

INQUIRY INTO THE RETIREMENT OF THE FORMER COMMISSIONER OF POLICE

CLOSING SUBMISSIONS

1. **Retired Superintendent Paul Richardson** hopes that he has been able to assist Sir Peter Openshaw and his team to understand what happened, when, and why, in the criminal investigation known as Operation Delhi. He was the Senior Investigating Officer in that investigation, responsible both for his own decisions and actions and for those of his team.
2. The Inquiry has been strict in avoiding being drawn into the strength or detail of the case against any of the alleged Delhi conspirators, but Mr Richardson's day books and Mr Wyan's exhibits and Mr Clarke's warrant application, together with their collective memory of the journey taken by the investigative team, may allow firm findings to be made about
 - (a) the origin of the criminal complaint,
 - (b) the complexity of the evidence¹,
 - (c) the gravity of the matters complained about²,
 - (d) the public status of the suspects³,
 - (e) the sensitivity of the case,
 - (f) its political implications,
 - (g) the time taken to investigate what had happened and
 - (h) the care exercised in following the evidence
 - (i) without fear or favour
 - (j) to the identification of Mr Levy as a suspect
 - (k) to be interviewed under caution
 - (l) with the endorsement of the Director of Public Prosecutions
 - (m) and Crown Counsel Mr Zammit.

¹ Parts of the investigation were beyond the technical expertise of the RGP: Mr Richardson had to enlist the help of the NCA's cyber unit; and Letters of Request were dispatched in pursuit of evidence from the USA. [4/187/11]

² This was the most serious investigation that Mr Richardson had dealt with in 36 years of service: the actions under investigation posed a grave threat to the national security of Gibraltar. [4/186/12ff]

³ Mr Perez had been the Commanding Officer of the Gibraltar regiment. Mr Sanchez was a senior civil servant. Mr Levy was the Senior Partner and 32% owner of the most powerful law firm in Gibraltar.

3. Mr Richardson is grateful to Superintendent Wyan for the careful way in which he has recovered the relevant records from the investigation, allowed him to inspect his own papers, e-mails and Outlook calendar, and presented to the Inquiry every police document that might assist it to reach accurate conclusions. Mr Richardson's memory on its own could not have done justice to the work of the investigation team and its legal advisors in 2018, 2019 and 2020, but taking his evidence together with that of Mr Wyan and Mr Clarke the Chairman may feel that he has been provided with a coherent body of material sufficient to be confident of the team's expertise, industry, independence and integrity of purpose.
4. In their different voices, and in their different ways, in writing and in oral evidence those three police officers answered every question which the Inquiry asked of them. The Chairman may find that each of them
 - (a) diligently gave up many hundreds of hours to help the Inquiry,
 - (b) took great care to give accurate and considered evidence,
 - (c) had in the Inquiry process no 'case' to make,
 - (d) set out to prove nothing for himself,
 - (e) was straightforward and transparent in every answer that he gave,
 - (f) accepted that he was not a lawyer,
 - (g) was realistic, and not defensive, about things which could have been done differently,
 - (h) accepted on reflection that he would likely have been assisted by further legal advice,
 - (i) gave a cogent account of why search warrants and an interview under caution of Mr Levy was the next logical step in Operation Delhi, and
 - (j) knew that in the events that followed police attendance upon Mr Levy on 12th May 2020 and in the three meetings thereafter with the law officers, something was amiss.

5. Mr Richardson described it thus:

'during the course of those meetings I felt being put under pressure [from the A-G] to adopt a different procedure with Mr Levy than we would have done with other people'⁴;

'[13th May] was a very highly charged meeting and although I didn't know what had happened, I sensed that there was something seriously wrong with what was happening'⁵

⁴ [4/143/114-21]

⁵ [4/247/4-8]

6. Mr Wyan, slowly, choosing his words carefully⁶, said this about the 15th May:

*'It was strange... it appeared to me as if the conversation revolved around a problem, the problem being Mr Levy and the intention to interview him under caution'*⁷

*'I'm not sure how to explain his [Mr Llamas'] conduct. I perceived it to be almost facilitation, perhaps even negotiation... about how to deal with this particular problem'*⁸

*'there was nothing that he suggested that was unlawful. What it did was take us away from established procedures...'*⁹

*'...during the meetings I didn't feel pressure, but I would describe influence, and I think that's borne out by... the results of the fact that we entered knowing, being very confident in what we needed to do, and we left, ultimately proceeded with a course of action that was highly unusual.'*¹⁰

7. Mr Devincenzi described the atmosphere in the 13th May meeting as '*subdued and tense*'¹¹. Shortly after that meeting he renewed his promptings to Mr Llamas by WhatsApp aimed at girding Mr Llamas's loins against being importuned¹².

8. Mr Devincenzi is a pivotal witness: informed; involved; disinterested; disturbed by what he saw. His attempts to prompt the consciences of others tell their own story, both about him and about them. His was the earliest recognition of the 36N / Levy / Hassans problem¹³. His recognition straddled the 12th May. He saw the obvious conflict of interests created for those around him by the 36N / Levy / Hassans events which the police were investigating¹⁴, and he

⁶ The Chairman may remember the cautious and measured way in which Mr Wyan gave evidence, polite and deferential to Mr Llamas and Mr Rocca, about what it was like to be in the meeting.

⁷ [5/195/7ff]

⁸ [5/197/13ff]

⁹ [5/197/20ff]

¹⁰ [5/21119ff]

¹¹ [11/34/15]

¹² C6806

¹³ [11/20/2-10]

¹⁴ 'I thought it was possible, possible, that he might be importuned by Mr Levy, possibly by the Chief Minister. Um, given what was at stake, potentially at stake, I didn't want to cast aspersions, but I thought it was a possibility.' [11/29/15 – 11/30/4];

'I had this sort of building concern over time that notions were being planted in his head that maybe he needed to push back on' [11/53/18-21]

saw that same obvious conflict of interests play out as those around him reacted to the police attendance on Mr Levy at Hassans offices¹⁵. He has since resigned from his role as Solicitor-General and is therefore able to speak freely about what he made of all that. The Chairman may conclude that Mr Devincenzi is conspicuous for his identification of both the existence and the location of ‘red lines’ which should now be clear to all.

9. We submit that the conflict of interests apparent within the Delhi events, which together with further evidence led the police to Mr Levy as a suspect, may help the Chairman to draw conclusions about how the Hassans individuals (Levy, Picardo, Baglietto, Moshe Levy) behaved in response to police action against Mr Levy, and why.
10. And, in the reverse direction, that the responses of those Hassans individuals to the police action against Mr Levy may help the Chairman to draw conclusions about the earlier behaviour of Mr Levy and Mr Picardo (and the other suspects) concerning 36N, and whether the police and Crown Counsel and the DPP were right to identify a reasonable suspicion in the evidence which led them to seek warrants and a caution interview against Mr Levy.
11. Further, the Chairman may find that the behaviour and the thinking of the Hassans individuals both during the Delhi events and after the 12th May police action go a long way to explain the behaviour of Mr Llamas and Mr Rocca in the meetings of the 13th, 15th and 20th.
12. These submissions are not intended to be anything like comprehensive. Most of what happened has become clear during the live evidence. The process has done its work. The Chairman’s interventions have been instructive. The Inquiry’s preliminary conclusions will already be well developed. We make written submissions now on a handful of limited topics, and divide them up as the Before, the On, and the After of 12th May, just as we did in opening.

¹⁵ ‘I had a sense of disquiet about this whole file. I had from the beginning. I wasn’t certain that the AG was drawing a line around his own role...’ [11/48/24 – 11/49/2]

‘Again, generally I just wanted to make sure that Michael was alive to what might be happening around him. I didn’t know, but I thought it was – all the time I had intuited rationally that this was not an ordinary kind of case, that he had to deal with this with great delicacy, protect the integrity of his office...’ [11/51/7-15]

‘...if he needed it to gird his loins against any sort of importuning by anyone...’ [11/31/1-11]

Before 12th May 2020

Decision to apply for a search warrant.

14. These are not Judicial Review proceedings¹⁶, and the Inquiry has been at pains to point out from the start that it is not interested in the sort of submissions that might be advanced in the Supreme Court of Gibraltar or the Administrative Court in the UK. But we invite the Chairman to consider the following findings, short of that, which may be relevant to his examination of what happened and why.

- (a) This was an assessment made in good faith¹⁷
- (b) Neither Mr Richardson nor Mr Wyan would have contemplated making the application if they had been told by the Attorney-General to take no further action without his approval in the meeting which he called in Mr Rocca's absence on the 7th April 2020¹⁸
- (c) There were valid considerations which militated in favour of seeking production orders
- (d) There were valid considerations which militated in favour of seeking search warrants
- (e) There were evidence based reasons for believing that Mr Levy would comply entirely properly with a production order
- (f) There were evidence based reasons for believing that Mr Levy might conceal evidence relevant to the Delhi investigation if he were put on notice of examination of his devices.
- (g) This had happened in the case of Mr Sanchez (whose deletions included messages between himself and Mr Levy)¹⁹
- (h) An examination of Mr Levy's devices might well have confirmed or dissolved the suspicion of the RGP and the DPP that he may have become involved in a serious criminal offence
- (i) Mr Levy was a practising lawyer and Queen's Counsel of renown
- (j) The DPP advised at an early stage that Mr Levy's involvement was as a businessman, not in connection with seeking and giving legal advice²⁰

¹⁶ An application for Judicial Review would have been the correct way to challenge the search warrants. No such application was made.

¹⁷ [4/91/4]; [5/172/11ff]

¹⁸ This was the day before Mr Rocca endorsed the designation of Mr Levy as a criminal suspect having read the full summary of evidence and consulted with Mr Zammitt. Mr Llamas did not mention to Mr Rocca that he had given this instruction. Mr Llamas made no note of this instruction. Mr Devincenzi has no memory of this instruction being given [11/18/22 – 11/19/4; and 11/98/6-23]] and was not surprised later to hear of a warrant [11/39/4-14]. The notes of the meeting do not record it. In any event, having heard Mr Richardson [4/69/9-20] and Mr Wyan it may be clear that it would have been unthinkable for either of them to have ignored such a significant instruction from such a senior law officer.

¹⁹ [4/109/5 – 4/110/12]; [4/212/7-24]; [5/82/6] 'once bitten, twice shy' - see also B287 15th May and B3068 MW log

²⁰ B5498 PR day book 24/4/19 09:30; [4/104/12-14]

- (k) Mr Levy's involvement in 36N was not as a lawyer, but rather as a shareholder²¹, as a funder²², and as a party to the guarantee of income to Messrs Perez and Cornelio²³
- (l) A year had passed since the other four suspects had been arrested
- (m) Mr Levy knew of those arrests
- (n) Mr Levy knew that those arrests had not been followed by any action against himself
- (o) Mr Levy may not have known how to fully eradicate messages from his devices – inculpatory deleted information had been recovered from Mr Sanchez's device(s)
- (p) Mr Levy may not have believed that the police would dare to come after him – his reaction on the 12th, if not performative, would suggest that this was indeed the case
- (q) The efforts made after the event by those representing and otherwise advising Mr Levy to stall and prevent the examination of Mr Levy's mobile telephone – and the disappearance now of the relevant data – may cast light back on the likelihood that he would in fact have complied with a production order to seize it²⁴.
- (r) Mr Levy was closely associated with the Chief Minister, both as partners in the same law firm and as joint shareholders in 36N
- (s) Mr Levy was publicly known to be closely associated with the Chief Minister, as his friend and mentor
- (t) This association might as easily be an incentive for concealment as for preservation of relevant data in circumstances where the evidence already discovered suggested that improper use of their personal association was contemplated as part of the conspiracy under investigation
- (u) Depending on what had been found on Mr Levy's devices, the next person to whom police attention might have turned was the Chief Minister himself²⁵
- (v) None of the police team was a practising lawyer

²¹ Mr Levy owned 32% of Hassans, which owned 100% of Astelon, which owned 33% of 36N

²² Hassans had extended to 36N a loan facility of £1m, of which £476k had so far been drawn down, and it is not clear how many of his other partners Mr Levy had told about this

²³ Hassans had guaranteed a £300k annual salary to each of them for a period should their joint venture fail, and again it is not clear how many of Mr Levy's other partners had been told about this

²⁴ [4/107/25 – 4/108/2], [5/88/2]

²⁵ [5/213/2-7] Mr Wyan: 'My recollection was that Mr Richardson... had felt that he wanted to deal with the other defendants first and then Mr Levy before turning to the Chief Minister, and he was essentially the last individual that we needed to speak to.'

[5/215/5-7] 'Q: Was the Chief Minister ever a suspect in the investigation? MW: No, he wasn't.'

- (w) The decision to apply for warrants, and the drafting of the application for the warrants, would have benefitted from legal advice²⁶
- (x) After the event it was the view of the DPP that the decision to apply for search warrants rather than a production order would be defensible (in any judicial review proceedings)²⁷
- (y) At the time the decision whether to apply for a warrant or a production order in circumstances like these was considered by the OCPL and the law officers to be an operational judgement for the RGP²⁸.

15. It may be within the Chairman's remit to offer a recommendation whether the RGP and OCPL should reconsider that 'operational / legal' delineation, perhaps by reference to the way in which warrant applications are approached in the UK and the standard forms and Criminal Procedure Rules there designed to help those required to draft them.

The application before the Stipendiary Magistrate

16. Again, there are plenty of arguments on both sides which would be advanced if these were Judicial Review proceedings. The Inquiry has made it clear that it is not its role to hear them. But, again, we invite the Chairman to consider the following findings, short of that, which may be relevant to his examination of what happened and why:

- (a) Mr Wyan was isolating with COVID symptoms, so Mr Clarke stepped in to draft the application;
- (b) Mr Clarke studied Mr Richardson's NDM and Mr Wyan's Charging Advice and based his Information in support of Application on them;
- (c) Mr Clarke sought and received advice from Mr Goldwin, the RGP lead on such applications in its Financial Intelligence Unit;
- (d) The Information in support of Application had been sent to the Stipendiary Magistrate in advance;
- (e) The application took at least one and a half hours in court and included a small number of requests from the bench for clarification of some of the evidence referred to in the application²⁹;

²⁶ [4/51/14, 4/108/6] ; [5/187/14]

²⁷ [10/68/5-7]

²⁸ [10/48/21], [10/32/21ff]

²⁹ [9/34/6 – 9/38/5]

- (f) The presentation of the application for the warrants would have benefitted from legal advice³⁰;
- (g) At that time counsel did not attend to present warrant applications in Gibraltar.

On the 12th May 2020

Police actions

17. It is common ground that Mr Richardson and Mr Wyan
- gave proper thought in advance about how to avoid unnecessary embarrassment for Mr Levy, and for Hassans
 - made discrete contact with Mr Chincotta to achieve that
 - were courteous and respectful in all their dealings with Mr Levy
 - recognised that Mr Levy's devices would contain privileged material relating to Mr Levy's other business, and that an independent privilege sieve would be required³¹
 - allowed Mr Levy to choose independent counsel to perform that sieve³².
18. That sensitivity may cast light back on the spirit in which the decision had been made to apply for warrants against Mr Levy in the first place and the care which had gone into analysing the Delhi evidence and thinking about whether and why warrants were appropriate.
19. It was suggested to Mr Richardson that he told Mr Levy that the decision to proceed by way of search warrant had been advised 'at the highest level'. That suggestion is not correct. Having heard the evidence on all sides the Chairman may conclude that it is at the very least unlikely that Mr Richardson said that.
- (a) It would not have been true
 - (b) Mr Richardson is a truthful man and a truthful witness
 - (c) As is Mr Wyan³³
 - (d) Mr Richardson behaved honourably in all his dealings with Mr Levy

³⁰ [4/100/4]

³¹ [4/91/22]

³² [4/94/8]

³³ [5/190/2-14]

- (e) Mr Richardson did reassure Mr Chincotta that the RGP would not have acted on its suspicions about Mr Levy without taking advice at a high level³⁴
- (f) That reassurance may have been misinterpreted as extending to the warrant application.

20. The suggestion that accommodations allowed to Mr Levy on the 12th were the reason why the RGP found itself under pressure in the following days to abandon its plan to ask Mr Levy questions under caution and to examine the contents of his mobile telephone does not hold water. We invite the Chairman to reject that suggestion. A careful reading (and hearing) of the recordings of the meetings of the 13th, 15th and 20th will reveal exactly how pressure ('influence') was brought to bear. The behind-the-scenes telephone calls, messages and meetings in that same period will reveal the source of and the motivations behind that pressure. The two pronged undermining of the police plan to interview Mr Levy under caution and examine his telephone messaging – through Hassans in lawyerly correspondence, through the law officers in the recorded meetings – bears many hallmarks of coordination and common inspiration. It was skilfully done. The accommodations allowed to Mr Levy on the 12th, the Chairman may conclude, were and are but a smoke screen.

The actions of others

21. On 1st April 2020 Mr Richardson had asked Mr Rocca not to tell anyone else that the RGP team planned to interview Mr Levy under caution and examine his mobile telephone for non-privileged messages relevant to his involvement in the Delhi conspiracy³⁵. The reaction of Mr Llamas and Mr Picardo supports Mr Rocca's oral evidence that he certainly had not told them³⁶.
22. Mr Picardo reacted badly to the news that the police were at Hassans executing a search warrant for Mr Levy. It is common ground that:
- (a) Hassans was Mr Picardo's own firm;
 - (b) Hassans offices were Mr Picardo's own offices;
 - (c) Mr Picardo was a partner (on sabbatical) of Hassans;
 - (d) Mr Picardo's reputation was closely connected to Hassans' reputation;
 - (e) Mr Levy was Mr Picardo's senior partner;

³⁴ [4/132/13 – 4/134/11]

³⁵ B3610

³⁶ [10/33/21-23]

- (f) Mr Levy was Mr Picardo's great friend and mentor;
- (g) Mr Picardo's reputation was connected to Mr Levy's reputation;
- (h) 36N's attempts to win the NSCIS contract from Blands were well known to Mr Picardo;
- (i) as Chief Minister he had (had) a significant role to play in the allocation of that contract;
- (j) the 36N affair was a case in which Mr Picardo had himself had several conversations and dealings, including with Mr Levy;
- (k) in some of those he had had to make a deliberate decision not to engage fully, because of red lines which he had succeeded in identifying;
- (l) 36N was a company in which Mr Picardo had a (small) personal stake;
- (m) he had not seen the evidence which prompted the present RGP action; and
- (n) he had not seen the NDM, Charging Advice or Information in support of Application.

23. The Chairman will decide which of those considerations weighed most heavily with Mr Picardo when he messaged Mr McGrail "...Given my close personal relationship with JL, I won't comment further".

After 12th May 2020

Mr Picardo

24. It is not clear how long after his first response (at paragraph 23 above) Mr Picardo decided to assist the Hassans team representing Mr Levy. He says in oral evidence that he did not realise, and still does not believe, that he should have avoided doing so.
25. The Chairman will decide which of the considerations in paragraph 22 above weighed most heavily with Mr Picardo in deciding to become a pro-active member of Team Levy.
26. Mr Picardo seems to have met and messaged the suspect and his lawyers and passed directly to those lawyers whatever he was told by the law officers, including what they told him about the actions and intentions of the police team who were (i) actively investigating the suspect, (ii) intending imminently to interview the suspect under caution and (iii) waiting to examine the suspect's mobile telephone for content relevant to the 36N affair.

27. Mr Richardson had no contact with Mr Picardo in this period. He knew nothing of the meetings and messaging between Mr Picardo and the suspect and the suspect's lawyers and the suspect's son. What he saw was the barrage of litigation correspondence from Hassans. What he heard were the words of Mr Llamas and Mr Rocca in the three recorded meetings. He and Mr Wyan knew nothing of any purpose in common between the suspect, the Chief Minister and the law officers³⁷.

Mr Llamas

28. To whatever conclusions the Chairman may have drawn for himself during Mr Llamas's oral evidence may we add the following submissions.

- (a) Mr Llamas, despite Mr Devincenzi's subtle prompting, seems to have allowed himself to be coopted to a misguided cause when he should have spoken out, in the strongest terms, and immediately, against it.
- (b) Mr Llamas seems to have known about some at least of the meetings and messaging of others, and to have allowed himself to be drawn into meetings³⁸ and messaging of his own, when he should have spoken out against them.
- (c) Mr Llamas seems to have manoeuvred first Mr Rocca, then the police team³⁹, away from their original plan, and their original confidence in it, by compromises which were all one way
- (d) Mr Levy walked away, un-interviewed, with his telephone untouched.⁴⁰

29. The Chairman will decide whether the following examples on the transcripts are coincidental or illustrative.

- (a) Mr Llamas made it one of his first tasks to remove the reference to the Chief Minister in the written police notification to Mr Levy of topics about which they wanted to question him⁴¹.
- (b) When given the opportunity to tell the other persons present at the 15th May meeting how Mr Levy's lawyers had got the idea that 'you [Mr Rocca] advised us [RGP] not to obtain a

³⁷ [5/93/11]

³⁸ Mr Devincenzi: 'I didn't think he ought to be meeting with them [Lewis Baglietto and Moshe Levy]' [11/55/15]

³⁹ [5/26/14 – 5/27/8]

⁴⁰ B3445-6

⁴¹ B5392 amended to B3302. See exchange in transcript of 13/5/20 at B189.

warrant'⁴² he said instead 'That's an assumption that they're making', 'It must have come from the conversation with Ian and the Chief Minister'⁴³.

30. The Chairman may have detected that Mr Llamas had, or purported still to have, difficulty in recognising the gap between what he did and what he should have done. The Chairman will decide whether that difficulty was genuine or not. Mr Devincenzi had tried to show him the straight path time and again, but he would not take it. In mitigation he might say that he did finally acknowledge it to the Inquiry.

31. What is certain, we submit, is that the claim made on their behalf in Opening Submissions that 'nothing that amounts to interference with a police investigation was done by either the Chief Minister or the Attorney-General'⁴⁴ has not survived contact with the whole of the evidence.

The recorded meetings

32. It was suggested to Mr Richardson, on behalf of Mr Llamas, that it was the police who came up with the idea of taking a statement from Mr Levy rather than interviewing him. This false suggestion may be a good example of something that would have been hard to disprove if the meetings of the 13th, 15th and 20th March had not been recorded.

33. In fact what happened, as the Inquiry knows, is that Mr Llamas and Mr Rocca had discussed a plan in advance⁴⁵ and decided to propose to the officers that Mr Levy be treated as a witness (who would be asked to provide a witness statement) rather than as a suspect (who would be asked to respond to questions under caution). Mr Richardson would not sign up to that and explained why not, but he was prepared to consider allowing Mr Levy to volunteer a written statement (under caution) before his scheduled interview on Monday 18th May, to allow for the unlikely possibility that he might provide an account so compellingly exonerative that it would no longer be necessary to interview him. Mr Richardson accurately foresaw what would end up happening if Mr Levy were allowed to provide a simple witness statement. What he and the other officers did not know was that they were being outflanked as well as supported.

⁴² B276 transcript of 15/5/20

⁴³ B277 transcript of 15/5/20

⁴⁴ [3/192/7]

⁴⁵ [9/80/9-14] Mr Baglietto conceded it was 'perfectly plausible' that he may have suggested to Mr Llamas (before the 13th May meeting) that Mr Levy provide a voluntary statement to the police instead of being interviewed.

A spurious tidbit

34. Mr Picardo suggested in his oral evidence, to the surprise of all, that Mr Levy had in May 2020 believed that Mr Richardson had accepted a job from James Gaggero and that this was why Mr Richardson had come after Mr Levy with a warrant. It is common ground that Mr Richardson had not in fact been offered any such job, that he was entirely honest and independent in all his dealings, and that his conduct in public office throughout was entirely proper.

35. As to whether Mr Levy was indeed labouring under this fantastical suspicion back in 2020, the Chairman will have noted the following.

- (a) This assertion is the only explanation offered for what would otherwise be a text exchange between Mr Picardo and Mr Levy which may go to the heart of Mr McGrail's complaint.
- (b) Mr Levy did not mention this fantastical suspicion at the time
- (c) Mr Levy did not mention it in correspondence
- (d) Mr Levy did not mention it in his witness statements
- (e) Mr Levy did not mention it in his oral evidence
- (f) Mr Picardo's lawyers, armed with his instructions, did not ask Mr Levy about it
- (g) Mr Baglietto, acting for Mr Levy, did not mention it at the time, for instance in correspondence with Mr Llamas or Mr Rocca
- (h) Mr Baglietto did not mention it in his witness statements
- (i) Mr Baglietto did not mention it in his oral evidence
- (j) Mr Picardo's lawyers, armed with his instructions, did not ask Mr Baglietto about it
- (k) Mr Picardo did not mention it at the time, for instance to Mr Llamas or Mr Baglietto, or in correspondence with Messrs Grech or Mena or others
- (l) Mr Picardo did not mention it in his witness statements
- (m) Mr Picardo mentioned this for the first time in oral evidence

36. Mr Richardson would like to repeat his gratitude to the Police Superintendents Association for England & Wales for its support both before and during this Inquiry.

8th June 2024

Patrick Gibbs KC

Mariel Irvine