# OPUS2 

Manchester Arena Inquiry

Day 44

December 7, 2020

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paragraphs 2.1 to 2.3 of the inquiry's terms of
reference, which cover the following: 2.1, attack
planning and reconnaissance; 2.2, bomb preparation and
assembly, including, if applicable, relevant purchases,
attempted purchases and storage; and 2.3, the movements
of Salman Abedi and other relevant associates in the
lead-up to the attack.
As we explained when making our opening statement on
behalf of CTI, the spine of the evidence for this
chapter will be given by Mr Simon Barraclough, the
senior investigating officer for Operation Manteline,
the name given to the investigation into the arena
attack.
Before he is sworn, we should identify a number of
ground rules. First, Mr Barraclough's witness
statements run in total to 268 pages plus appendices.
His evidence addresses issues of relevance not just to
chapter 8 but also to chapters 13 and 14 , which, as
everybody knows, address radicalisation and
preventability. He will be recalled in chapter 13 to
deal with those issues. In our view, he should not be
asked questions about chapter 13 or chapter 14 issues
during this phase because to do so will be disruptive to
the structure of the oral evidence hearings, would waste
time and, moreover, Mr Barraclough has not been asked to

Monday, 7 December 2020
(9.30 am)
(Delay in proceedings) 3
( 9.54 am )
MR GREANEY: Sir, good morning. As will be obvious to
everyone, we're starting almost 25 minutes late.
There's no mystery in that. There has been a technical
difficulty, wholly unrelated to the evidence of
Mr Barraclough. Nonetheless, we apologise to you, sir,
and to all the core participants.
SIR JOHN SAUNDERS: I have been made aware of the technical
problems. They were very last minute. I'm very
grateful to those who have worked very hard to overcome
them and put alternatives in place, but equally the less
time we lose before we start in the mornings, the
better, particularly when people are ready to go.
MR GREANEY: I should emphasise, everybody was ready to go.
SIR JOHN SAUNDERS: I'm sorry as well to everybody. There
really were very serious technical problems, which have
been overcome, I'm grateful to say.
MR GREANEY: Sir, as I indicated on Thursday last week,
we are turning to chapter 8. In this chapter the
inquiry will focus upon the planning and preparation
undertaken by Salman Abedi and Hashem Abedi for the
attack on 22 May. We will therefore be addressing
(Delay in proceedings) 3
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prepare for chapter 13 and 14 issues for the evidence he will give this week.

Second, this inquiry, as we've just indicated, has set terms of reference and is not an investigation of the investigation, and, moreover, is not an investigation of whether different charging decisions could have been made in respect of some individuals.

Third, at the trial of Hashem Abedi, a number of individuals were the subject of orders made under section 46 of the Youth Justice and Criminal Evidence Act 1999, orders which prevented their identities being publicised.

A restriction order has been made to give effect to that order in these proceedings. That restriction order is, of course, available to all and, in particular, available to the press. I' II simply refer at this stage to paragraph 3, sir, of the order that you made, which is in the following terms. It prohibits reporting of the following:
"Reference to information which is capable of leading to the identification of the identity of a person, including but not limited to the witness's name, the witness's address, the identity of the educational establishment attended by the witness, the identity of the witness's place of work, any still or

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moving image of the witness, and information that may tend to identify family members."

So, sir, we need to make clear that those witnesses must be referred to, given that we are broadcasting these proceedings on YouTube, by cipher, and if it truly proves necessary to ask them questions that would tend to identify them or family members by way of jigsaw identification, CTI should be informed of that fact because those questions would need to be asked in a restricted session and we hope that is clear to everyone.

Fourthly, as will be perfectly obvious,
Mr Barraclough is aware of much operationally sensitive and national security sensitive material. Disclosure of that material publicly would be harmful to the national interest because it would assist terrorists to launch attacks and/or to make their attacks more deadly. The risk of inadvertent disclosure inevitably arises no matter how careful everyone is. But everyone will need to exercise a high degree of care in asking the questions they wish to pose, including CTI, and that of course also includes Mr Barraclough.

As a result, it may be the case that from time to time, Mr Barraclough, if we might put it this way, parks an answer in order to give consideration to get to

## whether it can properly be answered openly.

Fifth, the material underpinning the statements of Mr Barraclough is vast. As a result, from time to time, he may need to delay an answer in order to check the underlying material, and for that reason our breaks will be longer than usual at 30 minutes.

Sixth and finally, the main statement of Mr Barraclough is dated 27 August of this year and is divided into seven parts and I' II indicate how those parts are to be dealt with.

Part 1 deals with the initial investigation, including a high level summary of the whole investigation and I will deal with questions relating to that part. Part 2 relates to the device and its construction. Mr de la Poer will deal with that.

There are two things to mention dealing with those first two parts. Witnesses will be interposed during parts 1 and 2. The instructional video will be referred to but will not be shown. In our view, no image from the video should be shown on screen at any stage and certainly the video should not be named.

Part 3 relates to finances, and again Mr de la Poer will deal with that part of Mr Barraclough's evidence.

Part 4 relates to the investigation of Salman Abedi and Hashem Abedi and I will deal with that, although

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we will not reach that part until tomorrow.
Part 5 relates to persons of interest. Again, I will deal with that.

Part 6 of the witness statement relates to, as they are described in the statement, victims, but that part of the evidence will be addressed in chapter 12 and we will not be dealing with it during this phase.

Finally, part 7 of the witness statement addresses other areas of investigation, together with certain miscellaneous matters, and Mr de la Poer will deal with that.

Sir, that deals with all of the ground rules and introductory matters. Unless there is anything, sir, that you wish to say at this stage, I will call Mr Barraclough. subject to submissions being made to me. So I will obviously hear submissions if people wish to make them, if they want to go outside those ground rules. I think they should be aware that if that relates to identifying anyone who is subject to the order not to identify them, it may be necessary to go to Mr Justice Jeremy Baker for a ruling as well as they derive from his order, which remains in existence. But we'll deal with that if we need to. Obviously I will hear submissions if
people wish to contradict or go against any of the ground rules.
MR GREANEY: Thank you very much, sir.
At this stage, could Mr Barraclough please be sworn. DCS SIMON BARRACLOUGH (sworn) Questions from MR GREANEY
MR GREANEY: Would you begin, please, by telling us your full name?
A. Simon Justin Barraclough.
Q. In May 2017, and indeed until very recently indeed, were you an officer of Greater Manchester Police?
A. Yes, I was. I was a detective chief superintendent.
Q. And you no longer, I think, hold that role; is that because you recently retired?
A. I did, yes. I retired on the day that we received the verdict for Hashem Abedi.
Q. So I believe the position is that you could have retired earlier but you made a commitment to remain a police officer until that process and that trial had concluded?
A. That's correct, Mr Greaney, yes.
Q. But you have returned to work for Greater Manchester Police in the position of senior investigating officer?
A. That's correct.
Q. And it ought to be recognised that you have done so in order to support the process of this public inquiry?

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## A. Yes, that's right.

SIR JOHN SAUNDERS: We're all grateful and I'm sorry to interfere with your retirement.
A. Thank you, sir.

MR GREANEY: Your role, from very shortly after the arena attack and indeed to this day, was as senior investigating officer for Operation Manteline; is that correct?
A. That's correct.
Q. Is Operation Manteline the title of the operation which provided the investigative response to the arena bombing on 22 May 2017?
A. It is.
Q. How was that particular name for the operation selected?
A. It's a randomly generated word. It has absolutely no meaning. It is just the title of the operation.
Q. It's generated randomly by a computer?
A. That's correct.
Q. And as you say, means nothing. Is Operation Manteline a designated counter-terrorism investigation?
A. Yes, it is.
Q. Does it operate under the direction of Counter-terrorism Policing North-west and the National Counter-terrorism Network?
A. Yes.

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Q. Throughout the course of the investigation, have you had
    a line manager?
A. Yes, that's right: it 's Temporary Assistant
    Chief Constable Russ Jackson.
Q. I believe, having led the police operation since the
    night of the attack, there is something that you would
    like to say before you get into the substance of your
    evidence on behalf of yourself and on behalf of your
    team more generally.
A. I think that, put in the simplest terms, I would just
    like to say that from 22 May }2017\mathrm{ myself and my team - -
    and my team have asked me specifically if I could say
    this -- we have been wholly committed to this
    enterprise. Our best wishes and our condolences go to
    the families who have been most affected by this
    terrible atrocity, but also those people who have been
    injured in the atrocity. We are currently at a stage
    where there are 1,017 people who have been injured
    in the actual bombing, and throughout the }3.5\mathrm{ years
    we have conducted this inquiry, they have always been in
    our thoughts and prayers.
Q. I don't want to say too much about it, but Manchester,
    I know, is your home and the home for many of your
    officers?
A. It is, yes.
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Q. And the investigation has been a deeply affecting one for your team; is that correct?
A. Yes, that's right.
Q. Let's leave that and move on to ask some questions, please, about your own professional background.

Did you join Greater Manchester Police as long ago now as 1988 ?
A. That's correct.
Q. What has much of your service been spent dealing with?
A. Most of my police service has been investigating homicides and suspicious death. Latterly, I have been more involved in counter-terrorism investigations.
Q. We'll come on to that. During the course of your career, you received training which later became the SIO, senior investigating officer, development programme?
A. Yes, that's right.
Q. In March 2003, having received that training, were you promoted to the rank of detective superintendent?
A. Yes.
Q. Leading major incident teams?
A. Yes.
Q. With the job exclusively of investigating homicides?
A. Yes.
Q. In your statement you deal with the definitions and
descriptions of the role of the SIO at paragraphs 6 and
7. Those will be available for the chairman if that is necessary.

You've also, I think, received training in issues such as disaster victim identification ; is that correct?
A. That's correct, yes.
Q. Did there come a period when you left Greater Manchester Police to work elsewhere within the United Kingdom?
A. Yes. I served with the police service of Northern Ireland in Belfast.
Q. During what periods did you work there?
A. That was from 2005 to 2007.
Q. During your period in Northern Ireland, were you involved in counter-terrorism operations?
A. Yes, I was.
Q. I ought to say that within your first witness statement, that section of the statement is marked as operationally sensitive, but you've taken the view that it doesn't attract that description?
A. No, I don't think so. I think it was quite well-known that I held that position.
Q. In September 2010, were you appointed the head of the Greater Manchester Police major inquiry teams having returned to that force?
A. Yes, I was.

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Q. And thereafter, again did you devote your time almost exclusively to homicide investigation?
A. I did.
Q. Among other investigations that you were responsible for, were you responsible for the investigation into the murders and poisoning at the Stepping Hill Hospital in Stockport - -
A. That's correct.
Q. - - known as Operation Roxburgh? And moreover in 2012, did you undertake the duties of SIO for the dreadful murders of Constable Fiona Bone and Constable Nicola Hughes?

## A. Yes, I did.

Q. Having much earlier in your career been trained as an SOI, in December 2012 were you accredited to level PIP4, namely accreditation as a strategic crime adviser?
A. Yes, I was.
Q. And in very simple terms, and in a few sentences, what does that accreditation involve?
A. It effectively allows you to provide high-level advice to chief officers concerning complex major crime investigations, so you effectively can be the force adviser to a chief constable or his assistant with regard to the conduct of those enquiries.
Q. In March 2014 were you appointed to the role of head of
Q. And what did that particular role require you to do?
A. You effectively lead the investigations department,
which consists of four other senior investigating
officers, and each of those investigating officers
carries a workload of investigations relating to
counter-terrorism. So your role as the lead is to
manage that department and ensure that those officers
effectively have what they need to run those
investigations.
Q. So in short, therefore, your role as head of what is now CTP North - west required you to do two things. First of all, to coordinate and lead a team of other senior investigating officers?
A. That's correct
Q. And secondly, also personally to lead a small number of operations which you considered carried the greatest risk?
A. That's also correct.
Q. And all of the operations in both categories would be counter-terrorism operations?
A. Yes, they would.
Q. Although it would not perhaps be appropriate to go into

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the detail of them.
A. No.
Q. In July 2014 did you complete a course to train you as a counter-terrorism SIO?
A. I did.
Q. Again, in simple terms and a few sentences, what did that course involve training you in?
A. It effectively uses your experience as a senior investigating officer with regard to major crime and homicide and it familiarises you with the counter-terrorism world. So that includes things like relevant legislation, the organisation and structure of counter-terrorism within the UK and how that fits within an investigation, and how counter-terrorism investigations actually impact particularly on the communities that we serve and nationally.
Q. In June 2016, by which time you had been head of the counter-terrorism police in the north-west for a little over 2 years, did you attend the FBI post-blast investigation course in the United States?
A. Yes, I did.
Q. Did that follow attendance by you at several international bomb symposiums held in Germany to share experiences and learning around improvised explosive devices and explosives?
A. That's correct.
Q. So in short therefore, by May 2017, would it be reasonable to say that you were a highly experienced detective officer?
A. I think that would be reasonable, yes.
Q. With many years of experience not only of investigating homicide offences but also investigating terrorism offences?
A. Yes, I think that's right.
Q. Against that background, I'm going to turn to part 1 of your principal witness statement and so I'm not sure which divider in your bundle that will be at, I'm sure you'll find it fairly readily. I'm going to begin at paragraph 5 of that statement. This is the main statement dated 27 August 2020.

Everyone in this room and watching knows that Salman Abedi detonated his bomb at 22.31 hours on 22 May 2017. When did the criminal investigation into his actions commence?
A. It effectively commenced 2 minutes later, which was the first call to the police.
Q. And as the initial response to the attack was taking place, were counter-terrorism resources being mobilised in order to begin a terrorism investigation?
A. Yes.

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Q. When were you first made aware that there had been an attack at the arena?
A. I received a telephone call from Mr Jackson -- that was at $23.27-$ - and he told me that there had been a bombing at the arena and it was suspected that that was a suicide bombing.
Q. Did he explain that, bearing in mind your particular experience, he intended to appoint you as the counter-terrorism SIO?
A. Not in that telephone conversation, I think that was done a short time later.
Q. At all events, did you decide to mobilise?
A. Yes, I did.
Q. And did you go to a particular location that I won't identify?
A. Yes, I did.
Q. Arriving there shortly after midnight on 23 May?
A. Yes.

SIR JOHN SAUNDERS: Can we stop for one moment? You're quietly spoken, which is fine. I can hear you, but can I check everyone can hear all right?
A. I will try and speak up, sir.

SIR JOHN SAUNDERS: I don't want to make it uncomfortable for you, particularly if you're going to be there for 3 days, by having you speak very loudly. But just
occasionally, the sentences, at the end of them, the voice drops.
A. I understand.

SIR JOHN SAUNDERS: That's fine. There is nothing more irritating than when a voice goes up at the end of phrases, so just keep it reasonably confident, thank you.
MR GREANEY: I'm sure that those who are watching will raise a hand if they struggle to hear. Thank you very much.

We had reached a point shortly after midnight on 23 May, so about an hour and a half after the bombing. You have arrived at a location where the investigative response is being coordinated from, would that be fair?
A. That's correct, yes.
Q. And did you there meet with ACC Jackson?
A. I did.
Q. And what step did he take at that stage in relation to you?
A. That was the conversation that we had when I was asked to be the senior investigating officer.
Q. So within about 90 minutes of the attack, you had been appointed to that role?
A. Yes, that's correct.
Q. During the initial stage of the investigation, did you cover the night shift with Detective Chief Inspector 17

Pickering, from whom we've heard a number of times, as your deputy SIO?
A. Yes, that's correct, and that was for approximately the first 10 nights.
Q. Was the burden of the investigation such that effectively it had to run 24 hours a day?
A. It was a 24 -hour a day operation, yes, it was.
Q. So during the day shift when you were not working, who was covering the work that needed to be done?
A. That was Detective Superintendent William Chatterton and Detective Chief Inspector Andrew Meeks.
Q. Who had appointed those officers to those roles?
A. Again, that would have been Mr Jackson.
Q. And no doubt you can confirm that in appointing those officers to those roles, regard was had to the fact that each of them was working in North-west CTU, as it was known?
A. That's correct, yes.
Q. And each was trained and experienced as a counter-terrorism SIO?
A. Yes.
Q. Having worked in such roles for a number of years?
A. Yes.
Q. So essentially, Mr Jackson was putting together his most highly trained and experienced team; would that be fair?
A. Yes, I think that's fair.
Q. Initially, as you've explained, the investigation was managed within North-west CTU, but was it quickly recognised that assistance would be required from elsewhere in the country?
A. Immediately, and this involved the marshalling of large numbers of officers from all over the Counter-terrorism Network.
Q. Why was it thought necessary that assistance was required from elsewhere within the country?
A. Because this was recognised from the very beginning to be an extremely large investigation.
Q. So senior officers became assisted by a substantial number of other officers and staff from across the Counter-terrorism Policing Network; is that correct?
A. That's correct, yes.
Q. Including other SIOs who were given specific areas to oversee, for example in relation to CCTV?
A. That's correct, yes.
Q. Because, just to take that as an example, to harvest all of the CCTV relevant to this investigation was a mammoth task?
A. It was enormous, yes.
Q. And we've seen the product of it during the course of this inquiry and the jury at Hashem Abedi's trial

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of course saw the product of it, but we must not underestimate the amount of work that's gone into producing the compilations that we have seen; is that correct?
A. That is absolutely correct, yes.
Q. In the course of any investigation, terrorism investigation, no less this one, is it necessary for the CTSIO to set objectives?
A. Yes, it is.
Q. And did you set objectives in relation to Operation Manteline at 2 am on 23 May?
A. Yes, I did.
Q. Were they agreed by ACC Jackson?
A. Yes, they were.
Q. And recorded in something that we'll look at a little more in a moment called the CLIO log?
A. They were, yes.
Q. I' II identify what those objectives are and then ask you a small number of questions about them.
(1), identifying the continuing threat to public safety.
A. Yes.
Q. (2), to identify any further offenders who present an immediate threat or who have assisted the commission of the attack by any means.

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A. Yes.
Q. (3), identify the principal offender.
A. Yes.
Q. (4), secure the bomb scene and gather all available
    evidence.
A. Yes.
Q. (5), identify eyewitnesses and pursue relevant lines of
    enquiry.
A. Yes.
Q. (6), identify all victims and deploy FLOs, so family
    liaison officers, where appropriate.
A. That's correct.
Q. Would it be fair to say that the principal focus of the
        investigation at that stage was proactive, in other
        words to prevent a further attack as opposed to
        reactive, so to identify and investigate who had done
        what?
A. I think both, in truth. So whilst there is an ongoing
        investigation that starts immediately, the slight
        difference with a counter-terrorism threat is that it is
        recognised that, for example, if you take the Paris
        attacks, it is highly possible that there will be
        further attacks, so having experienced the bomb going
        off, there was a very real concern that there may be
        other attacks and also there was a real concern that
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    there may be outstanding explosives. So you're right in
    saying the main concern is protection of life and
    preventing any further killings from that point.
Q. You're quite right, it's both things at that stage.
A. Yes.
Q. But what will inevitably be of particular importance
    will be to ensure, so far as possible, there is no
    further attack and also to secure any other explosives
    that may be in existence within the community?
A. That's correct, yes.
Q. I believe that at 03.21 hours on 23 May, the second and
    sixth of those objectives were updated?
A. Yes.
Q. With objective 2 being updated to read as follows:
            "Identify any further offenders who present an
        immediate threat or have assisted the commission of this
        attack by any means and to arrest such individuals and
        secure evidence where available."
A. Yes.
Q. As we're going to see, there were a substantial number
        of individuals who were arrested; is that correct?
A. Yes, that's correct.
Q. Objective 6 was then updated to read:
            "Identify all victims and support GMP in the
        disaster victim identification or DVI process."
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A. Correct.
Q. And DVI is a recognised process which is brought into effect following an outrage of this type?
A. Yes, that's right.
Q. And in which you yourself, I think, had received some training?
A. That's right, as a senior identification manager.
Q. Did you personally set your investigative objective for the operation at an early stage as being to continue to search for the truth in order to bring to justice all those responsible for the atrocity and to answer all the questions that might be posed by the victims and/or others affected?
A. Yes, that's correct.
Q. I said that we would return to the CLIO logging system and, again in very simple terms and shortly, could you describe what that system is, please?
A. It's a very simple process. It's effectively just a logging system, so it will work contemporaneously and record any information that you think is relevant with regard to an investigation or indeed an ongoing policing operation. So that would include things like decision-making, key actions, key policies. Everything goes into that log and is timed, dated and effectively contemporaneously recorded.

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SIR JOHN SAUNDERS: Does that replace what used to be the SIO's policy book?
A. Not necessarily, sir. They can run simultaneously, but clearly in response to an incident such as this, it is, I would suggest, impossible to keep an SIO policy book. So you are literally throwing all those decisions on to the CLIO log with the loggist who records that.
SIR JOHN SAUNDERS: Thank you.
MR GREANEY: So is this a reasonable way of summarising it: that obviously in the immediate aftermath of an outrage such as this, events will be moving very quickly, decisions will need to be made on a minute-by-minute basis if not faster?
A. Yes.
Q. And CLIO is a simple and straightforward logging system which enables what is occurring to be captured?
A. Yes, that's right, and of course it does allow you to then look back over that log and make sure that any work that should have been done has been done.
SIR JOHN SAUNDERS: Do you have a dedicated loggist who records what you're saying, basically?
A. You may have several, sir. There's so much happening that recording this information can be a full-time process for several loggists.
MR GREANEY: I should say, during the course of ILT's work,

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    we have seen the CLIO log.
SIR JOHN SAUNDERS: Thank you.
MR GREANEY: Was the CLIO system, as is common, used only
    during the early stage of the investigation, namely
    between 0106 hours on the 23rd and the last entry being
    15.19 hours, and in your statement you say 19 June;
    is that the correct date?
A. I think that's correct, yes.
Q. Subsequently, were other computer systems, perhaps more
    sophisticated systems, used depending on the nature of
    the information?
A. Yes, that's right. So at this stage, the system
    migrates into HOLMES, which is the Home Office Large
    Major Enquiries System. That is a standard piece of
    software that we would use in relation to managing any
    murder enquiry.
Q. So this is now a long-established system, which has
    probably existed for 30 years, but in various
        iterations?
A. Yes.
Q. The senior investigating officer or other senior
    officers can generate actions, as they are called, which
    are logged on the system?
A. Yes.
Q. Those are allocated to particular officers who then
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    produce reports or results?
A. Yes, that's right. But the main thing with HOLMES
    is that it is a searchable database.
Q. And it is really designed to ensure that opportunities
    are not missed and that what ought to be done is done?
A. Yes, that's right.
Q. In its early stages, it was learning the lessons of
    police investigations which were considered to have gone
    badly wrong, in particular the investigation into what
    were called the Yorkshire Ripper murders?
A. Yes, that's why it's important that it's searchable. But just to refer back to the CLIO log, the CLIO log is effectively is absorbed into HOLMES so again nothing within that should be missed.
Q. So I believe it would be right to say that the HOLMES system is used for what might be described as overt material?
A. Yes, on the whole, although it can be used for secret material as well.
Q. And is designed so that if there is a prosecution, the material on HOLMES can rapidly be translated into the criminal justice system?
A. Yes, it can.
Q. Although I appreciate that some closed material or covert material may be on HOLMES, but would it be
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reasonable to say that in relation to intelligence material, another system that we won't describe will also be utilised?
A. Yes, that's correct.
Q. In the early stages of your investigation were the SIO teams, because there were a number of them, based in a particular room known as the fusion cell?
A. Yes, that's right.
Q. What was the fusion cell?
A. The fusion cell is basically an extremely large means of gathering information and intelligence in one place, assessing that information and intelligence, and then driving an investigation through actions from that base. So it forms the core of the investigation that's ongoing and it forms the core of any intelligence - gathering operation post-attack in this case.
Q. I'm going to turn in a moment, as I promised I would, to seek from you a high level summary of what your investigation revealed, but still dealing with the structure of the investigation at the moment, in those initial phases of your investigation, as we will come on to describe in detail, were you concentrated, among no doubt other issues, on the identity of the bomber and the identification of anyone who may have assisted him or been in contact with him in the period before the

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attack?
A. Yes, that's right.
Q. Did that lead to a total of 23 arrests under the Terrorism Act?
A. Yes, it did.
Q. And the searching of 42 sets of premises and 18 vehicles?
A. Yes.
Q. During that stage did you recover a total of 930 digital media devices?
A. Yes, we did.
Q. So phones, tablets and the like?
A. That's correct, yes.
Q. Under which provision or provisions did you arrest those 23 people?
A. That was under section 41 of the Terrorism Act 2000, which is being suspected of being concerned in the commission, preparation or instigation of an act of terrorism.
Q. Does that legislation allow for an arrested individual to be detained for up to 14 days without charge, albeit with regular reviews in place to ensure that the ongoing detention is necessary and justified?
A. That's correct, yes.
Q. An important issue that we'll need to bear in mind as we

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    come on to look at parts 4 and 5 of your witness
    statement, which will be tomorrow, is that your role was
    to investigate, not to make the charging decision or
    prosecute; is that correct?
A. Yes, that's right.
Q. The decision as to who was to be prosecuted and what for
    and thereafter to conduct the prosecution rested with
    the Crown Prosecution Service; is that correct?
A. Yes, that's correct.
Q. And more specifically with the Crown Prosecution Service
        Counter-terrorism Division?
A. Yes.
Q. In the course of your investigation, did you work
    closely with the Crown Prosecution Service?
A. Yes, very closely, and unusually in this case a total of
    three lawyers from CPS were actually deployed to
    Manchester. They worked with our teams throughout this
    whole process of 22 of the 23 arrests in order to assess
    that evidence and whether or not there was any potential
    for a charging decision.
Q. So when we look, as we will do, at others that were
    arrested and who have not been prosecuted, should we
    bear in mind that your team worked closely with the CPS
    from an early stage?
A. Yes, that's right.
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Q. How early on was their liaison with the Crown Prosecution Service?
A. This was within --I think they were deployed within a couple of days up to Manchester. The liaison with the Crown Prosecution Service would have started the very next day, so that would have been the 23rd, but their deployment was a couple of days later.
Q. So we should bear in mind liaison from within 24 hours?
A. Yes.
Q. The liaison involved three lawyers, co-locating with your team in Manchester?
A. Yes, that's right. So two lawyers who principally looked at the evidence and there was a dedicated lawyer to look at the warrants of further detention and obviously assess whether they should be applied for and whether that was being done in a lawful and proportionate manner and in order, really, to provide that first stage before judicial oversight with regard to the 14 days in custody, which is clearly a very important factor with counter-terrorism legislation.
Q. Should we also bear in mind when we look at decisions that were made that these were experienced and specialist lawyers from the Crown Prosecution Service?
A. Yes.
Q. And, moreover, that in due course extremely experienced
leading counsel were instructed also to advise?
A. Yes, that's correct.
Q. In short whilst, of course, the content of the discussions that you and your team had with the Crown Prosecution Service and counsel about those who were arrested is privileged and must therefore remain confidential, would you wish to assure us, the bereaved families and indeed the public, that all of those decisions were made at meetings with senior lawyers of the CPS and extremely senior and experienced barristers?
A. Absolutely, yes.
Q. And were not made quickly but were made after the result of the most careful consideration?
A. No, and indeed this process continued right through the trial of Hashem Abedi and there has been liaison after as well.
SIR JOHN SAUNDERS: It may be we're going to deal with this later, but is it material to state that the terrorist legislation investigator or appointee, Max Hill at the time, also reviewed what went on at this stage in a report?
MR GREANEY: I'm sure that is relevant for us to note and we will get on to that.
SIR JOHN SAUNDERS: And there is a report that he has produced and it is in the public domain.

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MR GREANEY: There is a report and we will, later on in the evidence of the SIO, be getting to that because Mr Hill has assisted us with the provision of certain information which was known to him but not necessarily to us at that stage.
SIR JOHN SAUNDERS: Thank you.
MR GREANEY: There came a time, as we'll see, at which the other suspects who had been arrested were released; is that correct?
A. Yes, that's right.
Q. Which was to come in early June. Did that mark in a sense the end of a phase of the investigation, or would that be putting it too high?
A. In a sense, yes, it did in a sense. But I think it's almost a -- it would suggest that the investigation comes to some sort of pause at that stage and that's just not the case.
Q. No, my question wasn't designed to suggest that, but no one will have difficulty in understanding that a major investigation like this has a number of different phases.
A. Yes.
Q. Here we have a phase during which you're seeking to identify the bomber, which, as we'll see, happened at an early stage, and you were seeking to identify others who

> may have supported the bomber.
> A. Yes.
> Q. Now you've reached a point in early June when others who have been arrested have been released without charge and it would seem that that marks the end of a phase of the investigation, albeit not one that results in a pause; is that a fair way of putting it?
> A. I think it is, but in a way I don't think it accurately reflects how I feel about that in that I think our investigation continued throughout the 3.5 years. It almost isn't a pause because, even on release, the investigation of all these subjects and their conduct, the part that was being played by everybody in the story of this offence, those enquiries have continued and still continue. So I understand what you're saying, Mr Greaney, and I do agree with that, but it has genuinely been an ongoing process for 3.5 years.
> Q. I believe I've understood and that what you're communicating is there doesn't come a day on, let's say, 6 June when people are released from custody and that is an end of it; you continue to see where the evidence takes you and if the evidence reveals a further case for someone to address then they will have to address that case?
> A. Yes, absolutely.

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Q. And indeed, as we're going to see --I have said that a lot and I' II say it a lot more, no doubt -- there remain people that you wish to speak to?
A. Indeed that's the case, yes.
Q. At any rate, however, whilst understanding everything you've said, once the last suspect had been released, did that have an impact upon the size of the team?
A. Yes, it did. It allowed us to reduce the management structure around this team and we were no longer needing to operate on a 24 -hour basis.
Q. The way in which you put it in your witness statement, paragraph 18 , is that:
"Once this early stage of the investigation was over, after the release of the last suspect, it was only necessary to have one SIO team, which consisted of me as SIO and DCI Pickering as deputy SIO. This was because the investigation was no longer a 24 -hour, 7 days a week operation, and the focus had shifted from proactivity and public safety towards a reactive investigation."
A. That's correct, yes.
Q. So just so we're clear about this, this was nothing to do with a limit being placed upon resources, this was simply reacting to the changing needs of the investigation?
A. Yes, and any investigation such as this will work much
Q. How did you achieve that in practice?
A. We would have a very regular briefing regime, which would encompass the entire team and sometimes that would have to be split because of the size of the team.
We would have briefings around specific areas of investigation as well with the team leaders and the

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teams that would be engaged in that work.
Q. Were all decisions either undertaken by you or taken by others ratified by you and logged either on the HOLMES system or in a document the chairman's referred to, namely your policy book?
A. Yes, that's right.
Q. In your witness statement, you deal with policy books in general terms in paragraph 20 and that information will be available for the chairman if it's relevant for the purposes of his report.

Separately, did something called an identification commission come into existence as part of the investigation?
A. Yes, it did.
Q. Who was responsible for that?
A. That was the responsibility of HM Coroner. The lead coroner for this was Mr Meadows.
Q. Was that set up, in very simple terms, to manage the formal identification of each of those who had been murdered in the attack?
A. Yes, that's correct.
Q. As the work of the coroner's identification commission came to its end, what happened in terms of the investigation?
A. In terms of the deployment of family liaison officers?
Q. Yes, that's what I had in mind.
A. The family liaison officers, when they're initially deployed, particularly within a DVI process, are very much there with regard to the identification process, to support the families through the identification process.
Q. So these are police officers?
A. They are police officers, yes.
Q. Appointed at an early stage --
A. That's right.
Q. -- as part of the identification commission initially to address matters of identification?
A. Yes.
Q. But obviously, there comes a point and did come a point in this case where the process of identification is complete and so what becomes the role of the FLO at that stage?
A. The FLO effectively is a conduit to bereaved families from the investigation. So where I need to communicate information to them or they need to communicate information back to the investigation, the FLOs act as the interface for that process.
Q. Was there a particular officer who was in charge of the FLO team in this investigation?
A. Yes, that's right, that was DCI Lamb.
Q. DCI Theresa Lamb.

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Still dealing with the structure of the
investigation, is disclosure a particularly important process in circumstances in which it is expected to prosecute an individual or individuals?
A. Yes, it's extremely important.
Q. How was that handled by your investigation?
A. This is indicative of the size or the scale of material that was being handled by the investigation, but the team that was appointed was substantial, it was eight disclosure officers and deputy disclosure officers who then catalogue all of the information within the enquiry on to particular schedules, which will be disclosed when a prosecution case is engaged.
Q. Was the disclosure process, as set out and managed, agreed with the Crown Prosecution Service throughout?
A. Yes, it was.
Q. I don't believe it's necessary to go into that in any further detail.

I' II turn to receive your high-level summary of the investigation. It is important that we should have an idea of the scale of it and I'm now at paragraph 25.

During the initial stages of Operation Manteline, did an estimated 1,000 police officers, police staff and National Crime Agency officers from across the entire country work on the investigation?

## A. They did, yes

Q. It may be that some viewing these proceedings don't have much of an idea of what that means in terms of scale, but how would that compare with other investigations?
A. It's colossal. That is a colossal number of officers and staff coming into work with one enquiry. I would suggest that's certainly one of the biggest police responses to a major crime that certainly I've ever seen in my career.
Q. Did those officers and other individuals assist in carrying out over 16,000 actions?
A. Yes.
Q. Recovering or seizing more than 17,000 exhibits?
A. Yes.
Q. And as at the date of your statement, there will be more now, taking more than 4,000 statements?
A. Yes.
Q. Furthermore, in total, have more than 20,000 documents been produced during the course of the investigation?

## A. Yes, far more.

Q. Next, and we're still at part 1 of your witness statement, your high-level summary of the investigation, dealing with its scale and scope and the broad conclusions that it has reached.

As I have indicated, this will be high level and

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we'll delve into the detail of it in addressing further parts of your report.

As we all know, at 22.31 hours on 22 May, whilst in the City Room, Abedi detonated his improvised explosive device, and as a result killed 22 people, about whose lives we heard at an earlier stage in these proceedings, and injured hundreds of others.
A. Yes, that's right.
Q. In the very early stages, was an assessment and search of the scene carried out?
A. Yes, it was.
Q. No doubt that had to be undertaken with great care so as to preserve evidence?
A. Yes, that's correct.
Q. At that very early stage, was the body of the suspected attacker identified near to the seat of the explosion?
A. Yes, it was.
Q. And therefore close to the arena box office?
A. Yes.
Q. Could I indicate through you to those who are watching, both in the room and who are watching remotely, that we are not going to be going into detail about those who were killed or injured, but we will be going into some detail in due course, at any rate, of how it was that you were able to identify Salman Abedi as the bomber; is

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    that correct?
A. Yes.
Q. Which will involve detailing certain medical
    interventions in relation to him. I simply mention that
    so if anyone feels they might get distressed about that
    detail, they do not need to watch this part of the
    proceedings.
            But found close to the body of that person, who
        turned out to be Salman Abedi, did you recover, or at
        any rate, a member of your team recover a bank card?
A. Yes, that's right. A Halifax bank card in the name of
        Salman R Abedi
Q. Furthermore, and we'll come to the detail of this
    tomorrow, I expect, did facial recognition evidence
    support the fact that Abedi was the bomber?
A. Yes, that's correct.
Q. And thereafter did DNA and fingerprint profiling support
        that fact?
A. Yes, it did.
Q. I think, even to the extent of comparing teeth, that
    step was taken in order to check that he was indeed the
    bomber?
A. Yes, it was.
Q. As your investigation progressed, did it become apparent
    that there was evidence indicating that Hashem Abedi,
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the brother of Salman Abedi, had assisted in the planning and preparation for the attack?
A. That's correct, yes.
Q. As a result, what step was taken at that early stage in relation to him?
A. It's actually recorded as 11.30 hours on 23 May that Hashem Abedi is declared a suspect.
Q. Very quickly afterwards, did reports start to appear in the British media about Hashem Abedi?
A. Yes, they did.
Q. Were those reports to the effect that he had been detained whilst in Libya?
A. That's correct, yes.
Q. And in due course, was that confirmed by the Foreign and Commonwealth Office?
A. Yes, it was.
Q. Did Hashem Abedi remain in custody in Libya before he returned to the United Kingdom on 17 July 2019?
A. As far as I'm aware, yes.
Q. Was his return the result of extradition proceedings between the United Kingdom and Libya?
A. That's correct, yes.
Q. In which both your team and the Crown Prosecution Service had been engaged?
A. Yes.
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Q. Was Hashem Abedi charged with the murder of 22 people?
A. Yes.
Q. The attempted murder of others who survived?
A. Yes.
Q. And with conspiring with Salman Abedi to cause, by an explosive substance, an explosion of a nature likely to cause serious injury or damage to property?
A. Yes.
Q. Once Hashem Abedi was back in the country, was there a desire on the part of your team to interview him?
A. Yes, there was.
Q. And did such an interview take place?
A. It did, yes, under section 22 of the Terrorism Act.
Q. Did he answer questions?
A. He refused to answer questions. However, he prepared a pre-prepared statement.
Q. We'll just look at two paragraphs of that prepared statement on the screen: CPS000043 - - forgive me, it's $\{$ CPS000207/1\}. The earlier reference was the interview transcript.

This is the typed version of his prepared statement and again, so that those who aren't familiar with the criminal process can understand, what happens is that a statement is prepared with the assistance of his solicitor setting out his position. It is then read

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out, usually by the solicitor. Is that what happened in this case?
A. I'm not sure, actually. I'm not sure whether it was read out. I' m not sure whether it was just handed over.
Q. Sometimes it's just handed over. At all events, this was supplied to the investigation and then he refused to answer any questions, either generally or based upon the statement that he had provided?
A. That's correct, yes.
Q. Paragraph 2:
"I deny any involvement in the terrorist attack at the Manchester Arena on 22 May 2017. I was not involved in the instigation, preparation or commission of it. The first I heard of it was on 23 May, a few hours before I was arrested by the FTS in Libya. Had I had any idea of it, I would have reported it to my mother initially and then to other family members to prevent it from happening. I was shocked my brother had done this and felt bad for everybody. I could never have envisaged that my brother had it in him to do this to innocent people."

And then I'll read out paragraph 3:
"I am a practising Muslim. I do not hold [he claimed] extremist views. I do not delve too deep into anything other than pray and read the Koran. I have no

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    interest in Daesh and have no sympathy or support for
    their ideology and extremism. I did attend the mosque
    from time to time and wear traditional clothing at the
    time of visiting the mosque but this was not in support
    of ISIS but to practice my religion. I am not a member
    of ISIS nor do I subscribe to their way of thinking or
    ideology."
        So that was the statement that was either read on
        his behalf or, more probably, handed over.
SIR JOHN SAUNDERS: And FTS stands for?
A. This is effectively the militia that held him.
SIR JOHN SAUNDERS: Thank you.
MR GREANEY: We've understood that the militia that held him
        was the RADA Defence Force. This may be a different way
        of describing it?
A. It may be. I can check for you, sir, if you wish.
SIR JOHN SAUNDERS: Thank you.
MR GREANEY: Effectively, he was denying being an extremist
        holding pro-ISIS views, he claimed that he had played no
        part in planning or preparation for the attack, and that
        it had been a shock when he discovered what his brother
        had done. And indeed, he was to conduct his trial on
        that basis?
A. Certainly initially, yes, that's correct.
Q. There came a time when it might be suggested he
Q. There came a time when it might be suggested he
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disengaged and didn't give evidence and so on, but
initially, I'm sure you'll be able to agree that from
the base upon which his case was conducted, he was
denying that he had played any part in the planning and
preparation?
A. Yes, I completely agree.
Q. You, I think, are aware that on 22 October of this year,
in prison, serving his sentence, Hashem Abedi was
interviewed by member of the inquiry legal team?
A. Yes, I am.
Q. When I say members of the inquiry legal team, I mean
Mr de la Poer and Mr Suter?
A. That's right.
Q. And you, I know, are aware and the core participants are
aware, but this will be news to others, that on
22 October during the course of that interview,
Hashem Abedi admitted that he had played a full part and
a knowing part in the planning and preparation for the
arena attack?
A. Yes, I think that's a fair summary.
Q. So there is no doubt now that your team's prosecution of
him and the Crown Prosecution Service prosecution of him
was entirely well-founded?
A. It was and there was no doubt in my mind.
Q. So the point you're making is that it didn't need him to

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disengaged and didn't give evidence and so on, but the base upon which his case was conducted, he was denying that he had played any part in the planning and preparation?
A. Yes, I completely agree.
Q. You, I think, are aware that on 22 October of this year, in prison, serving his sentence, Hashem Abedi was interviewed by member of the inquiry legal team?
A. Yes, I am.
Q. When I say members of the inquiry legal team, I mean Mr de la Poer and Mr Suter?
A. That's right.
Q. And you, I know, are aware and the core participants are aware, but this will be news to others, that on 22 October during the course of that interview, Hashem Abedi admitted that he had played a full part and a knowing part in the planning and preparation for the arena attack?
A. Yes, I think that's a fair summary.
Q. So there is no doubt now that your team's prosecution of him and the Crown Prosecution Service prosecution of him was entirely well-founded?
A. It was and there was no doubt in my mind.
Q. So the point you're making is that it didn't need him to
tell you that you'd got it right?
A. I think we'd got there with the trial, but these things help, I think.
Q. Did the investigation establish that Salman Abedi and Hashem Abedi obtained the precursor chemicals for the construction of the IED between January and April 2017?
A. Yes, that's right.
Q. And furthermore, did the investigation, in particular by your financial investigators, reveal that the pair had taken steps to attempt at least to distance themselves from the purchase of chemicals, namely hydrogen peroxide and sulphuric acid?
A. Yes, that's right.
Q. And that the means by which they had sought to distance themselves was by using the bank accounts of associates in order to purchase materials required to construct the IED?
A. Yes.
Q. Again, we're going to come on to look at some of the detail of that in due course.

Of those who were arrested, the 23 who were arrested in the aftermath of the attack, were any of those whose bank accounts had been used among them?

## A. Yes.

Q. In short, were all, or at any rate most, of the

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associates and family members who had purchased such materials declared suspects?
A. Yes, they were.
Q. And subsequently arrested?
A. Yes, they were. Not all were arrested, but attempts were made to arrest all of them.
Q. That remark you have just made, which is entirely accurate, we will explain in due course.
A. Yes.
Q. To deal with their accounts globally at this stage, did their accounts show that they claimed that they had been either told that the chemicals were required to top up a car battery?
A. Yes, that was consistently the case with purchases of sulphuric acid.
Q. Or were required for sending on to Libya in order to fill a large battery powering a generator at the Abedi family home?
A. Yes, that's right.
Q. Has very careful consideration been given by your team and the Crown Prosecution Service to whether their denials of knowing involvement are reliable?
A. Yes, very careful consideration has been given.
Q. Again, I' II emphasise that the content of your discussions with the Crown Prosecution Service, for very

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    good and long -- on the basis of long-established
    principles must remain confidential, but everyone should
    understand that those denials have not simply been
    accepted but have been carefully scrutinised?
A. And carefully investigated.
Q. In all, was it revealed by your investigation that the
    brothers had purchased, through that route, at least
    16 litres of concentrated sulphuric acid?
A. Yes, that's right.
Q. And some 55 litres of hydrogen peroxide of a particular
    strength that we will not give?
A. That's right, yes.
Q. It is well-known that there is a third key ingredient,
    nothing sensitive about this, namely acetone, but has
    your investigation not identified the source of acetone
    for the killers?
A. No, but of all three chemicals, the acetone is very easy
    to get hold of. You can literally buy it in any number
    of stores.
Q. Yes. For example, and again I'm giving no secrets away,
        it's a key ingredient in nail polish remover?
A. Yes.
Q. So as you say, not difficult to get hold of. So those
    three chemicals were obtained by the Abedi brothers.
    Did your investigation reveal that those chemicals were
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    used by the Abedis to manufacture
    triacetone triperoxide?
A. Yes, that's right.
Q. Which is commonly known as TATP?
A. Yes.
Q. And is a high explosive, sensitive to detonation by
        friction, impact, heat or spark?
A. That's correct, yes.
Q. And once manufactured, is TATP highly sensitive and
        unpredictable, such that it can easily detonate?
A. Yes, very highly.
Q. We've spoken so far on a number of occasions about
    others who were identified as suspects and arrested
    under section 41 of the Terrorism Act. Have any charges
    been brought against those individuals?
A. Not under the Terrorism Act, no.
Q. I think you've probably expressed yourself in those
    terms because there have been a small number of other
    prosecutions for offences which have been revealed by
    your investigation but are not terrorism offences?
A. Yes. I took the view that any offences that were
disclosed through the investigation, through this
    investigation, should be properly pursued. So where
    there is evidence in relation to any other offending,
    that has been referred to by the CPS.
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Q. When we reach part 5 of your statement, we will identify where such points arise in relation to a particular individual

What we've understood is there has been an investigation of the size, scale and extent that you've just described. Evidence obviously has been generated. That evidence has been considered by your team and by the Crown Prosecution Service, and applying the code for Crown Prosecutors to which Mr Cooper referred earlier in the case, a decision has been made that there should be no prosecution of those individuals as matters stand?
A. That's right.
Q. We dealt with the acquisition of the chemicals and whether any of those who had been used to obtain them had been prosecuted. Did the investigation also reveal purchases made by both Hashem and Salman Abedi of other component parts of the device?
A. Yes, it did.
Q. Namely nuts, cross dowels, nails and screws?
A. Yes.
Q. And also the purchase of other equipment required for the manufacture of the device?
A. Yes.
Q. And indeed for the carrying of the device?
A. Yes, that's correct.

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Q. Was a key part of your investigation not only identifying individuals who may have assisted but also identifying where, for example, the TATP had been manufactured and, moreover, where it had been stored if somewhere different?
A. That's correct, yes.
Q. Did the investigation identify a number of relevant addresses in the Manchester area?
A. Yes.
Q. To deal with them in turn, was one such address a flat at 74 Somerton Court?
A. Yes, it was.
Q. Were both brothers to be linked to that address both by fingerprint evidence and DNA?
A. Yes, they were.
Q. Were traces of TATP identified at that flat?
A. Yes, they were.
Q. And in simple terms at this stage, bearing in mind we'll turn to it in further detail in due course, what did your team conclude 74 Somerton Court had been used for?
A. 74 Somerton Court was effectively where the TATP was made, so the explosive material was made in that flat.
Q. Was a second address that was proved to be of relevance 44 Lindum Street in Rusholme?
A. Yes, it was.
$\begin{array}{lr}\text { Q. In March of } 2017 \text { was the occupier of that address away } & 1 \\ \text { from home and in Libya? } & 2 \\ \text { A. Yes. } & 3 \\ \text { Q. What did the investigation reveal that address had been } & 4 \\ \text { used for? } & 5 \\ \text { A. So this address was used on a number of occasions as } & 6 \\ \text { a delivery address, so when it came to chemicals they } & 7 \\ \text { were delivered to } 44 \text { Lindum Street. } & 8 \\ \text { Q. So the two addresses that we've mentioned so far, } & 9 \\ \text { neither was the home address of the Abedi brothers? } & 10 \\ \text { A. No, they were not. Again, I know this is high level, } & 11 \\ \text { but } 74 \text { Somerton Court was effectively rented and } & 12 \\ \text { 44 Lindum Street was effectively loaned to the Abedi } & 13 \\ \text { brothers. } & 14 \\ \text { Q. So the point in relation to Lindum Street is that the } & 15 \\ \text { attackers were not utilising their home address for the } & 16 \\ \text { delivery of the substances, they were using another } & 17 \\ \text { address? } & 18 \\ \text { A. Yes, that's correct. } & 19 \\ \text { Q. So distance was being placed between them and the } & 20 \\ \text { acquisitions, not just by using family and friends but } & 21 \\ \text { also by using an address that they were not immediately } & 22 \\ \text { connected with? } & 23 \\ \text { A. Yes, that's correct. } & 24 \\ \text { Q. The third address that I would like to ask you about at } & 25\end{array}$
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this stage is Devell House. Again, that's an address in Manchester in common with the other two. What was proved to be the relevance of that address?
A. Devell House is effectively a small block of flats, and attached to that block of flats is a car parking area for exclusive use of the residents, and that's gated. Within that car park area we found a Nissan Micra, which was key in the investigation in that the Micra was used for storage of the TATP once it had been manufactured at Somerton Court. So it was transferred from Somerton Court to Devell House and stored within that Micra vehicle. This is particularly important when we move on to look at the travel of the Abedi brothers and Salman Abedi's subsequent return on 18 May.
Q. I will ask you about that travel, again at a high level, in just one moment, but it's perhaps useful to get this issue out of the way at this early stage, although I dare say you'll need to return to it. When we get to part 5 , we're going to see, aren't we, that there were occasions, captured on CCTV footage from Devell House, upon which particular individuals who are not either of the Abedi brothers appear to go to the Micra in which the TATP was being stored whilst it was at Devell House?
A. Yes.
Q. I appreciate you'll need to take care in how far you go
in answering this question, but should we attach importance, or at least too much importance, to the fact that those people appear to visit that car? It's a rather clumsily expressed question, but do you know what I'm driving at?
A. Yes, I do. I think without going into -- because this is high level -- any of the detail, I think it's important to understand that when we as an investigation came to seize the Micra, that set off a parallel investigation in regard to another vehicle that was parked in that car park concerning a conspiracy to supply class A drugs. That investigation itself involved a number of people who have also been of interest to us in our enquiry and some of those people were the same people who actually looked inside or appeared to look inside the Micra and were caught on CCTV when they did so.

In other words, when we come on to talk about those TIEs, those TIEs, yes, looked inside the Micra. We needed to know why they'd done that, but actually there may be an explanation to that in that we know that there was drug dealing going on from those premises, and it was of a significant scale.
SIR JOHN SAUNDERS: When you say looked inside, do you mean opened the car and looked inside or looked through the

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window?
A. No, looked through the window, sir.

SIR JOHN SAUNDERS: Thank you.
A. And again, that seems to make sense because if you're dealing in drugs and you're using a vehicle to store those drugs, it is highly likely that you'd be interested in other vehicles that had been parked in a particular spot for some time.
MR GREANEY: Just to make sure this is completely understood, and I'll express myself with care as well, TIE is "trace, interview, eliminate" or "trace, interview, evaluate", depending on your age?
A. That's right.
Q. These were particular individuals, as we'll see, the investigation looked at.

On a number of occasions such a person had looked inside the Micra and the point that you're making is that it is not or not necessarily a safe inference that that person must have known what was in the Micra and that there is at least one other credible explanation for why they may have done so?
A. Yes, yes, there is. Where there has been some crossover in this is some of that information, so the information that we have held as an investigation, has then been used in the prosecution of those drugs offences.

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Q. Absolutely, and we'll see that there has been certainly
    one prosecution.
            We paused for a moment in looking at the
        significance of the Micra. In simple terms, the Micra
        was purchased on the evening of 13 April; is that
        correct?
A. Yes, that's right.
Q. From a man called Nathan Grice?
A. Yes.
Q. Who, when the sale was made, was present with two
        friends of his, James Keighron and John Keighron?
A. Yes.
Q. Am I right in my recollection that certainly
        Nathan Grice was one of those arrested initially ?
A. Yes, that's right.
Q. But was entirely excluded?
A. Yes.
Q. The purchase was made on 13 April. You mentioned the
        travel of the Abedi brothers and we'll just summarise
        what the position was at this stage so we can understand
        where the Micra comes into it.
            In April, were Salman Abedi's parents and younger
        siblings in Libya?
A. Yes, they were.
Q. On 1 April 2017, were flights booked for them to return
5 7
    to the UK from Libya?
A. Yes, that's correct.
Q. Arriving in the UK on 6 April, but then departing again
        for Libya on 15 April?
A. Yes.
Q. Did the investigation reveal that a week later, so
        a week after 1 April, the older brother of Salman and
        Hashem, Ismail Abedi, about whom I'm going to ask you
        a number of questions in due course, purchased two
        single airline tickets?
A. That's correct, yes.
Q. Did he, Ismail, purchase airline tickets and
        Salman Abedi and Hashem Abedi to travel from Manchester
        to Libya via Amsterdam and Istanbul on 15 April?
A. Yes, that's right. Effectively, that was the same
        flight as the parents who were then returning to Libya
        as well.
Q. I believe it's the position that those were one-way
        tickets from Manchester?
A. They were, yes.
SIR JOHN SAUNDERS: And we should understand that Ismail was
        all this time in the UK, in England?
MR GREANEY: Ismail was in the UK throughout this time.
    Just to summarise that, the position was parents and
        younger siblings are returning to the UK on 6 April --
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A. Yes.
Q. -- and then, on 15 April, parents and siblings and Hashem and Salman Abedi are all travelling to Libya together?
A. Yes, that's right.
Q. So 13 April, the Micra is acquired. 15 April, the brothers are going to Libya?
A. That's right, yes.
Q. By 15 April is it the investigation team's clear understanding that the TATP had been manufactured?
A. Yes.
Q. At 74 Somerton Court?
A. Yes, that's right.
Q. So where does the Micra come into this tale?
A. The Micra is driven to Somerton Court and the contents of the flat effectively are cleared out, so they empty the flat, and we would say that the Micra has then been driven to Devell House in effectively -- and I know we may come on, I think, to show the schematic that we've got, which is very much about the trip of the Micra and the trip of the taxi journey. So it's driven to Devell House and it's parked in that car park and we would say that within the Micra at that time are a number of items which we subsequently recovered. That included the vast majority of the sulphuric acid and

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it would have also included a large drum which was missing, a large blue drum, and within that large blue drum we believe, and we proposed during our prosecution case, that within that drum was all of the manufactured TATP and that TATP was effectively held within a safe environment in that drum. I'm not sure I can necessarily go into that.
Q. No, I'm not going to ask you about how it was stored in any more detail. We simply need to understand the relevance of Devell House and its relevance is, within the gated car park to those premises, the Micra was parked during 15 April and 18 May when Salman Abedi was in Libya and it was within the Micra that the TATP was stored?
A. Yes, that's right.
Q. Was a fourth relevant address apartment 39 at Granby House?
A. Yes, it was.
Q. What did the investigation demonstrate the relevance of that address to have been?
A. Granby House was specifically rented by Salman Abedi as a premises to manufacture the improvised explosive device. So this was effectively bringing the TATP from the Micra, together with other component parts, to actually build that improvised explosive device.
Q. And that was an address that Abedi rented on the day that he returned to the United Kingdom, 18 May, as I have said?
A. Yes.
Q. And that he moved into right away?
A. Yes, he did, yes, that morning.
Q. Let's move on in time. As I have said, Salman Abedi returns to the UK on 18 May. We know about his hostile surveillance on the 19th, 21st and 22 May, although you'll tell us a little more about it in due course. I want to take you to 19.55 hours on 22 May, which is paragraph 43 of your statement. What did the investigation reveal happened at that time?
A. At this time, Salman Abedi takes a taxi to the Shudehill bus station via Granby Row. The taxi effectively waits outside Granby House at 8 o'clock in the evening. Salman Abedi is seen on the CCTV to emerge at 8.06, and at this time he's carrying a large rucksack on his back. The rucksack appears extremely heavy. Salman doesn't remove the rucksack from his back whilst he's in the taxi and he's then dropped off on the junction of Thomas Street and Shudehill in Manchester city centre.
Q. You'll know and I know and many people will know, that's a location which is very near to Victoria Station, but obviously not at Victoria Station?
A. No, it's about 400 or 500 yards away from Victoria Station and that's obviously where the tram stop is actually situated.
Q. So obviously he could have asked the taxi driver to drop him at Victoria Station but chose to be dropped off just one stop away on the tramline?
A. Yes.
Q. Did the investigation have a theory about why he did that?
A. It's pure speculation, but it will help with his, effectively, blending into the environment and his anonymity.
Q. So the way put it in your statement is:
"It is believed he took the tram from Shudehill to Victoria Station so as to avoid walking with a heavy device that he was carrying in his rucksack and also to enable him to blend in."
A. Yes.
Q. Did your investigation also reveal that Abedi made, between 20.18 hours and 20.23 hours, a number of calls to a Libyan number?
A. Yes, that's right.
Q. Has an analysis led your team to conclude that that number was one used by the Abedi family members who remained in Libya?
A. Yes, that's right.
Q. One of those calls was successful, lasting for 4 minutes and 12 seconds?
A. Yes, yes, it was, and although in my statement I say there's no further information available about the contents of that call, within the criminal trial process, at the conclusion of that trial process, I am aware that the trial judge actually said that he was quite certain that call was made from Salman Abedi to Hashem Abedi.
Q. As part of their joint plot?
A. As part of that joint plot and enterprise, yes.
Q. As we know, your investigation revealed through the CCTV work that was done that Abedi exits the tram at 20.30 hours at Victoria Railway Station with that rucksack on his back, entered the lavatories at the station, remaining there for 10 minutes, and then at 20.48 hours taking the lift to the City Room?
A. Yes.
Q. We also know that the CCTV footage shows that he entered
the City Room at 20.51 hours, remaining for 20 minutes,
but then returning to the tram platform and sitting down
again for a period with the rucksack still on his back.

## A. Yes.

Q. Did the investigation develop any theory about why he

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had not remained in the City Room at 20.51 but instead gone to sit on the tram platform?
A. Again, it's difficult to put yourself in his mind, but it would have been an extremely long time to stay in that one place and we're moving into the area of just how suspicious he would have looked in that position.
Q. I suppose there are a number of potential explanations of which three are: he thought he had been spotted by someone; secondly, he thought he might be spotted if he continued to remain there; and I suppose the third might be that for a period he had second thoughts. But your own view is that the third is not likely and it's likely to be 1 or 2 ?
A. I don't see any indication of that being the case.
Q. I'm sure that's a very fair observation to make.

So he remained there on the platform, as your investigation revealed, until 20.30 hours, when he makes his way back to the City Room. We've seen him in the lift adjusting wiring under his clothing and then, as chapter 7 revealed, he remains on that mezzanine area in an area where he's not captured by CCTV between 21.33 and 22.30 hours, before walking into a crowd and detonating his bomb.

Next, I'm going to ask you about the identity of the bomber, an issue to which I said we would come back, and

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    which will involve dealing with some medical
    interventions relating to Abedi
    Did the identification process of the bomber follow
    several different and distinct strands?
A. Yes, it did.
Q. Including photographic images?
A. Yes.
Q. Fingerprints?
A. Yes.
Q. Dental records and DNA?
A. Yes.
Q. And also, as you've told us, the bank card that was
    found near to his body?
A. Yes, that's correct.
Q. But because of those various strands, is it not possible
        for you in evidence to give a strict chronological
        breakdown of that work?
A. Yes, of course. So the initial identification lead,
        effectively, came from the discovery, the recovery of
        that bank card.
Q. I'm going to ask you to pause one there for one moment.
    I think my question was probably very poorly phrased.
    What I was driving at is something you refer to in your
    statement at paragraph 48. You have various different
    strands, some of which stand alone and you can identify
    the time at which they occurred --
A. Yes.
Q. -- such as the finding of the bank card, as we'll hear
    from Mr Gallagher in just a moment. But other strands
    no doubt were running in parallel and it's not possible
    and probably not important to give a precise time in the
    chronology at which they proved fruitful?
A. I think that's fair. Sorry, I misunderstood.
Q. I'm sure it was my question. Let's deal with the one
    point in time that we can be clear about. Mr Gallagher
    will help us with it. Was it at 01.58 hours on 23 May
    that someone called Robert Gallagher discovered
    a partially damaged bank card issued by the Halifax
    Building Society to Salman Abedi?
A. Yes, that's right.
Q. Was Robert Gallagher the appointed bomb scene manager?
A. Yes, he was.
Q. Did he record what he had found or at any rate was
    a record made of what he had found on the CLIO log at
    02.20 hours?
A. Yes. That was as a result of a call from the scene, so
    he rang me to say that that had happened.
Q. And at that stage, therefore, were you given the first
        possible identification of the perpetrator of the
        attack?
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A. Yes, it was.
Q. Do you have a further qualification, namely a diploma in
scientific support skills accredited by the University
of Durham?
A. Yes.
Q. Has your work included a number of matters, not limited
to being a member of the Chartered Society of Forensic
Science?
A. That's correct.
Q. Have you also completed a counter-terrorism command
forensic management course and police search team
course?
A. Yes, I have.
Q. In 2017 was it your role to provide cover to the
Counter-terrorism Policing north-west region?
North-west?
A. That's correct.
Q. Did your work involve you working out of Greater
Manchester Police headquarters?
A. Yes.
Q. I am going to briefly introduce your qualifications for
that role. Do you hold an honours Bachelor of Science
degree in forensic investigation?
A. Yes, I do.

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A. Yes.
MR GREANEY: The next stage will be for Mr de la Poer to
    call Mr Gallagher to explain what he found and where he
    found it. This, I think, would be a convenient moment
    for a break.
SIR JOHN SAUNDERS: And we want a half hour break?
MR GREANEY: I'm going to check with Mr Barraclough. Do
    you think it's necessary to have a half hour?
A. No,I don't, sir .
SIR JOHN SAUNDERS: We're a bit behind, so if we could do
    a quarter of an hour, I'd be grateful. Obviously when
    you need longer, just tell us.
(11.32 am)
(A short break)
(11.47 am)
MR DE LA POER: Sir, interposing into Mr Barraclough's
        evidence is Mr Gallagher. May he be sworn, please?
            MR ROBERT GALLAGHER (sworn)
            Questions from MR DE LA POER.
MR DE LA POER: Please can you give your full name?
A. It's Robert Samuel Gallagher.
Q. In 2017, was your role described as the forensic and
    digital investigation manager?
A. Yes, it was.
Q. Were you employed by Counter-terrorism Policing
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A. Yes.
Q. And what sort of assistance would you provide through
    that, please?
A. I'd be on cover, providing 24/7 cover. The unit itself
    provides }365\mathrm{ days a year. So if anything does come in,
    personal cover can be contacted, but myself as a manager
    would usually be contacted as well to give any
    assistance regarding any forensic matters that we might
    have to turn out to any CT incidents.
Q. So 365 days a year, for 24 hours of each of those days,
    cover is provided by your unit and they can be called
    upon to assist an investigation if required?
A. Yes.
Q. And you sit in a manager's role within that?
A. Yes, I do.
Q. So with that background dealt with, were you off duty on
    the evening of Monday, 22 May 2017?
A. Yes, I was, I was on annual leave.
Q. So it wasn't the case that you were on call even?
A. No.
Q. But nonetheless, did you receive a telephone call
    informing you of an explosion at Manchester Arena?
A. Yes, I did
Q. At that early stage, were you notified that there were
    a number of casualties?
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A. Yes, I was.
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A. Yes, I was.
Q. Including fatalities ?
Q. Including fatalities ?
A. Yes,I was.
A. Yes,I was.
Q. Were you instructed to travel to Greater Manchester
Q. Were you instructed to travel to Greater Manchester
Police's headquarters for a briefing?
Police's headquarters for a briefing?
A. Yes, I did.
A. Yes, I did.
Q. Did you arrive just after midnight?
Q. Did you arrive just after midnight?
A. Yes.
A. Yes.
Q. And who was it that you principally liaised with when
Q. And who was it that you principally liaised with when
you arrived?
you arrived?
A. I spoke with Mr Barraclough, Detective Chief
A. I spoke with Mr Barraclough, Detective Chief
Superintendent Barraclough, went up into the fusion
Superintendent Barraclough, went up into the fusion
cell, where I knew the management would be, so I paraded
cell, where I knew the management would be, so I paraded
myself on there to speak with him.
myself on there to speak with him.
Q. And were you given a short briefing?
Q. And were you given a short briefing?
A. Yes, it was a short briefing, yes.
A. Yes, it was a short briefing, yes.
Q. And following that, were you instructed to go to
Q. And following that, were you instructed to go to
a designated point near the arena?
a designated point near the arena?
A. Yes, we were.
A. Yes, we were.
Q. Were others accompanying you from other parts of
Q. Were others accompanying you from other parts of
CTP North-west?
CTP North-west?
A. Yes, the on-call person came with me as well.
A. Yes, the on-call person came with me as well.
Q. Did you arrive at about 1.35 in the morning of 23 May?
Q. Did you arrive at about 1.35 in the morning of 23 May?
A. Yes, it was around about then, yes.
A. Yes, it was around about then, yes.
Q. At that stage, had you been given your designation
Q. At that stage, had you been given your designation
A. Yes.
Q. And what sort of assistance would you provide through that, please?
A. I'd be on cover, providing $24 / 7$ cover. The unit itself
provides 365 days a year. So if anything does come in,
personal cover can be contacted, but myself as a manager
would usually be contacted as well to give any
assistance regarding any forensic matters that we might
have to turn out to any CT incidents.
Q. So 365 days a year, for 24 hours of each of those days, cover is provided by your unit and they can be called upon to assist an investigation if required?
A. Yes.
Q. And you sit in a manager's role within that?
A. Yes, I do.
Q. So with that background dealt with, were you off duty on the evening of Monday, 22 May 2017?
A. Yes, I was, I was on annual leave.
Q. So it wasn't the case that you were on call even?
A. No.
Q. But nonetheless, did you receive a telephone call informing you of an explosion at Manchester Arena?
A. Yes, I did.
Q. At that early stage, were you notified that there were a number of casualties?

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A. Yes, I did

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\section*{Q. And at the top of those stairs did you find a cordon?}

\section*{A. Yes, there was.}
Q. And we've heard reference to this in other evidence and we'll look at it in great detail, no doubt, in chapter 10, the terms inner cordon and outer cordon. Was that cordon at the top of the stairs the inner cordon or the outer cordon?
A. That was to go into the -- that was the inner cordon, so down the stairs and round Victoria would be classed as the outer cordon, but anything past that line was the inner cordon.
Q. Just because we will be looking at these in some detail in due course, what is the functional difference between the inner cordon and the outer cordon?
A. The inner cordon is -- anybody going in there will be going in to recover forensic evidence. From my strategies what I will be doing is setting the strategies, setting the priorities of what we want to recover, how we're going to recover them, and then anyone within the inner cordon will be in full PPE, full protective clothing, for the recovery of any exhibits.
Q. In terms of the outer cordon, does that mark the outer perimeter of where members of the public are allowed to access?
A. Between the inner cordon -- and there's another area at

That was then for the inner cordon, yes.
Q. Again, we are not going to go into any detail here at all, dealing with this in what I hope is a sensitive summary. When you arrived at the City Room, was it apparent to you that there had been a very substantial explosion?
A. Yes, it was.
Q. Did you notice that there was extensive damage to the fabric of the building?
A. Yes, there was.
Q. At that stage, was it known to you or to anyone else who the perpetrator was?
A. No, not at this stage, no.
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Q. So was it your priority to identify the suspect if they were present in the City Room?
A. That was my priority, yes, along with identifying what type of explosives may have been used.
Q. For that purpose, did you inform your team that you would make your own assessment of what had occurred?
A. Yes, I did.
Q. So from that, do we infer that you entered that

City Room with an open mind about who the perpetrator was and what had happened?
A. Yes.
Q. When dealing with a crime scene, is it important that evidence is left undisturbed until focus is given to it?
A. Yes, it is .
Q. Is there a technique that you have when managing a crime scene to ensure that happens?
A. When we are entering a crime scene, we have what we call a common approach path, so it'd be a path that everyone will follow that comes into the scene itself and what we try and do there is to minimise any contamination of any evidence or possible evidence so that people aren't just walking willy-nilly round the crime scene and they will follow the path that I have set.
Q. So given your last answer, did it take you to arrive in the City Room for that path to be set?
A. Since I had taken over as the crime scene manager, yes, it was me then that set that path.
Q. Just so that we have it on the record, and again it may be something that we touch on in chapter 10 in relation to some officers' interaction with the area, did you identify the common path to be walking along the right - hand side, staying close to the upper level wall?
A. Yes, that's correct.
Q. So it is that what we understand to be the area of the mezzanine?
A. Yes, as we walked through the glass doors, there were some steps to my right, so I told the team to stay close to those steps and to then continue walking into the City Rooms past some doors that lead down into Victoria Station, and then there were some other steps that led up to the mezzanine. When we got to there, we would then turn left and walk in front of the box office.
Q. In the course of that journey, and again we're not going to go into substantial detail, but did you identify the product of the explosion?
A. As we were walking round you could see where the seat of the explosion was: it was to my left.
Q. Again, dealing with it only insofar as it's necessary, certainly at this stage, was damage to reinforced glass

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windows of the box office noted?
A. Yes, you could notice that straightaway as you were walking in, you could see the damage caused to that.
Q. Because it is an issue the inquiry is likely to explore in more detail in chapter 10, what you said of that damage was to your eye it bore the resemblance of gunshots?
A. Experience in other crime scenes that I've attended over my career, it looked like gunshots had hit that window because of the fragmentation and the view of it, that you could see from it.
Q. Of course that's just your initial impression at that stage?
A. It was.
Q. And we know now it was shrapnel that caused that?
A. It was, yes.
Q. As you were travelling along the common access path, did you identify an item that drew your particular attention near to the last box office window?
A. Yes, we did.
Q. What was that item, please?
A. It was a bank card, a Halifax bank card, in the name of Salman R Abedi. It was lying on the floor, it was brought to my attention, we had a look at it, and from examining it you could tell it had been close to the
seat of the explosion due to the damage on the card itself.

I formed the opinion it hadn't been dropped, it hadn't fallen out of a wallet, but it had been very close to the seat of the explosion.
Q. As we've heard just moments ago from the senior investigating officer, Mr Barraclough, this was the first clue as to the identity of the perpetrator?
A. It was something that stuck out in the scene, yes.
Q. In the course of your continued journey through the City Room, did you also identify pieces of a rucksack?
A. You could see straps from a rucksack, yes.
Q. And also large pieces of metal that appeared to be from a metal container?
A. Yes, there was.
Q. Again, your witness statement deals in some detail with other matters that you identified. They are extremely distressing in their content and there is no need for us to adduce them from you now. So I'm going to move forward through that statement to the point at which you identify somebody who or a body who you suspected to be the perpetrator.
A. Yes, I did.
Q. Again without going into the detail of it, was that identification or preliminary identification made by you 77

\section*{A. Yes, they were.}
Q. And were they sent to the Greater Manchester Police Fingerprint Bureau for comparison?
A. Yes, we turned the staff out during the night and we got them over there, yes.
Q. In simple terms, you got them out of bed in order to come and assist your investigation?
A. Yes.
Q. Was it, however, established that although Salman Abedi had a criminal record, there were no fingerprints on file for his right hand?
A. Yes, correct. When he was arrested and fingerprinted, at the time of arrest his right hand was in a cast due to an injury, therefore they couldn't take fingerprints, but I wasn't aware of that at the time.
Q. Did information come back to you that it would be necessary to take fingerprints from the left hand?
A. Yes, it did.
Q. And was it that process that led to the positive identification via fingerprints?
A. Yes, I requested the fingerprint experts to attend the scene so they could carry out the fingerprinting at the scene and then they were able to give me the identification.
Q. Again, taking this time from Mr Barraclough's statement,

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that indicates that that positive identification occurred at 10.35 hours on 23 May.
A. Yes, it would have been the full identification then, yes.
Q. Two more matters to deal with, with you, Mr Gallagher. We're going to take them out of order for reasons which I think will become obvious.

Plainly, your role continued for some considerable time as crime scene manager.
A. Yes.
Q. You were also a participant in the DVI process?
A. Yes.
Q. We are not going to go into that detail at all, as has already been indicated by Mr Greaney, but in summary form, you remained an integral part of the investigation in that role as crime scene manager; is that right?
A. That's correct.
Q. Culminating in, I think this is right, you gave evidence at the trial of Hashem Abedi?
A. Yes, I did, yes.
Q. During your time in the City Room, again we are here with you, Mr Gallagher, just prefiguring an issue that may take on some importance in chapter 10, was there concern about the ceiling?
A. Yes, there was health and safety concerns, yes.
Q. Let's just investigate that to a small degree. Was the centre area of the ceiling of the City Room constructed of glass?
A. Yes, there was large plate glass panels.
Q. And approximately at what time in your stay in the City Room was that concern identified?
A. We didn't quite notice them when we first went in because it was still dark outside, but as it got a bit lighter we could see that some of the panels had been completely smashed. There was one in particular that was broken and it looked like it was about to fall in at any time. And then a lot of the other panels were cracked and smashed as well.
Q. So as the sun came up, those features were identified but no glass at that stage had come down?
A. Not at that stage. It came down later, sorry.
Q. Approximately when did glass from the ceiling come down?
A. I think the first one came down around about 10 o'clock in the morning and then a second one came down. We had to vacate the City Room. We got extra PPE, hard hats, et cetera, to go back in. Then I think it was as we were about to do the DVI or the DVI had just started when the second panel came down as well.
Q. So we get the sequence clear, did it take the first panel to come down before people retreated to put on

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\section*{PPE?}
A. The hard hats, yes.
Q. So the first panel came down, people retreated, it's quite plain that the area was unsafe and items could fall from the ceiling, put on PPE, went back in again and then a second pane came down?
A. Yes.
Q. When that second pane came down, did that cause a retreat for a second time or at that stage was it safe in people's judgement to continue working there?
A. No, we retreated out to just reassess the damage that was there. What we requested then was we had some fire officers attended to the glass doors and they then acted as checking the panels at all times and should they notice that one of the panels look like it's going to be dislodged, they had whistles to attract our attention so then we could vacate the City Room.
Q. Thank you. That was my penultimate matter to ask you about.
SIR JOHN SAUNDERS: I have not managed to make a note of when you actually arrived.
A. I got there, I think on my statement, sir...

MR DE LA POER: 01.35, I think, sir.
A. It was 01.35 I got to Victoria Station, sir, and then when I spoke to... It was 01.50 when I went into the
scene.
SIR JOHN SAUNDERS: Thank you very much.
MR DE LA POER: The final matter that I'm going to ask you about is an animation that has been created and upon which animation the key exhibits seized from the City Room are marked. This animation, do you agree, Mr Gallagher, is capable of being extremely distressing to some?
A. Yes, it can be.
Q. It is something that you have seen and in fact you saw during your evidence in the trial, so it has been played publicly previously?
A. Yes.

MR DE LA POER: I'm going to give a moment, sir, if I may, to people who may wish to leave or to turn away from
their feed. The animation itself runs to about 5 minutes, so if people are stepping away, I would encourage them to do so for that duration and I make clear that it does contain some photographs of items seized from the scene in the form that they were in, but it is not graphic in its content. But that said, it is possible that it could be extremely distressing.

\section*{(Pause)}

Mr Lopez, please, \(\{\) CPS000164/1 \(\}\).
Before we play it, and I have given Mr Lopez prior
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warning of this, there are going to need to be places
during which we stop at this. Sir, can I give the explanation for that? There are sections of this which reveal parts of the device, which the inquiry under no circumstances want to be made public given the concern about assisting future acts. So we will pass over those sections with Mr Lopez taking it down, moving on, and then putting it back up again.
SIR JOHN SAUNDERS: Thank you.
MR DE LA POER: We'll start, please, from the beginning.
Mr Lopez, I remind you of the first time to stop: 02:45.

\section*{(Video played to the inquiry)}

Pause it there, please, Mr Lopez.
Is that the location of the bank card that you
identified, Mr Gallagher?
A. Yes, it is, yes.
Q. Thank you.
(Video playing continued)
SIR JOHN SAUNDERS: Can we stop there for a minute? We saw earlier on a microchip.
A. Yes, sir .

SIR JOHN SAUNDERS: Is that meant to have come from this card or is it unrelated?
A. No, sir, it's come from the mobile phone.

SIR JOHN SAUNDERS: Are all the items that we are seeing
linked in some way to Salman Abedi?
A. Yes, sir. They were my priority exhibits --

SIR JOHN SAUNDERS: Just so I understand and we all understand what we're watching.
A. Yes, sir .

SIR JOHN SAUNDERS: Thank you.
MR DE LA POER: Two more seconds, please, Mr Lopez, before taking it off the screen to move it forward.

You can now take that off the screen for us and move
it forward to 03:05.
We're just going to play a very short section here,
Mr Lopez, up until 03:12. So just a few seconds,
please.
(Video playing continued)
Take that down again and resume at 03:24.
(Video playing continued)
I would like you to stop at 04:48. Thank you.
(Video playing continued)
Pause it there for a moment.
We can see a piece of oil can indicated there,
Mr Gallagher. Are you aware from your involvement
in the investigation, and it's something that we'll hear
from another witness in due course, that oil cans formed
a key line of investigation in terms of establishing who was involved?

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A. Yes, they did.

MR DE LA POER: Sir, for your reference it is Mr Ryder, who will be joining us tomorrow, who will be able to give us some assistance with that.

Thank you, Mr Lopez. On, please, to 04:48. (Video playing continued)
Is that what you initially assessed as potentially being from gunshots?
A. Yes, exactly.
Q. Thank you very much indeed, Mr Lopez. You've stopped it at exactly the right point. Leave it on screen for one moment longer so everyone can see that layout finally indicated. Thank you very much indeed. If you can take that down.

Mr Gallagher, as you told the chair in answer to his question, do those items there indicated in that animation sequence form the key items that you identified in your role as crime scene manager as being connected to the suspect, Salman Abedi?
A. Yes, they were, yes.
Q. Are they related in one way or another, or at least suspected at the time to have been so, to the device?
A. Yes.

MR DE LA POER: Thank you very much indeed, Mr Gallagher.
Those are my questions. We don't have any indication
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that there are any questions from core participants, but we are operating a slightly less efficient platform today than we do on other days, so Mr Gallagher, I wonder if I can ask you just to wait for 20 minutes in the building, please.

If we receive notification that there are any questions arising, that way we can manage them before Mr Gallagher goes away, but I see no reason why, once the holding slide has gone up and positions changed, we couldn't continue with Mr Barraclough's evidence.

Can I ask those responsible for the technology to put up the holding slide?
(The witness withdrew)
(Pause)
DCS SIMON BARRACLOUGH (continued)
Questions from MR GREANEY (continued)
MR GREANEY: I'm next going to deal by way of summary with you with the other steps that were taken to confirm the identity of the bomber and, so far as it is apparent to me, I will deal with them in chronological order.

The next step, as we have understood it, was the comparison between an image that was a photograph that was taken of Salman Abedi in situ in the City Room post-detonation with other images that existed of him, and an expert in image assessment carried out that

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comparison and concluded that they were one and the same person; is that correct?
A. Yes, that's right.
Q. That, sir, was at 04.43 hours on 23 May?

\section*{A. Yes, that's right.}
Q. Then at 10.35 am on 23 May, the fingerprint examination that Mr Gallagher referred to again proved a positive match between the fingerprints of the person believed to be the bomber and Salman Abedi?
A. Yes, that's right, from the left hand.
Q. Mr Gallagher explained that Abedi's fingerprints had been taken following an arrest for shoplifting in 2012.

\section*{A. Yes.}
Q. At 10.35 am , therefore, having been told of the bank card, the image assessment and the fingerprints, did you consider that the identity of the perpetrator of the attack was known?
A. Yes, for investigative purposes, absolutely, yes.
Q. Other steps that were thereafter taken \(--I\) confess I don't know the exact date of all of these and it may not be important, but was the clothing worn by the bomber, I won't identify the brand, was the clothing compared with CCTV footage of Salman Abedi on 22 May?
A. Yes.
Q. And an expert in such analysis confirmed that the two
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    sets of clothing were consistent, the one with the
    other?
    A. Yes, they were
Q. Next, I think this is next anyway, there was
a post-mortem examination of Abedi and DNA samples were
obtained. Were they compared with a DNA sample obtained
on the occasion of his arrest in 2012?
A. Yes, they were
Q. And again, a match between Abedi's DNA and the bomber's
DNA?
A. Yes.
Q. Then were the teeth of the bomber compared against
evidence about the teeth of Abedi?
A. Yes
Q. And again, there was a match?
A. Yes, there was
Q. I think that was 1 June, so I have taken these slightly
out of order for this reason: was it also identified
during the post-mortem examination that the bomber had
an implant in his right hand?
A. Yes, that's right.
Q. And on 31 May, was it confirmed by a medical expert that
Salman Abedi had had precisely the same implant in his
right hand?
A. Yes, exactly.

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Q. So in short therefore, an identification for investigative purposes occurred at 10.35 am on 23 May, and that identification was subsequently confirmed to have been correct using the various techniques that I've just described?
A. That's right. That led to a conclusive identification
Q. Did Greater Manchester Police, I'm now at paragraph 72, officially release the identity of Salman Abedi as being responsible for the attack at a press conference given by the Chief Constable at 17.21 hours on 23 May?
A. Yes, he did.
Q. Based upon the identification material that was at that stage available?
A. That's correct
Q. Bearing in mind that some steps remained to be completed by that time, for example the DNA and the odontology, why was that identification publicly released at that stage?
A. The identification of the bomber and the release of that information would potentially provide real investigative opportunities and investigative leads, so it was important that we got that out into the public arena so that it would enable us to actually receive information directly about Salman Abedi
Q. Would it also tend to reduce the extent to which you
Q. That was the principal purpose?
A. Yes.
Q. Mr Barraclough, you, I know, are aware that there has been some public concern, not to say political concern, about a leak or potential leak of Abedi's identity within the United States.
A. I am aware of that, yes.
Q. What are you able to contribute to our understanding in that regard, please?
A. The actual details of that are not within my investigation. I've had absolutely no dealings with it . From an investigative perspective, I don't think it's caused any damage to us or didn't cause any damage to the investigation at the time. The trouble with the

\section*{91}
lack of control of this information is that it does lead to completely unnecessary hurt for families and victims.
SIR JOHN SAUNDERS: And it could be serious in the investigation. In the event it wasn't, but presumably you could imagine circumstances in which it could be?
A. If we'd had a particular live operation that that could have compromised, yes, it could have been. But the actual detail of what happened and what that leak amounted to, I really couldn't comment on because I don't know.
SIR JOHN SAUNDERS: Thank you.
MR GREANEY: The chairman's point no doubt is well made.
What seems to be the position is before you had decided to release the identity of Abedi, it was revealed in the media in the United States.
A. Yes, it would appear so, yes.
Q. That was capable of causing damage to your investigation?
A. It was capable, yes.
Q. Albeit in the result it did not so far as you are concerned?
A. No.
Q. But the point you would make is you can well understand that it may have caused distress to those affected by the attack?

A. Yes, in circumstances such as this we would always much prefer to communicate that information directly with
Q. But I believe what ought to be said is that insofar as you're aware, there is nothing to indicate that the leak to the American media came from within your investigation?
A. No, it did not.
Q. That deals with the steps taken to identify the bomber.

In terms of your immediate investigative objectives,
A. Yes.
Q. Securing the scene of the bombing?
A. Yes.
Q. And gathering all available evidence?
A. Yes.
Q. And identifying any further offenders together with assessing and identifying the continuing threat to safety?
Q. Along with identifying eyewitnesses and pursuing any and all relevant lines of enquiry?
A. Yes
Q. We'll just identify in summary some of the other investigative steps that were taken. Was the scene of

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the attack preserved, photographed and video-recorded?
A. Yes, that's right, with the 360 -degree specialism.
Q. Bearing in mind the bank card that had been found, were a number of financial enquiries undertaken in relation to Salman Abedi?
Q. Did research of police systems identify Salman Abedi's last known address to be 21 Elsmore Road in Fallowfield?
A. Yes.
Q. Was a search warrant under the Terrorism Act obtained the same day, 23 May?
Q. That being the day upon which the address was identified, and were those premises then searched?
A. They were.
Q. Did the search of those premises in fact last between May and 10 June?
Q. That may sound like a long period, could you explain?
A. Well, the early searches in relation to this ooking for trace evidence, so trace evidence would include the presence of TATP, which could be in
microscopic form, so hence the detail undertaken for each search and the length of time it would take.
Q. Were steps also taken to locate other addresses and individuals linked to Salman Abedi?
A. Yes.
Q. We've dealt with that to some extent already. Was one of the persons identified Ismail Abedi, his older brother?
A. Yes, that's right.
Q. Was his identity recognised in the early hours of 23 May?
A. Yes.
Q. With a search warrant being obtained to search his home in Manchester on the same day, 23 May?
A. Yes, that's right.
Q. And that search, you'll be able to confirm, lasted for a similar period, namely 23 May to 11 June?
A. Yes, that's right.
Q. At that early stage were other steps taken to preserve CCTV footage?
A. Yes, extensively.
Q. We've seen from the imagery produced by Mr Gallagher that the remains of a mobile telephone were found at the scene.
A. That's correct, yes.

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Q. In the proximity of the seat of the blast?
A. Yes.
Q. And as everyone will know, it is possible, sometimes at any rate, to obtain information from a mobile telephone. Were steps taken to see whether that was so here?
A. Yes, that's right. We were able to get what they call a QR code off the phone.
Q. Did the QR code provide the international mobile equipment identifier or IMEI number for the handset?
A. Yes, it did.
Q. Showing the make and model of the phone?
A. Yes.
Q. And what steps were then taken once you were armed with the IMEI number?
A. That then allows us to interrogate what information is associated with that IMEI number. In other words numbers that would be associated to it and then -telephone numbers and then an interrogation of the contacts that those numbers have made with other numbers.
Q. So the IMEI number also enabled you to obtain details of the top-up card?
A. That's right.
Q. I should have said: there's no doubt that this was Abedi's phone?
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A. Yes, it was.
Q. And the top-up history, I believe, provided further
lines of enquiry to follow in the immediate aftermath?
A. Yes, that's right.
Q. What would, on the face of it, obviously have been of
interest to the investigation would have been any text
messages that might have been recovered?
A. Yes.
Q. So were steps taken to see whether such data could be
extracted from the device?
A. Yes, they were, and I think I might lead on to that
later in my statement, but it was very badly damaged
in the explosion.
Q. The way in which you put it, it's in fact a little
earlier in the statement at paragraph 71, is that:
"Such was the damage that no data could be extracted
from the device."
A. That's absolutely right.
Q. So the question of whether hostile reconnaissance was
done via the internet on that phone is one that you were
unable to resolve and to this day have not been able to
resolve?
A. Yes, that is correct, but also bear in mind that the
Alcatel phone is a very, very simple phone. It's not
a smartphone.

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Q. I see, I hadn't appreciated that but do now. And indeed, as we're going to see when we turn to deal with mobile telephones in further detail, one of the features of this investigation is that although you have identified the existence of a number of handsets, I think 14 - -
A. Yes.
Q. - you have been able to recover only a very small number, I think two of them?
A. That's right, and it's the two that are referred to in evidence, hence the absence of telephone information from actually within the telephone itself
Q. Yes. We were dealing, just before Mr de la Poer takes us to part 2, with other steps of the investigation that were taken. Did it become obvious at an early stage that TATP was the explosive that had been used in the IED?
A. Yes, it did.
Q. Did that lead to enquiries regarding the purchasing of precursor materials for TATP?
A. Yes, that's right
Q. Was open source research conducted extensively in relation to various strands of the investigation?
A. Yes, it was.
Q. Did witnesses, so those who had survived the blast,
begin to be traced or to come forward?
A. Yes, they were.
Q. I believe that in the steps that we've just identified, we're speaking only of the initial and immediate lines of enquiry and that other enquiries in the course of your investigation were undertaken as time pressed on?
A. Yes, absolutely, and of course these things expanded exponentially.
Q. Then finally in relation to part 1, an issue of importance, although we'll be turning to it in more detail -- well, turning to it in chapter 13. Was there an immediate working assumption on the part of the investigation that the arena attack was ideologically motivated?
A. Absolutely.
Q. Was that so because of the type of attack?
A. Yes, it was.
Q. The early identification of the bomber?
A. Yes.
Q. Recent events?
A. Yes.
Q. So for example, the March attack?
A. Yes.
Q. And the terrorism threat level, namely severe?
A. Yes.

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Q. As a line of enquiry, in addition to those that we've dealt with already, did you have to consider how it was that Salman Abedi had come to be radicalised?
A. Yes, I did.
Q. Although you will have heard me say at the very beginning of your evidence that that is an issue upon which you'll be asked questions when you return in chapter 13.
A. Yes, of course.

MR GREANEY: Mr Barraclough, that is all I'm going to ask you about part 1. As you appreciate, Mr de la Poer is going to deal with parts 2 and 3 . There's time to start that before lunch, so I'm going to ask that the holding screen go up, please, and I will swap places with Mr de la Poer.

\section*{(Pause)}

MR DE LA POER: Can I just check that the holding slide has been taken down now?

May the witness please be sworn? MS LORNA PHILP (sworn)
Questions from MR DE LA POER
MR DE LA POER: What is your full name, please?
A. Lorna Kirsten Philp.
Q. We have moved on to part 2 of the senior investigating officer 's statement, which is entitled "The device and
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    its construction" and we're going to begin with you
    assisting us with that from a scientific perspective.
    So can we begin in this way? In 2017, were you the
        principal case officer at the forensic explosive
        laboratory based in Kent?
    A. So in 2017 I was a senior case officer; I became
a principal case officer at the start of 2018.
Q. So was it the case that that was your position as at the
trial of Hashem Abedi?
A. That's correct yes.
Q. Is that the position today?
A. Yes, I'm still a principal case officer.
Q. How many years' experience do you have as an analytical
chemist?
A. I now have over 19 years' experience.
Q. Do you have a particular interest in the forensic
examination of items for features of explosive
significance?
A. That is correct, yes
Q. Do you hold an honours Bachelor of Science degree in
chemistry?
A. I do.
Q. And are you a Master of Science in forensic science?
A. That is correct.
Q. A chartered chemist?

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A. Yes.
Q. A fellow of the Royal Society of Chemistry?
A. Yes.
Q. And a member of the Chartered Society of Forensic Science?
A. Yes.
Q. Have you been involved in the Operation Manteline investigation since the day after the attack?
A. Yes, that is correct.
Q. And as we shall come to shortly, did you visit the arena on 23 and 24 May?
A. Yes, myself and two colleagues from the laboratory attended the scene to help with the examination.
Q. We'll come to that in a moment. But as an introduction to the subject matter that we are talking about, what is TATP?
A. TATP, which stands for triacetone triperoxide, it is an extremely sensitive primary high explosive.
Q. Just breaking down some of the terms that you've used there. The phrase primary high explosive, what does that mean?
A. A high explosive is a material that will undergo a detonation, so it produces a shock wave when the explosive functions to give us a blast. You get different types of high explosives, primary high
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explosives and secondary high explosives. A primary high explosive is extremely sensitive to initiation and can be detonated from stimuli such as friction, impact, heat or spark. These are commonly used in very small quantities within an initiation system.
Q. So those initiators are used in small quantities?
A. The primary high explosive would be used in very small quantities generally within an explosive device.
Q. You've described it as extremely sensitive. Does that mean that during manufacture and handling, it is potentially extremely dangerous to the person engaged in that?
A. Yes. TATP is an extremely sensitive and unstable primary high explosive such that it has no commercial use.
Q. Simply put, is that because it is so dangerous to handle?
A. Yes, because it is so dangerous.
Q. What are the principal chemical constituents of TATP?
A. There are three ingredients required to manufacture TATP: you need hydrogen peroxide, an acetone, and an acid.
Q. Is an example of one such acid, sulphuric acid?
A. Yes, sulphuric acid can be used to manufacture TATP.
Q. We've heard from the senior investigating officer that

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acetone is very readily available on the high street; is that correct?
A. That is correct, yes.
Q. Is it commonly used as a solvent?
A. Yes.
Q. Because this might become important in due course to a limited degree, does it have a distinctive smell, which some people describe as fruity?
A. That is correct, yes, acetone has a very distinctive smell.
Q. Next, hydrogen peroxide. We're not going to go into any substantial detail here, but is that commonly used as a bleaching agent?
A. Yes, a bleaching agent and disinfectant.
Q. It will be for others to deal with the availability of that, so we'll turn to sulphuric acid. What can you tell us about that in terms of its potential legitimate use?
A. Sulphuric acid can be found in car batteries. That is the acid within a lead-acid battery.
Q. Does hydrogen peroxide have a smell?
A. At the concentrations available to the general public, no, it does not have a distinctive smell.
Q. Again, we're not going to go into the levels here in any detail whatsoever, but in the levels that we know were
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    purchased in this case, would it have a smell?
    A. No, it would not have a smell.
Q. Sulphuric acid, does that have an odour?
A. Sulphuric acid at the higher concentrations has
a pungent odour. By that I mean, when you smell it you
can almost feel it inside your nose. It's very sharp.
SIR JOHN SAUNDERS: It's a very long time ago, but it
certainly used to be used in schools in chemistry labs
and things like that.
A. Yes.
SIR JOHN SAUNDERS: Is it still?
A. Yes.
SIR JOHN SAUNDERS: So it's not just in car batteries, it
can be found n educational establishments as well?
A. Yes, it would be, usually in the lower concentrations.
MR DE LA POER: Again, we're not going into the detail here,
but in the concentration relevant to this case, would it
have had a detectable odour?
A. It may have had an odour if you were close to it, but
it would not spread within a room.
Q. That's all I want it say by way of introduction to TATP.
Again, you are as concerned about this as I am, but
we are not going to go into the sort of detail that
might provide any sort of assistance to those who wish
to misuse it, so we'll move, please, to your initial

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    scene examination. That's behind your tab 11 although
    we can deal with this in quite a brief form, I think.
            As you turn that up, perhaps you can confirm that on
        26 May 2017 you prepared a preliminary report which
        arose from your visit on 23 and 24th?
A. That is correct, yes.
Q. Within that document, I'm here looking at your third
        paragraph, perhaps you can confirm that your conclusion
        at that very early stage was this:
            "That based on examination of the scene, it would
        appear that an improvised explosive device had
        functioned within the box office area of
        Manchester Arena as accessed from Victoria Station";
        is that right?
A. That is right, yes.
Q. You go on to detail a number of your preliminary
    observations, some of which are distressing in their
    content, but fundamentally, having worked that out at
    a very early stage from your initial examination, did
    all of your subsequent extremely detailed analysis lead
    you back to that conclusion as being correct?
A. It did, yes.
Q. We'll just review some of that so far as it will be
    relevant or potentially relevant to the inquiry.
    Did you examine a very large number of items which

\section*{A. I did, yes.}
Q. And in fact, were there so many items that you weren't the only person examining them, you had colleagues to help as well?
A. Yes, so my role within the investigation was to deal with the arena scene and the items that arose from there as well as a number of smaller scenes. Other scenes within the investigation were dealt with by my colleagues, which I then at the end pulled a comparison statement across the whole investigation of items that had been submitted to the forensic explosives laboratory.
Q. We're going to just review briefly some of those items now. Were you provided with what was termed a gilet or perhaps a body warmer as one of the items that you considered?
A. Yes.
Q. And a feature of that item was, is this right, that you identified that the pocket had been cut away?
A. Yes. The inner lining on the front right-hand pocket appeared to be cut and there was a section missing.
Q. So we're clear about it, your examination, obviously you are extremely experienced in examining items which have been damaged by explosion, was that alteration or

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change to the garment caused by the explosion?
A. No, that appeared to have been cut as opposed to damage caused by the explosion.
Q. Based on your understanding of how these devices work, might that have been relevant to the device itself?
A. It could have been, yes. However, it could also just have been damage to the jacket that had nothing to do with the device.
Q. On that subject, the inquiry has received evidence from some witnesses who have indicated that they saw Salman Abedi with the rucksack off his back. Is it right that sometimes devices of this nature can effectively be attached to a person through their wiring so that it's very difficult to remove them?
A. It would depend exactly on how the wiring of the device was constructed, but it would be possible that the device was wired in such a way that it would be difficult to remove from that person.
Q. So that is some configurations of devices, but is it also possible to configure these devices in a different way such that an item like that rucksack can be removed, or is that highly unusual?
A. Yes, it would be possible to configure it in such a way that it could be removed as well.
Q. From all of the examination you did of the very many
items, were you able to reach a firm conclusion about whether or not the device that Salman Abedi had was of the type that he would have been attached to or one that he might have been able to remove with relative ease?
A. I couldn't tell from my examination as all the items I received were very damaged. Therefore I could not determine exactly how the device was wired and constructed definitively .
Q. Turning to some other items, again just because they have a relevance to connecting individuals to the investigation, there was involved amongst those items one identified as a money tin; is that right?
A. There were lots of fragments that had come from a money tin.
Q. Are you able to confirm, although it will have been others who seized it, that the investigation was able to establish that the lid to that money tin, or at least one that fitted a tin of that type, was found at Granby Row?
A. Yes, there was a lid examined from Granby Row by my colleague that was the same as the control item purchased by the police.
Q. So it's absolutely clear what the purpose of my question is, that provides a connection between Granby Row and the scene of the detonation? 109
A. Yes.
Q. Or at least a potential one.

By way of a further example, did you examine items of fibreboard from the arena scene?
A. Yes, there were very small fragments of fibreboard found at the arena.
Q. Again, it' II have been others who discovered this, but were there offcuts of a materially identical fibreboard recovered from Granby Row?
A. That is correct, yes.
Q. Did you also have cause to examine all, or at least parts of them, of the other components that you would expect to comprise an IED device?
A. Yes, there were a number of components from the arena scene that I identified as being part of the IED.
Q. I'm not going to go into what they are for reasons I have previously stated, but each of those no doubt confirmed to you in your view of what device was being dealt with?
A. Yes, it did.
Q. Finally, in terms of items that you examined, did you establish -- and this is a distressing fact which I just pause to acknowledge so that people are prepared for it --29.26 kilograms of metal nuts?
A. Yes, that was the quantity of metal nuts I examined,
recovered from the arena.
Q. In addition, another 1.47 kilograms of screws or cross dowels?
A. Yes.
Q. And taking an average of 10 grams an item, did that lead you to the conclusion that there were approximately 3,000 items of shrapnel recovered?
A. Yes, that is correct.
Q. I'm going to turn away from the items that you examined to what has been termed instructional videos. Again, we are going to deal with these carefully, I hope. Were you invited by the investigation to consider two videos given the labels \(\mathrm{CAH} / 38\) and \(\mathrm{CAH} / 39\) ?
A. Yes, I was.
Q. Dealing with \(\mathrm{CAH} / 38\) in particular, does that contain a method of how to construct TATP?
A. Yes, it gave clear instructions for the manufacture of TATP.
Q. You will have had cause to no doubt examine many such videos in the course of your substantial career; is that right?
A. That is correct, yes.
Q. The chairman has seen that video. Can you tell us of what sort of quality it is in terms of its clarity of explanation?

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A. In my opinion, this is a very clear video that demonstrates how to manufacture TATP and is one of the better instructional videos in terms of clarity that I have viewed.
Q. There are other data points outside your expertise about, for example, when this video was first published and by whom, but just dealing within the video's four corners, were you able to reach any conclusion about whether or not Salman and/or Hashem Abedi watched that particular video?
A. I cannot give an opinion as to whether they watched that particular video or not.
Q. Are you able to say, though, whether, had they followed that video or one which was materially identical, they would have produced a substance very like that used at the Manchester Arena?
A. Yes, that video gave instructions to manufacture TATP, which was the explosive used at the Manchester Arena.
Q. So its method is consistent, can we say, with that which was ultimately produced by Salman and Hashem?
A. Yes.
Q. I've already asked you questions about odour. Just to help us with one piece of evidence that the chairman will hear shortly from Mr Barraclough: a witness in this case, Mr Elwafi, attended the property that he was
associated with, Somerton Court, after it had been cleared out by the Abedi brothers, and he describes an odour like a mixture of petrol and diesel, which might be difficult to imagine for some, but not for others.
Are you able to help us with whether or not that sort of odour might be expected to be in connection with somewhere where TATP had been created?
A. I would not expect to have a smell similar to petrol or diesel from the manufacture of TATP.
Q. But might you, bearing in mind what you've said about acetone, expect some sort of odour?
A. Yes. However, I do not expect the odour to last very long after the material has been removed.
Q. We know there's other evidence, that we'll turn to shortly, that TATP was manufactured or at least present at Somerton Court, but whatever caused that odour, it is likely to be something other than the TATP itself?
A. Yes, I can't explain the odour of petrol or diesel.
Q. We're going to turn to a list of areas which tested positive for TATP. Before we bring it up, can you just help us with whether or not TATP is the sort of substance that is likely to leave a trace if it comes in contact with another item?
A. It will leave a trace if it comes in contact with another item. However, that trace may not last very

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long on that surface because of the nature of TATP.
Q. Is it possible to determine the level of contact or the length of contact by the amount of TATP that's detected?
A. No, I cannot. There are a number of factors that will affect the length of time that TATP is retained on a surface.
Q. So with those qualifications in mind, can we please turn, Mr Lopez, to \{CPS000209/61\}?

Ms Philp, can you just confirm, because you were a participant as a witness at the trial of Hashem Abedi, what we're looking at here is an extract from the agreed facts presented at the trial ?
A. Yes, it appears to be that.
Q. For those less familiar with that process, that means that these are matters which are agreed as being correct and true as between the prosecution and the defence.

So we can see that at the Manchester Arena there were a number of occasions, which are listed under the heading DCM/1, 3, 4 or 17 as being relevant to locations where TATP was recovered.
A. Yes. DCM/1 was a kit that was used to sample a number of different areas within the arena. It had five samples and you can see the five different samples listed there, of which four contained TATP.
Q. So help us with the acronym TERK. What does that stand
for or mean?
A. That stands for trace explosive recovery kit.
Q. Is this a portable kit that can be taken to the scene to give you a reaction?
A. This is a kit that we produce in the forensic explosives lab in a quality controlled environment. It contains a number of swabs and solvent that can be used to collect a sample from the surface at the screen. It then goes back into the kit. That gets returned to us at the laboratory, where we process and analyse it.
Q. So do we see that the floor tested positive for TATP, the body warmer, the long-sleeved top and metal fragments?
A. That is correct, yes.
Q. If we move outside the Manchester Arena scene to 74 Somerton Court, which we'll hear some more about after lunch, I expect, do we see there were a number of occasions on which areas of that flat tested positive?
A. Yes, TATP was recovered in several areas.
Q. We can see that the quantities vary. Firstly, help us with what ng stands for?
A. Ng stands for nanogram.
Q. What conclusion, if any, can be drawn from the number of nanograms that are detected?
A. We would be looking at, from the levels detected at

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Somerton Court, that an item that had been contaminated with TATP had been in contact with that surface or, for example, the sump end cap in the sink, it may be that the sink had been used to wash an item or a person contaminated with TATP down that sink.
Q. So an explanation, no doubt one of a number, is that if somebody had handled TATP with their hands or gloves and then washed them under the tap in the sink, one might expect to see quantities of that level?
A. Yes.
Q. So those are connections to 74 Somerton Court --

SIR JOHN SAUNDERS: Are you going to tell us what a nanogram is in terms of percentage of a gram?
A. A nanogram is one times 10 to the minus 9 of a gram. SIR JOHN SAUNDERS: Not much?
A. Not much at all: so zero point, then eight zeros, and then 1 .
MR DE LA POER: At the bottom of this page we can see the Nissan Micra is indicated if we go over the page. We see relatively low quantities in nanograms detected from the vacuum sampled from the driver's seat, the rear seat and the boot.
A. Yes, these are extremely low levels.
Q. And given that you were able to reach some conclusions about the level of contact that may have taken place,
what might we infer from those numbers?
A. Again, these numbers could be caused by contact with an item contaminated with TATP as opposed to contact with the bulk material itself.
Q. So might it be consistent with that Nissan being used to store TATP in a sealed container but the people sitting in those seats or making contact with the boot had themselves had some contact with TATP?
A. Yes, so if somebody had contact with TATP and they'd contaminated their clothing, then if they sat in a seat, that contamination could be passed from their clothing to the seat.
SIR JOHN SAUNDERS: This is not to throw any doubt at all on any of the conclusions, it 's simply as a matter of interest: is there a limit as to when they are reliable? Can you get down to such a small amount that you can't rely on the conclusions of it?
A. Below about 15 nanograms we would not be able to confirm that, so we would not report that as being present. We need to confirm it on two separate techniques in order to say it's definitely there.
SIR JOHN SAUNDERS: Thank you.
MR DE LA POER: Then finally, we see Granby House and basement, a very significant number of areas in which it was detected. Help us with why, and it may be visible

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quantity is the clue, why we don't have any nanograms for approximately half of those?
A. Because we have what we would call bulk explosive. So anything that we can see, a visible quantity, we determine as bulk, therefore we can analyse it in a different way and we don't have a quantity present because we have a visible bulk quantity.
Q. So rather than perhaps a trace that's undetectable to the eye, you can see it?
A. Yes.
Q. Thank you very much indeed, Mr Lopez.

SIR JOHN SAUNDERS: Before we leave that, mg? That's more?
A. Yes. Mg is milligram, so 0.001 .

SIR JOHN SAUNDERS: Okay. Ug?
A. That is microgram and that's between the two. So that's 0.000001.

SIR JOHN SAUNDERS: Thank you.
MR DE LA POER: Thank you very much indeed, Mr Lopez.
Two final short matters, please, Ms Philp. Firstly, we see you said in your statement that it is not possible for you to accurately estimate the quantity of TATP used in this explosion; is that correct?
A. That is correct, yes.
Q. And that's because there are so many factors to be taken into account, many of which you just don't have any data
Q. But you estimate it, I think we can go as far as to say, in the low kilograms, but we are not going to go any further than that in terms of what that might mean; is that right?
A. Yes.
Q. So having completed all of the work that you've described for us, did you, using your expert opinion, reach any conclusion about what the intention was behind what we saw take place at Manchester Arena?
A. In my opinion, the design and construction of this device was a deliberate attempt to cause a large explosion that would injure and kill as many people as possible.
MR DE LA POER: Thank you very much indeed. We have notification of one set of questions for you, Ms Philp, and that's from Mr Weatherby, who is joining us remotely.
MR WEATHERBY: Can you hear me?
MR DE LA POER: We can hear you, Mr Weatherby, but under the moniker Neil Sheldon.

There you are, Mr Weatherby, you're now visible to us.

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\section*{Questions from MR WEATHERBY}

MR WEATHERBY: Thank you very much. I haven't got many questions and I don't think they're going to be very difficult ones. I'm not going to trespass into anything sensitive, I hope.

Can I just deal with, first of all, the battery and the switch? Again, I just want to be careful here.
I don't want to identify the battery and I don't want to identify the switch, but you have, haven't you?
A. Yes, I was able, from markings on the battery and the switch, to identify their origin.
Q. But in a device such as this, you don't need any anything battery that needs to be of a particular power to match the rest of the mechanism, can I put it that way? There's nothing strange or particular about the battery that is needed, is there?
A. No, it would just need to have sufficient power or voltage to cause the initiator to function.
Q. And likewise the switch? It doesn't need to be a particularly complicated or bespoke switch, does it?
A. No, it doesn't need to be a complicated switch.
Q. Moving swiftly on, the hydrogen peroxide. Just this: you have told us that it does have some domestic uses, but it's right, isn't it, that those uses -- there are plenty of other substances readily available which do
those jobs?
A. Yes, I believe so.
Q. There's no necessity, is there, to have hydrogen
        peroxide as a readily available domestic product?
A. That would be slightly outside my area of expertise --
Q. I' II ask somebody else.
A. -- in non-explosive uses.
Q. Both in giving evidence at the criminal trial and
        I think in your written material, you have tried to
        estimate the amount of explosives that were in the bomb,
        and I'm not going to -- and I'm going to ask you not to,
        as Mr de la Poer has said, actually put any figures on
        this. But it's incredibly difficult, isn't it, to look
        at the aftermath of a bomb scene such as this and to
        estimate the amount of explosives that would be needed?
A. Yes, I cannot accurately give you a figure for the
        quantity of explosive that was in that device.
Q. So when you previously have been asked about this,
        you have just done your best with your learning and
        experience and you've expressed a guesstimate; would
        that be fair?
A. Yes, this is an opinion of the quantity of explosive
        based on my experience.
Q. Yes. You've understood from other evidence the amount
        of precursor chemicals and catalyst chemicals that were
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        sourced. Am I right that your opinion is that the
        amount of explosives that were used in this device were
        capable of being manufactured from the known sourced
        chemicals?
A. Yes, we have known sourced chemicals for the hydrogen
        peroxide and the acid, and based on the hydrogen
        peroxide figure there was sufficient hydrogen peroxide
        to make the TATP used within the device.
Q. I want to turn to the video, but again I'm going to be
        very careful and ask you to be careful; I'm sure
        you will be. I only have a few questions about it.
        This is, first of all, an Islamic State video; is that
        right?
A. I don't know who produced this video. I simply assessed
        it for its viability to manufacture explosives.
Q. Yes.
SIR JOHN SAUNDERS: It looks a bit like it from the video
        itself, doesn't it?
MR WEATHERBY: Yes, I think so, but I wasn't entirely sure,
        so I' II ask another witness, if I may.
            As you have said, there's no evidence that either of the Abedi brothers watched this particular video, but you've agreed already that the process that's shown in the video is consistent with making TATP. You can't go much further than that in terms of the process that
A. I'm trying to ... I think I understand what I'm being asked, but I'm wondering if I can answer it without

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describing the safety measure that you're talking about.
MR WEATHERBY: Yes, I've asked it in a not very elegant way because I'm trying not to raise that point. I'm not going to take this any further.

Was there an indication from the scene of Somerton Court that the measures in the video had been followed?
SIR JOHN SAUNDERS: Apart from the fact that it didn't blow up.
A. Yes. I think you're referring to the location that the traces were recovered from.
MR WEATHERBY: Yes.
A. There was an indication there...

SIR JOHN SAUNDERS: Okay, are there indications that, whoever did it, the Abedi brothers no doubt, that they followed the instructions to avoid blowing themselves up in the process?
A. Yes.

MR WEATHERBY: I won't take it any further.
Just in terms of the movement of the substance, not only is the manufacture of the explosive dangerous but the movement of it is unless precautions are taken; isn 't that right?
A. Yes. It's very sensitive to impact and friction, so therefore if it suffered either of those during the
movement then it has the potential to explode.
Q. Yes. Again, I'm not going to ask you about any details here, but the video refers to how it should be stored to keep it safe, doesn't it?
A. It does, yes.
Q. I'm not going to ask you the detail of that, but the video does refer to that. But storing it in the way suggested, it's fairly straightforward, but it would mean it wouldn't be immediately usable; is that fair?
A. That is correct, yes.
Q. Therefore if the video was followed and they did store it in such a way, then a further process would have been necessary to make it ready for use?
A. Yes, that is correct.
Q. The investigation theory, as I understand it, is that the explosives were made in the Somerton Court flat and then they were transferred to the Micra on 14 April, where they stayed until 19 May, and then Salman Abedi turned up and picked them up; is that consistent with what you've either been told or what you've investigated yourself?
A. Yes, I'm aware that that is the investigation theory and it 's possible based on the trace evidence that we've recovered from my results.
Q. So as you've told us, the traces found at Somerton Court

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are consistent with the manufacture having taken place there?
A. Some TATP would have been manufactured there based on -or would have been present within that property at some time.
Q. Yes, so you're not in a position to say it was definitely all made at Somerton Court, but it's consistent with that having happened?
A. Yes, that would fit.
Q. Then as I understand it, the traces on the car were very minor traces?
A. Yes.
Q. So that would be consistent, would it, with the TATP being transferred from the flat, assuming that it was all made there, but would it be consistent with transferring it from the flat to the car in a closed container?
A. Yes. The levels there would suggest there was no open bulk or loose explosive within that vehicle.
Q. So the traces -- the tiny traces that you have recovered from the Micra certainly show that TATP is present in the Micra, some of it could have come from the clothing of people getting into and out of the Micra, but it could also have come from the outside of a container which contained TATP or indeed containers
carrying other things?
A. Yes, it could have come from contamination on the outside of a container. Whether that container had TATP nor something else within it, I can't say.
Q. Therefore consistent with the investigation theory, the TATP was moved and, if it was moved to the Micra, it was most likely in a closed container?
A. Yes, it would be in a closed container if it was in there.
Q. Mr Barraclough, I think, has suggested that the TATP may have been in a drum and we know that some drums were found in the Micra itself, some blue drums. Am I right that you tested those drums and in fact there was no TATP on the drums, the inside of the drums, in the Micra?
A. The Micra was dealt with by my colleague. However, I have in my comparison statement summarised the trace work that was done within the Micra.
SIR JOHN SAUNDERS: That's fine. You tell us what he found.
A. So from their results, it doesn't seem that the drums themselves were tested. It may be that they were required for other forensic disciplines to examine and we did not look for them for trace. However, we did sample all the surfaces within the vehicle.
MR WEATHERBY: Okay, that's fine.
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Again, working with the investigation theory, we know that Salman Abedi turned up to the Micra and removed items on 19 May, and again if the TATP was in a drum in the Micra then it would be consistent with the investigation theory that he removed the drum with the TATP and took it to Granby Row?
A. Possibly, yes. There was no drum of TATP within the Micra, so therefore --
SIR JOHN SAUNDERS: So you can't say either way?
A. I can't say.

MR WEATHERBY: Are you able to say from any receptacle recovered from Granby House or its environs that that was a drum or receptacle used for the transfer of the TATP to Granby House?
A. The items that were recovered from Granby House again were dealt with by one of my colleagues. However, I don't believe there was any drum recovered from Granby House. There were a number of scoops and plastic containers that had bulk material visible on them, so therefore these may have been used to transfer the TATP. But whether that was from another container into the device I can't say any more than that.
Q. Okay. So Salman Abedi turns up on the 19th, we know he turns up with a very large suitcase, but from the CCTV it is not only very large but appears to be very empty,
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in that it's light, in the way he's moving it. He spent
some time at the Micra, but the camera view is obscured
by a tree so it can't be seen clearly what is taken from the Micra and put in the suitcase, but as he drags the suitcase away, it's plainly very heavy. Have you had an opportunity to see the CCTV or the photographs?
A. I have seen a compilation of some of the CCTV.
Q. Is that in broad - I'm not interested in the detail, but is that description I have just given a fair description of what can be seen?
SIR JOHN SAUNDERS: I'm not sure your expertise goes to -I think we'll have to make our own mind up, Mr Weatherby. But it may be perfectly clear from what we've seen already.
MR WEATHERBY: Okay. And then at Granby House, at the other end, we can see that having taken the suitcase to a taxi, he is then dropped off at Granby House and he has some difficulty with the bag and he drags it up quite a few steps. Have you seen the CCTV or the stills of that?
A. Yes, I have.
Q. Would it be right if the TATP was not stored in the way that we've obliquely referred to, but if it was just simply a number of -- a quantity of TATP, that would be an extremely dangerous method of moving it?

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A. The rough handling or the handling of a large quantity of TATP is extremely hazardous and dangerous, so yes, it would be a dangerous method of handling it.
Q. Yes. So would you be able to say from what you've seen that it is at least consistent with the TATP having been transferred in the safer method of storage referred to on the video that we've obliquely referred to?
A. I can't say either way based on that video. It's a heavy suitcase, so I can't even say there was definitely TATP within that suitcase.
Q. That's why I put it the way I did. It would be consistent with it having been moved in the way that I have described?
A. Yes, that would be a possibility .
Q. If it was moved in that way, then I think you've agreed already that there would then need to be an additional process at Granby House to ready the TATP prior to the bomb being constructed there?
A. Yes, that is correct.
Q. And again, I don't want you to give any details here, but there was evidence within the flat, wasn't there, that that additional process had taken place there?
A. Yes, there was.
Q. So finally, this, really: you described it as a simple process, it's a simple chemical reaction involved to

\section*{MR JAMIESON: Three supplementary.}

May I ask, please, we have all seen some CCTV footage from 22 May, a little after 9.30 in a lift, with

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Salman Abedi fiddling with some wiring. Is that something that you have seen?
A. This is from the arena?
Q. From the arena.
A. Yes.

MR JAMIESON: I wonder, sir, for ease if we could just play that again at this moment. It lasts, I think, no more than 10 seconds. The reference, please, Mr Lopez, is \{INQ031759/1\}.
(Video played to the inquiry)
Thank you.
Given you said you have seen it before, I'm not going to ask that we watch it again, but the deliberately general question is this: are you able to offer an opinion from that footage as to whether at that point that device was likely to be ready to function or whether some further preparatory step would have been necessary?
A. I can't give an opinion based on that footage.
Q. Thank you. The final question is this: are you able to give an opinion as to whether or not the device would have been ready to function by the fact that subsequent to that, as you've been told already by Mr de la Poer, we understand that the backpack was removed and placed on the floor? Can you help us with whether it's likely
to be ready to function or not?
A. I can't give an opinion as to whether it was fully wired 2 up or not at that stage.
MR JAMIESON: Thank you. Those are the only questions.
SIR JOHN SAUNDERS: That was two not three, so I'll ask one to make up for the third one.

The actual detonation procedure -- and if anyone thinks this shouldn't be asked, please tell me -- would that involve connecting up the sort of wire we saw there to something else?
A. If the circuit contained a switch, it may already have been connected up and it would simply be a case of flicking the switch.
SIR JOHN SAUNDERS: Right, thank you.
MR DE LA POER: Thank you, sir. That then concludes this witness's evidence. I have been asked to put the holding slide up for a moment so Mr Greaney can address you for a very short period of time before inviting you to take lunch.

\section*{(Pause)}

MR GREANEY: Sir, as you will recall, the bomb scene manager, Mr Gallagher, gave evidence a little earlier today about a glass panel falling from the ceiling on to the floor at 10 am on the 23rd. A concern has been expressed on behalf of some of the families to be

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assured that that glass panel did not fall on to their loved ones. I have had a chance to speak to
Mr Gallagher and also to Mr Barraclough and they can be so assured, the panel did not fall on to any of the deceased.
SIR JOHN SAUNDERS: Thank you.
MR GREANEY: Sir, could we now take lunch until 2.35 ?
SIR JOHN SAUNDERS: Okay. Shall we take it 2.30 ?
MR GREANEY: Certainly, sir, yes.
SIR JOHN SAUNDERS: 2.30. Has Ms Philp now finished?
MR GREANEY: Yes, she has now finished.
SIR JOHN SAUNDERS: Thank you. I'm really grateful for you coming to give evidence.
( 1.39 pm )
(The lunch adjournment)
(2.30 pm )

DCS SIMON BARRACLOUGH (continued) Questions from MR DE LA POER
MR DE LA POER: Sir, we are resuming this afternoon with part 2 of Mr Barraclough's statement, which is from page 21 , under the heading "The device and its construction".

Mr Barraclough, we've already heard from Lorna Philp about the device, so I don't need to take you into the finer points of that as they are contained in your
statement.
What we're going to do now is just review what formed the substance of the trial evidence and that's contained in your paragraphs 94 and following. Is that correct?
A. Yes.
Q. So that everybody understands the scale of what we're about to do, the trial of Hashem Abedi began on 27 January of this year with it being opened to the jury on 3 February and verdicts were delivered by the jury on 17 March. Can you confirm that is correct?
A. Yes, that's correct.
Q. So as such, we are looking to condense all of the important parts of that evidence into what we're going to do this afternoon. So it will be an information-rich environment.

We'll begin, please, with where Ms Philp left off in terms of the questions she was being asked by Mr Weatherby and 74 Somerton Court.

Did the investigation conclude, taking into account her information, that is Ms Philp's information, and other factors that 74 Somerton Court was the place in which Salman and Hashem Abedi created TATP?
A. Yes, it did, and that was by virtue of the fact that it must have been because that is the first premises in the

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sequence of events where we find TATP.
Q. When you say first, in fact you identified a number of premises, didn't you, that were connected with this?
A. Yes.
Q. And we're going to look at each of them in detail and you've already introduced them. To put what you just said another way, was the investigation able to identify any other premises in which TATP was created other than 74 Somerton Court?
A. No, we would say it must have been created there because that was the first premises where they spent time and then, subsequent to that, clearly they moved on to other premises where TATP was discovered.
Q. And there was positive evidence of TATP, as we've seen, at 74 Somerton Court; is that correct?
A. Yes, that's right.
Q. And other locations, there was no evidence to suggest that TATP was had been created there, such as the Abedis' home address?
A. That's correct, yes.
Q. The sequence, as we have heard through Mr Weatherby's questioning, and I think that you would accept on behalf of the investigation, was that having been created at 74 Somerton Court, it was transferred to a Nissan Micra; is that right?
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A. That's right, yes. 1
Q. Which was stored at Devell House?
A. Yes.
Q. And then, as we heard in the questioning of
Mr Weatherby, subsequently put into its IED form, so the
explosive was constructed with other parts of the bomb
at Granby Row?
A. That's correct, yes.
Q. Did the investigation consider the capability, so far as
it was able to establish, of Salman and Hashem Abedi to
carry out that process?
A. I think probably the best way of answering this is that
I don't think it's a particularly complicated process.
We had reference to a piece of footage that we believe
may have been seen by the Abedi brothers, if not that
piece of footage at least something that was very
similar to it, and clearly the instruction within
that is a relatively straightforward instruction.
Q. So as part of the investigation, did Operation Manteline
consider the training and qualifications within the
educational establishment in this country of Salman and
Hashem Abedi?
A. Yes, we did, and to what relevance that actually points
at I'm not sure.
Q. Well, it was certainly something you looked at and
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perhaps we can confirm that Hashem completed a level 2
City \& Guilds course in electrical installation at
Manchester College?
A. Yes, that's correct.
Q. Which you describe in your statement as a basic level
course?
A. Yes, it was.
Q. And so far as qualifications above secondary school in
chemistry and/or maths or any other academic discipline
that might be relevant to the manufacture of TATP or the
construction of a bomb, was the investigation able to
establish that they had any such qualifications?
A. No, not to any degree.
Q. But as you have adverted to, there were instructional
videos identified by the investigation?
A. Yes, that's right.
Q. We've already identified them with Ms Philp, but let's
just confirm them now with you. Were they given the
exhibit references CAH/38 and CAH/39?
A. Yes, they were.
Q. And of those two, was the first, CAH/38, considered to
be the more relevant by the investigation?
A. Yes.
Q. Why was that?
A. The video itself is not just about the production of
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TATP, it is the production of a potential device as well. When we look at the similarities between the building of the actual device and the device that's demonstrated, the similarities are remarkable, to such an extent that we were able to adduce this into evidence at the trial even though we could never prove that either Abedi brother had ever watched the actual video itself.
Q. When you say "never proved", is that a reference to the fact that there was no direct evidence of them having watched it?
A. That's precisely right. It goes back to this point of only two devices out of 14 used by the Abedi brothers were ever recovered.
Q. We're just going to briefly summarise the content of that video and we're going to take extreme care as we do so. So let's just deal with it in that way, please. $\mathrm{CAH} / 38$. Is that a video lasting 13 minutes and 51 seconds?
A. Yes, that's correct.
Q. Is it set in what appears to be a domestic kitchen?
A. Yes.
Q. Is it, as Mr Greaney opened this inquiry with in his opening statement, introduced by this:
"Praise is due to Allah, who aided the obedient
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mujahid. He is knowing, hearing, the one who defends the truth. May blessings and peace be upon our prophet Muhammad. My muwahhid brother, today, by Allah's permission, we will learn how to make simple explosive substances with common ingredients, and which you can make in your own home using simple tools. This substance is known as acetone peroxide, commonly known as white ice".
A. Yes.
Q. Does the speaker then go on to instruct how TATP can be created?
A. Yes.
Q. Are further instructions given about how that TATP can be incorporated into an IED?
A. Yes, they are.
Q. As you have said, are those steps, as demonstrated in the video, not those, as we've already heard from our previous witness, requiring laboratory techniques?
A. They require very simple laboratory techniques, but it 's a very straightforward process.
Q. There's another fact about $\mathrm{CAH} / 38$ that may support the proposition that it was watched by the Abedi brothers and that is the date on which it was released. When, so far as the investigation was able to establish, was that video released?
A. That was in November 2016, so it was literally 5 months before the actual attack.
Q. Does that date coincide also with the first identified positive steps by the Abedi brothers to begin to construct their bomb?
A. Yes, it does, shortly after .
Q. So the chronology is that that video became available to those who knew where to find it and, shortly after it did, the first steps were taken by the Abedi brothers to assemble the parts needed for the bomb?
A. Yes. I think the first step is the procurement of the acid or attempted procurement of acid.
Q. We'll come to look at the acquisition of the precursor materials in detail, but without naming them, was the investigation able to establish that, some time around December 2016 into January 2017, there were steps taken by Hashem Abedi to acquire the oil cans that were used in the device?
A. Yes, that's true, yes.
Q. And also around that time, an unsuccessful attempt to acquire a precursor chemical?
A. Yes, that's right.
Q. Let's turn now and run through the chronology which the trial looked at in very considerable detail of the acquisition of precursor materials.

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\{INQ034340/1\}, please. If we can crop into that, please, Mr Lopez.

Is this a schedule, Mr Barraclough, created by your team at the request of the inquiry, which brings together a vast quantity of evidence which underlies the chronology about the acquisition of precursor chemicals?
A. Yes, it does.
Q. We'll read it line by line, or rather row by row, starting with the first row, which we see towards the top left hand corner, 18 January 2017 to 24 January 2017. Did this relate to the purchase of 1 litre of sulphuric acid?
A. Yes.
Q. We can see the price given there of $£ 30.21$, together with the vendor, Restauro Online. Do we see that there was an email address associated with this purchase?
A. Yes, that's right.
Q. Is Alharth Forjani a relative of the Abedi family?
A. Yes, he's a cousin.
Q. Was the investigation able to speak to Mr Forjani about his understanding and involvement in this transaction?
A. Yes, that's right, we did.
Q. Did he provide a witness statement in support of the investigation?
A. He did.
Q. In summary, did he tell the investigation that he was approached by Hashem Abedi in relation to the purchase of sulphuric acid?
A. Yes.
Q. And that it was principally because of his Amazon account that he understood he was being approached?
A. Yes.
Q. And so it was that he came to use his Amazon account to purchase that sulphuric acid?
A. That's right, yes.
Q. We can see that from the next column across that it was Alharth Forjani's bank account that was used to purchase that sulphuric acid; is that right?
A. Yes, that's right.
Q. It was then delivered to an address, we can see that in the next two columns, the address from which it was ordered and that to which it was delivered?
A. Yes.
Q. Then we have the penultimate column, those involved in the transaction, Alharth Forjani on his own admission; is that right?
A. Yes.
Q. And lest there be any doubt about it, did

Alharth Forjani tell the investigation that he did not at any understand at any time that that sulphuric acid

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would be used in connection with a bomb?
A. No, he stated that he believed the account of Hashem Abedi, that it was for a car battery.
Q. And as we've already seen when Mr Greaney was asking you questions, was that one of two explanations that was advanced to a number of people about why that sulphuric acid was necessary?
A. Yes, that's right. That is consistent with all of the purchases of acid.
Q. Was the investigation able to examine Mr Forjani's account in terms of his account with Hashem Abedi, both before and after the purchase, and establish that it was broadly consistent with the account that he had given to the police?
A. Yes, it was consistent.
Q. In the final column, we can see a $Y$ next to that, in other words this was in fact a successful purchase of a precursor material.
A. Yes.
Q. It was delivered to the address that we can see; is that right?
A. Yes, that's right.
Q. And ultimately collected by Hashem Abedi?
A. Yes.
Q. Next, we can see, just a couple of weeks later, if that,

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    the date range 2 March 2017 to 9 March 2017, 5 litres of
    sulphuric acid, more expensive, as might be expected,
    but not five times as expensive, from the same vendor;
    is that right?
A. That's correct, yes.
Q. The email associated with this is a person who's been
    ciphered as Relative C?
A. Yes.
Q. And that is because they are connected to a person who
    is subject to an order of the Crown Court; is that
    right?
A. Yes.
Q. And if their identity was known, then there is a risk
    that there would be an identification of the person that
    the Crown Court has prohibited from being identified?
A. Yes.
Q. We can see that the bank account used was that of
    Relative C. We can see that it was delivered, although
    not where. Perhaps it doesn't matter for our purposes.
A. No.
Q. And there were two people involved in that transaction,
    Hashem Abedi and Relative C?
A. Yes, that's correct.
Q. And that that was successful?
A. Yes.
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## Q. Was Relative C's account similar to that of

 Alharth Forjani in terms of being told that it was for a legitimate purpose?A. Yes, that's correct.
Q. Next, we can see 15 March to 21 March, twice as much as the previous occasion, 10 litres of sulphuric acid. The price is given there, and can we see that it's the same vendor again?
A. Yes, that's right.
Q. There's an email address given there, but that wasn't in fact an indicator of the person who was involved in this transaction; is that right?
A. No, I think you're right. That is right, yes.
Q. Because if we look all the way along to the penultimate column, we can see this is a transaction involving Hashem Abedi and Mohammed Soliman.
A. Yes.
Q. So we've not spoken about Mohammed Soliman yet. Was he an associate of Hashem and Salman Abedi?
A. Yes, he was.
Q. Can you help the inquiry with where, to the best of your knowledge, Mohammed Soliman is right now?
A. We believe Soliman is in Libya at the moment.
Q. Whether that exact location is right or not, is it fair to say that so far as the Operation Manteline team is
concerned, he is not in the jurisdiction?
A. No, he's not.
Q. This was also, as we can see from the final column on this third row, a successful transaction; is that right?
A. It was, yes.
Q. So as at 21 March, a total of 16 litres of sulphuric acid had been obtained by Hashem and Salman Abedi? A. Yes.
Q. And on each occasion, different people were used in the purchase of it by them?
A. Yes, that's correct.
Q. Fourth, we can see that during this period that those 10 litres of sulphuric acid were being delivered,
Salman Abedi and Hashem Abedi's intention turned towards hydrogen peroxide, didn't it?
A. Yes, it did.
Q. So on 19 March, we can see 15 litres of hydrogen peroxide, the price, and a different online vendor; is that right?

## A. Yes, that's right.

Q. In our penultimate column we see a person by the name of Zuhir Nassrat, who is associated with this transaction; is that right?
A. That is correct, yes.
Q. Again with Mr Nassrat, so far as Operation Manteline

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team has been able to establish, is he currently in the jurisdiction?
A. He is not in the jurisdiction. Once again, I don't know whether you want me to be more specific about that.
Q. If you have a location that you're aware of that you're able to disclose.
A. We believe that Mr Nassrat is in Libya.
Q. This is marked as an unsuccessful purchase, in other words that whilst an attempt was made using an email address and Mr Nassrat's bank account, that did not succeed. Can you assist us with why that failed?
A. It failed due to lack of funds in the account and effectively a bank card that was not authorised to work. So from a financial perspective, the transaction did not go through, so it didn't get beyond the Amazon platform.
Q. But not deterred, the next day, is this right, 20 March, a lesser quantity was sought, 10 litres of hydrogen peroxide?
A. Yes, that's right.
Q. It's in fact indicated to be more expensive than the 15 litres, albeit from the same website. Same email address as used previously; is that right?
A. Yes, that's right.
Q. And Mr Nassrat's account also called upon for this transaction?

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A. Yes.
Q. A different address from which it's ordered, but in
    common with the previous address, shall we just note at
    this stage, and we'll come to it in more detail, that
    the delivery address for this and the previous day is
    44 Lindum Street?
A. Yes, that's right.
Q. Was that an important address for the investigation?
A. Yes, this was specifically a delivery address that was
    identified because of these purchases.
Q. We'll come back, won't we, to that? And again we see it
    was unsuccessful?
A. Yes.
Q. A third attempt on the same day in relation to hydrogen
        peroxide, this time from a different vendor; is that
        right?
A. Yes, that's right.
Q. But otherwise using the same email address and the same
        bank account, the same address it's ordered from, the
        same address it's ordered to be delivered to?
A. Yes.
Q. And similarly, unsuccessful?
A. Yes.
Q. Is the explanation for that the same, namely a lack of
funds?
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## A. Yes, that's right.

Q. So at this stage, if we just pause, 16 litres of sulphuric acid successfully obtained but, as yet, no hydrogen peroxide; is that right?
A. That's correct, yes.
Q. But that was to change at the back-end of March when there was an attempt, a successful attempt as it turned out to be, to obtain 25 litres of hydrogen peroxide from the same vendor as had been used on the 20th?
A. Yes.
Q. We've got another name to introduce here, the bank account for that purchase is indicated to belong to Yahya Werfalli; is that right?
A. Yes, that's right.
Q. We can see, if we go down that same column, that all three of these transactions involved his bank account; is that right?
A. Yes, that's correct.
Q. Two of those three, as we see from the final column, were successful?
A. Yes, that's right.
Q. Did Operation Manteline look closely at Yahya Werfalli's involvement in those transactions?
A. Yes, we did.
Q. What was Operation Manteline able to determine from
that?
A. The account that was provided by Werfalli indicated that -- and this is similar, actually, to the attempted purchases of hydrogen peroxide, in that there was a request to use those banking details without an explanation or without explanation as to what was being purchased, except with Werfalli, where he would say and has said that he believed that a fraud was going to be perpetrated and that that fraud effectively would enable him to get some benefit as well as the Abedis.
Q. We're not going to go into the mechanics of the fraud.
A. No, sure.
Q. But there was money to be made by him on his account?
A. Yes.
Q. Dishonestly?
A. Yes.
Q. Did he simultaneously deny any knowledge of the use to which this was going to be put?
A. Yes, he did.
Q. Has Yahya Werfalli in fact been prosecuted for that fraud?
A. He has, yes.
Q. That he pleaded guilty to it?
A. He did.
Q. And I think it was just last week that he was sentenced
for it?
A. He was.
Q. We do need to just consider some further details connected with these last three purchases, all of them for hydrogen peroxide, two successful, as we can see, the final one and the antepenultimate one. Can I just draw your attention to the email addresses that we see connected with these three purchases? The first, changyu7777, what was the investigation able to establish about those?
A. Well, this was -- well, both of these emails were specifically created for this process. In evidence we have said that these are emails that would effectively ascribe to Hashem Abedi. Changyu7777 has no real meaning, but bedap jeana has a very sinister meaning.
Q. You tell us what it means, please.
A. It translate as: we have come to slaughter.
Q. And both those email addresses, as you say, connected back to Hashem Abedi?

## A. Yes.

Q. That's not because he was a subscriber to either of them, is it?
A. No, this is through quite substantial work around provenance. If you need to know the detail of that --
Q. I don't think we do, but I think there are a number of
Q. And 16 litres of sulphuric acid?
A. Yes, that's right.

SIR JOHN SAUNDERS: Before we leave that, Mr Werfalli has pleaded guilty to what: fraud, conspiracy to defraud?
A. It was fraud.

SIR JOHN SAUNDERS: So there was a fraud connected with these transactions as well as being to get hydrogen peroxide?
A. I'd have to check, sir, to be honest. I can't quite remember whether it was an attempted fraud or it may well have been an attempted fraud.
SIR JOHN SAUNDERS: Or a conspiracy to defraud maybe?
A. Yes, I think it might have been an attempt because it was a straight -- very straightforward plan, straightforward ...
SIR JOHN SAUNDERS: I can have it explained to me in due course, no doubt.

MR DE LA POER: We have obtained the sentencing remarks, and so the precise basis upon which he pleaded guilty, and the (overspeaking) will be put before you, sir .

Before we leave Yahya Werfalli, is it also right to say that looking at the telephone traffic that was available to Operation Manteline, there was support for the notion that he thought he was engaged in a fraud?
A. Yes. Really, everything within the investigation was consistent with that story, and indeed Werfalli was not present round delivery or ... We went to some lengths to investigate that.
Q. Thank you. Can I just ask you to keep your voice up, sorry?

You have mentioned delivery, so we'll just put a marker down against 44 Lindum Street, which we're going to come to very shortly indeed.
A. Yes.
Q. Because that was, as you've told us, the delivery address. In terms of the storage of these materials -and I have moved forward now to paragraph 137 of your statement, Mr Barraclough -- did the investigation conclude, as we've perhaps heard already, that by the time Hashem and Salman Abedi went to Libya in April 2017, the TATP had already been manufactured?
A. Yes.
Q. After the brothers had left for Libya, did a person connected with that property, a man called Elwafi, attend 74 Somerton Court to effectively take back possession of it?

## A. Yes, he did.

Q. I've already asked questions about this and referred to Mr Elwafi and what he says he smelt, but did he tell the investigation that when he entered that property, it smelt like a mixture of petrol and diesel?

## A. He did.

Q. Did he discover within the property a number of bottles of liquid that he did not recognise?
A. Yes, that's right.
Q. And because he was clearing the property up, did he inform the investigation that he had thrown them away?
A. He did.
Q. So those items were never recovered by the investigation and precisely what they were has not been able to be definitively established?
A. No, we don't know.
Q. What we're going to just watch now is something that you referred to this morning, Mr Barraclough, and that is the piece of work that was done establishing the transportation of materials from Somerton Court to where they were to be stored whilst the Abedi brothers were in

## Libya.

Mr Lopez, can I invite you, please, to bring up the animation $\{I N Q 033888 / 1\}$ ?

This was obviously prepared for the jury, wasn't it, Mr Barraclough?
A. Yes, it was.
Q. We're going to see the journey on 13 and 14 April, principally because it illustrates, would you agree, the level of investigation that you and your team descended to in order to assess the evidential features in the case against Hashem Abedi?
A. Yes.
Q. There are a number of such animations, we're not going to watch all of them, but this one, given that you mentioned it this morning, we'll consider now.

Perhaps as it's playing, I' Il ask you to pick out items of interest.

Mr Lopez, unless I indicate otherwise, there will be no need to pause.

> (Video played to the inquiry)

We can see here the date range we're concerned with is very shortly before the brothers are to depart on the 15th to Libya; is that right?
A. That's correct, yes.
Q. 21 Elsmore Road is marked. That's the home address of
Salman and Hashem Abedi at that time?
A. Yes, that's correct.Q. And Devell House is also marked. That is, as you'veidentified, and we'll look at in a little more detail ina moment, the place to which a number of the precursorswere delivered?
A. Yes - no, sorry.
Q. Sorry, that's Lindum Street, quite right. Devell House
is where they are to be transported?
A. Yes, that's right, yes. That's effectively where they
will be stored within the parked Micra.
Q. What we're going to see shortly is data points tracking
the journey. That's the Micra; is that right?
A. Yes, that's correct.
Q. We'll come back to it shortly. Is that an image taken
from an automatic number plate recognition system?
A. Yes, it is .
Q. Which permits the identification of that vehicle on the
road at a particular time?
A. Yes.
Q. We can see at this time, it ' II become relevant shortly,
there's contact from the telephone attributed to
Salman Abedi to a taxi company?
A. That's correct, yes.
Q. When we see a green circle with that mast appearing, as
it has towards the top left-hand corner, is that an
indicator of what's called cell site evidence?
A. There are a number of things which prove these journeys.
That is one of them, so that would indicate a cell site
and it would allow us to provide a degree of positioning
in relation to a phone held by an individual at
a particular time when they're using that phone.
Q. And although such masts identify only area, is it
possible to draw inferences when people move between
masts of a direction of travel?
A. Yes, it is, and not just move, they can be static and
we can still draw those inferences in relation to
proximity, direction, et cetera.
Q. We can see indicated now is Somerton Court and ringed in
red, is that the flat that was used by the Abedi
brothers to manufacture TATP?
A. Yes, that's 74 Somerton Court.
Q. So is the inference that is to be drawn that they've
travelled, or Salman at least has travelled, north to
Somerton Court in the Nissan?
A. So --
SIR JOHN SAUNDERS: From home? Is that what's being said?
A. We would say they've both travelled from Elsmore Road
in the same car to --
MR DE LA POER: I think we're about to see some evidence on1
the screen now in support of that. Because although it 's unlikely that they would be standing next to each other, bearing in mind they're calling and texting each other, they're both using masts with their mobile telephones in close proximity?
A. Yes. That's right.
Q. That may be consistent with one of them outside and one of them up in the flat or an arrangement like that?
A. Yes, that's right. That's one having gone in.
Q. Yes.

We see now indicated the taxi that we saw that Salman Abedi had been in contact with twice has now arrived at the Somerton Court area.
A. Yes.
Q. We can see the text at the bottom there that a male has entered the taxi with two bags and two cardboard boxes, requesting to be taken to Rusholme, where he'll tell the taxi driver where to drop him off.

Presumably that account derives from the taxi driver?
A. Yes. Well, that's right, and clearly this is how we recognised that it 's Salman Abedi who has gone into the taxi with these boxes. He also -- the account of the taxi driver would say that he's extremely careful with the boxes when he's handling them.

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Q. We can see here that the investigation is indicating that Salman Abedi is present in that taxi travelling in the direction as indicated. Was it the investigation's theory, and therefore the prosecution's case, that having travelled to Somerton Court, the two brothers separate outside Somerton Court or in the vicinity with Salman Abedi alone making this journey?
A. Yes, that's right. You'll see the difference between the two journeys in that this is a solid orange line because this is the recollection of the taxi driver. The taxi driver remembers the journey and he goes through that journey.
Q. We'll see a blue line journey shortly, which will represent Hashem's journey?
A. Yes, and some of that you'll see is broken, so the line, the blue line, is broken. That's because we are using reference points and we're assuming a particular journey between reference points, if that makes sense.
Q. It certainly does.

The cell site is consistent with Hashem Abedi still being in the Somerton Court area; is that right?
A. That's correct, yes. We would say there's a clear reason why the two have separated in relation to these journeys. There's a reason why Salman Abedi has gotten his boxes and put them in the taxi and gone separately
from Hashem Abedi.
Q. What is that reason?
A. That reason is that he has the explosive, and then travelling separately, there is clearly less danger to the -- well, particularly to his brother.
Q. Here we see that dotted line that you indicated --
A. Yes.
Q. -- and that by approximately 12.40 , it appears that Hashem has set off on a separate journey?
A. Yes.
Q. They travel there in the Nissan so presumably he would have that vehicle available to him.
A. Yes, but there's also, and this is probably something to bear in mind for the future as well is that even at this each stage they have been considering operational security. There's something about, in transporting this material in a taxi, I suppose they've asked themselves the question: are they more or less likely to be stopped by the police or is Hashem more likely to be stopped in the Nissan Micra. So there is something about separating out here and something about, I would say, transporting that explosive in a relatively incongruous way in a taxi and limiting the danger to --
SIR JOHN SAUNDERS: So it's either, we'll blow up the taxi driver in his car rather that ours and Hashem?

## A. Probably, sir, yes.

SIR JOHN SAUNDERS: Or it's done in order to make detection
less likely?
A. Yes, that's right.

SIR JOHN SAUNDERS: Or a combination of both.
A. Yes.

MR DE LA POER: But either way, thought has appeared to have gone into this?
A. Yes.
Q. And care is being taken?
A. You see examples of that all the way through, that there is careful consideration and it is about the operational security of what they're attempting to do.
Q. Of course, it 's important to remind ourselves that at this point, the journey to Libya, the final journey for Salman at any rate, has yet to take place?
A. Yes, that's right. Although it is the next day, literally. Well, it is this day, actually, it's later this day.
SIR JOHN SAUNDERS: So by the time that the Micra sets off, has the taxi arrived?
A. It's still travelling, sir.

SIR JOHN SAUNDERS: Okay.
MR DE LA POER: There was a conversation at, I think, 12.35 or thereabouts between the two brothers.
A. Yes.
Q. And shortly after that, Hashem sets off?
A. Yes. It goes back to the operational security. You see that Salman Abedi is not actually travelling towards Devell House, he goes beyond that and then does a great big loop round and then joins his brother very near to the final destination.
Q. And that is a destination that, as we are seeing now, Hashem appears to be driving directly to?
A. Yes, that's right.
Q. So suggesting that this is part of a prearranged plan?
A. Yes.
Q. This is perhaps the loop or doubling back that you referred to?
A. That's correct.
Q. Having travelled south of where the ultimate destination was, Salman Abedi is now travelling back in the direction, as we can see, clearly in the right-hand pane, of Devell House?
A. Yes.

SIR JOHN SAUNDERS: And you identify the fact that Salman is in the taxi rather than Hashem by descriptions or identification by the taxi driver and phones?
A. Yes.

SIR JOHN SAUNDERS: So you can identify whose phone is

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## whose?

A. That's right. Again, a huge piece of work and quite complex, but when you look at the information that we have in relation to the phones that we've got, we've been able to provenance individual phones for Hashem and Salman.
SIR JOHN SAUNDERS: By saying where they were at a particular time that you knew and where phone calls were done from?
A. Absolutely, and by the context of their calls, by the context of what's been sent to different people, et cetera.
SIR JOHN SAUNDERS: None of the phones were helpfully registered in their names or anything like that?
A. I wouldn't have thought so. But there were also phones we've identified which have had joint use, so both brothers have used them at different times.
SIR JOHN SAUNDERS: Thank you.
MR DE LA POER: We're just at a point here, just after 1 o'clock, when Salman is in close proximity to Devell House. There's contact between him and Hashem, and no doubt evidence from the taxi driver where he was told to stop by the person you've identified as Salman.
A. Yes.
Q. Again are we seeing another example of that, perhaps
what you might call anti-surveillance or awareness of police activity and tactics that the taxi isn't parked at Devell House but instead a short distance away?
A. Yes.
Q. We can see there, and we'll come to this individual tomorrow, but Elyas Elmehdi was contacted by Salman Abedi. Was he a person connected to Devell House?
A. Yes, he was, and I know we're going to come on to him, but he effectively gives permission for the vehicle to be parked there.
Q. Because as we heard this morning, there is a private gated car park at Devell House; is that right?
A. Yes, that's right, although it is probably important to say that from recollection I don't think the gating system actually worked, so it wasn't a secure closed-off area.
Q. We can see from the text at the bottom now that there's a transfer from the taxi to the white car, the Micra no doubt the investigation concluded?
A. Yes, that's right.
Q. The taxi drives off, no doubt to collect another fare.

SIR JOHN SAUNDERS: They do wait, do they, until the taxi has disappeared before they set off for their destination?

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A. Yes, they do, sir.
SIR JOHN SAUNDERS: And they're far enough away from
    Devell House so that no one would have any idea where
    they are going?
A. Absolutely.
MR DE LA POER: We can see where Devell House is marked and
    we can see where the car is. Is there a short journey
    for them to travel between those two points?
A. Yes.
Q. But there's no data to identify precisely by which route
        or at what time?
A. No, because obviously they're together so they are not
        making phone calls, they're both in the same car, and
        we've no reference points on that short journey.
Q. So we've watched that as illustrative of the work that Operation Manteline did, but is one of the things that it illustrates the two brothers working together as part of their plan?
A. Yes, that's right.
Q. Once at Devell House, did the investigation establish that the vehicle was left there for the duration that Salman was in Libya?
A. Yes, it was. I'd have to check exactly how far the CCTV went back, but we know that it was parked on 15 April and we know that Salman Abedi returns to that on 18 May.
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Q. So as to that latter date that you've given, he returns to, that is to say Salman Abedi returns to this country on 18 May; is that right?
A. Yes, that's correct.
Q. And does he visit the Micra that same day?
A. Yes, he does.
Q. Does he visit it for a second time the day after?
A. Yes, he does.
Q. At the time that he visits it on the second occasion, had he by then obtained that large blue Kangol suitcase that we have seen in the footage when this inquiry opened?
A. Yes.
Q. We'll consider the movements of Salman Abedi during this period as captured on CCTV with your colleague,
Detective Sergeant Hazelwood in due course.
A. Of course.
Q. But in summary form, as we have heard this morning, was that suitcase light before the visit and heavy after?

## A. Yes, it was.

Q. Leading the investigation to infer that what had been stored in the Nissan had been transferred into the suitcase?
A. Yes, I think that's entirely accurate.
Q. So having dealt with that I'm just going to acknowledge

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one part of your statement that we are not going to deal with together, Mr Barraclough, before we move on to further topics relating to the planning and preparation by, it was to become, Salman Abedi alone. That is you do provide a short section within your statement of compliance checks in relation to the acquisition of the precursor elements; is that right?
A. Yes, that's right.
Q. But we are not going to deal with that, you and I; it will be dealt with as a subject at chapters 13 and 14 of the inquiry oral evidence hearings and it may well be that there will be other witnesses who will be able to speak to it in greater detail than you can. I'm just acknowledging it to make clear that it is a deliberate omission at this stage.
A. Thank you, Mr de la Poer.
Q. I'm going to go on just to deal with the acquisition of other materials as established by the investigation. Again, we'll look at this in detail with DS Hazelwood, as revealed on the CCTV, and with you when we come to the finances, but were a number of tools and materials acquired by Salman and Hashem Abedi in pursuit of their plot?
A. Yes.
Q. And non-exhaustively, did they include the Karrimor

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rucksack that was used on the 22nd? A very large number of items of shrapnel, as we heard from your colleague this morning?
A. Yes.
Q. Tools and other items associated with the construction of the bomb?
A. Yes, that's right.
Q. And were those items paid for in cash or by reference to debit cards associated either with Salman Abedi or his mother?
A. Both, actually. I think they were routinely a mixture.
Q. We'll have a look at the finances in part 3 of your statement. I would like to consider the items by reference to particular premises and in particular we'll start with 21 Elsmore Road.
21 Elsmore Road was the home address of Salman and Hashem Abedi; is that correct?
A. Yes, that's right.
Q. It was identified by the investigation at an early stage as a property of interest to the investigation; is that right?
A. Yes, that's right.
Q. Were a number of important items of evidence recovered from there?
A. Yes.

\section*{Q. First, were the parts of a number of oil cans, that is}
``` to say industrial or vegetable oil cans, recovered from there?
A. Yes, they were.
Q. Is your colleague, a forensic scientist, Mr Ryder, perhaps the best person for us to deal with that in detail with?
A. I think he' ll explain it very well, yes
Q. He is going to join us tomorrow morning, so we will come to his evidence then.
Was a piece of paper with the email address
bedap7jeana@gmail.com recovered from a bin at 21 Elsmore Road?
A. Yes, it was.
Q. And that's the address with that, as you've described it, sinister translation?
A. Yes.
Q. Were attempts made to see if there was scientific evidence to connect anyone to that piece of paper?
A. Yes, unfortunately, I think they were negative.
Q. But did they include analysing it for fingerprints and DNA?
A. Yes, that's right.
Q. And was it also sent for handwriting analysis?
A. Yes, it was.
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Q. Was that handwriting analysis inconclusive?
A. Yes, it was.
Q. We're going to bring up for the chairman's reference
    a slide that was created for the trial in relation to
    important items recovered from 21 Elsmore Road. We
    won't need to look at it in any detail. {INQ033856/1}.
            Should the chairman in his report or any other core
        participant wish to refer to any part of this, does this
        provide us with a summary of key items seized from
        21 Elsmore Road?
A. Yes, it does.
Q. We can see that distinctive pale yellow and red of the
        oil cans --
A. Yes.
Q. -- which appears a number of times.
            In the bottom right-hand corner of the pane in the
        bottom left-hand corner -- I have not described that
        very carefully, but if you go to the box in the bottom
        left - hand corner, that's nine sub-boxes -- the bottom
        right - hand one, is that the piece of paper with the
        email address on?
A. It's difficult to read, but yes, it is.
Q. So a number of important items and the oil cans we'll
    deal with with Mr Ryder.
        Before we come back to some other properties, let's
                                    1 7 1
    deal with some items that we've mentioned. The Kangol
    suitcase, which as you've established, was used on the
    19 May. Was that acquired the day before?
A. Yes, it was.
Q. So is the chronology that Salman Abedi arrives back
        in the UK, he visits the Micra, and then he purchases
        the Kangol suitcase?
A. Yes, that's right.
Q. Having collected the items as you have described from
        the Nissan on 19 May, does he go on later that day to
        purchase the Karrimor rucksack?
    A. Yes, he does.
Q. So both important items in the chronology of planning,
        preparation, but only acquired very shortly before the
        attack itself?
A. Yes.
Q. Was the Kangol suitcase ever recovered?
A. The Kangol suitcase, no, it wasn't.
Q. But from the CCTV footage, was the investigation able to
    establish its dimensions?
A. Yes, it was. We actually bought an exact copy, as
        we have done with many of the items that have been used
        in this process.
Q. The same is also true of the Karrimor rucksack that --
A. Yes, that's right.
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Q. In relation to the Kangol suitcase was the investigation able to establish that a blue drum of the type, as we shall see, recovered from the Nissan Micra could fit within it?
A. Yes.
Q. So that the public, core participants and the chairman can understand the steps taken, perhaps we'll illustrate one aspect of your investigation by reference to attempts made to find the Kangol suitcase. Perhaps you can tell us what your investigation did so far as that is concerned.
A. I suppose the first phase of this is in relation to the CCTV recovery, so from 18 May to 22 May, we tried to capture every moment we possibly could in relation to Salman Abedi's movements and that left us with a very short window of time actually where there was no coverage that would help us. But in relation to the Kangol suitcase, we are conscious that once it had done its job, it was no longer required and Salman Abedi moves to dispose of that suitcase.

We went through extensive enquiries to try and find that and that took us to the strong belief that it had actually been taken up to Pilsworth tip, rubbish tip, and for the next 12 months we searched for that bag, through some 10,000 tonnes of evidence - - sorry, not --

## SIR JOHN SAUNDERS: You personally?

A. I didn't, thankfully.

SIR JOHN SAUNDERS: You delegated that?
A. But some really amazing people did and they put their heart and soul into it and searched 10,000 tonnes of rubbish, but we never found it. I think as you say, Mr de la Poer, it does demonstrate the lengths to which the investigation has gone to.
SIR JOHN SAUNDERS: At the end of the day, it might have done, but it was unlikely to have added a huge amount to the inquiry.
A. I'm not sure, actually.

SIR JOHN SAUNDERS: Okay.
A. There could have been many things in that suitcase. We had some description of some things that might have been in there.
SIR JOHN SAUNDERS: Right. They might have helped?
A. I would never turn my nose up at evidence. I always welcome it from wherever.
SIR JOHN SAUNDERS: Okay.
MR DE LA POER: So that's the Kangol suitcase.
SIR JOHN SAUNDERS: Was that meant to be a pun, Mr Barraclough?
A. No!

MR DE LA POER: Perhaps we can turn to another area from
A. Ye
Q. Firstly, what led the investigation to the Macdonald hotel area?
A. So once again, this was CCTV recovery and a process of following Salman Abedi through his movements over those days.
Q. Having identified that general area, was there an area of wasteland on Wyre Street?
A. Yes, that's right.
Q. What was recovered from there?
A. This is the rucksack which, when we come on to talk about Salman Abedi's movements, when he arrives in the UK, it's the same rucksack that he is carrying when he comes through passport control.
Q. Also in there was a passport, a Libyan passport in the name of Suleman Ramadan AI Abedi?
A. Yes. That's right.
Q. Was there also Salman Abedi's British passport?
A. Yes, that's true.
Q. A number of other items, including an airline stub?
A. Yes.
Q. What conclusion did the investigation reach about why those materials, including those two passports, had been

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left in that area?
A. So I think if I remember rightly, the two passports were actually in a Timberland bag, but it was very near the actual rucksack. So this, for me, was a final disposal of items which were no longer needed by Salman Abedi. I think probably the telling thing is that the passports have been thrown away. I think part of that is in relation to perhaps concealing identity, but more for me that was a disposal of an item that he no longer needed.
Q. When between the 18 th and the 22 nd was that disposed of?
A. I'd have to refer back to the CCTV SoE.
Q. We'll perhaps deal with that with your colleague Mr Hazelwood.

Certainly when we see Salman Abedi goes into that general vicinity, the investigation concluded that's what he was doing there?
A. Yes, absolutely.
Q. So let's now, to conclude part 2 of your statement, look at some of the addresses in a little more detail, although we have touched on some of this on more than one occasion?
SIR JOHN SAUNDERS: Are we going to deal with mobile phones at some stage? There's nodding from behind.
MR DE LA POER: I wasn't proposing to go to the detail of

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    it, although we can fairly readily bring up an
    attribution.
SIR JOHN SAUNDERS: Can I just ask you a couple of
    straightforward questions. When Salman Abedi arrived
    back into this country, did he have a mobile phone with
    him?
A. Yes, he did. He had the Alcatel, which is the device
    that he took to the arena with him.
SIR JOHN SAUNDERS: Right. Did he get, acquire, another
    mobile phone when he was in this country, when he
    arrived back?
A. Yes.
SIR JOHN SAUNDERS: So he has two mobile phones?
A. Yes, that's right.
SIR JOHN SAUNDERS: What happened to the other mobile phone?
A. The other mobile phone is discarded again. It's
    actually recovered by a witness and then it's brought to
    the attention of the police and the police recover the
    mobile phone and we examine it. But unfortunately, that
    phone has been factory reset. Whether it was factory
    reset by Salman Abedi before he threw it away or whether
    someone else did it, we don't know.
SIR JOHN SAUNDERS: So we don't know, of the two phones
    he had on his return, any of the material which was on
    those phones?
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    SIR JOHN SAUNDERS: If we are coming to that later then we
will leave it until later --
MR DE LA POER: By all means, if it would be helpful to take
us to that --
A. You may have to remind us where it is.
Q. I think it appears in part 4 from recollection, I think
it was a matter that Mr Greaney was expecting --
SIR JOHN SAUNDERS: We'll deal with it when counsel have
intended to deal with it, but we'll bear in mind what
you've told us, thank you.
MR DE LA POER: Sir, if we may, then, we will turn to
page 37 of Mr Barraclough's statement and just deal with
the premises insofar as they've not been dealt with so
far.
A. Sir, could I just make a correction? I'm just conscious
of your interest in this area. I said earlier with the
Alcatel we got nothing back from it. That's not quite
true. When there was an examination of that Alcatel at
a forensic level with proper expertise, there was
a fragment of a shopping list found on the device and
that shopping list --
SIR JOHN SAUNDERS: Okay. I think we will deal with that
at the proper place. That's my fault. I am interested
in it and counsel will bear that in mind when we come to
deal with it.
MR DE LA POER: Certainly, sir. a man called Aimen Elwafi?
A. Yes, he was.
Q. Did the investigation establish that in late 2016 he of that flat?
A. That's right.
Q. Did he also post that same advertisement on what's described as a Libyan Facebook page?
A. Yes. contact with Hashem Abedi on 18 February?
A. Yes, that's right.
A. Yes, it was.
Q. Has Mr Elwafi told the investigation that both he was paid cash for two months' rent?

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## A. There is a part of my statement -- <br> A. There is a part of my statement --

SIR JOHN SAUNDERS: If we are coming to that later then we

MR DE LA POER: By all means, if it would be helpful to take us to that --
A. You may have to remind us where it is.
Q. I think it appears in part 4 from recollection, I think

SIR JOHN SAUNDERS: We'll deal with it when counsel have intended to deal with it, but we'll bear in mind what ,
MR DE LA POER: Sir, if we may, then, we will turn to page 37 of Mr Barraclough's statement and just deal with the premises insofar as they've not been dealt with so of your interest in this area. I said earlier with the Alcatel we got nothing back from it. That's not quite a forensic level with proper expertise, there was fragment of a shopping list found on the device and ping list --
at the proper place. That's in it and counsel will bear that in mind when we come to
A. Yes.
Q. Have we seen the evidence in that comprehensive animation of the attendance at that property by both brothers on 14 April in order to clear it out?
A. That's right, and that fits in with some of the timings. So when you think about the arrangements that were made because Mr Elwafi was not there, there were arrangements to hand the keys to the flat to this friend or intermediary who's mentioned in the statement as well.
Q. We've covered that Mr Elwafi's attendance at the flat after the brothers had cleared it out to find out those items that he disposed of and described that smell that he has.

Just to put it on the record, some of the items recovered from there by the investigation, \{INQ033857/1\}.

It is in a similar form to 21 Elsmore Road. Here perhaps to be considered at more leisure by any core participant who wishes to in due course, do we see a snapshot of various areas that were identified that were connected scientifically, such as through fingerprints, to the two brothers?
A. Yes.
Q. As well as some of the areas that were swabbed for other reasons?

So 74 Somerton Court. We saw this morning that that has trace elements of TATP recovered from it and it is
the place where the investigation considers that the
TATP was manufactured. Was the tenant of that property placed an advertisement on Facebook looking for a sublet
Q. Did the investigation establish through an analysis of the telecommunications evidence that Aimen Elwafi had
Q. Was that one part of the attribution process that was gone went through so far as Hashem Abedi was concerned? Salman Abedi and Hashem Abedi came to view the flat and

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A. Yes, that's right.
Q. Did the investigation conclude that there, together with
    Mr Elwafi's evidence, there was strong evidence that the
    brothers had used those premises?
A. Yes, that's right.
Q. Next, we've referred to it a number of times already,
        the delivery address, 44 Lindum Street. How were Hashem
        and Salman Abedi connected with that, please?
A. They were connected through an individual they knew
        called Hamad and Mr Hamad believed that they had people
        staying with them and therefore was willing to lend them
        the actual premises by virtue of sort of extra space.
Q. Was Hamad's account supported by a person by the namely
        of Dughman?
A. Yes, it was, and Dughman was effectively the person who
        acted as the -- he arranged keys to be given to the
        Abedi brothers.
Q. We have seen on that schedule of precursor materials
        that it was named in the majority of the transactions as
        a delivery address?
A. Yes.
Q. Was the effect of using that to place a layer of
        distance between those who wanted these items and the
        items themselves?
A. Yes. Yes, certainly .
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    Q. Perhaps we can bring up a similar diagram for
Lindum Street. $\{I N Q 033858 / 1\}$. Again not to linger, but
just to acknowledge the key identifications here.
I think these are all references to scientific evidence
that connected Hashem Abedi to the address, namely
fingerprints?
A. Yes, I believe so.
Q. So we've got a visual depiction of the areas in which
those were --
A. And this was literally a delivery address. There was
nothing really otherwise to recover from there.
Q. The third and final property to consider is
apartment 39, Granby House, Granby Row. That was used,
as you've already said, Mr Barraclough, as the place at
which Salman Abedi constructed the bomb. Was it an
address that he had any connection to before 18 May?
A. No, he did not.
Q. But upon his return to the UK, did he make arrangements
through a property company to let the premises?
A. Yes, he did.
Q. Has the owner of those premises been spoken to?
A. Yes, she has.
Q. Has she confirmed her contact with Salman Abedi?
A. Yes, that's right.
Q. Is in fact that contact captured partly on CCTV?
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## A. It is, yes.

Q. Was the sequence in terms of -- and this may begin to assist the chairman in terms of his interest in the mobile phones. You deal with it at paragraph 179. When Salman Abedi returned to the UK to Manchester International Airport, was one of the very first things that he did to purchase a mobile telephone?
A. That's right, yes.
Q. In fact, I have said a mobile telephone. Was it in fact a SIM card?
A. I'm sorry, yes. That was a SIM card, yes. The mobile telephone comes later.
Q. He used that SIM card, you were able to establish, in the Alcatel mobile?
A. Yes, that's correct.
Q. And it was through that means that the owner of the property was contacted?
A. Yes.
Q. One of the things that that owner speaks about is that the agreement was to rent the flat and a car parking space; is that right?
A. Yes, that's correct.
Q. What, if any, conclusion did the investigation reach about why a car parking space might be required for Salman Abedi at this time?

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A. So there are a number of different theories around this and I don't think the car park space cost very much more, so it may have been a "So what, I'll spend an extra $£ 20$ on a car parking space", but that doesn't seem very sensible to me because everything that Salman Abedi and Hashem Abedi have done would suggest that they are very careful about recovery of money. So for me, there was a very specific purpose for that car parking space, and I think the plan was to actually bring the Micra from Devell House to Granby House and put it in that car parking space. But there's clearly a reason why that didn't happen. So there's a reason why Salman Abedi went to check on the Micra on 18 May. There's a reason why he then went back on the 19th with a suitcase to collect things rather than drive the vehicle and we don't know what that reason is.

Clearly, we recovered the car without car keys, so we don't know whether it would start or not. There may have been an issue with that. But it might have been as simple as, again, going back to operational security, which is: if I were to drive that Micra from Devell House to Granby, would that expose me to unnecessary risk if I've got TATP in the boot.
SIR JOHN SAUNDERS: This does all seem to be perfectly sensible, but it's quite speculative.

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A. We don't know.
SIR JOHN SAUNDERS: I wonder whether for the little I have
    seen, compared with what you know, is it really fair to
    say that at the time he returned from Libya,
    Salman Abedi was being careful with money? My
    impression was that he actually got a reasonable amount
    of money out of cash machines and was spending it fairly
    liberally.
A. Yes, he got refunds for things or he attempted to get
        refunds for things and he was very careful to send money
        back to Libya, even on the night he was going to kill
        himself. So I think it is }--|\mathrm{ don't think that's
        speculative, I think that's probably true.
MR DE LA POER: But so far as the car parking space,
        although there are a number of theories, no firm
        conclusion could be reached upon the evidence?
A. No, but I think that there's a reason for that and if
        you've got a car with explosive in, it makes sense to me
        to get yourself a car parking space.
Q. So on the subject of cars, we can conclude your part of
        the evidence before I invite the chairman to take
        a break when we've reached our }90\mathrm{ minutes. Three
        vehicles are connected with this plot; is that right?
A. Yes, that's correct.
Q. The first is a Toyota Aygo; is that right?
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## A. Yes, that's right.

Q. Was that a vehicle that was acquired by Hashem Abedi in January?
A. Yes.
Q. On 23 March, was it involved in a road traffic collision?
A. It was.
Q. Did that lead to reports from witnesses of attempts by the occupants of that car to remove labels from a box or boxes?
A. Yes, that's the account that's been given, yes.
Q. Given the timing of that and where that vehicle was and where it was being driven, did the investigation consider that it was possible, if not likely, that within that vehicle was some of the sulphuric acid that had been obtained?
A. Yes, possibly, or at least labels that might identify that sulphuric acid had been in the boxes.
Q. The two people who were in the car, they fled from it; is that right?
A. Yes, that's right.
Q. And ultimately, was it recovered and scrapped?
A. Yes.
Q. So whatever was in the car has never been recovered by the investigation?

## A. No, that's right.

Q. That meant that a new vehicle needed to be acquired; is that correct?
A. Yes.
Q. And on 24 March, so the next day, did Hashem Abedi acquire a Hyundai Sonata?
A. Yes, that's right.
Q. I think that a message from Zuhir Nassrat's mobile telephone supports that conclusion.
A. Yes.
Q. Did ANPR evidence connect that vehicle to the transportation of hydrogen peroxide?
A. There is an activation of an ANP camera on Upper Chorlton Road in Trafford on 28 March. So it would make sense that it would, yes.
Q. The location is consistent with the hydrogen peroxide?
A. That's right.
Q. Is that vehicle next identified by the investigation on 18 May?
A. That's correct, yes.
Q. Being driven by somebody else?
A. That's right.
Q. When I say somebody else, I mean neither of the Abedi brothers and indeed nobody we've yet mentioned?
A. No.

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## Q. But were items from within that vehicle recovered

 connecting it to the Abedi family?A. Yes, that's right. So just personal items.
Q. We know that just before they depart for Libya, the Nissan Micra is obtained; is that right?
A. Yes, that's right.
Q. That was 13 April and Mr Greaney has already mentioned the individuals who were involved. I think one individual who perhaps wasn't mentioned is Ahmed Taghdi, who is an associate of the Abedi brothers; is that correct?
A. Yes, that's correct.
Q. Was the investigation able to identify any reason why, given that the brothers had the Hyundai, that there was a need to obtain the Nissan?
A. I'm not sure. I don't think they had the Hyundai at the time, did they?
Q. Well, certainly it had been acquired at the end of March. Is it just the case that the investigation hasn't managed to establish what happened to that vehicle?
A. I think that's true, but I think the vehicle had passed on, to be honest. I can always check that.
Q. We're going to -- we've said a lot about the Nissan, the fact that it was parked at Devell House, used for

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    storage. Is it right that, come 1 June 2017, so after
    the attack, the Nissan Micra was located?
A. That's right, yes.
Q. Was it examined for DNA and fingerprints?
A. Yes.
Q. And were the fingerprints and/or DNA of Ismail Abedi and
    Ramadan Abedi, brother and father respectively,
    discovered --
A. Yes.
Q. -- within the vehicle and also that of Ahmed Taghdi?
A. Yes.
Q. The contents of the Micra were of very substantial
    interest to the investigation; is that right?
A. That's right, yes.
Q. I wonder whether we might just conclude this section of
        your evidence, and it will mean an overrun by a couple
        of minutes of our }90\mathrm{ minutes, if we may, of just
        considering the content of that. I' II ask you then
        a couple of questions about it and that should complete
        part 2 of your evidence.
            So can I ask, please, Mr Lopez, that you bring up
        {INQ031713/1}.
            (Video played to the inquiry)
            So indicated there, do we see two of the blue
        barrels that were recovered?
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## A. Yes, that's right.

Q. I think what we're seeing here is a number of documents recovered from within the vehicle connecting it to Hashem Abedi.
A. Yes. Again, this is by virtue of forensic evidence rather than documentary --
Q. Yes. Of course when this animation was prepared and played at the trial, the focus was on looking at what evidence existed which connected Hashem Abedi in particular to this plot?
A. Yes, that's right.
Q. Is it right that this Nissan and its contents formed an important part of that evidence?
A. Very important, yes.

## (Video playing continued)

Q. Were the investigation able to establish what, if anything, the relevance was of this particular container?
A. I'm not sure there was, to be honest.
Q. Rather, is its significance the fact that it connects Hashem Abedi to the car through the fact that there is an object with his fingerprints on it?
A. Yes, but there is $--l$ 'd have to recheck, but there are obviously a number of containers with acid in and I think that will -- as we move through the animation,
the animation will actually assist you.
Q. It perhaps speaks for itself, but inside the lid of that barrel are Hashem Abedi's fingerprints and that barrel contained seven packs of nails?
A. That's right.
Q. Is it right that there were a number of items of potential shrapnel acquired that were not used in the device?
A. Yes, that's right. So once again, the purchases in relation to this material, which was all bought before 15 April, before the Abedis went to Libya, and there's extensive investigation around this, where it's been brought from, when, and how it's been paid for.
Q. I think when we look at your next section, whether that be today or tomorrow, we'll see the schedule of transactions.
A. Yes.
(Video playing continued)
Q. The indication there is a blue barrel. Is it that item that was purchased by the police with a view to seeing if it fitted into the Kangol suitcase?
A. We have those blue barrels and we have obviously the suitcase, yes, but that's the blue barrel. So there are three blue barrels actually in the Micra and we recovered -- there was a further blue barrel at Elsmore.

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Just as you move through the animation, you then see why that might be significant.
Q. This may be material that you had referred to earlier - -
A. Yes.
Q. - - namely some of the precursor chemicals of sulphuric acid recovered.
(Video playing continued)
I think we're about to see metal rings. Can you perhaps tell us what the significance of these are?
A. Yes. If you look at those -- here we go. There's five sets of metal rings. These are seals that go on the blue barrels. Clearly, we've got the three seals that would fit the three blue barrels in the Micra. We've a further seal that would fit a blue barrel back at Elsmore and that would mean that we have one blue barrel that we haven't recovered.
Q. So one blue barrel unaccounted for?
A. That's right.
Q. Which would be consistent with it having been removed in the Kangol suitcase, transporting the TATP to Granby Row?
A. Yes, it would, and an obvious question that goes with that is: if you don't put the seal on, how could you be sure that the barrel would not leak, effectively? But again, we tested that and the actual seal with the --

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Q. Can I just stop you there? I wonder if I might just
deal with this in a different way.
A. Okay.
Q. Just as we conclude this, and I' II just let this
animation complete, as I think it nearly has, and then
I' II come back to that if I may.
A. Of course.
Q. Do we see here then, indicated by the respective
colours, the connection via DNA and fingerprints to the
different items as between Salman and Hashem?
A. That's correct, yes. So as you can see, the
overwhelming forensic evidence relates to Hashem Abedi
in relation to the Micra.
Q. Just dealing with the barrel, if you don't mind,
Mr Barraclough, in this way: did the investigation test
the barrel as a means of transporting TATP?
A. Yes, we did.
Q. And did you conclude that was feasible?
A. It was, yes.
MR DE LA POER: Thank you very much indeed. We're slightly
over the 90 minutes, sir, it 's probably felt like longer
than that for some, but we have completed part 2 and
therefore, I'm sure Mr Barraclough will agree, the
lion's share of evidence heard by the jury earlier this
year.

SIR JOHN SAUNDERS: Can you just help me with one thing, because I am afraid I will forget it otherwise. When Salman Abedi returned from Libya on 18 May and he then rented Granby House, the apartment there, where did he spend the nights? Where did he sleep during that period? Did he go home or did he stay at Granby House?
A. No, sir, he deliberately didn't go home, he stayed at Granby House.
SIR JOHN SAUNDERS: Was there anyone actually at the home living there at the time?
A. I don't believe so, no, the house was empty. I will double-check that. I think the whole purpose of Granby was that he specifically --
SIR JOHN SAUNDERS: I do understand that possibility. Right.
MR DE LA POER: Sir, I'm entirely in your hands how we proceed from here. I'm conscious that we started later than we would have liked to today. If we were to take a short break, we could resume before 4.30 , $I$ suspect it will be tight to finish by 5.00 this next section, or we can leave it until the morning or we can make a start on it. I can say this, that insofar as Mr Greaney and my plan is concerned, we are right now absolutely on target.
SIR JOHN SAUNDERS: If we sit for some more time this
afternoon or without sitting for some more time this afternoon?
MR DE LA POER: As the evidence stands right now, so reaching the end of section 2 with Mr Ryder to start in the morning, which will be evidence pertaining to section 2 , we'll then have a period of time, I estimate around 45 minutes, on section 3 , and then we'll move to the sections that Mr Greaney is going to be dealing with.
SIR JOHN SAUNDERS: If you're on target, then we'll stop now, but if it would be an advantage to carry on for a bit, subject to how you feel about it.
A. I am in your hands, sir.

MR DE LA POER: I can say that we're on target, but whether we remain so remains to be seen. But I am confident that we are where we expected to be right now at the end of the day.
SIR JOHN SAUNDERS: We'll have a break for 10 minutes and then we'll do half an hour more. It may be worth getting ahead given how we do fall behind occasionally.
( 4.10 pm )
(A short break)
( 4.24 pm )
MR DE LA POER: Sir, before we turn to section 3, which is
headed "Finances", I know that Mr Barraclough has, as he

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told us he would, made enquiries of his team in relation to the matter you raised, sir, about 21 Elsmore Road and whether it was occupied.
SIR JOHN SAUNDERS: Thank you for doing that so rapidly.
A. My officers have checked, we did enquiries at the time and we're quite happy it was empty.
SIR JOHN SAUNDERS: Thank you.
MR DE LA POER: Finances, we are looking at paragraphs 195 of your statement and following, Mr Barraclough.

Did the investigation enquire into what bank accounts Salman Abedi held?
A. Yes, we did.
Q. How many were identified during the course of 2017?
A. Two bank accounts were held in 2017, although there was a period where he didn't actually have a bank account.
Q. We'll look at each of those in turn and consider what other evidence there is. Firstly, he had, I believe, a Royal Bank of Scotland account?
A. Yes, that's right.
Q. That was historical in the sense that it was opened many years before, in May 2011; is that right?
A. That's right.
Q. Was that account live throughout the period following May 2011 up to 13 February 2017?
A. Yes, that's correct.

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Q. Was it then closed by the Royal Bank of Scotland on that
        date?
A. Yes, it was.
Q. Has the investigation enquired into the reasons behind
        the bank's decision to close it?
A. Yes. Yes, we have, and the response has been suspected
        fraudulent activity.
Q. We're not going to go into the method of fraud that was
    used, but did the bank's internal procedures identify
    activity that is consistent with a known fraud?
A. Yes, it did.
Q. And as a result, did they withdraw the banking facility
        from Salman Abedi?
A. Yes, that's correct.
SIR JOHN SAUNDERS: And reported it or not?
A. To the police, sir ?
SIR JOHN SAUNDERS: Yes.
A. No, I don't think so
SIR JOHN SAUNDERS: There may be a perfectly good
        explanation for that so I'm not accusing anybody of
        doing anything they shouldn't be doing, but I just
        wished to know.
A. I' II double-check, but I'm pretty sure they didn't.
        I think that's not unusual.
SIR JOHN SAUNDERS:Thank you.
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MR DE LA POER: Dealing with activity on that account before
it was closed, once the plot had started in earnest, by
which I mean precursor elements were being obtained,
were there a number of substantial withdrawals from that
bank account in cash?
A. Yes, that's right.
Q. We'll just identify those. On 22 January, were two sums
totalling $£ 1,600$ withdrawn?
A. Yes, that's right.
Q. And on 24 January, was a further $£ 1,500$ withdrawn in two
tranches?
A. Yes, that's right.
Q. We are going to look in due course at where that money
came from, but bearing in mind that it was at that stage
cash, was the investigation able to identify precisely
what those sums were spent on?
A. I think, again, we're going to a fairly substantial
piece of work which is around the sequence of events and
the detail that sits within that.
Q. Perhaps we'll come to that then.
A. Yes.
Q. We'll park that for the time being.
The bank account having been closed on
13 February 2017, a month later did Salman Abedi apply
to open another bank account?
A. Yes, that's right.
Q. Was that with the Halifax Bank?
A. Yes, it was.
Q. Did that open on 21 March?
A. Yes.
Q. Was that bank account still live at the point of 22 May?
A. Yes, it was.
Q. You mention in your statement a refund and you have adverted to this earlier in answer to questions from the chair in relation to what care or otherwise Salman Abedi took with money. Was he expecting a refund around the time of the attack itself ?
A. Yes, he was.
Q. We'll look at the transaction itself in due course, but had he made an online order for items that were plainly intended to be used as shrapnel in the bomb?
A. Yes, that's right.
Q. And had he reduced that order, meaning that effectively he had overpaid for what he was getting?
A. Yes, that's correct.
Q. Did you identify evidence to indicate that he had been in contact with the bank trying to find out if that refund had landed?
A. Yes, that's right, yes.
Q. This brings us on to something that you mentioned

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earlier, namely a money transfer to Libya. Relevant to that transaction, is there a person by the name of Rabie Zreba?
A. Yes.
Q. He's going to give evidence, we anticipate, next week before the chairman, but is a part that he plays in the chronology of events that he was involved in a money transfer on 22 May?
A. Yes, that's right.
Q. Did the inquiry connect the desire by Salman Abedi to have a refund with his intention to make a transfer on the day of his attack?
SIR JOHN SAUNDERS: Shall we call it the investigation just to avoid --
MR DE LA POER: I beg your pardon. Your investigation.
A. I'm not entirely sure the two are necessarily connected, but that is the pattern of his banking behaviour.
Q. So seeking a refund?
A. Yes.
Q. And shortly thereafter seeking to make a transfer?
A. Yes. But I think this was disposing of the remainder of his money, really, before the attack.
Q. Turning away from Salman Abedi to Hashem Abedi, did he hold a bank account in 2017?
A. Yes, that's right.
Q. Was that a relatively short period that he had access to that --
A. Yes, it was, it was between 17 January and 9 February.
Q. Was that bank account closed by the NatWest Bank?
A. Yes, it was.
Q. Did the investigation establish from the bank that that was because of their concern about what they describe as unsatisfactory conduct?
A. Yes, that's right.
Q. Looking at the reason they give, does it appear to be of a similar type to the concern that caused Salman Abedi's bank account to be closed?
A. Yes, it's consistent with a sort of preparatory act towards a similar sort of pattern of fraud.
Q. That's Salman Abedi and Hashem Abedi. We need now to deal with their mother, Samia Abedi. Did she hold a bank account?
A. Yes, she did.
Q. Did the investigation establish that her account was used by either Salman or Hashem?
A. Yes. There was an element of control over this bank account with Ismail Abedi as the eldest brother, but there was a period of time where the account appeared to be controlled by Hashem and Salman.
Q. Let's just consider that briefly. Was their mother
living in Libya at the time that we're talking about?
A. Yes, that's right.
Q. In other words in 2017?
A. Yes.
Q. So the investigation established that the principal controller of that account, whilst his mother was abroad, was the eldest son, Ismail?
A. Yes.
Q. But I think you've told us the investigation established that there were some transactions which appeared to have been the responsibility of Salman and Hashem?
A. Yes, that's right.
Q. Did the investigation establish whether or not Ismail appeared to know about those transactions?
A. No.
Q. No, he didn't know, or no, you didn't establish?
A. No, we didn't establish it. We've certainly asked the question, but we didn't have the answer.
Q. Certainly is it right to say that Ismail Abedi reported -- forgive me. Ismail Abedi conducted an internet search about lost or stolen cards?
A. Yes.
Q. And the investigation has established from the bank, HSBC, that certainly there was a telephone call made to their hotline?

## A. Yes, which doesn't appear to have been connected. <br> SIR JOHN SAUNDERS: What does that mean? It didn't get through or not connected in substance? <br> A. So probably in the queue, sir, for a period of time. <br> SIR JOHN SAUNDERS: So actually connected by speaking to someone or leaving a message or whatever? <br> A. Yes. <br> SIR JOHN SAUNDERS: Thank you. <br> MR DE LA POER: So as a result of these investigations, did the bank account of the mother of Hashem and Salman also get taken into account in relation to the financing? <br> A. Yes, certainly . <br> Q. Was she the recipient of local authority benefits through that bank account? <br> A. Yes. <br> Q. You've mentioned this already earlier, but is she wanted in connection with enquiries into those benefit claims? <br> A. Yes, that's a matter being handled by the Department of Work and Pensions, so not from a Manteline investigation perspective. <br> Q. Let's just have a look at the sources of funding before we come to look at the expenditure. $\{I N Q 033890 / 1\}$. <br> If we can crop into that so we can see it clearly, <br> Mr Lopez. Thank you very much indeed. <br> We start the review of the finances in October 2016;

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is that right?
A. Yes, that's right.
Q. We can see, on the right-hand side, three columns which indicate which of those three individuals we've been talking about is the recipient of external sources of money; is that right?
A. Yes, that's right.
Q. So a number of those marked in that pinkish colour appear to be payments, in fact all of them looking down there, from the local authority to Hashem and Salman's mother; is that right?
A. Yes, that's right.
Q. We can see that --

SIR JOHN SAUNDERS: Including housing benefit?
MR DE LA POER: Including housing benefit, yes, sir. So far as Salman is concerned, we can see a very substantial, on 6 October, in the form of $£ 1,000$ from the Student Loan Company; is that right?
6 October 2016, four lines or so down, five lines .
A. Yes, you're absolutely right, yes.
Q. In due course, in chapter 13 , there will be considerably more investigation into Salman Abedi's education. But for now, all we need to acknowledge is he was at an educational establishment that qualified him to apply for a student loan; is that right?

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A. Yes, that's correct.
Q. We can also see, towards the bottom, two more orange
    rows indicating payment from an employment agency?
A. Yes.
Q. Over the page {INQ033890/2}, please, Mr Lopez. We're
    coming towards the end of 2016. All of these will be
    totalled at the end so we don't need to keep a running
    track of how much it all adds up to; is that right?
A. Yes, that's right.
Q. We can see the majority of incomes to these three
    accounts are to Hashem and Salman's mother. Again, in
    the form of benefit payments?
A. Yes.
Q. We can see that on 2 January, Hashem Abedi appears to
    receive €1,125. That seems to be by reference to an
    exchange according to the information there.
A. Yes.
Q. Are you able to give us any more information or does
        that speak for itself so far as you are concerned?
A. I actually don't think we have the answer to that, but
        I will check for you.
SIR JOHN SAUNDERS: It looks like he has dollars, he changes
        them to pounds, and changes part of that to euros.
A. Yes, sir, but where the dollars have come from, I'm not
        sure we have the answer to that, but I will check.
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    MR DE LA POER: We can see on 9 January 2017, another
        student loan payment to Salman Abedi in a four-figure
        sum, just over.
    A. Yes.
    SIR JOHN SAUNDERS: I think the evidence is that he wasn't
        actually attending college by that time, is that right,
        or shall I wait for the evidence?
    MR DE LA POER: 13 January, so in answer to your question,
sir, and I'm sure Mr Greaney is right, he was as at that
date, but not as at 4 days later.
SIR JOHN SAUNDERS: Thank you.
MR DE LA POER: Then we can see a deposit of $£ 1,700$ into the
Royal Bank of Scotland account. Was the investigation
able to establish where that had come from?
A. So once again, I think I'd have to check that. I'm not
sure we know again.
Q. Further down in terms of the most substantial payments
in, another $£ 1,500$ deposited into that Royal Bank of
Scotland account for Salman Abedi.
A. Yes, that's right. The thing about this is it is cash,
and we've already talked about fraudulent behaviour
in relation to other accounts, so $I$ think this is part
of the reason why we can't be exactly sure where this
has come from.
Q. Over the page, please $\{$ INQ033890/3 $\}$. We can see a very
substantial payment from the Student Loan Company, twice as much as previously, on 20 January, after, subject to confirmation in the evidence, Salman Abedi has stopped attending his educational establishment. Do you see that?
A. Yes.
Q. Then some more local authority payments to their mother's account and we can see -- I have moved over one -- a deposit into Hashem Abedi's account, forgive me, on 23 January. Is the answer similar to that you gave earlier in terms of the origin of that money or do you know?
A. No, I know that we don't know that. So we definitely don't know where that's come from.
Q. We can see Hashem's account is closed on 9 February, we can then see shortly thereafter the Royal Bank of Scotland terminates their relationship with Salman Abedi.

Some more benefits over the coming 2 months from -month and a half, rather, and we can see Salman Abedi opens his Halifax account, 13 March; is that right?
A. Yes, that's right.
Q. And over the page $\{I N Q 033890 / 4\}$, we can see that there's
a deposit of $£ 100$ into that account, but after Salman
and Hashem Abedi leave the UK, as marked by that grey
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row, there is a further deposit by the Student Loan
Company into Salman Abedi's Halifax account. That's on 24 April?
A. Yes, that's right.
Q. A sum of $£ 2,114.48$. At the bottom of the page we see his return and then, final page $\{I N Q 033890 / 5\}$, please, Mr Lopez, of this, the remaining income items to the three accounts are all by way of benefit figures. Do we see at the bottom there that Salman Abedi has had paid in, in the orange box, just over $£ 10,000$ into his bank accounts?
A. Yes.
Q. The majority of which came from the Student Loan Company?
A. Yes, that's right.
Q. We can see $£ 18,000$ worth of benefits to the mother's account and then those two transactions making up the lion's share of that $£ 3,104$ into Hashem's account?
A. That's correct, yes.
Q. I wonder if overnight, and we've got one more document to look at today, you could investigate for us, Mr Barraclough, those cash inputs to see definitively what, if anything, the investigation was able to establish?
A. Yes, of course.
Q. So we'll turn away from the income that was available and now consider the expenditure that was made, focusing on the period of May 2017, we having reviewed the purchase of the precursor chemicals before that.

Mr Lopez, \{CPS000194/22\}, please. We'll see, this deals with the period starting on 18 January. We won't need to look at all these but perhaps we can show each in turn without needing to conduct a minute analysis. Do we see the way this is laid out, that each of those items that were purchased, as identified by the investigation in pursuit of this plot are identified in that fourth column down?
A. Yes.
Q. And so far as possible, a price has been attributed to them where it is known or where it's discernible from publicly available information. We're going to just start our consideration by looking at the bottom of this page, moving over the precursor chemicals to identify the entry of 25 March 2017. Do we see there that a number of screws and nails were purchased for a total of $£ 59.23$ from a hardware store?
A. Yes.
Q. Were those items amongst those recovered from the Nissan?
A. Yes, that's right.
Q. So items of shrapnel purchased before the departure for Libya?
A. Yes.
Q. Over the page $\{C P S 000194 / 23\}$, please. Do we see that there are some further tools which are purchased and I think the final purchase before departure is the Nissan on 13 April?
A. Yes, that's correct.
Q. Upon Salman's return, do we see that there is a real focus on purchasing items of shrapnel that are used to construct the device itself?
A. Yes, absolutely.
Q. So by this stage, the TATP has been created, the focus has moved on to items which are going to use that explosive and turn it into a bomb?
A. Yes.
Q. If we go over the page $\{$ CPS000194/24\} -- we don't need to look at every line -- do we see, for example, towards the bottom, 20 May, a very large number of items, the number of items in each one is listed by the letters PC, items which were used as shrapnel?
A. That's correct, yes.
Q. We'll look at this with Detective Sergeant Hazelwood, but are we able to see Salman Abedi captured on CCTV purchasing these items?
A. Yes, we are. I think with most of these purchases, throughout this sequence of events, you actually have a CCTV capture.
Q. Over the page, please, $\{C P S 000194 / 25\}$. We can see from the third column that five of the purchases made are from Screwfix; is that right?
A. Yes, that's right.
Q. Over the page again, \{CPS000194/26\}. I think we have moved off the schedule, so if we can just go back that one page. That's my mistake, Mr Lopez. \{CPS000194/25\}.

Do we see that the final purchase was on the 21st, so the day before the attack, at 15.10 ?
A. Yes, that's right.
Q. So no doubt that can all be referred to by core participants in due course, but is that the schedule prepared by your investigation of all of the items that you could identify that were relevant to the planning and preparation of this attack?
A. Yes, that's right. It's just a neat summary of all of them.
Q. Is this a fair conclusion, that although what many people would regard as a lot of money was spent on this, it was well within the means that they had available to them, as we looked at on the income?
A. Yes. Yes, it was.

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SIR JOHN SAUNDERS: So the means of Salman Abedi principally came from student loans? I think there was other income, but it looks like the greatest share of it comes from student loans.
A. Yes. From a personal perspective, student loans, but then the access to their mother's benefit money as well.
SIR JOHN SAUNDERS: We don't know how much Salman or Hashem actually had from that. This is not meant to be a criticism of anybody, this is just simply stating what appears to be a fact, a lot of those student loans were obtained after a time when Salman Abedi was not being a student in any real sense at all.
A. That's right, yes.

SIR JOHN SAUNDERS: Including turning up to an exam in February when he didn't enter anything on the paper and simply went home again?
A. Yes, sir .

SIR JOHN SAUNDERS: Thank you.
MR DE LA POER: Sir, I'm pleased to say that in fact I have completed my review of section 3 faster than I thought and unless you want us to proceed to section 4 --
SIR JOHN SAUNDERS: No, no, thank you very much. I think it's worth going that far, so thank you very much for today, Mr Barraclough, we'll see you back tomorrow morning.

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Is there anything else | need to do?
MR DE LA POER: No, sir.
SIR JOHN SAUNDERS: Right. Thank you all.
(4.50 pm)
    (The inquiry adjourned until 9.30 am on
        Tuesday, }8\mathrm{ December 2020)
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