

<p>1 Tuesday, 13 June 2017</p> <p>2 (10.15 am)</p> <p>3 MR SKELTON: Superintendent Pollard continues his evidence.</p> <p>4 THE CORONER: Yes.</p> <p>5 Housekeeping</p> <p>6 MR MOXON BROWNE: Sir, before Mr Pollard does that, can</p> <p>7 I just quickly raise a couple of matters that may assist</p> <p>8 you.</p> <p>9 THE CORONER: Yes.</p> <p>10 MR MOXON BROWNE: First of all, having considered the matter</p> <p>11 over the weekend my clients are now in a position to</p> <p>12 agree that Dr Panfilova's evidence about the correct</p> <p>13 translation of the contested message was correct. It</p> <p>14 was I think evidence that you elicited about the</p> <p>15 importance of the word that came before "krysha" that</p> <p>16 helped us to that understanding.</p> <p>17 I would also like to say that had it not been for</p> <p>18 the extraordinary quality of the transcription of that</p> <p>19 part of the evidence it would have been difficult for us</p> <p>20 to reach that agreement. It was obviously a very</p> <p>21 difficult passage and the transcript was extremely</p> <p>22 helpful to us.</p> <p>23 The other short point is that in relation to</p> <p>24 Mr Pollard's evidence, as you know, he has been</p> <p>25 referring to a bundle which I think is called bundle 9,</p> <p style="text-align: center;">Page 1</p>	<p>1 29 November. I think it is right that really nothing</p> <p>2 much happened between the 17th and 29th and no</p> <p>3 meaningful investigations were made?</p> <p>4 A. That is correct, in relation to the response to those</p> <p>5 letters there was a delayed -- there wasn't a response</p> <p>6 to those letters, that's correct.</p> <p>7 Q. Would you agree that we seem to have two -- I will not</p> <p>8 call them "delays" but two periods of days, one a period</p> <p>9 of about a week before the information starts to come</p> <p>10 in, first from Brown Rudnick, then from Mr Gherson and</p> <p>11 then from a firm of solicitors called Peters & Peters,</p> <p>12 but then there is a further week or more until the</p> <p>13 investigation that you headed started to get underway?</p> <p>14 A. That's correct, sir. And I think my involvement on</p> <p>15 28 November resulted from a local MP contacting the</p> <p>16 Chief Constable of Surrey on 27 November, to inform the</p> <p>17 Chief Constable that there would be an article about the</p> <p>18 death and Surrey Police's response published on</p> <p>19 28 November.</p> <p>20 Q. That is very fair. I think you are telling us that the</p> <p>21 action that you were asked to take was prompted</p> <p>22 principally by the fact that a newspaper story was about</p> <p>23 to appear?</p> <p>24 A. It was prompted following Mr Raab, the MP, contacting</p> <p>25 Surrey Police, yes.</p> <p style="text-align: center;">Page 3</p>
<p>1 it has most of the documents in it, that he needs to</p> <p>2 look at.</p> <p>3 We have for convenience added --</p> <p>4 THE CORONER: Thank you very much, I heard there was</p> <p>5 a little clip.</p> <p>6 MR MOXON BROWNE: Now it simply runs on, in order to save</p> <p>7 dodging between bundles.</p> <p>8 THE CORONER: Thank you very much.</p> <p>9 DS IAN POLLARD (continued)</p> <p>10 THE CORONER: All right, Mr Pollard, you are still bound by</p> <p>11 the oath or affirmation you took last week to tell the</p> <p>12 truth. You understand that?</p> <p>13 A. Yes, sir.</p> <p>14 THE CORONER: Thank you.</p> <p>15 Questions from MR MOXON BROWNE</p> <p>16 MR MOXON BROWNE: Mr Pollard, I think that your evidence</p> <p>17 that until at any rate 17 November, that is a week after</p> <p>18 Mr Perepilichny died, you didn't know and nor did</p> <p>19 anybody in your force know anything about his potential</p> <p>20 connection with what we have called the Hermitage fraud?</p> <p>21 A. Well I didn't know until the 28th but from my personal</p> <p>22 involvement, but obviously the letter was sent in to</p> <p>23 Surrey Police dated 17 November.</p> <p>24 Q. Yes, well I was going to come to that. The major crime</p> <p>25 team, under your command, took over either on 28 or</p> <p style="text-align: center;">Page 2</p>	<p>1 Q. Of course -- it is nobody's fault but the result of that</p> <p>2 was that when the autopsy, the post mortem, was carried</p> <p>3 out on 14 November, nobody knew, nobody relevant knew,</p> <p>4 that Mr Perepilichny might have been a candidate for</p> <p>5 an unlawful killing?</p> <p>6 A. Well the decisions made on the night were based on the</p> <p>7 information that the officers had on the night, did not</p> <p>8 deem the death to be suspicious and so in those</p> <p>9 circumstances it was referred to the coroner for a local</p> <p>10 post mortem, which took place on 14 November. So in</p> <p>11 those circumstances, and the information the officers</p> <p>12 had at the time, there was no suggestion or information</p> <p>13 about Mr Perepilichny's status as was then subsequently</p> <p>14 reported in the letters from Brown Rudnick dated</p> <p>15 17 November.</p> <p>16 Q. Dr Ratcliffe has subsequently said in response to</p> <p>17 questions from the senior coroner for Surrey,</p> <p>18 Mr Travers, that had he known on the 14th what he</p> <p>19 discovered a few days later, that he would have referred</p> <p>20 the business of the autopsy to a Home Office</p> <p>21 pathologist, someone like Dr Fegan-Earl?</p> <p>22 A. That's correct, in those circumstances if information is</p> <p>23 brought to the attention of a local pathologist and they</p> <p>24 have concerns then they automatically refer that back to</p> <p>25 the coroner who would then contact the police to have</p> <p style="text-align: center;">Page 4</p>

<p>1 a discussion and then a forensic pathologist or post 2 mortem would take place. That is correct. 3 Q. And of course that first autopsy was carried out in what 4 I might call standard fashion, whether or not it is 5 standard practice, the fact is that substantially all of 6 the contents of Mr Perepilichny's stomach were disposed 7 of? 8 A. That would appear to be the case. There was I think 9 limited stomach contents recovered from the second post 10 mortem on 30 November, but in the main that is correct. 11 Q. Of course it is also right that although some standard 12 samples of blood and urine were taken at the first 13 autopsy, it was in no way an autopsy of the kind that 14 Dr Fegan-Earl subsequently and, if I may say so, 15 belatedly carried out. 16 A. Well, we could only or the pathologist could only take 17 the samples that were available. We used obviously the 18 samples, the blood and urine from the first post mortem 19 but clearly on the forensic post mortem we took the 20 samples that we needed to take or that the pathologist 21 felt he needed to take in order to assist our subsequent 22 investigations in that matter. 23 Q. I think one of your first actions when you took over the 24 investigation on behalf of the major crime team was to 25 set up or cause to be set up what is called a gold group</p> <p style="text-align: center;">Page 5</p>	<p>1 I document this is to obviously to set out the structure 2 that is in place and the fact that there is in existence 3 a gold group as part of this inquiry, so for no other 4 reason but to document the fact there is a gold group. 5 Q. No, I had misunderstood whether or not you had been 6 involved but thank you for explaining that. 7 Then it says that the justification for the policy 8 is that the structures necessary to ensure 9 accountability et cetera: 10 "Gold structure necessary for all strategic matters 11 both political and reputational for Surrey Police." 12 Did you know what the political concern was, is that 13 kind of local politics to do with the police or is it 14 national politics or is it international politics? 15 A. Well it was a combination of both really, I think the 16 fact that there was a local MP wrote in, I think that 17 obviously it attracted attention nationally given the 18 concerns raised. So I think that equally applies to the 19 local politics, as well as the national position. So 20 that is my understanding of that, and interpretation of 21 that, and the strategic matters that then fall out of 22 that, along with the reputational issues potentially for 23 Surrey Police. 24 Q. And reputational? 25 A. Well, yes, reputational in terms of the criticism around</p> <p style="text-align: center;">Page 7</p>
<p>1 structure. 2 A. That is not my decision, that was a decision taken by 3 the assistant chief constable representing Surrey, and 4 they felt it necessary to set up a gold group given the 5 concerns that had been raised and the response of Surrey 6 Police at the time. That is why that gold group was set 7 up; it wasn't at my instigation. 8 Q. The reason why I thought it might have been your 9 decision was because you have a policy dealing with that 10 in your policy book. I wonder if you would just look at 11 page 68 of the bundle of documents. 12 A. Which section is it, please? 13 Q. 68. 14 A. Yes, but at which tab? 15 Q. Well my bundle isn't actually tabbed. You will see 16 numbers at the bottom right-hand corner in red, the work 17 I think of Mr Cohen probably. Tab 2, I am told. 18 A. That's correct, yes, I've got it now. 19 Q. This policy, we can see from the preceding page, 20 page 67, was adopted on 29 November, so very shortly -- 21 at the outset really of your taking command. And we see 22 who is going to be involved. Finishing "Gold -- 23 ACC Pinkney", that is the assistant commissioner, 24 Ms Olivia Pinkney. 25 A. Well it is assistant chief constable and the reason</p> <p style="text-align: center;">Page 6</p>	<p>1 the response or lack of response as was perceived from 2 the letters that were written in by Brown Rudnick, so 3 clearly potentially some reputational issues for Surrey 4 Police. 5 Q. Are you saying that it was a failure to appreciate who 6 Mr Perepilichny was prior to receiving those letters 7 that was causing adverse comment or are you saying it 8 was a failure to take action after the letters were 9 received? 10 MR SKELTON: Sir, sorry to intervene. The word "failure" 11 denotes some form of civil liability or is analogous to 12 civil liability. This is not an investigation into 13 Mr Pollard's investigation with a view to fault finding 14 in respect of it. And I think Mr Moxon Browne knows 15 that, as has been acknowledged at the previous PIR. 16 MR MOXON BROWNE: Yes, I certainly do and I am sorry if 17 I trespassed in the form of my questions. 18 Simply your last answer was not clear to me whether 19 you were saying that there was adverse criticism you 20 spoke of in relation to delay before those letters were 21 received or whether it was in relation to delay after 22 the letters were received or perhaps both? 23 A. My understanding and interpretation of that is that the 24 criticism was not about on the night but it was about 25 the criticism of failing to respond to the letters that</p> <p style="text-align: center;">Page 8</p>

<p>1 had been sent in to Surrey Police. 2 Q. Thank you. That clarifies that. 3 Just while we are on the subject of the gold group, 4 and then we can leave that, would you look please at 5 page 371 of your bundle. 6 This sets out the gold group's terms of reference 7 and certainly in the form I have, it précises the 8 minutes for that first meeting. 9 Item number 2, the terms of reference of the group, 10 says: 11 "To ensure Surrey Police retains the confidence of 12 the wider public and stakeholders through a thorough 13 investigation which not only proves or disproves the 14 cause and circumstances of the death but reduces the 15 likelihood of conspiracy theories in the future." 16 Do you know whose wording that was? Are you able to 17 tell me? 18 A. Well that would have been the assistant chief 19 constable's terms of reference for that meeting. 20 Q. Was there a feeling -- it is not minuted but was there 21 a feeling in the gold group that all of the need for 22 this inquiry was the product of a conspiracy theory? 23 A. No, the sentiment of that term of reference is about, as 24 it says, retaining the confidence of the public, 25 ensuring a thorough investigation is conducted, that not</p> <p style="text-align: center;">Page 9</p>	<p>1 both you and the previous coroner, as to public interest 2 immunity matters and so some care needs to be taken in 3 the answer to this question. 4 It may just be that he should be referred to the 5 document in question. 6 MR MOXON BROWNE: I am not aware that anything to do with 7 special branch has been the subject of a PII 8 application, let alone a ruling but then I am not privy 9 to -- not by any means privy to what that involves. 10 There is a document, but I was wondering whether 11 Mr Pollard could help us without looking at the 12 document? 13 A. I think the referral, it is documented on the electronic 14 investigation file of DC Burden and I think the referral 15 was made but there was some delay in response as to when 16 that result would be given to the officer, so I think 17 that is what that means, is the speediness of the 18 response from special branch, is my interpretation of 19 that. 20 Q. Let's have a look at page 366, as I think Ms Barton 21 wanted me to do. 22 This is a report from Detective Sergeant King, who 23 I think works in special branch, is that right? 24 A. That's correct. 25 Q. You will see about halfway down the page, "Local NSBIS",</p> <p style="text-align: center;">Page 11</p>
<p>1 only proves or disproves the cause of death and in doing 2 so reduces the likelihood of conspiracy theories in the 3 future. 4 THE CORONER: Anyone can get caught up in a conspiracy 5 theory, can't they, I mean the police can get caught up 6 in one as far as the investigation is concerned -- 7 A. Exactly, it is about sticking to the facts following the 8 evidence and then reducing conspiracy theories being 9 perpetuated in the media that may cause public alarm or 10 anxiety. 11 THE CORONER: Wherever they come from and whoever is the 12 subject of them? 13 A. Indeed. 14 THE CORONER: Yes. 15 MR MOXON BROWNE: That is helpful, thank you. Then before 16 we leave these minutes, if we just go for 372, where 17 I think we see the assistant chief constable saying: 18 "Organisational learning, there are three areas 19 where it appears the opportunity was missed to raise 20 this death as a concern or issue to senior management." 21 The second of those is "referral to special branch". 22 What information did special branch hold that might 23 have alerted Surrey Police? 24 MS BARTON: Sir, Mr Moxon Browne knows what information is 25 held. The matter has been the subject of a ruling by</p> <p style="text-align: center;">Page 10</p>	<p>1 which I think stands for National Special Branch 2 Information System, or something like that, it is 3 a database? 4 A. That's correct, it is a database, yes. 5 Q. Then we see that there was information about both Mr and 6 Mrs Perepilichnaya apparently on that database. If you 7 go over the page, that is page 367, you will see that 8 there is information there "Tier 1 investors" and there 9 is the name of two companies and then quite a lot of 10 further material has been redacted. 11 Here it is possible that we may be getting into what 12 I would refer to as Dame Heather Hallett territory and 13 indeed the danger of asking questions upon false 14 assumptions, because you of course are privy to what 15 lies beneath the redactions and so I am very much 16 wishing to be guided by you but my question would be, if 17 you think it is a proper question. Taken together with 18 the gold group's concern that special branch might have 19 been consulted earlier than they were with the inference 20 that they held information that might have been useful, 21 coupled with fairly substantial redactions which as 22 I understand it are made on the basis of some national 23 secrecy interest -- 24 MS BARTON: Sir -- 25 MR SKELTON: Sorry to clarify again, I think this should be</p> <p style="text-align: center;">Page 12</p>

<p>1 well known in this case, these documents were not the 2 subject of a PII application before the court. They 3 were redacted on the grounds of relevance. 4 THE CORONER: Relevant, right. 5 MR MOXON BROWNE: Relevance, right. 6 MR SKELTON: The material that has been redacted is 7 irrelevant. 8 THE CORONER: That was my recollection. 9 MR MOXON BROWNE: If it is irrelevant, obviously the coroner 10 has seen the material as I have not, I will move on. 11 But I think the answer came back to Detective 12 Constable Burden that there was no adverse trace -- not 13 no trace but no adverse trace. Can you confirm that? 14 A. That is what is recorded on the electronic investigation 15 log, that's correct. 16 Q. Yes. 17 Can we move then, please, to the lines of inquiry 18 that you identified at the outset of your investigation. 19 I think you can agree, perhaps without looking at your 20 personal notebook or indeed the policy book, that from 21 the word go intelligence on the Klyuev organised crime 22 group was your number one line of inquiry? 23 A. That wasn't the only one. There was a list under the 24 line of inquiry for intelligence that included the 25 so-called Klyuev organised crime group, it included</p> <p style="text-align: center;">Page 13</p>	<p>1 experienced in a case with this sort of background? 2 A. Well I -- I mean he was an intelligence supervisor, so, 3 yes. 4 Q. Well let's just have a look at what he noted from that 5 meeting. If you look, please, at page 333 of the 6 bundle, you will see that this document on page 333 is 7 headed D316 which is a HOLMES reference and it is that 8 which tells us that this is the PNB of Mr Banner. He 9 gives the date, 29 November 2012. We know from other 10 evidence that you held a substantial briefing meeting on 11 that day with many attendees. 12 One sees from the second paragraph, and this is 13 I think a briefing that has been given by you as to the 14 factual background: 15 "On 10 November 2012, left home address [this is 16 Mr Perepilichnyy] went for a run 4.30, overweight, drank 17 and smoked heavily." 18 From where had you obtained that information? 19 A. There was, at the start, some confusion as to certain 20 facts around Mr Perepilichnyy's health. So I think that 21 came from the earlier investigation, but that was 22 something to be clarified and indeed was clarified later 23 on because clearly he wasn't overweight, he didn't drink 24 and he gave up smoking 13 years ago. So often at the 25 start of an inquiry you get a lot of information and you</p> <p style="text-align: center;">Page 15</p>
<p>1 Mr Perepilichnyy, Mrs Perepilichnaya, Brown Rudnick, 2 Hermitage, so it included a number of different people 3 and companies, not just Mr Klyuev or -- 4 Q. I was not suggesting it was your own line of inquiry, 5 I was suggesting, certainly in your PNB it is listed as 6 number 1 and in the policy notebook it is certainly 7 given some prominence as a line of inquiry? 8 A. Not really, there is no rationale for where it features 9 as number 1, number 2 or number 10, I mean it just 10 features as a line of inquiry. 11 Q. I see. 12 Sir, for your note, the relevant policies are set 13 out at pages 69 and 70 of this bundle. And the PNB 14 reference is 69 and 70. 15 I think a gentleman called Mr Banner attended your 16 initial briefing on 29 November? 17 A. Sorry? 18 Q. Mr Banner, Mr Gareth Banner? 19 A. Yes. 20 Q. He is an intelligence supervisor with Surrey Police? 21 A. That's correct. 22 Q. He's a senior man and ex-MoD, I think, Ministry of 23 Defence intelligence? 24 A. Yes, I believe he was in the military. 25 Q. Someone whose views you, I presume, respected as</p> <p style="text-align: center;">Page 14</p>	<p>1 have to check that information for accuracy, which is 2 what was later done. 3 Q. If you go forward, please, in his notes to page 337, and 4 you will see: 5 "Intelligence, victim, family associates ..." 6 Then "OCG", which stands for "organised crime 7 group", and then in brackets "KOCG", which stands for 8 "Klyuev organised crime group": 9 "... times of entries to UK or are they resident?" 10 So either you are saying or Mr Banner is saying, or 11 at any rate Mr Banner is thinking, that it would be 12 sensible to discover who of the identified members of 13 the KOCG was in the UK at the relevant time? 14 A. Well they are his notes, but, you know, I can't speak 15 for his notes but that is what is there, so. 16 Q. That is perfectly fair but it must have occurred to you, 17 I suggest, it was something you wanted to do was to find 18 out whether any of what I might call, very loosely, 19 "candidates" was in the UK at the relevant time? 20 A. Inquiries were made by a DC Evans around the organised 21 crime group and the Klyuev and there was no information 22 about them, which is recorded in my concluding report. 23 Q. You say that inquiries were made by someone called 24 Police Constable Evans? 25 A. That's correct. The only reference to -- in his report,</p> <p style="text-align: center;">Page 16</p>

<p>1 the only reference to the Klyuev organised crime group</p> <p>2 was that which was found on a website called Russian</p> <p>3 Untouchables.</p> <p>4 Q. That is Hermitage's website, isn't it?</p> <p>5 A. As I understand it, yes, it is Hermitage's website.</p> <p>6 Q. That gave you the names, quite a lot of detail and there</p> <p>7 is a lot of documentation showing you have taken all</p> <p>8 that on board. What I am asking is who was responsible</p> <p>9 for pursuing the inquiry that Mr Banner has identified,</p> <p>10 that is to say, who of these people was in the UK at the</p> <p>11 relevant time, which is an obvious inquiry to make?</p> <p>12 A. Well those inquiries were conducted by DC Evans, he</p> <p>13 submitted a report and his report was that, and bear in</p> <p>14 mind he had made inquiries with as was then SOCA and</p> <p>15 SOCA International and those reports were negative in</p> <p>16 terms of any acknowledgement or attribution to the</p> <p>17 Klyuev organised crime group. And that is contained in</p> <p>18 his report.</p> <p>19 Q. You say he went to SOCA to find out this information?</p> <p>20 A. Yes, it is set out clearly in his report.</p> <p>21 Q. Yes, would you look at page 342 of the bundle in front</p> <p>22 of you, which is a report from -- sorry, I have the</p> <p>23 wrong reference.</p> <p>24 347 I should have said. This is a witness statement</p> <p>25 from Suzanne Leadbetter, she is an analyst I think</p> <p style="text-align: center;">Page 17</p>	<p>1 Q. Yes. Can you explain -- sorry, you said the name of the</p> <p>2 unit that actually has the data. Could you just say</p> <p>3 that again?</p> <p>4 A. It is the South-East Counter Terrorism Unit.</p> <p>5 Q. Not that one, the one that holds the data?</p> <p>6 A. It is the National Borders Targeting Centre.</p> <p>7 Q. I will call them "National Borders" for the moment.</p> <p>8 A. National Borders.</p> <p>9 Q. Can you just help me with this, plainly National Borders</p> <p>10 was able to provide SECTU, who in turn provided</p> <p>11 Ms Leadbetter, with extremely detailed information about</p> <p>12 what airports Mr Perepilichnyy had flown from both in</p> <p>13 the UK and abroad.</p> <p>14 Is that something which everybody who travels is --</p> <p>15 that type of ... "surveillance" is the wrong word but</p> <p>16 that type of gathering of information, does that apply</p> <p>17 to everybody or just people who are of interest to the</p> <p>18 security services or just to Russians or what?</p> <p>19 A. It applies to everybody, so no different, you know, if</p> <p>20 you go online you leave a trace, if you book on with</p> <p>21 Amazon there is always a -- there is a correlation,</p> <p>22 there is always a movement of your transactions. It is</p> <p>23 no different to that, it just records everybody's travel</p> <p>24 in and out of the UK. So there is no -- nothing unique</p> <p>25 to that, it is not unique to certain individuals and it</p> <p style="text-align: center;">Page 19</p>
<p>1 working with the major crime team?</p> <p>2 A. Correct.</p> <p>3 Q. She produced some very valuable tables compressing a lot</p> <p>4 of information, showing what Mr Perepilichnyy had been</p> <p>5 spending money on, where he had been and the flights he</p> <p>6 had been taking.</p> <p>7 A. Yes, that's correct.</p> <p>8 Q. We see under the bold letters about two-thirds of the</p> <p>9 way down, "SCL1, report to show phone usage". Then</p> <p>10 below that:</p> <p>11 "On 5 July 2013 I compiled a chart to show the last</p> <p>12 six months of travel made by Alexander Perepilichnyy</p> <p>13 using information provided to the investigation by the</p> <p>14 South-East Counter Terrorism Unit. This was later</p> <p>15 annotated."</p> <p>16 So she went to SECTU to get this information</p> <p>17 apparently?</p> <p>18 A. Yes, well there is what is called the National Borders</p> <p>19 Targeting Centre. It records details of people's travel</p> <p>20 in and out. It can be applied for by any person working</p> <p>21 within the police or law enforcement. It just so</p> <p>22 happened this particular request was made of SECTU,</p> <p>23 nothing other than that really, it is a straightforward</p> <p>24 request for information and that unit was the unit that</p> <p>25 applied for it.</p> <p style="text-align: center;">Page 18</p>	<p>1 is certainly not unique to any particular law</p> <p>2 enforcement. It just holds data of travel.</p> <p>3 Q. That is helpful, I was wondering about that.</p> <p>4 Is it fair to say that if you could obtain that very</p> <p>5 detailed information about Mr Perepilichnyy, so you</p> <p>6 could also have obtained similar information about other</p> <p>7 named individuals if it is that easy to do?</p> <p>8 A. Well, the request for information is a proportionate</p> <p>9 request and in those circumstances it was proportionate</p> <p>10 to make that request for Mr Perepilichnyy to establish</p> <p>11 his movements but on the basis that DC Evans's report</p> <p>12 did not identify or attribute the existence of the</p> <p>13 Klyuev, then I wasn't at that point of the inquiry</p> <p>14 prepared to then track everyone else's movements just</p> <p>15 because they happened to be mentioned on a website</p> <p>16 called Russian Untouchables.</p> <p>17 Q. Basically you thought that the information you were</p> <p>18 being provided about who might be in the frame, if I can</p> <p>19 use that expression, was not reliable, and it was not</p> <p>20 a matter you were interested in pursuing?</p> <p>21 A. No, no, that is not -- what I said on Friday was it is</p> <p>22 about proportionality and identifying relevant lines of</p> <p>23 inquiry. So if the circumstances had been completely</p> <p>24 different and if the circumstances had identified</p> <p>25 evidence of murder, then I would have reviewed my lines</p> <p style="text-align: center;">Page 20</p>

<p>1 of inquiry. And if those lines of inquiry were to 2 indicate the involvement of people from foreign 3 countries then that would have been a further relevant 4 line of inquiry to pursue to establish whether they 5 travelled to the United Kingdom. So it is based on 6 those facts when -- you know, that I would have reviewed 7 those circumstances. 8 Q. Yes. 9 We were informed, and I say we, the coroner, the 10 senior coroner for Surrey and interested persons, were 11 informed I think in the middle of last year, 2016, that 12 someone called Andrei Pavlov, who had been identified by 13 Hermitage as a member of the KOCG, left the UK on 14 11 November 2012, that is to say the day after 15 Mr Perepilichny's death. 16 When did you first become aware of that information? 17 A. I think that was one of those PIRs. 18 Q. So the fact that he left the UK the day after the death 19 and I think there is no information as to when he 20 arrived, was not something that was in front of you at 21 all when you were carrying out your investigation? 22 A. No. 23 Q. Nor indeed like information in relation to any other 24 people who had been identified by Hermitage? 25 A. Sorry, I didn't hear?</p> <p style="text-align: center;">Page 21</p>	<p>1 Mr Pollard, you are the SIO? 2 A. Yes, my page 87 is not what you are referring to, so ... 3 perhaps if someone can direct me to -- 4 THE CORONER: What is the first bit on your page 87? Does 5 it have "Policy number 29"? 6 A. Yes, it does, yes. 7 THE CORONER: Then if you go down -- 8 A. I see the ... okay, I've got it, yes, thank you. 9 THE CORONER: In fact you need to go to policy number 30, 10 I think, do you have that? 11 A. Yes, I've got it, thank you. 12 MR MOXON BROWNE: Then I am going over the page: 13 "The justification is raised by SIO ..." 14 I was just identifying that that is you, the senior 15 investigating officer? 16 A. Yes. 17 Q. "... and discussed at the gold group meeting held on 18 10 December. In relation to Hermitage those allegations 19 and circumstances are already known to SOCA and have 20 been since 2007. SOCA's position remains that the 21 crimes were carried out in Russia and outside the UK, so 22 we have no power to investigate." 23 Then (2): 24 "The potential threat to the United Kingdom from 25 Russian organised crime groups is something SOCA are</p> <p style="text-align: center;">Page 23</p>
<p>1 Q. You didn't have that information about Mr Pavlov and nor 2 did you have it about anybody else who Hermitage had 3 identified as a member of the KOCG? 4 A. No. 5 Q. Thank you. 6 I would like you, please, to look at your policy 7 number 30, which we will see at page 87 of the bundle. 8 This is dated 10 December 2012, so it is at 9 a comparatively early stage of your investigation. We 10 have seen the evidence that you had identified the need 11 to look at the OCG and particularly KOCG on 12 28/29 November, but two weeks later you are saying: 13 "This inquiry will not be investigating any aspects 14 around the fraud and money laundering inquiry in Russia 15 against Hermitage Capital. Inquiries undertaken to date 16 have brought to the fore the level of international 17 organised crime and potential threat to the UK from 18 Russian organised crime groups. However 19 Operation Daphne will not incorporate that aspect into 20 their inquiry because it is focused on establishing the 21 circumstances surrounding the death of 22 Alexander Perepilichny." 23 And then the justification for the policy is that 24 this had been raised by SIO, that is the senior 25 investigating officer. That is you isn't it,</p> <p style="text-align: center;">Page 22</p>	<p>1 sighted on at this moment in time. There is no 2 expectation that this investigation will be required to 3 investigate these OCGs." 4 Is the position that either SOCA or the gold group 5 were effectively telling you to back off this particular 6 aspect of your inquiry? 7 A. No, not at all. The reason I raised that was because 8 when my officers went to see the three representatives 9 for Hermitage on 6 December, they reported back 10 obviously the circumstances surrounding the Hermitage 11 case, the Magnitsky Act and also the implications of, or 12 potential implications, the Magnitsky Act and its 13 implications for organised crime generally. 14 So, having been informed of that information by my 15 officers, it was right and proper that I raised that at 16 the gold group and reference to SOCA, SOCA were aware of 17 Hermitage's fraud investigation because they had been 18 written to and asked to investigate, along with the City 19 of London Police, the director general, the Serious 20 Fraud Office with whom Hermitage asked to investigate 21 their fraud in Russia and, as SOCA rightly said, they 22 have no jurisdiction to investigate crimes in foreign 23 countries, and Hermitage were told that. 24 So it is, and quite clearly as with any other level 25 of criminality or organised crime, sometimes there is</p> <p style="text-align: center;">Page 24</p>

<p>1 a risk to the United Kingdom, be that from another</p> <p>2 country or another -- so yes, they are of course sighted</p> <p>3 on organised crime which includes Russia. Which is why</p> <p>4 that comment is made there.</p> <p>5 From my perspective, my focus was to investigate, as</p> <p>6 my three aims were, the cause of death, the</p> <p>7 circumstances of the death and pursue any criminally</p> <p>8 related offences, with the two working hypotheses</p> <p>9 I identified and not to, on this occasion, until I am</p> <p>10 informed of the circumstances of the death, go off at</p> <p>11 a tangent and investigate Russian organised crime. That</p> <p>12 was the context of that policy entry, not because I was</p> <p>13 warned off or told not to pursue it.</p> <p>14 Q. What I am really trying to get at is what caused this</p> <p>15 change of direction because you had originally</p> <p>16 identified that this was, I suggested, number one on</p> <p>17 your list. You say well the list was a long list but</p> <p>18 anyway it was definitely on your list and then it went</p> <p>19 off your list and I was wondering what had happened in</p> <p>20 that short period of --</p> <p>21 A. It didn't go off my list but as I say you identify lines</p> <p>22 of inquiry to see what information comes back and you</p> <p>23 have to take all of that information in the whole round.</p> <p>24 So I was still waiting for the results of the</p> <p>25 toxicology, so, you know, it is not a case of stopping</p> <p style="text-align: center;">Page 25</p>	<p>1 Q. You translated that policy into action, or at least</p> <p>2 a declining to take action in a number of important</p> <p>3 respects. Perhaps we could look at the situation with</p> <p>4 regard to talking to Mr Browder at page 348 of the</p> <p>5 bundle.</p> <p>6 This is called an action record print. I think the</p> <p>7 word "action" in this context is a term of art, it is</p> <p>8 a formal word that you make lists of actions, things</p> <p>9 that you think need to be done. Then you have a system</p> <p>10 for following through to see whether those actions have</p> <p>11 been done or whether it is necessary to pursue them. Is</p> <p>12 that roughly how it works?</p> <p>13 A. So yes, the action is to carry out a task and then they</p> <p>14 get reviewed as to whether they remain relevant or not</p> <p>15 and in this case it was referred on the basis that they</p> <p>16 had no information to provide my officers and for that</p> <p>17 reason there was no requirement to take a statement from</p> <p>18 Mr Browder.</p> <p>19 Q. Yes, I mean the action that was originally recorded as</p> <p>20 something that ought to be done was:</p> <p>21 "TST [take statement] Bill Browder, CEO of</p> <p>22 Hermitage."</p> <p>23 That was the task, and then you say it is referred</p> <p>24 on 11 February 2013 and you say "It is no longer</p> <p>25 considered these actions are relevant"?</p> <p style="text-align: center;">Page 27</p>
<p>1 and starting, it is about we have made the inquiry,</p> <p>2 there was nothing about the Klyuev organised crime</p> <p>3 group, the only attribution to that was based on</p> <p>4 Hermitage, as was those members of those members of that</p> <p>5 alleged group was based on a website called Russian</p> <p>6 Untouchables, so it wasn't a case of stopping.</p> <p>7 Q. Mr Perepilichny was of course known to SOCA, wasn't he?</p> <p>8 A. No.</p> <p>9 Q. Well, they had, as the documents show, received I think</p> <p>10 on two occasions inquiries from Moscow police in I think</p> <p>11 2011 and 2012, have you not seen those documents?</p> <p>12 A. In terms of a request, it was a request for information</p> <p>13 about whether he owned any properties in the</p> <p>14 United Kingdom.</p> <p>15 Q. If they didn't know any more than that about</p> <p>16 Mr Perepilichny, do you agree with me that we have to</p> <p>17 assume that when Hermitage were supplying SOCA and</p> <p>18 indeed other law enforcement agencies with very, very</p> <p>19 detailed information about what had become -- or what</p> <p>20 was said to have become of the money flowing out of</p> <p>21 Russia after the fraud, that at no stage did SOCA ever</p> <p>22 have a quiet little word with Mr Browder, "Where did you</p> <p>23 get this information from?"</p> <p>24 A. I can't speak for SOCA and I don't really know what</p> <p>25 Mr Moxon Browne is trying to say, frankly.</p> <p style="text-align: center;">Page 26</p>	<p>1 A. That's correct.</p> <p>2 Q. The fact is that you never did take the statement from</p> <p>3 Mr Browder?</p> <p>4 A. Didn't need to, because we had spoken to his three</p> <p>5 representatives and they had no direct evidence to</p> <p>6 provide my inquiry that would assist it or take it any</p> <p>7 further:</p> <p>8 Q. I see. Then the files that you had been provided with,</p> <p>9 or those that your officers had been provided with by</p> <p>10 those members of staff, a tiny fraction of which we see</p> <p>11 in the bundles but very, very detailed documentation was</p> <p>12 supplied. That was the subject of an action which was</p> <p>13 referred I think if we look at page 349, so you are</p> <p>14 given -- I think it was Detective Constable Pollard, no</p> <p>15 relation, was given the files.</p> <p>16 The intelligence manager, intelligence:</p> <p>17 "To review files Hermitage have provided and act in</p> <p>18 accordance with the aims of published SIR."</p> <p>19 A. Yes.</p> <p>20 Q. What is "SIR"?</p> <p>21 A. It stands for "strategic intelligence requirement".</p> <p>22 Q. Sorry, I didn't hear?</p> <p>23 A. It stands for strategic intelligence requirement.</p> <p>24 Q. Yes. That was something that was obviously to be done,</p> <p>25 to read those files that you had been given.</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 You say: 2 "The senior investigating officer's stated lines of 3 inquiry that ran alongside ..." 4 This is a decision taken on 11 March 2014, basically 5 saying you are not going to do it. 6 MS BARTON: Perhaps it would be helpful if he read the 7 middle paragraph of that as to the reason why it wasn't 8 going to be done, if this is being put. 9 MR MOXON BROWNE: Yes. We can read the whole thing, if 10 anybody wants to: 11 "The detailed toxicology tests have now been 12 completed and have not identified any cause for concern. 13 It appears that Alexander Perepilichnyy was not 14 administered any poisonous or noxious substance that 15 caused his death." 16 What I am interested in is the fact that it would 17 appear that these files were never read? 18 A. What the action -- they were not read but what I did ask 19 for, because of the size of the file, was I wanted 20 an actual timeline presented to me from Hermitage 21 setting out exactly what their interaction was with 22 Mr Perepilichnyy, which is what they then subsequently 23 provided on 18 December, which provided no content at 24 all of any direct evidence they had that 25 Mr Perepilichnyy had raised any cause for concern in</p> <p style="text-align: center;">Page 29</p>	<p>1 the first hurdle because the Crown Prosecution Service 2 would have asked me what offence I am investigating, and 3 in the absence of a cause of death or evidence of there 4 being murder, clearly I wouldn't have been successful in 5 that. 6 Furthermore, the actual -- had there been any 7 evidence, you then have to determine when that would 8 have happened, how and so forth before you can then 9 identify who your persons of interest, suspects or 10 witnesses may be, so until I am aware of that 11 information, that is why it would have added no value 12 whatsoever in sending officers to speak to Stepanov, 13 Pavlov or Kovtun because I was not able to determine 14 evidence of an offence of murder and therefore their 15 status in that inquiry was clearly unknown and would not 16 have added value at that time for those reasons. 17 Q. Yes, what I am really interested in is the rather 18 shorter point, not so much why you didn't pursue these 19 things but rather simply to confirm that you didn't. 20 A. I have explained the reasons why we didn't. 21 Q. Yes. 22 I would just like to see how this is dealt with in 23 your final Operation Daphne report to the coroner, 24 originally addressed to the senior coroner for Surrey. 25 The extract I want to look at, is in the bundle at</p> <p style="text-align: center;">Page 31</p>
<p>1 relation to his safety or the matters which he was 2 assisting the Swiss authorities with. 3 So this action is given low priority. It may well 4 have featured had the events turned out as they were 5 different but based on the timeline from Hermitage, 6 which was asked for, this was of low priority and that 7 is why it was referred later on because obviously the 8 detailed tests did not identify evidence of poison or 9 murder. 10 Q. I think it is right that actions to take statements from 11 Mr Pavlov, Mr Andrei Pavlov, who I mentioned a moment 12 ago, the person who left the UK on the day after 13 Mr Perepilichnyy's death, that was abandoned, and so 14 also was any inquiry into Mr Kovtun, a person wanted for 15 the murder of Mr Litvinenko? 16 A. As I explained in my evidence on Friday, sir, inquiries 17 overseas are only generated when certain legal 18 requirements are relevant in order for me to pursue 19 those. 20 So in the answer of there being any evidence that 21 Mr Perepilichnyy had been murdered, they were not deemed 22 by me to be viable lines of inquiry because when they 23 were referred, which I think was on 25 February 2013, 24 I was not prepared to send officers to Russia. As 25 I said in my evidence on Friday, I would have failed at</p> <p style="text-align: center;">Page 30</p>	<p>1 page 119. (Pause) 2 You say there, under the heading "Intelligence", 3 this is you reporting effectively to the coroner: 4 "Given the nature of the inquiry, the below agencies 5 were contacted and local intelligence checks undertaken 6 on all available information known about Alexander and 7 his family. SOCA [Serious Organised Crime Agency] SECTU 8 [South-East Counter Terrorism Unit], Surrey special 9 branch, Surrey and Sussex Police Information 10 Assistance." 11 Then you say: 12 "Intelligence research did not uncover any 13 information to suggest or indicate Alexander was at risk 14 of any harm, threat or retribution from any individuals 15 or that his death had anything to do with his status 16 connected with the Swiss money laundering 17 investigation." 18 Is the point you are making there that the people 19 that you consulted, that is to say SOCA, SECTU, special 20 branch and your database, haven't thrown up any data of 21 the kind you describe? Is that the point you are 22 making? 23 A. Well, it is what it says. So those were, you know, 24 extensive inquiries with those law enforcement and 25 intelligence agencies and as a result of that the</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

<p>1 intelligence research did not uncover any information to 2 suggest or indicate Mr Perepilichnyy was at risk of 3 harm, threat or retribution or that his death was 4 connected to his status in the Swiss inquiry. That is 5 what those inquiries led me to conclude. 6 Q. Then you go on to say, in fact I would suggest rather 7 remarkably: 8 "Equally there was no intelligence to show that 9 Alexander Perepilichnyy had any criminal links to 10 organised crime groups within the UK, Ukraine or 11 Russia." 12 That was the information you were leaving with the 13 coroner. 14 A. That is because that what the -- those inquiries 15 identified to me that there was no intelligence, that's 16 correct. 17 Q. Did you not think it would be helpful to the coroner to 18 know that your family liaison officers had reported in 19 some detail about evidence that they had elicited from 20 Mrs Perepilichnaya about threats and the perception of 21 threats, evidence we have already heard, or that the 22 information that you had been given, particularly from 23 Mr Browder and Hermitage, but apparently not pursued, 24 indicated that Mr Perepilichnyy was intimately involved 25 with the activities of an organised crime group?</p> <p style="text-align: center;">Page 33</p>	<p>1 paragraphs 10.2 and 10.3 of my concluding report contain 2 a gist of the information that I had obtained that could 3 properly be disclosed more widely with the intention of 4 giving an outline of the results of our research. 5 I consider them to be a fair and accurate gist." 6 Does that mean that there was another version of 7 this report which had rather more detail under 8 paragraphs 10.1 and 10.2? 9 A. No, sir. 10 Q. In what sense are you using the word "gist"? 11 A. Well because this sets out -- rather than detail every 12 single report or response, it sets out the gist of the 13 inquiries that I took with those agencies, it is as 14 straightforward as that. 15 Q. Can I turn please to Mr Kovtun, the man wanted for the 16 murder of Mr Litvinenko. I want you to look at 17 a newspaper story which appeared in the Daily Telegraph 18 in I think December 2012, we have it at page 363. 19 It is written by Mr Parfitt, who is the Telegraph's 20 Moscow's correspondent, and date of it was 21 5 December 2012, so it was quite early days. 22 It says: 23 "Public records show that a legal representative 24 acting for Mr Perepilichnyy told a court in Moscow in 25 2011 that the businessman was living outside the Russian</p> <p style="text-align: center;">Page 35</p>
<p>1 A. Well, I don't see where that information says that he 2 was intimately involved in an organised crime group. 3 Q. Is your position today that you don't think that 4 Mr Perepilichnyy was under any threat? 5 A. Yes, that is my position, yes. 6 Q. Is your position today that as far as you are concerned 7 he had no links with any organised crime group? 8 A. That's correct, that is my position, yes. 9 Q. That is where you are coming from? 10 A. That's correct. 11 Q. Can you turn particularly to Mr -- yes, just before we 12 leave that. I think you gave a statement last year to 13 the senior coroner for Surrey in relation to this part 14 of your report, in which you describe it as a "gist". 15 Mr Fear-Segal has very kindly given me a copy of the 16 statement. It is not in the bundle so I will read it 17 out: 18 "In the course of Operation Daphne I received 19 certain information that I knew could not be widely 20 disseminated. It is this type of information in respect 21 of which the chief constable now asserts public interest 22 immunity. However I was always aware of the need for HM 23 senior coroner and interested persons to receive 24 an account of the inquiries I had carried out and the 25 gist of the information I had received. For that reason</p> <p style="text-align: center;">Page 34</p>	<p>1 Federation because he feared for his life." 2 Then: 3 "Mr Perepilichnyy who mysteriously dropped dead at 4 the page of 44 when out for a jog was the defendant in a 5 series of lawsuit brought in Russia by Dzhirsa, a Moscow 6 based business consultancy. The founder and general 7 director of Dzhirsa is Dmitry Kovtun, who is thought to 8 be a former military intelligence officer and who the UK 9 Crown Prosecution Service suspects helping to spike 10 Mr Litvinenko's tea with polonium." 11 They managed to obtain an interview with Mr Kovtun 12 in Moscow, over the page at 364, where he says: 13 "I heard about Mr Perepilichnyy's death but I didn't 14 know him and I had no idea about these court proceedings 15 between him and Dzhirsa. I set up Dzhirsa on behalf of 16 some friends who asked me to be the general director 17 because I enjoy a certain reputation. They are former 18 officers who help resolve business disputes. People 19 call them 'the military men'. 20 Did you think that story, from an apparently well 21 respected journalist, might present you with a line of 22 inquiry? 23 A. As I explained before, my inquiry is based on evidence 24 and certainly with the inquiries I made with those law 25 enforcement intelligence agencies on graded intelligence</p> <p style="text-align: center;">Page 36</p>

<p>1 rather than newspaper reports. But I had, as part of 2 that, in any event identified an action and a potential 3 line of inquiry which is why the action was raised for 4 Mr Kovtun, but as I have explained earlier that was not 5 proceeded with because I still had no cause of death to 6 indicate that he had been murdered. 7 So that may well have been reviewed had there been 8 evidence that Mr Perepilichny had been murdered. 9 Q. Well, it sounds a little bit circular. You are not 10 going to look at evidence that might show that 11 Mr Perepilichny had been murdered until you are 12 satisfied he has been murdered; is that right? 13 A. Well I have to have evidence that someone has been 14 murdered in order for me to then identify what lines of 15 inquiry might lead me to those who are responsible for 16 that murder. So I have to have a cause of death, of 17 course. 18 Q. You told us on, I think, Friday that Detective Constable 19 Pollard, no relation, had for his own interest been 20 looking at some of the Skype messages and had done 21 a Google translation of one of them, which we see at 22 page 355 of this bundle, if you want to just look at it. 23 That is the information that he presented you with. 24 A. That's correct, yes. 25 Q. Did you think it might be worth pursuing the content of</p> <p style="text-align: center;">Page 37</p>	<p>1 proceedings against Mr Perepilichny, but that that was 2 all just based on a newspaper story? 3 A. Well -- 4 Q. Do you want to look at it? Will you take it from me or 5 would you want to look at it, look at it if you like? 6 A. I would rather look at my statement, please. 7 Q. Yes, paragraph 64. 8 Your statement, can we just get the date of it 9 because it is quite late on in the piece, it is 10 12 August 2016. You say: 11 "Hermitage included in this same report information 12 of some lawsuits that had been taken out in Russia 13 against Mr Perepilichny reported in the press. They 14 claimed that one such lawsuit has been taken out against 15 Mr Perepilichny by a company, the founder and general 16 director of which was allegedly Dmitry Kovtun, a suspect 17 on the murder. Again this information was based on 18 newspaper articles as opposed to any direct evidence 19 they had in their possession." 20 Of course by 2016 you knew perfectly well, didn't 21 you, the Skypes showed that this was no mere newspaper 22 story, there was quite a lot of evidence about it? 23 A. I wouldn't say there was a lot of evidence but this 24 relates to the fact that Hermitage themselves had no 25 direct evidence themselves, and they were simply</p> <p style="text-align: center;">Page 39</p>
<p>1 the Skype messages, both before and after that one that 2 almost by chance your namesake had discovered or did you 3 not attach any importance to it? 4 A. No, I didn't, because as I say it was in 2011, it is 5 clearly a legal matter, and for the reasons I have 6 explained previously, certainly in the immediacy and the 7 two weeks leading up to his death over a year later from 8 this, there was nothing in any correspondence that led 9 me to believe that he had received any threats or feared 10 for his safety. 11 Q. Am I right to understand from the evidence you gave on 12 Friday that in fact the only Skypes you looked at were 13 those relating to a two-week window around the death? 14 A. Yes, as I set out in my timeline, they were the 15 parameters but I think in fact certainly in relation to 16 the Skype messages, which is part of D197, the documents 17 within HOLMES, there are some previous dates in there 18 that precede my timeline. And as I understand, that is 19 because there wasn't a lot of Skype messages, so 20 Mr Sazonov -- I think is the correct pronunciation of 21 his name -- did go back a little further but found no 22 relevant Skype messages. 23 Q. I think in your witness statement, for the coroner's 24 note it is paragraph 64, you say that you were told by 25 Hermitage that Mr Kovtun was involved in legal</p> <p style="text-align: center;">Page 38</p>	<p>1 referring to newspaper articles. That is what that 2 means. 3 Q. I accept that, Mr Pollard, but this is information you 4 are giving to the coroner and you didn't see fit to add, 5 "But of course since then I have ascertained that this 6 is reality, not just a newspaper story"? 7 A. Well, I didn't no, because as I say that is my 8 explanation in that paragraph, it is about Hermitage. 9 Q. I see. 10 Can we now stray for a moment outside the bundle you 11 have, into bundle 2, because there is a document that 12 I had neglected to extract, which you can help us with. 13 It is at 623. 14 This is a report by Ekaterina Clark-O'Connell, it is 15 headed "Forensic computer examination". It doesn't bear 16 a date so I think we will have to do without that but it 17 says: 18 "Following a request by DC Jones of SECTU on behalf 19 of Surrey Police for Russian/Ukrainian speaking 20 personnel Ekaterina Clark-O'Connell and Snezhana Lennon 21 were seconded to view downloaded material from the 22 computer, we were asked to conduct searches of all PDF, 23 Word, Skype, jpeg and Excel documents in Russian and 24 Ukrainian ..." 25 In accordance with a forensic computer examination</p> <p style="text-align: center;">Page 40</p>

<p>1 strategy provided by you.</p> <p>2 That would indicate, am I right, that</p> <p>3 Ms Clark-O'Connell was in fact tasked with looking at</p> <p>4 all the Skype, or have I misunderstood?</p> <p>5 I call them "Skypes", is it "Skype messages"?</p> <p>6 A. I think it was a year's worth she looked at I think.</p> <p>7 Q. A year's worth?</p> <p>8 A. I think something, I have read that -- I am sure that</p> <p>9 was the case but ...</p> <p>10 Q. That was my impression but I understood from your</p> <p>11 evidence on Friday that you only looked at two weeks and</p> <p>12 that Justin Pollard, DC Justin Pollard, had sort of</p> <p>13 almost stumbled across Dzhirsa doing a bit of</p> <p>14 professional curiosity. Anyway she has looked at those</p> <p>15 things, or says she has, and then she rehearses various</p> <p>16 threats and things that might be relevant to your</p> <p>17 interest in threats and blackmail, "Don't do silly</p> <p>18 moves", "We have everything under control", details</p> <p>19 about where to transfer money, "You will go to prison</p> <p>20 for a long time", "If you want a safe free life you have</p> <p>21 to pay 300,000 roubles", which is £6,000.</p> <p>22 Then no direct documents found between Alexander and</p> <p>23 Hermitage but a few items of correspondence mentioning</p> <p>24 Hermitage. Then in the Skype folder, at 64579, from</p> <p>25 UK -- from Alexander to News Rus.com:</p> <p style="text-align: center;">Page 41</p>	<p>1 a Credit Suisse bank letter, notice of failure to</p> <p>2 provide additional collateral and notice of liquidation</p> <p>3 for failed margin call.</p> <p>4 Did that raise an eyebrow with you? This man was</p> <p>5 said to be fabulously wealthy and is apparently in</p> <p>6 trouble with Credit Suisse and cannot meet his margin</p> <p>7 calls?</p> <p>8 A. Not really because I think there was correspondence that</p> <p>9 he was having lawsuits taken out against him, he was</p> <p>10 selling underweight barrels of milk from his condensed</p> <p>11 milk so he clearly operated in a big financial</p> <p>12 environment and so nothing here jumps off the page that</p> <p>13 would suggest that this related to him being under</p> <p>14 threat or being murdered, it is just financial dealings</p> <p>15 with the multi-million pound businesses that he</p> <p>16 purported to be involved in.</p> <p>17 Q. What does jump off the page, doesn't it, even for</p> <p>18 someone who as you say was moving in multi-million pound</p> <p>19 circle is a bank statement from April 2011, "Money</p> <p>20 transaction from precious metals", the sum of</p> <p>21 \$500 million. That is a staggeringly large sum of</p> <p>22 money, isn't it?</p> <p>23 A. It is, yes.</p> <p>24 Q. Did that attract your attention?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 43</p>
<p>1 "Spoken to the lawyer, they have advised me not to</p> <p>2 mention Bill Browder for now."</p> <p>3 Did you know who was the owner of the</p> <p>4 News Rus.com -- or an owner of the News Rus.com Skype</p> <p>5 address?</p> <p>6 A. No.</p> <p>7 Q. You didn't make the link to Andrei Pavlov?</p> <p>8 A. No.</p> <p>9 Q. No?</p> <p>10 Then in relation to financial matters, there is</p> <p>11 a document, 135949, can you help me as to what that</p> <p>12 referencing system refers to, we have never seen any of</p> <p>13 these documents, probably no reason why we should but</p> <p>14 what is that a reference to? It is not a HOLMES</p> <p>15 reference, is it?</p> <p>16 A. No, I think that would be a reference to the files that</p> <p>17 were downloaded from the computer, that is my</p> <p>18 interpretation of that.</p> <p>19 Q. They were given these numbers internally, so people</p> <p>20 didn't get in a muddle as to what they were talking</p> <p>21 about?</p> <p>22 A. Well I would imagine so, yes.</p> <p>23 Q. Yes. So we have an Alliondo invoice, a Credit Suisse</p> <p>24 bank statement for Aliondo, a Credit Suisse bank</p> <p>25 statement for Quartel, credit of large sums of money,</p> <p style="text-align: center;">Page 42</p>	<p>1 Q. Were you aware that that transaction, with that date, is</p> <p>2 more or less exactly the time that Mr Perepilichnyy's</p> <p>3 Swiss bank accounts were being frozen by the Swiss</p> <p>4 authorities?</p> <p>5 A. Not at that date, I thought that was later on but no.</p> <p>6 Q. It may well be a misprint or a typo, it does seem</p> <p>7 an extraordinarily large sum of money but it didn't</p> <p>8 attract your attention?</p> <p>9 A. No.</p> <p>10 Q. Then over the page, towards the end, I think it is about</p> <p>11 three paragraphs up, she is talking about the computer,</p> <p>12 and she says:</p> <p>13 "My impression was that this computer was used not</p> <p>14 only by Alexander but the family as well, perhaps he had</p> <p>15 a different computer. There seemed to be not enough</p> <p>16 documents, emails or files relating to business work,</p> <p>17 leisure or personal information. Most retrieved</p> <p>18 documents [that is the one she has drawn your attention</p> <p>19 to] are dated 2011, not many for 2012."</p> <p>20 She was telling you, wasn't she, she didn't think</p> <p>21 they were looking at the right computer?</p> <p>22 A. Yes, which is what was raised with the family liaison</p> <p>23 officers which was to go back to Mrs Perepilichnaya and</p> <p>24 ask if there was another computer and to surrender that</p> <p>25 computer.</p> <p style="text-align: center;">Page 44</p>

<p>1 Q. Hmm.</p> <p>2 You told us on Friday your understanding of the</p> <p>3 position about Mr Perepilichny's life insurances, and</p> <p>4 you recited that you were aware that he had an existing</p> <p>5 policy with Aviva for 500,000 taken out in May 2012 and</p> <p>6 that he had then applied and got 2 million of cover from</p> <p>7 Legal & General.</p> <p>8 A. That's correct, yes.</p> <p>9 Q. You said that didn't seem to be anything very remarkable</p> <p>10 about that and anyway it was all to do with buying</p> <p>11 a house?</p> <p>12 A. As I understand it, that was what was reported later by</p> <p>13 Mrs Perepilichnaya but there was also within this</p> <p>14 correspondence or examination of the computer, reference</p> <p>15 to purchasing a property for between £5 million and</p> <p>16 £6 million, I think.</p> <p>17 Q. Well, it is obvious that, from -- I would suggest from</p> <p>18 the text that you have read that throughout 2012 the</p> <p>19 Perepilichnyys were looking to move. And it may be that</p> <p>20 they had amongst other ideas the idea of purchasing but</p> <p>21 most of the messages are about renting.</p> <p>22 A. Well, again, you know the fact he took life insurance</p> <p>23 policy out for that amount of money is a matter for him.</p> <p>24 I mean he was a very wealthy man and wanted to no doubt</p> <p>25 look after his family, so whether that was to maintain</p> <p style="text-align: center;">Page 45</p>	<p>1 L&G for 2 million. So in fact it wasn't a case of</p> <p>2 having 2 million plus 500, it was a case of having 3.5</p> <p>3 million and 5 in the pipeline, a slightly different</p> <p>4 picture.</p> <p>5 A. Again, it is a matter for Mr Perepilichny as to why he</p> <p>6 wanted those policies.</p> <p>7 Q. I am just wondering if -- it is nobody's fault but if</p> <p>8 you had had accurate information at the time, whether</p> <p>9 you might have attached rather more significance to this</p> <p>10 extraordinary accumulation of life insurance?</p> <p>11 A. Not really. I mean, when we went to see Legal &</p> <p>12 General, I mean they didn't raise any concerns, they</p> <p>13 were quite happy and surely they would have done these</p> <p>14 due diligence checks and found out he was applying for</p> <p>15 insurance and life insurance policies but clearly they</p> <p>16 were not bothered or concerned because they granted him</p> <p>17 the policy. So I mean I don't operate in the world of</p> <p>18 life insurance, so I am -- you know, it is what it is</p> <p>19 from my perspective, sir.</p> <p>20 Q. I think you told us on Friday that when Mr Perepilichny</p> <p>21 had checked into the Bristol hotel in Paris, that he</p> <p>22 hadn't given any false name.</p> <p>23 A. Not a false name, no.</p> <p>24 Q. No. What I think you perhaps forgot to mention was that</p> <p>25 he did give a false address?</p> <p style="text-align: center;">Page 47</p>
<p>1 himself in rented accommodation but clearly he was at</p> <p>2 the same time maybe making enquiries about purchasing</p> <p>3 a property.</p> <p>4 Q. How do you know he was a very wealthy man?</p> <p>5 A. Well, based on his report to Legal & General when he</p> <p>6 claimed he had £26 million worth of assets, £2 million</p> <p>7 worth of cashable assets I think it was and another</p> <p>8 figure of 1.1. That to me is someone that is</p> <p>9 an extremely wealthy person.</p> <p>10 Q. Yes, I don't know whether you have read the documents</p> <p>11 carefully enough to see that that information actually</p> <p>12 came not from Mr Perepilichny but from the bank called</p> <p>13 EFT.</p> <p>14 A. Well, that is how I understood that.</p> <p>15 Q. Do you know anything about them?</p> <p>16 A. Pardon?</p> <p>17 Q. Do you know anything about them?</p> <p>18 A. No.</p> <p>19 Q. In fact the position was that in May, Mr Perepilichny</p> <p>20 took out 500,000 with Aviva. In June he applied for</p> <p>21 5 million of cover with Ageas on three separate</p> <p>22 occasions through three different independent financial</p> <p>23 advisers. Also in June, all within a matter of days, he</p> <p>24 took out 1 million of cover with a company called</p> <p>25 Liverpool Victoria, known as LV, and then finally with</p> <p style="text-align: center;">Page 46</p>	<p>1 A. I wasn't asked that question. I was asked whether or</p> <p>2 not I would have known if he would have given any false</p> <p>3 or different name and my answer to that question was no</p> <p>4 I wouldn't. I was not asked about addresses.</p> <p>5 Q. You are in fact aware that he did give --</p> <p>6 A. Yes, he gave his Virginia Water address.</p> <p>7 Q. Did you think that was significant --</p> <p>8 A. No, because he was -- the reason for that visit was --</p> <p>9 well, he was not with his wife, so.</p> <p>10 Q. Sorry, I didn't hear?</p> <p>11 A. He was not with his wife, so whether that had some</p> <p>12 bearing on it, I don't know.</p> <p>13 Q. Hmm.</p> <p>14 I think he also almost certainly gave a false name</p> <p>15 and address at his local gym?</p> <p>16 A. Well I don't know about whether he gave a false name and</p> <p>17 address. An inquiry was made at the gym, but he was not</p> <p>18 a member under his name.</p> <p>19 Q. Let's have look at that, page 394 of the bundle, it may</p> <p>20 be quite important.</p> <p>21 Bad reference, sorry. 395.</p> <p>22 A. Sorry, what was the number?</p> <p>23 THE CORONER: 395.</p> <p>24 A. 395?</p> <p>25 THE CORONER: Do you have that? I think it is going to be</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 at the back -- I have it separate now.</p> <p>2 A. I've got a statement from --</p> <p>3 THE CORONER: No, you are in the wrong --</p> <p>4 MR MOXON BROWNE: You can put away bundle --</p> <p>5 THE CORONER: I think it is the first file you had.</p> <p>6 A. Bundle 1?</p> <p>7 THE CORONER: Yes, just try at the back of that, 395 and</p> <p>8 there is an officer's report.</p> <p>9 A. Yes, sir, got that.</p> <p>10 MR MOXON BROWNE: This is a report from Detective Constable</p> <p>11 Burkinshaw about the gym, he says:</p> <p>12 "The nearest gym to the Perepilichnyy home address</p> <p>13 is David Lloyds, Brooklands, Weybridge, in the absence</p> <p>14 of any details from the family liaison officers</p> <p>15 I contacted Amy in the membership office and she</p> <p>16 researched the system for any details of Mr and/or</p> <p>17 Mrs Perepilichnaya and their address. There was no</p> <p>18 record of them having any membership from the club. The</p> <p>19 David Lloyd club is yards from the entrance to the</p> <p>20 private estate and is the obvious choice, there are no</p> <p>21 other clubs in the immediate area."</p> <p>22 We know that on the evening of Mr Perepilichnyy's</p> <p>23 death, Mrs Perepilichnaya with her dog and her daughter</p> <p>24 actually visited the gym so it was obviously very local.</p> <p>25 Did you think that was significant, that he had --</p> <p style="text-align: center;">Page 49</p>	<p>1 Q. -- and if you leave aside some formal contact about</p> <p>2 identifying telephones or matters of that sort,</p> <p>3 Detective Constable Burden was the only police officer</p> <p>4 from Surrey Police who ever spoke with</p> <p>5 Mrs Perepilichnaya.</p> <p>6 A. I think that is correct, yes. I believe so.</p> <p>7 Q. No inquiries about who was at the house on the day of</p> <p>8 Mr Perepilichnyy's death, who was visiting, what cars</p> <p>9 were in the drive, where he had been?</p> <p>10 A. Sorry on what date?</p> <p>11 Q. On any date, apart from what she told Mr Burden on the</p> <p>12 day, never got any information from her at all.</p> <p>13 A. Well the FLOs tried to get information from</p> <p>14 Mrs Perepilichnaya when they went to see her and had</p> <p>15 contact with her on a number of occasions, so you</p> <p>16 know --</p> <p>17 Q. Were you aware -- sorry.</p> <p>18 A. I was just saying, efforts were made to find information</p> <p>19 from Mrs Perepilichnaya.</p> <p>20 Q. Were you aware that on the day of Mr Perepilichnyy's</p> <p>21 death, Mrs Perepilichnaya told Detective Constable</p> <p>22 Burden that Alexander had visited the gym prior to his</p> <p>23 jog?</p> <p>24 A. Well, without reading it, then I can't recall that now,</p> <p>25 no.</p> <p style="text-align: center;">Page 51</p>
<p>1 it looked as if he had joined that club under a false</p> <p>2 name?</p> <p>3 A. Well, no. I mean I read that as what it was. I mean,</p> <p>4 no, I mean he is not under a membership in that name, so</p> <p>5 I mean I can't explain why Mrs Perepilichnaya, I mean</p> <p>6 she may have thought that he was a member of a gym,</p> <p>7 because she told the FLOs he was a member of a gym. She</p> <p>8 may have thought that that is where he was, which is why</p> <p>9 she couldn't find him, so, you know, I don't read</p> <p>10 anything into that at all. Perhaps he wasn't truthful</p> <p>11 with her when he said he was a member of a gym. I don't</p> <p>12 know.</p> <p>13 Q. Were you aware that Detective Constable Burden, who is</p> <p>14 giving evidence I think later today, spoke with</p> <p>15 Mrs Perepilichnaya on the evening of Mr Perepilichnyy's</p> <p>16 death?</p> <p>17 A. Yes, I was aware he had spoken to her.</p> <p>18 Q. I think apart possibly from some formal exchanges and</p> <p>19 from talking to family liaison officers, he actually is</p> <p>20 the only officer who ever spoke to Mrs Perepilichnaya?</p> <p>21 A. No, he is not the only officer -- sorry, can you repeat</p> <p>22 the question?</p> <p>23 Q. If you leave on one side the family liaison officers,</p> <p>24 who have a special function --</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 50</p>	<p>1 Q. It sounds as if you were not aware of that fact.</p> <p>2 A. No, not on the day, no, sorry, I just thought he went</p> <p>3 for a run.</p> <p>4 Q. On the day?</p> <p>5 A. On 10 November, yes.</p> <p>6 Q. If that evidence is correct, that would present a very</p> <p>7 obvious line of inquiry, wouldn't it? It might suggest</p> <p>8 he was meeting someone and to locate the gym and we have</p> <p>9 got a very distinctive looking man, large distinctive</p> <p>10 looking man who no doubt would be recognised, do you</p> <p>11 think that might be something that you ought to be</p> <p>12 pursuing?</p> <p>13 A. Well that, is why Detective Constable Birkenshaw made</p> <p>14 inquiry at the gym.</p> <p>15 Q. And he was told we have not heard of that name and then</p> <p>16 dropped it?</p> <p>17 A. Clearly, yes.</p> <p>18 Q. Yes, sir, I have very nearly finished.</p> <p>19 Just I think one other matter I want to look at with</p> <p>20 you, which relates to a document produced by</p> <p>21 Ms Leadbetter, the analyst.</p> <p>22 Would you look, please at page 381 of the bundle.</p> <p>23 Do you have that?</p> <p>24 A. Yes.</p> <p>25 Q. Can you identify that as a timeline produced by your</p> <p style="text-align: center;">Page 52</p>

<p>1 analyst which deals with, amongst other things, at the 2 bottom, financial transactions? 3 A. Yes. 4 Q. If we go through that, we can see, for example, on 5 page 2, he is in Italy at the Grand Hotel Milano in the 6 middle of the page. 7 Then on page 3 there is a credit card payment to 8 Air France. 9 On page 4 at the bottom left we see Dining Suite 10 Restaurant Hounslow, on 8 November, which might be at 11 Heathrow one would think. 12 Then on page 5, on the left, we have a purchase made 13 in Paris and then we have got payments to various 14 hotels, including the Bristol, and then -- 15 THE CORONER: Can you see? It may be those are black on 16 yours. 17 A. I can't read those transactions here but I mean I am 18 familiar with there being transactions in France. 19 MR MOXON BROWNE: Yes. 20 Then on page 386, on the right-hand side, 10/11, 21 that is the day of his death, Tesco. 22 On page 7, 387, we have getting some petrol and then 23 that is it. 24 What is the history of this document, how did it 25 come into being?</p> <p style="text-align: center;">Page 53</p>	<p>1 are about to look at was quite plainly produced first. 2 I mean all this is dealt with -- 3 A. Yes, no, it was produced first and as part of the 4 original disclosure to Her Majesty's coroner 5 in April 2014, the -- I suppose the redacted version of 6 the timeline minus those eight transactions were 7 submitted but I also took instructions from Surrey legal 8 services as to the reasons for that and how we would 9 deal with the other matters. As I have done with other 10 documents in this case. 11 Q. We can find the document if we need to but if I just 12 remind you that Ms Leadbetter's personal notebook shows 13 that the version at page 373 was produced first and she 14 was then directed by you to produce a second version? 15 A. That's right, for the reasons I have explained. 16 Q. I thought that you were saying that the fuller version 17 was produced after the less full version, as a result of 18 some -- 19 A. Sorry, sorry. The fuller version, if that was first, it 20 would have been first, which is obviously why I had to 21 review the content of it based on the request made of 22 myself around the sensitivities of how that credit card 23 information was obtained, which is then when the second 24 one was produced. So that is the sequence of events. 25 Mr Moxon Browne is right in that regard but for the</p> <p style="text-align: center;">Page 55</p>
<p>1 A. Well, it was the -- it was a timeline produced by the 2 analyst that showed his movements, so it shows at the 3 top Mr Perepilichny and his movements, then the house, 4 then the phones and then the credit card. 5 Q. You see, what is a little bit puzzling is that there is 6 another version of this document, which starts on 7 page 373, which contains information which is omitted 8 from the second one. I am just trying to work out with 9 your help the relationship between the two documents. 10 Have a look at the one -- 11 A. No, no, I know exactly what you are talking about. 12 So there were two versions, because originally there 13 were eight transactions that were -- well, there was 14 some financial details obtained from a credit card 15 company that was for intelligence purposes only and 16 there were some sensitivities around that, so therefore 17 at that stage I couldn't include them in the overall 18 timeline. 19 However, as is what is required, the duty to review 20 material is ongoing, which I did, and so subsequently it 21 turns out that that -- I was able to use that 22 information, which is why there was then the second 23 timeline which included those transactions. 24 So that is the explanation, sir. 25 Q. I don't think that is right because I think the one we</p> <p style="text-align: center;">Page 54</p>	<p>1 reasons I have explained, that was the reason for that. 2 Q. Yes. 3 Let's have a look at page 375. You will see that 4 the third item which doesn't appear on the version that 5 was originally put before the coroner, credit card 6 payment to Kalinka food store in London, transactions 7 with Raiffeisenbank £24, and then someone, so it must be 8 Ms Leadbetter, has added a note: 9 "This is the food store used to purchase the 10 ingredients for AP's final meal prepared by Tatiana." 11 I just wanted to know where that information came 12 from, because I think we haven't heard that from 13 anybody, that that was where the food was bought? 14 A. Well, I assume that came from the family liaison 15 officer's reports, I wouldn't have thought -- well 16 I assume it came from the family liaison officer 17 reports. 18 Q. I mean the evidence we have heard is it either came from 19 a shop near Harrods, and I don't think Kalinka -- 20 Kalinka is in Bayswater I think, or from Tesco or 21 Sainsbury's but where does this Kalinka come from, who 22 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</p> <p style="text-align: center;">Page 56</p>

<p>1 the -- there were eight transactions that were</p> <p>2 originally sensitive -- I say "sensitive", but the</p> <p>3 disclosure of them was potentially sensitive. That is</p> <p>4 why it was removed. I thought I had explained that.</p> <p>5 Q. Yes. Can you help me as to what is sensitive about that</p> <p>6 information, which --</p> <p>7 A. Nothing now because it was then, the fuller timeline was</p> <p>8 produced, so nothing now.</p> <p>9 Q. Very well.</p> <p>10 A. It is not the content of the information, it is where it</p> <p>11 came from.</p> <p>12 Q. Then if you go over the page to 376, my copy is</p> <p>13 difficult or impossible to read. Yours may be the same.</p> <p>14 A. Same.</p> <p>15 Q. Along the bottom there, perhaps you will take it from</p> <p>16 me, none of those items appear on the second version and</p> <p>17 I think in each case they refer to visits to hotels in</p> <p>18 France.</p> <p>19 A. That's correct, yes.</p> <p>20 Q. Why did you take those out?</p> <p>21 A. I have explained and given an answer for that.</p> <p>22 Q. Then on page 6 of 8 --</p> <p>23 A. Page what number?</p> <p>24 Q. 6 of 8 -- sorry, 378, we have credit card payment to</p> <p>25 Tesco, financial transactions to Raiffeisenbank for</p> <p style="text-align: center;">Page 57</p>	<p>1 that there was any connection between Mr Perepilichny</p> <p>2 and an organised crime group?</p> <p>3 A. I based that on the evidence and the graded intelligence</p> <p>4 that was provided during the course of the</p> <p>5 investigation.</p> <p>6 MR MOXON BROWNE: Sir, I have finished. I have had two</p> <p>7 suggestions made to me. One is that Mr Fear-Segal would</p> <p>8 like to ask questions about the telephones and that the</p> <p>9 shorthand writers might appreciate a break.</p> <p>10 THE CORONER: I certainly agree with one of those.</p> <p>11 MR MOXON BROWNE: Which one?</p> <p>12 (11.49 am)</p> <p>13 (A short adjournment)</p> <p>14 (12.10 pm)</p> <p>15 THE CORONER: Yes.</p> <p>16 MR MOXON BROWNE: Sir, may I just ask your indulgence to ask</p> <p>17 one more question.</p> <p>18 THE CORONER: Yes, of course.</p> <p>19 MR MOXON BROWNE: Mr Pollard, can you look, please, at</p> <p>20 paragraph 87 of your witness statement.</p> <p>21 A. Sorry?</p> <p>22 Q. 87 of your witness statement. I am not quite sure where</p> <p>23 that is found.</p> <p>24 A. Yes.</p> <p>25 Q. If you look about halfway down:</p> <p style="text-align: center;">Page 59</p>
<p>1 approximately £5,983. Even if you are a Russian</p> <p>2 oligarch that is a very large sum, isn't it -- did that</p> <p>3 attract your attention when you were told that?</p> <p>4 A. No, and you will remember, Mr Moxon Browne, at</p> <p>5 a previous PIR that is a mistype, it is actually -- do</p> <p>6 you see the £593 or £583, we clarified that, which you</p> <p>7 were aware of.</p> <p>8 Q. Well, to be strictly accurate it was I who drew your</p> <p>9 attention to the fact it was a typo. What I want to</p> <p>10 know is when you were given that information by</p> <p>11 Ms Leadbetter, whether you thought it was something you</p> <p>12 thought you ought to be pursuing?</p> <p>13 A. No.</p> <p>14 Q. No.</p> <p>15 Do you agree with the proposition that your</p> <p>16 conclusion, as set out in your Operation Daphne report</p> <p>17 and as released to the press on 6 June 2013 that there</p> <p>18 was nothing suspicious about Mr Perepilichny's death</p> <p>19 was based on your failure to look at his connections</p> <p>20 with the Klyuev organised crime group and the</p> <p>21 information you were given by Hermitage?</p> <p>22 A. No, my conclusions were based on evidence and graded</p> <p>23 intelligence that led to those conclusions which was</p> <p>24 outlined in my report.</p> <p>25 Q. And still, as I understand it, today, you are denying</p> <p style="text-align: center;">Page 58</p>	<p>1 "In summary, the immigration applications included</p> <p>2 tourist visa, similar application 2005, current visa for</p> <p>3 a tier 1 investor visa, duration two years. All these</p> <p>4 applications seem perfectly reasonable and legitimate,</p> <p>5 none of them contained any asylum applications."</p> <p>6 Then you say:</p> <p>7 "And again provided evidence that Mr Perepilichny</p> <p>8 was not seeking refuge in the UK but was a foreign</p> <p>9 national seeking to legitimately remain in the</p> <p>10 United Kingdom for business purposes."</p> <p>11 I just wanted to ask you this, when you wrote that</p> <p>12 quite recently, were you aware Mr Perepilichny was not</p> <p>13 a tier 1 investor, the tier 1 investor was his wife?</p> <p>14 A. Well I thought they were both tier 1 investors, that was</p> <p>15 my understanding of it.</p> <p>16 Q. Were you aware that in order to put up the £1 million</p> <p>17 that is necessary Mrs Perepilichnaya borrowed the money</p> <p>18 from the EFG Bank?</p> <p>19 A. I was not aware that she had borrowed the money, no.</p> <p>20 Q. When you say that he was in the UK for business</p> <p>21 purposes, what business purposes had you in mind?</p> <p>22 A. Just what he set out on his visa, that he was a tier 1,</p> <p>23 wanted to invest in the United Kingdom.</p> <p>24 Q. But you cannot actually -- you are aware he didn't have</p> <p>25 any business interests here, aren't you?</p> <p style="text-align: center;">Page 60</p>

<p>1 A. No, he didn't but I gauged that by what was on his visa applications.</p> <p>2</p> <p>3 Q. What you wrote here was based on a fairly fundamental</p> <p>4 misunderstanding of the true position, wasn't it?</p> <p>5 A. No, I based it on the visa applications as to why he had</p> <p>6 permission to reside.</p> <p>7 MR MOXON BROWNE: Thank you.</p> <p>8 Questions from MR FEAR-SEGAL</p> <p>9 MR FEAR-SEGAL: Mr Pollard, you have told us at several</p> <p>10 points in your evidence that your concern was to conduct</p> <p>11 what you describe as a proportionate inquiry.</p> <p>12 A. Yes.</p> <p>13 Q. The scope of that proportionality was determined by the</p> <p>14 extent to which your investigation such as it was turned</p> <p>15 up evidence of threats or requests for protection money?</p> <p>16 A. Say again, sorry?</p> <p>17 Q. The scope of what was proportionate was going to be</p> <p>18 determined by the extent to which you were aware of</p> <p>19 threats or requests for protection money from</p> <p>20 Mr Perepilichnyy?</p> <p>21 A. No, it was also based around the pathology and</p> <p>22 toxicology.</p> <p>23 Q. Forgive me, aside from pathology and toxicology.</p> <p>24 A. Well, it is quite important.</p> <p>25 Q. In terms of determining whether Mr Perepilichnyy was the</p> <p style="text-align: center;">Page 61</p>	<p>1 and prior by Mrs Perepilichnaya?</p> <p>2 A. I wasn't now, I was aware of it then at the time, that</p> <p>3 the handset we had been given appeared to belong to</p> <p>4 Mrs Perepilichnaya.</p> <p>5 Q. Yes, but if we look, please, at page 120 in your</p> <p>6 bundle 9, at paragraph 12.5.</p> <p>7 A. Which bundle is it?</p> <p>8 THE CORONER: It is the first one.</p> <p>9 A. Core bundle, is it?</p> <p>10 MR FEAR-SEGAL: Your bundle 9, paragraph 12.5.</p> <p>11 THE CORONER: Page 120 at the bottom.</p> <p>12 A. Yes.</p> <p>13 MR FEAR-SEGAL: It says there:</p> <p>14 "Examination of the iPhone 4 indicated SIM card is</p> <p>15 not the one regularly used, it appears Tatiana gave us</p> <p>16 the wrong handset. Despite several requests for the</p> <p>17 handset Tatiana would not hand it over, however this did</p> <p>18 not adversely hinder our inquiries as a lot of</p> <p>19 information was obtained from the SIM card and email</p> <p>20 accounts of Alexander."</p> <p>21 What information was obtained from the SIM card?</p> <p>22 A. The call data.</p> <p>23 Q. Forgive me?</p> <p>24 A. Call data.</p> <p>25 Q. You are incorrect in that recollection, Mr Pollard.</p> <p style="text-align: center;">Page 63</p>
<p>1 subject of threats or requests for protection money, you</p> <p>2 had three exhibits, didn't you? You had two mobile</p> <p>3 phones and a computer?</p> <p>4 A. Yes.</p> <p>5 Q. Those three exhibits were of central importance to your</p> <p>6 investigation, weren't they?</p> <p>7 A. Part of the investigation, yes, along with the other</p> <p>8 inquiries I have outlined.</p> <p>9 Q. Your conclusion from your interrogation of those three</p> <p>10 exhibits, which we see at paragraph 13.2 of your</p> <p>11 concluding report, was that you are satisfied that there</p> <p>12 was:</p> <p>13 "... sufficient information obtained from the</p> <p>14 iPhone, that details his business and transactions</p> <p>15 sufficient to inform my inquiry that he was not under</p> <p>16 any threat."</p> <p>17 That is the meat and drink of it, isn't it?</p> <p>18 A. That was correct. That was my conclusion based on all</p> <p>19 of my inquiries, yes.</p> <p>20 Q. Yes. Looking first at the exhibit we call ST/03, one of</p> <p>21 the phones that was said to have been found on</p> <p>22 Mr Perepilichnyy. You are clear now, aren't you, that</p> <p>23 whilst that SIM card in the phone that was handed to</p> <p>24 police was associated with Mr Perepilichnyy, the handset</p> <p>25 was in fact used on the day of Mr Perepilichnyy's death</p> <p style="text-align: center;">Page 62</p>	<p>1 Nothing of any use at all was recovered from the SIM</p> <p>2 card.</p> <p>3 A. The SIM card provides the call data, as in the record of</p> <p>4 a call in and out and the content on a handset is</p> <p>5 records the content of text messages and emails and</p> <p>6 Skype messages.</p> <p>7 Q. Can you turn forward in that bundle to page 263.</p> <p>8 This is a report from DC Pollard. If we look under</p> <p>9 "Calls" there:</p> <p>10 "There is no call contact or message data recorded</p> <p>11 on the Cellbright or XRY SIM reports for ST/03."</p> <p>12 A. That is because that is the handset from Tatiana and the</p> <p>13 Cellbright and XRY is the computer software to remove or</p> <p>14 download information from a handset, so that is what</p> <p>15 DC Pollard is referring to there, there were no contents</p> <p>16 on that handset because --</p> <p>17 Q. Are you familiar with --</p> <p>18 A. Let me finish -- because it was the handset belonging to</p> <p>19 Mrs Perepilichnaya.</p> <p>20 Q. Are you familiar with Cellbright and XRY forensic tools</p> <p>21 Mr Pollard?</p> <p>22 A. I know their names but not their capabilities, and</p> <p>23 I don't need to know that either.</p> <p>24 Q. Just reread that sentence:</p> <p>25 "There is no call or contact data recorded on the</p> <p style="text-align: center;">Page 64</p>

<p>1 Cellbright or XRY SIM reports." 2 Not "the handset reports", "the SIM reports". He is 3 not talk being the haul off via Cellbright of handset, 4 he is talking about the SIM for ST/03. 5 A. That's correct, because there is no data held on the 6 SIM, as in content of messages, the SIM card is when you 7 request the call data in and out, is what is off the SIM 8 card, not data stored on the SIM card. 9 Q. I see. Well we would have to ask the other Mr Pollard 10 about that, I suppose. 11 A. No, I have answered the question, sir. 12 THE CORONER: Yes. 13 MR FEAR-SEGAL: Suffice it so say in relation to text 14 messages, Skypes, voicemails et cetera et cetera, you 15 couldn't get anything from the handset? 16 A. Not from the handset we believed to be 17 Mrs Perepilichnaya's, no. 18 Q. You did look at ST/02, which is both a handset and a SIM 19 associated with Mr Perepilichny? 20 A. Yes. 21 Q. But you only looked at the text messages for the 22 two-week period prior to his death? 23 A. That's correct. 24 Q. Why did you choose the two-week period? 25 A. I already answered that and it is recorded in my policy</p> <p style="text-align: center;">Page 65</p>	<p>1 A. No, that was because obviously by the time we got the 2 phones, as I understood it, the timeframe had gone 3 unfortunately and they were not downloaded themselves on 4 to the handsets. 5 Q. It was the delay in your making the request to Vodafone 6 which meant you were not able to get any voicemails, 7 wasn't it? 8 A. No, it was the delay in the time of the call to then us 9 obtaining the phones was the delay. 10 Q. Mr Pollard, if you had asked for the voicemails sooner, 11 you would have received them if they were there, 12 wouldn't you? 13 A. No because we -- no. I don't think we would have done. 14 Q. Well let's have a look at the email you wrote then, if 15 we look in I think it is Hermitage 5.3, it is certainly 16 the HOLMES bundles if we look at page 969 of that. 17 Rather if we start on 968, I think it is in 5.3. 18 If we look at page 968, Mr Pollard, this is 19 a correspondence between you and Mr Barrington about 20 looking at phones. There is quite a lot of technical 21 information but if we look on page 969, this is an email 22 that you have written to Nigel Jones and to 23 Roy Barrington. You say: 24 "Thanks for the update. We have made the inquiry of 25 the service provider regarding retention of voicemail</p> <p style="text-align: center;">Page 67</p>
<p>1 file. There is a tight and focused timeframe that would 2 enable us to establish information leading up to the 3 two weeks prior though his death that I thought was 4 a reasonable and proportionate period of time. 5 Q. Yes. You were not able to recover any text message 6 I think for the period 8 May 2012 to 24 October 2012? 7 A. Not -- I think they were Skype messages, there was no 8 data from that between those periods, that is correct. 9 Q. Because he was probably using another phone or maybe 10 just the XRY Cellbright wouldn't pick it up? 11 A. Yes, I don't know the answers to why that data was not 12 there. 13 Q. You accept you have got a patchy picture for although 14 not the two weeks prior to his death but the months 15 prior to his death? 16 A. Not really, I mean there was still some relevant 17 information, quite important information, that was 18 obtained in those two-week periods, so I don't see that 19 as being "patchy". 20 Q. Yes. 21 You didn't get a chance to listen to the voicemails 22 on ST/02, did you? 23 A. No. 24 Q. That was because of your delay in requesting the 25 information, wasn't it?</p> <p style="text-align: center;">Page 66</p>	<p>1 messages and the recovery of them. Unfortunately they 2 are only retained for a certain period of time and given 3 the delay in police reacting to initial concerns of this 4 inquiry we are out of time." 5 That is why I suggested if you had asked earlier you 6 would have got them but it was because of the delay, but 7 you didn't accept that proposition. Do you now -- 8 A. Yes, now I have read that. Yes, that is fair, yes. 9 Q. Thank you, you can put that bundle away now. 10 You also say in your report that you gleaned a lot 11 of information from the emails on ST/02 but the emails 12 that you got were, I will use the word patchy again, 13 would you accept that? 14 A. Well, they were what were contained on the phone. 15 Q. Yes, and there was not very much there, was there, we 16 can go through them if you like? 17 A. There was sufficient there that none of the emails 18 contained any information raising any concern. 19 Q. You appreciate the fact that a small section of the data 20 doesn't reveal anything raising any concern is different 21 from concluding on the basis of a small sample of data 22 that there is no reason for concern, you appreciate that 23 don't you, Mr Pollard? 24 A. It was not just that information that was taken into 25 account at the conclusion of my inquiry, it was based on</p> <p style="text-align: center;">Page 68</p>

<p>1 all of the aspects of my inquiry.</p> <p>2 Q. Yes. Can we look again at a document Mr Moxon Browne</p> <p>3 took you to which is in bundle 2, at page 723. It is</p> <p>4 the Ekaterina Clark-O'Connell report.</p> <p>5 Before we read it, if we consider the context. We</p> <p>6 are now talking about computers.</p> <p>7 What you have in ST/03 is somebody else's handset</p> <p>8 with none of the messages on it.</p> <p>9 What you have in ST/02 is Mr Perepilichny's handset</p> <p>10 with some of the messages but a section of the missing</p> <p>11 and no voicemails.</p> <p>12 What you have in ST/01, which is the computer you</p> <p>13 were given, is the family computer, isn't it?</p> <p>14 A. With some information relevant to Mr Perepilichny, yes.</p> <p>15 Q. We will come on to that but it was the police's</p> <p>16 conclusion and I think it is your position now that this</p> <p>17 was a family computer not used as Mr Perepilichny's</p> <p>18 main business computer?</p> <p>19 A. That was the inference from the examination of the</p> <p>20 computer, that he may well have had a computer --</p> <p>21 another computer but nevertheless there was obviously</p> <p>22 still some information on here that was able to inform</p> <p>23 my inquiry and conclusions.</p> <p>24 Q. Yes. You are strengthened in your conclusion that it</p> <p>25 was not the main business computer by something one of</p> <p style="text-align: center;">Page 69</p>	<p>1 A. Yes, that is my position. I don't dispute that he was</p> <p>2 not involved in a criminal investigation, but that is</p> <p>3 vastly different from claiming that he is some member of</p> <p>4 an organised crime group the name of which is only</p> <p>5 attributable on some website called "Russian</p> <p>6 Untouchables".</p> <p>7 Q. Mr Pollard, the question is not is he a member of a KOCG</p> <p>8 but is he connected to their dealings. I think we are</p> <p>9 getting to an answer that you now do think that he was</p> <p>10 in some way connected?</p> <p>11 A. No, Mr Perepilichny, my position is he was involved as</p> <p>12 part of a criminal investigation of which he was giving</p> <p>13 evidence to the Swiss authorities on.</p> <p>14 Q. Very good. Have a look at point 8 of what</p> <p>15 Ekaterina Clark-O'Connell raises, Mr Moxon Browne took</p> <p>16 you to it earlier, it mentions Aliondo and it mentions</p> <p>17 Quartel. Those are plastered all over as the Russian</p> <p>18 Untouchable website, aren't they, as being KOCG money</p> <p>19 laundering companies?</p> <p>20 A. As I say, I base my inquiry on evidence, not what is</p> <p>21 posted on YouTube videos which are on Russian</p> <p>22 Untouchable website or other material so I pay or take</p> <p>23 no recognition of what is on some website.</p> <p>24 Q. What you do have evidence here is not something that is</p> <p>25 on a website, it is accounts and invoices on</p> <p style="text-align: center;">Page 71</p>
<p>1 your assistants brought to your attention, that there</p> <p>2 was password saved under the title "Macbook" in one of</p> <p>3 the phone contacts, wasn't there?</p> <p>4 A. It appeared to be a password, that's correct, yes.</p> <p>5 Q. Mrs Clark-O'Connell finds some business transactions on</p> <p>6 the computer, doesn't she?</p> <p>7 A. Yes, she does.</p> <p>8 Q. Yes.</p> <p>9 You said at the end of the evidence you were giving</p> <p>10 in relation to Mr Moxon Browne's questions that you had</p> <p>11 seen no evidence that Mr Perepilichny was in any way</p> <p>12 connected with the matters that Hermitage were raising</p> <p>13 on their Russian Untouchables website.</p> <p>14 A. Not that he was not connected -- he clearly was involved</p> <p>15 because he was giving evidence to the Swiss authorities.</p> <p>16 Q. Yes, perhaps I have mischaracterised what you said, you</p> <p>17 have certainly said it was your position now that he had</p> <p>18 no connections to the KOCG?</p> <p>19 A. No, what I said was the inquiries with those law</p> <p>20 enforcement and intelligence agencies did not identify</p> <p>21 any connection to the organised crime is what I said.</p> <p>22 Q. Let me re-ask the question Mr Moxon Browne asked,</p> <p>23 because I have obviously misunderstood your answer.</p> <p>24 Is it your position now that Mr Perepilichny had no</p> <p>25 connections with KOCG?</p> <p style="text-align: center;">Page 70</p>	<p>1 Mr Perepilichny's computer?</p> <p>2 A. As I have said, he was involved in businesses, the full</p> <p>3 extent of those businesses I could never ascertain,</p> <p>4 which I covered in my concluding report, and all I can</p> <p>5 say is that he was involved as part of a criminal</p> <p>6 investigation, which he was assisting with in</p> <p>7 Switzerland.</p> <p>8 Q. It is your evidence that what we have set out by</p> <p>9 Ekaterina Clark-O'Connell are business transactions and</p> <p>10 you will say no more than that about them?</p> <p>11 A. Pardon?</p> <p>12 Q. What we have recorded by Ekaterina Clark-O'Connell at</p> <p>13 point 8 are what you describe as business transactions</p> <p>14 and you say no more about them?</p> <p>15 A. That's correct, yes.</p> <p>16 Q. Can we have a look at what you did say about them in</p> <p>17 your concluding report. If we look at page 121 of your</p> <p>18 core bundle can we look at paragraph 13.2, where you are</p> <p>19 discussing the computer. What you say there is:</p> <p>20 "What was absent from this computer was any</p> <p>21 reference to his employment, business, financial</p> <p>22 transactions et cetera, indicating this was possibly</p> <p>23 a family computer."</p> <p>24 Now, Mr Pollard, that is not right, is it?</p> <p>25 A. No, that is a fair point. I have obviously qualified</p> <p style="text-align: center;">Page 72</p>

1 **that in my statement but there was some information on**
 2 **that computer, so that's correct, yes.**
 3 Q. It wasn't just some information, it was information
 4 concerning accounts of a money laundering company?
 5 **A. Well, I am not in a position to say that that was**
 6 **a money laundering company.**
 7 Q. You are not in a position to say it but you are in
 8 a position to consider there might be a suspicion, risk
 9 or a line of inquiry that should be opened in relation
 10 to it. You are in a position to say that, aren't you?
 11 **A. No, I am not in a position to say that at all. All I am**
 12 **in a position to say is that there was information about**
 13 **business transactions or some information on his**
 14 **computer.**
 15 **MR FEAR-SEGAL: You dropped the ball here, didn't you,**
 16 **Mr Pollard?**
 17 **A. I didn't drop any ball, no.**
 18 **Questions from MS HILL**
 19 MS HILL: Mr Pollard, as you know I ask questions on behalf
 20 of Hermitage.
 21 I would like to ask you a couple of questions,
 22 please, about the process for certifying the scene
 23 initially as non-suspicious albeit that I know you were
 24 not involved in that. There is a couple of details
 25 I think you may be able to assist the learned coroner

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1 with.
 2 Could I ask you to be given volume 5, page 385. Do
 3 you see that document D259?
 4 **A. Yes.**
 5 Q. Thank you. This is a document, isn't it, that refers to
 6 some research that was done for your investigation,
 7 I think by what is called the RIO team, is that right?
 8 **A. No, this was done by Detective Constable Dando on**
 9 **15th -- well the report is dated 15 April.**
 10 Q. I see, but it is summarising is it not some research
 11 that has been done within the police force, that is what
 12 this report is doing, isn't it?
 13 **A. By Detective Constable Dando, yes.**
 14 Q. Yes, but what it is indicating, is this not right, is
 15 that some of these documents that are referred to under
 16 1 and 2 on this document have been obtained by open
 17 source material, because this is material the police
 18 have found by way of their research processes. Is that
 19 right?
 20 **A. That is what this report says at the time that this**
 21 **was -- well, when DC Dando did that search, yes.**
 22 Q. The reason I ask you that is because if you look at the
 23 second half of this page on 385, you will see that one
 24 of the documents that the police were able to obtain was
 25 a Barron's article that dealt with the issues around the

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1 large fraud and around Mr Stepanov. Do you see that?
 2 **A. Yes.**
 3 Q. I don't know, Mr Pollard, if you were in court last week
 4 when DCI Collwood was asked questions about this and he
 5 said that had he been aware of that information, in
 6 particular that Mr Stepanov had said in the public
 7 domain, if you look over the page, there was evidence
 8 about Mr Perepilichnyy having sought asylum, that he was
 9 in hiding and so on, that if he had seen that Barron's
 10 article he would have classified the scene as
 11 suspicious.
 12 From your investigation, can you confirm that that
 13 information was openly available to police officers at
 14 the time?
 15 **A. I can't -- I am not in a position to say what was**
 16 **available when they did the open source search on the**
 17 **night, no.**
 18 Q. Forgive me, the question is more that this is not
 19 information for example that is only available to those
 20 who subscribe to the Barron's service, this is
 21 information that your officers were able to obtain from
 22 the internet. Isn't that right?
 23 **A. It has been obtained through the internet, yes, but**
 24 **subsequent to the night of 10 November.**
 25 Q. I understand but some questions were asked of my client

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1 about whether Barron's is a subscriber service or not
 2 and I am asking you to agree that this is open source
 3 material based on what your officers found. Do you
 4 understand?
 5 **A. Yes, that's correct.**
 6 Q. We understand I think that you had no part to play in
 7 the initial classification of the scene as
 8 non-suspicious, I think that is right, isn't it?
 9 **A. Yes, it is, sir.**
 10 Q. Is this right, that we agree from your evidence last
 11 week that because the scene was not classified as
 12 suspicious there were various lines of inquiry that were
 13 not followed at that time?
 14 **A. Based on the decisions made at the time with the**
 15 **information that was known of the officers at the time**
 16 **that that was not classified as suspicious, the death**
 17 **was not classified as suspicious.**
 18 THE CORONER: Ms Hill is just saying to you that in the
 19 light of that, that there were some lines of inquiry or
 20 some steps that were not taken because of that
 21 classification.
 22 **A. Yes, that's correct.**
 23 MS HILL: The effects of that, Mr Pollard, is that the
 24 investigation you started was already hampered was it
 25 not by certain lines not having been followed. Is that

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<p>1 fair?</p> <p>2 A. That would be fair, yes.</p> <p>3 Q. In particular I think we agree on these, just very</p> <p>4 briefly, from your evidence last week. There was no</p> <p>5 detailed search of the area where Mr Perepilichny's</p> <p>6 body was found, the phones were not seized and</p> <p>7 interrogated immediately, which might have captured the</p> <p>8 voicemails for example, scenes of crimes did not attend,</p> <p>9 photographs were not taken, the CCTV was not seized,</p> <p>10 house-to-house enquiries were not followed up and, as we</p> <p>11 know, the first post mortem was not a forensic one.</p> <p>12 Those are some of the evidential steps that were not</p> <p>13 followed prior to your involvement; is that right?</p> <p>14 A. Yes, the only thing -- I mean there was some house to</p> <p>15 house conducted on the night, so that is not entirely</p> <p>16 accurate but in terms of the other inquiries that</p> <p>17 Ms Hill points out, that's correct, yes.</p> <p>18 Q. In fact the premise of my question about the</p> <p>19 house-to-house enquiries was that the officer who</p> <p>20 carried those out found four houses where nobody was</p> <p>21 home several hours after the death and I think the</p> <p>22 question really was that those house-to-house enquiries</p> <p>23 were not reinvigorated if you like, that there was not</p> <p>24 quite the attention given to them than there would have</p> <p>25 been if this was a suspicious scene. That is the basis</p> <p style="text-align: center;">Page 77</p>	<p>1 me if this is right. If you look please towards the</p> <p>2 bottom of the list of bullet points on that page,</p> <p>3 putting it very shortly to assist the learned coroner,</p> <p>4 I am sure he has the point already, is this right that</p> <p>5 there was a requirement given the technology of the CCTV</p> <p>6 to swap the hard drives in order to enable police to</p> <p>7 access the footage. Is that right?</p> <p>8 A. Yes, the estate would not allow us or the company would</p> <p>9 not allow us to -- well we had to remove the</p> <p>10 hard drives. We couldn't download it there and then</p> <p>11 because it was too complex and so forth, so we had to</p> <p>12 remove the hard drives and then issue them with</p> <p>13 replacement hard drives, which I did do at some cost.</p> <p>14 We obtained the hard drives from the systems to</p> <p>15 secure and preserve that evidence.</p> <p>16 Q. Is this right, Mr Pollard, just looking at the bullet</p> <p>17 point I think fourth from the bottom on this page that</p> <p>18 begins, "By the time ..." Can you see that? I will</p> <p>19 just read it out. What the email from Officer</p> <p>20 Justin Pollard says is this:</p> <p>21 "By the time the CCTV engineers were able to swap</p> <p>22 out the hard drives, it is believed all footage for the</p> <p>23 10 November 2012 had been overridden."</p> <p>24 There is some evidence it appears elsewhere of some</p> <p>25 officers looking at some CCTV, but do you understand</p> <p style="text-align: center;">Page 79</p>
<p>1 of that question.</p> <p>2 We accept there were some house-to-house enquiries</p> <p>3 but houses where people were not home a few hours later</p> <p>4 were not revisited, do you understand that?</p> <p>5 A. I understand that, yes.</p> <p>6 Q. Just in relation to the CCTV, because I don't think the</p> <p>7 learned coroner has heard very much about this and</p> <p>8 forgive me because the evidence is a little unclear</p> <p>9 about this, do you know now that Paul Scott from the</p> <p>10 estate security had been in touch with officers very</p> <p>11 early on raising the issue of CCTV and saying it was</p> <p>12 only going to be kept for seven days? Do you know now</p> <p>13 that that is what happened in the very early days of the</p> <p>14 inquiry?</p> <p>15 A. I think that was covered in DC Burden's report as</p> <p>16 I believe, and obviously when I became involved we went</p> <p>17 straight there as one of the fast track actions to try</p> <p>18 and recover the CCTV.</p> <p>19 Q. Again, could you be given, please, miscellaneous bundle,</p> <p>20 page 41.</p> <p>21 It looks like Mr Suter is coming to your aid,</p> <p>22 Mr Pollard.</p> <p>23 You have two copies of it now.</p> <p>24 Can you see at page 41 of the miscellaneous bundle</p> <p>25 an email exchanged dealing with the CCTV. Again, help</p> <p style="text-align: center;">Page 78</p>	<p>1 that bullet point to reflect the limitations on the CCTV</p> <p>2 that you faced?</p> <p>3 A. Yes, I mean I wanted to seize it anyway, but yes, I was</p> <p>4 aware that some or all -- some of the footage may have</p> <p>5 been overwritten or all of it but I still nevertheless</p> <p>6 felt it necessary to seize the hard drives in any event.</p> <p>7 Q. The point is this, is it not, that this court, this</p> <p>8 coroner, is not able to be helped by CCTV because of</p> <p>9 those issues in the early days of the investigation.</p> <p>10 That is right, isn't it?</p> <p>11 A. That's correct.</p> <p>12 Q. From your many years of experience, Mr Pollard, it must</p> <p>13 follow, mustn't it, that the early days of investigating</p> <p>14 a crime are in some cases the most important?</p> <p>15 A. Well, they are, but obviously the decisions made on the</p> <p>16 night were based on information that was known to those</p> <p>17 officers, and so that is how they reached their</p> <p>18 decisions. So what then comes afterwards clearly took</p> <p>19 us down a different route but that was the decision made</p> <p>20 on the night which is why that evidence wasn't obtained</p> <p>21 on the night. Or in the days -- or immediate days</p> <p>22 after.</p> <p>23 Q. Mr Pollard, I am not asking you to explain the actions</p> <p>24 of other officers, my question to you was a deliberately</p> <p>25 hypothetical one which is simply this. That it is the</p> <p style="text-align: center;">Page 80</p>

<p>1 case, is it not, that in many investigations -- of which 2 you have conducted many I am sure -- those early days of 3 an investigation can be crucial. That is right, 4 isn't it? 5 A. That's correct. The early days of an investigation 6 where they are suspicious are important days, that's 7 correct. 8 Q. Evidence can easily be lost if it is not preserved 9 immediately? 10 A. It can be in some cases, yes. 11 Q. In particular if there are people who have an incentive 12 to destroy evidence, they have an opportunity to do so 13 if those early days are not managed rigorously. That is 14 right, isn't it? 15 A. In some cases, yes, that would be correct. 16 Q. It must follow, Mr Pollard, must it not, that by the 17 time you became involved, I think 17 days after this 18 man's death, there is the potential that crucial 19 evidence, in addition to the CCTV and those lines of 20 inquiry I have set out already, had been lost? 21 A. In respect of what? 22 Q. Well, in principle what I am asking you to agree with 23 this is this proposition, that because those early days 24 of investigation are so important, you don't know what 25 evidence may have gone missing in those first 17 days?</p> <p style="text-align: center;">Page 81</p>	<p>1 Do you not agree with the general proposition that 2 the investigation that you inherited was hampered by the 3 failings in those early days? 4 A. No, I don't, based on the forensic post mortem and -- 5 no, I don't. 6 Q. I would like to move on now to ask you questions -- 7 THE CORONER: Ms Hill, today is one of those days when 8 I have to take our lunch break at a strange time. So if 9 we could break off now and start again at 1.45, if that 10 is all right. 11 MS HILL: Thank you, sir. 12 THE CORONER: Again, as usual you won't talk to anybody 13 about your evidence in the break. 14 A. No, sir. 15 THE CORONER: Thank you. 16 (12.40 pm) 17 (The Luncheon Adjournment) 18 (1.55 pm) 19 MS HILL: Mr Pollard, I would just like to go back if I may 20 and ask you one question I should have put to you before 21 lunch. Could I ask you to go to bundle 1, page 22. 22 This is the Barron's article that was put to 23 Inspector Collwood last week, 31 May 2011. Can you have 24 a look at that article and in particular look at the 25 bottom of page 22, where Mr Stepanov is quoted as saying</p> <p style="text-align: center;">Page 83</p>
<p>1 A. Or no evidence may have gone missing in those first 17 2 days but, you know -- well, as you say it is 3 a hypothetical question. 4 Q. As a simple example, because there was no a fingertip or 5 fingerprint -- I am not quite sure of the phrase, a very 6 careful search of the scene when Mr Perepilichnyy's body 7 was found, then it is perfectly possible, isn't it that 8 something that might have been on the scene that would 9 help this coroner understand whether he had been 10 poisoned in some way has gone missing and is no longer 11 available. That is exactly the sort of thing that is 12 possible, isn't it? 13 A. Well not in this case because obviously both post 14 mortems showed no evidence of restraint, attack or 15 injury or assault and more importantly the forensic post 16 mortem showed no evidence of hypodermic injection or any 17 objects in or under his skin alien to his body. So in 18 that regard, no, nothing would have therefore been 19 missed either on the night or subsequent. 20 Q. Mr Pollard, forgive me, you are not giving evidence 21 about toxicology, the learned coroner is going to hear 22 expert evidence about whether in fact certain poisons 23 remain in play in this case, whether it remains possible 24 that certain poisons were in fact used on 25 Mr Perepilichnyy.</p> <p style="text-align: center;">Page 82</p>	<p>1 this: 2 "That Stepanov blames his unsought stardom and 3 financial exposure on Mr Perepilichnyy, who Stepanov 4 says is hiding in London and owes money to Stepanov and 5 others." 6 Over the page, on 23, just below the second hole can 7 you see this: 8 "Alexander Perepilichnyy, this man owes me a lot of 9 money, as a matter of fact not only to me but also to 10 scores of other creditors, he cheated me by pocketing my 11 money and assets." 12 The evidence last week from the retired inspector 13 was that had he seen that he would have certified the 14 death as suspicious. Do you agree with that? 15 A. If that was known at the time, then that would have 16 warranted further examination of the case and yes, most 17 probably would have resulted in a forensic post mortem 18 being undertaken. 19 Q. Thank you. 20 I would like to move on now please to ask you 21 briefly about some of the letters and calls that were 22 received by Surrey Police from various lawyers before 23 you became involved. All right? 24 Is this not right, Mr Pollard, that within days of 25 the death, when you became involved, you did come to</p> <p style="text-align: center;">Page 84</p>

<p>1 understand that various people, various lawyers, had 2 approached Surrey Police independently to alert the 3 police to concerns about this man's death?</p> <p>4 A. Yes, that's correct.</p> <p>5 Q. Just to summarise it, and perhaps to assist the learned 6 coroner in putting it together, the first of those 7 contacts was from a lawyer called Mr Gherson -- perhaps 8 let me put it to you this way, fairly if I may, 9 Mr Pollard, sorry, it is my fault.</p> <p>10 Mr Gherson made contact with the police, there is 11 some evidence that was on 16 November, and some evidence 12 that was on 18 November, so on either of those days, 13 a lawyer called Mr Gherson made contact with the police, 14 is that right?</p> <p>15 A. Yes, he did make contact.</p> <p>16 Q. After that, or at around that time, on 17 November, 17 Hermitage made contact with a letter from their lawyers, 18 didn't they?</p> <p>19 A. Yes.</p> <p>20 Q. There was then, was there not, as far as you understand 21 it from the log, a telephone call from Mr Gherson, that 22 was the third such contact?</p> <p>23 A. Yes.</p> <p>24 Q. On 21 November. There was then the fourth such contact, 25 a call from Peters & Peters lawyers on 22 November, do</p> <p style="text-align: center;">Page 85</p>	<p>1 Q. When you came to understand that all these lawyers had 2 made contact with Surrey Police and expressed concerns 3 about the death, it must be right, mustn't it, that you 4 would have been concerned that those letters and calls 5 had not been actioned by Surrey Police?</p> <p>6 A. Well, that was part of the gold group, to look at those 7 circumstances but yes, I mean they should have been 8 followed up and progressed sooner without waiting for 9 Mr Raab to contact Surrey Police. Yes, I agree.</p> <p>10 Q. You are quite right to indicate to the coroner, I am 11 sure for his note he has it but the gold group minutes 12 at volume 2, 578/7 indicate there had been some missed 13 opportunities in those early days, didn't they?</p> <p>14 A. It was not picked up sooner. Yes, that's correct.</p> <p>15 Q. It must follow from your earlier evidence, Mr Pollard, 16 that if your investigation had been triggered at any one 17 of those points when a contact was made by a lawyer, 18 then your investigation would have started earlier than 19 it did. That must be right, mustn't it?</p> <p>20 A. Yes, that would be correct.</p> <p>21 Q. It is fair to assume, isn't it, that throughout this 22 time when lawyers are making contact and Surrey Police 23 were not responding the evidential clock was continuing 24 to tick, wasn't it?</p> <p>25 A. Well, it went on for longer, yes, it would have been</p> <p style="text-align: center;">Page 87</p>
<p>1 you know about that?</p> <p>2 A. I think that is recorded in the investigation log, yes.</p> <p>3 Q. Then finally there was a letter, again from Hermitage, 4 albeit from different lawyers, on 27 November. There 5 was a second later from Hermitage addressed to the 6 coroner but copied to Surrey Police, you know about 7 that?</p> <p>8 A. Yes.</p> <p>9 THE CORONER: Sorry, the date of that one, Ms Hill?</p> <p>10 MS HILL: 27 November, sir. If you want the reference, it 11 is bundle 1, page 300.</p> <p>12 You came to understand, did you, Mr Pollard, that 13 all of those lawyers had made contact with the police 14 prior to your involvement?</p> <p>15 A. Yes.</p> <p>16 Q. I think you accept now, don't you, that in fact the 17 contacts from those lawyers were not what triggered your 18 investigation but that it was in particular the input of 19 a local MP, Dominic Raab that did, that's right, isn't 20 it?</p> <p>21 A. That's correct, sir, yes.</p> <p>22 Q. It was the concern in particular that Mr Raab was saying 23 that a newspaper article was going to be published that 24 led to your investigation; that's right, isn't it?</p> <p>25 A. That is what started it, yes, that's correct.</p> <p style="text-align: center;">Page 86</p>	<p>1 better to have dealt with it sooner rather than later. 2 Yes, that would be fair.</p> <p>3 Q. I would like to ask you some questions now about some of 4 the lines of inquiry you pursued. I will try not to 5 repeat ground covered by my learned friends, so perhaps 6 I can take this relatively briefly.</p> <p>7 Dealing first with the evidence of 8 Mr Perepilichny's final movements in the UK. Dealing 9 with that issue, please, first, Mr Pollard, your 10 inquiries have given the coroner some sense of 11 Mr Perepilichny's final movements. What we don't have, 12 do we, are clear examples of witness accounts from 13 people who saw him on that last day. Apart from some 14 brief evidence from his wife there is no evidence, is 15 there, of people who may have seen him at the gym, 16 people who may have seen him at the shops that he went 17 to with his daughter or any evidence from his daughter. 18 That is right, isn't it?</p> <p>19 A. Well evidence from the chauffeur that collected him from 20 the airport, and obviously we tried to obtain evidence 21 from Mrs Perepilichnaya about his movements that day, so 22 that there was some witness evidence around his 23 movements.</p> <p>24 Q. I think the chauffeur brings him back to the house in 25 the morning. I am asking more about that final day,</p> <p style="text-align: center;">Page 88</p>

22 (Pages 85 to 88)

1 apart from what you have from Mrs Perepilichnaya, 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

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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:
 12 "Surrey Police have now confirmed that the visitor
 13 and incident logs were seized at the time of the inquiry
 14 to ensure it was secured in the event that it may have
 15 been necessary to examine it, but because there was no
 16 evidence to support the fact that Mr Perepilichny had
 17 been murdered those logs were not examined."
 18 **A. That's correct.**
 19 Q. Does this line of inquiry fit with some of the other
 20 lines of inquiry where your argument is along these
 21 lines, "Until I had proof there had been a murder,
 22 I didn't think it was appropriate to follow that line of
 23 inquiry"?
 24 **A. Well that would be -- yes, that is correct, because**
 25 **actually what am I looking for? So the point of ANPR is**

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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.**

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1 THE CORONER: There is something that captures automatic
 2 number plate recognition?
 3 **A. Yes, and there was a book with names registered in**
 4 **there.**
 5 MS HILL: The point I am making to you, officer, is that
 6 Surrey Police no doubt retain within its intelligence
 7 functionality number plates of cars that are linked with
 8 known criminals. That comparison exercise with the ANPR
 9 was not done, was it?
 10 **A. Well, because there was no known criminals to look for**
 11 **at that time.**
 12 THE CORONER: Sorry, can I just go back.
 13 There is a book with names that says who is coming
 14 in and out -- through a barrier or something, is it?
 15 **A. Yes, I think -- well, it is the visitor logbook. So if**
 16 **they are a resident they have a key fob to allow them**
 17 **through the barrier. If they are in a vehicle, the ANPR**
 18 **system automatically lifts the barrier because it**
 19 **recognises the number and if they are a visitor then**
 20 **their details are recorded in the visitor log, is my**
 21 **understanding.**
 22 THE CORONER: If you are a resident you have a fob which,
 23 what, will raise the barrier?
 24 **A. Or the gate, is my understanding of it.**
 25 THE CORONER: Or the gate.

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<p>1 A. Because you are a pedestrian. 2 THE CORONER: It won't log that. 3 A. No, my understanding is it is a written book. 4 THE CORONER: Hold on, so if you are a resident, does 5 anybody bother -- if I live there, and I've got a fob 6 for the key and I just go through, does anybody bother 7 to ask me who I am or do they just work on the basis if 8 I am a resident I come and go as I please? 9 A. Yes, that is my understanding, sir. 10 THE CORONER: Okay. 11 And if I am a resident in a car, the system will 12 recognise my number and will let me through? 13 A. That is my understanding, sir, yes. 14 THE CORONER: Again in that instance, if it is automatic, 15 just as if I am a resident with a fob, the car goes 16 through -- the resident's car goes through, does it 17 bother to make a record of that? Obviously it 18 recognises it is the resident's car, but does it bother 19 to -- 20 A. My understanding, I think that would be stored on the 21 ANPR system, would be my understanding. 22 THE CORONER: Okay, hold on. 23 If you are not a resident and you are either on foot 24 or in a car, somebody makes a record of it do they in 25 theory?</p> <p style="text-align: center;">Page 93</p>	<p>1 without going through the barrier, I mean is that just 2 unthinkable because it would be impossible or -- 3 A. No, no, I don't think it would be impossible at all. 4 You know, I think if you were determined to get in then 5 I think there would be ways where you could do that. 6 THE CORONER: Sorry, Ms Hill. 7 MS HILL: Not at all. If it helps you, sir, we do know from 8 volume 5, page 10, Mr Pollard you gathered this 9 evidence, didn't you, that I think there are eight 10 different entrances to the estate that allow vehicles in 11 and each of those has its own CCTV and things of that 12 nature. So there are eight different ways in which cars 13 can get on to the estate, aren't there? 14 A. Yes, I don't know if it was all vehicular access but 15 there are certainly eight points on the estate, yes. 16 Q. I am just reading out from the statement that your 17 investigation gathered, Paul Scott says, at page 10 of 18 volume 5: 19 "There are eight entrances which allow vehicular 20 access, one entrance is pedestrians only, two vehicle 21 entrances are padlocked closed." 22 That gives the coroner perhaps some sense of it. 23 That is page 10 of volume 5. 24 The point for your investigation, officer, is that 25 that comparison of the logs with any known criminals or</p> <p style="text-align: center;">Page 95</p>
<p>1 A. That's how I understand it, at the security gate, yes. 2 MS HILL: It is a handwritten record, I believe, sir, we 3 have copies of it. It is not in the bundle but somebody 4 who is arriving as the learned coroner is asking as 5 a non-resident also has to indicate, don't they, who 6 they are visiting. I think that is right, isn't it? 7 A. I believe so. 8 Q. We can furnish you with a couple of examples, sir, if 9 that would help. 10 THE CORONER: Help me, otherwise to get on the estate, 11 because I haven't really got a sense of this, obviously 12 there are various levels of security, I am assuming it 13 is not like a prison? 14 A. No. 15 THE CORONER: Equally, I mean everybody still bothers to 16 lock their doors if they live on the estate -- it is not 17 that secure, is it? 18 A. Sir, it is a massive -- some houses have gates in front 19 of them and so forth but yes, so -- 20 THE CORONER: What is there some kind of perimeter, how does 21 it work? Do you know? 22 A. No, not in its entirety, no but it obviously has 24-hour 23 security and security at the main vehicular entrances 24 and so forth. 25 THE CORONER: If somebody wanted to get into the estate</p> <p style="text-align: center;">Page 94</p>	<p>1 indeed any members of the KOCG was not done, was it? 2 A. No. 3 Q. In relation to -- 4 THE CORONER: I mean assuming somebody who was up to no good 5 uses their own vehicle. 6 A. Yes, yes. 7 MS HILL: Of course, sir. 8 THE CORONER: Because if they don't -- well, yes, all right. 9 MS HILL: Some vehicles are known and some are not known but 10 comparison was never done so we will don't know what the 11 fruits may have been. 12 A. No. 13 Q. Moving then if I may to Mr Perepilichny's final 14 movements in France, so backing up a little bit in time. 15 This is the position I think isn't it, Mr Pollard on 16 your evidence, that you obtained some information by 17 email about his movements in France. That's right, 18 isn't it? 19 A. There were email notifications of credit card usage in 20 France. 21 Q. You made some requests to find out about whether CCTV 22 was available from the Bristol hotel, that's right, 23 isn't it? 24 A. Yes, that's correct. 25 Q. In fact if we turn up please volume 2, page 470.</p> <p style="text-align: center;">Page 96</p>

<p>1 THE CORONER: Sorry, Ms Hill, you just gave a page reference 2 and I was making a note -- what page? 3 MS HILL: Volume 2, page 470. 4 THE CORONER: Thank you. 5 MS HILL: This is the regional organised crime unit 6 notification is it not Mr Pollard where you sent 7 a request to a man called Mr Wiseman, who was the SLO in 8 Paris. The request is the italics on page 470, isn't 9 it? 10 A. Yes. 11 Q. You asked for information about his stay at the Bristol 12 hotel, whether or not CCTV was available. The short 13 answer is that it was confirmed that he had stayed 14 there, but that CCTV I think was no longer available. 15 Is that right? 16 A. That's correct. 17 Q. There were some inquiries made of the female he had been 18 staying with; is that right? 19 A. Yes, that's correct. 20 Q. Beyond that though, is this the case, that you took the 21 view that any further requests for information from the 22 French authorities was something that would require 23 an international letter of request. Is that right? 24 A. Had that have been necessary, yes. 25 Q. You took the view that it was not appropriate to obtain</p> <p style="text-align: center;">Page 97</p>	<p>1 just, do I have that on this page? 2 MS HILL: Sorry, sir, I couldn't hear your question? 3 THE CORONER: You said something about an officer making 4 inquiries of a woman. Where do I get that? 5 MS HILL: Yes, I think separately inquiries were made, this 6 is apparent I think from the officer's report. 7 If you go over the page, you will see on 471 the 8 name of the female and I believe that attempts were 9 made, as the officer says in his witness statement, to 10 contact her and see if she could provide any 11 information, is that right. 12 A. Yes, we did make contact with her. 13 Q. If you scroll through to 472, you can see some further 14 information from the credit card and so on about the 15 Paris visit. Is that right? 16 A. Yes. 17 Q. If you continue, sir, just for completeness on this, 473 18 is the report about the possibility of CCTV and I think 19 the net result was that the CCTV, if you look at 474, 20 was only retained for a standard seven days and so was 21 not available to Mr Pollard, is that right? 22 A. That's correct, sir. 23 Q. If you look to 478, you will see confirmation I think 24 that as far as the French authorities were concerned or 25 as far as the liaison officer was concerned on 478, if</p> <p style="text-align: center;">Page 99</p>
<p>1 any more information about his movements in France 2 because you felt an ILOR was not appropriate? 3 A. No, based also on the meeting with the experts on 4 17 December, which didn't determine there would be any 5 useful inquiries to conduct in Paris. So for that 6 reason I didn't see there to be any need to approach the 7 French authorities to conduct inquiries in France. 8 THE CORONER: Can I just ask this, because we are on to 9 looking on. When you were just speaking earlier about 10 the two versions of the timeline, have I understood it 11 right that as far as, as it were, at one point some 12 extra information is concerned, I think you said you had 13 had that on an intelligence basis, is that right at that 14 stage? 15 A. Some financial transactions from a financial company. 16 THE CORONER: Yes, all right. But as it were on 17 an intelligence only basis at that time but not as it 18 were an evidential form at that point, so that is the 19 reason for that. Do I have it right? 20 A. Yes. 21 THE CORONER: Broadly speaking? 22 A. Broadly speaking, yes. 23 THE CORONER: Ms Hill, sorry you just said that -- is it on 24 this page too? Inquiries of the hotel about CCTV, and 25 you just said something about an inquiry of a lady but</p> <p style="text-align: center;">Page 98</p>	<p>1 anything further was needed from the French, an ILOR, 2 international letter of request, is what was required 3 and you explained why you didn't consider that 4 appropriate, officer? 5 A. Yes, that's correct and that is why I explained that 6 earlier, yes. 7 THE CORONER: Ms Hill, where is that? 8 MS HILL: On 478, sir, in the middle of the page. 9 THE CORONER: I see. 10 MS HILL: I think the SOCA liaison officer, Mr Wiseman, is 11 saying: 12 "Hosts [ie local officers] will not undertake 13 forensics without an ILOR." 14 THE CORONER: That is what you were being told, it was not 15 just you thinking that, you were being told that that 16 was required? 17 A. Yes, if the context around that was around hosts will 18 not undertake forensic examinations without an ILOR and 19 then obviously my decision was later informed after the 20 meeting on 17 December that I would not need to examine 21 or conduct forensic inquiries in Paris, based on the 22 advice I was given by the experts on 17 December. 23 MS HILL: It is clear from that documentation, isn't it 24 officer, that you asked specific questions about the 25 Hotel Bristol, because that is where you had understood</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 that Mr Perepilichny had stayed with the female in 2 question. Is that right? 3 A. That's correct. 4 Q. Without labouring the point too much, I think to assist 5 the learned coroner, we did go to look at some of the 6 credit card receipts around the hotel visits. I think 7 for your note, sir, it is bundle 5, page 257 and, sir, 8 you asked me the question, which was the most expensive 9 of the transactions of hotels and I am afraid I misled 10 you, sir, inadvertently because in fact one can see that 11 the most expensive hotel is on the following page, so it 12 is still a figure of over £1,000 or euros if I remember 13 correctly -- I don't remember what the figure was 14 exactly. 15 I will find the exact reference for you but you did 16 find a substantial transaction to that hotel, is that 17 right? To the Hotel Bristol? 18 A. Not to the hotel -- I thought the substantial 19 transaction was a €1,500 purchase of a Prada bag. 20 Q. Forgive me, in terms of hotels only, if you look on 257 21 of bundle 5 -- sir, do you want to pull this up while we 22 are dealing with this aspect of the evidence. 23 THE CORONER: It just slightly depends where it is. If 24 I don't, Ms Hill, I will look at it -- 25 MS HILL: Bundle 5, page 257.</p> <p style="text-align: center;">Page 101</p>	<p>1 that is what the apparent transactions show. 2 Q. We can no doubt marry them up but I am not sure that 3 there is clear evidence that they were definitely 4 relating to food but is that what your -- 5 A. Or purchases but I mean they were not significant 6 amounts, I mean they were just credit card transactions. 7 Q. All right. 8 You will no doubt have seen, officer, reports in the 9 press late last night about this case, you are familiar 10 with the Buzzfeed report from last night, are you? 11 A. No, I didn't -- I haven't read the Buzzfeed report. 12 Q. That report suggests the French authorities had tried to 13 secure assistance from the British police authorities -- 14 I will just read it out to you so you can answer it, it 15 says here: 16 "In France authorities have designated a case 17 a suspected organised assassination [it is said]. 18 French police have tried to investigate whether 19 Perepilichny was poisoned during his visit to Paris but 20 four senior French law enforcement officials said 21 British authorities have repeatedly frustrated those 22 efforts. It is said the death was not suspicious and 23 the Paris police should await the outcome of this 24 coroner's inquest." 25 Have you refused to give assistance to the French</p> <p style="text-align: center;">Page 103</p>
<p>1 THE CORONER: Thank you, yes. 2 MS HILL: There are on that page references to the 3 Hotel Bristol, Fouquet(?), which is said to be lodging 4 or hotels, the Four Seasons and the Hotel Crillon, yes. 5 A. Well, I will take your word -- I mean I haven't got the 6 document in front of me. 7 Q. The learned coroner asked what the most substantial 8 transaction for hotels, over the page there is a 9 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 12 hotel expenditure of some sort? 13 A. But not to that level, I think they are in the hundreds 14 of pounds for two people. Most of the transactions are 15 primarily food reservations for two people. 16 THE CORONER: Yes. 17 MS HILL: Just pausing there, officer, you knew from email 18 transactions that Mr Perepilichny had made some 19 reservations for dinner or lunch I think at different 20 places, didn't you? 21 A. Yes. 22 Q. Insofar as what was happening at the Fouquet, the Four 23 Seasons or the Crillon, are you saying that they were 24 definitely ones where food reservations had been made? 25 A. Well, again, without seeing -- I don't know but at my --</p> <p style="text-align: center;">Page 102</p>	<p>1 police, officer? 2 A. I have not had any contact with the French authorities 3 making that request of me. 4 THE CORONER: Who is the French policeman who says this? 5 MS HILL: It is simply said I read it out verbatim. 6 THE CORONER: The name of the officer, that is what will 7 help otherwise it is these things are -- 8 MS HILL: It simply says French police, I am afraid, that is 9 all it says. 10 We do know don't we, officer, that the French 11 themselves had initially made contact with your 12 investigation of their own volition before you tried to 13 make inquiries about the Hotel Bristol, hadn't they? 14 A. Not that I recall. I thought the inquiry was instigated 15 at our request when we knew that he was staying in 16 Paris, as I recall. 17 Q. If you look, please, at bundle 5, let me see if I can 18 get the correct reference here, bear with me a second, 19 bundle 5, I think I have page 135. That may not be 20 correct. Just bear with me a second. 21 This was a request from the French authorities, let 22 me get a proper citation for you, just bear with me. 23 Forgive me, I will come back to a proper reference for 24 that but you have no recollection of being contacted by 25 the French at the beginning of your investigation?</p> <p style="text-align: center;">Page 104</p>

<p>1 A. I have no recollection of that, no.</p> <p>2 Q. I see.</p> <p>3 Can I ask you now some questions, please, about your</p> <p>4 investigation's contact with Mr Perepilichny's widow,</p> <p>5 with Mrs Perepilichnaya.</p> <p>6 You came to understand fairly early on, didn't you,</p> <p>7 that she had fed him his last meal at lunchtime and he</p> <p>8 had died in the afternoon?</p> <p>9 A. Yes.</p> <p>10 Q. You didn't I think, yourself, obtain a detailed</p> <p>11 understanding of the Skype translations, did you?</p> <p>12 A. The – what Skype translations and text messages and</p> <p>13 emails were available within that two-week timeframe</p> <p>14 were translated.</p> <p>15 Q. Yes, but you yourself are not standing here now, are</p> <p>16 you, with a detailed understanding of what those Skype</p> <p>17 messages said line by line?</p> <p>18 A. What, in the two-week period?</p> <p>19 Q. No, generally, well beyond the two-week period, you</p> <p>20 yourself don't have a detailed understanding of the</p> <p>21 Skypes because your investigation did not translate them</p> <p>22 line by line, did it?</p> <p>23 A. Not all of the Skype messages, no.</p> <p>24 Q. No. An officer looked at the Skypes and came to you and</p> <p>25 said, "I think these are of interest". That is how it</p> <p style="text-align: center;">Page 105</p>	<p>1 A. That that may belong to Andrei Pavlov, yes.</p> <p>2 Q. And that he was in communication with Mr Perepilichny</p> <p>3 in late November 2011 expressing concern that the</p> <p>4 interrogation of Mrs Perepilichnaya's brother had gone</p> <p>5 badly?</p> <p>6 A. Well, there was a sequence of Skype message that started</p> <p>7 on 4 September with – between Mr Perepilichny and the</p> <p>8 Skype ID address. So they ran through a theme and</p> <p>9 I think the last correspondence was on 21 or</p> <p>10 22 November, but after that particular message, there</p> <p>11 was then some rectifying of that by Mr Perepilichny on</p> <p>12 reading those Skypes and the matter appeared to then</p> <p>13 have been resolved.</p> <p>14 Q. I am not asking you to justify anything Mr Pollard I am</p> <p>15 just asking you to answer the question, which is that</p> <p>16 that is what one part of the contents of the Skype</p> <p>17 suggested?</p> <p>18 A. But you have to look at it in its entirety, not just to</p> <p>19 the soundbites of certain individual Skype message.</p> <p>20 Q. Have you read Mr Browder's second statement?</p> <p>21 A. No.</p> <p>22 Q. Have you read the recent statement Mr Ismagilov put</p> <p>23 before this court?</p> <p>24 A. I have seen that statement.</p> <p>25 Q. Do you know, if you haven't read it, that in his most</p> <p style="text-align: center;">Page 107</p>
<p>1 worked, isn't it?</p> <p>2 A. They translated the various correspondence in that</p> <p>3 two-week timeframe.</p> <p>4 Q. You were not aware, were you, from the Skype</p> <p>5 translations that there was evidence within those Skype</p> <p>6 messages that Mrs Perepilichnaya's brother had been</p> <p>7 interrogated and it was perceived to have gone badly,</p> <p>8 and I quote that from the messages, that is not</p> <p>9 something you were aware of, is it?</p> <p>10 A. Not then but I have subsequently read them.</p> <p>11 Q. Do you now know that that was something that features on</p> <p>12 the Skype messages?</p> <p>13 A. Having read them subsequently, yes.</p> <p>14 Q. You now know I think, do you, that the understanding is,</p> <p>15 others may disagree, but there is an understanding,</p> <p>16 certainly within our team, that the person who is saying</p> <p>17 that the interrogation of Mrs Perepilichnaya's brother</p> <p>18 had gone badly was Andrei Pavlov, the lawyer for the</p> <p>19 KOCG. That is what is said on the messages, isn't it?</p> <p>20 A. The content talks about the interrogation and obviously</p> <p>21 the sender of that correspondence is the Skype ID of</p> <p>22 News Rus.com, yes.</p> <p>23 Q. Yes, and that there a basis to suggest that that</p> <p>24 News Rus.com address is Andrei Pavlov so at its highest</p> <p>25 that is what the Skype may suggest?</p> <p style="text-align: center;">Page 106</p>	<p>1 recent statement Mr Ismagilov makes a range of</p> <p>2 allegations against Mr Browder along the lines of the</p> <p>3 fact that he is a spy or that he has been involved in</p> <p>4 the death of a business colleague, things of that</p> <p>5 nature, do you know about?</p> <p>6 A. Yes, that yes, sort of similar allegations made the</p> <p>7 other way against Mr Perepilichny and other people,</p> <p>8 yes.</p> <p>9 Q. Have you been made aware of Mr Browder's evidence that</p> <p>10 those allegations made by Mr Ismagilov,</p> <p>11 Mrs Perepilichnaya's brother, are identical to ones that</p> <p>12 are made against him by the Russian government?</p> <p>13 A. To be honest, I haven't paid too much attention to the</p> <p>14 tittle tattle of those exchanges, frankly.</p> <p>15 Q. It is not tittle tattle. It is my client's evidence</p> <p>16 under oath, that is what he said. He said that there is</p> <p>17 a concern that he has that those allegations made</p> <p>18 against him by Mr Ismagilov mirror those that the</p> <p>19 Russian government make against him and he has said in</p> <p>20 terms he has concerns that Mr Ismagilov is acting under</p> <p>21 the direction of the Russian state. You know that,</p> <p>22 don't you?</p> <p>23 A. I don't know that, but I am --</p> <p>24 Q. You know that from his evidence, officer?</p> <p>25 A. I only read what Mr Ismagilov said and I didn't hear all</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 of Mr Browder's evidence, because I only came here on 2 Friday. 3 Q. I am his lawyer and I am putting to you that that is 4 what is in his signed statement that he approved under 5 oath. Are you not willing to accept what I am putting 6 to you, that that is what his evidence is, whether you 7 like it or not or agree with it or not, that is what his 8 evidence was? 9 A. If that's -- yes, that's fine, if it is his evidence, 10 yes. 11 Q. In terms of the contact that Surrey Police had with 12 Mrs Perepilichnaya, is this right, that the focus was on 13 giving her FLO support but that that had also 14 an investigative function? 15 A. Yes. 16 Q. You accept, I think, don't you, that the role of the 17 FLOs was not only to support her, but also to gather 18 evidence for your inquiry? 19 A. Yes. 20 Q. If the coroner needs a reference for that, one can see 21 in the FLO strategy document, let me just pull up the 22 reference for you, if you look, please, at volume 5, 23 I think it is page 235, it may be 285 -- sorry, it has 24 not copied terribly well, I think it is 235, please, of 25 volume 5.</p> <p style="text-align: center;">Page 109</p>	<p>1 need and so on. 2 "To gather evidence and information from the family 3 in a manner which contributes to the investigation and 4 preserves its integrity." 5 Do you see that? 6 A. Yes. 7 Q. This is much more, isn't it, than providing support to 8 the family, this is a role that is part of your 9 investigative strategy and your attempt to gather 10 evidence? 11 A. Yes, that's correct. 12 Q. The strategy makes clear over the page, doesn't it, if 13 you look on 985, please, at the end of the bullet points 14 at the top of that page, that the FLOs have to maintain 15 a liaison log which documents all contact with the 16 family and that strategy is subject to continuous review 17 and so on. So it was very much part of the documented 18 plan here that the FLOs were not only gathering evidence 19 but also had a make a clear note of it. That is right, 20 isn't it? 21 A. That's correct, yes. 22 Q. You were aware, weren't you, that the FLOs had provided 23 a significant amount of documented evidence about what 24 Mrs Perepilichnaya was telling them? 25 A. In their reports, yes.</p> <p style="text-align: center;">Page 111</p>
<p>1 A. Sorry, what was the page number again, please? 2 Q. In fact I think a better reference that is clearer is 3 page 982 of volume 5. 4 I think it will be in the later part of the 5 volume 5, sir. 6 Thank you. 7 Do you have a document headed "Family liaison 8 officer strategy" at page 982? 9 A. Yes. 10 Q. Do you see over the page the objectives of the strategy, 11 at page 983, are partly to provide information and 12 support to the family and so on? 13 A. Yes. 14 Q. Do you see that, "To secure the confidence and trust of 15 the family"? 16 A. Yes. 17 Q. "Provide them with information", but also, if you look 18 on 984, please, the top two bullet points on that page: 19 "To obtain information about his movements, and 20 whether he complained of feeling unwell, et cetera. 21 "To determine whether the family had received any 22 threats and in particular whether he had or whether his 23 routines and behaviour had changed. 24 "To keep under constant review whether they had 25 received any threats and whether there was a security</p> <p style="text-align: center;">Page 110</p>	<p>1 Q. You have on various occasions in your evidence been 2 asked questions about certain issues to do with the life 3 insurance and the mortgage and so on, haven't you? 4 A. Yes. 5 Q. On Friday, page 100 of the transcript you said this that 6 you now know that the life insurance policies were for 7 a mortgage. You don't know that, do you, officer? 8 A. As I understand -- I thought that was from Mrs -- 9 a statement that Mrs Perepilichnaya later gave to the 10 coroner at Woking, some time after clearly. That is my 11 recollection. 12 Q. That is her position, but that is only one side of the 13 evidence, isn't it? Do you know that the insurance 14 evidence could be read as suggesting something 15 different, that this was not about mortgage protection 16 but about family protection. You know that that is 17 another part of the evidence for the coroner to hear, 18 don't you? 19 A. Well I was not here when the insurers gave evidence so 20 I don't know. 21 Q. Can I ask you to look at the communications timeline, 22 which is a document that looks like this. (Indicates) 23 Which I hope is in the witness bundle, it was handed 24 out last week, it should be on the witness table 25 somewhere and if not we can give you -- I see Mr Suter</p> <p style="text-align: center;">Page 112</p>

<p>1 coming to your aid.</p> <p>2 Mr Pollard, this is a document that Hermitage has</p> <p>3 prepared, where it has put in chronological order the</p> <p>4 key communications be they by email, text, voicemail or</p> <p>5 matters of that nature. If you look, please, towards</p> <p>6 the very last page, and then come back in three pages,</p> <p>7 can you see an entry that is numbered 281 on the far</p> <p>8 left -- I'm sorry it is a little small.</p> <p>9 If you find the entry that is numbered 281 on the</p> <p>10 far left, you will see some entries that are for</p> <p>11 2 November 2012, can you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Sir, I don't know if you have that reference, it is line</p> <p>14 281, 2 November 2012, from Penny at Savills, do you see</p> <p>15 that?</p> <p>16 A. Yes.</p> <p>17 Q. There are after that a series of exchanges that begin</p> <p>18 this:</p> <p>19 "I wonder if you could clarify your maximum budget</p> <p>20 for a rental. I understood it to be £25,000 a month.</p> <p>21 There is another property we have in St George's Hill</p> <p>22 but it would be £50,000 a month. I assume this will not</p> <p>23 be of interest but thought I would mention it just in</p> <p>24 case."</p> <p>25 That is from Penny to Mr Perepilichny. He replies</p> <p style="text-align: center;">Page 113</p>	<p>1 of that page, and look at the entries that begin, line</p> <p>2 331, 12 November 2012. This is obviously after</p> <p>3 Mr Perepilichny's death but there are further</p> <p>4 discussions about him possibly renting Granville House,</p> <p>5 do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. With commendable persistence at the top of following</p> <p>8 page, Penny from Savills on 20 November:</p> <p>9 "Good afternoon, Alex, are you still searching for</p> <p>10 a rental property in St George's Hill, any further</p> <p>11 thoughts on Granville House?"</p> <p>12 Do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. This is communications that were all provided to your</p> <p>15 investigation that appear to suggest, do they not,</p> <p>16 Mr Perepilichny engaged in communications about renting</p> <p>17 properties?</p> <p>18 A. Well other than what was in the report from</p> <p>19 Clark-O'Connell that spoke about a possible purchase,</p> <p>20 but yes, these do also talk about rental property.</p> <p>21 Q. There is on the face of it some evidence that he was</p> <p>22 looking to rent a house not buy a house; isn't that</p> <p>23 right?</p> <p>24 A. On those transactions, yes.</p> <p>25 Q. Why is it you assume that in fact what</p> <p style="text-align: center;">Page 115</p>
<p>1 later that day saying:</p> <p>2 "Dear Penny, thank you very much for your letter.</p> <p>3 Can I ask which property is asking 50,000? Best</p> <p>4 regards, Alexander."</p> <p>5 Then there is discussion along these lines:</p> <p>6 "Would you consider a country estate if you could</p> <p>7 steal it? Look at my website, so and so Hill Estate is</p> <p>8 desperate, you could make money out of this."</p> <p>9 That is a different person communicating with him.</p> <p>10 It goes on then to say:</p> <p>11 "It is on at rental for 35,000 month, was on for</p> <p>12 12 million now dropped to offers over 8.5."</p> <p>13 Then just briefly further communication about</p> <p>14 Granville House being 45,000 furnished or 40,000</p> <p>15 unfurnished.</p> <p>16 Then Penny concludes:</p> <p>17 "I can confirm the landlord has requested we do not</p> <p>18 put forward any offers of less than £35,000, do let me</p> <p>19 know should you wish to come up to this level."</p> <p>20 He says:</p> <p>21 "Maximum budget. Dear Penny, I am interested to see</p> <p>22 a new house on Regona Road(?), best wishes, Alexander."</p> <p>23 Do you see all of those exchanges?</p> <p>24 A. Yes.</p> <p>25 Q. Just go, please, forward to the next page and the bottom</p> <p style="text-align: center;">Page 114</p>	<p>1 Mrs Perepilichnaya is saying, that this was for</p> <p>2 a mortgage is correct when there is evidence that may</p> <p>3 suggest that is not right?</p> <p>4 A. Well that is what Mrs Perepilichnaya said, so it is not</p> <p>5 an assumption, it is what she said.</p> <p>6 Q. That is my point with respect, officer. What I am</p> <p>7 trying to test here is whether you do, for whatever</p> <p>8 reason, accept what Mrs Perepilichnaya says at face</p> <p>9 value, she says it is for a mortgage, does that mean it</p> <p>10 must be right?</p> <p>11 A. Well, we have no reason -- I have no reason not to</p> <p>12 disbelieve Mrs Perepilichnaya, no.</p> <p>13 Q. Well, when there is evidence that might go against that,</p> <p>14 there might be, mightn't there?</p> <p>15 A. Well I mean that is what she said, there is obviously --</p> <p>16 you know, I accept there is correspondence around house</p> <p>17 rental but equally there was comments about purchasing</p> <p>18 property found on his computer. So, you know, I can't</p> <p>19 get into the mind of Mr Perepilichny as to what he was</p> <p>20 thinking, what his intentions were, what his timescales</p> <p>21 were, anything like that.</p> <p>22 Q. She had not been helpful to you, to put it as low as</p> <p>23 that, about the telephones, had she?</p> <p>24 A. No.</p> <p>25 Q. She had not been forthcoming about his financial</p> <p style="text-align: center;">Page 116</p>

<p>1 situation, his bank accounts abroad and things of that 2 nature, had she? 3 A. No, she had not. 4 Q. I am suggesting to you that for whatever reason you are 5 assuming that her account is correct rather than 6 approaching this in an independent and fair way? 7 A. No, I take it as what it is based on what she said. 8 I think there is a difference between her demeanour and 9 how, what she was going through at the time of our 10 inquiry to much later on in the inquiry when clearly, 11 you know, the passage of time has passed. So I mean 12 I don't think you can compare necessarily the two. 13 Q. Were you in court earlier last week when she gave her 14 evidence? 15 A. No. 16 Q. Have you been told that she has sought to distance 17 herself from what your FLOs reported? 18 A. Not really. I haven't discussed much of her evidence at 19 all, to be honest. 20 Q. Do you know that she has sought to say that what your 21 FLOs wrote down was not correct? 22 A. I understand that that -- yes, because I think -- yes. 23 She put into context her comments, as -- but that was in 24 an extract of a statement that I saw from her, yes. 25 Q. In any other case, officer, where a person had fed</p> <p style="text-align: center;">Page 117</p>	<p>1 That Surrey Police, rightly or wrongly, on your 2 watch those samples are thrown away, those samples might 3 contain direct evidence of a murder, "I now have no 4 direct evidence of a murder, therefore I have nothing to 5 investigate". Do you understand the circularity of what 6 you keep saying? 7 A. No, because the -- two meetings with the experts, they 8 were from very -- obviously from a number of different 9 disciplines and based on what we had available from the 10 forensic post mortem, based on their expertise, based on 11 their assessment of symptoms and so forth, they drew the 12 conclusions that led me to reach my conclusion that 13 there was no evidence of poisoning. They were very 14 detailed considerations, they were very detailed tests 15 that were undertaken, and so I can only base my 16 decisions on the advice that I was given from the 17 experts that were commissioned to look at what was 18 transpired to be a sudden death. So I can only be 19 guided by the experts telling me the outcome of the 20 tests and exclusion of symptoms. 21 Q. Sir, before I move to my next topic, for your note the 22 request from the police in France -- you may want to 23 look at this, officer -- is at page 105 of volume 5. 24 You were doubtful I think, officer, that the French 25 had made contact of their own volition. It is my typing</p> <p style="text-align: center;">Page 119</p>
<p>1 somebody their final meal and there was a concern that 2 they had died of poisoning not long after, would it not 3 follow that that person would be subjected to some kind 4 of proper interview? 5 A. No. Not without any evidence that they had been 6 poisoned and murdered, no. 7 Q. Isn't it better to start from the proposition that 8 someone might have been poisoned and approach the case 9 with an open mind than assume the reverse is true? 10 A. Well, no, actually it is -- I have approached it with an 11 open mind because on what basis would I seek to question 12 someone when I don't have any evidence that they have 13 been poisoned? 14 Q. You I think understand don't you that the effect of the 15 hospital post mortem was that samples from 16 Mr Perepilichny's body were tipped away. You know that 17 that is the case, don't you? 18 A. They were not tipped away. I think it needs to be put 19 into context. Having -- after that post mortem, 20 obviously the body or the stomach contents were washed 21 away but that was not a deliberate act, that is a fact 22 of what happens after a local post mortem. 23 Q. So I think the answer was yes. Do you understand then 24 the circularity of what you appear to be saying, let me 25 put this to you, does it go along these lines.</p> <p style="text-align: center;">Page 118</p>	<p>1 error, I had 5/135, it is 5/105. Can you be shown that 2 email, please, from the French police, 30 November 2012. 3 A. Sorry, what page number was it? 4 Q. Volume 5, page 105. 5 A. Yes, I've got it here, yes. 6 Q. Does that email suggest to you that on 30 November, 7 fairly soon thereof after Mr Perepilichny's death, the 8 French police liaison officer based at SOCA said this: 9 "I am trying to get in touch with someone dealing 10 with the investigation of Alexander Perepilichny, I was 11 contacted by our French police liaison officer in Moscow 12 who read about the death. I would be very grateful if 13 you could pass on the investigator's details." 14 Do you see that? 15 A. Yes, no and I did see this, so yes it is a French 16 liaison officer but the request has come from her via 17 their French liaison in Moscow. 18 Q. Yes, and you can see can't you at the bottom of 104 this 19 does then come to you, doesn't it? 20 A. Yes, no, yes, I have seen this, yes. That is different 21 to being asked what you put forward earlier. 22 This a request from her because she had been 23 contacted by her liaison officer in Moscow who had read 24 about the death of Mr Perepilichny -- 25 Q. The point is --</p> <p style="text-align: center;">Page 120</p>

<p>1 A. -- and he in Moscow would like circumstances of that.</p> <p>2 Q. The point is that this was of interest to those</p> <p>3 authorities before you approached them, wasn't it?</p> <p>4 A. On this request, yes, they had made contact asking for</p> <p>5 information about the death, yes, their French liaison</p> <p>6 in Moscow, yes, indeed.</p> <p>7 Q. I would like to move on now briefly if I may to the</p> <p>8 limits of the analysis of the telephone and the</p> <p>9 computers, but I will try and take this as shortly as</p> <p>10 I can.</p> <p>11 Dealing first with the computer, you accepted</p> <p>12 I think, didn't you, if you look, please, at your policy</p> <p>13 book, volume 2, page 568.</p> <p>14 Your policy book records at the foot of page 568 the</p> <p>15 decision was being made to request Mrs Perepilichnaya to</p> <p>16 provide her mobile phone handset for examination.</p> <p>17 A request for her to surrender and hand over Alexander's</p> <p>18 laptop, the justification being under 2 that:</p> <p>19 "The computer does not contain any information about</p> <p>20 Alexander's business, which is contrary to what inquiry</p> <p>21 has discovered to date would expect to see on the</p> <p>22 computer."</p> <p>23 Your policy documentation was to the effect wasn't</p> <p>24 it that what you had found on the computer was not what</p> <p>25 you would expect to have seen? That's right, isn't it?</p> <p style="text-align: center;">Page 121</p>	<p>1 fully open with you about the telephones, had she? You</p> <p>2 had concerns about what her accounts were about the</p> <p>3 phones?</p> <p>4 A. Yes, the handsets.</p> <p>5 Q. At one point, she said to you, did she, that she wanted</p> <p>6 the phones back because of the contacts that were in the</p> <p>7 phones, is that right?</p> <p>8 A. Yes.</p> <p>9 Q. Carry on please in your policy book and look at page 554</p> <p>10 of volume 2. There was various policy decisions made</p> <p>11 about the retention of the phones, weren't there, we can</p> <p>12 see one of them at 554. If you continue on through this</p> <p>13 group of decisions and continue to 564, ultimately you</p> <p>14 decided to retain the phones for further examination,</p> <p>15 under little (iii) on 564 you noted this, that when</p> <p>16 Ms Perepilichnaya was given a printout of the contacts</p> <p>17 she said she had access to them through iCloud, do you</p> <p>18 see that?</p> <p>19 A. Sorry, which --</p> <p>20 Q. On page 564?</p> <p>21 A. What is the policy entry number please.</p> <p>22 Q. Policy number 40 on page 564.</p> <p>23 A. Yes.</p> <p>24 Q. The decision is to retain the phones?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 123</p>
<p>1 A. Yes, that's correct.</p> <p>2 Q. That is because it was unrealistic, was it not, to</p> <p>3 expect an international businessman of this nature to</p> <p>4 have conducted his business without some kind of</p> <p>5 computer?</p> <p>6 A. Well, certainly that would appear -- I mean there were</p> <p>7 some limited information but yes, I would have expected</p> <p>8 to have seen more.</p> <p>9 Q. Do you have any knowledge of any other computer that</p> <p>10 Mr Perepilichny had access to?</p> <p>11 A. Other than the possibility of a Macbook that was picked</p> <p>12 up obviously or identified by the analyst, but that's</p> <p>13 why we went back to ask Tatiana for any other computers</p> <p>14 that he may have.</p> <p>15 Q. The Macbook was not seized, I think, it was never</p> <p>16 located, is that right?</p> <p>17 A. That's correct.</p> <p>18 Q. Do you have any knowledge of any other computer being</p> <p>19 taken away from the house or anything of that nature</p> <p>20 prior to your involvement?</p> <p>21 A. Not a computer, no. Not that I am aware of.</p> <p>22 Q. Or a laptop?</p> <p>23 A. No, not that I am aware of.</p> <p>24 Q. In relation to the phone analysis, you have agreed</p> <p>25 I think already that Mrs Perepilichnaya had not been</p> <p style="text-align: center;">Page 122</p>	<p>1 Q. The issue is at one point Mrs Perepilichnaya said she</p> <p>2 needed the phones back for the contacts?</p> <p>3 A. Yes.</p> <p>4 Q. Under (iii) she was told about the phones on 18 December</p> <p>5 and she was handed a printout of the contacts. She then</p> <p>6 said she had access to these through iCloud, do you see</p> <p>7 that?</p> <p>8 A. Yes, I do, yes.</p> <p>9 Q. Can you help us with when the phones were first returned</p> <p>10 to Mrs Perepilichnaya? They were taken from</p> <p>11 Mr Perepilichny's body?</p> <p>12 A. Yes.</p> <p>13 Q. When were they first given back to her?</p> <p>14 A. I think it is in the log. I think it may have been --</p> <p>15 it may have been 16 November. It is in the</p> <p>16 investigation log, I think. I think it is around about</p> <p>17 that date.</p> <p>18 Q. It is fairly soon then after the death, isn't it, it is</p> <p>19 within a matter of days of the death?</p> <p>20 A. It is, yes.</p> <p>21 Q. If you look, please, again just take that large A3</p> <p>22 document, the communications timeline. Find the entry,</p> <p>23 please, for 14 November, it is at the bottom of the</p> <p>24 penultimate page.</p> <p>25 Do you see the first entry for 14 November on the</p> <p style="text-align: center;">Page 124</p>

1 timeline?
 2 **A. Hang on. (Pause)**
 3 Q. It is that large A3 document, this one. (Indicates)
 4 **A. Yeah, I know the one you mean, but I haven't got it**
 5 **here. Sorry, I have not got it.**
 6 Q. You have lost it, okay. It is not in a folder, it is
 7 somewhere loose?
 8 MS BARTON: There seems to be something loose under that --
 9 MS HILL: There we go. If you look to the second to last
 10 page, officer, and look at the entry please for
 11 14 November. Can you see that at the bottom of the
 12 second to last page?
 13 **A. Yes.**
 14 Q. That somebody seems to be initiating a reset of the
 15 password for Mr Perepilichny's emails, do you see that?
 16 13 and 14 November?
 17 **A. Yes.**
 18 Q. Do you know who that was?
 19 **A. No.**
 20 Q. Do you know who had the phones at that time?
 21 **A. Without checking, no, I don't. I think they were still**
 22 **in the possession of the Surrey Police at that time.**
 23 Q. Do you know anything about how those passwords resets
 24 operate, whether you need to have the phone with you at
 25 the time or not?

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1 If you don't know then you don't know.
 2 **A. Not --**
 3 Q. Did you ever notice from the chronology that you looked
 4 at of communications that having taken place on 13th and
 5 14th? Did you notice that or is this something you are
 6 being asked about for the first time today?
 7 **A. I didn't notice that, no.**
 8 Q. It is, is it not, a potential concern that somebody was
 9 trying to change the access to his email on that day?
 10 **A. Well, possibly but as I say without knowing who did it,**
 11 **whether that was Mrs Perepilichnaya I am not too sure,**
 12 **but --**
 13 Q. Can I ask you to look, please, at your April 2017
 14 statement, which I have in bundle 2 but I am not
 15 entirely sure where others have put it. I don't know if
 16 somebody can help me with where the second statement of
 17 Officer Pollard is, it may be behind your August 2016
 18 one.
 19 **A. Yes.**
 20 Q. Do you have the April 2017 statement?
 21 **A. Yes.**
 22 Q. If you look, please, I don't know if the coroner has
 23 that statement, the second statement from
 24 Officer Pollard?
 25 THE CORONER: Sorry, I am just looking at it. Say again?

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1 MS HILL: I think it is going to be in volume 2, 626, which
 2 is where the first statement is.
 3 Is that where the second statement has been put in,
 4 officer?
 5 **A. It was at the front of my police core bundle.**
 6 MS HILL: I think Mr Suter can help you with where the
 7 second statement for Officer Pollard is. I do not have
 8 a pagination for it, it just says on the index
 9 a separate bundle, for our purposes.
 10 The coroner has it loose, does he?
 11 Do you have the April 2017 statement, sir, 19 April?
 12 THE CORONER: Yes.
 13 MS HILL: Is this right if you look at paragraph 14 and
 14 thereafter, officer, just taking it briefly, that the
 15 analysis of the emails came to some degree off the
 16 phones, didn't it?
 17 **A. Yes.**
 18 Q. So your email analysis was dependent on how the email
 19 had been set up on the phone. That is right, isn't it?
 20 **A. Well, yes, the email accounts on the phone, yes.**
 21 Q. Looking at what actually was translated, paragraph 15,
 22 for that email account, what was available was those in
 23 the sent and the inbox. For the second email account at
 24 17, what was looked at were the inbox and the trash
 25 messages, is that right?

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1 **A. That is because that is what was contained in those two**
 2 **boxes, yes.**
 3 Q. Yes, and then at 18, what was recorded there were emails
 4 from the inbox?
 5 **A. Yes.**
 6 Q. Yes?
 7 The point I am making is that your ability to access
 8 the emails was limited by the way in which it was set up
 9 on the phone and whether you could see the trash, the
 10 sent, the inbox or other folders. Is that right?
 11 **A. Well not really. I mean it was not limited. I mean we**
 12 **were able to access those emails on the phone and those**
 13 **different inboxes, sent boxes and trash boxes, the**
 14 **contents of those were screen-shot.**
 15 Q. That is why I am asking you, because if you look at 15,
 16 for that email account you have sent and inbox, at 17
 17 you have trash and inbox, and at 18 you have just the
 18 inbox.
 19 What I am suggesting to you is that there was not
 20 full availability for these email addresses, that is
 21 what your statement seems to suggest?
 22 **A. What my statement says is basically what was in those**
 23 **different boxes on the phones, so yes, all I can do is**
 24 **explain what was found.**
 25 Q. There is not for example on 15, for that email account,

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<p>1 seemingly a trash folder available, is there?</p> <p>2 A. No.</p> <p>3 Q. For the one at 17, there does not appear to be a sent</p> <p>4 folder available, does there?</p> <p>5 A. No.</p> <p>6 Q. For the one at 18, you only have the inbox so you have</p> <p>7 neither trash nor sent. Is that right?</p> <p>8 A. That's correct.</p> <p>9 Q. I don't mean to be pedantic about it, officer, but you</p> <p>10 draw lots of conclusions from the totality of the</p> <p>11 communications data and so it is important that the</p> <p>12 coroner understands what the limits on that data are.</p> <p>13 Do you understand?</p> <p>14 A. Yes, I wouldn't agree with the fact that they are</p> <p>15 limited but I take your point but they were still</p> <p>16 nevertheless correspondence over 50 correspondence</p> <p>17 certainly in the main email account, so I am -- I don't</p> <p>18 agree with your comment there.</p> <p>19 Q. Generally, I think this is right, isn't it, without</p> <p>20 turning it up, the coroner may want to note page 549 of</p> <p>21 volume 2, your policy book is where you set out this</p> <p>22 two-week limit on communications. That is broadly what</p> <p>23 you felt was proportionate; is that right?</p> <p>24 A. At that time, yes.</p> <p>25 Q. You therefore thought that when looking at</p> <p style="text-align: center;">Page 129</p>	<p>1 Mr Perepilichny firstly trying to reach an agreement</p> <p>2 about his evidence in Switzerland?</p> <p>3 A. There is correspondence that would appear to talk about</p> <p>4 that, yes.</p> <p>5 Q. That is evidence, is it not, that is evidence he is</p> <p>6 giving against an organised criminal group?</p> <p>7 A. Well, it is evidence he is giving against Mr Stepanov.</p> <p>8 Q. And those others involved in the large-scale fraud, yes?</p> <p>9 A. And, well, part of that fraud, that inquiry that was</p> <p>10 being conducted, yes.</p> <p>11 Q. He is trying to do a deal, isn't he, about what evidence</p> <p>12 he is going to give against members of the KOCG?</p> <p>13 A. Well, there is correspondence about the case, and what</p> <p>14 may or may not be said, so whether that is a deal or</p> <p>15 not, he is seeking to -- certainly he would appear to</p> <p>16 be -- minimise his role in that.</p> <p>17 Q. He says specifically in a conversation with the person</p> <p>18 believed to be Mr Pavlov, the KOCG's lawyer, that he</p> <p>19 would like to propose to "agree on our actions in</p> <p>20 Switzerland". He is trying therefore is he not to do</p> <p>21 a deal with organised criminals?</p> <p>22 A. Well, if it is to do a deal with organised criminals or</p> <p>23 to, whether it amounts to a bribe that may be what he</p> <p>24 was trying to do but it wasn't -- it was certainly with</p> <p>25 that correspondence with that one individual, where</p> <p style="text-align: center;">Page 131</p>
<p>1 communications of Skype messages and so on, that was the</p> <p>2 period of time that the officer should be looking at?</p> <p>3 A. At that time, yes.</p> <p>4 Q. If in fact what had happened here was that organised</p> <p>5 criminals had somehow murdered Mr Perepilichny, it is</p> <p>6 perfectly possible isn't it that you would only</p> <p>7 understand that by looking at a broader period of time</p> <p>8 than two weeks?</p> <p>9 A. Not necessarily, no.</p> <p>10 Q. Were you looking, through your officers, for an explicit</p> <p>11 threat to kill him?</p> <p>12 A. Certainly threats, intimidation, yes, something of that</p> <p>13 nature, yes.</p> <p>14 Q. Again, if one was actually dealing here with</p> <p>15 sophisticated organised criminals, one should surely</p> <p>16 look for something slightly more subtle than that, don't</p> <p>17 you agree?</p> <p>18 A. Well, having had the opportunity to look through all the</p> <p>19 Skype messages, I haven't found anything of a similar</p> <p>20 nature, be it subtle or not.</p> <p>21 Q. You maintain the position, do you, that even having now</p> <p>22 read the translated Skypes, you don't think they lead to</p> <p>23 anything of concern. Is that right?</p> <p>24 A. That's correct, yes.</p> <p>25 Q. You do know, don't you, that they refer to</p> <p style="text-align: center;">Page 130</p>	<p>1 those discussions were --</p> <p>2 Q. It is a pretty dangerous game, officer, isn't it, even</p> <p>3 if it was not an explicit threat, it is pretty dangerous</p> <p>4 to be negotiating with organised criminals in this way,</p> <p>5 isn't it?</p> <p>6 A. It is not for me to comment how Mr Perepilichny</p> <p>7 conducted himself but clearly he was aware of who he was</p> <p>8 dealing with, he was aware of what he was involved, and</p> <p>9 he didn't seemingly seem to be overly concerned about</p> <p>10 that and in fact I think after those correspondence in</p> <p>11 2011 he moves on to some other business venture with</p> <p>12 someone else via Skype.</p> <p>13 Q. He also moves on to further discussion, doesn't he,</p> <p>14 about the interrogation of Mr Ismagilov about which</p> <p>15 I have asked you questions already. Mr Pavlov's</p> <p>16 perception is that that went badly, putting it briefly</p> <p>17 the coroner can see the references from 19 to</p> <p>18 21 November that Mr Browder gave an interpretation of,</p> <p>19 but the coroner can read those Skype messages but I am</p> <p>20 quoting here from it. The person believed to be</p> <p>21 Mr Pavlov says:</p> <p>22 "If you do not arrive for interrogation, charges</p> <p>23 will be issued against you in a business as usual mode</p> <p>24 with the possibility of getting you detained at the</p> <p>25 border."</p> <p style="text-align: center;">Page 132</p>

<p>1 There was clearly discussion thereafter where 2 Mr Perepilichny was asking if searches and sanctions 3 could be postponed, so again there are clear discussions 4 here about the threat of legal proceedings, aren't 5 there? 6 A. The threat of legal proceedings, yes, of which he was 7 trying to negotiate his way out of. 8 Q. Did you understand that one of the ways that the KOCG 9 operates is to initiate fake legal proceedings against 10 people, be they civil or criminal? 11 A. No. 12 Q. You didn't understand even that that was how the fraud 13 was said to have been constructed? 14 A. Well the details of that fraud, I don't know the ins and 15 outs of a fraud but obviously fraud, clearly because 16 there was correspondence that I am sure documents were 17 forged. I think in Ms Clark-O'Connell's report she 18 makes reference of perhaps some dishonest dealings that 19 Mr Perepilichny had, because she made mention of some 20 forged documents. So that is all part of fraud. 21 Q. You know don't you that internationally there has been 22 widespread recognition that Mr Magnitsky, the lawyer, 23 was falsely detained and then killed. You know that, 24 don't you? 25 A. Mr Magnitsky was arrested and died in Russian police</p> <p style="text-align: center;">Page 133</p>	<p>1 group? 2 A. I think that is what is reported on the Russian 3 Untouchable website. I don't think Mr Pavlov would 4 describe himself if he was to be asked that question. 5 Q. The Skype messages did continue, didn't they, with 6 discussions around other matters to do with proceedings 7 potentially in Russia. Did you understand that from the 8 Skype messages? 9 A. From which dates? 10 Q. The Skype messages continue until early 2012 and it was 11 said by Mr Perepilichny that the evidence given by his 12 brother-in-law had been interpreted as a bribery attempt 13 and there was discussion about whether, if there was 14 cooperation, criminal charges could not be brought. Did 15 you understand that part of the Skype messages? 16 A. Yes, I think they were the messages with the Skype ID of 17 Bombarash 877 I think, because they then also talk about 18 some business venture in Smolensk. 19 Q. This is the man who is said to be the liaison person 20 between Mr Perepilichny and the KOCG and he 21 communicates their apparent desire for a payment of 22 €1 million and Mr Perepilichny comments on how that 23 seems quite a lot of money, but that appears to be the 24 price that is being asked for. Do you know that now 25 from the Skypes?</p> <p style="text-align: center;">Page 135</p>
<p>1 detention, yes. 2 Q. And that it is broadly accepted that he was detained for 3 no fair reason, so you do know this is part of what the 4 KOCG do, don't you? 5 A. Well I am not familiar with Mr Magnitsky's case to the 6 extent that I can answer that question. 7 Q. If you had read these Skypes, officer, or your team had, 8 what I suggest to you is that the threat here that was 9 being made by Mr Pavlov was of criminal or similar 10 proceedings against Mr Perepilichny if he did not 11 cooperate. Do you accept that? 12 A. Well if Mr Pavlov is a lawyer of the Russian interior 13 minister and if there is a crime that is recorded and 14 reported, then the legal professional people in Russia 15 would investigate that. Now if then Mr Perepilichny 16 chose to then try and mitigate his role in that by way 17 of a bribe, then clearly that is what those 18 conversations may have alluded to but after the 19 exchanges between September and November, all matters 20 appear to have been resolved and Mr Perepilichny 21 continued in his other business ventures. 22 Q. You knew though didn't you that it was said that 23 Mr Pavlov was part of this organised criminal group? 24 A. Sorry, who said? 25 Q. That Mr Pavlov was said to be part of this criminal</p> <p style="text-align: center;">Page 134</p>	<p>1 A. Yes, having read that, the cost of him not being -- or 2 his employees being indicted. 3 Q. One fair reading of that is that that is an extortionate 4 attempt; isn't that right? 5 A. Well, a fair reading of that would suggest that 6 Mr Perepilichny is trying to bribe his way out of any 7 criminal proceedings, and cost of that is €1 million, of 8 which he thought was a little bit expensive and asked if 9 that could be negotiated. 10 Q. Are you approaching the interpretation of these 11 documents, officer, with a fair and open mind? 12 A. I am approaching them based on the context of all of the 13 conversations rather than soundbites of particular Skype 14 messages. So that is my reading of it. 15 Q. The Skype messages end, don't they, in early 2012, so 16 this coroner cannot be assisted by anything beyond that 17 period until the time of his death. That's right, 18 isn't it? 19 A. Yes, that's correct. 20 Q. Because of the defects in the way in which the phone 21 evidence or email evidence was obtained? 22 A. Well I don't know the reason for that, whether that was 23 how it was obtained or not but there is a gap between 24 May and October, that's correct. 25 Q. Mr Perepilichny was recorded, for your note at page 779</p> <p style="text-align: center;">Page 136</p>

<p>1 of volume 2, as a regular user of Whatsapp and Viber, 2 wasn't he? 3 A. Yes. 4 Q. There was no attempt or ability to analyse those 5 accounts for him. That is right, isn't it? 6 A. Clearly they were not retrieved, so I don't know the 7 technical reasons for that, whether they are retrievable 8 or not but they weren't, no. 9 Q. You suggested on Friday that he was a social media user 10 but we have no evidence of that, do we? 11 A. Well just through his phone and method of communication. 12 Q. What do you mean by social media, Facebook, Instagram? 13 A. Well, the Whatsapp, the Viber and the Skype, so that is 14 social media to me. 15 Q. I see, I see. 16 You have been asked questions repeatedly about the 17 assertion that you made in your report that you had no 18 intelligence about his links with organised criminal 19 groups. You had been aware, hadn't you, that in 2010 20 Moscow Interpol had asked for information about 21 Mr Perepilichny? 22 A. It asked if he had any property in the UK, it was 23 a request for information. 24 Q. Can you turn that up, please, it is volume 5, 25 page 511 -- the learned coroner should perhaps look at</p> <p style="text-align: center;">Page 137</p>	<p>1 a difference. So he was a suspect of a fraud, a suspect 2 of a fraud. 3 Q. Yes. International criminal law colleagues suspected 4 him of involvement in organised crime and money 5 laundering, didn't they? 6 A. Suspected him, yes. 7 Q. Why are you so determined to say that you had no 8 intelligence at all about his involvement in organised 9 crime? 10 A. Because that is correct, this was a request for 11 information, it isn't graded intelligence at all, it 12 says he is a suspect and they are asking for -- they 13 don't even detail what the fraud was. They make no 14 reference themselves to the Klyuev organised crime 15 group. It is request for information. It is not graded 16 intelligence of any provenance and the request was for 17 whether he had got or obtained property in the UK, so 18 that is -- 19 Q. Turn over the page, please, to 513, just briefly, the 20 learned coroner can see that a similar request was 21 made -- 22 A. It's the same request. 23 Q. -- after Mr Perepilichny's death, on 5 December 2012 24 but in fact a broader request, covering property in 25 different places, not just in England. That's right,</p> <p style="text-align: center;">Page 139</p>
<p>1 this quite carefully, please. 2 It is a chain that begins at 509 but the key part 3 I think is 511. 4 A. What was the page number again, please? 5 Q. Page 511, volume 5. 6 A. Yes. 7 THE CORONER: Yes. 8 MS HILL: That is a document, isn't it, dated 9 12 October 2010, from Interpol in Moscow saying this, 10 isn't it: 11 "Please be informed that our department for 12 combating economic crimes of Moscow is conducting 13 a check against Mr Perepilichny, who is suspected of 14 fraud, money laundering and abuse of power. In the 15 course of the check it was revealed that in the period 16 of time from 2007 to 2009 he has organised a criminal 17 group to misappropriate money belonging to legal persons 18 [continuing over the page] he had laundered money 19 received illegally abroad and through his wife had 20 purchased real estate in the UK." 21 As far as the Interpol request was concerned it 22 specifically referred didn't it to their suspicion that 23 he was involved in organising a criminal group and 24 laundering money? 25 A. What it says is that he was a suspect, so there</p> <p style="text-align: center;">Page 138</p>	<p>1 isn't it? 2 A. That is correct, yes. 3 Q. That did amount to material suggesting that Interpol 4 were concerned about his links with organised crime, 5 weren't they? 6 A. No, what that says is that he was a suspect in a fraud 7 which was -- part of that fraud of which was being 8 investigated by the Attorney General's Office in 9 Switzerland, for which Mr Perepilichny was giving 10 evidence, so ... 11 Q. The Swiss authorities were also concerned, weren't they, 12 about what Mr Perepilichny's evidence showed, about his 13 involvement in the fraud that they were investigating. 14 That's right, isn't it? 15 A. Well I think Mr Perepilichny himself volunteered the 16 information that he knew that the funds from Mr Stepanov 17 had been obtained from criminal means. 18 Q. If you look, please, at the Swiss material that begins 19 at volume 1, page 314. 20 Can you see the Swiss line of communications 21 beginning at volume 1, page 314? 22 A. Yes. 23 Q. Others may have concerns about the quality of 24 an Interpol Moscow request but this is communication 25 from the Swiss authorities talking about</p> <p style="text-align: center;">Page 140</p>

<p>1 Mr Perepilichnyy's status in their investigation. Your 2 questions are at 314, and the answers are at 317, which 3 suggested at 317 didn't it that he was questioned as 4 a mixed status person between witness and accused. Do 5 you see that? 6 A. Yes. 7 Q. What was being investigated here was a high level fraud, 8 wasn't it? 9 A. It was a fraud, yes. 10 Q. While we are here, we can just look up, please, 11 page 324. At the top of page 324 you knew didn't you 12 that Mr Perepilichnyy had said to the Swiss that he was 13 concerned that he would end up in the same situation as 14 Sergei Magnitsky. Do you see that at the top of 324? 15 A. "He could end up in the same situation as Hermitage or 16 even like Sergei Magnitsky." 17 Q. Yes. That is what your inquiries of the Swiss revealed 18 he had told the Swiss, wasn't it? 19 A. Yes. 20 Q. Is this right, that as far as the Swiss inquiries are 21 concerned, you took a similar view that those email 22 exchanges were sufficient evidence from the Swiss and 23 you were not going to obtain any more case material from 24 them, is that right? 25 A. Well, again, if I had have wanted any further material,</p> <p style="text-align: center;">Page 141</p>	<p>1 I think didn't you the significance of the 2 13 September 2012 date? 3 A. That was the date that Mr Stepanov had been interviewed, 4 yes. Two dates. 5 Q. That is the date on which Mr Stepanov was told he was 6 going to face the confrontation; isn't that right? 7 THE CORONER: Page 318, number 4. 8 MS HILL: Page 318. 9 A. Yes, 13 September, sir. 10 Q. When you read that, officer, was that not a matter of 11 some significance to you? 12 A. Not really. As I say, I mean I am not familiar with 13 that particular process in that country but if that is 14 the manner in which those matters are dealt with, 15 Mr Perepilichnyy was more than happy to support that 16 investigation and although he only attended once in 17 person, on 26 April, his solicitors were still in 18 contact with the Swiss authorities and I think they 19 wrote a letter dated October 2012, which was the last -- 20 in fact they did on 1 October. So clearly he was still 21 willing to cooperate in that investigation. 22 Q. The Skypes indicated, didn't they, an attempt earlier in 23 this chronology by Mr Perepilichnyy to make some kind of 24 arrangement about his evidence in Switzerland, in 25 Lausanne in particular, that this date of 13 September</p> <p style="text-align: center;">Page 143</p>
<p>1 then they requested an international letter of request 2 but I was satisfied with the questions that I had asked 3 and the responses that I had been given, that at that 4 stage didn't require me to obtain any further 5 information from them. 6 Q. Just look back at 322, please. Does the bottom of 322 7 reflect this, that the federal criminal police had been 8 instructed to make contact with the British to find out 9 whether Mr Perepilichnyy's death was natural or not, 10 because he was a key witness in the ongoing 11 investigations, and possible protection measures could 12 arise according to the results of the toxicology tests. 13 Is this not right, that the Swiss were also keen to 14 understand the fruits of your investigation? 15 A. Yes, they were, yes. 16 Q. Did you provide them with any further information? 17 A. Well, I did around the circumstances -- well the fact 18 that the death was not through poison or murder, yes, 19 I did give that them update, yes. 20 Q. They made clear to you didn't they their concern that 21 three witnesses had already died in connection with that 22 particular case? 23 A. Yes, I think they referred to that or obtained that from 24 the Russian Untouchable website. 25 Q. Just for completeness on this issue, at 318, you knew</p> <p style="text-align: center;">Page 142</p>	<p>1 told you, didn't it, that his evidence in fact was now 2 going to be used against Mr Stepanov. That was 3 significant, wasn't it, that Mr Stepanov then knew that 4 on 13 September? 5 A. He would have known that, yes. 6 Q. That was about six weeks, was it not, before 7 Mr Perepilichnyy died? 8 A. Yes. 9 Q. Did you understand that there were other cases where 10 people had been giving evidence against members of the 11 Russian organised criminal group who have died before 12 they give evidence? 13 A. Only limited, based on the -- what was on the Russian 14 Untouchable website, no ... nothing from official law 15 enforcement. 16 Q. Did you marry that up, that information, with the date 17 of 13 September? 18 A. No, because, as I say, the outcome of all of the tests 19 did not establish that he had been murdered or poisoned, 20 and so had that have been different, then, yes, as 21 I have said previously, I may well have reviewed my 22 lines of inquiry and this may then have featured as more 23 of a line of inquiry, prominent line of inquiry. 24 That on its own does not tell me that he was then 25 murdered.</p> <p style="text-align: center;">Page 144</p>

<p>1 Q. It is a matter of common sense, isn't it, that 2 Mr Stepanov would not have been very pleased by that 3 news, would he? 4 A. I am sure he wouldn't, but that still doesn't mean that 5 Mr Perepilichny was murdered. 6 Q. Do you know that he was dealing with his Swiss lawyers 7 right up until date of his death? Having communications 8 with his Swiss lawyers until very close to the date of 9 his death? 10 A. His lawyers, yes, because that is the emails. 11 Q. You can see I think if you look again on the A3 12 chronology, take it from me perhaps, around three pages 13 in from the back? 14 THE CORONER: Hold on, I have 11 pages of this but if that 15 is right -- 16 MS HILL: It is 1 November, sir, it is the entry that is 17 numbered page 278 on the far left. 18 THE CORONER: Hold on. 19 For me that is page 9, yes. 20 278, third one down? 21 MS HILL: Third one down, 1 November. 22 THE CORONER: Yes. 23 MS HILL: Sorry, fourth one down, 1 November is "Can we get 24 a better price on Pinebrook", 2 November is this one: 25 "Dear Alexander, I refer to our meeting of Wednesday</p> <p style="text-align: center;">Page 145</p>	<p>1 A. Based on what was put on the Russian Untouchable 2 website, yes. 3 Q. No, based on what the Swiss told you, "DC Pollard spoke 4 to the Swiss authorities and Alexander is the fourth 5 witness in their case to die". 6 A. Right. 7 Q. In their case. 8 A. In their case, based on what was on the Russian 9 Untouchable website. 10 Q. I don't think that is a fair point, is it, if you look, 11 please, at page 328. 12 It is my final question on this topic, sir. 13 THE CORONER: 328. 14 MS HILL: Volume 5, page 328. 15 This is information from Europol, page 328, 16 29 November, if you look at the comments four lines up 17 from the bottom, you see where it says, "Switzerland 18 state this is the fourth death involving people in this 19 case". That is something that Switzerland is saying, 20 isn't it? 21 A. Yes, and when I spoke to the Swiss authorities, that is 22 when Mr Lewis informed me that he was aware of three 23 deaths from the Russian Untouchable website. 24 MS HILL: Pause there, please. 25 Sir I do have a few more topics of questions,</p> <p style="text-align: center;">Page 147</p>
<p>1 in which we felt serious concern." 2 These were discussions I think were they with 3 Mr Micheli around a range of issues, and Mr Micheli is 4 his Swiss lawyer, isn't he? 5 A. One of his lawyers, yes. 6 Q. There was a concern here about a further development to 7 do with some MLA request from Russia and potentially 8 that Mr Perepilichny would be "the culprit". Can you 9 see that? MLA I think is a money laundering -- I am not 10 sure what it is, actually mutual legal assistance, 11 forgive me, of course. I don't do enough extradition 12 work to know that, but yes. 13 This is him talking to his Swiss lawyer isn't it 14 about some other proceedings in part? 15 A. Yes. 16 Q. Just for completeness, officer, I think you have already 17 said this, that you did understand from the Swiss didn't 18 you that if Mr Perepilichny's death was linked with the 19 fraud, or with their investigation, he was the fourth 20 witness in their case to die? Mr Pollard that is what 21 you understood, isn't it? 22 The Swiss -- I am just reading from a notebook here, 23 DC Pollard spoke to the Swiss authorities, Alexander is 24 the fourth witness in their case to die, page 22, 25 volume 5.</p> <p style="text-align: center;">Page 146</p>	<p>1 I don't know if you want to take a small break. I will 2 be as proportionate as I can but I have a few more 3 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 10 learned friend behind me -- sorry, what did I say? 11 Mr Pavlov, forgive me, Mr Pollard. It is a question 12 about Mr Pavlov, sorry. It has been too long a day. 13 You agreed to my learned friend behind me that border 14 checks, such as they were, that you and your 15 investigation carried out did not reveal the fact that 16 Mr Pavlov had left this country the day after 17 Mr Perepilichny's death. That's right, isn't it? 18 A. My inquiry didn't do that, no. 19 Q. At no point did you seek to interview Mr Pavlov at all, 20 did you? 21 A. I answered that on Friday, and no, because there were no 22 grounds to justify interviewing Mr Pavlov because in the 23 absence of there being any evidence of murder, clearly 24 his status could not have been determined as to whether 25 he was a suspect, a witness or actually nothing. So no,</p> <p style="text-align: center;">Page 148</p>

<p>1 I didn't for those reasons.</p> <p>2 THE CORONER: You said left on 11 November. Do you know</p> <p>3 when he arrived?</p> <p>4 MS HILL: I think that is not known, sir.</p> <p>5 A. I don't know when he arrived.</p> <p>6 THE CORONER: Did he come back, do you know?</p> <p>7 A. I don't know if he came back, actually.</p> <p>8 THE CORONER: After 11 November, did he ever come back to</p> <p>9 the UK?</p> <p>10 A. I don't know, sir, because I didn't do those checks.</p> <p>11 That was done by Mr Travers following the request.</p> <p>12 THE CORONER: All right.</p> <p>13 MS HILL: Do you know that in The Times on 23 May last year</p> <p>14 Mr Pavlov indicated that he was willing to be</p> <p>15 interviewed by British police but had never been invited</p> <p>16 to do so?</p> <p>17 A. What was the date, sorry.</p> <p>18 Q. Did you know in the course of this Inquest -- it came up</p> <p>19 at one of the pre-inquest reviews, which I think you</p> <p>20 have been attending -- that Mr Pavlov told journalists</p> <p>21 in The Times on 23 May last year that he was willing to</p> <p>22 travel to Britain to be interviewed by police but had</p> <p>23 never been invited to do so. Did you know about that?</p> <p>24 A. Not off the top of my head, no.</p> <p>25 Q. Even now, having seen the Skype material, that appears</p> <p style="text-align: center;">Page 149</p>	<p>1 some of your officers had had with Hermitage on</p> <p>2 6 December. That is right, isn't it?</p> <p>3 A. Yes, it is.</p> <p>4 Q. For the learned coroner's note, Officer Dando's report</p> <p>5 is at page 188 of volume 1, Officer Drinkwater's report</p> <p>6 or notebook is at page 212 of volume 2. The second of</p> <p>7 those made clear that the dossier had been discussed in the</p> <p>8 6 December meeting, and was then referred to in the</p> <p>9 18 December letter. If you look, please, over the page,</p> <p>10 on 165, it says this --</p> <p>11 A. Sorry, right. I was asked to look at page 308.</p> <p>12 Q. Look on the second page of this letter, I have different</p> <p>13 numbering from a different bundle. Look on the second</p> <p>14 page of the letter.</p> <p>15 A. It is the letter dated 18 December.</p> <p>16 Q. Second page and the heading "Threats to</p> <p>17 Mr Perepilichnyy".</p> <p>18 A. Yes.</p> <p>19 Q. "As we explained to you during our meeting, around</p> <p>20 November 2011 Mr Perepilichnyy informed our client about</p> <p>21 the existence of this dossier, his name on a so-called</p> <p>22 hit list."</p> <p>23 Do you see that?</p> <p>24 A. Yes.</p> <p>25 Q. Then:</p> <p style="text-align: center;">Page 151</p>
<p>1 to suggest his communications with Mr Perepilichnyy, you</p> <p>2 have made no further attempts to speak to Mr Pavlov, is</p> <p>3 that right?</p> <p>4 A. There is no reason to speak to -- I have no reason to</p> <p>5 speak to Mr Pavlov.</p> <p>6 Q. As far as the dossier is concerned, this was information</p> <p>7 that featured in the material that Hermitage provided to</p> <p>8 your investigation, wasn't it?</p> <p>9 A. Well the commentary was, I wasn't aware of -- there no</p> <p>10 dossier. Just a comment that Mr Perepilichnyy had made</p> <p>11 to them in November 2011.</p> <p>12 Q. The suggestion was that the name of Mr Perepilichnyy had</p> <p>13 featured on this dossier that had been found in the</p> <p>14 custody of Mr Lurakhmaev, that is what you understood,</p> <p>15 isn't it?</p> <p>16 A. Not in 2012, no. Not from Hermitage's correspondence,</p> <p>17 no.</p> <p>18 Q. Do you want to look briefly at what Hermitage told you</p> <p>19 about this, please. If you find the evidence of their</p> <p>20 letters to you, bear with me a second, you will see this</p> <p>21 in the 27 November letter. It is volume 1, page 300 --</p> <p>22 in fact forgive me, it is the 18 December letter but</p> <p>23 I think it is in the same folder, volume 1, page 307.</p> <p>24 Volume 1, page 307 is the 18 December letter.</p> <p>25 This followed on, didn't it, from a meeting that</p> <p style="text-align: center;">Page 150</p>	<p>1 "Further information was given about that in the</p> <p>2 letter."</p> <p>3 There are press reports that refer to this</p> <p>4 particular dossier but is this right, that you did not</p> <p>5 make attempts to obtain that in any international way?</p> <p>6 A. Not at that time for two reasons.</p> <p>7 Again, I, Mr Perepilichnyy informed Hermitage that</p> <p>8 he was of the opinion it was an extortion attempt and</p> <p>9 never raised the matter after that. It was a year</p> <p>10 previous to his death.</p> <p>11 And, again, had there been any evidence of murder,</p> <p>12 identified from the detailed tests, then this, like</p> <p>13 a number of other matters, would have fallen under</p> <p>14 further review and may have identified a line of inquiry</p> <p>15 had there been any evidence of murder, but not at that</p> <p>16 time, at that stage, there was -- I did not pursue that</p> <p>17 for those reasons.</p> <p>18 Q. You know though don't you that those sort of</p> <p>19 international requests if they are made do take</p> <p>20 a certain period of time to be complied with, don't you?</p> <p>21 That is your own experience, isn't it?</p> <p>22 A. They can do, yes.</p> <p>23 Q. The net result of where we are on this evidence is that</p> <p>24 unless Mr Suter can perhaps perform some magic in the</p> <p>25 next few days, we don't know whether this coroner will</p> <p style="text-align: center;">Page 152</p>

<p>1 have the response to the request that the coroner made 2 for that dossier. Do you understand that? 3 A. If the request has been made, then yes. 4 Q. You were aware as well weren't you from newspaper 5 reports that were drawn to your attention that some 6 press reports referred to documentation from Russian 7 cases or a Russian case, where Mr Perepilichny's 8 lawyers had described him as being at risk. You knew 9 about that from press reporting, did you? 10 A. Not -- I can't recall, there was so many press reports, 11 I didn't read all of them at the time, I was merely 12 focusing on the inquiries that were conducted rather 13 than media reports. 14 Q. Turn over the next page of Hermitage's letter, please, 15 where they refer in italics on the third page of this 16 letter to court documents from a Moscow case that 17 describe Mr Perepilichny as living outside the Russian 18 Federation because he fears for his life. These were 19 reports in the Independent newspaper, I think there are 20 separately reports on the BBC saying that they had seen 21 those court documents. 22 It follows I think doesn't it that that was not 23 information you sought to obtain from the Moscow courts. 24 That's right, isn't it? 25 A. Not at that stage, no.</p> <p style="text-align: center;">Page 153</p>	<p>1 a Moscow case last year. I just want to know, is this 2 Mr Pavlov saying in a court document? 3 MS HILL: Let me pull out the letter. 4 THE CORONER: It is the bit you just showed me. When you go 5 to 309, there was just a bit in italics, third paragraph 6 down which you ... 7 MS HILL: The italics that refer to the court documents -- 8 THE CORONER: I am just trying to -- is it Mr Pavlov says in 9 a court document? 10 A. I think it is a journalist, isn't it? 11 MS HILL: I think there are two different press reports 12 about this -- 13 THE CORONER: Yes. 14 MS HILL: -- and in one of them Mr Perepilichny's lawyer 15 says this. It may be the second of the two, The 16 Telegraph one. 17 It is quoted in a court document from his lawyer, is 18 my understanding of it. We have the original article, 19 sir, if you want to look at them if that helps you put 20 them into a broader context, because in fact if you look 21 at the timeline we have just handed up to you. The 22 documents in question are in volume 1 of my learned 23 friend for the insurer's bundle, because one can see, if 24 you look at the very end of the timeline, page 113 of 25 the volume 1 is the BBC report of this. Page 92 of</p> <p style="text-align: center;">Page 155</p>
<p>1 Q. Well not at any stage. You didn't follow up that line 2 of inquiry, did you? 3 A. No, I didn't. Because there was no evidence that he was 4 murdered. 5 Q. You didn't liaise with your Russian counterparts to find 6 out anything about the \$3 million dispute that 7 Mr Perepilichny had with Mr Kovtun, did you? 8 A. No, not at that stage for the reasons I have previously 9 given. 10 Q. I would like to ask you some questions now about the 11 totality of the evidence that I suggest was in fact 12 before you of threats to Mr Perepilichny, danger and 13 concerns over his safety. I have a very short timeline, 14 I would just ask you to look at which we have copies of 15 for everybody else with the references on, which may 16 help in following the questions to you. 17 Mr Pollard, what we have done on this short document 18 is try to put into some kind of order as a ready 19 reckoner the evidence in chronological order that we 20 suggest was in fact before Surrey Police. 21 THE CORONER: Sorry, I am just looking -- I am still on 309. 22 MS HILL: Forgive me, sir, let me go back to that. 23 THE CORONER: All right. 24 MS HILL: What is the issue that I can assist -- 25 THE CORONER: No, no, just that the court documents from</p> <p style="text-align: center;">Page 154</p>	<p>1 volume 1 is the Daily Telegraph article. 2 I think where it lands, if I understand it 3 correctly, is the Independent report that court 4 documents refer to Mr Perepilichny living outside the 5 Federation because he fears for his life. 6 There is also then the BBC report of a similar 7 things that quotes a document from a Moscow court, that 8 is the one I just took you to at 112 of volume 1. 9 And there is a Telegraph article at page 92 of 10 volume 1. 11 I think I am probably confusing you, sir. 12 THE CORONER: No, it is just these things one just has to 13 get to the start of them otherwise one is at risk of 14 just recycling but I have it, so 112 -- give me the 15 other ones. 16 MS HILL: 92. 17 THE CORONER: "The BBC ..." 18 MS HILL: The BBC are at 112. 19 THE CORONER: "... has seen a document from a Moscow court 20 in which a spokesman ..." 21 Right, that is that one. 22 You very kindly gave me another reference, where was 23 the other one? 24 MS HILL: 92 is the Telegraph article. Which again quotes 25 public records that refer to Mr Perepilichny's legal</p> <p style="text-align: center;">Page 156</p>

1 representative saying in court that he was living
 2 outside the Federation because he fears for his life.
 3 Then the Independent article that is referenced in
 4 this letter in italics seems to be a report of the same
 5 thing. I think if you turn over page, sir, you will see
 6 the Independent article itself in full, certainly in one
 7 of the versions of this letter, I don't know if you will
 8 find it in volume 1, if you find at page 311 the
 9 Independent article itself. Do you see that at the
 10 bottom of 311, court documents?
 11 THE CORONER: Yes.
 12 MS HILL: Sir, my understanding is there are two sources
 13 where it is said that the source in the court document
 14 is Mr Perepilichny's lawyer, but the Independent
 15 doesn't quite make that clear. Does that help you?
 16 THE CORONER: Yes, no, I am ...
 17 Do we know what the public record is that is
 18 referred to at page 92?
 19 MS HILL: I don't think we do. I mean I am assuming it is
 20 some kind of court record but I don't think we know any
 21 more than that. I think this witness's evidence is that
 22 his investigation didn't uncover it.
 23 THE CORONER: Yes.
 24 MS HILL: And the previous coroner has declined to order any
 25 turning over of --

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1 THE CORONER: If it is a public record, it ought to be
 2 easily -- that what Mr Parfitt, I don't know him but
 3 that is what he says.
 4 MS HILL: Yes.
 5 THE CORONER: If it is a public record that he is referring
 6 to, I suppose there can't be anything sensitive about
 7 it?
 8 MS HILL: I assume not, but it is not something that is
 9 before you at the moment.
 10 THE CORONER: No.
 11 Just give me a minute. (Pause)
 12 Yes, thank you so much. We are on to this?
 13 MS HILL: Yes, we are.
 14 THE CORONER: Thank you.
 15 MS HILL: Mr Pollard, this document is an attempt to just
 16 put together in one place the evidence that I suggest
 17 was before Surrey Police about threats to
 18 Mr Perepilichny, or concerns over his life. I suggest
 19 to you, having heard, Mr Pollard, your evidence, in
 20 particular on Friday, that when each and every one of
 21 these issues is put to you, what you are trying to do is
 22 minimise the evidence of threats or fear. Do you
 23 understand that is what I am suggesting to you?
 24 **A. That is what you are suggesting but that is not what**
 25 **I did, no.**

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1 Q. That on each and every occasion when there is some
 2 evidence of threats or fear, you appear very willing to
 3 accept an alternative interpretation. Do you understand
 4 that that is what I am suggesting to you?
 5 **A. Well I don't speculate on those, or -- or put them in,**
 6 **you know sometimes it is difficult to put them into the**
 7 **context of what they said or what they mean. So that is**
 8 **my interpretation of those, given the context in which**
 9 **they were, we were not able to explore them further, and**
 10 **looking at the totality of the investigation is how**
 11 **I reach my conclusions.**
 12 Q. For some reason, it is my suggestion to you that your
 13 interpretation of these individual items is always to
 14 minimise the fear or the threat that they suggest. Do
 15 you understand?
 16 **A. I understand what you are saying but no, that is not the**
 17 **case.**
 18 Q. Taking the first two then briefly if I may, Mr Gherson
 19 on 16 or 18 November 2012 called Surrey Police and made
 20 it clear that he was concerned that Mr Perepilichny had
 21 been concerned about his safety in recent weeks and
 22 followed it up a few days later with a call to the
 23 effect that Mrs Perepilichnaya was very distressed and
 24 worried about other incidents and had told Mr Gherson
 25 that some people said to her that they knew where she

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1 and the kids lived.
 2 In response to that on Friday, pages 91 to 92 of the
 3 transcript you said this, that Mr Gherson, when he was
 4 asked again about this, said he had no information to
 5 assist.
 6 What that reflects is that when Mr Gherson was
 7 pressed for more information he said "Look, there is
 8 a client confidentiality issue here", that is what
 9 became the issue or a client consent issue, but what he
 10 had provided to you before that was evidence of concern,
 11 wasn't it?
 12 **A. Well, if he was that concerned, surely he would have**
 13 **waived his client's privilege but he wrote into Surrey**
 14 **Police and said that he is not able to or has no**
 15 **information to give to my Inquiry that can be of any**
 16 **assistance. Now if someone is that concerned about**
 17 **someone, privilege or not, I would have expected them to**
 18 **waived that and told my officers exactly what the nature**
 19 **of those threats were and not hide behind client**
 20 **confidentiality.**
 21 THE CORONER: Hang on, what did he actually say in that, in
 22 that is there a mention of privilege or is he simply
 23 saying he hasn't got anything that will assist you?
 24 **A. The main thrust of it is he had nothing to assist my**
 25 **inquiry.**

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1 THE CORONER: What is the date of that?
 2 **A. Unfortunately they have not put that in here but it is**
 3 **in one of documents sent to me which was able to inform**
 4 **my decision, but obviously Ms Hill's team has not put**
 5 **what Mr Gherson's response was when my officers went to**
 6 **see him and his subsequent email.**
 7 MS HILL: You can see if it helps you, sir, in volume 5,
 8 page 6, the email from Mr Gherson himself.
 9 THE CORONER: Hold on. Yes.
 10 Do you have that?
 11 **A. I am just having a look, sir.**
 12 THE CORONER: Thank you, Ms Hill. I have that.
 13 MS HILL: On volume 5, page 6, just briefly Mr Gherson
 14 emailed Mr Dando confirming he had telephoned on the
 15 16th, do you see that, and that he had asked to ensure
 16 that detailed toxicology tests were conducted.
 17 THE CORONER: Do you have that Mr Pollard? Are you all
 18 right? We both have it, page 6, yes.
 19 **A. Page 6, yes.**
 20 MS HILL: Then he explains in the remainder of the email
 21 what his limited mandate was, the foot of page 6 says
 22 that:
 23 "I have a limited mandate given to me at the time of
 24 Mr Perepilichny's death to communicate on behalf of
 25 Mrs Perepilichnaya the need for detailed toxicology

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1 tests."
 2 THE CORONER: Yes.
 3 MS HILL: That was the basis on which he was unable to go
 4 any further than what he had initially said, do you see
 5 that?
 6 **A. Which paragraph is that, sorry?**
 7 Q. The very end of page 6 of volume 5 he explained that he
 8 perceived there were issues about his mandate and his
 9 instructions?
 10 **A. All right, yes, in relation to the -- yes.**
 11 Q. He had nevertheless made clear in the call, that he says
 12 is on the 16th, that he felt detailed toxicology tests
 13 should be carried out. That is clear, isn't it?
 14 **A. Yes.**
 15 Q. The learned coroner has already looked at this, I don't
 16 want to trouble him too much with it, but the police log
 17 at 374, I will just read it out, page 374 I think of
 18 volume 2, he had said in the call:
 19 "He was a family lawyer acting on behalf of the
 20 deceased widow, wished to share the deceased had been
 21 involved in a large-scale fraud. The deceased was
 22 a witness in these matters. There had been several
 23 proceedings and banning orders, and as a result of these
 24 issues the deceased is alleged to have been concerned
 25 regarding his safety in recent weeks. He therefore felt

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1 that toxicology work was appropriate."
 2 He called again a few days later saying, as is
 3 recorded on that short timeline, that:
 4 "Mrs Perepilichnaya was very distressed and worried
 5 about other incidents, had told Mr Gherson that some
 6 people had said they knew where she and the kids lived."
 7 What I am suggesting to you, Mr Pollard, is that
 8 that was clearly significant information coming from
 9 Mrs Perepilichnaya's lawyer about the deceased having
 10 concerns about his safety in recent weeks. Do you see
 11 that?
 12 **A. Yes, which is why we went to go and see him, but what**
 13 **was disappointing was that he says in the last sentence**
 14 **of that last paragraph, on page 7, that:**
 15 **"I continue to believe that I have no meaningful or**
 16 **relevant information to help you in any event. Though**
 17 **I accept that this is something you may wish to satisfy**
 18 **yourself."**
 19 **So that is what he said.**
 20 THE CORONER: That is what you mean by ...
 21 MS HILL: Putting aside though what more he might have been
 22 able to say, what he actually did say to you was
 23 a concern, wasn't it, that the deceased had been
 24 concerned about his safety and that Mrs Perepilichnaya
 25 was now concerned about people knowing where she and the

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1 children lived.
 2 Even if you were frustrated that he wouldn't tell
 3 you more, what he did tell you should have alerted you
 4 to a concern, shouldn't it?
 5 **A. That is why we went to go and see him but why he then**
 6 **didn't feel that he could tell us more about those,**
 7 **perhaps because he didn't know anything. I mean it is**
 8 **quite clear there what he says, it is his own writing in**
 9 **an email that he has sent, that he has said:**
 10 **"I continue to believe that I have no meaningful or**
 11 **relevant information to help you in any event."**
 12 **Now there is not a lot I can do about that.**
 13 Q. You are focusing aren't you with respect, Mr Pollard, on
 14 what he didn't tell you rather than what he did tell
 15 you. What I am suggesting to you is that you are
 16 minimising the significance of what he did tell you,
 17 which is that the deceased and his widow were concerned
 18 for their safety. You didn't do anything further to try
 19 and action that, did you?
 20 **A. Well we did because we went to go and see Mr Gherson and**
 21 **that is what he told us. We tried to speak to**
 22 **Mrs Perepilichnaya more, she didn't tell us that -- or**
 23 **she didn't elaborate any further with us.**
 24 **So, you know, I am afraid there is not an awful lot**
 25 **I can do when I am given information like that with**

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<p>1 people that are not willing to help me.</p> <p>2 Q. All right, moving down the timeline if I may --</p> <p>3 THE CORONER: The answer is you did go back to him, yes?</p> <p>4 And what he said to you was this is what he said, not</p> <p>5 that he didn't have any more information but he said</p> <p>6 that he believed he had no meaningful or relevant</p> <p>7 information to help you?</p> <p>8 A. Yes.</p> <p>9 THE CORONER: That is what he said to you?</p> <p>10 A. Yes.</p> <p>11 MS HILL: You understand, officer, why I am asking you these</p> <p>12 questions, don't you, because you have repeatedly said</p> <p>13 that there is no evidence that he was, Mr Perepilichnyy,</p> <p>14 was threatened or in danger or in fear during his life.</p> <p>15 I am suggesting to you the content of what Mr Gherson</p> <p>16 did tell you is just the very beginning of a line of</p> <p>17 people telling you that there were in fact threats and</p> <p>18 concerns about him. Do you understand that?</p> <p>19 A. It is the beginning but not the end because they were</p> <p>20 never able to substantiate that.</p> <p>21 Q. Let's look further down, the coroner doesn't need to</p> <p>22 turn it up again but 27 November Hermitage write saying</p> <p>23 we understand Mr Perepilichnyy has received death</p> <p>24 threats.</p> <p>25 29 November Mrs Perepilichnaya is spoken to by the</p> <p style="text-align: center;">Page 165</p>	<p>1 Mrs Perepilichnaya saying that her husband had been</p> <p>2 concerned that she had had contact with the police</p> <p>3 herself in late May 2011. He was concerned that as</p> <p>4 a result of that, their home address would be on the</p> <p>5 police national computer.</p> <p>6 That is what your FLOs have recorded?</p> <p>7 A. Yes.</p> <p>8 Q. Yes, so that is further evidence, is it not of a concern</p> <p>9 about his safety and his security objectively viewed,</p> <p>10 isn't it?</p> <p>11 A. Again, as I explained, we are -- you know, I wanted to</p> <p>12 explore that with the -- through the FLOs but</p> <p>13 Mrs Perepilichnaya was not forthcoming with putting the</p> <p>14 context around that at the time.</p> <p>15 The voicemail was post the death, and when she was</p> <p>16 asked about that she explained that it sounded like</p> <p>17 a judicial matter not a threat and that the voice was</p> <p>18 quite polite.</p> <p>19 Q. Yes, again what you are doing here if I may say is</p> <p>20 accepting the minimum interpretation of this. You are</p> <p>21 minimising the evidence of the threats, aren't you?</p> <p>22 A. No, I am not minimising it, I am basing that on what</p> <p>23 I am told by Mrs Perepilichnaya who listened to the</p> <p>24 message and told my officers what it was. I can only go</p> <p>25 by what I am told.</p> <p style="text-align: center;">Page 167</p>
<p>1 FLOs, accompanied by Mr Gherson. She then reports, as</p> <p>2 the FLOs have noted, that she had heard her husband on</p> <p>3 the phone saying there was a concern that people knew</p> <p>4 where they lived, that he was concerned that their</p> <p>5 address was now on the police system, after she had had</p> <p>6 contact with the police herself, and she disclosed the</p> <p>7 voicemail threat on Mr Perepilichnyy's phone.</p> <p>8 The note that Mr Gherson has provided of that call</p> <p>9 records Mrs Perepilichnaya saying:</p> <p>10 "I was the one who was worried and was always</p> <p>11 complaining, he would always say everything was fine but</p> <p>12 not that long ago I heard a conversation, someone is</p> <p>13 trying to pressure him and they know where the children</p> <p>14 are living, they know the address. This what I heard</p> <p>15 him talking to someone about. He was saying it was so</p> <p>16 easy to find out the address after she had had contact</p> <p>17 with the police."</p> <p>18 This is what the FLOs had recorded</p> <p>19 Mrs Perepilichnaya saying.</p> <p>20 A. Not all of that content. This is Gherson's note there,</p> <p>21 doesn't it, that is Gherson's note records TP saying.</p> <p>22 Q. Forgive me, Mr Pollard, the first three points are</p> <p>23 a summary of what your FLOs have said and the Gherson</p> <p>24 note amplifies the middle one of those bullet points,</p> <p>25 because the middle bullet point reflects</p> <p style="text-align: center;">Page 166</p>	<p>1 Q. How closely did you examine the evidence about when the</p> <p>2 Perepilichnyy couple had moved to St George's Hill?</p> <p>3 A. Well they moved there on, in July 2012.</p> <p>4 Q. There is some evidence to that effect but do you know</p> <p>5 that Mrs Perepilichnaya says that you have that wrong?</p> <p>6 A. Well I got that from the inquiry that was made of the</p> <p>7 letting agents.</p> <p>8 Q. Can you turn up, please, volume 5, page 121 and</p> <p>9 page 250.</p> <p>10 Volume 5, page 121 down to 250.</p> <p>11 Do you have that, volume 1, page 121?</p> <p>12 A. Yes.</p> <p>13 Q. This is an extract from an intelligence report,</p> <p>14 isn't it, you see that, it begins at page 120?</p> <p>15 A. Yes.</p> <p>16 Q. This suggests doesn't it at the top of page 121, it is</p> <p>17 not a document, sir, I think we have look at before, you</p> <p>18 have it in redacted form in the hearing bundle but this</p> <p>19 is the unredacted version.</p> <p>20 Page 121 at the top says this, doesn't it:</p> <p>21 "On 26 June 2011 the family had made an application</p> <p>22 for leave to remain."</p> <p>23 It suggests doesn't it underneath, number 4, that at</p> <p>24 that point they were at The Coach House?</p> <p>25 A. Well, the date on here is -- it could be 2012, because</p> <p style="text-align: center;">Page 168</p>

1 **you have got 2-0 then you have got 11-11-2, so it**
 2 **doesn't say "2011", it could be "2012". I don't know**
 3 **why that is written in that fashion.**
 4 Q. Mrs Perepilichnaya has given evidence on this issue that
 5 she remembers being at The Coach House address in
 6 I think it is either July or August 2011 because that is
 7 when her father died and she remembers getting the news
 8 about that, so her evidence would be consistent on this
 9 issue with a move in June 2011. Do you understand
 10 that --
 11 **A. I understand what you are saying --**
 12 Q. Just hear the question out, Mr Pollard. If that is
 13 right and if she is right on that issue, and this date
 14 suggests that they were already in The Coach House
 15 by June 2011, look at the bottom of this page, they had
 16 therefore moved, hadn't they, within three and a half
 17 weeks of Mrs Perepilichnaya's contact with the police
 18 that you see referred to on 31 May 2011 at the bottom of
 19 that note?
 20 **A. If that is the case.**
 21 Q. If that is right?
 22 **A. I base that on the letting agents that let the property**
 23 **out and the date that they let that property was**
 24 **in July 2012 --**
 25 Q. Yes.

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1 **A. -- on their records.**
 2 Q. She is saying that that is wrong and I am suggesting to
 3 you that there is evidence that she might be right on
 4 this issue?
 5 **A. Okay, well she didn't tell us then and that is the basis**
 6 **on which I reached that conclusion, was the letting**
 7 **agents that let them the property.**
 8 Q. Then just look at one other piece of evidence, please,
 9 beginning at page 250, which is a record of the Western
 10 Union payments that Mr Perepilichnyy made to a range of
 11 people. It is quite hard to read but if you look please
 12 at page 250.
 13 **A. Yes.**
 14 Q. What this document is, if I have understood it
 15 correctly, and again it is obtained in your
 16 investigation, officer, so I am sure you are familiar
 17 with the detail of it. My understanding is the page at
 18 250 is a summary of the transaction documents that run
 19 through to page 256, do you understand?
 20 **A. Yes.**
 21 Q. What this seems to suggest, doesn't it, is that if you
 22 look at the bottom of the entries, everything before
 23 8 June 2011, bar one entry, has their old address and
 24 everything after the 15 September date has them at The
 25 Coach House, doesn't it? Do you see that?

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1 **A. Yes.**
 2 Q. That does suggest, doesn't it, that Mr Perepilichnyy was
 3 giving The Coach House address regularly to Western
 4 Union from 15 September 2011. For some reason, for one
 5 of those entries he gives his old address but every
 6 other entry, 15 September there are two payments,
 7 7 November, 28th, 6 December, 27 December, 9 January,
 8 4 October, 13 October, he always gives The Coach House
 9 address. That suggests doesn't it, gives further weight
 10 to Mrs Perepilichnaya's evidence that she is right that
 11 they moved in the summer of 2011?
 12 **A. That would appear to be the case. I hadn't seen those**
 13 **dates. Yes, acknowledged those dates. If that is**
 14 **correct, yes.**
 15 Q. This is what your financial investor obtained so --
 16 **A. I know that, yes.**
 17 Q. If that is correct, and in fact D48 does stand for the
 18 proposition that they moved at some point between 31 May
 19 and 26 June, then that does give support to the
 20 proposition that in fact Mr Perepilichnyy was concerned
 21 that his address would now be on the police national
 22 computer as a result of his wife's actions, doesn't it?
 23 **A. That would give support to that, if that is correct,**
 24 **yes.**
 25 THE CORONER: Ms Hill, can you help me before we leave 250.

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1 The last Virginia Water date is what?
 2 MS HILL: It looks from our reading of it, sir, that the
 3 last clear Virginia Water entry is 21 December 2011, it
 4 is the fifth one down, but that in the midst of a whole
 5 range of Coach House addresses.
 6 THE CORONER: Other than that --
 7 MS HILL: The three bottom ones are 8 June, 23 May and
 8 20 May, so I have drawn a line over the bottom three.
 9 THE CORONER: Yes, just give me a minute.
 10 MS HILL: It is that evidence, sir, taken with the
 11 unredacted D48 at page 121 that suggests they had in
 12 fact moved by 26 June. Because if you look at 121, it
 13 is a bit clumsily written but if that date is correct,
 14 26 June they were in The Coach House by that date and
 15 then Ms Perepilichnaya's father dies I will be corrected
 16 but I think it is July or August, isn't it?
 17 It is August.
 18 Mr Pollard, it appears that that sort of analysis of
 19 the Western Union addresses and so on you are doing now
 20 for the first time, looking at it in that way, aren't
 21 you?
 22 **A. Well in terms of -- I am familiar with the content but**
 23 **the dates, I hadn't appreciated those dates in that**
 24 **left-hand column but I had seen the -- this before.**
 25 Q. Just looking briefly if I may further down the timeline,

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<p>1 the short timeline we have just given you, you were 2 aware on 29 November that the Swiss had been in touch, 3 as we know, about Mr Perepilichny being one of the main 4 targets or witnesses in connection with their case. 5 Then on 30 November Mrs Perepilichnaya drew your 6 attention to the voicemail, "Alexander, you did not do 7 what you promised you would do". 8 In relation to that, you explain that away don't you 9 by saying well she later told me this was a polite thing 10 and a judicial thing so I didn't take it any further. 11 Is that right? 12 A. That what she told my officers, yes. 13 Q. Your evidence on Friday, page 105 of the transcript, was 14 that you essentially accepted that. Is that right? 15 A. Yes. 16 Q. Again, you are accepting one interpretation of that 17 threat but not applying an open mind and an objective 18 view, I would suggest to you. 19 A. No, that is not the case. 20 Q. 30 November, you were aware of the text message dated 21 6 November, "Alexander, you will go to prison" and there 22 is reference to 300,000 roubles. Again, on Friday you 23 said that you didn't have concern about that because he 24 carried on conducting himself in a normal way. Is that 25 right?</p> <p style="text-align: center;">Page 173</p>	<p>1 you that you had evidence about Mr Perepilichny's own 2 behaviour that was worth consideration. Just see if we 3 agree on this: he had at least two telephones, is that 4 right? 5 A. Yes. 6 Q. He had multiple email accounts? 7 A. Three or four didn't he? Yes. 8 Q. Various other ways of communicating through Skype, 9 Whatsapp, Viber and things of that nature? 10 A. Yes. 11 Q. He had at least two passports? 12 A. Yes. 13 Q. Look back, please, at D48, page 120, volume 5. 14 A. Yes. 15 Q. Back in the intelligence report at page 120? 16 A. Hmm. 17 Q. Just bear with me a second while I find the correct part 18 of this document for you. 19 There is part of this document that gives three 20 different dates of birth for Mr Perepilichny -- 21 THE CORONER: Sorry, we are in volume 5. 22 MS HILL: It is volume 5, it is the document that begins at 23 page 122, bear with me a second. 24 I am just trying to find the relevant part, just 25 bear with me, sir.</p> <p style="text-align: center;">Page 175</p>
<p>1 A. That was one message in June 2011. 2 Q. Yes. 3 There is then reference to the 5 December meeting 4 where again Mrs Perepilichnaya was recorded to say that 5 the issue about the second phone might have been because 6 of the threats her husband faced and, again, talked 7 about concerns of a similar nature to what had been said 8 before? 9 A. I think her concerns there were more around the 10 Hermitage as opposed to anything else, is my reading of 11 that report. 12 Q. Well your FLOs will give evidence about that, and the 13 coroner has their records -- 14 A. That's right. 15 Q. -- but we have taken a note from page 420 of what was 16 said at that meeting. 17 There are then, as you have seen, the press articles 18 referring to the suggestion he was living abroad because 19 of his fears for his life, and meetings with Hermitage 20 on the 6th. The Swiss information about the airport 21 meeting, the Swiss information about the date to 22 Mr Stepanov, the 18 December letter from Hermitage about 23 the dossier and then the messages that we have taken you 24 to already from the Skype messages. 25 In addition to all of that material, I suggest to</p> <p style="text-align: center;">Page 174</p>	<p>1 I may need to find it in the hearing bundle. 2 THE CORONER: There is a different one on 122 from 124. 3 MS HILL: There is a particular reference where there are 4 three different dates of birth together. Just bear with 5 me a second. I will come back to that reference 6 separately if I may. 7 You had airport data I think, though, didn't you, 8 Mr Pollard to suggest that Mr Perepilichny had not been 9 back to Russia since he left Russia in 2009/2010? 10 A. Yes, but certainly the flight patterns showed him 11 moving -- he still travelled around, went to the 12 Ukraine, Czechoslovakia and places like that, so it was 13 not that he didn't travel but -- and some of the 14 correspondence with his colleague in 2011 suggested that 15 he had been to Smolensk in Russia, so ... 16 Q. But the flight data that you had suggested he had not 17 been back to Russia at all, which would be consistent, 18 wouldn't it, with him being fearful about him returning 19 to Russia? 20 A. Not really because the flight data does have some 21 missing data and of course he did travel to Ukraine 22 a lot, which is on the border so it is not categoric 23 that he never went to Russia and in fact the Skype 24 messages of 2011 do tend to suggest that he went to 25 Smolensk, so --</p> <p style="text-align: center;">Page 176</p>

<p>1 THE CORONER: Only because I have not got it in front of me 2 I will look at it in a moment, but the flight data is 3 that only as it were from flights direct from this 4 country or -- 5 A. No, the timeline, sir, we did six months' worth of 6 flight travel. So started in May, so it shows when he 7 has flown out of Heathrow to Ukraine, Ukraine back to 8 Heathrow and then there are some gaps I think in May and 9 gaps in July where he has gone out -- 10 MS HILL: We can give the reference to the documents, sir. 11 THE CORONER: If he goes to Ukraine to Russia is that going 12 to be -- 13 A. No, I wouldn't have that data, no. 14 I think there was only one misspelling of the date 15 of birth on the document at page 122, I think it said 16 15 July 1968 but all the other dates of birth appear to 17 be 25 July 1968. So it is obviously a typo from 18 Mr Perepilichny's date of birth. 19 MS HILL: Can I ask you to look instead, just dealing with 20 the multiple dates of birth point. I have now found the 21 reference I wanted to ask you about. If you look in the 22 miscellaneous bundle, please, at page 67. 23 THE CORONER: What does it look like? Is it a policy -- 24 A. It is an intelligence log. 25 MS HILL: It looks to be an intelligence report again. If</p> <p style="text-align: center;">Page 177</p>	<p>1 Moscow since 30 November 2009, is that not right, 2 Mr Pollard? 3 A. On that flight data, but as I say the more recent data 4 we did for six months' worth of travel, he did 5 nevertheless travel to Estonia, Czechoslovakia, Ukraine. 6 MS HILL: It is a different point, with respect, Mr Pollard. 7 You are saying, well, look, he travelled to all these 8 difference countries but I am saying to you -- 9 A. Not in that time period, no, there was no other flight 10 to Russia. No, I accept that, yes. 11 Q. Between the end of 2009 and his death? 12 A. If that is what the data says then yes that is right. 13 THE CORONER: Can you help me about the dates of birth. 14 There is an inquiry made, is this right, from 15 looking at this, an inquiry made of the Border Agency? 16 If you go to page 66, it looks as if it is a response 17 from them. If you go then to page 67, do you see (1): 18 "Inquiry in re ..." 19 Do you see his details and then those three dates of 20 birth. Do you have that on 67? 21 A. Yes, sir, yes. 22 THE CORONER: Does that mean that the inquiry that is made 23 of the Border Agency included those three dates, do you 24 see what I mean? 25 A. I do and again -- so this is, but what is not clear is</p> <p style="text-align: center;">Page 179</p>
<p>1 you look at the top of page 67, does it not give on the 2 face of it three different dates of birth for 3 Mr Perepilichny? 4 A. On that document, yes. 5 Q. 15 July, 5 July and 18 July? 6 A. Yes. 7 Q. That is not a typical occurrence is it for someone to 8 have multiple dates of birth, that is something that 9 might suggest someone was travelling under different 10 passports and is trying to avoid being detected as to 11 where they are, isn't it? 12 A. Well not necessarily but I mean I don't know why he 13 would have given three different dates of birth but 14 whether he did or whether -- I don't know. 15 THE CORONER: Just a minute. 16 MS HILL: Sir, you wanted a reference for the flight 17 information. That is at bundle 5, page 224 through to 18 226. If you wanted the flight information. 19 THE CORONER: Thank you. Just a minute. Just a minute. 20 (Pause) 21 MS HILL: That runs from 29 September 2009 through to 22 3 November 2012. I can't see an entry for SVO, that is 23 the airport in Moscow, apart from the first few entries 24 towards the end of 2009. Do you see that? 25 From this data he doesn't appear to have gone to</p> <p style="text-align: center;">Page 178</p>	<p>1 where they have got those dates from. 2 THE CORONER: That is what I am asking. Has the inquiry 3 gone in with his name and those as three possible dates 4 of birth? Do you see what I mean? 5 A. Yes, as opposed to him giving those. 6 THE CORONER: As opposed to him giving them or the Border 7 Agency giving it. Do you see what I mean? 8 A. Yes. 9 THE CORONER: Will there have been -- will this have been 10 prompted by a request from Surrey for the answer? 11 I imagine it would be. 12 A. It would have been, yes, so that may have been where we 13 got -- I am not sure if we had a copy of his passport at 14 that time or not, but that may have been where we may 15 have got that information from if it was not clear on 16 his exact date of birth, which is why those variations 17 were given to search on. Because it is dated 18 18 December, this report. 19 MS HILL: Those date of births must have come from 20 somewhere. 21 A. Yes, no, I agree they would have done, but I don't know 22 where. 23 MS HILL: I think in fairness, sir, I have now established 24 that that page of D48 is missing from the other version 25 of D48 that we looked at.</p> <p style="text-align: center;">Page 180</p>

<p>1 Sir, that is one one needs to look at the redacted 2 version in the miscellaneous bundle. 3 You have established already that he gave 4 a different address at the Bristol hotel and when you 5 interviewed the female person he had been with in Paris 6 by email, forgive me another female person he had been 7 with, not the person in Paris, she described him for 8 your reference, volume 5, page 553, as a very closed 9 person. Do you remember that part of the evidence? If 10 you want to look it up -- 11 A. Which? 12 Q. It is volume 5, we can just do two short points in here 13 if I may, volume 5, page 553, that the person whose name 14 is at 552 was spoken to by your officers. 15 A. I need bundle 4 ... thanks. 16 Q. It is a handwritten note, an extract from an officer's 17 notebook, 552 is the name of the female who is 18 interviewed. The coroner can read the interview but 19 over the page she says in the middle of number 19 of the 20 internal numbering at the bottom: 21 "He said he never went out, had no friends." 22 Do you see that? 23 A. Yes. 24 Q. Over the page on page 20: 25 "He was a very closed person."</p> <p style="text-align: center;">Page 181</p>	<p>1 a way that did not give a pattern to his behaviour that 2 an assassin could follow? Do you remember that part of 3 your witness evidence -- forgive me, it's part of your 4 report, paragraph 15.2 of your report. 5 A. Okay, yes. Well I haven't got it but ... 6 Q. Take it from me, in your report for the learned 7 coroner's note, page 588 of volume 2, you said that you 8 didn't believe that Mr Perepilichny's behaviour was to 9 a set pattern that an assassin could follow. Do you 10 want to turn it up? 11 A. I've got bundle 5, volume 2, it is not at 588. 12 Q. If you want to look at your own report, it is in 13 volume 2. 14 A. Oh right, okay. 15 Q. Do you take it from me that that is part of your report? 16 A. Okay. 17 Q. That you have said that you didn't believe he was 18 displaying a pattern of behaviour that an assassin could 19 follow, because he was travelling to different countries 20 at different times and so on? 21 A. He was in -- yes, he did do extensive travel, yes. 22 Q. Yes, but doesn't the flipside also work? That because 23 he was not living to a regular pattern, he was not going 24 to the same office every day, things like that, that 25 that is exactly the sort of behaviour someone might</p> <p style="text-align: center;">Page 183</p>
<p>1 Do you see that? 2 A. Yes. 3 Q. While you are in this document, if you go back, please, 4 to page 528, I don't know if you can help with this or 5 not but another officer's notebook at 528 appears to 6 show, if one looks about five lines down on page 528. 7 THE CORONER: 528? 8 MS HILL: 528 is another officer's notebook that appears to 9 reflect Mr Pollard's, top of page 528 some "Telecom 10 research", do you see that heading? 11 A. Yes. 12 Q. A bit hard to read, I think this is Ms Leadbetter's 13 notebook, text message: 14 "Hello Alexander ..." 15 And then this line about five lines down: 16 "Google search link to Waiting For Death website, 17 art designs or tattoos?" 18 Do you see that? 19 A. Yes. 20 Q. Do you know what that website was? 21 A. No. 22 Q. Did anybody look into that or flag that with you? 23 A. No. 24 Q. You have said in your witness evidence that 25 Mr Perepilichny was moving around and travelling in</p> <p style="text-align: center;">Page 182</p>	<p>1 evidence if they were trying to not show a pattern of 2 the way they were acting? 3 A. Not really no, because it was part of his business and 4 his lifestyle, so no. 5 Q. You would say would you that there was nothing here 6 an assassin could find because he was not doing the same 7 thing every day? 8 A. Well, I am saying it would be very difficult if you 9 don't know a person's regular movement. 10 Q. Overall, officer, in relation to this evidence of 11 threats as set out on the timeline and in relation to 12 Mr Perepilichny's own behaviour, I am suggesting to 13 that you are accepting at every turn an explanation that 14 does not fit with him having fears or threats to him. 15 Do you see what I am suggesting? 16 A. I see what you are suggesting, yes. 17 Q. Were you actually qualified to assess his behaviour and 18 whether he was acting in a way that evidenced concerns 19 about his safety or not? 20 A. I followed the evidence that was obtained during the 21 inquiry. The overall totality of the evidence, so 22 I mean I don't see anyone is assessed as ascertaining 23 threats but that was my conclusion based on all of those 24 inquiries. 25 Q. Mr Nemtsov, somebody I am sure you were familiar with</p> <p style="text-align: center;">Page 184</p>

46 (Pages 181 to 184)

1 was assassinated outside the Kremlin, was someone who
 2 said he felt safe because he travelled publicly. It
 3 doesn't always follow does it that because someone
 4 travels freely and publicly they think they are safe and
 5 they are safe, do you understand?
 6 **A. That could happen to anyone, couldn't it? So the point**
 7 **I was trying to make is that Mr Perepilichny moved**
 8 **about freely, openly. I think he spent on average about**
 9 **10 days in the UK, so trying to track where he was at**
 10 **any given time would be difficult but equally, of the**
 11 **people that he was in communication with, there would**
 12 **have been ample opportunity for them to have carried it**
 13 **out in a country, in any other country, so yes.**
 14 Q. Your conclusion at the end of your report was that there
 15 is no evidence -- this is what you announced to the
 16 press on 7 June 2013:
 17 "There is no evidence to suggest there was any
 18 third-party involvement in Mr Perepilichny's death."
 19 In your report he you said:
 20 "He has not been administered a poison."
 21 Those are the findings that you reached, aren't
 22 they?
 23 **A. Yes.**
 24 Q. Just pausing there.
 25 Sir, if you want a reference for that, the reference

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1 to what he told the press on 7 June can be extracted
 2 from the Hermitage letter at page 259 of volume 1, but
 3 what you told the press, the public announcement you
 4 made was that there is no evidence to suggest
 5 third-party involvement in his death. That's right,
 6 isn't it?
 7 **A. Yes, that's correct.**
 8 Q. Similarly you concluded your report with the positive
 9 finding that he had not been poisoned?
 10 **A. That's correct, yes.**
 11 Q. In fairness, officer, is this not the more appropriate
 12 approach for an officer conducting an inquiry of your
 13 nature. What you had to establish was whether you had
 14 a reasonable prospect of charging somebody. What you
 15 had to assess was whether you were going to initiate any
 16 criminal proceedings. That is right, isn't it?
 17 **A. No, that is not right to reach that conclusion on that**
 18 **standard of proof.**
 19 **The results of the toxicology tests, that were very**
 20 **detailed, the conclusions of the experts that were**
 21 **reported to me showed there was no evidence that he had**
 22 **been poisoned or murdered. There was no evidence from**
 23 **post mortem he had been attacked, third party restraint**
 24 **or administered anything.**
 25 **So it was based on that conclusion that -- or based**

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1 **on that evidence presented to me that I drew that**
 2 **conclusion. It is nothing to do with the standard of**
 3 **proof required to bring about a prosecution, absolutely**
 4 **nothing to do with that.**
 5 Q. Wouldn't the fairer conclusion have been that there was
 6 evidence of threats, there was evidence of danger but
 7 there was no clear suspect or evidence of a criminal act
 8 for all sorts of reasons?
 9 **A. No.**
 10 Q. And that some of these reasons may have been to do with
 11 the initial failings in the investigation?
 12 **A. No, I don't agree with that.**
 13 Q. Your policy book records -- for the learned coroner's
 14 note, at page 570 and 572 of volume 2 -- that you made
 15 representations to the coroner that he should not
 16 recognise Hermitage as an interested person, didn't you?
 17 **A. No, I was asked for my view on that.**
 18 Q. Your view was that my client should not be included in
 19 the inquest, wasn't it?
 20 **A. Because I didn't think that they met the criteria and**
 21 **also I did question their motives for wanting to be --**
 22 **he asked my view, I gave it, ultimately it is a matter**
 23 **for the coroner as was to make that decision but if I am**
 24 **asked a view, I shall give it.**
 25 Q. You knew full well that Hermitage's position was one of

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1 concern that this man had in fact been the subject of
 2 threats and had in fact been murdered. You were keen to
 3 keep my clients out of the inquest, weren't you?
 4 **A. No, not at all.**
 5 Q. Generally you have been minimising the evidence of
 6 threats throughout your evidence and I would like to ask
 7 you some questions about why that might be.
 8 Are you concerned about consequences for your own
 9 career, officer?
 10 **A. No.**
 11 Q. Are you concerned about the reputation of Surrey Police
 12 here?
 13 **A. No.**
 14 Q. It would be better, wouldn't it, for Surrey Police, if
 15 this was in fact a natural death, because then any of
 16 those failings at the beginning would have had no
 17 consequence?
 18 **A. No, not at all.**
 19 Q. This is a case in which, as your policy document notes,
 20 at page 578/22, "The Government have maintained
 21 an ambient interest in", that is your phrase.
 22 **A. Where is that recorded, sorry?**
 23 Q. If you want to look in your notebook, it is 578/22 of
 24 volume 2, if you want to turn it up.
 25 THE CORONER: Sorry, Ms Hill, say that again?

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<p>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</p> <p style="text-align: center;">Page 189</p>	<p>1 just all started in the same place with a denial. 2 I am just not quite sure how much value that is 3 going to have for me. 4 MS HILL: I will move on, sir. 5 Your position, officer, is that this has been a fair 6 and even-handed investigation, that there are no 7 concerns about protecting Surrey Police's reputation, 8 there has been no political interference. That is the 9 summary, isn't it? 10 A. That is the truth. There has been no interference and 11 as far as I am concerned I conducted a fair and open 12 thorough investigation to establish the facts, and that 13 is my position. 14 Q. Finally, my client is keen to make sure that if there 15 another death of this nature, that the investigations 16 are entirely thorough and clear from the very beginning. 17 Submissions may be made to the learned coroner about 18 a Regulation 28 report, because my client is keen to 19 ensure that if another Russian whistleblower dies and on 20 the face of it has no marks on his body, that the death 21 is nevertheless treated as suspicious from the very 22 beginning. 23 Have you since this death had any greater 24 understanding of the role of poisoning in some of these 25 cases?</p> <p style="text-align: center;">Page 191</p>
<p>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</p> <p style="text-align: center;">Page 190</p>	<p>1 A. Well obviously I have learned stuff, you know from the 2 experts' meeting but I think, you know, any death has to 3 be judged on a case-by-case basis. I don't think you 4 can say that any dead Russian warrants a forensic post 5 mortem and an inquiry; I think you have to look at each 6 case on its merits. 7 Q. Would there be merit in your view in additional training 8 for officers in the fact that some poisons do not 9 evidence an obvious mark or sign on the body? 10 A. Well, no, I wouldn't see that training in that aspect 11 would be relevant. I think if you have got concerns 12 about a death, then those concerns would be raised. 13 They are raised at the time, you would instruct the 14 correct people to assist in identifying what needs to be 15 done and if it was, you know, of a high profile 16 individual, then obviously I would suggest that the 17 tests and process that we took would be undertaken in 18 that case. 19 THE CORONER: It may be, Ms Hill, that that is best looked 20 at when we have had that bit of the evidence, because 21 even in degree it may have moved on over time. 22 MS HILL: Bear with me a second, sir. 23 Nothing further, sir. 24 Thank you. 25</p> <p style="text-align: center;">Page 192</p>

<p>1 Questions from MR BEGGS</p> <p>2 MR BEGGS: Mr Pollard, just going back to the question about</p> <p>3 whether there was any political pressure. You obviously</p> <p>4 cannot speak beyond your own knowledge, so can I just</p> <p>5 confine the question, were you placed under any pressure</p> <p>6 by any police colleagues to come to any particular</p> <p>7 conclusion?</p> <p>8 A. No, sir, I wasn't.</p> <p>9 Q. You were taken, you may recall, to one of Hermitage's</p> <p>10 timelines, this time it is the A3 version, do you</p> <p>11 recall, and you were taken to a number of entries which</p> <p>12 show the deceased discussing rental possibilities. You</p> <p>13 remember that?</p> <p>14 A. Yes, sir.</p> <p>15 Q. At the very top of that same page we also have</p> <p>16 Amanda Doby, from that which we believe to be an estate</p> <p>17 agent, being asked by Alexander re Pinebrook House "Do</p> <p>18 you think we can get better price for Pinebrook?" Do</p> <p>19 you remember that?</p> <p>20 A. Yes.</p> <p>21 Q. Did you find it in any way suspicious that the deceased</p> <p>22 was both looking to consider his rental options whilst</p> <p>23 also considering his purchase options?</p> <p>24 A. No, I didn't, sir.</p> <p>25 Q. You were taken by Mr Moxon Browne to a document which he</p> <p style="text-align: center;">Page 193</p>	<p>1 reading a document with an conspiratorial eye rather</p> <p>2 than a fair and open minded eye, it is hardly surprising</p> <p>3 he didn't have membership of David Lloyd if he had</p> <p>4 membership of a rather more exclusive club --</p> <p>5 THE CORONER: You don't know -- but on the map we were</p> <p>6 looking at, this one, you don't know where that gym is</p> <p>7 do you?</p> <p>8 MR BEGGS: I have tried to work it out, my Lord, from Google</p> <p>9 but I will try and get back to you on that, yes.</p> <p>10 You were also -- Ms Hill just a few moment ago put</p> <p>11 to you the apparently suspicious proposition that the</p> <p>12 deceased had two telephones. Can I ask you this, how</p> <p>13 many senior police officers do you know who have two</p> <p>14 telephones?</p> <p>15 A. Well I have two telephones, sir, and so do a number of</p> <p>16 colleagues.</p> <p>17 Q. Yes. That he had multiple email addresses. How many</p> <p>18 senior police officers do you know that have a job</p> <p>19 email, sometimes two private emails, one for colleagues</p> <p>20 and one for friends and family? Are you familiar with</p> <p>21 that sort of situation?</p> <p>22 A. Yes, that is not uncommon to have more than one email.</p> <p>23 I have more than one email.</p> <p>24 Q. You were also taken at bundle 5, page 552, for the</p> <p>25 learned coroner's note, to an interview with a foreign</p> <p style="text-align: center;">Page 195</p>
<p>1 added to bundle 9, that is the so-called Pollard bundle</p> <p>2 and he gave the pagination of 395. Just to remind you,</p> <p>3 this was the officer's report dated 11 February 2013,</p> <p>4 which contained the revelation that there was no record</p> <p>5 of Mr or Mrs Perepilichnaya at the David Lloyd centre</p> <p>6 which is quite close to St George's Hill, do you</p> <p>7 remember that?</p> <p>8 A. Yes.</p> <p>9 Q. Are you aware that there is within the St George's Hill</p> <p>10 estate a private St George's Hill Lawn Tennis Club, are</p> <p>11 you aware of that?</p> <p>12 A. I can't recall that, to be honest, I don't know.</p> <p>13 Q. As the website of this club reveals, it is an extremely</p> <p>14 exclusive state-of-the-art tennis club which includes</p> <p>15 an exclusive state of the art gymnasium, you didn't know</p> <p>16 that?</p> <p>17 A. I don't recall that, no, sorry.</p> <p>18 Q. Perhaps I would be permitted a mild indulgence at 4.50</p> <p>19 if I observe that it may well be that a gentleman who is</p> <p>20 contemplating renting at £25,000 appear month, we just</p> <p>21 looked at that, might have chosen the more exclusive</p> <p>22 St George's Hill Lawn Tennis Club rather than the David</p> <p>23 Lloyd club that someone like me might go to, do you see?</p> <p>24 A. Yes, I do, yes.</p> <p>25 Q. This would be an example, would it not, of someone</p> <p style="text-align: center;">Page 194</p>	<p>1 lady who made the suggestion that the deceased was</p> <p>2 "a closed person", whatever that might mean. Do you</p> <p>3 recall?</p> <p>4 A. Yes.</p> <p>5 Q. It might be, might it not, that someone would be</p> <p>6 necessarily perhaps more discreet in their conduct if</p> <p>7 they were conducting an affair at the time?</p> <p>8 A. Yes, that would be --</p> <p>9 THE CORONER: I mean it is just not going to -- I don't</p> <p>10 think that is going to help me at all. It depends how</p> <p>11 well somebody knows someone.</p> <p>12 MR BEGGS: There are 101 variables.</p> <p>13 THE CORONER: Yes.</p> <p>14 MR BEGGS: You were also taken to paragraph 15.2 of your</p> <p>15 concluding report and a little bit of it was put to you.</p> <p>16 Can I ask you to turn that up again, please, in</p> <p>17 bundle 9, the Pollard bundle -- forgive the use of the</p> <p>18 surname -- it is at page 122.</p> <p>19 A. Is it the police core bundle?</p> <p>20 Q. It is bundle 9 and some of us have called it the</p> <p>21 "Pollard bundle".</p> <p>22 Or police core bundle I am told, you might have it.</p> <p>23 A. What page number was it?</p> <p>24 Q. 122, mine has red numbers.</p> <p>25 A. Sorry, right, okay. Yes.</p> <p style="text-align: center;">Page 196</p>

<p>1 Q. Can I just check, do you have the penultimate page of 2 your concluding report on 122? 3 A. 122, yes, sorry, yes, I do. 4 Q. If you just home in on paragraph 15.2. 5 A. Yes. 6 Q. Do you recall Ms Hill took you to the sentence saying: 7 "There was never a regular pattern of behaviour in 8 which any would be assassin could follow with any degree 9 of certainty in knowing where he would be at a given 10 time." 11 Do you see that? 12 A. Yes. 13 Q. It was suggested that that of itself might indicate, 14 I think the implication was sort of counter-surveillance 15 moves but if you look at the next sentence have you not 16 made clear that his use of particular services clearly 17 showed he was not seeking to keep a low profile or 18 remain anonymous. Is that right? 19 A. Yes, that's correct. 20 Q. Furthermore you went on to say that his extensive travel 21 didn't indicate, at least to you, that he needed to 22 remain in hiding as a result of any threats. That is 23 the full paragraph, isn't it? 24 A. Yes, it is. 25 Q. Do you recall that one of the members of your team that</p> <p style="text-align: center;">Page 197</p>	<p>1 mobile telephones had any PIN protection, do you recall 2 that? 3 A. Yes. That's correct. 4 Q. Perhaps it is too obvious to state but if one was 5 seeking to lead a furtive or frightened life it might be 6 that one would put the standard four- or six-digit PIN 7 protection on to one's mobiles, but he didn't to that? 8 A. No. 9 Q. You found, as I understand it, no evidence that he was 10 using pay-as-you-go phones? 11 A. No, they appeared to be -- well they were registered to 12 him. 13 Q. And one scarcely need tell this coroner of all coroners 14 that pay-as-you-go phones are sometimes used by people 15 who want to have an anonymous or furtive lifestyle? 16 A. Yes, that's correct. 17 Q. As far as one can tell, neither of his Skype names, one 18 is Alex and the other is not, but none of them made any 19 sophisticated attempt to disguise his true identity? 20 A. No. 21 Q. One of the Gmails on his iPhone was in his own name? 22 A. Yes, it was. 23 Q. The trip to Paris immediately preceding his death was 24 booked in his own name, as were the flights, as were the 25 hotels and so forth?</p> <p style="text-align: center;">Page 199</p>
<p>1 did work on this case was the exotically entitled 2 Ekaterina Clark-O'Connell, if I have that right? 3 A. Yes, that's correct. 4 Q. At bundle 2, I think it is 724, she described the 5 deceased, having done some extensive research of his 6 private emails and so forth as, I quote, "He seemed 7 polite, calm, very clever, educated [and then perhaps 8 only this pejorative] and interested in football". 9 Do you see that? 10 A. Yes. 11 Q. Yes and so yet again we see independent individuals 12 identifying the deceased as being very clever. 13 Did you see anything to in any way conflict with 14 that conclusion? That he was a very educated, very 15 intelligent man? 16 A. No, I didn't, sir. 17 Q. We know from -- I'm sorry to have to navigate between 18 different bundles but from the hearing bundle, page 235, 19 I will just wait for you to get there. 20 The numbering is top right of the page, the one I am 21 looking at anyway. (Pause) 22 A. Right. 23 Q. Do you have it? It is a part of an officer's report. 24 A. Right, I haven't got that, I am on different. 25 Q. Let me save time by saying we know that neither of his</p> <p style="text-align: center;">Page 198</p>	<p>1 A. Yes. 2 Q. If he used a different address, previous address, in the 3 circumstances that would not be surprising, as I think 4 you indicated? 5 A. Say again, sorry? 6 Q. If he used a predecessor address for that Paris trip, 7 given the circumstances you know about, that wouldn't be 8 surprising, would it? 9 A. No, it wouldn't be, sir. 10 Q. You knew that there were at least three members of 11 regularly deployed staff by the Perepilichny household. 12 One was the gardener, do you recall? 13 A. Yes. 14 Q. There was no reason, was there, to have any suspicion 15 about the gardener since he came with the property, he 16 came with The Coach House? 17 A. As I understand, yes. 18 Q. Yes. As far as you could tell, the deceased did not 19 conceal his name from either the driver that he -- the 20 drivers that he regularly used or indeed the cleaner? 21 A. No, he didn't. 22 Q. Nor did he conceal his name from the landlord that he 23 was renting from? 24 A. No. 25 Q. Nor indeed from the St George's Hill estate itself?</p> <p style="text-align: center;">Page 200</p>

50 (Pages 197 to 200)

<p>1 A. No, he didn't.</p> <p>2 Q. There was no security of any description in place by the</p> <p>3 deceased for the welfare of his children, was there?</p> <p>4 A. No -- well, save for a house alarm but that was already</p> <p>5 installed with the property, they didn't install that.</p> <p>6 Q. That came with the property and I think in fact, as it</p> <p>7 happens, Mrs Perepilichnaya did not even know how to use</p> <p>8 it?</p> <p>9 A. That's correct, yes.</p> <p>10 Q. Going back to, because we have seen evidence, it is in</p> <p>11 buried in the documents, that he adored and looked after</p> <p>12 his children very well and there was no indication at</p> <p>13 all that he saw fit to give them any special security</p> <p>14 whatsoever?</p> <p>15 A. No, he didn't.</p> <p>16 Q. You saw no additional security at The Coach House</p> <p>17 itself, did you?</p> <p>18 A. No.</p> <p>19 Q. As far as his regular trips abroad are concerned, which</p> <p>20 you have itemised in, amongst other things, a flight</p> <p>21 schedule. There is no evidence, is there, that he used</p> <p>22 one of the higher grade executive chauffeur companies</p> <p>23 that can provide specialist security?</p> <p>24 A. No, he used the same chauffeur.</p> <p>25 Q. Just we make good that point, none of the drivers he</p> <p style="text-align: center;">Page 201</p>	<p>1 very document which amongst others illustrates this --</p> <p>2 if he is contemplating renting at 25,000 a month,</p> <p>3 £25,000 a month, it is abundantly clear from what you</p> <p>4 saw that he could easily have afforded any of the</p> <p>5 protective measures that I have just taken you through,</p> <p>6 could he not?</p> <p>7 A. Yes, that's correct.</p> <p>8 Q. But there was literally zero evidence of any such</p> <p>9 measures in any aspect of his life?</p> <p>10 A. That's right.</p> <p>11 Q. Contrary to the suggestion that you might have been</p> <p>12 under pressure to come up with a natural cause, no</p> <p>13 third-party involvement conclusion, can I ask you to</p> <p>14 contemplate this: if you had found that he had been</p> <p>15 assassinated, might that, putting it rather bluntly,</p> <p>16 Superintendent, might that have rather enhanced your</p> <p>17 career as a police officer, if you had been,</p> <p>18 "Superintendent Pollard is the detective that proved the</p> <p>19 assassination", that would have been, it might be</p> <p>20 thought rather in your favour to say that?</p> <p>21 A. Well, I mean from my perspective, and without -- just</p> <p>22 from a purely professional perspective, it would have</p> <p>23 been a lot easier if he had have been murdered and from</p> <p>24 a professional perspective it would have been a very</p> <p>25 interesting inquiry to have worked on to establish who</p> <p style="text-align: center;">Page 203</p>
<p>1 used were specialist, they were not ex-job, ex-police or</p> <p>2 ex-army?</p> <p>3 A. No, they weren't sir.</p> <p>4 Q. You know such firms are plentiful, aren't they?</p> <p>5 A. Yes, there are those that provide additional security</p> <p>6 but this was a standard chauffeur company and he asked</p> <p>7 for no particular security arrangements, just a driver.</p> <p>8 Q. There was nothing like using different routes to</p> <p>9 Heathrow each time or anything like that?</p> <p>10 A. No.</p> <p>11 Q. Just to develop that point, in fact, I think on the</p> <p>12 morning of the last trip, he used a Ford Mondeo to go to</p> <p>13 Heathrow, and without disparaging Ford that may not be</p> <p>14 the best car to choose if you are looking at getaway</p> <p>15 pursuit -- you are smiling because you have probably had</p> <p>16 to drive them on the job but it is not the obvious</p> <p>17 choice is it of someone that thinks he is under threat</p> <p>18 of death?</p> <p>19 A. No, it is not.</p> <p>20 Q. There was no evidence -- as you have said the different</p> <p>21 routes, no evidence of different leaving times, no</p> <p>22 evidence of using different car parks at Heathrow,</p> <p>23 anything like that at all?</p> <p>24 A. No.</p> <p>25 Q. It is clear, isn't it -- indeed Ms Hill took us to the</p> <p style="text-align: center;">Page 202</p>	<p>1 was responsible, but, well, if I am blunt, it mattered</p> <p>2 not to me whether he was murdered or not. I was asked</p> <p>3 to do an inquiry, I conducted an inquiry, I was asked to</p> <p>4 carry out detailed tests, I did carry out detailed tests</p> <p>5 and those were my conclusions.</p> <p>6 Q. Does it come to this, that despite that it might have</p> <p>7 been rather more dramatic had you had a conclusion of</p> <p>8 murder, you followed only the evidence rather than media</p> <p>9 speculation, is that fair?</p> <p>10 A. Exactly. I followed the evidence, sir, that's correct.</p> <p>11 MR BEGGS: Thank you very much.</p> <p>12 Questions from MS BARTON</p> <p>13 MS BARTON: Mr Pollard, I just have one or two items for</p> <p>14 you.</p> <p>15 One of the issues concerns the analyst's chart that</p> <p>16 was prepared, the timeline of financial transactions.</p> <p>17 When we could see it was put that there were two</p> <p>18 versions of that chart, one in which some of the</p> <p>19 transactions relating to Paris had apparently been</p> <p>20 removed. You gave an explanation for that and I just</p> <p>21 want to get that clear, if I may.</p> <p>22 Is it the case that in the course of the police</p> <p>23 investigation organisations will sometimes cooperate</p> <p>24 with the police on the basis that they use that material</p> <p>25 only for intelligence purposes?</p> <p style="text-align: center;">Page 204</p>

1 **A. Yes, that's correct.**
 2 Q. If the material which they supply becomes evidentially
 3 useful, is there a process by which material supplied
 4 for intelligence purposes only can be converted to
 5 evidential use?
 6 **A. That does apply, yes, that's correct.**
 7 Q. Is that particularly true of financial institutions?
 8 **A. It can be. I mean in this case, as I say, initially it**
 9 **was for intelligence purposes only, however we did**
 10 **review that and I did review that with the department**
 11 **where that came from, in terms of the police department.**
 12 **And based on that, the passage of time, they were**
 13 **satisfied I could disclose that without having to make**
 14 **any PII application and having then disclosed it, it**
 15 **meant that the more populated spreadsheet was equally**
 16 **disclosed.**
 17 Q. The reason that the material entries were removed from
 18 one of the versions of the sheet was not because the
 19 police wanted them out but because the organisation
 20 supplying them wanted them removed; is that correct?
 21 **A. Yes, where I got them from had asked that I did not**
 22 **disclose those, yes, that's right. For the reasons of**
 23 **sensitivity et cetera.**
 24 Q. Thank you.
 25 Turning now to open source material, you were taken

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1 to a report dated 15 April 2014 at bundle 5, page 385.
 2 You don't need to turn it up, I don't think.
 3 That made reference to open source material at that
 4 date. Do you know what open source material was in fact
 5 available on the date of Mr Perepilichny's death?
 6 **A. No, I don't, sir.**
 7 Q. Is it right that his death in fact created a lot of
 8 online material over the weeks, months and years that
 9 followed?
 10 **A. Yes, that would appear to be the case, sir.**
 11 Q. You were taken to the Barron's article at bundle 1,
 12 page 22. Again I don't think you need to go to it.
 13 That article in fact, as you pointed out, uses the
 14 wrong spelling for Mr Perepilichny's name, doesn't it?
 15 **A. It does. It uses the wrong spelling of the Christian**
 16 **name and I think there is a Y that is missing off the**
 17 **surname I believe.**
 18 Q. If one searched with the proper spelling of
 19 Mr Perepilichny's first name and surname, it is far
 20 from clear that that article would even come up, if it
 21 were on the internet as open source?
 22 **A. That would appear to be -- that could be the case, yes.**
 23 Q. If we look at the CAD message, we might go to this
 24 briefly, please, in the witness bundle at page 132, do
 25 we there see at 18.08 reference to the Experian details

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1 and then reference to the open source details that were
 2 being sought by the RIO officer?
 3 **A. Yes, that's correct.**
 4 Q. The details there were the correct spelling of the name?
 5 **A. Yes, that's correct.**
 6 Q. Yes.
 7 What we can see from the CAD is that on that night,
 8 at approximately 18.00 and thereafter, the search was
 9 being done against "Alexander Perepilichny", spelt
 10 correctly?
 11 **A. Yes.**
 12 Q. Then we turn to the correspondence that came from
 13 a number of persons between the death and your
 14 investigation starting on 28 November; is that right?
 15 **A. Yes.**
 16 Q. You were taken to that in detail and I only want to
 17 establish this. What date did the first post mortem in
 18 fact take place?
 19 **A. 14 November 2012.**
 20 Q. In fact the first post mortem preceded the first letter
 21 from any third party about the background of
 22 Mr Perepilichny; is that right?
 23 **A. Yes, that's right.**
 24 Q. You then were asked about inquiries which could have
 25 been conducted in Paris. Could I take you, please, you

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1 said that from your point of view there was no useful
 2 inquiries to conduct in Paris?
 3 **A. Yes, that's correct.**
 4 Q. Why do you say that?
 5 **A. Well, it was established that he had been over there**
 6 **with an acquaintance. The receipts and credit card**
 7 **information suggested that he was just there with**
 8 **himself and another. And the meeting with the experts**
 9 **on 17 December did not raise any concerns about there**
 10 **being any requirement to conduct any forensic analysis**
 11 **or tests in Paris.**
 12 **I specifically asked in that meeting about**
 13 **controlled release medicines and they said it was highly**
 14 **unlikely. They also said that, because, you know,**
 15 **clearly we don't know -- there is no point searching**
 16 **a room if you don't know what you are looking for, you**
 17 **are going on a fishing trip and as on the circumstances**
 18 **that he displayed, their advice was that it would appear**
 19 **something more immediate took place, rather than**
 20 **something over the passage of time.**
 21 **And so for those reasons I recorded a policy entry**
 22 **decision on 18 December which meant that we wouldn't be**
 23 **examining the room in Paris and clearly there were no**
 24 **viable lines of inquiry for me to pursue in that**
 25 **country.**

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<p>1 Q. I am going to ask you to look at that because there may 2 be an important entry on it, it is at bundle 9, page 91, 3 sir, and it is policy number 34. 4 A. I don't think I've got bundle 9 have I? I probably will 5 have, I've got most of them but not bundle 9. 6 Q. Bundle 9, please, that is the police core bundle. 7 A. Okay, right. Which is the page number? 8 Q. Page 91. 9 This is your policy entry number 34; is that right? 10 A. Yes. 11 Q. A HOLMES copy of it? 12 A. Yes. 13 Q. Once on HOLMES, material cannot be deleted or altered, 14 is that right? 15 A. That's correct. 16 Q. I just want to ask you before we go to the detail of 17 this, have you ever in any inquiry instructed the 18 multidisciplinary medical team or team of medical 19 experts that you instructed in this case? 20 A. Have I? 21 Q. Have you ever before -- 22 A. Yes. 23 Q. -- in an inquiry of any sort instructed the 24 multidisciplinary team that you instructed in this case? 25 A. No. I have -- this was a first for me and for a number</p> <p style="text-align: center;">Page 209</p>	<p>1 Q. Then at paragraph 5 of that, were the experts asked 2 whether there were substances that experts could 3 categorically identify which could be tested for and 4 what was their response? 5 A. Bullet point 4 is: 6 "Having listened to that advice and taken all of the 7 circumstances into account, my decision is ..." 8 Q. The one above. In fact we have two files, we will get 9 to that one in a moment. 10 A. "At this stage there are no substances that experts can 11 categorically identify could be tested for and so any 12 such exam would purely be a fishing trip." 13 Q. Were you controlling what the experts were doing or was 14 that the other way round, did they decide what they did? 15 A. Yes, I was taking their advice. 16 Q. The conclusions from that I think you were just going to 17 draw the threads together for us, having listened to -- 18 A. Yes, so having listened to that advice and taken all the 19 circumstances into account, my decision is that this is 20 not a legitimate proportionate viable line of inquiry 21 that will support investigation. 22 Q. With that you are talking about Paris? 23 A. Yes. 24 Q. Thank you. 25 Then lastly, Ms Hill was putting to you, somewhat</p> <p style="text-align: center;">Page 211</p>
<p>1 of other colleagues for that matter. The actual number 2 of experts all in one room to discuss one case of 3 a sudden death is very unique and even in a murder 4 inquiry you wouldn't necessarily have that number of 5 experts all together to discuss the circumstances, you 6 may have one or two. 7 Q. What did you ask that team of experts to do? 8 A. I asked that team of experts to go and find me or tell 9 me: whether Mr Perepilichny had been poisoned or not; 10 and if he had have been poisoned, did that amount to his 11 murder; and if he had have been poisoned or murdered by 12 poisoning, where that would likely to have been taken 13 place, when, how, and that would have then set other 14 lines of inquiry. 15 Q. In the context of your decision not to conduct inquiries 16 in Paris, will you just go to bullet point 4, please, 17 and tell us there what you were told by the experts at 18 that time as to controlled release poison? 19 A. Right: 20 "The terms of any controlled release medicines that 21 could be administered bringing about a delayed reaction 22 are quite unusual and can be eliminated." 23 Q. That what you were told at the time, is it? 24 A. That is what I was told at the time and that is what 25 I recorded in my policy file.</p> <p style="text-align: center;">Page 210</p>	<p>1 pejoratively, that your conclusion in your report was 2 that there was no evidence to suggest that there is any 3 third-party involvement in Mr Perepilichny's death. 4 Was that the information which you were being given by 5 the experts at the time you were conducting the 6 investigation? 7 A. Yes. 8 Q. Does that remain the case? 9 A. Yes, it does, sir. 10 Q. Just so that we can confirm that, if we go, please, to 11 the experts' bundle, bundle 3, page 872, so it is the 12 core experts' bundles? 13 THE CORONER: Just tell me what it is because I may have it 14 somewhere else. 15 Is it the latest joint report? 16 MS BARTON: It is the latest joint report, paragraph 35. 17 From the pathologists. 18 THE CORONER: I mean I have been reading that this morning, 19 so I have it but it is not here, it is on my desk. 20 MS BARTON: You may recall the paragraph, it is a very short 21 one and quite a succinct summary. 22 A. What page number is it, sorry? 23 Q. It is page 872, which is, sorry, page down, do you have 24 the pagination at the bottom? Because we are looking 25 at -- it is top right, 872.</p> <p style="text-align: center;">Page 212</p>

<p>1 A. I've got -- 2 Q. And the electronic numbering? 3 A. Yes. 4 Q. Paragraph 35? 5 A. Yes. 6 Q. A question is asked of the joint experts: was there any 7 evidence of third-party involvement in the death at post 8 mortem? 9 What was the reply, which is the agreed position of 10 the joint experts? 11 A. "The body was examined by three experienced 12 pathologists, two of whom are forensic pathologists. 13 There was no positive pathological evidence of third 14 party assault nor of restraint for the purposes of 15 a forced administration of drugs." 16 Q. Indeed is it your evidence, Superintendent Pollard, that 17 that has been the position of the pathologists from day 18 one till now? 19 A. Yes, sir. 20 Q. Did that inform the way in which you conducted your 21 investigation and identified lines of inquiry? 22 A. Yes. 23 Q. Similarly, in terms of toxicology, during your 24 investigation did the toxicologist at any stage identify 25 any poison within Mr Perepilichny's system?</p> <p style="text-align: center;">Page 213</p>	<p>1 Departed the UK London Heathrow on 11 November 2012 at 2 21.40 and travelled to Russia. We hold no information 3 about his travel or duration of his stay in the UK prior 4 to his departure on 11 November 2012." 5 Q. I think you said his travel, I think you mean his 6 arrival, I think it was a misreading, "no information 7 about his arrival"? 8 A. Sorry, you are correct, yes, "We hold no information 9 about his arrival", sorry, that is correct. 10 Q. Do you mind turning on to section 11, please, where 11 there is another letter, again from GLD with some follow 12 up answers on Mr Pavlov. 13 A. Yes. 14 Q. Do you see that, that is a letter again to Mr Travers 15 dated 24 June 2016. 16 A. Yes. 17 Q. The large final paragraph, could you read that out for 18 me, please? 19 A. So: 20 "Andrei Pavlov, Home Office data indicates that 21 Pavlov was a frequent traveller to the UK both before 22 and after 11 November 2012. Our checks in response to 23 the coroner's request of 6 April indicated that Pavlov 24 departed the UK on 11 November 2012. Our records 25 indicate that he returned to the UK on 12 November 2012</p> <p style="text-align: center;">Page 215</p>
<p>1 A. No. 2 Q. Did they identify any manner in which that poison could 3 have been administered given the pathological findings? 4 A. No. 5 MS BARTON: Thank you. 6 MR SKELTON: Sir, I have a couple of points of clarification 7 about Mr Pavlov's movements that I would like Mr Pollard 8 just to see if I may -- you, sir, may have some 9 questions as well as well before or after. 10 May I just take him to those documents? 11 Further questions from MR SKELTON 12 MR SKELTON: Superintendent Pollard, the miscellaneous 13 bundle, if you could go to tab 7, please, do you have 14 that? It is a letter from the Government Legal 15 Department to Mr Travers, the senior coroner, dated 16 4 May 2016. It is a response to requests from his 17 office for information regarding the movements of 18 certain individuals, one of whom includes Andrei Pavlov. 19 A. Yes. 20 Q. Would you just read out that, save for the date of 21 birth, please. 22 A. Sorry, read out -- 23 Q. The section on Mr Pavlov? 24 A. Yes right so: 25 "Visit visa valid from 24 July 2012 to 24 July 2017.</p> <p style="text-align: center;">Page 214</p>	<p>1 and departed again on 14 November. He returned to the 2 UK on 25 November and departed on 27 November. He 3 returned on 23 January 2013 and departed on 25 January. 4 "This pattern of frequent short visits to the UK is 5 consistent both before and after 11 November 2012." 6 MR SKELTON: Thank you. 7 THE CORONER: He left on the 11th but comes straight back on 8 the 12th? 9 A. Yes. 10 THE CORONER: Nobody else? No. 11 Thank you very much. 12 Thank you. 13 A. Thank you, sir. 14 THE CORONER: Only if you are very keen. 15 MR SKELTON: We do need a short break, sir. 16 THE CORONER: We might need a long break. 17 MR SKELTON: A short break, I think it is going to be 18 necessary at least for the shorthand writer. 19 THE CORONER: Yes. 20 MR SKELTON: DC Burden, sir, I think has waited patiently 21 all day and I think he is caught up in a murder trial 22 from tomorrow, so it may be that if we could try and 23 squeeze him in, I know -- 24 MR MOXON BROWNE: Sir, I believe I gave a rather gloomy 25 forecast for the length of time I would be with this</p> <p style="text-align: center;">Page 216</p>

1 witness, it is rapidly truncating to about three
 2 minutes.
 3 THE CORONER: Is that alright with everybody if we have
 4 a go? All right, then do we need a break now?
 5 MR SKELTON: We do, for five or ten minutes.
 6 THE CORONER: Yes, certainly.
 7 (5.20 pm)
 8 (A short adjournment)
 9 (5.35 pm)
 10 MR SKELTON: Sir, the final witness of today is Detective
 11 Constable Burden.
 12 THE CORONER: Yes.
 13 DC LAWRENCE BURDEN (sworn)
 14 Questions from MR SKELTON
 15 MR SKELTON: Thank you. Could you state your full name to
 16 the court, please.
 17 **A. Yes, I am Detective Constable Lawrence Burden.**
 18 Q. At the time that you were involved in the investigation
 19 into Mr Perepilichny's death, what was your status in
 20 Surrey Police?
 21 **A. I was the detective constable working in the criminal**
 22 **investigation department at Staines police station.**
 23 Q. There are three documents I think that you have in the
 24 bundle that we are putting before the court for the
 25 purposes of this hearing, you will find them in the

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1 witness bundle under tab 26, if you could be assisted
 2 with getting a copy -- thank you.
 3 **A. Thank you.**
 4 Q. Do you see those?
 5 **A. Yes.**
 6 Q. The first one under tab A is an officer's report
 7 entitled "DC Burden re summary of investigation to
 8 date/initial actions".
 9 **A. Yes.**
 10 Q. That is your report on Operation Daphne. Who did you
 11 produce that report for?
 12 **A. Well that is the report that was put on the Surrey**
 13 **Police crime and information system following the**
 14 **officers' attendance on 10 November.**
 15 Q. Were you aware when you completed that report, it is
 16 dated 28 November, that you were handing over to
 17 a senior officer to take over the investigation?
 18 **A. Yes.**
 19 Q. A new SIO, Pollard?
 20 **A. That's correct, yes.**
 21 Q. The second document is a copy I think of your notebook,
 22 so it is a transcription copy. Do you see that, under
 23 B?
 24 **A. Yes.**
 25 Q. That is your notebook from your attendance at the scene

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1 of Mr Perepilichny's collapse?
 2 **A. That's correct, yes.**
 3 Q. On Saturday, 10 November?
 4 **A. Yes.**
 5 Q. Thirdly, a witness statement dated 2 July 2016, so that
 6 presumably was produced in the context of the inquest
 7 which was then being held in Surrey Coroners' Court?
 8 **A. Yes.**
 9 Q. That sets out your involvement with the investigation up
 10 to 29 November 2012?
 11 **A. That is correct, yes.**
 12 Q. Were you effectively in charge of the investigation --
 13 we will come on to who made a few decisions early on at
 14 the scene, were you effectively in charge of the
 15 investigation during that period?
 16 **A. Yes, I was termed as the officer in charge of the**
 17 **investigation.**
 18 Q. I am right, you attended the scene but there were key
 19 decisions made in fact by DS Seear and DCI Collwood at
 20 the scene weren't they, as the senior officers?
 21 **A. That's correct.**
 22 Q. You would defer to them on the reasons for those
 23 decisions?
 24 **A. Absolutely, yes.**
 25 Q. There is one specific thing I would like to ask you

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1 about, and that is your contact with Mr Gherson. Is it
 2 right that you were aware that Mr Gherson had been in
 3 contact with the police and a note had been taken of
 4 some contact by DS Drinkwater?
 5 **A. That's correct, yes.**
 6 Q. Could I just show you the contact and ask you whether
 7 you were aware of what he had said. It is in the same
 8 bundle, if you look under tab 15D, you will see a -- it
 9 starts at page 138 and what I would like to take you to
 10 is on page 144.
 11 This is a long computerised printout, it is in
 12 a less than easy format to read, capitalised letters
 13 which you are probably more familiar with reading than
 14 the rest of us. There is contact with Mr Drinkwater
 15 from Mr Gherson, were you aware of that contact?
 16 **A. At the time I wasn't, no, I believe I was on a rest day**
 17 **when that contact was received, but when I was next in**
 18 **work I would have read the report and seen the update on**
 19 **there.**
 20 Q. Were you briefed then directly by DS Drinkwater or would
 21 you have picked this up from the computer system?
 22 **A. I believe I picked it up from the computer system.**
 23 Q. What we see here is what you knew?
 24 **A. Yes.**
 25 Q. Then were you aware that Mr Gherson had provided his

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<p>1 contact details?</p> <p>2 A. Yes, I think that is in the update that DS Drinkwater</p> <p>3 provided on to the report.</p> <p>4 Q. If you go further down, you can see that you were</p> <p>5 contacted and given contact details for Mr Gherson in</p> <p>6 order to have a discussion with him?</p> <p>7 A. Yes.</p> <p>8 Q. Is that PC Lloyd, is that?</p> <p>9 A. That's correct, yes.</p> <p>10 Q. Would you have seen this system or spoken to PC Lloyd?</p> <p>11 A. I can't remember, I know PC Lloyd personally so having,</p> <p>12 once he had spoken to Mr Gherson, he may well have</p> <p>13 either telephoned me or sent me an email but ultimately</p> <p>14 he updated the report as well.</p> <p>15 Q. The note we then see on page 145, that starts on</p> <p>16 Wednesday, 21 November, "Contact received from</p> <p>17 Roger Gherson", is that your note that carries on</p> <p>18 overleaf to page 146 about two-thirds of the way down?</p> <p>19 A. That is correct, yes.</p> <p>20 Q. You are aware of the contact from Mr Gherson acting on</p> <p>21 behalf of Mrs Perepilichnaya and you are aware that</p> <p>22 there is involvement with the death of or into the -- in</p> <p>23 the investigation into the death of Mr Magnitsky, who</p> <p>24 died in Russian custody. He states Mrs Perepilichnaya</p> <p>25 is very distressed and worried about other incidents and</p> <p style="text-align: center;">Page 221</p>	<p>1 Q. You see his answer confirming no specific threats have</p> <p>2 been made?</p> <p>3 A. Yes.</p> <p>4 Q. Can you remember if he elaborated on that?</p> <p>5 A. I don't remember if he elaborated on it but I would like</p> <p>6 to think if he had provided any more information I would</p> <p>7 have put it on to the report.</p> <p>8 Q. Did you ask him directly about any knowledge he might</p> <p>9 have had about Mr Perepilichny's safety or</p> <p>10 Mr Perepilichny's concerns for his safety, save for the</p> <p>11 threats?</p> <p>12 A. I don't recall any conversation around that.</p> <p>13 Q. Did Mr Gherson say that he had had cause to contact the</p> <p>14 police himself some time after Mrs Perepilichnaya came</p> <p>15 to their attention in 2011?</p> <p>16 A. I don't recall any conversation around that.</p> <p>17 Q. He didn't say that Mr Perepilichny had expressed</p> <p>18 concern about his address being known or being contained</p> <p>19 within the police national computer as a result of</p> <p>20 Mrs Perepilichnaya's contact with the police?</p> <p>21 A. I don't recall anything like that, no.</p> <p>22 Q. Did you get the impression that Mr Gherson was being</p> <p>23 defensive or deliberately withholding information from</p> <p>24 you when you spoke to him?</p> <p>25 A. Not that I can remember, but it was a long time ago.</p> <p style="text-align: center;">Page 223</p>
<p>1 she has told Mr Gherson that some people said to her</p> <p>2 they know where she and the kids live?</p> <p>3 A. That is what I was told.</p> <p>4 Q. That specific concern, does that arise post death?</p> <p>5 A. Yes -- well, I was made aware of it post death.</p> <p>6 Q. By Mr Gherson in this conversation?</p> <p>7 A. Yes.</p> <p>8 Q. At this stage Mr Gherson is telling that you</p> <p>9 Mrs Perepilichnaya is very distressed and worried about</p> <p>10 the fact that her address is known?</p> <p>11 A. Yes.</p> <p>12 Q. What about the other incidents, what does that mean?</p> <p>13 A. Well, he obviously mentioned some other incidents. At</p> <p>14 the time my primary thought was does she believe, has</p> <p>15 she been threatened or anything like that, so my</p> <p>16 questioning was around: can he help me with any</p> <p>17 information as to any reason to suspect that</p> <p>18 Mrs Perepilichnaya was under threat?</p> <p>19 Q. Well, can you remember now or are there any other</p> <p>20 records of what the "other incidents" is referring to?</p> <p>21 A. No, I am not aware of any other records or what the</p> <p>22 other incidents could be.</p> <p>23 Q. You asked Mr Gherson about specific threats directly,</p> <p>24 did you?</p> <p>25 A. Yes, I did.</p> <p style="text-align: center;">Page 222</p>	<p>1 Q. Did he make any exertion of client confidentiality or</p> <p>2 legal privilege?</p> <p>3 A. Again, not that I can remember.</p> <p>4 Q. You requested special branch carry out checks, I think</p> <p>5 you record that on page 146, to be made and his</p> <p>6 immediate family, is that correct?</p> <p>7 A. That's correct, yes.</p> <p>8 Q. Is it right that that results in effectively a nil</p> <p>9 return, as in nothing of interest?</p> <p>10 A. That's correct, yes.</p> <p>11 Q. Did you have any further involvement with Mr Gherson at</p> <p>12 all during the time when you were involved with the</p> <p>13 investigation?</p> <p>14 A. No, from what I recall this conversation is the last</p> <p>15 contact that I had with him.</p> <p>16 Q. Is there anything else you can assist this court with</p> <p>17 when it comes to the evidence as to the endangerment of</p> <p>18 Mr Perepilichny's life or threats to that life?</p> <p>19 A. No, not that I can think of.</p> <p>20 MR SKELTON: Thank you.</p> <p>21 THE CORONER: Can you just help with this, do you have 26,</p> <p>22 so divider 26C which is your statement, do you remember,</p> <p>23 of 2 July 2016?</p> <p>24 Do you have that?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 224</p>

<p>1 THE CORONER: You spoke to Mrs Perepilichnaya as it turned 2 out, didn't you? 3 A. I did, yes. 4 THE CORONER: Just help us because we know there are two 5 places but can you see -- I think it is about a dozen 6 lines up from the bottom, a reference, do you see, to 7 the St George's Hill Tennis Club, we have heard about 8 a David Lloyd gym and a St George's Hill Tennis Club but 9 she was referring, is this right, he had been at the 10 St George's Hill Tennis Club before going jogging? 11 A. Yes, that is what she told me, yes. 12 THE CORONER: That is what she mentioned? 13 A. Yes. 14 THE CORONER: Thank you. Yes. 15 Questions from MR MOXON BROWNE 16 MR MOXON BROWNE: Mr Burden, this witness statement that the 17 coroner has just taken your attention to, is of course 18 dated July 2016 but I think in fact the substance of it 19 is taken directly from your personal notebook and from 20 a record which is called the current inquiry log report? 21 A. Yes, that's correct. 22 Q. You are not attempting in 2016 to remember but you are 23 rather consulting much more contemporaneous records in 24 order to make this statement; is that fair? 25 A. That's correct, yes.</p> <p style="text-align: center;">Page 225</p>	<p>1 what you recorded at the time in the occurrence inquiry 2 log? 3 A. Sorry, which page number is it? 4 Q. I'm sorry, we are on the second page of your statement 5 and I have checked what you said here about what 6 Mr Gherson told you, and for reasons that you have 7 explained, it is actually word for word from what was 8 written in the occurrence log inquiry. When you wrote 9 this statement you had that log by you obviously and 10 were able to be fairly confident that you had that 11 right? 12 A. That's correct, yes. 13 THE CORONER: All your documents that we looked at they are 14 true to the best of your knowledge and belief? 15 A. They are to the best of my knowledge, sir, yes. 16 MR MOXON BROWNE: That inquiry log is pretty well 17 contemporaneous, as I understand it, you write things in 18 that as and when they occur. 19 A. Yes, that's correct. 20 Q. You would have recorded your conversation with 21 Mr Gherson within a pretty short time of having had it? 22 A. I actually think that the update I put on to the report, 23 I put on the following day which was 22 November. 24 Q. Yes. 25 There has been a suggestion that, in fact, what</p> <p style="text-align: center;">Page 227</p>
<p>1 Q. Yes. 2 You went to see Mrs Perepilichnaya on the very 3 evening of Alexander's death, and you were in the house 4 for a little while talking to her. She told you, as the 5 coroner has just reminded you, that before going jogging 6 Alexander had gone to the St George's Hill Tennis Club? 7 A. That's right. 8 Q. I don't know whether you were in court when Mr Beggs was 9 asking questions of Mr Pollard? 10 A. I have been today, yes. 11 Q. Yes, because he was suggesting that this is an exclusive 12 club, quite close to where the Perepilichnyys lived? 13 A. It could be, yes. I don't know exactly where it is. 14 Q. Are you pretty confident that, having regard to the fact 15 that you did make a contemporaneous note, that 16 Mrs Perepilichnaya was telling you that her husband had 17 been to this club before going on his jog? 18 A. Yes, I am confident that is what she told me and that is 19 what I've got in my pocket notebook. 20 Q. Thank you. 21 As far as the conversation with Mr Gherson is 22 concerned that you have told us about, Mr Skelton was 23 taking you through that just a moment ago. Will you 24 take it from me that what you have written here on 25 page 319 is word for word, literally word for word, from</p> <p style="text-align: center;">Page 226</p>	<p>1 Mr Gherson was saying to you was not so much that 2 Mrs Perepilichnaya was concerned about what you record 3 Mr Gherson telling you, that people had said that they 4 know where her and the kids live, and that she was 5 distressed about other incidents, but that what she was, 6 what Mr Gherson was really saying was we need to get 7 some toxicology done in order that there can be 8 a funeral fairly quickly, and so he was not really 9 saying she is distressed in the way that you have 10 described but what he was saying was, "We have got to 11 have a funeral so get your testing done quickly". 12 Does that ring any bells with you? 13 A. I don't recall anything along those lines. 14 Q. No. 15 As far as special branch is concerned, you were 16 I think the first person to suggest that it might be 17 a good idea to consult with special branch. I think you 18 tell us that you did that on the day that you recorded 19 your conversation with Mr Gherson, which was 20 22 November. I think that the reference was made to 21 special branch on that day but they took their time 22 about coming back, do you recall that? 23 A. That's correct, yes. 24 Q. They didn't seem to have treated it with very great 25 urgency. What you recorded is not, as I think</p> <p style="text-align: center;">Page 228</p>

<p>1 Mr Skelton put to you, a nil return, what they said was, 2 "No adverse trace", in other words there was nothing on 3 the, on their record which casted anything negative or 4 adverse about Mr Perepilichny? 5 A. That's correct, it was actually -- 6 Q. Do you know what in fact the information was? I have 7 seen a record but it has largely been blanked out so it 8 is hard to tell? 9 A. I haven't seen anything. 10 MR MOXON BROWNE: You haven't seen that, no. 11 Thank you very much indeed. 12 Questions from MS HILL 13 MS HILL: DC Burden, just very briefly. You were the 14 investigating officer in the case were you prior to 15 Mr Pollard's involvement? 16 A. That's correct, yes. 17 Q. It was on your watch was it that the Hermitage letter of 18 17 November 2012 was received by the force? 19 A. Yes, that's correct. 20 Q. It is right isn't it that that letter doesn't appear to 21 have been logged on the police log at all; is that 22 right? 23 A. I believe there is a mention of a letter, an entry from 24 somebody in the contact centre because I believe what 25 happened was it got emailed into the contact centre,</p> <p style="text-align: center;">Page 229</p>	<p>1 coming in here at about 9.00 this evening. But please 2 I don't think there is any need, I am going to say there 3 is no need to move everything out, but if you could just 4 sort of pack things up -- not pack them up even but turn 5 things face down so that if -- and if I am here I will 6 try and ensure that, I might well have to be here but 7 I will try and make sure if perhaps people can be in the 8 back rows, but it is possible some people will just be 9 in here. There is a visit that is going on, you will 10 see it is starting out there now I think. 11 If you could make sure everything is moderately -- 12 it is not really the tidiness I am more concerned about, 13 but just that there is nothing face up. I will make it 14 plain, even if it is not me myself that if people are in 15 near they are not to turn papers over and so on. If you 16 could do that, that would be a good compromise. 17 I'm sorry it keeps happening. 18 Good, thank you all very much. 19 (5.55 pm) 20 (The Inquest adjourned until 10.00 am the following day) 21 22 23 24 25</p> <p style="text-align: center;">Page 231</p>
<p>1 they obviously worked out that it belonged to this 2 report and forwarded it on to myself. 3 Q. You didn't do very much in response to that letter, did 4 you, apart from note the contents as by way of 5 background. Is that right? 6 A. That's correct, and I forwarded it on to senior officers 7 as well. 8 Q. Which senior officers did you send it on to? 9 A. I don't remember. 10 Q. You are aware, aren't you, that it has later been 11 concluded by the Surrey Police gold group that more 12 should have been done in response to that letter? 13 A. I have not been party to any gold group meetings, I am 14 not aware of any outcomes or anything. 15 MS HILL: I see. 16 All right, thank you. 17 MS BARTON: Nothing thank you sir. 18 THE CORONER: All right, thank you very much and I am sorry 19 you had such a long wait. Thank you very much for your 20 patience. 21 A. Thank you. 22 THE CORONER: All right I am very grateful to everybody, 23 including the staff, for staying on so late. 24 If I can just toss a small grenade in and then leave 25 in a hurry. It is possible there will be something</p> <p style="text-align: center;">Page 230</p>	<p>1 2 3 I N D E X 4 5 Housekeeping1 6 DS IAN POLLARD (continued)2 7 Questions from MR MOXON BROWNE2 8 Questions from MR FEAR-SEGAL61 9 Questions from MS HILL73 10 Questions from MR BEGGS193 11 Questions from MS BARTON204 12 Further questions from MR SKELTON214 13 DC LAWRENCE BURDEN (sworn)217 14 Questions from MR SKELTON217 15 Questions from MR MOXON BROWNE225 16 Questions from MS HILL229 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 232</p>

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