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Monday, 16 February 2015

(10.00 am)

MR DAVIES: Sir, good morning. Just to give you the plan for the day, we're going to hear in turn from Mr Hunter, Mr Quirke and then revert for events of 16 to 18 October to Mr Mascall. That should take most of the day, I believe.

THE CHAIRMAN: Yes, thank you.

MR KEITH HUNTER (sworn)

Questions by MR DAVIES

1 MR DAVIES: Would you give the Inquiry your full name,  
2 please?

3 A. Keith Lindsay Hunter.

4 Q. Mr Hunter, you have provided a single witness statement  
5 in relation to the Metropolitan Police Service  
6 investigation and that is dated 5 December 2013.

7 A. Yes, sir.

8 Q. For our reference it's INQ015801 through to 015810.  
9 Have you had an opportunity, Mr Hunter, to refresh your  
10 memory by reference to that statement this morning?

11 A. Yes, sir.

12 Q. You will appreciate I'm going to be inviting you to  
13 answer questions as to your knowledge, if any, of  
14 Alexander Litvinenko and we'll come on to that.

15 Can we just establish first some background details  
16 about you?

17 I think it's right, isn't it, Mr Hunter, that there  
18 came a point where you were the chief executive officer  
19 of a company called RISC Management?

20 A. RISC Management Limited, yes, sir.

21 Q. When did you take up that position?

22 A. In 2005.

23 Q. Prior to that, can you give us something of your  
24 professional history, please, starting perhaps with your  
25 career in the Metropolitan Police?

1 A. I joined the Metropolitan Police Service in August 199  
2 -- sorry, 1977, and retired in February 1997, so almost  
3 20 years' service, attaining the rank of detective  
4 sergeant, and my last posting was on the regional crime  
5 squad based at Scotland Yard.

6 Q. What were the nature of your duties as detective  
7 sergeant on the regional crime squad?

8 A. We were tasked to arrest serious criminals here in the  
9 UK and abroad.

10 Q. The character of the crime you were investigating in  
11 your methods, can you summarise those, please?

12 A. Serious offences. They ranged from drug trafficking,  
13 kidnap and ransom, serious robberies, those type of  
14 serious offences.

15 Q. Did some of those enquiries have an international  
16 dimension?

17 A. They did.

18 Q. Did your duties engage you in handling confidential  
19 informants and dealing with otherwise confidential  
20 sources?

21 A. That was part of our remit, yes.

22 Q. When you left the police service, your employment turned  
23 to what, Mr Hunter?

24 A. Into the private sector.

25 Q. And the character of the work in which you were engaged?

1 A. Investigation, risk management work which would  
2 incorporate intelligence, dealing with fraud enquiries,  
3 asset tracing, disputes, litigation support, IT  
4 forensics and security consultancy work.

5 Q. In what capacity did you get involved in this type of  
6 work?

7 A. Well, I was the CEO of the business, and primarily my  
8 role was to work on business development, and --

9 Q. Which business, Mr Hunter, forgive me?

10 A. Both, both on the previous business, which was  
11 ISC Global --

12 Q. Pausing there, when was ISC Global set up?

13 A. In early 2000.

14 Q. And who were the partners?

15 A. Stephen Curtis and Nigel Brown.

16 Q. Now, Stephen Curtis is a name this Inquiry has heard  
17 before. He was a solicitor, I believe.

18 A. Yes, that's correct.

19 Q. Who lost his life in a helicopter crash in 2004.

20 A. That's correct.

21 Q. We'll come on to it, but can you help as to the scale of  
22 his legal partnership prior to his death, in broad  
23 terms?

24 A. The legal partnership was relatively small, with  
25 a couple of partners that he had and some administration

1 assistance working out of their offices in Park Lane, in  
2 Mayfair. It was a small team.

3 Q. Was his legal partnership based at the same address as  
4 ISC Global UK Limited?

5 A. That's correct.

6 Q. Can you help us with something of the character of his  
7 connections and his capacity to generate work for the  
8 security partnership?

9 A. Yes, he was an extremely well thought of individual as  
10 well as a well thought of lawyer. He was extremely well  
11 connected, I don't think I've known anybody as well  
12 connected as him. From all parts of the world. And at  
13 all different levels, whether it be governments, whether  
14 it be high net worth individuals or ultra-high net worth  
15 individuals, and he was well liked and respected amongst  
16 all the people that I've certainly been introduced to.

17 Q. Across the two partnerships, was Mr Curtis simply  
18 providing legal advice or did the nature of his advice  
19 go beyond that?

20 A. No, it wasn't really on a legal basis. It was more  
21 introductions into his network of contacts and clients.

22 Q. Deconstructing that a bit, Mr Hunter, what are we really  
23 talking about here, a network of well connected clients  
24 and so on? What stamp of person are we talking about  
25 internationally?

1 A. As I say, they could be government, political people,  
2 they could be members of the royal family in the Middle  
3 East, they were major shareholders of some significant  
4 public companies worldwide. There was an array of  
5 people. He certainly wasn't in one jurisdiction solely.  
6 He was well spread.

7 Q. Was he advising them, simply charging to connect them,  
8 or what?

9 A. A bit of everything, really. He was certainly advising.  
10 Some of the companies he was a shareholder of, but as  
11 I said, he was a very well respected party and a trusted  
12 adviser.

13 Q. In your statement, you said he had strong and  
14 influential links worldwide at the highest level.

15 A. Yes.

16 Q. You go on to say that he had professional links to three  
17 of the Russian oligarchs. Do you remember that? It's  
18 bottom of the page 015805, so page 5 of your statement,  
19 second paragraph.

20 A. Yes, sir.

21 Q. So can you elaborate on that, please, the proposition  
22 that he was professionally linked to three oligarchs;  
23 first of all who were they?

24 A. The first one I mention is Boris Berezovsky who he  
25 advised for a number of years, I think, going back to

1 the late 1990s, and was a strong supporter of his.  
2 Mikhail Khodorkovsky was the other gentleman I mentioned  
3 who I'm sure we all know recently came out of prison and  
4 again, he was a strong supporter of Group Menatep, the  
5 holding company, as well as Yukos itself, one of the  
6 subsidiaries, and Vladimir Gusinsky was another one of  
7 the original oligarchs who again he supported.

8 Q. Mr Hunter, did you get involved with any work on behalf  
9 of any of these oligarchs or not?

10 A. Yes, sir.

11 Q. So far as you're aware, was Mr Litvinenko engaged in  
12 work directly on their behalf?

13 A. Certainly --

14 Q. Through your company?

15 A. Through my company?

16 Q. Yes.

17 A. Certainly I understand that Mr Khodorkovsky was  
18 somebody -- sorry, that Mr Litvinenko supported some  
19 work for Mr Khodorkovsky's businesses, but I think  
20 you'll find that Mr Litvinenko was working directly with  
21 Mr Berezovsky, so it wouldn't have come through us.

22 Q. We'll come back to some of that.

23 So let us revert to ISC Global UK Limited.

24 You've indicated that the partners were Mr Curtis  
25 who died in 2004 and Nigel Brown. What was Mr Brown's

1 background?

2 A. He was police as well, I think serving some 15, 16 years  
3 in the police before, again, coming out into the  
4 corporate world.

5 Q. Did you know him through the police prior to your joint  
6 partnership of this company?

7 A. No, no, I met him since we both retired.

8 Q. I take it Mr Brown was known to Mr Curtis in some way,  
9 was he?

10 A. Yes.

11 Q. To what extent did they have a relationship prior to you  
12 becoming involved?

13 A. They had a relationship and then when I joined the  
14 partnership, then I became involved.

15 Q. Yes. Did you know Mr Curtis or Mr Brown prior to 2000?

16 A. Yes, both of them, because between Mr Brown and I, we  
17 had our own businesses and we subcontracted between the  
18 two of us. So we built our relationship there  
19 commercially, and some of the work that we were doing  
20 jointly was for and on behalf of Mr Curtis.

21 Q. So your policing career ended in 1997.

22 A. Yes, sir.

23 Q. And ISC Global UK was set up in early 2000.

24 A. Yes, sir.

25 Q. Can we take it you had been engaged in this sort of work



1 through that broadly three-year period?

2 A. Yes, sir.

3 Q. It was that that qualified you in the eyes of others for  
4 a partnership?

5 A. Yes, sir.

6 Q. And to take it from there. What was the address of the  
7 company?

8 A. Which one, sir?

9 Q. ISC Global UK.

10 A. 94 Park Lane.

11 Q. And RISC Global, you've said, was absorbed into  
12 RISC Management at the beginning of 2006.

13 A. Yes, sir.

14 Q. And the address of RISC Management Limited?

15 A. Was 1 Cavendish Place.

16 Q. Was that now separate, Mr Curtis had died of course by  
17 then, so the leaders had changed?

18 A. Sure, there was a rebranding and a division of obviously  
19 the business. Mr Brown took up his business in Israel  
20 where he had set up, and I continued with the UK  
21 business.

22 Q. Who, then, constituted the UK business at  
23 RISC Management Limited, which personnel? Was there a  
24 Mr Knuckey?

25 A. Yes.

1 Q. Can you set out who was there and who did what on  
2 a day-to-day basis, 2005/2006?

3 A. So Mr Knuckey had a business called RISC Global which  
4 was part of RISC Management which finally got absorbed  
5 into RISC Management in 2006, but personnel-wise, we had  
6 myself, Cliff Knuckey, Daniel Quirke, Neil Casey,  
7 David Thompson, Stephen Cullis, Gabby Catlin,  
8 Steve Shepherd, Graham Wilson, Matt Daly, Roy Hatton and  
9 some admin and support staff.

10 Q. Let's just look at it as it started. You and Mr Knuckey  
11 together formed RISC Management Limited?

12 A. No, in fact Cliff Knuckey came in slightly after.

13 Q. All right.

14 A. It was -- Tony Brightwell was the MD at RISC Management  
15 when it first started.

16 Q. Right. Was there a point where Mr Knuckey became  
17 involved there?

18 A. Yes, in 2006, the year after.

19 Q. Did he replace Mr Brightwell?

20 A. Correct, yes.

21 Q. As at the point at which Mr Knuckey joined the company,  
22 your position was what?

23 A. CEO.

24 Q. And Mr Knuckey's?

25 A. MD. Managing director.

1 Q. I don't believe Garym Evans and Daniel Quirke were there  
2 concurrently. Mr Quirke took over from Mr Evans as we  
3 have understood it.

4 A. I'm not sure. There may have been a small overlap.

5 Q. What were your day-to-day responsibilities, Mr Hunter,  
6 as at the point at which Mr Knuckey had joined as MD?

7 A. Still very much the same, going out and winning business  
8 and trying to not only get new clients but make sure  
9 those clients were satisfied with the services, and  
10 looking at enhancing some of our subcontractors'  
11 confidential sources that were needed for the business.

12 Q. Were you engaged directly in individual lines of enquiry  
13 on behalf of clients, or were you --

14 A. No, we had an operations team which coped very well  
15 with, whether it was investigations, research, IT work,  
16 so my job really would be to bring the work in, and then  
17 it was allocated through Tony Brightwell to start with  
18 and then when Cliff took over, Cliff Knuckey would then  
19 be responsible for the operational work.

20 Q. Was he operations director effectively?

21 A. Yes.

22 Q. What was the scale of this company, Mr Hunter? Let's  
23 start with the number of directors and fee earners.

24 A. Directors, I believe at RISC Management we had four.  
25 Myself, Simon Hume-Kendall, who was a non-executive

1 chairman, Stephen Smith and Paul Duffen as directors.

2 Q. How many staff at Cavendish Place? I'm just trying to

3 get a sense of scale of this.

4 A. I think there were just about 20.

5 Q. Including administrative staff and so on?

6 A. Correct.

7 Q. How many would be on the operations team?

8 A. About 14, 15 of them.

9 Q. Right.

10 A. Certainly the names I've mentioned.

11 Q. So far as you're aware, Mr Hunter, is this company still

12 operating?

13 A. No, it's not.

14 Q. Do you know when it ceased to operate?

15 A. In January last year.

16 Q. In very general terms, I think you may have covered it

17 to some extent already, the type of clients you had

18 typically for this sort of security work, how would you

19 characterise them?

20 A. A mixed bag of clients, ranging from a number of law

21 firms, accountancy firms, trust companies, high net

22 worth individuals, large corporates, a real mixed bag.

23 Q. What was it your company could offer that they needed

24 that wasn't, so to speak, available to somebody from

25 open source material or such jurisdictions as have

1 publicly available information about companies and  
2 individuals, what could you add in terms of value?

3 A. I don't think there was anything particularly unique  
4 what we offered. We were one of many businesses in that  
5 risk management field that offered services which go  
6 beyond publicly available material, and that's why we  
7 have to use confidential sources and contacts to get  
8 intelligence and information when we need it.

9 Q. You've produced a list of core services in your witness  
10 statement which I won't ask you to read out, but perhaps  
11 if we could have on screen INQ015802, please. It spares  
12 you reading it out.

13 A. Okay.

14 Q. You've subdivided the business functions of RISC into  
15 core services, specialist services, client services and  
16 going on to the next page, 15803, INQ015803, just the  
17 last couple of items there.

18 If we could just go back to 15802, please.

19 Is this a fair representation, Mr Hunter, of the  
20 range of services the company was offering under the  
21 broad heading of "security investigations and services"?

22 A. Yes, sir, I think this was actually taken from our  
23 website.

24 Q. You've already said that, so to speak, there was  
25 competition in the market for these services at the

1 time. Were you aware of a company called  
2 Titon International at the time as one of your  
3 competitors?

4 A. Yes.

5 Q. What was the level of demand for this work in London?

6 A. Sorry, in what way, sir?

7 Q. You've indicated a range of clients internationally and  
8 nationally. What was the level of demand in the market  
9 for the type of services you were offering?

10 A. I think a great deal of demand. That's why there were  
11 so many businesses and there are still many businesses  
12 now.

13 Q. Was that demand increasing, decreasing, going back to  
14 2005/2006?

15 A. I think it was probably increasing then, but it  
16 increases because of the opportunities that are  
17 presented to you. So it is very much about who brings  
18 in the work, because, as I said, there's a lot of  
19 businesses out there, and it really is about your  
20 ability to win the work in the first place as it is  
21 a very competitive market.

22 Q. Right. Now, did you have clients that were seeking  
23 information within these categories as to interests in  
24 Russia and individuals in Russia?

25 A. Russia is a part of the business, yes.

1 Q. To what extent was it part of the business? An  
2 important part? Tangential?

3 A. It was an important part, not necessarily a significant  
4 part, but it was certainly an area where we had good  
5 strengths.

6 Q. In your opinion, Mr Hunter, would it have been widely  
7 known that companies such as yours existed in order to  
8 make these types of enquiry using intelligence sources,  
9 other contacts and so on, would that have been common  
10 knowledge to companies and individuals trading in  
11 Russia?

12 A. I would have said so, yes.

13 Q. Accordingly, can I just ask for your comment on this.  
14 If it became known to individuals in Russia, who were  
15 the subject of these enquiries, that a particular  
16 company had been responsible for the work in the  
17 enquiry, in your judgment would that be something that  
18 would generate a threat to people in your company or  
19 not? In other words, if you were seen as the company  
20 that had provided the information to a client --

21 A. Yes, there's always a potential for that.

22 Q. But to put it bluntly, you could be replaced, couldn't  
23 you, in performing that function?

24 A. Tens if not hundreds of companies out there, worldwide,  
25 that would be able to perform services that we regularly

1 service for clients.

2 Q. You would be one of many heads on this hydra of an  
3 industry, to put it somewhat grandly?

4 A. Absolutely.

5 Q. So to remove you from the process would not remove the  
6 inevitability of further enquiry being -- by a  
7 competitor?

8 A. There would be another one coming along.

9 Q. Just a couple of general points, Mr Hunter, before we  
10 revert to more detail on Mr Litvinenko and others. You  
11 say in your statement that:

12 "The use of confidential sources was and still is an  
13 integral part of RISC's business."

14 Of course this is when you were still engaged by  
15 RISC. And very broadly, two types of service: firstly,  
16 providing reliable information concerning the client or  
17 client matter, and secondly you provide a referral or  
18 introduction of a contact to a client. Is that right?

19 A. Yes, sir.

20 Q. Did you work directly with Mr Litvinenko in relation to  
21 either of those categories?

22 A. No, sir.

23 Q. Who within -- if such work was conducted through your  
24 company, who was directly responsible for the engagement  
25 and working with Mr Litvinenko?



1 A. The ultimate responsibility would have been between  
2 Garym Evans and Cliff Knuckey, and then if they passed  
3 it down to others, then so be it, but they would have  
4 had ultimate responsibility for that tasking.

5 Q. So Mr Knuckey in his role as operations director, and  
6 then beneath him initially Garym Evans?

7 A. Yes, sir.

8 Q. And presumably once he left and was replaced by  
9 Mr Quirke?

10 A. Yes, sir.

11 Q. In terms of confidential sources and industry practice,  
12 I just take this very shortly with you, are you able to  
13 help us with who within the company was determining  
14 whether or not a particular potential source would be  
15 engaged as a source? I'm not going to ask for names of  
16 sources, obviously, but who in your company would make  
17 the evaluation as to who was appropriate to use as  
18 a source?

19 A. Cliff Knuckey, that was his responsibility.

20 Q. What was your role, Mr Hunter?

21 A. Bringing people to the party and then for him to  
22 evaluate whether they were useful or not.

23 Q. Did he ever come back to you to ask your opinion on such  
24 matters?

25 A. Oh, we discussed things on a regular basis, of course.

1 Q. What sort of criteria did you apply in evaluating  
2 potential sources?  
3 A. Myself or Cliff?  
4 Q. Yes.  
5 A. Myself? Just to see if there was anything that they  
6 added value to which was outside of the public domain.  
7 Q. Who determined whether they were paid and if so, how  
8 much?  
9 A. Again, that was negotiation for whatever the task was,  
10 responsibility for that would normally be Cliff's.  
11 Q. The form of payment? Cash, money transfers?  
12 A. Would normally be cash.  
13 Q. Although this is a generalisation, what sort of quantum  
14 are we considering in terms of payments for important  
15 information through your company?  
16 A. It would depend --  
17 Q. Is that a piece of string question?  
18 A. It is, absolutely.  
19 Q. Well, what would be the upper limits of the quantum  
20 I have in mind?  
21 A. Maybe 10,000, tens of thousands, certainly not hundreds  
22 of thousands.  
23 Q. Tens of thousands?  
24 A. Yes.  
25 Q. Would payments in the range of tens of thousands still

1           be paid in cash?

2    A.   That's top end, that would normally be cash.

3    Q.   Cash?

4    A.   (Witness nods)

5    Q.   Why was that, Mr Hunter?

6    A.   To keep the anonymity of the individual.  You don't want

7           to create an audit trail which would obviously lead, as

8           you mentioned earlier, for that person's identity to be

9           known.

10   Q.   What record would the company keep of such cash payments

11           that were made on the justification to preserve the

12           anonymity?

13   A.   Just a source record, no detail of the individual at

14           all.  So again that would be known to Cliff Knuckey and

15           myself.

16   Q.   Who was responsible for risk assessments of those

17           providing -- in relation to those providing information

18           to you?

19   A.   Again, that would have been Cliff Knuckey to quality

20           assure the intelligence that was coming in.  Again,

21           people have different reasons for giving information;

22           whether it's for monetary reasons or it's for revenge,

23           there are many ways that people want to talk to you and

24           give you the intelligence.

25   Q.   But you have a source of information who is -- whose

1           anonymity is to be preserved but who may,  
2           hypothetically, be at some personal risk for having  
3           provided information to you in the first place, were  
4           that to be made known.

5   A.   Potentially, yes.

6   Q.   Was there a formal documented risk assessment as to the  
7           vulnerability of such persons or not?

8   A.   No.

9   Q.   Can you help with why there wasn't such a formal risk  
10          assessment for people that, after all, were being paid  
11          up to tens of thousands of pounds to provide information  
12          to you?

13  A.   Why there wasn't a --

14  Q.   Formal risk assessment by your company in relation to  
15          these individuals?

16  A.   I think a risk assessment is carried out, but not  
17          necessarily documented.  So we would be more than aware  
18          of safeguarding those individuals and ensuring that  
19          their identity is not known.

20  Q.   But nothing written down?

21  A.   No.

22  Q.   So the product of the process is an anonymous cash  
23          payment for the reasons you've given, no documented risk  
24          assessment, and what record, if any, was kept of the  
25          intelligence or other information provided by such

1 sources?

2 A. Again, that would depend on the evidence -- sorry, the  
3 intelligence given, which, again, as I said, has to be  
4 or had to be quality assured, so even though we have ten  
5 pages of material, two pages may be relevant, eight  
6 pages are dismissed because, one, we don't believe it,  
7 two, it may be uncorroborated or, three, it's just not  
8 relevant to our enquiry.

9 Q. In what form was intelligence provided to your company,  
10 and in what form was that processed and then provided on  
11 to your client?

12 A. Again, operationally, they would do it whichever way  
13 they saw fit, so it could be over a telephone  
14 conversation, it could be in a written report, it could  
15 be on a memory stick, whichever way was the most  
16 suitable and the most secure for all parties.

17 Q. In what form would a record be kept subsequently, in  
18 other words at the end of the process, by  
19 RISC Management? Would you retain documents? Would you  
20 retain computer files of what had happened? Would you  
21 retain copies of the reports you provided?

22 A. It would be very unusual to do that, but I can't say for  
23 certain what happened to whatever material, because it  
24 could be a long-standing investigation, so the material  
25 is needed on a regular basis, or, if it's finished, the

1 data is removed, deleted, whatever the process is for  
2 that particular instruction.

3 Q. Were you responsible for security of data in that sense?

4 A. No.

5 Q. Who was?

6 A. Again, Cliff Knuckey on the operational side.

7 Q. So far as you're aware, were paper records retained,  
8 hard copy paper records retained of these sorts of  
9 documents or not?

10 A. Again, it would depend on the circumstances, whether it  
11 was a one-off enquiry and the enquiry is finished, you  
12 would normally think that they would be destroyed,  
13 shredded or whatever the circumstance. If it was an  
14 ongoing enquiry, as I've just said, they may be retained  
15 or parts of it may be retained for the enquiry itself.

16 Q. But your expectation would be at the end of any enquiry,  
17 there would be shredding of all hard copies?

18 A. Absolutely.

19 Q. What was your expectation, then, of computer records on  
20 the same basis?

21 A. Similar.

22 Q. Did you have access to computer records of enquiries as  
23 they went along?

24 A. I guess I could have had access, but it wasn't part of  
25 my remit, and I left others to deal with the operational

1 side.

2 Q. It would appear, Mr Hunter, that Mr Litvinenko at least  
3 was providing commercial intelligence to more than one  
4 organisation over time, organisation and companies such  
5 as those providing services that yours did. Does that  
6 surprise you or not?

7 A. No, sir.

8 Q. Why doesn't it surprise you?

9 A. Because sources are out there to pass information to  
10 companies such as ours, if we have clients needing that  
11 intelligence, so Mr Litvinenko would be no different to  
12 many others that we deal with.

13 Q. Did you require sources to sign any kind of contract  
14 with you, such that they would only provide intelligence  
15 to your company and not to others?

16 A. No, sir.

17 Q. Would that have been enforceable, do you think?

18 A. I very much doubt it, sir.

19 Q. From your knowledge of it in 2005/2006, most  
20 particularly in relation to Russian matters, how many  
21 individuals were in London willing to provide  
22 potentially useful information to your company, in other  
23 words proactively looking to do that?

24 A. Well, there were a number of sources that -- not just in  
25 London, but internationally, that we would use for

1 Russian intelligence.

2 Q. I appreciate that, but I'm trying to get a sense of the  
3 number of individuals with a qualifying Russian  
4 background, perhaps in ex-KGB, or whatever, who were now  
5 in London, who were making themselves available to  
6 companies such as yours to provide security intelligence  
7 for payment.

8 A. There were a number. I wouldn't say it's a high number,  
9 but all I would say is it doesn't have to come from  
10 ex-KGB or FSB. You can get intelligence from the  
11 business community, from lawyers, you can get  
12 information from a number of places. So I don't want  
13 anyone to think that all we do is look for ex-law  
14 enforcement people, because we don't. There's a much  
15 wider range of possibilities for intelligence.

16 Q. I'm obviously not asking for any names, but are you  
17 aware either way whether there were other ex-KGB  
18 officers engaged with your company providing  
19 intelligence in around 2005/2006?

20 A. I believe there were.

21 Q. A computer was seized, taken, by the police from  
22 RISC Management in early 2006. Were you aware of that?

23 A. Yes, I am, sir.

24 Q. And, again, whose laptop was that?

25 A. I think it was Dan Quirke's.



1 Q. It was Mr Quirke's. So is that a machine we should ask  
2 him about --

3 A. Absolutely, sir.

4 Q. -- later. Let me turn to Mr Litvinenko directly, then,  
5 please. Did you meet a man called Alexander Litvinenko?

6 A. Yes, sir.

7 Q. Can you help as to when it was that you first met him?

8 A. I think in early 2001, maybe 2002.

9 Q. What were the circumstances of that meeting in  
10 2001/2002?

11 A. I believe it was with Mr Berezovsky at his office, and  
12 I was introduced to Mr Litvinenko as a person that  
13 I should get to know.

14 Q. Who had arranged the meeting?

15 A. I'm not sure if it was a specific meeting or  
16 Mr Litvinenko was just at Mr Berezovsky's office, but  
17 I had an occasion to be introduced to him.

18 Q. What was Mr Berezovsky's assessment of Mr Litvinenko as  
19 reported to you at around the date of your first  
20 meeting?

21 A. Yes, he was a trusted party to Mr Berezovsky and that's  
22 why he introduced me.

23 Q. Did Mr Berezovsky at that meeting or otherwise indicate  
24 why it was he thought you should meet Mr Litvinenko?

25 A. Just thought that it would be useful for our business.

1 Q. Did you take that forward before 2006 or not with  
2 Mr Litvinenko?

3 A. I think that was at the time when Mr Evans, Garym Evans,  
4 would have been introduced to Mr Litvinenko for  
5 operational purposes.

6 Q. We've heard from him, but in terms of your engagement,  
7 Mr Hunter, did you deal with Mr Litvinenko yourself  
8 again before 2006?

9 A. I would have seen him on a number of occasions, but not  
10 specifically for anything -- certainly nothing  
11 operational.

12 Q. Are these occasions documented anywhere?

13 A. No.

14 Q. In general terms, the purpose of the meetings on these  
15 subsequent occasions was what?

16 A. Chance meetings.

17 Q. Chance meetings?

18 A. Chance meetings.

19 Q. How would you be having chance meetings with  
20 Mr Litvinenko?

21 A. He could have been at Mr Berezovsky's office where he  
22 positioned himself fairly frequently, and he was  
23 a person around Mayfair, so there were chance meetings.  
24 I'm sure there were other organised meetings, but  
25 nothing that I can specifically tie down to a subject

1 matter.

2 Q. So you were making visits, were you, to Mr Berezovsky's  
3 office?

4 A. When needed, yes.

5 Q. When needed, and that presumably was on a commercial  
6 basis for these services provided by your company?

7 A. Yes, sir.

8 Q. So the chance meetings at Mr Berezovsky's office, were  
9 you there with a common purpose for Mr Litvinenko, or is  
10 it purely coincidental? In other words, were you having  
11 meetings with him?

12 A. No, no, but with Mr Berezovsky, but if Mr Litvinenko was  
13 there and Mr Boris Berezovsky wanted him at the meeting,  
14 then he would join us.

15 Q. Right. What was your assessment of Mr Litvinenko in  
16 terms of this world, this industry of security  
17 intelligence, number of meetings with him?

18 A. I found him to be a professional intelligence person.  
19 He clearly knew his subject matter very well. He was  
20 very well connected, he attained a reasonable rank in  
21 the KGB, which tells you something about his position  
22 there. And we got on well.

23 Q. What was your assessment of the quality of the  
24 intelligence he was describing at any of these meetings?

25 A. I certainly was not convinced about the intelligence

1 being completely legitimate. I thought he would put  
2 a political slant into some of the conversations we had,  
3 and I think this was borne out also on some of the  
4 reports that we got, where certainly Cliff Knuckey and  
5 I discussed that the material needed to be diluted into  
6 being usable as far as a commercial intelligence firm  
7 was concerned.

8 Q. You talk there of the intelligence not -- some of it not  
9 being legitimate, a political slant, it needing to be  
10 diluted into a commercially usable form.

11 A. Yes, sir.

12 Q. Putting that perhaps into slightly plainer English, what  
13 was wrong with the intelligence reports he was  
14 providing, in terms of their integrity and reliability?

15 A. I guess for us being, again, going on the commercial  
16 side, we weren't really interested in the politics that  
17 was going around in his life and those clearly of  
18 Mr Berezovsky. We were more concerned about the task in  
19 hand and to be specific about that particular matter and  
20 be focused on it. Not necessarily about any other  
21 parties that he felt he could gain any sort of -- yes,  
22 he could gain from mentioning in a report to us.

23 Q. To spell it out, which individuals and with what  
24 purpose?

25 A. Well, it was all government -- Russian government, so

1 Mr Putin and others.

2 Q. In your judgment, what proportion of the product or  
3 material he provided you with had a genuine commercial  
4 value, as distinct from it being background politics and  
5 so on?

6 A. 25, 30 per cent. It was certainly no more than that.

7 Q. Were you providing Mr Litvinenko directly with any  
8 instruction to provide material in the period 2000 to  
9 2006?

10 A. Not that I can recall.

11 Q. In that period, whether instructed by you or others in  
12 your company, are you aware of any instruction he was  
13 given that would have exposed him to significant  
14 personal risk in terms of the Russian state?

15 A. Not from us, no.

16 Q. On the same theme, what was your assessment of him in  
17 terms of his continuing contacts in Russia, in other  
18 words sources of information in Russia; how up to date  
19 were they and what was the calibre of the source so far  
20 as you could determine it?

21 A. Again, probably I'm not the best person to ask on that  
22 one, but, again, from discussions --

23 Q. Discussions with whom?

24 A. With Cliff, Cliff Knuckey.

25 Q. Yes, Mr Knuckey.

1 A. -- would be that he had reasonable contacts, but maybe  
2 not as up to date as we'd like them to be.

3 Q. And reasonable contacts, insofar as you can, meaning  
4 what, more precisely?

5 A. People that would be able to answer some of the  
6 questions or instructions that we'd given him.

7 Q. Were you instructing him to make enquiry to obtain what  
8 would otherwise be sensitive information from government  
9 companies and so on, state-run companies in Russia?

10 A. Yes, all of the above. It depends on him as the  
11 individual how he would get that material.

12 Q. And he appeared able, did he, to mine sources in Russia  
13 for such intelligence?

14 A. On a number of occasions, yes.

15 Q. You've indicated on the other hand that some of this  
16 information appeared to be somewhat out of date.

17 A. Not the information was out of date, that some of the  
18 people that he was connected with were a little bit out  
19 of date and obviously not as accurate because obviously  
20 he wasn't travelling there any longer, he didn't have  
21 direct contact with the people in the country. Not  
22 necessarily the information is out of date, because  
23 that's not right.

24 Q. It's probably me not understanding it, but you said he  
25 appeared to have sources of intelligence within the

1 various targets, to use that expression, of your  
2 enquiries, and was providing valuable intelligence back  
3 to you on that basis. But what was it, then, that was  
4 out of date in terms of his reports?

5 A. No, not his reports. It was just deemed, again probably  
6 more from the operational side, that the contacts  
7 weren't as up to date as we would have liked them to be.  
8 The contacts that he's talking to, not the material that  
9 he's putting into a report, two different things. So  
10 I think whatever he was reporting back to the guys on  
11 the operational side was, say, 25 per cent, 20,  
12 25 per cent, was useful information.

13 Q. Useful and up to date in all senses?

14 A. Correct, yes.

15 Q. Whereas some of it was historic?

16 A. Correct.

17 Q. And therefore less weight would be attached?

18 A. Yes, or having a political slant to it.

19 Q. But I'm sorry to labour this, whatever proportion it was  
20 of the intelligence coming back through Mr Litvinenko,  
21 a proportion of it was apparently up to date and of  
22 significant value?

23 A. And accurate, yes.

24 Q. And accurate. And would have related to Russian state  
25 interests, whether the state machinery itself or

1 state-controlled companies and the rest?

2 A. Whatever the enquiry was.

3 Q. Right. Before we turn to 2006, are you aware that your  
4 colleague, Mr Knuckey, undertook in 2004 an  
5 investigation into two Chechen men who appeared to have  
6 been responsible for fire bombing the houses of  
7 Mr Litvinenko and a Mr Zakayev in October 2004?

8 A. I recall it, but not particularly well.

9 Q. Let me prompt your recollection, if I can. There had  
10 been an attempt to extort money from Mr Berezovsky. Two  
11 Chechen men claimed that Mr Berezovsky owed them money,  
12 arising from an episode in 2002 when Mr Berezovsky had  
13 been offered the chance to purchase plans for a small  
14 nuclear bomb, a so-called nuclear suitcase bomb. In  
15 2004, two men were repeatedly trying to contact  
16 Mr Berezovsky through Mr Litvinenko. They were not  
17 paid. Then there was this fire bomb attack on their  
18 houses, which on one interpretation was by way of  
19 revenge for non-payment by Mr Berezovsky.

20 Does any of that trigger your memory as to  
21 Mr Knuckey's enquiry into those responsible?

22 A. What year was that?

23 Q. 2004.

24 A. I can recall there was an incident, a significant  
25 incident, obviously, but I can't remember the



1 investigation again. That was something that would have  
2 been carried out by Mr Knuckey or others.

3 Q. All right. At any time, were you aware of any specific  
4 threat made by anybody, including your clients, or the  
5 subject of enquiry, to Mr Litvinenko himself?

6 A. No, sir.

7 Q. All right. Turning to 2006, Mr Evans had left in the  
8 early part of 2006 and been replaced by Mr Quirke, and  
9 we're going to hear that Mr Litvinenko was providing  
10 services to the company as part of a specific enquiry.  
11 Were you aware, Mr Hunter, of the circumstances in which  
12 he became engaged as a subcontractor, if you like, of  
13 RISC Management Limited in 2006?

14 A. I knew he was one of a number of people that we were  
15 employing on that basis, but, again, the specifics  
16 I don't know.

17 Q. Do you know the subject matter of enquiry in relation to  
18 which he was engaged in 2006?

19 A. No, I don't, sir.

20 Q. What if any direct involvement did you have in  
21 Mr Litvinenko's operational work in 2006?

22 A. Very little, if anything. Again, there was a team of  
23 people that were working with him, or certainly  
24 individuals within the firm working for him or with him,  
25 sorry, directly.

1 Q. You're still CEO?

2 A. Yes, sir.

3 Q. The operations director, whatever other titles he had,  
4 was still Mr --

5 A. Knuckey.

6 Q. -- Knuckey, and Mr Quirke is there, operations as well,  
7 is he, underneath Mr Knuckey in the hierarchy?

8 A. He was an investigator, yes.

9 Q. So there's the basic hierarchy. When would you become  
10 involved in specific operational matters, given that  
11 hierarchy?

12 A. Only if asked to participate, whether that be from  
13 a client side or from the operators that want me to join  
14 for whatever reason.

15 Q. If I could just refer you, Mr Hunter, to page -- we're  
16 back to INQ015805 in your bottom right-hand corner.  
17 It's the fifth page of your statement.

18 A. Yes.

19 Q. I'd just like to bottom out, if we can, your knowledge  
20 and understanding of intelligence provided by  
21 Mr Litvinenko in connection to former Yukos executive  
22 Mr Khodorkovsky.

23 A. Yes, sir.

24 Q. You've dealt with this. Just to use your own  
25 introduction:

1           "The Russian Federation's prosecution of Yukos  
2           executive Mikhail Khodorkovsky is a well publicised case  
3           with significant implications in relation to human  
4           rights abuse. Both Yukos and Altus Investment  
5           Management Limited instructed us to conduct due  
6           diligence in relation to current and former Yukos  
7           directors and senior employees. These individuals had  
8           fled Russia and relocated to the UK following the arrest  
9           of Mikhail Khodorkovsky. RISC would have taken  
10          instructions from two lawyers at Yukos and Patrick  
11          de Vink at Altus."

12           So that's the general background to this line of  
13          enquiry, and due diligence reports were effectively  
14          being prepared to provide Altus Investment with  
15          reassurance that they were conducting their business  
16          lawfully insofar as they were with corporations or  
17          otherwise in the Russian state. Is that right?

18   A. Yes, sir.

19   Q. Looking through your statement there, what if any was  
20          the basic role of your company at the time in providing  
21          strategy intelligence support to Yukos during that  
22          period?

23   A. For this particular situation, there were a number of  
24          Yukos employees who came to the UK for -- or to claim  
25          political asylum and certainly to flee from Russia. We

1 were there to help not only the individuals but the  
2 investment company that were looking after them in  
3 providing due diligence that would get them through the  
4 process of getting bank accounts and such like to ensure  
5 that there was a KYC -- know your client and anti-money  
6 laundering process which was satisfactory, if you like,  
7 for opening purposes, and we regularly updated those  
8 just in case the individual's circumstances had changed  
9 at all.

10 Q. This is quite a major contract for the company.

11 A. It was, sir.

12 Q. To your knowledge, what was Mr Litvinenko's role in  
13 relation to that wider contract?

14 A. Fairly minor to be fair, because he was used as  
15 a confidential source with others that were there to  
16 perhaps just plug the gaps that we had from open source  
17 material, and where further questions or further  
18 interrogation was needed for those particular  
19 individuals to get them through that process, or  
20 otherwise, because a number were rejected, but he would  
21 have played a very small part.

22 Q. Given that small part, are you aware of anything that  
23 would suggest that small part led to a specific threat  
24 to him at about the relevant time from the Russian state  
25 or others with an interest in that enquiry?

1 A. No, sir, not to my knowledge.

2 Q. Did you also, as a company, conduct enquiries of Yukos'

3 former second in command who was based in Israel?

4 A. Yes, we did, sir.

5 Q. His name?

6 A. Mr Nevzlin.

7 Q. And in fact you set up company premises in Israel in

8 2001/2002.

9 A. About that -- yes, about that time, sir, yes.

10 Q. Were his interests part of the security intelligence

11 work the company was conducting?

12 A. There were two separate matters, so we had the

13 individuals who fled to the UK, he had in fact gone to

14 live in Israel, so completely different.

15 Q. Right. Were you conducting enquiries on his behalf in

16 terms of Yukos?

17 A. We were assisting him as with others.

18 Q. To do what?

19 A. To ensure that there was no change in status whatever

20 his -- security, we had security consultancy for him in

21 Israel, that was one of the reasons we started the

22 business over there, and to generally support him and

23 his family there.

24 Q. Were you involved in that contract?

25 A. No, Nigel Brown was looking after that one.

1 Q. Do you know either way whether Mr Litvinenko was  
2 involved in that contract?

3 A. I'm not sure, sir.

4 Q. What records would exist now of these enquiries?

5 A. I would have thought none.

6 Q. When would they have been destroyed or removed?

7 A. Just going back to what I said originally, if the  
8 enquiry had finished, then I would have thought that  
9 things would have been shredded.

10 Q. And what, computer files presumably cleaned up?

11 A. All of the above, yes.

12 Q. Did your company do work for the SPI Group, Stolichnaya?

13 A. Yes, we did.

14 Q. I'm looking at 15807 of your statement now, Mr Hunter.  
15 In very general terms, what was the purpose of any  
16 enquiries on behalf of the Stolichnaya Group?

17 A. I can't recall what specifically was Mr Litvinenko's  
18 part there, but it would have been some intelligence  
19 gathering in Russia, but specifics I don't know.

20 Q. Are you aware of any enquiries relating to the industry  
21 of vodka production?

22 A. I'm aware of it, but I don't think that Mr Litvinenko  
23 was anything to do with that.

24 Q. Just going through that same page, Mr Hunter, you were  
25 asked by the police about various documents, and so far

1 as you're aware, was Mr Litvinenko ever instructed by  
2 you to conduct enquiries relating to Spain? I'm looking  
3 at the top of 15807.

4 A. Yes, I'd no knowledge of that.

5 Q. Do you have any knowledge either way as to whether he or  
6 your company conducted work on behalf of Alfa Group,  
7 Mikhail Fridman?

8 A. Yes, I've no idea, sir.

9 Q. You were shown exhibit PT67, a document titled "Project  
10 G"; did that mean anything to you?

11 A. It meant nothing to me, no, sir.

12 Q. What knowledge do you have, Mr Hunter, of any due  
13 diligence reports prepared in relation to any of  
14 Messrs Berezovsky, Patarkatsishvili or Altus?

15 A. Again, I can't really comment on the operational side.  
16 I don't have that knowledge.

17 Q. Do you have any knowledge of an instruction relating to  
18 a Vladimir Gusinsky?

19 A. No, sir.

20 Q. The police asked you about a whole series of other  
21 potential instructions, but you again were not aware of  
22 that?

23 A. No, sir.

24 Q. Turning to INQ15809, please, your final paragraph, you  
25 were shown a series of documents relating to the First

1 Curacao International Bank, FCIB, recovered from exhibit  
2 MW100, which is the company's Sony VAIO laptop, and you  
3 were specifically asked whether you knew of or had ever  
4 conducted investigations on behalf of clients into the  
5 activities of a person called Semion Mogilevich. What  
6 was your response to that?

7 A. Again, I had no knowledge of this.

8 Q. Had you heard of him?

9 A. I hadn't, no.

10 Q. You were asked about a report entitled "Main  
11 characteristics of Russian organised crime, 2003-2005".  
12 Did you have any knowledge of that report?

13 A. No, sir.

14 Q. Had you instructed or to your knowledge your company  
15 instructed Alexander Litvinenko to compile it?

16 A. No, sir.

17 Q. I anticipate we're going to hear from Mr Quirke,  
18 Mr Hunter, as to reports produced relating to  
19 a Mr Gordievsky [sic], who was an agriculture minister  
20 in Russia in charge of matters such as business permits  
21 and production rights for vodka, whom it was believed  
22 was behind the Stolichnaya case representing the Russian  
23 government in that matter. Now, were you aware of any  
24 such enquiry conducted by your company involving  
25 Mr Litvinenko and effectively managed by Mr Quirke?



1 A. I didn't know of Mr Litvinenko's participation in that  
2 instruction.

3 MR EMMERSON: Excuse me, would you just give me a moment.  
4 (Pause)

5 MR DAVIES: If I have the name wrong, Mr Gordeyev.

6 A. Again, I know the name, sir.

7 Q. How do you know the name? First of all, is it the same  
8 person and how do you know the name?

9 A. The name is associated with that enquiry. All I'm  
10 saying is I don't know that -- I didn't know that  
11 Mr Litvinenko had any dealings in that case.

12 Q. Were you aware that your company at least had been  
13 instructed to make enquiry as to the issue of  
14 Stolichnaya Vodka in or around 2006?

15 A. I was aware of that enquiry, yes.

16 Q. Who was responsible for conducting it, then,  
17 operationally?

18 A. It would have been something that Cliff Knuckey would  
19 have dealt with and allocated that to the parties  
20 involved in the business. I don't know who that  
21 obviously party was.

22 Q. All right, so Cliff Knuckey as operations director would  
23 have had primary responsibility for --

24 A. Allocating that to -- instructions.

25 Q. -- allocating people to the enquiry. You as CEO would

1           have become engaged on what basis if at all?

2   A.   Engagement with the client and taking instructions.

3   Q.   Did you have meetings in connection with that

4           instruction with the client as the enquiry went on?

5   A.   I would have had meetings with the client, yes.

6   Q.   In order for you to be briefed to conduct such meetings,

7           who would be responsible for briefing you?  Who was

8           responsible for briefing you?

9   A.   In the main, Cliff Knuckey.  Again, specifically,

10           I can't recall if Mr Quirke was also involved, but

11           certainly Mr Knuckey would.

12   Q.   Was Mr Litvinenko party to any such briefings before you

13           met such clients?

14   A.   I certainly can't recall any briefings with him in

15           attendance, no.

16   Q.   Were these briefing meetings documented in any way?

17   A.   No, sir.

18   Q.   Would the meetings with the client be documented in any

19           way?

20   A.   Not to my knowledge, sir, no.

21   Q.   Where if at all would the product of the enquiry now be

22           retained?

23   A.   I don't think there is a product for it, sir.

24   Q.   At the briefings and in any documents, if Mr Litvinenko

25           was a source or one of the sources for the enquiry,

1           would his name have been introduced to the client?

2    A.   Definitely not, sir.

3    Q.   Why not?

4    A.   Again, for anonymity purposes, we wouldn't disclose any

5           confidential sources to a client.

6    Q.   Have you heard the name Andrei Lugovoy?

7    A.   Yes, sir.

8    Q.   Prior to Mr Litvinenko's death had you heard the name

9           Andrei Lugovoy?

10   A.   I think I had, only so far as Mr Litvinenko wanted to

11          introduce Mr Lugovoy to our ops people.

12   Q.   Can you remember round about what period that was?

13   A.   I can't, sir, no.

14   Q.   Even the year?

15   A.   It would have been a few months before Mr Litvinenko's

16          death.

17   Q.   A few months before his death. And who told you he

18          wanted to introduce Mr Lugovoy to the ops people?

19   A.   Mr Knuckey.

20   Q.   Your response to that?

21   A.   The name didn't mean anything to me at the time, and

22          clearly it was an operational matter and if Mr Knuckey

23          thought it was of value to us, then I leave it to his

24          better judgment.

25   Q.   Have you heard the name Dmitri Kovtun?

1 A. No.

2 Q. Did Mr Knuckey come back to you in relation to  
3 Mr Lugovoy once he had exercised his better judgment?

4 A. Yes, sir.

5 Q. What was the outcome of that?

6 A. He wasn't impressed with what Mr Lugovoy could offer.

7 Q. I'll take that in slightly more detail. Had he met him?

8 A. Yes, he had.

9 Q. Relative to the name first being suggested as  
10 a possibility and Mr Litvinenko's death, can you put on  
11 the spectrum when it was that you were having  
12 a discussion as to Mr Lugovoy's --

13 A. Again, months before.

14 Q. Months before. What reservations was Mr Knuckey  
15 expressing, then, as to using Mr Lugovoy as part of your  
16 resources?

17 A. He just said that he wouldn't be able to add any value  
18 to us.

19 Q. Here is an ex-KGB officer who is purporting to have  
20 contacts perhaps in Russia, offering himself. What was  
21 it that Mr Knuckey was saying meant he had no value to  
22 you? Can you elaborate on what the problem was?

23 A. That was his judgment call at the time and I always had  
24 gone along with what he proposed. He himself was a very  
25 experienced ex-Scotland Yard detective who had been

1 involved in undercover work for a number of years, so,  
2 again, he was far more experienced than I at making that  
3 evaluation.

4 Q. Can you picture where it was you had the meeting to  
5 discuss Mr Lugovoy with Mr Knuckey?

6 A. I can't, no.

7 Q. I take it it's not documented?

8 A. No, sir.

9 Q. Did you not press him as to why it was that this  
10 potential source was of no value to you?

11 A. Not at all, sir, no.

12 Q. Were you aware of anything produced by Mr Litvinenko  
13 that had been considered by Mr Knuckey?

14 A. In what form, sir?

15 Q. In terms of intelligence, the product of intelligence,  
16 the quality of it.

17 A. Again, Mr Knuckey had the view that a small percentage  
18 of the information was of use to the business.

19 Q. Can you look at 15807 of your statement, Mr Hunter.  
20 It's specifically here as to the tasking, to use that as  
21 a verb, middle paragraph:

22 "The Stolichnaya tasking ..."

23 You've said this:

24 "In relation to the above tasking, Stolichnaya SPI  
25 Group, I have been asked if I am aware of any product

1           that Alexander Litvinenko provided to Cliff Knuckey  
2           in April or May 2006. I am not aware of such  
3           a document. I have been told that the report was  
4           declined by Cliff Knuckey as the information was  
5           substandard and not worthy of payment. The operational  
6           side of this instruction was solely dealt with by Cliff  
7           Knuckey. I do recollect that the instruction lasted for  
8           somewhere between 18 and 24 months."

9           Prompted by that, who was it -- you say "I have been  
10          told that the report was declined by Cliff Knuckey" --  
11          who was it who told you that?

12         A. Cliff Knuckey, sir.

13         Q. At which meeting was it that he is relating that it was  
14          substandard, can you remember?

15         A. I can't, no, sir.

16         Q. Can you remember in what way he said it was substandard  
17          information?

18         A. I just recall that he mentioned that it wasn't worth the  
19          money, but the specifics I don't know.

20         Q. I'll just come back to the final point. Insofar as you  
21          were aware of the precise work Mr Litvinenko was doing  
22          for your company, would his name ordinarily have formed  
23          any part of the report provided to your clients?

24         A. Not for this client or any other client.

25         Q. And you've given the reasons for that?

1 A. Absolutely, sir.

2 MR DAVIES: That's all I ask, thank you.

3 MR EMMERSON: I only have one question.

4 THE CHAIRMAN: Yes.

5 Questions by MR EMMERSON

6 MR EMMERSON: Just to clear up that question of names. You  
7 mentioned a connection between Mr Litvinenko and  
8 information supplied that you were aware of concerning  
9 a man called Gordeyev, do you remember?

10 A. Yes, sir.

11 Q. That would be Alexey Vasiliyevich Gordeyev, the  
12 agriculture minister of the Russian Federation, is that  
13 correct?

14 A. I think so, sir, yes.

15 Q. You know who Oleg Gordievsky is? You've heard that name  
16 before, Oleg Gordievsky?

17 A. I've heard the name, sir, but I can't remember in what  
18 context.

19 MR EMMERSON: Anyway, they're different people.

20 A. Okay, fine.

21 THE CHAIRMAN: Yes, thank you. Thank you very much. We'll  
22 break now until 11.30.

23 (11.20 am)

24 (A short break)

25 (11.30 am)

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MR DANIEL QUIRKE (sworn)

Questions by MR DAVIES

MR DAVIES: Would you give the Inquiry your full name,  
please?

A. Daniel Joseph Quirke.

Q. Mr Quirke, you have provided a number of statements to  
the police investigation in these proceedings, the two  
principal statements being that of 1 January 2007 and  
further detail as to those events in a statement dated  
19 September 2012.

A. Yes, sir, that's correct.

Q. There are five other much shorter statements dealing  
with production of exhibits and phones and matters of  
that kind, which we'll come to in due course?

A. Yes, sir.

Q. As at the date of your statement of 4 January 2007,  
Mr Quirke, you started by saying that you were "an  
investigator and financial investigator working for  
RISC Management", and you'd worked at the premises for  
about 19 months.

A. That's correct, yes.

Q. Now, that being the case, can you put a date on when it  
was that you joined RISC Management?

A. I believe early in 2006. Prior to that, I'd worked for  
RISC Global which was a subsidiary company run by



1 Mr Cliff Knuckey, and that was absorbed into

2 RISC Management in the early part of 2006.

3 Q. I'll come on to the hierarchy in a moment. Can you help  
4 with your professional background, Mr Quirke?

5 A. A former customs officer and I have worked with the  
6 police service as well.

7 Q. In what year did you join RISC Global?

8 A. Late 2005.

9 Q. Just in terms of years and your status in your previous  
10 employment, within Her Majesty's Customs & Excise, what  
11 role were you performing --

12 A. I was a senior officer.

13 Q. -- for what period? What does that mean?

14 A. I ran cases, I ran a team of investigators investigating  
15 whatever was tasked at the time. It could be up to 20  
16 officers. It might be just two. It depended on what  
17 was going on at the time.

18 Q. In headline terms, these were on occasion relatively  
19 major tax-based enquiries on behalf of HMCE or other  
20 things?

21 A. Originally, I was a drugs -- on a drugs squad, on  
22 a cocaine target team, and then after I'd done five  
23 years on that, I went to a financial team to investigate  
24 the financial side of those crimes.

25 Q. This was at a time when HMCE was directly responsible

1 for the investigation and prosecution of major  
2 importations of --

3 A. Drugs.

4 Q. -- drugs. Over what period of time were you engaged in  
5 an investigative role for HMCE?

6 A. From a junior level to HO level, probably the best part  
7 of 20 years.

8 Q. Starting when, roughly speaking?

9 A. Early 1990s, 1992.

10 Q. You've mentioned -- I think you mentioned work for the  
11 police service?

12 A. I was attached to the regional crime squad for the best  
13 part of a year.

14 Q. When was that, Mr Quirke?

15 A. That was in 1995 and it was with -- I think it was  
16 number 6 regional crime squad, Harlow.

17 Q. Was that some form of secondment attachment from HMCE?

18 A. Full time -- it was a swap. A police officer went to  
19 the customs and a customs officer went to the police.

20 Q. What year did you leave customs and --

21 A. 2001.

22 Q. 2001, and what did you do between 2001 and 2005?

23 A. Basically, I was a freelance risk manager, and then  
24 I was asked to go and work for RISC, the company.

25 Q. At whose invitation was that?

1 A. Via a friend who mentioned me to Cliff Knuckey.

2 Q. So within the company it was Cliff Knuckey?

3 A. Yes.

4 Q. By September 2012, I believe you were by then

5 effectively self-employed again.

6 A. Yes.

7 Q. The nature of that work, you also worked, you said, with

8 ex-military-type contractors, providing the same

9 security, investigation and surveillance work?

10 A. A lot of that, yes.

11 Q. Correct? Are you still doing that?

12 A. Not at the moment, no.

13 Q. As part of your training and work for customs and/or the

14 regional crime squad, were you trained in covert

15 investigations and source handling methods?

16 A. Yes.

17 Q. Did that training have application to your work for

18 RISC Global and subsequently RISC Management?

19 A. Yes, it did.

20 Q. In what way did the training transpose to your duties

21 for them?

22 A. One as a source handler, I was an experienced source

23 handler dealing with informants, and the information

24 they provide. I was also surveillance trained and been

25 a target officer for ten years doing surveillance on

1 a daily basis, and I'd also undergone a financial  
2 training on a financial course, at that time was by  
3 NCIS, you had to be on an approved list of financial  
4 investigators, and --

5 Q. NCIS being -- we will know, but a wider audience may  
6 not, acronym for what?

7 A. National Criminal Intelligence Service, it's now gone,  
8 I believe, it's been absorbed, and that basically had  
9 a list of approved officers, police and customs, who  
10 could make and undertake financial enquiries.

11 Q. Did you have any specific training, background knowledge  
12 or otherwise in relation to Russia?

13 A. None at all.

14 Q. Did you speak Russian?

15 A. No.

16 Q. When you joined the company, did you take over from  
17 another person?

18 A. Eventually I took over the work -- some of the work for  
19 Garym Evans.

20 Q. You say "eventually". Was there a transition period,  
21 a handover period effectively?

22 A. There was a transition period from the work I was doing  
23 from RISC Global to RISC Management, then he was leaving  
24 the company so there were changes in the structure  
25 internally.

1 Q. Where did you fit in the hierarchy, Mr Quirke?

2 A. Right at the bottom. I was the investigator, so I was

3 tasked by those above me to do whatever was required.

4 Q. We have heard from Mr Hunter who was the CEO.

5 A. Yes.

6 Q. Did you ever attend operational meetings with him?

7 A. Yes.

8 Q. How regularly?

9 A. There were boardroom meetings, probably later on, they

10 were decided to be a good thing and they were every

11 week, every fortnight, or if there was a specific new

12 task coming in or a new contract, then there would be

13 a meeting.

14 Q. Are we at Cavendish Place now?

15 A. Yes.

16 Q. And RISC Management?

17 A. Yes.

18 Q. As distinct from RISC Global. Now, those weekly

19 meetings, to what extent was the detail of any

20 operational investigation discussed with Mr Hunter?

21 A. Mr Hunter sat in and basically Cliff Knuckey would lead

22 the forum with the various jobs that had been assigned,

23 and there would be reports, you would report in what had

24 and hadn't been done, what problems there were, and

25 timescales, what was needed to be done, further

1 enquiries, and so everyone was aware roughly of what was  
2 going on on all the jobs.

3 Q. Were these meetings documented so far as you're aware?

4 A. Not formally. I think some people took their own notes,  
5 some people would bring their notes in of their  
6 investigation as to dates, so they could refer to them,  
7 but there was no formal writing down of meetings in the  
8 boardroom.

9 Q. The company, no doubt, had more than one investigation  
10 under way at any one time.

11 A. Oh, loads, sir.

12 Q. And more than one person performing your role as  
13 investigator accordingly?

14 A. Could be six or seven, maybe more at one time.

15 Q. As to the conduct of these weekly meetings, then, whilst  
16 you said Mr Knuckey would take the lead, would  
17 investigators from other enquiries be present in the  
18 boardroom when you related the progression of your  
19 investigation?

20 A. Yes.

21 Q. How did that preserve or tend to preserve the  
22 confidentiality of what was being discussed?

23 A. Names were not mentioned. Only the result of the  
24 investigation, what was going on, as to the operation.  
25 But sensitive information was kept, you know, under

1 wraps.

2 Q. Would the client name be mentioned?

3 A. Sometimes but not necessarily, not as a matter of

4 course.

5 Q. And source names?

6 A. No.

7 Q. Ever?

8 A. It's a small company, people are not stupid, they can

9 work out who is doing what, who's meeting what, who's

10 saying what, but, no, it was kept very discreet.

11 Q. How would you make a record of an investigation as it

12 proceeded, Mr Quirke, in general terms?

13 A. I would open up a case file.

14 Q. Meaning what? Document, computer?

15 A. It would be a folder -- yes, well, both, I would have

16 emails, I would have a report, I would have documents

17 coming in, I may have CDs or photographs, and they'd all

18 be collated and put in my locker at seal/press.

19 Q. Was your method from what you could see different to any

20 other investigator's method?

21 A. No, everybody had a locker with a key to it and we only

22 had the one key. There was only one key that I was

23 aware of.

24 Q. What happened to such records at the end of any enquiry?

25 A. They were destroyed.

1 Q. Who was responsible for determining when a record of  
2 enquiry would be destroyed?

3 A. Well, the case officer would have to go through his own  
4 records, but it would also be brought to you by  
5 Mr Knuckey, basically to be tidy, not to leave things  
6 lying about. If it wasn't required, to destroy it.  
7 Anything sensitive was destroyed as quickly as possible.

8 Q. What method was used to destroy things, if it was hard  
9 copy material?

10 A. Cross-cut micro-fine shredder.

11 Q. And storage media for computers such as disks and memory  
12 sticks and the like?

13 A. In your own locked drawers, locked press --

14 Q. Locked press?

15 A. I had a large cabinet with locks on it, and I could put  
16 my stuff in it, lock it up, and I had the key, and take  
17 it away, and if anybody else wanted to get in, they'd  
18 have to break the lock.

19 Q. What would happen to storage media, computer storage  
20 media, at the end of an enquiry if that media contained  
21 sensitive material?

22 A. I believe it was destroyed. The IT officer would do  
23 that and he also carried out reviews on files, your own  
24 work, monitored you basically, to make sure there  
25 weren't unnecessary documents on your drive.



1 Q. Did you maintain computer-based records, folders, of  
2 enquiries as they went on?

3 A. Yes, sometimes.

4 Q. In what way were they protected from unintended  
5 disclosure?

6 A. It was a standalone laptop, it wasn't directly connected  
7 to the network, and the IT side looked after the  
8 security of the whole system and my laptop.

9 Q. Standalone, not network connected?

10 A. Not networked. It had a network cable. Sometimes  
11 they'd use that, sometimes they didn't.

12 Q. Again, sorry to labour the point, at the end of any  
13 investigation, what would happen to the records of  
14 investigation, records of meetings, documentation of  
15 that kind?

16 A. They would be destroyed.

17 Q. What process was followed to destroy the computer-based  
18 records?

19 A. The computer was given to the IT department, and they  
20 wiped it.

21 I also had my own removal disk system to -- any  
22 documents I could read, if I didn't like it or it was  
23 irrelevant, I could destroy it and overwrite it, and it  
24 would be gone.

25 Q. In terms of printing files from your standalone

1 computer, what was the mechanism for that if you wanted  
2 to do that at Cavendish Place?

3 A. There was a network printer.

4 Q. And the security of the network printer was down to  
5 whom?

6 A. I believe that would have been in charge of -- it was  
7 directly outside the IT office, so it was there and it  
8 was plainly visible, so you could see who was going to  
9 and from it.

10 Q. In terms of protecting the names of sources in  
11 particular, Mr Quirke, how would you, with your  
12 background, describe the culture at RISC Management to  
13 protect the sources of information?

14 A. It was very good. We didn't -- there was no record of  
15 names, it was done, people knew who it was through  
16 Mr Hunter, Mr Knuckey, and then the officer handling  
17 that source, and it wasn't widespread or given out or  
18 written down in documents that were freely available.

19 Q. We'll come on to it, but I think you worked with  
20 Mr Litvinenko on some lines of enquiry.

21 A. Yes, I did, sir.

22 Q. So far as you are aware, was his name ever forwarded as  
23 part of any report, written or oral --

24 A. No, it wasn't, no, it wasn't.

25 Q. -- arising from that enquiry?

1 A. His name was never put in any reports.

2 Q. Never put in any reports?

3 A. Not by me, no.

4 Q. In terms of any meetings you attended, if you did, was  
5 his name ever introduced as a source orally to your  
6 clients?

7 A. No, not to the clients, no.

8 Q. To state the obvious, but why would it be that his name  
9 would not be introduced?

10 A. Because he is a confidential source and to keep him  
11 safe.

12 Q. Looking at the projects or lines of enquiry you dealt  
13 with with him, what was your assessment of the degree of  
14 risk had his name not been kept safe? Do you feel able  
15 to assess that?

16 A. Mainly with hindsight -- at the time, I was aware he was  
17 aware for his own security and safety, and that he'd had  
18 problems in the past. So that much I was aware of, and  
19 I took that into consideration.

20 Q. Let's turn to your introduction to Mr Litvinenko,  
21 please, because I'm not going to go through again the  
22 nature of the industry generally and so on. We have  
23 heard that from others. You were introduced as an  
24 investigator in that capacity.

25 A. Yes, sir, I was.

1 Q. We will deal with the practicalities insofar as you  
2 applied them in the wider context. When did you first  
3 meet Mr Litvinenko and in what circumstances?

4 A. In, I believe, February, end of February, beginning  
5 of March 2006, at RISC's headquarters.

6 Q. By reference to what do you give us that rough date?

7 A. My recollection at the time when the witness statement  
8 was taken, I --

9 Q. Which was January 2007?

10 A. Yes.

11 Q. So in January 2007, you said it was February or March.

12 A. Yes, sir.

13 Q. Shortly before his previous handler met the company?

14 A. That's right, yes. There was a handover effectively.

15 Q. What were you told about him in terms of prior knowledge  
16 before you met him?

17 A. That he was Russian, he was ex-FSB, he was very  
18 well-connected, that he was associated to  
19 Boris Berezovsky, and that I'd be meeting him and that  
20 we'd be working with him.

21 Q. So far as you're aware, was there any form of file, hard  
22 copy or computerised, in relation to Mr Litvinenko?

23 A. None. It was all done verbally. He was brought up in  
24 the lifts, we went to the conference room.

25 Q. What were you told as to the existing and, secondly,

1 future intended working relationship with Mr Litvinenko?

2 A. There was a project of interest regarding Stolichnaya,  
3 and that was going to be what he would assist us with.

4 Q. On how many occasions prior to his death did you  
5 subsequently meet him then or --

6 A. I believe five or six, and I spoke to him on the phone  
7 a few times quite a bit as well.

8 Q. On the phone a few times?

9 A. Yes.

10 Q. We'll come to that too.

11 Across the piece -- we'll come on to individual  
12 lines of enquiry now, but across the piece, what was  
13 your assessment of him in terms of maturity and  
14 understanding of the industry in which you were  
15 operating?

16 A. I thought he was very intelligent and industrious, but  
17 I thought he was quite new to business, which isn't that  
18 surprising being Russian, because it's not a capitalist  
19 country, so he was in London trying to make a go of it,  
20 so I think it was early days for him. He could see some  
21 of the things, he believed everything he said was a gem,  
22 but it wasn't relevant, it might be to someone else, but  
23 it wasn't to us, and the work had to be more specific  
24 and more targeted.

25 Q. What impression if any did you gain as to his commercial

1 sense?

2 A. He was learning.

3 Q. Yes, from what basis?

4 A. Daily experience, I think, and as he went on.

5 Q. What impression did you get -- well, let's go to the  
6 first meeting. Where was it, what was discussed?

7 A. It was in the boardroom at RISC Management in  
8 Cavendish Place.

9 Q. What did Mr Litvinenko tell you in that first meeting,  
10 if it was the first meeting, as to the circumstances of  
11 his departure from Russia and matters of that kind?

12 A. He had been imprisoned and he was basically persona non  
13 grata over there, he'd had problems with the  
14 establishment, and he'd had to leave Russia.

15 Q. You provided a bit more detail on your initial  
16 statement, Mr Quirke, which I'll put up, just because it  
17 promotes clarity. Could we have on screen, please,  
18 INQ002839 and the second paragraph?

19 A. Yes, it would not be safe for him to be in Russia.

20 Q. I'll just read it into the record:

21 "Alexander had told me that he had had to leave  
22 Russia having been arrested and imprisoned by his former  
23 employers because he didn't agree with what they wanted  
24 him to do. He had been deemed an enemy of the state and  
25 was forced to flee because of his views. He had said he

1           would not have been safe in Russia. He disclosed this  
2           to me over a number of conversations over a number of  
3           meetings. It was obvious to me that he was what anyone  
4           would call a dissident. He had told me he was scared of  
5           the state apparatus of Russia, he was scared of Putin,  
6           and that he was a marked man. He told me he could never  
7           go back to Russia because he would be killed there. He  
8           was concerned about London because London is such an  
9           open city and people from Russia can come here and do  
10          whatever they want."

11        A. Yes, sir, that's correct.

12        Q. This is taken in January 2007, and I'm not seeking to  
13          test your memory, but does that paragraph reflect the  
14          reality of what was being said to you by him?

15        A. Yes, very much so.

16        Q. How was this manifest in what you observed as to the  
17          arrangements he followed for his personal security and  
18          security of data?

19        A. He would only speak to me, he'd phone me on my mobile,  
20          he wouldn't speak to anyone else in the office, I was  
21          his contact, so nobody else would do, that was his first  
22          line of safety.

23                I had observed him outside the building and he'd  
24          been taking surveillance measures. He was watching the  
25          entrance to see if other people were watching the

1 entrance, who was coming and going, and on another  
2 occasion I'd seen him basically walking up and down the  
3 street, basically trying to throw off any tail that may  
4 or may not have been on him, but he was very security  
5 conscious.

6 Q. What arrangements did you implement in terms of mobile  
7 telephones for him, Mr Quirke?

8 A. He was given a phone by RISC Management and that was to  
9 be the phone I was to contact him on.

10 Q. Did you provide details of that phone to the police?

11 A. Yes, sir, I did.

12 Q. Did he ever contact you on a phone other than that  
13 allocated to him by RISC Management for this purpose?

14 A. No.

15 Q. So far as you were aware of his methods and practices,  
16 did he follow relatively secure procedures?

17 A. I can't say for the other end of it, but I believed he  
18 was, yes. He was discreet and he'd make arrangements  
19 and he'd keep to them.

20 Q. In terms of more specific threats, Mr Quirke, do you  
21 remember him bringing up the death of somebody called  
22 Anna at some point in your conversations?

23 A. Yes, one day we were in the basically the kitchen having  
24 a coffee, and he told me about Anna, a journalist in  
25 Russia, who was a very good friend of his, who had been



1 killed, and that would only have been a few days or --  
2 before that. He was quite upset by it.

3 Q. Right. So he's relating a shooting that had happened of  
4 his friend Anna, a journalist, a few days before your  
5 conversation?

6 A. Yes, relatively, just before that. I don't know how  
7 many days, a week or what. But it was fresh to him, and  
8 he told me about it.

9 Q. Can you recall anything else about that conversation,  
10 anything else he said as to the consequences, if any,  
11 for him, a threat to him?

12 A. Well, he could be next, basically. He was worried about  
13 himself, that there might be a list or he might be on  
14 it.

15 Q. You addressed it in your January statement, INQ002846.  
16 See if this prompts the detail a bit, Mr Quirke. It's  
17 several years ago now. The final paragraph, please:

18 "Alexander had previously told me that he had been  
19 tortured when detained in Russia."

20 A. Yes.

21 Q. "He had told me that a friend of his called Anna,  
22 I cannot pronounce her surname, he told me that whilst  
23 she had visited the FSB headquarters in August 2006 she  
24 was invited to fire a pistol at their shooting range."

25 A. Yes.

1 Q. "When she did so she found that the targets at their  
2 shooting range had Alexander's face on them. He thought  
3 this was a message to him, as they knew she was a friend  
4 of his. She later died and he was in our offices  
5 shortly after she was killed and he said she had been  
6 killed by the Russian state. He said there was no one  
7 else who would do that and it was because she was  
8 causing too much trouble."

9 A. Yes, that's what it said.

10 Q. So far as you're aware, was he intending to take  
11 additional security measures for his own protection or  
12 that of his family, consequent upon the death of the  
13 journalist called Anna?

14 A. I think it had spooked him, and I would presume he would  
15 have, but I wasn't outside the building with him, so  
16 I can't say what security measures he was taking, but he  
17 was very wary of what had gone on.

18 Q. Now, Mr Quirke, in your original statements -- I'm  
19 looking now at the statement of 13 February 2007 and  
20 that of 15 February 2007. You assisted the police with  
21 a number of mobile telephones.

22 A. That's correct, sir.

23 Q. Two mobile phone top-up cards, which were used to top up  
24 the two supplied phones. So can you just reflect on how  
25 many mobile telephones the company provided to

1 Mr Litvinenko?

2 A. I'd only provided him with one and I'd only ever been  
3 contacted by one.

4 Q. You relate three mobile phone card numbers on there.  
5 The first ends 6174.

6 A. Yes, sir.

7 Q. Are you aware of whether or not that was one of the  
8 phones provided by RISC Management to him?

9 A. From recollection, I believe that's the main one that  
10 I spoke to him on.

11 Q. There's a further mobile phone number ending 469.  
12 Looking through your statement there, it would appear to  
13 be post-it notes and what have you going with it in  
14 relation to top-up payments on that card.

15 A. Yes.

16 Q. Now, by reference to that, does that appear to be  
17 a phone again that was given to him by RISC Management,  
18 mobile ending 469?

19 A. I've no knowledge of that one. It may well have been  
20 given to him before, but it's not by myself.

21 Q. There is a further mobile number down the page,  
22 Mr Quirke, ending 160. You were asked about that. Were  
23 there any company records that related to that phone?

24 A. I think that's a phone card.

25 Q. All right. To go back to 469, you've indicated there's

1 a handwritten note by you to say the phone had been  
2 topped up in February 2006 by GBP 50. Does that not  
3 help as to whether it was a RISC Management phone?

4 A. Mr Litvinenko had his own phones that he was doing  
5 business on, and he was short of money, so we put  
6 forward money for his phones which was just us paying  
7 him so he could make calls. They weren't phones we had  
8 supplied or had information from. They were his  
9 business phones.

10 Q. Did you have any knowledge of the mobile phone number  
11 ending 160 from the company point of view?

12 A. I believe not, no.

13 Q. What was your impression of his apparent means at the  
14 time you were dealing with him in the period February  
15 to November 2006?

16 A. He was trying to establish a business, he was working  
17 hard, I think he was short of money. I think monies  
18 that he'd previously got from -- as like a retainer from  
19 Mr Berezovsky had ceased and that left a hole in his  
20 finances.

21 Q. Are these circumstances something that he discussed  
22 directly with you or that were reported to you?

23 A. Comments he made, comments he made.

24 Q. To you directly?

25 A. In passing, yes.

1 Q. Across the period, and differentiate within the period  
2 if it helps you, but between about February 2006 when  
3 you first met him and his admission to hospital in  
4 early November 2006, what level of communication were  
5 you having with him and in what way?

6 A. There would be the scheduled business meetings, there  
7 would be the conversations on the phone if I wanted to  
8 get him, but mainly it was him getting me, and on  
9 a couple of occasions, he'd just basically popped into  
10 the office to give an update as to what was going on and  
11 we had coffee and we chatted, I got to know him a bit  
12 better and I think he was getting to know me a bit  
13 better. He wanted to find out what kind of person  
14 I was.

15 Q. How many formal scheduled meetings do you remember  
16 having with him at your offices?

17 A. Three or four.

18 Q. Is there any diary entry, documented record of this,  
19 that we can look at now to quantify it more precisely?

20 A. None that I am aware of, no.

21 Q. So you're going entirely from memory?

22 A. From memory, yes.

23 Q. Was there a specific project that you started working  
24 on, or what was the nature of your engagement so far as  
25 you were aware?

1 A. There was an ongoing project regarding Stolichnaya and  
2 a law case going on between the owner or the person who  
3 said he owned it, and the Russian state, who said they  
4 had the recipe for Stolichnaya and it had been stolen.

5 Q. Right, let's try and explain this slightly more fully.  
6 So there's a handover meeting?

7 A. Yes, sir.

8 Q. Garym Evans and yourself and Mr Litvinenko. Was anybody  
9 else present at the initial meeting?

10 A. I believe Cliff Knuckey may have just come in to say  
11 hello, and then left and let us get on with it.

12 Q. In what language was the meeting taking place?

13 A. In English.

14 Q. Was the project involving vodka something that was  
15 already in existence as a line of investigation and  
16 enquiry?

17 A. I believe so, yes.

18 Q. Looking back now, can you remember any other specific  
19 project, specific project, that Mr Litvinenko was  
20 working on before his death so far as you were  
21 concerned?

22 A. No, it was that project and he was also gaining other  
23 intelligence which he gave to us to see if it was  
24 relevant, but most of it wasn't.

25 Q. The Russian project, did that involve enquiries of

1           anyone in particular or about anyone in particular?

2   A.   Yes, Mr Gordeyev --

3   Q.   Who was he?

4   A.   He was the agriculture minister, or soon to be  
5        agriculture minister, I'm not quite sure, but over the  
6        period I believe he became the agriculture minister.

7   Q.   What was the nature of the interest in him?

8   A.   I believe the client of Stolichnaya wanted to know what  
9        kind of people he would be up against in the courts,  
10       were they going to pursue him, could it be settled, what  
11       was going to happen in the long term, and they wanted  
12       the background on this man to see what type of person he  
13       was.

14  Q.   Can you try to summarise what was happening in Russia  
15       then with Stolichnaya Vodka, what was the whole point of  
16       this?

17  A.   I can.

18  Q.   Yes, do that.

19  A.   Basically, Russia's different to the UK and most other  
20       countries. You buy a licence to make vodka, so you pay  
21       the money upfront to the Russian state, and you get  
22       a certificate and you can go to any distillery and  
23       produce it and put your labels on it. It's not like  
24       over here where we have Johnnie Walker and they only  
25       make Johnnie Walker scotch. You can do it anywhere.

1 And it's very open to fraud.

2 You purchase a recipe, and that was what was in  
3 dispute, the recipe for Stolichnaya had been bought and  
4 taken outside of Russia, and that was the big dispute.  
5 I believe it has subsequently been settled, but there  
6 was two people making Stolichnaya, both saying they had  
7 the right to do it.

8 Q. Can we put up INQ016304, please. Just look at the  
9 explanation you gave in an earlier statement.  
10 19 September 2012. If we could start on the fifth line,  
11 please and highlight down to the fourth but last line.  
12 I'll just read into the record how you put in your  
13 statement, Mr Quirke, and we can take it from there.

14 "I did a bit of work around Stolichnaya Vodka where  
15 a Russian businessman obtained the rights to produce  
16 this label of vodka and moved to Cyprus from where he  
17 was producing and running this business. The Russian  
18 state, in a bid to undermine this venture and re-obtain  
19 the rights to Stolichnaya, was seeking to flood the  
20 market with knockoff versions of the brand.

21 "I know that as a result this businessman, whose  
22 name I do not remember, hired RISC to look into the  
23 origins of this knockoff brand within Russia and  
24 identify where it was being produced and shipped from  
25 and to for worldwide distribution. This guy would never



1           have contacted me directly. This would have come to  
2           Keith Hunter, the MD of RISC, who would have fed it down  
3           to Cliff Knuckey, my boss, and it would have come to me  
4           from Cliff.

5           "This was what I was working on and what I was  
6           running Alexander Litvinenko for. This had been set up  
7           as his project from before I had begun to work at RISC  
8           and while he was still being handled by Garym Evans."

9           Is that accurate?

10          A. Yes, sir, that's correct.

11          Q. Going on to 16305, the bottom of that page, you  
12           introduce -- here it's referred to as "Gordievsky", but  
13           we'll break that down. But you're actually referring in  
14           the bottom two lines to the agriculture minister in  
15           Russia.

16          A. Yes, I believe that is my mistake, and I'm responsible  
17           for that.

18          Q. Yes.

19          A. I got the two names confused, but it is the agriculture  
20           minister we're talking about.

21          Q. Indeed, to be fair to you, in your January statement you  
22           do refer to him as Mr Gordeyev. All right?

23          A. Yes, I believe so.

24          Q. What was it that Mr Gordeyev could or couldn't do in  
25           relation to the ongoing primary point of your connection

1 with Mr Litvinenko?

2 A. Well, it was to see whether he was going to be bothered  
3 to pursue the Stolichnaya company and take it through  
4 the courts, or whether they were going to settle or was  
5 there going to be a deal given where they could make it  
6 under licence. They were just exploring all the  
7 options, but they desperately wanted to keep the  
8 Stolichnaya brand outside of Russia and Russia  
9 desperately wanted it back because it is a global brand.

10 Q. Was there any suggestion in this enquiry that  
11 Mr Gordeyev was corrupt or corruptible or both? What  
12 was the point of this?

13 A. The point was to see what kind of man he was and was he  
14 going to -- did he have other political ambitions, was  
15 he going to be there forever, was he going to hunt down  
16 Stolichnaya and make them pay, was he going to put them  
17 out of business, or was he not really bothered. It was  
18 business intelligence to find out how the land was lying  
19 and what they'd have to do.

20 Q. At the initial meeting, the first meeting, what if  
21 anything was said to you by Mr Litvinenko as to his  
22 capacity, his ability to provide answers as to the  
23 Gordeyev questions?

24 A. He said he was very well connected and he had contacts  
25 in Russia and he would be able to make enquiries.

1 Q. Did he elaborate as to the nature -- I don't want names,  
2 but the status of his contacts, he said "well  
3 connected", that can mean a lot of things, can't it? On  
4 this issue, in terms of a Russian state minister, what  
5 was his position?

6 A. He just said he had people who would know.

7 Q. We'll follow that project through and the introduction  
8 of others to help with it. Was that the only work that  
9 he was doing that was being handled by you or were there  
10 other enquiries?

11 A. That was the only work he had been tasked with.

12 Q. All right, what else was he doing, then, Mr Quirke,  
13 between your first introduction and his death?

14 A. He came back to us with things that he thought would  
15 interest us on people that he thought were interesting.  
16 I think it was to try and show the quality of the  
17 information he could obtain, even though it wasn't  
18 relevant.

19 Q. Outside the Gordeyev/Stolichnaya tasking, what  
20 information in broad terms did he come back with and  
21 what was its quality?

22 A. He provided a disk and the information on the disk  
23 turned out to have been -- the term was used in the  
24 office "culled" from Russian internet sources and was  
25 pretty poor quality. He was embarrassed by that because

1 he'd been told it was very good quality information. It  
2 was about three months out of date. Interesting, but  
3 not relevant.

4 Q. Out of date and, secondly, apparently based on Russian  
5 open source material?

6 A. Some of it was, it was given to a Russian contractor,  
7 who worked for us, a translator.

8 Q. Namely?

9 A. Patrick Jost.

10 Q. Jost, yes.

11 A. Patrick speaks fluent Russian, obviously, and very  
12 politically aware, he'd gone through it all and he'd  
13 read some of it before, he looked some of it up and seen  
14 where it was, and basically, he came back with a report  
15 saying that it wasn't what it purported to be. Ie new  
16 information.

17 Q. Did you give that CD-ROM to the police subsequently?

18 A. I believe so, yes to that.

19 Q. Was the assessment of your company that whilst out of  
20 date, that anything in terms of the source of the  
21 intelligence was other than really open source material  
22 collated by somebody?

23 A. The -- Cliff Knuckey was of the opinion that it was  
24 totally open source and was very unhappy about it.

25 Q. Was he paid for that?

1 A. Yes, he was.

2 Q. Do you know how much Mr Litvinenko was paid for that  
3 disk?

4 A. From memory I believe he wanted USD 10,000 and he was  
5 paid USD 7,500.

6 Q. Are you sure that was to Mr Litvinenko?

7 A. No, that's to Mr Lugovoy, Mr Lugovoy.

8 Q. Okay. I'll come back to that. So far as you are  
9 concerned, in the period that you knew him, what  
10 payments were made to Mr Litvinenko in connection with  
11 any of his work?

12 A. I can't remember, I'm afraid.

13 Q. I'm slightly tiring of asking this, but would there be  
14 any records of the payments or the form of payments?

15 A. The original payments would have been before my time, so  
16 I've no knowledge of them and I don't know -- nobody was  
17 made to sign for money because it would have left an  
18 audit trail and put names on paper, so, no, it would  
19 have been a cash payment somehow.

20 Q. Who would have been responsible physically for handing  
21 him the cash payment?

22 A. Well, possibly Garym Evans, possibly the company  
23 accountant may have had instructions to send it  
24 somewhere.

25 Q. Did you ever hand over money to him for his work?

1 A. I don't believe so, no. I only remember the phone  
2 cards.

3 Q. INQ002841, please. Could we have from "I would  
4 describe" down to "Garym Evans to Litvinenko", about six  
5 lines highlighted, please. Thank you:

6 "I would describe Alexander as inexperienced in  
7 business matters. He didn't know what people wanted in  
8 terms of information, he didn't know the value or price  
9 of such information or what could be sold."

10 Do you stand by that?

11 A. Yes.

12 Q. "I only know of two payments of monies from this company  
13 to Alexander. One was in April or May 2006 and the  
14 other in September 2006. I have no knowledge of any  
15 payments made by Garym Evans to Litvinenko."

16 So on the face of it, Mr Quirke, I'm not trying to  
17 catch you out --

18 A. No, of course.

19 Q. -- but on the face of it, there are payments  
20 in April/May, and again in September 2006.

21 A. Yes, I think the one I was confused about  
22 was September 2006, which I've mentioned. The other one  
23 I can't recall, to be honest.

24 Q. You have mentioned a payment of USD 7,500 down from 10,  
25 but that was actually to Mr Lugovoy, wasn't it?

1 A. Yes.

2 Q. Doing the best you can -- and this is a statement of  
3 4 January 2007 -- doing the best you can from memory,  
4 these two payments which appear to be concurrent with  
5 the period you had direct handling responsibilities for  
6 him, what is the quantum of payment and what was the  
7 form of payment?

8 A. Can you say that again?

9 Q. How much and how was it handed over?

10 A. I can only remember the second payment, and that was  
11 a bank transfer, I believe to Cyprus, that's September,  
12 I believe, and the other payment, I just can't remember  
13 it at all. I don't remember handing anybody cash.

14 Q. We'll come back to payments in the context of Mr Lugovoy  
15 and try and disentangle it later. Did there come  
16 a point where another individual was introduced by  
17 Mr Litvinenko to promote his role and the investigations  
18 you were continuing?

19 A. Yes, there did.

20 Q. When did that point arise, Mr Quirke?

21 A. Well, it was Mr Lugovoy and he brought him to a meeting  
22 at RISC Management, I can't remember the exact date, in  
23 2006.

24 Q. Your January statement, 2839, reads:

25 "The next time I recall meeting Alexander was here

1           when he attended with a man called Andrei. I now know  
2           this is Andrei Lugovoy. This was April or May 2006."

3    A. Yes, that's correct.

4    Q. "I cannot be sure of the date, but it would be a few  
5           days before the date of the wire transfer to Cyprus."

6           All right?

7    A. Yes.

8    Q. You go on to relate who was the recipient of the wire  
9           transfer to Cyprus, but does that help with you the date  
10          of the meeting?

11   A. End of April/beginning of May, yes. I couldn't put  
12          a specific date on it, no, I've got no record of it.

13   Q. What had Mr Litvinenko said to you as to Mr Lugovoy  
14          before he attended this meeting at Cavendish Place?

15   A. That he was going to bring someone up to meet us that he  
16          trusted and who was in Russia and could help us.

17   Q. Did you ask for any other information about this person  
18          that was being introduced?

19   A. I took it on face value, that he knew his sources and  
20          I had to respect that, so he brought him up. He told me  
21          he'd worked with him before in the FSB.

22   Q. Beyond what you've said, did Mr Litvinenko say anything  
23          more about the background of Mr Lugovoy, his assessment  
24          of Mr Lugovoy, the nature of their relationship?

25   A. He said he trusted him.



1 Q. Trusted him?

2 A. Yes. He had his own business in Moscow as well.

3 Q. The reported nature of Mr Lugovoy's business in Russia?

4 A. It was mainly private security, but there was an  
5 intelligence element to it as well.

6 Q. Did this meeting in April or May 2006, which you say was  
7 a few days before the date of the wire transfer of funds  
8 to Cyprus, had Mr Lugovoy already played a part in  
9 providing intelligence to you?

10 A. Not that I was aware of, no.

11 Q. Can you just reflect on that? Had he played any part in  
12 it by then? I'm trying to get into the subject matter  
13 of this very specific meeting in April. Who else was  
14 present? You, Mr Lugovoy, Mr Litvinenko. Anybody else?

15 A. Mr Knuckey.

16 Q. Mr Knuckey? Did he stay for the whole meeting?

17 A. I don't think so.

18 Q. Just reflect on whether the meeting followed you being  
19 provided with information or simply set it up, just  
20 think about that, and who was being paid or demanding  
21 payment?

22 A. Mr Lugovoy was the person who wanted payment.

23 Q. What for?

24 A. I believe it was some information on the Stolichnaya --  
25 it was either Stolichnaya and/or the disk, I'm not quite

1           sure.

2   Q.   I'm going to put it on screen and then ask for your  
3        comments on it.  INQ002839, please.  Final paragraph.  
4        You've already covered the date, arranged over the  
5        phone.

6                "We had a meeting in the boardroom and Cliff Knuckey  
7        was present.  Alexander had been tasked with obtaining  
8        some information.  He had come back with Andrei, who had  
9        obtained some of this information."

10               This is Andrei Lugovoy.

11   A.   It is, yes.

12   Q.   "Andrei wanted paying for this information but it was  
13        not up to the standard we expected.  The information  
14        appeared to have been culled from Russian internet  
15        sites.  Being in Russian it made it difficult to assess  
16        what we were being sold.  We had an exchange of views  
17        about the quality of the information.  Andrei wanted  
18        USD 10,000 for the information but Cliff was not  
19        prepared to pay that much for it.  Cliff Knuckey agreed  
20        to pay them USD 7,500 for it.  This payment was for the  
21        information provided and in recognition of ... other  
22        work Alexander had done for us such as identifying some  
23        individuals, detailed the structures of some  
24        organisations for us.  We wanted to cultivate and build  
25        this relationship.  They were told to go away and get

1 further information."

2 The next paragraph as well, please, down to

3 "Andrei's Russian company and us":

4 "That payment of USD 7,500 was made to an account  
5 operated by Andrei in Cyprus. I have given the account  
6 details to the police. The payment was made by means of  
7 wire transfer within a few days of the meeting."

8 Pausing there, Mr Quirke, does that help as to the  
9 wire transfer and who the recipient was with an account  
10 in Cyprus?

11 A. Yes, it does, yes.

12 Q. Who was it?

13 A. Mr Lugovoy.

14 Q. Go back to my previous questions: can you help, if the  
15 Cypriot wire transfer is to Mr Lugovoy, with how -- is  
16 there a different payment to Mr Litvinenko  
17 in April/May 2006?

18 A. There may well have been. This one was to Mr Lugovoy.

19 Q. Were you responsible for doing that?

20 A. No.

21 Q. How did you know the account details, then, to give them  
22 to the police?

23 A. Well, as I said, there was an exchange of views.

24 Q. Between who?

25 A. The group. Mr Lugovoy demanded his USD 10,000.

1 Mr Knuckey told him he wasn't going to get it, it was as  
2 simple as that. They told him that the information  
3 wasn't up to proof. However, he still wanted to carry  
4 on the relationship with Mr Litvinenko. So a compromise  
5 was arranged. He told them they'd get 7,500, and that's  
6 when -- he wasn't happy about it, Mr Lugovoy, but he  
7 gave the details and he took the money.

8 Q. This was a distinct report, I interpret, than anything  
9 on the CD-ROM which is separate which was handed to you  
10 at the end of the meeting?

11 A. Yes.

12 Q. We'll come on to that. So this does not relate to the  
13 information on the CD-ROM.

14 A. No.

15 Q. Did it relate to the Gordeyev vodka enquiry?

16 A. From memory, I believe so.

17 Q. Was that enquiry ongoing?

18 A. That enquiry had been started long before I got there  
19 and was still going on well after I left, I believe.

20 Q. "The information that they handed over was a document  
21 detailing the current structure, internal security  
22 measures, persons in significant positions and current  
23 set-up of Russian organisations mainly concentrating on  
24 the FSB."

25 A. Yes.

1 Q. "This document was of no further use to us and has been  
2 destroyed."  
3 A. That's correct, it wasn't requested and it wasn't  
4 relevant.  
5 Q. In that you've just told us the Gordeyev enquiry was  
6 ongoing --  
7 A. Yes, sir.  
8 Q. -- and it related to that, and you're giving a statement  
9 on 4 January 2007, even by then you'd destroyed the  
10 documentation you'd been handed in this sense?  
11 A. In this sense, the document -- to recollection, I gave  
12 the document to Cliff Knuckey who examined it and said  
13 it was rubbish, and we looked at it and he kept it and  
14 it was destroyed.  
15 Q. Accordingly, it wasn't available to hand to the police?  
16 A. No.  
17 Q. You'd gone on to say:  
18 "I remember that there was a female interpreter  
19 present at the meeting. [it] was to formalise the  
20 relationship between Andrei's Russian company and us."  
21 A. Yes, sir.  
22 Q. Before we come on to further meetings, it's at that  
23 point you're handed the CD-ROMs, and your statement  
24 continues, and we've covered that, which was available  
25 to the police?

1 A. Yes, that was given to the police.

2 Q. Is there a reason why you kept the CD-ROM and not the  
3 other document?

4 A. I think some of the stuff on the CD-ROM was relevant.

5 Q. In the context of the vodka enquiry, was one of the  
6 aspects that had been talked about on one occasion  
7 something called "greenmail"?

8 A. It was spoken about, yes.

9 Q. Can you remember at which of your meetings it was that  
10 greenmail was discussed?

11 A. I believe that was the second meeting with Alexander  
12 Litvinenko.

13 Q. Who else was present when greenmail -- I'll come on to  
14 your definition of it in a moment, but was it  
15 the April/May meeting or another meeting? How many  
16 meetings do you now believe took place?

17 A. Between who?

18 Q. Between you, Mr Litvinenko and Mr Lugovoy in particular.

19 A. Definitely two meetings. There was possibly a third  
20 where they just dropped in and basically had a coffee  
21 while they were doing other stuff in the area. That's  
22 what's given me a bit of confusion, but there were two  
23 formal arranged meetings.

24 Q. Right, and insofar as greenmail was introduced, was that  
25 a concept that was introduced at one of these meetings?

1 A. Yes, it was.

2 Q. And the first or the second of them?

3 A. Whatever I've said in my statement. I can't remember  
4 offhand.

5 Q. It appears to be a reference to the second, but we'll  
6 come on to the detail in due course.

7 A. I think that would be right. I had never heard of the  
8 expression before either, which surprised me.

9 Q. As to the second meeting involving the three of you, are  
10 you able to put a date on the second meeting, what you  
11 now say is the second meeting? If you look at --

12 A. I believe that would be 17 October 2006, would be the  
13 second meeting.

14 Q. In your initial statement, you referred to this as the  
15 third proper meeting.

16 A. There had been three meetings between us, but there had  
17 only been two doing basically business. The other one,  
18 as I say, was they were passing by and they called in.  
19 I'm almost sure of it, because I definitely remember  
20 them just being about, we didn't do anything, they had  
21 a coffee and they left.

22 Q. So there was effectively an insubstantial meeting at  
23 some point?

24 A. It was "hello, how are you, we're doing what we can,  
25 we'll get back to you" sort of meeting.

1 Q. What had they been instructed to do in April/May before  
2 you saw them again at a substantive meeting on  
3 17 October 2006?

4 A. It was to obtain all the information they could about  
5 Gordeyev, his associates and the agriculture ministry  
6 and any ongoing law -- legal matters they intended to  
7 put against Stolichnaya in Cyprus.

8 Q. Had the basis on which they were going to be paid been  
9 discussed at the end of April/May?

10 A. No, I think the figure in the end came from them that  
11 they wanted 10,000, they wanted it, but everything  
12 seemed to revolve around 10,000, so it was a bit ...

13 Q. They or one of them had wanted 10,000 for the  
14 intelligence they'd already provided by April/May? I'm  
15 asking about on the basis on which any discussion took  
16 place for future payments for future intelligence?

17 A. I don't believe -- it was payment by reward, if the  
18 information was quality, they would be paid well for it.  
19 If it wasn't, bearing in mind the first disagreement,  
20 they weren't going to get anything.

21 Q. So nothing was discussed upfront?

22 A. No, they were aware of the information, if it was good  
23 quality, they could demand good money for it. So they  
24 would do that, and they wouldn't tie themselves down to  
25 a lower price before they'd produced anything.



1 Q. What sort of figures are we talking about for really  
2 good intelligence on an operation like this?

3 A. It depends on the information. I don't know. They  
4 seemed to have a figure that they should be paid so much  
5 per day, per whatever they produced, and that was it.  
6 We decided that we wanted quality information as had  
7 been tasked. I think they would have probably got  
8 10,000, 20,000 and there probably would have been  
9 follow-up work from it. So if they were sensible, it  
10 would be an income stream.

11 Q. Did you make further payments to either of them in  
12 connection with their work?

13 A. No.

14 Q. How was the meeting of the 17th arranged and where did  
15 it take place?

16 A. It was arranged on the phone, a phone call in to me, and  
17 it was held at RISC's headquarters in Cavendish Place.

18 Q. Who made the call to you?

19 A. Mr Litvinenko.

20 Q. Who appeared to be doing the work in connection with  
21 these enquiries as between the two of them?

22 A. Between Mr Litvinenko and Mr Lugovoy?

23 Q. Yes.

24 A. Hard to say, but Mr Lugovoy was in Russia, I presumed he  
25 was taking a lead role in it.

1 Q. At 2842 of your first statement, you've actually said  
2 that you've given a paper copy of the report "they  
3 handed us" to the police.

4 A. I believe so, yes.

5 Q. So the police can produce that if necessary.

6 A. Yes.

7 Q. How long before the 17th was it that Mr Litvinenko rang  
8 you to arrange this meeting of the 17th?

9 A. (Pause)

10 I'm not sure.

11 Q. All right, let's jog your memory. INQ002842. If you  
12 could pick it up, please on "the third proper meeting"  
13 down to "4.00 pm". Just refresh your memory from this.  
14 This is your memory in January 2007:

15 "The third proper meeting ..."

16 You clarify this later to mean the second.

17 "... was on 17 October ... Alexander had phoned me  
18 to arrange a meeting. Due to the nature of the meeting  
19 it required the presence of both myself and  
20 Cliff Knuckey, who had a full diary. Cliff Knuckey had  
21 to be present as only he is authorised, as head of the  
22 company, to agree to large payments for information."

23 A. That's correct.

24 Q. "It was subsequently arranged to be on 17 October ...  
25 I do not know the date Alexander phoned me, but it was

1           about two weeks before the 17th."

2    A.   That would be roughly about that, yes.

3    Q.   "Both Cliff and myself were away between the phone call  
4           and 17 October 2006."

5    A.   Yes, we were.

6    Q.   "On 17 October 2006, Alexander and Andrei arrived with  
7           a third man who I had never seen before.  The meeting  
8           was supposed to have taken place early in the afternoon  
9           but I received a call from Alexander telling me they  
10          were running late.  I also recall a second phone call  
11          from Alexander stating that they were at a meeting that  
12          had overrun and they would be delayed further.  He asked  
13          to delay the meeting for about 45 minutes.  Eventually  
14          the three men arrived at about 4.00 pm."

15   A.   That's correct.

16   Q.   Can we take it there's no formal diary entry for you at  
17          the time of this?

18   A.   There's no formal diary entry, no.

19   Q.   But on the other hand you're giving this account  
20          in January of 2007.  Who were you expecting to attend at  
21          that meeting, Mr Quirke, and who did attend?

22   A.   Mr Litvinenko and Mr Lugovoy.  A third person turned up  
23          with them.

24   Q.   Do you know the name of the third person?

25   A.   He was introduced to me as Mr Kovtun.

1 Q. He was introduced to you as that?

2 A. Yes.

3 Q. Had you met him before?

4 A. I'd never met him. I'd never heard of him before, and I  
5 wasn't expecting it.

6 Q. Can you describe his appearance?

7 A. He was quite -- well, about 5'8", 5'9", between 5'8" and  
8 10, a medium to slight build and he had a black suit,  
9 black shoes, a black shirt and slicked-back black hair  
10 and he had a bag with him, a small bag.

11 Q. INQ002844. "I would describe the third man", that  
12 paragraph, please, and just down to "on the mini-disk  
13 was", just end there, two lines down, please. We'll  
14 come on to the mini-disk. This is your account  
15 in January of this third man:

16 "I would describe the third man as his age in his  
17 40s. He had jet-black thick hair, which looked like it  
18 had been greased or gelled up. He had dark skin of an  
19 almost Mediterranean appearance. He was of stocky build  
20 but not overweight. He was about 5'6 to 5'8 tall ... He  
21 spoke a little bit of English and clearly answered to  
22 Andrei.

23 "He was wearing a jet-black suit and black shoes.  
24 I had the impression that he was in charge of the  
25 mini-disk. He knew what every document on the mini-disk

1           was."

2    A.  Yes, sir, that's correct.

3    Q.  Is that an accurate description of --

4    A.  From my recollection of the man when I was asked by the  
5       police, yes.

6    Q.  You remember now he was introduced to you as Kovtun?

7    A.  That's subsequent.  At the time he was introduced to me,  
8       I didn't take much notice of his name because there was  
9       a lot of chatter going on and I was trying to move them  
10      into the boardroom to get them out of the way of other  
11      people who were there.

12   Q.  When you say the name Kovtun is subsequent, it's  
13      subsequent to what?

14   A.  It may well be the first time I heard it was on the  
15      television or when the police came to take a witness  
16      statement, but he was introduced to me, but I can't be  
17      sure what he was introduced as.

18   Q.  Right.  I'll be corrected if I'm wrong, but I'm not sure  
19      in any of your previous statements you've stated that he  
20      was introduced to you by name at all.

21   A.  I think that's because I couldn't remember the name, and  
22      that wasn't included in the statements.

23   Q.  Right.

24   A.  But he was introduced, it would be, you know,  
25      unbelievable that they'd bring a man in and not

1 introduce him. There was a name, but I didn't take much  
2 notice of it at the time.

3 Q. What I'm trying to press you on is because you said he  
4 was introduced as Mr Kovtun; it's not something you put  
5 in the statement before.

6 A. No. I can't say for sure what name was said to me on  
7 that date put to that man.

8 Q. What part did this third man play in the meeting on  
9 17 October?

10 A. He sat down the table, he played with his computer, and  
11 there was information on it he wanted to show us which  
12 was very important, and he -- from what I could see that  
13 was going on, he answered to Mr Lugovoy and I assumed  
14 that he was either employed by him or one of his staff.

15 Q. You've indicated it was at this meeting that the concept  
16 of greenmail was introduced.

17 A. I believe so, yes.

18 Q. I'm just going to put on screen your explanation of  
19 this. It's probably better for us both, I think --

20 A. Yes, it's confusing.

21 Q. INQ002844, the last two lines, please:

22 "One of the aspects of our business that Alexander  
23 and Andrei had spoken about was something called  
24 'greenmail'. I had never heard this expression before."

25 Is this all at the meeting of 17 October?

1 A. Yes.

2 Q. "They explained that it was similar ..."

3 Can we take it down to "Andrei was the businessman  
4 of the two", please, just over halfway:

5 "... similar to blackmail but was a method to force  
6 the price of the company down. They could see that the  
7 company involved in the documents provided to us, based  
8 just outside Moscow, was involved in illegal spirit  
9 production."

10 This is back into the vodka, whole vodka industry  
11 point you're making?

12 A. This is vodka, yes, Stolichnaya.

13 Q. "The company was trading illegally, according to  
14 Alexander and Andrei, and was being protected by the  
15 agriculture minister who was receiving a bribe to do  
16 so."

17 That's Mr Gordeyev, is it?

18 A. That is correct, yes.

19 Q. "If you wanted to remove the company as a problem they  
20 knew people in Russia who would be able to force the  
21 value of the company down. If the value of the company  
22 were forced down, then the amount of bribes the  
23 agriculture minister could extract would also be reduced  
24 as he was on a percentage. They said that 'greenmail'  
25 could be applied where services to the company didn't

1           happen, deliveries didn't take place, and their  
2           transport system didn't work. As a result, the company  
3           couldn't function properly.

4           "I told them that that was a matter for whoever  
5           bought the information and a later meeting. They  
6           explained it was a common practice in Russia to  
7           undermine the trading of a company to destroy its value.  
8           We left this aspect at that point."

9           Is that an accurate summary of the conversation as  
10          to greenmail?

11        A. It is, yes.

12        Q. You've used there the word "they" in terms of who was  
13          describing the potential use of greenmail as part of the  
14          enquiry.

15        A. Yes.

16        Q. Who is the "they", just so it's absolutely clear?

17        A. Mr Lugovoy and Mr Litvinenko, and Mr Litvinenko was  
18          doing the translating.

19        Q. Right. So translation is one thing, but which of the  
20          men present, Litvinenko, Lugovoy and Kovtun, which of  
21          the men present was describing to you this as  
22          a strategic option for your client?

23        A. Mr Lugovoy.

24        Q. Did Mr Litvinenko make any comment on this as  
25          a strategic option?



1 A. He did the translation and we didn't really go there.

2 Q. So far as you are aware, was greenmail used as  
3 a strategic option subsequently as part of this enquiry?

4 A. No, it wasn't.

5 Q. You do say that:

6 "The matter of greenmail had never been spoken about  
7 with Alexander initially. I believe Andrei raised it."

8 A. I believe that to be true, yes.

9 Q. How did that meeting conclude, then, in terms of this  
10 project, future payments, and anything else?

11 A. I think Mr Lugovoy was coming back to the UK at a later  
12 date and the project would be picked up then.

13 Q. Did there come a point where the man we believe to be  
14 Mr Kovtun, acting really at the direction of Mr Lugovoy,  
15 gave you a mini-disk of some sort?

16 A. He gave me a mini-disk, yes, he did.

17 Q. What was the context in which that happened?

18 A. Mr Lugovoy was explaining the business services he could  
19 provide and he said there was stuff, interesting stuff,  
20 on the disk through Alexander Litvinenko who had done  
21 a translation, and they were trying to get it to work,  
22 and it didn't work.

23 Q. Was it made to work in your presence?

24 A. I think so, yes, basically parts of it.

25 Q. Did you retain that mini-disk?

1 A. Yes, I did.

2 Q. Did you retain a code to the mini-disk they had given  
3 you?

4 A. There was a code written on the back of the disk,  
5 I believe.

6 Q. Did you provide that mini-disk to the police in due  
7 course?

8 A. Yes, I did.

9 Q. In terms of being more precise as to timing, on the  
10 17th, 002843, please. The paragraph starting "whilst  
11 the computer opened up the documents", thank you very  
12 much.

13 I think you're describing here where your laptop has  
14 ultimately been used to open this mini-disk?

15 A. Yes, they couldn't get it, so I went out and brought in  
16 a laptop.

17 Q. But you go on to say that the third man who was  
18 operating the computer was stabbing away at the buttons  
19 to do it?

20 A. Yes.

21 Q. Then you've added:

22 "Whilst this was going on, Andrei received a text  
23 message or an alert on his phone and he said to me 'one  
24 nil'."

25 A. Yes.

1 Q. "This related to a football match in Moscow between  
2 CSKA ... against Arsenal. There was only one goal  
3 scored in the match and I know it was in the 24th minute  
4 of the game. His phone only went off once. I think the  
5 message was sent shortly after the goal as opposed to  
6 after the match finished. Andrei appeared happy ..."

7 A. Yes, he was.

8 Q. If that was at or about the 24th minute of the game, and  
9 the game kicked off at 5.30, that would take us to 5.54,  
10 wouldn't it?

11 A. Yes, I believe so.

12 Q. How long do you estimate -- those will be facts that  
13 could be established from other sources.

14 A. Yes.

15 Q. But how long do you estimate this meeting took that  
16 appears to have been taking place --

17 A. 50 to 55 minutes, under an hour.

18 Q. Right. So what time do you estimate it finished, if  
19 that's a text message received?

20 A. Shortly before 5.00, and they were anxious to get away  
21 to another meeting.

22 Q. You've no record of the time in your diary for when it  
23 actually took place, this meeting?

24 A. I didn't have a diary, I didn't record any times.

25 Q. How did you know in January 2007 that the single goal in

1           that game, one nil to CSKA in the end, was in the 24th  
2           minute?

3    A.   I think I looked it up.

4    Q.   Looked it up where?

5    A.   On the internet.

6    Q.   For the purpose of your statement?

7    A.   Yes, and that's the confusion, where there's this other  
8           meeting in between those two meetings, I believe  
9           Mr Lugovoy was over for a football match at Arsenal, and  
10          that's why they popped in. He was going on killing  
11          time, going on to the football match. This may or may  
12          not have been the second leg of it, I'm not sure. But  
13          he was getting -- he was into football and he was into  
14          CSKA Moscow. So --

15   Q.   So you believe on that meeting, he was going on  
16          eventually that day to the Emirates to watch the  
17          Arsenal-CSK return leg?

18   A.   I believe so, yes. The only thing he ever said to me  
19          was about football, in English.

20   Q.   Was money discussed in terms of Mr Litvinenko at that  
21          meeting, 17 October?

22   A.   Yes.

23   Q.   What was said?

24   A.   He wanted some payment to cover his expenses.

25   Q.   What level of payment was he asking for to cover

1 expenses? (Pause)

2 Well, let me help, INQ002845:

3 "At one point, Alexander had discussed with me if it  
4 would be possible for me to pay him USD 2,500 out of the  
5 USD 10,000 here in the UK, but this was never proceeded  
6 with and all of the money was paid to Andrei's company  
7 in Cyprus. From this I believe Alexander was on  
8 a percentage of about 25 per cent but it was a matter  
9 between them. Andrei was the businessman of the two."

10 A. Yes, sir, I believe that's true.

11 Q. Beyond that statement -- is that accurate?

12 A. That's accurate, yes.

13 Q. Beyond that statement, did you get involved in how those  
14 two men were arranging respective payments?

15 A. No, it's supposition on my part, him wanting 2,500 of  
16 the 10,000, that was his payment and he wanted to secure  
17 his payment.

18 Q. Beyond his role with the mini-disk, did Mr Kovtun, if it  
19 was him, play any further part in that meeting in  
20 practical terms?

21 A. No.

22 Q. Did anybody explain to you his background, his purpose  
23 in being present, his future role?

24 A. I believe he worked for Mr Lugovoy and he was ex-FSB as  
25 well.

1 Q. Who told you that?

2 A. I think Mr Litvinenko through Mr Lugovoy, they just  
3 said, you know, he's the same as us, his background.

4 Q. You've already started to relate a further meeting on  
5 the occasion of the return football leg, it would seem,  
6 with Mr Lugovoy. Who else was present at that further  
7 somewhat chance meeting?

8 A. They just came up in the lift, I think I received  
9 a phone call --

10 Q. Who's "they"?

11 A. Mr Lugovoy and Mr Litvinenko. They came up, said hello,  
12 a quick brief chat, I offered them a coffee in the  
13 kitchen, they said "yes", sat down and just chatted  
14 about generalities, and then they got up and left.

15 Q. Was that the last time you saw them together?

16 A. No, the next time I saw them together was the meeting  
17 we're talking about now where they wanted payment.

18 Q. How did these two men appear to get on? We'll come back  
19 to it, and maybe it will be we'll have a break after  
20 this, how did they appear to get on as individuals,  
21 Mr Lugovoy and Mr Litvinenko?

22 A. Very well.

23 Q. Did Mr Litvinenko ever express any concerns about  
24 Mr Lugovoy to you?

25 A. No, he said he was a friend and that he could be

1           trusted, and I don't think he would have been there if  
2           he didn't trust him.

3 MR DAVIES:  Sir, I'm going to go on now.  We are on time.  
4           It may not feel like it, but we are on time.  We're  
5           going to go on to events in early November 2006.

6 THE CHAIRMAN:  Yes, very well.  2.00.

7           (12.55 pm)

8   (The short adjournment)

9           (2.00 pm)

10 THE CHAIRMAN:  Yes, Mr Davies.

11 MR DAVIES:  Mr Quirke, we are coming to the end of your  
12           narrative account and I'd just like you to pick up,  
13           please, on what if any further arrangements were made  
14           after the 17 October meeting, to meet again, for what  
15           purpose?

16 A.  Basically, when he had information, they were going to  
17           contact us, and we were going to make the arrangements  
18           then and come into the office again.

19 Q.  Did anybody contact you for that purpose?

20 A.  No.  Well, subsequently Mr Litvinenko contacted me.

21 Q.  Yes, let's deal with that.  After the meeting of  
22           17 October, did he contact you again?

23 A.  He contacted me on the phone, yes.

24 Q.  And reported what?

25 A.  That he wasn't very well.

1 Q. Let's go back a step. Look at your page 002845, please.  
2 Sorry to take it like this, Mr Quirke, because although  
3 almost certainly uncontentious, it's important we have  
4 your account of how events developed.

5 A. Certainly.

6 Q. If you look at the lower quarter, please, of 2845, you  
7 seem to be relating a conversation with Mr Litvinenko  
8 shortly after 17 October.

9 A. He had basically come back to see me when Andrei Lugovoy  
10 came back to the UK, and that had to be determined.

11 Q. Let me just remind you of what you said.

12 "When I spoke to Alexander shortly after 17 October,  
13 he told me that it was arranged that Andrei would be  
14 coming back to the UK. We would have a meeting as they  
15 had a plan and they would bring an interpreter. He  
16 initially said that Andrei would be back in about 7 to  
17 10 days. I spoke to Cliff Knuckey and found out that  
18 due to other work each of us was away on business and  
19 the next meeting was put back for a few days."

20 A. Yes.

21 Q. "I believe had not yet arranged a buyer for the  
22 material. Cliff was to be present."

23 All right?

24 A. Yes.

25 Q. "As a result the next meeting would have to be when



1           Cliff Knuckey and I could attend. He felt that  
2           Alexander and Andrei were getting ahead of themselves.  
3           I received one or two calls from Alexander when I was  
4           away in France. I went to Marseille on 25 October 2006  
5           unrelated to Mr Litvinenko."

6   A. Yes, sir, that's correct.

7   Q. When were you in France?

8   A. Oh, I spent about five weeks in France in all, so it was  
9           various periods. I was commuting back and forwards to  
10          London.

11   Q. You said "I went to Marseille on 25 October". Can you  
12          indicate the dates of travel now or not?

13   A. No, it was over a protracted amount with a problem that  
14          was being dealt with out there, security issues.

15   Q. Can we take it there was no meeting with Mr Litvinenko  
16          and Mr Lugovoy on that date?

17   A. There was no meeting, no.

18   Q. What was the next communication with them, then?

19   A. On or about 1 November 2006, Mr Litvinenko phoned me.

20   Q. Yes, and what was the -- what did he report to you?

21   A. He said that he could not come to a meeting as he had  
22          diarrhoea -- he'd had diarrhoea all night and that he'd  
23          begun vomiting and he was very unwell.

24   Q. Can you recall at what time of day you spoke to him?

25   A. It would be some time in the afternoon, early afternoon.

1 Q. Did he tell you he was in hospital?

2 A. No, I don't believe so.

3 Q. How did he sound?

4 A. Not very good. He sounded strained.

5 Q. In your various meetings, chance, arranged or otherwise

6 with him, had you ever seen him drink alcohol?

7 A. No, he didn't drink alcohol, no.

8 Q. In terms of what he did drink, what had you observed

9 that he did drink?

10 A. He liked coffee, he'd drink water, and he'd drink tea.

11 Q. How would he take his tea?

12 A. I believe white, no sugar, though if it was herbal teas

13 he might have a black tea.

14 Q. You've put in your statement:

15 "I would say he looked fit and healthy. I noted

16 that he nearly always drank tea with a small bit of

17 milk. He did not always drink it as he just wanted to

18 be polite with hospitality."

19 A. Yes, I believe so, yes.

20 Q. Did you in fact after that telephone call indicating

21 from him that he was ill, and you said he sounded ill,

22 did you in fact meet or speak to him again?

23 A. No, I did not.

24 Q. Did you receive any further communication from or on

25 behalf of Andrei Lugovoy?

1 A. Yes, I did.

2 Q. When was that and who was it?

3 A. I think after the events broke in the media, I received  
4 a call from Mr Lugovoy's secretary.

5 Q. Do you have her name?

6 A. Angelina, I believe, yes, Angelina.

7 Q. What did she say?

8 A. She spoke very good English and she was enquiring as to  
9 events basically, she was trying to find out what was  
10 going on.

11 Q. Did she say anything in connection with Mr Lugovoy?

12 A. That he wasn't available at the time.

13 Q. Right. What about anything said in relation to the  
14 British embassy?

15 A. She said that he would go down to the British embassy  
16 and make a statement if he was required to.

17 Q. What was she asking you for if anything?

18 A. She was just wanting to know what was going on, had we  
19 been approached by the police, had they visited us.

20 Q. How did you interpret that enquiry?

21 A. I think they were trying to gain intelligence as to the  
22 situation, to see what the damage was to them.

23 Q. To see what the damage was to them?

24 A. Well, what are the police -- what have the police said  
25 in relation to their enquiries, what have we picked up

1           that the police may have said, what do we think is going  
2           on, basically, to try and get a firsthand account of  
3           what was happening in London.

4   Q.   Was enquiry made as to whether the police had talked to  
5           you directly?

6   A.   I think it was mentioned that the police had been there,  
7           and I'd been spoken to, yes.

8   Q.   Was Angelina making enquiry of what you'd said to the  
9           police?

10  A.   She tried to, but she didn't get very far.

11  Q.   She did try to?

12  A.   Yes.

13  Q.   I think you've been given a photocopy of a business card  
14           that Mr Lugovoy had given you and the numbers didn't  
15           work.

16  A.   No, that's right, it panned out they didn't connect.

17  Q.   Did you try and send any documents back to Russia to  
18           Angelina?

19  A.   I think we tried to send an email and it bounced back,  
20           and we tried to phone the number and it was not  
21           recognised.

22  Q.   What was it you were trying to send to Mr Lugovoy  
23           through his secretary, Angelina?

24  A.   I was trying to find out if the numbers were real.

25  Q.   Did you try and send them anything?

1 A. I think it was just a test email to confirm that that  
2 was their address and that we'd got it.

3 Q. According to your statement, Mr Quirke:  
4 "I printed off three documents speculating about  
5 Andrei being a suspect for murdering Alexander and tried  
6 to contact her again without success."

7 A. Yes, that was subsequent to the phone call.

8 Q. Yes. Those numbers didn't work. Did you receive  
9 a further communication from her?

10 A. Yes, I believe so.

11 Q. When was that?

12 A. I'm not sure of the date.

13 Q. All right. 2848 of your statement, the paragraph  
14 starting:  
15 "A few days later ..."  
16 Does that help you?

17 A. Not really with the date. It's just a few days.  
18 Probably a Tuesday or Wednesday.

19 Q. What happened in the phone call? Who was party to the  
20 phone call?

21 A. It was Angelina again. There was obviously someone in  
22 the background, a male voice.

23 Q. What was said by Angelina to you about in particular the  
24 British embassy visit?

25 A. She explained that she was Andrei's secretary and

1 I explained the contact numbers and address she had  
2 given to me were wrong and didn't work, and this was why  
3 I had not contacted them. She stated that things had  
4 moved on and that Mr Lugovoy had not visited the British  
5 embassy yet, but was going now, and that lots of things  
6 had been said about him and they were concerned about  
7 what was being said in the media.

8 Q. Did she give you two telephone numbers respectively for  
9 Andrei ending 04 and for her ending 02?

10 A. Yes, sir, she did.

11 Q. Or the other way round?

12 A. The other way, yes.

13 Q. You made a note of them?

14 A. Yes, I did.

15 Q. You handed that note to the police?

16 A. The police have those, yes.

17 Q. What did you say back to her?

18 A. Just that I was sorry that Mr Lugovoy had lost his  
19 friend and for her to give my regards to him because he  
20 apparently wasn't in the office. I told her I knew he  
21 would be upset.

22 Q. Did you believe he would be upset, he, Lugovoy, would be  
23 upset?

24 A. At that time I didn't know what to think because he had  
25 been introduced as a friend and a trusted friend and

1           subsequently things had changed and he seemed to be more  
2           concerned with finding out what was going on than being  
3           concerned. You know, why didn't he speak to me direct  
4           and why did the phone numbers and other numbers not pan  
5           out? You wouldn't do that if you were concerned; you'd  
6           make sure someone would have the right number.

7   Q.   How was it left at the end of the call in terms of the  
8           British embassy and his visit there, you made a note of  
9           it?

10  A.   He said he wasn't going to go and that was it.

11  Q.   He wasn't going to go?

12  A.   No.

13  Q.   Just reflect on that, Mr Quirke, if you would. 2848 of  
14           your statement. I don't wish to appear to be  
15           cross-examining you, but this isn't meant to be a test  
16           of memory.

17  A.   No, no.

18  Q.   "She repeated that Andrei ..."

19           About eight lines up from the bottom of the page.

20           Can we have it on screen? INQ002848. Eight lines  
21           up from the bottom?

22  A.   She repeated that he was going to go to the British  
23           embassy.

24  Q.   "She repeated that Andrei was to go to the British  
25           embassy..."

1 A. And that various accusations had been made against  
2 Mr Lugovoy and he would set them straight, yes.

3 Q. Yes:

4 "It was a short call..."

5 A. A very short call.

6 Q. "I had the impression she was being told what to say by  
7 the male in the background."

8 A. There was someone in the background, yes, who was  
9 speaking before she spoke.

10 Q. So far as you can remember, were there any further  
11 communications between you and anyone on behalf of or  
12 Mr Lugovoy himself directly?

13 A. No, I don't believe so.

14 Q. Did you provide or attempt to provide any further  
15 intelligence to Mr Lugovoy?

16 A. I had no further contact with him whatsoever.

17 MR DAVIES: Yes, thank you, Mr Quirke.

18 Questions by MR EMMERSON

19 MR EMMERSON: Mr Quirke, I'm going to ask you one or two  
20 questions, if I may --

21 A. Certainly, sir.

22 Q. -- on behalf of Mrs Litvinenko, and in particular I want  
23 to ask you about that part of the interaction you had  
24 with Mr Litvinenko and Mr Lugovoy that concerned  
25 Mr Gordeyev, the agriculture minister, Alexey Gordeyev,



1           you've mentioned?

2    A.   Yes.

3    Q.   I think it's right you've told us that that area of  
4           information related to the Stolichnaya dispute, is that  
5           correct?

6    A.   That's correct, yes, sir.

7    Q.   I wanted to really go through one passage of your  
8           witness statement in relation to that and in relation to  
9           what it was you were being told about Mr Gordeyev.  
10           Could we look at INQ002841, please. The very last  
11           paragraph beginning:

12                 "The second one ..."

13                 We're going to go down to the end of that and over  
14                 to the following page. This is you referring at this  
15                 point in your witness statement to the second meeting at  
16                 which Mr Lugovoy was present. Do you recall that  
17                 meeting?

18    A.   Yes, sir, yes.

19    Q.   You say:

20                 "The second one was subsequent to that meeting but  
21                 I do not recall the date. It was shortly after the  
22                 first meeting where the disk was handed over and may  
23                 possibly have taken place in May 2006. Alexander  
24                 attended following up on what we had discussed in the  
25                 first meeting and Andrei was with him. Alexander told

1 me they had received the payment ..."

2 Pausing there, that would be the USD 7,500, is that  
3 right?

4 A. Yes, sir.

5 Q. "... and he was happy with this. Alexander had not been  
6 tasked with looking at any specific individual or  
7 organisation in Russia but they were researching  
8 business intelligence around corruption in Russia. This  
9 was to identify whom we could evidence as being corrupt  
10 in Russia."

11 Is that right?

12 A. In relation to Stolichnaya, yes.

13 Q. You say that information was a saleable commodity to  
14 companies and individuals?

15 A. Yes.

16 Q. You say you don't know who would be the receiving  
17 customer, but from what you could see it was Andrei  
18 doing all the work in Russia on this, is that correct?

19 A. I believe so, yes.

20 Q. All of that passage is in connection with information  
21 that you thought would be potentially of value in  
22 relation to the Stolichnaya dispute, is that correct?

23 A. Yes.

24 Q. In essence, in the most general sense, you were being  
25 provided with information on whomever may be corruptly

1 associated without necessarily tasking Mr Litvinenko or  
2 Mr Lugovoy with investigating the particular  
3 individuals. Is that right? Is that correctly  
4 understood?

5 A. That's right. I think any information on corruption  
6 regarding the Stolichnaya case would be useful to the  
7 other side, to the side we were working for.

8 Q. Precisely. So it wasn't you, for example, or your side,  
9 your risk management side, that suggested Mr Gordeyev  
10 might be a fertile source of investigation. That  
11 suggestion came from the Litvinenko/Lugovoy side, is  
12 that right? Or can you not remember that?

13 A. We were aware that he would be the agriculture minister  
14 and he would have to start looking somewhere, so there  
15 was a place to start.

16 Q. Did you know he was corrupt before you were provided  
17 with information by Mr Litvinenko and Mr Lugovoy?

18 A. No.

19 Q. Can we look over the page at 2842, and I think this is  
20 reflected in what you've said here, in just the first  
21 three lines:

22 "The person they identified as being corrupt is  
23 called Gordeyev, a Russian agriculture minister. He is  
24 high up in the Russian Parliament. He is a well-known,  
25 very wealthy individual, and had some status. They told

1 me they could get information on this man."

2 A. That's correct.

3 Q. So you knew at this point that you were -- or they were

4 promising to --

5 A. Promising, yes.

6 Q. -- provide you with information about somebody in a very

7 high-ranking position within the Russian government

8 exposing their involvement in organised criminal

9 corruption?

10 A. That's correct, yes.

11 Q. If we could then quickly turn to INQ015734, that is

12 a document which appears to record certain information

13 about Mr Gordeyev. Do you recognise the form of that

14 document?

15 A. I believe -- I'm not sure. I'm not sure. I haven't

16 seen that -- I can't remember that document.

17 Q. If we look towards the top, can we pull out a little

18 bit, and then just zoom in at the section on the top

19 left. Does that help you at all, reference to

20 Cavendish Square, is that something that jogs your

21 memory in any way?

22 A. I don't recognise the operation name.

23 Q. But is that a document that would have emerged from your

24 firm?

25 A. Yes, I believe so, yes.

1 Q. So it's a file record of some sort held by your company?

2 A. Yes.

3 Q. Obviously the basic information there is simply who he

4 is, what his -- and the very most brief outline, what

5 his CV looked like?

6 A. Yes, very brief, yes.

7 Q. Nothing there on the face of it that deals with the

8 allegations of corruption within your records?

9 A. No.

10 Q. If we look at INQ015735, can we just enlarge that

11 document. First of all, do you recognise the writing at

12 the bottom right-hand corner of that document?

13 A. That appears to be mine.

14 Q. We can see that there's a date there, 11 September 2006,

15 "meeting okay". Does that tell us anything -- we see

16 the meeting itself is dated "meeting 5 May 2006" at the

17 top, if that is correct. Do you want to have a moment

18 to familiarise yourself with the document?

19 A. (Pause)

20 I vaguely remember this, yes. It's in furtherance

21 of those enquiries.

22 Q. This looks as though it relates to a May meeting with

23 Mr Litvinenko and Mr Lugovoy, is that right?

24 A. It may not be, it may be information that's been given

25 to us that I'm reporting to Cliff Knuckey and probably

1 at one of the team meetings in the conference room.

2 Q. Let's look at that in more detail. It's dated 5 May  
3 which is around the time you were seeing Mr Litvinenko  
4 and Mr Lugovoy. The subject "G", can we be reasonably  
5 confident from looking through what is recorded there  
6 that that is a reference to Mr Gordeyev?

7 A. It is, yes.

8 Q. If we look at the bottom underneath the numeral list we  
9 can see that contact wishes to be paid 10,000 for the  
10 above info:

11 "Contact has been asked to establish any other  
12 criminal/questionable activity."

13 It says "contact" in the singular. That might be to  
14 two people rather than one, or would that be one person?

15 A. My contact was always Mr Litvinenko, always.

16 Q. Right. So Mr Lugovoy was, if you like, a subcontractor  
17 for your purposes?

18 A. He was basically the man in country who would do what  
19 was requested.

20 Q. So the contact that is referred to at the bottom of  
21 that, in the last two lines of that page, is  
22 Mr Litvinenko?

23 A. Yes.

24 Q. So you're saying Mr Litvinenko is indicating that he  
25 wishes for a USD 10,000 payment, and he has been asked

1 to establish any other criminal/questionable activity.  
2 Would that, can you tell from the context, be  
3 a reference to criminal/questionable activity by  
4 Mr Gordeyev or more generally?

5 A. On that document, it has to be recording Gordeyev.

6 Q. It looks as though maybe in fact you did task him to go  
7 back and dig deeper?

8 A. If there was on that person, yes. The information we  
9 got was quite scant. It was that he is a criminal, but  
10 that doesn't mean he is. So -- there to go and find  
11 information.

12 Q. Let's look at the information you did have, then,  
13 in May. First of all, he is a powerful person,  
14 number 1, and due to his position must be considered  
15 dangerous. When you say "dangerous", you mean  
16 commercially dangerous or physically dangerous or what?

17 A. If people were snooping around his business in Russia,  
18 I don't think he would be very happy, and I'm sure that  
19 they'd be warned off.

20 Q. Are you referring to a danger of physical reprisals  
21 there?

22 A. I have no knowledge of that, but I'm sure that if it  
23 came to light that people were making enquiries about  
24 a powerful man, he'd get to know about it and he'd do  
25 something about it.

1 Q. I entirely understand that it's your job to make  
2 enquiries.

3 A. Yes.

4 Q. But you have in fact, it appears in the last two lines,  
5 tasked Mr Litvinenko with doing that very thing, digging  
6 around and making further enquiries about this dangerous  
7 man?

8 A. They'd already started that and this is a continuance of  
9 it.

10 Q. I'm not for a moment suggesting that you put him in  
11 harm's way.

12 A. I understand.

13 Q. But he was, on your behalf and on your instructions,  
14 asking questions about a man who you had already  
15 assessed would be a dangerous man to ask questions  
16 about?

17 A. Allegedly, yes.

18 Q. "He [that is Gordeyev] is giving protection [this is  
19 number 2] in return for a monthly payment to a factory  
20 producing vodka and wine. The factory is considered  
21 legal, though the people behind it are criminals."

22 Do you see that?

23 A. Yes.

24 Q. Now, that presumably is the connection to the  
25 Stolichnaya dispute?



1 A. That is, and that was what was mentioned previously.

2 Q. So the information you were being given then was that

3 there was effectively a criminal protection racket

4 taking place?

5 A. That's what's been intimated, yes.

6 Q. With protection money being paid by criminals owning

7 a factory to a criminal in the Kremlin?

8 A. Yes.

9 Q. We can see at 3 that the factory was located on the

10 outskirts of Moscow, details of the ownerships are

11 unknown. Then 5, I don't know if you can help us with

12 this:

13 "G' id the 'roof' for this enterprise ..."

14 Is that a typo or does it mean something to you?

15 A. No, the roof is basically the person who gives other

16 people protection, people up the chain who know what

17 they're doing and protect them from enquiries or

18 prosecution or prying eyes and that's how it operates.

19 Q. When it says "id", should that be "is" or identify?

20 A. I think it's abbreviation, the roof has been ID-ed,

21 basically, whoever is giving him protection is known.

22 Q. And that's Gordeyev?

23 A. Yes.

24 Q. At the apex effectively of a criminal conspiracy?

25 A. Yes, he would be at the top of that.

1 Q. And therefore offers it protection from the authorities.  
2 And then this -- in terms of specificity, although maybe  
3 the details of the ownership wasn't known, it seems at  
4 item 6 that it is known who hands over the bribe every  
5 month.

6 A. Well, that's what was said. We never got any names.

7 Q. You didn't get that name?

8 A. No, I never got that name.

9 Q. But certainly what you were being told was that  
10 information could be given to you about the identity of  
11 the very person who handed the money to Gordeyev to  
12 continue this protection racket?

13 A. Yes, that's what was said that they could get, though it  
14 never came -- it never transpired and was never handed  
15 over.

16 Q. No, we understand that particularly given what we now  
17 know about Mr Lugovoy that it may well be that you were  
18 never going to get any reliable information?

19 A. That's very true, very true.

20 Q. But nonetheless, the tasking was to penetrate deep into  
21 what was, I'm sure you would agree, on the face of it,  
22 a dangerous organised criminal operation?

23 A. It could be, if what was said in the document pans out  
24 to be true, yes.

25 Q. "The people 'G' is associating with would cause

1 a scandal in their own right."

2 Does that mean anything to you now?

3 A. We weren't given names. Basically they were saying they  
4 are high-ups and there would be a fallout if it all got  
5 into the media.

6 Q. Are you indicating -- I mean, I don't want to put words  
7 into your mouth, but are you indicating there that  
8 Mr Gordeyev was -- the very associations he had, if they  
9 were known -- never mind what he'd done, the very people  
10 he was associating with would cause a scandal?

11 A. People would be tainted, yes.

12 Q. Did you understand that to mean that Gordeyev was  
13 associating with known organised criminals?

14 A. Well, yes, that's what I had been told.

15 Q. I'm not asking you to speak to the accuracy of this  
16 information.

17 A. That's fine, yes.

18 Q. But to what you were being told Mr Lugovoy would supply  
19 Mr Litvinenko with which would then be supplied to you.

20 A. Yes.

21 Q. Finally, the specificity would go down to being able at  
22 point 9 to provide you with the bank account details  
23 through which these transactions were --

24 A. Yes, we wanted basically evidence that what's being said  
25 is true.

1 MR EMMERSON: Yes, thank you very much.

2 THE CHAIRMAN: Yes, thank you very much, Mr Quirke. That's  
3 all.

4 A. Thank you, Chairman.

5 MR DAVIES: Can we just go back to that document, sorry,  
6 just for the transcript.

7 Yes, there's a possible misreading of point 4 on  
8 that document by my learned friend Mr Emmerson. Point 4  
9 reads:

10 "Details of the ownerships are known."

11 MR EMMERSON: Sorry, my mistake.

12 THE CHAIRMAN: Yes, thank you.

13 MR DAVIES: Plainly exhibit DQ4 can become an exhibit in  
14 these proceedings.

15 Can I recall Mr Mascall, please.

16 THE CHAIRMAN: Yes.

17 DETECTIVE INSPECTOR CRAIG MASCALL (resumed)

18 Questions by MR DAVIES (continued)

19 MR DAVIES: Mr Mascall, we are going to conclude, insofar as  
20 we can take it, events of 16 to 18 October from the  
21 police enquiry and otherwise. Can we have on screen,  
22 please, one point of clarification or confirmation:  
23 INQ019267. It's a statement from a Mr Hodgson.  
24 Mr Mascall, when you were last giving evidence, you made  
25 the point that the contamination schedule for

1 Dar Marrakesh, the restaurant on the night of the 16th,  
2 you believed that the item examined was a pipe.

3 A. Yes, that's correct.

4 Q. A shisha pipe of some sort. Indeed, this is the  
5 statement from Mr Hodgson confirming the accuracy of  
6 what you said in that regard.

7 A. Yes, that's the same reading, 15 counts per second.

8 Q. Thank you. Let's pick up, if we may then, please, on  
9 the morning of 17 October. We're going to read in  
10 a statement now -- no, we won't, we'll take it more  
11 chronologically than that.

12 Did you, Mr Mascall, establish the movements of  
13 Mr Litvinenko that day by reference to the public  
14 transport record?

15 A. Yes, the public transport records and the use of his  
16 telephone and cell site analysis.

17 Q. If we have up, please, INQ006492 and the page before  
18 6491 -- my apologies, 6490, the 17th, please, halfway  
19 down the page and it's a document we've seen before, but  
20 it shows Mr Litvinenko's card being used to board  
21 a number 134 bus, registration LN51 KXZ at 14.02 hours,  
22 Tesco, Colney Hatch area?

23 A. Yes.

24 Q. Was that bus tested for alpha radiation on  
25 21 December 2006?

1 A. Yes, it was, it was clean and found to have no  
2 contamination.

3 Q. Thank you. You then made enquiry of a meeting as  
4 between Mr Lugovoy and Mr Kovtun with a Dr Shadrin at 58  
5 Grosvenor Street at or about 3.00 pm.

6 A. Yes, that's correct.

7 Q. We're going to hear from Mr Shadrin later in these  
8 proceedings, so we will not deal with that through you  
9 for present purposes. Suffice to say, however, those  
10 offices at 58 Grosvenor Street were tested for alpha  
11 radiation on 27 November 2006 and positive readings were  
12 taken in the ground floor, first floor and the sofa in  
13 the reception area, and Dr Shadrin and his assistant,  
14 Ms Pridmore, also gave positive readings?

15 A. Yes, that's correct.

16 Q. We can revert to the detail of that later. We have  
17 heard already as to a meeting between Mr Kovtun and  
18 Mr Litvinenko at RISC Management that day.

19 A. Yes.

20 Q. In that context, sir, I'll read the statement of Valuev  
21 and whilst that's coming up, could we have phone  
22 schedule INQ017867 up, please, just to get the context  
23 back in our minds. The lower half of that page shows,  
24 does it not, Mr Mascall, at 10.56 a telephone call on  
25 the 17th, Alexander Litvinenko 1 to Daniel Quirke?

1 A. Yes, that's correct.

2 Q. A series of other phone calls that day involving  
3 Mr Shadrin, Mr Reilly, and so on. If we go to the next  
4 page, please, 868, we see the chronology continuing, and  
5 we start to see the name Alexey Valuev introduced,  
6 14.30 hours, correct?

7 A. That's correct, yes.

8 Q. And some further entries, 17.00, 17.43 involving calls  
9 from Mr Litvinenko to Mr Quirke?

10 A. Yes.

11 Q. Perhaps if that is just on screen while I read this  
12 statement, the degree of correlation between the two can  
13 be obvious to everybody.

14 THE CHAIRMAN: Yes.

15 MR ALEXEY VALUEV (evidence read)

16 MR DAVIES: It's a statement from Alexey Valuev, when aged  
17 17 years.

18 Student, signed and dated 12 December 2006.

19 In material part, it's INQ003113, in material part:

20 "I have been asked by the police about my father who  
21 was called Vladimir Valuev. I was born in Russia and  
22 lived there in the care of my father until May 1999 when  
23 I came to England to live with my mother. I stayed in  
24 contact with my father and I visit Russia twice a year  
25 to stay with him. The last time I was in Russia was

1           between 6 July until 8 August 2006.

2           "My father has only been to the UK on one occasion  
3           to the best of my knowledge. He was in London for one  
4           night earlier this year. I cannot be sure when it was,  
5           but I think it may have been late February/early March.  
6           My father came with a man who I know as Andrei Lugovoy.  
7           I met them both that afternoon. The next time I saw my  
8           dad was in Russia during the summer. I do speak to him  
9           on the telephone on the basis of once or twice a month  
10          depending on what is happening. The next time I saw  
11          Lugovoy in the United Kingdom was on ..."

12          His statement reads 16 October 2006, but a further  
13          statement corrects that, sir, to the 17th.

14   THE CHAIRMAN: Thank you.

15   MR DAVIES: "I remember this date because it was the  
16          European Cup match between CSKA Moscow and Arsenal being  
17          played in Moscow. My father had telephoned before the  
18          date, maybe 14/15 October, and told me Lugovoy would be  
19          in London.

20          "On 16 October, Andrei Lugovoy contacted me on my  
21          mobile phone. He left a voicemail for me telling me to  
22          call him. I called him when I got back from school and  
23          we arranged to meet as Andrei had some money for me from  
24          my father. I knew that it would be USD 1,000 to pay for  
25          my driving lessons. Lugovoy told me that he was in



1 Knightsbridge and for me to go there. I went to  
2 Knightsbridge, found a pub, and watched the first half  
3 of the game.

4 "At halftime, I rang Lugovoy to find out what was  
5 happening. He said he had got meetings, was still busy,  
6 and he would be done soon and he would give me a ring  
7 when he was free. I went back to the pub for a while,  
8 then had a wander inside Harrods. I then stood outside  
9 and waited for the phone call. Lugovoy called and told  
10 me to go to the Parkes Hotel.

11 "I got directions from a news stand and walked  
12 there. I waited outside the hotel for a short time  
13 until Lugovoy turned up in a black taxi. He was with  
14 a guy who I now know is Kovtun. At this stage, I did  
15 not know him. I think Litvinenko was also with Lugovoy.  
16 Again, I did not know him at this stage. I shook hands  
17 and we went into the hotel. Litvinenko waited  
18 downstairs.

19 "Lugovoy, Kovtun and myself went upstairs to  
20 Lugovoy's room. We tried to find the game on the TV  
21 because there was still about 15 to 20 minutes left.  
22 There was no channel with the game available. Lugovoy  
23 called my dad to ask the score and I had a bit of a chat  
24 with him. Kovtun gave me an envelope with US dollars in  
25 it and asked me to count it which I did and placed in my

1 pocket. Lugovoy and Kovtun had a whisky, I had  
2 a Red Bull from the minibar, we drank these and went  
3 downstairs.

4 "Litvinenko was sat in the lounge and we joined him.  
5 I am not sure if there was anyone else there. I cannot  
6 remember. Lugovoy was still on the phone about the  
7 game. I made smalltalk with all of them. The game  
8 ended with a one nil win to Moscow.

9 "After this, we all left the hotel, walked down to  
10 the main road. I turned right towards the tube.  
11 Litvinenko, Kovtun and Lugovoy turned left after  
12 a photograph was taken by Litvinenko. I went home.

13 "The return match between CSKA and Arsenal was due  
14 to take place at Highbury on 1 November 2006. My dad  
15 said that he and a group would be over for the game and  
16 that I was also going. This arrangement had been made  
17 shortly after the groups were drawn. My dad had then  
18 called to say he could not be at the game. I cannot  
19 remember when he told me this. He said that Lugovoy and  
20 his family were still coming over and that I would go to  
21 the game with Lugovoy."

22 That deals with the part of the statement concerned  
23 with the 17th.

24 DETECTIVE INSPECTOR CRAIG MASCALL (resumed)

25 Questions by MR DAVIES (continued)

1 MR DAVIES: Mr Mascall, were the premises of RISC Management  
2 monitored for radiation?  
3 A. Yes, they were.  
4 Q. The schedule in relation to that radiation reflects some  
5 contamination within the scene?  
6 A. That's correct.  
7 Q. Including on the CD and mini-disk taken from those  
8 premises?  
9 A. Yes, they were checked and the disk, the CD-ROM, also  
10 was contaminated.  
11 Q. The relative levels of contamination, can you remember?  
12 A. I can't remember the exact levels, sir, no.  
13 Q. If we can have on screen, please, INQ018016, we have  
14 a schedule extending to four pages in relation to  
15 RISC Management, correct?  
16 A. Yes, that's correct.  
17 Q. Testing starting 3 December 2006. A number of plainly  
18 positive readings in terms of alpha radiation extending  
19 to over 100 on chairs, but more pertinently, at  
20 INQ018018, 8 December 2012, testing of the CD, a reading  
21 of 800.  
22 A. Yes, that's correct.  
23 Q. And the memory stick a reading of, by comparison, just  
24 8?  
25 A. Yes.

1 Q. Is that the memory stick given to you by Mr Quirke that  
2 he'd received from Mr Kovtun?

3 A. I would have to check, sir, I don't know if it's the  
4 same stick from just looking at that.

5 Q. All right. We'll do that and come back to it if  
6 necessary.

7 We've covered some of this already, but according to  
8 Mr Lugovoy's interview of 11 December in Russia, he gave  
9 an account, didn't he, that he, Mr Kovtun, and  
10 Mr Litvinenko went to the Parkes Hotel together?

11 A. Yes, that's correct.

12 Q. Consistent with what we've just heard from young Valuev?

13 A. Yes, very consistent.

14 Q. In the same, Mr Litvinenko for his part, indicated --  
15 don't need it up, but INQ016616 -- that they'd travelled  
16 to Chinatown for a meal together?

17 A. Yes.

18 Q. And indeed went to the Golden Dragon Chinese restaurant  
19 at 27 Gerrard Street?

20 A. Yes, that's correct.

21 Q. And you have recovered -- I needn't put it up -- an  
22 invoice from that restaurant, INQ003082, in relation to  
23 that meal.

24 A. Yes.

25 Q. [REDACTED]

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED], but further detail or different  
4 detail was added in statements as part of the Terluk  
5 proceedings?

6 A. [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED], and then later on there was  
10 a different account where it was Mr Lugovoy who left  
11 Mr Litvinenko and Mr Kovtun to have a chat. But that  
12 then transpired, I believe, was in the walk away from  
13 the restaurant, not at the restaurant.

14 Q. All right. Can we have on screen, please, INQ001891?  
15 Sir, this is -- the first paragraph highlighted, please.  
16 To put this in context, this was the appended documents  
17 to Mr Lugovoy's statement in the Terluk proceedings.  
18 Sir, I don't repeat what Mr O'Connor said on Day 8 as to  
19 the context. But in the document, it appears to be  
20 describing the dinner in Chinatown that night involving  
21 the three men.

22 "In this connection [says Mr Lugovoy] I would like  
23 to tell you what Sasha had told Dmitri Kovtun not long  
24 before his death, when we met together in October of  
25 last year. During our dinner at one of the Chinatown

1 restaurants in London, Litvinenko, enlarging on the  
2 subject of ways to make money, touched upon the resumed  
3 negotiations between Russia and the UK regarding  
4 Berezovsky's extradition. Lamenting the fact that  
5 Berezovsky did not appreciate the services rendered to  
6 him by Litvinenko, who allegedly saved his life more  
7 than once, Litvinenko told Kovtun that he had the most  
8 important materials of compromising nature, regarding  
9 the illegal activity of Berezovsky on UK territory.

10 "If any part of the documents pertaining to the  
11 circumstances of his obtaining the refugee status were  
12 to be made public, then he (Berezovsky) would have huge  
13 problems. Litvinenko hinted to Dima that especially  
14 now, when Russia raised an issue with the UK of  
15 extraditing Berezovsky, it would be very opportune to  
16 let Berezovsky know that such materials exist and to put  
17 a value of several million dollars on them. Still being  
18 financially dependent on Berezovsky -- Berezovsky was  
19 paying his son's tuition fees and the family's  
20 accommodation in London, Litvinenko -- Litvinenko asked  
21 Kovtun to find a reliable person, whom he would  
22 introduce to Berezovsky, which person would be able to  
23 familiarise Berezovsky with the materials compromising  
24 him.

25 "Litvinenko was absolutely sure of the success of

1           this enterprise, referring to the explosive nature and  
2           authenticity of the compromising materials he possessed.  
3           Since the conversation took place when I left the table,  
4           Litvinenko asked Kovtun to keep that conversation  
5           between them, fearing that I, as a person who could  
6           contact Berezovsky at any point, would expose  
7           Litvinenko's idea to him."

8           So that is part of his appended material in the  
9           Terluk proceedings, introducing claims that  
10          Mr Litvinenko was effectively plotting some form of  
11          blackmail attempt on Mr Berezovsky through Mr Kovtun at  
12          the meeting in the Chinese restaurant?

13        A. Yes.

14        Q. Which is a somewhat different or at least amplified  
15          account compared to those that had been given earlier  
16          in December 2006, for example.

17        A. That's correct, and I've seen nothing to corroborate  
18          that information at all.

19        Q. Nothing to corroborate it?

20        A. No.

21        Q. Thank you, that can come down.

22          You have established payments at the Golden Dragon  
23          restaurant at 21.49 hours by Mr Lugovoy for that meal.

24        A. Yes, with his credit card.

25        Q. With his credit card. Was the Golden Dragon restaurant

1 analysed for contamination?

2 A. Yes, it was, and I believe it was found to be clean.

3 Q. Did you then track the men's movements through other  
4 addresses, starting with Cafe Boheme/Barcelona in  
5 Old Compton Street?

6 A. That's correct, yes.

7 Q. Where you have again a timed receipt, INQ006370, payment  
8 by Mr Lugovoy's MasterCard for various alcoholic drinks?

9 A. Yes, that's correct.

10 Q. Mr Litvinenko indicated in his interviews from hospital  
11 that he had not stayed much beyond that and didn't drink  
12 any alcohol. Is that correct?

13 A. Yes, that's correct. There's several accounts that  
14 Mr Litvinenko did not drink and Mr Lugovoy himself has  
15 said that he accepts Mr Litvinenko did not drink.

16 Q. You have further timed receipts, INQ006370 and 6371  
17 respectively, for payments for alcohol on that date.

18 A. Yes.

19 Q. You have then identified that at 10.41 pm, Mr Litvinenko  
20 travelled home on a 134 bus, registration X636 LLX,  
21 boarding at Tottenham Court Road station?

22 A. Yes, that was this document you called up earlier.

23 Q. Was that bus monitored for alpha radiation on  
24 8 December?

25 A. Yes, it was, and it was found to be clean.



1 Q. There's no suggestion on the document we've seen more  
2 than once now of Mr Litvinenko travelling back into  
3 London later that day?

4 A. No, he travelled home.

5 Q. Mr Lugovoy and Mr Kovtun are demonstrated to have gone  
6 to Hey Jo's night club in Jermyn Street, Piccadilly,  
7 returning to the hotel at about 3.00 am?

8 A. Yes, that's correct.

9 Q. You have produced exhibits demonstrating purchases  
10 between 6360 and 6363, effectively payments by  
11 Mr Lugovoy for more alcohol?

12 A. Yes.

13 Q. And Hey Jo's night club was tested for contamination and  
14 in fact on this occasion was found to have suffered some  
15 contamination?

16 A. That's correct, yes.

17 Q. INQ018024, please. Date of testing, 10 January 2007.  
18 We can see the readings for ourselves. It's  
19 a three-page schedule. Cubicle door edge at 6, back  
20 rests and so on in various cubicles around the place,  
21 readings up to 25, a number of readings at different  
22 locations?

23 A. Yes.

24 Q. 18025, please. Just to continue this exercise, other  
25 readings up to 15 on that schedule, and finally 18026.

1 A spot on the post at the bottom of the stairs at 3.

2 A. Yes.

3 Q. A level of 3 counts per second. Now, we have covered

4 the evidence as to Messrs Lugovoy and Kovtun checking in

5 and out of the Parkes Hotel on 17 and 18 January and how

6 that bill was settled --

7 A. Yes.

8 Q. -- by Mr Lugovoy. We won't go through that again. You

9 also established through a Ms Furlani, INQ016384 and 5,

10 that they took a taxi from the Parkes Hotel to Gatwick

11 airport on that date in order to catch their flight?

12 A. Yes, extensive enquiries were conducted to try and

13 identify that taxi or their mode of transport, and on

14 speaking to Ms Furlani, it was identified that they had

15 actually taken a taxi but we were unable to trace it.

16 Q. So the specific taxi could not be traced, but the

17 essential time of departure was corroborated through

18 Ms Furlani at the hotel?

19 A. Yes, that's correct.

20 Q. At the airport, did Mr Lugovoy use his credit card to

21 make a number of timed purchases?

22 A. Yes, he did. He went to Millie's Cookies,

23 a Caviar House and a World Duty Free shop.

24 Q. And respective times of purchase, 10.51, 11.19 and

25 11.22?

1 A. Yes, that's correct.

2 Q. And to take the Caviar House one, for example,  
3 INQ006365, please. We can see you have done this for  
4 all the purchases.

5 A. Yes.

6 Q. INQ017245, we can see that particular purchase relates  
7 to oysters, champagne, as they head off for Moscow?

8 A. Yes.

9 Q. We've already covered the ground, Mr Mascall, as to the  
10 home-bound flight, UN444 Transaero, tailfin EI-DNM?

11 A. Yes.

12 Q. And the contamination on seats 26F and 26E?

13 A. Yes, that's correct.

14 Q. Those were their seats, forgive me, and radiation on  
15 25D, 26D, 27D and in uprights between 26D and 26E?

16 A. That's correct.

17 Q. At a relatively early stage of your investigation, did  
18 you engage the services of forensic experts in the  
19 question of cell site evidence?

20 A. Yes, we did. That was work conducted by the phones  
21 officer and the analyst.

22 MR DAVIES: Sir, we produce the respective reports and  
23 documentation: INQ019348.

24 THE CHAIRMAN: Yes.

25 MR DAVIES: That document, and we produce INQ019311, that

1 document, for the purpose of transparency and public  
2 access to these materials.

3 THE CHAIRMAN: Yes.

4 MR DAVIES: Mr Mascall, are you able to add to the face of  
5 the documents in terms of interpretation?

6 A. They corroborate the movements of Mr Litvinenko and  
7 Mr Lugovoy on the days in question.

8 Q. Can you confirm that when we see these reports, there's  
9 a slightly different nomenclature, isn't there, used in  
10 relation to them, so if you could pull up INQ019352,  
11 please. Try 356. 0193 -- that's the one.

12 Could you look at this coding. At this stage you  
13 hadn't produced your master telephone schedule with its  
14 attributions.

15 A. No, we hadn't, but that has been produced with those  
16 colour codings in mind.

17 Q. Yes. So this analysis came first and you sought to  
18 transpose the colours at least to our own master  
19 schedule.

20 A. That's correct, yes.

21 Q. I'll be corrected if I'm wrong, but when one goes  
22 through these colours, the lime phone ending 160 is our  
23 Lugovoy 1; brown phone ending 469, Litvinenko 2; blue  
24 phone ending 586, Litvinenko 1; green phone ending 420,  
25 Lugovoy 2; pink phone ending 707 is Litvinenko 3?

1 A. Yes, that's correct.

2 Q. Thank you. That's a relief.

3 A. Likewise.

4 MR DAVIES: Sir, that's as far as I propose to take those  
5 events for today.

6 THE CHAIRMAN: Good.

7 MR STRAW: Sorry, there is one area of questioning, if  
8 I may.

9 THE CHAIRMAN: Yes, Mr Straw.

10 Questions by MR STRAW

11 MR STRAW: Thank you. Mr Mascall, I'd like to ask you  
12 simply about the suggestion from Mr Lugovoy that  
13 Mr Litvinenko raised the idea of blackmailing Berezovsky  
14 back on 17 October 2006.

15 You've already been referred to Mr Lugovoy's

16 11 December 2006 interview. [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 A. Without having a document in front of me, sir, I don't  
21 know, I'd have to double-check, but the first I'm  
22 aware -- the first account that's given is that

23 [REDACTED]

24 [REDACTED]

25 [REDACTED] The issue around blackmailing is not raised

1           until some time later and I believe it is in that  
2           statement.

3   Q.    Could we have a look just to help you then at INQ002744.  
4           This is the 11 December 2006 interview.

5           Can you see about halfway down the page [REDACTED]  
6           [REDACTED]

7   A.    [REDACTED]

8   Q.    [REDACTED]  
9           [REDACTED]  
10          [REDACTED]

11   A.    [REDACTED]

12   Q.    [REDACTED]  
13          [REDACTED]

14   A.    [REDACTED]

15   Q.    You've already referred to and had brought up on screen  
16           Mr Lugovoy's later statement which was INQ1891, and  
17           we've seen at that stage Mr Lugovoy says that he left  
18           Mr Kovtun and Alexander Litvinenko alone at the Chinese  
19           restaurant.

20   A.    Yes, I believe -- I believe so. I don't know if it's  
21           that or whether it's a different document that says that  
22           actually happens when they're walking away from the  
23           restaurant, it's a conversation that they have together,  
24           and is subsequently told to Mr Lugovoy.

25   Q.    Just to make it very clear, then, let's have that back

1 on screen, INQ001891, please.

2 MR DAVIES: Sir, could I just interrupt? You haven't been  
3 invited to give permission at this stage for questioning  
4 on this theme from core participants and it isn't within  
5 the permission you've presently granted. I just wonder  
6 if it is appropriate for this scrutiny to continue if it  
7 comes by way of formal application later.

8 THE CHAIRMAN: Mr Straw, this is in fact something which  
9 we've had in evidence already, isn't it, and you're  
10 seeking to reinforce the point, I think.

11 MR STRAW: The main reason for asking this is to bring in  
12 one document that hadn't been in evidence already which  
13 gives an inconsistent account from Mr Lugovoy to the two  
14 that have been in evidence. I haven't come to that  
15 document yet, but perhaps the easiest way of doing it --  
16 and I apologise for raising this without asking for  
17 permission first, sir -- is simply to refer you to the  
18 page of that.

19 THE CHAIRMAN: Yes. Let's see it, because I think it's what  
20 you had in mind, isn't it, when you were answering the  
21 questions earlier on?

22 A. Possibly.

23 THE CHAIRMAN: I thought so. Let's have a look at the  
24 document.

25 MR STRAW: It's INQ001808. We've seen the start page of

1           this already. It's the witness statement by Mr Lugovoy  
2           dated 4 March 2011 for the Terluk Court of Appeal  
3           proceedings, and at paragraph 127, there's an account of  
4           the blackmailing.

5 THE CHAIRMAN: Yes, this is what you have touched on  
6           already, yes.

7 MR STRAW: It's at that stage, isn't it, that Mr Lugovoy  
8           says the blackmail allegation was actually raised while  
9           they were walking along rather than while they were at  
10          the Chinese restaurant?

11 A. That's correct, I knew it was outside of the restaurant.

12 THE CHAIRMAN: Thank you, Mr Straw.

13           Yes, very well. 10.00 tomorrow morning.

14 (3.02 pm)

15           (The Inquiry adjourned until 10.00 am on  
16           Tuesday, 17 February 2015)

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