

<p>1 Friday, 31 March 2017</p> <p>2 (10.30 am)</p> <p>3 MR BEER: G6, please. Thank you.</p> <p>4 THE CHAIRMAN: G6.</p> <p>5 G6 (sworn)</p> <p>6 THE CHAIRMAN: Thank you, G6.</p> <p>7 I am afraid I must ask you to stand. The reason for</p> <p>8 that is simply that if you sit down you may find it more</p> <p>9 difficult to marshal the various files you are likely to</p> <p>10 be referred to and also we have to be sure that</p> <p>11 everybody who is entitled to can see you and everybody</p> <p>12 hear you. If you feel you need a break at any stage</p> <p>13 because you are uncomfortable, you only have to say.</p> <p>14 A. Okay.</p> <p>15 Questions from MR BEER</p> <p>16 MR BEER: G6, my name is Jason Beer and I ask questions on</p> <p>17 behalf of the Inquiry. To your left-hand side, maybe</p> <p>18 underneath the file, there should be a cypher sheet.</p> <p>19 A. Yes.</p> <p>20 Q. That's right. It has the names of some of your</p> <p>21 colleagues on it. For those that benefit from</p> <p>22 anonymity, such as yourself, it has their cypher. If</p> <p>23 you wish to refer to any of them, please use the cypher</p> <p>24 rather than their real names.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 1</p>	<p>1 A. 1997.</p> <p>2 Q. What was your rank and role in March 2012?</p> <p>3 A. I was a PC on the operations team in the firearms</p> <p>4 department.</p> <p>5 Q. When had you first become an AFO?</p> <p>6 A. Back end autumn 2004.</p> <p>7 Q. Were you a standard AFO or had you also done the CTSFO</p> <p>8 course?</p> <p>9 A. At which point?</p> <p>10 Q. By March 2012.</p> <p>11 A. I was a CTSFO by March 2012.</p> <p>12 Q. When had you qualified as a CTSFO?</p> <p>13 A. I think we qualified the summer before, 2011.</p> <p>14 Q. Was that in readiness for the Olympics?</p> <p>15 A. Yes.</p> <p>16 Q. Had you undergone initial training in MASTS?</p> <p>17 A. Yes.</p> <p>18 Q. When was that?</p> <p>19 A. That will have been 2007.</p> <p>20 Q. Between 2007 and March 2012 had you undergone periodic</p> <p>21 refresher training in MASTS?</p> <p>22 A. Yes.</p> <p>23 Q. What is your understanding, please, of MASTS?</p> <p>24 A. Mobile armed support to surveillance.</p> <p>25 Q. Yes.</p> <p style="text-align: center;">Page 3</p>
<p>1 Q. Thank you very much.</p> <p>2 There is also a bundle in front of you which I would</p> <p>3 ask you to open at tab 1, please. I want to ask you</p> <p>4 about four witness statements in particular.</p> <p>5 At tab 1, is the witness statement in your name</p> <p>6 dated 9 March 2012?</p> <p>7 A. Yes.</p> <p>8 Q. If you move to tab 2, please, is there a witness</p> <p>9 statement dated 21 May 2012?</p> <p>10 A. Yes.</p> <p>11 Q. If you go to tab 3, is there a witness statement dated</p> <p>12 27 September 2012?</p> <p>13 A. Yes.</p> <p>14 Q. Then, lastly, at tab 6, a witness statement dated</p> <p>15 31 July 2014.</p> <p>16 A. 31 July?</p> <p>17 Q. Yes.</p> <p>18 A. Yes.</p> <p>19 Q. Thank you.</p> <p>20 Are the contents of those four witness statements</p> <p>21 true to the best of your knowledge and belief?</p> <p>22 A. Yes.</p> <p>23 Q. Thank you.</p> <p>24 Can we start with some background about you in the</p> <p>25 police service, please, when did you join?</p> <p style="text-align: center;">Page 2</p>	<p>1 A. Inasmuch as there are numerous covert police armed</p> <p>2 assets shadowing a surveillance team and if required to</p> <p>3 either perform an arrest of the subjects, or to perform</p> <p>4 some sort of protection for the actual surveillance</p> <p>5 operators themselves.</p> <p>6 Q. Thank you.</p> <p>7 Were you trained in the use of any special</p> <p>8 munitions, and if so which?</p> <p>9 A. Yes, the CSDC --</p> <p>10 Q. Yes.</p> <p>11 A. -- the Hatton rounds and also the RIP rounds from the</p> <p>12 shotgun.</p> <p>13 Q. By March 2012, can you give us a picture of the nature</p> <p>14 and frequency of the MASTS deployments that you had been</p> <p>15 on?</p> <p>16 A. Over the time while I was trained as a MASTS operator?</p> <p>17 Q. Yes.</p> <p>18 A. I personally have been deployed over 100 times, I would</p> <p>19 guess. I would hesitate an actual number. The number</p> <p>20 of times we actually performed an intervention, maybe</p> <p>21 tens of times. Not every time we were deployed did we</p> <p>22 actually perform some sort of arrest.</p> <p>23 Q. And experience in that I think probably five-year period</p> <p>24 of the use of special munitions?</p> <p>25 A. Occasionally, yes.</p> <p style="text-align: center;">Page 4</p>

<p>1 Q. Had you experienced the use of special munitions, CSDC 2 and Hatton rounds, on a vehicle? 3 A. Yes. 4 Q. With what level of frequency/regularity? 5 A. They were quite often deployed but not often were they 6 actually used. So occasionally we would deploy with 7 CSDC and not actually deploy at the actual strike. 8 Q. When you say they were quite often deployed, you mean 9 that they were authorised for use -- 10 A. Yes, my apologies. 11 Q. -- but then in the event not actually used? 12 A. Yes. 13 Q. Were they a normal or regular bolt-on effectively to 14 a MASTS authorisation? 15 A. Yes, but not always the case. 16 Q. No. 17 What document or documents governed your operation 18 as an AFO? 19 A. At the time it was a manual of guidance, it was also 20 various SOPs that GMP have written, which mirror the 21 manual of guidance quite -- pretty much almost to the 22 word. Those would be reviewed on a regular basis and 23 that will include MASTS, everything from MASTS to 24 special munitions. 25 Q. The manual of guidance is a very long document and it</p> <p style="text-align: center;">Page 5</p>	<p>1 Q. Was your knowledge about David Totton derived 2 principally from him being involved in the Brass Handles 3 shooting? 4 A. Yes. 5 Q. So that was, by March 2012, relatively historic? 6 A. Yes. 7 Q. Anything in particular that you learned about him in 8 between then and Operation Shire -- 9 A. No. 10 Q. -- that you can now remember? Okay. 11 When was your first involvement in Operation Shire? 12 A. I would have to refer to notes to give you the exact 13 date. I know it was in 2011, back end of. 14 Q. When you say you would have to refer to notes, which 15 notes would you personally refer to? 16 A. I think I did write a statement about the dates that 17 I actually deployed on. 18 Q. Yes, if you open the bundle up and look at tab 2, and if 19 you look at the second page of tab 2 -- 20 A. Yes. 21 Q. -- the second paragraph from the bottom. Is that what 22 you are referring to? 23 A. Yes. 24 Q. "During December, January, February and March 2012, 25 I had been deployed a total of 10 times."</p> <p style="text-align: center;">Page 7</p>
<p>1 changes periodically. 2 A. Yes. 3 Q. Is that the kind of document that you would keep 4 yourself as a reference document, whether electronically 5 or in hard copy, or would you rely on your training and 6 the refresher training to tell you about it and changes 7 to it? 8 A. In general it was during the training that we would be 9 given any updates or refreshers from the manual of 10 guidance updates. However, if anything significant came 11 up, occasionally we would get an email or we would 12 have -- I suppose you would call it training, but 13 an update as to the manual of guidance itself. 14 Q. Thank you. 15 Before Operation Shire started in say October 2011, 16 had you any experience of or knowledge of 17 Anthony Grainger? 18 A. No. 19 Q. The same question in relation to Robert Rimmer. 20 A. No. 21 Q. And the same question in relation to David Totton. 22 A. I was aware David Totton was a member of an OCG in the 23 Salford area. In particular I had some dealings with 24 the Brass Handles shooting, I know he was involved 25 within and around that.</p> <p style="text-align: center;">Page 6</p>	<p>1 That is on Operation Shire? 2 A. Yes. 3 Q. When you wrote that, do you know from where you obtained 4 that information? 5 A. As far as my recollection is, somebody had been through 6 all of the briefing packages, had nominated who had been 7 on what deployment, so it was on a list for us to refer 8 to and for us to have a quick check and write it down in 9 the statements. 10 Q. Do you know who had gone through the briefings? 11 A. Unfortunately I can't remember. 12 Q. The only reason for asking is that we don't now have 13 some of those briefings. 14 A. Oh right. 15 Q. Okay. 16 You had been deployed I think before 3 March 2012, 17 which is the operation with which we are concerned -- 18 A. Yes. 19 Q. -- nine times? 20 A. Yes. 21 Q. Before 2 March, the night before, eight times. Is that 22 right? 23 A. Yes. 24 Q. Was that usual, to be deployed on an operation such as 25 this several times, or more than several, on the same</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

1 operation?
 2 **A. Yes.**
 3 Q. To what extent, when you were deployed on each occasion,
 4 did you take into account intelligence that you had been
 5 provided on a previous occasion?
 6 **A. I think over numerous years of going out on operations**
 7 **such as this, long-running operations, quite often the**
 8 **intelligence picture changes drastically over the weeks**
 9 **and months, sometimes even over the days. I am not**
 10 **saying that you would not remember the type of operation**
 11 **or the type of people that we were dealing with**
 12 **throughout.**
 13 **However the numbers of people and also the actual**
 14 **occupants of say the vehicle would change and so,**
 15 **although you are not – you get an overall view of the**
 16 **operation, you take on face value what the briefing is**
 17 **on that actual day.**
 18 Q. Are you saying then really that the primary source of
 19 the information that you use when you get to deploying
 20 on the ground is what you have been told for that
 21 deployment?
 22 **A. The primary information for that day, for that**
 23 **deployment, comes from that briefing.**
 24 Q. Yes.
 25 In briefings generally, I am not speaking about

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1 Operation Shire here, was it usual for the TFC or the
 2 OFC to set out an intelligence case about the subjects?
 3 **A. Yes.**
 4 Q. When they set out that intelligence case, was it usual
 5 for them to give you the grading of the intelligence
 6 that they were providing you?
 7 **A. No.**
 8 Q. Did that ever occur?
 9 **A. To my knowledge, I never got the actual gradings of the**
 10 **intelligence.**
 11 Q. Did they ever indicate by the use of words, rather than
 12 the 5x5 model, the level of confidence or belief in the
 13 intelligence that they were providing?
 14 **A. The intelligence picture that we were provided with,**
 15 **although not graded, was obviously given in a way that**
 16 **we understood how important or not, or how much**
 17 **inference you could draw from various parts of that**
 18 **intelligence itself.**
 19 Q. Can you give some examples of that explanation that you
 20 have just given?
 21 **A. If you think of a gun exchange for example, there is**
 22 **more than likely going to be a weapon there. So**
 23 **therefore that TFC may state that as almost – not**
 24 **necessarily as an absolute fact because we don't know**
 25 **the actual facts before we get to a place, "However the**

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1 **intelligence picture states quite strongly that there**
 2 **will be firearms there".**
 3 Q. Would they use that kind of expression "Intelligence
 4 picture indicates strongly ..."
 5 **A. Yes.**
 6 Q. Or, "Intelligence suggests that ..."
 7 **A. Yes.**
 8 Q. Or, "We have reliable intelligence that ..."
 9 **A. Yes.**
 10 Q. Or, "A tried and tested source ..."
 11 **A. Very rarely would they talk about sources.**
 12 Q. Okay.
 13 Were your ears attuned to listening out for those
 14 differences of expression?
 15 **A. Yes, but up to a point.**
 16 Q. What was the point and why was there that point?
 17 **A. I think the point of the intelligence picture is**
 18 **deciding on how dangerous somebody is. The fact that**
 19 **the picture has already gone through various levels of**
 20 **scrutiny, I guess, and by the time it gets to ourselves**
 21 **as the team, the full picture has to be watered down for**
 22 **various reasons. The facts that are given to us on the**
 23 **day are taken at face value as to how that picture is**
 24 **painted in front of ourselves.**
 25 Q. So to take an example, not this one, if the information

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1 that was being conveyed was that the subjects are going
 2 to have weapons, and that the weapons are firearms, you
 3 wouldn't necessarily distinguish between a TFC that said
 4 to you, "Intelligence indicates that the subjects will
 5 have firearms", "We believe that the subjects have
 6 firearms", "We strongly believe that the subjects have
 7 firearms" or, "There is reliable intelligence that the
 8 subjects have firearms"?
 9 **A. I think ultimately, we are being told that the subjects**
 10 **may or may not have firearms, the actual strength of the**
 11 **intelligence needs to be tested at a different level by**
 12 **the TFC and SFC. By the time it has filtered through**
 13 **both of those and come back to ourselves, we take it as**
 14 **being robustly tested already. So the phrasing is not**
 15 **irrelevant, however --**
 16 Q. Not that important?
 17 **A. No, not as important.**
 18 Q. In each of the four examples I have given you there, the
 19 message that you would walk away from that briefing with
 20 would be, "I should work on the basis that the subjects
 21 may have firearms"?
 22 **A. May have access to firearms.**
 23 Q. Yes.
 24 In fact, my example was not access to, it was that
 25 they had them.

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1 By March 2012 were you aware that Operation Shire
 2 had been split into two operations or two strands?
 3 **A. No.**
 4 Q. By March 2012 -- you attended I think briefings on 2 and
 5 3 March, we are going to see in a moment. Did you
 6 notice, did it occur to you, that previously you had
 7 been briefed a number of times about the Corkovics and
 8 the dangers that they were said to create and that on
 9 this occasion, you weren't?
 10 **A. It wasn't apparent over the time, as I previously have**
 11 **stated. It was quite often for subjects to drop in and**
 12 **out of operations, sometimes on a daily basis.**
 13 Q. That didn't particularly strike you that the Corkovics
 14 had been involved quite a lot up until now, and on these
 15 occasions they are not?
 16 **A. No.**
 17 Q. Can we turn then to 2 and 3 March and your attendance at
 18 a briefing on 2 March to start with.
 19 You should have relatively close to hand a bundle
 20 called "General bundle: firearms officers 2".
 21 If you can turn up, please, tab 20, that should be
 22 the PowerPoint presentation for Friday, 2 March.
 23 **A. Yes.**
 24 Q. Were these a recurrent feature of firearms deployments
 25 at this time, a PowerPoint presentation given in

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1 a briefing room by the TFC and the OFC?
 2 **A. Yes.**
 3 Q. I think we can see from the second page of that, 448,
 4 that you, G6, were due to be present.
 5 **A. Yes.**
 6 Q. If we go over the tab to tab 21, there is a transcript
 7 of the recording of that briefing, and I think
 8 two-thirds of the way down the page we can see that you
 9 were actually present, because you called your name out.
 10 **A. Yes.**
 11 Q. If we go back to tab 20, and look at page 449, ignore
 12 the handwriting on it at the moment, just look at the
 13 typed script. This was read out in the course of the
 14 briefing to you. The first line of it was:
 15 "The subjects of this operation are believed to be
 16 engaged in armed robberies in the north-west region."
 17 We can see that there isn't an assessment or grading
 18 put against that, I think for the reasons that you have
 19 explained.
 20 What would you have taken away from that paragraph?
 21 **A. That would be probably the reason why we were being**
 22 **deployed in the first place, to stop the robbery from**
 23 **happening.**
 24 Q. It is said that the subjects are believed to be engaged
 25 in armed robberies. What would you understand an armed

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1 robbery to be?
 2 **A. Either with some sort of weapon or firearms.**
 3 Q. Okay.
 4 So a weapon that may be a firearm or may not?
 5 **A. It could be any type of weapon, axes, hammers, bats,**
 6 **sledgehammers or a firearm.**
 7 Q. You wouldn't necessarily take from that that it was
 8 assessed to be a robbery or robberies involving
 9 firearms?
 10 **A. No, not necessarily.**
 11 Q. Just look over the page, please, at 450, when we get to
 12 the threat assessments for each of the three subjects,
 13 their intent is expressed in the same way, "Conspiracy
 14 to commit armed robbery". Same applies there, does it?
 15 **A. Yes.**
 16 Q. Yes?
 17 **A. Yes.**
 18 Q. Thank you.
 19 The next paragraph on page 449, if you just read it
 20 to yourself for the moment, the one beginning, "There is
 21 intelligence to suggest that ..."
 22 (Pause)
 23 The paragraph reads that these subjects were
 24 responsible for a robbery in 2008. Did you or would you
 25 have understood that to mean the three subjects that you

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1 were then briefed about?
 2 **A. Yes.**
 3 Q. Would you have understood this to have referred to the
 4 fact that these men had been convicted of this offence?
 5 **A. No, that would say that these subjects had been**
 6 **convicted of it. It is just saying that there is**
 7 **intelligence to suggest that they have.**
 8 Q. If subjects had been convicted of the thing that you
 9 were being told about, you would expect that to be
 10 explicitly referred to?
 11 **A. Yes.**
 12 Q. We can see an example of that on page 451, in the threat
 13 assessment for Mr Rimmer. Can you see "Warnings"?
 14 **A. Yes.**
 15 Q. It says:
 16 "Subject has served five and a half years for
 17 a section 18 assault."
 18 **A. Yes.**
 19 Q. I think that is the only example in this briefing of
 20 a reference to a conviction. If you just look at 450,
 21 451 and 452.
 22 **A. Yes. Conviction you say?**
 23 Q. Conviction.
 24 **A. Yes.**
 25 Q. You would have taken the balance of the information that

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1 you were given as being intelligence only?
 2 **A. Yes.**
 3 Q. What would you have taken therefore from the second
 4 paragraph on page 449? What impact would it have had on
 5 you?
 6 **A. That the subjects themselves, firstly, had access to**
 7 **a shotgun and a handgun, certainly in the past, and have**
 8 **a propensity of violence whilst doing robberies.**
 9 Q. That would be important and significant information?
 10 **A. Yes.**
 11 Q. Because you were being told they had acted together, the
 12 same three men, doing the very same crime that they were
 13 now suspected of committing?
 14 **A. Yes.**
 15 Q. And two of the three of them had had guns?
 16 **A. Yes.**
 17 Q. Would that have sent your risk matrix higher than had
 18 you not been told about it?
 19 **A. Potentially, prior to any actual involvement with the**
 20 **actual subjects themselves.**
 21 Q. Yes. I don't think the third and the fourth paragraphs
 22 we need look at.
 23 If we go over the page to page 450, please. You can
 24 see that Mr Totton has, it was said, three warnings
 25 against his name.

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1 In relation to each of the three of those, you would
 2 have taken from that, is this right, that this was
 3 intelligence only, might relate to arrests or
 4 intelligence falling short of arrests, but not
 5 convictions?
 6 **A. Yes. Yes.**
 7 Q. Mr Rimmer we have looked at, at page 451.
 8 Mr Grainger at page 452, the first two things
 9 I think you have answered that you would regard as
 10 intelligence only.
 11 What did you understand a Group 1 offender to be?
 12 **A. That is a higher offender for GMP, one of the more**
 13 **prolific and more dangerous offenders that need to be**
 14 **dealt with expeditely whenever possible.**
 15 Q. What do you mean by that?
 16 **A. Sorry, explain --**
 17 Q. Yes, "Prolific offender" in relation to which if any
 18 crimes?
 19 **A. The higher end crimes, burglaries, robberies, any**
 20 **offences against the person, as far as I am aware.**
 21 Q. So more serious offences, in particular involving
 22 acquisitive theft and violence?
 23 **A. Yes.**
 24 Q. You said also "dangerous"?
 25 **A. Yes.**

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1 Q. You thought Group 1 offender related in particular to
 2 dangerous offenders?
 3 **A. Inasmuch as robberies and offences against a person,**
 4 **intrusive burglaries et cetera, would be classed per se**
 5 **as dangerous.**
 6 Q. Yes.
 7 All of this -- I am not exploring with you the
 8 extent to which a lot of the information that we have
 9 read so far is completely wrong, I am just looking at it
 10 on its face and what you would take from it. What
 11 impact would you be telling that Mr Grainger was
 12 a Group 1 offender have?
 13 **A. That he is part of an OCG and that, along with the other**
 14 **two, that they are going to work together and**
 15 **potentially commit very serious crime on that evening.**
 16 Q. Thank you.
 17 If we go to the briefing at tab 21, please. Tab 21.
 18 **A. I've got a record of interview?**
 19 Q. Yes, it is a transcript of the briefing itself --
 20 **A. Okay.**
 21 Q. -- done on an MG15. We can see that you called your
 22 name out as part of the roll call at the beginning and
 23 then I think on page 176, the next page, is Mr Lawler
 24 speaking. I wanted to ask you, at the foot of 1176,
 25 about a paragraph beginning "Er ..." Can you see that?

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1 **A. Yes.**
 2 Q. "... before we go into the threat assessment we all need
 3 to be aware there is no current information or
 4 intelligence to say the subjects have either possession
 5 or immediate access to firearms or other less lethal
 6 weapons. However my assumption is that they are about
 7 to commit armed robbery, based on their previous
 8 criminal behaviour. They will either have firearms or
 9 less lethal weapons. So you are all trained in judgment
 10 to again deal with threat that we may face at the time
 11 we go to intercept them."
 12 Can you see that?
 13 **A. Yes.**
 14 Q. You probably don't now have a recollection of what you
 15 understood Mr Lawler to mean there?
 16 **A. No.**
 17 Q. Reading it now, what do you understand him to mean?
 18 **A. It means that there is no, as is said there, no definite**
 19 **information/intelligence, nothing absolute, which is**
 20 **difficult to give, that these offenders have with them**
 21 **a firearm. However they are part of a group and**
 22 **potential intelligence to state that they have access to**
 23 **the firearms and it would make sense that if they are**
 24 **going to go and do an armed -- going to do a robbery,**
 25 **that they will have some sort of weapon with them,**

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<p>1 firearms or otherwise.</p> <p>2 Q. I see. You said that there is no definite intelligence,</p> <p>3 which it is hard to have. What he says is that there is</p> <p>4 no current information or intelligence. Do you</p> <p>5 understand that to mean that we have not got anything</p> <p>6 now that says they are likely to have a weapon of any</p> <p>7 sort with them, but, based on their previous offending</p> <p>8 and their previous criminal behaviour, because they are</p> <p>9 going to commit an armed robbery they will have weapons</p> <p>10 with them?</p> <p>11 A. Yes.</p> <p>12 Q. Yes?</p> <p>13 Would that be important information, the assessment</p> <p>14 of the likelihood of the offenders having weapons with</p> <p>15 them?</p> <p>16 A. Yes.</p> <p>17 Q. When we come to the briefing the next day, 3 March, the</p> <p>18 relevant briefing, neither Mr Granby nor X7 gave</p> <p>19 an equivalent statement such as that. The briefing was</p> <p>20 silent as to the likelihood of the subjects having</p> <p>21 weapons with them. I suspect now you don't remember</p> <p>22 noticing that?</p> <p>23 A. No.</p> <p>24 Q. Moving on in Mr Lawler's briefing, please, if we can go</p> <p>25 to 1179, there are two passages, one on this and one on</p> <p style="text-align: center;">Page 21</p>	<p>1 that is going to be the place of the robbery.</p> <p>2 Q. It is of course for him to decide the tactical plan and</p> <p>3 within that to identify tipping points and then</p> <p>4 ultimately to decide whether a tipping point has been</p> <p>5 met --</p> <p>6 A. Yes.</p> <p>7 Q. -- but here he was, on the face of it, announcing his</p> <p>8 plan, or that part of it, that related to transit to</p> <p>9 Culcheth, to each of you?</p> <p>10 A. Yes.</p> <p>11 Q. Yes?</p> <p>12 He was giving you early sight of what the plan was,</p> <p>13 yes?</p> <p>14 A. Yes.</p> <p>15 Q. Again, there was no equivalent plan announced to you the</p> <p>16 following day. We can go through each page of the</p> <p>17 transcript but it is not there.</p> <p>18 On 3 March, was that something that you noticed?</p> <p>19 A. No.</p> <p>20 Q. That the plan had, not changed but was not apparently</p> <p>21 the same as the previous day?</p> <p>22 A. No. Different TFCs have different styles of giving out</p> <p>23 tipping points and giving out their plan.</p> <p>24 Q. Did you know at the point of the briefing what the plan</p> <p>25 was?</p> <p style="text-align: center;">Page 23</p>
<p>1 the next page, that I would ask you to look at. Do you</p> <p>2 see the main box?</p> <p>3 A. Yes.</p> <p>4 Q. And the second larger paragraph within the main box?</p> <p>5 A. Yes.</p> <p>6 Q. About six or seven lines in it is said:</p> <p>7 "The reason we are at Leigh police station is</p> <p>8 obviously to intercept the subjects prior to them</p> <p>9 getting to Culcheth."</p> <p>10 Can you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Then over the page, please, at 1180, it is said:</p> <p>13 "While we are on the subject [this is the second</p> <p>14 paragraph] our intention is to conduct an interception</p> <p>15 prior to any offence taking place, which is before we</p> <p>16 get to Culcheth."</p> <p>17 A. Yes.</p> <p>18 Q. Can you recall now that the tactical plan appeared to be</p> <p>19 that the intention of your group was to prevent the</p> <p>20 subjects if they entered the Audi from ever reaching</p> <p>21 Culcheth?</p> <p>22 A. That is a role for the TFC, to decide whereupon the</p> <p>23 tipping points are. That to me is giving me</p> <p>24 an indication of the tipping points, that ideally we</p> <p>25 don't want the subjects to be anywhere near Culcheth, if</p> <p style="text-align: center;">Page 22</p>	<p>1 A. Sorry, on which day?</p> <p>2 Q. The 3rd.</p> <p>3 A. On the 3rd, yes.</p> <p>4 Q. What was the plan?</p> <p>5 A. The plan was for us to sit at Leigh police station, wait</p> <p>6 for the tipping points to be met in one way or another,</p> <p>7 wait for the TFC to make a decision about to move us to</p> <p>8 State Amber and then move up to perform some sort of</p> <p>9 arrest.</p> <p>10 Q. It was much more, on the face of it, flexible than the</p> <p>11 previous day?</p> <p>12 A. I think the previous day the TFC stated some tipping</p> <p>13 points and made some decisions there. However, I would</p> <p>14 like to say that that would change during -- as the</p> <p>15 intelligence picture changes throughout the operation.</p> <p>16 Nothing that is said here, at the briefing, the tipping</p> <p>17 points, certainly, would not necessarily ever be set in</p> <p>18 stone at that moment in time.</p> <p>19 Q. No. It doesn't bind him or anyone but what it does do</p> <p>20 to you -- and us now reading it five years on -- is show</p> <p>21 that his plan was, if he could, to stop the subjects</p> <p>22 from ever getting to Culcheth?</p> <p>23 A. Yes.</p> <p>24 Q. Can you recall whether the following day, by contrast,</p> <p>25 the plan was to allow the subjects to get to Culcheth?</p> <p style="text-align: center;">Page 24</p>

<p>1 A. I don't think that was ever in the plan. However, it 2 wasn't mentioned. 3 Q. You attended the briefing the following day at about 4 6.00 in the morning? 5 A. Yes. 6 Q. If we go over, please, to tab 22, I think we can again 7 see on the second page that you are listed as being 8 intended to be present? 9 A. Yes. 10 Q. If we go to tab 23, we can see at the top of the second 11 page that you again call your name out? 12 A. Yes. 13 Q. To what extent can you recall now whether this was 14 effectively a continuation of the previous day's 15 deployment or appeared to be a different or fresh 16 approach? 17 A. The operations running over two consecutive days is more 18 likely than not going to be a very similar operation. 19 The briefing, however, is the briefing and things do 20 change within, sometimes within minutes if not hours 21 between briefings. 22 Q. I think you had been asked to attend Openshaw for 4.30 23 in the morning; is that right? 24 A. Yes. 25 Q. Without prying too much into your personal</p> <p style="text-align: center;">Page 25</p>	<p>1 contemporaneously, what does that mean? 2 A. We would be interviewed and every word, as is today, 3 written down and written in a script. 4 Q. With a shorthand note? 5 A. Yes. 6 Q. Yes. 7 Who was that discussion between? 8 A. As far as I was aware, the IPCC and the PIM manager. 9 Q. Was that on the night of Saturday, 3 March into the 10 morning of Sunday, 4 March, or was it in the week that 11 followed? 12 A. I can only assume it was the week after. 13 Q. Who was communicating with you about this? 14 A. Chief inspector Hughes spoke to us a couple of times 15 about what we were going to be doing during the week. 16 Q. That continued into the following week, did it? It was 17 not restricted to the PIP or minimum process on the 18 night? 19 A. No, I assumed it was the PIM process that would continue 20 throughout the week. 21 Q. Were you keen to make a written account of what had 22 happened? 23 A. I was -- to be honest, I was quite happy to go home 24 after the actual initial day. 25 Q. Yes.</p> <p style="text-align: center;">Page 27</p>
<p>1 circumstances, what time would that mean that you would 2 have to get up to get there? 3 A. About an hour before. 4 Q. So up at 3.30 in the morning? 5 A. Yes. 6 Q. You I think subsequently made a witness statement about 7 the circumstances of then what happened on 3 March; is 8 that right? 9 A. Yes. 10 Q. If we turn to that, please, tab 1 in your bundle. We 11 can put the other one away for the moment, thank you. 12 Tab 1 in your own bundle, we can see that it is 13 dated 9 March 2012, yes? 14 A. Yes. 15 Q. You made I think your first written account of the 16 events of Saturday, 3 March some six days later, the 17 following Friday? 18 A. Yes. 19 Q. What was the reason for that delay? 20 A. To my knowledge and my recollection, I think there was 21 some discussion about whether we were going to be video 22 interviewed or whether we were going to be interviewed 23 contemporaneously or whether we were just going to give 24 statements. 25 Q. When you said we were going to be interviewed</p> <p style="text-align: center;">Page 26</p>	<p>1 A. But a couple of days later, yes, I wanted to just get my 2 statement written. 3 Q. Was that your natural instinct as a policeman, that if 4 you had seen or done something relevant, you wanted to 5 make a first account of it as soon as practicable? 6 A. As soon as practicable, I think in this case and I think 7 it is generally accepted, that a small rest period, so 8 that you can actually think about what has actually 9 happened, prior to writing is probably the best course 10 of action. 11 Q. Yes, I think the manual of guidance recommends up to 12 48 hours. 13 A. Yes. 14 Q. Were you a party to the communications with the IPCC or 15 was it done through a more senior officer? 16 A. I wasn't party about it. 17 Q. Your communication was directly with Chief Inspector 18 Hughes? 19 A. Yes. 20 Q. Were you content to give a video-recorded interview? 21 A. I think that as a professional police officer, I was 22 more than happy to do it via a normal, everyday 23 statement. I think that sometimes an interview, you 24 don't have an opportunity to think and actually get 25 things down in the correct order.</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

1 Q. Do I take from that answer that you weren't happy to be
 2 video interviewed, audio interviewed or a shorthand note
 3 being taken of your account?
 4 **A. Out of choice, I would have done what I have done**
 5 **already, written a statement. But probably earlier.**
 6 Q. Can you help us as to how it was that it was 9 March
 7 that was the day on which you provided your account?
 8 **A. That was the day I was told to come in and take my**
 9 **statement.**
 10 Q. Who told you to come in?
 11 **A. Chief Inspector Hughes.**
 12 Q. Did you know when you went to Nexus House, at lunchtime
 13 on the 9th, that the other members of the team were
 14 going to do the same?
 15 **A. Yes.**
 16 Q. Do you know who made that decision, that it was going to
 17 be a collective statement writing process?
 18 **A. No, I was just told that was the way we were going to do**
 19 **it.**
 20 Q. Were you all in the same room, therefore, at lunchtime
 21 on 9 March?
 22 **A. As far as I remember, yes.**
 23 Q. Can you explain to us the process by which you wrote
 24 your statement?
 25 **A. I think there was some discussion about some of the**

1 **basic facts that were already written in other places,**
 2 **such as TFC logs et cetera, the registration number**
 3 **I think of the vehicle -- that initially was wrong --**
 4 **was written up. There wasn't much else as far as**
 5 **I remember written up on a piece of --**
 6 Q. On a flip chart?
 7 **A. Yes.**
 8 Q. Were they pre-written when you went in or was there
 9 a discussion before they were written?
 10 **A. No, there was some sort of discussion.**
 11 Q. Then somebody wrote them up?
 12 **A. Yes.**
 13 Q. Can you remember who wrote them up?
 14 **A. I think it was J4.**
 15 Q. Did you use the times that J4 wrote on the flip chart to
 16 compile your statement?
 17 **A. I think I did, yes.**
 18 Q. Did you use other information that J4 wrote up on the
 19 board?
 20 **A. I think the registration number of the red Audi.**
 21 Q. If we just look, please, we have a copy of the flip
 22 chart. There should be three pieces of paper there and
 23 if you have it open alongside your witness statement,
 24 can you see at the top of the first page it says, "TOD
 25 [tour of duty] 04.30".

1 **A. Yes.**
 2 Q. I think that is the time in your witness statement at
 3 tab 1?
 4 **A. Yes.**
 5 Q. Do you think you probably used that?
 6 **A. Yes.**
 7 Q. Then in your third paragraph, you say:
 8 "At approximately 0600 hours that day I attended
 9 an operational briefing and the briefing [at the end of
 10 that paragraph] concluded at 06.15."
 11 Do you see on the right-hand side of the flip chart
 12 it says "Approximately 0600 to 0615"?
 13 **A. Yes.**
 14 Q. Do you think you probably used that?
 15 **A. Probably.**
 16 Q. Then over the page in your witness statement, it says:
 17 "At 1815 hours I was updated with the fact that the
 18 red Audi was on the move and generally towards Culcheth.
 19 We then moved as a team from Leigh police station."
 20 Do you see on the flip chart it says, "18.15, leave
 21 Leigh police station"?
 22 **A. Yes.**
 23 Q. Yes?
 24 Then your witness statement continues:
 25 "We moved to a closer lay up point at the Raven Inn,

1 Warrington Lane junction with Hey Shoot Lane."
 2 Do you see on the flip chart it says, "Raven Inn,
 3 Warrington Road junction with Hey Shot Lane".
 4 I think you have corrected the "shot" to the
 5 "shoot", correctly so?
 6 **A. Yes.**
 7 Q. Do you think you used this both as to the timing and as
 8 to what you did as the basis of your statement?
 9 **A. Whether I used this or I may have even researched it,**
 10 **I knew that it was the Raven Inn so I will have looked**
 11 **up potentially exactly where that was, I wouldn't have**
 12 **noted it at the time.**
 13 Q. What, looked it up on a phone or something?
 14 **A. Yes.**
 15 Q. In your witness statement in the next paragraph, you
 16 say:
 17 "At 1908 hours that day, the bravo vehicle was still
 18 parked when I was informed that we had been given State
 19 Amber."
 20 Can you see the chart says, "19.08 State Amber"?
 21 **A. Yes.**
 22 Q. You think you probably would have used the time?
 23 **A. Yes.**
 24 Q. Your next paragraph:
 25 "At 19.12 hours that day I heard X7 call State Red."

1 The flip chart says "State Red", yes?
 2 **A. Yes.**
 3 Q. Over the page, on the flip chart, "Red Audi, LO08 LOD"?
 4 **A. Yes.**
 5 Q. Can you see that you have used that on page 1 of your
 6 witness statement, I think in the third paragraph?
 7 **A. Yes.**
 8 Q. I think you now know that that is wrong?
 9 **A. Yes.**
 10 Q. But you were taking it in good faith from what had been
 11 written up?
 12 **A. Yes.**
 13 Q. I think the ages of two of the subjects, Mr Totton and
 14 Mr Grainger, at 32 and 35 are given on the flip chart.
 15 Do you think you took those in your third paragraph too?
 16 **A. Yes.**
 17 Q. Were you comfortable about the process that was being
 18 undertaken? Firstly that you were writing witness
 19 statements collectively, ie within the same room at the
 20 same time as other officers?
 21 **A. It seemed slightly strange. I wasn't uncomfortable in**
 22 **the fact that most of the facts here I probably would**
 23 **have checked prior to writing my own statement. And the**
 24 **room was pretty quiet, nobody was actually talking.**
 25 Q. You said that you would have checked the facts before

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1 writing them into your witness statement. Where would
 2 you check the facts?
 3 **A. Some of those facts, such as ages, et cetera, I would**
 4 **have gone back and researched and made sure that I got**
 5 **the right date of births or the right age group. Those**
 6 **types of things are readily available.**
 7 Q. Where would you look, taking the ages?
 8 **A. I would have looked on the computer systems.**
 9 Q. Why would you do that?
 10 **A. I mean or I could have looked at the briefing, either.**
 11 Q. Why would you do that, when you were writing a witness
 12 statement of what your recollection was?
 13 **A. My recollection wouldn't have been exact for the dates**
 14 **of birth, I wouldn't have written that down at any time.**
 15 Q. I don't think you write the dates of birth down at the
 16 beginning of the witness statement in any event.
 17 **A. I put their ages down and if I didn't know their ages at**
 18 **the time I would have checked the ages back on the**
 19 **briefing package.**
 20 Q. Just help, why would you do that when you are writing
 21 a witness statement which is your recollection of what
 22 you were told?
 23 **A. Because that is my recollection of what I was told in**
 24 **the briefing.**
 25 Q. But if it was your recollection, you would be able to

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1 write it without researching it?
 2 **A. It is narrowing down the actual -- who the actual people**
 3 **are.**
 4 Q. That isn't an answer, G6.
 5 Was it your understanding that this was supposed to
 6 be an account of what you remembered?
 7 **A. Yes.**
 8 Q. Rather than an account of what you remembered, improved
 9 by conducting some research?
 10 **A. The statement itself, there are certain parts of it that**
 11 **are given facts. Their ages for example are given**
 12 **facts.**
 13 Q. But hold on, who is to say that what you were told in
 14 the briefing was incorrect?
 15 **A. Potentially. But then that is the information that**
 16 **I had.**
 17 Q. But if you went away and researched the true position,
 18 you would write down the true position, not what you
 19 were told.
 20 **A. That is what I have done here.**
 21 Q. Say for example, the registration number, you took that
 22 as a given fact?
 23 **A. Yes.**
 24 Q. In fact that fact was incorrect, wasn't it?
 25 **A. Yes.**

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1 Q. I am just trying to understand the extent to which you
 2 used after-acquired knowledge in order to write this
 3 witness statement up.
 4 **A. Only on the basic facts that are not -- that are**
 5 **straightforward, such as date of births and ideally we**
 6 **would have checked the registration number.**
 7 Q. Did you use any after-acquired knowledge, for example by
 8 discussion with other officers, as to the sequence of
 9 events and what happened in order to complete the
 10 witness statement?
 11 **A. On the 9th?**
 12 Q. Yes.
 13 **A. No.**
 14 Q. Why not?
 15 **A. Because there was no discussion about it.**
 16 Q. But why didn't you?
 17 **A. It is probably not appropriate to fully go through every**
 18 **single motion and decide on everybody's threat**
 19 **assessment, everybody's hierarchy of what is actually**
 20 **happening at the time.**
 21 **The picture is supposed to be mine, so it is written**
 22 **as mine.**
 23 Q. So it would be inappropriate to speak with other
 24 colleagues about what had happened, that has to come
 25 from you and you alone?

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1 **A. Other than the given facts that are already ever known.**
 2 Q. Can we turn then to the events of the evening.
 3 I think it came that at -- if you look at the top of
 4 page 2 of your witness statement, you were at Leigh
 5 police station at 6.15. Is that right?
 6 **A. Yes.**
 7 Q. You had been there for about 12 or so hours, maybe just
 8 under 12 hours?
 9 **A. Yes.**
 10 Q. Yes?
 11 What had you done in that 12 hours?
 12 **A. Rested, watched some TV, read a book. I think I got**
 13 **some sleep in a car at some point.**
 14 Q. Did you, before going to Leigh police station with the
 15 other officers, conduct any rehearsals or drills as to
 16 the stop or stops that you may be required to perform
 17 that day?
 18 **A. No.**
 19 Q. And same question at Leigh police station, did you?
 20 **A. No.**
 21 Q. Did you receive any intelligence updates in the course
 22 of the day before 6.15?
 23 **A. As far as I recollect there were various updates to the**
 24 **movement of the car, but nothing more than that.**
 25 Q. If you look at page 1 of your witness statement, at the

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1 foot of the page, you say in the last line:
 2 "During this period I was given occasional
 3 intelligence updates."
 4 **A. Yes.**
 5 Q. Can you remember anything else, other than it was about
 6 movement of the subjects and movement of the cars?
 7 **A. No, some of those intelligence updates could be that**
 8 **there is no update, that is quite often an update for**
 9 **ourselves.**
 10 Q. Did you receive any updates in the course of the day
 11 that indicated that there was intelligence that the
 12 subjects were armed or might be armed?
 13 **A. No.**
 14 Q. Any further intelligence updates in the course of the
 15 day that related to the subjects' intention to carry out
 16 a robbery?
 17 **A. No.**
 18 Q. Were you told at about 5.30 pm, or that from 5.30 pm
 19 onwards, that the command team knew that Robert Rimmer,
 20 one of the three about whom you had been briefed, would
 21 not be in the Audi?
 22 **A. No.**
 23 Q. Would you regard that as information that you would wish
 24 to know, that one of the three subjects about whom you
 25 had been briefed was not to be in the vehicle?

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1 **A. I think it would be more important to know the numbers**
 2 **of people in the vehicle, whether or not it was the**
 3 **subjects or not and if it was a different subject, who**
 4 **that other subject was.**
 5 Q. Is the answer yes, it would be something that you would
 6 wish to know that one of the subjects was not in the
 7 vehicle?
 8 **A. It would be useful, yes.**
 9 Q. And the fact that a third, unknown, male was instead in
 10 the vehicle?
 11 **A. Yes, it would be useful.**
 12 Q. Why would it be useful?
 13 **A. When you are conducting a vehicle strike, you need to**
 14 **know really ideally how many people are in the vehicle,**
 15 **what seats they are sitting in and what their overall**
 16 **intention is. If that third person that is sitting in**
 17 **the vehicle is highly unconnected, is somebody's friend**
 18 **or family member, a child for example, that would make**
 19 **the picture very different.**
 20 Q. Were you party to any discussion with Q9 in the course
 21 of the lay up at Leigh police station about the
 22 subjects' previous alleged involvement in offences?
 23 **A. No.**
 24 Q. Did you overhear any such discussion between Q9 and X7?
 25 **A. No.**

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1 Q. Did you hear a conversation in which X7 sought to put Q9
 2 right about what he was saying about such previous
 3 involvement?
 4 **A. No.**
 5 Q. You spent about 12 hours or so there and by the time
 6 that you came to deploy on State Red at about 7.12 that
 7 night, you had been up for a very, very long time?
 8 **A. Yes.**
 9 Q. To what extent was that usual in a deployment such as
 10 this?
 11 **A. Relatively usual. The rest periods are factored in,**
 12 **I think the TFC keeps an eye on the rest periods and we**
 13 **rest when we are supposed to rest because we know it**
 14 **could be a long day.**
 15 Q. To what extent, if any, did you having to get up at 3.30
 16 in the morning, and then effectively do nothing for
 17 a 12-hour period, impact on your operational
 18 effectiveness when you came to deploy at 7.00ish?
 19 **A. It wouldn't change anything.**
 20 Q. If we look at page 2 of your witness statement, please,
 21 you say:
 22 "At 18.15 hours that day I was updated with the fact
 23 that the red Audi was on the move and generally towards
 24 Culcheth."
 25 Yes?

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1 **A. Yes.**
 2 Q. Then:
 3 "We then moved as a team."
 4 At 6.15 you were told that the red Audi was on the
 5 move and heading towards Culcheth?
 6 **A. Yes.**
 7 Q. I wonder whether we could just look at some other
 8 papers, please.
 9 Can we start, please, with R/118.
 10 I think the bundle is on its way.
 11 **A. Thank you.**
 12 Q. Thank you. 118, please. They are in the bottom
 13 right-hand corner.
 14 This is an observation log, which includes entries
 15 from DC Clark, who was part of the Operation Shire
 16 robbery team, conducting observations from
 17 an observation point in the area of the Boothtown where
 18 the stolen Audi had been parked up.
 19 Do you see it says:
 20 "18.29, black Golf from Sandringham/Leigh Road
 21 direction pulls up just to the side of subject vehicle 1
 22 [that is the red Audi]. Subject Gloucester into front
 23 driver's seat [that is Mr Grainger], subject Wilt [that
 24 is Mr Totton] into front passenger. Unknown male into
 25 rear driver's seat. All three wearing sports clothing.

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1 Gloucester wearing gloves."
 2 That is Mr Grainger.
 3 Do you see he has Mr Totton and Mr Grainger getting
 4 into the car back in Boothtown at 6.29. You said that
 5 at 6.15 you were told that the red Audi was on the move
 6 and heading towards Culcheth?
 7 **A. That is my recollection of why we were moving.**
 8 Q. Well, I am just going to test the times that you were
 9 given, you see, that you treated as fact.
 10 If we can put that away, remembering that, so that
 11 is Clark, observation point, two subjects only into
 12 vehicle at 6.29.
 13 Next, if we can look, please at K/117.
 14 Are you there, G6?
 15 **A. Yes.**
 16 Q. Thank you. This is the wrong page --
 17 THE CHAIRMAN: It is the wrong date, isn't it?
 18 It is 123, isn't it?
 19 MR BEER: Thank you very much.
 20 Can you see this is a document we have looked at
 21 before. It is an amalgamation of entries from
 22 surveillance logs by either DSU or Robbery Unit officers
 23 put into a convenient time-ordered chronology and typed
 24 up.
 25 **A. Yes.**

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1 Q. Can we see at item 155 -- 154 was the entry we just
 2 looked at, yes?
 3 **A. Yes.**
 4 Q. 155:
 5 "At 6.29 DC Evans saw the red Audi as it travelled
 6 along Sandringham Road towards its further exit at
 7 Leigh Road and then left towards the A580 East Lancs
 8 road, 'As the vehicle passed me I saw the driver to be
 9 Anthony Grainger and the front seat passenger to be
 10 David John Totton.'
 11 Yes?
 12 **A. Yes.**
 13 Q. Then a minute later DC Rushbrook sees the vehicle
 14 travelling along Chaddock Lane, Boothtown towards the
 15 East Lancs road, yes?
 16 **A. Yes.**
 17 Q. The next one concerns what happened to the black Golf,
 18 yes?
 19 **A. Yes.**
 20 Q. Then at 6.40 DC Wallace saw the red Audi travelling
 21 along Church Lane in Culcheth, yes?
 22 **A. Yes.**
 23 Q. What is written there, I am not going to spend time
 24 going to it now, is supported by the download from
 25 a vehicle tracking device on the red Audi. We can put

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1 bundle K away.
 2 Namely that at 6.28, the vehicle was still on
 3 Sandringham Road in Boothtown.
 4 For your note, sir, that is K/1057.
 5 THE CHAIRMAN: Thank you.
 6 MR BEER: But at 6.29 it had moved from Leigh Road to
 7 Chaddock Lane, again K/1057.
 8 It seems from those three sources of evidence, the
 9 observations of DC Clark, the observations of the DSU
 10 and the vehicle tracking device, that the first vehicle
 11 movement of the red Audi was at 6.29. Can you help us
 12 then as to how it was that you were updated with the
 13 fact that the red Audi was on the move and heading
 14 towards Culcheth at 6.15?
 15 **A. That was my recollection at the time, a week later, as**
 16 **to why we moved from Leigh police station to the**
 17 **Raven Inn.**
 18 Q. Can you help us to try and break that down. You
 19 remember moving from Leigh police station to the
 20 Raven Inn?
 21 **A. Yes.**
 22 Q. Was that because of an update that the red Audi was
 23 travelling to Culcheth?
 24 **A. That is my recollection, yes.**
 25 Q. The time that you have put in, was that taken from the

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1 flip chart?

2 **A. Yes.**

3 Q. Or was it that you moved from Leigh police station to

4 the Raven Inn at 6.15, but that was before the red Audi

5 was heading towards Culcheth?

6 **A. That is a possibility.**

7 Q. Can you help us as to which is more likely, that it was

8 only because of the Audi moving towards Culcheth that

9 you moved from Leigh police station to the Raven Inn,

10 and you have taken the time from the flip chart and that

11 is wrong or you moved at 6.15 from Leigh police station

12 to the Raven Inn and that was unrelated to the Audi

13 heading towards Culcheth?

14 **A. I wouldn't be able to say which is the most likely. You**

15 **may have to speak to the TFC who moved us.**

16 Q. In any event, at this time, you were in a Ford S-Max,

17 the bravo vehicle, is that right?

18 **A. Yes.**

19 Q. You, I think, were the front nearside passenger?

20 **A. Yes.**

21 Q. U2 was next to you driving?

22 **A. Yes.**

23 Q. X9 was sitting behind you, the rear nearside passenger?

24 **A. Yes.**

25 Q. And U9 was sitting behind you but diagonally across from

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1 the rear offside passenger seat?

2 **A. Yes.**

3 Q. Is it right that at the Raven Inn you were made aware

4 that the Audi had entered Culcheth?

5 **A. Yes.**

6 Q. And after a short period of time had parked in a car

7 park off Jackson Avenue --

8 **A. Yes.**

9 Q. -- which itself is off Common Lane?

10 **A. Yes.**

11 Q. Can you remember what time that was?

12 **A. No.**

13 Q. If you just look at the top of page 2 of your witness

14 statement there, you describe going to the Raven Inn and

15 it being a further lay up point, and you say that you

16 were made aware that the red Audi had three occupants,

17 it had entered Culcheth, parked in Jackson Avenue, yes?

18 **A. Yes.**

19 Q. Can you remember at what stage that was whilst you were

20 at the lay up point at Raven Inn?

21 **A. No.**

22 Q. We have been told, through a variety of sources of

23 evidence, that the first time that the Audi was observed

24 in the car park was at about 6.45 pm. Does that sound

25 about right?

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1 **A. There was some time at the Raven Inn.**

2 Q. Were you told that the Audi had been observed conducting

3 what were assessed to be anti-surveillance manoeuvres?

4 **A. On that evening?**

5 Q. By this time.

6 **A. No.**

7 Q. You go on to say in this paragraph here, G6:

8 "The vehicle, I was informed, had stopped in the top

9 right-hand corner from the entrance off Jackson Avenue

10 and was facing out of the bay."

11 **A. Yes.**

12 Q. Yes?

13 At this time, whilst you were still at the second

14 lay up point at Raven Avenue, you were told the location

15 of the Audi precisely?

16 **A. Yes.**

17 Q. And you were told the orientation of it within its

18 parking space, namely that it was facing outwards?

19 **A. Yes.**

20 Q. On the timings that you have provided here of moving to

21 State Red at about 7.12, and the timings that we have of

22 the vehicle first being observed in the car park at

23 6.45, nearly 30 minutes passes between -- to be precise,

24 27 minutes passes between the time at which it was

25 observed, it was first observed, and the time at which

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1 Red is declared, yes?

2 **A. Yes.**

3 Q. In that 30 minutes or so, was there a discussion between

4 your car and the alpha vehicle, X7 in particular, about

5 the tactics that were to be used if the vehicle remained

6 in this position?

7 **A. No.**

8 Q. Is it fair to say that a number of options were

9 available if a strike was to be called on the vehicle in

10 the position that you had been told that it was in?

11 **A. Not really many options. But, yes, you could have some**

12 **variations.**

13 Q. I am thinking in particular of: a side-on strike, so

14 that your vehicle effectively T-boned the Audi or the

15 alpha vehicle T-boned the Audi; a nose-to-nose strike

16 where it went through the exit, the alpha vehicle, and

17 came head to head with the Audi; or the alpha vehicle

18 went itself side on to the nose of the Audi, so it was

19 T-boned by the red Audi.

20 Are they the main three options?

21 **A. Just say the first one again, because I don't think that**

22 **would have been an actual viable option, putting the**

23 **bravo car to block the vehicle.**

24 Q. The alpha vehicle driving to the side of the nearside of

25 the --

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<p>1 A. Ah, I see. That is an unlikely event due to the -- 2 unless you are in an absolutely empty car park, you 3 wouldn't be guaranteeing that, you would go for the most 4 obvious, which I think he has ended up doing. 5 Q. We know that it was not an absolutely empty car park and 6 that there was a car in a space but one next to the 7 Audi, to its nearside. 8 You are saying that that would not give a clear line 9 in to be able to T-bone the Audi? 10 A. No, it wouldn't. 11 Q. It is a choice of nose to nose -- 12 A. Yes. 13 Q. -- or T-boning itself, yes? 14 A. Yes. 15 Q. In that time there wasn't a discussion, as far as you 16 can recall, between your car on the main set and X7 or 17 anyone else in the alpha car? 18 A. No. 19 Q. In that time, the 30 minutes or so, was there 20 a discussion between your car and the alpha car, I am 21 thinking again of X7 in particular, about whether the 22 strike was best made in the car park, given the position 23 of the Audi? 24 A. No. 25 Q. In that time, was there a discussion between your car</p> <p style="text-align: center;">Page 49</p>	<p>1 I am so sorry, did you hear the TFC give State 2 Amber? 3 A. I can't remember whether it was the TFC or it was X7. 4 Q. The way you have written it is: 5 "At that time I was informed that we had been given 6 State Amber from the TFC." 7 A. If that is what I have written, then that is what I will 8 have recollected at the time. 9 Q. It was relayed to you rather than hearing it directly? 10 A. Yes. 11 Q. Was any further detail given other than the words, "We 12 are at State Amber"? 13 A. Unless it says here, no. 14 Q. You then proceed into a convoy with alpha first, you, in 15 bravo, second and then the charlie car following you. 16 Is that right? 17 A. Yes. 18 Q. Along Warrington Road towards Culcheth, you turn into 19 Common Lane, passing Sainsbury's, turn into 20 Jackson Avenue, yes? 21 A. Yes. 22 Q. At 7.12 you say that you heard X7 call State Red over 23 the radio. Again, was it limited to that? 24 A. Yes. 25 Q. "State Red"?</p> <p style="text-align: center;">Page 51</p>
<p>1 and the alpha car between the roles that each car was to 2 perform? 3 A. No. 4 Q. Or even which side of the vehicle the occupants of which 5 car would cover? 6 A. No. 7 MR BEER: Sir, I don't know whether that is a convenient 8 moment? 9 THE CHAIRMAN: Yes, we are getting to the appropriate stage. 10 We will take five minutes, please. Thank you. 11 If you would just like to hang on there, Mrs Shaw 12 will come and fetch you. 13 A. Yes. 14 (11.46 am) 15 (A short adjournment) 16 (12.00 pm) 17 THE CHAIRMAN: Yes, Mr Beer. 18 MR BEER: G6, you have written that at 19.08, when you were 19 still in the car park of the Raven Inn, State Amber was 20 given from the TFC, yes? 21 A. Yes. 22 Q. What words were used to convey that? Just "State 23 Amber"? 24 A. "State Amber", yes. 25 Q. Was any further detail given from the TFC?</p> <p style="text-align: center;">Page 50</p>	<p>1 A. Yes. 2 Q. At this point, what were you wearing? 3 A. Jeans, I don't know exactly what clothes, but it was all 4 plainclothes. I can't remember whether I was wearing 5 a jacket or a jumper. 6 Q. Did you have any police identification on you? 7 A. No. 8 Q. I think in tab 6 of this bundle, as a result of 9 a request from the IPCC to set out what identifiable 10 police markings you had at the point of arrest, you say: 11 "I was not wearing and did not have any identifiable 12 markings at that time." 13 Is that right? 14 A. Yes. 15 Q. Did you have a police cap? 16 A. Yes. 17 Q. Why, subsequently, did you not use it? 18 A. I was wearing my respirator. 19 Q. At what point did you put the respirator on? 20 A. As we come into the car park. 21 Q. Just after State Red was called; is that right? 22 A. Yes. 23 Q. You say that in the third paragraph of this statement, 24 in the third line: 25 "At this point I then put on my respirator."</p> <p style="text-align: center;">Page 52</p>

<p>1 Yes?</p> <p>2 A. Yes.</p> <p>3 Q. At this point, I think on the basis that the evidence</p> <p>4 you have given so far as you are driving on to the car</p> <p>5 park, you hadn't received any instructions as to the</p> <p>6 tactical plan, the approach or the role that each of you</p> <p>7 was to perform on the stop. Is that right?</p> <p>8 A. Yes.</p> <p>9 Q. You put the respirator on, is that because you thought</p> <p>10 that there was a good likelihood that CSDC was going to</p> <p>11 be deployed?</p> <p>12 A. CSDC was authorised --</p> <p>13 Q. Yes.</p> <p>14 A. -- and therefore there is a probability that it will be</p> <p>15 deployed.</p> <p>16 Q. As you drove on to the car park, did you see any members</p> <p>17 of the public on the car park?</p> <p>18 A. No.</p> <p>19 Q. Did you hear any officers, either as you drove on to the</p> <p>20 car park or after you got out of the vehicle, give any</p> <p>21 instructions to members of the public?</p> <p>22 A. No.</p> <p>23 Q. What were the lighting conditions like as you drove on</p> <p>24 to the car park?</p> <p>25 A. It was quite dark in the car park itself but there was</p> <p style="text-align: center;">Page 53</p>	<p>1 did there come a time when it sped up?</p> <p>2 A. Only ever so slightly, it just pulled away from the</p> <p>3 bravo car, I think just to make sure that the block is</p> <p>4 on, because at some point as the alpha vehicle will come</p> <p>5 across the front of the Audi itself, that is the point</p> <p>6 of sort of no return, if you like. Where the occupants,</p> <p>7 if they are in the vehicle or around the vehicle, they</p> <p>8 will see the police coming so at that point there is</p> <p>9 a little bit more urgency.</p> <p>10 Q. Did you see it come into contact with the Audi?</p> <p>11 A. No.</p> <p>12 Q. Did your vehicle come into contact with the alpha?</p> <p>13 A. No.</p> <p>14 Q. Did you see the alpha vehicle come to rest across the</p> <p>15 front of the Audi?</p> <p>16 A. Yes.</p> <p>17 Q. Were they touching?</p> <p>18 A. I wouldn't like to say. From the angle that I am at,</p> <p>19 there is no way I can see the other side of that</p> <p>20 vehicle.</p> <p>21 Q. You were in the front passenger seat?</p> <p>22 A. Yes.</p> <p>23 Q. And so you couldn't see the touching point, if there was</p> <p>24 a touching point, of the bonnet to the offside of the</p> <p>25 alpha?</p> <p style="text-align: center;">Page 55</p>
<p>1 artificial light from sodium lights.</p> <p>2 Q. You, I think, say that you could see as the alpha</p> <p>3 vehicle accelerated slightly away from you, the front of</p> <p>4 the Audi momentarily lit up by the lights of its alpha</p> <p>5 vehicle?</p> <p>6 A. Yes.</p> <p>7 Q. As that happened, could you see whether the car was</p> <p>8 occupied or not?</p> <p>9 A. No.</p> <p>10 Q. At what speed did the alpha vehicle cross the car park?</p> <p>11 A. The miles per hour or just a general.</p> <p>12 Q. A general description first.</p> <p>13 A. General manoeuvring around a car park speed, 5/10 miles</p> <p>14 an hour, I wouldn't want to say exactly the speed.</p> <p>15 Something that is not out of the ordinary.</p> <p>16 Q. The same on your vehicle, the bravo vehicle?</p> <p>17 A. Yes.</p> <p>18 Q. Is that deliberate?</p> <p>19 A. Yes.</p> <p>20 Q. And why?</p> <p>21 A. The point of the covert nature of the strike is that the</p> <p>22 vehicles and ourselves can get into a position where</p> <p>23 an element of surprise, giving the offenders very little</p> <p>24 chance to either make off and/or prep themselves.</p> <p>25 Q. You say that the alpha vehicle accelerated slightly, so</p> <p style="text-align: center;">Page 54</p>	<p>1 A. No, it would be across the far side of the alpha</p> <p>2 vehicle.</p> <p>3 Q. You then I think got out of the front passenger vehicle</p> <p>4 of the bravo vehicle when it came to a stop?</p> <p>5 A. Yes.</p> <p>6 Q. How long before the alpha vehicle coming to a stop did</p> <p>7 your vehicle come to a stop?</p> <p>8 A. Moments.</p> <p>9 Q. A second or two?</p> <p>10 A. Perhaps.</p> <p>11 Q. You say that you got out of the front passenger seat and</p> <p>12 began moving towards the Audi, yes?</p> <p>13 A. Yes.</p> <p>14 Q. As you got out, could you see whether there were any</p> <p>15 other officers from the alpha vehicle already out of</p> <p>16 their vehicle?</p> <p>17 A. X7 was moving towards the front of the alpha vehicle and</p> <p>18 W9 had already gone and was going between the alpha and</p> <p>19 the bravo vehicle.</p> <p>20 Q. Describe firstly where you saw X7 come from and go to?</p> <p>21 A. X7 came out of the nearside front seat and went away</p> <p>22 from myself towards the front of the alpha vehicle.</p> <p>23 Q. Did he go round the front of the alpha vehicle?</p> <p>24 A. As far as I am aware, yes.</p> <p>25 Q. So when you were getting out, he was still on the</p> <p style="text-align: center;">Page 56</p>

1 nearside of the alpha vehicle?
 2 **A. He was at the front of the vehicle.**
 3 Q. Do you mean by the bonnet?
 4 **A. By the nearside wing going around -- to go around the**
 5 **front of the alpha vehicle.**
 6 Q. So front nearside quarter?
 7 **A. Yes.**
 8 Q. W9, where was he as you were getting out of the vehicle?
 9 **A. He was going behind the alpha, between the alpha and the**
 10 **bravo down towards the Audi.**
 11 Q. Did you see where he had come from?
 12 **A. I can only assume that he has come out of the back of**
 13 **the vehicle, the rear nearside passenger seat.**
 14 Q. He was coming in between the two cars, alpha and bravo?
 15 **A. Yes.**
 16 Q. At what point in his journey was he then, as you got
 17 out?
 18 **A. He was pretty much in between the two vehicles.**
 19 Q. Were you aware of what the driver of the alpha and the
 20 rear offside passenger were doing?
 21 **A. No.**
 22 Q. You say:
 23 "I saw there was only one officer going round the
 24 front of the alpha vehicle and on to the driver's side
 25 of the Audi and decided to follow."
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1 Is that right?
 2 **A. Yes.**
 3 Q. That one officer is X7; is that right?
 4 **A. Yes.**
 5 Q. If you forgive me one moment.
 6 X7, if he gives evidence in accordance with
 7 a statement that he has provided to the Inquiry, will
 8 say that before the alpha vehicle and bravo vehicle
 9 stopped he communicated by radio to say that the alpha
 10 vehicle would cover the driver's side of the stolen Audi
 11 and that the bravo officers should cover the passenger
 12 side of the stolen Audi. Did you hear that broadcast?
 13 **A. No.**
 14 Q. Because what you then did is you say:
 15 "I saw that there was only one officer going round
 16 the front of the alpha vehicle and then on to the
 17 driver's side of the Audi and decided to follow."
 18 **A. Yes.**
 19 Q. You were going to the driver's side of the Audi?
 20 **A. Yes. Regardless of whether you plan prior to pulling up**
 21 **on to an actual strike itself, the flexibility has to be**
 22 **there. W9 has obviously got his own reasons for not**
 23 **going to the driver's side and going down that side and**
 24 **therefore I filled in that gap.**
 25 Q. This was a decision you made on the spur of the moment,
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1 effectively?
 2 **A. Nearly all these decisions, as you step out of the**
 3 **vehicle you are confronted with various different**
 4 **choices to be made, has to be made on the spur of the**
 5 **moment.**
 6 Q. You say that you rounded the front of the alpha vehicle
 7 and as you did so, you could see X7 in front of you
 8 challenging the male in the driver's seat?
 9 **A. Yes.**
 10 Q. Yes. Was the window of the driver's side of the Audi
 11 open?
 12 **A. I wouldn't like to say.**
 13 Q. What was X7 doing to challenge the male in the driver's
 14 seat?
 15 **A. He was challenging him, shouting "Armed police", "Stand**
 16 **still".**
 17 Q. What position was X7 in, in terms of how he was holding
 18 his weapon?
 19 **A. He was pointing his weapon at the driver.**
 20 Q. Can you describe the way in which he was pointing his
 21 weapon?
 22 **A. He was shoulder mounting his carbine, pointing at him.**
 23 Q. Was there a TAC light or torch illuminated on it?
 24 **A. I cannot remember that, I can't recollect whether there**
 25 **was or not.**
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1 Q. Was there a TAC light or torch illuminated on your
 2 weapon?
 3 **A. No, I wasn't pointing my weapon.**
 4 Q. Could you see any other sighting system that was in
 5 operation?
 6 **A. No.**
 7 Q. If a sighting system was in operation, would you be able
 8 to see it?
 9 **A. If it was a green laser, yes, if it was another sighting**
 10 **system, no.**
 11 Q. If it was the red dot, you wouldn't?
 12 **A. No.**
 13 Q. But if it was the green laser then yes?
 14 **A. Potentially, yes.**
 15 Q. Can you now recall whether you saw any sighting system
 16 in operation?
 17 **A. No.**
 18 Q. Can you help us with what X7 was shouting at the driver?
 19 **A. Not exactly per se, "Armed police" was definitely**
 20 **shouted. I don't know what other words he used.**
 21 Q. Was he telling the driver to do anything?
 22 **A. Not that I recollect.**
 23 Q. What did you do?
 24 **A. I came down the side. I didn't know whether X7 would**
 25 **push on to the rear door. He didn't, he held his ground**
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<p>1 as he was dealing with the front seat passenger. I then 2 pushed past X7 and covered the rear offside door. 3 Q. What was the space like on that offside of the vehicle? 4 A. It was quite tight, but I could easily get past him. 5 Q. You just went past him effectively to the rear offside 6 door? 7 A. Yes, the next threat. 8 Q. What did you do when you got there? 9 A. The window itself was dark tinted or blacked out, 10 I tried the door handle because I wanted to see what was 11 inside, there was nothing -- I couldn't open the door, 12 I shouted "Locked doors" and waited for support. 13 Q. Did support come? 14 A. Yes, I think U2 came round and told me that the back of 15 the vehicle was clear. 16 Q. Before U2 came round it, had anything else significant 17 happened? 18 A. There was the shotgun rounds going off. 19 Q. Was that before U2 came round? 20 A. As far as I remember, yes. 21 Q. If you just look at your statement, please, at the foot 22 of page 2, about four lines from the bottom, you say, 23 five lines up: 24 "As I rounded the front of the alpha vehicle I could 25 see X7 in front of me challenging the male in the</p> <p style="text-align: center;">Page 61</p>	<p>1 Q. You were I think a very well trained firearms officer at 2 this point in time, weren't you? 3 A. Yes. 4 Q. You would recognise the sound of a shot being 5 discharged, wouldn't you? 6 A. Most of the time. But every time we fire shots, we 7 actually fire with ear defenders on, so therefore the 8 sound is muffled quite a lot. 9 Q. Where was the sound of the shot coming from? 10 A. From the other side of the vehicle. 11 Q. If you look at your second statement, please, at tab 2, 12 the fourth paragraph, you say: 13 "I have been requested to clarify details about the 14 shots I heard." 15 Who asked you to clarify the details about the shots 16 that you had heard? 17 A. I think it was the IPCC. 18 Q. You say: 19 "I have further reflected on the sound and direction 20 of these noises and have realised an error in my initial 21 statement." 22 A. Yes. 23 Q. If the IPCC hadn't have approached you, would you have 24 realised the error in your statement? 25 A. Yes.</p> <p style="text-align: center;">Page 63</p>
<p>1 driver's seat [that was Anthony Grainger]. I then went 2 along the driver side of the Audi in order to get to the 3 rear offside door and cover it." 4 That is what you have told us? 5 A. Yes. 6 Q. "As I reached the front offside wheel arch of the Audi, 7 I was right behind X7 and I heard a shot." 8 Yes? 9 A. Yes. There is a further statement to that. 10 Q. Sorry? 11 A. There is a further statement to that first bang. 12 Q. I'm sorry? 13 A. There is a further statement explaining that first bang. 14 Q. Yes. I am going to come to that. 15 You then say: 16 "Then I passed X7 and began to cover the rear 17 offside, I heard a second shot." 18 Is that accurate? 19 A. Inasmuch as the first shot I don't think was actually 20 a gunshot, I think it was the window going in. 21 Q. Why in this statement did you say it was a shot? 22 A. I didn't realise any windows had actually been broken at 23 the time and when I heard the bang, in my head I only 24 put two and two together and made, "It must have been 25 a shot".</p> <p style="text-align: center;">Page 62</p>	<p>1 Q. By May, I don't think you had, had you? 2 A. No, it became apparent and it was only at that very late 3 date that I actually found out that the window had been 4 smashed. 5 Q. Did you not hear in the course of the collective 6 statement writing on 9 March that the window was 7 smashed? 8 A. No. 9 Q. I think you knew on the day that the CSDC had been 10 discharged? 11 A. Yes. 12 Q. How did you think the CSDC had got into the car? 13 A. The window could have already been opened, the door was 14 opened by the time I got round the other side. Various 15 methods of getting the actual CSDC into a vehicle. 16 Q. Continuing with your statement of 21 May, you say: 17 "I have therefore reflected on the sound and 18 direction of these noises and have realised an error in 19 my initial statement, inasmuch as I should have stated 20 there were three bangs. I initially believed these to 21 be three shots, I was aware that there were three shots 22 fired and have made that connection. Through reflection 23 and with further understanding of the incident, I now 24 believe the first bang not to be a shot, as below." 25 Who did you obtain the further understanding from?</p> <p style="text-align: center;">Page 64</p>

<p>1 A. It came out due to the fact that the CSDC was taken 2 offline and that we weren't to smash the windows. 3 Q. Sorry, say again? 4 A. During that period we were to not use the CSDC, not to 5 put the windows in and smash -- and put the CSDC into a 6 vehicle. 7 Q. It was banned from use or suspended from use? 8 A. Yes, and it was at that point when I realised that that 9 is exactly how it had gone into the vehicle. 10 Q. How did you make the connection with the CSDC not being 11 used that the sound of the shot that you had heard was 12 in fact a window being broken? 13 A. I don't know, it was part of that discussion that we 14 weren't to do that. 15 Q. Who was the discussion with? 16 A. I can't remember. 17 Q. You continue: 18 "On my approach to the red Audi, the first bang 19 I heard I initially thought was a shot. On further 20 reflection, this initial pop was not as loud as the 21 second or third and came from the nearside of the 22 vehicle and came in front of me." 23 How is it that on further reflection you are able to 24 remember the different qualities in the sound of the 25 first, second and third noise?</p> <p style="text-align: center;">Page 65</p>	<p>1 that Q9 had shot Mr Grainger with his MP5? 2 A. I knew that a shot had come from an MP5, yes. 3 Q. Did you know it was Q9 that had fired the shot? 4 A. Yes. 5 Q. Did you hear that shot? 6 A. No, I don't think I did. 7 Q. Why don't you think you heard it? 8 A. Because I can't recollect hearing the extra crack of the 9 round. 10 Q. Are you sure that it wasn't this shot that you are 11 referring to here, at the foot of page 2 of your first 12 statement: 13 "As I reached the front offside wheel arch of the 14 Audi I was right behind X7 and I heard a shot." 15 Why wasn't it that shot? 16 A. It wasn't loud enough in retrospect and thinking about 17 the actual noise, I don't think it was actually loud 18 enough to be an actual discharge of a firearm. 19 Q. You continue, back to your first statement, please: 20 "Then I passed X7 and began to cover the rear 21 offside door. I heard a second shot. I then lit up the 22 rear offside door with the torch on my carbine [I think 23 that answers the question earlier, that it was at that 24 point that you lit the rear offside door up]. The 25 window was tinted ..."</p> <p style="text-align: center;">Page 67</p>
<p>1 A. I certainly remember a lower-decibel pop and then two 2 loud bangs, which were the shotgun. 3 Q. Why had you not, if you remembered that at the end 4 of May, said that six days after the incident on 5 9 March? 6 A. I think, as I have stated in this statement here, I was 7 fully aware that three shots had been fired and put the 8 connection together. 9 Q. You continue over the page on your second statement: 10 "I regularly hear shots fired with ear defenders on 11 and this muffles the sound, which is similar to the 12 sound of a car window being broken. This I believe is 13 where my confusion was made and I didn't have ear 14 defenders on at the time. I initially thought that this 15 was the noise of a shot being discharged but I now 16 believe due to the volume and also the direction of the 17 bang that this was the window on the nearside of the 18 vehicle being smashed prior to deployment of the CS 19 canister. 20 "The second and third bangs I heard whilst I was 21 along the offside of the red Audi were louder than the 22 first bang, of equal volume and both came from the 23 opposite side of the vehicle. I believe these both to 24 be shots from a shotgun." 25 By the time you made this statement, did you know</p> <p style="text-align: center;">Page 66</p>	<p>1 Stopping there, had you been briefed before then 2 that the windows of the vehicle were tinted? 3 A. No. 4 Q. You say: 5 "I then saw the CSDC fill the front of the car and 6 I shouted to open the doors. At that time I was aware 7 I was on my own on that door and shouted for support. 8 I then heard a third shot. When no immediate support 9 arrived I tried the door, I was pretty sure there was no 10 person in the seat. Found the door was locked ..." 11 And you shouted "Locked door", is that all accurate? 12 A. Yes. 13 Q. I think U2 then arrived and told you that the rear of 14 the vehicle was clear? 15 A. Yes. 16 Q. You were covering the rear offside seat of the vehicle 17 shouting that the door was locked and in fact you now 18 know that there was nobody in it? 19 A. Yes. 20 Q. What did you do next? 21 A. I slung my weapon and went back to the driver's door to 22 help deal with the driver itself. 23 Q. Before you went back to the driver, can you recall 24 seeing any of the driver's actions? 25 A. No.</p> <p style="text-align: center;">Page 68</p>

<p>1 Q. When you went past X7 on the first occasion and he was 2 issuing commands, or shouting at Mr Grainger, what was 3 Mr Grainger doing?</p> <p>4 A. I didn't pay hardly any attention to him as I was trying 5 to negotiate between X7 and the bushes.</p> <p>6 Q. Wouldn't you wish to see whether he had a weapon or not?</p> <p>7 A. No, because the next threat is that rear door and if 8 somebody is in the back of that car, that needs to be 9 covered. X7 has got the driver under control.</p> <p>10 Q. You didn't see Mr Grainger at all or what he was doing; 11 is that right?</p> <p>12 A. I knew there was a person in the front seat, but 13 I didn't pay much attention to what he was actually 14 doing.</p> <p>15 Q. You then returned your attention back to X7 and 16 Mr Grainger. What happened?</p> <p>17 A. At the time, I think one of the other officers had both 18 his hands out of the door, the window had either been 19 smashed or was already down. X7 was still covering. 20 Again I tried the door to see if we could get the driver 21 out of that door and it was locked. We then tried to 22 manoeuvre Mr Grainger away from the handle on the inside 23 so as we could open the actual door itself and I think 24 there was a shout to pass him through the actual vehicle 25 itself.</p> <p style="text-align: center;">Page 69</p>	<p>1 Q. He was what, slumped towards it?</p> <p>2 A. Yes.</p> <p>3 Q. What did you think he was doing at this point?</p> <p>4 A. He didn't seem to be doing anything, I was just trying 5 to get him out of the vehicle.</p> <p>6 Q. Were his eyes open?</p> <p>7 A. I didn't see his eyes.</p> <p>8 Q. Did he make any movements at all?</p> <p>9 A. No.</p> <p>10 Q. Did you manage to release the door handle?</p> <p>11 A. No, before I even got anywhere near the door handle, 12 like I said, there was a shout of, "Pass him through the 13 vehicle".</p> <p>14 Q. Was that from U2?</p> <p>15 A. It could have been, I don't know.</p> <p>16 Q. Did U2 appear on the passenger side of the vehicle?</p> <p>17 A. From inside the vehicle or from -- I don't know who we 18 actually passed him to.</p> <p>19 Q. If you look at your statement at page 3, paragraph 3, 20 you say: 21 "Before I could get to the handle, I heard another 22 officer shout from inside the cabin 'Pass him through'. 23 I then pushed Grainger towards the passenger side of the 24 vehicle ..."</p> <p>25 A. If that is the recollection, then yes.</p> <p style="text-align: center;">Page 71</p>
<p>1 Q. At any stage before now had you seen whether the 2 vehicle's engine was running?</p> <p>3 A. No.</p> <p>4 Q. Your impression was that it wasn't running?</p> <p>5 A. Yes.</p> <p>6 Q. Were the front lights of the vehicle on?</p> <p>7 A. I wouldn't be able to say.</p> <p>8 Q. Was there any light inside the car generated by the car, 9 ie its courtesy lights or similar?</p> <p>10 A. I can't remember any.</p> <p>11 Q. Had you seen any other signs that the vehicle was 12 running?</p> <p>13 A. No.</p> <p>14 Q. You I think have said that you reached inside the 15 vehicle through either a broken window or an open window 16 and took hold of Mr Grainger's head trying to pull him 17 out of the vehicle?</p> <p>18 A. I was trying to pull him towards and away from the door 19 handle so I could get hold of the door handle.</p> <p>20 Q. When you say "pull him towards you", were you pushing 21 him away?</p> <p>22 A. Pushing him up and away from the seat, towards the 23 actual door itself.</p> <p>24 Q. He wasn't holding on to the door handle?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 70</p>	<p>1 Q. "... and U2, who was waiting to grab him." 2 Is that right?</p> <p>3 A. Yes.</p> <p>4 Q. When you passed Mr Grainger through to U2, did then 5 you -- I think you say that you turned to the rear of 6 the Audi and made your way around to assist with the 7 subjects, yes?</p> <p>8 A. Yes.</p> <p>9 Q. You covered the boot on your way past?</p> <p>10 A. No. I held at the boot.</p> <p>11 Q. Sorry?</p> <p>12 A. I held at the boot. The boot had not been cleared, 13 I was making my way round to assist with the offenders. 14 I got to the boot, the boot had not been cleared so 15 I held on there and called for more support.</p> <p>16 Q. You were waiting to cover the boot, pending it being 17 opened?</p> <p>18 A. It had not been opened, yes.</p> <p>19 Q. Did it there come a time when it was opened?</p> <p>20 A. Yes.</p> <p>21 Q. And it was clear?</p> <p>22 A. Yes.</p> <p>23 Q. Did somebody then shout "trauma"?</p> <p>24 A. I think it was before the boot was opened.</p> <p>25 Q. Just look at your statement there, you say that shortly</p> <p style="text-align: center;">Page 72</p>

<p>1 after "trauma" was shouted, someone shouted, "He has 2 been shot". Was that the first time you knew that 3 somebody had been shot? 4 A. Yes. 5 Q. Did you then seek to provide some trauma care to 6 Mr Grainger? 7 A. After clearing the boot, yes. 8 Q. What position was he in when you first found him, 9 Mr Grainger? 10 A. He was lying on his back in the parking space next to 11 the Audi, on its offside. 12 Q. Who if anyone was attending to him? 13 A. U2, I think J4. 14 Q. Was U2 pulling his clothes up and thereby exposing 15 a gunshot wound on the upper left-hand side of his 16 chest? 17 A. Yes. 18 Q. What was J4 doing? 19 A. He was holding his head, making sure that his airway was 20 open. 21 Q. You say that you opened a trauma pack. Where had that 22 come from? 23 A. To be honest I don't know. Somebody had brought it and 24 left it next to us. 25 Q. Did U2 say that Mr Grainger was unresponsive?</p> <p style="text-align: center;">Page 73</p>	<p>1 A. I think they were both unresponsive and there was no 2 pulse. 3 Q. Did V3 then begin some chest compressions? 4 A. Yes. 5 Q. You say you swapped the oxygen mask for a pocket mask 6 and reconnected the oxygen to that, just explain what 7 that is? 8 A. The normal oxygen mask is for somebody who is normally 9 breathing. The pocket mask gives an opportunity for us 10 to do assisted breathing. Basically it has a hole in 11 the top so we can actually blow into the lungs. 12 Q. Did you and other officers begin CPR? 13 A. Yes. 14 Q. Did there come a stage when you swapped the oxygen 15 cylinders? 16 A. Yes. 17 Q. Did you continue that process until the ambulance 18 service arrived? 19 A. Yes. 20 Q. When they had arrived, did a paramedic say that 21 Mr Grainger was dead? 22 A. Yes. 23 Q. Did you then travel to Openshaw and then to 24 Claytonbrook? 25 A. Yes.</p> <p style="text-align: center;">Page 75</p>
<p>1 A. Yes. 2 Q. Did J4 ask for an airway? 3 A. Yes. 4 Q. Did, after you passing him the airway, he insert the 5 airway? 6 A. Yes. 7 Q. Did you connect the oxygen mask? 8 A. Yes. 9 Q. Did you then seek to find other wounds on Mr Grainger's 10 body? 11 A. Yes. 12 Q. Could you find any? 13 A. No. 14 Q. Did you apply a chest seal to the entry wound? 15 A. Yes. Yes, I did. 16 Q. At any stage did you see any signs of life from 17 Mr Grainger? 18 A. No. 19 Q. Did you check his pulse? 20 A. No. 21 Q. Were you aware of anyone else checking his pulse? 22 A. Yes, I think U2 did. 23 Q. Did anyone check his pupils? 24 A. I think U2 did that. 25 Q. What was the result of each of those checks?</p> <p style="text-align: center;">Page 74</p>	<p>1 Q. You say in your statement that at Claytonbrook you 2 "fully complied with the post-incident process". What 3 did you mean by that you fully complied with the 4 post-incident process? 5 A. We were sat in a room for a very long time and then we 6 handed our weapons in one by one. 7 Q. What other parts of the post-incident process did you 8 comply with? 9 A. There wasn't much else to comply with on the evening. 10 We didn't confer, we just sat pretty much in silence for 11 quite a long time. 12 Q. Was Q9 amongst you? 13 A. Yes. 14 Q. Did anyone say to Q9: why did you fire? 15 A. No. 16 Q. Nobody was interested why one of your colleagues had 17 fired a shot? 18 A. Interested or not, nobody asked the question. 19 Q. Were you interested? 20 A. No. 21 Q. Why not? 22 A. Because that is down to Q9, not myself. 23 Q. Was that your understanding of the feeling of the rest 24 of the room, nobody wanted to know why Q9 had fired 25 a shot?</p> <p style="text-align: center;">Page 76</p>

<p>1 A. I am sure there is an overwhelming wanting to actually 2 understand fully what everybody else is thinking, but 3 during the -- certainly during the PIP process that has 4 never been allowed and therefore doesn't even come into 5 bear.</p> <p>6 Q. Was there any stage in the PIP where a non-conferral or 7 no conferring warning was given?</p> <p>8 A. I can't remember one.</p> <p>9 Q. You say in your statement that you fully complied with 10 the post-incident procedure. 11 Part of that post-incident procedure, both in the 12 manual of guidance and a GMP SOP for the purpose, is 13 that the post-incident manager establishes the basic 14 facts from somebody other than a principal officer, and 15 that the basic facts will be provided, subject to legal 16 advice, in verbal or written format. They should be 17 recorded by the post-incident manager, confirmed with 18 the person providing the facts and signed for. 19 Did the post-incident manager undertake that process 20 with you?</p> <p>21 A. No.</p> <p>22 Q. Did you see him undertake that process with anyone?</p> <p>23 A. No.</p> <p>24 Q. Who, to your knowledge, was the post-incident manager?</p> <p>25 A. I forget his name. Chief Inspector.</p> <p style="text-align: center;">Page 77</p>	<p>1 before you went off duty?</p> <p>2 A. No.</p> <p>3 MR BEER: Yes, thank you very much. They are the questions 4 I ask. 5 THE CHAIRMAN: Mr Thomas. 6 MR THOMAS: Thank you, sir. 7 Questions from MR THOMAS 8 MR THOMAS: Good morning, I represent Mr Grainger's family, 9 okay. 10 You said that you have been a police officer since 11 1997; is that right?</p> <p>12 A. Yes.</p> <p>13 Q. And a firearms officer since?</p> <p>14 A. 2004.</p> <p>15 Q. Yes. So by the time of this incident in 2012, you had 16 considerable amount of experience as a firearms officer, 17 correct?</p> <p>18 A. Yes.</p> <p>19 Q. You would have heard a MP5 being fired on many 20 occasions?</p> <p>21 A. With ear defenders on, yes.</p> <p>22 Q. Would I be right in thinking, G6, that this was your 23 involvement in your first fatality, where somebody had 24 been shot by a police officer?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 79</p>
<p>1 Q. Hughes or Simpson?</p> <p>2 A. Simpson, apologies.</p> <p>3 Q. For how long did you remain in the room, aside from the 4 unloading procedure?</p> <p>5 A. Quite a long time; I left at 6.30 in the morning.</p> <p>6 Q. So what five or six hours?</p> <p>7 A. Yes.</p> <p>8 Q. Did everyone sit in silence in that period?</p> <p>9 A. Pretty much. Any conversations were absolutely non-work 10 related.</p> <p>11 Q. Stage 3 of the post-incident procedure is that, again 12 subject to legal and medical advice, officers should 13 provide a personal initial account of the incident 14 before going off duty. Did you do that?</p> <p>15 A. No.</p> <p>16 Q. Why not?</p> <p>17 A. It wasn't asked.</p> <p>18 Q. Nobody asked you to provide an account?</p> <p>19 A. No.</p> <p>20 Q. Were there any lawyers in the room with you?</p> <p>21 A. There were federation people, there were lawyers, there 22 were the PIM coming in and out of the room constantly.</p> <p>23 Q. Was there any discussion that you heard or were a party 24 to over whether or not an initial account should be 25 given by each of the officers, including yourself,</p> <p style="text-align: center;">Page 78</p>	<p>1 Q. Yes. 2 This would have been very significant to you?</p> <p>3 A. Yes.</p> <p>4 Q. Yes. 5 You had not given an account on the day -- I am not 6 going to ask you why that was -- but we do know that you 7 gave an account six days later.</p> <p>8 A. Yes.</p> <p>9 Q. When you gave your account six days later, that was when 10 you had an opportunity to reflect on what had taken 11 place previously, correct?</p> <p>12 A. Yes.</p> <p>13 Q. You must have been giving this in those six days some 14 considerable thought?</p> <p>15 A. Yes.</p> <p>16 Q. You wanted to get it right, didn't you?</p> <p>17 A. Yes.</p> <p>18 Q. You wanted to get the timings right in relation to what 19 you heard, when you heard it and the sequence in which 20 you heard things. Correct?</p> <p>21 A. Yes.</p> <p>22 Q. Is that what you did in your first statement?</p> <p>23 A. I tried my best to put what I had in my memories, to the 24 knowledge of the incident that happened in front of me.</p> <p>25 Q. Can you just help me with this, G6, did I understand</p> <p style="text-align: center;">Page 80</p>

<p>1 your evidence correct that there was a point when you 2 were trying to get Mr Grainger out of the vehicle but 3 from the other side, so from the passenger side? 4 A. No, I never got him out of that side. 5 Q. Did there come a point when you went round to the 6 passenger side? 7 A. No, well only when I was doing the trauma, Mr Grainger 8 was already out on the ground. 9 Q. There came a point when you looked into the vehicle, 10 wasn't there? 11 A. Yes, when I was trying to open the door to get 12 Mr Grainger out of the driver's door. 13 Q. Right. 14 Can we just have a look at a photograph, please. 15 Can we go to bundle O, and it is page -- 16 THE CHAIRMAN: O1 or O2? 17 MR THOMAS: O1, sir, page 517. 18 It should be a series of photographs. 19 A. Can I just confirm it is the same picture, 517 is not -- 20 Q. Yes, it should be a photograph from the passenger side 21 of the front of the Audi with a load of smashed glass 22 and what appears to be the CS canister on the seat? 23 A. Yes. 24 Q. Yes? 25 There was a point, wasn't there, during this, where</p> <p style="text-align: center;">Page 81</p>	<p>1 Q. Are you saying that you didn't see all of this smashed 2 glass? 3 A. No, I didn't. U2 was right across all of that smashed 4 glass and reaching right all the way across. The hands 5 were actually passed through towards U2. I was standing 6 by the B pillar. The only angle I could see was the 7 steering wheel and Mr Grainger. 8 Q. Maybe you didn't see it at that point, but you were 9 there -- I mean to say, one of the things that you and 10 your colleagues would have been really concerned about, 11 G6, is the presence of weapons in this vehicle. 12 Correct? 13 A. Yes. 14 Q. Yes. There came a time when Mr Grainger had been shot, 15 correct? 16 A. Yes. 17 Q. Are you telling me that you and your colleagues didn't 18 look in the vehicle for weapons? 19 A. My colleagues might have done. The view I had was of 20 the steering wheel and Mr Grainger. I have then gone to 21 the boot of the vehicle. The back door was never opened 22 when I was there. And the rest of the time I spent 23 performing trauma on Mr Grainger. 24 Q. After the trauma had been performed and Mr Grainger had 25 unfortunately and tragically died, are you telling me</p> <p style="text-align: center;">Page 83</p>
<p>1 you were pushing or trying to push or assisting in 2 trying to push Mr Grainger from the driver's side to the 3 passenger side? 4 A. No. 5 Q. No? 6 A. No. 7 Q. Can we just -- maybe it is me misunderstanding your 8 evidence -- 9 A. Would you like me to explain the movement as I have come 10 back round, Mr Grainger is with both hands out of the 11 driver's door window towards the front of the vehicle. 12 Q. Can I just put to you what you say and then -- yes? You 13 say this in your statement, this is: 14 "Before I could get to the handle I heard another 15 officer shout from inside the cabin 'pass him through'. 16 And I then pushed Grainger towards the passenger side of 17 the vehicle and U2 was waiting to grab him." 18 Yes? 19 A. Yes. 20 Q. Right, so that is the part I just want to clarify with 21 you. 22 A. I see. 23 Q. That is you with hands on Mr Grainger trying to push him 24 towards the passenger side of the vehicle, correct? 25 A. Yes.</p> <p style="text-align: center;">Page 82</p>	<p>1 you never looked in the vehicle? 2 A. No. 3 Q. Let's come back then, if I may, to what you say in your 4 first account. There you are, firearms officer of some 5 considerable experience, you know what a shot sounds 6 like. You say quite clearly that you hear three shots, 7 don't you, in your witness statement, your first 8 account? 9 A. I do, in hindsight I should have said "three bangs". 10 Q. You don't say "three bangs", you say "three shots". 11 A. I know. 12 Q. Let's examine what you have said. 13 May I make this suggestion to you, at the time you 14 hear the first shot, the one thing that you and I can 15 agree on is this. Your colleague, X7, was covering 16 Mr Grainger, wasn't he? 17 A. Yes. 18 Q. You have already demonstrated to Mr Beer how he had his 19 weapon aimed at Mr Grainger, covering him, so he was 20 there and if there was any threat that Mr Grainger 21 posed, that colleague, X7, was there covering 22 Mr Grainger, correct? 23 A. When the window was popped, yes. 24 Q. Sorry? 25 A. When the window got smashed, yes.</p> <p style="text-align: center;">Page 84</p>

1 Q. No, sorry, forgive me, it is before the window --
 2 firstly, you don't say anything about a window being
 3 smashed. Do you?
 4 **A. It was only subsequently I even knew that the window had**
 5 **been smashed.**
 6 Q. Yes, well I am concentrating on what you say in your
 7 first statement, not what you subsequently say some two
 8 months afterwards.
 9 **A. Okay.**
 10 Q. Let's just concentrate on your first account.
 11 Can I take you to that paragraph in your witness
 12 statement, it is on the bottom of page 123. Tell me
 13 when you are there.
 14 **A. Yes.**
 15 Q. Let's just look at the paragraph in full:
 16 "I then alighted from the front passenger seat of
 17 the bravo vehicle."
 18 I assume you would have been moving very quickly?
 19 **A. Yes.**
 20 Q. Because that is the point of the strike, isn't it, to
 21 get into position as quickly as you can?
 22 **A. Yes.**
 23 Q. "I saw there was only one officer going round to the
 24 front of the alpha vehicle and on to the driver's side
 25 of the Audi and decided to follow."

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1 Correct?
 2 **A. Yes.**
 3 Q. Just pause there.
 4 Your vehicle is very close, you are in the bravo
 5 vehicle and you are very close to the alpha vehicle,
 6 aren't you, as you are pulling into the car park,
 7 correct?
 8 **A. Yes.**
 9 Q. You are right at the front, you are in the front
 10 passenger seat, correct?
 11 **A. Yes.**
 12 Q. We have heard from one of your colleagues who had a door
 13 open, ready to -- and in fact jumped out before the
 14 vehicle came to a stop. Did you have your door open
 15 ready to jump out?
 16 **A. The door was cracked, I didn't get out until it stopped.**
 17 Q. When you say the door was "cracked", it was partially
 18 open, is that what you mean?
 19 **A. Yes.**
 20 Q. Was your window down?
 21 **A. No.**
 22 Q. Your door is partially open, you are ready to get into
 23 position. Just tell me this. As you see, there you
 24 are, you are, what, a couple of metres behind the alpha
 25 vehicle?

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1 **A. A few metres, yes.**
 2 Q. We are not talking great distances, are we?
 3 **A. No.**
 4 Q. No.
 5 You actually see the alpha vehicle come to a stop,
 6 don't you?
 7 **A. Yes.**
 8 Q. Then your vehicle comes to a stop and then you get out
 9 and you deploy, correct?
 10 **A. Yes.**
 11 Q. The one thing you don't say, before you get out of your
 12 vehicle and deploy, you make no mention whatsoever, do
 13 you, of hearing any gunshot, a firearm shot, do you?
 14 **A. No.**
 15 Q. But you were in a position to hear, weren't you?
 16 **A. I was inside a vehicle.**
 17 Q. You were --
 18 **A. Everybody was in a position to hear.**
 19 Q. You were in a position to hear, and yet your evidence
 20 is, right, a couple of metres behind the alpha vehicle,
 21 you hear no firearms before you deploy, do you?
 22 **A. No.**
 23 Q. No. Then you deploy, you go to the driver's side of the
 24 red Audi --
 25 **A. Yes.**

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1 Q. -- and you see your colleague, X7, covering the driver.
 2 **A. Yes.**
 3 Q. Let's come back to your witness statement, because this
 4 is what you say:
 5 "As I rounded the front of the alpha vehicle I could
 6 see X7 in the front challenging the male in the driver's
 7 seat [you say you now know him to be Anthony Grainger].
 8 I then went along the driver's side [this is afterwards]
 9 in order to get to the rear offside door and cover it.
 10 As I reached the front offside wheel arch of the Audi
 11 I was right behind X7 and I heard a shot."
 12 That is what you say.
 13 **A. That is what I said there, and later I have corrected**
 14 **it.**
 15 Q. Before we come to the corrections, let's just look at
 16 the sequence. What is clear -- let's put what you think
 17 you heard now to one side -- is your colleague has
 18 clearly got Mr Grainger covered before you hear
 19 anything. Correct?
 20 **A. Yes.**
 21 Q. And then you hear a shot, as you describe in your first
 22 statement.
 23 **A. Yes.**
 24 Q. You see I am going to make this suggestion to you. I am
 25 going to suggest you are now trying to row your

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<p>1 colleague Q9 out by saying it was not a shot that you 2 heard. Do you follow? 3 A. I don't even know when Q9 shot. 4 Q. I am going to make that suggestion for this reason, 5 because you know that if it was a shot, Q9 would have 6 real difficulties trying to justify why he shot 7 Mr Grainger when X7 was clearly covering him. Do you 8 follow? 9 A. No. Unfortunately I don't, because the threat 10 assessment from Q9 is a threat assessment from Q9. 11 Q. Help us with this. Who was the discussion with that 12 made you alter your evidence? You didn't answer that 13 question with Mr Beer. 14 A. I can't remember where that came from, but it came from 15 a directive that none of us were to deploy the CSDC and 16 then the conversation came that the window had gone in 17 and the CSDC had gone in. 18 Q. Let's take a step back and unpick this. You made 19 a witness statement, you knew the importance of this 20 witness statement, a man had been killed. Correct? 21 A. Yes. 22 Q. Some two months later you decide to alter your witness 23 statement. 24 A. From further facts that became apparent at the time. 25 Q. Bear with me, bear with me.</p> <p style="text-align: center;">Page 89</p>	<p>1 Q. What you describe -- what you initially describe as 2 a shot, okay, I am not going to go over our discussion, 3 but what you initially describe as a shot, the one thing 4 that you and I can agree on is there was no challenge 5 before that shot? 6 A. No. 7 MR THOMAS: Right. That is all I ask. 8 THE CHAIRMAN: Mr Weatherby, I would quite like if possible 9 to be able to finish this witness's evidence before the 10 short adjournment -- 11 MR WEATHERBY: I don't think I will be very long. 12 THE CHAIRMAN: -- and I know Ms Whyte may well have -- 13 MS WHYTE: Very few, two to three minutes. 14 THE CHAIRMAN: Are you happy for us to carry on? 15 MS WHYTE: Yes, more than happy. 16 THE CHAIRMAN: Thank you, I am grateful. 17 MR WEATHERBY: I will be as quick as I can, it may be 18 slightly after 1.00. 19 THE CHAIRMAN: I am quite happy with that, and you are not 20 to feel rushed Mr Weatherby. 21 MR WEATHERBY: Thank you very much. 22 Questions from MR WEATHERBY 23 MR WEATHERBY: Can I just pick up, and very quickly, on the 24 shot because you have been asked a lot of questions by 25 Mr Beer and Mr Thomas.</p> <p style="text-align: center;">Page 91</p>
<p>1 Two months later you decide to alter your witness 2 statement, we are entitled to know the basis upon which 3 you did it. Tell us, try, who was it that you were in 4 discussions with? Try. 5 A. I can't recollect who it was. 6 Q. That is convenient, isn't it? 7 THE CHAIRMAN: That is a comment. 8 MR THOMAS: Can we agree this. When you went past X7, you 9 went past when X7 was covering Anthony Grainger, you did 10 that because you thought there was no need to assist X7 11 because your threat assessment was Anthony Grainger at 12 that point was less of a threat and you wanted to see 13 who was in the rear of the vehicle and cover the rear of 14 the vehicle? 15 A. Yes. 16 Q. Ah, just one other thing. This is my last question. 17 You have talked about X7 and hearing X7 challenge 18 Anthony Grainger, correct? 19 A. Yes. 20 Q. This sound, which you have described as a shot, and 21 I know you are trying to row back on that now and say 22 you thought it was smashed glass, but before that sound, 23 whatever that was or may have been, did you hear anybody 24 else challenge? 25 A. No.</p> <p style="text-align: center;">Page 90</p>	<p>1 I represent Anthony's Grainger's partner. The 2 original statement, you know that there were three 3 shots, yes? 4 A. I know there was three shots -- 5 Q. Yes, and you knew at the time there were three shots, 6 there was the fatal shot and there were the two shotgun 7 shots. Yes? 8 A. Yes. 9 Q. At the time you make your first statement, you are 10 describing all three of those shots? 11 A. All three of those noises, yes. 12 Q. Well in fact you were describing all three of those 13 shots, you subsequently change your mind about the first 14 one, but you were describing all three shots. Weren't 15 you? 16 A. I was describing all three noises and from the knowledge 17 that I knew of the actual incident, I was placing the 18 noises in the correct order. 19 Q. Yes, now, having clarified/changed, however it is 20 described, your account two months later, you are 21 describing two of the shots? 22 A. Yes. 23 Q. Can you help us now, given that you were in the position 24 that you were, and I won't go through that again, when 25 was the third shot or the first shot?</p> <p style="text-align: center;">Page 92</p>

<p>1 A. Sorry, which one?</p> <p>2 Q. Can you help us, you were in a position to hear, weren't</p> <p>3 you, you were in a position to hear all three shots?</p> <p>4 A. Sorry, which shot are you actually talking about?</p> <p>5 I heard the two shotgun shots. The first shotgun shot</p> <p>6 was as I was going down the side of the red Audi and the</p> <p>7 third shot, or the second shotgun round, went off when</p> <p>8 I was covering the rear door of the Audi.</p> <p>9 Q. Yes, so given the evidence that you have already told us</p> <p>10 about when and where you were, you were in a position to</p> <p>11 hear the first or the third shot or whenever it was, but</p> <p>12 the not the two shotgun shots, the fatal shot?</p> <p>13 A. Yes.</p> <p>14 Q. You were in a position to hear that, weren't you?</p> <p>15 A. I can't recollect that noise.</p> <p>16 Q. You just cannot recollect it?</p> <p>17 A. No.</p> <p>18 Q. Did you see Q9 during the incident at all?</p> <p>19 A. No.</p> <p>20 Q. The first time you saw Q9 was when?</p> <p>21 A. Back at Openshaw.</p> <p>22 Q. Back at Openshaw?</p> <p>23 A. Yes.</p> <p>24 Q. From your position, down the side of the driver's side,</p> <p>25 you didn't see Q9?</p> <p style="text-align: center;">Page 93</p>	<p>1 or anything of that nature?</p> <p>2 A. We were advised not to write anything down.</p> <p>3 Q. You were advised not to write anything down?</p> <p>4 A. Yes.</p> <p>5 Q. Who by?</p> <p>6 A. I think it was the force solicitor or the lawyer on the</p> <p>7 night.</p> <p>8 Q. Right. The force solicitor?</p> <p>9 A. I might have mis -- that might not be the right actual</p> <p>10 person, but the solicitor that turned up or the legal</p> <p>11 representative that turned up on the night.</p> <p>12 Q. Right, so it was a legal representative that turned up</p> <p>13 and gave you advice?</p> <p>14 A. Yes.</p> <p>15 Q. Who provided that legal representative, was it the</p> <p>16 force, was it the Police Federation?</p> <p>17 A. I think it was the Federation but, again, I can't</p> <p>18 remember.</p> <p>19 Q. You didn't give anything until you were called back on</p> <p>20 the 9th -- you didn't commit anything to writing until</p> <p>21 you were called back on the 9th and the reason is</p> <p>22 because of a lawyer, you think was provided by the</p> <p>23 Police Federation, advising you not to?</p> <p>24 A. Yes.</p> <p>25 Q. Finally -- well, sorry, two short topics.</p> <p style="text-align: center;">Page 95</p>
<p>1 A. No.</p> <p>2 Q. You have told us that you went back to Openshaw and then</p> <p>3 Claytonbrook, yes?</p> <p>4 A. Yes.</p> <p>5 Q. You have told us that you were in a room with the others</p> <p>6 at Claytonbrook for five to six hours?</p> <p>7 A. Yes.</p> <p>8 Q. That included Q9?</p> <p>9 A. Yes.</p> <p>10 Q. Obviously, no doubt all of you would go to the toilet</p> <p>11 and things like that, but was Q9 there throughout that</p> <p>12 period?</p> <p>13 A. As far as I remember, yes.</p> <p>14 Q. Yes. You have told Mr Beer -- I will deal with this</p> <p>15 quickly, because you have dealt with most of this topic</p> <p>16 with him -- that you gave your first written account six</p> <p>17 days late because Mr Hughes was in discussion with the</p> <p>18 IPCC about interviews.</p> <p>19 A. That was my understanding of it.</p> <p>20 Q. Right. That was your understanding because you had been</p> <p>21 told that, presumably?</p> <p>22 A. Yes.</p> <p>23 Q. Can you explain why another officer being in discussion</p> <p>24 with the IPCC prevented you from making a pocket</p> <p>25 notebook entry or another account in another statement</p> <p style="text-align: center;">Page 94</p>	<p>1 You referred I think earlier to a list of</p> <p>2 deployments, previous deployments on Shire that you had</p> <p>3 referred to.</p> <p>4 A. Yes.</p> <p>5 Q. Yes?</p> <p>6 Was that at the meeting on 9 March?</p> <p>7 A. No, I think that was some time later.</p> <p>8 Q. Some time later?</p> <p>9 Thank you.</p> <p>10 Finally, can I ask you about bravo car. You were</p> <p>11 the front passenger?</p> <p>12 A. Yes.</p> <p>13 Q. In bravo, you had a tablet.</p> <p>14 A. Yes.</p> <p>15 Q. Were you using the tablet that day?</p> <p>16 A. No.</p> <p>17 Q. So it was turned off?</p> <p>18 A. The battery had run out on that.</p> <p>19 MR WEATHERBY: Thank you very much.</p> <p>20 MS COLLINS: Just one or two matters, please, sir.</p> <p>21 THE CHAIRMAN: Yes.</p> <p>22 Questions from MS COLLINS</p> <p>23 MS COLLINS: My name is Emma Collins and I ask questions on</p> <p>24 behalf of Q9.</p> <p>25 As you were approaching the subject vehicle, your</p> <p style="text-align: center;">Page 96</p>

24 (Pages 93 to 96)

<p>1 attention was on the driver in particular, is that 2 correct? 3 A. Yes. 4 Q. But looking into the cabin, the front cabin of the car? 5 A. Yes. 6 Q. Were you aware of anyone in the passenger seat -- 7 A. No. 8 Q. -- at that time? 9 A. No. 10 Q. Were you conscious that there was nobody in the 11 passenger seat or you just weren't aware one way or the 12 other? 13 A. I wasn't aware one way or the other. 14 Q. In terms of the sounds that you have heard, you have of 15 course explained why you now say the first bang was the 16 breaking of the window. You explained that the two 17 other sounds were sounds distinctively from shotguns; is 18 that correct? 19 A. Yes. 20 Q. Finally, in terms of the point at which you hear the 21 shouts of "trauma", that was just after the point where 22 you were passing Mr Grainger through to U2. Is that 23 correct? 24 A. No, I think that was as I got to the boot. 25 Q. After passing or trying to assist with Mr Grainger</p> <p style="text-align: center;">Page 97</p>	<p>1 those questions? 2 A. Yes. 3 Q. In order to have effected that, you would have had to 4 have lengthened your approach into the car park wouldn't 5 you by turning right again and then right into a no 6 entry into the car park. 7 A. Yes, the long way -- if you want to describe it as that, 8 long way round into the car park itself but tactically 9 it would not be as practical as you would be on view of 10 the vehicle for quite a long time. 11 Q. That is what I wanted to briefly explore with you. The 12 object as we have understood it is for you to remain 13 covert for as long as conceivably possible? 14 A. Yes. 15 Q. You have explained already that in part that is why you 16 drive on to the plot at an ordinary car park speed? 17 A. Yes. 18 Q. If you had driven on to the plot face on to the Audi, 19 does it follow as a matter of common sense that that 20 would have given potentially the occupants longer for 21 them to see a convoy of vehicles coming towards them the 22 wrong way? 23 A. Yes, it would certainly show out before we needed to get 24 as close as we possibly can. 25 Q. Might that show something out of the ordinary in</p> <p style="text-align: center;">Page 99</p>
<p>1 through to U2, and after you were at the boot? 2 A. Yes. 3 Q. Perhaps it is logical that there was nobody sitting in 4 the passenger seat at that time, it was simply U2 5 leaning into the passenger seat. Is that right? 6 A. Yes. 7 MS COLLINS: Thank you. 8 Questions from MS WHYTE 9 MS WHYTE: G6, you cannot see me but as has already been 10 explained to you I am asking questions on behalf of the 11 Greater Manchester Police and you know that I am 12 Anne Whyte. 13 Can you hear me? 14 A. Yes, that is fine. 15 Q. Thank you. I have three short matters for you. 16 Does it follow from the way in which you answered 17 Mr Beer's questions about why you might have been moving 18 off or thinking you were moving off at about 6.15 that 19 night, that you were unaware of what if any information 20 was available from downloads of a vehicle tracking 21 device on Mr Grainger's Volkswagen vehicle that evening? 22 A. Yes, we never had sight of that. 23 Q. Thank you. 24 You have also been asked about the option of 25 a nose-to-nose deployment in the car park, do you recall</p> <p style="text-align: center;">Page 98</p>	<p>1 circumstances where you wanted very much to look 2 ordinary? 3 A. Yes, definitely. 4 Q. Finally, I would just like to ask you about the location 5 of an officer who may be tasked to use his shotgun and 6 whether that is inevitably or invariably an officer who 7 has been in the same vehicle as the officer who is 8 tasked with or may be required to deploy his CS, all 9 right. 10 As far as your training is concerned, in 2011, did 11 it necessarily follow that the training scenarios 12 involved both the shotgunner and the CS operator being 13 in the same vehicle? 14 A. Not only the same vehicle but the same person. They 15 would both be in the number 3 position in the charlie, 16 and the bravo and that person would multi role between 17 either CSDC deployment and a shotgunner. 18 Q. If we look, for example, and I will do this very 19 briefly, would you turn to the second of the generic 20 firearms officer bundles. We will look at a package 21 from November 2011, which is at bundle 2 of the general 22 packages bundles, tab 32 I think in most people's 23 bundle, page 262. 24 This is a "Covert vehicle stop refresher scenario" 25 in November 2011. Do you have that?</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

1 **A. I think the deployment you are looking for is on**
 2 **page 261.**
 3 Q. Yes, sorry, previous page, 261, you are quite correct.
 4 Can we see where it says "Bravo and charlie car" in
 5 bold font. Towards the bottom of the page it says:
 6 "B3, C3, carbine ..."
 7 SG?
 8 **A. Shotgun.**
 9 Q. Thank you:
 10 "CS, if special munitions, SLP and Taser."
 11 What does that indicate to the trainee?
 12 **A. That the training obviously evolves over time and the**
 13 **deployment as it was then was that one person would do**
 14 **both the carbine -- sorry, do the shotgunning and the CS**
 15 **dispersal if required.**
 16 MS WHYTE: Thank you.
 17 Thank you, sir.
 18 Further questions from MR BEER
 19 MR BEER: Just two topics please if I may.
 20 Firstly, can you take out O1, the photograph bundle,
 21 please. Before we get there, I think you said that you
 22 came out of the front passenger seat of your vehicle,
 23 ran forwards. Is that right?
 24 **A. Yes.**
 25 Q. Where did you go then, did you go between vehicles or

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1 round the front of the alpha?
 2 **A. Round the front of the alpha.**
 3 Q. Did you jump on the bonnet of the alpha?
 4 **A. No, it was tight. I had to shuffle through, it wasn't**
 5 **impossible.**
 6 Q. You didn't have to do sort of a knee slide or anything
 7 like that --
 8 **A. No.**
 9 Q. -- as we see in television programmes?
 10 **A. No.**
 11 Q. Just look at page 437, please, which is about an inch
 12 from the back. 436 as well actually. Was that the
 13 position that the alpha vehicle was in?
 14 **A. Yes.**
 15 Q. You said that it was tight, what, so you had to, with
 16 your weapon on aim at this time?
 17 **A. No.**
 18 Q. How were you carrying your weapon?
 19 **A. My weapon was in the pointing down.**
 20 Q. With two hands on it?
 21 **A. One hand on.**
 22 Q. One hand on?
 23 **A. Pushing and I had to lean slightly forward and just push**
 24 **my way through the actual bushes.**
 25 Q. You had to scabble your way through these bushes?

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1 **A. Slightly.**
 2 Q. Does this accurately depict the position that the alpha
 3 vehicle was in when you went past it?
 4 **A. Yes, I think there is a slightly different angle that**
 5 **shows -- there was a recess there, it was not actually**
 6 **in the bushes itself, it was tight, there was a small**
 7 **gap of maybe six or seven inches. I had to go sideways**
 8 **through that gap, but there was a gap.**
 9 Q. You have studied these photographs carefully, have you?
 10 **A. I had a quick look through the pictures and I am sure**
 11 **I saw --**
 12 Q. I couldn't see one, I have tried to pick the fairest one
 13 but I am sure if there is another one we will find it in
 14 due course.
 15 Mr Straw says 378. Thank you.
 16 Is that the one you were thinking of?
 17 **A. That is a better description, yes.**
 18 Q. We can see that there is some dead bush?
 19 **A. Yes, where the dead bush is there is obviously a little**
 20 **bit more of a space. The green bushes from the angle**
 21 **are obviously grown out.**
 22 Q. From the previous photographs?
 23 **A. Yes.**
 24 Q. You went through that gap there; is that right?
 25 **A. Yes.**

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1 Q. The second topic is that on 3 March, by the end of the
 2 incident, you were aware that Mr Grainger had been shot
 3 and shot by a police officer?
 4 **A. Yes.**
 5 Q. In the immediate aftermath, I think it was established
 6 that it was Q9 that had fired the shot?
 7 **A. Yes.**
 8 Q. That was whilst you were at the scene?
 9 **A. No. It was after. When we got back to either Openshaw**
 10 **or Claytonbrook.**
 11 Q. It was not established, there wasn't any discussion at
 12 the scene before you left the scene?
 13 **A. I can't remember a discussion. I know that Q9 had**
 14 **already disappeared with other officers.**
 15 Q. When then, at Claytonbrook, you knew that Q9 had fired
 16 the shot, that I think had killed Mr Grainger, did you
 17 think, "I had heard the shot that Q9 had fired that
 18 killed Mr Grainger"?
 19 **A. No, it was only on reflection when I had to think about**
 20 **exactly the movements of what I had done and what I had**
 21 **heard.**
 22 Q. When you came to make your statement on 9 March, when
 23 you described having heard a shot when you were
 24 effectively by or near X7 going down the offside of the
 25 Audi, were you working on the basis that that was Q9's

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<p>1 shot?</p> <p>2 A. I was working on the basis that three rounds had been</p> <p>3 fired and there was no other explanation for any other</p> <p>4 bang and that the bang or the pop that I heard must have</p> <p>5 then been that. However, in hindsight and knowing the</p> <p>6 window had already gone, I would have said it was the</p> <p>7 window right from the beginning.</p> <p>8 Q. You were clear I think in your account on 9 March that</p> <p>9 the two subsequent noises were the same as each other</p> <p>10 and were shotguns?</p> <p>11 A. Yes.</p> <p>12 Q. Putting those to one side. The first noise that you</p> <p>13 heard, when you made your statement on 9 March, you were</p> <p>14 working on the basis that that was Q9's shot?</p> <p>15 A. Yes.</p> <p>16 Q. You told us that it was as a result of a discussion and</p> <p>17 as a result of the withdrawal of the tactic --</p> <p>18 A. Yes.</p> <p>19 Q. -- that you changed your account, or you made a further</p> <p>20 statement?</p> <p>21 A. Yes.</p> <p>22 Q. What was it about the withdrawal of the tactic that led</p> <p>23 to you changing your account?</p> <p>24 A. It was during that discussion as to why the CSDC was</p> <p>25 withdrawn that it became apparent that the window had</p> <p style="text-align: center;">Page 105</p>	<p>1 after the event, that the window had been broken led you</p> <p>2 to reassess the noise that you heard?</p> <p>3 A. Because the initial noise, the initial pop or bang or</p> <p>4 shot, was quite considerably less than the shotguns.</p> <p>5 Bearing in mind that we always wear our ear defenders</p> <p>6 when we are shooting and I was aware that there were</p> <p>7 three shots fired. The connection was made but when</p> <p>8 I had the full facts of the window going in, it made</p> <p>9 more sense and makes perfect sense that it was the</p> <p>10 window being popped rather than a shot being fired.</p> <p>11 MR BEER: I am not going to pursue that further, thank you</p> <p>12 very much.</p> <p>13 Sir, unless you have questions.</p> <p>14 Questions from THE CHAIRMAN</p> <p>15 THE CHAIRMAN: Just one thing, if I can cover it. It is</p> <p>16 going back to the post-incident procedure.</p> <p>17 A. Yes, sir.</p> <p>18 THE CHAIRMAN: If you had been left to your own devices,</p> <p>19 first of all is that something you would have been --</p> <p>20 you would have preferred, in other words for someone to</p> <p>21 have said to you, "Would you go into a room by yourself</p> <p>22 and just make a statement"?</p> <p>23 A. Yes.</p> <p>24 THE CHAIRMAN: If that had happened and you had been allowed</p> <p>25 to go into a room with a piece of paper and make</p> <p style="text-align: center;">Page 107</p>
<p>1 been broken on the Audi --</p> <p>2 Q. And --</p> <p>3 A. -- and then that made different sense to my noises in</p> <p>4 the chronological order.</p> <p>5 Q. But why -- firstly, you don't recall who the discussion</p> <p>6 was with?</p> <p>7 A. No.</p> <p>8 Q. Was there any link between the tactic being withdrawn</p> <p>9 and the breaking of the window?</p> <p>10 A. You would have to put that to the person who has</p> <p>11 withdrawn the tactic.</p> <p>12 Q. No, but in the discussion that you were party to?</p> <p>13 A. Sorry, rephrase the question.</p> <p>14 Q. Yes, you said that in the course of the discussion,</p> <p>15 about the withdrawal of the tactic it became apparent</p> <p>16 that the window had been broken.</p> <p>17 A. Yes.</p> <p>18 Q. Was that the first time, three months on, that you were</p> <p>19 aware that the window had been broken?</p> <p>20 A. Yes.</p> <p>21 Q. That is despite Mr Thomas having shown you the</p> <p>22 photographs of quite a considerable amount of glass on</p> <p>23 the passenger seat?</p> <p>24 A. Yes, I didn't go anywhere near the vehicle.</p> <p>25 Q. Why is it that the knowledge, acquired three months</p> <p style="text-align: center;">Page 106</p>	<p>1 a statement, would you have included things like details</p> <p>2 like the ages of the subjects or times of which you had</p> <p>3 no actual recollection, times of particular events?</p> <p>4 What you have done, would you have researched them or</p> <p>5 just left them out?</p> <p>6 A. I would have approximated.</p> <p>7 Q. You would have given an approximate, I see.</p> <p>8 Does anyone want to ask anything arising out of</p> <p>9 that?</p> <p>10 Thank you very much.</p> <p>11 Thank you. That is the end of your evidence, G6.</p> <p>12 You are now free to go and thank you for helping the</p> <p>13 Inquiry.</p> <p>14 A. Thank you, sir.</p> <p>15 THE CHAIRMAN: We will resume at 2.20.</p> <p>16 If you would just like to hang on for Mrs Shaw to</p> <p>17 come and fetch you.</p> <p>18 (1.17 pm)</p> <p>19 (The Luncheon Adjournment)</p> <p>20 (2.24 pm)</p> <p>21 MR BEER: J4, please.</p> <p>22 J4 (sworn)</p> <p>23 THE CHAIRMAN: Thank you, J4. If you wouldn't mind</p> <p>24 standing, so that everybody who is entitled to can see</p> <p>25 you --</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 A. Yes, sir.</p> <p>2 THE CHAIRMAN: -- and also everybody can hear you and you</p> <p>3 will probably find you will be referred to a number of</p> <p>4 files as you give your evidence, it is easier to handle</p> <p>5 them physically if you are standing.</p> <p>6 Thank you.</p> <p>7 Questions from MR BEER</p> <p>8 MR BEER: J4, my name is Jason Beer and I ask questions on</p> <p>9 behalf of the Inquiry. To your left-hand side, maybe</p> <p>10 underneath the folder, there should be a cypher key on</p> <p>11 which you are named and a number of your colleagues that</p> <p>12 benefit from anonymity orders are also named. If you</p> <p>13 wish to refer to any of them, please just check to see</p> <p>14 whether they have anonymity first and if so refer to</p> <p>15 them by their cypher.</p> <p>16 A. Understood, thank you.</p> <p>17 Q. There is a bundle as well. If you can open it up at</p> <p>18 tab 1, please, you should see a document which is your</p> <p>19 witness statement dated 9 March 2012, is that right?</p> <p>20 A. That's correct, yes.</p> <p>21 Q. Then at tab 2, a witness statement dated 28 May.</p> <p>22 A. 28 May, yes.</p> <p>23 Q. Tab 3, a witness statement dated 6 August.</p> <p>24 A. That's correct.</p> <p>25 Q. Tab 4, a witness statement dated 30 October.</p> <p style="text-align: center;">Page 109</p>	<p>1 A. My rank and role in March 2012 was that of a police</p> <p>2 sergeant in the specialist firearms team, with Greater</p> <p>3 Manchester Police.</p> <p>4 Q. Can you keep your voice up, please, so that everyone in</p> <p>5 the courtroom can hear.</p> <p>6 A. Yes.</p> <p>7 Q. When did you first become an AFO?</p> <p>8 A. I became an AFO in 1994.</p> <p>9 Q. Were you trained and competent in the MASTS option?</p> <p>10 A. I was. Yes.</p> <p>11 Q. When did you first become trained in the MASTS option?</p> <p>12 A. I believe it would be the early 2000s.</p> <p>13 Q. Did you undergo periodic refresher training after that?</p> <p>14 A. I did.</p> <p>15 Q. In MASTS?</p> <p>16 A. Yes.</p> <p>17 Q. Were you trained in the use of special munitions?</p> <p>18 A. I was.</p> <p>19 Q. Which special munitions?</p> <p>20 A. They would be RAM rounds, which are shotgun rounds, used</p> <p>21 for deflation of tyres, CS gas irritant, which is called</p> <p>22 RIP, and that again was from the shotgun. And, later</p> <p>23 on, the CSDC canister.</p> <p>24 Q. Were you by March 2012 qualified as a CTSFO?</p> <p>25 A. I was.</p> <p style="text-align: center;">Page 111</p>
<p>1 A. Yes.</p> <p>2 Q. Are the contents of those four witness statements true</p> <p>3 to the best of your knowledge and belief?</p> <p>4 A. They are, yes, without reading through them.</p> <p>5 Q. Sorry, what do you mean they are without reading</p> <p>6 through?</p> <p>7 A. They are from what I have seen. Obviously if ... if</p> <p>8 I read through them it is going to tell me whether they</p> <p>9 are or not but as it is, as I see them now, yes, they</p> <p>10 are.</p> <p>11 Q. When you wrote them did you try to tell the truth?</p> <p>12 A. Yes.</p> <p>13 Q. Have you read them in the past five years?</p> <p>14 A. Yes, I have.</p> <p>15 Q. Did you notice anything that was wrong with them in the</p> <p>16 last five years?</p> <p>17 A. No.</p> <p>18 Q. No? Okay, so on those two grounds, do you think the</p> <p>19 contents of them are true to the best of your knowledge</p> <p>20 and belief?</p> <p>21 A. Yes, I do.</p> <p>22 Q. Thank you. Can you tell us when you joined the police</p> <p>23 service?</p> <p>24 A. I joined the police service in January 1988.</p> <p>25 Q. What was your rank and role in March 2012?</p> <p style="text-align: center;">Page 110</p>	<p>1 Q. Were you also qualified as a TAC adviser?</p> <p>2 A. I was.</p> <p>3 Q. When did you first become a TAC adviser?</p> <p>4 A. I believe that was 2010.</p> <p>5 Q. In March 2012 were you still a qualified TAC adviser?</p> <p>6 A. Yes.</p> <p>7 Q. Did you also sometimes serve as an OFC?</p> <p>8 A. I did, yes.</p> <p>9 Q. When did you become qualified as an OFC?</p> <p>10 A. I can't recall that date. In fact -- as a TAC adviser</p> <p>11 that was before 2010.</p> <p>12 Q. Yes, I think in your statement you say:</p> <p>13 "I have been a firearms officer since 1994 and</p> <p>14 I have been a fully qualified firearms TAC adviser since</p> <p>15 2009."</p> <p>16 A. Yes.</p> <p>17 Q. Were you an OFC before you were a TAC adviser?</p> <p>18 A. I don't know, I can't recall.</p> <p>19 Q. Okay.</p> <p>20 By March 2012, did you consider yourself</p> <p>21 occupationally and operationally competent as an AFO on</p> <p>22 an operation that was using the MASTS option?</p> <p>23 A. Yes.</p> <p>24 Q. By March -- sorry, before, say, October 2011, when</p> <p>25 Operation Shire for our purposes began, did you have any</p> <p style="text-align: center;">Page 112</p>

<p>1 previous knowledge of or deployments concerning 2 Anthony Grainger? 3 A. Not to my knowledge, no. 4 Q. The same question in relation to Robert Rimmer? 5 A. No. 6 Q. What about David Totton? 7 A. Not to my knowledge, no. No. 8 Q. Were you involved in an operation in 2008 called 9 Operation Blythe? 10 A. I can't recall that operation. 11 Q. Can you recall when you first became involved in 12 Operation Shire? 13 A. I believe it was December 2011. 14 Q. December 2011? 15 Can you remember what your first involvement was? 16 A. I think it was as an OFC, operational firearms 17 commander. 18 Q. We have some records relating to deployments other than 19 2 and 3 March 2012 -- 20 A. Yes. 21 Q. -- going back into December 2011. I have been through 22 them. Does this sound right, if I summarise what they 23 show, if you can help? 24 A. Okay. 25 Q. The first deployment, 15 December 2011, you as the OFC,</p> <p style="text-align: center;">Page 113</p>	<p>1 to go through all of those eight deployments that 2 preceded 3 March but I just want to ask you a few 3 questions about the deployment on 26 January, where the 4 briefing was on 25th and you deployed on the 26th. That 5 is the Superintendent Ellison one, yes? 6 A. Right. 7 Q. I wonder whether you could look in your witness 8 statement bundle, please, at tab 4. 9 Look at page 138, please, which is the second page 10 in. 11 A. Yes. 12 Q. It is the last paragraph on that page, where you say: 13 "Op Shire was a long-running firearms operation, 14 I had previously been involved in an earlier phase of 15 Op Shire in January 2012. There was a firearms 16 authority, number 27/12 and on 26 January 2012 I was 17 required to act as the TAC for the TFC on that day, who 18 I believe has the pseudonym T8." 19 That is Superintendent Ellison, yes? 20 A. Okay. 21 Q. "My role as the TAC has been described as above. 22 Initial briefings were held with the SIO, DI Cousen, and 23 the TFC." 24 Yes? 25 A. Yes.</p> <p style="text-align: center;">Page 115</p>
<p>1 with Mr Giladi as the TFC? 2 A. Yes, I believe so. 3 Q. 25/26 January 2011, you as the TAC adviser, G1 as -- 4 THE CHAIRMAN: That would be 2012. 5 MR BEER: 2012, I am sorry. 6 You as the TAC adviser, G1 as the OFC and 7 Superintendent Ellison initially as the TFC. 8 A. Yes. 9 Q. 27th, ie the next day, same set up? 10 A. Yes. 11 Q. Yes? 12 30 January, you as the TAC adviser handing over to 13 Y19, G1 still the OFC but Superintendent Hankinson was 14 the TFC? 15 A. Yes. 16 Q. 31 January 2012 and 1 February 2012, you as the TAC 17 adviser, G1 as the OFC, Mr Hankinson as the TFC? 18 A. Yes. 19 Q. 3 February 2012, the same? 20 A. Yes. 21 Q. Then I think the eighth deployment would have been 22 2 March and then the ninth deployment would have been 23 3 March? 24 A. Correct. 25 Q. I just want to ask you a few questions, we are not going</p> <p style="text-align: center;">Page 114</p>	<p>1 Q. Then you set out some more details and go over the page, 2 you say that the SFC was ACC Shewan? 3 A. Yes. 4 Q. Then in the fourth line you say: 5 "All the decisions, the subjects, the working 6 strategies, the threat assessments and the tactical 7 options considered necessary were recorded in a TAC 8 adviser's policy logbook." 9 That is your TAC adviser's policy logbook; is that 10 right? 11 A. That's correct. 12 Q. We have heard evidence from Superintendent Ellison that 13 there was a risk assessment meeting conducted on 14 25 January 2012. And it was jointly between: him, the 15 TFC; the SIO, DI Cousen; you as the TAC adviser; 16 a couple of other officers, DS Johnston from the DSU and 17 a DS Cooke, you may not remember him, he was 18 ACC Sweeney's staff officer who was attending as 19 an observer. 20 A. Okay. 21 Q. Does that ring a bell? 22 A. I vaguely remember that date, yes. 23 Q. Okay. He has told us that he, Superintendent Ellison, 24 caused another officer to be brought into the room 25 because he had some queries in relation to intelligence</p> <p style="text-align: center;">Page 116</p>

<p>1 and DI Cousen went and fetched somebody to add to the 2 briefing. Does that ring a bell?</p> <p>3 A. Vaguely.</p> <p>4 Q. It does. He has told us, Superintendent Ellison this 5 is, and DI Cousen has confirmed it, that the risk 6 assessment meeting started at 2.00 pm and it went on for 7 quite a long time, it was a long and detailed meeting. 8 We have heard evidence from him that he ultimately made 9 the application for the authority to Mr Shewan at 4.50 10 in the afternoon, yes?</p> <p>11 A. Okay. Yes.</p> <p>12 Q. So approaching four hours.</p> <p>13 I just want to look at your log, for that. That 14 I think requires you to take out a folder, G1, 15 page 2647.</p> <p>16 A. Sorry, give me the number again, please?</p> <p>17 THE CHAIRMAN: 2647.</p> <p>18 MR BEER: 2647.</p> <p>19 Whilst you are finding that I think I may have said 20 that the meeting went on four hours, of course 2.00 to 21 4.50 --</p> <p>22 THE CHAIRMAN: Three hours.</p> <p>23 MR BEER: -- would be three hours not four.</p> <p>24 Do you have that, and is that your logbook? (Pause)</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 117</p>	<p>1 A. Yes, there was.</p> <p>2 Q. I just wonder whether we could look, please -- 3 unfortunately this means getting out another folder -- 4 at G1/2319.</p> <p>5 THE CHAIRMAN: It may be in the same -- in mine I think it 6 is the same folder.</p> <p>7 MR BEER: That would be excellent, but it will mean flipping 8 between things.</p> <p>9 THE CHAIRMAN: Yes.</p> <p>10 MR BEER: We can see, I think in fact if you go to 2317, 11 that is where Mr Ellison's book starts.</p> <p>12 A. Yes.</p> <p>13 Q. Yes? Then if you look at 2319 we can see his record of 14 the meeting, yes?</p> <p>15 A. Yes.</p> <p>16 Q. Can you see -- I am going to take this quite shortly 17 because we have heard detailed evidence from 18 Superintendent Ellison already -- at 30.9.11, he has 19 recorded: 20 "Subject David Totton [date of birth and his SRN] 21 subject of Operation Shire, Robbery Unit target ..." 22 Then he writes down two warning signs, "violence" 23 and "weapons". Do you see?</p> <p>24 A. I can.</p> <p>25 Q. If we look in your book against Mr Totton, on 2649, we</p> <p style="text-align: center;">Page 119</p>
<p>1 Q. 2647, is that your logbook?</p> <p>2 A. It is, yes.</p> <p>3 Q. If you just look at the next page, 2649 it will be, is 4 that your writing?</p> <p>5 A. It is.</p> <p>6 Q. Have you had a chance to look at this recently?</p> <p>7 A. Yes. I think I have, yes.</p> <p>8 Q. Right. If you look, you have the time of the risk 9 assessment meeting down on page 2649 as between 12.00 10 and 2.00, can you see that?</p> <p>11 A. I can.</p> <p>12 Q. We have heard evidence and we have seen both of their 13 books, Mr Ellison and Mr Cousen, that the meeting 14 started at 2.00. Do you know why you have got down 15 what, if their evidence and written records are correct, 16 a meeting starting at 2.00, yours is out by two hours?</p> <p>17 A. Yes, I don't know, sir.</p> <p>18 Q. Did you write this book up at the time of the meeting or 19 after the event?</p> <p>20 A. I believe I wrote it at the time.</p> <p>21 Q. Okay, that is one thing I just want to ask you about, 22 which may suggest that it was written up afterwards. 23 I just want to look to see if there are any more. 24 There was an intelligence briefing by DI Cousen; is 25 that right?</p> <p style="text-align: center;">Page 118</p>	<p>1 can see you have written down three warning signs, "FI" 2 meaning firearms and then "weapons" and "violence", do 3 you see?</p> <p>4 A. Yes.</p> <p>5 Q. The three that you have written down, as opposed to the 6 two that Mr Ellison has written down, are the three that 7 ended up on the PowerPoint briefing. Do you understand?</p> <p>8 A. I do.</p> <p>9 Q. Did you take them from the briefing after the event?</p> <p>10 A. Not that I recall, sir.</p> <p>11 Q. Do you know how it is that attending the same briefing 12 as Mr Ellison, you have come away with it believing 13 Mr Totton has a firearms marker and that the 14 superintendent didn't?</p> <p>15 A. I don't know, I don't know why.</p> <p>16 Q. No, okay. 17 If we go down and look in your book, your next 18 subject is Robert Rimmer.</p> <p>19 A. Yes.</p> <p>20 Q. Then the third subject, subject 3, is Anthony Grainger, 21 do you see?</p> <p>22 A. Yes.</p> <p>23 Q. It says: 24 "Anthony Grainger 35 years, warnings ..." 25 You get three of them down, "weapons", "violence"</p> <p style="text-align: center;">Page 120</p>

<p>1 and "Group 1". Yes.</p> <p>2 A. Yes.</p> <p>3 Q. Do you see in Mr Ellison's book there is no mention of</p> <p>4 Anthony Grainger at all?</p> <p>5 A. No.</p> <p>6 Q. On any page.</p> <p>7 Indeed when Mr Ellison came to give evidence to us,</p> <p>8 on oath he told us that he was not briefed about</p> <p>9 Anthony Grainger, because Anthony Grainger did not</p> <p>10 feature at all in the intelligence briefing given by</p> <p>11 DI Cousen and that it was something of a mystery to him</p> <p>12 why there was a briefing on the PowerPoint the next</p> <p>13 morning on 26 January about him.</p> <p>14 How or where did you get information that the third</p> <p>15 subject of the operation was Anthony Grainger?</p> <p>16 A. I can't recall that, sir, I don't know.</p> <p>17 Q. Do you think, again, these exact warnings in this order</p> <p>18 ended up on the PowerPoint the next day on the 26th. Do</p> <p>19 you think you took them from the PowerPoint?</p> <p>20 A. I don't think I did, no.</p> <p>21 Q. Do you think conversely then, it was you that gave the</p> <p>22 author of the PowerPoint the information to complete it?</p> <p>23 A. I may well have done.</p> <p>24 Q. Where would you have got the information from?</p> <p>25 A. I can't recall.</p> <p style="text-align: center;">Page 121</p>	<p>1 to prevent any repetition being written down, I actually</p> <p>2 signed Mr Ellison's book once he completed his notes, in</p> <p>3 agreement with what had been recorded.</p> <p>4 Q. Where did you sign them?</p> <p>5 A. They are further on in Mr Ellison's notes.</p> <p>6 Q. There certainly is a signature at page 2347 against the</p> <p>7 question "Have we got sufficient resources ..."</p> <p>8 A. Yes, that's correct.</p> <p>9 Q. "... to achieve the objective?" Can you see that?</p> <p>10 A. Yes.</p> <p>11 Q. 2347, and that is your signature underneath that black</p> <p>12 box there?</p> <p>13 A. Yes.</p> <p>14 Q. That is signed at 4.00 in the morning on the 26th, not</p> <p>15 a countersignature for intelligence received at 2.00 in</p> <p>16 the afternoon the previous day.</p> <p>17 A. No, that's correct.</p> <p>18 Q. Do you think again the reason why you didn't write the</p> <p>19 intelligence up is that you maybe didn't write your book</p> <p>20 up at the time but instead wrote it up after the event?</p> <p>21 A. It may be so, sir. It may be so.</p> <p>22 Q. Lastly on this point, if we look, please at page 2659 of</p> <p>23 your book.</p> <p>24 A. Yes.</p> <p>25 Q. Having considered four tactical options, which are set</p> <p style="text-align: center;">Page 123</p>
<p>1 Q. We are trying to discover how it was that</p> <p>2 Anthony Grainger first became introduced into briefing</p> <p>3 of firearms officers, because the very first iteration</p> <p>4 of the PowerPoint presentation that we have was this one</p> <p>5 and it stayed the same forever more, right up until the</p> <p>6 day of his death. We are trying to discover how it was</p> <p>7 that the information about these three warnings,</p> <p>8 weapons, violence and Group 1 offenders became part of</p> <p>9 it.</p> <p>10 A. Yes, I understand that, sir.</p> <p>11 Q. You cannot recall?</p> <p>12 A. I can't recall where I got that information from at that</p> <p>13 time.</p> <p>14 Q. Okay.</p> <p>15 The fourth issue then really is if you look at</p> <p>16 Superintendent Ellison's book, you can see that he</p> <p>17 writes down a very considerable volume of intelligence</p> <p>18 over two pages, with gradings for all or nearly all of</p> <p>19 it. Can you see that?</p> <p>20 A. Yes.</p> <p>21 Q. You don't.</p> <p>22 A. No.</p> <p>23 Q. Why is that?</p> <p>24 A. The information I was informed was there was some</p> <p>25 sensitive information involved with this operation. And</p> <p style="text-align: center;">Page 122</p>	<p>1 out on the previous two pages, you sign that the</p> <p>2 preferred tactical option is MASTS, yes?</p> <p>3 A. That's correct.</p> <p>4 Q. That is timed at 6.00 on 26 January, so it is a day and</p> <p>5 a bit later than the meeting with</p> <p>6 Superintendent Ellison, which was between about 2.00 and</p> <p>7 4.55 on 25 January. Do you see?</p> <p>8 A. I do, sir.</p> <p>9 Q. Again, might that suggest that you wrote the book up</p> <p>10 after the event?</p> <p>11 A. That may be the case.</p> <p>12 Q. Was that quite a common practice for TAC advisers to not</p> <p>13 make contemporaneous notes of intelligence that they</p> <p>14 were passed, decisions as to tactical options considered</p> <p>15 and the preferred tactical option selected until well</p> <p>16 after the event?</p> <p>17 A. It sometimes occurred, sir, yes.</p> <p>18 Q. With what frequency did it occur?</p> <p>19 A. Not on a frequent basis.</p> <p>20 Q. What were the reasons for that?</p> <p>21 A. The reasons were usually time bound or in relation to,</p> <p>22 as I have said, the information being recorded by one</p> <p>23 document, sir, that we were not repeating the recording</p> <p>24 of information that didn't need to be written down</p> <p>25 twice.</p> <p style="text-align: center;">Page 124</p>

<p>1 Q. You said that some of the intelligence was sensitive, 2 which I think one line may have been in Mr Ellison's 3 book but a lot of it was marked "A11", which is not that 4 sensitive, is it? 5 A. No, sir, it is not. No. 6 Q. No. 7 What was Superintendent Ellison like as a TFC? 8 A. He was thorough, sir, yes. 9 Q. Was he careful, cautious and methodical? 10 A. I would say so. 11 Q. How many silvers were there in the cadre at this time? 12 A. I don't know. 13 Q. Roughly speaking? 14 A. I would be guessing. 15 Q. Okay, but is it of the order of sort of 5 or 50? 16 A. No more than 20, I would say. 17 Q. No more than 20, okay. 18 Did they each have different approaches to the task? 19 A. Yes. 20 Q. Was he, Superintendent Ellison, fairly typical of the 21 approach that was taken or was he at the careful or 22 perhaps even fussy end of the spectrum? 23 A. I would say he was through. 24 Q. Through? So there were other TFCs that were less 25 through?</p> <p style="text-align: center;">Page 125</p>	<p>1 could do the role. 2 Q. What approach, if any, did you take to how you treated 3 the intelligence that you had been given on briefings 4 one, two and three when you reached deployment four? 5 A. Each deployment was different, so each piece of 6 information and intelligence would have to be taken as 7 it was on that tour of duty. 8 Q. Right. Thank you. 9 I think we can put that file away, thank you, now, 10 J4. 11 Would you effectively try to consciously put out of 12 your mind that which you had been told previously and 13 say, "Let's focus on the briefing I am getting today"? 14 A. Well it would be impossible to remove all the 15 information that you have previously taken on board, of 16 course, but your focus is on what you were being told 17 for that particular tour of duty. 18 Q. In briefings, was it normal -- I am talking here where 19 the SIO is speaking to the TFC and TAC jointly -- to 20 give intelligence gradings? 21 A. On occasions, yes. 22 Q. "On occasions" maybe suggests that it was not the norm? 23 A. No, it was, I would suggest, more the norm than not. 24 Q. Right. Was that for the obvious reason that that was 25 important information for the TFC and the TAC, in</p> <p style="text-align: center;">Page 127</p>
<p>1 A. It would be a difficult measure for me to make on that, 2 yes. 3 Q. Was it usual to have a meeting of this kind maybe 4 lasting three hours or so, which was face to face with 5 the SIO with the DSU and with somebody else from the 6 operation pulled in to give a special briefing. Was 7 that the norm? 8 A. No, they usually didn't last as long as three hours. 9 Q. He has told the chairman, Superintendent Ellison, that 10 he went through the intelligence case with the SIO, 11 Mr Cousen, and then after hearing from Mr Cousen's 12 officer about a specific issue, he then sat down in 13 a quiet period with just you to discuss the tactical 14 options. Was that the usual thing to do, to get the SIO 15 and others out and to have a one to one, TAC adviser to 16 TFC? 17 A. On occasions. 18 Q. You, as we discussed earlier, attended a number of 19 briefings and performed the functions of OFC and TAC 20 adviser on a considerable number of occasions in 21 Op Shire. 22 A. Yes. 23 Q. Was that usual that you would in a long-running 24 operation pop up frequently in it? 25 A. Yes, there was only a specific number of officers who</p> <p style="text-align: center;">Page 126</p>	<p>1 particular the TFC, to have? 2 A. Yes, it was. 3 Q. Because the intelligence was the foundation stone on 4 which the firearms operation would be built? 5 A. It was, yes. 6 Q. Turning to 2 and 3 March 2012 then, please. By those 7 dates, were you aware that Operation Shire had been 8 split into two strands by the SIO? 9 A. I don't recall that being the case, I wasn't aware. 10 Q. If you could take out, please, the general bundle for 11 firearms officers, number 2, and have a look, please, at 12 tab 20. That is very wise. 13 A. Okay. 14 Q. This is a format with which you I think would have been 15 very familiar? 16 A. Yes. 17 Q. If you turn to the second page, 448, we can see that you 18 are listed as due to be present, second from the bottom, 19 left-hand column. 20 A. Yes. 21 Q. If we go to tab 21, the next tab, we can see four lines 22 from the bottom on a transcript of the recording of the 23 briefing that was given on 2 March, you were in fact 24 present because you called your name out. 25 A. Yes.</p> <p style="text-align: center;">Page 128</p>

<p>1 Q. Going back to tab 20, please, and looking at page 449, 2 which is essentially the intelligence case. 3 A. Yes. 4 Q. Can you see the first line: 5 "The subjects of this operation are believed to be 6 engaged in armed robberies in the north-west region." 7 Yes? 8 A. Yes. 9 Q. What would you understand the reference to "the 10 subjects" to mean? Would it mean the three people that 11 you were then going to be briefed about? 12 A. Yes. 13 Q. The phrase "engaged in armed robberies", what did you 14 understand that to mean? 15 A. That suggested that they were in the -- in either the 16 preparation phase or in actually executing robberies in 17 the areas that we were interested in. 18 Q. I am interested in particular in the phrase "armed", 19 what would you have drawn from that as to what they 20 would be armed with? 21 A. Okay, "armed" would cover all sorts of arms, so 22 firearms, it could be blunt instruments, ie machetes, 23 axes, and the like. 24 Q. "Armed" doesn't necessarily mean to you firearms? 25 A. No.</p> <p style="text-align: center;">Page 129</p>	<p>1 are engaged in armed robberies in the north-west 2 region"? 3 A. Where it says "are believed", which suggests that they 4 were believed to be but it is not a firm committal to 5 the fact that they are engaged. It is believed. 6 Q. Okay, so you wouldn't work on the basis that it was 7 an established fact that they are engaged? 8 A. If it was an established fact we would conduct arrests 9 on these individuals, because there should be sufficient 10 evidence to do so. 11 Q. Yes. 12 The second paragraph, please, "There is intelligence 13 to suggest that these subjects ..." 14 Again "these subjects", you would understand that to 15 be a reference to the three that followed? 16 A. Yes. 17 Q. "... were responsible for a robbery in 2008 in Preston 18 ..." 19 Then it continues. 20 What would you take from that paragraph? 21 A. That suggest that there was an involvement in relation 22 to a robbery that took place in 2008. 23 Q. Would you understand this to be a reference to 24 a conviction of each of them for that? 25 A. No.</p> <p style="text-align: center;">Page 131</p>
<p>1 Q. Okay. 2 Similarly, if you flip over a page to 450, the 3 intent of Mr Totton and similarly with Mr Rimmer and 4 Mr Grainger, was said to be conspiring to commit armed 5 robbery. Similar there that "armed robbery" didn't 6 necessarily include and only include firearms? 7 A. No. 8 Q. The paragraph at the top of 449 doesn't itself contain 9 a grading of the intelligence. 10 A. No. 11 Q. You have told us that it was the norm when the SIO 12 briefed the TFC and the TAC for such grading to be 13 provided. Was it also the norm for grading to be 14 provided when the officers, the AFOs themselves, were 15 briefed? 16 A. No. Not always. 17 Q. Do you know why that was? 18 A. I feel that the information and intelligence was just to 19 give an overview of the current situation in relation to 20 what was happening, the actual complexities of gradings, 21 really, would not be of any major significance to the 22 firearms officers as a team. 23 Q. Okay, how were they intended to treat, for example, that 24 top paragraph? Were they to treat it as, "We should 25 work on the basis that this is fact, that these subjects</p> <p style="text-align: center;">Page 130</p>	<p>1 Q. Is that because it begins, "There is intelligence to 2 suggest ..."? 3 A. Yes, and if there was a conviction, it would have said 4 there had been an arrest and conviction for ... 5 Q. Does that apply generally to the briefing, that if there 6 has been a conviction, you would expect to be told to be 7 it? 8 A. It should be there. 9 Q. Yes. We can see one example of that on page 451. In 10 the warnings for Mr Rimmer, under weapons, "Subject has 11 served five and a half years for section 18 assault". 12 A. That's correct. 13 Q. Given that, would you treat the balance of the 14 information in this presentation as non-conviction 15 information, so it is intelligence? 16 A. It is intelligence, yes. 17 Q. One last question on this, if you go to 452, please -- 18 A. Yes. 19 Q. -- and look at Mr Grainger's warnings. The last one of 20 those is that he is a Group 1 offender, what was your 21 understanding then of what a Group 1 offender was? 22 A. It is limited, my understanding of Group 1 offenders. 23 But it is a grading system that is used by the police to 24 identify certain individuals, subjects, who have 25 criminal elements to them. There is usually elements</p> <p style="text-align: center;">Page 132</p>

1 **which involve working as a group, as an organised crime**
 2 **group, and the type of activities that they get involved**
 3 **in in relation to that.**
 4 Q. It is fair to say that you didn't have a precise
 5 understanding of what a Group 1 offender was?
 6 **A. No, no. No.**
 7 Q. Do you think that would be common amongst officers,
 8 AFOs?
 9 **A. Long-served AFOs, yes.**
 10 Q. You mean long-served AFOs because they might not be
 11 complete au fait with new technology?
 12 **A. Correct.**
 13 Q. If we look, please, at the record of the briefing itself
 14 over the tab to tab 21, please. Can we see at 1176, so
 15 tab 21, page 1176, Mr Lawler, who was the briefing
 16 officer here, said at the foot of the page:
 17 "Before we go into the threat assessment we all need
 18 to be aware there is no current information or
 19 intelligence to say the subjects have either possession
 20 or immediate access to firearms or less lethal weapons.
 21 However my assumption is they are about to commit armed
 22 robbery, based on their previous criminal behaviour.
 23 They will either have firearms or less lethal weapons.
 24 So you are all highly trained in judgment again to deal
 25 with threat that we may face at the time we go to

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1 intercept them."
 2 Yes?
 3 **A. Yes.**
 4 Q. Would you regard this as important information that you
 5 were being given here, because it related to subjects
 6 and firearms?
 7 **A. Yes, it is.**
 8 Q. What would you understand the message being given to you
 9 there is?
 10 **A. The information there is saying that at this time, of**
 11 **the briefing that is, there was no intelligence to**
 12 **suggest that they were in possession of any weaponry at**
 13 **that time. However, the overarching issue is that their**
 14 **plan is believed to be that of committing armed**
 15 **robberies.**
 16 Q. I think importantly, as Mr Lawler said, based on their
 17 criminal behaviour, they will have access to firearms?
 18 **A. That is what it says, yes.**
 19 Q. Yes.
 20 Would that be, perhaps amongst all of the
 21 information that you are given as a firearms officer,
 22 the most important information, the assessment to which
 23 the subjects are likely to have guns?
 24 **A. Yes, it is. Up to date and current information.**
 25 Q. Yes.

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1 The next day, on the 3rd, when Mr Granby and X7 came
 2 to brief you, there was no equivalent briefing on that
 3 issue, on whether or not there was current intelligence
 4 that the subjects had firearms or an evaluation or
 5 judgment call based on their intention plus their
 6 previous behaviour, alleged behaviour, that they would
 7 have firearms. Is that something you noticed at the
 8 time?
 9 **A. I didn't notice it at the time. As I am stood here**
 10 **today, I didn't notice it, no.**
 11 Q. No, okay.
 12 Standing here today, can you recall whether there
 13 was any difference in the tactical plan? By that
 14 I don't mean whether MASTS with special munitions was
 15 the option, but the detailed tactical plan as between
 16 2 March and 3 March?
 17 **A. Not that I can recall, no.**
 18 Q. I just want to ask you a couple of questions about that
 19 then. If you go to 1179 in the document we are at.
 20 I think it is X7 speaking now. In the big box, second
 21 paragraph, about six or seven lines in, he says:
 22 "The reason we are at Leigh police station is
 23 obviously to intercept the subjects prior to them
 24 getting to Culcheth."
 25 Can you see that?

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1 **A. Yes, I can.**
 2 Q. Then over the page to 1180, in the second paragraph on
 3 the page, he says:
 4 "While we are on the subject, our intention is to
 5 conduct an interception prior to any offences taking
 6 place which is before we get to Culcheth."
 7 Yes?
 8 **A. Yes.**
 9 Q. Those two things, which is essentially a repetition,
 10 would I think suggest to you that the plan was to
 11 prevent the subjects from ever getting to Culcheth in
 12 a car?
 13 **A. If possible, yes.**
 14 Q. Yes.
 15 Would that as an experienced AFO, OFC and TAC
 16 adviser, lead you to believe that the plan was to
 17 conduct a vehicle stop?
 18 **A. Or intercept the team in whatever form we could, yes.**
 19 Q. What do you mean "or intercept the team in whatever form
 20 you could"?
 21 **A. If they were on foot but we knew that they were going to**
 22 **make their way towards Culcheth then --**
 23 Q. As they were walking there?
 24 **A. Yes, we would be able to deal with them in another way.**
 25 Q. Right.

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<p>1 A. But yes, I agree, we would use the MASTS platform to achieve our objective.</p> <p>2</p> <p>3 Q. As between the probabilities of them walking there,</p> <p>4 I think you had been briefed up that they had possession</p> <p>5 of a stolen Audi that they had used on previous</p> <p>6 occasions to drive from Boothtown to Culcheth to conduct</p> <p>7 recess, yes, that was the allegation?</p> <p>8 A. Yes, that's correct, yes.</p> <p>9 Q. And it was assessed that they were going to use that</p> <p>10 vehicle to travel to Culcheth again?</p> <p>11 A. Yes.</p> <p>12 Q. There was again no equivalent briefing the following</p> <p>13 day, on the 3rd, ie what the primary or overarching plan</p> <p>14 was as to if an interception or interdiction was to</p> <p>15 occur, when it was to occur. Was that something that</p> <p>16 struck you at the time or can you not remember now?</p> <p>17 A. No, I can't remember that causing me any concern.</p> <p>18 Q. That assumes that you noticed it?</p> <p>19 A. No, I didn't notice it.</p> <p>20 Q. You didn't notice it, okay.</p> <p>21 A. No.</p> <p>22 Q. Can you recall now what the plan was therefore on the</p> <p>23 3rd? We have seen that from these two elements here it</p> <p>24 appears that the plan was to stop them, probably in</p> <p>25 a vehicle, from getting to Culcheth.</p> <p style="text-align: center;">Page 137</p>	<p>1 A. That's correct, yes.</p> <p>2 Q. Whose idea was it to produce the flip chart?</p> <p>3 A. I think we had a discussion with our legal</p> <p>4 representation.</p> <p>5 Q. Who is the we?</p> <p>6 A. I certainly had discussion with Mr Holroyd, who was our</p> <p>7 legal representation.</p> <p>8 Q. I don't want to trespass on the nature of your</p> <p>9 discussions between you and Mr Holroyd, is that</p> <p>10 Nick Holroyd from Russell, Jones & Walker?</p> <p>11 A. Yes, I believe so, yes.</p> <p>12 Q. You are saying that as a result of your discussion with</p> <p>13 him you produced a visual aid; is that right?</p> <p>14 A. That's correct.</p> <p>15 Q. Did you discuss the idea of a visual aid with anyone</p> <p>16 other than Mr Holroyd?</p> <p>17 A. I probably discussed it with the officers who were with</p> <p>18 me at the time to make our statements.</p> <p>19 Q. Yes, that is putting it into effect. I'm talking about</p> <p>20 the plan to do it, getting --</p> <p>21 A. I can't recall whether -- I remember probably a phone</p> <p>22 call conversation with Mr Holroyd.</p> <p>23 Q. If you look, there will be on your left-hand side, on</p> <p>24 the judge's bench, three sheets of paper which are --</p> <p>25 that is it, thank you, if you take hold of those. They</p> <p style="text-align: center;">Page 139</p>
<p>1 What was the equivalent plan the next day?</p> <p>2 A. It was the same as the day before, as far as I was</p> <p>3 concerned.</p> <p>4 Q. Right.</p> <p>5 Can we turn then, to 3 March, and before we look at</p> <p>6 3 March, I just want to see how your account of it came</p> <p>7 to be created.</p> <p>8 I think the first account -- we can put that bundle</p> <p>9 away by the way.</p> <p>10 A. Okay.</p> <p>11 Q. The first account that you gave was on 9 March 2012; is</p> <p>12 that right?</p> <p>13 A. It was, yes.</p> <p>14 Q. That is tab 1 in your own file there, we can see your</p> <p>15 witness statement of 9 March.</p> <p>16 A. Yes.</p> <p>17 Q. If you go to the last paragraph of that statement,</p> <p>18 please, you say:</p> <p>19 "I made this statement at Nexus House commencing at</p> <p>20 1.15 in the presence of my colleagues. During the</p> <p>21 making of my statement I from time to time clarified</p> <p>22 with my colleagues matters relating to times, vehicles,</p> <p>23 locations and suspect details. I also produced a flip</p> <p>24 chart visual aid to assist with these details for</p> <p>25 officers to refer to."</p> <p style="text-align: center;">Page 138</p>	<p>1 should go in order of "TOD" first, "Red Audi" second,</p> <p>2 "I made this statement" third. They are photocopies of</p> <p>3 a photograph of the A1 sheet. Is that your writing on</p> <p>4 there?</p> <p>5 A. It is, yes, apart from the Raven Inn, Warrington Road.</p> <p>6 Q. The times "5.37 to 6.15" crossed out, is that the bit</p> <p>7 that says "5.37 to 6.15", is that your writing?</p> <p>8 A. The "05.37 to 06.15" does not appear to be, I would</p> <p>9 suggest that approximately the 06.00 above it is mine.</p> <p>10 Q. What about the "TOD 0430, 77 of 12, weapons issue", that</p> <p>11 not either, is it?</p> <p>12 A. That looks like my writing. It is actually written</p> <p>13 over.</p> <p>14 Q. Okay, from where did you get the times?</p> <p>15 A. I believe I got the times from -- we drew them from the</p> <p>16 TAC ad log, the TFC log and the operational briefing</p> <p>17 sheets.</p> <p>18 Q. You said that "we drew them", who is the "we" in that</p> <p>19 sentence?</p> <p>20 A. Well I wrote them, so I believe it must have been me.</p> <p>21 Q. Right. What was the purpose in doing so, in providing</p> <p>22 other officers the information on these three sheets?</p> <p>23 A. Yes, we identified that we were going to have to confer</p> <p>24 on certain matters of fact, of points of fact, ie --</p> <p>25 Q. Again, who is the "we" there?</p> <p style="text-align: center;">Page 140</p>

1 **A. Myself, Mr Holroyd and the other officers.**
 2 Q. Why did you agree that you had to confer on certain
 3 matters?
 4 **A. Well, this was six days after the event had taken place.**
 5 Q. Why was it six days after the event?
 6 **A. Because firstly, in relation to taking a statement after**
 7 **a major event, as such has happened on the 3rd, the**
 8 **advice is that we give ourselves time to process the**
 9 **information through the mind.**
 10 Q. Yes, exactly. I think the manual of guidance suggests
 11 a period of 48 hours of cooling off, effectively?
 12 **A. It says, yes, "at least 48 hours" it refers to, of which**
 13 **we did. And in fact, we went to 72 hours, some time**
 14 **after that period of time officers were coming to me and**
 15 **saying, "I need to get this information down".**
 16 Q. You said "We went to 72 hours. What do you mean we went
 17 to it?
 18 **A. I am saying that we continued without making any**
 19 **statements.**
 20 Q. For three days?
 21 **A. For three days.**
 22 Q. Yes and then officers were coming to you, is that --
 23 **A. They were, yes, I can't give you a specific time when**
 24 **they did but it was some time after the event.**
 25 Q. Coming to you saying we want to write something down?

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1 **A. Yes, and I can't recall who but I do remember**
 2 **a discussion in the office saying, "We need to start**
 3 **recording our statements".**
 4 Q. What happened then when these officers were coming to
 5 you?
 6 **A. From recollection, it was passed up the management line**
 7 **and we awaited instructions.**
 8 Q. Passed up by who and to whom?
 9 **A. I am assuming that I have spoken to line managers, to**
 10 **see whether we can make arrangements to take statements.**
 11 Q. Were you at the centre or forefront of this because you
 12 were long serving?
 13 **A. I was a supervisor, so I had responsibilities.**
 14 Q. Each of these people were part of a team on this
 15 occasion, weren't they?
 16 **A. They were.**
 17 Q. What was the team number?
 18 **A. Team number?**
 19 Q. Yes. The AFOs, were they part of a standing team?
 20 **A. They were part of the operations team.**
 21 Q. Right. Was that split or subdivided in any way?
 22 **A. We had two teams at that point.**
 23 Q. Were these people, on the 3rd, part of one of those two
 24 teams or were they a mixture?
 25 **A. They were a mixture.**

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1 Q. Right, okay.
 2 So you were not the team supervisor for one of those
 3 two teams, it was just that you were a supervisor on the
 4 day?
 5 **A. I was a team supervisor for one of those teams.**
 6 Q. Oh you were, okay.
 7 **A. I was.**
 8 Q. Can you remember who you spoke to?
 9 **A. I can't, no.**
 10 Q. You said that officers were wanting to make a statement,
 11 and presumably you were too?
 12 **A. Yes.**
 13 Q. What was the message that came back?
 14 **A. We didn't have a message that came back.**
 15 Q. Why didn't you make a statement?
 16 **A. Because we were in a process of a post-incident**
 17 **procedure and we didn't want to take our own executive**
 18 **action without guidance.**
 19 Q. How was it then that you came to make a statement on
 20 Friday, 9 March?
 21 **A. That was arranged.**
 22 Q. But who arranged it?
 23 **A. It was arranged above me, I don't know who.**
 24 Q. Who gave you the message to turn up for 1.15 at
 25 Nexus House?

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1 **A. I can't recall that.**
 2 Q. You cannot help us with who gave the green light to
 3 making a statement?
 4 **A. No, there are many people involved in the post-incident**
 5 **procedure. I can't recall who gave us that information.**
 6 Q. You told us that you got the times from the TAC
 7 adviser's log; is that right?
 8 **A. That's correct.**
 9 Q. The TFC log and the briefing?
 10 **A. Yes.**
 11 Q. The briefing, the PowerPoint, I don't think had times on
 12 it --
 13 **A. No.**
 14 Q. -- but it had some other information, are you thinking
 15 in particular of the incorrect registration number of
 16 the Audi?
 17 **A. That's correct, yes.**
 18 Q. Why did you think it was appropriate to take times from
 19 the TAC adviser's log and the OFC's log and supply those
 20 to other officers when they were supposed to be writing
 21 their account of the times at which things happened?
 22 **A. I think the intention was to provide points of fact,**
 23 **which we already knew were recorded, and be as accurate**
 24 **as possible to assist the investigation.**
 25 Q. I see, so these were essentially known established facts

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<p>1 that nobody could disagree with, because they were 2 written up by those two senior officers? 3 A. That's correct. 4 Q. Therefore you had great confidence in the times, such 5 confidence that it was appropriate to allow officers to 6 use them even though they were unable perhaps to 7 remember them for themselves? 8 A. Yes. 9 Q. Yes. 10 Can we just look at your statement then, please, and 11 hang on to the flip chart. 12 If we look at your statement, please, on page 1. At 13 the foot of the page, it says: 14 "At approximately 18.45 hours we formed as a team 15 and left Leigh police station, making our way to the 16 Culcheth area." 17 Yes? 18 A. Yes. 19 Q. If you look at the flip chart it says, "18.15, leave 20 Leigh police station". 21 A. Yes. 22 Q. If you had confidence in the times on the TAC adviser's 23 or TFC's log, and such confidence that it was 24 appropriate to tell your more junior colleagues to use 25 those times, why didn't you use them for yourself?</p> <p style="text-align: center;">Page 145</p>	<p>1 have used -- 2 A. Again, I have no explanation for that. 3 Q. Can you try once more to think about it? 4 A. Yes, and it is the same answer. 5 Q. Was it because you knew that it may not be appropriate 6 to write a statement by reference to a script in which 7 everyone had said 19.12 hours and you therefore, being 8 slightly longer in the tooth, hedged your bets a bit and 9 said that it was approximately 19.10 hours? 10 A. Yes, it does say approximately 19.10. 11 Q. What about the other part of the question? 12 A. Repeat that, please? 13 Q. Yes. You knew that if you had said 19.12 hours, 14 a barrister such as myself may end up asking you in due 15 course, "Where did you get 19.12 hours from?" 16 Yes? 17 A. Yes. 18 Q. Therefore being perhaps a bit more streetwise, you 19 hedged your bets and said, "It was at approximately 20 19.10 hours". 21 A. Hedging bets was not the intention. 22 Q. Why is it there then? 23 A. Again, like I said, I can't explain that. 24 Q. Can we turn then to the events of the day. 25 You attended the lay up point at Leigh police</p> <p style="text-align: center;">Page 147</p>
<p>1 A. I don't know, sir. 2 Q. In fact your time of 1845 hours is very likely, on the 3 information we have, to be about accurate. 4 A. Okay. 5 Q. Where did you get that time from? 6 A. I don't know, sir. 7 Q. Again, why didn't you use the time that you were telling 8 others to use. 9 A. But it was there as an aide-memoire, as opposed to me 10 telling other to use it. 11 Q. But it is an half an hour difference? 12 A. It is. 13 Q. Why didn't you use the times you were providing for 14 others? 15 A. I don't know, sir. 16 Q. Over the page in your witness statement, please. Four 17 lines in from the top: 18 "On approach to the car park at approximately 19 19.10 hours we were informed that we were at State Red 20 by officer X7." 21 If you look at the flip chart, what you have written 22 up is that at 19.12 hours State Red was called? 23 A. Yes. 24 Q. Why didn't you use the information that you were giving 25 to other officers, a very considerable number of whom</p> <p style="text-align: center;">Page 146</p>	<p>1 station shortly after the briefing and remained there, 2 according to the flip chart, until about 6.15, according 3 to your statement at about 6.45. A period on any view 4 of about 12 hours, yes? 5 A. Yes. 6 Q. What did you do in that time, please? 7 A. Whilst at Leigh police station? 8 Q. Yes. 9 A. That was mainly rest period. 10 Q. You say in your witness statement, I think, that you 11 received some updates -- yes, page 1, at the foot of the 12 first paragraph: 13 "During this period we were kept up to date with the 14 activities of the subjects via officer X7." 15 A. That's correct, yes. 16 Q. Can you remember what you were told now about the 17 subjects' activities? 18 A. I can't, no. 19 Q. Can you recall whether you received any additional 20 intelligence that suggested that the subjects were or 21 might be armed? 22 A. No. 23 Q. Anything received by you to indicate that the subjects 24 in fact intended to carry out a robbery, ie by way of 25 intelligence update?</p> <p style="text-align: center;">Page 148</p>

<p>1 A. Not that I recall, no.</p> <p>2 Q. Were you told that from about 5.30 pm the command team</p> <p>3 knew that Robert Rimmer would not be in the Audi?</p> <p>4 A. I can't recall that.</p> <p>5 Q. Would you have wanted to know that if that was the</p> <p>6 position, that one the three men that you had been</p> <p>7 briefed about was not going to be in the car?</p> <p>8 A. Yes, I would.</p> <p>9 Q. Equally, if they knew that there was a third male in the</p> <p>10 car, you would want to know about that, and as much</p> <p>11 about him as possible?</p> <p>12 A. Yes.</p> <p>13 Q. You would want to know that there would be a third male</p> <p>14 in the car, even if he was an unknown third male?</p> <p>15 A. Yes, of course.</p> <p>16 Q. We have heard some evidence that it was usual that, post</p> <p>17 deployment, officers would conduct rehearsals in MASTS</p> <p>18 operations in particular, where a walk through would be</p> <p>19 undertaken, issues raised and discussed and reviewed and</p> <p>20 perhaps there would be some critical input from</p> <p>21 commanders and maybe even firearms instructors.</p> <p>22 A. That's correct.</p> <p>23 Q. Would that normally happen at Openshaw before you left?</p> <p>24 A. It normally would.</p> <p>25 Q. Because of the area available and the privacy afforded?</p> <p style="text-align: center;">Page 149</p>	<p>1 THE CHAIRMAN: Yes. Yes, we have been going just over</p> <p>2 an hour. We will stop until -- five minutes.</p> <p>3 MR BEER: Thank you, sir.</p> <p>4 THE CHAIRMAN: Hang on a second while Mrs Shaw comes round</p> <p>5 and we will take a short break.</p> <p>6 (3.25 pm)</p> <p>7 (A short adjournment)</p> <p>8 (3.40 pm)</p> <p>9 THE CHAIRMAN: Yes.</p> <p>10 MR BEER: Thank you, sir.</p> <p>11 J4, we were dealing with the point at 6.45 pm when</p> <p>12 you left the lay up point at Leigh police station.</p> <p>13 You say in your statement that:</p> <p>14 "Information that I had knowledge of stated that the</p> <p>15 Audi had entered Culcheth and parked in the far corner</p> <p>16 of a car park off Jackson Avenue."</p> <p>17 Was that through a main set in the car --</p> <p>18 A. Yes.</p> <p>19 Q. -- broadcasting what the DSU were observing?</p> <p>20 A. Yes. I believe that is correct, yes.</p> <p>21 Q. We have heard evidence from a DSU officer that also</p> <p>22 broadcast was the position of the car in the car park.</p> <p>23 You have got down far corner which was obviously</p> <p>24 correct, but also that it was facing out, ie it had</p> <p>25 backed in with nose out. Can you remember being told</p> <p style="text-align: center;">Page 151</p>
<p>1 A. Yes, and time allowing.</p> <p>2 Q. Do you know why that was not done here?</p> <p>3 A. I don't actually, no.</p> <p>4 Q. Assume, and I am not suggesting that there was time, but</p> <p>5 assume that there was time. In any given operation,</p> <p>6 would it be very usual to do that kind of walk through?</p> <p>7 A. Yes, if time allowed, yes, it would be done.</p> <p>8 Q. If you reached Leigh police station was the opportunity</p> <p>9 to do it there or because of the geography of Leigh</p> <p>10 police station, that would not be possible?</p> <p>11 A. Yes, Leigh police station is very open, so public view</p> <p>12 into that police station yard is quite open. So not</p> <p>13 appropriate for that.</p> <p>14 Q. In the course of the day that you spent at Leigh police</p> <p>15 station, did you hear Q9 discussing what he thought he</p> <p>16 knew about the subjects' previous involvement in</p> <p>17 offences?</p> <p>18 A. No.</p> <p>19 Q. Did you hear X7 challenge or seek to put X9 right on</p> <p>20 some information that he was alleging or suggesting?</p> <p>21 A. No, I didn't hear.</p> <p>22 Q. There came a time when you moved off from Leigh police</p> <p>23 station, and I am at page 1 of your witness statement</p> <p>24 now, at the second paragraph on the first page ...</p> <p>25 In fact, sir, that might be an appropriate moment.</p> <p style="text-align: center;">Page 150</p>	<p>1 that?</p> <p>2 A. I can't remember that.</p> <p>3 Q. That was obviously the position it was in when you came</p> <p>4 to go on to the car park?</p> <p>5 A. It was, yes.</p> <p>6 Q. But you cannot remember whether or not you were told</p> <p>7 that at the time?</p> <p>8 A. Not at the time, from memory, no.</p> <p>9 Q. After you left Leigh police station at 6.45, where did</p> <p>10 you drive?</p> <p>11 A. We drove -- I believe we drove towards Leigh.</p> <p>12 Q. And then where?</p> <p>13 A. And then at some point we stopped at the public house.</p> <p>14 Q. The Raven Inn?</p> <p>15 A. The Raven Inn, yes.</p> <p>16 Q. That is on the flip chart, as I think you still have in</p> <p>17 front of you there --</p> <p>18 A. Yes.</p> <p>19 Q. -- but is not in your statement. Any reason for not</p> <p>20 including that?</p> <p>21 A. No, there is no reason.</p> <p>22 Q. Can you remember how long roughly you remained at the</p> <p>23 Raven Inn on Warrington Road?</p> <p>24 A. It wasn't a long period of time. Minutes.</p> <p>25 Q. You go on to say that at 7.08 you were put on State</p> <p style="text-align: center;">Page 152</p>

1 Amber, and approximately 7.10 State Red. In the time
 2 between about 6.45 and 7.10, so about 25 minutes, can
 3 you recall any updates that you received from the
 4 surveillance officers?
 5 **A. There was information from the surveillance about**
 6 **maintaining observations on the vehicle.**
 7 Q. More particularly: information that they had not
 8 maintained observations on the vehicle. Is that right?
 9 **A. Yes, I believe they were having difficulties.**
 10 Q. If the car was parked up from about 6.45, State Red was
 11 25 minutes later on your account, yes?
 12 **A. Yes.**
 13 Q. Can you remember when in that 25-minute or so period it
 14 was said that there had been a loss of surveillance on
 15 the subject vehicle?
 16 **A. No, I can't remember the exact time.**
 17 Q. Can you remember for how long that loss lasted?
 18 **A. Approximately 10 minutes or so, maybe.**
 19 Q. Can you remember that that was a matter of concern, both
 20 to the surveillance team and its supervisor and to the
 21 firearms supervisors?
 22 **A. It was a concern, yes.**
 23 Q. Why was it a concern?
 24 **A. Because there was no control over the subjects at that**
 25 **time.**

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1 Q. What do you mean by that, "No control over them"?
 2 **A. No visual, what they call, eyes on the subjects.**
 3 Q. Why was it a concern that you had lost eyes on?
 4 **A. Because they were parked in Culcheth and there was**
 5 **an expectation that something may happen in Culcheth at**
 6 **that time.**
 7 Q. Did there come a time when you were given information
 8 that subjects were within the vehicle?
 9 **A. Sorry, say that again, please?**
 10 Q. Did there come time that you were told that there were
 11 now subjects in the vehicle, that were seen?
 12 **A. Yes, I think we did get told that.**
 13 Q. Can you remember what you were told about the subjects,
 14 ie whether they were identified as your three subjects,
 15 the ones that you had been briefed about, or not?
 16 **A. I can't remember that.**
 17 Q. Can you remember whether there was any information about
 18 the identity of those that were in the vehicle that was
 19 broadcast to you?
 20 **A. Not that I recall.**
 21 Q. In the 25 or so minutes that the car was parked up in
 22 this position in the car park, was there any discussion
 23 that you heard from X7 to either the bravo or the
 24 charlie car as to the approach that may be taken if
 25 a strike was to be called on the car in that position?

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1 **A. There may have been discussion, I can't recall exactly**
 2 **what that was.**
 3 Q. Which position were you -- you were in the charlie car?
 4 **A. Charlie 1.**
 5 Q. Which seat were you in?
 6 **A. The front passenger seat of the charlie vehicle.**
 7 Q. Did you have a designated role therefore?
 8 **A. My role was to support the strike.**
 9 Q. What does that mean?
 10 **A. That means that when we move on to the vehicle, fill the**
 11 **next position which is the next priority or threat.**
 12 Q. We have heard the phrase that you are "to fill in" or
 13 "to find work to do", does that describe what you were
 14 doing?
 15 **A. Yes, that is a phrase that is used.**
 16 Q. Was there a discussion within the charlie car as to the
 17 roles that each of you would discharge if and when the
 18 strike came to be called?
 19 **A. No.**
 20 Q. By the time that the strike did come to be called, at
 21 that time had you heard anything from X7 concerning the
 22 role that the alpha car occupants would perform?
 23 **A. Not that I can recall.**
 24 Q. Equally, by that time, any broadcast by X7 as to the
 25 role that the bravo car's occupants would perform?

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1 **A. No.**
 2 Q. Specifically I am interested in whether there was
 3 a common understanding or agreement as to which officers
 4 would offer cover from within the vehicles and which
 5 officers would deploy on foot from the vehicles?
 6 **A. No. I didn't hear anything.**
 7 Q. At the time that you came to deploy, did you know that
 8 officer Q9 had decided himself to sit in the back seat
 9 of the alpha car on one knee with the window down?
 10 **A. I didn't know that.**
 11 Q. Where was your vehicle when you went to State Amber; can
 12 you remember?
 13 **A. Yes, it was the third vehicle of four.**
 14 Q. That is it in relation to the other vehicles --
 15 **A. Yes.**
 16 Q. -- but where in relation to the world?
 17 **A. In State Amber or State Red?**
 18 Q. Amber.
 19 **A. State Amber, we were still moving towards the subject**
 20 **car park -- the car park where the subject vehicle was.**
 21 Q. Can you remember where that was, which road it was when
 22 Amber was called?
 23 **A. I can't, no.**
 24 Q. You approached the car park you say, in the sixth line
 25 of your statement, on page 2 at approximately 7.10. You

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1 were informed that State Red had been called by X7, yes?
 2 **A. Yes.**
 3 Q. In front of you, presumably, were alpha and bravo cars?
 4 **A. Correct.**
 5 Q. You turned in to the car park; is that right?
 6 **A. Yes.**
 7 Q. What were you personally wearing at that time?
 8 **A. I was -- all I had with me on that was my body armour,**
 9 **which is covert, obviously my plainclothes, and I had**
 10 **a respirator with me.**
 11 Q. You subsequently made a witness statement which said
 12 other than the respirator you had, I think, no markings
 13 that would have identified you as a police officer. Is
 14 that right?
 15 **A. That's correct.**
 16 Q. Why was that?
 17 **A. Because -- there are strike jackets. I was not in**
 18 **possession of one, I had never been issued one.**
 19 Q. I think you had access to police caps; is that right?
 20 **A. Yes, we had police caps.**
 21 Q. Is it possible to wear those with respirators?
 22 **A. No.**
 23 Q. Is that why you did not wear that?
 24 **A. My police cap could not fit on when I had my respirator**
 25 **on.**

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1 Q. Did there come a point when you put your respirator on?
 2 **A. Yes.**
 3 Q. Was that after your vehicle had stopped and you were
 4 outside of it?
 5 **A. As I alighted the vehicle.**
 6 Q. Right, okay.
 7 Turning back then to as you were driving across the
 8 car park, you say in your statement that you said to the
 9 driver of your vehicle, H9, "Hold back slightly", to
 10 protect the covert approach of the team. Can you just
 11 explain that a little more?
 12 **A. Yes. There were, at that time, three vehicles going on**
 13 **to the car park at the same time. By all three vehicles**
 14 **snaking, for want of a better term, on to the car park,**
 15 **that would draw attention to our presence there.**
 16 Q. From your position, could you see the alpha vehicle pull
 17 across the front of the red Audi?
 18 **A. Yes.**
 19 Q. Did you see whether it touched it?
 20 **A. No.**
 21 Q. You didn't see whether it touched it or you saw that it
 22 didn't touch it?
 23 **A. I did not see that it didn't touch it.**
 24 Q. You couldn't see whether or not it touched it?
 25 **A. No, I could tell you either yes or no. I couldn't tell**

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1 **whether the vehicle had been touched.**
 2 Q. Thank you.
 3 The bravo vehicle stopped. Did you see whether the
 4 bravo vehicle contacted with the alpha vehicle?
 5 **A. I did not see that.**
 6 Q. Okay. You stopped behind the bravo vehicle; is that
 7 right?
 8 **A. Yes.**
 9 Q. You got out, were you the first person out of the
 10 charlie vehicle?
 11 **A. I could not say, it is usually simultaneous.**
 12 Q. What, with all four or driver --
 13 **A. No, the driver would be last out.**
 14 Q. You say you:
 15 "... alighted from your door and made your way
 16 towards the nearside front passenger window of the
 17 subject vehicle, which was either open or had been
 18 smashed."
 19 If you can take out the general bundle 2, please.
 20 Look at tab 29, please. If you go in a couple of pages
 21 to page 586, can you see a pictorial depiction of the
 22 four vehicles we are concerned with. 586 on the top
 23 right, tab 28.
 24 THE CHAIRMAN: Tab 28?
 25 MR BEER: Did I say 29. I am so sorry, 28.

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1 THE CHAIRMAN: 586?
 2 MR BEER: Yes.
 3 **A. Yes.**
 4 Q. Can you see the four vehicles with which we are
 5 concerned there?
 6 **A. I can, yes.**
 7 Q. Does that approximately describe their positions by the
 8 time that the three police cars had come to
 9 a standstill?
 10 **A. Yes, it does.**
 11 Q. You are in the vehicle on the far right there, or the
 12 bottom of the picture depending how you orientate it?
 13 **A. Yes, light blue vehicle.**
 14 Q. Light blue, coming out of the front left hand passenger
 15 seat?
 16 **A. That's correct.**
 17 Q. Can you describe, by reference to this diagram, how you
 18 got to the position that you have just described, where
 19 you went?
 20 **A. Yes, my best recollection is out of that vehicle and**
 21 **then towards the gap between the alpha and the bravo**
 22 **vehicle.**
 23 Q. The rear of the Audi, police Audi, and the bonnet of the
 24 S-Max?
 25 **A. That's correct, yes.**

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<p>1 Q. Did you walk or run or something in between?</p> <p>2 A. It is like at a medium pace. You need to move in a way</p> <p>3 that you can deal with the scenario in front of you.</p> <p>4 Q. Did you have your weapon in any particular position?</p> <p>5 A. My weapon would have been in the low ready position.</p> <p>6 Q. Just describe to the chairman what "low ready" is?</p> <p>7 A. Low ready is with the barrel of the weapon pointing</p> <p>8 towards the ground, in a position to bring up on aim if</p> <p>9 need be.</p> <p>10 Q. One hand or two hands on the weapon?</p> <p>11 A. Two hands.</p> <p>12 Q. Did you have a TAC light on at this time?</p> <p>13 A. There was one on the weapon, I can't remember if I had</p> <p>14 lighted that or not.</p> <p>15 Q. At that point would you have any sights illuminated or</p> <p>16 not?</p> <p>17 A. Yes, there is sights on it and I would have had those</p> <p>18 sights on.</p> <p>19 Q. You moved at the pace that you have described between</p> <p>20 those two cars, and then where did you go?</p> <p>21 A. I went to the front nearside of the subject vehicle.</p> <p>22 Q. Did you notice anything about the front nearside of the</p> <p>23 Audi?</p> <p>24 A. I recall the window either being open or smashed.</p> <p>25 Q. I think you would be able to tell which of those was the</p> <p style="text-align: center;">Page 161</p>	<p>1 A. It was.</p> <p>2 Q. Was there anyone in the driver's seat?</p> <p>3 A. There was.</p> <p>4 Q. Is that somebody you now know to be Anthony Grainger?</p> <p>5 A. It is.</p> <p>6 Q. What was Mr Grainger doing, if anything?</p> <p>7 A. He wasn't doing anything.</p> <p>8 Q. What position was he in?</p> <p>9 A. To me he appeared to be asleep, his head was down.</p> <p>10 Q. When you say "head was down", do you mean his, the top</p> <p>11 half of his body was moved towards his thighs or that</p> <p>12 his head had rolled down on his neck?</p> <p>13 A. His head had rolled down on his neck. He was still sat</p> <p>14 up.</p> <p>15 Q. Right, he was still sat up but his chin was on his</p> <p>16 chest, yes?</p> <p>17 A. Yes.</p> <p>18 Q. You say in your statement that you shouted, what did you</p> <p>19 shout?</p> <p>20 A. I shouted, "Armed police, show us your hands, show us</p> <p>21 your hands".</p> <p>22 Q. Did he respond to that shout?</p> <p>23 A. No.</p> <p>24 Q. You say in your statement that you were aware that CS</p> <p>25 gas had been deployed into the vehicle. How were you</p> <p style="text-align: center;">Page 163</p>
<p>1 case, wouldn't you?</p> <p>2 A. Yes.</p> <p>3 Q. Which was it?</p> <p>4 A. I believe it was smashed.</p> <p>5 Q. Okay.</p> <p>6 We have some photographs of the results of the</p> <p>7 window having been smashed and it is quite evident that</p> <p>8 there is a very considerable volume of glass.</p> <p>9 A. Okay.</p> <p>10 Q. You think it probably was smashed?</p> <p>11 A. Yes.</p> <p>12 Q. What did you do when you noticed the smashed window?</p> <p>13 A. I looked through the -- into the window and noticed</p> <p>14 there was no front seat passenger, which --</p> <p>15 Q. In your statement you say that you were covering the</p> <p>16 vehicle by pointing my MP5 towards the cabin. What do</p> <p>17 you mean by "covering the vehicle by pointing my MP5</p> <p>18 towards the cabin"?</p> <p>19 A. I brought my weapon up from the south(?) position to</p> <p>20 an on aim position, looking into the vehicle.</p> <p>21 Q. "On aim", does that mean that you had shouldered the</p> <p>22 stock of that the weapon?</p> <p>23 A. It was shouldered, yes, shoulder mounted.</p> <p>24 Q. Yes.</p> <p>25 The front passenger seat was empty, yes?</p> <p style="text-align: center;">Page 162</p>	<p>1 aware of that?</p> <p>2 A. There was CS gas particles in the air.</p> <p>3 Q. Okay, and you pulled down your respirator as a result?</p> <p>4 A. Yes.</p> <p>5 Q. Did you have it on the crown of your head?</p> <p>6 A. It was held up, yes.</p> <p>7 Q. And so you pulled the front of it down so it covered</p> <p>8 your mouth --</p> <p>9 A. Yes.</p> <p>10 Q. -- and nose?</p> <p>11 Did you again challenge Mr Grainger?</p> <p>12 A. I don't think I did.</p> <p>13 Q. Just look at the second paragraph on page 2. You say:</p> <p>14 "I was aware that CS gas had been deployed into the</p> <p>15 vehicle. I pulled down my respirator. I again</p> <p>16 challenged the person in the driver's seat."</p> <p>17 Do you have that, second paragraph, first two lines,</p> <p>18 "I again challenged the person in the driver's seat"?</p> <p>19 A. Yes, I do see that. Yes, so I did.</p> <p>20 Q. You say he didn't respond.</p> <p>21 A. Yes.</p> <p>22 Q. You say the engine was running on the vehicle.</p> <p>23 A. Yes, it was.</p> <p>24 Q. What led you to believe that?</p> <p>25 A. I believe I must have heard it.</p> <p style="text-align: center;">Page 164</p>

<p>1 Q. Could you hear it?</p> <p>2 A. Something told me that that engine was running, I would</p> <p>3 guess -- my best guess is that it was the sound of the</p> <p>4 engine.</p> <p>5 Q. There are a number of things it could be. It could be</p> <p>6 the sound of the engine, it could be that the vehicle</p> <p>7 was moving, it could be smoke from the exhaust.</p> <p>8 A. That vehicle was not moving.</p> <p>9 Q. So it wasn't moving?</p> <p>10 A. No.</p> <p>11 Q. So it is one or more of the other things?</p> <p>12 A. Yes, and I was not at the rear of the vehicle, so ...</p> <p>13 Q. Are you fairly clear that that was so, that the engine</p> <p>14 was on on the vehicle?</p> <p>15 A. I was, yes.</p> <p>16 Q. You say that you went to the driver's side of the</p> <p>17 vehicle to support officers on that side. Again, by</p> <p>18 reference to the diagram, can you say where you went?</p> <p>19 A. Yes, I went, as it says in my statement over the bonnet</p> <p>20 of the subject vehicle.</p> <p>21 Q. If you look, please, at bundle O1, which are the</p> <p>22 photographs, I haven't found the page yet. (Pause)</p> <p>23 Page 395, please.</p> <p>24 It is quite difficult to tell, because it is red ink</p> <p>25 on a red background.</p> <p style="text-align: center;">Page 165</p>	<p>1 heard any bangs or shots?</p> <p>2 A. At that time I was aware of two shots being fired -- it</p> <p>3 says later on in my statement.</p> <p>4 Q. Yes, that is later on. I am talking about the time that</p> <p>5 you go over the bonnet?</p> <p>6 A. Before that, no.</p> <p>7 Q. You hadn't heard the report of a weapon?</p> <p>8 A. No.</p> <p>9 Q. You hadn't heard the sound of the window being broken?</p> <p>10 A. No.</p> <p>11 Q. When you went over the bonnet, did you see a bullet hole</p> <p>12 in the windscreen as you were going past it?</p> <p>13 A. No.</p> <p>14 Q. You didn't notice a bullet hole?</p> <p>15 A. No.</p> <p>16 Q. Did you know at this stage, as you were running across</p> <p>17 the front of the vehicle on the bonnet, past the</p> <p>18 windscreen on your right-hand side, that there was</p> <p>19 a firearms officer, Q9, pointing his weapon at where you</p> <p>20 were running?</p> <p>21 A. No.</p> <p>22 Q. If you had known that, would you have run there?</p> <p>23 A. No.</p> <p>24 Q. Because you would be running across his arc?</p> <p>25 A. His arc, yes.</p> <p style="text-align: center;">Page 167</p>
<p>1 A. Right.</p> <p>2 Q. An easier way to do it might be to start at 379.</p> <p>3 A. 395? It shows a measured area of red.</p> <p>4 Q. Yes, if you just go back to 379 to start with, or 380.</p> <p>5 A. Okay. Yes.</p> <p>6 Q. Can you see what appears to be a footprint at 379 and</p> <p>7 380 on the front of the car?</p> <p>8 A. Yes.</p> <p>9 Q. The later photographs that I showed you I think are</p> <p>10 close ups of that footprint. Do you think that is the</p> <p>11 footprint that you left as you went over the bonnet?</p> <p>12 A. It could be.</p> <p>13 Q. Yes.</p> <p>14 A. Yes.</p> <p>15 Q. Yes.</p> <p>16 If that was you, that can go away now, thank you,</p> <p>17 you ran over the bonnet?</p> <p>18 A. Yes, I stepped over the bonnet, yes.</p> <p>19 Q. Why were you going to the other side of the vehicle?</p> <p>20 A. There were officers there, but the subject was still not</p> <p>21 coming out of the vehicle. So I felt a need to go and</p> <p>22 support that team.</p> <p>23 Q. Did you try and undo the driver's door?</p> <p>24 A. I did.</p> <p>25 Q. By this time, trying to undo the driver's door, had you</p> <p style="text-align: center;">Page 166</p>	<p>1 Q. And that is dangerous?</p> <p>2 A. It is not good practice.</p> <p>3 Q. Because it is dangerous?</p> <p>4 A. Yes.</p> <p>5 Q. You at that time I think less still knew that that</p> <p>6 officer, whose arc you were running through, had already</p> <p>7 fired a shot?</p> <p>8 A. I did not know that.</p> <p>9 Q. No.</p> <p>10 In any event you reached the offside of the Audi and</p> <p>11 opened or attempted to open the driver's door, yes?</p> <p>12 A. Yes.</p> <p>13 Q. You say here that the window was open or broken. Again,</p> <p>14 can you help us, can you remember which of those it was?</p> <p>15 A. I can't, no.</p> <p>16 Q. You say that he was slumped slightly forwards with both</p> <p>17 arms by his side.</p> <p>18 A. Yes.</p> <p>19 Q. Was this different from the position that you had</p> <p>20 indicated a moment ago or the same?</p> <p>21 A. The same.</p> <p>22 Q. You couldn't see his hands and you thought he was</p> <p>23 initially pretending to be asleep?</p> <p>24 A. That's correct.</p> <p>25 Q. You leant through the wind; is that right?</p> <p style="text-align: center;">Page 168</p>

<p>1 A. I did.</p> <p>2 Q. You say you grabbed his left arm, so that would have</p> <p>3 involved you leaning across his body. Is that right?</p> <p>4 A. I did.</p> <p>5 Q. Why did you grab hold of his left arm?</p> <p>6 A. I couldn't see what was in his hands at that time.</p> <p>7 Q. Sorry?</p> <p>8 A. I could not see what was in his hands at that time and</p> <p>9 I needed to see.</p> <p>10 Q. His right hand would have been closer to you?</p> <p>11 A. Yes.</p> <p>12 Q. Just help us, why did you go for the left hand?</p> <p>13 A. Because I could not see that hand.</p> <p>14 Q. I don't think you could see either of them, could you?</p> <p>15 A. Possibly not.</p> <p>16 Q. So help us, why did you go for the one that was furthest</p> <p>17 away from you?</p> <p>18 A. There is no explanation to that. That was the one</p> <p>19 I went to.</p> <p>20 Q. You just did?</p> <p>21 A. Yes.</p> <p>22 Q. You saw that he was wearing a tight black glove and</p> <p>23 another officer tried to, with you, pull Mr Grainger</p> <p>24 through the open window. Is that right?</p> <p>25 A. That's correct.</p> <p style="text-align: center;">Page 169</p>	<p>1 A. It is the first time I realised a shot had been fired.</p> <p>2 Q. Other than the shotgun?</p> <p>3 A. Other than the shotgun, yes.</p> <p>4 Q. You say here:</p> <p>5 "As the male was placed back in the seat prior to</p> <p>6 removal from the vehicle ..."</p> <p>7 Can you just explain what that means?</p> <p>8 A. Yes, we were trying to remove Mr Grainger from the</p> <p>9 vehicle, from the driver's side, that was extremely</p> <p>10 difficult. And the better option was to take him out on</p> <p>11 the nearside, so that was when he was placed back.</p> <p>12 Q. So he was sat back up?</p> <p>13 A. Sat back up.</p> <p>14 Q. You noticed some blood coming from his chest area; is</p> <p>15 that right?</p> <p>16 A. Yes, yes.</p> <p>17 Q. Was that through his clothing or did you see his --</p> <p>18 A. No, his outer jacket fell open.</p> <p>19 Q. And you saw his skin?</p> <p>20 A. I saw a light-coloured T-shirt.</p> <p>21 Q. Did U2 and another officer remove Mr Grainger from the</p> <p>22 nearside front of the vehicle?</p> <p>23 A. U2 and another officer, yes.</p> <p>24 Q. Did you then go to the back of the vehicle and, with G6,</p> <p>25 clear the boot?</p> <p style="text-align: center;">Page 171</p>
<p>1 Q. At that point, were you aware of the sound of two shots?</p> <p>2 A. I was.</p> <p>3 Q. Did you take from the noise that was being created those</p> <p>4 to be shotguns?</p> <p>5 A. The report was a shotgun report, yes.</p> <p>6 Q. Could you tell where it was coming from?</p> <p>7 A. It was from the rear of the vehicle, as far as I was</p> <p>8 aware.</p> <p>9 Q. Rear on your side or rear on the other side?</p> <p>10 A. Not sure.</p> <p>11 Q. Could you see the officer that was discharging the</p> <p>12 shotgun or shotguns?</p> <p>13 A. No.</p> <p>14 Q. Did you try to immobilise the vehicle, ie turn the</p> <p>15 engine off?</p> <p>16 A. I may well have done, but I can't recall doing that.</p> <p>17 Q. I think it is fair to say there is no reference to that</p> <p>18 happening in your statement. Is there?</p> <p>19 A. No, I can't recall doing that.</p> <p>20 Q. U2 appeared on the other side from where you were, and</p> <p>21 encouraged you to pass the male through. Is that right?</p> <p>22 A. That's correct.</p> <p>23 Q. You heard somebody say, "He is shot, he is shot". Was</p> <p>24 that the first time you realised that Mr Grainger had</p> <p>25 been shot?</p> <p style="text-align: center;">Page 170</p>	<p>1 A. I did, yes.</p> <p>2 Q. Was it indeed clear?</p> <p>3 A. It was -- it had numerous tools and objects in, but it</p> <p>4 was clear of individuals.</p> <p>5 Q. Did you then carry on round the back of the car and help</p> <p>6 U2 and G6 with trauma care with Mr Grainger?</p> <p>7 A. Yes, I did.</p> <p>8 Q. Did you collectively remove the top half of his clothing</p> <p>9 which exposed a wound to his chest?</p> <p>10 A. That's correct, yes.</p> <p>11 Q. Did you place a tube in his airway?</p> <p>12 A. Yes, an oropharyngeal was placed in his airway, yes.</p> <p>13 Q. Was oxygen then administered?</p> <p>14 A. It was.</p> <p>15 Q. Did other officers commence chest compressions?</p> <p>16 A. They did.</p> <p>17 Q. Was a search made for an exit wound or other injuries?</p> <p>18 A. Yes, that's correct.</p> <p>19 Q. Then did you pass the your role to another officer?</p> <p>20 A. I did.</p> <p>21 Q. You then say:</p> <p>22 "My role was then to assist the OFC in the initial</p> <p>23 management, preservation and security of the scene."</p> <p>24 At that stage you wanted to find out what had</p> <p>25 happened; is that right?</p> <p style="text-align: center;">Page 172</p>

<p>1 A. Yes.</p> <p>2 Q. And find out which person had shot Mr Grainger; is that</p> <p>3 right?</p> <p>4 A. Yes.</p> <p>5 Q. And did you establish relatively quickly that it was Q9?</p> <p>6 A. I did.</p> <p>7 Q. How did you establish that it was Q9?</p> <p>8 A. I attended our fourth vehicle, where Q9 was sat.</p> <p>9 Q. So he went and sat in the delta car; is that right?</p> <p>10 A. Yes.</p> <p>11 Q. And you went and spoke to him in the delta car?</p> <p>12 A. I went to check on his welfare, yes.</p> <p>13 Q. Yes.</p> <p>14 What if anything did he say to you about what had</p> <p>15 happened?</p> <p>16 A. I can't recall him saying anything, he was in shock.</p> <p>17 Q. Did you ask why he had fired?</p> <p>18 A. No.</p> <p>19 Q. Why not?</p> <p>20 A. That was not the right time to ask that question.</p> <p>21 Q. Did he volunteer why he had fired?</p> <p>22 A. He did not.</p> <p>23 Q. Did you then go to Openshaw and then Claytonbrook?</p> <p>24 A. We did, yes, eventually.</p> <p>25 Q. Did the post-incident procedure then take place?</p> <p style="text-align: center;">Page 173</p>	<p>1 what date we saw Mr Holroyd.</p> <p>2 Q. Did you see Mr Holroyd at some point before the</p> <p>3 statements were given on 9 March?</p> <p>4 A. I think we did, yes.</p> <p>5 Q. Was that again collectively as a group?</p> <p>6 A. I think so, yes.</p> <p>7 Q. That night, on the night of 3 March into the morning of</p> <p>8 the 4th, was there any discussion as to whether or not</p> <p>9 you should provide an initial account?</p> <p>10 A. I don't recall providing an initial account that night.</p> <p>11 Q. That may be so, but was there any discussion over</p> <p>12 whether you should or not?</p> <p>13 A. I don't think there was, no.</p> <p>14 Q. Can you recall why you didn't provide an initial account</p> <p>15 that night?</p> <p>16 A. The initial account wasn't requested of us by the</p> <p>17 post-incident manager.</p> <p>18 Q. Right. If you just turn to tab 4 in your bundle, please</p> <p>19 at the last page of it, page 141, the last paragraph you</p> <p>20 say:</p> <p>21 "From my experience, I can say that all the</p> <p>22 preparations for the operation on 3 March were as</p> <p>23 I would expect from any operation being undertaken by</p> <p>24 the TFU. All aspects of the training, risk assessments,</p> <p>25 briefings and the operational deployment were</p> <p style="text-align: center;">Page 175</p>
<p>1 A. It did.</p> <p>2 Q. In the course of the post-incident procedure, did any</p> <p>3 lawyers attend?</p> <p>4 A. Possibly.</p> <p>5 Q. Can you, within the context of that answer, help us as</p> <p>6 to who they were?</p> <p>7 A. I did not see anyone, solicitor wise, on that night.</p> <p>8 Q. You didn't personally receive advice or seek advice from</p> <p>9 a solicitor that night?</p> <p>10 A. I did not.</p> <p>11 Q. In the following week, did you personally seek advice or</p> <p>12 receive advice from a solicitor?</p> <p>13 A. Yes.</p> <p>14 Q. Was that from Mr Holroyd?</p> <p>15 A. That was Mr Holroyd.</p> <p>16 Q. Can you tell us the circumstances in which that came</p> <p>17 about. I don't want you to tell us what you said to him</p> <p>18 but did you make contact with him?</p> <p>19 A. No, I didn't make contact with him. It would have been</p> <p>20 through the post-incident procedure that he was made</p> <p>21 available to us.</p> <p>22 Q. Was that to you individually or to you as a group?</p> <p>23 A. As a group.</p> <p>24 Q. When did you see Mr Holroyd then in the following week?</p> <p>25 A. I can't be precise on that, I don't know what time or</p> <p style="text-align: center;">Page 174</p>	<p>1 professional and to a standard I would expect of any TFU</p> <p>2 operation."</p> <p>3 Breaking that down.</p> <p>4 Firstly, all aspects of the training were</p> <p>5 professional and were to a standard you would have</p> <p>6 expected. You presumably were not present at the</p> <p>7 training of all of the AFOs?</p> <p>8 A. No.</p> <p>9 Q. So you couldn't say that all aspects of their training</p> <p>10 were professional?</p> <p>11 A. On the basis of not seeing them every single time they</p> <p>12 trained, no, that's correct.</p> <p>13 Q. You were not present at the training that</p> <p>14 Superintendent Granby had undertaken, were you?</p> <p>15 A. I was not, no.</p> <p>16 Q. So you wouldn't have known that within the previous year</p> <p>17 and a half he had I think failed a course or the</p> <p>18 circumstances of his failure?</p> <p>19 A. No, I was not aware of that.</p> <p>20 Q. The same question for X7 and Z15, were you aware that</p> <p>21 they had previously, within the last month, attended</p> <p>22 a CTSFO course in London -- or in the</p> <p>23 Metropolitan Police area?</p> <p>24 A. I was, yes.</p> <p>25 Q. Were you aware that each of them had failed the course?</p> <p style="text-align: center;">Page 176</p>

1 **A. I was, yes.**
 2 Q. Were you aware, firstly of the circumstances or reasons
 3 for Z15's failure?
 4 **A. No.**
 5 Q. You just knew the fact that he had failed?
 6 **A. Yes.**
 7 Q. A similar question in relation to X7. Did you know the
 8 circumstances in which he had failed, the reasons why he
 9 had failed?
 10 **A. No.**
 11 Q. In terms of the second thing you say, that risk
 12 assessments were professional and to a standard that you
 13 would have expected of any TFU operation. Were you
 14 a party to any of the discussions between firstly
 15 DI Cousen and the TFC?
 16 **A. Initially, yes.**
 17 Q. Sorry? No, on this operation on 3 March?
 18 **A. On the 3rd, no.**
 19 Q. Were you a party to any discussion between Mr Granby and
 20 the initial TAC adviser Mr Allen, Steve Allen?
 21 **A. No, I was not.**
 22 Q. Or a party to any discussion he had subsequently with
 23 the second TAC adviser, Y19?
 24 **A. No.**
 25 Q. Were you a party to any of the briefings that Mr Cousen

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1 gave in relation to this deployment to Mr Granby,
 2 Mr Allen, Y19 or that Mr Granby gave to the ACC,
 3 Mr Sweeney?
 4 **A. No.**
 5 Q. Given those things, how were you able to say that all
 6 aspects of training, risk assessment and briefings were
 7 professional and to a standard that you would have
 8 expected?
 9 **A. On the balance of that, I wasn't.**
 10 MR BEER: Thank you very much.
 11 Sir, there is one issue that I would like to look at
 12 over the weekend, if I may. Which means that it may not
 13 be appropriate to release J4 now.
 14 THE CHAIRMAN: No.
 15 MR BEER: It is a matter for others whether they do their
 16 questioning now or subsequently.
 17 MR THOMAS: Sir, can I give an indication that I have no
 18 questions.
 19 MR WEATHERBY: May I give an indication that I have
 20 discussed with Mr Beer this particular issue and it is
 21 a matter that I share with him.
 22 THE CHAIRMAN: Yes.
 23 MR WEATHERBY: So --
 24 THE CHAIRMAN: You certainly don't want to ask anything, if
 25 you were going to, now.

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1 MR WEATHERBY: I would prefer to ask after Mr Beer on
 2 Tuesday.
 3 THE CHAIRMAN: I don't think there is any point in asking
 4 anybody else, because we would be so departing from the
 5 proper order of things that it would not make sense
 6 anyway.
 7 Although it is a little bit early, I think we will
 8 finish.
 9 All right, we will resume again at 10.30 on Tuesday.
 10 We are not sitting on Monday, J4. I am afraid that,
 11 as you have heard and for the reasons you have heard,
 12 I cannot release you at this stage. There will still be
 13 some questioning I have no doubt on Tuesday morning.
 14 Please do not discuss your evidence or this case
 15 with anybody else during the intervening period. Can
 16 you please be back here for 10.30 on Tuesday?
 17 **A. Yes, sir.**
 18 THE CHAIRMAN: Thank you.
 19 (4.19 pm)
 20 (The Inquiry adjourned until 10.30 am on Tuesday,
 21 4 April 2017)
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