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Monday, 9 February 2015

(10.00 am)

THE CHAIRMAN: Yes, Mr O'Connor.

Discussion re procedural matters

MR O'CONNOR: May it please you, sir, I wonder if before we embark on today's evidence, it may assist if I provide a brief route map as to the evidence we hope to call for the next week or so.

THE CHAIRMAN: Yes.

MR O'CONNOR: Sir, today we intend to call some evidence about the commercial security and due diligence work that Mr Litvinenko was undertaking in 2005 and 2006. This is intended to be primarily introductory evidence. We will call evidence from the three individuals with whom Mr Litvinenko worked most closely in this regard: Daniel Quirke, Tim Reilly and Dean Attew, during the

1 narrative sections of evidence relating to events
2 in October and November 2006. They will be called later
3 this week and after that.

4 THE CHAIRMAN: Yes.

5 MR O'CONNOR: Sir, that is today. Tomorrow we will call
6 some background evidence relating to Mr Lugovoy and
7 Mr Kovtun and their careers prior to the events in
8 question in late 2006. Then on Wednesday, we will
9 commence the first section of narrative evidence
10 relating to events on 16 to 18 October 2006. The
11 evidence relating to that period is scheduled to occupy
12 us for Wednesday and Thursday of this week and for
13 Monday of next week.

14 Returning to today, sir, I'm afraid we are likely to
15 have a rather short day. We had initially intended to
16 call four witnesses today. It has been agreed that one
17 of those witnesses -- Mr Knuckey -- will not be called
18 and parts of his evidence will instead be read. Another
19 of the witnesses scheduled for today, Mr Hunter, is
20 overseas and so cannot attend today. That leaves us
21 with two witnesses. We think it likely that we will
22 finish their evidence by lunchtime.

23 THE CHAIRMAN: Yes. Yes, thank you very much.

24 MR O'CONNOR: Sir, may we then call the first of today's
25 witnesses, Mr Evans.

1 MR GARYM EVANS (sworn)

2 Questions by MR O'CONNOR

3 MR O'CONNOR: Could you give your full name, please?

4 A. It's Garym Evans.

5 Q. Thank you, Mr Evans. Mr Evans, do sit down, if you
6 would prefer.

7 Mr Evans, as you know, the purpose of this Inquiry
8 is to investigate the circumstances of the death of
9 Alexander Litvinenko in 2006.

10 A. Yes.

11 Q. I think it's right to say that you worked with
12 Mr Litvinenko for three months or so whilst you were
13 employed by RISC Management during the period late
14 2005/early 2006?

15 A. I did, yes.

16 Q. I think it's also right to say you gave a statement to
17 the police about these matters, although only last year,
18 I think?

19 A. That's correct, yes.

20 Q. I don't know if you have a copy of that statement with
21 you in the witness box.

22 A. I don't have it, no.

23 Q. Leave that for now. If you think you need to have
24 a look at it -- have you had a chance to have a look at
25 it again recently?

1 A. Recently, yes.

2 Q. If you think you'd like to look at it, do ask, Mr Evans.

3 Mr Evans, may I first ask you a few background
4 questions. I think it's right to say you worked for the
5 Metropolitan Police for a period of 18 years or so?

6 A. I did, yes.

7 Q. Between 1981 and 1999?

8 A. That's correct.

9 Q. Could you tell us something about the work that you did
10 while you were with the police?

11 A. I started, as everybody did, in uniform patrol for two
12 years. I was then engaged in plain clothes work, moved
13 to the criminal investigation department a few years
14 later, and engaged in criminal investigation department
15 work for the duration of my service with the
16 Metropolitan Police.

17 Q. Until you left in 1999?

18 A. That's correct, yes.

19 Q. What rank were you when you left the police?

20 A. I was detective constable.

21 Q. Thank you. When you left, is it right that you started
22 to work in what we might describe as the commercial
23 security area?

24 A. That's correct, yes.

25 Q. In 2001, you went to work at a company called

1 ISC Global, is that right?

2 A. That's correct, yes.

3 Q. Which was run by two men called Keith Hunter and

4 Nigel Brown?

5 A. It was.

6 Q. Did you know those gentlemen from your time in the

7 police?

8 A. I didn't, no.

9 Q. Is it right that they were both in fact former police

10 officers?

11 A. They were, yes.

12 Q. Could you tell us something about ISC Global, Mr Evans,

13 and the work that it did in those days?

14 A. When I joined, it was a relatively small company with

15 a limited amount of employees, associated quite

16 significantly with a law firm in the West End.

17 Q. Was that a law firm run by a man called Stephen Curtis?

18 A. It was, yes.

19 Q. Did ISC Global have a particular focus on a particular

20 sort of clientele?

21 A. There was some focus on the Russian markets, yes.

22 Q. Was it particularly focused on people who have come to

23 be known as oligarchs, for example Boris Berezovsky and

24 Mr Khodorkovsky?

25 A. It was, but not necessarily in isolation.

1 Q. If not in isolation, what other work?

2 A. It was other markets that were the focus; it wasn't
3 solely the Russian market.

4 Q. Can you give us examples?

5 A. Local UK market.

6 Q. In the period you were there, did you do Russian work,
7 other work or a mixture of all?

8 A. I did a mixture.

9 Q. Did you meet, for example, Boris Berezovsky during that
10 time?

11 A. I met Mr Berezovsky on one occasion briefly, yes.

12 Q. During that time, or afterwards, or can't you remember?

13 A. It was early 2000s somewhere, probably before 2003/2004.

14 Q. Just to be clear, you mean you've met Mr Berezovsky
15 once, ever?

16 A. That's correct, yes.

17 Q. I think you said you started working for ISC Global in
18 2001?

19 A. Yes.

20 Q. Several years later, in 2005, is it right that
21 ISC Global ceased to exist, or at least Mr Hunter and
22 Mr Brown split up?

23 A. They did, yes.

24 Q. Mr Hunter's part of the company merged with another
25 company that was run by a man called Cliff Knuckey, is

1 that right?

2 A. It did, yes.

3 Q. And that business -- I don't need to go into the details
4 of exactly how it came about, but that business became
5 known as RISC Management Limited?

6 A. It did, yes.

7 Q. Did you, having worked for ISC Global, start to work for
8 RISC Management Limited?

9 A. I did, yes.

10 Q. I think it's right that Mr Knuckey was also a former
11 policeman. Did you know him from your time in the
12 police?

13 A. I didn't, no.

14 Q. The merger took place in 2005, and you left
15 RISC Management in early 2006, I think?

16 A. I did, yes.

17 Q. So the questions I'll ask you now are just about that
18 relatively short period of a year or so during the time
19 you worked for RISC Management.

20 A. Yes.

21 Q. We will hear something in the evidence we hear during
22 this Inquiry about RISC Management, and its premises
23 were at 1 Cavendish Place, I believe?

24 A. They were, yes.

25 Q. In Marylebone?

1 A. Yes.

2 Q. Were those the same premises where ISC Global had
3 previously been based or were they different premises?

4 A. They were, although ISC Global had been based in an
5 office nearby for a short period of time, before the
6 Cavendish Square premises.

7 Q. I see. RISC Management Limited, in those times -- so
8 2005/2006 -- can you give us, first of all, an idea of
9 how many people worked there?

10 A. In the region of 20.

11 Q. Is that 20 all told as in fee earners and support staff,
12 or --

13 A. Yes.

14 Q. The company was run by Mr Hunter, was it?

15 A. It was, yes.

16 Q. And below him Mr Knuckey?

17 A. Yes, and there was another person, Mr Brightwell,
18 Tony Brightwell.

19 Q. In the statement you gave to the police, you said that
20 during your time there, you had the position of director
21 of investigations?

22 A. I did, yes.

23 Q. Can you help us to understand what that meant and what
24 the work you undertook was in that role?

25 A. It was work involved in supporting clients on any

1 internal issues that they had, which could predominantly
2 include any sort of investigation, any form of security
3 issue or concern or advice.

4 Q. I wonder if it would help us to get an idea of the range
5 of the work that was undertaken by this company if we
6 could have a look at a document which is in fact a page
7 of Mr Hunter's statement. I wonder if we could have up
8 on the screens, please, INQ015802.

9 Now, Mr Evans, this is, as I say, a page of
10 Mr Hunter's statement, and you'll see that at the very
11 top there, he says that:

12 "RISC currently undertakes the following business
13 functions ..."

14 Just so we all know, this was a statement that he
15 gave in 2013, so he was describing the functions of RISC
16 some years after the events we're looking at. But if
17 you cast your eye down the page, you'll see that he
18 talks about core services and gives a number of examples
19 of those services, specialist services, again a number
20 of examples, and then client services; and just for
21 completeness, I wonder if we could briefly go over the
22 page to the next page, please, and you'll see that
23 client services, there are two more over the page. Do
24 you see that, Mr Evans?

25 A. Yes.

1 Q. Perhaps we can go back to the page before.

2 Mr Evans, allowing for the fact that this is
3 Mr Hunter's statement, and also it's a statement he gave
4 about the company a few years after you left, are you
5 able to help us, using these bullet points, just to give
6 us a little idea of what RISC Management did in the time
7 that we are looking at, that is 2005/2006?

8 A. Yes.

9 Q. First of all, core services, we see corporate
10 investigation and litigation support, business
11 intelligence, security risk management, cyber-risk
12 analysis, intellectual property protection, money
13 laundering, or anti-money laundering I should say,
14 corporate due diligence, personal due diligence,
15 reputational issues, employee fraud investigations and
16 physical security protection.

17 The first thing to say about those is one imagines
18 there's a fair degree of overlap between those various
19 different areas?

20 A. Quite a lot, yes.

21 Q. Tell us a little bit about due diligence; what is meant
22 by that phrase?

23 A. I would interpret due diligence as gathering all
24 available factual information around background involved
25 in a particular event or transaction.

1 Q. What might be the circumstances where RISC Management
2 would have been asked to provide some due diligence?

3 A. Any sort of relationship that might have been impending,
4 or a breakdown in a relationship that -- basically need
5 to go back and look at facts that existed.

6 Q. A company that was considering entering into
7 a transaction might simply use its professional advisers
8 to undertake due diligence, for example accountants or
9 lawyers. What were the specialist services that
10 RISC Management offered in this regard?

11 A. Leveraging support from contacts and networks and closer
12 to the ground in a particular area of jurisdiction.

13 Q. You say jurisdiction; is it right that some of the work
14 that you would have undertaken in the due diligence
15 field was overseas?

16 A. Correct, yes.

17 Q. Most of it?

18 A. I wouldn't necessarily say most of it. A good
19 percentage, yes.

20 Q. We've talked a little about the work that
21 RISC Management did in the Russian sector. Was this
22 a feature of the work that was undertaken in this
23 sector, due diligence?

24 A. It was, yes.

25 Q. Was this work that you particularly were involved with,

1 or was it others within RISC Management?

2 A. More others than myself.

3 Q. Now, business intelligence, is that something different
4 from due diligence, or is it much the same as we've just
5 been discussing?

6 A. I would say it's a little bit different in that you're
7 looking at a different base of not necessarily facts, it
8 may be a combination of different pieces of information
9 that are merged together to draw a best conclusion.

10 Q. What about reputational issues?

11 A. I guess that would be pretty close to either or both of
12 the others.

13 Q. We sometimes see a suggestion in some of the evidence
14 that individuals might actually seek out information
15 that might damage the reputation of their business
16 rivals. Was that work that RISC undertook in this
17 field?

18 A. I don't recall any specific examples of that. One could
19 look at reputational risk for their own reputation as
20 much as a third party's reputation.

21 Q. The various areas of work that we've been discussing
22 here, was it customary to use sources in these types of
23 work?

24 A. There would be occasions when sources would be used,
25 yes.

1 Q. Is that something that you were particularly involved in
2 or more others?

3 A. To a certain extent, but not a greater extent.

4 Q. Just carrying on down the list, specialist services, we
5 see surveillance, kidnap ransom assessments, close
6 protection. These seem to have a feel of more physical
7 activity about them.

8 A. They would be, yes.

9 Q. Were they more or less typical of the work that
10 RISC Management did as opposed to the core services
11 we've looked at above?

12 A. There would be a good percentage of examples of that
13 type of work going on quite a lot of the time.

14 Q. Your own work, were you more focused on the core
15 services or the specialist services?

16 A. On both.

17 Q. Then finally, client services, we see references to
18 taxation, accountancy, immigration, investment,
19 insurance. Can you tell us a little about that work?

20 A. I can't say that I was particularly close to those
21 services. I had a small amount of involvement with
22 insurance services.

23 Q. I see. Thank you very much. I think we can take that
24 off the screen for the moment.

25 I take it that at the time we're looking at --

1 2005/2006 -- RISC was not the only company in London
2 that provided the type of services we've just been
3 discussing.

4 A. Correct.

5 Q. We will hear evidence about one other company that
6 provided services which, as we understand it, were
7 similar. That is Titon International. Were you aware
8 of that company at the time?

9 A. I don't recall the name at all, no.

10 Q. Can you give us an idea as to whether this type of work
11 at the time was a growth area or not?

12 A. I would say that it was more a growth area than not.
13 I'm not sure I would be able to judge if it was a high
14 growth area. It seemed to be developing at the time,
15 yes.

16 Q. You were busy, were you?

17 A. We were very busy, yes.

18 Q. Both ISC Global and subsequently RISC Management?

19 A. Yes.

20 Q. You've mentioned confidential sources briefly. I want
21 to ask you a few questions about that if I may. We've
22 heard that your job was as director of investigations.
23 Did that actually involve you using confidential
24 sources?

25 A. Sources, I'm not sure how much I would stretch the word

1 "confidential".

2 Q. Tell us -- that was a piece of jargon that I used, what
3 would you see as the distinction between a source and
4 a confidential source?

5 A. It's difficult to say. I mean, I've certainly used
6 sources. I suppose by the nature of them you'd probably
7 call them confidential, but it looks a lot more
8 mysterious when you add the word "confidential",
9 I guess. At the time, it was people that I was involved
10 with who provided background facts and background
11 information who probably wouldn't necessarily always
12 consider themselves as confidential sources per se.

13 Q. I imagine it was of the essence of your work to have
14 what we might describe as "contacts"?

15 A. Absolutely, yes.

16 Q. People who knew more about particular areas of business
17 or different jurisdictions than you did.

18 A. Yes.

19 Q. And that if you needed their help, you could pick up the
20 phone and ask them to fill you in on a particular person
21 or issue?

22 A. That would be one example, yes.

23 Q. Those would be people you might describe as "sources"?

24 A. Yes.

25 Q. Did you ever use sources who you might task to try to

1 find out a particular piece of information?

2 A. Yes.

3 Q. Would that include tasking people to find out
4 information about overseas jurisdictions?

5 A. Yes.

6 Q. Russia?

7 A. I don't recall Russia extensively. Parts of Europe,
8 yes.

9 Q. These individuals who you might task to make enquiries
10 on your behalf, would they, for example, be paid for the
11 work that you did?

12 A. They could be, yes.

13 Q. Was there any standard about this, or was it very much
14 each different circumstance had a different
15 consideration?

16 A. It certainly wasn't the standard. It would be each
17 circumstance would dictate.

18 Q. Did you have, as it were, a group of people who you used
19 frequently to conduct investigations of this nature for
20 you?

21 A. I wouldn't describe it like that, no. Not in terms of
22 the confidential source situation, no.

23 Q. If you were tasking, as it were, someone to make these
24 investigations, would you have to get clearance within
25 your company to do that, or was that simply a decision

1 you could make?

2 A. I think there would be dialogue around the progress of
3 a task or investigation. I'm not sure that I would
4 have -- I can't think of an instance where I would
5 independently make key decisions about how tasking went
6 forwards.

7 Q. What about equipment? Would you sometimes provide
8 people who you were asking to investigate certain issues
9 with equipment of any sort to do that work?

10 A. Not normally, no.

11 Q. Did you see it as part of your role to consider whether
12 these people might be putting themselves at risk by
13 making these investigations for you?

14 A. Absolutely, yes.

15 Q. Tell us more about that.

16 A. Well, from the situations that I was directly involved
17 with, I can't think of too many situations that were
18 high risk.

19 Q. I suppose that risk of this nature might fall into at
20 least two parts. The first would be people actually
21 putting themselves at physical risk by trying to access
22 files or buildings to find out information for you.

23 A. That's certainly not the scenario that I was involved
24 in. It was more about leveraging information that they
25 knew or was readily accessible through their networks,

1 as opposed to a description of going through files and
2 so forth.

3 So situations that I wouldn't envisage would present
4 any danger.

5 Q. What about a different sort of risk, a risk that someone
6 might expose themselves to, not by the physical exercise
7 of obtaining information, but by it becoming known that
8 they had provided you with a particular piece of
9 information, for example about a particular person?

10 A. I'm sure there would be risks associated with that.
11 I don't recall an instance where that presented itself
12 as an issue.

13 Q. That may be where we get back to the idea of
14 confidentiality. Was there a practice of keeping
15 confidential information that people supplied to you, or
16 at least as confidential as possible?

17 A. By the nature of it, yes.

18 Q. When information was obtained for you by sources in the
19 sort of circumstances we've described, would you
20 necessarily be aware of precisely how they had obtained
21 that information?

22 A. No, not always, no.

23 Q. Were there any conventions or instructions you gave them
24 about what they should or shouldn't do in obtaining it?

25 A. I don't recall that situation materialising in any one

1 of the conversations that I had, no.

2 Q. Once a source had provided you with information,
3 I imagine you needed to assess how valuable that
4 information was?

5 A. Yes.

6 Q. One question that would arise, first of all, is whether
7 the information was actually accurate or not.

8 A. Absolutely, yes.

9 Q. Were there ways that you had to work that out?

10 A. Trying to validate any form of information or
11 intelligence would be key, clearly utilising other
12 sources or other information portals to try and verify
13 or apply any accuracy to that sort of intelligence.

14 Q. Did you have people who you would, as it were -- who you
15 would run past the information that you'd received?

16 A. I'm not sure I'd describe it like that. It was each
17 case on its merits. It may be impossible to validate
18 any level of information; it may be impossible to
19 substantiate or add substance to some of the
20 information.

21 Q. Turning, then, if we may, to Mr Litvinenko and your
22 relationship with him. First of all, I think it's right
23 that you knew him as Alexander?

24 A. I did, yes.

25 Q. Some people knew him as Sasha, others as Alexander. You

1 knew him as Alexander?

2 A. I did, yes.

3 Q. You didn't speak Russian?

4 A. Not at all.

5 Q. You still don't?

6 A. Absolutely not, no.

7 Q. Can you tell us when it was that you first met

8 Mr Litvinenko?

9 A. It was middle of the way through 2005.

10 Q. Was he introduced to you by someone in the firm or --

11 A. He was, yes.

12 Q. Can you remember who?

13 A. I can't. It was either Mr Knuckey or Mr Hunter, or

14 both.

15 Q. Did you start working with him at that time or was it

16 later that you started working with him?

17 A. Pretty close to that time.

18 Q. Do you recall, then, that whoever it was who introduced

19 you to him, Mr Knuckey or Mr Hunter, as it were, told

20 you: here's Mr Litvinenko, I want you to work with him;

21 or was it your idea?

22 A. Words to that effect, yes.

23 Q. I see. Then you worked with him from that time, so

24 roughly the middle of 2005 until the time that you left

25 RISC?

1 A. Yes.

2 Q. I think end of January/February 2006?

3 A. Yes.

4 Q. I think we'll hear that when you left, another employee
5 of RISC, Mr Quirke, as it were, took over the
6 relationship with Mr Litvinenko?

7 A. He did, yes.

8 Q. We'll hear from him next week.

9 What was your general impression of Mr Litvinenko
10 that you formed over the time that you worked with him?

11 A. He was a complex individual that took some
12 understanding, or trying to understand was very
13 difficult. Quite an amenable individual who I liked as
14 an individual.

15 Q. How often do you think you met him over the period of
16 six months or so that you worked with him?

17 A. I think the window of time that I met him was shorter
18 than six months, it was probably closer to three or four
19 months, and I would estimate in the region of seven,
20 eight times, possibly one or two more, one or two less.

21 Q. Where did your meetings take place?

22 A. At the RISC offices.

23 Q. Roughly speaking, how long would these meetings last?

24 A. From memory, 30 minutes and slightly more. There may
25 have been one or two that lasted up to an hour.

1 Q. In the statement that you gave to the police, you had
2 obviously been asked to describe the work that you did
3 with Mr Litvinenko, and you said that you were tasked
4 with -- the quote was "looking after Mr Litvinenko", but
5 you wouldn't describe yourself as being a source handler
6 in respect of him. Can you explain a little more about
7 what you meant by that?

8 A. I got the impression that he'd been working closely with
9 colleagues at RISC and that the relationship maybe was
10 going to be slightly different and that I was given the
11 role of communicating with him, speaking with him, and
12 developing a role possibly in a different way to that
13 that had been done before.

14 Q. Did you have any greater understanding than you've just
15 given us of the work that he may have been doing before
16 you became involved?

17 A. No, I didn't, no.

18 Q. So while you were involved, what took place during your
19 meetings? What was the subject matter of your
20 discussions?

21 A. It was conversations around the Russian landscape,
22 around the political picture and maybe filling in gaps
23 in my knowledge.

24 Q. Was this gaps that you needed filling in for
25 a particular purpose?

1 A. General background predominantly. There may have been
2 some investigations or issues that were ongoing that it
3 would have been helpful to have had those gaps filled.

4 Q. We've been talking, for example, about due diligence
5 reports.

6 A. Yes.

7 Q. Did you use information that he'd given you for the
8 purposes of any due diligence reports that you were
9 preparing?

10 A. No.

11 Q. Did you ask him to prepare due diligence reports for
12 you?

13 A. No, I think out of conversations that he produced some
14 materials. I don't recall that they were directly
15 related to anything where there was a due diligence
16 task.

17 Q. Another comment that you made in the police statement
18 that you gave was that the relationship between
19 Mr Litvinenko and your firm was unusual. What did you
20 mean by that?

21 A. It wasn't a relationship that I'd experienced before
22 with RISC. He'd obviously had some history with
23 Mr Hunter and Mr Knuckey over a protracted period of
24 time, the details of which I don't think I was fully
25 aware of at any particular time ahead of that.

1 Q. Did you get a sense, for example, that Mr Hunter and
2 Mr Knuckey were trying to bring him in to work in
3 circumstances where otherwise he may not have had that
4 work?

5 A. I'm not sure I got that impression. I got the
6 impression that he was, you know, an individual that was
7 good to have a relationship with in terms of keeping the
8 channel of communication open.

9 Q. I see. What about the reliability of the information
10 that Mr Litvinenko provided you with? Were you able to
11 form a view as to, for example, how original it was or
12 how accurate it was?

13 A. The information that he provided wasn't necessarily
14 a tasking -- it was general information or material that
15 he produced, and it wasn't necessarily that he produced
16 it by direct request or something that I was
17 particularly interested in, so the material that he
18 produced wasn't necessarily going to be good or bad.
19 However, I don't recall it having a sense of being
20 original. It looked like it probably was more widely
21 available than the information available to a source.

22 Q. Do you know where he got the information?

23 A. No idea.

24 Q. You mention in your statement that some of the
25 discussions you had with him involved conspiracy

1 theories.

2 A. Yes.

3 Q. Was that a flavour of the discussions you had with him?

4 A. Quite a dominant feature, yes.

5 Q. Can you expand?

6 A. In relation to any given subject, the conversation would

7 develop into something quite far-reaching and quite

8 complex that was really difficult to grasp, how it would

9 change from one topic to another, and deeper issues,

10 deeper questions, deeper answers and very complex.

11 I probably got quite lost a lot of the time in terms of

12 who was going where and why.

13 Q. You mention in your statement that towards the beginning

14 of the period that you met with Mr Litvinenko, you

15 provided him with, as you put it, a couple of phones and

16 SIM cards.

17 A. I did, yes.

18 Q. Do you recall why you did that or at whose request that

19 was done?

20 A. That was at his request, in relation to develop his

21 conversations with his contacts.

22 Q. Did that seem unusual to you?

23 A. Partially unusual, yes.

24 Q. But not so unusual that you considered not doing it?

25 A. There didn't seem a reason not to do it.

1 Q. You provided him with the phones from the company's
2 resources, I imagine?

3 A. Yes.

4 Q. Did he ever say any more about the phones or the SIM
5 cards, what he was using them for?

6 A. Not to my recollection, no.

7 Q. Did you ask him?

8 A. I don't recall, no.

9 Q. Did he make any other requests like that or any other
10 comments to suggest that he was, as it were, himself
11 using contacts to obtain information?

12 A. I took it for granted that he had a network of contacts
13 that he was communicating with or individuals that he
14 was communicating with. I don't recall specifically
15 speaking about any particular contact.

16 Q. Did you encourage him to use that network of contacts to
17 find information for you?

18 A. It was an assumption that I made that he relied on his
19 network of contacts as part of his day-to-day
20 activities.

21 Q. What about, Mr Evans, payments? Do you recall ever
22 paying any money to Mr Litvinenko at all?

23 A. No, I don't, no.

24 Q. Would you have expected to pay someone like
25 Mr Litvinenko for the sort of information that he

1 provided you in 2005 and 2006?

2 A. No.

3 Q. We will hear that Mr Knuckey recalls that you paid
4 Mr Litvinenko GBP 1,000 in cash in 2005. What's your
5 memory of that?

6 A. I've got no recollection of paying that sum of money.
7 I have a vague recollection of a sum of money for
8 expenses being mentioned in dialogue with him and the
9 figure would have been closer to GBP 100 than 1,000. My
10 recollection is that I never reached the stage where
11 that was given to him.

12 Q. Was it common for sources, if I can put it that way, to
13 be paid in cash?

14 A. It wouldn't be uncommon.

15 Q. Help us with this, GBP 1,000, from the reaction that
16 you've given, GBP 1,000 would have been quite a large
17 sum of money to pay to a source, is that right?

18 A. Under the circumstances that you've described based on
19 my recollection of Mr Litvinenko, yes.

20 Q. Does it follow from what you're saying that you have no
21 memory of this, and you also think it quite unlikely
22 that a sum of that money, that amount, would have been
23 paid to Mr Litvinenko?

24 A. Certainly not GBP 1,000 to my memory, no.

25 Q. We will hear evidence that Mr Litvinenko around this

1 time was not simply providing information to you and to
2 RISC but to one or two other similar companies. Would
3 that have struck you as unusual at the time?

4 A. No.

5 Q. Was there anything wrong with him dealing with other
6 companies as well as you?

7 A. Not at all, no.

8 Q. Do you have any knowledge at all of an incident that
9 took place before the period we've been talking about?
10 You have said that you became involved with
11 Mr Litvinenko in 2005. In late 2004, there is evidence
12 that Mr Litvinenko's house was attacked and Mr Knuckey
13 prepared a report into not only that, but also the
14 events that preceded it. Does that ring any bells with
15 you at all?

16 A. The first time I've heard it was his house. I was aware
17 of an incident of a property being attacked. I had no
18 understanding that it was Mr Litvinenko's, and I hadn't
19 made the association between that event and
20 Mr Litvinenko at the time, certainly the early stages
21 that I spoke with him.

22 Q. You weren't involved at all in whatever investigations
23 took place by Mr Knuckey?

24 A. Not at all, no.

25 Q. Just a few questions, if I may, Mr Evans, about specific

1 issues that Mr Litvinenko may or may not have been asked
2 information about by you.

3 First of all, Yukos, a large Russian oil firm. Do
4 you recall whether Mr Litvinenko provided any
5 information or, to use another word, intelligence
6 relating to Yukos?

7 A. Not during my conversations with him, no.

8 Q. We may hear evidence that Mr Litvinenko was tasked to
9 investigate a man called Vladimir Loginov, a Russian
10 agriculture minister. Again, do you have any memory of
11 that?

12 A. I don't recall the name, no. The name -- the reference
13 to agriculture resonates in my mind, but I can't
14 directly associate it with conversations with
15 Mr Litvinenko.

16 Q. Do you know whether Mr Litvinenko ever provided any
17 information about or was tasked to investigate
18 Boris Berezovsky?

19 A. No, no idea at all, no.

20 Q. And no such information passed to you?

21 A. Absolutely not, no.

22 Q. Did he ever travel abroad to your knowledge in
23 connection with information he was providing to you?

24 A. Not in relation to the information provided to me, no.
25 He mentioned Italy from my recollection. I don't recall

1 whether he'd been there. That's the only reference to
2 "abroad" that I can recall.

3 Q. You certainly didn't ask him or task him to travel?

4 A. No, not -- no.

5 Q. Were you aware, Mr Evans, of any reason why
6 Mr Litvinenko may have been placed at risk for the work
7 that he did for you or, to put it another way, the
8 information that he provided to you?

9 A. None whatsoever, no.

10 Q. You mention in your witness statement that Mr Litvinenko
11 used to bring others into the office with him.

12 A. Yes.

13 Q. I presume is this when he came to meet you or on other
14 occasions?

15 A. On other occasions, but certainly on one occasion at
16 least when I was there.

17 Q. Do you recall who he used to bring in or what type of
18 person he used to bring into the office?

19 A. No, it looked more like legal people before I was
20 speaking with him.

21 Q. You say it looked like a legal person?

22 A. Looked, yes.

23 Q. I won't ask you what a legal person looks like.

24 A. I don't recall whether it is because I recognised them
25 from previous meetings with lawyers.

1 Q. I see. But this was before that period when you had
2 involvement with him?

3 A. Yes.

4 Q. Did you know of or know at the time a man called
5 Andrei Lugovoy?

6 A. I heard of and I met him on one occasion at the offices.

7 Q. When you say you'd heard of him, do you mean you've
8 heard of him now or you think you'd heard of him at the
9 time?

10 A. A bit of both. Obviously I met someone I believed was
11 him. I don't recall the circumstances that led up to
12 that in terms of my knowledge of him, but obviously
13 since then I've heard a significant amount about him.

14 Q. Of course. But this memory you have of knowing of
15 him -- and I think you said meeting him -- was that in
16 the period we're discussing, late 2005?

17 A. It was, yes.

18 Q. Can you be more precise than that?

19 A. I can't. The last quarter of 2005 is the best memory
20 I have.

21 Q. Do you recall whether you met him with Mr Litvinenko?

22 A. It was with Mr Litvinenko, yes.

23 Q. Do you recall whether there were any others present at
24 that meeting?

25 A. I don't recall, no.

1 Q. First of all, anyone else from RISC, for example
2 Mr Knuckey or Mr Quirke?

3 A. I would imagine there would have been somebody else from
4 RISC there, yes.

5 Q. But you don't remember?

6 A. I don't recall, no.

7 Q. Can you tell us, who might it have been?

8 A. I would think that Mr Knuckey would have been there.

9 Q. What about any other, for example, associates of
10 Mr Lugovoy; did you ever know Mr Kovtun?

11 A. No.

12 Q. Have you subsequently seen photographs of him?

13 A. Not that I recall. I may have seen something on the
14 media.

15 Q. But you have no memory at all of meeting --

16 A. No.

17 Q. -- any other --

18 A. No, I don't.

19 Q. -- associates of Mr Lugovoy?

20 A. No.

21 MR O'CONNOR: Thank you. Thank you, Mr Evans. Those are
22 all my questions.

23 MR EMMERSON: With your permission, I have one matter
24 I wanted to ask the witness.

25 THE CHAIRMAN: Yes, Mr Emmerson.

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Questions by MR EMMERSON

MR EMMERSON: You've told us that you had, I think you thought, roughly seven or eight meetings with Mr Litvinenko, that he provided you with information and that the firm supplied him with telephones and SIM cards.

A. Yes.

Q. So there was a working relationship, would you accept that?

A. Absolutely, yes.

Q. You also told us that there was, as far as you knew, no payment to Mr Litvinenko, is that right?

A. During the time that I was speaking with him, yes.

Q. What do you understand his motive to be for working with your company, then?

A. I felt that he was to a certain extent keeping himself occupied, that was one part of my understanding, and that possibly looking at where his future employment might be and what he might be doing.

Q. You thought he was building a relationship with the company --

A. To a certain extent, I felt that was part of it, yes.

Q. -- with a view in effect to creating an investment that might provide him with paid work in the future, is that your --

1 A. I don't know I would go that far, but certainly I got
2 the sense that he was keen to keep himself occupied and
3 seemed to be considering his future income.

4 Q. Did it strike you as odd at all that someone would put
5 that much effort into helping you for no money?

6 A. I formed a view that he had his own agenda and it was
7 very, very difficult to fully understand his
8 motivations.

9 MR EMMERSON: Yes, thank you.

10 THE CHAIRMAN: Yes, Mr Evans, thank you very much indeed.

11 MR O'CONNOR: Thank you, Mr Evans.

12 THE CHAIRMAN: Yes, Mr O'Connor?

13 MR O'CONNOR: The next matter is to read a section of
14 Mr Knuckey's evidence. We do, I'm sorry to say, need to
15 take a short break before we do that, because some of
16 the material in question hasn't yet been loaded on to
17 the system. I wonder, although it's early, if we may
18 simply take a short break before we come back to
19 Mr Knuckey's evidence.

20 THE CHAIRMAN: Yes, very well.

21 (10.42 am)

22 (A short break)

23 (10.54 am)

24 THE CHAIRMAN: Yes, Mr O'Connor.

25

1 MR CLIFF KNUCKEY (evidence read)

2 MR O'CONNOR: Sir, as I said earlier, the next stage of this
3 morning's proceedings is to read some evidence from
4 Mr Knuckey.

5 THE CHAIRMAN: Yes.

6 MR O'CONNOR: Mr Knuckey, as we've already heard from
7 Mr Evans, was the managing director of RISC Management
8 Limited.

9 THE CHAIRMAN: Yes.

10 MR O'CONNOR: As I think I have said, it's been decided that
11 he is not going to be called to give oral evidence at
12 the inquiry, and we've discussed that with other core
13 participants.

14 THE CHAIRMAN: Yes.

15 MR O'CONNOR: Mr Knuckey provided two substantive statements
16 to the Metropolitan Police Service during the course of
17 their enquiries. The first was dated 12 December 2006.
18 The second was dated 6 November 2013. What I propose to
19 do now is to read sections from each of those two
20 statements and in addition to invite you to adduce into
21 evidence two documents that were written by Mr Knuckey.

22 THE CHAIRMAN: Yes.

23 MR O'CONNOR: Sir, the sections that I'm going to read this
24 morning from Mr Knuckey's statements relate first to
25 a report that Mr Knuckey prepared in 2004, relating to

1 an apparent extortion attempt against Boris Berezovsky
2 and subsequently the attack, the fire bombing, on
3 Mr Litvinenko's house, and secondly to Mr Knuckey's
4 general impression of Mr Litvinenko.

5 I'm not going to read at this stage any of the
6 detail of Mr Knuckey's statement regarding the work
7 conducted by Mr Litvinenko for RISC during 2006. Our
8 view is that those matters are best left to be dealt
9 with in oral evidence by Mr Quirke who is going to give
10 evidence next week, and once he has given evidence, we
11 will review whether we need to read any further extracts
12 from Mr Knuckey's statements.

13 THE CHAIRMAN: Yes, I see.

14 MR O'CONNOR: Sir, the first statement I'll read from is the
15 statement dated 12 December 2006.

16 THE CHAIRMAN: Yes.

17 MR O'CONNOR: Sir, for your reference I'm going to start
18 reading on the second page of that statement, although
19 I don't ask for it to be brought up on the screens.

20 THE CHAIRMAN: Thank you.

21 MR O'CONNOR: "I have been asked to detail any involvement
22 I have had with Alexander Litvinenko.

23 "I first met Alexander Litvinenko during the summer
24 of 2004. I believe he was known by the CEO Keith Hunter
25 before then. It is probable that Keith Hunter

1 introduced me to Litvinenko but I do not remember. At
2 that time I knew he was an associate of
3 Boris Berezovsky, a high net worth individual, who
4 in September 2003 was granted political asylum and
5 allowed to remain in the United Kingdom.

6 "Berezovsky was and is wanted by the Russian
7 authorities allegedly in connection with a fraud
8 associated with a company called LogoVAZ in the
9 Samara region of Russia.

10 "I knew Litvinenko was an ex KGB operative, latterly
11 FSB, and I spent some time with Litvinenko during 2004.

12 "During that time he told me about some of his work
13 whilst attached to the KGB. That at one time he had met
14 Vladimir Putin, who had become the head of the FSB, when
15 there was a change in the senior command structure of
16 the KGB.

17 "Litvinenko thought it was then appropriate to adopt
18 the role of a whistle blower and alert Putin as head of
19 the FSB to some of the corrupt practices of his senior
20 officers. Ultimately, Litvinenko's strategy had
21 resulted in him being suspended. Whilst he was
22 suspended he told me he was out on the street one day
23 with his wife and they had been shot at by an unknown
24 gunman.

25 "Thereafter he made a conscious decision to leave

1 Russia because he believed that his and his family's
2 lives were at risk.

3 "He had made his way to the West, I believe by
4 entering Turkey, then eventually made his way to the
5 United Kingdom.

6 "The reason that I met him was that during 2004, two
7 Chechnyan nationals, who were later identified as
8 Vakha Dusheyev and Russlan Aboukhanov, also known as
9 Russlan Baysarov, also known as Zakhar, had been
10 attempting to extort money from Boris Berezovsky. This
11 was because one of them, Zakharov, was alleging that he
12 had been instructed by Berezovsky to go [to] Paris and
13 hand over either a floppy disk or a CD ROM that
14 allegedly contained the plans for a 'nuclear suitcase
15 bomb'. Zakhar's contention was that Berezovsky should
16 have paid him for doing this and had not done so.

17 "All previous attempts by Zakhar and Dusheyev to
18 negotiate with Boris Berezovsky had not produced
19 a response.

20 "It would have been difficult for Zakhar and
21 Dusheyev to get through direct to Berezovsky.
22 Berezovsky has personal assistants and aides. They
23 would have taken the calls, filtered them and probably
24 fobbed the pair of them off.

25 "To the best of my recollection Dusheyev actually

1 knew Litvinenko. They had rung Litvinenko on the
2 morning of 25 May 2004, and asked for an urgent meeting
3 with him. Litvinenko agreed and Dusheyev arrived at his
4 apartment or his house in Muswell Hill with Zakhar in
5 tow. They were invited in. I remember that Litvinenko
6 offered them both breakfast but they declined and they
7 moved out into the garden of the house where Zakhar did
8 all the talking.

9 "Zakhar explained the problems or difficulties he
10 was experiencing in being paid by Berezovsky for
11 undertaking this errand to Paris, and they wanted
12 Litvinenko to speak to Berezovsky to mediate some
13 financial settlement.

14 "The negotiations thereafter became fairly complex
15 and it is well documented in a bundle of notes, into
16 which is incorporated a summarised report which I handed
17 to DC Mark Stebbing on Monday, 4 December 2006.
18 I identify this as my exhibit CK/1.

19 "They were also aware that Akhmed Zakayev, who was
20 a Chechnyan national, was currently resident in London
21 at that time.

22 "As I recall Zakayev had applied for political
23 asylum because the Russians were intent upon extraditing
24 him for terrorist offences related to various events in
25 Chechnya.

1 "I seem to recall that Dusheyev had been a previous
2 bodyguard of Zakayev and there was at least one occasion
3 when Litvinenko was waiting outside an English language
4 school in Oxford Street, waiting for Zakayev to emerge,
5 who was in the process of trying to master the English
6 language, and Litvinenko was approached by Zakhar and
7 Dusheyev and asked who he was waiting for.

8 "Litvinenko explained that he was waiting for
9 Zakayev to come out of the school, and when Zakayev did
10 emerge, Zakhar and Dusheyev, for the want of a better
11 adjective, doorstepped Zakayev on the steps of the
12 English language school.

13 "Litvinenko's interpretation of the conversation was
14 that Zakhar was threatening Zakayev, which he explained
15 to me was not appropriate, bearing in mind that Zakayev
16 had held quite a pivotal role in the Chechnyan
17 government.

18 "Both Zakhar and Dusheyev were aware that Zakayev
19 knew Berezovsky because in 1999, Berezovsky had been
20 a member of the Russian Duma and had been tasked by the
21 Russian administration of Boris Yeltsin to attempt to
22 negotiate a settlement to the Chechnyan dispute at the
23 time. I think that Berezovsky actually negotiated
24 a ceasefire.

25 "Litvinenko's interpretation was that they were

1 trying to use Zakayev to create some leverage with
2 Berezovsky to get him to pay up.

3 "Throughout the summer of 2004, Litvinenko contacted
4 me and said that Dusheyev and Zakhar were persistently
5 contacting him asking him for updates and had he spoken
6 to Boris Berezovsky. As I recall, throughout the whole
7 of August 2004, Berezovsky was in Israel. The end
8 result during 2004 was that Zakhar and Dusheyev did not
9 get anywhere with their demands. Berezovsky, I think
10 quite rightly and appropriately, would not service them,
11 and things seemed to go quiet for a while.

12 "Then, in 2005, both Zakayev and Litvinenko, who
13 both have home addresses up in Muswell Hill, had their
14 houses fire bombed. The report about this I have given
15 to police in exhibit CK1, details the investigation into
16 the blackmailing and the arson."

17 Pausing there, it seems very likely that that date
18 is a mistake and that the 2005 should have read 2004.

19 THE CHAIRMAN: Yes.

20 MR O'CONNOR: We'll see when we look at his report that in
21 fact he details this event as being in 2004 in the
22 report.

23 THE CHAIRMAN: Yes, thank you.

24 MR O'CONNOR: Continuing:

25 "It was generally thought that Zakhar and Dusheyev

1 had been responsible. An allegation of arson was made
2 to the CID at Tottenham.

3 "I had a couple of conversations with a detective
4 constable and endeavoured to give him the background,
5 ie the threats to Zakayev, Litvinenko and
6 Boris Berezovsky. From enquiries that we made, it would
7 appear that both Dusheyev and Zakhar absconded to Paris
8 where Zakhar had been previously resident and had been
9 granted political asylum in France.

10 "I cannot remember where I got the intelligence
11 about this, but it may have well been from Litvinenko
12 himself. Although that was the information that was
13 given to me, I never managed to substantiate it.

14 "I know that a copy of the report, exhibit CK1, was
15 handed over to the police to a detective constable Matt
16 Coombes of Special Branch, but not by me personally.
17 This was with a view to a copy of it being handed over
18 to the security service.

19 "I have since recently become aware, I think since
20 publicity surrounding Litvinenko's illness, that I have
21 read in the press that the two fire bombing suspects
22 were arrested in the UK and were released without
23 charge."

24 Sir, pausing there, you have heard reference being
25 made in that extract of Mr Knuckey's statement several

1 times to a report that he prepared which was exhibited
2 to this statement. In fact the report is in the form of
3 two documents, a main report and also a timeline.

4 I wonder if I can call those up.

5 THE CHAIRMAN: Yes.

6 MR O'CONNOR: The first document starts INQ019304.

7 Sir, you will see this is a report headed
8 "Information". The report goes through to page --
9 perhaps we can just call up the last page, INQ019310.

10 Sir, it looks like the gremlins haven't completely
11 departed, but for present purposes I don't think it
12 matters, because all I was intending to do was to invite
13 you, sir, to adduce this document into evidence, so that
14 it can be put up on the website and adduced as evidence
15 in the Inquiry.

16 THE CHAIRMAN: Yes, I see, yes.

17 MR O'CONNOR: The second document, I don't know if we might
18 get that on the screen, which is INQ019301. That is the
19 second of the two documents, you'll see it's entitled
20 "Events Timeline". I don't know -- I will try to push
21 my luck one stage further -- whether it's possible to go
22 to the third page of that document, so INQ019303.

23 No, it isn't.

24 Sir, when it is available to all, it will be -- I'll
25 simply say this: that is the page that contains the

1 date -- ah yes, it is possible. You will see, sir, the
2 middle reference there, this is Mr Knuckey's timeline,
3 and you'll see the reference on 14 October 2004 to the
4 attack on Mr Litvinenko's house, and you'll recall
5 I mentioned as I was reading his statement that his
6 reference to 2005 was probably a mistake.

7 THE CHAIRMAN: Yes.

8 MR O'CONNOR: As I say, sir, I'm not going to read all of
9 those documents through, simply invite you to adduce
10 them into evidence in the Inquiry.

11 THE CHAIRMAN: Yes, thank you.

12 MR O'CONNOR: The primary significance of these events,
13 which obviously took place in 2004, is that they appear
14 to provide the immediate explanation for the attack on
15 Mr Litvinenko's house in October 2004.

16 Sir, there are a few further passages of
17 Mr Knuckey's first statement and also his second
18 statement I will read now, if I may.

19 Returning to his first statement, in fact on the
20 same page that I had reached.

21 THE CHAIRMAN: Yes.

22 MR O'CONNOR: "During 2004 I had several conversations with
23 Alexander Litvinenko, but I do not recall the details.

24 "I personally have never paid him any money,
25 certainly not during that period, and certainly not

1 since. Garym Evans paid Litvinenko GBP 1,000 in 2005 in
2 cash. Litvinenko had written a book which he presented
3 me a signed copy of, about the Russian FSB who he stated
4 had blown up an apartment block in Moscow and laid the
5 blame for it at Chechnyan separatists.

6 "I have to say that I am a very objective person,
7 having worked closely with informants during my
8 30 years' previous service with the Metropolitan Police.

9 "I have worked more closely with informants than
10 most police officers. I found Litvinenko a bit
11 tiresome. I found him to be less than objective.
12 Everything was a conspiracy based on his interpretation,
13 which itself was based on his past experiences with the
14 KGB and FSB.

15 "Normally I could only rely upon 20 per cent of what
16 he told me. I know that a lot of the views he espoused
17 were based on rumour, innuendo and interpretation.

18 "During 2005 our company decided to use him as
19 a source, and as a result of that I deputed
20 a Garym Evans. He used to work for our company up
21 until February 2006. Evans managed Litvinenko as
22 a source. Occasionally I would see Litvinenko in the
23 office. I have to say that under Garym Evans'
24 stewardship, Litvinenko was not in the office that much.

25 "I recall that when that relationship started,

1 I think we paid him GBP 1,000 in cash. I did not pay
2 that across personally, Garym Evans would have done
3 that.

4 "When Garym Evans left in February 2006 for
5 alternative employment, I passed the management of
6 Litvinenko to Dan Quirke.

7 "Quirke has experience of managing sources by virtue
8 of his previous service with Her Majesty's
9 Customs & Excise. In 2006 I only met Litvinenko once,
10 which I think was around April 2006."

11 Moving on several pages to page 8 of the statement:

12 "In relation to Andrei Lugovoy, I have only met him
13 once. That was earlier this year in April 2006. He had
14 come to us to give us some intelligence.

15 "Lugovoy was Litvinenko's associate based in Moscow.
16 Litvinenko told us that he could get various things
17 done, intelligence gathering and such like in Moscow.
18 It would have been something that we had a need for.
19 From time to time, we get companies ask us for
20 intelligence related to Russians. Whilst you can get
21 some intelligence from publicly available databases, it
22 is always handy knowing people in Moscow that can
23 provide you with intelligence that is not contained
24 within publicly available databases."

25 Again, moving over the page, sir:

1 "Present at that meeting in April 2006 were
2 Litvinenko, Lugovoy, a female interpreter they provided,
3 Dan Quirke and myself. As I recall, Litvinenko did
4 a lot of the talking. He explained what they could and
5 could not provide. He suggested they could provide
6 anything we wanted. He explained Lugovoy was his
7 contact in Russia. Lugovoy did not say very much.
8 I felt he did not need an interpreter as his English was
9 good enough without her. When we started getting down
10 to the nitty-gritty of fees and stuff like that Lugovoy
11 could speak reasonably good English."

12 Sir, as I say, we will hear from Mr Quirke about the
13 details of that meeting.

14 THE CHAIRMAN: Yes.

15 MR O'CONNOR: Finally in this statement on page 11, one
16 sentence:

17 "I do not have any personal knowledge of persons
18 named Dmitri Kovtun, Scaramella, Sokolenko."

19 Sir, finally a few passages from the second of
20 Mr Knuckey's two substantive statements, this one dated
21 6 November 2013, so seven years after the event, and
22 starting on page 2, five or six lines down:

23 "The first issue deals with my knowledge and
24 dealings with Alexander Litvinenko who I met through our
25 then CEO Keith Hunter in, I believe, the summer of 2004.

1 I found Alexander Litvinenko to be an elaborate
2 individual who was not credible and had limited sources
3 of valuable information. He was an individual who was
4 persona non grata with the Russian Federation, his
5 country, and his ex FSB contacts and to this end he did
6 not really offer very much."

7 Sir, dropping down a few lines, he returns to
8 discussing the meeting in April 2006 in these terms:

9 "The meeting took place at the boardroom of RISC.
10 A female interpreter was present for the benefit of
11 Lugovoy, but I knew he could speak and understand
12 English perfectly. This was the only time I ever met
13 Andrei Lugovoy. Apart from Dan Quirke, Lugovoy,
14 Litvinenko and the interpreter, there was also another
15 male present who I formed the opinion was in the company
16 of Lugovoy. This unknown male sat next to Lugovoy and
17 played no active part in the meeting. This male was
18 aged mid-to-late 30s, dark hair, medium build and was
19 similarly casually dressed as was Lugovoy on this day.
20 I had not seen this other male before the meeting and
21 I have not seen him since."

22 Sir, you will observe that this account is somewhat
23 different to the account Mr Knuckey gave in his earlier
24 statement.

25 THE CHAIRMAN: Yes.

1 MR O'CONNOR: Sir, finally, for present purposes, on page 5
2 of Mr Knuckey's statement, reading from the second line.

3 THE CHAIRMAN: Yes.

4 MR O'CONNOR: "Andrei Lugovoy -- my brief relationship with
5 Andrei Lugovoy came about as a direct result of
6 a tasking I gave to Alexander Litvinenko during the
7 first quarter of 2006. I have had no other dealings
8 with this individual. I have been asked whether I know
9 or have ever met Dmitri Kovtun. Whilst I appreciate the
10 relevance of his name in relation to media reporting of
11 Litvinenko's death, to my knowledge I have never met him
12 and could not say whether he was present at the meeting
13 I have referred to above in April 2006."

14 THE CHAIRMAN: Yes.

15 MR O'CONNOR: Sir, as I said that is what we propose to read
16 of Mr Knuckey's statement at present. It may be after
17 hearing from Mr Quirke, that it will be necessary to
18 read further sections of his statement.

19 THE CHAIRMAN: Thank you. Yes.

20 MR O'CONNOR: Sir, may we now call Mr Holmes.

21 THE CHAIRMAN: Yes.

22 MR JOHN HOLMES (sworn)

23 Questions by MR O'CONNOR

24 MR O'CONNOR: Could you give your full name, please?

25 A. John Taylor Holmes.

1 Q. Mr Holmes, thank you for coming. As you know, the
2 purpose of this Inquiry is to investigate the
3 circumstances of Alexander Litvinenko's death. I think
4 it's right to say that he did some work for two
5 companies that you were involved with running in the
6 period of 2005 and 2006.

7 A. Correct.

8 Q. I know that you gave a witness statement to police in
9 2006, and I think you've had a chance to look back at
10 that again this morning. If you want to refer to it
11 while you're giving evidence, do feel free to do so.

12 A. Thank you.

13 Q. May I start with some brief questions about your own
14 background. I believe that you were formerly in the
15 army, you joined the army in 1970 and you retired in
16 2003, having had a distinguished career as a major
17 general?

18 A. Slightly wrong. I was commissioned in 1970 and I think
19 I retired, if I remember, in 2002.

20 Q. Well, thank you for those details. By 2005, so a few
21 years after you had left the army, you were involved in
22 running a number of companies, I think, from offices in
23 25 Grosvenor Street, Mayfair?

24 A. Correct.

25 Q. One of those companies was a company called Erinys UK.

1 Is that right?

2 A. That's correct.

3 Q. Erinys UK was a related company to a larger company
4 called Erinys International?

5 A. Yes, Erinys International was, I think, registered in
6 Dubai. Erinys UK was obviously its UK subsidiary.

7 Q. Can you tell us just a little bit about those two
8 companies and your role with them?

9 A. I was a director of both companies, Erinys International
10 and Erinys UK. Erinys International had started life as
11 a private security company in South Africa, and when the
12 Iraq war occurred, it got on the ground very quickly in
13 Baghdad and secured a major contract to protect Iraq's
14 oilfields, and it did that by creating an oil protection
15 force which put it really into the energy space going
16 forward. The force developed, it was a very large
17 force. Unfortunately we had to hand it over early
18 because sovereignty was handed back to the Iraqis early,
19 but at that point we had decided as a board that going
20 forward, we would try to capitalise on that experience
21 and seek security clients in the energy sector, in the
22 oil and gas sector primarily.

23 Q. That was a decision taken by Erinys International?

24 A. Correct.

25 Q. Of which you were a director?

1 A. Yes.

2 Q. As you say, Erinys UK being its UK subsidiary, you were
3 attempting during this period to try to diversify and
4 find other markets?

5 A. That's correct.

6 Q. Was one of these other markets the Russian energy
7 sector?

8 A. Yes, it was, because at the time the Russian energy
9 sector was starting to expand out of Russia and into
10 places like Africa, et cetera, and we thought we had
11 something to offer.

12 Q. In summary, you've talked about providing security to
13 the Iraqi oilfields. Erinys' business was in providing
14 physical security, is that right?

15 A. Correct.

16 Q. So men on the ground protecting installations and so on?

17 A. Yes, and other risk management services, such as threat
18 assessments, related services to doing a physical
19 security piece.

20 Q. I see. In Grosvenor Street in London, there was you and
21 also a man called Tim Reilly?

22 A. Correct.

23 Q. What was his role in Erinys, either Erinys International
24 or Erinys UK?

25 A. We employed him as a consultant. He had experience in

1 the private security sector and he was also a fluent
2 Russian linguist, and we brought him on board in order
3 to try to cultivate the relationship with the Russian
4 oil and gas companies.

5 Q. At the time we are focusing on, so 2005/2006, were you
6 and Mr Reilly essentially the sole presence for
7 Erinys International/Erinys UK in London?

8 A. Correct.

9 Q. You weren't offering any of these services in the UK?

10 A. No.

11 Q. You were marketing essentially the services to be
12 offered overseas, is that right?

13 A. Correct, yes.

14 Q. Moving then to one side, that was the Erinys operation,
15 there were other companies that you were running or
16 involved in running from the same premises called Titon,
17 is that right?

18 A. Correct.

19 Q. One of those was a company called Titon Computer
20 Securities and Forensics. Can you tell us a little bit
21 about that company?

22 A. That was a subsidiary of Titon International. I think
23 it had been set up the year beforehand by
24 Mr Dan Humphries, and we were trying to get into the
25 cybersecurity space.

1 Q. We'll come on to Mr Litvinenko in a moment, but I think
2 it's right to say that he in fact had no involvement
3 with that particular part of your business at all?

4 A. None whatsoever. Certainly that I'm aware of.

5 Q. That's probably the last we need to talk about that
6 particular Titon company, but there was another Titon
7 company which you've just mentioned,
8 Titon International?

9 A. Correct.

10 Q. What was the business of that company?

11 A. It was an investigative due diligence business, set up
12 by Mr Attew and myself, and invested in by Erinys, they
13 provided the capital to set up, and that's the reason we
14 were co-located, because I was a director of both
15 companies.

16 Q. Titon International, despite its name, was a company
17 based in the UK, is that right?

18 A. Registered and based in the UK, yes.

19 Q. So unlike Erinys, it wasn't a company that offered
20 services all over the world?

21 A. No, correct.

22 Q. And --

23 A. We had overseas clients, obviously, but we didn't market
24 overseas, if you follow me.

25 Q. There was no presence in anywhere other than London?

1 A. No, no.

2 Q. You've mentioned Mr Attew as the person who set it up
3 with you.

4 A. Yes.

5 Q. You were both directors of --

6 A. Directors and partners, yes.

7 Q. Was it him that carried out the day-to-day business of
8 that company?

9 A. Correct.

10 Q. You've mentioned the offices at 25 Grosvenor Street in
11 Mayfair. Who worked there during the period in
12 question?

13 A. Obviously Mr Attew, myself, Mr Reilly, Mr Humphries. If
14 I remember rightly, we had a secretary at that stage.
15 That's all I can recall.

16 Q. So it would be right for us to think of a fairly small
17 concern, then?

18 A. Oh yes.

19 Q. You, sort of as it were, at the point?

20 A. Yes.

21 Q. With involvement in all of these different companies,
22 and then Mr Reilly working with you on Erinys?

23 A. Yes.

24 Q. Mr Attew on Titon International and Mr Humphries on the
25 computer cyber side of things?

1 A. Correct.

2 Q. Can we call up, I wonder, one of the graphics.

3 INQ017922. Then can we go on to page 924, please.

4 Mr Holmes, I hope that these pictures and this plan

5 is familiar to you. If you look at the pictures on the

6 left-hand side --

7 A. Ah, there we are.

8 Q. -- is that one of the rooms in your suite of offices in

9 Grosvenor Street?

10 A. That is the boardroom, yes.

11 Q. Then either using these pictures or simply by describing

12 it, help us with what the layout was of the other

13 offices. Did each of the individuals you've mentioned

14 have offices here?

15 A. If you look at the middle photograph, there we go, as we

16 look at the photograph, my office was directly off to

17 the left. The secretaries and Mr Reilly's office was

18 off to the right, and then offset to one side was

19 a large open plan office where Mr Attew and the others

20 sat.

21 Q. You say "the others". Who do you mean by that?

22 A. Mr Humphries.

23 Q. The boardroom was a room used by all of you for

24 meetings, was it?

25 A. Correct.

1 Q. Thank you. I think we can take that off the screen now.
2 I'll ask you first, if I may, a few questions about
3 Mr Attew and Titon International and Mr Litvinenko's
4 relationship with them.

5 I think it's right to say that Mr Litvinenko started
6 working with Titon through Dean Attew, is that correct?

7 A. Correct.

8 Q. You first became aware of Mr Litvinenko because Mr Attew
9 introduced him to you?

10 A. Yes.

11 Q. Can you remember how he introduced you or what his
12 intended role was in the company?

13 A. He -- from what I recall, he was introduced to me
14 obviously as an ex-Russian citizen who was now working
15 in the UK who had good, strong links to the Russian
16 intelligence services and could help us with due
17 diligence tasks in Russia.

18 Q. Can you remember when it was that you first either met
19 Mr Litvinenko or became aware that he was working with
20 Mr Attew?

21 A. I can't, no.

22 Q. I think you say in your statement that it was in early
23 2006. Would that be about right?

24 A. That would be about right, yes.

25 Q. If Mr Attew was to tell us it was a little bit earlier

1 than that, you wouldn't quarrel with him?

2 A. No, I travelled a lot, so I wasn't in the office the
3 whole time, and that could well be the case.

4 Q. That may lead to the next thing I wanted to ask you,
5 which is that I think we're likely to hear evidence from
6 Mr Attew that during 2006, he met Mr Litvinenko very
7 often, once a week, sometimes even more often than that.
8 Did you meet him that often, or were you not always in
9 the office where they met?

10 A. No, I think I actually met him, in terms of talking to
11 him and drinking coffee with him, et cetera, probably
12 three to four times. I saw him around the office quite
13 a lot.

14 Q. I see. Those three to four times when you met him, were
15 they all in the office, do you think?

16 A. From what I recall, yes.

17 Q. You don't recall, for example, going on any trips with
18 him or going out for any social events or anything of
19 that nature?

20 A. No.

21 Q. How well would you say you came to know him?

22 A. Not well personally. Through work, I mean reasonably
23 so, in that Mr Attew said his service was a good one.

24 Q. Did you speak Russian?

25 A. I don't speak Russian, no.

1 Q. So you spoke with Mr Litvinenko in English?

2 A. Yes.

3 Q. Did you discuss business with him and Mr Attew, or was
4 it Mr Attew that dealt with business with Mr Litvinenko?

5 A. It was Mr Attew.

6 Q. So your discussions were --

7 A. My only discussions with him were when Mr Reilly was
8 having difficulty -- we appeared to have hit a glass
9 ceiling in Gazprom in getting access, and at that stage
10 we asked Mr Litvinenko if he could help with our
11 initiative in Russia.

12 Q. So that was Mr Reilly and Erinys --

13 A. Yes.

14 Q. -- which I'll come back to in a moment, but as far as
15 Mr Attew was concerned, you didn't discuss the details
16 of whatever Mr Attew was dealing with with
17 Mr Litvinenko?

18 A. No.

19 Q. Do I assume then that you never met Mr Litvinenko alone?

20 A. I can't say, I really can't remember.

21 Q. You don't have any particular memory of a business
22 meeting with him face-to-face?

23 A. No, but I must have done, I guess. I mean ...

24 Q. I'm just wondering whether the times you are referring
25 to, he was in the company of Mr Attew or Mr Reilly, or

1 perhaps these are simple details that you can't remember
2 at this distance in time?

3 A. Sorry, I can't, no.

4 Q. It may follow from what you've said that you can't help
5 us very much more than you already have done, but can
6 you give us a little bit more of an indication of the
7 type of work that you understood Mr Litvinenko to be
8 carrying out for Mr Attew?

9 A. As I understood it, he was doing due diligence reports
10 on individuals in Russia for clients.

11 Q. That may be terms that you're familiar with. Can you
12 help us a little bit -- with a bit more detail on what
13 you mean by due diligence reports in your particular
14 sector?

15 A. Principally, when a client comes, he's thinking of
16 investing in Russia, he's perhaps got a local partner,
17 and he wants the partner checked out, is he what he says
18 he is, et cetera, et cetera. So it's a deeper version,
19 if you like, of the straightforward due diligence that
20 most companies do on a day-to-day basis.

21 Q. So perhaps the client may not have gained all the
22 reassurance he needed from doing ordinary Companies
23 House checks or open source checks?

24 A. Nothing is open in Russia. Sorry, I'm not being
25 flippant, but it's not an open book in Russia. So you

1 have to dig quite deeply, or you certainly had to then,
2 to find out about whether these people were reliable or
3 not.

4 Q. That process demanded a sort of specialist level of
5 knowledge which people like you or Mr Attew wouldn't
6 have had, but Mr Litvinenko may well have done?

7 A. Correct, it demanded Russian knowledge. That sort of
8 information is not available on the web.

9 Q. Would your understanding then have been that Mr Attew
10 would have tasked Mr Litvinenko to investigate or to
11 find out information about certain named individuals or
12 companies?

13 A. Correct.

14 Q. Are you aware whether Mr Litvinenko would have had to
15 travel to do any of this work?

16 A. Not that I'm aware of. I wouldn't have thought so.

17 Q. Leaving Mr Litvinenko to one side for the moment, just
18 generally in terms of using what we might describe as
19 "sources" to prepare reports of this nature, would
20 a company like yours have given consideration to whether
21 the source was being placed in danger by carrying out
22 the task that he was asked to do?

23 A. No, in that, as I say, I don't believe he travelled on
24 any of our business; he was resident in the UK, I was
25 aware that he had various connections to government, and

1 there was no real reason to think about that; and
2 I would have expected Mr Litvinenko to have told us if
3 he thought that any of the tasks that we gave him were
4 putting him into danger, and I don't believe he ever
5 did, but Mr Attew might have a different opinion,
6 I don't know.

7 Q. We can certainly take that up with Mr Attew, but I think
8 in answering that question, you focused on, as it were,
9 immediate physical danger, taking steps or going to
10 places to find out information. What about a risk that
11 might have been posed had it become known that someone,
12 a source, like Mr Litvinenko, had investigated an
13 individual, perhaps provided negative information about
14 a powerful individual? Was that a risk that you
15 appreciated at the time or considered?

16 A. I don't think it's a risk that we would have considered.
17 I would expect, as I said, if it was to be considered,
18 he would be the person to do it, because Russia is
19 a very opaque place, or was then, and certainly he was
20 never forced to do anything, and if I recall rightly he
21 was doing work for others as well. So I assumed he knew
22 what -- if there was a risk, he knew about it and was
23 mitigating it in some fashion.

24 Q. Thank you. I was going to ask you about that. We have
25 heard, and will hear, more evidence that Mr Litvinenko

1 was performing similar work for other security
2 companies. Did that strike you as odd? Would it be
3 unusual for someone to offer similar services to
4 different companies, or not?

5 A. No, it's usual for sources to work for a raft of
6 companies.

7 Q. Did you have any involvement in making payments to
8 Mr Litvinenko for the work that he did with Dean Attew?

9 A. No involvement other than board involvement.

10 Q. What would that have been? Approving payments?

11 A. No, not in terms of approval, but being aware, seeing
12 the books and being aware of the jobs that were being
13 done, what they cost and what our margin was.

14 Q. You probably don't have any detailed memory of this now,
15 but would you have expected Mr Litvinenko to have been
16 paid for the type of work you know he was doing?

17 A. Yes.

18 Q. Do you in fact have any memory about whether he was paid
19 or how much he was paid?

20 A. I'm aware of some invoices on my right here.

21 Q. Well, can you tell us how much he was paid?

22 A. Hang on. Well, this -- I assume that these are to
23 him -- there has been a redaction up here, so that's one
24 job at GBP 3,300, one job at GBP 5,000, and one job at
25 GBP 11,000.

1 Q. Would you expect that -- do those sums seem typical for
2 the type of work that you know Mr Litvinenko was doing?
3 A. Yes.
4 Q. You've touched on this point already, but although you
5 didn't know the detail of the work that Mr Litvinenko
6 was doing for Mr Attew, did you get an idea of whether
7 Mr Attew valued Mr Litvinenko's work?
8 A. Yes, Mr Attew actually told me he was very pleased with
9 the work.
10 Q. We may hear evidence from Mr Attew that the two of
11 them -- that is Mr Attew and Mr Litvinenko -- were
12 discussing quite separately from the due diligence work
13 a deal involving the bulk purchase of copper. Is that
14 something you know anything about at all?
15 A. I don't recall anything about that, I'm sorry.
16 Q. Thank you. Moving on, if I may, then -- we've touched
17 on this -- to the other part of your business, Erinys
18 and the physical security business that it provided,
19 that was the work that Mr Reilly carried out in London,
20 yes?
21 A. Correct, yes.
22 Q. We know, or we're likely to hear evidence that
23 Mr Litvinenko was introduced to Mr Reilly.
24 A. Yes.
25 Q. Do you know how that introduction took place or did they

1 simply bump into each other in the offices?

2 A. Mr Reilly became aware of Mr Litvinenko because he was
3 in the office so much, and, as they both spoke Russian,
4 obviously there was a synergy there.

5 Q. I was going to say, Mr Reilly, unlike you and Mr Attew,
6 was a fluent Russian speaker?

7 A. Yes.

8 Q. I think we're likely to hear from him that he used to
9 speak to Mr Litvinenko in Russian.

10 A. Yes.

11 Q. Do you remember when this meeting took place or --

12 A. No, I don't.

13 Q. But during the time that Mr Litvinenko was working with
14 Mr Attew?

15 A. Yes.

16 Q. Can you tell us what it was that Mr Reilly was hoping
17 Mr Litvinenko would help him with in the business sense?

18 A. At the time we were trying to access a company called
19 Gazprom, and Mr Reilly had done really rather well in
20 getting in there and working out how they were organised
21 and which departments we were talking to, but then he
22 was having difficulty actually accessing those
23 departments, and we thought that Mr Litvinenko could
24 perhaps help us access them.

25 Q. Presumably the hope was that you might get a contract

1 from Gazprom to provide physical security to make up for
2 the work that you were no longer carrying out in Iraq;
3 that was the context of all of this, wasn't it?

4 A. Correct, yes.

5 Q. Do you know what it was that Mr Litvinenko did to help
6 Mr Reilly?

7 A. To be honest, no. I assume he made phone calls,
8 et cetera, but I'm afraid you'll have to get that from
9 Mr Reilly. I really can't remember.

10 Q. Do you know whether Mr Litvinenko was paid for the work
11 that he did with Mr Reilly, as opposed to the work he
12 did with Mr Attew?

13 A. If I recall correctly, no, because we hadn't got to that
14 point.

15 Q. I think we are likely to hear from Mr Reilly that he
16 wasn't paid, but your understanding, if that was the
17 position, would be not that Mr Reilly was simply trying
18 to get something for nothing, or would it be that there
19 was a business relationship being built up there?

20 A. A business relationship being built up and by this time,
21 Mr Litvinenko knew and trusted us.

22 Q. We're likely to hear that Mr Litvinenko introduced his
23 contact, Mr Lugovoy, to Mr Reilly to assist with the
24 work relating to Gazprom. Were you aware of this at the
25 time?

1 A. From what I can recall, after we'd talked to
2 Mr Litvinenko about how he could help us, at some point
3 thereafter we were introduced to Mr Lugovoy and
4 Mr Kovtun, and if I recall, the context was that they
5 might be able to help us.

6 Q. Anything unusual in that sort of -- one introduction
7 moving on to another introduction?

8 A. No, I didn't think anything odd of it at the time.
9 I didn't -- from what I -- again, from what I recall,
10 the nature of the meeting was such that they met in the
11 boardroom and before that somebody, I think, wandered
12 into my office and said "hello". Whether that was
13 Mr Lugovoy or Mr Kovtun, I have no idea.

14 Q. Just pausing there for a moment, we will hear evidence
15 that there was a meeting on 16 October 2006 between
16 those men, Mr Litvinenko, Mr Lugovoy and Mr Kovtun and
17 Mr Reilly. First of all, were you at that meeting?

18 A. I was in the office all day on the 16th.

19 Q. You were in the office.

20 A. Yes.

21 Q. Did you attend the meeting?

22 A. No, I did not.

23 Q. Can you recall whether there was a reason for that or
24 was that simply something you would have expected --

25 A. I just left -- because it was -- I assumed they talked

1 in Russian and I left it to them.

2 Q. Do you think you would have been aware of the meeting
3 happening at the time, generally speaking, what its
4 purpose was?

5 A. Oh, most certainly.

6 Q. You've just mentioned, perhaps in answer to a question
7 I might have asked, whether you actually met Mr Lugovoy
8 and Mr Kovtun.

9 A. I met one of them, I think.

10 Q. Simply because one of them happened to wander into your
11 room and introduce himself?

12 A. Yes.

13 Q. But nothing further than that?

14 A. No.

15 Q. No discussions?

16 A. No.

17 Q. And to the extent you're not even sure which one of the
18 two it was that you met?

19 A. Correct.

20 Q. That was a meeting on 16 October 2006 as we've said.

21 A. Yes.

22 Q. Was there anything that happened at your offices in the
23 period before that which, looking back on it, you think
24 may have been significant?

25 A. Yes, about five or six weeks beforehand -- and this was

1 reported to the police at the time -- our offices -- or
2 25 Grosvenor Street was broken into over the weekend.
3 The front door which was a heavy oak door, was brutally
4 forced open. The intruder then went straight up to our
5 offices without touching anything else and kicked in our
6 rather flimsier door up there, and our alarm went off
7 and clearly at that point he left, but it was a very odd
8 occurrence because of (a) the force used and (b), well,
9 what was this all about? And I remember that Mr Attew
10 and I spent a lot of time trying to work out what it
11 was, what had happened, and at the time we gave no -- we
12 had no thoughts that it was in any way linked to
13 Mr Litvinenko, but with hindsight now, I suspect it
14 probably was.

15 Q. Just a little more detail. You mentioned the heavy oak
16 door that was beaten down.

17 A. Yes.

18 Q. That was the door on to the street, was it?

19 A. Yes.

20 Q. Behind that door, do I understand that there were
21 offices of a number of companies, not just yours?

22 A. Correct, we were on the fourth floor and there were
23 companies on the other floors.

24 Q. Roughly speaking?

25 A. Three companies, I think.

1 Q. Three other companies?

2 A. Yes.

3 Q. And what you've described, is that heavy door on to the
4 street being broken down?

5 A. Yes.

6 Q. Then clearly, whoever went in, going straight up to your
7 door, breaking that down?

8 A. Yes.

9 Q. But then being deterred by the fact that the burglar
10 alarm went off, and as far as you could see, not
11 damaging or interfering with your offices themselves?

12 A. Correct, either deterred or his aim was purely to send
13 a message.

14 Q. But as you said, that was something you reported to the
15 police at the time?

16 A. It was reported to the police at the time. In fact I'm
17 not sure that we reported it, but I know that the
18 downstairs porter, concierge, rather, did.

19 Q. Sticking with the premises for a moment, we've already
20 heard, and we will hear plenty more evidence about this,
21 after Mr Litvinenko's death it was found that your
22 offices had been contaminated with polonium. Can you
23 tell us something about that and the effect it had on
24 your business?

25 A. It was a substantial contamination and we had to leave

1 the offices and the offices had to be cleaned minutely
2 and we had to work elsewhere for four months before we
3 got back in.

4 Q. Were you yourself tested for any radiation poisoning?

5 A. Yes.

6 Q. What was the result?

7 A. I had a dose, and Mr Reilly had a larger dose.

8 Q. Were you unwell at any time during this period?

9 A. No.

10 Q. I think the last question I have for you, Mr Holmes, is
11 that we may hear from Mr Reilly that he was discussing
12 a separate possible business venture with Mr Litvinenko
13 involving ethanol, shipping ethanol from the Ukraine to
14 the United States. Is that something you had any
15 knowledge of at the time?

16 A. I don't recall anything about that at all.

17 MR O'CONNOR: Thank you very much. Thank you very much,
18 Mr Holmes. Those are my questions, sir.

19 MR EMMERSON: No questions.

20 THE CHAIRMAN: Can I take it, Mr Holmes, that any
21 information about Mr Litvinenko's other activities
22 outside your firm came from him?

23 A. I became aware of his other activities subsequent to his
24 death, although at the time I'm sure I would have made
25 the assumption because sources do work for lots of

1 people, that, you know, he was working for others.

2 THE CHAIRMAN: Yes, thank you.

3 Yes, thank you very much indeed.

4 MR O'CONNOR: Sir, I'm afraid at this early stage, that is
5 all the evidence we have for today.

6 THE CHAIRMAN: Yes. 10.00 tomorrow morning. Thank you.

7 (11.43 am)

8 (The Inquiry adjourned until 10.00 am on Tuesday,

9 10 February 2015)

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