

<p>1 Tuesday, 28 February 2017</p> <p>2 (10.32 am)</p> <p>3 THE CHAIRMAN: Yes, Mr Beer.</p> <p>4 MR BEER: Good morning, sir. Jessica Brown, please.</p> <p>5 THE CHAIRMAN: Thank you.</p> <p>6 MS JESSICA BROWN (sworn)</p> <p>7 THE CHAIRMAN: Right, now, Ms Brown, there is no need to be</p> <p>8 nervous, all right. Would you like to sit down?</p> <p>9 A. Yes, please.</p> <p>10 THE CHAIRMAN: All right. You sit down.</p> <p>11 Questions from MR BEER</p> <p>12 MR BEER: Ms Brown, my name is Jason Beer and I ask</p> <p>13 questions with Ms Cartwright who sits here on behalf of</p> <p>14 the Inquiry. Can you see in a bundle in front of you</p> <p>15 there, there should be a tab I which is your witness</p> <p>16 statement. If you just open that up, thank you.</p> <p>17 If you look at the beginning and the end of it, you</p> <p>18 will see that it is in your name and I think you have</p> <p>19 signed it on 12 December last year. Is that right?</p> <p>20 A. Yes, that's right.</p> <p>21 Q. Have you had a chance to read it recently?</p> <p>22 A. Yes, I have.</p> <p>23 Q. You have. Are the contents of it true to the best of</p> <p>24 your knowledge and belief?</p> <p>25 A. Yes, they are.</p> <p style="text-align: center;">Page 1</p>	<p>1 Q. You cannot remember their names?</p> <p>2 A. No.</p> <p>3 Q. What I am going to do is I am going to use your witness</p> <p>4 statement and take you through the events of that</p> <p>5 Saturday.</p> <p>6 A. Okay.</p> <p>7 Q. Then we are going to look at some other documents</p> <p>8 afterwards, okay?</p> <p>9 A. Okay.</p> <p>10 Q. Late afternoon/early evening, I think you were in a park</p> <p>11 in the village centre, is that right?</p> <p>12 A. Yes, that's right.</p> <p>13 Q. And you got a text from your mum saying to go home?</p> <p>14 A. Yes, I got a text about ten minutes before the incident</p> <p>15 happened saying that my mum wanted me home.</p> <p>16 Q. You are probably quite familiar with Culcheth. Don't</p> <p>17 tell us where you live, but are you from Culcheth?</p> <p>18 A. Yes.</p> <p>19 Q. For those of us that are not familiar I am going to try</p> <p>20 and work out where you were on a map. Can you be given</p> <p>21 bundle O1, please.</p> <p>22 Can we turn up, please, page 300A, it is the map.</p> <p>23 Thank you.</p> <p>24 You were in a park in the village centre?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 3</p>
<p>1 Q. Thank you very much.</p> <p>2 I think, back in March 2012 you were 15. Is that</p> <p>3 right?</p> <p>4 A. Yes, 15.</p> <p>5 Q. Sorry?</p> <p>6 A. Yes, I was 15.</p> <p>7 Q. On 3 March -- which was a Saturday -- you were in</p> <p>8 Culcheth with family and friends; is that right?</p> <p>9 A. Yes, that's right.</p> <p>10 Q. The people you were with, who were they?</p> <p>11 A. They were one of my friends, Rihana Benson, my sister</p> <p>12 Amy Brown and a couple of my other friends, but I can't</p> <p>13 remember who they were because I didn't really know them</p> <p>14 that well.</p> <p>15 Q. Right, okay. You have your sister, Amy, a friend,</p> <p>16 Rihana, and some friends. Were they girls or boys?</p> <p>17 A. They were all girls.</p> <p>18 Q. Just, if you look at the witness statement at</p> <p>19 paragraph 3 there, you say exactly that?</p> <p>20 A. Yes.</p> <p>21 Q. In the second line of paragraph 3 you say:</p> <p>22 "... and my friends Rihana Benson and ..."</p> <p>23 Is that supposed to say "three other girls", rather</p> <p>24 than "there other girls"?</p> <p>25 A. Yes, I think so, yes, three, yes.</p> <p style="text-align: center;">Page 2</p>	<p>1 Q. Can you point out to us on the plan where that is?</p> <p>2 A. It is in the village green. Next to the library, that</p> <p>3 is where I was.</p> <p>4 Q. Okay, so we can see a big green area in the middle</p> <p>5 called the "village green" which you call "the park"?</p> <p>6 A. Yes.</p> <p>7 Q. You said you were next to the library, or the park is</p> <p>8 next to the library?</p> <p>9 A. Yes, the park is near the library.</p> <p>10 Q. Okay, and whereabouts in the village green were you, can</p> <p>11 you remember?</p> <p>12 A. I was basically in the centre, the park is in the centre</p> <p>13 of it.</p> <p>14 Q. Okay. And you got a text from your mum saying, "Come</p> <p>15 home, please"?</p> <p>16 A. Yes.</p> <p>17 Q. I think dutifully you didn't go home?</p> <p>18 A. No, I was getting ready to go home.</p> <p>19 Q. You went to the chip shop?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And is that right -- I think it is your sister</p> <p>22 and her friends went to the chip shop, is that right?</p> <p>23 A. Yes, my sister and her friends went to the chip shop and</p> <p>24 I went to the newsagent's with Rihana.</p> <p>25 Q. Okay, so you split up effectively?</p> <p style="text-align: center;">Page 4</p>

1 **A. Yes.**
 2 Q. In your statement you call it "Culcheth newsagents"?
 3 **A. Yes.**
 4 Q. Can you point out on the plan where Culcheth newsagents
 5 is, please?
 6 **A. It is on the other side of the village green where the**
 7 **yellow -- where Common Lane is, it is on the other side**
 8 **of that.**
 9 Q. So you see the village green and it has Common Lane
 10 running down one side --
 11 **A. Yes.**
 12 Q. -- then it has the Warrington Road running down the
 13 other side of it, can you see that, the red road?
 14 **A. Yes.**
 15 Q. It has Lodge Drive running down the other side of it;
 16 can you see that?
 17 **A. Yes.**
 18 Q. Whereabouts is the Culcheth newsagents by reference to
 19 those three?
 20 **A. It is on the Common Lane, on the yellow one.**
 21 Q. All right, it is on the yellow one?
 22 **A. Yes, on the other side, it is opposite the park so it is**
 23 **on the other side --**
 24 Q. Is it on the same side of the road as the Cherry Tree
 25 and the Tiffin Indian and --

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1 **A. Yes.**
 2 Q. -- all of those shops?
 3 **A. Yes.**
 4 Q. Do you see the black square inside a khaki, dark green
 5 square, is it about there, in that run there?
 6 **A. Yes.**
 7 Q. You crossed the road and go into the Culcheth
 8 newsagents?
 9 **A. Yes.**
 10 Q. What were you doing in there?
 11 **A. We were in that shop for about two minutes just because**
 12 **Rihana wanted to get a drink before we went home.**
 13 Q. Okay. So a couple of minutes in the newsagents?
 14 **A. Yes.**
 15 Q. What did you do then?
 16 **A. We came back out to the shop and we were going to start**
 17 **heading home and then Rihana mentioned that she left her**
 18 **bag on the park, so we went to cross back over the road**
 19 **to go to the park and then that is when the incident**
 20 **started.**
 21 Q. Just, if you look at your statement, you will have to
 22 have two bundles open at the same time. At paragraph 5,
 23 you say:
 24 "We all left the park, Rihana and myself went to the
 25 shop, Culcheth newsagents, whilst my sister and my other

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1 three friends went to the chip shop."
 2 Which is what you have told us today?
 3 **A. Yes.**
 4 Q. "As I was walking to the shop from the park I crossed
 5 the road ..."
 6 Which is what you have told us today, yes?
 7 **A. Yes.**
 8 Q. "... and as I did I was looking towards the car park
 9 directly opposite me in Jackson Avenue."
 10 **A. Yes.**
 11 Q. "I didn't see anything on the car park that made me look
 12 twice, but I thought it was quieter than usual in that
 13 there were hardly any cars on the car park. Rihana and
 14 myself made our way into the shop."
 15 Yes?
 16 **A. Yes.**
 17 Q. When you were crossing over, you could see into the car
 18 park, could you?
 19 **A. Yes, you can see -- it is like adjacent,**
 20 **opposite/adjacent to me, you can see whenever you cross**
 21 **the road the car park is in view.**
 22 Q. Right, if we take out the same bundle that the plan was
 23 in and look at some photographs, if you can start please
 24 by looking at photograph 314, please, which might have
 25 a flag in it which says "1".

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1 Does that show the parade of shops that the Culcheth
 2 newsagents are in, ie the back of them?
 3 **A. It only shows the -- it only shows a couple of the**
 4 **shops, it doesn't show the newsagents where I was.**
 5 Q. Okay, so using the photograph, where is the newsagents
 6 that you were?
 7 **A. The house closest to the right-hand side of the picture,**
 8 **it follows all the way round and the newsagents is on**
 9 **that circle.**
 10 Q. I see. So if we look, please, at photograph 302 -- in
 11 fact 304 is a better one.
 12 THE CHAIRMAN: I am hoping that is that one?
 13 MR BEER: It is.
 14 THE CHAIRMAN: Thank you.
 15 MR BEER: Ms Brown, can you see the newsagents in that one?
 16 **A. Yes.**
 17 Q. Just describe to us where the newsagents is?
 18 **A. Where the building with the green shutters down, it is**
 19 **the one on the right-hand side of that.**
 20 Q. There is a silver car, or a white car, and then a black
 21 car parked at an angle?
 22 **A. Yes.**
 23 Q. There appears to be a fluorescent green poster in the
 24 window?
 25 **A. Yes, that is the newsagents.**

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<p>1 Q. That is the Culcheth newsagents?</p> <p>2 A. Yes.</p> <p>3 Q. In fact it is not in the same row of shops as the Indian</p> <p>4 Tiffin; is that right?</p> <p>5 A. Yes, it is on the same street but different parts of it.</p> <p>6 Q. You see at the bottom left-hand side of the picture</p> <p>7 there is the red brick building with the dark grey slate</p> <p>8 roof, is that the one which the Indian Tiffin is in?</p> <p>9 A. The Indian Tiffin is the white building with the grey</p> <p>10 slate roof.</p> <p>11 Q. With the grey slate roof? Thank you.</p> <p>12 A. Yes.</p> <p>13 Q. You crossed from the park to the left-hand side of this</p> <p>14 picture -- it is quite dark the grass as it has been</p> <p>15 photocopied -- and walked to the newsagents that you</p> <p>16 have described, yes?</p> <p>17 A. Yes.</p> <p>18 Q. So you could see, if you were looking right, into the</p> <p>19 car park or some of the car park. Is that right?</p> <p>20 A. Yes, you can see, just as the tree cuts off the end</p> <p>21 corner of the car park, you can see the rest of it but</p> <p>22 not that corner.</p> <p>23 Q. Okay, so if you are going in to the shop and you looked</p> <p>24 over your right shoulder, you could see most of the car</p> <p>25 park but not, for example, where the red car is at the</p> <p style="text-align: center;">Page 9</p>	<p>1 is and then Rihanna stated that she left her bag on the</p> <p>2 park and then at that point we turned around and started</p> <p>3 walking back towards the park.</p> <p>4 Q. So, on the photograph, you walked up to the postbox,</p> <p>5 Rihanna says she had left something in the park and what</p> <p>6 you walked across the car park that is there in front of</p> <p>7 the newsagents back over towards the park. Is that</p> <p>8 right?</p> <p>9 A. Yes.</p> <p>10 Q. That second time you saw the car park, did you notice</p> <p>11 anything in it?</p> <p>12 A. I saw the car with the engine on but other than that</p> <p>13 I didn't really see any other cars that looked unusual.</p> <p>14 Q. Right.</p> <p>15 You saw a car with its engine on?</p> <p>16 A. Yes, I also heard the engine running from when I first</p> <p>17 went into the shop because none of the other cars on the</p> <p>18 car park in front of me had their engines on so I knew</p> <p>19 it was from the other car park.</p> <p>20 Q. Okay, and where was this car with its engine on?</p> <p>21 A. I couldn't see the car with the engine on, I could only</p> <p>22 see the front bit of the lights so I am presuming it was</p> <p>23 somewhere near the back, near the corner that was cut</p> <p>24 off from me when I was in the shop.</p> <p>25 Q. You didn't actually see the car?</p> <p style="text-align: center;">Page 11</p>
<p>1 bottom left and the police tent and those cars that are</p> <p>2 parked up there?</p> <p>3 A. Yes.</p> <p>4 Q. You couldn't see those?</p> <p>5 A. No, I couldn't.</p> <p>6 Q. You said that you didn't see anything in the car park</p> <p>7 that made you look twice, nothing unusual at that point?</p> <p>8 A. No, I didn't.</p> <p>9 Q. Is that right?</p> <p>10 A. Yes.</p> <p>11 Q. But there were not many cars parked on it?</p> <p>12 A. No, normally at that time the car park is usually</p> <p>13 busier. That is why I thought it was a bit unusual that</p> <p>14 there were not that many cars in there.</p> <p>15 Q. Okay, and so you came out of the shop, and did you look</p> <p>16 at the car park again?</p> <p>17 A. Yes, I did.</p> <p>18 Q. You say in your statement that you always automatically</p> <p>19 look over at the car park when you leave the shop. Is</p> <p>20 that just because when you come out of the shop it is</p> <p>21 almost directly in front of you?</p> <p>22 A. Yes, it is just -- I always do it. Even still to this</p> <p>23 day, I do it now.</p> <p>24 Q. Where did you walk when you came out of the shop?</p> <p>25 A. We walked up a bit further up to where the red postbox</p> <p style="text-align: center;">Page 10</p>	<p>1 A. No.</p> <p>2 Q. Just look at your statement, if you would, please. It</p> <p>3 is in paragraph 12. You say:</p> <p>4 "At this time in the furthest corner of the car park</p> <p>5 from me I saw a dark coloured car, it could have been</p> <p>6 black or dark navy or dark blue."</p> <p>7 A. Yes, I saw -- that is the front bit of the car I saw</p> <p>8 with the engine running.</p> <p>9 Q. A moment ago you said that you couldn't actually see the</p> <p>10 car.</p> <p>11 A. I could see the front bit of the car as I was walking,</p> <p>12 as I came back out of the shop because as I looked</p> <p>13 directly across from me I could see more of the car</p> <p>14 park, because as we started walking up, that is when</p> <p>15 I saw the car.</p> <p>16 Q. Okay, so you could see the front of it --</p> <p>17 A. Yes.</p> <p>18 Q. -- and you could hear it?</p> <p>19 A. Yes.</p> <p>20 Q. Could you see the back of it?</p> <p>21 A. No, I couldn't. It was only when I got to the -- the</p> <p>22 postbox is when I saw, I think the back taillights were</p> <p>23 on of that car.</p> <p>24 Q. So you did see all of the car at some point then?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 12</p>

1 Q. The front, the middle and the back, yes?
 2 **A. Yes.**
 3 Q. What drew your attention to it?
 4 **A. Just the fact that it was stationary, like the car was**
 5 **not moving but the engine was still running and**
 6 **I thought that was quite odd. It was like the driver**
 7 **was waiting for somebody in the car.**
 8 Q. Using the picture that we have, can you tell us where
 9 this car was?
 10 **A. From where the red car, the bright red car in the car**
 11 **park is, it was about three spaces down from that?**
 12 Q. When you say "three spaces down", you mean three spaces
 13 closer to the newsagents?
 14 **A. Yes.**
 15 Q. Okay.
 16 So if it was three spaces down, in this picture, in
 17 fact, it is an empty space.
 18 **A. Yes, it is.**
 19 Q. Okay, so in between the green short car and the black
 20 longer car?
 21 **A. Yes.**
 22 Q. Yes?
 23 Now, you said, in your statement, that it was a dark
 24 coloured car, it may have been black, dark navy or dark
 25 blue, is that right.

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1 **A. Yes, only because it was dark outside as well so**
 2 **I couldn't exactly make out the colour of the car.**
 3 Q. Which way was it facing in terms of the space? Was it
 4 head on in up towards the green grass or was it facing
 5 with its rear towards the grass?
 6 **A. It was driven in, so the front bit of the car was nearer**
 7 **to the grass.**
 8 Q. Okay, so a bit like those two cars are parked there, the
 9 green one and the black one?
 10 **A. Yes.**
 11 Q. Could you see anyone inside it?
 12 **A. I could see someone in the driver's seat but I couldn't**
 13 **see anybody in the passenger's seat or in the back of**
 14 **the car because I think the windows might have been**
 15 **tinted because I couldn't see in the back of the car at**
 16 **all.**
 17 Q. What can you tell us, if anything, about the driver,
 18 what he or she looked like?
 19 **A. All I could tell was that he didn't have a beard or**
 20 **glasses on, and he had I think it was like dark coloured**
 21 **hair, a full head of hair.**
 22 Q. Did he have anything on his head?
 23 **A. No, he didn't.**
 24 Q. If we imagine the car in between that green one and that
 25 black one, facing in towards the grass, yes?

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1 **A. Yes.**
 2 Q. We can see where the red pillar box is, yes?
 3 **A. Yes.**
 4 Q. If you drew a line in your mind -- if you drew a line in
 5 your mind between the pillar box and a car in between
 6 the green one and the black one, you can see that from
 7 the pillar box there is, I think, a bin store surrounded
 8 by a fence with some trees in it in the way?
 9 **A. Yes.**
 10 Q. Would you agree that you couldn't really have seen the
 11 car from when you were at the pillar box?
 12 **A. I couldn't quite make out every aspect of the car, but**
 13 **I could see -- I could see like the basic features of**
 14 **the car.**
 15 Q. Where did you go then in order to be able to see it,
 16 because from the pillar box, certainly on this
 17 photograph, and obviously lines of sight are difficult
 18 to reconstruct when you are looking from above, but on
 19 the photograph at least, it looks like the bin store, as
 20 I have called it, and the trees, would be in the way, if
 21 you were looking from about where the pillar box is.
 22 **A. Yes, the path that -- the roof is covering about**
 23 **three-quarters of the path, so I was stood quite close**
 24 **to the card shop that is located there, so I could see**
 25 **straight past the trees but just not -- I couldn't see**

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1 **the full car from through the trees.**
 2 Q. I see, so you are saying that to the right of the pillar
 3 box, there is a flat roof in between the ground floor
 4 and the first floor --
 5 **A. Yes.**
 6 Q. -- which is covering sight of the path?
 7 **A. Yes, it is.**
 8 Q. You were to the right-hand side of the pillar box --
 9 **A. Yes.**
 10 Q. -- as we are looking at it now closer to a card shop
 11 which gave you a better view into the car park?
 12 **A. Yes.**
 13 Q. Yes?
 14 You see where the police van is with the man or
 15 woman in the white suit, and then the silver car and the
 16 red car and the black car, were any of those spaces
 17 occupied?
 18 **A. No.**
 19 Q. So it was a clear line of sight through to I think it
 20 would be space 4, counting from the bottom?
 21 **A. Yes.**
 22 Q. Could you see anyone else on the car park?
 23 **A. There were a couple of other cars at the -- towards the**
 24 **other end of the car park where the blue car is and the**
 25 **dark blue van I think, but none of the cars were**

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1 **occupied by anybody.**
 2 Q. Did you hear the engine revved at all? Do you know what
 3 I mean by 'revved'?
 4 **A. Yes. No, I didn't, it was just on.**
 5 Q. It was just idling?
 6 **A. Yes.**
 7 Q. You said you saw the front lights to start with and then
 8 the rear lights?
 9 **A. Yes.**
 10 Q. Is that as you moved on this photograph effectively from
 11 left to right beyond the pillar box and closer to the
 12 card shop?
 13 **A. Yes, I could see the front lights through the trees,**
 14 **that is how I knew they were from the same car because**
 15 **I saw the back taillights as well and there were no**
 16 **other cars parked on the other side of where the car**
 17 **was.**
 18 Q. You say in your statement that you thought the driver
 19 was just waiting for someone?
 20 **A. Yes.**
 21 Q. What made you think that?
 22 **A. Only because the engine was still running, so I thought**
 23 **he must be waiting for someone and then going to drive**
 24 **straight off again.**
 25 Q. This was after you had come out of the shop; is that

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1 right?
 2 **A. Yes.**
 3 Q. Did you see the driver out of the car at this time?
 4 **A. Not at that point, no.**
 5 Q. Did you ever see the driver out of the car?
 6 **A. Yes, I did.**
 7 Q. When did you see the driver out of the car?
 8 **A. He was still in the car by the time we got to the**
 9 **postbox and then, when Rihana said she left her bag on**
 10 **the park, as we turned back round I looked back one more**
 11 **time and I saw that the engine was now off and he was**
 12 **stood outside on the driver's side just leaning against**
 13 **the door.**
 14 Q. Where were you seeing that from, if you can describe
 15 from the photograph?
 16 **A. I was still where I was stood next to, right outside the**
 17 **card shop on the path, it was before we started walking**
 18 **back to the park.**
 19 Q. So it is obscured by this flat roof?
 20 **A. Yes.**
 21 Q. You said he was out of the car, and did you say he was
 22 leaning on it?
 23 **A. Yes.**
 24 Q. Okay.
 25 What was he wearing, can you remember?

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1 **A. All I can remember was that he had a dark hoody on.**
 2 **I can't really remember what pants he was wearing or**
 3 **anything.**
 4 Q. Okay, and anything on his head?
 5 **A. No. Not that I remember.**
 6 Q. Anything on his hands?
 7 **A. I don't remember.**
 8 Q. Anything else about his description that you can help us
 9 with?
 10 **A. No. Only what I have said is what I can remember.**
 11 Q. Okay.
 12 You started to walk back towards the park, when
 13 Rihana said that she had left something there?
 14 **A. Yes.**
 15 Q. Can you describe for us the route you took, please, just
 16 using the features set out on this photograph?
 17 **A. We just followed the path all the way back round the**
 18 **shops, because there were a couple of cars in the car**
 19 **park in front of us and we didn't really want to risk**
 20 **walking across the car park.**
 21 Q. You would have turned round, walked back up north on
 22 this photograph past the postbox, along where we can see
 23 that blue circle on a poster and a red circle on
 24 a poster. Is that right?
 25 **A. Yes. Yes.**

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1 Q. Carried on past that white "L"?
 2 **A. Yes.**
 3 Q. Turned right, turned left, walked back past Culcheth
 4 newsagents and then back past that orange shop, whatever
 5 that is?
 6 **A. Yes.**
 7 Q. What is that orange shop?
 8 **A. It is currently part of Sainsbury's, it used to be**
 9 **a wine shop.**
 10 Q. Right, okay, so you got to there and then when did you
 11 go?
 12 **A. We started to cross the road back to the park but we**
 13 **didn't actually make it across the road because that is**
 14 **when the incident started.**
 15 Q. When the incident started, are you referring to a bang?
 16 **A. Yes.**
 17 Q. Where were you when you heard the bang?
 18 **A. Where the white van is in the car park near the two**
 19 **police cars, that is the path I was stood on when**
 20 **I heard the first bang.**
 21 Q. You had come away from the orange shop and were in the
 22 sort of the mouth of the car park entrance there?
 23 **A. Yes.**
 24 Q. Okay.
 25 And you heard a bang?

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<p>1 A. Yes.</p> <p>2 Q. Was it a single bang or more than one?</p> <p>3 A. It was a single bang followed by two more.</p> <p>4 Q. What, if any, was the delay between the first bang and</p> <p>5 then the second and third?</p> <p>6 A. It was probably about five seconds.</p> <p>7 Q. Was there a delay between the second and third bang?</p> <p>8 A. No.</p> <p>9 Q. They came in quick succession?</p> <p>10 A. Yes.</p> <p>11 Q. It is very difficult to describe sounds but did they</p> <p>12 sound like the same thing that was making the bang or</p> <p>13 were they different types of noise?</p> <p>14 A. I would say the first bang was a lot louder than the</p> <p>15 second two, but the second two bangs sounded exactly the</p> <p>16 same.</p> <p>17 Q. Did you look to see where the bang or bangs were coming</p> <p>18 from?</p> <p>19 A. I turned around to look back at the car park but at that</p> <p>20 point we got ushered into the Indian Tiffin and got told</p> <p>21 that it wasn't safe to be outside.</p> <p>22 Q. Now, at that point, when you were where that white van</p> <p>23 is, which I think is a television van because we see on</p> <p>24 its roof a satellite broadcast dish, when you were</p> <p>25 there, you could see presumably part of the car park, if</p> <p style="text-align: center;">Page 21</p>	<p>1 only 15 at the time and they said it was not safe to be</p> <p>2 on the streets.</p> <p>3 Q. They were a couple you didn't know them --</p> <p>4 A. No, I didn't.</p> <p>5 Q. -- and you don't know who they are now?</p> <p>6 A. No.</p> <p>7 Q. They said to come inside the restaurant?</p> <p>8 A. Yes.</p> <p>9 Q. Looking at the photograph there, where did you go into</p> <p>10 the restaurant?</p> <p>11 A. Where the three police cars are in front of the white</p> <p>12 building, where the middle one is, that is where the</p> <p>13 entrance is and that is where we got taken in.</p> <p>14 Q. Okay, so if you just go backwards a couple of pages, to</p> <p>15 302, ie towards the front of the file, to 302, I think</p> <p>16 we can get a slightly blurred image, we can get</p> <p>17 an aerial view of the front of the Indian Tiffin, yes?</p> <p>18 A. Yes.</p> <p>19 Q. It is the middle police car there, is it, of the three</p> <p>20 that are at the top end of picture?</p> <p>21 A. Yes, the middle police car is directly in front of the</p> <p>22 entrance.</p> <p>23 Q. So you walked across that road, the mouth of</p> <p>24 Jackson Avenue --</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 23</p>
<p>1 you turned round --</p> <p>2 A. Yes.</p> <p>3 Q. -- but you certainly couldn't see the space where the</p> <p>4 dark coloured car had been parked?</p> <p>5 A. No. The Indian Tiffin was blocking the --</p> <p>6 Q. Blocking the view?</p> <p>7 A. Yes.</p> <p>8 Q. Did you notice anything else about the car park when you</p> <p>9 quickly looked round before you got ushered in?</p> <p>10 A. No.</p> <p>11 Q. Before you heard the bang, did you see any cars moving</p> <p>12 quickly or other loud noises?</p> <p>13 A. No.</p> <p>14 Q. Before you heard the bang, did you hear any shouting?</p> <p>15 A. No.</p> <p>16 Q. You said that you got ushered into the Indian Tiffin.</p> <p>17 A. Yes.</p> <p>18 Q. Was that after all three bangs or after the first or the</p> <p>19 second?</p> <p>20 A. It was after the first and as we was being ushered in</p> <p>21 I then heard the other two.</p> <p>22 Q. Who ushered you in?</p> <p>23 A. There was a couple I am presuming would have just left</p> <p>24 the Indian Tiffin from having a meal but then they went</p> <p>25 back in and took us with them because obviously we was</p> <p style="text-align: center;">Page 22</p>	<p>1 Q. -- on to the path and then into the Indian Tiffin?</p> <p>2 A. Yes.</p> <p>3 Q. What did you do, you and Rihana, when you were inside</p> <p>4 the Indian Tiffin?</p> <p>5 A. We got taken into a back room with quite a few other</p> <p>6 people and there was a little window on the wall, so</p> <p>7 I looked through that window and I could see on to the</p> <p>8 car park again, where the car was first parked when</p> <p>9 I saw it when I was in the shop.</p> <p>10 Q. For how long in total were you in the Indian Tiffin</p> <p>11 restaurant?</p> <p>12 A. I would say about 15 to 20 minutes.</p> <p>13 Q. You said a number of people were moved into the back</p> <p>14 room; is that right?</p> <p>15 A. Yes.</p> <p>16 Q. Using again that photograph at 302 -- in fact there is</p> <p>17 a better one if you look at 309, can you point out the</p> <p>18 room that you think you were in?</p> <p>19 A. Yes, where the stairs are, and there is a little white</p> <p>20 door, the door next to that, that is where the back room</p> <p>21 is.</p> <p>22 Q. I am not following at the moment. You see the diagonal</p> <p>23 staircase at the back of the restaurant?</p> <p>24 A. Yes.</p> <p>25 Q. If you go to the foot of that, there is what looks like</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

1 a small wrought iron fence?

2 **A. Yes.**

3 Q. Come left to that, there is a door in the middle?

4 **A. Yes.**

5 Q. Where in relation to that door in the middle with the

6 light above it were you?

7 **A. The little window that is next to the door, that was the**

8 **window I was looking out of in the back room.**

9 Q. Okay, so we have, in the left hand white building, the

10 door with the light above it to the left, as we look at

11 it, there is a small window with another small window

12 above it?

13 **A. Yes.**

14 Q. It was through that window?

15 **A. Yes.**

16 Q. What did you see?

17 **A. I saw the same car that I saw when I was at the shop but**

18 **this time I saw the man that was leaning against the**

19 **door, he was now lying on the floor.**

20 Q. Ms Brown, if you look at the photograph there, I think

21 we can see that between that window and where the dark

22 car was, there is a wooden fence, and another dwarf

23 wall, a brick wall, with a see through fence on it.

24 **A. Yes.**

25 Q. Could you see over the wooden fence?

Page 25

1 **A. I could see over the wooden fence because there was**

2 **boxes in the back room which I stood on to look out of**

3 **the top bit of the little window and that is how I saw**

4 **over the wooden fence and through the gate.**

5 Q. You said through the gate, where is the gate?

6 **A. Well, the green fence, the railings or whatever they**

7 **are.**

8 Q. Okay.

9 But you see the wooden fence, the one that is

10 running diagonally across the picture --

11 **A. Yes.**

12 Q. -- it goes down about a foot at a time by the look of

13 it --

14 **A. Yes.**

15 Q. -- almost sort of concertinaing down. How could you see

16 over the top of that to see somebody laying on the floor

17 of the car park?

18 **A. When I was stood -- when I was looking through the top**

19 **window of the little window, I could see over the third**

20 **panel in and through the railings, because the car was**

21 **in between the green car and the black car, it was more**

22 **towards the green car and the man was on the floor and**

23 **I could see his legs up and to his torso.**

24 Q. For how long did you observe the man?

25 THE CHAIRMAN: Sorry to interrupt. I see that the next

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1 photograph is actually slightly larger scale.

2 MR BEER: 310, thank you.

3 THE CHAIRMAN: You might find that more helpful in this

4 immediate context. Sorry, I didn't mean to interrupt.

5 MR BEER: Yes, thank you, sir.

6 Yes, it is the window under underneath "P-A" of "SPA

7 TO GO", yes?

8 **A. Yes.**

9 Q. Looking at this, it looks like that building is lower

10 down than the car park, can you see that?

11 **A. Yes.**

12 Q. You are telling the chairman you could see over the

13 fence on to the car park and saw somebody laying on the

14 floor?

15 **A. Yes, I only saw his legs up and to like the bottom half**

16 **of his torso.**

17 Q. Okay. Could you see whether it was the same or

18 a different man than you had earlier seen standing

19 leaning against the car?

20 **A. I couldn't tell.**

21 Q. For how long did you observe him?

22 **A. Only for about five minutes and then I got down and we**

23 **got took into the main part of the restaurant in the**

24 **Indian Tiffin.**

25 Q. To which side of the dark car was he laying?

Page 27

1 **A. He was lying on the driver's side.**

2 Q. Were his legs facing towards you or away from you?

3 **A. Towards me.**

4 Q. How could you tell it was a man?

5 **A. I couldn't from where I was looking. I only guessed**

6 **because I saw a man leaning against the car beforehand**

7 **and there wasn't any other cars on the car park.**

8 Q. You assumed that it was the same --

9 **A. Yes.**

10 Q. Yes.

11 I am just going to look to see whether there are any

12 other pictures that give a better view of your line of

13 sight.

14 It may be 311, the next one on. It is a slightly

15 different angle.

16 What was the room that you were in? What was its

17 purpose?

18 **A. It was just a store room for the restaurant.**

19 Q. Did you say anything else or did you say anything to

20 anyone else about what you could see?

21 **A. No.**

22 Q. Did the person, whose body the lower half of which you

23 could see, move at all in the five minutes that you

24 observed them?

25 **A. No.**

Page 28

1 Q. Did you see anyone approach the person that you could
 2 see?
 3 **A. No.**
 4 Q. In the five minutes, did you see any police cars?
 5 **A. No. But I could hear police car sirens outside.**
 6 Q. In the five minutes, could you see any police officers?
 7 **A. No.**
 8 Q. Forgive me a moment. (Pause)
 9 Did you say anything to Rihana about what you could
 10 see?
 11 **A. No, she was crying hysterically, so I didn't speak to**
 12 **her at all while we were in the Indian Tiffin.**
 13 Q. The car, could you see whether its lights were on or
 14 off?
 15 **A. They weren't, they were off.**
 16 Q. Could you hear enough to determine whether the engine
 17 was still running or not?
 18 **A. No, I couldn't hear.**
 19 Q. Because the window was shut?
 20 **A. Yes.**
 21 Q. Was the car in the same position as it was previously?
 22 **A. Yes.**
 23 Q. Could you see the hands of the person?
 24 **A. No.**
 25 Q. Was the person laying face down, face up or on their

Page 29

1 side?
 2 **A. Face up.**
 3 Q. So what, you could see the soles of their feet
 4 presumably --
 5 **A. Yes.**
 6 Q. -- and up to their torso, but not beyond it?
 7 **A. Yes.**
 8 Q. Did you observe anything else relevant at this time from
 9 the window in the back of the Indian Tiffin?
 10 **A. No.**
 11 Q. Did there come a time when you left the restaurant?
 12 **A. Yes. It was about 15 to 20 minutes later, but we were**
 13 **not allowed back down the street that we first started**
 14 **on, we had to go the other way.**
 15 Q. You had to come left out of the restaurant, is that
 16 correct?
 17 **A. Yes.**
 18 Q. And down Common Lane that way?
 19 **A. Yes.**
 20 Q. Did you go home?
 21 **A. Yes, I went straight home.**
 22 Q. Did you walk home?
 23 **A. Yes.**
 24 Q. As you were walking home, did you notice anything?
 25 **A. No. Not down the street I was walking.**

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1 Q. Did you see any police officers?
 2 **A. I saw two police officers walking towards me as I was**
 3 **walking home.**
 4 Q. Can you describe them?
 5 **A. One of them was about six feet tall, don't know how tall**
 6 **the other one was, and they both had dark hair but**
 7 **I can't remember the uniforms they had on.**
 8 THE CHAIRMAN: Male or female?
 9 **A. They were both male.**
 10 MR BEER: You said you cannot remember the uniforms, but did
 11 they have a uniform on?
 12 **A. I don't remember.**
 13 Q. How could you tell they were policemen?
 14 **A. They had their walkie-talkies and they were being spoken**
 15 **to and I heard them say "Officer".**
 16 Q. Did they have any weapons on them as far as you could
 17 see?
 18 **A. I couldn't see.**
 19 Q. Did you go home and tell your mum and dad what you had
 20 seen?
 21 **A. Yes.**
 22 Q. Did anything else significant happen that day, on the
 23 Saturday?
 24 **A. No.**
 25 Q. I think the next morning, at about 7.00, you went past

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1 the car park to do your job as a paper girl at the
 2 newsagents. Is that right?
 3 **A. Yes.**
 4 Q. Did you see some police tape around the car park where
 5 the car had been?
 6 **A. Yes.**
 7 Q. I think that day you spoke to some news organisations;
 8 is that right?
 9 **A. Yes.**
 10 Q. And spoke to a policeman; is that right?
 11 **A. Yes.**
 12 Q. Who did you speak to first, the media or the police?
 13 **A. I spoke to the media first.**
 14 Q. How did that arise? How come you spoke to the media
 15 first?
 16 **A. After I finished my paper round I went back home and**
 17 **then the manager of the newsagents rang me up and told**
 18 **me to come back because the news crew were outside.**
 19 Q. Is that Janet?
 20 **A. Yes.**
 21 Q. And she rang you to say come back?
 22 **A. Yes.**
 23 Q. Why was she saying to you to come back?
 24 **A. Because before I started my paper round me and my father**
 25 **were telling her what I had seen last night.**

Page 32

<p>1 Q. Is your father Andrew?</p> <p>2 A. Anthony.</p> <p>3 Q. Anthony, sorry.</p> <p>4 A. Yes.</p> <p>5 Q. You went back to the scene, is that right, after you had</p> <p>6 finished your paper round?</p> <p>7 A. Yes.</p> <p>8 Q. Can you remember which media organisations you spoke to?</p> <p>9 A. One of them was Manchester Evening News, Key 103 and</p> <p>10 I can't remember.</p> <p>11 Q. In your statement you say Sky.</p> <p>12 A. Oh, yes, Sky was outside, Sky was in the car park</p> <p>13 towards the end of the car park and then as I was</p> <p>14 leaving again they came up to me and said, "Do you mind</p> <p>15 speaking to us as well?"</p> <p>16 Q. Do you remember the BBC or the Daily Mail?</p> <p>17 A. No, I remember that after I went back home after the</p> <p>18 interviews, some other people turned up at my house to</p> <p>19 take my picture for the paper.</p> <p>20 Q. Did you speak with them then?</p> <p>21 A. They didn't ask me a lot of questions, only the basics</p> <p>22 of what happened and if I was okay.</p> <p>23 Q. Right. And at some stage on the Sunday, you spoke to</p> <p>24 a policeman is that right?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 33</p>	<p>1 THE CHAIRMAN: I don't think you have the right one there.</p> <p>2 I wonder, Mrs Shaw, if you could help Jessica, it is</p> <p>3 tab 4 in her bundle -- that is the right tab and it is</p> <p>4 the one with 74 at the bottom right.</p> <p>5 That is it, thank you.</p> <p>6 MR BEER: Can you see that this officer has made some notes</p> <p>7 on Sunday, 4 March 2012.</p> <p>8 A. Yes.</p> <p>9 MR BEER: This is PC John Riley, sir.</p> <p>10 THE CHAIRMAN: Yes.</p> <p>11 MR BEER: He has got, I think, "Anthony Brown" and then some</p> <p>12 details, and then, "Jessica Brown".</p> <p>13 A. Yes.</p> <p>14 Q. Was your father with you at this time?</p> <p>15 A. Yes, my father took me, my father helped me with the</p> <p>16 paper round that morning and then he came back with me</p> <p>17 when I was asked to go back to give the interviews.</p> <p>18 Q. He has written down, under your name:</p> <p>19 "In Costa Pizza at about [7.20 pm] 1920 hours ..."</p> <p>20 Firstly, what is Costa Pizza?</p> <p>21 A. Costa Pizza is the -- a pizza shop that is next to the</p> <p>22 Indian Tiffin.</p> <p>23 Q. Is it known as the Village Pizza?</p> <p>24 A. Yes, it is known as the Village Pizza now.</p> <p>25 Q. But it was previously called Costa Pizza --</p> <p style="text-align: center;">Page 35</p>
<p>1 Q. I think that was at the scene, wasn't it?</p> <p>2 A. Yes, it was.</p> <p>3 Q. Where in the course of that day was that, was that at</p> <p>4 the paper round or when you went back?</p> <p>5 A. It was at the paper round after I had given the</p> <p>6 interviews before I went back home.</p> <p>7 Q. Sorry, say that again.</p> <p>8 A. It was after I had given the interviews to the media</p> <p>9 that the policeman came up to me and spoke to me.</p> <p>10 Q. Okay, and whereabouts were you then?</p> <p>11 A. I was on the end of the other car park.</p> <p>12 Q. Which other one?</p> <p>13 A. Facing directly opposite to this car park.</p> <p>14 Q. Okay, so on the car park by the newsagents --</p> <p>15 A. Yes.</p> <p>16 Q. -- and the card shop? You remember giving him</p> <p>17 an account, it was a male, wasn't it, police officer?</p> <p>18 A. Yes, it was.</p> <p>19 Q. Do you remember him writing it down?</p> <p>20 A. Yes.</p> <p>21 Q. Did he ask you to sign anything, do you remember?</p> <p>22 A. No, he didn't.</p> <p>23 Q. I just want to look at what he has written down you told</p> <p>24 him, if that is okay. In this bundle here, it is tab 4,</p> <p>25 which is behind D. In the bottom right it is page 74.</p> <p style="text-align: center;">Page 34</p>	<p>1 A. Yes.</p> <p>2 Q. -- and I think locals called it "Costa Pizza" --</p> <p>3 A. Yes.</p> <p>4 Q. -- even though it had changed its name?</p> <p>5 A. Yes.</p> <p>6 Q. Okay.</p> <p>7 You said that it is next to the Indian Tiffin, and</p> <p>8 is it next to the China Rose restaurant as well.</p> <p>9 A. Yes.</p> <p>10 Q. Is it in between Indian Tiffin and China Rose?</p> <p>11 A. No, it is it is the Indian Tiffin and then China Rose</p> <p>12 and then the Village Pizza.</p> <p>13 Q. He has got written down:</p> <p>14 "In Costa Pizza at about 7.20 pm, heard sound of</p> <p>15 gunshot, couple ran into pizza parlour [if you go over</p> <p>16 the page], male and female, did not identify themselves</p> <p>17 as police. They told us to stand back against the wall</p> <p>18 as shooting was going on."</p> <p>19 Just stopping there, he has you down as saying that</p> <p>20 you were in the Costa Pizza at about 7.20 when you heard</p> <p>21 the sound of gunshot. Is that correct or incorrect?</p> <p>22 A. That is incorrect.</p> <p>23 Q. So you see, he has you down as being inside a building</p> <p>24 when you first heard the gunshots whereas you have told</p> <p>25 us you were out in the open about to cross the road,</p> <p style="text-align: center;">Page 36</p>

<p>1 yes?</p> <p>2 A. Yes.</p> <p>3 Q. So do you remember speaking to this officer?</p> <p>4 A. I remember speaking to the officer that morning but I do</p> <p>5 not remember saying that I was in Costa Pizza that</p> <p>6 night.</p> <p>7 Q. This account, you see, he hasn't recorded at least you</p> <p>8 saying that you saw the driver of the car leaning</p> <p>9 against it beforehand. Did you tell him about that?</p> <p>10 A. No, I didn't.</p> <p>11 Q. Okay. Any reason?</p> <p>12 A. No, just because he didn't ask about anything like that,</p> <p>13 so I didn't say anything.</p> <p>14 Q. I mean you have told us today that you saw somebody</p> <p>15 laying still for five minutes or so next to a car --</p> <p>16 A. Yes.</p> <p>17 Q. -- that was the same car that you had seen earlier --</p> <p>18 A. Yes.</p> <p>19 Q. -- after the sound of three gunshots.</p> <p>20 A. Yes.</p> <p>21 Q. If that is correct, you would have known about that when</p> <p>22 you were telling this police officer. Again, can you</p> <p>23 help why you didn't tell him about the man standing next</p> <p>24 to the car?</p> <p>25 A. Only because the policeman didn't ask if I saw anyone</p> <p style="text-align: center;">Page 37</p>	<p>1 two to three police cars after the first shot but before</p> <p>2 the second. Where were they?</p> <p>3 A. They were parked in -- one of them was parked in the car</p> <p>4 park where the newsagents was, and the other two were</p> <p>5 driving towards that parked police car.</p> <p>6 Q. If we go back to our photographs, please, and look at</p> <p>7 308, can you tell us where the parked marked police car</p> <p>8 was?</p> <p>9 A. It was where the white van is, near where it says</p> <p>10 "Dootsons LLP Solicitors", that is where the parked</p> <p>11 police car was and the other two were driving towards</p> <p>12 that one.</p> <p>13 Q. Okay, so that was parked, the marked police car, when</p> <p>14 you heard the first shot?</p> <p>15 A. Yes.</p> <p>16 Q. Was there anyone in it?</p> <p>17 A. I couldn't see.</p> <p>18 Q. Had that been parked there when you were by the postbox</p> <p>19 by the card shop coming into and then out of the</p> <p>20 Culcheth newsagents?</p> <p>21 A. Yes, it was.</p> <p>22 Q. That was there when you arrived on that car park and</p> <p>23 when you left it --</p> <p>24 A. Yes.</p> <p>25 Q. -- walking over back towards the park to get Rihana's</p> <p style="text-align: center;">Page 39</p>
<p>1 prior to the incident that happened, he just asked me</p> <p>2 where I was and what I was doing out on that day at that</p> <p>3 time.</p> <p>4 Q. Okay, this account has you saying that a couple came</p> <p>5 into the pizza parlour. Did that happen? A man and</p> <p>6 a woman that you didn't know running into the pizza</p> <p>7 parlour?</p> <p>8 A. No, it was only the couple that were outside that I saw,</p> <p>9 that came up to us and ushered us in.</p> <p>10 Q. They took you inside?</p> <p>11 A. Yes.</p> <p>12 Q. This account has them saying, "Stand with your backs</p> <p>13 against the wall". Did that happen?</p> <p>14 A. They did -- the couple did say to us, "Stand with your</p> <p>15 backs against the wall", but then after that we got took</p> <p>16 into the back room.</p> <p>17 Q. The record continues:</p> <p>18 "Saw four to five police cars driving round marked</p> <p>19 before the gunshot heard."</p> <p>20 Did you see four or five police cars driving around</p> <p>21 before the gunshot was heard?</p> <p>22 A. No, I saw two -- two to three police cars after the</p> <p>23 first shot, they were driving down and then after that</p> <p>24 I only heard police sirens.</p> <p>25 Q. I don't think you have told us about that so far, seeing</p> <p style="text-align: center;">Page 38</p>	<p>1 stuff?</p> <p>2 A. Yes. Yes.</p> <p>3 Q. Can you remember the type of police car?</p> <p>4 A. It was just the standard ones, like as you can see on</p> <p>5 the picture.</p> <p>6 Q. Okay, was it a car, a van or --</p> <p>7 A. It was a car.</p> <p>8 Q. A car.</p> <p>9 THE CHAIRMAN: I can see more than one white van actually</p> <p>10 near Dootsons. Do you mean the one that is very close</p> <p>11 to Dootsons to the left as we look at the picture --</p> <p>12 A. Yes.</p> <p>13 THE CHAIRMAN: -- on the car park for the shops?</p> <p>14 A. Yes.</p> <p>15 THE CHAIRMAN: Right, I see. Thank you.</p> <p>16 MR BEER: Did it have the -- I think it is called</p> <p>17 Battenberg, the yellow and the blue down the side of it,</p> <p>18 the reflective markings?</p> <p>19 A. Yes.</p> <p>20 Q. You don't happen to remember whether it was a Cheshire</p> <p>21 car or another police force, do you?</p> <p>22 A. No, I don't remember.</p> <p>23 Q. You don't remember?</p> <p>24 A. No.</p> <p>25 Q. Was it facing in, like that van is?</p> <p style="text-align: center;">Page 40</p>

1 **A. Yes, it was.**
 2 Q. Then you told us about two other cars driving towards
 3 that area. Were they marked police cars?
 4 **A. Yes, they were.**
 5 Q. Just describe the route that they took?
 6 **A. They came -- they turned in at the T junction and came**
 7 **straight up and then I didn't see if they actually went**
 8 **to the parked police car because after that I got took**
 9 **into the Indian Tiffin. So I only saw them driving up.**
 10 Q. You said the T junction there, do you mean the
 11 T junction of the car park or the T junction of the
 12 road?
 13 **A. The T junction of the road.**
 14 Q. Which direction did they come from, the right-hand side
 15 or the left-hand side as we are looking at it?
 16 **A. They came from the right-hand side.**
 17 Q. They came down Common Lane from the north -- if north is
 18 the top of this photograph -- and turned left?
 19 **A. Yes.**
 20 Q. And sirens on?
 21 **A. No.**
 22 Q. Blue lights on?
 23 **A. No.**
 24 Q. Anything else you noticed about the police cars?
 25 **A. No.**

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1 Q. Were they one behind the other?
 2 **A. Yes.**
 3 Q. They were driving down Jackson Avenue when you were
 4 asked to come into the Tiffin?
 5 **A. Yes.**
 6 Q. Going back to the account that PC Riley has written
 7 down, he has written down you then saying, "Heard three
 8 to four gunshots". Did you hear only three gunshots?
 9 **A. Yes, I only heard three.**
 10 Q. "After heard gunshots, saw males in black with gas masks
 11 and weapons run through car park towards Cherry Tree."
 12 **A. Yes, I did see that. There was about four men all**
 13 **wearing some type of gas mask running straight through**
 14 **the car park of the Cherry Tree.**
 15 Q. At what point did you see that?
 16 **A. That was as we were getting ushered into the Tiffin.**
 17 Q. Again, using the photograph on 308, whereabouts were the
 18 three to four men wearing gas masks?
 19 **A. They came through -- where the park is in the top**
 20 **left-hand corner, they came down that path, past the**
 21 **phone box and ran straight through on to the car park of**
 22 **the Cherry Tree.**
 23 Q. Okay, so looking at the middle left-hand side of the
 24 plan, there is a telephone box by a lamppost and there
 25 is a footpath going into the park. Do you mean they ran

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1 down that footpath or do you mean the one that is next
 2 to the road?
 3 **A. The one that is next to the road.**
 4 Q. Okay, so they were running along there, running left to
 5 right?
 6 **A. Yes.**
 7 Q. Describe where you were when you saw them?
 8 **A. I was inside the Indian Tiffin at the time when I saw**
 9 **them so I only saw them run down the path and past the**
 10 **front windows and then I didn't see them again.**
 11 Q. Okay, so which route did they take, did they cross over
 12 towards you?
 13 **A. Yes, they did.**
 14 Q. Where did they cross over?
 15 **A. They crossed, as the path leads into the road, they ran**
 16 **straight across that way.**
 17 Q. Okay, so carrying on effectively the diagonal line
 18 almost?
 19 **A. Yes.**
 20 Q. At what point in the incident was this? What had
 21 happened or was yet to happen when you saw this?
 22 **A. The three shots had already happened and it was just**
 23 **after we had been taken into the Indian Tiffin is when**
 24 **I saw them running.**
 25 Q. Thank you.

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1 Can I look then, please, at some of the reporting of
 2 the accounts that you gave to the media. Can we look,
 3 please, at tab 6 in that bundle. Can we start, please,
 4 at page 97, which is an account recorded in the
 5 Manchester Evening News.
 6 Can you see on page 98, which is the second page,
 7 about eight lines from the bottom, it says:
 8 "Speaking alongside her father, Jessica Brown, 15,
 9 said she was with friends in the Village Pizza takeaway
 10 in Common Lane when a couple came in and told them to
 11 stand back against the wall."
 12 Did you tell the media that?
 13 **A. No, I said Indian Tiffin on Common Lane.**
 14 Q. You see that this account is the same as the one that
 15 the police officer has written down, isn't it?
 16 **A. Yes.**
 17 Q. Then it says, "A couple came in and told them to stand
 18 with their backs against the wall".
 19 Again, that is wrong, isn't it, because you said
 20 that a couple ushered you in rather than --
 21 **A. The couple did say, "Stand with your back against the**
 22 **wall", but it was like ten seconds later that we got put**
 23 **into the back room of the restaurant.**
 24 Q. But the couple didn't come into the restaurant?
 25 **A. They came into the restaurant but they didn't come into**

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1 **the back room, they stayed in the main part of the**
 2 **restaurant.**
 3 Q. But you see this account is the same as the police
 4 officer has written down, isn't it?
 5 **A. Yes.**
 6 Q. It continues:
 7 "I didn't know them but they said to us to stand
 8 away so we were not heard or seen by anyone."
 9 Firstly, is that right, did the couple say that?
 10 **A. Yes.**
 11 Q. Do you remember telling the news media this?
 12 **A. No.**
 13 Q. Then it says:
 14 "I later looked out of the window and saw three
 15 people in black clothing with gas masks on and saw other
 16 people chasing them."
 17 **A. I did not say that I saw other people chasing them,**
 18 **I just said that I saw people with gas masks running and**
 19 **then other people running as well. But I didn't state**
 20 **that the people were chasing the men with the gas masks**
 21 **on.**
 22 Q. It continues:
 23 "She [that is you] said a large number of her
 24 friends were also congregated in a playground on
 25 Common Lane and many ran for cover towards the shopping

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1 precinct as the scene unfolded."
 2 Did you tell the media that?
 3 **A. I don't remember.**
 4 Q. "... one of her parents dashed to the takeaway to
 5 collect them."
 6 Did you tell the media that, that one of your
 7 friends came to the takeaway to collect you?
 8 **A. One of my friends' parents came but they didn't collect**
 9 **me.**
 10 Q. You walked home with Rihana?
 11 **A. Yes, I walked home with Rihana.**
 12 Q. Then it is recorded as you saying:
 13 "When we came outside there was gas in the air, you
 14 could smell it."
 15 **A. Yes, there was a distinct smell of gas just lingering in**
 16 **the air because the air did not smell like that before**
 17 **we went into the Indian Tiffin.**
 18 Q. Over the page:
 19 "Her father, Anthony Brown, said she arrived home
 20 hysterical, adding she was crying her eyes out barging
 21 through the door."
 22 Is that accurate, is that what you were like?
 23 **A. Yes.**
 24 Q. Then it continues to what your father said.
 25 In this account, it does not have you telling the

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1 media that you looked out of the window and saw a man
 2 laying still or a body laying still for five minutes.
 3 **A. No, I did not tell the media that.**
 4 Q. It does not have you, I think, hearing any gunshots.
 5 Did you tell the media about that?
 6 **A. Yes, I did.**
 7 Q. Can we turn then to an account recorded by the Guardian
 8 newspaper, that starts at page 100 in this bundle. Can
 9 you remember speaking to the Guardian newspaper?
 10 **A. No, I can't.**
 11 Q. Okay. Did each of the journalists identify to you where
 12 they were from?
 13 **A. I can't remember.**
 14 Q. Okay. The second paragraph from the bottom, Ms Brown,
 15 says:
 16 "Jessica Brown, a local schoolgirl, described how
 17 the shopping precinct in the quiet village turned into
 18 'the set of a horror movie' just prior to the fatal
 19 shooting."
 20 Did you tell the media that?
 21 **A. Yes, I did say that it felt like I was in a horror**
 22 **movie.**
 23 Q. "... Brown was enjoying a night out in a pizza
 24 restaurant in the centre of the village when she said
 25 'A couple ran in and said there was something going on.

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1 They told us to stand back against the wall."
 2 Did you tell this journalist that?
 3 **A. I can't remember.**
 4 Q. Again, this is the same or very similar to the account
 5 recorded in the MEN, the Manchester Evening News, and
 6 that given to the police officer, PC Riley, namely that
 7 you were in a pizza restaurant and a couple ran in and
 8 said there was something going on?
 9 **A. Yes, but that is not what happened.**
 10 Q. It continues:
 11 "The people in the shop got down on the floor to
 12 make sure they could not be seen."
 13 Did you tell this journalist that?
 14 **A. People did get down in the restaurant where I was but**
 15 **I do not remember telling the Guardian that.**
 16 Q. Over the page to 101, please, the record of your account
 17 continues:
 18 "There were loads of bangs from guns and people were
 19 running around outside screaming."
 20 Did you hear people running around outside
 21 screaming?
 22 **A. I heard people screaming and I saw people running**
 23 **outside, yes.**
 24 Q. But you couldn't say they were running around screaming?
 25 **A. No, I couldn't.**

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<p>1 Q. Then it says: 2 "I saw three men in gas masks with guns running, 3 followed by two other men." 4 Did you see men with gas masks and guns? 5 A. No, I only saw them with gas masks. 6 Q. Did you see the three men in gas masks being followed by 7 two other men? 8 A. Yes, but I am sure it was more than two other men. 9 Q. When did you see these two or more than two other men 10 following? 11 A. After the bangs had already happened. 12 Q. The account continues: 13 "Loads of police vans were parked across the road in 14 the car park. There were undercover police with guns 15 walking around." 16 Did you tell the journalist that? 17 A. I can't remember. 18 Q. Did you see any undercover police officers with guns 19 walking around? 20 A. I saw a couple of them but it was after we had been let 21 back out of the Indian Tiffin -- 22 Q. After it was all over? 23 A. Yes, after I was walking home. 24 Q. Then it says: 25 "Brown [that is you] was picked up by a friend's</p> <p style="text-align: center;">Page 49</p>	<p>1 105 -- and move to the Mail, please, on page 106. If we 2 go over to page 107, your account is picked up by the 3 top hole-punch: 4 "Jessica Brown, 15, said she was with friends in the 5 Village Pizza takeaway when a couple came in and warned 6 them to stand back against the wall." 7 Again, that is inaccurate, isn't it? 8 A. Yes, that is. 9 Q. Over the page, please: 10 "I later looked out of the window and saw three 11 people in black clothing with gas masks on and saw other 12 people chasing them." 13 Did you see people chasing the people in gas masks? 14 A. I did not say that they were chasing them, all I said 15 was that there were other people behind them running in 16 the same direction. 17 Q. "Then we came outside, there was gas in the air, you 18 could smell it." 19 You have told us about that? 20 A. Yes. 21 Q. Then: 22 "I then saw a black van with three or four people 23 inside drive towards the car park, one of them was 24 leaning outside the window and I later heard shots." 25 Did you tell the Daily Mail that?</p> <p style="text-align: center;">Page 51</p>
<p>1 father and as she was driven away she saw a black van." 2 Were you picked up by a friend's father? 3 A. No, I wasn't. 4 Q. It says that: 5 "As you were being driven away you saw a black van, 6 as it drove past I heard bangs coming out of it, there 7 were two or three other people in the van." 8 Did you see that? 9 A. No, I didn't. 10 Q. Did you tell the Guardian that? 11 A. I don't remember, I don't think so. Because I didn't 12 see it, I didn't see it happen, so I don't see why 13 I would say that. 14 Q. This has got I think people shooting or at least bangs 15 coming from a van that was being driven. You didn't see 16 that at all? 17 A. No. 18 Q. And then: 19 "I did not believe it was happening, it was like 20 an action film or the set of a horror movie, it was 21 unreal." 22 Did you tell the Guardian that? 23 A. Yes. 24 Q. Can we move on, please -- I am going to skip the account 25 of the Telegraph on pages 102 to 103 and to BBC, to 104,</p> <p style="text-align: center;">Page 50</p>	<p>1 A. No. 2 Q. Did you see a black van with three to four people inside 3 it drive towards the car park? 4 A. No. 5 Q. Did you see anyone leaning out of a black van -- 6 A. No. 7 Q. -- through the window and after that hearing shots? 8 A. No. 9 Q. In the account that you have given us today, there are 10 the following perhaps important elements or features. 11 You saw a car with the engine running, its lights on 12 front and rear -- 13 A. Yes. 14 Q. -- and it was on the car park, and at one point there 15 was a man, which you can broadly describe, standing up 16 against it. 17 A. Yes. 18 Q. Secondly, you were crossing the road walking away from 19 the car park, when you heard the bang and then followed 20 by another two in quick succession? 21 A. Yes. 22 Q. It was after the first bang that you were taken inside 23 the restaurant? 24 A. Yes. 25 Q. Then, lastly, inside the restaurant, you looked out of</p> <p style="text-align: center;">Page 52</p>

1 a small window and saw someone laying next to the car
 2 that you had seen earlier for about five minutes or so?
 3 **A. Yes.**
 4 Q. In the 2012 accounts, so the ones at the time, both to
 5 the police officer and to these news organisations,
 6 there isn't any record of you saying you had seen
 7 anything to note in the car park itself, is there?
 8 **A. Yes, that is correct.**
 9 Q. Is there a reason for that?
 10 **A. No, only because I wasn't asked specifically about it,**
 11 **so at the time, because I was in shock due to what**
 12 **happened, I just didn't mention it.**
 13 Q. Moreover, the 2012 accounts have you inside Costa's, or
 14 the Village Pizza, when the shots were fired, not
 15 outside it, both to the police officer and to these
 16 various media groups?
 17 **A. Yes.**
 18 Q. Can you help us as to how that has come about?
 19 **A. I could not tell you, I don't know. I didn't say it,**
 20 **but the only time I mentioned being in Costa was because**
 21 **my -- some of my friends were in Costa and I had seen**
 22 **them earlier that night, but I didn't go to them or**
 23 **anything.**
 24 MR BEER: Yes, thank you very much, Ms Brown. There may be
 25 some more questions.

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1 Sir, I don't know whether that is an appropriate
 2 moment, it depends how long people are going to be.
 3 MR THOMAS: I am not going to be very long.
 4 MR BEER: I think Ms Whyte says that she may be a little
 5 while.
 6 THE CHAIRMAN: Let's take a break. We will take a break.
 7 MR THOMAS: Sir, until when?
 8 THE CHAIRMAN: I am sorry, 11.55.
 9 (11.46 am)
 10 (A short adjournment)
 11 (12.03 pm)
 12 THE CHAIRMAN: Mr Thomas.
 13 Questions from MR THOMAS
 14 MR THOMAS: Ms Brown, let me introduce myself, my name is
 15 Leslie Thomas and I represent the Grainger family, okay.
 16 I only have a few questions for you, can I just take
 17 you back and just ask you just to clarify one or two
 18 things.
 19 We can see, I think this is in your bundle, that the
 20 first time a witness statement is taken from you is
 21 in December of last year, just a couple of months ago.
 22 **A. Yes.**
 23 Q. 12 December of last year, is when your witness statement
 24 is signed, yes?
 25 **A. Yes.**

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1 Q. Can I just clarify this aspect with you. Would I be
 2 right in thinking that after this incident occurred,
 3 nobody sought to put what you had seen down in a witness
 4 statement and ask you to sign it; is that correct?
 5 **A. Yes.**
 6 Q. Secondly. Do you remember Mr Beer was asking you about
 7 the police officer, PC Riley, who you spoke to, I think
 8 you were with your father.
 9 **A. Yes.**
 10 Q. And he was taking various notes, apparently, yes?
 11 **A. Yes.**
 12 Q. Yes, and an account was put to you. Can you just help
 13 the chairman with this. Was that account -- after that
 14 account had been taken, was it read back to you?
 15 **A. No. It was not.**
 16 Q. I think you have already said to Mr Beer that you didn't
 17 sign it?
 18 **A. No, I didn't.**
 19 Q. Thirdly, again, various accounts were put to you from
 20 various news media agencies, and Mr Beer took you
 21 through those this morning.
 22 **A. Yes.**
 23 Q. Same question, when you gave those various accounts to
 24 journalists, did you sign those accounts, as being
 25 accurate, what they were recording?

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1 **A. No, I was not asked to sign anything at all.**
 2 Q. Okay.
 3 Now, can I just move on to the final part of what
 4 I wanted to ask you about. What is your hearing like?
 5 **A. My hearing is fine.**
 6 Q. Yes?
 7 **A. Yes.**
 8 Q. And I assume -- has there been any change in your
 9 hearing today to what it was like when this incident
 10 occurred?
 11 **A. No.**
 12 Q. Your hearing is fine?
 13 **A. Yes.**
 14 Q. On the evening of this incident, you said, I think it
 15 was initially described as you heard bangs?
 16 **A. Yes.**
 17 Q. Yes. Is that how you described them initially "bangs"
 18 or "gunshot"?
 19 **A. No, I described them as bangs initially, yes.**
 20 Q. Bangs, okay.
 21 You heard three of them; is that correct?
 22 **A. Yes.**
 23 Q. Here is the question for you that I would like you to
 24 concentrate on. Before the first bang was heard, yes?
 25 **A. Yes.**

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<p>1 Q. Just remind the chairman, where were you when you heard 2 that first bang? 3 A. I was outside, about to cross the road back over to the 4 park. 5 Q. Okay. 6 Did you hear any shouts? 7 A. No. 8 Q. Did you hear any warning? 9 A. No. 10 Q. Did you hear anybody identify themselves as police? 11 A. No. 12 Q. Right. Now, I have limited my question, so far, to the 13 first bang, yes, just before the first bang, okay? 14 A. Yes. 15 Q. You have understood that; haven't you? 16 A. Yes. 17 Q. Just tell me this -- this is my final question -- at any 18 stage during the course of that evening when you heard 19 the bangs, at any point during the bangs, let me repeat 20 these questions, did you hear anybody shout or identify 21 themselves or give a warning that they were police? 22 A. No, I did not. 23 MR THOMAS: Thank you. 24 THE CHAIRMAN: Mr Weatherby? 25 Ms Whyte?</p> <p style="text-align: center;">Page 57</p>	<p>1 laptop that -- the sound cannot be played easily through 2 the sound system in the court. 3 MR BEER: As I understand it, no. 4 THE CHAIRMAN: Right. 5 MR BEER: Which is why -- 6 THE CHAIRMAN: Okay. 7 THE CLERK OF THE COURT: Can I just ask, is this an audio or 8 is this a video? 9 MR BEER: A video. 10 THE CLERK OF THE COURT: It is actually on video is it? 11 MR BEER: Sir, I suggest you rise. 12 THE CHAIRMAN: I will rise. 13 (12.26 pm) 14 (A short adjournment) 15 (12.31 pm) 16 MR BEER: Sir, I think Mr Grainger probably is back online. 17 THE CHAIRMAN: He is, yes. 18 MR BEER: We are going to use a laptop with Ms Brown. The 19 facilities did not allow for it to be played more 20 broadly. 21 THE CHAIRMAN: Yes, Ms Whyte, I am sorry. 22 MS WHYTE: I am more than content with that, if it saves 23 time. 24 THE CHAIRMAN: Is it set up for a laptop to play it? 25 MS WHYTE: I am going to use my laptop when the time arises.</p> <p style="text-align: center;">Page 59</p>
<p>1 MS WHYTE: Yes, but it does involve playing media. 2 THE CHAIRMAN: Do we have arrangements in place to do that? 3 MS WHYTE: I don't know that we do. I had understood that 4 it was going to be in place but I appreciate that 5 Mr Grainger's ability to listen in to proceedings may 6 interfere with our ability to play the media, so perhaps 7 that needs to be dealt with. 8 THE CHAIRMAN: I think the best thing to do is rather than 9 have people fiddling around with the electronics while 10 I am here I think I better give you a break and see what 11 you can set up. 12 MR BEER: Thank you, sir. 13 (12.10 pm) 14 (A short adjournment) 15 (12.25 pm) 16 THE CHAIRMAN: This is a 20-second clip or so, is it? 17 MR BEER: 25. 18 THE CHAIRMAN: 25 seconds and we have lost 25 minutes trying 19 to sort out the technology. It can be played on 20 a laptop, can't it? 21 MR BEER: It can do. 22 THE CHAIRMAN: What is wrong with that? 23 MR BEER: The ability of everyone to hear will be 24 significantly compromised. 25 THE CHAIRMAN: So it has to be, it is only the sound on the</p> <p style="text-align: center;">Page 58</p>	<p>1 THE CHAIRMAN: Okay, thank you. 2 Questions from MS WHYTE 3 MS WHYTE: Ms Brown, I ask questions on behalf of Greater 4 Manchester Police, my name is Anne Whyte. 5 I would just like to ask you some preliminary 6 questions first of all. 7 When did you connect the man on the ground that you 8 said you were watching for about five minutes with the 9 sound of bangs and references to gunshots, when did you 10 think, "Gosh, I wonder if those two things are 11 connected"? 12 A. It was more or less as soon as I saw the man on the 13 ground, only because I saw him earlier standing up fine 14 and I didn't just think he was just going to be lying 15 there. 16 Q. You must have thought, "Oh my, he might have been shot"? 17 A. Yes, I did -- thought the two of them were connected 18 somehow. 19 Q. Even though you think you saw a man on the ground who 20 you subsequently realised might have been shot, you 21 didn't mention that to a policeman who was asking you 22 questions -- 23 A. No. 24 Q. -- have I understood you correctly about that? 25 A. Yes.</p> <p style="text-align: center;">Page 60</p>

1 Q. I see.
 2 Can you tell us at what stage you became hysterical,
 3 use the word that was used in the context of your father
 4 in getting home.
 5 **A. It was when -- it was the journey from being in Tiffin
 6 back to my house, just because I was thinking about
 7 everything that had happened, like, at that moment in
 8 time I was just in shock really, so I didn't -- and then
 9 afterwards when I started thinking, that is when I
 10 became hysterical about it.**
 11 Q. Afterwards, on your way home?
 12 **A. Yes.**
 13 Q. Could you have another look in bundle O1 -- the bigger
 14 one, do you have a photo there? Could I ask you to look
 15 at I think it is 310, which should look like that, it is
 16 the corner of the car park, the red car and some other
 17 cars parked round it. We can see the back of part of
 18 the Indian Tiffin, it is 310 in my bundle. Do you have
 19 that, Ms Brown?
 20 **A. Yes.**
 21 Q. Thank you.
 22 As I have understood your evidence to the Inquiry,
 23 you were looking out of this window here, this ground
 24 floor window, which is just over to the left as we look
 25 at it of the metal railing fence, is that right?

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1 **A. Yes. Yes.**
 2 Q. The room was a store room. Can I ask you why you went
 3 in there?
 4 **A. They just took us in the back and said it would probably
 5 be safer if we are away from -- like as far away from
 6 outside as possible, so they took us into the back room.**
 7 Q. Okay, can you now, in the other bundle, I'm sorry to ask
 8 you to chop and change, could you go to tab 7 of the
 9 smaller bundle in front of you, and look at the second
 10 photograph.
 11 It should look like that.
 12 THE CHAIRMAN: Right at the back, the very last one.
 13 MS WHYTE: No, that is not the right page.
 14 THE CHAIRMAN: Right at the back of the whole bundle, the
 15 very last page in the bundle.
 16 MS WHYTE: It is the penultimate page.
 17 THE CHAIRMAN: It is the last in mine.
 18 MS WHYTE: The penultimate in mine.
 19 THE CHAIRMAN: Yes.
 20 MS WHYTE: Can I see what you are looking at, because
 21 I don't think --
 22 THE CHAIRMAN: No, that is not the right one, no.
 23 There we are.
 24 MS WHYTE: Thank you. Perfect.
 25 Turn it round so you can have a good look at it,

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1 Ms Brown.
 2 That grey building is the Indian Tiffin, isn't it?
 3 **A. Yes.**
 4 Q. On the corner of Jackson Avenue and Common Lane?
 5 **A. Yes.**
 6 Q. Can we see that attached, but separate, is
 7 an establishment which is different in colour and has
 8 a separate front door. Can you see that?
 9 **A. Yes.**
 10 Q. That, although it is very difficult to see from this
 11 photograph, has some signs on the front relating to
 12 a barbers, to grooming and to a chiropodist and podiatry
 13 establishment. Can you remember from your knowledge of
 14 Culcheth what that is or was at the time?
 15 **A. At the time it was all the Indian Tiffin because now the
 16 top part of the Indian Tiffin is now a different
 17 cocktail bar, but it was all one building at the time.**
 18 Q. If you look at photo that we looked at before, the fence
 19 to the Tiffin seems to divide the two properties at the
 20 rear, certainly on the outside. It might be different
 21 inside of course. There is a reference on the back to
 22 "SPA TO GO", do you know what that referred to?
 23 **A. No, I do not.**
 24 Q. You think that that window was part of the Indian
 25 Tiffin --

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1 **A. Yes.**
 2 Q. -- at the time?
 3 **A. Yes.**
 4 Q. I am going to ask you, please, to cast your mind back
 5 because you have been asked a lot of questions about
 6 what you might have told the policemen on the day after
 7 and what you might or might not have told reporters the
 8 day after, okay.
 9 **A. Yes.**
 10 Q. I have understood your evidence -- please correct me if
 11 I have understood it incorrectly -- to be that if
 12 a police officer thought you had said you had been in
 13 the pizza place with your friends when this all
 14 happened, or if journalists have recorded you saying
 15 that, they have that wrong?
 16 **A. Yes.**
 17 Q. You wouldn't have said that because that is not how it
 18 was?
 19 **A. Yes, I did say, in one interview, I did say that I was
 20 in Costa -- I did say I was in Costa Pizza, but then
 21 afterwards I did correct myself and say I wasn't meant
 22 to say I was in cost, I was in the Indian Tiffin, but
 23 that interview was shown on the news and they did not
 24 put in the part when I corrected myself, they only
 25 showed me saying it.**

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<p>1 MS WHYTE: I am going to ask you to look at that. 2 Just bear with me, sir. All right. 3 (Video footage was played to the witness) 4 MS WHYTE: Ms Brown, you have just been asked a lot of 5 questions by a number of different people about what you 6 told reporters and whether it might be right or wrong, 7 particularly about being in Village Pizza and nowhere in 8 any of those answers given this morning before the 9 break, and before trying to play that media, did you say 10 that you remembered saying it in some video footage 11 wrong and telling everyone about the correct version 12 after. 13 Can you help us with why you didn't mention that 14 before, given the type of questions you have been asked? 15 A. Sorry, I don't understand what you mean. 16 Q. When you made that short statement to the BBC, had you 17 already spoken to other media outlets? 18 A. No, I had not. 19 Q. Because I think this morning you could not quite 20 remember the number of outlets, and I don't think you 21 remembered speaking to the BBC? 22 A. No, I don't. 23 Q. But you remember now, do you? 24 A. Yes. 25 Q. And you remembered before I showed you that clip?</p> <p style="text-align: center;">Page 65</p>	<p>1 remember everything and ask about stuff. 2 Q. And your mum, is she called Amanda? 3 A. Yes. 4 Q. Do you remember her saying that, given your age, she 5 didn't want you to be involved and that she didn't want 6 you to provide a statement? 7 A. Yes. 8 Q. Can you remember, we have a note saying that that was on 9 7 March 2012, so four days after the incident, so the 10 following Wednesday, does that sound about right, that 11 they were coming round in the week after the incident? 12 A. Yes, they did come a couple of days after but I can't 13 remember the exact day or time or -- but they did come 14 round a couple of days later. 15 Q. The message sent back was, or what they were told is, 16 your mum didn't want you involved in any way and she 17 didn't want you providing a statement? 18 A. Yes. 19 Q. But obviously you are a bit older now, five years have 20 passed. Is that one reason why you are happy or content 21 to give a statement and come to the Inquiry today? 22 A. Yes. 23 MR BEER: Thank you very much. 24 For your reference, sir, the attempt is at G2, 25 page 2300. It is a report from Mark Bergmanski of the</p> <p style="text-align: center;">Page 67</p>
<p>1 A. Yes, only because you mentioned about showing media and 2 then I remembered the news did show something that 3 I said was wrong but they didn't show me when I was 4 correcting myself. 5 Q. If you did correct it, unfortunately from the 6 information we have available from the other media 7 outlets and a police officer, they don't seem to have 8 been aware of your correction. Would you agree with 9 that? 10 A. Yes. 11 MS WHYTE: Thank you very much. 12 Thank you, sir. 13 MR BEER: Just one last question from me. 14 Further questions from MR BEER 15 MR BEER: You were asked questions by Mr Thomas, who sits 16 second in from the end there, about whether you had 17 given a previous account before the Inquiry approached 18 you in December 2016. Do you remember, and you said you 19 hadn't? 20 A. Yes. 21 Q. Do you remember your mum or your dad saying that 22 an organisation called the Independent Police Complaints 23 Commission had come round to try and take an account 24 from you? 25 A. Yes, someone did come round and try and like get me to</p> <p style="text-align: center;">Page 66</p>	<p>1 IP -- 2 THE CHAIRMAN: I remember reading it. 3 MR BEER: Thank you, sir. 4 THE CHAIRMAN: Thank you, Mr Beer. 5 Questions from THE CHAIRMAN 6 THE CHAIRMAN: Was your father present when you gave that 7 interview to the BBC? 8 A. Yes. 9 THE CHAIRMAN: Is he the man shown in the picture standing 10 next to you? 11 A. Yes. 12 THE CHAIRMAN: Was he present when the policeman spoke to 13 you? 14 A. Yes. 15 THE CHAIRMAN: Was he present when the other media people 16 spoke to you? 17 A. Yes. 18 THE CHAIRMAN: You had been in the park with some friends, 19 hadn't you? 20 A. Yes. 21 THE CHAIRMAN: At that time you were only 15, weren't you? 22 A. Yes. 23 THE CHAIRMAN: At the time, had you been anywhere that 24 evening or with any friends that your dad or your mum 25 might not have liked you to go or to be with?</p> <p style="text-align: center;">Page 68</p>

<p>1 A. No.</p> <p>2 THE CHAIRMAN: All right. Your mum had asked you to come</p> <p>3 home?</p> <p>4 A. Yes.</p> <p>5 THE CHAIRMAN: Was that because of the time or something</p> <p>6 else?</p> <p>7 A. Yes, it was because of the time.</p> <p>8 THE CHAIRMAN: I see, okay.</p> <p>9 Thank you. That is all, thank you for helping the</p> <p>10 Inquiry. You are free to go.</p> <p>11 A. Thank you.</p> <p>12 MR BEER: Sir, I wonder whether you would consider rising</p> <p>13 until just before 2.00.</p> <p>14 THE CHAIRMAN: Yes.</p> <p>15 MR BEER: Then we will have a fresh start with the witness,</p> <p>16 Mr Bailey.</p> <p>17 THE CHAIRMAN: Yes, shall we say 1.55 or would you prefer --</p> <p>18 that clock is actually slow.</p> <p>19 MR BEER: 1.50 would be better.</p> <p>20 THE CHAIRMAN: Are we going to get through the other two</p> <p>21 witnesses this afternoon?</p> <p>22 MR BEER: Yes, we are.</p> <p>23 THE CHAIRMAN: Thank you. 1.50 pm then.</p> <p>24 (12.44 pm)</p> <p>25 (The Luncheon Adjournment)</p> <p style="text-align: center;">Page 69</p>	<p>1 A. No, I am currently now currently a chief superintendent.</p> <p>2 Q. Thank you. In front of you is a bundle that contains</p> <p>3 the witness statement you provided. Can I ask you to</p> <p>4 turn, please, behind tab 1.</p> <p>5 A. Yes.</p> <p>6 Q. We can see there the witness statement that you provided</p> <p>7 dated 27 July 2012. Have you had an opportunity to</p> <p>8 consider that witness statement before attending today?</p> <p>9 A. Yes, I have.</p> <p>10 Q. Can ask you to confirm are the contents of that witness</p> <p>11 statement true to the best of your knowledge and belief?</p> <p>12 A. Yes, they are.</p> <p>13 Q. Thank you. You tell us in your statement, as I have</p> <p>14 already covered, that you were a police superintendent</p> <p>15 in March 2012. Can you assist as to how long you had</p> <p>16 been performing your duties at that rank?</p> <p>17 A. I was a temporary superintendent from 1 January that</p> <p>18 year.</p> <p>19 Q. Thank you. You also tell us on 1 March 2012 you were</p> <p>20 performing the duties of the silver commander, the TFC?</p> <p>21 A. Yes.</p> <p>22 Q. For how long in March 2012 had you been a silver</p> <p>23 commander?</p> <p>24 A. I had commenced those duties 1 January 2011.</p> <p>25 Q. Thank you.</p> <p style="text-align: center;">Page 71</p>
<p>1 (1.50 pm)</p> <p>2 THE CHAIRMAN: Mr Thomas, I think you are aware that</p> <p>3 Mr Stuart Grainger is not yet back, I suspect it is to</p> <p>4 do with the early start this afternoon. I don't think</p> <p>5 that this afternoon's evidence is so critical in his</p> <p>6 case that he needs to hear every word of it.</p> <p>7 MR THOMAS: We can crack on.</p> <p>8 THE CHAIRMAN: You are happy with that are you? Thank you.</p> <p>9 We will do that then.</p> <p>10 MS CARTWRIGHT: Thank you, sir, can I call then, please,</p> <p>11 Nicolas Bailey.</p> <p>12 THE CHAIRMAN: Thank you.</p> <p>13 MR NICOLAS BAILEY (sworn)</p> <p>14 THE CHAIRMAN: Thank you, Mr Bailey, you are very welcome to</p> <p>15 sit down if you would like as this is an Inquiry and not</p> <p>16 strictly a court proceeding.</p> <p>17 Questions from MS CARTWRIGHT</p> <p>18 MS CARTWRIGHT: Good afternoon, Mr Bailey. My name is</p> <p>19 Sophie Cartwright I ask questions on behalf of the</p> <p>20 Inquiry. Could I ask you first of all to confirm your</p> <p>21 full name.</p> <p>22 A. Yes, Nicolas Carl Bailey.</p> <p>23 Q. Thank you, and in 2012 you were a police superintendent,</p> <p>24 are you still performing your duties in that rank and</p> <p>25 role at Cheshire Police?</p> <p style="text-align: center;">Page 70</p>	<p>1 In total how long had you been a police officer with</p> <p>2 Cheshire Police?</p> <p>3 A. At that time, five years ago, 23 years.</p> <p>4 Q. Thank you.</p> <p>5 By way of background, can you tell us on</p> <p>6 1 March 2012, which was a Thursday, you were performing</p> <p>7 the duties of a TFC between 7.00 am and 7.00 pm.</p> <p>8 A. That's correct.</p> <p>9 Q. You would be handing over then to Chief Inspector</p> <p>10 Crowcroft?</p> <p>11 A. Yes.</p> <p>12 Q. Could I ask you to deal with the relevant contact in</p> <p>13 respect of Operation Shire. You tell us that at 2.53 pm</p> <p>14 you received a mobile telephone call from DCI</p> <p>15 Mike Lawler from GMP. Could you tell us, please, about</p> <p>16 that call and what was said to you?</p> <p>17 A. To the best of my knowledge it was a call from DCI</p> <p>18 Mike Lawler contacting me in my role as the silver</p> <p>19 commander for Cheshire Police during that period, and he</p> <p>20 had information of a police operation that Greater</p> <p>21 Manchester were running, and had been running for</p> <p>22 a period of time, I can't recall how long he said it was</p> <p>23 running for. And there was a chance that that</p> <p>24 operation, which was a mobile armed support to</p> <p>25 surveillance, would come across the border from Greater</p> <p style="text-align: center;">Page 72</p>

1 **Manchester into Cheshire at some time in the near**
 2 **future, that evening potentially.**
 3 Q. You tell us in your witness statement that you made
 4 notes as you were receiving the call, and perhaps if we
 5 take you to the notes that we can see in tab 2, please.
 6 I am using the internal pagination, please, if we can
 7 turn, please, to page 8.
 8 **A. Yes.**
 9 Q. Perhaps if you can read through the note, please, we can
 10 see the start of it, the call is timed as you have set
 11 out in your statement as 2.53. Would you have been
 12 recording these notes as you were on the phone to
 13 Mr Lawler?
 14 **A. Yes, these will have been just brief notes, yes, to**
 15 **remind myself as to what he was saying.**
 16 Q. Can you read the first few sentences please of the entry
 17 you made at that time?
 18 **A. Yes:**
 19 **"DCI Mike Lawler, GMP [a mobile telephone number]**
 20 **Op Shire. A team of armed villains, Salford, recesses in**
 21 **Lancs, Staffs, armed robberies at banks or CIT."**
 22 Q. Thank you, pausing there for a moment, you specifically
 23 record, "Team of armed villains". Were those the words
 24 used by Mr Lawler or is that a gloss you have applied to
 25 what was said to you at that time?

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1 **A. I would imagine the writing there would be a phrase he**
 2 **has used, but I can't be for certain sure but I would**
 3 **imagine it is a phrase that I will have taken direct**
 4 **from the call.**
 5 Q. We can see there is then a reference to recesses in
 6 Lancashire, Staffordshire and armed robberies, banks or
 7 cash in transit. Can you give us any more detail about
 8 what Mr Lawler was telling you at that time?
 9 **A. I think -- well, as I recall it was about a group of**
 10 **males, a group of criminals or suspects or males who had**
 11 **been involved the past and were now believed to be**
 12 **carrying out reconnaissance on properties which they**
 13 **might be looking to make, to have robberies at.**
 14 Q. We don't see recorded in your entry any other name other
 15 than later on there is reference to Totton.
 16 **A. That's correct.**
 17 Q. Do you recall whether any other names were provided to
 18 you at that time as to who the villains were that GMP
 19 were interested in?
 20 **A. No, I think that will have been the one name that I was**
 21 **given.**
 22 Q. We can see in the notes -- in fact I think that the note
 23 where it references Totton is not till a later note.
 24 **A. No, no, it is just to the back end of it, it just says**
 25 **nominals.**

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1 Q. Totton.
 2 If Mr Lawler had just given the names of other
 3 nominals, would you have recorded those in your note?
 4 **A. Depending on the speed at which he was talking at that**
 5 **time, I wouldn't have necessarily tried to take the**
 6 **details of all the individuals' names, but I would have**
 7 **tried to write some names down.**
 8 Q. Thank you. Can we then go back, please, to page 8. We
 9 can see your note then records "I", is that then meant
 10 to relate intelligence, "Intel carried out,
 11 Culcheth Parade shop". Can you expand at all on the
 12 entry there?
 13 **A. To the best of my recollection is that they had**
 14 **intelligence that the group had carried out a check on**
 15 **the parade of shops in Culcheth. That is, you know ...**
 16 Q. Can we then turn, please to the next line where there is
 17 an "A?", what does that represent?
 18 **A. My recollection, that "A" would have normally been**
 19 **an action.**
 20 Q. Yes.
 21 **A. So, I guess for me, I have had a look at it since, more**
 22 **recently, "Stolen car in GMP and going to use", whether**
 23 **there is an action there for us to check, but I can't**
 24 **recall now what that A for action stands for now.**
 25 Q. Can you help us at all what the question mark next to

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1 the A for action would mean?
 2 **A. Unless it is for me to do some checks as to whether**
 3 **I have nominated -- whether later on I would have**
 4 **expected myself to make sure somebody was aware of it,**
 5 **but I can't recall.**
 6 Q. We can see then, following on from the A and the
 7 question mark, you have recorded "Stolen car in GMP, and
 8 going to use ..." Then an arrow from the "Stolen" to
 9 "Audi" and then the word "technical", A4 and the
 10 registration number "R008 UOD". Can I ask you in terms
 11 of the "technical", what that is to represent or to
 12 mean?
 13 **A. That would in my mind be some kind of device on the**
 14 **vehicle to track the vehicle when it is moving.**
 15 Q. Can you assist in terms of when Mr Lawler told you that
 16 there was a tracking device, or a technical, on the
 17 Audi, anything else he told you at that time about it?
 18 **A. That this, these notes were made after that call, so**
 19 **everything was in that one conversation.**
 20 Q. Yes.
 21 **A. From this call.**
 22 Q. Can I ask you, do you recall whether or not Mr Lawler
 23 told you about whether or not they had been able to get
 24 information from the technical to identify previous
 25 occasions prior to 1 March, when the vehicle had

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1 travelled to Culcheth?
 2 **A. I -- it is possible but I can't say for certain, I can't**
 3 **say.**
 4 Q. Can I ask, if Mr Lawler had provided details to you of
 5 a previous trip to Culcheth, with dates, is it likely
 6 that would be something that you would have recorded?
 7 **A. Quite possibly -- I am just looking at the rest of my**
 8 **notes. It is possibly something that would have been**
 9 **recorded, but I can't say for definite one way or the**
 10 **other, I am afraid.**
 11 Q. But certainly, Mr Lawler has told you there is
 12 a technical device fitted to the stolen car?
 13 **A. Yes.**
 14 Q. Did you understand from that that GMP then would have
 15 the ability to tell you when that vehicle was on the
 16 move?
 17 **A. Yes, I did, yes.**
 18 Q. We can then see that you have recorded, after the
 19 reference to the vehicle, is it, "... in robbery, not
 20 sure when"?
 21 **A. Yes. Yes.**
 22 Q. Should the whole sentence read, "Stolen car and GMP and
 23 going to use the Audi technical in robbery, not sure
 24 when"?
 25 **A. Yes.**

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1 Q. It was a link of that vehicle to GMP's belief it was to
 2 be used in a robbery?
 3 **A. Yes.**
 4 Q. Then you have recorded:
 5 "Anticipate job late tonight or early tomorrow
 6 morning."
 7 Again, is that information that was directly
 8 provided from Mr Lawler?
 9 **A. Yes, he will have. Yes.**
 10 Q. Do you recall whether he expanded at all and gave you
 11 any details as to why GMP had that belief?
 12 **A. Off the top of my head, I don't recall how he said he**
 13 **knew that information.**
 14 Q. Okay.
 15 Then we can see you have recorded, "Plan to MASTS
 16 and strike".
 17 THE CHAIRMAN: Is it "plan", or is it something else?
 18 **A. I think it is "plan".**
 19 THE CHAIRMAN: It is "plan", is it?
 20 **A. Yes.**
 21 THE CHAIRMAN: Thank you.
 22 MS CARTWRIGHT: "Plan to MASTS and strike ..."
 23 Then what is the --
 24 **A. "... and ..."**
 25 Q. "... and if two or more get in vehicle ..."

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1 **A. "... We will strike."**
 2 Q. Just to be clear, is that directly what Mr Lawler said
 3 to you at that time, if two or more get in vehicle, the
 4 plan for GMP was that they would strike?
 5 **A. That is what I have written down, yes.**
 6 Q. We can then see over the page on page 9 you have
 7 recorded contingency, again is this Mr Lawler telling
 8 you the contingency if they were unable to strike when
 9 there were two or more in the vehicle?
 10 **A. Yes.**
 11 Q. You have recorded, "Contingency if unable to strike
 12 where they lay up". Is that sort of the end of the
 13 information relating to that?
 14 **A. Yes, I can't say -- my understanding was that they would**
 15 **have a contingency if they were unable to set up there,**
 16 **yes.**
 17 Q. Then we can see a number of premises that you have
 18 recorded in your note, do you recall the context had
 19 been given for those premises?
 20 **A. They were something to do with premises at**
 21 **Culcheth Parade of shops.**
 22 Q. You have specifically recorded Thomas Cook,
 23 NatWest Bank, Sainsbury's and Cheshire Building Society?
 24 **A. Yes.**
 25 Q. Was that the complete list that was provided to you at

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1 that time?
 2 **A. I don't know. That was the list that I remember.**
 3 Q. Okay.
 4 Are you able to help us then with the next entry
 5 where you have recorded, "Had a hacksaw yesterday". Do
 6 you recall what Mr Lawler told about the hacksaw and the
 7 significance of the hacksaw?
 8 **A. I can only surmise based on that one line that based on**
 9 **what he had said earlier that the team had intelligence**
 10 **that they had carried out intel carried out**
 11 **Culcheth Parade shops earlier on in my reference, linked**
 12 **to that and on that occasion they had a hacksaw with**
 13 **them.**
 14 Q. Yes.
 15 Then we can see your note continues, "Previous ..."
 16 Is it "broke in"?
 17 **A. Yes, and would lay in wait, yes.**
 18 Q. Can you tell us anything more about what that previous
 19 was that was provided to you by Mr Lawler?
 20 **A. I think that was some suggestion that on previous**
 21 **occasions the suspects had carried out that as**
 22 **a motive -- as a method.**
 23 Q. Do you recall whether Mr Lawler gave you any details as
 24 to who it was that had done that, whose method it had
 25 been? Was it just a general suggestion?

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1 **A. Yes, I can't remember. The only name I've got there is**
 2 **Totton, so that was the only one I could recall.**
 3 Q. You then recorded the SFC ACC Heywood, so that is who
 4 was dealing with matters in GMP?
 5 **A. Yes.**
 6 Q. Then you have recorded:
 7 "Could have to strike in Cheshire, contain premises
 8 as a contingency."
 9 Is that Mr Lawler providing that information?
 10 **A. It is, yes.**
 11 Q. Can you recall why he was saying that GMP may have to
 12 strike in Cheshire?
 13 **A. I think the -- the suggestion in the earlier part was**
 14 **that if certain trigger points or tipping points were**
 15 **reached then they would be able to strike in Greater**
 16 **Manchester, but then towards the end of the conversation**
 17 **clearly there is a suggestion that they could have to do**
 18 **the strike in Cheshire. And that might involve the**
 19 **containment of a premises as a contingency, which would**
 20 **suggest that if the group who were going to go into**
 21 **a premises, they may have to contain that premises.**
 22 Q. You have mentioned there reference to tipping points.
 23 Do you recall, was that a particular phrase that
 24 Mr Lawler used in his first telephone discussion with
 25 you at this time?

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1 **A. I couldn't say for certain. I know it is a phrase that**
 2 **is used in tactical firearms command, so ...**
 3 Q. Then the final note that you have made by reference to
 4 the call from Mr Lawler is you have recorded nominals
 5 and the name "Totton". Do you recall whether you were
 6 given a first name, David Totton?
 7 **A. I wouldn't know, sorry.**
 8 Q. In terms of then having made that note of the discussion
 9 with Mr Lawler, what was he essentially he asking you to
 10 do or what were you going to do following on from this
 11 call?
 12 **A. Essentially, at that time, there was a suggestion that**
 13 **they were letting us know this information. And that**
 14 **was the initial subject matter of the conversation, "We**
 15 **are letting you know". From my perspective, and I think**
 16 **it is borne out in later emails, there was an early**
 17 **suggestion that that information was to be kept very**
 18 **tight --**
 19 Q. Yes.
 20 **A. -- to myself as the on duty silver commander for the**
 21 **force. And basically that was where we were at with**
 22 **that sharing of the information.**
 23 Q. Do you recall why you were being asked in particular to
 24 keep the circle of knowledge tight, essentially to you
 25 and I think Mr Gerrard?

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1 **A. Yes, I think very often it is around the tactics that**
 2 **are being used to, covert tactics, you know technical**
 3 **equipment on vehicles and I didn't ask, was the method**
 4 **by which the intelligence had been gathered then very**
 5 **often the sort of conversation between officers is just**
 6 **to keep the information tight.**
 7 Q. We can see, just staying on page 9, I think it is not
 8 referenced within the witness statement you have
 9 provided, you have a timed note for 15.05, referencing
 10 the TA's name, Phaedra McLean, who the Inquiry has heard
 11 evidence from.
 12 **A. Yes.**
 13 Q. That note appears from the evidence we have heard to
 14 reference the first time she was made aware or you have
 15 contacted her on that day?
 16 **A. Right.**
 17 Q. Can you tell us anything about the contact with
 18 Phaedra McLean at 3.05 on 1 March?
 19 **A. Sadly, I haven't got it -- my sort of recollection of**
 20 **that day was having received that call, not being sure,**
 21 **sort of, what action to take and the tactical firearm,**
 22 **the TACs, the TAC advisers are the people who have**
 23 **a broader information about firearms operation. So**
 24 **I would have been able to look into who the force TAC**
 25 **was, to identify Phaedra McLean as being the force TAC**

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1 **adviser. Contacting her, sort of giving her some**
 2 **information vaguely around a Greater Manchester**
 3 **operation that was coming over and wanting to sort of**
 4 **get some information from her around sort of advice as**
 5 **to what to do in that circumstance.**
 6 Q. Thank you. Can we just briefly turn to the TA log that
 7 Phaedra McLean completed at that time. You will find it
 8 please within bundle M5, at page 97.
 9 You can see on page 97 there is reference to being
 10 contacted by you at 3.00, which I think fits with the
 11 note we have just been through. Then the information
 12 she has recorded at that time is:
 13 "Call to Chief Inspector Bailey from GMP robbery
 14 squad stating operation to be run by GMP overnight in
 15 relation to premises, robbery Culcheth area of
 16 Warrington. MASTS team with special munitions ..."
 17 Then there is reference to "details attached", there
 18 is an email but I don't think that came till later.
 19 I think there is nothing out of the ordinary there in
 20 respect of what you tell the Inquiry.
 21 **A. No.**
 22 Q. Thank you. If you want to put that to one side again,
 23 please.
 24 We then see that the next conversation you had was
 25 I think a meeting with Phaedra McLean, where we do see

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1 your notes at 4.44 on page 9. Do you want to please
 2 just go through those notes and what is recorded and
 3 what was being discussed and the advice you were
 4 receiving from Phaedra McLean at that time, please.
 5 **A. Yes.**
 6 **So to go through the notes and it obviously talks**
 7 **about contingencies and then a list which says:**
 8 **"Our ARVs, local officer forewarning Cheshire,**
 9 **incidents at Culcheth Parade, helicopter/ASU. Night**
 10 **time TFC, sightings of vehicle -- Audi. FIM? Have they**
 11 **capacity to put on capacity pursuit contingency?"**
 12 Q. Can I ask in terms of reference to "night time TFC", why
 13 have you recorded night time TFC?
 14 **A. Because my tour of duty for that day was going to finish**
 15 **at 7.00 pm.**
 16 Q. Yes.
 17 **A. The information was very much that this was going to**
 18 **occur in the evening or early hours of the following**
 19 **day --**
 20 Q. Yes.
 21 **A. -- when I would be off duty and the next tactical**
 22 **firearms commander would come on duty.**
 23 Q. Thank you.
 24 You have then recorded underneath that:
 25 "Totton is under observation, no indication that

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1 others ..."
 2 Is that right?
 3 **A. Yes.**
 4 Q. Can you again assist us as to why you put, "No
 5 indication that others ..."?
 6 **A. I think going back to that earlier comment that perhaps**
 7 **I have not been given information about any other**
 8 **persons other than Totton.**
 9 Q. We then see a note in respect of action email details to
 10 Peter Crowcroft, and I think perhaps that comes later
 11 than the meeting at 4.44 with Phaedra McLean. So
 12 perhaps if I can go to those in a moment but just in
 13 terms of a sort of headline or summary of what the
 14 discussion or agreement was between you and
 15 Phaedra McLean in respect of whether this was to be any
 16 firearms deployment on 1 March, please.
 17 **A. Yes, having received the information from Greater**
 18 **Manchester Police, I was cognisant that I would have to**
 19 **go to my strategic firearms commander, Detective Chief**
 20 **Constable Graham Gerrard, provide him with a briefing.**
 21 **So Phaedra McLean was able to provide me with some -- we**
 22 **had a conversation with her, I had a conversation with**
 23 **her about what kind of things Mr Gerrard might want,**
 24 **what kind of information I could provide around our**
 25 **contingencies and options available to Cheshire Police.**

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1 Q. Thank you. Could I ask you then, having sought the
 2 advice and input of the TA on duty that day, can you
 3 assist as to how your thinking about cross border
 4 protocols or what the relevant issues are relating to
 5 cross-border protocols in terms of GMP's information
 6 that was shared?
 7 **A. Yes, from my perspective as the TFC it is a matter for**
 8 **the strategic firearm commanders between the two forces**
 9 **to make a decision as to whether they wish to retain**
 10 **total command or leave it in the command of the other**
 11 **force, or even swap resources. So I knew that was**
 12 **a matter that they would have to decide between**
 13 **themselves.**
 14 Q. So as at the time when you are having the discussion
 15 with Phaedra McLean, there is not a decision about
 16 whether or not there is going to be permission to allow
 17 GMP to come to Cheshire?
 18 **A. No, it is -- that is not a matter that I would have**
 19 **discussed, because it is not something that I would be**
 20 **responsible for making the decision for.**
 21 Q. Thank you.
 22 Can we move, then, to the discussion that you had
 23 with Deputy Chief Constable Graham Gerrard, who was the
 24 SFC at that time. Can you assist in terms of the timing
 25 of the meeting because there is some slight differences

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1 as to when the meeting was. I am going to take you to
 2 Mr Gerrard's notes, which seem to suggest the meeting as
 3 at 5.00 but then we also have notes from
 4 Peter Crowcroft -- who I think was the silver commander
 5 who was taking over -- to suggest that the meeting was
 6 later, at 6.00.
 7 **A. My recollection, having looked at it, is that it was**
 8 **nearer the 6.00 time.**
 9 Q. Perhaps if we use at this time the note of DCC Gerrard
 10 please which you will find in bundle M1, at page 57. If
 11 you could leave that open and perhaps assist before
 12 going into the notes as to whether or not you had
 13 considered an email that Mr Lawler had sent across
 14 before in a meeting. That is in your bundle, please,
 15 behind tab 3.
 16 It is the internal pagination 14, please. We can
 17 see at page 14 it is an email to you sent from a H9 at
 18 4.26 in the afternoon and attaching details of the
 19 operation, so it is:
 20 "Nick, for your information and that of your DCC
 21 only please. If required I will ensure any unarmed
 22 officers in Cheshire are not at risk during this
 23 operation, I will also arrange our full brief to be
 24 forwarded to you. Please speak if you have any issues."
 25 That is from H9.

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1 We see below that he has forwarded an internal email
 2 sent within GMP at 3.39 pm, detailing the threat
 3 assessment and working strategy as well as the tipping
 4 points.
 5 **A. Yes.**
 6 Q. Do you recall whether you had that information when you
 7 had the meeting with DCC Gerrard?
 8 **A. Yes, I will have done, yes.**
 9 Q. Can you assist then, in terms of the information that is
 10 contained within the threat assessment and working
 11 strategy from GMP, we can see there is reference to
 12 tipping points on page 15. We can see tipping point
 13 number one is, "One or more of the subjects are in the
 14 stolen Audi bearing false plates and moving towards
 15 Culcheth".
 16 **A. Yes.**
 17 Q. If we see a little higher up on that page, we can see
 18 the subjects are recorded as Grainger, Rimmer and
 19 Totton. Can you see, it is the --
 20 **A. Yes.**
 21 Q. -- sixth bullet point?
 22 **A. Yes.**
 23 Q. At that time when you were considering the email and the
 24 details within it, had you been provided -- other than
 25 within this email -- from anyone else the details of

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1 Grainger and Rimmer?
 2 **A. I think by that time we had received the copies of the**
 3 **operational order. I think that came just prior to that**
 4 **meeting I think.**
 5 Q. I was going to ask you about that, because we can see
 6 the email at 4.26 seems to be suggesting that the full
 7 brief was going to be forwarded to you, so it doesn't
 8 appear to have been sent at that time?
 9 **A. No, but I think there is a later -- I think if you look**
 10 **at page 19, there is an email there at 17.11.**
 11 THE CHAIRMAN: Page 19? Yes, divider 4.
 12 MS CARTWRIGHT: Yes.
 13 **A. Sorry, yes.**
 14 Q. The 5.11 to Nicolas Bailey attaching the operational
 15 order.
 16 **A. Yes.**
 17 Q. Again, is that a document you then had before the
 18 meeting with DC Gerrard started?
 19 **A. Yes.**
 20 Q. Thank you.
 21 THE CHAIRMAN: Right, so that is 17.11?
 22 MS CARTWRIGHT: Yes.
 23 THE CHAIRMAN: That is the time in the middle of the page?
 24 MS CARTWRIGHT: It is, sent from X7 to Nicolas Bailey.
 25 THE CHAIRMAN: Yes, right, okay. Thank you.

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1 MS CARTWRIGHT: It is not copied in your bundle but perhaps
 2 just to be clear about that operational order, the
 3 attachment, because I think we see that you forward it
 4 on, which is the 2 March PowerPoint, and that is in
 5 bundle F at page 447. Can you just confirm that is the
 6 document you are referring to?
 7 **A. Yes, it is.**
 8 Q. You had considered this also before the meeting with the
 9 SFC, DCC Gerrard?
 10 **A. Yes, I mean it depends what your version of "considered"**
 11 **is. I mean my role at that time, sort of 5.00/6.00 pm**
 12 **was preparing the sort of late locum and Mr Gerrard with**
 13 **the relevant information.**
 14 Q. Yes.
 15 **A. So when you say had I considered it, I had not sort of**
 16 **digested the document fully, I was preparing it and**
 17 **pulling it all together for them to go to that meeting.**
 18 Q. Yes, but in terms of the threat assessment relating to
 19 the three subjects, you had seen that and seen the
 20 images of them contained within the PowerPoint for
 21 2 March?
 22 **A. Yes.**
 23 Q. Can I ask, when we see reference to the tipping points
 24 in the email, which match the tipping points in the
 25 PowerPoint, to, "One or more of the subjects are in the

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1 stolen Audi bearing false plates and moving towards
 2 Culcheth". That is in accordance with what I think
 3 Mr Lawler had said to you at the 2.53 call?
 4 **A. Yes, it is.**
 5 Q. Again, in terms of that being one of the tipping points,
 6 and the knowledge that there was a technical, did you
 7 understand or believe that then GMP would be notifying
 8 you when they had knowledge that the subjects were in
 9 that vehicle moving towards Culcheth?
 10 **A. That was very much what I was looking to facilitate, to**
 11 **make sure that we were informed of that, yes.**
 12 THE CHAIRMAN: Is that what you were expecting? You say you
 13 were looking to facilitate it, quite what does that
 14 mean?
 15 **A. Yes, I was looking to make sure, to be clear on what the**
 16 **expectations for officers in Cheshire was when their**
 17 **operation began. So was that they were going to ring us**
 18 **as they crossed the border? Was that they were going to**
 19 **ring us when they based up in Salford? And I think it**
 20 **was in the one of the emails that I sent to DCI Lawler**
 21 **was seeking that clarification for my colleague, Chief**
 22 **Inspector Crowcroft.**
 23 MS CARTWRIGHT: We will come on to that email because I am
 24 going to take you through the emails in the order, but
 25 again in terms of your knowledge, you had a knowledge

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1 that GMP had the technical ability to tell you the
 2 moment that vehicle moved because of the technical
 3 equipment attached to it.
 4 **A. Yes.**
 5 Q. If we can then please look at DCC Gerrard's note,
 6 because I don't think you have your own notes of that
 7 meeting. We see on page 57:
 8 "Returned to headquarters, a meeting with
 9 Nick Bailey and Pete Crowcroft."
 10 Who was going to be who you handed over to as the
 11 next silver commander?
 12 **A. Yes.**
 13 Q. "... GMP MASTS, intel that may come on to Cheshire,
 14 Culcheth Parade of shops, early hours, previous MO is to
 15 break into premises overnight and await staff in the
 16 morning."
 17 Again, would that be information that you would be
 18 providing to him as Mr Lawler provided to you at 2.53?
 19 **A. Yes.**
 20 Q. "Suspects armed."
 21 Again, would that be information that you would be
 22 providing?
 23 **A. Yes.**
 24 Q. Just for clarity, where did you take the information
 25 that the subjects would be armed?

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1 **A. It would have been from DCI Lawler.**
 2 Q. We can see then reference to, "Had been surveilled to
 3 Culcheth previous day".
 4 **A. Hmm.**
 5 Q. "Intention is to arrest on GMP, once they get to car but
 6 if they cannot they will follow and arrest ..."
 7 I can't read the next:
 8 "... when safe [I think] etc. Notification to us
 9 via their silver of job coming on to us."
 10 Again, is that you feeding that information to
 11 DC Gerrard?
 12 **A. Yes.**
 13 Q. Again, it was your understanding that GMP were going to
 14 be telling you when they were on the move, but
 15 essentially GMP were intending to arrest them if that
 16 tipping point was met within GMP?
 17 **A. Yes, I think also, I think from my notes from**
 18 **DCI Lawler, I think the last comment was, if a tipping**
 19 **point is met, then they were going to perhaps have**
 20 **contingency for them being in Cheshire.**
 21 Q. Yes.
 22 **A. So clearly there was some degree of flexibility in their**
 23 **plans I suspect, because that for me to make those notes**
 24 **earlier.**
 25 Q. Yes, but again appreciating that there are then other

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1 contingencies put in place, we can see DCC's Gerrard has
 2 recorded, "Intention to arrest on GMP once they get to
 3 car, but if they cannot they will follow and arrest when
 4 safe".
 5 **A. Yes.**
 6 MS CARTWRIGHT: Page 58, sir.
 7 THE CHAIRMAN: I am looking at page 58, I have just lost --
 8 there we are, yes.
 9 MS CARTWRIGHT: We can then see the note seems to read and
 10 I appreciate this is my interpretation of DCC Gerrard's:
 11 "Discussed with superintendent and Chief Inspector
 12 Crowcroft, night locum, situation imprecise re our
 13 knowledge, agreed to let GMP do the surveillance
 14 et cetera, need to let us know when come on to Cheshire,
 15 et cetera."
 16 **A. Yes.**
 17 Q. Can you tell us more about what DC Gerrard was saying at
 18 that time?
 19 **A. The conversation was very much -- I do recall at that**
 20 **time we, Cheshire, did have the capability to do MASTS**
 21 **but I don't think we ever had the capacity to do MASTS,**
 22 **I think is my recollection at that time. So for such**
 23 **an operation to come into Cheshire, it would have been**
 24 **very difficult for Cheshire to take the tactic, using**
 25 **our resources. And, likewise, based on our imprecise**

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1 **knowledge of the intelligence, it would have been**
 2 **difficult for us to command the operation because we**
 3 **didn't have all the intelligence information.**
 4 Q. Yes.
 5 **A. So, on both levels, it was more sensible to allow**
 6 **Greater Manchester Police to come into Cheshire and**
 7 **command and use their officers as the tactic.**
 8 Q. Yes.
 9 But again, in terms of the note that DCC Gerrard has
 10 made, was he essentially clearly setting out at that
 11 time that GMP needed to let Cheshire know when GMP came
 12 into Cheshire?
 13 **A. I think from my later email, I think it is as soon as it**
 14 **is practicable. And I think that is in accordance with**
 15 **the manual of guidance.**
 16 Q. Thank you.
 17 Again the note reads on:
 18 "Need to determine if they want any support from us,
 19 command and control by them, we will only consider the
 20 control of job ..."
 21 **A. "Taking control", I suspect it would be "taking**
 22 **control".**
 23 Q. Sorry:
 24 "... taking control if job becomes static in
 25 Cheshire and we have time to put staff into position.

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1 Not had direct contact by then, their ACPO but not
 2 necessary as ..."
 3 Is it, "... log as above is discussed with the
 4 silver, with their silver?"
 5 **A. Yes, looks like it.**
 6 Q. Then can you assist then in terms of the outcome of that
 7 meeting between the two silver commanders, you handing
 8 over to Crowcroft with the SFC. Was it essentially that
 9 GMP would be permitted to come on to Cheshire but they
 10 would maintain the command and control of the operation,
 11 save for if the suspects went into a building?
 12 **A. Yes.**
 13 Q. Could I ask you then to look at some follow up emails
 14 that appear to be sent following on from the discussion
 15 with DCC Gerrard. Behind tab 4, please, page 19, we
 16 have already looked at this a moment ago, I think you
 17 directed it, we can see at 18.17 you forwarded the
 18 operational order to Peter Crowcroft.
 19 **A. Yes.**
 20 Q. Would that have been during the meeting, before the
 21 meeting or after the meeting?
 22 **A. I suspect it is after the meeting.**
 23 Q. Is that to ensure that he had the same information that
 24 you have been provided with from GMP?
 25 **A. Yes.**

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1 Q. Thank you.
 2 Then we see your email to Mr Lawler at tab 3,
 3 please, and it is the internal pagination, page 13.
 4 We see an email from you to Mr Lawler and
 5 Peter Crowcroft, but we can see the email text then
 6 says, sets out:
 7 "Mike, further to our conversation, the Cheshire TFC
 8 will be chief inspector Peter Crowcroft. He has asked
 9 if possible you can call him just to confirm
 10 communication."
 11 Just pausing there, had there been another telephone
 12 discussion with Mr Lawler before this email was sent or
 13 are you referencing the 2.53?
 14 **A. I can't be sure. There may well have been because**
 15 **I think there was some conversation, maybe even if it**
 16 **was just to let him know that outside of his request to**
 17 **share with DC Gerrard, obviously I would go and have**
 18 **a conversation with Phaedra and the night locum. So**
 19 **there may well have been --**
 20 Q. There may well have been another one, but a brief one
 21 updating him as to what was taking place?
 22 **A. Yes.**
 23 Q. Then you go on to provide the details of the Cheshire
 24 force incident manager, I think the number for that.
 25 Essentially is what is set out a summary of your

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1 contemporaneous notes relating to the meeting with
 2 DCC Gerrard and Crowcroft?
 3 **A. Yes, more a case of some points that we were clear to**
 4 **be -- that we wanted to be clear on from a Cheshire**
 5 **perspective, yes.**
 6 Q. Yes. Perhaps if we just go through those, please, so
 7 starting with the context to the bullet points:
 8 "I briefed DCC Gerrard regarding this incident. The
 9 below represents some of the contingency matters we
 10 discussed.
 11 "1, the information relates to Op Shire as
 12 forwarded."
 13 Again this is you perhaps audit trailing the
 14 information?
 15 **A. Yes.**
 16 Q. The second bullet point:
 17 "In the event that Totton or the Audi moved prior to
 18 Op Shire then there is a contingency in place for a GMP
 19 ARV in Leigh to intercept."
 20 Again, is that just formally recording what you
 21 understood to be the position from the information
 22 Mr Lawler had provided?
 23 **A. Yes.**
 24 Q. The third bullet point:
 25 "In the event the tipping points are met in the GMP

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1 area, the intention is to intercept prior to criminal
 2 activity at Culcheth Parade area."
 3 **A. Yes.**
 4 Q. Fourth bullet point:
 5 "There is no information or intelligence that
 6 warrants Cheshire Police to take any mitigating action
 7 prior to further updates from Op Shire TFC in relation
 8 to the deployment of unarmed or armed protocol in the
 9 Culcheth area of Warrington."
 10 **A. Yes.**
 11 Q. Then the fifth bullet point:
 12 "In the event that Op Shire enters Cheshire, at
 13 an appropriate time you will inform the force incident
 14 manager and TFC, CI Peter Crowcroft."
 15 Can you assist, in terms of referencing "appropriate
 16 time"?
 17 **A. I guess I would -- it would be subject to what is going**
 18 **on actually for the officers there and then. You know,**
 19 **I wouldn't know the dynamics of who is driving cars, who**
 20 **is able to do what and the speed at which they would be**
 21 **travelling. So I would just expect as soon as**
 22 **practicable.**
 23 Q. Yes.
 24 Then the sixth bullet point:
 25 "In the event that a containment situation arises in

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1 Cheshire, the Cheshire TFC is to be informed to assess
 2 feasibility of deploying as a spontaneous incident
 3 Cheshire ARV patrols."
 4 **A. Yes.**
 5 Q. Final bullet point, a request that in the event that
 6 an interception is made, that the oncoming silver
 7 commander, Mr Crowcroft, would be informed at
 8 a convenient time.
 9 **A. Yes.**
 10 Q. Do you recall, did you receive any response from
 11 Mr Lawler to this email?
 12 **A. Not that I am aware of, but the sort of instruction at**
 13 **the top was obviously for Chief Inspector Crowcroft to**
 14 **have that conversation with him.**
 15 Q. You have also copied in H9, who I think had forwarded
 16 you one of the documents we looked at earlier in the
 17 emails.
 18 **A. Yes.**
 19 Q. Can I ask you to look, please, in bundle K.
 20 **A. What page was it?**
 21 Q. It is page 1049, please.
 22 **A. Yes.**
 23 Q. We can see at page 1049 it is the VTD download from the
 24 technical equipment that was attached to the stolen
 25 Audi.

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1 **A. Hmm.**
 2 Q. We can see round about the time when these emails are
 3 being sent, it appears -- it is that the red stolen Audi
 4 was in fact making its way to Culcheth. Perhaps if we
 5 see essentially on the right-hand side, the miles per
 6 hour column, we can see that at 18.05 the Audi begins to
 7 move, but significantly, if we look down at the 18.55
 8 entry, we can see that the Audi is on Common Lane, and
 9 at 18.56 it is on Jackson Avenue and we see it again on
 10 Common Lane at 19.01 in Culcheth.
 11 **A. Hmm.**
 12 Q. Can I ask: at any point before you handed over and went
 13 off duty at 7.00 did GMP provide any information to you
 14 relating to the Audi being on the move or being in the
 15 Culcheth Parade area?
 16 **A. No. Not to me.**
 17 MS CARTWRIGHT: Just excuse me for one moment.
 18 Thank you. Just wait there, those are my questions.
 19 **A. Thank you.**
 20 **Questions from MR WEATHERBY**
 21 **MR WEATHERBY: May I just very quickly, I don't think I am**
 22 **going to need to refer to any documents. Just to round**
 23 **up your evidence. You hear just before 3.00 from**
 24 **Manchester, they are telling you that they understand**
 25 **that a serious offence may happen in your area --**

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1 **A. Hmm.**
 2 Q. -- the following middle of the night?
 3 **A. Yes.**
 4 Q. You are told that it involves a particular car, with
 5 a tracker. Your understanding of that would be that
 6 they are telling you that they have, in police speak,
 7 control of that car. Is that right?
 8 **A. I think --**
 9 Q. They are telling you that they know where it is?
 10 **A. Yes.**
 11 Q. And they know when it moves?
 12 **A. I think there is a reference in one of the lines, yes,**
 13 **to say if it moved before the operation --**
 14 Q. Yes, well I am coming to that in a moment.
 15 They then tell you that their plan -- they send you
 16 the plan -- is that they are going to strike in Salford,
 17 in Manchester, yes? If possible.
 18 By 6.35, the email you have just been shown, they
 19 are telling you that, if their operation isn't up and
 20 running but the car moves, don't worry about it, we have
 21 a contingency.
 22 **A. That email is from me to them.**
 23 Q. Sorry, your email but you are getting confirmation from
 24 Mr Lawler of what he has told you, yes?
 25 **A. Yes.**

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1 Q. My mistake.
 2 You are confirming that the plan primarily is for
 3 there to be a strike in Salford, if feasible. If the
 4 operation is not up and running, don't worry about it,
 5 firstly we have control of the car, we know it is moving
 6 and, secondly, we have a first contingency in Greater
 7 Manchester, yes? They are telling you they have got
 8 an ARV.
 9 **A. Hmm.**
 10 Q. The purpose of telling you is if for one reason or
 11 another none of that happens, there is a possibility it
 12 comes on to you but don't worry about it, we will tell
 13 you if that happens?
 14 **A. Yes.**
 15 **MR WEATHERBY: Thank you very much.**
 16 MS CARTWRIGHT: No further questions.
 17 THE CHAIRMAN: Thank you, Mr Bailey. That is the end of
 18 your evidence. Thank you for helping the Inquiry.
 19 MS CARTWRIGHT: Sir, I envisage the next witness will be
 20 a similar sort of time to Mr Bailey, it is whether you
 21 want to take a short five-minute break before we
 22 commence.
 23 THE CHAIRMAN: We started at 1.50, yes, we will take
 24 a five-minute break now I think. Until 2.50.
 25 (2.42 pm)

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1 (A short adjournment)
 2 (2.50 pm)
 3 MS CARTWRIGHT: Peter Crowcroft, please. Thank you.
 4 MR PETER CROWCROFT (sworn)
 5 THE CHAIRMAN: Thank you, Mr Crowcroft. If you would like
 6 to sit down you are very welcome to do so.
 7 **A. I am fine standing, sir, thank you.**
 8 **Questions from MS CARTWRIGHT**
 9 MS CARTWRIGHT: Good afternoon, Mr Crowcroft. My name is
 10 Sophie Cartwright and I ask questions on behalf of the
 11 Inquiry.
 12 Can I ask you to turn in the bundle to where we see
 13 your witness statement dated 30 July 2012. Have you had
 14 an opportunity before today to consider that statement?
 15 **A. I have, yes.**
 16 Q. Can I ask you to confirm: are the contents true to the
 17 best of your knowledge and belief?
 18 **A. They are.**
 19 Q. You tell us in March 2012 that you were a chief
 20 inspector with Cheshire Constabulary, do you remain
 21 a chief inspector?
 22 **A. No, I am a superintendent at the moment.**
 23 Q. Can you assist as of March 2012 how long you had been
 24 a chief inspector for, please?
 25 **A. I think at that time, I had been a chief inspector for**

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1 **about seven years.**
 2 Q. Can you assist as to your total service with Cheshire
 3 Police, please?
 4 **A. As of now?**
 5 Q. As of then.
 6 **A. As of then, I would have had 17 years.**
 7 Q. Thank you.
 8 We know that on 1 March 2012 you were performing the
 9 duties in the evening of a silver commander a TFC, how
 10 long at that time had you been a TFC?
 11 **A. As a TFC I believe it was about a year and a half.**
 12 Q. Thank you.
 13 We can see that you were down to provide the locum
 14 cover from 7.00 pm to 7.00 am from 1 March into the
 15 morning of 2 March 2012.
 16 **A. That's correct.**
 17 Q. You tell us that at about 5.00 on 1 March in the
 18 evening, you spoke to the at that time silver commander
 19 Mr Bailey. I think you have made notes in respect of
 20 that conversation, so could I take you to those, please,
 21 we find them behind tab 2.
 22 Your statement tells us, if you find those --
 23 **A. Yes.**
 24 Q. -- that he had received some information from Greater
 25 Manchester Police in respect of looking at running

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1 an operation concerning a crime being planned in the
 2 Culcheth area of Cheshire.
 3 **A. That's correct.**
 4 Q. Can we just work through the notes that you made at that
 5 time, please.
 6 Is it "B-R-F" for, "Brief Nick Bailey"?
 7 **A. Yes, "Brief Nick Bailey".**
 8 Q. Thank you. Then you have recorded:
 9 "GMP TFC approximately 1500 hours."
 10 Is that to reflect the time when Mr Bailey had
 11 received the information from his counterpart in
 12 Manchester?
 13 **A. That is as I understand it, yes, because I didn't**
 14 **actually come in until about 5.00.**
 15 Q. Thank you.
 16 Can you then read through the next notes that you
 17 have made, please, at that time.
 18 **A. The next line reads:**
 19 **"MASTS Op [which I understand to be mobile armed**
 20 **surveillance to -- sorry, mobile armed support to**
 21 **surveillance] Op on the go."**
 22 Q. Yes.
 23 **A. "Surv [which would be 'surveillance'] info, 29/2 on to**
 24 **Cheshire, size up parade shops at Culcheth."**
 25 Q. Thank you. Just pausing there, in terms of surveilled

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1 into Culcheth on 29 February, were you aware at that
 2 time that GMP had a technical device fitted to the
 3 vehicle that they were surveilling?
 4 **A. Not at that time of this briefing, while we went through**
 5 **the briefing we can see there that I was told that there**
 6 **was technical support on a vehicle but not prior to**
 7 **that.**
 8 Q. No, thank you.
 9 We can then see I think you have recorded:
 10 "Armed [reference to guns] MO break in overnight
 11 then wait."
 12 **A. Yes.**
 13 Q. Is that information Mr Bailey has provided to you?
 14 **A. This is -- all the information on this exhibit is from**
 15 **the brief from Nick Bailey.**
 16 Q. Can you recall anything further about what he said at
 17 that time relating to the MO for the group?
 18 **A. It is five years ago I am afraid, so I can't recall**
 19 **anything in addition.**
 20 Q. You have then recorded four premises, Thomas Cook
 21 Sainsbury's, NatWest and Cheshire Building Society as to
 22 premises Bailey informed you that I think GMP had told
 23 you that the group were interested in?
 24 **A. That is -- I couldn't say for sure, but what I am**
 25 **thinking is the parade shops at Culcheth, and that would**

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1 **have been an array of shops that were at that parade at**
 2 **Culcheth.**
 3 Q. Thank you. The next entry we see I think is
 4 confirmation that you were told at that time that there
 5 was a technical on the stolen Audi?
 6 **A. Yes. Yes.**
 7 Q. Your note is:
 8 "Using stolen Audi [with the registration number],
 9 technical on vehicle ..."
 10 Is it "trader" -- or "tracker", sorry.
 11 **A. I think that is "tracker", yes.**
 12 Q. Thank you.
 13 We then see the reference to, "Late tonight and
 14 tomorrow morning". What does that relate to, is that
 15 the information as to when GMP thought --
 16 **A. I believe that was when they were going to run the**
 17 **operation. I can't say whether that was -- whether that**
 18 **relates to when the actual incident was foreseen to be**
 19 **happening. I believe that was when they were running**
 20 **the operation.**
 21 Q. Can I ask, in terms of being told by Mr Bailey that GMP
 22 had a tracker device on the Audi, was it your
 23 understanding that GMP would notify Cheshire when there
 24 was movements by that stolen vehicle?
 25 **A. I -- that was my understanding, that we were -- we would**

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1 **be kept informed about how the operation was going. But**
 2 **particularly, because it was cross border, about when it**
 3 **came into the Cheshire area.**
 4 Q. Yes.
 5 In terms of, it may seem a silly question but why
 6 particularly to be notified when they came into the
 7 Cheshire area?
 8 **A. Because, although there had been a gold-to-gold**
 9 **conversation, so strategic firearm to strategic firearm,**
 10 **these operations are sometimes unpredictable and because**
 11 **it was coming into Cheshire, I had responsibility for**
 12 **the force, so my job as locum is to look at the**
 13 **reputation of the organisation as well as safeguarding**
 14 **communities. So whilst I didn't anticipate to have any**
 15 **role within the operation, there might well be things**
 16 **that come out of the operation that I would have to deal**
 17 **with because it impacts Cheshire.**
 18 Q. Yes.
 19 Again it was your understanding that if this group
 20 came into Cheshire, you should be notified, even if it
 21 was not requiring you to do anything but just so you
 22 could have in place or make contingencies if necessary?
 23 **A. Yes.**
 24 Q. We can then see reference to:
 25 "Will strike if feasible Salford."

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1 **A. What I recall from this is that it was always a Greater**
 2 **Manchester Police operation, but because of the**
 3 **geography and the anticipated targeted premises that**
 4 **they might move into the Cheshire area, so there is**
 5 **always a degree, within the operations, that you know,**
 6 **there was a number of tipping points that has been**
 7 **described.**
 8 Q. Yes.
 9 **A. So if it is feasible, we would look to take the action**
 10 **sooner rather than later. So that is as I understand**
 11 **that to be.**
 12 Q. Thank you. We can then see reference to ANPR and
 13 briefing. Can you assist us at all as to what they
 14 relate to?
 15 **A. I can't recall it exactly, but what I can think from my**
 16 **experience is that we had or rather Greater Manchester,**
 17 **the operation, had a registration number. ANPR is**
 18 **widely covered -- or covers widely across the**
 19 **north-west, so ANPR was one of the facilities that would**
 20 **allow us to see where a particular vehicle is.**
 21 **"Briefing", I am afraid, I can't really say exactly**
 22 **what that related to.**
 23 Q. Thank you.
 24 Again, in terms of the vehicle moving and knowing
 25 where it is, the tracker would enable GMP to know where

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1 the vehicle was, the tracker device?
 2 **A. The tracker would --**
 3 Q. Yes.
 4 **A. -- but obviously it is not -- you know, any device is**
 5 **not 100 per cent reliable, but yes.**
 6 Q. There is then, it seems like a hanging sentence:
 7 "Risk that vehicle moves without."
 8 Can you assist at all as to what that related to?
 9 **A. I can't I am afraid, with the passage of time.**
 10 Q. If we move then to the next sentence:
 11 "Contingency: no indication ..."
 12 Is it that, "... until car or Totton move then job
 13 takes place"?
 14 **A. Once again, because of the passage of time, I am afraid**
 15 **I can't reliably say what that refers to.**
 16 Q. No, okay.
 17 Then you put:
 18 "Ie any info of job respond as normal."
 19 **A. My interpretation of that would be linked to the sort of**
 20 **tipping points that we were going to treat any new**
 21 **information as a spontaneous firearms incident, and that**
 22 **is how we would deal with anything that is not**
 23 **pre-planned and that is what I believe is what I mean by**
 24 **"normal".**
 25 Q. Following on from this briefing from the silver

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1 commander who you were going to be taking the handover
 2 from at 7.00 -- taking over, I should say, as silver
 3 commander. The intention was that both you and he would
 4 attend on DCC Gerrard, the SFC, to discuss the
 5 information you had at that time?
 6 **A. That's correct.**
 7 Q. I think you have also made notes in respect that further
 8 briefing and we find those behind tab 4.
 9 **A. Yes, that's correct.**
 10 Q. You have timed the meeting as 1800 hours, can you assist
 11 as to how accurate that would be?
 12 **A. 1800, that would be me looking at my watch and saying**
 13 **that was the time.**
 14 Q. Yes, thank you.
 15 You have recalled I think does it say, "Briefing
 16 with DCC re"?
 17 **A. "... re surveillance job."**
 18 Q. You have recorded:
 19 "If car moves 1800 hours to 1.00 in the morning then
 20 armed response vehicle at Leigh will strike."
 21 **A. As I understand that to be, because the intention was to**
 22 **strike prior to the vehicle coming to Cheshire, that**
 23 **between those hours, then the ARV at Leigh in Manchester**
 24 **would make the strike.**
 25 Q. I think does that fit with the information you had from

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1 GMP, where it is understood that the operation would
 2 take place later that evening or in the early hours?
 3 **A. That is as I understand it, that was the briefing, yes.**
 4 Q. Then you have recorded, is it "follow in MASTS" or just
 5 "follow MASTS"?
 6 **A. I believe that that is referring to the tactic of the**
 7 **mobile armed support to surveillance, so follow in**
 8 **MASTS.**
 9 Q. Thank you. Then there is a reference, is it:
 10 "No info or intel that other job will happen."
 11 Can you assist at all as to what that relates to?
 12 **A. I believe that at the time this related to the fact that**
 13 **there was nothing, as that suggests, no information or**
 14 **intelligence that any other incident, job, any**
 15 **criminality was to follow in that area, except for**
 16 **perhaps the one -- the operation we were discussing.**
 17 Q. Then, "Will ring force control room". What does that
 18 relate to, please?
 19 **A. I believe that was because there had been a formal**
 20 **discussion gold to gold, that the operation was being**
 21 **run by Greater Manchester, would inform the control room**
 22 **if it came on to Cheshire, that was one of the points,**
 23 **as I would understand that. But I would say it was five**
 24 **years ago, so I am --**
 25 Q. Of course. Yes.

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1 Then reference to I think the contingency:
 2 "If in premises then we consider taking over."
 3 **A. This was the spontaneous nature, so there was nothing**
 4 **that I saw in the briefing that it was pre-planned to**
 5 **come into Cheshire and it was agreed at gold that**
 6 **Greater Manchester would run with the operation through**
 7 **into Cheshire, so we would deal with any information we**
 8 **had as we do, at all times, on what we call**
 9 **a spontaneous.**
 10 **And then using the national decision model we would**
 11 **look to decide on the tactics, the powers, the plan and**
 12 **the risk, based on what we had at the time.**
 13 Q. Thank you.
 14 Again, in terms of your understanding at that
 15 meeting at 6.00, was that there would be information
 16 provided to Cheshire, control room to control room, if
 17 the subjects came on to Cheshire?
 18 **A. That is as I understood. There is always, I think it is**
 19 **in the emails later, there was always the understanding**
 20 **that Cheshire would be notified from Greater Manchester**
 21 **when they came on to our area.**
 22 Q. Thank you.
 23 Then just the final two entries for your note from
 24 the 6.00 meeting, is that, "Brief the force incident
 25 manager and brief the bronze commander"?

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1 **A. And brief, yes.**
 2 Q. You were going to do that?
 3 **A. I believe that that will be myself that was going to do**
 4 **that, yes.**
 5 Q. Yes, thank you.
 6 Your statement tells us that what was discussed at
 7 the meeting were then covered in an email that Mr Bailey
 8 sends at 6.36 pm. Could I take to you that, please,
 9 which is the email behind tab 3 in your bundle.
 10 **A. Yes.**
 11 Q. Can I just go through each of the bullet points, just to
 12 confirm, because it is not your email, you are one of
 13 the recipients, so both you and Mr Lawler are the
 14 recipients of this email, to which the SFC,
 15 Graham Gerrard, is CCed in, as well as H9 and GMP
 16 officer.
 17 Can I just go through each of those bullet points
 18 and just confirm that they fit with your understanding
 19 about what had been agreed and what the agreement was
 20 Cheshire-GMP.
 21 If we go through, please, the bullet points in
 22 respect of the briefing with DCC Gerrard at which you
 23 had been present. The first bullet point, the
 24 information relates to Op Shire as forwarded?
 25 **A. Yes.**

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1 Q. Secondly:
 2 "In the event that Totton or the Audi moved prior to
 3 Op Shire, then there is a contingency in place for a GMP
 4 armed response vehicle in Leigh to intercept."
 5 Pausing there, was that your understanding from the
 6 information that had been provided from GMP that if
 7 Totton or the Audi moves it would be intercepted in the
 8 Leigh area?
 9 **A. From what I recall, yes. An Op Shire was the one that**
 10 **started that evening.**
 11 Q. Yes.
 12 The third bullet point:
 13 "In the event the tipping points are met in the GMP
 14 area, the intention is to intercept prior to criminal
 15 activity at Culcheth Parade area."
 16 Again reference to GMP, does this fit with what you
 17 told us earlier that it was your understanding that the
 18 plan was to intercept within GMP before moving, coming
 19 on to Cheshire?
 20 **A. That was the plan as I understand it, yes.**
 21 Q. Then again, part of these bullet points would it be fair
 22 to say, are they almost like an audit trail, so
 23 recording the understanding between the two forces?
 24 **A. That is exactly what it is --**
 25 Q. Yes.

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1 **A. -- because you have the discussions, you make notes and**
 2 **then the email is often used as a follow up to say, just**
 3 **confirm that we have agreed these points.**
 4 Q. Thank you.
 5 If we look then at bullet point 4, and again this
 6 would be wanted to be in writing by way of audit trail:
 7 "There is no information or intelligence that
 8 warrants Cheshire Police to take any mitigating action
 9 prior to further updates from Op Shire TFC in relation
 10 to the deployment of unarmed or armed patrol in the
 11 Culcheth area of Warrington."
 12 **A. Yes.**
 13 Q. Yes?
 14 Again, in terms of your saying we are putting this
 15 plan in place on the basis of what you have told us so
 16 far, if anything changes you need to update us because
 17 it may impact upon contingencies you put in place for
 18 your officers on the ground, both armed and unarmed?
 19 **A. Yes, and at the moment as you can see through there it**
 20 **says no information or intelligence that warrants**
 21 **Cheshire Police. So at that point we didn't believe**
 22 **there was any need for us to make those sort of**
 23 **contingency plans.**
 24 Q. Again, perhaps also a reminder to GMP that if they did
 25 have any intelligence of that nature they should be

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1 sharing it with you to enable you as a force to risk
 2 assess?
 3 **A. Well, because there was always that, you know, we have**
 4 **the plans for when they are coming to Cheshire, we had**
 5 **the responsibility that the more information that you**
 6 **have is vital to the success of that operation.**
 7 Q. Yes, thank you.
 8 Then, please, the next bullet point:
 9 "In the event that Op Shire enters Cheshire, at
 10 an appropriate time you will inform the force incident
 11 manager and TFC chief inspector Peter Crowcroft."
 12 **A. That relates to I think what I have made on my notes**
 13 **about the agreement being that they would notify the**
 14 **FIM, the force incident manager, the force control room,**
 15 **was from my previous, and give myself a ring.**
 16 Q. Then in terms of the contingency that you have told us
 17 about in respect of when Cheshire may be required to
 18 have a role, do we see that covered by the next bullet
 19 point:
 20 "In the event that a containment situation arises in
 21 Cheshire, the Cheshire TFC is to be informed to assess
 22 feasibility of deploying as a spontaneous incident
 23 Cheshire ARV patrols."
 24 **A. That was a spontaneous nature, but also the agreement**
 25 **that they would notify us and then you would have**

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1 **a discussion to decide who was in the best place to take**
 2 **command.**
 3 Q. Then the final bullet point was a request that if
 4 an interception was made, you would be informed at
 5 a convenient time. That would even be, would it -- if
 6 that had taken place in GMP, you equally would want to
 7 know as the on call silver commander?
 8 **A. You would, otherwise you are anticipating something that**
 9 **might or might not happen.**
 10 Q. Thank you.
 11 You tell us in your witness statement, and it is
 12 a time after this email was sent at 6.36, that you later
 13 on that evening had a call from Mr Lawler of GMP, who
 14 introduced himself as the tactical commander for
 15 Op Shire.
 16 **A. Yes.**
 17 Q. Can you assist us at all as to the approximate timing of
 18 that call?
 19 **A. I am afraid actually I can't because of the time and**
 20 **I think that is why it would have been left out of the**
 21 **statement, because I couldn't put an accurate time on**
 22 **it.**
 23 Q. Yes.
 24 **A. It obviously would have been at some point after the**
 25 **email, I am pretty sure of that, but I couldn't give you**

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1 **a time, I am afraid.**
 2 Q. You are pretty sure the discussion you had with
 3 Mr Lawler is after this email timed at 6.36 pm?
 4 **A. Yes, I am pretty sure of that.**
 5 Q. In terms of any contact with Mr Lawler, had you ever
 6 previously in your time as a Cheshire officer had any
 7 dealings with Mr Lawler? Was he a colleague in
 8 a different force that you had any knowledge of?
 9 **A. No.**
 10 Q. This would have been the first time you spoke to him?
 11 **A. It was, yes.**
 12 Q. You tell us in the witness statement that at that time,
 13 in line with the briefing at 6.00 that day, there was no
 14 information available to you that Operation Shire
 15 would -- sorry -- it says:
 16 "There was no information available to me that
 17 Operation Shire would impact on Cheshire Police officers
 18 or communities and Chief Inspector Lawler informed me
 19 that the intention was to run Operation Shire during the
 20 evening and he would advise me as to a result as and
 21 when activity occurred."
 22 **A. So the first part of that was around confirming once**
 23 **again that there was nothing to say that it would impact**
 24 **on Cheshire Police officers or communities, in line with**
 25 **the email before.**

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1 **And then the second point on the sentence was that**
 2 **he would advise me again. So once again that was about**
 3 **the flow of information, about the flow of an update as**
 4 **to when or if anything happened.**
 5 Q. Again, in terms of the movement of the vehicle, and if
 6 the movement of the vehicle was towards Culcheth, was
 7 that something that you would have expected to be
 8 updated on?
 9 **A. It was -- it was definitely if they came into the**
 10 **Culcheth -- into the Cheshire area and you could -- my**
 11 **interpretation would be that you could reasonably see**
 12 **you were going into the Cheshire area, I would have**
 13 **expected a call to say that is what was happening.**
 14 **Did we say, "as soon as you pass a sign that says**
 15 **Cheshire"? No, it wasn't that specific.**
 16 Q. No, of course.
 17 Can I ask you, you then say in that telephone
 18 discussion you requested a copy of the operational
 19 order, and we can see that that was received because you
 20 then forward it on in an email we will come to look at
 21 in a moment.
 22 Could I ask, prior to then your involvement in the
 23 early hours of 2 March, did you have any update from GMP
 24 or from Mr Lawler as to any activity of the OCG group
 25 that they were interested in.

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1 **A. Not prior to 0600.**
 2 Q. Could I ask you, please to look into a bundle K,
 3 page 1049. I think a pink tab has been placed on the
 4 page.
 5 **A. Okay.**
 6 Q. This is the VTD download of the tracker device that was
 7 on the stolen Audi. We can see, looking at the miles
 8 per hour, that the stolen Audi commenced movements on
 9 the timings around 6.05 on 1 March. I am not going to
 10 go through each of the locations but if we follow that
 11 down, we can see at 18.55 the stolen Audi was on
 12 Common Lane in Culcheth, 18.56 on Jackson Avenue and
 13 then again on Common Lane, moving down, at 19.01 hours.
 14 Then if we follow that through and over the page, we can
 15 see essentially the journey back to the lay up point on
 16 Sandringham Road, crossing the East Lancashire Road just
 17 after 7.00 pm.
 18 So it was laid back up at Sandringham Road certainly
 19 around about the 9.00 period, looking at the miles per
 20 hour column on the right-hand side.
 21 In terms then of the Audi travelling to Culcheth in
 22 the evening of 1 March, at any point on 1 March were you
 23 provided with information that the vehicle had travelled
 24 to Culcheth?
 25 **A. Not to my recollection.**

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1 Q. We are going to come to the further call you had with
 2 Mr Lawler at 6.00 in the morning on 2 March. At any
 3 point in the discussion at 6.00 on 2 March did Mr Lawler
 4 mention to you that the stolen Audi had been to Culcheth
 5 that night?
 6 **A. Once again, not that I can recall, no.**
 7 Q. Can we then just deal with emails that you sent prior to
 8 that discussion around 6.00 in the morning on 2 March?
 9 We can see that you send emails, I think perhaps
 10 preparing to provide the handover to your colleagues
 11 that were coming on duty. If we look, please, behind
 12 tab 6, we can see an email that you sent at 4.59 in the
 13 morning to Mr Brierley and John Betts, so perhaps if we
 14 just go through that email:
 15 "Chris, as from 1.00 am this morning GMP are running
 16 an operation where the target premises is on us, the
 17 idea being that GMP would conduct the strike phase while
 18 the vehicle and suspects are in the GMP area."
 19 Pausing there, again does this email
 20 contemporaneously confirm your understanding at that
 21 time that GMP would strike within the GMP area?
 22 **A. As it says there, "The idea being".**
 23 Q. Yes, and then we come on to the best laid plans bit of
 24 your email:
 25 "... best laid plans and all that. If the operation

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<p>1 runs on to us, GMP will have command up to the point 2 where, if subjects are contained in a building on 3 Cheshire, at this point we will take command and you 4 will need to contact DCC Gerrard who is aware. The 5 details of the operation are attached." 6 That is the Op Shire PowerPoint for 2 March 2012? 7 A. That's correct. 8 Q. Again, in terms of that briefing, and where it deals 9 with each of the nominals, namely Totton, Grainger and 10 Rimmer, had you considered that document during the 11 course of the evening of 1 March? 12 A. I think "considered" is probably a little bit strong. 13 I had it, I would have looked through it. But because 14 of -- we were looking at spontaneous incident if 15 Cheshire was to take it over, "considered" I think is 16 probably a bit of a strong word for it. I would have 17 viewed it -- 18 Q. Yes. 19 A. -- but I wouldn't have analysed it, for example. 20 Q. In terms of whilst you have no note of the call with 21 Mr Lawler on the night of 1 March, would it be fair to 22 say that we can infer or draw an inference that the 23 information that you have recorded here about, "As from 24 1.00 am this morning, GMP are running the operation", 25 but the further details are likely to be information</p> <p style="text-align: center;">Page 125</p>	<p>1 CCing John B." 2 A. This was about really passing any information I had down 3 the chain. 4 Q. Yes. 5 A. So as I took over from Superintendent Bailey, Chief 6 Inspector Brierley took over from me. So it was around 7 passing whatever information we had. 8 Q. Can I ask, when you reference, "However, GMP have told 9 us that target premises in the above attachment have 10 cash deliveries expected around 11.00 am". Did you 11 speak to anyone else in GMP apart from Mr Lawler during 12 the court of 1 March into the early hours of the 2nd? 13 A. I don't think that I did. So I would believe that 14 anything that, when I refer to GMP, was from Mr Lawler. 15 Q. Thank you. 16 Your statement then tells us that the next contact 17 is around about 6.00 in the morning, when you received 18 a call from Mr Lawler stating that the operation had 19 been stood down without incident. 20 A. Yes. 21 Q. You go on that Mr Lawler informed you that the operation 22 would "probably be stood down for the weekend period". 23 Can you tell us anything more about that, please? 24 A. I think that is as it reads, that I had a call from 25 Mr Lawler saying it had been stood down without</p> <p style="text-align: center;">Page 127</p>
<p>1 that was provided by Mr Lawler when he spoke to you at 2 that time? 3 A. I think the next line under the attachment there is, 4 "GMP intend to stand down at 07.30, so it probably won't 5 affect you." 6 Would in my mind confirm that I hadn't had a call 7 throughout the night from Mr Lawler. 8 Q. Yes, and would it be fair to say that the information as 9 to GMP intending to stand down at 7.30 in the morning 10 would likely be information Mr Lawler provided you in 11 that call after -- 12 A. In the initial conversation. 13 Q. Yes. 14 We can also see reference to information that -- 15 I want to ask you whether it came from Mr Lawler, we can 16 see reference to: 17 "However, GMP have told us that the target premises 18 referred to in the above attachment have got cash 19 deliveries expected around 11.00 am. They don't have 20 intel to suggest that the subjects will target these 21 deliveries, but it may be prudent to put 22 a follow-that-van prevention tactic in place. The 23 officer in charge of the GMP side of things is Chief 24 Inspector Mike Lawler, and it might be worth giving him 25 a call. It might warrant a discussion on level 2, hence</p> <p style="text-align: center;">Page 126</p>	<p>1 incident, and that, indeed, he has made a comment that 2 it would probably be stood down for the weekend period. 3 I don't know the provenance of that, that would 4 I presume is the conversation I had with Mr Lawler. 5 Q. Can you help us at all as to what the basis was for GMP 6 standing down the operation over the weekend? 7 A. I can't, I am afraid. As I say, it was a Greater 8 Manchester operation, so my role wasn't to sort of 9 question the operational decision. That was the 10 information that I was told. 11 Q. I have already asked you as to whether Mr Lawler gave 12 you any information in that 6.00 in the morning handover 13 essentially telling you the operation was going to be 14 stood down, as to whether he told you that the vehicle 15 had been to Culcheth that evening. 16 Can I ask you at any point over the evening of 17 1 March into 2 March, do you have any knowledge that 18 anybody gave you any information as to the stolen Audi 19 travelling to the parade of shops at Culcheth -- to 20 Jackson Avenue and Common Lane I should say? 21 A. There is the passage of time, but I don't believe so. 22 Q. You tell us in your statement that you requested that 23 the Greater Manchester intelligence unit make contact 24 with the intelligence unit at Cheshire so that the force 25 had knowledge of the operation as you had just concluded</p> <p style="text-align: center;">Page 128</p>

1 your final night cover locum duty. Can you explain why
 2 you made that request of GMP, please?
 3 **A. Yes, the previous point I made about the best**
 4 **information we get we are able to make the best**
 5 **decisions. So for continuity, I was now off for**
 6 **basically that weekend. So some of the information,**
 7 **some of the tactics might well be sensitive but the**
 8 **force intelligence units, the people who work in there,**
 9 **would have access and knowledge of that and you can have**
 10 **a conversation between professionals.**
 11 **So why I would have made that request is so that we**
 12 **had the information, which we could then look to support**
 13 **in the best way we could going forward. That is why**
 14 **I asked for the force information -- force intelligence**
 15 **units to make contact with each other, but that Greater**
 16 **Manchester contact us.**
 17 Q. If we turn then, please, into the bundle behind tab 7,
 18 we can see that at 6.59 in the morning on 2 March you
 19 confirm to Mr Brierley and John Betts:
 20 "Chris, John, just been told the GMP op is stood
 21 done and they are going to get in touch with our intel
 22 unit regarding the op and info re cash in transit."
 23 Can I ask, in terms of the reference to info re cash
 24 in transit, just to clarify that that related to?
 25 **A. The previous around a -- the information that I was**

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1 **given by GMP but unfortunately cannot remember exactly**
 2 **who gave it.**
 3 Q. That is the reference in your statement to there may be
 4 cash in transits that morning?
 5 **A. Yes.**
 6 Q. You tell us, in addition to sending that email you
 7 verbally briefed Mr Brierley, who was undertaking the
 8 locum duties on 2 March. Can you assist as to whether
 9 there was anything else that you verbally briefed to
 10 Mr Brierley?
 11 **A. I am afraid I can't do with any certainty, but the**
 12 **briefing, because I had sent something on email, would**
 13 **have been very short, probably referring to**
 14 **Chris Brierley to make sure that he picked up those**
 15 **emails and he was aware of those email.**
 16 Q. Thank you.
 17 I think that concluded your involvement prior to the
 18 shooting of Mr Grainger on 3 March?
 19 **A. It did, yes.**
 20 Q. Can I just, for completeness, we have been provided with
 21 a transcript following on from the incident in Culcheth,
 22 and if I can just take you to that for completeness, it
 23 is behind tab 8.
 24 It is the internal page, page 12, it is a transcript
 25 of an audio file of a discussion at 6.54 on 4 March 2012

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1 between you and Mr Stead.
 2 THE CHAIRMAN: Stead.
 3 **A. Stead.**
 4 MS CARTWRIGHT: Stead. Thank you.
 5 If I could ask you to turn over to page 13, can
 6 I just ask you, you are being asked if Culcheth is on
 7 your area or something and you respond:
 8 "No, no, no, that is why -- I mean I had a feeling
 9 the job, that the job that involved, it was the one over
 10 at erm that we briefed about, er, and I was on duty
 11 Thursday night when, but when they sort of, you know,
 12 told us it was happening, they gave us some details but
 13 apart from that, that was it."
 14 **A. Yes, and I do remember this call, because as it suggests**
 15 **I had missed a call on my phone --**
 16 Q. Yes.
 17 **A. -- on the Saturday evening.**
 18 Q. Yes.
 19 **A. But there was no message left, so I left it. And**
 20 **I remember waking up the next day, checking my**
 21 **smartphone and I saw that there was an incident in**
 22 **Culcheth and then I think it was on the BBC news. That**
 23 **is what prompted this call. Because I had missed --**
 24 **I am a post-incident manager, also when you cover locum**
 25 **and a job, an incident, comes in and you are on duty, if**

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1 **you pick something like that up in Cheshire, you are**
 2 **naturally interested, because, you know, that is the**
 3 **nature of, 1, the person I am and, 2, my professional**
 4 **interest.**
 5 **And because I had missed this call as well, I was**
 6 **concerned that maybe an incident like this, where there**
 7 **is a shooting, would need a lot of resources, a lot of**
 8 **staffing. Included in that would be a post-incident**
 9 **manager, and at the time we didn't have a whole load of**
 10 **post incident managers and I wondered whether that was**
 11 **the reason.**
 12 Q. Just perhaps to explore for completeness, the transcript
 13 tells us that the missed call from 3 March had been
 14 about 10.30, but that was from a blocked number?
 15 **A. That is how the calls come through from the**
 16 **constabulary, but I couldn't say that was from the**
 17 **constabulary.**
 18 Q. No.
 19 Thank you. Then going back over the page, please,
 20 just to complete what was said at that time, the FIM,
 21 Mr Stead says:
 22 "That is all we got yesterday to be fair until, erm,
 23 you know, until it went on but it is all in hand now
 24 really, it is just a matter of dealing with the post
 25 incident."

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1 Your response is:
 2 "Right, well maybe that was it, maybe it was the
 3 post incident I was called about."
 4 **A. Yes.**
 5 Q. Then he makes reference about making a note.
 6 Really even at that stage you were not able to
 7 provide all that much detail about what had been
 8 provided on 1 March and 2 March to you?
 9 **A. No, that wasn't -- I wouldn't provide that to the FIM,**
 10 **no.**
 11 **MS CARTWRIGHT: No.**
 12 **Thank you. If you just excuse me one moment.**
 13 **Thank you, those are my questions.**
 14 THE CHAIRMAN: Ms Whyte.
 15 MS WHYTE: Just a couple.
 16 Questions from MS WHYTE
 17 MS WHYTE: Superintendent, I ask questions on behalf of
 18 Greater Manchester Police.
 19 Could I ask you to go to tab 5 of the smaller
 20 bundle, that is the one directly in front of you, and
 21 look at the email you sent at about 5.00 in the morning
 22 on 2 March to Mr Brierley. Do you have that?
 23 Thank you. You say:
 24 "Chris, as of 1.00 am this morning GMP are running
 25 an operation."
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1 What did you think was going to start potentially
 2 happening at 1.00 am?
 3 **A. I believe, from my recollection, that was the start of**
 4 **Op Shire.**
 5 Q. What do you mean by "Op Shire"?
 6 **A. The operation that I was sent the operation order for.**
 7 Q. Are you referring to the deployment of authorised
 8 firearms officers who were going to be potentially
 9 surveilling or providing support to surveillance
 10 officers?
 11 **A. Yes.**
 12 Q. That being a MASTS operation?
 13 **A. The MASTS op, yes.**
 14 Q. When you refer to "Op Shire", just to be absolutely
 15 clear, you are not referring to unfollowed suspects
 16 moving in an Audi, you are referring to the deployment
 17 of armed officers who have received a briefing about
 18 whatever tactical options they are intending to pursue,
 19 which in this case, as we know, is a MASTS. Is that
 20 right?
 21 **A. The Op order, which I believe is Op Shire, that is what**
 22 **I believe was moving from 1.00 am, as I can remember,**
 23 **yes.**
 24 Q. The conversations you were having on 1 March, and in
 25 particular the meetings at 6.00 in the evening, all
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1 preceded, in fact, the potential deployment? The
 2 potential operation by a number of hours?
 3 **A. I mean I didn't have full knowledge of what Greater**
 4 **Manchester were doing, so I can say that that is what**
 5 **I believe from 1.00 am, that was Op Shire.**
 6 Q. In fact, just so you are aware, that accords with what
 7 happened, the officers were briefed at about 1.00 in the
 8 morning on the morning of 2 March.
 9 Can you then, please, go to tab -- I hope it is the
 10 same as mine -- 3, and look at that email you have been
 11 asked about from Mr Bailey to Mike Lawler, and to
 12 yourself and I think the DCC as well, as he was at the
 13 time, Mr Gerrard.
 14 **A. Yes.**
 15 Q. That follows, I think, the 6.00 meeting in the evening
 16 you have told us about?
 17 **A. Yes.**
 18 Q. We can see the fifth put point uses the same language:
 19 "In the event that Op Shire enters Cheshire, at
 20 an appropriate time you will inform the FIM and
 21 [yourself] the TFC."
 22 Op Shire, as I have read that, and I want you to
 23 correct me if I am wrong so that we know what questions
 24 to ask any relevant GMP officers. Op Shire there,
 25 I have understood to be a reference to the movement of
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1 the armed officers over into Cheshire.
 2 **A. From my recollection, I believe that Op Shire was the**
 3 **movement of those officers, as according to the**
 4 **operational order that I was sent.**
 5 MS WHYTE: Yes. Thank you very much indeed.
 6 MS CARTWRIGHT: No further questions. Thank you, sir.
 7 Questions from THE CHAIRMAN
 8 THE CHAIRMAN: In relation to the second bullet point of the
 9 same email, that refers to movement prior to Op Shire,
 10 so that is again there referring to any movement before
 11 1.00 am, in effect, before the deployment, the MASTS
 12 deployment.
 13 **A. Yes, as -- and that I think, sir, ties into what I have**
 14 **just said around Op Shire was the sort of 1.00 onwards**
 15 **and prior to --**
 16 THE CHAIRMAN: There was a contingency in place for a GMP
 17 ARV to intercept.
 18 **A. That is as I understand it, yes.**
 19 MS CARTWRIGHT: That concludes the questioning, sir.
 20 Thank you, Mr Crowcroft.
 21 THE CHAIRMAN: Thank you very much, Mr Crowcroft, for
 22 helping the Inquiry. That is the end of your evidence.
 23 MS CARTWRIGHT: Sir, that concludes the evidence of the
 24 Inquiry today. Can we adjourn until 10.30 tomorrow?
 25 THE CHAIRMAN: 10.30 tomorrow, certainly.
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<p>1 Thank you very much. 2 (3.34 pm) 3 (The Inquiry adjourned until 10.30 am the following day) 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 137</p>	
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