

1 Friday, 23 June 2017
 2 (10.30 am)
 3 MR SKELTON: Sir, our first witness today is Mr Drinkwater.
 4 THE CORONER: Did I hear a rumour that Mr Hopper has joined
 5 us?
 6 MR SKELTON: Mr Hopper has joined us, sir, yes. He is sat
 7 with Mr Gherson.
 8 THE CORONER: But not quite yet.
 9 Yes, welcome.
 10 MR SKELTON: DS Drinkwater, can you hear me?
 11 THE WITNESS: Yes, it is Mr Drinkwater and yes I can hear
 12 you, thank you.
 13 MR SKELTON: Thank you.
 14 I am counsel to the inquest just for reference.
 15 I am going to ask you questions first and after that you
 16 will be asked questions by other representatives for the
 17 interested persons. You have pre-empted the question
 18 I was going to ask you which is: are you a serving
 19 police officer any longer?
 20 THE WITNESS: No longer, I retired just over a year ago.
 21 MR SKELTON: Thank you. You have I think produced a note in
 22 a computerised form that you wrote at the time, just
 23 after Mr Perepilichny's death on 18 November, is that
 24 correct, do you have a copy of that?
 25 THE WITNESS: I have been provided with a copy yes, and

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1 I recognise it as an entry I made.
 2 MR SKELTON: Sorry, the court clerk has not yet sworn you so
 3 I will ask for that to take place, thank you?
 4 THE WITNESS: Would you like me to go ahead and swear the
 5 oath.
 6 MR SKELTON: Yes, I think -- do you have it in front of you?
 7 THE WITNESS: I do.
 8 MR JONATHAN DRINKWATER (sworn)
 9 THE CORONER: Can you confirm the truth of everything you
 10 said to us when you were not on oath?
 11 **A. I am sorry, my Lord, I didn't hear the question.**
 12 THE CORONER: I said: can you confirm to us the truth of
 13 everything you said to us when you were not on oath? It
 14 will save us going through it all again.
 15 **A. Yes indeed. Sorry, sir, yes, indeed.**
 16 **Questions from MR SKELTON**
 17 MR SKELTON: You are no longer a serving police officer but
 18 at the time of the index events you were serving with
 19 Surrey Police?
 20 **A. Yes, that's correct. As a detective sergeant.**
 21 Q. When you received the phone call that we have seen on
 22 the computerised note, what was your capacity as the
 23 person receiving that call?
 24 **A. I would have been the duty detective sergeant, working**
 25 **in Staines criminal investigation department.**

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1 Q. You had not been specifically allocated to the
 2 investigation into Mr Perepilichny's demise?
 3 **A. No, in fact that phone call was my only involvement.**
 4 Q. That single phone call that you took from Mr Gherson?
 5 **A. Indeed.**
 6 Q. You should have with you two other documents I hope.
 7 One of which is a report which follows up from the
 8 original contact with Mr Gherson and that is dated
 9 14 January 2013. Do you have that?
 10 **A. Yes, I do, sir.**
 11 Q. You should I think also have an email that you sent to
 12 Lawrence Burden. Do you have that, dated
 13 18 November 2012?
 14 **A. Yes, I do, I have a copy of that.**
 15 Q. Thank you.
 16 Just as a matter of generality, do you stand by the
 17 contents of those documents, Mr Drinkwater?
 18 **A. Yes, indeed I do.**
 19 Q. Can I ask you first of all, when you took this phone
 20 call, did you know anything about Mr Perepilichny's
 21 death?
 22 **A. No, I knew absolutely nothing, in fact I had to pull up**
 23 **the computer report in order to find out what it was all**
 24 **about. I took an unsolicited call effectively.**
 25 Q. Had you in fact heard that he had died or that the

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1 police were involved in looking at the circumstances of
 2 the death?
 3 **A. That I don't recall, it was obviously some time ago**
 4 **I think I may have heard in passing that another team**
 5 **would have been involved in it, but I had no direct**
 6 **involvement.**
 7 Q. Had you had cause to hear about the Hermitage alleged
 8 fraud that had been committed in Russia some years
 9 previously?
 10 **A. No, I don't believe I knew anything about that until the**
 11 **caller brought that to my attention.**
 12 Q. Had you had cause to hear about the death of someone
 13 called Sergei Magnitsky who died in Russia and was
 14 connected with the investigation of that alleged fraud?
 15 **A. No, again, until I was given that information by the**
 16 **caller I don't believe I was aware of that.**
 17 Q. What time of day did the call take place?
 18 **A. That I cannot answer with any degree of certainty. The**
 19 **entry I have made on the report is timed at 20.56.41, so**
 20 **I would have thought it would have been an hour or so**
 21 **before that, perhaps.**
 22 Q. "An hour or so", did you say?
 23 **A. Perhaps, yes.**
 24 Q. Would it be your practice to write down the contents of
 25 a phone call you received in this way within a short

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1 period of time of the call taking place?
 2 **A. Yes, indeed it would. I probably would have written**
 3 **something down in a notebook.**
 4 Q. We can ask, I don't think I have seen a copy of
 5 a notebook in which that call may have been recorded but
 6 I will turn behind me to see if that is the case.
 7 No, we will see if there a notebook available but
 8 for the meantime, focusing on the timing of it, do you
 9 wait until the end of your sort of shift answering the
 10 telephone in this way as a detective before making these
 11 notes or do you tend to make a note on the computer
 12 system while you are still actively on duty?
 13 **A. Certainly I would have made a note before I terminated**
 14 **my tour of duty to make sure the information was**
 15 **accurate. I can't say how long after the phone call**
 16 **I would have recorded on the crime report, because**
 17 **I don't know at this moment at time what other incidents**
 18 **I would have been advising on or dealing on -- dealing**
 19 **with or taking decisions on.**
 20 Q. Do you think the phone call was therefore received at
 21 around 8.00 pm that evening?
 22 **A. Perhaps or perhaps even a little later.**
 23 Q. Some time between 8.00 pm and 20.56?
 24 **A. Perhaps so, yes.**
 25 Q. Is it conceivable it was received on a different date?

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1 **A. No. If I had done so I would have been entering a crime**
 2 **report to say I received a call yesterday.**
 3 Q. Can I ask you at the outset, do you have any independent
 4 recollection beyond reciting what is in your note as to
 5 what the contents of that call was?
 6 **A. No, not really, no.**
 7 Q. Can I try and jog your memory or at least get to you
 8 explain some of the things you have written.
 9 The first thing it says is you received a call from
 10 a Mr Roger Gherson who stated he was the family lawyer
 11 acting on behalf of the deceased's widow.
 12 **A. Yes.**
 13 Q. Presumably he explained who the deceased was at the
 14 start of the call?
 15 **A. He gave me the name and details and I believe I was able**
 16 **to pull up the crime report to at least have a brief**
 17 **look at what he was talking about.**
 18 Q. Do you think while he was talking you could see what it
 19 was that the subject matter was about on the computer?
 20 **A. I believe that is possible, but I don't know how much**
 21 **data was on that crime report.**
 22 Q. You record:
 23 "He wished to share that the deceased had been
 24 involved in a large scale fraud which appears to have
 25 initiated in Russia. He intimated that the deceased was

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1 a witness in these matters which had resulted in civil
 2 proceedings and the banning of a number of Russian
 3 suspects from travelling to the US and to Europe."
 4 **A. Yes.**
 5 Q. Did he explain what the fraud was about in any detail?
 6 **A. No, I don't believe he did.**
 7 Q. Did he explain that Mr Perepilichny had a role that
 8 could be conceived of as criminal or rather that he was
 9 a witness as to a criminal act?
 10 **A. That wasn't clear to me. My impression was that he was**
 11 **a witness to a criminal act, but I can't be sure.**
 12 Q. When one reads the note that you have written, because
 13 there is not much punctuation so it is quite hard to
 14 sort of work out which bits are independent as it were,
 15 you say, "Appears had been involved in a large scale
 16 fraud and then intimates that the deceased was
 17 a witness". Was he saying he was a witness to a large
 18 scale fraud or he had been involved in the fraud and
 19 then decided to become a witness? Do you see the
 20 distinction?
 21 **A. Yes, I do. My understanding was that he was a witness**
 22 **in the fraud.**
 23 Q. Thank you:
 24 "As a result [it goes on to say] of these issues the
 25 deceased is alleged to have been concerned regarding his

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1 safety in recent weeks."
 2 **A. Yes.**
 3 Q. Beyond what is noted there, can you recollect whether
 4 Mr Gherson elaborated on that remark in any way?
 5 **A. I am fairly confident he did not elaborate, which is why**
 6 **I later described his -- him as being a little**
 7 **defensive. I did ask further questions on that and**
 8 **I don't know what those questions were, I can't recall,**
 9 **but he did not elaborate.**
 10 Q. Are you sure that what he said was that Mr Perepilichny
 11 himself was concerned regarding his own safety?
 12 **A. That was my understanding, which is why I have recorded**
 13 **it in that way.**
 14 Q. When you then asked questions, what were those
 15 questions?
 16 **A. My concern at the time obviously would have been about**
 17 **the risk assessment for any family members that might**
 18 **still be about, so I obviously would have been concerned**
 19 **if there was still a threat to other persons and I would**
 20 **have asked him what drew him to that conclusion and why**
 21 **did he feel that further investigation should be done.**
 22 **But like I say I haven't got the record of any of**
 23 **those questions so I can't say for sure exactly what**
 24 **those questions would have been.**
 25 Q. Are you sure that you asked follow-up questions or did

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1 you not simply note this down with a view to someone
 2 else following up at a later date?
 3 **A. Well, as I say, I would have had concern that he may**
 4 **have been imparting information to me that might have**
 5 **posed a risk to other persons, so I would have expected**
 6 **to have asked further questions.**
 7 Q. Did Mr Gherson mention the death of Alexander Litvinenko
 8 that had occurred in 2006?
 9 **A. I don't recall.**
 10 Q. Did he mention the death of any other Russians that
 11 could be characterised as suspicious and give rise to
 12 concerns about Mr Perepilichny's death?
 13 **A. I don't recall.**
 14 Q. Was it your impression that Mr Gherson was calling you
 15 in order to encourage the police to investigate, to find
 16 out, if Mr Perepilichny had been murdered or to exclude
 17 that possibility in order to prevent suspicions arising
 18 unnecessarily?
 19 **A. I am not altogether sure, which was why I asked further**
 20 **questions of him. He appeared to have some concerns**
 21 **about the gathering of information around that and**
 22 **seemed keen for it to be explored in more detail.**
 23 **I never did get to the bottom of why.**
 24 Q. Did he say any words to the effect, "I want the police
 25 to make sure that they exclude the possibility this is

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1 suspicious, because otherwise rumours will ferment
 2 around Mr Perepilichny's death which are not correct?"
 3 **A. That I don't know. I certainly did go into**
 4 **a conversation with him and some of the things he was**
 5 **asking for were perhaps not within our gift because my**
 6 **understanding was that the post mortem had already taken**
 7 **place and obviously it was being dealt with through**
 8 **Her Majesty's coroner, so I was not altogether clear**
 9 **what his request was about. So I tried to explain in**
 10 **broad terms how the processes worked.**
 11 Q. When you say some of the things he asked for, the thing
 12 that you have noted is that he felt extensive toxicology
 13 work should be completed in respect of the victim. Is
 14 that what you are referring to or was there anything
 15 else?
 16 **A. No, that is what I am referring to, the toxicology.**
 17 Q. Did he use that word, "toxicology"?
 18 **A. I don't think he did.**
 19 Q. What did he say justified such investigations?
 20 **A. He didn't say, and I asked him, I believe, I asked him**
 21 **that question.**
 22 Q. Did you gain the impression that Mr Gherson thought that
 23 Mr Perepilichny may have been poisoned?
 24 **A. That was the clear implication from the comments that he**
 25 **was making, which is why I sought to gather additional**

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1 **information from him but he didn't elaborate.**
 2 Q. Did there come a point where you felt you needed to be
 3 a little bit definitive about the information you were
 4 giving to Mr Gherson?
 5 **A. There came a point where he appeared to be seeking**
 6 **information in respect of the investigation and I was**
 7 **uncomfortable with that, since I wasn't 100 per cent**
 8 **sure having had an unsolicited call who I was speaking**
 9 **to.**
 10 Q. In your officer's report, about midway down, after the
 11 reference to toxicology work being undertaken it says:
 12 "I explained at length that such matters were at the
 13 discretion of Her Majesty's Coroner and the examining
 14 pathologist, I also explained the constraints of the
 15 Data Protection Act in terms of discussing the detail of
 16 the case with him over the telephone."
 17 That is what you are referring to?
 18 **A. Yes, indeed.**
 19 Q. It then goes on to say:
 20 "When I asked further questions regarding why
 21 Mr Perepilichny felt concern for his safety Mr Gherson
 22 became defensive and stated that he too was bound by the
 23 Data Protection Act."
 24 Could you elaborate on that part of your discussion,
 25 please?

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1 **A. Well I don't remember the exact questions but certainly**
 2 **I asked more questions of him to perhaps try to see why**
 3 **he felt that further toxicology was necessary and he**
 4 **repeatedly said that he couldn't say or wouldn't say and**
 5 **made reference to the Data Protection Act. I found that**
 6 **strange. Hence my reference to him as being defensive.**
 7 Q. Are you sure he made reference to data protection and
 8 not simply to legal privilege, which is the more
 9 ordinary form of confidence which attaches to lawyer
 10 communications?
 11 **A. No, I am certain because I had already used the term**
 12 **"data protection" and he repeated the term back to me.**
 13 Q. You say he became defensive. Did you get the impression
 14 that he had gone too far in raising this suspicion and
 15 now wanted to pedal backwards in terms of initiating
 16 a police inquiry?
 17 **A. I am not altogether sure. I am not sure whether he**
 18 **understood the process or Her Majesty's Coroner's**
 19 **involvement in an unexplained death or whether he had**
 20 **genuine concerns but didn't feel in a position to share**
 21 **those concerns with me. I can't say.**
 22 Q. The conclusion you drew, was it, that Mr Gherson may
 23 have had some information which he hadn't given to you
 24 for some reason?
 25 **A. That certainly was the possibility, which is one of the**

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<p>1 reasons I felt it necessary to bring this phone call to 2 the attention of the officers who had direct 3 involvement. 4 Q. I don't want to force you to speculate. Do you think 5 that was what you felt or do you think there were, at 6 the time you felt there were other reasons why 7 effectively the conversation ended as it did? 8 A. It was quite a strange phone call and I found the 9 caller's behaviour quite strange, but I can't speculate 10 on why that might have been. 11 Q. Was there anything strange about the tone of the 12 conversation? 13 A. Apart from him coming across as being defensive, no. 14 Q. Did Mr Gherson speak so fast you may have misunderstood 15 what he was saying? 16 A. I don't believe so. 17 Q. The conversation then ended. You wrote your notes, 18 which we have seen in the capitalised form in the 19 computer database. You followed that up, I think very 20 shortly afterwards with an email. What caused you to 21 have that concern that you mention in your email, which 22 is that effectively you thought he might have been 23 a journalist? 24 A. Well, it seemed somewhat strange to me that he had 25 initiated the phone call to Surrey Police to share some</p> <p style="text-align: center;">Page 13</p>	<p>1 either the contemporaneous note, your report or the 2 email? 3 A. I don't believe so, I may have seen them in passing in 4 the following days to confirm they received or seen my 5 comments, no further than that. 6 Q. Were you aware for example that there was any contact 7 had with Mr Gherson and DC Burden, who at this stage was 8 in charge of the investigation? 9 A. No, I wasn't aware. 10 Q. Is there anything that I haven't elicited from you in 11 answer to these questions just now that you have to add 12 to the court today? 13 A. No, I don't think there is, sir. 14 MR SKELTON: Thank you. 15 Questions from MR MOXON BROWNE 16 MR MOXON BROWNE: Mr Drinkwater, I represent Legal & 17 General, the insurance company. Good morning to you. 18 I think you have been given a copy of this record, 19 written in capital letters, in which your account of the 20 telephone call is set out. Do you have that in front of 21 you? 22 A. Good morning to you. 23 I can't quite hear everything you are saying but 24 I do have a copy, if you are referring to the crime 25 report, yes.</p> <p style="text-align: center;">Page 15</p>
<p>1 of his concerns and when I tried, in what I felt was 2 a reasonable way, to explore what had brought about 3 those concerns, he withdrew and became very defensive. 4 It did occur to me that perhaps he was not able to 5 answer the questions because he was not Mr Gherson. 6 I wanted the officers who were dealing with it to be 7 absolutely clear that I could not identify the 8 individual on the phone and to be very careful 9 obviously, because of the concerns about releasing 10 information to the wrong people. 11 Q. Did you check whether there was a Mr Gherson as a lawyer 12 on the internet? 13 A. No, I did not. 14 Q. You appreciate I presume that it was perfectly 15 legitimate for someone's lawyer after that client has 16 died suddenly to make a phone call to the police if they 17 felt they have information that could assist? 18 A. Absolutely. I do. 19 Q. And it is in the public interest for such communication 20 to be made? 21 A. Indeed so. 22 Q. At all events we know it was the real Mr Gherson, as we 23 understand it there is no controversy about that. Did 24 you have any further contact with your colleagues about 25 this conversation which we have not seen recorded in</p> <p style="text-align: center;">Page 14</p>	<p>1 Q. Thank you. You will see that immediately above the 2 record of your telephone conversation there is an entry 3 timed on 17 November at 17.57 that reads: 4 "Letter received as an attachment in an email 5 received from Brown Rudnick, who act for Hermitage 6 Capital Limited. The letter provides background 7 information on the deceased, 8 Mr Alexander Perepilichny." 9 Do you see that? 10 A. Yes, sir, I can. 11 Q. Can you hear me? 12 A. Yes, I can hear you. 13 Q. Yes. What I wanted to ask you is whether you had 14 knowledge of the contents of that letter from 15 Brown Rudnick either before or after you spoke to 16 Mr Gherson, or was it not something you looked into? 17 A. I was not actively involved in any way in this incident, 18 it was other officers dealing with it. And the answer 19 to the question is no, neither before nor afterwards did 20 I have any knowledge of those things, to my knowledge. 21 Q. There was no way that you were putting together what 22 Mr Gherson told you with whatever might have been in 23 that letter? You didn't put the two together because 24 you didn't know what was in the letter, correct? 25 A. I wasn't aware of what was in the letter, I don't think</p> <p style="text-align: center;">Page 16</p>

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<p>1 I have ever seen the letter.</p> <p>2 Q. No.</p> <p>3 Just looking through your record of the conversation</p> <p>4 about halfway through, you were asked by Mr Skelton</p> <p>5 whether you were sure that Mr Gherson said that the</p> <p>6 deceased was alleged to have been concerned regarding</p> <p>7 his safety. I think you agreed that you were sure, or</p> <p>8 else you wouldn't have written it down. Correct?</p> <p>9 A. That's right.</p> <p>10 Q. But he didn't ask you about the next words, which were,</p> <p>11 "Regarding his safety in recent weeks ..." He was</p> <p>12 talking about something that had happened recently. Are</p> <p>13 you sure that he said that?</p> <p>14 A. My understanding is that he was referring to the recent</p> <p>15 weeks prior to the death of Mr Perepilichny. That was</p> <p>16 my understanding.</p> <p>17 Q. Yes. You didn't mention that before in answer to</p> <p>18 Mr Skelton but are you pretty sure that he was talking</p> <p>19 about something which included something that had</p> <p>20 happened in recent weeks?</p> <p>21 A. Well I used that phrase in the crime report. You know,</p> <p>22 this is a contact of a conversation that I took over</p> <p>23 four and a half years ago. I can't recall exactly what</p> <p>24 the words were. I have recorded that on the crime</p> <p>25 report, I presume that is because those were the words</p> <p style="text-align: center;">Page 17</p>	<p>1 obviously I have retired and any documents I would have</p> <p>2 had would have been handed in to Surrey Police on my</p> <p>3 retirement in April 2016.</p> <p>4 Q. That I understand. It is simply a question of whether</p> <p>5 it would be sensible or proportionate to try and chase</p> <p>6 down your PNB from that date or whether you are saying,</p> <p>7 "If I did make a note, it wouldn't have been in the</p> <p>8 PNB", that is what I am trying to get at?</p> <p>9 A. I see.</p> <p>10 On the basis that I had no involvement in that</p> <p>11 inquiry team -- it was being dealt with other</p> <p>12 officers -- I think it highly unlikely I would have made</p> <p>13 a pocket notebook entry of this phone call.</p> <p>14 Q. Thank you. That is helpful.</p> <p>15 You of course were senior in rank to the officer in</p> <p>16 charge, who was a Detective Constable Burden. You were</p> <p>17 then a sergeant?</p> <p>18 A. Yes, indeed.</p> <p>19 Q. I see that at the end of the message, you haven't</p> <p>20 touched on this, that you gave either advice or maybe</p> <p>21 an instruction, I don't know, to DC Burden that what had</p> <p>22 been said should be shared with the coroner's officer.</p> <p>23 So you took it seriously enough to either advise or</p> <p>24 direct that the officer in charge should take that</p> <p>25 particular action to get in contact with the coroner's</p> <p style="text-align: center;">Page 19</p>
<p>1 that he used or close to them.</p> <p>2 Q. Thank you.</p> <p>3 At the end of the message there is quite a lot of</p> <p>4 detail, including Mr Gherson's professional address,</p> <p>5 a mobile telephone number and an office telephone</p> <p>6 number. Do you see that?</p> <p>7 A. Yes, I do.</p> <p>8 Q. That indicates perhaps that you were making notes when</p> <p>9 this conversation took place of, for example, the mobile</p> <p>10 telephone number?</p> <p>11 A. Certainly I believe I would have written those contact</p> <p>12 details down to make sure that I recorded them</p> <p>13 accurately, yes.</p> <p>14 Q. Can you help me, is it likely, looking back on it now,</p> <p>15 that those notes were made, such as you did make</p> <p>16 were made on a scrap piece of paper or is it something</p> <p>17 which you would have entered in a personal notebook or</p> <p>18 can you not say?</p> <p>19 A. Well I used to keep a pocket notebook obviously as</p> <p>20 a serving police officer but that tended to be for</p> <p>21 evidential matters. I also used to keep a jotter,</p> <p>22 a book of things to remind myself of various bits and</p> <p>23 pieces.</p> <p>24 Q. Well --</p> <p>25 A. I can't say where those jotters would now be because</p> <p style="text-align: center;">Page 18</p>	<p>1 office, correct?</p> <p>2 A. Well, yes, out of professional courtesy I wanted the</p> <p>3 coroner to be aware that the solicitor for the family</p> <p>4 had some concerns around the death. I felt that was</p> <p>5 appropriate.</p> <p>6 Q. Yes.</p> <p>7 You also said, advised or directed that</p> <p>8 consideration be given to checks on the deceased and his</p> <p>9 immediate family with SB, that is special branch?</p> <p>10 A. It is, yes.</p> <p>11 Q. Thank you.</p> <p>12 Overall, did you get the impression that Mr Gherson</p> <p>13 had rung you up because he wanted to try to get</p> <p>14 information from you or did you get the impression that</p> <p>15 he was trying to impart information to you? Or was it</p> <p>16 both?</p> <p>17 A. I think initially I thought he was trying to impart</p> <p>18 information to me, which is why I have recorded what he</p> <p>19 said about his concerns on toxicology and so forth but</p> <p>20 he did ask questions that I was not able to answer,</p> <p>21 asking searching questions about the investigation. And</p> <p>22 then that is why I had to say I was not in a position to</p> <p>23 be able to disclose the information because of the</p> <p>24 constraints of the Data Protection Act.</p> <p>25 Q. Yes. We can see from the documents that you have been</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 looking at that almost immediately after making the</p> <p>2 entry that we have just been talking about, which is set</p> <p>3 out in capital letters -- what incidentally do you call</p> <p>4 that document?</p> <p>5 A. Well, it is known as a CRI -- excuse me, which is</p> <p>6 a crime recording incident, which we create similar to</p> <p>7 an electronic crime report.</p> <p>8 Q. Yes, so pretty well immediately after writing the CRI</p> <p>9 you got in contact with Detective Constable Burden and</p> <p>10 told him what had happened and what he ought to do. We</p> <p>11 have seen that document.</p> <p>12 A. Yes, I have.</p> <p>13 Q. You are uncertain at this distance of time how long</p> <p>14 before you took those actions you had actually had the</p> <p>15 conversation with Mr Gherson. You have told us it</p> <p>16 couldn't possibly have been the previous day. Can you</p> <p>17 say any more about the possible window, I think you said</p> <p>18 it might have been an hour but can you give more help on</p> <p>19 that?</p> <p>20 How quickly would you take action on a call like</p> <p>21 that or would it depend on what else --</p> <p>22 A. I would certainly want to record the information before</p> <p>23 the end of my tour of duty --</p> <p>24 Q. Yes.</p> <p>25 A. -- and so therefore I am confident the phone call was</p> <p style="text-align: center;">Page 21</p>	<p>1 I must have made some record of that prior to putting it</p> <p>2 on to the crime report.</p> <p>3 Q. Then going back four and a half years you cannot help</p> <p>4 with whether it was an hour or more than an hour before</p> <p>5 you noted it up on the crime report?</p> <p>6 A. I would have thought it would have been that sort of</p> <p>7 timescale but I wouldn't want to be pushed to say for</p> <p>8 certain, no.</p> <p>9 Q. Just so we fully understand it, prior to receiving this</p> <p>10 telephone call, you knew nothing at all about the</p> <p>11 incident which was the subject of the call?</p> <p>12 A. That's correct.</p> <p>13 Q. You had to, as it were, receive the information without</p> <p>14 any contextual understanding?</p> <p>15 A. No, not really. I don't know whether colleagues may</p> <p>16 have mentioned that there had been an unexplained death</p> <p>17 so I was aware in general terms, or whether it had even</p> <p>18 been in the press, I don't know, but no, in terms of</p> <p>19 active involvement, no I did not know anything about it.</p> <p>20 Q. You would, I expect, accept after many years in policing</p> <p>21 that if you don't know the context of something, it is</p> <p>22 more likely that you might misunderstand what is being</p> <p>23 said, because you have no contextual anchorage around</p> <p>24 which to interpret what is being said to you, would you</p> <p>25 accept that?</p> <p style="text-align: center;">Page 23</p>
<p>1 taken earlier. I can't say for sure because I don't</p> <p>2 know what other incidents -- I was the duty detective</p> <p>3 sergeant, there may well have been other arrests, there</p> <p>4 may well have been other activities that I had to advise</p> <p>5 on and become involved in.</p> <p>6 Q. It would depend very much on what else you had to do?</p> <p>7 A. Indeed, yes.</p> <p>8 MR MOXON BROWNE: Thank you.</p> <p>9 Questions from MR BEGGS</p> <p>10 MR BEGGS: Mr Drinkwater, you were the duty DS, is it for</p> <p>11 the north area of Surrey that night?</p> <p>12 A. I am sorry, I can't quite hear you, are you asking which</p> <p>13 area I was covering?</p> <p>14 Q. Yes, you were a duty detective sergeant, weren't you?</p> <p>15 A. I was the duty detective sergeant for Staines criminal</p> <p>16 investigations, for that tour of duty, yes.</p> <p>17 Q. Was that one police station or was it an area within</p> <p>18 Surrey Police?</p> <p>19 A. It was one police station but it covers an area within</p> <p>20 Surrey Police.</p> <p>21 Q. Following from the previous questioning, it sounds like</p> <p>22 you didn't make any formal note of the telephone</p> <p>23 discussion other than the one we see in the --</p> <p>24 A. I don't believe I would have remembered the full address</p> <p>25 of Mr Gherson and his telephone number, so clearly</p> <p style="text-align: center;">Page 22</p>	<p>1 A. That is certainly possible.</p> <p>2 MR BEGGS: Yes. Thank you very much.</p> <p>3 MS BARTON: Nothing from me, thank you, sir.</p> <p>4 MR SKELTON: No.</p> <p>5 Subject to questions from you, sir, that is all.</p> <p>6 THE CORONER: Thank you very much, Mr Drinkwater, that is</p> <p>7 all. I am very grateful for your help. Thank you.</p> <p>8 A. Thank you, my Lord.</p> <p>9 MR SKELTON: Sir, the next witness is Mr Roger Gherson.</p> <p>10 MR ROGER GHERSON (sworn)</p> <p>11 THE CORONER: There is a seat there, but sit or stand</p> <p>12 whichever you like.</p> <p>13 A. I am fine. If I get tired I will sit down.</p> <p>14 Questions from MR SKELTON</p> <p>15 MR SKELTON: Mr Gherson, could you state your full name to</p> <p>16 the court, please.</p> <p>17 A. Roger Morris Gherson.</p> <p>18 Q. I can already tell you are going to speak quite fast,</p> <p>19 would you mind speaking slowly and loudly we are in a</p> <p>20 very large court, with a stenographer.</p> <p>21 A. Anything to accommodate. You have to speak up and tell</p> <p>22 me if I have to talk up, because I've got a hearing aid</p> <p>23 and sometimes I talk softly.</p> <p>24 Q. Thank you.</p> <p>25 You are a solicitor and have been for many years</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 now?</p> <p>2 A. Since 1981, yes.</p> <p>3 Q. You are I think primarily an immigration lawyer; is that</p> <p>4 correct?</p> <p>5 A. Correct, I started off as a general solicitor in general</p> <p>6 practice and started to specialise in immigration in</p> <p>7 1988.</p> <p>8 Q. Do you do the full range of immigration work or do you</p> <p>9 focus on a particular --</p> <p>10 A. I have a firm which amounts to about 75 people, we deal</p> <p>11 with normal immigration, investor visas, visitor's</p> <p>12 visas, work permits and we deal with complicated asylum</p> <p>13 and extradition cases.</p> <p>14 Q. Among your client base I think you have had cause to</p> <p>15 assist a number of Russians over the years?</p> <p>16 A. Yes, my first case in Russia was in 1994. And we got</p> <p>17 a reputation in the market which, after Putin arrived</p> <p>18 there was a volume of clients leaving and we had</p> <p>19 a significant number of clients from that area, but we</p> <p>20 cover the whole world.</p> <p>21 Q. Is it right that you have some acquaintance with people</p> <p>22 involved with this Inquest, namely Mr Browder, for</p> <p>23 example?</p> <p>24 A. I have known Bill Browder since 1989, yes.</p> <p>25 Q. In what capacity, may I ask?</p> <p style="text-align: center;">Page 25</p>	<p>1 A. Sure, that is why I have asked Mr Hopper to come in</p> <p>2 today to assist me if necessary.</p> <p>3 Q. He is over there, now.</p> <p>4 A. Yes.</p> <p>5 Q. Thank you.</p> <p>6 When did you first become aware of the alleged fraud</p> <p>7 in Russia involving Hermitage?</p> <p>8 A. Neil Micklethwaite who acts for -- who works at</p> <p>9 Brown Rudnick used to be a partner of mine in 2007. And</p> <p>10 I don't remember the specific date but I believe the</p> <p>11 Magnitsky story came up around that time and as the</p> <p>12 litigator he was handling it.</p> <p>13 Q. Were you aware of the fraud itself, the alleged fraud --</p> <p>14 A. I was.</p> <p>15 Q. -- and the involvement of the Moscow tax office?</p> <p>16 A. I was aware of the circumstances behind the case, yes.</p> <p>17 Q. And the death of Mr Magnitsky --</p> <p>18 A. I was aware of that, yes.</p> <p>19 Q. -- in circumstances which were, to say the least, said</p> <p>20 to be suspicious?</p> <p>21 A. He died in prison after having been there for a year,</p> <p>22 that is the information I have, yes.</p> <p>23 Q. Were you aware of Mr Browder's campaign internationally</p> <p>24 and in Russia to seek justice for Mr Magnitsky and</p> <p>25 thereafter to seek justice in respect of the</p> <p style="text-align: center;">Page 27</p>
<p>1 A. I dealt with him in respect of a personal matter.</p> <p>2 Q. Are you friends, acquaintances?</p> <p>3 A. We see each other from time to time.</p> <p>4 Q. And Mr Pastukhov, Vladimir Pastukhov?</p> <p>5 A. Yes, I know Vladimir Pastukhov and he assists me on</p> <p>6 occasion on different matters.</p> <p>7 Q. Just to be clear, are there any other people who have</p> <p>8 some connection with this Inquest other than of course</p> <p>9 Mr and Mrs Perepilichnyy?</p> <p>10 A. Well, this is where I come into the privilege area, so</p> <p>11 I am not sure what I can disclose to you as to who I act</p> <p>12 for or not.</p> <p>13 Q. If your clients names are privileged because they have</p> <p>14 come to speak to you for advice on a confidential basis</p> <p>15 then of course you don't need --</p> <p>16 A. I mean I act for a number of people, some of whom may be</p> <p>17 connected to this story and have dealt with their</p> <p>18 matters.</p> <p>19 Q. Can I just ask whether that puts you in a conflict in</p> <p>20 terms of what you can say to this court, that</p> <p>21 relationship with those people?</p> <p>22 A. I have no idea.</p> <p>23 Q. As we get to areas where you feel that you are unable to</p> <p>24 give answers because it is privileged, will you make</p> <p>25 that clear, please?</p> <p style="text-align: center;">Page 26</p>	<p>1 conspirators that he thought were involved in the fraud?</p> <p>2 A. Correct.</p> <p>3 Q. You were?</p> <p>4 A. Yes.</p> <p>5 Q. When did you first meet Mr and Mrs Perepilichnyy?</p> <p>6 A. I can't recollect specifically because clients come in</p> <p>7 to make enquiries about moving to the UK and they may</p> <p>8 just pop in for a brief chat, they go away for a period</p> <p>9 of time, they come back et cetera. But my records,</p> <p>10 insofar as they exist, we started to look at an investor</p> <p>11 visa for them circa around December/January 2009/2010.</p> <p>12 Q. You mentioned though in your statement that:</p> <p>13 "Between 2002 and 2011, through one or other of my</p> <p>14 firms ..."</p> <p>15 A. 2002?</p> <p>16 Q. Yes. Paragraph 2.</p> <p>17 A. Ah, I may have made an error there.</p> <p>18 Q. It may be -- we had heard suggestion from Liz Kaye, who</p> <p>19 is someone I think you know, that there had been</p> <p>20 a contact with the bank, EFG Private Bank and</p> <p>21 Mr Perepilichnyy some time previously, several years</p> <p>22 before they ended up having a full relationship?</p> <p>23 A. I am corrected. He may have come in earlier. As I said</p> <p>24 to you, they come in earlier, they make enquiries, they</p> <p>25 go away, they come back and it is quite possible</p> <p style="text-align: center;">Page 28</p>

<p>1 I introduced them to EFG a few years earlier.</p> <p>2 Q. Did you have cause to progress a visa application in the</p> <p>3 early 2000s --</p> <p>4 A. Sorry?</p> <p>5 Q. Did you have cause to progress or make a visa --</p> <p>6 A. Yes, we were instructed in 2010 to do the application.</p> <p>7 Q. What was the purpose of Mr and Mrs Perepilichny's</p> <p>8 presence in the United Kingdom?</p> <p>9 A. What was the presence?</p> <p>10 Q. What was the purpose of their being in the UK?</p> <p>11 A. He decided to move to the UK, as a lot of people do.</p> <p>12 Decided to immigrate to the United Kingdom with their</p> <p>13 family and children for education or other purposes.</p> <p>14 I don't recollect the specific purpose for him coming</p> <p>15 here.</p> <p>16 Q. It has obviously been said in this Inquest by</p> <p>17 Mrs Perepilichnaya that that was the purpose. Can you</p> <p>18 recollect if that was the principal purpose back in 2010</p> <p>19 when you were first instructed?</p> <p>20 A. What was the?</p> <p>21 Q. Education?</p> <p>22 A. Yes. Quite possibly. I don't recollect specifically</p> <p>23 but that is the usual reason people move here.</p> <p>24 Q. When you mentioned it, had you heard about it in the</p> <p>25 context of this Inquest or do you --</p> <p style="text-align: center;">Page 29</p>	<p>1 Q. Sorry, and was the litigation something that was</p> <p>2 personal to him in his businesses as opposed to involved</p> <p>3 with Hermitage?</p> <p>4 A. I am telling that you there was litigation in</p> <p>5 Switzerland. I don't recollect the specific issues.</p> <p>6 And I am not sure that I can tell you what they were.</p> <p>7 Q. I asked you that question in the context of why he might</p> <p>8 have moved to the UK. Was there in fact a connection</p> <p>9 between that litigation and his move to the UK?</p> <p>10 A. He never told me that that was the reason for him coming</p> <p>11 to the UK. Not that I recollect, no.</p> <p>12 Q. Just to be clear, you don't know whether he was</p> <p>13 personally a party to the litigation or whether his</p> <p>14 businesses were party to that litigation?</p> <p>15 A. I can't recollect, I know that he had litigation in</p> <p>16 Switzerland.</p> <p>17 Q. You don't know if it was civil or criminal litigation?</p> <p>18 MR HOPPER: I am being asked to intrude. Your Honour,</p> <p>19 I take the view that the questions that are being asked</p> <p>20 at the moment, as long as they are factual and relate</p> <p>21 even to the extent they relate to confidentiality,</p> <p>22 confidential matters are overridden by your direction in</p> <p>23 effect through counsel. That doesn't extend to legal</p> <p>24 professional privilege, privilege only relates to issues</p> <p>25 where Mr Gherson may be asked as to whether he gave</p> <p style="text-align: center;">Page 31</p>
<p>1 A. No, I have not heard anything in the context of this</p> <p>2 Inquest other than what I have seen in the press, and</p> <p>3 I have not read all the press articles.</p> <p>4 Q. Were you aware that Mr Perepilichny didn't ostensibly</p> <p>5 have any business interests in the United Kingdom prior</p> <p>6 to his arrival here?</p> <p>7 A. I would have advised him to take initial tax advice</p> <p>8 because there are tax consequences when a non-resident</p> <p>9 moves to the United Kingdom if he has businesses here,</p> <p>10 and I do not recollect him stating that he needed advice</p> <p>11 in respect of any business interests in the UK.</p> <p>12 Q. Did he mention any concerns about criminal or civil</p> <p>13 litigation in Russia?</p> <p>14 A. He had mentioned concerns about some litigation in</p> <p>15 another country, yes.</p> <p>16 Q. Ukraine?</p> <p>17 A. No.</p> <p>18 Q. Can you tell me the country or is that privileged?</p> <p>19 A. Switzerland.</p> <p>20 Q. Switzerland?</p> <p>21 A. Yes.</p> <p>22 Q. Are you then referring to his involvement with the</p> <p>23 Hermitage prosecution -- the prosecution of the alleged</p> <p>24 fraudsters in the Hermitage --</p> <p>25 A. No, I think that litigation possibly arose before that.</p> <p style="text-align: center;">Page 30</p>	<p>1 advice or whether he was instructed for the purposes of</p> <p>2 giving advice.</p> <p>3 For the moment I am content that factual matters be</p> <p>4 explored.</p> <p>5 THE CORONER: Thank you very much.</p> <p>6 MR SKELTON: Just going back to my question, Mr Gherson, you</p> <p>7 were not giving advice in respect of any Swiss</p> <p>8 litigation I presume because otherwise you would</p> <p>9 remember it?</p> <p>10 A. Sorry?</p> <p>11 Q. You were not giving legal advice in respect of that</p> <p>12 litigation, were you?</p> <p>13 A. Not directly.</p> <p>14 Q. What does that mean?</p> <p>15 A. I have two firms. I have a firm called Gherson</p> <p>16 Solicitors which deals with immigration matters and</p> <p>17 I have a firm called Discreet Law. We often find that</p> <p>18 clients who come to Gherson require other services and</p> <p>19 are happy or want us to manage those legal services. So</p> <p>20 we act as a general counsel referring to other lawyers.</p> <p>21 So somebody could come to us with a tax problem and say,</p> <p>22 "We want you to oversee this" and we will instruct</p> <p>23 a firm of tax lawyers but assist the client as general</p> <p>24 counsel in dealing with those matters.</p> <p>25 Q. Were you retained by Mr Perepilichny to provide advice</p> <p style="text-align: center;">Page 32</p>

1 in respect of the Swiss litigation that you have
 2 adverted to?
 3 **A. He consulted me about an issue in Switzerland and**
 4 **I referred him to Swiss lawyers.**
 5 Q. Would that be Mr --
 6 **A. I don't practise in Switzerland.**
 7 Q. Would that be Mr Micheli, at Python & Peter I think is
 8 the name?
 9 **A. I would have to look up the firm name.**
 10 Q. Or Mr Weber, Horst Weber?
 11 **A. Correct, I referred him to Horst Weber.**
 12 Q. Can I go back to my original question, whether or not
 13 the litigation was civil or criminal.
 14 **A. It was a Swiss inquiry I believe by the Swiss**
 15 **prosecutor.**
 16 Q. But not connected with Hermitage is that, the Hermitage
 17 issue?
 18 **A. No.**
 19 Q. Thank you.
 20 Can you provide any other information about that
 21 litigation insofar as your privilege allows you to do
 22 so?
 23 **A. Not really. He had an issue in Switzerland, he asked me**
 24 **and I referred him to Swiss lawyers to deal with that**
 25 **issue. I believe there was subsequent correspondence**

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1 **with Browder and Pastukhov afterwards with Weber, I was**
 2 **copied with some mails but I was not involved in dealing**
 3 **with it.**
 4 Q. Did you get the impression that he wanted to be in the
 5 United Kingdom to avoid being prosecuted?
 6 **A. It is very difficult to give you an assessment on that.**
 7 **The Russians live in a different system. They operate**
 8 **with a completely different risk profile every day when**
 9 **they go to work. It is very difficult for someone**
 10 **working in this system with a system of law and order to**
 11 **give an impression of someone who lives in a completely**
 12 **different system. A Russian will get out of bed in the**
 13 **morning, get in his car, drive down to the end of the**
 14 **road and wait for a policeman to ask him for a bribe to**
 15 **go to work to get sorted out there. So their risk**
 16 **profile is completely different to the risk profile**
 17 **I have and any impression I make will be on the basis of**
 18 **my experience in the system I live in and not on the**
 19 **basis of their system.**
 20 **So I did not have the impression he was seeking**
 21 **refuge in the UK. Clients who normally are apprehensive**
 22 **about some sort of prosecution, legal action, et cetera,**
 23 **would come here and would not travel and they would be**
 24 **advised, if they are under threat, not to travel. And**
 25 **I understand this man travelled quite frequently, so it**

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1 **is somewhat of a contradiction to be seeking safe haven**
 2 **here but to be travelling freely.**
 3 Q. It is right I think that Mr Perepilichnyy did not seek
 4 any form of asylum or refuge here, his immigration
 5 status --
 6 **A. Not through my firm.**
 7 Q. Did you get any impression whatsoever from anything he
 8 communicated to you or anything you inferred from your
 9 contact with him that he had concerns about his safety?
 10 **A. Quite the contrary.**
 11 **As I said to you, I have dealt in this area for**
 12 **a number of years, when the Hermitage story came up he**
 13 **was offered the options to seek safety here, to seek**
 14 **protection here and he chose not to take that option,**
 15 **which is indicative of someone who doesn't want to**
 16 **engage with that type of relief.**
 17 Q. There are subtleties to someone's engagements with
 18 protection, it may be that some people simply don't want
 19 to live their life like that, notwithstanding they are
 20 at risk. Was Mr Perepilichnyy one of those sorts of
 21 people?
 22 **A. My experiences, notwithstanding the different cultures**
 23 **and I have dealt with complex matters from a number of**
 24 **countries from around the world with very diverse**
 25 **cultures, ultimately when people are in fear they tend**

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1 **to react the same way. If the level of fear is such,**
 2 **they will seek protection and the finer things in life**
 3 **of the boats, the toys and the other things, will go by**
 4 **the by when the fear issue gets to a certain level.**
 5 Q. That is a helpful generalisation, but in
 6 Mr Perepilichnyy's case do you think that was the case?
 7 That in fact the reason he wasn't living a life where he
 8 apparently used protection, we have seen no evidence of
 9 a bodyguard for example, that in fact he wasn't at risk
 10 or was he naive to that risk?
 11 **A. I do not believe that he had the fear for his life that**
 12 **the policeman says that I expressed on -- that**
 13 **I expressed. I have dealt with clients who have had**
 14 **worrisome encounters, whether they are rational or**
 15 **irrational and as a result of that I have made the**
 16 **requisite reports to the authorities. I have done it on**
 17 **a number of occasions. Mr Perepilichnyy never expressed**
 18 **that degree of fear, otherwise I would have made the**
 19 **appropriate report to the requisite authorities.**
 20 Q. Just seeking a little detail on that, you have had cause
 21 where clients have come in and said, "I believe I am
 22 under threat"?
 23 **A. Correct.**
 24 Q. Have you been instructed to make that phone call or have
 25 you of your own accord made that phone call --

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1 **A. No, if a client comes in, as I said to you they come**
 2 **with a different risk profile and clients come with**
 3 **different levels of worry. You take instructions, you**
 4 **unpack what the fear is, and if the fear is realistic**
 5 **you advise the client in no uncertain terms to make the**
 6 **appropriate report to the authorities.**
 7 Q. Would you ever make a phone call to the authorities --
 8 by which I think you mean the police, primarily --
 9 without instructions?
 10 **A. No. Because I have explained, it is the client's**
 11 **assessment of the fear, not my assessment of the fear.**
 12 Q. Going back to your instruction by Mr Perepilichny, were
 13 you instructed effectively by both Mr Perepilichny and
 14 Mrs Perepilichnaya?
 15 **A. Mrs Perepilichnaya was completely out of the picture in**
 16 **terms of the conferences, et cetera, she spoke little or**
 17 **no English and he conducted most of the matters, as far**
 18 **as I could see. I have Russian translators employed in**
 19 **my firm and on the rare occasions I met her before the**
 20 **death of her husband a Russian translator was present,**
 21 **she would have to come in to sign the application forms**
 22 **to deal with certain questions which come up on a normal**
 23 **Home Office form and she would do that through Russian**
 24 **translators.**
 25 Q. You were formally retained by her but in fact her

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1 day-to-day dealings were limited?
 2 **A. Correct.**
 3 Q. Was there any question when it came to deciding what
 4 kind of visa they required that it should be other than
 5 an investor visa?
 6 **A. When you are instructed in this area you have to assess**
 7 **the tax implications. You also have to assess the**
 8 **implications as to how much time the individual has to**
 9 **remain in the United Kingdom. If the goal is to get the**
 10 **firm -- the family permanent residency, then the**
 11 **principal applicant has to remain in the United Kingdom**
 12 **for 180 days per calendar year for the life of the visa.**
 13 **If you wish to obtain nationality subsequent to**
 14 **obtaining permanent residency, the applicant has to**
 15 **remain in the United Kingdom for 450 days out of the**
 16 **preceding five years. That is why in the case of**
 17 **international businessman who base their families here**
 18 **the applicants tend to make the application in the**
 19 **wife's name, because the wife will fulfil the time**
 20 **limits because she will be at school with the children**
 21 **et cetera. The immigration rules do not require that**
 22 **the dependents fulfil those time requirements, so you**
 23 **can have a husband who is travelling in and out who is**
 24 **non-resident for tax purposes but is able to achieve**
 25 **permanent resident status without being a principal**

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1 **applicant.**
 2 Q. I think it is right to say for your own reference that
 3 although you have not been here, that is evidence
 4 effectively which has been given to the court
 5 previously.
 6 **A. Correct.**
 7 Q. Was there any question though of you not going down the
 8 investor route and rather going into --
 9 **A. No, because the only other available options were**
 10 **establishing a business by investing £200,000 and**
 11 **employing two people. You need to have an English**
 12 **requirement for that, Mrs Perepilichnaya did not speak**
 13 **English, she was at home looking after the children so**
 14 **she would not fulfil the tier 2 work permit category.**
 15 **She was not going to be representing a foreign company**
 16 **in the United Kingdom, so the options were limited.**
 17 Q. What about asylum?
 18 **A. There was no request for asylum. There was no**
 19 **mention -- according to Vladimir Putin you turn up in**
 20 **the UK and you ask for asylum you get it wrapped in**
 21 **ribbon. That is not the reality. In order to establish**
 22 **asylum with the Home Office you have to exhibit a well**
 23 **founded fear of persecution, this family did not exhibit**
 24 **or make a request for asylum and did not give sufficient**
 25 **instructions to do that. Had they given instructions --**

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1 THE CORONER: Did it ever cross your mind?
 2 **A. No. I talked to him and offered him the option but he**
 3 **didn't want it. This is what I do.**
 4 MR SKELTON: Sorry, and just to clarify why you offered
 5 that, did you offer that because you always offer that
 6 to Russian clients or --
 7 **A. Sorry?**
 8 Q. Did you offer that because you always offer it to
 9 Russian clients?
 10 **A. No, I would not offer an investor asylum, he needs to**
 11 **have well grounds for that. This man came to the UK,**
 12 **the Magnitsky story developed, I saw him from time to**
 13 **time and we discussed the situation as to whether he**
 14 **wanted to change his status and he said no.**
 15 Q. Who initiated that discussion?
 16 **A. Sorry?**
 17 Q. Who initiated --
 18 **A. Me.**
 19 Q. You. Why?
 20 **A. Because he was involved in the Magnitsky story and he**
 21 **might want to avail himself of that option.**
 22 Q. Why, precisely?
 23 **A. Why? Because he may just wish to avail himself of that**
 24 **option.**
 25 Q. What does that option give him?

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1 **A. It gives him the ability to remain here as a refugee.**
 2 Q. To protect himself from what?
 3 **A. If a client comes to see you and you are aware of**
 4 **circumstances concerning his personal case, you are duty**
 5 **bound to offer him the range of options that exist at**
 6 **law and that is what I did.**
 7 Q. If he had been given refugee status rather than investor
 8 visa, would that have stopped him or prevented any form
 9 of extradition proceedings for example?
 10 **A. No, not necessarily.**
 11 Q. What does it offer in terms of protection that another
 12 visa doesn't?
 13 **A. A refugee status offers protection against extradition**
 14 **in certain circumstances, but it doesn't offer you**
 15 **a blanket cover against all criminal proceedings against**
 16 **you.**
 17 Q. Why did you think about it as being an option, what
 18 benefit did you think it might have for
 19 Mr Perepilichny?
 20 **A. Well, if -- the Magnitsky story was taking on a life of**
 21 **its own in Russia, and there was a calculated**
 22 **possibility that they may try to extradite him or they**
 23 **may take some action against him. That was purely my**
 24 **view and he was not interested.**
 25 Q. You appreciate why I am pushing you on this, Mr Gherson,

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1 it is a critical issue for the Inquest --
 2 **A. Not a problem.**
 3 Q. -- to assess this risk.
 4 When you said "they might take some action", did you
 5 think that the Russian state, which allegedly had some
 6 involvement in the fraud, might seek to initiate
 7 proceedings against Mr Perepilichny which, if he were
 8 not protected by his status in the UK, could be damaging
 9 to him?
 10 **A. The client was in the UK as an investor. This story**
 11 **with Magnitsky was taking on a complete life of its own**
 12 **for a number of reasons, there were vested interests by**
 13 **a lot of parties to promote the story. There are vested**
 14 **interests by the Magnitsky family to have justice for**
 15 **Magnitsky and there are a number of other parties who**
 16 **have a desire to fuel this Russian position, as we see**
 17 **in the press all the time.**
 18 **My purpose was to offer my client the options**
 19 **available to him, and as a lawyer who specialises in**
 20 **this field there was a possibility that the Russians may**
 21 **take action to try to extradite him. And if you apply**
 22 **for asylum prior to an extradition case arising and if**
 23 **you succeed in obtaining asylum, the extradition case**
 24 **will not proceed. If you are subject to extradition**
 25 **proceedings, you can make an application after the**

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1 **extradition proceedings have commenced and obtain the**
 2 **same protection, if you succeed. So I just offered the**
 3 **client the option and he wasn't interested.**
 4 Q. When did you offer that option?
 5 **A. It would probably have been around when he came in to**
 6 **renew the visa.**
 7 Q. To be clear, was that option put forward originally in
 8 2010?
 9 **A. No.**
 10 Q. It was only when you came to renew the investor visa
 11 that it was an issue?
 12 **A. When it was renewed in 2012, I think.**
 13 Q. By which stage the Magnitsky issue had --
 14 **A. Hold on, let me just check the dates, I don't want to**
 15 **mislead you.**
 16 Q. There was a visa application made I think in March 2010,
 17 which was granted in June 2010 and was valid until
 18 August 2012?
 19 **A. Yes.**
 20 Q. Just to clarify, when that application was made, there
 21 hadn't been any discussion of --
 22 **A. No.**
 23 Q. No suggestion of it?
 24 **A. No.**
 25 Q. When it came to be renewed, when would you have started

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1 that process?
 2 **A. It would have started probably around about June or**
 3 **July.**
 4 Q. Of 2012?
 5 **A. Yes, it usually starts two or three months before, I do**
 6 **not have the file and the dates.**
 7 Q. You offered or suggested there was another option other
 8 than renewing the investor visa?
 9 **A. Correct.**
 10 Q. What did he say precisely?
 11 **A. He proceeded with the investor visa.**
 12 Q. Did he say, "I am not worried about extradition" or he
 13 just said, "I am not bothered about that" or --
 14 **A. He didn't want the option, I can't recollect the exact**
 15 **words. The option was offered, he chose not to take it.**
 16 Q. Did you discuss with him his involvement with the Swiss
 17 proceedings, which by then he had become engaged with,
 18 I think he was interviewed in fact in April that year?
 19 **A. Not really. I mean I have clients who have actions all**
 20 **over -- I could have one client who could have**
 21 **proceedings in multiple jurisdictions. Unless I have**
 22 **a direct involvement or an instruction, or it reflects**
 23 **on a case I am doing here, I don't usually delve into**
 24 **it.**
 25 Q. What did he tell you about his involvement with the

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<p>1 Swiss prosecution?</p> <p>2 A. I told you before. He told me he had an issue in</p> <p>3 Switzerland. He needed a Swiss lawyer and I referred</p> <p>4 him to Horst Weber and let them get on with it. I was</p> <p>5 copied with emails but I did not delver into them or</p> <p>6 read them.</p> <p>7 Q. It may be me, but I had understood that the referral for</p> <p>8 the Swiss lawyer was about something other than the</p> <p>9 Hermitage issue?</p> <p>10 A. Yes.</p> <p>11 Q. But when he became involved -- when you realised he was</p> <p>12 involved with the Hermitage issue, what did he say about</p> <p>13 his involvement with that and the Swiss proceedings</p> <p>14 about that?</p> <p>15 A. As I said to you in my statement, he came to me, he</p> <p>16 asked me if I knew Browder. I said I knew Browder, he</p> <p>17 said he wanted to talk to Browder. I told him to take</p> <p>18 separate advice before he spoke to Browder and</p> <p>19 thereafter a meeting was arranged with Browder and they</p> <p>20 went off and did what they have got to do.</p> <p>21 Q. You told him to seek legal advice, did you?</p> <p>22 A. I told him to seek separate advice, yes.</p> <p>23 Q. From whom?</p> <p>24 A. He did not go into detail. He said he wanted to talk to</p> <p>25 Browder about the Magnitsky story et cetera and I said</p> <p style="text-align: center;">Page 45</p>	<p>1 Q. Is that the phrase, Magnitsky funds or the funds from</p> <p>2 the fraud --</p> <p>3 A. That is the phrase I am adopting before we get carried</p> <p>4 away, yes.</p> <p>5 Q. I understand.</p> <p>6 What did he say to you -- I am not asking specific</p> <p>7 conversations because I appreciate the information may</p> <p>8 have come out in dribs and drabs --</p> <p>9 A. Sure.</p> <p>10 Q. -- but I would like to know the totality of the</p> <p>11 information he gave you about his involvement?</p> <p>12 A. He came to see me, he asked me if I knew Bill Browder,</p> <p>13 I said yes, he said he wanted to meet Browder because he</p> <p>14 had information about the Magnitsky matter. I said to</p> <p>15 him he should seek separate legal advice and we left it</p> <p>16 at that.</p> <p>17 He then either called or popped in again and said he</p> <p>18 really wanted to meet them and I recollect that</p> <p>19 a meeting was set up with Pastukhov, I see Pastukhov</p> <p>20 infrequently/frequently and I remember a conversation</p> <p>21 subsequently where Pastukhov said to me they had met</p> <p>22 with Perepilichnyy and they had got a whole bunch of</p> <p>23 information from him. And that was that.</p> <p>24 Q. Were you told by Mr Perepilichnyy directly or</p> <p>25 Mr Pastukhov that Mr Perepilichnyy had some involvement</p> <p style="text-align: center;">Page 47</p>
<p>1 to him, "I am not qualified on this, you had better take</p> <p>2 independent advice" and he pushed for a meeting and he</p> <p>3 subsequently met Pastukhov and they dealt with what they</p> <p>4 had to deal with. I did not go to the meetings.</p> <p>5 Q. Just to slow down to understand the various elements to</p> <p>6 this.</p> <p>7 Did he seek advice as far, as you were aware?</p> <p>8 A. I have no idea. I just gave him the advice to seek</p> <p>9 advice.</p> <p>10 Q. Did you direct him anywhere in particular?</p> <p>11 A. No.</p> <p>12 Q. Did he tell you why he wanted to see Mr Browder?</p> <p>13 A. He said he had some information regarding the Magnitsky</p> <p>14 story.</p> <p>15 Q. Did he say what that information was?</p> <p>16 A. No.</p> <p>17 Q. Did he say he had some knowledge of where the funds</p> <p>18 went?</p> <p>19 A. Not at that meeting, no.</p> <p>20 Q. When did he say that?</p> <p>21 A. I had a subsequent meeting with him later, I recollect,</p> <p>22 where he said he had met Browder and he was giving them</p> <p>23 information regarding the Magnitsky funds and I believe</p> <p>24 Pastukhov told me that he had received some information</p> <p>25 from Perepilichnyy and met him.</p> <p style="text-align: center;">Page 46</p>	<p>1 in the movement of the proceeds of the fraud outside of</p> <p>2 Russia?</p> <p>3 A. The difficulty -- you are asking in hindsight after</p> <p>4 books have been written, which I have read, films have</p> <p>5 been produced on the internet. I can't recollect</p> <p>6 specifically whether the information was gleaned from</p> <p>7 that subsequent information that was put out there or he</p> <p>8 told me specifically. He told me he had involvement in</p> <p>9 the Magnitsky case and he wanted to meet Mr Pastukhov.</p> <p>10 The meeting was arranged. Mr Pastukhov told me, as</p> <p>11 I recollect, that he had got information from</p> <p>12 Perepilichnyy. I do not believe I delved into the</p> <p>13 information that was given, surprisingly, because I hear</p> <p>14 this stuff all day from different sources.</p> <p>15 Q. I was going to express some surprise, Mr Gherson,</p> <p>16 because it is one of your clients who got himself</p> <p>17 involved in a Swiss investigation into potential money</p> <p>18 laundering of a huge amount of money, \$230 million</p> <p>19 allegedly. Quite deep water for someone to find</p> <p>20 themselves in and I am wondering why you wouldn't have</p> <p>21 probed to get more information from either him directly</p> <p>22 about it or from Mr Pastukhov who you knew.</p> <p>23 A. It may cause you some consternation and surprise, I have</p> <p>24 acted for a considerable number of high net worth</p> <p>25 individuals that could fill this whole wall with</p> <p style="text-align: center;">Page 48</p>

1 litigation going on around the world and I do not delve
 2 into or go into material that does not impact directly
 3 on my cases in the UK. Or where I am instructed to
 4 assist them abroad. I have dealt with extradition cases
 5 abroad in a number of countries. In those situations
 6 I would look at the foreign material. Otherwise I have
 7 no cause to.

8 It will cause some surprise but this is what I have
 9 been doing for the last 20 years and if I started
 10 reading every proceeding that was going on today,
 11 I wouldn't finish it in five lifetimes.

12 Q. I do understand that but you have said you have read
 13 books --

14 A. Yes, Browder's book, I have scanned Browder's book.

15 Q. You have watched some videos I think you said or films?

16 A. He put some videos I saw a few years ago up on the
 17 internet, showing trucks and where people were going and
 18 stuff like that, yes.

19 Q. I think it is a reasonable inference from that level of
 20 interest in this issue that in fact you, even as
 21 a lawyer, will want to know a bit more about it, you did
 22 want to know a bit more about it?

23 A. I did tell you that I acted for a number of other people
 24 whose names I was not prepared to disclose, and it is
 25 a presumption that I was looking at out of general

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1 interest and not in connection with their particular
 2 matters.

3 Q. Were you looking because Mr Perepilichny had told you
 4 things about it and then you were seeing how it had
 5 played out in the public arena?

6 A. No, there are other people involved with this story
 7 where I have dealt with their cases and I have made
 8 submissions on their behalf and as a result of making
 9 those submissions I had to look at this information.

10 Q. Your reading of the book about the --

11 A. I scanned the book, I didn't say I read the whole book.

12 Q. Your scanning of the book about the fraud, the alleged
 13 fraud, your looking at videos was part of your
 14 professional obligations?

15 A. Yes, when you make an application in connection with
 16 a protection application for a Russian or FSU national,
 17 you may wish to put forward submissions regarding other
 18 matters that have occurred. As you will well know from
 19 having conducted this hearing the names of various FSB
 20 police officers have come up very prevalently in the
 21 Magnitsky case.

22 There is a trend with lawyers whenever these
 23 officers are now involved in investigating or are party
 24 to extradition proceedings to look at the Hermitage
 25 story, to look at the other stories involving these

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1 officers, collate the information and put that to the
 2 authorities that this is like a Magnitsky type story,
 3 that is the context in which you look at the other
 4 information.

5 Q. Have you had cause to rely on allegations around the
 6 Hermitage fraud and around Mr Magnitsky or indeed
 7 Mr Perepilichny in your professional capacity?

8 A. For Mr Perepilichny, no.

9 Q. Not in reference to him but in reference to Mr Magnitsky
 10 and the fraud?

11 A. Sorry?

12 Q. Have you had cause to rely on allegations made about the
 13 fraud and the death of Mr Magnitsky and other suspects
 14 involved with it?

15 A. Yes. In respect of other clients, yes.

16 Q. What did Mr Perepilichny tell you or what did
 17 Mr Pastukhov or indeed anyone else tell you about
 18 Mr Perepilichny's motivation for contacting the Swiss
 19 authorities?

20 A. I never discussed his motivation and was never informed
 21 what his motivation was.

22 Q. Did you have cause to give any form of advice, legal or
 23 non-legal, about those proceedings to him, about whether
 24 or not it was a wise idea for him to get involved with
 25 that kind of thing?

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1 A. All I told him is when he told me that he wanted to meet
 2 Browder about the Magnitsky case was to seek
 3 professional advice.

4 Q. Did he speak to you, this is Mr Perepilichny or indeed
 5 Mr Pastukhov, about the protagonists allegedly involved
 6 with that fraud, so Vladen Stepanov and his then wife
 7 Olga Stepanova, Dmitry Klyuev or Andrei Pavlov?

8 A. I know the name Pavlov, it has come up in a number of
 9 matters. It has come up in discussion with Pastukhov,
 10 I never discussed Pavlov with Perepilichny, Stepanova,
 11 the name came up I think through the media initially and
 12 one or two comments were made about Stepanova, I think
 13 she was a tax officer or the husband was a tax officer,
 14 one or the other. But I had no direct discussions with
 15 Perepilichny regarding Stepanova or Pavlov or Klyuev.

16 Q. Were you aware of the Russian Untouchables website?

17 A. Sorry?

18 Q. There is a website called Russian Untouchables which
 19 Mr Browder has set up --

20 A. I never looked at it.

21 Q. You have never looked at it.

22 Could you explain briefly, without going into
 23 unnecessary detail, how you came across Mr Pavlov's
 24 name?

25 A. Pavlov's name came up -- I can't remember if it was when

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<p>1 Micklethwaite was there or after but Pavlov's name has 2 come up in a lot of articles and a lot of material that 3 has been produced and it has been used as a defensive 4 mechanism in a number of cases, because he was 5 an investigating officer or an officer involved in the 6 Magnitsky case. 7 Q. Have you seen his name in the context of acting for 8 Dmitry Klyuev or his associates? 9 A. No. 10 Q. Are you aware of who Dmitry Klyuev is said to be? 11 A. No. 12 Q. Have you previously heard of him? 13 A. No, I might have heard the name but no. 14 Q. There has been a phrase used during the course of this 15 Inquest, the "Klyuev organised crime group". 16 A. Oh sorry, I have heard of Klyuev, apologies. It does 17 recollect with some flowcharts that have come back now. 18 Yes, I have heard of Klyuev, I have heard of his name 19 and I have heard of the organisation but I have not 20 delved into it, we have made reference to the name in 21 applications but I have not had long discussions with 22 Browder or Pastukhov or anybody on that stuff. 23 Q. The KOCG, for short, has been an organisation which has 24 been referred to repeatedly during the course of this 25 Inquest but outside of this Inquest is it recognised to</p> <p style="text-align: center;">Page 53</p>	<p>1 Pastukhov from time to time. Pastukhov made comment 2 that he had met with Perepilichnyy and was getting 3 information from him, I did not delve into the 4 conversations I did not attend their meetings, I did not 5 have notes of their meetings. 6 Q. Mr Pastukhov, at least on the internet, has a reputation 7 of being a critic of the existing Russian government. 8 A. Hmm. 9 Q. Did you get the impression from Mr Pastukhov that 10 Mr Perepilichnyy may have been motivated by a similar 11 kind of criticism? 12 A. No. I don't know what Mr Perepilichnyy's motivation 13 was -- his reasons were for coming forward with this, 14 but he obviously had reasons and he brought it forward. 15 Q. Has Mr Pastukhov ever told you what Mr Perepilichnyy's 16 reasons might have been? 17 A. He did not tell me his reasons. 18 Q. He did not? 19 A. No, Mr Pastukhov did not come to me and say to me, 20 "Mr Perepilichnyy brought me this information because of 21 1, 2, 3, 4 ..." He told me, "I have met with 22 Perepilichnyy, we have got significant information from 23 him". And I know subsequently what some of that 24 information was because the whole whistleblower story 25 came out, but I did not get it directly from</p> <p style="text-align: center;">Page 55</p>
<p>1 be an entity, a criminal entity? As far as you were 2 aware? 3 A. I would have to look up. 4 Q. Can I infer from that that you don't have a ready 5 recollection of hearing about that group previously? 6 A. I have a recollection -- you brought it back to me now. 7 You have to understand I do this all day every day and 8 there are loads of these things going on. I have 9 a recollection of Klyuev, I have a recollection of the 10 flowcharts, the banks, the organisations and I have 11 a recollection that they have called it an organised 12 crime network. Specific names I can't recollect. 13 Q. Mr Perepilichnyy did contact Hermitage, although I don't 14 think he ever met Mr Browder, certainly Mr Browder has 15 no -- 16 A. Met Mr Pastukhov. 17 Q. He met Mr Pastukhov and he met other Hermitage 18 employees, you were aware of those meetings? 19 A. Correct, I was aware of some of those meetings. 20 Q. Is your only awareness via Mr Pastukhov or were you told 21 by Mr Perepilichnyy about them? 22 A. Mr Perepilichnyy came to me, asked me to introduce him 23 to Browder, I told him to seek advice. He came back, he 24 wanted to meet Browder I put him in touch with Pastukhov 25 I am aware they had meetings afterwards. I meet</p> <p style="text-align: center;">Page 54</p>	<p>1 Mr Perepilichnyy or in detail from Pastukhov. 2 Q. What about since Mr Perepilichnyy died? 3 A. Sorry? 4 Q. What about since Mr Perepilichnyy has died? Obviously 5 his death has given rise to a considerable amount of 6 media concern. The Inquest, as you know, has been 7 a protracted process culminating in these hearings. 8 Have you had cause to speak to people that may have had 9 more direct knowledge about the circumstances of his 10 demise, such as Mr Pastukhov, that could give you cause 11 for concern? 12 A. The reason I called the police officer was I had some 13 knowledge of the Litvinenko case and it was to avoid 14 this type of situation. Whenever someone in a position 15 of a Russian or high profile emigre dies you will 16 inevitably get speculation as to the cause of death. 17 And I have no information from Mr Perepilichnyy as 18 to his fears about personal safety. As I have explained 19 to you, had he expressed those fears I would have 20 encouraged him or pushed him to make a report to the 21 police. 22 I have no information regarding the -- his death, 23 I called through a translator, because I explained to 24 you that his wife didn't speak English, on the Friday 25 evening on a routine matter. She explained he had died.</p> <p style="text-align: center;">Page 56</p>

<p>1 As a result of that, on the Friday evening I tried to 2 get hold of the coroner. 3 Q. Mr Gherson, I don't want to interrupt you because I know 4 this is an important evidence but I would prefer it if 5 I may to elicit it in stages rather than a single 6 narrative. It may be we ought to do so after a short 7 break for the stenographer's sake. 8 A. I understand the questions are being asked. I heard 9 Mr Drinkwater's evidence. All I can tell you is I had 10 no knowledge of this man's fear for his safety in terms 11 of a threat to kill him. The reason I called the police 12 is prior experience with Russian cases, that when 13 a significant individual involved in a high profile 14 story dies, it always leads to considerable speculation 15 as to the cause of death. I saw his wife on the 16 Saturday. She had explained to me he had dropped down 17 jogging, through a translator, and she also explained 18 that on the Friday evening, so I made what I thought 19 were the right calls to the coroner and the police to do 20 proper toxicology tests in order to find out the facts, 21 to ascertain whether the man had died from a heart 22 attack or from some ill-proper motive. That was the 23 sole purpose of my call to both Surrey Police on the 24 Friday evening, the coroner and to Scotland Yard who 25 were not interested and sent me back to Surrey Police.</p> <p style="text-align: center;">Page 57</p>	<p>1 record or recording of an incident at the police and 2 I recollect in 2012 that she had overheard him on the 3 telephone call discussing some difficult issues, she 4 didn't go -- he didn't go into it, with some people on 5 the phone and she expressed a fear -- 6 Q. Could you switch the phone off? Sorry, Mr Gherson, it 7 has to be completely off when you are giving evidence. 8 A. Sorry? 9 Q. Is that assisting you in hearing or is that -- 10 A. No, that was my hearing, yes. Sorry, I had to just 11 adjust it so I could hear you. 12 Q. Do you want to adjust it properly before -- 13 A. There is no "proper", I just have to move it as I go 14 ahead. Sorry about that, I know it is an inconvenience 15 but I have to hear the questions. 16 Q. No, no, it's fine. Sorry, I didn't know if you needed 17 some time to get it calibrated correctly? 18 A. I think we are okay now. 19 Q. Thank you. 20 You were saying -- can I just break down, there were 21 two things you referred to there. One is 22 Mrs Perepilichnaya's contact with the police, there is 23 no need to say in detail about why that contact took 24 place, but I think that took place in May -- 25 THE CORONER: We have been very scrupulous, I would just</p> <p style="text-align: center;">Page 59</p>
<p>1 That was the subsequent call to Drinkwater on the 2 Sunday, and that was the sole purpose. 3 MR SKELTON: Thank you. 4 I will come back to that after the break. Thank 5 you. 6 THE CORONER: Please will you be very careful not to talk to 7 anybody about your evidence in the break. Usual rule. 8 A. Sure, no problem. 9 (11.46 am) 10 (A short adjournment) 11 (12.06 pm) 12 MR SKELTON: Mr Gherson, just to go back a step before we 13 come on to the conversation you had with a police 14 officer after Mr Perepilichny's death, at any time 15 prior to that point -- 16 A. Sorry, I just need to turn this thing up. I can't hear 17 very well. 18 Yes. 19 Q. Did Alexander Perepilichny tell you at any stage that 20 he was fearful for his safety in any way? 21 A. Sorry, I didn't hear, apologies. 22 Q. Did Mr Perepilichny tell you he was fearful for his 23 safety in any way? 24 A. No. We had a discussion -- there was an incident 25 involving his wife, which was that led to a police</p> <p style="text-align: center;">Page 58</p>	<p>1 make it plain, about not saying more than that, have we, 2 that there was some contact. I just make it plain to 3 everybody. 4 MR SKELTON: We have, sir, on the grounds that it is 5 irrelevant for these purposes. 6 THE CORONER: Yes. 7 MR SKELTON: Mrs Perepilichnaya had some contact with the 8 police in 2011, around May time. Did you have cause to 9 talk to Mr Perepilichny around that time, ie in 2011, 10 about that contact and the possibility that the police 11 therefore would know Mr Perepilichny's address. 12 A. I have to look at my statement to recollect the date but 13 if you say it was 2011, if that is what I said, yes. 14 His wife was concerned after overhearing a conversation. 15 Q. There are two things, and I am trying to work out if 16 they are actually connected or whether or not in 17 retrospect you were thinking they are connected. Were 18 you aware in 2011 that there had been contact with the 19 police database? 20 A. No. I was aware of the reference -- let me just look at 21 my statement to see the date and then I can confirm to 22 you. 23 Q. I think it is paragraph 22. 24 A. Yes. 2012. 25 Q. Yes.</p> <p style="text-align: center;">Page 60</p>

1 **A. That is the only contact I know of.**
 2 Q. You are clear, are you now, that at the time that the
 3 incident occurred which led to the address becoming
 4 known to the police, that you were not contacted at that
 5 stage in 2011, it was subsequently some time in 2012?
 6 **A. I recollect what I have said in this statement.**
 7 Q. You say it would have been 2012?
 8 **A. Correct.**
 9 Q. Was it prompted by the overheard conversation?
 10 **A. Correct.**
 11 Q. Who came to speak to you about it?
 12 **A. Mr Perepilichny called me. As I explained to you,**
 13 **Mrs Perepilichnaya did not speak English so I wouldn't**
 14 **have had the contact with her, it was not through**
 15 **a translator. Mr Perepilichny called me and said that**
 16 **he was worried that he or his wife, I can't recollect**
 17 **the exact wording were worried that people would be able**
 18 **to get hold of their domestic address from the police**
 19 **and I said to him:**
 20 **"Well why are you worried about that? The police**
 21 **have systems to protect that and if someone wanted to**
 22 **find your address they could find it very easily, they**
 23 **don't have to go through the police to find it."**
 24 **And he agreed that his address could be ascertained**
 25 **but I had the feeling that he wanted the call made to**

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1 **placate his wife.**
 2 Q. What was the threatening call that had precipitated this
 3 discussion?
 4 **A. He did not discuss it with me, he just said that his**
 5 **wife was concerned having overheard a phone call which**
 6 **he had with some people, that she was worried that they**
 7 **would make approaches to find out his address through**
 8 **the police computer. It seemed to me an irrational**
 9 **comment, because if you want to find out someone's**
 10 **address who is living in England with a wife and**
 11 **children, you don't have to go to all those lengths to**
 12 **find out their address.**
 13 Q. If he was so relaxed about this matter, why did he even
 14 bother to initiate it with you and initiate contact with
 15 the police directly to alert them to that fact?
 16 **A. I am not aware of what goes on in domestic situations**
 17 **and what husbands do to placate wives or children or**
 18 **anything else but he did agree with me that if someone**
 19 **wanted to find out his address they could find it out**
 20 **without going through the police computer.**
 21 THE CORONER: My note is you said he wanted you to make the
 22 call to placate his wife.
 23 **A. Well that is the feeling I had, because I said to him it**
 24 **is unlikely that anyone would get access to the police**
 25 **computer and if someone wanted to find out your address,**

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1 **they can easily find it out without having to go to all**
 2 **that trouble.**
 3 MR SKELTON: Did Mr Perepilichny give you any detail of
 4 the --
 5 **A. No.**
 6 Q. Sorry, the conversation that his wife had overheard --
 7 **A. No.**
 8 Q. -- did he give you any detail of it?
 9 **A. No.**
 10 Q. Did he say that it was a conversation in which he,
 11 Mr Perepilichny, may have been under some form of
 12 pressure or threat?
 13 **A. He said that his wife overheard a conversation that he**
 14 **was having with some people and his wife was concerned**
 15 **that those people would be able to get his address from**
 16 **the police computer, because she had had an incident**
 17 **which had resulted in a police report which meant that**
 18 **their address was noted on the police computer.**
 19 Q. What people?
 20 **A. Sorry?**
 21 Q. What people?
 22 **A. He didn't say.**
 23 Q. Did you ask him who might want to find such information?
 24 **A. No.**
 25 Q. Were you aware of any reason why people outside of the

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1 UK might want to find --
 2 **A. As I explained to you earlier, in my experience, as**
 3 **having worked in this area for many years, Russian**
 4 **businessmen deal in different ways with their**
 5 **competitors and with other people and, as I said to you,**
 6 **if I have ever received a call from a client where he**
 7 **has indicated that he has a threat to his personal**
 8 **safety or that of his family, I would encourage and**
 9 **insist that he made a report to the police. That was**
 10 **not this situation.**
 11 Q. Who did you call?
 12 **A. I believe I called -- I believe I called the police**
 13 **station where the incident occurred. I do not have**
 14 **a note.**
 15 Q. Surrey Police, the local police?
 16 **A. I think so, yes.**
 17 Q. By this stage, he would have been living in the house
 18 where he was living at the time of his death?
 19 **A. In order to come back to you with a firm answer I would**
 20 **have to call my office and find out which police station**
 21 **the incident was at.**
 22 Q. Do you know who you spoke to?
 23 **A. No, I will have spoken to the duty officer or someone**
 24 **concerned with the case.**
 25 Q. What did you say?

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<p>1 A. I would have said that the client has -- I don't 2 recollect the wording of the conversation, I would have 3 said that there is a client who had this incident and 4 she was concerned that people would get access to the 5 police computer and get the name and the guy -- I just 6 made the report. I was asked to make the report, I made 7 the report. 8 Q. What was the response from the police? 9 A. I don't recollect. 10 Q. Did you make a note of the call? 11 A. No. 12 Q. Why not? 13 A. I just didn't. 14 Q. Given that it was -- I mean would you ordinarily as 15 a lawyer make a phone call on behalf of a client to the 16 police without making any record of it whatsoever? 17 A. Not normally. Normally I do attendance notes but on 18 that instance I can't find that I made a note. I can go 19 back and have a further look but I don't recollect 20 having a note. 21 Q. Have you looked already for the purposes of this 22 hearing? 23 A. I think we have looked through everything but I can look 24 again. 25 Q. Thank you.</p> <p style="text-align: center;">Page 65</p>	<p>1 A. My -- I can't say more than I have said in this 2 statement. 3 Q. Mrs Perepilichnaya herself has said that there may have 4 been a misunderstanding about the conversation that she 5 recalls being overheard and that in fact it might have 6 been someone else who was being threatened, not her 7 husband. 8 A. I can't comment; I have not discussed it with her. 9 Q. You have not discussed it with her? 10 A. No. 11 Q. Can I just show you the attendance note of a meeting 12 that took place -- 13 A. Well it is referred to in the attendance note when the 14 police were there, but that was not a discussion it was 15 a talk with the police. 16 Q. Can I just show you it and then, just to clarify -- 17 A. Yes. 18 Q. You have seen the attendance note I think, it was taken 19 by one of your -- is this a secretary or a lawyer, 20 Ms Turner? 21 A. It would have been probably a secretary in the office. 22 Q. It is dated Thursday, 29 November 2012 at your offices. 23 A. Yes. 24 Q. It takes the form not of a sort of narrative but 25 actually of a to and fro in terms of dialogue between</p> <p style="text-align: center;">Page 67</p>
<p>1 I think you said that Mr Perepilichny himself was 2 not concerned by this? 3 A. As I said to you. Again, if he had expressed a concern 4 about it I would have encouraged him to make a formal 5 report to the police regarding what the concern was, 6 et cetera, et cetera, but he did not express a concern 7 about it. He gave me the impression he was trying to 8 placate his wife. 9 Q. It may be -- one doesn't want to overread wording of 10 a statement but in your statement you say: 11 "Mrs Perepilichnaya had overheard a conversation in 12 which her husband had received what might have been 13 threats [plural]." 14 Is that simply a sort of slip of the wording or do 15 you mean a threat or do you not know? 16 A. It is probably just the wording. I don't recollect the 17 extent of -- I don't recollect if it was multiple 18 threats or a threat. 19 Q. You say in your statement it is about people knowing his 20 address. Was there any question that it was anyone 21 else's address or any other person involved? 22 A. Sorry? 23 Q. Was there any question in your mind that the threats 24 which had been overheard were to do with 25 Mr Perepilichny's address?</p> <p style="text-align: center;">Page 66</p>	<p>1 the various people who are talking. At the bottom of 2 page 8 you can see KB, who is one of the family liaison 3 officers, Ms Button, asked the question: 4 "Do you know of anyone who might want to hurt or 5 harm him?" 6 Mrs Perepilichnaya says: 7 "Now when I read the newspaper things I wonder. 8 I can't tell you that he discussed anything with me, he 9 was really protective. I was the one who was worried 10 and was always complaining." 11 Just stopping there, did Mrs Perepilichnaya 12 elaborate on that? 13 A. Sorry? 14 Q. Did Mrs Perepilichnaya ever elaborate on her concerns? 15 A. No. 16 Q. At no stage during your contact with her? 17 A. I had had very few -- I had seen her very, very few 18 times prior to this meeting with the police. As 19 I explained to you, the only times I had encountered her 20 was when she had come into the office to sign the 21 application forms and she did not at this time speak 22 very good English, as I recollect. This was 23 a conversation with a policeman in the office. This is 24 what she said. And she never elaborated, we never 25 discussed this afterwards as I recollect.</p> <p style="text-align: center;">Page 68</p>

<p>1 Q. There was reference to, "I was the one who was worried", 2 worried about what? Did you ever ask? 3 A. No. 4 Q. She never said? 5 A. No. 6 The woman was very distraught, she had been kept 7 completely out of the client's life. He had died 10 8 days beforehand. She was very, very concerned to 9 arrange the burial at the earliest opportunity. As 10 I recollect the daughter was in a state of tremendous 11 shock, the son was in a state of shock, and this was the 12 conversation with the police and at my offices and you 13 can see it finished rapidly at the end because she had 14 to leave because she was worried about her children. 15 Q. Yes. Just taking it in stages, she then refers to the 16 conversation, do you believe now that that is the same 17 conversation that had precipitated your phone call? 18 A. I do. 19 Q. She is referring to a conversation in which she heard 20 not long ago: 21 "He didn't know I was there [that is 22 Mr Perepilichny], he was talking to someone in Russia, 23 somebody was trying to pressure him and they said they 24 know where the children are living, they know the 25 address."</p> <p style="text-align: center;">Page 69</p>	<p>1 I made or was told about a threat other than this, so 2 I must make that assumption but there might have been 3 more, I don't know. 4 Q. When you were listening to her describe this, was there 5 any ambiguity, bearing in mind the previous conversation 6 you had had with Mr Perepilichny, that the threat was 7 to him and not to someone else? 8 A. If you turn over the page, my response at the time 9 was -- 10 Q. This is the top of page 9? 11 THE CORONER: Yes, top of page 9. 12 A. When this happened he asked me to speak to the police, 13 she was concerned that people in Russia had access to 14 the Met Police files so through her record they could 15 get the address. That is what I said on the phone, he 16 indicated to me that she felt they had access. I passed 17 on the message. 18 MR SKELTON: Yes, I understand that but going back to my 19 point, the reason I raise this is because 20 Mrs Perepilichnaya has disputed the fact that this, she 21 overheard a conversation which her husband was being 22 threatened. Her evidence is there has been 23 a misunderstanding and in fact it was somebody else that 24 was being discussed. Did you ever have that -- 25 A. No, I mean this is a record of the conversation that was</p> <p style="text-align: center;">Page 71</p>
<p>1 Reference to the children is quite a threatening 2 thing to say, isn't it? 3 A. Correct. 4 Q. "That is what I heard him talking to someone about. He 5 was saying [I think this is Mr Perepilichny again] it 6 is so easy to find out (The address). 7 "How could it be so easy ..." 8 Then she says: 9 "After I got ..." 10 Then you can see the rest of that sentence. 11 At this stage as far as you were concerned on your 12 understanding of what Mrs Perepilichnaya was saying, was 13 she saying Alexander was being threatened not long ago 14 by people who said they knew the address of him and the 15 family? 16 A. That she says here, this is a note taken down of what 17 she said. It is not a repetition of what I said. This 18 is as close as you are going to get to a verbatim note 19 of a secretary taking it. It says what it says. It is 20 not my words, it is her words. 21 Q. I do understand that, but as far as you were concerned, 22 does that accord with your recollection? 23 A. I believe so. The call was made in 2012. This note is 24 recorded some six, five months later or whenever and 25 this is what she said. I know of no other call that</p> <p style="text-align: center;">Page 70</p>	<p>1 taken on the telephone -- a record of the conversation 2 was taken when the police came, thereby as close as you 3 are going to get to an independent translator, that is 4 the record, there is nothing I can add. 5 Q. What she goes on to say is a remark where it appears 6 that her husband was blaming her for coming to the 7 attention of police: 8 "... because it is now easy for anyone to find us 9 through the police ways." 10 As is put there. 11 A. When I spoke to him, my recollection is -- as I said to 12 you earlier -- that if you have a man living in the 13 United Kingdom with two children attending school, it 14 will not require a genius to find out where they are 15 living and you would not have to hack the 16 Metropolitan Police computer to achieve that result. 17 Q. That may be right, it may be a misplaced concern but 18 I am just trying to work out if it was legitimately 19 held. 20 A. Exactly, that is why I concluded I thought he was trying 21 to placate his wife. 22 Q. If you go on through the conversation though that is 23 recorded here, as you say verbatim it seems, Ms Button 24 says: 25 "He was concerned about this?"</p> <p style="text-align: center;">Page 72</p>

<p>1 So he, Mr Perepilichnyy, on page 9, just after the 2 passage that you mentioned: 3 "He was concerned about this?" 4 Mrs Perepilichnaya: 5 "Yes. 6 "When was this discussion? 7 "Early summer, maybe late spring." 8 Then she says: 9 "He was really protective of us, the children and 10 me." 11 Here she is saying in fact my husband was concerned. 12 It is not for you to arbitrate on marital communications 13 I do appreciate that but did you get the impression 14 actually that she was saying in fact my husband was 15 concerned? 16 A. You are talking to a woman whose husband has died seven 17 or eight days previously, who is on the verge of being 18 hysterical, breaking down in tears with two children 19 outside in various places being brought by drivers 20 et cetera, being interviewed by the police with her sole 21 preoccupation of getting the body released so she could 22 bury her husband -- for religious reasons they are 23 supposed to be buried within a specific period of time. 24 This is what she said, this is what was written 25 down. I can't add.</p> <p style="text-align: center;">Page 73</p>	<p>1 A. Yes. 2 Q. Had you heard any similar or received any similar form 3 of information threatening voicemails, texts, Skype 4 communications, or the like, prior to the death? 5 A. No. 6 Q. When Mr Perepilichnyy moved, which I think is around the 7 summer of 2011 -- 8 A. Yes. 9 Q. -- do you recollect whether that move was connected with 10 a wish to change house so that the police didn't know 11 the latest address? 12 A. That was never told me to me. I was not consulted about 13 the move of the house, I was not informed, my office 14 would have been told through one of the assistants 15 because most Russian nationals have a duty to change 16 their address with the police, you have a police 17 registration certificate which registers your address 18 with the police, so moving house is not going to hide 19 the address from the police. 20 Q. The latest address, presumably the address where you are 21 living needs to be up to date on the -- 22 A. Correct, within seven days. 23 Q. Can I ask you about the life insurance policies. 24 A. Yes. 25 Q. A lot of evidence has been elicited during the course of</p> <p style="text-align: center;">Page 75</p>
<p>1 Q. Does it accord with your understanding? 2 A. This is the note that was written down. I said in my 3 statement that he called me and told me that she had 4 a concern that people would find the address from the 5 Metropolitan Police computer and I said, as I recollect, 6 as I would say that to anybody: 7 "Why would they have to go that far, you have got 8 a wife and two kids living in England?" 9 And he agreed with that, is what I said in my 10 statement, and therefore it is somewhere between the 11 two, you have got the wife travelling on that thought 12 pattern, the guy travelling on that thought pattern, 13 what happens between a couple, who knows? 14 Q. As you can see, the conversation goes on. You in fact 15 assist the FLOs in asking Ms Perepilichnaya, it may be 16 because she is distressed or she had some trust in you 17 which assisted -- 18 A. We did not discuss the contents of this note or the 19 cause of these calls, et cetera, et cetera, ever again 20 as I recollect. 21 Q. The conversation, as you have seen from the attendance 22 note which I think you are familiar with, goes on to 23 discuss other things which in fact you prompt 24 Mrs Perepilichnaya to talk about, for example 25 a voicemail that was received after her husband's death?</p> <p style="text-align: center;">Page 74</p>	<p>1 this Inquest about that and we know that 2 Mr Perepilichnyy within a relatively short period of 3 time obtained £3.5 million worth of life insurance and 4 was making enquiries with a view potentially to securing 5 a further £5 million, all around the May/June period of 6 time before his death. Were you aware of any of those 7 applications? 8 A. No. 9 Q. Did he discuss with you the need to protect his family 10 financially in the event of his death? 11 A. No. 12 Q. After Mr Perepilichnyy's death, when did you first 13 become aware of that as a fact? 14 A. As I explained earlier, and I will do it slowly. We 15 called the wife on a routine matter through a Russian -- 16 well, we called his house, not the wife, we called his 17 house on the Friday evening on a routine matter. The 18 wife answered the telephone, so someone who spoke 19 Russian took the call because she didn't speak English. 20 She was hysterical and said the husband is dead, the 21 police have taken the phones away, I didn't have your 22 number, I had no way to get in contact with you. Thank 23 you for calling, et cetera et cetera. 24 And then I got one of the girls who had dealt with 25 the immigration matters who spoke Russian to speak to</p> <p style="text-align: center;">Page 76</p>

1 her and to try and get bordering on a calm response from
 2 her as to what happened. She said he died, from
 3 recollection I think the 10th or whatever date it was
 4 in November --
 5 Q. Again, it is more helpful if I can break it down.
 6 I certainly don't want to stop you giving things that
 7 are relevant but the date of that I think you said in
 8 your statement is paragraph 6, was around the 16th?
 9 **A. I believe it was Friday the 16th.**
 10 Q. Thank you.
 11 So you made contact for routine reasons?
 12 **A. It was routine matter, chasing up something.**
 13 Q. You obviously found a family in a great deal of distress
 14 and Mrs Perepilichnaya distressed?
 15 **A. Correct.**
 16 Q. Was it you who made that contact?
 17 **A. No, as I said to you I got an assistant to call up. It**
 18 **was a routine matter, the woman answered the phone and**
 19 **then one of Russian assistants took over because she**
 20 **didn't speak English.**
 21 Q. You were told of the death around the 16th?
 22 **A. Yes.**
 23 Q. You were personally told?
 24 **A. Yes.**
 25 Q. You didn't speak to Mrs Perepilichnaya yourself at that

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1 stage?
 2 **A. No, no, he was dead.**
 3 Q. Mrs --
 4 **A. I didn't speak to Mrs, the assistant called up, Mrs**
 5 **answered the phone, she didn't speak English so**
 6 **a Russian assistant took the call and she said the**
 7 **husband had died.**
 8 Q. Did you speak to Mrs Perepilichnaya at that stage?
 9 **A. No, she doesn't speak English.**
 10 Q. Well I have spoken to her in English.
 11 **A. She speaks English now. At that time she was**
 12 **a housewife who had never engaged in English**
 13 **conversation with me at the meetings at the office and**
 14 **she has learnt a lot of English and learnt a lot about**
 15 **the way of life since I actually had the first proper**
 16 **meeting with her on Saturday the 17th, when I attended**
 17 **the house to pay my respects. Even at that time she**
 18 **didn't speak English very well.**
 19 Q. Sorry. The conversations that we have seen transcribed
 20 in your note, just after her death, in fact that is your
 21 assistant translating into English as the conversation
 22 is going along to make the note?
 23 **A. Sorry?**
 24 Q. The conversation that we have seen transcribed, at that
 25 stage she is not actually speaking in English is she?

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1 **A. No, there was a Russian translator there translating.**
 2 Q. For the FLOs?
 3 **A. Yes.**
 4 Q. You say in your statement that at that stage you had --
 5 in fact you say you still have, absolutely no reason to
 6 believe that Mr Perepilichny's death was suspicious.
 7 That is your wording; is that right?
 8 **A. Correct.**
 9 Q. But if you knew about the alleged fraud, the Hermitage
 10 fraud, you knew about Mr Perepilichny's involvement
 11 with Bill Browder --
 12 **A. Yes.**
 13 Q. -- and with the Swiss prosecuting authorities as
 14 a witness of some kind --
 15 **A. Correct.**
 16 Q. -- and you knew about Sergei Magnitsky, who died in
 17 mysterious to say the least circumstances, is it not
 18 an obvious potential inference that he died suddenly and
 19 suspiciously?
 20 **A. This causes me great concern. They are all lawyers**
 21 **here. You all take cases to the Court of Human Rights**
 22 **on Article 6 and fair trial. Before you reach**
 23 **an assessment that someone has been killed you have to**
 24 **look at the evidence and that was the purpose of the**
 25 **telephone call to the police, to do the toxicology**

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1 tests. I am not a doctor. I wasn't there, I didn't see
 2 how the guy died. We have to look at evidence before we
 3 reach conclusions. What is happening consistently in
 4 these cases with people connected to Russia and other
 5 countries is immediately something happens there is
 6 a splurge of press confirming the guy's death.
 7 Now, I am not an idiot. There is a man who is
 8 involved with this call with Russia, with Magnitsky,
 9 with Browder. There is a distinct possibility that he
 10 has been murdered. But is that is a far cry from
 11 investigating the evidence to reach that conclusion.
 12 Because the consequences of reaching that conclusion
 13 have effect on world policy, national governments and
 14 huge ramifications for everybody, including everybody's
 15 children in here.
 16 So you need to look at the facts. The purpose of
 17 the call to the policeman was to do the toxicology tests
 18 to find out if the guy was killed or he was not killed.
 19 It is that simple.
 20 Q. I will come back to your thinking in a bit more detail
 21 but I am just trying to work out. You said it was
 22 distinct possibility. If it is a possibility, that is
 23 the same as saying it is potentially suspicious, isn't
 24 it?
 25 **A. If someone gets knocked over on a bicycle, it is**

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1 a possibility the driver did it or it is a possibility
 2 it is his mistake. In every situation you need to get
 3 to the facts.
 4 Q. But if a --
 5 A. The facts here needed to do proper toxicology tests.
 6 The man had not been shot, he had not been run over by
 7 a car, he had fallen over while jogging. He could have
 8 had a heart attack or he could have been poisoned. The
 9 purpose of the call to the police was not to impart the
 10 police with information, the purpose of the call to the
 11 police was to conduct the tests as quickly as possible
 12 in order to avoid a huge hoo-ha and masses of
 13 speculation about why this man died.
 14 Q. Were you instructed to make that phone call?
 15 A. Sorry?
 16 Q. Were you instructed to make that phone call?
 17 A. No. I did discuss with Mrs Perepilichnaya that I would
 18 contact the police and the coroner, because she gave me
 19 the numbers. And she did not specifically say, "Please
 20 call them" but I said that I would contact them and she
 21 said okay.
 22 Q. You I think wrote an email to Mr Dando on
 23 13 December 2012. Do you have a copy of that in front
 24 of you?
 25 A. 13th?

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1 Q. 13 December 2012?
 2 A. Yes you gave me a copy I think.
 3 Q. Yes, timed at 15.46.
 4 You say there:
 5 "Thank you for your mail I spoke to DS Drinkwater on
 6 Friday, 16 December 2012 ..."
 7 We will come back to that date ...
 8 A. That is an error.
 9 Q. Yes, it may well be, thank you.
 10 It is an error on your part?
 11 A. I didn't speak to Drinkwater on Friday the 16th,
 12 I recollect -- and I have a very good recollection of
 13 this -- that I called Surrey Police, the policeman name
 14 she gave me, there was no answer to the phone. I called
 15 the coroner, there was no answer to the phone. I called
 16 Scotland Yard to try and engage with someone there, they
 17 said you have to speak to Surrey Police. On the day
 18 afterwards I don't recollect calling the police at all
 19 on the 17th. I went to see her at her house and then
 20 I had some other meetings on the Saturday and
 21 Drinkwater's note says I spoke to him on the 17th,
 22 I have some issues about the timing because I took
 23 a flight to New York that day.
 24 Q. You did, and I think you have provided very helpfully
 25 the timings of the flight.

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1 A. I have the visa stamp or the stamp when I arrived in
 2 New York and I have a flight reservation which was at
 3 4.00 in the afternoon, so if I took that flight --
 4 I might have taken an earlier flight, highly unlikely --
 5 a later flight, highly unlikely I took an earlier
 6 flight. But I know that I was present at the meeting at
 7 9.00 the next meeting in New York.
 8 Q. Coming to the corollary of all of that, does that mean
 9 you probably did make the phone call on Sunday the 18th?
 10 A. I believe I made the call on the Sunday the 18th, but it
 11 would not have been at 21.57, it wouldn't have been
 12 an hour before. It would have been in the afternoon
 13 because I would have left for Heathrow for a 4.00 flight
 14 probably at about 2.30.
 15 Q. Yes, I think DS Drinkwater said it could have been about
 16 an hour before and the call was about 8.56 or so?
 17 A. Well, I was on a plane to New York then.
 18 Q. You are sure you were --
 19 A. Here is my passport you can see the stamp of arrival in
 20 New York. If you calculate the latest flight arriving
 21 in New York, it would not have been possible I think to
 22 leave Heathrow at 9.00 -- I mean I tried to find the
 23 boarding pass, I couldn't find it, all I could find was
 24 the reservation slip saying 4.30.
 25 Q. I have seen that, but it is some time in the afternoon?

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1 A. Yes, probably.
 2 Q. Can I just take you back to that email which I asked you
 3 to look at, dated the 13th. The date is wrong but there
 4 you can see what you are recording about the phone call:
 5 "You had found out Mr Perepilichny was died and
 6 asked him [DS Drinkwater] to ensure that detailed
 7 toxicology tests were conducted. He said this was up to
 8 the coroner. He informed me that because of the Data
 9 Protection Act he could not give me any information and
 10 he did not know who I was."
 11 Although in fact we can see that he --
 12 A. Sure, if we go back to the circumstances. I tried to
 13 report this to the coroner, Surrey Police and
 14 Scotland Yard on the Friday night. No one was
 15 particularly interested. I recollect that I might have
 16 left voice messages on mobile phones of those officers
 17 but I can't say specifically. I was getting ready for
 18 a trip to New York on the Sunday. I was in a rush to
 19 go, so I made the call to Mr Drinkwater. My
 20 recollection was, is, he said "Who are you?"
 21 I said:
 22 "My name is Roger Gherson, I am a solicitor for the
 23 Perepilichny family and I am calling you up because the
 24 man has died and I believe you need to make very, very
 25 detailed toxicology tests because of his involvement in

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1 **the Magnitsky case."**
 2 **I wouldn't -- I don't recollect, I mean maybe I did,**
 3 **I wouldn't have said he was involved in the Magnitsky**
 4 **fraud because that is not an accurate portrayal of it.**
 5 Q. You are speeding ahead again, Mr Gherson. I am sorry to
 6 slow you down a bit.
 7 **A. Ask me, yes.**
 8 Q. I need to first of all just go back to the circumstances
 9 which led to the call, because that is quite important.
 10 **A. The circumstances that led to the call were I was still**
 11 **concerned to ensure that the matter was investigated**
 12 **properly in order to ascertain whether the man had died**
 13 **of natural causes or there was some misfeasance.**
 14 Q. What this letter appears to be saying, in that first
 15 paragraph and then in the last paragraph on that page,
 16 is that Mrs Perepilichnaya authorised you to make the
 17 call. You say in your own email, at the bottom
 18 sentence:
 19 "I had only a limited mandate given to me at the
 20 time of Mr Perepilichny's death to communicate on
 21 behalf of Mrs Perepilichnaya the need for toxicology
 22 tests."
 23 **A. Right, but let's take the time sequence, we are talking**
 24 **about initial calls which were initiated with telephone**
 25 **numbers given to her -- given to me by her on the Friday**

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1 evening and you asked me: was I specifically authorised
 2 to make the call in terms of the specifics? I said no,
 3 but she did say give me the numbers to call the police.
 4 By Sunday I had already been to her house on the
 5 Saturday afternoon, to pay my respects to her, and
 6 I engaged in a conversation with her on the Saturday
 7 afternoon. And I presume at that point got her
 8 authority to make the call.
 9 Q. Why did she want you to make the call?
 10 **A. Sorry?**
 11 Q. Why did she want you to make the call?
 12 **A. She wanted to know, I believe, what was going on but the**
 13 **predominant thing is she wanted to bury her husband and**
 14 **she wanted the body released.**
 15 Q. Did she think that her husband's death could have been
 16 the result of --
 17 **A. Sorry?**
 18 Q. Did she think or suspect there was a possibility her
 19 husband had been murdered?
 20 **A. I did not discuss that with her, I went to her house,**
 21 **she was deeply distressed. I went to pay my respects**
 22 **and tell her I am sorry. It is not a client that I knew**
 23 **very well. I had had little interaction with her.**
 24 **I went with an assistant who spoke Russian. She was in**
 25 **a terrible state, as I recollect, crying, the kids were**

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1 **there. There were other people coming in and out of the**
 2 **house, she lived in I think St George's Hill where there**
 3 **are quite a lot of Russians around there, I don't know**
 4 **who was there and not there, there were a few other**
 5 **people there. And I did not discuss whether her husband**
 6 **had been murdered or not, no.**
 7 Q. You may not have discussed it, did you get the
 8 impression that she thought that might have happened?
 9 **A. No, I mean I got the impression of a very hysterical**
 10 **woman who had been sheltered in the UK for a number of**
 11 **years and didn't know at all what was going on in her**
 12 **life.**
 13 Q. You see there are two potential reasons which I think
 14 you have posited as to why the call might have been
 15 made.
 16 One is to allay suspicion.
 17 One is to speed up the release of Alexander's
 18 Perepilichny's body so that it could be buried.
 19 **A. The first call I made on the Friday, before I had seen**
 20 **the woman, was to get to the truth of what was behind**
 21 **this man's death, to ascertain the facts and to get**
 22 **proper toxicology tests done. I made that call on the**
 23 **Friday to Surrey Police, the coroner and to**
 24 **Scotland Yard.**
 25 **On Saturday I went to the woman's house, I did not**

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1 **know about the religious implications of a quick burial,**
 2 **I did not know that it was something required within**
 3 **their religious beliefs and she was:**
 4 **"What is going on? The police aren't telling me**
 5 **anything, I need to know what is going on, I want to**
 6 **bury my husband."**
 7 **That is my recollection.**
 8 Q. Can you see why telling the police about the Magnitsky
 9 affair and Mr Perepilichny's involvement with it and
 10 asking the police to initiate toxicology testing to see
 11 if he was poisoned is in fact creating a line of inquiry
 12 which gives rise to suspicion rather than allays it?
 13 **A. So how do you deal with a situation where someone who is**
 14 **in this type of situation dies? You don't make the**
 15 **call, you just leave it alone, the extensive toxicology**
 16 **tests are not done. We would still be here. The**
 17 **purpose of asking the police to do is was to try and**
 18 **avoid the huge furore.**
 19 Q. On your argument you were never going to avoid the huge
 20 furore, are you, you are just pre-empting it? You are
 21 creating it?
 22 **A. I am not a criminal pathologist, I do not have access to**
 23 **the information. It just seemed to me, rightly or**
 24 **wrongly, that if someone dies in circumstances where it**
 25 **could be suggested that there is misfeasance, that if**

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1 you do the requisite chemical tests in a very, very
 2 short space of time after death, the opportunity for
 3 speculation will be limited.
 4 Q. Isn't the real reason that you or your clients thought
 5 he might have been murdered and you wanted to make sure
 6 the police were aware of that possibility?
 7 A. Why -- if I believed that the man was subject to
 8 threats, if he had told me he was subject to threats, if
 9 he told me that there were people trying to kill him,
 10 I would tell you.
 11 He didn't tell me. That is it.
 12 Q. There is no mention in your email, is there, of
 13 conspiracy theories and seeking to allay them, you are
 14 simply asking for further testing on conferring that is
 15 request?
 16 A. Correct.
 17 Q. There is no mention of Litvinenko, for example?
 18 A. Sorry?
 19 Q. There is no mention of Litvinenko?
 20 A. I said to the policeman on the phone that I wanted to
 21 avoid a Litvinenko type scenario where there is a lot of
 22 speculation, et cetera, et cetera. I am not
 23 a conspiracy theorist because probably I couldn't do
 24 this job having worked in this area for 25 years,
 25 I would be mad.

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1 The bottom line is I look to the facts of the
 2 circumstances and it seemed to me where a man is
 3 concerned with the Browder story, with Magnitsky, that
 4 there would be a tremendous amount of speculation that
 5 his death had been caused by misfeasance.
 6 So I therefore took the view that the logical thing
 7 was to call the authorities, to conduct all available
 8 tests, and if those tests showed that he was not
 9 poisoned, then the conspiracy theorists would have
 10 a harder job.
 11 If you leave the toxicology material and don't do it
 12 to the extent it should be done, you will be left with
 13 endless speculation that the poisons have gone through
 14 his body or whatever goes on. So it seemed to me
 15 logical that you should just deal with it in order to
 16 ascertain the facts. That was the purpose of the call
 17 to the police. Find out the facts. Give the facts to
 18 you guys and you make a decision.
 19 Q. Can you see in DS Drinkwater's note, the officer's
 20 report, reference to Mr Perepilichny's concerns for his
 21 own safety in recent weeks?
 22 A. Yes, well I hadn't seen him in recent weeks so
 23 I couldn't have expressed the concern.
 24 Q. When had you last seen him?
 25 A. I believe from my records I had seen him -- I would have

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1 seen him, I don't actually even think I saw him when he
 2 came in to collect the passports for the renewing of his
 3 visa in August. Because -- let me just look at
 4 a date ... sorry, my papers have got a bit confused
 5 here.
 6 Yes ... (Pause)
 7 I spoke to him in early part of the 2012 with the
 8 telephone call. The visa was renewed in February.
 9 I don't recollect seeing him when he collected the
 10 passports, when the visa was actually stamped in there
 11 and the card was given. And I have no telephone record
 12 or meeting record of anything as I recollect from June,
 13 July, August around that time to November.
 14 Q. When was the conversation that you had about the
 15 overheard conversation which precipitated?
 16 A. About?
 17 Q. When was the conversation about the overheard threat?
 18 A. I recollect that was some time in 2012, the earlier
 19 part. I have to look up when the criminal case arose.
 20 Q. Might you have been referring to that?
 21 A. When?
 22 Q. The concern, when you refer to concerned about his own
 23 safety, leaving aside the timeframe that you referred
 24 to, might that have been what you are referring to?
 25 A. No, because he did not express a concern about his

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1 safety. He said his wife was concerned that people
 2 would find the address and, as I explained to you, if he
 3 had expressed a concern about his safety I would have
 4 encouraged him to make a report to the police, as I have
 5 done for other clients.
 6 Q. Is it the case that you went too far in speaking to the
 7 police about that matter and then became defensive when
 8 the police started to probe you?
 9 A. No, the call said, "Please do extensive toxicology
 10 tests". The purpose of the call was to find out the
 11 information about how the man died. The policeman, as
 12 I tried to explain to you before when you cut me off and
 13 I explained to you how the call went, I called him up
 14 and I said to him:
 15 "I am the family lawyer for Perepilichnyy, the man
 16 has died, involved in the Magnitsky story, in order to
 17 avoid a Litvinenko type situation you need to conduct
 18 full toxicology tests."
 19 I tried to get hold of the coroner, tried to get
 20 hold of police on Friday, nobody wants to hear to be it.
 21 All he kept saying to me is:
 22 "Who are you? How do you know all this
 23 information?"
 24 I said:
 25 "My name is Roger Gherson, I am a solicitor, you can

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1 **look me up on the internet, you can see my page on the**
 2 **website, I have dealt in this area of law for many years**
 3 **and in order to avoid a huge furore you need to do the**
 4 **toxicology tests."**
 5 **I did not discuss the guy's frame of mind, his fears**
 6 **for his personal safety and that is my recollection of**
 7 **the call.**
 8 **And I did not have any information in which to**
 9 **express his fears for his personal safety and I had**
 10 **certainly not seen him in recent weeks.**
 11 Q. You do see though, Mr Gherson, that the contemporaneous
 12 note, written it appears on the day by the officer, the
 13 DS, who had no real knowledge of Mr Perepilichnyy,
 14 beyond what he found out on that day, as you heard this
 15 morning, has written:
 16 "Mr Gherson is concerned ... stated as a result of
 17 these issues Mr Perepilichnyy has been concerned for his
 18 own safety in recent weeks."
 19 And then goes on to say:
 20 "When I asked further questions regarding why
 21 Mr Perepilichnyy felt concerned for his safety,
 22 Mr Gherson became defensive."
 23 **A. I did not become defensive. I was fed up at trying to**
 24 **make a report to the authorities. The bloke was just**
 25 **concerned with who I am and why I knew the information.**

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1 **Instead of taking down what he took down, he said to**
 2 **you, as I recollect in his evidence, that he had not**
 3 **seen, which counsel directed to him, the email from**
 4 **Brown Rudnick on 17 November in the evening setting out**
 5 **the Magnitsky story on behalf of Mr Browder.**
 6 **He said during his evidence, if I recollect -- there**
 7 **is a transcript, if I am wrong I apologise -- that while**
 8 **he was on the call he looked things up on the computer.**
 9 **So I don't know how much he took from the system, how**
 10 **much he didn't take from the system. I am absolutely**
 11 **convinced that had I believed that Mr Magnitsky -- that**
 12 **Mr Perepilichnyy had been killed, I would have made much**
 13 **more strenuous efforts to bring it to the attention of**
 14 **the authorities on Friday and Saturday.**
 15 **I was purely concerned that proper toxicology tests**
 16 **should be done in order to find out the truth in this**
 17 **matter, in order to avoid wild speculation.**
 18 Q. To clarify, were you told by Mrs Perepilichnaya not to
 19 go any further than requesting toxicological tests of
 20 the police?
 21 **A. No.**
 22 Q. When you say at the last sentence of your email to
 23 Mr Dando:
 24 "I had only a limited mandate given to me at the
 25 time of Mr Perepilichnyy's death to communicate on

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1 behalf of Mrs Perepilichnaya the need for detailed
 2 toxicology tests."
 3 One cannot infer from that that there was more
 4 information which was being withheld?
 5 **A. No, I found out about this death on that evening.**
 6 **I then took professional advice, I am a general counsel**
 7 **immigration lawyer, I am not a criminal lawyer involved**
 8 **in these specific areas or a probate lawyer. I felt the**
 9 **woman should get additional advice on what she wanted to**
 10 **do if she wanted to do anything when she calmed down and**
 11 **that is why I had a limited mandate until I brought**
 12 **other lawyers or advisers in, which subsequently came in**
 13 **and dealt with her probate and other stuff, which was**
 14 **not dealt with by me.**
 15 Q. When speaking with DS Drinkwater did you at any stage
 16 exert data protection privilege or legal professional
 17 privilege?
 18 **A. No, he said to me that there were data protection issues**
 19 **and other issues he could not discuss with me, matters**
 20 **about the case. He also said, "I don't know who you**
 21 **are", and I repeat I said to him, "My name is**
 22 **Roger Gherson, I am an immigration lawyer, I have dealt**
 23 **with the family, I have a website, this is my phone**
 24 **number, this is my address".**
 25 **He does not explain -- he is the police for goodness**

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1 **sake, I am sure the police if they had any interest**
 2 **could find out if my mobile number was real and he could**
 3 **call me back on my mobile number if he had an issue.**
 4 **I had given him the number.**
 5 Q. One point of detail on the previous phone calls, or
 6 phone call, you had made to Surrey Police while
 7 Mr Perepilichnyy was alive --
 8 **A. Around that time.**
 9 Q. Yes, it just getting the date right. We have seen
 10 evidence that it appears that Mr and Mrs Perepilichnyy
 11 moved house in the summer of 2011.
 12 **A. Yes.**
 13 Q. I am trying to work out when you may have made the phone
 14 call about the address being known?
 15 **A. You would have to release me to go and make a call.**
 16 **I would need to find out when her -- when the report was**
 17 **made to the police.**
 18 Q. It appears that she became known to the police around
 19 May 2011 and in fact they moved house a couple of months
 20 later, around the end of --
 21 **A. I don't recollect it being in 2011. I will have to go**
 22 **back to my office and see where I got the 2012 date for,**
 23 **but I assume I got it from somewhere and that is why it**
 24 **is in the statement.**
 25 Q. Likewise you will check for any notes of the phone calls

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<p>1 that we discussed beyond --</p> <p>2 A. We have checked, but I will look again.</p> <p>3 Q. Thank you.</p> <p>4 You I think had a follow-up conversation with</p> <p>5 Detective Constable Burden, do you remember that?</p> <p>6 A. You can draw my attention to it, if you wish, yes.</p> <p>7 Q. Yes, if you look in -- it is in one of these bundles, if</p> <p>8 you have not seen it recently, it is in bundle 2,</p> <p>9 police, someone will assist you with.</p> <p>10 A. Where should I go? Which one?</p> <p>11 Q. Page 374, I think it is under tab 22.</p> <p>12 A. I will have to borrow someone's glasses to read this.</p> <p>13 Q. There may be --</p> <p>14 A. Okay.</p> <p>15 Q. Can you read it, Mr Gherson? I don't want to put you in</p> <p>16 difficulties, I think that would be unfair. I have</p> <p>17 a copy with bigger print if that would help.</p> <p>18 A. Which paragraphs are we talking about?</p> <p>19 Q. On page 374, there is a note, it is actually underneath</p> <p>20 a date of 10 November but in fact the entry is in fact</p> <p>21 at 22 November, and it starts with the words:</p> <p>22 "On Wednesday, 21 November, contact received from</p> <p>23 Roger Gherson ..."</p> <p>24 About two-thirds of the way down.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 97</p>	<p>1 went off and instructed others, Peter Binning and</p> <p>2 elsewhere, but I understood that she was contacted after</p> <p>3 his death by other parties. Or people calling or</p> <p>4 whatever.</p> <p>5 Q. She has told Mr Gherson that some people said to her</p> <p>6 they know where she and the kids live, this is her being</p> <p>7 contacted --</p> <p>8 A. Correct.</p> <p>9 Q. -- after Mr Perepilichny's death --</p> <p>10 A. Correct.</p> <p>11 Q. -- in a way which made her concerned?</p> <p>12 A. Yes.</p> <p>13 Q. You have confirmed here that you say, after that:</p> <p>14 "Mr Gherson confirms no specific threats have been</p> <p>15 made."</p> <p>16 Are you referring to threats to her and the family?</p> <p>17 A. Yes, correct.</p> <p>18 Q. Not to Mr Perepilichny prior to his death?</p> <p>19 A. Correct, as I recollect. But this is a note, I do not</p> <p>20 have a note, he has a note. As I said to you, I do not</p> <p>21 know of any specific threats that Mr Perepilichny felt</p> <p>22 gave cause for concern. He did not communicate any</p> <p>23 specific threats to me.</p> <p>24 Q. I have focused in my questions on what you were aware of</p> <p>25 from your discussions with Mr Perepilichny and</p> <p style="text-align: center;">Page 99</p>
<p>1 Q. It says:</p> <p>2 "Including consent form signed by Mrs Perepilichnaya</p> <p>3 giving Surrey Police authority to disclose information</p> <p>4 to Gherson & Co, solicitors acting on her behalf.</p> <p>5 Mr Gherson states the deceased male,</p> <p>6 Alexander Perepilichny, is involved in the</p> <p>7 investigation of the death of Sergei Magnitsky, who died</p> <p>8 in Russian custody. He states Mrs Perepilichnaya is</p> <p>9 very distressed and worried about other incidents and</p> <p>10 she has told Mr Gherson that some people said to her</p> <p>11 they know where she and the kids live."</p> <p>12 Now, Mrs Perepilichnaya's evidence to this court was</p> <p>13 that, beyond the issues that we have already gone</p> <p>14 through, which is the overheard conversation that</p> <p>15 occurred before Mr Perepilichny's death, after his</p> <p>16 death, there was a furore which she suddenly found</p> <p>17 herself the centre of, the victim of, where she was</p> <p>18 being doorstepped and contacted by the media and she</p> <p>19 became fearful and felt oppressed by that. Is that what</p> <p>20 you are talking about here or are you adverting to the</p> <p>21 possibility that she knew about other threats prior to</p> <p>22 his death?</p> <p>23 A. My recollection is that he had other business interests</p> <p>24 and there were interested parties who raised their heads</p> <p>25 after his death, and I know no more than that. She then</p> <p style="text-align: center;">Page 98</p>	<p>1 Mrs Perepilichnaya insofar as that took place and others</p> <p>2 such as Mr Pastukhov prior to Mr Perepilichny's</p> <p>3 death --</p> <p>4 A. Yes.</p> <p>5 Q. -- is there any information that you have come to know</p> <p>6 about, not speculation, but information, since</p> <p>7 Mr Perepilichny's death that supports the conclusion</p> <p>8 that his death was connected to the Hermitage fraud or</p> <p>9 that he was otherwise murdered?</p> <p>10 A. I've read some of the newspaper reports regarding this</p> <p>11 Inquiry. I saw one report which suggested that he may</p> <p>12 have had a toxin in his body, but other than that I have</p> <p>13 not been imparted with any information other than what</p> <p>14 is in the media and the speculation out there that his</p> <p>15 death was caused by his involvement in the Magnitsky</p> <p>16 story.</p> <p>17 Q. Understandably, Mr Gherson, you are a cautious lawyer</p> <p>18 and no lawyers we know like to give evidence in court --</p> <p>19 A. I love it, yes.</p> <p>20 Q. -- is it fair to say, but have you been given any</p> <p>21 information beyond that contained in your statement,</p> <p>22 beyond that that we have seen in a contemporaneous</p> <p>23 document and beyond that that I have elicited during the</p> <p>24 course of my examination that may be relevant to the</p> <p>25 coroner's inquiry into how Mr Perepilichny died?</p> <p style="text-align: center;">Page 100</p>

1 **A. I have not been given any information, no one has told**
2 **me anything about this. There has been speculation in**
3 **the Russian community with clients et cetera, as there**
4 **is with all these cases, as to whether this man was**
5 **murdered or whether he died of natural causes.**
6 MR SKELTON: Thank you.
7 Sir, it is a couple of minutes to 1.00. It is
8 whether you want to rise early and start early or crack
9 on?
10 THE CORONER: The only thing that just occurs to me is this,
11 is there any mileage in ordinarily -- I am not sure this
12 would necessarily count as talking about his evidence to
13 anyone, but is there any mileage in us having the break
14 now so that if there is anything Mr Gherson can get hold
15 of, I mean he has spoken about other queries he might
16 make.
17 MR SKELTON: Sir, I think that is a --
18 **A. I can carry on or we can break, I don't mind.**
19 MR SKELTON: The learned coroner is saying is it possible to
20 make enquiries of contemporary notes that might be
21 available over the lunchtime break.
22 **A. I will try. I mean we have looked but I will try again**
23 **to see if I can find some information.**
24 MR SKELTON: I think, sir, I think that would be helpful.
25 If those inquiries cannot be completed there is

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1 unfortunately a little something to be held over.
2 THE CORONER: Quite, but certainly a start might be made.
3 I know it is a double check but there would be no harm
4 would there if we used the time now.
5 If we break off until 2.05.
6 (12.57 pm)
7 (The Luncheon Adjournment)
8 (2.20 pm)
9 MR SKELTON: Mr Gherson, before the lunchtime break you
10 indicated that you were going to go and initiate some
11 checks. I understand that those have been conducted
12 over the lunchtime, for which I am grateful.
13 **A. I did check on a couple of matters and I have produced**
14 **an additional attendance note which was retrieved and**
15 **which I have given you a copy of.**
16 **I would just like to make a couple of housekeeping**
17 **clarifications, if I may.**
18 Q. Please.
19 **A. I indicated in my statement that we were instructed by**
20 **them in 2002. It appears from records we were**
21 **approached in 2002 on the question of an investor visa,**
22 **an engagement letter was issued, it was never executed**
23 **by the client and matters then died down until we were**
24 **contacted again in 2009, regarding opening the issue of**
25 **the investor visa application again. At the time**

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1 Mrs Perepilichnaya and the daughter were residing in
2 Switzerland, where I understand from my office that is
3 where the application was made from, and the son was
4 studied in the UK. And we have no record to suggest
5 that we dealt with the son's student visa application.
6 **That is on that score.**
7 Q. Thank you.
8 **A. I keep diary notes and telephone record, systems have**
9 **changed but as far as I can ascertain, again checking at**
10 **my office, there is one error in my statement in terms**
11 **of the date of the incident, if that is the reference**
12 **time to the reference of the call. The incident that**
13 **occurred with her happened in May 2011. I was called by**
14 **him in June 2011 and I met with him in July 2011, where**
15 **I suggested that he change the lawyers that were dealing**
16 **with the wife's matter. And those are the records that**
17 **I have with respect to the meetings with him, having**
18 **done another search again today.**
19 Q. Do you think it is from July or around July 2011 that
20 you made the call?
21 **A. It is possible, as I said to you, for better or for**
22 **worse, I do not have attendance notes, I don't know if**
23 **I made them or if they have been deleted but I recollect**
24 **that the incident with the wife prompted the call.**
25 Q. It is -- if you had to --

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1 **A. It is conceivably possible that it is 2011 and I made**
2 **an error when I said 2012 because I thought the incident**
3 **with the wife was in 2012.**
4 Q. Is it more likely to be 2011?
5 **A. Correct, I was travelling at the time, I asked my staff**
6 **is to put it together and get me the facts. I have now**
7 **gone back and checked it again with the person**
8 **responsible and it was May 2011, not 2012.**
9 Q. Thank you.
10 Is it your recollection then that that ties in in
11 2011 with the threatening phone call?
12 **A. Yes, that is my recollection. That it was around the**
13 **time of the incident, I was mistaken with the**
14 **information as to the date of the incident.**
15 Q. Thank you.
16 Can I ask, have you checked for an attendance note
17 of your contact with Surrey Police?
18 **A. I have had them check extensively now in the 45 minutes**
19 **they have had, they had checked in the last couple of**
20 **weeks and we have not found anything more other than**
21 **this note. I will again check over the weekend but**
22 **I think that is what we have had.**
23 Q. Would you expect to have made a record of a call like
24 that, given its potential seriousness?
25 **A. I don't always make attendance notes, I deal with**

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1 serious cases all the time and I don't make
 2 an attendance note of every call I make to Home Office
 3 or police.
 4 Q. In respect of the calls that you placed on and after
 5 16 November, over that Friday and then on the weekend,
 6 on the Sunday, we have seen the 18th, you have not
 7 located any --
 8 A. As I said to you, on the Sunday I was leaving for
 9 New York, I was frustrated -- which is again reflected
 10 in the latest attendance note that I have given to you
 11 at the lack of response from the authorities, and the
 12 call was made to impart the information that they should
 13 do proper toxicology tests to avoid a Litvinenko
 14 situation and I did not consider that you needed to make
 15 an extensive attendance note of that call. I was purely
 16 putting the police on notice that I thought they needed
 17 to look into this matter extensively.
 18 Q. We can see on the attendance note that you have provided
 19 just now, this is a record of a telephone call from
 20 Seema Taylor, one of the FLO --
 21 A. I think she may have been one the policemen that came to
 22 the office.
 23 Q. She was, she came to the office I think on --
 24 A. She was one of the policewomen who came to the office on
 25 29 November.

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1 Q. Yes, and I think possibly again on the 30th, in fact,
 2 because you had a -- there were text messages and things
 3 that were being translated at that stage.
 4 A. Correct.
 5 Q. She calls you on the 30th and you can see from the final
 6 substantial paragraph on that page you say:
 7 "I told them that when I found out about this on the
 8 Friday evening, I got through to the police finally and
 9 I told them that this was a serious matter. I also
 10 contacted the coroner on the Tuesday and told him that
 11 this was a serious matter and needed to be looked into.
 12 I repeated that I had not made a big issue of the fact
 13 that the police had ignored it until this week."
 14 A. Yes.
 15 Q. Can I just clarify, was it your concern that unless you
 16 told the police about the Magnitsky issue they would
 17 think this was just an ordinary death?
 18 A. No, my concern, as again -- one of the gentlemen at the
 19 back smiled when I said it, you are dealing with very,
 20 very important issues here. The ramifications of this
 21 case has worldwide implications at government level and
 22 across the board and I, having practised in this area
 23 for many years, wanted to ensure that the correct facts
 24 were ascertained in order to find out if this man had
 25 died of natural causes or had died because of some

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1 wrongful act. We have seen the effect of the Magnitsky
 2 legislation, we have seen the effect of the heightening
 3 of the tension between the different powers. These
 4 cases involve much more major issues than this chap, and
 5 all I wanted to do from the benefit of my years long of
 6 experience was to ensure that the proper facts were
 7 ascertained.
 8 I had no knowledge of any action being taken against
 9 this man. He had not expressed the fear for his life to
 10 me. The sole purpose of calling the police was to get
 11 them to investigate the matter properly so that they
 12 could come forward and tell us here today either he had
 13 been murdered or he hadn't been murdered. That was the
 14 sole purpose of the call.
 15 Q. Can I finally ask you about an issue which you mentioned
 16 in your evidence earlier this morning as well --
 17 A. Yes.
 18 Q. -- which is the contact you had with DC Burden, in which
 19 you explain that Mrs Perepilichnaya had felt threatened
 20 after her husband had died.
 21 A. Correct.
 22 Q. What were those threats, as far as you were aware?
 23 A. She did not explain the threats. I went to her house on
 24 the Saturday and expressed my condolences to her and she
 25 did not discuss anything about her husband's death,

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1 about the reasons for the death, but she said people
 2 were contacting her. She didn't say more than that.
 3 And the effect of my conclusion from the
 4 conversation she had about people contacting her is that
 5 the husband had business relationships and businesses
 6 going on and that people were getting in touch with her
 7 with respect to those issues.
 8 Q. To be clear, that is an inference that you drew rather
 9 than something which she told you. Is that right?
 10 A. Yes, on one occasion she did mention that there was
 11 a relative or someone who was handling these matters for
 12 her because there were people trying to talk to her,
 13 trying to discuss with her.
 14 Q. That might have been her brother, Mr Ismagilov who we
 15 have heard had some --
 16 A. Quite probably, yes.
 17 Q. Thank you.
 18 To be clear though, was there any suggestion that
 19 the pressure that she was being put under or the threats
 20 were in any way connected with the Hermitage issue or
 21 the Swiss prosecution?
 22 A. No.
 23 MR SKELTON: Thank you.
 24
 25

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<p>1 Questions from MR MOXON BROWNE 2 MR MOXON BROWNE: Mr Gherson, I learn, I think for the first 3 time, from this attendance note of 30 November that you 4 were able to obtain over the luncheon adjournment -- do 5 you have a copy with you? Yes. That on the Tuesday 6 after your conversation with Mr Drinkwater on Sunday the 7 18th, so 19th/20th, that you made as I understand it 8 direct contact with the coroner? 9 A. Correct. 10 Q. That is Mr Travers at Woking? 11 A. Correct, he wanted a letter of authority sent to him 12 from the wife, which we arranged to be sent. 13 Q. Yes. Do you recall that conversation with Mr Travers? 14 A. No, I believe -- well, I do not have a note of the 15 conversation. I believe I would have expressed the same 16 information I expressed to the police, that they had to 17 do detailed toxicology tests to establish the cause of 18 death. 19 Q. You were now saying directly to the coroner that you 20 felt that -- 21 A. I explained to you earlier, if you recollect, that the 22 wife gave me the coroner's telephone number on the 23 Friday evening and I called the coroner and I called 24 Surrey Police on the Friday evening in order to express 25 the same message.</p> <p style="text-align: center;">Page 109</p>	<p>1 Q. You are not anymore? 2 A. No. 3 Q. Do you know who is? 4 A. I believe at one stage Seton somebody? Yes. 5 Q. That is as far as you can say at the moment? 6 A. Yes. 7 Q. Yes. 8 You mentioned in connection with the claim, I am 9 sure a well founded claim for privilege in relation to 10 Alexander Perepilichny's estate, that there was nobody 11 for you to consult with regard to a waiver because 12 Mrs Perepilichnaya had not applied for a grant of 13 probate, nor was she an administratrix of the estate? 14 A. I sought professional advice and that was the advice 15 that was given. 16 Q. Yes, I am sure is that absolutely correct, but what was 17 the source of your information that Mrs Perepilichnaya 18 had not obtained a grant of probate? Who told you that, 19 may I ask? 20 A. I believe we would have asked at the time. I don't know 21 if she has obtained it now. 22 Q. In your witness statement you say that you are unable to 23 discuss what you were told or not told by 24 Alexander Perepilichny -- 25 A. I had not been informed that a grant of probate had been</p> <p style="text-align: center;">Page 111</p>
<p>1 Q. Yes, but my understanding is that you didn't actually 2 get to speak to the coroner -- 3 A. Not the Friday evening. 4 Q. -- on the Friday, and according to this note it was on 5 the Tuesday? 6 A. If that is what the note says, yes, correct. 7 Q. It does. 8 What I want to get at is this, that you were 9 conveying to the coroner the same kind of concerns that 10 you had earlier conveyed to Mr Drinkwater? 11 A. Correct. 12 Q. That was obviously -- you were approaching now not 13 a police officer but a senior official figure, you 14 didn't make any note of that conversation? 15 A. No. 16 Q. No. 17 You mentioned that in 2012 you were the 18 Perepilichny's family lawyer? 19 A. From -- I said earlier, I think. From when we did the 20 investor visa, from 2010 I believe. 21 Q. Do you still regard yourself as the family lawyer? 22 A. What today? 23 Q. Yes. 24 A. For the limited retainer I had in respect of the 25 investor visa, it has come to an end.</p> <p style="text-align: center;">Page 110</p>	<p>1 obtained. 2 Q. Well, had you been informed it had not been obtained? 3 A. No, but I had been informed up to the last time when I 4 checked, I believe, that it hadn't been obtained. 5 I think a year or so ago. 6 Q. Yes, thank you. 7 I just want to put that, if I may, into context by 8 looking at a couple of documents. Could you take the 9 insurance bundle which is bundle 7 or could you be given 10 that. 11 A. What page? 12 Q. It is page 129 of bundle 7, which is a letter dated 13 19 March 2013 to an insurance company called Aviva, who 14 were one of Mr Perepilichny's life insurers, from 15 a firm called Woolf Simmonds. 16 A. I yes. 17 Q. I see that Woolf Simmonds have the same postal address 18 as you do, 1 Cumberland Place? 19 A. Not anymore, they moved out a couple of years ago. 20 Q. A couple of years ago, but they were at that time in the 21 building? 22 A. Correct. 23 Q. Were they in any way affiliated with your firm? 24 A. Not at all, there are a number of lawyers in that 25 building.</p> <p style="text-align: center;">Page 112</p>

<p>1 Q. Yes, I was aware of that.</p> <p>2 Did you use to refer work to them because they</p> <p>3 were --</p> <p>4 A. Yes, I believe I introduced her to them. I introduced</p> <p>5 her to them.</p> <p>6 Q. You introduced her. That is what I was wondering. Is</p> <p>7 there a link between Woolf Simmonds and Seddons, as far</p> <p>8 as you know?</p> <p>9 A. No idea.</p> <p>10 Q. You will see Mr Simmonds of Woolf Simmonds is writing to</p> <p>11 Aviva saying:</p> <p>12 "We refer to previous correspondence and now enclose</p> <p>13 declaration and consent form signed by the deceased</p> <p>14 widow, is also the intended administratrix of the</p> <p>15 estate."</p> <p>16 Then over the page, do you see the form, page 130,</p> <p>17 and you will see that the claimant is Ms Perepilichny,</p> <p>18 "Relationship to life assured: widow/intended</p> <p>19 administratrix".</p> <p>20 I don't know whether your family work practice, to</p> <p>21 the extent you have one, extends to knowledge that if</p> <p>22 a life insurance policy is not written in trust --</p> <p>23 A. No idea whatsoever.</p> <p>24 Q. -- then it goes to the estate?</p> <p>25 A. No idea.</p> <p style="text-align: center;">Page 113</p>	<p>1 Could you please then look at a document called D165</p> <p>2 which is in bundle 5, I think probably volume 1, it is</p> <p>3 page 230. Page 230 in the bottom right-hand corner.</p> <p>4 A. I will get there, don't worry.</p> <p>5 Q. This is apparently a document produced by SOCA, I think</p> <p>6 that is Serious Organised Crime Agency, dealing with</p> <p>7 contacts with yourself and with Mr Browder and Hermitage</p> <p>8 and others from 2008 onwards. I just want to ask you</p> <p>9 about some of those entries, in view of the evidence you</p> <p>10 have given.</p> <p>11 Do you have the document?</p> <p>12 A. Sure. Where are you talking about?</p> <p>13 Q. Down the left-hand side in bold we have dates. The</p> <p>14 first date I want to take you to is the first, which is</p> <p>15 23 May 2008, which says:</p> <p>16 "Formal letter of representation from Gherson</p> <p>17 Solicitors to SOCA on behalf of Browder, asking SOCA to</p> <p>18 make representations to Interpol ..."</p> <p>19 A. Sorry, I have lost the page, page 230?</p> <p>20 THE CORONER: 230, bottom right.</p> <p>21 A. 213?</p> <p>22 THE CORONER: No, 2-3-0.</p> <p>23 A. Yes.</p> <p>24 MR MOXON BROWNE: The first entry relates to, which is</p> <p>25 23 May 2008:</p> <p style="text-align: center;">Page 115</p>
<p>1 Q. No idea about that.</p> <p>2 I can take this then I think very quickly, there is</p> <p>3 similar correspondence with London Victoria, who are</p> <p>4 saying, "Look, we cannot deal with you, we have to deal</p> <p>5 with the estate". And similarly with my clients, L&G.</p> <p>6 I was just wondering if you knew of any reason why</p> <p>7 Mrs Perepilichnaya had not taken out a grant of probate,</p> <p>8 at least until last year?</p> <p>9 A. I have no idea, I was a party maybe to one or two</p> <p>10 meetings when the death of the husband -- after the</p> <p>11 death of the husband occurred, I said she needed</p> <p>12 a probate lawyer I knew nothing about it, introduced her</p> <p>13 to Woolf Simmonds and had little or no contact in this</p> <p>14 regard after that.</p> <p>15 Q. Yes.</p> <p>16 A. Then I found out later she had changed the lawyers to</p> <p>17 Seddons or Setons or someone.</p> <p>18 Q. Can I ask you straight, do you know whether or not the</p> <p>19 estate is solvent?</p> <p>20 A. I have no idea --</p> <p>21 Q. Thank you.</p> <p>22 A. -- I mean as an immigration lawyer we look to the</p> <p>23 amounts of money that is required for the application,</p> <p>24 the rest, whatever it is.</p> <p>25 Q. Yes.</p> <p style="text-align: center;">Page 114</p>	<p>1 "Formal letter of representation from Gherson to</p> <p>2 SOCA on behalf of Browder asking SOCA as the UK NCB ..."</p> <p>3 Can you help us with "NCB"?</p> <p>4 A. Yes.</p> <p>5 Q. You can?</p> <p>6 A. Yes, I am familiar.</p> <p>7 Q. Can you tell me what it means?</p> <p>8 A. National Crime Bureau is it?</p> <p>9 Q. I don't know, I was seeking your help.</p> <p>10 A. I believe it means National Crime Bureau.</p> <p>11 Q. "... to make representation to Interpol in respect of</p> <p>12 the red notice."</p> <p>13 Can you confirm that you were engaged by Mr Browder</p> <p>14 in connection with efforts to extradite him to Russia?</p> <p>15 A. I was, yes. My firm was, I wasn't dealing with the</p> <p>16 matter.</p> <p>17 Q. You didn't deal with it yourself, no.</p> <p>18 Then 16 August 2008, Ghersons submit a 25-page memo</p> <p>19 containing further evidence in respect of Browder. This</p> <p>20 was obviously not just a passing retainer, it was</p> <p>21 a fairly solid piece of work your firm was being asked</p> <p>22 to do?</p> <p>23 A. We were extensively involved in this matter at the time.</p> <p>24 Q. Extensively involved, thank you, that is helpful.</p> <p>25 Then we see on 30 September 2008, formal letter of</p> <p style="text-align: center;">Page 116</p>

<p>1 representation from Gherson in respect of another 2 person, who I think is an employee of Hermitage -- you 3 needn't say the name but that is the case, isn't it? 4 A. Sure, yes. 5 Q. You were acting for him as well? 6 A. Yes. 7 Q. Then in May 2009, the bottom of the page, Gherson write 8 again to ask what material SOCA has provided to Interpol 9 and what discussions have taken place. It looks as if 10 from the middle of the 2008 through to the middle of 11 2009, your firm remained, as you have said, extensively 12 involved in this matter? 13 A. Hmm. 14 Q. Correct? 15 A. Correct. 16 Q. Then on October 2009, on the second page, 231, the third 17 entry, we see SOCA received a letter from Brown Rudnick, 18 obviously a different firm from yours? 19 A. I am not sure unfortunately that I have the right bundle 20 here, I seem to have lost track of the bundle. 21 THE CORONER: Don't worry, page 231. 22 A. Yes, I have got 231 here. 23 THE CORONER: Have you? Does it say "page 2 of 3" in the 24 bottom right? 25 MR MOXON BROWNE: I don't think the witness is certain he</p> <p style="text-align: center;">Page 117</p>	<p>1 to me expressing threats to life and when they have 2 expressed threats to life I have taken the appropriate 3 action. 4 I attended with Mr Browder a police station when he 5 had a threat, so, you know, at the end of the day, the 6 issue here is -- it keeps coming back to: did 7 Mr Perepilichny express a threat to life to me? And 8 the answer is no, because if he had, I would have taken 9 it to the police or I would have taken it somewhere and 10 we keep going to the same issue, it is not that one 11 treats these matters lightly, I have no affiliation to 12 his family, I have no relationship, client relationship 13 remaining with them, I have no vested interest other 14 than to tell you my recollection of what happened and 15 the normal course of practice is, if people express 16 a threat to life, I take it to the authorities and push 17 them to take it to the authorities. Perepilichny never 18 expressed that threat to me. 19 Q. Yes. I do appreciate what you are saying because I have 20 been here listening to your evidence. 21 Just finally, we see, 2 September 2011, Interpol 22 Moscow send a message to London requesting the arrest of 23 the gentleman who you mentioned was a client of yours. 24 A. Hmm. 25 Q. Just before we leave Mr Pastukhov, he was a friend and</p> <p style="text-align: center;">Page 119</p>
<p>1 has the right bundle, sir. 2 A. I don't think so. 3 Q. It should come after 230? 4 A. Bundle 5, volume 1? 5 MR MOXON BROWNE: Yes, I think so. 6 A. 231? (Pause) 7 THE CORONER: D/165 yes. 8 A. Fire away. 9 MR MOXON BROWNE: I wanted to draw your attention to the 10 third entry on page 231, that is the second page of this 11 document and the date is 27 October 2009, do you see 12 that? 13 A. Hmm. 14 Q. What it says is: 15 "SOCA received a letter from Brown Rudnick [they are 16 a firm of solicitors, not your firm I appreciate] 17 concerning threats to the life made to a Hermitage 18 lawyer, Pastukhov." 19 Mr Pastukhov I think you have described -- he is 20 a very prominent Russian emigre in this country, isn't 21 he? 22 A. Correct. 23 Q. Yes, and he is a friend or an acquaintance of yours? 24 A. I have explained to you that for better or worse I have 25 worked in this area for many years and people have come</p> <p style="text-align: center;">Page 118</p>	<p>1 acquaintance, he was also I think a client or not? 2 A. Correct. 3 Q. He was a client? 4 A. Yes. 5 Q. Yes. 6 What I want to suggest to you, Mr Gherson, is that 7 you had and indeed have a pretty well unrivalled 8 knowledge of the background to what has been called the 9 Magnitsky affair and in particular the ramifications of 10 the delivery of information by Mr Perepilichny, who was 11 also a client, to Hermitage? 12 A. Hmm. 13 Q. Unrivalled? 14 A. Well I wouldn't go that far, as I said to you I did not 15 delve into the information but I am familiar with the 16 people involved in the scenario. 17 Q. Yes, so when you say that you are not quite sure whether 18 the tax official involved in the alleged fraud was 19 Ms Stepanova or Mr Stepanov -- 20 A. I didn't say that I did not know that the tax -- 21 Q. When you say you can't -- 22 A. No, no. We can go back in the transcript, I did not say 23 that I did not know whether it was Mr Stepanov or 24 Mrs Stepanova, I said I wasn't sure which one was the 25 tax inspector of the two, one is the husband and one is</p> <p style="text-align: center;">Page 120</p>

<p>1 the other. 2 Q. When you say that you need to be prompted as to who 3 Mr Klyuev is -- 4 A. Correct. 5 Q. -- and what the relationship between Mr Pavlov -- this 6 is not right, is it, Mr Gherson, you know this story 7 very well? 8 A. Well, let's go back. First of all you are saying that 9 I have extensive information unparalleled in respect of 10 this case. I am aware of the people but I also deal 11 with a vast number of these cases. I deal with numerous 12 of these cases on an annual basis and had I known that 13 I was expected to refresh my memory with respect to all 14 the names in the Hermitage story before coming to this 15 hearing I would have sat down and gone through all of 16 it. I did recollect afterwards who the Klyuev group is, 17 I have made representations in that regard. 18 I deal with many, many cases which involve 19 allegations of fraud, et cetera, et cetera, they are all 20 very detailed and, like any lawyer, one needs to refresh 21 one's memory before one is dealing with specific 22 detailed questions on an issue. 23 If you wish to discharge me now, I will go home, 24 read up the stuff for the weekend and come back and 25 answer your questions on Monday morning.</p> <p style="text-align: center;">Page 121</p>	<p>1 a whistle? 2 A. Let's look at the word "risk", what is the risk for 3 a Russian emigre in England? He has the risk of having 4 his funds frozen, he has the risk of extradition and he 5 has, according to the way this court is going, or 6 tribunal, is there is a risk that he may be bumped off. 7 There are all different levels of risk that one advises 8 the client on. 9 If a client is going to be subject to extradition, 10 it is prudent to advise him to make his claim for 11 protection before the extradition case arises, because 12 if he succeeds in the protection claim he will not have 13 to go through the extradition procedure, he will not 14 have to go through a public court hearing at Westminster 15 Magistrates' Court, he will not have to call witnesses 16 who may in fear of their life to come and give evidence 17 and all of that may be avoided if he gets a protection 18 claim through first. A protection claim is made 19 directly to the Home Secretary, she has the discretion 20 whether to grant it or not grant it. If she does not 21 grant it it will be refused and go on appeal. And in my 22 limited experience most of these appeals will be 23 conducted in camera and witnesses will be more assured 24 to turning up to defend themselves in those 25 circumstances than in an extradition case.</p> <p style="text-align: center;">Page 123</p>
<p>1 Q. Mr Gherson, we are doing fine -- 2 A. I am not worried, I think I am. I dare say if you were 3 in my position you would not be able to identify 4 everything Mr Klyuev did in 2008 either, and I have 5 a number of clients called Klyuev involved in different 6 issues and when he threw the name at me it did not come 7 back to me that it was Klyuev with Unibank, or Uni 8 whatever it was, immediately to my mind. That is the 9 reality. 10 Q. Yes. 11 The position was when Mr Perepilichny's visa was 12 being renewed -- which was something that needed to be 13 attended to from June 2012 onwards -- 14 A. Not personally, assistants in my office attended to it 15 and I was aware of it. 16 Q. That the position was rather different than it had been 17 when he had first come to see you back in I think 2009, 18 because in the interim he had been to Hermitage with 19 some very important information and there had been 20 obvious and publicised ramifications from that. He was 21 in a different position, wasn't he? 22 A. The story was more well known in 2012 than it was in 23 2008. 24 Q. In particular you appreciated that he might be perceived 25 to be at some risk at that point, because he had blown</p> <p style="text-align: center;">Page 122</p>	<p>1 So often where a client is at threat of extradition 2 you would advise him to make a protection claim. You 3 will not necessarily say to a client make a protection 4 claim because it will stop you suffering a criminal act 5 that may terminate your life, because I have never seen 6 an asylum claim protects someone from being bumped off. 7 Q. You and I should be clear, as I know the coroner is, 8 that the question of whether or not Mr Perepilichny 9 was, as you put it, "at risk of being bumped off" is yet 10 to be decided and it is not appropriate for you or I, 11 perhaps, to make assumptions about that. It is for the 12 coroner in due course. 13 A. I agree with you. That was the purpose of my call to 14 the police, not to make any presumptive decisions at all 15 but to make sure the proper evidence was obtained in 16 order to make a reasoned well thought out decision. 17 Q. But nevertheless, in June/July 2012 you thought it 18 appropriate to advise your client, as you had I suggest 19 advised many other clients, that they could if they 20 wanted to see if they could apply for asylum. That was 21 something you raised with them? 22 A. I advised him it was an option. 23 Q. When you said to the coroner the thought had never 24 crossed your mind in answer to a question from him, that 25 was not true, was it? It did cross your mind and you</p> <p style="text-align: center;">Page 124</p>

<p>1 suggested it?</p> <p>2 A. No. I suggested -- sorry? I said it didn't cross my</p> <p>3 mind to ask him to apply for asylum?</p> <p>4 Q. The coroner put a question to you, and sometimes that</p> <p>5 does not perhaps --</p> <p>6 A. If you can repeat it, I may clarify.</p> <p>7 Q. The question was, had it crossed your mind that</p> <p>8 Mr Perepilichny might be a candidate for asylum? The</p> <p>9 question was put by the judge, I say no more about that</p> <p>10 but it was put by the judge and you said, "No, it never</p> <p>11 crossed my mind" or --</p> <p>12 A. It crossed my mind because I offered him the option.</p> <p>13 Q. I am suggesting to you that evidence was wrong, because</p> <p>14 it plainly had crossed your mind because you advised him</p> <p>15 he could do it?</p> <p>16 A. Correct, I made an error.</p> <p>17 Q. Yes.</p> <p>18 And you knew, when Mr Perepilichny died, in</p> <p>19 circumstances about which you knew very little, that</p> <p>20 that might be connected with the same risk that you</p> <p>21 perceived in June, a few months earlier, it is the first</p> <p>22 thing that came into your mind, you were shocked and</p> <p>23 suspicious.?</p> <p>24 A. It didn't come into my mind in June. I knew about the</p> <p>25 Magnitsky story from 2008 and I knew about the</p> <p style="text-align: center;">Page 125</p>	<p>1 Q. Yes, I understand and you were using the word</p> <p>2 "protection" in that context?</p> <p>3 A. Yes. I mean I don't have a bodyguard service; I am</p> <p>4 a firm of lawyers. And we use the word "protection" in</p> <p>5 terms of protection under the Human Rights Act or</p> <p>6 Refugee Convention. It is a colloquial term used by</p> <p>7 asylum lawyers.</p> <p>8 Q. When you say he was offered it, you said to him this is</p> <p>9 something you could look at if you want to but he didn't</p> <p>10 want to. Is that right?</p> <p>11 A. Correct.</p> <p>12 Q. Correct? Yes.</p> <p>13 I think that, apart from your immigration service,</p> <p>14 your firm offering more general legal services is called</p> <p>15 "Discreet"?</p> <p>16 A. Correct.</p> <p>17 Q. You enjoy, do you not, in a community or clientele that</p> <p>18 values it, a reputation for discretion? That is why</p> <p>19 they come to you?</p> <p>20 A. If it is a play on words, yes.</p> <p>21 Q. I want to suggest to you that in giving your evidence</p> <p>22 about your knowledge of the situation in which</p> <p>23 Mr Perepilichny found himself, you have in the</p> <p>24 interests of discretion rather minimised the extent of</p> <p>25 your true knowledge about these matters.</p> <p style="text-align: center;">Page 127</p>
<p>1 Perepilichny's involvement earlier than that, when he</p> <p>2 told me he wanted to meet Browder.</p> <p>3 The offer of making that application, I believe from</p> <p>4 recollection, occurred when he applied to renew his</p> <p>5 investor visa in 2012, I think the date was.</p> <p>6 Q. You gave some evidence this morning, in answer to</p> <p>7 questions from counsel to the inquest, and I didn't</p> <p>8 properly hear your answer. It was about the question of</p> <p>9 getting protection, and I think I heard you say -- but</p> <p>10 I would like you to confirm one way or the other -- that</p> <p>11 protection was offered to Mr Perepilichny but he</p> <p>12 refused it. Is that correct?</p> <p>13 A. No, I don't offer protection. Protection is</p> <p>14 an application. He was offered if he wished to make the</p> <p>15 application --</p> <p>16 Q. Sorry, would you say it slowly and clearly?</p> <p>17 A. Protection covers the Refugee Convention and the Human</p> <p>18 Rights Convention, and when you make an application for</p> <p>19 protection you make an application to the Secretary of</p> <p>20 State to be recognised either with human rights</p> <p>21 protection or as a refugee, when you say you offer</p> <p>22 clients protection, it is an offer to make</p> <p>23 an application to the Secretary of State to vary your</p> <p>24 leave from that of an investor to that of a refugee or</p> <p>25 someone seeking human rights protection.</p> <p style="text-align: center;">Page 126</p>	<p>1 A. No, that is a very strong allegation to make against me.</p> <p>2 I have been asked to come here to tell the court or the</p> <p>3 tribunal what happened and I have expressed what</p> <p>4 happened. The fact that I refused to be pressurised and</p> <p>5 drawn into changing my view that he had a fear of death</p> <p>6 of which I had no knowledge, I have told you everything</p> <p>7 I know.</p> <p>8 Q. I think it is a question that has been put to you by</p> <p>9 another but I will put it again, if I may, that you may</p> <p>10 have felt that in talking to the police in the way you</p> <p>11 did, in retrospect, that you had been a bit indiscreet?</p> <p>12 A. Not at all. Not at all. If you look back to the</p> <p>13 history of what has happened since perestroika, when the</p> <p>14 Berlin Wall came down, to the time when Putin came to</p> <p>15 power, to the time that these Russian emigres have come</p> <p>16 to the United Kingdom, these cases where people have</p> <p>17 died and the circumstances have either not been</p> <p>18 explained or been explained by people who have</p> <p>19 a particular view, it has led to huge amounts of</p> <p>20 speculation which has worldwide ramifications for</p> <p>21 everybody, including international relations, sanctions</p> <p>22 lists, sanctions lists on international companies. And</p> <p>23 the sole purpose of my call was in this instance,</p> <p>24 because of the Browder/Magnitsky story, was to make sure</p> <p>25 that this thing was properly investigated and if the man</p> <p style="text-align: center;">Page 128</p>

1 had been killed then it would be ascertained by the
 2 coroner. If the man had not been killed, because there
 3 was insufficient evidence, then the verdict would be
 4 reached in that regard.
 5 That was the sole purpose of the call to the police.
 6 Q. You referred to a call, there were in fact three calls.
 7 You persisted in this contact --
 8 A. No, there were three calls to Scotland Yard, the coroner
 9 and Surrey Police on the Friday evening. None of those
 10 calls, other than the one to Scotland Yard, were
 11 answered and they told me to go back to Surrey Police
 12 and we have ascertained that I agree that I spoke to
 13 Mr Drinkwater on the Sunday. What we do not agree on is
 14 the time I spoke to Mr Drinkwater and when he made his
 15 notes of the matter. I was on a plane to New York when
 16 Mr Drinkwater said I spoke to him.
 17 Q. Lest we forget, there was thereafter a call to a police
 18 officer called Lloyd which didn't lead to anything, then
 19 one to Mr Burden that we have heard about, and then one
 20 to the coroner himself?
 21 A. Sure. But you forget to mention that one or two of
 22 those calls were in connection with the police getting
 23 in touch with me in returning calls because they wanted
 24 to see Mrs Perepilichnaya. There was also, as
 25 I recollect, the call in connection with when the body

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1 would be released so she could bury him on religious
 2 grounds.
 3 MR MOXON BROWNE: Thank you, Mr Gherson.
 4 Questions from MS HILL
 5 MS HILL: Mr Gherson, I have a few questions for you please
 6 on behalf of Hermitage.
 7 I will just try and deal with one brief matter first
 8 of all please if I may. Can you be given volume 5,
 9 page 121 just to see if you can help us with this issue,
 10 volume 5, page 121.
 11 A. Hmm.
 12 Q. Mr Gherson, this is a document I think you have not been
 13 taken to before.
 14 A. One second, I just want to get the pages are not very
 15 clear on this thing.
 16 Q. Do you see in the bottom right, 121, page 3 of 3,
 17 "Restricted intel" in the bottom of the middle of the
 18 page, is that what you see?
 19 A. Yes.
 20 Q. Just to make sure we have the right page. Do you see in
 21 the bottom half of this document, reference to
 22 Mrs Perepilichnaya's contact with the police on
 23 31 May 2011, do you see that?
 24 A. Yes.
 25 Q. The address given at that time was the Virginia Water

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1 address; do you see that?
 2 A. Yes.
 3 Q. I am just asking if you can help us with this issue,
 4 because the coroner may have to determine issues in
 5 relation to the date of the move to The Coach House in
 6 Weybridge. Do you see on the top half of this page it
 7 appears to suggest that on 26 June 2011 they made
 8 a further application for leave to remain and on that
 9 date gave The Coach House in Weybridge as an address.
 10 Is that something that you have checked, Mr Gherson, to
 11 see whether you can help us with some details around
 12 that?
 13 A. Sure, I mean the date is slightly confusing, you said
 14 2011.
 15 Q. It is, it is not terribly clear and the coroner may have
 16 to do the best he can with this.
 17 A. All I can do is I asked my office to prepare
 18 a chronology before I came here and they tell me that
 19 our engagement letter for the -- to act in connection
 20 with extending the investor visa was issued on
 21 8 February 2012.
 22 Q. Is that the same as a further application for leave to
 23 remain?
 24 A. Yes, correct.
 25 Q. Would that have been made on a regular renewal basis

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1 though?
 2 A. You are normally granted -- I have to look it up --
 3 either two years plus three years or three plus two, in
 4 this situation they were given two years and then
 5 renewed for a further three years to 2015.
 6 The chronology I've got says:
 7 "Client care letter issued on 8 February 2012.
 8 "Application submitted for extension on
 9 22 June 2012.
 10 "Biometric fingerprints taken on 26 June 2012.
 11 "Extension issued on 26 June 2012."
 12 Q. Thank you, that helps us with that issue.
 13 Can I move on now, please, to ask you some questions
 14 about the Magnitsky issues about which some questions
 15 have already been put to you, and I am trying not to
 16 repeat what you have already been asked.
 17 You said in your evidence, Mr Gherson, that in your
 18 experience, I think the phrase you used was that
 19 sometimes people in the Russian community rightly or
 20 wrongly have a different risk profile. That is
 21 something I think you said; is that right?
 22 A. Correct.
 23 Q. I think what you meant by that was that sometimes, the
 24 dealings in business and things like that, different
 25 things perhaps happen in Russian business dealings than

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<p>1 would happen in other business dealings. Is that right?</p> <p>2 A. I think the way business is conducted and their</p> <p>3 day-to-day lives is vastly different from here.</p> <p>4 Q. Are you familiar with what has been described as</p> <p>5 "raiderstvo", which is the idea of a criminal group</p> <p>6 using litigation as a way of intimidating or threatening</p> <p>7 people, have you heard that Russian word?</p> <p>8 A. I am.</p> <p>9 Q. Do you understand that that can include using criminal</p> <p>10 proceedings to intimidate people and also civil</p> <p>11 proceedings?</p> <p>12 A. Correct.</p> <p>13 Q. Are you familiar with the proposition that Mr Pavlov,</p> <p>14 a man we have been hearing about, is a lawyer within the</p> <p>15 ministry of the interior but also is part of</p> <p>16 an organised criminal group. Do you know about that?</p> <p>17 A. I am aware of that allegation, yes.</p> <p>18 Q. Mr Moxon Browne, who sits behind me, took you through</p> <p>19 this list of dates, I won't take you back to it,</p> <p>20 Mr Gherson, but this document you were taken through</p> <p>21 shows, doesn't it, if I want to summarise it, but you</p> <p>22 perhaps will look at page 230 just to refresh your</p> <p>23 memory -- in the same bundle I think.</p> <p>24 A. Sure. Hmm. Yes.</p> <p>25 Q. Does that bring up, Mr Gherson, this timeline that</p> <p style="text-align: center;">Page 133</p>	<p>1 A. I am.</p> <p>2 Q. And that others who have been put on sanction lists</p> <p>3 include Ms Stepanova, Mr Stepanov, Karpov, Kuznetsov,</p> <p>4 and Klyuev himself?</p> <p>5 A. Correct, I have refreshed my memory on Klyuev, yes.</p> <p>6 Q. I think we have documentation to show, just to be clear</p> <p>7 about this, American sanctions lists from 2013 and 2014,</p> <p>8 they are at our pages 376 and 378 of volume 4 and</p> <p>9 European lists that I think go back to also in the back</p> <p>10 of volume 4, you don't need to turn it up but they are</p> <p>11 also going back to about 2014. Does that sound about</p> <p>12 right to you?</p> <p>13 A. It sounds about right. I haven't got the lists in front</p> <p>14 of me so I can't comment, yes.</p> <p>15 Q. All right, does that chronology though sound broadly</p> <p>16 correct, that there have been these sanctions lists on</p> <p>17 which people have featured and that has been in</p> <p>18 existence for several years?</p> <p>19 A. Yes.</p> <p>20 Q. And in fact that concerns about the targeting of lawyers</p> <p>21 like Mr Magnitsky and about politically motivated abuse</p> <p>22 of the criminal justice system have been live for longer</p> <p>23 than that?</p> <p>24 A. The first cases I encountered of that were 2003/2004,</p> <p>25 yes.</p> <p style="text-align: center;">Page 135</p>
<p>1 Mr Moxon Browne took you through? Does that show that</p> <p>2 from as far back as early December 2007, Hermitage and</p> <p>3 Mr Browder have been raising allegations about organised</p> <p>4 criminal groups in Russia to the various authorities in</p> <p>5 England?</p> <p>6 A. Correct.</p> <p>7 Q. That that has included some involvement by you but also</p> <p>8 with other lawyers?</p> <p>9 A. Correct.</p> <p>10 Q. That includes making references to the Serious Organised</p> <p>11 Crime Agency and other police authorities; is that</p> <p>12 a fair summary?</p> <p>13 A. Yes.</p> <p>14 Q. You are also familiar, I think as you alluded to, with</p> <p>15 the fact that the nature of the criminal activity that</p> <p>16 underpins the fraud, the Hermitage fraud, if we can call</p> <p>17 it that, has led to has it not sanctions on the American</p> <p>18 stage and the European stage?</p> <p>19 A. Correct.</p> <p>20 Q. I think you know, don't you, that certain named</p> <p>21 individuals have been the subject of such sanctions?</p> <p>22 A. Yes.</p> <p>23 Q. Just to deal with this relatively briefly if I may, are</p> <p>24 you familiar in particular with the fact that Mr Pavlov</p> <p>25 is one such person?</p> <p style="text-align: center;">Page 134</p>	<p>1 Q. That phenomenon goes back quite a long way?</p> <p>2 A. Yes.</p> <p>3 Q. Are you aware of the proceedings in America that</p> <p>4 concluded quite recently, where the Department of</p> <p>5 Justice sought to trace some of the money involving</p> <p>6 a company called Previson(?), are you aware of that or</p> <p>7 not?</p> <p>8 A. Very, very briefly. I knew there was an action going</p> <p>9 on, I have not followed it.</p> <p>10 Q. Do you know this element of it though, that that</p> <p>11 involves the American criminal authorities taking a case</p> <p>12 to try and trace some of the money?</p> <p>13 A. Correct, yes.</p> <p>14 Q. You know obviously about the Swiss proceedings, where</p> <p>15 the Swiss authorities have taken the initiative and they</p> <p>16 have brought proceedings to try and again trace some of</p> <p>17 the money?</p> <p>18 A. I know that there are Swiss proceedings, I am not aware</p> <p>19 of the detail. It might sound strange to you but I have</p> <p>20 a large number of cases going on and I only delve into</p> <p>21 matters which pertain to my cases or I am directed to or</p> <p>22 I think would be relevant to my matters.</p> <p>23 Q. As far as Mr Perepilichny is concerned though, did you</p> <p>24 know that he had given information to the Swiss</p> <p>25 proceedings about the fraud?</p> <p style="text-align: center;">Page 136</p>

1 **A. I know that he had an issue in Switzerland and he wanted**
 2 **a Swiss lawyer and I made an introduction to**
 3 **Horst Weber, he is a Swiss lawyer and Horst Weber dealt**
 4 **with it.**
 5 Q. You, I think, did know -- as anybody working in this
 6 field would know -- that Mr Magnitsky's death was said
 7 to be directly linked with the fraud?
 8 **A. That is what I have been told, yes.**
 9 Q. Again I think because this was such a significant issue,
 10 you must know that that has been investigated by various
 11 European and international bodies and has been widely --
 12 **A. Many, correct.**
 13 Q. -- condemned, hasn't it?
 14 **A. Yes.**
 15 Q. It has been widely recognised that he died as a result
 16 of his work on the fraud?
 17 **A. It has been widely recognised that he died of the severe**
 18 **treatment he received in prison, correct.**
 19 Q. It is believed that that is a politically motivated act?
 20 **A. Correct.**
 21 Q. Are you familiar with the names of three other people
 22 who it is said have died in connection with the fraud --
 23 let me give you the names and see if they are familiar
 24 to you, Valery Kurochkin, Octai Gasanov,
 25 Semyon Korobeinikov. Are they names that are familiar

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1 to you?
 2 **A. I am familiar with the names, I am not familiar with the**
 3 **circumstances of the cases.**
 4 Q. Are you familiar with the suggestion that those three
 5 people have also died in connection with that
 6 \$230 million fraud?
 7 **A. No.**
 8 Q. You are not?
 9 **A. But there are other people who are alleged to have died**
 10 **as a result of being involved in fraud cases et cetera,**
 11 **there are a number of names.**
 12 Q. You certainly were aware, weren't you, of the risk
 13 around the Magnitsky issue or the Magnitsky case,
 14 because you knew that Magnitsky himself had died as
 15 a result of the fraud?
 16 **A. Any case arising in the former Soviet Union involving**
 17 **prosecutions or politically motivated prosecution, abuse**
 18 **of the process in order to extract funds, et cetera,**
 19 **comes with attenuate risk and there are many cases.**
 20 **This case has received a huge preponderance of**
 21 **publicity, but there are many cases and there are**
 22 **different level of risk thresholds and there are many**
 23 **cases involving fraud, et cetera where people have not**
 24 **died.**
 25 Q. Yes. But what you are describing I think from your own

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1 experience and background is that somebody who is
 2 perceived to be a whistleblower on a criminal group is
 3 somebody who faces significant risk, aren't they?
 4 **A. No, that is not what I said. What I believe is that**
 5 **someone who dies beyond -- earlier than one would expect**
 6 **them to die will always attract the attention of**
 7 **different parties to ascertain whether that death was**
 8 **a natural occurrence or whether it was through some**
 9 **misfeasance, and in this situation the man was involved**
 10 **with the Magnitsky case, he was involved with the**
 11 **Browder/Hermitage thing which received considerable**
 12 **publicity, which received ventilation in both the**
 13 **European Parliament, the United States Congress which**
 14 **led to various acts, sanctions, lists, et cetera and**
 15 **therefore it occurred to me that if there was not**
 16 **a proper investigation into this man's death, there**
 17 **would be a considerable amount of speculation as to**
 18 **whether it had been ordered or whether it was through**
 19 **natural causes. And the sole purpose of my contact to**
 20 **the authority was to ascertain the facts to get the true**
 21 **position.**
 22 Q. You have said in the attendance note I think at page 12
 23 of the later meeting, it was your concern -- I will just
 24 read out the phrase that is written down here:
 25 "I called the police on Friday night, [you explained

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1 how you couldn't get through et cetera] on Monday
 2 I called the coroner. I told the Magnitsky story and
 3 the possible connection."
 4 Is that is what you were concerned about?
 5 **A. Yes, because I mean if somebody at the age of whatever**
 6 **he was, 48, 50 drops down dead of a heart attack jogging**
 7 **I think statistics reflect that people do drop down dead**
 8 **with heart attacks at that age when they go jogging.**
 9 **The reason for making the call in connection with this**
 10 **man is because of his connection to this case.**
 11 Q. You have been aware of other individuals who have made
 12 asylum applications based on a fear of persecution
 13 because of their links with this case; is that right?
 14 **A. Correct.**
 15 Q. Just to correct one part of the evidence, you may or may
 16 not be able to help with this, I think I put a slightly
 17 wrong proposition to you, Mr Pavlov is not said to be
 18 a lawyer within the interior ministry but the
 19 consigliere for the KOCG, so a lawyer for the KOCG. Can
 20 you help us with that?
 21 **A. Can I?**
 22 Q. Can you help us with whether or not Mr Pavlov is said to
 23 be a lawyer for the KOCG, not in the interior ministry?
 24 **A. There is a lot of speculation about what Mr Pavlov does**
 25 **and doesn't do.**

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1 Q. I see.
 2 In relation to the call that you made to
 3 Mr Drinkwater, you have explained how you rang up
 4 because of this possible connection. I won't go through
 5 the details, you have explained how you haven't got
 6 a note of the call, it was made in rather rushed
 7 circumstances and obviously the coroner will form a view
 8 on exactly what was said during that call, but is this
 9 right, that you were frustrated, I think you said, at
 10 the lack of response by the policing authorities?
 11 **A. Yes, it is reflected in the attendance note, I didn't**
 12 **have of 30 November --**
 13 Q. Just pausing there if I may, you make the call to
 14 Mr Drinkwater I think on 18 November, the Sunday --
 15 **A. I believe so.**
 16 Q. -- perhaps in the afternoon, as I think you have said.
 17 You were at that time saying that full toxicology
 18 tests should be done?
 19 **A. Correct.**
 20 Q. You weren't I think made aware, were you, at that point,
 21 in that call to Mr Drinkwater, that in fact the hospital
 22 or local post mortem had already taken place?
 23 **A. No, he wouldn't tell me anything, he said he didn't know**
 24 **who I was, he didn't know who was making the call, there**
 25 **were data protection issues. I went all through that**

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1 **and I said to him you need to do full toxicology tests**
 2 **to avoid a Litvinenko type scandal and get on and do it,**
 3 **and I was very frustrated. All I was trying to do was**
 4 **convey a message about what the police should do.**
 5 Q. Can I ask you about the Litvinenko aspect of your
 6 evidence. In the Litvinenko case full toxicology tests
 7 were done, weren't they, and it was difficult to
 8 identify what the man had been poisoned by --
 9 **A. With reference to Litvinenko --**
 10 Q. Sorry, can I put a question to you, please.
 11 Help us please understand, if I may, what you
 12 thought the scandal was around that, because that was
 13 a case where there had been extensive testing done from
 14 an early stage, wasn't it?
 15 **A. Notwithstanding the full toxicology tests had been done,**
 16 **there was still a huge scandal and a lot of speculation**
 17 **around the Litvinenko issue, and I was conveying, trying**
 18 **to bring a man about in his head to understand the**
 19 **ramifications of what I was telling him. It was really**
 20 **to avoid the saga and to avoid a huge blown out case**
 21 **et cetera, which I felt, maybe naively, would be**
 22 **curtailed or a lesser story if the full tests were done**
 23 **quickly.**
 24 Q. I see. You were trying to convey to the police the
 25 potential seriousness of this case?

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1 **A. Correct.**
 2 Q. You were trying to say to them:
 3 "This might be, it might not be but it might be
 4 another type of case like Litvinenko, so take it
 5 seriously from the very beginning."
 6 **A. Yes, and I didn't know when I spoke to you before that**
 7 **I had this attendance note and the frustration is**
 8 **reflected in that attendance note that you are now**
 9 **finally taking it seriously.**
 10 Q. You would have been disappointed would you to have been
 11 told by Mr Drinkwater when you spoke to him on the 18th
 12 that by that point Mr Perepilichny's stomach contents
 13 had been disposed of already, you would have been
 14 disappointed to be told that?
 15 **A. Disappointment is not an issue when dealing in these**
 16 **areas with authorities. I felt that I had carried out**
 17 **my duty. I had conveyed the message and they had to do**
 18 **with it what they wanted.**
 19 Q. Is this right, Mr Gherson, that the note of 30 November
 20 that you are referring to reflects does it your
 21 frustration that your call from the 18th didn't appear
 22 to have had generated a serious response by the police?
 23 I will just read out your note. You say here:
 24 "I said [the bottom third of your note] to Ms Taylor
 25 I had not made a big issue of the fact that the police

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1 were hiding behind the issue that these two letters had
 2 triggered the necessity to conduct a further post
 3 mortem. I repeated I had not made a big issue of the
 4 fact the police had ignored it until this week."
 5 Does that reflect that in the interval between the
 6 18th and the 30th you felt that the police had not in
 7 fact moved the investigation on more seriously?
 8 **A. Sure. I am a lawyer. I am not a scientist. I don't**
 9 **know how it works if you poison someone. I don't know**
 10 **if the poison dissipates through the body properly.**
 11 **I just applying natural logic suggested if there was**
 12 **something untoward here, the authorities should deal**
 13 **with it expeditiously. And that was the sole purpose of**
 14 **conveying the message and that comment was made and the**
 15 **in fact that another two days had been lost.**
 16 Q. Well slightly more than two days, between the 18th and
 17 the 30th?
 18 **A. 10 days or whatever, yes, 12 days, yes.**
 19 Q. I won't take you to the detail of it -- my last
 20 question, please, Mr Gherson -- but is it right to
 21 assume that the note of the meeting on the 30th that was
 22 typed up I think by your assistant --
 23 **A. When I have these type of meetings normally I bring**
 24 **someone in to keep a note, yes.**
 25 Q. That that was as close to a verbatim note of that

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<p>1 meeting as possible?</p> <p>2 A. Yes, I believe so. It was done at the time.</p> <p>3 MS HILL: Just bear with me a second.</p> <p>4 Thank you very much.</p> <p>5 MS BARTON: No questions, thank you, sir.</p> <p>6 Questions from MR BEGGS</p> <p>7 MR BEGGS: Mr Gherson, I am representing Mrs Perepilichnaya.</p> <p>8 We can see from page 230 of bundle 5, which you may</p> <p>9 still have open --</p> <p>10 A. I've got the wrong place again.</p> <p>11 Yes.</p> <p>12 Q. Do you have page 230 now?</p> <p>13 A. Sorry?</p> <p>14 Q. Do you have page 230 in front of you?</p> <p>15 A. I believe so.</p> <p>16 Q. You see that Gherson Solicitors were acting, it appears,</p> <p>17 for Mr Browder from at least as early as 23 May 2008?</p> <p>18 A. If it says so, yes.</p> <p>19 Q. I don't want to be unfair to you because --</p> <p>20 A. I told you I had acted for Browder and met him in 1989,</p> <p>21 so I had had periodic contact with him.</p> <p>22 Q. This particular retainer in relation to red notices</p> <p>23 issued by Russia --</p> <p>24 A. I assume so, I am not being flippant I don't have the</p> <p>25 dates.</p> <p style="text-align: center;">Page 145</p>	<p>1 Q. Have you acted for him professionally?</p> <p>2 A. No.</p> <p>3 Q. But you have met him periodically since then?</p> <p>4 A. Yes.</p> <p>5 Q. When did you last meet Mr Browder?</p> <p>6 A. I saw him outside today, but I didn't say hello.</p> <p>7 Q. When did you last formally meet him?</p> <p>8 A. The last time I saw him was probably last year,</p> <p>9 professionally.</p> <p>10 Q. Professionally?</p> <p>11 A. Well not professionally meeting him, I have had a couple</p> <p>12 of telephone calls from him.</p> <p>13 Q. When did you last speak to him on the telephone?</p> <p>14 A. Probably about three or four months ago.</p> <p>15 Q. All right, so -- there is no mystery or trickery to</p> <p>16 my --</p> <p>17 A. It was nothing to do with this case, it was in</p> <p>18 connection with recommending a particular person to do</p> <p>19 something.</p> <p>20 Q. You have known Mr Browder on and off, dealt with him on</p> <p>21 and off, for well over a decade?</p> <p>22 A. Yes.</p> <p>23 Q. Is he a friend of yours?</p> <p>24 A. No, he is an acquaintance, we don't socialise, I don't</p> <p>25 think we have ever been out to dinner.</p> <p style="text-align: center;">Page 147</p>
<p>1 Q. Wait for the question, I am not being rude but it is</p> <p>2 late on a Friday.</p> <p>3 This particular retainer relating to red notices</p> <p>4 potentially issued by Russia through Interpol, how long</p> <p>5 did that retainer with Mr Browder prevail?</p> <p>6 A. I have no idea.</p> <p>7 Q. Are we talking months or years?</p> <p>8 A. Sorry?</p> <p>9 Q. Are we talking months or years?</p> <p>10 A. If I can answer your question.</p> <p>11 Q. Yes.</p> <p>12 A. Neil Micklethwaite was a partner in my firm I believe</p> <p>13 from 2007 to early 2010, but I have to check the dates,</p> <p>14 and when he went off to Brown Rudnick the matters were</p> <p>15 transferred to him.</p> <p>16 Q. I see, very helpful.</p> <p>17 A. That is an estimate from this date until the end of</p> <p>18 2009/2010.</p> <p>19 Q. It follows, it would appear, that Gherson were acting</p> <p>20 for Mr Browder for two to three years?</p> <p>21 A. Correct.</p> <p>22 Q. Yes. Have you professionally acted for Mr Browder since</p> <p>23 2010?</p> <p>24 A. I have had interaction with Mr Browder periodically</p> <p>25 since 2010.</p> <p style="text-align: center;">Page 146</p>	<p>1 Q. Can I now turn to Mr Pastukhov, who we have heard is</p> <p>2 an experienced lawyer. Is that your understanding?</p> <p>3 A. Correct.</p> <p>4 Q. Is he a dual-qualified lawyer, England and Russia?</p> <p>5 A. No, as far as I am aware he is only a lawyer qualified</p> <p>6 in Russia and possibly Ukraine.</p> <p>7 Q. He is an experienced lawyer, you would agree with that?</p> <p>8 A. Correct, his main qualification was I believe in</p> <p>9 pharmaceutical area, dealing with pharmaceutical cases</p> <p>10 in Russia.</p> <p>11 Q. He now lives in England and has done for some time?</p> <p>12 A. Correct.</p> <p>13 Q. Have your firm been professionally retained by him as</p> <p>14 well?</p> <p>15 A. Correct.</p> <p>16 Q. Again, give us just a broad timescale for that</p> <p>17 professional retainer?</p> <p>18 A. Probably about five or six years we dealt with</p> <p>19 immigration matters for him.</p> <p>20 Q. Yes. Turning to Vadim Kleiner, you know that gentleman?</p> <p>21 A. Yes.</p> <p>22 Q. He is also an employee of Hermitage, yes?</p> <p>23 A. Yes.</p> <p>24 Q. Have you also been retained by him?</p> <p>25 A. Correct.</p> <p style="text-align: center;">Page 148</p>

1 Q. Is it roughly the same timescale?
 2 **A. Correct, we dealt with the immigration matters for these**
 3 **people coming in to a conclusion.**
 4 Q. As others have put it, and your answers in the last
 5 three to four minutes perhaps further demonstrate, you
 6 are obviously very well versed in Russian politics,
 7 Russian business and the like?
 8 **A. And knowledge, yes.**
 9 Q. Yes. One thing is for sure, that any successful Russian
 10 businessman is likely to be subject from time to time to
 11 bribery, corruption, attempts to suborn them and so
 12 forth, that seems to be the culture?
 13 **A. I wouldn't say you would say that in respect of every**
 14 **successful Russian businessman. I have had clients who**
 15 **have come through since 2000 who have made money on high**
 16 **tech companies, innovative stuff which has been floated**
 17 **outside Russia, have made considerable sums of money and**
 18 **they have not told me about any instances of this.**
 19 Q. Some have been luckily unaffected, but if I was to
 20 rephrase the question and suggest that the operating
 21 business environment is rather more difficult in Russia
 22 than it is --
 23 **A. The operating business environment is different.**
 24 Q. It is different and difficult for reasons which include
 25 the level of corruption?

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1 **A. Yes.**
 2 Q. When you were speaking of the various vested interests,
 3 I select your own words in relation to the Magnitsky
 4 saga, which people or companies did you have in mind as
 5 having vested interests?
 6 **A. Well, we are here today, we have an insurance company**
 7 **that has an interest to show certain things in one**
 8 **regard. You have an interest to show certain things in**
 9 **another regard.**
 10 Q. I asked you about Magnitsky, not about anything else.
 11 **A. No, but the correlation between this case and Magnitsky**
 12 **are completely intertwined.**
 13 Q. To go back to my question then, who are the vested
 14 interests in the Magnitsky affair? The ones to whom you
 15 were referring earlier to the learned coroner?
 16 **A. The list is never ending, you can start with Mr McCain**
 17 **who is a senator in the United States who promoted the**
 18 **Magnitsky legislation. You can talk about various Euro**
 19 **MPs who have dealt with it there. Mr Browder has gone**
 20 **to considerable lengths and great risks to himself both**
 21 **business wise, financially, and otherwise to bring the**
 22 **Magnitsky story to the public domain and to make sure**
 23 **that a campaign was established to get justice for**
 24 **Magnitsky.**
 25 **He has a vested interest to ensure that he gets**

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1 **justice for Magnitsky and the family.**
 2 **And then you have political powers who have vested**
 3 **interests in world politics in swaying these types of**
 4 **cases one way or the other.**
 5 Q. Does Mr Browder from time to time refer clients your
 6 way?
 7 **A. He has on occasion.**
 8 **As have a number of other Russian, English,**
 9 **American, Chinese and whoever else. I do not publicise**
 10 **my firm widely. I am quite well known in the field.**
 11 **I do not go out and get work, it comes to me by word of**
 12 **mouth right across the board.**
 13 Q. In your statement you referred to your dealings with
 14 Mr Perepilichny the deceased, from about 2002 onwards.
 15 **A. Yes, I clarified this, yes.**
 16 Q. You qualified this, yes. It seems that you knew him on
 17 and off at various levels of intensity for approximately
 18 10 years?
 19 **A. No, I clarified during the lunchtime for which**
 20 **I apologise if I misled the coroner. He approached our**
 21 **firm in 2002 with an enquiry on an investor visa,**
 22 **an engagement letter was issued, it was never followed**
 23 **up and we have no record of any further contact with him**
 24 **until 2009 when the matter was reignited regarding**
 25 **moving to the United Kingdom.**

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1 Q. Yes, so from 2009 to his death, on and off you were
 2 dealing with him?
 3 **A. Yes, the way it works in my firm is if people come in**
 4 **for investor visas I will see them initially, I will go**
 5 **through the investor visa rules with them, I will**
 6 **discuss the tax implications with them, I will refer**
 7 **them on to tax advisers, and there will be people within**
 8 **my firm that will be dealing with the necessary**
 9 **paperwork to pursue the application.**
 10 **So I step in and out of these meetings, I don't**
 11 **regularly deal with them all the way through. If issues**
 12 **arise I get involved.**
 13 Q. Would you agree with me, based on that two to three
 14 years of experience with him, he was obviously
 15 an intelligent man?
 16 **A. Yes.**
 17 Q. And he was an experienced businessman?
 18 **A. He was experienced, but I need to tell you I did not**
 19 **spend extensive periods of time with this gentleman. He**
 20 **came into the office, he made enquiries about the**
 21 **investor visa, he came in periodically which I have**
 22 **alluded to, he asked to meet Browder, I told him to take**
 23 **separate advice on that, he then met Pastukhov. I was**
 24 **not -- he is not someone I saw on a day-to-day,**
 25 **week-to-week, month-to-month basis.**

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<p>1 Q. I understand, but you formed the impression, didn't you, 2 that he very much ran the business and finance side of 3 his family and his wife looked after the children and 4 you had very little dealings with her? 5 A. That's correct, I mean my understanding was that the 6 wife knew little about what he did, what was going on, 7 et cetera. 8 Q. Yes. 9 In your statement, you speak of the introduction 10 that you made for Mr Perepilichnyy to Mr Browder as 11 being in about May 2011. 12 A. That is my belief of the data. It was not to Browder, 13 it was to Pastukhov I believe. 14 Q. Yes. 15 Can you just help me, your statement says that you 16 were asked by the deceased if you knew Bill Browder or 17 any of his associates and if you could introduce him. 18 You made the introduction in about May 2011? 19 A. That is what I believe, yes. 20 Q. Are you saying to the court that the -- as it were the 21 person to whom you introduced him was Mr Pastukhov? 22 A. Correct. 23 Q. You understood the basic reason for the introduction 24 that was sought? 25 A. Yes, he said he had information about the Magnitsky</p> <p style="text-align: center;">Page 153</p>	<p>1 Q. So you agree with my question? 2 A. Correct. 3 Q. Just to go back to it, he never told you anything 4 directly to cause you to have to give him that advice? 5 A. Correct. 6 Q. Nor did he tell you anything indirectly to cause you to 7 infer the need to give him that advice? 8 A. Correct. 9 Q. That remained the position up until the Friday after his 10 death when you had the conversation with his widow? 11 A. Correct. 12 Q. It follows, I think, that you stand by the concluding 13 sentence at paragraph 5, if you wouldn't mind taking it 14 up of your statement, prepared for these proceedings, 15 dated 16 June? 16 A. I will get there in a minute. 17 Q. Take your time. 18 A. Yes. (Pause) 19 Q. What you say in that concluding sentence -- 20 A. "I have no reason to believe that Mr Perepilichnyy's 21 death was suspicious." 22 Q. In fact what you say is: 23 "It is important to appreciate that I had and have 24 absolutely no reason to believe that his death was 25 suspicious."</p> <p style="text-align: center;">Page 155</p>
<p>1 story and he wanted to meet the Browder people. 2 Q. Yes. 3 Accepting your qualification as to how often you met 4 or spoke with Mr Perepilichnyy, however often or however 5 many times it was over that three-year period, he never 6 told you anything to cause you to think that he thought 7 he was at risk? 8 A. No. 9 Q. He never -- 10 A. As I explained to you, I have practised in this area for 11 a long time. I am unable to ascertain whether a threat 12 is real or not. I am a solicitor. If a client comes to 13 my office and says, "I am in fear" or, "I have 14 a problem", I will then take it to the appropriate 15 authorities. 16 That did not occur with this gentleman. 17 Q. Yes, because from the number of times you have given 18 that consistent answer I have understood you to consider 19 it was almost a duty on your part if someone was at any 20 risk or threat that you would wish them to take it to 21 the appropriate authorities? 22 A. You are counsel, if someone comes to you and says, "I've 23 got a telephone call and I am in threat of my life", you 24 don't say go home and have some Horlicks and go to 25 sleep, you say to him, "Let's take it somewhere".</p> <p style="text-align: center;">Page 154</p>	<p>1 A. Correct. 2 Q. Thank you. 3 You will forgive me for going into that detail, it 4 is just that sometimes this case has not been very 5 accurately reported and so when we have a professional 6 witness -- 7 A. I think I need to make the point to you, I have 8 explained to you that I deal with a number of these 9 cases. 10 Q. Yes. 11 A. In normal contexts somebody would come and explain the 12 situation to you and you would say to him, "Are you 13 concerned, are you worried?" And he would say, "No I am 14 dealing with it". 15 Now, from my perspective where I am sitting in my 16 world, I may think, you know, how can you be thinking 17 like this, but that is just how it is. 18 Q. Yes. 19 Your sole purpose in making the telephone call to 20 the duty detective sergeant, it might be thought 21 ironically, Mr Gherson, was to avoid the very scenario 22 which has in fact occurred? 23 A. Correct. 24 Q. I think you remain confident that you did expressly 25 refer to the need to avoid a repeat of the Litvinenko</p> <p style="text-align: center;">Page 156</p>

1 affair?
 2 **A. Correct.**
 3 Q. Because you, given your professional practice base, were
 4 acutely conscious of the near inevitability of
 5 conspiracy theories otherwise?
 6 **A. Leaving aside conspiracy theories or anything else, or**
 7 **assumptions, the rule of law applies, you need to get**
 8 **the facts. The way to get the facts is to conduct**
 9 **proper tests. I was asking the police to ensure that**
 10 **they conducted the proper tests.**
 11 Q. Yes. I must ask you just a couple of other things in
 12 your statement, please, if you would turn up paragraphs
 13 14 and 15, and just read them to yourself.
 14 As you are doing so I will read them aloud:
 15 "There is nothing in any instructions given to
 16 either of my firms in Mr Perepilichny's lifetime which
 17 has any bearing on the cause or the circumstances of his
 18 death."
 19 You stand by that?
 20 **A. Correct.**
 21 Q. You stand by 15, which is really, I accept,
 22 a reiteration of what you said earlier,
 23 "Mr Perepilichny did not express any concerns for his
 24 safety"?
 25 **A. Correct.**

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1 Q. Yes.
 2 When it came to that telephone call to Detective
 3 Sergeant Drinkwater, I think you were under some
 4 pressure that day because you had a New York flight and
 5 trip, yes?
 6 **A. It wasn't just pressure, I was frustrated. I had**
 7 **conveyed the message, I was trying to convey it again.**
 8 **I was short of time. And the guy was questioning me as**
 9 **to who I am, why I was making the call, what basis I was**
 10 **calling and I was giving him information for him to be**
 11 **able to ascertain my credentials and he was not**
 12 **responding.**
 13 Q. Please understand, I was not criticising you.
 14 **A. No, I was not taking it as a criticism. It was**
 15 **an explanation.**
 16 Q. I was trying to reflect the context, which is you were
 17 trying to get a flight that afternoon to New York, as
 18 you have told us. It is fair to say, isn't it,
 19 Mr Gherson, and it is not a criticism, it may be
 20 a positive attribute but you are capable of speaking
 21 sometimes very rapidly?
 22 **A. I said that in my statement.**
 23 Q. You did indeed. You concluded that paragraph of your
 24 statement, paragraph 20, with these words:
 25 "I would not have told DS Drinkwater that in recent

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1 weeks Mr Perepilichny had expressed concerns for his
 2 own safety, because that did not happen."
 3 **A. I had not seen him in the recent weeks before his death.**
 4 Q. Yes, but you might have telephoned him, can you --
 5 **A. I have no record, recollection of speaking to him, or**
 6 **seeing him in the weeks before his death.**
 7 Q. So the reason you couldn't have told him that is you
 8 simply had no opportunity to have that conversation?
 9 **A. On my records, as best as I am able to ascertain, I did**
 10 **not see him or speak to him in the weeks before his**
 11 **death.**
 12 Q. Yes.
 13 Finally this, in relation to that rather convoluted
 14 matter concerning Mrs Perepilichnaya's fear that people
 15 might be able to go through the Met Police to get her
 16 address, the only reason you made a call to the police
 17 was because one of your clients, namely her husband,
 18 effectively asked you to do so?
 19 **A. He asked me to do so. Not her, because she didn't speak**
 20 **English to me.**
 21 Q. Yes.
 22 **A. He asked me to do so. He did not at the time, when he**
 23 **asked me to do that, express any fear or anything else**
 24 **other than what he asked me to do.**
 25 MR BEGGS: Mr Gherson, thank you very much.

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1 **A. Thank you.**
 2 MR HOPPER: I am sure everybody will be entirely delighted
 3 to learn I have no questions.
 4 THE CORONER: Nothing else.
 5 MR SKELTON: Nothing from me, sir.
 6 THE CORONER: Thank you very much, Mr Hopper.
 7 MR MOXON BROWNE: Sir, before Mr Gherson is, as it were,
 8 discharged, can I just raise one matter.
 9 I learnt and it may be my fault for the first time
 10 this afternoon there had been a telephone call between
 11 Mr Gherson and Mr Travers, the senior coroner for
 12 Surrey.
 13 We would respectfully suggest that that is in the
 14 nature of low-hanging fruit as far as proportionate
 15 further inquiry is concerned, and although I have no
 16 reason to think that Mr Gherson would need to address
 17 anything that might be found, I would ask you to take
 18 the necessary steps, if you think it appropriate, and
 19 that Mr Gherson should be aware of that.
 20 Further questions from MR SKELTON
 21 MR SKELTON: Sir, can I clarify, did Mr Gherson actually
 22 speak to Mr Travers, are you sure it was Mr Travers?
 23 **A. We contacted the coroner's office, they wanted a letter**
 24 **of authority. A letter of authority was sent. I don't**
 25 **know if you have a copy of that? I can give it to you.**

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1 Q. I do not have a copy of it with me right now.
 2 **A. I can get you a copy of this authority and in order to**
 3 **have got to that stage we would have had to engage with**
 4 **them to get the letter of authority.**
 5 **To find out that they wanted a letter of authority,**
 6 **we had to speak to them to be able to --**
 7 THE CORONER: When you say "we", is that you doing that or
 8 someone in your office or can you not remember.
 9 **A. I will go back and have a look and come back on Monday**
 10 **if you wish.**
 11 MR SKELTON: I think the critical thing to do, sir, is
 12 establish who Mr Gherson spoke to. It would be the
 13 ordinary way of things that you would not speak directly
 14 to a coroner who is seized of an investigation.
 15 **A. When I said I spoke to Mr Travers, I don't know who**
 16 **I spoke to but we spoke to the coroner's office because**
 17 **they asked for a letter of authority, a letter of**
 18 **authority was produced and a letter of authority was**
 19 **sent. I am sorry, I thought you had it but I will get**
 20 **you a copy.**
 21 MR SKELTON: Sir, perhaps we can conduct a few
 22 investigations and it may be Mr Gherson can as well just
 23 to establish if there is any record of the recipient of
 24 the call from the coroner's office, it may be
 25 Mr Mansbridge rather than Mr Travers.

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1 THE CORONER: Yes, all right.
 2 Thank you very much.
 3 MR SKELTON: Sir, time is marching on, we probably need
 4 a break for the sake of the stenographer.
 5 THE CORONER: Yes.
 6 MR SKELTON: I understand that there is some evidence still
 7 to be read out and I think it will need to be discussed
 8 whether that is feasible to be done today. Also we have
 9 the media issue, which has been held over for the day.
 10 THE CORONER: Yes, who is here to deal with that?
 11 MR SKELTON: He is outside court I gather, counsel. He is
 12 awaiting the call.
 13 THE CORONER: All right.
 14 MR SKELTON: After the break perhaps we could address that
 15 and perhaps take a decision about whether or not it is
 16 feasible to --
 17 THE CORONER: Quite. Yes, certainly.
 18 All right, we will have the break now.
 19 (3.36 pm)
 20 (A short adjournment)
 21 (3.56 pm)
 22 THE CORONER: We will just do some decisions about the read
 23 evidence and then something about the Litvinenko Inquiry
 24 and then -- where is Mr Callus? There he is, we will
 25 come to you, if you would just bear with us for

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1 a moment.
 2 Ruling
 3 THE CORONER: I have already announced I am going to admit
 4 the written evidence of Mr Ruslan Gursky,
 5 Mr Perepilichnyy's brother-in-law, contained in a letter
 6 dated 3 September 2016, save where he purports to give
 7 opinion evidence, that I would also admit relevant parts
 8 of his email to Mr Suter, the solicitor for the inquest,
 9 dated 1 May 2017.
 10 In a witness statement dated 24 May 2017, Mr Suter
 11 described the steps that had been taken to contact
 12 Mr Gursky and to secure his attendance in person or by
 13 way of video-link. At the time of that statement
 14 Mr Gursky was not responding to communications from
 15 Mr Suter on my behalf.
 16 On 4 June 2017, however, Mr Gursky responded to
 17 a further request for him to give evidence at the
 18 Inquest, saying that he was not willing to confirm his
 19 participation in the Inquest or to give evidence by
 20 video-link. Only Hermitage objected in general terms to
 21 the admission of Mr Gursky's written evidence.
 22 Although, like Hermitage, Legal & General also objected
 23 to the admission of purported expert evidence in
 24 paragraphs 8 and 10 of his letter dated
 25 3 September 2016.

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1 The basis of Hermitage's objection was that
 2 Mr Gursky had not offered any good reason why he would
 3 not attend and, they pointed out, that there would be
 4 various matters they would wish to put to him if he did
 5 attend.
 6 It is correct to say that Mr Gursky has not provided
 7 me with a good reason why he will not attend to give
 8 evidence, even by video-link. I cannot compel him to
 9 attend.
 10 In common with interested persons, I would also like
 11 to have put questions to him. The upshot is then that
 12 questioning will not have been possible and nor will
 13 I have had the opportunity to see his demeanour.
 14 Nonetheless, in this instance I think these matters
 15 go to weight and not to admissibility.
 16 In order to be admissible under Rule 23(1)(c) of the
 17 Coroners' Inquest Rules 2013 I have to be satisfied that
 18 there is a good and sufficient reason to believe that
 19 the maker of the written evidence will not attend to
 20 give evidence. I am so satisfied in light of the
 21 correspondence with Mr Gursky, but I shall approach the
 22 material with special care because of the limitations
 23 I have outlined and because of the absence of a good
 24 reason for his non-attendance.
 25 I will not admit the second and third sentences of

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<p>1 paragraph 8 and the last sentence of paragraph 10, which 2 are purported expert evidence. 3 The first sentence of paragraph 8 does not fall into 4 that category and I will admit it. 5 I also decided to admit the evidence of 6 Mr Rishat Ismagilov, another brother-in-law of 7 Mr Perepilichnyy, contained in his letters dated 8 31 August 2016 and 8 May 2017. 9 In a witness statement dated 17 May 2017, Mr Suter 10 sets out the contact that he has had with Mr Ismagilov 11 and it is clear that he will not assist me by giving 12 evidence in person or by video-link. Both Hermitage and 13 Legal & General have objected to the admission of this 14 evidence on the basis of the lack of a good reason for 15 Mr Ismagilov not to attend and on the basis that they 16 strongly dispute his evidence and would like to test it. 17 It is also submitted that, should I admit his 18 evidence, then I should not cherry pick parts of it so 19 that a proper assessment can be made of his credibility. 20 Indeed Mr Browder has given evidence in response to 21 certain claims made by Mr Ismagilov and suggests that 22 the fact that he has written to me in the terms he has 23 may be relevant to the cause of death. Legal & General 24 also say that the fact that Mr Ismagilov has written in 25 the terms he has is important, but not as evidence of</p> <p style="text-align: center;">Page 165</p>	<p>1 of Mr Francois-Roger Micheli, contained in his letter 2 dated 4 July 2016, along with the reasons for declining 3 to assist further in his email dated 9 September 2016, 4 letters dated 31 March and 7 April of this year, and in 5 the correspondence from the Swiss Ministere public de la 6 Confederation dated 1 June 2017. Mr Micheli is 7 declining to assist further. 8 He did so initially on the basis that I should 9 approach him formally by way of a request to the Swiss 10 authorities for mutual assistance. Once I did so, he 11 then rely on legal professional privilege which he 12 considers to cover his dealings with Mr Perepilichnyy 13 and because they did not have contact outside of their 14 professional relationship. 15 The Swiss authorities have confirmed that he is 16 entitled to avail himself of such protection. 17 None of the interested persons formally objects to 18 the admission of his evidence, although Hermitage say 19 they dispute the contents of his evidence, particularly 20 insofar as he says that Mr Perepilichnyy did not feel 21 threatened. They also submit that it is relevant that 22 he has not provided a good or sufficient reason for not 23 attending, certainly insofar as what is not covered by 24 privilege is concerned. 25 Again, I have not had the opportunity to observe his</p> <p style="text-align: center;">Page 167</p>
<p>1 the truth of its contents. 2 As with Mr Gursky's evidence, I can't compel 3 Mr Ismagilov to attend and I am satisfied that there is 4 good and sufficient reason to believe that he will not 5 attend to give evidence, and so I have the power to 6 admit the evidence under Rule 23(1)(c). Much of his 7 evidence is controversial and cannot be tested. I also 8 note that he has not provided me with a good reason why 9 he will not give evidence. I acknowledge the points 10 made by Hermitage as to his credibility and the reasons 11 why they say he may be writing to me in the terms that 12 he has. Again, I will not have had the opportunity to 13 observe his demeanour. 14 Nonetheless, this is relevant evidence and 15 Mr Browder himself relies on it in his second witness 16 statement. 17 I have decided to admit the letters in their 18 entirety so that a proper assessment of them can be 19 made. In doing so, I shall again proceed with special 20 caution because of the limitations I have outlined. 21 Under Rule 23(4) I do not have to have those parts 22 I have admitted read out in court but I intend to have 23 most of it read out, save for a summary only of some of 24 his points about the inquest process. 25 Finally, I have also decided to admit the evidence</p> <p style="text-align: center;">Page 166</p>	<p>1 demeanour or to see his evidence tested. 2 Again, I will bear all those limitations in mind and 3 proceed with special care when considering what weight 4 to give Mr Micheli's evidence. But as with the brothers 5 in law, I will admit the correspondence that I have 6 identified under Rule 23(1)(c). Having given the above 7 summary of his reasons for declining to attend, I intend 8 to read out the evidence contained in his letter dated 9 4 July 2016 only. 10 Pursuant to Rule 24, I am going to admit certain 11 findings from the Litvinenko Inquiry, set out by the 12 chairman, Sir Robert Owen, in his report "The Litvinenko 13 Inquiry: report into the death of Alexander Litvinenko". 14 The report was presented to Parliament pursuant to 15 section 26 of the Inquiries Act 2005 and ordered by the 16 House of Commons to be printed on 21 January 2016. 17 Paragraph 8.1 of the report, Sir Robert Owen 18 identifies that he records his factual findings in parts 19 8 and 9. Part 10 is a summary of his conclusions. I am 20 going to admit the following findings contained in those 21 parts. The findings in part 8 and summarised in 22 paragraphs 10.6 to 10.13 of part 10 that: 23 "(1) Mr Litvinenko died as a result of acute 24 radiation syndrome caused by ingesting polonium 210 on 25 1 November 2006.</p> <p style="text-align: center;">Page 168</p>

<p>1 "(2) he ingested the fatal dose of polonium whilst 2 drinking tea in the Pines Bar of the Millennium Hotel 3 that afternoon. 4 "(3) he was deliberately poisoned by Mr Lugovoy and 5 Mr Kovtun placing polonium in the teapot at the Pines 6 Bar that day. They did so with the intention of 7 poisoning him. 8 "(4) the two men had made an earlier attempt to 9 poison Mr Litvinenko using polonium at a meeting on 10 16 October 2006. 11 "(5) they knew they were using a deadly poison and 12 that they intended to kill Mr Litvinenko ..." 13 But Sir Robert did not believe that they knew 14 precisely what the chemical they were handling was or 15 the nature of all of its properties. 16 I am also going to admit the findings contained in 17 chapters 4.6 to 9 and 11 and 12 of part 9 and summarised 18 in paragraphs 10.14 and 10.16 of part 10. 19 In summary this sets out. 20 (1) in chapter 4 of part 9, findings about 21 Mr Litvinenko's fight against organised crime and the 22 collusion as Mr Litvinenko saw it between organised 23 crime and members of the FSB and in one instance 24 a personal relationship between a criminal gang leader 25 and Mr Putin.</p> <p style="text-align: center;">Page 169</p>	<p>1 concerning the killings of a number of President Putin's 2 opponents, as well as the attempted poisoning of 3 Viktor Yushchenko and Ana Politkovskaya, and the deaths 4 from apparent poisoning of four others. Sir Robert 5 described the evidence of Russian state involvement in 6 most of these deaths as circumstantial but relied on the 7 pattern of events as being of contextual importance to 8 the circumstances of Mr Litvinenko's death. 9 Sir Robert's overall conclusion in this part of the 10 report was that leading opponents of President Putin, 11 including those living outside Russia, were at risk of 12 assassination. One of risks they faced was that of 13 being poisoned. 14 (5) in chapter 9 of part 9, findings as to links 15 between Lugovoy and Kovtun and the Russian state. 16 (6) chapter 11 of part 9, Sir Robert's conclusions 17 about Russian state responsibility for Mr Litvinenko's 18 poisoning, including the strong circumstantial open 19 evidence of Russian state responsibility and his overall 20 conclusion based on open and closed evidence that it is 21 probable that when Lugovoy and Kovtun poisoned 22 Mr Litvinenko they did so under the direction of the 23 FSB. 24 (7) chapter 12 of part 9, Sir Robert's analysis of 25 the level of involvement and advanced knowledge of</p> <p style="text-align: center;">Page 171</p>
<p>1 Findings as to the plausibility that one or more 2 members of Russian crime gangs had Mr Lugovoy and 3 Mr Kovtun kill Mr Litvinenko. 4 Findings as to the motive for such a murder, and 5 Sir Robert's finding that the murder was not in fact 6 commissioned by members of criminal gangs. 7 (2) in chapter 6 of part 9, Sir Robert's overall 8 assessment of Professor Service's evidence to the 9 Inquiry, evidence that Mr Browder has sought to rely on 10 in this Inquest. 11 (3) in chapter 7 of part 9, findings that the use of 12 polonium is a strong indicator of state involvement, in 13 part because ordinary criminals might have been expected 14 to use a more straightforward, less sophisticated means 15 of killing but also because it must have come from 16 a reactor, which are in general under state control. He 17 also found that Russia was one possible source. 18 (4) in chapter 8 of part 9, findings as to the 19 reasons why organisations and individuals within the 20 Russian state might have wished to target Mr Litvinenko, 21 including by killing him in 2006 and, more particularly, 22 findings as to the evidence of similar deaths and 23 killings recited by Sir Robert from paragraphs 9.129 24 onwards. 25 This includes his findings about the evidence</p> <p style="text-align: center;">Page 170</p>	<p>1 Mr Patrushev, the then head of the FSB and 2 President Putin in the FSB operation to kill 3 Mr Litvinenko and his conclusion that they both probably 4 approved the operation. 5 Any interested person is entitled to see a copy of 6 the Inquiry findings if he or she so wishes. 7 Right. 8 MR FEAR-SEGAL: Sir, before Mr Wastell addresses you perhaps 9 I might just say something about the progress of 10 insurer's requests for documents, which have been 11 progressed quite substantially in the background by your 12 solicitor working with the police. You will remember 13 that we were searching for the previously obscure 14 business transition evidence from ST/01, 15 Mr Perepilichnyy's computer. 16 I understand that has now been located, accepted and 17 that we will receive a hard copy of it so we are very 18 grateful for the efforts that have been made on that 19 front. 20 MR MOXON BROWNE: Sir, might I just mention the statement of 21 Mr Whitworth which I had understood you might be 22 prepared to admit under Rule 23. 23 THE CORONER: We are going to do that in a moment. 24 MR MOXON BROWNE: I am sorry. 25 THE CORONER: No, you are quite right. Quite right.</p> <p style="text-align: center;">Page 172</p>

1 MR WASTELL: Mr Moxon Browne steals my thunder, that was my
2 next topic of business.
3 THE CORONER: He has.
4 MR WASTELL: Sir, the intention had been to read out the
5 statements Mr Micheli, Mr Gursky and Mr Ismagilov as
6 well as Dr Black now, but I fear we will not have time.
7 The one short statement it would be appropriate to
8 admit and read now is the third witness statement of
9 Mr Russ Whitworth, dated 19 June 2017, in which he deals
10 with a point that was raised with him in evidence and it
11 is appropriate simply to tie that off now.
12 THE CORONER: Quite.
13 MR WASTELL: Sir, there are no observations to this, we
14 understand, so you can admit it under 23(1)(d), it is
15 Mr Whitworth, the claims and underwriting director for
16 Legal & General, dealing with that one point. They have
17 had a copy and can object. He says, sir, this.
18 Statement of MR RUSS WHITWORTH (read)
19 MR WASTELL: "My name is Russ Whitworth and I am the claims
20 and underwriting director for Legal & General Insurance
21 society, City Park, The Drove way, Hove.
22 "In this statement I refer to the society as L&G.
23 I refer to my first and second statements in this
24 matter, and to the evidence which I gave to the coroner
25 on Thursday, 8 June 2017.

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1 "In the course of giving evidence I was asked
2 whether L&G were at risk for £2 million as a result of
3 Alexander Perepilichny's death or whether the sum
4 insured by him was reinsured by L&G elsewhere in the
5 market. Whilst I knew that the risk was reinsured,
6 I was not aware of the percentage of reinsurance cover
7 because that was not something I had previously
8 considered and I had not anticipated the question.
9 I have now ascertained that 100 per cent of this risk is
10 covered by the reinsurance market. The coroner will be
11 aware that L&G's status as an interested person derived
12 from fact that L&G is the insurer who issued the policy
13 on Mr Perepilichny's life, as opposed to their
14 reinsurance treaty partners who are the ones at
15 financial risk in the event of his death.
16 "In order to answer the question put to me by
17 counsel in the course of my evidence whether L&G's
18 participation in this Inquest is for financial gain,
19 I would like to say that life insurers' profits derive
20 from selling policies at competitive rates and not from
21 querying or declining claims, which in general is not
22 good for our business."
23 THE CORONER: Yes, there we are. Thank you very much.
24
25

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1 Timetabling
2 THE CORONER: I am afraid I can't go beyond 4.50. There are
3 two things. We have Mr Callus to listen to on the
4 documents point.
5 Then there is also, just the question of where the
6 rest of us, not including Mr Callus, go after and that
7 will take a bit of time. It will not take a bit of
8 time. What I am anticipating, did we circulate the
9 dates in July?
10 Unless there is broad agreement, it is probably not
11 a best use, if there isn't of then trying to find other
12 days, if there is broad agreement, I think we have sent
13 round -- did we send round, we have sent round a letter,
14 haven't we, I think indicating broadly the further
15 inquiries that we have in mind.
16 Add to that, as I have said already and is still the
17 case, that I am considering the submissions that have
18 been made about the Buzzfeed article, I have that in
19 mind. Then there are the other matters I think in the
20 letter -- did it go yesterday? Yes.
21 I am still considering Mr Moxon Browne, your request
22 about Ms O'Connell, I have that in mind.
23 The starting point seems to be -- well I am
24 absolutely clear that we are not in fact going to
25 conclude today all the matters that I want looked into,

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1 so that is going to take a bit of time.
2 Hence what we sent round, I think, were some
3 possible dates towards the end of July.
4 Mr Beggs, I should have started this, really, not
5 merely for form's sake but because it is important, your
6 position, and that of those you represent, the family
7 more broadly.
8 I am very mindful of that and of the pressures that,
9 as it were, every day that goes by causes. I should
10 have started with that, but I have that well in mind.
11 What we have sent round are some possible dates
12 in July, in the hope that if they suited, that we would
13 have hopefully completed the further inquiries -- I mean
14 there are the results of a couple of letters of request
15 for example which are outstanding. We shall just have
16 to do everything we can there. That we might then
17 conclude the evidence and possibly then proceed to
18 submissions, but I just don't know how those dates
19 looked to everybody.
20 MS HILL: Sir, can I ask a question of clarification, we did
21 have some diary discussion at lunchtime. Were you
22 envisaging all four of the possible dates being used or
23 just one or two?
24 THE CORONER: I think we got rid of one.
25 MS HILL: You offered four dates in the same week.

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1 THE CORONER: There were three in the end -- I tell you what
 2 it worked out at. The best ones, for various reasons,
 3 looked like possibly 24th, 25th, 26th and what -- I mean
 4 it is very difficult to know, but we were contemplating
 5 that if we had the 24th and the 25th for evidence, not
 6 saying it would take all of those but rather than having
 7 to cram everything into one day, if there was the
 8 possibility of going into the Tuesday, the 25th, and
 9 then perhaps any submissions on the 26th.
 10 MS HILL: I think the email offered the 28th as well.
 11 THE CORONER: It did as well. That became less popular for
 12 reasons I will not --
 13 MS HILL: Right.
 14 THE CORONER: Did those dates look any --
 15 MS HILL: 26th is utterly impossible for me on a selfish
 16 level, it is inquiry closing submissions day that day,
 17 so I simply cannot be here, but that is just my own
 18 difficulties. Any other day that week is fine.
 19 THE CORONER: No, no, that is important.
 20 All right, anybody -- I just didn't see the results
 21 of it.
 22 MR BEGGS: Sir, I have difficulties that week as well. The
 23 only thing is I am beginning to guess that everyone is
 24 going to have one or two difficulties, if not more that
 25 week.

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1 THE CORONER: Quite.
 2 MR BEGGS: Rather than have a sort of Dutch auction --
 3 THE CORONER: No, that is why I said if it had been -- the
 4 longer this is going on, it becomes plain -- I mean it
 5 is never productive actually to do a date like this,
 6 I was just hoping that everybody might say, "Yes, those
 7 are all fine". As it were the more people who say there
 8 aren't, we will just have to put some things in
 9 correspondence and see where we end up.
 10 You can have a go? Did you want to.
 11 MR BEGGS: I don't want to -- I never find it attractive
 12 when one barristerial team tries to outbid another.
 13 MS HILL: Oh John, I thought we were being invited to
 14 indicate clear difficulties. I am sorry.
 15 MR BEGGS: Well, I will then, my clear difficulties are all
 16 of that week. I think I might be able to move one day
 17 but the point is that this will be an interminable
 18 debate that will waste your time.
 19 THE CORONER: I only embarked on it because I hoped it might
 20 know about the case, but it is.
 21 MR SKELTON: Sir, just for clarification we would like three
 22 days really because there is a danger of course that if
 23 we don't conclude the evidence within the time allotted
 24 we are bumped again, it is not of course apparent yet if
 25 we will need all three days. Certainly we are going to

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1 need one day at the very least for submissions and we
 2 are assuming one to two for factual evidence and two
 3 I think is putting it on the safe side. It may be it
 4 could be done in one day, but that is why a three-day
 5 slot is being looked for.
 6 If we don't conclude by the end of July then
 7 I anticipate August will be lost for reasons which we
 8 all know and we are looking then at September. We will
 9 liaise with dates in September as well I think and see
 10 if we can find a mutually convenient time.
 11 THE CORONER: Yes. All right. That is --
 12 MR SKELTON: Of course Mr Wastell reminds me he is reading
 13 a lot of evidence.
 14 THE CORONER: Of course, that is to look forward to.
 15 All right, there we are.
 16 Discussion re media disclosure
 17 THE CORONER: Mr Callus, no pressure, but here we are just
 18 after 4.20. What might be best, I don't know how much
 19 you have. I am not being flippant, you must obviously
 20 develop it but it might be the thing is you are going to
 21 have to, as it were, just do the things that you want
 22 done orally now and perhaps put something in in writing.
 23 MR CALLUS: I understand, I will try to take no more than
 24 five or ten minutes.
 25 THE CORONER: I am very grateful. I hope you have not come

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1 along and then felt under dreadful pressure.
 2 MR CALLUS: No, of course.
 3 Submissions by MR CALLUS
 4 MR CALLUS: I think given the number of documents that have
 5 actually been referred to in full in oral evidence,
 6 I understand that there is actually a relatively narrow
 7 dispute now as to what should be provided to BuzzFeed,
 8 which is essentially is a question of gold group
 9 minutes, whether the whole 30 pages as redacted and
 10 supplied to the interested persons by the direction on
 11 22 May should be provided. That is what we seek and it
 12 is the most of what we seek.
 13 Or whether we should be restricted to the mere two
 14 pages with additional further redactions that have been
 15 requested by the chief constable. Really the decisions
 16 for you are the whole 30 pages versus 2 pages and then
 17 that decision having been made, the existing degree of
 18 redaction or whether further redaction is necessary and
 19 we do say it is a necessity test.
 20 There is it no authority entirely on point, the
 21 closest I could find was the case of Great Atlantic
 22 Insurance, and for your note that is 1981 first volume
 23 of WLR, 529 where a privileged document, part of which
 24 had been referred to in open proceeding, led to the
 25 entirety of the document being disclosable and even

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<p>1 where it was privilege being protected rather than mere 2 confidentiality the entirety of the document was to go. 3 We say the normal rule in civil proceedings, CPR 4 31.22, now replaces the implied undertaking on what has 5 been disclosed but a whole document may be used for 6 collateral purposes if it is referred to, even in part, 7 in open proceedings. The burden then passes to the 8 party who seeks to restrict that by making 9 an application to the court under 31.22(2). 10 Sir, we say as a general rule, insofar as even part 11 of a document has been referred to in open proceedings 12 the entirety of the document then enters the public 13 domain and should be disclosable to the press, pursuant 14 to the open justice principle. 15 I am aware, sir, that you are already more than 16 familiar with general principles of open justice in 17 particular the Guardian and Westminster Magistrates 18 authority, so I will try to do this only by reference. 19 Helpfully the guidance produced by the then chief 20 coroner at paragraph 45 emphasises that what is 21 required, it is not a case of entitlement of the media 22 to documents, but it is a strong but rebuttable 23 presumption in favour of disclosure. 24 What is required against that is some strong 25 contrary argument or countervailing reasons, so</p> <p style="text-align: center;">Page 181</p>	<p>1 application would be refused under rule 15 if made by 2 an interested person. 3 In this particular case on 22 May it was decided 4 that the gold group meeting minutes could be disclosed 5 to the interested persons, albeit with some limited 6 redactions. It is not that you have to imagine the 7 hypothetical of whether or not it should be disclosed, 8 it already has been. I don't know if I can put it as 9 high as an issue estoppel or say that the police should 10 have raised their objections at that time, Henderson v 11 Henderson abuse, but it has been disclosed, it has been 12 entered into evidence. We say that a decision has been 13 made, albeit by your predecessor, as to its relevance in 14 the statutory sense. 15 More generally we say that it is misconceived to say 16 that it is irrelevant to this because it takes far too 17 narrow a view of open justice. 18 Into the Guardian v Westminster decision, I don't 19 know if you have it there but I will give you paragraph 20 numbers if not. 21 THE CORONER: I do. 22 MR CALLUS: Paragraph 76 Lord Justice Toulson, as he then 23 was, talked about the Guardian's serious journalistic 24 purpose in seeking access to documents: 25 "It wants to be able to refer to them for the</p> <p style="text-align: center;">Page 183</p>
<p>1 a compelling reason not to accede to a media request for 2 access is required. 3 Paragraph 48 of the guidance helpfully delineates 4 a non-exhaustive list of reasons, most of which do not 5 apply here. National security does not apply, public 6 interest immunity, it is not within the scope of those 7 rulings that you have made, there is no legal privilege. 8 Most of the time where there is resistance to 9 an open justice article 10 based application for access 10 to documents the countervailing reason is itself 11 a Convention right, article 2 always trumps, article 3 12 and article 8 often do. 13 We say that in respect of the gold group minutes, 14 there is no countervailing Convention right that can 15 apply, it is trite law the core public authorities don't 16 have them and the individuals in question were acting in 17 their professional public capacity not as private 18 citizens. 19 All that remains is the two arguments raised by the 20 Chief Constable for Surrey Police, one of which is 21 relevance and the other of which is confidentiality. 22 We say that both are misconceived. 23 Firstly, because one of the reasons that you could 24 refuse our application is by reference, you will see at 25 the bottom of paragraph 48 of the guidance, if the</p> <p style="text-align: center;">Page 182</p>	<p>1 purpose of stimulating informed debate about the way in 2 which the justice system deals with suspected 3 international corruption and system for extradition of 4 British subjects to the USA. Unless some strong 5 contrary argument can be made out, the courts should 6 assist rather than impede such an exercise." 7 This was not limited to the very narrow question of 8 whether or not the men in question should be extradited, 9 it was a look at the systemic benefits and disbenefits 10 of the way in which extraditions were conducted. We say 11 that that consisted with the House of Lords in the Home 12 Office in Harman, which is cited at paragraph 33 of 13 Guardian v Westminster. Where their Lordships, talking 14 about open justice in a contempt case, said: 15 "Justice is done in public so that it may be 16 discussed and criticised in public, where if trials 17 sometimes expose matters of public interest worthy of 18 discussion other than the judicial task of doing justice 19 between the parties in a particular case." 20 Where this came for decision in Guardian v 21 Westminster is really paragraphs 77 to 82. It is said 22 by Lord Justice Toulson at 79 that: 23 "The objection is based on too narrow a view of the 24 purpose of open justice principle. The purpose is not 25 simply to deter impropriety or sloppiness by the judge</p> <p style="text-align: center;">Page 184</p>

<p>1 hearing the case, it is wider. It is to enable the 2 public to understand and scrutinise the justice system 3 of which the courts are the administration." 4 We say insofar as evidence is not available to this 5 Inquest, because there were missed opportunities on the 6 part of the police, we say that in term of the 7 journalistic inquiry into the way in which the justice 8 system deals with unusual deaths and within the 9 jurisdiction, is very much relevant and that the 10 complaint about lack of relevance from the Chief 11 Constable is not actually about the statutory relevance 12 test that applies under Rule 15, it is about editorial 13 relevance. It is established by authority, in 14 particular paragraph 82 of Guardian v Westminster, that 15 the court should be very cautious about making what 16 would really be an editorial judgment about the adequacy 17 of the material already available to the paper for its 18 journalistic purpose. 19 We say relevance goes nowhere, relevance itself 20 cannot be a strong reason. 21 It cannot be a sufficiently strong countervailing 22 argument to deprive us of access to these particular 23 documents. 24 There not being public interest immunity certificate 25 in relation to this material, we say that there is</p> <p style="text-align: center;">Page 185</p>	<p>1 I don't know if you have in front you the gold group 2 minutes in question. They are at volume 2, page 578, 3 I think that is police volume 2. That is the original 4 insurers' volume 2. I think that is right. Is that 5 correct? No confidence about these page numbers now 6 after the other day. 7 Sorry, sir, it just might help you understand my 8 short submission. 9 THE CORONER: Yes. 10 MS HILL: Do you have page 578/7, as is the insurer's want. 11 THE CORONER: Yes. I think so. 12 MS HILL: My understanding, sir, is that the proposal is 13 that the document that has 578/7 is the one page from 14 this larger document that would be disclosed. You will 15 see the document itself begins at 578/1, it is the 16 minutes of the meeting of 28 November. Do you have 17 578/1, sir? 18 THE CORONER: Yes. 19 MS HILL: That is the front of the document, I think -- 20 THE CORONER: Yes. 21 MS HILL: -- so it is the minutes of the meeting of 22 28 November 2012. 23 THE CORONER: Yes. 24 MS HILL: My understanding is that because I referred in 25 questioning to the passage at the foot of 578/7, that</p> <p style="text-align: center;">Page 187</p>
<p>1 nothing really to be gained in terms of the plea of 2 confidentiality, it is not quite clear by whom and to 3 whom the confidentiality obligation is said to be owed. 4 But if there is a necessity for public interest 5 confidentiality to make sure that these meetings happen 6 with no prospect of the information making its way into 7 the media, then we say the appropriate route is for 8 there to be a public interest immunity certificate. If 9 it doesn't qualify for such and if there is not 10 an article 8 consideration, if there is not the sort of 11 harm that leads to an article 2 consideration, we say 12 that a mere generalised plea of confidentiality simply 13 does not amount to enough to deny us access to documents 14 that have been disclosed to the interested persons and 15 have been referred to in the course of oral hearings in 16 open court. 17 There are a number of decisions or authorities that 18 I could refer you to, but that might be easier if I do 19 that in writing and allow others in court to speak. 20 I am grateful, sir. 21 Submissions by MS HILL 22 MS HILL: Sir, I had a very short point to make that perhaps 23 just amplifies some of the submissions that have been 24 made by the media. It is simply one based on facts not 25 principle.</p> <p style="text-align: center;">Page 186</p>	<p>1 begins, "Organisational learning", do you see that with 2 the three bullet points, I think Mr Moxon Browne has 3 referred to it as well, that simply that page will be 4 disclosed. My submission is that the entirety of the 5 minutes should be disclosed so that that particular 6 passage can be seen in context, not least because if one 7 goes over the page one can see at the top of 578/8 that 8 that topic continues. 9 One can see that the issue of organisational 10 learning, which was raised at the foot of 578/7, 11 continues over the page. If as a general proposition 12 one sees one page of a document, in our submission there 13 is a greater risk of misunderstanding its context, it 14 would not even be apparent to the reader of 578/7 what 15 date this particular passage related to. 16 The same is true, sir, if one goes through the 17 bundle and looks at the second page, which begins 18 578/22. One finds 578/22, it is that page that refers 19 to the ambient political interest in the case. You will 20 see in the middle of 578/22, sir, towards the bottom, 21 where the Assistant Chief Constable is quoted as saying 22 that there was an ambient national level political 23 interest in the case, questions about international 24 interest in the case and so on. That was an area of 25 questioning that again I took I think Officer Pollard</p> <p style="text-align: center;">Page 188</p>

<p>1 to, but one can see that that topic continues over the 2 page. 3 It is a short point based on the facts as well as on 4 the principle, that there is a danger, sir, in our 5 submission in providing simply one page of a document to 6 the media as a general proposition, but in particular on 7 these particular minutes. 8 I have to say I had understood the submissions went 9 slightly more wide than what my learned friend for the 10 media has addressed you on. I had understood that there 11 were still issues around other documents but you have 12 our broad submission I think, sir, in writing. 13 I had understood that there were still some issues 14 around the FLO documents and so on, which my learned 15 friend for the media has not addressed you on. 16 I am not sure if you will have been made aware of 17 the submissions from Mrs Perepilichnaya this afternoon, 18 for example, I don't know if he knows exactly that, but 19 our broad position in relation to all of these is in 20 favour of disclosure to the immediate. We have no issue 21 at all with the personal material being redacted, we 22 understand the reasons for that and we take no issue 23 with that, but our broad submission is simply in 24 relation to particular pages merit the entirety of that 25 set of minutes for example being disclosed.</p> <p style="text-align: center;">Page 189</p>	<p>1 was, they wouldn't even understand what the focus of the 2 meeting was. Unless you see the whole document you 3 don't understand, I think, how it all fits together. It 4 comes rather out of context. That is the normal 5 position in civil proceedings for example, as far as 6 I understand it. 7 As I say, I am not making the submission that the 8 3 December minutes that have not been referred to should 9 be disclosed. 10 THE CORONER: All right, thank you very much. 11 MS HILL: Sir, that is all I wish to say on the media. As 12 I say I have two short other points but shall I come 13 back? 14 THE CORONER: Is that all on the media one. 15 MS HILL: No, it is on the separate issue from the letter 16 from yesterday. 17 THE CORONER: Shall we come back to that later. 18 Anybody want to say anything else about this? 19 MS BARTON: I do, sir. 20 THE CORONER: Yes. 21 Submissions by MS BARTON 22 MS BARTON: Sir, I think with respect we have to start with 23 your powers in this. Which are contained very clearly, 24 as a starting point, within the chief coroner's 25 guidance.</p> <p style="text-align: center;">Page 191</p>
<p>1 Sir, that is all we wish to say on the media. 2 I would wish at some point to address you very, very 3 briefly indeed on two short points on the letter from 4 yesterday, but perhaps I can do that later. 5 THE CORONER: What is the position -- I understand that if, 6 as it were, you go over the page to see the thing in its 7 context or the whole of the topic. But what if the 8 topic that has been referred to in the whole of a long 9 document is, as it were, a discrete topic and there 10 hasn't been any reference to anything else that is in 11 the document? 12 The same could be said that you then need to see 13 this document in the context of all these ones, that 14 might be a point, there is probably something in that 15 but I mean that would not mean would it that I would 16 say, "All right, have a copy of all of these", or would 17 it you say? 18 MS HILL: I am not making a submission, for example, that 19 the intervening gold group minutes, there is another set 20 of minutes here from 3 December that nobody has referred 21 to, I am not making a submission that they should be 22 disclosed. I am simply saying if you are going to 23 disclose page 578/7, if a member of the press read that 24 page they would not understand who any of the initials, 25 they wouldn't understand what the date of the meeting</p> <p style="text-align: center;">Page 190</p>	<p>1 THE CORONER: Yes. 2 MS BARTON: Paragraph 27 to 31: 3 "The coroner may provide any document or copy of any 4 document, including recordings." 5 It is a discretion that you have. 6 Then at paragraph 28 it sets out the factors which 7 in making your decision you should take into account, 8 the person requesting the document, while we accept that 9 they have the necessary locus, the media, the reason for 10 the request, and I ask you to underline that, because 11 I am going to come back to that as an issue, because in 12 paragraph 82 of the Guardian case it was clear that 13 cogent evidence was put forward from the Guardian as to 14 the need for the material. 15 The public interest, and that is not just the public 16 interest, sir, in the public having access to open 17 justice, it is the public interest which vests in the 18 document itself emanating from the police and the 19 confidentiality which may or may not attach to it. The 20 sensitivities of particular passages, we can deal with 21 those via redactions and have done, need for editing, 22 other relevant factors. 23 Your discretion is set out clearly there. The issue 24 then is the test to be applied. 25 Sir, may I indicate that your provisional ruling</p> <p style="text-align: center;">Page 192</p>

<p>1 requires disclosure of the pages of the minutes and 2 reports referred to, subject to redactions. We don't 3 seek to go behind that, we don't ask you to disclose 4 nothing. We are content for the purposes of this 5 hearing to live with the provisional ruling you have 6 made. But our submission is that it should go no 7 further. 8 The reason for that is, if one goes to the 9 Guardian -- 10 THE CORONER: If a point was as it were half dealt with -- 11 I have to look at the whole thing, but Ms Hill's point 12 about if a point is half dealt with on one page and you 13 go over and there is the, as it were, complete point, 14 you need to have the next page. That is slightly 15 different from, as it were, the whole of the document. 16 MS BARTON: It is slightly different but we would say in 17 this particular case, that that point must be relevant 18 to the Inquest in the first place. 19 We would say that whilst missed opportunities may be 20 relevant only insofar as it means that evidence is not 21 available, then to go on and discuss any more about that 22 doesn't pass the basic relevance test. This comes back 23 to the basis upon which the Chief Constable in this case 24 disclosed material to your predecessor. 25 Because there is such a vast amount of material in</p> <p style="text-align: center;">Page 193</p>	<p>1 doesn't apply to inquests. 2 My submission is that that must be the starting 3 point, should that part of the document be before the 4 court at all, and if it is for pragmatic reasons then 5 that would not be a good basis for disclosure. 6 We would say that there is a several-stage test. 7 I would draw your attention to paragraph 82 of the 8 Guardian, which states at follows: 9 "The Guardian put forward credible evidence that it 10 was hampered in its ability to report as fully as it 11 would have wished by not having access to the documents 12 which it was seeking." 13 I pause there, sir, because if one reads the 14 totality of the report in the Guardian, it is quite 15 apparent that there were oblique references to the 16 documents, perhaps to deliberately prevent the press 17 from reporting particular parts of those reports, and it 18 was very difficult, if one reads the totality, to 19 understand what point was being made. 20 That is not the case here, there has been the most 21 extensive investigation of all of the issues in this 22 case and it would be very difficult, in our submission, 23 to say that anyone sitting in this court or reading the 24 transcripts does not understand the issues that have 25 been raised, the answers to them and the responses.</p> <p style="text-align: center;">Page 195</p>
<p>1 this case, as is often the case with inquests where 2 there is particular public interest, the decision was 3 taken to disclose those documents unredacted and 4 untested for relevance. 5 Indeed, at an earlier hearing your predecessor made 6 the point that the fact that he was in possession of 7 that material and for pragmatic reasons was going to 8 disclose all of that material to the IPs, that did not 9 make the material relevant. 10 What we would say is that much of this material has 11 not been referred to for very good reason, in that it is 12 not relevant to this hearing. If it is not, it is 13 perhaps fortuitous that the court has it, but it should 14 not be used as a platform for disclosure, and that is 15 a very important -- 16 THE CORONER: There was reference earlier to the document 17 having been entered into evidence and I'm bound to say 18 I am not sure that has happened at all, has it? 19 MS BARTON: No, in our submission that has not happened. 20 What has happened is there is in evidence passages of 21 that document and the test is not the same as it is for 22 a civil action where there is a long line of authorities 23 that reference to a particular document, particularly 24 where it is privileged or would attach legal 25 professional privilege weighs that privilege. That</p> <p style="text-align: center;">Page 194</p>	<p>1 The groundwork in our submission is not made out in 2 any event, the basic test. 3 Sir, you then go to the test which must be applied 4 which is at paragraph 85. The test is: 5 "To carry out a fact-specific proportionality 6 exercise [this is important] evaluating the potential 7 value of the material in advancing the purpose of 8 an open justice principle against any risk of harm which 9 access might cause to the legitimate interests of 10 others." 11 Our submission is that this material has no value at 12 all in the context of an inquiry which has been as far 13 reaching as this one. It adds nothing to the totality 14 of the understanding of those who have either listened 15 to or read the transcripts in this case. 16 Our submission would be that that test is simply not 17 satisfied. Even if the media were able to say, "Well, 18 there is some advantage by having some additional 19 material", that is the stage at which the risk of 20 harm -- we say it is a very real risk in this case -- 21 comes into play. 22 It comes into play in two ways. 23 Firstly, in relation to the FLO reports, my learned 24 friend for the media made the assertion that there is no 25 authority on the confidentiality issue. There is</p> <p style="text-align: center;">Page 196</p>

<p>1 a wealth of authority, only some of which we have 2 referred to in our skeleton argument, but beginning with 3 Bunn, moving on to Frankson and culminating in the more 4 recent case of the Countess of Caledon, all of which 5 says that. To sum it up: 6 "It is clear beyond doubt that confidentiality 7 attaches to what is said to the police in the course of 8 a criminal investigation, and that applies whether the 9 person giving the information is a suspect who is 10 interviewed under caution or merely a potential 11 witness." 12 That must be the public interest which you are 13 weighing against the advantage that there would be to 14 the public in general, and the media in particular, of 15 disclosing this additional material. 16 There is further, and we would say overwhelming, 17 public interest in the context of family liaison 18 officers' reports. You will have seen from the evidence 19 in this case that a breakdown in the communication 20 between family liaison officers and families cause very 21 real difficulties for police investigations. Indeed the 22 way in which this particularly developed in this case 23 was regrettable in the extreme. 24 MR CALLUS: I am sorry, sir, I think I can save us some 25 time. I don't think I addressed the confidentiality of</p> <p style="text-align: center;">Page 197</p>	<p>1 look at what is being asked for in the context of the 2 material which is already in the public domain and the 3 additional benefits that that will give. 4 We have prepared a short list, which I will have 5 typed up and sent to you, of the particular passages 6 which you referred to. If one is looking at the 7 understanding of those passages, in the large part the 8 entire passage was read out and so there is actually 9 nothing to be gained and this would appear to be 10 a fishing exercise to see what else there is in those 11 documents which might be of general interest to the 12 media. And that cannot be a proper purpose. 13 Sir, we will provide that list to Mr Suter so that 14 anyone who wants to look at the transcripts can compare 15 the passages that are in the public domain. 16 THE CORONER: Thank you very much. 17 MS WHITE: Sir, I am very conscious of the time may I ask 18 for just five for ten minutes more to address you on the 19 interests of the widow and her children. 20 THE CORONER: Yes. 21 Submissions by MS WHITE 22 MS WHITE: You have been taken to the test already in 23 paragraph 85 in the Guardian News case. You are 24 concerned with a fact specific proportionality exercise 25 and in particular central to the court's evaluation will</p> <p style="text-align: center;">Page 199</p>
<p>1 the FLOs or indeed the FLOs at all. We take no issue 2 with that. Our point was about the confidentiality of 3 the gold group minutes, so we can skip this. 4 MS BARTON: I am grateful for that. 5 Then the issue for you, sir, is simply to weigh the 6 confidentiality against the benefits to the media of 7 having this additional material. We would say that the 8 confidentiality far outweighs the additional benefits, 9 not least because there is a wider public interest of 10 encouraging the cooperation of families in 11 investigations of this type and if they think there is 12 going to be a more wide scale disclosure than is 13 absolutely necessary for the litigation or fact finding 14 inquiry, there is going to be a real danger of damage in 15 the future to police investigations and to their 16 relationships with families. 17 The gold group minutes, I can deal with quite 18 shortly because I say that the vast majority of those 19 minutes is absolutely irrelevant. It falls within my 20 submissions on pragmatic disclosure earlier and I would 21 say that if the material should not have been disclosed 22 or would not have been disclosed to the coroner, and 23 from then to the IPs, then it certainly does not fall to 24 be disclosed to the media. 25 Sir, lastly, it is important in our submission to</p> <p style="text-align: center;">Page 198</p>	<p>1 be the purpose of the open justice principle, the 2 potential value of the material in advancing that 3 purpose and conversely any risk of harm which access to 4 the documents may cause to the legitimate interests of 5 others. 6 The legitimate interests which I wish to refer to 7 are those of the widow and her children. Those 8 interests are reflected in the guidance document which 9 Ms Barton has referred to but she has not referred to 10 a couple of other paragraphs where potential reasons for 11 refusal of access to documents are set out, in 12 particular paragraph 48 which refers to the protection 13 of personal information, particularly in the case of the 14 vulnerable, which is sensitive or if disclosed could 15 give rise to a risk of harm. 16 The article 8 rights of witnesses or others 17 identifiable who may need to be protected from the glare 18 of publicity, there may for example be a good reason for 19 refusing access to the contents of a suicide note, even 20 though it has been referred to in court. There may be 21 good reason to limit or refuse the wider broadcast of 22 certain images, video or audio footage even if they were 23 seen or heard in open court. 24 Paragraph 49: 25 "The rationale for protecting personal information</p> <p style="text-align: center;">Page 200</p>

<p>1 which is sensitive or could give rise to a risk of harm 2 or be damaging or would breach any right of confidence, 3 is specially for the vulnerable such as children, the 4 mentally disabled or the elderly or infirm, is that 5 there is no obvious public interest in publicity." 6 Sir, there are two sets of documents where the widow 7 would wish to make submissions. 8 Firstly the FLO reports and secondly the EFG 9 material, by which I mean the Proximal report and the 10 CIP, the two CIP reports. 11 Before I come on to those specific submissions, can 12 I make three general observations about the context of 13 this request for disclosure of documents. 14 The first relates to the FLO records. As you know, 15 sir, those reports record conversations with the widow 16 which took place shortly after the stress and trauma of 17 her husband's sudden death, when she was bereaved, when 18 she had sole responsibility for two young children, 19 children under the age of 10. When she was speaking 20 a foreign language in a foreign country and was isolated 21 and, quite understandably, very anxious about the 22 arrangements for her husband's funeral and for the 23 release of her husband's body. 24 Sir, on any view, she was in that situation 25 a vulnerable individual. In those circumstances, she</p> <p style="text-align: center;">Page 201</p>	<p>1 reason for emphasising that, sir, and for drawing it to 2 your attention is that significant harm has already been 3 done to the widow and her children, to their privacy, 4 and to their trust and confidence in these proceedings 5 in relation to disclosure. It is that unhappy incident 6 in January of last year which is, in my submission, 7 an important contextual point. 8 The third of the three contextual points is the 9 point which has been referred to many times now, both by 10 the witnesses and my leading counsel. There has been 11 a very high volume of intrusive, highly speculative and, 12 on more than one occasion, inaccurate media reporting. 13 Not only during this hearing, but over some years now. 14 You will be well aware, sir, that four years, seven 15 months and counting is on any view an inordinately long 16 time for inquest proceedings to run and an inordinately 17 long time for a private widow and her children to suffer 18 sustained media intrusion of that nature connected to 19 these proceedings. 20 So the length of it and the nature of it. 21 It is, from the widow's part, entirely unsolicited. 22 The same cannot be said necessarily of others but on the 23 widow's part entirely unsolicited and of course those 24 who suffer the worst from that coverage are her 25 children, who have to hear and read about it.</p> <p style="text-align: center;">Page 203</p>
<p>1 had and has a legitimate expectation that the records of 2 those conversations will remain confidential. You have 3 heard from Surrey Police in relation to the wider 4 principle, the public interest, but the widow is the 5 particular case, the concrete facts. 6 The second general contextual point is about the 7 history of disclosure of information within these 8 proceedings. This is before your time, sir, before your 9 appointment, before the appointment of, if I may say, 10 your extremely skilled coronial team, your solicitor and 11 your two counsel. 12 Before your collective appointments in January 2016, 13 January last year, the widow suffered the unilateral 14 disclosure of police documents, HOLMES material, prior 15 to any redactions of personal information, the standard 16 DPA redactions which are always applied, with the result 17 that her children's names, details, school addresses, 18 phone numbers, were disclosed to all the interested 19 persons in these proceedings. It was as a result of 20 that very unfortunate wide ranging disclosure that the 21 confidentiality undertakings referred to by Mr Suter in 22 his emails were introduced at our request, once we were 23 instructed a couple of months later. 24 We are very grateful to the other interested persons 25 for faithfully respecting those undertakings but the</p> <p style="text-align: center;">Page 202</p>	<p>1 That is the context which we invite you to keep in 2 mind. In relation to the particular documents, as 3 I say, there are two sets of documents with which the 4 widow is particularly concerned. 5 In relation to the FLO reports, our primary 6 submission is that those should not be disclosed. We 7 support the issue of principle, canvassed by Surrey 8 Police in their written submissions, ie the public 9 interest in those documents remaining confidential, but 10 as I say we also say that the widow has a legitimate 11 interest in those records of those conversations 12 remaining confidential because of the circumstances in 13 which those records were made. 14 If they are to be disclosed, sir, you have our 15 submissions which were put in by our solicitors by 16 letter of 20 June referring to the particular matters 17 which the widow wishes to be redacted from any FLO 18 reports, if any are to be disclosed. 19 In relation to the EFG material, as I say I am 20 referring there to the Proximal report and the two CIP 21 reports. Again, our primary submission is there is not 22 a sufficient reason that has been demonstrated by those 23 requesting these documents and there is a countervailing 24 legitimate interest held by the widow and her children 25 in the information in those documents remaining</p> <p style="text-align: center;">Page 204</p>

<p>1 confidential.</p> <p>2 If those documents are to be disclosed, sir, the</p> <p>3 widow would respectfully invite you to redact the names</p> <p>4 of all companies in those documents. Save for those of</p> <p>5 Baikonur and Quartel, which we accept have been referred</p> <p>6 to on numerous occasions throughout these proceedings.</p> <p>7 Can I just make the following short submissions on</p> <p>8 the company details, sir, and then I will be finished.</p> <p>9 We invite you to treat those company documents with</p> <p>10 particular care because they contain information which</p> <p>11 would not otherwise be in the public domain. These</p> <p>12 documents come from files held by our client's bankers</p> <p>13 which would not otherwise be disclosed without her</p> <p>14 specific consent. Of course they have been provided to</p> <p>15 you, sir, and your team in your capacity as the coroner</p> <p>16 in this Inquest, but they contain private commercial</p> <p>17 information pertaining to businesses and people who work</p> <p>18 for those businesses who have legitimate article 8</p> <p>19 rights.</p> <p>20 Those companies' details and names have been given</p> <p>21 to these IPs subject to the confidentiality undertakings</p> <p>22 that I referred to. Therefore they have been available</p> <p>23 to advocates if they wish to ask questions about them</p> <p>24 insofar as those questions might be relevant to the</p> <p>25 matters you have to determine.</p> <p style="text-align: center;">Page 205</p>	<p>1 Submissions by MR SKELTON</p> <p>2 MR SKELTON: I will try a cut a principled and pragmatic</p> <p>3 pathway through the submissions you have heard because</p> <p>4 it is fair to say I probably agree with a bit of</p> <p>5 everything.</p> <p>6 As far as the principle is concerned, there is</p> <p>7 clearly an obligation on you, sir, as a coroner in these</p> <p>8 proceedings to provide access to the public to those</p> <p>9 proceedings, that includes access to the media, but it</p> <p>10 is discretionary as to the access to the documents which</p> <p>11 are put in evidence before this court. Hence that point</p> <p>12 is made clear in the guidance that we have seen from the</p> <p>13 chief coroner.</p> <p>14 The extent to which the access is granted is of</p> <p>15 course the important issue here.</p> <p>16 Again, two aspects to that.</p> <p>17 One is relevant, relevant information,</p> <p>18 ie information that is evidence that is probative of the</p> <p>19 how question, how did Mr Perepilichny die, may be dealt</p> <p>20 with in the open in the hearing and in order to</p> <p>21 facilitate understanding of that evidence access to</p> <p>22 a document or information that has been given in the</p> <p>23 hearing will be given to the media ordinarily in the</p> <p>24 course of these proceedings. That is the usual way of</p> <p>25 these sorts of high profile cases.</p> <p style="text-align: center;">Page 207</p>
<p>1 They have not, in my submission, formed the subject</p> <p>2 of any detailed cross examination. There has, it might</p> <p>3 be suggested, been reference to these documents in the</p> <p>4 public transcripts, but we are talking about disclosure</p> <p>5 beyond the disclosure of those publicly available</p> <p>6 transcripts. In my submission, questions of publicity</p> <p>7 and disclosure are questions of degree. It is a fact</p> <p>8 specific proportionality exercise and it does not</p> <p>9 require the further disclosure of the company details in</p> <p>10 these particular documents.</p> <p>11 They are of no direct relevance to the issues in</p> <p>12 this case and they are sensitive information.</p> <p>13 We have heard, as I say, from numerous witnesses and</p> <p>14 the media in their articles about the agendas of</p> <p>15 persons, both inside and outside court, in publicising</p> <p>16 these proceedings. Those interests are not shared by</p> <p>17 the widow, they are not shared by these companies or the</p> <p>18 people working for them and those are legitimate reasons</p> <p>19 for not disclosing that information.</p> <p>20 Sir, unless I can assist any further that is all</p> <p>21 that I have to say.</p> <p>22 THE CORONER: Thank you very much.</p> <p>23 MR SKELTON: Sir, I have to be exceptionally quick I think</p> <p>24 because we have already run over time.</p> <p>25 THE CORONER: All right.</p> <p style="text-align: center;">Page 206</p>	<p>1 Likewise, if there is a document which is not</p> <p>2 strictly directly relevant but which is necessary to</p> <p>3 understand the evidence, or a passage of a document,</p> <p>4 that document may in your discretion be released, but</p> <p>5 those are discretionary decisions and it is not the case</p> <p>6 that the entire document is released automatically,</p> <p>7 because usually the entire document will not be needed</p> <p>8 to provide either an understanding of the relevance</p> <p>9 evidence or to put the evidence properly in its context.</p> <p>10 Sir, Ms White is right to raise the issue of</p> <p>11 confidentiality undertakings. We referred to evidence,</p> <p>12 but in fact it is just a large volume of documentary</p> <p>13 information that was put into various files which are</p> <p>14 within these court proceedings, only a fraction of which</p> <p>15 has actually been referred to but all of which is</p> <p>16 subject to undertakings which have all been signed up to</p> <p>17 by the interested persons. The reason they signed up to</p> <p>18 those undertakings is because they contain a vast swathe</p> <p>19 of information which is irrelevant, which may be</p> <p>20 sensitive on different grounds, commercially and</p> <p>21 otherwise, and which is not really necessary to elicit</p> <p>22 during the course of the public hearings.</p> <p>23 The release from that undertaking one needs to look</p> <p>24 at carefully. We have been careful, I have been careful</p> <p>25 in my questions to focus on issues which are of strict</p> <p style="text-align: center;">Page 208</p>

<p>1 relevance to the how question and to eschew asking 2 questions about documents or parts of documents which 3 are not relevant.</p> <p>4 You will of course, sir, be familiar with the fact 5 that there are categories of confidence with which this 6 court must take notice, so for example public interest 7 immunity, which has been the subject of separate 8 proceedings, or local professional privilege which 9 raised its head during the course of Mr Gherson's 10 evidence today. This court must take those sorts of 11 concerns seriously and it must do so based on evidence 12 and not simply assertion. There are, however, lesser 13 forms of confidence, personal private information, 14 commercially sensitive information which you have 15 a discretion to protect without that full blown hearing 16 that one associates with public interest immunity or 17 potentially legal professional privilege. It is that 18 kind of information that one is seeking to protect here.</p> <p>19 In my submission, sir, you need to look at the gold 20 group minutes and assess whether or not they are 21 relevant in their entirety and if they are irrelevant 22 then this question simply falls away.</p> <p>23 That, sir, is the approach which is adopted by most 24 major inquiries and inquests in this country. So, for 25 example, the 7/7 Inquest if one tries to look at</p> <p style="text-align: center;">Page 209</p>	<p>1 the single page which was directly referred to, then 2 there may be good bases for saying a further passage 3 should be disclosed. It doesn't automatically in these 4 proceedings trigger a disclosure of the entirety of the 5 document. That simply is not the way inquests work.</p> <p>6 Nor, sir -- this is not of course a primary 7 argument -- is it pragmatic to do that. If one looks 8 behind us, we are dealing with hundreds and hundreds of 9 documents here, huge amounts of files.</p> <p>10 THE CORONER: One asks where does it end, to say that it is 11 very useful to see how the police undertake an inquiry 12 of this kind. First of all, that is not really the 13 issue that I am concerned with.</p> <p>14 Secondly, I mean all this material might help about 15 that.</p> <p>16 MR SKELTON: If it is referred to and some of it was 17 referred to very much in passing to set things in 18 context but the actual information contained in those 19 document is simply irrelevant.</p> <p>20 Sir, I think cutting a path through this. One 21 balances principle and pragmatism and discloses what we 22 propose to disclose, which is simply that evidence 23 referred to directly so it can be seen in context.</p> <p>24 THE CORONER: Do you want to say anything else? 25 MR CALLUS: I think given the hour it might be better --</p> <p style="text-align: center;">Page 211</p>
<p>1 documents referred to by witnesses in evidence one will 2 not see the entirety of the document, you will just see 3 those sections. Likewise in the Independent 4 Investigation into Child Abuse in this country, which 5 Ms Hill is involved in and which I am involved in, 6 documents referred to in the hearing are only partially 7 disclosed on the website by the Inquiry and not in their 8 entirety in order to facilitate understanding.</p> <p>9 In the case of the gold group minutes, without going 10 into detail, they were referred to primarily by 11 Mr Pollard and actually only on a very narrow basis. 12 Much of what the gold groups contain is really about how 13 the police went about their investigation. This 14 investigation by you, sir, is not an investigation of 15 the police investigation so the gold group minutes are 16 not directly probative of the how question.</p> <p>17 THE CORONER: If, as it were, you turn over the page then 18 the bit that you have been looking at that was referred 19 to as it were is then seen properly in context and so 20 on, I will have to look at that and see whether that is 21 a case, that is one thing, isn't it, but if --</p> <p>22 MR SKELTON: It is, and I agree with Ms Hill's point. If 23 one simply cannot understand the evidence that was 24 either given by the witness by reference to the 25 transcript or being present in court or by reference to</p> <p style="text-align: center;">Page 210</p>	<p>1 THE CORONER: Put it in writing. 2 I am obviously just going to reflect on what has 3 been said. I have to look at the point that Ms Hill 4 made, I have not turned over the page really and looked 5 at it so I am going to do all that.</p> <p>6 If anybody wants to put anything else in then 7 obviously they can.</p> <p>8 MR CALLUS: I trust that I can send my submissions to the 9 secretary to the inquiry.</p> <p>10 THE CORONER: Would you? That would be so helpful. 11 If we said close of play next Friday?</p> <p>12 MR CALLUS: I was going to say Monday, sir.</p> <p>13 THE CORONER: Would you? Do that then. Monday. 14 Good, that is more than enough.</p> <p>15 MR SKELTON: Sir, so we conclude today, to return, time to 16 be fixed --</p> <p>17 MS HILL: I just wanted to make two very, very short points 18 if I may, sir.</p> <p>19 THE CORONER: Yes. 20 Housekeeping</p> <p>21 MS HILL: Simply that we received your letter yesterday, 22 obviously, that responded to a large amount of 23 suggestions that were made for further investigations. 24 Plainly you have not yet made a decision on the Buzzfeed 25 issue.</p> <p style="text-align: center;">Page 212</p>

1 The only point I would make is that obviously it is
 2 in everyone's interests to keep the momentum, such as
 3 there is, on the case moving.
 4 This is a significant issue and we would hope that
 5 a decision can be made as soon as possible. Because, as
 6 we have suggested in the letter, there would need to be
 7 a minimum period of time allowed for a response to that.
 8 We would also ask for, as I believe I said before,
 9 the opportunity to make representations on the format of
 10 the wording if a request is going to be made. That was
 11 a process that the previous coroner adopted when
 12 requests were made of the Government before. I simply
 13 put a marker down that if we are even to look at the end
 14 of July, any request would have been to made fairly soon
 15 to make that vaguely realistic.
 16 The second point is just very briefly, sir, in our
 17 letter we have made the point that there is at least one
 18 Regulation 28 issue on which we would wish to address
 19 you --
 20 THE CORONER: Yes.
 21 MS HILL: -- around this issue of intelligence. There is
 22 a fundamental concern among my clients that they have
 23 been raising issues about the KOCG for many, many, many
 24 years and to have heard evidence that there was
 25 effectively a nil return on intelligence is something

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1 that we appreciate from your email yesterday you are not
 2 minded to explore at the moment, but I would wish to
 3 have the opportunity to make oral Regulation 28
 4 submissions at least on that.
 5 THE CORONER: All right.
 6 MR SKELTON: Sir, very briefly on that. You have already
 7 indicated, sir, that you are considering the Buzzfeed
 8 matter.
 9 THE CORONER: Yes.
 10 MR SKELTON: I will repeat what I said before, which is one
 11 must proceed cautiously and carefully whenever one deals
 12 with matters involving national security, particularly
 13 those involving a foreign government.
 14 Secondly, as far as Regulation 28 goes, we are quite
 15 far away I am afraid from that point at the moment, but
 16 no doubt it will be the subject of submissions in due
 17 course.
 18 THE CORONER: Yes.
 19 Good. All right. Well that is it for now.
 20 Thank you all very much for your help over the last
 21 days and we will get back to you just as soon as we can
 22 as to the next dates, but I repeat my thanks to
 23 everyone.
 24 (5.10 pm)
 25 (The Inquest adjourned)

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