

<p>1 Friday, 9 June 2017 2 (10.00 am) 3 MR WILLIAM BROWDER (continued) 4 THE CORONER: Good morning, thank you for coming back. 5 A. Thank you. 6 MS HILL: Sir, good morning, before my learned friend 7 continues his questioning of my client. Can I put 8 a very brief marker down, that my client was obviously 9 asked a lot of questions yesterday by your counsel about 10 the extent to which he offered protection to the 11 deceased. That issue came as something of a surprise to 12 us, it had never been trailed with us in advance before, 13 it was not any part of the basis for my client being 14 recognised as an IP. Obviously I have not therefore 15 been able to take any instructions on it. 16 I just put that marker down now, sir, because my 17 client obviously has given evidence about it, no doubt 18 will be asked further questions and be re-examined about 19 it. But in the spirit of fairness, I think if there 20 were a need for any further evidence so that you have 21 a full picture on that issue if you consider it 22 relevant, it may be that it is necessary for me to come 23 back on it. 24 THE CORONER: All right, understood, thank you for 25 mentioning that.</p> <p style="text-align: center;">Page 1</p>	<p>1 of being murdered if such people who committed this 2 murder are allowed to get away with it. 3 And so from our perspective, it is a matter of 4 potentially life and death to get to the truth of this 5 matter, and it is worth spending time, energy and 6 resources to get to the truth of this matter. 7 Q. Did you lose money when the three companies you referred 8 to yesterday were effectively stolen by this organised 9 crime group? 10 A. We lost a de minimis amount of money. As I mentioned 11 yesterday in my answers to the counsel to the coroner, 12 all of the assets that we had in Russia had been taken 13 out of Russia by the time those companies were stolen 14 and so the main cost to us was roughly \$15,000 of cash, 15 as opposed to the many millions that we previously had 16 in Russia. 17 Q. Now, you and I had a minor quibble as to whether you had 18 described Mr Perepilichny yesterday as -- I put it as 19 "explosively valuable", on reading the transcript 20 I discover what you actually said was he was "so 21 explosive and valuable": 22 "... his evidence was so explosive and valuable, it 23 looked like he was too good to be true". 24 You were referring there to the matters you have 25 just explained to me?</p> <p style="text-align: center;">Page 3</p>
<p>1 Yes. 2 Questions from MR BEGGS 3 MR BEGGS: Mr Browder, good morning. 4 Can I start just by asking you a few questions about 5 Hermitage Capital Management? 6 A. Sure. 7 Q. Is it a trading company as we speak? 8 A. Yes, it is. 9 Q. Does it have shareholders or investors? 10 A. No, it doesn't. 11 Q. Are you the sole owner? 12 A. I am the sole owner. 13 Q. What is the benefit to the company of being involved in 14 this Inquest? 15 A. There is no benefit to the company. 16 Q. Why is the company involved then? 17 A. Because we believe that there is a strong probability 18 that Alexander Perepilichny was murdered, we believe 19 that that murder came about because of his exposing the 20 money laundering of the Klyuev organised crime group. 21 If he was murdered for exposing the Klyuev organised 22 crime group then the people who did murder him got away 23 with murder and since we are in the business of exposing 24 the Klyuev organised crime group for the purposes of 25 justice, it puts people close to me and myself at risk</p> <p style="text-align: center;">Page 2</p>	<p>1 A. Correct. 2 Q. You said -- this is a small reprise just before I push 3 on -- yesterday that the Russian criminals, state 4 sponsored or otherwise, are capable of overseas 5 executions involving sophisticated undetectable methods? 6 A. That's correct. 7 Q. You gave some examples, car crashes, fires and 8 poisoning? 9 A. Correct. 10 Q. You said that you and some of your close colleagues take 11 a variety of complex confidential, understandably 12 confidential measures to protect yourselves. 13 A. Yes. 14 Q. Yet to this valuable witness, giving explosive evidence 15 in pursuit of all of the objectives you have just 16 identified, I think your evidence from yesterday is 17 clear that at no stage did you or your colleagues cause 18 him to be given any advice whatsoever about security? 19 A. Well, let me offer some additional information, which is 20 that we did introduce him to several lawyers in the 21 process of our relationship with him. One of them is 22 a very renowned lawyer named Roger Gherson, and 23 Roger Gherson would be the type of person that would 24 advise him better than us on these types of issues 25 because he advised us on these types of issues.</p> <p style="text-align: center;">Page 4</p>

<p>1 Q. In answer to my question -- because you are of course 2 right that he retained Roger Gherson, Hermitage, you 3 your servants or agents gave him no hints, advice about 4 personal security? 5 A. Well, in my analysis, and I wasn't the one meeting with 6 him but in my analysis, he was Russian, he was 7 potentially connected to some of the people who were 8 part of this criminal organisation. If anyone can 9 assess the danger of what he was doing, it would be him. 10 Q. Is there a reason why you won't just give a straight 11 yes/no answer because it admits -- that particular 12 question admits of a straight yes or no answer? 13 A. What is your straight yes or no question? 14 Q. You don't remember it? 15 A. Just repeat it, if you are asking -- we are talking 16 about different subjects here. 17 Q. Your company's servants or agents gave no security 18 advice to Mr Perepilichny at any stage? 19 A. Not that I am aware of. 20 Q. That, just to recap from yesterday, includes the 21 situation after he reveals to you the existence you say 22 of a dossier upon which he is one of a number of targets 23 by an assassin? 24 A. That's correct. 25 Q. Indeed it goes further, doesn't it, because not only did</p> <p style="text-align: center;">Page 5</p>	<p>1 A. Okay, well ... 2 Q. It comes to this, not only did you do nothing to advise 3 him about his safety, you actually further publicised 4 his contribution to your campaign, didn't you? 5 A. Well, we did publish the Barron's article on our 6 website. 7 Q. Your website is a heavily hit website, as you told us 8 yesterday? 9 A. Well, as I told you yesterday, the main -- what I 10 testified to yesterday was that the YouTubes were 11 heavily downloaded. I would have to check to see how 12 many people, if any, downloaded the article about the 13 Stepanov letter. 14 Q. Can I ask you to reflect on whether the agreed facts 15 that I have elicited from you over the last couple of 16 minutes, is that the usual way that you treat a valuable 17 whistleblower? 18 A. I -- there is no usual way in which we treat 19 whistleblowers because there are not that many 20 whistleblowers that we deal with. 21 Q. Isn't it common knowledge that whistleblowers are to be 22 protected rather than exposed? 23 A. Of course. 24 Q. You see I also suggest it is not usual for highly 25 sophisticated well funded, well lawyered companies like</p> <p style="text-align: center;">Page 7</p>
<p>1 you not give him any advice, as you finally admitted, 2 but you actually republicised the fact that he was 3 a whistleblower, didn't you? 4 A. I am confused. In what context? 5 Q. Why are you confused, because you are someone who claims 6 to be able to give evidence in a witness statement more 7 than five years after material events, you claim you are 8 able to do that but you are apparently not able to 9 remember with perspicacity that which you said yesterday 10 when you made clear -- indeed in answer to 11 an interjection from the learned coroner -- that you 12 republicised the fact that Perepilichny had come 13 forward as a whistleblower because you, as it were, 14 republicised the open letter to Navalny. 15 Why are you confused about that, Mr Browder? 16 A. I am confused as to what facts you are referring to, if 17 you could make your questions more clear then I can make 18 my answers more clear. 19 Q. It is perfectly clear. You republicised on the 20 Untouchables website the open letter in which 21 Mr Perepilichny is named as a whistleblower, didn't 22 you? 23 A. I believe we did. 24 Q. Yes, well you know that you did because you told the 25 coroner that yesterday under oath.</p> <p style="text-align: center;">Page 6</p>	<p>1 yours to make zero contemporaneous notes of critical 2 meetings. That is also not usual, I suggest to you. 3 THE CORONER: Well I think we did do the notes. 4 MR BEGGS: We have. 5 Let me move on. 6 What I am saying to you, Mr Browder, just so you 7 understand my theme, is that your evidence is pitted 8 with striking incongruities, isn't it. 9 A. No. 10 Q. One of the other incongruities is, I am going to suggest 11 and put it to you that you and your company have been 12 responsible for placing florid stories in the media and 13 then subsequently relying on those self-same stories as 14 if they are evidence admissible in this court. You have 15 been doing that, haven't you, for four or five years 16 now? 17 A. No, I haven't. 18 Q. As Mr Skelton took you to yesterday, Brown Rudnick 19 in January 2012 wrote an exceptionally detailed letter 20 which the learned coroner has seen at bundle 1, 232, 21 I needn't turn it up again, in which they set out in 22 immense detail the risk that presented itself according 23 to you to certain people in this country. You recall 24 that, don't you? 25 A. I do.</p> <p style="text-align: center;">Page 8</p>

<p>1 Q. That letter we see from January was only a matter of 2 two, two and a half months after the so-called hitman 3 dossier, wasn't it? 4 A. I would have to go back and look at the dates. 5 Q. You really have to look back on the dates? 6 A. Yes. 7 Q. Let me remind them, and I hope I do so fairly, Ms Hill 8 will interrupt if I don't. Your evidence yesterday, and 9 in your witness statement, was that the hitman dossier 10 was November 2011. 11 A. Okay. 12 Q. The Brown Rudnick letter that Mr Skelton took you to is 13 dated 20 January 2012. 14 A. Okay. 15 Q. I hope I wasn't being unfair when I said two and a half 16 months or thereabouts later you are writing this 17 immensely detailed letter which includes the issue of 18 risk to various personnel, yes? 19 A. That's correct. 20 Q. As Mr Skelton elicited and I apologise for repeating it 21 but it may be rather important, not a solitary 22 reference, even en passant, to Mr Perepilichny? 23 A. That's correct. 24 Q. Lest that letter be taken out of context, perhaps you 25 can confirm that it wasn't the first of its type because</p> <p style="text-align: center;">Page 9</p>	<p>1 and almost bloodcurdling because at paragraph 34 it is 2 suggested that not only were Hermitage executives at 3 risk and their lawyers, but even their family members, 4 including potentially their young children, do you see? 5 A. I do. 6 Q. This was a siren call from you two years before the next 7 letter, yes? This was an enduring theme emerging from 8 Hermitage to law enforcement, wasn't it? 9 A. As I corrected the counsel to the coroner yesterday, the 10 following -- the subsequent letter to the City of London 11 Police was not about the threat of life and death, it 12 was about the request to open a criminal investigation 13 into money laundering of the Klyuev organised crime 14 group and the issues of death threats were put in as 15 background to, for them to understand the gravity of the 16 situation and why this was not just a victimless money 17 laundering case. 18 Q. I suggest the incongruity is that these highly expert 19 top flight lawyers had been writing these letters with 20 similar themes about threats to kill, including of 21 children, and yet despite that expertise, despite that 22 thematic sustained approach, no mention of the gentleman 23 who you say was on a hit list. That is the incongruity 24 I put to you. 25 A. So first of all you should refer properly to the</p> <p style="text-align: center;">Page 11</p>
<p>1 two years earlier, on 1 March 2010 to be precise, for 2 the learned coroner's note 1/220, Brown Rudnick had 3 written a very similar letter, hadn't they? 4 A. I would have to refer to the letter, if you want to show 5 me. 6 Q. By all means, it is bundle 1. 7 A. Yes. 8 Q. It is page -- in my bundle anyway, it is divider 10, 9 page 220. 10 A. I've got it right here. 11 Yes. 12 Q. What I am suggesting to you, hopefully quickly, is this 13 letter is to much the same effect as the letter that 14 followed 22 months later. 15 A. No. 16 Q. Well I don't want to fence with you but paragraph 2 17 says: 18 "The purpose of writing to you is to set out 19 Hermitage's formal request for UK law enforcement 20 agencies to devise an effective strategy to prevent 21 murder of UK residents in the UK by ..." 22 In effect the KOCG -- 23 A. Correct. 24 Q. -- yes? 25 The letter was, it might be thought, rather intense</p> <p style="text-align: center;">Page 10</p>	<p>1 letters, because as I said the second letter was not 2 a request -- 3 Q. I am doing it for speed, Mr Browder, in case you are in 4 any doubt because you want to be away by 12.30. I am 5 flagging it to the coroner, I am citing the main two 6 paragraphs, I think you know that I am not trying to be 7 unfair, I am dealing with a 4simple incongruity. 8 A. But no, you are being unfair. As I said, you can try to 9 put words in my mouth but I won't let you do that. 10 Q. I don't think I would succeed in that. 11 A. You will not do that. 12 THE CORONER: All right, you are making the point that the 13 City of London letter was for the purposes of trying to 14 get a Serious Organised Crime Act Inquiry -- 15 A. A money laundering case open, yes. 16 MR BEGGS: Perhaps I can finish this line by asking you 17 this, since you have the sophistication, intelligence 18 and strategy to write to instruct Brown Rudnick to write 19 the letter they did, the one preceding the one that 20 Mr Skelton referred to, why did you not do the very same 21 at the very latest after the hitman dossier? 22 A. As I testified yesterday, we said -- we took the view 23 that we had an arm's length relationship with 24 Alexander Perepilichny, that he was not a member of my 25 team, he wasn't an employee, he was not a family member</p> <p style="text-align: center;">Page 12</p>

1 **and he was not our responsibility to look after, he**
 2 **could look after himself based on his own level of**
 3 **knowledge of the Russian criminal group, who he knew**
 4 **better than we did.**
 5 Q. You see I suggest to you that there are two alternatives
 6 to this, what I suggest is an incongruity, I accept you
 7 don't accept that. It's either that you really did
 8 think there was a real risk to him, but you simply
 9 disregarded it, that is one option. Or you knew very
 10 well that there wasn't a risk to him but that you are
 11 now exaggerating it. Do you see?
 12 **A. No.**
 13 Q. Which of those is it?
 14 **A. It is not either of those.**
 15 Q. So that you understand how I put this case on behalf of
 16 the widow, what I am suggesting is that you have
 17 deliberately, after the event, distorted and exaggerated
 18 the evidence?
 19 **A. No.**
 20 Q. I suggest you have done that because your motives are
 21 not quite as pure as you would like the world and this
 22 coroner to believe.
 23 **A. That is not true.**
 24 Q. A small example of that was illustrated yesterday when
 25 you were forced to strike through the "S" in "death

Page 13

1 threats" because you realised you had made a mistake.
 2 Do you see?
 3 **A. That doesn't -- that doesn't demonstrate anything other**
 4 **than a clerical error.**
 5 Q. I suggest that someone of your intelligence,
 6 sophistication with top flight lawyers doesn't make
 7 a clerical error on something of such central
 8 importance, namely the level of threat, if any, to
 9 Mr Perepilichny, do you see?
 10 **A. No, I don't.**
 11 Q. You accept I think, as we have heard from two witnesses
 12 in this case, that Mr Perepilichny was an intelligent
 13 man?
 14 **A. That's correct.**
 15 Q. We know that he had studied and worked in Russia for
 16 many years. You know that, don't you?
 17 **A. Yes.**
 18 Q. Indeed, for what it is worth, he had studied in Russia
 19 and worked in Russia for many years even before you went
 20 there I think in the mid-1990s.
 21 **A. He was Russian, so he would have been there before me.**
 22 Q. Yes, and he continued to have business interests in
 23 Russia even after you were expelled, didn't he for
 24 a number of years?
 25 **A. That's correct.**

Page 14

1 Q. His knowledge of Russia, its culture, its criminal
 2 gangs, corruption and so forth was every bit as great as
 3 yours if not greater by dint of experience?
 4 **A. I would assume so.**
 5 Q. Yes, and you also know that he had a family of a wife
 6 and two children for which he was the sole breadwinner.
 7 You know that, don't you?
 8 **A. Yes.**
 9 Q. You probably know that he took the education of his
 10 children exceptionally seriously?
 11 **A. I do not have any knowledge of that.**
 12 Q. All right.
 13 What I am suggesting to you is that a man of this
 14 experience of Russia and its business conditions, of
 15 this intelligence, of this manifest commitment to his
 16 children and wife, if he had perceived any risk to his
 17 personal safety, he would have been in a position to
 18 take protective measures, wouldn't he, you know that?
 19 **A. I believe that he felt at great risk to his personal**
 20 **safety in Russia and fled Russia at the end of 2009**
 21 **because of his problems with the Stepanovs and believed**
 22 **that he was safe in the United Kingdom, as many people**
 23 **believe because they think it is a safer country than**
 24 **Russia.**
 25 Q. That of course is a pure theory?

Page 15

1 **A. No, no, it is not a theory. This is what he told my**
 2 **colleagues, that he left Russia because he had fallen**
 3 **out with the Stepanovs and he was afraid of the things**
 4 **that were going to happen to him in Russia.**
 5 Q. This is what he told you colleagues?
 6 **A. That's correct.**
 7 Q. This is going to be in the ether, nothing that I can lay
 8 my hands on?
 9 **A. No, I believe that some version of this is in my witness**
 10 **statement.**
 11 Q. Is it? But we have to therefore take your word many
 12 years after the event for that?
 13 **A. Well, this is at the moment when we are actually**
 14 **discussing the evidence before the coroner.**
 15 Q. Have you listened or read the transcripts of other
 16 evidence that in fact he was concerned to get his two
 17 children into the best available schools, was not
 18 content with the Russian schools, eventually landed in
 19 English schools via an unsuccessful attempt in
 20 Switzerland. Have you given any consideration to that?
 21 **A. Yes, in the context of the same person saying that they**
 22 **knew nothing about the Stepanovs and other absolutely**
 23 **clear documented evidence, that doesn't sound very**
 24 **credible.**
 25 Q. I see.

Page 16

<p>1 What you are suggesting in that respect therefore is 2 that his widow has chosen to make that evidence up, is 3 that what you are suggesting? 4 A. I am suggesting that it doesn't -- that the evidence 5 that I heard doesn't correspond with the facts that I am 6 aware of. 7 Q. Is it not also an incongruity that a manifestly wealthy 8 man, we can all agree on that, perhaps not of your scale 9 but nonetheless very wealthy took not a solitary 10 security precaution? 11 A. That is not true. 12 Q. I'm sorry? 13 A. That is not correct. 14 Q. Well it is correct, because the evidence we have heard, 15 and there is no evidence to this court to contrary 16 effect? 17 A. That is wrong. 18 Q. Well, says you? 19 A. No, says the evidence. Would you like me to recount it 20 for you? 21 Q. What I would like you to do is give us a contemporaneous 22 record of that. 23 A. Let me give you the evidence of the precautions he was 24 taking. 25 Q. Do you have any contemporaneous form --</p> <p style="text-align: center;">Page 17</p>	<p>1 A. Was there a guarded compound or not? He asked me the 2 question. 3 Q. Are you saying that everyone lives in St George's Hill 4 is in fear of assassination? 5 A. I don't know, but obviously he chose to live in 6 St George's Hill -- 7 Q. Yes, lots of people choose -- 8 A. -- and he chose to live in a guarded compound and you 9 are saying he took no measures. I am correcting you. 10 Q. Then explain what he was doing for the period where he 11 lived from August 2010 to July of the following year, in 12 other words 11 months, in Virginia Water. That was not 13 guarded, was it? 14 A. And perhaps he didn't feel safe there. 15 MS HILL: Sir, I am not sure in fairness to Mr Beggs if 16 there is any direct evidence of the nature of the 17 previous property I would be grateful to be taken to it. 18 I am not sure we do know much about the previous 19 property. 20 THE CORONER: No, I certainly don't. 21 MR BEGGS: We have the evidence, Mr Browder says that 22 because you live in St George's Hill he thinks that is 23 indicative of a fear for personal safety. 24 THE CORONER: No, I think Ms Hill was saying we don't know 25 about Virginia Water.</p> <p style="text-align: center;">Page 19</p>
<p>1 THE CORONER: Just you answer, because you were talking over 2 each other. What were you going to say? 3 A. I was going to say that he is living in a guarded 4 compound in Surrey, that you can not get access to. You 5 know, if you are so casual about your security you don't 6 live in a guarded compound. So here is a man -- 7 MR BEGGS: Are you saying -- 8 THE CORONER: Just let him finish, sorry. 9 A. Here is a man who has told us he has left Russia because 10 he is afraid of the consequences of losing \$100 million 11 or some odd amount for the Stepanovs. He comes to 12 England, which he thinks is safe, but he doesn't think 13 it is that safe so he goes and gets himself a home in 14 a guarded compound where nobody can get access without 15 going through gates and security guards. 16 MR BEGGS: Have you not missed a step along the way, 17 Mr Browder, in your enthusiasm to adhere to this 18 conspiracy theory? Have you not missed the fact -- 19 A. It is not enthusiasm to adhere to a conspiracy theory, 20 I am trying to give evidence to the coroner who asked me 21 for the evidence. 22 Q. I note that that evidence is based on nothing recorded 23 contemporaneously. Let's move on. 24 A. Are you saying that there was no guarded compound? 25 Q. You choose to characterise it as that --</p> <p style="text-align: center;">Page 18</p>	<p>1 Was that your point? 2 MS HILL: That was my point. I would be grateful to be 3 corrected, as always, if I am wrong. 4 MR BEGGS: That can easily be resolved. 5 THE CORONER: All right, all right. 6 MR BEGGS: Can I turn to the Skype messages that you were 7 taken to. 8 You gave evidence yesterday that Andrei Pavlov, the 9 key lawyer as you described him for the Klyuev OCG went 10 by the Skype name of, I may be mispronouncing it, New 11 Rus.com? 12 A. Yes. 13 Q. How do you know that? 14 A. Because we have -- Andrei Pavlov's emails have leaked 15 into the public domain for a period of one year, of 16 which he uses that same email address. And there are 17 now court -- those emails have been used in courts which 18 have acknowledged the validity of his email and his 19 email address. 20 Q. Is there any evidence -- to pick up Ms Hill's point 21 about Virginia Water, so it is the like point -- before 22 this court that that Skype name is the same 23 Andrei Pavlov that you are referring to? 24 A. I believe there is but, you know, you would have to 25 speak to my counsel who know the evidence better than</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

1 **I do.**
 2 Q. Is the reality that you are giving evidence of what you
 3 have been told by others?
 4 **A. I have actually seen that myself in the dossier of his**
 5 **2012/2013 emails.**
 6 Q. Let me ask you about another stranger sounding Skype
 7 name, Bombarash 877(?), if I have pronounced that one
 8 right, whose is that one?
 9 **A. I don't know.**
 10 Q. You don't know?
 11 **A. No.**
 12 Q. The conversations that you purported to give almost
 13 expert evidence as to their contextual interpretation,
 14 you didn't participate in any of those conversations,
 15 did you?
 16 **A. Obviously not.**
 17 Q. No. Have you even spoken to any of the persons in those
 18 conversations?
 19 **A. No.**
 20 Q. You don't know what other contemporaneous conversations
 21 were going on, do you, whether by other forms of
 22 telephony, text, email?
 23 **A. No, I don't.**
 24 Q. It follows doesn't it, inexorably, that you don't know
 25 the full context of what is being said by either party?

Page 21

1 **A. That's correct.**
 2 Q. Just so we are clear as to the status of that part of
 3 your evidence, you are in no better position than the
 4 learned coroner to place a fair interpretation on those
 5 conversations?
 6 **A. No, that is not correct.**
 7 Q. You don't think -- you see what I am going to suggest is
 8 you are actually in less good position than the learned
 9 coroner because you suffer from confirmation or
 10 confirmatory bias is my suggestion to you. Do you know
 11 what that means?
 12 **A. I do.**
 13 Q. It is I think generally accepted to be a tendency to
 14 search for, interpret favour and recall information in
 15 a way that confirms one's pre-existing beliefs or
 16 hypotheses. That is precisely what you were doing
 17 when you went through those conversations, wasn't it?
 18 **A. No.**
 19 Q. Of course, I am sorry to repeat it but I have to, when
 20 you give evidence as to interpretation, you do it
 21 without a solitary contemporaneous note in relation to
 22 any of the material events?
 23 **A. I am sorry, in which -- what are you talking about?**
 24 Q. I am talking about the five or six conversations that
 25 Ms Hill took you to where you purported to give

Page 22

1 interpretation. You didn't have any other
 2 contemporaneous record with which to contextualise your
 3 purported interpretation, did you?
 4 **A. I have been living, breathing and eating this case for**
 5 **the last 10 years and I know all of the facts and**
 6 **situations around it and the reason that I was giving my**
 7 **interpretation to the coroner is because I have a sense**
 8 **of context which Detective Pollard wouldn't have,**
 9 **because he hasn't been living, breathing and eating this**
 10 **case for the last 10 years.**
 11 Q. Do you even admit of the possibility that you might even
 12 occasionally suffer confirmatory bias?
 13 **A. I don't believe in this case I am suffering from**
 14 **confirmation bias.**
 15 Q. Can I just ask you one aspect about the -- your
 16 interpretation of the discussions with Pavlov. I think,
 17 you tell me if I am unfairly summarising your evidence
 18 yesterday, I think you were saying that Mr Perepilichny
 19 was in effect negotiating with him?
 20 **A. That is how I viewed it.**
 21 Q. Yes. If the learned coroner were to find favour with
 22 that interpretation, so I am dealing with that
 23 hypothesis?
 24 **A. Yes.**
 25 Q. What is wrong with negotiating with someone that might

Page 23

1 pose a threat to you?
 2 **A. Well, if someone is creating a -- is effectively causing**
 3 **a criminal case to be opened and you are paying to have**
 4 **that criminal case closed, that would appear to be**
 5 **bribery.**
 6 Q. Yes, but you have no evidence that any bribery in fact
 7 took place?
 8 **A. We have no evidence that any payment was made.**
 9 Q. Yes, so the answer to my question is you have no such
 10 evidence?
 11 **A. We have no evidence that any payment was made.**
 12 Q. No.
 13 Yesterday I understood you to say that it was
 14 commonplace for Russian businessmen, which must include
 15 decent businessmen as well as the less decent, to have
 16 to negotiate with organised crime because that is the
 17 very culture of Russian business for the 1990s, 2000s
 18 and ongoing. I thought you said that was a commonplace
 19 experience?
 20 **A. The only thing I didn't make a distinction between**
 21 **decent and indecent businessmen. I don't think anyone**
 22 **who gives a bribe or pays for extortion is a decent**
 23 **businessman.**
 24 Q. That is an interesting proposition that might consign
 25 many British businessmen into some difficulties if you

Page 24

<p>1 think about the Middle East.</p> <p>2 A. Well ...</p> <p>3 Q. But you have no evidence that there was any</p> <p>4 consummation, any crystallisation, of what you say was</p> <p>5 a bribery negotiation?</p> <p>6 A. That's correct.</p> <p>7 Q. Taking your theory on its face, if someone was</p> <p>8 negotiating with a criminal, it might be thought that</p> <p>9 would reduce the risk to them, not increase it?</p> <p>10 A. That is true, except for the fact that whatever was</p> <p>11 supposed to have happened apparently didn't happen.</p> <p>12 Q. Well, what did happen, consist with Mr Perepilichny's</p> <p>13 assistance to your organisation, is he did attend</p> <p>14 Lausanne I think in Switzerland and give evidence to the</p> <p>15 Swiss authorities. Didn't he?</p> <p>16 A. Exactly.</p> <p>17 Q. He did so, for the record, on 26 April 2012.</p> <p>18 A. That's correct.</p> <p>19 Q. And he gave, I suggest to you, entirely honest evidence?</p> <p>20 A. Which would come back to those Skype messages to say</p> <p>21 that he defied the people who were negotiating with him.</p> <p>22 Q. Yes, but you cannot have it both ways. He showed in</p> <p>23 that sense his own judgment, he showed integrity,</p> <p>24 contrary to any slurs that may have inferentially</p> <p>25 emerged yesterday, didn't he?</p> <p style="text-align: center;">Page 25</p>	<p>1 Q. He was "playing them along", you understand what that</p> <p>2 means?</p> <p>3 A. Yes.</p> <p>4 Q. Yes, and that is another interpretation, isn't it?</p> <p>5 A. That is a possible interpretation.</p> <p>6 Q. Not only did he give the evidence on 26 April, but he</p> <p>7 gave evidence which necessitated subsequently the</p> <p>8 potential confrontation under Swiss law?</p> <p>9 A. That's correct.</p> <p>10 Q. Whilst we are dealing with Mr Perepilichny's</p> <p>11 integrity -- I ask this because his widow is very</p> <p>12 distressed that you appear sometimes to slur him -- you</p> <p>13 don't actually know when it might have been that he</p> <p>14 would have appreciated that the funds he was investing</p> <p>15 for people like Stepanov were criminal proceeds, do you?</p> <p>16 A. Sorry, could you repeat the question?</p> <p>17 Q. Yes. You don't know and can't tell this coroner when it</p> <p>18 might have been that Mr Perepilichny appreciated that</p> <p>19 the funds or some of the funds that he was investing for</p> <p>20 the likes of Stepanov were ill-gotten gains?</p> <p>21 A. That is incorrect. We knew for sure that he was aware</p> <p>22 they were ill-gotten gains when he came to us in the</p> <p>23 summer of 2010, because that was what he reported to us.</p> <p>24 Q. Of course, and for all you know that could have been</p> <p>25 proximate to when he realised what he had been subject</p> <p style="text-align: center;">Page 27</p>
<p>1 A. I'm sorry, what is the point?</p> <p>2 Q. He showed integrity by doing so?</p> <p>3 A. He gave truthful --</p> <p>4 Q. Why are you unable to graciously concede that this</p> <p>5 valuable whistleblower who gave explosive evidence to</p> <p>6 your organisation, why are you unable to graciously</p> <p>7 concede he showed integrity, he attended Switzerland --</p> <p>8 no doubt at great inconvenience -- gave the evidence</p> <p>9 despite everything that was being said to him on your</p> <p>10 account that is true isn't it?</p> <p>11 THE CORONER: I am not sure that is fair. I think you</p> <p>12 actually may not have had an opportunity to get</p> <p>13 an answer in. I think he is accepting, you say that he</p> <p>14 gave truthful evidence when he did it, notwithstanding</p> <p>15 what you say is the effect of the Skype messages?</p> <p>16 A. That's correct.</p> <p>17 THE CORONER: Which you say by reference to the proceedings</p> <p>18 in Switzerland, one may be able to see how they fit in</p> <p>19 with that. That is all you are saying?</p> <p>20 A. That's correct.</p> <p>21 THE CORONER: Thank you.</p> <p>22 MR BEGGS: Indeed it may be another more impartial review of</p> <p>23 those Skype messages if the attribution is accepted, it</p> <p>24 may be he was playing these characters along?</p> <p>25 A. It may be what?</p> <p style="text-align: center;">Page 26</p>	<p>1 to. Do you see that?</p> <p>2 A. So I don't know what his state of mind was about those</p> <p>3 wire transfers, but the fact that he knew it then and</p> <p>4 the fact that he received those monies would suggest</p> <p>5 that he probably knew it earlier than that.</p> <p>6 Q. Hold on a sec, you have to be careful, haven't you, mere</p> <p>7 receipt of ill-gotten gains does not make you guilty of</p> <p>8 money laundering, otherwise most of the banks in</p> <p>9 United States and England would be in deep trouble. You</p> <p>10 know that?</p> <p>11 A. Correct.</p> <p>12 Q. Yes, so I don't want to spend any time because this is</p> <p>13 I accept tangential but for all you know and for all you</p> <p>14 can say evidentially, his realisation that he may have</p> <p>15 been subject to a money laundering scam might have been</p> <p>16 very close to when he blew the whistle with your</p> <p>17 organisation, for all you know?</p> <p>18 A. For all I know that's correct. However, for all I know</p> <p>19 he could have been actively involved in laundering the</p> <p>20 money for these people because he was the one who was</p> <p>21 pushing the money through his accounts.</p> <p>22 Q. Except, you see, if you don't have confirmation bias and</p> <p>23 if you are an impartial witness you might say to</p> <p>24 yourself:</p> <p>25 "Well actually by showing integrity and blowing the</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 whistle to us, by going to Switzerland and showing 2 integrity perhaps it is the case that upon appreciating 3 the difficulties he had inadvertently got himself into, 4 he was trying to make amends". 5 Do you see that? 6 A. I don't believe that that is the case. 7 Q. No, because you don't want to give any credit, for 8 reasons that are best known to you? 9 A. No. I think there is probably a 95 per cent probability 10 that he knew that these monies were -- 11 Q. You have plucked that figure out of the air? 12 A. No, I think for, you know there is a very small 13 probability that he was totally unaware but you don't 14 take millions of dollars into your account -- why would 15 a third party take money into their account to then put 16 it into -- from the government, into the government 17 official's spouse? 18 Q. Mr Browder, you're -- 19 A. Let me just answer the question. 20 Would you take 10 million from your account and then 21 send it to someone else without knowing where it went? 22 Q. Mr Browder, all I am going to say to you is your 23 evidence on this point is so manifestly bias, 24 overlooking recent history such as HSBC -- 25 A. He is not HSBC, he is an individual.</p> <p style="text-align: center;">Page 29</p>	<p>1 Q. You infer that, don't you? 2 A. Well I mean that would be the obvious inference that 3 a court would come to in a money laundering case. 4 Q. The answer to my question is you agree, you would have 5 to infer that without knowing the full detail? 6 A. Yes, I don't know his state of mind. 7 Q. Going back to my question then, when did you launch your 8 business career in Russia? 9 A. In 1992. 10 Q. Is this a quick history: you made a lot of money to 11 start with, after the wall came down and through 12 perestroika glasnost, is that right? 13 A. I made, lost, made and lost and all sorts of -- 14 Q. Yes, you made a lot of money, you lost a lot of money 15 and then you made a lot of money again? 16 A. Correct. 17 Q. I just want to question whether, as I said earlier your 18 motives are quite as noble as you would always have us 19 believe. 20 When you went to Russia in 1992, it must have been 21 clear to you that this was a nation where the rule of 22 law had never run properly? 23 A. That's correct. 24 Q. Indeed some would say since way before November 1917, 25 you being something of a historian?</p> <p style="text-align: center;">Page 31</p>
<p>1 Q. -- who took multi-million pounds from Mexican cartels. 2 A. That is an absurd comparison. 3 Q. No, no, it is exactly the same comparison. 4 A. No, it is not. 5 Q. It may take a while before people realise what the true 6 source is, but you are not an impartial witness, you are 7 a witness who every twist and turn finds things in 8 favour of your theories to propagate your campaign. 9 That is the reality, isn't it? 10 A. That is not the reality. 11 Q. You knew, didn't you, that he had been acting for 12 Stepanov for many years before he came forward to blow 13 the whistle with you? 14 A. He was a money manager for Stepanov. 15 Q. Yes. Now, you went to Russia in I think was it 1996? 16 Please correct me if I am wrong? 17 A. Actually let me give you a little bit more evidence on 18 the previous question, just thinking about it out loud 19 and right now. Which is that the Stepanovs -- 20 Ms Stepanova was a government official and her husband 21 was a low paid sort of moderately successful 22 businessman, whose tax returns indicated they earned 23 about \$38,000 per year. So any money that he was 24 managing for Stepanov he must have known was the source 25 of illegal funds.</p> <p style="text-align: center;">Page 30</p>	<p>1 A. Yes. 2 Q. You knew that the fall of communism didn't much change 3 that did it, in reality? 4 A. It changed lots of things but it didn't create a rule of 5 law. 6 Q. Yes, so you agree with me? We will get on quicker if 7 you -- 8 A. I do. 9 Q. What I am suggesting is that you can't actually have 10 been that surprised when you were subject to the fraud 11 you have described to this court? 12 A. I was very surprised. 13 Q. What you said on one of your many blogs was: 14 "I now understand how completely naive I was to 15 think that as a foreigner I was somehow immune to the 16 barbarity of the Russian system." 17 That is what you said, you remember those words? 18 A. I do. 19 Q. Is that a concession that you were naive? 20 A. Yes, I said it. 21 Q. Is it really this, that you didn't notice that barbarity 22 whilst you were making vast piles of money, did you? 23 A. I think now you are oversimplifying my state of mind. 24 Q. Fundamentally though I am correct, aren't I? 25 A. No.</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

1 Q. You were prepared to turn a blind eye to all that was
 2 going on whilst you were making yourself
 3 a multi-millionaire, or is it billionaire?
 4 **A. That is not correct.**
 5 MS HILL: Sorry, I didn't hear the answer there.
 6 **A. I said it is not correct.**
 7 MR BEGGS: It is a matter of record, so the coroner has the
 8 full extent of your background that he may or may not
 9 place weight on, that you publicly defended Putin on
 10 a number of occasions, didn't you?
 11 **A. Until I understood what he was up to, yes.**
 12 Q. Yes, and for example you publicly defended him when he
 13 unlawfully imprisoned the richest oligarch. Mr Skelton
 14 dealt with that with you, do you recall?
 15 **A. I do indeed.**
 16 Q. This caused one news outlet from the United States to
 17 say this:
 18 "As Putin grew more authoritarian and a Western view
 19 of him dimmed, Browder continued to praise and defend
 20 him."
 21 MR SKELTON: Sir, sorry to intervene. I wonder if we are
 22 straying too far.
 23 THE CORONER: I think we are. Understandably, you just have
 24 to be a bit careful Mr Beggs because in the same way
 25 that when just every so often Mr Moxon Browne puts

Page 33

1 a comment in a question, you quite properly say let's
 2 just have the question and not the comment.
 3 MR BEGGS: I have not put the question, because Mr Skelton
 4 intervened.
 5 THE CORONER: I am really just reviewing this morning. So
 6 just and also I mean the newspaper point which you have
 7 made perfectly properly yourself, one just needs to be
 8 a bit careful about it.
 9 MR BEGGS: I quite agree that the point --
 10 THE CORONER: You have put your point straight to him
 11 without really the benefit of needing to what is in the
 12 newspaper and we have his answer.
 13 MR BEGGS: Is this, let me surmise it then so I do not have
 14 to take you through your numerous public statements.
 15 You did vigorously defend Putin for some time, didn't
 16 you?
 17 **A. "Vigorous" may be too strong a word, but I was**
 18 **a supporter of Vladimir Putin until I realised he was**
 19 **not the reformer I thought he was and that he was**
 20 **actually not going after the oligarchs but trying to**
 21 **become the biggest oligarch himself.**
 22 Q. Just taking the learned coroner's point on board and
 23 moving on, you were supporting him up to a few months
 24 before he had you arrested and expelled?
 25 **A. I supported him pretty much up till that point.**

Page 34

1 Q. Yes.
 2 **A. Having said that, my support started to dim about a year**
 3 **before that when he, after taking Khodorkovsky's oil**
 4 **company, expropriating it effectively for free, he then**
 5 **gave Roman Abramovich \$13 billion for his oil company,**
 6 **and I thought that looked kind of strange and that was**
 7 **the first inkling I got that Putin was not the reforming**
 8 **nationalist that he had presented himself to me and to**
 9 **others to be.**
 10 Q. That, Mr Browder, is the narrative that you would now
 11 wish this court and the media to propagate, isn't it?
 12 **A. No, that the truth.**
 13 Q. You see, is the truth not a little cruder, that whilst
 14 you were making money you were prepared to tolerate the
 15 barbarity you describe and it is only when you were
 16 taken out that you had this damascene conversion to
 17 human rights?
 18 **A. No, that is completely inaccurate. When I was in**
 19 **Russia --**
 20 Q. Is it inaccurate --
 21 THE CORONER: Do let him finish.
 22 MR BEGGS: Yes.
 23 **A. It is inaccurate. When I was in Russia I spent a good**
 24 **part of the time that I was there exposing the barbarity**
 25 **of the system, we exposed billions of dollars of fraud**

Page 35

1 **at Gazprom, got hundreds and hundreds of articles**
 2 **written about the fraud at Gazprom which led to and**
 3 **caused the CEO of Gazprom to be fired. We exposed**
 4 **massive asset stripping plans at Unified Energy Systems,**
 5 **the national electricity monopoly, which caused the**
 6 **government to change the restructuring plan of Unified**
 7 **Energy Systems.**
 8 **We exposed the fraudulent share issue at Sberbank,**
 9 **the national savings bank, which caused the government**
 10 **to change the law on new share issues.**
 11 **I spent the entire time I was in Russia trying to**
 12 **challenge the barbarity of the system, not accept it.**
 13 Q. All of those challenges had a useful commercial product,
 14 didn't they?
 15 **A. And they also had a useful public good.**
 16 Q. You agree with my question, they had a useful product
 17 for you. You so described it yesterday?
 18 **A. And what I said is it was both for commercial and moral**
 19 **reasons that I enjoyed doing what I did.**
 20 Q. And your autobiography goes by two titles, I think, is
 21 that right? It goes by the title "A True Story of High
 22 Finance, Murder and One Man's Fight for Justice". That
 23 is the non-UK title, correct?
 24 **A. Yes, that is the American title.**
 25 Q. The UK title is, "How I Became Putin's Number 1 Enemy"?

Page 36

1 **A. That's correct.**
 2 Q. Yes.
 3 You have, since writing that book and many years
 4 before, assiduously as you said yesterday courted the
 5 media, haven't you?
 6 **A. In Russia, and in the West, sometimes the fourth estate**
 7 **is the only way that you can change things and as**
 8 **an activist I use all the tools that being an activist**
 9 **can use either as a shareholder rights activist or as**
 10 **a human rights activist, which includes using the**
 11 **courts, going to the regulators and going to the press.**
 12 Q. Human rights and the support of that cause, to which we
 13 all subscribe, also requires restraint, discretion and
 14 accuracy, doesn't it?
 15 **A. I think all aspects of life require that, I would**
 16 **imagine.**
 17 Q. It would be wrong, wouldn't it, to use a particular
 18 unexplained as you perceive it death to propagate your
 19 own campaign and your own publicity machine, wouldn't
 20 it?
 21 **A. Of course.**
 22 Q. Can I take it quickly then that, since the death of
 23 Mr Perepilichnyy, it would be fair to say, wouldn't it
 24 that you have issued scores, if not hundreds, of tweets,
 25 blogs, media interviews and so forth?

Page 37

1 **A. Sir, if you look at my Twitter account there are**
 2 **probably 10,000 tweets, maybe 8,000 I have not counted**
 3 **and they involve all the things that I am involved in,**
 4 **and so I haven't counted the number of tweets, we could**
 5 **certainly go back and do that, I don't want to confirm**
 6 **the number of tweets --**
 7 Q. I was more restrained, I said scores and you are
 8 confirming that you have issued thousands of tweets --
 9 **A. Not about this case.**
 10 THE CORONER: I just want you to finish the answer you are
 11 in the middle of.
 12 **A. I have, I can check right now, but let's say 8,000**
 13 **tweets on all aspects of my campaign for justice and**
 14 **this campaign, or this case, to get to the truth of this**
 15 **case as part of my campaign for justice, so certainly**
 16 **I wouldn't have excluded newspaper articles about this**
 17 **case on my Twitter feed.**
 18 MR BEGGS: Certainly not. Because on 20 May 2015, you posed
 19 the question, "Was Russian tycoon assassinated with rare
 20 poison?"
 21 10 May 2016 you posed the question, "Shocking
 22 development in Perepilichnyy case, Chechen hitman who
 23 had his details arrested in Turkey".
 24 7 September 2016, more on Perepilichnyy, "Inquest
 25 into Russian mob whistleblower's possible murder delayed

Page 38

1 by national security".
 2 What I am suggesting to you is that whilst you made
 3 great play yesterday of the rule of law, much of your
 4 campaign has been a rule of media, hasn't it?
 5 **A. Well, if you actually looked at my campaign objectively,**
 6 **you would see that we have been involved in many**
 7 **different legal proceedings, many different government**
 8 **testimonies, many different parliamentary testimonies**
 9 **and many different press interactions. You are focusing**
 10 **on one aspect of my activism and focusing very narrowly**
 11 **on several tweets, but --**
 12 Q. Well, let me say why I am --
 13 THE CORONER: Do let him finish.
 14 **A. So if you look at the entirety of it, I am basically**
 15 **documenting what I do, where I do it and how I do it and**
 16 **everything I do. And if you were to look at all my**
 17 **activities, you would find no deletion of activities for**
 18 **one area that I am involved in, so if you are referring**
 19 **to tweets about this case, it is just as public and**
 20 **transparent as the tweets about every other case I am**
 21 **involved in, unless there is a restriction on tweeting**
 22 **or disclosing it because of a court decision.**
 23 MR BEGGS: Mr Browder, are you telling this coroner that it
 24 never occurred to you when in the build up to this
 25 Inquest, that your media products might not influence

Page 39

1 witnesses, that never occurred to you?
 2 **A. Well, so the -- at the very beginning this process,**
 3 **there was a horrible lack of response by the police when**
 4 **we informed them that, when we learned -- so**
 5 **Mr Perepilichnyy, as I understand, died on 10 November**
 6 **and we only learned about it on 16 November. And when**
 7 **we learned about it, we got in touch with the police on**
 8 **17 November with a letter from our law firm,**
 9 **Brown Rudnick who you have been referring to, alerting**
 10 **them to the fact that he was a whistleblower who had**
 11 **been cooperating with authorities and exposing Russian**
 12 **organised crime. And we asked them to investigate his**
 13 **death as a potential murder and asked them to as quickly**
 14 **as possible secure the evidence and look for toxicology**
 15 **tests, based on the murder by poison of**
 16 **Alexander Litvinenko.**
 17 **The police didn't respond, our lawyers called -- it**
 18 **was a Saturday that we sent the letter, our lawyers**
 19 **called on Monday, they called on Tuesday, they called on**
 20 **Wednesday and the police refused to give us any response**
 21 **as to acknowledging whether the facts of our letter were**
 22 **in their possession --**
 23 MR BEGGS: Sorry, can I interrupt?
 24 THE CORONER: You can, but --
 25 MR BEGGS: I was hoping you might answer the question rather

Page 40

1 than give another monologue.
 2 THE CORONER: As you know, I am not interrupting you either,
 3 I've got the thread of what you are saying but --
 4 **A. I was going to get to it.**
 5 THE CORONER: Then you do that.
 6 **A. It became clear to us that there was some type of**
 7 **blockade, either intentional or based on negligence of**
 8 **the police, and the only way that we could get a proper**
 9 **investigation into what happened to**
 10 **Alexander Perepilichny was to go to the press, and so**
 11 **we went to the press and the -- we used the press very**
 12 **specifically to break through the blockade that was**
 13 **being put in front of us by the police. And on**
 14 **28 November, the Independent ran an article called**
 15 **"Supergrass killed in Surrey", or something to that**
 16 **effect, and that is what precipitated the proper**
 17 **investigation of his death.**
 18 Q. Can I pause you there, so were you responsible for the
 19 28 November 2012 Independent article?
 20 **A. I was.**
 21 Q. Remind us of the headline of that article?
 22 **A. I was not the one that made a headline, I can't**
 23 **remember, but it was something about supergrass in**
 24 **Surrey, killed in Surrey, supergrass dies in Surrey.**
 25 Q. Yes.

Page 41

1 Just go back to my question, that has it ever
 2 occurred to you by planting -- I don't mean that
 3 pejoratively, by "planting" is a better word, these
 4 stories, these tweets, blogs and so forth, has it ever
 5 occurred to you that it might influence witnesses?
 6 **A. Well at the time there were no witnesses, this was**
 7 **a time when there was no police investigation, so how**
 8 **could there have been any witnesses?**
 9 Q. Come on, you can do better -- there are always going to
 10 be witnesses.
 11 **A. It is an absurd question, so the --**
 12 Q. Is it absurd?
 13 THE CORONER: Just let him finish, you have asked it.
 14 **A. So the answer is the police were refusing to investigate**
 15 **and so we needed -- if we think the guy has been killed,**
 16 **and the police refuse to investigate, of course we are**
 17 **trying to influence the police to open an investigation.**
 18 Q. Are you also trying to influence witnesses?
 19 **A. No, I am not trying to influence witnesses. I was**
 20 **trying to influence the police to do their job.**
 21 Q. You see once the police started the thorough
 22 investigation under DCI Pollard on or about 29 November,
 23 and you knew they were doing that because they came and
 24 met your officials a few days later and took a file away
 25 from your organisation. Why didn't you at that stage

Page 42

1 stop placing articles about poisoning, about the Secret
 2 Service, about hit men and all the other florid
 3 theories?
 4 **A. You seem to give me much greater credit than I am due.**
 5 **I don't place articles, this became a matter of extreme**
 6 **public interest, a potential murder of a Russian**
 7 **dissident in the suburbs of London was something I had**
 8 **no control over the public interest that then took over**
 9 **this case.**
 10 Q. Mr Browder, that is with respect a little disingenuous
 11 because I was hoping to spare the learned coroner taking
 12 you through your many tweets with sensationalist
 13 headlines, all of which significantly postdate the
 14 conclusion of the police investigation, let alone its
 15 commencement.
 16 I will ask you one more time, did you ever consider
 17 the impact it might have on witnesses trying to give
 18 impartial evidence in this case?
 19 **A. I don't believe that my actions influenced any**
 20 **witnesses.**
 21 Q. Well, we have heard one such witness effectively
 22 conceding that her views were influenced by what she
 23 read in the media.
 24 **A. What are you referring to?**
 25 Q. I am referring to Liz Kaye.

Page 43

1 **A. I don't know that --**
 2 Q. You see what I am suggesting is that you utilise the
 3 rule of law with your vast wealth when it suits you but
 4 you also indiscriminately and irresponsibly place
 5 articles which you know to be sensationalist and you
 6 have been doing that consistently since late
 7 November 2012.
 8 **A. I disagree.**
 9 Q. Have you ever given any thought to how your campaign may
 10 have collaterally damaged the widow and her two
 11 children, have you ever thought about that?
 12 **A. Of course.**
 13 Q. Would you please be handed by Mr Suter a letter dated
 14 20 November 2012. You have it, thank you.
 15 May I just check with the learned coroner?
 16 THE CORONER: I did have it. I saw it when it came in and I
 17 have it, yes.
 18 MR BEGGS: Have you had the opportunity, Mr Browder, to
 19 review that clip of correspondence?
 20 **A. I have.**
 21 Q. May I take it, I don't want to be unfair to you but may
 22 I take it you have had a chance to read all three pages?
 23 **A. I have not read them carefully, but I remember this**
 24 **letter from the time it was sent.**
 25 Q. We see it is a letter from Swiss lawyers, effectively

Page 44

1 passing on a letter to you dated 18 December 2012?
 2 **A. Yes, it is an unsigned letter from the friends and**
 3 **relatives of Alexander Perepilichny.**
 4 Q. Yes, you are right, it says "Yours sincerely, friends
 5 and relatives of Alexander", and just so you understand,
 6 it is not a letter that was written by or at the
 7 procurement of my client but it is a letter that you
 8 received presumably a few days later, or perhaps the
 9 very day?
 10 **A. We received it on 20 December.**
 11 Q. How do you remember that? Because of the first --
 12 **A. It is on the front page.**
 13 Q. Yes.
 14 The learned coroner has read it, so I can take it
 15 quickly.
 16 THE CORONER: If you would, because the question arises as
 17 to quite how much help it is going to give me.
 18 I understand the sentiments in it and I have read it.
 19 MR BEGGS: Let me cut to the chase.
 20 THE CORONER: Do that. One question, let's see if you can
 21 do it in one.
 22 MR BEGGS: In effect, I hope I summarise accurately, it was
 23 seeking some perhaps restraint on your part in the
 24 manner of your ongoing PR campaign, wasn't it?
 25 **A. I think -- so basically, days after Mr Perepilichny**

Page 45

1 **died, or actually days after we became aware -- or days**
 2 **after the first Independent article came out, we got**
 3 **a very threatening message from Mrs Perepilichnaya to**
 4 **one of my colleagues saying that you and your kids will**
 5 **die in hell for the things you are saying about my**
 6 **husband.**
 7 **And then there was a following letter or following**
 8 **email and this was also submitted to the police in the**
 9 **file, saying, "If you continue to disclose information,**
 10 **I am going to disclose things about you and bad things**
 11 **are going to happen".**
 12 Q. Well I have no doubt that my client may have been very
 13 upset because of the media that you were creating
 14 about --
 15 **A. I didn't create -- the only thing I created was the**
 16 **media because the police refused to investigate.**
 17 Q. You created the media?
 18 **A. I was the one that gave it to the Independent, which**
 19 **created the first article which then -- once the news**
 20 **was out of his death, it took on a life of its own.**
 21 Q. Well I don't accept that for one moment because you
 22 repetitively placed further articles as your Twitter
 23 account shows, but let me cut to the chase --
 24 **A. No, you are mischaracterising my Twitter account. My**
 25 **Twitter account is posting articles that were written on**

Page 46

1 **the back of events that took place here in the coroner's**
 2 **court.**
 3 Q. Well the circularity I will leave --
 4 **A. No, no, no, you cannot say to the coroner for his**
 5 **evidence that I placed information on Twitter exposing**
 6 **things --**
 7 Q. That is what I am suggesting, so you understand,
 8 Mr Browder. You have run a sophisticated?
 9 **A. Let's examine it --**
 10 Q. You have run a sophisticated media campaign which you
 11 are not fully revealing to this coroner. Did you
 12 telephone journalists yesterday to tell them to be at
 13 court to listen to your evidence?
 14 **A. No, I did not.**
 15 Q. Really?
 16 **A. I did not.**
 17 Q. All right, well we will think about that. You see you
 18 style yourself frequently as a human rights campaigner?
 19 **A. And I am.**
 20 Q. You are?
 21 **A. I am.**
 22 Q. Did you extend your condolences at any stage to your
 23 widow?
 24 **A. My colleagues did I know --**
 25 Q. Did you extend your condolences at any stage?

Page 47

1 **A. I never had contact with the widow nor did I have**
 2 **contact with Alexander --**
 3 Q. You have expensive lawyers who could write a simple
 4 letter.
 5 **A. Well and I also have colleagues who actually went to --**
 6 **the moments after he died and extended their**
 7 **condolences.**
 8 Q. I suggest the reality is not, in this instance anyway,
 9 that of a human rights campaigner but that of
 10 a politically motivated self interested campaigner who
 11 has used Alexander Perepilichny as a pawn in your wider
 12 game, haven't you?
 13 **A. No, I have not.**
 14 Q. You have sacrificed not just his reputation but that of
 15 his wife and that of his two children, who have to
 16 suffer the indignities of your florid conspiracy
 17 theories which have no basis in evidence?
 18 THE CORONER: There might just have been a question
 19 somewhere in there --
 20 MR BEGGS: There was a question, he can disagree if he
 21 wishes.
 22 THE CORONER: Well, I know, but there was an awful lot of
 23 other material there.
 24 You don't accept that and you have explained why you
 25 say you have done some of the things that you have done,

Page 48

1 you have been explaining that. All right.
 2 Yes, Ms Hill.
 3 MS HILL: Thank you sir.
 4 Questions from MS HILL
 5 MS HILL: Mr Browder, I would like to ask you first of all
 6 to deal with a few matters that learned counsel for the
 7 coroner didn't adduce from your witness evidence. Can
 8 I ask you please to focus your mind first of all on the
 9 issue of the threats that Hermitage and members of its
 10 staff have received. Yes.
 11 You are giving evidence are you not on behalf of
 12 Hermitage because other people are unwilling to give
 13 evidence publicly; is that right?
 14 **A. That's correct.**
 15 Q. And so when other people have told you about threats
 16 they have received, it is incumbent on you if you can to
 17 assist the coroner with that. Is that right?
 18 **A. That's correct.**
 19 Q. If I just read you some examples of threats that other
 20 members of your team have reported, can you confirm that
 21 you understand these to be correct.
 22 Sir if you wish to turn this up, sir, I am just
 23 reading out part of Mr A's statement is at page 873 of
 24 volume 4 but I will just read it out for you.
 25 THE CORONER: Yes, page 873.

Page 49

1 MS HILL: Yes.
 2 Mr Browder let me just read this out to you if I may
 3 or if you would like to look at it it is bundle 4,
 4 I think it is volume 3 and it is page 873.
 5 **A. Why don't you read it out whilst I am finding the**
 6 **bundle?**
 7 **Bundle 4, volume 3?**
 8 Q. I think it is bundle 4, volume 3. You may have it there
 9 in front of you, it is page 873, please. It is part of
 10 Mr A's statement, signed 11 November 2015 and it is
 11 internal page 14. Do you have that?
 12 **A. Yes.**
 13 Q. What that statement says is to describe in summary form,
 14 just going back in fact to page 872, an incident that
 15 I don't think learned counsel for the coroner adduced
 16 from you that you will be familiar with, there was
 17 an incident was there not in August 2008 when
 18 a suspicious package arrived at Hermitage offices that
 19 effectively was seen as some kind of a threat. Is that
 20 right?
 21 **A. This was a package that was sent to one of our lawyers**
 22 **in Moscow.**
 23 Q. Yes?
 24 **A. By DHL putting a fake return address of our offices in**
 25 **London, so Russian gangsters from the Klyuev crime group**

Page 50

1 **came from Russia to London to Lambeth, DHL, with**
 2 **a package of documents, sent back to Moscow, arrived at**
 3 **our lawyer's office in Moscow, and then half an hour**
 4 **later the police, Moscow police arrived to search his**
 5 **office looking for the package and inside the package**
 6 **were documents from the fraud.**
 7 Q. Thank you.
 8 Over the page, please, is this also right that
 9 Hermitage and its lawyers have also received threats
 10 directly, such as the one described at paragraph 69,
 11 that one of the external lawyers engaged by Hermitage
 12 received a threat, October 2009, along the lines of,
 13 "What is more terrifying, I don't know, death or jail?"
 14 Do you see that?
 15 **A. I do, yes.**
 16 Q. There was a further message sent the following day
 17 suggesting he will come to darkness of Solikamsk Prison,
 18 is that right, the notorious Russian prison?
 19 **A. Correct.**
 20 Q. And there was a further text a few days later, "If
 21 history has taught us anything, it is that you can kill
 22 anyone", this is a quote from the film The Godfather, is
 23 that right?
 24 **A. That's correct.**
 25 Q. Two days after Mr Magnitsky was murdered, a further

Page 51

1 text:
 2 "There is a lawyer who died in prison under one very
 3 interesting criminal case, the turning point the paid up
 4 articles will not work, extraditions, et cetera."
 5 Do you see all that?
 6 **A. Yes.**
 7 Q. Those are typical are they of the sort of threats that
 8 you and your colleagues have received?
 9 **A. That's correct.**
 10 Q. Is this right that when those sort of threats have been
 11 made to you and your staff, you have been assiduous at
 12 trying to protect your employees?
 13 **A. That's correct.**
 14 Q. And members of your own family and your immediate
 15 circle?
 16 **A. And their families as well.**
 17 Q. I would just like to ask you some further questions
 18 please about part of your second witness statement.
 19 Could you look please at the second witness statement
 20 you provided.
 21 **A. Yes.**
 22 Q. In particular a section that I don't think was adduced
 23 by learned coroner's counsel, it begins at paragraph 30,
 24 internal page 5.
 25 **A. Yes.**

Page 52

<p>1 Q. Is this right, by way of summary -- the learned coroner 2 can of course read it -- that you provided this second 3 statement partly to provide material to the court that 4 has arisen since the evidence and the findings of the 5 Litvinenko Inquiry, is that right?</p> <p>6 A. That's correct.</p> <p>7 Q. One aspect of the evidence that you sought to draw to 8 the learned coroner's attention was, as is said at 9 paragraph 31, the evidence adduced at the Litvinenko 10 Inquiry about the ability of the Russian security 11 services to design poisons.</p> <p>12 A. Yes.</p> <p>13 Q. You have set out in detail for the coroner the evidence 14 adduced before Sir Robert Owen about the factory, that 15 is said to exist in Russia, where experimental poisons 16 are designed. Is that right?</p> <p>17 A. That's correct.</p> <p>18 Q. You have also referred, I am sure the learned coroner 19 can read it, to various press reports about it, Panorama 20 reports about it and extracts from a book about it. 21 That in fact offer the proposition that a core function 22 of this laboratory was experimenting with poisons. Is 23 that right?</p> <p>24 A. That's right.</p> <p>25 Q. That it is understood that some of these poisons are, as</p> <p style="text-align: center;">Page 53</p>	<p>1 Q. In your evidence, generally, Mr Browder, you have given 2 the learned coroner quite a few examples of similar 3 either serious injuries or deaths where, is this right, 4 you suggest to the coroner that quite often these have 5 occurred when people are giving evidence or might give 6 evidence. Is that right?</p> <p>7 A. Giving evidence, might give evidence or, in the case of 8 certain individuals, where they are members of the 9 criminal group, that they want to place the blame on 10 them.</p> <p>11 Q. Just finally in your second statement the learned 12 coroner can read I am sure the information you provided 13 about Mr Kara-Murza that begins at paragraph 4, but 14 putting it very briefly, is this right, that 15 Mr Kara-Murza is a Russian political activist who has 16 been poisoned on two occasions?</p> <p>17 A. That's correct.</p> <p>18 Q. The poison has yet to be identified but the medics 19 treating him are confident he has in fact been poisoned?</p> <p>20 A. That is correct.</p> <p>21 Q. And that when he has spoken about this, the learned 22 coroner can read these extracts, going over the page, 23 please, to paragraph 13 of your witness statement, you 24 have quoted Mr Kara-Murza in the press saying that he 25 anticipates that the poison that was used to poison him</p> <p style="text-align: center;">Page 55</p>
<p>1 you say at paragraph 33, specialised poisons that 2 produce untraceable toxins that cause apparently natural 3 deaths. Is that right?</p> <p>4 A. That is right.</p> <p>5 Q. Just before we leave your second statement, the learned 6 coroner I am sure has the point that you gave some 7 evidence about Mr Gorokhov, is that right?</p> <p>8 A. That's correct.</p> <p>9 Q. Who was again a Russian lawyer for the family of 10 Mr Magnitsky. Who, is this right, when he had the 11 incident when he fell from the apartment was in that 12 capacity somebody who was going to give evidence?</p> <p>13 A. Yes, so the following day he was going to show up in 14 court to give evidence about leaked emails from 15 Andrei Pavlov to members of the Russian law enforcement 16 agencies discussing how to cover up the liability of the 17 Klyuev organised crime group in the case of 18 Sergei Magnitsky.</p> <p>19 These leaked emails, we had become -- we had come 20 into possession of and the emails were going to be 21 submitted to court in order to try to reopen the case on 22 the murder of Sergei Magnitsky. And the night before he 23 was going to show up in court to present this evidence, 24 he fell four storeys from his apartment in a -- 25 thankfully he didn't die and he survived the fall.</p> <p style="text-align: center;">Page 54</p>	<p>1 on the second occasion, and perhaps indeed also on the 2 first, was a highly sophisticated toxin that was not 3 easily traceable:</p> <p>4 "I think it must be people who either have been or 5 were connected to the Russian special services, there is 6 no doubt about that."</p> <p>7 That is what he has said?</p> <p>8 A. That is what he has said.</p> <p>9 Q. He has also said, explaining what happened to him, that 10 he didn't notice anything about the way in which the 11 poison was administered to him on that second occasion?</p> <p>12 A. On both occasions.</p> <p>13 Q. On both occasions.</p> <p>14 For completeness, he had also indicated that it was 15 about six hours for his body to begin to shut down. Is 16 that right?</p> <p>17 A. That's correct. Can I point out one more thing about 18 Kara-Murza, which he was an active participant and 19 collaborator with us in getting Magnitsky sanctions 20 passed in Canada, the United States and the 21 European Union and has been publicly doing that and the 22 second poisoning happened shortly after he was 23 successful in getting Alexander Bastykin, who is the 24 most senior law enforcement officer in Russia, placed on 25 the US sanctions list.</p> <p style="text-align: center;">Page 56</p>

1 Q. Thank you.
 2 You were asked some questions, Mr Browder, about the
 3 provenance of the Skype addresses, just putting your
 4 statement to one side for now, you were asked some
 5 questions by Mr Beggs about the addresses on the Skype
 6 messages and how it is understood or believed that some
 7 people are attributed to those particular addresses. Is
 8 that right?
 9 **A. That's right.**
 10 Q. You were asked in particular about why it is believed
 11 that the News Rus.com address is Mr Pavlov.
 12 **A. That's right.**
 13 Q. You gave some evidence about that, it is not a memory
 14 test at all and the learned coroner I am sure has been
 15 given a copy of this letter by his counsel but your
 16 legal team wrote a letter on 1 June 2016 setting out the
 17 evidential basis that they had used to work out that
 18 Mr Pavlov was that address. Are you familiar with that
 19 letter now or not?
 20 **A. I don't recall, but --**
 21 Q. I see.
 22 That was a letter that was circulated, sir, to all
 23 the interested persons. I provided a further copy to
 24 your legal team yesterday and in short form that
 25 provides a link between the mobile numbers used in the

Page 57

1 Skype messages and visa documentation that helps tally
 2 the two together and that is the basis on which it is
 3 believed that that address is Mr Pavlov, who is of
 4 course referred to as "Andrei" at the beginning of the
 5 exchange. Is that right?
 6 **A. Yes.**
 7 Q. We can assist further on that if need be, sir.
 8 You were asked some questions by Mr Beggs,
 9 Mr Browder, about your understanding of why
 10 Mr Perepilichny left Russia.
 11 **A. Yes.**
 12 Q. Is this right, that -- I suspect I have the British
 13 version of your book -- you made clear in your book that
 14 your understanding was, and I just read this out:
 15 "He told us the reason he had had so many of these
 16 documents was that he had been a private banker for
 17 a number of wealthy Russians ... this had gone well
 18 until the markets crashed. According to Perepilichny,
 19 instead of accepting these losses the Stepanovs accused
 20 him of stealing the money, demanded he repay them.
 21 Since Perepilichny had no intention of covering their
 22 market losses Olga Stepanova used her position as head
 23 of the tax office to get a criminal tax evasion case
 24 opened against Perepilichny. Perepilichny promptly
 25 fled Russia to avoid arrest."

Page 58

1 **A. That's correct.**
 2 Q. So whatever he may or may not have said to his wife,
 3 that is what you understood was the reason why he was
 4 leaving Russia?
 5 **A. And that what he said to my colleagues, which is how**
 6 **I was able to write about it.**
 7 Q. For completeness I don't quite know if Mr Beggs was
 8 seeking to suggest this was not in your witness
 9 statement but you have given evidence in your witness
 10 statement before the court about that issue?
 11 **A. I have.**
 12 Q. You were asked some questions by my learned friend
 13 Ms Barton about the issue of the Paris hotels and
 14 whether or not Mr Perepilichny had booked into more
 15 than one hotel?
 16 **A. That's correct.**
 17 Q. You were asked to try and remember where the evidence is
 18 about that or where you have got that idea from.
 19 **A. Yes.**
 20 Q. All right.
 21 Is this right, as a matter of record, that the
 22 learned coroner, as far as you understand it, does not
 23 have before him a copy of a detailed analysis from the
 24 French police or the French authorities of where
 25 Mr Perepilichny went, who he was with, where he stayed,

Page 59

1 where he ate, where he shopped and who he associated
 2 with during that trip to Paris?
 3 **A. What was the beginning?**
 4 Q. The learned coroner does not have for example a French
 5 police file in front of him?
 6 **A. No, he doesn't and there is a French police file that we**
 7 **caused them to open and investigate.**
 8 Q. Indeed, for completeness, I think you asked the previous
 9 coroner to obtain French police materials, the coroner
 10 did not do so, so this coroner does not have witness
 11 statements from members of French hotel staff, witness
 12 statements from people in shops and things of that
 13 nature. We are trying to piece together, are we not,
 14 Mr Perepilichny's movements from things like credit
 15 cards, mobile phones and things like that?
 16 **A. That's correct.**
 17 MS HILL: Sir, I don't know if you wish to turn it up, in
 18 certainly one place, bundle 5, page 257 I will just read
 19 this out for completeness. We are looking here at one
 20 piece of evidence about this, it is a credit card
 21 printout.
 22 Sir, I don't know if you want to turn it up or not?
 23 THE CORONER: Just tell me what it says, I have made a note.
 24 MS HILL: It is bundle 5, 257, it is in other places but
 25 just very briefly what that shows at the foot of the

Page 60

<p>1 page are a range of different entries, perhaps one can 2 help in this way. At 6.15 in the morning on 8 November 3 the card is used and the cardholder is present at 4 Hounslow WH Smiths, it may or may not be Heathrow, and 5 then there are no entries until 11.33, 1.43 in the 6 afternoon, 5.22 in the afternoon and 9.56 in the 7 evening.</p> <p>8 Of those four entries, there is an entry for the 9 Hotel Bristol for £115, an entry for the Four Seasons 10 £81, an entry for the Hotel Crillon at £164. Obviously 11 one doesn't know exactly whether they were meals or 12 accommodation or what, but does that suggest to you 13 something about potentially different hotels in Paris?</p> <p>14 A. That does, yes.</p> <p>15 Q. Can I ask you some questions please --</p> <p>16 THE CORONER: What is the biggest of those figures, I have 17 the Bristol at 115.</p> <p>18 MS HILL: The Hotel Crillon, excuse my French.</p> <p>19 THE CORONER: That is all right.</p> <p>20 MS HILL: 164.78.</p> <p>21 THE CORONER: I think you might be doing well to get 22 accommodation there at those --</p> <p>23 MS HILL: I think the understanding is that he did actually 24 stay at the Bristol, which is the cheaper one, not as 25 cheap as the Four Seasons which for £81 may just be</p> <p style="text-align: center;">Page 61</p>	<p>1 THE CORONER: Yes.</p> <p>2 MS HILL: Moving on if I may, please. You were asked a lot 3 of questions, Mr Browder, about the various meetings 4 that your staff held with Mr Perepilichny --</p> <p>5 A. Yes.</p> <p>6 Q. -- which you were not present at but which you are 7 giving evidence about to the best of your understanding?</p> <p>8 A. Yes.</p> <p>9 Q. You were asked a lot of questions about why no 10 attendance notes or things of that nature were taken at 11 those meetings?</p> <p>12 A. That's right.</p> <p>13 Q. Is this correct, that your lawyer or a lawyer, 14 Mr Firestone, was only present at the first of those 15 meetings?</p> <p>16 A. That's correct.</p> <p>17 Q. The remainder of those meetings were not legal meetings 18 with solicitors present?</p> <p>19 A. That's correct.</p> <p>20 Q. And that these meetings were part of your business 21 dealings or your campaign dealings, they were not being 22 done with a view to any legal claim or you were not 23 taking legal advice about them throughout that process. 24 Is that right?</p> <p>25 A. That's correct.</p> <p style="text-align: center;">Page 63</p>
<p>1 a sandwich, I don't know.</p> <p>2 Can I ask you some questions please about the line 3 of questioning --</p> <p>4 THE CORONER: All right, but I think the point was that if 5 that is it, that that might be a scant basis for 6 saying -- is that what it comes to for saying he is 7 booked into two hotels?</p> <p>8 MS HILL: There is further evidence I think from the 9 Hotel Bristol, I don't think there is any positive 10 evidence to say he could not for example have booked 11 into another hotel in a different name.</p> <p>12 THE CORONER: All right. I didn't get the impression -- 13 I haven't got it -- that that was exactly how the 14 newspaper article put it or --</p> <p>15 MS HILL: Certainly, sir, when he booked into the Bristol he 16 used a different address not a fake address, sorry 17 a previous address. He had at least two if not three 18 passports so.</p> <p>19 MS BARTON: Sir, this is either evidence or a submission.</p> <p>20 THE CORONER: All right, anyway --</p> <p>21 MS BARTON: The point I made has now been well made it seems 22 to me.</p> <p>23 THE CORONER: Let's leave it at that, all right.</p> <p>24 MS HILL: Sir, I was trying to be as fair as possible to my 25 client whilst he is in the witness box.</p> <p style="text-align: center;">Page 62</p>	<p>1 Q. Is it your normal practice when attending business 2 meetings and things of that nature to take an attendance 3 note as a lawyer might do?</p> <p>4 A. No, we don't ever do that.</p> <p>5 Q. Do you think in the professional business or industry in 6 which you operate that people in a similar position to 7 you would take an attendance note of every meeting they 8 do go to?</p> <p>9 A. It would be impossible. I spend my whole life -- I have 10 10 to 15 meetings a day, I do not have time to take 11 attendance notes.</p> <p>12 Q. You were asked a lot of questions about the nature of 13 the material that Mr Perepilichny provided you with and 14 I don't know if part of the suggestion was that you 15 should have taken a note to understand what material he 16 was giving your staff, all right, that is what I would 17 like to ask you about.</p> <p>18 Is this a fair summary, that he provided you with 19 documentation?</p> <p>20 A. Yes.</p> <p>21 Q. And your staff spent some time trying to verify whether 22 those bank statements and things of that nature tallied 23 with what he was telling you?</p> <p>24 A. That's correct.</p> <p>25 Q. Sir, I don't know if you wanted to have another look at</p> <p style="text-align: center;">Page 64</p>

<p>1 it, at another point, but is this right, Mr Browder, 2 that the Swiss complaint that you eventually lodged was 3 a very lengthy document that set out and appended to it 4 all of the documentation that Mr Perepilichny had 5 provided and what your staff had used to verify it? 6 A. Yes, so it was -- the documents he gave us are 7 a contemporaneous verification and our analysis of all 8 of that to what laws were broken in Switzerland, which 9 would allow them to open a criminal case. 10 Q. Sir, it may just be prudent to turn it up very briefly 11 if I may. It is bundle 1, page 249, just to see the 12 scale of it, sir. 13 Bundle 1, page 249. 14 A. Bundle 1 background? 15 Q. Bundle 1, page 249? 16 A. There are two bundle 1s, is it the background -- 17 Q. It is bundle 1, background bundle 1. Page 249, behind 18 tab 10. 19 A. Yes. 20 Q. Just very briefly, sir, I don't think you have looked at 21 this yet. Page 249, tab 10. 22 THE CORONER: Yes. 23 MS HILL: Do we see there, Mr Browder, a letter dated 24 28 January 2011 that is your report to the Swiss 25 authorities, to Dr Beyeler, the Attorney General of</p> <p style="text-align: center;">Page 65</p>	<p>1 right? 2 A. That's correct. 3 Q. You were asked a lot of questions about the threats that 4 you have described being reported to your staff. 5 I think the broad proposition being put to you is that 6 you have simply lied about these, that you in yourself 7 have made these up to suit your political agenda, that 8 there was in fact no contemporaneous threat reported to 9 you by Mr Perepilichny. I think that is the 10 suggestion, at least in the background -- forgive me, it 11 has been put that you have exaggerated the threats that 12 Mr Perepilichny reported to you, not entirely made them 13 up. 14 Is this correct, that very shortly after you 15 discovered the news of Mr Perepilichny's death, you 16 chose to write yourself through your lawyers to Surrey 17 Police to alert them to the risk that this was another 18 murder. Is that right? 19 A. That's correct. 20 Q. Can I ask the learned coroner please to look at these 21 letters just very briefly and I think the best copies of 22 the letters, sir, if I may, are in bundle 4.1, page 159 23 because you can actually see them on the headed letter 24 there, not within the Surrey Police documentation. 25 Page 159, sir, if I may. Do you have that</p> <p style="text-align: center;">Page 67</p>
<p>1 Switzerland? 2 A. That's correct. 3 Q. The learned coroner can see, can he, that that letter 4 runs through to page 271 and it includes within it 5 a detailed analysis of the account documentation, if you 6 look on 252, the various steps in the fraud as you 7 understand them to be and in the transfer of the 8 proceeds of the fraud, in particular, is that right? 9 A. That's right. 10 Q. It does refer to Mr Magnitsky as you see at page 256; is 11 that right? 12 A. That's correct. 13 Q. Then what the learned coroner can just perhaps keep 14 a hand in or have a quick skip through, is from 272 15 onwards through to 299, the learned coroner can see, can 16 he, the various Credit Suisse documents, bank 17 statements, financial materials, that show what you say 18 the letter summarises. Is that right? 19 A. And these were the documents provided by 20 Alexander Perepilichny in the series of meetings. 21 Q. For completeness, is this right, that although the 22 information Mr Perepilichny provided was crucial and no 23 doubt the Swiss authorities would have been keen to hear 24 further evidence from him as necessary, that that 25 investigation has continued despite his death. Is that</p> <p style="text-align: center;">Page 66</p>	<p>1 Mr Browder, page 159, it should be the Brown Rudnick 2 letter to Surrey Police, the chief constable, dated 3 17 November 2012. 4 A. Yes. 5 Q. Just looking through this correspondence fairly briefly 6 if I may, if you look over the page, this is a short 7 letter, it is a two-page letter, but it makes clear, 8 doesn't it, that there was a concern here that 9 Mr Perepilichny had been an informant in the money 10 laundering case, there was a concern that he had 11 provided significant information and was at risk and if 12 you look over the page, it says: 13 "We do not know whether or not his death was as 14 a result of natural causes but in light of his ongoing 15 provision of important information in an internationally 16 publicised case involving Russian corruption and 17 organised crime, we want to provide you with this 18 information as it could be relevant." 19 Do you see that, it is 17 November? 20 A. Yes. 21 Q. Going over the page to 27 November 2012, your evidence 22 I think has been that you had no response to that letter 23 to the police, so is this right on 27 November, 24 a different law firm wrote to the learned coroner in 25 a much more detailed way setting out similar concerns?</p> <p style="text-align: center;">Page 68</p>

<p>1 A. Yes. 2 Q. And that in fact that letter explicitly set out at 3 page 163, the nature of the death threats or the fact of 4 the death threats that your client, you and your staff 5 had received, and also flagged the fact that 6 Mr Perepilichny had received death threats? 7 A. That's correct. 8 Q. Then finally on this group of correspondence, you then 9 had a meeting, I believe, members of your team had 10 a meeting with Surrey Police on 6 December. Is that 11 right? 12 A. Yes. 13 Q. If you and the learned coroner go forward, please, to 14 164, you will see a letter dated 18 December 2012. 15 I would ask you to look at this relatively carefully 16 please for the learned coroner as well. Is this right, 17 that you set out in more detail here the specific issue 18 of your contact with Mr Perepilichny and the threats he 19 had received? 20 A. Yes. 21 Q. Forgive me, Hermitage's contact. 22 A. Yes. 23 Q. Made it clear for example that he had used an unusual 24 email address to contact the company, set out your 25 background of your dealings with him, page 165, the</p> <p style="text-align: center;">Page 69</p>	<p>1 A. Yes. 2 Q. What I put to you or suggest to you, is that in late 3 2012, and early 2013, you did then document very clearly 4 to Surrey Police and the learned coroner the threats 5 that you say Mr Perepilichny reported to you? 6 A. That's correct. 7 Q. Do you now understand from looking at other evidence in 8 this case that there is other evidence of 9 Mr Perepilichny's reporting threats that is nothing to 10 do with what he told Hermitage? 11 A. That's correct. 12 Q. Finally I would like to deal if I may, please, with the 13 propositions that were put to you on several occasions 14 by learned counsel to the coroner about whether or not 15 you and Hermitage offered protection to 16 Mr Perepilichny. 17 Is this a fair summary, that when you first met him, 18 you really had no idea who he was other than the fact 19 that he was somebody using the titicoke email address? 20 A. That's correct. 21 Q. In the world in which you sometimes operate, separating 22 out the good guys from the bad guy is not always easy? 23 A. That's correct. 24 Q. As you said yesterday in Russia, rightly or wrongly, the 25 line between those who are criminals and those in the</p> <p style="text-align: center;">Page 71</p>
<p>1 dates of the meetings? 2 A. Yes. 3 Q. Then over the page, towards the foot of 165, reference 4 to the dossier and the hit list? 5 A. Yes. 6 Q. Reference to the meetings at the airports with someone 7 described as being from the interior ministry but 8 I think not believed to be that? 9 A. Yes. 10 Q. Over the page, similar meetings at Mari Vanna in London 11 and at Heathrow? 12 A. Yes. 13 Q. Then reference in the middle of page 166 to the court 14 documents in Moscow that described him as living outside 15 the Russian Federation because he fears for his life? 16 A. Yes. 17 Q. That is a quote, is it not, from Mr Pavlov? 18 A. Yes. 19 Q. Finally on this group, the coroner will have the point 20 I am sure, but your employee, Mr A, for your note, sir, 21 this is page 918 of volume 4.3, you don't need to turn 22 it up now Mr Browder, don't worry about it but if you 23 take it from me that the date that your employee, Mr A, 24 gave a witness statement to Surrey Police was 25 8 March 2013.</p> <p style="text-align: center;">Page 70</p>	<p>1 government is quite blurred? 2 A. That's correct. 3 Q. And when you first met him you were concerned he might 4 be a threat to you and your staff? 5 A. That's correct. 6 Q. Although over time you came to understand that he was 7 a banker for a number of wealthy Russians, including 8 members of the KOCG, you didn't know that when you first 9 met him? 10 A. That is right. 11 Q. And that even when you did come to understand that, you 12 knew therefore that he was a man who was the financier 13 for those involved in organised crime? 14 A. That's right. 15 Q. Did you take the view that he was the best person 16 himself to assess what protection he needed? 17 A. Of course. 18 Q. Had he been an employee of yours, or on your payroll, 19 things would have been very different. Is that right? 20 A. That's right. 21 Q. Would it have been even vaguely appropriate for you, 22 with this complicated world in which Mr Perepilichny 23 appeared to operate, to have arbitrarily chosen to 24 report what he told you to the police? 25 A. It would have been inappropriate and he may not have</p> <p style="text-align: center;">Page 72</p>

<p>1 wanted us to do that because, if we -- knowing what 2 I know now, he was obviously quite concerned about the 3 police knowing his address and other things. 4 Q. Yes, and is this right, that if you had simply reported 5 to the police, as one might think would be appropriate 6 in a normal series of events, that someone had said to 7 you, "I have had a threat made to me", if you had 8 reported that to the police without that being something 9 that very clearly Mr Perepilichny wanted, that could 10 have in fact put him in more danger? 11 A. Indeed. Everything we did in connection with the 12 authorities, we always asked him in advance whether he 13 was comfortable with us doing it. 14 Q. Did you have a sense that Mr Perepilichny was himself 15 though fearful for his life? 16 A. Well, he was fearful of the Russians who were after him 17 and he thought that he had made the proper precautions 18 by coming to the UK and living in a guarded compound and 19 generally being far away from the dangers and vagaries 20 of life in Russia. 21 Q. You had understood, had you, that he had not been back 22 to Russia since he left Russia and came to the UK. Is 23 that right? 24 A. That's correct, he was scared of going to Russia because 25 of the people who he had crossed.</p> <p style="text-align: center;">Page 73</p>	<p>1 Q. That he would on occasion arrange to have in person 2 meetings with people on Skype and then have the meetings 3 offline, if you like? 4 A. That's correct. 5 Q. You have seen I think press reporting that both 6 Mr Pavlov and Mr Stepanov have separately said that he 7 was afraid to return to Russia and he lives in hiding; 8 is that right? 9 A. That's right. 10 Q. Bear with me a second, please. 11 A final question for you, Mr Browder, please, you 12 may or may not be able to help with this. 13 When the learned coroner looks at the Skype 14 messages, what he might see is discussions about 15 Mr Perepilichny meeting people at airports, meeting the 16 person in particular said to be Mr Pavlov, and 17 discussions by which Mr Pavlov, if that is him, appears 18 to suggest Mr Perepilichny comes airside, all right, so 19 comes to the side of the airport when you go through 20 security to have a meeting. It appears to be the case 21 that Mr Perepilichny resists that and prefers to meet 22 in Starbucks on the other side, for example. Do you 23 have any view about that that you can offer from your 24 experience of how this world operates? 25 A. I am sorry, I don't.</p> <p style="text-align: center;">Page 75</p>
<p>1 Q. Again, sir, I don't want to spend too long on it because 2 this is perhaps more for Mr Pollard, but within 3 volume 5.1, page 224 is a list of in and out airport 4 records for Mr Perepilichny. For your note, sir, as 5 I say, it is volume 5.1, page 224 and it runs from 6 September 2009 through to April 2012. All right, so it 7 runs from the period when he left Russia to a period 8 within a few months of his death -- forgive me, it is 9 over the page, it goes right up to 3 November 2012, so 10 it goes right up to the date of his death. 11 Again there will no doubt be questions about this if 12 need be but the last entry I can see on that for Moscow, 13 Russia is November 2009. 14 A. That's right. 15 Q. Does that chime with your understanding, that he never 16 in fact went back to Russia after he left? 17 A. He never in fact went back to Russia and I was kind of 18 surprised when his wife said he had, because we knew 19 that he hadn't. 20 Q. Is it your understanding from looking at the evidence in 21 this case now that he had different email addresses and 22 Skype accounts that he was using? 23 A. That's correct. 24 Q. That he had different phones that he was using? 25 A. That's correct.</p> <p style="text-align: center;">Page 74</p>	<p>1 MS HILL: Thank you very much, sir, nothing further. 2 MR SKELTON: Sir, unless you have any follow up questions 3 I have one very small issue, which will take a minute to 4 deal with just for clarification if I may. 5 THE CORONER: Of course. 6 Further questions from MR SKELTON 7 MR SKELTON: Mr Pastukhov. 8 A. Yes. 9 Q. I think you said yesterday he was a lawyer for you -- 10 A. Yes. 11 Q. -- was that his only relationship with you or was he 12 an employee in any other capacity? 13 A. He was what I call an in-house lawyer, so he was 14 an employee and a lawyer. 15 Q. An in-house lawyer, did he, as I understood you said 16 yesterday, attend the meetings with Mr Perepilichny? 17 A. He did. 18 MR SKELTON: Thank you. 19 MR MOXON BROWNE: Sir before you consider rising perhaps for 20 a break, can I raise a short housekeeping matter. 21 THE CORONER: Yes, have we finished with Mr Browder? 22 MR MOXON BROWNE: I do apologise, I thought you had. 23 THE CORONER: Thank you very much. 24 A. Thank you. 25 MR MOXON BROWNE: I am sorry, sir, you might have had some</p> <p style="text-align: center;">Page 76</p>

<p>1 questions.</p> <p>2 THE CORONER: No.</p> <p>3 MR MOXON BROWNE: We are coming up to a three-day break and</p> <p>4 I think certainly speaking for myself and probably</p> <p>5 others will wish to remove all their papers, which in my</p> <p>6 case at least is a lot. And I need to make arrangements</p> <p>7 for assistance to do that.</p> <p>8 Are you able to at this stage give any indication</p> <p>9 perhaps of how long you would sit today?</p> <p>10 THE CORONER: Yes, I didn't think today -- I mean we have</p> <p>11 gone on long some days. I was not -- subject to there</p> <p>12 being some awful problem that we are in the middle of</p> <p>13 something or someone that they cannot come back --</p> <p>14 really proposing to go on much beyond 4.00 today.</p> <p>15 MR MOXON BROWNE: Thank you very much, that is a huge help.</p> <p>16 MR SKELTON: Sir, to clarify, an early lunch I think today,</p> <p>17 so in fact after our break we will sit until 12.30.</p> <p>18 THE CORONER: Yes, if we could do lunch between 12.30 and</p> <p>19 1.30 today, that would help me.</p> <p>20 MR SKELTON: Thank you, shall we have a 10-minute break?</p> <p>21 THE CORONER: Certainly.</p> <p>22 (11.40 am)</p> <p>23 (A short adjournment)</p> <p>24 (12.00 pm)</p> <p>25 MR SKELTON: Sir, the next witness is Detective</p> <p style="text-align: center;">Page 77</p>	<p>1 Q. Had you had experience of investigating sudden deaths?</p> <p>2 A. Yes, sir, I had investigated a number of sudden deaths</p> <p>3 over my police service.</p> <p>4 Q. Can you give us an idea of how many?</p> <p>5 A. Not numerically but a large number from a detective</p> <p>6 constable through to my time on the major crime team,</p> <p>7 sir.</p> <p>8 Q. Murder investigations?</p> <p>9 A. Murder investigations, I have worked on those at</p> <p>10 different ranks as a detective constable, sergeant,</p> <p>11 inspector and chief inspector.</p> <p>12 Q. Would you have been an SIO on murder investigations?</p> <p>13 A. Yes, I would, sir.</p> <p>14 Q. What level of officer can become a SIO on a murder</p> <p>15 investigation?</p> <p>16 A. In our force it is at the rank of detective chief</p> <p>17 superintendent -- sorry, detective chief inspector is</p> <p>18 normally appointed a senior investigating officer and</p> <p>19 they have a deputy senior investigating officer, which</p> <p>20 is a detective inspector in most cases, sir.</p> <p>21 Q. How long had you been a chief inspector?</p> <p>22 A. I had been a chief inspector for six years at that</p> <p>23 point.</p> <p>24 Q. Had you been an SIO during that period, or throughout</p> <p>25 that period?</p> <p style="text-align: center;">Page 79</p>
<p>1 Superintendent Pollard.</p> <p>2 DS IAN POLLARD (sworn)</p> <p>3 A. Good afternoon, sir, my name is Ian Pollard. I am</p> <p>4 a detective superintendent with Sussex Police.</p> <p>5 THE CORONER: Sit or stand, whichever you like.</p> <p>6 A. I may sit, thank you.</p> <p>7 Questions from MR SKELTON</p> <p>8 MR SKELTON: Superintendent Pollard, you have made two</p> <p>9 statements in the context of this Inquest. The first</p> <p>10 was made last year, signed 12 August. Do you have that</p> <p>11 in front of you?</p> <p>12 A. Yes, I do, sir.</p> <p>13 Q. The second statement was made more recently, a shorter</p> <p>14 statement, and that is dated 19 April this year. Do you</p> <p>15 have that in front of you as well?</p> <p>16 A. Yes, I do, sir.</p> <p>17 Q. Are those statements true to the best of your knowledge</p> <p>18 and belief?</p> <p>19 A. Yes, they are, sir.</p> <p>20 Q. Can I start by asking what your rank was at the time of</p> <p>21 the investigation or your involvement with the</p> <p>22 investigation?</p> <p>23 A. Yes, at the time of the investigation, I was a detective</p> <p>24 chief inspector working on the Surrey and Sussex major</p> <p>25 crime team.</p> <p style="text-align: center;">Page 78</p>	<p>1 A. I had been a detective chief inspector responsible for</p> <p>2 the policing of Brighton & Hove division, with</p> <p>3 responsibility for investigations, child protection,</p> <p>4 intelligence units, functions, for four years, as</p> <p>5 a detective chief inspector. Then I moved to a policing</p> <p>6 district as the district commander for that area</p> <p>7 responsible for neighbourhood policing and response</p> <p>8 policing. And in November 2012 I moved across into the</p> <p>9 Surrey and Sussex major crime team as an SIO.</p> <p>10 Q. During my questioning I am going to focus on the types</p> <p>11 of evidence that you and your team sought and</p> <p>12 considered, the limits of your investigation, so where</p> <p>13 you stopped investigating for one reason or another, and</p> <p>14 the reasons you have reached the conclusions you did</p> <p>15 about Mr Perepilichny's death.</p> <p>16 Can I start by clarifying that you became involved</p> <p>17 formally from 28 November 2012; is that correct?</p> <p>18 A. That's correct, sir, yes.</p> <p>19 Q. Prior to that, had you had any involvement at all?</p> <p>20 A. No, sir.</p> <p>21 Q. As far as the events that occurred between the 10th and</p> <p>22 28th, were you reliant on reading reports from your team</p> <p>23 or speaking to them?</p> <p>24 A. The events of the 10th to the 28th relied on the</p> <p>25 investigation that had been conducted by officers from</p> <p style="text-align: center;">Page 80</p>

1 **Staines CID, yes.**
 2 Q. First of all, evidence at the scene. We have heard from
 3 two police officers that the civilian bystanders were
 4 interviewed and there were paramedics on the scene who
 5 the officers spoke to and as a result of that, the
 6 conclusion was reached that nothing suspicious had been
 7 seen.
 8 **A. That's correct, yes.**
 9 Q. Were you aware that Mr Perepilichny's body was checked
 10 by two detectives as well?
 11 **A. Yes, they did check it on the night, I am aware of that.**
 12 Q. What was the result of that check?
 13 **A. Their check did not identify any signs of injury. They**
 14 **had excluded a road traffic collision as a possibility**
 15 **and found no signs of any evidence of assault.**
 16 Q. Are you aware that SOCO were not called out to the
 17 scene?
 18 **A. I was aware of that and the reason for that, on the**
 19 **night, was that the decision taken by DCI Collwood was**
 20 **that the death was not suspicious, and therefore that**
 21 **was the reason why scenes of crime did not attend,**
 22 **because they only attend deaths that are classified as**
 23 **suspicious or confirmed murders.**
 24 Q. DCI Collwood stated in his evidence that had he known of
 25 the involvement or the alleged involvement of

Page 81

1 Mr Perepilichny with the Hermitage related fraud, he
 2 would have thought the death was suspicious and would
 3 have triggered a SOCO investigation. Do you accept that
 4 as a judgment that might have been made?
 5 **A. If the information contained in the letters or the**
 6 **letter that was sent in on 17 November from**
 7 **Brown Rudnick, if that information had been known on the**
 8 **night, then yes, of course that would have determined**
 9 **the fact that we may have needed to conduct further**
 10 **inquiries, treat the death as unexplained and conduct**
 11 **detailed tests, which is what I did when I was appointed**
 12 **as SIO on 28 November.**
 13 Q. Just focusing on the SOCO team and photographic team,
 14 would they have been called out in those circumstances?
 15 **A. If that death had have been determined as suspicious**
 16 **based on that information, as I have explained, then**
 17 **yes, a scenes of crime team would have attended, along**
 18 **with a senior investigating officer to then take on that**
 19 **investigation.**
 20 Q. Would that have resulted in a wider search for
 21 incriminating items at the scene?
 22 **A. Possibly, it is difficult to say because obviously on**
 23 **examination of the body there was no obvious signs of**
 24 **injury, so therefore the parameters of that search, you**
 25 **cannot really determine those or set those until you**

Page 82

1 **know what you are doing at the scene at the time.**
 2 Q. Would it have led to the phones that were found at the
 3 scene being seized and interrogated prior to being given
 4 back?
 5 **A. Yes, they would certainly have been retained.**
 6 Q. Would it have led to a greater level of house-to-house
 7 follow up. As we know, quite a few addresses it seemed,
 8 no one answered. Would that have continued until
 9 answers were found if people were resident?
 10 **A. It would have been reviewed. I think a lot of that**
 11 **would have depended on the Home Office or what would**
 12 **then have been a forensic Home Office post mortem but**
 13 **the house to house may well have been reviewed but not**
 14 **necessarily extended on the night.**
 15 Q. What would have happened in respect of any CCTV that was
 16 available going in and out of the estate or elsewhere
 17 within it?
 18 **A. Well, again that would have been a line of inquiry to**
 19 **obtain that CCTV or secure it at that stage to secure**
 20 **and preserve evidence until we knew whether the death**
 21 **was suspicious or not.**
 22 Q. Beyond those things I have asked you about, would there
 23 have been other avenues of investigation which would
 24 have been triggered by it being nominated to be
 25 a suspicious death?

Page 83

1 **A. Well I suppose the investigations and inquiries that**
 2 **I took on on the 28th would have been triggered earlier**
 3 **if that information was known at that time.**
 4 Q. That might include for example a forensic post mortem as
 5 opposed to a coronial post mortem?
 6 **A. Oh no, definitely, there would have been a forensic post**
 7 **mortem had the death been determined as suspicious based**
 8 **on the information that we now know and, yes, there**
 9 **would have been a forensic post mortem.**
 10 Q. And photographs of the scene?
 11 **A. Yes, we would have taken photographs of the scene for**
 12 **interpretation, if anything. I mean they wouldn't**
 13 **necessarily have told us a lot but we would have done,**
 14 **yes.**
 15 Q. Based on your experience as a senior detective, from
 16 what you know of the witness evidence and what was found
 17 at the scene, including the checks on Mr Perepilichny's
 18 body, leaving aside information about his background, do
 19 you consider that his death was suspicious.
 20 **A. No. Not in the absence of any information to the**
 21 **contrary that was known on the night, no.**
 22 Q. There did come a time where the Chief Constable I think
 23 was contacted by Brown Rudnick, lawyers for Hermitage?
 24 **A. Yes, that's correct.**
 25 Q. Is that what precipitated your involvements with the

Page 84

1 investigation?
 2 **A. Yes, it was, sir.**
 3 Q. Prior to that, had it been in the control of a more
 4 junior detective?
 5 **A. Yes, it was DC Burden who was the detective that was**
 6 **dealing with what was then determined to be a coroner's**
 7 **inquiry and he was preparing a report for the coroner.**
 8 Q. Can I ask you to look at, there is a bundle we have
 9 called the Pollard bundle for your own benefit and
 10 I think you should have it in front of you. If you
 11 could look under tab 3, page 305, please. Do you have
 12 that?
 13 **A. Yes.**
 14 Q. It is actually a converted version of the letter --
 15 there is an original but I don't think you need to see
 16 that but this a letter which has become a police
 17 document, presumably by being entered on the HOLMES
 18 system and it is from Brown Rudnick to the Chief
 19 Constable, Lynne Owens, does that letter from
 20 Hermitage's lawyers mention any threats to
 21 Mr Perepilichny's life?
 22 **A. No, it doesn't.**
 23 Q. What it does mention is his involvement with the
 24 investigation into the alleged fraud?
 25 **A. Yes, it does, yes.**

Page 85

1 Q. It was followed up I think by a meeting with Hermitage.
 2 Did you attend that meeting? You mention it on page 55
 3 of your statement.
 4 **A. I didn't attend the meeting, I sent officers from the**
 5 **inquiry team to speak with representatives from**
 6 **Hermitage, sir.**
 7 Q. You send I think three detectives to attend that
 8 meeting, and they meet with Mr Chersakov, Mr Kleiner and
 9 Ms Bischof. Did those officers report to you any
 10 expressions of concern about Mr Perepilichny's safety
 11 raised by the Hermitage attendees?
 12 **A. No, they didn't, sir.**
 13 Q. What then occurs I think is that you do get a letter,
 14 a further letter, from Hermitage, which you will find in
 15 the same bundle which you refer to first of all, can I
 16 take you to your statement at paragraph 61.
 17 **A. Yes.**
 18 Q. Is that when you became aware of potential threats to
 19 Mr Perepilichny's life?
 20 **A. Well, I didn't interpret those as threats because what**
 21 **was reported was the fact that according to their**
 22 **timeline from Hermitage, it was Mr Perepilichny that**
 23 **reported the issue of the Moscow police and the assassin**
 24 **list but he told Hermitage, according to their timeline,**
 25 **that he believed this to be an extortion attempt by the**

Page 86

1 **Moscow police and he did not raise that matter after**
 2 **that.**
 3 **Well, my therefore interpretation of that was that**
 4 **he was not concerned at all and didn't deem that to be**
 5 **a threat.**
 6 Q. Can I just show you the letter itself in which these
 7 issues were raised. You will find it in that same
 8 bundle. There is a big tab and under that big tab it is
 9 big tab 4 under little tab 6, towards the back end of
 10 the bundle?
 11 **A. Big tab 4, did you say?**
 12 Q. Yes, little tab 6 under big tab 4, sorry it is a little
 13 bit complicated. It is page 307, or internal 242.
 14 THE CORONER: You might not be far enough back. There is
 15 a number of fours you have to go through before you come
 16 to --
 17 **A. Did you say little tab 4?**
 18 MR SKELTON: Big tab 4.
 19 THE CORONER: Do you see the 4 is about there? Yes.
 20 **A. Yes.**
 21 THE CORONER: Then 6 in that.
 22 **A. Yes, I've got it.**
 23 MR SKELTON: Thank you. This is I think the letter that
 24 raised with you the threats to Mr Perepilichny's life?
 25 **A. Indeed. So it was explained as they say in a meeting --**

Page 87

1 **so it was the year prior to his death, but as I say,**
 2 **he -- it says in their timeline that, "... informed our**
 3 **clients ... he was of the opinion that it was**
 4 **an extortion attempt by the Moscow police and didn't**
 5 **raise that matter after that", which is what is in my**
 6 **statement.**
 7 Q. There is also mention of a further threat, this is not
 8 specifically a death threat but it is about a meeting
 9 which is said to have occurred which Mr Perepilichny
 10 made Hermitage aware of, with a meeting of
 11 a representative of the interior ministry of Moscow.
 12 You can see that on page 308.
 13 **A. Yes, sorry.**
 14 Q. What did you make of that in terms of the degree of
 15 threat that it indicated?
 16 **A. Well, again, not a lot really. I mean the -- it was**
 17 **an approach to Mr Perepilichny and his response was**
 18 **that he refused to get involved. My interpretation of**
 19 **that is he wasn't intimidated by that, he was not in**
 20 **fear of that, it was an approach made by him, he refused**
 21 **to get involved, and that is what he reported to**
 22 **Hermitage. It wasn't raised subsequent to that.**
 23 Q. When you take that view, do you compare this situation
 24 with situations you have seen where other people have
 25 been allegedly threatened prior to being attacked or

Page 88

<p>1 murdered?</p> <p>2 A. Well, yes, but also, what you do take into account is</p> <p>3 the overall information obtained from the inquiry. So</p> <p>4 at that stage, these are two statements purportedly made</p> <p>5 by Mr Perepilichnyy and at that stage, and since those</p> <p>6 statements were made back in 2011, he clearly didn't --</p> <p>7 he moved freely, he travelled freely, he conducted</p> <p>8 himself as was subsequently found out without any form</p> <p>9 of security. So when you reach those conclusions, you</p> <p>10 have to take it, everything, in its entirety, and</p> <p>11 subsequently of course with examinations of phones,</p> <p>12 there were no other similar threats that I determined</p> <p>13 those to be threats.</p> <p>14 Q. You are running ahead a little, Mr Pollard,</p> <p>15 understandably, I will take you to all of the things</p> <p>16 that you have mentioned in more detail and it may be it</p> <p>17 is artificial to say you look at these things in</p> <p>18 isolation. As you are saying you need to look at the</p> <p>19 whole picture?</p> <p>20 A. Yes.</p> <p>21 Q. You did I think for clarification interview a Mr A, who</p> <p>22 is a Hermitage employee or someone in your team</p> <p>23 interviewed him?</p> <p>24 A. Yes.</p> <p>25 Q. He gave a statement, which Mr Browder referred to</p> <p style="text-align: center;">Page 89</p>	<p>1 A. Thank you.</p> <p>2 Q. Under tab 22 at page 374, I think you will see</p> <p>3 DS Drinkwater's computerised note about Mr Gherson's</p> <p>4 communication.</p> <p>5 A. Yes.</p> <p>6 Q. Do you have that? Midway down the page it says,</p> <p>7 "Telephone call received from a Mr Roger Gherson", do</p> <p>8 you see that?</p> <p>9 A. Yes, yes, I do.</p> <p>10 Q. Mr Gherson appears to be raising concerns about</p> <p>11 Mr Perepilichnyy's safety in the context of the</p> <p>12 Hermitage investigation, but also mentioning that</p> <p>13 Mr Perepilichnyy himself was concerned about his safety?</p> <p>14 A. Yes, it is -- yes, it does, it says that as a result of</p> <p>15 these issues -- so his status in the Inquiry, in the</p> <p>16 Hermitage, yes, as a result of these issues, he is</p> <p>17 concerned regarding his safety:</p> <p>18 "The deceased is alleged to have been concerned</p> <p>19 regarding his safety in recent weeks."</p> <p>20 Is what it says.</p> <p>21 Q. Can I ask you whether or not any steps were taken to</p> <p>22 interview Mr Gherson about this?</p> <p>23 A. Yes, my officers went to speak to Mr Gherson and indeed</p> <p>24 he sent in an email to my officers dated I think</p> <p>25 3 December, in which he says that he has no information</p> <p style="text-align: center;">Page 91</p>
<p>1 yesterday, in which he recorded that in respect of the</p> <p>2 so-called hit list, Mr Perepilichnyy was of the opinion</p> <p>3 that it was an extortion attempt by the Moscow police</p> <p>4 and didn't raise this matter after that.</p> <p>5 A. That statement is a straight lift of this letter.</p> <p>6 Q. It says the same thing?</p> <p>7 A. Yes, it does.</p> <p>8 Q. Thank you.</p> <p>9 You had been, one of your officers, DS Drinkwater,</p> <p>10 was I think contacted by Mr Gherson, who is a lawyer</p> <p>11 representing Mr and Mrs Perepilichnyy at various times?</p> <p>12 A. That's correct.</p> <p>13 Q. What were you told about that?</p> <p>14 A. Well, he is not one of my officers but he's an officer</p> <p>15 from Staines who received a phone call and the call in</p> <p>16 was from Mr Gherson was taken by DS Drinkwater, where</p> <p>17 Mr Gherson raised some concerns around</p> <p>18 Mr Perepilichnyy's death that he felt warranted further</p> <p>19 police investigation.</p> <p>20 Q. Can I ask you to look at bundle 2, which is a police</p> <p>21 bundle.</p> <p>22 A. Bundle 2, sorry.</p> <p>23 Q. Do you have that?</p> <p>24 A. Your colleague is just trying to find it.</p> <p>25 Q. I have a spare one if it is not located more swiftly.</p> <p style="text-align: center;">Page 90</p>	<p>1 to assist or something similar but basically that he had</p> <p>2 no information to provide my inquiry.</p> <p>3 Q. Did you accept that at face value or did it appear to</p> <p>4 you that there had been a backedpalling by Mr Gherson in</p> <p>5 respect of concerns raised immediately at the time?</p> <p>6 A. I mean I accepted it at face value he contacted the</p> <p>7 police to raise concerns, we went to go and see him</p> <p>8 because of those concerns and then he says that he has</p> <p>9 no information to give. So in some respects it was</p> <p>10 quite an anticlimax really from that perspective.</p> <p>11 I didn't read anything into it other than the fact</p> <p>12 that he had no information that would assist my inquiry</p> <p>13 in relation to threats to Mr Perepilichnyy.</p> <p>14 Q. Did he nevertheless encourage you, if you needed</p> <p>15 encouragement, to pursue pathological and toxicological</p> <p>16 investigations into the death?</p> <p>17 A. That was a given from my perspective, sir, from the</p> <p>18 outset based on the initial letters. That work had</p> <p>19 already started and, from my perspective, would continue</p> <p>20 to establish whether or not Mr Perepilichnyy had been</p> <p>21 murdered by poisoning, so that -- his response did not</p> <p>22 change my course of action at that stage.</p> <p>23 Q. Based on what you became aware of in November and</p> <p>24 December 2012, did you take the view that there was</p> <p>25 a prima facie case for those involved with the Hermitage</p> <p style="text-align: center;">Page 92</p>

1 fraud to be motivated to harm Mr Perepilichny, for
 2 example to stop him from testifying, to punish him for
 3 contacting the Swiss authorities or to deter other
 4 people from taking a similar course?
 5 **A. No, I didn't determine there was a prima facie case at**
 6 **all there. What the stages are, really, the cause for**
 7 **concern were raised quite properly and the first course**
 8 **of action was to conduct a forensic post mortem and**
 9 **detailed tests, because the first thing to do is to**
 10 **establish whether or not there is evidence of murder and**
 11 **that is different, and distinctly different, to then**
 12 **establishing a prima facie case about who may be**
 13 **involved and people who may or may not be suspects.**
 14 **The first thing that you need to do is establish**
 15 **whether or not there is evidence of murder and at that**
 16 **point do you then determine what your lines of inquiry**
 17 **are going to be as to who may have been responsible. So**
 18 **there are two distinct stages.**
 19 Q. In this case you nevertheless did try and get more
 20 information from Hermitage and the others about that
 21 motivation, so you were doing some investigation about
 22 it?
 23 **A. Yes, of course. I mean they raised the concerns and we**
 24 **went to go and see them and they didn't produce any**
 25 **direct evidence that they had received of any threats**

Page 93

1 **from Mr Perepilichny. So there were other lines of**
 2 **inquiry that were pursued, not just waiting for the**
 3 **results of those tests.**
 4 Q. Leaving aside the sort of procedural formality of what
 5 you have just explained, in other words you find out if
 6 it is a murder and then look for the motive, do you
 7 accept that his involvement with the Swiss prosecution
 8 of the Hermitage fraud as a whistleblower, it would
 9 seem, would give a motivation for the protagonists in
 10 that fraud to harm him?
 11 **A. It was a line of inquiry, so yes it was something that**
 12 **was -- that ultimately was the reason why the concerns**
 13 **were raised by Hermitage, yes.**
 14 Q. A number of inquiries are set in train, one of which is
 15 to get information about Mr Perepilichny, criminal
 16 background and intelligence. Did you or your officers
 17 receive any information about a criminal record or any
 18 intelligence traces of any significance?
 19 **A. No, we didn't, sir. And they were, if I may say, fairly**
 20 **extensive inquiries that were made with intelligence**
 21 **agencies and law enforcement.**
 22 Q. You conducted financial enquiries into his background?
 23 **A. Yes.**
 24 Q. Was there anything suspicious arising from that?
 25 **A. Not that I discovered or the financial investigator**

Page 94

1 **discovered. I do accept that in some case -- in terms**
 2 **of the limitations of those were based on UK accounts**
 3 **and what we knew of, as opposed to the foreign accounts**
 4 **that he had, which would have required international**
 5 **letters of request to have examined those accounts and**
 6 **I didn't feel at that stage or subsequent that there**
 7 **were grounds to apply for such measures, based on what**
 8 **we knew at the time.**
 9 Q. This court has certainly heard evidence and seen
 10 evidence that he had a large number of companies
 11 overseas, based primarily it seems in Russia and
 12 Ukraine.
 13 **A. Yes.**
 14 Q. Were you aware of that at the time?
 15 **A. Pardon?**
 16 Q. Were you aware of that at the time from your
 17 investigations?
 18 **A. Yes I, think the financial investigator had sort of set**
 19 **out some details of companies that he was connected to,**
 20 **so yes, I was aware of some of his businesses but not**
 21 **necessarily the extent of those businesses or --**
 22 Q. Is it fair to say that you didn't know everything it is
 23 possible to know about the companies or indeed his
 24 business associates?
 25 **A. No, and that again was one of the inquiries that we**

Page 95

1 **tried to obtain from Mrs Perepilichnaya was details**
 2 **about her husband's business affairs and associates, but**
 3 **she didn't seem to know any or certainly didn't provide**
 4 **us with any but all of his businesses were -- appeared**
 5 **to centre in Ukraine and Russia and not in the UK.**
 6 Q. Specifically you wouldn't have known every single
 7 business that he was involved with?
 8 **A. No.**
 9 Q. Would you have been able to find out whether he was
 10 paying protection money in Russia or Ukraine, as
 11 Mr Browder said certainly in regard to Russia was
 12 a common occurrence?
 13 **A. Not from the financial investigations that we did but**
 14 **equally with the other enquiries that were made with the**
 15 **phones, examinations, there wasn't anything found in**
 16 **there that would suggest that he was paying protection**
 17 **money or protection rackets.**
 18 Q. You are reliant on the assessment of the computers and
 19 phones that were seized and investigated, to assess
 20 whether or not he is paying protection money or bribery
 21 or something like that, if that is the case?
 22 **A. They would potentially have provided an indication had**
 23 **that have been the case, yes.**
 24 Q. Likewise, you are reliant on that information, or
 25 partially reliant I should say, in respect of any

Page 96

<p>1 motivation people might have to harm him?</p> <p>2 A. Part of that information would have been relied upon</p> <p>3 but, as I say, it is also looking at other aspects of</p> <p>4 his lifestyle as well, about his travel, his movements</p> <p>5 and so forth, so.</p> <p>6 THE CORONER: All right, now, we are breaking off for the</p> <p>7 lunchtime break a bit earlier today so in fact now until</p> <p>8 1.30, all right.</p> <p>9 As you are in the middle of your evidence, I know</p> <p>10 you will, please be very careful not to talk to anybody</p> <p>11 about it.</p> <p>12 All right, we will stop now until 1.30.</p> <p>13 (12.30 pm)</p> <p>14 (The Luncheon Adjournment)</p> <p>15 (1.38 pm)</p> <p>16 MR SKELTON: Superintendent Pollard, can I ask you about</p> <p>17 insurance and your awareness of Mr Perepilichny's life</p> <p>18 insurance during the course of your investigation.</p> <p>19 A. As I understood it, he had a life insurance policy with</p> <p>20 Aviva that was for £500,000 and he had applied for and</p> <p>21 been successful in a life insurance policy with Legal &</p> <p>22 General, which I believe was for £2 million. They were</p> <p>23 the confirmed ones but I also understood that he may</p> <p>24 have been applying for other insurance applications but</p> <p>25 that they were the ones that I was aware of.</p> <p style="text-align: center;">Page 97</p>	<p>1 A. Right.</p> <p>2 Q. Were you aware that there was any issue about</p> <p>3 anti-selection at the time that you were investigating</p> <p>4 the death?</p> <p>5 A. No, I hadn't heard that phrase before and to my mind</p> <p>6 that would be a matter for Legal & General. They signed</p> <p>7 the policy off and I didn't think anything more of it</p> <p>8 than the fact that he had a policy with them.</p> <p>9 Q. From a police perspective, if someone dies having got</p> <p>10 a lot of life insurance and possibly a lot of life</p> <p>11 insurance without providing full information, does that</p> <p>12 inform your investigation in any significant way?</p> <p>13 A. I think that has to be assessed on a case-by-case basis,</p> <p>14 I don't think you can -- so I would have to ... that</p> <p>15 would have to be a case-by-case basis, looking at the</p> <p>16 background of the individual and all sorts of things.</p> <p>17 Q. Are you in a position to assist the court on how to</p> <p>18 apply that question to the circumstances of this case,</p> <p>19 knowing what you now know?</p> <p>20 A. Well, what I now know, I mean he wanted to take out life</p> <p>21 insurance policy and what I now know is part of the</p> <p>22 reason for that is he was looking to purchase a property</p> <p>23 and in order to purchase a property he was advised to</p> <p>24 take out life insurance to support that. That is my</p> <p>25 understanding.</p> <p style="text-align: center;">Page 99</p>
<p>1 Q. As we understand it now, I think he had £3.5 million</p> <p>2 worth of life insurances which had incepted -- in the</p> <p>3 word that they use -- by the time of his death and had</p> <p>4 applied for a further 5, which would have made it 8.5</p> <p>5 had he been successful on those applications. You were</p> <p>6 aware of only some of that?</p> <p>7 A. Yes, I was.</p> <p>8 Q. Just going back to the figures that you gave, how did</p> <p>9 that inform your thinking about suspicious</p> <p>10 circumstances?</p> <p>11 A. Well, it didn't really because a lot of people take out</p> <p>12 life insurance policies so -- he was a wealthy man and</p> <p>13 I didn't read too much into the fact he wanted to take</p> <p>14 out life insurance policies.</p> <p>15 Q. You were not in court I think when Mr Whitworth gave</p> <p>16 evidence, were you?</p> <p>17 A. No, I wasn't, sir.</p> <p>18 Q. Have you had the opportunity to see his statement?</p> <p>19 A. I haven't, no.</p> <p>20 Q. He uses the phrase anti-selection, which in insurance</p> <p>21 terminology means someone that is effectively putting</p> <p>22 down selections that are not necessarily accurate and</p> <p>23 that gives rise to a concern on the part of the</p> <p>24 insurance company or its underwriter that information is</p> <p>25 being withheld or misrepresented.</p> <p style="text-align: center;">Page 98</p>	<p>1 Q. Beyond that, do you have any view about how suspicious</p> <p>2 that might be from a forensic perspective?</p> <p>3 A. No, I don't, no, I don't.</p> <p>4 Q. Your family liaison officers started to liaise with</p> <p>5 Mrs Perepilichnaya shortly after your appointment?</p> <p>6 A. That's correct, yes.</p> <p>7 Q. They had a meeting with her I think on 29 November and</p> <p>8 again on 30 November at the offices of Gherson</p> <p>9 Solicitors?</p> <p>10 A. Yes, that's correct.</p> <p>11 Q. You were not present at those meetings, it was just</p> <p>12 them?</p> <p>13 A. Yes, that's correct.</p> <p>14 Q. Have you seen the notes they made of those meetings?</p> <p>15 A. Yes, I have.</p> <p>16 Q. Did you also speak to them about the meetings?</p> <p>17 A. Pardon?</p> <p>18 Q. Did you also speak to them about the meetings or did the</p> <p>19 communication about what happened in it occur through</p> <p>20 a written report?</p> <p>21 A. Both written and we did obviously communicate verbally</p> <p>22 as well, yes.</p> <p>23 Q. Thank you. Can I ask you to find a white bundle called</p> <p>24 a witness bundle and look under tab 18, please.</p> <p>25 It is page 406 for those who have untabbed bundles.</p> <p style="text-align: center;">Page 100</p>

<p>1 Top right, 226, if you have the white bundle. 2 THE CORONER: Got that all right? 3 A. Yes, thank you, sir. 4 MR SKELTON: Does everyone have that? In the new bundle it 5 is page 226, it originally appeared in another bundle at 6 page 406. 7 Do you have that, Mr Pollard? 8 A. Yes, I do, sir. 9 Q. You do. This a note, it is actually dated 30 November 10 but it was about a meeting that had taken place the day 11 before at Gherson Solicitors. 12 Three pages in, page 228 on the top right 13 pagination, there is issues of safety discussed. You 14 were aware of this information? 15 A. Yes, I was. 16 Q. If I could divide it into three aspects. 17 First, there is an overheard conversation recorded, 18 where Mrs Perepilichnaya records her husband having 19 a conversation with an unknown person, telling that 20 person that pressure was being put on him and saying 21 that they know where they are living in Surrey? 22 A. Yes. 23 Q. Then she goes on to say that they had had numerous 24 discussions about his concerns to do with their address 25 being discovered as Mrs Perepilichnaya was now on the</p> <p style="text-align: center;">Page 101</p>	<p>1 FLO role with the family and the wife. 2 Q. Ms Taylor has already started giving evidence, as you 3 are probably aware, and will complete her evidence next 4 week so she can speak for herself about this meeting. 5 Within the limits of what you understood had occurred 6 during the meeting, did you think there was any 7 ambiguity about (a) the issue that it was 8 Mr Perepilichnyy that was being put under pressure in 9 this conversation, and (b) it was Mr Perepilichnyy 10 raising concerns about their address being known? 11 A. Well I suppose, yes, there was ambiguity I didn't -- 12 I needed to know more about that conversation and 13 exactly what it meant. 14 Q. Mrs Perepilichnaya has said that there was some 15 misunderstanding about both of those aspects. Taking 16 the first issue, that in fact it was a third party who 17 was being put under pressure which Mr Perepilichnyy was 18 discussing. Did you or your officers ever understand 19 that that was in fact the case? 20 A. Not based on her limited comment made at the time to the 21 FLO and obviously not subsequent, because she didn't 22 elaborate on that. It would have been very helpful had 23 she have said that either at that meeting or following 24 meetings, which was the reason why I said these comments 25 needed to be put into context.</p> <p style="text-align: center;">Page 103</p>
<p>1 police system? 2 A. Yes. 3 Q. Did you take the view that that was -- that overheard 4 conversation and the more general discussions that she 5 was describing there or appeared to be describing there, 6 and I should say it is not accepted by her that she or 7 he was so concerned, was something to follow up in terms 8 of your investigation? 9 A. Yes, it was and that was something I wanted the FLOs to 10 explore further with Mrs Perepilichnaya in order to 11 properly understand the context of what she was saying. 12 Q. Because on the face of it, she is saying (a) somebody 13 may be putting pressure on her husband and (b) he is 14 concerned about people knowing where he lives, so 15 a concern for his safety? 16 A. Yes. 17 Q. What was the result of your family liaison officers' 18 efforts to get more information about this? 19 A. Well, it was quite frustrating because a lot of the 20 communication initially had to be via solicitors, 21 eventually they were able to call at her address, but 22 unfortunately she wouldn't allow them the time long 23 enough for them to discuss in more detail what she meant 24 about those comments, as well as other matters that 25 I would have liked to have been covered as part of the</p> <p style="text-align: center;">Page 102</p>	<p>1 Q. In respect of the concern about the address being found, 2 found out by people, she in her evidence said that there 3 was some communication problem about that with the FLOs, 4 that really her main concerns were really after 5 Mr Perepilichnyy died because she was being doorstepped 6 and harassed by the media. 7 Again, did you at the time get the impression there 8 was any confusion about her husband being concerned as 9 opposed to her being concerned? 10 A. Again, it was difficult to make a proper inference or 11 draw a proper inference from that comment. I know she 12 was concerned about the media intrusion and her address 13 because she made reference to that later on, but as 14 I say, it was very difficult to draw a proper inference 15 from what she was saying, which is why I asked for the 16 FLOs to pursue that and, as I have just mentioned, it 17 would have been helpful if she would have, what she says 18 now, she would have told us at the time. 19 Q. An issue she did raise directly and unambiguously was 20 the fact that there had been a voicemail message after 21 Mr Perepilichnyy died. That you can see referred to in 22 the next paragraph. Could you explain to me the 23 significance of that message in the context of what you 24 were investigating. 25 A. Well, first and foremost it was obviously after the</p> <p style="text-align: center;">Page 104</p>

<p>1 death of Mr Perepilichnyy. So that is fairly 2 significant, really, from my perspective. 3 The second point is about the fact that it was from 4 a mobile -- from a male stating that money had not been 5 transferred and Alexander had until the following 6 Thursday, so two days later, to complete otherwise the 7 task would be carried out or something would happen. 8 I was able, through the FLOs, to clarify a little 9 bit further about that message because 10 Mrs Perepilichnaya at a subsequent meeting said that the 11 voice was polite and that she felt the phone and context 12 of the conversation related to some judicial matter. 13 For that reason, I did not pay too much attention to 14 that voicemail for those reasons. 15 Q. May I turn to the issue of the phones, this is something 16 you deal with in some detail in your statement and 17 I think it is important to understand first of all what 18 happened with the phones, as in where they were located, 19 and then the investigations that were conducted into 20 those that you had. The phones were taken at the time 21 of the death, by the police, two phones? 22 A. Yes, that is correct. 23 Q. And they were handed back to Mrs Perepilichnaya 24 afterwards at some point? 25 A. Yes, that's correct.</p> <p style="text-align: center;">Page 105</p>	<p>1 handsets, and when one was examined, under exhibit 2 number ST/03, it would appear that the handset held 3 information relevant to Mrs Perepilichnaya, so although 4 the SIM card with the mobile telephone number ending 886 5 was in that handset, which was a number attributable to 6 Mr Perepilichnyy, the actual device itself appeared to 7 contain information relating to Mrs Perepilichnaya, 8 suggesting that she had given us her handset. 9 Q. You were able to get some information from the SIM card 10 that appeared to belong to Mr Perepilichnyy but the 11 handset is next to useless? 12 A. Only from the point of view that the contents on there 13 related more to Mrs Perepilichnaya other than 14 Mr Perepilichnyy when you compare it to the other 15 handset, which was his other phone that contained a lot 16 of information that we were able to retrieve from it. 17 Q. Does it follow from that, as a matter of logic, that 18 there was some potential evidence in the other handset 19 that you hadn't tested that may have been belonged to 20 him that may be lost? 21 A. Well, we asked if we could have the other handset, we 22 explained the situation to Mrs Perepilichnaya, but she 23 was not prepared to hand that other handset over because 24 she had already got all her details on it and she wasn't 25 prepared to release it to us.</p> <p style="text-align: center;">Page 107</p>
<p>1 Q. Why were they handed back? 2 A. My understanding was that because the death was not 3 suspicious, the officer did not need the telephones any 4 longer and so therefore he handed them back to 5 Mrs Perepilichnaya because, to their understanding, was 6 that obviously it would be a coroner's inquiry, the body 7 would be released and the funeral would take place and 8 property belonging to Mr Perepilichnyy would be given 9 back to his wife. 10 Q. I think in answer to questions earlier today, I think 11 you said that had the death been suspicious from the 12 start, the phones would have been seized and 13 investigated at the start. Is that correct? 14 A. If it was suspicious at the time, then yes, that is what 15 would happen. 16 Q. Without being handed back? 17 A. Yes, without being handed back. 18 Q. Then the death did become suspicious, because of the 19 information that you received about the alleged 20 involvement in the alleged fraud, and you asked for the 21 phones back or your officers asked for the phones back? 22 A. Yes, we did. 23 Q. Did it then become apparent that one of the phones 24 wasn't Mr Perepilichnyy's phone? 25 A. Yes, what transpired, there were two mobile phone</p> <p style="text-align: center;">Page 106</p>	<p>1 Q. Could you have forced her to do so? 2 A. Not at that stage. I think they are very -- it is 3 a very difficult and delicate situation that we were 4 dealing with at the time. It is an unexplained death 5 and so at that stage I was satisfied that we had 6 sufficient information, quite a lot from the other 7 phone, we were conducting our other inquiries and so 8 I didn't consider it appropriate or proportionate or 9 justified to seek to utilise any powers to retrieve the 10 second handset. 11 Q. Did you consider it a matter of concern that she hadn't 12 been forthcoming in response to your FLOs, I think as 13 you have explained in your statement and explained 14 earlier and had also kept the handset back? 15 A. Again, I think you have to put into context the 16 bereavement that she was going through at the time, the 17 pressure that she was under and it is a very delicate 18 path to tread, so I don't criticise her for that, 19 I don't draw suspicion from that but it was not very 20 helpful. 21 Q. The analysis of the handsets that you did have or the 22 one handset and the SIM card you did initiate, could you 23 explain the parameters of the analysis you initiated and 24 why you set them as you did? 25 A. So the parameters of my investigation, the timeline, was</p> <p style="text-align: center;">Page 108</p>

<p>1 for two weeks. So it was from 27 October up to his 2 death. And I set those time parameters to ensure that 3 they were focused, they were going to be relevant in the 4 lead up to the -- to Mr Perepilichny's death and I felt 5 that they were proportionate, a two-week period was 6 a proportionate period of time in order to examine and 7 assess information obtained during that period and in 8 particularly from the contents from his computer and 9 phones, because that, certainly, in the two weeks prior 10 to his death, if he had have been under any threat 11 I felt it would have been identified in that period.</p> <p>12 Q. Could you turn back to the bundle which had a number of 13 tabs in it, which we are calling the Pollard bundle, 14 please. It is towards the back end of this bundle, 15 under big tab 4, little tab 15, internal page 259, that 16 you will find a report, please.</p> <p>17 A. Yes.</p> <p>18 Q. That is a report from DC Pollard, no relation?</p> <p>19 A. No relation, sir.</p> <p>20 Q. 22 January 2013 and he is a member of your team and he 21 is summarising the findings of phone examinations on 22 ST/02 and ST/03, which are the two phones you did look 23 at?</p> <p>24 A. Yes.</p> <p>25 Q. Just if you could explain first of all that there is</p> <p style="text-align: center;">Page 109</p>	<p>1 that message from Tatiana and when they examined the 2 phone they tried to find that message but there is 3 a false positive date stamp.</p> <p>4 Q. That is exactly it, thank you.</p> <p>5 What was the significance of this message and how 6 did you view it in the overall context of your 7 investigation?</p> <p>8 A. This was the same message that --</p> <p>9 Q. That she had discussed?</p> <p>10 A. -- Tatiana had discussed.</p> <p>11 Although it shows there as a false positive from the 12 phone download, when the computer was examined, this 13 same message appeared on the computer of the same date, 14 I think it was 26 or 20 June 2011.</p> <p>15 Again, the content was the same, so it was 18 months 16 old, there was no other similar message, of a similar 17 nature, found in subsequent messages that were examined, 18 within the timeframe. And I think it is also important 19 that where now all of the Skype translations have been 20 done, if you look for the period of June 2011, in those 21 Skype transcripts, you don't see any similar messages, 22 or any reference to this and so my conclusion then is 23 the same now, that this was not a significant message, 24 it had passed, it was not referred to subsequently and 25 indeed it didn't affect how Mr Perepilichny conducted</p> <p style="text-align: center;">Page 111</p>
<p>1 an analysis of contacts, are you limited in who you can 2 understand Mr Perepilichny is communicating with by the 3 fact that some of his communications may be out of the 4 jurisdiction?</p> <p>5 A. Sorry, what?</p> <p>6 Q. In understanding his list of contacts, if they were UK 7 numbers presumably you could readily find out the 8 people?</p> <p>9 A. Yes.</p> <p>10 Q. Can you do the same exercise if people are regularly 11 contacting overseas people?</p> <p>12 A. No, as I understand you cannot identify those without 13 applying for an international letter of request to that 14 country, it is not as straightforward as it is in the 15 UK.</p> <p>16 Q. You look at the contacts -- I should clarify, this is 17 ST/02, iPhone 5, then Mr Sazonov, is he a Russian 18 speaker?</p> <p>19 A. Yes, he was an employee of Sussex Police and he spoke 20 Russian.</p> <p>21 Q. He analyses messages on that phone?</p> <p>22 A. Yes.</p> <p>23 Q. He finds this particular message that we see here, which 24 is dated 24 December 2011?</p> <p>25 A. No, just obviously we had that message, we knew about</p> <p style="text-align: center;">Page 110</p>	<p>1 himself.</p> <p>2 Q. Can I ask how widely your team looked. You obviously 3 have mentioned the search was directed to the parameters 4 two weeks before, but the message that is picked up here 5 is obviously of some vintage, did you at the time, did 6 any of your team, look more widely, for example in the 7 Skype material?</p> <p>8 A. DC Pollard did and that was more around his professional 9 curiosity in terms of scanning through messages, he 10 found a long message in Russian and Google Translated 11 that message, which is what then he put in his report 12 which relates to a lawsuit that appears to have been 13 taken out. So he did that of himself, more around his 14 professional curiosity as opposed to being tasked with 15 that.</p> <p>16 Q. Just if you go two pages on, to page 261, there is 17 a Skype instant messaging section and there is a long 18 message translated there. Or at least I assume it is 19 translated. Is that what you are referring to?</p> <p>20 A. Yes, I am, sir, yes.</p> <p>21 Q. That was the result of a wider parameter search on the 22 officer's own initiative, was it?</p> <p>23 A. Yes, it was, sir.</p> <p>24 Q. Did he alert you to finding anything else that he viewed 25 as suspicious in context?</p> <p style="text-align: center;">Page 112</p>

<p>1 A. No, he didn't.</p> <p>2 MR SKELTON: Sir, I am conscious of the time.</p> <p>3 THE CORONER: Yes, we have the Skype --</p> <p>4 MR SKELTON: We have, sir, it may be you should rise for two</p> <p>5 minutes whilst we just set it up for you while we stay</p> <p>6 here.</p> <p>7 THE CORONER: Again, you are in the middle of your evidence,</p> <p>8 we are just going to have to interpose something else</p> <p>9 but don't talk to anyone --</p> <p>10 A. No.</p> <p>11 THE CORONER: -- I know you won't.</p> <p>12 Thank you.</p> <p>13 (1.58 pm)</p> <p>14 (A short adjournment)</p> <p>15 (2.03 pm)</p> <p>16 MR WASTELL: Sir, now we are going to hear from Mr Elias.</p> <p>17 MR EUGENE ELIAS (affirmed)</p> <p>18 Questions from MR WASTELL</p> <p>19 MR WASTELL: Can you state your name for the court, please.</p> <p>20 A. Eugene Elias.</p> <p>21 Q. Mr Elias, I ask questions on behalf of the coroner.</p> <p>22 I hope in front of you you have two statements that you</p> <p>23 gave to police dated 10 November 2012, there should be</p> <p>24 a two-page one and a much shorter one, do you have</p> <p>25 those?</p> <p style="text-align: center;">Page 113</p>	<p>1 Q. Now, on that day, that afternoon, you describe how, as</p> <p>2 you got over the crest of the hill, you noticed a man</p> <p>3 running up the hill towards the car, correct?</p> <p>4 A. That's correct.</p> <p>5 Q. He was running in the direction that you had come from;</p> <p>6 is that right?</p> <p>7 A. Yes. That's correct.</p> <p>8 Q. Now, clearly you gave that statement on the day in</p> <p>9 question, your main statement. But can you remember now</p> <p>10 in your mind's eye, that man?</p> <p>11 A. I remember a, you know, middle-aged man running up</p> <p>12 a hill with dark hair. I remember somebody that looked</p> <p>13 very tired, exhausted, after running up a fairly steep</p> <p>14 hill, with a grimace on his face as we drove by.</p> <p>15 Q. Okay. Just before we get to what you can describe of</p> <p>16 him, what was the lighting like at the time? Was it</p> <p>17 dark?</p> <p>18 A. It was not dark, but it was starting -- the sun was</p> <p>19 definitely starting to set, so dusk time. It was, if</p> <p>20 I recall, a, you know, a little bit of a cloudy day but</p> <p>21 it was still semi light out.</p> <p>22 Q. Can you recall where he was in the road, was he in the</p> <p>23 middle, to the left or to the right?</p> <p>24 A. He would have been on the left as we were driving, the</p> <p>25 left-hand side of the road.</p> <p style="text-align: center;">Page 115</p>
<p>1 A. I do.</p> <p>2 Q. Are the contents of those statements true to the best of</p> <p>3 your knowledge and belief?</p> <p>4 A. Yes.</p> <p>5 Q. I am going to ask you questions about what you saw on</p> <p>6 the afternoon of 10 November 2012, the day you gave</p> <p>7 those statements.</p> <p>8 Is it right that at the time you were living in</p> <p>9 Granville Close on St George's Hill estate?</p> <p>10 A. That's correct.</p> <p>11 Q. Now in your statement you describe leaving your house on</p> <p>12 Granville Close as a passenger in your car being driven</p> <p>13 by your wife, correct?</p> <p>14 A. That's correct.</p> <p>15 Q. You were driving along Granville Road. That is away</p> <p>16 from Granville Close, travelling north to south, is that</p> <p>17 right?</p> <p>18 A. Away from the house, yes, going out of the community.</p> <p>19 North to south I am not sure.</p> <p>20 Q. We will come to timings and maps in a moment. But as</p> <p>21 you head down Granville Road away from your house, is it</p> <p>22 right that there is a shallow uphill, you reach the</p> <p>23 crest of the hill and then you go down a much steeper</p> <p>24 hill the other side. Do I have that right?</p> <p>25 A. That's correct.</p> <p style="text-align: center;">Page 114</p>	<p>1 Q. You say you saw him as you got over the crest of the</p> <p>2 hill, how far away from you was he, can you remember</p> <p>3 that?</p> <p>4 A. Maybe 10, 15 feet on the side. 10 feet? I can't recall</p> <p>5 exactly but probably 10 feet.</p> <p>6 Q. As I say, we will look at a map in a moment which may</p> <p>7 help you but for how long do you think he was in your</p> <p>8 vision before you drove past him?</p> <p>9 A. Three, five seconds, something like that, fairly</p> <p>10 quickly.</p> <p>11 Q. So a fairly quick three- to five-second view?</p> <p>12 A. Yes.</p> <p>13 Q. Was he wearing running kit?</p> <p>14 A. I recall shorts.</p> <p>15 Q. Okay. And I think in your statement you describe</p> <p>16 a white T-shirt, second page, of your longer statement?</p> <p>17 A. Yes.</p> <p>18 Q. A white T-shirt, and navy coloured shorts. That is what</p> <p>19 you wrote at the time or said at the time. No reason to</p> <p>20 think that is wrong?</p> <p>21 A. That's right, no reason to think that is wrong.</p> <p>22 Q. You described him as middle aged, dark hair. Did he</p> <p>23 look overweight to you?</p> <p>24 A. No. He did not.</p> <p>25 Q. Now the description you gave of him a moment ago was</p> <p style="text-align: center;">Page 116</p>

<p>1 grimacing?</p> <p>2 A. Correct.</p> <p>3 Q. You have also I think referred to him struggling. How</p> <p>4 did you deduce that he was struggling, was it from the</p> <p>5 grimace or something else?</p> <p>6 A. From the grimace, from his facial expression.</p> <p>7 Q. Was he still running?</p> <p>8 A. As I recall, yes. He was still running.</p> <p>9 Q. What about the colour in his face, do you remember that?</p> <p>10 A. I don't remember that, I am sorry.</p> <p>11 Q. Okay. In your statement at the time, you have recorded,</p> <p>12 again the second page, that his face looked "noticeably</p> <p>13 white and he appeared very unwell by the look on his</p> <p>14 face", do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. When you describe there the look on his face, do you</p> <p>17 think you are describing the grimace or something else?</p> <p>18 A. My thought would be I was probably describing his</p> <p>19 complexion, it looked more white than I might have</p> <p>20 thought. I don't think I was describing the grimace at</p> <p>21 the time.</p> <p>22 Q. Yes. And as you formed the impression as you passed</p> <p>23 him, that you or your wife commented about him, didn't</p> <p>24 you?</p> <p>25 A. That's correct.</p> <p style="text-align: center;">Page 117</p>	<p>1 seen?</p> <p>2 A. There was a little static, I am sorry, could you</p> <p>3 repeat --</p> <p>4 Q. Do you remember speaking to a young policewoman that</p> <p>5 evening about what you had seen?</p> <p>6 A. I do remember that, yes.</p> <p>7 Q. She was taking notes of what you were telling her?</p> <p>8 A. That's correct.</p> <p>9 Q. Let me just read to you the notes that she made, as she</p> <p>10 told us, that were made as you spoke. I appreciate you</p> <p>11 don't have this but what she has written is:</p> <p>12 "Holding his hand, an iPad, possibly had earphones</p> <p>13 in his ears."</p> <p>14 Again, presumably you don't remember that detail now</p> <p>15 some five years afterwards?</p> <p>16 A. I do not remember that detail.</p> <p>17 Q. Fine.</p> <p>18 You could not help us with the colour of the iPod,</p> <p>19 whether it was an iPhone for example, details such as</p> <p>20 that?</p> <p>21 A. No, I cannot.</p> <p>22 Q. Again, going back to your statement, you describe his</p> <p>23 right arm being across his stomach.</p> <p>24 This is four lines from the bottom if you want to</p> <p>25 just refer to it. Again, do you remember that now?</p> <p style="text-align: center;">Page 119</p>
<p>1 Q. Do you recall, and we can look in the statement if we</p> <p>2 need to, but do you recall what you said?</p> <p>3 A. Recalling something of the sort, "He should not be</p> <p>4 running, he should be walking".</p> <p>5 Q. That comment, was that concern or was that in the manner</p> <p>6 of comedy as we might pass a runner and say, "He</p> <p>7 shouldn't be doing that"?</p> <p>8 A. The latter, so more of a comedy.</p> <p>9 Q. And again in the impression you formed in those seconds</p> <p>10 you passed him, did you think, if you formed</p> <p>11 an impression, that it was as a result of his lack of</p> <p>12 fitness or some other reason that he was looking as he</p> <p>13 did to you?</p> <p>14 A. It would have been a lack of fitness after running up</p> <p>15 a big hill.</p> <p>16 Q. You looked at this man as if he was simply unfit,</p> <p>17 struggling and grimacing, is that a fair summary?</p> <p>18 A. That is a fair summary, yes.</p> <p>19 Q. Now, in your statement, you describe that in his hand,</p> <p>20 this is the first page, towards the end, he had an iPod</p> <p>21 possibly. Can you remember that now?</p> <p>22 A. I cannot remember that now.</p> <p>23 Q. Okay. I think, although it is not in your statement --</p> <p>24 let me put it this way, do you remember speaking to</p> <p>25 a young policewoman that evening about what you had</p> <p style="text-align: center;">Page 118</p>	<p>1 A. I do not.</p> <p>2 Q. You cannot help us with whether he was simply holding it</p> <p>3 across his stomach or gripping or for how long it was</p> <p>4 there, any of those --</p> <p>5 A. I cannot recall. I cannot recall.</p> <p>6 Q. You can't presumably recall whether or not he had</p> <p>7 a water bottle with him?</p> <p>8 A. No, I cannot.</p> <p>9 Q. Thank you.</p> <p>10 Let's look at the map and see if we can identify</p> <p>11 where he was. I hope, if technology has assisted us,</p> <p>12 you have a colour map there --</p> <p>13 A. I have a map.</p> <p>14 Q. -- and a smaller map. Do you have two maps?</p> <p>15 A. I have one map of the -- it looks like of</p> <p>16 St George's Hill.</p> <p>17 Q. Is it in colour, is it A3?</p> <p>18 A. It is printed out black and white.</p> <p>19 Q. Okay, let's work with the black and white one.</p> <p>20 A. Okay.</p> <p>21 Q. Now, do you see at the top there, Granville Close where</p> <p>22 you were living at the time?</p> <p>23 A. Yes.</p> <p>24 Q. Do you see Granville Road as you come down from</p> <p>25 Granville Close?</p> <p style="text-align: center;">Page 120</p>

<p>1 A. Yes.</p> <p>2 Q. Do you see at the bottom the junction with West Road?</p> <p>3 So follow Granville Road down, almost to the bottom of</p> <p>4 the page.</p> <p>5 A. Okay.</p> <p>6 Q. Do you see the junction --</p> <p>7 A. The map is printed out, unfortunately it is very small.</p> <p>8 Q. Do you see the triangle of grass where Granville Road</p> <p>9 meets another road?</p> <p>10 A. Yes.</p> <p>11 Q. You see that?</p> <p>12 A. Yes, I do.</p> <p>13 Q. Certainly on my copy that is West Road.</p> <p>14 A. Okay.</p> <p>15 Q. Can you help us with where the steep hill starts and</p> <p>16 where you get to the crest of it on that map?</p> <p>17 A. As I recall, it would have been, if you look at the map</p> <p>18 on the left-hand side, there is an empty space right,</p> <p>19 with no housing there. Probably the --</p> <p>20 Q. Sorry, can I pause you there, is this three houses down</p> <p>21 from Granville Close?</p> <p>22 A. Yes.</p> <p>23 Q. Yes, so it looks like an area of park on the map?</p> <p>24 A. Yes. It has no shading, it is just empty, it looks like</p> <p>25 an empty lot.</p> <p style="text-align: center;">Page 121</p>	<p>1 of the hill before you saw the man?</p> <p>2 A. Yes.</p> <p>3 Q. You must have passed, if that is right, beyond the two</p> <p>4 houses below the empty lot?</p> <p>5 A. Yes. I mean I can't specify exactly where the crest is</p> <p>6 as it relates to this map and the two houses to be</p> <p>7 honest with you. Looking at it, it is going to be</p> <p>8 around, you know, the second -- the first and second</p> <p>9 house after the empty lot, around that area. That is</p> <p>10 my --</p> <p>11 Q. Approximately in metres how far was he from the top of</p> <p>12 the hill when you saw him?</p> <p>13 A. I can't recall metres, how far he was.</p> <p>14 Q. Is he 2 metres, 100 metres, just give us an order of</p> <p>15 magnitude?</p> <p>16 A. So probably it would be 2 to 5. Somewhere around there.</p> <p>17 Q. Pretty close to the top?</p> <p>18 A. Yes, yes, towards the top. That's correct.</p> <p>19 Q. Okay, we will come back to the map in a moment. Let's</p> <p>20 just deal with timings.</p> <p>21 You spoke to another officer, a DC Pollard, I think,</p> <p>22 on 7 December. Do you remember that? I hope you have</p> <p>23 his statement.</p> <p>24 A. Yes, I have his statement.</p> <p>25 Q. You were able to give quite precise timings as to when</p> <p style="text-align: center;">Page 123</p>
<p>1 Q. Yes.</p> <p>2 A. Okay, so from there I would say two and a half -- two to</p> <p>3 two and a half houses down, south of that, would be</p> <p>4 where the hill is, right around there.</p> <p>5 Q. Yes, and does it run all the way down to that junction</p> <p>6 that I have described as with West Road, can you recall</p> <p>7 that? Don't guess if you can't?</p> <p>8 A. I won't guess then.</p> <p>9 Q. Okay.</p> <p>10 How far -- I probably gave you that one -- from the</p> <p>11 top of the hill did you see this man?</p> <p>12 A. Where he was, running up the hill, would have been, if</p> <p>13 I recall correctly, close to where the houses --</p> <p>14 Q. Sorry, you shall going to have to repeat that, I think</p> <p>15 you broke up. Close to where?</p> <p>16 A. So where the empty lot is, there is another house south</p> <p>17 of that, it would have been around that area.</p> <p>18 Q. I am not following you. I may have misunderstood you,</p> <p>19 I had understood you to be saying that the hill crest</p> <p>20 was two houses below the empty lot, about?</p> <p>21 A. Yes.</p> <p>22 Q. Yes? So as you --</p> <p>23 A. Yes, it's probably closer to the first house.</p> <p>24 Q. Let me just finish, you told me as you drove from</p> <p>25 Granville Close, at the top, you had got over the crest</p> <p style="text-align: center;">Page 122</p>	<p>1 you thought you saw this man?</p> <p>2 A. Yes.</p> <p>3 Q. Can you just help us, you were at the time heading for</p> <p>4 a train?</p> <p>5 A. That's correct, we were heading to drop our nanny off at</p> <p>6 the train station.</p> <p>7 Q. I think you say there it was a 4.50 train in the</p> <p>8 afternoon?</p> <p>9 A. Yes, that is what the record says, yes.</p> <p>10 Q. Do you remember this now or not?</p> <p>11 A. No, I don't remember what time the train was --</p> <p>12 Q. Okay. But do you remember --</p> <p>13 A. -- all (Inaudible).</p> <p>14 Q. Do you remember missing it?</p> <p>15 A. I actually do not remember missing it.</p> <p>16 Q. You cannot help us beyond what is in this report?</p> <p>17 A. That's correct.</p> <p>18 Q. Okay. In which case let me just read to you what it</p> <p>19 says and you can just confirm this is correct to the</p> <p>20 best of your knowledge and belief.</p> <p>21 You saw the male running sometimes between 4.35 and</p> <p>22 4.40 on 10 November. You believe the time would most</p> <p>23 likely have been about 4.38, based on the fact that you</p> <p>24 were late and rushing to catch a 4.50 train, yes? And</p> <p>25 you subsequently missed it.</p> <p style="text-align: center;">Page 124</p>

1 **A. Yes.**
 2 Q. Correct. That is what you said, you cannot take it any
 3 further?
 4 **A. That's what I said, yes.**
 5 Q. All right.
 6 You came back to St George's Hill later that
 7 evening, didn't you?
 8 **A. That's correct.**
 9 Q. You saw presumably paramedics and a police cordon; is
 10 that right?
 11 **A. That's correct.**
 12 Q. Did you link this to the man you had seen before?
 13 Straight away?
 14 **A. Not straight away. No, I did not.**
 15 Q. At what point did you think about the man you had seen?
 16 **A. So this is obviously going off of recollection. At some**
 17 **point in the house, not knowing what was going on and**
 18 **the road being blocked off, I thought that it was**
 19 **prudent to let somebody know what I had seen in case it**
 20 **was related to what we are discussing now. So probably,**
 21 **you know, after getting home, 15, 20 minutes of being**
 22 **inside the house, I decided at some point to go outside**
 23 **to understand what was going on, as well as relaying the**
 24 **information I had.**
 25 Q. Understood.

Page 125

1 At some point in that conversation with the police
 2 you mentioned somebody else that you had seen on that
 3 road earlier on in your journey, didn't you?
 4 **A. Yes.**
 5 Q. That was a woman heading in the same direction as your
 6 car, correct?
 7 Look at your statement if you need to.
 8 **A. Yes. As the statement is written that's correct.**
 9 Q. Can you remember her in your mind's eye now?
 10 **A. I can vaguely, and I don't know if it is accurate or**
 11 **not, but an older -- a little bit of an older woman**
 12 **wearing a white Oxford shirt is what I recall.**
 13 Q. Yes. She was on the left-hand side of the road on the
 14 grass, you have described. I think it is in your second
 15 statement we get the direction she is travelling, the
 16 same direction as you?
 17 **A. Yes.**
 18 Q. Do you remember why you mentioned her to the police?
 19 Was it you who volunteered her or was it in response to
 20 a police question about: did you see anybody else near
 21 the scene?
 22 **A. I can't recall whether I did or whether I was asked.**
 23 Q. Just going back to the map, before we deal with your
 24 description of her.
 25 **A. Yes.**

Page 126

1 Q. Again I appreciate it is many years later, you have
 2 described her in your statement as about 200 yards from
 3 the start of the junction with Granville Close. Knowing
 4 what you have told us about where the hill crest was and
 5 the jogger you saw, are you able to position her very
 6 approximately on this map?
 7 **A. I would say that it would have been north of the empty**
 8 **lot, so using that as our marker.**
 9 Q. Yes.
 10 **A. So it would have been much closer to our home, maybe**
 11 **the -- maybe where there are two houses there, around**
 12 **that area.**
 13 Q. Okay. If she is 200 yards from the junction, how far do
 14 you think she was from the jogger you saw?
 15 **A. Look at the map and kind of figure it out if my points**
 16 **are correct, whatever that distance would be.**
 17 Q. Okay, very fair.
 18 If she was travelling in the same direction as you,
 19 and he was travelling towards you, in your assessment,
 20 they were going to converge soon, are you able to give
 21 us a timing on that or not?
 22 **A. No --**
 23 Q. Okay.
 24 **A. -- I couldn't speculate.**
 25 Q. Just in terms of the description of her, you describe

Page 127

1 the Oxford white shirt and possibly a pair of jeans and
 2 in your statement she appeared to be in her 50s and then
 3 you say this:
 4 "She appeared to be walking and staggering."
 5 Walking and staggering, are you able to help the
 6 coroner with what you -- what she was doing and what
 7 your description means?
 8 **A. Unfortunately I am not. I don't remember that.**
 9 Q. Okay. You don't have any recollection of how she was
 10 walking now, beyond what is written in your statement?
 11 You will have to repeat that, we just lost you.
 12 **A. I am sorry, there is static again.**
 13 Q. You have no recollection of I think you were saying
 14 beyond the statement?
 15 **A. One more time, please?**
 16 Q. You have no recollection of how that lady was walking
 17 now, beyond what you have written in your statement?
 18 **A. That's correct.**
 19 Q. Again, just for the record, the police officer recorded
 20 that you told her that the woman was walking back and
 21 forth, you cannot remember that today, can you?
 22 **A. I cannot.**
 23 Q. Again, can't remember if she was holding anything in her
 24 hand?
 25 **A. No, I do not recall her holding anything in her hand.**

Page 128

<p>1 Q. The police officer wrote down that your wife thought she 2 was holding a phone, you cannot say either way now? 3 A. I cannot. 4 Q. Are you able to help us, did you consider her suspicious 5 in any way? 6 A. No, I did not. 7 Q. No, you are not able to help us or no you did not 8 consider her suspicious? 9 A. No, I did not consider her suspicious. 10 Q. Just finally, Mr Elias, before other barristers have 11 a chance to question you, for how long did you live on 12 St George's Hill estate? 13 A. 11 months. 14 Q. Is it right that there were security barriers at the 15 entrances to the estate? 16 A. That's correct. 17 Q. There was an automated number plate recognition system? 18 A. That's correct. 19 Q. You had private patrols around the estate? 20 A. Yes. 21 Q. The estate was full of some rather nice, rather 22 expensive houses if I can put it that way? 23 A. That it was. 24 Q. Just help me with this. Would you characterise it as 25 a guarded compound?</p> <p style="text-align: center;">Page 129</p>	<p>1 Q. Would it be fair to infer from the fact that you 2 mentioned those matters that it is rather unusual to see 3 someone out and about on the roads on St George's Hill 4 unless they are, for example, walking a dog or obviously 5 taking exercise, it is not something that is that 6 common? 7 A. I would not characterise it that way. People do take 8 walks and they don't have to be jogging or they don't 9 have to be walking a dog. 10 Q. No. 11 A. They could just be (Inaudible), an observation. 12 Q. Thank you. You cannot possibly remember at this stage 13 why you particularly mentioned those matters? 14 A. Just describing in the fullest detail what I saw that 15 day. 16 MR MOXON BROWNE: Thank you very much. 17 Thank you. 18 A. You are welcome. 19 Questions from MR STRAW 20 MR STRAW: Mr Elias, I represent Hermitage. 21 A. Thank you. 22 Q. You lived on Granville Close. Can you tell us -- 23 A. That's correct. 24 Q. It is quite a short close; is that right? 25 A. Yes.</p> <p style="text-align: center;">Page 131</p>
<p>1 A. I would. Yes. 2 MR WASTELL: Thank you, I have no further questions. 3 Questions from MR MOXON BROWNE 4 MR MOXON BROWNE: Good afternoon, Mr Elias. 5 A. Good afternoon. 6 Q. I represent Legal & General Insurance, a life insurance 7 company. 8 A. Thank you. 9 Q. I want to ask you about the estate. I think it is right 10 that there are a good number of CCTV cameras dotted 11 about? 12 A. I don't know, I couldn't say. 13 Q. You cannot say, thank you. As far as this lady is 14 concerned, who you observed walking back and forth that 15 you have told us about, nothing suspicious about her but 16 I think you did remark to the police that she wasn't dog 17 walking, that is the case, and it was something that you 18 mentioned, as you will have seen from your statement. 19 Correct? 20 A. If I put it in the statement, yes, it looks like it is 21 correct. 22 Q. You also mentioned that she wasn't what you call "power 23 walking", in other words she didn't look like a lady who 24 was taking exercise? 25 A. That's correct. Yes.</p> <p style="text-align: center;">Page 130</p>	<p>1 Q. Were you aware that Alexander Perepilichny or his wife 2 also lived on that close? 3 A. I was not. 4 Q. You drove out of that close on this day and saw the 5 jogger. Can you just, to be very clear, was he running 6 towards you, so towards the close? 7 A. Yes, he was running towards where I lived as I was going 8 away from where I lived. 9 Q. The woman was between him and the close? 10 A. Yes, that's correct. 11 Q. It sounds like you cannot tell us what he did before you 12 saw him, correct? 13 A. What he did before I saw him? 14 Q. Yes, for example you don't know whether he met the 15 woman, ran away from her and then ran back up towards 16 the close? 17 A. No, I can't. I have no idea. 18 Q. Last question, which is about how he looked. You 19 mention in your statement that the jogger, his face 20 looked noticeably white and he appeared very unwell by 21 the look on his face. 22 Is it right that this was a man who rather than 23 merely appeared to be exerting himself a lot, he 24 appeared to be very unwell? 25 A. I can't say whether he was very unwell. My observation</p> <p style="text-align: center;">Page 132</p>

1 **was somebody running up a big hill that was really**
 2 **struggling and grimacing getting up that hill, so more**
 3 **of a physical exhaustion as I recall. I can't recall**
 4 **today the complexion of his skin.**
 5 Q. One thing in your statement you mention is you noticed
 6 he did not have his hands moving back and forth like
 7 a jogger but it was over his stomach. Was that one
 8 factor that caused you to say he appeared very unwell?
 9 **A. Again, as I mentioned before, I can't remember his arm**
 10 **movements now. Again I think I was just describing what**
 11 **I saw at the time.**
 12 MR STRAW: All right, thank you very much.
 13 **A. You're welcome.**
 14 THE CORONER: Anyone else?
 15 Thank you very much indeed.
 16 MR WASTELL: Thank you, Mr Elias.
 17 **A. Thank you.**
 18 MR SKELTON: Can we carry on with Superintendent Pollard.
 19 DS IAN POLLARD (continued)
 20 Questions from MR SKELTON (continued)
 21 MR SKELTON: Superintendent Pollard, did you also have
 22 an opportunity to look at the computer which belonged to
 23 Mr Perepilichny?
 24 **A. Yes, we did.**
 25 Q. Was that an HP laptop?

Page 133

1 **A. I believe it was an HP laptop, yes.**
 2 Q. Were you told that was the only computer he owned?
 3 **A. Yes, Mrs Perepilichnaya said that was the only computer.**
 4 Q. From your examination of it, or your officer's
 5 examination of it, did you think that was correct or did
 6 you suspect there was another one?
 7 **A. The observations of the lady or the officer that**
 8 **examined it did find some records of business accounts**
 9 **and the like, although she did make a comment that she**
 10 **would have expected to have seen more. There was also**
 11 **evidence that the family had used the computer and so**
 12 **she did think that there may actually be another**
 13 **computer, which is why we asked Mrs Perepilichnaya if**
 14 **there was another computer.**
 15 Q. Just as part of your answer there you said the officer
 16 expected there to be more. Why was that?
 17 **A. Reading her report, I just -- I think because of the**
 18 **nature of his business, I think she perhaps thought**
 19 **there would be more on there than there was, was my**
 20 **interpretation.**
 21 Q. Is this --
 22 **A. Clark-O'Connell.**
 23 Q. -- Ekaterina Clark-O'Connell?
 24 **A. Yes.**
 25 Q. There is a report, which may be the one you are

Page 134

1 referring to, under tab 16, in the big tab 4 again,
 2 page 264.
 3 **A. Yes.**
 4 Q. Is that what you are referring to?
 5 **A. Yes.**
 6 Q. The officer who conducted the forensic examination, is
 7 she trained in searching for material and using the type
 8 of software that you used to extract it?
 9 **A. The extraction was done by Mr Barrington as I understand**
 10 **it and then the product that was extracted was then**
 11 **reviewed by Clark-O'Connell, because she spoke Russian.**
 12 Q. Did you say Mr Barrington, Roy Barrington?
 13 **A. Roy Barrington, yes.**
 14 Q. Could you just summarise the results of the analysis of
 15 the computer?
 16 **A. "So my impression was that this computer was not only --**
 17 **was used not only by Alexander but the family as well.**
 18 **Perhaps he had a different computer, seemed not enough**
 19 **documents, emails or files related containing business,**
 20 **work, leisure or personal information, most retrieved**
 21 **documents, emails, texts are dated 2011, not many for**
 22 **2012."**
 23 **I think that is where she draws her conclusion from**
 24 **there.**
 25 Q. Do you think it is possible that he ran his business on

Page 135

1 his phone using emails, Skype and oral communications?
 2 **A. I do, because there was a lot of transactions and emails**
 3 **and documents that were downloaded from his mobile**
 4 **phone.**
 5 Q. I think you said that you went back or at least your
 6 team went back to Mrs Perepilichnaya to confirm matters,
 7 and were reassured?
 8 **A. She did say that we had his computer.**
 9 Q. Can I just ask you to just comment on an entry, this is
 10 a note from an analyst Suzanne Leadbetter dated
 11 10 January 2013, I will just read out the bit of it that
 12 is salient. It is to DS Best, who is a member of your
 13 team?
 14 **A. Yes.**
 15 Q. From Suzy Leadbetter:
 16 "I have noted from the forensic download of
 17 Alexander's iPhone 5 that he has an entry in his
 18 contacts list of 'Macbook', this is followed by the
 19 words 'I love A ...' which is located in the notes field
 20 associated with that entry. Given that there has been
 21 some suggestion that the laptop provided by
 22 Mrs Perepilichnaya appears to be a family computer
 23 rather than the one used predominantly by Alexander in
 24 order to conduct his business, it may be that this
 25 Macbook is more relevant to the inquiry with 'I love

Page 136

1 A ...' regarded as a potential password. This would be
 2 worthy of consideration with the FLOs."
 3 Is that one aspect which is followed up by your
 4 team?
 5 **A. She was asked, yes, for any other computer, yes.**
 6 Q. Thank you. Going back to the results of the assessment
 7 by Mr Barrington and Ms Clark O'Connor, what was the
 8 result in terms of finding anything that you viewed to
 9 be suspicious of threats or safety issues?
 10 **A. Again, the officer did not report finding any material**
 11 **of that nature other than the same text -- sorry, the**
 12 **same text message dated June 2011 that was on the phone**
 13 **and on the computer there were two other texts that**
 14 **seemed to follow that which were not on the phone so one**
 15 **was, "Do not do silly moves as we have everything under**
 16 **control" and then the third text was, "The details of**
 17 **where to transfer the money will follow your reply**
 18 **decision".**
 19 **So they were two additional messages. Again, you**
 20 **can interpret that either way, that he doesn't have to**
 21 **do anything silly because they have got everything under**
 22 **control or vice versa. However, as I explained earlier,**
 23 **that was the only message of that type that was found.**
 24 **There were no messages of that type found in the**
 25 **two-week timeframe examination that I had asked to be**

Page 137

1 **done. And, as I explained earlier, when you review the**
 2 **Skype messages from June 2011 there is no other similar**
 3 **message of a similar nature making any reference to that**
 4 **at all and so for that reason or for those reasons I did**
 5 **not draw any conclusion from that message around its**
 6 **relevance considering also it was 18 months old and**
 7 **nothing similar was found.**
 8 THE CORONER: What, this is the do not do silly moves one?
 9 **A. That whole text, so it is the bit about the 300,000**
 10 **roubles and then the other two that follow it, yes.**
 11 THE CORONER: They are all at the same time?
 12 **A. As I understand -- yes, that is my reading of that, yes.**
 13 MR SKELTON: It has been suggested that during the months of
 14 2012, that Mr Perepilichny was setting up and attending
 15 meetings with an intermediary, it may or may not have
 16 been a lawyer working for the Klyuev organised crime
 17 group or for some of the conspirators in the fraud, with
 18 a view to somehow settling the dispute that had arisen
 19 between him and the co-conspirators, which was the focus
 20 of the criminal investigation.
 21 If that had been your conclusion at the time, that
 22 there was a back channel going on, around the time of
 23 the Swiss investigation that he was involved with, what
 24 difference would it have made to your thinking in terms
 25 of where to probe, where to investigate?

Page 138

1 **A. You mentioned 2012? Because this is 2011.**
 2 Q. Yes, later on, after he gave testimony I think earlier
 3 in the year?
 4 **A. Yes, in April 2012.**
 5 Q. Yes. There were messages the previous year about
 6 contacts and then there are suggestions that there may
 7 still be some contacts later on. If you had known about
 8 such contacts at any stage during the period of the
 9 investigation, what would you have done?
 10 **A. Well again they may have been relevant but it depends**
 11 **also on the other aspects of the investigation. Most**
 12 **notably the post mortem, the tests, the context of all**
 13 **the other messages because there were other lots and**
 14 **lots of other messages that, again, you know, appeared**
 15 **normal communication. So it is very difficult to draw**
 16 **conclusions or speculate as to what indeed these**
 17 **messages were, or meant, but there was certainly nothing**
 18 **of that nature found in any of the examinations.**
 19 Q. I was asking you just to hypothesise really, if
 20 Mr Perepilichny was engaged with the Swiss criminal
 21 proceedings but was also engaged with a back channel to
 22 somehow compromise his position successfully so that
 23 whoever he had involved in those proceedings was no
 24 longer antagonistic to him, is that something that you
 25 could have investigated?

Page 139

1 **A. Could have, I suppose.**
 2 Q. How would you have gone about that?
 3 **A. Well, again, it depends -- it may have been a relevant**
 4 **line of inquiry that would have been explored subject to**
 5 **the outcome of the tests that was undertaken because,**
 6 **frankly, in the absence of there being, as my conclusion**
 7 **was, that there was evidence of murder and poisoning,**
 8 **then that was not going to be a line of inquiry. Had**
 9 **there been any evidence of murder and poisoning, then**
 10 **these may have been revisited, reviewed and then**
 11 **consideration about how further to progress them but, as**
 12 **I say, it is difficult to make judgments and assessments**
 13 **about individual messages in isolation.**
 14 Q. If it is alleged that Mr Pavlov was an intermediary for
 15 an organised crime group, and if he had got, he did have
 16 contact privately with Mr Perepilichny during that
 17 period, would it have been feasible for you as a British
 18 police officer to have investigated Mr Pavlov's contacts
 19 with Mr Perepilichny from here?
 20 **A. Not in the absence of any identified established cause**
 21 **of death at that time, no.**
 22 Q. If you had had a cause of death, if for example you had
 23 found a poison, a clear evidence of a poison as
 24 eventually occurred of course in Alexander Litvinenko's
 25 case, if you had found a poison and then had evidence

Page 140

1 that he was involved with these proceedings and still
 2 had a relationship with this man who Hermitage say is
 3 a suspicious character, what could you then have done to
 4 initiate an investigation into his involvement?
 5 **A. So on the basis that there is evidence of poison and**
 6 **murder, then obviously I would have had to have reviewed**
 7 **my lines of inquiry and the status of Mr Pavlov in that**
 8 **investigation. And in reviewing that I may have**
 9 **determined he may have been a witness or he may have**
 10 **been a suspect. Either way, clearly I would have wanted**
 11 **to speak to him if that scenario had happened and in**
 12 **doing that, I would have approached the Crown**
 13 **Prosecution Service for an international letter of**
 14 **request authorising my officers to go to Russia to**
 15 **interview and speak with Mr Pavlov around his**
 16 **relationship and the significance of any message or**
 17 **meetings that he had, if that had been the case.**
 18 Q. Have you ever had cause to take such a step with
 19 a Russian suspect or a Russian person of interest?
 20 **A. In relation to this inquiry?**
 21 Q. No – well, yes, in relation to this inquiry first.
 22 **A. No, because there were – I wasn't prepared to conduct**
 23 **any inquiries of people in Russia in the absence of**
 24 **there being an identified and established cause of**
 25 **death. In terms of if there had been evidence of murder**

Page 141

1 and poisoning, and what I would have then wanted to
 2 know, well, when would that have been delivered, how and
 3 where, that would have determined the focus of my
 4 investigation.
 5 If, if, that meant actually it could have been
 6 involved with people in Russia, then, again as I have
 7 explained, I would have applied to the Crown Prosecution
 8 Service for an international letter of request to seek
 9 to make inquiries of those individuals because before
 10 that stage, and before you have such confirmation,
 11 I wouldn't know what status those individuals were going
 12 to be in terms of my investigation. And, frankly,
 13 I wouldn't have even got past the first hurdle because
 14 the first question would be: what is the cause of death
 15 and is it murder? And I can't answer – well can't or
 16 couldn't answer those questions and I would have been
 17 not able to satisfy the legal criteria.
 18 Q. When you say the first hurdle, do you mean the CPS would
 19 have stonewalled you on that basis?
 20 **A. Well they would, because they would have asked what my**
 21 **just cause was for asking for such an application when**
 22 **I haven't got a cause of death.**
 23 Q. Just going back to my original question, whether or not
 24 you have had reason to try that route previously on
 25 another investigation or indeed since with a Russian

Page 142

1 person of interest or a suspect, has that ever occurred?
 2 **A. Not a Russian, I have not been involved in – in**
 3 **Russians, no.**
 4 Q. May I ask you about Mr Perepilichny's activities.
 5 Your team spent time investigating, not simply his
 6 financial background, his family background and so on
 7 but also how he conducted his life. Is that right?
 8 **A. Yes.**
 9 Q. As far as you were aware, did he ever contact the police
 10 with any concern about his safety?
 11 **A. There is no record on our systems that he did, sir, no.**
 12 Q. Did you or were you given any information that he sought
 13 advice from friends or associates about personal
 14 security matters?
 15 **A. Not that was brought to my attention, sir, no.**
 16 Q. Did he instigate any personal security for himself?
 17 **A. No, and that was reinforced by his chauffeur or the**
 18 **person who provided the chauffeurs for him. We spoke to**
 19 **that individual and he didn't ask for any specific**
 20 **security arrangements or security detail, he just had**
 21 **a normal chauffeur service.**
 22 Q. Did he travel or make any other logistical arrangements
 23 which indicated someone who is trying to be discreet or
 24 secretive about those arrangements?
 25 **A. No, not at all, he appeared to travel extensively.**

Page 143

1 **I obtained some flight travel information, that was**
 2 **assessed for a six-month period and it showed him**
 3 **travelling round Europe quite freely and the times that**
 4 **he was taken to the airport by the chauffeur, again,**
 5 **natural, normal journeys with no added security or**
 6 **issues at all.**
 7 Q. If someone wants to behave in a way which is private or
 8 exceptionally private or secretive about their movements
 9 and meetings, what kind of things do you normally find?
 10 **A. Well I don't think they would be as frequent traveller**
 11 **as they were, I would think they would be fairly – not**
 12 **so much a recluse but not as openly available in terms**
 13 **of their use of social media, Skype messaging, travel.**
 14 **You know, he appeared to openly discuss his business**
 15 **over the correspondence that he had, so, you know,**
 16 **anyone seeking to keep a low profile, wouldn't I would**
 17 **suggest operate in that way.**
 18 Q. Your team researched his whereabouts and movements in
 19 the period just before he returned to the UK and he was
 20 in Paris for that weekend?
 21 **A. Yes, he was, he went on the 8th and returned on the**
 22 **10th.**
 23 Q. The information you would given was that he stayed in
 24 the Bristol Hotel?
 25 **A. That's correct.**

Page 144

1 Q. And he booked that paid for that hotel in his own name?
 2 **A. Yes, he did using a credit card in his own name.**
 3 Q. And restaurants likewise it would appear?
 4 **A. Yes, there were a number of transactions on his credit**
 5 **card that showed meals for two people.**
 6 Q. As far as you were aware, is there any evidence that he
 7 booked another hotel?
 8 **A. Not that was brought to my attention and when you look**
 9 **at the invoice or the credit card receipts, they just**
 10 **appear reasonable amounts for two people.**
 11 Q. Is there any evidence that he, or would you know if he
 12 booked a hotel using an alias?
 13 **A. I wouldn't know that, no.**
 14 Q. While he was in Paris he met with another person,
 15 a Ukrainian national. Contact was made with that person
 16 eventually by one of your officers, DC Pollard. Was the
 17 conclusion from that contact that anything untoward or
 18 suspicious had occurred?
 19 **A. No, not at all.**
 20 Q. Did you take the view it was sufficient to have contact
 21 by electronic communications in that case or did you
 22 take the view that it was necessary to pursue it further
 23 to, for example, have a conversation?
 24 **A. Well, no, I mean we tried to call her first, that was**
 25 **rather unsuccessful so we then emailed her so and**

Page 145

1 **ideally it would have been better to have a conversation**
 2 **but she was in Ukraine, I felt it proportionate and**
 3 **appropriate that we could contact her via the email**
 4 **method which I think is what was done in the end.**
 5 Q. In light of that indication that nothing untoward had
 6 occurred, did that inform your decision of how hard to
 7 press for forensic information or evidence from Paris
 8 liaison?
 9 **A. No. That particular thing didn't. My influence or my**
 10 **decision there was based on the meeting held on**
 11 **17 December with the experts at Reading University where**
 12 **a number of expert disciplines were coordinated together**
 13 **and based on the -- well, on based on their advice that**
 14 **was the reason why I did not initiate any examination of**
 15 **the hotel in Paris.**
 16 Q. To clarify, that is a meeting of experts in toxicology
 17 and pathology discussing potential ways in which he
 18 could have been poisoned and whether or not it is likely
 19 that some form of poison could have been administered
 20 whilst he was overseas which then became fatal, lethal
 21 after he arrived home?
 22 **A. That's correct, the meeting included the chief medical**
 23 **officer from Porton Down, the deputy of the Health**
 24 **Protection England, Dr Gent, bone expert, toxicology**
 25 **expert, plant expert, forensic pathologist to discuss**

Page 146

1 **what we needed to search for and during that discussion**
 2 **I asked the question about controlled released**
 3 **medicines. I recorded the response in my notebook that**
 4 **said that that was highly unlikely, that that could have**
 5 **happened, because clearly one of my questions was about**
 6 **could he have been given something in Paris that then**
 7 **took effect over here and, the outcome of that meeting**
 8 **was highly unlikely and in terms of searching the room,**
 9 **they said it is a fishing trip because in the absence of**
 10 **to know what it look for, what would you search for.**
 11 **So for those reasons I actually made a policy entry**
 12 **in my policy book on 18 December following that meeting**
 13 **where I provided the rationale excluding the need to**
 14 **examine the hotel in Paris.**
 15 Q. You were aware of the Swiss proceedings that
 16 Mr Perepilichnyy was involved in?
 17 **A. Yes, I was.**
 18 Q. You contacted Swiss liaison in order to get more
 19 information about that?
 20 **A. Yes, I did.**
 21 Q. And that is Mr Mark Lewis?
 22 **A. It was.**
 23 Q. Is he a Brit or is he a Swiss national?
 24 **A. No, I think he is a Swiss national because I spoke with**
 25 **him and he spoke good English but was a Swiss national.**

Page 147

1 Q. May I ask you to look under 4.2, so it is in that final
 2 section, which is a series of questions directly from
 3 you in fact to Mark Lewis on 4 December.
 4 **A. Yes.**
 5 Q. There are a number of things that you ask about relating
 6 to the Swiss inquiries or investigation, which are the
 7 first questions.
 8 The sixth question on the bullet points is:
 9 "Did he [ie Mr Perepilichnyy] raise any concerns to
 10 you regarding his safety, any threats he may have
 11 received or any other concerns he may have brought to
 12 your attention?"
 13 That I think is answered a few pages on on page 318.
 14 **A. Where have you got that?**
 15 THE CORONER: I think you might have some pages out of
 16 order.
 17 MR SKELTON: Sorry, I am using --
 18 THE CORONER: You have to go on a bit.
 19 **A. I have found them. Yes, he does answer that question.**
 20 MR SKELTON: It is question 6, it is not numbered at the
 21 beginning, it is just bulleted but this is the answer
 22 to that question.
 23 **A. Yes, he numbers the questions, yes.**
 24 Q. He says:
 25 "In the statements and according to its transcripts,

Page 148

1 Alexander Perepilichny didn't do any comments."
 2 He didn't make any comments regarding his safety?
 3 **A. That's correct.**
 4 Q. Can I ask you, beyond that answer by email, did you
 5 speak to Mr Lewis to elaborate on that or was that
 6 sufficient for your purposes?
 7 **A. No, that was sufficient for my purposes because I felt**
 8 **my question was quite clear and that was the answer that**
 9 **they provided.**
 10 Q. He goes on to say, however, that:
 11 "Mr Perepilichny explained that on one of his trips
 12 to Switzerland he had been contacted by a Russian police
 13 officer at the Zurich Airport, this person had advised
 14 him to pass on all case details related to Stepanov to
 15 the Russian media, according to Perepilichny the police
 16 officer's name was Andrei Piatov."
 17 What did you make of that?
 18 **A. Well I didn't know really how to interpret that to be**
 19 **honest because, as I say, it was not saying nothing**
 20 **either way really, it was just saying he was asked to**
 21 **hand over papers by an officer when he was at the**
 22 **airport at Zurich. So I didn't draw too much conclusion**
 23 **around that in terms of the actual answer to the**
 24 **question, which was around threats, well, whether he was**
 25 **after, you know, seeking protection from the Swiss**

Page 149

1 **authorities and that. So that didn't really answer that**
 2 **question and I don't -- didn't draw too much conclusion**
 3 **from that.**
 4 Q. Could you look a little further on, page 231, please.
 5 231. This is a translated part of Mr Perepilichny's
 6 testimony where he is recorded saying:
 7 "From a human point of view I was shocked about what
 8 I had read in the press and I tried to obtain more
 9 information from Hermitage Capital Management, because
 10 I thought I could end up in the same situation as
 11 Hermitage Capital Management or even like
 12 Sergei Magnitsky."
 13 Further on he declares:
 14 "I knew that one of the employees of Hermitage
 15 Capital Management Limited, Sergei Magnitsky, had been
 16 arrested and had died in prison. I was aware of the
 17 list of the officials involved in the death of
 18 Sergei Magnitsky which had been established by Hermitage
 19 Capital Management."
 20 Did you view that as being indicative of someone
 21 that was concerned that his involvement with Hermitage
 22 could get him killed?
 23 **A. No, I didn't because, knowing that information, he was**
 24 **quite prepared to assist the Swiss authorities in their**
 25 **investigation. He was represented at that meeting by**

Page 150

1 **three solicitors, representing Mr Perepilichny, and**
 2 **during that meeting, knowing the risks, he did not ask**
 3 **or seek any security, witness protection or anything**
 4 **else. So I didn't draw any other conclusions from that**
 5 **other than the fact that he, you know, from a moral**
 6 **perspective, wanted to provide information because he**
 7 **had information and that was my conclusion and**
 8 **interpretation of that message.**
 9 Q. Did it occur to you that he might be foolish about his
 10 own or cavalier or reckless or an ingenu about his own
 11 safety?
 12 **A. No, I don't -- well, again, what I know of**
 13 **Mr Perepilichny he was a very bright individual, very**
 14 **well educated man and I think he would have known what**
 15 **the risks were involved, if any, from his perspective**
 16 **and he was quite prepared to assist the Swiss in their**
 17 **investigations and conduct himself and his life and**
 18 **movements and lifestyle in a normal way without changing**
 19 **any of that on what I found from the inquiry.**
 20 Q. It appears from what we know of the Swiss proceedings
 21 that Mr Perepilichny gave evidence to them directly in
 22 person on one occasion?
 23 **A. Yes.**
 24 Q. Then afterwards they interviewed the person who was one
 25 of the subjects of Mr Perepilichny's evidence,

Page 151

1 Mr Stepanov?
 2 **A. Yes, that's right.**
 3 Q. You knew that?
 4 **A. Yes.**
 5 Q. That they were planning on having what they call
 6 a confrontation between the two men?
 7 **A. Yes, that's correct.**
 8 Q. We don't quite know the legal complexities of how that
 9 works but presumably it would have been the two men in
 10 a room being asked questions with a view to determining
 11 who is telling the truth and resolving the position?
 12 **A. I would imagine so, that was my interpretation of it.**
 13 Q. Did you take any view about the timing of
 14 Mr Perepilichny's death vis-a-vis the planned
 15 confrontation between the two men? In other words that
 16 he died not long before that confrontation may have
 17 taken place?
 18 **A. I don't think there was a date set for the**
 19 **confrontation.**
 20 Q. I am not sure there was and I will be corrected, but
 21 I said may take place.
 22 **A. Mr Stepanov, as I understood it, was interviewed on**
 23 **13 September, in fact he was interviewed twice in**
 24 **September I think.**
 25 Q. Yes.

Page 152

<p>1 A. Obviously his account differed to that of 2 Mr Perepilichny's and then -- and I don't understand 3 their legal system but obviously there followed there 4 would be a confrontation, but there was no date set for 5 that confrontation. So, you know, I don't think you 6 could draw any conclusions from there being 7 a confrontation and Mr Perepilichny passing away. 8 Q. None at all. Is the timing really that important, 9 I mean the fact that the Swiss had said this isn't 10 resolved, we are going to have to get the two men here 11 and then one of the men dies, isn't just that very fact 12 in itself give rise to at least a degree of suspicion? 13 A. No, because -- no. No, that doesn't, no. Because he 14 was quite prepared and happy to cooperate in that Swiss 15 investigation. If he had any concerns about that, I am 16 sure he would not have cooperated, in fact even his 17 solicitor was in contact with the Swiss authorities 18 I think right up until October 2012 which was the last 19 letter I think that was sent on behalf of 20 Mr Perepilichny, so, you know, when you take those 21 factors into consideration, no, I don't think that there 22 is a degree of suspicion between a planned future 23 confrontation and him passing away. 24 Q. You referred to some of the expert investigations, I can 25 deal with this relatively shortly because the expert</p> <p style="text-align: center;">Page 153</p>	<p>1 a course that would then give the pathologist the 2 answers he or she needs to determine the cause of death. 3 Q. As you have said, toxicology investigations were gone 4 through and with the source of a multidisciplinary 5 meeting which you mentioned previously as well. 6 Was there anything in that toxicology which included 7 plant toxicology or plant testing through Kew, was there 8 anything in the results of those meetings or your 9 discussions with experts that led you to suspect that 10 this was a murder? 11 A. There were two meetings, one on 17 December, one on 12 20 March. Obviously in between times the experts were 13 conducting their tests. There was -- it was the meeting 14 I think in March about inviting Kew Gardens to conduct 15 some tests on plants or a particular plant aspect that 16 was done. And so again an additional expert was used 17 and the conclusion of all of those tests were that there 18 was no evidence he had been poisoned. And that, along 19 with my other inquiries, led me to my conclusions that 20 he had not been murdered. 21 Q. Were you aware that Dr Ratcliffe had thrown away almost 22 entirely the contents of Mr Perepilichny's stomach 23 which limited the testing by definition of those 24 contents? 25 A. Well obviously from the first post mortem the stomach</p> <p style="text-align: center;">Page 155</p>
<p>1 investigations as you know have now formed part of this 2 investigation. 3 A. Yes. 4 Q. There was an original post mortem by Dr Ratcliffe, 5 a coronial post mortem? 6 A. Yes, that was on 14 November. 7 Q. As far as you were aware did that raise any concerns 8 beyond a medical cause of death, ie the heart issue 9 which was investigated? Did it raise any concerns about 10 third-party involvement or foul play? 11 A. No, Dr Ratcliffe did not identify any evidence of third 12 party assault or of foul play. 13 Q. There is a forensic post mortem which you initiated? 14 A. Yes, and that took place on 30 November. 15 Q. The results of that I think, single word, 16 "unascertained", because Dr Fegan-Earl could not find 17 an obvious cause of death. From your perspective as 18 a police officer, how do you respond to that? 19 A. That is not uncommon, because sometimes, particularly 20 when there was absolutely no evidence of third party 21 restraint, assault, attack, hypodermic injection, alien 22 bodies found in his skin or muscle, so it is not 23 uncommon that at that stage of a forensic post mortem it 24 is unascertained, because you send off samples for 25 toxicology, histology which may help inform or identify</p> <p style="text-align: center;">Page 154</p>	<p>1 contents, the majority of them had been, I think 2 Dr Fegan-Earl did take, you know, quite rightly, samples 3 from other parts of the intestine and stomach. We did 4 use the blood and urine from the first post mortem as 5 well so, you know, this was all discussed at the 6 experts' meeting, they could exclude or eliminate 7 certain things because of lack of symptoms and so forth. 8 So although, you know -- I didn't think that ultimately 9 hindered the tests that were done. 10 Q. From your perspective again, as the SIO, were you 11 conscious that there may be poisons that you may not, 12 even with these investigations, be able to detect? 13 A. In terms of that, I gave that all to the experts because 14 they are the people that know the answers to those 15 questions, I wouldn't pretend to understand or even come 16 up with knowledge of poisons. That was the role of the 17 experts, that is what I wanted them to tell me. 18 Q. It is for the experts is it to say to you, "We have done 19 this set of tests, we now need to pursue a further set 20 of tests because we have not found anything, looking for 21 perhaps a wider range of more subtle poisons" and keep 22 going until they are content that they have reached what 23 they consider to be the end of the line? 24 A. There were no parameters set, my questions were, has he 25 been poisoned? And if so how? When? And so forth.</p> <p style="text-align: center;">Page 156</p>

1 **So they were the experts, that I instructed to do**
2 **those tests, and my – I suppose my faith was in them to**
3 **identify that and tell me their findings.**
4 MR SKELTON: Sir, shall we take a short break?
5 THE CORONER: Yes, certainly.
6 MR SKELTON: Thank you.
7 (3.08 pm)
8 (A short adjournment)
9 (3.22 pm)
10 MR SKELTON: Superintendent Pollard, in light of your
11 officers' investigation of the scene of
12 Mr Perepilichny's collapse, his phones and computer,
13 the witness evidence that you received during the course
14 of your investigations, including from bystanders and
15 from ambulance personnel and others including Mr A,
16 meetings you had with Hermitage, pathological and
17 toxicological investigations and other forms of
18 investigation, intelligence, financial investigations,
19 and your contacts with overseas liaison partners in
20 Switzerland and in Paris, did you form the view at any
21 time that Mr Perepilichny had been murdered?
22 **A. No.**
23 MR SKELTON: Thank you.
24 Sir, that concludes my examination of Mr Pollard.
25 If he may be released for the weekend, we will resume

Page 157

1 his evidence with questions from the interested persons
2 on Tuesday.
3 THE CORONER: Is that all right for you? It is just we are
4 not going to finish you this afternoon and there is
5 something else we can do with the half hour we have. Is
6 that all right?
7 **A. That is absolutely fine, sir.**
8 THE CORONER: Thank you very much.
9 Usual warning which you know about, but Tuesday,
10 first thing Tuesday, 10.00 Tuesday.
11 Thank you very much indeed.
12 **A. Sir.**
13 MR SKELTON: Sir, given that we have some time this
14 afternoon, it is now proposed that Mr Suter will play
15 extracts from some of the tapes of conversations
16 Mr Perepilichny had with a financial adviser, in which
17 discussions were had about life insurance policies.
18 I think it is going to last about 30 minutes, which
19 takes us close to today's deadline of 4.00 pm and as
20 your court official said, at that point we will conclude
21 for the day and vacate the court, and take our files out
22 with us.
23 THE CORONER: Yes.
24 That is fine.
25 We are just going to play these, are we? There will

Page 158

1 not be a witness dealing with these.
2 MR SKELTON: Not at the moment, sir, unless it proves
3 controversial.
4 THE CORONER: Yes.
5 MR SKELTON: The date of the recording, as Mr Suter informs
6 me, is 21 June 2012, starting at 11.36 am.
7 THE CORONER: Thank you.
8 MR SKELTON: They were produced by Mr Suter's witness
9 statement, for clarification.
10 THE CORONER: Good. All right, we will do that then.
11 Thank you very much.
12 (3.26 pm)
13 (Audio recordings played to the court)
14 (4.00 pm)
15 MR SKELTON: Sir, I think that is it.
16 THE CORONER: Thank you very much indeed. I hope you all
17 have good weekends.
18 10.00 on Tuesday. Yes.
19 (4.01 pm)
20 (The inquest adjourned until 10.00 am on Tuesday,
21 13 June 2017)
22
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25

Page 159

1
2
3 I N D E X
4
5 MR WILLIAM BROWDER (continued)1
6 Questions from MR BEGGS2
7 Questions from MS HILL49
8 Further questions from MR SKELTON76
9 DS IAN POLLARD (sworn)78
10 Questions from MR SKELTON78
11 MR EUGENE ELIAS (affirmed)113
12 Questions from MR WASTELL113
13 Questions from MR MOXON BROWNE130
14 Questions from MR STRAW131
15 DS IAN POLLARD (continued)133
16 Questions from MR SKELTON (continued)133
17
18
19
20
21
22
23
24
25

Page 160

A				
A's 49:23 50:10	40:21	adviser 158:16	ambiguity 103:7,11	92:3 107:2 145:3
A3 120:17	Act 12:14	affairs 96:2	ambulance 157:15	145:10
ability 53:10	acting 30:11	affect 111:25	amends 29:4	appeared 72:23
able 1:15 6:6,8,8	action 92:22 93:8	affirmed 113:17	American 36:24	96:4 101:5 102:5
26:18 59:6 75:12	actions 43:19	160:11	amount 3:10 18:11	107:6,10 111:13
77:8 96:9 102:21	active 56:18	afraid 16:3 18:10	amounts 145:10	117:13 128:2,4
105:8 107:9,16	actively 28:19	75:7	analyses 110:21	132:20,23,24
123:25 127:5,20	activism 39:10	afternoon 61:6,6	analysis 5:5,6	133:8 139:14
128:5 129:4,7	activist 37:8,8,9,10	78:3 114:6 115:1	59:23 65:7 66:5	143:25 144:14
142:17 156:12	55:15	124:8 130:4,5	108:21,23 110:1	appears 75:17,20
Abramovich 35:5	activities 39:17,17	158:4,14	135:14	91:10 112:12
absence 84:20	143:4	aged 116:22	analyst 136:10	136:22 151:20
140:6,20 141:23	actual 107:6 149:23	agencies 10:20	Andrei 20:8,14,23	appended 65:3
147:9	added 144:5	54:16 94:21	54:15 58:4 149:16	application 142:21
absolutely 16:22	additional 4:19	agenda 67:7	answer 5:1,11,12	applications 97:24
154:20 158:7	137:19 155:16	agents 5:3,17	6:10 18:1 24:9	98:5
absurd 30:2 42:11	address 20:16,19	ago 116:25	26:13 29:19 31:4	applied 97:20 98:4
42:12	50:24 57:11,18	agree 17:8 31:4	33:5 34:12 38:10	142:7
accept 13:6,7 14:11	58:3 62:16,16,17	32:6 34:9 36:16	40:25 42:14	apply 95:7 99:18
28:13 36:12 46:21	69:24 71:19 73:3	agreed 7:14	106:10 134:15	applying 97:24
48:24 82:3 92:3	101:24 102:21	ahead 89:14	142:15,16 148:19	110:13
94:7 95:1	103:10 104:1,12	air 29:11	148:21 149:4,8,23	appointed 79:18
accepted 22:13	addresses 57:3,5,7	airport 74:3 75:19	150:1	82:11
26:23 92:6 102:6	74:21 83:7	144:4 149:13,22	answered 83:8	appointment 100:5
accepting 26:13	adduce 49:7	airports 70:6 75:15	148:13	appreciate 119:10
58:19	adduced 50:15	airside 75:18	answers 3:11 6:18	127:1
access 18:4,14	52:22 53:9,14	alert 67:17 112:24	83:9 155:2 156:14	appreciated 27:14
accommodation	adhere 18:17,19	alerting 40:9	antagonistic	27:18
61:12,22	adjourned 159:20	Alexander 2:18	139:24	appreciating 29:2
account 26:10	adjournment 77:23	12:24 40:16 41:10	anti-selection	approach 11:22
29:14,15,20 38:1	97:14 113:14	45:3,5 48:2,11	98:20 99:3	88:17,20
46:23,24,25 66:5	157:8	56:23 66:20 105:5	anticipates 55:25	approached 141:12
89:2 153:1	administered 56:11	132:1 135:17	anticlimax 92:10	appropriate 72:21
accounts 28:21	146:19	136:23 140:24	anybody 97:10	73:5 108:8 146:3
74:22 95:2,3,5	admissible 8:14	149:1	126:20	approximately
134:8	admit 23:11	Alexander's 136:17	anyway 10:8 48:8	123:11 127:6
accuracy 37:14	admits 5:11,12	12:24 40:16 41:10	62:20	April 25:17 27:6
accurate 98:22	admitted 6:1	45:3,5 48:2,11	apartment 54:11	74:6 78:14 139:4
126:10	advance 1:12 73:12	56:23 66:20 105:5	54:24	arbitrarily 72:23
accurately 45:22	advice 4:18 5:3,18	132:1 135:17	apologise 9:20	area 39:18 80:6
accused 58:19	6:1 63:23 143:13	136:23 140:24	76:22	121:23 122:17
acknowledged	146:13	140:14	apparent 106:23	123:9 127:12
20:18	advise 4:24 7:2	allegedly 88:25	apparently 6:8	arisen 53:4 138:18
acknowledging	advised 4:25 99:23	allow 65:9 102:22	25:11 54:2	arises 45:16
	149:13	allowed 3:2	appear 24:4 27:12	arising 94:24
		alternatives 13:5		

arm 119:23 133:9	144:2	33:18	33:8 65:14,16,17	begins 52:23 55:13
arm's 12:23	assessment 96:18	authorities 25:15	67:10 69:25 84:18	behalf 13:15 49:11
arrange 75:1	127:19 137:6	40:11 59:24 65:25	94:16,22 99:16	113:21 153:19
arrangements 77:6	assessments 140:12	66:23 73:12 93:3	143:6,6	behave 144:7
143:20,22,24	asset 36:4	150:1,24 153:17	backpedalling 92:4	belief 78:18 114:3
arrest 58:25	assets 3:12	autobiography	bad 46:10 71:22	124:20
arrested 34:24	assiduous 52:11	36:20	bank 36:9 64:22	beliefs 22:15
38:23 150:16	assiduously 37:4	automated 129:17	66:16	believe 2:17,18
arrived 50:18 51:2	assist 49:17 58:7	available 16:17	banker 58:16 72:7	6:23 13:22 15:19
51:4 146:21	92:1,12 99:17	83:16 144:12	banks 28:8	15:23 16:9 20:24
article 7:5,12 41:14	150:24 151:16	avenues 83:23	barbarity 32:16,21	23:13 29:6 31:19
41:19,21 46:2,19	assistance 25:13	Aviva 97:20	35:15,24 36:12	43:19 69:9 97:22
62:14	77:7	avoid 58:25	barriers 129:14	124:22 134:1
articles 36:1 38:16	assisted 120:11	aware 5:19 17:6	Barrington 135:9	believed 15:21 57:6
43:1,5 44:5 46:22	associated 60:1	27:21 46:1 81:9	135:12,12,13	57:10 58:3 70:8
46:25 52:4	136:20	81:11,16,18 86:18	137:7	86:25
artificial 89:17	associates 95:24	88:10 92:23 95:14	barristers 129:10	belong 107:10
aside 84:18 94:4	96:2 143:13	95:16,20 97:25	Barron's 7:5	belonged 107:19
asked 1:9,18 18:20	assume 15:4 112:18	98:6 99:2 101:14	Barton 59:13 62:19	133:22
19:1 40:12,13	ate 60:1	103:3 132:1 143:9	62:21	belonging 106:8
42:13 57:2,4,10	attack 154:21	145:6 147:15	based 13:2 18:22	benefit 2:13,15
58:8 59:12,17	attacked 88:25	150:16 154:7	40:15 41:7 82:16	34:11 85:9
60:8 63:2,9 64:12	attempt 16:19	155:21	84:7,15 92:18,23	bereavement
67:3 73:12 83:22	86:25 88:4 90:3	awareness 97:17	95:2,7,11 103:20	108:16
104:15 106:20,21	attend 25:13 76:16	awful 48:22 77:12	124:23 146:10,13	best 16:17 29:8
107:21 126:22	81:21,22 86:2,4,7		146:13	63:7 67:21 72:15
134:13 137:5,25	attendance 63:10	B	basically 39:14	78:17 114:2
142:20 147:2	64:2,7,11	b 102:13 103:9	45:25 92:1	124:20 136:12
149:20 152:10	attended 26:7	back 1:4,23 9:4,5	basis 1:13 48:17	better 4:24 13:4
asking 2:4 5:15	82:17	25:20 31:7 38:5	57:17 58:2 62:5	20:25 22:3 42:3,9
12:16 78:20	attendees 86:11	42:1 47:1 50:14	99:13,15 141:5	146:1
139:19 142:21	attending 64:1	51:2 73:21 74:16	142:19	Beyeler 65:25
aspect 23:15 39:10	138:14	74:17 77:13 83:4	Bastrykin 56:23	beyond 77:14 83:22
53:7 137:3 155:15	attention 53:8	87:9,14 89:6 98:8	Bear 75:10	100:1 123:3
aspects 37:15 38:13	105:13 143:15	105:23 106:1,4,9	Beggs 2:2,3 8:4	124:16 128:10,14
97:3 101:16	145:8 148:12	106:16,17,21,21	12:16 18:7,16	128:17 149:4
103:15 139:11	Attorney 65:25	108:14 109:12,14	19:15,21 20:4,6	154:8
assassin 5:23 86:23	attributable 107:5	119:22 123:19	26:22 33:7,24	bias 22:10 23:12,14
assassinated 38:19	attributed 57:7	125:6 126:23	34:3,9,13 35:22	28:22 29:23
assassination 19:4	attribution 26:23	128:20 130:14	38:18 39:23 40:23	big 87:8,8,9,11,12
assault 81:15	Audio 159:13	132:15 133:6	40:25 44:18 45:19	87:18 109:15
154:12,21	August 19:11 50:17	136:5,6 137:6	45:22 48:20 57:5	118:15 133:1
assess 5:9 72:16	78:10	138:22 139:21	58:8 59:7 160:6	135:1
96:19 109:7	authorising 141:14	142:23	beginning 40:2	biggest 34:21 61:16
assessed 99:13	authoritarian	background 11:15	58:4 60:3 148:21	billion 35:5

billionaire 33:3	brief 1:8	101:5 109:12,13	107:4,9 108:22	CCTV 83:15,19
billions 35:25	briefly 55:14 60:25	109:14	145:2,5,9	130:10
Bishop 86:9	65:10,20 67:21	bundles 100:25	cardholder 61:3	cent 29:9
bit 15:2 30:17	68:5	Burden 85:5	cards 60:15	central 14:7
33:24 34:8 87:13	bright 151:13	business 2:23 14:22	career 31:8	centre 96:5
97:7 105:9 115:20	Brighton 80:2	15:14 24:17 31:8	careful 28:6 33:24	CEO 36:3
126:11 136:11	Bristol 61:9,17,24	63:20 64:1,5	34:8 97:10	certain 8:23 55:8
138:9 148:18	62:9,15 144:24	95:24 96:2,7	carefully 44:23	156:7
black 120:18,19	Brit 147:23	134:8,18 135:19	69:15	certainly 19:20
blame 55:9	British 24:25 58:12	135:25 136:24	carried 105:7	38:5,15,18 60:18
blew 28:16	140:17	144:14	carry 133:18	62:15 77:4,21
blind 33:1	broad 67:5	businesses 95:20,21	cartels 30:1	83:5 95:9 96:3,11
blockade 41:7,12	broke 122:15	96:4	case 11:17 12:3,15	109:9 121:13
blocked 125:18	broken 65:8	businessman 24:23	13:15 14:12 23:4	139:17 157:5
blogs 32:13 37:25	brought 143:15	30:22	23:10,13 24:3,4	cetera 52:4
42:4	145:8 148:11	businessmen 24:14	29:2,6 31:3 38:9	challenge 36:12
blood 156:4	Browder 1:3 2:3	24:15,21,25	38:14,15,17,22	challenges 36:13
bloodcurdling 11:1	6:15 8:6 12:3	bystanders 81:3	39:19,20 43:9,18	chance 44:22
blow 30:12	18:17 19:21 29:18	157:14	52:3 54:17,21	129:11
blowing 28:25	29:22 33:19 35:10	C	55:7 58:23 65:9	change 32:2 36:6
blurred 72:1	39:23 43:10 44:18	call 11:6 76:13	68:10,16 71:8	36:10 37:7 92:22
board 34:22	47:8 49:5 50:2	90:15,15 91:7	74:21 75:20 77:6	changed 32:4
bodies 154:22	55:1 57:2 58:9	102:21 130:22	92:25 93:5,12,19	changing 151:18
body 56:15 81:9	63:3 65:1,23 68:1	145:24 152:5	95:1 96:21,23	channel 138:22
82:23 84:18 106:6	70:22 75:11 76:21	called 40:17,19,19	99:18 103:19	139:21
Bombarash 21:7	89:25 96:11 160:5	40:19 41:14 81:16	124:18 125:19	character 141:3
bone 146:24	Brown 8:18 9:12	82:14 85:9 100:23	130:17 140:25	characterise 18:25
book 37:3 53:20	10:2 12:18 40:9	calling 109:13	141:17 145:21	129:24 131:7
58:13,13 147:12	68:1 82:7 84:23	cameras 130:10	149:14	characters 26:24
booked 59:14 62:7	85:18	campaign 7:4 30:8	case-by-case 99:13	chase 45:19 46:23
62:10,15 145:1,7	Browne 33:25	37:19 38:13,14,15	99:15	chauffeur 143:17
145:12	76:19,22,25 77:3	39:4,5 44:9 45:24	cases 79:20	143:21 144:4
bottle 120:7	77:15 130:3,4	47:10 63:21	cash 3:14	chauffeurs 143:18
bottom 119:24	131:16 160:13	campaigner 47:18	casual 18:5	cheap 61:25
121:2,3	build 39:24	48:9,10	catch 124:24	cheaper 61:24
box 62:25	bullet 148:8	Canada 56:20	cause 4:17 37:12	Chechen 38:22
breadwinner 15:6	bulleted 148:21	capable 4:4	54:2 93:6 140:20	check 7:11 38:12
break 41:12 76:20	bundle 8:20 10:6,8	capacity 54:12	140:22 141:18,24	44:15 81:11,12,13
77:3,17,20 97:7	50:3,6,7,8 60:18	76:12	142:14,21,22	checked 81:9
157:4	60:24 65:11,13,14	Capital 2:5 150:9	154:8,17 155:2	checks 84:17
breaking 97:6	65:15,16,17,17	150:11,15,19	caused 33:16 36:3	Chersakov 86:8
breathing 23:4,9	67:22 85:8,9	car 4:7 114:12	36:5,9 60:7 133:8	chief 68:2 78:24
bribe 24:22	86:15 87:8,10	115:3 126:6	causes 68:14	79:11,16,17,21,22
bribery 24:5,6 25:5	90:20,21,22	card 60:20 61:3	causing 24:2	80:1,5 84:22
96:20	100:23,24 101:1,4		cavalier 151:10	85:18 146:22

child 80:3	120:21,25 121:21	commercial 36:13	18:14,24 19:1,8	47:25 48:7
children 11:4,21	122:13,15,25	36:18	73:18 129:25	conduct 82:9,10
15:6,10,16 16:17	123:17 127:3	commitment 15:15	compromise	93:8 136:24
44:11 48:15	131:22,24 132:2,4	committed 3:1	139:22	141:22 151:17
chime 74:15	132:6,9,16 158:19	common 7:21	computer 109:8	155:14
choose 18:25 19:7	closed 24:4	96:12 131:6	111:12,13 133:22	conducted 80:25
chose 19:5,8 67:16	closer 122:23	commonplace	134:2,3,11,13,14	89:7 94:22 105:19
chosen 17:2 72:23	127:10	24:14,18	135:15,16,18	111:25 135:6
CID 81:1	cloudy 115:20	communicate	136:8,22 137:5,13	143:7
circle 52:15	co-conspirators	100:21	157:12	conducting 108:7
circularity 47:3	138:19	communicating	computerised 91:3	155:13
circulated 57:22	collaborator 56:19	110:2	computers 96:18	confident 55:19
circumstances	collapse 157:12	communication	concede 26:4,7	confidential 4:11
82:14 98:10 99:18	collaterally 44:10	91:4 100:19	conceding 43:22	4:12
citing 12:5	colleague 90:24	102:20 104:3	concern 68:8,10	confirm 9:25 38:5
City 11:10 12:13	colleagues 4:10,17	139:15	86:10 93:7 98:23	49:20 124:19
civilian 81:3	16:2,5 46:4 47:24	communications	102:15 104:1	136:6
claim 6:7 63:22	48:5 52:8 59:5	110:3 136:1	108:11 118:5	confirmation 22:9
claims 6:5	collision 81:14	145:21	143:10	23:14 28:22
clarification 76:4	Collwood 81:19,24	communism 32:2	concerned 16:16	142:10
89:21 159:9	colour 117:9	community 114:18	72:3 73:2 87:4	confirmatory 22:10
clarify 77:16 105:8	119:18 120:12,17	companies 3:7,13	91:13,17,18 102:7	23:12
110:16 146:16	coloured 116:18	7:25 95:10,19,23	102:14 104:8,9,12	confirmed 81:23
clarifying 80:16	come 1:22 6:12	company 2:7,13,15	130:14 150:21	97:23
Clark 137:7	25:20 31:3 42:9	2:16 8:11 35:4,5	concerns 68:25	confirming 38:8
Clark-O'Connell	51:17 54:19 72:11	69:24 98:24 130:7	90:17 91:10 92:5	confirms 22:15
134:22,23 135:11	77:13 84:22 87:15	company's 5:17	92:7,8 93:23	confrontation 27:8
classified 81:22	114:20 115:5	compare 88:23	94:12 101:24	152:6,15,16,19
clear 4:17 6:10,17	120:24 123:19	107:14	103:10 104:4	153:4,5,7,23
6:18,19 16:23	156:15	comparison 30:2,3	148:9,11 153:15	confused 6:4,5,15
22:2 31:21 41:6	comedy 118:6,8	complaint 65:2	154:7,9	6:16
58:13 68:7 69:23	comes 7:2 18:11	complete 103:3	concession 32:19	confusion 104:8
132:5 140:23	62:6 75:18,19	105:6	conclude 158:20	connected 5:7 56:5
149:8	comfortable 73:13	completely 32:14	concludes 157:24	95:19
clearly 71:3 73:9	coming 1:4 73:18	35:18	conclusion 43:14	connection 73:11
89:6 115:8 141:10	77:3	completeness 56:14	81:6 111:22	conscious 113:2
147:5	commander 80:6	59:7 60:8,19	135:23 138:5,21	156:11
clerical 14:4,7	commencement	66:21	140:6 145:17	consequences
client 1:7,8,13,17	43:15	complex 4:11	149:22 150:2	18:10
45:7 46:12 62:25	comment 34:1,2	complexion 117:19	151:7 155:17	consider 1:21 43:16
69:4	103:20 104:11	133:4	conclusions 80:14	76:19 84:19 108:8
clients 88:3	118:5 134:9 136:9	complexities 152:8	89:9 139:16 151:4	108:11 129:4,8,9
clip 44:19	commented 117:23	complicated 72:22	153:6 155:19	156:23
close 2:25 4:10	comments 102:24	87:13	conditions 15:14	consideration
28:16 114:9,12,16	103:24 149:1,2	compound 18:4,6	condolences 47:22	16:20 137:2

140:11 153:21 considered 80:12 considering 138:6 consign 24:24 consist 25:12 consistently 44:6 conspiracy 18:18 18:19 48:16 conspirators 138:17 constable 68:2 79:6 79:10 84:22 85:19 consummation 25:4 contact 48:1,2 69:18,21,24 140:16 143:9 145:15,17,20 146:3 153:17 contacted 84:23 90:10 92:6 147:18 149:12 contacting 93:3 110:11 contacts 110:1,6,16 136:18 139:6,7,8 140:18 157:19 contain 107:7 contained 82:5 107:15 containing 135:19 contemporaneous 8:1 17:21,25 21:20 22:21 23:2 65:7 67:8 contemporaneou... 18:23 content 16:18 111:15 156:22 contents 107:12 109:8 114:2 155:22,24 156:1 context 6:4 9:24 16:21 21:25 23:8 78:9 91:11 102:11	103:25 104:23 105:11 108:15 111:6 112:25 139:12 contextual 21:13 contextualise 23:2 continue 46:9 92:19 continued 1:3 14:22 33:19 66:25 83:8 133:19,20 160:5,15,16 continues 1:7 contrary 17:15 25:24 84:21 contribution 7:4 control 43:8 85:3 137:16,22 controlled 147:2 controversial 159:3 converge 127:20 conversation 101:17,19 102:4 103:9,12 105:12 126:1 145:23 146:1 conversations 21:12,14,18,20 22:5,17,24 158:15 conversion 35:16 converted 85:14 cooperate 153:14 cooperated 153:16 cooperating 40:11 coordinated 146:12 copies 67:21 copy 57:15,23 59:23 121:13 cordon 125:9 core 53:21 coroner 1:4,24 3:11 6:11,25 8:3,20 11:9 12:5,12 13:22 16:14 18:1 18:8,20 19:20,24	20:5 22:4,9 23:7 23:21 26:11,17,21 27:17 33:7,23 34:5,10 35:21 38:10 39:13,23 40:24 41:2,5 42:13 43:11 44:15 44:16 45:14,16,20 47:4,11 48:18,22 49:7,17,25 50:15 53:1,13,18 54:6 55:2,4,12,22 57:14 59:22 60:4 60:9,9,10,23 61:16,19,21 62:4 62:12,20,23 63:1 65:22 66:3,13,15 67:20 68:24 69:13 69:16 70:19 71:4 71:14 75:13 76:5 76:21,23 77:2,10 77:18,21 78:5 85:7 87:14,19,21 97:6 101:2 113:3 113:7,11,21 128:6 133:14 138:8,11 148:15,18 157:5 158:3,8,23 159:4 159:7,10,16 coroner's 10:2 34:22 47:1 52:23 53:8 85:6 106:6 coronial 84:5 154:5 correct 4:1,6,9 5:24 9:19,23 10:23 14:14,25 16:6 17:13,14 22:1,6 25:6,18 26:16,20 27:9 28:11,18 30:16 31:16,23 32:24 33:4,6 36:23 37:1 49:14 49:18,21 51:19,24 52:9,13 53:6,17 54:8 55:17,20	56:17 59:1,16 60:16 63:13,16,19 63:25 64:24 66:2 66:12 67:2,14,19 69:7 71:6,11,20 71:23 72:2,5 73:24 74:23,25 75:4 80:17,18 81:8 84:24 90:12 100:6,10,13 105:22,25 106:13 114:10,13,14,25 115:3,4,7 117:2 117:25 119:8 123:18 124:5,17 124:19 125:2,8,11 126:6,8 127:16 128:18 129:16,18 130:19,21,25 131:23 132:10,12 134:5 144:25 146:22 149:3 152:7 corrected 11:9 20:3 152:20 correcting 19:9 correctly 122:13 correspond 17:5 correspondence 44:19 68:5 69:8 144:15 corruption 15:2 68:16 cost 3:14 counsel 1:9 3:11 11:9 20:25 49:6 50:15 52:23 57:15 71:14 counted 38:2,4 country 8:23 15:23 110:14 couple 7:15 course 5:1 7:23 15:25 22:19 27:24 37:21 42:16 44:12	53:2 58:4 72:17 76:5 82:8 89:11 92:22 93:4,7,23 97:18 140:24 155:1 157:13 court 8:14 17:15 20:17,22 31:3 32:11 35:11 39:22 47:2,13 53:3 54:14,21,23 59:10 70:13 95:9 98:15 99:17 113:19 158:20,21 159:13 courted 37:4 courts 20:17 37:11 cover 54:16 covered 102:25 covering 58:21 CPS 142:18 crashed 58:18 crashes 4:7 create 32:4 46:15 created 46:15,17,19 creating 24:2 46:13 credible 16:24 credit 29:7 43:4 60:14,20 66:16 145:2,4,9 crest 114:23 115:2 116:1 121:16 122:19,25 123:5 127:4 Crillon 61:10,18 crime 2:20,22,24 3:9 11:13 12:14 24:16 40:12 50:25 54:17 68:17 72:13 78:25 79:6 80:9 81:21 82:17 138:16 140:15 criminal 5:8 11:12 13:3 15:1 24:3,4 25:8 27:15 52:3 55:9 58:23 65:9 94:15,17 138:20
---	---	--	--	--

139:20 criminals 4:3 71:25 criteria 142:17 critical 8:1 criticise 108:18 crossed 73:25 Crown 141:12 142:7 crucial 66:22 cruder 35:13 crystallisation 25:4 culture 15:1 24:17 curiosity 112:9,14 cut 45:19 46:23	DCI 42:22 81:19,24 de 3:10 deadline 158:19 deal 7:20 49:6 71:12 76:4 105:16 123:20 126:23 153:25 dealing 12:7 23:22 27:10 85:6 108:4 159:1 dealings 63:21,21 69:25 dealt 33:14 death 3:4 11:11,14 13:25 37:18,22 40:13 41:17 46:20 51:13 66:25 67:15 68:13 69:3,4,6 74:8,10 80:15 81:20 82:2,10,15 83:20,25 84:7,19 88:1,8 90:18 92:16 98:3 99:4 105:1,21 106:2,11 106:18 108:4 109:2,4,10 140:21 140:22 141:25 142:14,22 150:17 152:14 154:8,17 155:2 deaths 54:3 55:3 79:1,2 81:22 deceased 1:11 91:18 December 45:1,10 69:10,14 91:25 92:24 110:24 123:22 146:11 147:12 148:3 155:11 decent 24:15,15,21 24:22 decided 125:22 decision 39:22 81:19 137:18	146:6,10 declares 150:13 deduce 117:4 deem 87:4 deep 28:9 defend 33:19 34:15 defended 33:9,12 defied 25:21 definitely 84:6 115:19 definition 155:23 degree 88:14 153:12,22 delayed 38:25 deletion 39:17 deliberately 13:17 delicate 108:3,17 delivered 142:2 demand 58:20 demonstrate 14:3 depended 83:11 depends 139:10 140:3 deputy 79:19 146:23 describe 35:15 50:13 114:11 115:1,15 116:15 117:16 118:19 119:22 127:25 described 3:18 20:9 32:11 36:17 51:10 67:4 70:7,14 116:22 122:6 126:14 127:2 describing 102:5,5 117:17,18,20 131:14 133:10 description 116:25 126:24 127:25 128:7 design 53:11 designed 53:16 despite 11:21,21 26:9 66:25	detail 8:22 31:5 53:13 69:17 89:16 102:23 105:16 119:14,16 131:14 143:20 detailed 8:19 9:17 59:23 66:5 68:25 82:11 93:9 details 38:23 95:19 96:1 107:24 119:19 137:16 149:14 detect 156:12 detective 23:8 77:25 78:4,23 79:5,10,16,17,20 80:1,5 84:15 85:4 85:5 detectives 81:10 86:7 deter 93:3 determine 82:25 93:5,16 155:2 determined 82:8,15 84:7 85:6 89:12 141:9 142:3 determining 152:10 development 38:22 device 107:6 devise 10:20 DHL 50:24 51:1 die 46:5 54:25 died 40:5 46:1 48:6 52:2 104:5,21 150:16 152:16 dies 41:24 99:9 153:11 differed 153:1 difference 138:24 different 5:16 39:7 39:7,8,9 61:1,13 62:11,16 68:24 72:19 74:21,24 79:10 93:11,11	135:18 difficult 82:22 104:10,14 108:3 139:15 140:12 difficulties 24:25 29:3 dim 35:2 dimmed 33:19 dint 15:3 direct 19:16 93:25 directed 112:3 direction 115:5 126:5,15,16 127:18 directly 51:10 104:19 148:2 151:21 disagree 44:8 48:20 disciplined 146:12 disclose 46:9,10 disclosing 39:22 discover 3:20 discovered 67:15 94:25 95:1 101:25 discreet 143:23 discretion 37:13 discuss 102:23 144:14 146:25 discussed 101:13 111:9,10 156:5 discussing 16:14 54:16 103:18 125:20 146:17 discussion 147:1 discussions 23:16 75:14,17 101:24 102:4 155:9 158:17 disingenuous 43:10 dispute 138:18 disregarded 13:9 dissident 43:7 distance 127:16 distinct 93:18 distinction 24:20
D				
D 160:3 damaged 44:10 damascene 35:16 danger 5:9 73:10 dangers 73:19 dark 115:12,17,18 116:22 darkness 51:17 date 70:23 74:10 111:3,13 152:18 153:4 159:5 dated 9:13 44:13 45:1 65:23 68:2 69:14 78:14 91:24 101:9 110:24 113:23 135:21 136:10 137:12 dates 9:4,5 70:1 day 45:9 51:16 54:13 64:10 101:10 114:6 115:1,8,20 131:15 132:4 158:21 days 42:24 45:8,25 46:1,1 51:20,25 77:11 105:6 DC 85:5 109:18 112:8 123:21 145:16				

distinctly 93:11	151:4 153:6	103:23 129:2	England 18:12	eventually 16:18
distorted 13:17	draws 135:23	137:20 141:10	28:9 146:24	65:2 102:21
distressed 27:12	Drinkwater 90:9	149:20	English 16:19	140:24 145:16
district 80:6,6	90:16	Ekaterina 134:23	147:25	evidence 1:17,20
divide 101:16	Drinkwater's 91:3	elaborate 103:22	enjoyed 36:19	3:22 4:14,16 6:6
divider 10:8	driven 114:12	149:5	enquiries 94:22	8:7,14 9:8 13:18
division 80:2	driving 114:15	electricity 36:5	96:14	16:14,16,23 17:2
document 65:3	115:24	electronic 145:21	ensure 109:2	17:4,14,15,19,23
71:3 85:17	drop 124:5	Elias 113:16,17,20	entered 85:17	18:20,21,22 19:16
documentation	drove 115:14 116:8	113:21 129:10	enthusiasm 18:17	19:21 20:8,20,25
58:1 64:19 65:4	122:24 132:4	130:4 131:20	18:19	21:2,13 22:3,20
66:5 67:24	DS 78:2 90:9,16	133:16 160:11	entire 36:11	23:17 24:6,8,10
documented 16:23	91:3 133:19	elicited 7:15 9:20	entirely 25:19	24:11 25:3,14,19
documenting 39:15	136:12 160:9,15	eliminate 156:6	67:12 155:22	26:5,8,14 27:6,7
documents 51:2,6	due 43:4	email 20:16,18,19	entirety 39:14	29:23 30:17 40:14
58:16 65:6 66:16	dusk 115:19	21:22 46:8 69:24	89:10	43:18 47:5,13
66:19 70:14		71:19 74:21 91:24	entrances 129:15	48:17 49:7,11,13
135:19,21 136:3	E	146:3 149:4	entries 61:1,5,8	53:4,7,9,13 54:7
dog 130:16 131:4,9	E 160:3	emailed 145:25	entry 61:8,9,10	54:12,14,23 55:1
doing 5:9 8:15 12:3	earlier 10:1 28:5	emails 20:14,17	74:12 136:9,17,20	55:5,6,7,7 57:13
19:10 22:16 26:2	31:17 84:2 97:7	21:5 54:14,19,20	147:11	59:9,17 60:20
36:19 42:23 44:6	106:10 108:14	135:19,21 136:1,2	equally 96:14	62:8,10,19 63:7
56:21 61:21 73:13	126:3 137:22	emerged 25:25	error 14:4,7	66:24 68:21 71:7
83:1 93:21 118:7	138:1 139:2	emerging 11:7	establish 92:20	71:8 74:20 80:11
128:6 141:12	early 71:3 77:16	employee 12:25	93:10,14	81:2,15,24 83:20
dollars 29:14 35:25	earned 30:22	70:20,23 72:18	established 140:20	84:16 93:10,15,25
domain 20:15	earphones 119:12	76:12,14 89:22	141:24 150:18	95:9,10 97:9
doorstepped 104:5	ears 119:13	110:19	establishing 93:12	98:16 103:2,3
dossier 5:22 9:3,9	easily 20:4 56:3	employees 52:12	estate 37:6 83:16	104:2 107:18
12:21 21:4 70:4	East 25:1	150:14	114:9 129:12,15	113:7 134:11
dotted 130:10	easy 71:22	empty 121:18,24,25	129:19,21 130:9	140:7,9,23,25
doubt 1:17 12:4	eating 23:4,9	122:16,20 123:4,9	et 52:4	141:5,25 145:6,11
26:8 46:12 56:6	educated 151:14	127:7	ether 16:7	146:7 151:21,25
66:23 74:11	education 15:9	en 9:22	Eugene 113:17,20	154:11,20 155:18
download 111:12	effect 10:13,22	encourage 92:14	160:11	157:13 158:1
136:16	17:16 23:19 26:15	encouragement	Europe 144:3	evidential 57:17
downloaded 7:11	41:16 45:22 147:7	92:15	European 56:21	evidentially 28:14
7:12 136:3	effective 10:20	enduring 11:7	evasion 58:23	exactly 25:16 30:3
Dr 65:25 146:24	effectively 3:8 24:2	Enemy 36:25	evening 61:7	61:11 62:13
154:4,11,16	35:4 43:21 44:25	energy 3:5 36:4,7	118:25 119:5	103:13 111:4
155:21 156:2	50:19 98:21	enforcement 10:19	125:7	116:5 123:5
draw 53:7 104:11	efforts 102:18	11:8 54:15 56:24	event 13:17 16:12	exaggerated 13:17
104:14 108:19	either 13:7,14	94:21	events 6:7 22:22	67:11
138:5 139:15	21:25 37:9 41:2,7	engaged 51:11	47:1 73:6 80:21	exaggerating 13:11
149:22 150:2	55:3 56:4 62:19	139:20,21	80:24	examination 82:23

134:4,5 135:6 137:25 146:14 157:24 examinations 89:11 96:15 109:21 139:18 examine 47:9 109:6 147:14 examined 95:5 107:1 111:1,12,17 134:8 example 13:24 33:12 60:4 62:10 69:23 75:22 84:4 93:2 112:6 119:19 131:4 132:14 140:22 145:23 examples 4:7 49:19 55:2 exceptionally 8:19 15:10 144:8 exchange 58:5 exclude 156:6 excluded 38:16 81:14 excluding 147:13 excuse 61:18 executions 4:5 executives 11:2 exercise 110:10 130:24 131:5 exerting 132:23 exhausted 115:13 exhaustion 133:3 exhibit 107:1 exist 53:15 existence 5:21 expected 134:10,16 expelled 14:23 34:24 expensive 48:3 129:22 experience 15:3,14 24:19 75:24 79:1 84:15	experimental 53:15 experimenting 53:22 expert 11:18 21:13 146:12,24,25,25 153:24,25 155:16 expertise 11:21 experts 146:11,16 155:9,12 156:13 156:17,18 157:1 experts' 156:6 explain 19:10 104:22 108:23 109:25 explained 3:25 48:24 82:16 87:25 94:5 107:22 108:13,13 137:22 138:1 142:7 149:11 explaining 49:1 56:9 explicitly 69:2 explore 102:10 explored 140:4 explosive 3:21,22 4:14 26:5 explosively 3:19 exposed 7:22 35:25 36:3,8 exposing 2:19,21 2:23 35:24 40:11 47:5 expression 117:6 expressions 86:10 expropriating 35:4 extend 47:22,25 extended 48:6 83:14 extensive 94:20 extensively 143:25 extent 1:10 33:8 95:21 external 51:11 extortion 24:22	86:25 88:4 90:3 extract 135:8 extracted 135:10 extraction 135:9 extracts 53:20 55:22 158:15 extraditions 52:4 extreme 43:5 eye 33:1 115:10 126:9 <hr/> F <hr/> face 25:7 92:3,6 102:12 115:14 117:9,12,14,16 132:19,21 facial 117:6 facie 92:25 93:5,12 fact 6:2,12 16:16 18:18 24:6 25:10 28:3,4 40:10 50:14 53:21 55:19 67:8 69:2,3,5 71:18 73:10 74:16 74:17 77:17 82:9 86:21 92:11 97:7 98:13 99:8 103:16 103:19 104:20 105:3 110:3 124:23 131:1 148:3 151:5 152:23 153:9,11 153:16 factor 133:8 factors 153:21 factory 53:14 facts 6:16 7:14 17:5 23:5 40:21 fair 22:4 26:11 37:23 62:24 64:18 71:17 95:22 118:17,18 127:17 131:1 fairly 9:7 68:5 94:19 105:1	115:13 116:9,11 144:11 fairness 1:19 19:15 faith 157:2 fake 50:24 62:16 fall 32:2 54:25 fallen 16:2 false 111:3,11 familiar 50:16 57:18 families 52:16 family 11:3 12:25 15:5 52:14 54:9 100:4 102:17 103:1 134:11 135:17 136:22 143:6 far 33:22 59:22 73:19 80:21 87:14 116:2 122:10 123:11,13 127:13 130:13 143:9 145:6 154:7 fatal 146:20 favour 22:14 23:21 30:8 fear 19:4,23 88:20 fearful 73:15,16 fears 70:15 feasible 140:17 Federation 70:15 feed 38:17 feel 19:14 95:6 feet 116:4,4,5 Fegan-Earl 154:16 156:2 fell 54:11,24 felt 15:19 90:18 105:11 109:4,11 146:2 149:7 fence 10:16 field 136:19 Fight 36:22 figure 29:11 127:15 figures 61:16 98:8	file 42:24 46:9 60:5 60:6 files 135:19 158:21 film 51:22 final 75:11 148:1 finally 6:1 55:11 69:8 70:19 71:12 129:10 Finance 36:22 financial 66:17 94:22,25 95:18 96:13 143:6 157:18 158:16 financier 72:12 find 23:21 39:17 86:14 87:7 90:24 94:5 96:9 100:23 109:16 110:7 111:2 134:8 144:9 154:16 finding 50:5 112:24 137:8,10 findings 53:4 109:21 157:3 finds 30:7 110:23 fine 119:17 158:7 158:24 finish 12:16 18:8 35:21 38:10 39:13 42:13 122:24 158:4 finished 76:21 fired 36:3 fires 4:7 Firestone 63:14 firm 40:8 68:24 first 9:25 11:25 35:7 45:11 46:2 46:19 49:5,8 56:2 63:14 71:17 72:3 72:8 78:9 81:2 86:15 93:7,9,14 101:17 103:16 104:25 105:17 109:25 118:20
---	---	--	--	---

122:23 123:8	foreigner 32:15	94:8,10 106:20	game 48:12	63:7 64:16 103:2
141:21 142:13,14	foremost 104:25	138:17	gangs 15:2	glasnost 31:12
142:18 145:24	forensic 83:12 84:4	fraudulent 36:8	gangsters 50:25	go 9:4 38:5 41:10
148:7 155:25	84:6,9 93:8 100:2	free 35:4	Gardens 155:14	42:1 64:8 69:13
156:4 158:10	135:6 136:16	freely 89:7,7 144:3	gates 18:15	75:19 77:14 87:15
fishing 147:9	146:7,25 154:13	French 59:24,24	Gazprom 36:1,2,3	92:7 93:24 112:16
fit 26:18	154:23	60:4,6,9,11 61:18	general 65:25	114:23 125:22
fitness 118:12,14	forgive 67:10 69:21	frequent 144:10	97:22 99:6 102:4	141:14 148:18
five 6:7 8:15 22:24	74:8	frequently 47:18	130:6	Godfather 51:22
116:9 119:15	form 17:25 50:13	Friday 1:1	generally 22:13	goes 5:25 18:13
five-second 116:11	57:24 89:8 146:19	friend 1:6 59:12	55:1 73:19	36:20,21 74:9,10
flagged 69:5	157:20	friends 45:2,4	Gent 146:24	101:23 149:10
flagging 12:5	formal 10:19	143:13	gentleman 11:22	going 8:10 16:4,7
fled 15:20 58:25	formality 94:4	front 41:13 45:12	George's 19:3,6,22	18:2,3,15 21:21
flight 11:19 14:6	formally 80:17	50:9 60:5 78:11	114:9 120:16	22:7 29:1,22 31:7
144:1	formed 117:22	78:15 85:10	125:6 129:12	33:2 34:20 37:11
FLO 103:1,21	118:9,10 154:1	113:22	131:3	37:11 41:4 42:9
florid 8:12 43:2	forms 21:21 157:17	frustrating 102:19	getting 56:19,23	45:17 46:10,11
48:16	forth 15:2 37:25	full 1:21 21:25 31:5	125:21 133:2	50:14 54:12,13,20
FLOs 102:9 104:3	42:4 97:5 128:21	33:8 99:11 129:21	Gherson 4:22,23	54:23 55:22 68:21
104:16 105:8	130:14 133:6	fullest 131:14	5:2 90:10,16,17	73:24 80:10 83:16
108:12 137:2	156:7,25	fully 47:11	91:7,10,22,23	93:17 98:8 108:16
focus 49:8 80:10	forthcoming	function 53:21	92:4 100:8 101:11	109:3 113:8,16
138:19 142:3	108:12	functions 80:4	Gherson's 91:3	114:5,18 119:22
focused 109:3	forward 6:13 30:12	Fundamentally	give 5:10 6:1,6	122:14 123:7
focusing 39:9,10	69:13	32:24	17:21,23 18:20	125:16,17,23
82:13	foul 154:10,12	funded 7:25	21:12 22:20,25	126:23 127:20
follow 76:2 83:7	found 81:15 83:2,9	funds 27:14,19,19	25:14 27:6 29:7	132:7 137:6
102:7 107:17	84:16 89:8 96:15	30:25	30:17 40:20 41:1	138:22 140:8
121:3 137:14,17	104:1,2 111:17	funeral 106:7	43:4,17 45:17	142:11,23 153:10
138:10	112:10 137:23,24	further 1:18,20	49:12 54:12,14	156:22 158:4,18
followed 10:14	138:7 139:18	5:25 7:3 46:22	55:5,7 77:8 79:4	158:25
86:1 136:18 137:3	140:23,25 148:19	51:16,20,25 52:17	92:9 94:9 123:14	good 1:4,6 2:3 3:23
153:3	151:19 154:22	57:23 58:7 62:8	123:25 127:20	22:8 35:23 36:15
following 11:10	156:20	66:24 76:1,6 82:9	153:12 155:1	71:22 78:3 130:4
19:11 46:7,7	four 8:15 54:24	86:14 88:7 90:18	given 1:17 4:18	130:5,10 147:25
51:16 54:13	61:8,9,25 80:4	98:4 102:10 105:9	16:20 44:9 55:1	159:10,17
103:23 105:5	119:24	125:3 130:2	57:15 59:9 83:3	Google 112:10
122:18 147:12	fours 87:15	140:11 145:22	92:17 106:8 107:8	Gorokhov 54:7
follows 21:24	fourth 37:6	150:4,13 156:19	136:20 143:12	government 29:16
foolish 151:9	frankly 140:6	160:8	144:23 147:6	29:16 30:20 36:6
foot 60:25 70:3	142:12	future 153:22	158:13	36:9 39:7 72:1
force 79:16	fraud 32:10 35:25		gives 24:22 98:23	graciously 26:4,6
forced 13:25 108:1	36:2 51:6 66:6,8	G	giving 4:14 21:2	Granville 114:9,12
foreign 95:3	82:1 85:24 93:1	gains 27:20,22 28:7	23:6 49:11 55:5,7	114:15,16,21

120:21,24,25 121:3,8,21 122:25 127:3 131:22 grass 121:8 126:14 grateful 19:17 20:2 gravity 11:15 great 15:2,19 26:8 39:3 greater 15:3 43:4 83:6 grew 33:18 grimace 115:14 117:5,6,17,20 grimacing 117:1 118:17 133:2 gripping 120:3 grounds 95:7 group 2:20,22,24 3:9 11:14 13:3 50:25 54:17 55:9 69:8 70:19 138:17 140:15 guarded 18:3,6,14 18:24 19:1,8,13 73:18 129:25 guards 18:15 guess 122:7,8 guilty 28:7 guy 42:15 71:22 guys 71:22	108:22 handsets 107:1 108:21 happen 16:4 25:11 25:12 46:11 105:7 106:15 happened 25:11 41:9 56:9,22 83:15 100:19 105:18 141:11 147:5 happy 153:14 harassed 104:6 hard 146:6 harm 93:1 94:10 97:1 head 58:22 114:21 headed 67:23 heading 124:3,5 126:5 headline 41:21,22 headlines 43:13 Health 146:23 hear 33:5 66:23 113:16 heard 14:11 17:5 17:14 43:21 81:2 95:9 99:5 heart 154:8 Heathrow 61:4 70:11 heavily 7:7,11 held 63:4 107:2 146:10 hell 46:5 help 45:17 61:2 75:12 77:15,19 116:7 119:18 120:2 121:15 124:3,16 128:5 129:4,7,24 154:25 helpful 103:22 104:17 108:20 helps 58:1 Hermitage 2:5 5:2	11:2,8 49:9,12 50:18 51:9,11 71:10,15 82:1 84:23 86:1,6,11 86:14,22,24 88:10 88:22 89:22 91:12 91:16 92:25 93:20 94:8,13 131:20 141:2 150:9,11,14 150:18,21 157:16 Hermitage's 10:19 69:21 85:20 hiding 75:7 High 36:21 highly 7:24 11:18 56:2 147:4,8 hill 1:6 9:7 19:3,6 19:15,22,24 20:2 22:25 33:5 49:2,3 49:4,5 50:1 60:17 60:24 61:18,20,23 62:8,15,24 63:2 65:23 76:1 114:9 114:23,24 115:2,3 115:12,14 116:2 118:15 120:16 121:15 122:4,11 122:12,19 123:1 123:12 125:6 127:4 129:12 131:3 133:1,2 160:7 Hill's 20:20 hindered 156:9 hints 5:3 histology 154:25 historian 31:25 history 29:24 31:10 51:21 hit 7:7 11:23 43:2 70:4 90:2 hitman 9:2,9 12:21 38:22 Hold 28:6 holding 119:12	120:2 128:23,25 129:2 HOLMES 85:17 home 18:13 83:11 83:12 125:21 127:10 146:21 honest 25:19 123:7 149:19 hope 9:7,15 45:22 113:22 120:11 123:22 159:16 hopefully 10:12 hoping 40:25 43:11 horrible 40:3 hotel 59:15 60:11 61:9,10,18 62:9 62:11 144:24 145:1,7,12 146:15 147:14 hotels 59:13 61:13 62:7 Hounslow 61:4 hour 51:3 158:5 hours 56:15 house 83:13,13 114:11,18,21 122:16,23 123:9 125:17,22 house-to-house 83:6 housekeeping 76:20 houses 121:20 122:3,13,20 123:4 123:6 127:11 129:22 housing 121:19 Hove 80:2 HP 133:25 134:1 HSBC 29:24,25 huge 77:15 human 35:17 37:10 37:12 47:18 48:9 150:7 hundreds 36:1,1	37:24 hurdle 142:13,18 husband 30:20 46:6 101:18 102:13 104:8 husband's 96:2 hypodermic 154:21 hypothesis 23:23 hypothesise 139:19 hypothesises 22:16
I				
				Ian 78:2,3 133:19 160:9,15 idea 59:18 71:18 79:4 132:17 ideally 146:1 identified 4:16 55:18 109:11 140:20 141:24 identify 81:13 110:12 120:10 154:11,25 157:3 ill-gotten 27:20,22 28:7 illegal 30:25 illustrated 13:24 imagine 37:16 152:12 immediate 52:14 immediately 92:5 immense 8:22 immensely 9:17 immune 32:15 impact 43:17 impartial 26:22 28:23 30:6 43:18 importance 14:8 important 9:21 68:15 105:17 111:18 153:8 impossible 64:9 impression 62:12 104:7 117:22 118:9,11 135:16
H				
hair 115:12 116:22 half 9:2,15 51:3 122:2,3 158:5 hand 66:14 107:23 118:19 119:12 128:24,25 149:21 handed 44:13 105:23 106:1,4,16 106:17 hands 16:8 133:6 handset 107:2,5,8 107:11,15,18,21 107:23 108:10,14				

imprisoned 33:13	99:16 140:13	injection 154:21	intentional 41:7	intrusion 104:12
in-house 76:13,15	143:19 151:13	injuries 55:3	interactions 39:9	investigate 40:12
inaccurate 35:18	individuals 55:8	injury 81:13 82:24	interest 43:6,8	42:14,16 46:16
35:20,23	142:9,11	inkling 35:7	141:19 143:1	60:7 138:25
inadvertently 29:3	industry 64:5	inquest 2:14 38:24	interested 48:10	investigated 79:2
inappropriate	inexorably 21:24	39:25 78:9 159:20	57:23 158:1	96:19 106:13
72:25	infer 31:1,5 131:1	inquiries 82:10	interesting 24:24	139:25 140:18
Inaudible 124:13	inference 31:2	84:1 94:14,20	52:3	154:9
131:11	104:10,11,14	95:25 108:7	interests 14:22	investigating 79:1
incepted 98:2	inferentially 25:24	141:23 142:9	interior 70:7 88:11	79:18,19 80:13
incident 50:14,17	influence 39:25	148:6 155:19	interjection 6:11	82:18 99:3 104:24
54:11	42:5,17,18,19,20	inquiry 12:14 53:5	intermediary	143:5
include 24:14 84:4	146:9	53:10 83:18 85:7	138:15 140:14	investigation 11:12
included 146:22	influenced 43:19	86:5 89:3 91:15	internal 50:11	41:9,17 42:7,17
155:6	43:22	92:2,12 93:16	52:24 87:13	42:22 43:14 66:25
includes 5:20 9:17	inform 98:9 99:12	94:2,11 106:6	109:15	78:21,22,23 79:15
37:10 66:4	146:6 154:25	136:25 140:4,8	international 95:4	80:12,25 82:3,19
including 11:4,20	informant 68:9	141:7,20,21	110:13 141:13	83:23 85:1,24
72:7 84:17 157:14	information 4:19	151:19	142:8	90:19 91:12 93:21
157:15	22:14 46:9 47:5	inside 51:5 125:22	internationally	97:18 99:12 102:8
incongruities 8:8	55:12 66:22 68:11	inspector 78:24	68:15	108:25 111:7
8:10	68:15,18 82:5,7	79:11,11,17,20,21	interpose 113:8	138:20,23 139:9
incongruity 11:18	82:16 84:3,8,18	79:22 80:1,5	interpret 22:14	139:11 141:4,8
11:23 12:7 13:6	84:20 89:3 91:25	instance 48:8	86:20 137:20	142:4,12,25 148:6
17:7	92:2,9,12 93:20	instant 112:17	149:18	150:25 153:15
inconvenience 26:8	94:15,17 96:24	instigate 143:16	interpretation	154:2 157:11,18
incorrect 27:21	97:2 98:24 99:11	instruct 12:18	21:13 22:4,20	investigations 79:8
increase 25:9	101:14 102:18	instructed 157:1	23:1,3,7,16,22	79:9,12 80:3 84:1
incriminating	106:19 107:3,7,9	instructions 1:15	27:4,5 84:12 87:3	92:16 95:17 96:13
82:21	107:16 108:6	insurance 97:17,18	88:18 134:20	105:19 151:17
incumbent 49:16	109:7 125:24	97:19,21,24 98:12	151:8 152:12	153:24 154:1
indecent 24:21	135:20 143:12	98:14,20,24 99:10	interrogated 83:3	155:3 156:12
Independent 41:14	144:1,23 146:7	99:11,21,24 130:6	interrupt 9:8 40:23	157:14,17,18
41:19 46:2,18	147:19 150:9,23	130:6 158:17	interrupting 41:2	investigator 94:25
indicated 30:22	151:6,7	insurances 98:2	intervene 33:21	95:18
56:14 88:15	informed 40:4 88:2	integrity 25:23	intervened 34:4	investing 27:14,19
143:23	informs 159:5	26:2,7 27:11	interview 89:21	investors 2:9
indication 77:8	ingenu 151:10	28:25 29:2	91:22 141:15	inviting 155:14
96:22 146:5	initial 92:18	intelligence 12:17	interviewed 81:4	invoice 145:9
indicative 19:23	initially 102:20	14:5 15:15 80:4	89:23 151:24	involve 38:3
150:20	initiate 108:22	94:16,18,20	152:22,23	involved 2:13,16
indignities 48:16	141:4 146:14	157:18	interviews 37:25	28:19 38:3 39:6
indiscriminately	initiated 108:23	intelligent 14:12	intestine 156:3	39:18,21 72:13
44:4	154:13	intense 10:25	intimidated 88:19	80:16 88:18,21
individual 29:25	initiative 112:22	intention 58:21	introduce 4:20	92:25 93:13 96:7

138:23 139:23 141:1 142:6 143:2 147:16 150:17 151:15 involvement 78:21 80:19 81:25,25 85:23 94:7 106:20 141:4 150:21 154:10 involvements 84:25 involving 4:5 68:16 IP 1:14 iPad 119:12 iPhone 110:17 119:19 136:17 iPod 118:20 119:18 irresponsibly 44:4 isolation 89:18 140:13 issue 1:11,21 9:17 36:8 49:9 59:10 59:13 69:17 76:3 86:23 99:2 103:7 103:16 104:19 105:15 154:8 issued 37:24 38:8 issues 4:24,25 11:14 36:10 87:7 91:15,16 101:13 137:9 144:6 items 82:21	judgment 25:23 82:4 judgments 140:12 judicial 105:12 July 19:11 junction 121:2,6 122:5 127:3,13 June 1:1 57:16 111:14,20 137:12 138:2 159:6,21 junior 85:4 jurisdiction 110:4 justice 2:25 36:22 38:13,15 justified 108:9	83:20 95:3,8 110:25 150:14 152:3 know 6:24 12:6 14:15,16 15:5,7,9 15:18 18:5 19:5 19:18,24 20:13,24 20:25 21:9,10,20 21:24 22:10 23:5 27:13,17,24 28:2 28:10,13,17,18,18 29:12 31:6 41:2 44:1,5 47:24 48:22 51:13 59:7 60:17,22 61:11 62:1 64:14,25 68:13 72:8 73:2 83:1,7 84:8,16 95:22,23 96:3 97:9 99:19,20,21 101:21 103:12 104:11 113:11 115:11,20 123:8 125:19,21 126:10 130:12 132:14 139:14 142:2,11 144:14,15 145:11 145:13 147:10 149:18,25 151:5 151:12,20 152:8 153:5,20 154:1 156:2,5,8,14 158:9 knowing 29:21 31:5 73:1,3 99:19 102:14 125:17 127:3 150:23 151:2 knowledge 7:21 13:3 15:1,11 78:17 114:3 124:20 156:16 known 29:8 30:24 81:24 82:7 84:3 84:21 96:6 103:10	139:7 151:14 KOCG 10:22 72:8	136:15 leaked 20:14 54:14 54:19 learned 1:6 6:11 8:20 10:2 22:4,8 23:21 34:22 40:4 40:6,7 43:11 44:15 45:14 49:6 50:15 52:23 53:1 53:8,18 54:5 55:2 55:11,21 57:14 59:12,22 60:4 66:3,13,15 67:20 68:24 69:13,16 71:4,14 75:13 leave 47:3 54:5 62:23 leaving 59:4 84:18 94:4 114:11 led 36:2 83:2,6 155:9,19 left 16:2 18:9 58:10 73:22 74:7,16 115:23,24 left-hand 115:25 121:18 126:13 legal 39:7 57:16,24 63:17,22,23 97:21 99:6 130:6 142:17 152:8 153:3 leisure 135:20 length 12:23 lengthy 65:3 Lest 9:24 let's 18:23 34:1 38:12 45:20 47:9 62:23 120:10,19 123:19 lethal 146:20 letter 6:14,20 7:13 8:19 9:1,12,17,24 10:3,4,13,13,25 11:7,10 12:1,13 12:19 40:8,18,21 44:13,24,25 45:1
J	K		L	
jail 51:13 January 8:19 9:1 9:13 65:24 109:20 136:11 jeans 128:1 job 42:20 jogger 127:5,14 132:5,19 133:7 jogging 131:8 journalists 47:12 journey 126:3 journeys 144:5	Kara-Murza 55:13 55:15,24 56:18 Kaye 43:25 keen 66:23 keep 66:13 144:16 156:21 kept 108:14 Kew 155:7,14 key 20:9 Khodorkovsky's 35:3 kids 46:4 kill 11:20 51:21 killed 41:15,24 42:15 150:22 kind 35:6 50:19 74:17 127:15 144:9 Kingdom 15:22 kit 116:13 Kleiner 86:8 Klyuev 2:20,21,24 11:13 20:9 50:25 54:17 138:16 knew 13:3,9 16:22 27:21 28:3,5 29:10 30:11 32:2 42:23 72:12 74:18		laboratory 53:22 lack 40:3 118:11,14 156:7 lady 128:16 130:13 130:23 134:7 Lambeth 51:1 landed 16:18 laptop 133:25 134:1 136:21 large 79:5 95:10 late 44:6 71:2 124:24 latest 12:21 launch 31:7 laundering 2:20 11:13,17 12:15 28:8,15,19 31:3 68:10 Lausanne 25:14 law 10:19 11:8 27:8 31:22 32:5 36:10 39:3 40:8 44:3 54:15 56:24 68:24 94:21 laws 65:8 lawsuit 112:12 lawyer 4:22 20:9 52:2 54:9 63:13 63:13 64:3 76:9 76:13,14,15 90:10 138:16 lawyer's 51:3 lawyered 7:25 lawyers 4:20 11:3 11:19 14:6 40:17 40:18 44:25 48:3 50:21 51:9,11 67:16 84:23 85:20 lay 16:7 lead 109:4 Leadbetter 136:10	

45:2,6,7 46:7 48:4 57:15,16,19,22 65:23 66:3,18 67:23 68:2,7,7,22 69:2,14 82:6 85:14,16,19 86:13 86:14 87:6,23 90:5 110:13 141:13 142:8 153:19 letters 11:19 12:1 67:21,22 82:5 92:18 95:5 level 13:2 14:8 79:14 83:6 Lewis 147:21 148:3 149:5 liability 54:16 liaise 100:4 liaison 100:4 102:17 146:8 147:18 157:19 lied 67:6 life 3:4 11:11 37:15 46:20 64:9 70:15 73:15,20 85:21 86:19 87:24 97:17 97:19,21 98:2,12 98:14 99:10,10,20 99:24 130:6 143:7 151:17 158:17 lifestyle 97:4 151:18 lift 90:5 light 68:14 115:21 146:5 157:10 lighting 115:16 liked 102:25 likes 27:20 likewise 96:24 145:3 limitations 95:2 limited 103:20 110:1 150:15 155:23	limits 80:12 103:5 line 12:16 62:2 71:25 83:18 94:11 140:4,8 156:23 lines 51:12 93:16 94:1 119:24 141:7 link 57:25 125:12 list 11:23 56:25 70:4 74:3 86:24 90:2 110:6 136:18 150:17 listen 47:13 listened 16:15 little 30:17 35:13 43:10 87:9,12,12 87:17 89:14 105:8 109:15 115:20 119:2 126:11 150:4 Litvinenko 40:16 53:5,9 Litvinenko's 140:24 live 18:6 19:5,8,22 129:11 lived 19:11 131:22 132:2,7,8 lives 19:3 75:7 102:14 living 18:3 23:4,9 70:14 73:18 101:21 114:8 120:22 Liz 43:25 located 90:25 105:18 136:19 lodged 65:2 logic 107:17 logistical 143:22 London 11:10 12:13 43:7 50:25 51:1 70:10 long 74:1 77:9,11 79:21 102:22 112:10,17 116:7	120:3 129:11 152:16 longer 106:4 116:16 139:24 look 9:4,5 13:1,2 38:1 39:14,16 40:14 50:3 52:19 64:25 66:6 67:20 68:6,12 69:15 85:8,11 89:17,18 90:20 94:6 100:24 109:22 110:16 111:20 112:6 116:6,23 117:13 117:16 118:1 120:10 121:17 126:7 127:15 130:23 132:21 133:22 145:8 147:10 148:1 150:4 looked 3:23 35:6 39:5 65:20 112:2 115:12 117:12,19 118:16 132:18,20 looking 51:5 60:19 68:5 71:7 74:20 97:3 99:15,22 118:12 123:7 156:20 looks 75:13 120:15 121:23,24 130:20 lose 3:7 losing 18:10 losses 58:19,22 lost 3:10 31:13,13 31:14 107:20 128:11 lot 1:9 31:10,14,14 31:15 48:22 63:2 63:9 64:12 67:3 77:6 83:10 84:13 88:16 98:11 99:10 99:10 102:19 107:15 108:6	121:25 122:16,20 123:4,9 127:8 132:23 136:2 lots 19:7 32:4 139:13,14 loud 30:18 love 136:19,25 low 30:21 144:16 lunch 77:16,18 Luncheon 97:14 lunchtime 97:7 Lynne 85:19 <hr/> M <hr/> Macbook 136:25 Macbook' 136:18 machine 37:19 Magnitsky 51:25 54:10,18,22 56:19 66:10 150:12,15 150:18 magnitude 123:15 main 3:14 7:9 12:5 104:4 115:9 major 78:24 79:6 80:9 majority 156:1 making 12:12 32:22 33:2 35:14 138:3 male 105:4 124:21 man 14:13 15:13 17:8 18:6,9 72:12 98:12 115:2,10,11 118:16 122:11 123:1 124:1 125:12,15 132:22 141:2 151:14 Man's 36:22 Management 2:5 150:9,11,15,19 manager 30:14 managing 30:24 manifest 15:15 manifestly 17:7	29:23 manner 45:24 118:5 map 116:6 120:10 120:12,13,14,15 121:7,16,17,23 123:6,19 126:23 127:6,15 maps 114:20 120:14 March 10:1 70:25 155:12,14 Mari 70:10 Mark 147:21 148:3 marker 1:8,16 127:8 market 58:22 markets 58:18 massive 36:4 material 6:7 22:22 48:23 53:3 64:13 64:15 112:7 135:7 137:10 materials 60:9 66:17 matter 3:3,5,6 9:1 33:7 43:5 59:21 76:20 87:1 88:5 90:4 99:6 105:12 107:17 108:11 matters 3:24 49:6 102:24 131:2,13 136:6 143:14 meals 61:11 145:5 mean 31:2 34:6 42:2 77:10 84:12 88:16 92:6 93:23 99:20 123:5 142:18 145:24 153:9 means 10:6 22:11 27:2 98:21 128:7 meant 102:23 103:13 139:17 142:5
---	--	--	---	---

measures 4:12 15:18 19:9 95:7	89:16 104:16 112:3 126:2,18	32:23 49:8 99:5	months 9:2,16 10:14 19:12 34:23	43:6 54:22 67:18
media 8:12 35:11 37:5,25 39:4,25	130:18,22 131:2 131:13 133:9	mind's 115:10 126:9	74:8 111:15 129:13 138:6,13	79:8,9,12,14 93:10,15 94:6
43:23 46:13,16,17 47:10 104:6,12	139:1 155:5	minimis 3:10	moral 36:18 151:5	140:7,9 141:6,25 142:15 155:10
144:13 149:15	mentioning 1:25 91:12	ministry 70:7 88:11	morning 1:4,6 2:3 34:5 61:2	murdered 2:18,21 3:1 51:25 89:1
medical 146:22 154:8	mere 28:6	minor 3:17	mortem 83:12 84:4 84:5,7,9 93:8	92:21 155:20 157:21
medicines 147:3	merely 132:23	minute 76:3	139:12 154:4,5,13 154:23 155:25	murders 81:23
medics 55:18	message 46:3 51:16 104:20,23 105:9	minutes 7:16 113:5 125:21 158:18	156:4	muscle 154:22
meet 75:21 86:8	110:23,25 111:1,2 111:5,8,13,16,23	mischaracterising 46:24	Moscow 50:22 51:2 51:3,4 70:14	<hr/> N <hr/>
meeting 5:5 64:7 69:9,10 75:15,15	112:4,10,11,18 137:12,23 138:3,5	mispronouncing 20:10	74:12 86:23 87:1 88:4,11 90:3	N 160:3
75:20 86:1,2,4,8 87:25 88:8,10	141:16 151:8	misrepresented 98:25	motivated 48:10 93:1	naive 32:14,19
100:7 101:10 103:4,6,23 105:10	messages 20:6 25:20 26:15,23	missed 18:16,18 124:25	motivation 93:21 94:9 97:1	name 20:10,22 21:7 62:11 78:3 113:19
146:10,16,22 147:7,12 150:25	57:6 58:1 75:14 110:21 111:17,21	missing 124:14,15	move 8:5 18:23	145:1,2 149:16
151:2 155:5,13 156:6	112:9 137:19,24 138:2 139:5,13,14	mistake 14:1	moved 80:5,8 89:7	named 4:22 6:21
meetings 8:2 63:3 63:11,15,17,17,20	139:17 140:13	misunderstanding 103:15	movements 60:14 97:4 133:10 144:8	nanny 124:5
64:2,10 66:20 70:1,6,10 75:2,2	messaging 112:17 144:13	misunderstood 122:18	144:18 151:18	narrative 35:10
76:16 100:11,14 100:16,18 103:24	met 42:24 71:17 72:3,9 132:14	mob 38:25	moves 137:15 138:8	narrowly 39:10
138:15 141:17 144:9 155:8,11	145:14	mobile 57:25 60:15 105:4 106:25	moving 34:23 63:2 133:6	nation 31:21
157:16	method 146:4	107:4 136:3	Moxon 33:25 76:19 76:22,25 77:3,15	national 36:5,9 39:1 145:15
meets 121:9	methods 4:5	moderately 30:21	130:3,4 131:16 160:13	147:23,24,25
member 12:24,25 109:20 136:12	metres 123:11,13 123:14,14	moment 16:13 46:21 114:20	movements 60:14 97:4 133:10 144:8	nationalist 35:8
members 11:3 49:9 49:20 52:14 54:15	Mexican 30:1	116:6,25 123:19 159:2	144:18 151:18	natural 54:2 68:14 144:5
55:8 60:11 69:9 72:8	mid-1990s 14:20	moments 48:6	moves 137:15 138:8	nature 19:16 60:13 63:10 64:2,12,22
memory 57:13	middle 25:1 38:11 70:13 77:12 97:9	Monday 40:19	moving 34:23 63:2 133:6	69:3 111:17 134:18 137:11
men 43:2 152:6,9 152:15 153:10,11	113:7 115:23 116:22	money 2:20 3:7,10 11:13,16 12:15	Moxon 33:25 76:19 76:22,25 77:3,15	138:3 139:18
mention 11:22 85:20,23 86:2	middle-aged 115:11	28:8,15,20,21 29:15 30:14,23	130:3,4 131:16 160:13	Navalny 6:14
88:7 132:19 133:5	Midway 91:6	31:3,10,14,14,15 32:22 35:14 58:20	160:13	navy 116:18
mentioned 3:10	million 18:10 29:20 97:22 98:1	68:9 96:10,17,20 105:4 137:17	multi-million 30:1 multi-millionaire 33:3	near 126:20
	millions 3:15 29:14	monies 28:4 29:10	multidisciplinary 155:4	necessarily 83:14 84:13 95:21 98:22
	mind 28:2 31:6	monologue 41:1	murder 2:19,22,23 3:2 10:21 36:22	necessary 1:22 66:24 145:22
		monopoly 36:5	38:25 40:13,15	necessitated 27:7
				need 1:20 58:7 70:21 74:12 77:6 85:15 89:18 93:14

106:3 118:2 126:7 147:13 156:19 needed 42:15 72:16 82:9 92:14 103:12 103:25 147:1 needing 34:11 needn't 8:21 needs 34:7 155:2 negligence 41:7 negotiate 24:16 negotiating 23:19 23:25 25:8,21 negotiation 25:5 neighbourhood 80:7 never 1:12 31:22 39:24 40:1 48:1 74:15,17 nevertheless 92:14 93:19 new 20:10 36:10 101:4 news 33:16 46:19 57:11 67:15 newspaper 34:6,12 38:16 62:14 nice 129:21 night 54:22 81:11 81:19 82:8 83:14 84:21 noble 31:18 nominated 83:24 non-UK 36:23 normal 64:1 73:6 139:15 143:21 144:5 151:18 normally 79:18 144:9 north 114:16,19 127:7 notably 139:12 note 10:2 18:22 22:21 60:23 64:3 64:7,15 70:20 74:4 91:3 101:9	136:10 notebook 147:3 noted 136:16 notes 8:1,3 63:10 64:11 100:14 119:7,9 136:19 notice 32:21 56:10 noticeably 117:12 132:20 noticed 115:2 133:5 notorious 51:18 notwithstanding 26:14 November 9:10 31:24 40:5,6,8 41:14,19 42:22 44:7,14 50:10 61:2 68:3,19,21 68:23 74:9,13 80:8,17 82:6,12 92:23 100:7,8 101:9 113:23 114:6 124:22 154:6,14 number 5:22 14:24 33:10 36:25 38:4 38:6 58:17 72:7 79:2,5 87:15 94:14 95:10 107:2 107:4,5 109:12 129:17 130:10 145:4 146:12 148:5 numbered 148:20 numbers 57:25 110:7 148:23 numerically 79:5 numerous 34:14 101:23	observation 131:11 132:25 observations 134:7 observed 130:14 obtain 60:9 83:19 96:1 150:8 obtained 89:3 109:7 144:1 obvious 31:2 82:23 154:17 obviously 1:8,14,17 19:5 21:16 61:10 73:2 82:22 100:21 103:21 104:25 106:6 110:25 112:2,5 125:16 131:4 141:6 153:1 153:3 155:12,25 occasion 56:1,11 75:1 151:22 occasionally 23:12 occasions 33:10 55:16 56:12,13 71:13 occur 100:19 151:9 occurred 39:24 40:1 42:2,5 55:5 80:21 88:9 103:5 140:24 143:1 145:18 146:6 occurrence 96:12 occurs 86:13 OCG 20:9 October 51:12 109:1 153:18 odd 18:11 offer 4:19 53:21 75:23 offered 1:10 71:15 office 51:3,5 58:23 83:11,12 officer 56:24 79:14 79:18,19 82:18 90:14 106:3 123:21 128:19	129:1 134:7,15 135:6 137:10 140:18 146:23 149:13,21 154:18 officer's 112:22 134:4 149:16 officers 80:25 81:3 81:5 86:4,9 90:9 90:14 91:23,24 94:16 100:4 103:18 106:21 141:14 145:16 officers' 102:17 157:11 offices 50:18,24 100:8 official 30:20 158:20 official's 29:17 officials 42:24 150:17 offline 75:3 Oh 84:6 oil 35:3,5 Okay 7:1 9:11,14 115:15 116:15 117:11 118:23 120:19,20 121:5 121:14 122:2,9 123:19 124:12,18 127:13,17,23 128:9 old 111:16 138:6 older 126:11,11 Olga 58:22 oligarch 33:13 34:21 oligarchs 34:20 once 42:21 46:19 one's 22:15 ones 97:23,25 ongoing 24:18 45:24 68:14 onwards 66:15 open 6:14,20 11:12	12:15 42:17 60:7 65:9 opened 24:3 58:24 openly 144:12,14 operate 64:6 71:21 72:23 144:17 operates 75:24 opinion 88:3 90:2 opportunity 26:12 44:18 98:18 133:22 opposed 3:15 84:5 95:3 104:9 112:14 option 13:9 oral 136:1 order 54:21 99:23 102:10 109:6 123:14 136:24 147:18 148:16 organisation 5:8 25:13 26:6 28:17 42:25 organised 2:20,21 2:24 3:8 11:13 12:14 24:16 40:12 54:17 68:17 72:13 138:16 140:15 original 85:15 142:23 154:4 originally 101:5 outcome 140:5 147:7 outlet 33:16 outset 92:18 outside 70:14 125:22 overall 89:3 111:6 overheard 101:17 102:3 overlooking 29:24 overseas 4:4 95:11 110:11 146:20 157:19 oversimplifying 32:23
--	---	--	--	--

overweight 116:23	parameters 82:24 108:23,25 109:2 112:3 156:24	pathological 92:15 157:16	Perepilichnyy 2:18 3:18 5:18 6:12,21 9:22 12:24 14:9 14:12 23:18 27:18 37:23 38:22,24 40:5 41:10 45:3 45:25 48:11 58:10 58:18,21,24,24 59:14,25 63:4 64:13 65:4 66:20 66:22 67:9,12 68:9 69:6,18 71:5 71:16 72:22 73:9 73:14 74:4 75:15 75:18,21 76:16 82:1 86:22 88:9 88:17 89:5 90:2 90:11 91:13 92:13 92:20 93:1 94:1 94:15 103:8,9,17 104:5,21 105:1 106:8 107:6,10,14 110:2 111:25 132:1 133:23 138:14 139:20 140:16,19 147:16 148:9 149:1,11,15 151:1,13,21 153:7 153:20 157:21 158:16	109:5,6,7,11 111:20 139:8 140:17 144:2,19
Owen 53:14	Pardon 95:15 100:17	pathologist 146:25 155:1	person 4:23 16:21 72:15 75:1,16 101:19,20 141:19 143:1,18 145:14 145:15 149:13 151:22,24	person 4:23 16:21 72:15 75:1,16 101:19,20 141:19 143:1,18 145:14 145:15 149:13 151:22,24
Owens 85:19	Paris 59:13 60:2 61:13 144:20 145:14 146:7,15 147:6,14 157:20	pathology 146:17	personal 5:4 15:17 15:19 19:23 135:20 143:13,16	personal 5:4 15:17 15:19 19:23 135:20 143:13,16
owned 134:2	park 121:23	patrols 129:19	personnel 9:18 157:15	personnel 9:18 157:15
owner 2:11,12	parliamentary 39:8	pause 41:18 121:20	persons 21:17 57:23 158:1	persons 21:17 57:23 158:1
Oxford 126:12 128:1	part 1:13 5:8 22:2 35:24 38:15 45:23 49:23 50:9 52:18 63:20 64:14 97:2 98:23 99:21 102:25 134:15 150:5 154:1	Pavlov 20:8,23 23:16 54:15 57:11 57:18 58:3 70:17 75:6,16,17 140:14 141:7,15	perspective 3:3 92:10,17,19 99:9 100:2 105:2 151:6 151:15 154:17 156:10	perspective 3:3 92:10,17,19 99:9 100:2 105:2 151:6 151:15 154:17 156:10
P	partially 96:25	Pavlov's 20:14 140:18	perspicacity 6:9	perspicacity 6:9
package 50:18,21 51:2,5,5	participant 56:18	pawn 48:11	phone 90:15 105:11 106:24,25 107:15 108:7 109:21 110:21 111:2,12 129:2 136:1,4 137:12,14	phone 90:15 105:11 106:24,25 107:15 108:7 109:21 110:21 111:2,12 129:2 136:1,4 137:12,14
page 10:8,9 45:12 49:23,25 50:4,9 50:11,14 51:8 52:24 55:22 60:18 61:1 65:11,13,15 65:17,21 66:4,10 67:22,25 68:1,6 68:12,21 69:3,25 70:3,10,13,21 74:3,5,9 85:11 86:2 87:13 88:12 91:2,6 100:25 101:5,6,12 109:15 112:16 116:16 117:12 118:20 121:4 135:2 148:13 150:4	participate 21:14	pay 105:13	phones 60:15 74:24 83:2 89:11 96:15 96:19 105:15,18 105:20,21 106:12 106:21,21,23 109:9,22 157:12	phones 60:15 74:24 83:2 89:11 96:15 96:19 105:15,18 105:20,21 106:12 106:21,21,23 109:9,22 157:12
pages 44:22 101:12 112:16 148:13,15	particular 5:11 37:17 52:22 57:7 57:10 66:8 75:16 110:23 146:9 155:15	paying 24:3 96:10 96:16,20	photographic 82:13	photographic 82:13
pagination 101:13	particularly 109:8 131:13 154:19	payment 24:8,11	photographs 84:10 84:11	photographs 84:10 84:11
paid 30:21 52:3 145:1	partly 53:3	payroll 72:18	phrase 98:20 99:5	phrase 98:20 99:5
pair 128:1	partners 157:19	pays 24:22	physical 133:3	physical 133:3
Panorama 53:19	parts 156:3	pejoratively 42:3	Piatov 149:16	Piatov 149:16
papers 77:5 149:21	party 21:25 29:15 103:16 154:12,20	people 2:22,25 3:1 5:7 7:12 8:23 15:22 19:7 25:21 27:15 28:20 30:5 49:12,15 55:5 56:4 57:7 60:12 64:6 73:25 75:2 75:15 83:9 88:24 93:4,13 97:1 98:11 102:14 104:2 110:8,10,11 131:7 141:23 142:6 145:5,10 156:14	pick 20:20	pick 20:20
paragraph 10:16 11:1 51:10 52:23 53:9 54:1 55:13 55:23 86:16 104:22	passed 56:20 111:24 117:22 118:10 123:3	perceive 37:18	picked 112:4	picked 112:4
paragraphs 12:6	passant 9:22	perceived 15:16	picture 1:21 89:19	picture 1:21 89:19
paramedics 81:4 125:9	passenger 114:12	Perepilichnaya 46:3 96:1 100:5 101:18,25 102:10 103:14 105:10,23 106:5 107:3,7,13 107:22 134:3,13 136:6,22	piece 60:13,20	piece 60:13,20
parameter 112:21	passing 45:1 153:7 153:23	perestroika 31:12		

piles 32:22	54:6 56:17 62:4	policing 80:2,5,7,8	potentially 3:4 5:7	30:18 60:8 62:17
pitted 8:7	62:21 65:1 70:19	policy 97:19,21	11:4 61:13 96:22	139:5
place 22:4 24:7	79:23 93:16 105:3	99:7,8,21 147:11	pounds 30:1	previously 3:15
33:9 43:5 44:4	105:24 107:12	147:12	power 130:22	142:24 155:5
47:1 55:9 60:18	125:15,17,22	polite 105:11	powers 108:9	prima 92:25 93:5
101:10 106:7	126:1 150:7	political 55:15 67:7	PR 45:24	93:12
152:17,21 154:14	158:20	politically 48:10	practice 64:1	primarily 95:11
placed 46:22 47:5	points 127:15 148:8	Pollard 23:8 42:22	praise 33:19	printed 120:18
56:24	poison 38:20 40:15	74:2 78:1,2,3,8	pre-existing 22:15	121:7
places 60:24	55:18,25,25 56:11	85:9 89:14 97:16	precaution 17:10	printout 60:21
placing 8:12 42:3	140:23,23,25	101:7 109:13,18	precautions 17:23	prior 80:19 83:3
43:1	141:5 146:19	112:8 123:21	73:17	85:3 88:1,25
plan 36:6	poisoned 55:16,19	133:18,19,21	preceding 12:19	109:9
planned 152:14	146:18 155:18	145:16 157:10,24	precipitated 41:16	prison 51:17,18
153:22	156:25	160:9,15	84:25	52:2 150:16
planning 152:5	poisoning 4:8 43:1	Porton 146:23	precise 10:1 123:25	private 58:16
plans 36:4	56:22 92:21 140:7	pose 24:1	precisely 22:16	129:19 144:7,8
plant 146:25 155:7	140:9 142:1	posed 38:18,21	predominantly	privately 140:16
155:7,15	poisons 53:11,15	position 15:17 22:3	136:23	probability 2:17
planting 42:2	53:22,25 54:1	22:8 58:22 64:6	prefers 75:21	29:9,13
plants 155:15	156:11,16,21	99:17 127:5	prepared 33:1	probably 15:9 28:5
plate 129:17	police 11:11 40:3,7	139:22 152:11	35:14 107:23,25	29:9 38:2 77:4
play 39:3 154:10,12	40:17,20 41:8,13	positive 62:9 111:3	141:22 150:24	103:3 116:5
158:14,25	42:7,14,16,17,20	111:11	151:16 153:14	117:18 121:19
played 159:13	42:21 43:14 46:8	possession 40:22	preparing 85:7	122:10,23 123:16
playing 26:24 27:1	46:16 51:4,4	54:20	present 54:23 61:3	125:20
please 30:16 44:13	59:24 60:5,6,9	possibility 23:11	63:6,14,18 100:11	probe 138:25
49:8 50:9 51:8	67:17,24 68:2,23	81:14	presented 8:22	problem 77:12
52:18,19 55:23	69:10 70:24 71:4	possible 27:5 38:25	35:8	104:3
61:15 62:2 63:2	72:24 73:3,5,8	40:14 62:24 95:23	preserve 83:20	problems 15:21
67:20 69:13,16	78:4 79:3 81:3	135:25	press 37:11 39:9	procedural 94:4
71:12 75:10,11	85:16 86:23 87:1	possibly 82:22	41:10,11,11 53:19	proceedings 26:17
85:11 97:10	88:4 90:3,19,20	99:10 118:21	55:24 75:5 146:7	39:7 139:21,23
100:24 109:14,16	92:7 99:9 102:1	119:12 128:1	150:8	141:1 147:15
113:19 128:15	105:21 110:19	131:12	pressure 101:20	151:20
150:4	113:23 125:9	post 83:12 84:4,5,6	102:13 103:8,17	proceeds 27:15
plucked 29:11	126:1,18,20	84:9 93:8 139:12	108:17	66:8
pm 77:24 97:13,15	128:19 129:1	154:4,5,13,23	presumably 45:8	process 4:21 40:2
113:13,15 157:7,9	130:16 140:18	155:25 156:4	85:17 110:7	63:23
158:19 159:12,14	143:9 149:12,15	postdate 43:13	119:14 120:6	procurement 45:7
159:19	154:18	posting 46:25	125:9 152:9	produce 54:2 93:24
point 12:12 20:1,2	policewoman	potential 27:8	pretend 156:15	produced 159:8
20:20,21 26:1	118:25 119:4	40:13 43:6 86:18	pretty 34:25 123:17	product 36:13,16
29:23 34:6,9,10	policies 98:12,14	107:18 137:1	prevent 10:20	135:10
34:22,25 52:3	158:17	146:17	previous 19:17,18	products 39:25

professional 64:5 112:8,14	149:9	puts 2:25 33:25	73:2 83:7 92:10	80:22 134:17
profile 144:16	provides 57:25	putting 50:24 55:14 57:3 98:21 102:13	93:7 102:19 108:6	138:12 146:11
progress 140:11	providing 99:11		123:25 131:24	real 13:8
promptly 58:24	provision 68:15	Q	144:3 149:8	realisation 28:14
pronounced 21:7	proximate 27:25	question 5:1,12,13 19:2 24:9 27:16	150:24 151:16	realise 30:5
propagate 30:8 35:11 37:18	prudent 65:10 125:19	29:19 30:18 31:4	152:8 153:14	realised 14:1 27:25 34:18
proper 41:8,16 73:17 104:10,11 104:14	public 20:15 34:14 36:15 39:19 43:6 43:8	31:7,17 34:1,2,3	156:2	reality 21:2 30:9,10 32:3 48:8
properly 11:25 31:22 34:1,7 93:7 102:11	publicised 7:3 68:16	36:16 38:19,21	quote 51:22 70:17	really 9:5 13:7 32:21 34:5,11
property 19:17,19 99:22,23 106:8	publicity 37:19	40:25 42:1,11	quoted 55:24	47:15 71:18 77:14
proportionate 108:8 109:5,6 146:2	publicly 33:9,12 49:13 56:21	45:16,20 48:18,20	R	82:25 88:16 92:10
proposed 158:14	publish 7:5	75:11 99:18 115:9	rackets 96:17	93:6 98:11 104:4
proposing 77:14	punish 93:2	126:20 129:11	raise 76:20 87:1 88:5 90:4 92:7	104:4 105:2 133:1
proposition 24:24 53:21 67:5	purchase 99:22,23	132:18 142:14,23	104:19 148:9	139:19 149:18,20
propositions 71:13	pure 13:21 15:25	147:2 148:8,19,20	154:7,9	150:1 153:8
prosecution 94:7 141:13 142:7	purported 21:12 22:25 23:3	148:22 149:8,24	raised 86:11 87:7 87:24 88:22 90:17	reason 5:10 23:6 58:15 59:3 80:13
protagonists 94:9	purportedly 89:4	questioning 1:7 62:3 80:10	92:5 93:7,23	81:18,21 94:12
protect 4:12 52:12	purpose 10:18	questions 1:9,18 2:2,4 6:17 49:4	94:13	99:22 103:24
protected 7:22	purposes 2:24 12:13 149:6,7	52:17 57:2,5 58:8	raising 91:10 103:10	105:13 116:19,21
protection 1:10 71:15 72:16 80:3	pursue 92:15 104:16 145:22 156:19	59:12 61:15 62:2	ran 41:14 132:15 132:15 135:25	118:12 138:4
96:10,16,17,20	pursued 94:2	63:3,9 64:12 67:3	range 61:1 156:21	142:24 146:14
146:24 149:25	pursuit 4:15	74:11 76:2,6 77:1	rank 78:20 79:16	reasonable 145:10
151:3	push 4:2	78:7 106:10	ranks 79:10	reasons 29:8 36:19 80:14 105:14
protective 15:18	put 1:7,16 3:18 8:11 11:14,24	113:18,21 114:5	rare 38:19	138:4 147:11
provenance 57:3	12:9 13:15 29:15	130:2,3 131:19	Ratcliffe 154:4,11 155:21	reassured 136:7
proves 159:2	34:3,10 41:13	133:20 142:16	read 16:15 43:23	recall 8:23 22:14 33:14 57:20
provide 53:3 68:17 92:2 96:3 151:6	62:14 67:5,11	147:5 148:2,7,23	44:22,23 45:14,18	115:20,22 116:4
provided 52:20 53:2 55:12 57:23	71:2,13 73:10	152:10 156:15,24	49:19,24 50:2,5	116:14 117:8
64:13,18 65:5	101:20 103:8,17	158:1 160:6,7,8	53:2,19 55:12,22	118:1,2 120:5,5,6
66:19,22 68:11	103:25 108:15	160:10,12,13,14	58:14 60:18 92:11	121:17 122:6,13
96:22 136:21	112:11 118:24	160:16	reach 89:9 114:22	123:13 126:12,22
143:18 147:13	129:22 130:20	quibble 3:17	reached 80:14 81:6 156:22	128:25 133:3,3
	Putin 33:9,18 34:15 34:18 35:7	quick 31:10 66:14 116:11	read 16:15 43:23	Recalling 118:3
	Putin's 36:25	quicker 32:6	49:19,24 50:2,5	recap 5:20
		quickly 10:12 37:22 40:13 45:15 116:10	53:2,19 55:12,22	receipt 28:7
		quite 13:21 31:18 34:1,9 45:17 55:2 55:4 59:7 72:1	58:14 60:18 92:11	receipts 145:9
			98:13 119:9	receive 94:17
			124:18 136:11	received 28:4 45:8 45:10 49:10,16
			150:8	51:9,12 52:8 69:5
			readily 110:7	
			reading 3:19 49:23	

69:6,19 90:15 91:7 93:25 106:19 148:11 157:13 reckless 151:10 recluse 144:12 recognised 1:14 recognition 129:17 recollection 125:16 128:9,13,16 record 17:22 23:2 25:17 33:7 59:21 94:17 124:9 128:19 143:11 recorded 18:22 90:1 101:17 117:11 128:19 147:3 150:6 recording 159:5 recordings 159:13 records 74:4 101:18 134:8 recount 17:19 reduce 25:9 refer 10:4 11:25 66:10 86:15 119:25 reference 9:22 26:17 70:3,6,13 104:13 111:22 138:3 referred 3:7 12:20 53:18 58:4 89:25 104:21 111:24 117:3 153:24 referring 3:24 6:16 20:23 39:18 40:9 43:24,25 112:19 135:1,4 reflect 7:14 reformer 34:19 reforming 35:7 refuse 42:16 refused 40:20 46:16 88:18,20 refusing 42:14	regard 96:11 regarded 137:1 regarding 91:17,19 148:10 149:2 regularly 110:10 regulators 37:11 reinforced 143:17 related 82:1 105:12 107:13 125:20 135:19 149:14 relates 112:12 123:6 relating 107:7 148:5 relation 22:21 92:13 109:18,19 141:20,21 relationship 4:21 12:23 76:11 141:2 141:16 relatively 69:15 153:25 relatives 45:3,5 relaying 125:23 release 107:25 released 106:7 147:2 157:25 relevance 138:6 relevant 1:22 68:18 107:3 109:3 136:25 139:10 140:3 reliant 80:22 96:18 96:24,25 relied 80:24 97:2 relying 8:13 remainder 63:17 remark 130:16 remember 5:14 6:9 32:17 41:23 44:23 45:11 59:17 115:9 115:11,12 116:2 117:9,10 118:21 118:22,24 119:4,6 119:14,16,25	123:22 124:10,11 124:12,14,15 126:9,18 128:8,21 128:23 131:12 133:9 remind 9:7 41:21 remove 77:5 renowned 4:22 reopen 54:21 repay 58:20 repeat 5:15 22:19 27:16 119:3 122:14 128:11 repeating 9:20 repetitively 46:22 reply 137:17 report 65:24 72:24 85:7 86:9 100:20 109:16,18 112:11 124:16 134:17,25 137:10 reported 27:23 49:20 67:4,8,12 71:5 73:4,8 86:21 86:23 88:21 reporting 71:9 75:5 reports 53:19,20 80:22 represent 130:6 131:20 representative 88:11 representatives 86:5 represented 150:25 representing 90:11 151:1 reprise 4:2 republicised 6:2,12 6:19 republished 6:14 reputation 48:14 request 10:19 11:12 12:2 95:5 110:13 141:14	142:8 require 37:15 required 95:4 requires 37:13 researched 144:18 resident 83:9 residents 10:21 resists 75:21 resolved 20:4 153:10 resolving 152:11 resources 3:6 respect 17:1 43:10 83:15 90:1 92:5 96:25 104:1 respects 92:9 respond 40:17 154:18 response 40:3,20 68:22 80:7 88:17 92:21 108:12 126:19 147:3 responsibility 13:1 80:3 responsible 8:12 41:18 80:1,7 93:17 restaurants 145:3 restrained 38:7 restraint 37:13 45:23 154:21 restriction 39:21 restructuring 36:6 result 68:14 81:5 81:12 91:14,16 102:17 112:21 118:11 137:8 resulted 82:20 results 94:3 135:14 137:6 154:15 155:8 resume 157:25 retained 5:2 83:5 retrieve 107:16 108:9	retrieved 135:20 return 50:24 75:7 returned 144:19,21 returns 30:22 revealing 47:11 reveals 5:21 review 26:22 44:19 138:1 reviewed 83:10,13 135:11 140:10 141:6 reviewing 34:5 141:8 revisited 140:10 richest 33:13 right 1:24 5:2 10:10 12:12 15:12 20:5,5 21:8 30:19 31:12 36:21 38:12 45:4 47:17 49:1 49:13,17 50:20 51:8,18,23 52:10 53:1,5,16,23,24 54:3,4,7,10 55:3,6 55:14 56:16 57:8 57:9,12 58:5,12 59:20,21 61:19 62:4,12,20,23 63:12,24 64:16 65:1 66:8,9,11,18 66:21 67:1,18 68:23 69:11,16 72:10,14,19,20 73:4,23 74:6,9,10 74:14 75:8,9,18 97:6,8,12 99:1 101:1,2,12 114:8 114:17,22,24 115:6,23 116:21 119:23 121:18 122:4 123:3 125:5 125:10 129:14 130:9 131:24 132:22 133:12 143:7 152:2
--	--	--	--	--

153:18 158:3,6 159:10 rightly 71:24 156:2 rights 35:17 37:9 37:10,12 47:18 48:9 rise 98:23 113:4 153:12 rising 76:19 risk 2:25 8:22 9:18 11:3 13:8,10 15:16,19 25:9 67:17 68:11 risks 151:2,15 road 81:14 114:15 114:21 115:22,25 120:24 121:2,3,8 121:9,13 122:6 125:18 126:3,13 roads 131:3 Robert 53:14 Roger 4:22,23 5:2 91:7 role 103:1 156:16 Roman 35:5 room 147:8 152:10 roubles 138:10 roughly 3:14 round 144:3 route 142:24 Roy 135:12,13 Rudnick 8:18 9:12 10:2 12:18 40:9 68:1 82:7 84:23 85:18 rule 31:21 32:4 39:3,4 44:3 run 31:22 47:8,10 122:5 runner 118:6 running 89:14 115:3,5,11,13 116:13 117:7,8 118:4,14 122:12 124:21 132:5,7	133:1 runs 66:4 74:5,7 Rus.com 20:11 57:11 rushing 124:24 Russia 3:12,13,16 14:15,18,19,23 15:1,14,20,20,24 16:2,4 18:9 30:15 31:8,20 35:19,23 36:11 37:6 51:1 53:15 56:24 58:10 58:25 59:4 71:24 73:20,22,22,24 74:7,13,16,17 75:7 95:11 96:5 96:10,11 141:14 141:23 142:6 Russian 4:3 5:6 13:3 14:21 16:18 24:14,17 32:16 38:19,25 40:11 43:6 50:25 51:18 53:10 54:9,15 55:15 56:5 68:16 70:15 110:17,20 112:10 135:11 141:19,19 142:25 143:2 149:12,15 Russians 58:17 72:7 73:16 143:3	salient 136:12 samples 154:24 156:2 sanctions 56:19,25 sandwich 62:1 satisfied 108:5 satisfy 142:17 Saturday 40:18 savings 36:9 saw 44:16 114:5 116:1 123:1,12 124:1,21 125:9 127:5,14 131:14 132:4,12,13 133:11 saying 8:6 16:21 18:7,24 19:3,9,24 23:18 26:19 41:3 46:4,5,9 55:24 62:6,6 89:18 101:20 102:11,12 104:15 122:19 128:13 149:19,20 150:6 says 10:17 17:18,19 19:21 45:4 50:13 60:23 68:12 88:2 90:6 91:6,14,20 91:25 92:8 104:17 124:9,19 148:24 Sazonov 110:17 Sberbank 36:8 scale 17:8 65:12 scam 28:15 scanning 112:9 scant 62:5 scared 73:24 scenario 141:11 scene 81:2,4,17 82:21 83:1,3 84:10,11,17 126:21 157:11 scenes 81:21 82:17 schools 16:17,18,19 scores 37:24 38:7	search 22:14 51:4 82:20,24 112:3,21 147:1,10 searching 135:7 147:8 Seasons 61:9,25 sec 28:6 second 12:1 52:18 52:19 53:2 54:5 55:11 56:1,11,22 75:10 78:13 105:3 108:10 116:16 117:12 123:8,8 126:14 seconds 116:9 118:9 Secret 43:1 secretive 143:24 144:8 section 52:22 112:17 148:2 secure 40:14 83:19 83:19 security 4:18 5:4 5:17 17:10 18:5 18:15 39:1 53:10 75:20 89:9 129:14 143:14,16,20,20 144:5 151:3 see 7:11,24 9:1 11:4 13:5,11 14:2,9 16:25 22:7 26:18 28:1,22 29:5 35:13 39:6 42:21 44:2,25 45:20 47:17 51:14 52:5 57:21 65:11,23 66:3,10,15 67:23 68:19 69:14 74:12 75:14 85:15 87:19 88:12 91:2,8 92:7 93:24 98:18 104:21 110:23 111:21 117:14 120:10,21,24	121:2,6,8,11 122:11 126:20 131:2 seek 108:9 142:8 151:3 seeking 45:23 59:8 144:16 149:25 seen 8:20 21:4 50:19 75:5 81:7 88:24 95:9 100:14 119:1,5 125:12,15 125:19 126:2 130:18 134:10 seized 83:3 96:19 106:12 selections 98:22 self 48:10 self-same 8:13 semi 115:21 send 29:21 86:7 154:24 senior 56:24 79:18 79:19 82:18 84:15 sensationalist 43:12 44:5 sense 23:7 25:23 73:14 sent 40:18 44:24 50:21 51:2,16 82:6 86:4 91:24 153:19 sentiments 45:18 separately 75:6 separating 71:21 September 38:24 74:6 152:23,24 sergeant 79:10 Sergei 54:18,22 150:12,15,18 series 66:20 73:6 148:2 serious 12:14 55:3 seriously 15:10 servants 5:3,17 service 43:2 79:3
	S			
	S 13:25 sacrificed 48:14 safe 15:22 18:12,13 19:14 safer 15:23 safety 7:3 15:17,20 19:23 86:10 91:11 91:13,17,19 101:13 102:15 137:9 143:10 148:10 149:2 151:11			

141:13 142:8 143:21 services 53:11 56:5 set 8:21 10:18 53:13 65:3 69:2 69:17,24 82:25 94:14 95:18 108:24 109:2 113:5 115:19 152:18 153:4 156:19,19,24 setting 57:16 68:25 138:14 settling 138:18 shading 121:24 shallow 114:22 share 36:8,10 shareholder 37:9 shareholders 2:9 shirt 126:12 128:1 shocked 150:7 Shocking 38:21 shopped 60:1 shops 60:12 short 57:24 68:6 76:20 77:23 113:14 131:24 157:4,8 shorter 78:13 113:24 shortly 56:22 67:14 100:5 153:25 shorts 116:14,18 show 10:4 54:13,23 66:17 87:6 showed 25:22,23 26:2,7 144:2 145:5 showing 28:25 29:1 shows 46:23 60:25 111:11 shut 56:15 side 57:4 75:19,22 114:24 115:25 116:4 121:18	126:13 signed 50:10 78:10 99:6 significance 94:18 104:23 111:5 141:16 significant 68:11 99:12 105:2 111:23 significantly 43:13 signs 81:13,15 82:23 silly 137:15,21 138:8 SIM 107:4,9 108:22 similar 10:3 11:20 55:2 64:6 68:25 70:10 89:12 92:1 93:4 111:16,16,21 138:2,3,7 simple 48:3 simply 13:8 67:6 73:4 118:16 120:2 143:5 sincerely 45:4 single 96:6 154:15 SIO 79:12,14,24 80:9 82:12 156:10 sir 1:6,16 19:15 33:21 38:1 49:3 49:22,22 53:14 57:22 58:7 60:17 60:22 62:15,19,24 64:25 65:10,12,20 67:22,25 70:20 74:1,4 76:1,2,19 76:25 77:16,25 78:3,12,16,19 79:2,7,13,20 80:18,20 85:2 86:6,12 92:17 94:19 98:17 101:3 101:8 109:19 112:20,23 113:2,4	113:16 143:11,15 157:4,24 158:7,12 158:13 159:2,15 siren 11:6 sit 77:9,17 78:5,6 situation 5:21 11:16 88:23 107:22 108:3 150:10 situations 23:6 88:24 six 22:24 56:15 79:22 six-month 144:2 sixth 148:8 Skelton 8:18 9:12 9:20 12:20 33:13 33:21 34:3 76:2,6 76:7,18 77:16,20 77:25 78:7,8 87:18,23 97:16 101:4 113:2,4 133:18,20,21 138:13 148:17,20 157:4,6,10,23 158:13 159:2,5,8 159:15 160:8,10 160:16 skin 133:4 154:22 skip 66:14 Skype 20:6,10,22 21:6 25:20 26:15 26:23 57:3,5 58:1 74:22 75:2,13 111:19,21 112:7 112:17 113:3 136:1 138:2 144:13 slur 27:12 slurs 25:24 small 4:2 13:24 29:12 76:3 121:7 smaller 120:14 Smiths 61:4 so-called 9:2 90:2	social 144:13 SOCO 81:16 82:3 82:13 software 135:8 sole 2:11,12 15:6 solicitor 153:17 solicitors 63:18 100:9 101:11 102:20 151:1 Solikamsk 51:17 solitary 9:21 17:9 22:21 somebody 54:12 71:19 102:12 115:12 125:19 126:2 133:1 soon 127:20 sophisticated 4:5 7:25 47:8,10 56:2 sophistication 12:17 14:6 sorry 17:12 18:8 22:19,23 26:1 27:16 33:5,21 40:23 62:16 75:25 76:25 79:17 87:12 88:13 90:22 110:5 117:10 119:2 121:20 122:14 128:12 137:11 148:17 sort 30:21 52:7,10 94:4 95:18 118:3 sorts 31:13 99:16 sought 53:7 80:11 143:12 sound 16:23 sounding 21:6 sounds 132:11 source 30:6,24 155:4 south 114:16,19 122:3,16 space 121:18 spare 43:11 90:25	speak 2:7 20:25 86:5 91:23 100:16 100:18 103:4 141:11,15 149:5 speaker 110:18 speaking 77:4 80:23 118:24 119:4 special 56:5 specialised 54:1 specific 69:17 143:19 specifically 41:12 88:8 96:6 specify 123:5 speculate 127:24 139:16 speed 12:3 spend 28:12 64:9 74:1 spending 3:5 spent 35:23 36:11 64:21 143:5 spirit 1:19 spoke 81:5 110:19 119:10 123:21 135:11 143:18 147:24,25 spoken 21:17 55:21 sponsored 4:4 spouse 29:17 St 19:3,6,22 114:9 120:16 125:6 129:12 131:3 ST/02 109:22 110:17 ST/03 107:2 109:22 staff 49:10 52:11 60:11 63:4 64:16 64:21 65:5 67:4 69:4 72:4 stage 4:17 5:18 42:25 47:22,25 77:8 83:19 89:4,5 92:22 95:6 108:2
---	---	---	---	---

108:5 131:12 139:8 142:10 154:23 stages 93:6,18 staggering 128:4,5 Staines 81:1 90:15 stamp 111:3 stand 78:5 Starbucks 75:22 start 2:4 31:11 78:20 80:16 106:12,13 127:3 started 35:2 42:21 92:19 100:4 103:2 starting 115:18,19 159:6 starts 121:15 state 4:3 28:2 31:6 32:23 113:19 stated 81:24 statement 6:6 9:9 16:10 49:23 50:10 50:13 52:18,19 53:3 54:5 55:11 55:23 57:4 59:9 59:10 70:24 78:13 78:14 86:3,16 88:6 89:25 90:5 98:18 105:16 108:13 114:11 115:8,9 116:15,16 117:11 118:1,19 118:23 119:22 123:23,24 126:7,8 126:15 127:2 128:2,10,14,17 130:18,20 132:19 133:5 159:9 statements 34:14 60:11,12 64:22 66:17 78:9,17 89:4,6 113:22 114:2,7 148:25 States 28:9 33:16 56:20	static 119:2 128:12 stating 105:4 station 124:6 status 22:2 91:15 141:7 142:11 stay 61:24 113:5 stayed 59:25 144:23 stealing 58:20 steep 115:13 121:15 steeper 114:23 step 18:16 141:18 Stepanov 7:13 27:15,20 30:12,14 30:24 75:6 149:14 152:1,22 Stepanova 30:20 58:22 Stepanovs 15:21 16:3,22 18:11 30:19 58:19 steps 66:6 91:21 stolen 3:8,13 stomach 119:23 120:3 133:7 155:22,25 156:3 stonewalled 142:19 stop 43:1 93:2 97:12 stopped 80:13 storeys 54:24 stories 8:12,13 42:4 Story 36:21 straight 5:10,12,13 34:10 90:5 125:13 125:14 straightforward 110:14 strange 35:6 stranger 21:6 strategy 10:20 12:18 STRAW 131:19,20 133:12 160:14	straying 33:22 strike 13:25 striking 8:8 stripping 36:4 strong 2:17 34:17 struggling 117:3,4 118:17 133:2 studied 14:15,18 style 47:18 subject 27:25 28:15 32:10 77:11 140:4 subjects 5:16 151:25 submission 62:19 submitted 46:8 54:21 subscribe 37:13 subsequent 11:10 88:22 95:6 103:21 105:10 111:17 subsequently 8:13 27:7 89:8,11 111:24 124:25 subtle 156:21 suburbs 43:7 succeed 12:10 successful 30:21 56:23 97:21 98:5 successfully 139:22 sudden 79:1,2 suffer 22:9 23:12 48:16 suffering 23:13 sufficient 108:6 145:20 149:6,7 suggest 7:24 8:2,10 11:18 13:5,6,20 14:5 22:7 25:19 28:4 48:8 55:4 59:8 61:12 71:2 75:18 96:16 144:17 suggested 11:2 138:13 suggesting 10:12	13:16 15:13 17:1 17:3,4 32:9 39:2 44:2 47:7 51:17 107:8 suggestion 22:10 64:14 67:10 136:21 suggestions 139:6 Suisse 66:16 suit 67:7 suits 44:3 summarise 45:22 135:14 summarises 66:18 summarising 23:17 109:21 summary 50:13 53:1 64:18 71:17 118:17,18 summer 27:23 sun 115:18 supergrass 41:15 41:23,24 superintendent 78:1,4,8 79:17 97:16 133:18,21 157:10 support 35:2 37:12 99:24 supported 34:25 supporter 34:18 supporting 34:23 suppose 84:1 103:11 140:1 157:2 supposed 25:11 sure 2:6 19:15,18 26:11 27:21 53:18 54:6 55:12 57:14 70:20 114:19 152:20 153:16 surmise 34:13 surprise 1:11 surprised 32:10,12 74:18	Surrey 18:4 41:15 41:24,24,24 67:16 67:24 68:2 69:10 70:24 71:4 78:24 80:9 101:21 survived 54:25 suspect 58:12 134:6 141:10,19 143:1 155:9 suspects 93:13 suspicion 108:19 153:12,22 suspicious 50:18 81:6,20,23 82:2 82:15 83:21,25 84:7,19 94:24 98:9 100:1 106:3 106:11,14,18 112:25 129:4,8,9 130:15 137:9 141:3 145:18 Sussex 78:4,24 80:9 110:19 sustained 11:22 Suter 44:13 158:14 159:5 Suter's 159:8 Suzanne 136:10 Suzy 136:15 swiftly 90:25 Swiss 25:15 27:8 44:25 65:2,24 66:23 93:3 94:7 138:23 139:20 147:15,18,23,24 147:25 148:6 149:25 150:24 151:16,20 153:9 153:14,17 Switzerland 16:20 25:14 26:7,18 29:1 65:8 66:1 149:12 157:20 sworn 78:2 160:9 symptoms 156:7
---	---	--	---	--

system 32:16 35:25 36:12 85:18 102:1 129:17 153:3	targets 5:22	tests 40:15 82:11	14:11,20 15:23	137:16 154:11,20
systems 36:4,7 143:11	task 105:7	93:9 94:3 139:12	18:12 19:24 22:7	third-party 154:10
<hr/> T <hr/>	tasked 112:14	140:5 155:13,15	22:13 23:16,18	thorough 42:21
T-shirt 116:16,18	Tatiana 111:1,10	155:17 156:9,19	24:21 25:1,14	thought 10:25
tab 65:18,21 85:11	taught 51:21	156:20 157:2	26:11,13 29:9,12	24:18 25:8 34:19
87:8,8,9,9,11,12	tax 30:22 58:23,23	text 21:22 51:20	30:15 32:15,23	35:6 44:9,11
87:12,17,18 91:2	Taylor 103:2	52:1 137:11,12,16	33:23 36:20 37:15	73:17 76:22 82:2
100:24 109:15,15	team 12:25 49:20	138:9	42:15 45:25 47:17	117:18,20 124:1
135:1,1	57:16,24 69:9	texts 135:21 137:13	50:4,8,15 52:22	125:18 129:1
tabs 109:13	78:25 79:6 80:9	thank 1:4,5,24	56:4 60:8 61:21	134:18 150:10
take 1:15 4:10	80:11,22 82:13,13	26:21 44:14 49:3	61:23 62:4,8,9	thousands 38:8
15:18 16:11 29:14	82:17 86:5 89:22	51:7 57:1 76:1,18	64:5 65:20 67:5,9	thread 41:3
29:15,20 30:5	109:20 112:2,6	76:23,24 77:15,20	67:21 68:22 70:8	threat 11:11 14:8
34:14 37:22 44:21	136:6,13 137:4	78:6 87:23 90:8	73:5 75:5 76:9	24:1 50:19 51:12
44:22 45:14 64:2	143:5 144:18	91:1 100:23 101:3	77:4,10,16 83:10	67:8 72:4 73:7
64:7,10 70:23	technology 120:11	111:4 113:12	84:22 85:10,15	87:5 88:7,8,15
72:15 76:3 82:18	telephone 47:12	120:9 130:2,8,13	86:1,7,13 87:23	109:10
86:16 88:23 89:2	91:7 107:4	131:12,16,17,21	89:21 90:10 91:2	threatened 88:25
89:10,15 92:24	telephones 106:3	133:12,15,16,17	91:24 95:18 98:1	threatening 46:3
98:11,13 99:20,24	telephony 21:22	137:6 157:6,23	98:15 99:7,13,14	threats 11:14,20
102:3 106:7 125:2	tell 23:17 27:17	158:8,11 159:7,11	100:7 103:6	14:1 49:9,15,19
131:7 141:18	47:12 60:23	159:16	105:17 106:10,10	51:9 52:7,10 67:3
145:20,22 152:13	131:22 132:11	thankfully 54:25	108:2,12,15	67:11 69:3,4,6,18
152:21 153:20	156:17 157:3	thematic 11:22	111:14,18 116:7	71:4,9 85:20
156:2 157:4	telling 39:23 64:23	theme 8:7 11:7	116:15,20,21	86:18,20 87:24
158:21	101:19 119:7	themes 11:20	117:3,17,20	89:12,13 92:13
taken 3:12 9:24	152:11	theories 30:8 43:3	118:10,23 122:14	93:25 137:9
19:17 20:7 35:16	tendency 22:13	48:17	123:21 124:7	148:10 149:24
63:10 64:15 81:19	terminology 98:21	theory 15:25 16:1	125:15 126:14	three 3:7 44:22
84:11 90:16 91:21	terms 88:14 95:1	18:18,19 25:7	127:14 128:13	62:17 86:7 101:12
101:10 105:20	102:7 112:9	thereabouts 9:16	130:9,16 133:10	101:16 116:9
112:13 144:4	127:25 137:8	thing 24:20 46:15	134:5,12,17,18	121:20 151:1
152:17	138:24 141:25	56:17 90:6 93:9	135:23,25 136:5	three- 116:11
takes 158:19	142:12 144:12	93:14 133:5 146:9	139:2 144:10,11	three-day 77:3
talk 97:10 113:9	147:8 149:23	158:10	146:4 147:24	thrown 155:21
talking 5:15 18:1	156:13	things 16:3 30:7	148:13,15 151:14	Thursday 105:6
22:23,24	terrifying 51:13	32:4 37:7 38:3	152:18,24 153:5	till 34:25
tallied 64:22	test 57:14	46:5,10,10 47:6	153:18,19,21	time 3:5,13 28:12
tally 58:1	tested 107:19	48:25 60:12,14,15	154:15 155:14	34:15 35:24 36:11
tangential 28:13	testified 7:10 12:22	63:10 64:2,22	156:1,8 158:18	42:6,7 43:16
tapes 158:15	testifying 93:2	72:19 73:3 83:22	159:15	44:24 64:10,21
	testimonies 39:8,8	89:15,17 99:16	thinking 30:18	72:6 78:20,23
	testimony 139:2	144:9 148:5 156:7	98:9 138:24	79:6 83:1 84:3,22
	150:6	think 1:19 4:16 8:3	thinks 18:12 19:22	92:5 95:8,14,16
	testing 155:7,23	12:6,10 13:8	third 29:15 103:16	98:3 99:3 102:22

103:20 104:7,18 105:20 106:14 108:4,16 109:2,6 112:5 113:2 114:8 115:16,19 116:19 116:19 117:11,21 120:22 124:3,11 124:22 128:15 133:11 138:11,21 138:22 140:21 143:5 157:21 158:13 timeframe 111:18 137:25 timeline 86:22,24 88:2 108:25 times 90:11 144:3 155:12 timing 127:21 152:13 153:8 timings 114:20 123:20,25 tired 115:13 titicoke 71:19 title 36:21,23,24,25 titles 36:20 today 77:9,10,14,16 77:19 97:7 106:10 128:21 133:4 today's 158:19 told 6:24 7:7,9 16:1 16:5 18:9 21:3 49:15 58:15 71:10 72:24 84:13 86:24 90:13 104:18 119:10 122:24 127:4 128:20 130:15 134:2 tolerate 35:14 tools 37:8 top 11:19 14:6 101:1,12 120:21 122:11,25 123:11 123:17,18 totally 29:13	touch 40:7 toxicological 92:15 157:17 toxicology 40:14 146:16,24 154:25 155:3,6,7 toxin 56:2 toxins 54:2 traceable 56:3 traces 94:18 trading 2:7 traffic 81:14 trailed 1:12 train 94:14 124:4,6 124:7,11,24 trained 135:7 transactions 136:2 145:4 transcript 3:19 transcripts 16:15 111:21 148:25 transfer 66:7 137:17 transferred 105:5 transfers 28:3 translated 112:10 112:18,19 150:5 translations 111:19 transparent 39:20 transpired 106:25 travel 97:4 143:22 143:25 144:1,13 travelled 89:7 traveller 144:10 travelling 114:16 126:15 127:18,19 144:3 tread 108:18 treat 7:16,18 82:10 treating 55:19 triangle 121:8 tried 96:1 111:2 145:24 150:8 triggered 82:3 83:24 84:2	trip 60:2 147:9 trips 149:11 trouble 28:9 true 3:23 13:23 17:11 25:10 26:10 30:5 36:21 78:17 114:2 truth 3:4,6 35:12 35:13 38:14 152:11 truthful 26:3,14 try 12:8 54:21 59:17 93:19 142:24 trying 12:6,13 18:20 29:4 34:20 36:11 42:17,18,19 42:20 43:17 52:12 60:13 62:24 64:21 90:24 143:23 Tuesday 40:19 158:2,9,10,10 159:18,20 Turkey 38:23 turn 8:21 20:6 30:7 33:1 49:22 60:17 60:22 65:10 70:21 105:15 109:12 turning 52:3 tweeting 39:21 tweets 37:24 38:2,4 38:6,8,13 39:11 39:19,20 42:4 43:12 twice 152:23 twist 30:7 Twitter 38:1,17 46:22,24,25 47:5 two 9:2,2,15 10:1 11:6 12:5 13:5 14:11 15:6 16:16 36:20 44:10 48:15 51:25 55:16 58:2 62:7,17 65:16 78:8 81:3,10 89:4	93:18 105:6,21 106:25 109:1,9,22 112:4,16 113:4,22 120:14 122:2,2,3 122:20 123:3,6 127:11 137:13,19 138:10 145:5,10 152:6,9,15 153:10 155:11 two-page 68:7 113:24 two-week 109:5 137:25 tycoon 38:19 type 4:23 9:25 41:6 135:7 137:23,24 types 4:24,25 80:10 typical 52:7 <hr/> U <hr/> UK 10:19,21,21 36:25 73:18,22 95:2 96:5 110:6 110:15 144:19 Ukraine 95:12 96:5 96:10 146:2 Ukrainian 145:15 ultimately 94:12 156:8 unable 26:4,6 unambiguously 104:19 unascertained 154:16,24 unaware 29:13 uncommon 154:19 154:23 understand 8:7 11:15 13:15 27:1 32:14 40:5 45:5 45:18 47:7 49:21 59:22 64:15 66:7 71:7 72:6,11 98:1 102:11 103:18 105:17 110:2,12	125:23 135:9 138:12 153:2 156:15 understandably 4:11 33:23 89:15 understanding 58:9,14 61:23 63:7 74:15,20 99:25 106:2,5 110:6 understood 1:24 24:13 33:11 53:25 57:6 59:3 73:21 76:15 97:19,23 103:5 122:19 125:25 152:22 undertaken 140:5 underwriter 98:24 undetactable 4:5 unexplained 37:18 82:10 108:4 unfair 9:15 12:7,8 44:21 unfairly 23:17 unfit 118:16 unfortunately 102:22 121:7 128:8 Unified 36:4,6 Union 56:21 United 15:22 28:9 33:16 56:20 units 80:4 University 146:11 unknown 101:19 unlawfully 33:13 unsigned 45:2 unsuccessful 16:19 145:25 untabbed 100:25 Untouchables 6:20 untoward 145:17 146:5 untraceable 54:2 unusual 69:23
---	---	---	---	--

131:2	138:18 145:20,22	9:25 11:8 12:25	122:6	9:9 16:9 28:23
unwell 117:13	150:7,20 152:10	13:10 22:17 45:24	Western 33:18	30:6,7 43:21 49:7
132:20,24,25	152:13 157:20	88:19,22 96:15	WH 61:4	52:18,19 55:23
133:8	viewed 23:20	98:17 106:24	whatsoever 4:18	59:8,9 60:10,11
unwilling 49:12	112:24 137:8	107:24 130:16,22	whereabouts	62:25 70:24 77:25
uphill 114:22	views 43:22	141:22	144:18	84:16 100:24
upset 46:13	Vigorous 34:17	WASTELL 113:16	whichever 78:5	141:9 151:3
urine 156:4	vigorously 34:15	113:18,19 130:2	whilst 27:10 32:22	157:13 159:1,8
use 37:8,9,17 98:3	vintage 112:5	133:16 160:12	33:2 35:13 39:2	witnesses 14:11
144:13 156:4	Virginia 19:12,25	water 19:12,25	50:5 62:25 113:5	40:1 42:5,6,8,10
useful 36:13,15,16	20:21	20:21 120:7	146:20	42:18,19 43:17,20
useless 107:11	vis-a-vis 152:14	way 7:16,18 18:16	whistle 28:16 29:1	woman 126:5,11
uses 20:16 98:20	visa 58:1	22:15 31:24 33:24	30:13	128:20 132:9,15
usual 7:16,18,24	vision 116:8	37:7 41:8 53:1	whistleblower 6:3	wonder 33:21
8:2 158:9	Vladimir 34:18	56:10 61:2 68:25	6:13,21 7:17 26:5	word 16:11 34:17
utilise 44:2 108:9	voice 105:11	99:12 118:24	40:10 94:8	42:3 98:3 154:15
	voicemail 104:20	122:5 129:2,5,22	whistleblower's	words 12:9 19:12
	105:14	131:7 137:20	38:25	32:17 94:5 130:23
V	volume 49:24 50:4	141:10 144:7,17	whistleblowers	136:19 152:15
vacate 158:21	50:7,8 70:21 74:3	149:20 151:18	7:19,20,21	work 52:4 57:17
vagaries 73:19	74:5	ways 25:22 146:17	white 100:23 101:1	92:18 120:19
vaguely 72:21	volunteered 126:19	wealth 44:3	116:16,18 117:13	135:20
126:10		wealthy 17:7,9	117:19 120:18,19	worked 14:15,19
validity 20:18	W	58:17 72:7 98:12	126:12 128:1	79:9
valuable 3:19,21,22	waiting 94:2	wearing 116:13	132:20	working 78:24
4:14 7:16 26:5	walking 118:4	126:12	Whitworth 98:15	138:16
value 92:3,6	128:4,5,10,16,20	website 6:20 7:6,7	widely 112:2,6	works 152:9
Vanna 70:10	130:14,17,23	7:7	wider 48:11 82:20	world 13:21 71:21
variety 4:11	131:4,9	Wednesday 40:20	112:21 156:21	72:22 75:24
various 9:18 53:19	walks 131:8	week 103:4	widow 13:16 17:2	worry 70:22
63:3 66:6,16	wall 31:11	157:25	27:11 44:10 47:23	worth 3:5 14:18
90:11	want 10:4,16 12:4	weekend 144:20	48:1	98:2
vast 32:22 44:3	28:12 29:7 31:17	weekends 159:17	wife 15:5,16 48:15	worthy 137:2
verbally 100:21	38:5,10 44:21	weeks 91:19 109:1	59:2 74:18 103:1	wouldn't 15:18
verification 65:7	55:9 60:22 68:17	109:9 112:4	106:9 114:13	23:8 37:17,19,23
verify 64:21 65:5	74:1 119:24 130:9	weight 33:9	117:23 129:1	38:16 84:12 96:6
versa 137:22	wanted 64:25 73:1	welcome 131:18	132:1	102:22 142:11,13
version 16:9 58:13	73:9 98:13 99:20	133:13	WILLIAM 1:3	144:16 145:13
85:14	102:9 141:10	went 14:19 20:9	160:5	156:15
vice 137:22	142:1 151:6	22:17 29:21 30:15	wire 28:3	write 12:18,18 48:3
victimless 11:16	156:17	31:20 41:11 48:5	wish 35:11 49:22	59:6 67:16
view 12:22 33:18	wants 144:7	59:25 74:16,17	60:17 77:5	writing 9:16 10:18
63:22 72:15 75:23	warning 158:9	91:23 92:7 93:24	wishes 48:21	11:19 37:3
88:23 92:24 100:1	warranted 90:18	136:5,6 144:21	withheld 98:25	written 10:3 36:2
102:3 107:12	wasn't 5:5 9:3,15	West 37:6 121:2,13	witness 4:14 6:6	45:6 46:25 100:20
111:6 116:11				

100:21 119:11 126:8 128:10,17 wrong 17:17 20:3 23:25 30:16 37:17 116:20,21 wrongly 71:24 wrote 8:19 57:16 68:24 116:19 129:1	1 8:20 10:1,6 36:25 57:16 65:11,13,14 65:15,17,17 160:5 1.30 77:19 97:8,12 1.38 97:15 1.43 61:5 1.58 113:13 1/220 10:2 10 10:8 23:5,10 29:20 38:21 40:5 64:10 65:18,21 113:23 114:6 116:4,4,5 124:22 136:11 10-minute 77:20 10,000 38:2 10.00 1:2 158:10 159:18,20 100 18:10 123:14 10th 80:21,24 144:22 11 19:12 50:10 129:13 11.33 61:5 11.36 159:6 11.40 77:22 113 160:11,12 115 61:9,17 12 78:10 12.00 77:24 12.30 12:4 77:17,18 97:13 13 35:5 55:23 152:23 159:21 130 160:13 131 160:14 133 160:15,16 14 50:11 154:6 15 64:10 109:15 116:4 125:21 15,000 3:14 159 67:22,25 68:1 16 40:6 135:1 163 69:3 164 61:10 69:14	164.78 61:20 165 69:25 70:3 166 70:13 17 40:8 68:3,19 82:6 146:11 155:11 18 45:1 69:14 100:24 111:15 138:6 147:12 19 78:14 1917 31:24 1990s 24:17 1992 31:9,20 1996 30:15 1s 65:16	2012/2013 21:5 2013 70:25 71:3 109:20 136:11 2015 38:18 50:10 2016 38:21,24 57:16 2017 1:1 159:21 21 159:6 22 10:14 91:2 109:20 220 10:9 224 74:3,5 226 101:1,5 228 101:12 231 150:4,5 232 8:20 24 110:24 242 87:13 249 65:11,13,15,17 65:21 252 66:6 256 66:10 257 60:18,24 259 109:15 26 25:17 27:6 111:14 261 112:16 264 135:2 27 68:21,23 109:1 271 66:4 272 66:14 28 41:14,19 65:24 80:17 82:12 28th 80:22,24 84:2 29 42:22 100:7 299 66:15	101:9 154:14 158:18 300,000 138:9 305 85:11 307 87:13 308 88:12 31 53:9 318 148:13 33 54:1 34 11:1 374 91:2 38,000 30:23
<hr/> X <hr/> X 160:3 <hr/> Y	<hr/> 2 <hr/> 2 10:16 90:20,22 97:22 123:14,16 160:6 2.03 113:15 20 9:13 38:18 44:14 45:10 111:14 125:21 155:12 200 127:2,13 2000s 24:17 2008 50:17 2009 15:20 51:12 74:6,13 2010 10:1 19:11 27:23 2011 9:10 65:24 89:6 110:24 111:14,20 135:21 137:12 138:2 139:1 2012 8:19 9:13 25:17 41:19 44:7 44:14 45:1 68:3 68:21 69:14 71:3 74:6,9 80:8,17 92:24 113:23 114:6 135:22 138:14 139:1,4 153:18 159:6	<hr/> 3 <hr/> 3 50:4,7,8 74:9 85:11 91:25 3.08 157:7 3.22 157:9 3.26 159:12 3.5 98:1 30 52:23 100:8	<hr/> 4 <hr/> 4 49:24 50:3,7,8 55:13 87:9,11,12 87:17,18,19 109:15 135:1 148:3 4.00 77:14 158:19 159:14 4.01 159:19 4.1 67:22 4.2 148:1 4.3 70:21 4.35 124:21 4.38 124:23 4.40 124:22 4.50 124:7,24 406 100:25 101:6 49 160:7 4simple 12:7	
<hr/> Z <hr/> zero 8:1 Zurich 149:13,22 <hr/> 0 <hr/> 1	<hr/> 5 <hr/> 5 52:24 60:18,24 98:4 110:17 123:16 136:17 5.1 74:3,5 5.22 61:6 500,000 97:20 50s 128:2 55 86:2	<hr/> 6 <hr/> 6 69:10 87:9,12,21 148:20		

6.15 61:2

61 86:16

69 51:10

7

7 38:24 123:22

76 160:8

78 160:9,10

8

8 61:2 70:25

8,000 38:2,12

8.5 98:4

81 61:10,25

872 50:14

873 49:23,25 50:4,9

877 21:7

886 107:4

8th 144:21

9

9 1:1

9.56 61:6

918 70:21

95 29:9