

<p>1 Tuesday, 28 March 2017 2 (10.30 am) 3 (Morning proceedings in closed session) 4 (2.20 pm) 5 THE CHAIRMAN: Sorry, Mr Beer. 6 Before we go any further I ought perhaps to explain 7 that we have two guests with us. They are, sitting 8 further from me, Judge Kinefuchi and, sitting closer to 9 me, Judge Ikemoto. They are both from the Tokyo 10 District Court, they are judges of that court. 11 Judge Kinefuchi sits on criminal cases and Judge Ikemoto 12 is currently pursuing a course at the University of 13 Warwick but when sitting in Tokyo sits, as I understand 14 it, on civil and administrative cases. They are both 15 here on long-term visits to this country, of the order 16 of a year, but will be spending the rest of this week 17 observing this Inquiry and also other proceedings in 18 this building that are likely to be of interest to the 19 particular research projects they are pursuing. 20 They will join me on this bench when circumstances 21 permit, that is to say when open proceedings are in 22 progress and screens have not been directed. 23 MR BEER: Sir, yes. 24 THE CHAIRMAN: Certainly not in closed proceedings, as this 25 morning, they are not present and they were sitting in</p> <p style="text-align: center;">Page 1</p>	<p>1 them, please use the cypher key, I think you will be 2 familiar with that process but it is best to keep it 3 open just as a double check. 4 A. Thank you. 5 Q. Secondly, there should be a lever arch file in which are 6 contained five witness statements and I am going to ask 7 you in a moment whether four of them are true. The 8 fourth of them is about special measures, so I am not 9 going to ask you about that. 10 If you look at tab 1, please, in fact it is only 11 a single page, a witness statement dated 7 March 2012. 12 Is that your witness statement? 13 A. It is, yes. 14 Q. Then, over the tab, to tab 2, please, dated 15 9 March 2012, is that your witness statement? 16 A. It is, sir, yes. 17 Q. Tab 3, please, a witness statement dated 28 May 2012, is 18 that your witness statement? 19 A. It is, yes. 20 Q. If you skip over tab 4, which is about special measures, 21 and go to tab 5, a very short witness statement. Is 22 that your witness statement dated 31 July 2014? 23 A. Yes, sir, it is. 24 Q. Are the contents of those statements true to the best of 25 your knowledge and belief?</p> <p style="text-align: center;">Page 3</p>
<p>1 another court in the building. 2 I hope that explains their presence. They are very 3 welcome, both of them and I hope that they enjoy their 4 stay in Liverpool and particularly their time observing 5 proceedings of this Inquiry. 6 MR BEER: Thank you, sir. 7 THE CHAIRMAN: Mr Granby, we have now as I understand it 8 reached the end of your evidence. 9 That's correct I think, Mr Beer, is it? 10 MR BEER: That's correct, sir. 11 THE CHAIRMAN: I can now formally release you. 12 MR BEER: Thank you very much, sir. 13 It is U9, please. 14 THE CHAIRMAN: Yes. 15 U9 (sworn) 16 THE CHAIRMAN: Thank you. 17 Questions from MR BEER 18 MR BEER: Yes. 19 U9, my name is Jason Beer and I ask questions on 20 behalf of the Inquiry. In front of you there, there 21 should be on your left-hand side a cypher key, on which 22 your name appears. Can you see that? 23 A. Yes, I can, yes. 24 Q. Certain other officers who benefit from orders of 25 anonymity are listed on there. If you wish to refer to</p> <p style="text-align: center;">Page 2</p>	<p>1 A. They are, yes. 2 Q. Thank you. 3 Can we start with some background, please. When did 4 you join the police service? 5 A. October 1996. 6 Q. Are you still serving? 7 A. I am, yes, sir. 8 Q. In March 2012, what rank were you? 9 A. Police Constable. 10 Q. Does that remain the case? 11 A. It does, sir, yes. 12 Q. In March 2012, what function were you performing, what 13 was your role? 14 A. I was a temporary instructor within the firearms 15 training unit, seconded from the operations team. 16 Q. That is the FTU rather than the TFU? 17 A. It is, yes. 18 Q. Did you nonetheless carry out duties as an AFO? 19 A. I did, sir, yes. 20 Q. What was the balance of your time as between each of 21 them, instructing and doing? 22 A. It would depend on what was happening within the 23 instructional world. At that time I was seconded on 24 a semi-permanent basis to the firearms training unit. 25 Q. You cannot give an approximation of what took up your</p> <p style="text-align: center;">Page 4</p>

<p>1 time?</p> <p>2 A. I couldn't really say. As I said, it depends on what</p> <p>3 was happening that needed to be instructed on.</p> <p>4 Q. When did you first qualify as an AFO?</p> <p>5 A. 2002.</p> <p>6 Q. Between 2002 and March 2012, had you received any</p> <p>7 training as a CTSFO?</p> <p>8 A. While I was there a CTSFO programme was not up and</p> <p>9 running within GMP. However, I did take part in hostage</p> <p>10 rescue and dynamic intervention training which would</p> <p>11 become part of CTSFO skills.</p> <p>12 Q. Okay, had you undergone refresher training as an AFO</p> <p>13 by March 2012?</p> <p>14 A. I had, sir, yes.</p> <p>15 Q. Had you undergone initial and then refresher training in</p> <p>16 the MASTS tactic or option?</p> <p>17 A. Yes, sir, I had.</p> <p>18 Q. Were you a member of the TFU or an ARV officer?</p> <p>19 A. ARV officer up until 2005, and then I joined the</p> <p>20 resource and planning tasking team, currently the ops</p> <p>21 team, in 2005 until 2012.</p> <p>22 Q. In March 2012, if there was a document or publication</p> <p>23 that governed the way in which you discharged your</p> <p>24 duties as a firearms officer what would you say it was?</p> <p>25 A. That would be the manual of guidance on police use of</p> <p style="text-align: center;">Page 5</p>	<p>1 a MASTS led operation?</p> <p>2 A. Yes, sir, I did.</p> <p>3 Q. By March 2012, what experience did you have on the</p> <p>4 ground of participating in MASTS operations? If you</p> <p>5 give us an idea of frequency.</p> <p>6 A. Frequency? In the early years within the operations</p> <p>7 team we were very busy with MASTS operations especially,</p> <p>8 within the Manchester area.</p> <p>9 Q. Is that from 2005 onwards?</p> <p>10 A. Yes, when I joined the ops team. I would say we were</p> <p>11 deployed about 60/70 times a year, not all involved</p> <p>12 a final outcome.</p> <p>13 Q. By "final outcome", that is a capable of a number of</p> <p>14 definitions.</p> <p>15 A. Well, since my period in the ops team I would say</p> <p>16 I carried out between 20, 30, maybe a bit more, actual</p> <p>17 strikes within a MASTS tactic, but been deployed</p> <p>18 hundreds of times and not been used.</p> <p>19 Q. Was the grant of authority to use special munitions</p> <p>20 a normal part of the authorisation to use the MASTS</p> <p>21 tactic, as we are calling it?</p> <p>22 A. It wasn't always given. It was requested at higher</p> <p>23 level and, depending on what the threat was, would be</p> <p>24 whether we would get authority to carry the equipment</p> <p>25 with us.</p> <p style="text-align: center;">Page 7</p>
<p>1 firearms, or the national firearms training curriculum.</p> <p>2 Q. What about in relation to MASTS?</p> <p>3 A. That would come under the national police firearms</p> <p>4 training curriculum, that is where we get all our</p> <p>5 information from to carry out the tactic.</p> <p>6 Q. Were you aware of any particular document within GMP</p> <p>7 that regulated the MASTS tactic, other than the national</p> <p>8 ones that you spoke of?</p> <p>9 A. No, I wasn't, sir, no.</p> <p>10 Q. Were you trained in the use of in special munitions?</p> <p>11 A. Yes, I was, sir.</p> <p>12 Q. Which, please?</p> <p>13 A. The shotgun and the CS dispersal canister and any other</p> <p>14 pyrotechnic.</p> <p>15 Q. In relation to the CSDC, was there any, to your</p> <p>16 knowledge, document within GMP that governed the use of</p> <p>17 the CSDC?</p> <p>18 A. There would have been some documentation within GMP</p> <p>19 regarding standard operating procedures.</p> <p>20 Q. It was it a document you can remember now that you were</p> <p>21 in possession of or had read?</p> <p>22 A. Not that I can remember, sir, no.</p> <p>23 Q. Okay.</p> <p>24 By March 2012, did you regard yourself as</p> <p>25 occupationally and operationally competent as an AFO in</p> <p style="text-align: center;">Page 6</p>	<p>1 Q. In relation to the 20 to 30 MASTS deployments that had</p> <p>2 ended in the final outcome as you have described it,</p> <p>3 what proportion of those involved the use of special</p> <p>4 munitions of one sort or another?</p> <p>5 A. I would say about 70 per cent, as a rough guess.</p> <p>6 Q. Turning to events more directly related to the reason</p> <p>7 why we are here, other than in relation to</p> <p>8 Operation Shire, did you have any knowledge of the three</p> <p>9 subjects who you were briefed on, amongst other dates,</p> <p>10 on 2 and 3 March 2012, Mr Totton, Mr Rimmer, and</p> <p>11 Mr Grainger?</p> <p>12 A. I had, sir, yes.</p> <p>13 Q. This is other than in relation to the course of</p> <p>14 Operation Shire?</p> <p>15 A. Yes, sir, I had.</p> <p>16 Q. Starting with Mr Totton, what if any was your previous</p> <p>17 knowledge of him and how was it obtained?</p> <p>18 A. My first posting was in Salford and the Totton name was</p> <p>19 well known within the policing fraternity within the</p> <p>20 Salford area.</p> <p>21 Q. What does that mean?</p> <p>22 A. He was a known criminal within Salford.</p> <p>23 Q. And known for?</p> <p>24 A. Various things resulting from car thefts and robberies</p> <p>25 et cetera.</p> <p style="text-align: center;">Page 8</p>

<p>1 Q. Sorry, I have just had a request, if you could speak up, 2 please, I think because of the effect of the curtain it 3 may be a little difficult to hear over here. 4 A. That may be better. 5 Q. I think you were saying car thefts and robberies? 6 A. Yes, from memory, yes. 7 Q. Mr Rimmer, Robert Rimmer? 8 A. That name wasn't known to me. 9 Q. Mr Grainger? 10 A. Mr Grainger's name was known to me, yes. 11 Q. In what context was it known to you? 12 A. Cars normally. Car thefts. 13 Q. Car thefts, yes? 14 A. And, towards the latter stage, what we used to call ram 15 raids within the Manchester area. 16 Q. What do you mean the latter stages? 17 A. Of my time within the Salford division. 18 Q. So what time was that? 19 A. 2002. 20 Q. You say that he was known for it, convicted of it? 21 A. I am not sure about that, but the name cropped up on 22 numerous occasions. 23 Q. Were you involved in an operation called Operation 24 Blythe? 25 A. I can't remember, sir.</p> <p style="text-align: center;">Page 9</p>	<p>1 to go through each of the operations, going back to the 2 end of 2011 into the end of February, I think we would 3 see that they had changed. That there was an initial 4 focus on the Corkovic group -- 5 A. Yes. 6 Q. -- with Mr Totton as either a subject or as an associate 7 and then by the time we reached 2 and 3 March, it had 8 changed and the subjects were Mr Totton, Mr Grainger and 9 Mr Rimmer. 10 How did you go about distinguishing between what you 11 had been told in Operation Shire in those early 12 briefings, which was concerned with principally the 13 Corkovic group, with what you were subsequently told on 14 2 and 3 March, or didn't you? 15 A. Not really, no. The information that we were given on 16 the day is what concerns the AFOs on that day. So any 17 left overs from previous briefings didn't really cause 18 any issues with us, it was what we were told on that 19 day. 20 Q. Okay, and is that an -- I think as AFOs you would quite 21 often be deployed on the same operation on a number of 22 deployments? 23 A. That's correct, sir, yes. 24 Q. Was this therefore a recurring theme, that you would be 25 briefed up as if from scratch on each occasion?</p> <p style="text-align: center;">Page 11</p>
<p>1 Q. When was your first involvement in Operation Shire? 2 A. I think it was early or mid 2011, if I can remember 3 correctly. I deployed on it numerous occasions 4 throughout the end of 2011 and 2012. 5 Q. Closer to the events we are concerned with, I think you 6 were an attendee at two briefings, one on 1 into 2 March 7 and then one on the early morning of 3 March? 8 A. Yes. 9 Q. Mr Lawler's operation and Mr Granby's operation 10 respectively; is that right? 11 A. That's correct, sir, yes. 12 Q. You had I think been -- I am not going to go through 13 past history of attendance at other briefings -- in 14 attendance at other briefings; is that correct? 15 A. That's correct, sir, yes. 16 Q. To what extent did you retain any knowledge from those 17 other briefings by the time it reached 2 or 3 March? 18 A. I think the general gist of what was said in each 19 briefing stayed there, because it was an ongoing 20 operation. You knew the subjects were the same, 21 usually, you had a different subject every now and again 22 but the usual core of the subjects were still the same 23 and the attempt at what we thought they were going to do 24 stayed the same generally. 25 Q. You said that the subjects stayed the same, if we were</p> <p style="text-align: center;">Page 10</p>	<p>1 A. You would be briefed in the normal manner every time, 2 sir, yes. 3 Q. Was it consciously recognised by you and perhaps your 4 colleagues that you should put out of your mind that 5 which you had learned previously on other briefings, 6 which may or may not be accurate? 7 A. I wouldn't say it was a conscious effort, but we took 8 the information on each briefing as we were given it on 9 that particular day. 10 Q. I understand that, but to what extent did you actually 11 apply your mind to thinking: 12 "Well, hold on I've got some recollection of these 13 people from three days ago, a month ago, a fortnight 14 ago, three months ago, I am going to ignore that, 15 I start afresh today, you know, with ground zero, here 16 today I am just going to listen to what this man here is 17 telling me and that is it." 18 A. I don't think you can ever ignore the previous ones you 19 have been on, especially if it is the same subjects. 20 However, the information may have changed depending on 21 what that operation was, it might be the same operation 22 or a different one. You get to know what the subjects' 23 capabilities are from previous jobs, so I wouldn't say 24 you completely forget it but each day you take each 25 briefing as it comes.</p> <p style="text-align: center;">Page 12</p>

3 (Pages 9 to 12)

1 Q. Were you aware, for example, that by 2 and 3 March 2012,
 2 the SIO had split the operation into two?
 3 **A. No, I was not, sir, no.**
 4 Q. To what extent are you usually given an assessment as to
 5 the reliability of intelligence in the course of
 6 a briefing.
 7 **A. In the course of the briefing? None that I can**
 8 **remember, sir, no.**
 9 Q. I am not talking about Shire. I am talking about
 10 generally. To what extent are you normally given
 11 an assessment as to the reliability of intelligence?
 12 **A. Every briefing comes with a subject briefing that gives**
 13 **you the previous history, any warning markers, any new**
 14 **intelligence, any old intelligence that is relevant to**
 15 **that operation.**
 16 Q. Is it just given to you as that, as fact, rather than
 17 a distinction drawn between the content of the
 18 intelligence and how reliable or accurate it is assessed
 19 to be?
 20 **A. We sometimes get told using the 5x5 system what the**
 21 **intelligence rating is but not all the time.**
 22 Q. Do you know what determined whether you were or you
 23 weren't told by reference to the National Intelligence
 24 Model 5x5 system?
 25 **A. No. Sometimes we were told, sometimes we weren't.**

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1 Q. You just took what you were given?
 2 **A. Yes.**
 3 Q. How did you approach intelligence that was given to you
 4 that had not been graded by the 5x5 system?
 5 **A. You just took it as what was told to us.**
 6 Q. I realise that, but what store did you place by it? How
 7 did you handle it if it hadn't been disseminated with
 8 a grading?
 9 **A. I think if we were told by the briefing officer that the**
 10 **intelligence that we were being given came from the**
 11 **police or wherever it came from, we took that as fact**
 12 **and correct.**
 13 Q. Okay.
 14 In Operation Shire, certainly on 2 and 3 March,
 15 there were three subjects, Mr Totton, Mr Rimmer and
 16 Mr Grainger, and there was an individual threat
 17 assessment in relation to each of them. How do you
 18 approach the question of individualised threat
 19 assessments when you are told that three people are
 20 acting or thought to be acting jointly?
 21 **A. Do you mean beforehand or at the time of the operation?**
 22 Q. Beforehand, when you are being given the information,
 23 what use do you make of an individualised threat
 24 assessment?
 25 **A. We take it on board, what the capability is, to start**

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1 **with. If they have got prior warnings, especially for**
 2 **firearms and violence, we take that on board.**
 3 **But when it comes to the actual job itself, we have**
 4 **not got time to individualise threat assessments.**
 5 Q. When you say "When we come to the job itself", do you
 6 mean when you are deployed on the ground and you come
 7 across people?
 8 **A. Yes, in the process of carrying out arrests for example.**
 9 Q. Yes. You say you don't have a chance to, do you mean
 10 that you don't link an identity to the picture that you
 11 have been shown?
 12 **A. No.**
 13 Q. They are just people?
 14 **A. Yes.**
 15 Q. Is that because of how quickly you do things?
 16 **A. It is, sir, yes.**
 17 Q. There isn't -- sorry, I spoke over you.
 18 **A. It is, sir, yes.**
 19 Q. You just don't have the chance to think, "Right, that is
 20 Grainger, he is the driver, he has or has not got
 21 a firearms marker"?
 22 **A. That's correct, yes. The whole thing could be over in**
 23 **10 seconds.**
 24 Q. Okay, and do they all blur into one?
 25 **A. I wouldn't say they blur into one. We take each**

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1 **individual that we come across on the individual's**
 2 **merits at that time.**
 3 Q. It was a bad question from me.
 4 Obviously their actions are individualised, if
 5 somebody is standing compliantly with their arms by
 6 their side without a weapon, that is one thing. If
 7 somebody has a semi-automatic weapon aimed at you, you
 8 take each of those on their merits. Does the
 9 intelligence briefing that you had previously received
 10 on an individual basis, by the time you are deployed on
 11 the ground rather blur into one?
 12 **A. Whether it blurs into one or I would say we take it,**
 13 **each individual as we find them. If that ends up being**
 14 **the same for each individual, then I suppose you could**
 15 **say it does blur into one.**
 16 Q. Thank you.
 17 Can we turn to 2 March then, please.
 18 You should have near you two folders that have
 19 written on their spines, "General bundle: firearms
 20 officers".
 21 If you haven't they will be handed to you in
 22 a moment, U9. Here they come. (Handed)
 23 There should be two of them. I want to look at the
 24 second one, please, which I think is tab 19 onwards. In
 25 particular look at tab 20, please.

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<p>1 A. Yes.</p> <p>2 Q. Can you see this is a PowerPoint or a copy of</p> <p>3 a PowerPoint presentation of 2 March, yes?</p> <p>4 A. Yes, sir, yes.</p> <p>5 Q. If you look at the second page, I don't think you are</p> <p>6 shown as present there. Is that right?</p> <p>7 A. That's correct, yes.</p> <p>8 Q. If you go forward, please, to tab 21. This is</p> <p>9 a transcript of the recording of that briefing given by</p> <p>10 Messrs Lawler and X7.</p> <p>11 A. Yes.</p> <p>12 Q. At the roll call at the beginning, I don't think you</p> <p>13 were present there. Is that right?</p> <p>14 A. I wasn't, no.</p> <p>15 Q. If we therefore go forward to the briefing on the day,</p> <p>16 3 March, in tab 22. Can you see that?</p> <p>17 A. Yes, I have it, sir, yes.</p> <p>18 Q. Can you see at page 1266 you are listed as amongst the</p> <p>19 officers on the roll call?</p> <p>20 A. I am, sir, yes.</p> <p>21 Q. If you go forwards to tab 23, at page 333, the second</p> <p>22 line down, I think you called out your name?</p> <p>23 A. I did, sir, yes.</p> <p>24 Q. Yes.</p> <p>25 You were present in the course of this briefing and</p> <p style="text-align: center;">Page 17</p>	<p>1 THE CHAIRMAN: Sorry.</p> <p>2 A. Travelling criminals.</p> <p>3 THE CHAIRMAN: Travelling criminals?</p> <p>4 A. Yes, sir.</p> <p>5 MR BEER: Is that the kind of paragraph that you might</p> <p>6 sometimes, where a belief is expressed, and it is not</p> <p>7 obviously referring to an incident or incidents, have</p> <p>8 received a grading?</p> <p>9 A. I wouldn't imagine any gradings come from that opening</p> <p>10 statement, no, sir. I wouldn't.</p> <p>11 Q. Sorry?</p> <p>12 A. I wouldn't imagine any gradings being given for that</p> <p>13 opening line.</p> <p>14 Q. You say that you would not imagine that gradings had</p> <p>15 been given for the opening line --</p> <p>16 A. Not unless the SIO had any specific intelligence.</p> <p>17 Q. So what, you took this to be a general statement as of</p> <p>18 the operation's belief, the SIO's belief?</p> <p>19 A. What it is believed to be, yes.</p> <p>20 Q. The second paragraph:</p> <p>21 "There is intelligence to suggest that these</p> <p>22 subjects were responsible for a robbery in 2008 where</p> <p>23 they broke into a bank and lay in wait for the staff to</p> <p>24 arrive. On their arrival they were held at gunpoint,</p> <p>25 shotgun and handgun, tied up and forced to hand over</p> <p style="text-align: center;">Page 19</p>
<p>1 for the duration of the briefing; is that right?</p> <p>2 A. I was, sir, yes.</p> <p>3 Q. Have you recently refreshed your memory by looking at</p> <p>4 these, the PowerPoint and the transcript?</p> <p>5 A. I have, sir, yes.</p> <p>6 Q. Before you looked at those, what was your memory of it</p> <p>7 like?</p> <p>8 A. Any other briefing I suppose I have been involved in,</p> <p>9 you attend the briefing, the introduction is given, any</p> <p>10 intelligence or information is normally given by</p> <p>11 a senior investigating officer who is there. And we</p> <p>12 then go through the normal motions of who is doing what,</p> <p>13 what car you are in, what equipment you have got and</p> <p>14 an intel briefing on each of the subjects.</p> <p>15 Q. The information and intelligence starts at page 1267 at</p> <p>16 tab 22; can you see that?</p> <p>17 A. Yes.</p> <p>18 Q. And this was read out in the course of the briefing.</p> <p>19 A. It was, sir, yes.</p> <p>20 Q. If we go through each of the paragraphs:</p> <p>21 "The subjects of this operation are believed to be</p> <p>22 engaged in armed robberies in the north-west region."</p> <p>23 What if anything did you take from that, take away</p> <p>24 from the briefing and that sentence?</p> <p>25 A. Travelling criminals, sir.</p> <p style="text-align: center;">Page 18</p>	<p>1 keys to the strong room. The subjects made good their</p> <p>2 escape with a substantial amount of the money."</p> <p>3 A. Yes.</p> <p>4 Q. Did you understand the reference to "these subjects" to</p> <p>5 be a reference to Messrs Totton, Rimmer and Grainger who</p> <p>6 you were about to hear about?</p> <p>7 A. I did, sir, yes.</p> <p>8 Q. You took this to be a statement that these three men</p> <p>9 were responsible for a robbery involving two firearms?</p> <p>10 A. Yes, sir, I did, yes.</p> <p>11 Q. Does this fall into what you described earlier as</p> <p>12 something you would have treated as fact if the police</p> <p>13 were telling you, if an officer was telling you this</p> <p>14 based on police documents, then you would treat it as</p> <p>15 established fact?</p> <p>16 A. We do, sir, yes. We assume that the time it has taken</p> <p>17 to get to this stage, this is the final stage of the</p> <p>18 operation for some, we take it that the intel and the</p> <p>19 information is correct and been checked.</p> <p>20 Q. So a bit like Mr Trump might say: it had gone through</p> <p>21 a finely tuned machine?</p> <p>22 A. Yes, sir.</p> <p>23 Q. The third paragraph:</p> <p>24 "The subjects have access to a stolen red Audi A6</p> <p>25 displaying VRM [then the index is given] currently</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

1 parked in Boothtown."
 2 That doesn't I think tell you much about the
 3 subjects or their intention, other than that they are
 4 using a stolen car?
 5 **A. That's correct, sir, yes.**
 6 Q. Then lastly:
 7 "The subjects have been observed conducting recces
 8 in Culcheth town centre, although it is unclear at this
 9 time what the specific target may be."
 10 Overall, on that page, so far, it is probably
 11 difficult to remember back five years what you took from
 12 a single page, but looking at it now, what was the
 13 take-home message that the briefing officers were
 14 sending you away with?
 15 **A. We had a group of travelling criminals, access to stolen**
 16 **vehicles, they had been on preparatory recces to commit**
 17 **crime and they may be in possession of firearms.**
 18 Q. Turning over the page, please, to 1268.
 19 **A. Yes, sir.**
 20 Q. A threat assessment for Mr Totton, his identity is given
 21 along with two photographs of him and a short
 22 description.
 23 Then his capability. In general terms, what does --
 24 other than the obvious English language definition of
 25 the word "capability" -- in the context of firearms

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1 operations, "capability" mean?
 2 **A. For us, I would take it as previous history.**
 3 Q. It is said the warnings are for possession of a shotgun
 4 in 1999, did you understand that to be a warning
 5 marker --
 6 **A. Yes, yes, sir I did, yes.**
 7 Q. -- for possession?
 8 What did you understand a warning marker to be based
 9 on?
 10 **A. Either a criminal record --**
 11 Q. Yes.
 12 **A. -- from an arrest and conviction, or through**
 13 **intelligence.**
 14 Q. Again, the intelligence would have been through
 15 a process that had been conducted to a certain level and
 16 sophistication to be allowing it to make this kind of
 17 statement to you?
 18 **A. It should have been checked, sir, yes.**
 19 Q. Is that similarly the case for weapons and violence?
 20 **A. It is, sir, yes.**
 21 Q. Overall, what did you take from the statements that the
 22 officers made as to the capabilities of Mr Totton?
 23 **A. He is a violent individual who has had historic access**
 24 **to firearms.**
 25 Q. Yes.

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1 As to his intent -- sorry, before I come to that, to
 2 what extent did the fact that on the previous page, so
 3 the officer reading it out had just told you that all
 4 three men had participated in a robbery with two
 5 firearms in Preston, feed into that assessment for
 6 Mr Totton?
 7 **A. I just took it as read that he was one of the**
 8 **individuals responsible.**
 9 Q. Yes.
 10 Lastly on the page then, his intent. Again, is that
 11 a statement that you understood to be the considered
 12 assessment of the operation or of the SIO that was
 13 leading it?
 14 **A. Of the operation at this current time, sir, yes.**
 15 Q. Again, something that had gone through a process in
 16 order to arrive at a formulation such as this?
 17 **A. I think their actions would give you what their intent**
 18 **was, so the previous months, if they are out scouting,**
 19 **recces-ing, for an armed robbery, that would be their**
 20 **intent that is on the briefing.**
 21 Q. Just to pick you up on that, if they had been out on
 22 three recces, and it was assessed that this was to be
 23 the fourth, would you expect to see that there?
 24 **A. Not really, sir, no.**
 25 Q. Something more guarded?

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1 **A. No, I just think the intent would be, "We believe that**
 2 **they are involved in a conspiracy to commit an armed**
 3 **robbery". That is all we would normally get.**
 4 Q. Right. Did you understand that to mean they intend to
 5 commit an armed robbery in the course of this deployment
 6 that we are going out on?
 7 **A. Possibly not in the course of the operation.**
 8 Q. At some point in the future, not necessarily tonight?
 9 **A. At some point, yes.**
 10 Q. And why?
 11 **A. Sorry?**
 12 Q. Why did you understand that to be the message being
 13 conveyed to you?
 14 **A. I think it was the fact that there has been numerous**
 15 **deployments on the same operation and their intent has**
 16 **always been the same, conspire to commit armed**
 17 **robberies. So I assume it is just a continuation of the**
 18 **same operation and the intent is still the same.**
 19 Q. Okay, so it could be that they intend physically to
 20 commit a robbery or try to tonight or it could be that
 21 this is another recces in a series?
 22 **A. That's correct, sir, yes.**
 23 Q. When you are deploying and, as was the case here, you
 24 have been told about three men and given a threat
 25 assessment of three men, and there were three men in the

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<p>1 car eventually, not the same three men as it transpired.</p> <p>2 How do you treat the information you have been given</p> <p>3 about each of their individual capabilities when you are</p> <p>4 confronting them? To an extent I have asked this</p> <p>5 before.</p> <p>6 A. Yes. I think it is an overall story of what the group</p> <p>7 is like. And whatever subject you are confronted by,</p> <p>8 you will deal with them as they appear to you at that</p> <p>9 time, you wouldn't go off any intelligence or threat</p> <p>10 assessment per se for that individual, because you</p> <p>11 wouldn't have time to.</p> <p>12 Q. Turning over the page to 1269, to Mr Rimmer. He, you</p> <p>13 were told, had served a five-and-a-half year sentence,</p> <p>14 for a section 18 assault whereby he stabbed</p> <p>15 a girlfriend's ex-partner in the abdomen and that was</p> <p>16 his marker both for warnings and violence. There you</p> <p>17 were told this was a conviction?</p> <p>18 A. It appears to be, sir, yes.</p> <p>19 Q. Does that affect you at all, the way you approach</p> <p>20 things, whether something is based on "mere</p> <p>21 intelligence" or somebody has been through the court</p> <p>22 process and a jury or by their own plea --</p> <p>23 A. Not really, sir, no. No.</p> <p>24 Q. No, you treat them the same?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 25</p>	<p>1 taken away from Mr Grainger being described as a Group 1</p> <p>2 offender?</p> <p>3 A. Group 1 offender wouldn't really pay that much attention</p> <p>4 to me. To be honest it would be the violence and</p> <p>5 weapons markers, if anything.</p> <p>6 Q. When we go to the briefing at 23, tab 23, please.</p> <p>7 A. Yes, sir.</p> <p>8 Q. We can see from page 334 that the officer rather loyally</p> <p>9 reads out that which is on the PowerPoint. Are you</p> <p>10 watching and sort of listening at the same time?</p> <p>11 A. Yes, sir.</p> <p>12 Q. Do you take any notes of that?</p> <p>13 A. No, sir, we don't.</p> <p>14 Q. Okay.</p> <p>15 When you say "We don't", does that mean collectively</p> <p>16 amongst the 16 or so AFOs?</p> <p>17 A. Generally speaking we don't take notes because we are</p> <p>18 usually working the same office so we have got a good</p> <p>19 knowledge of the operation anyway. Sometimes you do</p> <p>20 take notes if it is a new operation.</p> <p>21 Q. Other than as is set out in relation to the three</p> <p>22 subjects, the threat assessments for the three of them</p> <p>23 on the PowerPoint and as read out, did you, when you</p> <p>24 were deploying -- by that I mean going off to Leigh</p> <p>25 police station as you did --</p> <p style="text-align: center;">Page 27</p>
<p>1 Q. Okay.</p> <p>2 Lastly, over the page to 1270, Mr Grainger, you can</p> <p>3 see his warnings were that he had previously conspired</p> <p>4 to commit robberies with firearms.</p> <p>5 Would you take that to be both a weapons marker and</p> <p>6 a firearms marker?</p> <p>7 A. Yes, I would, sir, yes.</p> <p>8 Q. Would that be significant information for you?</p> <p>9 A. It would just tell us that they had previous history for</p> <p>10 firearms and they may have one at that time as well.</p> <p>11 Q. When you say "they may have one at that time", you mean</p> <p>12 if and when you come across them, on 3 March?</p> <p>13 A. That's correct, sir, yes.</p> <p>14 Q. And that he had numerous arrests for section 18</p> <p>15 offences.</p> <p>16 If -- yes, and a Group 1 offender, what did you</p> <p>17 understand that to mean?</p> <p>18 A. I understand that to be one of the top tier offenders</p> <p>19 within GMP, who are renowned for criminal activity.</p> <p>20 Q. What time of criminal activity?</p> <p>21 A. As I said, my experience often was always through</p> <p>22 driving, through stolen cars et cetera but obviously,</p> <p>23 since I joined firearms it had been more towards the</p> <p>24 robbery side.</p> <p>25 Q. Okay. In this context, what do you think you would have</p> <p style="text-align: center;">Page 26</p>	<p>1 A. Oh right, okay.</p> <p>2 Q. -- take into account any other information concerning</p> <p>3 these three subjects in your assessment of the threat</p> <p>4 that they may pose?</p> <p>5 A. No, not really, sir, no.</p> <p>6 Q. At the point at which you deployed from the police</p> <p>7 station, from Openshaw to Leigh police station, I think</p> <p>8 you had also been briefed on the threat assessment, is</p> <p>9 that right? Not the individualised one, the overall</p> <p>10 one?</p> <p>11 A. Within the briefing itself, yes.</p> <p>12 Q. If we can turn to that at tab 22, page 1271.</p> <p>13 Having looked at quite a few of these briefings</p> <p>14 myself, I imagine that these are fairly similar from</p> <p>15 time to time. Is that right?</p> <p>16 A. That's correct, sir, yes.</p> <p>17 Q. Do you pay any particular -- "attention" is probably the</p> <p>18 wrong word, of course you are paying attention, but do</p> <p>19 you notice anything standing out from these that you</p> <p>20 take into account when you deploy and if you come across</p> <p>21 subjects later on when you confront them?</p> <p>22 A. No, sir, no.</p> <p>23 Q. I don't want to be unfair to it but is this just part of</p> <p>24 the process that you go through, that some commander</p> <p>25 reads this out and you sit and listen?</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 A. It is probably given during the tactical firearms 2 commander's risk assessment meetings, prior to the 3 working strategy is set out, it is in a higher place 4 than we are. 5 Q. You are actually told this, aren't you, or not? 6 A. We are on the briefing, sir, yes. 7 Q. It doesn't bear particular relevance to you; is that 8 right? 9 A. Not a massive relevance, sir, no. 10 Q. Similarly, over the page to 1272, the working strategy 11 minimising the risk to the public and the like. Again, 12 does that strike any particular chord with you or have 13 a direct relevance to what you are going to do? 14 A. Yes, the first three or four points generally, them 15 being the top of the working strategy. 16 Q. Did you understand these are set out in priority order? 17 A. Yes. 18 Q. Here number 1 was: 19 "Minimising risk to the general public, especially 20 in the area of any police intervention." 21 Number 2 was: 22 "Minimising the risk to any cash in transit 23 custodians." 24 Then: 25 "Minimising the risk to the public in GMP and</p> <p style="text-align: center;">Page 29</p>	<p>1 as to when we may or may not be moving, in relation to 2 any potential strike that may take place. 3 Q. You are not either party to the decision making or aware 4 of the decision making, you just get the call, 5 presumably, "We are going to Amber and then Red"? 6 A. That's correct, sir, yes. 7 Q. If we move forward quite quickly then in the PowerPoint, 8 1274 is your powers and policies, the tactic is MASTS 9 with contingencies for foot or vehicle interception, 10 direct contact or containment, MASTS over the page to 11 1276 is the primary tactic. 12 Your deployments are then broken down and we can see 13 you are bravo 2 with an SLP, a Taser, a carbine and 14 a shield. Is that right? 15 A. That's correct, sir, yes. 16 Q. In the bravo vehicle. There's an explanation on 1279 of 17 the colour coding system. 18 1280, the layup point at Leigh police station, not 19 very clear on this copy. 20 The contingencies are then addressed, foot 21 interception. Yes? 22 A. Yes, sir. 23 Q. Then on to page 1282, is that a slide, as you understand 24 it, relating to the contingency of foot interception? 25 A. It is, sir, yes.</p> <p style="text-align: center;">Page 31</p>
<p>1 adjoining force areas preventing this OCG from causing 2 harm." 3 When you were briefed in the morning, we can see 4 that quite high up the list there is minimising the risk 5 to any cash in transit custodians. Did you understand 6 at that stage that the likely target was a cash in 7 transit custodian? 8 A. We took it that it may be cash in transit custodian, 9 yes. 10 Q. Why was that, is that because of what you were told? 11 A. And previous history as well, on the Op Shire. 12 Q. Had you been party to deployments where you had gone 13 down to Stoke? 14 A. That's correct, sir, yes. 15 Q. Where it was assessed that the subjects were surveying 16 a G4S depot? 17 A. That's correct, sir, yes. 18 Q. Over the page to 1273, the tipping points are addressed. 19 Is that something of direct relevance to the AFOs or is 20 that on a different plane to you, ie is the decision to 21 be made between the SIO and the -- 22 A. I would say it was more for the TFC and the OFC in 23 combination and the SIO. 24 Q. Okay, do you know why you are briefed about it? 25 A. I think it is just to give us a background information</p> <p style="text-align: center;">Page 30</p>	<p>1 Q. Can you help us as to what it means then? 2 A. Well, you have a jump off point at the top, so if we 3 have intelligence to suggest that they have gone to 4 potentially to commit a robbery within Sainsbury's, the 5 contention plan is in place of where AFOs would 6 potentially be deployed. 7 Q. So would get out of the car? 8 A. That's correct, sir, yes. 9 Q. That is the delta vehicle I think, isn't it? 10 A. Yes, sir, it is. 11 Q. Then 1283 read with 1284, the potential subject 12 premises, were you given any greater particularity over 13 what the potential subject premises that might be robbed 14 were? 15 A. I think there may have been mention of a fence in 16 relation to Sainsbury's, but apart from that nothing 17 else I know. 18 Q. Then the I think the contingency of direct contact, at 19 1285. 20 A. Yes, sir. 21 Q. Does the slide at 1286 relate to that? 22 A. It does, sir, yes. It just denotes all the premises 23 from the previous slide. 24 Q. At the moment I am just not understanding which slide 25 relates to which cover sheet, if you see what I mean.</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

<p>1 1281 and 1282 I think go together?</p> <p>2 A. Yes.</p> <p>3 Q. Yes?</p> <p>4 A. Yes, sir. 1284 gives you the Post Office, Cheshire</p> <p>5 Building Society and Thomas Cook. And 1286 just puts</p> <p>6 that on a larger scale in relation to other premises.</p> <p>7 Q. If you look at 1283, that is the eight premises that are</p> <p>8 listed on 1286?</p> <p>9 A. Yes.</p> <p>10 Q. And 1286 appears to come behind a heading of "Direct</p> <p>11 contact".</p> <p>12 A. Yes, it is just the way that the officer who has put the</p> <p>13 briefing pack together has done it.</p> <p>14 Q. What does "direct contact" mean?</p> <p>15 A. It means where you have a containment on a premises.</p> <p>16 And you put calls in to whoever is -- if the subjects</p> <p>17 are in there, directing them to come out of the premises</p> <p>18 in a controlled manner.</p> <p>19 Q. I see, so this was if the subjects made it into</p> <p>20 premises?</p> <p>21 A. That's correct, sir, yes.</p> <p>22 Q. I think you contained an area and then I think a risk</p> <p>23 assessment would be taken, would take place then, either</p> <p>24 call them out or otherwise potentially enter them?</p> <p>25 A. That's correct, sir, yes.</p> <p style="text-align: center;">Page 33</p>	<p>1 Mr Lawler's briefing. You were not present?</p> <p>2 A. No, sir, not on that day.</p> <p>3 Q. If you look at page 1179.</p> <p>4 A. Yes, sir.</p> <p>5 Q. In the second or the second paragraph of the big box,</p> <p>6 about eight lines in he says:</p> <p>7 "The reason we are at Leigh police station is</p> <p>8 obviously to intercept the subjects prior to them</p> <p>9 getting to Culcheth."</p> <p>10 Yes?</p> <p>11 A. Sir, sorry, where is that, sir?</p> <p>12 Q. It is right in between the two hole punches, the big</p> <p>13 paragraph about 10 lines in:</p> <p>14 "The reason we are at Leigh police station is</p> <p>15 obviously to intercept the subjects prior to them</p> <p>16 getting to Culcheth."</p> <p>17 Can you see that on 1179?</p> <p>18 THE CHAIRMAN: It is the second paragraph.</p> <p>19 A. Wrong page, sorry.</p> <p>20 THE CHAIRMAN: It is the seventh line of the second</p> <p>21 paragraph.</p> <p>22 A. Yes, sir, I've got that.</p> <p>23 MR BEER: Then over the page, please to 1180.</p> <p>24 A. Yes, sir.</p> <p>25 Q. "Whilst we are on the subject, our intention is to</p> <p style="text-align: center;">Page 35</p>
<p>1 Q. Right.</p> <p>2 To 1287, please, "Actions", I think that is about</p> <p>3 trauma support.</p> <p>4 A. Yes, sir.</p> <p>5 Q. Then there are some other slides that I am not going to,</p> <p>6 I think, take you through. There are reminders on human</p> <p>7 rights issues and the like.</p> <p>8 Had you experienced in the past PowerPoint</p> <p>9 presentations that gave some greater detail, including</p> <p>10 in Operation Shire, as to the intended plan for</p> <p>11 an interception or an intervention?</p> <p>12 A. Not really, sir, no.</p> <p>13 Q. No?</p> <p>14 A. Not that I can remember, sir, no.</p> <p>15 Q. Do you remember PowerPoint presentations and briefings</p> <p>16 where it said, "We are going to conduct a two-vehicle</p> <p>17 strike, or a three-vehicle strike, this is the way that</p> <p>18 we are going to do it"?</p> <p>19 A. You can't really make those plans on a MASTS operation,</p> <p>20 it is so fluid and flexible. You make up the plans or</p> <p>21 the decision is made nearer the time. It may be</p> <p>22 a two-vehicle strike, it may be a three-vehicle strike.</p> <p>23 It is too flexible and fluid to make dramatic statements</p> <p>24 like that on the briefing.</p> <p>25 Q. If you just go back to tab 21, please, which is</p> <p style="text-align: center;">Page 34</p>	<p>1 conduct an interception prior to any offence taking</p> <p>2 place."</p> <p>3 Which is before we get to Culcheth, yes?</p> <p>4 A. Yes, sir.</p> <p>5 Q. You see there Mr Lawler was I think setting out what the</p> <p>6 intention of the operation was, not just to safeguard</p> <p>7 members of the public --</p> <p>8 A. Yes.</p> <p>9 Q. -- to actually say what you are going to do. Was that</p> <p>10 more normal or less normal?</p> <p>11 A. You sometimes get that level of intent on briefings.</p> <p>12 For example, I would assume they have intelligence to</p> <p>13 suggest that they didn't want the car to get to</p> <p>14 Culcheth. We have had operations where individuals are</p> <p>15 not allowed to get to a certain address because we know</p> <p>16 they are going to cause harm. So you will be told that,</p> <p>17 "Under no circumstances will that car or that subject</p> <p>18 arrive at the premises".</p> <p>19 So if he has intelligence to suggest that, that is</p> <p>20 why it would be in the briefing.</p> <p>21 Q. Okay, to take a different example, later on, I think</p> <p>22 this is X7 speaking at 1182, please.</p> <p>23 A. Yes, sir.</p> <p>24 Q. The last paragraph on that page, he says:</p> <p>25 "We will go on to direct contacts now ..."</p> <p style="text-align: center;">Page 36</p>

<p>1 A. Yes, sir. 2 Q. "... where the subjects have been seen. This is the 3 area where the subjects have been conducting their 4 recesses, they have been parking their vehicle here and it 5 appears they have been observing this area here. This 6 is Sainsbury's, this whole building here is Sainsbury's, 7 these are individual offices, we have got various 8 businesses within this, this L shape here. Here is 9 a secure yard, you have got a secure gate there which is 10 padlocked, a secure gate there which is padlocked and 11 then this fence line here, there is a fence. It appears 12 they have been parking there, a bush line, should have 13 said there is a fence, they have been -- it looks like 14 they have been observing this car park in the secure 15 area here. Quite why we don't know. And what access 16 they can gain to this building it is unclear. 17 "What I do know is this part here is a loading bay 18 for Sainsbury's, so when they have conducted recesses in 19 the past we know they have emerged, one of the subjects 20 emerged from this bush line here with a hacksaw so 21 whether they have been effecting an entry through the 22 fence then or prepping to see what they can do or gain 23 access we don't know. 24 "But we do when a subject has come from there, 25 [I think that is 'we do know a subject has come from</p> <p style="text-align: center;">Page 37</p>	<p>1 And so it goes, on and on. 2 So quite prescriptive or detailed instructions of 3 where each car is going to go and what each team within 4 the car is going to do? 5 A. Yes, sir. 6 Q. Was that more normal or less normal? 7 A. For a direct contact, normal, sir. 8 Q. Why was that for a direct contact? 9 A. You have got a definite premises, so you have got your 10 parameters there already, so you can plan, you can plot 11 your entries, you can plot your containment positions 12 prior to anything happening. Whereas on a MASTS mobile, 13 you have not got that luxury. 14 Q. You are drawing a distinction between if a car is moving 15 and where the subjects are stationary? 16 A. Yes, sir. 17 Q. Okay. What about sort of a hybrid where they are in 18 a car but it is itself stationary, for example parked 19 up? Was firstly that the kind of situation where these 20 rather detailed instructions were given? 21 A. It depends on how quickly you were aware where they were 22 parked up, and if you have got a time to give -- 23 formulate a plan on the radio as to who is going where, 24 because it is unorthodox. 25 Q. What is unorthodox?</p> <p style="text-align: center;">Page 39</p>
<p>1 there'] so with that in mind if the subjects are seen 2 going into this premises or into this area we go to 3 Amber, we obviously get authority for the strike. This 4 is the likely area of where we will be coming to. 5 Obviously we will all be in convoy. As we come up here, 6 alpha and bravo will continue. Whisky 4, we have 7 obviously been down there and had a look. We will hang 8 a left we will continue past where this is, this fence 9 line here and this gate here, we will hang a left and we 10 will come to a halt on this bush line here. Here is 11 a no entry but we will just obviously ignore. It is 12 a very quiet road anyway, we are going to do a cut-off 13 there. 14 "Bravo uniform 2, you follow us and obviously you 15 will park up on that gate there, you will put 16 a containment on there, charlie, H9, obviously you have 17 been down there as well. As we come to this here 18 Sainsbury's you are going to hang a left, you are going 19 to come to a halt on that gate there and you are going 20 to deploy there. So we have got this area and this 21 compound, Delta at November 7 when you hear Hotel 9 turn 22 left here at Sainsbury's you are going to stop there. 23 Blank and V3 are going to alight there, one is going to 24 remain. The other is going to come a little further 25 round maintaining line of sight ..."</p> <p style="text-align: center;">Page 38</p>	<p>1 A. Doing any strike within -- not on a road, basically. 2 Q. Unorthodox meaning -- I think I understand what you 3 mean, it is not the preferred option? 4 A. It is not the recognised tactic -- 5 Q. No. 6 A. -- otherwise on the road. 7 Q. To what extent had it been practised, not in 8 Operation Shire but by you previously, that this 9 unorthodox tactic? 10 A. It is always practised in training, as part of 11 scenarios. 12 Q. We have seen some PowerPoints from a previous MASTS 13 operation, we have looked at one of them and there are 14 some more. Is it recognised to be generally unorthodox? 15 A. Yes. 16 Q. What is the problem with it then? 17 A. There is no real structure as to positioning of our 18 vehicles, it all depends on where the vehicle is in the 19 car park, what vehicles are near the subject vehicle, 20 what space we have, and all those other considerations. 21 Q. That is why, if you can avoid doing it, you would prefer 22 to do it on a vehicle that is mobile? 23 A. "Mobile" is the wrong word. We will still carry out 24 a strike when the vehicle is stationary but on the road, 25 is the preferred option, if is that what you are getting</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 at, yes.</p> <p>2 Q. A vehicle on a road that had been moving and/or intended</p> <p>3 to move and you prevent it from doing so?</p> <p>4 A. But then again, on the flipside to that, if a vehicle is</p> <p>5 stationary in a car park and the car park is quiet, it</p> <p>6 is more safe for the general public to carry out the</p> <p>7 strike on that car park.</p> <p>8 Q. Exactly so. You are saying that there are -- I think it</p> <p>9 is recognised to be unorthodox, because quite often the</p> <p>10 variables associated with it are quite numerous, about</p> <p>11 who is going to be on the car park, the positioning of</p> <p>12 the subject vehicle, what physical objects are going to</p> <p>13 be in proximity to it, whether other cars are going to</p> <p>14 be parked close to it?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Is that right?</p> <p>17 A. Yes, sir.</p> <p>18 Q. But it is something that had been trained for?</p> <p>19 A. Constantly, sir, yes.</p> <p>20 Q. To what extent, if it was known that subjects' recess</p> <p>21 had consisted of parking up in a car park, indeed the</p> <p>22 same car park, to carry out what was assessed to be</p> <p>23 reconnaissance of a potential target, would you have</p> <p>24 expected to be provided with information as to the</p> <p>25 nature of the car park?</p> <p style="text-align: center;">Page 41</p>	<p>1 MR BEER: Sir, I don't know whether that is a convenient</p> <p>2 moment?</p> <p>3 THE CHAIRMAN: Yes, certainly, if it suits your plan of</p> <p>4 questioning, certainly.</p> <p>5 MR BEER: Thank you, sir.</p> <p>6 THE CHAIRMAN: We will take a break at this stage.</p> <p>7 Mrs Shaw, how are we going to deal with this.</p> <p>8 THE USHER: I will just take the witness off the bench.</p> <p>9 THE CHAIRMAN: Thank you very much.</p> <p>10 I am tempted to say 3.25, just to allow a little bit</p> <p>11 of time for moving the witness around, but if you think</p> <p>12 that is too long --</p> <p>13 MR BEER: Thank you, sir.</p> <p>14 (3.18 pm)</p> <p>15 (A short adjournment)</p> <p>16 (3.25 pm)</p> <p>17 THE CHAIRMAN: Mrs Shaw is just fetching the witness.</p> <p>18 (Pause)</p> <p>19 Before we carry on, U9, I have not invited you to</p> <p>20 sit down and the reason for that is I suspect that if</p> <p>21 you were to do so you would become invisible to half the</p> <p>22 people who are entitled so you would certainly become</p> <p>23 inaudible. I hope you don't mind?</p> <p>24 A. Not at all, sir.</p> <p>25 THE CHAIRMAN: If you do get uncomfortable let me know and</p> <p style="text-align: center;">Page 43</p>
<p>1 A. The commanders would definitely know. Whether that</p> <p>2 would be passed down to us, it would be but maybe not</p> <p>3 straight away.</p> <p>4 Q. Here we know that you were laid up at Leigh police</p> <p>5 station for hours on end --</p> <p>6 A. Yes, sir.</p> <p>7 Q. -- I think, you know, 12 hours or so.</p> <p>8 Was there space there to conduct any rehearsals of</p> <p>9 a strike?</p> <p>10 A. Not in Leigh police station, sir, no.</p> <p>11 Q. It is quite a small location?</p> <p>12 A. It is, sir. The car park was full.</p> <p>13 Q. In operations generally was it usual after the</p> <p>14 briefing -- assuming that time allowed, ie it was not</p> <p>15 time critical, was it usual to conduct a rehearsal of</p> <p>16 one or more of the tactical options that it was intended</p> <p>17 to use that day?</p> <p>18 A. If possible, sir, yes.</p> <p>19 Q. On this occasion I think that didn't occur, was that</p> <p>20 just because, to your knowledge, you were at Leigh</p> <p>21 police station and it couldn't occur?</p> <p>22 A. I am not too sure, sir, I can't remember.</p> <p>23 Q. Okay.</p> <p>24 Do you remember doing rehearsals that day or not?</p> <p>25 A. I can't, sir, no.</p> <p style="text-align: center;">Page 42</p>	<p>1 I will either give you a break or we will see if we can</p> <p>2 manage to seat you in a way which enables people to see</p> <p>3 you, those who are entitled to do so.</p> <p>4 A. I am fine, sir.</p> <p>5 MR BEER: U9, I think after the briefing had ended you went</p> <p>6 to Leigh police station and you stayed there until about</p> <p>7 6.15 when State Green was declared and you headed off to</p> <p>8 the general area of Culcheth.</p> <p>9 A. That's right, sir, yes.</p> <p>10 Q. About 12 hours or so there?</p> <p>11 A. Yes, sir.</p> <p>12 Q. What did you do in the 12 hours?</p> <p>13 A. Watched TV, read a book, generally relaxed.</p> <p>14 Q. Was that fairly normal, that there would be protracted</p> <p>15 periods of being laid up somewhere?</p> <p>16 A. Yes, it was, sir, yes.</p> <p>17 Q. Was that at all an unusual period of time to have to</p> <p>18 wait before the call for actual deployment came?</p> <p>19 A. Not really, sir, no.</p> <p>20 Q. It may be hard for you to say, but what if any impact</p> <p>21 did that have on your operational readiness?</p> <p>22 A. None at all, sir. We were used to doing things like</p> <p>23 that.</p> <p>24 Q. In that 12 hours, were there any intelligence updates</p> <p>25 given to you?</p> <p style="text-align: center;">Page 44</p>

<p>1 A. Probably, but I can't say for certain, sir.</p> <p>2 Q. In your four witness statements, concerned with this,</p> <p>3 I don't think we have a record of any such intelligence</p> <p>4 updates, anything less formal discussed amongst the AFOs</p> <p>5 that you can now recall?</p> <p>6 A. I can't recall anything, but if there was anything</p> <p>7 major, the OFC normally just comes in and says, "Just to</p> <p>8 make you aware ..." And then that is it.</p> <p>9 Q. I was thinking more not a formal dissemination,</p> <p>10 effectively, by the OFC, but the OFCs chatting amongst</p> <p>11 themselves about these subjects.</p> <p>12 A. Sometimes, sir, yes, and sometimes it feeds down to us</p> <p>13 and sometimes it doesn't.</p> <p>14 Q. I am not talking about it feeding down. Feeding</p> <p>15 amongst, ie, "Oh I know Totton, from X" or, "I know</p> <p>16 Grainger from Y".</p> <p>17 A. Not on that day, sir, no.</p> <p>18 Q. Can we turn then to the events of the evening, please.</p> <p>19 You have made four witness statements about those,</p> <p>20 two of them are relatively perfunctory but I just want</p> <p>21 to establish that the circumstances in which you made</p> <p>22 each of the accounts, please, or the main account.</p> <p>23 Can we look at your bundle at tab 1, please. You</p> <p>24 can probably put away the general firearms officer</p> <p>25 bundle.</p> <p style="text-align: center;">Page 45</p>	<p>1 8 March 2012 ..."</p> <p>2 A. Yes, sir.</p> <p>3 Q. Is that a mistake or are we missing a statement?</p> <p>4 A. I think it must have been a mistake, sir, on my part.</p> <p>5 Q. That is a reference back to the statement of the 7th?</p> <p>6 A. I think so, yes.</p> <p>7 Q. Good. Can you recall the circumstances in which you</p> <p>8 came to make this statement of 9 March 2012?</p> <p>9 A. From memory, I believe we went to a separate building.</p> <p>10 Q. Nexus House?</p> <p>11 A. Nexus House, yes.</p> <p>12 Q. Yes.</p> <p>13 A. And did the statement there, in a large room.</p> <p>14 Q. In a large room?</p> <p>15 A. Yes.</p> <p>16 Q. Were there a number of the AFOs present in that room?</p> <p>17 A. I think everyone that was involved in the operation was</p> <p>18 present, sir, yes.</p> <p>19 Q. Did that include Q9?</p> <p>20 A. I can't remember, sir.</p> <p>21 Q. How did it come about that you all ended up in a room in</p> <p>22 Nexus House making witness statements?</p> <p>23 A. A phone call at home asking us to come in --</p> <p>24 Q. Okay.</p> <p>25 A. -- and a statement is required and we are doing it at</p> <p style="text-align: center;">Page 47</p>
<p>1 Look at your bundle, tab 1. I think this is your</p> <p>2 first written account; is that right? 7 March, so four</p> <p>3 days later?</p> <p>4 A. Yes, it appears to be.</p> <p>5 Q. Correct me if I am wrong, but from the content this</p> <p>6 looks like it is a statement made not to record what you</p> <p>7 did on the operation, but more for the purposes of</p> <p>8 a criminal investigation or prosecution of the subjects?</p> <p>9 A. Yes --</p> <p>10 Q. Ie explaining your arrest and caution?</p> <p>11 A. I think it is just classed as a duty statement for what</p> <p>12 we did that day.</p> <p>13 Q. That is slightly different, or it might be slightly</p> <p>14 different, to how some officers refer to a duty</p> <p>15 statement, which is just when I came on/when I went off</p> <p>16 and a very brief statement as to what I did. This looks</p> <p>17 more to be focused on the fact that you had arrested</p> <p>18 Joseph Travers and the caution that you gave him and he</p> <p>19 made no reply?</p> <p>20 A. It could have been because of the prosecution, sir, yes.</p> <p>21 Q. Thank you. Is the first account of what happened the</p> <p>22 next tab, tab 2, on 9 March 2012. Do you have that?</p> <p>23 A. Yes, the big statement, sir, yes.</p> <p>24 Q. Yes, the big statement, that's right. Do you see in the</p> <p>25 second paragraph it says, "Further to my statement dated</p> <p style="text-align: center;">Page 46</p>	<p>1 Nexus House.</p> <p>2 Q. All right. I think you made this statement as part of</p> <p>3 sort of a collective enterprise, is that right? Ie in</p> <p>4 the presence of your colleagues and sharing some</p> <p>5 information between you?</p> <p>6 A. Some facts/information, yes.</p> <p>7 Q. They may or may not be facts but you tell us what pieces</p> <p>8 of information you shared?</p> <p>9 A. There was a board put up within the classroom, or within</p> <p>10 the room itself, stating facts like time, date, vehicle</p> <p>11 registration numbers, street names, et cetera. The</p> <p>12 facts that we had to make sure were the same.</p> <p>13 Q. Who said that you had to make sure they were the same?</p> <p>14 A. Well, that was just my interpretation of what was</p> <p>15 happening.</p> <p>16 Q. I don't know whether it is on the -- thank you, the</p> <p>17 bundle, if you just take this one that will be easier</p> <p>18 than getting that out. Thank you.</p> <p>19 (Handed)</p> <p>20 A. Thank you.</p> <p>21 Q. Mrs Curran has some flip charts. Were they put up on</p> <p>22 a large whiteboard?</p> <p>23 A. They were, sir, yes.</p> <p>24 Q. We have taken photographs of them and effectively copied</p> <p>25 them, and reduced them, I am not going to go through the</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 pantomime of getting them out but they were very big 2 sort of A1 -- 3 A. Large, sir, yes. 4 Q. Large, yes. Do you know who wrote them? 5 A. Off the top of my head, sir, no, I can't remember. 6 Q. Were they there ready for you? Or did somebody go first 7 and say, "Well, my recollection is this", and then 8 somebody wrote them up and then everyone else copied 9 them? 10 A. I can't remember, sir, sorry. 11 Q. Okay. 12 If we just, I don't know whether you have them to 13 hand, sir, have you? 14 THE CHAIRMAN: No, I haven't. Do I actually need them at 15 this stage? 16 MR BEER: I think, yes, please, sir. 17 THE CHAIRMAN: The witness is going to need a copy. 18 MR BEER: The witness needs them. 19 THE CHAIRMAN: Yes. (Pause) 20 (Handed) 21 Thank you. 22 MR BEER: Thank you very much, Ms Cartwright. 23 If we have those open, those three pages, alongside 24 your statement, we can just see some points of sameness 25 and difference between them:</p> <p style="text-align: center;">Page 49</p>	<p>1 06.00 hours you took part in a briefing. Do think you 2 obtained that from this flip chart? 3 A. Again, sir, quite possibly, yes. 4 Q. We can see that towards the end of that paragraph you, 5 as the chairman rightly says, say you were armed with 6 a 9-millimetre self-loading pistol, a Heckler & Koch 7 carbine and a Taser. That is talking about I think when 8 you went to Leigh police station; is that right? 9 A. That's correct, sir, yes. 10 Q. On the flip chart it says: 11 "Teams to Leigh police station rest period." 12 You have written in your statement: 13 "Whilst at Leigh police station we used that time as 14 a refreshment and rest period." 15 I think you would have remembered that without being 16 told, wouldn't you? 17 A. That's correct, sir, yes. 18 Q. The next entry on the flip chart is, "18.15, leave Leigh 19 police station, Green". 20 You put in your statement: 21 "Later on in the afternoon, approximately 18.15, we 22 became mobile, State Green." 23 Do you think you took the time of going to State 24 Green from the flip chart? 25 A. I would say so, yes.</p> <p style="text-align: center;">Page 51</p>
<p>1 "Tour of duty, 04.30 hours, 3/3/12." 2 I think your statement says: 3 "Further to my statement dated 8 March, at 4 04.30 hours I commenced duty at the TFU." 5 A. That's correct, sir, yes. 6 Q. Do you think you would have obtained that information 7 from here? 8 A. Quite possibly, sir, yes. 9 Q. Yes. "77/12" I think is the reference to the firearms 10 authority which I think you don't include, "Weapons 11 issued", I don't think that is there in your statement, 12 and then approximately -- 13 THE CHAIRMAN: Sorry. Well, I think it is -- I may be 14 misunderstanding the point of your question, but I think 15 it is, isn't it? It is about from the bottom of the 16 first page. 17 MR BEER: Yes, in terms of him being armed -- 18 THE CHAIRMAN: Yes. 19 MR BEER: -- but in the sequence of events. 20 THE CHAIRMAN: I see, right. 21 MR BEER: I was talking about on the right-hand side of the 22 flip chart it says, "Approximately 06.00 hours ..." 23 THE CHAIRMAN: I see, yes. 24 MR BEER: "... to 06.15." 25 Can we see that you have said at approximately</p> <p style="text-align: center;">Page 50</p>	<p>1 Q. Thank you. 2 Somebody has written: 3 "On Raven Inn, Warrington Road, junction with 4 Hey Shot Lane." 5 I don't think that is in your witness statement. 6 A. No, sir, it isn't. 7 Q. Do you know why you would be leaving that out when you 8 had been told it? 9 A. I don't even know what it refers to, sir, to be honest. 10 Q. No. I think it was an intermediate stopping point after 11 you started to make towards Culcheth, you laid up -- 12 A. We did, sir, yes. 13 Q. -- for a short while at a pub called the Raven Inn. 14 Yes. 15 Then over the page at your witness statement at 139, 16 you say: 17 "As a result of information, we attended the 18 Jackson Avenue area of Culcheth. As we approached that 19 area we were put on condition Amber. We were informed 20 via our personal radios that the subject vehicle was in 21 a car park just off Jackson Avenue, the time was now 22 approximately 19.05 hours." 23 On the flip chart it has that as 19.08, do you know 24 why you sort of broke from protocol -- 25 A. I couldn't tell you, sir, no.</p> <p style="text-align: center;">Page 52</p>

<p>1 THE CHAIRMAN: Was this statement originally made in 2 handwritten or typed form? 3 A. I think it was actually typed, sir. 4 THE CHAIRMAN: Okay. 5 MR BEER: You don't know why you -- 6 A. I couldn't tell you, sir, no. 7 Q. By six days later, would you have been able to remember 8 that Amber was declared at 7.05 rather than 7.08? 9 A. No, sir. 10 Q. I don't think you had any notes at that time, did you? 11 A. No, sir. 12 Q. Then I think your statement continues setting out really 13 what happened. You don't actually I think recall the 14 moment that you went to State Red in the statement, do 15 you? 16 A. No, sir. 17 Q. On the second page of the flip chart there is a record 18 of the vehicle registration number, which I think you 19 have written down at the top of page 2 of your witness 20 statement. 21 A. Yes, sir. 22 Q. Which ironically enough is the wrong one, I think you 23 know. 24 A. Yes, sir. 25 Q. You don't have any recollection as to who was taking the</p> <p style="text-align: center;">Page 53</p>	<p>1 A. Yes, sir. 2 Q. Was the same process adopted by -- was it in GMP? 3 A. It wasn't, sir, no. It was in Lancashire. 4 Q. You were attached to Lancashire police then were you? 5 A. No, sir, we travelled to Lancashire. 6 Q. But it was a GMP incident, you were a GMP officer? 7 A. Yes, sir. 8 Q. This was long after a post-incident procedure had taken 9 place, so not on the night? 10 A. Yes, sir. 11 Q. This was six days later. Was that the same in the other 12 case as well, that everyone had got together and made 13 their statements at the same time in the same room? 14 A. I don't think it was, sir, no. 15 Q. Did anyone explain to you why it was being done like 16 this? 17 A. I think someone mentioned about collusion or something 18 to try and stop any form of that. 19 Q. Right. 20 A. I think. 21 Q. What, putting people together in the room and putting up 22 on a whiteboard what they should say was not seen as 23 collusion? 24 A. Just so the facts are exactly the same, because they 25 were that facts.</p> <p style="text-align: center;">Page 55</p>
<p>1 lead on the flip chart? 2 A. I can't remember, sir, no. 3 Q. Then the third page of the flip chart says: 4 "I made this statement at Nexus House on 9 March, 5 commencing at 13.15 hours in the presence of my 6 colleagues. During the making of this statement I from 7 time to time clarified with my colleagues matters 8 relating to times, vehicles, locations and suspect 9 details." 10 Which is described, I think, as the "conferral form 11 of words". 12 Do you know who drew up the conferral form of words? 13 A. I can't remember the name, sir, but I think there was 14 a legal representative there. 15 Q. A legal representative from the federation? 16 A. I can't remember, sir. 17 Q. We can see you have repeated that, apart from writing 18 "subject" rather than "suspect", at the third page of 19 your witness statement, at the end? 20 A. Yes, sir. 21 Q. Yes? 22 Was this a usual way of doing things? 23 A. Only for an incident such as this. 24 Q. Had you been involved in incidents such as this, where 25 somebody had been shot previously then?</p> <p style="text-align: center;">Page 54</p>	<p>1 Q. Okay, what is your recollection now of what happened 2 when State Amber was called? 3 A. I think State Amber was called just prior to turning on 4 to, from the public house stop off point. 5 Q. The Raven Inn? 6 A. I think so, sir, yes, from memory. And it is just 7 prepping yourself, prepping your kit and equipment, we 8 had a rough idea where the vehicle was in relation to 9 where we were at that time. 10 Q. Okay. 11 A. And it was just getting yourself ready for a potential 12 strike. 13 Q. At that time could you hear in the vehicle the 14 broadcasts of the surveillance officers? 15 A. Yes, sir. 16 Q. Was that on a vehicle radio or an earpiece? 17 A. Vehicle radio, sir. 18 Q. Had you heard it suggested that the vehicle had been on 19 the car park from 6.45 pm? 20 A. I can't remember the time, sir, but we knew where the 21 vehicle was, yes. 22 Q. Did you hear that there had been a loss of surveillance, 23 a loss of eyes on on the vehicle, for a period perhaps 24 of the order of 13 minutes or so? 25 A. No, sir.</p> <p style="text-align: center;">Page 56</p>

<p>1 Q. Did you hear broadcast what the OFC or TFC were saying, 2 you know, when they were making a communication via 3 radio, did that come through to you in the vehicle? 4 A. It comes through on one of our handsets, yes. 5 Q. A handset being in the vehicle? 6 A. A stand-alone -- yes. 7 Q. Did you hear them broadcast at all to the surveillance 8 team, the DSU, that there was an imperative to identify 9 whether there was anyone still in the vehicle? 10 A. I can't remember, sir. 11 Q. Did you hear any broadcast by the surveillance officers, 12 one in particular, that he had been unable to identify 13 whether there was anyone still in the vehicle? 14 A. I can't remember, sir, sorry. 15 Q. And then a broadcast from another surveillance officer 16 at about 7.05 to say that occupants were in the vehicle? 17 A. I probably did hear it, but I can't remember. 18 Q. Were you at any time told before State Amber was 19 declared that it was assessed that, or similar words, 20 that Robert Rimmer was not in the vehicle, so one of the 21 targets, subjects, in respect of whom there had been 22 a threat assessment briefed to you? 23 A. I can't remember that coming through the radio, sir, no. 24 Q. When you attended the car park, were you accordingly 25 acting on the basis that the three people you had been</p> <p style="text-align: center;">Page 57</p>	<p>1 adopt? 2 A. I can't remember on this occasion but on an orthodox 3 strike, the OFC would generally say, "Alpha car will 4 take driver's side, bravo car take passenger side", or 5 something along those lines because it is unorthodox. 6 Whether they said that this time or not I can't 7 remember. 8 Q. Was it known that the vehicle was parked in the end bay 9 and was therefore surrounded on three sides by immovable 10 objects? 11 A. I knew there was a fence line or a hedge line to the 12 driver's side and that it was in the far right-hand 13 corner, yes. 14 Q. Did you know that there was a fence at the back as well 15 and that there was a car adjacent to it? 16 A. Again, we were probably told that, sir, but I can't 17 remember exactly. 18 Q. Did you know that you were going to be going head on to 19 the cars, ie you would be broadside on to it and 20 effectively it would therefore be T-boning the alpha 21 vehicle? 22 A. Generally, yes, sir. 23 Q. What do you mean "Generally, yes"? 24 A. It is down to the drivers themselves where they position 25 the vehicles.</p> <p style="text-align: center;">Page 59</p>
<p>1 briefed up about were in the vehicle? 2 A. Yes, sir. 3 Q. At some stage you put your respirator on? 4 A. That's correct, sir, yes. 5 Q. Why did you put your respirator on? 6 A. I knew that the CS canister had been authorised and if 7 it is deployed, then you would require your respirator 8 on to function properly. 9 Q. At what point did you put your respirator on? 10 A. Just prior to exiting the vehicle. 11 Q. You were on the car park; is that right? 12 A. I would have been putting the respirator on as we turned 13 into the car park, last minute. 14 Q. Before going on to the car park, did you know the 15 position that the subject vehicle was in? 16 A. Yes, sir, I did. 17 Q. What was your understanding of where the subject 18 vehicle -- how it was positioned? 19 A. Far right corner of the car park facing outside. 20 Q. Who told you that? 21 A. I think it came over the radio systems. 22 Q. From who? 23 A. I can't remember, sir. 24 Q. Before you drove on to the car park, was there any 25 broadcast by X7 as to the roles that each of you were to</p> <p style="text-align: center;">Page 58</p>	<p>1 I would expect the first vehicle to do what the 2 first vehicle did, and block the vehicle in at the 3 front. And then it would be down to the bravo driver 4 and charlie driver where they position the cars. 5 Q. Did you know what roles those in the alpha vehicle were 6 to perform before you drove on to the car park, or as 7 you were driving on to the car park? 8 A. Not specifically. I think, as I mentioned earlier, they 9 may have been given the task of heading for the driver's 10 side and we may have been given the task of attacking 11 the passenger side but I can't remember. 12 Q. Would it be normal for there to be communication between 13 X7, the OFC, and the bravo and charlie cars to inform 14 them of what role each car was going to undertake, it 15 being an unorthodox stop? 16 A. If it was unorthodox, yes. 17 Q. But you don't remember that now? 18 A. I can't remember specifically but yes, probably did. 19 Q. When you went on to the car park, what was your current 20 understanding of what your role personally was to be? 21 A. My role was to go towards the passenger side of the 22 vehicle, depending on where our vehicle was stopped. 23 Q. But you don't know now, five years on, where you got 24 that understanding from? 25 A. No.</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 Q. That is in fact what you did, isn't it?</p> <p>2 A. It is, sir, yes.</p> <p>3 Q. Did you see the alpha vehicle travel on to the car park?</p> <p>4 A. I did, sir, yes.</p> <p>5 Q. How far behind it was the bravo vehicle?</p> <p>6 A. I would say it would have been about 10 yards --</p> <p>7 actually it wouldn't have been that far away.</p> <p>8 Q. What speed was it, alpha, doing?</p> <p>9 A. Normal road speeds.</p> <p>10 Q. That depends obviously on the speed limit of the road?</p> <p>11 A. It does, sir, yes. I mean going at a speed that would</p> <p>12 not look out of place on a car park.</p> <p>13 Q. Okay, so it was not rushed or urgent?</p> <p>14 A. No, sir, no.</p> <p>15 Q. Do you know why that is?</p> <p>16 A. Just to stop the vehicle standing out and causing any</p> <p>17 potential fleeing from the subjects.</p> <p>18 Q. Did you see the vehicle, the alpha vehicle, come to</p> <p>19 a stop?</p> <p>20 A. I didn't, sir, no.</p> <p>21 Q. Did you see whether it came into contact with the</p> <p>22 subject vehicle?</p> <p>23 A. No, sir.</p> <p>24 Q. You have described this a couple of times as</p> <p>25 an unorthodox stop, or an unorthodox intervention.</p> <p style="text-align: center;">Page 61</p>	<p>1 A. I don't think it did, sir, but I can't confirm that.</p> <p>2 Q. Your recollection is there was no bump?</p> <p>3 A. Not that I can remember feeling, sir, no.</p> <p>4 Q. What were the lighting conditions like, please?</p> <p>5 A. It was dark, there was street lights but it was still</p> <p>6 quite dark.</p> <p>7 Q. When your vehicle came to a stop, what was the first</p> <p>8 thing you did?</p> <p>9 A. I alighted from my side of the vehicle and went towards</p> <p>10 the passenger side of the red Audi.</p> <p>11 Q. What were you dressed in, please?</p> <p>12 A. A pair of jeans and a black, what we call strike jacket.</p> <p>13 Q. A strike jacket?</p> <p>14 A. Yes, a thigh-length plain black jacket with patches that</p> <p>15 can pull out.</p> <p>16 Q. Is there I think you described it as a pull out police</p> <p>17 badge on the left breast pocket?</p> <p>18 A. That's correct, sir, yes.</p> <p>19 Q. Something with Velcro, is it?</p> <p>20 A. It is tucked inside, you just pull the flap out and push</p> <p>21 it down.</p> <p>22 Q. Did you do that or not?</p> <p>23 A. Yes, sir, prior to getting out of the vehicle.</p> <p>24 Q. So you undid -- how big is the patch?</p> <p>25 A. It is about six inches wide approximately, by about</p> <p style="text-align: center;">Page 63</p>
<p>1 Is it recognised that driving in front of the</p> <p>2 subject vehicle, so that the alpha vehicle is itself</p> <p>3 T-boned, puts those in the offside at risk?</p> <p>4 A. It does, sir, yes.</p> <p>5 Q. Because the driver may be trapped --</p> <p>6 A. Yes, sir.</p> <p>7 Q. -- in his vehicle. And he or she may be directly in the</p> <p>8 line of sight of those who are believed to be</p> <p>9 potentially armed or dangerous?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Are there other ways of conducting a stop such as this?</p> <p>12 A. I suppose you could have put nose to nose, but again</p> <p>13 they would still be in the same position.</p> <p>14 It would be hard to block the vehicle in and not be</p> <p>15 in a position of potential harm.</p> <p>16 Q. Can you recall whether, given those things that you have</p> <p>17 said, there was any discussion to your knowledge of</p> <p>18 whether this was the right place to conduct the stop?</p> <p>19 A. No, sir, I can't, no.</p> <p>20 Q. Your vehicle came to a halt. How far behind the alpha</p> <p>21 vehicle was it?</p> <p>22 A. From recollection, a matter of yards.</p> <p>23 Q. A small number of yards?</p> <p>24 A. Yes, sir, yes.</p> <p>25 Q. Did your vehicle touch the alpha vehicle at all?</p> <p style="text-align: center;">Page 62</p>	<p>1 an inch high. Normal breast pocket width.</p> <p>2 Q. Like that?</p> <p>3 A. Yes, sir, about that.</p> <p>4 Q. Is that black with sort of white writing on it?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Did you have a police cap on?</p> <p>7 A. I didn't, sir, no.</p> <p>8 Q. Was that because you have got a respirator on?</p> <p>9 A. Yes, sir.</p> <p>10 Q. In your statement you don't describe shouting anything</p> <p>11 as you got out. Is that right, you didn't personally</p> <p>12 shout anything?</p> <p>13 A. I would have shouted something, yes, we always do, sir.</p> <p>14 It is a matter of normal procedure every time you do</p> <p>15 an intervention.</p> <p>16 Q. If you just look at your statement, tab 2, page 139, the</p> <p>17 second page of the statement.</p> <p>18 A. Yes, sir.</p> <p>19 Q. You say in the third paragraph, although it is not</p> <p>20 broken by a space, at the end of the second:</p> <p>21 "As we came to a stop I alighted from the vehicle</p> <p>22 and made my way towards the red Audi."</p> <p>23 You don't say there that you were shouting anything.</p> <p>24 Then:</p> <p>25 "As I approached the car on foot I could see that</p> <p style="text-align: center;">Page 64</p>

<p>1 the front passenger side was empty and knowing that 2 there were three subjects I made to the rear nearside 3 passenger door. At this point I was aware that the CS 4 canister had been deployed by X9. I then opened the 5 door and saw a male sitting inside, I identified myself 6 as a police officer and aided another officer, G9." 7 Was there any reason that you don't say in here that 8 you were shouting before you opened the door? 9 A. I can only assume it was because that is what we always 10 do and I take it as normal practice. 11 Q. You say that the front passenger side was empty. Could 12 you see where the occupant of the front passenger side 13 had gone? 14 A. I didn't, sir, no. 15 Q. Did you see any other police officers with him? 16 A. With whom, sir? 17 Q. The previous occupant of the front passenger side. 18 A. I can't remember seeing anyone, sir, no. 19 Q. How did you get from your vehicle to the nearside 20 passenger door? 21 A. Fast-paced walk. 22 Q. I wonder whether you could look, please, at tab 29 in 23 the bundle, it is the second volume. Do you have that? 24 A. Hopefully in a minute. 25 Yes. Page 23?</p> <p style="text-align: center;">Page 65</p>	<p>1 A. Yes, sir. 2 Q. Then effectively turned right, did you? 3 A. No, it was a straight line. 4 Q. It was a straight line? 5 A. Straight line from where my car was, rear offside, to 6 the centre pillar, the B pillar, of the red Audi. 7 Q. If we look, please, at tab 28, do you have 28 there? 8 A. Yes, sir. 9 Q. The first photographs on the first page and the 10 secretary page are zoomed out a little bit. On the 11 third page, which is 567, there is a picture of what we 12 are told is the cars, in roughly the positions they were 13 in on the day. Does that look accurate? 14 A. I think -- it is a diagrammatic picture? 15 Q. No, tab 28, please. 16 THE CHAIRMAN: I have that, I have diagrams. 17 A. Diagrams, yes. 18 MR BEER: Something has gone very wrong then. Tab 28 in my 19 version is a series of pictures like that. 20 THE CHAIRMAN: It may be worth looking at 27, I don't know 21 whether that is possibly the section -- we certainly 22 have some photographs in 27, including towards the end 23 of 27, some photographs which appear to show -- yes. 24 Yes. 25 MR BEER: If you can take out of 27 then the photographs</p> <p style="text-align: center;">Page 67</p>
<p>1 Q. Tab 29 -- I am so sorry, it is the general bundle. 2 General bundle, firearms officers, tab 29. 3 A. Yes. 4 Q. Can you see a diagrammatic depiction of the red Audi on 5 the car park? 6 A. Yes, yes. 7 Q. The alpha vehicle shown in blue, the bravo vehicle shown 8 in blue and the charlie vehicle shown in light blue? 9 A. Yes, sir. 10 Q. Does that look fairly accurate to you, the way that you 11 each stopped? 12 A. From our vehicle, yes. 13 Q. If you go forwards two pages to 586 in the top right, 14 you can see a close up of that. 15 A. Yes, sir. 16 Q. Describe where from the bravo vehicle, the second blue 17 vehicle, you came and describe where you went, please? 18 A. I alighted from the rear offside and made my way to the 19 rear nearside of the red Audi. 20 Q. Did you walk down the length of your vehicle from rear 21 to front? 22 A. A straight line towards the back door, or towards the 23 doors of the Audi. 24 Q. You went past the rear offside bumper of the police 25 Audi, the alpha vehicle, yes?</p> <p style="text-align: center;">Page 66</p>	<p>1 that begin with, in the top right, 575 and end with 583 2 and put them in 28, please. 3 THE CHAIRMAN: Yes. (Pause) 4 MR BEER: Thank you. 5 Looking at 567 then. 6 A. Yes, sir. 7 Q. Is that a closeup, two closeups effectively? 8 A. Yes, it is, sir, yes. 9 Q. You got out of the offside rear seat of the S-Max, 10 I think it is -- 11 A. Yes, sir. 12 Q. -- and walked at a brisk pace, did you say? 13 A. Yes, sir. 14 Q. To the rear nearside seat in a direct line, yes? 15 A. Towards the B pillar of the red Audi, yes, sir. 16 Q. When you approached the car, could you tell if the 17 engine was running? 18 A. I couldn't, sir, no. 19 Q. Was there anything to suggest that it was? 20 A. Not that I could see, sir, no. 21 Q. Is the car moving backwards and forwards? 22 A. No, sir, it wasn't. 23 Q. Or revving sounds, exhaust fumes or wheels attempting to 24 turn? 25 A. Not that I can remember seeing, sir, no.</p> <p style="text-align: center;">Page 68</p>

1 Q. Were the exterior lights of the Audi on?
 2 **A. Again I can't remember, sir.**
 3 Q. When you got out of your vehicle, were you the first
 4 out?
 5 **A. From my side of the vehicle, yes, sir.**
 6 Q. What about not on your side of the vehicle?
 7 **A. They alighted all at the same time; as soon as our**
 8 **vehicle stopped all three officers alighted.**
 9 Q. Where did your colleagues each go, could you see?
 10 **A. I couldn't, sir, no. Not at that point.**
 11 Q. You couldn't see -- presumably you could see but you
 12 were not paying particular attention to what they were
 13 doing, you were focused on getting to the B pillar?
 14 **A. No, I couldn't see them they were on the opposite side**
 15 **of our car.**
 16 Q. You didn't see he them emerge from round the other side
 17 of the S-Max?
 18 **A. No, sir.**
 19 Q. When you reached the B pillar, what did do?
 20 **A. I waited on further support from one of my colleagues.**
 21 Q. Did you say "both my colleagues"?
 22 **A. Further colleagues.**
 23 Q. Further colleagues?
 24 **A. Anyone to be honest.**
 25 Q. Did you have a weapon drawn at this time?

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1 **A. I did, sir, yes.**
 2 Q. Which weapon was it?
 3 **A. It was the MP5 on aim.**
 4 Q. "On aim", tell the chairman what "on aim" means.
 5 **A. Pointing the weapon as the vehicle as I approached.**
 6 Q. Does it have any sights on it?
 7 **A. It does, sir, yes.**
 8 Q. Describe to the chairman the sights that were in use?
 9 **A. It is just what they call a red dot sight in general**
 10 **terms. You look through the aperture and a red dot is**
 11 **superimposed on the centre point of where you were**
 12 **aiming.**
 13 Q. Is the red dot visible to anyone other than the operator
 14 of the weapon?
 15 **A. No, sir.**
 16 Q. Does it display a strobe at all, I mean other than --
 17 you said no to the subject or object being able to see
 18 the red dot, does it display a strobe at all, whether
 19 red or otherwise?
 20 **A. The sight? No, sir.**
 21 Q. Does anything else display a colour?
 22 **A. If there was a laser attached to the weapon system, then**
 23 **yes it would be a green strobe.**
 24 Q. Did you have a laser attached?
 25 **A. I honestly can't remember.**

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1 Q. In what circumstances would you?
 2 **A. Sorry?**
 3 Q. Why would you enable the laser?
 4 **A. It is just an aid in aiming. For quick shots.**
 5 Q. What is the difference between the red dot and the green
 6 laser?
 7 **A. The green laser would be predominantly used for taking**
 8 **shots when you are not actually properly on aim.**
 9 **Because the subjects came at you very quickly and also**
 10 **aids to identify subjects at distance to other AFOs.**
 11 Q. Did you have a light on the weapon? A torch or a TAC
 12 light?
 13 **A. Yes, there was, sir, yes.**
 14 Q. Was the light on?
 15 **A. I think it would have been, sir, yes.**
 16 Q. What, if anything, did you see through the rear of the
 17 vehicle?
 18 **A. Nothing, sir. I think there was tinted windows.**
 19 Q. Had you been told before this time that the Audi down
 20 both sides, and in fact the rear window, had heavily
 21 tinted windows?
 22 **A. We would have been told, sir, yes.**
 23 Q. Not would have been, that is actually the issue?
 24 **A. I can't remember but I would say every time I have came**
 25 **up against a vehicle that has tinted windows it is of**

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1 **significant importance to the AFOs and the surveillance**
 2 **officers do tell you that there is tinted windows.**
 3 Q. Why is it significant information for the AFOs?
 4 **A. Lack of visibility for us, we can't see what they are**
 5 **doing, et cetera, so therefore it is a higher risk.**
 6 Q. They can see what you are doing?
 7 **A. That's correct, yes.**
 8 Q. Or some of it, and you are, until you get the car
 9 open --
 10 **A. Un sighted.**
 11 Q. Sorry?
 12 **A. Un sighted.**
 13 Q. Yes.
 14 I think it is fair to say in your statement you
 15 don't record having been told that?
 16 **A. No.**
 17 Q. As far as I have seen, I don't think other AFOs say that
 18 they knew that either. It is something that you can go
 19 as far as saying that you would like to have thought you
 20 had been told?
 21 **A. I thought I was told, yes.**
 22 Q. Sorry?
 23 **A. I would say we would have been told, but I can't**
 24 **remember specifically being told that night. But we**
 25 **usually are.**

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<p>1 Q. Okay.</p> <p>2 You are on aim, by the rear nearside door of the</p> <p>3 vehicle?</p> <p>4 A. Yes, sir.</p> <p>5 Q. What happened when you got there?</p> <p>6 A. Very quickly I heard the window smash.</p> <p>7 Q. Which window?</p> <p>8 A. I think it was the front passenger seat. The one to my</p> <p>9 left-hand side, I think. And I believe the CS canister</p> <p>10 was then deployed.</p> <p>11 Q. You have told us already that the front passenger seat</p> <p>12 was empty. Was the door open?</p> <p>13 A. I don't think it was, sir, no.</p> <p>14 Q. Was the window down?</p> <p>15 A. No, sir.</p> <p>16 Q. How did you see into it?</p> <p>17 A. The front window was not tinted.</p> <p>18 Q. If you took at the photographs at tab 567 --</p> <p>19 A. Yes, sir.</p> <p>20 Q. -- I think if you made directly from the rear offside of</p> <p>21 the S-Max to the B pillar on the nearside of the Audi,</p> <p>22 that may not have allowed you a very good view into the</p> <p>23 front windscreen?</p> <p>24 A. It is front side window.</p> <p>25 Q. Sorry?</p> <p style="text-align: center;">Page 73</p>	<p>1 A. Yes, the clear one, yes.</p> <p>2 Q. Were you there before the window was broken, ie were you</p> <p>3 in position?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Who broke the window?</p> <p>6 A. I couldn't tell you offhand, sir.</p> <p>7 Q. You say in your statement, just to help you, tab 2,</p> <p>8 page 139, are you there, second page?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Third paragraph, between the hole-punches:</p> <p>11 "As I approached the car on foot I could see that</p> <p>12 the front passenger side was empty and knowing that</p> <p>13 there were three subjects I made to the rear nearside</p> <p>14 passenger door. At this point I was aware that the CS</p> <p>15 canister had been deployed by X9."</p> <p>16 So I think certainly back then you knew it was X9.</p> <p>17 A. Yes, I was assuming he was the officer that had the role</p> <p>18 of shotgun, sorry CS dispersal.</p> <p>19 Q. How did he break the window?</p> <p>20 A. At that specific time I am not sure, but we do have</p> <p>21 issued window breakers.</p> <p>22 Q. Have you ever performed the role of CSDC dispersal man?</p> <p>23 A. I have, sir, yes.</p> <p>24 Q. Do you hold the window breaker in one hand and the CSDC</p> <p>25 in the other?</p> <p style="text-align: center;">Page 75</p>
<p>1 A. Front passenger side window.</p> <p>2 Q. You mean the quarterlight?</p> <p>3 A. No, the actual passenger window, not the quarterlight.</p> <p>4 Q. Was that open then?</p> <p>5 A. I don't think so, sir, no.</p> <p>6 Q. Well it was tinted, wasn't it?</p> <p>7 A. No the rear one was tinted, the front one wasn't.</p> <p>8 Q. You are saying the front one was not tinted at all?</p> <p>9 A. Not that I can remember, sir, no.</p> <p>10 Q. You could see through the clear glass that there was no</p> <p>11 passenger in the seat?</p> <p>12 A. Yes, sir.</p> <p>13 Q. What did you do when you got to the rear door then?</p> <p>14 A. After a short period, I knew, I was aware, that I had</p> <p>15 one of my fellow AFOs by my side.</p> <p>16 Q. Was that G11?</p> <p>17 A. Yes, sir.</p> <p>18 I then opened the door and that is when I came</p> <p>19 across the subject, Travers.</p> <p>20 Q. Before G11 arrived, I think you told us that you heard</p> <p>21 a window break?</p> <p>22 A. I think it was a window, sir, yes.</p> <p>23 Q. Which window was that?</p> <p>24 A. The front nearside passenger. The one that I could --</p> <p>25 Q. The clear one that you had seen through?</p> <p style="text-align: center;">Page 74</p>	<p>1 A. Yes, sir.</p> <p>2 Q. Does that mean that you don't have a weapon to hand?</p> <p>3 You don't have a weapon in your hand?</p> <p>4 A. No, but I have other officers in front of me dealing</p> <p>5 with the vehicle.</p> <p>6 Q. Is that the way that it should be done then, that other</p> <p>7 officers go in front of the dispersal man?</p> <p>8 A. Yes, sir.</p> <p>9 Q. In this case, who were the officers or officer in front</p> <p>10 of the dispersal man?</p> <p>11 A. That would have been myself, sir, first from the bravo</p> <p>12 vehicle.</p> <p>13 Q. Did you know that you were performing that role? Ie you</p> <p>14 were a person with a weapon on aim, giving cover for the</p> <p>15 CSDC dispersal man, X9?</p> <p>16 A. Not specifically, no.</p> <p>17 Q. What happened when X9, as we know it is, deployed the</p> <p>18 CSDC?</p> <p>19 A. Sorry, sir, I don't understand the question.</p> <p>20 Q. What happened? Did anything happen when he deployed it</p> <p>21 in the vehicle?</p> <p>22 A. Yes, the CS device went off. From what I am led to</p> <p>23 believe and that would have been about the same time as</p> <p>24 myself and G11 aided Travers out of the vehicle.</p> <p>25 Q. At the point that the CSDC was deployed, I think from</p> <p style="text-align: center;">Page 76</p>

<p>1 the evidence you have given the vehicle wasn't moving?</p> <p>2 A. No, sir.</p> <p>3 Q. And it was not revving or there were no obvious signs of</p> <p>4 it being on?</p> <p>5 A. Not that I can remember, sir, no.</p> <p>6 Q. By reference to what was happening, could you see any</p> <p>7 particular reason for the deployment of the CSDC?</p> <p>8 A. At that time I was concentrating on Travers, so no.</p> <p>9 Q. Before the CSDC was deployed, did you hear the report of</p> <p>10 a weapon?</p> <p>11 A. I can vaguely remember hearing two shotgun rounds go</p> <p>12 off, but that is it, sir.</p> <p>13 Q. I think that was later.</p> <p>14 A. Yes, sir.</p> <p>15 Q. I appreciate we are examining a small number of seconds</p> <p>16 here, but in your statement you describe the two large</p> <p>17 reports that you thought was a shotgun --</p> <p>18 A. Yes, sir.</p> <p>19 Q. -- being discharged twice. As after you had got hold of</p> <p>20 Travers.</p> <p>21 A. Yes, sir.</p> <p>22 Q. I am talking about before the window was broken?</p> <p>23 A. No, sir, I didn't hear anything.</p> <p>24 Q. You didn't hear any shots fired?</p> <p>25 A. No, sir.</p> <p style="text-align: center;">Page 77</p>	<p>1 A. Cowering, yes, just sort of an instant cower and then we</p> <p>2 took him out of the car.</p> <p>3 Q. Was that you and G11 that took him out?</p> <p>4 A. Yes, sir.</p> <p>5 Q. What did you do with him?</p> <p>6 A. Helped secure the prisoner, and --</p> <p>7 Q. What does that mean?</p> <p>8 A. Put the handcuffs on him.</p> <p>9 Q. Where did you do that? In a standing position or did</p> <p>10 you take him to the ground?</p> <p>11 A. No, he was on the ground.</p> <p>12 Q. And front or back?</p> <p>13 A. It would have been front, sir.</p> <p>14 Q. Did you apply the handcuffs or was that G11?</p> <p>15 A. I think it was myself that applied the handcuffs, I am</p> <p>16 not sure. I can't remember without reading my</p> <p>17 statement.</p> <p>18 Q. If you just look at page 139. I think it is the third</p> <p>19 paragraph right in between the hole-punches, third line</p> <p>20 from the bottom.</p> <p>21 A. Yes, sir.</p> <p>22 Q. "As I kept physical control of the male, who I now know</p> <p>23 to be Joseph Travers, G11 applied the handcuffs."</p> <p>24 A. G11 then.</p> <p>25 Q. Did you provide cover for G11 whilst that happened?</p> <p style="text-align: center;">Page 79</p>
<p>1 Q. Did you get sight of the passenger when you opened</p> <p>2 the -- sorry the front driver's side, beyond the</p> <p>3 passenger in the rear seat that you were dealing with,</p> <p>4 could you see in as to whether that seat was occupied?</p> <p>5 A. The driver's seat.</p> <p>6 Q. Yes.</p> <p>7 A. I only knew the driver's seat was occupied due to the</p> <p>8 intelligence picture prior to the strike but at that</p> <p>9 particular time, no, I was concentrating on the rear of</p> <p>10 the vehicle.</p> <p>11 Q. When you opened the door, what did you do?</p> <p>12 A. I identified myself as armed police.</p> <p>13 Q. What did you say?</p> <p>14 A. "Armed police, show me your hands", I would assume</p> <p>15 because is that is what I always say.</p> <p>16 Q. Did you say it or did you shout it?</p> <p>17 A. Shout it.</p> <p>18 Q. What did the person that you now know to be</p> <p>19 Joseph Travers do?</p> <p>20 A. I think he was hunched down. I can't remember. It was</p> <p>21 a matter of seconds before I took him out of the car.</p> <p>22 Q. What do you mean "hunched down"?</p> <p>23 A. I think he was crunched down from the smashing of the</p> <p>24 glass maybe, and at that point we --</p> <p>25 Q. You mean sort of cowering?</p> <p style="text-align: center;">Page 78</p>	<p>1 A. I was probably holding the suspect down to control him</p> <p>2 as the handcuffs were placed on him.</p> <p>3 Q. Was it as G11 was applying the handcuffs that you heard</p> <p>4 the shotgun reports?</p> <p>5 A. I think it was quite fluid from taking him out and</p> <p>6 putting him down, around about that time.</p> <p>7 Q. You say in your statement, "As this was happening ..."</p> <p>8 It is not clear what the as was happening --</p> <p>9 A. As we were taking him down to the ground and securing</p> <p>10 the subject.</p> <p>11 Q. You thought that it was the shotgun being discharged.</p> <p>12 Did you see the shotgun being discharged?</p> <p>13 A. No, sir. I didn't.</p> <p>14 Q. By that time, the passenger had already been in the</p> <p>15 front of the vehicle had gone. We now know that there</p> <p>16 was somebody in the front passenger seat, so when you</p> <p>17 came across the vehicle there was nobody there and you</p> <p>18 got the passenger in the rear seat, rear nearside</p> <p>19 seat --</p> <p>20 A. Yes, sir.</p> <p>21 Q. -- under control, I think?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Again, did you see anything that pointed towards the</p> <p>24 necessity of the shotgun being discharged, presumably</p> <p>25 into the tyres of the vehicle?</p> <p style="text-align: center;">Page 80</p>

<p>1 A. Again, that would be down to the officer deploying the 2 shotgun, down to his threat assessment at the time. 3 Q. Did you see anything that was obvious that required 4 that? 5 A. Not that I could remember, sir, no. 6 Q. Was Travers brought to his feet or was he placed in 7 a sitting position? 8 A. I think we moved him away from the vehicle and then sat 9 him down further away. 10 Q. At this point did you see any members of the public 11 present on the car park? 12 A. No, sir, I didn't, no. 13 Q. Did you hear any shouts to members of the public about 14 getting away from the scene? 15 A. No, sir. 16 Q. You, I think after the shotgun had been discharged 17 twice, heard somebody shout "trauma"? 18 A. Yes, sir. 19 Q. I think you saw officers administering trauma care? 20 A. That's correct, sir, yes. 21 Q. Where was that? 22 A. By the nearside of the vehicle. 23 Q. Where were you when you saw this? 24 A. Further along on the grass bank, behind the Audi and 25 further to the right, away from the car park, if that</p> <p style="text-align: center;">Page 81</p>	<p>1 Q. But when after the fact? 2 A. It could have been a matter of weeks, probably. Because 3 at that time -- with being in the firearms training unit 4 there is no pocket book entries made on a daily basis. 5 So that is why it is a delayed entry, as such. 6 Q. The reference to, "See statement", by the Saturday, 7 3 March and Sunday, 4 March there wasn't actually 8 a statement in existence? 9 A. No, that was written down after the statement was made. 10 Q. Lastly from me, please, were you colleagues with Z15? 11 If you have a look on the sheet. 12 A. Yes, sir. 13 Q. How frequently would you see him on a daily basis? 14 A. Up until temporary secondment to the training unit, 15 I would say a daily basis. 16 Q. In March 2012, at about that time, a daily basis? 17 A. No, I was seconded by that stage to the training unit. 18 Q. How frequently would you see him then? 19 A. Probably not at all, unless there was an operation 20 ongoing at the weekend. 21 Q. The same in relation to X7? 22 A. Yes, sir. 23 MR BEER: Yes, thank you very much, U9. 24 Those are my questions. 25 THE CHAIRMAN: Mr Thomas, it is now getting towards the end</p> <p style="text-align: center;">Page 83</p>
<p>1 makes sense? 2 Q. Yes. 3 In your statement you don't include any reference to 4 when State Red was declared, do you? 5 A. No, sir. 6 Q. Is there a reason for that? 7 A. No, sir. 8 Q. Because I think we have seen from the flip charts that 9 you were provided with a time at which that had 10 occurred. What was the reason for not including that? 11 A. I can't remember, sir. 12 Q. Just a couple of last points of detail, please. In your 13 bundle, if we can look, please, at tab 6. 14 A. Yes, sir. 15 Q. I think that is your pocket book entry for 3 March? 16 A. It is, sir. 17 Q. Can you see that it says, I think, "Saturday, 3 March, 18 "Saturday, 2nd" has been crossed out and, "Saturday, 19 3rd" has been written in, yes? 20 A. Yes, sir. 21 Q. "... tour of duty, 0400, Operation Shire, B2 role." 22 Then you say, "See statement"? 23 A. Yes, sir. 24 Q. When was this entry written? 25 A. That would have been after the fact.</p> <p style="text-align: center;">Page 82</p>	<p>1 of the day, I can't sit late. 2 MR THOMAS: I have quite a few questions. I reckon I have 3 about 15 to 20 minutes. 4 THE CHAIRMAN: Would you prefer to leave it until the 5 morning? 6 MR THOMAS: Yes, sir. 7 THE CHAIRMAN: Are there questions from other advocates. 8 Ms Whyte? 9 MS WHYTE: Yes, I will be less time than Mr Thomas. 10 THE CHAIRMAN: Yes. 11 Mr Weatherby? 12 MR WEATHERBY: A few from me, it depends what Mr Thomas 13 does. 14 THE CHAIRMAN: I don't think it is fair to the witness, 15 apart from anything else, to sit late and I also have to 16 think about the stenographer and the shorthand writer 17 who have been working hard all day. 18 I think it is probably sensible to adjourn at this 19 stage. 20 MR BEER: Thank you, sir. 21 THE CHAIRMAN: We will resume at 10.30 tomorrow. 22 Please do not discuss your evidence with anybody 23 else overnight. 24 A. Yes, sir. 25 THE CHAIRMAN: Thank you.</p> <p style="text-align: center;">Page 84</p>

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