

<p>1 Thursday, 30 March 2017 2 (10.33 am) 3 THE CHAIRMAN: Sorry to keep you all waiting. 4 Yes, Mr Weatherby. 5 MR WEATHERBY: Thank you. 6 X9 (continued) 7 Questions from MR WEATHERBY 8 MR WEATHERBY: Officer, I represent Anthony Grainger's 9 partner, Gail Hadfield-Grainger, and I have a few 10 questions for you. Can I start with just a couple of 11 points of clarification from your evidence. You were 12 telling us yesterday that when you broke the side window 13 and when you put the CS into the car that there was 14 a reaction from Anthony. 15 A. Yes, that's my recollection. 16 Q. You have described it variously he raised his hands from 17 below the dash to chest, you have described it as 18 flinching. It is clear, isn't it, that in no way did 19 you perceive that to be any kind of threatening motion? 20 A. No. Not the movement of the hands, no. 21 Q. No. So it was shock, compliance or involuntary 22 movement, something of that nature? 23 A. Indeed, yes, that is I think how I would describe it. 24 Q. Second clarification point, Mr Beer was asking you 25 yesterday about the lighting and he asked you whether</p> <p style="text-align: center;">Page 1</p>	<p>1 car -- 2 A. So if I deemed that there was no threat? 3 Q. Yes. What would you have done with it? 4 A. I would have performed a ditching drill, which is 5 exactly the same drill that I would undertake if 6 I was -- if I had a stun grenade for example prepped 7 outside a room and it was not required. 8 Q. You would have taken it away from the scene somewhere 9 safe and -- 10 A. No. I would have turned about, looked for an area 11 without any visible members of the public or anything 12 and launched it into that area for it to vape out into 13 the atmosphere. 14 Q. Right, that is what I was going to suggest you might 15 have done but thank you for helping us with that. 16 Can I move on then to my first real topic here. 17 I want to just consider with you the issue of the CS 18 canister, the Hatton rounds and Z15. Do you recall 19 yesterday you were telling us that you had discussed 20 with Z15 the issue of the Hatton rounds and the CS 21 canister and you had done that at Leigh police station? 22 A. I believe that is the case, yes. 23 Q. Yes. 24 It is right, I think, that the two of you had been 25 tasked with having control or being told that you were</p> <p style="text-align: center;">Page 3</p>
<p>1 you could see lighting inside the car. Do you remember, 2 he referred to the courtesy light I think? 3 A. I do recall that question, yes. He did refer to it as 4 a courtesy light. 5 Q. You said that was not on I think or you couldn't 6 remember? 7 A. I couldn't recall. 8 Q. You couldn't recall, fine. 9 Can I ask you about light trained on the car. Do 10 you recall, as you approached it, seeing light trained 11 on the car, for example from a firearm torch? 12 A. Again, I don't recall. 13 Q. You don't recall. So you might have done, you might not 14 have done? 15 A. Indeed. I don't recall. 16 Q. Third clarification point, yesterday you were asked 17 quite a lot of questions about the CSDC and you told us 18 that you had withdrawn the pin in the car? 19 A. Yes. 20 Q. You went on to say that that was an irreversible action. 21 A. Yes, I think it is with that particular canister, yes. 22 Q. Yes. 23 Can I just ask you then, if the situation had turned 24 out differently, for example if you had run to the car 25 and it was not necessary to deploy the canister into the</p> <p style="text-align: center;">Page 2</p>	<p>1 the two officers that were going to be using, if 2 required, the Hatton rounds and the CS canister. You 3 had been told that during the briefing? 4 A. That's right, yes, and that is the equipment we were 5 carrying. 6 Q. Both of you had CS and both of you had Hatton rounds? 7 A. That's right, yes. 8 Q. Simply in the briefing, X7 said words to the effect of, 9 "You two are in charge of that side of things"? 10 A. I believe that is the case, I have not looked at the 11 briefing. 12 Q. The reason therefore that you were discussing between 13 yourselves at Leigh police station after you had been 14 deployed to the lay up point -- 15 A. Yes. 16 Q. -- was presumably you were working out what to do 17 between you? 18 A. It was to seek that clarification. As I think 19 I described yesterday, who, if it came to it in and the 20 circumstances required it, who would take primacy with 21 which weapon. 22 Q. In the absence of command that you were to deal with CS 23 and Z15 was to deal with the tyres with the Hatton 24 rounds, you then took the initiative and sorted it out 25 amongst yourselves?</p> <p style="text-align: center;">Page 4</p>

<p>1 A. That was the initial order that we discussed or our 2 priorities if it came to it. 3 Q. As I understand it, the order was that the two of you 4 were to deal with the shotgun and the CS gas but what 5 I am suggesting to you is that you then went off and on 6 your own initiative sorted it out amongst yourselves. 7 Is that how it happened? 8 A. Yes, certainly. 9 Q. As I understood your evidence yesterday, the 10 conversation was simply between the two of you? 11 A. As I recall, yes. 12 Q. No one else involved, yes. 13 Can I then move on with those introductory points to 14 some training material. Because the use of a shotgun, 15 Hatton rounds and the use of the CSDC is something that 16 you drilled for, you trained for? 17 A. We trained with them, yes. 18 Q. Indeed you started -- Mr Beer adduced the fact that you 19 had been on a variety of MASTS training, AFO training, 20 and particularly MASTS training? 21 A. Yes, indeed. That's correct, yes. 22 Q. Can I then turn to the training material that we have 23 been provided, which is at tab 32 of the general 24 firearms bundle, please. 25 We have dealt with some of the points in this</p> <p style="text-align: center;">Page 5</p>	<p>1 undertaken that there would be various scenarios put, 2 yes? 3 A. Yes. 4 Q. If you look there at scenarios. At the third paragraph, 5 "The scenarios will begin with a standard offside and 6 nearside stop", yes? 7 A. Yes. 8 Q. "They will then progress to parked vehicles within 9 parking spaces, persons alighting from vehicles ..." 10 A. Yes. 11 Q. Yes? 12 The conventional stops that you were referring to 13 yesterday would be the standard offside and nearside 14 stop, yes? 15 A. Yes. 16 Q. The unconventional would be anything else, but as we can 17 see here -- 18 A. That's right. 19 Q. -- a rather relevant reference to parking within parked 20 spaces, yes, so something that would be generally 21 covered within the training. 22 It is that that I really want to go through with 23 you. As part of this training pack, rather conveniently 24 for our purposes there was a helpful PowerPoint, okay, 25 so can I ask you to go to page 25, please.</p> <p style="text-align: center;">Page 7</p>
<p>1 already, so I am going to move very swiftly through most 2 of it -- 3 A. I've got it here, yes. 4 Q. -- there is just some specific points. To orientate you 5 and everybody else I am just going to stop at a few 6 waypoints. Do you have that in front of you now? 7 A. I believe I have, yes. 8 MR WEATHERBY: Do you have it, sir? 9 THE CHAIRMAN: Yes. 10 MR WEATHERBY: Good. 11 Can I then just start at the first page, which is 12 just the cover sheet from the IPCC. Just to orientate 13 us that this is a MASTS training package that seems to 14 have been used between March 2010 and November 2011, 15 yes? 16 Can we then move to page 17, using the page numbers 17 at the top right. 18 A. Titled "Scenarios", that page? 19 Q. Yes. 20 This is a training package and people may want to 21 pick up other points from it but I am just going to move 22 through it very quickly. As part of the training, there 23 were various scenarios, yes? 24 A. Yes. 25 Q. Do you remember during the training that you have</p> <p style="text-align: center;">Page 6</p>	<p>1 This is the start and it is Greater Manchester 2 Police as you can see, a training pack from just before 3 the incident we are concerned with. Presumably this is 4 the sort of training that you would have done? 5 A. Sorry, just to clarify, is this still in the small 6 print, 25 MASTS, the one entitled -- 7 Q. It is a PowerPoint and this is the first page. It says, 8 "MASTS mobile ..." 9 THE CHAIRMAN: You might find it easier to use the large 10 numbers actually at the bottom of the page, because they 11 are probably unique. You may find several 25s. It is 12 507, I think isn't it, Mr Weatherby? 13 MR WEATHERBY: There is a 507, there is a 25, yes. 14 A. Sir, I am just clarifying I am on the right page, am I? 15 Yes. 16 Q. Yes. This is just a front screen, it would be. Do you 17 have that? 18 A. Yes, I have. 19 Q. Thank you. Moving through that, to page 27, please, so 20 two pages on, 509 on the bigger thing and then it deals 21 with MASTS: 22 "Conventional MASTS consist of three surveillance 23 vehicles, each with three AFOs and one member of the 24 DSU. The vehicles are categorised alpha, bravo, 25 charlie."</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

1 Now of course it is more flexible than that,
 2 isn't it? Sometimes you will have two vehicles,
 3 sometimes you will have four, sometimes you will have
 4 three?
 5 **A. Yes, that's correct.**
 6 Q. Here it says a conventional team is three cars, yes?
 7 **A. Indeed, yes.**
 8 Q. Basically you have three AFOs plus a driver. Then
 9 subsequent pages deal with a number of matters that we
 10 have already dealt with in evidence and I am not going
 11 to take you to those, other people might.
 12 **A. Can I clarify, all four are AFOs now within the MASTS,**
 13 **rather than three AFOs and a driver.**
 14 Q. Nothing turns on that, but originally it would be the
 15 driver was not an AFO, is that right?
 16 **A. That is true, back in the day that was the case.**
 17 Q. Sure, okay. You have got four AFOs but it is sort of
 18 three active AFOs plus a driver?
 19 **A. Yes, he is still part of the team.**
 20 Q. Yes, of course. I am not suggesting otherwise.
 21 The subsequent pages deal with a number of
 22 matters -- as I say we have already dealt with so I am
 23 not going to take up time with them -- things like the
 24 Green, Amber, Red traffic light system.
 25 It is page 37 that I wanted to turn to next, 521 on

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1 the bigger numbers.
 2 **A. Yes.**
 3 Q. This is headed "Weaponry".
 4 **A. Yes.**
 5 Q. Yes?
 6 For the purposes of the training package, the
 7 training package is dealing with the alpha and the bravo
 8 car, so "A" is alpha and "B" is bravo?
 9 **A. Yes.**
 10 Q. Weaponry, A1 is the front passenger seat, A2 is the
 11 person behind the driver and A3 is the person behind the
 12 front passenger seat, yes?
 13 **A. Yes.**
 14 Q. The same for the other cars?
 15 **A. Yes.**
 16 Q. So we there see the weaponry, so alpha, the A1 is in
 17 fact the OFC, as well, yes?
 18 **A. Indeed.**
 19 Q. The OFC, relevant to a point I am going to make later,
 20 has a window breaker, yes?
 21 **A. They do on that training package, yes.**
 22 Q. Sure.
 23 Then in the bravo car, the front passenger has the
 24 shotgun, and the offside rear has the CS canister, in
 25 fact on the deployment that we are considering that is

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1 you?
 2 **A. On that PowerPoint slide, yes. That's correct, it does**
 3 **say that, yes.**
 4 Q. Yes.
 5 So the shotgun and the CS officers are there
 6 together in the same car as a team?
 7 **A. They are in this particular slide, yes.**
 8 Q. Yes, they are in this. You have made that point
 9 a couple of times. That is the way it should be,
 10 isn't it?
 11 **A. This a training package relating to the MASTS tactic,**
 12 **albeit that doesn't obviously represent the deployment**
 13 **that we had on the day. The weaponry et cetera was, as**
 14 **we know, different.**
 15 Q. That's correct, it doesn't but I am putting this to you
 16 because this is the training package that we have. I am
 17 not suggesting that it is not a flexible matter but what
 18 I am suggesting to you in terms of that last point about
 19 the shotgun and the CS, the reason that the officers are
 20 in the same car is because you work as a team?
 21 **A. Yes. I don't know if you're aware or not but the MASTS**
 22 **package -- training package and deployment has changed**
 23 **over the years, so whether this is in relation to the**
 24 **older tactic where we had very prescriptive points to**
 25 **cover and designated areas and routes to run, I couldn't**

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1 **say.**
 2 **Just so you are aware of that.**
 3 Q. Okay, but the reason I am putting this to you and the
 4 reason I have grounded it in the way I have done, is
 5 because this is the package that GMP have disclosed.
 6 Which as I understand it, I will be corrected if I am
 7 I wrong, was the training package that was relevant to
 8 the period that we are considering.
 9 **A. I would have to agree with you on that, I don't know**
 10 **otherwise.**
 11 Q. If I am wrong somebody will correct me, I am sure.
 12 **A. Yes.**
 13 Q. I am not suggesting that there isn't a degree of
 14 flexibility, what I am actually putting to you is that
 15 this is what you are drilled in, this is what you are
 16 trained in and therefore this is effectively a default
 17 position which can be varied but this is the position
 18 that, because this is what you are trained in, this is
 19 what you are expecting as a default. Yes?
 20 **A. Yes.**
 21 Q. Right. Moving on then, having dealt with what I am
 22 shortending as the default weaponry --
 23 THE CHAIRMAN: I'm sorry to interrupt. I am not sure I have
 24 the positions in the car right actually. I am
 25 struggling a little bit, it is my fault.

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1 MR WEATHERBY: I am going to deal with that, if it is
 2 helpful.
 3 THE CHAIRMAN: It is what you have already covered that I am
 4 not sure I have. A1 is front passenger?
 5 MR WEATHERBY: A1 is front passenger.
 6 THE CHAIRMAN: A2?
 7 MR WEATHERBY: A2 is behind the driver.
 8 THE CHAIRMAN: A2 is behind the driver, so my note is wrong.
 9 A3?
 10 MR WEATHERBY: A3 is behind the front passenger.
 11 THE CHAIRMAN: Nearside rear. Thank you.
 12 MR WEATHERBY: I may have said it wrong first time round.
 13 THE CHAIRMAN: It may be my fault. It was not making sense,
 14 but it does now.
 15 MR WEATHERBY: It will make sense in a moment, I hope.
 16 THE CHAIRMAN: Thank you.
 17 MR WEATHERBY: 37, we have dealt with the weaponry.
 18 38, we then have some rather helpful diagrams. 38
 19 shows an offside strike and 39 shows a nearside strike,
 20 so two conventional options, yes?
 21 **A. Yes.**
 22 Q. Okay.
 23 In both of those scenarios, I am going to move
 24 between the two, but in both of those scenarios, you can
 25 see that A1, the AFO, and I am sorry this is horribly

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1 complicated because of the different cyphers but in our
 2 scenario, that is X7 in fact?
 3 **A. Okay, yes.**
 4 Q. Yes, but the OFC, in both of the conventional strikes,
 5 deploys from the car but as you can see, does not have
 6 a specific action role at that point, yes?
 7 **A. From the diagram it looks that way.**
 8 Q. Yes. That is logical isn't it because the OFC is the
 9 commander?
 10 **A. Indeed, he is.**
 11 Q. Yes.
 12 Then in both of these scenarios, B1 and B3 -- those
 13 are the nearside passengers of bravo, yes?
 14 **A. Yes.**
 15 Q. So B3 is you?
 16 **A. Yes.**
 17 Q. They, in both of these scenarios, are the shotgun and
 18 the CS gas officers?
 19 **A. Indeed, yes.**
 20 Q. They, in both scenarios, deploy to the nearside of the
 21 car, so whether it is an offside or nearside strike, the
 22 default position is to deploy to the nearside of the car
 23 and work as a team and use those munitions as necessary
 24 or not?
 25 **A. From this diagram, yes, if circumstances dictate.**

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1 Q. Yes.
 2 The next point is, on both of these strikes the way
 3 it works is that the only person that stays within alpha
 4 and the only person that stays within bravo is the
 5 driver?
 6 **A. Yes, from these diagrams, yes. But that is not the**
 7 **case --**
 8 Q. We know it was not the case on the incident that we are
 9 considering at the moment, I am just going through at
 10 the moment the training package, what I have suggested
 11 to you is a default position, what you are drilled in --
 12 **A. Can I just check, and I don't know if this is relevant**
 13 **as well. In relation to the training as well, I think**
 14 **yesterday we were shown video footage of a canister**
 15 **being deployed, and from recollection it shows and again**
 16 **I might be wrong here, I think it shows cover into the**
 17 **vehicle by a person with the shotgun, him moving**
 18 **alongside the vehicle. That is something we have not**
 19 **done for a long time either. Because it is not an**
 20 **antipersonnel weapon, but -- so I am just trying to**
 21 **raise the fact that this doesn't seem to fit, certainly**
 22 **what we do now anyway.**
 23 Q. Right. Again, I will stress to you again that this is
 24 the training package that we understand was the training
 25 package certainly till November 2011, so shortly before

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1 the incident and presumably the training that you would
 2 have undergone. I am suggesting to you, and I think you
 3 have accepted, that this would be a default position,
 4 and a default position from which you might be tasked to
 5 do something different because of the particular
 6 circumstances, but this would be the starting point?
 7 **A. Indeed, it is a starting point it is a framework on the**
 8 **operating procedures.**
 9 Q. Again, sticking with these two diagrams. We don't need
 10 to go in detail through what everybody does here because
 11 it is just slightly different on each but the position
 12 is that in effect five of the AFOs in the two cars
 13 attack or approach -- I don't know what the right word
 14 is -- the target car, yes?
 15 **A. Yes.**
 16 Q. The commander stands off because the commander is
 17 commanding, and the drivers are in the car because they
 18 are drivers, and they are in control of the car. Yes,
 19 that is how it is?
 20 **A. In that training scenario, yes.**
 21 Q. Yes. Moving on then to the responsibilities, the
 22 responsibilities are dealt with in the subsequent pages,
 23 so on page 40, we see the team leader, the OFC, and the
 24 list of responsibilities that they have, including
 25 initiating the strike, overseeing the deployment from

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1 start to finish and listening for any shout of "Locked
 2 doors", yes?
 3 **A. Yes, it does say that.**
 4 Q. The drill, if you like, is that the OFC stands off,
 5 because he or she is in command, but then there is this
 6 additional point at the end and that is why they have
 7 the window breaker?
 8 **A. Right.**
 9 Q. Yes?
 10 **A. Yes.**
 11 Q. Page 41, again this deals with the position of A2, it is
 12 not very clear from the actual diagram but it is clear
 13 from the one before and after it. A2, in our scenario,
 14 is Q9, so it is the person sat behind the driver, yes?
 15 **A. Yes.**
 16 Q. Again, under both the conventional drills, Q9 alights
 17 from the car on the strike. On the offside -- well, we
 18 can see what they do, but on the nearside stop A2, or
 19 Q9, has the specific responsibility/requirement,
 20 whatever we want to call it, that they will be the one
 21 that shouts "Open", indicating when the doors are to
 22 open. Yes?
 23 **A. Yes, again it does say that.**
 24 Q. If it is an offside stop they don't, they wait till
 25 somebody else does it but on the nearside stop that

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1 falls within their remit.
 2 We then have A3 on the next page -- sorry, just
 3 sticking with A2 for a moment. You will notice on the
 4 offside and the nearside stop, A2 alights from one or
 5 other door. They don't necessarily get out of their
 6 door, yes?
 7 **A. Yes, that is what it says, yes, sorry.**
 8 Q. I am not going to take you back to the diagrams, but in
 9 fact that is the opposite side from where the target car
 10 is, yes?
 11 **A. Yes.**
 12 Q. Again, the purpose of that may be obvious but that is
 13 set out in the drill as well.
 14 In the nearside stop, they have this duty of
 15 shouting "Open" for opening the doors. In the other
 16 scenario in fact Q9, or A2 as it is here, appears to
 17 have the duty of going round and covering the shotgun
 18 and CS gas officers -- I have put that wrongly, haven't
 19 I? It is the same one?
 20 THE CHAIRMAN: Where is this?
 21 MR WEATHERBY: Let me put that again, because I put it
 22 slightly wrongly. On page 41 --
 23 THE CHAIRMAN: That is what I am on, yes.
 24 MR WEATHERBY: -- the nearside stop, alight rear nearside
 25 door, ie the one furthest from the target car, the

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1 opposite one from the natural door if you like. Make
 2 their way round to the front nearside door of the
 3 subject car providing cover for B1 and B3, so that is
 4 shotgun and CS.
 5 THE CHAIRMAN: This is all A2 this page is it?
 6 MR WEATHERBY: This is all A2.
 7 THE CHAIRMAN: It doesn't actually say so, but it is.
 8 MR WEATHERBY: I think it is -- it doesn't, but it seems to
 9 be blacked out by the shadow but if we look at the
 10 preceding --
 11 THE CHAIRMAN: Yes, I can see A1 and A2. Right, okay and we
 12 are all agreed this is A2?
 13 MR WEATHERBY: Yes.
 14 A2, or Q9 on our scenario, out of the car, the
 15 opposite side from the target car, runs round, has the
 16 duty of shouting when it is ready to open the car and
 17 also to provide cover for the shotgun and the CS gas,
 18 yes?
 19 **A. Yes.**
 20 Q. A3 is then dealt with on the next page, I don't think we
 21 need to dwell on that.
 22 Again, I am not going to take you, unless anyone
 23 wants me to, through B1 on the page after that. B1 is
 24 primarily shotgun. The duties of B1 is then dealt with
 25 dependent on what is authorised and what isn't on the

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1 following page.
 2 **A. Yes.**
 3 Q. Then on page 45 we have B2.
 4 Then on page 46 we have you, which is B3. That the
 5 CS officer, yes?
 6 **A. Yes.**
 7 Q. Then, after that, we have charlie and delta vehicles on
 8 47?
 9 **A. Yes.**
 10 Q. First point, the role of charlie and delta is, due to
 11 the tactic, a fluid role. For example if one of the
 12 cars, alpha or bravo breaks down -- one of the things
 13 that happens to all of us occasionally -- then charlie
 14 or delta can take over if they are deployed?
 15 **A. Yes, that is one of the options available, yes.**
 16 Q. Or if there is an operation where suddenly there are two
 17 targets, you then, if you have the four cars, can split
 18 them, yes?
 19 **A. Yes.**
 20 Q. A second point on page 47 with charlie and delta is that
 21 the positions and weaponry within the vehicles should
 22 mirror the positions in the alpha and bravo vehicles.
 23 Then the point I have just made, they should be able to
 24 deploy separately as an alpha or bravo vehicle for
 25 breakdowns?

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1 **A. Yes.**
 2 Q. Then if a normal strike is called they are extras and
 3 they position themselves as best they can, looking for
 4 work I think, or finding their own work or -- your
 5 phrase from yesterday.
 6 **A. That was my phrase from yesterday.**
 7 Q. That suggests, doesn't it, that charlie and delta mirror
 8 the alpha and bravo for those reasons, yes?
 9 **A. Yes.**
 10 Q. Then we move on to non-conventional stops, which is on
 11 the next page, which is 48, or 532 if you are looking at
 12 the big numbers. It specifically refers to -- one of
 13 the potential scenarios is parking in a parking bay.
 14 Then it says:
 15 "If practicable the OFC, A1, should relay to other
 16 vehicles their position in relation to the subject
 17 vehicle."
 18 Then:
 19 "Attempts should be made to keep alpha and bravo in
 20 position. On occasion this will not be possible and it
 21 could be that any of the vehicles takes on these roles."
 22 Yes?
 23 **A. Yes.**
 24 Q. "In these cases AFOs should alight by their own door and
 25 approach the subject vehicle on that side, to the first

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1 door they come to and keep the door closed."
 2 Yes?
 3 **A. Yes.**
 4 Q. "The original B1 and B3 will still work as a team as
 5 mentioned and will approach the vehicle in the same
 6 manner on whichever side they deploy, and then they will
 7 deploy in the usual manner."
 8 Yes?
 9 **A. Indeed, yes.**
 10 Q. Basically what the non-conventional training drill is,
 11 is that you carry on the conventional setup of where
 12 people are in the cars, and the changes that of course
 13 it is not as set piece as the conventional stops, it is
 14 in the name, unconventional, but the alpha goes to one
 15 side and the bravo goes to the other, in essence. But
 16 the special munitions are dealt with in the same way as
 17 a team in the bravo car, yes?
 18 **A. Yes, that is what it does say here, yes.**
 19 Q. Yes.
 20 In the scenario that you were faced with on the 3rd,
 21 the alpha AFOs should end up on the offside and the
 22 bravo on the nearside?
 23 **A. In theory.**
 24 Q. Yes. There is nothing here that suggests that the OFC
 25 should operate in a way different to the conventional

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1 deployment, so the OFC, you would expect on this
 2 training package, to stand off unless there was
 3 a "Locked doors" shout?
 4 **A. On the training package, sir, yes, certainly.**
 5 Q. Yes.
 6 Again you would expect that the shotgun and CS
 7 officer would be in the same car, in the bravo? I am
 8 referring back to "still work as a team" on the
 9 unconventional page 48, yes?
 10 **A. Yes.**
 11 Q. That didn't happen in fact as we know, yes?
 12 **A. We were armed deployed differently than this.**
 13 Q. Was there any reason that you are aware of -- you were
 14 not in control here, so I am just asking whether you
 15 were aware of this, any reason you were aware why the
 16 shotgun officer was not deployed with you as a team in
 17 the same car?
 18 **A. I can only allude to the fact as I said this has been**
 19 **a developing tactic and I would imagine at some point it**
 20 **has perhaps been identified that the shotgunner**
 21 **providing cover alongside the subject vehicle isn't**
 22 **appropriate, it isn't an antipersonnel weapon, and that**
 23 **we have obviously changed our standard operating**
 24 **procedure in relation to that, but I don't know at what**
 25 **point that has occurred.**

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1 Q. Right, well on the actual day of the deployment, you
 2 didn't know at the start of the day at 5.00 or 6.00 or
 3 4.00 in the afternoon, whether first of all there was
 4 going to be a strike at all but if there was a strike,
 5 whether it was going to be conventional or
 6 non-conventional?
 7 **A. Absolutely.**
 8 Q. As far as you are aware, the plan, such as it was, was
 9 that you were always going to be in bravo and Z15 was
 10 always going to be in charlie?
 11 **A. Yes.**
 12 Q. Then, finally, just for completeness, the next page, it
 13 is the last page, the middle of the page:
 14 "If any of the doors are found to be locked, a shout
 15 of 'Locked doors', should be given."
 16 Then that is the point at which the OFC changes from
 17 simply being a command officer to making way to smash
 18 the windows as is their role, yes?
 19 **A. Yes, it does say that.**
 20 Q. That is the same point I have been making through you,
 21 which is on this drill the OFC is commanding and then
 22 only gets involved in the action if there is a "Locked
 23 door" shout, yes?
 24 **A. Yes, I mean this is the standard operating procedure or**
 25 **as we now refer to it, it is a framework, that is how it**

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<p>1 is --</p> <p>2 Q. It is a framework?</p> <p>3 A. It is a framework and you can step out of that</p> <p>4 framework, if you can justify it.</p> <p>5 Q. Indeed, absolutely. I am not suggesting otherwise but</p> <p>6 that of course would require some command, wouldn't it?</p> <p>7 A. It would what, sorry?</p> <p>8 Q. If you are going to change a default position or</p> <p>9 a starting position --</p> <p>10 A. Certainly in relation to a starting position, yes --</p> <p>11 Q. -- somebody has to change it?</p> <p>12 A. -- but on the ground, what I'm saying is obviously the</p> <p>13 circumstances may dictate that other movements et cetera</p> <p>14 are necessary, are justified.</p> <p>15 Q. Yes, but the point I am trying to consider with you is</p> <p>16 that you start from a starting point or a default</p> <p>17 position, of course it is a flexible tactical option,</p> <p>18 but if you going to make it flexible from the default</p> <p>19 position, somebody has to do that?</p> <p>20 A. You have to have a starting point, yes.</p> <p>21 Q. Yes.</p> <p>22 Finally, just whilst we are on that page, somebody</p> <p>23 covers the boot and then it is stressed that the "boot"</p> <p>24 should always be referred to as another word, is there</p> <p>25 any particular reason for that, is there anything</p> <p style="text-align: center;">Page 25</p>	<p>1 did what you did of your own initiative, yes?</p> <p>2 A. I did, that's right.</p> <p>3 Q. Thank you. You can put that to one side, I only have</p> <p>4 a few more points for you.</p> <p>5 In terms of timings, you gave Mr Beer some timings,</p> <p>6 particularly about Amber and Red.</p> <p>7 A. Yes.</p> <p>8 Q. You can put that away, we are not going to go back to</p> <p>9 that.</p> <p>10 A. Thank you.</p> <p>11 Q. Am I right that you simply got those timings from the</p> <p>12 flip chart on 9 March?</p> <p>13 A. I believe I did, yes. I would have, yes. Without</p> <p>14 having a transcript of the DSU, surveillance commentary</p> <p>15 I wouldn't have been able to put them into a specific</p> <p>16 timeline.</p> <p>17 Q. Yes.</p> <p>18 Now, Q9. Can you help us when -- because you were</p> <p>19 not aware that Q9 had stayed in the car, were you,</p> <p>20 whilst you were deploying?</p> <p>21 A. No.</p> <p>22 Q. You didn't see him? You didn't see the window open and</p> <p>23 the gun out of it?</p> <p>24 A. I did not, no.</p> <p>25 Q. I am not suggesting there is any reason you should have</p> <p style="text-align: center;">Page 27</p>
<p>1 relevant to us here?</p> <p>2 A. Only that you don't want to advertise the fact that if</p> <p>3 there is somebody in there, you are going to open the</p> <p>4 boot. Sorry, is that what you were referring to?</p> <p>5 Q. Yes, it was just a curiosity and we are at the end of</p> <p>6 the training package. I just wanted to see whether</p> <p>7 there was any particular --</p> <p>8 A. That is not one the initial threats obviously, it is --</p> <p>9 Q. Not relevant to us.</p> <p>10 It is clear, isn't it, having gone through that in</p> <p>11 a little detail that that is not what happened on the</p> <p>12 day?</p> <p>13 A. No.</p> <p>14 Q. I think it is clear, but please help me with it, from</p> <p>15 the answers you gave yesterday that there was no</p> <p>16 discussion about changing from a normal plan in terms of</p> <p>17 the deployment. Was there?</p> <p>18 A. No.</p> <p>19 Q. There were no commands received by you as to how to do</p> <p>20 it?</p> <p>21 A. No, not to do that.</p> <p>22 Q. When you were called Amber you went towards the scene?</p> <p>23 A. Yes.</p> <p>24 Q. When you were called Red and you moved almost</p> <p>25 immediately to the strike option, you simply got out and</p> <p style="text-align: center;">Page 26</p>	<p>1 done, for the reasons we have just been through.</p> <p>2 A. No, that is a fact, I didn't see that.</p> <p>3 Q. Yes, that in fact you didn't.</p> <p>4 When did you first discover that it was Q9 that had</p> <p>5 shot Anthony Grainger?</p> <p>6 A. I believe it was some time after first aid had been</p> <p>7 administered.</p> <p>8 THE CHAIRMAN: Sorry, somebody coughed. It was some time</p> <p>9 after?</p> <p>10 A. I believe it was some time after we had administered</p> <p>11 first aid or we were in the process of administering</p> <p>12 first aid and it was probably pointed out to me at that</p> <p>13 point, obviously.</p> <p>14 MR WEATHERBY: Do you remember?</p> <p>15 A. I don't recall, I am trying to. It is the best I can.</p> <p>16 Q. You cannot help us how you discovered that it was Q9?</p> <p>17 A. I can't, no.</p> <p>18 Q. It is just that when officer G1, who is one of the delta</p> <p>19 vehicle officers, when he or she gives evidence</p> <p>20 I anticipate they are going to say that you identified</p> <p>21 Q9 --</p> <p>22 A. Ah, right.</p> <p>23 Q. -- as the principal officer. Do you recall doing that?</p> <p>24 A. I don't recall that, no.</p> <p>25 Q. You don't recall that.</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 Finally, I just want to return to the issue of 2 statements. Mr Beer has covered most of this but I just 3 want to ask you a few more questions. 4 You confirmed that your first account was 9 March, 5 six days after the shooting? 6 A. Yes. 7 Q. You told us yesterday, page 114 of the transcript for 8 anyone who is making a note, that you had not made 9 a statement in that collective way before with a flip 10 chart? 11 A. No, not to my knowledge. 12 Q. In any investigation or scenario you had ever been 13 involved in? 14 A. Not that I can recall, no. 15 Q. You said this, you said that you were advised not to 16 make an account until it could be done in an "organised 17 fashion", yes? 18 A. Yes, that is ... 19 Q. I didn't quite understand what you meant by that, it 20 might just be me but what did you mean by advised not to 21 make an account until it could be done "in an organised 22 fashion"? 23 A. I don't recall specifically being told that. That was 24 my interpretation of how we were advised to approach the 25 subject of writing a statement. I think --</p> <p style="text-align: center;">Page 29</p>	<p>1 Q. You are telling us now that there may have been some 2 advice about a calm down period, if I can put it like 3 that, my words, but that thereafter you were really 4 rather keen to make an account? 5 A. Yes, yes, indeed I think that is a natural thing to want 6 to do, certainly in circumstances like this, but this 7 was an unknown set of circumstances. 8 Q. I am certainly not going to argue with you about that. 9 If you were keen to do it, what was actually stopping 10 you, why didn't you get your pocket notebook out and 11 make a full account or even make a statement? 12 A. I believe it was just under some guidance or advice. 13 Q. Under some guidance, advice, orders? 14 A. That might be too strong a word. 15 Q. Well who from? 16 A. Again, I don't recall specifically who that came from, 17 we had a number of people who attended the post-incident 18 procedure from chief inspector, federation ranks, 19 ultimately there was some contact with a legal 20 representative, and I think that was a force legal 21 representative who -- between all of those or at some 22 point we were given some guidance. 23 I apologise, sir, I didn't record that fact either 24 so I couldn't tell you specifically. 25 Q. It is a long time ago, I get that, but this was really</p> <p style="text-align: center;">Page 31</p>
<p>1 Q. In any situation -- 2 THE CHAIRMAN: Were you going to add something? 3 A. I was going to say I think that was obviously in light 4 of the fact we had definitely been given some advice 5 regarding a period of reflection to allow things to 6 settle down in the mind, and I think it was obviously 7 an extension of that. 8 MR WEATHERBY: Right. 9 I mean that would account for an hour or a day or at 10 a push two days -- 11 A. Yes. 12 Q. -- but not six days, would it, officer? 13 A. No, I think from my recollection, again I think we were 14 pushing to put pen to paper to record our memories of 15 the events, because obviously they do fade as time goes 16 on. 17 Q. Yes. I mean I am rather stating the obvious here I know 18 but the normal course of events in any policing is that 19 you see a significant incident, not necessarily 20 an offence but just anything significant. You make 21 a note of it, don't you? 22 A. Yes, yes, you do. 23 Q. Right from training school, right from day one in the 24 job, that is what you are trained to do? 25 A. Yes, indeed that is what you are advised to do.</p> <p style="text-align: center;">Page 30</p>	<p>1 a one-off, this whole incident -- 2 A. Yes, I agree. 3 Q. -- wasn't it? You have told us yesterday and just in 4 the last few minutes how absolutely unusual it is to 5 wait six days to give a first account. You honestly 6 can't remember who told you not to do that? 7 A. I honestly can't recall. I do apologise, I can't. 8 Q. Would you agree with me that you were being managed in 9 how you were going to express yourself or in providing 10 a statement? 11 A. We were certainly being managed in relation to when we 12 were going to do it, not into how we provided the 13 statement. 14 Q. Yes. 15 You were not being treated as a principal witness by 16 the IPCC, were you? 17 A. No. No, sir, I wasn't. 18 Q. You were a significant witness because you were in close 19 proximity to what happened? 20 A. Yes. I was, yes. 21 Q. Is it right that the IPCC wanted to interview you about 22 these matters? 23 A. I don't recall ever being interviewed about it. 24 Q. I don't think you ever were interviewed, that is what 25 I am coming on to ask you about, but my understanding is</p> <p style="text-align: center;">Page 32</p>

<p>1 that you were asked to give an interview to the IPCC and 2 declined?</p> <p>3 A. Right. Again, I don't recall that fact, sir. I can't 4 see why I would have necessarily declined to do so.</p> <p>5 Q. Am I right about that, that you were asked to give 6 an interview and declined or not?</p> <p>7 A. I don't know if you are right, because I don't actually 8 know.</p> <p>9 Q. You don't actually know?</p> <p>10 A. Unless you have got some correspondence. I don't 11 recall.</p> <p>12 MR WEATHERBY: I will take that up with another witness. 13 Thank you very much.</p> <p>14 THE CHAIRMAN: Yes, Mr Davies.</p> <p>15 MR DAVIES: Sir.</p> <p>16 Questions from MR DAVIES</p> <p>17 MR DAVIES: I represent Q9.</p> <p>18 If I start with that last line of questioning. Of 19 course this was something of an unique situation for 20 you, wasn't it, in the sense that it was the first time 21 you had been involved in an incident involving the fatal 22 shooting of anybody by a police officer?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Following the event, the post-incident procedure kicked 25 in?</p> <p style="text-align: center;">Page 33</p>	<p>1 Q. -- the rest of your account, your personal recollection 2 of events, is yours, unaffected by any process?</p> <p>3 A. Yes.</p> <p>4 Q. All right.</p> <p>5 I want to pick up on a few things that you were 6 asked both yesterday and today.</p> <p>7 Firstly, you leave your vehicle with the capacity to 8 deploy your CSDC without the need to engage it, in other 9 words you had already armed it, if I can use that 10 expression --</p> <p>11 A. I had prepared it, yes.</p> <p>12 Q. -- in advance and you have explained why that is. 13 You have the window breaker in hand?</p> <p>14 A. Yes.</p> <p>15 Q. That is some sort of metal hammer type device, is it?</p> <p>16 A. Indeed, yes.</p> <p>17 Q. You were also necessarily having to control, you have 18 said, your own --</p> <p>19 A. The Remington shotgun that I was carrying.</p> <p>20 Q. The shotgun. A weapon with the distinctive sound, 21 I think?</p> <p>22 A. Yes, I would say so.</p> <p>23 Q. You run between bravo and the back of alpha?</p> <p>24 A. Yes, that was the route.</p> <p>25 Q. Directly to the subject vehicle?</p> <p style="text-align: center;">Page 35</p>
<p>1 A. Indeed it did, yes.</p> <p>2 Q. This was all under the superintendence of the 3 independent investigation under the Police Reform Act by 4 the IPCC, correct?</p> <p>5 A. I believe so, there were a number of representatives 6 there.</p> <p>7 Q. Yes, and integrated to the post-incident procedure is 8 a range of other people, federation lawyers, senior 9 police officers for the force, welfare people and the 10 rest. It is a managed process in that sense?</p> <p>11 A. Indeed, yes.</p> <p>12 Q. And has been the subject of scrutiny and no doubt will 13 be into the future but you as a witness to events were 14 integrated to that post-incident procedure and acted on 15 advice?</p> <p>16 A. Indeed.</p> <p>17 Q. As to when to make your statement?</p> <p>18 A. Yes.</p> <p>19 Q. The flip charts associated with that process are in 20 evidence, has anything in those flip charts affected the 21 sequence of events as you have described them in your 22 statement, first statement of March?</p> <p>23 A. No.</p> <p>24 Q. So there are neutral points put on the flip charts --</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 34</p>	<p>1 A. Yes.</p> <p>2 Q. Where was the threat in this situation at that time?</p> <p>3 A. The threat was from within that vehicle.</p> <p>4 Q. Yes. You are not able, are you, to describe what the 5 occupants of alpha were doing as you ran towards the 6 subject vehicle?</p> <p>7 A. No. No.</p> <p>8 Q. What were you looking at?</p> <p>9 A. The subject vehicle.</p> <p>10 Q. Why?</p> <p>11 A. Because that was the threat to me.</p> <p>12 Q. Keep your voice up. 13 That is the threat?</p> <p>14 A. Yes.</p> <p>15 Q. What was the level of threat you believed existed in 16 that vehicle to you and other officers, as you 17 approached it?</p> <p>18 A. I believed the occupants of the vehicle had access to 19 a firearm in that vehicle. And that obviously posed 20 a threat to all who were then going to contain and deal 21 with the vehicle and subjects.</p> <p>22 Q. Yes. To state the obvious, the threat from such 23 a weapon within the vehicle was of fatal injury to 24 officers?</p> <p>25 A. Yes, potentially, yes.</p> <p style="text-align: center;">Page 36</p>

1 Q. And such a weapon could have been discharged with lethal
 2 effect from inside the vehicle to those outside?
 3 **A. Yes.**
 4 Q. That is just a matter of common sense?
 5 **A. Indeed.**
 6 Q. In terms of your sensory perception as you ran towards
 7 that vehicle, in this dynamic situation, you are
 8 concentrating on what you are looking at in that
 9 vehicle, in terms of threat, aren't you, rather than
 10 what you are listening to?
 11 **A. Yes. Yes, certainly at that point your primary senses**
 12 **are your sight.**
 13 Q. Indeed it is a trained part -- it is an element of
 14 training, to firearms officers and others, the
 15 physiological phenomenon of auditory exclusion in
 16 situations of danger and threat. You are familiar with
 17 that?
 18 **A. I am familiar with that, I have heard of that, yes.**
 19 Q. It is where, under situations of danger and threat, any
 20 human being will exclude their auditory function in
 21 favour of what they are looking at in terms of threat.
 22 It is an ordinary response to danger, yes?
 23 **A. I have heard of that, yes. Yes.**
 24 Q. In the dynamic situation you faced, you have a lethal
 25 threat in that vehicle, you are running towards it, in

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1 a moment no doubt of significant adrenaline for you,
 2 whatever your training that cannot be removed, and we
 3 are measuring time here insofar as one can measure it in
 4 the compass of seconds rather than minutes?
 5 **A. Yes, I would say so, yes.**
 6 Q. It is another part of training, isn't it, that dynamic
 7 and dangerous situations like this tend to distort
 8 people's perception of time?
 9 **A. Yes, I am again aware of perceptual distortion.**
 10 Q. As you approached the vehicle, you said yesterday,
 11 page 130, that you were not aware of other officers
 12 outside their vehicles at the stage you approached the
 13 subject vehicle?
 14 **A. No, I wasn't.**
 15 Q. You were simply focusing on the cab of the vehicle?
 16 **A. Yes, I was.**
 17 Q. When you got to the front nearside of the subject
 18 vehicle, you have been clear, haven't you, that the only
 19 occupants of the vehicle at that stage were the driver,
 20 and somebody at the back --
 21 **A. Yes.**
 22 Q. -- in the rear seat?
 23 **A. That is all I could see at that time.**
 24 Q. Yes.
 25 You only saw Mr Totton after you had deployed the CS

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1 into the vehicle, through the front nearside window?
 2 **A. Yes.**
 3 Q. He was outside the vehicle when you first saw him?
 4 **A. He was, yes.**
 5 Q. You deployed that CS through the front nearside window,
 6 that is to say the front passenger side window. If
 7 Mr Totton had been sitting in the front nearside seat,
 8 you would inevitably have seen him there, wouldn't you?
 9 **A. I would, yes.**
 10 Q. You would inevitably have been at the door when he got
 11 out, if that was the sequence?
 12 **A. Yes.**
 13 Q. He wasn't, was he?
 14 **A. Not that I recall, no.**
 15 Q. You couldn't have missed him?
 16 **A. No.**
 17 Q. As for Mr Grainger and his reaction to what you did, let
 18 me try to deal with that. Your sight of Mr Grainger
 19 was, to start with, with his hands down, correct?
 20 **A. Yes.**
 21 Q. What was your perception at that time of what the person
 22 in the rear of the car was doing?
 23 **A. They were just remaining in the car, they were seated in**
 24 **the car.**
 25 Q. Right. Did you know at the point at which you smashed

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1 the window and almost immediately put in the CSDC
 2 whether or not Mr Grainger was under control by
 3 officers, including those in the alpha vehicle?
 4 **A. I believed he was not under control.**
 5 Q. Right.
 6 No doubt the fact that you believed he was not under
 7 control by other officers, or did not know that he was
 8 under control, informed your judgment in deploying the
 9 CS?
 10 **A. That did have a part in it, yes.**
 11 Q. It then being a conventional situation where somebody is
 12 not under control, he or they have their hands down and
 13 the CSDC, as you were trained, could be used to achieve
 14 control in that context.
 15 **A. Yes.**
 16 Q. Am I right?
 17 **A. You are.**
 18 Q. Could you just go to tab 1 of the bundle -- it is just
 19 your statement, I want to ask you about the sequence
 20 here and a point at which Mr Grainger flinched. It may
 21 be thought to be common sense but I will deal with it
 22 anyway. It is tab 1, page 3 of your statement,
 23 paragraph 3. I will just read the whole paragraph for
 24 the record:
 25 "I then ran between the front of the bravo car and

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<p>1 the rear of the alpha car and made directly to the front 2 passenger window of the subject vehicle. I remained 3 focused on the nearside of the car and, without delay, 4 I smashed the passenger window and deployed the CS 5 canister into the vehicle. As I did so, I looked into 6 the car and saw one male in the rear of the vehicle and 7 the driver, Anthony Grainger, who upon the window 8 smashing appeared to me to raise his hands from below 9 the dashboard towards chest height. I believed either 10 through shock of being challenged or to capitulate." 11 My point there is that Mr Grainger's reaction, which 12 you described as a flinch yesterday -- 13 A. Yes. 14 Q. -- was, on the face of your statement, "Upon the window 15 smashing"? 16 A. Yes. 17 Q. Of course it may be thought to be common sense, but 18 someone smashing a window immediately to your left when 19 you are in a vehicle will produce a reaction 20 immediately. Won't it? 21 A. I would imagine so, yes. 22 Q. That is just an ordinary human response to that 23 stimulus? 24 A. Yes. 25 Q. Rather than there being no response to a smashed window</p> <p style="text-align: center;">Page 41</p>	<p>1 firearm, it is not something you heard? 2 A. It is not something I heard, no. 3 Q. You were asked questions, and it is in your statement, 4 again, bottom of page 3 of your statement. 5 A. Yes. 6 Q. I want to ask about the point at which officers are 7 shouting "He is shot" in relation to Mr Grainger. 8 Can I ask this first of all, when you smashed the 9 window, as you did, were you effectively side on to 10 Mr Grainger? 11 A. I don't recall. 12 Q. Right. Bottom of the page, page 3 of the your 13 statement: 14 "Once David Totton was secured ..." 15 By that, do we mean secured, handcuffed, under 16 control? 17 A. I believe that would be the case. 18 Q. "Once David Totton was secured, I turned and saw 19 Anthony Grainger being pulled out of the subject vehicle 20 via the front nearside passenger door. I then saw blood 21 on his chest and heard officers shout 'He is shot, he is 22 shot'. Recognising for the first time he was injured, 23 but was now needing first aid to be administered where 24 he lay next to David Totton, I moved David Totton away 25 from his current location."</p> <p style="text-align: center;">Page 43</p>
<p>1 and a delay and only responding to the CS gas filling 2 the car. 3 A. Yes. 4 Q. Do you agree, there is a common sense in that? 5 A. Yes. 6 Q. It is after that point isn't it that you have your 7 attention to Mr Totton already out of the car and not in 8 the car when you smash the window -- 9 A. That's correct. 10 Q. -- and you take steps with other officers to bring him 11 under control? 12 A. Yes. 13 Q. In your witness statements, and indeed in your evidence, 14 you have accounted for two shotgun rounds being 15 discharged in the course of these events. 16 A. Yes, I have. 17 Q. Distinctively shotgun rounds? 18 A. Yes. 19 Q. And only two in number? 20 A. Yes. 21 Q. You only heard two firearm rounds at the scene being 22 discharged? 23 A. I did, yes. 24 Q. That is all you remember? 25 If there was a third round discharged from any</p> <p style="text-align: center;">Page 42</p>	<p>1 The point at which you hear other officers shouting 2 "He is shot, he is shot" in relation to Mr Grainger, is 3 post Mr Totton being got under control? 4 A. Yes. 5 Q. But on any view it is as Mr Grainger is being removed 6 from the subject vehicle. That is the point at which 7 you hear it? 8 A. Yes. 9 Q. And not before. And you played no part in dealing with 10 Mr Grainger thereafter. 11 We have the picture, and it is also at page 169 of 12 the transcript, that having deployed the CS, page 169, 13 line 13, question from Mr Thomas: 14 "Did you see him move again?" 15 Your answer was: 16 "I didn't, because my attention was then diverted 17 immediately, as I have said, to Mr Totton who appeared 18 outside the vehicle. I deemed him to be more of 19 an immediate threat." 20 You deploy it, you look round, and there is Totton 21 outside the vehicle? 22 A. Yes. 23 MR DAVIES: Thank you. 24 THE CHAIRMAN: Yes, Ms Whyte. 25</p> <p style="text-align: center;">Page 44</p>

<p>1 Questions from MS WHYTE</p> <p>2 MS WHYTE: Officer, you cannot see me, you know my name is</p> <p>3 Anne Whyte and I'm asking questions on behalf of Greater</p> <p>4 Manchester Police.</p> <p>5 A. Yes.</p> <p>6 Q. I have three short matters that I would like to ask</p> <p>7 questions about, could you please turn to tab 22 in the</p> <p>8 general bundle and look at page 1267. This is the</p> <p>9 information and intelligence page of the PowerPoint</p> <p>10 briefing you attended on 3 March. Do you have that?</p> <p>11 A. Yes, I do.</p> <p>12 Q. Yesterday in answer to a question from Mr Beer about the</p> <p>13 second paragraph of that document, you said that you</p> <p>14 thought that the subjects might have been convicted of</p> <p>15 the robbery referred to in paragraph 2. Do you remember</p> <p>16 saying that?</p> <p>17 A. I do, yes.</p> <p>18 Q. Can you see that paragraph starts with the words, "There</p> <p>19 is intelligence to suggest ..."</p> <p>20 A. Yes.</p> <p>21 Q. Thinking about that, why would you think from that form</p> <p>22 of words that they might have been convicted?</p> <p>23 A. It is a generic term that often appears on our</p> <p>24 briefings.</p> <p>25 Q. Do you understand the difference between intelligence</p> <p style="text-align: center;">Page 45</p>	<p>1 a safe area and throw/dispose of that special munition</p> <p>2 into that area.</p> <p>3 Q. Finally, in relation to the post-incident procedures,</p> <p>4 can you recall by about 11.25/11.30 on the evening of</p> <p>5 3 March, Karl Thurogood, a fed rep, being present and</p> <p>6 involved?</p> <p>7 A. Yes, I can.</p> <p>8 Q. Was he also joined by another fed rep called</p> <p>9 Kieran Murray?</p> <p>10 A. That I can't recall. I certainly remember Mr Thurogood</p> <p>11 being there.</p> <p>12 Q. Do you remember whether or not by that stage at least</p> <p>13 two solicitors, a Mr Richard Black from RJW and</p> <p>14 a Mr Mike Mackie from Burton Copeland were also engaged</p> <p>15 with the process?</p> <p>16 A. I can't recall at what stage, if it was at that stage,</p> <p>17 that they were engaged in it. I certainly know the name</p> <p>18 Mr Mackie, I recognise the name, but I couldn't tell you</p> <p>19 at what stage they were involved in the process.</p> <p>20 Q. Can you recall at any time the information being</p> <p>21 provided that the solicitors were going to be resistant</p> <p>22 to individual accounts being provided at that stage?</p> <p>23 A. No, I can't recall. And my apologies again because it</p> <p>24 had been a long and by this stage traumatic day. Events</p> <p>25 did start to blur into one, I think it is safe to say,</p> <p style="text-align: center;">Page 47</p>
<p>1 and a conviction?</p> <p>2 A. Yes, I do.</p> <p>3 Q. Why, forgive me pressing you on that, would "There is</p> <p>4 intelligence ..." mean something equating to a possible</p> <p>5 or likely conviction, help us with that?</p> <p>6 A. I just took that to be the case.</p> <p>7 Q. Did anyone tell you that they had been convicted of that</p> <p>8 robbery?</p> <p>9 A. I don't recall.</p> <p>10 Q. If you don't use your CSDC but you have removed the pin,</p> <p>11 as we know you did on this occasion, what would you do?</p> <p>12 A. Sorry, can you just repeat the question?</p> <p>13 Q. Yes.</p> <p>14 THE CHAIRMAN: The question you were asked earlier, about</p> <p>15 what would you do if you have removed the pin.</p> <p>16 MS WHYTE: If you have removed the pin but you don't</p> <p>17 actually then deploy. Can you help us with the possible</p> <p>18 ways in which you deal with that?</p> <p>19 A. I would have dealt with it by way of what we term</p> <p>20 a ditching drill, which applies to any type of special</p> <p>21 munitions of that variety that make up, more especially</p> <p>22 it is used if you are using a stun grenade in a building</p> <p>23 or about to enter an area of threat and the stun grenade</p> <p>24 is no longer required. You would conduct the same</p> <p>25 drill, which is you would quickly look round, look for</p> <p style="text-align: center;">Page 46</p>	<p>1 at that point. So I can't recall specifically.</p> <p>2 THE CHAIRMAN: If that is the position, can it be</p> <p>3 established in another way?</p> <p>4 MS WHYTE: I will leave it there if the officer cannot</p> <p>5 recall.</p> <p>6 Thank you.</p> <p>7 THE CHAIRMAN: Mr Beer, anything further?</p> <p>8 MR BEER: Just three topics, sir, if I may.</p> <p>9 Further questions from MR BEER</p> <p>10 MR BEER: You were asked by Mr Weatherby founded on</p> <p>11 PowerPoint presentations from various dates. Can we</p> <p>12 compare the PowerPoint presentations that he showed you</p> <p>13 to your training record.</p> <p>14 A. Yes, if you like.</p> <p>15 Q. This means opening two bundles, he took you to the</p> <p>16 training package in tab 32 of the general file at</p> <p>17 page 3. Do you have that?</p> <p>18 A. Yes, I have, yes.</p> <p>19 Q. Can you see that it was the PowerPoint presentation that</p> <p>20 sat behind this cover sheet that he founded the majority</p> <p>21 of his questions on?</p> <p>22 A. Yes, it was, wasn't it, yes.</p> <p>23 Q. Yes.</p> <p>24 Can we see the course date at the top right of the</p> <p>25 document on page 3?</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 A. Yes.</p> <p>2 Q. In fact there are a number of course dates. It says,</p> <p>3 "Course date 11, 19 and 26 March 2010."</p> <p>4 A. Yes.</p> <p>5 Q. Can you see that?</p> <p>6 A. I can see that, yes.</p> <p>7 Q. If you can take out your own bundle, please, and look at</p> <p>8 tab 10.</p> <p>9 A. Yes, got that.</p> <p>10 Q. This is your training record. Turn to page 845.</p> <p>11 A. I've got that as well, yes.</p> <p>12 Q. Can you see in the middle of the hole-punches, "MASTS</p> <p>13 refresher training, 11 March 2010"?</p> <p>14 A. Yes, got that.</p> <p>15 Q. It seems that you went on MASTS refresher training on</p> <p>16 11 March 2010, yes, for 435 minutes. We have the</p> <p>17 training package for 11 March 2010 in our folder.</p> <p>18 A. Yes, that seems to be the case.</p> <p>19 Q. It would appear that you were trained in line with or by</p> <p>20 reference to the training package that Mr Weatherby</p> <p>21 showed you earlier?</p> <p>22 A. Yes, that seems to be the case, yes.</p> <p>23 Q. Can we then look at further MASTS training, to see</p> <p>24 whether the training that you attended differed by</p> <p>25 reference to the materials that GMP have given us. If</p> <p style="text-align: center;">Page 49</p>	<p>1 that we have the course records for the training package</p> <p>2 for the course that you attended then. If we go on,</p> <p>3 over the page in your bundle, to page 849, and look at</p> <p>4 17 March 2011. Can you see that was a one-day course,</p> <p>5 450 minutes, on 17 March 2011?</p> <p>6 A. Yes.</p> <p>7 Q. Then in the other bundle, at page 215 -- are you at 215?</p> <p>8 A. Getting there, yes.</p> <p>9 Q. Thank you. There appears to be a covert stop refresher</p> <p>10 course of March 2011, yes?</p> <p>11 A. Yes.</p> <p>12 Q. If you just look at the PowerPoint, it starts at 215,</p> <p>13 goes on to 216, and then goes on to 218 and then 221 and</p> <p>14 222. Is there anything different in there that you can</p> <p>15 see from what Mr Weatherby took you through earlier, by</p> <p>16 reference to the May 2010 course, the March 2010 course?</p> <p>17 A. No. Well other than the mention of the DADA on that</p> <p>18 one.</p> <p>19 Q. I am looking in particular at 221 and 222. The reasons</p> <p>20 I am asking you these questions, X9, is you said that</p> <p>21 although you accepted what Mr Weatherby was putting to</p> <p>22 you by reference to the March 2010 course --</p> <p>23 A. Yes.</p> <p>24 Q. -- you think things may have changed by the time you</p> <p>25 reached March 2012?</p> <p style="text-align: center;">Page 51</p>
<p>1 we go over the page to 847, in your training record, can</p> <p>2 you see the next reference to MASTS training is on</p> <p>3 24 May 2010, and it says "MASTS/DADA". D-A-D-A, is that</p> <p>4 a deadly and determined attack?</p> <p>5 A. Yes.</p> <p>6 Q. Yes, and it says, "Upskilling of MASTS officers". That</p> <p>7 is 24 May 2010.</p> <p>8 In the other bundle, can we turn to page 51.</p> <p>9 Can you see there again the front sheet for</p> <p>10 a package of materials, a MASTS conversion course</p> <p>11 from May 2010, yes?</p> <p>12 A. Yes, got that.</p> <p>13 Q. I am not sure that this is the same one for two reasons.</p> <p>14 Firstly, your training record says your course was</p> <p>15 for 1,980 minutes between 24 May and 28 May, which is</p> <p>16 a five-day course. This says that it is a two-day</p> <p>17 course?</p> <p>18 A. It does, doesn't it, yes.</p> <p>19 Q. Yes. This is entitled "MASTS conversion" and when you</p> <p>20 look at the contents it doesn't appear to deal with</p> <p>21 a deadly and determined attack?</p> <p>22 A. Yes, I have not looked at the contents but yes, I do</p> <p>23 accept that.</p> <p>24 Q. You accept that, okay.</p> <p>25 I am going to skip over that, because I'm not sure</p> <p style="text-align: center;">Page 50</p>	<p>1 A. I could be mistaken, but things have changed and evolved</p> <p>2 in relation to the MASTS tactic over the years so my</p> <p>3 recollection of where we were with which particular</p> <p>4 tactic at what time is again somewhat --</p> <p>5 Q. Yes, it is quite a difficult thing to remember, when</p> <p>6 things change. I am just looking at the course records</p> <p>7 or the training records to see --</p> <p>8 A. I can't dispute that.</p> <p>9 Q. I couldn't see anything in particular that had changed.</p> <p>10 Lastly before March 2012, I think the last MASTS</p> <p>11 refresher training, if you look on page 849, was on</p> <p>12 4 October 2011. Can you see that?</p> <p>13 A. Yes, I can.</p> <p>14 Q. I think we have the records for that too. That was</p> <p>15 a one-day course, if you go to page 245 in the bundle --</p> <p>16 A. Yes, got that.</p> <p>17 Q. -- this appears to be the training package for</p> <p>18 November 2011, yes. So it matches your training record.</p> <p>19 And again I think the PowerPoint starts at 255 --</p> <p>20 A. Yes.</p> <p>21 Q. -- and roles are set out at 261 and 262.</p> <p>22 A. Yes, got that.</p> <p>23 Q. Then at 264 and 265, they are quite difficult to</p> <p>24 understand what is going on with them, it may be that</p> <p>25 these were moving pictures on the PowerPoint. They are</p> <p style="text-align: center;">Page 52</p>

13 (Pages 49 to 52)

1 certainly not as easy to understand as the March 2010
 2 course notes.
 3 **A. No.**
 4 Q. But I suppose you are not going to be able to help us,
 5 not through any fault of your own, by knowing whether
 6 what you were told on this refresher, March 2011,
 7 differed in any way from the PowerPoints that
 8 Mr Weatherby took you to?
 9 **A. No, I can't tell you unfortunately. I am sorry.**
 10 Q. Okay.
 11 **A. It appears to be the same, yes.**
 12 Q. On the basis of the documents we have looked at, there
 13 doesn't appear to be a significant change in the course
 14 notes in any event between what Mr Weatherby took you to
 15 and what happened subsequently before March 2012?
 16 **A. No, I agree.**
 17 Q. Thank you. That was the first topic.
 18 The second topic, please, is post-incident statement
 19 making. I wonder whether you could take open the
 20 policies and procedures bundle, please. I think you may
 21 need some assistance finding that.
 22 At page 383, please, they are in red numbered at the
 23 top right.
 24 **A. Sorry, 300?**
 25 Q. 383.

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1 **A. Yes, got that page.**
 2 Q. This is part of the manual of guidance, the operative
 3 edition by March 2012. I suspect you were not familiar
 4 with every line of it?
 5 **A. No, I wasn't.**
 6 Q. No. I am not asking you questions to test your
 7 familiarity with it. I just want to see whether the
 8 things that it says that should be done occurred in this
 9 case, in Operation Shire after the discharge of the
 10 firearm?
 11 **A. I understand.**
 12 Q. Do you understand?
 13 Under the heading "Providing accounts", it sets out
 14 in some stages the things that should be done or gives
 15 guidance on the things that should be done or not done.
 16 At stage one can you see "Situation report" it says:
 17 "The TFC or force control room must immediately be
 18 informed ..."
 19 I am not going to ask questions about that, that is
 20 a different issue.
 21 Then stage two:
 22 "Post-incident manager, PIM, basic facts."
 23 At 7.9.4:
 24 "The PIM is responsible for establishing the basic
 25 facts of what happened. Where possible this information

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1 should come from a source other than a principal
 2 officer. This is most likely to take place at the
 3 nominated post-incident location where the basic facts
 4 will be provided by an individual who is willing to
 5 provide them. The basic facts will be provided, subject
 6 to legal advice where appropriate, in verbal or written
 7 format. A staff association representative may also be
 8 present. It may be appropriate for the PIM to advise
 9 all of those present of the need to maintain anonymity.
 10 The basic facts obtained by the PIM should where
 11 possible be sufficient to confirm which officers were at
 12 the scene, describe in brief the roles of those at the
 13 scene, confirm who discharged their weapon.
 14 "The basic facts recorded or received by PIM should
 15 be confirmed with the person providing them to certify
 16 accuracy and should be timed, dated and signed by the
 17 PIM."
 18 Then it continues.
 19 As far as you are aware, in the post-incident
 20 procedure that took place, did that occur?
 21 **A. No. As far as I am aware -- I was asked about this**
 22 **recently, asked the same question, was I aware of, had**
 23 **I provided an account and did I know who it was with and**
 24 **et cetera, and I was unable to say that I had done that.**
 25 **Again, I can't recall.**

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1 Q. You cannot recall whether you were asked to provide
 2 basic facts?
 3 **A. No, I can't recall. That was obviously -- obviously**
 4 **that is the sequence of events as outlined there, but I**
 5 **can't recall that being done.**
 6 Q. Okay.
 7 The firearms officers collected together, didn't
 8 they at a location?
 9 **A. Yes.**
 10 Q. Where was that?
 11 **A. It was at Claytonbrook.**
 12 Q. Was that in one room?
 13 **A. It was, yes.**
 14 Q. Did that include Q9?
 15 **A. Yes, it did.**
 16 Q. When you got into the room, how long were you there for
 17 before you left?
 18 **A. An age, it would seem. A long time.**
 19 Q. Yes. Four or five hours, eight hours?
 20 **A. Somewhere in the four- or five-hour region, I would**
 21 **suggest.**
 22 Q. When you were in the room there, were you aware of
 23 anyone else providing an account to the PIM along the
 24 lines we have just read there?
 25 **A. No, again I am sorry, I can't recollect exactly what**

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1 **occurred in there.**
 2 Q. Okay. If we go on to paragraph 7.9.6, it says:
 3 "Stage 3, personal initial accounts. Subject to
 4 legal and medical advice officers should provide
 5 a personal initial account of the incident before going
 6 off duty. Each officer's initial account should consist
 7 only of their individual recollection of events and
 8 should be written, signed and dated. Detailed accounts
 9 will be made later.
 10 "The personal initial account is to record their
 11 role, what they believed to be the essential facts and
 12 should, where relevant, outline their honestly held
 13 belief that resulted in their use of force."
 14 Then it continues. You I don't think did that, did
 15 you, provided a personal initial account?
 16 **A. No, I don't believe I did, and I don't recall doing that**
 17 **either.**
 18 Q. You cannot recall whether that was because of legal
 19 advice or not?
 20 **A. No. Unfortunately.**
 21 Q. Okay. Then stage 4:
 22 "Detailed accounts should not normally be obtained
 23 immediately. They can be left until the officers
 24 involved in the shooting are better able to articulate
 25 their experience in a coherent format, usually after at

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1 least 48 hours. The detailed account should include if
 2 relevant why the witness considered the use of force and
 3 discharge of firearms to be absolutely necessary."
 4 Then if we just carry on, skip over the page,
 5 please. 7.9.9:
 6 "As a matter of general practice, officers should
 7 not confer with other witnesses before making their
 8 accounts, whether initial or subsequent accounts. The
 9 important issue is to individually record what their
 10 honestly held belief of the situation was at the time
 11 that force was used. There should therefore be no need
 12 for an officer to confer with others about what was in
 13 their mind at the time that force was used. If however
 14 in a particular case a need to confer on other issues
 15 does arise then in order to maintain transparency and to
 16 maintain public confidence, where some discussion has
 17 taken place officers must document the fact that this
 18 has taken place highlighting ..."
 19 Then the four things that are set out.
 20 When you were in the room for what seemed like
 21 an age, did officers speak about what had happened?
 22 **A. No, I don't believe they did.**
 23 Q. Did nobody want to know why Q9 had discharged his
 24 weapon?
 25 **A. We had a number of other officers present, as I said.**

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1 **And I think somebody identified themselves as**
 2 **a post-incident manager, we had the federation there,**
 3 **a number of people. And I think the primary concern was**
 4 **the welfare of the officers and that took the form of**
 5 **getting people food et cetera and waiting for the**
 6 **procedure that was going to be put in place, whereby we**
 7 **would unload our weapons, under video footage, that kind**
 8 **of thing. So we were waiting for all that, that was all**
 9 **taking place but I am not aware of any specific**
 10 **conversations or being asked to provide any initial**
 11 **account.**
 12 Q. Did, before you went off duty that night, you hear from
 13 Q9 himself why he had fired his gun?
 14 **A. No, I have never asked him.**
 15 Q. You still to this day don't know why --
 16 **A. I have never asked him that. He has obviously made**
 17 **a decision based on his threat assessment.**
 18 Q. Did you hear any conversation in the course of the, what
 19 seemed like an age, as to why Q9 had fired his gun?
 20 **A. No, I don't recall.**
 21 MR BEER: Thank you very much.
 22 THE CHAIRMAN: Thank you.
 23 MR BEER: Sir, those are the questions I ask.
 24 THE CHAIRMAN: Thank you. We have been going for nearly
 25 an hour and a half, so I think we should take a break at

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1 this stage.
 2 Just wait there for a second, X9, and Mrs Shaw will
 3 come and escort you away?
 4 **A. Thank you.**
 5 THE CHAIRMAN: 12.05.
 6 (12.00 pm)
 7 (A short adjournment)
 8 (12.10 pm)
 9 THE CHAIRMAN: Mr Beer, Ms Whyte -- there you are.
 10 MS WHYTE: Yes, sir.
 11 THE CHAIRMAN: I am afraid I had no questions for the last
 12 witness. I intended, but simply forgot, formally to
 13 release him and also to thank him for providing
 14 assistance to the Inquiry. That was just an oversight
 15 on my part, no discourtesy was intended. If you feel it
 16 would be appropriate, Ms Whyte, I wonder whether you
 17 could arrange for somebody to convey my apologies to the
 18 witness and my thanks.
 19 MS WHYTE: It is certainly not necessary, but we will of
 20 course do that.
 21 THE CHAIRMAN: Thank you very much.
 22 MR BEER: Sir, U2, please.
 23 THE CHAIRMAN: Thank you.
 24
 25

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<p>1 U2 (sworn)</p> <p>2 THE CHAIRMAN: Thank you, U2. I think you may be there for</p> <p>3 some time. I am not going to ask you to sit down, the</p> <p>4 reason for that is simply that it is difficult to manage</p> <p>5 files if you do so, it would become harder to hear you</p> <p>6 and it may also mean that some people who are entitled</p> <p>7 to see you cannot. I am afraid I must ask you to stand.</p> <p>8 A. Yes, that is fine.</p> <p>9 THE CHAIRMAN: If you find yourself needing a break, please</p> <p>10 just let me know.</p> <p>11 A. Thank you.</p> <p>12 Questions from MR BEER</p> <p>13 MR BEER: U2, my name is Jason Beer and I ask questions on</p> <p>14 behalf of the Inquiry. On your left-hand side there</p> <p>15 should be underneath those sheets of paper a cypher</p> <p>16 sheet. If you just put that on top and leave it open.</p> <p>17 You will see on there that there are the names of some</p> <p>18 people who, like you, benefit from orders of anonymity.</p> <p>19 If you wish to refer to them, please use their cypher</p> <p>20 not their real name.</p> <p>21 A. Okay.</p> <p>22 Q. Thank you. In front of you there should be a bundle in</p> <p>23 which there are contained a number of witness</p> <p>24 statements, I am going to ask you about four of them.</p> <p>25 In tab 1, please, if you can turn it up, there is</p> <p style="text-align: center;">Page 61</p>	<p>1 Q. After September 2003 but before March 2012, did you</p> <p>2 become trained in MASTS?</p> <p>3 A. Yes.</p> <p>4 Q. Can you remember when that was?</p> <p>5 A. Yes, it was the beginning of 2004. May time, I think it</p> <p>6 was, 2004.</p> <p>7 Q. Between 2004 and 2012, did you undergo periodic</p> <p>8 refresher training in the MASTS?</p> <p>9 A. Yes, regular refresher training.</p> <p>10 Q. Did that initial and refresher training include vehicle</p> <p>11 stops?</p> <p>12 A. Yes.</p> <p>13 Q. We have heard from some witnesses already, other AFOs,</p> <p>14 about a distinction between what might be described as</p> <p>15 orthodox or conventional vehicle stops and unorthodox or</p> <p>16 unconventional stops. Are you aware of that</p> <p>17 distinction?</p> <p>18 A. It is not the terms I would use but, yes, I am aware of</p> <p>19 what that means.</p> <p>20 Q. What language would you use to distinguish between the</p> <p>21 two things that I have described?</p> <p>22 A. "On a road" or "off a road".</p> <p>23 Q. You wouldn't call them "conventional" or</p> <p>24 "unconventional"?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 63</p>
<p>1 a witness statement in your name dated 9 March 2012. Is</p> <p>2 that right?</p> <p>3 A. Yes.</p> <p>4 Q. Then in tab 2, a witness statement dated 18 May 2012.</p> <p>5 A. Yes.</p> <p>6 Q. In tab 3, a witness statement dated 11 September 2012.</p> <p>7 A. Yes.</p> <p>8 Q. Then I am going to skip to tab 7, please, a witness</p> <p>9 statement dated 8 September 2014.</p> <p>10 A. Yes.</p> <p>11 Q. Are the contents of those four witness statements true</p> <p>12 to the best of your knowledge and belief?</p> <p>13 A. Yes, they are.</p> <p>14 Q. Thank you.</p> <p>15 In terms of your background, when did you join the</p> <p>16 police service?</p> <p>17 A. April 2000.</p> <p>18 Q. Are you still serving?</p> <p>19 A. Yes, I am.</p> <p>20 Q. Is that in the GMP area or a different police area?</p> <p>21 A. The Greater Manchester Police area.</p> <p>22 Q. In March 2012, what was your rank?</p> <p>23 A. Constable.</p> <p>24 Q. When did you first become an AFO?</p> <p>25 A. September 2003 I qualified as a basic AFO.</p> <p style="text-align: center;">Page 62</p>	<p>1 Q. We have seen some training records that use the phrase</p> <p>2 "conventional" and "unconventional", why would you use</p> <p>3 different terminology than that which the training</p> <p>4 suggests would be used?</p> <p>5 A. I think the basis of a MASTS platform is to be flexible,</p> <p>6 it allows flexibility and although we do practice what</p> <p>7 you would term of coming up from behind a vehicle, in my</p> <p>8 experience, which is reasonably extensive, that is very,</p> <p>9 very few and far between what you would call</p> <p>10 conventional. In fact it is more often than not in my</p> <p>11 experience it would be unconventional to use your</p> <p>12 terminology.</p> <p>13 Q. It is not mine, it is GMP's.</p> <p>14 A. GMP's, yes.</p> <p>15 Q. What I am, borrowing GMP's language, calling</p> <p>16 an unconventional vehicle strike, included according to</p> <p>17 the training records a strike on a parked car in a car</p> <p>18 park. Would that fall into your category of off a road?</p> <p>19 A. Yes.</p> <p>20 Q. What, if any, particular challenges did that type of</p> <p>21 strike pose?</p> <p>22 A. In this particular occasion --</p> <p>23 Q. I am not talking about this one, I am talking about</p> <p>24 generally.</p> <p>25 A. It is generally the geographic area, ie sometimes they</p> <p style="text-align: center;">Page 64</p>

1 are in a particular position that may be quite tight
 2 against another feature, whether it be a building or
 3 another vehicle. So, you know, sometimes it is just
 4 about the geography around the actual vehicle itself
 5 presents, sometimes presents an issue.
 6 Q. Was that type of strike something that was practised in
 7 training?
 8 A. Yes.
 9 Q. With what frequency?
 10 A. From memory, regularly. We would practice all manner of
 11 scenarios, including parked cars, nose in, nose out, in
 12 the centre of a car park.
 13 Q. As regularly as you would practice what GMP describe as
 14 conventional vehicle strikes, namely on a road, in
 15 a two-car or three-car vehicle stop?
 16 A. Yes, it would be practised amongst -- on a refresher
 17 session it would be practised in line with, we would
 18 perhaps go through a few conventional and then a few
 19 unconventional to give clarity.
 20 Q. There wasn't really any distinction between them as
 21 being conventional or unconventional, they were just in
 22 different places?
 23 A. It is just my understanding of it, I didn't see -- it is
 24 just a tactical problem whether it is on the road or in
 25 a car park.

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1 Q. There wasn't any focus on any particular type of strike,
 2 ie one was weighted and therefore trained more often
 3 because it was thought to be the more likely or the
 4 preferred option?
 5 A. No, not from my recollection. It is -- essentially the
 6 vehicle has to be contained whether that is with one
 7 vehicle, two or three vehicles, then what that actually
 8 looks like on the ground would be very unique to the
 9 particular circumstances of any particular intervention.
 10 Q. You mentioned I think there that the non or
 11 unconventional, as I am describing it, stop or strike on
 12 a vehicle would include a stop which was nose on. By
 13 that do you mean the police car came nose on to the nose
 14 of the subject car?
 15 A. I have had operational experience of such a stop, yes.
 16 Q. I am talking about training at the moment.
 17 A. Yes. Yes.
 18 Q. You had actually done it on the ground as well, in
 19 a real operation?
 20 A. On operations, yes.
 21 Q. And also side on?
 22 A. Yes.
 23 Q. Were you trained in the use of special munitions?
 24 A. Yes.
 25 Q. Which special munitions?

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1 A. Shotgun-discharged Hatton round, or RAM round, for
 2 deflation of tyres, RIP for delivery of CS munitions and
 3 CSDC.
 4 Q. What document or documents, if any, would be your
 5 reference points for how your behaviour would be
 6 regulated in relation to each of those?
 7 A. Well, the manual of guidance, the training courses that
 8 I received in each of those delivery methods, and then
 9 obviously standard operating procedures for our
 10 particular department.
 11 Q. You say obviously the standard operating procedures, are
 12 they documents that you would have possession of
 13 yourself, an SOP?
 14 A. No, they are made available on our computer systems and
 15 there are hard copies available. You would be made
 16 aware of the SOP for a particular element of training,
 17 whether it be a tactic or whether it be a delivery of
 18 a munition or a training in a particular firearm. And
 19 then you would be refreshed if those SOPs changed, but
 20 I wouldn't consult it on a regular basis if that is ...
 21 Q. It was on an intranet system as a resource that you
 22 could consult if you wished?
 23 A. Yes.
 24 Q. By March 2012, with what frequency had you been deployed
 25 on operations where MASTS had been the authorised

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1 "tactic"?
 2 A. I could only say dozens, dozens and dozens. I obviously
 3 don't keep track of the particular number. Are you
 4 referring to actual deployments on to where it has
 5 become a tactical overt option or whether I have been
 6 assigned to a role?
 7 Q. No, I am using it in the language of the manual of
 8 guidance. A deployment meaning one in which a SFC has
 9 granted authority for firearms to be carried by --
 10 A. Dozens of those.
 11 Q. Dozens and dozens?
 12 A. Yes.
 13 Q. Was it the most frequently, in your experience, used
 14 tactical option?
 15 A. For my particular role at the time in the operations
 16 team, it was the platform which a number of other
 17 tactical options could have been delivered from, ie on
 18 to a building, on to a subject on foot and on to
 19 a vehicle. So in that sense, yes, it would be the
 20 preferred option, if you like, just for the flexibility.
 21 Q. Of those deployments, in the sense that I have used it,
 22 how many of them had resulted in overt action?
 23 A. Again, I don't know the number but a significant amount
 24 of operations, obviously had a resolution, we may run on
 25 it a number of times, as we did in this case, but

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<p>1 I couldn't particularly give you a figure.</p> <p>2 Q. Still in the dozens?</p> <p>3 A. I would probably -- yes, at least a dozen.</p> <p>4 Q. What was your understanding of the MASTS tactic? What</p> <p>5 is it?</p> <p>6 A. The MASTS tactic is an ability for an arrest team that</p> <p>7 is armed to support a surveillance team who are watching</p> <p>8 subjects of a -- some sort of criminal activity. And</p> <p>9 provide that arrest capability in the -- for the</p> <p>10 surveillance and for the SIO for a particular operation.</p> <p>11 Q. You mention there that they are an arrest team --</p> <p>12 A. Hmm.</p> <p>13 Q. -- and can provide a capability in the event that</p> <p>14 an arrest is necessary.</p> <p>15 A. Yes.</p> <p>16 Q. Was it your understanding that the MASTS tactic had as</p> <p>17 its focus arrest, in the event that an arrest was</p> <p>18 decided to be necessary?</p> <p>19 A. Yes, we work under a series of conditions, or states,</p> <p>20 condition Amber or State Amber would be given at some</p> <p>21 point throughout an operation, if it was deemed that the</p> <p>22 subjects of an operation had or there was a sufficiency</p> <p>23 of evidence to arrest the subjects for a particular</p> <p>24 offence, that would be given to us over the air, so we</p> <p>25 were there for that sole purpose if you like, and to</p> <p style="text-align: center;">Page 69</p>	<p>1 Q. Before Operation Shire began, had you any previous</p> <p>2 knowledge of or experience of David Totton?</p> <p>3 A. I was aware of him, his name.</p> <p>4 Q. In what context were you aware of him and his name?</p> <p>5 A. He was a well-known Salford criminal.</p> <p>6 Q. In what context had you come to gain that opinion of</p> <p>7 him?</p> <p>8 A. Just through the usual sort of updates, intelligence</p> <p>9 briefings that we have, both on ARV briefings and also</p> <p>10 as an operations team. He was well known to -- of</p> <p>11 surviving an attempt on his life in a public house in</p> <p>12 Salford, where the --</p> <p>13 Q. In the Brass Handles?</p> <p>14 A. Yes, where the offenders were shot dead. So he was --</p> <p>15 "notorious" is probably not the best word, but that is</p> <p>16 most appropriate I think.</p> <p>17 Q. Notorious not the best word but the most appropriate?</p> <p>18 A. The most appropriate, yes. He was very, very well known</p> <p>19 and he was a significant figure in the -- in my</p> <p>20 perception as a criminal in Salford.</p> <p>21 Q. What type of crime?</p> <p>22 A. Armed robbery, drug distribution and sort of gang,</p> <p>23 general gang activity.</p> <p>24 Q. The same question in relation to Mr Rimmer, please.</p> <p>25 A. I wasn't really aware of Mr Rimmer, from memory.</p> <p style="text-align: center;">Page 71</p>
<p>1 protect the surveillance assets that may be supporting</p> <p>2 an operation on the ground who are unarmed.</p> <p>3 Q. The title of the tactic, MASTS, tends to suggest that it</p> <p>4 is to support surveillance?</p> <p>5 A. Correct.</p> <p>6 Q. Yes?</p> <p>7 A. Yes.</p> <p>8 Q. Rather than to be there in the event that an arrest is</p> <p>9 necessary?</p> <p>10 A. It is the arrest -- it is an arrest option and to</p> <p>11 protect the surveillance team. You are supporting</p> <p>12 a surveillance operation in an arrest capacity. That is</p> <p>13 my understanding of the tactic.</p> <p>14 Q. You didn't understand it to be, as its primary function,</p> <p>15 support to surveillance, simpliciter stop?</p> <p>16 A. No, it is not as simple as that. There are occasions</p> <p>17 where we would support surveillance for certain roles</p> <p>18 that they may carry out for an operation, which are</p> <p>19 probably not appropriate to go into in this court,</p> <p>20 however, where there is not an arrest plan in place.</p> <p>21 However, they are quite infrequent.</p> <p>22 Q. By March 2012, did you consider yourself to be</p> <p>23 occupationally and operationally competent as an AFO, on</p> <p>24 a MASTS operation?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 70</p>	<p>1 Q. The same question in relation to Mr Grainger?</p> <p>2 A. Anthony Grainger, I was not aware of him but I was aware</p> <p>3 of his brother's involvement in, I believe in a murder,</p> <p>4 which he was currently in prison for at the time.</p> <p>5 Q. You didn't know that Anthony Grainger was the brother of</p> <p>6 Stuart Grainger?</p> <p>7 A. I was aware that they were brothers.</p> <p>8 Q. You were?</p> <p>9 A. Yes, I was aware that they were brothers.</p> <p>10 Q. But you didn't know anything about Mr Grainger himself?</p> <p>11 A. I had not had any dealings with him or -- there was no</p> <p>12 significant knowledge of him at the time.</p> <p>13 Q. Do you recall being involved in an operation called</p> <p>14 Operation Blythe?</p> <p>15 A. No.</p> <p>16 Q. Can you recall your first involvement in</p> <p>17 Operation Shire?</p> <p>18 A. I think it was pre-Christmas, there was one posting, if</p> <p>19 you like, where I was part of the MASTS deployment but</p> <p>20 on that occasion we didn't --</p> <p>21 Q. I think there were three before Christmas actually, 14,</p> <p>22 15 and 21 December.</p> <p>23 A. Yes, I think mine was the sort of mid December, and then</p> <p>24 I, obviously 2 and 3 March.</p> <p>25 Q. You think you only attended on one?</p> <p style="text-align: center;">Page 72</p>

1 **A. Yes, from memory.**
 2 Q. Just look at your bundle, please, which is in front of
 3 you there. Have a look, please, at tab 2.
 4 THE CHAIRMAN: Could you just pause a moment, Mr Beer?
 5 It is possible that the connection for the
 6 video-link has gone. That is why I have interrupted.
 7 I am sorry about that. I am going to ask for that to be
 8 checked.
 9 I am afraid it is going to be necessary for me to
 10 rise. I think we should do it now, as soon as I have
 11 become aware of the problem, rather than wait.
 12 MR BEER: We will just wait for U2 to be removed.
 13 THE CHAIRMAN: Yes.
 14 We will check the connection, if necessary reinstate
 15 it.
 16 MR BEER: Thank you, sir.
 17 (12.31 pm)
 18 (The Luncheon Adjournment)
 19 (1.52 pm)
 20 THE CHAIRMAN: Yes, Mr Beer.
 21 MR BEER: Sir, thank you.
 22 THE CHAIRMAN: The link is up and working now, as I can see.
 23 MR BEER: Yes.
 24 U2, I was asking you about your first involvement in
 25 Operation Shire. I think you said there was an occasion

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1 before Christmas when you were deployed on
 2 Operation Shire.
 3 **A. Yes.**
 4 Q. I was about to take you to tab 2 in the bundle, to your
 5 witness statement of 18 May, and the second page of it.
 6 The last paragraph. Can you see you say:
 7 "I have deployed on Operation Shire on the following
 8 occasions prior to 3 March, 14, 15, 21 December 2011."
 9 **A. Yes, that's correct.**
 10 Q. So that was where I was obtaining the information from,
 11 that you had been deployed before Christmas on more than
 12 one occasion.
 13 Is what you said in the witness statement there
 14 correct?
 15 **A. Yes, it is, yes.**
 16 Q. Do you know from where you obtained that?
 17 **A. I would assume -- I could only assume that it is from**
 18 **information that is provided to me. I don't remember**
 19 **particularly where that was from.**
 20 Q. Do you know whether you went back and consulted any
 21 briefings, ie either the PowerPoints or the recordings
 22 of the briefings on each of those three days?
 23 **A. I don't remember.**
 24 Q. Would there be any other source of information for your
 25 attendance on those three days?

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1 **A. No, other than a roll call on a recorded briefing, that**
 2 **would be the only source.**
 3 Q. Can you keep your voice up, please?
 4 **A. Yes, of course, yes. It is only on a recording from**
 5 **a briefing or on the PowerPoint presentation, which has**
 6 **a roll call at the beginning. So I'd have to --**
 7 Q. The reason for asking is that we have been told that for
 8 some of these days, neither a roll call nor a PowerPoint
 9 exists. I was trying to work out whether it did exist
 10 in May 2012 when you made this witness statement, but
 11 has since been destroyed or lost.
 12 **A. No, no, I couldn't answer that question.**
 13 Q. No, so you think you probably accessed the PowerPoint or
 14 the recording to check that you were present on those
 15 three occasions?
 16 **A. Possibly.**
 17 Q. We know, and we have the recordings showing that you
 18 were present, that you were present for the briefings on
 19 2 March and 3 March 2012, yes?
 20 **A. Yes.**
 21 Q. To what extent did you take into account the
 22 intelligence case that had been presented to you on the
 23 three December occasions when you were deploying two and
 24 a half months or so later at the beginning of March?
 25 **A. I can't recall whether I took that into consideration or**

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1 **not. I generally deal with what is presented to me at**
 2 **the time.**
 3 Q. Presumably this is quite a recurrent theme where you are
 4 deployed more than once on the same operation?
 5 **A. Yes. It is unusual to have such a big gap in between**
 6 **deployments, it is generally day after day, but yes, it**
 7 **is not uncommon.**
 8 Q. Were you indicating there that your approach is to take
 9 into account and only to take into account that which
 10 you are briefed on that day?
 11 **A. Yes.**
 12 Q. Is that because the intelligence case may have changed
 13 from the previous occasion?
 14 **A. Yes, indeed.**
 15 Q. In briefings, not talking about Operation Shire
 16 specifically now but generally, are you by words or by
 17 use of the 5x5 system given an assessment of the
 18 intelligence case that is being put to you?
 19 **A. During a briefing?**
 20 Q. Yes.
 21 **A. We are presented with the intelligence in relation to**
 22 **those particular subjects or that particular scenario at**
 23 **the time, it is not broken down using the 5x5, that is**
 24 **not something that I am particularly familiar with**
 25 **although I am aware it exists. It is the information**

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<p>1 and intelligence is given at the beginning of a briefing</p> <p>2 and that is the information that I have at the time for</p> <p>3 that particular operation.</p> <p>4 Q. They don't -- those doing the briefing, either the TFC</p> <p>5 or the OFC -- use the 5x5 system when they are briefing</p> <p>6 you, usually?</p> <p>7 A. I have not -- I can't recall that being used verbally</p> <p>8 or, you know, on the briefing.</p> <p>9 Q. Do they, in your experience, ever use words to</p> <p>10 differentiate between an assessment of the reliability</p> <p>11 and accuracy of the intelligence?</p> <p>12 A. Sorry, you are going to have to explain that in</p> <p>13 a slightly different way. I don't quite understand what</p> <p>14 you mean.</p> <p>15 Q. The 5x5 system is a national system that police officers</p> <p>16 are meant to know --</p> <p>17 A. Yes.</p> <p>18 Q. -- using B25 or whatever.</p> <p>19 A. Yes.</p> <p>20 Q. Another way of doing it might be:</p> <p>21 "We have reliable intelligence that ...</p> <p>22 "We have unsourced intelligence that ...</p> <p>23 "We have some information that we haven't been able</p> <p>24 to corroborate that ..."</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 77</p>	<p>1 A. Yes.</p> <p>2 Q. By 2 and 3 March, were you aware that Operation Shire</p> <p>3 had been split into two strands and so the subjects that</p> <p>4 you were briefed about in December were not those that</p> <p>5 you were being briefed about in March?</p> <p>6 A. I wasn't aware of the split.</p> <p>7 Q. Coming to March 2012 then, we are considering mainly the</p> <p>8 Friday and the Saturday.</p> <p>9 Do you in fact remember doing anything on the</p> <p>10 Thursday, Thursday, 1 March?</p> <p>11 A. Forgive me, I don't remember anything in relation to the</p> <p>12 days beforehand.</p> <p>13 Q. X7, the operational firearms commander has given</p> <p>14 a witness statement to the Inquiry that says on</p> <p>15 Thursday, 1 March he was contacted by the SIO,</p> <p>16 DI Cousen, and at about 11.00 in the morning, as</p> <p>17 a result of what he said, he, together with W4, H9 and</p> <p>18 you, went to Culcheth town centre on a reconnoitre. Did</p> <p>19 you do that?</p> <p>20 A. I don't recall it but, forgive me, it is a number of</p> <p>21 years ago, but it wouldn't be unusual to provide some</p> <p>22 sort of recce of any proposed area where criminality</p> <p>23 might take place.</p> <p>24 Q. He says that the four of you went there to reconnoitre</p> <p>25 a number of financial institutions. If you don't</p> <p style="text-align: center;">Page 79</p>
<p>1 Q. "We have some information that is potentially very</p> <p>2 unreliable that ...</p> <p>3 "We have excellent intelligence that ..."</p> <p>4 Using words to describe the assessment of the</p> <p>5 intelligence.</p> <p>6 A. Yes, that would be what I am more familiar with.</p> <p>7 Q. Right. Would that represent the norm, that some</p> <p>8 descriptor, some word was used to describe the</p> <p>9 assessment of the intelligence?</p> <p>10 A. It would vary from TFC to TFC in terms of how</p> <p>11 descriptive they were regarding the intelligence that</p> <p>12 they presented as part of the briefing.</p> <p>13 Q. It would just vary from TFC to TFC?</p> <p>14 A. I would imagine if there was something particularly</p> <p>15 relevant, ie some very, very serious information that we</p> <p>16 needed to be aware of which was relevant to the</p> <p>17 operation, we would be told the context of that</p> <p>18 information or intelligence, and would, you know -- not</p> <p>19 potentially where it has come from but certainly how</p> <p>20 credible it is, whether it be police observations or</p> <p>21 otherwise.</p> <p>22 Q. In the absence of such descriptions of the intelligence,</p> <p>23 how did you treat intelligence that was provided to you?</p> <p>24 A. On face value.</p> <p>25 Q. Does that mean you treated it as established fact?</p> <p style="text-align: center;">Page 78</p>	<p>1 remember it, it is no good me asking you which financial</p> <p>2 institutions you looked at.</p> <p>3 A. No.</p> <p>4 Q. Nor why the focus was on financial institutions?</p> <p>5 A. Well, other than I would imagine the fact that it was</p> <p>6 an armed robbery team that we were looking at, so that</p> <p>7 would be a natural target for such a team.</p> <p>8 Q. Indeed.</p> <p>9 On 2 March 2012, I think you were present at</p> <p>10 a briefing given by Chief Inspector Lawler and X7 at</p> <p>11 about 1.00 am in the morning.</p> <p>12 A. Sorry, could you just repeat the date, sorry, again?</p> <p>13 Q. 2 March, 1.00 am in the morning.</p> <p>14 A. Yes.</p> <p>15 Q. If we look, please, at tab 20, of the general bundle, so</p> <p>16 that is the second bundle of firearms officers.</p> <p>17 THE CHAIRMAN: Yes, it is the second one. That's right.</p> <p>18 A. Yes, I have that.</p> <p>19 MR BEER: This is a copy of the PowerPoint presentation,</p> <p>20 that we are told was displayed in the course of that</p> <p>21 briefing. Do you now remember attending it five years</p> <p>22 on or not?</p> <p>23 A. No.</p> <p>24 Q. What is your memory like of the events of 2 and 3 March?</p> <p>25 A. All I can remember is that we didn't actually leave the</p> <p style="text-align: center;">Page 80</p>

<p>1 unit, we didn't -- I don't remember deploying anywhere</p> <p>2 or holding anywhere, but I don't remember even part of</p> <p>3 the briefing to be perfectly frank.</p> <p>4 Q. Okay. Since then, in particular recently, have you</p> <p>5 looked at these kind of documents, this PowerPoint and</p> <p>6 the transcript?</p> <p>7 A. Yes, I have looked at the fact that I was obviously</p> <p>8 listed on the roll call if you like. I have not read</p> <p>9 the transcript.</p> <p>10 Q. Yes. You have not read the transcript of the briefing?</p> <p>11 A. Of that briefing, no.</p> <p>12 Q. Have you looked at the transcripts of the Inquiry?</p> <p>13 A. Yes.</p> <p>14 Q. If we look at the second page, I think we can see what</p> <p>15 you have previously looked at, then, page 447. I think</p> <p>16 we can see your name listed as being present?</p> <p>17 A. Yes.</p> <p>18 Q. Indeed if we go forward to tab 21, page 1175, we can see</p> <p>19 that you called out your name?</p> <p>20 A. Yes.</p> <p>21 Q. Yes?</p> <p>22 If you look at what I think Mr Lawler said at 1176,</p> <p>23 do you see the main or principal box there, and that the</p> <p>24 last paragraph of it. He says:</p> <p>25 "Er, before we go into the threat assessment, we all</p> <p style="text-align: center;">Page 81</p>	<p>1 behaviour, not on intelligence.</p> <p>2 Did that kind of statement form a usual part of</p> <p>3 a briefing?</p> <p>4 A. Not that I can particularly -- that form of words or</p> <p>5 similar would be, you know, I have heard before. But it</p> <p>6 is all based on the fact that, you know, we are at</p> <p>7 an unknown stage, which is why the investigation or the</p> <p>8 priority still remains with the surveillance of the</p> <p>9 subjects as opposed to if we had sufficient evidence</p> <p>10 that, you know, that they had committed an offence or</p> <p>11 had possession of prohibited items then we would just</p> <p>12 simply be able to go and arrest them at their home</p> <p>13 address.</p> <p>14 Q. The next day, when Superintendent Granby and X7 came to</p> <p>15 give the briefing, there was no equivalent statement to</p> <p>16 that. Would that have been unusual, that there wasn't</p> <p>17 an assessment given about the extent to which the</p> <p>18 subjects had access to or were in possession of</p> <p>19 firearms?</p> <p>20 A. It would be usual for variances between TFCs in the</p> <p>21 way -- the manner in which they deliver those -- that</p> <p>22 information and those -- those pieces of information and</p> <p>23 intelligence. So it wouldn't be unusual for that to</p> <p>24 vary, but it would generally cover the same areas.</p> <p>25 I can't really say any more than that.</p> <p style="text-align: center;">Page 83</p>
<p>1 need to be aware there is no current information or</p> <p>2 intelligence to say that the subjects have either</p> <p>3 possession or immediate access to firearms or other less</p> <p>4 lethal weapons. However, my assumption is that they are</p> <p>5 about to commit armed robbery based on their previous</p> <p>6 criminal behaviour. They will either have firearms or</p> <p>7 less lethal weapons. So you are all highly trained in</p> <p>8 judgment to again deal with the threat that we may face</p> <p>9 at the time we go to intercept them."</p> <p>10 Do you now have a memory of being told that?</p> <p>11 A. No.</p> <p>12 Q. Reading that now, what do you understand him to mean?</p> <p>13 A. That there is a firearm or other dangerous article</p> <p>14 hasn't been witnessed, observed or confirmed in</p> <p>15 possession of the subjects, but that is not unusual in</p> <p>16 my experience.</p> <p>17 Q. What about the second half of his paragraph there?</p> <p>18 A. Regarding their -- his belief or his assumption?</p> <p>19 Q. Yes.</p> <p>20 A. Well it was his assumption based on the intelligence</p> <p>21 that he had been given that they were going to commit</p> <p>22 a robbery.</p> <p>23 Q. In fact he doesn't say that it is an assumption on</p> <p>24 intelligence that he has been given. He says it is</p> <p>25 an assumption based on their previous criminal</p> <p style="text-align: center;">Page 82</p>	<p>1 Q. Okay. Wouldn't, as firearms officers on a job that</p> <p>2 concerned an alleged armed robbery, that be an important</p> <p>3 piece of information for you to know, whether it was</p> <p>4 assessed that the subjects were likely to have firearms?</p> <p>5 Almost the most critical thing?</p> <p>6 A. Forgive me for being frank about it, but the fact that</p> <p>7 an SFO team has been mobilised and a MASTS authorised</p> <p>8 would suggest there was significant information and</p> <p>9 intelligence to suggest that that was required. So it</p> <p>10 is a given in my view, everything else is just painting</p> <p>11 a picture in relation to this particular group. If that</p> <p>12 answers your question.</p> <p>13 Q. No. Do you not consider that to be slightly self</p> <p>14 fulfilling? We are firearms officers. We have been</p> <p>15 told that we are deployed. Therefore the subjects must</p> <p>16 have guns?</p> <p>17 A. No, not necessarily guns but otherwise so dangerous.</p> <p>18 Q. Yes, but don't you want to distinguish between the</p> <p>19 various different threats that subjects may pose, as to</p> <p>20 whether or not there is intelligence that they have</p> <p>21 firearms, that they have other weapons, that they are</p> <p>22 otherwise so dangerous because of a use of a car as</p> <p>23 a weapon or because they have a dog with them or another</p> <p>24 type of weapon?</p> <p>25 A. Yes, I would expect on a briefing to be told as much as</p> <p style="text-align: center;">Page 84</p>

1 possible regarding the -- that specific group, or the
 2 fact that we were at the stage where we were briefing
 3 for an operation that a sufficient assessment of the
 4 intelligence and information has been made by the SFC
 5 and TFC and authority granted. So I wouldn't agree that
 6 it is self fulfilling. The fact that we are there would
 7 suggest that the command structure believe that the
 8 threat is so much that they require an armed asset to
 9 deal with that particular group.

10 Q. What is your understanding of the extent and nature of
 11 the process that is gone through by the TFC and the SFC,
 12 to get to the stage where you are there?

13 A. My understanding is that you will have a proactive
 14 investigation team, in this case the Robbery Unit --

15 Q. Yes.

16 A. -- who will approach, will be -- will have an ongoing
 17 investigation, usually supported by surveillance, and
 18 based on that surveillance and actions of the group they
 19 are watching, would deem that the operation is coming to
 20 a stage where they may need an arrest capability. And
 21 if it is armed or otherwise so dangerous or they believe
 22 them to be armed or otherwise so dangerous, then that
 23 would mean they would have to go to what would be the
 24 cadre TFC and that TFC would assess the
 25 information/intelligence. And then approach an SFC, if

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1 they were satisfied that that was the case, for the SFC
 2 to grant authority.

3 Q. Your understanding is that, summarising it, it had been
 4 through a number of checks and balances before it gets
 5 to you --

6 A. Yes.

7 Q. -- and that considerable care and attention had been
 8 paid to the intelligence case --

9 A. Yes.

10 Q. -- before your deployment can occur?

11 A. Yes, in my experience, it is more often than not it is
 12 refused, the authority. And investigation teams and
 13 surveillance teams are sent away to develop, I think is
 14 the develop the intelligence. So it's -- you know, it
 15 is a recognised robust process.

16 Q. It is robust and exquisite care has been given?

17 A. Well that is my observation of it. Obviously I am not
 18 party to all the elements.

19 Q. No, to see what in fact happened, but your belief is
 20 that care and attention, perhaps exquisite care, has
 21 been paid to the intelligence case before you get
 22 deployed?

23 A. Yes, due diligence and professionalism would be applied.
 24 In the same way we would do.

25 Q. Yes.

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1 Did you understand on the 2 March briefing that the
 2 plan was to prevent the subjects, if they entered the
 3 Audi, from ever getting to Culcheth?

4 A. I can't recall the briefing or the intent from that
 5 particular -- to be perfectly frank with you.

6 Q. Okay. If we can look at a couple of bits of the
 7 briefing to jog your memory, 1179, please. Can you see
 8 the largest paragraph about seven or eight lines in. It
 9 is said:

10 "The reason we are at Leigh police station is
 11 obviously to intercept the subjects prior to them
 12 getting to Culcheth."

13 Yes?

14 A. Yes.

15 Q. Then over the page to 1180, I think X7 says:

16 "While we are on the subjects. Our intention is to
 17 conduct an interception prior to any offence taking
 18 place, which is before we get to Culcheth."

19 Do you see that?

20 A. Sorry, whereabouts is that.

21 Q. At the beginning of the second paragraph.

22 A. Yes, that is correct.

23 Q. Do those words used by X7 tend to suggest that the
 24 intention was to prevent the subjects from ever getting
 25 to Culcheth?

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1 A. Yes, certainly that is what it suggests.

2 Q. Can you recall now whether the plan was the same the
 3 next day?

4 A. The plan the next day, from memory, was to prevent
 5 a robbery taking place, as it generally always is, that
 6 is the general feeling about it without going through
 7 the priority order was to prevent a robbery taking
 8 place.

9 I don't remember if it was the same as that or not,
 10 as in not, you know, before they get to Culcheth.

11 Q. Yes. You see that here it appears to be that the rather
 12 broad and general, "The aim is to protect the public,
 13 prevent a robbery from taking place ..." has been honed
 14 down into something more of a plan --

15 A. Yes.

16 Q. -- namely when we are going to stop the vehicle?

17 A. Yes.

18 Q. That isn't evident on the briefing the next day. The
 19 following day's briefing, that didn't occur. Do you
 20 know why that was?

21 A. No.

22 Q. I don't suppose you can recall now whether it was
 23 noticeable that the previous day's plan was not the
 24 3 March plan?

25 A. Not to my recollection.

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<p>1 Q. Okay.</p> <p>2 Can we turn then to the events of 3 March</p> <p>3 themselves. Before I do so, can I look at how your</p> <p>4 written accounts of that day have come to be created.</p> <p>5 We can put the general bundle away.</p> <p>6 In tab 1 of your own bundle, I think we can see that</p> <p>7 your first written account is of 9 March. Is that</p> <p>8 right?</p> <p>9 A. I believe my first written account was an initial</p> <p>10 account, as in a duty statement on the night.</p> <p>11 Q. A duty statement?</p> <p>12 A. Yes, ie I was on duty and took part in this operation.</p> <p>13 Q. In what form did you make the duty statement?</p> <p>14 A. Again, from memory, it would have been an MG11.</p> <p>15 Q. How did you make it, was it handwritten or was it typed?</p> <p>16 A. I can't remember.</p> <p>17 Q. Whereabouts did you make it?</p> <p>18 A. I can't remember. I am assuming it would have been back</p> <p>19 at the post-incident suite.</p> <p>20 Q. Were there facilities to -- were there a stock of MG11s</p> <p>21 there that you could access?</p> <p>22 A. Yes, it is a police facility so there were always --</p> <p>23 Q. This was at Claytonbrook, was it?</p> <p>24 A. Yes.</p> <p>25 Q. Can you remember what you said in the duty statement?</p> <p style="text-align: center;">Page 89</p>	<p>1 with a different witness -- the stage 3 being stage 3 of</p> <p>2 some paragraphs in part 7 of the manual of guidance?</p> <p>3 A. It is essentially my initial account of being there, it</p> <p>4 is --</p> <p>5 Q. I know that, but it is the terminology of "stage 3", is</p> <p>6 that where you are taking that from?</p> <p>7 A. It is just what it is commonly known as, forgive me</p> <p>8 I don't know the different elements of the manual of</p> <p>9 guidance where it may refer -- I would have to look at</p> <p>10 the manual of guidance to confirm that.</p> <p>11 Q. Okay.</p> <p>12 If we look, please, at tab 8 in the bundle. I think</p> <p>13 we can see a pocket book entry of yours for 3 and then</p> <p>14 4 March; is that right?</p> <p>15 A. Yes -- well it is off duty 4 March.</p> <p>16 Q. Yes, but it is still an entry in the pocket book?</p> <p>17 A. Yes.</p> <p>18 Q. Were these made each on 3 and then 4 March?</p> <p>19 A. No, that would have been one entry, finishing on</p> <p>20 4 March.</p> <p>21 Q. The entry for 3 and 4 March, they were both made on</p> <p>22 4 March?</p> <p>23 A. Yes.</p> <p>24 Q. You see for Saturday the 3rd, you say:</p> <p>25 "04.00, parade on duty at TFU in relation to</p> <p style="text-align: center;">Page 91</p>
<p>1 A. Not verbatim, but it would be a very straightforward:</p> <p>2 "I was on duty at this time till this time. I took</p> <p>3 part in Operation Shire ..."</p> <p>4 You know:</p> <p>5 "My role was this ..."</p> <p>6 I wouldn't go into any significant detail, that is</p> <p>7 for my full statement.</p> <p>8 Q. Did you make that statement in common with other</p> <p>9 officers, ie were other officers doing the same as you?</p> <p>10 A. I can only speak for myself. It is stage 3 account, it</p> <p>11 is something that is -- I have been involved in a number</p> <p>12 of post-incident matters and it is quite a common</p> <p>13 practice. Certainly for particular individuals,</p> <p>14 I wouldn't -- I didn't get involved in anybody else's</p> <p>15 paperwork, so forgive me --</p> <p>16 Q. Did you see other people doing it?</p> <p>17 A. Not to my recollection.</p> <p>18 Q. Did you say to other people, "I am going to do a stage 3</p> <p>19 account"?</p> <p>20 A. I can't recall that.</p> <p>21 Q. Did anyone prompt you to make a stage 3 account or did</p> <p>22 you do it off your own bat?</p> <p>23 A. I can't recall whether I was prompted or whether I did</p> <p>24 it, you know, off my own bat.</p> <p>25 Q. You are referring there -- we looked at it this morning</p> <p style="text-align: center;">Page 90</p>	<p>1 Op Shire. Duties as per ..."</p> <p>2 What is AR?</p> <p>3 A. I think that is "audio recording", I have looked at this</p> <p>4 document and I have racked my brains and I am not</p> <p>5 100 per cent sure, but I think that would be audio</p> <p>6 recording.</p> <p>7 Q. "... and briefing."</p> <p>8 A. Yes.</p> <p>9 Q. "Initial account given in MG11."</p> <p>10 Yes?</p> <p>11 A. Yes.</p> <p>12 Q. Then:</p> <p>13 "5.30, Sunday, 4 March, off duty."</p> <p>14 By 5.30 on Sunday, 4 March, you had given an initial</p> <p>15 account of the events of 3 March in an MG11?</p> <p>16 A. Yes.</p> <p>17 Q. Is that the duty statement that you have just referred</p> <p>18 to, they are one and the same?</p> <p>19 A. Yes.</p> <p>20 Q. What did you do with the duty statement when you made</p> <p>21 it?</p> <p>22 A. Forgive me, I don't remember where I actually put it.</p> <p>23 I would imagine all paperwork would have been collated</p> <p>24 by the post-incident manager, who was --</p> <p>25 Q. Can you remember which post-incident manager?</p> <p style="text-align: center;">Page 92</p>

1 **A. I think it was Mr Simpson was the post-incident manager**
 2 **for the ...**
 3 Q. You say that you think it would have been, because that
 4 is the logical thing to have done?
 5 **A. Yes, well I don't physically remember handing it to**
 6 **anybody in particular or leaving it in any particular**
 7 **pile or being asked for it by any particular officer.**
 8 Q. You cannot recall now the contents of it?
 9 **A. No.**
 10 Q. I think you know that we no longer have that account.
 11 **A. Well I would imagine it would have been in the bundle**
 12 **and I have not seen it, so yes.**
 13 Q. Yes.
 14 You then came to give an account on 9 March, when
 15 you attended Nexus House at about 1.15.
 16 **A. Yes.**
 17 Q. What were the circumstances which came to you making
 18 that account?
 19 **A. Ie how we got there and --**
 20 Q. Not necessarily walking or on the bus, but why was it
 21 that on 9 March you made this account?
 22 **A. Arrangements were made by the management of the TFU for**
 23 **us to have a comfortable and sort of suitable place to**
 24 **make our initial or our full and frank statements**
 25 **regarding the incident.**

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1 Q. You said that was TFU management.
 2 **A. Yes.**
 3 Q. Had they given any instructions about not making
 4 an account before then?
 5 **A. Yes, from memory, we were asked by the IPCC, or it was**
 6 **their -- and again this is from memory, that they wanted**
 7 **to interview us on video and on tape, and there was**
 8 **a dispute if you would like between the kind of police**
 9 **management side and the IPCC regarding whether that was**
 10 **appropriate for our roles.**
 11 Q. Did you contribute to that debate?
 12 **A. No.**
 13 Q. Did you say, "I am not happy to do that"?
 14 **A. I did say that I wouldn't be happy to be interviewed on**
 15 **video and I am pretty sure I wouldn't have wanted to be**
 16 **interviewed on tape as I am satisfied that**
 17 **a professional police statement would be adequate under**
 18 **these circumstances.**
 19 Q. And so it came that you made a statement on 9 March?
 20 **A. Yes.**
 21 Q. I think it was the case that all of the AFOs were in the
 22 same room together; is that right?
 23 **A. Yes.**
 24 Q. Was that a usual process?
 25 **A. Not at all.**

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1 Q. Did anyone say, "This is a bit unusual"?
 2 **A. It is unusual. Obviously there are -- there was**
 3 **a rationale for it and it is a rationale that I have**
 4 **seen used in other forces for noting down known facts**
 5 **such as time, day, date, et cetera, but it is unusual to**
 6 **have to have the -- have that level of detail and the**
 7 **level of accuracy around the known facts, but it was**
 8 **an unusual case because somebody has lost their life.**
 9 Q. My question was in fact did anyone say, "This is
 10 unusual"?
 11 **A. Not to my recollection, no.**
 12 Q. People just got on with it?
 13 **A. Yes.**
 14 Q. You said that some things were known facts, yes?
 15 **A. Yes.**
 16 Q. Who were they known to?
 17 **A. Well, various people, whether it be the scene would be**
 18 **known to some individuals, or the location couldn't**
 19 **change, obviously the car park, the roads that were on**
 20 **the car park. The time that was given, Amber was given,**
 21 **would be noted by I would assume the TAC adviser and the**
 22 **AVCIS. So those things were known facts that could not**
 23 **really be changed however they were logged, obviously**
 24 **elsewhere.**
 25 Q. Do you know where the "known facts" came from?

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1 **A. No.**
 2 Q. But you were happy to use them?
 3 **A. I was satisfied that the sergeant who was present**
 4 **writing it on the board had obtained the facts in good**
 5 **faith.**
 6 Q. But you didn't know from where?
 7 **A. I -- my professional knowledge tells me from where he**
 8 **has got them, ie the State Amber would have been given**
 9 **by the TFC and he would have noted that in his book and**
 10 **that would have been, those people would have been**
 11 **spoken to regarding that. I had a trust in the source**
 12 **of that information.**
 13 Q. Did it occur to you that what you should be recording is
 14 your recollection of when things occurred, not somebody
 15 else's recollection of when things occurred?
 16 **A. Yes, I don't think it is -- I actually don't think it is**
 17 **relevant whether, what time we went to State Amber but**
 18 **it was -- it gave a very clear picture and I think**
 19 **sometimes this is more to satisfy other people than it**
 20 **is the individual.**
 21 Q. Why is it not relevant at all what time you went to
 22 State Amber?
 23 **A. Because if I didn't note it with my watch at the time,**
 24 **what -- you know, we still went State Amber and we still**
 25 **put an intervention in on the vehicle. So from my point**

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1 **of view, and this is -- I can only speak from my point**
 2 **of view, that it is not actually relevant. Some times**
 3 **you are on the deployment, we committed to State Amber**
 4 **and arrested the subjects.**
 5 Q. You don't think it might be important for maybe a judge
 6 looking at an event a little bit later to compare it
 7 against other information, to see whether that
 8 information was available by the time that 16 people
 9 said that we went to State Amber at 19.08?
 10 **A. Of course it is relevant, but if a judge would like to**
 11 **see it then it is written down in a TFC's log or a TAC**
 12 **adviser's log.**
 13 Q. Do you have in front of you the flip chart there? It is
 14 three pieces of paper that are a photocopy of a flip
 15 chart.
 16 **A. Yes.**
 17 Q. If you open your statement at 9 March, please.
 18 **A. Is that tab 1?**
 19 Q. It is.
 20 **A. Yes.**
 21 Q. I just want to see which information you took from the
 22 flip chart and which you didn't.
 23 You say in the second paragraph of your statement:
 24 "At approximately 4.20 I paraded on/at the Tactical
 25 Firearms Unit base, which is situated in the [I think it

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1 is] Openshaw complex of Manchester. I had previously
 2 been warned to parade for 4.30."
 3 Was that taken from the flip chart, "Tour of duty:
 4 4.30" at the top?
 5 **A. No, not from memory. It is not written on there, so ...**
 6 Q. Sorry?
 7 **A. It is not written on this anywhere, so ...**
 8 Q. It is at the top, "TOD, 4.30".
 9 **A. 4.30.**
 10 **I don't know.**
 11 Q. Okay.
 12 The fourth paragraph of your statement says:
 13 "At approximately 06.00 hours I was present with
 14 other officers in a recorded briefing."
 15 Do you see on the right-hand side of the first page
 16 of the flip chart it says:
 17 "Approximately 06.00 hours ..."
 18 Do you think you got that from there?
 19 **A. Yes, in all likelihood. The wording is the same.**
 20 Q. Again in that paragraph, the third sentence, you give
 21 the registration number of the vehicle, if you would
 22 look at the second page of the flip chart.
 23 **A. Yes.**
 24 Q. It is, I think, the same, "L008 LOD"?
 25 **A. Yes.**

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1 Q. Did you take that from the flip chart?
 2 **A. Yes, because I now know that to be wrong, so it was**
 3 **"Romeo Oscar", not "Lima Oscar".**
 4 Q. I suppose that is one of the dangers of just relying on
 5 what somebody else has written down?
 6 **A. Absolutely.**
 7 Q. Going back to your statement, if we go to the second
 8 page, please, if we look at the second and third main
 9 paragraphs, you say:
 10 "Just after 18.00 hours, the whole team left Leigh
 11 police station."
 12 Yes?
 13 **A. Yes.**
 14 Q. Then in the flip chart it says that you left Leigh
 15 police station at 18.15.
 16 Why didn't you use the flip chart for that purpose?
 17 **A. I couldn't tell you.**
 18 Q. But if as you have said this had been through a careful
 19 process by reference to somebody's log and effectively
 20 the presumption of rectitude applied --
 21 **A. Yes.**
 22 Q. -- you don't know why you wouldn't have used the
 23 information you were being provided with?
 24 **A. Well I can only -- my personal view on it is that I can**
 25 **use that as a source of intelligence for my statement**

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1 **and you have quite rightly pointed out that one of the**
 2 **elements within that, the registration, was incorrect**
 3 **the prefix to the first letter was incorrect. I didn't**
 4 **feel as though I needed to use everything in full to**
 5 **complete my statement, it was just a reference point.**
 6 Q. If we look at the last paragraph on page 131 there, so
 7 the second page of the statement --
 8 **A. Yes.**
 9 Q. -- about five or six lines in, you say:
 10 "Once it was confirmed the vehicle was still
 11 occupied, permission to arrest was given from the TFC
 12 via the team leader. This information was passed over
 13 a back-to-back radio channel by X7 at approximately
 14 19.10 hours."
 15 You are describing State Amber there, aren't you?
 16 **A. Yes.**
 17 Q. You have described it as at approximately 7.10. In the
 18 flip chart you were being told that the time was 19.08.
 19 Two questions.
 20 Firstly, why didn't you use the time that you were
 21 being given?
 22 **A. I can't answer -- I can't that question, I can't recall.**
 23 Q. If what you said earlier was accurate?
 24 **A. Yes, I can't recall why I didn't use 19.08 and I used**
 25 **19.10.**

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1 Q. From where did you get the time 19.10?
 2 **A. I don't know.**
 3 Q. Why did you write it?
 4 **A. I don't know.**
 5 Q. On the last page of your witness statement, you say you
 6 made this witness statement at that time and date in the
 7 last paragraph:
 8 "... in the presence of my colleagues, during the
 9 making of the statement I, from time to time, clarified
 10 with my colleagues matters relating to times, vehicle
 11 types and registration and subject details."
 12 Which colleagues did you clarify times with?
 13 **A. I can't specifically tell you who I consulted with and**
 14 **it is a process that I try to minimise. I agree that it**
 15 **has led to some inconsistencies but I can't tell you who**
 16 **specifically I spoke to on the evening or on the**
 17 **afternoon.**
 18 Q. Similarly in relation to vehicle types, registrations
 19 and subject details, you cannot tell us who you spoke
 20 to?
 21 **A. No.**
 22 Q. Yes, thank you, we can put the flip chart to one side
 23 then.
 24 Going back to the first page of this account of
 25 9 March, the final paragraph on the page, you say at

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1 approximately 06.00 hours you were:
 2 "... present with other officers in a recorded
 3 briefing which outlined the details of a number of
 4 subjects that were in possession of a stolen vehicle
 5 ..."
 6 Then you describe it. Then you say:
 7 "It was believed that the subjects of the operation
 8 were going to use the vehicle to commit a robbery at
 9 unknown premises."
 10 Yes?
 11 **A. Yes.**
 12 Q. When you made this statement, 9 March, the matters were
 13 obviously fresher in your mind than they are now?
 14 **A. Yes.**
 15 Q. Does that therefore describe what you took from the
 16 briefing?
 17 **A. Yes.**
 18 Q. Namely it was your belief, based on what you had been
 19 told, that the robbery was going to be committed at
 20 premises?
 21 **A. Well, yes.**
 22 Q. Rather than for example a cash in transit delivery?
 23 **A. Delivering to a premises, so yes.**
 24 Q. Well --
 25 **A. Well cash in transit are only at risk when they are**

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1 **delivering at a premises.**
 2 Q. Are they not when they are driving down a road?
 3 **A. No, because it is an armoured vehicle.**
 4 Q. You intend this to mean at unknown premises or a cash in
 5 transit van when delivering at such premises?
 6 **A. Yes.**
 7 Q. Is that really what you meant by that?
 8 **A. Yes.**
 9 Q. You say that:
 10 "The village of Culcheth was mentioned as a possible
 11 area where the offence may occur, but also reminded that
 12 the [I think that is meant to mean 'operation'] was to
 13 remain fluid in response to the subjects' movements.
 14 The overall threat assessment of the operation had been
 15 deemed high by Superintendent Granby."
 16 On 9 March it seems that what you could recall from
 17 the briefing was the overall threat assessment or risk
 18 assessment by the TFC, rather than the individual
 19 subjects. Is that right?
 20 **A. Well I have just articulated that it is high, perhaps in**
 21 **summary rather than going through each specific subject**
 22 **of the operation.**
 23 Q. What do you remember now about the threat assessment for
 24 the individual subjects?
 25 **A. That they were -- that it was high. That it was they**

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1 **were deemed -- I just remember the feeling that these**
 2 **were believed to be dangerous individuals.**
 3 Q. Since then, you have no doubt been reading the
 4 transcript assiduously in the last few weeks?
 5 **A. Not completely, not verbatim. But I have certainly**
 6 **refreshed on each day's hearings.**
 7 Q. Are you now able to distinguish between what your true
 8 memory is of what you were briefed and how it has been
 9 improved by reading the transcript of each day's
 10 evidence?
 11 **A. In respect to?**
 12 Q. Well, what you can remember of the threat assessment in
 13 relation to each subject? What you took away from the
 14 briefing.
 15 **A. You are asking me to -- I am now clear on it or I was**
 16 **clear at the time?**
 17 Q. Yes, were you clear at the time?
 18 **A. I was clear at the time that they were a dangerous group**
 19 **of individuals.**
 20 Q. Can you remember whether you were told that they had
 21 convictions?
 22 **A. If it was on the briefing, it would have been read out.**
 23 **I don't specifically remember anybody saying that but**
 24 **obviously it was a while ago.**
 25 Q. If we look, please, at the PowerPoint in the general

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1 bundle, number 2 again.
 2 **A. Yes.**
 3 Q. At tab 22 and at page 1267.
 4 **A. Just bear with me one moment. Tab 22?**
 5 Q. Yes.
 6 **A. Page?**
 7 Q. 1267.
 8 **A. Yes.**
 9 Q. This was read out almost verbatim to you at that time,
 10 the 6.00 briefing. I want your understanding of what,
 11 please, each of the first two paragraphs meant to you:
 12 "The subjects of this operation are believed to be
 13 engaged in armed robberies in the north-west region."
 14 Firstly, the reference to "armed robberies", did you
 15 take that to mean firearms?
 16 **A. Firearms or otherwise so dangerous, when it is a**
 17 **generalisation like that.**
 18 Q. Sorry, I missed what you said --
 19 **A. Firearms or otherwise so dangerous, it could be an axe,**
 20 **it could be a machete, it could be something similar to**
 21 **that.**
 22 Q. So not necessarily firearms?
 23 **A. Not necessarily firearms.**
 24 Q. How would you -- I think you may have answered this
 25 already. You would treat that as established fact,

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1 really?
 2 **A. Yes.**
 3 Q. The second paragraph:
 4 "There is intelligence to suggest that these
 5 subjects were responsible for a robbery in 2008 in
 6 Preston. Where they broke into a bank, lay in wait, on
 7 arrival they [I think that means the staff] were held at
 8 gunpoint, a shotgun and handgun, tied up and forced to
 9 hand over keys. The suspects made good their escape
 10 with a substantial amount of money."
 11 Did you understand that to be a reference to the
 12 three subjects that you were then briefed about?
 13 **A. Yes.**
 14 Q. Ie all three of them had jointly participated in
 15 a robbery?
 16 **A. Or believed to be, yes.**
 17 Q. Yes.
 18 Again, you said "or believed to be", what made you
 19 think that rather than that this was an established
 20 fact?
 21 **A. Because if they knew that was the case, we would have**
 22 **arrested them before this operation.**
 23 Q. Okay. You presumably would take from that that two
 24 firearms had been used by these three subjects?
 25 **A. Or two firearms were available to the subjects.**

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1 Q. Yes, not discharged but they were used to commit the
 2 robbery?
 3 **A. Yes.**
 4 Q. On each of the threat assessments, if you go over the
 5 page, for all three subjects, it is said that their
 6 intent was to commit an armed robbery. Would you apply
 7 the same logic that you did earlier to those words, that
 8 "armed" meant using a weapon of some type?
 9 **A. Yes.**
 10 Q. Looking at page 1268, the threat assessment for
 11 Mr Totton. Do you see the three warnings that are given
 12 against his name?
 13 **A. Yes.**
 14 Q. What do you understand those to mean, that there were
 15 three warnings?
 16 **A. Due to the dates, that would suggest to me that he was**
 17 **found in possession of a shotgun in 1999 or --**
 18 Q. What do you mean he was found --
 19 **A. Arrested in possession of a shotgun, or a shotgun was**
 20 **attributed to him during an arrest.**
 21 Q. Okay. And what, he had been convicted of it or --
 22 **A. Well, I do not have any idea regarding whether he was**
 23 **convicted or not.**
 24 Q. Is that how you treat this when you are given warnings,
 25 that this is just something that somebody says, it is

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1 not an established fact?
 2 **A. Well, what that would suggest to me as a, from**
 3 **an operational point of view is that subjects had access**
 4 **to a firearm, maybe as a group, had been arrested,**
 5 **potentially convicted, potentially not, depending on how**
 6 **that worked out in court. Sometimes colleagues or other**
 7 **members of the gang will take responsibility for**
 8 **possession of something, so not everybody is convicted**
 9 **but it would suggest to me at some stage in history that**
 10 **that person has been in proximity or had access to**
 11 **a shotgun.**
 12 **That is a broad description of what I would**
 13 **summarise in probably a one line there.**
 14 Q. Yes. What about, "Used iron bar during section 47 in
 15 2001". How would you treat that? What would that mean
 16 to you?
 17 **A. That he has been identified and arrested for using**
 18 **an iron bar against a subject in 2001.**
 19 Q. These are definitely arrests?
 20 **A. Definitely arrests.**
 21 Q. Not just intelligence?
 22 **A. Not just intelligence, just due to the date.**
 23 Q. And why --
 24 **A. Because it is specific, you know, they have obviously**
 25 **added an element of specific --**

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1 Q. That because a date is included, it must mean that there
 2 was an arrest?
 3 **A. Reading that on face value now, that is what it would**
 4 **suggest to me if I was reading this on a briefing today.**
 5 Q. The last line:
 6 "10 incidents of assault in the past five years."
 7 Again, each being arrests?
 8 **A. Yes, but he has not got dates for those obviously, so**
 9 **that is a little bit woolier.**
 10 Q. For each of these you wouldn't know how certain or sure
 11 to be that Mr Totton had done these things? Is that
 12 right?
 13 **A. The frankest way of putting it is potentially that the**
 14 **subject has been named or seen to do something and**
 15 **whether it is a witness not coming forward or whether it**
 16 **has not been found at court, they have been involved.**
 17 **I would be satisfied that they had been involved in 10**
 18 **incidents of assault.**
 19 **Whether he was subsequently charged a penalty for**
 20 **that particular offence is a different matter, but**
 21 **I would be satisfied that the, our intelligence system**
 22 **would place those 10 incidents in respect of this**
 23 **particular individual.**
 24 Q. You would work on the basis that, for the purposes of
 25 the job that you were about to perform, these might be

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1 allegations but they are to be treated as true?
 2 **A. They are to be treated with caution, you know,**
 3 **ultimately this says to me this is somebody who is**
 4 **capable of violence.**
 5 Q. I just want to press you on that, that may be true, but
 6 how do you treat these? That, "I don't know whether or
 7 not they are accurate but because I am being told them
 8 by a briefing colleague, I am to treat them as
 9 accurate"?
 10 **A. I am satisfied that information has been gained credibly**
 11 **in that our intelligence system, how I deal with that**
 12 **individual would be based on his or her response to my**
 13 **intervention with that individual. I have dealt with**
 14 **lots and lots of subjects with lots and lots of**
 15 **antecedents who have complied with everything that**
 16 **I have asked them to do. So my level of force, if you**
 17 **like, or my level of contact with those reduces based on**
 18 **their reaction, irrespective of what it says on**
 19 **a briefing. I hope that is clear.**
 20 Q. Yes, so when you come across or confront a subject, you
 21 are quite often not in a position, presumably precisely
 22 to identify them by reference to the photograph that you
 23 have been shown in the briefing?
 24 **A. Sometimes you can identify them, sometimes you can't,**
 25 **depending on how similar individuals look to each other.**

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1 Q. Even if you can identify them, your actions are more
 2 regulated by what they do than what you have been told
 3 in a briefing hours before --
 4 **A. Yes.**
 5 Q. -- is that fair?
 6 **A. Yes.**
 7 Q. To an extent, what you are told at the briefing fades
 8 into the background a bit, you more deal with people on
 9 their merits as you confront them?
 10 **A. Yes, I refer to it as it gives a flavour of the**
 11 **individuals. When we actually deal with them,**
 12 **experience suggests that people behave in very different**
 13 **ways.**
 14 Q. For subject 2 over the page, please, page 69, here there
 15 is two warnings given for the same thing, "Subject has
 16 served five and a half years for a section 18 assault".
 17 I think you are being told there that he had been
 18 convicted?
 19 **A. Yes.**
 20 Q. Would that lead you to believe, "Well, hold on,
 21 I haven't been told that about the previous chap, that
 22 he has been convicted, but I am being told this about
 23 this person"?
 24 **A. No, I think it is an inconsistent approach to those**
 25 **warning markers but -- you know, it is potentially**

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1 **telling me as much as it says on a computer system, sir.**
 2 **I would expect to be told as much as they possibly can.**
 3 Q. Over to 1270, please, to Mr Grainger himself.
 4 **A. Yes.**
 5 Q. Again, the first warning marker, it is said that he has
 6 previously conspired to commit robberies with firearms.
 7 What would you have or what do you take from that?
 8 **A. That he is involved with an OCG that is conspiring to**
 9 **commit robbery.**
 10 Q. Why he is conspiring with an OCG?
 11 **A. Well, conspiring may be anything from a recce of**
 12 **a premises, a reconnaissance of a premises, you know,**
 13 **socialising or grouping with individuals who are known**
 14 **to be armed robbers, or known to be planning to commit**
 15 **an offence and potentially being part of that team.**
 16 Q. Where did you get that it was an OCG and that it was
 17 part of a team?
 18 **A. An organised crime group?**
 19 Q. Yes.
 20 **A. Mr Totton is very well known to be part of a Salford**
 21 **OCG.**
 22 Q. No, I am talking about what had happened previously
 23 here. It says "He has previously conspired to commit
 24 robberies with firearms".
 25 **A. Conspired with other individuals, that is common**

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<p>1 terminology from a police point of view would be</p> <p>2 an organised crime group, so there be some sort of -- if</p> <p>3 you were conspiring with somebody there would be some</p> <p>4 element of sophistication and organisation.</p> <p>5 Q. You would take that, you would assume that because it</p> <p>6 says he previously had conspired to commit robberies</p> <p>7 with firearms, it must have been in an OCG?</p> <p>8 A. It must have been part of a group that is capable of</p> <p>9 that, and that is more often than not an OCG.</p> <p>10 Q. That is what you would walk away from this briefing</p> <p>11 thinking?</p> <p>12 A. Yes, well the flavour of the --</p> <p>13 Q. "Numerous arrests for section 18, 20 offences."</p> <p>14 Would you take from that that, "There were no</p> <p>15 convictions, because otherwise I would be told"?</p> <p>16 A. Yes, yes, I would be.</p> <p>17 Q. What about a Group 1 offender, what did you understand</p> <p>18 a Group 1 offender to be?</p> <p>19 A. A serious offender, a priority offender for the force.</p> <p>20 Q. A serious offender in relation to what offences?</p> <p>21 A. Offences such as robbery and so on. It is not --</p> <p>22 I couldn't tell you exactly how they apply the Group 1</p> <p>23 because I am not part of that investigation world, but</p> <p>24 they are generally attributed to individuals who are</p> <p>25 involved in serious crime and organised crime groups.</p> <p style="text-align: center;">Page 113</p>	<p>1 Q. -- before you were called into action?</p> <p>2 A. Yes.</p> <p>3 Q. What did you do in that time?</p> <p>4 A. From memory, watched TV, I think I slept in one of the</p> <p>5 vehicles for a period of time, just generally relaxed.</p> <p>6 Q. You say in tab 1 of your bundle, we can put the general</p> <p>7 bundle away now, thank you, at page 2, in the second</p> <p>8 paragraph, the one beginning, "Following ..." The last</p> <p>9 sentence:</p> <p>10 "This rest period was undisturbed with the exception</p> <p>11 of updates from X7 regarding intelligence feeds about</p> <p>12 subject movements and how the operation was</p> <p>13 progressing."</p> <p>14 What updates did you receive from X7 regarding</p> <p>15 intelligence feeds?</p> <p>16 A. I can't specifically say what the updates were other</p> <p>17 than the fact that there was no requirement for</p> <p>18 a mobilisation or to move to State Green at that stage.</p> <p>19 It would be, you know, they may be near a car or near</p> <p>20 their home address or something of that nature, but I am</p> <p>21 guessing because it is obviously some time ago.</p> <p>22 Q. Did you receive anything before you moved from Leigh</p> <p>23 police station by way of updated intelligence to suggest</p> <p>24 that the subjects were armed or might be armed?</p> <p>25 A. Not from memory, no.</p> <p style="text-align: center;">Page 115</p>
<p>1 Q. I realise that you are not involved in the management of</p> <p>2 Group 1 offenders but you, as a firearms officer, are</p> <p>3 being told, "This chap is a Group 1 offender". What do</p> <p>4 you take from that?</p> <p>5 A. Nothing.</p> <p>6 Q. Nothing at all?</p> <p>7 A. No.</p> <p>8 Q. There is no point in you being told he was a Group 1</p> <p>9 offender?</p> <p>10 A. As I have already alluded to, you know, the briefing</p> <p>11 I receive about individuals is one thing. Their actions</p> <p>12 dictate my actions on any sort of arrest or interception</p> <p>13 that I or contact that I have with those individuals.</p> <p>14 Q. Is that, to your understanding -- you have spent a lot</p> <p>15 of time with firearms officers -- a common approach,</p> <p>16 that you would get a flavour of things from the</p> <p>17 briefing? When you are actually deployed that fades</p> <p>18 into the background and you deal with people by</p> <p>19 reference to their actions?</p> <p>20 A. It is certainly my approach. I couldn't speak for</p> <p>21 anybody else.</p> <p>22 Q. You went I think to the lay up point at Leigh police</p> <p>23 station. And you stayed there for about 12 or so</p> <p>24 hours --</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 114</p>	<p>1 Q. Did you receive any further intelligence update that</p> <p>2 suggested that there was intelligence that the subjects</p> <p>3 intended to carry out a robbery, other than what you had</p> <p>4 been told in the briefing?</p> <p>5 A. No, not from memory.</p> <p>6 Q. Were you told that from about 5.30 pm the command team</p> <p>7 knew that Robert Rimmer was unlikely to be in the Audi?</p> <p>8 A. I don't recall that being said.</p> <p>9 Q. Would you regard that as important information?</p> <p>10 A. No.</p> <p>11 Q. You had been briefed about him and seen his threat</p> <p>12 assessment?</p> <p>13 A. Yes.</p> <p>14 Q. Wouldn't information that he wasn't in the car be</p> <p>15 important?</p> <p>16 A. No.</p> <p>17 Q. Why?</p> <p>18 A. Because, you know, sometimes the subjects of</p> <p>19 an operation, again speaking regarding other operational</p> <p>20 deployments, you will have three subjects on the</p> <p>21 briefing and five end up committing a robbery. You may</p> <p>22 have three subjects on a briefing and one ends up</p> <p>23 committing a robbery.</p> <p>24 Sometimes people, for want of a better way of</p> <p>25 putting it, bottle it and this the kind of activity that</p> <p style="text-align: center;">Page 116</p>

<p>1 you see on a -- from a surveillance point of view.</p> <p>2 Q. "Bottle it" I think was the phrase?</p> <p>3 A. Yes.</p> <p>4 Q. They are having difficulty hearing on this side of the</p> <p>5 curtain.</p> <p>6 A. Apologies.</p> <p>7 Q. That may well be true, but you wouldn't want to know it</p> <p>8 beforehand? You are going in, you have been briefed</p> <p>9 about three, on your evidence, dangerous men, and the</p> <p>10 command team know that one of them is not going to be</p> <p>11 there. Wouldn't you at least want to know?</p> <p>12 A. My overriding concern would be a stolen vehicle is on</p> <p>13 the move with known subjects on board, who the subjects</p> <p>14 were, unknown, known, or otherwise, would be</p> <p>15 potentially -- not irrelevant but an aside really.</p> <p>16 Q. What about the fact that there was somebody in the</p> <p>17 vehicle, who was unknown and therefore you necessarily</p> <p>18 knew nothing about him? He may be innocent of any</p> <p>19 involvement in the enterprise, or he may be the most</p> <p>20 dangerous man in the north-west of England?</p> <p>21 A. Indeed.</p> <p>22 Q. Wouldn't that be relevant information for you?</p> <p>23 A. No. No. Our job is to prevent a robbery place, and</p> <p>24 sometimes that means us being in harm's way.</p> <p>25 Irrespective of whether it is the baddest man in the</p> <p style="text-align: center;">Page 117</p>	<p>1 was a man in the back of the car or a woman in the back</p> <p>2 of car that was innocent or the most dangerous person,</p> <p>3 then how would we be able to know that from police</p> <p>4 observations?</p> <p>5 If there was somebody in the back of car and they</p> <p>6 knew, then that would be something I would like to know.</p> <p>7 Q. It wouldn't bother you that Mr Rimmer was not in the</p> <p>8 car?</p> <p>9 A. No.</p> <p>10 Q. I think you moved off from Leigh police station just</p> <p>11 after 1800, yes?</p> <p>12 A. Yes.</p> <p>13 Q. Looking at page 2 of your witness statement here, you</p> <p>14 have that about 15 minutes before everyone else. What</p> <p>15 did you do in that 15 minutes or so? Can you remember?</p> <p>16 Everyone else has themselves moving off from Leigh</p> <p>17 at about 6.15.</p> <p>18 A. Right.</p> <p>19 Q. Can you remember --</p> <p>20 A. That must be just an anomaly with my recollection of the</p> <p>21 timings.</p> <p>22 Q. Would you have got your recollection from your watch?</p> <p>23 A. Forgive me, I don't -- I can't recall.</p> <p>24 Q. When you moved off, what position were you in the bravo</p> <p>25 vehicle?</p> <p style="text-align: center;">Page 119</p>
<p>1 north-west or whether it is an innocent party in the</p> <p>2 back, if it is deemed appropriate and proportionate to</p> <p>3 carry out an arrest of the subjects of that vehicle,</p> <p>4 then that is what we are tasked with doing and I would</p> <p>5 treat each of the individual occupants on a one-by-one</p> <p>6 basis.</p> <p>7 Q. Again, that is harking back to what you said earlier,</p> <p>8 that what you know about them, what you have been</p> <p>9 briefed about them, fades into the background. It is</p> <p>10 what action they take at the scene that is really</p> <p>11 important?</p> <p>12 A. Yes.</p> <p>13 Q. Again, in the same vein, you wouldn't want to know, for</p> <p>14 example, that Mr Grainger had been seen driving and</p> <p>15 Mr Totton was in the passenger seat and that the unknown</p> <p>16 male was in the rear?</p> <p>17 A. That may well have been said on the surveillance</p> <p>18 commentary, but I don't recall.</p> <p>19 Q. Would that be something that you want to know?</p> <p>20 A. I would want to know as much as possible, but, you know,</p> <p>21 it doesn't change the way I deal with a vehicle.</p> <p>22 Q. I am not sure you would want to know as much as</p> <p>23 possible, you just told me that it would be largely</p> <p>24 irrelevant that Mr Rimmer was not in the car?</p> <p>25 A. But if they -- I was referring to the fact that if there</p> <p style="text-align: center;">Page 118</p>	<p>1 A. Driver.</p> <p>2 Q. Was G6 the front nearside passenger?</p> <p>3 A. Yes.</p> <p>4 Q. Was U9 the rear offside passenger?</p> <p>5 A. Yes.</p> <p>6 Q. Was X9 the rear nearside passenger?</p> <p>7 A. Yes, that's correct.</p> <p>8 Q. What were you wearing?</p> <p>9 A. I was wearing, from memory, just sort of plainclothes,</p> <p>10 possibly a pair of jeans and a green strike jacket.</p> <p>11 Q. The strike jacket, did it have any identification on it</p> <p>12 that you were a police officer?</p> <p>13 A. It does have an identification. I have actually brought</p> <p>14 it with me, if it would benefit the Inquiry.</p> <p>15 Q. That is very kind. Thank you. Is it down here?</p> <p>16 A. It is in the witness room.</p> <p>17 Q. Is it the same as this one, except green? (Indicates)</p> <p>18 A. It is similar; the police badge is reflective.</p> <p>19 Q. Okay, perhaps you had better go and get it. I think the</p> <p>20 usher will go and do that.</p> <p>21 I will carry on asking other questions meanwhile.</p> <p>22 Did you have a police cap with you?</p> <p>23 A. Yes.</p> <p>24 Q. Did you wear that at any stage?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 120</p>

1 Q. Did you have any other identifiable markings that you
 2 were a police officer?
 3 **A. No.**
 4 Q. When you pulled off from Leigh police station and drove
 5 in the general direction of the East Lincs road, the
 6 A580 --
 7 **A. Yes.**
 8 Q. -- what did you understand, if anything, the plan to be?
 9 **A. That we were going to shadow the movements of the**
 10 **surveillance around the subjects on what we referred to**
 11 **as State Green.**
 12 Q. Thank you, I think the witness can be shown it, thank
 13 you. (Pause)
 14 **A. Thank you.**
 15 Q. Perhaps if you just show us the jacket.
 16 **A. It has a further large police logo on the back.**
 17 **(Indicates)**
 18 Q. Is that the back of the jacket?
 19 **A. That is the back of the jacket, that is the front.**
 20 Q. When you came to get out of the police car on
 21 the car park at Thompson Avenue, did you release the
 22 flaps on both?
 23 **A. Yes, this would have been out because I was sat in the**
 24 **car. That would have been prior to moving into the car**
 25 **park. (Indicates)**

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1 Q. Thank you.
 2 Did there come a time when you drove closer to the
 3 centre of the Culcheth?
 4 **A. Yes.**
 5 Q. Was the alpha vehicle in front of you?
 6 **A. Yes.**
 7 Q. Did that vehicle contain X7, the OFC?
 8 **A. Yes.**
 9 Q. Was he giving directions on what to do?
 10 **A. Yes.**
 11 Q. In the time that passed, between just after 6.00 when
 12 you left the police station and 7.10, on your account,
 13 when Amber was called, in that hour and 10 minutes, what
 14 did you do?
 15 **A. Specifically? Stayed outside of the surveillance**
 16 **bubble, as we refer to it, which is the group of**
 17 **surveillance officers following the subjects, but in**
 18 **a position to respond to changing intelligence. That**
 19 **usually looks like us parking in car parks or pulling up**
 20 **at the side of the road or, you know, various locations**
 21 **where we can wait.**
 22 Q. The vehicle wasn't in Culcheth, the subject vehicle, for
 23 an hour and ten minutes. Can you remember what you did
 24 from just after 18.00, before the subject vehicle
 25 arrived in Culcheth?

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1 **A. From memory, I can't, I can't tell you the exact route**
 2 **or where we held. I am not entirely familiar with that**
 3 **particular area.**
 4 Q. When you were parked up in Culcheth, was it clear that
 5 the strike was going to be in Culcheth?
 6 **A. I knew that the -- there was significant concern around**
 7 **premises in Culcheth and I knew that obviously when the**
 8 **vehicle arrived in Culcheth that the, that kind of**
 9 **increased the likelihood of a State Amber being called.**
 10 Q. When State Amber was called at 7.10, where was your
 11 vehicle?
 12 **A. From memory, it would have been on, I think we were on**
 13 **a pub car park, held, waiting to move forward.**
 14 **I certainly remember waiting in a pub car park.**
 15 Q. Can you recall how long there was between when the
 16 surveillance team followed the vehicle to the car park
 17 just off Jackson Avenue, near to Common Lane, and Amber
 18 being called?
 19 **A. There was a delay, the surveillance officer that**
 20 **followed the stolen vehicle into the car park was,**
 21 **because it is quite a difficult area to remain covert,**
 22 **he had some difficulty keeping what they referred to as**
 23 **an eyeball on that subject vehicle, so had to leave or**
 24 **move away from the plot or lose eyeball.**
 25 **There was a subsequent concern that there was nobody**

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1 **actually viewing the car and there was quite a lot of**
 2 **radio traffic from the surveillance team trying to**
 3 **re-establish that contact, because it was believed, or**
 4 **potential that there was nobody in the car anymore and**
 5 **there was a concern that the robbery was taking place.**
 6 **That was my overview sort of feeling of the commentary**
 7 **at the time.**
 8 Q. The concern that was being expressed, was that being
 9 expressed to quite a high level?
 10 **A. Yes. Yes.**
 11 Q. Is this was significant, that eyeball had been lost?
 12 **A. It was significant, but the main thrust of the**
 13 **difficulty was the -- it was perceived that, due to**
 14 **previous observations, that the subjects of the vehicle**
 15 **had carried out quite effective anti-surveillance**
 16 **manoeuvres and they were very, very surveillance aware.**
 17 **So there was a concern that the officers who were**
 18 **trying to establish an eyeball of them would then be**
 19 **observed by the subjects and therefore cause them to**
 20 **flee from that particular area or frustrate the**
 21 **investigation.**
 22 Q. There was a period of time when it was thought the car
 23 might be empty, the subjects are carrying out a robbery
 24 almost under our very noses?
 25 **A. Yes.**

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1 Q. In your statement you described it as:
 2 "Following a short delay, during which confirmation
 3 that the subjects were still in the vehicle was being
 4 established."
 5 Having heard evidence from the surveillance
 6 officers, there was a period of about 13 minutes or so
 7 where eyes were lost on the vehicle. Does that accord
 8 with your recollection?
 9 **A. Yes, it felt like longer to be honest but I would
 10 imagine that is about right.**
 11 Q. Was that intensely worrying for the commanders, from
 12 what you could hear broadcast on the radio?
 13 **A. Well there was no sort of commentary from the
 14 commanders. However, if I were in their position, being
 15 that the working strategy was to prevent sort of risks
 16 to members of the public and occupants of shops,
 17 et cetera, I would imagine that would be quite
 18 a stressful period for them.**
 19 Q. You continue if you look at page 2 of your statement, at
 20 the last paragraph, six lines up:
 21 "Once it was confirmed that the vehicle was still
 22 occupied, permission to arrest the subjects was given
 23 from the TFC ..."
 24 Yes?
 25 **A. Sorry, page 2 of the statement?**

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1 Q. Yes, page 2 of the first statement, bottom paragraph,
 2 about six lines up:
 3 "Once it was confirmed that the vehicle was still
 4 occupied, permission to arrest the subjects was given
 5 from the TFC via the team leader, X7."
 6 **A. Yes.**
 7 Q. Did you hear the surveillance team broadcast how many
 8 subjects were in the vehicle?
 9 **A. The officer that recovered the visual, albeit briefly,
 10 of the subject vehicle said there are occupants, "It is
 11 still occupied" I think was the phrase, "It is still
 12 occupied". And that was an immediate State Amber from
 13 our command team via the alpha 1.**
 14 Q. You have used the phrase "still occupied".
 15 **A. Yes.**
 16 Q. That assumes that there had been consistency of
 17 occupation.
 18 **A. Ie the people who drove into the car park are still
 19 within there?**
 20 Q. Yes, and hadn't got out of it?
 21 **A. That it is still occupied by, you know, one or more of
 22 the subjects.**
 23 Q. You didn't get a number of the subjects, less still
 24 their identity?
 25 **A. Not from memory, no.**

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1 Q. On the basis of that information, the strike was called?
 2 **A. Yes.**
 3 Q. Can you recall precisely where your vehicle was at that
 4 point?
 5 **A. When the strike was called --**
 6 Q. Yes.
 7 **A. -- or when we went to State Amber?**
 8 Q. When you went to State Amber?
 9 **A. State Amber, I would have been behind the alpha vehicle.**
 10 Q. Where was the alpha vehicle?
 11 **A. Again, a pub car park comes to mind but we may have been
 12 rolling slowly towards the village. Ie I cannot be any
 13 more precise than that.**
 14 Q. In any event, the pair of you, with charlie following,
 15 I think made it into Jackson Avenue and turned on to the
 16 small car park that is there. Is that right?
 17 **A. Yes.**
 18 Q. Before turning on to the car park, had you been given
 19 a description of where the subject vehicle was?
 20 **A. Yes.**
 21 Q. Who gave you that?
 22 **A. I can't tell you which officer it was. I remember a,
 23 I am assuming it was the officer that saw the vehicle
 24 parked up and then walked -- I think he got out of his
 25 vehicle and walked away, from memory, as though as not**

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1 **to alert the subjects of the vehicle. He would have
 2 given what we refer to as a picture paint of the -- of
 3 where the vehicle was in the car park.**
 4 Q. By this time you were already rolling towards the car
 5 park; is that right?
 6 **A. I believe that would have been realistic to say, yes.**
 7 Q. In your car, was there any discussion as to the roles
 8 that each of you were to perform?
 9 **A. Not from memory.**
 10 Q. Between your car and the alpha car, was there any
 11 discussion as to the roles that those in the alpha car
 12 would perform, relative to those in the bravo car?
 13 **A. Not that I can recall regarding who would do what.
 14 I seem to remember it being suggested that the alpha car
 15 would block the vehicle to the front. What that looked
 16 like, obviously, couldn't be, you know, clarified on the
 17 move, if you like.**
 18 Q. You do remember that this was going to be a nose of the
 19 subject car into the side of the alpha car stop?
 20 **A. Well, no, I didn't know it would look like that because
 21 potentially there is not enough space to achieve that.
 22 Whether it be a broadside across the nose of a vehicle.
 23 Essentially the role of that lead vehicle would be to
 24 stop any forward movement of the subject car.
 25 I remember surveillance commentary picture paint**

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1 **suggesting that there was an exit, a further exit, to**
 2 **the car park directly opposite where the car was**
 3 **pointing. And without looking at the map it is not --**
 4 **it is kind of the opposite entrance to where we came in.**
 5 Q. Did you know that the car was facing nose out of its
 6 parking space?
 7 **A. Yes.**
 8 Q. You knew that before you drove on to the car park?
 9 **A. Yes, as part of the picture paint.**
 10 MR BEER: Sir, I don't know whether that a convenient
 11 moment?
 12 THE CHAIRMAN: Yes.
 13 We will take five minutes.
 14 Hang on there a second if you would and Mrs Shaw
 15 will fetch you.
 16 (3.08 pm)
 17 (A short adjournment)
 18 (3.19 pm)
 19 MR BEER: Thank you, sir.
 20 U2, I think you said that on the approach to the car
 21 park and as you were driving across the car park you
 22 didn't receive any instructions from the OFC, X7, about
 23 the subjects or the vehicle?
 24 **A. I don't recall any.**
 25 Q. No.

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1 You didn't receive any instructions as to the
 2 approach that was going to be taken?
 3 **A. The only thing I can recall is that the vehicle would be**
 4 **blocked in by the alpha car.**
 5 Q. Yes.
 6 Do you know whether any other options were
 7 considered? I mean was there any broadcast or
 8 communication between the alpha, bravo and charlie cars
 9 about:
 10 "How shall we do this, side on, front on, nose to
 11 nose?"
 12 **A. Not to my recollection.**
 13 Q. As you were pulling up at the scene, did you know what
 14 role that you would perform or was it a question of it
 15 being a fluid situation and you would find some work to
 16 do?
 17 **A. Yes, well my initial role would be to deliver the**
 18 **officers from my car into the interception and then**
 19 **support those officers. So that was something that we**
 20 **would practice regularly during training, and would --**
 21 **generally speaking the driver is the last person out of**
 22 **the vehicle, so I would find work.**
 23 Q. Did, to your knowledge, each of the other three officers
 24 in your car know where they would go on the vehicle or
 25 would they be in the same situation? Namely that it was

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1 a dynamic situation and they would find some work to do?
 2 **A. There may have been a briefing between themselves, but**
 3 **my focus at that point was to listen to the surveillance**
 4 **commentary, if there were any surveillance commentary**
 5 **changes, ie the vehicle is moving off, and to**
 6 **concentrate on being in a position to deliver the**
 7 **officers in the car. So I wouldn't get involved in that**
 8 **conversation, as such.**
 9 Q. No. What about communication between your car and the
 10 alpha car about where those in the alpha car were going
 11 to go or not go and therefore where those in the bravo
 12 and charlie cars needed to go. You don't recollect
 13 there was that kind of broadcast?
 14 **A. No.**
 15 Q. When you drove on to the car park, did you see any
 16 members of the public on the car park?
 17 **A. Not to my recollection.**
 18 Q. What were the lighting conditions like as you drove on
 19 to the car park, other than illuminated by your and the
 20 other two vehicles?
 21 **A. It was -- well, it was dark but it was illuminated, as**
 22 **most public car parks are, with the normal kind of**
 23 **sodium street lighting. I could see the cars, clearly,**
 24 **it was not as though they were in shadow.**
 25 Q. You say that you followed the alpha car giving it about

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1 two car lengths distance between you and it; is that
 2 right?
 3 **A. Yes, as we entered the car park, yes.**
 4 Q. As you entered the car park you saw the stolen Audi in
 5 the far right-hand corner facing out; is that right?
 6 **A. Yes.**
 7 Q. At that stage I don't think you could see whether there
 8 were occupants in it; is that right?
 9 **A. No.**
 10 Q. You and the alpha car were approaching it from its
 11 left-hand side, is that right, its nearside?
 12 **A. Yes.**
 13 Q. Did you see the alpha car pull up in front of it?
 14 **A. Yes.**
 15 Q. Did you see it make contact with it?
 16 **A. No.**
 17 Q. In your statement, you say:
 18 "The alpha car stopped in front of the Audi with its
 19 offside touching the front bumper."
 20 Which does tend to suggest contact?
 21 **A. Yes, my version of "contact" would be it would shunt the**
 22 **car. So it was only after the fact that I could tell**
 23 **that they were very close.**
 24 Q. Okay, so you didn't see it move the other car, but you
 25 saw that it was in very close contact with it?

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<p>1 A. Very close proximity to it, yes.</p> <p>2 Q. Were there any signs, as far as you could see, that the</p> <p>3 stolen Audi was running?</p> <p>4 A. No, I couldn't tell.</p> <p>5 Q. Did it have its front lights on?</p> <p>6 A. Not to my recollection.</p> <p>7 Q. Did you see it move forwards or backwards in an attempt</p> <p>8 to escape?</p> <p>9 A. At the point of interception.</p> <p>10 Q. At any point?</p> <p>11 A. No.</p> <p>12 Q. Did you hear its engine rev at any point?</p> <p>13 A. No.</p> <p>14 Q. Did you see the wheels attempt to turn?</p> <p>15 A. No.</p> <p>16 Q. Did you see smoke coming from the exhaust?</p> <p>17 A. No.</p> <p>18 Q. Were there any lights on inside the stolen Audi?</p> <p>19 A. Not to my recollection.</p> <p>20 Q. You say in your statement, if you look at it as well,</p> <p>21 please, at page 3, the top paragraph, about 10 lines in:</p> <p>22 "I stopped my vehicle directly behind the alpha</p> <p>23 vehicle but turned the nose of it slightly into the</p> <p>24 empty space, which was to the nearside of the stolen</p> <p>25 Audi. The officers got out."</p> <p style="text-align: center;">Page 133</p>	<p>1 if you look at the lines within there, that would be the</p> <p>2 natural path of vehicles as you travel through the car</p> <p>3 park. I have turned into a closer position to there.</p> <p>4 So that is probably where I've got the turning in, but</p> <p>5 yes, it is slightly inclined towards -- semantics</p> <p>6 really.</p> <p>7 Q. What you mean is that you were not in the middle of the</p> <p>8 road?</p> <p>9 A. I was not in the middle of the --</p> <p>10 Q. The driving space?</p> <p>11 A. Yes.</p> <p>12 Q. Rather than that the angle of the vehicle was inclined</p> <p>13 towards the offside?</p> <p>14 A. I positioned my vehicle to prevent movement from the</p> <p>15 vehicle out of that gap, because there is a space behind</p> <p>16 the subject vehicle.</p> <p>17 Q. The officers in your vehicle then got out; is that</p> <p>18 right?</p> <p>19 A. Yes.</p> <p>20 Q. Can you recall in what order they got out?</p> <p>21 A. No, generally speaking the doors are opened before the</p> <p>22 vehicle comes to a halt.</p> <p>23 Q. Were the windows or any of them of your vehicle down</p> <p>24 before you came to a stop?</p> <p>25 A. Not to my recollection.</p> <p style="text-align: center;">Page 135</p>
<p>1 Yes?</p> <p>2 A. Yes.</p> <p>3 Q. Could you look at the general firearms bundle 2, please,</p> <p>4 tab 28.</p> <p>5 A. Just bear with me, that is the wrong bundle.</p> <p>6 Q. You should find some doubled up photographs there.</p> <p>7 A. Yes, I've got them.</p> <p>8 Q. If you go forward -- well, in fact if you look at the</p> <p>9 fist two on 565, you said in your statement that you</p> <p>10 turned the nose of your car slightly into the empty</p> <p>11 space.</p> <p>12 A. Yes.</p> <p>13 Q. I cannot see that on the photographs. I mean it looks</p> <p>14 almost parallel to the grass line. Can you see that?</p> <p>15 A. Yes, from this image it does.</p> <p>16 Q. If you go forwards to 575.</p> <p>17 A. Yes.</p> <p>18 Q. I think we can see the best angle there, because the</p> <p>19 helicopter is almost directly behind so you can see both</p> <p>20 the white lines and the grass line and the car.</p> <p>21 That is marginally turned in, sort of five degrees</p> <p>22 or so, isn't it?</p> <p>23 A. Well, yes.</p> <p>24 Q. Is that the position that you left the car in then?</p> <p>25 A. I think probably what I am referring to is the fact that</p> <p style="text-align: center;">Page 134</p>	<p>1 Q. Can you recall the order in which the officers got out</p> <p>2 of the vehicle?</p> <p>3 A. No, I still can't.</p> <p>4 Q. Were you the last out of the vehicle?</p> <p>5 A. Yes.</p> <p>6 Q. If you look at your statement, you say:</p> <p>7 "As I opened my door, I heard a loud crack which,</p> <p>8 through experience, sounded like a conventional firearm</p> <p>9 report."</p> <p>10 A. Yes.</p> <p>11 Q. Yes?</p> <p>12 A. Yes.</p> <p>13 Q. Between you pulling up and applying the handbrake and</p> <p>14 hearing the crack, how long a time was there?</p> <p>15 A. Not very long, not very long. It is a very</p> <p>16 well-rehearsed tactic, so generally speaking I would be</p> <p>17 getting out of the car within a matter of seconds.</p> <p>18 Q. I am thinking in particular of between you pulling up</p> <p>19 and hearing the crack, so a couple of seconds?</p> <p>20 A. I couldn't put a figure on it, but, yes, a matter of</p> <p>21 a couple of seconds at most.</p> <p>22 Q. You say that it sounded like a conventional firearm</p> <p>23 report, yes?</p> <p>24 A. Yes. I heard a bang and what sounded like a very high</p> <p>25 pitched and it -- on reflection, I think it must have</p> <p style="text-align: center;">Page 136</p>

<p>1 been the windscreen breaking.</p> <p>2 Q. You said a very high pitched --</p> <p>3 A. Like, it is difficult to describe it in words. Like</p> <p>4 a bullet going through media, or glass, it was</p> <p>5 an unusual sound but the initial crack, I recognised it</p> <p>6 very clearly as a conventional firearm.</p> <p>7 Q. You said that it was loud, it was clearly audible?</p> <p>8 A. Yes, it was audible to me.</p> <p>9 Q. And obviously to you sounded like a conventional</p> <p>10 firearm?</p> <p>11 A. Yes.</p> <p>12 Q. You I think immediately thought that a shot had been</p> <p>13 fired?</p> <p>14 A. Yes.</p> <p>15 Q. Did you look at the Audi at this point?</p> <p>16 A. My very clear recollection at that point would be best</p> <p>17 described as a flashbulb moment was looking directly</p> <p>18 forward and seeing -- let me just find the pseudonym --</p> <p>19 Whisky 9 at the back of his vehicle.</p> <p>20 Q. At the back of whose vehicle?</p> <p>21 A. Of the alpha vehicle.</p> <p>22 Q. He was at the rear offside of his vehicle?</p> <p>23 A. He was at the rear of his vehicle.</p> <p>24 Q. The rear of the vehicle?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 137</p>	<p>1 A. I can't answer that.</p> <p>2 Q. What you say instead in the statement is that you:</p> <p>3 "... approached the nearside of the Audi with your</p> <p>4 MP5 on aim at the cabin, and observed other members of</p> <p>5 your team struggling with two subjects who appeared to</p> <p>6 be resisting arrest."</p> <p>7 A. Yes.</p> <p>8 Q. Did you see that?</p> <p>9 A. Yes.</p> <p>10 Q. When you saw W9, approaching or standing at the rear of</p> <p>11 the alpha vehicle approaching the stolen Audi, was that</p> <p>12 before or after you approached the nearside of the Audi</p> <p>13 with your MP5 on aim?</p> <p>14 A. That was before.</p> <p>15 Q. Was it before you saw other members of your team</p> <p>16 struggling with two subjects?</p> <p>17 A. That was before.</p> <p>18 Q. Did you see the front windscreen of the stolen Audi?</p> <p>19 A. As I approached the car?</p> <p>20 Q. Yes.</p> <p>21 A. No, I didn't see -- notice anything unusual about it.</p> <p>22 Q. You say that your weapon was on aim --</p> <p>23 A. Yes.</p> <p>24 Q. -- on what object or people was it on aim?</p> <p>25 A. Towards the cabin of the car. The interior of the car.</p> <p style="text-align: center;">Page 139</p>
<p>1 Q. What was he doing there?</p> <p>2 A. Moving towards the vehicle.</p> <p>3 THE CHAIRMAN: Towards the Audi, do you mean?</p> <p>4 A. Towards the -- yes, the red Audi, the stolen Audi.</p> <p>5 MR BEER: What position was he in, was he on aim or carrying</p> <p>6 his weapon in another way?</p> <p>7 A. He was postured with a weapon out, but I can't tell you</p> <p>8 any more, whether he was on aim or not on aim.</p> <p>9 Q. Was he moving?</p> <p>10 A. Yes.</p> <p>11 Q. And at what speed?</p> <p>12 A. I couldn't -- what in miles per hour? I couldn't -- at</p> <p>13 a brisk pace towards the car.</p> <p>14 Q. Not running but moving as fast as he could without being</p> <p>15 running?</p> <p>16 A. Yes, a kind of usual speed for a vehicle interception</p> <p>17 which allows you to take a shot or take the</p> <p>18 circumstances into account.</p> <p>19 Q. You have a very clear recollection of this?</p> <p>20 A. Yes.</p> <p>21 Q. Just look at your statement, please, at page 3. I don't</p> <p>22 think it is there, is it?</p> <p>23 A. No.</p> <p>24 Q. If it is your clear recollection, why is it not in your</p> <p>25 statement?</p> <p style="text-align: center;">Page 138</p>	<p>1 Q. Was the front nearside door of the car open or closed?</p> <p>2 A. I can't remember whether the front nearside door was</p> <p>3 open or closed.</p> <p>4 Q. Was the front nearside window smashed or intact?</p> <p>5 A. I can't recall whether it was smashed or intact.</p> <p>6 Q. Was the rear side door of the Audi open or closed?</p> <p>7 A. I feel as though, from memory, it was open because</p> <p>8 I remember looking into the cabin and seeing that it was</p> <p>9 actually empty. I may have opened the front door as</p> <p>10 well, but again it was quite a fast-moving scenario.</p> <p>11 THE CHAIRMAN: Are you talking now about the front side</p> <p>12 window or the rear side window?</p> <p>13 A. I could see that there were subjects being --</p> <p>14 struggling, one was trying to get up, which was why</p> <p>15 I kicked the leg of one to try and prevent that</p> <p>16 happening and I have a dual responsibility of making</p> <p>17 sure that there is nobody else in the car, and at that</p> <p>18 point it felt as though I was the only one there. So</p> <p>19 I would have -- I will have scanned the front of the</p> <p>20 cabin, I don't know if I opened the door and I don't</p> <p>21 know if the window was broken.</p> <p>22 THE CHAIRMAN: The window you are talking about is the front</p> <p>23 side window?</p> <p>24 A. That is the front of the stolen Audi, yes.</p> <p>25 I clearly remember opening or looking into the rear</p> <p style="text-align: center;">Page 140</p>

1 **seats of the back of the Audi, so I must have opened the**
 2 **door or the door would have been open.**
 3 MR BEER: You would have gone past the front nearside door
 4 of the Audi?
 5 **A. Yes.**
 6 Q. Did you look inside?
 7 **A. Yes, I would have scanned the visible cabin area.**
 8 Q. What did you see?
 9 **A. I -- from memory, I saw the occupant of the driver's**
 10 **seat, he appeared to be struggling with officers on the**
 11 **offside of the vehicle, on the driver side of the**
 12 **vehicle.**
 13 Q. Hold on, I am talking now about the time when you first
 14 got out of the car and you saw W9 at the rear of his own
 15 Audi?
 16 **A. Yes.**
 17 Q. You moved forwards past the door?
 18 **A. Yes.**
 19 Q. Past the front nearside door of the Audi?
 20 **A. Yes.**
 21 Q. You think that you would have looked in. What did you
 22 see then?
 23 **A. A -- some sort of struggle in the driver's seat.**
 24 **Again I am piecing memory together from a very**
 25 **fast-moving circumstances.**

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1 **Would it assist if I talked through how I approached**
 2 **the vehicle?**
 3 Q. If we can just complete this area of the questioning at
 4 the moment.
 5 **A. Yes, of course.**
 6 Q. You saw a struggle with the driver. Who was struggling
 7 with the driver?
 8 **A. It was other officers on the offside of the vehicle,**
 9 **near the driver's door. I was aware of a struggle.**
 10 Q. Did you carry on going to the officers that were
 11 struggling with the two subjects and administer the kick
 12 that you have told us about?
 13 **A. I delivered the kick, continued on to prioritise the**
 14 **cabin of the vehicle because I didn't know what the**
 15 **situation was inside the car. I remember distinctly**
 16 **looking in the back and seeing it was clear and then my**
 17 **priority being to go round to support the officers on**
 18 **the offside of the vehicle with the struggle with the**
 19 **driver.**
 20 Q. If you just look at your statement at tab 1, page 3.
 21 You have events in a slightly different order there. If
 22 you look at the end of the first paragraph, you have the
 23 opening of your door, the loud crack, you approaching
 24 the nearside of the Audi on aim, the no mention of W9.
 25 You then observed other members of your team on your

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1 right-hand side struggling with two subjects. You
 2 obviously going down to them, because you kicked the
 3 thigh area of one of the subjects to stop him getting
 4 up. That had the desired effect.
 5 Then you look into the stolen Audi and notice the
 6 cabin was full of CS irritant. Then you say both the
 7 front and nearside doors were open on the vehicle, you
 8 could see in, see that the car was empty with the
 9 exception of the driver.
 10 Do you see?
 11 **A. Yes, yes.**
 12 Q. Which is correct, the account you have given today or
 13 this one here?
 14 **A. That will be the most accurate, because it was made**
 15 **obviously closer to the time.**
 16 Q. Okay.
 17 If this is the accurate account, my question is:
 18 when you were going past the driver's door of the Audi
 19 to get to your colleagues who were struggling with the
 20 suspects, did you look in then?
 21 **A. Yes. Well, I will have been concerning myself with the**
 22 **car.**
 23 Q. Yes. When you looked in, what did you see then?
 24 **A. When I looked in I saw that the driver appeared to be**
 25 **struggling with officers on the opposite side of the**

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1 **car.**
 2 Q. You are saying today that you looked into the Audi both
 3 before and after you administered the kick?
 4 **A. As I approached the vehicle, I -- it is very easy to --**
 5 **that would have been concurrent activity, it is**
 6 **difficult to write concurrent activity down on a single**
 7 **line, if that makes sense.**
 8 Q. You can use more than one line.
 9 **A. Yes, I understand what you are saying but it appears as**
 10 **a sequence of events, these things would have been**
 11 **happening at around the same time. That is hard to**
 12 **articulate in a statement.**
 13 Q. I understand.
 14 Where were the two subjects who were struggling?
 15 **A. On the floor to the side of the car, to the nearside of**
 16 **the stolen car.**
 17 Q. How far down towards the grass were they?
 18 **A. They were just at the side of the car.**
 19 Q. So by the B pillar?
 20 **A. They were -- I had to transit past them, between them**
 21 **and the car to get round the back.**
 22 Q. Yes, I was not talking about how much space there was,
 23 I was talking about how far down the side of the car
 24 they were.
 25 **A. Well, I would suppose, from recollection, they would**

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<p>1 have been where they kind of were pulled from the car or</p> <p>2 removed from the car.</p> <p>3 Q. Right, one by the entrance/exit to the nearside front</p> <p>4 seat and one by the rear nearside seat?</p> <p>5 A. Well there was a full car parking space, so I don't</p> <p>6 think it was at the foot of the door but it was</p> <p>7 certainly in that sort of area.</p> <p>8 Q. When you looked in, concurrently with administering the</p> <p>9 kick and dealing with one of those two subjects, you saw</p> <p>10 into the Audi?</p> <p>11 A. Yes.</p> <p>12 Q. You say here that you noticed that the cabin was full of</p> <p>13 CS irritant, can you describe what it looked like, the</p> <p>14 cabin?</p> <p>15 A. I can describe what a cabin full of CS irritant looks</p> <p>16 like. I can't recall that particular environment but it</p> <p>17 is generally quite misted up, it just looks like dust in</p> <p>18 the air.</p> <p>19 Q. You say here that you saw officers at the window of the</p> <p>20 driver's door on the offside struggling with the driver.</p> <p>21 Was the door, the driver's door, open?</p> <p>22 A. It was shut. I remember that because of the person sat</p> <p>23 in the driver's seat, it seemed like they were fighting</p> <p>24 with the individuals, the officers at that door via the</p> <p>25 window.</p> <p style="text-align: center;">Page 145</p>	<p>1 Q. Do you know which officers were trying to remove him</p> <p>2 from the interior of the car?</p> <p>3 A. Not from memory, no.</p> <p>4 Q. You moved, as you have said, on aim around the vehicle</p> <p>5 in an anticlockwise direction. Do you mean you went</p> <p>6 round the back of it?</p> <p>7 A. Yes.</p> <p>8 Q. Did you come across another officer then, at the rear --</p> <p>9 A. Yes, it was G6.</p> <p>10 Q. What was G6 doing?</p> <p>11 A. He was covering the rear offside door shouting, "Locked</p> <p>12 doors".</p> <p>13 Q. When you say he was "covering it", holding his weapon</p> <p>14 up --</p> <p>15 A. Holding his gun in a (Inaudible) position.</p> <p>16 Q. And shouting "locked doors"?</p> <p>17 A. "Locked doors".</p> <p>18 Q. Presumably you told him that there was nobody in the</p> <p>19 back?</p> <p>20 A. Yes.</p> <p>21 Q. It was empty in the back and so there was no need for</p> <p>22 him to cover the rear of a car that was empty?</p> <p>23 A. That's correct.</p> <p>24 Q. Did something then happen whilst you were telling him</p> <p>25 this?</p> <p style="text-align: center;">Page 147</p>
<p>1 Q. What, as we now know him to be, Mr Grainger -- how was</p> <p>2 Mr Grainger fighting?</p> <p>3 A. It just looked like his arms were up in the air and it</p> <p>4 had the appearance of him fighting.</p> <p>5 Q. What was he doing to give the appearance of fighting?</p> <p>6 A. His arms were up in the air.</p> <p>7 Q. Was he touching anyone?</p> <p>8 A. I can't specifically say, you know, it is just my</p> <p>9 overall impression was that he was resisting being</p> <p>10 grabbed and so on.</p> <p>11 Q. If I put my arms up in the air, that does not look like</p> <p>12 I am fighting, does it?</p> <p>13 A. Like this. (Indicates)</p> <p>14 Q. So he was moving his hands?</p> <p>15 A. It looked like he was moving.</p> <p>16 I subsequently know why that was the case.</p> <p>17 Q. What do you know subsequently?</p> <p>18 A. That they were trying to remove him from the car, but he</p> <p>19 was incapacitated.</p> <p>20 Q. He had been shot in the chest?</p> <p>21 A. Yes.</p> <p>22 Q. Are you saying that you had misinterpreted actions?</p> <p>23 A. Yes, in that case it gave the appearance of a struggle</p> <p>24 when in fact it was the officer trying to remove him</p> <p>25 through the window of the car.</p> <p style="text-align: center;">Page 146</p>	<p>1 A. I think it was around that time I was aware that --</p> <p>2 I think I moved back round to the opposite side of the</p> <p>3 car because they couldn't get him out. It look very,</p> <p>4 very tight on that side and there was clearly a number</p> <p>5 of officers congregating around that door. So I moved</p> <p>6 back round to the nearside and I think I may have said</p> <p>7 something like "Get him out this side" or ... my</p> <p>8 intention was to get the sole occupant of the car out of</p> <p>9 the nearside, where there was more space to deal with</p> <p>10 him.</p> <p>11 Q. Before that happened, did you hear anything distinctive?</p> <p>12 A. At some point during that process I have -- I became</p> <p>13 aware that I think somebody said he had been shot.</p> <p>14 Q. I was thinking more about the sound of a shotgun going</p> <p>15 off.</p> <p>16 A. Ah, yes, yes.</p> <p>17 Q. Did you hear that?</p> <p>18 A. Forgive me, yes. Concurrently with all this movement,</p> <p>19 I was aware of a shotgun being discharged deflating</p> <p>20 tyres, I think on the nearside of the vehicle.</p> <p>21 Q. Once or more than once?</p> <p>22 A. Twice, to my recollection.</p> <p>23 Q. Did you know what the sound of it was?</p> <p>24 A. Yes.</p> <p>25 Q. That it was a shotgun?</p> <p style="text-align: center;">Page 148</p>

1 **A. Yes.**
 2 Q. Could you see that they were being fired into the wheel,
 3 the tyre of the car?
 4 **A. No, I could just hear the shotgun being discharged.**
 5 Q. You, I suppose, didn't know for sure why they were being
 6 discharged?
 7 **A. Well the driver was still in the vehicle, so my**
 8 **assumption was that that was still seen as a risk.**
 9 Q. Where did you get that from?
 10 **A. Because there is a space for the vehicle to move behind**
 11 **and this is speaking from my point of view, there is**
 12 **a space for the vehicle to reverse if the driver gained**
 13 **control of the vehicle. There are a number of occupants**
 14 **of the car and officers in a very confined area and that**
 15 **particular officer that deflated the tyres, that was**
 16 **their role to ensure that there was no risk to officers**
 17 **from the vehicle.**
 18 Q. Did you know that it was him that was firing the
 19 shotgun?
 20 **A. No. I didn't know who was firing it, because obviously**
 21 **you have got a number of people --**
 22 Q. You wouldn't necessarily know that it was fired at the
 23 tyres, would you?
 24 **A. Yes, because it is not an antipersonnel weapon. We only**
 25 **use Hatton or RAM for deflation of tyres.**

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1 Q. In your statement you just say:
 2 "Whilst this was happening I was aware of two
 3 distinct bangs which experience told me was from RAM
 4 rounds from the shotgun."
 5 Not that you knew that that was therefore the tyres
 6 being deflated and that was therefore because of a risk
 7 to everyone because the driver was still in the vehicle?
 8 **A. I may not have articulated the latter, however it is**
 9 **very, very clear as an experienced officer that that**
 10 **would be the case.**
 11 Q. You then made your way back round the rear of the Audi
 12 and came to the nearside passenger door; is that right?
 13 **A. Yes.**
 14 Q. Why did you do that?
 15 **A. Because it was too confined around the driver side and**
 16 **I was providing no support.**
 17 Q. You pointed your gun at him and put your torch on; is
 18 that right?
 19 **A. Yes.**
 20 Q. And shouted "Armed police"?
 21 **A. Yes.**
 22 Q. Was that the first time that anyone had shouted "Armed
 23 police"?
 24 **A. It was the first time I think I had shouted "Armed**
 25 **police".**

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1 Q. Yes, no my question was: was that the first time anyone
 2 had shouted "Armed police"?
 3 **A. I can't recall if other people had been shouting it.**
 4 Q. You don't include that in your statement anywhere that
 5 anyone else had shouted "Armed police" before now?
 6 **A. I wouldn't generally.**
 7 Q. You wouldn't?
 8 **A. What, that other people had shouted "Armed police"?**
 9 Q. Yes.
 10 **A. No.**
 11 Q. Why would you not record that in a narrative of events?
 12 **A. It is not something I would record out of --**
 13 Q. I know that, but why?
 14 **A. Because I would only comment on my own actions or**
 15 **observations, and if I had not observed it, I don't**
 16 **remember it, I wouldn't have written it.**
 17 Q. Hold on, there are about three things in there that you
 18 have said.
 19 **A. Okay.**
 20 Q. You said lots of things in the statement that are not
 21 your actions. Yes?
 22 **A. Yes.**
 23 Q. So you do write things in your statement that are not
 24 your own actions, yes?
 25 **A. Yes.**

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1 Q. Why would you not include that you heard another officer
 2 shout "Armed police" as a warning to a subject?
 3 **A. It is just not something that I would write in my**
 4 **statement.**
 5 Q. Why?
 6 **A. I can't give you an answer to that, other than it is not**
 7 **something I would write in. If it was significant, as**
 8 **in there was a reaction from the subject when that was**
 9 **shouted, then maybe I would write it, but if it is a --**
 10 **as per training delivery of a tactic, everybody would**
 11 **generally be shouting it at some stage either to gain**
 12 **attention or to identify themselves as police officers**
 13 **that are armed.**
 14 Q. In this case we may hear evidence from the two other
 15 subjects in the car that there wasn't a warning
 16 delivered beforehand, yes, before a shot was fired at
 17 Mr Grainger.
 18 **A. Sorry, you will have to repeat that.**
 19 Q. Yes, we may hear evidence in due course from two other
 20 subjects in the car, Mr Totton and Mr Travers, that
 21 there wasn't a warning delivered before Mr Grainger was
 22 shot. Yes?
 23 **A. You may.**
 24 Q. Yes. You are, on your statement, not in a position to
 25 contradict that, are you?

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<p>1 A. I didn't hear anybody challenge the occupants of the car 2 from any car, so I couldn't -- 3 Q. The fact that it is not in your statement is because you 4 didn't hear it? 5 A. Yes. 6 Q. Right. 7 A. Yes. 8 Q. Not because you wouldn't write it in because it is 9 normal practice for it to occur and therefore there is 10 no necessity to write it in? 11 A. Correct. 12 Q. Okay. 13 You shouted "Armed police" and the officers were 14 still struggling to extract him through the offside of 15 the vehicle? 16 A. Yes. 17 Q. Therefore you said, "Get him out this side"? 18 A. Yes. 19 Q. Did the officers holding on to Mr Grainger release their 20 grip of him? 21 A. I am assuming that is what has occurred, as one of the 22 driver's -- the driver's left arm fell sort of down 23 across the centre console of the car. 24 Q. Yes, I am just reading from your statement which says, 25 "Officers released their grip of the subject".</p> <p style="text-align: center;">Page 153</p>	<p>1 Q. Sorry? 2 A. It wouldn't be normal to tell people you had discharged 3 a weapon or shout that I had fired a shot or -- 4 Q. You were still approaching this that, before this time, 5 that the shot that you heard could have equally been the 6 subjects firing at police officers or a police officer 7 firing at the subjects? 8 A. Yes, in the kind of frankest way possible, it is a shot 9 had been fired, I don't know who from or who towards. 10 That was the sum of it really. 11 Q. Just tell us why it is not normal if a police officer 12 fires a shot to shout something out, so other people 13 know that it is not the subjects firing on them, it is 14 the police officers shooting a member of the public? 15 A. If an officer has to take a shot, it is generally 16 because they believe that it is a lethal force encounter 17 and life is at risk and personally speaking that is 18 a very, very, very stressful, very, very -- well, 19 stressful environment to be in. So, generally speaking, 20 you would deal with a threat first and then, once that 21 threat had been dealt with, you would then identify 22 that, you know, that the subject has been shot but 23 usually that is quite evident. As was in this case. 24 Q. You then let go of your MP5 so it hung on its sling; is 25 that right?</p> <p style="text-align: center;">Page 155</p>
<p>1 A. Yes. 2 Q. He fell back on to his seat; is that right? 3 A. Yes. 4 Q. Did you see something that appeared to be black in his 5 left hand? 6 A. Yes, my -- obviously the movement of his arm, falling 7 across the centre console drew my eye to his -- I think 8 it would have been his left hand. Initially it had the 9 appearance of something black in his hand, which 10 prompted me to ... I think I challenged him again. 11 I then identified that quickly with the torch in my 12 weapon as a glove. 13 Q. Did you then hear someone shout, "He has been shot"? 14 A. Yes, I think that was the moment. 15 Q. Do you know who shouted that? 16 A. No. 17 Q. Before that time, did you know that Mr Grainger or 18 anyone else had been shot? 19 A. No. 20 Q. Had anyone shouted that they had discharged their 21 weapon? 22 A. No. 23 Q. Any police officer? 24 A. No. 25 That wouldn't be normal to do that anyway.</p> <p style="text-align: center;">Page 154</p>	<p>1 A. Yes. 2 Q. And leant into the car and pulled Mr Grainger out? 3 A. Yes, my priority at that stage is the welfare of the 4 subject that has been shot. 5 MR BEER: Sir, I am now about to adduce some evidence in 6 relation to the trauma care provided to Mr Grainger, 7 which does include some relatively graphic descriptions 8 of what was done. 9 THE CHAIRMAN: Yes, and it may be that those close to 10 Mr Grainger may wish not to be present during it. 11 MR BEER: It is entirely a matter for them, but -- 12 THE CHAIRMAN: Of course it is, but it is right of you to 13 announce that at this stage so they can take an informed 14 decision. 15 MR THOMAS: We are okay. 16 THE CHAIRMAN: Right. 17 MR BEER: Did you take hold of Mr Grainger by his upper 18 clothing and pull him across the passenger seat? 19 A. Yes. 20 Q. Was he lifeless? 21 A. Yes, I actually couldn't pull him over the centre 22 console, just due to his lifeless weight. So I was 23 assisted by another officer. 24 Q. Did you shout out "Support" and another officer lean 25 over you to help you pull him out?</p> <p style="text-align: center;">Page 156</p>

<p>1 A. Yes, I think that was --</p> <p>2 Q. V3?</p> <p>3 A. Yes.</p> <p>4 Q. Did G11 also join in to help?</p> <p>5 A. Yes, I distinctly remember V3 and I am pretty confident</p> <p>6 G11 was there as well.</p> <p>7 Q. Did you pull Mr Grainger across the front seat, lay him</p> <p>8 on his back next to the nearside of the Audi?</p> <p>9 A. Yes.</p> <p>10 Q. Could you see blood on the chest area of Mr Grainger?</p> <p>11 A. He was wearing a jacket which opened and I could see</p> <p>12 a small red mark on a light-coloured T-shirt.</p> <p>13 Q. Did you rip his T-shirt open so that you could see his</p> <p>14 chest?</p> <p>15 A. Yes.</p> <p>16 Q. Did he appear to you to be lifeless?</p> <p>17 A. Yes.</p> <p>18 Q. Were his eyes wide open?</p> <p>19 A. Yes.</p> <p>20 Q. Did you see a small hole about half an inch in diameter</p> <p>21 on his upper chest, left chest?</p> <p>22 A. Yes.</p> <p>23 Q. Was there a small amount of bleeding there?</p> <p>24 A. Yes, just around the site of the entrance wound.</p> <p>25 Q. Did you shout, "He has been shot, trauma, trauma"?</p> <p style="text-align: center;">Page 157</p>	<p>1 A. No.</p> <p>2 Q. Did you shout for an officer to get some scissors so you</p> <p>3 could cut Mr Grainger's clothing away?</p> <p>4 A. Yes, just to assess for further wounds.</p> <p>5 Q. Did G6 arrive with some scissors and begin to cut the</p> <p>6 clothing away?</p> <p>7 A. I believe so.</p> <p>8 Q. Did you find any other wounds?</p> <p>9 A. No.</p> <p>10 Q. Had by this time V3 begun chest compressions?</p> <p>11 A. Yes.</p> <p>12 Q. Did you see any signs of life at all from Mr Grainger?</p> <p>13 A. No, the only sign if you like that I saw from him was</p> <p>14 like an exhale during the care of him.</p> <p>15 Q. Was that one loud exhale of breath?</p> <p>16 A. Yes.</p> <p>17 Q. Did you assist in breathing for Mr Grainger through the</p> <p>18 oxygen mask concurrently with other officers delivering</p> <p>19 the chest compressions?</p> <p>20 A. Yes, for a period of time.</p> <p>21 Q. You say that G6 applied an Asherman chest seal, what is</p> <p>22 that?</p> <p>23 A. It is a particular bandage that goes over specifically</p> <p>24 chest wounds which allows the escape of any air which</p> <p>25 can, if the subject is alive, or the person is alive, it</p> <p style="text-align: center;">Page 159</p>
<p>1 A. Yes.</p> <p>2 Q. Was that to prompt other officers to get the trauma kit</p> <p>3 from the cars?</p> <p>4 A. Yes.</p> <p>5 Q. Did you put some pressure on the wound with your hand?</p> <p>6 A. Yes.</p> <p>7 Q. Did another officer apply an emergency bandage, allowing</p> <p>8 you to fix an oxygen mask?</p> <p>9 A. Yes.</p> <p>10 Q. Did you see J4 insert an airway into Mr Grainger's</p> <p>11 mouth?</p> <p>12 A. Yes, this was all concurrent activity.</p> <p>13 Q. Yes. Did you check for a pulse at the neck?</p> <p>14 A. Yes.</p> <p>15 Q. Could you find one?</p> <p>16 A. No.</p> <p>17 Q. Throughout this, did Mr Grainger's eyes remain open?</p> <p>18 A. Yes.</p> <p>19 Q. Were his pupils fixed and dilated?</p> <p>20 A. When I looked at them with a torch light they were fixed</p> <p>21 and dilated.</p> <p>22 Q. Did you shine the torch light into his eyes to check for</p> <p>23 that?</p> <p>24 A. Yes.</p> <p>25 Q. Was there any movement at all in his pupils?</p> <p style="text-align: center;">Page 158</p>	<p>1 allows that air to escape and prevent further</p> <p>2 complications.</p> <p>3 Q. Did G6 then take over your role at Mr Grainger's head?</p> <p>4 A. Yes.</p> <p>5 Q. At some stage, did an ambulance arrive?</p> <p>6 A. Yes.</p> <p>7 Q. Did you tell them what had happened, ie that there was</p> <p>8 a single chest wound, yes?</p> <p>9 A. Yes. Yes.</p> <p>10 Q. You say that you used the mnemonic "MISS" to explain to</p> <p>11 the paramedic what had happened. What does that mean?</p> <p>12 A. It is just a way of remembering how ambulance staff need</p> <p>13 to know information, it stands for, "Mechanism of</p> <p>14 injuries, signs and symptoms" and any treatment I have</p> <p>15 given. It is just something they are familiar with and</p> <p>16 it allows a prompt handover to definitive pre-hospital</p> <p>17 care.</p> <p>18 Q. Did the paramedic then take over the care of</p> <p>19 Mr Grainger?</p> <p>20 A. Yes.</p> <p>21 Q. Did you subsequently hear G6 say that the paramedic</p> <p>22 could confirm that Mr Grainger was dead?</p> <p>23 A. Yes.</p> <p>24 Q. Subsequently, did you go to the Claytonbrook complex to</p> <p>25 take part in a post-incident procedure?</p> <p style="text-align: center;">Page 160</p>

1 **A. Yes. We were there for some time but then we were**
 2 **released to go to the post-incident procedure.**
 3 Q. Was it in the course of that that you made your first
 4 account?
 5 **A. It will have been at the post-incident suite.**
 6 Q. Did you go out of the room in which all of the AFOs were
 7 in order to make that first account?
 8 **A. I can't recall.**
 9 Q. Your recollection is that you handed that first account
 10 to the post-incident manager, or one of them?
 11 **A. No, my recollection is that I don't know who I handed it**
 12 **to. It was just -- it would have been produced and**
 13 **I don't know who it was handed to specifically.**
 14 MR BEER: Yes, thank you very much. They are the questions
 15 I ask.
 16 THE CHAIRMAN: Mr Thomas.
 17 MR THOMAS: Thank you, sir.
 18 Questions from MR THOMAS
 19 MR THOMAS: U2, my name is Mr Thomas. I represent
 20 Mr Grainger's family, his mum sits next to me.
 21 I have a few questions for you, if I may.
 22 Can I just start with, just some general duties that
 23 you were under as a police officer. You have said that
 24 you started in the police force in 2000?
 25 **A. Yes, that's right.**

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1 Q. You became a firearms officer in 2003?
 2 **A. Yes.**
 3 Q. It is right, isn't it, that as a firearms officer, you
 4 would have been well schooled in the requirements of
 5 article 2 and the right to life?
 6 **A. Yes.**
 7 Q. Can you just -- I want to take a step back, by the way
 8 I am not going to repeat or go over all the ground that
 9 Mr Beer has covered with you but just clarify one or two
 10 points.
 11 **A. Okay.**
 12 Q. Can we just take a step back and can I ask you this.
 13 You and your colleagues -- this is on the 3rd, when you
 14 are near the car park, and there comes a period when
 15 eyes are lost on the subject. We now know that the
 16 subject car had been parked up in the car park from
 17 about 6.30 and we know that the strike is not called
 18 until 7.08, 7.10 according to you, where you say State
 19 Amber is called around that. So there is about some 40
 20 minutes or so, okay?
 21 **A. Yes.**
 22 Q. All right. We know eyes are lost for some 13 minutes or
 23 so. Can you just help us with this. What were you and
 24 your colleagues discussing in that 40 minutes or so
 25 before you went on to the car park, because it was quite

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1 a long time?
 2 **A. Yes, an uncomfortably long time.**
 3 **The general feeling would have been, "What is**
 4 **happening in the car park?"**
 5 Q. Right.
 6 You would have been told, and I think you have
 7 already agreed this with Mr Beer, the car is in the car
 8 park, let's forget about the subjects and whether or not
 9 you have eyes on the subject for the moment, but you
 10 would have been told the car is in the car park and it
 11 is positioned in this way, it is reversed in, so it is
 12 facing out, et cetera, et cetera. You would have been
 13 given that information and I think you have confirmed
 14 that you were given that information, right?
 15 **A. We were certainly given that information by the last**
 16 **person to see the car, to confirming the people in.**
 17 **I can't --**
 18 Q. Forgive me.
 19 Can I just clarify that, are you saying that it
 20 wasn't until the last person, I think it was Mr Evans --
 21 I may have that wrong, it was either Evans or Wallace,
 22 one of those two, they were the two surveillance
 23 officers, it matters not which one. Are you saying it
 24 is not until after 7.00 in the evening you were told the
 25 positioning of the car? Because the car had been there

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1 since 6.30.
 2 **A. Yes, I understand. I believe it was -- you have just**
 3 **reminded me. I think it was a Mr Wallace initially took**
 4 **the car into the car park and gave some idea of where**
 5 **that vehicle was positioned. Then there was**
 6 **a subsequent gap and then there was a confirmation by**
 7 **Mr Evans regarding the position of the vehicle.**
 8 Q. Well, at 18.45, the car, I think the first spot if I can
 9 call it that -- you know what I am talking about?
 10 **A. Yes.**
 11 Q. Talks about the position of the car. The point I am
 12 trying to make with you is that very early on, even
 13 though you may not have realised where the subjects were
 14 or whether the subjects were in the vehicle, you knew
 15 the positioning of the vehicle, certainly by 18.45. Do
 16 you follow?
 17 **A. Yes, forgive me, I don't know the specific time but yes.**
 18 Q. Don't worry, if I've got the times wrong I will be
 19 corrected, all right, but by 18.45 I am suggesting you
 20 would have known the positioning of the vehicle. In
 21 other words it had reversed into that spot with its nose
 22 facing out, yes?
 23 **A. Yes.**
 24 Q. That is important, isn't it? The fact that the vehicle
 25 had its nose pointing out -- I think you have indicated

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<p>1 to the chairman that there was another exit to the car 2 park in front of it. That is all important information 3 for your team, isn't it?</p> <p>4 A. Yes.</p> <p>5 Q. Right.</p> <p>6 Can I come back to the question I started with.</p> <p>7 There is a significant period of time where you and your 8 colleagues are very nearby, what are you discussing? 9 Surely there must have been a plan being developed, 10 isn't there?</p> <p>11 A. What if the vehicle drives off? We are aware that the 12 concern at that stage, from memory, is that -- was the 13 vehicle occupied? And that was what the surveillance 14 team were at pains to reveal.</p> <p>15 Q. All right. Okay.</p> <p>16 U2, I have understood your evidence correctly, you 17 say we were there for that period of time but we were 18 not discussing a plan as to -- what I mean by "plan" is, 19 who is going to do what, who is going to go where. You 20 were not doing that?</p> <p>21 A. Not to my recollection and I would discourage it at that 22 stage because the circumstances in the car park may 23 change.</p> <p>24 Q. Not even to have a contingency plan?</p> <p>25 A. You are planning for something that is a time off, so we</p> <p style="text-align: center;">Page 165</p>	<p>1 a contingency.</p> <p>2 Q. All right, so it is a contingency. What is it 3 contingent upon?</p> <p>4 A. If the driver poses a threat within the vehicle or the 5 occupants of the vehicle from some other means, whether 6 it be a weapon or otherwise, present a threat. It is to 7 incapacitate the occupants of the vehicle.</p> <p>8 Q. Can I just break that down, if I may?</p> <p>9 A. Of course.</p> <p>10 Q. If I have understood your last answer it wasn't 11 inevitable that the canister was going to be used, 12 correct?</p> <p>13 A. Absolutely not.</p> <p>14 Q. But it would be contingent on the driver being a threat, 15 doing -- the driver or the occupants would have to do 16 something which would justify the use of it. That is 17 why it was contingent, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Yes. That is your evidence, is it?</p> <p>20 A. Yes.</p> <p>21 Q. Such as what?</p> <p>22 A. It could be anything from resisting arrest through the 23 window of a car and trying to get the car started, it 24 could be driving the car at officers, it could be 25 a member of the other people in -- within the car</p> <p style="text-align: center;">Page 167</p>
<p>1 have got a total loss of the vehicle's observations, so 2 it may have moved and that was what we were waiting for 3 in that period of time.</p> <p>4 Q. Was there a sense of panic amongst you because eyes had 5 been lost, you know, this was an operation that had been 6 in the planning for months?</p> <p>7 A. Yes.</p> <p>8 Q. This was the culmination, you were reaching the climax, 9 all right, you were all there, armed and ready to go and 10 eyes had been lost. Was there a sense of panic, "Good 11 grief, we have messed this one up"?</p> <p>12 A. Absolutely not.</p> <p>13 Q. Okay.</p> <p>14 Let me come back then to the actual execution of the 15 strike, if I can use that expression. This is the next 16 thing I want you to help me with. We know that the CS 17 canister had been authorised to be used --</p> <p>18 A. Yes.</p> <p>19 Q. -- amongst your senior colleagues, correct?</p> <p>20 A. Yes.</p> <p>21 Q. All right.</p> <p>22 Did you know what the plan was in relation to the 23 CS? Did you know what the plan was in relation to the 24 use of the canister? Was it going to be used?</p> <p>25 A. It may or may not be used depending on -- it is</p> <p style="text-align: center;">Page 166</p>	<p>1 pointing the gun at somebody or --</p> <p>2 Q. Okay, some action?</p> <p>3 A. Yes.</p> <p>4 Q. Some action?</p> <p>5 A. For me the primary function is to stop the car driving 6 off.</p> <p>7 Q. I understand, some action.</p> <p>8 Could you help the chairman with this. What you 9 have just told us about it being contingent on some 10 action, and you have given us some examples. Was that 11 known amongst the rest of the teams?</p> <p>12 A. Yes, that was part of the training.</p> <p>13 Q. Well, hang on a second. Can I break that down.</p> <p>14 A. Yes.</p> <p>15 Q. When you say it is part of the training --</p> <p>16 A. Yes.</p> <p>17 Q. -- are you saying it is just the training that would 18 have informed the others, so you have to assume 19 everybody has gone on the same training and understood 20 it, because that is one thing, or was it discussed? On 21 the day, obviously.</p> <p>22 A. No, the contingency of RAM rounds for the tyres or CS 23 munitions for within the car is a contingency. If the 24 officer decides to use that contingency, based on their 25 assessed level of threat, then that is for them to</p> <p style="text-align: center;">Page 168</p>

<p>1 justify and that is very clear during our training.</p> <p>2 Q. Right.</p> <p>3 If I have understood your evidence, contingent,</p> <p>4 everybody should know this, and it is based on the</p> <p>5 training?</p> <p>6 A. Yes.</p> <p>7 Q. Help the chairman with this next question, what is the</p> <p>8 purpose behind using CS spray, the canister, what is the</p> <p>9 purpose?</p> <p>10 A. To incapacitate the occupants of the car, to stop them</p> <p>11 doing whatever they are doing.</p> <p>12 Q. Within the car?</p> <p>13 A. Yes.</p> <p>14 Q. Would you agree with the following propositions. The</p> <p>15 use of the canister, the CS canister, on a subject</p> <p>16 incapacitates them by causing them to choke, cough,</p> <p>17 splutter, it affects respiration. That is what CS does,</p> <p>18 correct?</p> <p>19 A. Yes.</p> <p>20 Q. Their eyes stream, nose runs, eyes burn that sort of</p> <p>21 thing, yes?</p> <p>22 A. Yes.</p> <p>23 Q. A number of involuntary movements that you get from that</p> <p>24 because, you know, you might try to rub your eyes, your</p> <p>25 hands go to your face that sort of thing?</p> <p style="text-align: center;">Page 169</p>	<p>1 are going --</p> <p>2 A. Well hands are generally where guns appear.</p> <p>3 Q. Sorry?</p> <p>4 A. Hands are usually -- that is something that I look for,</p> <p>5 hands and elbow movements.</p> <p>6 Q. Sorry, U2, but it is a simple point I am making. If you</p> <p>7 are affected by CS canister, right, you are going to do</p> <p>8 a number of involuntary movements. We just talked about</p> <p>9 them.</p> <p>10 A. Generally the hands go to the face.</p> <p>11 Q. Right. It is an involuntary movement, you yourself</p> <p>12 talked about going down into the foetal position, so</p> <p>13 that is bending down, covering yourself, isn't it?</p> <p>14 A. Yes.</p> <p>15 Q. That is the hands going out of sight, isn't it?</p> <p>16 A. The hands going to the face.</p> <p>17 Q. You cannot have it both ways, the foetal position is you</p> <p>18 bend over and you go into a ball into the foetal</p> <p>19 position, isn't it?</p> <p>20 A. It doesn't mean hands are out of sight though.</p> <p>21 Q. Not necessarily, but it could mean that, couldn't it,</p> <p>22 you cannot discount it, can you?</p> <p>23 A. It may or may not.</p> <p>24 Q. You cannot discount it, can you?</p> <p>25 A. It may or may not.</p> <p style="text-align: center;">Page 171</p>
<p>1 A. The most common is the sort of the foetal position.</p> <p>2 Q. You go into a ball?</p> <p>3 A. Yes.</p> <p>4 Q. Yes.</p> <p>5 But, there are a number of involuntary movements</p> <p>6 caused by this. What I mean by this, your body just</p> <p>7 reacts, it goes into self-preservation mode because of</p> <p>8 the effect of the canister?</p> <p>9 A. Yes, absolutely.</p> <p>10 Q. Yes.</p> <p>11 You, as a firearms officer, would need to be aware,</p> <p>12 would you agree, that if the canister is going to be</p> <p>13 used, you would be aware that there are these</p> <p>14 involuntary movements. Correct?</p> <p>15 A. Yes.</p> <p>16 Q. You would agree with me, that is important because the</p> <p>17 one thing that you want to ensure as a firearms officer</p> <p>18 when you approach a vehicle with your weapon on aim is</p> <p>19 you want compliance, "Show me your hands", "Don't move",</p> <p>20 because sudden movements, somebody could end up getting</p> <p>21 shot. Do you agree?</p> <p>22 A. I -- sudden movements would not end up with people</p> <p>23 potentially getting shot. It is all in the context of</p> <p>24 that particular scenario.</p> <p>25 Q. Sudden movements where you don't know where the hands</p> <p style="text-align: center;">Page 170</p>	<p>1 Q. You can repeat that a number of times, but you are going</p> <p>2 to try and answer the question.</p> <p>3 A. I understand.</p> <p>4 Q. As a firearms officer, it is not something you can</p> <p>5 discount, is it?</p> <p>6 A. Which?</p> <p>7 Q. That you go into a ball, you bend forwards, so if you</p> <p>8 are in a driving seat you do something like that?</p> <p>9 (Indicates)</p> <p>10 A. Yes, like you demonstrated your hands would generally go</p> <p>11 to your face.</p> <p>12 Q. But your head goes down?</p> <p>13 A. Yes.</p> <p>14 Q. Your head goes down with your hands perhaps out of</p> <p>15 sight?</p> <p>16 A. Yes, potentially.</p> <p>17 Q. Right. Thank you.</p> <p>18 As a firearms officer, that is something that you</p> <p>19 need to be aware of.</p> <p>20 A. Yes.</p> <p>21 Q. Correct?</p> <p>22 Tell me this. The one thing that you haven't</p> <p>23 discussed in your witness statement, or even touched</p> <p>24 upon, is -- and if you go to it, I think it is page 3 of</p> <p>25 your witness statement, this is when the stop goes in.</p> <p style="text-align: center;">Page 172</p>

1 **A. Yes.**
 2 Q. You talk about -- you hear three shots, yes? You hear
 3 the initial shot which sounds like a gunshot report and
 4 then you hear the two shotgun later on, yes?
 5 **A. Yes.**
 6 Q. Right.
 7 What is missing from your statement is this. There
 8 is no indication before, before, the first shot of any
 9 window being smashed. Do you follow?
 10 **A. Yes.**
 11 Q. Yes. We know that, we know that side window of the
 12 vehicle was smashed. We know that, that is not in
 13 dispute because we can see the evidence for ourselves,
 14 but you haven't reported that?
 15 **A. No.**
 16 Q. Right. I will come on to that in a moment but I just
 17 want to take this in context. When you approached the
 18 vehicle, you were unaware that the canister had been
 19 used, correct?
 20 **A. I can't recall if it was full -- if it was fogged, if it**
 21 **was inside the vehicle or not. I will have to refer to**
 22 **my statement on that:**
 23 **"The cabin was full of CS irritant."**
 24 Q. You discover that subsequently, but when you leave your
 25 vehicle, you are unaware that the canister had been

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1 used?
 2 **A. Yes. That would be correct.**
 3 Q. Right, that is because when the canister is deployed --
 4 I am just looking at the tactics, at the moment it is
 5 deployed, and when it is deployed, there is no
 6 indication to the other officers that the canister has
 7 been used. Correct?
 8 **A. The only indication would be a cabin fogging, having**
 9 **seen it operationally occur.**
 10 Q. I understand that, but if you are not in a position to
 11 know, because you didn't know, you didn't see -- you
 12 didn't hear the window smash, by the time you got to the
 13 Audi, it had already been used?
 14 **A. Yes.**
 15 Q. Yes?
 16 **A. My position as driver would generally mean that I would**
 17 **be kind of following on to the rest of the officers.**
 18 Q. I understand that, but you are still somebody with
 19 a weapon?
 20 **A. Yes.**
 21 Q. You are still somebody who is aiming a weapon at the
 22 vehicle?
 23 **A. Yes.**
 24 Q. And potentially, subjects who may be affected by CS
 25 spray, right, as you are approaching the vehicle, right,

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1 and I am just using you as an example because you are
 2 there, as you are approaching the vehicle, if somebody
 3 has been affected by CS gas, they are potentially at
 4 risk if they are making involuntary movements before you
 5 know that a canister has been used. Do you follow?
 6 **A. That is incorrect.**
 7 Q. All right. I am not going to argue with you on the
 8 point.
 9 Let me move on to another issue -- I have nearly
 10 finished by the way.
 11 Can I just make sure and go through the sequence
 12 with you. The one thing we can agree on is this.
 13 I believe you had in your vehicle X9?
 14 **A. Yes.**
 15 Q. We know -- because we just heard from him -- that X9 was
 16 the officer with the CS gas canister who used it on this
 17 occasion?
 18 **A. Yes.**
 19 Q. Right.
 20 By the time you got out of your vehicle, and you
 21 indicated to the chairman that you got out very quickly.
 22 **A. Yes.**
 23 Q. Yes? It was a matter of seconds before you reached
 24 there?
 25 **A. Yes.**

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1 Q. By the time you got out, the vehicle window had already
 2 been smashed and the CS canister had already been
 3 deployed?
 4 **A. It would appear so.**
 5 Q. Yes?
 6 **A. Yes.**
 7 Q. What you cannot assist us with is the shot, the very
 8 first shot that you heard. You said that was a couple
 9 of seconds after you had pulled up, is that correct,
 10 have I understood your evidence correctly?
 11 **A. Yes, from memory it was -- I opened, as I was opening**
 12 **the door, I have heard the crack.**
 13 Q. Yes, but by the time you were opening the door, what we
 14 already know is X9, who was in your vehicle, has already
 15 got to the Audi and the window is already smashed?
 16 **A. That wouldn't fit with the timeline of events, as you**
 17 **see it.**
 18 Q. You say that, can I test it. We know that by the time
 19 you get to the Audi, the glass has been smashed?
 20 **A. I am not disputing that X9 got to the car before me,**
 21 **however the first car to stop was the alpha car and**
 22 **an occupant from that car was not at the vehicle when**
 23 **I heard the shot.**
 24 Q. Bear with me.
 25 **A. Okay.**

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<p>1 Q. Bear with me. 2 What we can agree on is this. These are the facts 3 according to your own evidence? 4 A. Yes. 5 Q. You don't hear the shot before you stop, correct? 6 A. Correct. 7 Q. The shot you hear is after you have stopped, you said it 8 was a couple of seconds after you had stopped, that was 9 your evidence? 10 A. Yes. 11 Q. We have already heard evidence from X9, he gets -- 12 THE CHAIRMAN: Just on a point of, it is a couple of seconds 13 at most was the evidence. 14 MR THOMAS: At most. 15 But after you have stopped, right? 16 We have already heard evidence from X9 that he is 17 out of your car before you stop, as you are pulling up 18 he is jumping out. That is a normal tactic, isn't it? 19 A. Yes. 20 Q. Yes. 21 You go to the vehicle -- when you have pulled up you 22 hear a shot, you go to the vehicle and you report what 23 you have already told Mr Beer which I am not going to go 24 over? 25 A. Yes.</p> <p style="text-align: center;">Page 177</p>	<p>1 driver, that was your primary role? 2 A. Yes. 3 Q. Can you just help me with this. It may be nothing turns 4 on it, but I won't know until I ask. 5 During the briefing there is a passage where it is 6 said, I think by X7, that you are to be bravo driver and 7 then there is mention of a launcher? 8 A. Yes. 9 Q. Can you help us with that? 10 A. Yes, it is a baton launcher, it is a less lethal 11 capability for the team. 12 Q. I don't think we have heard about that, so you were 13 deployed with a baton launcher? 14 A. It would be something for me to take as part of my 15 weapons. 16 Q. Right. 17 A. Purely as a contingency for a less lethal option should 18 we move to an external or building option. 19 Q. Right. So it is not relevant to a vehicle strike? 20 A. No. 21 Q. Right. I shall leave that where it is then. 22 Secondly, and swiftly, I think the period that the 23 Audi was on the car park, prior to Amber being called -- 24 A. Yes. 25 Q. -- was a period of about 25 minutes. As we have heard,</p> <p style="text-align: center;">Page 179</p>
<p>1 Q. All right. 2 Just bear with me one second. 3 Oh, something that you have not touched upon. Were 4 you aware that the Audi had tinted windows? 5 A. Only on approach, from memory. I don't remember it 6 being given as part of the surveillance commentary. 7 Q. Yes, so the first you know that this is a vehicle with 8 tinted winds is when you are putting in the strike? 9 A. From memory. I may be incorrect there but from memory, 10 I don't remember that specifically coming out on the 11 surveillance commentary. 12 Q. There is no mention of it in any of your witness 13 statements that you had been briefed that this was 14 a vehicle with tinted windows, is there? 15 A. No, so that would suggest ... 16 MR THOMAS: No. 17 Thank you, sir. That is all I ask. 18 THE CHAIRMAN: Mr Weatherby? 19 MR WEATHERBY: Yes, thank you. 20 Questions from MR WEATHERBY 21 MR WEATHERBY: Just a few questions from me, officer. 22 I represent Mr Grainger's partner. 23 I am being asked just to turn this around, that will 24 make it easier. 25 Just in terms of role, obviously you were bravo</p> <p style="text-align: center;">Page 178</p>	<p>1 for at least 13 of those minutes eyes were lost? 2 A. Yes. 3 Q. You have graphically told us that it felt longer -- 4 A. Yes. 5 Q. -- and that this was a stressful period, yes? 6 I think you said particularly stressful for the 7 commanders? 8 A. Yes, I think, certainly from my point of view, there was 9 a great concern that there would be members of the 10 public or commercial premises where there tend to have 11 been, you know, attacked. So I think that was where the 12 stress came from. 13 Q. Yes. You have told us that you were particularly 14 listening to the surveillance feed, yes? 15 A. Yes. 16 Q. Also I think you had a firearms feed, so you had two 17 communications? 18 A. Yes, there is a back-to-back channel. 19 Q. Yes, can you help us with that. During this stressful 20 period did you hear Mr Granby over the feed? 21 A. Not to my recollection at all. 22 Q. Not to your recollection? 23 A. No. 24 Q. When you say that the commanders, it was a stressful 25 period for the commanders, that is a supposition by you</p> <p style="text-align: center;">Page 180</p>

1 rather than something which you actually heard?
 2 **A. Yes, it definitely is.**
 3 Q. You didn't hear X7 over the radio during this period?
 4 **A. Not to my recollection.**
 5 Q. Just before we move on to my last topic, just sticking
 6 with the operation itself, you were deployed on to the
 7 car park and you were, as you have told us, a couple of
 8 car lengths behind alpha.
 9 **A. Yes.**
 10 Q. As you drove on to the car park, what kind of speed was
 11 alpha and yourself going at -- I am not talking miles
 12 per hour here?
 13 **A. It is a relatively slow speed. The objective is to**
 14 **remain covert until the very last moment, so normal car**
 15 **park speed if you like.**
 16 Q. I'm sorry, I cut over you then. So a normal speed?
 17 **A. Yes.**
 18 Q. So there is no speeding up as you got there or going on
 19 to the car park and speeding up, it is just go on to the
 20 car park at normal speed, come to a stop?
 21 **A. It is a very deliberate sort of movement and stop within**
 22 **the car park.**
 23 Q. Right. Right, is that both cars or --
 24 **A. I can only speak for my car but obviously I have to keep**
 25 **in sync with the vehicle in front of me, so.**

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1 Q. You could see alpha car, so you can speak about alpha
 2 car, can't you?
 3 **A. I didn't have to accelerate to keep up with the alpha**
 4 **car, it moved in the kind of speed I anticipated.**
 5 Q. I just want to ask you a few more questions about the
 6 statements.
 7 You have already been asked, so I won't repeat it,
 8 about the MG11. Of course we know about the MG11, the
 9 initial account from your pocket notebook, yes?
 10 **A. Yes.**
 11 Q. You have told us you cannot remember who you gave it to?
 12 **A. No.**
 13 Q. It would be right that you did give to somebody?
 14 **A. Absolutely. If I produced it, it would have been part**
 15 **of the investigation requirement.**
 16 Q. Am I right, you first of all go to Openshaw from the
 17 scene and then you go to Claytonbrook. Is that right?
 18 **A. Forgive me, with the timeline of events I am not**
 19 **entirely certain whether it was Openshaw first, in fact**
 20 **yes it was, that is correct.**
 21 Q. Yes, so you go to Openshaw and then you go to
 22 Claytonbrook?
 23 **A. Yes.**
 24 Q. Can you tell us, can you remember, can you help us,
 25 whether it was Openshaw or Claytonbrook that you wrote

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1 the statement?
 2 **A. It was a -- the extended period of time was over at**
 3 **Claytonbrook. The preferred place for the post incident**
 4 **from the team members was Openshaw, because they are**
 5 **familiar surroundings, phones, et cetera, and I seem to**
 6 **remember at that point there was only a kind of people**
 7 **recovering from what was a very stressful incident and**
 8 **then maybe having a cup of tea. So I don't remember any**
 9 **paperwork being carried out at that stage. So I would**
 10 **edge to say that it was over at Claytonbrook.**
 11 Q. So over at Claytonbrook?
 12 **A. Yes.**
 13 Q. Okay, so you think that you made the statement at
 14 Claytonbrook, and you gave it to a senior officer?
 15 **A. Part of the investigation team.**
 16 Q. Part of the investigation team, but beyond that you
 17 cannot help us?
 18 **A. No, I am sorry.**
 19 Q. Have you ever seen that before -- sorry, again? Have
 20 you ever seen the MG11 again?
 21 **A. No.**
 22 Q. When you were first asked about it this afternoon by
 23 Mr Beer, correct me if I am wrong, you appeared to be
 24 a little surprised that it was not available?
 25 **A. I was surprised to see that it was not in a bundle and**

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1 **I was asked the question prior to this, my evidence**
 2 **today, about where that item is, if I could reveal where**
 3 **that item is. And I couldn't shed any further light on**
 4 **it and when I was asked to explain it, it is a very**
 5 **clear process for me that if you have been involved in**
 6 **that type of incident that you provide an initial duty**
 7 **statement prior to retiring from duty that day, or that**
 8 **tour of duty.**
 9 Q. You clearly did, because of the pocket notebook entry?
 10 **A. Yes, I wouldn't have written it to corroborate that, it**
 11 **is unusual for me to write in the pocket notebook in**
 12 **that sense.**
 13 Q. You cannot help us further on that?
 14 **A. My apologies.**
 15 Q. Next on the actual process on 9 March, six days, a long
 16 time, between the initial account and the next account.
 17 Has that ever happened in another significant
 18 investigation or operation in your experience?
 19 **A. Yes. There is frustratingly long delays between the**
 20 **event and an actual statement being written. Which**
 21 **seems to be governed by -- more by investigative bodies,**
 22 **without wanting to criticise any particular one, I think**
 23 **we know which one I am referring to.**
 24 Q. You are referring to the IPCC?
 25 **A. Yes.**

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1 Q. So it was the IPCC's fault that you didn't write your
 2 substantive or substantial statement until 9 March, was
 3 it?
 4 **A. There was a -- from memory, quite a significant toing
 5 and froing of when we would provide that statement and
 6 my general overview feeling was that everybody within
 7 the operation wanted to write down that account as soon
 8 as possible, because they didn't want to forget any
 9 relevant details, which is perfectly reasonable I think.**
 10 Q. Was there anything stopping you writing a more
 11 substantial statement, for example, than your MG11, for
 12 example on another MG11 or in your pocket notebook or in
 13 a statement form? Was there anything stopping you doing
 14 that earlier in the process?
 15 **A. Apologies for overspeaking you. I don't remember being
 16 told not to, but it was deemed that that -- we would
 17 wait to provide that account, which, you know, is quite
 18 frustrating when you want to write your statement as
 19 soon as possible after an incident to avoid obviously
 20 with a due regard for people recovering from
 21 a stressful --**
 22 Q. Yes, I am not quibbling about an hour or a day --
 23 **A. Maybe a couple of days.**
 24 Q. -- or even a couple of days, but six days is an awful
 25 long time when you are trying to remember detail, isn't

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1 officer?
 2 **A. Yes, I think you would find most of the officers would
 3 be with you in that respect. It is a frustrating
 4 period.**
 5 Q. But if most of the officers and I am actually only, with
 6 respect, interested in your view at the moment but if
 7 you were frustrated by that, but you hadn't been told by
 8 anybody not to do it, I am struggling to understand why
 9 you didn't simply write a more detailed account
 10 yourself?
 11 **A. Absolutely. I can only deduce from the kind of events
 12 were that, whether we were going to be -- the argument
 13 with whether we would be interviewed on video or audio
 14 by the IPCC was being resisted, from an organisational
 15 point of view.**
 16 Q. I am going to come on to that.
 17 **A. Yes, so I think it was during that period we didn't want
 18 an account, a full written account and then a further
 19 interview if you like, that may contradict some of these
 20 things because people recall different things in a more
 21 inquisitive interview.**
 22 Q. Right, so the problem was that you were worried that you
 23 might write your first substantial account down and that
 24 might disagree with what someone else might say?
 25 **A. Well, you may contradict yourself, just due to the fact**

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1 **that if you have experienced a death of that nature,
 2 then it is a very stressful account. It doesn't matter
 3 how experienced or capable you are, it is a difficult
 4 period for everybody.**
 5 Q. Yes, I get all of that, but the imperative is to get the
 6 account down, after maybe a short cool-off period, but
 7 to get the account down in as much detail as possible
 8 before that detail becomes contaminated by other
 9 people's views or --
 10 **A. Yes.**
 11 Q. -- is lost through the passage of time. As each hour
 12 goes by or each day goes by the account is going to get
 13 less reliable, isn't it?
 14 **A. Yes, sometimes you remember more, sometimes you remember
 15 less and it is a difficult period to be in. I think,
 16 you know, certainly I can only speak for myself,
 17 I was -- you know, I would have been in a position to
 18 write a statement on perhaps the Monday afterwards, but
 19 there was a clear delay and I think it was -- I can only
 20 think that it would be I was trying to be part of that
 21 process and comply with the process that was being
 22 engaged with at the time. Rather than just kind of
 23 taking independent action and writing a statement of my
 24 own volition, if you like.**
 25 Q. I am not going to pursue that any further with you at

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1 the moment.
 2 You reached 9 March and you were called into
 3 a meeting at Nexus House, which is another police
 4 building in the Ashton area, isn't it?
 5 **A. Yes.**
 6 Q. You have referred, we know about the flip chart and you
 7 have been referred to that and you referred to
 8 a sergeant writing on the flip chart. Would that be X7?
 9 **A. No. Not from memory. It was -- forgive me, I am just
 10 looking at the cypher.**
 11 Q. J4 possibly?
 12 **A. Yes, J4.**
 13 Q. It was J4?
 14 **A. Yes, I recognise the handwriting.**
 15 Q. Right, but X7 was there?
 16 **A. Yes, he will have been.**
 17 Q. And all of the officers involved were there, were they?
 18 **A. Yes.**
 19 Q. Including Q9?
 20 **A. Yes.**
 21 Q. What about Mr Granby, was he involved in that process?
 22 **A. No, I don't recall seeing Mr Granby again for quite some
 23 time after the day.**
 24 Q. You mentioned that you got some of the information from
 25 the flip chart --

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<p>1 A. Yes.</p> <p>2 Q. -- and we have that in writing. Also, there was</p> <p>3 information got from other officers in that process, in</p> <p>4 that meeting, yes?</p> <p>5 A. Well, I would have discussed things with, you know, with</p> <p>6 other officers, I can't specifically say what and who</p> <p>7 with.</p> <p>8 Q. Why not?</p> <p>9 A. Because it is -- I just don't recall at the time and</p> <p>10 I didn't make a note of it.</p> <p>11 Q. Right, it was important to make a note of it though,</p> <p>12 wasn't it? Because when you are making your</p> <p>13 recollection and you are relying on details you have</p> <p>14 checked with another officer in the context of someone</p> <p>15 being shot by a police officer, it is vitally important,</p> <p>16 isn't it, that you record details like who you have</p> <p>17 cooperated with in the writing of that statement?</p> <p>18 A. Absolutely, and I think that is -- I have referenced</p> <p>19 that in my statement and if I were to write the same</p> <p>20 statement again maybe I would add more detail around</p> <p>21 which specific items I have conferred with regarding</p> <p>22 time, date, place, et cetera.</p> <p>23 Maybe on reflection I wouldn't do any of those</p> <p>24 things, I would sit in a separate room and write my own</p> <p>25 statement.</p> <p style="text-align: center;">Page 189</p>	<p>1 Q. Yes, thank you.</p> <p>2 I am very sorry, there is one point I have just been</p> <p>3 reminded that I ought to put. I am sorry, Mr Davies.</p> <p>4 It is simply timing, you started I think it says in</p> <p>5 your statement at about 1.15 in this meeting at</p> <p>6 Nexus House on the afternoon of 9 March.</p> <p>7 A. Yes.</p> <p>8 Q. Can you help us with how long it took, this process of</p> <p>9 you producing this statement with these other officers?</p> <p>10 A. It was a significant period of time. The only thing</p> <p>11 I remember clearly about it is a bank of known</p> <p>12 information would be written about and then it would</p> <p>13 pause and then a bank of known information was written</p> <p>14 about and then when it came to our actions deploying</p> <p>15 from the vehicle, everybody was separated, so --</p> <p>16 Q. Yes, so three hours?</p> <p>17 A. A long time, it seemed.</p> <p>18 MR WEATHERBY: Thank you.</p> <p>19 Questions from MR DAVIES</p> <p>20 MR DAVIES: Yes, I am asking questions on behalf of Q9.</p> <p>21 Were you aware he had in fact provided a first</p> <p>22 account on the night of the event in any event?</p> <p>23 A. I would have expected him to do, but I don't remember</p> <p>24 him handing it over if that makes sense.</p> <p>25 Q. No.</p> <p style="text-align: center;">Page 191</p>
<p>1 Q. Yes, but it was other people who had arranged this</p> <p>2 meeting and you went along with it. Is that the way it</p> <p>3 was?</p> <p>4 A. Yes.</p> <p>5 Q. Can I put to you, we have obviously other witness</p> <p>6 statements, and I just want to suggest to you that other</p> <p>7 officers that were involved with you in making the</p> <p>8 statement were X7, W9, G11 and Q9. Does that jog your</p> <p>9 memory at all? Is that right or is that wrong?</p> <p>10 A. I couldn't say for certain if those particular officers</p> <p>11 were involved. Obviously X7 is the, was the OFC for the</p> <p>12 operation. So he would have had a significant part in</p> <p>13 that process, but there were a number of sergeants on</p> <p>14 the deployment, so that, you know, a number of roles may</p> <p>15 have been taken in --</p> <p>16 Q. I might be right, but you cannot remember?</p> <p>17 A. That's correct.</p> <p>18 Q. Q9?</p> <p>19 A. What? Sorry you are going to have to -- is that</p> <p>20 a question?</p> <p>21 Q. Was Q9 involved with you in the making of your</p> <p>22 statement?</p> <p>23 A. Q9 was in the room and that is all I could say. I know</p> <p>24 he was then separated from the room regarding obviously</p> <p>25 the subsequent actions, et cetera.</p> <p style="text-align: center;">Page 190</p>	<p>1 Just some points on the detail of your recollection,</p> <p>2 please, by reference to your first witness statement.</p> <p>3 To start with, do you have that with you, I imagine it</p> <p>4 is in tab 1.</p> <p>5 A. My full witness statement that was done on the 9th.</p> <p>6 Q. Yes, the one on the 9th.</p> <p>7 Can you turn to page 3 --</p> <p>8 A. Yes.</p> <p>9 Q. -- first paragraph --</p> <p>10 A. Yes.</p> <p>11 Q. -- towards the middle of that first paragraph:</p> <p>12 "The officers in my vehicle got out and ran towards</p> <p>13 the car. I then applied the handbrake of the vehicle</p> <p>14 and got out. As I opened my door I heard a loud crack,</p> <p>15 which through experience sounded like a conventional</p> <p>16 firearms report."</p> <p>17 Are you differentiating in this statement</p> <p>18 a conventional firearm report from the sound of the</p> <p>19 shotguns that came later?</p> <p>20 A. Very definitely.</p> <p>21 Q. There is no ambiguity about it, you are talking here</p> <p>22 about the sound of a MP5 carbine are you, a conventional</p> <p>23 firearm?</p> <p>24 A. It was a conventional report. I could not be certain</p> <p>25 whether it was a MP5 or some other weapon.</p> <p style="text-align: center;">Page 192</p>

<p>1 Q. Right, or a Glock but it was not a shotgun?</p> <p>2 A. It wasn't a shotgun.</p> <p>3 Q. Right.</p> <p>4 In terms of the detail of your recollection, you</p> <p>5 have said you heard that conventional firearm report</p> <p>6 after officers from your vehicle had begun running</p> <p>7 towards the car?</p> <p>8 A. Yes, they were all getting out of the car and ...</p> <p>9 Q. But in a dynamic situation, by the time you have got out</p> <p>10 of the vehicle, the next thing you see is a point in the</p> <p>11 sequence whereby two subjects from that vehicle are</p> <p>12 already out of the vehicle?</p> <p>13 A. By the time --</p> <p>14 Q. That's right, isn't it?</p> <p>15 A. By the time we got to the vehicle, the two subjects,</p> <p>16 I now know the nearside front passenger and the rear</p> <p>17 passenger, were on the floor.</p> <p>18 Q. You didn't see them get out?</p> <p>19 A. No.</p> <p>20 Q. You didn't see the CSDC deployed?</p> <p>21 A. No.</p> <p>22 Q. Notwithstanding, that you were positioned on the near or</p> <p>23 driver's side -- sorry, off or driver's side of your</p> <p>24 vehicle --</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 193</p>	<p>1 A. Yes, from my statement. It is not as clear in my mind</p> <p>2 now but it is from my statement.</p> <p>3 Q. You relate that detail of that in your statement but</p> <p>4 this is the sequence and it is after all of that that</p> <p>5 you hear the extra shotgun rounds?</p> <p>6 A. Yes.</p> <p>7 Q. In terms of hearing the language of, "He has been shot",</p> <p>8 your page 4 of 5, this is quite late in the process,</p> <p>9 isn't it, when Mr Grainger has started to be removed</p> <p>10 from the vehicle?</p> <p>11 A. Yes, it was at a point I had moved back round to the</p> <p>12 nearside of the car and then it was quite a confusing</p> <p>13 scenario at the door of the driver side.</p> <p>14 Q. Yes, we understand that --</p> <p>15 A. I think once I had established that --</p> <p>16 Q. There is pulling and attempting to get him out and he</p> <p>17 eventually comes out of the passenger side --</p> <p>18 A. Yes.</p> <p>19 Q. -- but it is in that process that there is somebody</p> <p>20 shouting he has been shot, not earlier?</p> <p>21 A. I initially thought -- well, I didn't know what had</p> <p>22 happened. His hand had dropped down and I believed him</p> <p>23 to be a threat at that stage, which is what I have</p> <p>24 written in my statement.</p> <p>25 I think it is around that time that somebody --</p> <p style="text-align: center;">Page 195</p>
<p>1 Q. -- with a direct line of sight to the subject vehicle,</p> <p>2 it was right next to you --</p> <p>3 A. Yes.</p> <p>4 Q. -- but you didn't see either people get out of the car</p> <p>5 or the CSDC deployed?</p> <p>6 A. No.</p> <p>7 Q. When you were pulling up and putting your handbrake on,</p> <p>8 and as officers from your car are approaching, you heard</p> <p>9 this conventional firearm report. Was your own window</p> <p>10 up or down?</p> <p>11 A. My door was open when I heard that report.</p> <p>12 Q. Right. You go to the scene and men are out and things</p> <p>13 are being brought under control?</p> <p>14 A. Yes.</p> <p>15 Q. The next thing you effectively describe doing is moving</p> <p>16 round to the rear offside of the subject vehicle, and it</p> <p>17 is roughly at that point that you hear the two</p> <p>18 distinctive shotgun rounds?</p> <p>19 A. As I have moved round the car, at some point during that</p> <p>20 process when I made my way round to the back offside</p> <p>21 door or the rear offside door, I have heard the shotgun</p> <p>22 being discharged.</p> <p>23 Q. Yes. You had observed by then, penultimate paragraph on</p> <p>24 page 3, you had observed CS irritant within the cabin of</p> <p>25 the subject vehicle?</p> <p style="text-align: center;">Page 194</p>	<p>1 I have heard somebody shout he has been shot, at which</p> <p>2 point I have now then slung my weapon and moved into</p> <p>3 a care role for Anthony.</p> <p>4 Q. The clothing of the men that were detained, you have</p> <p>5 described Mr Grainger, for his part, having a pair of</p> <p>6 black gloves on?</p> <p>7 A. Yes.</p> <p>8 Q. In relation to others, it is your statement of 18 May,</p> <p>9 page 2, Mr Totton, you noticed as he was being escorted:</p> <p>10 "... that he was of heavy build, with short hair</p> <p>11 wearing dark clothing, black knitted hat and black</p> <p>12 gloves with reinforced knuckle protection. Similar to</p> <p>13 police or military tactical gloves. The other male who</p> <p>14 I know to be Joseph Travers was nearby, I didn't notice</p> <p>15 what he was wearing."</p> <p>16 A. Yes.</p> <p>17 Q. Based on your experience, is the type of clothing that</p> <p>18 Mr Totton was wearing consistent or inconsistent with</p> <p>19 an intention to commit armed robbery?</p> <p>20 A. It is what we refer to as "robbers' wear".</p> <p>21 Q. Gloves, balaclavas, anonymous looking grey tracksuits?</p> <p>22 A. Yes, generally covering other clothing.</p> <p>23 Q. It is standard kit for armed robbery, isn't it?</p> <p>24 A. Yes.</p> <p>25 MR DAVIES: Thank you.</p> <p style="text-align: center;">Page 196</p>

<p>1 Questions from MS WHYTE 2 MS WHYTE: Three areas. 3 U2, you cannot see me, you know my name is 4 Anne Whyte and I am asking questions on behalf of 5 Greater Manchester Police. 6 Is it in your experience common for the placement of 7 the four cars around the subject vehicle to be decided 8 very shortly before a hard stop? 9 A. It is absolutely necessary to be decided before. 10 Q. Related to that, likewise is it very common for the 11 potential role of individual officers to be finalised, 12 if at all, very shortly before the hard stop? 13 A. Yes. There used to be historically a set role for each 14 officer in each vehicle -- 15 Q. Yes. 16 A. -- that was deemed difficult to achieve and created some 17 issues. So subsequently you approach the vehicle assess 18 which is the priority threat and then deal with it and 19 then other officers who are following your movement 20 towards the vehicle will, what we refer to as fill in on 21 the -- like a descending order of threat and priorities, 22 if that makes sense. 23 Q. To a non-firearms practitioner, does that not seem 24 chaotic. Can you help us with that? 25 A. I can't help you, because I am obviously a firearms</p> <p style="text-align: center;">Page 197</p>	<p>1 trying to get up, and obviously our priority is to get 2 them in a position where we can place handcuffs on them. 3 Q. Were the hands on at that stage? 4 A. Were they hands on? 5 Q. Your fellow officers, did they have hands on? 6 A. Very much so. It was -- I wouldn't refer to it as 7 a fight but there was certainly a struggle. 8 Q. Right, and this was after, on your evidence, a shot had 9 been fired? 10 A. Yes. 11 Q. Do you know which of the two suspects you kicked? Do 12 you know whether it was Mr Totton or Mr Travers? 13 A. I don't know for sure, I think it was Mr Totton. 14 I don't know for sure though. 15 Q. Were you wearing a respirator? 16 A. Yes. 17 MS WHYTE: Thank you. 18 Thank you, sir. 19 Further questions from MR BEER 20 MR BEER: On that last point, when did you put the 21 respirator on, please? 22 A. Prior to getting out of the vehicle. 23 Q. I'm sorry? 24 A. Prior to getting out of my car. 25 Q. When prior to getting out of vehicle did you put it on?</p> <p style="text-align: center;">Page 199</p>
<p>1 officer with a reasonable amount of experience. 2 It is a process of identifying a priority and moving 3 towards it and the officer who is supporting you, as we 4 work in teams, identifying that you have moved to 5 a priority and then is either supporting you with that 6 priority or moving on to the next priority. 7 What it allows for is a very fluid approach to 8 threat. 9 THE CHAIRMAN: It is flexible. 10 A. Flexible. 11 THE CHAIRMAN: Yes. 12 MS WHYTE: And therefore dynamic? 13 A. Yes, indeed. 14 Q. Two very short issues. 15 On page 3 of your main statement, in tab 1 of your 16 bundle, you say that as you approached the nearside of 17 the Audi, with your MP5 on aim at the cabin, you 18 observed other members of your team to your right-hand 19 side struggling with two subjects who appeared to be 20 resisting arrest. 21 Can you tell us what it was about the suspects' 22 physical conduct or otherwise that suggested to you the 23 sense that they were resisting arrest? 24 A. The one nearest to me -- that I clearly remember kicking 25 his leg away from under him -- was trying to stand up or</p> <p style="text-align: center;">Page 198</p>	<p>1 A. I can't say specifically. My usual practice is to wear 2 it on top of my head, which is difficult to describe 3 now, wear it on top of my head and as we are driving, 4 literally at the last moment, to pull the respirator 5 down before people get out of the car, because obviously 6 it is a -- quite a fiddly thing to do. It is rehearsed, 7 in terms of putting it on and it is effective, but 8 I have to remain covert for as long as possible. In 9 case the vehicle moves off. 10 Q. The two straps I think are fixed round the back of the 11 lower part of your head -- 12 A. Yes. 13 Q. -- with the body of the respirator on effectively your 14 forehead and the crown of your head? 15 A. Yes. 16 Q. Then you pull it down? 17 A. Yes. 18 MR BEER: Thank you. 19 Sir, they are the only questions I ask. 20 Questions from THE CHAIRMAN 21 THE CHAIRMAN: I won't keep you very long. 22 On the 9th, when you had the flip chart and the 23 officers were all together, you described that as 24 an unusual situation. 25 You said, not very long ago, that if you were to</p> <p style="text-align: center;">Page 200</p>

1 find yourself in the same situation again you might
 2 perhaps sit in a separate room and write your own
 3 statement.
 4 Did you, at the time, feel at all uncomfortable with
 5 the arrangements, particularly the use of the flip
 6 chart? Did you feel that you were perhaps being asked
 7 to be specific about details to an extent that you
 8 couldn't honestly recall independently?
 9 **A. The overriding feeling from, on reflection, it was**
 10 **unnecessary. And that -- I can't really be any more**
 11 **specific than that, it just felt unnecessary.**
 12 THE CHAIRMAN: I mean if you had put, for example, "1908" in
 13 your statement, instead of what I think you put which
 14 was something like, "At about 7.10", were you concerned
 15 that somewhere down the line, somebody might actually
 16 say to you: how do you know it was 19.08? And you would
 17 have to say, "I took it off a flip chart", was that
 18 going through your mind at the time or anything like
 19 that, to cause you to be a little less precise when you
 20 actually came to writing your statement?
 21 **A. I think, as has been alluded to earlier, you know,**
 22 **unless I looked at my watch and it said 19.08 on my**
 23 **watch, I don't know for certain.**
 24 THE CHAIRMAN: You couldn't actually say it?
 25 **A. That's correct, so I think from my point of view -- you**

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1 **know, it probably wasn't necessary but it felt as though**
 2 **that was the process that we were going through and it**
 3 **... but the overriding feeling, it felt appropriate and**
 4 **above board, it just didn't feel necessary, as**
 5 **a professional police officer I write my own statement,**
 6 **I didn't need that.**
 7 THE CHAIRMAN: Right. I don't know whether anyone wants to
 8 ask anything arising out of that.
 9 Thank you very much.
 10 There is just one other thing, you were asked
 11 questions about the importance, or otherwise, of being
 12 told if one of the subjects about whom you had been
 13 briefed was discovered not to be in the vehicle that was
 14 the subject of the strike. That was, of course, in
 15 relation to Mr Rimmer.
 16 Suppose that you had a situation in which you were
 17 expecting one particularly dangerous individual in
 18 company with two men who were individually not regarded
 19 as particularly dangerous but would be in conjunction
 20 with the main man, if I can put it that way. If the
 21 particularly dangerous man wasn't in the car, would that
 22 not be something that would be quite important to be
 23 told about, because you would then be left with
 24 a vehicle with two occupants who individually -- in
 25 other words not taken in conjunction with the main

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1 man -- might be regarded as much less of a threat?
 2 **A. I would certainly want to know that --**
 3 THE CHAIRMAN: Yes.
 4 **A. -- I think in those circumstances, practically speaking,**
 5 **we probably wouldn't intercept a vehicle of that nature.**
 6 THE CHAIRMAN: I see.
 7 I'm not suggesting that was the situation here, just
 8 exploring the extent to which you would regard it as
 9 relevant to know and to be told if something unexpected
 10 happened in terms of somebody not being in a vehicle.
 11 **A. Yes, I would certainly like to know.**
 12 **It doesn't change that if permission had been given**
 13 **to arrest, State Amber had been given, I feel it**
 14 **appropriate to carry out a proportionate response to**
 15 **that direction.**
 16 THE CHAIRMAN: Right.
 17 Anything out of that? No.
 18 Thank you very much.
 19 Thank you for helping us, U2, your evidence is now
 20 at an end, you are free to go. I am sorry it has taken
 21 a little longer than hoped.
 22 **A. No problem, thanks.**
 23 MR BEER: Sir, we move to G6 tomorrow.
 24 THE CHAIRMAN: 10.30.
 25 MR BEER: Thank you, sir.

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1 THE CHAIRMAN: Thank you.
 2 (4.54 pm)
 3 (The Inquiry adjourned until 10.30 am the following day)
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