22 you told him that Operation Botany, or in Operation 23 Botany in 2002 Totton was implicated in the kidnap of 24 a male with a firearm but not prosecuted. 25 A. Yes.</p> <p style="text-align: center;">Page 91</p>
<p>1 containing a shotgun and balaclavas, both offenders were 2 arrested for conspiracy to commit robbery. Totton was 3 charged with this offence however never convicted." 4 A. Yes. 5 Q. Mr Ellison has you written down as saying that Mr Totton 6 was not prosecuted. 7 A. I can't answer that, the difference in that. 8 Q. Did you -- 9 A. I know. 10 Q. Did you tell him that Mr Totton was prosecuted? 11 A. He was not convicted, I told him. 12 Q. Did you -- 13 A. I don't recall. I know he was not convicted of the 14 offence. But I can't recall if I told him prosecuted or 15 convicted. He definitely was charged. 16 Q. Okay. 17 The second thing Mr Ellison has got written down 18 that you told him was Operation Ascot in 2005. 19 A. Yes. 20 Q. "Investigated a robbery of banks in Culcheth and 21 Blackpool areas, Totton believed by the serious 22 organised crime group to be involved in planning and 23 recce of both premises, without actually committing the 24 offence. Two associates received 12-year sentences. 25 Totton not prosecuted. Firearms used."</p> <p style="text-align: center;">Page 90</p>	<p>1 Q. I think that is the third incident that you mentioned 2 further up on the page. 3 A. Yes. 4 Q. "An investigation into a series of robberies that 5 occurred, the MO being staff members', of financial 6 institutions, family members were kidnapped using 7 firearms in order to gain access to the vaults. Three 8 close associates of Totton were arrested, only Parkinson 9 was convicted. Cullen acquitted after trial." 10 Did you tell him that Totton was not prosecuted? 11 A. Yes. 12 Q. What did you tell him about how he was implicated? 13 A. Operation Botany evolved after the conviction of 14 Iain Parkinson, Operation Botany evolved into Operation 15 Ascot eventually and then Totton started to appear in 16 Operation Ascot along with David Cullen, as 17 David Cullen's main associate and carried on criminal 18 activity with him. 19 Q. Operation Adequate, fourthly, Mr Ellison says that you 20 told -- or noted that you told him that: 21 "In 2010 Totton was observed picking up a car with 22 another male and observing staff leaving the premises. 23 SOG intelligence suggests they were planning a kidnap." 24 Is that the long and the short of what you told him? 25 A. It was a stolen motor vehicle he was picking up, which</p> <p style="text-align: center;">Page 92</p>

1 **I did tell him and they were going into the area of the**
 2 **bank at closing time and watching staff leave, but the**
 3 **significance again behind that was Mark Azzopardi was**
 4 **with him on two occasions, who was the original target**
 5 **of Operation Botany.**
 6 Q. Can I turn to 3 March, please. You can put those
 7 bundles away.
 8 THE CHAIRMAN: Have all the pages that have been taken out
 9 put back?
 10 Perhaps, Mrs Shaw, you could check that. Thank you.
 11 MR BEER: Could you look in your binder, please, at tab 2.
 12 There should be a witness statement dated
 13 13 March 2012 --
 14 **A. Yes.**
 15 Q. -- about events on 3 March 2012.
 16 **A. That's correct, yes.**
 17 Q. Ie some observations that you conducted?
 18 **A. That's correct.**
 19 Q. Did you make any notes of the observations that you
 20 conducted?
 21 **A. They were recorded in my observation log.**
 22 Q. Is that where you got the times and details for this
 23 statement?
 24 **A. Yes.**
 25 Q. You say, I think, that at 6.29, about five paragraphs

Page 93

1 in, on 3 March you observed a black motor vehicle
 2 driving from Sandringham Road, this is in Boothtown,
 3 towards the stolen red Audi?
 4 **A. Yes, that's correct.**
 5 Q. The vehicle pulled on to the side of the road opposite
 6 the Audi out of your view and the lights were turned off
 7 the vehicle; is that right?
 8 **A. That's correct, yes.**
 9 Q. The vehicle went out of view but then you saw three
 10 males walking from where it had gone, is that --
 11 **A. Where it had parked out of view, that's correct.**
 12 Q. Those three males walked towards the red Audi?
 13 **A. That's correct, yes.**
 14 Q. You recognised two of them, is that right, Mr Grainger,
 15 the driver, and Mr Totton who was to be the front seat
 16 passenger?
 17 **A. That's correct, yes.**
 18 Q. An unknown third man got into the rear passenger seat
 19 behind Mr Grainger --
 20 **A. That's correct.**
 21 Q. -- behind the driver's side?
 22 **A. Yes.**
 23 Q. You say, a paragraph on, that all three were wearing
 24 sports type clothing. Was that just an observation of
 25 what they were wearing, rather than anything significant

Page 94

1 about it?
 2 **A. Yes, that's correct, nondescript.**
 3 Q. Nondescript clothing, but nothing suspicious about what
 4 they were wearing?
 5 **A. Other than Anthony Grainger was wearing gloves.**
 6 Q. I am going to come to the gloves in a moment, but the
 7 clothing other than the gloves, there wasn't anything
 8 particularly suspicious about that that you noted?
 9 **A. No.**
 10 Q. Okay.
 11 You say that Anthony Grainger was wearing gloves.
 12 Is it right that not Mr Totton, as far as you could see,
 13 was wearing gloves.
 14 **A. I only saw Anthony Grainger wearing gloves. That is all**
 15 **I could comment on.**
 16 Q. If you had seen Mr Totton wearing gloves you would have
 17 said so?
 18 **A. I would have, yes.**
 19 Q. And the unknown male, if you had seen him wearing
 20 gloves, you would have said so?
 21 **A. Yes.**
 22 Q. On your observations it is only one male wearing gloves,
 23 that was Mr Grainger?
 24 **A. That I could see, yes.**
 25 Q. Can we look, please -- these are the last couple of

Page 95

1 questions that I am going to ask -- at K/1249, please.
 2 **A. 1124?**
 3 Q. No, 1249.
 4 THE CHAIRMAN: 1249.
 5 **A. 1249.**
 6 MR BEER: Do you have 1249?
 7 **A. Yes, page 31 on the top.**
 8 Q. If you just flick back a page you can see this is
 9 an entry for 3 March 2012. This is part of DI Cousen's
 10 casebook?
 11 **A. Yes.**
 12 Q. On page 31 of the book he has recorded, and he has told
 13 us that this is as a result of your broadcast.
 14 **A. Yes.**
 15 Q. "Totton, Grainger and one unknown male in stolen Audi,
 16 all wearing gloves."
 17 Did you tell him that they were all wearing gloves?
 18 **A. Not to my knowledge, no.**
 19 Q. Can we look, please, at F/425.
 20 Do you have that?
 21 **A. Page?**
 22 Q. 425, please.
 23 **A. Is that the right one?**
 24 THE CHAIRMAN: It is in the back. It will be near the back
 25 of the file you are being handed now.

Page 96

<p>1 A. Yes, okay.</p> <p>2 MR BEER: This is part of Mr Granby, the silver firearms</p> <p>3 commander's log. At 18.27, the last entry on the page:</p> <p>4 "VW stopped near Audi. Observation post monitoring</p> <p>5 Audi. Three on board. Grainger driver, Totton front</p> <p>6 seat, unknown in rear."</p> <p>7 That is all consistent with what you have said?</p> <p>8 A. Yes.</p> <p>9 Q. All in jogging suits. Broadly what you said, "sports</p> <p>10 clothing", I think?</p> <p>11 A. Yes.</p> <p>12 Q. "No one apparently carrying anything."</p> <p>13 And I will come back to that in a second:</p> <p>14 "Thinks all wearing gloves."</p> <p>15 Can you see that?</p> <p>16 A. Yes.</p> <p>17 Q. Mr Granby has you, I think, saying that you thought they</p> <p>18 were all wearing gloves.</p> <p>19 A. No, I just saw Anthony Grainger wearing gloves.</p> <p>20 Q. Did you broadcast that no one was apparently carrying</p> <p>21 anything?</p> <p>22 A. I don't recall, but if they were I would have put it</p> <p>23 over the air that was part of the observations but to</p> <p>24 say I recall not saying, "No one is carrying</p> <p>25 anything ..."</p> <p style="text-align: center;">Page 97</p>	<p>1 MR STRAW: Thank you, sir.</p> <p>2 Questions from MR STRAW</p> <p>3 MR STRAW: DC Clark, I am Adam Straw and I represent</p> <p>4 Anthony's mother, stepfather and brother.</p> <p>5 A. Good afternoon.</p> <p>6 Q. Just two very short areas.</p> <p>7 Mr Beer asked you about item 41 of the intelligence</p> <p>8 chronology and in particular the second sentence of it</p> <p>9 that says:</p> <p>10 "I, David Totton is planning to commit offences of</p> <p>11 robbery with his close friend Idgy and others, including</p> <p>12 Anthony Grainger and twin brothers known as Aaron and</p> <p>13 Bradley."</p> <p>14 Do you remember that line from the intelligence</p> <p>15 chronology?</p> <p>16 A. Yes.</p> <p>17 Q. When he was asking you questions about that, I think you</p> <p>18 said Idgy didn't come into it. Is that right?</p> <p>19 A. On observations, no, he didn't. Yes, that's correct.</p> <p>20 Q. Could you explain that in a bit more detail, please?</p> <p>21 A. In what sense? He was never seen on the surveillance</p> <p>22 and then, when I did the phones investigation later on,</p> <p>23 I did find a number for Idge.</p> <p>24 Q. Okay, but he didn't come into it in the sense that he</p> <p>25 was not seen on any surveillance or any other evidence</p> <p style="text-align: center;">Page 99</p>
<p>1 Q. If they had been carrying it, you would have said</p> <p>2 something?</p> <p>3 A. Yes.</p> <p>4 Q. But you don't remember one way or the other --</p> <p>5 A. Whether I said it or not.</p> <p>6 Q. -- whether you made the positive comment, "No one is</p> <p>7 carrying anything"?</p> <p>8 A. That's correct.</p> <p>9 MR BEER: Thank you.</p> <p>10 They are the questions that I ask, sir.</p> <p>11 THE CHAIRMAN: Does anybody else have questions, if so we</p> <p>12 will break off at this point I think, it is already</p> <p>13 1.05.</p> <p>14 MR STRAW: Sir, if I may I would hopefully be no longer than</p> <p>15 a minute.</p> <p>16 THE CHAIRMAN: Ms Whyte?</p> <p>17 MS WHYTE: Yes, just a few.</p> <p>18 THE CHAIRMAN: Would you rather we carried on?</p> <p>19 MS WHYTE: No, I would rather we broke.</p> <p>20 THE CHAIRMAN: Okay, all right, certainly.</p> <p>21 We will break off then.</p> <p>22 (1.05 pm)</p> <p>23 (The Luncheon Adjournment)</p> <p>24 (2.10 pm)</p> <p>25 THE CHAIRMAN: Yes, Mr Straw.</p> <p style="text-align: center;">Page 98</p>	<p>1 during that period before Anthony Grainger's shooting?</p> <p>2 A. To my knowledge, yes.</p> <p>3 Q. Okay.</p> <p>4 Was that another reason which suggested that that</p> <p>5 piece of information may not be reliable?</p> <p>6 A. Reliable? Its reliability is not down to me.</p> <p>7 Q. What I mean by that is, it says, "David Totton is</p> <p>8 planning to commit offences of robbery with Idgy,</p> <p>9 Anthony Grainger and others".</p> <p>10 Your observations or the surveillance observations</p> <p>11 are that Idgy wasn't involved at that stage. Doesn't</p> <p>12 that suggest the intelligence is not completely</p> <p>13 reliable?</p> <p>14 A. Again, without arguing about it, the other part of it</p> <p>15 that Anthony Grainger was upheld by the surveillance,</p> <p>16 but Idgy didn't come into it -- sorry Iain Parkinson</p> <p>17 didn't come into it, so the reliability side of it is</p> <p>18 either or at that point.</p> <p>19 Q. Okay.</p> <p>20 The only other issue, from the time when you first</p> <p>21 were involved in Operation Shire, so back</p> <p>22 in October 2011, I think.</p> <p>23 A. That's right.</p> <p>24 Q. Up until Anthony Grainger's shooting on 3 March 2012,</p> <p>25 were you largely working on Operation Shire?</p> <p style="text-align: center;">Page 100</p>

<p>1 A. Amongst other operations, which I can't quote off the 2 top of my head but we do jump between operations, but 3 I was involved in the core team, yes. 4 Q. How much of your time was spent roughly on 5 Operation Shire? 6 A. I couldn't give you that estimate, I am sorry. 7 Q. Can you give us a ballpark, so the majority, a tiny 8 amount, something like that? 9 A. Not a tiny amount, not all the time. A lot of the time 10 I would go with, yes. 11 MR STRAW: Thank you. 12 A. Thank you. 13 Questions from MR WEATHERBY 14 MR WEATHERBY: Can I just pick up on that last point, how 15 long you were spending on Shire. 16 A. Yes, certainly. 17 Sorry, sir, who are you representing? 18 Q. My name is Pete Weatherby and I represent the partner of 19 Anthony. 20 A. All right, sorry, thank you. 21 Q. It was my fault, not yours. 22 A. No problem. 23 Q. You were telling us that you spent a significant time on 24 Shire, is that a fair way of putting it? 25 A. A lot of the time, yes.</p> <p style="text-align: center;">Page 101</p>	<p>1 MR WEATHERBY: It is page 39, please. The top right hand, 2 it is the actual casebook number, yes? 3 A. Yes. 4 Q. Halfway down, that is your note of 25 January, yes? 5 A. Yes. 6 Q. Can you help me, it is not entirely clear to me but 7 there doesn't appear to be any note of briefing 8 Mr Ellison, does there? 9 A. No. 10 Q. It is not just that you haven't recorded what you 11 briefed, it is the fact you have not recorded that you 12 briefed him. 13 A. Recorded anything. 14 Q. Why is that? 15 A. No reason particularly. I was caught on the hop going 16 in there but -- 17 Q. I appreciate that you were not given any advanced notice 18 of it, but when you came out of the briefing, or even in 19 the briefing, why didn't you make a note that you had 20 briefed a silver cadre on a potential firearms 21 deployment? 22 A. I don't know, sir. 23 Q. You don't know? 24 A. I don't know, sir. 25 Q. Do you think you should have done?</p> <p style="text-align: center;">Page 103</p>
<p>1 Q. A lot of the time? 2 A. Yes. 3 Q. On the 25th, you have given a lot of evidence that you 4 were called into this briefing with Mr Ellison, yes? 5 A. That's correct, yes. 6 Q. Between the 25th and 17 February -- 7 A. Yes. 8 Q. -- can you tell us what you did on Shire? 9 A. What, every day or just -- 10 Q. Yes. 11 A. No, sir. 12 Q. No? Can you tell us anything that you did? 13 A. Not without records with any accuracy, sir. 14 Q. Do you recall what you did the following day, the 26th? 15 A. The 26th? Yes, I was in an observation post. 16 Q. You were in an observation post? 17 A. Yes, from 5.30 in the morning till at least 7.00 in the 18 evening. 19 Q. Can I ask you to look at your casebook, please. It is 20 in the red folder I think behind you. 21 A. Yes. 22 Q. I don't think this has a bundle reference; it was served 23 in the last 24 hours. 24 Do you have it, sir? 25 THE CHAIRMAN: Yes, I have.</p> <p style="text-align: center;">Page 102</p>	<p>1 A. I think when it comes to a public Inquiry, with 2 hindsight, yes. 3 Q. Just over the next couple of pages, the next two pages, 4 just to jog your memory, no entry of 26 January? 5 A. No. 6 Q. No entry about the observation post you have just told 7 me about? 8 A. No, but the observations are recorded in my log for that 9 day. 10 Q. In your log? 11 A. Yes, the start time, the end time and everything that 12 I have done in between. 13 Q. Right. So I am sure I will be corrected if I am wrong 14 but I don't think we have that. 15 A. The observation log? You certainly should have the 16 observation log. 17 Q. Okay. But other than the observation post on the 26th, 18 what did you do in respect of Shire? 19 A. Again, I don't recall. I certainly recovered Anthony's 20 car after the event, and that is recorded on a FWIN. 21 Q. Then between 26th and 17 February, on the evidence you 22 have given so far, it would appear that you have done 23 quite a lot on Shire? 24 A. Yes. 25 Q. Nothing recorded?</p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

<p>1 A. Again, I was, like I said, I was the phones officer 2 which is all recorded on applications that we put in. 3 I was looking at handsets, again that is applications 4 and electronic paperwork. 5 Q. Yes, so you had put in an application for authorisation 6 to look at phones? 7 A. Yes. 8 Q. Why not record that in your log, you certainly do record 9 material about phones at other times, don't you -- 10 A. Yes. 11 Q. -- 17 February? 12 A. Yes, yes, that's correct. 13 Q. Why not between 25th and 17th? 14 A. Again, I don't know, sir, without checking. 15 Q. You then have an entry on 17 February. 16 A. Can you just give me a page number for that? 17 Q. Yes, it is two pages on, there is a blank page or a page 18 that you put a line through -- 19 A. Yes. 20 Q. -- page 40 and then page 41, so that is 17 February. 21 A. Yes. 22 Q. Yes? 23 Then after that, your next entry is page 43, 24 6 March. 25 A. Yes.</p> <p style="text-align: center;">Page 105</p>	<p>1 question a bit more carefully. 2 I am referring back to what Mr Beer was asking you 3 and I want to put the context to the question that I am 4 about to ask you, I want to take it one step further 5 than Mr Beer did. 6 A. Okay. 7 Q. He was asking you about the fact that you had given your 8 briefing to Mr Ellison on the 25th? 9 A. Yes. 10 Q. Then on the 26th, the TFU briefing had 11 Mr Anthony Grainger as subject number 3, yes? 12 A. Yes. 13 Q. You told Mr Beer that you didn't know how that had 14 occurred, yes? 15 A. No, I don't. 16 Q. We heard some evidence earlier from a Mr Evans, who was 17 one of the DSU officers. 18 A. Yes. 19 Q. I am just going to read out a very short passage. 20 I am not going to ask you to turn to it, sir, you 21 may not have it in front of you. 22 THE CHAIRMAN: I don't. 23 MR WEATHERBY: May I just give you the reference. It is 24 evidence from 8 February, Day 14, and it is page 127. 25 THE CHAIRMAN: Thank you.</p> <p style="text-align: center;">Page 107</p>
<p>1 Q. Absolutely nothing recorded about Operation Shire 2 between 17 February and 6 March? 3 A. Yes, again, it could be I could have been doing other 4 jobs, I can't answer that question why nothing is 5 recorded. 6 Q. We know from earlier evidence you have given that on 7 3 March you were on an observation post -- 8 A. Yes. 9 Q. -- presumably there will be a log for that? 10 A. Yes, there is. 11 Q. Anything else on 3 March that you did? 12 A. Not that I can recall. 13 Q. No. 14 Okay, one more point from me then. Mr Beer was 15 asking you about the TFU briefing on 26 January, do you 16 recall, before lunch. He was saying that Mr Grainger, 17 Anthony Grainger, had become subject 3. 18 A. Yes. 19 THE CHAIRMAN: You are talking now about -- you are not 20 talking about the briefing -- you are talking about the 21 briefing on the -- 22 MR WEATHERBY: On the 26th. 23 THE CHAIRMAN: Of the authorised firearms officers, not the 24 silver briefing? 25 MR WEATHERBY: Indeed, yes. Sorry, I should explain my</p> <p style="text-align: center;">Page 106</p>	<p>1 MR WEATHERBY: Mr Evans's statement was put to him by 2 Mr Beer and the question was: 3 "Can I turn then to some observations that you 4 conducted ..." 5 Mr Evans was one of the DSU officers? 6 A. Yes, I am aware of him. 7 Q. "Was the first one of relevance on 26 January?" 8 If you just look at your statement -- 9 A. Could you just bear with me a second? 10 THE CHAIRMAN: You are reading from the transcript? 11 MR WEATHERBY: I am, I am not referring to a document I am 12 just explaining the question here. 13 A. All right, sorry. 14 Q. Mr Beer referred him to a statement about 26 January -- 15 A. Yes. 16 Q. -- and he refers to 4.00 in the morning, so he is 17 referring to a DSU briefing. 18 A. Yes. 19 Q. Yes? 20 A. Yes. 21 Q. Mr Evans says: 22 "I was shown a photograph and DC Leach identified 23 Anthony Grainger, who was referred to as 'Subject 24 Gloucester', Yes." 25 On 26 January?</p> <p style="text-align: center;">Page 108</p>

<p>1 A. Right.</p> <p>2 Q. Do you understand what I am asking you, Mr Beer has</p> <p>3 asked you about the subsequent briefing of the firearms</p> <p>4 officers --</p> <p>5 A. Yes.</p> <p>6 Q. -- and how it got to the firearms officers that</p> <p>7 Mr Grainger was a subject. I am taking that one step</p> <p>8 further. Do you have any knowledge of how it came to</p> <p>9 pass that the DSU officers were shown Mr Grainger's</p> <p>10 picture --</p> <p>11 A. No, I don't. Sorry.</p> <p>12 Q. -- presumably as a subject?</p> <p>13 A. No, I don't. I am sorry.</p> <p>14 Q. You don't?</p> <p>15 A. Again, it is prepared separately.</p> <p>16 Q. Yes. Who is DC Leach, do you know?</p> <p>17 A. He is the researcher in the DSU office.</p> <p>18 Q. It is right though, isn't it, that Mr Ellison would</p> <p>19 transfer knowledge that he has gained from briefings</p> <p>20 into the firearms briefing.</p> <p>21 A. Again, hypothetically, but that is not in my range of</p> <p>22 knowledge of what was --</p> <p>23 Q. Fair enough. It is actually the robbery squad that</p> <p>24 would be responsible for briefing the DSU?</p> <p>25 A. Again, theoretically, but like I said I can't help you</p> <p style="text-align: center;">Page 109</p>	<p>1 Q. Can you help, first of all, with the material on which</p> <p>2 you based this statement?</p> <p>3 A. Yes, it was speaking to officers involved and sight of</p> <p>4 the MG5, at some point. I don't exactly, can't time and</p> <p>5 date who I have spoke to and when.</p> <p>6 Q. I am interrupting already.</p> <p>7 Somebody had set you the job of amplifying your</p> <p>8 knowledge of Operation Vulture?</p> <p>9 A. Yes.</p> <p>10 Q. You were able to identify the original investigating</p> <p>11 officers?</p> <p>12 A. Yes.</p> <p>13 Q. And you were able to locate the MG5?</p> <p>14 A. At some point I have read the MG5, even before this</p> <p>15 point.</p> <p>16 Q. When did your role in Operation Vulture end?</p> <p>17 A. I was never involved in Operation Vulture.</p> <p>18 Q. Were you present at trial --</p> <p>19 A. No.</p> <p>20 Q. -- when the trial judge ruled effectively in relation to</p> <p>21 some of the defendants --</p> <p>22 A. No, that is passed on knowledge.</p> <p>23 Q. -- that they should be directed acquittals?</p> <p>24 Looking at your statement, however, you have set out</p> <p>25 that it was a proactive operation involving the five</p> <p style="text-align: center;">Page 111</p>
<p>1 with how or when or who has.</p> <p>2 Q. Yes, there would be no one else who would be briefing</p> <p>3 the DSU?</p> <p>4 A. I don't know, sir, I can't answer that question.</p> <p>5 MR WEATHERBY: I will not take it any further then. Thank</p> <p>6 you very much.</p> <p>7 THE CHAIRMAN: Mr Davies?</p> <p>8 MR DAVIES: Yes, sir.</p> <p>9 Questions from MR DAVIES</p> <p>10 MR DAVIES: DC Clark, I am asking questions on behalf of Q9,</p> <p>11 who was the firearms officer who shot Mr Grainger.</p> <p>12 Three areas, the first is Operation Vulture.</p> <p>13 A. Yes.</p> <p>14 Q. I think in your bundle it is tab 8. It is our</p> <p>15 electronic file E/373, or a better copy at E/264, your</p> <p>16 tab 8 I think. It should be a statement of</p> <p>17 30 September.</p> <p>18 Tab 7 is a better copy.</p> <p>19 Thank you, Ms Whyte.</p> <p>20 A. Yes, thank you.</p> <p>21 Q. This is one of a series of statements you made.</p> <p>22 A. Yes.</p> <p>23 Q. This one appears to be directed specifically at your</p> <p>24 knowledge in relation to Operation Vulture?</p> <p>25 A. That's correct, yes.</p> <p style="text-align: center;">Page 110</p>	<p>1 charged persons being subject to surveillance over</p> <p>2 an extended period of time.</p> <p>3 A. Yes, that's correct.</p> <p>4 Q. Is that a proactive operation by the robbery squad?</p> <p>5 A. Yes.</p> <p>6 Q. Looking at the names that were the subjects of that</p> <p>7 operation, Messrs Ellis, Totton, Anderson and the</p> <p>8 Grainger brothers, from your immersion in organised</p> <p>9 crime groups and robbery in the Salford area, are these</p> <p>10 names that are associated with that level of</p> <p>11 criminality?</p> <p>12 A. Yes, through the series of events I outlined to</p> <p>13 Mr Ellison, yes.</p> <p>14 Q. Yes. Again, there is reference elsewhere in the context</p> <p>15 of this Inquiry to people such as the Corkovics, various</p> <p>16 members of that family.</p> <p>17 A. Yes.</p> <p>18 Q. Again, they are -- just as a matter of policing</p> <p>19 knowledge and intelligence -- people believed, on</p> <p>20 occasion proved, to be engaged in this level of</p> <p>21 criminality?</p> <p>22 A. Yes, I have worked on jobs with the Corkovics.</p> <p>23 Q. Which, lest we forget, involves ordinary people being</p> <p>24 held up at gunpoint, terrified, and commercial</p> <p>25 quantities of cash taken?</p> <p style="text-align: center;">Page 112</p>

<p>1 A. That's correct, that is robbery in essence, yes.</p> <p>2 Q. The effect on those ordinary members of the public can</p> <p>3 vary but there are occasions when they simply cannot go</p> <p>4 back to work?</p> <p>5 A. Again, I would imagine that is the case, yes.</p> <p>6 Q. Within Salford, based on your knowledge, you are</p> <p>7 constantly no doubt trying to assess the patterns of</p> <p>8 association between different members of these crime</p> <p>9 groups?</p> <p>10 A. That's correct, yes.</p> <p>11 Q. Indeed, on occasion they will overlap?</p> <p>12 A. Yes. To a certain extent, yes.</p> <p>13 Q. In terms of your statement, Operation Vulture and</p> <p>14 Anthony Grainger, you have sought to summarise the</p> <p>15 evidence specifically against Anthony Grainger in your</p> <p>16 statement. It is about halfway down the first page.</p> <p>17 It needn't be read out verbatim, but in summary,</p> <p>18 over the period of what looks like a sustained proactive</p> <p>19 operation, as you have put it:</p> <p>20 "Was seen to be a constant associate of the other</p> <p>21 co-accused involved in the conspiracy to commit</p> <p>22 robbery."</p> <p>23 Yes?</p> <p>24 A. That's correct, yes.</p> <p>25 Q. "He was seen to carry out reconnaissance on the bank</p> <p style="text-align: center;">Page 113</p>	<p>1 Q. It is physical evidence of association with banknotes</p> <p>2 that had been stolen --</p> <p>3 A. By means of robbery.</p> <p>4 Q. -- in a robbery ten days before?</p> <p>5 A. Yes.</p> <p>6 Q. Do you know if he ever explained that?</p> <p>7 A. Say again?</p> <p>8 Q. Do you know if Mr Grainger ever explained that?</p> <p>9 A. I couldn't tell you that part.</p> <p>10 Q. The second specific robbery that was reflected in this</p> <p>11 proactive operation was the one in Salford at the</p> <p>12 Adelphi Post Office --</p> <p>13 A. That's correct, yes.</p> <p>14 Q. -- on 10 June.</p> <p>15 A. Yes.</p> <p>16 Q. You have set out that on the day of that robbery,</p> <p>17 Anthony Grainger, David Totton, Peter Anderson and</p> <p>18 Stuart Ellis were seen to leave Mr Totton's address in</p> <p>19 a private hire vehicle that travelled to the area of the</p> <p>20 Post Office.</p> <p>21 A. Yes.</p> <p>22 Q. They then all got out and walked into a walkway or</p> <p>23 alleyway?</p> <p>24 A. That's correct, yes.</p> <p>25 Q. A very short time later, the robbery occurred at the</p> <p style="text-align: center;">Page 115</p>
<p>1 that was subject to an armed robbery on 31 May 1996, the</p> <p>2 Royal Bank of Scotland in Prestwich."</p> <p>3 A. Yes.</p> <p>4 Q. In the currency of that particular armed robbery,</p> <p>5 a shotgun and sledgehammer were used to threaten the</p> <p>6 staff?</p> <p>7 A. That's correct, yes.</p> <p>8 Q. Immediately prior to the actual robbery, your point 3,</p> <p>9 he was seen in the area in company with the co-accused.</p> <p>10 A. Yes.</p> <p>11 Q. He, not being of course a resident of Prestwich?</p> <p>12 A. Yes.</p> <p>13 Q. And nor were they?</p> <p>14 A. No.</p> <p>15 Q. On his subsequent arrest, 10 June, so something like 10</p> <p>16 days later --</p> <p>17 A. Yes.</p> <p>18 Q. -- he was found in possession of a quantity of cash</p> <p>19 from that robbery, because of the sequential numbers of</p> <p>20 the banknotes?</p> <p>21 A. Yes, that's correct, yes.</p> <p>22 Q. Pausing there, being in possession of sequential</p> <p>23 banknotes in the context of the surveillance identified</p> <p>24 has nothing to do with the surveillance, has it?</p> <p>25 A. It is actual physical evidence.</p> <p style="text-align: center;">Page 114</p>	<p>1 nearby Post Office, staff were threatened with a handgun</p> <p>2 and an axe to steal money and an area search was</p> <p>3 completed for the offenders, Stuart Ellis being seen to</p> <p>4 enter a nearby address."</p> <p>5 A. That's correct, yes.</p> <p>6 Q. Again, that address was searched and found in the</p> <p>7 address was a bag containing a firearm, two masks and</p> <p>8 the cash from the Adelphi Post Office robbery?</p> <p>9 A. That's correct, yes.</p> <p>10 Q. The robbery takes place, Ellis is chased to a nearby</p> <p>11 address and from within it the necessary equipment used</p> <p>12 in the robbery was recovered?</p> <p>13 A. That's correct, yes.</p> <p>14 Q. That is not surveillance either, is it?</p> <p>15 A. Well, he was surveyed to the address and then the</p> <p>16 physical recovery is evidence, yes.</p> <p>17 Q. All in a period of time that is apparently very short?</p> <p>18 A. Yes.</p> <p>19 Q. Four men, having arrived together in the same private</p> <p>20 hire vehicle?</p> <p>21 A. Yes, correct.</p> <p>22 Q. They were subsequently charged and the mechanics of how</p> <p>23 the indictment played out have been rehearsed through</p> <p>24 Mr Beer?</p> <p>25 A. That's correct, yes.</p> <p style="text-align: center;">Page 116</p>

<p>1 Q. All we know is your statement here, Mr Clark, that: 2 "After the prosecution case was put forward, 3 two weeks into the trial, the evidence was reviewed by 4 the judge who subsequently made the decision to dismiss 5 the charges due to inconsistencies in the surveillance 6 evidence." 7 A. That's correct, yes. 8 Q. It was left on the file against Stuart Grainger and 9 directed acquittals in relation to the others? 10 A. Yes. 11 Q. Given the physical evidence and quality of the 12 surveillance you have summarised, that may be thought to 13 be a surprising outcome, do you agree? 14 A. Yes, again, I do agree. 15 THE CHAIRMAN: What is the point of that question? 16 MR DAVIES: Do you have access to -- 17 THE CHAIRMAN: Mr Davies, what was the point of that 18 question? 19 MR DAVIES: Because we have no explanation as to what the 20 detail of the judge's ruling was. That was my next 21 question. 22 A. Again, I can't help you with that, unfortunately. 23 Q. You cannot? 24 A. No. My point being was that a live firearm was 25 recovered after a proactive operation on the strike day</p> <p style="text-align: center;">Page 117</p>	<p>1 bundle P/365 to 368 in the red -- 2 A. But Blythe itself, no, different department completely. 3 Q. Would it be potentially relevant intelligence that cash, 4 body armour, smoke grenades, overalls, balaclavas and 5 masks were recovered from somebody's home address? 6 A. Again, that is not within my knowledge, so I can't 7 comment on -- 8 Q. In principle, looking at organised crime groups. 9 A. In principle, yes. 10 Q. Yes, all right. 11 A. But again it is not in my knowledge, Operation Blythe. 12 Q. The final point is this, it is threat assessment. The 13 briefing firearms officers, including Q9, received, 14 addressed the familiar rubric of ICI, identity, 15 capability and intent. Are those familiar -- 16 A. No, sir, that is not something that we use. 17 Q. No? 18 A. That is firearms terms. 19 Q. Based on your knowledge of Messrs Totton, 20 Anthony Grainger and Robert Rimmer, would you assess 21 their capability at the time as one that involved the 22 capability of using firearms to commit armed robberies? 23 A. Again, I can't comment on Mr Rimmer, because my working 24 knowledge of him is not good enough. In the briefing 25 I give Mr Ellison, I outlined a number of jobs that were</p> <p style="text-align: center;">Page 119</p>
<p>1 or an arrest day. 2 Q. Yes. 3 In terms of how that sort of outcome is handled, 4 Detective, by the police, in court proceedings, how do 5 you treat it in terms of the intelligence picture? 6 A. Like I have just said, these people were together on 7 that particular day. After activity against them people 8 on that particular day, money and a firearm has been 9 recovered and they have been charged on them 10 circumstances. What happens at court, I can't help you 11 with, I do apologise. 12 Q. You continue, necessarily I suggest, to treat it as part 13 of the overall intelligence picture? 14 A. Yes. 15 Q. Next topic is Operation Blythe, do you have any 16 knowledge yourself of Operation Blythe, it was not 17 a robbery squad operation? 18 A. No. 19 Q. None? 20 A. I don't know if it has come up, but the only knowledge 21 I have got during Operation Blythe is I did an ID 22 statement in relation to Anthony Grainger, giving 23 a stolen car to Lee Tansey and Carl Hagan that was 24 subsequently used in an armed robbery in Lancashire. 25 Q. Again, but in terms of -- and the reference here is</p> <p style="text-align: center;">Page 118</p>	<p>1 linked to David Totton, was what the briefing was about, 2 Anthony Grainger was mentioned. Firearms capability 3 within that were mentioned. 4 Q. You would agree that on the picture the police had, 5 however it got into the briefing, whatever pathway was 6 taken to get there -- 7 A. There was relevant information for a firearms authority. 8 Q. -- the correct assessment was they had the capability to 9 use firearms to commit armed robberies? 10 A. Hence the silver authority being issued. 11 Q. Yes. 12 Has anything you have read since altered that 13 capability assessment? 14 A. No. 15 MR DAVIES: Thank you, Detective. 16 THE CHAIRMAN: Ms Whyte? 17 Questions from MS WHYTE 18 MS WHYTE: Thank you. 19 Can we clear up, please, as a matter of procedure 20 an issue about date of the statement, officer. Could 21 you go to tab 5 of the main bundle in front of you. 22 A. Yes, please. 23 Q. Which is a statement which can be found in others' 24 bundles at E/38. If I could ask Mrs Shaw to just 25 provide you with a better printed copy of the same</p> <p style="text-align: center;">Page 120</p>

<p>1 document.</p> <p>2 You have been asked about a report dated</p> <p>3 18 July 2012, which I am going to suggest was in fact</p> <p>4 a report requested by the IPCC, do you know if that is</p> <p>5 right?</p> <p>6 A. I don't recall.</p> <p>7 Q. You don't know?</p> <p>8 A. I couldn't remember.</p> <p>9 Q. If you just have a look at that document I have given</p> <p>10 you, can you see that a typed date has been struck</p> <p>11 through --</p> <p>12 A. Yes.</p> <p>13 Q. -- and a handwritten date of 19 September 2012 has been</p> <p>14 inserted?</p> <p>15 A. Yes, that's correct.</p> <p>16 Q. This statement is signed by you on each page; is that</p> <p>17 correct?</p> <p>18 A. It is, yes.</p> <p>19 Q. Over lunch we have been able to try and track down the</p> <p>20 genesis of these statements and in fact it is clear that</p> <p>21 the IPCC in relation to your report raised an action,</p> <p>22 action 368, which can be found for anyone who wants to</p> <p>23 check in bundle D/774. In relation to your report, the</p> <p>24 action from the IPCC was:</p> <p>25 "Obtain a statement about knowledge of intelligence</p> <p style="text-align: center;">Page 121</p>	<p>1 way down the page that Mr Grainger was seen at</p> <p>2 Mr Anderson's home on 12 April 2006, where he was seen</p> <p>3 with Mr Anderson removing a large holdall and bags from</p> <p>4 a Seat vehicle into Mr Anderson's address. Mr Anderson</p> <p>5 then went on to meet Mr Totton later that day --</p> <p>6 A. Mr Cullen.</p> <p>7 Q. Mr Cullen, I am so sorry, and conducted a reconnaissance</p> <p>8 of the Lloyds TSB at Ashton on Ribble?</p> <p>9 A. That's correct, yes.</p> <p>10 Q. Then if we can skip, please, over the page to page 27,</p> <p>11 to 27 April, the same year, at 8.30 in the morning the</p> <p>12 police were conducting surveillance on a number of</p> <p>13 stolen vehicles, including a stolen Citroen and a stolen</p> <p>14 Vauxhall Vectra. We can see that about lunchtime, so</p> <p>15 1.00, Mr Grainger arrived at Lord Street in the stolen</p> <p>16 Vectra.</p> <p>17 A. It is actually in his legitimate Vectra.</p> <p>18 Q. His own car?</p> <p>19 A. Yes.</p> <p>20 Q. Thank you for clarifying that -- yes, the stolen Vectra</p> <p>21 is silver, you are quite right. He arrived in his own</p> <p>22 car, put on some gloves, this is mid April, and got into</p> <p>23 the stolen Citroen using a key. Other males were seen</p> <p>24 to alight from a car and walk away. Mr Grainger then</p> <p>25 drove off in the Citroen.</p> <p style="text-align: center;">Page 123</p>
<p>1 in relation to subjects' details of involvement in all</p> <p>2 intelligence briefings to staff and firearms</p> <p>3 commanders."</p> <p>4 That request was made on 6 August.</p> <p>5 A. Okay, thank you.</p> <p>6 Q. And was resulted, to use the language of the crown</p> <p>7 prosecutor who filled in the MG6C on 25 September, so it</p> <p>8 does rather look as though the statement that you were</p> <p>9 being asked about is dated actually 19 September,</p> <p>10 whatever other statements might say of an unsigned or</p> <p>11 typed nature.</p> <p>12 A. Okay, thank you.</p> <p>13 I would like to ask you, please about Operation</p> <p>14 Ascot. And to ask you to look at A/26, which Mrs Shaw</p> <p>15 will give you.</p> <p>16 This is statement of an officer called</p> <p>17 John Mulverhill, do you know him?</p> <p>18 A. I do, yes. I have worked with him in the Robbery Unit.</p> <p>19 Q. Thank you. Could you go to page 26, please. He</p> <p>20 provided a statement about Operation Ascot in some</p> <p>21 detail and I would just like to take you to some of that</p> <p>22 detail --</p> <p>23 A. Yes.</p> <p>24 Q. -- relating, as it did, to Mr Grainger, rather than</p> <p>25 necessarily others. Can you see about two-thirds of the</p> <p style="text-align: center;">Page 122</p>	<p>1 A little later, Mr Totton was seen in the Citroen C4</p> <p>2 wearing gloves, possibly some body armour under his top</p> <p>3 and entered the stolen Vectra, which drove off in convoy</p> <p>4 with the Citroen.</p> <p>5 A. That's correct, yes.</p> <p>6 Q. A flatback vehicle seems to have also joined the convoy,</p> <p>7 that was a stolen vehicle?</p> <p>8 A. That's correct.</p> <p>9 Q. Then if we go to the bottom of page 28 on that same day,</p> <p>10 so within the same hour, just before 2.00, the stolen</p> <p>11 Citroen was seen in Golborne with Mr Grainger in the</p> <p>12 driver's seat.</p> <p>13 A. Yes.</p> <p>14 Q. That vehicle was then in convoy with the Vectra and</p> <p>15 Mr Grainger continued to be identified as the driver of</p> <p>16 the Citroen?</p> <p>17 A. That's correct, yes.</p> <p>18 Q. It went to where the Vectra had previously been,</p> <p>19 Mr Grainger got out, he was wearing golfing/driving</p> <p>20 gloves.</p> <p>21 A. That's correct.</p> <p>22 Q. Observations continued. Then, on 28 April, as we know,</p> <p>23 an armed robbery took place at the Lloyds TSB at</p> <p>24 Ashton on Ribble. The premises I think that had</p> <p>25 featured on 12 April. Mr Cullen, Mr Anderson and the</p> <p style="text-align: center;">Page 124</p>

1 McLennans were arrested in respect of that.
 2 **A. That's correct, Mr Anderson was identified the day**
 3 **before as well.**
 4 Q. The Citroen was recovered on that day along with the
 5 other two stolen vehicles; is that right?
 6 **A. That's correct, yes.**
 7 Q. The stolen vehicle, which bore false plates,
 8 I think was -- this is the bottom of page 29 --
 9 forensically searched, and there was a water bottle in
 10 the front containing accelerants?
 11 **A. That's correct.**
 12 Q. Just two very discrete small areas, please.
 13 K/1228, this is not your document, it is Mr Cousen's
 14 notebook.
 15 **A. Right.**
 16 Q. There is probably no need to go to it. I can read it
 17 out, but others do check if they wish.
 18 Mr Cousen has noted on 21 February 2012 that he has
 19 received information from you, DC Clark, that DT and AG,
 20 which we take to be Mr Totton and Mr Anthony Grainger --
 21 **A. Yes.**
 22 Q. -- also visited Ellamsbridge Road, St Helens, where
 23 there is a sub Lloyds TSB branch previously been robbed?
 24 **A. Yes.**
 25 Q. Does that ring any bells with you? Can you explain how

Page 125

1 he came to be writing that as something that came from
 2 you?
 3 **A. Yes. I am originally from St Helens, so it has been in**
 4 **the local paper in the past that it has been the subject**
 5 **of a robbery.**
 6 Q. Yes. How is it that you are passing on the information
 7 about potential suspicious activity, I mean, between
 8 Mr Totton and Mr Grainger to your --
 9 **A. Mr Totton and Mr Grainger had been driving round in the**
 10 **stolen vehicle carrying out a reconnaissance or**
 11 **reconnoitre activity.**
 12 Q. And you reported that back?
 13 **A. I did, yes.**
 14 Q. Finally, please, could I ask you to go to bundle W/373
 15 and this arises out of some questioning that took place
 16 in your absence yesterday of another witness called
 17 Nicola Moore.
 18 **A. Yes.**
 19 **Sorry, what was the page reference?**
 20 Q. It is page 373.
 21 You have emailed her at about 8.45 at night on
 22 4 March, so this is the day after Mr Grainger died --
 23 **A. Yes.**
 24 Q. -- and the day after others had been arrested in respect
 25 of the events of 3 March?

Page 126

1 **A. Yes.**
 2 Q. You send an email to Nicky Moore, saying:
 3 "See below. Speak soon re Rimmer [and someone else
 4 that we don't need to trouble ourselves with] ..."
 5 Nicky Moore replies to you within a couple of
 6 minutes:
 7 "Thank you."
 8 Then she says this:
 9 "Not had the amended MG3 yet either!"
 10 **A. Yes.**
 11 Q. She seemed to be keen to have that quite quickly after
 12 arrest; is that fair?
 13 **A. Yes, she was just saying that she hadn't had it.**
 14 **I don't know what context it was in, but we were**
 15 **talking about another case.**
 16 Q. Thank you very much.
 17 THE CHAIRMAN: Sorry, was that in reference to another case
 18 do you mean?
 19 **A. Yes, could you just repeat your first bit of that,**
 20 **please.**
 21 MS WHYTE: It says Op Shire but sometimes subject headings
 22 can relate to previous parts of the thread.
 23 **A. The confusion came a bit with my emails because I was**
 24 **prosecuting David Totton's brother at the same time for**
 25 **robberies, so sometimes they crossed over because Nicky**

Page 127

1 **was -- Ms Moore was the prosecutor on that as well.**
 2 Q. I am not sure we have to whole thread, in fairness.
 3 **A. The MG3 is in relation to Shire though.**
 4 Q. It is in relation to Shire?
 5 **A. It is in relation to Shire.**
 6 Q. It is not unusual for the CPS to want the MG3 very
 7 promptly after an arrest?
 8 **A. Yes, it is not unusual.**
 9 THE CHAIRMAN: So I understand that, you are saying that
 10 there was another case pending against David Totton's
 11 brother at the time and you were involved in that?
 12 **A. Yes, I was the officer in the case.**
 13 THE CHAIRMAN: And sometimes you were using a thread
 14 relating to Operation Shire to deal with the matter --
 15 **A. It is where I have stored my emails, because we have**
 16 **changed email systems so I have just looked at Totton**
 17 **and moved them across, and sometimes it is Operation**
 18 **Adequate, which Paul Totton was prosecuted on, and**
 19 **Operation Shire.**
 20 THE CHAIRMAN: This is not a question of storing, is it,
 21 this is actually an Op Shire --
 22 **A. Yes, but we have changed email systems so I have moved**
 23 **everything into files on the old email system --**
 24 THE CHAIRMAN: I see.
 25 **A. -- and I have used "Totton" as the reference. To move**

Page 128

1 **him into the Shire one on occasion and it has been to do**
 2 **with my other operation. But that MG3 is definitely to**
 3 **do with Operation Shire. Sorry for causing confusion.**
 4 MS WHYTE: Thank you.
 5 Thank you, sir.
 6 MR STRAW: Sir, this is out of order.
 7 Mr Davies raised a question about whether the
 8 officer was surprised at the judge's decision in the
 9 Operation Vulture trials, might I just be given
 10 permission to ask one question about that?
 11 THE CHAIRMAN: No. Not at this stage. I will tell you why.
 12 I am going to raise that question in a moment in any
 13 event. It may be that I will give you leave to ask
 14 something further after that once I know what it is or
 15 once at least you have told Mr Beer and Ms Cartwright.
 16 Mr Beer, do you have any other questions at this
 17 stage for this witness?
 18 MR BEER: No, other than relating to that issue.
 19 THE CHAIRMAN: Right.
 20 All right.
 21 Well now, Mr Clark, I am not releasing you at this
 22 stage, it looks as though your evidence has, if not
 23 completely finished then virtually completely finished.
 24 I am going to ask you to leave the room at this stage,
 25 please, but remain outside because you may be needed

Page 129

1 again in a few minutes time.
 2 **A. Okay, thank you. No probs.**
 3 **(The witness withdrew)**
 4 THE CHAIRMAN: Mr Beer, had you received any notice of the
 5 questioning, that part of Mr Davies's questioning?
 6 MR BEER: No.
 7 THE CHAIRMAN: No.
 8 Mr Davies, I think I did emphasise earlier in this
 9 hearing the importance of adhering to the procedure that
 10 has been laid down for notifying questions in advance
 11 and complying with rule 10. I was surprised by that
 12 question; it didn't seem on the face of it to me to be
 13 a proper question.
 14 What, please, is the explanation?
 15 MR DAVIES: Firstly, Mr Beer's bald answer "no" is
 16 incomplete, because the questions we sought to ask were
 17 an assumption that he would cover parts of the witness
 18 statements which to some extent he did. If we are
 19 expected to type out every question from every witness
 20 statement --
 21 THE CHAIRMAN: I would have thought --
 22 MR DAVIES: -- the exercise becomes disproportionate.
 23 THE CHAIRMAN: I should have thought a question like that,
 24 which on the face of it seems at least potentially
 25 liable to attract some opposition, might have been

Page 130

1 notified to counsel to the Inquiry.
 2 MR DAVIES: There has been earlier evidence, sir, I have
 3 forgotten the witness, that the evidence in Vulture was
 4 characterised by police as overwhelming. I can't
 5 remember my precise question this afternoon, if it is
 6 improper I apologise, but --
 7 THE CHAIRMAN: You were asking him for his view. On the
 8 face of it you were asking him as to his view as to the
 9 propriety of a judicial ruling in another case where we
 10 don't have the submissions or anything to judge it
 11 anyway.
 12 MR DAVIES: I didn't suggest it was an improper ruling, sir,
 13 at all.
 14 When you have hard physical evidence and
 15 surveillance, and despite the exhaustive Inquiry that is
 16 has been conducted, and is being conducted, here and the
 17 obvious importance of Vulture to the background
 18 intelligence picture --
 19 THE CHAIRMAN: Yes.
 20 MR DAVIES: -- it is a fact, bluntly, that the surveillance
 21 picture coupled with the physical recovery of cash and
 22 other items and the ruling of no case to answer is
 23 objectively surprising.
 24 THE CHAIRMAN: Yes, that is a matter for comment for you,
 25 perhaps, in a closing address. It is not a proper

Page 131

1 matter to put to a witness like Mr Clark.
 2 MR DAVIES: In which case I apologise, sir.
 3 THE CHAIRMAN: Thank you.
 4 Mr Straw, what do you want to pursue?
 5 MR STRAW: Sir, the issue that I was going to consider
 6 pursuing is to ask Mr Clark --
 7 THE CHAIRMAN: You want to ask a similarly improper question
 8 to try and put it in some sort of perspective, do you?
 9 MR STRAW: No, now that you have given that address to
 10 Mr Davies, sir, I do not seek to pursue it but just to
 11 explain what the issue was earlier it was simply to ask
 12 the witness what information he had before him when
 13 coming to that conclusion that it was surprising and to
 14 compare that to the judge.
 15 THE CHAIRMAN: Mr Beer, is there anything else that you wish
 16 to raise with this witness now or anything you wish to
 17 say in relation to the matters that I have raised?
 18 MR BEER: No, I mean it is right that Mr Davies says "Cover
 19 the issues in a witness's witness statement".
 20 THE CHAIRMAN: Yes.
 21 MR BEER: One of the issues in his witness statement was not
 22 the extent to which, given the four matters that
 23 DC Clark refers to on page 2 of his statement of
 24 30 September 2013, two of which related to
 25 surveillance -- in fact three of which related to

Page 132

<p>1 surveillance, one of which related to the possession of 2 cash -- 3 THE CHAIRMAN: Hmm. 4 MR BEER: -- whether the judge's ruling was surprising or 5 whether, notwithstanding the judge's ruling, the 6 intelligence had been assessed to be reliable or that 7 there was a good case and therefore it was proper to 8 pass it on. 9 If that was to be pursued, I think, given that three 10 of the four pillars on which DC Clark relied related to 11 surveillance and it seems from his own statement that 12 the judge dismissed the charges due to problems with the 13 surveillance evidence. We may have pursued an issue of 14 seeking the ruling or for more details about Operation 15 Vulture in 1995/1996. 16 THE CHAIRMAN: Right. 17 MR BEER: But, sir, I didn't ask the question, not because 18 it had been flagged up and I decided not to, it was 19 because it had not been flagged up. 20 THE CHAIRMAN: All right. 21 MR BEER: I haven't anything more to pursue with DC Clark. 22 THE CHAIRMAN: He need not come back I don't think -- well, 23 perhaps he better had, I think. It would be only 24 courteous to come back, if only to tell him he is not 25 required.</p> <p style="text-align: center;">Page 133</p>	<p>1 (2.59 pm) 2 (A short adjournment) 3 (3.04 pm) 4 THE CHAIRMAN: Yes, Mr Beer. 5 MR BEER: Rocque Fernandes, please. 6 MR ROCQUE FERNANDES (sworn) 7 THE CHAIRMAN: You are very welcome to sit down if you would 8 like to, Mr Fernandes. 9 A. Thank you, sir. 10 Questions from MR BEER 11 MR BEER: Mr Fernandes, my name is Jason Beer I ask 12 questions on behalf of the Inquiry. In front of you 13 there is a folder. If you open it at tab 1, please, you 14 should find a witness statement in your name dated 15 20 October 2016. 16 A. Thank you. 17 Q. Yes? 18 A. Yes. 19 Q. If you look at tab 2, please, you should see a witness 20 statement in your name dated 6 December 2016. Tab 2, 21 6 December 2016. 22 A. Yes, the first one is a draft, sir. Yes. It is not 23 signed this one. 24 Q. The first one is a draft, is it? 25 A. Well, yes, I was asked to do one, I think, I've got my</p> <p style="text-align: center;">Page 135</p>
<p>1 MR DAVIES: Just so it is clear, we opened the relevance of 2 Vulture orally very clearly. 3 THE CHAIRMAN: Yes, I don't dispute that, Mr Davies. 4 (Mr Clark returned to the Inquiry room) 5 THE CHAIRMAN: Mr Clark, that is in fact the end of your 6 evidence and you are now free to go. 7 A. Thank you. 8 THE CHAIRMAN: Thank you. 9 I don't want, Mr Davies, to insist on the letter of 10 every aspect of rule 10 being followed or every aspect 11 of the arrangements that have been made for the 12 notification of questions but I do, again, and this is 13 I think the second time I have said it, not in relation 14 to you. I do again make it clear, however, that if 15 I get the impression that questions that ought to have 16 been submitted first to counsel to the Inquiry, because 17 they might attract an objection, are not submitted in 18 advance, I may be left with no option but to be very 19 sticky about the whole thing. 20 MR DAVIES: Understood. 21 THE CHAIRMAN: Right. 22 Do you want to break at this stage, Mr Beer, or do 23 we carry straight on? 24 MR BEER: A break would be welcome. 25 THE CHAIRMAN: Thank you. Five minutes.</p> <p style="text-align: center;">Page 134</p>	<p>1 copies here. I was asked to do a statement, sir, and 2 then it went to the Inquiry. 3 Q. Yes. 4 A. Then someone came to see me to sign one. So I think -- 5 I am not sure which one is which, but I have got a copy 6 here. 7 Q. There are two statements dealing with different things? 8 A. Okay. 9 Q. One is dealing with your contact and liaison with 10 Cheshire Police, in broad terms -- 11 A. Right. 12 Q. -- and the other is dealing with your emails after you 13 had had access to them? 14 THE CHAIRMAN: You are going to be asked to confirm whether 15 they are correct, so it would be a good idea to have 16 a quick look through them, just to make sure you know 17 what they are. 18 A. Yes. 19 MR BEER: You said you brought a statement with you today. 20 A. It is just my copies, yes. 21 Yes, I understand what you are saying now, two 22 totally different statements, yes. 23 Q. Right. If we look at the first one, dated 24 20 October 2016, is that the same as the one that you 25 have with you, your copy? Just maybe have a look at the</p> <p style="text-align: center;">Page 136</p>

<p>1 length of it, eight pages, and the date of it, 2 20 October.</p> <p>3 A. Yes, that's correct.</p> <p>4 Q. Thank you. Are the contents of that statement, the 5 20 October one, true to the best of your knowledge and 6 belief?</p> <p>7 A. Yes, that is true, sir.</p> <p>8 Q. Thank you.</p> <p>9 Then the 6 December one, the much shorter one which 10 just really produces 22 emails and highlights one in 11 particular, are the contents of that statement true to 12 the best of your knowledge and belief?</p> <p>13 A. Yes, that is true.</p> <p>14 Q. Thank you.</p> <p>15 By way of background then, can you tell us when you 16 joined the police service?</p> <p>17 A. October 1986.</p> <p>18 Q. And so you I think did your 30 years and retired on 19 26 October 2016?</p> <p>20 A. Yes, that is correct.</p> <p>21 Q. In October 2011, before working for a little while on 22 Operation Shire, where were you stationed and what role 23 were you performing?</p> <p>24 A. Is that just prior to working – yes, so within the 25 Robbery Unit, I started on there 10 October 2011.</p> <p style="text-align: center;">Page 137</p>	<p>1 Q. -- on page 1 of the book. Finishing on Friday, 2 11 November, on page 4 of the book.</p> <p>3 A. Yes, that is correct.</p> <p>4 Q. These are extracted from DI Cousen's book?</p> <p>5 A. That's correct, yes.</p> <p>6 Q. So he left his book behind, when he went off, and you 7 wrote in it, yes?</p> <p>8 A. Yes, I think as you can see this a new book as well, for 9 some reason. There is page 1 there, so he would have 10 locked his other books away and they would have been 11 locked away in the office, yes, but this is page 1 on 12 a new book as well.</p> <p>13 Q. Okay, so we can see that you provided cover on the face 14 of this book for Friday, 4 November, until Friday, 15 11 November, is that right?</p> <p>16 A. Yes, that's correct.</p> <p>17 Q. So a Friday to a Friday?</p> <p>18 A. Yes, that is what it says there.</p> <p>19 Q. Just a couple of small points on that. Can we take out 20 K/1116, please. Mrs Shaw, the usher, will show that to 21 you.</p> <p>22 If you turn up page 1116, please. (Pause)</p> <p>23 A. Yes.</p> <p>24 Q. I think this is the last page of the book before, can 25 you see it is an entry for 3 November 2011, and can you</p> <p style="text-align: center;">Page 139</p>
<p>1 Q. Okay. Were you a temporary detective inspector then?</p> <p>2 A. Yes, that's correct.</p> <p>3 Q. I think you probably had your own workload, you had 4 I think three DSs under you who had a number of DCs 5 under them, is that right?</p> <p>6 A. That's correct.</p> <p>7 Q. Was one of your functions to provide cover for Detective 8 Inspector Rob Cousen when he was away or on leave?</p> <p>9 A. Yes, it is -- generally, what, how the office worked is 10 there were two of us, there were two inspectors and we 11 had other roles. So obviously I started in there on 12 10 October. The role is totally new to me and I am 13 quite keen to learn --</p> <p>14 Q. Yes.</p> <p>15 A. -- all the role. So yes, when Rob was not there, 16 I would be the sole inspector for that unit.</p> <p>17 Q. Okay, so when he was away, whether it be on leave or 18 whatever, a course or another abstraction, you tell us 19 in your witness statement that you made entries in his 20 casebook for the operation that you were then dealing 21 with, is that right?</p> <p>22 A. Yes, I have done that and I can come on to explain that.</p> <p>23 Q. If we look in tab 4 of your bundle, please, can we see 24 some notes, starting on Friday, 4 November --</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 138</p>	<p>1 see he says:</p> <p>2 "I am on annual leave for the next week or so, 3 returning on 15 November. Whilst I am away from the 4 office the SIO will be DI Rocque Fernandes."</p> <p>5 A. Yes, I can see that.</p> <p>6 Q. It seems on his note that he was away until the 15th 7 rather than the 11th.</p> <p>8 A. Right, if that is correct.</p> <p>9 Q. Can you see that?</p> <p>10 A. Yes, I can see that there. I don't know -- obviously 11 this day back, I don't know.</p> <p>12 Q. It wouldn't be the first day back, would it, your notes 13 I think started on the 4th and finished on the 11th, so 14 it would be the 12th, 13th and 14th that there is the 15 discrepancy. Do you see what I mean?</p> <p>16 A. Right. What days of them are the weekend or --</p> <p>17 Q. I think two of those days would be a weekend.</p> <p>18 A. All right.</p> <p>19 Q. Namely Saturday the 12th and Sunday the 13th, but then 20 Monday would be 14 November, before he came back on 21 Tuesday the 15th. Can we just look, in the same bundle, 22 please, at page 1123.</p> <p>23 He records after you had finished your previous 24 page, if you look before, you can see the end of your 25 writing, he says, "I have now resumed the role of SIO".</p> <p style="text-align: center;">Page 140</p>

1 **A. Yes.**
 2 Q. Does the fact that your notes ended on the 11th suggest
 3 that nothing relevant happened on the 12th, 13th and
 4 14th?
 5 **A. I would like to give you a clear answer but I don't**
 6 **know -- I might not have been on duty them days.**
 7 Q. Right.
 8 **A. It was not a Monday to Friday job, 100 per cent, I might**
 9 **have been on leave.**
 10 Q. Okay.
 11 **A. So I can't say.**
 12 Q. Okay, but if you were on leave and Mr Cousen was away,
 13 who would be the SIO for the operation?
 14 **A. So I would like to explain that in a bit more detail if**
 15 **that is all right or do you want me to hang on for**
 16 **a bit?**
 17 Q. No, no, you go ahead.
 18 **A. There is obviously like each investigation will have**
 19 **a structure, so you will have an SIO, Deputy SIO,**
 20 **officer in the case.**
 21 Q. Yes.
 22 **A. I am quite new to the office and one of my concerns is**
 23 **that there is an operation ongoing, that don't really --**
 24 **my staff are involved in it, I am not the SIO of it,**
 25 **there is other enquiries ongoing through that week.**

Page 141

1 **Probably, in hindsight, I might have dealt with it**
 2 **differently because you have a Deputy SIO when the SIO**
 3 **is not actually present because you have got full**
 4 **knowledge of the job.**
 5 Q. Just to cut into your cutting in, we have been told that
 6 one of the duties of a Deputy SIO is to act up as the
 7 SIO when the SIO is not present?
 8 **A. Yes. Yes. That is the point I am making. So I am not**
 9 **saying that I wasn't the SIO, what I am saying is in**
 10 **hindsight, probably, like the Deputy SIO would have been**
 11 **the SIO for that period.**
 12 Q. Right.
 13 **A. This is just one way of doing it, and I would have give**
 14 **her all the support as being a more senior officer in**
 15 **that unit, when she needed resources she could update**
 16 **me.**
 17 Q. I see.
 18 **A. What I -- just looking back at them notes, because I am**
 19 **new to the office and things are happening in my office,**
 20 **I want to know what is happening as well. So that is**
 21 **why I have written them notes, that is why I've got**
 22 **knowledge of the investigation over that week as well.**
 23 Q. Do you know in fact why DS Hurst didn't act up as the
 24 SIO?
 25 **A. Well, no, I don't think it was spoken about, it is just**

Page 142

1 **that I am the inspector and she was the sergeant, so it**
 2 **is probably, you know, like assumed that I would be the**
 3 **SIO.**
 4 Q. Do you know particularly why, just out of interest, she
 5 was not the SIO, given that is the function of a deputy
 6 to act up when the senior is not there?
 7 **A. It is probably more the case that when Rob has gone off,**
 8 **we were two inspectors together, he has his operation**
 9 **ongoing, I am new, want to learn things, so I have kind**
 10 **of stepped into that role. What I am saying is had any**
 11 **very important decisions been made that week, I would**
 12 **have consulted fully with the Deputy SIO. I may have**
 13 **made the decision but she has got the full detailed**
 14 **knowledge, being the Deputy SIO.**
 15 Q. Okay, I asked you whether the absence of notes for the
 16 12th, 13th and 14th meant that nothing significant
 17 happened and you told us, not necessarily, it might mean
 18 that your duties meant that you were not on for the
 19 Saturday, Sunday, Monday?
 20 **A. Yes, that is all I am able to say, if there are no notes**
 21 **there, as you can see, what I have done in them notes,**
 22 **I have sat down and debriefed staff at the end of the**
 23 **day about what has happened. I can't say what has**
 24 **happening on them dates.**
 25 Q. No.

Page 143

1 One clue as to what was happening on one of them, if
 2 you just look at tab 6, please, of your bundle -- no,
 3 the other bundle, that's it.
 4 Do you see in the bottom right there are some page
 5 numbers, if you look at 64.
 6 **A. Yes.**
 7 Q. There is an email -- this is part of the emails that you
 8 recovered for us. There is an email, I think that is
 9 probably later in the week, is that right?
 10 **A. It is dated the 18th, sorry.**
 11 Q. The 18th. If you look at 63 then, the week before, can
 12 you see that on page 63?
 13 **A. Dated the 11th.**
 14 Q. The 11th. I think that would have been the Friday at
 15 1.10 and DS Hurst is saying:
 16 "We have the DSU for Op Shire on a 2 to 10 [that is
 17 a 2.00 pm to 10.00 pm afternoon shift on the Monday] the
 18 following staff will be required on a 1 to 9 shift to
 19 deploy in ops [observational post] as follows Kev,
 20 Digger, Martin and Tolly."
 21 And she asks whether Tolly can liaise with you and
 22 update the DSU with any intel developments prior to
 23 their briefing.
 24 That would be I think Monday the 14th, yes?
 25 **A. Monday, the 14th?**

Page 144

1 Q. She is emailing at 1.10 on a Friday saying we have the
 2 DSU for a 2 to 10 shift on the Monday, so that would be
 3 Monday the 14th?
 4 **A. Yes, yes, I can see the email.**
 5 Q. Yes, so it tends to suggest there was some activity on
 6 the Monday.
 7 **A. Planned activity, I don't know if it -- did it take**
 8 **place?**
 9 Q. You don't know whether it took place or not?
 10 **A. No.**
 11 Q. Did you receive a handover from DI Cousen before he
 12 went?
 13 **A. There was obviously there was regular -- I would have**
 14 **had a conversation, that is why he has put in his book**
 15 **that I am the SIO, that is why I have written in it. It**
 16 **would be totally impossible to read all the material**
 17 **about everything for the whole job, and that is why I am**
 18 **saying, probably, a more sensible approach would have**
 19 **been for DS Hurst to carry on her role as the SIO, me,**
 20 **being fairly new to that office and that role, would**
 21 **give her all the support necessary.**
 22 Q. Okay. In fact that didn't happen and you were the SIO.
 23 Did you get a hand over from DI Cousen re this case or
 24 not?
 25 **A. I can't actually remember the handover, but I would like**

Page 145

1 **to think there was, and would be sure there was but I am**
 2 **going back five years ago and I can't remember exactly.**
 3 Q. I understand.
 4 If we look at your notes in tab 4, please, and in
 5 particular if you look at when you actually get your
 6 feet under the desk on Monday, the 11th, on page 54, can
 7 you see you have made an entry, "9.00: new intelligence
 8 received", yes?
 9 **A. Yes.**
 10 Q. Then on Tuesday the 8th at 8.00, "No new intelligence
 11 received"?
 12 **A. Yes.**
 13 Q. Then Wednesday, the 9th, "No new intelligence"?
 14 **A. That's correct.**
 15 Q. Thursday the 10th, "no new intelligence" and Friday the
 16 11th, "no new intelligence"?
 17 **A. Yes.**
 18 Q. A full suite that week of no new intelligence for the
 19 five working days of the week?
 20 Why is it that the first thing of the day that you
 21 have noted down?
 22 **A. So these entries will be me sitting down with the staff**
 23 **that are deployed on it, that are named there and**
 24 **I would have asked them, because I am not -- the**
 25 **intelligence would have been going to them, it wouldn't**

Page 146

1 **have been coming to me, so it is probably one of the**
 2 **questions I have asked, is there anything new? Any new**
 3 **intelligence? Because obviously that will impact on,**
 4 **you know, what the plans are and things like that.**
 5 Q. For the day?
 6 **A. Yes.**
 7 **So all I am doing in these notes is the staff that**
 8 **are working on it full time, saying, "Right, what is the**
 9 **plan? What have you got? Is there anything new?"**
 10 Q. Yes, so would you regard that, even in your sort of
 11 tender service in the Robbery Unit at this stage as
 12 an important thing to do first thing in the day, to make
 13 a check and a record of having made a check on whether
 14 there has been any new intelligence?
 15 It stands to reason that you are going to say yes,
 16 doesn't it, because you did it.
 17 **A. It sounds sensible, because if one of the suspects are**
 18 **in custody or something important has happened, it could**
 19 **impact on the whole day, what they are doing.**
 20 Q. Yes. You mentioned, as indeed a number of other police
 21 officers have, that you want to find out whether your
 22 suspects are in custody, almost the first thing that is
 23 important. Is it a bit more broad than that, because
 24 that is important --
 25 **A. Yes, that is just an example.**

Page 147

1 Q. That is important but quite simple.
 2 Is there a broader range of intelligence checks
 3 undertaken to your knowledge?
 4 **A. I mean "intelligence" has a wide meaning, it could mean**
 5 **anything.**
 6 Q. Yes.
 7 **A. This was a direct probing question to the staff that are**
 8 **dealing with this, is there anything new to know, you**
 9 **know, intelligence can mean all sorts of information?**
 10 Q. Did you have access to something called the
 11 "intelligence chronology", with a capital I and capital
 12 C, ie it is a thing?
 13 **A. I would say not, because it is not something that**
 14 **I have, you know, when you mentioned it there, it is not**
 15 **something that jumps out to me to say I've got knowledge**
 16 **of it.**
 17 Q. We have heard it is a password-protected document, about
 18 10 pages long, kept on the S: drive, knowledge limited
 19 to the SIO, Deputy SIO, DC Clark and potentially others.
 20 It is not something that you remember?
 21 **A. From memory, I would say no.**
 22 Q. When you were asking this question, you were saying to
 23 the staff on the job, "By reference to the full range of
 24 intelligence that you can access, is there anything
 25 new?"

Page 148

1 **A. Yes, I was just basically saying, you know, because**
 2 **I have put down there I have not been told of any new**
 3 **information.**
 4 Q. That also acts as a check, does it, that they have done
 5 their jobs in searching for intelligence?
 6 **A. Yes. When we say intelligence, it is not the strict**
 7 **meaning of intelligence, so it could be anything, it**
 8 **could be, for example, they have come in and done**
 9 **a search and found a police incident log to do with one**
 10 **of their -- you know, to do with a nominal or an address**
 11 **or anything.**
 12 **So I am guided by the use of intelligence, because**
 13 **intelligence could mean a wide range of information.**
 14 Q. Yes.
 15 Could I turn to 2 March 2012 then, this is winding
 16 forwards three months.
 17 I think you again provided some cover for DI Cousen
 18 on 2 March 2012; is that right?
 19 **A. Is it okay if you explain what you mean by cover on the**
 20 **2 March.**
 21 Q. You tell me what you did then, in broad terms, on
 22 2 March?
 23 **A. My recollection of 2 March --**
 24 Q. Not in detail, use a word like I have, "Cover", to
 25 describe the whole thing?

Page 149

1 **A. I would say that I didn't provide any cover as such. So**
 2 **I am the inspector, come into the unit, I would normally**
 3 **have my staff there and jobs would be coming in and they**
 4 **would be dealing with other jobs. So as I have come in**
 5 **in the morning I realise that some staff have been**
 6 **deployed during the night and have been on duty.**
 7 Q. Yes.
 8 **A. At some stage, very early, I have seen Rob, basically**
 9 **leaving the office, unbeknown to me he has been on -- he**
 10 **is going home, and I am just trying to be helpful by**
 11 **saying, "Is there anything I can do?" You know, "Is**
 12 **there anything you want doing?"**
 13 Q. Yes.
 14 **A. And from recollection, from reading the notes, he has**
 15 **basically said, Debbie Hurst has got it in hand about**
 16 **speaking to Cheshire, and that was it, it was like**
 17 **I would say a 10-second conversation.**
 18 Q. You saw him as he was going out; is that right?
 19 **A. Yes. So I can distinctly remember him leaving the**
 20 **building with his coat on. He had been on during the**
 21 **night and he was about to go home.**
 22 Q. You said he said Debbie has it in hand, dealing with
 23 Cheshire. Is that right?
 24 **A. Yes, it was all about letting Cheshire know about the**
 25 **activities during the night.**

Page 150

1 Q. Okay.
 2 **A. And, as you well know, there is an entry in the book**
 3 **along them lines.**
 4 Q. Yes.
 5 Can you recall whether he asked you to do anything
 6 that day?
 7 **A. If he asked me to do anything? It was along the lines**
 8 **of, you know, the staff have got it in hand, speaking to**
 9 **Cheshire, there might be a phone call that you need to**
 10 **speak to Cheshire about. As I say, it is -- I do not**
 11 **have -- I don't have memory at all. It is about reading**
 12 **these notes now and trying to remember five years ago.**
 13 Q. You said it is in the notes about DS Hurst dealing with
 14 Cheshire, what note are you referring to there?
 15 **A. It is in the --**
 16 Q. In DS Hurst's casebook.
 17 **A. I thought it was in like DI Cousen's casebook.**
 18 Q. DI Cousen's casebook, if you look, please, at K/1244.
 19 Do you have that, 1244, Mr Fernandes? (Pause)
 20 Can you see an entry for 2 March, which is the
 21 Friday we are talking about? Where DI Cousen has said:
 22 "Contacted by DI Fernandes, Chief Inspector
 23 Chris Brierley requires contacting ..."
 24 Then he goes on to a 4.00 pm entry.
 25 **A. It is page before that, sir, I am talking about.**

Page 151

1 Q. It is the night before, is that right, so the evening of
 2 the 3rd, going into -- the evening of the 1st going into
 3 the morning of the 2nd, on 1243?
 4 **A. Yes, so that entry there, where it says 7.00 stand down.**
 5 Q. No movement of subjects?
 6 **A. Then it has:**
 7 **"DS Hurst is to contact Cheshire regarding**
 8 **disruption, mitigation around CVITs in the Culcheth**
 9 **area."**
 10 Q. Yes. That appears to be the last thing that DI Cousen
 11 has said or recorded as having said on the morning of
 12 Friday the 2nd, yes?
 13 **A. Yes. That's correct.**
 14 Q. Did he tell you that, that come Friday morning the next
 15 part of the plan was for DS Hurst to contact Cheshire
 16 Constabulary, Cheshire Police, regarding disruption or
 17 mitigation concerning cash in transit vans?
 18 **A. No, as said before, it was not worded like that. I have**
 19 **bumped into him and said, "Is there anything you want me**
 20 **to do today? Is there anything you want me doing?" He**
 21 **has kind of said, "No, it is in hand" and they are going**
 22 **to contact Cheshire. That was in relation to that**
 23 **entry.**
 24 Q. Was DS Hurst in the office at that time?
 25 **A. Yes, she didn't leave at 7.00, because I remember, you**

Page 152

<p>1 know, because I can actually remember her sitting on the</p> <p>2 other side of the office.</p> <p>3 Q. Yes.</p> <p>4 A. Because I was waiting for either contact from or me to</p> <p>5 contact Cheshire but I didn't have any information for</p> <p>6 me personally to give them.</p> <p>7 Q. And so she hadn't left at this time. Do you know</p> <p>8 whether, before she did leave, because there did come</p> <p>9 a point when she did leave the office, isn't there?</p> <p>10 A. Yes.</p> <p>11 Q. Did she contact Cheshire, to your knowledge?</p> <p>12 A. This is from me now reading what is available.</p> <p>13 Q. Yes.</p> <p>14 A. Somebody has completed a -- they are called a 5x5x5 log,</p> <p>15 an intelligence log. It appears that that has been sent</p> <p>16 over to Cheshire.</p> <p>17 Q. Did she tell you that she was going to do that, can you</p> <p>18 recollect if it was her, before she left?</p> <p>19 A. I can't remember the wording about it, what I do</p> <p>20 remember, around that, is I am waiting for like a list</p> <p>21 of premises and you can see from the later statement</p> <p>22 from DC Holliwell.</p> <p>23 Q. Holliwell, Stephen Holliwell?</p> <p>24 A. Yes, that I had provided -- I must have been provided</p> <p>25 a list of four premises, because I then passed it on by</p> <p style="text-align: center;">Page 153</p>	<p>1 Q. "... but is looking after the inquiry whilst the inquiry</p> <p>2 team are having time off."</p> <p>3 Is that correct?</p> <p>4 A. No, I would say it is not correct.</p> <p>5 Q. Which part of it is not correct?</p> <p>6 A. I was not looking after the inquiry because, I didn't</p> <p>7 know what had happened the night before, I wasn't the</p> <p>8 SIO. As far as I was concerned the team that are</p> <p>9 dealing with it have gone off duty, I have explained the</p> <p>10 conversation that I have had with the SIO as he has gone</p> <p>11 off. The information was going to be passed through to</p> <p>12 Cheshire if there was any calls, further calls from</p> <p>13 Cheshire, you know, then I could deal with it but as you</p> <p>14 will see from my statement, and the entries in Rob's</p> <p>15 book, when there was contact with Cheshire I passed them</p> <p>16 through to Rob Cousen.</p> <p>17 Q. Yes, we will come on to those in a moment. I am still</p> <p>18 at the moment in the foothills of trying to work out</p> <p>19 what your role was.</p> <p>20 A. Okay.</p> <p>21 Q. If you look at the rest of that entry, do you see the</p> <p>22 black redaction? Next to a sentence that begins, "The</p> <p>23 SIO for this operation ..." Do you see that? It is the</p> <p>24 same entry but about 15 lines on:</p> <p>25 "The SIO, DI Rob Cousen [then his mobile number] for</p> <p style="text-align: center;">Page 155</p>
<p>1 phone.</p> <p>2 Q. Who were you waiting for that list from?</p> <p>3 A. Well it would have come from either DS Hurst or someone</p> <p>4 on her team that has worked that night before.</p> <p>5 Q. Can I try and understand what your role was that day by</p> <p>6 looking at tab 11, please, in your bundle and page 132.</p> <p>7 This is part of Cheshire Police's effectively force</p> <p>8 incident record keeping.</p> <p>9 A. Yes.</p> <p>10 Q. Can we look at the entry which has 1425 hours, which is</p> <p>11 the second one down. Do you have that, 132? It is</p> <p>12 timed as having been made at 16.05.</p> <p>13 THE CHAIRMAN: 131 in ours, in mine anyway.</p> <p>14 MR BEER: I am so sorry, 131, you are quite right, I misread</p> <p>15 the number. Page 131, there is an entry at 16.05 and</p> <p>16 I think it says it happened at 14.25. Do you have that?</p> <p>17 THE CHAIRMAN: The second entry down.</p> <p>18 MR BEER: Thank you.</p> <p>19 A. Yes, because I can see that --</p> <p>20 Q. It is an entry by Mr Holliwell -- who we are going to</p> <p>21 hear from -- and he says 1425 hours:</p> <p>22 "Spoken to DI Fernandes, who is not the SIO for this</p> <p>23 operation."</p> <p>24 That's correct, isn't it?</p> <p>25 A. That's correct, yes.</p> <p style="text-align: center;">Page 154</p>	<p>1 this operation has been on duty for two days and has had</p> <p>2 today off to recover and is contactable on [his mobile</p> <p>3 number]. If there is any further questions he is</p> <p>4 contactable."</p> <p>5 Yes? Stopping there.</p> <p>6 It was the case that the SIO remained Rob Cousen?</p> <p>7 A. Yes.</p> <p>8 Q. He had had an extended period of duty?</p> <p>9 A. I don't know what he had worked, sorry.</p> <p>10 Q. Okay. Do you know how Mr Holliwell has you down as</p> <p>11 saying to him, "The SIO has been on duty for two days"?</p> <p>12 A. No, but the conversation with that officer started early</p> <p>13 in the morning, didn't it, when I explained to him that,</p> <p>14 you know, the SIO was off duty, had gone home.</p> <p>15 Q. When did DS Hurst go home?</p> <p>16 A. I don't know, you would have to ask that officer, sorry.</p> <p>17 Q. Have you any recollection of when she left?</p> <p>18 A. No. All I can say is it was after Rob, because Rob was</p> <p>19 leaving.</p> <p>20 Q. Yes.</p> <p>21 A. I would have got the information about these premises</p> <p>22 from Deb Hurst or one of her staff, so she would have</p> <p>23 been later leaving.</p> <p>24 Q. You have said two things about DS Hurst, that firstly</p> <p>25 she was going to contact Cheshire about something, yes?</p> <p style="text-align: center;">Page 156</p>

1 **A. Yes.**
 2 Q. We have seen the last entry in DI Cousen's book for that
 3 morning as saying that she was to contact Cheshire
 4 regarding disruption or mitigation about cash in transit
 5 vans, yes? CVITs?
 6 **A. That is what it says there.**
 7 Q. Yes. Can you remember whether you were told that, that
 8 the focus was on disrupting mitigation activity
 9 concerning cash in transit vans?
 10 **A. No, I can't remember that.**
 11 Q. You said something else, that you were to be given the
 12 names of some premises. Is that right?
 13 **A. This is now from reading this statement from**
 14 **DC Holliwell, who says I have passed four premises on.**
 15 **So I would take that as right, if he has got the**
 16 **premises from me I had passed them on.**
 17 Q. Why would you take it from him? We have seen his entry
 18 in the force incident records, which you have said that
 19 there are two things that are wrong about it --
 20 **A. I am not saying it is wrong, you know, has he typed that**
 21 **information on there, you know, has it come from me --**
 22 **all I am saying is I accept what you say there. What**
 23 **I am saying is, if you look at his statement, which**
 24 **talks about earlier conversations and you can get some**
 25 **context that I have -- how the conversation started**

Page 157

1 **earlier and how, as a result of later, I have put the**
 2 **Cheshire officers in touch with Rob Cousen.**
 3 **I haven't got any information about what has**
 4 **happened the night before.**
 5 Q. Okay, I will approach it another way.
 6 When did you first have contact with the Cheshire
 7 officer?
 8 **A. It sounds as though it is around about the 9.00 mark,**
 9 **from that statement from DC Holliwell.**
 10 Q. If we look at that, that is tab 8 in this bundle,
 11 please.
 12 **A. Yes.**
 13 Q. If you look at pages 62 and 63, I think you can get
 14 a time of 9.10 at the top of 63, of him contacting the
 15 force incident manager, Mr Dickinson,
 16 Inspector Dickinson.
 17 **A. Okay.**
 18 Q. Are you saying you contacted him before then?
 19 **A. I can't say 100 per cent if he has rang me or I have**
 20 **rang him.**
 21 Q. Okay.
 22 **A. But what it appears is that somebody has done this**
 23 **intelligence log, has sent it over, so I am not sure if**
 24 **he has then rang me as soon as he has received that.**
 25 Q. Okay. So Mr Holliwell in Cheshire is in possession of

Page 158

1 a B21 intelligence log from GMP concerning suspicious
 2 activity around a cash delivery or financial institution
 3 in the village centre of Culcheth in Cheshire. No
 4 times, dates, targets, vehicles, people or if firearms
 5 are involved. Is that right, according to his
 6 statement?
 7 **A. Yes.**
 8 Q. He spoke with you, yes?
 9 **A. Yes, we have had a conversation.**
 10 Q. You cannot remember which way round it was, him ringing
 11 you or you ringing him?
 12 **A. Yes, that's correct.**
 13 Q. Okay.
 14 If you rang him, how would you know to ring him?
 15 **A. Well, that is why I am -- I mean I don't know.**
 16 **I wouldn't have got his name, so it is -- he has**
 17 **obviously got that log and then he talks about later**
 18 **having the conversation with me, so what I am saying is**
 19 **I don't know which way round it was.**
 20 Q. Can you remember the content of the conversation?
 21 **A. Well, as I say, he has detailed it in his statement.**
 22 Q. Are you looking at the top of 63 now?
 23 **A. Yes.**
 24 Q. This is after 9.00; you told me that you thought that
 25 you had spoken before 9.00.

Page 159

1 **A. I am saying it is around that time because I have seen**
 2 **a time there. I don't know the -- if you jump down**
 3 **a paragraph, it says, "I recontacted Detective Inspector**
 4 **Fernandes ..."**
 5 Q. Yes, so that is a second contact. I was trying to find
 6 out about the first?
 7 **A. Yes, that is what it implies but he has not put about**
 8 **the first contact, has he? So I don't know if he is**
 9 **mistaken. I don't know what he means by "recontacted",**
 10 **because he has not mentioned the first contact, has he?**
 11 Q. No. Well on the previous page, it says, "The contact in
 12 GMP was Detective Inspector Fernandes", as the last
 13 line. Admittedly he has not said that he contacted you.
 14 **A. Yes.**
 15 Q. Let's assume this was the first contact then after 9.10
 16 on the Friday morning, he contacted you and, according
 17 to his witness statement, you said this was a long term
 18 operation, or a long term ongoing operation, which had
 19 identified there was suspicious activity in the Culcheth
 20 area of Warrington. Did you tell him that?
 21 **A. I have no reason to doubt -- if he has put that there,**
 22 **I have no reason to doubt that.**
 23 Q. He, that is you:
 24 "... stated that the officers in charge of this
 25 operation were DI Rob Cousen, who was the SIO, and

Page 160

1 Detective Inspector Deb Hurst."
 2 And that you gave him their contact details, said
 3 that they had been on duty for a long time and that they
 4 had gone home to rest.
 5 Did you tell him that?
 6 **A. I can't say 100 per cent, like some of it sounds**
 7 **correct. I don't know how long they had about been on**
 8 **duty, so I can't say that they had been on a long time**
 9 **but Detective Inspector Hurst should be Detective**
 10 **Sergeant -- the way that, like, unit works, within that**
 11 **proactive world, you don't just do eight hours and then**
 12 **you go home. As an SIO, or a Deputy SIO, you generally,**
 13 **you know, can be contactable 24 hours a day.**
 14 Q. The first two sentences of that paragraph, you think the
 15 first you have no reason to doubt what he says is right.
 16 The second you think that some of it is correct but some
 17 of the details are wrong?
 18 **A. Yes, I mean it is generally right, you know --**
 19 Q. Okay.
 20 **A. -- the --**
 21 Q. The third sentence is:
 22 "He continued to state that the possible institutes
 23 around which suspicious activity may take place were the
 24 NatWest Bank on Warrington Road, the Cheshire Building
 25 Society on Warrington Road, Thomas Cook on

Page 161

1 Jackson Avenue and Sainsbury's on Common Lane, all in
 2 Culcheth."
 3 Did you tell him that?
 4 **A. If he has put it in there and he has said he got it from**
 5 **me, I have no reason to doubt it. I would have been**
 6 **handed that information just before that phone call.**
 7 Q. Who were you given it by?
 8 **A. I can't say if it was DS Hurst or one of her staff, you**
 9 **know, I can't remember but obviously I have no reason to**
 10 **doubt that I have then passed that on.**
 11 Q. I think in all of this you are frankly rather hampered
 12 because you don't have any written records yourself,
 13 have you?
 14 **A. No, as I say, one of things that I do pride myself in in**
 15 **my 30 years' service is actually note keeping, if**
 16 **I could just explain, I don't want to waste your time.**
 17 Q. No, you will not be.
 18 **A. I have worked on many, many murder enquiries, from day**
 19 **one of a murder investigation to the end I write**
 20 **detailed notes, and that is important to me.**
 21 As you can see, where Rob Cousen has gone on
 22 holiday, I have tried my best to capture the
 23 information, you know, so it can be explained to him
 24 when he comes back, as well.
 25 But within the policing world, it is impossible to

Page 162

1 **write everything down on a day-to-day basis of**
 2 **everything you do.**
 3 Q. Looking at it now, he says that at the time of this
 4 contact, which I think through other means we can say
 5 was by 9.10, not after 9.10, you are saying that
 6 DI Cousen and DS Hurst have gone home, yes? According
 7 to his record?
 8 **A. I would say that is right. I don't know the exact time**
 9 **though.**
 10 Q. The reason why I say through other means, if we just
 11 look at tab 11 at page 130.
 12 **A. Yes.**
 13 Q. Can you see at the top of 130, it says:
 14 "09.10: Intelligence disseminated to the force
 15 incident manager, Inspector Dickinson, Karen Laughton,
 16 northern intel, spoken to and DI Fernandes has been
 17 spoken to again and stated that their inquiry is a long
 18 term ongoing operation which has identified that there
 19 was suspicious activity in the Culcheth area of
 20 Warrington. Contact details of the SIO and
 21 DI Deb Hurst, possible institutions where suspicious
 22 activity are ..."
 23 Then they are listed again.
 24 That is why I say the contact with you must have by
 25 9.10, because if this record is accurate he is making

Page 163

1 the entry saying that the contact was at 9.10.
 2 **A. I don't know the exact time but I would have thought**
 3 **that DS Hurst either was about to leave or she would**
 4 **have left, you know, by then.**
 5 Q. Okay.
 6 Can you help us any more on where you obtained the
 7 list of the four premises?
 8 **A. It is very narrow, really. Because it wasn't**
 9 **Rob Cousen. He had gone, I don't think he had it. So**
 10 **it could only have come from one of two other people,**
 11 **DS Hurst, who was still there, or one of the other**
 12 **officers that had been on that night.**
 13 Q. Can you remember who they were?
 14 **A. No, because I hadn't been on that night. I didn't know**
 15 **who was on that night but I think there was only about**
 16 **two or three staff possibly.**
 17 Q. Can you recall now what the significance of passing
 18 a list of four premises to Cheshire Police was?
 19 **A. They had obviously got some information that there had**
 20 **been suspicious activities in that area. So we are**
 21 **talking, from my perspective about five years on, that**
 22 **it is about disruption. Obviously you wouldn't like to**
 23 **stop the operation everyone go home and something**
 24 **happens, so it is a case of telling the police over**
 25 **there, we don't know exactly what is happening over**

Page 164

1 **there but here is a list of potential premises and then**
 2 **leave it for them to assess.**
 3 Q. You have seen DI Cousen's note of early in the morning,
 4 concerning cash in transit deliveries, yes?
 5 **A. Hmm.**
 6 Q. Here we are talking about institutions themselves,
 7 buildings. They might either be different things, one
 8 is a van and one is a building, or they might be -- you
 9 might be talking about the same thing here, ie the vans
 10 are delivering to these premises. Can you remember the
 11 context in which you were passing these names of
 12 premises on?
 13 **A. No, because all I was giving them was a list, someone**
 14 **had sent them that intelligence log and if you have got**
 15 **the intelligence log, it has surely got someone's name**
 16 **on it.**
 17 Q. Yes, it has your name on it actually.
 18 **A. Sorry?**
 19 Q. It has your name as the point of contact on it.
 20 **A. Yes, that doesn't mean that I actually filled the log**
 21 **in.**
 22 Q. No, I realise that.
 23 **A. And I clearly have not filled the log in because it is**
 24 **not something I would do, and my name is spelt wrong,**
 25 **sir.**

Page 165

1 Q. You have this contact which Mr Holliwel has down as the
 2 second contact with you, according to this entry here,
 3 "I spoke to DI Fernandes again". Can we see on page 130
 4 that the very next thing that is done on this log is at
 5 10.30, "Cheshire contact safe cash".
 6 THE CHAIRMAN: Divider 11 again.
 7 **A. Sorry, your Honour.**
 8 MR BEER: Divider 11, page 130.
 9 **A. Yes, I've got that.**
 10 Q. Can you see that the very next entry within an hour and
 11 20 minutes is a very long entry setting out the times of
 12 delivery to premises and to automated telling machines,
 13 cashpoints for the remainder of that day?
 14 **A. Yes. I can see that, yes.**
 15 Q. Can you recall whether GMP, to your knowledge, made
 16 similar enquiries?
 17 **A. I am not aware of that.**
 18 Q. Can you see further on page 130 an entry that is not
 19 timed, but I think must be after 11.45 in the morning,
 20 about 20 lines up from the bottom it says:
 21 "Intelligence number IN12 completed, DI Fernandes
 22 GMP has been spoken to and he has stated there will be
 23 no DSU behind any of the teams today but they will be
 24 returning to the operation Monday morning."
 25 Can you see that?

Page 166

1 **A. Yes, I can see that.**
 2 Q. Did you tell Mr Holliwel that?
 3 **A. I don't recall that conversation but if it is true what**
 4 **he says and what is typed there, that I have said it,**
 5 **then someone would have told me that and I have passed**
 6 **it, but obviously I can't recall the conversation.**
 7 **Because I wouldn't know, I wasn't on during the night so**
 8 **I didn't know if there was a plan over the weekend.**
 9 Q. It looks like you are making contact here, he has so far
 10 now, by 11.45, three contacts with you and then, over
 11 the page, at 2.25, he has a fourth contact with you. He
 12 is obviously contacting you, I think, because your name
 13 was given on the 5x5.
 14 Were you really the only point of contact in GMP for
 15 Cheshire Police to speak to about this operation?
 16 **A. I was obviously the first point of like the initial**
 17 **contact but, as you can quite see, I haven't got the**
 18 **information so if someone asks me information, as you**
 19 **can see later, I put them in touch with like the SIO.**
 20 Q. On the second occasion you have provided four addresses
 21 and on the third occasion you have told them there will
 22 be no DSU activity, according to his notes, yes?
 23 **A. Yes, I mean when someone writes notes like that, they**
 24 **could be question/answer, question/answer,**
 25 **question/answer, it is obviously not written down there,**

Page 167

1 **question/answer. So he might have asked me and I might**
 2 **have said, "Well, not that I am aware of", or something**
 3 **like that. What I am saying is I can't remember the**
 4 **exact conversation five years ago.**
 5 Q. On the fourth contact, over the page at 131, the 14.25
 6 entry, the part that we didn't read in between, about
 7 four lines in:
 8 "He [that is you] has stated the information given
 9 to Mr Gerrard [that is the deputy chief constable of
 10 Cheshire Police] last night is the same team and it is
 11 believed to be an armed gang. The rationale for this
 12 information being given to the Cheshire Police is that
 13 the robbery team have been watching a gang from GMP over
 14 the past two nights, and during this time the gang has
 15 visited the group of shops in the Culcheth area, as
 16 mentioned previously. It is believed that one member of
 17 this gang are known to be involved in breaking into
 18 financial premises over night and waiting till the
 19 morning to commit the robbery. A black bin liner has
 20 been seen during these observations, not known what is
 21 in this bag. There is no definitive intelligence to say
 22 that this is their intended method or whether they are
 23 reconnoitring the premises for CVIT robberies ..."
 24 Then there is the part we have already read. Did
 25 you tell him those things?

Page 168

1 **A. I mean I definitely cannot remember that. I mean what**
 2 **the time of that? Is that the entry 16.05?**
 3 Q. It looks like the way he does it is the computer times
 4 it in the second column from the left, but there is part
 5 of the free text, he has actually put the time in that
 6 the conversation occurred.
 7 **A. Yes.**
 8 Q. Which might be quite a helpful way that some police
 9 officers do things, so that they are not tied to the
 10 time of the entry as being the time of the conversation,
 11 they can get both, the time it was typed up and the time
 12 that the conversation actually occurred.
 13 **A. I think by that time I had already explained to them**
 14 **that they needed to speak to Rob Cousen, because I don't**
 15 **know what time the conversation -- I would have to go**
 16 **back to his book.**
 17 Q. He doesn't time that, Mr Cousen.
 18 **A. That is a lot of information that I think that**
 19 **I wouldn't have had or would have been in like**
 20 **a position at that time to give. Again, you would have**
 21 **to ask the officer and I don't -- I can't remember**
 22 **giving all that information and, as I said, my job at**
 23 **that time was to pass that information about the four**
 24 **premises. I didn't know what had happened overnight so**
 25 **I had my hands tied behind my back there.**

Page 169

1 Q. You see there is quite a lot of information in between
 2 the parts that you agree were accurate, namely, you are
 3 not the SIO and you need to speak to Rob Cousen, which
 4 was the beginning and the end of that entry.
 5 **A. Yes and as I said, the way the team work, you know,**
 6 **I have done it in different roles, your phone is**
 7 **literally on 24 hours a day.**
 8 MR BEER: Yes, I haven't any further questions. Thank you.
 9 THE CHAIRMAN: Thank you.
 10 Mr Davies, do you have any questions?
 11 MR DAVIES: No thank you, sir.
 12 THE CHAIRMAN: Ms Whyte?
 13 MS WHYTE: No thank you, sir.
 14 THE CHAIRMAN: Thank you.
 15 Thank you, Mr Fernandes, that is the end of your
 16 evidence. You are now free to go.
 17 **A. Thank you very much, sir.**
 18 MR BEER: Sir, that is all of the evidence for today.
 19 THE CHAIRMAN: Right. 10.30 tomorrow morning.
 20 MR BEER: Thank you very much, sir.
 21 THE CHAIRMAN: Thank you.
 22 (3.56 pm)
 23 (The Inquiry adjourned until 10.30 am the following day)
 24
 25

Page 170

1
 2
 3 I N D E X
 4
 5 MR DAVID CLARK (sworn)1
 6 Questions from MR BEER1
 7 Questions from MR STRAW99
 8 Questions from MR WEATHERBY101
 9 Questions from MR DAVIES110
 10 Questions from MS WHYTE120
 11 MR ROCQUE FERNANDES (sworn)135
 12 Questions from MR BEER135
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

Page 171

1
 2
 3
 4
 5
 6
 7
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

A				
A/26 122:14	18:24 19:2 20:19	advanced 103:17	annual 140:2	24:24 25:13 65:13
A11 79:22,22,24	22:8 43:8 44:13	adviser 55:23 56:9	answer 14:17 15:14	65:24 118:11
80:6,7	52:11 55:10,12,14	56:10,11	15:16 17:3 19:1,4	131:6 132:2
Aaron 18:12 20:19	82:18 89:7 121:21	afraid 59:7,11	19:21 22:4 25:13	apparent 28:17
20:20,22 21:2	121:22,24	afternoon 78:18	25:21 28:21 38:12	apparently 97:12
22:7 99:12	actions 19:16 22:23	99:5 131:5 144:17	49:21 57:2 78:11	97:20 116:17
abandoned 89:15	25:15	AG 125:19	81:8 86:5,16,25	appear 75:19,22
able 66:12 111:10	actively 17:23	ago 27:9 29:5,7	87:1 90:7 106:4	79:21 92:15 103:7
111:13 121:19	activities 150:25	83:11,15 146:2	110:4 130:15	104:22
143:20	164:20	151:12 168:4	131:22 141:5	appearance 31:12
absence 126:16	activity 91:7 92:18	agree 21:14 35:24	antecedent 87:23	appeared 17:19
143:15	118:7 126:7,11	38:23 40:2,18,21	antecedents 85:15	63:13
Absolutely 56:21	145:5,7 157:8	48:8 49:15 50:1	Anthony 18:12	appears 73:6,22
106:1	159:2 160:19	52:17 53:19	20:6,10 49:25	110:23 152:10
abstraction 138:18	161:23 163:19,22	117:13,14 120:4	50:23 51:9 53:14	153:15 158:22
accelerants 125:10	167:22	170:2	54:21 57:20,24	application 105:5
accept 80:3,15	acts 149:4	ahead 141:17	60:12,23 62:14,17	applications 105:2
157:22	actual 26:2 64:15	air 97:23	62:21 63:12 67:1	105:3
acceptable 37:11	73:25 76:4 103:2	alight 123:24	67:4,8,19,23 69:3	applied 29:12
access 12:8,17,18	114:8,25	allegation 75:1,25	69:3,8,15 70:19	apply 77:12,16,19
40:18,22 41:7,11	Adam 99:3	alleged 50:15 66:25	70:25 71:13,24	appreciate 78:15
41:17 52:16 53:15	added 11:21 87:25	67:18 68:23 71:24	74:4,6,11 75:25	79:5 84:5 103:17
54:23 55:6 60:13	addition 38:23	71:25 73:1,3	77:13 81:18 82:1	appreciated 78:23
78:20 81:21 83:21	address 44:15 89:9	75:16	82:7,9,11,15,22	approach 82:14
84:4 85:4,9 92:7	115:18 116:4,6,7	alleyway 115:23	83:2,14 84:10,19	145:18 158:5
117:16 136:13	116:11,15 119:5	allow 79:3	85:9,10,13,23	approached 51:5
148:10,24	123:4 131:25	alluded 55:5	86:7,21,23 87:3,7	April 2:21 3:6 4:4
account 31:18,23	132:9 149:10	alluding 62:5	91:5 95:5,11,14	84:20 91:12 123:2
36:9 37:5 38:13	addressed 119:14	alongside 86:8	97:19 99:12 100:1	123:11,22 124:22
38:24	addresses 167:20	altered 120:12	100:9,15,24	124:25
accuracy 30:19	Adelphi 76:14	amended 127:9	101:19 106:17	area 9:23 84:21
31:15 102:13	115:12 116:8	amount 101:8,9	107:11 108:23	89:15 93:1 112:9
accurate 163:25	Adequate 27:13	amplifying 111:7	113:14,15 115:17	114:9 115:19
170:2	45:25 46:12,16,18	analysing 8:9	118:22 119:20	116:2 152:9
accurately 40:19	47:1,14 92:19	Anderson 60:24	120:2 125:20	160:20 163:19
40:23 79:6,8	128:18	61:17 62:2,23	Anthony's 99:4	164:20 168:15
accused 61:18 82:2	adhering 130:9	63:8,11 67:2,5,14	104:19	areas 45:3 90:21
acquittal 70:5	adjourned 170:23	67:19 68:16,20	anybody 98:11	99:6 110:12
acquittals 111:23	adjournment 58:19	69:2,3,15 70:2,6	anymore 79:22	125:12
117:9	66:5 98:23 135:2	71:16 82:2 84:23	anyway 131:11	arguing 100:14
acquitted 92:9	Admittedly 160:13	91:10 112:7	154:13	arises 126:15
act 76:1 142:6,23	adopts 79:14	115:17 123:3,4	apart 71:6 89:18	arising 55:8
143:6	adult 29:15	124:25 125:2	apologies 65:16	armed 17:23 49:20
action 16:22 18:16	advance 130:10	Anderson's 123:2,4	66:7 72:21	114:1,4 118:24
	134:18	Andy 16:1	apologise 22:5 23:1	119:22 120:9

124:23 168:11 armour 119:4 124:2 aroused 9:23 arrangements 134:11 arrest 55:6 57:14 61:22 76:15 89:13 91:12 114:15 118:1 127:12 128:7 arrested 47:8 50:11 51:20 52:9 57:21 57:25 58:3,5 62:14 64:3,6 76:23 82:16 84:10 84:13,23 89:22 90:2 91:11 92:8 125:1 126:24 arrests 25:5 53:12 54:20 60:10 61:25 61:25 62:1 arrived 116:19 123:15,21 Ascot 34:21 35:12 43:6,13 45:2,10 45:11 63:10 83:13 84:19 88:12 90:18 91:4 92:15,16 122:14,20 Ashton 123:8 124:24 aside 4:24 42:15 asked 1:11 7:16,24 26:21 28:24 29:6 36:18 37:7 41:9 66:11 82:4 99:7 109:3 121:2 122:9 135:25 136:1,14 143:15 146:24 147:2 151:5,7 168:1 asking 20:8 59:15 85:18 99:17 106:15 107:2,7	109:2 110:10 131:7,8 148:22 asks 144:21 167:18 aspect 134:10,10 assess 113:7 119:20 165:2 assessed 133:6 assessment 119:12 120:8,13 assistance 2:2 assisted 1:24 associate 22:15 82:19 86:9 89:22 92:17 113:20 associated 42:3 112:10 associates 45:6 47:8 51:22 82:13 90:24 92:8 associating 91:5 association 51:12 52:2,19 59:21 78:20 82:25 113:8 115:1 assume 160:15 assumed 143:2 assumption 130:17 attached 6:11 15:18 attaching 77:3 attempted 67:18 68:23 attend 33:1 attendance 33:4 attention 58:22 attentive 31:14,16 attract 130:25 134:17 attribute 24:21 Audi 78:18 94:3,6 94:12 96:15 97:4 97:5 August 122:4 August/September 6:7	authored 4:10 authorisation 105:5 authorised 106:23 authority 33:4 120:7,10 automated 166:12 available 153:12 Avenue 162:1 aware 1:13 11:2 16:6 17:3 64:6 108:6 166:17 168:2 axe 116:2 Azzopardi 93:3 <hr/> B <hr/> B21 159:1 back 7:8 21:25 26:17,19 30:5 36:11 40:16 41:10 42:7 47:9,21 56:1 56:13 60:1,2 63:4 65:19,20,21 68:9 70:1 72:9,15 73:10,15 75:8 80:9 93:9 96:8,24 96:24 97:13 100:21 107:2 113:4 126:12 133:22,24 140:11 140:12,20 142:18 146:2 162:24 169:16,25 background 5:4 131:17 137:15 bad 32:1 bag 89:25 116:7 168:21 bags 123:3 balacavas 90:1 119:4 bald 130:15 ballpark 101:7 bank 46:2 51:21	52:14 53:8 93:2 113:25 114:2 161:24 banknotes 114:20 114:23 115:1 banks 17:24 34:6 45:3 51:15 52:5 53:17 54:24 61:1 61:15 90:20 based 111:2 113:6 119:19 basically 13:1 149:1 150:8,15 basis 53:22 76:5 163:1 bear 42:14 60:6 108:9 Beer 1:8,15,22,23 1:23 4:2,4 13:24 23:21 54:1 56:6 58:14,21,22 59:3 59:6 64:24 66:2,7 66:10,15 72:11,15 72:20 73:17,20 87:16 93:11 96:6 97:2 98:9 99:7 106:14 107:2,5,13 108:2,14 109:2 116:24 129:15,16 129:18 130:4,6 132:15,18,21 133:4,17,21 134:22,24 135:4,5 135:10,11,11 136:19 154:14,18 166:8 170:8,18,20 171:6,12 Beer's 130:15 beginning 7:24 170:4 begins 155:22 behalf 1:24 110:10 135:12 belief 5:1 137:6,12 believed 45:3 90:21	112:19 168:11,16 bells 125:25 best 5:1 28:12 36:9 73:11 137:5,12 162:22 better 30:18 79:2 110:15,18 120:25 133:23 big 43:23 89:2 bigger 15:21 bin 168:19 binder 2:8 93:11 binders 2:3 bit 9:16 28:10,11 28:13 29:1 31:10 48:22,22 53:24 99:20 107:1 127:19,23 141:14 141:16 147:23 black 14:18 43:23 55:21 89:3 94:1 155:22 168:19 Blackpool 45:3 90:21 bland 35:25 blank 44:6 105:17 bluntly 131:20 Blythe 118:15,16 118:21 119:2,11 board 97:5 body 119:4 124:2 bold 39:16 Bolton 34:2 35:11 43:9 48:1 50:25 53:8 55:11,12,16 56:20 57:16,21 59:18 81:13 82:7 book 96:12 139:1,2 139:4,6,8,12,14 139:24 145:14 151:2 155:15 157:2 169:16 books 139:10 Boothtown 94:2 bore 125:7
---	---	--	---	--

borrow 64:22	144:23	cadre 12:11 103:20	102:19 103:2	120:16 127:17
boss 12:18 15:15 88:12	briefings 109:19 122:2	calculations 27:12	138:20 151:16,17	128:9,13,20,24
Botany 45:15,22	briefly 64:19	call 151:9 162:6	151:18	129:11,19 130:4,7
46:15,17 47:3	Brierley 151:23	called 12:3 47:14 78:12 89:22 102:4	cash 6:3 17:25	130:21,23 131:7
63:8 88:11 91:22	bringing 11:11	122:16 126:16	67:16 112:25	131:19,24 132:3,7
91:23 92:13,14	broad 136:10	148:10 153:14	114:18 116:8	132:15,20 133:3
93:5	147:23 149:21	calls 155:12,12	119:3 131:21	133:16,20,22
bottle 125:9	broadcast 96:13	capability 48:14,21	133:2 152:17	134:3,5,8,21,25
bottom 24:11 50:21	97:20	52:15 55:17,22,24	157:4,9 159:2	135:4,7 136:14
52:1 60:7 61:21	broader 148:2	57:9 76:24 78:19	165:4 166:5	154:13,17 166:6
81:23,25 124:9	broadly 89:19 97:9	81:20 119:15,21	cashpoints 166:13	170:9,12,14,19,21
125:8 144:4	broke 98:19	119:22 120:2,8,13	catch 71:10	chairman's 73:19
166:20	broken 21:23	capital 12:4,5 13:7	categorically 82:23	chance 29:20
boxing 21:18	brother 50:23 51:9	13:8,8 148:11,11	caught 103:15	change 15:7
brackets 39:15	99:4 127:24	capture 162:22	cause 1:12 86:22	changed 128:16,22
Bradley 18:13	128:11	car 9:23 35:8 46:1	caused 38:1	characterised
20:19,20,22 21:2	brothers 18:12	88:19 92:21	causing 129:3	131:4
22:7 99:13	22:9 99:12 112:8	104:20 118:23	Cavanagh 67:12	charge 160:24
branch 125:23	brought 11:10	123:18,22,24	cent 141:8 158:19	charged 33:19 50:8
break 53:23 58:15	28:25 78:5,15	careful 29:8 31:12	161:6	50:22 51:8 59:17
58:17 98:12,21	136:19	31:13	centre 86:8 159:3	72:2 82:17 90:3
134:22,24	Broughton 44:8	carefully 53:23,24	certain 9:1,23 31:5	90:15 112:1
breaking 168:17	89:6	107:1	113:12	116:22 118:9
brief 47:21 76:18	building 17:24	Carl 118:23	certainly 16:25	charges 117:5
briefed 30:18 37:5	150:20 161:24	carried 6:16 9:12	25:7 26:19 30:12	133:12
37:6,14,18 85:19	165:8	62:15 92:17 98:18	31:14,16 37:22	chased 44:8 89:6
103:11,12,20	buildings 165:7	carry 113:25	58:15 98:20	116:10
briefing 20:24	bumped 152:19	134:23 145:19	101:16 104:15,19	check 28:19 30:10
26:17,22 27:5,8	bundle 2:1 13:24	carrying 97:12,20	105:8	30:19 93:10
27:11,21 30:2	26:19 37:21 43:15	97:24 98:1,7	cetera 26:14	121:23 125:17
31:19 32:23 35:2	65:19 69:25 73:10	126:10	chain 8:16	147:13,13 149:4
35:4,8 36:16,17	81:22,24 102:22	cars 84:21	chairman 1:3,7,10	checked 30:7,13,20
36:22 37:8,17	110:14 119:1	Cartwright 1:25	1:16,19 4:1,3 8:13	checking 30:5
38:17,20,20,21	120:21 121:23	129:15	13:22 23:20 48:19	41:22 105:14
57:11 62:18 64:14	126:14 138:23	case 27:15 64:4	53:23 56:4 58:15	checks 148:2
75:6 76:8,22	140:21 144:2,3	113:5 117:2	58:21 59:1,5	Cheshire 136:10
77:25 78:11,19,23	154:6 158:10	127:15,17 128:10	64:23 65:6,10,14	150:16,23,24
81:16 82:10 86:10	bundles 66:12 93:7	128:12 131:9,22	65:18 66:1,3,9,13	151:9,10,14 152:7
88:4,16 102:4	120:24	132:2 133:7	72:8,13,17 73:12	152:15,16,22
103:7,18,19	burden 29:16	141:20 143:7	73:18 87:5,15	153:5,11,16 154:7
106:15,20,21,24		145:23 156:6	93:8 96:4,24	155:12,13,15
107:8,10 108:17	C	164:24	98:11,16,18,20,25	156:25 157:3
109:3,20,24 110:2	C 12:5 148:12	casebook 23:8,16	102:25 106:19,23	158:2,6,25 159:3
119:13,24 120:1,5	C4 124:1	23:22 96:10	107:22,25 108:10	161:24 164:18
			110:7 117:15,17	166:5 167:15

168:10,12 chief 151:22 168:9 Chris 151:23 chronology 6:20 7:3,9 8:15 9:7 10:18,23 11:1,3,9 11:21,23 12:4,25 13:14 14:1 15:11 16:6 17:14,20 25:10 38:17 46:16 63:2,9,13 77:23 78:3 84:25 88:17 99:8,15 148:11 circle 44:2 circs 9:21,22 circumstances 118:10 Citroen 123:13,23 123:25 124:1,4,11 124:16 125:4 civilian 7:16 clarifying 123:20 Clark 1:9,18,19,23 30:24 99:3 110:10 117:1 125:19 129:21 132:1,6,23 133:10,21 134:4,5 148:19 171:5 cleaner 38:9,10 clear 3:24 21:17 27:20 103:6 120:19 121:20 134:1,14 141:5 clearly 134:2 165:23 client 1:4 CLIO 16:23,24,24 17:2 25:16 26:14 close 16:9 18:11 44:13 47:8 89:7 92:8 99:11 closest 36:6 closing 93:2 131:25 clothing 94:24 95:3 95:7 97:10	clue 144:1 co-accused 60:25 62:19 82:19 83:6 83:12,15 84:2,3 84:15 113:21 114:9 coat 150:20 cocaine 22:15 Colin 18:21 collating 8:9 colon 54:8 column 80:6 169:4 come 7:8 15:5 20:12 26:21 37:1 44:23 45:13 48:6 59:6 79:11 82:11 95:6 97:13 99:18 99:24 100:16,17 118:20 133:22,24 138:22 149:8 150:2,4 152:14 153:8 154:3 155:17 157:21 164:10 comes 29:4 63:9 104:1 162:24 coming 8:20,23 63:3 132:13 147:1 150:3 commander 30:18 49:19 64:9 78:24 commander's 97:3 commanders 122:3 commenced 91:4 comment 95:15 98:6 119:7,23 131:24 commercial 112:24 commission 17:23 commit 18:10 34:6 51:15 53:17 54:24 61:15 90:2 99:10 100:8 113:21 119:22 120:9 168:19	committed 73:1,3 75:17 committing 45:6 51:14 52:4,5,21 58:4 59:23 90:23 91:11 common 48:7 162:1 communicate 88:8 communicated 9:2 company 53:13 54:21 57:15 60:11 61:22 114:9 compare 37:21 66:12 132:14 comparison 42:17 completed 76:20 116:3 153:14 166:21 completely 59:1 100:12 119:2 129:23,23 complying 130:11 computer 169:3 concealed 89:25 concerned 11:16 14:20 49:25 89:1 155:8 concerning 22:23 49:24 77:13 81:13 152:17 157:9 159:1 165:4 concerns 141:22 concludes 70:3 conclusion 55:24 57:10 132:13 conduct 32:16 conducted 93:17,20 108:4 123:7 131:16,16 conducting 123:12 confident 29:17,19 confirm 9:10 22:8 46:10 68:15 136:14	confirmed 20:5,10 confusion 127:23 129:3 connected 9:25 42:2,3 connection 24:4 82:7 consciousness 22:18 consequence 29:14 consider 132:5 consistent 97:7 conspiracy 55:6 66:24 69:7 70:18 71:1 72:4 75:20 77:4 78:22 84:11 90:2 113:21 conspire 76:3,4 constable 168:9 Constabulary 152:16 constant 113:20 constantly 87:23 113:7 consult 35:18 consulted 143:12 contact 20:13 136:9 152:7,15,22 153:4 153:5,11 155:15 156:25 157:3 158:6 160:5,8,10 160:11,15 161:2 163:4,20,24 164:1 165:19 166:1,2,5 167:9,11,14,17 168:5 contactable 156:2,4 161:13 contacted 151:22 158:18 160:13,16 contacting 151:23 158:14 167:12 contacts 167:10 containing 90:1 116:7 125:10	content 159:20 contents 4:25 81:10 137:4,11 context 32:15 82:6 107:3 112:14 114:23 127:14 157:25 165:11 continue 47:12 118:12 continued 124:15 124:22 161:22 continues 59:20 convenient 58:14 conversation 33:10 46:8 47:2 49:3,4,9 49:23 52:7 145:14 150:17 155:10 156:12 157:25 159:9,18,20 167:3 167:6 168:4 169:6 169:10,12,15 conversations 157:24 convicted 33:20 47:10 50:3 90:3 90:11,13,15 92:9 conviction 92:13 convoy 124:3,6,14 Cook 161:25 copies 136:1,20 COPU 8:11,12,13 8:23 13:2,10 14:9 17:16 copy 3:12,22,23 23:16 33:17 38:4 59:1 65:18 110:15 110:18 120:25 136:5,25 core 16:2,3 17:11 101:3 Corkovics 112:15 112:22 correct 2:11,14,19 3:5,9,19,22,25 4:5 4:8,14,19,22 5:9
--	---	--	--	---

6:10,21,25 7:2,12 7:18,20 8:25 9:15 11:17 13:15 15:6 17:9,21 18:8,14 23:12 24:17 25:2 26:23 27:4,10,12 27:17 28:2 32:3 33:14,22 34:4,22 35:20 37:24 38:25 39:18,21 41:13 43:7,14,25 44:3 46:6,19 48:5 50:7 50:10,13,18 51:7 53:10,18 54:14 55:1 58:13 59:10 60:16,21 61:3 62:9 64:11 69:5 69:17 72:1,6,24 74:8,11 78:8 79:4 79:8 81:14 93:16 93:18 94:4,8,11 94:13,17,20 95:2 98:8 99:19 102:5 105:12 110:25 112:3 113:1,10,24 114:7,21 115:13 115:24 116:5,9,13 116:21,25 117:7 120:8 121:15,17 123:9 124:5,8,17 124:21 125:2,6,11 136:15 137:3,20 138:2,6 139:3,5 139:16 140:8 146:14 152:13 154:24,25 155:3,4 155:5 159:12 161:7,16 corrected 104:13 counsel 131:1 134:16 count 66:22 67:4,8 67:12,14,18 68:3 68:3,23,25 69:7,9 69:14,18,23 70:5	70:8,14,18,22 71:5,8,16,19 73:6 73:22 74:2,24 75:22 counts 68:1,16 75:19 couple 55:8 95:25 104:3 127:5 139:19 coupled 131:21 course 10:6 57:3 64:23 78:7 114:11 138:18 court 69:22 70:2,15 70:21 71:1 118:4 118:10 courteous 133:24 courtesy 1:6 Cousen 7:15,19 9:6 11:6 12:18 15:25 16:6 17:7 33:2 125:18 138:8 141:12 145:11,23 149:17 151:21 152:10 155:16,25 156:6 158:2 160:25 162:21 163:6 164:9 169:14,17 170:3 Cousen's 96:9 125:13 139:4 151:17,18 157:2 165:3 cover 130:17 132:18 138:7 139:13 149:17,19 149:24 150:1 CPS 128:6 created 14:3 25:15 crime 6:2 34:19 36:2 39:2,16,17 39:20,23 40:4,13 40:19,22 41:2,7 41:10,11,17,19 42:2,3 44:5 45:4	46:3 52:7,10 54:12 69:21 72:22 74:13 75:3,14,16 76:9,10 77:1 90:22 112:9 113:8 119:8 crimes 33:11 34:13 34:14 35:8 36:23 39:3 41:2 42:6,13 49:10,11 62:19 77:4 criminal 22:15 33:5 48:16,24 56:14 92:17 criminality 112:11 112:21 cross 41:3 crossed 3:7 127:25 crowd 122:6 Culcheth 45:3 84:21 90:20 152:8 159:3 160:19 162:2 163:19 168:15 Cullen 91:10 92:9 92:16 123:6,7 124:25 Cullen's 92:17 currency 114:4 custody 147:18,22 cut 13:6 14:9 142:5 cutting 142:5 CVIT 168:23 CVITs 152:8 157:5 <hr/> D <hr/> D 171:3 D/774 121:23 daily 9:13 10:24 dance 14:17 danger 40:3 data 40:17 date 3:23 8:18,19 13:11 14:13 58:23 59:10 69:10 111:5	120:20 121:10,13 137:1 dated 2:9,13,20 3:3 3:6,13,17,20 4:20 37:23 59:4 93:12 121:2 122:9 135:14,20 136:23 144:10,13 dates 28:10,13 29:10,22 30:7 36:4 89:18 143:24 159:4 David 1:9,18 7:25 17:22 18:10 20:6 21:19 22:14 33:5 62:18 67:2,5,9 69:8,14 70:22 71:18 76:23 78:17 78:19 82:10,16 83:1,8,9,21 84:10 84:13,15,20 85:5 85:15 86:8 87:4 88:18 92:16,17 99:10 100:7 115:17 120:1 127:24 128:10 171:5 Davies 110:7,8,9,10 117:16,17,19 120:15 129:7 130:8,15,22 131:2 131:12,20 132:2 132:10,18 134:1,3 134:9,20 170:10 170:11 171:9 Davies's 130:5 day 20:15 21:17 37:25 38:2,2,15 38:19 39:1 47:24 53:2 67:12 69:11 76:12,15,19,24 77:1 84:22 85:19 86:3 102:9,14 104:9 107:24 115:16 117:25	118:1,7,8 123:5 124:9 125:2,4 126:22,24 140:11 140:12 143:23 146:20 147:5,12 147:19 151:6 154:5 161:13 162:18 166:13 170:7,23 day-to-day 163:1 days 24:6 114:16 115:4 140:16,17 141:6 146:19 156:1,11 DC 16:1 28:23 99:3 108:22 109:16 110:10 125:19 132:23 133:10,21 148:19 153:22 157:14 158:9 DCs 17:8 138:4 deal 2:18 48:14 128:14 155:13 dealing 76:15 136:7 136:9,12 138:20 148:8 150:4,22 151:13 155:9 dealings 88:3 dealt 6:3 142:1 Deb 156:22 161:1 163:21 Debbie 7:14 12:18 150:15,22 debriefed 143:22 December 135:20 135:21 137:9 decide 16:7 decided 133:18 decides 79:13 decision 8:15 19:5 21:5 26:5 29:1 49:19 70:15 79:2 117:4 129:8 143:13 decisions 7:6
--	--	---	---	---

143:11 defendant 74:5,17 defendants 74:19 111:21 definitely 12:20 21:2 29:24 90:15 129:2 169:1 definitive 168:21 deliveries 165:4 delivering 165:10 delivery 159:2 166:12 deny 9:10 department 119:2 depending 10:15 deploy 79:3 144:19 deployed 146:23 150:6 deployment 103:21 deputy 7:14 19:6 141:19 142:2,6,10 143:5,12,14 148:19 161:12 168:9 describe 149:25 describing 49:13 desk 64:22 146:6 desks 16:17 despite 44:14 89:8 131:15 detail 7:8 38:23 45:13 99:20 117:20 122:21,22 141:14 149:24 detailed 38:13 64:1 143:13 159:21 162:20 details 28:20 93:22 122:1 133:14 161:2,17 163:20 detective 118:4 120:15 138:1,7 160:3,12 161:1,9 161:9 develop 15:9 16:15	16:21 17:6 26:6 79:9 developed 6:2 16:8 26:1 49:10 84:19 developing 23:9 25:19 developments 144:22 DI 7:15,19 9:6 11:6 15:25 16:6 17:7 32:21 33:2 96:9 139:4 140:4 145:11,23 149:17 151:17,18,21,22 152:10 154:22 155:25 157:2 160:25 163:6,16 163:21 165:3 166:3,21 Dickinson 2:22 158:15,16 163:15 Dickinson's 4:24 died 24:6 25:4 86:4 126:22 differ 34:17 difference 38:22 89:18 90:7 different 2:17,18 2:21 34:20 42:18 61:6 79:14 113:8 119:2 136:7,22 165:7 170:6 differently 65:6 142:2 difficult 49:17 difficulty 1:12 dig 13:18 Digger 144:20 direct 11:22 56:1 80:1 148:7 directed 71:23 110:23 111:23 117:9 direction 70:6,23 71:3,9,15,17,21	73:19 directly 14:19 directs 15:15 discharge 82:21 84:16 discharged 48:17 48:25 51:2,7 55:18 56:15,24,25 57:5,8,11 70:22 84:24 91:12 disclose 12:7 disclosure 6:15,17 6:24 12:6 17:1 80:24 discover 54:15 discrepancy 140:15 discrete 125:12 discussed 8:11 16:18,19 21:3 22:1 26:5,8 discussion 21:6,10 21:15 26:9 47:13 dismiss 117:4 dismissed 133:12 disproportionate 130:22 dispute 134:3 disrupting 157:8 disruption 152:8 152:16 157:4 164:22 disseminated 77:9 77:13,17,20 163:14 disseminating 7:6 dissemination 26:7 78:13 distinctly 150:19 divider 38:5 56:2 80:1 166:6,8 division 5:8 33:6 51:12 52:2,20 53:13 54:21 57:14 59:21 60:11 64:5 divisional 5:17,21	29:14 document 6:18,19 11:8,24 12:3 14:2 14:10,23 26:24 35:21 78:13 108:11 121:1,9 125:13 148:17 documents 5:7 6:17 14:2 26:20 40:12 49:5,15 doing 10:7,11 12:6 20:14 24:5 29:5 31:6 41:16 50:14 83:24 106:3 142:13 147:7,19 150:12 152:20 doubt 79:5 113:7 160:21,22 161:15 162:5,10 dozen 39:20 draft 135:22,24 drawn 33:17 34:5 58:22 drive 12:14,14,15 12:16 30:22,22 148:18 driver 78:18 94:15 97:5 124:15 driver's 94:21 124:12 driving 21:21 94:2 126:9 dropped 68:21 69:4 69:10 drove 123:25 124:3 DS 7:14,17 14:11 14:14 15:25 16:1 17:8 32:22 142:23 144:15 145:19 151:13,16 152:7 152:15,24 154:3 156:15,24 162:8 163:6 164:3,11 DSs 138:4 DSU 107:17 108:5	108:17 109:9,17 109:24 110:3 144:16,22 145:2 166:23 167:22 DT 125:19 due 8:22 117:5 133:12 dug 39:1,5,8,10 54:13 duplicate 4:17 duplicated 10:12 duplicates 4:24 duplication 4:1 duration 11:15 duties 142:6 143:18 duty 32:25 141:6 150:6 155:9 156:1 156:8,11,14 161:3 161:8
				E
				E 171:3 E/264 110:15 E/373 110:15 E/38 120:24 earlier 31:21,22 106:6 107:16 130:8 131:2 132:11 157:24 158:1 early 150:8 156:12 165:3 easier 42:16 46:21 easy 25:18 effect 86:13,17 113:2 effectively 9:13 14:2 16:12 18:6 31:4 33:17 76:11 111:20 154:7 eight 24:11 137:1 161:11 eight-month 69:11 either 24:21 30:11 46:23 49:16 51:25

53:20 100:18 116:14 127:9 153:4 154:3 164:3 165:7 elaborate 36:23 46:9 electronic 13:5 17:2 105:4 110:15 electronically 13:10 Ellamsbridge 125:22 Ellis 62:23,25 63:6 63:12,15 67:5 71:5,8 112:7 115:18 116:3,10 Ellison 20:24 26:18 30:25 31:1 33:3 39:3 40:5,20,24 41:6 46:11,25 47:13 48:21 49:9 50:2 51:17,24 52:19 53:20 54:12 54:17 56:19 62:8 63:16 67:1 69:15 75:6 76:8 77:14 78:14 82:11,15 83:3,23 86:6 90:5 90:17 91:14,21 92:19 102:4 103:8 107:8 109:18 112:13 119:25 Ellison's 43:16 48:4 55:9 79:24 88:24 89:2 email 17:2 127:2 128:16,22,23 144:7,8 145:4 emailed 126:21 emailing 145:1 emails 23:2,4 127:23 128:15 136:12 137:10 144:7 emphasise 130:8	enable 79:2 ended 64:10 141:2 ends 34:6 70:5 engaged 112:20 enquiries 141:25 162:18 166:16 enquiry 21:24,25 entail 12:25 enter 116:4 entered 22:18 124:3 entering 34:6 51:15 52:5 53:17 54:24 61:15 entirely 103:6 entries 14:7,9,18 138:19 146:22 155:14 entry 13:11 71:2 89:21 96:9 97:3 104:4,6 105:15,23 139:25 146:7 151:2,20,24 152:4 152:23 154:10,15 154:17,20 155:21 155:24 157:2,17 164:1 166:2,10,11 166:18 168:6 169:2,10 170:4 equipment 116:11 especially 40:25 essence 113:1 established 42:12 estimate 101:6 et 26:14 Evans 107:16 108:5 108:21 Evans's 108:1 evening 88:20 102:18 152:1,2 event 24:18 104:20 129:13 events 18:4 21:19 27:11,25 32:6,11 32:13 93:15	112:12 126:25 eventually 92:15 evidence 27:18 40:12 53:3 76:5 88:16 99:25 102:3 104:21 106:6 107:16,24 113:15 114:25 115:1 116:16 117:3,6,11 129:22 131:2,3,14 133:13 134:6 170:16,18 evidential 40:15 41:15 47:23 53:1 evolved 92:13,14 exact 163:8 164:2 168:4 exactly 30:20 111:4 146:2 164:25 examine 64:18 example 13:6 17:13 22:7 36:2 63:7 147:25 149:8 exercise 130:22 exhaustive 131:15 existence 81:3 existing 81:4 expanded 50:19 53:1 expected 130:19 experience 30:23 33:7 explain 25:25 46:21 81:21 99:20 106:25 125:25 132:11 138:22 141:14 149:19 162:16 explained 115:6,8 155:9 156:13 162:23 169:13 explaining 108:12 explanation 46:20 49:8 66:13 117:19 130:14	explored 81:15 expressly 52:18 extended 112:2 156:8 extent 36:11 76:7 113:12 130:18 132:22 extra 72:17 extracted 139:4 <hr/> F <hr/> F/425 96:19 face 35:21 49:15 52:17 53:19 130:12,24 131:8 139:13 fact 21:19 34:10,13 79:24 103:11 107:7 121:3,20 131:20 132:25 134:5 141:2 142:23 145:22 facts 20:16 failed 56:22 fair 18:2,4 29:23 36:8 101:24 109:23 127:12 fairly 145:20 fairness 128:2 false 125:7 familiar 119:14,15 family 92:6 112:16 far 12:19 32:7 81:3 95:12 104:22 155:8 167:9 fast 31:7 fatal 32:14 fault 66:10 73:18 101:21 featured 124:25 February 1:1 20:2 23:10 25:20,23 26:4 81:4,7 102:6 104:21 105:11,15 105:20 106:2	107:24 125:18 fed 21:25 Feel 1:19 feet 146:6 Fernandes 135:5,6 135:8,11 140:4 151:19,22 154:22 160:4,12 163:16 166:3,21 170:15 171:11 FIB 19:19 file 13:17 64:19,25 65:2,6 70:16 96:25 110:15 117:8 files 1:12 2:3 128:23 filled 38:16,18 122:7 165:20,23 final 119:12 finally 71:18 126:14 financial 92:5 159:2 168:18 find 22:9,10 43:16 65:19,20 71:23 99:23 135:14 147:21 160:5 finish 87:15 finished 129:23,23 140:13,23 Finishing 139:1 firearm 45:16 51:22 76:17,25 83:6 84:11,14 91:12,24 116:7 117:24 118:8 firearms 30:18 33:3,11 45:7 48:18 49:1,18 52:16 55:18 56:15 56:23,24 57:5,7,7 57:10 61:1,16 62:15 64:9 76:25 78:20,23 79:3
---	---	---	---	--

81:21 82:21 83:20	following 46:20	friend 18:11 99:11	Gerrard 168:9	34:10,13 42:7
83:22 84:1,4,17	47:17 58:23	front 1:25 94:15	getting 21:11 52:13	48:14,20 51:10
84:23 85:4,9,18	102:14 144:18	97:5 107:21	85:2,3	59:3,9,13 60:2
90:25 91:17 92:7	170:23	120:21 125:10	gist 14:25	65:20 66:16 68:9
97:2 103:20	follows 32:24 54:5	135:12	gisted 14:25	70:1,21 77:1 80:9
106:23 109:3,6,20	144:19	FRU 33:8	give 20:24 30:21	101:10 113:3
110:11 119:13,18	foot 47:5 59:15	fruits 10:17,24	32:6 40:8 47:22	120:21 122:19
119:22 120:2,7,9	80:9	full 38:21 142:3	49:14,22 65:16	124:9 125:16
122:2 159:4	foothills 155:18	143:13 146:18	72:19 73:12 77:15	126:14 134:6
firearms/commit...	force 6:6,8 34:18	147:8 148:23	78:11 88:16,16	141:17 150:21
53:16 54:23 60:14	154:7 157:18	fuller 37:1 38:13	101:6,7 105:16	156:15 161:12
first 15:11 18:1	158:15 163:14	40:11 47:22	107:23 119:25	164:23 169:15
31:18,22 33:16,18	forensically 125:9	fully 143:12	122:15 129:13	170:16
33:23 36:8 39:15	forget 112:23	function 7:4,9 13:1	141:5 142:13	goes 65:24,25
42:5,18,24 47:5	forgotten 131:3	15:8 143:5	145:21 153:6	151:24
48:22 50:21 55:21	form 13:4	functions 5:13,15	169:20	going 11:12 15:15
57:5 60:19 61:7,9	forming 55:23	138:7	given 30:1 78:5	16:20 19:23 26:20
66:16,24 71:2	forward 117:2	furniture 89:25	79:25 102:3	28:4 30:5 36:24
72:15 75:9 89:3	forwarded 32:21	further 51:10 80:12	103:17 104:22	42:17,18 76:11
100:20 108:7	forwards 149:16	92:2 107:4 109:8	106:6 107:7	93:1 95:6 96:1
110:12 111:1	Foulkes 32:21	110:5 129:14	117:11 121:9	103:15 107:19,20
113:16 127:19	found 44:13 89:7	155:12 156:3	129:9 132:9,22	121:3 129:12,24
134:16 135:22,24	89:25 114:18	166:18 170:8	133:9 143:5	132:5 136:14
136:23 140:12	116:6 120:23	fussy 31:10	157:11 162:7	146:2,25 147:15
146:20 147:12,22	121:22 149:9	FWIN 104:20	167:13 168:8,12	150:10,18 152:2,2
158:6 160:6,8,10	four 6:22 57:19		giving 28:12 76:22	152:21 153:17
160:15 161:14,15	71:5 72:15,18		88:4 118:22	154:20 155:11
167:16	91:9 116:19		165:13 169:22	156:25
firstly 130:15	132:22 133:10	G	Gloucester' 108:24	Golborne 124:11
156:24	153:25 157:14	G2/1168 64:20	gloves 95:5,6,7,11	golfing/driving
five 5:23 11:19 16:3	164:7,18 167:20	G2/1168B 64:24	95:13,14,16,20,22	124:19
17:7,9,11 24:6	168:7 169:23	G2/1282 75:8,9	96:16,17 97:14,18	good 1:4 64:12 72:9
27:9 30:15 67:1	four-count 68:13	G2/1350 72:7	97:19 123:22	99:5 119:24 133:7
67:24 72:18 93:25	fourth 45:25 91:3	gain 92:7	124:2,20	136:15
111:25 134:25	167:11 168:5	gained 109:19	GMP 9:20 10:3	goosed 72:21
146:2,19 151:12	fourthly 92:19	gang 168:11,13,14	11:13 24:4 32:9	grade 29:1
164:21 168:4	frankly 162:11	168:17	159:1 160:12	graded 77:10 79:15
flagged 133:18,19	free 1:19 134:6	Gary 16:1	166:15,22 167:14	79:20 80:12,15
flatback 124:6	169:5 170:16	gathering 7:22	168:13	grading 77:12,16
flick 96:8	Friday 138:24	geekily 11:12	GMP's 9:13 11:19	77:19 78:9 79:7
floater 24:20,23	139:1,14,14,17,17	geeks 10:8	32:15	80:6,10
focus 157:8	141:8 144:14	geeky 9:16	GMPics 30:11	Grainger 18:12
folder 23:17 102:20	145:1 146:15	general 7:21 26:21	go 4:12 10:25 12:10	19:24 20:6,10
135:13	151:21 152:12,14	generality 49:18	17:10 26:17,20	24:6,22 25:4
followed 134:10	160:16	generally 38:22	28:15 29:12,19,24	49:25 50:3,8,11
		138:9 161:12,18		
		genesis 121:20		

50:14,22,23 51:8 51:9 52:3,14 53:14,14 54:22 57:20,24 58:3 59:17 60:11,12,23 60:23 61:17,17,23 61:23 62:1,1,14 62:17,21,22 63:8 63:8,12 67:1,2,4,8 67:14,19,19,23,23 68:20,20,24 69:2 69:3,3,8,15 70:10 70:19,19,25 71:7 71:13,24 74:4,4,6 75:2,25,25 77:13 80:23 81:16 82:1 82:1,7,9,11,15,19 82:22 83:2,14 84:10,16,19 85:9 85:10,13,23 86:7 86:14,21,23 87:3 87:7 91:5 94:14 94:19 95:5,11,14 95:23 96:15 97:5 97:19 99:12 100:9 100:15 106:16,17 107:11 108:23 109:7 110:11 112:8 113:14,15 115:8,17 117:8 118:22 119:20 120:2 122:24 123:1,15,24 124:11,15,19 125:20 126:8,9,22 Grainger's 100:1 100:24 109:9 Graingers 51:14 52:21 57:15 59:23 Granby 97:2,17 grenades 119:4 group 16:12,14 21:3 44:5 45:4 46:3 52:15 83:21 84:3 85:4,8 90:22	168:15 groups 48:17,25 56:14 112:9 113:9 119:8 guided 149:12 guilty 71:2,8,13,17 71:21,24 gun 52:15 82:21 gunpoint 112:24 guns 79:3 <hr/> H <hr/> Hagan 118:23 half 72:17 halfway 39:14 53:5 53:6 103:4 113:16 hampered 162:11 hand 1:11 2:2 73:12 103:1 145:23 150:15,22 151:8 152:21 handed 96:25 162:6 handgun 116:1 handled 77:24 118:3 handover 145:11 145:25 hands 2:2 72:21 80:18 169:25 handsets 24:8,15 105:3 handwritten 58:24 65:11 121:13 hang 141:15 happen 66:9 145:22 happened 7:7 8:15 19:21 25:9 29:6 76:18 85:25 87:19 87:21 141:3 143:17,23 147:18 154:16 155:7 158:4 169:24 happening 22:10	142:19,20 143:24 144:1 164:25 happens 9:15 21:4 22:4 26:13 118:10 164:24 happy 29:10,21 hard 12:8,14,14 131:14 harder 73:13 head 101:2 headed 17:22 heading 24:20 headings 127:21 health 29:4,22 hear 154:21 heard 9:5,12 27:18 107:16 148:17 hearing 130:9 heavily 22:14 23:24 held 30:21 112:24 Helens 125:22 126:3 help 1:16 2:4,6 24:1 25:14 26:13 37:17 47:20 87:5 103:6 109:25 111:1 117:22 118:10 164:6 helpful 150:10 169:8 hidden 44:13 89:7 high 7:21 49:17 highlights 137:10 hindsight 104:2 142:1,10 hire 115:19 116:20 history 33:5 87:24 88:11 Hmm 15:4 84:7 133:3 165:5 hoicked 29:5 hold 21:11 29:4 51:23,23 80:18 holdall 123:3 holiday 162:22	Holliwell 153:22,23 153:23 154:20 156:10 157:14 158:9,25 166:1 167:2 Holyrood 73:1 home 119:5 123:2 150:10,21 156:14 156:15 161:4,12 163:6 164:23 Honour 68:6 166:7 hop 103:15 hope 1:13 hopefully 98:14 hour 124:10 166:10 hours 12:9 102:23 154:10,21 161:11 161:13 170:7 house 32:25 89:16 89:21,23 hub 16:12 Hurst 7:14,14,17 14:11,14 15:25 17:8 142:23 144:15 145:19 150:15 151:13 152:7,15,24 154:3 156:15,22,24 161:1,9 162:8 163:6,21 164:3,11 Hurst's 151:16 hypothetical 86:18 86:24 hypothetically 109:21 <hr/> I <hr/> Iain 18:20,21,23 19:3 20:13 92:14 100:16 ICI 119:14 ID 118:21 idea 32:6 38:1 72:9 136:15 identified 7:25	21:24 25:7 78:17 78:17 82:12 85:5 85:19 86:12 108:22 114:23 124:15 125:2 160:19 163:18 identify 18:16 19:3 20:19 22:8 111:10 identity 119:14 Idge 24:5,11 25:1 99:23 Idgy 18:11,16,17 18:19 20:12 99:11 99:18 100:8,11,16 Idris 32:5,8 ignore 3:1 illegible 59:2 imagine 19:8 113:5 imagining 19:11 immediately 30:14 114:8 immersion 112:8 impact 147:3,19 implicated 45:15 52:14 78:21 85:12 91:23 92:12 implies 160:7 importance 77:5 79:5 130:9 131:17 important 143:11 147:12,18,23,24 148:1 162:20 impossible 145:16 162:25 impression 134:15 improper 131:6,12 132:7 IN12 166:21 inches 65:1 incident 53:7 56:20 60:24 61:18,20 82:2 89:14 91:3 92:1 149:9 154:8 157:18 158:15 163:15
--	--	---	---	--

incidents 42:6	168:12 169:18,22	36:12 44:5,22	91:6 92:4 99:22	169:22
include 37:14 41:14	169:23 170:1	46:3 51:12 52:2,8	141:18 142:22	jobs 78:21 85:11
included 9:7 27:2	initial 167:16	52:19 53:12 54:20	162:19	106:4 112:22
80:10	initially 37:16	56:12,13 57:13	investigative 45:2	119:25 149:5
including 6:17	injury 1:10 2:1	59:21 60:10 61:22	involved 17:23 21:7	150:3,4
18:11 63:10 85:8	73:13	61:25 77:6,9,12	22:14 45:4 49:11	jog 104:4
91:5 99:11 119:13	input 7:25 79:10	77:16,19,23 78:2	57:23 63:1,11,17	jogging 97:9
123:13	inquiry 1:24 8:18	78:3,9 79:11,16	64:17 76:16,21	John 122:17
incomplete 130:16	8:18 47:11 104:1	79:20,25 80:6,12	78:21 81:17 85:11	join 5:5
inconsistencies	112:15 131:1,15	80:16 81:12 88:8	90:22 91:6 100:11	joined 5:6 9:17
117:5	134:4,16 135:12	89:3 92:23 99:7	100:21 101:3	124:6 137:16
indicated 53:15	136:2 155:1,1,6	99:14 100:12	111:3,17 113:21	joint 12:14
54:22 60:12	163:17 170:23	112:19 118:5,13	119:21 128:11	judge 68:6 71:23
indicating 48:16,24	inserted 65:11	119:3 121:25	141:24 159:5	111:20 117:4
56:14	121:14	122:2 131:18	168:17	131:10 132:14
indictment 66:11	insist 134:9	133:6 146:7,10,13	involvement 33:12	133:12
66:16,20,22 67:24	insofar 49:25	146:15,16,18,25	37:8 48:16,24	judge's 70:6,23
68:5,8,13,15	inspector 138:1,8	147:3,14 148:2,4	56:14 122:1	71:2,9,14,15,17
69:18,22,23 70:8	138:16 143:1	148:9,11,24 149:5	involves 112:23	71:21 117:20
72:2 73:7,15,23	150:2 151:22	149:6,7,12,13	involving 43:11	129:8 133:4,5
73:25 74:9,10,16	158:16 160:3,12	153:15 158:23	111:25	judicial 131:9
74:20,22 75:1,10	161:1,9 163:15	159:1 163:14	IPCC 121:4,21,24	July 3:8,13 4:10,15
75:20,23 76:5	inspectors 138:10	165:14,15 166:21	issue 42:5 100:20	4:21,25 31:24
116:23	143:8	168:21	120:20 129:18	32:2 37:23 38:3
indictments 77:2	institutes 161:22	intended 26:25	132:5,11 133:13	42:10 46:11,25
individuals 17:22	institution 159:2	27:3 168:22	issued 120:10	121:3
info 48:18 49:1	institutions 92:6	intent 119:15	issues 132:19,21	jump 15:20 101:2
inform 14:12,16	163:21 165:6	intention 87:11,12	item 17:13 25:10	160:2
information 8:23	intel 48:16,18,24	interest 143:4	99:7	jumps 148:15
12:9 19:3 20:23	49:1 89:5 144:22	interested 25:3,9	items 131:22	June 3:3 5:6 66:25
21:11 27:19 28:7	163:16	interpret 87:9		67:6 69:16 72:5
28:9,11,14,24	intelligence 6:18,19	interpreted 87:6,16	J	114:15 115:14
30:21,21 31:8	6:19 7:3,5,9,22	interrupting 111:6	Jackson 162:1	jury 71:23
39:15,19,22 40:8	8:2,4,10,14 9:2,5	interruption 66:7	January 6:9 26:18	justification 52:8
41:17,23 44:7	9:7,13 10:18,23	Investigated 90:20	27:8 32:24,25	55:4 61:12,16
49:6,14,18,22,24	10:25 11:3,4,8,19	investigating 6:11	36:22 37:5,15,19	62:4
54:5,11 64:8,16	11:21,23 12:4,22	9:18 10:9 32:13	38:11 41:5 63:16	justified 55:3
79:10 100:5 120:7	12:25 13:14 14:1	63:22 111:10	81:2 103:4 104:4	justify 36:12
125:19 126:6	15:10,10,16 16:5	investigation 6:16	106:15 108:7,14	
132:12 148:9	16:5,16,18,19	8:17,19 15:15	108:25	K
149:3,13 153:5	17:4,14,20 19:9	16:20 18:7 22:2	Jason 1:23 135:11	K/1116 139:20
155:11 156:21	19:25 20:1,4,5,8	22:18 23:13 25:8	job 15:11,13 16:7	K/1228 125:13
157:21 158:3	21:22 23:5,10	27:21 29:13 32:9	16:15 19:16 111:7	K/1244 151:18
162:6,23 164:19	25:9,20,23 26:4	32:10,15 60:25	141:8 142:4	K/1249 96:1
167:18,18 168:8	27:20 28:16 32:23	61:19 76:19,21	145:17 148:23	Karen 163:15

keen 127:11 138:13	150:24 151:2,8	88:23	33:17 34:5 43:23	longer 74:5 76:1
keep 8:18 88:7,10	153:1,7 155:7,13	Latin 46:19	55:21 72:18 89:3	98:14
keeping 154:8	156:9,10,14,16	Laughton 163:15	99:14 105:18	look 9:24 13:16
162:15	157:20,21 159:14	Leach 108:22	160:13	17:13 23:14 28:3
kept 12:13 17:25	159:15,19 160:2,8	109:16	liner 168:19	31:25 38:8 39:12
148:18	160:9 161:7,13,18	Leading 49:23	lines 21:23,25	42:5 43:15 49:25
Kev 144:19	162:9,23 163:8	leads 57:9	24:11 26:6,8	53:3 54:1 66:22
key 123:23	164:2,4,14,25	learn 138:13 143:9	151:3,7 155:24	68:15 69:25 70:14
kidnap 43:11 45:15	167:7,8 169:15,24	leave 93:2 115:18	166:20 168:7	71:8 75:8 77:3
46:4 47:9 91:23	170:5	129:13,24 138:8	linked 82:20 84:16	81:22 88:6,9,23
92:23	knowing 44:14	138:17 140:2	120:1	89:2,12 91:1
kidnapped 92:6	89:8	141:9,12 152:25	list 39:16 153:20,25	93:11 95:25 96:19
kidnaps 84:18	knowledge 5:1 9:8	153:8,9 164:3	154:2 164:7,18	102:19 105:6
kind 12:3 66:14	22:8,23 28:12	165:2	165:1,13	108:8 121:9 122:8
143:9 152:21	33:6,10 34:12,19	leaving 46:2 92:22	listed 39:20,22	122:14 135:19
kindly 58:22	36:19 57:6 64:1	150:9,19 156:19	163:23	136:16,23,25
knew 11:6 18:17	64:12 78:12 79:21	156:23	listen 53:23,24	138:23 140:21,24
19:19,19 21:8	80:17 96:18 100:2	led 47:12	literally 170:7	144:2,5,11 146:4
40:8 41:16 63:17	109:8,19,22	Lee 55:7 84:13	little 16:12 44:1	146:5 151:18
79:6	110:24 111:8,22	89:22 118:23	124:1 137:21	154:10 155:21
know 1:6 11:5	112:19 113:6	left 28:10,11 88:13	live 76:17 84:11,14	157:23 158:10,13
12:19,19 13:7	118:16,20 119:6	117:8 134:18	117:24	163:11
14:16 16:15 18:19	119:11,19,24	139:6 153:7,18	Lloyds 123:8	looked 23:2,8 24:25
19:2 20:20,22	121:25 137:5,12	156:17 164:4	124:23 125:23	25:16 29:7 41:24
21:1,6,16 22:21	142:4,22 143:14	169:4	load 84:20	55:20 60:18 75:9
22:22 24:23 28:8	148:3,15,18	legitimate 123:17	local 126:4	128:16
30:12 32:7,12,17	153:11 166:15	length 137:1	locate 111:13	looking 10:3 11:18
35:12 37:20 44:6	known 6:5,12 8:20	lest 112:23	locked 9:21 12:10	23:22 24:9 35:24
56:1 59:6,10	18:12 22:16 48:17	Let's 53:3 86:23	12:10 139:10,11	38:22 42:20 44:21
62:17 71:22 73:17	48:25 56:15 79:23	160:15	log 8:13 14:9 93:21	44:22 60:1 68:12
75:6 76:4,7 77:5	99:12 168:17,20	letter 134:9	97:3 104:8,10,15	105:3 111:24
79:1,16 81:3 86:1	knows 8:13	letters 13:7,8,9	104:16 105:8	112:6 119:8
90:9,13 103:22,23		letting 1:6 150:24	106:9 149:9	142:18 154:6
103:24 105:14	L	level 7:21 49:17	153:14,15 158:23	155:1,6 159:22
106:6 107:13	lack 84:6,8	112:10,20	159:1,17 165:14	163:3
109:16 110:4	lacked 86:14	liable 130:25	165:15,20,23	looks 113:18
115:6,8 117:1	lad 84:22	liaise 144:21	166:4	129:22 167:9
118:20 121:4,7	laid 130:10	liaison 136:9	logs 8:5,6,11,12,20	169:3
122:17 124:22	Lancashire 118:24	life 29:16	8:24 13:2,10	Lord 123:15
127:14 129:14	Lane 162:1	lights 94:6	27:20	lot 1:12 13:3 14:6
136:16 140:10,11	language 122:6	Likewise 29:19	long 5:20 92:24	29:16 30:21 31:8
141:6 142:20,23	large 17:25 22:14	limited 17:6 19:15	101:15 148:18	85:13 87:4 101:9
143:2,4 145:7,9	123:3	148:18	160:17,18 161:3,7	101:25 102:1,3
147:4 148:8,9,14	largely 100:25	line 7:16 11:2 18:1	161:8 163:17	104:23 169:18
149:1,10 150:11	lastly 4:20 7:11	21:16 22:13,24	166:11	170:1

lots 51:20 80:10 85:17 Lower 44:8 89:6 lunch 106:16 121:19 Luncheon 98:23 lunchtime 123:14	126:22,25 149:15 149:18,20,22,23 151:20 Marina 1:5 mark 93:3 158:8 marrying 69:21 Martin 67:9 144:20 masks 116:7 119:5 match 44:17 material 105:9 111:1 145:16 matter 1:6 10:6 18:6 29:21 44:10 112:18 120:19 128:14 131:24 132:1 matters 56:16 132:17,22 McLennan 21:2 22:9 91:10,11 McLennans 20:14 21:18 91:20 125:1 mean 24:2 25:17 52:6 89:18 100:7 126:7 127:18 132:18 140:15 143:17 148:4,4,9 149:13,19 159:15 161:18 165:20 167:23 169:1,1 meaning 87:7,9 148:4 149:7 means 13:10 61:25 115:3 160:9 163:4 163:10 meant 30:14 143:16,18 mechanics 116:22 meet 123:5 meeting 33:1,5 43:18 91:8 Melanie 67:12 member 10:2,7 88:5 168:16 members 11:12,18	91:9,10 92:6 112:16 113:2,8 members' 92:5 memory 27:24 28:4 76:11 104:4 148:21 151:11 men 71:5 74:16 116:19 mention 34:20,23 35:2,4,5,8,11 36:11 45:9 48:3,8 50:3,8,11,14 57:6 57:7 62:19 63:5 63:15 82:22 86:9 mentioned 8:23 33:10,12 34:1,8 34:10,12,15,16,25 35:21 36:14,15,17 38:21 39:19 42:7 42:12 43:3 45:20 46:15 47:7,25 48:8 49:10 50:17 51:25 52:7 53:7 56:24 57:22,23 62:21 71:17,19 83:4,13 85:11,13 87:3,4,20,21 91:3 92:1 120:2,3 147:20 148:14 160:10 168:16 mentioning 55:17 56:17 57:4 mentions 62:2 menu 41:1,22,24 Messrs 112:7 119:19 method 168:22 MG3 127:9 128:3,6 129:2 MG5 64:5 111:4,13 111:14 MG5s 30:23 76:12 MG6C 122:7 mid 123:22 middle 39:14 43:23	Mills 16:1,1 mind 13:20 mine 65:7 154:13 minute 72:17 98:15 minutes 127:6 130:1 134:25 166:11 misread 154:14 mistaken 25:17 160:9 mitigation 152:8,17 157:4,8 MO 41:21 46:18 53:16 54:24 58:8 92:5 mobile 155:25 156:2 Model 77:6 modus 46:18 moment 7:9 26:20 29:5 37:2 42:17 44:11,21,23 45:13 46:10 49:4 58:14 95:6 129:12 155:17,18 Monday 140:20 141:8 143:19 144:17,24,25 145:2,3,6 146:6 166:24 money 116:2 118:8 monitoring 97:4 month 19:23 20:2,3 23:10 months 6:3 11:19 32:2 36:10 149:16 Moore 126:17 127:2,5 128:1 morning 1:4 9:20 10:4 11:13 86:3 102:17 108:16 123:11 150:5 152:3,11,14 156:13 157:3 160:16 165:3	166:19,24 168:19 170:19 mornings 16:19 mother 99:4 motor 89:14 91:8 92:25 94:1 move 6:5 20:25 21:16 26:15 36:24 65:14 128:25 moved 5:22 6:1 21:6 84:18 128:17 128:22 movement 22:15 152:5 moving 84:20 Mulverhill 122:17 murder 162:18,19
M				N
MAC 55:11 MAC-10 51:2,5 55:13,16 84:17 machine 82:20 machines 166:12 main 12:12 13:1 38:22 62:16,18 92:17 120:21 majority 101:7 making 7:5 28:22 30:24 31:1 37:25 39:5,8,10 40:2 41:25 142:8 163:25 167:9 male 45:16 46:1 91:24 92:22 95:19 95:22 96:15 males 44:14 63:9 89:8,16 91:5 94:10,12 123:23 man 15:23 94:18 managed 6:17 7:13 7:19 77:24 management 7:4 8:16,21 25:16 manager 7:16 158:15 163:15 managers 11:2 Managing 7:3 manning 7:11 March 2:9,13 6:9 11:16 20:3 23:2 24:5 32:11,13 81:7 93:6,13,15 94:1 96:9 100:24 105:24 106:2,7,11				N 171:3 name 1:23 2:10 3:4 3:10 4:6 62:21,22 101:18 135:11,14 135:20 159:16 165:15,17,19,24 167:12 named 8:17 17:12 26:10 67:23 68:3 74:9,16 146:23 names 24:3 63:2 85:14,17 87:4,19 87:21 88:2,2,6,10 88:12 112:6,10 157:12 165:11 naming 82:12 narrow 164:8 National 77:5 nature 8:22 9:6 122:11 NatWest 161:24 near 65:19,21 96:24 97:4 nearby 116:1,4,10 necessarily 79:18 118:12 122:25

143:17	140:6 151:14	41:12 44:1,21	occupants 89:23	142:14 156:12,16
necessary 40:18	162:15 165:3	64:25 65:8,13,21	occurred 27:12,25	158:7 169:21
116:11 145:21	notebook 125:14	114:19 144:5	34:2 53:8 78:6	officers 9:12 49:6
need 2:2 40:13,22	noted 92:20 95:8		92:5 107:14	49:20 64:4 79:3
41:6,11,17 65:14	125:18 146:21	O	115:25 169:6,12	84:24 85:18 88:8
65:20 66:2 75:10	notes 27:2 28:22	objection 134:17	OCG 53:15 54:23	91:13 106:23
86:7 87:7 125:16	29:7 31:1,15,16	objectively 131:23	60:13 78:22 81:20	107:17 108:5
127:4 133:22	43:16 44:18 48:4	observation 7:11	82:13 88:10 91:9	109:4,6,9 111:3
151:9 170:3	48:7 49:16 55:15	93:21 94:24 97:4	91:10	111:11 119:13
needed 12:10 16:7	79:24 93:19	102:15,16 104:6	October 23:23	147:21 158:2
129:25 142:15	138:24 140:12	104:15,16,17	66:24 67:15 68:17	160:24 164:12
169:14	141:2 142:18,21	106:7	100:22 135:15	169:9
needn't 113:17	143:15,20,21	observational	136:24 137:2,5,17	Offices 61:1,20
neighbours 44:14	146:4 147:7	144:19	137:19,21,25	okay 1:21 2:25 3:2
89:8	150:14 151:12,13	observations 2:18	138:12	4:3 7:8,10 9:9,12
never 28:6,15	162:20 167:22,23	6:16 7:23 15:21	offence 34:1 43:1	10:24 11:3 12:17
33:19 90:3 99:21	notice 12:11 26:22	20:7,10 93:17,19	45:6 47:25 50:4,9	12:21 15:3 23:2
111:17	103:17 130:4	95:22 97:23 99:19	50:12,22 51:8	26:12 35:7,14
new 18:1 68:15	notification 134:12	100:10,10 104:8	53:16 54:24 57:22	36:18 42:20 44:1
69:23 72:2 138:12	notified 131:1	108:3 124:22	58:2,4,8 59:17,18	44:24 47:19 53:4
139:8,12 141:22	notifying 130:10	168:20	60:14 72:4,5 76:2	55:15 59:8 62:3
142:19 143:9	notwithstanding	observed 46:1	81:20 90:3,14,24	66:3 81:9,11
145:20 146:7,10	133:5	92:21 94:1	offences 17:24	90:16 95:10 97:1
146:13,15,16,18	November 67:20	observing 46:2	18:10 47:9 50:16	98:20 99:24 100:3
147:2,2,9,14	70:12 73:2 138:24	92:22	53:13 54:21 57:14	100:19 104:17
148:8,25 149:2	139:2,14,15,25	Obtain 121:25	58:1 60:11 64:7	106:14 107:6
Nexus 32:25	140:3,20	obtained 164:6	71:24,25 99:10	122:5,12 130:2
Nicky 127:2,5,25	nub 85:7	obvious 131:17	100:8	136:8 138:1,17
Nicola 126:17	number 16:17	obviously 6:16 8:18	offender 41:1,22,24	139:13 141:10,12
night 40:9 41:16	17:16 19:15 24:12	8:20 14:22 20:23	offenders 46:17	143:15 145:22
126:21 150:6,21	25:1 42:5,24 43:1	36:1 40:16,25	90:1 116:3	149:19 151:1
150:25 152:1	43:3,5,13 44:4,17	47:22 50:19 57:9	office 10:5 47:10	155:20 156:10
154:4 155:7 158:4	44:18,25 45:1,9	138:11 140:10	51:21 73:1 76:14	158:5,17,21,25
164:12,14,15	45:14,19,20 47:8	141:18 145:13	109:17 115:12,20	159:13 161:19
167:7 168:10,18	65:3,12,16 74:21	147:3 159:17	116:1,8 138:9	164:5
nights 168:14	74:23 86:9 87:19	162:9 164:19,22	139:11 140:4	old 128:23
nine 4:23 47:14	87:21 88:2,10	167:6,12,16,25	141:22 142:19,19	OM 77:3
nominal 149:10	99:23 103:2	occasion 14:11	145:20 150:9	once 129:14,15
nondescript 95:2,3	105:16 107:11	15:21 17:11	152:24 153:2,9	ongoing 49:9 52:6
normal 12:2	119:25 123:12	112:20 113:11	officer 2:22 6:11,15	141:23,25 143:9
normally 150:2	138:4 147:20	129:1 167:20,21	6:24 27:15 51:5	160:18 163:18
northern 163:16	154:15 155:25	occasionally 14:11	63:22 80:25 105:1	onwards 81:5
note 27:5 43:24	156:3 166:21	occasions 56:24	110:11 120:20	Op 127:21 128:21
44:10 55:9 88:25	numbered 72:22	57:12 86:10 93:4	122:16 128:12	144:16
89:2 103:4,7,19	numbers 24:2 36:2	113:3	129:8 141:20	open 11:24 135:13

<p>opened 134:1 opening 2:8 34:11 operandus 46:19 operation 6:12,12 6:14 7:23,24 8:4 9:16,19,25 11:15 11:20,22 12:2 15:19 23:3 24:4 27:13,16 32:5,8 33:4 34:11,16,16 34:17,21,21 35:12 41:1 43:5,11,13 44:25 45:2,15,20 45:22,25 46:12,15 46:16,17,18 47:1 47:3,7,14,14 51:18,24 52:9 55:4 57:18 58:5 60:25 61:13,18 62:8,16 63:7,8,18 64:10,13,15,18 76:13 78:7 80:21 82:3 83:4,13 84:11,15,19 85:22 86:8,15 87:8 90:18 91:3,22,22 92:13,14,14,16,19 93:5 100:21,25 101:5 106:1 110:12,24 111:8 111:16,17,25 112:4,7 113:13,19 115:11 117:25 118:15,16,17,21 119:11 122:13,20 128:14,17,19 129:2,3,9 133:14 137:22 138:20 141:13,23 143:8 154:23 155:23 156:1 160:18,18 160:25 163:18 164:23 166:24 167:15 operational 10:1</p>	<p>operations 35:11 39:2 42:6,13 50:16 101:1,2 opportunity 27:24 78:6 opposite 94:5 opposition 130:25 ops 144:19 option 134:18 options 17:6 OPUS 30:11 orally 134:2 order 15:9 40:14 40:19,22 41:4 92:7 129:6 ordinary 112:23 113:2 organised 6:2 44:5 45:4 46:3 65:6 90:22 112:8 119:8 original 26:19 49:13 93:4 111:10 originally 3:6 14:3 17:19 29:25 126:3 others' 120:23 ought 77:10 134:15 outcome 64:13,14 64:18 117:13 118:3 outlined 33:5 87:24 112:12 119:25 outside 51:5 88:6 129:25 overall 19:22 118:13 overalls 119:4 overlap 113:11 overnight 169:24 overwhelming 131:4 Owen 68:6 ownership 11:9 12:24</p> <hr/> <p style="text-align: center;">P</p> <hr/>	<p>P/365 119:1 page 17:13 24:5,9 34:20 39:12 43:5 43:20,23 47:5 48:20,20 50:21 53:5 54:1 55:21 56:22 57:5,8 59:16 60:5 65:3 65:10,16,22 68:9 70:1,14 80:3,5,9,9 80:13 81:23,24 88:25,25 91:1 92:2 96:7,8,12,21 97:3 103:1 105:16 105:17,17,20,20 105:23 107:24 113:16 121:16 122:19 123:1,10 123:10 124:9 125:8 126:19,20 132:23 139:1,2,9 139:11,22,24 140:22,24 144:4 144:12 146:6 151:25 154:6,15 160:11 163:11 166:3,8,18 167:11 168:5 pages 14:3,7 15:1 54:8 65:21 71:22 72:10 77:3 93:8 104:3,3 105:17 137:1 148:18 158:13 paper 126:4 paperwork 105:4 paragraph 33:18 34:12 50:20 54:19 55:5 59:15,16 60:18,19 61:7,7,9 61:9,12,21 62:5 94:23 160:3 161:14 paragraphs 34:5 53:11 54:2 60:7</p>	<p>81:25 93:25 parked 94:11 Parker 20:12 Parkinson 18:20,21 18:23,25 19:3 20:12,13 23:13 24:14 25:1,8 92:8 92:14 100:16 part 24:3 37:14,18 53:15 54:22 60:13 63:24 64:15 96:9 97:2,23 100:14 115:9 118:12 130:5 144:7 152:15 154:7 155:5 168:6,24 169:4 partial 37:5 partially 42:8 particular 2:3 5:21 10:2 25:10,19 33:11 34:13 41:24 41:25 75:3 76:6 99:8 114:4 118:7 118:8 137:11 146:5 particularity 84:8 particularly 10:20 95:8 103:15 143:4 partner 101:18 parts 127:22 130:17 170:2 pass 64:9 78:2 79:8 79:15 109:9 133:8 169:23 passage 107:19 passed 15:14 49:6 81:12 111:22 153:25 155:11,15 157:14,16 162:10 167:5 passenger 94:16,18 passing 8:21 64:8 78:10 79:6 126:6 164:17 165:11</p>	<p>password 12:10 password-protoc... 148:17 pasted 13:6 pathway 120:5 patterns 113:7 Paul 67:15,20 128:18 Pause 139:22 151:19 pausing 31:5 114:22 pay 29:1 pending 128:10 penultimate 60:18 people 8:17,19 10:5 11:10,11 15:18,20 17:10,12 19:2,16 19:19 21:7,12 24:3 26:10 29:15 29:17,20 49:11 57:23 64:5 66:25 67:1,12 69:9 74:13 83:10,11 85:11,19 86:11 112:15,19,23 118:6,7 159:4 164:10 performed 74:14 performing 137:23 period 10:20 25:7 69:11 100:1 112:2 113:18 116:17 142:11 156:8 permission 129:10 person 1:14 47:10 personal 30:23 79:20 personally 79:23 153:6 persons 112:1 perspective 132:8 164:21 Pete 101:18 Peter 60:24 61:17</p>
---	---	--	---	---

62:2,23 63:11 67:2,5,14,19 68:20 69:2,3,15 70:2 82:2 84:23 115:17 phone 20:13 21:20 21:20 24:2 151:9 154:1 162:6 170:6 phones 20:14 24:7 99:22 105:1,6,9 photograph 108:22 photographs 21:18 physical 24:15 114:25 115:1 116:16 117:11 131:14,21 physically 15:22 pick 101:14 picking 46:1 92:21 92:25 picture 109:10 118:5,13 120:4 131:18,21 piece 19:9 39:15,19 39:22 89:3 100:5 pillars 133:10 place 3:7 11:4 12:12 13:11,20 33:2 68:8 116:10 124:23 126:15 145:8,9 161:23 placed 25:22 plainclothes 5:15 plan 147:9 152:15 167:8 Planned 145:7 planning 18:10 21:12 45:5 46:4 90:22 92:23 99:10 100:8 plans 147:4 plates 125:7 play 63:24 played 116:23 please 1:9 3:3,12,17	3:20 4:4 5:4 13:16 23:16 31:25 31:25 37:21 41:9 42:7 43:15 47:23 49:24 50:1 58:23 59:9,13 60:6 64:18,20,24 66:17 70:8 72:7,20 73:20 75:8 80:1 81:22 88:23 93:6 93:11 95:25 96:1 96:19,22 99:20 102:19 103:1 120:19,22 122:13 122:19 123:10 125:12 126:14 127:20 129:25 130:14 135:5,13 135:19 138:23 139:20,22 140:22 144:2 146:4 151:18 154:6 158:11 pm 58:20 66:4,6 98:22,24 135:1,3 144:17,17 151:24 170:22 point 21:4 48:19 58:16 62:17,24 63:1 64:4 80:24 80:25 82:9,12 85:10 86:12 88:17 88:19 98:12 100:18 101:14 106:14 111:4,14 111:15 114:8 117:15,17,24 119:12 142:8 153:9 165:19 167:14,16 points 139:19 police 5:5 22:2 49:6 49:19 84:24 88:7 89:21 91:13 118:4 120:4 123:12	131:4 136:10 137:16 147:20 149:9 152:16 164:18,24 167:15 168:10,12 169:8 Police's 154:7 policing 112:18 162:25 poor 3:22,23 pop 87:23 popped 85:14 88:3 popping 88:7,10 populating 13:1 position 169:20 positive 98:6 possession 114:18 114:22 133:1 158:25 possible 161:22 163:21 possibly 124:2 164:16 post 47:10 51:21 61:1,19 73:1 76:14 97:4 102:15 102:16 104:6,17 106:7 115:12,20 116:1,8 144:19 posts 7:11 15:23 potential 103:20 126:7 165:1 potentially 119:3 130:24 148:19 power 28:23 86:11 86:14 PowerPoint 86:2 practicable 17:9 pre-con 48:21,21 pre-rated 15:5 precise 131:5 preferred 68:9 69:23 74:10 75:1 75:22 premises 17:24 45:5 46:2 51:4,6	58:12 90:23 92:22 124:24 153:21,25 156:21 157:12,14 157:16 164:7,18 165:1,10,12 166:12 168:18,23 169:24 prepared 26:24 78:13 109:15 present 28:7,8,24 111:18 142:3,7 Prestwich 114:2,11 presumably 18:20 21:8,10 64:8 106:9 109:12 presume 10:19 14:24 38:12 previous 38:15 72:8 76:22 127:22 140:23 160:11 previously 28:1 36:10 51:20 68:19 68:24 69:9,18 124:18 125:23 168:16 pride 162:14 principally 63:18 principle 119:8,9 printed 38:10 65:8 65:21 120:25 prior 60:24 61:18 61:20 82:2 114:8 137:24 144:22 prison 20:15 21:8 21:13,19 29:15 private 115:19 116:19 proactive 5:22 64:15 111:25 112:4 113:18 115:11 117:25 161:11 probably 66:10 125:16 138:3 142:1,10 143:2,7	144:9 145:18 147:1 probing 148:7 problem 2:5 37:3 44:24 88:22 101:22 problems 133:12 probs 130:2 procedure 120:19 130:9 proceedings 66:8 118:4 process 21:23 produce 4:10 37:10 37:12 41:10 produced 38:1 produces 137:10 profile 18:24 22:9 80:23 profiles 19:18 80:20 promptly 128:7 proper 130:13 131:25 133:7 property 44:8 89:6 propriety 131:9 prosecuted 44:14 45:7,16 89:8 90:6 90:10,14,25 91:15 91:24 92:10 128:18 prosecuting 127:24 prosecution 117:2 prosecutor 122:7 128:1 protected 12:21 proved 112:20 provide 54:11 78:9 120:25 138:7 150:1 provided 20:23 39:16 54:5 74:1 122:20 139:13 149:17 153:24,24 167:20
---	---	--	--	---

providing 37:4 79:10	question 7:21 15:17 19:1,4,20,23 22:4 22:25 25:14 26:2 28:21 41:9 46:23 46:24,24 49:21 53:24 81:8,15 86:19,24 87:1,15 106:4 107:1,3 108:2,12 110:4 117:15,18,21 128:20 129:7,10 129:12 130:12,13 130:19,23 131:5 132:7 133:17 148:7,22	129:12 132:16 raised 19:9,17 22:8 22:23 121:21 129:7 132:17 raising 19:18 ran 11:20 63:18 89:16 rang 158:19,20,24 159:14 range 9:8 109:21 148:2,23 149:13 rated 8:7,8 77:24 rating 8:1,22 13:12 15:7 17:16 77:15 77:25 ratings 12:22 17:16 rationale 168:11 react 86:22 read 5:7 25:18 40:4 40:19 41:19,21 60:19 64:5 107:19 111:14 113:17 120:12 125:16 145:16 168:6,24 reading 18:15 21:1 108:10 150:14 151:11 153:12 157:13 ready 8:8 42:19 realise 150:5 165:22 really 11:16 12:8 17:7 18:1 19:22 46:20 88:25 137:10 141:23 164:8 167:14 rear 94:18 97:6 reason 12:7,12 14:20 85:17 100:4 103:15 139:9 147:15 160:21,22 161:15 162:5,9 163:10 reasonably 86:22 87:6	recall 13:3 25:22 26:4 30:16 31:5 63:17 90:13,14 97:22,24 102:14 104:19 106:12,16 121:6 151:5 164:17 166:15 167:3,6 rece 45:5 90:23 receive 13:2,10 45:6 145:11 received 8:2 15:10 16:5 19:10 21:22 25:12,25 90:24 119:13 125:19 130:4 146:8,11 158:24 recognised 94:14 recollect 153:18 recollection 27:22 28:18 30:5 36:9 36:19 149:23 150:14 156:17 reconnaissance 113:25 123:7 126:10 reconnoitre 91:7 126:11 reconnoitring 168:23 recontacted 160:3 160:9 record 50:2 55:10 56:22 105:8,8 147:13 154:8 163:7,25 recorded 7:6 9:3 10:17,21 27:19 52:10 55:19 56:17 56:23 93:21 96:12 103:10,11,13 104:8,20,25 105:2 106:1,5 152:11 recording 31:9 records 28:25	35:18 36:1 102:13 140:23 157:18 162:12 recover 156:2 recovered 24:7,16 76:25 83:6 84:12 84:14 104:19 116:12 117:25 118:9 119:5 125:4 144:8 recovery 76:16 116:16 131:21 recycled 86:2 red 23:17,19 94:3 94:12 102:20 119:1 redacted 14:6,7,21 17:18 23:24 24:2 redaction 155:22 redactions 14:18 reduced 69:10 refer 1:12 24:13 reference 17:16 23:3,9 25:19 32:23 36:2 40:13 48:6 49:5,12 64:25 72:19 102:22 107:23 112:14 118:25 126:19 127:17 128:25 148:23 referred 31:21,22 36:1 76:9 108:14 108:23 referring 55:15 56:13 62:20 80:2 107:2 108:11,17 151:14 refers 4:6 24:23 48:18 49:1,3 108:16 132:23 reflected 115:10 refresh 27:24 regard 147:10 regarded 86:14
<hr/> Q <hr/> Q9 110:10 119:13 quadruplicating 10:13 quality 117:11 quantities 112:25 quantity 114:18	question/answer 167:24,24,25 168:1 questioning 126:15 130:5,5 questions 1:22,24 81:9 96:1 98:10 98:11 99:2,17 101:13 110:9,10 120:17 129:16 130:10,16 134:12 134:15 135:10,12 147:2 156:3 170:8 170:10 171:6,7,8 171:9,10,12 quick 136:16 quickly 127:11 quite 3:22,23 13:3 23:24 29:1,10 35:24,25 56:2 87:4 104:23 123:21 127:11 138:13 141:22 148:1 154:14 167:17 169:8 170:1 quote 101:1 <hr/> R <hr/> raise 18:24 22:9			

regarding 152:7,16 157:4	37:13 66:10 98:4 99:14 121:8 131:5 145:25 146:2	101:17	15:5 17:7 18:15 20:11 22:6,19,20 23:6,7,11 26:21	160:25 162:21 164:9 169:14 170:3
regular 145:13	148:20 150:19	request 32:5 60:1 122:4	27:15 28:11 33:18 34:7,20 35:18 38:19 41:2,23	Rob's 155:14
rehearsed 116:23	151:12 152:25	requested 31:20 33:1 121:4	49:8 59:1,3,5 65:8 65:20,22 66:1	robbed 125:23
relate 14:19 127:22	153:1,19,20 157:7 157:10 159:10,20	required 18:2 133:25 144:18	71:11 73:9 74:14 74:19,25 76:15	robberies 9:18 29:13 51:21,21
related 132:24,25 133:1,10	162:9 164:13 165:10 168:3 169:1,21	requirement 77:9	77:4 82:24 85:24 94:7,14 95:12	52:5 53:17 54:25 58:4 61:1,15,19 62:10,15 92:4
relating 122:24 128:14 129:18	remind 74:20	requirements 77:8	96:23 98:20 99:18 100:23 101:20	119:22 120:9 127:25 168:23
relation 2:21 22:10 23:3,5 27:25 33:3 33:11 36:23 39:2 40:25 47:9 50:13 50:16 62:16 70:25 72:25 76:24 77:17 77:21,25 78:19 82:22 83:4 85:10 85:12 87:3 91:7 110:24 111:20 117:9 118:22 121:21,23 122:1 128:3,4,5 132:17 134:13 152:22	remit 80:17	requires 151:23	103:1 104:13 108:13 109:1,18 119:10 121:5 123:21 125:5,15 129:19,20 132:18 133:16,20 134:21 136:11,23 138:5 138:21 139:15 140:8,16,18 141:7 141:15 142:12 144:4,9 147:8 149:18 150:18,23 152:1 154:14 157:12,15 159:5 161:15,18 163:8 170:19	robbery 5:18,18,21 5:23 6:6,8 9:17 10:8 15:18 17:23 18:11 21:12 29:11 29:12 30:22 34:1 34:7,18 43:9 45:2 48:1 50:25 51:13 51:14,15 52:3,4 52:14,20,22 53:7 55:7 57:16,21 58:1,1 59:22,23 62:13 64:16 67:6 67:9,18 68:16,23 69:14 71:5 72:5 72:25 74:14 75:20 76:1,2 81:13 82:8 85:16 90:2,20 91:7,11 99:11 100:8 109:23 112:4,9 113:1,22 114:1,4,8,19 115:3,4,10,16,25 116:8,10,12 118:17,24 122:18 124:23 126:5 137:25 147:11 168:13,19
release 20:15 21:17	removed 72:10,13	research 9:13 10:17,24 23:4 24:5 25:3 26:6	161:15,18 163:8 170:19	robbing 67:15 69:16
releasing 129:21	removing 123:3	researcher 109:17	right-hand 65:1	Robert 2:22 7:15 21:20 22:17 119:20
relevance 1:11 108:7 134:1	repeat 3:12 60:17 127:19	researching 23:9 25:19	Rimmer 22:16,17 24:22 119:20,23 127:3	Rocque 135:5,6
relevant 10:19,20 11:20 46:17 48:22 50:4 58:2,7 119:3 120:7 141:3	replicate 38:14	resident 114:11	Rimmer's 21:20	
reliability 8:1 100:6,17	replies 127:5	resources 142:15	ring 125:25 159:14	
reliable 21:13 28:19 100:5,6,13 133:6	report 4:7,10,11,13 4:15,24 31:21,22 32:4,19,24 35:15 35:16,19 36:15,21 37:4,7,9,10,12,16 38:14 42:10,22 44:18 46:7,10,13 46:25 47:5,20,21 47:25 48:6 49:16 50:1,5,13,18,20 51:25 52:1,17,23 53:21 60:17 72:22 74:13 75:14 121:2 121:4,21,23	respect 50:12 104:18 125:1 126:24	ringing 159:10,11	
relied 133:10	reported 126:12	responsibility 7:1 10:3 12:24 14:14 14:15 79:15	rise 66:2	
remain 70:16 129:25	reports 38:11 39:2 39:16,17,20,23 40:4,13,19,22 41:7,10,11,17,19 54:12 69:21 76:9 76:10 77:1	responsible 11:8 109:24	road 94:2,5 125:22 161:24,25	
remainder 166:13	reposed 11:4	rest 155:21 161:4	rob 66:24 69:7 70:18 71:1 138:8 138:15 143:7 150:8 155:16,25 156:6,18,18 158:2	
remained 156:6	represent 99:3 101:18	result 70:2,22 71:1 96:13 158:1		
remand 62:12	representing	resulted 91:9 122:6		
remember 11:11,25 12:1 14:23 24:24 26:7 30:11,20		results 21:24 69:22		
		resumed 140:25		
		retired 137:18		
		returned 134:4		
		returning 140:3 166:24		
		reviewed 117:3		
		Ribble 123:8 124:24		
		rider 87:25		
		right 1:13,14 2:7,10 2:13 4:3 5:8 6:22 7:8,17 11:18 14:9		

140:4 171:11 role 6:14 7:21 8:1,9 16:21 37:17 76:4 111:16 137:22 138:12,15 140:25 143:10 145:19,20 154:5 155:19 roles 138:11 170:6 rolls 63:10 room 16:17 28:18 29:6,20 30:1,17 78:5 129:24 134:4 roughly 5:12 101:4 round 44:2 45:1 82:14 126:9 159:10,19 Royal 114:2 rubric 119:14 rule 130:11 134:10 ruled 111:20 ruling 117:20 131:9 131:12,22 133:4,5 133:14 running 9:15,18 11:22 58:12	28:20 29:11,18 31:3,17 35:1,3 36:21 38:16 49:2 52:1 55:10 56:19 57:4 62:7 73:11 83:7,19 84:1,5 85:7,8 86:13,17 90:5 97:17,24 106:16 127:2,13 128:9 136:21 142:9,9 143:10 144:15 145:1,18 147:8 148:22 149:1 150:11 156:11 157:3,20 157:22,23 158:18 159:18 160:1 163:5 164:1 168:3 says 4:9 18:9 24:20 29:19 33:18 34:12 44:7,10 53:21 54:4 56:2,12 59:16 60:9 61:21 89:5 92:19 99:9 100:7 108:21 127:8,21 132:18 139:18 140:1,25 152:4 154:16,21 157:6,14 160:3,11 161:15 163:3,13 166:20 167:4 scale 22:15 Scotland 114:2 search 116:2 149:9 searched 116:6 125:9 searching 149:5 seat 94:15,18 97:6 123:4 124:12 sec 42:14 second 33:25 34:7 39:12,19 47:25 48:20 50:20 53:5 53:7 60:5,6 67:4 71:16,18 88:25	90:17 97:13 99:8 108:9 115:10 134:13 154:11,17 160:5 161:16 166:2 167:20 169:4 section 55:20,22 see 3:13 4:7,12 9:20 14:4,6,25 16:25 17:14 23:3,8 25:18 40:25 42:1 43:20 46:5 48:3 53:5 59:1 60:2,15 61:4 65:8 66:19 68:5,12,19 70:1 70:21,25 72:25 73:6,22 74:1,4 75:16 79:24 80:6 80:23 81:4 82:14 85:17 95:12,24 96:8 97:15 121:10 122:25 123:14 127:3 128:24 135:19 136:4 138:23 139:8,13 139:25 140:1,5,9 140:10,15,24 142:17 143:21 144:4,12 145:4 146:7 151:20 153:21 154:19 155:14,21,23 162:21 163:13 166:3,10,14,18,25 167:1,17,19 170:1 seeing 16:25 seek 132:10 seeking 133:14 seen 13:5 24:25 55:9 80:20 84:20 88:19 91:6 95:16 95:19 99:21,25 113:20,25 114:9 115:18 116:3 123:1,2,23 124:1	124:11 150:8 157:2,17 160:1 165:3 168:20 send 127:2 sending 41:2,22 senior 142:14 143:6 sense 99:21,24 sensible 145:18 147:17 sensitive 9:6 sent 16:21 17:1 37:11 153:15 158:23 165:14 sentence 99:8 155:22 161:21 sentences 45:7 90:24 161:14 separate 23:18 41:9 separately 109:15 September 3:18,21 3:24 6:7 110:17 121:13 122:7,9 132:24 sequence 32:6 sequential 114:19 114:22 sergeant 7:14 143:1 161:10 series 39:1 92:4 110:21 112:12 serious 44:5 45:4 46:2 90:21 serve 5:13 served 102:22 service 5:5 137:16 147:11 162:15 serving 6:8 set 12:11 25:17 36:18 40:14 41:4 111:7,24 115:16 sets 36:21 setting 26:25 166:11 shape 51:18 shared 14:14	Shaw 1:16 73:12 93:10 120:24 122:14 139:20 sheet 70:2,22 71:1 sheets 69:22 shift 144:17,18 145:2 Shire 6:12,14 11:15 15:19 23:3 33:4 100:21,25 101:5 101:15,24 102:8 104:18,23 106:1 127:21 128:3,4,5 128:14,19,21 129:1,3 137:22 144:16 shooting 32:14 100:1,24 shops 168:15 short 12:11 35:24 35:25 37:8,10,12 58:19 62:7 66:5 92:24 99:6 107:19 115:25 116:17 135:2 shorter 137:9 shot 19:24 110:11 shotgun 43:8 44:13 51:3,4 52:11 55:6 55:11,12,13,14,15 82:18,21 84:17 89:7 90:1 114:5 shouting 13:9 show 139:20 showed 91:4 shown 108:22 109:9 shows 48:22 side 25:24 65:1 94:5,21 100:17 153:2 sight 111:3 sign 136:4 signed 121:16 135:23
S				
S 12:15,16 13:17,24 30:22,22 61:17 148:18 safe 166:5 Sainsbury's 162:1 Salford 5:8 20:23 33:6 89:15 112:9 113:6 115:11 Sandringham 94:2 sat 16:9 55:23 56:8 143:22 Saturday 140:19 143:19 save 72:18 saw 81:7 94:9 95:14 97:19 150:18 saying 19:7 24:13				

significance 93:3 164:17 significant 38:23 94:25 101:23 143:16 signs 36:2 silver 64:9 78:23 97:2 103:20 106:24 120:10 123:21 similar 53:12 54:20 57:14 58:1 60:10 166:16 similarly 22:13 132:7 simple 66:13 148:1 simply 113:3 132:11 single 69:11 SIO 7:14,15 19:5,6 140:4,25 141:13 141:19,19,24 142:2,2,6,7,7,9,10 142:11,24 143:3,5 143:12,14 145:15 145:19,22 148:19 148:19 154:22 155:8,10,23,25 156:6,11,14 160:25 161:12,12 163:20 167:19 170:3 sir 1:4,8 13:20 23:18 37:20 57:22 58:14 64:22 66:7 98:10,14 99:1 101:17 102:11,13 102:24 103:22,24 105:14 107:20 110:4,8 119:16 129:5,6 131:2,12 132:2,5,10 133:17 135:9,22 136:1 137:7 151:25 165:25 170:11,13	170:17,18,20 sit 1:19 135:7 sitting 16:17 19:15 146:22 153:1 six 32:2 33:7 36:10 54:2 six-count 66:19 skip 123:10 sledgehammer 114:5 sledgehammers 61:2 slow 31:7 small 15:20 16:16 16:16,17 19:13 65:8,21 87:14 125:12 139:19 smoke 119:4 SOCG 48:16,24 56:12,13 57:4 societies 17:24 Society 161:25 SOG 89:5 92:23 sole 138:16 somebody 2:4,6 13:17 51:2 111:7 153:14 158:22 somebody's 119:5 someone's 165:15 soon 127:3 158:24 sorry 11:25 14:17 18:18,22 19:11,21 20:21 21:4 22:3 22:12 24:10 25:13 25:21 26:3,14 32:1 35:1 37:13 38:4,5,7,18 39:7 45:24 46:18 48:19 48:20 51:19 61:8 64:2,25 65:3,3,16 65:24 67:1 71:10 72:19 73:4,5,19 73:21 74:23,25 75:13 80:4 81:8 100:16 101:6,17	101:20 106:25 108:13 109:11,13 123:7 126:19 127:17 129:3 144:10 154:14 156:9,16 165:18 166:7 sort 9:1 12:4 66:2 118:3 132:8 147:10 sorts 148:9 sought 113:14 130:16 sounds 6:22 9:16 13:9 147:17 158:8 161:6 speak 7:16 28:25 29:20 78:6 127:3 151:10 167:15 169:14 170:3 speaking 27:11 28:23 79:1 87:2 111:3 150:16 151:8 specific 16:21 36:4 50:15,15 115:10 specifically 11:23 52:25 110:23 113:15 specificity 84:6,7 spelt 165:24 spend 5:17 spending 101:15 spent 101:4,23 split 14:1 spoke 57:22 63:3 64:4 111:5 159:8 166:3 spoken 39:3 142:25 154:22 159:25 163:16,17 166:22 sports 94:24 97:9 spotted 10:25 squad 5:18,21 15:18 109:23	112:4 118:17 St 125:22 126:3 staff 15:22 19:18 46:2 47:9,10 92:5 92:22 93:2 114:6 116:1 122:2 141:24 143:22 144:18 146:22 147:7 148:7,23 150:3,5 151:8 156:22 162:8 164:16 stage 6:5 100:11 129:11,17,22,24 134:22 147:11 150:8 stand 152:4 standard 22:2 47:23 standing 88:5 stands 147:15 start 2:17 5:4 64:13 64:24 65:13 71:6 104:11 started 5:22 92:15 137:25 138:11 140:13 156:12 157:25 starting 138:24 starts 23:22 68:8 state 40:19,23 161:22 stated 160:24 163:17 166:22 168:8 statement 2:9,12,15 2:20 3:3,13,17,20 4:6,18,20 37:1,23 37:25 38:13,14,19 39:5,8,10,12 40:3 40:11,11,15 41:5 41:15,20,25 47:23 49:22 50:19 53:1 53:3,19 54:1,8,16 57:13 58:24 59:4	59:4 60:2,3,22 62:24,25 63:6 81:23 87:24 88:1 88:24 89:1,13 91:2 93:12,23 108:1,8,14 110:16 111:2,24 113:13 113:16 117:1 118:22 120:20,23 121:16,25 122:8 122:16,20 130:20 132:19,21,23 133:11 135:14,20 136:1,19 137:4,11 138:19 153:21 155:14 157:13,23 158:9 159:6,21 160:17 statements 2:17 4:23 36:25 38:20 110:21 121:20 122:10 130:18 136:7,22 stationed 137:22 stayed 68:6 69:19 73:7,23 74:9,16 74:22 75:20 steal 116:2 step 107:4 109:7 stepfather 99:4 Stephen 153:23 stepped 143:10 steps 30:4 Stevens 67:9 sticky 134:19 sting 85:7 Stoke 18:5 stolen 84:21 89:14 91:8 92:25 94:3 96:15 115:2 118:23 123:13,13 123:13,15,20,23 124:3,7,10 125:5 125:7 126:10 stop 164:23
--	--	---	---	--

stopped 97:4	86:11 112:6 152:5	10:9 23:17 41:2	42:10,20,21 43:15	16:16 17:11,22
stopping 31:9	subjects' 122:1	77:3 104:13 128:2	50:1 53:5 58:23	19:13 21:25 22:18
156:5	submissions 131:10	136:5,16 146:1	58:24 59:3,9,13	26:5 27:21 32:5,8
store 25:22 26:3	submitted 134:16	158:23	60:2,5 80:3,5	101:3 154:4 155:2
stored 11:6 128:15	134:17	surely 165:15	81:22 88:24,25	155:8 168:10,13
storing 128:20	subsequent 109:3	surprised 129:8	93:11 110:14,16	170:5
straight 134:23	114:15	130:11	110:18 120:21	teams 166:23
strategy 79:12,13	subsequently	surprising 117:13	135:13,19,20	telephone 6:15
Straw 98:14,25	116:22 117:4	131:23 132:13	138:23 144:2	24:12,20 25:8
99:1,2,3,3 101:11	118:24	133:4	146:4 154:6	telephones 7:1
129:6 132:4,5,9	substance 28:14,15	surrounding 10:10	158:10 163:11	23:12
171:7	29:10,23 44:22	17:4	tables 16:13,14	tell 9:22 10:5 12:19
Street 123:15	substantive 69:14	surveillance 99:21	TAC 55:23 56:10	18:1 22:12 36:1
strict 149:6	76:2	99:25 100:10,15	56:11	51:17 54:17 55:2
strike 76:12,19,24	suggest 52:23 86:7	112:1 114:23,24	tactics 79:9,13	62:7 90:10 92:10
77:1 117:25	100:12 118:12	116:14 117:5,12	take 14:22 17:13	92:12 93:1 96:17
struck 121:10	121:3 131:12	123:12 131:15,20	30:4 58:15,17	102:8,12 115:9
structure 141:19	141:2 145:5	132:25 133:1,11	64:19 66:11 69:25	129:11 133:24
structured 21:23	suggested 51:13	133:13	72:17 81:6 107:4	137:15 138:18
Stuart 26:18 50:22	52:3,21 59:22	surveyed 116:15	110:5 122:21	149:21 152:14
51:8 52:14 53:14	74:13 81:16 100:4	sus 9:21,22	125:20 139:19	153:17 160:20
54:22 59:17 60:12	suggesting 19:7	Susan 67:15,20	145:7 157:15,17	161:5 162:3 167:2
60:23 62:1,22,23	82:6	suspects 9:19	161:23	168:25
62:25 63:6,12,15	suggests 46:3 92:23	147:17,22	taken 26:5 93:8	telling 29:9,16 31:7
67:1,2,5,14,19	suite 146:18	suspicious 9:24	112:25 120:6	31:8 57:20,24
68:20,20,24 69:2	suits 97:9	suspicious 95:3,8	takes 29:15 116:10	83:23 101:23
69:15 70:10 71:7	summarise 113:14	126:7 159:1	Talbot 16:1,1	164:24 166:12
82:1,19,25 84:16	summarised	160:19 161:23	tale 36:2	temporary 33:2
115:18 116:3	117:12	163:19,21 164:20	talk 31:7	138:1
117:8	summarising 29:23	sustained 113:18	talking 27:8 41:3	ten 33:7 72:18
stuff 11:10,11	summary 113:17	sworn 1:18 135:6	45:22 63:14 79:15	115:4
34:17 38:21 63:3	sums 17:25	171:5,11	106:19,20,20	tender 147:11
77:23	Sunday 140:19	symbol 24:13	127:15 151:21,25	tends 145:5
sub 125:23	143:19	system 16:24,24	164:21 165:6,9	term 160:17,18
subject 18:6,24	superintendent	17:2 25:16 26:14	talks 157:24 159:17	163:18
29:21 55:25 80:20	26:18 28:23 29:3	29:8 30:6 128:23	Tansey 33:19 44:6	terms 8:3 11:9
80:23 85:6 86:15	30:24 31:1 33:3	systems 9:14,20	44:7 55:7 84:13	26:21 113:13
86:21,23 87:7	39:3 40:5,20,24	10:3 11:13,19	89:22 118:23	118:3,5,25 119:18
88:18,23 106:17	41:6 43:16 47:13	128:16,22	Tansey' 89:5	136:10 149:21
107:11 108:23	51:17,24 52:19,24		target 93:4	terrified 112:24
109:7,12 112:1	53:20 54:17 55:9		targets 80:21 159:4	text 169:5
114:1 126:4	62:8		task 19:2 31:13	TFU 106:15 107:10
127:21	support 142:14		tasked 19:18	thank 1:7,8,19 3:12
subjects 9:19 10:1	145:21		team 10:2,7 11:12	5:3 13:19,23
14:19 55:25 85:20	sure 1:16 7:5 9:25		11:18 15:20,21	23:21 26:16 29:2

T

tab 2:9,12,20 3:3,6
3:12,17,20 4:4,12
4:17,20 31:25
37:21 38:8 42:7,9

46:22 47:4 56:5,7 58:14,21 59:8,12 60:6 64:21 66:15 68:11 73:21 74:25 75:12 80:19 81:11 87:22 88:21 93:10 98:9 99:1 101:11 101:12,20 107:25 110:5,19,20 120:15,18 122:5 122:12,19 123:20 127:7,16 129:4,5 130:2 132:3 134:7 134:8,25 135:9,16 137:4,8,14 154:18 170:8,9,11,13,14 170:15,17,20,21 theoretically 109:25 They'd 11:2 thing 3:15 10:11 12:2 29:14 34:7 35:3 61:6 79:14 82:18 83:17 90:17 91:21 134:19 146:20 147:12,12 147:22 148:12 149:25 152:10 165:9 166:4 things 6:22 11:5 19:8 29:6 43:18 48:7 55:8 66:9 71:23 78:6 83:23 84:5 136:7 142:19 143:9 147:4 156:24 157:19 162:14 165:7 168:25 169:9 think 1:10 3:6,7,23 4:4 5:7 13:16 16:2,7,9 18:2 22:17 23:18,20 24:2 28:17 31:6 32:2,6 35:12 36:18 39:9 41:3	42:12 44:17 45:18 49:2,13 51:4 55:18 56:3 62:11 63:18 67:23 68:19 68:24 69:18,19 70:21 71:22 72:11 72:15 73:6,25 74:13 77:5 79:22 81:4,7 92:1 93:25 97:10,17 98:12 99:17 100:22 102:20,22 103:25 104:1,14 110:14 110:16 124:24 125:8 130:8 133:9 133:22,23 134:13 135:25 136:4 137:18 138:3,4 139:8,24 140:13 140:17 142:25 144:8,14,24 146:1 149:17 154:16 158:13 161:14,16 162:11 163:4 164:9,15 166:19 167:12 169:13,18 Thinks 97:14 third 19:2 34:15 39:22 61:21 67:8 69:7 91:1,21 92:1 94:18 161:21 167:21 Thomas 1:3,4 161:25 thought 30:17 55:24 88:5 97:17 117:12 130:21,23 151:17 159:24 164:2 thread 127:22 128:2,13 threat 119:12 threaten 114:5 threatened 116:1 three 17:8 34:5	39:16 48:7 53:11 60:7 65:1 66:25 69:9 74:16 80:10 85:19 91:8 92:7 94:9,12,23 97:5 110:12 132:25 133:9 138:4 149:16 164:16 167:10 Thursday 146:15 tied 169:9,25 tiger 47:9 84:18 till 16:25 102:17 168:18 time 2:2 5:13,17 20:22 21:8 22:17 31:18 32:22 37:8 39:1 41:19 51:13 52:3,16,20 53:14 54:22 57:15,15,18 57:19,21,25 58:3 58:6,7 59:22 60:12 62:13 63:13 72:16 80:20 81:1 81:2 85:5 86:2,2,2 93:2 100:20 101:4 101:9,9,23,25 102:1 104:11,11 111:4 112:2 115:25 116:17 119:21 127:24 128:11 130:1 134:13 147:8 152:24 153:7 155:2 158:14 160:1,2 161:3,8 162:16 163:3,8 164:2 168:14 169:2,5,10,10,11 169:11,13,15,17 169:20,23 timed 154:12 166:19 times 10:12 31:5,7 31:11 67:24 93:22	105:9 159:4 166:11 169:3 tiny 101:7,9 title 61:7,9,11,12 62:5 today 1:5 136:19 152:20 156:2 166:23 170:18 told 20:16 30:19 40:5,20,23 41:5 41:10 43:22,22,24 44:4 46:11,25 47:17 48:10 50:2 51:23 52:18,24,25 53:20,22,22 54:16 55:3,20,22 56:18 56:19 57:10,11 58:10 62:13 89:12 90:11,14,18 91:22 92:20,20,24 96:12 104:6 107:13 129:15 142:5 143:17 149:2 157:7 159:24 167:5,21 tolerably 3:24 Tolly 144:20,21 tomorrow 170:19 top 54:2 65:1,7,13 65:21 68:5 96:7 101:2 103:1 124:2 158:14 159:22 163:13 topic 118:15 total 5:24 totally 136:22 138:12 145:16 Totton 7:25 17:22 18:10 20:6 22:14 24:21 33:5,12,19 44:6 45:3,7,15 46:1 51:13 52:3,9 52:16,21 53:12,15 54:20,22 57:14 58:8 59:22 60:10	60:13,23 61:17,22 61:25 62:18 63:7 67:2,5,9 69:8,14 70:18,22 71:18 76:23 77:17 78:17 78:19 82:1,10,16 83:1,8,9,21 84:10 84:13,15,20 85:5 85:12 86:8,18 87:4 88:3,18 89:5 89:13,21 90:2,5 90:10,21,25 91:4 91:6,14,23 92:8 92:10,15,21 94:15 95:12,16 96:15 97:5 99:10 100:7 112:7 115:17 119:19 120:1 123:5 124:1 125:20 126:8,9 128:16,18,25 Totton's 21:19 47:8 55:5 85:15 115:18 127:24 128:10 touch 158:2 167:19 track 121:19 transcript 108:10 transfer 109:19 transit 6:3 152:17 157:4,9 165:4 travelled 115:19 treat 118:5,12 trial 62:11 63:21 70:23 92:9 111:18 111:20 117:3 trials 129:9 tried 25:13 81:21 162:22 triplating 10:13 trips 18:5 trouble 127:4 true 5:1 137:5,7,11 137:13 167:3 try 10:10 28:7,8 87:5 121:19 132:8
--	---	--	---	---

154:5	ultimately 28:22	vans 152:17 157:5	<hr/> W <hr/>	96:17 97:14,18,19
trying 21:5,21 22:3	32:17 74:10	157:9 165:9	W/373 126:14	124:2,19
49:5 54:15 85:25	unknown 150:9	various 91:9	waiting 153:4,20	Weatherby 101:13
113:7 150:10	underneath 14:18	112:15	154:2 168:18	101:14,18 103:1
151:12 155:18	24:13 43:22 55:4	vary 113:3	walk 123:24	106:22,25 107:23
160:5	55:21 61:13	vaults 92:7	walked 30:17 94:12	108:1,11 110:5
TSB 123:8 124:23	understand 2:1	Vauxhall 123:14	115:22	171:8
125:23	17:19 20:16 21:21	Vectra 123:14,16	walking 94:10	Wednesday 1:1
Tuesday 140:21	63:5 109:2 128:9	123:17,20 124:3	walkway 115:22	146:13
146:10	136:21 146:3	124:14,18	want 19:22 36:23	week 140:2 141:25
turn 7:19 46:17	154:5	vehicle 89:14,15	38:8 46:21 65:10	142:22 143:11
49:24 58:23 72:7	understanding	92:25 94:1,5,7,9	73:15 107:3,4	144:9,11 146:18
93:6 107:20 108:3	41:4	115:19 116:20	128:6 132:4,7	146:19
139:22 149:15	understands 8:12	123:4 124:6,7,14	134:9,22 141:15	weekend 140:16,17
turned 94:6	Understood 134:20	125:7 126:10	142:20 143:9	167:8
Turning 11:23	undertaken 23:4	vehicles 91:8	147:21 150:12	weeks 72:18 117:3
twice 3:15	148:3	123:13 125:5	152:19,20 162:16	weeks' 72:15
twin 18:12 99:12	undertaking 31:13	159:4	wants 79:9 121:22	welcome 134:24
two 14:2 21:12	unfortunately	verbatim 31:6	warning 28:3 29:4	135:7
27:13 33:11 34:12	25:15 117:22	113:17	29:22	went 62:11 63:21
34:14 35:8,11	uniform 5:13	verify 30:4	Warrington 160:20	94:9 123:5 124:18
42:12,13 45:6	unit 5:18,22,23 6:2	version 13:5 24:1	161:24,25 163:20	136:2 139:6
49:5,6,15 50:16	6:6,8 9:17 29:12	38:9,10	wasn't 31:1 36:12	145:12
50:16 54:8 56:24	29:12 30:22 34:18	view 94:6,9,11	36:15 63:23 76:21	whilst 140:3 155:1
57:11 66:12 74:13	64:16 122:18	131:7,8	79:20 80:25 81:2	Whyte 58:22 98:16
81:25 84:17 89:16	137:25 138:16	village 159:3	82:9 85:10,12	98:17,19 110:19
90:24 93:4 94:14	142:15 147:11	virtually 129:23	95:7 100:11 142:9	120:16,17,18
99:6 104:3 105:17	150:2 161:10	visited 125:22	155:7 164:8 167:7	127:21 129:4
116:7 117:3 125:5	unknown 94:18	168:15	waste 162:16	170:12,13 171:10
125:12 132:24	95:19 96:15 97:6	volume 13:17 72:8	watching 93:2	wide 148:4 149:13
136:7,21 138:10	unredacted 24:1	75:9	168:13	wider 78:22 81:20
138:10 140:17	unsigned 122:10	Vulture 27:16 41:1	water 125:9	82:13 83:21 84:3
143:8 156:1,11,24	unusual 128:6,8	51:18,24 52:9	way 9:1 12:6,21	85:4,8
157:19 161:14	unwell 1:5	55:4 57:18 58:5	25:17 29:23 44:25	Wilcock 67:15,15
164:10,16 168:14	update 142:15	60:25 61:13,19	47:20 49:12 61:13	67:20,20
two-thirds 122:25	144:22	62:8,16 63:7,18	82:14 84:5 85:14	winding 149:15
type 19:8 51:14	upheld 100:15	64:19 76:13 82:3	87:10,17 88:7	wish 125:17 132:15
52:4,22 53:16	use 79:10,13,22,23	82:17 83:4 84:11	98:4 101:24 123:1	132:16
54:23 59:23 60:14	119:16 120:9	84:16 88:11	137:15 142:13	withdrew 130:3
94:24 130:19	122:6 149:12,24	110:12,24 111:8	158:5 159:10,19	witness 1:10 2:9,12
typed 38:9 121:10	uses 79:11	111:16,17 113:13	161:10 169:3,8	2:15,17,20 3:3,13
122:11 157:20	usher 139:20	129:9 131:3,17	170:5	3:17,20 4:6,17,20
167:4 169:11	<hr/> V <hr/>	133:15 134:2	wearing 94:23,25	4:23 37:1,23,25
<hr/> U <hr/>	van 165:8	VW 97:4	95:4,5,11,13,14	38:14,19 40:2
			95:16,19,22 96:16	41:5,20 54:1,15

57:13 60:1,3,22 66:11 72:11 73:12 81:23 88:24 89:1 89:13 91:1 93:12 126:16 129:17 130:3,17,19 131:3 132:1,12,16,19,21 135:14,19 138:19 160:17 witness's 132:19 word 10:14 13:4,4 13:14,14 14:22,23 14:23 81:6 149:24 worded 152:18 wording 37:13 153:19 words 87:13,16 work 49:5,16,17 73:13 85:25 113:4 155:18 170:5 worked 5:8 112:22 122:18 138:9 154:4 156:9 162:18 working 20:6 33:6 64:12 100:25 119:23 137:21,24 146:19 147:8 workload 138:3 works 161:10 world 161:11 162:25 wouldn't 9:8 13:8 15:7 16:15,24,25 21:15 28:6,8,21 40:21 79:7 140:12 146:25 159:16 164:22 167:7 169:19 write 13:8 31:6 162:19 163:1 writes 48:21 167:23 writing 31:3,15 32:4,19 40:3 126:1 140:25	written 3:8 13:7 24:12 31:18,23 32:19 36:8 42:24 49:16 61:14 89:4 90:5,17 91:21 142:21 145:15 162:12 167:25 wrong 28:5,6,7,8 28:16 29:25 104:13 157:19,20 161:17 165:24 wrote 4:25 49:6 139:7 <hr/> X <hr/> X 171:3 <hr/> Y <hr/> year 89:18 123:11 years 5:9,10,23 27:9,13,16,25 29:7,8 30:15 33:7 36:6 47:14 83:11 83:15 137:18 146:2 151:12 164:21 168:4 years' 33:7 57:19 162:15 yesterday 43:22 126:16 <hr/> Z <hr/> <hr/> 0 <hr/> 09.10 163:14 <hr/> 1 <hr/> 1 2:9 42:24 44:1,4 44:17,18 68:1 69:9,23 70:5 99:10 135:13 139:1,9,11 144:18 171:5,6 1-1 65:14 1.00 123:15 1.05 98:13,22	1.10 144:15 145:1 10 4:17 5:10 14:7 39:23 67:6 69:16 72:5 114:15,15 115:14 130:11 134:10 137:25 138:12 144:16 145:2 148:18 10-second 150:17 10.00 144:17 10.30 1:2 166:5 170:19,23 10/11 5:9 100 141:8 158:19 161:6 101 171:8 10th 146:15 11 4:20 5:10 14:7 17:13 65:16 66:25 139:2,15 154:6 163:11 166:6,8 11.45 166:19 167:10 11.46 58:18 11.55 58:17 110 171:9 1100 65:21 1116 139:22 1123 140:22 1124 96:2 1154 70:14 1157 71:8 1160 70:25 71:13 1161 70:1 1163 70:1,3 71:16 1166 65:25 70:21 71:18 1167 68:9,9,10,12 73:25 74:2 1168 65:10,23 74:2 1168A 68:12 1168B 65:2,4,12,18 66:17,19 68:5 1169 66:19 73:20 73:21 74:22,23	1170 65:25,25 11th 140:7,13 141:2 144:13,14 146:6,16 12 4:12 6:3 31:25 42:7,9,10,20,21 50:1 123:2 124:25 12-year 45:6 90:24 12.04 58:20 12.14 66:4 12.20 66:6 120 171:10 1243 152:3 1244 151:19 1249 96:3,4,5,6 127 107:24 12th 38:4 140:14 140:19 141:3 143:16 13 2:9,13 14:3 59:9 59:13 93:13 130 163:11,13 166:3,8,18 131 154:13,14,15 168:5 132 154:6,11 135 171:11,12 1350 72:20,22 138668L 75:14 13th 140:14,19 141:3 143:16 14 15:1 67:20 70:12 73:2 107:24 140:20 14.25 154:16 168:5 1425 154:10,21 14th 140:14 141:4 143:16 144:24,25 145:3 15 43:15 56:4,6 80:3,5 88:25 140:3 155:24 15th 140:6,21 16 4:4 15:1 27:16 27:25 29:7 83:11	83:15 16.05 154:12,15 169:2 17 102:6 104:21 105:11,15,20 106:2 17th 105:13 18 2:21 4:10,15,25 32:2 38:3 42:10 46:11,25 121:3 18.27 97:3 18th 144:10,11 19 3:8,13 37:23 38:11 121:13 122:9 19/7/12 58:25 59:4 19/9/12 58:25 1986 137:17 1995 62:10 63:18 66:24 67:15,20 68:17 70:12 72:23 73:2 1995/1996 83:15 133:15 1996 5:6,10 57:19 57:19 58:5 62:10 63:19 66:25 67:6 67:10 69:16 72:4 72:5 75:14,17 82:20 114:1 1997 62:11,12 63:21 1998 44:9 89:7 1999 35:8 43:8 44:10 52:10 55:6 55:14 57:19 58:8 58:10 82:18,20 84:13 89:13 19th 38:4 1st 152:2 <hr/> 2 <hr/> 2 2:12 20:2 23:2,10 25:20,23 26:4 43:1 44:1,25 45:1
---	--	---	---	--

68:1,23 69:18 70:8 74:2 81:23 81:24,24 93:11 132:23 135:19,20 144:16 145:2 149:15,18,20,22 149:23 151:20 2.00 124:10 144:17 2.10 98:24 2.25 167:11 2.59 135:1 20 23:23 135:15 136:24 137:2,5 166:11,20 2000 6:1 34:2 35:11 43:8 48:1 52:12 52:13 53:8 55:11 55:13,16 57:16,19 57:21,25 58:1,4,6 59:18 62:14 81:13 82:8,18,20 84:15 2001 34:11 35:11 43:11 45:21 47:7 84:18 2002 45:15 91:23 2005 6:1 35:12 45:2 90:18 91:4 2006 5:11 6:7,7 83:14 91:12 123:2 2010 27:14 45:25 46:12 47:1 92:21 2011 23:23 100:22 137:21,25 139:25 2012 2:9,13 3:3,6,8 3:13 4:25 6:9 26:18 27:8 32:2 32:11,24,25 37:23 41:5 93:13,15 96:9 100:24 121:3 121:13 125:18 149:15,18 2013 3:18,21,24 132:24 2014 4:4,21 2016 135:15,20,21	136:24 137:19 2017 1:1 21 125:18 22 1:1 137:10 2311 80:3 2319 80:9 2321 43:20 56:22 80:5 88:25 2323 48:20 56:6 57:1 24 102:23 161:13 170:7 25 26:18 27:8 32:24 32:25 36:22 37:5 37:15,19 41:5 63:16 103:4 122:7 25th 102:3,6 105:13 107:8 26 3:3 104:4 106:15 108:7,14,25 122:19 137:19 26th 102:14,15 104:17,21 106:22 107:10 27 84:20 123:10,11 277215Y 72:22 28 3:6 124:9,22 28/8/12 58:24 29 125:8 29th 18:4 2nd 152:3,12	30 3:18,21,24 110:17 132:24 137:18 162:15 31 4:21 67:10 69:8 70:19 72:4 75:17 96:7,12 114:1 368 119:1 121:22 373 126:20 39 103:1 3rd 86:3 152:2	62 158:13 623 65:13 63 144:11,12 158:13,14 159:22 64 144:5	<hr/> 7 <hr/> 7 3:17 81:4,7 110:18 7.00 102:17 152:4 152:25	<hr/> 8 <hr/> 8 3:20 14:7 24:5 66:24 107:24 110:14,16 158:10 8.00 146:10 8.30 123:11 8.45 126:21 8th 146:10	<hr/> 9 <hr/> 9 4:4 14:7 67:15 68:17 144:18 9.00 146:7 158:8 159:24,25 9.10 158:14 160:15 163:5,5,25 164:1 99 171:7 9th 146:13	<hr/> 4 <hr/> 4 3:3 14:3 43:5,13 44:1 45:9 67:12 68:1 69:14 71:5,8 71:16,19,20 75:19 126:22 138:23,24 139:2,14 146:4 4.00 108:16 151:24 40 105:20 41 17:13 25:10 99:7 105:20 425 96:22 43 105:23 45 24:5,9 4th 140:13	<hr/> 5 <hr/> 5 3:6 14:7 37:21 38:6 58:23,24 67:14 68:3 81:22 120:21 5.30 102:17 54 146:6 5x5 167:13 5x5x5 153:14	<hr/> 6 <hr/> 6 3:12 38:8 53:5 59:3 60:2,5 67:18 68:1,25 73:6,22 74:24 88:24 105:24 106:2 122:4 135:20,21 137:9 144:2 6.29 93:25
	<hr/> 3 <hr/> 3 2:20 11:16 20:3 32:11,13 43:3 44:1 45:14,19,20 68:1 70:18,22 75:19,22 81:7 93:6,15 94:1 96:9 100:24 106:7,11 106:17 107:11 114:8 126:25 139:25 3.04 135:3 3.56 170:22								