

# **WITNESS STATEMENT**

**(Criminal Justice Act 1967, s.9;**

**Magistrates Court Act 1982, s.5B;**

**Criminal Procedure Rules, r 27.2)**

**STATEMENT OF: Claude Schmidt**

**Address: 2 rue Marie Curie, 68500 Merxheim, France**

**Age of witness: Over 18**

**Occupation: General manager of Arconic Architectural Products SAS  
(hereinafter referred to as AAP SAS)**

**This statement (consisting of 3 pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable for prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.**

**Date 10/09/2019**

**Signature: [signature]**

1. I am the above-named person and I have been asked to provide information to the Metropolitan Police in the context of the investigation into the fire at Grenfell Tower. This is my third witness statement.
2. The facts presented below are my own knowledge, unless indicated otherwise or where the context demands another interpretation. When I mention information provided by a third party, I identify the source of that information.
3. I am making this statement in my native language, i.e. French. I am aware that it will be translated into English and that a sworn translation will be provided to the Metropolitan Police.
4. In this statement I mention several documents appended to this statement in the numbered set identified as annex CS/12 consisting of 33 pages.
5. On 12 July 2017 my computer was subjected to a suspect search, by KL Discovery, instructed by DLA Piper, the legal representatives of AAP SAS (hereinafter referred to as **Image 2017**).
6. Around the beginning of June 2018, my portable computer was replaced and my data were transferred to my new computer. All the data on my former portable computer were then deleted.

[signature]

[signature]

7. I took advantage of this migration of data to clean what I considered former and redundant data in order to free up space on my portable computer. I thus deleted a number of folders and files dating from before 1 January 2016 which I considered would not be of use to the investigation into Grenfell Tower. When I deleted the data I was aware that the data prior to 1 January 2016 had already been copied by KL Discovery's technical department.
8. DLA Piper reminded me of my obligations and informed me that I should not have deleted *any* data. I sincerely regret having done so.
9. In order to rectify this situation, AAP SAS asked KL Discovery, via DLA Piper, to take the following steps:
  - 9.1 on 13 August 2019, KL searched my new portable computer (hereinafter referred to as **Image 2019**);
  - 9.2 KL Discovery compared Image 2017 with Image 2019 and identified the documents from Image 2017 that were not on Image 2019; and
  - 9.3 KL Discovery copied the missing documents (i.e. those from Image 2017 that were not present on Image 2019) onto an encrypted USB stick which they delivered to me at AAP SAS.
10. I now have access to all my data, including the data that were deleted during the migration of the data explained above.
11. KL Discovery has prepared a report describing in detail all the actions they carried out on my data. A copy of this report is submitted at CS/12.

Signature [signature]

Date 10/09 2019

[signature]

[signature]