

<p>1 Thursday, 16 October 2014</p> <p>2 (10.00 am)</p> <p>3 MS DOLAN: Morning, sir. The first witness is Mr Balmaceda.</p> <p>4 MR JOSEPH REYES BALMACEDA (sworn)</p> <p>5 Questions from MS DOLAN</p> <p>6 MS DOLAN: Sir, Mr Balmaceda has difficulty hearing. His</p> <p>7 colleague was going to sit next to him and if necessary</p> <p>8 repeat, but he is just out of court at the moment.</p> <p>9 THE CORONER: Can you hear all right at the moment?</p> <p>10 <b>A. Make a loud voice, sir.</b></p> <p>11 THE CORONER: If I speak very loudly can you hear me at the</p> <p>12 moment?</p> <p>13 <b>A. Yes.</b></p> <p>14 THE CORONER: You can. Well here's a gentleman who is going</p> <p>15 to help you if you can't hear, all right, he'll relay</p> <p>16 anything. So if you have any difficulty will you be</p> <p>17 sure to say?</p> <p>18 <b>A. Yes.</b></p> <p>19 THE CORONER: Good morning, and you understand that if he</p> <p>20 has any difficulty picking anything up will you just</p> <p>21 please repeat it very loudly so he can hear.</p> <p>22 WITNESS ASSISTANT: Yes.</p> <p>23 THE CORONER: Thank you very much.</p> <p>24 MS DOLAN: Good morning, Mr Balmaceda.</p> <p>25 <b>A. Good morning.</b></p> <p style="text-align: center;">Page 1</p>	<p>1 was that? We have a cursor so that the technical guys</p> <p>2 here can put a cursor on and you can tell it where to</p> <p>3 move. Do you see the little arrow?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Can you tell it which way to move to get to the</p> <p>6 guardhouse?</p> <p>7 <b>A. Yes, that's where we get our pick up.</b></p> <p>8 Q. Is that the guardhouse that the arrow is on at the</p> <p>9 moment?</p> <p>10 <b>A. Yes, yes.</b></p> <p>11 Q. And you say you get your pick up there, so how far had</p> <p>12 you got that morning before the events began?</p> <p>13 <b>A. When we are getting the T card we hear some gunshots and</b></p> <p>14 <b>when I look up to the sky I saw some sparks, something</b></p> <p>15 <b>like that that's not just --</b></p> <p>16 Q. Could you see where they were coming from?</p> <p>17 <b>A. From different directions and I heard some shouting that</b></p> <p>18 <b>I did not understand but -- their language, so --</b></p> <p>19 Q. Did you see where the shouting was coming from?</p> <p>20 <b>A. From the parking area, from the guardhouse, because</b></p> <p>21 <b>there is also some guys at the guardhouse that are</b></p> <p>22 <b>shouting, but I did not understand what they are talking</b></p> <p>23 <b>about.</b></p> <p>24 Q. How far were you away from them when the chaps at the</p> <p>25 guardhouse were shouting?</p> <p style="text-align: center;">Page 3</p>
<p>1 Q. Can you give us your full name please?</p> <p>2 <b>A. Joseph Reyes Balmaceda.</b></p> <p>3 Q. I think in January 2013 you were working at In Amenas?</p> <p>4 <b>A. Yes, ma'am.</b></p> <p>5 Q. And what was your job there?</p> <p>6 <b>A. I was on the technical support group working for Atex.</b></p> <p>7 Q. And how long had you been working at In Amenas?</p> <p>8 <b>A. Since 2006.</b></p> <p>9 Q. I want to ask you about what happened on 16 January.</p> <p>10 Can you tell us where you were at the beginning of the</p> <p>11 day on 16 January, please?</p> <p>12 <b>A. On 16 January when we are going to the office to the</b></p> <p>13 <b>plant we are going to get our pick up on the guardhouse.</b></p> <p>14 Q. And you say "we", who was we, who was with you?</p> <p>15 <b>A. Angelito Manaos, Bhong Santiago, Raffy Edubane and</b></p> <p>16 <b>German De Guzman.</b></p> <p>17 Q. And where were you when you were together?</p> <p>18 <b>A. At the guardhouse.</b></p> <p>19 Q. I am going to put a picture of a photograph of the BdV</p> <p>20 area and I would like you to show us where you were at</p> <p>21 the beginning of the day. Can we enlarge that, please.</p> <p>22 Do you recognise this area?</p> <p>23 <b>A. Yes, ma'am.</b></p> <p>24 Q. And when you were with your colleagues at the beginning</p> <p>25 of the day you said you were at the guardhouse. Where</p> <p style="text-align: center;">Page 2</p>	<p>1 <b>A. It is very near because that day was the first hour of</b></p> <p>2 <b>the work that's why lots of people are getting to</b></p> <p>3 <b>collect their T cards.</b></p> <p>4 Q. Did you see who the men at the guardhouse were shouting</p> <p>5 at?</p> <p>6 <b>A. I remember one guy.</b></p> <p>7 Q. And can you describe him, please?</p> <p>8 <b>A. He's a local guy.</b></p> <p>9 Q. A local guy?</p> <p>10 <b>A. Algerian guy.</b></p> <p>11 Q. Where was he?</p> <p>12 <b>A. He was inside the guardhouse.</b></p> <p>13 Q. And he was one of the people shouting or one of the</p> <p>14 people being shouted at?</p> <p>15 <b>A. He's the one also shouting that when -- because he's our</b></p> <p>16 <b>translator, that's why I remember him. I told him</b></p> <p>17 <b>"What, what's going on?" "You need to hide, you need to</b></p> <p>18 <b>hide." That's why we decided to hide at the guardhouse.</b></p> <p>19 Q. At that point had you seen any other vehicles?</p> <p>20 <b>A. No.</b></p> <p>21 Q. Can I just ask you again, you said you saw shots coming</p> <p>22 from all directions?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. That sounds like they're absolutely everywhere around</p> <p>25 you. Can you be more precise about which directions,</p> <p style="text-align: center;">Page 4</p>

1 which general directions?  
 2 **A. I just look up and in the sky I saw some bullet passing**  
 3 **by, some sparks and I heard some explosion also.**  
 4 Q. Were they going two different directions or were -- what  
 5 can you remember?  
 6 **A. Two different directions.**  
 7 Q. Which directions were they, can you describe -- maybe if  
 8 it helps to use this plan where the bullets were coming  
 9 from and going to, any bullets you can recall?  
 10 **A. When I look up on the sky this side. (Indicated)**  
 11 Q. So where do you want the cursor to go? Whereabouts on  
 12 this plan, where on the plan were the bullets coming  
 13 from, which side?  
 14 **A. Above the roof that I saw.**  
 15 Q. Sorry, we can't -- I can't see where you are pointing.  
 16 Which roof?  
 17 **A. At the guardhouse.**  
 18 Q. Above the guardhouse roof?  
 19 **A. Yes.**  
 20 Q. But from which direction?  
 21 **A. (Answer assisted) You can say either from your right to**  
 22 **your left or from the left to the right. I think the**  
 23 **question is where it is coming from, is that correct,**  
 24 **ma'am?**  
 25 Q. Which side were they coming from?  
 Page 5

1 **A. Right side and left side.**  
 2 **A. (Answer assisted) Both sides.**  
 3 Q. So you said you hid, you said you went to hide, where  
 4 did you hide?  
 5 **A. Inside the guardhouse.**  
 6 Q. Inside the building?  
 7 **A. Yes.**  
 8 Q. What happened next?  
 9 **A. Since we are hiding we asked the local guy, I mean, what**  
 10 **is going on, ask what really, but he told me, "Just keep**  
 11 **on hiding, don't talk, don't talk", because I knew one**  
 12 **guy with us who is American guy named Fred Buttaccio,**  
 13 **but Fred was going on -- really I don't know because we**  
 14 **did not understand their language. That's why we keep**  
 15 **talking in our language, Filipino, and I told to Bhong,**  
 16 **our senior inspector, "Did you understand their**  
 17 **language?" "No, just keep quiet, just keep lying on the**  
 18 **floor."**  
 19 Q. So you were lying on the floor?  
 20 **A. Mmm.**  
 21 Q. Around you mentioned Fred Buttaccio was there. Who else  
 22 was there with you, you mentioned your colleagues and  
 23 you told us about Bhong and Raffy?  
 24 **A. Raffy, Angel, Bhong and Gerry and Fred.**  
 25 Q. And anybody else?  
 Page 6

1 **A. And the local guy, Amin.**  
 2 Q. Amin, an Algerian?  
 3 **A. Yes.**  
 4 Q. No other non-Algerians with you?  
 5 **A. There is some but I did not know them.**  
 6 Q. How many other people were there?  
 7 **A. Ten.**  
 8 Q. Is that including the Algerian guard?  
 9 **A. Yes, ma'am.**  
 10 Q. How many guards were there?  
 11 **A. Three.**  
 12 Q. You said you were on the floor. Did you hear anything  
 13 happening outside at that time?  
 14 **A. Yes, we heard some gunshots, explosion and shouting,**  
 15 **I don't know what they're really -- the meaning of what.**  
 16 **Commonly we asked the translator that. I mean, "Did you**  
 17 **understand? You are the translator here, supposed to**  
 18 **know their language." "No, no, no." He refused to tell**  
 19 **us.**  
 20 Q. What about vehicles? Any noise from vehicles around?  
 21 **A. Because we were lying on the floor, five -- six o'clock**  
 22 **until 11.30, that's why we did not know what happened**  
 23 **outside and at that time we decide to get out, but we**  
 24 **need to check what's happening outside because I don't**  
 25 **want to die this way.**  
 Page 7

1 Q. So that was after some time you decided to check  
 2 outside?  
 3 **A. Yes.**  
 4 Q. Do you know about what time of day it was when you  
 5 decided to check outside? 6  
**A. 11.45 to 12.**  
 7 Q. What happened when you checked outside?  
 8 **A. Because that time nobody wants to be the first one on**  
 9 **the line. So I decided I must go first. If you don't**  
 10 **want I will do. Who will follow me? Then we decide me,**  
 11 **Bhong Santiago, Gerry -- Angel and Gerry and the sixth**  
 12 **man is Fred Buttaccio. When I get out first put on my**  
 13 **mind it was a wrong decision because we know that it**  
 14 **was -- we knew that it was already taken by the Algerian**  
 15 **forces but it's a mistake that we saw the other**  
 16 **terrorist.**  
 17 Q. So can I just ask you, when you said you thought it was  
 18 taken by Algerian forces you thought Algerian forces  
 19 were inside the base?  
 20 **A. I thought -- we knew because it was already, we didn't**  
 21 **hear any gunshots any more.**  
 22 Q. Ah, because it had gone quiet?  
 23 **A. Yes.**  
 24 Q. But then you realised that was a mistake. What happened  
 25 when you came out then?  
 Page 8

<p>1 <b>A. When we came out one militant came to us and they said,</b></p> <p>2 <b>"You're Indonesian?" "No. We came from Philippines.</b></p> <p>3 <b>We are from Filipino", so they are "Ah, go, go."</b></p> <p>4 Q. Can I just ask you, where were you when that happened?</p> <p>5 Because you had been in the guardhouse?</p> <p>6 <b>A. We got out.</b></p> <p>7 Q. How far from the guardhouse had you come?</p> <p>8 <b>A. We get out from the guardhouse and we are in the road by</b></p> <p>9 <b>the -- met in the road by the militants.</b></p> <p>10 Q. Met in the road. You tell us with the cursor where you</p> <p>11 were met?</p> <p>12 <b>A. Down, down, that side.</b></p> <p>13 Q. So you came back, because you were outside the BdV</p> <p>14 fence, the inner fence?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. And you came inside. Did you notice the position of the</p> <p>17 gate as you came in or not?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. How was the gate when you came in?</p> <p>20 <b>A. It was open because we saw some Algerian colleague who</b></p> <p>21 <b>is female getting out of the gate. That's why the gate</b></p> <p>22 <b>was open.</b></p> <p>23 Q. And this is the vehicle gate or the pedestrian gate?</p> <p>24 <b>A. No, the pedestrian gate only.</b></p> <p>25 Q. The pedestrian gate was open?</p> <p style="text-align: center;">Page 9</p>	<p>1 Q. They ignored you?</p> <p>2 <b>A. Yes. That's why, as I told you I am the first one who is</b></p> <p>3 <b>out of the guardhouse and I am the first one who ask, so</b></p> <p>4 <b>I joined the crowd.</b></p> <p>5 Q. So you were by yourself at this time?</p> <p>6 <b>A. So I walked, going to that crowd but when the sixth</b></p> <p>7 <b>person asked by their nationality and they starts to</b></p> <p>8 <b>shout.</b></p> <p>9 Q. Sorry, you said the sixth person asked?</p> <p>10 <b>A. It was Fred Buttaccio who was asked and he is asked</b></p> <p>11 <b>nationality, "American", then they start shouting. Then</b></p> <p>12 <b>after that one of my colleagues called us "Hey, Joe Joe,</b></p> <p>13 <b>come back here", because Bhong and Angel bring to the</b></p> <p>14 <b>plaza.</b></p> <p>15 Q. So Bhong and Angel had gone to the plaza?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. With the terrorists or had they gone there themselves?</p> <p>18 Were Bhong and Angel with the terrorists when they went</p> <p>19 to the plaza?</p> <p>20 <b>A. Yes, they were brought also with Fred Buttaccio when and</b></p> <p>21 <b>they knew the nationality. Then after that the</b></p> <p>22 <b>terrorists called us.</b></p> <p>23 Q. So then the terrorists called you over?</p> <p>24 <b>A. Yes, ma'am.</b></p> <p>25 Q. And you became a hostage?</p> <p style="text-align: center;">Page 11</p>
<p>1 <b>A. Yes.</b></p> <p>2 Q. And there were Algerian female colleagues leaving?</p> <p>3 <b>A. Yes, ma'am.</b></p> <p>4 Q. And it was at that time that you were coming out of the</p> <p>5 guardhouse?</p> <p>6 <b>A. Yes, ma'am.</b></p> <p>7 Q. So you came into the BdV and then you say you saw</p> <p>8 a terrorist?</p> <p>9 <b>A. Excuse me, ma'am?</b></p> <p>10 Q. You came into the BdV?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. And you saw the terrorists?</p> <p>13 <b>A. Yes, ma'am.</b></p> <p>14 Q. How many terrorists did you see at that time?</p> <p>15 <b>A. It was, the first one who approached us was Algerian.</b></p> <p>16 <b>And the second guy who approached us I don't know his</b></p> <p>17 <b>nationality but he's speaking in English.</b></p> <p>18 Q. So there were two terrorists?</p> <p>19 <b>A. Yes, the first time when they approached us. That was</b></p> <p>20 <b>asking our nationality.</b></p> <p>21 Q. I think you said you told him you were from the</p> <p>22 Philippines?</p> <p>23 <b>A. Yes, ma'am.</b></p> <p>24 Q. And then what happened next?</p> <p>25 <b>A. Before they ignore us.</b></p> <p style="text-align: center;">Page 10</p>	<p>1 <b>A. Yes, ma'am.</b></p> <p>2 Q. And I think did you see other terrorists at that point?</p> <p>3 <b>A. When we are being a hostage.</b></p> <p>4 Q. And what terrorists did you see?</p> <p>5 <b>A. If I am not mistaken I saw eight or more than eight.</b></p> <p>6 Q. I think when you wrote your witness statement to help</p> <p>7 the police you said that you saw one very -- an old fat</p> <p>8 man sitting outside the VIP room talking on a radio. Do</p> <p>9 you remember him?</p> <p>10 <b>A. Yes, ma'am.</b></p> <p>11 Q. Can you describe him, please?</p> <p>12 <b>A. He's a fat old guy.</b></p> <p>13 Q. What was he wearing?</p> <p>14 <b>A. Camouflage.</b></p> <p>15 Q. I think the microphone will pick up -- you don't need to</p> <p>16 lean forward. I am leaning forward so you can hear but</p> <p>17 I think it will pick up what you say without leaning</p> <p>18 forward maybe. Just tell us, so what was he wearing?</p> <p>19 <b>A. He's wearing a turban.</b></p> <p>20 Q. A turban, yes. And what about his clothing on his body?</p> <p>21 <b>A. Camouflage.</b></p> <p>22 Q. Camouflage. Do you recall what jacket he was wearing?</p> <p>23 <b>A. It's a vest, he's wearing.</b></p> <p>24 Q. When you wrote your witness statement you thought he was</p> <p>25 wearing a fleece jacket. Do you remember anything about</p> <p style="text-align: center;">Page 12</p>

1 that?

2 **A. The jacket was --**

3 Q. A vest, yes?

4 **A. Yes.**

5 Q. Do you remember a fleece jacket, seeing a fleece type of

6 jacket? Was this vest fleece?

7 **A. Yes.**

8 Q. Did he have anything clipped on it?

9 **A. Because I saw him with the jacket with grenade with**

10 **a radio, with some bullets on it and magazines.**

11 Q. When you wrote your witness statement you thought he had

12 an In Amenas ID clipped on to it. Do you remember that?

13 **A. Excuse me?**

14 Q. You said he was wearing an In Amenas ID clipped on his

15 fleece jacket? You don't remember that now?

16 **A. No.**

17 Q. I think you and your colleagues are now hostages and

18 I think they tied you up?

19 **A. Yes, ma'am.**

20 Q. Did they say anything when they were tying you up, the

21 terrorists?

22 **A. Excuse me?**

23 Q. Did the terrorists say anything while they were tying

24 you up?

25 **A. No, they just tied up. We were just tied up and I asked**

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1 **"What's this, what's happening?" Because the one tying**

2 **up did not understand English very well. So Bhong**

3 **Santiago asked in their language.**

4 Q. Because Bhong speaks Arabic, does he?

5 **A. A small bit, yes, and he said in English "What's**

6 **happening? What are you going to do with us?" And the**

7 **terrorists replied to Bhong, "We're not aware of you,**

8 **nobody will hurt you as long as I'm here." "So why are**

9 **you tying up all of us? So let us free." "No, no, no**

10 **no."**

11 Q. I think you said something about being interested in the

12 American and the French?

13 **A. Yes.**

14 Q. Did you see anybody else you knew amongst the hostages?

15 Did you see anybody else that you knew amongst the

16 hostages?

17 **A. Yes.**

18 Q. Who did you see that you knew?

19 **A. Excuse me?**

20 Q. Who did you see?

21 **A. Stephen McFaul, Nick Hitch, Iain Adamson, Stephen Green,**

22 **Fred Buttaccio, Kenneth Whiteside.**

23 Q. Did you know all of these men before that day?

24 **A. Yes, I cannot remember any more the other, but if you**

25 **show me some picture I can maybe --**

Page 14

1 Q. Did you know Carson Bilsland, did you know a man called

2 Carson Bilsland?

3 **A. Carson, yes.**

4 Q. You knew him?

5 **A. I know him.**

6 Q. Was he there when you were first taken hostage?

7 **A. I saw him going to the men's room because we are on**

8 **the -- in front of the VIP building. That's what the**

9 **terrorists told us, if we want to pee we need to ask**

10 **them, that's why they accompanied us to the men's room.**

11 Q. So you did see Carson at that point?

12 **A. I saw him.**

13 Q. Did you know a man called Sebastian John?

14 **A. (The witness shook his head)**

15 THE CORONER: You didn't know him?

16 **A. I didn't.**

17 MS DOLAN: Can I move on to what happened the next day on

18 the Thursday, on the second day?

19 **A. The second day.**

20 Q. Did you hear the terrorists talking on the telephone

21 with anybody in the morning?

22 **A. Yes.**

23 Q. What did you hear?

24 **A. They are talking and they are negotiating to pull out**

25 **the Algerian forces.**

Page 15

1 Q. Were you able to have any understanding of who they were

2 speaking to? Could you tell who they were speaking to?

3 **A. I don't have any idea, but I know the guy who is dealing**

4 **with it.**

5 Q. And who was that?

6 **A. It was the English guy, the terrorist guy with the eye**

7 **glasses.**

8 Q. So the terrorist who spoke English. Did he speak good

9 English?

10 **A. Yes, ma'am.**

11 Q. And then I think as the day went on there was a time

12 when you heard a helicopter overhead?

13 **A. Yes, ma'am.**

14 Q. What happened then?

15 **A. When we are on the plaza in front of the canteen the**

16 **helicopter came out on the other side and starts firing.**

17 **I saw it.**

18 Q. How close was it firing to the hostages?

19 **A. Very near.**

20 Q. Very near?

21 **A. Yes.**

22 Q. Did it hit any of the hostages, the bullets?

23 **A. No.**

24 Q. Did you see anybody get hit, any of the terrorists?

25 **A. No, ma'am.**

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<p>1 Q. And then I think some time after that the hostages were 2 put into cars? 3 <b>A. Yes, ma'am.</b> 4 Q. Can you tell me about what happened then? How were the 5 hostages put into the cars? 6 <b>A. On the morning we are transferred to the centre plaza 7 because we are on the other plaza. Then before we 8 transferred the English terrorist told me that -- told 9 us to raise our hands and show to the chopper that we 10 are the hostages and he told us that "Nobody will 11 attempt to run and I will shoot and kill everybody will 12 attempt."</b> 13 <b>So when we are being transferred on the centre plaza 14 they form us, they told us to form as a circle and then 15 when I am -- some of the Landcruiser starts to get on 16 the plaza, they form also the vehicles outside the 17 circle.</b> 18 Q. So they brought vehicles to outside the circle. Did you 19 see how many vehicles? 20 <b>A. If I'm not mistaken it's only, I saw seven only.</b> 21 Q. Seven. What happened next? 22 <b>A. I saw them, that they ordered Iain Adamson to get the 23 box, I don't know what box it was. It was a grey box. 24 Told him to get that box and come back quickly and then 25 on the centre plaza they start to prepare the</b></p> <p style="text-align: center;">Page 17</p>	<p>1 Q. Any other car that you saw people getting into? 2 <b>A. The car that I was being brought by the terrorists.</b> 3 Q. In the car that you were in, who was in that car? 4 <b>A. The Japanese personnel.</b> 5 Q. The Japanese personnel. Do you know how many Japanese 6 men? 7 <b>A. Five.</b> 8 Q. Five. And how many terrorists? 9 <b>A. Two.</b> 10 Q. Where were the terrorists sitting in the car? 11 <b>A. One is the driver and one is in the front and the other 12 are Japanese guy on the front and in the second row four 13 Japanese guy and Raffy Edubane who is lying on the lap 14 of the Japanese guy.</b> 15 Q. That was your colleague, Raffy, he was lying across the 16 middle row? 17 <b>A. He was lying on their lap.</b> 18 Q. So there are four Japanese and Raffy? 19 <b>A. Yes.</b> 20 Q. And then where were you? 21 <b>A. At the back, baggage compartment with one Malaysian guy, 22 Bhong Santiago and me.</b> 23 Q. Did you know him, the Malaysian guy? 24 <b>A. Before I don't, but when I read some article I know it's 25 Tan.</b></p> <p style="text-align: center;">Page 19</p>
<p>1 <b>ammunition, they load the gun with the bullets, they got 2 the grenade. They start preparing and then after that 3 they start to break up the hostages and bring them to 4 the car, who is outside the circle.</b> 5 Q. Did you see people getting into the cars, the hostages? 6 <b>A. Yes, ma'am.</b> 7 Q. Are you able to remember of the hostages you knew who 8 got into which car, do you remember who was put in which 9 car? 10 <b>A. Yes, ma'am, first they start from the leader who is 11 wounded with Fred and the French guy, Yann.</b> 12 Q. So the leader got into a car with Fred, that is Fred 13 Buttaccio and Yann, and that is Yann Desyeux, is it? 14 <b>A. Yes, ma'am.</b> 15 Q. And who else was in that car? 16 <b>A. That terrorist that was being wounded, that was the old 17 fat guy.</b> 18 Q. That was the old fat guy who was wounded? 19 <b>A. Yes.</b> 20 Q. So we have the old fat guy, Fred and Yann? 21 <b>A. Yes, ma'am.</b> 22 Q. Did you see anybody else who got into that car? 23 <b>A. No, ma'am.</b> 24 Q. Did anybody else get into that car? 25 <b>A. I did not see anyone.</b></p> <p style="text-align: center;">Page 18</p>	<p>1 Q. Tan? 2 <b>A. Tan was the name, and Bhong Santiago and me.</b> 3 Q. What about the other cars, did you see anybody get into 4 any of the other cars? 5 <b>A. No.</b> 6 Q. Did you see anything that happened to any of the men 7 that you knew, you told me that you knew Stephen Green 8 and Stephen McFaul and Nick Hitch? 9 <b>A. Yes, but I don't know which car they are being brought 10 because as I told you, they are the first one, they are 11 being brought to the car by nationality.</b> 12 Q. Had they been taken to a car before you or were they 13 after you? 14 <b>A. They go first.</b> 15 Q. They went first. After you are in the cars at the BdV 16 when you are in the car at the BdV what happened next? 17 <b>A. Please repeat?</b> 18 Q. When you are in the car at the BdV, you are now in the 19 car what happens next? 20 <b>A. They formed the Landcruiser facing towards the fence on 21 the guardhouse.</b> 22 Q. So if we put the cursor on again you tell us where it 23 is, so by the guardhouse fence, do you mean somewhere 24 around here? Is that the right place? 25 <b>A. Yes, yes.</b></p> <p style="text-align: center;">Page 20</p>

<p>1 Q. Then what happened?</p> <p>2 <b>A. And then the car starts to run down on the fence.</b></p> <p>3 Q. To -- sorry, I missed that, go down the fence?</p> <p>4 <b>A. Run down the fence, it starts to break the fence, the</b></p> <p>5 <b>steel fence with the Landcruiser.</b></p> <p>6 Q. So --</p> <p>7 <b>A. And they --</b></p> <p>8 Q. -- can we just be exact about where on the fence this</p> <p>9 was?</p> <p>10 <b>A. It was near in the guardhouse that we are being -- where</b></p> <p>11 <b>we hid, it's here in the back.</b></p> <p>12 Q. Back at the guardhouse, so if the cursor moves --</p> <p>13 somewhere there?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Was the gate closed or open? The vehicle gate, did you</p> <p>16 see it? Did you see the vehicle gate?</p> <p>17 <b>A. I never noticed that one because I was lying on the</b></p> <p>18 <b>floor.</b></p> <p>19 Q. So the Landcruiser broke down the fence?</p> <p>20 <b>A. Yes, ma'am.</b></p> <p>21 Q. Are you able to say what route it then took?</p> <p>22 <b>A. Excuse me?</b></p> <p>23 Q. Are you able to say which route it took, where did it go</p> <p>24 next?</p> <p>25 <b>A. On the rough road.</b></p> <p style="text-align: center;">Page 21</p>	<p>1 across the desert?</p> <p>2 <b>A. That crossing on the road.</b></p> <p>3 Q. Not on the road. If you just say left or right, up or</p> <p>4 down they'll move the little right arrow.</p> <p>5 <b>A. Excuse me?</b></p> <p>6 Q. If you say left or right or up or down they'll move the</p> <p>7 right arrow to where you need it.</p> <p>8 <b>A. To the left.</b></p> <p>9 Q. To the left?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. Then where?</p> <p>12 <b>A. No, too much.</b></p> <p>13 Q. Too far, okay.</p> <p>14 <b>A. Too much.</b></p> <p>15 Q. And from there where did it go?</p> <p>16 <b>A. Heading towards the CPF.</b></p> <p>17 Q. So did it go parallel to the road but on the desert or</p> <p>18 where was it?</p> <p>19 <b>A. No, going straight.</b></p> <p>20 Q. Mr Balmaceda, in front of you are some big sheets. What</p> <p>21 I want to ask you to do is using your finger to show me</p> <p>22 first of all the route the car took and then I'll ask</p> <p>23 you to turn round -- if you show me and the coroner and</p> <p>24 then I'll ask you to turn round and show everybody else</p> <p>25 the same route. So can you show first of all towards</p> <p style="text-align: center;">Page 23</p>
<p>1 Q. On the ramp road?</p> <p>2 THE CORONER: Rough road did you say?</p> <p>3 <b>A. Rough road.</b></p> <p>4 MS DOLAN: So if I show you another picture can you show us</p> <p>5 which way the car went, if you are able to.</p> <p>6 Mr Balmaceda, if you tell the gentlemen with the cursor</p> <p>7 they'll move it where you tell them to move it to show</p> <p>8 the route that you took. So where do you want it to go?</p> <p>9 <b>A. Towards the road.</b></p> <p>10 Q. Towards the road, up?</p> <p>11 <b>A. Up, more.</b></p> <p>12 Q. More up?</p> <p>13 <b>A. Stop, stop. It's too much.</b></p> <p>14 Q. It went that way. And then what happened?</p> <p>15 <b>A. Then when I start to look on the front of the vehicle</b></p> <p>16 <b>it's heading towards the CPF.</b></p> <p>17 Q. Heads towards the CPF. So it would have to turn which</p> <p>18 way, the car would go which way?</p> <p>19 <b>A. Left.</b></p> <p>20 Q. Across the desert or did it stay on the road?</p> <p>21 <b>A. No, it was on the desert.</b></p> <p>22 Q. So it went left. If I give you a bigger picture can you</p> <p>23 show us the route that you remember the car taking,</p> <p>24 please? Does that help you, Mr Balmaceda, to tell us</p> <p>25 which way the car went? So from there you say it went</p> <p style="text-align: center;">Page 22</p>	<p>1 the coroner and me the route you took?</p> <p>2 <b>A. (Indicated)</b></p> <p>3 Q. Mr Balmaceda, what you are indicating is a route that</p> <p>4 follows the road but is off the road to the left-hand</p> <p>5 side?</p> <p>6 <b>A. Yes, yes.</b></p> <p>7 Q. But is following the same route as the road?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. But is not on the road?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. Is that correct?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. All the way. And how far did your car get? If it helps</p> <p>14 to point on the map please do.</p> <p>15 <b>A. Near the operation lay down yard.</b></p> <p>16 Q. Can you point on the map and show the coroner?</p> <p>17 <b>A. Here (Indicated).</b></p> <p>18 Q. He's pointing there. (Indicated)</p> <p>19 THE CORONER: Can you just turn that round so everybody can</p> <p>20 see where you have put your finger. (Indicated)</p> <p>21 MS DOLAN: So it was somewhere near there. You can put that</p> <p>22 down now.</p> <p>23 THE CORONER: It is just above the square that says</p> <p>24 "Compression Project lay down yard", the label that has</p> <p>25 been put on, you are saying just sort of above that and</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 slightly to the left. I am just saying that so it is 2 clear on the transcript where you have shown us. 3 MS DOLAN: And what happened? 4 <b>A. Because our cars stopped and after that I heard 5 explosion.</b> 6 Q. So you said your car stopped and then you heard an 7 explosion? 8 <b>A. Yes.</b> 9 Q. What happened next? 10 <b>A. When I look around our car was a wreck and I did not see 11 the other personnel. They only left, it was Bhong 12 Santiago who was already dead.</b> 13 Q. What happened next? 14 <b>A. Then I saw first Iain Adamson coming on my way and 15 Stephen McFaul. I said "I'm alive, can you remove the 16 tie on my hand?"</b> 17 Q. Can I show you another photograph and you see if you can 18 identify where you were when the vehicle stopped and 19 when you saw Ian and Stephen. Do you recognise where 20 this picture is? 21 <b>A. Yes.</b> 22 Q. Are you able to show on there the position your vehicle 23 ended up? If you point with your finger we will put the 24 cursor on the place. 25 THE CORONER: This is where your vehicle ended up, yes? Page 25</p>	<p>1 is keep in English, all right? It is quite all right 2 for you to shout in his ear. That's not a problem. 3 WITNESS ASSISTANT: Okay. 4 THE CORONER: That is not a problem. It is just if you go 5 into another language I don't know what you are saying 6 and I am sure you are excellent in that language and in 7 English but I have no way of knowing that. That's the 8 problem. 9 WITNESS ASSISTANT: Sorry, sir. 10 THE CORONER: You don't have to be at all but just shout in 11 English into his ear. 12 WITNESS ASSISTANT: Okay. 13 THE CORONER: Thank you very much. 14 WITNESS ASSISTANT: Thank you so much. 15 THE CORONER: All right let's do it that way. 16 MS DOLAN: After Iain Adamson and Stephen McFaul had come to 17 see you did you see anybody else? 18 <b>A. Yes.</b> 19 Q. Who did you see? 20 <b>A. Angelito.</b> 21 Q. Where did you see Angelito? 22 <b>A. He was brought to me by Iain Adamson.</b> 23 Q. So had Angelito been in your car? 24 <b>A. No, he was on the other car.</b> 25 Q. Did you see where the other car was? Page 27</p>
<p>1 <b>A. (Indicated)</b> 2 THE CORONER: Can you just turn that round so everybody can 3 see that? 4 MS DOLAN: Mr Balmaceda, if you look on the screen where the 5 cursor is, if you look on the screen, if you look just 6 below it there's a black mark. Do you think that might 7 be your vehicle then? 8 THE CORONER: Could that be your vehicle, could that be 9 where it was? 10 <b>A. I think so.</b> 11 THE CORONER: Ms Dolan has just raised the question of 12 whether the gentleman should take an interpreter's oath. I 13 have no idea if he is qualified as an interpreter and there 14 are a number steps before we get to that. I had 15 understood he was going to speak loudly in his ear for 16 which no qualifications are required. 17 Can you understand the English? I know you can't 18 hear everything very well. Which is your best ear or 19 are they both bad? Do you have a bad ear and a good one 20 or are they both difficult? 21 <b>A. Both very difficult.</b> 22 THE CORONER: Both very difficult. Can you understand the 23 English all right? 24 <b>A. Yes.</b> 25 THE CORONER: You can. What I really want to do if we can Page 26</p>	<p>1 <b>A. I don't know where his car is.</b> 2 Q. Did you see any other cars? 3 <b>A. Yes. The other car was, some have burns, some have 4 rolled down on the ground.</b> 5 Q. Where was that? Can you show us on the picture in front 6 of you any other car you saw, whereabouts? 7 <b>A. This one and this one. (Indicated)</b> 8 Q. Can you just show me where you are pointing and then -- 9 <b>A. This one.</b> 10 Q. And? 11 <b>A. And this one. (Indicated)</b> 12 Q. Mr Balmaceda is pointing immediately to the two black 13 marks on the map that other people have identified as 14 cars. 15 Tell us about the one at the top of the picture, 16 tell us what you could see of that? 17 <b>A. This one?</b> 18 Q. Yes. Tell us, what could you see? 19 <b>A. I saw coming out from this car is Iain Adamson, Stephen, 20 Ruben Andrada.</b> 21 Q. Did you see them come out of the car or did they tell 22 you they had? 23 <b>A. They came from this car.</b> 24 Q. So you saw them come out of the car? 25 <b>A. Because I saw Ruben.</b> Page 28</p>

<p>1 Q. And what did Ruben do? You said you saw Ruben, what was 2 he doing when you saw him? 3 <b>A. He was walking out from this car.</b> 4 Q. Where did he go when he came out of the car, what 5 direction did he go? 6 <b>A. He's heading towards on my direction.</b> 7 Q. He came? 8 <b>A. He's heading towards my direction here.</b> 9 Q. Did you watch him from when he came out of the car until 10 he reached you all of the time? Could you see him all 11 of the time? 12 <b>A. Yes, I saw him because when I saw him coming in my 13 direction I start to run, going here (indicated). 14 That's why I --</b> 15 Q. You are indicating you are started to run south? 16 <b>A. Yes, coming from here, that's why I saw Stephen Green on 17 this part being -- he's lying on the ground.</b> 18 Q. Sorry, you saw who? 19 <b>A. Stephen Green.</b> 20 Q. You saw Stephen Green where, can you hold up the map and 21 point? 22 <b>A. On this side (indicated).</b> 23 Q. And you are pointing to -- can you turn it round so 24 everybody else can see as well? 25 <b>A. On this side.</b></p> <p style="text-align: center;">Page 29</p>	<p>1 car, how close? How close was he? 2 <b>A. He's not so close because when I start to walk and 3 run --</b> 4 Q. Sorry, I thought you were pointing to close to your car. 5 Show me again on the map where your car was and where 6 you saw the person you thought was Stephen. So that is 7 where your car was? 8 <b>A. And I saw Stephen Green here. (Indicated)</b> 9 Q. And you are pointing on that map about a centimetre and 10 a half south of the car. Could you see any injuries to 11 that man? Could you see any injuries to that man? 12 <b>A. Injuries?</b> 13 Q. Injuries to him. 14 <b>A. Yes, I saw Angelito.</b> 15 Q. No, to the man you tell us was Stephen Green, could you 16 see any injuries? 17 <b>A. No, I didn't see any injuries.</b> 18 THE CORONER: So he was lying on the ground and he looked as 19 if he was uninjured? 20 <b>A. Yes.</b> 21 THE CORONER: Was there anything nearby him or was he just 22 on his own? 23 <b>A. Yes, I just noticed him. I only noticed Stephen Green 24 there.</b> 25 THE CORONER: Was there anything near him?</p> <p style="text-align: center;">Page 31</p>
<p>1 Q. So you are pointing to the side and you say you saw 2 Stephen Green there? 3 <b>A. Yes. I saw him, he's lying on the ground straight but 4 I don't know if he is alive or dead because I cannot 5 determine, I'm not a doctor.</b> 6 Q. How well did you know Stephen Green? 7 <b>A. Because when we are on the -- we are going to take 8 a flight the liaison officer starts to call by the name. 9 That's why we know everybody because we are only 10 sometimes 12, 15 on the flight.</b> 11 Q. So you had seen him on the flight? 12 <b>A. It's also on the bus, on the bus when we are taking.</b> 13 Q. Had you worked with him? 14 <b>A. No but I oftenly see him.</b> 15 Q. What was it that you saw? So what position was he in? 16 <b>A. He's lying on the ground.</b> 17 Q. On his front or on his back? How was he lying? 18 <b>A. Back.</b> 19 Q. How sure are you that that was Stephen Green? 20 <b>A. He's so familiar with me because as I told you when we 21 are going out for vacation the liaison officer starts to 22 call by the name. That was the first time. Then after 23 that, on the airport they'll call by the name again, so 24 it's so familiar with us.</b> 25 Q. So you are describing this person as very close to your</p> <p style="text-align: center;">Page 30</p>	<p>1 <b>A. No.</b> 2 THE CORONER: Nothing at all? 3 MS DOLAN: Can you describe what Stephen Green looked like, 4 not at that time, when you knew him or saw him on the 5 plane? 6 <b>A. Bald, well-built.</b> 7 Q. Well-built? 8 <b>A. Well-built body.</b> 9 Q. Well-built body and bald? 10 <b>A. (The witness nodded)</b> 11 Q. Sir, I wonder if we should put photographs of Mr Green 12 up? 13 THE CORONER: Yes, do that. 14 MS DOLAN: It is going to take a moment to find a photograph 15 so I wonder if we should have a break in any event. 16 THE CORONER: It may be we will be able to show you some 17 photographs of some people. There may be one, there may 18 be more than one but it will just take a minute to 19 arrange, all right. So we are going to have a break for 20 15 minutes. Okay. 21 <b>A. Okay.</b> 22 THE CORONER: Good. 23 (11.00 am) 24 (A short break) 25 (11.15 am)</p> <p style="text-align: center;">Page 32</p>



<p>1 MS DOLAN: Thank you, Mr Balmaceda. I am going to show you 2 some photographs and want you to tell us if you know who 3 the man in each photograph is. Most of them will come 4 up on the screen. One I am going to give you on paper. 5 Can we have the first photograph. Do you know this 6 gentleman? 7 <b>A. No.</b> 8 Q. Just for the tape that is a picture of Carlos Estrada. 9 I am going to hand you a photograph of another man. 10 (Handed). Do you know this man? 11 <b>A. No.</b> 12 Q. Again, for the tape this is a picture that the family 13 provided today of Carson Bilsland. Can I have the next 14 photograph, please. This next one will be on the screen. 15 Do you know this man? 16 <b>A. Carl.</b> 17 Q. Carl? Where did you know him from? 18 <b>A. On the plant.</b> 19 Q. On the? 20 <b>A. The plant.</b> 21 Q. At the plant. So did you work with him sometimes? 22 <b>A. No, I just saw him.</b> 23 Q. You just saw him. For the tape that is a picture of 24 Carson Bilsland. That is Carson Bilsland. 25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 33</p>	<p>1 <b>A. Kenneth Whiteside.</b> 2 Q. And the next picture? 3 <b>A. Stephen Green.</b> 4 Q. And I think there's one more or is that the last one? 5 That was the last picture. Can I just ask you -- I am 6 going to go through those pictures again and I just want 7 you to tell me which of those men you saw when you were 8 a hostage. Okay. So we will just go back to the 9 beginning again if we can. 10 THE CORONER: Did you hear that question? Do you know what 11 you are doing? 12 <b>A. Yes.</b> 13 THE CORONER: You do. 14 MS DOLAN: Have you ever seen this man? 15 WITNESS ASSISTANT: Have you ever seen this man? 16 <b>A. Mmm.</b> 17 MS DOLAN: And the next one, you knew that was Carson? 18 <b>A. Yes.</b> 19 Q. Did you see him when he was a hostage? 20 <b>A. Yes.</b> 21 Q. And when did you last see him? 22 <b>A. When he is going to the men's room.</b> 23 Q. And then the next one. 24 <b>A. (The witness nodded)</b> 25 Q. Did you see Garry when you were a hostage?</p> <p style="text-align: center;">Page 35</p>
<p>1 Q. Does that mean anything to you now you hear it or -- 2 <b>A. Because the Filipino guys remember this one, we call him</b> 3 <b>the spider man because he's always wearing a harness and</b> 4 <b>ropes.</b> 5 Q. Can I have the next picture please? 6 <b>A. Garry.</b> 7 Q. That is a picture of Garry Barlow. The next picture 8 please? 9 <b>A. Thomas ... Thomas.</b> 10 Q. Where do you think you knew him from, did you see him? 11 <b>A. In the office.</b> 12 Q. Which office? 13 <b>A. IBO building.</b> 14 Q. The IBO building. 15 THE CORONER: Sorry, did you say Thomas? 16 <b>A. (The witness nodded)</b> 17 THE CORONER: Could you just ask him please to repeat who he 18 said that was. I can't hear. 19 WITNESS ASSISTANT: Did you say Thomas? 20 <b>A. Thomas.</b> 21 THE CORONER: Thank you. 22 MS DOLAN: Again for the tape that is a picture of Seb John. 23 I am going to show you the next picture. 24 <b>A. Paul Morgan.</b> 25 Q. That is Paul Morgan, and the next picture?</p> <p style="text-align: center;">Page 34</p>	<p>1 <b>A. Yes.</b> 2 Q. Where did you see him? 3 <b>A. When we are being transferred to the fountain in front</b> 4 <b>of the canteen.</b> 5 Q. When did you last see him? 6 <b>A. When we are being brought to the circle, circle, forming</b> 7 <b>a circle.</b> 8 Q. When I asked you earlier in your evidence who you had 9 seen at the BdV you didn't mention Garry then. Are you 10 sure you saw him there? 11 <b>A. Excuse me?</b> 12 Q. Are you sure you saw him there? You didn't mention him 13 earlier when I asked you who you had seen at the BdV. 14 <b>A. Yes.</b> 15 Q. The next picture please. Again, this man. Do you 16 recall seeing him at all? 17 <b>A. (The witness shook head)</b> 18 Q. Just for the tape you shook your head there. And then? 19 <b>A. That was Paul Morgan.</b> 20 Q. You know that's Paul Morgan. Did you see him when you 21 were a hostage? 22 <b>A. No.</b> 23 Q. And then the next one? 24 <b>A. Kenneth Whiteside.</b> 25 Q. Did you see him when you were a hostage?</p> <p style="text-align: center;">Page 36</p>

1 **A. Yes.**  
 2 Q. Where did you see him?  
 3 **A. On the fountain also, at the circle.**  
 4 Q. When did you last see him?  
 5 **A. When we were being distributed on the Landcruiser.**  
 6 Q. And then I think the next one is Stephen Green. When  
 7 you were at the BdV when was the last time you saw  
 8 Stephen at the BdV?  
 9 **A. Excuse me?**  
 10 Q. When was the last time you saw Stephen at the BdV?  
 11 **A. When we are being called by the terrorists to form in**  
 12 **a circle.**  
 13 Q. What was he wearing when you last saw him at the BdV?  
 14 **A. I don't remember any more.**  
 15 Q. And the man you saw later after the car explosion on the  
 16 ground, what was he wearing?  
 17 **A. He's wearing carrier pants.**  
 18 Q. Pants, what kind of pants?  
 19 **A. Brown pants.**  
 20 Q. Anything more about the pants you can remember?  
 21 **A. I don't remember because the four hostages were in a**  
 22 **space.**  
 23 THE CORONER: I just want to be clear. Do we need the  
 24 picture any more?  
 25 MS DOLAN: No.

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1 THE CORONER: He was wearing, did you say -- by brown pants  
 2 do you mean brown trousers?  
 3 **A. Pants, yes.**  
 4 THE CORONER: The same as trousers?  
 5 **A. I don't really remember any more.**  
 6 THE CORONER: Where did they come down to? How far down his  
 7 legs did the trousers go, the pants go? Can you shout  
 8 that in his ear for me?  
 9 WITNESS ASSISTANT: I am sorry, can you hear that -- repeat  
 10 that again.  
 11 THE CORONER: Yes. What you called brown pants, did they  
 12 cover all his legs?  
 13 **A. Yes.**  
 14 THE CORONER: They did? All right.  
 15 MS DOLAN: I want to go back to the account you were telling  
 16 us. After you had seen the man lying on the floor what  
 17 happened next? What happened next?  
 18 **A. When I saw?**  
 19 Q. You told us you had seen the man lying on the floor to  
 20 the south of where you were. First of all, how far away  
 21 from you was he?  
 22 WITNESS ASSISTANT: How far are you from this man lying on  
 23 the map?  
 24 **A. Because I passed by.**  
 25 MS DOLAN: So you walked by him or ran by him?

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1 **A. Ran, ran.**  
 2 Q. How long did you see him for?  
 3 **A. A couple of seconds only.**  
 4 Q. Did you stop at all as you ran by him? Did you stop as  
 5 you ran by him?  
 6 **A. No.**  
 7 Q. And where did you run to?  
 8 **A. Heading over to the BdV.**  
 9 Q. You ran to the BdV?  
 10 **A. Going to the -- towards.**  
 11 Q. Towards. How far did you get?  
 12 **A. Around 200 metres.**  
 13 Q. And then what happened?  
 14 **A. I was being saw by the forces and they told me to lie**  
 15 **down on the ground and roll so that I can get to their**  
 16 **position.**  
 17 Q. And while you were running what else was happening?  
 18 **A. I saw the soldiers are firing.**  
 19 Q. Was anybody firing at the soldiers. You said the  
 20 soldiers were firing?  
 21 **A. Yes.**  
 22 Q. Was anybody firing at the soldiers?  
 23 **A. I did not look back, but I'm sure the soldiers are**  
 24 **firing.**  
 25 Q. I think then they took you to safety?

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1 **A. Yes.**  
 2 Q. And then they took you for medical treatment?  
 3 **A. Yes.**  
 4 MS DOLAN: Mr Balmaceda, thank you very much for telling us  
 5 the story. I know it is difficult to come here.  
 6 I don't have any more questions to ask you but some of  
 7 the other barristers will have some questions to ask you  
 8 next.  
 9 Questions from Mr OWEN-THOMAS  
 10 MR OWEN-THOMAS: Mr Balmaceda, my name is Owen-Thomas, and  
 11 I ask questions on behalf of David Green, the father of  
 12 Stephen Green.  
 13 Firstly, he wishes to thank you for coming today,  
 14 all this way to give this evidence.  
 15 **A. It's my pleasure.**  
 16 Q. And what Mr Green wants to know as much detail as he can  
 17 about those last days in Algeria for Stephen. So that's  
 18 why I ask these questions of you.  
 19 You have been asked to identify Stephen Green by way  
 20 of a photograph?  
 21 **A. Yes.**  
 22 Q. And I notice you answered straight away, I take it you  
 23 have no doubt in your mind as to what Stephen looked  
 24 like?  
 25 **A. Yes.**

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1 Q. You have described how when you travelled from, I think  
2 it must have been the airport to In Amenas a liaison  
3 officer would call out a roll call at the start; is that  
4 right?  
5 **A. Yes.**  
6 Q. Would they call names and people would indicate that  
7 they were there?  
8 **A. Yes.**  
9 Q. So it was the liaison officer who called out the name  
10 and the person would respond with "Yes" or "I'm here"  
11 or?  
12 **A. Excuse me, and we made also a character of**  
13 **Stephen Green, that's why he's so familiar with the**  
14 **Filipino guys because he always wear dark glasses.**  
15 **That's why we call him the enemy of The Matrix, excuse**  
16 **me, the enemy of Neo. He looked like that way. That's**  
17 **why he's so familiar with us.**  
18 Q. I am not a film buff so I don't know, I am afraid. I'm  
19 probably the only one in the room who doesn't.  
20 THE CORONER: There are at least two.  
21 MR OWEN-THOMAS: So you have described some dark glasses,  
22 right? Sunglasses, is that right?  
23 **A. Yes.**  
24 Q. And when the liaison officer would call out  
25 "Stephen Green" the man who you have seen the photograph

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1 of, in the dark glasses, would indicate his presence,  
2 okay, thank you very much.  
3 How often were you with Stephen when that process  
4 happened? You are on the bus, the name is being called  
5 out?  
6 **A. Because I sometimes think we had four or five trips like**  
7 **together with Stephen Green.**  
8 Q. So several times at least?  
9 **A. Yes.**  
10 Q. Four or five times that happened. You have mentioned  
11 a number of other people, some of whom you have now been  
12 shown photographs of, some of whom you haven't, so can  
13 I just ask you, please, about Mr Adamson first of all.  
14 How well did you know Iain Adamson?  
15 **A. He is my line supervisor when I was working on the**  
16 **maintenance.**  
17 Q. So does that mean you saw him every day that you were in  
18 In Amenas?  
19 **A. Yes, because I make a report every day to him.**  
20 Q. Then Stephen McFaul. How well did you know  
21 Stephen McFaul?  
22 **A. When we are in the office and we really know each other,**  
23 **when I saw him passing by during that day.**  
24 Q. So every day would you say?  
25 **A. No, no, the day that happened, on the 17th.**

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1 Q. Was that the first time you knew who --  
2 **A. No I knew him in the office.**  
3 Q. Then a gentleman called Nick Hitch. How familiar were  
4 you with Nick Hitch?  
5 **A. I saw only Nick Hitch on the circle when we are being**  
6 **brought in the front of the canteen and the English guy,**  
7 **the terrorist guy who was speaking English gave the**  
8 **phone to Nick Hitch and I don't know who is talking on**  
9 **the other line but Nick Hitch was talking on the phone.**  
10 Q. Do you recall what Mr Hitch was saying on the phone?  
11 **A. They said that you need to tell to the, the one who's**  
12 **talking that they must pull out the Algerian troops.**  
13 Q. That's what Nick Hitch was saying?  
14 **A. No, that was ordered by the --**  
15 Q. That was the order given to Nick Hitch. And did  
16 Mr Hitch repeat that on the telephone?  
17 **A. I think so.**  
18 Q. Finally, you have mentioned Ruben Andrada.  
19 **A. Ruben.**  
20 Q. How well did you know Ruben?  
21 **A. On that day also.**  
22 Q. Was that the first time you'd met him?  
23 **A. Yes.**  
24 Q. Can you tell me a little bit about what Ruben Andrada  
25 looks like? About how old is he?

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1 **A. I don't know, middle of 45 to 40 something.**  
2 Q. Does he have any facial hair, a beard or a moustache?  
3 **A. He has eye glasses.**  
4 Q. He has eye glasses. A moustache or beard? No, not at  
5 all?  
6 **A. No moustache.**  
7 Q. Have you spoken to Mr Andrada since this attack?  
8 **A. No.**  
9 Q. And you hadn't spoken to him before 16 January 2013; is  
10 that right?  
11 **A. We know only Ruben when he is being also a hostage.**  
12 Q. I understand this morning you listened to a tape of an  
13 interview with someone and who did you identify that --  
14 the person speaking on the tape to be?  
15 **A. Yes, it was Ruben.**  
16 Q. Obviously it appears then that your contact with  
17 Mr Andrada with Ruben was fairly limited. How sure are  
18 you that the person on the tape was Ruben?  
19 **A. We met in the Philippines.**  
20 Q. Okay, before or after the attack?  
21 **A. After.**  
22 Q. Do you remember when you met him? Was it last year or  
23 this year?  
24 **A. March 2013.**  
25 Q. Did you make a point of trying to find him because you

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<p>1 had both been involved in this attack?</p> <p>2 <b>A. Yes. He tried to call me and he told me that we met</b></p> <p>3 <b>in -- near in the place.</b></p> <p>4 Q. He asked you to meet up with him, did he?</p> <p>5 <b>A. Mmm.</b></p> <p>6 Q. And you spoke to him?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. And you spoke about the attack?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. I assume, is that right? In your conversations with</p> <p>11 Ruben did you talk about his journey in the convoy to</p> <p>12 the CPF?</p> <p>13 <b>A. He just told me that after the car rolled down he's</b></p> <p>14 <b>pretending that he's also one of the, that he has died</b></p> <p>15 <b>because some of the bodies were being on -- on Ruben.</b></p> <p>16 Q. They were lying on him?</p> <p>17 <b>A. Yes, he pretended he's dead and then because Ruben told</b></p> <p>18 <b>me that he lost his eye glasses so he just only use his</b></p> <p>19 <b>hearing and when he saw somebody -- talking, getting out</b></p> <p>20 <b>of the car, and when he did not hear any more talking</b></p> <p>21 <b>near him, he starts to get out.</b></p> <p>22 Q. So I have understood that. He could hear the terrorists</p> <p>23 talking to each other?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. Did he mention which language they were speaking?</p> <p style="text-align: center;">Page 45</p>	<p>1 <b>A. Stephen McFaul, Nick Hitch, Iain Adamson and him.</b></p> <p>2 Q. Did he mention anyone else?</p> <p>3 <b>A. The terrorist who was driving in the vehicle.</b></p> <p>4 Q. One terrorist -- any other terrorists in the vehicle did</p> <p>5 he mention?</p> <p>6 <b>A. He just only remembered the guy, the one who was</b></p> <p>7 <b>speaking in English.</b></p> <p>8 Q. And that was someone distinct, someone different from</p> <p>9 the driver?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. Did he say if he had seen anyone who was dead?</p> <p>12 <b>A. I don't remember.</b></p> <p>13 Q. Did you and Ruben discuss in March 2013 anything else</p> <p>14 about the attack?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. What did you discuss?</p> <p>17 <b>A. He knew me that I am one of the survivors because</b></p> <p>18 <b>Iain Adamson told to Ruben, "You need to talk to your</b></p> <p>19 <b>colleague, the same language", that's what Ruben told me</b></p> <p>20 <b>when I was on the stretcher, "Hey Buddy, you can make</b></p> <p>21 <b>it", in our language. Then after that we met in Algiers</b></p> <p>22 <b>hospital.</b></p> <p>23 Q. I was going to come to that actually later but since you</p> <p>24 have mentioned it I will ask you about it now if I may.</p> <p>25 So you and Ruben were in the same hospital together in</p> <p style="text-align: center;">Page 47</p>
<p>1 <b>A. In English.</b></p> <p>2 Q. They were speaking in English. And I think you said</p> <p>3 when they stopped talking, when there was no more noise</p> <p>4 he then decided that was the right time to get out?</p> <p>5 <b>A. He decided to get out.</b></p> <p>6 Q. Did he give you any sense of how long that was between</p> <p>7 the car overturning and his leaving the vehicle?</p> <p>8 <b>A. Because on his story he told me when he get out on the</b></p> <p>9 <b>(inaudible) because he don't have any sleeper and his</b></p> <p>10 <b>eyes was blind he saw one guy that, guiding him, guiding</b></p> <p>11 <b>him, "Hey you, come to this way, come to this way", then</b></p> <p>12 <b>he saw, he told me that somebody is firing at his -- and</b></p> <p>13 <b>he know this guy that was the name of Caringal, that was</b></p> <p>14 <b>the story of Ruben. He told me he reached on the</b></p> <p>15 <b>Algerian forces with this guy but later on, he noticed</b></p> <p>16 <b>that guy was already dead.</b></p> <p>17 Q. When you spoke to him in March last year did he mention</p> <p>18 Stephen Green?</p> <p>19 <b>A. Excuse me?</b></p> <p>20 Q. Did Ruben mention Stephen Green?</p> <p>21 <b>A. No.</b></p> <p>22 Q. Did Ruben mention who was in the vehicle with him in the</p> <p>23 convoy to the CPF?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. Who did he tell you he was with?</p> <p style="text-align: center;">Page 46</p>	<p>1 Algiers?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. And again, at that point this was very soon after the</p> <p>4 attack had happened. Did you and him discuss what had</p> <p>5 just happened in hospital?</p> <p>6 <b>A. No, because he's being helped by the Japanese personnel</b></p> <p>7 <b>and he's being -- I don't know where he's being put.</b></p> <p>8 Q. But there was no conversation at all about?</p> <p>9 <b>A. We had a small conversation and he asked me where do you</b></p> <p>10 <b>live? We noticed that we are living in the same region.</b></p> <p>11 Q. Did Ruben mention Stephen Green whilst he was in</p> <p>12 hospital? Did Ruben mention Stephen Green whilst he was</p> <p>13 in hospital in Algiers?</p> <p>14 <b>A. I don't know.</b></p> <p>15 Q. You don't recall did you say?</p> <p>16 <b>A. Excuse me?</b></p> <p>17 Q. Did you say you don't remember?</p> <p>18 <b>A. No.</b></p> <p>19 Q. Can I just now ask you about 16 January. Can you tell</p> <p>20 me, you have told the inquest about hiding in the</p> <p>21 guardhouse?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. From that point onwards can you tell me the first time</p> <p>24 you remember seeing Stephen Green?</p> <p>25 <b>A. First time?</b></p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 Q. Yes, after you have hid yourself in the guardhouse. 2 From that point onwards -- 3 <b>A. Sorry.</b> 4 Q. -- when was the first time you saw Stephen Green? 5 <b>A. At the airport and in the bus.</b> 6 Q. No, no, on the 16th though, thinking about 16 January. 7 After the attack had started we know you have told the 8 inquest that you went to hide in the guardhouse. So 9 what I want to know is when you first saw Stephen Green 10 after you had gone to the guardhouse? 11 <b>A. When they are on -- when they are being also tied up 12 because we are on -- the hostages is done by their 13 nationality because five of us were very near on the 14 VIP, VIP building.</b> 15 Q. Do you remember who Stephen Green was next to when he 16 was tied up by the VIP building? 17 <b>A. I don't remember any more, but I saw the other hostages, 18 as I told you, by their nationality.</b> 19 Q. So you do recall he was with other British people? 20 <b>A. Yes.</b> 21 Q. Do you recall Stephen Green saying anything either to 22 you or anyone else whilst he was tied up with the other 23 British people? 24 <b>A. Excuse me?</b> 25 Q. Did you hear Stephen Green say anything, talk during Page 49</p>	<p>1 <b>centre circle.</b> 2 Q. Once you were at the circle you remember that 3 Stephen Green was there as well? 4 <b>A. Yes.</b> 5 Q. Do you recall a time where the hostages were asked to 6 kneel down in the circle? 7 <b>A. Kneel?</b> 8 Q. Yes, kneel down. 9 <b>A. We did not kneel down.</b> 10 Q. Do you recall Stephen Green speaking to the terrorists 11 to say "I want to see the bullet that's going to kill 12 me" or words to that effect? 13 <b>A. I don't.</b> 14 Q. You don't recall that. Do you recall anyone showing 15 a bit of defiance or standing up to the terrorists at 16 all, do you recall anyone doing that? 17 <b>A. Because I only remember the terrorists told us "If 18 you're going to the circle just raise your hand and go 19 straight to the circle. If somebody will try to escape 20 I will shoot and kill you."</b> 21 Q. You remember when that statement was made by the 22 terrorist Stephen Green was present? He would have 23 heard that, would he? 24 <b>A. He heard that also.</b> 25 Q. I will ask you a little bit more now about the vehicles Page 51</p>
<p>1 that time -- 2 <b>A. No.</b> 3 Q. Did you see Stephen Green being moved to the plaza, the 4 circle? 5 <b>A. Yes.</b> 6 Q. Was he moved on his own or with someone else? 7 <b>A. With the assist because we are being tied up also on our 8 legs.</b> 9 Q. So Stephen had his legs tied as well, did he? 10 <b>A. (The witness nodded)</b> 11 Q. And someone was helping him, pulling him? 12 <b>A. For example, if you want to go to the men's room you 13 will raise your hand and the terrorist will.</b> 14 WITNESS ASSISTANT: Untie you. 15 <b>A. Pull you and then they'll bring you to the men's room.</b> 16 <b>MR OWEN-THOMAS: So when Stephen was moved from the wall 17 outside the VIP block to the circle, to the plaza, did 18 you see him being pulled up by a terrorist or anyone on 19 to his feet?</b> 20 <b>A. No.</b> 21 Q. Did you see him being pulled or moved to the circle? 22 <b>A. When we are on the circle the terrorists decide to cut 23 the cable tie on our legs because we are lots of 24 hostages, that's why they managed to cut the cable tie 25 on our legs and they told us to form a line going to the</b> Page 50</p>	<p>1 in which you were placed and others were placed before 2 you set off to the CPF. I think in answer to questions 3 earlier -- did you see Stephen Green being placed in 4 a vehicle? 5 <b>A. No.</b> 6 Q. Did you see Mr Andrada being placed in a vehicle? 7 <b>A. (The witness shook his head)</b> 8 Q. That is no. The same question with Mr Adamson. Did you 9 see Mr Adamson being placed in a vehicle? 10 <b>A. No.</b> 11 Q. Mr McFaul? 12 <b>A. No.</b> 13 Q. You have told us about your vehicle and who was placed 14 in your vehicle. When you were in the vehicle were you 15 pointing out towards the road outside the BdV? 16 <b>A. Excuse me?</b> 17 Q. When you were in your vehicle could you see out of the 18 front of the BdV through the entrance out into the 19 desert? 20 <b>A. Yes, for a couple of seconds I'm looking back because 21 I tried to hide and cover myself because I'm kneeling 22 down in the vehicle, that's why I do not want to take 23 a risk to put up my head because there's already the 24 soldiers are firing on us.</b> 25 Q. Could you see the Algerian soldiers in that brief time? Page 52</p>

13 (Pages 49 to 52)

1 **A. Yes.**  
 2 Q. Can you describe to me where they were?  
 3 **A. They was on the road.**  
 4 Q. On the road between the CPF and the BdV?  
 5 **A. Mmm.**  
 6 Q. Did they have vehicles actually on the road, on the  
 7 tarmac road?  
 8 **A. I did not notice because I only -- I just only as I told**  
 9 **you, I just only take a couple of seconds to look back.**  
 10 Q. In those couple of seconds did you get a sense of  
 11 whether you were the first vehicle in the line of  
 12 vehicles, the second or anywhere else?  
 13 **A. I think we are on the third or fourth if I'm not**  
 14 **mistaken.**  
 15 Q. You have described how during the convoy you heard  
 16 a helicopter?  
 17 **A. Yes.**  
 18 Q. Did you hear one helicopter, two or can you not say?  
 19 **A. When we are on the circle I saw one helicopter. It kept**  
 20 **on turning and then when we are on the convoy, I saw the**  
 21 **helicopter also.**  
 22 Q. The same helicopter?  
 23 **A. I don't know if it is the same.**  
 24 Q. But --  
 25 **A. But keeps firing on the vehicle.**

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1 Q. Did you get the sense that the vehicle that you were in  
 2 was being hit by bullets fired from the helicopter?  
 3 **A. Excuse me?**  
 4 Q. Did you get the sense that the vehicle you were in was  
 5 being hit by bullets from the helicopter?  
 6 **A. Yes.**  
 7 Q. This might seem a stupid question, but how, was it the  
 8 noise or did you see --  
 9 **A. Because my colleague was being hit.**  
 10 Q. Your colleague was hit?  
 11 **A. Yes, because Bhong Santiago is in front of me. He died**  
 12 **in my arms and he told me that "Hey, Joe Joe I'm being**  
 13 **hit." I told him "No, you can make it. It is just only**  
 14 **a small wound." Then he hold on my hand and after that**  
 15 **he made only a (inaudible) noise and he lost his life.**  
 16 Q. Thank you for telling me that. That is very clear. Did  
 17 you spend the rest of the journey with your head down or  
 18 looking around?  
 19 **A. Mostly my -- if something happened I just take a couple**  
 20 **of seconds to look by. Then after I start to kneel down**  
 21 **and pray then. For example, that when the car starts to**  
 22 **move, so it's unusual so I look up. Then after I --**  
 23 Q. In any of those times when you did look up did you see  
 24 any vehicle in front of you?  
 25 **A. I saw the vehicle on my left and, left side and**

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1 **right-hand side and also the vehicle in the front.**  
 2 Q. And those vehicles were moving?  
 3 **A. Yes.**  
 4 Q. You have explained how your vehicle came to a stop  
 5 before any explosion. Is that right?  
 6 **A. Yes.**  
 7 Q. Do you know what caused your vehicle to stop?  
 8 **A. Because I heard that everybody is screaming. When the**  
 9 **vehicle starts to run everybody's screaming and --**  
 10 **because of the firing, ah, ah, I know that was the**  
 11 **Japanese and the other guy starts to scream. Then after**  
 12 **that became silent. Then the bang exploded, the car**  
 13 **exploded.**  
 14 Q. Do you think the driver of your vehicle was killed, was  
 15 shot?  
 16 **A. I think he's being shot.**  
 17 Q. So your vehicle comes to a halt. As your vehicle stops  
 18 do you see a vehicle in front of you?  
 19 **A. When our vehicle stopped I just saw one Landcruiser**  
 20 **heading towards the CPF.**  
 21 Q. Did you see that vehicle come to a stop?  
 22 **A. (The witness shook head)**  
 23 Q. Did you see that vehicle again after the explosion?  
 24 **A. After?**  
 25 Q. After the explosion?

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1 **A. Yes.**  
 2 Q. In your vehicle?  
 3 **A. Mmm.**  
 4 Q. Can you tell me what you saw of that vehicle in front of  
 5 you after the explosion in your vehicle?  
 6 **A. It was rolled down on to its side and I saw the other**  
 7 **guys coming out from the car.**  
 8 Q. Did you see the vehicle on its roof or on its side?  
 9 **A. Excuse me?**  
 10 Q. Did you see the vehicle on its roof or on its side?  
 11 **A. On its side.**  
 12 Q. Was it on fire?  
 13 **A. Yes.**  
 14 Q. Is that "yes" did you say?  
 15 **A. Yes.**  
 16 Q. Was it on fire from the moment you saw it after the  
 17 explosion?  
 18 **A. No, that was when I saw the vehicle, it's on the side,**  
 19 **I saw that was, a fire.**  
 20 Q. You described seeing some people running from the  
 21 vehicle. First of all you saw, I think you said,  
 22 Mr Adamson and Mr McFaul getting out of that vehicle, is  
 23 that right?  
 24 **A. Yes.**  
 25 Q. You saw that yourself, right in front of you. Did you

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1 see anyone who you thought to be a terrorist leaving the  
 2 vehicle?  
 3 **A. Did?**  
 4 Q. Did you see anyone who you thought to be a terrorist?  
 5 **A. I did not see any terrorist.**  
 6 Q. Did you see anyone run towards the CPF?  
 7 **A. No.**  
 8 Q. You have explained to us that Mr Adamson was the first  
 9 person I think you saw?  
 10 **A. Yes.**  
 11 Q. Or you spoke to after the explosion?  
 12 **A. Yes.**  
 13 Q. Did you watch Mr Adamson all the way from the vehicle in  
 14 front to you?  
 15 **A. No, I just wait for Iain on my place because I still so**  
 16 **nervous and shaky that's why I wait on the back of the**  
 17 **car.**  
 18 Q. I think you said that Iain undid the plastic cuffs that  
 19 were holding your arms together?  
 20 **A. Yes.**  
 21 Q. And then you saw Ruben Andrada; is that right?  
 22 **A. Before then I saw Stephen McFaul.**  
 23 Q. Yes, you explained about Stephen McFaul. Did you see  
 24 Ruben Andrada leaving the vehicle in front of you?  
 25 **A. I saw him from that direction --**  
 Page 57

1 Q. You saw him coming from the vehicle?  
 2 **A. Yes.**  
 3 Q. But not actually --  
 4 **A. Coming out.**  
 5 Q. -- exiting it?  
 6 **A. Yes, but I -- in that direction.**  
 7 Q. Did you see him run towards the CPF, Ruben Andrada run  
 8 towards the CPF?  
 9 **A. No.**  
 10 Q. In your mind he ran directly towards you?  
 11 **A. No, he just only walking.**  
 12 Q. He was walking. At what point did you then start  
 13 running back south towards the BdV?  
 14 **A. When I saw the helicopter and I heard some gunshots, so**  
 15 **I decided to run towards the BdV.**  
 16 Q. Who was with you when you made that decision?  
 17 **A. When I run?**  
 18 Q. Yes. You are on your own, were you?  
 19 **A. Yes.**  
 20 Q. Did you see where Iain Adamson and Stephen McFaul had  
 21 gone to? Did you watch Ian and Stephen McFaul walk away  
 22 from you or run away from you?  
 23 **A. No, I just -- Iain and Stephen just walked because**  
 24 **Iain Adamson told me to take care of Angelito so**  
 25 **I managed to talk to Angelito but he did not respond and**  
 Page 58

1 **I told him lay down on the ground, I removed my jacket**  
 2 **and told him lay down on the ground, I will get some**  
 3 **help.**  
 4 Q. You described how after you started running you saw  
 5 someone lying on the ground on their back?  
 6 **A. Mmm.**  
 7 Q. How far away do you think from the vehicle you were in  
 8 was that person?  
 9 **A. Approximately maybe maximum of 12 to 9 metres, something**  
 10 **like that.**  
 11 Q. Sorry, how many metres?  
 12 **A. 12 metres.**  
 13 Q. 12 metres. Did you run right past him such that if you  
 14 had bent down you would have been able to touch him?  
 15 **A. I passed him when I start to run.**  
 16 Q. And he was -- the person lying on the ground on their  
 17 back was right beside you as you ran past; is that  
 18 right?  
 19 **A. Yes, when I ran.**  
 20 Q. Did you immediately form the impression -- did you  
 21 immediately think "That's Stephen Green"?  
 22 **A. Yes.**  
 23 Q. At that point were how far from him? How far from him  
 24 were you when you thought to yourself "That's  
 25 Stephen Green"?  
 Page 59

1 **A. When I passed by, when I started to run.**  
 2 Q. So is that less than a metre away, is that?  
 3 **A. For me that's what I determined, yes.**  
 4 Q. You have explained to the coroner what you did notice  
 5 about the clothes that this person was wearing. You  
 6 have described brown trousers or brown long pants?  
 7 **A. Mmm.**  
 8 Q. I understand that beyond that you can't remember, you  
 9 didn't notice any other items of clothing?  
 10 **A. Yes, so in my mind that's his face that's why I'm very**  
 11 **sure he is Stephen Green.**  
 12 Q. You told us, I think, I think you didn't stop running?  
 13 **A. No.**  
 14 Q. And I think you said you didn't see any injuries?  
 15 **A. No.**  
 16 Q. What about the trousers, were they undamaged as far as  
 17 you can recall?  
 18 **A. (The witness shook head)**  
 19 Q. You can't recall?  
 20 **A. No.**  
 21 Q. Do you recall who was the first person you told "I've  
 22 seen Stephen Green lying in the desert" after this  
 23 happened?  
 24 **A. Excuse me?**  
 25 Q. Do you remember who the first person is you told "I've  
 Page 60

1 seen Stephen Green lying in the desert"?

2 **A. (Pause) I don't remember that person.**

3 Q. Do you think today is the first time you've discussed

4 the person you saw lying on the floor in the desert?

5 **A. The first time?**

6 Q. Yes.

7 **A. No, somebody asked me who else you saw and what**

8 **happened.**

9 Q. Do you recall who that person was?

10 **A. I don't. Because after that too much people asking me**

11 **about what happened. I don't know the first one I told**

12 **that -- what happened to Stephen Green.**

13 Q. Have you before today told anyone British about what

14 happened to Stephen Green, a policemen or any other --

15 anyone British?

16 **A. My colleague who asked me.**

17 Q. Your colleagues did you say? Who do you mean by your

18 colleagues?

19 **A. The survivors.**

20 Q. Does that include Iain Adamson?

21 **A. I told that one to Iain and I'm very sure that I told**

22 **that also to Ruben and Willy Cruz.**

23 Q. When you mentioned this to Ruben Andrada, to Ruben, did

24 Ruben say anything about Stephen Green in response?

25 **A. No, he just asked me what did you saw, who are the**

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1 **person injured and that's why I told him, because not**

2 **only Stephen Green I saw also like Angelito Manaois, he**

3 **was brought to me by Iain Adamson.**

4 Q. Did Mr Andrada at that point tell you you might be

5 wrong. Did he say "Well, I don't think that could be

6 Stephen"?

7 **A. No.**

8 Q. Forgive me for asking and forgive me, this is

9 a difficult matter for anyone else in the room, but the

10 person you saw lying on the floor was not, I assume, did

11 not look damaged by fire, was not burnt?

12 **A. Excuse me?**

13 Q. The person you saw lying on their back who you thought

14 was Stephen Green was not someone who you thought had

15 suffered any burns?

16 **A. No.**

17 THE CORONER: Can you remember, were his eyes open or

18 closed?

19 **A. Closed.**

20 **MR OWEN-THOMAS: Did you know a gentleman called Rodolfo**

21 **Bathan? Did you know someone called Rodolfo Bathan?**

22 **A. I don't know.**

23 Q. You have explained how you came across the Algerian

24 forces, the Algerian army, and they told you to lie down

25 and you recall that. Between then and the hospital in

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1 Algiers did you discuss anything?

2 **A. Not in Algiers, in In Amenas town hospital first I was**

3 **being brought.**

4 Q. In Amenas hospital indeed, forgive me. Did you discuss

5 what had happened with anyone before you arrived in

6 In Amenas town?

7 **A. Yes. Iain Adamson is with me on the car which brought**

8 **me to the hospital.**

9 Q. Did you mention to Iain Adamson that you had seen

10 Stephen Green lying on the desert?

11 **A. No, I only mentioned to Iain that do you think I will -- I**

12 **can survive because my -- I have a chest pain and back**

13 **pain. I thought I was hit also.**

14 Q. I take it from that Iain didn't discuss with you his own

15 experiences of the convoy?

16 **A. No.**

17 Q. Sir, I wonder, I understand there are others who have

18 questions for Mr Balmaceda. What I would like to do, at

19 some point is to take some proper instructions outside,

20 but in the meantime if I just take some instructions

21 I would be grateful?

22 THE CORONER: Of course, yes.

23 MR OWEN-THOMAS: I am grateful. Mr Balmaceda, thank you

24 very much. I may well have some more questions for you

25 in a moment but others do for you now. Thank you very

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1 much.

2 Questions from MS GOLLOP

3 MS GOLLOP: Good morning.

4 **A. Good morning.**

5 Q. I just have a few questions for you and I am asking

6 those questions for Stephen Green's wife. You

7 understand?

8 **A. Make a loud voice, please.**

9 Q. Make a loud voice, right. Let me see if I can make it

10 a bit louder.

11 Just a couple more questions about the man that you

12 saw lying on the ground in the desert, just a couple

13 more. You have told the judge that this man had his

14 eyes closed?

15 **A. Mmm.**

16 Q. So he didn't have sunglasses?

17 **A. No.**

18 Q. Is it possible that the man you saw was another man with

19 a bald head?

20 **A. No.**

21 Q. What was it that made you think it was the enemy of The

22 Matrix, as you called it? Was it his face or his bald

23 head or something else about him?

24 **A. Because up to this time his face is still on my mind**

25 **that he is the one that I saw on the ground.**

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<p>1 Q. Why is his face on your mind, what was it about his 2 face?</p> <p>3 <b>A. That event it is the event that keeps me awake every 4 time. That's why I told you it's not 100 per cent, it's 5 200 per cent that I saw him.</b></p> <p>6 THE CORONER: Can we just pause for a moment. I thought 7 that it might be that Mr Owen-Thomas would want a break 8 to take instructions. I am just anxious really that he 9 and his client are in for this. MS</p> <p>10 GOLLOP: He is missing this.</p> <p>11 THE CORONER: I am quite happy. Could we just fetch them 12 back and I'll make it plain. I had just assumed he was 13 going to carry on and then at the end of it I was going 14 to be asked to break off for a few minutes but I don't 15 want him to miss this unless there is some reason why he 16 doesn't want to be in. If someone could just please.</p> <p>17 MS GERRY: I had a couple of unrelated questions which --</p> <p>18 THE CORONER: Let us just leave it all and -- Ms Gollop, 19 I am so sorry to interrupt you.</p> <p>20 MS GOLLOP: Not at all.</p> <p>21 THE CORONER: Mr Owen-Thomas, I had thought that we were 22 going to do the other questions and that then we might 23 have a break if you wanted some time to take 24 instructions but I am most anxious that you and your 25 client, if I can put it that way, don't miss any of</p> <p style="text-align: center;">Page 65</p>	<p>1 <b>really the normal rotation. There's a problem on the 2 site. That's why we oftenly meet at the airport.</b></p> <p>3 <b>Sometimes we do six weeks, sometimes we do only two 4 weeks and then we come back. That's why we oftenly meet 5 at the airport and then in Hassi Messaoud base camp.</b></p> <p>6 Q. When you were actually working at the In Amenas plant 7 how often did you see Stephen Green?</p> <p>8 <b>A. How often? In a week for example? In a week I saw 9 maybe three times.</b></p> <p>10 Q. And that would just be passing by him?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Just to walk by?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Did you talk to him?</p> <p>15 <b>A. No.</b></p> <p>16 Q. Did he know your name?</p> <p>17 <b>A. I don't know if he knew my name.</b></p> <p>18 Q. He didn't say "Hello Joe Joe, how are you?" When you 19 walked by him?</p> <p>20 <b>A. No, only like that when we are in the office.</b></p> <p>21 Q. And you mentioned that you had seen him in the bus and 22 you had seen him at the airport. How many times had you 23 seen him on the bus?</p> <p>24 <b>A. On the bus five times.</b></p> <p>25 Q. Had you ever had a long conversation with him?</p> <p style="text-align: center;">Page 67</p>
<p>1 this, all right.</p> <p>2 MR OWEN-THOMAS: That had been my intention, sir.</p> <p>3 THE CORONER: And that's what we'll do, all right. Have you 4 got -- let me just see if I can just come back to what 5 was said. So that Mr Green just catches up.</p> <p>6 Ms Gollop was asking the witness -- in fact, if you 7 have a note of it there it may be you can do it more 8 speedily.</p> <p>9 MR PERFECT: I do have a note of it, sir.</p> <p>10 THE CORONER: We will just take a moment if you just want to 11 bring Mr Green up-to-date and then we'll carry on.</p> <p>12 (Pause)</p> <p>13 MS GOLLOP: We were all just particularly concerned to 14 understand who was where. So I just want to take you 15 back to before the attack and ask you about your 16 relationship with Stephen Green. Just remind us how 17 long you had been working at In Amenas?</p> <p>18 <b>A. Since 2006 I joined the JV.</b></p> <p>19 Q. In 2006 you joined the JV. Did you work with 20 Stephen Green?</p> <p>21 <b>A. No.</b></p> <p>22 Q. Let me go back one step. Did you do three weeks on, 23 three weeks off or four weeks on, four weeks off or 24 a different work pattern?</p> <p>25 <b>A. On 2012, June, the rotation was abnormal, it's not</b></p> <p style="text-align: center;">Page 66</p>	<p>1 <b>A. No.</b></p> <p>2 Q. So you had really never spoken to him?</p> <p>3 <b>A. No.</b></p> <p>4 Q. And you only knew him because from what you said 5 Filipino people like nicknames?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. And so you just knew him only by his face?</p> <p>8 <b>A. Because sometimes on the airport, on the line it is the 9 one we are being called for putting some bag on the 10 baggage, sometimes he is at my back, so I know him.</b></p> <p>11 Q. So that's how you can put the name and the face 12 together?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Earlier you were describing his -- Americans say pants, 15 we say trousers, I think you said they were carrier 16 trousers, did you mean cargo? Did you mean the kind of 17 pants that have pockets on the side?</p> <p>18 <b>A. Yes, yes.</b></p> <p>19 Q. And that's what you saw this person wearing in the 20 desert?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Did you think that the person that you saw in the desert 23 had been put into a different Landcruiser to the 24 Landcruiser that had Stephen McFaul and Iain Adamson and 25 Nick Hitch and Ruben Andrada or the same one?</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

1 **A. I think he is in a different Landcruiser.**  
 2 Q. I want to move on to something different. The  
 3 Landcruiser that you were in, when you were driving from  
 4 the BdV to the CPF were any of the terrorists in your  
 5 Landcruiser shooting guns?  
 6 WITNESS ASSISTANT: Did you see any of the terrorists firing  
 7 guns?  
 8 **A. Yes.**  
 9 MS GOLLOP: Were they firing out of the front windscreen or  
 10 the back windscreen or the side windows?  
 11 **A. From the side windows.**  
 12 Q. What were they firing at? What were they firing at,  
 13 could you see?  
 14 **A. The Algerian military.**  
 15 Q. The soldiers on the ground. Could we have the  
 16 photograph of the road from the BdV to the CPF. Are you  
 17 able to show us -- if it's going to be easier with  
 18 a bigger picture you say, but are you able to show us  
 19 where you saw the soldiers on the ground?  
 20 **A. They was on the road. Some others were on the road and**  
 21 **others on the rough road.**  
 22 Q. Do you mean -- are you able to point at all? If you  
 23 want us to get a closer photograph --  
 24 **A. A little bit closer.**  
 25 Q. Can we zoom in a bit closer to the CPF. If do you want

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1 to find a different photograph that's easier for you to  
 2 show please do. If you look at the screen,  
 3 Mr Balmaceda, were the soldiers actually on the tarmac  
 4 road?  
 5 **A. Yes.**  
 6 Q. Were they standing up or lying down or kneeling?  
 7 **A. I saw kneeling and the others were --**  
 8 WITNESS ASSISTANT: They were like lying on the ground.  
 9 MS GOLLOP: How many did you see?  
 10 **A. Because when we passed by I just only, maybe five or**  
 11 **six.**  
 12 Q. Are you able to stand up and show us on the screen where  
 13 you think they were? It doesn't have to be perfect.  
 14 WITNESS ASSISTANT: He's referring to the soldiers.  
 15 **A. On this side (indicated).**  
 16 MS GOLLOP: Further down.  
 17 **A. Yes.**  
 18 THE CORONER: Can you just describe that so it is on the  
 19 tape?  
 20 MS GOLLOP: It is off the bottom of this picture. Closer to  
 21 the BdV than the CPF?  
 22 **A. Yes, closer, closer. Closer to the BdV. Before on the**  
 23 **main gate.**  
 24 Q. Before the main gate. So the man that you saw lying on  
 25 the desert he was closer to the CPF than the soldiers

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1 that you had seen?  
 2 **A. Excuse me?**  
 3 Q. The man that you saw that you think is Stephen Green  
 4 lying, that body, was closer to the CPF than the  
 5 soldiers that you saw?  
 6 **A. No.**  
 7 Q. That body then, was that by the main gate of the BdV?  
 8 **A. No, he was not on the main gate.**  
 9 Q. I am going to ask you about something completely  
 10 different. When you were taken to the circle, or when  
 11 you were first taken hostage, yes, you have described  
 12 seeing the fat guy with the turban?  
 13 **A. Yes.**  
 14 Q. Was that man wounded when you first saw him?  
 15 **A. No.**  
 16 Q. Did there come a time when he was wounded?  
 17 **A. Repeat again?**  
 18 Q. Later on did there come a time when he was injured?  
 19 **A. I saw him injured on the 17th when we are being formed**  
 20 **in a circle.**  
 21 Q. Can you tell us how he was injured?  
 22 **A. Because his pants were being cut off and he has no shoes**  
 23 **and he has a bandage on his head, a bandage on the knee.**  
 24 Q. Do you know what it was that had injured him?  
 25 **A. Ah --**

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1 Q. Do you know what it was that had injured him? Had he  
 2 been shot or --  
 3 **A. I don't know. I just saw him.**  
 4 MR FERGUSON: Sir, I hesitate to interrupt when this  
 5 important examination of this witness but certain  
 6 information has come to my attention which it had been  
 7 assumed by those who instruct me was in the possession  
 8 of the police which I think may assist Ms Gollop and  
 9 other parties. I wonder if I could create something of  
 10 a hiatus in this witness's evidence.  
 11 THE CORONER: Yes, of course. Just so you know I have to  
 12 stop at 12.50 today but if I just rise now and shall  
 13 I leave it to you for the moment and if you can just get  
 14 a message, if you just do whatever you have to do,  
 15 everybody can see how long they need to assimilate  
 16 whatever it is and then just get a message through and  
 17 we will see where we are.  
 18 MS GOLLOP: Sir --  
 19 MR FERGUSON: Forgive me, I wonder, moving ahead, there was  
 20 a second matter I was going seek to draw to your  
 21 attention, sir, which has the potential to impact upon  
 22 this witness but not necessarily so and I would welcome  
 23 the opportunity to spend, I suspect ten minutes with  
 24 Ms Dolan, if all parties were content, because I am  
 25 trying to facilitate speedy disclosure to them to permit

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1 me to show her and indeed you something and explain its  
 2 provenance. I imagine they would all be grateful once  
 3 I have demystified it.  
 4 THE CORONER: Yes, all right.  
 5 MR FERGUSON: So all of that could take 15 minutes.  
 6 THE CORONER: All right. So we'll break off then. That is  
 7 the best thing to do.  
 8 MS GOLLOP: I only have a couple more questions. I don't  
 9 know if this new disclosure will cause more problems or  
 10 fewer. But I wondered if I just finish what I have  
 11 planned that might just help. It gets us to an end  
 12 point otherwise poor Mr Balmaceda will just wonder  
 13 whether he's coming or going slightly.  
 14 THE CORONER: Yes, that is right.  
 15 MS GOLLOP: Mr Balmaceda, just a couple more points, I am  
 16 very grateful. Some of the hostages had cellphones with  
 17 them while they were taken hostage. Did you have  
 18 a cellphone?  
 19 **A. Yes.**  
 20 Q. Were you able to make calls?  
 21 **A. No.**  
 22 Q. Were you able to send messages?  
 23 **A. (The witness shook his head)**  
 24 Q. Were you asked to speak to anybody on the telephone by  
 25 any of the terrorists?

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1 **A. Excuse me?**  
 2 Q. You weren't forced to speak on the telephone like  
 3 Mr Hitch was, were you?  
 4 **A. No.**  
 5 Q. And while you were held hostage in the circle and before  
 6 who was sitting next to you?  
 7 **A. Raffy Edubane, Bhong Santiago.**  
 8 Q. And can you picture in your mind where Mr Green was?  
 9 **A. Show me some picture and I will show you.**  
 10 MS GOLLOP: I understand. Thank you very much. For the  
 11 moment they are my questions.  
 12 THE CORONER: Mr Owen-Thomas, you needed some time.  
 13 MR OWEN-THOMAS: I would appreciate that.  
 14 THE CORONER: I wanted you to have some time, let me put it  
 15 that way, anyway. We will just break off. What I am  
 16 going to say for the moment. Mr Ferguson, can we do it  
 17 this way, it is a matter for you, is it possible if you  
 18 just brief Ms Dolan for now and then she can come and  
 19 brief me, is that all right? Can we do it that way?  
 20 MR FERGUSON: Yes, of course.  
 21 THE CORONER: What I will say for the moment is 2.05. I am  
 22 assuming everybody is just going to be around for the  
 23 next few moments. If I hear anything that makes me  
 24 think it need to be later than that I will say but for  
 25 the moment let me say 2.05.

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1 (12.30 pm)  
 2 (Luncheon Adjournment)  
 3 (2.05 pm)  
 4 (Proceedings delayed)  
 5 (2.30 pm)  
 6 THE CORONER: Mr Ferguson, just to pick up one of the  
 7 matters that you mentioned before we broke off, and I am  
 8 very grateful to you for raising it, but as I understand  
 9 it the photograph concerned, everybody who needs to has  
 10 seen that, and I think everybody is satisfied that it is  
 11 not going to take us any further, but thank you  
 12 nonetheless for drawing it to all our attention.  
 13 MR FERGUSON: Thank you. May I apologise if it has caused  
 14 any distress at all which is inevitable. I am sorry  
 15 that it arose in this way.  
 16 THE CORONER: Yes, not at all. Understood. So I can't  
 17 remember where we were.  
 18 MS GERRY: Sir, I just have a couple of questions if I may.  
 19 Questions from MS GERRY  
 20 MS GERRY: Mr Balmaceda, I ask questions on behalf of  
 21 Sebastian John's family and I just want to ask you about  
 22 the time you were in the plaza when you were held  
 23 hostage just before the vehicles were brought to the  
 24 plaza area. So this would be on the morning of  
 25 Thursday, 17 January. Do you understand the timeframe

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1 that I am asking you about?  
 2 **A. It is --**  
 3 Q. So you have been taken to the plaza area. You have been  
 4 held overnight and then the following morning at that  
 5 time you were being held together with others and you  
 6 had your hands -- did you have your hands tied at that  
 7 point?  
 8 **A. Yes.**  
 9 Q. Do you remember at that time whether you were with Fred  
 10 Buttaccio, the American?  
 11 **A. Mmm.**  
 12 Q. Were you with him at that time?  
 13 **A. I saw him.**  
 14 Q. You saw him. Did you know somebody called  
 15 Lotfi Benadouda?  
 16 **A. Yes.**  
 17 Q. Did you see him at that time?  
 18 **A. No.**  
 19 Q. Did you see him at all while you were being held  
 20 hostage?  
 21 **A. We -- I see him before.**  
 22 Q. Can you remember when you saw him and where you saw him?  
 23 **A. It was I think on the 16th.**  
 24 Q. On the 16th. So this is the Wednesday?  
 25 **A. Yes.**

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<p>1 Q. And you have told us that you initially hid in the 2 guardhouse. At what point after then did you see Lotfi? 3 <b>A. Excuse me?</b> 4 Q. When did you first see Lotfi on the Wednesday, on the 5 16th? 6 <b>A. When we are being tied up.</b> 7 Q. You described when you were taken hostage that you were 8 coming back into the BdV and the gate was open with 9 people leaving, women leaving, do you remember, and you 10 said that initially the terrorists were not interested 11 in you, they ignored you until they realised Fred was 12 with you, yes, is that right? 13 <b>A. That terrorist asked the sixth man, Fred, what is the 14 nationality, then after that they called us to come back 15 and tied up us.</b> 16 Q. And at that time do you remember whether Lotfi was there 17 at that time? 18 <b>A. No.</b> 19 Q. So when did you see him? 20 <b>A. When we are being put in the front of the BdV 21 accommodation.</b> 22 Q. So when you were put in front of the VIP building? 23 <b>A. Yes.</b> 24 Q. Is that right? And that was on the Wednesday, but you 25 say you did not see him on the Thursday?</p> <p style="text-align: center;">Page 77</p>	<p>1 <b>A. In the contractors' canteen.</b> 2 Q. The contractors' canteen. Is that different from the 3 main canteen? 4 <b>A. Yes.</b> 5 Q. And you were having breakfast with Bhong, Gerry, Raffy 6 and Angel, is that right? 7 <b>A. Yes, correct.</b> 8 Q. And you have told us that you know Kenneth Whiteside? 9 <b>A. I know him.</b> 10 Q. You know him. How long had you known him? 11 <b>A. Three years.</b> 12 Q. Three years. And because you had breakfast in the 13 contractors' canteen there's no chance you saw Kenny 14 when you were having breakfast? 15 <b>A. No.</b> 16 Q. Did you see him at all before you heard gunshots that 17 morning? 18 <b>A. No.</b> 19 Q. Sir, I wondered if we could just have up for a moment 20 the family testimonial photograph of Carson Bilsland, 21 just for a few moments? 22 THE CORONER: Yes. 23 MR FLINN: Mr Balmaceda, we showed this photo to you before 24 and you identified this as someone you know as "Carl", 25 is that right?</p> <p style="text-align: center;">Page 79</p>
<p>1 <b>A. No.</b> 2 Q. When the vehicles were brought to the plaza area before 3 you were put in the vehicles by the terrorists did you 4 see where those vehicles were brought from? 5 <b>A. Excuse me, again, repeat?</b> 6 Q. I will repeat. You said in your evidence I think there 7 were seven vehicles that were brought to where you were 8 being held hostage, yes? Do you know where those 9 vehicles were brought from? 10 <b>A. It came from the garage.</b> 11 Q. It came from the garage. Do you know which garage? 12 <b>A. The garage from the others -- not in the main car park, 13 it is in the contractors' area.</b> 14 Q. So down in the contractors camp area, is that right? 15 And you don't recall Lotfi Benadouda being there at that 16 time when the vehicles were brought? 17 <b>A. No.</b> 18 MS GERRY: Thank you, I have no further questions, 19 thank you. 20 Questions from MR FLINN 21 MR FLINN: Good afternoon, Mr Balmaceda. I am going to ask 22 you a few questions on behalf of the families of 23 Carson Bilsland and Kenneth Whiteside in particular. On 24 16 January early in the morning before you went to get 25 your T card did you have breakfast in the canteen?</p> <p style="text-align: center;">Page 78</p>	<p>1 <b>A. Yes.</b> 2 Q. And you also knew him by the name of "spider man". Sir, 3 if it assists it is my understanding that Carson was 4 called "Carse" by those who knew him well and I have 5 also taken instructions and understand that the name 6 "spider man" whilst not known to the family does not 7 surprise them at all. 8 THE CORONER: Right, thank you. 9 MR FLINN: Mr Balmaceda, did you see Carse at any time 10 before you heard gunshots that morning? 11 <b>A. No.</b> 12 Q. Now -- 13 THE CORONER: That is a "no", is it, you didn't? 14 <b>A. No, I didn't see him.</b> 15 MR FLINN: When you went to the guardhouse to get your 16 T card to do that you went through the pedestrian gate 17 first; is that right? 18 <b>A. Yes.</b> 19 Q. And it was at that point that you first heard gunshots? 20 <b>A. Yes.</b> 21 Q. You didn't see any vehicles coming towards the BdV camp 22 at that time? 23 <b>A. No.</b> 24 Q. Could you see the outer gate on the other side of the 25 car park from where you were standing?</p> <p style="text-align: center;">Page 80</p>

<p>1 <b>A. (The witness shook his head)</b></p> <p>2 Q. When you went into the guardhouse you were with your</p> <p>3 Filipino colleagues and I think you said there was one</p> <p>4 Algerian local person and three guards; is that right?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. And you all hid in the guardhouse?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Do you remember the guards trying to use the radio</p> <p>9 whilst they were in the guardhouse, no?</p> <p>10 <b>A. No.</b></p> <p>11 Q. Do you remember anyone trying to use a telephone from</p> <p>12 the guardhouse?</p> <p>13 <b>A. No.</b></p> <p>14 Q. Do you think that they definitely did not use</p> <p>15 a telephone or a radio or you just don't know?</p> <p>16 <b>A. No, I did not see anything.</b></p> <p>17 Q. You didn't see anything. I would like to ask you some</p> <p>18 questions about the time when you were tied up as</p> <p>19 a hostage. I think you said to Ms Dolan that you left</p> <p>20 your hiding place in the guardhouse at about 11.30 that</p> <p>21 morning; is that right? And was it very soon after that</p> <p>22 that you were tied up?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. When they started to tie you up did you see Carse, the</p> <p>25 spider man, in the area where the hostages were?</p> <p style="text-align: center;">Page 81</p>	<p>1 <b>A. I don't remember.</b></p> <p>2 Q. You can't remember his clothing? Do you remember having</p> <p>3 any conversations with him whilst you were a hostage?</p> <p>4 <b>A. No.</b></p> <p>5 Q. And I think you said to Ms Dolan that the last time you</p> <p>6 remember seeing him was when he went to the men's room?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Is that right? Was that on the first day or the second</p> <p>9 day that you were tied up?</p> <p>10 <b>A. It was on the first day.</b></p> <p>11 Q. The first day. Do you recall seeing him on the second</p> <p>12 day at all?</p> <p>13 <b>A. On the second day, I did not see Carl on the second day.</b></p> <p>14 Q. Thank you. Can you recall what Kenny Whiteside was</p> <p>15 wearing, because I think he was tied up near you as</p> <p>16 well?</p> <p>17 <b>A. (The witness nodded)</b></p> <p>18 Q. Can you recall what he was wearing?</p> <p>19 <b>A. I don't remember.</b></p> <p>20 Q. Were you able to have any conversations with him?</p> <p>21 <b>A. No.</b></p> <p>22 Q. And I think you said to Ms Dolan that the last time you</p> <p>23 recall seeing Kenny was when the hostages were being put</p> <p>24 in the vehicles; is this right?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 83</p>
<p>1 <b>A. Mmm.</b></p> <p>2 Q. You did?</p> <p>3 <b>A. (The witness nodded).</b></p> <p>4 Q. So you remember him being there when you were being tied</p> <p>5 up? Could you say yes or no?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Yes, you do, thank you. Now, some other witnesses have</p> <p>8 said that they remember him coming over to the BdV later</p> <p>9 in the day at around about 4 pm in the afternoon and he</p> <p>10 wasn't there before that. Do you think your memory</p> <p>11 about seeing him when you were first tied up might be</p> <p>12 a mistake?</p> <p>13 <b>A. No.</b></p> <p>14 Q. Would you like me to repeat the question?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Some other people have said that Carse was not in the</p> <p>17 area where the hostages were at about 11.30. They've</p> <p>18 said that he came over to the hostages later at about</p> <p>19 4 pm. Do you think you might be mistaken in remembering</p> <p>20 seeing him when you were first tied up?</p> <p>21 <b>A. No.</b></p> <p>22 Q. You can't help any further with that?</p> <p>23 <b>A. No.</b></p> <p>24 Q. That's fine, I'll move on from that. Can you recall</p> <p>25 what Carse, spider man, was wearing when you saw him?</p> <p style="text-align: center;">Page 82</p>	<p>1 Q. On the second day?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. But you don't know which vehicle Kenny was put into.</p> <p>4 The vehicle you were put into I would just like to</p> <p>5 remind myself of who you remember being in yours so</p> <p>6 I can be clear about it. There was you, Raffy, yes?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Bhong?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. A Malaysian man?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. And I think you said five Japanese people?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. And there was a hostage sitting in the front of the</p> <p>15 vehicle?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Is that right, next to two terrorists?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Can you remember the nationality of that hostage in the</p> <p>20 front row?</p> <p>21 <b>A. Nationality?</b></p> <p>22 Q. Nationality, was it a Japanese person?</p> <p>23 <b>A. Japanese.</b></p> <p>24 Q. It was? So are you quite certain that there were no</p> <p>25 British or American people in your car?</p> <p style="text-align: center;">Page 84</p>

1 **A. No.**  
 2 Q. When you say "no" do you mean you are not sure or you  
 3 are sure that there were not?  
 4 **A. There were not.**  
 5 Q. Thank you very much. Just a very small number of  
 6 questions about the body you saw on the ground with the  
 7 bald head. Can you recall what that body was wearing on  
 8 the upper half?  
 9 **A. I did not focus on the upper half.**  
 10 Q. I understand. So you could not say whether or not it  
 11 had long sleeves?  
 12 **A. No.**  
 13 Q. Thank you very much. Finally, Mr Balmaceda, have you  
 14 been involved in any other investigations into the  
 15 attacks at In Amenas?  
 16 **A. Investigation?**  
 17 Q. Investigations.  
 18 **A. Yes.**  
 19 Q. What investigations were those?  
 20 **A. I was invited by the Japanese authority.**  
 21 Q. By the Japanese authorities. When was that?  
 22 **A. June 3, 2014.**  
 23 Q. In Japan did you speak to the police or was it someone  
 24 from the government?  
 25 **A. From the police.**

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1 Q. Did you give a statement to them?  
 2 **A. Yes.**  
 3 Q. Did they take a written statement from you?  
 4 **A. Yes.**  
 5 MR FLINN: Thank you very much. Thank you very much, sir.  
 6 THE CORONER: Thank you.  
 7 Further questions from MR OWEN-THOMAS  
 8 MR OWEN-THOMAS: Perhaps, sir, I may just ask one or two  
 9 final questions.  
 10 THE CORONER: Of course.  
 11 MR OWEN-THOMAS: Mr Balmaceda, I just want to ask you about  
 12 your contact with Ruben Andrada. Just two questions.  
 13 Did you speak with Mr Andrada between seeing him coming  
 14 walking towards you and when you saw him in the Algiers  
 15 hospital?  
 16 **A. No, I did not speak to him.**  
 17 Q. Did you speak to him between when you saw him in the  
 18 Algiers hospital and March 2013 when you met up with  
 19 him?  
 20 **A. Yes, I speak with him.**  
 21 Q. You did speak to him between those two occasions?  
 22 **A. But in Algiers it was a very small talk, small chat**  
 23 **only.**  
 24 Q. After that when you left Algiers hospital was the next  
 25 time you spoke to him about what happened March?

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1 **A. March.**  
 2 Q. Finally, did Mr Andrada ever say to you that he had seen  
 3 Stephen Green? Did Mr Andrada ever say to you that he  
 4 had seen Stephen Green?  
 5 THE CORONER: He didn't, he never said that. Just so we get  
 6 an answer, he didn't say that?  
 7 **A. Excuse me?**  
 8 THE CORONER: He didn't say to you that he had seen  
 9 Stephen Green?  
 10 **A. Ruben Andrada? No.**  
 11 THE CORONER: He didn't. Right.  
 12 MR OWEN-THOMAS: One final question. Did anyone apply any  
 13 bandages to you to give you some first aid by putting  
 14 a bandage on you?  
 15 **A. Yes.**  
 16 Q. Do you recall who did that?  
 17 **A. Excuse me?**  
 18 Q. Do you recall who did that for you?  
 19 **A. It was in the hospital.**  
 20 Q. Not before the hospital?  
 21 **A. Excuse me.**  
 22 Q. Not before the hospital, no one attended to you with  
 23 first aid by applying a bandage to you before you  
 24 arrived at hospital?  
 25 **A. No.**

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1 **MR OWEN-THOMAS: Thank you.**  
 2 THE CORONER: Thank you very much indeed. That's all.  
 3 Thank you for coming and thank you for helping.  
 4 (The witness withdrew)  
 5 MS DOLAN: Sir, the next witness is Mr Johnston.  
 6 MR OWEN-THOMAS: Sir, if I may, after the evidence of  
 7 Mr Balmaceda this morning my client mentioned to me that  
 8 he would like to have Mr McFaul if possible, have an  
 9 opportunity to comment upon the presence or otherwise of  
 10 the person that Mr Balmaceda says he saw lying in the  
 11 desert. It seems that they followed a similar path and  
 12 were in the same area at the same sort of time and it  
 13 might give Mr Green a little bit of reassurance if  
 14 there's some corroboration or otherwise from Mr McFaul.  
 15 Who otherwise, his evidence ties in very closely with  
 16 that we heard from Mr Adamson and a lot of what we have  
 17 heard from Mr Balmaceda. He would like that if possible  
 18 at the inquest's convenience.  
 19 THE CORONER: We could ask him couldn't we, whether he has  
 20 a comment about anything. He need not necessarily come  
 21 back, need he?  
 22 MS DOLAN: Mr McFaul is here at the moment. His eyebrows  
 23 have gone up because he had no warning about that it  
 24 must be said.  
 25 THE CORONER: We might be able to deal with that now,

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<p>1 mightn't we?</p> <p>2 MR OWEN-THOMAS: I would be very grateful.</p> <p>3 THE CORONER: If Mr McFaul is happy.</p> <p>4 MR STEPHEN MCFAUL (recalled)</p> <p>5 THE CORONER: So sorry to have you back. You took an oath</p> <p>6 or an affirmation before, do you still regard yourself</p> <p>7 bound by that to tell the truth?</p> <p>8 <b>A. I do, yes.</b></p> <p>9 THE CORONER: Take a seat.</p> <p>10 Questions from MS DOLAN</p> <p>11 MS DOLAN: Mr McFaul, I know you have been here and have</p> <p>12 heard Mr Balmaceda's evidence. First of all, when you</p> <p>13 left the area of where the car you had travelled in had</p> <p>14 been and travelled south or walked round the south how</p> <p>15 close were you to the car that Mr Balmaceda had been in?</p> <p>16 <b>A. We were right beside that car.</b></p> <p>17 Q. And then from that car what route did you take</p> <p>18 continuing southwards towards the BdV?</p> <p>19 <b>A. We continued to travel south towards the BdV for</b></p> <p>20 <b>a distance of maybe about 200/250 metres and then we</b></p> <p>21 <b>turned east over across the blacktop surface to engage,</b></p> <p>22 <b>well, to try and bring the attention to the military</b></p> <p>23 <b>vehicles.</b></p> <p>24 Q. Did you see any person that represented the description</p> <p>25 Mr Balmaceda has given today of seeing somebody with a</p> <p style="text-align: center;">Page 89</p>	<p>1 <b>A. When the military had came -- approached us and had</b></p> <p>2 <b>interacted with us.</b></p> <p>3 Q. So he had caught up with you had he, by then?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Did you have any conversation with him?</p> <p>6 <b>A. Not at that point, no.</b></p> <p>7 Q. When did you next speak?</p> <p>8 <b>A. I actually never really got speaking to Joe because when</b></p> <p>9 <b>we were brought back to the VCP1 area him and</b></p> <p>10 <b>Iain Adamson were taken into the medic vehicles which</b></p> <p>11 <b>were available at VCP1 and given treatment straight away</b></p> <p>12 <b>and then taken straight to In Amenas hospital.</b></p> <p>13 Q. Thank you very much. I understand -- can I just ask</p> <p>14 you, you explained that you didn't look back and see the</p> <p>15 route that Mr Balmaceda took to you?</p> <p>16 <b>A. Not specifically, no.</b></p> <p>17 Q. Did you see the route Mr Andrada took?</p> <p>18 <b>A. Not specifically. I just have a recollection of him</b></p> <p>19 <b>coming to the same location where we had encountered</b></p> <p>20 <b>with the military.</b></p> <p>21 MR OWEN-THOMAS: I am grateful. Thank you very much indeed.</p> <p>22 Thank you, sir.</p> <p>23 <b>A. You're welcome.</b></p> <p>24 THE CORONER: Thank you very much for helping again.</p> <p>25 <b>A. You're welcome.</b></p> <p style="text-align: center;">Page 91</p>
<p>1 bald head lying on their back on the ground?</p> <p>2 <b>A. No, I've no recollection of seeing anybody in that</b></p> <p>3 <b>position in that location.</b></p> <p>4 Q. Was Mr Balmaceda with you when you were coming south or</p> <p>5 did he follow you later?</p> <p>6 <b>A. He followed after because originally we had thought he</b></p> <p>7 <b>was too injured to make his escape with us so we</b></p> <p>8 <b>continued to escape first and then Joe Joe followed</b></p> <p>9 <b>after us.</b></p> <p>10 Q. Did you see the route he took? Did you turn round?</p> <p>11 <b>A. Not specifically, no.</b></p> <p>12 Q. If there had been somebody lying on the ground as you</p> <p>13 travelled south, do you think you would have seen them</p> <p>14 or were you travelling so fast in a way that you</p> <p>15 wouldn't have noticed them?</p> <p>16 <b>A. I would be confident if there had of been someone laying</b></p> <p>17 <b>in that position that I would have encountered them in</b></p> <p>18 <b>my escape.</b></p> <p>19 MS DOLAN: Thank you very much.</p> <p>20 <b>A. You're welcome.</b></p> <p>21 Questions from MR OWEN-THOMAS</p> <p>22 MR OWEN-THOMAS: Thank you very much, sir. If I may just</p> <p>23 ask one question to follow up that.</p> <p>24 When did you next see Mr Balmaceda after you had</p> <p>25 started your run south?</p> <p style="text-align: center;">Page 90</p>	<p>1 <b>(The witness withdrew)</b></p> <p>2 MS DOLAN: Sir, now the next witness is Mr Johnston.</p> <p>3 MR WILLIAM JOHNSTON (sworn)</p> <p>4 Questions from MS DOLAN</p> <p>5 MS DOLAN: Afternoon Mr Johnston. I'm Bridget Dolan and</p> <p>6 I am counsel asking questions on behalf of the coroner.</p> <p>7 Can you give us your full name please?</p> <p>8 <b>A. My name is William Nicol Johnston.</b></p> <p>9 Q. And I think you are employed by BP?</p> <p>10 <b>A. I am indeed, yes.</b></p> <p>11 Q. And how long have you worked for BP?</p> <p>12 <b>A. For 34 years.</b></p> <p>13 Q. At the time of the events that we are concerned with</p> <p>14 what was your position at BP?</p> <p>15 <b>A. I was and am the business support manager for the JV.</b></p> <p>16 Q. And you still are in that role?</p> <p>17 <b>A. I am indeed.</b></p> <p>18 Q. Can you tell us what that means in practice being the</p> <p>19 business support manager?</p> <p>20 <b>A. So as the title suggests, it is the supply of business</b></p> <p>21 <b>support services to the entire JV and that consists of</b></p> <p>22 <b>the functions of finance, for which I have about 40</b></p> <p>23 <b>staff, who we call supply change management, procure to</b></p> <p>24 <b>pay. That's about another 40 staff. I also have</b></p> <p>25 <b>responsibility for ITC, information telecoms and</b></p> <p style="text-align: center;">Page 92</p>

23 (Pages 89 to 92)

1 **communication, that is about 20 staff. And I was also**  
 2 **operator representative of the AFMC contract and as we**  
 3 **know, there are about 30 staff. So about 130 staff.**  
 4 Q. In your role as managing the AFMC contract what did that  
 5 actually involve in terms of that aspect of your  
 6 position?  
 7 **A. If, for example, I was to draw a pie chart of my time on**  
 8 **the AFMC contract, about 75 per cent of my time was**  
 9 **spent on the AFMC terms and conditions and managing the**  
 10 **admin of the contract. For reasons it was quite**  
 11 **a difficult contract at the time, so much of my role was**  
 12 **to try and have a fully functional motivated AFMC**  
 13 **workforce.**  
 14 **The remaining 25 per cent I would say would be split**  
 15 **equally into discussing threats and threat management**  
 16 **and the remaining time would be risk reductions and site**  
 17 **issues over the two associations, In Salah and**  
 18 **In Amenas.**  
 19 Q. In discussing threats and threat management was it any  
 20 part of your role to assess threats or was it just to  
 21 manage threats identified by others?  
 22 **A. I consider my role with respect to threats as another**  
 23 **ear, another management ear, if you like. So what**  
 24 **I would do -- we -- if I can just describe how it**  
 25 **worked. We had a regular Sunday morning meeting.**  
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1 **8 o'clock every Sunday. And when I heard these threat**  
 2 **assessments my role was really to articulate them**  
 3 **towards management, particularly ISG, In Salah Gas**  
 4 **association because In Salah Gas management was**  
 5 **domiciled in Hassi. And also to get that on to what we**  
 6 **called the team leader's agenda and then from the team**  
 7 **leaders' agenda it could be escalated into the JOC which**  
 8 **I think you have heard about.**  
 9 **Now, I didn't have any direct communication with**  
 10 **liaison at the In Amenas site.**  
 11 Q. I think you are about to be asked to pull the microphone  
 12 closer to you.  
 13 **A. So for In Amenas I didn't have any direct communication**  
 14 **with liaison at site. My communication was with the**  
 15 **liaison managers at Hassi Messaoud.**  
 16 Q. And we know that is John Wigg and Gary Butt?  
 17 **A. Yes, that's correct.**  
 18 Q. Your role covered the JV at In Amenas and In Salah Gas  
 19 but it sounds from what you are describing there that  
 20 you had more input into the management at In Salah Gas  
 21 because of their geographical location, is that --  
 22 **A. Generally that's true, yes.**  
 23 Q. So if you wanted to bring up similar issues with the  
 24 management at In Amenas how would that be done?  
 25 **A. So it would be done -- so let me describe how we could**  
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1 **elevate any conversations to the next level, and this**  
 2 **applies for both In Salah and In Amenas. We would get**  
 3 **a slot on the team leader's agenda, which was a monthly**  
 4 **agenda, and these would be discussed at team leader**  
 5 **meetings and actions would come out of that. So that**  
 6 **was one.**  
 7 **Now, I should say that there was a regular slot on**  
 8 **the In Salah Gas team leader meeting for liaison. There**  
 9 **was not for In Amenas and the reason for that was**  
 10 **Sonatrach at In Amenas didn't like to have liaison**  
 11 **issues on the agenda. So that's two ways.**  
 12 **There's a third way that it could be elevated and**  
 13 **that could be simply direct communications at the**  
 14 **In Amenas site so, for example, between the JOC members.**  
 15 **It could be done that way. It could be straight on to**  
 16 **the JOC agenda, so someone would get very emotive about**  
 17 **a topic, they would come to the business support**  
 18 **manager, ask for it to be put on the In Amenas agenda**  
 19 **and it would be elevated that way. And the final way I**  
 20 **guess is just the annual budget conversation, there**  
 21 **could be conversations that would put it into the**  
 22 **budgetary process.**  
 23 Q. Because I think you act as a secretary to the JOC at  
 24 In Amenas?  
 25 **A. Yes, so, sorry, in addition to my functional roles I was**  
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1 **secretary to the JOC and I think you have heard the JOC**  
 2 **is the highest level of decision making in the JV. My**  
 3 **role was primarily one of governance, so to make sure**  
 4 **that the legal framework of the production sharing**  
 5 **contract was adhered to in the JOC, so that would be**  
 6 **accumulation of agenda items, minutes, quorate and**  
 7 **signatures et cetera.**  
 8 Q. You are not a decision maker in that meeting at all?  
 9 **A. I have no vote on the JOC. So I should add I also held**  
 10 **a similar role in the CdG and that is the remit of my**  
 11 **role.**  
 12 Q. But as secretary and as somebody in your business  
 13 manager role concerned in these things you can influence  
 14 whether something goes on the agenda on the meeting  
 15 although you can't make decisions about what then  
 16 happens, is that --  
 17 **A. Yes, I can have a view. I can certainly have**  
 18 **a discussion, yes.**  
 19 Q. And in your liaison with the liaison managers, with  
 20 Mr Wigg and Mr Butt, how would security issues get  
 21 raised and discussed there? What was the mechanism for  
 22 that?  
 23 **A. Well, there was a summary presented to me every Sunday**  
 24 **morning. The first section of the summary would be on**  
 25 **threats. The second would be a whole list of site**  
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1 **issues. It could be anything, it could be allocation of**  
 2 **radios, issues with vehicle allocation et cetera**  
 3 **et cetera, for all the sites, for In Salah and**  
 4 **In Amenas. And then the last section, which is the**  
 5 **75 per cent of the conversation, would be around the**  
 6 **AFMC contractual issues.**  
 7 Q. In respect of those meetings or issues raised by AFMC we  
 8 have been provided with what have been described to us  
 9 as minimum security standards for physical security at  
 10 camps. It may be best if I get that document in front  
 11 of you before I start talking about it. It should be in  
 12 core bundle 5 at 0.  
 13 I think you should be looking there at an email  
 14 dated 19 June, is that the top document?  
 15 **A. Yes, that's correct.**  
 16 Q. And if you look behind attached to that is a document  
 17 headed "Permanent Camp Physical Security Requirements"?  
 18 **A. I'm sorry, did you say it was an attachment?**  
 19 Q. It is the attachment to that email?  
 20 **A. Oh yes, yes.**  
 21 Q. First of all, is that a document you have seen before?  
 22 **A. I was certainly copied in on this, this email on**  
 23 **19 June, so, yes, I would have read it.**  
 24 Q. This has been described to us by Mr Butt as representing  
 25 the minimum requirements for security at camps. First

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1 of all, is that your understanding of what this  
 2 represents?  
 3 **A. Well, minimum security is not a term that I'm aware of.**  
 4 **It appears in the security management plan, I'm aware of**  
 5 **that, I think at the front when it describes the**  
 6 **physical security measures. But I can only really talk**  
 7 **to the physical security measures that came in front of**  
 8 **me in terms of trying to access the JOC. So this is not**  
 9 **really a document I would be familiar with, no.**  
 10 Q. It must be clear your role was not to devise this  
 11 document or write it or to decide what should be in it?  
 12 **A. No, I didn't have any part to play in it at all in**  
 13 **except that there was something that had to be elevated**  
 14 **to JOC but that wouldn't be entirely unreasonable. I've**  
 15 **got no particular competency to discuss security.**  
 16 Q. And I am not anticipating that that is -- that your core  
 17 role is to give any advice about this. What Mr Butt has  
 18 suggested is that there were some issues in respect of  
 19 minimum requirements that weren't being met and what  
 20 I want to understand with you is in your role as  
 21 business support manager to what extent do you have any  
 22 oversight of whether things that are recommended by  
 23 others, who are the security professionals, are actually  
 24 operationally carried through or if they're not carried  
 25 through drawn to the attention of, say, the JOC or the

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1 CdG if things aren't happening? First of all, would  
 2 that be within your role to the draw to attention  
 3 operationally that things aren't happening that others  
 4 might suggest should happen?  
 5 **A. Only inasmuch as it was requested to come to the JOC.**  
 6 **So for example, the external parking at the IBO, for**  
 7 **example, would be -- the only item I can think of that**  
 8 **would have been a direct conversation between myself as**  
 9 **business support manager and liaison on physical**  
 10 **security. So only where there was a request to go to**  
 11 **JOC.**  
 12 Q. So if it would require liaison to, in a sense, trigger  
 13 your involvement by asking you about it or asking you to  
 14 put it to JOC?  
 15 **A. Sorry, could you just repeat that?**  
 16 Q. Well, I will try to put it more simply. If we look at  
 17 this document it could appear that there are some things  
 18 which appear to be suggested to be minimum standards  
 19 which weren't in place?  
 20 **A. I can't comment on that.**  
 21 Q. What I am trying to understand is where in the  
 22 management structure a business support manager fits if  
 23 things that have been recommended aren't in place trying  
 24 to move those things on. I appreciate in that it may  
 25 not be your final, the buck stops with you and it is

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1 your total responsibility to do it, but trying to  
 2 understand the structure of getting things to happen if  
 3 security professionals are recommending something and it  
 4 doesn't appear to be happening. Do you have any  
 5 involvement in that or any responsibility?  
 6 **A. I have a responsibility if liaison come to me with**  
 7 **a specific JOC request. So, for example, the external**  
 8 **parking at the IBO. I do specifically remember that.**  
 9 **And then it's my duty to support my team and to get that**  
 10 **elevated for management discussion. I don't recall --**  
 11 **I don't recall any other discussion on physical security**  
 12 **that liaison wished to elevate and in fact, I don't**  
 13 **think we discussed physical security at all at the**  
 14 **weekly meeting.**  
 15 Q. So at the weekly meetings when you are discussing  
 16 threats and risks there's no discussion about management  
 17 of those threats and risks?  
 18 **A. There's no discussion about the physical security, no,**  
 19 **no.**  
 20 Q. Is there any expectation that what are being expressed  
 21 as minimum requirements for physical security are met at  
 22 camps?  
 23 **A. Sorry, could you repeat that again?**  
 24 Q. Is there any expectation, on behalf of the JV, and  
 25 I think you are a JV secondee?

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1 **A. Yes.**  
 2 Q. That things that are being described as minimum physical  
 3 security requirements are actually being met at camps?  
 4 **A. My understanding -- well, my understanding -- I don't**  
 5 **remember a big discussion or debate about that. All**  
 6 **I remember is that the security management plan through**  
 7 **time states that security measures were adequate at**  
 8 **In Amenas. That's all I remember.**  
 9 Q. I will come on to that in a moment because you are  
 10 right, there are documents which suggest, messages about  
 11 it being adequate. On the face of this document it  
 12 appears that some elements being suggested weren't in  
 13 place at In Amenas, in particular this suggests the main  
 14 entrance should have a motorized sliding gate of heavy  
 15 industrial quality, between the two holepunches if you  
 16 look at that. Do you see at point 4 it suggests that  
 17 speed rams should be incorporated into the chicane to  
 18 slow approaching vehicles?  
 19 **A. Sorry, you have lost me. Which page?**  
 20 THE CORONER: Do you have one that says "Permanent Camp  
 21 Physical Security Requirements", just turn on through  
 22 that and you will come to page 4 of what you have there  
 23 and do you see it says "Permanent Camp Physical Security  
 24 Requirements" you have that at the top?  
 25 **A. Yes, sorry, yes, the attachment, yes.**  
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1 THE CORONER: You are just being asked about numbers 3 and 4  
 2 I think but Ms Dolan just go back to number 3.  
 3 MS DOLAN: So number 3 between the two holepunches it says:  
 4 "In general camps have a general entrance with  
 5 a permanently closed secondary entrance. "  
 6 And then it says:  
 7 "The main entrance should have a motorized sliding  
 8 gate of heavy industrial quality designed for heavy  
 9 use."  
 10 And it appears that at the time we are concerned  
 11 about that that wasn't in place at In Amenas. It is  
 12 going to be a very long question, so sorry.  
 13 Chicanes and barriers is the next point under 4.  
 14 **A. Yes.**  
 15 Q. And again, there appears to be a recommendation that  
 16 speed ramps are incorporated into the chicane to slow  
 17 approaching vehicles. I think you visited In Amenas?  
 18 **A. I did.**  
 19 Q. And I think it is right there weren't speed ramps  
 20 present?  
 21 **A. I certainly don't recall speed ramps.**  
 22 Q. And then 6 is external parking area and again what it  
 23 suggests is a fenced in external parking area should be  
 24 constructed. Do you see it there, point 6?  
 25 **A. Yes, I do. I am just wondering where it refers to. It**  
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1 **is the IBO I presume.**  
 2 Q. Our understanding is this is a generic document about  
 3 what the physical security should be at four camps. Is  
 4 that your understanding?  
 5 **A. Yes.**  
 6 THE CORONER: Do you see the second paragraph at the top,  
 7 that might bear on it? Do you see below is a brief  
 8 summary of requirements?  
 9 **A. Sorry, yes, sir, I do.**  
 10 MS DOLAN: Perhaps I should take you to the top paragraphs  
 11 to be fair to orientate you. What it says is:  
 12 "Although all sites will differ slightly the basic  
 13 physical security site measures will be uniform on all  
 14 locations.  
 15 "The chosen combination of physical security  
 16 measures are designed to serve a common purpose to stop  
 17 unauthorised entry of personnel and vehicles at the main  
 18 entrance and any point along the side perimeter."  
 19 Below is a big brief summary of requirements for  
 20 permanent camps such as BdVs [in the plural] CPF and  
 21 permanent contractor camps.  
 22 Our understanding is that this was a generic  
 23 document or guide?  
 24 **A. Generic.**  
 25 Q. And I should perhaps say also there were many things on  
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1 this document which were in place at In Amenas in  
 2 respect of fencing and some aspects of chicanes and  
 3 anti-vehicle barriers.  
 4 Just turning over again to point 7 where it is said  
 5 that:  
 6 "Two alarms shall be provided which are operated  
 7 from the guardhouse through the emergency power system."  
 8 And again, we have heard that at the CPF at  
 9 In Amenas there was one alarm but not two different  
 10 alarms.  
 11 If minimum security requirements aren't being met  
 12 then from what you have said it doesn't appear that your  
 13 role as business support manager is to check on this,  
 14 these physical security requirements and see that they  
 15 are in place?  
 16 **A. No, because I wouldn't have a competency in what minimum**  
 17 **security is. But I would have a competency in listening**  
 18 **to liaison staff if these minimum security requirements**  
 19 **or perceived lack of them were an issue and could they**  
 20 **have my assistance to raise this to the JOC. That would**  
 21 **be my role.**  
 22 Q. And I think perhaps we can see some of that when we get  
 23 to 16 July in 2012. I think you will find the next  
 24 email along. You may not recognise it but it is an  
 25 email from you.  
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1 **A. Okay.**  
2 Q. Do you want to have a moment just to -- I don't know,  
3 have you seen this document recently?  
4 **A. Yes.**  
5 Q. This email from 16 July, if we follow the train,  
6 commenced with an email from John Wigg alerting a number  
7 of people including members of the JOC at In Amenas that  
8 there had been a specific warning about a vehicle borne  
9 IED provided, I think unusually, by the local military  
10 at Hassi R'Mel?  
11 **A. Yes, that's my understanding.**  
12 Q. And I think he comments within it that it is unusual for  
13 the military to give an official warning in this like in  
14 paper. There were documents sent by the military?  
15 **A. Yes, I remember it was extraordinary for a fax to come.**  
16 **I think usually such things would be done verbally.**  
17 Q. But at this particular time the military thought it was  
18 so significant that the usual channels of people talking  
19 to somebody or just seeing extra military presence,  
20 there was something extraordinary here. They sent a fax  
21 saying, in a nutshell, we want to inform you we've got  
22 information about there may be an attack planned at an  
23 installation of economic importance, it will probably be  
24 a suicide bomb in a vehicle and we're warning you to be  
25 vigilant.

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1 **A. Yes.**  
2 Q. I am paraphrasing but I think that is the gist of what  
3 they were saying?  
4 **A. Correct.**  
5 Q. And they are saying be warned, put good access control  
6 in place?  
7 **A. Correct.**  
8 Q. It is right, is it not, that what this email then did  
9 was led -- this is John Wigg then saying to members of  
10 the JOC at In Amenas and elsewhere that this is  
11 a warning about Hassi R'Mel but it would be prudent to  
12 take it as a general reminder of threat at all our sites  
13 and have a look at our physical security?  
14 **A. Yes, and that's what the liaison team did really well.**  
15 **That was their job to assess threats and to raise that.**  
16 **Not just particularly associated with Hassi R'Mel and**  
17 **In Salah but indeed to spread, as you can see, to**  
18 **In Amenas, so, yes, a good job.**  
19 Q. The outcome of that was that John Wigg suggested to the  
20 In Amenas JOC that this was an opportune time as he put  
21 it to reopen discussion about stopping vehicle access to  
22 the IBO and the CPF?  
23 **A. Yes, that's correct.**  
24 Q. And what we heard from Mr Butt was that this was an  
25 issue that had been already, by that time, around for

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1 some time and there had been suggestions made by the  
2 liaison team that there should be external parking and  
3 again, I am paraphrasing him but he said those  
4 suggestions had not been -- had been rejected or not  
5 taken up by those at In Amenas. Is that your  
6 understanding?  
7 **A. Yes, Gary Butt came to me and said something along these**  
8 **lines, yes.**  
9 Q. Then we see your response to seeing these emails was:  
10 I'm going to put it on the JOC agenda?  
11 **A. Yes, I think there's a little bit in between there that**  
12 **got me to that position. So I remember a discussion**  
13 **with Gary because I wanted to seek to understand what**  
14 **the reason was on top of the information that John had**  
15 **kindly provided. So Gary explained to me the situation.**  
16 **He explained why he wanted -- why it was so important to**  
17 **him. I had to take probably a few times to understand**  
18 **it because I couldn't -- I seem to recall I couldn't**  
19 **remember what the distinction was between In Amenas and**  
20 **Hassi Messaoud. Hassi Messaoud I'm much more familiar**  
21 **with because that's where I live and we have a very**  
22 **similar arrangement in Hassi Messaoud. We had external**  
23 **parking for the visitors. So I had to understand if it**  
24 **was changing for In Amenas so why wasn't it changing for**  
25 **Hassi.**

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1 **When I understood what he was talking about I agreed**  
2 **to try to put it on the agenda.**  
3 Q. And what did you understand him to be talking about?  
4 **A. I understand a couple of things from memory. The**  
5 **philosophy as I recollect the conversation was if you**  
6 **have external parking it prevents the gate being open**  
7 **and closed over time. It can be more closed than it is**  
8 **open. And I think it also just reduced the physical**  
9 **aspects of search.**  
10 Q. And the advantage of the gate being closed is what?  
11 **A. It acts as a deterrent.**  
12 Q. Then was it also your understanding that there was not  
13 external parking at In Amenas?  
14 **A. Oh no indeed there was external parking at In Amenas.**  
15 **That is what confused me. And as I say, that's why**  
16 **I couldn't understand what was different from**  
17 **Hassi Messaoud because there is external parking at**  
18 **In Amenas for the visitors car park.**  
19 Q. For the visitors?  
20 **A. Yes.**  
21 Q. But not for the employees?  
22 **A. The JV vehicles parked between the two perimeter fences,**  
23 **yes but my understanding, and I may be wrong, but my**  
24 **understanding was that the perceived danger comes from**  
25 **the old battered Honda who's coming up the duck track.**

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1 **Not for the JV vehicle. So the fact that we had**  
 2 **external parking for visitors is actually the key.**  
 3 Q. Was it not contemplated -- the risk that one was seeking  
 4 to avoid by having external parking, what did you  
 5 understand the risk to be, what risk were you trying to  
 6 ameliorate?  
 7 **A. Well, as Gary described to me it was twofold. So one**  
 8 **was trying to keep the door closed more regularly and**  
 9 **also to prevent the need for physical searches of each**  
 10 **vehicle as the convoy went through.**  
 11 Q. But the risk is of those who are trying to do harm to  
 12 the people or the plant getting access?  
 13 **A. Indeed, yes, yes, it's an access precaution.**  
 14 Q. Whether that access is by a vehicle borne IED or  
 15 individuals with guns the purpose of external parking is  
 16 to provide a further layer of protection so that the  
 17 double perimeter fences that's recommended everywhere  
 18 and therefore the double gates that would be there then  
 19 would remain closed. Is that how you understood it?  
 20 **A. I think that's much more comprehensive than I recollect**  
 21 **at the time but as I say, it was an access control**  
 22 **measure, yes.**  
 23 Q. Because it would stand to reason that if you have a gate  
 24 for security it's not secure if it's open?  
 25 **A. Well indeed, yes.**

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1 Q. You talked --  
 2 **A. Sorry, could I just add, it is not secure if it is open**  
 3 **all of the time but obviously it has to be open some of**  
 4 **the time.**  
 5 Q. But whenever it's open its effective risk management is  
 6 lost?  
 7 **A. I don't think I can -- I am getting into areas that**  
 8 **I don't really --**  
 9 Q. An open gate doesn't ameliorate the risk of somebody  
 10 getting through a gate?  
 11 **A. No, but I think a gate has to be open on occasions for**  
 12 **people to get in and out.**  
 13 Q. And the purpose of external parking is to reduce the  
 14 number of occasions on which a gate, which must at times  
 15 must necessarily be opened --  
 16 **A. That is correct, yes.**  
 17 Q. -- because even employees who park outside and walk  
 18 through a pedestrian entrance are reducing the number of  
 19 times the gate was open. Was that the logic of external  
 20 parking?  
 21 **A. Sorry, could you repeat?**  
 22 Q. Was the logic of external parking that even employees  
 23 would park outside and walk through a pedestrian gate  
 24 reducing the number of occasions on which any gate needs  
 25 to be open to vehicles?

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1 **A. Try one more time.**  
 2 Q. If one parks externally to the perimeter fences?  
 3 THE CORONER: You are just opening the gate less often.  
 4 I think that is really what it comes to.  
 5 **A. Yes.**  
 6 THE CORONER: If -- and so there is on one view less  
 7 opportunity for somebody to be able to force their way  
 8 through in a vehicle, whether they are heavily armed  
 9 individuals or whether they have some sort of explosive  
 10 device. That is the thinking, isn't it?  
 11 **A. Indeed, yes.**  
 12 MS DOLAN: And moreover, if you don't have external parking  
 13 and people have fixed routines for work, there are bound  
 14 to be times when the gate is open and known to be open  
 15 at times of peak flow.  
 16 **A. There were -- I think I recollect there were times**  
 17 **agreed with the JOC members when it would be open and**  
 18 **closed. I can't remember exactly the times but, yes.**  
 19 Q. I am not asking you to remember the fine detail of the  
 20 times. I am still on the principle. That must be the  
 21 principle?  
 22 **A. Yes.**  
 23 Q. But we can see from the email that you wrote on 16 July  
 24 that your intention was to take this to the JOC to put  
 25 on their agenda?

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1 **A. Yes. Gary was very passionate about the request and how**  
 2 **important this particular request was. So I gave the**  
 3 **JOC members a heads up that I would like to put it on**  
 4 **the JOC agenda. That really was to provoke**  
 5 **a conversation as to, do you agree that it does go on**  
 6 **the agenda, but I didn't get a response so it**  
 7 **automatically went on to the agenda.**  
 8 Q. So in terms of you can affect things you did what was  
 9 asked of you and escalated it up to the people who are  
 10 the decision makers?  
 11 **A. Yes, indeed. Although the first item on the agenda,**  
 12 **every agenda, is do you agree the agenda.**  
 13 Q. So the obvious question is going to come next, did you  
 14 agree the agenda?  
 15 **A. Yes, they did.**  
 16 Q. Did it stay on the agenda?  
 17 **A. Well, there was a couple of events after this particular**  
 18 **JOC from memory, so it did go on the to the agenda,**  
 19 **that's for sure. Shall I continue?**  
 20 Q. Yes, tell us what happened.  
 21 **A. The JOC was scheduled for the 21 July. I can't remember**  
 22 **the exact date but unfortunately a few days after the or**  
 23 **a few days before the JOC Mimoun Benghenima the general**  
 24 **manager at the time, his father passed away**  
 25 **unfortunately. And he couldn't make the meeting.**

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1 So what actually happened was what I tried to do,  
 2 there was a lot of important issues on the agenda.  
 3 There was a lot of people waiting for stuff and actions  
 4 so I asked the JOC members if it would be okay to take  
 5 the most urgent items and I defined what I thought the  
 6 criteria were for urgent on that particular occasion.  
 7 And suggested that we might try to do this JOC by email  
 8 and that at the next JOC we could ratify the decisions  
 9 that we took on email at the previous JOC.  
 10 So as I went through the agenda on 21 July my  
 11 criteria at the time was urgent people issues and to  
 12 make matters more complicated we had had our In Salah  
 13 JOC and there were items that needed In Amenas support  
 14 for it to become a decision so they were kind of half  
 15 done. So I took over the ISG items and put them on to  
 16 the In Amenas agenda so that we could complete that.  
 17 That was my criteria.  
 18 In that criteria the external parking did not make  
 19 that criteria simply because, and there is a lot of  
 20 other precedents on the agenda, it would have been  
 21 a much bigger discussion and that wasn't the kind of  
 22 discussion we were going to have in email, so --  
 23 Q. Understandably --  
 24 A. So the bottom line is when the JOC took place by email  
 25 it was not on the agenda. However, however, when Mimoun  
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1 answered and wrote his email comments for the agenda he  
 2 referred to the original agenda for which the external  
 3 parking was on the agenda. But he did not comment on  
 4 the external parking.  
 5 Q. I can understand if somebody's father dies, unfortunate,  
 6 unforeseen, meetings get cancelled and things changed.  
 7 Did it get put on the agenda for the next meeting?  
 8 A. It did not.  
 9 Q. Why not?  
 10 A. I don't know.  
 11 Q. So it got lost completely from the agenda, do we take  
 12 it?  
 13 A. It did not reappear, but I don't know if there was  
 14 a discussion at site for the next time. All I can say  
 15 is I didn't get the same request for the next time so  
 16 I would be in, you know, the following two months after  
 17 that on my particular -- and it didn't appear on the  
 18 agenda so I don't know.  
 19 Q. If you look at the next email in the chain, and it is  
 20 17 July, so actually it is the day after the email in  
 21 which you say you are going to put it on the agenda and  
 22 I think you put it on the agenda for a meeting you told  
 23 us on the 21st but actually by the 17th is this  
 24 a document you have seen and do you need a moment to  
 25 look at it before I --  
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1 A. I have seen this document.  
 2 Q. So here we have a document which appears to be an email  
 3 from the liaison OLS signed by Paul and that would be  
 4 Paul Morgan?  
 5 A. Correct, yes.  
 6 Q. It's not directed to you, it actually appears to be  
 7 directed to John Wigg, but you say you are familiar with  
 8 the document?  
 9 A. Yes.  
 10 Q. Giving an update on a meeting Paul Morgan has had with  
 11 Mark Cobb and Rabah Moktari?  
 12 A. So Rabah was the, no -- so Rabah was the operations  
 13 manager at -- he would have been the most senior  
 14 Sonatrach person I expect on site at that time.  
 15 I expect Mimoun might not have been there that  
 16 particular day but I don't know of course but Rabah was  
 17 certainly the most senior Sonatrach.  
 18 Q. And this was a meeting to discuss the vehicle borne IED  
 19 threat and includes the fax received from the military  
 20 the month before?  
 21 A. Yes.  
 22 Q. And Paul is saying in that that he has updated Rabah  
 23 Moktari because Mark Cobb was already familiar and  
 24 discussed how "We can enhance our security procedures  
 25 here at discuss our Tigantourine especially in regard to  
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1 access control, vehicles and personnel."  
 2 And stressed the point that:  
 3 "Creating an external parking area at the CPF/IBO  
 4 area to further minimise the risks but In Amenas  
 5 management have rejected this idea."  
 6 They explained the issues have been highlighted in  
 7 the past and in their opinion it is not necessary:  
 8 "Nonetheless I have pointed out the importance of  
 9 extra vigilance, vehicle searches and limiting vehicle  
 10 access to the BdV and companies camp area."  
 11 And:  
 12 "The need to permanently close vehicle access gates  
 13 at the entrance to the CPF and the IBO."  
 14 Is it fair to say that this is the Paul Morgan, the  
 15 security person on site at In Amenas, expressing a view  
 16 that external parking is important and permanently  
 17 closing gates at the CPF is important?  
 18 A. That appears to be the case, yes.  
 19 Q. And it is a view that is not accepted by management?  
 20 A. I mean, in rereading the email it is not clear to me  
 21 whether when he says that at the end he is referring to  
 22 the entire email or specifically to the point that he  
 23 stresses. But certainly I mean, I take this to mean  
 24 that In Amenas management rejected the idea of external  
 25 parking. That's what --  
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1 Q. To be fair to you read on through it.  
 2 THE CORONER: Have you read the whole -- just in case  
 3 because you may want to expand or qualify or to add to  
 4 an answer. Just read the whole thing.  
 5 **A. Sorry, can you repeat your question?**  
 6 MS DOLAN: To be fair to read on.  
 7 THE CORONER: Top of the next page. Do you have two little  
 8 lines there?  
 9 **A. Yes.**  
 10 THE CORONER: Yes.  
 11 MS DOLAN: To read on through this what was agreed by  
 12 management --  
 13 THE CORONER: Hold on, he is just going to read the last two  
 14 lines. (Pause)  
 15 **A. Okay. Good.**  
 16 MS DOLAN: What was agreed by management was a system where  
 17 the vehicle access gates as Paul Morgan put it would  
 18 nonetheless be kept open during peak periods to allow  
 19 traffic flow and then in the morning between 5.45 and  
 20 6.15 for half an hour over the lunch period and half an  
 21 hour at the end of the day there is an agreed period  
 22 where the gate is agreed to be left open.  
 23 **A. Yes, those were the times I couldn't remember.**  
 24 Q. And after these hours they would be closed permanently.  
 25 Paul Morgan escalated that up to John Wigg, to his

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1 immediate supervisor, who then sent this actually on to  
 2 Barry Shaw and Barry Shaw's role in this is?  
 3 **A. Barry. So Barry was what was called the business**  
 4 **security manager, not the business support manager, at**  
 5 **BP and there's a clause in the AFMC contract, part of**  
 6 **the responsibility for liaison is to interface with the**  
 7 **shareholder security managers, so the reason Barry was**  
 8 **involved in this is there's always an interface between**  
 9 **Barry and the liaison manager.**  
 10 Q. But you were also briefed on this I think, is the "Bill"  
 11 referred to in that email you?  
 12 **A. Yes, because this is the point that Garry came to talk**  
 13 **to me about to try to elevate to the JOC.**  
 14 Q. You say Garry, this appears to be from John Wigg, is it?  
 15 **A. That's how John would sign his name, yes, that's John,**  
 16 **yes. I was --**  
 17 Q. What did he say to you about this?  
 18 **A. John?**  
 19 Q. Yes.  
 20 **A. I don't remember a conversation with John on external**  
 21 **parking at the IBO. I remembered the conversation with**  
 22 **Garry.**  
 23 Q. What John says is:  
 24 "See below for information. MC..."  
 25 I am assuming that is Mark Cobb?

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1 **A. Yes.**  
 2 Q. "...does not recognise the requirement for external  
 3 parking. He also will only allow the vehicle access  
 4 gates to be closed during the quiet times. I have  
 5 briefed Bill on this..."  
 6 And you accept that is a reference to you?  
 7 **A. Correct.**  
 8 Q. "Who wanted an update and Bill is now going to raise  
 9 these points at the next JOC as a minuted item, to get  
 10 a record of Mark Cobb's response. Having raised this  
 11 several times here I cannot push it any further."  
 12 It might appear that what Mr Wigg is saying is he  
 13 thinks this is important, wants it to happen, feels he  
 14 has pushed it a lot and is looking to those more senior  
 15 than him to do it?  
 16 **A. Yes, indeed.**  
 17 Q. Given that coming from the AFMC people to advise on  
 18 security was allowing that to fall off the agenda  
 19 something that should have happened?  
 20 **A. Well, I can only go back to the time of these**  
 21 **conversations and I agreed it was important enough to**  
 22 **elevate. I don't know specifically how it did not**  
 23 **reappear on the agenda. If there had been a specific**  
 24 **conversation at site, for example, similar to the**  
 25 **17 July conversation, then I can understand why it**

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1 **didn't reappear but of course I don't know that. So**  
 2 **I don't know why it didn't reappear.**  
 3 Now, I should say that at any time the same  
 4 conversation could have happened with me at a subsequent  
 5 time and I don't remember any other conversation on this  
 6 from liaison with the business support manager.  
 7 Q. But what liaison are saying is having raised this  
 8 several times here I can't push it any further, this  
 9 wasn't the first time they raised it, was it?  
 10 **A. I don't know how often it was raised. In my tenure that**  
 11 **was one that was raised at that particular time with**  
 12 **some emotion but I can't recall it being raised before.**  
 13 Q. You say with some emotion?  
 14 **A. External parking at the IBO was something that both John**  
 15 **and Garry pushed quite hard.**  
 16 Q. Because they recognised the risk presented by not having  
 17 the ability to close gates at peak times?  
 18 **A. Yes, it's back to the original reasons which is access,**  
 19 **access control, yes.**  
 20 Q. I think one of your roles was involvement in the risk  
 21 action plans?  
 22 **A. Yes.**  
 23 Q. I think as part of the process of looking at security on  
 24 sites you raised a risk action plan to manage the risk  
 25 of terrorism?

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1 **A. Correct.**  
 2 Q. Or wanted to raise?  
 3 **A. Yes.**  
 4 Q. What happened about that plan?  
 5 **A. Can I go back with you and just describe the context?**  
 6 Q. Yes.  
 7 **A. So in 2012 generally, not because of terrorism but**  
 8 **generally the JV had very good risk management**  
 9 **conversations in a lot of aspects of the JV. Whether it**  
 10 **be health, safety, environment or reputational risks.**  
 11 **But what was missing was a cohesive risk civil**  
 12 **management plan which was throughout the JV and I mean**  
 13 **In Salah as well as In Amenas.**  
 14 **So what I tried to do was to standardise a process**  
 15 **for risk management and my first step was to unashamedly**  
 16 **borrow the process from BP and put that to the JOC**  
 17 **committee members and of course it was something that**  
 18 **was debated but they didn't like the BP format because**  
 19 **it was too corporate, too -- much too sophisticated. So**  
 20 **they asked me to simplify it. So I simplified it and**  
 21 **I went back to the JOC with a revised process which was**  
 22 **accepted and instead of having what we call an eight by**  
 23 **eight matrix we produced a five by five matrix and that**  
 24 **simply means it's a methodology of reporting risk**  
 25 **probability and impact.**

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1 **Anyway, that was accepted by the JOC and the next**  
 2 **thing was to prepare a risk matrix, a risk matrix was**  
 3 **prepared which included a terrorist act. When I first**  
 4 **presented that risk matrix the risk in terrorism didn't**  
 5 **go down very well with Sonatrach. It was something they**  
 6 **wanted removed. But nevertheless I asked for a little**  
 7 **bit more definition on all the risks, not just the**  
 8 **terrorist risk, this was everything, health, safety,**  
 9 **environment, the lot, and we produced what was called**  
 10 **the risk action plan and the plan was simply to give**  
 11 **more definition of the risk, what was it, how would you**  
 12 **describe it, who was responsible for it, what are you**  
 13 **doing about it, and what assurance and help do you need**  
 14 **to mitigate it?**  
 15 **And that was the means by which the RAP, as we call**  
 16 **it, the risk action plan was prepared for terrorism. It**  
 17 **was something that I requested John Wigg to do, well the**  
 18 **liaison manager to do, I'm not sure if it was John or**  
 19 **Garry and they prepared the document, the Risk Action**  
 20 **Plan document for risk -- for a terrorist act.**  
 21 Q. You said that when you suggested there needs to be  
 22 a plan for the risk of terrorism Sonatrach didn't accept  
 23 that. Tell us more about that?  
 24 **A. Yes, you know, there was a lot of witnesses in the room**  
 25 **so, you know, it's not just -- it's not just my opinion.**

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1 **It seemed that Mimoun was a little embarrassed that this**  
 2 **had to appear as a major risk and his comment at the**  
 3 **time was: "This is not a major risk. It's something**  
 4 **that's handled adequately by the security forces. Could**  
 5 **you please take it off the matrix?" I don't know if**  
 6 **those were his exact words but it was to that effect.**  
 7 Q. So one interpretation of that might be that one of the  
 8 JV partners is closing their mind to the risk of  
 9 security forces not being able to stop people getting  
 10 close to the plant because of course as we understood  
 11 from many witnesses the JV itself can't tell the  
 12 military or the Gendarmes what to do?  
 13 **A. Correct.**  
 14 Q. And they'll do what they do based on their own  
 15 assessments of need. All you can influence is what you  
 16 can do once you get to the fence and the gate. Is it  
 17 fair to say that one of the JV partners didn't want a  
 18 risk assessment of terrorism because they closed their  
 19 minds to terrorists getting that far?  
 20 **A. No, not at all. In fact, on the contrary. I haven't**  
 21 **asked the JOC members this, but I remember the meeting**  
 22 **well. My initial reaction to it was one of**  
 23 **corroboration, that the security forces were well in**  
 24 **command of our protection at site, so it wasn't**  
 25 **something that made me aghast when he said it. I think**

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1 **what he was saying to us was, you know, recognise the**  
 2 **risk is out there but it's well covered. And that kind**  
 3 **of gave me a sense of assurance actually because the**  
 4 **ultimate objective of a risk matrix is actually to make**  
 5 **the risk disappear. That's ultimately where you want to**  
 6 **get to. It is never quite as simple as that but that's**  
 7 **the endgame. So this is one that came off for that**  
 8 **reason, so my reaction at the time was, well, okay,**  
 9 **we're well covered.**  
 10 Q. But that, therefore, must mean that everyone is  
 11 accepting the assumption that the only thing we need to  
 12 manage this risk is the Gendarmes and the military doing  
 13 their bit correctly and they are going to do it so we  
 14 don't have to worry about us doing anything because  
 15 they're going to do their bit and that makes the risk  
 16 disappear?  
 17 **A. Well, of course I can't speak for the JOC members, but**  
 18 **the layered security was something that was embedded in**  
 19 **law. Every expat that comes into the country is told in**  
 20 **no uncertain terms that the military and the Gendarmes**  
 21 **through their zonal protection system will protect us,**  
 22 **so I wouldn't find it strange to think that all the**  
 23 **expats round the table that day felt some sense of**  
 24 **relief. But I can't speak for the others.**  
 25 Q. Because under the security management plan itself which

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1 the JV had and adopted, and I think if you need to  
 2 remind yourself of the one in place at the time you will  
 3 find it in that green bundle on your right at tab 11.  
 4 Again, is that a document you are familiar with when you  
 5 get to it?  
 6 **A. December 2012, yes.**  
 7 Q. Is that the security management plan? Would you see  
 8 those security management plans --  
 9 **A. Yes.**  
 10 Q. -- as the business support manager? If you turn to  
 11 internal page 4 or it is actually page 93 in the bottom  
 12 right-hand corner. The paragraph below the second  
 13 holepunch that begins "The JV", go to the second  
 14 holepunch?  
 15 **A. The second holepunch.**  
 16 Q. Below that is a paragraph that starts "The JV is not  
 17 able ..."?  
 18 **A. Yes.**  
 19 Q. I will just give you a moment to read that through  
 20 rather than me reading it at you. (Pause)  
 21 **A. Okay.**  
 22 Q. To paraphrase again that paragraph what it is saying is  
 23 the JV isn't able to prevent terrorist attack because  
 24 that is the responsibility of the Algerian security  
 25 forces, as you have explained, but the project's

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1 approach to security is that all security  
 2 recommendations and procedures should minimise exposure  
 3 and limit the probability of such attacks occurring, and  
 4 of course to some extent you are still reliant on the  
 5 Algerian military and Gendarmes to limit the probability  
 6 of them occurring, but then and protect personnel and  
 7 installations in the event that the attacks should  
 8 occur.  
 9 So if an attack does occur, and everything the  
 10 Gendarmes and the military might have done to prevent  
 11 somebody getting close to the plant, surely it remains  
 12 the position that the JV have a responsibility for  
 13 ensuring that physical security is up to scratch and at  
 14 least up to the minimum standard?  
 15 **A. So I don't know what the minimum standard is. I can't**  
 16 **define what minimum standard is. "But if the JV is not**  
 17 **able to prevent any such terrorist or criminal attack",**  
 18 **I'm sorry, I have missed the point. What is the --**  
 19 Q. What this paragraph appears to be suggesting is whilst  
 20 the JV can't prevent an attack perhaps being aimed at  
 21 the JV because it's the job of the Algerians and the  
 22 Gendarmes to protect the zone and stop people from  
 23 getting to the doors, that the JV does have  
 24 a responsibility to protect personnel and installations  
 25 in the event that and an attack should occur. Surely

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1 that responsibility of the JV can only be those things  
 2 that it can influence itself?  
 3 **A. From inside the fence, yes.**  
 4 Q. From one foot outside the fence perhaps inwards?  
 5 **A. Well, okay, from ...**  
 6 Q. Therefore, I wonder if you can give us any help with how  
 7 it is that then recommendations that appear to be being  
 8 made and as you said, made with some emotion by liaison  
 9 team, are being rejected by managers within the JV and  
 10 although put on a meeting agenda by yourself when it  
 11 fell off the agenda for perhaps understandable reasons  
 12 not still furthered?  
 13 **A. I can't comment on that because I'm not a JOC member so**  
 14 **you would have to ask the JOC members. My role was to**  
 15 **promote information up the way. There may be some**  
 16 **reasons for this external parking at the IBO. I don't**  
 17 **know. I don't know what was the subject for the**  
 18 **conversation on 17 July.**  
 19 Q. Can I turn to the involvement that you actually had on  
 20 16 July because I think when the events happened you  
 21 were involved in the IMT at Hassi?  
 22 **A. 16 January?**  
 23 Q. Yes, January, of course. You were involved in the IMT  
 24 at Hassi?  
 25 **A. Yes, I wasn't a chosen member of the team that week**

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1 **because I was travelling to In Amenas but yes, I quickly**  
 2 **volunteered myself, yes.**  
 3 Q. What did your role become then within the IMT?  
 4 **A. Because I wasn't part of the IMT team I had a number of**  
 5 **different roles and they evolved through time so my**  
 6 **first role was to try to contact the embassies, so this**  
 7 **was very early in the morning, this was round about**  
 8 **6 o'clock in the morning. That was the -- the embassies**  
 9 **and the international agency contractors. So we had the**  
 10 **Locstat coming through, between 6 o'clock and 8 o'clock**  
 11 **we're trying to figure out who was done there and I had**  
 12 **the responsibility of contacting the international**  
 13 **contractor agencies to connect with them about their**  
 14 **personnel. That was my first task.**  
 15 **My second task was, well, task, it involved -- this**  
 16 **was the call that I got from one of the terrorists and**  
 17 **then the third task I had was the one on which I spent**  
 18 **the most time and that was the interface, if you like,**  
 19 **between the IMT1 and IMT2. IMT1 always was handling the**  
 20 **crisis. IMT2 was much more of a logistics team in**  
 21 **conducting the evacuation.**  
 22 **And the role I tried to perform there was to make**  
 23 **sure that the manifests for the people coming from the**  
 24 **site to the central areas was -- it was all proper and**  
 25 **then also the linkage between the sites and eventually**

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1 where they ended up abroad, either Germany or Parma or  
 2 London, to make sure that the manifests were in order  
 3 for their arrival.

4 Q. Can I ask you about the second of those things, the  
 5 telephone call that you received. I think that was  
 6 about 2 o'clock in the afternoon on the first day?

7 A. Yes, I seem to remember it was logged at 2.10, yes.

8 Q. And tell us about that call, please?

9 A. So I had a BlackBerry at the time and Tore Bech's name  
 10 came up on the face of the phone but it wasn't Tore Bech  
 11 who was on the phone. It was a terrorist using  
 12 Tore Bech's hand phone. So he described who he was.  
 13 The background noise was extremely noisy, it was the  
 14 intermittent sound of the security alarm and a lot of  
 15 shouting in the background. The terrorist was extremely  
 16 agitated, shouting, swearing. Very, very difficult for  
 17 me to -- it wasn't difficult to comprehend what he was  
 18 saying because he was speaking in English. It was  
 19 difficult over the noise and the lack of cohesiveness of  
 20 the sentences.

21 But anyway, the bottom line was he wanted the senior  
 22 management in the JV to understand that there were  
 23 helicopter gunships firing on the establishment.  
 24 I don't know whether at that time it was the CPF or  
 25 where Tore was. And it was necessary to stop that and

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1 if we didn't Tore and the other hostages would be  
 2 eliminated.

3 Q. Was that all the conversation?

4 A. So he asked me what I was doing about it. Now, I've put  
 5 in my witness statement I was negotiating. That's the  
 6 wrong terminology. I don't know how to negotiate with  
 7 a terrorist. I talked, I tried to keep the phone open.  
 8 I asked him what he wanted and he repeated he wanted it  
 9 stopped and what I could do about it. So the only thing  
 10 I could think of at the time was I can seek advice  
 11 because I had no jurisdiction with the Algerian  
 12 military, but: "In good faith I can try to do as much as  
 13 I possibly can and I can recommunicate with you." And  
 14 we agreed the best way to do that would be he would call  
 15 me back and we agreed 15 minutes.

16 So I -- by this time I had signalled through to the  
 17 guys in the far end of the room that there was  
 18 a dialogue going on with the terrorist and I remember  
 19 John Wigg beside me and Jeff Yates. I put the phone on  
 20 to loudspeaker eventually so they got the gist of the  
 21 conversation. And then we broke off and Jeff and John  
 22 went through to the IMT room. I was in a separate room  
 23 because I needed some peace and quiet. And the message  
 24 was communicated to the BST in London.

25 I was not part of that BST conversation but Jeff and

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1 John come back to me with a telephone number and also  
 2 a name and I took the name to be some sort of code  
 3 for -- this wasn't explained to me so it's only what  
 4 I thought of at the time, I took it as a code to try to  
 5 coordinate the phone calls so the next time the guy  
 6 calls you back pass over the number, also relay this  
 7 name that the BST had given me to try to convey that  
 8 perhaps there should be one conversation rather than  
 9 multiple conversations. That's -- that's how  
 10 I understood it.

11 Anyway, he did phone back and I communicated the  
 12 information to him. I think my words were you know, my  
 13 big boss is talking to your big boss. I don't know why  
 14 I said that. But that's what I said.

15 Q. But the name you were asked to pass on, was that a name  
 16 of the terrorist who was talking to the BST?

17 A. That was my understanding, yes.

18 Q. And I think you thought the name was -- can you remember  
 19 what you thought the name was?

20 A. I seem to remember the name of Sadat and that is what  
 21 I put in my witness statement. I hope it is right.

22 Q. We have heard since that the person talking to the BST  
 23 was calling himself Shedad, would that be?

24 A. Ah, okay, I didn't know that.

25 Q. But you were passing to this terrorist the phone number

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1 and name of another terrorist who was talking to the  
 2 BST?

3 A. No, no, I understood the phone number to be a line in  
 4 the BST. That's what I understood it to be.

5 Q. And in terms of the request to influence the military  
 6 you told us you passed it on to your BST. Were any  
 7 other steps taken in respect of it?

8 A. Not to my knowledge, no, I don't know.

9 Q. How much contact with the military is there at Hassi?

10 A. At Hassi?

11 Q. From the Hassi centre, how much liaison do you in your  
 12 role as business support manager ever have with the  
 13 military?

14 A. Zero.

15 Q. Do you have ability to talk to anybody in the military  
 16 if you wanted to?

17 A. Zero.

18 Q. And the same question about the Gendarmes?

19 A. Zero.

20 Q. Were you aware of anybody in the IMT of having direct  
 21 contact with the military or the Gendarmes?

22 A. I cannot under oath say if anybody was having direct  
 23 contact. No. The only thing I can say is that there is  
 24 a specific role in the IMT formed every single week and  
 25 it's a Sonatrach person and that Sonatrach person has

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<p>1 <b>the responsibility to speak to Sonatrach management in</b>  2 <b>Algiers. Now, I expect what would happen after that is</b>  3 <b>that Sonatrach would speak to the Algerian forces.</b>  4 <b>I doubt if it would be direct from HR in the IMT to the</b>  5 <b>Algerian forces but I may be wrong but I just don't.</b>  6 Q. But from what you are describing if one wants a line to  7 the Algerian forces it is Sonatrach who are an Algerian  8 company and government owned who can do that?  9 <b>A. Yes, that's my understanding and that is actually the</b>  10 <b>role of that particular member, yes.</b>  11 MS DOLAN: Thank you, Mr Johnston, I have no more questions  12 for you. Others will have.  13 THE CORONER: Mr Ritchie, can you just -- do you have  14 roughly any idea of how long you are going to be. We  15 are not sitting tomorrow. If we did go into Monday can  16 you be back here then or is that not.  17 <b>A. I'd prefer to roll on.</b>  18 THE CORONER: I just want to see if I can get some idea of  19 how long that is going to be because if it is going to  20 be --  21 MR RITCHIE: I expect to be about half an hour, sir.  22 THE CORONER: Right.  23 MR OWEN-THOMAS: Perhaps quarter of an hour.  24 MR GARNHAM: Again, quarter of an hour.  25 MS GERRY: About ten minutes, depending on the answers.</p> <p style="text-align: center;">Page 133</p>	<p>1 Q. So what I left out was ISG as well. You work for both?  2 <b>A. Yes, yes.</b>  3 Q. And you are still in that role now?  4 <b>A. Correct.</b>  5 Q. And the primary role is to manage finances, procurement,  6 supply chain but there are many other bits to it?  7 <b>A. Many other bits to what?</b>  8 Q. To your role. Shall I break that down?  9 <b>A. Yes.</b>  10 Q. You manage finances, is that right?  11 <b>A. Correct.</b>  12 Q. Do you manage procurement?  13 <b>A. I manage procurement, all aspects, it is supply chain.</b>  14 <b>It is from procurement through contracts.</b>  15 Q. Thank you. I think I used the words "procurement" and  16 "supply chain", and there are other matters that you  17 also have to manage?  18 <b>A. ITC, yes.</b>  19 Q. Now, can I come to the risk management system and matrix  20 that you introduced in 2012, you mention it specifically  21 in your witness statement. You, as I understand it,  22 generated or had generated the Risk Action Plan?  23 <b>A. I had generated the Risk Action Plan.</b>  24 Q. A slightly poor question, wasn't it. You had it  25 generated?</p> <p style="text-align: center;">Page 135</p>
<p>1 MS GOLLOP: Famous last words but about half that, five  2 minutes.  3 THE CORONER: And Mr Popat? It is obviously going to depend  4 to some extent.  5 MR POPAT: Sir, I would have expected in light of what's  6 just been said that I would be the same in the total by  7 myself, but.  8 THE CORONER: I am afraid we won't -- what we will do is go  9 on until about half past now. I am afraid -- if  10 I thought we would finish you then I would. I am sure  11 you would prefer I understand that but could you go on?  12 <b>A. Yes.</b>  13 THE CORONER: We will go on a little bit now but then we are  14 going to break off at about 4.30.  15 Yes, Mr Ritchie.  16 Questions from MR RITCHIE  17 MR RITCHIE: I represent the family of Carlos Estrada.  18 Now, you are a chartered management accountant by  19 trading, that is right, isn't it?  20 <b>A. That's correct, yes.</b>  21 Q. And you have worked at In Amenas since December 2010 for  22 the JV but employed by BP in effect?  23 <b>A. No, that's not correct. I worked at Hassi Messaoud on</b>  24 <b>behalf of the -- both associations. I visited In Amenas</b>  25 <b>but I started in 2010, yes.</b></p> <p style="text-align: center;">Page 134</p>	<p>1 <b>A. Yes, I had a lot of Risk Action Plans generated</b>  2 <b>emanating from a lot of risks. I asked liaison to</b>  3 <b>prepare a Risk Action Plan for terrorism.</b>  4 Q. Thank you. Can you take the core bundle 1, green bundle  5 and turn to tab 7, page 35, please. So when  6 understanding a Risk Action Plan there are various steps  7 that you have laid out or you have had others lay out  8 for you. The first is to identify the risk, isn't it?  9 <b>A. Correct.</b>  10 Q. The second is to categorise it by two scales on the  11 matrix, impact and likelihood?  12 <b>A. Probability, yes.</b>  13 Q. You call it probability?  14 <b>A. Yes.</b>  15 Q. And those you have described to Her Majesty's Coroner in  16 the JV's case were given five points per scale?  17 <b>A. That was the JV -- yes.</b>  18 Q. So whereas BP have eight points per scale in the JV it  19 is five points per scale?  20 <b>A. That's correct.</b>  21 Q. The lowest being one I presume and the highest being  22 five?  23 <b>A. One is remote, five is highly likely.</b>  24 Q. So the highest on the categorisation would be 5 times 5,  25 25?</p> <p style="text-align: center;">Page 136</p>

1 **A. Correct.**  
 2 Q. And the lowest 1 times 1 being 1?  
 3 **A. Correct.**  
 4 Q. And then having done that the JV through whichever means  
 5 has to create risk reduction measures, doesn't it?  
 6 **A. Yes, to mitigate the risk, yes.**  
 7 Q. And in fact, those usually come from liaison, as  
 8 I understand it?  
 9 **A. What -- for that particular risk, yes, yes.**  
 10 Q. To mitigate a risk you go to your experts and you get  
 11 suggested mitigating measures and then the JV considers  
 12 them and puts them in place. So then there is  
 13 implementation which is the next stage and finally there  
 14 is review of the status of implementation, and we can  
 15 see action, delivery dates and the like at the bottom of  
 16 that list on page 35. As I understand it you come in to  
 17 that at the implementation of measures because you have  
 18 to procure on the supply chain, don't you?  
 19 **A. Not me personally but my department, yes.**  
 20 Q. Your department. For the risk of terrorist attack we  
 21 have a Risk Action Plan at page 45 so could you just  
 22 turn to that please. It is just a few pages further on.  
 23 This was the JV's Risk Action Plan generated I believe  
 24 by the liaison team for the year 2012. Do you have that  
 25 page?

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1 **A. I do.**  
 2 Q. It is rather small writing. My apologies but the top  
 3 right, year 2012?  
 4 **A. Yes.**  
 5 Q. And the risk title is "Terrorist action/Kidnap" and the  
 6 description is there:  
 7 "Attacks by domestic or terrorist groups or other  
 8 organised groups or individuals against JV facilities  
 9 and/or people. AQIM alignment with AQ global. Threat  
 10 seen as primarily against western interests".  
 11 So a well described risk that happens to fall four  
 12 square within what happened in this inquest. Then the  
 13 risk consequences, terrorist attack, eg IED, multiple  
 14 fatalities, casualties, certainly potential for three or  
 15 more fatalities and multiple injuries.  
 16 That is a description. We then turn into matrix A  
 17 and matrix B. So shall we look at the matrices. Top  
 18 right, risk impact D. Do you see that?  
 19 **A. Yes, I do, yes.**  
 20 Q. That is not right, is it? It should be B for three or  
 21 more fatalities. Shall I show you the page where that  
 22 is exhibited? It is I believe page 39. So if you turn  
 23 forwards to page 39, you will see the risk matrix for  
 24 impact levels. Do you have page 39?  
 25 **A. Yes.**

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1 Q. Do you see B there?  
 2 **A. Yes, I do.**  
 3 Q. Do you see it says "between 3 - 10 fatalities"?  
 4 **A. Yes, I do.**  
 5 Q. So it won't be D which says "permanent partial  
 6 disability". D must be wrong, mustn't it?  
 7 **A. It is wrong.**  
 8 Q. So this is a B?  
 9 **A. No, it's actually not that at all because we agreed that  
 10 terrorism -- so let me -- the risk matrix is split  
 11 broadly into two, so you'll see also in the procedures  
 12 that you were referring to a moment ago we split the  
 13 risks into two sections. One is HSE risks and the other  
 14 is what we call business risks or risks to business and  
 15 the only way you can identify a risk to business is in  
 16 monetary terms.**  
 17 Q. Can you focus on terrorism though?  
 18 **A. Terrorism was classified as a business risk. That is  
 19 what I am trying to convey to you and therefore it falls  
 20 under category D of the second risk framework, the  
 21 business impact levels, not the HSE impact levels.**  
 22 Q. Do you mean you just -- you describe the risk in terms  
 23 of how much money would be lost?  
 24 **A. Well --**  
 25 Q. Because the second risk framework that you have just

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1 described, business impact levels, D, disruption to  
 2 local operations £1 million to £10 million. Is that  
 3 really the right matrix for terrorism?  
 4 **A. Well the context for this terrorism risk was really  
 5 grounded in the risk consequence, so it was deemed to be  
 6 a VBIED attack.**  
 7 Q. Let us look at the page, 45, back there:  
 8 "Risk consequences -  
 9 "1 Terrorist attack eg IED - multiple  
 10 fatalities/casualties. Certainly potential for 3 or  
 11 more casualties and multiple injuries if an attack  
 12 occurred on one of our offices or central processing  
 13 facilities. An incident would likely consist of  
 14 a vehicle bomb or shooting attack of some kind."  
 15 It is well described, the consequences. I don't  
 16 know why that's of any confusion to you. And those  
 17 consequences on the impact levels between 3 to 10  
 18 fatalities would be a B, wouldn't they?  
 19 **A. It is not confusing to me because I know it was deemed  
 20 as a business risk. That's how we categorised it, as  
 21 a business risk. It might be right or it might be wrong  
 22 but that was the way it was categorised. So it would  
 23 not fall into category D on the HSE impact level.**  
 24 Q. Your evidence is your evidence. There it is.  
 25 Let us then have a look at how that is displayed on

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<p>1 the primary risk and residual risk table. We have that 2 a little further on at page 185. So I wonder if you 3 could turn to 185 which you will find behind divider 15. 4 This is a slightly more colourful chart. So here is the 5 JV liaison project 2012 risk assessment matrix and do 6 you see risk number 1 is terrorism? 7 <b>A. Yes, I do, yes.</b> 8 Q. And do you see that the impact is 5 and the probability 9 is 3.5. Do you see those two? 10 <b>A. Yes.</b> 11 Q. Which produce a primary risk multiplying the two 12 together of 18. Do you see that? 13 <b>A. Yes.</b> 14 Q. If we look then at the first table beneath that table at 15 the top "Primary risk matrix with a numerical value of 16 between 16 and 20." Risk number 1, terrorism, is 17 therefore in the high category as a primary risk, isn't 18 it? Do you see the 1 there? 19 <b>A. Yes.</b> 20 Q. So before mitigating actions your expert liaison 21 advisers were putting terrorism in the high category for 22 impact and mixed with probability. That is where it 23 lay. That is what this means, isn't it? 24 <b>A. No, it's not my understanding at all. I have to</b> 25 <b>explain. The risk management system and process we put</b> Page 141</p>	<p>1 and the Risk Action Plan is at the back of that at 2 page 45. 3 <b>A. Okay, right. And then I also wish to refer to page 40</b> 4 <b>which was the description of the --</b> 5 Q. Probability. 6 <b>A. The probability, okay.</b> 7 Q. Yes. 8 <b>A. So what liaison gave me was a risk impact D and a risk</b> 9 <b>probability of 5. 5 according to the JOC definition is</b> 10 <b>a common occurrence at least annually at the facility.</b> 11 Q. Yes. 12 <b>A. Well --</b> 13 Q. They are giving you a high probability. 14 <b>A. Yes.</b> 15 Q. And lest there be any confusion, if you go back to 16 page 184 in relation to what liaison were producing in 17 relation to risk, 184, that's behind leaf 15, they have 18 set it out equally as clearly. So do you have 184? 19 <b>A. I do, yes.</b> 20 Q. JV liaison, project risk assessment 2012 terrorism, 21 described there, I am not going to go through it, impact 22 5, probability 3.5 and actions in place. And they set 23 out there, one of them is practice good security 24 protocol, which is about nine down and a couple beneath 25 that, effective physical security measures and access Page 143</p>
<p>1 <b>together, if you look at the documents that we put</b> 2 <b>together, it was a very simple risk matrix that we put.</b> 3 <b>We didn't have mathematical explanations for risk and</b> 4 <b>probability. This is something that I only found out</b> 5 <b>afterwards that the liaison produced. That was never my</b> 6 <b>request to liaison. My request to liaison was to take</b> 7 <b>the five by five and simply plot it. There was no maths</b> 8 <b>associated with it because the JOC didn't want anything</b> 9 <b>as complicated as this. This looks to me very much</b> 10 <b>like, you know, a shareholder type corporate system. It</b> 11 <b>was made clear to me that's not what was wanted. So all</b> 12 <b>I asked was a simple risk probability number and an</b> 13 <b>impact number and what I got was D5 and according to the</b> 14 <b>procedures that we agreed, in the JOC, 5 was absolute</b> 15 <b>nonsense because 5 means it happens regularly every</b> 16 <b>year.</b> 17 Q. So the JOC considered that the liaison's assessment of 18 probability was nonsense. That is what you just said. 19 The JOC considered liaison's assessment of probability 20 was nonsense? 21 <b>A. No, this is my interpretation just now. If you go back</b> 22 <b>to the -- sorry, I've lost the original --</b> 23 Q. What do you wish to go back to? 24 <b>A. I want to go back to the Risk Action Plan.</b> 25 Q. Fine. I think that was at 7. Risk management procedure Page 142</p>	<p>1 control to counter new threats, and then there are 2 various other things there. I am not going to go 3 through the lot but the actions are within the control 4 of liaison and what does BUSM mean? 5 <b>A. I think BUSM is a reference to the Business Unit</b> 6 <b>Security Manager. I think it is a reference to Barry</b> 7 <b>Shaw.</b> 8 Q. Now, if those risks are properly managed you get 9 a residual risk and I won't take you back to the chart 10 because you say you weren't comfortable with that 11 colourful chart but the chart brings the primary risk of 12 18 down to a residual risk of 14 and putting aside the 13 figures it's right, isn't it, that your risk matrix that 14 you introduced, the numbers come down if effective 15 mitigating actions are put in place? 16 <b>A. Correct, yes.</b> 17 Q. Let us look at those then. Can I turn first to concrete 18 sills on fences. Mr Fitzpatrick told Her Majesty's 19 Coroner, this was Day 6, page 82, sir, that liaison had 20 asked for perimeter fences to be upgraded because they 21 were not attached to the ground so, in his words "It was 22 very easy to get underneath". Were you aware that that 23 had been requested back in 2007 and had not been 24 installed for four and a half years? 25 <b>A. I have become aware of JOC minutes from that period of</b> Page 144</p>

36 (Pages 141 to 144)

<p>1 <b>time.</b></p> <p>2 Q. Why was nothing done in your procurement department</p> <p>3 between the date when you started in 2010</p> <p>4 and January 2013 to procure the coming about of that</p> <p>5 decision?</p> <p>6 <b>A. I don't know. I can't answer that question.</b></p> <p>7 Q. Thank you. Perimeter fences. These were -- perimeter</p> <p>8 vehicle barriers forgive me. Perimeter vehicle</p> <p>9 barriers. These were recommended in 2007, as set out in</p> <p>10 the security management plan. I can take you to the</p> <p>11 document but Her Majesty's Coroner has seen page 120 a</p> <p>12 number of times and I should cut to the chase. They</p> <p>13 were required and approved by the JOC in 2007 and yet</p> <p>14 in January 2013 they had not been installed on the north</p> <p>15 side, the west side or the east side of the CPF. So</p> <p>16 that Murielle Ravey and Gary Rose who slept there in</p> <p>17 that IBO area were liable to be, in effect ram raided</p> <p>18 straight in with no vehicle barriers protecting them.</p> <p>19 Were you aware that that decision had been made before</p> <p>20 your time?</p> <p>21 <b>A. I have subsequently become aware of it.</b></p> <p>22 Q. Why did your procurement department not bring about the</p> <p>23 procurement and installation of these vehicle perimeter</p> <p>24 barriers before the attack?</p> <p>25 <b>A. I can't comment. I don't know.</b></p> <p style="text-align: center;">Page 145</p>	<p>1 early 2007 a set of recommendations was made for the JV</p> <p>2 to have chicanes, T bars, external parking and security</p> <p>3 alarms. You have seen one of the documents produced to</p> <p>4 you today about minimum security requirements. And the</p> <p>5 recommendation was that all BdVs and CPFs should have</p> <p>6 external parking. Were you unaware of that? Were you</p> <p>7 unaware of that before those emails that you were shown</p> <p>8 by Ms Dolan?</p> <p>9 <b>A. I was only aware of a conversation on the IBO, not the</b></p> <p>10 <b>BdV.</b></p> <p>11 Q. So you were unaware of the generality of that</p> <p>12 recommendation made before your time?</p> <p>13 <b>A. Not the generality, no. Just -- certainly the IBO.</b></p> <p>14 Q. So the only thing that is in your recollection is the</p> <p>15 request for external parking at the CPF/IBO area?</p> <p>16 <b>A. Not the CPF, the IBO.</b></p> <p>17 Q. Sorry, it is the same entrance. You turn left to go</p> <p>18 into the CPF. You turn right to go into the IBO.</p> <p>19 <b>A. Yes, except you need a special permit to get into the</b></p> <p>20 <b>CPF.</b></p> <p>21 Q. Okay, I understand. But if you have got chicanes and</p> <p>22 two double crash proof barriers to get into the IBO that</p> <p>23 is going to protect you getting into the CPF because you</p> <p>24 have got to get through those to turn left into the CPF.</p> <p>25 Do you see the point?</p> <p style="text-align: center;">Page 147</p>
<p>1 Q. Manning guard towers. There are guard towers around the</p> <p>2 BdV, you are aware of that, you visited. There are none</p> <p>3 round the CPF, are there?</p> <p>4 <b>A. Honestly? I've --</b></p> <p>5 Q. It is not a memory test.</p> <p>6 <b>A. I don't have a memory of the CPF.</b></p> <p>7 Q. Fair enough. From 2008 Mr Fitzpatrick informed Her</p> <p>8 Majesty's Coroner, the reference is Day 6, page 93, that</p> <p>9 they were no longer manned because there was</p> <p>10 a changeover between the army and the Gendarmes. Before</p> <p>11 your time of course. Mr Fitzpatrick also said that he</p> <p>12 was against these being unmanned. He informed his line</p> <p>13 manager and he maintained that position all the way</p> <p>14 through up to 2012. Were you aware that Mr Fitzpatrick</p> <p>15 or anyone in liaison wanted the guard towers manned?</p> <p>16 <b>A. In my tenure, no.</b></p> <p>17 Q. So that never, to your recollection, came through JOC?</p> <p>18 It was never an issue raised as a general item and came</p> <p>19 through JOC?</p> <p>20 <b>A. Not to my knowledge, certainly not, no.</b></p> <p>21 Q. Thank you. External parking, my learned friend has been</p> <p>22 through all the external parking stuff, I don't want to</p> <p>23 labour this other than to the make the point shortly.</p> <p>24 Gary Butt informed Her Majesty's Coroner, that is</p> <p>25 Day 16, page 28 of the transcript that in late 2006 or</p> <p style="text-align: center;">Page 146</p>	<p>1 <b>A. I see.</b></p> <p>2 Q. Were you aware that the JOC at In Salah, way back in</p> <p>3 2006/2007 accepted external parking and installed it?</p> <p>4 <b>A. So that -- I have not seen JOC minutes on In Salah.</b></p> <p>5 Q. Have you been to In Salah?</p> <p>6 <b>A. I have been on a few occasions, yes.</b></p> <p>7 Q. Good. So you know it is external parking?</p> <p>8 <b>A. It is external parking for all cars, yes.</b></p> <p>9 Q. For all?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. The point being that if you have loads of staff driving</p> <p>12 in and out the doors are open and you have seen the</p> <p>13 emails when there were specific times when the doors</p> <p>14 were open and at the time, the relevant times the doors</p> <p>15 opened at 5.45 and the attack occurred at 5.47, within</p> <p>16 the window. The agreed window when the gates were</p> <p>17 supposed to be open.</p> <p>18 Can I turn then to motorized impact resistant gates.</p> <p>19 There is an email from April 2007 relating to those</p> <p>20 which was disclosed, I believe, last night with a bundle</p> <p>21 of documents relating to MOC201. I will go very quickly</p> <p>22 to that if I may, sir. Pagination is going to be</p> <p>23 tricky --</p> <p>24 <b>THE CORONER:</b> Will you make the point in the next three</p> <p>25 minutes?</p> <p style="text-align: center;">Page 148</p>

1 MR RITCHIE: Yes.  
 2 THE CORONER: Or if you would rather start it on Monday.  
 3 MR RITCHIE: It probably would be easier to start it because  
 4 there will be some rustling of paper so it might get  
 5 more clumsy within three minutes.  
 6 THE CORONER: Okay, rustle that paper on Monday.  
 7 MR RITCHIE: I am very grateful.  
 8 THE CORONER: Mr Johnston, we are going to break off there.  
 9 We are not sitting tomorrow and we are going to start  
 10 again at 10.15 on Monday morning and we'll conclude your  
 11 evidence then. That is all so far as you are concerned,  
 12 thank you very much for coming today.  
 13 (The witness withdrew)  
 14 I just have one or two other things and, Ms Dolan,  
 15 if there is anything I have missed out please say.  
 16 Mr Bristow won't be coming on Monday. That will be  
 17 at a later date, not yet decided. I have also concluded  
 18 that the request to call Mr Dudley is something that  
 19 I will take a final view about after we have heard from  
 20 Mr Bristow, whenever that is. It seems to me that it  
 21 may very likely be that Mr Bristow can cover in broad  
 22 terms what if any information was coming back from  
 23 anyone in Algeria as to how matters would be handled.  
 24 But I am not asking for anything from Mr Dudley at this  
 25 stage. As I say, I will take the final decision about

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1 that after we have heard from Mr Bristow, whenever that  
 2 is.  
 3 It is not my present intention to call Professor  
 4 Keenan and I will either say something more about that  
 5 or circulate a note about that next week and if anybody  
 6 then wants to say anything about that then of course  
 7 they can.  
 8 And then finally I think I decided earlier this week  
 9 that I would put the inquest transcripts on the inquest  
 10 website. Just to say this, there have been occasions in  
 11 the proceedings when individuals in Algeria have not  
 12 been identified by full name and that will be maintained  
 13 in the transcripts when they go on the website.  
 14 Anything else I need to mention now? No. All  
 15 right.  
 16 MS GOLLOP: May I briefly mention one thing. It matters  
 17 less given what you said about Mr Bristow not attending  
 18 on Monday but I am slightly anxious to see the statement  
 19 from the ambassador and I have communicated helpfully  
 20 with my learned friend Mr Barr about this but a brief  
 21 update would be appreciated.  
 22 THE CORONER: Yes. Let's see if we can have a brief one.  
 23 Do you mean now?  
 24 MS GOLLOP: No time like the present.  
 25 MR BARR: Sir, yes. As far as I am aware I haven't

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1 personally seen it and I will be corrected from behind  
 2 if I am wrong but as far as I am aware that while we  
 3 have been sitting today a statement has been submitted  
 4 to the court.  
 5 THE CORONER: There we are. All right. So it should be at  
 6 any moment. We'll pursue that for you. But there we  
 7 are. Good, so 10.15 Monday. 8  
 (4.30 pm)  
 9 (The inquest adjourned until Monday, 20 October at 10.15 am)  
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