

**COMMISSIONS OF INQUIRY ACT**

**RETIREMENT OF THE FORMER COMMISSIONER OF POLICE**

**ISSUE OF COMMISSION**

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SWORN WITNESS STATEMENT  
OF EDGAR LAVARELLO

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I, **EDGAR LAVARELLO** of **Personal Data** Chartered  
Accountant, Director of PricewaterhouseCoopers Limited, member of the Gibraltar Police  
Authority **MAKE OATH AND SAY AS FOLLOWS: -**

1. I make this statement in my capacity as a member of the Gibraltar Police Authority (the "GPA"). The contents of this statement are true to the best of my information, knowledge and belief and the facts stated herein are known to me personally unless otherwise stated. Where the facts stated are not known to me personally, I have stated the source of my information. I have also relied on a review of documents in my possession or control as more specifically stated at paragraphs 2 and 6 hereof.
2. I have reviewed those documents referred to herein in the course of preparing this witness statement but do not produce them as I have been advised by the Solicitors to the GPA, TSN, that these have already been produced by Mr John Gonçalves ("Mr Gonçalves") and Dr Joey Britto ("Dr Britto") and that the Inquiry wishes to avoid the duplication of documents bundles. These documents are extracted from the GPA files

and are held currently by TSN for ease of use. I have been shown the documents exhibited by Mr Gonçalves at Appendix A of his Witness Statement dated 31<sup>st</sup> August 2022 ("J.G's Appendix A"), Dr Britto at Appendix B of his Witness Statement dated 13<sup>th</sup> May 2022 ("J.B's Appendix B") and Mr Vikram Nagrani's Appendix "VN A" ("V.N's Appendix A"). Cross references are to the documents in J.G's Appendix A, J.B's Appendix B and V.N's Appendix A respectively, as referred to by me.

3. The GPA was established in accordance with section 3(1) of the Police Act 2006. Section 4(1)(a) of the Police Act 2006 provides that its members shall be appointed by the Governor acting on the advice of the Public Service Commission. Pursuant to section 4(2), every member of the GPA, shall hold office for a term of three years and at the expiration of any such period or periods shall be eligible for reappointment. I was appointed with effect from 1<sup>st</sup> November 2016 for the term of 3 years, upon expiry of that term I was reappointed for a further term of 3 years and have recently been reappointed for a further term of three years with effect from 1<sup>st</sup> November 2022. I continue to be a serving member of the GPA.
  
4. I have been advised by TSN that pursuant to Legal Notice LN.2022/034 (the "Legal Notice"), the Governor of Gibraltar, Vice Admiral Sir David Steel KBE, DL, on behalf of the Government of Gibraltar, at the request of the Chief Minister, has formally issued a notice of a commission appointing Sir Charles Peter Lawford Openshaw, DL, (formerly, a judge of the High Court of England and Wales, Queen's Bench Division), as Commissioner (the "Commissioner") to inquire, as he shall in his absolute discretion consider appropriate, into the reasons and circumstances leading to Mr Ian McGrail ceasing to be Commissioner of Police ("Mr McGrail") in June 2020 by taking

early retirement (the "Terms of Reference"). I have been further advised by TSN of my duty to assist the Commissioner as may be required.

5. I am aware that pursuant to the provisions of the Commissions of Inquiry Act 1888 (references to sections immediately below being to the foregoing act), that if summoned to appear in person before the Inquiry I must answer questions put to me by the Commissioner and produce all books, papers and writings required by the summons with the following provisos:

- 5.1. no statement by me in answer to any question put to me in the Inquiry shall be admissible in evidence in any proceedings whether civil or criminal except in cases of indictment for perjury committed in such answers (section 8(2)); *and*

- 5.2. such evidence which I may give in the Inquiry shall not directly and/or indirectly render me liable to any civil proceedings or criminal prosecution although subject to the qualification that I shall not be excused from answering any question put to me in the Inquiry on the ground of any privilege, or in accordance with the privilege against self-incrimination. (Section 10).

6. Since the publication of the Legal Notice, I, and other former members and current members of the GPA have been asked by Solicitors to the Inquiry, Attias & Levy (the "Solicitors to the Inquiry"), by letter dated 23rd September 2022 (the "23<sup>rd</sup> September 2022 Letter"), to provide a statement under oath addressing the subject matter of the Inquiry which fall within the Terms of Reference and various specific matters which are listed at numbered paragraphs 1 to 3 of that letter. Additionally, Solicitors to the

Inquiry, by that letter, have requested that I produce 'any documents (including but not limited to electronic documents such as emails, word documents, PDFs and SMS, Whatsapp or other instant messages) in [my] possession or control relevant to the subject-matter of the Inquiry'. It is also noted that any electronic documents are to be provided in their native format with the original metadata preserved. After reviewing the GPA records at the TSN office, J.G's Appendix A, J.B's Appendix B and V.N's Appendix A. I have identified and referred to those documents which fall within the scope of the request but for the reasons stated at paragraph 2 hereof I do not produce them, I am of course willing to do so if requested by the Commissioner. I have kept some electronic records relating to any activities as a member of the GPA and exhibit at Appendix "EL A" copies of those documents which are material to the Inquiry. I also produce Whatsapp messages with Dr Britto which may be material to the Inquiry. These are document no. 1 of Appendix "EL A". I would state that I have conducted a thorough search and not found any material document other than those referred to herein.

7. I can only depose to those matters which I have direct knowledge of during my continuing tenure as member of the GPA.
8. At the time of making this statement I do not know what other deponents may have said about the matters about which I have been asked in the 23<sup>rd</sup> September 2022 Letter as TSN have not shown me the statements of any other deponent pending clearance to do so.

MY KNOWLEDGE OF THE REASONS AND CIRCUMSTANCES LEADING TO IAN  
MCGRAIL CEASING TO BE COMMISSIONER OF POLICE IN JUNE 2020

9. I address this question below under the heading of "The Section 34 Process".

THE AIRPORT INCIDENT

10. I would say that my recollection of the GPA's consideration of this matter was vague and I needed to refresh my memory by reading the various documents in order to make this witness statement. Having refreshed my memory I am now clear as to the events in question and their sequence. I set this out at paragraphs 11 to 22 hereof. What I have had a clear recollection throughout is the conclusion reached by the GPA that the RGP had acted correctly in this matter and that it was the MOD which had exceeded its powers. The conclusion was as set out in Mr Gonçalves' letter to the Chief Minister dated 5<sup>th</sup> September 2017 reproduced in the email to the Chief Minister dated 6<sup>th</sup> December 2017. This is document 12 of J.G's Appendix. That conclusion has been clear in my mind throughout.
11. On 11<sup>th</sup> May 2017, under "Any Other Business" Mr Gonçalves informed the GPA of a meeting which he had held with the Chief Minister on 9<sup>th</sup> May 2017. The GPA agreed to ask the Commissioner of Police (then Mr Edward Yome) whether the investigation into the alleged offences by the RAF serviceman had been concluded and, if so, request the file on the investigation. The Commissioner of Police would also be informed that the GPA intended to interview the police officers who were directly

involved in the incident. I was not present at that meeting but saw the minutes shortly afterwards.

12. A copy of the minutes of the meeting of the GPA held on 11<sup>th</sup> May 2017, referred to in the preceding paragraph hereof is listed as document no. 2 of J.G's Appendix A.

13. On 15<sup>th</sup> May 2017, a meeting was held to further consider the Chief Minister's request to Mr Gonçalves. It was agreed that as the GPA had no authority to involve the Ministry of Defence ("MOD") it should proceed under the provisions of Section 19 of the Police Act in order to submit a report to him. During the course of the meeting Mr Nick Pyle reported on a conversation which he had held with the Governor Lt Gen Edward Davis CB CBE KStJ, who envisaged that the GPA would recommend that an independent inquiry be held. I was not present at that meeting but saw the minutes shortly afterwards.

14. A copy of the minutes of the meeting of the GPA held on 15<sup>th</sup> May 2017, referred to in the preceding paragraph is listed as document no. 3 of J.G's Appendix A.

15. On 16<sup>th</sup> May 2017, Mr Gonçalves wrote to the Chief Minister informing him of the decision by the GPA on how it proposed to proceed in this matter. A draft letter was circulated for approval to all members of the GPA. A copy of that letter is listed as document no. 4 of J.G's Appendix A.

16. By letter dated 8<sup>th</sup> August 2017, the Commissioner for Police indicated that he would have a package ready which would show how the incident unfolded, the decisions

taken on the day and the actions thereafter. A copy of that letter is document no. 5 of J.G's Appendix A.

17. On 17<sup>th</sup> August 2017, the Commissioner of Police wrote to Mr Gonçalves attaching the documents referred to in the preceding paragraph. A copy of that letter is document no. 6 of J.G's Appendix A. The three documents were:

- (i) A report submitted by Superintendent McGrail. This is document no. 7 of J.G's Appendix A.
- (ii) Joint legal opinion by Lord Pannick KC and Emily Neill of Blackstone Chambers, Temple, London dated 28<sup>th</sup> February 2017. A summary of the opinion is set out in paragraph 35 thereof. This is document no. 8 of J.G's Appendix A.
- (iii) Letter from Rear Admiral A.D. Radakin, Chief of Staff, Joint Services Command, Northwood Headquarters dated 8<sup>th</sup> March 2017. The letter is self-explanatory and is document no. 9 of J.G's Appendix A.

18. The GPA had a preliminary meeting to discuss the documents referred to in the preceding paragraph hereof. These documents had previously been circulated to all the members of the GPA. It was decided that it wanted to discuss the matter further with the Commissioner of Police, Superintendents McGrail and Ullger and Chief Inspector Tunbridge. Regretfully, I cannot recall the date of that meeting or whether minutes were kept.

19. On 23<sup>rd</sup> August 2017, Mr Gonçalves wrote to the Commissioner of Police communicating the request of the GPA and fixing an appointment on 31<sup>st</sup> August 2017, at the GPA's office. I saw that letter after it was sent. A copy of that letter is document no. 10 of J.G's Appendix A.

20. The GPA prepared a list of matters which it proposed to put at the meeting referred to in the preceding paragraph. A copy of this list is document no.11 of J.G's Appendix A.

21. The GPA duly met on 31<sup>st</sup> August 2017, with the RGP officers referred to at paragraph 17 hereof. I was present at that meeting. Minutes of that meeting do not appear to have been made but if they were, they cannot be found. The GPA came to the firm conclusion that the action of and the restraint shown by the relevant RGP officers, during the airport incident were considered, deliberated, entirely proportional and highly commendable. As such the GPA did not doubt the effectiveness and probity of the policing demonstrated by the RGP in respect of the airport incident. The GPA also considered that the actions of certain MOD personnel in respect of this incident deserved censure and that the Chief Minister should consider whether a full inquiry ought to be undertaken by a body independent of the RGP and the MOD so that lessons might be learnt from the incident.

22. On 5<sup>th</sup> September 2017, Mr Gonçalves wrote to the Chief Minister communicating the conclusions of the GPA. A draft of that letter had previously been sent to all members of the GPA for our approval. It reflected the decision reached by the GPA. An amendment proposed by Stephen Reyes was not approved by the majority. I cannot



recall what that proposal was. A copy of emails between GPA members relating to this are document no 9 of V.N's Appendix A.

THE RGP'S INVESTIGATION INTO AN ASSAULT ON HELICOPTER PILOT AND CREW MEMBER IN MARCH 2017

23. I have no knowledge whatsoever of this matter. The first I learnt of it was when I read about it in the 23<sup>rd</sup> September 2022 Letter. This matter was never raised at any meeting of the GPA.

MR MCGRAIL'S APPOINTMENT AS COMMISSIONER OF POLICE

24. The process for appointing the new Commissioner of Police was agreed by all nine members of the GPA (the "Selection Process"). The GPA members at the time throughout the selection process, apart from me, were Mr Gonçalves, Mrs Hassan Weisfogel, Rev Patron and Messrs, Danino, Gomez, Falero, Nagrani and Pyle. I was informed that the Selection Process was similar to that adopted at the time of the appointment of Mr McGrail's predecessor, Mr Edward Yome. All members of the GPA were present when the two candidates made their powerpoint presentations on 27<sup>th</sup> November 2017 and during their interviews on 30<sup>th</sup> November 2017.
25. An invitation for applications for the appointment as Commissioner of Police was issued by the GPA to the Commissioner of Police. A copy of this is listed as document no. 14 of J.G's Appendix A.

26. A timetable for the Selection Process was prepared by the GPA. A copy of this timetable is listed at document no. 15 of J.G's Appendix A.
27. A document setting out the criteria against which candidates for the post of Commissioner of Police would be considered was drawn up (the "Criteria"). A copy of the Criteria is listed as document no.16 of J.G's Appendix A.
28. By letter from the GPA to the Commissioner of Police dated 6<sup>th</sup> November 2017, Mr Gonçalves made certain requests in relation to the Selection Process. A copy of this letter is listed as document no.17 of J.G's Appendix A.
29. By separate letter dated 15<sup>th</sup> November 2017, the Commissioner of Police forwarded to the GPA bundles in respect of each applicant containing confidential written assessments on each candidate and senior command course reports. Copies of each letter and bundle are respectively documents listed as nos 18 & 19 of J.G's Appendix A.
30. Each applicant submitted an application docket, Superintendent McGrail's was dated 1<sup>st</sup> November 2017 and Superintendent Ullger's was dated 3<sup>rd</sup> November 2017. Copies of the application dockets are listed respectively as documents nos 20 & 21 of J.G's Appendix A.
31. On 21<sup>st</sup> November 2017, Mr Gonçalves wrote to the Commissioner of Police replying to a number of points raised in his letter to him of 15<sup>th</sup> November 2017. A copy of that letter is listed as document no.22 of J.G's Appendix A.

32. On Monday 27<sup>th</sup> November 2017, all the GPA members heard each candidate deliver powerpoint presentations setting out their respective visions for the force within the next 5 years and the priorities that they would set. Following this they answered questions from the members of the GPA.

33. On Thursday 30<sup>th</sup> November 2017 the candidates were interviewed in depth by a panel, consisting of Mr Gonçalves, Mr Gomez, Rev Patron and Mr Pyle. We, the other members of the GPA, were present throughout. The candidates were probed, in particular, on issues of neighbourhood policing, Gibraltar Defence Police, the viability of working with the unsuccessful candidate, community engagement, preparation of case dockets, cybercrime, resources, partnerships, counter terrorism, management style, and major public events.

34. On Tuesday 5<sup>th</sup> December 2017 the GPA met to consider what advice should be given to HE the Governor. It deliberated at length on the different strengths of the candidates, taking into account all the information at its disposal, the performance of the candidates in delivering their written and oral presentations and their interviews. It felt that both candidates were suitable but by a majority of 7-2 considered that Supt McGrail was the stronger of the two. I thought that Mr McGrail had given a better interview and presentation than Mr Ullger. I also thought that Mr McGrail was better suited as Commissioner to deal with the existing issues within the RGP. I considered Mr Ullger to be an excellent candidate and that his time would come. The two dissenting members were Mr Nick Pyle and Mr Danino. At one point in the selection process, I cannot recall exactly when, Mr Pyle suggested that the post of

Commissioner should be open to officers in the United Kingdom and Overseas Territories. At some point Mr Pyle said he would not support either candidate which could only mean that he wanted the new Commissioner to be appointed from outside the RGP. The suggestion that the vacancy should be open to police officers of outside forces was considered by the other members, but in the end the suggestion was dismissed as it was considered that it was unnecessary given that two perfectly suitable candidates had applied.

35. Mr Gonçalves communicated the decision of the GPA to HE Governor who having consulted the Chief Minister endorsed the appointment of Mr McGrail as Commissioner.

#### FORMAL COMPLAINTS FOLLOWING MR MCGRAIL'S APPOINTMENT

36. I have not received or heard any complaints in respect of the efficiency, effectiveness, probity, integrity or independence of Mr McGrail in the undertaking of his duties as Commissioner of Police.

#### THE SECTION 34 PROCESS

37. On the 21<sup>st</sup> May 2020, an emergency meeting (the "Emergency Meeting") of the GPA was held to consider the matters raised by the Chief Minister and the Interim Governor at a meeting which they had held with Dr Britto on 18<sup>th</sup> May 2020. Five members of the GPA attended. Section 6(1) of the Act, requires a quorum of six members and only five were in attendance. I was one of those members who was not in attendance. Dr

Britto contacted me by WhatsApp on 21<sup>st</sup> May 2020 but because I had finished work late I did not see his message until late on 21<sup>st</sup> May 2020 (see document no.1, page 1 of Appendix EL A). We agreed to speak the following day and I met Dr Britto by accident outside **Personal Data** (where we both reside) in the early morning of 22<sup>nd</sup> May 2020 on my way to my office. He informed me that he had convened an Emergency Meeting and of the decision taken at that meeting. I do not recall the details of the conversation but the gist of it was that Dr Britto said that only 5 members had been personally present and that the non-attendees were being consulted. He informed me that he had been called to a meeting on 18<sup>th</sup> May 2020 with Mr Pyle, in his capacity as Interim Governor, and the Chief Minister. At that meeting he had been told that they had both lost confidence in Mr McGrail because of his failure to adequately implement the police inspectorate's report and to inform him where the incident at sea had occurred outside British Territorial Waters. This incident had resulted in the death of two Spanish Nationals. Mr Britto said that Mr Pyle and the Chief Minister had asked him to initiate the Section 34 Process under the Police Act 2006 with a view to inviting Mr McGrail to retire. Mr Britto said that an informal record of that meeting had been prepared which had been produced at the GPA meeting the previous day. He said that those present at the Emergency Meeting had agreed that Mr McGrail should be invited to retire mainly because of the incident at sea and because given the loss of confidence by the Interim Governor and the Chief Minister his position had become untenable. I said that I agreed with that decision for the same reasons. I did not attach much importance to the issue of the implementation of the Police Inspectorate's report. I was more concerned by the loss of life resulting from an incident involving an RGP vessel outside British Territorial Waters and its potential international repercussions. I did not see how Mr McGrail could remain in post if he had lost the

confidence of both the Interim Governor and the Chief Minister. Nonetheless I thought that the GPA's decision was not final and effective until Mr McGrail was afforded the opportunity to make representations and these were considered by the GPA.

38. The deliberations and agreed course of conduct of the GPA are evidenced by the minutes of the Emergency Meeting which have been produced at document no 4 of J.B's Appendix B. These reflect my position

39. I am informed by Dr Britto and verily believe to be true that he invited Mr McGrail to meet him in person. They agreed to meet at Mr McGrail's office at New Mole House Police Station on 22<sup>nd</sup> May 2020. They met and during the meeting, Dr Britto handed Mr McGrail a letter (the "First Letter") inviting him to retire. A copy of the First Letter is document no. 5 of J.B's Appendix B. Mr McGrail challenged the contents of the First Letter and requested him to substantiate the reasons for the invitation to retire. In response to the request made by Mr McGrail, the GPA set out the reasons for its invitation to retire in a further letter dated 22<sup>nd</sup> May 2020 (the "Second Letter"). A copy of the Second Letter is document no. 6 of J.B's Appendix B. It appears that this letter was sent to Mr McGrail by Dr Britto by email of even date. A copy of that email is document no. 7 of J.B's Appendix B.

40. I did not have contemporaneous knowledge of the events referred to in the preceding paragraph or sight of the two letters. I was informed of them and sent electronic copies after the event but before receipt of the letter from Charles Gomez & Co dated 29<sup>th</sup> May 2020 referred to in the following paragraph. I nonetheless endorse their contents.

41. On the morning of 29th May 2020 all GPA members received an email from the Dr Britto titled "OFFICIAL – Factual Report" which was Private and Confidential and Legally Privileged (for GPA members eyes only) which contained the report on the Maritime Incident sent by Mr McGrail to the Chief Minister (the "Factual Report"). A copy of the email is document no. 2 of Appendix EL A. The report was provided to allow the GPA to properly contextualise any representations that could be received by Mr McGrail by Tuesday 2nd June (the expiration of the 7 working days). I am advised by TSN that there is no need for I to produce the Factual Report as this is material that is already before the Inquiry.

42. On 29<sup>th</sup> May 2020 (the "29<sup>th</sup> May 2020 Letter") the GPA received a letter addressed to it by Charles Gomez & Co acting as Solicitors for Mr McGrail. Dr Britto circulated a copy of the 29<sup>th</sup> May 2020 Letter to all GPA members by email. A copy of this email is document no. 3 of Appendix "EL A". The 29<sup>th</sup> May 2020 Letter was sent to Dr Britto under cover of an email of even date from Nicholas Gomez of Charles Gomez & Co, of which he acknowledged receipt. A copy of the 29<sup>th</sup> May 2020 Letter is document no. 8 of J.B's Appendix B. A copy of the email accompanying the 29<sup>th</sup> May 2020 Letter is document no. 9 of J.B's Appendix B. Dr Britto, by email, that same evening called for a meeting of the GPA for Monday 1st June 2020 at 09:30am. A copy of that email is document no. 4 of Appendix "EL A".

43. Operation Delhi was not mentioned by Dr Britto during our conversation and that operation did not influence my thinking in any way whatsoever. The reasons for my decision to support the proposal to initiate the Section 34 Process and invite Mr McGrail to retire are those stated at paragraph 37 hereof.

44. Following receipt of the 29<sup>th</sup> May 2020 Letter, the GPA convened a meeting on 1<sup>st</sup> June 2020. Minutes of that meeting were prepared by Ms Nadine Collado and circulated by email to the members of the GPA for comment. A copy of that email is document no. 5 of Appendix "EL A". A copy of the minutes of that meeting is document no. 10 of J.B's Appendix B. Members unanimously agreed that independent legal advice should be sought. The GPA instructed TSN and Mr James Neish K.C of TSN to act as Counsel
45. Following his consideration of the 29<sup>th</sup> May 2020 Letter and the contents of the First and Second Letter, Mr James Neish K.C. advised the GPA that its application of section 34 of the Act had been innocently yet fundamentally flawed because the GPA had wrongfully invited Mr McGrail to retire, without following the process set out in section 34(2) of the Act. The invitation to retire could only have been made after affording Mr McGrail reasonable opportunity to make representations and giving due consideration to those representations.
46. The GPA was advised to withdraw its invitation to Mr McGrail to retire and to abandon the process.
47. A delegation of members of the GPA namely, Mr Frank Carreras, Ernest Gomez and Dr Britto, attended a meeting at TSN's offices to discuss the advice given to it by Mr James Neish K.C and to consider what action should be taken as a result of that advice. It was agreed that TSN should write to Charles Gomez & Co informing them that the GPA was withdrawing its invitation to Mr McGrail to retire and that the process was being abandoned. It was also agreed that the GPA should write to the Chief



Minister and the Interim Governor to inform them of the GPA's decision. I was consulted after the proposed course of action and agreed that we should follow it.

48. TSN on behalf of the GPA wrote to Charles Gomez & Co in these terms by letter dated 5<sup>th</sup> June 2020. A copy of that letter is document no. 15 of J.B's Appendix B.

49. Neither I, nor, to my knowledge, any other member of GPA had any further involvement or contemporaneous knowledge in this matter before the retirement of Mr McGrail.

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ALLEGATIONS OR COMPLAINTS OF BULLYING/INTIMIDATION DURING MR MCGRAIL'S TENURE AS COMMISSIONER OF POLICE

50. I am not aware of any allegations or complaints made in respect of bullying and/or intimidation by Mr McGrail.

MEETINGS

51. Save as stated at subparagraphs (viii), (xv), and (xix) below I have not attended any meeting arising with or in connection with any of the matters raised in the 23<sup>rd</sup> September 2022 Letter or touching the subject of the Inquiry with any of the persons listed at numbered paragraph 2 of the 23<sup>rd</sup> September 2022 Letter namely:

- (i) The Hon Fabian Picardo KC MP, the Chief Minister
- (ii) Mr Albert Mena, Financial Secretary

- (iii) The Hon Neil Costa, former Minister for Justice
- (iv) Dr Joseph Garcia, Deputy Chief Minister
- (v) Mr Darren Grech, Chief Secretary
- (vi) Mr Michael Llamas KC, Attorney General
- (vii) Mr Christian Rocca KC, Director of Public Prosecutions
- (viii) Mr Nicholas Pyle, Deputy Governor, other than in his capacity as member of the GPA
- (ix) Lt. General Ed Davis, former Governor of Gibraltar
- (x) The Magistrates' Court (either the Clerk or Deputy Clerk to the Magistrates' Court, the Stipendiary Magistrate or the Justices of the Peace)
- (xi) Mr Lloyd DeVincenzi, Solicitor General
- (xii) Dr Joseph Britto, incumbent Chairman of the Gibraltar Police Authority
- (xiii) Mr Edward Yome, former Commissioner of Police
- (xiv) Deputy Commissioner Richard Mifsud
- (xv) Mr Richard Ullger, incumbent Commissioner of Police save as referred to in paragraphs 21, 32 and 33 hereof.
- (xvi) Mr Maurice Morello, Chairman of the Gibraltar Police Federation, or any other member of the Gibraltar Police Federation
- (xvii) Mr Paul Richardson, former Superintendent
- (xviii) Superintendent Mark Wyan (formerly Detective Inspector)
- (xix) Mr Ian McGrail save as referred to in paragraphs 21, 32 and 33 hereof.

SWORN by the above-named Deponent

**Personal Data**

at

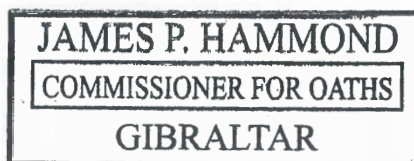
Suite 7, Hadfield House, Library St, GX11 1AA

Gibraltar this <sup>20<sup>th</sup></sup> day of October 2022

Before me

**Personal Data**

Commissioner for Oaths



This Sworn witness statement is filed by TSN on behalf of the Deponent