Tuesday, 13 June 2017

1 (10.15 am)

MR SKELETON: Superintendent Pollard continues his evidence.

THE CORONER: Yes.

Housekeeping

6 MR MOXON BROWNE: Sir, before Mr Pollard does that, can I just quickly raise a couple of matters that may assist you.

9 THE CORONER: Yes.

10 MR MOXON BROWNE: First of all, having considered the matter over the weekend my clients are now in a position to agree that Dr Panfilova’s evidence about the importance of the word that came before "krysha" that helped us to that understanding, I would also like to say that had it not been for the extraordinary quality of the transcription of that part of the evidence it would have been difficult for us to reach that agreement. It was obviously a very difficult passage and the transcript was extremely helpful to us.

19 THE CORONER: All right, Mr Pollard, you are still bound by the oath or affirmation you took last week to tell the truth. You understand that?

A. Yes, sir.

THE CORONER: Thank you.

Questions from MR MOXON BROWNE

16 MR MOXON BROWNE: Mr Pollard, I think that your evidence that until at any rate 17 November, that is a week after Mr Perepilichny died, you didn’t know and nor did anybody in your force know anything about his potential involvement, but obviously the letter was sent in to Surrey Police dated 17 November.

Q. Yes, well I was going to come to that. The major crime team, under your command, took over either on 28 or 29 November. I think it is right that really nothing much happened between the 17th and 29th and no meaningful investigations were made?

A. That’s correct, sir. And I think my involvement on 28 November resulted from a local MP contacting the Chief Constable of Surrey on 27 November, to inform the Chief Constable that there would be an article about the death and Surrey Police’s response published on 28 November.

Q. That is very fair. I think you are telling us that the action that you were asked to take was prompted principally by the fact that a newspaper story was about to appear?

A. It was prompted following Mr Raab, the MP, contacting Surrey Police, yes.

Page 1

Page 2

Page 3

Page 4

Q. Of course – it is nobody’s fault but the result of that was that when the autopsy, the post mortem, was carried out on 14 November, nobody knew, nobody relevant knew, that Mr Perepilichny might have been a candidate for an unlawful killing?

A. Well the decisions made on the night were based on the information that the officers had on the night, did not deem the death to be suspicious and so in those circumstances it was referred to the coroner for a local post mortem, which took place on 14 November. So in those circumstances, and the information the officers had at the time, there was no suggestion or information about Mr Perepilichny’s status as was then subsequently reported in the letters from Brown Rudnick dated 17 November.

Q. Dr Ratcliffe has subsequently said in response to questions from the senior coroner for Surrey, Mr Travers, that had he known on the 14th what he discovered a few days later, that he would have referred the business of the autopsy to a Home Office pathologist, someone like Dr Fegan-Earl?

A. That’s correct, in those circumstances if information is brought to the attention of a local pathologist and they have concerns then they automatically refer that back to the coroner who would then contact the police to have...
Day 6  Inquest into the death of Alexander Perepilichny  13 June 2017

Q.  And of course that first autopsy was carried out in what standard practice, the fact is that substantially all of the contents of Mr Perepilichny's stomach were disposed of?
A.  That would appear to be the case. There was I think limited stomach contents recovered from the second post mortem on 30 November, but in the main that is correct.

Q.  Of course it is also right that although some standard samples of blood and urine were taken at the first autopsy, it was in no way an autopsy of the kind that Dr Fegan-Earl subsequently and, if I may say so, belatedly carried out.
A.  Well, we could only or the pathologist could only take the samples that were available. We used obviously the samples, the blood and urine from the first post mortem but clearly on the forensic post mortem we took the samples that we needed to take or that the pathologist felt he needed to take in order to assist our subsequent investigations in that matter.

Q.  I think one of your first actions when you took over the investigation on behalf of the major crime team was to set up or cause to be set up what is called a gold group

A.  That is not my decision, that was a decision taken by the assistant chief constable representing Surrey, and they felt it necessary to set up a gold group given the concerns that had been raised and the response of Surrey Police at the time. That is why that gold group was set up; it wasn't at my instigation.

Q.  The reason why I thought it might have been your decision was because you have a policy dealing with that in your policy book. I wonder if you would just look at page 68 of the bundle of documents.
A.  Which section is it, please?

Q.  68.

A.  Yes, but at which tab?

Q.  Well my bundle isn't actually tabbed. You will see numbers at the bottom right-hand corner in red, the work I think of Mr Cohen probably. Tab 2, I am told.

A.  That's correct, yes, I've got it now.

Q.  This policy, we can see from the preceding page, page 67, was adopted on 29 November, so very shortly -- at the outset really of your taking command. And we see who is going to be involved. Finishing "Gold -- ACC Pinkney", that is the assistant commissioner, Ms Olivia Pinkney.

A.  Well it is assistant chief constable and the reason

I document this is to obviously to set out the structure that is in place and the fact that there is in existence a gold group as part of this inquiry, so for no other reason but to document the fact there is a gold group.

Q.  No, I had misunderstood whether or not you had been involved but thank you for explaining that.

Then it says that the justification for the policy is that the structures necessary to ensure accountability et cetera:
"Gold structure necessary for all strategic matters both political and reputational for Surrey Police."

Did you know what the political concern was, is that kind of local politics to do with the police or is it national politics or is it international politics?

A.  Well it was a combination of both really, I think the fact that there was a local MP wrote in, I think that obviously it attracted attention nationally given the concerns raised. So I think that equally applies to the local politics, as well as the national position. So that is my understanding of that, and interpretation of that, and the strategic matters that then fall out of that, along with the reputational issues potentially for Surrey Police.

Q.  And reputational?

A.  Well, yes, reputational in terms of the criticism around

the response or lack of response as was perceived from the letters that were written in by Brown Rudnick, so clearly potentially some reputational issues for Surrey Police.

Q.  Are you saying that it was a failure to appreciate who Mr Perepilichny was prior to receiving those letters that was causing adverse comment or are you saying it was a failure to take action after the letters were received?

MR SKELTON: Sir, sorry to intervene. The word "failure" denotes some form of civil liability or is analogous to civil liability. This is not an investigation into Mr Pollard's investigation with a view to fault finding in respect of it. And I think Mr Moxon Browne knows that, as has been acknowledged at the previous PIR.

MR MOXON BROWNE: Yes, I certainly do and I am sorry if I trespassed in the form of my questions. Simply your last answer was not clear to me whether you were saying that there was adverse criticism you spoke of in relation to delay before those letters were received or whether it was in relation to delay after the letters were received or perhaps both?

A.  My understanding and interpretation of that is that the criticism was not about on the night but it was about the criticism of failing to respond to the letters that...
<table>
<thead>
<tr>
<th>Page 9</th>
<th>Page 10</th>
<th>Page 11</th>
<th>Page 12</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>had been sent in to Surrey Police.</strong></td>
<td><strong>only proves or disproves the cause of death and in doing so reduces the likelihood of conspiracy theories in the future.</strong></td>
<td><strong>both you and the previous coroner, as to public interest immunity matters and so some care needs to be taken in the answer to this question.</strong></td>
<td><strong>which I think stands for National Special Branch Information System, or something like that, it is a database?</strong></td>
</tr>
<tr>
<td>Q. Thank you. That clarifies that.</td>
<td>THE CORONER: Anyone can get caught up in a conspiracy theory, can't they, I mean the police can get caught up in one as far as the investigation is concerned --</td>
<td>MR MOXON BROWNE: I am not aware that anything to do with special branch has been the subject of a PII application, let alone a ruling but then I am not privy to -- not by any means privy to what that involves.</td>
<td>A. That's correct, it is a database, yes.</td>
</tr>
<tr>
<td><strong>Just while we are on the subject of the gold group, and then we can leave that, would you look please at page 371 of your bundle.</strong></td>
<td><strong>Exactly, it is about sticking to the facts following the evidence and then reducing conspiracy theories being perpetuated in the media that may cause public alarm or anxiety.</strong></td>
<td><strong>A. Indeed.</strong></td>
<td>Q. Then we see that there was information about both Mr and Mrs Perepilchnaya apparently on that database. If you go over the page, that is page 367, you will see that there is information there &quot;Tier 1 investors&quot; and there is the name of two companies and then quite a lot of further material has been redacted.</td>
</tr>
<tr>
<td>This sets out the gold group's terms of reference and certainly in the form I have, it précises the minutes for that first meeting.</td>
<td><strong>To ensure Surrey Police retains the confidence of the wider public and stakeholders through a thorough investigation which not only proves or disproves the cause and circumstances of the death but reduces the likelihood of conspiracy theories in the future.&quot;</strong></td>
<td><strong>MR MOXON BROWNE: That is helpful, thank you. Then before we leave these minutes, if we just go for 372, where I think we see the assistant chief constable saying: &quot;Organisational learning, there are three areas</strong></td>
<td><strong>Here it is possible that we may be getting into what I would refer to as Dame Heather Hallett territory and indeed the danger of asking questions upon false assumptions, because you of course are privy to what lies beneath the redactions and so I am very much wishing to be guided by you but my question would be, if you think it is a proper question. Taken together with the gold group's concern that special branch might have been consulted earlier than they were with the inference that they held information that might have been useful, coupled with fairly substantial redactions which as I understand it are made on the basis of some national secrecy interest --</strong></td>
</tr>
<tr>
<td>Item number 2, the terms of reference of the group, says: &quot;To ensure Surrey Police retains the confidence of the wider public and stakeholders through a thorough investigation which not only proves or disproves the cause and circumstances of the death but reduces the likelihood of conspiracy theories in the future.&quot;</td>
<td><strong>Do you know whose wording that was? Are you able to tell me?</strong></td>
<td><strong>A. No, the sentiment of that term of reference is about, as it says, retaining the confidence of the public, ensuring a thorough investigation is conducted, that not</strong></td>
<td><strong>MS BARTON: Sir --</strong></td>
</tr>
<tr>
<td><strong>Q. Was there a feeling -- it is not minuted but was there a feeling in the gold group that all of the need for this inquiry was the product of a conspiracy theory?</strong></td>
<td><strong>A. No, the sentiment of that term of reference is about, as it says, retaining the confidence of the public, ensuring a thorough investigation is conducted, that not</strong></td>
<td><strong>Q. Let's have a look at page 366, as I think Ms Barton wanted me to do.</strong></td>
<td><strong>MR SKELETON: Sorry to clarify again, I think this should be</strong></td>
</tr>
<tr>
<td><strong>A. Well that would have been the assistant chief constable's terms of reference for that meeting.</strong></td>
<td><strong>THE CORONER: Wherever they come from and whoever is the subject of them?</strong></td>
<td><strong>This is a report from Detective Sergeant King, who I think works in special branch, is that right?</strong></td>
<td><strong>A. That's correct.</strong></td>
</tr>
<tr>
<td><strong>Q. Was there a feeling -- it is not minuted but was there a feeling in the gold group that all of the need for this inquiry was the product of a conspiracy theory?</strong></td>
<td><strong>A. Indeed.</strong></td>
<td><strong>I think it is a report from Detective Sergeant King, who I think works in special branch, is that right?</strong></td>
<td><strong>Q. You will see about halfway down the page, &quot;Local NSBIS,</strong></td>
</tr>
</tbody>
</table>
well known in this case, these documents were not the
subject of a PII application before the court. They
were redacted on the grounds of relevance.

THE CORONER: Relevant, right.

MR MOXON BROWNE: Relevance, right.

MR SKELTON: The material that has been redacted is
irrelevant.

THE CORONER: That was my recollection.

MR MOXON BROWNE: If it is irrelevant, obviously the coroner
has seen the material as I have not, I will move on.

But I think the answer came back to Detective
Constable Burden that there was no adverse trace -- not
no trace but no adverse trace. Can you confirm that?

A. That is what is recorded on the electronic investigation
log, that's correct.

Q. Yes.

Can we move then, please, to the lines of inquiry
that you identified at the outset of your investigation.

I think you can agree, perhaps without looking at your
personal notebook or indeed the policy book, that from
the word go intelligence on the Klyuev organised crime
group was your number one line of inquiry.

A. That wasn't the only one. There was a list under the
line of inquiry for intelligence that included the
so-called Klyuev organised crime group, it included

Mr Perepilichny, Mrs Perepilichnaya, Brown Rudnick,
Hermitage, so it included a number of different people
and companies, not just Mr Klyuev or --

Q. I was not suggesting it was your own line of inquiry,
I was suggesting, certainly in your PNB it is listed as
number 1 and in the policy notebook it is certainly
given some prominence as a line of inquiry?

A. Not really, there is no rationale for where it features
as number 1, number 2 or number 10, I mean it just
features as a line of inquiry.

Q. I see.

Sir, for your note, the relevant policies are set
out at pages 69 and 70 of this bundle. And the PNB
reference is 69 and 70.

I think a gentleman called Mr Banner attended your
initial briefing on 29 November?

A. Sorry?

Q. Mr Banner, Mr Gareth Banner?

A. Yes.

Q. He is an intelligence supervisor with Surrey Police?

A. That's correct.

Q. He's a senior man and ex-MoD, I think, Ministry of
Defence intelligence?

A. Yes, I believe he was in the military.

Q. Someone whose views you, I presume, respected as

experienced in a case with this sort of background?

A. Well I -- I mean he was an intelligence supervisor, so,
yes.

Q. Well let's just have a look at what he noted from that
meeting. If you look, please, at page 333 of the
bundle, you will see that this document on page 333 is
headed D316 which is a HOLMES reference and it is that
which tells us that this is the PNB of Mr Banner. He
gives the date, 29 November 2012. We know from other
evidence that you held a substantial briefing meeting on
that day with many attendees.

One sees from the second paragraph, and this is
I think a briefing that has been given by you as to the
factual background:

"On 10 November 2012, left home address [this is
Mr Perepilichnyy] went for a run 4.30, overweight, drank
and smoked heavily."

From where had you obtained that information?

A. There was, at the start, some confusion as to certain
facts around Mr Perepilichnyy's health. So I think that
came from the earlier investigation, but that was
something to be clarified and indeed was clarified later
on because clearly he wasn't overweight, he didn't drink
and he gave up smoking 13 years ago. So often at the
start of an inquiry you get a lot of information and you

have to check that information for accuracy, which is
what was later done.

Q. If you go forward, please, in his notes to page 337, and
you will see:

"Intelligence, victim, family associates ..."

Then "OCG", which stands for "organised crime
group", and then in brackets "KOCG", which stands for
"Klyuev organised crime group":

"... times of entries to UK or are they resident?"

So either you are saying or Mr Banner is saying, or
at any rate Mr Banner is thinking, that it would be
sensible to discover who of the identified members of
the KOCG was in the UK at the relevant time?

A. Well they are his notes, but, you know, I can't speak
for his notes but that is what is there, so.

Q. That is perfectly fair but it must have occurred to you,
I suggest, it was something you wanted to do was to find
out whether any of what I might call, very loosely,
"candidates" was in the UK at the relevant time?

A. Inquiries were made by a DC Evans around the organised
crime group and the Klyuev and there was no information
about them, which is recorded in my concluding report.

Q. You say that inquiries were made by someone called
Police Constable Evans?

A. That's correct. The only reference to -- in his report,
the only reference to the Klyuev organised crime group was which was found on a website called Russian Untouchables.

Q. That is Hermitage's website, isn't it?
A. As I understand it, yes, it is Hermitage's website.

Q. That gave you the names, quite a lot of detail and there is a lot of documentation showing you have taken all that on board. What I am asking is who was responsible for pursuing the inquiry that Mr Banner has identified, that is to say, who of these people was in the UK at the relevant time, which is an obvious inquiry to make?

A. Well those inquiries were conducted by DC Evans, he submitted a report and his report was that, and bear in mind he had made inquiries with as was then SOCA and SOCA International and those reports were negative in terms of any acknowledgement or attribution to the Klyuev organised crime group. And that is contained in his report.

Q. You say he went to SOCA to find out this information?
A. Yes, it is set out clearly in his report.

Q. Yes, would you look at page 342 of the bundle in front of you, which is a report from -- sorry, I have the wrong reference.

347 I should have said. This is a witness statement from Suzanne Leadbetter, she is an analyst I think working with the major crime team?

A. Correct.

Q. She produced some very valuable tables compressing a lot of information, showing what Mr Perepilichny had been spending money on, where he had been and the flights he had been taking.

A. Yes, that's correct.

Q. We see under the bold letters about two-thirds of the way down, "SCL1, report to show phone usage". Then below that:

"On 5 July 2013 I compiled a chart to show the last six months of travel made by Alexander Perepilichnyy using information provided to the investigation by the South-East Counter Terrorism Unit. This was later annotated."

So she went to SECTU to get this information apparently?

A. Yes, well there is what is called the National Borders Targeting Centre. It records details of people's travel in and out. It can be applied for by any person working within the police or law enforcement. It just so happened this particular request was made of SECTU, nothing other than that really, it is a straightforward request for information and that unit was the unit that applied for it.

Q. Yes. Can you explain -- sorry, you said the name of the unit that actually has the data. Could you just say that again?

A. It is the South-East Counter Terrorism Unit.

Q. Not that one, the one that holds the data?
A. It is the National Borders Targeting Centre.

Q. I will call them "National Borders" for the moment.

A. National Borders.

Q. Can you just help me with this, plainly National Borders was able to provide SECTU, who in turn provided Ms Leadbetter, with extremely detailed information about what airports Mr Perepilichny had flown from both in the UK and abroad.

Is that something which everybody who travels is -- that type of ... "surveillance" is the wrong word but that type of gathering of information, does that apply to everybody or just people who are of interest to the security services or just to Russians or what?

A. It applies to everybody, no so different, you know, if you go online you leave a trace, if you book on with Amazon there is always a -- there is a correlation, there is always a movement of your transactions. It is no different to that, it just records everybody's travel in and out of the UK. So there is no -- nothing unique to that, it is not unique to certain individuals and it is certainly not unique to any particular law enforcement. It just holds data of travel.

Q. That is helpful, I was wondering about that.

Is it fair to say that if you could obtain that very detailed information about Mr Perepilichny, so you could also have obtained similar information about other named individuals if it is that easy to do?

A. Well, the request for information is a proportionate request and in those circumstances it was proportionate to make that request for Mr Perepilichny to establish his movements but on the basis that DC Evans's report did not identify or attribute the existence of the Klyuev, then I wasn't at that point of the inquiry prepared to then track everyone else's movements just because they happened to be mentioned on a website called Russian Untouchables.

Q. Basically you thought that the information you were being provided about who might be in the frame, if I can use that expression, was not reliable, and it was not a matter you were interested in pursuing?

A. No, no, that is not -- what I said on Friday was it is about proportionality and identifying relevant lines of inquiry. So if the circumstances had been completely different and if the circumstances had identified evidence of murder, then I would have reviewed my lines...
Mr Pollard, you are the SIO?

A. Yes, my page 87 is not what you are referring to, so...

perhaps if someone can direct me to --

THE CORONER: What is the first bit on your page 87? Does it have "Policy number 29"?

A. Yes, it does, yes.

THE CORONER: Then if you go down --

A. I see the... okay, I've got it, yes, thank you.

THE CORONER: In fact you need to go to policy number 30, I think, do you have that?

A. Yes, I've got it, thank you.

MR MOXON BROWNE: Then I am going over the page:

"The justification is raised by SIO..."

I was just identifying that that is you, the senior investigating officer?

A. Yes.

Q. ... and discussed at the gold group meeting held on 10 December. In relation to Hermitage those allegations and circumstances are already known to SOCA and have been since 2007. SOCA's position remains that the crimes were carried out in Russia and outside the UK, so we have no power to investigate."

Then (2):

"The potential threat to the United Kingdom from Russian organised crime groups is something SOCA are sighted on at this moment in time. There is no expectation that this investigation will be required to investigate these OCGs."

Is the position that either SOCA or the gold group were effectively telling you to back off this particular aspect of your inquiry?

A. No, not at all. The reason I raised that was because when my officers went to see the three representatives for Hermitage on 6 December, they reported back obviously the circumstances surrounding the Hermitage case, the Magnitsky Act and also the implications of, or potential implications, the Magnitsky Act and its implications for organised crime generally.

So, having been informed of that information by my officers, it was right and proper that I raised that at the gold group and reference to SOCA, SOCA were aware of Hermitage's fraud investigation because they had been written to and asked to investigate, along with the City of London Police, the director general, the Serious Fraud Office with whom Hermitage asked to investigate their fraud in Russia and, as SOCA rightly said, they have no jurisdiction to investigate crimes in foreign countries, and Hermitage were told that.

So it is, and quite clearly as with any other level of criminality or organised crime, sometimes there is...
### Question and Answer Summary

**Q.** What I am really trying to get at is what caused this warned off or told not to pursue it.

**A.** So yes, the action is to carry out a task and then they get reviewed as to whether they remain relevant or not and in this case it was referred on the basis that they had no information to provide my officers and for that reason there was no requirement to take a statement from Mr Browder.

**Q.** Yes, I mean the action that was originally recorded as something that ought to be done was: "TST [take statement] Bill Browder, CEO of Hermitage."

**A.** That was the task, and then you say it is referred on 11 February 2013 and you say "It is no longer considered these actions are relevant"?

**Q.** That's correct.

**Q.** You translated that policy into action, or at least a declining to take action in a number of important respects. Perhaps we could look at the situation with regard to talking to Mr Browder at page 348 of the bundle.

**A.** That's correct.

**Q.** The fact is that you never did take the statement from Mr Browder?

**A.** Didn't need to, because we had spoken to his three representatives and they had no direct evidence to provide my inquiry that would assist it or take it any further:

**Q.** I see. Then the files that you had been provided with, or those that your officers had been provided with by those members of staff, a tiny fraction of which we see in the bundles but very, very detailed documentation was supplied. That was the subject of an action which was referred if we look at page 349, so you are given -- I think it was Detective Constable Pollard, no relation, was given the files.

**A.** Yes.

**Q.** What is "SIR"?

**A.** It stands for "strategic intelligence requirement".

**Q.** Sorry, I didn't hear?

**A.** It stands for strategic intelligence requirement.

**Q.** Yes. That was something that was obviously to be done, to read those files that you had been given.

---

<table>
<thead>
<tr>
<th>Page 25</th>
<th>Page 26</th>
<th>Page 27</th>
<th>Page 28</th>
</tr>
</thead>
<tbody>
<tr>
<td>a risk to the United Kingdom, be that from another country or another -- so yes, they are of course sighted on organised crime which includes Russia. Which is why that comment is made there. From my perspective, my focus was to investigate, as my three aims were, the cause of death, the circumstances of the death and pursue any criminally related offences, with the two working hypotheses I identified and not to, on this occasion, until I am informed of the circumstances of the death, go off at a tangent and investigate Russian organised crime. That was the context of that policy entry, not because I was warned off or told not to pursue it.</td>
<td>Q. You translated that policy into action, or at least a declining to take action in a number of important respects. Perhaps we could look at the situation with regard to talking to Mr Browder at page 348 of the bundle. This is called an action record print. I think the word &quot;action&quot; in this context is a term of art, it is a formal word that you make lists of actions, things that you think need to be done. Then you have a system for following through to see whether those actions have been done or whether it is necessary to pursue them. Is that roughly how it works?</td>
<td>A. So yes, the action is to carry out a task and then they get reviewed as to whether they remain relevant or not and in this case it was referred on the basis that they had no information to provide my officers and for that reason there was no requirement to take a statement from Mr Browder.</td>
<td>A. That's correct. Q. The fact is that you never did take the statement from Mr Browder? A. Didn't need to, because we had spoken to his three representatives and they had no direct evidence to provide my inquiry that would assist it or take it any further: Q. I see. Then the files that you had been provided with, or those that your officers had been provided with by those members of staff, a tiny fraction of which we see in the bundles but very, very detailed documentation was supplied. That was the subject of an action which was referred if we look at page 349, so you are given -- I think it was Detective Constable Pollard, no relation, was given the files. The intelligence manager, intelligence: &quot;To review files Hermitage have provided and act in accordance with the aims of published SIR.&quot;</td>
</tr>
<tr>
<td>Page 29</td>
<td>Page 30</td>
<td>Page 31</td>
<td>Page 32</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>1 You say:</td>
<td>1 the first hurdle because the Crown Prosecution Service</td>
<td>1 page 119. (Pause)</td>
<td>8 (Pages 29 to 32)</td>
</tr>
<tr>
<td>2 &quot;The senior investigating officer's stated lines of</td>
<td>2 would have asked me what offence I am investigating, and</td>
<td>2 You say there, under the heading &quot;Intelligence&quot;,</td>
<td></td>
</tr>
<tr>
<td>3 inquiry that ran alongside...&quot;</td>
<td>3 in the absence of a cause of death or evidence of there</td>
<td>3 this is you reporting effectively to the coroner:</td>
<td></td>
</tr>
<tr>
<td>4 This is a decision taken on 11 March 2014, basically</td>
<td>4 being murder, clearly I would not have been successful in</td>
<td>4 &quot;Given the nature of the inquiry, the below agencies</td>
<td></td>
</tr>
<tr>
<td>5 saying you are not going to do it.</td>
<td>5 that.</td>
<td>5 were contacted and local intelligence checks undertaken</td>
<td></td>
</tr>
<tr>
<td>6 MS BARTON: Perhaps it would be helpful if he read the</td>
<td>6 Furthermore, the actual — had there been any</td>
<td>6 on all available information known about Alexander and</td>
<td></td>
</tr>
<tr>
<td>7 middle paragraph of that as to the reason why it wasn't</td>
<td>7 evidence, you then have to determine when that would</td>
<td>7 his family. SOCA [Serious Organised Crime Agency] SECTU</td>
<td></td>
</tr>
<tr>
<td>8 going to be done, if this is being put.</td>
<td>8 have happened, how and so forth before you can then</td>
<td>8 [South-East Counter Terrorism Unit], Surrey special</td>
<td></td>
</tr>
<tr>
<td>9 MR MOXON BROWNE: Yes. We can read the whole thing, if</td>
<td>9 identify who your persons of interest, suspects or</td>
<td>9 branch, Surrey and Sussex Police Information</td>
<td></td>
</tr>
<tr>
<td>10 anybody wants to:</td>
<td>10 witnesses may be, so until I am aware of that</td>
<td>10 Assistance.&quot;</td>
<td></td>
</tr>
<tr>
<td>11 &quot;The detailed toxicology tests have now been</td>
<td>11 information, that is why it would have added no value</td>
<td>11 Then you say:</td>
<td></td>
</tr>
<tr>
<td>12 completed and have not identified any cause for concern.</td>
<td>12 whatsoever in sending officers to speak to Stepanov,</td>
<td>12 &quot;Intelligence research did not uncover any</td>
<td></td>
</tr>
<tr>
<td>13 It appears that Alexander Perepilichnyy was not</td>
<td>13 Pavlov or Kovtun because I was not able to determine</td>
<td>13 information to suggest or indicate Alexander was at risk</td>
<td></td>
</tr>
<tr>
<td>14 administered any poisonous or noxious substance that</td>
<td>14 evidence of an offence of murder and therefore their</td>
<td>14 of any harm, threat or retribution from any individuals</td>
<td></td>
</tr>
<tr>
<td>15 caused his death.&quot;</td>
<td>15 status in that inquiry was clearly unknown and would not</td>
<td>15 or that his death had anything to do with his status</td>
<td></td>
</tr>
<tr>
<td>16 What I am interested in is the fact that it would</td>
<td>16 have added value at that time for those reasons.</td>
<td>16 connected with the Swiss money laundering</td>
<td></td>
</tr>
<tr>
<td>17 appear that these files were never read?</td>
<td>17 Q. Yes, what I am really interested in is the rather</td>
<td>17 investigation.&quot;</td>
<td></td>
</tr>
<tr>
<td>18 A. What the action — they were not read but what I did ask</td>
<td>18 shorter point, not so much why you didn't pursue these</td>
<td>18 Is the point you are making there that the people</td>
<td></td>
</tr>
<tr>
<td>19 for, because of the size of the file, was I wanted</td>
<td>19 things but rather simply to confirm that you didn't.</td>
<td>19 that you consulted, that is to say SOCA, SECTU, special</td>
<td></td>
</tr>
<tr>
<td>20 an actual timeline presented to me from Hermitage</td>
<td>20 A. I have explained the reasons why we didn't.</td>
<td>20 branch and your database, haven't thrown up any data of</td>
<td></td>
</tr>
<tr>
<td>21 setting out exactly what their interaction was with</td>
<td>21 Q. Yes.</td>
<td>21 the kind you describe? Is that the point you are</td>
<td></td>
</tr>
<tr>
<td>22 Mr Perepilichnyy, which is what they then subsequently</td>
<td>22 I would just like to see how this is dealt with in</td>
<td>22 making?</td>
<td></td>
</tr>
<tr>
<td>23 provided on 18 December, which provided no content at</td>
<td>23 your final Operation Daphne report to the coroner,</td>
<td>23 A. Well, it is what it says. So those were, you know,</td>
<td></td>
</tr>
<tr>
<td>24 all of any direct evidence they had that</td>
<td>24 originally addressed to the senior coroner for Surrey.</td>
<td>24 extensive inquiries with those law enforcement and</td>
<td></td>
</tr>
<tr>
<td>25 Mr Perepilichnyy had raised any cause for concern in</td>
<td>25 The extract I want to look at, is in the bundle at</td>
<td>24 intelligence agencies and as a result of that the</td>
<td></td>
</tr>
<tr>
<td>Page 33</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Day 6</strong>  Inquest into the death of Alexander Perepilichny  13 June 2017</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Q.** Then you go on to say, in fact I would suggest rather remarkably: "Equally there was no intelligence to show that Alexander Perepilichnyy had any criminal links to organised crime groups within the UK, Ukraine or Russia."

**A.** That was the information you were leaving with the coroner.

**11**

**A.** That is because that what the -- those inquiries identified to me that there was no intelligence, that's correct.

**Q.** Did you not think it would be helpful to the coroner to correct.

**14**

**A.** No, sir.

**Q.** Can you turn particularly to Mr -- yes, just before we leave that. I think you gave a statement last year to the senior coroner for Surrey in relation to this part of your report, in which you describe it as a "gist".

**19**

**A.** Well, I don't see where that information says that he was intimately involved in an organised crime group.

**Q.** Is your position today that as far as you are concerned he had no links with any organised crime group?

**A.** Yes, that is my position, yes.

**Q.** Is your position today that as far as you are concerned he had no links with any organised crime group?

**A.** That's correct, that is my position, yes.

**Q.** That is where you are coming from?

**A.** That's correct.

**Q.** Can you turn particularly to Mr -- yes, just before we leave that. I think you gave a statement last year to the senior coroner for Surrey in relation to this part of your report, in which you describe it as a "gist".

**15**

**A.** Well because this sets out -- rather than detail every single report or response, it sets out the gist of the inquiries that I took with those agencies, it is as straightforward as that.

**Q.** Can I turn please to Mr Kovtun, the man wanted for the murder of Mr Litvinenko. I want you to look at a newspaper story which appeared in the Daily Telegraph in I think December 2012, we have it at page 363. It says: "Public records show that a legal representative acting for Mr Perepilichnyy told a court in Moscow in 2011 that the businessman was living outside the Russian Federation because he feared for his life."

**19**

**A.** As I explained before, my inquiry is based on evidence and certainly with the inquiries I made with those law enforcement intelligence agencies on graded intelligence.
Proceedings against Mr Perepilichnyy, but that was all just based on a newspaper story?

A. Well —

Q. Do you want to look at it? Will you take it from me or would you want to look at it, look at it if you like?

A. I would rather look at my statement, please.

Q. Yes, paragraph 64.

Your statement, can we just get the date of it because it is quite late on in the piece, it is 12 August 2016. You say:

"Hermitage included in this same report information of some lawsuits that had been taken out in Russia against Mr Perepilichnyy reported in the press. They claimed that one such lawsuit has been taken out against Mr Perepilichnyy by a company, the founder and general director of which was allegedly Dmitry Kovtun, a suspect on the murder. Again this information was based on newspaper articles as opposed to any direct evidence they had in their possession."

Of course by 2016 you knew perfectly well, didn't you, the Skypes showed that this was no mere newspaper story, there was quite a lot of evidence about it?

A. I wouldn't say there was a lot of evidence but this relates to the fact that Hermitage themselves had no direct evidence themselves, and they were simply referring to newspaper articles. That is what that means.

Q. I accept that, Mr Pollard, but this is information you are giving to the coroner and you didn't see fit to add, "But of course since then I have ascertained that this is reality, not just a newspaper story?"

A. Well, I didn't no, because as I say that is my explanation in that paragraph, it is about Hermitage.

Q. I see.

Can we now stray for a moment outside the bundle you have, into bundle 2, because there is a document that I had neglected to extract, which you can help us with. It is at 623.

This is a report by Ekaterina Clark-O'Connell, it is headed "Forensic computer examination". It doesn't bear a date so I think we will have to do without that but it says:

"Following a request by DC Jones of SECTU on behalf of Surrey Police for Russian/Ukrainian speaking personnel Ekaterina Clark-O'Connell and Snezhana Lennon were seconded to view downloaded material from the computer, we were asked to conduct searches of all PDF, Word, Skype, jpeg and Excel documents in Russian and Ukrainian..."

In accordance with a forensic computer examination
### Day 6

#### Inquest into the death of Alexander Perepilichny

13 June 2017

<table>
<thead>
<tr>
<th>Page 41</th>
<th>Page 42</th>
<th>Page 43</th>
<th>Page 44</th>
</tr>
</thead>
<tbody>
<tr>
<td>&quot;Spoken to the lawyer, they have advised me not to mention Bill Browder for now.&quot;</td>
<td>Q. Were you aware that that transaction, with that date, is more or less exactly the time that Mr Perepilichny's Swiss bank accounts were being frozen by the Swiss authorities?</td>
<td>Q. Then over the page, towards the end, I think it is about three paragraphs up, she is talking about the computer, and she says: &quot;My impression was that this computer was used not only by Alexander but the family as well, perhaps he had a different computer. There seemed to be not enough documents, emails or files relating to business work, leisure or personal information. Most retrieved documents [that is the one she has drawn your attention to] are dated 2011, not many for 2012.&quot;</td>
<td>11 (Pages 41 to 44)</td>
</tr>
<tr>
<td>Did you know who was the owner of the News Rus.com -- or an owner of the News Rus.com Skype address?</td>
<td>A. No.</td>
<td>She was telling you, wasn't she, she didn't think they were looking at the right computer?</td>
<td></td>
</tr>
<tr>
<td>Q. You didn't make the link to Andrei Pavlov?</td>
<td>A. No.</td>
<td>A. Yes, which is what was raised with the family liaison officers which was to go back to Mrs Perepiliphnaya and ask if there was another computer and to surrender that computer.</td>
<td></td>
</tr>
<tr>
<td>Q. No?</td>
<td>Then in relation to financial matters, there is a document, 135949, can you help me as to what that referencing system refers to, we have never seen any of these documents, probably no reason why we should but what is that a reference to? It is not a HOLMES reference, is it?</td>
<td>&quot;My impression was that this computer was used not only by Alexander but the family as well, perhaps he had a different computer. There seemed to be not enough documents, emails or files relating to business work, leisure or personal information. Most retrieved documents [that is the one she has drawn your attention to] are dated 2011, not many for 2012.&quot;</td>
<td></td>
</tr>
<tr>
<td>A. No.</td>
<td>A. No, I think that would be a reference to the files that were downloaded from the computer, that is my interpretation of that.</td>
<td>She was telling you, wasn't she, she didn't think they were looking at the right computer?</td>
<td></td>
</tr>
<tr>
<td>Q. They were given these numbers internally, so people didn't get in a muddle as to what they were talking about?</td>
<td>Q. They were given these numbers internally, so people didn't get in a muddle as to what they were talking about?</td>
<td>She was telling you, wasn't she, she didn't think they were looking at the right computer?</td>
<td></td>
</tr>
<tr>
<td>A. Well I would imagine so. Yes.</td>
<td>Q. Yes. So we have an Alliondo invoice, a Credit Suisse bank statement for Aliondo, a Credit Suisse bank statement for Quartel, credit of large sums of money,</td>
<td>A. Yes, which is what was raised with the family liaison officers which was to go back to Mrs Perepiliphnaya and ask if there was another computer and to surrender that computer.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

1. strategy provided by you.
2. That would indicate, am I right, that
3. Ms Clark-O'Connell was in fact tasked with looking at all the Skype, or have I misunderstood?
4. I call them "Skypes", is it "Skype messages"?
5. A. I think it was a year's worth she looked at I think.
6. Q. A year's worth?
7. A. I think something, I have read that -- I am sure that was the case but ...
8. Q. That was my impression but I understood from your evidence on Friday that you only looked at two weeks and that Justin Pollard, DC Justin Pollard, had sort of almost stumbled across Dzhirsa doing a bit of professional curiosity. Anyway she has looked at those things, or says she has, and then she rehearses various threats and things that might be relevant to your interest in threats and blackmail, "Don't do silly moves", "We have everything under control", details about where to transfer money, "You will go to prison about where to transfer money, "You will go to prison for a long time", "If you want a safe free life you have to pay 300,000 roubles", which is £6,000.
9. Then no direct documents found between Alexander and Hermitage but a few items of correspondence mentioning Hermitage. Then in the Skype folder, at 64579, from UK -- from Alexander to News.Rus.com:
10. "Spoken to the lawyer, they have advised me not to mention Bill Browder for now."
11. Did you know who was the owner of the News Rus.com -- or an owner of the News Rus.com Skype address?
12. A. No.
13. Q. You didn't make the link to Andrei Pavlov?
14. A. No.
15. Q. No?
16. Then in relation to financial matters, there is a document, 135949, can you help me as to what that referencing system refers to, we have never seen any of these documents, probably no reason why we should but what is that a reference to? It is not a HOLMES reference, is it?
17. A. No, I think that would be a reference to the files that were downloaded from the computer, that is my interpretation of that.
18. Q. They were given these numbers internally, so people didn't get in a muddle as to what they were talking about?
19. A. Well I would imagine so, yes.
20. Q. Yes. So we have an Alliondo invoice, a Credit Suisse bank statement for Aliondo, a Credit Suisse bank statement for Quartel, credit of large sums of money, a Credit Suisse bank letter, notice of failure to provide additional collateral and notice of liquidation for failed margin call.
21. Did that raise an eyebrow with you? This man was said to be fabulously wealthy and is apparently in trouble with Credit Suisse and cannot meet his margin calls?
22. A. Not really because I think there was correspondence that he was having lawsuits taken out against him, he was selling underweight barrels of milk from his condensed milk so he clearly operated in a big financial environment and so nothing here jumps off the page that would suggest that this related to him being under threat or being murdered, it is just financial dealings with the multi-million pound businesses that he purported to be involved in.
23. Q. What does jump off the page, doesn't it, even for someone who as you say was moving in multi-million pound circle is a bank statement from April 2011, "Money transaction from precious metals", the sum of $500 million. That is a staggeringly large sum of money, isn't it?
24. A. It is, yes.
25. Q. Did that attract your attention?
26. A. No.
Day 6  
Inquest into the death of Alexander Perepilichny  13 June 2017

<table>
<thead>
<tr>
<th>Q. Hmm.</th>
<th>A. Well, that is how I understood that.</th>
</tr>
</thead>
<tbody>
<tr>
<td>You told us on Friday your understanding of the position about Mr Perepilichnyy's life insurances, and you recited that you were aware that he had an existing policy with Aviva for 500,000 taken out in May 2012 and that he had then applied and got 2 million of cover from Legal &amp; General.</td>
<td>A. Well, based on his report to Legal &amp; General when he claimed he had £26 million worth of assets, £2 million worth of cashable assets I think it was and another figure of 1.1. That to me is someone that is an extremely wealthy person.</td>
</tr>
<tr>
<td>Q. How do you know he was a very wealthy man?</td>
<td>Q. Yes, I don't know whether you have read the documents carefully enough to see that that information actually came not from Mr Perepilichny but from the bank called EFT.</td>
</tr>
<tr>
<td>A. Well, again you know the fact he took life insurance policy out for that amount of money is a matter for him. I mean he was a very wealthy man and wanted to no doubt look after his family, so whether that was to maintain himself in rented accommodation but clearly he was at the same time maybe making enquiries about purchasing a property.</td>
<td>A. No, because he was -- the reason for that visit was -- well, he was not with his wife, so.</td>
</tr>
<tr>
<td>Q. Do you know anything about them?</td>
<td>Q. Sorry, I didn't hear?</td>
</tr>
<tr>
<td>A. That's correct, yes.</td>
<td>A. He was not with his wife, so whether that had some bearing on it, I don't know.</td>
</tr>
<tr>
<td>Q. You said that didn't seem to be anything very remarkable about that and anyway it was all to do with buying a house?</td>
<td>Q. Hmm.</td>
</tr>
<tr>
<td>A. As I understand it, that was what was reported later by Mrs Perepilichnaya but there was also within this correspondence or examination of the computer, reference to purchasing a property for between £5 million and £6 million, I think.</td>
<td>A. I wasn't asked that question. I was asked whether or not I would have known if he would have given any false or different name and my answer to that question was no I wouldn't. I was not asked about addresses.</td>
</tr>
<tr>
<td>Q. Well, it is obvious that, from -- I would suggest from the text that you have read that throughout 2012 the Perepilichnyys were looking to move. And it may be that they had amongst other ideas the idea of purchasing but most of the messages are about renting.</td>
<td>Q. You are in fact aware that he did give --</td>
</tr>
<tr>
<td>A. Well, again you know the fact he took life insurance policy out for that amount of money is a matter for him. I mean he was a very wealthy man and wanted to no doubt look after his family, so whether that was to maintain himself in rented accommodation but clearly he was at the same time maybe making enquiries about purchasing a property.</td>
<td>A. Yes, he gave his Virginia Water address.</td>
</tr>
<tr>
<td>Q. Let’s have look at that, page 394 of the bundle, it may be that you might have attached rather more significance to this extraordinary accumulation of life insurance?</td>
<td>Q. Did you think that was significant --</td>
</tr>
<tr>
<td>A. Again, it is a matter for Mr Perepilichnyy as to why he wanted those policies.</td>
<td>A. No, because he was -- the reason for that visit was -- well, he was not with his wife, so.</td>
</tr>
<tr>
<td>Q. I am just wondering if -- it is nobody's fault but if you had had accurate information at the time, whether you might have attached rather more significance to this extraordinary accumulation of life insurance?</td>
<td>Q. Sorry, I didn't hear?</td>
</tr>
<tr>
<td>A. Not really. I mean, when we went to see Legal &amp; General, I mean they didn't raise any concerns, they were quite happy and surely they would have done these due diligence checks and found out he was applying for insurance and life insurance policies but clearly they were not bothered or concerned because they granted him the policy. So I mean I don't operate in the world of life insurance, so I am -- you know, it is what it is from my perspective, sir.</td>
<td>A. He was not with his wife, so whether that had some bearing on it, I don't know.</td>
</tr>
<tr>
<td>Q. Do you think you perhaps forgot to mention was that he did give a false address?</td>
<td>Q. Hmm.</td>
</tr>
<tr>
<td>A. I wasn’t asked that question. I was asked whether or not I would have known if he would have given any false or different name and my answer to that question was no I wouldn’t. I was not asked about addresses.</td>
<td>A. Sorry, what was the number?</td>
</tr>
<tr>
<td>A. Not a false name, no.</td>
<td>THE CORONER: 395.</td>
</tr>
<tr>
<td>Q. No. What I think you perhaps forgot to mention was that he did give a false address?</td>
<td>A. 395?</td>
</tr>
</tbody>
</table>

Page 45

Page 46

Page 47

Page 48

12 (Pages 45 to 48)
Page 49

1. It looked as if he had joined that club under a false name?
2. A. Well, no. I mean I read that as what it was. I mean, no, I mean he is not under a membership in that name, so I mean I can't explain why Mrs Perenichnaya, I mean she may have thought that he was a member of a gym, because she told the FLOs he was a member of a gym. She may have thought that is where he was, which is why she couldn't find him, so, you know, I don't read anything into that at all. Perhaps he wasn't truthful with her when he said he was a member of a gym. I don't know.
3. Q. Were you aware that Detective Constable Burden, who is giving evidence I think later today, spoke with Mrs Perenichnaya on the evening of Mr Perepilichnyy's death?
4. A. Yes, I was aware he had spoken to her.
5. Q. I think apart possibly from some formal exchanges and from talking to family liaison officers, he actually is the only officer who ever spoke to Mrs Perenichnaya?
6. A. No, he is not the only officer -- sorry, can you repeat the question?
7. Q. If you leave on one side the family liaison officers, who have a special function --
8. A. Yes.

Page 50

Page 51

1. Q. -- and if you leave aside some formal contact about identifying telephones or matters of that sort, Detective Constable Burden was the only police officer from Surrey Police who ever spoke with Mrs Perenichnaya.
2. A. I think that is correct, yes. I believe so.
3. Q. No inquiries about who was at the house on the day of Mr Perepilichnuy's death, who was visiting, what cars were in the drive, where he had been?
4. A. Sorry on what date?
5. Q. On any date, apart from what she told Mr Burden on the day, never got any information from her at all.
6. A. Well the FLOs tried to get information from Mrs Perenichnaya when they went to see her and had contact with her on a number of occasions, so you know --
7. Q. Were you aware -- sorry.
8. A. I was just saying, efforts were made to find information from Mrs Perenichnaya.
9. Q. Were you aware that on the day of Mr Perepilichnuy's death, Mrs Perenichnaya told Detective Constable Burden that Alexander had visited the gym prior to his jog?
10. A. Well, without reading it, then I can't recall that now, no.
Day 6  Inquest into the death of Alexander Perepilichny  13 June 2017

1. A. Yes.
2. Q. If we go through that, we can see, for example, on page 2, he is in Italy at the Grand Hotel Milano in the middle of the page.
3. Then on page 3 there is a credit card payment to Air France.
4. On page 4 at the bottom left we see Dining Suite Restaurant Hounslow, on 8 November, which might be at Heathrow one would think.
5. Then on page 5, on the left, we have a purchase made in Paris and then we have got payments to various hotels, including the Bristol, and then --
6. THE CORONER: Can you see? It may be those are black on yours.
7. A. I can't read those transactions here but I mean I am familiar with there being transactions in France.
8. MR MOXON BROWNE: Yes.
9. Then on page 386, on the right-hand side, 10/11, that is the day of his death, Tesco.
10. On page 7, 387, we have getting some petrol and then that is it.
11. What is the history of this document, how did it come into being?

Page 53

1. A. Well, it was the -- it was a timeline produced by the analyst that showed his movements, so it shows at the top Mr Perepilichny and his movements, then the house, then the phones and then the credit card.
2. Q. You see, what is a little bit puzzling is that there is another version of this document, which starts on page 373, which contains information which is omitted from the second one. I am just trying to work out with your help the relationship between the two documents.
3. Have a look at the one --
4. A. No, no, I know exactly what you are talking about.
5. So there were two versions, because originally there were eight transactions that were -- well, there was some financial details obtained from a credit card company that was for intelligence purposes only and there were some sensitivities around that, so therefore at that stage I couldn't include them in the overall timeline.
6. However, as is what is required, the duty to review material is ongoing, which I did, and so subsequently it turns out that that -- I was able to use that information, which is why there was then the second timeline which included those transactions.
7. So that is the explanation, sir.
8. Q. I don't think that is right because I think the one we are about to look at was quite plainly produced first.
9. I mean all this is dealt with --
10. A. Yes, no, it was produced first and as part of the original disclosure to Her Majesty's coroner in April 2014, the -- I suppose the redacted version of the timeline minus those eight transactions were submitted but I also took instructions from Surrey legal services as to the reasons for that and how we would deal with the other matters. As I have done with other documents in this case.
11. Q. We can find the document if we need to but if I just remind you that Ms Leadbetter's personal notebook shows that the version at page 373 was produced first and she was then directed by you to produce a second version?
12. A. That's right, for the reasons I have explained.
13. Q. I thought that you were saying that the fuller version was produced after the less full version, as a result of some --
14. A. Sorry, sorry. The fuller version, if that was first, it would have been first, which is obviously why I had to review the content of it based on the request made of myself around the sensitivities of how that credit card information was obtained, which is then when the second one was produced. So that is the sequence of events.
15. Mr Moxon Browne is right in that regard but for the reasons I have explained, that was the reason for that.
16. Q. Yes.
17. Let's have a look at page 375. You will see that the third item which doesn't appear on the version that was originally put before the coroner, credit card payment to Kalinka food store in London, transactions with Raiffeisenbank £24, and then someone, so it must be Ms Leadbetter, has added a note:
18. "This is the food store used to purchase the ingredients for AP's final meal prepared by Tatiana."
19. I just wanted to know where that information came from, because I think we haven't heard that from anybody, that that was where the food was bought?
20. A. Well, I assume that came from the family liaison officer's reports, I wouldn't have thought -- well I assume it came from the family liaison officer reports.
21. Q. I mean the evidence we have heard is it either came from a shop near Harrods, and I don't think Kalinka --
22. Kalinka is in Bayswater I think, or from Tesco or Sainsbury's but where does this Kalinka come from, who gave you that information?
23. A. I don't know.
24. Q. Why did you direct Ms Leadbetter to remove that item?
25. A. I didn't. Well, as I have explained, that was part of

Page 54

Page 55

Page 56
A. It is not the content of the information, it is where it came from.

Q. Then if you go over the page to 376, my copy is difficult or impossible to read. Yours may be the same.

A. Same.

Q. Along the bottom there, perhaps you will take it from me, none of those items appear on the second version and I think in each case they refer to visits to hotels in France.

A. That's correct, yes.

Q. Why did you take those out?

A. I have explained and given an answer for that.

Q. Then on page 6 of 8 --

A. Page what number?

Q. 6 of 8 -- sorry, 378, we have credit card payment to Tesco, financial transactions to Raiffeisenbank for 593, or 583, we clarified that, which you see the £593 or £583, we clarified that, which you were aware of.

Q. Well, to be strictly accurate it was I who drew your attention to the fact it was a typo. What I want to know is when you were given that information by Ms Leadbetter, whether you thought it was something you thought you ought to be pursuing?

A. No.

Q. No.

Do you agree with the proposition that your conclusion, as set out in your Operation Daphne report and as released to the press on 6 June 2013 that there was nothing suspicious about Mr Perepilichnyy's death was based on your failure to look at his connections with the Klyuev organised crime group and the information you were given by Hermitage?

A. No, my conclusions were based on evidence and graded intelligence that led to those conclusions which was outlined in my report.

Q. And still, as I understand it, today, you are denying that there was any connection between Mr Perepilichnyy and an organised crime group?

A. I based that on the evidence and the graded intelligence that was provided during the course of the investigation.

Q. But you cannot actually -- you are aware he didn't have any business interests here, aren't you?

A. Well I thought they were both tier 1 investors, that was my understanding of it.

Q. Were you aware that in order to put up the £1 million that is necessary Mrs Perepilichnaya borrowed the money from the EFG Bank?

A. I was not aware that she had borrowed the money, no.

Q. When you say that he was in the UK for business purposes, what business purposes had you in mind?

A. Just what he set out on his visa, that he was a tier 1, wanted to invest in the United Kingdom.

Q. But you cannot actually -- you are aware he didn't have any business interests here, aren't you?
A. No, he didn't but I gauged that by what was on his visa applications.

Q. What you wrote here was based on a fairly fundamental misunderstanding of the true position, wasn't it?

A. No, he didn't but I gauged that by what was on his visa applications.

Q. That was correct. That was my conclusion based on all the information obtained from the SIM card.

A. That was correct. That was my conclusion based on all the information obtained from the SIM card.

Q. In terms of determining whether Mr Perepilichnyy was the subject of threats or requests for protection money, you had three exhibits, didn't you? You had two mobile phones and a computer?

A. Yes.

Q. Those three exhibits were of central importance to your investigation, weren't they?

A. Part of the investigation, yes, along with the other inquiries I have outlined.

Q. Your conclusion from your interrogation of those three exhibits, which we see at paragraph 13.2 of your concluding report, was that you are satisfied that there was:...

A. That was correct. That was my conclusion based on all of my inquiries, yes.

Q. Yes. Looking first at the exhibit we call ST/03, one of the phones that was said to have been found on Mr Perepilichnyy. You are clear now, aren't you, that whilst that SIM card in the phone that was handed to police was associated with Mr Perepilichnyy, the handset was in fact used on the day of Mr Perepilichnyy's death and prior by Mrs Perepilichnaya?

A. I wasn't now, I was aware of it then at the time, that the handset we had been given appeared to belong to Mrs Perepilichnaya.

Q. Yes, but if we look, please, at page 120 in your bundle 9, at paragraph 12.5.

A. Which bundle is it?

Q. Core bundle, is it?

A. Core bundle, is it?

MR FEAR-SEGAL: Your bundle 9, paragraph 12.5.

THE CORONER: Page 120 at the bottom.

A. Yes.

MR FEAR-SEGAL: It says there: "Examination of the iPhone 4 indicated SIM card is not the one regularly used, it appears Tatiana gave us the wrong handset. Despite several requests for the handset Tatiana would not hand it over, however this did not adversely hinder our inquiries as a lot of information was obtained from the SIM card and email accounts of Alexander."

A. The call data.

Q. Forgive me?

A. The call data.

Q. Forgive me?

A. Call data.

Q. You are incorrect in that recollection, Mr Pollard.
A. That's correct, because there is no data held on the SIM, as in content of messages, the SIM card is when you request the call data in and out, is what is off the SIM card, not data stored on the SIM card.

Q. Why did you choose the two-week period?

A. That's correct.

Q. But you only looked at the text messages for the associated with Mr Perepilichny?

Mrs Perepilichnaya's, no.

Q. You accept you have got a patchy picture for although there.

A. Yes.

Q. But you only looked at the text messages for the two-week period prior to his death?

A. That's correct.

Q. Why did you choose the two-week period?

A. I already answered that and it is recorded in my policy.

---

Q. Yes.

A. No because we -- no. I don't think we would have done.

Q. Well let's have a look at the email you wrote then, if we look in I think it is Hermitage 5.3, it is certainly the HOLMES bundles if we look at page 969 of that.

Rather if we start on 968, I think it is in 5.3.

If we look at page 968, Mr Pollard, this is a correspondence between you and Mr Barrington about looking at phones. There is quite a lot of technical information but if we look on page 969, this is an email that you have written to Nigel Jones and to Roy Barrington. You say:

"Thanks for the update. We have made the inquiry of the service provider regarding retention of voicemail messages and the recovery of them. Unfortunately they are only retained for a certain period of time and given the delay in police reacting to initial concerns of this inquiry we are out of time."

That is why I suggested if you had asked earlier you would have got them but it was because of the delay, but you didn't accept that proposition. Do you now --

Q. Yes, now I have read that. Yes, that is fair, yes.

A. Yes, I don't know the answers to why that data was not there.

Q. You accept you have got a patchy picture for although not the two weeks prior to his death but the months prior to his death?

A. Not really, I mean there was still some relevant information, quite important information, that was obtained in those two-week periods, so I don't see that as being "patchy".

Q. Yes.

You didn't get a chance to listen to the voicemails on ST/02, did you?

A. No.

Q. That was because of your delay in requesting the information, wasn't it?
Q. Yes. Can we look again at a document Mr Moxon Browne took you to which is in bundle 2, at page 723. It is the Ekaterina Clark-O'Connell report.

A. With some information relevant to Mr Perepilichnyy, yes.

Q. We will come on to that but it was the police's conclusion and I think it is your position now that this was a family computer not used as Mr Perepilichnyy's main business computer?

A. That was the inference from the examination of the computer, that he may well have had a computer — another computer but nevertheless there was obviously still some information on here that was able to inform my inquiry and conclusions.

Q. Yes. You are strengthened in your conclusion that it was not the main business computer by something of your assistants brought to your attention, that there was password saved under the title "Macbook" in one of the phone contacts, wasn't there?

A. It appeared to be a password, that's correct, yes.

Q. Mrs Clark-O'Connell finds some business transactions on the computer, doesn't she?

A. Yes, she does.

Q. Yes.

A. You said at the end of the evidence you were giving in relation to Mr Moxon Browne's questions that you had seen no evidence that Mr Perepilichnyy was in any way connected with the matters that Hermitage were raising. That was the inference from the examination of the computer, that he may well have had a computer — another computer but nevertheless there was obviously still some information on here that was able to inform my inquiry and conclusions.

Q. Yes. You are strengthened in your conclusion that it was not the main business computer by something of your assistants brought to your attention, that there was password saved under the title "Macbook" in one of the phone contacts, wasn't there?

A. It appeared to be a password, that's correct, yes.

Q. Mrs Clark-O'Connell finds some business transactions on the computer, doesn't she?

A. Yes, she does.

Q. Yes.

A. You said at the end of the evidence you were giving in relation to Mr Moxon Browne's questions that you had seen no evidence that Mr Perepilichnyy was in any way connected with the matters that Hermitage were raising on their Russian Untouchables website.

Q. Yes, I have maybe mischaracterised what you said, you have certainly said it was your position now that he had no connections to the KOCG?

A. No, what I said was the inquiries with those law enforcement and intelligence agencies did not identify any connection to the organised crime is what I said.

Q. Let me re-ask the question Mr Moxon Browne asked, because I have obviously misunderstood your answer. Is it your position now that Mr Perepilichnyy had no connections with KOCG?

Q. Yes, that is my position. I don't dispute that he was not involved in a criminal investigation, but that is vastly different from claiming that he is some member of an organised crime group the name of which is only attributable on some website called "Russian Untouchables".

Q. Mr Pollard, the question is not is he a member of a KOCG but is he connected to their dealings. I think we are getting to an answer that you now do think that he was in some way connected?

A. No, Mr Perepilichnyy, my position is he was involved as part of a criminal investigation of which he was giving evidence to the Swiss authorities on.

Q. Very good. Have a look at point 8 of what Ekaterina Clark-O'Connell raises, Mr Moxon Browne took you to it earlier, it mentions Aliando and it mentions Quartel. Those are plastered all over as the Russian Untouchable website, aren't they, as being KOCG money laundering companies?

A. As I say, I base my inquiry on evidence, not what is posted on YouTube videos which are on Russian Untouchable website or other material so I pay or take no recognition of what is on some website.

Q. What you do have evidence here is not something that is on a website, it is accounts and invoices on Mr Perepilichnyy's computer?

A. As I have said, he was involved in businesses, the full extent of those businesses I could never ascertain, which I covered in my concluding report, and all I can say is that he was involved as part of a criminal investigation, which he was assisting with in Switzerland.

Q. It is your evidence that what we have set out by Ekaterina Clark-O'Connell are business transactions and you will say no more than that about them?

A. Pardon?

Q. What we have recorded by Ekaterina Clark-O'Connell at point 8 are what you describe as business transactions and you say no more about them?

A. That's correct, yes.

Q. Can we have a look at what you did say about them in your concluding report. If we look at page 121 of your core bundle can we look at paragraph 13.2, where you are discussing the computer. What you say there is: "What was absent from this computer was any reference to his employment, business, financial transactions et cetera, indicating this was possibly a family computer."

A. No, that is not right, is it?
Day 6  Inquest into the death of Alexander Perepilichny  13 June 2017

that in my statement but there was some information on that computer, so that's correct, yes.

Q. It wasn't just some information, it was information concerning accounts of a money laundering company?

A. Well, I am not in a position to say that was a money laundering company.

Q. You are not in a position to say it but you are in a position to consider there might be a suspicion, risk or a line of inquiry that should be opened in relation to it. You are in a position to say that, aren't you?

A. No, I am not in a position to say that at all. All I am in a position to say is that there was information about business transactions or some information on his computer.

MR FEAR-SEGAL: You dropped the ball here, didn't you, Mr Pollard?

A. I didn't drop any ball, no.

Questions from MS HILL

MS HILL: Mr Pollard, as you know I ask questions on behalf of Hermitage.

I would like to ask you a couple of questions, please, about the process for certifying the scene initially as non-suspicious albeit that I know you were not involved in that. There is a couple of details I think you may be able to assist the learned coroner with.

Could I ask you to be given volume 5, page 385. Do you see that document D259?

A. Yes.

Q. Thank you. This is a document, isn't it, that refers to some research that was done for your investigation, I think by what is called the RIO team, is that right?

A. No, this was done by Detective Constable Dando on 15th -- well the report is dated 15 April.

Q. I see, but it is summarising is it not some research that has been done within the police force, that is what this report is doing, isn't it?

A. By Detective Constable Dando, yes.

Q. Yes, but what it is indicating, is this not right, is that some of these documents that are referred to under 1 and 2 on this document have been obtained by open source material, because this is material the police have found by way of their research processes. Is that right?

A. That is what this report says at the time that this was -- well, when DC Dando did that search, yes.

Q. The reason I ask you that is because if you look at the second half of this page on 385, you will see that one of the documents that the police were able to obtain was a Barron's article that dealt with the issues around the large fraud and around Mr Stepanov. Do you see that?

A. Yes.

Q. I don't know, Mr Pollard, if you were in court last week when DCI Collwood was asked questions about this and he said that had he been aware of that information, in particular that Mr Stepanov had said in the public domain, if you look over the page, there was evidence about Mr Perepilichny having sought asylum, that he was in hiding and so on, that if he had seen that Barron's article he would have classified the scene as suspicious.

From your investigation, can you confirm that that information was openly available to police officers at the time?

A. I. It has been obtained through the internet, yes, but subsequent to the night of 10 November.

Q. I understand but some questions were asked of my client that that was not classified as suspicious, the death was not classified as suspicious.

The effects of that, Mr Pollard, is that the initial classification of the scene as non-suspicious, I think that is right, isn't it?

A. Yes, it is, sir.

Q. Is this right, that we agree from your evidence last week that because the scene was not classified as suspicious there were various lines of inquiry that were not followed at that time?

A. Based on the decisions made at the time with the information that was known of the officers at the time that was not classified as suspicious, the death was not classified as suspicious.

THE CORONER: Ms Hill is just saying to you that in the light of that, that there were some lines of inquiry or some steps that were not taken because of that classification.

A. Yes, that's correct.

MS HILL: The effects of that, Mr Pollard, is that the investigation you started was already hampered was it not by certain lines not having been followed. Is that
**Day 6**

Inquest into the death of Alexander Perepilichny

13 June 2017

<table>
<thead>
<tr>
<th>Page 77</th>
<th>Page 78</th>
<th>Page 79</th>
<th>Page 80</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 A. That would be fair, yes.</td>
<td>1 me if this is right. If you look please towards the bottom of the list of bullet points on that page,</td>
<td>1 A. Yes, the estate would not allow us or the company would not allow us to -- well we had to remove the hard drives. We couldn't download it there and then because it was too complex and so forth, so we had to remove the hard drives and then issue them with replacement hard drives, which I did do at some cost.</td>
<td>20 (Pages 77 to 80)</td>
</tr>
<tr>
<td>2 Q. In particular I think we agree on these, just very briefly, from your evidence last week. There was no detailed search of the area where Mr Perepilichny's body was found, the phones were not seized and interrogated immediately, which might have captured the voicemails for example, scenes of crimes did not attend, photographs were not taken, the CCTV was not seized, house-to-house enquiries were not followed up and, as we know, the first post mortem was not a forensic one. Those are some of the evidential steps that were not followed prior to your involvement; is that right?</td>
<td>3 We obtained the hard drives from the systems to secure and preserve that evidence.</td>
<td>4 A. Yes, the estate would not allow us or the company would not allow us to remove the hard drives. We couldn't download it there and then because it was too complex and so forth, so we had to remove the hard drives and then issue them with replacement hard drives, which I did do at some cost.</td>
<td></td>
</tr>
<tr>
<td>4 Q. In fact the premise of my question about the house-to-house enquiries was that the officer who carried those out found four houses where nobody was home several hours after the death and I think the question really was that those house-to-house inquiries were not reinvigorated if you like, that there was not quite the attention given to them than there would have been if this was a suspicious scene. That is the basis of that question.</td>
<td>5 that bullet point to reflect the limitations on the CCTV that you faced?</td>
<td>5 A. Yes, I mean I wanted to seize it anyway, but yes, I was aware that some or all -- some of the footage may have been overwritten or all of it but I still nevertheless felt it necessary to seize the hard drives in any event.</td>
<td></td>
</tr>
<tr>
<td>5 A. I understand that, yes.</td>
<td>5 Q. The point is this, it is not, that this court, this coroner, is not able to be helped by CCTV because of those issues in the early days of the investigation. That is right, isn't it?</td>
<td>6 A. That's correct.</td>
<td></td>
</tr>
<tr>
<td>6 Q. Just in relation to the CCTV, because I don't think the learned coroner has heard very much about this and forgive me because the evidence is a little unclear about this, do you know now that Paul Scott from the estate security had been in touch with officers very early on raising the issue of CCTV and saying it was only going to be kept for seven days? Do you know now that that is what happened in the very early days of the inquiry?</td>
<td>7 A. It is the hypothetical one which is simply this. That is the</td>
<td>7 Q. From your many years of experience, Mr Pollard, it must follow, mustn't it, that the early days of investigating a crime are in some cases the most important?</td>
<td></td>
</tr>
<tr>
<td>7 A. I think that was covered in DC Burden's report as I believe, and obviously when I became involved we went straight there as one of the fast track actions to try and recover the CCTV.</td>
<td>8 A. Well, they are, but obviously the decisions made on the night were based on information that was known to those officers, and so that is how they reached their decisions. So what then comes afterwards clearly took us down a different route but that was the decision made on the night which is why that evidence wasn't obtained on the night. Or in the days -- or immediate days after.</td>
<td>9 Q. Mr Pollard, I am not asking you to explain the actions of other officers, my question to you was a deliberately hypothetical one which is simply this. That it is the</td>
<td></td>
</tr>
<tr>
<td>8 Q. Again, could you be given, please, miscellaneous bundle, page 41. It looks like Mr Suter is coming to your aid, Mr Pollard. You have two copies of it now. Can you see at page 41 of the miscellaneous bundle an email exchanged dealing with the CCTV. Again, help</td>
<td>9 Q. Is this right, Mr Pollard, just looking at the bullet point I think fourth from the bottom on this page that begins, &quot;By the time ...&quot; Can you see that? I will just read it out. What the email from Officer Justin Pollard says is this: &quot;By the time the CCTV engineers were able to swap out the hard drives, it is believed all footage for the 10 November 2012 had been overridden.&quot; There is some evidence it appears elsewhere of some officers looking at some CCTV, but do you understand</td>
<td>10 A. Yes, it is the CCTV engineers were able to swap out the hard drives, it is believed all footage for the 10 November 2012 had been overridden.&quot; There is some evidence it appears elsewhere of some officers looking at some CCTV, but do you understand</td>
<td></td>
</tr>
</tbody>
</table>

**DTI**

www.DTIGlobal.com

8th Floor, 165 Fleet Street

London EC4A 2DY

(+44)207 4041400
case, is it not, that in many investigations -- of which you have conducted many I am sure -- those early days of an investigation can be crucial. That is right, isn't it?

A. That's correct. The early days of an investigation where they are suspicious are important days, that's correct.

Q. Evidence can easily be lost if it is not preserved immediately?

A. It can be in some cases, yes.

Q. In particular if there are people who have an incentive to destroy evidence, they have an opportunity to do so if those early days are not managed rigorously. That is right, isn't it?

A. In some cases, yes, that would be correct.

Q. It must follow, Mr Pollard, must it not, that by the time you became involved, I think 17 days after this man's death, there is the potential that crucial evidence, in addition to the CCTV and those lines of inquiry I have set out already, had been lost?

A. In respect of what?

Q. Well, in principle what I am asking you to agree with this is this proposition, that because those early days of investigation are so important, you don't know what evidence may have gone missing in those first 17 days?

MS HILL: Thank you, sir.

THE CORONER: Thank you.

(12.40 pm)

(The Luncheon Adjournment)

(1.55 pm)

MS HILL: Mr Pollard, I would just like to go back if I may and ask you one question I should have put to you before lunch. Could I ask you to go to bundle 1, page 22.

A. This is the Barron's article that was put to Inspector Collwood last week, 31 May 2011. Can you have a look at that article and in particular look at the bottom of page 22, where Mr Stepanov is quoted as saying that Stepanov blames his unsought stardom and financial exposure on Mr Perepilichny, who Stepanov says is hiding in London and owes money to Stepanov and others."

Q. Over the page, on 23, just below the second hole can you see this: "Alexander Perepilichny, this man owes me a lot of money, as a matter of fact not only to me but also to scores of other creditors, he cheated me by pocketing my money and assets."

A. That's correct. The early days of an investigation that you inherited was hampered by the failings in those early days?

Q. I would like to move on now to ask you questions --

THE CORONER: Ms Hill, today is one of those days when we could break off now and start again at 1.45, if that is all right.

MS HILL: Thank you, sir.

THE CORONER: Again, as usual you won't talk to anybody about your evidence in the break.

A. No, sir.

THE CORONER: Thank you.

(1.45 pm)

THE CORONER: Thank you.

(1.55 pm)

THE CORONER: Thank you.

Q. Well, in principle what I am asking you to agree with this is this proposition, that because those early days of investigation are so important, you don't know what evidence may have gone missing in those first 17 days?

THE CORONER: Again, as usual you won't talk to anybody about your evidence in the break.

A. No, sir.

THE CORONER: Thank you.

A. If that was known at the time, then that would have warranted further examination of the case and yes, most probably would have resulted in a forensic post mortem being undertaken.

Q. Thank you.

A. If that was known at the time, then that would have warranted further examination of the case and yes, most probably would have resulted in a forensic post mortem being undertaken.

Q. Thank you.
<table>
<thead>
<tr>
<th>Page 85</th>
<th>Page 86</th>
<th>Page 87</th>
</tr>
</thead>
<tbody>
<tr>
<td>understand that various people, various lawyers, had</td>
<td>Q. When you came to understand that all these lawyers had</td>
<td>better to have dealt with it sooner rather than later.</td>
</tr>
<tr>
<td>approached Surrey Police independently to alert the</td>
<td>made contact with Surrey Police and expressed concerns</td>
<td>Yes, that would be fair.</td>
</tr>
<tr>
<td>police to concerns about this man's death?</td>
<td>about the death, it must be right, mustn't it, that you</td>
<td>Q. I would like to ask you some questions now about some of</td>
</tr>
<tr>
<td>A. Yes, that's correct.</td>
<td>would have been concerned that those letters and calls</td>
<td>the lines of inquiry you pursued. I will try not to</td>
</tr>
<tr>
<td>Q. Just to summarise it, and perhaps to assist the learned</td>
<td>had not been actioned by Surrey Police?</td>
<td>repeat ground covered by my learned friends, so perhaps</td>
</tr>
<tr>
<td>coroner in putting it together, the first of those</td>
<td></td>
<td>I can take this relatively briefly.</td>
</tr>
<tr>
<td>contacts was from a lawyer called Mr Gherson -- perhaps</td>
<td>A. Well, that was part of the gold group, to look at those</td>
<td>Dealing first with the evidence of</td>
</tr>
<tr>
<td>let me put it to you this way, fairly if I may,</td>
<td>circumstances but yes, I mean they should have been</td>
<td>Mr Perepilichny's final movements in the UK. Dealing</td>
</tr>
<tr>
<td>Mr Pollard, sorry, it is my fault.</td>
<td>followed up and progressed sooner without waiting for</td>
<td>with that issue, please, first, Mr Pollard, your</td>
</tr>
<tr>
<td>Mr Gherson made contact with the police, there is</td>
<td>Mr Raab to contact Surrey Police. Yes, I agree.</td>
<td>inquiries have given the coroner some sense of</td>
</tr>
<tr>
<td>some evidence that was on 16 November, and some evidence</td>
<td>Q. You are quite right to indicate to the coroner, I am</td>
<td>Mr Perepilichny's final movements. What we don't have,</td>
</tr>
<tr>
<td>that was on 18 November, so on either of those days,</td>
<td>sure for his note he has it but the gold group minutes</td>
<td>do we, are clear examples of witness accounts from</td>
</tr>
<tr>
<td>a lawyer called Mr Gherson made contact with the police,</td>
<td>at volume 2, 578/7 indicate there had been some missed</td>
<td>people who saw him on that last day. Apart from some</td>
</tr>
<tr>
<td>is that right?</td>
<td>opportunities in those early days, didn't they?</td>
<td>brief evidence from his wife there is no evidence, is</td>
</tr>
<tr>
<td>A. Yes, he did make contact.</td>
<td>A. It was not picked up sooner. Yes, that's correct.</td>
<td>there, of people who may have seen him at the gym,</td>
</tr>
<tr>
<td>Q. After that, or at around that time, on 17 November,</td>
<td>Q. It must follow from your earlier evidence, Mr Pollard,</td>
<td>people who may have seen him at the shops that he went</td>
</tr>
<tr>
<td>Hermitage made contact with a letter from their lawyers,</td>
<td>that if your investigation had been triggered at any one</td>
<td>to with his daughter or any evidence from his daughter.</td>
</tr>
<tr>
<td>didn't they?</td>
<td>of those points when a contact was made by a lawyer,</td>
<td>That is right, isn't it?</td>
</tr>
<tr>
<td>A. Yes.</td>
<td>then your investigation would have started earlier than</td>
<td>A. Well, it went on for longer, yes, it would have been</td>
</tr>
<tr>
<td>Q. There was then, was there not, as far as you understand</td>
<td>it did. That must be right, mustn't it?</td>
<td>to tick, wasn't it?</td>
</tr>
<tr>
<td>it from the log, a telephone call from Mr Gherson, that</td>
<td>A. Yes, that would be correct.</td>
<td></td>
</tr>
<tr>
<td>was the third such contact?</td>
<td>Q. It is fair to assume, isn't it, that throughout this</td>
<td></td>
</tr>
<tr>
<td>A. Yes.</td>
<td>time when lawyers are making contact and Surrey Police</td>
<td></td>
</tr>
<tr>
<td>Q. On 21 November. There was then the fourth such contact,</td>
<td>were not responding the evidential clock was continuing</td>
<td></td>
</tr>
<tr>
<td>a call from Peters &amp; Peters lawyers on 22 November, do</td>
<td>to tick, wasn't it?</td>
<td></td>
</tr>
<tr>
<td>you know about that?</td>
<td>A. That is what started it, yes, that's correct.</td>
<td></td>
</tr>
</tbody>
</table>
Day 6  Inquest into the death of Alexander Perepilichny  13 June 2017

Page 90

1. apart from what you have from Mrs Perepilichnyy, there
2. no direct witness evidence of people having had contact
3. with him during the day, is there?
4. A. No.
5. Q. I think it is right, isn't it, that you didn't conduct
6. a detailed analysis of the visitor logs and the car
7. registration logs on to the estate, did you?
8. A. We seized those to secure them. But actually it would
9. be like looking for a needle in a haystack without
10. knowing what to look for, so -- but they were seized and
11. preserved in the event that we may have required or it
12. may have been necessary to revisit them.
13. Q. Could I ask you to turn up, please, the miscellaneous
14. bundle, please, page 84.
15. A. Yes.
16. Q. I will just wait for the learned coroner to find the
17. page.
18. THE CORONER: What is it going to be --
19. MS HILL: 84, sir, an email.
20. THE CORONER: Yes.
21. MS HILL: Just to help the coroner with this understanding,
22. Mr Pollard, this is right, isn't it, that the estate on
23. which Mr Perepilichny lived and died had security at
24. which people had to report as they entered the estate,
25. so the logs in question -- we don't have them, they are

Page 91

1. automatic number plate retrieval, so you have to have
2. a number relevant to search for to put in the system.
3. And similarly with names of people entering or not, you
4. know, entering and leaving, you have to have a start
5. point as to who you may be looking for, so yes that is
6. why they were not examined but we did seize and secure
7. them.
8. Q. Surrey Police must have the ability to know from its
9. computer records whether particular cars or particular
10. number plates are associated with criminals, I mean that
11. is presumably part of your intelligence function, isn't
12. it?
13. A. Well had there been any information of that nature, but
14. there wasn't.
15. Q. The point I am making is that you do have the ability on
16. seeing a list of number plates to check that against
17. your intelligence to see whether they are of interest in
18. any way, don't you?
19. A. There is that ability, yes, if there is a number to look
20. for.
21. THE CORONER: Sorry, can you just help me with this, what
22. does the log show, does it show a registration number if
23. a car's gone through -- ANPR I am thinking of something
24. rather different.
25. A. There is that, the ANPR.

Page 92

1. many hundreds of pages -- show people reporting to
2. security, don't they?
3. A. Yes, as I understand it, yes, that's correct.
4. Q. There is also technology that somehow records
5. registration plates and things of that nature; isn't
6. there?
7. A. Yes.
8. Q. What is said on page 84 of the miscellaneous bundle is
9. this, isn't it, that one question we had asked is
10. whether those material logs had been reviewed and as is
11. said at page 84: "Surrey Police have now confirmed that the visitor
12. and incident logs were seized at the time of the inquiry
13. to ensure it was secured in the event that it may have
14. been necessary to examine it, but because there was no
15. evidence to support the fact that Mr Perepilichny had
16. been murdered those logs were not examined."
17. A. That's correct.
18. Q. Does this line of inquiry fit with some of the other
19. lines of inquiry where your argument is along these
20. lines, "Until I had proof there had been a murder,
21. I didn't think it was appropriate to follow that line of
22. inquiry"?
23. A. Well that would be -- yes, that is correct, because
24. actually what am I looking for? So the point of ANPR is

24 (Pages 89 to 92)
### Day 6  
**Inquest into the death of Alexander Perepilichny**  
13 June 2017

<table>
<thead>
<tr>
<th>Page 93</th>
<th>Page 94</th>
<th>Page 95</th>
<th>Page 96</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>A. Because you are a pedestrian.</strong></td>
<td><strong>A. No, my understanding is it is a written book.</strong></td>
<td><strong>A. No, I don't think it would be impossible at all.</strong></td>
<td><strong>A. No, I don't know if it was all vehicular access but there are certainly eight points on the estate, yes.</strong></td>
</tr>
<tr>
<td>THE CORONER: It won't log that.</td>
<td>THE CORONER: Hold on, so if you are a resident, does anybody bother -- if I live there, and I've got a fob for the key and I just go through, does anybody bother to ask me who I am or do they just work on the basis if I am a resident I come and go as I please?</td>
<td>THE CORONER: Okay, hold on.</td>
<td>THE CORONER: Okay, hold on.</td>
</tr>
<tr>
<td><strong>A. Yes, that is my understanding, sir.</strong></td>
<td><strong>A. That is my understanding, sir, yes.</strong></td>
<td><strong>A. Yes, yes.</strong></td>
<td><strong>A. Yes, yes.</strong></td>
</tr>
<tr>
<td>THE CORONER: Okay.</td>
<td>THE CORONER: Again in that instance, if it is automatic, just as if I am a resident with a fob, the car goes through -- the resident's car goes through, does it bother to make a record of that? Obviously it recognises it is the resident's car, but does it bother to --</td>
<td>MS HILL: Of course, sir.</td>
<td>MS HILL: Of course, sir.</td>
</tr>
<tr>
<td><strong>A. My understanding, I think that would be stored on the ANPR system, would be my understanding.</strong></td>
<td><strong>A. That's how I understand it, at the security gate, yes.</strong></td>
<td><strong>A. No.</strong></td>
<td><strong>A. No.</strong></td>
</tr>
<tr>
<td>THE CORONER: Okay, hold on.</td>
<td>MS HILL: It is a handwritten record, I believe, sir, we have copies of it. It is not in the bundle but somebody who is arriving as the learned coroner is asking as a non-resident also has to indicate, don't they, who they are visiting. I think that is right, isn't it?</td>
<td>THE CORONER: Equally, I mean everybody still bothers to lock their doors if they live on the estate -- it is not that secure, is it?</td>
<td>THE CORONER: Equally, I mean everybody still bothers to lock their doors if they live on the estate -- it is not that secure, is it?</td>
</tr>
<tr>
<td><strong>A. I believe so.</strong></td>
<td><strong>A. I believe so.</strong></td>
<td><strong>A. Yes.</strong></td>
<td><strong>A. Yes.</strong></td>
</tr>
<tr>
<td>Q. We can furnish you with a couple of examples, sir, if that would help.</td>
<td>Q. We can furnish you with a couple of examples, sir, if that would help.</td>
<td>MS HILL: Of course, sir.</td>
<td>MS HILL: Of course, sir.</td>
</tr>
<tr>
<td>THE CORONER: Help me, otherwise to get on the estate, because I haven't really got a sense of this, obviously there are various levels of security, I am assuming it is not like a prison?</td>
<td>THE CORONER: Help me, otherwise to get on the estate, because I haven't really got a sense of this, obviously there are various levels of security, I am assuming it is not like a prison?</td>
<td>THE CORONER: Because if they don't -- well, yes, all right.</td>
<td>THE CORONER: Because if they don't -- well, yes, all right.</td>
</tr>
<tr>
<td><strong>A. No.</strong></td>
<td><strong>A. No.</strong></td>
<td><strong>A. No.</strong></td>
<td><strong>A. No.</strong></td>
</tr>
<tr>
<td>THE CORONER: Equally, I mean everybody still bothers to lock their doors if they live on the estate -- it is not that secure, is it?</td>
<td>THE CORONER: Equally, I mean everybody still bothers to lock their doors if they live on the estate -- it is not that secure, is it?</td>
<td>MS HILL: Some vehicles are known and some are not known but comparison was never done so we will don't know what the fruits may have been.</td>
<td>MS HILL: Some vehicles are known and some are not known but comparison was never done so we will don't know what the fruits may have been.</td>
</tr>
<tr>
<td><strong>A. Sir, it is a massive -- some houses have gates in front of them and so forth but yes, so --</strong></td>
<td><strong>A. Sir, it is a massive -- some houses have gates in front of them and so forth but yes, so --</strong></td>
<td><strong>A. Moving then if I may to Mr Perepilichnyy's final movements in France, so backing up a little bit in time.</strong></td>
<td><strong>A. Moving then if I may to Mr Perepilichny's final movements in France, so backing up a little bit in time.</strong></td>
</tr>
<tr>
<td>THE CORONER: What is there some kind of perimeter, how does it work? Do you know?</td>
<td>THE CORONER: What is there some kind of perimeter, how does it work? Do you know?</td>
<td>MS HILL: This is the position I think isn't it, Mr Pollard on your evidence, that you obtained some information by email about his movements in France. That's right, isn't it?</td>
<td>MS HILL: This is the position I think isn't it, Mr Pollard on your evidence, that you obtained some information by email about his movements in France. That's right, isn't it?</td>
</tr>
<tr>
<td><strong>A. No, not in its entirety, no but it obviously has 24-hour security and security at the main vehicular entrances and so forth.</strong></td>
<td><strong>A. No, not in its entirety, no but it obviously has 24-hour security and security at the main vehicular entrances and so forth.</strong></td>
<td><strong>A. Yes, that's correct.</strong></td>
<td><strong>A. Yes, that's correct.</strong></td>
</tr>
<tr>
<td>THE CORONER: If somebody wanted to get into the estate without going through the barrier, I mean is that just unthinkable because it would be impossible or --</td>
<td>THE CORONER: If somebody wanted to get into the estate without going through the barrier, I mean is that just unthinkable because it would be impossible or --</td>
<td>Q. In fact if we turn up please volume 2, page 470.</td>
<td>Q. In fact if we turn up please volume 2, page 470.</td>
</tr>
</tbody>
</table>

---

**Page 93**

1. A. Because you are a pedestrian.
2. A. No, my understanding is it is a written book.
3. A. Yes, that is my understanding, sir.
4. THE CORONER: Again in that instance, if it is automatic, just as if I am a resident with a fob, the car goes through -- the resident's car goes through, does it bother to make a record of that? Obviously it recognises it is the resident's car, but does it bother to --
5. A. My understanding, I think that would be stored on the ANPR system, would be my understanding.
6. THE CORONER: Okay, hold on.
7. If you are not a resident and you are either on foot or in a car, somebody makes a record of it do they in theory?
8. A. That's how I understand it, at the security gate, yes.
9. MS HILL: It is a handwritten record, I believe, sir, we have copies of it. It is not in the bundle but somebody who is arriving as the learned coroner is asking as a non-resident also has to indicate, don't they, who they are visiting. I think that is right, isn't it?
10. A. I believe so.
11. Q. We can furnish you with a couple of examples, sir, if that would help.
12. THE CORONER: Help me, otherwise to get on the estate, because I haven't really got a sense of this, obviously there are various levels of security, I am assuming it is not like a prison?
13. A. No.
14. THE CORONER: Equally, I mean everybody still bothers to lock their doors if they live on the estate -- it is not that secure, is it?
15. A. Sir, it is a massive -- some houses have gates in front of them and so forth but yes, so --
16. THE CORONER: What is there some kind of perimeter, how does it work? Do you know?
17. A. No, not in its entirety, no but it obviously has 24-hour security and security at the main vehicular entrances and so forth.
18. THE CORONER: If somebody wanted to get into the estate without going through the barrier, I mean is that just unthinkable because it would be impossible or --

---

**Page 94**

1. A. No, I don't think it would be impossible at all.
2. You know, I think if you were determined to get in then I think there would be ways where you could do that.
3. THE CORONER: Sorry, Ms Hill.
4. MS HILL: Not at all. If it helps you, sir, we do know from volume 5, page 10, Mr Pollard you gathered this evidence, didn't you, that I think there are eight different entrances to the estate that allow vehicles in and each of those has its own CCTV and things of that nature. So there are eight different ways in which cars can get on to the estate, aren't there?
5. A. Yes, I don't know if it was all vehicular access but there are certainly eight points on the estate, yes.
6. Q. I am just reading out from the statement that your investigation gathered, Paul Scott says, at page 10 of volume 5: "There are eight entrances which allow vehicular access, one entrance is pedestrians only, two vehicle entrances are padlocked closed."
7. That gives the coroner perhaps some sense of it.
8. That is page 10 of volume 5.
9. The point for your investigation, officer, is that that comparison of the logs with any known criminals or indeed any members of the KOCG was not done, was it?
10. A. No.
11. Q. In relation to --
12. THE CORONER: I mean assuming somebody who was up to no good and indeed any members of the KOCG was not done, was it?
13. A. No.
14. Q. Moving then if I may to Mr Perepilichnyy's final movements in France, so backing up a little bit in time. This is the position I think isn't it, Mr Pollard on your evidence, that you obtained some information by email about his movements in France. That's right, isn't it?
15. A. Yes, that's correct.
16. Q. In fact if we turn up please volume 2, page 470.

---

**Page 95**

1. A. Yes, yes.
2. MS HILL: Of course, sir.
3. THE CORONER: Because if they don't -- well, yes, all right.
4. MS HILL: Some vehicles are known and some are not known but comparison was never done so we will don't know what the fruits may have been.
5. A. No.
6. Q. Moving then if I may to Mr Perepilichnyy's final movements in France, so backing up a little bit in time.
7. This is the position I think isn't it, Mr Pollard on your evidence, that you obtained some information by email about his movements in France. That's right, isn't it?
8. A. Yes, that's correct.
9. Q. In fact if we turn up please volume 2, page 470.
THE CORONER: Sorry, Ms Hill, you just gave a page reference and I was making a note -- what page?

MS HILL: Volume 2, page 470.

THE CORONER: Thank you.

MS HILL: This is the regional organised crime unit notification is it not Mr Pollard where you sent a request to a man called Mr Wiseman, who was the SLO in Paris. The request is the italics on page 470, isn't it?

A. Yes.

THE CORONER: Broadly speaking?

MS HILL: It is clear from that documentation, isn't it?

A. That's correct.

THE CORONER: Yes, all right.

MS HILL: On 478, sir, in the middle of the page.

THE CORONER: I see.

MS HILL: Yes, I think separately inquiries were made, this was on an intelligence only basis at that time but not as it was only retained for a standard seven days and so was not available to Mr Pollard, is that right?

A. That's correct, sir.

THE CORONER: That is what you were being told, it was not just you thinking that, you were being told that that was required?

A. Yes, if the context around that was around hosts will not undertake forensic examinations without an ILOR, anything further was needed from the French, an ILOR, international letter of request, is what was required and you explained why you didn't consider that appropriate, officer?

A. Yes, that's correct and that is why I explained that earlier, yes.

THE CORONER: Ms Hill, where is that?

MS HILL: On 478, sir, in the middle of the page.

THE CORONER: I see.

MS HILL: I think the SOCA liaison officer, Mr Wiseman, is saying: "Hosts [ie local officers] will not undertake forensics without an ILOR."

THE CORONER: That is what you were being told, it was not just you thinking that, you were being told that that was required?

A. Yes, if the context around that was around hosts will not undertake forensic examinations without an ILOR and then obviously my decision was later informed after the meeting on 17 December that I would not need to examine or conduct forensic inquiries in Paris, based on the advice I was given by the experts on 17 December.

MS HILL: It is clear from that documentation, isn't it officer, that you asked specific questions about the Hotel Bristol, because that is where you had understood

A. Yes, that's correct.

THE CORONER: Broadly speaking?

THE CORONER: Can I just ask this, because we are on to looking on. When you were just speaking earlier about the two versions of the timeline, have I understood it right that as far as, as it were, at one point some extra information is concerned, I think you said you had had that on an intelligence basis, is that right at that stage?

THE CORONER: Thank you.

MS HILL: Yes, that's correct.

THE CORONER: Broadly speaking?

THE CORONER: Ms Hill, sorry you just said that -- is it on this page too? Inquiries of the hotel about CCTV, and you just said something about an inquiry of a lady but

A. Yes.

THE CORONER: Some financial transactions from a financial company.

THE CORONER: Yes, all right. But as it were on an intelligence only basis at that time but not as it were an evidential form at that point, so that is the reason for that. Do I have it right?

A. Yes.

Page 100
Day 6 Inquest into the death of Alexander Perepilichny | 13 June 2017

1. That Mr Perepilichny had stayed with the female in question. Is that right?

2. A. That's correct.

3. Q. Without labouring the point too much, I think to assist the learned coroner, we did go to look at some of the credit card receipts around the hotel visits. I think for your note, sir, it is bundle 5, page 257 and, sir, you asked me the question, which was the most expensive of the transactions of hotels and I am afraid I misled you, sir, inadvertently because in fact one can see that the most expensive hotel is on the following page, so it is still a figure of over £1,000 or euros if I remember correctly -- I don't remember what the figure was exactly.

4. I will find the exact reference for you but you did find a substantial transaction to that hotel, is that right? To the Hotel Bristol?

5. A. Not to the hotel -- I thought the substantial transaction was a €1,500 purchase of a Prada bag.

6. Q. Forgive me, in terms of hotels only, if you look on page 257 of bundle 5 -- sir, do you want to pull this up while we are dealing with this aspect of the evidence.

7. THE CORONER: It just slightly depends where it is. If Seasons or the Crillon, are you saying that they were definitely ones where food reservations had been made?

8. MS HILL: Bundle 5, page 257.

9. Q. The learned coroner asked what the most substantial transaction for hotels, over the page there is a transaction for £1,871 at the Hotel Bristol, yes?

10. A. Where he was staying, yes.

11. Q. There are, are there not, various other mentions of hotel expenditure of some sort?

12. A. But not at that level, I think they are in the hundreds of pounds for two people. Most of the transactions are primarily food reservations for two people.

13. THE CORONER: Yes.

14. MS HILL: Just passing there, officer, you knew from email transactions that Mr Perepilichny had made some reservations for dinner or lunch I think at different places, didn't you?

15. A. Yes.

16. Q. Insofar as what was happening at the Fouquet, the Four Seasons or the Crillon, are you saying that they were definitely ones where food reservations had been made?

17. A. Well, again, without seeing -- I don't know but at my --

18. is what the apparent transactions show.

19. Q. We can no doubt marry them up but I am not sure that there is clear evidence that they were definitely relating to food but is that what your --

20. A. Or purchases but I mean they were not significant amounts, I mean they were just credit card transactions.

21. Q. All right.

22. You will no doubt have seen, officer, reports in the press late last night about this case, you are familiar with the Buzzfeed report from last night, are you?

23. A. No, I didn't -- I haven't read the Buzzfeed report.

24. Q. That report suggests the French authorities had tried to secure assistance from the British police authorities --

25. I will just read it out to you so you can answer it, it says here:

26. "In France authorities have designated a suspected organised assassination [it is said].

27. French police have tried to investigate whether Perepilichnyy was poisoned during his visit to Paris but four senior French law enforcement officials said British authorities have repeatedly frustrated those efforts. It is said the death was not suspicious and the Paris police should await the outcome of this coroner's inquest."

28. Have you refused to give assistance to the French police, officer?

29. A. I have not had any contact with the French authorities making that request of me.

30. THE CORONER: Who is the French policeman who says this?

31. MS HILL: It is simply said I read it out verbatim.

32. THE CORONER: The name of the officer, that is what will help otherwise it is these things are --

33. MS HILL: It simply says French police, I am afraid, that is all it says.

34. We do know don't we, officer, that the French themselves had initially made contact with your investigation of their own volition before you tried to make inquiries about the Hotel Bristol, hadn't they?

35. A. Not that I recall. I thought the inquiry was instigated at our request when we knew that he was staying in Paris, as I recall.

36. Q. If you look, please, at bundle 5, let me see if I can get the correct reference here, bear with me a second, bundle 5, I think I have page 135. That may not be correct. Just bear with me a second.

37. This was a request from the French authorities, let me get a proper citation for you, just bear with me.

38. Forgive me, I will come back to a proper reference for that but you have no recollection of being contacted by the French at the beginning of your investigation?
<table>
<thead>
<tr>
<th>Q.</th>
<th>A.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Can I ask you now some questions, please, about your investigation's contact with Mr Perepilichnyy's widow, with Mrs Perepilichnaya. You came to understand fairly early on, didn't you, that she had fed him his last meal at lunchtime and he had died in the afternoon?</td>
<td>Yes.</td>
</tr>
<tr>
<td>The -- what Skype translations and text messages and emails were available within that two-week timeframe were translated.</td>
<td>Yes, but you yourself are not standing here now, are you, with a detailed understanding of what those Skype messages said line by line?</td>
</tr>
<tr>
<td>What, in the two-week period?</td>
<td>Not all of the Skype messages, no.</td>
</tr>
<tr>
<td>No, generally, well beyond the two-week period, you yourself don't have a detailed understanding of the Skypes because your investigation did not translate them line by line, did it?</td>
<td>No. An officer looked at the Skypes and came to you and said, &quot;I think these are of interest&quot;. That is how it worked, isn't it?</td>
</tr>
<tr>
<td>The -- what Skype translations and text messages and emails were available within that two-week timeframe were translated.</td>
<td>They translated the various correspondence in that two-week timeframe.</td>
</tr>
<tr>
<td>You were not aware, were you, from the Skype translations that there was evidence within those Skype messages that Mrs Perepilichnaya's brother had been interrogated and it was perceived to have gone badly, and I quote that from the messages, that is not something you were aware of, is it?</td>
<td>They translated the various correspondence in that two-week timeframe.</td>
</tr>
<tr>
<td>Do you now know that that was something that features on the Skype messages?</td>
<td>You now know I think, do you, that the understanding is, others may disagree, but there is an understanding, certainly within our team, that the person who is saying that the interrogation of Mrs Perepilichnaya's brother had gone badly was Andrei Pavlov, the lawyer for the KOCG. That is what is said on the messages, isn't it?</td>
</tr>
<tr>
<td>Having read them subsequently, yes.</td>
<td>The content talks about the interrogation and obviously the sender of that correspondence is the Skype ID of News Rus.com, yes.</td>
</tr>
<tr>
<td>Yes, and that there a basis to suggest that that News Rus.com address is Andrei Pavlov so at its highest that is what the Skype may suggest?</td>
<td>That is what is said on the messages, isn't it?</td>
</tr>
<tr>
<td>That that may belong to Andrei Pavlov, yes.</td>
<td>That may belong to Andrei Pavlov, yes.</td>
</tr>
<tr>
<td>And that he was in communication with Mr Perepilichnyy in late November 2011 expressing concern that the interrogation of Mrs Perepilichnaya's brother had gone badly?</td>
<td>Well, there was a sequence of Skype message that started on 4 September with -- between Mr Perepilichnyy and the Skype ID address. So they ran through a theme and I think the last correspondence was on 21 or 22 November, but after that particular message, there was then some rectifying of that by Mr Perepilichnyy on reading those Skypes and the matter appeared to then have been resolved.</td>
</tr>
<tr>
<td>Yes, but you yourself are not standing here now, are you, with a detailed understanding of what those Skype messages said line by line?</td>
<td>But you have to look at it in its entirety, not just to the soundbites of certain individual Skype message.</td>
</tr>
<tr>
<td>Have you read Mr Browder's second statement?</td>
<td>Have you read the recent statement Mr Ismagilov makes a range of allegations against Mr Browder along the lines of the fact that he is a spy or that he has been involved in the death of a business colleague, things of that nature, do you know about?</td>
</tr>
<tr>
<td>Have you read the recent statement Mr Ismagilov put before this court?</td>
<td>Yes, that yes, sort of similar allegations made the other way against Mr Perepilichnyy and other people, yes.</td>
</tr>
<tr>
<td>Have you been made aware of Mr Browder's evidence that those allegations made by Mr Ismagilov, Mrs Perepilichnaya's brother, are identical to ones that are made against him by the Russian government?</td>
<td>Have you been made aware of Mr Browder's evidence that those allegations made by Mr Ismagilov, Mrs Perepilichnaya's brother, are identical to ones that are made against him by the Russian government?</td>
</tr>
<tr>
<td>To be honest, I haven't paid too much attention to the tattle tattle of those exchanges, frankly.</td>
<td>It is not tattle tattle. It is my client's evidence under oath, that is what he said. He said that there is a concern that he has that those allegations made against him by Mr Ismagilov mirror those that the Russian government make against him and he has said in terms he has concerns that Mr Ismagilov is acting under the direction of the Russian state. You know that, don't you?</td>
</tr>
<tr>
<td>I don't know that, but I am --</td>
<td>I don't know that, but I am --</td>
</tr>
<tr>
<td>You know that from his evidence, officer?</td>
<td>You know that from his evidence, officer?</td>
</tr>
<tr>
<td>only read what Mr Ismagilov said and I didn't hear all</td>
<td>only read what Mr Ismagilov said and I didn't hear all</td>
</tr>
<tr>
<td>A. Sorry, what was the page number again, please?</td>
<td>Q. You have on various occasions in your evidence been asked questions about certain issues to do with the life insurance and the mortgage and so on, haven't you?</td>
</tr>
<tr>
<td>------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Q. In fact I think a better reference that is clearer is page 982 of volume 5.</td>
<td>A. Yes.</td>
</tr>
<tr>
<td>I think it will be in the later part of the volume 5, sir.</td>
<td>A. You know that the life insurance policies were for a mortgage. You don't know that, do you, officer?</td>
</tr>
<tr>
<td>Thank you.</td>
<td>A. As I understand -- I thought that was from Mrs -- a statement that Mrs Perepilichnaya later gave to the coroner at Woking, some time after clearly. That is my recollection.</td>
</tr>
<tr>
<td>Do you have a document headed &quot;Family liaison officer strategy&quot; at page 982?</td>
<td>Q. That is her position, but that is only one side of the evidence, isn't it? Do you know that the insurance evidence could be read as suggesting something different, that this was not about mortgage protection but about family protection. You know that that is another part of the evidence for the coroner to hear, don't you?</td>
</tr>
<tr>
<td>A. Yes.</td>
<td>A. Well I was not here when the insurers gave evidence so I don't know.</td>
</tr>
<tr>
<td>Q. Do you see over the page the objectives of the strategy, at page 983, are partly to provide information and support to the family and so on?</td>
<td>Q. Can I ask you to look at the communications timeline, which is a document that looks like this. (Indicates) Which I hope is in the witness bundle, it was handed out last week, it should be on the witness table somewhere and if not we can give you -- I see Mr Suter</td>
</tr>
<tr>
<td>A. Yes.</td>
<td></td>
</tr>
<tr>
<td>Q. Do you see that, &quot;To secure the confidence and trust of the family&quot;?</td>
<td></td>
</tr>
<tr>
<td>A. Yes.</td>
<td></td>
</tr>
<tr>
<td>Q. &quot;Provide them with information&quot;, but also, if you look on 984, please, the top two bullet points on that page: &quot;To obtain information about his movements, and whether he complained of feeling unwell, et cetera. &quot;To determine whether the family had received any threats and in particular whether he had or whether his routines and behaviour had changed. &quot;To keep under constant review whether they had received any threats and whether there was a security need and so on.</td>
<td></td>
</tr>
</tbody>
</table>

| Day 6 Inquest into the death of Alexander Perepilichny  13 June 2017 | | |
|------------------------------------------------------------------|-------------------------|
| Q. I am his lawyer and I am putting to you that that is what is in his signed statement that he approved under oath. Are you not willing to accept what I am putting to you, that that is what his evidence is, whether you like it or not or agree with it or not, that is what his evidence was? | A. If that's -- yes, that's fine, if it is his evidence, yes. |
| A. You accept, I think, don't you, that the role of the FLOs was not only to support her, but also to gather evidence for your inquiry? | A. Yes. |
| Q. If the coroner needs a reference for that, one can see in the FLO strategy document, let me just pull up the reference for you, if you look, please, at volume 5, I think it is page 235, it may be 285 -- sorry, it has not copied terribly well, I think it is 235, please, of volume 5. | |
| A. Yes. | |
| Q. In terms of the contact that Surrey Police had with Mrs Perepilichnaya, is this right, that the focus was on giving her FLO support but that that had also an investigative function? | A. Yes. |
| Q. If the coroner needs a reference for that, one can see in the FLO strategy document, let me just pull up the reference for you, if you look, please, at volume 5, I think it is page 235, it may be 285 -- sorry, it has not copied terribly well, I think it is 235, please, of volume 5. | A. Yes. |
| A. You accept, I think, don't you, that the role of the FLOs was not only to support her, but also to gather evidence for your inquiry? | A. Yes. |
| Q. In terms of the contact that Surrey Police had with Mrs Perepilichnaya, is this right, that the focus was on giving her FLO support but that that had also an investigative function? | A. Yes. |
| Q. In terms of the contact that Surrey Police had with Mrs Perepilichnaya, is this right, that the focus was on giving her FLO support but that that had also an investigative function? | A. Yes. |
| Q. In terms of the contact that Surrey Police had with Mrs Perepilichnaya, is this right, that the focus was on giving her FLO support but that that had also an investigative function? | A. Yes. |
| Q. In terms of the contact that Surrey Police had with Mrs Perepilichnaya, is this right, that the focus was on giving her FLO support but that that had also an investigative function? | A. Yes. |
| Q. In terms of the contact that Surrey Police had with Mrs Perepilichnaya, is this right, that the focus was on giving her FLO support but that that had also an investigative function? | A. Yes. |
Day 6
Inquest into the death of Alexander Perepilichny
13 June 2017

1. coming to your aid.
   2. Mr Pollard, this is a document that Hermitage has
   3. prepared, where it has put in chronological order the
   4. key communications be they by email, text, voicemail or
   5. matters of that nature. If you look, please, towards
   6. the very last page, and then come back in three pages,
   7. can you see an entry that is numbered 281 on the far
   8. left -- I'm sorry it is a little small.
   9. If you find the entry that is numbered 281 on the
   10. far left, you will see some entries that are for
   11. 2 November 2012, can you see that?
   12. A. Yes.
   13. Q. Sir, I don't know if you have that reference, it is line
   14. 281, 2 November 2012, from Penny at Savills, do you see
   15. that?
   16. A. Yes.
   17. Q. There are after that a series of exchanges that begin
   18. this:
   19. "I wonder if you could clarify your maximum budget
   20. for a rental. I understand it to be £25,000 a month.
   21. There is another property we have in St George's Hill
   22. but it would be £50,000 a month. I assume this will not
   23. be of interest but thought I would mention it just in
   24. case."
   25. That is from Penny to Mr Perepilichny. He replies

Page 113

26. later that day saying:
27. "Dear Penny, thank you very much for your letter.
28. Can I ask which property is asking 50,000? Best
29. regards, Alexander."
30. Then there is discussion along these lines:
31. "Would you consider a country estate if you could
32. steal it? Look at my website, so and so Hill Estate is
33. desperate, you could make money out of this."
34. That is a different person communicating with him.
35. It goes on then to say:
36. "It is on at rental for 35,000 month, was on for
37. 12 million now dropped to offers over 8.5."
38. Then just briefly further communication about
39. Granville House being 45,000 furnished or 40,000
40. unfurnished.
41. Then Penny concludes:
42. "I can confirm the landlord has requested we do not
43. put forward any offers of less than £35,000, do let me
44. know should you wish to come up to this level."
45. He says:
46. "Maximum budget. Dear Penny, I am interested to see
47. a new house on Regona Road(?) best wishes, Alexander."
48. Do you see all of those exchanges?
49. A. Yes.
50. Q. Just go, please, forward to the next page and the bottom

Page 114

51. of that page, and look at the entries that begin, line
52. 331, 12 November 2012. This is obviously after
53. Mr Perepilichnyy's death but there are further
54. discussions about him possibly renting Granville House,
55. do you see that?
56. A. Yes.
57. Q. With commendable persistence at the top of following
58. page, Penny from Savills on 20 November:
59. "Good afternoon, Alex, are you still searching for
60. a rental property in St George's Hill, any further
61. thoughts on Granville House?"
62. Do you see that?
63. A. Yes.
64. Q. This is communications that were all provided to your
65. investigation that appear to suggest, do they not,
66. Mr Perepilichny engaged in communications about renting
67. properties?
68. A. Well other than what was in the report from
69. Clark-O'Connell that spoke about a possible purchase,
70. but yes, these do also talk about rental property.
71. Q. There is on the face of it some evidence that he was
72. looking to rent a house not buy a house; isn't that
73. right?
74. A. On those transactions, yes.
75. Q. Why is it you assume that in fact what

Page 115

76. Mrs Perepilichnaya is saying, that this was for
77. a mortgage is correct when there is evidence that may
78. suggest that is not right?
79. A. Well that is what Mrs Perepilichnaya said, so it is not
80. an assumption, it is what she said.
81. Q. That is my point with respect, officer. What I am
82. trying to test here is whether you do, for whatever
83. reason, accept what Mrs Perepilichnaya says at face
84. value, she says it is for a mortgage, does that mean it
85. must be right?
86. A. Well, we have no reason -- I have no reason not to
87. disbelieve Mrs Perepilichnaya, no.
88. Q. Well, when there is evidence that might go against that,
89. there might be, might'n't there?
90. A. Well I mean that is what she said, there is obviously --
91. you know, I accept there is correspondence around house
92. rental but equally there was comments about purchasing
93. property found on his computer. So, you know, I can't
94. get into the mind of Mr Perepilichny as to what he was
95. thinking, what his intentions were, what his timescales
96. were, anything like that.
97. Q. She had not been helpful to you, to put it as low as
98. that, about the telephones, had she?
99. A. No.
100. Q. She had not been forthcoming about his financial

Page 116
A.  No, she had not.

Q.  I am suggesting to you that for whatever reason you are assuming that her account is correct rather than approaching this in an independent and fair way?

A.  No, I take it as what it is based on what she said. I think there is a difference between her demeanour and how, what she was going through at the time of our inquiry to much later on in the inquiry when clearly, you know, the passage of time has passed. So I mean I don't think you can compare necessarily the two.

Q.  Were you in court earlier last week when she gave her evidence?

A.  No.

Q.  Have you been told that she has sought to distance herself from what your FLOs reported?

A.  Not really. I haven't discussed much of her evidence at all, to be honest.

Q.  Do you know that she has sought to say that what your FLOs wrote down was not correct?

A.  I understand that that -- yes, because I think -- yes. She put into context her comments, as -- but that was in an extract of a statement that I saw from her, yes.

Q.  In any other case, officer, where a person had fed somebody their final meal and there was a concern that they had died of poisoning not long after, would it not follow that that person would be subjected to some kind of proper interview?

A.  No. Not without any evidence that they had been poisoned and murdered, no.

Q.  Isn't it better to start from the proposition that someone might have been poisoned and approach the case with an open mind than assume the reverse is true?

A.  Well, no, actually it is -- I have approached it with an open mind because on what basis would I seek to question someone when I don't have any evidence that they have been poisoned?

Q.  You I think understand don't you that the effect of the hospital post mortem was that samples from Mr Perepilichnyy's body were tipped away. You know that that is the case, don't you?

A.  They were not tipped away. I think it needs to be put into context. Having -- after that post mortem, obviously the body or the stomach contents were washed away but that was not a deliberate act, that is a fact of what happens after a local post mortem.

Q.  So I think the answer was yes. Do you understand then the circularity of what you appear to be saying, let me put this to you, does it go along these lines.

Page 117  Page 118

Page 119  Page 120
<table>
<thead>
<tr>
<th>A.  -- and he in Moscow would like circumstances of that.</th>
<th>Page 121</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q. The point is that this was of interest to those authorities before you approached them, wasn't it?</td>
<td>1. fully open with you about the telephones, had she? You had concerns about what her accounts were about the phones?</td>
</tr>
<tr>
<td>A. Yes, the handsets.</td>
<td>2.</td>
</tr>
<tr>
<td>Q. At one point, she said to you, did she, that she wanted the phones back because of the contacts that were in the phones, is that right?</td>
<td>3.</td>
</tr>
<tr>
<td>A. Yes.</td>
<td>4.</td>
</tr>
<tr>
<td>Q. Carry on please in your policy book and look at page 554 of volume 2. There was various policy decisions made about the retention of the phones, weren't there, we can see one of them at 554. If you continue on through this group of decisions and continue to 564, ultimately you decided to retain the phones for further examination, under little (iii) on 564 you noted this, that when Ms Perepilichnaya was given a printout of the contacts she said she had access to them through iCloud, do you see that?</td>
<td>5.</td>
</tr>
<tr>
<td>A. Sorry, which --</td>
<td>6.</td>
</tr>
<tr>
<td>A. What is the policy entry number please.</td>
<td>8.</td>
</tr>
<tr>
<td>Q. Policy number 40 on page 564.</td>
<td>9.</td>
</tr>
<tr>
<td>A. Yes.</td>
<td>10.</td>
</tr>
<tr>
<td>Q. The decision is to retain the phones?</td>
<td>11.</td>
</tr>
<tr>
<td>A. Yes.</td>
<td>12.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>A. Yes, that's correct.</th>
<th>Page 122</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q. That is because it was unrealistic, was it not, to expect an international businessman of this nature to have conducted his business without some kind of computer?</td>
<td>1. Q. The issue is at one point Mrs Perepilichnaya said she needed the phones back for the contacts?</td>
</tr>
<tr>
<td>A. Well, certainly that would appear -- I mean there were some limited information but yes, I would have expected to have seen more.</td>
<td>2. A. Yes.</td>
</tr>
<tr>
<td>Q. Do you have any knowledge of any other computer that Mr Perepilichnny had access to?</td>
<td>3.</td>
</tr>
<tr>
<td>A. Other than the possibility of a Macbook that was picked up obviously or identified by the analyst, but that's why we went back to ask Tatiana for any other computers that he may have.</td>
<td>4. Q. Under (iii) she was told about the phones on 18 December and she was handed a printout of the contacts. She then said she had access to these through iCloud, do you see that?</td>
</tr>
<tr>
<td>Q. The Macbook was not seized, I think, it was never located, is that right?</td>
<td>5.</td>
</tr>
<tr>
<td>A. That's correct.</td>
<td>6.</td>
</tr>
<tr>
<td>Q. Do you have any knowledge of any other computer being taken away from the house or anything of that nature prior to your involvement?</td>
<td>7.</td>
</tr>
<tr>
<td>A. Not a computer, no. Not that I am aware of.</td>
<td>8.</td>
</tr>
<tr>
<td>Q. Or a laptop?</td>
<td>9.</td>
</tr>
<tr>
<td>A. No, not that I am aware of.</td>
<td>10.</td>
</tr>
<tr>
<td>Q. In relation to the phone analysis, you have agreed I think already that Mrs Perepilichnaya had not been</td>
<td>11.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Page 123</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q. When were they first given back to her?</td>
</tr>
<tr>
<td>A. I think it is in the log. I think it may have been -- it may have been 16 November. It is in the investigation log, I think. I think it is around about that date.</td>
</tr>
<tr>
<td>Q. It is fairly soon then after the death, isn't it, it is within a matter of days of the death?</td>
</tr>
<tr>
<td>A. It is, yes.</td>
</tr>
<tr>
<td>Q. If you look, please, again just take that large A3 document, the communications timeline. Find the entry, please, for 14 November, it is at the bottom of the penultimate page.</td>
</tr>
<tr>
<td>Do you see the first entry for 14 November on the</td>
</tr>
</tbody>
</table>
### Day 6

**Inquest into the death of Alexander Perepilichny**

**13 June 2017**

**Q.** Do you have the April 2017 statement?

**A.** No.

**Q.** Do you know who had the phones at that time?

**A.** Without checking, no, I don’t. I think they were still in the possession of the Surrey Police at that time.

**Q.** Do you know anything about how those passwords resets operate, whether you need to have the phone with you at the time or not?

**Page 125**

---

**Q.** It is that large A3 document, this one. (Indicates)

**A.** Hang on. (Pause)

**Q.** That somebody seems to be initiating a reset of the password for Mr Perepilichny's emails, do you see that?

**A.** Yes.

**Q.** Can I ask you to look, please, at your April 2017 statement?

**A.** Yes.

**Q.** Do you know who was Mrs Perepilichnaya I am not too sure, here. Sorry, I have not got it.

**A.** If you don't know then you don't know.

---

**Q.** Did you ever notice from the chronology that you looked at of communications that having taken place on 13th and 14th? Did you notice that or is this something you are being asked about for the first time today?

**A.** I didn’t notice that, no.

**Q.** It is, is it not, a potential concern that somebody was trying to change the access to his email on that day?

**A.** Well, possibly but as I say without knowing who did it, whether that was Mrs Perepilichnaya I am not too sure, but --

**Q.** Can I ask you to look, please, at your August 2017 statement, which I have in bundle 2 but I am not entirely sure where others have put it. I don't know if somebody can help me with where the second statement of Officer Pollard is, it may be behind your August 2016 one.

**A.** Yes.

**Q.** Do you have the April 2017 statement?

**A.** Yes.

**Q.** If you look, please, I don't know if the coroner has that statement, the second statement from Officer Pollard?

**THE CORONER:** Sorry, I am just looking at it. Say again?

---

**Q.** It is, is it not, a potential concern that somebody was trying to change the access to his email on that day?

**A.** That is because that is what was contained in those two boxes, yes.

**Q.** Yes, and then at 18, what was recorded there were emails from the inbox?

**A.** Yes.

**Q.** Yes?

**A.** Yes.

**Q.** Looking at what actually was translated, paragraph 15, for that email account, what was available was those in the sent and the inbox. For the second email account at 17, what was looked at were the inbox and the trash messages, is that right?

---

**Q.** Do you have the April 2017 statement?

**A.** Yes.

**Q.** Do you have the April 2017 statement?

**A.** Yes.

**Q.** If you look, please, I don't know if the coroner has that statement, the second statement from Officer Pollard?

**THE CORONER:** Sorry, I am just looking at it. Say again?
Q.  Were you looking, through your officers, for a
explicit
you agree?
look for something slightly more subtle than that, don't
sophisticated organised criminals, one should surely

Q.  Again, if one was actually dealing here with
sophisticated organised criminals, one should surely
look for something slightly more subtle than that, don't
you agree?

A.  Well, having had the opportunity to look through all the
Skype messages, I haven't found anything of a similar
nature, be it subtle or not.

Q.  You maintain the position, do you, that even having now
read the translated Skypes, you don't think they lead to
anything of concern. Is that right?

A.  That's correct, yes.

Q.  You do know, don't you, that they refer to

Page 131

Mr Perepilichnyy firstly trying to reach an agreement
about his evidence in Switzerland?
A.  There is correspondence that would appear to talk about
that, yes.
Q.  That is evidence, is it not, that evidence he is
giving against an organised criminal group?
A.  Well, it is evidence he is giving against Mr Stepanov.
Q.  And those others involved in the large-scale fraud, yes?
A.  And, well, part of that fraud, that inquiry that was
being conducted, yes.

Q.  He is trying to do a deal, isn't he, about what evidence
he is going to give against members of the KOCG?

A.  Well, there is correspondence about the case, and what
may or may not be said, so whether that is a deal or
not, he is seeking to -- certainly he would appear to
be -- minimise his role in that.

Q.  He says specifically in a conversation with the person
believed to be Mr Pavlov, the KOCG's lawyer, that he
would like to propose to "agree on our actions in
Switzerland". He is trying therefore is he not to do
a deal with organised criminals?

A.  Well, if it is to do a deal with organised criminals or
to, whether it amounts to a bribe that may be what he
was trying to do but it wasn't -- it was certainly with
that correspondence with that one individual, where

communications of Skype messages and so on, that was the
period of time that the officer should be looking at?
A.  At that time, yes.

Q.  You therefore thought that when looking at

Page 130

those discussions were --
Q.  It is a pretty dangerous game, officer, isn't it, even
if it was not an explicit threat, it is pretty dangerous
to be negotiating with organised criminals in this way,

A.  It is not for me to comment how Mr Perepilichny
conducted himself but clearly he was aware of who he was
dealing with, he was aware of what he was involved, and
he didn't seemly seem to be overly concerned about
that and in fact I think after those correspondence in
2011 he moves on to some other business venture with
someone else via Skype.
Q.  He also moves on to further discussion, doesn't he,
about the interrogation of Mr Ismagilov about which
I have asked you questions already. Mr Pavlov's
perception is that that went badly, putting it briefly
the coroner can see the references from 19 to

21 November that Mr Browder gave an interpretation of,
but the coroner can read those Skype messages but I am
quoting here from it. The person believed to be
Mr Pavlov says:
"If you do not arrive for interrogation, charges
will be issued against you in a business as usual mode
with the possibility of getting you detained at the
border."
There was clearly discussion thereafter where Mr Perepilichny was asking if searches and sanctions could be postponed, so again there are clear discussions here about the threat of legal proceedings, aren't there?

**Q.** Did you understand that one of the ways that the KOCG operates is to initiate fake legal proceedings against people, be they civil or criminal?

**A.** No.

**Q.** You didn't understand even that that was how the fraud was said to have been constructed?

**A.** Well the details of that fraud, I don’t know the ins and outs of a fraud but obviously fraud, clearly because there was correspondence that I am sure documents were forged. I think in Ms Clark-O’Connell’s report she makes reference of perhaps some dishonest dealings that Mr Perepilichny had, because she made mention of some forged documents. So that is all part of fraud.

**Q.** You know don't you that internationally there has been widespread recognition that Mr Magnitsky, the lawyer, was falsely detained and then killed. You know that, don’t you?

**A.** Mr Magnitsky was arrested and died in Russian police detention, yes.

**Q.** And that it is broadly accepted that he was detained for no fair reason, so you do know this is part of what the KOCG do, don’t you?

**A.** Well I am not familiar with Mr Magnitsky’s case to the extent that I can answer that question.

**Q.** If you had read these Skypes, officer, or your team had, what I suggest to you is that the threat here that was being made by Mr Pavlov was of criminal or similar proceedings against Mr Perepilichny if he did not cooperate. Do you accept that?

**A.** Well if Mr Pavlov is a lawyer of the Russian interior minister and if there is a crime that is recorded and reported, then the legal professional people in Russia would investigate that. Now if then Mr Perepilichny chose to then try and mitigate his role in that by way of a bribe, then clearly that is what those conversations may have alluded to but after the exchanges between September and November, all matters appear to have been resolved and Mr Perepilichny continued in his other business ventures.

**Q.** You knew though didn't you that it was said that Mr Pavlov was part of this organised criminal group?

**A.** Sorry, who said?

**Q.** That Mr Pavlov was said to be part of this criminal group?

**A.** I think that is what is reported on the Russian Untouchable website. I don’t think Mr Pavlov would describe himself if he was to be asked that question.

**Q.** The Skype messages did continue, didn’t they, with discussions around other matters to do with proceedings potentially in Russia. Did you understand that from the Skype messages?

**A.** From which dates?

**Q.** The Skype messages continue until early 2012 and it was said by Mr Perepilichny that the evidence given by his brother-in-law had been interpreted as a bribery attempt and there was discussion about whether, if there was cooperation, criminal charges could not be brought. Did you understand that part of the Skype messages?

**A.** Yes, I think they were the messages with the Skype ID of Bombarash 877 I think, because they then also talk about some business venture in Smolensk.

**Q.** This is the man who is said to be the liaison person between Mr Perepilichny and the KOCG and he communicates their apparent desire for a payment of €1 million and Mr Perepilichny comments on how that seems quite a lot of money, but that appears to be the price that is being asked for. Do you know that now from the Skypes?

**A.** Yes, having read that, the cost of him not being — or his employees being indicted.

**Q.** One fair reading of that is that that is an extortionate attempt; isn’t that right?

**A.** Well, a fair reading of that would suggest that Mr Perepilichny is trying to bribe his way out of any criminal proceedings, and cost of that is €1 million, of which he thought was a little bit expensive and asked if that could be negotiated.

**Q.** Are you approaching the interpretation of these documents, officer, with a fair and open mind?

**A.** I am approaching them based on the context of all of the conversations rather than soundbites of particular Skype messages. So that is my reading of it.

**Q.** The Skype messages end, don’t they, in early 2012, so this coroner cannot be assisted by anything beyond that period until the time of his death. That's right, isn’t it?

**A.** Yes, that’s correct.

**Q.** Because of the defects in the way in which the phone evidence or email evidence was obtained?

**A.** Well I don’t know the reason for that, whether that was how it was obtained or not but there is a gap between May and October, that’s correct.

**Q.** Mr Perepilichny was recorded, for your note at page 779
**Day 6**

**Inquest into the death of Alexander Perepilichny**

13 June 2017

---

<table>
<thead>
<tr>
<th>Page 137</th>
<th>Page 138</th>
<th>Page 139</th>
<th>Page 140</th>
</tr>
</thead>
<tbody>
<tr>
<td>of volume 2, as a regular user of Whatsapp and Viber, wasn't he?</td>
<td>a difference. So he was a suspect of a fraud, a suspect of a fraud.</td>
<td>Q. Yes. International criminal law colleagues suspected him of involvement in organised crime and money laundering, didn't they?</td>
<td>isn't it?</td>
</tr>
<tr>
<td>A. Yes.</td>
<td>Q. Yes.</td>
<td>A. Suspected him, yes.</td>
<td>A. That is correct, yes.</td>
</tr>
<tr>
<td>Q. There was no attempt or ability to analyse those accounts for him. That is right, isn't it?</td>
<td>A. Clearly they were not retrieved, so I don't know the technical reasons for that, whether they are retrievable or not but they weren't, no.</td>
<td>Q. Why are you so determined to say that you had no intelligence at all about his involvement in organised crime?</td>
<td>Q. That did amount to material suggesting that Interpol were concerned about his links with organised crime, weren't they?</td>
</tr>
<tr>
<td>A. Well, the Whatsapp, the Viber and the Skype, so that is social media to me.</td>
<td>Q. You suggested on Friday that he was a social media user but we have no evidence of that, do we?</td>
<td>A. Suspected him, yes.</td>
<td>A. No, what that says is that he was a suspect in a fraud, which was -- part of that fraud of which was being investigated by the Attorney General's Office in Switzerland, for which Mr Perepilichnyy was giving evidence, so ...</td>
</tr>
<tr>
<td>Q. I see, I see.</td>
<td>A. Well just through his phone and method of communication.</td>
<td>A. It's the same request.</td>
<td>Q. The Swiss authorities were also concerned, weren't they, about what Mr Perepilichnyy's evidence showed, about his involvement in the fraud that they were investigating. That's right, isn't it?</td>
</tr>
<tr>
<td>You have been asked questions repeatedly about the assertion that you made in your report that you had no intelligence about his links with organised criminal groups. You had been aware, hadn't you, that in 2010 Moscow Interpol had asked for information about Mr Perepilichnyy?</td>
<td>Q. What do you mean by social media, Facebook, Instagram?</td>
<td>A. It asked if he had any property in the UK, it was a request for information.</td>
<td>A. You made a request for information. It is not graded intelligence of any provenance and the request was for whether he had got or obtained property in the UK, so that is --</td>
</tr>
<tr>
<td>A. Yes.</td>
<td>Q. Can you turn that up, please, it is volume 5, page 511 -- the learned coroner should perhaps look at this quite carefully, please.</td>
<td>Q. -- after Mr Perepilichnyy's death, on 5 December 2012 but in fact a broader request, covering property in different places, not just in England. That's right,</td>
<td></td>
</tr>
<tr>
<td>THE CORONER: Yes.</td>
<td>It is a chain that begins at 509 but the key part I think is 511.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Question</td>
<td>Answer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>----------</td>
<td>--------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Did you provide them with any further information?</td>
<td>Yes.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Well, I did around the circumstances – well the fact that the death was not through poison or murder, yes,</td>
<td>I did give them that update, yes.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q. They made clear to you didn't they their concern that three witnesses had already died in connection with that particular case?</td>
<td>A. Yes, I think they referred to that or obtained that from the Russian Untouchable website.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q. Just for completeness on this issue, at 318, you knew</td>
<td>A. Yes, they were, yes.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q. Did you provide them with any further information?</td>
<td>A. Yes, I think they referred to that or obtained that from the Russian Untouchable website.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q. What was being investigated here was a high level fraud, wasn't it?</td>
<td>A. It was a fraud, yes.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Have you seen any of the Swiss evidence?</td>
<td>Yes. You see that?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q. While we are here, we can just look up, please, page 324. At the top of page 324 you knew didn't you that Mr Perepilichnyy had said to the Swiss that he was concerned that he would end up in the same situation as Sergei Magnitsky. Do you see that at the top of page 324?</td>
<td>A. &quot;He could end up in the same situation as Hermitage or even like Sergei Magnitsky.&quot;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q. Is this right, that as far as the Swiss inquiries are concerned, you took a similar view that those email exchanges were sufficient evidence from the Swiss and you were not going to obtain any more case material from them, is that right?</td>
<td>A. Well, again, if I had have wanted any further material, then they requested an international letter of request but I was satisfied with the questions that I had asked and the responses that I had been given, that at that stage didn't require me to obtain any further information from them.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q. When you read that, officer, was that not a matter of some significance to you?</td>
<td>A. Not really. As I say, I mean I am not familiar with that particular process in that country but if that is the manner in which those matters are dealt with, Mr Perepilichnyy was more than happy to support that investigation and although he only attended once in person, on 26 April, his solicitors were still in contact with the Swiss authorities and I think they wrote a letter dated October 2012, which was the last – in fact they did on 1 October. So clearly he was still willing to cooperate in that investigation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q. The Skypes indicated, didn't they, an attempt earlier in this chronology by Mr Perepilichnyy to make some kind of arrangement about his evidence in Switzerland, in Lausanne in particular, that this date of 13 September</td>
<td>A. Yes, 13 September, sir.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Do you understand that there were other cases where people had been giving evidence against members of the Russian organised criminal group who have died before they give evidence?</td>
<td>A. Only limited, based on the – what was on the Russian Untouchable website, no … nothing from official law enforcement.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q. That was about six weeks, was it not, before Mr Perepilichnyy died?</td>
<td>A. Yes.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q. When you read that officer, was that not a matter of some significance to you?</td>
<td>A. Not really. As I say, I mean I am not familiar with that particular process in that country but if that is the manner in which those matters are dealt with, Mr Perepilichnyy was more than happy to support that investigation and although he only attended once in person, on 26 April, his solicitors were still in contact with the Swiss authorities and I think they wrote a letter dated October 2012, which was the last – in fact they did on 1 October. So clearly he was still willing to cooperate in that investigation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q. That was about six weeks, was it not, before Mr Perepilichnyy died?</td>
<td>A. Yes.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q. When you read that officer, was that not a matter of some significance to you?</td>
<td>A. Not really. As I say, I mean I am not familiar with that particular process in that country but if that is the manner in which those matters are dealt with, Mr Perepilichnyy was more than happy to support that investigation and although he only attended once in person, on 26 April, his solicitors were still in contact with the Swiss authorities and I think they wrote a letter dated October 2012, which was the last – in fact they did on 1 October. So clearly he was still willing to cooperate in that investigation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q. That was about six weeks, was it not, before Mr Perepilichnyy died?</td>
<td>A. Yes.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q. When you read that officer, was that not a matter of some significance to you?</td>
<td>A. Not really. As I say, I mean I am not familiar with that particular process in that country but if that is the manner in which those matters are dealt with, Mr Perepilichnyy was more than happy to support that investigation and although he only attended once in person, on 26 April, his solicitors were still in contact with the Swiss authorities and I think they wrote a letter dated October 2012, which was the last – in fact they did on 1 October. So clearly he was still willing to cooperate in that investigation.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Day 6  
Inquest into the death of Alexander Perepilichny  
13 June 2017

| Page 145 | Page 146 | Page 147
|----------------|----------------|----------------|
| **Q.** It is a matter of common sense, isn't it, that  
Mr Stepanov would not have been very pleased by that  
news, would he?  
| **A.** I am sure he wouldn't, but that still doesn't mean that  
Mr Perepilichny was murdered.  
| **A.** Based on what was put on the Russian Untouchable  
website, yes.  
| **Q.** No, based on what the Swiss told you, "DC Pollard spoke  
to the Swiss authorities and Alexander is the fourth  
witness in their case to die".  
| **A.** Right.  
| **Q.** In their case.  
| **A.** In their case, based on what was on the Russian  
Untouchable website.  
| **Q.** I don't think that is a fair point, is it, if you look,  
please, at page 328.  
| **A.** Yes, and when I spoke to the Swiss authorities, that is  
when Mr Lewis informed me that he was aware of three  
deaths from the Russian Untouchable website.  
| **MS HILL:** Pause there, please.  

| **Q.** You can see I think if you look again on the A3  
chronology, take it from me perhaps, around three pages  
in from the back?  
| **THE CORONER:** Hold on, I have 11 pages of this but if that  
is right --  
| **A.** I don't know if you want to take a small break. I will  
be as proportionate as I can but I have a few more  
questions for him.  
| **THE CORONER:** That is fine.  
| **Q.** There was a concern here about a further development to  
do with some MLA request from Russia and potentially  
that Mr Perepilichny would be "the culprit". Can you  
see that? MLA I think is a money laundering -- I am not  
sure what it is, actually mutual legal assistance,  
for me that if you look again on the A3  
comments four lines up from the bottom, you see where it says, "Switzerland  
date this is the fourth death involving people in this  
case". That is something that Switzerland is saying,  
 isn't it?  
| **A.** One of his lawyers, yes.  
| **Q.** A short adjournment.  
| **A.** Yes.  
| **Q.** For me that is page 9, yes.  
| **MS HILL:** Third one down, 1 November.  
| **Q.** At no point did you seek to interview Mr Pavlov at all,  
| **A.** Usual warning.  
| **A.** In their case.  
| **Q.** It has been too long a day.  
| **THE CORONER:** Hold on.  
| **Q.** Mr Pavlov, you agreed I think in questions from my  
learned friend behind me that border  
checks, such as they were, that you and your  
investigation carried out did not reveal the fact that  
Mr Pavlov had left this country the day after  
Mr Perepilichny's death. That's right, isn't it?  
| **MS HILL:** Pause there, please.  
| **Q.** In their case.  
| **Q.** No, based on what the Swiss told you, "DC Pollard spoke  
to the Swiss authorities and Alexander is the fourth  
witness in their case to die".  
| **A.** One of his lawyers, yes.  
| **Q.** DC Pollard spoke to the Swiss authorities, Alexander is  
the fourth witness in their case to die, page 22,  
volume 5.  
| **Q.** No based on what the Swiss told you, "DC Pollard spoke  
to the Swiss authorities and Alexander is the fourth  
witness in their case to die".  
| **A.** I answered that on Friday, and no, because there were no  
grounds to justify interviewing Mr Pavlov because in the  
absence of there being any evidence of murder, clearly  
his status could not have been determined as to whether  
he was a suspect, a witness or actually nothing. So no,  

---

**Page 145**

1. Q. It is a matter of common sense, isn't it, that Mr Stepanov would not have been very pleased by that news, would he?
2. A. I am sure he wouldn't, but that still doesn't mean that Mr Perepilichny was murdered.
3. Q. Do you know that he was dealing with his Swiss lawyers right up until date of his death? Having communications with his Swiss lawyers until very close to the date of his death?
4. A. His lawyers, yes, because that is the emails.
5. Q. You can see I think if you look again on the A3 chronology, take it from me perhaps, around three pages in from the back?
6. The CORONER: Hold on, I have 11 pages of this but if that is right --
7. MS HILL: It is 1 November, sir, it is the entry that is numbered page 278 on the far left.
8. THE CORONER: Hold on.
9. For me that is page 9, yes.
10. 278, third one down?
11. MS HILL: Third one down, 1 November.
12. THE CORONER: Yes.
13. MS HILL: Sorry, fourth one down, 1 November is "Can we get a better price on Pinebrook", 2 November is this one: "Dear Alexander, I refer to our meeting of Wednesday 27 November, if you look at the comments four lines up from the bottom, you see where it says, "Switzerland state this is the fourth death involving people in this case". That is something that Switzerland is saying, isn't it?
14. A. Yes, and when I spoke to the Swiss authorities, that is when Mr Lewis informed me that he was aware of three deaths from the Russian Untouchable website.

---

**Page 146**

1. Q. It is a matter of common sense, isn't it, that Mr Stepanov would not have been very pleased by that news, would he?
2. A. I answered that on Friday, and no, because there were no grounds to justify interviewing Mr Pavlov because in the absence of there being any evidence of murder, clearly his status could not have been determined as to whether he was a suspect, a witness or actually nothing. So no,

---

**Page 147**

1. Q. It is a matter of common sense, isn't it, that Mr Stepanov would not have been very pleased by that news, would he?
2. A. I answered that on Friday, and no, because there were no grounds to justify interviewing Mr Pavlov because in the absence of there being any evidence of murder, clearly his status could not have been determined as to whether he was a suspect, a witness or actually nothing. So no, 3. I don't know if you want to take a small break. I will be as proportionate as I can but I have a few more questions for him.
4. THE CORONER: That is fine.
5. Usual warning.
6. (3.21 pm)
7. (A short adjournment)
8. (3.45 pm)
9. MS HILL: Mr Pavlov, you agreed I think in questions from my learned friend behind me -- sorry, what did I say?
10. Mr Pavlov, forgive me, Mr Pollard. It is a question about Mr Pavlov, sorry. It has been too long a day.
11. You agreed to my learned friend behind me that border checks, such as they were, that you and your investigation carried out did not reveal the fact that Mr Pavlov had left this country the day after Mr Perepilichny's death. That's right, isn't it?
12. A. Yes, and when I spoke to the Swiss authorities, that is when Mr Lewis informed me that he was aware of three deaths from the Russian Untouchable website.
13. MS HILL: Pause there, please.
14. Q. It has been too long a day.
15. THE CORONER: Hold on.
16. Q. Mr Pavlov, you agreed I think in questions from my learned friend behind me -- sorry, what did I say?
17. Mr Pavlov, forgive me, Mr Pollard. It is a question about Mr Pavlov, sorry. It has been too long a day.
18. Q. At no point did you seek to interview Mr Pavlov at all, did you?
19. A. Yes.
20. Q. No, based on what the Swiss told you, "DC Pollard spoke to the Swiss authorities and Alexander is the fourth witness in their case to die".
21. A. One of his lawyers, yes.
22. Q. A short adjournment.
23. A. Yes.
24. Q. For me that is page 9, yes.
25. MS HILL: Third one down, 1 November.
Day 6  Inquest into the death of Alexander Perepilichny  13 June 2017

I didn't for those reasons.

THE CORONER: You said left on 11 November. Do you know when he arrived?

MS HILL: I think that is not known, sir.

A. I don't know when he arrived.

THE CORONER: Did he come back, do you know?

A. I don't know if he came back, actually.

THE CORONER: After 11 November, did he ever come back to the UK?

A. I don't know, sir, because I didn't do those checks.

That was done by Mr Travers following the request.

THE CORONER: All right.

MS HILL: Do you know that in The Times on 23 May last year Mr Pavlov indicated that he was willing to be interviewed by British police but had never been invited to do so?

A. What was the date, sorry.

Q. Did you know in the course of this Inquest -- it came up at one of the pre-inquest reviews, which I think you have been attending -- that Mr Pavlov told journalists in The Times on 23 May last year that he was willing to travel to Britain to be interviewed by police but had never been invited to do so? Did you know about that?

A. Not off the top of my head, no.

Q. Even now, having seen the Skype material, that appears never to have suggested his communications with Mr Perepilichnyy, you have made no further attempts to speak to Mr Pavlov, is that right?

A. There is no reason to speak to -- I have no reason to speak to Mr Pavlov.

Q. As far as the dossier is concerned, this was information that featured in the material that Hermitage provided to your investigation, wasn't it?

A. Well the commentary was, I wasn't aware of -- there no dossier. Just a comment that Mr Perepilichnyy had made to them in November 2011.

Q. The suggestion was that the name of Mr Perepilichnyy had featured on this dossier that had been found in the custody of Mr Lurakhmaev, that is what you understood, isn't it?

A. Not in 2012, no. Not from Hermitage's correspondence, no.

Q. Do you want to look briefly at what Hermitage told you about this, please. If you find the evidence of their letters to you, bear with me a second, you will see this in the 27 November letter. It is volume 1, page 300 -- in fact forgive me, it is the 18 December letter but I think it is in the same folder, volume 1, page 307.

Volume 1, page 307 is the 18 December letter.

This followed on, didn't it, from a meeting that

some of your officers had had with Hermitage on 6 December. That is right, isn't it?

A. Yes, it is.

Q. For the learned coroner's note, Officer Dando's report is at page 188 of volume 1, Officer Drinkwater's report or notebook is at page 212 of volume 2. The second of those made clear that the dossier had been discussed in the 6 December meeting, and was then referred to in the 18 December letter. If you look, please, over the page, on 165, it says this --

A. Sorry, right. I was asked to look at page 308.

Q. Look on the second page of this letter, I have different numbering from a different bundle. Look on the second page of the letter.

A. It is the letter dated 18 December.

Q. Second page and the heading "Threats to Mr Perepilichnyy".

A. Yes.

Q. "As we explained to you during our meeting, around November 2011 Mr Perepilichnyy informed our client about the existence of this dossier, his name on a so-called hit list."

Do you see that?

A. Yes.

Q. Then:

"Further information was given about that in the letter."

There are press reports that refer to this particular dossier but is this right, that you did not make attempts to obtain that in any international way?

A. Not at that time for two reasons.

Again, 1, Mr Perepilichnyy informed Hermitage that he was of the opinion it was an extortion attempt and never raised the matter after that. It was a year previous to his death.

And, again, had there been any evidence of murder, identified from the detailed tests, then this, like a number of other matters, would have fallen under further review and may have identified a line of inquiry had there been any evidence of murder, but not at that time, at that stage, there was -- I did not pursue that for those reasons.

Q. You know though don't you that those sort of international requests if they are made do take a certain period of time to be complied with, don't you?

That is your own experience, isn't it?

A. They can do, yes.

Q. The net result of where we are on this evidence is that unless Mr Suter can perhaps perform some magic in the next few days, we don't know whether this coroner will
A. No, I can’t recall, there was so many press reports, I didn’t read all of them at the time, I was merely focusing on the inquiries that were conducted rather than media reports.

Q. Turn over the next page of Hermitage’s letter, please, where they refer in italics on the third page of this letter to court documents from a Moscow case that describe Mr Perepilichnyy as living outside the Russian Federation because he fears for his life. These were reports in the Independent newspaper, I think there are separately reports on the BBC saying that they had seen those court documents.

A. It follows I think doesn’t it that that was not information you sought to obtain from the Moscow courts.

That’s right, isn’t it?

A. Not at that stage, no.

Page 153

Page 154

Q. Well not at any stage. You didn’t follow up that line of inquiry, did you?

A. No, I didn’t. Because there was no evidence that he was murdered.

Q. You didn’t liaise with your Russian counterparts to find out anything about the $3 million dispute that Mr Perepilichny had with Mr Kovtun, did you?

A. No, not at that stage for the reasons I have previously given.

Q. I would like to ask you some questions now about the totality of the evidence that I suggest was in fact before you of threats to Mr Perepilichnyy, danger and concerns over his safety. I have a very short timeline, I would just ask you to look at which we have copies of for everybody else with the references on, which may help in following the questions to you.

Mr Pollard, what we have done on this short document is try to put into some kind of order as a ready reckoner the evidence in chronological order that we suggest was in fact before Surrey Police.

THE CORONER: Sorry, I am just looking -- I am still on 309.

MS HILL: Forgive me, sir, let me go back to that.

THE CORONER: All right.

MS HILL: What is the issue that I can assist --

THE CORONER: No, no, just that the court documents from a Moscow case last year. I just want to know, is this Mr Pavlov saying in a court document?

MS HILL: Let me pull out the letter.

THE CORONER: It is the bit you just showed me. When you go to 309, there was just a bit in italics, third paragraph down which you ...

MS HILL: The italics that refer to the court documents --

THE CORONER: I am just trying to -- is it Mr Pavlov says in a court document?

A. I think it is a journalist, isn’t it?

MS HILL: I think there are two different press reports about this --

THE CORONER: Yes.

MS HILL: -- and in one of them Mr Perepilichnyy’s lawyer says this. It may be the second of the two, The Telegraph one.

It is quoted in a court document from his lawyer, is my understanding of it. We have the original article, sir, if you want to look at them if that helps you put them into a broader context, because in fact if you look at the timeline we have just handed up to you. The documents in question are in volume 1 of my learned friend for the insurer's bundle, because one can see, if you look at the very end of the timeline, page 113 of the volume 1 is the BBC report of this. Page 92 of volume 1 is the Daily Telegraph article.

I think where it lands, if I understand it correctly, is the Independent report that court documents refer to Mr Perepilichny living outside the Federation because he fears for his life.

There is also then the BBC report of a similar things that quotes a document from a Moscow court, that is the one I just took you to at 112 of volume 1. And there is a Telegraph article at page 92 of volume 1.

I think I am probably confusing you, sir.

THE CORONER: No, it is just these things one just has to get to the start of them otherwise one is at risk of just recycling but I have it, so 112 -- give me the other ones.

MS HILL: 92.

THE CORONER: "The BBC ..."

MS HILL: The BBC are at 112.

THE CORONER: "... has seen a document from a Moscow court in which a spokesman "..." Right, that is that one.

You very kindly gave me another reference, where was the other one?

MS HILL: 92 is the Telegraph article. Which again quotes public records that refer to Mr Perepilichnyy's legal
Day 6  Inquest into the death of Alexander Perepilichny  13 June 2017

<table>
<thead>
<tr>
<th>Page 157</th>
<th>Page 158</th>
</tr>
</thead>
<tbody>
<tr>
<td>representative saying in court that he was living outside the Federation because he fears for his life. Then the Independent article that is referenced in this letter in italics seems to be a report of the same thing. I think if you turn over page, sir, you will see the Independent article itself in full, certainly in one of the versions of this letter, I don't know if you will find it in volume 1, if you find at page 311 the Independent article itself. Do you see that at the bottom of 311, court documents?</td>
<td>Q. That on each and every occasion when there is some evidence of threats or fear, you appear very willing to accept an alternative interpretation. Do you understand that that is what I am suggesting to you? A. Well I don't speculate on those, or -- or put them in, you know sometimes it is difficult to put them into the context of what they said or what they mean. So that is my interpretation of those, given the context in which they were, we were not able to explore them further, and looking at the totality of the investigation is how I reach my conclusions. Q. For some reason, it is my suggestion to you that your interpretation of these individual items is always to minimise the fear or the threat that they suggest. Do you understand? A. I understand what you are saying but no, that is not the case.</td>
</tr>
<tr>
<td>Q. Sir, my understanding is there are two sources where it is said that the source in the court document is Mr Perepilichny's lawyer, but the Independent doesn't quite make that clear. Does that help you? THE CORONER: Yes. MS HILL: Yes, no, I am ... Do we know what the public record is that is referred to at page 92?</td>
<td>Q. Taking the first two then briefly if I may, Mr Gherson on 16 or 18 November 2012 called Surrey Police and made it clear that he was concerned that Mr Perepilichny had been concerned about his safety in recent weeks and followed it up a few days later with a call to the effect that Mrs Perepilichnaya was very distressed and worried about other incidents and had told Mr Gherson that some people said to her that they knew where she waived his client's privilege but he wrote into Surrey Police and said that he is not able to or has no information to give to my Inquiry that can be of any assistance. Now if someone is that concerned about someone, privilege or not, I would have expected them to waived that and told my officers exactly what the nature of those threats were and not hide behind client confidentiality. A. Well, if he was that concerned, surely he would have waived his client's privilege but he wrote into Surrey Police and said that he is not able to or has no information to give to my Inquiry that can be of any assistance. Now if someone is that concerned about someone, privilege or not, I would have expected them to waived that and told my officers exactly what the nature of those threats were and not hide behind client confidentiality. A. Yes, thank you so much. We are on to this? MS HILL: Yes, we are.</td>
</tr>
<tr>
<td>THE CORONER: If it is a public record, it ought to be easily -- that what Mr Parfitt, I don't know him but that is what he says. MS HILL: Yes. THE CORONER: If it is a public record that he is referring to, I suppose there can't be anything sensitive about it?</td>
<td>THE CORONER: Thank you. MS HILL: Yes, we are.</td>
</tr>
<tr>
<td>MS HILL: Sir, my understanding is there are two sources where it is said that the source in the court document is Mr Perepilichny's lawyer, but the Independent doesn't quite make that clear. Does that help you? THE CORONER: Yes. MS HILL: Yes, no, I am ... Do we know what the public record is that is referred to at page 92?</td>
<td>A. That is what you are suggesting but that is not what I did, no.</td>
</tr>
<tr>
<td>THE CORONER: Yes. MS HILL: Yes. THE CORONER: If it is a public record that he is referring to, I suppose there can't be anything sensitive about it? MS HILL: I assume not, but it is not something that is before you at the moment.</td>
<td></td>
</tr>
<tr>
<td>THE CORONER: No. Just give me a minute. (Pause) Yes, thank you so much. We are on to this? MS HILL: Yes, we are.</td>
<td></td>
</tr>
<tr>
<td>A. That is what you are suggesting but that is not what I did, no.</td>
<td></td>
</tr>
</tbody>
</table>

40 (Pages 157 to 160)
<table>
<thead>
<tr>
<th>Page 161</th>
<th>Page 162</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE CORONER: What is the date of that?</td>
<td>That toxicology work was appropriate.</td>
</tr>
<tr>
<td>A. Unfortunately they have not put that in here but it is</td>
<td>He called again a few days later saying, as is</td>
</tr>
<tr>
<td>in one of documents sent to me which was able to inform</td>
<td>recorded on that short timeline, that:</td>
</tr>
<tr>
<td>my decision, but obviously Ms Hill's team has not put</td>
<td>&quot;Mrs Perepilichnaya was very distressed and worried</td>
</tr>
<tr>
<td>what Mr Gherson’s response was when my officers went to</td>
<td>about other incidents, had told Mr Gherson that some</td>
</tr>
</tbody>
</table>
| see him and his subsequent email. | people had said they knew where she and the kids lived."
| MS HILL: You can see if it helps you, sir, in volume 5, | What I am suggesting to you, Mr Pollard, is that |
| page 6, the email from Mr Gherson himself. | that was clearly significant information coming from |
| THE CORONER: Hold on. Yes. | Mrs Perepilichnaya's lawyer about the deceased having |
| Do you have that? | concerns about his safety in recent weeks. Do you see |
| A. I am just having a look, sir. | that? |
| THE CORONER: Thank you, Ms Hill. I have that. | A. Yes, which is why we went to go and see him, but what |
| MS HILL: On volume 5, page 6, just briefly Mr Gherson | was disappointing was that he says in the last sentence |
| emailed Mr Dando confirming he had telephoned on the | of that last paragraph, on page 7, that: |
| 16th, do you see that, and that he had asked to ensure | "I continue to believe that I have no meaningful or |
| that detailed toxicology tests were conducted. | relevant information to help you in any event. Though |
| THE CORONER: Do you have that Mr Pollard? Are you all | I accept that this is something you may wish to satisfy |
| right? We both have it, page 6, yes. | yourself."
| A. Page 6, yes. | So that is what he said. |
| MS HILL: Then he explains in the remainder of the email | THE CORONER: That is what you mean by... |
| what his limited mandate was, the foot of page 6 says | MS HILL: Putting aside though what more he might have been |
| that: | able to say, what he actually did say to you was |
| "I have a limited mandate given to me at the time of | a concern, wasn't it, that the deceased had been |
| Mr Perepilichnys death to communicate on behalf of | concerned about his safety and that Mrs Perepilichnaya |
| Mrs Perepilchnaya the need for detailed | was now concerned about people knowing where she and the |
| toxicology tests." | children lived. |
| THE CORONER: Yes. | Even if you were frustrated that he wouldn't tell |
| MS HILL: That was the basis on which he was unable to go | you more, what he did tell you should have alerted you |
| any further than what he had initially said, do you see | to a concern, shouldn't it? |
| that? | A. That is why we went to go and see him but why he then |
| A. Which paragraph is that, sorry? | didn't feel that he could tell us more about those, |
| Q. The very end of page 6 of volume 5 he explained that he | perhaps because he didn't know anything. I mean it is |
| perceived there were issues about his mandate and his | quite clear there what he says, it is his own writing in |
| instructions? | an email that he has sent, that he has said: |
| A. All right, yes, in relation to the -- yes. | "I continue to believe that I have no meaningful or |
| Q. He had nevertheless made clear in the call, that he says | relevant information to help you in any event."
| is on the 16th, that he felt detailed toxicology tests | Now there is not a lot I can do about that. |
| should be carried out. That is clear, isn't it? | Q. You are focusing aren't you with respect, Mr Pollard, on |
| A. Yes. | what he didn't tell you rather than what he did tell |
| Q. The learned coroner has already looked at this, I don't | you. What I am suggesting to you is that you are |
| want to trouble him too much with it, but the police log | minimising the significance of what he did tell you, |
| at 374, I will just read it out, page 374 I think of | which is that the deceased and his widow were concerned |
| volume 2, he had said in the call: | for their safety. You didn't do anything further to try |
| "He was a family lawyer acting on behalf of the | and action that, did you? |
| deceased widow, wished to share the deceased had been | A. Well we did because we went to go and see Mr Gherson and |
| involved in a large-scale fraud. The deceased was | that is what he told us. We tried to speak to |
| a witness in these matters. There had been several | Mrs Perepilichnaya more, she didn't tell us that -- or |
| proceedings and banning orders, and as a result of these | she didn't elaborate any further with us. |
| issues the deceased is alleged to have been concerned | So, you know, I am afraid there isn't an awful lot |
| regarding his safety in recent weeks. He therefore felt | I can do when I am given information like that with |

---

<table>
<thead>
<tr>
<th>Page 163</th>
<th>Page 164</th>
</tr>
</thead>
<tbody>
<tr>
<td>children lived.</td>
<td>Even if you were frustrated that he wouldn't tell</td>
</tr>
<tr>
<td>Even if you were frustrated that he wouldn't tell</td>
<td>you more, what he did tell you should have alerted you</td>
</tr>
<tr>
<td>you more, what he did tell you should have alerted you</td>
<td>to a concern, shouldn't it?</td>
</tr>
<tr>
<td>to a concern, shouldn't it?</td>
<td>A. That is why we went to go and see him but why he then</td>
</tr>
<tr>
<td>didn't feel that he could tell us more about those,</td>
<td>didn't feel that he could tell us more about those,</td>
</tr>
<tr>
<td>perhaps because he didn't know anything. I mean it is</td>
<td>perhaps because he didn't know anything. I mean it is</td>
</tr>
<tr>
<td>quite clear there what he says, it is his own writing in</td>
<td>quite clear there what he says, it is his own writing in</td>
</tr>
<tr>
<td>an email that he has sent, that he has said:</td>
<td>an email that he has sent, that he has said:</td>
</tr>
<tr>
<td>&quot;I continue to believe that I have no meaningful or</td>
<td>&quot;I continue to believe that I have no meaningful or</td>
</tr>
</tbody>
</table>
| relevant information to help you in any event."
| Now there is not a lot I can do about that. | relevant information to help you in any event."
| Q. You are focusing aren't you with respect, Mr Pollard, on | Now there is not a lot I can do about that. |
| what he didn't tell you rather than what he did tell | you. What I am suggesting to you is that you are |
| you. What I am suggesting to you is that you are | minimising the significance of what he did tell you, |
| minimising the significance of what he did tell you, | which is that the deceased and his widow were concerned |
| which is that the deceased and his widow were concerned | for their safety. You didn't do anything further to try |
| for their safety. You didn't do anything further to try | and action that, did you? |
| and action that, did you? | A. Well we did because we went to go and see Mr Gherson and |
| A. Well we did because we went to go and see Mr Gherson and | that is what he told us. We tried to speak to |
| that is what he told us. We tried to speak to | Mrs Perepilichnaya more, she didn't tell us that -- or |
| Mrs Perepilichnaya more, she didn't tell us that -- or | she didn't elaborate any further with us. |
| she didn't elaborate any further with us. | So, you know, I am afraid there isn't an awful lot |
| So, you know, I am afraid there isn't an awful lot | I can do when I am given information like that with |
MS HILL: You understand, officer, why I am asking you these questions, don't you, because you have repeatedly said that there is no evidence that he was, Mr Perepilichnyy, was threatened or in danger or in fear during his life.

I am suggesting to you the content of what Mr Gherson did tell you is just the very beginning of a line of people telling you that there were in fact threats and concerns about him. Do you understand that?

A. It is the beginning but not the end because they were never able to substantiate that.

Q. Let's look further down, the coroner doesn't need to turn it up again but 27 November Hermitage write saying we understand Mr Perepilichny has received death threats.

A. Yes.

THE CORONER: That is what he said to you?

A. Yes.

Page 165

Q. All right, moving down the timeline if I may --

THE CORONER: The answer is you did go back to him, yes?

A. Yes.

THE CORONER: The answer is you did go back to him, yes?

A. Yes.

Page 166

Q. This is an extract from an intelligence report, isn't it, you see that, it begins at page 120?

A. Yes.

Q. Again, as I explained, we are -- you know, I wanted to explore that with the -- through the FLOs but Mrs Perepilichnaya was not forthcoming with putting the context around that at the time.

The voicemail was post the death, and when she was asked about that she explained that it sounded like a judicial matter not a threat and that the voice was quite polite.

Q. Yes, again what you are doing here if I may say is accepting the minimum interpretation of this. You are minimising the evidence of the threats, aren't you?

A. No, I am not minimising it, I am basing that on what I am told by Mrs Perepilichnaya who listened to the message and told my officers what it was. I can only go by what I am told.
A. I understand what you are saying --
Q. Just hear the question out, Mr Pollard. If that is right and if she is right on that issue, and this date suggests that they were already in The Coach House by June 2011, look at the bottom of this page, they had therefore moved, hadn't they, within three and a half weeks of Mrs Perepilichnaya's contact with the police that you see referred to on 31 May 2011 at the bottom of that note?
A. If that is the case.
Q. If that is right?
A. I base that on the letting agents that let the property out and the date that they let that property was in July 2012 --
Q. Yes.

THE CORONER: Ms Hill, can you help me before we leave 250.
A. Yes.
Q. That does suggest, doesn't it, that Mr Perepilichnyy was giving The Coach House address regularly to Western Union from 15 September 2011. For some reason, for one of those entries he gives his old address but every other entry, 15 September there are two payments, 7 November, 28th, 6 December, 27 December, 9 January, 4 October, 13 October, he always gives The Coach House address. That suggests doesn't it, gives further weight to Mrs Perepilichnaya's evidence that she is right that they moved in the summer of 2011?
A. That would appear to be the case. I hadn't seen those dates. Yes, acknowledged those dates. If that is correct, yes.
Q. This is what your financial investor obtained so --
A. I know that, yes.
Q. If that is correct, and in fact D48 does stand for the proposition that they moved at some point between 31 May and 26 June, then that does give support to the proposition that in fact Mr Perepilichnyy was concerned with his address would now be on the police national computer as a result of his wife's actions, doesn't it?
A. That would give support to that, if that is correct, yes.
THE CORONER: Ms Hill, can you help me before we leave 250.

THE CORONER: Other than that --
MS HILL: The three bottom ones are 8 June, 23 May and 20 May, so I have drawn a line over the bottom three.
THE CORONER: Yes, just give me a minute.
MS HILL: It is that evidence, sir, taken with the unredacted D48 at page 121 that suggests they had in fact moved by 26 June. Because if you look at 121, it is a bit clumsily written but if that date is correct, 26 June they were in The Coach House by that date and then Ms Perepilichnaya's father dies I will be corrected but I think it is July or August, isn't it?
It is August.
Mr Pollard, it appears that that sort of analysis of the Western Union addresses and so on you are doing now for the first time, looking at it in that way, aren't you?
A. Well in terms of -- I am familiar with the content but the dates, I hadn't appreciated those dates in that left-hand column but I had seen the -- this before.
Q. Just looking briefly if I may further down the timeline,
the short timeline we have just given you, you were
aware on 29 November that the Swiss had been in touch,
as we know, about Mr Perepilichnyy being one of the main
targets or witnesses in connection with their case.
Then on 30 November Mrs Perepilichnaya drew your
attention to the voicemail, "Alexander, you did not do
what you promised you would do".
In relation to that, you explain that away don't you
by saying well she later told me this was a polite thing
and a judicial thing so I don't take it any further.
Is that right?
A. That what she told my officers, yes.
Q. Your evidence on Friday, page 105 of the transcript, was
that you essentially accepted that. Is that right?
A. Yes.
Q. Again, you are accepting one interpretation of that
threat but not applying an open mind and an objective
view, I would suggest to you.
A. No, that is not the case.
Q. 30 November, you were aware of the text message dated
6 November, "Alexander, you will go to prison" and there
is reference to 300,000 roubles. Again, on Friday you
said that you didn't have concern about that because he
carried on conducting himself in a normal way. Is that
right?
A. That was one message in June 2011.
Q. Yes.
There is then reference to the 5 December meeting
where again Mrs Perepilichnaya was recorded to say that
the issue about the second phone might have been because
of the threats her husband faced and, again, talked
about concerns of a similar nature to what had been said
before?
A. I think her concerns there were more around the
Hermitage as opposed to anything else, is my reading of
that report.
Q. Well your FLOs will give evidence about that, and the
coroners have their records --
A. That's right.
Q. -- but we have taken a note from page 420 of what was
said at that meeting.
There are then, as you have seen, the press articles
referring to the suggestion he was living abroad because
of his fears for his life, and meetings with Hermitage
on the 6th. The Swiss information about the airport
meeting, the Swiss information about the date to
Mr Stepanov, the 18 December letter from Hermitage about
the dossier and then the messages that we have taken you
to already from the Skype messages.
In addition to all of that material, I suggest to
you that you had evidence about Mr Perepilichnyy's own
behaviour that was worth consideration. Just see if we
agree on this: he had at least two telephones, is that
right?
A. Yes.
Q. He had multiple email accounts?
A. Three or four didn't he? Yes.
Q. Various other ways of communicating through Skype,
Whatsapp, Viber and things of that nature?
A. Yes.
Q. He had at least two passports?
A. Yes.
Q. Look back, please, at D48, page 120, volume 5.
A. Yes.
Q. Back in the intelligence report at page 120?
A. Hmm.
Q. Just bear with me a second while I find the correct part
of this document for you.
There is part of this document that gives three
different dates of birth for Mr Perepilichnyy --
THE CORONER: Sorry, we are in volume 5.
MS HILL: It is volume 5, it is the document that begins at
page 122, bear with me a second.
I am just trying to find the relevant part, just
bear with me, sir.
THE CORONER: Only because I have not got it in front of me I will look at it in a moment, but the flight data is that only as it were from flights direct from this country or --

A. No, the timeline, sir, we did six months' worth of flight travel. So started in May, so it shows when he has flown out of Heathrow to Ukraine, Ukraine back to Heathrow and then there are some gaps I think in May and gaps in July where he has gone out --

MS HILL: We can give the reference to the documents, sir.

THE CORONER: If he goes to Ukraine to Russia is that going to be --

A. No, I wouldn't have that data, no.

I think there was only one misspelling of the date of birth on the document at page 122, I think it said 15 July 1968 but all the other dates of birth appear to be 25 July 1968. So it is obviously a typo from Mr Perepilichny's date of birth.

MS HILL: Can I ask you to look instead, just dealing with the multiple dates of birth point. I have now found the reference I wanted to ask you about. If you look in the miscellaneous bundle, please, at page 67.

THE CORONER: What does it look like? Is it a policy --

A. It is an intelligence log.

MS HILL: It looks to be an intelligence report again. If you look at the top of page 67, does it not give on the face of it three different dates of birth for Mr Perepilichny?

A. On that document, yes.

Q. Between the end of 2009 and his death?

A. Yes, sir, yes.

THE CORONER: Does that mean that the inquiry that is made of the Border Agency included those three dates, do you see what I mean?

A. I do and again -- so this is, but what is not clear is where they have got those dates from.

THE CORONER: That is what I am asking. Has the inquiry gone in with his name and those as three possible dates of birth? Do you see what I mean?

A. Yes, as opposed to him giving those.

THE CORONER: As opposed to him giving them or the Border Agency giving it. Do you see what I mean?

A. Yes.

THE CORONER: Will there have been -- will this have been prompted by a request from Surrey for the answer? I imagine it would be.

A. It would have been, yes, so that may have been where we got -- I am not sure if we had a copy of his passport at that time or not, but that may have been where we may have got that information from if it was not clear on his exact date of birth, which is why those variations were given to search on. Because it is dated 18 December, this report.

MS HILL: Those date of births must have come from somewhere.

A. Yes, no, I agree they would have done, but I don't know where.

MS HILL: I think in fairness, sir, I have now established that that page of D48 is missing from the other version of D48 that we looked at.

Page 177

Page 178

Page 179

Page 180
Sir, that is one one needs to look at the redacted version in the miscellaneous bundle.

You have established already that he gave a different address at the Bristol hotel and when you interviewed the female person he had been with in Paris by email, forgive me another female person he had been with, not the person in Paris, she described him for your reference, volume 5, page 553, as a very closed person. Do you remember that part of the evidence? If you want to look it up --

A. Which?

Q. It is volume 5, we can just do two short points in here if I may, volume 5, page 553, that the person whose name is at 552 was spoken to by your officers.

A. I need bundle 4 ... thanks.

Q. It is a handwritten note, an extract from an officer's notebook, 552 is the name of the female who is interviewed. The coroner can read the interview but over the page she says in the middle of number 19 of the internal numbering at the bottom: "He said he never went out, had no friends."

Do you see that?

A. Yes.

Q. Over the page on page 20:

"He was a very closed person."

Do you see that?

A. Yes.

Q. Do you know what that website was?

A. No.

Q. Did anybody look into that or flag that with you?

A. No.

Q. You have said in your witness evidence that Mr Perepilichny was moving around and travelling in a way that did not give a pattern to his behaviour that an assassin could follow? Do you remember that part of your witness evidence -- forgive me, it's part of your report, paragraph 15.2 of your report.

A. Okay. Yes. Well I haven't got it but ...

Q. Take it from me, in your report for the learned coroner's note, page 588 of volume 2, you said that you didn't believe that Mr Perepilichny's behaviour was to a set pattern that an assassin could follow. Do you want to turn it up?

A. I've got bundle 5, volume 2, it is not at 588.

Q. If you want to look at your own report, it is in volume 2.

A. Oh right, okay.

Q. Do you take it from me that that is part of your report?

A. Okay.

Q. That you have said that you didn't believe he was displaying a pattern of behaviour that an assassin could follow, because he was travelling to different countries at different times and so on?

A. He was in -- yes, he did do extensive travel, yes.

Q. Yes, but doesn't the flipside also work? That because he was not living to a regular pattern, he was not going to the same office every day, things like that, that is exactly the sort of behaviour someone might not know a person's regular movement.

A. Not really no, because it was part of his business and his lifestyle, so no.

Q. You would say would you that there was nothing here an assassin could find because he was not doing the same thing every day?

A. Well, I am saying it would be very difficult if you don't know a person's regular movement.

Q. Overall, officer, in relation to this evidence of threats as set out on the timeline and in relation to Mr Perepilichny's own behaviour, I am suggesting to you that you are accepting at every turn an explanation that does not fit with him having fears or threats to him. Do you see what I am suggesting?

A. I see what you are suggesting, yes.

Q. Were you actually qualified to assess his behaviour and whether he was acting in a way that evidenced concerns about his safety or not?

A. I followed the evidence that was obtained during the inquiry. The overall totality of the evidence, so I mean I don't see anyone is assessed as ascertaining threats but that was my conclusion based on all of those inquiries.

Q. Mr Nemtsov, somebody I am sure you were familiar with evidence if they were trying to not show a pattern of the way they were acting?
A. That's correct, yes.

A. No, that is not right to reach that conclusion on that standard of proof. The results of the toxicology tests, that were very detailed, the conclusions of the experts that were reported to me showed there was no evidence that he had been poisoned or murdered. There was no evidence from post mortem he had been attacked, third party restraint or administered anything.

Q. You knew full well that Hermitage's position was one of concern that this man had in fact been the subject of threats and had in fact been murdered. You were keen to keep my clients out of the inquest, weren't you?

A. No, not at all.

Q. Generally you have been minimising the evidence of threats throughout your evidence and I would like to ask you some questions about why that might be.

A. No.

Q. Are you concerned about consequences for your own career, officer?

A. No.

Q. Are you concerned about the reputation of Surrey Police here?

A. No.

Q. It would be better, wouldn't it, for Surrey Police, if this was in fact a natural death, because then any of those failings at the beginning would have had no consequence?

A. No, not at all.

Q. This is a case in which, as your policy document notes, at page 578/22, “The Government have maintained an ambient interest in”, that is your phrase.

A. Where is that recorded, sorry?

Q. If you want to look in your notebook, it is 578/22 of volume 2, if you want to turn it up.

THE CORONER: Sorry, Ms Hill, say that again?
Day 6  Inquest into the death of Alexander Perepilichny  13 June 2017

1 MS HILL: Volume 2, page 578/22.
2 Do you see that?
3 Sorry forgive me these are not your notes, these are
4 the gold group meetings that you attended. This is what
5 the assistant chief constable has said, sorry, this is
6 not your words.
7 THE CORONER: 578/2?
8 MS HILL: 22, sir.
9 These are the notes of the gold group meeting that
10 you attended I think and it is said at 578/22 that OP,
11 that is Olivia Pinkney, the assistant chief constable,
12 has said that the ambient interest remains at a national
13 level in this case. That is right, isn't it.
14 A. That's correct, it did attract attention, yes, that's
15 right.
16 Q. Part of the reason for the gold group itself was because
17 of interest by the Home Office and the Government in
18 this case, yes?
19 A. A raft of reasons, as I explained earlier but yes, you
20 know, there was some interest as to whether or not this
21 inquiry was a murder. So yes there was -- and given the
22 background, quite rightly that did attract that level of
23 attention, yes.
24 Q. 578/22 notes:
25 "Richard Reilly at the Home Office is helping to

Page 189

Page 190

Page 191

Page 192

1 keep a sense of perspective within central Government.”
2 He was somebody who was briefed on occasion by the
3 assistant chief constable with input from you on what
4 was happening on this case, wasn't he?
5 A. Yes.
6 Q. Has there been any political interference in this case
7 by national Government?
8 A. No. There has not.
9 Q. The death of Mr Perepilichny occurred at a time didn't
10 it when the Cameron administration was trying to develop
11 trade links with Russia; is that not right?
12 A. I wouldn't know that level of detail I am afraid.
13 Q. Right. Briefly just take it from me but we can give you
14 a short news article to the effect that --
15 MS BARTON: Sir, an awful lot of this case put by Ms Hill
16 appears to be related to news articles and media
17 briefings, about which there is no evidence.
18 THE CORONER: He said there was no political interference --
19 I mean it is just, if you then suggest 10 kinds of
20 political interference and he says there hasn't been
21 any, it just gets into the press and the press say
22 "Officer denies this that and the other" and there is no
23 evidence for it at all, but then these things get
24 recycled, as we have seen, one newspaper publishes it,
25 then two more do and then the BBC picks it up and it

26 MS HILL: I will move on, sir.
27 A. Your position, officer, is that this has been a fair
28 and even-handed investigation, that there are no
29 concerns about protecting Surrey Police's reputation,
30 there has been no political interference. That is the
31 summary, isn't it?
32 A. That is the truth. There has been no interference and
33 as far as I am concerned I conducted a fair and open
34 thorough investigation to establish the facts, and that
35 is my position.
36 Q. Finally, my client is keen to make sure that if there
37 another death of this nature, that the investigations
38 are entirely thorough and clear from the very beginning.
39 Submissions may be made to the learned coroner about
40 a Regulation 28 report, because my client is keen to
41 ensure that if another Russian whistleblower dies and on
42 the face of it has no marks on his body, that the death
43 is nevertheless treated as suspicious from the very
44 beginning.
45 Have you since this death had any greater
46 understanding of the role of poisoning in some of these
47 cases?

48 (Pages 189 to 192)
Day 6  Inquest into the death of Alexander Perepilichny 13 June 2017

Questions from MR BEGGS

MR BEGGS: Mr Pollard, just going back to the question about whether there was any political pressure. You obviously cannot speak beyond your own knowledge, so can I just confine the question, were you placed under any pressure by any police colleagues to come to any particular conclusion?

A. No, sir, I wasn’t.

Q. You were taken by Mr Moxon Browne to a document which he also considering his purchase options?

was both looking to consider his rental options whilst

confident the question, were you placed under any pressure by any police colleagues to come to any particular conclusion?

A. Yes, sir.

Q. At the very top of that same page we also have Amanda Doby, from that which we believe to be an estate agent, being asked by Alexander re Pinebrook House “Do you think we can get better price for Pinebrook?” Do you remember that?

A. Yes.

Q. Did you find it in any way suspicious that the deceased was looking at that, might have chosen the more exclusive club rather than the David Lloyd club that someone like me might go to, do you see?

A. Yes, that would be --

THE CORONER: I mean it is just not going to -- I don't think that is going to help me at all. It depends how well somebody knows someone.

A. Yes, that would be --

MR BEGGS: You have tried to work it out, my Lord, from Google but I will try and get back to you on that, yes.

Q. Perhaps I would be permitted a mild indulgence at 4.50 to you the apparently suspicious proposition that the deceased had two telephones. Can I ask you this, how many senior police officers do you know who have two telephones?

A. Well I have two telephones, sir, and so do a number of colleagues.

Q. Yes. That he had multiple email addresses. How many senior police officers do you know that have a job email, sometimes two private emails, one for colleagues and one for friends and family? Are you familiar with that sort of situation?

A. Yes, that is not uncommon to have more than one email.

Q. You were also taken at bundle 5, page 552, for the learned coroner’s note, to an interview with a foreign lady who made the suggestion that the deceased was "a closed person", whatever that might mean. Do you recall?

A. Yes.

Q. It might be, might it not, that someone would be necessarily perhaps more discreet in their conduct if they were conducting an affair at the time?

A. Yes, that would be --

THE CORONER: I mean it is just not going to -- I don't think that is going to help me at all. It depends how well somebody knows someone.

MR BEGGS: There are 101 variables.

THE CORONER: Yes.

MR BEGGS: You were also taken to paragraph 15.2 of your concluding report and a little bit of it was put to you. Can I ask you to turn that up again, please, in bundle 9, the Pollard bundle -- forgive the use of the surname -- it is at page 122.

A. Is it the police core bundle?

Q. It is bundle 9 and some of us have called it the "Pollard bundle".

A. What page number was it?

Q. 122, mine has red numbers.

A. Sorry, right, okay. Yes.
Q. Can I just check, do you have the penultimate page of
your concluding report on 122?
A. 122, yes, sorry, yes, I do.
Q. If you just home in on paragraph 15.2.
A. Yes.
Q. Do you recall Ms Hill took you to the sentence saying:
"There was never a regular pattern of behaviour in
which any would be assassin could follow with any degree
of certainty in knowing where he would be at a given
time."
Do you see that?
A. Yes.
Q. It was suggested that that of itself might indicate,
I think the implication was sort of counter-surveillance
moves but if you look at the next sentence have you not
made clear that his use of particular services clearly
showed he was not seeking to keep a low profile or
remain anonymous. Is that right?
A. Yes, that's correct.
Q. Furthermore you went on to say that his extensive travel
didn't indicate, at least to you, that he needed to
remain in hiding as a result of any threats. That is
the full paragraph, isn't it?
A. Yes, it is.
Q. Do you recall that one of the members of your team that
did work on this case was the exotically entitled
Ekaterina Clark-O'Connell, if I have that right?
A. Yes, that's correct.
Q. At bundle 2, I think it is 724, she described the
deceased, having done some extensive research of his
private emails and so forth as, I quote, "He seemed
polite, calm, very clever, educated [and then perhaps
only this pejorative] and interested in football".
Do you see that?
A. Yes.
Q. Yes and so yet again we see independent individuals
identifying the deceased as being very clever.
Did you see anything to in any way conflict with
that conclusion? That he was a very educated, very
intelligent man?
A. No, I didn't, sir.
Q. We know from -- I'm sorry to have to navigate between
different bundles but from the hearing bundle, page 235,
I just wait for you to get there.
The numbering is top right of the page, the one I am
looking at anyway. (Pause)
A. Right.
Q. Do you have it? It is a part of an officer's report.
A. Right, I haven't got that, I am on different.
Q. Let me save time by saying we know that neither of his
mobile telephones had any PIN protection, do you recall
that?
A. Yes. That's correct.
Q. Perhaps it is too obvious to state but if one was
seeking to lead a furtive or frightened life it might be
that one would put the standard four- or six-digit PIN
protection on to one's mobiles, but he didn't do that?
A. No.
Q. You found, as I understand it, no evidence that he was
using pay-as-you-go phones?
A. No, they appeared to be -- well they were registered to
him.
Q. One of the Gmails on his iPhone was in his own name?
A. Yes, it was.
Q. The trip to Paris immediately preceding his death was
booked in his own name, as were the flights, as were the
hotels and so forth?
A. No.
Q. As far as one can tell, neither of his Skype names, one
is Alex and the other is not, but none of them made any
sophisticated attempt to disguise his true identity?
A. No.
Q. If he used a predecessor address for that Paris trip,
given the circumstances you know about, that wouldn't be
surprising, would it?
A. No, it wouldn't be, sir.
Q. You knew that there were at least three members of
regularly deployed staff by the Perepilichny household.
One was the gardener, do you recall?
A. Yes.
Q. There was no reason, was there, to have any suspicion
about the gardener since he came with the property, he
came with The Coach House?
A. As I understand, yes.
Q. As far as you could tell, the deceased did not
conceal his name from either the driver that he -- the
drivers that he regularly used or indeed the cleaner?
A. No, he didn't.
Q. Nor did he conceal his name from the landlord that he
was renting from?
A. No.
Q. Nor indeed from the St George's Hill estate itself?
### Day 6

**Inquest into the death of Alexander Perepilichny**

13 June 2017

<table>
<thead>
<tr>
<th>Page</th>
<th>A. No, he didn't.</th>
<th>Q. There was no security of any description in place by the deceased for the welfare of his children, was there?</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Q. There was no security of any description in place by the deceased for the welfare of his children, was there?</td>
<td>A. No -- well, save for a house alarm but that was already installed with the property, they didn’t install that.</td>
</tr>
<tr>
<td>3</td>
<td>Q. That came with the property and I think in fact, as it happens, Mrs Perepilichnaya did not even know how to use it?</td>
<td>A. That's correct, yes.</td>
</tr>
<tr>
<td>4</td>
<td>Q. Going back to, because we have seen evidence, it is in buried in the documents, that he adored and looked after his children very well and there was no indication at all that he saw fit to give them any special security whatsoever?</td>
<td>A. No.</td>
</tr>
<tr>
<td>5</td>
<td>A. No, he didn't.</td>
<td>A. No.</td>
</tr>
<tr>
<td>6</td>
<td>Q. As far as his regular trips abroad are concerned, which you have itemised in, amongst other things, a flight schedule. There is no evidence, is there, that he used one of the higher grade executive chauffeur companies that can provide specialist security?</td>
<td>Q. As far as his regular trips abroad are concerned, which you have itemised in, amongst other things, a flight schedule. There is no evidence, is there, that he used one of the higher grade executive chauffeur companies that can provide specialist security?</td>
</tr>
<tr>
<td>7</td>
<td>A. No, he used the same chauffeur.</td>
<td>A. No, he used the same chauffeur.</td>
</tr>
<tr>
<td>8</td>
<td>Q. Just we make good that point, none of the drivers he used were specialist, they were not ex-job, ex-police or ex-army?</td>
<td>Q. Just we make good that point, none of the drivers he used were specialist, they were not ex-job, ex-police or ex-army?</td>
</tr>
<tr>
<td>9</td>
<td>A. No, they weren't sir.</td>
<td>A. No, they weren't sir.</td>
</tr>
<tr>
<td>10</td>
<td>Q. You know such firms are plentiful, aren't they?</td>
<td>A. Yes, there are those that provide additional security but this was a standard chauffeur company and he asked for no particular security arrangements, just a driver.</td>
</tr>
<tr>
<td>11</td>
<td>Q. There was nothing like using different routes to Heathrow each time or anything like that?</td>
<td>Q. There was nothing like using different routes to Heathrow each time or anything like that?</td>
</tr>
<tr>
<td>12</td>
<td>A. No.</td>
<td>A. No.</td>
</tr>
<tr>
<td>13</td>
<td>Q. Just to develop that point, in fact, I think on the morning of the last trip, he used a Ford Mondeo to go to Heathrow, and without disparaging Ford that may not be the best car to choose if you are looking at getaway pursuit -- you are smiling because you have probably had to drive them on the job but it is not the obvious choice is it of someone that thinks he is under threat of death?</td>
<td>Q. Just to develop that point, in fact, I think on the morning of the last trip, he used a Ford Mondeo to go to Heathrow, and without disparaging Ford that may not be the best car to choose if you are looking at getaway pursuit -- you are smiling because you have probably had to drive them on the job but it is not the obvious choice is it of someone that thinks he is under threat of death?</td>
</tr>
<tr>
<td>14</td>
<td>A. No, it is not.</td>
<td>A. No, it is not.</td>
</tr>
<tr>
<td>15</td>
<td>Q. There was no evidence -- as you have said the different routes, no evidence of different leaving times, no evidence of using different car parks at Heathrow, anything like that at all?</td>
<td>Q. There was no evidence -- as you have said the different routes, no evidence of different leaving times, no evidence of using different car parks at Heathrow, anything like that at all?</td>
</tr>
<tr>
<td>16</td>
<td>A. No.</td>
<td>A. No.</td>
</tr>
<tr>
<td>17</td>
<td>Q. It is clear, isn't it -- indeed Ms Hill took us to the very document which amongst others illustrates this -- if he is contemplating renting at 25,000 a month, £25,000 a month, it is abundantly clear from what you saw that he could easily have afforded any of the protective measures that I have just taken you through, could he not?</td>
<td>Q. It is clear, isn't it -- indeed Ms Hill took us to the very document which amongst others illustrates this -- if he is contemplating renting at 25,000 a month, £25,000 a month, it is abundantly clear from what you saw that he could easily have afforded any of the protective measures that I have just taken you through, could he not?</td>
</tr>
<tr>
<td>18</td>
<td>A. Yes, that's correct.</td>
<td>A. Yes, that's correct.</td>
</tr>
<tr>
<td>19</td>
<td>Q. But there was literally zero evidence of any such measures in any aspect of his life?</td>
<td>Q. But there was literally zero evidence of any such measures in any aspect of his life?</td>
</tr>
<tr>
<td>20</td>
<td>A. That's right.</td>
<td>A. That's right.</td>
</tr>
<tr>
<td>21</td>
<td>Q. Contrary to the suggestion that you might have been under pressure to come up with a natural cause, no third-party involvement conclusion, can I ask you to contemplate this: if you had found that he had been assassinated, might that, putting it rather bluntly, Superintendent, might that have rather enhanced your career as a police officer, if you had been, &quot;Superintendent Pollard is the detective that proved the assassination&quot;, that would have been, it might be thought rather in your favour to say that?</td>
<td>Q. Contrary to the suggestion that you might have been under pressure to come up with a natural cause, no third-party involvement conclusion, can I ask you to contemplate this: if you had found that he had been assassinated, might that, putting it rather bluntly, Superintendent, might that have rather enhanced your career as a police officer, if you had been, &quot;Superintendent Pollard is the detective that proved the assassination&quot;, that would have been, it might be thought rather in your favour to say that?</td>
</tr>
<tr>
<td>22</td>
<td>A. Well, I mean from my perspective, and without -- just from a purely professional perspective, it would have been a lot easier if he had have been murdered and from a professional perspective it would have been a very interesting inquiry to have worked on to establish who was responsible, but, well, if I am blunt, it mattered not to me whether he was murdered or not. I was asked to do an inquiry, I conducted an inquiry, I was asked to carry out detailed tests, I did carry out detailed tests and those were my conclusions.</td>
<td>A. Well, I mean from my perspective, and without -- just from a purely professional perspective, it would have been a lot easier if he had have been murdered and from a professional perspective it would have been a very interesting inquiry to have worked on to establish who was responsible, but, well, if I am blunt, it mattered not to me whether he was murdered or not. I was asked to do an inquiry, I conducted an inquiry, I was asked to carry out detailed tests, I did carry out detailed tests and those were my conclusions.</td>
</tr>
<tr>
<td>23</td>
<td>Q. Does it come to this, that despite that it might have been rather more dramatic had you had a conclusion of murder, you followed only the evidence rather than media speculation, is that fair?</td>
<td>Q. Does it come to this, that despite that it might have been rather more dramatic had you had a conclusion of murder, you followed only the evidence rather than media speculation, is that fair?</td>
</tr>
<tr>
<td>25</td>
<td>MR BEGGS: Thank you very much.</td>
<td>MR BEGGS: Thank you very much.</td>
</tr>
</tbody>
</table>

**Questions from MS BARTON**

1. What are your qualifications and experience in the field of security? Have you worked with similar cases in the past?
2. Can you explain the importance of security measures in high-profile cases?
3. How do you ensure the confidentiality and privacy of the individuals involved in such investigations?
4. What role does the analysis of financial transactions play in establishing the motives behind a high-profile death?
5. How do you handle media inquiries and the potential impact on the investigation process?
**A.** Yes, that's correct.

**Q.** If the material which they supply becomes evidentially useful, is there a process by which material supplied for intelligence purposes only can be converted to evidential use?

**A.** That does apply, yes, that's correct.

**Q.** Is that particularly true of financial institutions?

**A.** It can be. I mean in this case, as I say, initially it was for intelligence purposes only, however we did review that and I did review that with the department where that came from, in terms of the police department. And based on that, the passage of time, they were satisfied I could disclose that without having to make any PII application and having then disclosed it, it meant that the more populated spreadsheet was equally disclosed.

**Q.** The reason that the material entries were removed from one of the versions of the sheet was not because the police wanted them out but because the organisation supplying them wanted them removed; is that correct?

**A.** Yes, where I got them from had asked that I did not supply them wanted them removed; is that correct?

**Q.** If we look at the CAD message, we might go to this page 22.  Again I don't think you need to go to it.

**A.** It does. It uses the wrong spelling of the Christian name and I think there is a Y that is missing off the surname I believe.

**Q.** Thank you.

**Q.** Turning now to open source material, you were taken to the Barron's article at bundle 1, page 385. That made reference to open source material at that date. Do you know what open source material was in fact available on the date of Mr Perepilichnyy's death?

**A.** No, I don't, sir.

**Q.** Is it right that his death in fact created a lot of online material over the weeks, months and years that followed?

**A.** Yes, that would appear to be the case, sir.

**Q.** You were taken to the Barron's article at bundle 1, page 22. Again I don't think you need to go to it.

**A.** That article in fact, as you pointed out, uses the wrong spelling for Mr Perepilichnyy's name, doesn't it?

**Q.** Well, it was established that he had been over there with an acquaintance. The receipts and credit card information suggested that he was just there with himself and another. And the meeting with the experts on 17 December did not raise any concerns about there being any requirement to conduct any forensic analysis or tests in Paris.

**A.** It does. It uses the wrong spelling of the Christian name and I think there is a Y that is missing off the surname I believe.

**Q.** If one searched with the proper spelling of Mr Perepilichnyy's first name and surname, it is far from clear that that article would even come up, if it were on the internet as open source?

**A.** That would appear to be -- that could be the case, yes.

**Q.** If we look at the CAD message, we might go to this briefly, please, in the witness bundle at page 132, do we there see at 18.08 reference to the Expierian details and then reference to the open source details that were being sought by the RIO officer?
Q. I am going to ask you to look at that because there may be an important entry on it, it is at bundle 9, page 91, sir, and it is policy number 34.

A. I don't think I've got bundle 9 have I? I probably will have, I've got most of them but not bundle 9.

Q. Bundle 9, please, that is the police core bundle.

A. Okay, right. Which is the page number?

Q. Page 91.

A. This is your policy entry number 34; is that right?

Q. Yes.

A. That's correct.

Q. I just want to ask you before we go to the detail of this, have you ever in any inquiry instructed the multidisciplinary medical team or team of medical experts that you instructed in this case?

A. Have I?

Q. Have you ever before --

A. Yes.

Q. -- in an inquiry of any sort instructed the multidisciplinary team that you instructed in this case?

A. No. I have -- this was a first for me and for a number of other colleagues for that matter. The actual number of experts all in one room to discuss one case of a sudden death is very unique and even in a murder inquiry you wouldn't necessarily have that number of experts all together to discuss the circumstances, you may have one or two.

Q. What did you ask that team of experts to do?

A. I asked that team of experts to go and find me or tell me: whether Mr Perepilichnyy had been poisoned or not; and if he had have been poisoned, did that amount to his murder; and if he had have been poisoned or murdered by poisoning, where that would likely to have been taken place, when, how, and that would have then set other lines of inquiry.

Q. In the context of your decision not to conduct inquiries in Paris, will you just go to bullet point 4, please, and tell us there what you were told by the experts at that time as to controlled release poison?

A. Right:

"The terms of any controlled release medicines that could be administered bringing about a delayed reaction are quite unusual and can be eliminated."

Q. That what you were told at the time, is it?

A. That is what I was told at the time and that is what I recorded in my policy file.

Q. Then at paragraph 5 of that, were the experts asked whether there were substances that experts could categorically identify which could be tested for and what was their response?

A. Bullet point 4 is:

"Having listened to that advice and taken all of the circumstances into account, my decision is ...

Q. The one above. In fact we have two files, we will get to that one in a moment.

A. "At this stage there are no substances that experts can categorically identify could be tested for and so any such exam would purely be a fishing trip."

Q. Were you controlling what the experts were doing or was the other way round, did they decide what they did?

A. Yes, I was taking their advice.

Q. The conclusions from that I think you were just going to draw the threads together for us, having listened to --

A. Yes, so having listened to that advice and taken all the circumstances into account, my decision is that this is not a legitimate proportionate viable line of inquiry that will support investigation.

Q. With that you are talking about Paris?

A. Yes.

Q. Thank you.

Then lastly, Ms Hill was putting to you, somewhat...
A. I've got --
Q. And the electronic numbering?
A. Yes.
Q. Paragraph 35?
A. Yes.
Q. A question is asked of the joint experts: was there any evidence of third-party involvement in the death at post mortem?
A. Yes.
Q. Paragraph 35?
A. Yes.
Q. Indeed is it your evidence, Superintendent Pollard, that that has been the position of the pathologists from day one till now?
A. Yes, sir.
Q. Did that inform the way in which you conducted your investigation and identified lines of inquiry?
A. Yes.
Q. Similarly, in terms of toxicology, during your investigation did the toxicologist at any stage identify any poison within Mr Perepilichnyy's system?
A. No.
Q. Did they identify any manner in which that poison could have been administered given the pathological findings?
A. No.
MS BARTON: Thank you.
MR SKELTON: Sir, I have a couple of points of clarification about Mr Pavlov’s movements that I would like Mr Pollard just to see if I may -- you, sir, may have some questions as well before or after.
A. Yes, sir.
Q. Did that inform the way in which you conducted your investigation and identified lines of inquiry?
A. Yes.
Q. Similarly, in terms of toxicology, during your investigation did the toxicologist at any stage identify any poison within Mr Perepilichnyy's system?
A. No.
Q. Did they identify any manner in which that poison could have been administered given the pathological findings?
A. No.
MR BARTON: Thank you.
MR SKELTON: Superintendent Pollard, the miscellaneous bundle, if you could go to tab 7, please, do you have that? It is a letter from the Government Legal Department to Mr Travers, the senior coroner, dated 4 May 2016. It is a response to requests from his office for information regarding the movements of certain individuals, one of whom includes Andrei Pavlov.
A. Yes.
Q. Would you just read out that, save for the date of birth, please.
A. Sorry, read out --
Q. The section on Mr Pavlov?
A. Yes right so:
"Visit visa valid from 24 July 2012 to 24 July 2017.
Departed the UK London Heathrow on 11 November 2012 at 21.40 and travelled to Russia. We hold no information about his travel or duration of his stay in the UK prior to his departure on 11 November 2012."
Q. I think you said his travel, I think you mean his arrival, I think it was a misreading, "no information about his arrival"?
A. Sorry, you are correct, yes, "We hold no information about his arrival", sorry, that is correct.
Q. Do you mind turning on to section 11, please, where there is another letter, again from GLD with some follow up answers on Mr Pavlov.
A. Yes.
Q. Do you see that, that is a letter again to Mr Travers dated 24 June 2016.
A. Yes.
Q. The large final paragraph, could you read that out for me, please?
A. So:
"Andrei Pavlov, Home Office data indicates that Pavlov was a frequent traveller to the UK both before and after 11 November 2012. Our checks in response to the coroner’s request of 6 April indicated that Pavlov departed the UK on 11 November 2012. Our records indicate that he returned to the UK on 12 November 2012 and departed again on 14 November. He returned to the UK on 25 November and departed on 27 November. He returned on 23 January 2013 and departed on 25 January. "This pattern of frequent short visits to the UK is consistent both before and after 11 November 2012."
MR SKELTON: Thank you.
THE CORONER: He left on the 11th but comes straight back on the 12th?
A. Yes.
Q. Thank you very much.
A. Thank you, sir.
THE CORONER: Only if you are very keen.
MR SKELTON: We do need a short break, sir.
THE CORONER: We might need a long break.
MR SKELTON: A short break, I think it is going to be necessary at least for the shorthand writer.
THE CORONER: Yes.
MR SKELTON: DC Burden, sir, I think has waited patiently all day and I think he is caught up in a murder trial from tomorrow, so it may be that if we could try and squeeze him in, I know --
MR MOXON BROWNE: Sir, I believe I gave a rather gloomy forecast for the length of time I would be with this
THE CORONER: Is that alright with everybody if we have a go? All right, then do we need a break now?

MR SKELTON: We do, for five or ten minutes.

THE CORONER: Yes, certainly.

(5.20 pm)

(A short adjournment)

(5.35 pm)

MR SKELTON: Sir, the final witness of today is Detective Constable Burden.

THE CORONER: Yes.

DC LAWRENCE BURDEN (sworn)

Questions from MR SKELTON

MR SKELTON: Thank you. Could you state your full name to the court, please.

A. Yes, I am Detective Constable Lawrence Burden.

Q. At the time that you were involved in the investigation into Mr Perepilichny’s death, what was your status in Surrey Police?

A. I was the detective constable working in the criminal investigation department at Staines police station.

Q. There are three documents I think that you have in the bundle that we are putting before the court for the purposes of this hearing, you will find them in the witness bundle under tab 26, if you could be assisted with getting a copy -- thank you.

A. Thank you.

Q. Do you see those?

A. Yes.

Q. The first one under tab A is an officer’s report entitled “DC Burden re summary of investigation to date/initial actions”.

A. Yes.

Q. That is your report on Operation Daphne. Who did you produce that report for?

A. Well that is the report that was put on the Surrey Police crime and information system following the officers’ attendance on 10 November.

Q. Were you aware when you completed that report, it is dated 28 November, that you were handing over to a senior officer to take over the investigation?

A. Yes.

Q. A new SIO, Pollard?

A. That’s correct, yes.

Q. The second document is a copy I think of your notebook, so it is a transcription copy. Do you see that, under B?

A. Yes.

Q. That is your notebook from your attendance at the scene of Mr Perepilichny’s collapse?

A. That’s correct, yes.

Q. On Saturday, 10 November?

A. Yes.

Q. Thirdly, a witness statement dated 2 July 2016, so that presumably was produced in the context of the inquest which was then being held in Surrey Coroners’ Court?

A. Yes.

Q. That sets out your involvement with the investigation up to 29 November 2012?

A. That is correct, yes.

Q. Were you effectively in charge of the investigation -- we will come on to who made a few decisions early on at the scene, were you effectively in charge of the investigation during that period?

A. Yes, I was termed as the officer in charge of the investigation.

Q. I am right, you attended the scene but there were key decisions made in fact by DS Seear and DCI Collwood at the scene weren’t they, as the senior officers?

A. That’s correct.

Q. You would defer to them on the reasons for those decisions?

A. Absolutely, yes.

Q. There is one specific thing I would like to ask you about, and that is your contact with Mr Gherson. Is it right that you were aware that Mr Gherson had been in contact with the police and a note had been taken of some contact by DS Drinkwater?

A. That’s correct, yes.

Q. Could I just show you the contact and ask you whether you were aware of what he had said. It is in the same bundle, if you look under tab 15D, you will see a -- it starts at page 138 and what I would like to take you to is on page 144.

This is a long computerised printout, it is in a less than easy format to read, capitalised letters which you are probably more familiar with reading than the rest of us. There is contact with Mr Drinkwater from Mr Gherson, were you aware of that contact?

A. At the time I wasn’t, no, I believe I was on a rest day when that contact was received, but when I was next in work I would have read the report and seen the update on there.

Q. Were you briefed then directly by DS Drinkwater or would you have picked this up from the computer system?

A. I believe I picked it up from the computer system.

Q. What we see here is what you knew?

A. Yes.

Q. Then were you aware that Mr Gherson had provided his
Day 6  Inquest into the death of Alexander Perepilichny  13 June 2017

Q. Is that PC Lloyd, is that?
A. That's correct, yes.

Q. By Mr Gherson in this conversation?
A. Yes.

Q. That specific concern, does that arise post death?
A. Yes -- well, I was made aware of it post death.

Q. If you go further down, you can see that you were contacted and given contact details for Mr Gherson in order to have a discussion with him?
A. That's correct, yes.

Q. Is that PC Lloyd personally so having, once he had spoken to Mr Gherson, he may well have either telephoned me or sent me an email but ultimately he updated the report as well.
A. Yes.

Q. That's what I was told.
A. That is what I was told.

Q. That note we then see on page 145, that starts on Wednesday, 21 November, "Contact received from Roger Gherson", is that your note that carries on overleaf to page 146 about two-thirds of the way down?
A. Yes -- well, I was made aware of it post death.

Q. You are aware of the contact from Mr Gherson acting on behalf of Mrs Perepilichnaya and you are aware that there is involvement with the death of or into the -- in the investigation into the death of Mr Magnitsky, who died in Russian custody. He states Mrs Perepilichnaya is very distressed and worried about other incidents and she has told Mr Gherson that some people said to her they know where she and the kids live?
A. Yes.

Q. That specific concern, does that arise post death?
A. Yes -- well, I was made aware of it post death.

A. That is what I was told.

Q. Did you have any further involvement with Mr Gherson at all during the time when you were involved with the investigation?
A. No, from what I recall this conversation is the last contact that I had with him.

Q. Is there anything else you can assist this court with other than Mr Gherson's contact with the police?
A. I don't recall any conversation around that.

Q. He didn't say that Mr Perepilichnaya had expressed concern about his address being known or being contained within the police national computer as a result of Mrs Perepilichnaya's contact with the police?
A. I don't recall anything like that, no.

Q. Did you get the impression that Mr Gherson was being defensive or deliberately withholding information from you when you spoke to him?
A. I don't recall any conversation around that.

Q. Is it right that that results in effectively a nil return, as in nothing of interest?
A. That's correct, yes.

Q. Can you remember if he elaborated on that?
A. I don't remember if he elaborated on it but I would like to think if he had provided any more information I would have put it on to the report.

Q. Did you ask him directly about any knowledge he might have had about Mr Perepilichnaya's safety or Mr Perepilichnaya's concerns for his safety, save for the threats?
A. I don't recall any conversation around that.

Q. Did Mr Gherson say that he had had cause to contact the police himself some time after Mrs Perepilichnaya came to their attention in 2011?
A. I don't recall any conversation around that.

Q. He didn't say that Mr Perepilichnaya had expressed concern about his address being known or being contained within the police national computer as a result of Mrs Perepilichnaya's contact with the police?
A. I don't recall anything like that, no.

Q. Did you request special branch carry out checks, I think you record that on page 146, to be made and his immediate family, is that correct?
A. That's correct, yes.

Q. Is it right that that results in effectively a nil return, as in nothing of interest?
A. That's correct, yes.

Q. Did you have any further involvement with Mr Gherson at all during the time when you were involved with the investigation?
A. No, from what I recall this conversation is the last contact that I had with him.

Q. Is there anything else you can assist this court with when it comes to the evidence as to the endangerment of Mr Perepilichnaya's life or threats to that life?
A. No, not that I can think of.

MR SKELTON: Thank you.

THE CORONER: Can you just help with this, do you have 26, so divider 26C which is your statement, do you remember, of 2 July 2016?
A. Yes.

Q. You see his answer confirming no specific threats have been made?
A. Yes.

Q. Can you remember if he elaborated on that?
A. I don't remember if he elaborated on it but I would like to think if he had provided any more information I would have put it on to the report.

Q. Did you ask him directly about any knowledge he might have had about Mr Perepilichnaya's safety or Mr Perepilichnaya's concerns for his safety, save for the threats?
A. I don't recall any conversation around that.

Q. Did Mr Gherson say that he had had cause to contact the police himself some time after Mrs Perepilichnaya came to their attention in 2011?
A. I don't recall any conversation around that.

Q. He didn't say that Mr Perepilichnaya had expressed concern about his address being known or being contained within the police national computer as a result of Mrs Perepilichnaya's contact with the police?
A. I don't recall anything like that, no.

Q. Did you get the impression that Mr Gherson was being defensive or deliberately withholding information from you when you spoke to him?
A. I don't recall any conversation around that.

Q. Is it right that that results in effectively a nil return, as in nothing of interest?
A. That's correct, yes.

Q. Did he make any exertion of client confidentiality or legal privilege?
A. Again, not that I can remember.

Q. You requested special branch carry out checks, I think you record that on page 146, to be made and his immediate family, is that correct?
A. That's correct, yes.

Q. Is it right that that results in effectively a nil return, as in nothing of interest?
A. That's correct, yes.

Q. Did you have any further involvement with Mr Gherson at all during the time when you were involved with the investigation?
A. No, from what I recall this conversation is the last contact that I had with him.

Q. Is there anything else you can assist this court with when it comes to the evidence as to the endangerment of Mr Perepilichnaya's life or threats to that life?
A. No, not that I can think of.

MR SKELTON: Thank you.

THE CORONER: Can you just help with this, do you have 26, so divider 26C which is your statement, do you remember, of 2 July 2016?
A. Yes.

Q. You see his answer confirming no specific threats have been made?
A. Yes.

Q. Can you remember if he elaborated on that?
A. I don't remember if he elaborated on it but I would like to think if he had provided any more information I would have put it on to the report.

Q. Did you ask him directly about any knowledge he might have had about Mr Perepilichnaya's safety or Mr Perepilichnaya's concerns for his safety, save for the threats?
A. I don't recall any conversation around that.

Q. Did Mr Gherson say that he had had cause to contact the police himself some time after Mrs Perepilichnaya came to their attention in 2011?
A. I don't recall any conversation around that.

Q. He didn't say that Mr Perepilichnaya had expressed concern about his address being known or being contained within the police national computer as a result of Mrs Perepilichnaya's contact with the police?
A. I don't recall anything like that, no.

Q. Did you get the impression that Mr Gherson was being defensive or deliberately withholding information from you when you spoke to him?
A. I don't recall any conversation around that.

Q. Is it right that that results in effectively a nil return, as in nothing of interest?
A. That's correct, yes.

Q. Did he make any exertion of client confidentiality or legal privilege?
A. Again, not that I can remember.

Q. You requested special branch carry out checks, I think you record that on page 146, to be made and his immediate family, is that correct?
A. That's correct, yes.

Q. Is it right that that results in effectively a nil return, as in nothing of interest?
A. That's correct, yes.

Q. Did you have any further involvement with Mr Gherson at all during the time when you were involved with the investigation?
A. No, from what I recall this conversation is the last contact that I had with him.

Q. Is there anything else you can assist this court with when it comes to the evidence as to the endangerment of Mr Perepilichnaya's life or threats to that life?
A. No, not that I can think of.

MR SKELTON: Thank you.

THE CORONER: Can you just help with this, do you have 26, so divider 26C which is your statement, do you remember, of 2 July 2016?
A. Yes.
Day 6 Inquest into the death of Alexander Perepilichny 13 June 2017

Q. You would have recorded your conversation with Mr Gherson within a pretty short time of having had it?
A. I actually think that the update I put on to the report, I put on the following day which was 22 November.
Q. Yes.
A. That's correct.

Q. Yes.
A. I did, yes.

THE CORONER: You spoke to Mrs Perepilichnaya as it turned out, didn't you?
A. Yes.

Q. You want to see Mrs Perepilichnaya on the very evening of Alexander's death, and you were in the house for a little while talking to her. She told you, as the coroner has just reminded you, that before going jogging Alexander had gone to the St George's Hill Tennis Club?
A. That's right.

Q. I don't know whether you were in court when Mr Beggs was asking questions of Mr Pollard?
A. I have been today, yes.

Q. You are not attempting in 2016 to remember but you are rather consulting much more contemporaneous records in order to make this statement; is that fair?
A. Yes, that's correct.

THE CORONER: That is what she mentioned?
A. Yes, that's correct, yes.

Q. Are you pretty confident that, having regard to the fact that you did make a contemporaneous note, that Mrs Perepilichnaya was telling you that her husband had been to this club before going on his jog?
A. Yes, I am confident that is what she told me and that is what I've got in my pocket notebook.

Q. Thank you.
A. As far as the conversation with Mr Gherson is concerned that you have told us about, Mr Skelton was taking you through that just a moment ago. Will you take it from me that what you have written here on page 319 is word for word, literally word for word, from what Mr Gherson was really saying was we need to get some toxicology done in order that there can be a funeral fairly quickly, and so he was not really saying she is distressed in the way that you have described but what he was saying was, "We have got to have a funeral so get your testing done quickly". Does that ring any bells with you?
A. That's your right.

THE CORONER: All your documents that we looked at they are true to the best of your knowledge and belief?

THE CORONER: Thank you. Yes.
A. That's correct, yes.

THE CORONER: What you recorded at the time in the occurrence inquiry log?
A. Sorry, which page number is it?
Q. Yes.

Q. I'm sorry, we are on the second page of your statement and I have checked what you said here about what Mr Gherson told you, and for reasons that you have explained, it is actually word for word from what was written in the occurrence log inquiry. When you wrote this statement you had that log by you obviously and were able to be fairly confident that you had that right?
A. That's correct, yes.

THE CORONER: All your documents that we looked at they are true to the best of your knowledge and belief?
A. They are to the best of my knowledge, sir, yes.

MR MOXON BROWNE: That inquiry log is pretty well contemporaneous, as I understand it, you write things in that as and when they occur.
A. Yes, that's correct.

Q. You would have recorded your conversation with Mr Gherson within a pretty short time of having had it?
A. I actually think that the update I put on to the report, I put on the following day which was 22 November.
Q. Yes.

A. That's correct.

Q. They didn't seem to have treated it with very great urgency. What you recorded is not, as I think...
Day 6  Inquest into the death of Alexander Perepilichny  13 June 2017

Mr Skelton put to you, a nil return, what they said was, "No adverse trace", in other words there was nothing on the, on their record which casted anything negative or adverse about Mr Perepilichny?

A. That's correct, it was actually --

Q. Do you know what in fact the information was? I have seen a record but it has largely been blanked out so it is hard to tell?

A. I haven't seen anything.

MR MOXON BROWNE: You haven't seen that, no.

Thank you very much indeed.

Questions from MS HILL

MS HILL: DC Burden, just very briefly. You were the investigating officer in the case were you prior to Mr Pollard's involvement?

A. That's correct, yes.

Q. It was on your watch was it that the Hermitage letter of 17 November 2012 was received by the force?

A. Yes, that's correct.

Q. It is right isn't it that that letter doesn't appear to have been logged on the police log at all; is that right?

A. I believe there is a mention of a letter, an entry from somebody in the contact centre because I believe what happened was it got emailed into the contact centre, they obviously worked out that it belonged to this report and forwarded it on to myself.

Q. You didn't do very much in response to that letter, did you, apart from note the contents as by way of background. Is that right?

A. That's correct, and I forwarded it on to senior officers as well.

Q. Which senior officers did you send it on to?

A. I don't remember.

Q. You are aware, aren't you, that it has later been concluded by the Surrey Police gold group that more should have been done in response to that letter?

A. I have not been party to any gold group meetings, I am not aware of any outcomes or anything.

MS HILL: I see.

All right, thank you.

MS BARTON: Nothing thank you sir.

THE CORONER: All right, thank you very much and I am sorry you had such a long wait. Thank you very much for your patience.

A. Thank you.

THE CORONER: All right I am very grateful to everybody, including the staff, for staying on so late.

If I can just toss a small grenade in and then leave in a hurry. It is possible there will be something coming in here at about 9.00 this evening. But please I don't think there is any need, I am going to say there is no need to move everything out, but if you could just sort of pack things up -- not pack them up even but turn things face down so that if -- and if I am here I will try and ensure that, I might well have to be here but I will try and make sure if perhaps people can be in the back rows, but it is possible some people will just be in here. There is a visit that is going on, you will see it is starting out there now I think.

If you could make sure everything is moderately -- it is not really the tidiness I am more concerned about, but just that there is nothing face up. I will make it plain, even if it is not me myself that if people are in near they are not to turn papers over and so on. If you could do that, that would be a good compromise.

I'm sorry it keeps happening.

Good, thank you all very much.

(5.55 pm)

(58 (Pages 229 to 232)

THE Inquest adjourned until 10.00 am the following day)
Day 6  Inquest into the death of Alexander Perepilichny  13 June 2017
Day 6  
Inquest into the death of Alexander Perepilichny  13 June 2017

172:18 182:5,8  
190:16  
application 11:8  
13:2 60:2 168:21  
205:14  
applications 60:1,4  
60:5 61:2,5  
applied 18:20,25  
45:6 46:20  
applies 7:18 19:19  
apply 19:16 205:6  
applying 47:14  
173:17  
appriciate 8:5 59:9  
68:19,22  
apprciated 172:23  
apprach 98:6  
118:8 186:12  
approached 85:2  
118:10 121:3  
approaching 117:6  
136:10,12  
apropriate 90:22  
97:25 98:2 100:4  
163:1 186:11  
approved 109:4  
approximately 58:1 207:8  
April 43:19 55:5  
74:9 126:13,20  
127:11,11 143:17  
206:2 215:23  
area 49:21 77:5  
areas 10:18  
argument 90:20  
arrangement 143:24  
arrangements 202:7  
arrived 133:25  
arrival 215:6,7,9  
arrive 132:22  
arrived 21:20  
149:3,5  
arriving 94:4  
art 27:7 182:17  
194:15  
article 3:17 74:25  
75:10 83:22,24  
86:23 155:18  
156:1,9,24 157:3  
157:6,9 190:14  
206:11,13,20  
articles 39:18 40:1  
174:17 190:16  
ascertain 72:3  
ascertained 40:5  
ascertaining 184:22  
aside 51:1 61:23  
163:21  
asked 3:21 24:18  
24:20 30:6 31:2  
36:16 40:22 48:1  
48:1,4 67:10 68:5  
70:22 75:4,25  
90:9 97:11 100:24  
101:8 102:7 112:2  
120:21 126:6  
132:15 135:4,24  
136:8 137:16,20  
137:22 142:2  
151:11 160:4  
161:15 167:16  
187:17,22,24  
193:17 202:6  
204:2,3 205:21  
207:24 208:12  
210:8 211:21 213:6  
222:23  
asking 12:13 17:8  
76:2 80:23 81:22  
88:25 94:4 107:14  
107:15 114:3  
121:4 128:15  
133:2 139:12  
165:11 180:2  
226:9  
aspect 22:19 24:6  
101:22 192:10  
203:9  
aspects 22:13 69:1  
assassin 183:2,9,18  
184:6 197:8  
assassinated 185:1  
203:15  
assassination 103:17 203:19  
assault 82:15  
213:14  
assertion 137:17  
asserts 34:21  
assess 184:17  
186:15  
assessed 184:22  
assessment 119:11  
assets 46:6,7 84:11  
assist 1:7 5:21 28:6  
73:25 79:3 85:5  
101:4 154:24  
160:5,23,24  
192:14 224:16  
assistance 32:10  
103:13,25 146:10  
160:16  
assistant 6:3,23,25  
9:18 10:17 189:5  
189:11 190:3  
assistants 70:1  
assisted 136:16  
218:1  
assisting 30:2 72:6  
associated 62:24  
65:19 91:10  
associates 16:5  
assume 26:17 56:14  
56:16 87:21  
113:22 115:25  
118:9 158:8  
assuming 94:12  
96:4 117:5 157:19  
assumption 116:5  
assumptions 12:14  
attach 38:3  
attached 47:9  
attack 82:14  
attacked 186:23  
attempt 111:9  
135:12 136:4  
137:4 143:22  
152:8 158:15  
199:19  
attempting 225:22  
attempts 99:8  
150:2 152:5  
atend 77:8  
attendance 218:14  
218:25  
atended 14:15  
143:16 189:4,10  
219:18  
atendees 15:11  
attending 149:20  
attention 4:23 7:17  
43:24 44:8,18  
58:3,9 70:1 77:24  
108:13 153:5  
173:6 189:14,23  
233:15 225:17  
Attorney 140:8  
attract 43:24 44:8  
58:3 189:14,22  
attracted 7:17  
attributable 71:5  
attribute 20:12  
attribution 17:16  
26:3  
August 39:10  
126:17 169:6  
172:16,17  
authorities 30:2  
44:4 70:15 71:13  
97:22 98:7 99:24  
103:12,13,16,21  
104:2,21 121:3  
140:11,25 143:18  
146:23 147:4,21  
automatic 91:1  
92:1 93:14
Day 6 Inquest into the death of Alexander Perepilichny 13 June 2017
Day 6  Inquest into the death of Alexander Perepilichny  13 June 2017
Day 6  Inquest into the death of Alexander Perepilichny  13 June 2017
Day 6  Inquest into the death of Alexander Perepilichny 13 June 2017

G

game 132:2
gap 136:23
gaps 177:8,9
gardener 200:12,15
Gareth 14:18
gate 92:24,25 94:1
gates 94:18
gather 109:17

gathered 95:8,17
gathering 19:16
111:18

gauged 61:1
46:5 47:12 83:1
General's 140:8
generally 24:13
105:19 129:19
188:5

generated 30:17
gentleman 14:15
194:19

George's 113:21
115:10 168:2
194:6,9,10,22
200:25 225:7,8,10
226:6
gateway 202:14
getting 12:11 53:22
71:9 132:24 169:7
218:2

Gherson 3:10 85:7
85:10,13,21
159:18,24 160:3,6
161:8,13 163:5
164:20 165:15
166:1,8,23 220:1
220:2,15,25 221:5
221:12,17,20
222:1,6,8,23
223:12,22 244:11
226:21 227:6,21
228:1,3,6,19

Gherson's 161:5
162:20,21
gist 34:14,25 35:2,5
35:10,12
give 47:25 48:5
103:25 112:25
131:12 142:19
144:12 156:14
158:11 160:15
171:19,23 172:9
174:12 177:10
178:1 183:1
187:24 190:13
201:13
given 6:4 7:17
11:16 14:7 15:13
28:14,15,25 30:3
32:4 33:22 34:15
42:19 47:22 48:2
58:21 58:10,21
63:3 68:2 69:13
74:2 77:24 78:19
79:5 88:10 100:22
119:16 123:16
124:13 135:11
142:3 152:1 154:9
159:8 161:23

164:25 169:4
173:1 178:13
180:17 185:10
189:21 197:9
200:7 212:4 214:3
221:5
gives 15:9 95:22
171:5,8,9 175:19
giving 35:4 40:4
50:14 70:9,15
71:12 82:20
109:13 131:6,7
140:9 144:10
171:3 180:5,6,7

GLD 215:11
gleaned 68:10
gloomy 216:24

Gmails 199:21
go 10:16 12:7 13:21
16:3 19:20 23:7,9
25:10,21 33:6
38:21 41:19 44:23
53:4 57:12 68:16
83:19,21 92:12
93:6,8 99:7 101:5
114:25 116:13
118:25 125:9
154:22 155:4
162:3 163:12
164:5,20 165:3
167:24 173:21
179:16,17 182:3
194:23 202:12
206:12,23 209:16
210:8,16 212:10
214:13 217:4
221:4
goes 93:15,16
114:10 177:11
going 2:24 6:22
23:12 29:5,8
37:10 48:25 61:17
78:12 82:21 86:23
89:18 95:1 117:9
127:1 131:12

141:23 143:6
144:2 177:11
183:23 186:15
191:3 193:2 196:9
196:10 201:10
208:17 209:1
211:16 216:17
225:10 226:5,17
231:2,9
gold 5:25 6:4,6,22
7:3,4 10 9:3,6,21
12:18 23:17 24:4
24:16 87:6,11
189:4,9,16 230:11
230:13
good 71:14 96:4
115:9 201:25
228:17 231:16,18

Google 37:21
182:16 195:8
government 108:12
108:19 188:20
189:17 190:1,7
214:14
grade 201:22
graded 36:25 58:22
59:3 139:11,15
Grand 53:5
granted 47:16
Granville 114:14
115:4,11
grateful 120:12
230:22
great 228:24
greater 191:23
grenade 230:24
ground 88:5
grounds 13:3
148:22


34:7 58:20 59:2
71:4 87:6,11
123:13 131:6
134:23 153:1
138:17,23 139:15
144:11 189:4,9,16
230:11,13

group's 9:6 12:18
groups 22:18 23:25
33:10 137:19
guided 12:16
119:19
gym 48:15,17 49:11
49:12,24 50:6,7
50:11 51:22 52:8
52:14 88:15 195:6
225:8
gymnasium 194:15

H

half 74:23 169:16
halfway 11:25
59:25
Hallet 12:12

hampered 76:24
83:2
hand 63:17 121:17

handed 62:23
112:23 124:5
155:21

handing 218:16

handset 62:24 63:3
63:16,17 64:4,12
64:14,16,18 65:2
65:3,15,16,18
69:7,9 121:16

handsets 67:4
123:4

handwritten 94:2
181:16

Hang 125:2 160:21

happen 185:6

happened 3:2
18:22 20:15 25:19
31:8 78:13 130:4

DTI  www.DTIGlobal.com  8th Floor, 165 Fleet Street
(+44)207 4041400
London EC4A 2DY
Roger 221:17
role 109:16 111:8
131:16 134:16
191:24
room 208:16,23
210:2
roubles 41:21
173:22
roughly 27:12
round 25:23 211:14
route 80:19
routes 202:8,21
routines 110:23
rows 231:8
Roy 67:23
Rudnick 3:10 4:14
8:2 14:1
ruling 10:25 11:8
run 15:16 52:3
170:18
runs 2:6 178:21
Rus.com 41:25
42:4,4 106:22,24
Russia 22:14 23:21
24:21 25:3 26:21
30:24 33:11 36:5
39:12 134:14
135:7 146:7 176:9
176:9,15,17,19,23
177:11 179:10
190:11 215:2
Russian 17:2 20:16
26:5 35:25 40:23
58:1 70:13 71:5
71:17,21 108:12
108:19,21 133:25
134:12 135:2
142:24 144:11,13
147:1,8,23 153:6
153:7,17 154:5
191:19 192:4
221:24
Russian/Ukrainian 40:19
Russians 19:18
S
safe 41:20 185:2,4
185:5
safety 30:1 38:10
154:13 159:21
162:25 163:10,24
164:18 167:9
184:19 223:9,10
Sainsbury's 56:21
sample 68:21
samples 5:12,17,18
5:20 118:15 119:2
119:2
sanctions 133:2
satisfied 37:12
62:11 142:2
205:13
satisfy 163:17
Saturday 219:3
save 2:6 198:25
201:4 214:20
223:10
saved 70:2
Savills 113:14
Savill 115:8
saw 88:13 117:24
201:13,16 203:4
saying 8:5,7,19
10:17 16:10,10
22:12 29:5 51:18
55:16 76:18 78:11
83:25 86:22
100:11 102:23
106:16 114:1
116:1 118:24
119:6 138:9
147:19 153:20
155:2 157:1
159:16 160:23
163:2 165:22
166:3,9,15,19,21
167:1 169:11
170:2 173:9 179:7
179:8 184:8 197:6
198:25 228:1,6,9
228:10
says 7:7 9:10,24
32:23 34:1 35:22
36:12 40:17 41:15
44:12 49:11 63:13
74:20 79:20 84:4
92:13 95:17 99:9
103:15 104:4,8,9
114:20 116:8,9
127:8 128:22
131:17 132:21
138:25 139:12
140:6 147:17
151:10 155:8,15
158:3 161:21
162:11 163:13
164:8 168:5,20
179:12 181:19
190:20
Sazonov 38:20
scarcely 199:13
scene 73:22 75:10
76:7,11 77:25
82:6,8 218:25
219:14,18,20
scenes 77:8
schedule 201:21
SCL1 18:9
scope 61:13,17
scores 84:10
Scott 78:9 95:17
screen-shot 128:14
scroll 99:13
search 74:21 75:16
77:5 82:6 91:2
180:17 182:16
207:8
searched 206:18
searches 40:22
133:2
searching 115:9
208:15
Seasons 102:4,23
second 5:9 10:21
15:12 54:8,22
55:14,23 57:16
74:23 84:6 86:5
104:18,20 107:20
125:9,12 126:16
126:23 127:3,7,23
150:20 151:6,12
151:13,16 155:15
174:5 175:17,23
176:5 192:22
218:21 227:4
seconded 40:21
secrecy 12:23
section 6:12 68:19
69:10 214:23
215:10
SECTU 18:16,22
19:10 32:7,19
40:18
secure 79:15 89:8
91:6 94:17 103:13
110:14
secured 90:14
security 19:18
78:10 89:23 90:2
94:1,12,23,23
110:25 167:9
201:2,13,16,23
202:5,7
see 6:15,19,21
10:17 11:25 12:5
12:7 14:11 15:6
16:4 18:8 22:7
23:8 24:8 25:22
27:10 28:8,10
31:22 34:1 37:21
40:4,9 46:11
47:11 51:14 53:4
53:9,15 54:5 56:3
58:6 62:10 65:9
66:18 74:3,10,23
75:1 78:24 79:18
84:7 91:17 98:6
99:7,10,13,23
Day 6  Inquest into the death of Alexander Perepilichny  13 June 2017

successful 31:4
succinct 212:21
sudden 119:18
210:3
Suffice 65:13
sufficient 62:13,15 68:17 141:22
116:3 120:6 128:21 134:8 136:5 150:1
154:11,20 158:16 158:18 159:14
185:17 186:4 190:19 192:16
212:2 228:16
suggested 25:16
68:5 107:17 137:9
141:3 176:14,16 197:13 208:7
suggesting 14:4,5
112:14 117:4 128:19 140:3
158:23,24 159:4
163:7 164:15
165:15 170:2
184:12,15,16
226:11
suggestion 4:12
150:12 159:12
174:18 196:1
203:11 227:25
suggestions 59:7
suggests 103:12
168:16,23 169:14
171:9 172:11
Suisse 42:23,24
43:1,6
Suite 53:9
sum 43:20,21 44:7
58:2
summarise 85:5
summarising 74:10
summary 60:1
166:23 170:18
191:9 212:21
218:7
summer 171:11
sums 42:25
Superintendent 1:3
203:16,18 213:16
214:12
supervisor 14:20
15:2
supplied 28:12
205:3
supply 205:2
supplying 26:17
205:20
support 90:16
109:13,17 110:12
111:7 143:15
171:19,23 211:21
suppose 55:5 65:10
158:6
sure 41:8 59:22
79:4 81:2 82:5
87:11 103:2
126:11,15 133:16
145:4 146:10
170:16 180:13
184:25 191:2,14
231:7,11
surely 47:13 130:15
160:12
surname 196:18
206:17,19
Suzanne 17:25
SVO 178:22
swap 79:6,21
Swiss 30:2 32:16
33:4 44:3,3 70:15
71:13 140:11,18
140:20,25 141:12
141:17,18,20,22
142:13 143:18
145:6,8 146:4,13
146:17,22,23
10:23 14:20 21:10
31:24 32:8,9
34:13 40:19 51:4
55:7 84:22 85:2
86:6 87:2,5,9,22
90:12 91:8 92:6
109:11 119:1
125:22 154:20
158:17 159:19
160:13 180:10
188:11,14 191:7
217:20 218:12
219:7 230:11
surrounding 22:21
24:10
surveillance 19:15
suspect 39:16
138:25 139:1,12
140:6 148:25
187:7 222:17
suspected 103:17
138:13 139:3,6
suspects 31:9 36:9
suspicion 73:8
138:22 200:14
suspicious 4:8
58:18 75:11 76:12
76:16,17 77:25
81:6 84:14 103:22
191:21 193:21
195:11
Sussex 32:9
Suter 78:21 112:25
127:6 152:24
Suzanne 17:25
Switzerland 72:7
131:2,20 140:9
143:24 147:17,19
sworn 217:13
232:13
symptoms 119:11
119:20
system 12:2 27:9
42:12 49:16 91:2
92:18 93:11,21
166:5 213:25
218:13 220:21,22
221:10
systems 79:14

T

TABLE

tab 6:14,17 214:13
218:1,2 220:8
tabbed 6:15
table 112:24
tables 18:3
take 3:21 5:2,16,20
5:21 8:8 25:23
27:2,17,21 28:2,6
30:10 39:4 57:15
57:20 71:22 83:8
88:6 102:5 117:7
121:9 124:21
129:15 145:12
148:1 152:19
173:10 183:6,15
190:13 207:18,25
214:10 218:17
220:9 226:24
taken 5:12 6:2 11:2
12:17 17:7 29:4
39:12,14 43:9
45:5 68:24 76:20
77:9 122:19
124:10 126:4
172:10 174:15,23
193:9,11,25
195:24 196:14

DTI  www.DTIGlobal.com  8th Floor, 165 Fleet Street
(+44) 207 4041400  London EC4A 2DY