

OPUS 2

INTERNATIONAL

London Bridge Inquests

Day 26

June 14, 2019

Opus 2 International - Official Court Reporters

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1 Friday, 14 June 2019
 2 (10.00 am)
 3 MR HOUGH: Good morning, sir. The first witness today is
 4 Commander Evans.
 5 COMMANDER DAVID EVANS (affirmed)
 6 THE CHIEF CORONER: Good morning, Commander Evans. If you
 7 wish to take a seat, please do so.
 8 A. Thank you.
 9 THE CHIEF CORONER: And a simple request of speaking nice
 10 and loudly and clearly into the microphone. Thank you.
 11 Questions by MR HOUGH QC
 12 MR HOUGH: Would you please give your name and rank for the
 13 court?
 14 A. I'm Temporary Commander David Evans of the City of
 15 London Police.
 16 Q. Commander Evans, you appreciate I ask you questions
 17 first on behalf of the Coroner, and you may then receive
 18 questions from other lawyers?
 19 A. Thank you very much. Before I commence my evidence,
 20 I would just like to make a comment?
 21 Q. Yes, please.
 22 A. On behalf of the City of London Police and all those
 23 officers involved in the event on the evening, I would
 24 like to offer my condolences to the family and our
 25 thoughts are with you. Thank you.

1

1 THE CHIEF CORONER: Thank you very much.
 2 MR HOUGH: Thank you, Commander.
 3 You understand you're here to give evidence about
 4 the operational response of the City of London Police as
 5 a whole to the attack on 3 June 2017 as well as your
 6 part in that?
 7 A. Yes, I understand.
 8 Q. You made a witness statement on that subject on
 9 26 February of this year and you may refer to that as
 10 you wish.
 11 A. Thank you.
 12 Q. May I begin with your policing career. When did that
 13 career start?
 14 A. I joined the City of London Police in 1996, so I'm in my
 15 23rd year of service.
 16 Q. In June 2017 what was your rank?
 17 A. I was the chief superintendent within the Intelligence
 18 and Information Directorate.
 19 Q. Since then can we gather from what you have said
 20 already, have you been promoted to temporary commander?
 21 A. On a temporary basis within the last month.
 22 Q. On 3 June 2017, and specifically the evening of that
 23 day, what was your duty role?
 24 A. The city of London Police has a superintendent rank, so
 25 either a superintendent or a chief superintendent,

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1 performing a night duty role as a senior officer on duty
 2 in the City. On this evening it was myself.
 3 Q. Where were you based that evening?
 4 A. My office, my business as usual office, is at Wood
 5 Street Police Station on the first floor and I was
 6 working from there on that evening.
 7 Q. What was your shift?
 8 A. Commencing at 19.00 through to 07.00 the next day.
 9 Q. Were you the most senior City of London Police officer
 10 on duty that day?
 11 A. Yes, I was.
 12 Q. In a sentence or two, what was the role of the senior
 13 duty officer or duty superintendent?
 14 A. Well, the role of the superintendent rank or the senior
 15 officer on duty is to take control of any significant
 16 incidents that take place within the City during that
 17 time. We may also be called upon to give specific
 18 authorities under legislation during that period, but
 19 it's mainly for incident command.
 20 Q. At the Wood Street station was there also a command hub
 21 from which City of London Police officers could be
 22 directed?
 23 A. Yes, the force control room is situated on the fifth
 24 floor of the same building, Wood Street Police Station.
 25 Q. So just up some stairs or a lift from your office?

3

1 A. Indeed, yes.
 2 Q. A little background about the City of London Police,
 3 please. As the title suggests, is it the force
 4 responsible for policing the City, the Square Mile, as
 5 it's called?
 6 A. Indeed, yes. A lot of people may not realise that the
 7 City of London is actually a geographically distinct and
 8 independent police force from the wider London policing
 9 footprint, so in real terms it's the Thames in the south
 10 to the Old Street sort of road in the north, from
 11 Chancery Lane in the west through to Tower Bridge in the
 12 east.
 13 Q. So it's a defined geographical area with its own
 14 boundary on a map?
 15 A. Indeed, yes.
 16 Q. Does it include the entirety of London Bridge itself,
 17 the roadway?
 18 A. Yes, it includes the span of London Bridge and then at
 19 the south end of London Bridge is where we hand over to
 20 the Metropolitan Police.
 21 Q. Does your area, therefore, include the area immediately
 22 to the north of London Bridge?
 23 A. Yes.
 24 Q. As you've indicated, though, it does not include the
 25 area immediately to the south, including Borough Market,

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1 which is in the wider Metropolitan Police area?
 2 A. That is correct.
 3 Q. Is it right, though, that City of London Police officers
 4 may go outside their area or the geographical area
 5 covered by the City, and will in many situations assist
 6 or work alongside Metropolitan Police colleagues?
 7 A. Absolutely, we have an excellent working relationship
 8 with the Metropolitan Police and it is quite common
 9 throughout many of our policing activities for us to
 10 interchange with the Metropolitan Police across our
 11 borderline.
 12 Q. Operation Plato, we've heard from Superintendent
 13 McKibbin of the Metropolitan Police about Operation
 14 Plato and the procedures for responding to a marauding
 15 terrorist attack. I imagine you are very familiar with
 16 those procedures too?
 17 A. I am.
 18 Q. When an Operation Plato declaration is made in London,
 19 as we heard from Mr McKibbin, there are set actions
 20 which include the City of London Police and
 21 British Transport Police being informed?
 22 A. Yes, that is correct.
 23 Q. In practical terms, what happens to the command of your
 24 forces after a Plato declaration?
 25 A. In the event of Operation Plato being declared in

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1 response to an MTA, marauding terrorist attack incident,
 2 immediately the firearms assets of the City of London
 3 Police form part of the wider pan-London firearms
 4 command in line with the armed asset mobilisation plan.
 5 Because Plato, by its very definition, is a major
 6 incident requiring the deployment of all of the blue
 7 light services, we fall under the Metropolitan Police
 8 command structure at that point.
 9 Q. So in simple terms, in an incident like this, it makes
 10 sense for all the firearms assets to be under a single
 11 command?
 12 A. I think it's essential, in delivering an effective
 13 response and that is what happened and whilst I may be
 14 the senior officer on duty in the City and retain
 15 a function in that respect, I too myself fall under the
 16 Metropolitan Police command structure.
 17 Q. We heard earlier this week from V134, who was the
 18 Tactical Firearms Commander in the ARV pod for the
 19 Metropolitan Police, and she told us about directing
 20 ARVs as the incident developed. Would your City of
 21 London Police ARVs fall under, effectively, her
 22 direction and the direction of the Metropolitan Police
 23 Tactical Firearms Commander at the scene?
 24 A. Following a Plato declaration, yes.
 25 Q. Yes. A few questions about the command hub, please.

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1 In that hub at any one time, how many staff would be
 2 present?
 3 A. We would have a police inspector as the duty officer in
 4 the force control room, a supervisor and then five other
 5 members of staff.
 6 Q. In a sentence or two what would their role, and
 7 particularly the role of the operators be, in the
 8 ordinary course before any major incident developed?
 9 A. They would receive inbound traffic into the control
 10 room, assess, and where necessary seek to dispatch
 11 units, City of London Police units, to deal with that
 12 incident. We may also have people monitoring sort of
 13 the phone switchboard, and the CCTV facility which is
 14 within the control room.
 15 Q. So that CCTV facility is, I think, described or called
 16 Synectics?
 17 A. That is the proprietary name for the system that exists,
 18 yes.
 19 Q. Does that system give access to a number of static
 20 cameras across the City of London area?
 21 A. It gives access to a number of cameras. When you say
 22 static, they're in a fixed location but each camera head
 23 may be movable and, yes, they are viewable from the
 24 force control room.
 25 Q. Are they all movable or only some of them?

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1 A. Most are movable but there are some with fixed
 2 positions.
 3 Q. Would your operators have the ability to access any one
 4 of those cameras?
 5 A. Yes.
 6 Q. Would they have the ability to pan and zoom using those
 7 cameras?
 8 A. Yes, they would.
 9 Q. I'm not going to ask you about what monitoring happens
 10 as a matter of course over those cameras, but if there
 11 is cause to look at a camera in any particular location,
 12 would the ordinary action of the operator be to access
 13 it and to use it to move around and look in the
 14 appropriate place?
 15 A. Yes, there are obviously far more cameras than any one
 16 person operator could monitor but the screen layouts
 17 within the control room offer the potential to monitor
 18 more than one camera at any one time.
 19 Q. Thank you.
 20 Now, are there, in particular, a camera on the north
 21 side of London Bridge?
 22 A. Yes, there is.
 23 Q. And also a camera on the south side of London Bridge?
 24 A. Again, correct.
 25 Q. We have seen CCTV stills from, I think, both of them.

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1 Some questions about CADs and communications. We've
 2 heard about the CAD system of the Metropolitan Police
 3 Service. Does the City of London share access to that
 4 system?
 5 A. Yes, we do.
 6 Q. As well as seeing information on any particular CAD, can
 7 the operators in your control hub enter information onto
 8 CADs?
 9 A. Yes, they can raise a CAD as a result of direct action
 10 being taken by police officers or the calls into the
 11 control room, but in respect of 999 calls, those CADs
 12 are created by the Metropolitan Police and passed to us.
 13 Q. So if a member of the public calls 999, or indeed
 14 a Metropolitan Police officer makes a radio call which
 15 causes a CAD to be generated, that's
 16 a Metropolitan Police CAD?
 17 A. In the first instance, yes, before it could be passed to
 18 the City of London.
 19 Q. And it may be passed to you, for example, if the
 20 incident requires a response from your officers?
 21 A. Yes.
 22 Q. In that situation could a CAD either be deliberately or
 23 automatically routed to your control hub?
 24 A. Both.
 25 Q. We heard from Mr McKibbin that in some cases a CAD will

1 be automatically routed to the appropriate area, which
 2 might include yours?
 3 A. Indeed, yes.
 4 Q. In addition, are members of the public sometimes making
 5 calls to police using the 101 number which come through
 6 to you?
 7 A. Yes, we, like every police force around the country,
 8 receive 101 calls. We also have a publicly published
 9 switchboard number for the City of London Police also.
 10 Q. In the evening, which of course is the period we're
 11 concerned with, after 6.00 pm, who handles those 101
 12 calls?
 13 A. At that time they would come directly to the force
 14 control room in Wood Street Police Station.
 15 Q. As you've told us, those operators in that command hub
 16 could create CADs based on those 101 calls?
 17 A. Yes.
 18 Q. After a CAD has been created by a City of London Police
 19 officer or passed to your control hub, is it right to
 20 say that further entries can then be made by your
 21 operators on that CAD?
 22 A. Yes, that is correct.
 23 Q. The operators can and will also communicate to officers
 24 on the ground by radio to dispatch them to incidents?
 25 A. Yes, we, again, like many police forces, use the Airwave

1 radio system.
 2 Q. A couple of questions about that radio system. We've
 3 heard that it's a system which can have many channels or
 4 talk groups operative at any one time?
 5 A. Yes, that's correct.
 6 Q. What does the control hub do to monitor those channels
 7 or talk groups?
 8 A. There are many more channels than could be possibly
 9 monitored within the force room and our main working
 10 channel within both control room and for the staff, the
 11 City of London Police staff on the ground is referred to
 12 as City Ops 1, that is the main channel that is
 13 monitored. The ability to monitor additional channels
 14 is available through the system in the force control
 15 room and would have to be selected by changing channels
 16 by an operative on the ground.
 17 Q. Do the Airwave radios used by your officers and the
 18 Airwave radio system used in the control hub also give
 19 access to the channels used primarily by other forces?
 20 A. Yes, there are obviously national hailing groups for
 21 police forces around the country. There are
 22 a significant number of channels within the London
 23 folders, accounting for the size of the policing
 24 function within London and they can be accessed by
 25 officers, yes.

1 Q. In major incidents is it right, as we've heard from some
 2 others, that radio channels can become very busy, making
 3 it difficult for officers actually to get through and
 4 send a message?
 5 A. Yes. Once a message is being passed, if another officer
 6 was to try and press the "Push to talk" button on their
 7 radio they would receive a tone which means they can't
 8 get in on that channel at the time. But the volume of
 9 traffic in normal policing activity bears no relation to
 10 that which was encountered on this evening.
 11 Q. May we now move to the attack itself, and the start of
 12 that attack. We know it began at 10.06 on the night of
 13 3 June. Were you in your office at that time?
 14 A. I was.
 15 Q. How soon after the attack began were you informed,
 16 roughly?
 17 A. I was listening to my radio, which I had on in my
 18 office, and I was aware of a message being passed with
 19 regards to a traffic incident on London Bridge, and at
 20 that point, I decided to make my way to the control
 21 room.
 22 Q. Can we bring up on screen, please, {DC7288/1}. We can
 23 see here the Airwave radio transcript for the City of
 24 London Police, which refers to initial reports that
 25 a number of people had been knocked over by a van and

1 some of them apparently injured.
 2 A. Yes.
 3 Q. Were those the messages you were listening to?
 4 A. Yes.
 5 Q. How quickly after those initial messages, which we know
 6 were in the first couple of minutes after the attack
 7 started, how quickly after hearing those did you go
 8 downstairs?
 9 A. Upstairs to the control room.
 10 Q. Sorry, upstairs.
 11 A. Minutes after.
 12 Q. When you got there, what were the officers in the
 13 control hub doing?
 14 A. The control room was exceptionally busy not with extra
 15 numbers of people, but with the volume of traffic that
 16 was being passed over the radio, and it was certainly
 17 a very busy place.
 18 Q. Were any efforts made in those early minutes to
 19 visualise the scene?
 20 A. The use of CCTV is common in sort of most policing
 21 activities within the City due to the propensity of the
 22 cameras and, yes, the closed circuit television system
 23 was used.
 24 Q. We can bring up on screen, please, {AV0091/29}. We see
 25 here a still from City of London Police camera, I think

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1 one mounted at the south end of London Bridge; is that
 2 right?
 3 A. Yes, that's correct.
 4 Q. And that shows the van embedded in the railings at
 5 22.07, so immediately after the collision?
 6 A. Yes.
 7 Q. And then the next page, please, page 30 {AV0091/30}.
 8 Now, at the same time we see that camera has been zoomed
 9 in on the registration plate of the van?
 10 A. Yes, that is correct.
 11 Q. Does that suggest that your officers controlling the
 12 CCTV camera were directing the camera at the van and
 13 zooming in at that stage.
 14 A. Yes, I must add around with regards to the control of
 15 the CCTV, the technology that exists within the CCTV
 16 allows the cameras to be both monitored and moved by
 17 some of our London partners, but I would imagine at this
 18 time this was completed by one of the staff in the
 19 control room.
 20 Q. If so, that would suggest that they were doing this
 21 fairly quickly after the attack began?
 22 A. Yes.
 23 Q. May we return to the radio transcript, {DC7288/1}. Is
 24 it right to say that in those early minutes some ARV
 25 units of City of London officers self-deployed to the

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1 scene of the attack?
 2 A. Yes, that is correct.
 3 Q. We've heard that those included Trojan City 1, which had
 4 officers BX44, BX45 and BX46 crewing it, and Trojan
 5 City 2 included Mr Duggan, PC Duggan, those ARVs both
 6 deploying to the scene?
 7 A. Yes, they did.
 8 Q. If we look to the bottom of this page of transcript do
 9 we see reference to Trojan City 2 transmitting that that
 10 unit was going to assist on the bridge?
 11 A. Yes.
 12 Q. Did the control then give details of the van and its
 13 registration number?
 14 A. Yes.
 15 Q. Is it likely that they got those details from using the
 16 camera in the way that we've seen?
 17 A. It's stating an obvious point, there is no line of sight
 18 between the control room and there, so yes, that
 19 information could only have been gleaned by the camera
 20 system.
 21 Q. Of course, it could have come in from an officer at the
 22 scene but from what we know about when officers arrived,
 23 it's likely that it was from the camera?
 24 A. Yes.
 25 Q. Then page 2, please {DC7288/2}. If we look a little

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1 under half of the way down, can we see that there is
 2 a transmission coming in from Trojan City 1, the ARV
 3 whose officers confronted the suspects, the attackers,
 4 a communication from that ARV saying that it was
 5 attending near the crashed vehicle?
 6 A. Yes.
 7 Q. And then further down the page can we see that your
 8 operators were also calling the London Ambulance Service
 9 in this early period?
 10 A. Yes, that is correct.
 11 Q. We can then see further down communications about
 12 a heavy object or person in the river.
 13 A. Yes, I believe that is as a result of a radio message
 14 from one of our officers who had reported that into the
 15 force control room.
 16 Q. Yes, we've heard a little about that already, but is
 17 this a fair picture of what was happening in the control
 18 room in those early minutes, dealing with these
 19 disparate calls describing what was going on and sending
 20 out communications including to the ambulance service?
 21 A. Yes, indeed. The input of information into the control
 22 room would not always cause an action or reaction to be
 23 taken, but calling the LAS, based upon the assessment of
 24 those officers and, indeed, what could be seen, is
 25 an obvious response for force control room.

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1 Q. And over to {DC7288/3}, please, where we can see at the
 2 top of the page some communications with the Marine
 3 Policing Unit vessels coming up on London Bridge, which
 4 we know is a time of arrival timed at 22.14?
 5 A. Yes, that's correct.
 6 Q. So we're now about 7 or 8 minutes into the attack.
 7 While all this was going on, were other
 8 communications also taking place over other Airwave
 9 channels?
 10 A. Yes. The firearms units in particular monitor multiple
 11 channels, including the firearms channel, and there is
 12 also a BTP firearms channel being monitored by the
 13 firearms unit.
 14 Q. In your witness statement at paragraph 27, you say that
 15 it seemed clear that part of the incident was being run
 16 on the Southwark talk group?
 17 A. Yes. The point at which the incident had taken place
 18 was effectively on a fulcrum of the
 19 British Transport Police area, the Metropolitan Police
 20 area and the City of London Police area, and it was
 21 evident that there were units attending that had not
 22 been subject to our CAD requests so, again,
 23 an assumption that they must have been directed via
 24 other means.
 25 Q. Based on what you've told us, you were in the command

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1 hub within a few minutes after the start of the attack;
 2 is that right?
 3 A. Yes.
 4 Q. When did it become apparent to you in the sequence of
 5 events that we've been looking at that this was
 6 a terrorist incident?
 7 A. I think it's difficult to answer that one with accuracy
 8 now without knowing the extra information that I now
 9 know that I did not know then, but I think it's the
 10 indications of the deliberate act of mounting the
 11 pavement that really confirmed, and I think it was the
 12 ongoing nature of the incident after a crashed vehicle
 13 and subsequent actions taking place that suggested to me
 14 that this was a different type of incident.
 15 Q. {DC7288/4} now, please, of the same document, the radio
 16 transmissions. Can we see on this page of the
 17 transmission that there are communications coming
 18 through from BX45, one of the crew in the armed response
 19 vehicle which reached the attackers first?
 20 A. Yes.
 21 Q. And we can see that BX45 gives a running commentary as
 22 this set of communications continues?
 23 A. Yes.
 24 Q. And if we look at the middle of the page, control refers
 25 to the last location for the ARV given as

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1 Borough Market.
 2 A. Yes.
 3 Q. And that's a reference to a communication simply with
 4 the words "police officer" giving the location
 5 Borough Market about four lines down from the top?
 6 A. Yes.
 7 Q. So at the time that that ARV was coming towards
 8 Borough Market, we know at about 10.16, they were in
 9 communication with the control room?
 10 A. Yes.
 11 Q. And then can we see in the middle of the page that
 12 a communication is received:
 13 "... three males have been shot and were taken ..."
 14 And then there's inaudible words:
 15 "... something strapped to their chest. Over."
 16 A. Yes, I can see that.
 17 Q. Then a few lines down, a police officer:
 18 "... got eyeballs on all three males, all three
 19 males have been [I think that must be neutralised rather
 20 than utilised] as far as we know. ASAP cordons to keep
 21 the public back."
 22 A. Yes.
 23 Q. So that would appear to be a communication right after
 24 the confrontation with the attackers?
 25 A. It would.

19

1 Q. And if we go, please, to {DC8183/11}, we see this is CAD
 2 8805, and we see an entry made towards the bottom,
 3 22.18.38:
 4 "3 males have been shot. They have something
 5 strapped to chest -- Borough Market."
 6 A. Yes.
 7 Q. Was that a CAD entry made as a direct result of that
 8 radio communication we just saw?
 9 A. Yes.
 10 Q. Then following the chain through, may we now look at
 11 {WS5016/17}. This is your workbook, I think; is that
 12 right?
 13 A. Yes, it is.
 14 Q. And if we look down the page, we can see first of all
 15 a reference to "Multiple casualties on the footway of
 16 London Bridge."
 17 A. Yes.
 18 Q. Next, "motor vehicle crashed outside Southwark
 19 Cathedral."
 20 A. Yes.
 21 Q. And then this:
 22 "3 suspects decamped and shot in Borough Market."
 23 A. Yes.
 24 Q. So the confrontation happens, we know, just before
 25 17 minutes past, it's recorded on the CAD at 18 minutes

20

1 past, and you hear of it practically immediately?
 2 A. Yes, whilst I'm in the control room I'm not listening to
 3 the radio channels live time and the timings on the CAD
 4 can often be subject to small variations due to the time
 5 it takes for the operator to log them in, and my
 6 awareness, that's recorded there at 22.19, is of the
 7 Plato declaration.
 8 Q. Can we take it though the fact that you have written
 9 Plato declaration 22.19 suggests you knew of the
 10 shooting by 22.19?
 11 A. Yes, I would say that obviously my note above "3
 12 suspects decamped and shot in Borough Market", is
 13 indicative of that also.
 14 Q. Now, you have noted the Operation Plato declaration and
 15 timed it at 22.19. Is that the time it was brought to
 16 your attention?
 17 A. Yes, it is.
 18 Q. We understand it was made by the Metropolitan Police
 19 officer, Mr McKibbin, a few minutes earlier; would that
 20 make sense?
 21 A. That would make sense, yes.
 22 Q. Did City of London officers then come under the
 23 Metropolitan Police's command?
 24 A. Yes.
 25 Q. Directed, as we've heard, by V134 in the ARV pod?

21

1 A. Yes, that is correct.
 2 Q. Can we see in your workbook you immediately note the MPS
 3 command and the names of the officers which have been
 4 blacked out?
 5 A. Yes.
 6 Q. What was your role from that point in the evening?
 7 A. My role was then to coordinate the City of London Police
 8 resources, both those which were on the ground,
 9 effectively working to the Met command structure, but
 10 also then to mobilise additional resources to assist
 11 with the events that immediately followed.
 12 Q. In terms of the gold, silver, bronze command structure,
 13 what roles or role did you have?
 14 A. That's a slightly difficult question to answer because
 15 of the transfer of command for the assets under the
 16 armed asset mobilisation plan, but in terms of the wider
 17 City of London resources, I retained strategic command.
 18 Q. So you were gold for the City of London Police response?
 19 A. In effect, yes.
 20 Q. Was there a silver commander for the City of London
 21 Police response on the ground?
 22 A. Yes, there was.
 23 Q. Who was that?
 24 A. Inspector Jo Northmore.
 25 Q. When did she get to the scene?

22

1 A. She was the on-duty duty officer and was on the bridge,
 2 and as can be seen from the radio communications was
 3 actively engaged in the emergency response.
 4 Q. You record in your witness statement that she was at the
 5 scene no later than 10.14; is that right?
 6 A. Yes.
 7 Q. Moving now to what happened after the Operation Plato
 8 declaration, where were you sending City of London
 9 Police units from that point?
 10 A. Everything that the City of London Police had on duty
 11 that night was deployed in response to this incident.
 12 It was the additionality of resources that enabled me to
 13 resource other functions that were subsequently
 14 required, but everything we had was deployed in response
 15 to this incident.
 16 Q. When you say "additionality of resources", do you mean
 17 that you threw your existing on-duty officers at this
 18 incident and then brought in other support from
 19 elsewhere to police the rest of the City?
 20 A. Yes, in effect there were no police officers left to
 21 respond to other incidents at this point. One of my
 22 concerns was, in light of the incident that had been
 23 experienced to ensure that we had firearms cover north
 24 of the river, and that was requested and agreed by the
 25 Metropolitan Police, and the additional resources were

23

1 called in mainly from home on an on-call basis to
 2 provide resilience.
 3 Q. Was there particular value in sending your officers to
 4 the scene even if that left the City effectively to be
 5 covered by Metropolitan Police units, they were likely
 6 to be close?
 7 A. Yes, as London Bridge is part of our force area, we are
 8 a much smaller force area, and so it follows that our
 9 officers, even travel distance was going to be much
 10 shorter.
 11 Q. In those minutes after the Plato declaration as you were
 12 directing the officers to the scene or as the operators
 13 were under your command, can you give us an impression
 14 of the scene in the control room, how it was?
 15 A. Exceptionally busy. Keeping track on the locations of
 16 assets, which assets had agreed to attend, which assets
 17 had attended, there was an extremely high volume of
 18 radio traffic and personally there was information
 19 overload coming into myself at some points.
 20 Q. As an example of that information overload, can we see
 21 towards the bottom of this page presently on screen in
 22 your workbook, the first main page, that you have
 23 entered:
 24 "Potential ongoing hostage situation on [the south]
 25 side of the bridge."

24

1 A. Yes.
 2 Q. Of course we know that there wasn't in fact a hostage
 3 situation?
 4 A. Indeed.
 5 Q. Was that an example of confusing and potentially
 6 distracting information coming in?
 7 A. Yes, there was both high volume and conflicting
 8 information coming into the control room, indicating
 9 whether this was a single seated incident or whether
 10 there were multiple incidents occurring. This is just
 11 an indication of that such information.
 12 Q. Was your control hub also involved in organising
 13 something called a survivor reception centre?
 14 A. Yes, they were.
 15 Q. We can look at page 18, please, of the same document,
 16 your workbook. Can we see at the top the acronym SRC,
 17 and a reference to the Andaz hotel?
 18 A. Yes, that is correct.
 19 Q. Was that one of a number of prearranged locations that
 20 could be used as a survivor reception centre?
 21 A. Yes, the City of London Police holds a list of locations
 22 which we have assessed as being suitable for holding as
 23 survivor reception centre and on this occasion the Andaz
 24 seemed an appropriate location.
 25 Q. Why was it chosen?

25

1 A. It was chosen because it was not that far from the
 2 scene, it offered us good resources, but it was far
 3 enough from the scene as not to conflict and it was
 4 close proximity to Bishopsgate Police Station which was
 5 obviously going to be an arrival point for many of the
 6 incoming staff.
 7 Q. The clue may be in the title, survivor reception centre,
 8 but what is the function of a survivor reception centre
 9 during a major incident?
 10 A. The survivor reception centre is an integral part of
 11 trying to deconflict the information flows. We would
 12 wish that people that have been involved in an incident
 13 but those that are not requiring emergency first aid,
 14 could go through the survivor reception centre where we
 15 could collate their information, which can then be used
 16 in conjunction with the casualty bureau function, later
 17 set up, to ascertain those that are involved or likely
 18 to have been involved in an incident.
 19 It also provides the function of tendering lower
 20 level first aid to people that may well be involved.
 21 Q. May we look, please, at {DC8183/17}. Can we see from
 22 this CAD and the entry at 22.44 that witnesses were
 23 being sent to the Andaz hotel by 10.44?
 24 A. Yes.
 25 Q. So the survivor reception centre was already established

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1 by that point, was it?
 2 A. Yes.
 3 Q. You were aware that firearms officers from your force
 4 had been involved in a confrontation in which attackers
 5 or suspects had been shot. Were you aware, made aware,
 6 that post-incident procedures were going to be followed
 7 for those officers?
 8 A. Yes, that was very important for me to ensure that our
 9 officers were admitted into the PIP process that was
 10 going to take place, conducted and coordinated by the
 11 Metropolitan police.
 12 Q. Can we return to your workbook, please, {WS5016/18}.
 13 Can we see towards the bottom of this page that you had
 14 recorded that "our [firearms were] involved", and you
 15 have identified the name of the post-incident manager
 16 who would be dealing with the procedures?
 17 A. Yes, the reference to "our firearms involved" is
 18 an amendment to an earlier entry in my workbook where at
 19 that point I was aware that whilst we had responded,
 20 I was not aware that they had individually been engaged
 21 to the extent which they had and that is an amendment of
 22 that, and yes, I was identifying that they had the
 23 necessary appropriate support in the form of a PIM.
 24 Q. And in very brief terms, is the post-incident procedure
 25 designed to address both the welfare needs of officers

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1 who had been involved in a confrontation, such as
 2 a fatal confrontation, and also with a view to ensuring
 3 that their evidence is taken properly both for the
 4 investigation and any review of what went on?
 5 A. Yes, both are equally important functions of the
 6 post-incident procedure.
 7 Q. Were steps also taken to set up a casualty bureau,
 8 something you've referred to already?
 9 A. Yes, they were.
 10 Q. If we move to the next page of your log, page 19 of the
 11 document {WS5016/19}, do we see at the top the initials
 12 CB, indicating work was being done on setting up
 13 a casualty bureau?
 14 A. Yes, the entry M-- that should be MN, "from home", that
 15 was me calling in our casualty bureau manager,
 16 an extremely experienced member of staff in this area,
 17 and the entry down below, FANY, is for the Freeman's
 18 Association Nursing Yeomanry who are a volunteer group
 19 which staff our casualty bureau, again a hugely
 20 experienced and valuable asset to the City of London
 21 Police.
 22 Q. What is a casualty bureau, in simple terms?
 23 A. A casualty bureau, whilst it has strands beneath it, it
 24 can be collectively described as effectively a call
 25 centre which enables people to ring in, normally in

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1 result of a published number, and pass information. It
 2 is there to receive information rather than provide
 3 information, and it is a collection point for people
 4 ringing in potentially reporting that somebody they know
 5 or a loved one may well be caught up in the incident.
 6 Q. Then 23.40, so shortly before midnight, did you record
 7 in your log asking for a headcount of City of London
 8 Police officers on duty and having them all accounted
 9 for?
 10 A. Yes, that was important for me to get confirmation of
 11 the welfare of my staff, but equally through that
 12 process to get a kind of snapshot as to where they were
 13 and what their commitments were at that time.
 14 Q. Then the entry at 00.05, so just after midnight, you
 15 recorded here that you confirmed that Trojan City 1 had
 16 engaged with "x ray", which I think means hostiles?
 17 A. It does.
 18 Q. And you had confirmed that your officers were all okay?
 19 A. Yes, I -- "all ok" is perhaps an indistinct term to use
 20 at that point, but it was confirmation that they weren't
 21 injured.
 22 Q. And then shortly after that, was a concern arising that
 23 there might be a secondary attack?
 24 A. Yes. As I said, it continued to be a very confusing
 25 period with reports of potential other -- potentially

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1 linked incidents and so part of my responsibility,
 2 knowing that our firearms officers were now engaged in
 3 a post-incident process, was that we had cover in the
 4 form of firearms teams within our force area.
 5 Q. With that in mind did you obtain confirmation that there
 6 was going to be firearms cover on the north side of the
 7 bridge, on the north side of the river for the City,
 8 given all your officers were deployed to the incident?
 9 A. Yes, that's correct.
 10 Q. Then moving down the page, do we see at 00.40, so at
 11 12.40, you had a conference call with senior colleagues
 12 both at the City of London Police and the
 13 Metropolitan Police?
 14 A. Yes.
 15 Q. Identifying the number of scenes, the three attackers
 16 shot, and then "none OS". Does that indicate that you
 17 believed by that stage that there were no remaining
 18 attackers involved?
 19 A. Yes, "OS" in my notation refers to outstanding, so no
 20 suspects believed outstanding at that time.
 21 Q. So by that time the belief was that all the attackers
 22 had been confronted and neutralised?
 23 A. Yes.
 24 Q. Was that a confident belief by that stage?
 25 A. Based upon the information available at that point, it

30

1 was the best guess, I would imagine.
 2 Q. You had identified the false body-worn improvised
 3 explosive devices; yes?
 4 A. Yes.
 5 Q. And you noted that the incident had been declared
 6 a terrorist incident at 00.25.
 7 A. Yes.
 8 Q. Is that a formal declaration that has to be made at
 9 a high level?
 10 A. Extremely high level. To declare something a CT
 11 incident can only be conducted by the senior national
 12 coordinator or their designated deputy. So that is
 13 a formal declaration of the incident being treated and
 14 managed as a counter terrorism incident.
 15 THE CHIEF CORONER: I think the first name we see after
 16 00.40 is "D Haydon" --
 17 A. That's correct.
 18 THE CHIEF CORONER: -- which would have been that person at
 19 that time?
 20 A. I'm not sure when he assumed that role. He holds that
 21 role now but I can't remember whether he was of that
 22 role at that time.
 23 MR HOUGH: I think he was a commander at the time.
 24 A. I think he was of SO15 Counter Terrorism Command.
 25 Q. And then over the page in your workbook at {WS5016/20},

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1 you use the word "staffing to critical"; what does that
 2 mean in simple terms?
 3 A. The threat level within the UK is a process managed by
 4 JTAC and at times and often, or on occasions in response
 5 to terrorism incidents, the threat level can be raised.
 6 That notation is prior to a subsequent Cobra meeting
 7 which took place later that morning, but it was
 8 a discussion between myself and the assistant
 9 commissioner with regards to anticipating the potential
 10 or likelihood of the need to raise to critical and that
 11 we would need designated command teams and three ARV
 12 cover, which is just part of our move to critical in the
 13 event of being given such a direction by JTAC.
 14 Q. Because when the UK threat level is raised to critical,
 15 a number of forces have specific staffing plans that
 16 respond?
 17 A. I would hope that all forces have staffing plans that
 18 react to a declaration of critical status.
 19 Q. Yes. Then shortly afterwards in the morning, 01.15, do
 20 we see you record a conference call with the Assistant
 21 Commissioner of Special Operations of the
 22 Metropolitan Police Service, who I think at that stage
 23 was Mr Rowley?
 24 A. That's correct.
 25 Q. Once again, summarising the basic facts, including now

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1 recognising that a British Transport Police officer had
 2 been stabbed?
 3 A. Indeed.
 4 Q. That call referred to a potential vehicle in convoy with
 5 the attack vehicle. We know that that was subsequently
 6 checked out and found not to be right but, again,
 7 another piece of potentially confusing information still
 8 being dealt with at that stage?
 9 A. I think, again, it indicates just the frenetic pace with
 10 which actions were being taken in order to progress the
 11 investigation from the very early stages.
 12 Q. Then over the page, please, {WS5016/21}, you record:
 13 "Specials to be stood up."
 14 Does that concern the mobilisation of special
 15 constables?
 16 A. Yes, it does. We are fortunate within the City to be
 17 supported by a number of able special constables and
 18 anticipating the pressure to be placed upon core
 19 business as usual resources, that was a request via
 20 their management to scope their availability resources
 21 to support.
 22 Q. At 2.00 am we see you made notes of a mature assessment
 23 of the incident, going back over it and the command
 24 structure and so on?
 25 A. Yes.

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1 Q. And then {WS5016/23}, please. Later into the morning
 2 did you instruct a formal debrief procedure?
 3 A. Yes, I did. It's important for a number of reasons to
 4 conduct these debriefs. Where information could
 5 potentially be lost, that is an opportunity for the
 6 debrief to capture that. It's equally important to
 7 provide an opportunity to check in on the welfare of
 8 staff that have been involved in this incident, and that
 9 was my reason for my directions.
 10 Q. After that, as you record in your logbook, did you
 11 personally visit the survivor reception centre and the
 12 casualty bureau?
 13 A. Yes, I did.
 14 Q. How were both of those being run, as you visited?
 15 A. The survivor reception centre, by this point the numbers
 16 had thinned out that were actually going through there.
 17 My note of sufficient staff is a reflection of those
 18 reducing numbers.
 19 The casualty bureau, the staffing numbers that had
 20 occupied those spaces so quickly was, frankly,
 21 fantastic, and what we were very conscious of in respect
 22 of the casualty bureau though is that the timing of this
 23 incident, and as is common in other occasions when
 24 casualty bureaux are deployed in response to mass
 25 casualties incidents, as people wake up to the incident,

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1 the flow of calls can change as well. So the flow of
 2 information fluctuates with the casualty bureau and it
 3 was important they were correctly resourced.
 4 Q. Then {WS5016/24} at the top, please, did you record from
 5 one of your colleagues information about the number of
 6 casualties?
 7 A. Yes, the entry at 05.15 is from Bill Duffy, William
 8 Duffy, a City of London Police officer who I had
 9 dispatched to the special operations room at Lambeth to
 10 act as a conduit between the organisations.
 11 Q. Establishing there that 48 had been hospitalised?
 12 A. Yes.
 13 Q. 20 with severe injuries?
 14 A. Yes.
 15 Q. And 9 then known to be deceased, including the
 16 attackers?
 17 A. Yes.
 18 Q. Did you then continue on duty in your role until around
 19 midday?
 20 A. Yes, I did.
 21 Q. We can take your workbook off screen now.
 22 Overall, reflecting on that night, what was your
 23 view of the performance of the control hub over which
 24 you were presiding?
 25 A. I'm very proud of the response of all of the City of

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1 London Police officers, inclusive of the control hub.
 2 It was an exceptionally busy incident, to which to
 3 respond, probably unprecedented since 7/7 for the
 4 control room to be part of the response to that, because
 5 it is not always that the City of London Police would
 6 become so involved in an incident, but the location
 7 meant that all of our resources were deployed and so it
 8 was extremely testing for everyone involved, the control
 9 room I think performed well, and the information flows,
 10 whilst always being subject to the frenetic pace to
 11 which I've referred, I think they did exceptionally
 12 well.
 13 Q. And the officers on the ground, including those officers
 14 who just before 10.17 stopped the attackers in their
 15 tracks?
 16 A. I can't speak highly enough of their actions. It's
 17 often spoken about that first responders are running
 18 towards the danger whilst others are moving away. Our
 19 officers initially thought they were responding to
 20 a road traffic collision. What they ended up dealing
 21 with was obviously far, far bigger.
 22 Q. And in terms of the response time from those initial
 23 calls coming in to the armed officers finding,
 24 confronting and shooting the attackers, what was your
 25 view of that?

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1 A. I think the time -- the time we took, obviously it was
 2 tragic that people had lost their lives within that
 3 intervening period and we will never be able to revisit
 4 that period, however, I think the time by which we
 5 delivered an effective policing response was
 6 exceptional.

7 Q. Have you nevertheless conducted extensive post-incident
 8 debrief procedures in order to learn lessons in any way
 9 you can from this incident?

10 A. Yes. As I previously referred, I think the debriefing
 11 is very important. It is fortunately rare that these
 12 events take place and it is not every officer within the
 13 organisation that can inevitably be involved. However,
 14 these incidents do offer us an opportunity to reflect
 15 upon what we have done, what we have done well and what
 16 we could have done better, and it is really important
 17 that we're honest and very open both within and with our
 18 partners in recognising that and then seeking to
 19 place remedy where possible.

20 Q. Can we have on screen briefly {DC8308/1}. Can we see
 21 here a living document, I think, a debrief procedure
 22 which is updated with information about responses to
 23 debriefs and recommendations?

24 A. Yes, a structured debrief is coordinated in a way that
 25 enables those participants to have a free recall without

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1 necessarily recourse to rank or any structure within the
 2 organisation, and it's a real open opportunity for us to
 3 recognise opportunities going forward.

4 Q. Just to give us some examples of the type of
 5 improvements that are considered and made, can we have
 6 {DC8308/5} on the screen, please. Item 7, can we see
 7 that one issue that was raised concerned an ability to
 8 link the radio channels immediately with command and
 9 control for all of London in major incidents?

10 A. Yes, I think we've spoken of the radio channels and the
 11 density of radio traffic. One of the very soon outcomes
 12 of these debrief procedures and indeed with our
 13 colleagues in the Metropolitan Police was establishing
 14 a more streamlined radio process for which we can
 15 respond to such incidents.

16 In addition, and noting the comments with regards to
 17 our specific involvement in the resolution of the
 18 incident, we now also have the ability to monitor the
 19 Metropolitan Police firearms channel within our force
 20 control room on an ongoing basis.

21 Q. Can we see the various upgrades and changes to
 22 procedures which are set out in the final column,
 23 showing changes of both procedures and to equipment,
 24 including radios updated with a hot key?

25 A. Yes, that's correct.

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1 Q. Then item 8, can we see that there's a recommendation
 2 for biannual table-top exercises including in relation
 3 to marauding terrorist attacks?

4 A. Yes, that is correct.

5 Q. And then in the final column, recognition that a whole
 6 series of additional training sessions have been
 7 developed and delivered?

8 A. Yes.

9 MR HOUGH: We can take that off screen. Thank you very
 10 much, those are all my questions. As I say, there may
 11 be some more.

12 Questions by MR PATTERSON QC

13 MR PATTERSON: Commander, I ask questions on behalf of the
 14 families of six of those who lost their lives during the
 15 attack.

16 There are two topics, please, that I would like your
 17 help with. First of all, CCTV, and in asking these
 18 questions, I understand from counsel for the City of
 19 London Police that you are alive to any sensitivity
 20 issues.

21 A. Indeed.

22 Q. And no doubt will answer accordingly, and of course
 23 I don't in any way want to do anything that would
 24 jeopardise the effective functioning of your counter
 25 terrorism operations, but if you can help, please, in

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1 terms of public protection issues, as I understand it,
 2 there is a large body of CCTV camera capability within
 3 your jurisdiction?

4 A. That's correct.

5 Q. Within your area?

6 A. Correct.

7 Q. And you've given us the boundaries of your area.

8 Presumably we're talking about hundreds if not thousands
 9 of cameras?

10 A. I'm -- I would not wish to go into the specific number
 11 of cameras but there are a substantial number of cameras
 12 within the City of London area.

13 THE CHIEF CORONER: And by cameras, Mr Patterson, you're
 14 including not just those which are, as it were, on
 15 public buildings, but those which may be, for example,
 16 on the front of individual private premises, so
 17 I'm thinking, for example, of an office block which may
 18 have a perfectly proper CCTV system.

19 MR PATTERSON: Yes.

20 THE CHIEF CORONER: And we know because we have seen some
 21 images that show out, whereas the camera is primarily
 22 looking at what is going on in the building.

23 MR PATTERSON: That is right, and obviously that is very
 24 important for an investigator after the event.

25 THE CHIEF CORONER: Yes.

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1 MR PATTERSON: But in terms of real time monitoring,
 2 presumably you have access to a large bank of screens in
 3 your command hub?
 4 A. A number of screens capable of receiving multiple camera
 5 inputs simultaneously, yes.
 6 Q. Yes. Is there the potential for there to be real time
 7 monitoring?
 8 A. Yes.
 9 Q. And is it going on?
 10 A. Again, I'm not wishing to speak about the mode of
 11 monitoring of the CCTV within the City of London, but it
 12 is monitored.
 13 Q. You appreciate that it's one thing if it's being
 14 monitored 24/7 by a large number of individuals, it's
 15 another thing if it's one individual trying to search
 16 for a needle in a haystack with thousands of cameras;
 17 you see the point I make?
 18 A. I see your point, yes.
 19 Q. Is there the potential for this resource to be improved
 20 to try to maximise the possibility of picking up any
 21 suspicious activity?
 22 A. The number of cameras available and, indeed, the
 23 technology available, would always exceed the number of
 24 people that would be committed to this particular task.
 25 Q. Yes. I appreciate that. But to take, perhaps, one end

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1 of the spectrum, if it's one person trying to monitor
 2 thousands of cameras covering a large area, it's of
 3 little effect; would you agree?
 4 A. I would not agree with your assertion in respect of
 5 that. I think the City of London has a proven use of
 6 closed circuit television. The City of London has
 7 a proven history in respect of its approach to counter
 8 terrorism and protective security in instigation of the
 9 Ring of Steel back in the early 90s and continues to be
 10 at the forefront of trying to build a strong, protective
 11 security stance for the City of London.
 12 Q. Have any improvements been made since the night of the
 13 attack?
 14 A. The -- we're always looking to improve our use of both
 15 technology and our force control room. Our force
 16 control room moves next month to a new location within
 17 Bishopsgate Police Station and we have an ongoing and
 18 significant programme under the banner of Secure City
 19 which is looking to evolve protective security
 20 arrangements within the City of London on an ongoing
 21 basis.
 22 Q. Have any lessons to be learned been identified in terms
 23 of the suspicious movements of that Hertz rental van
 24 that wasn't picked up on the night?
 25 A. I do not necessarily agree with you on the assertion of

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1 there being suspicious movements within the City of
 2 London. It is highly common for light goods vehicles of
 3 that nature to be within the force area, and, indeed, it
 4 is advocated by the local authority for businesses to
 5 consider out of hours and weekend deliveries in order
 6 that we can manage the overall traffic density within
 7 the City of London.
 8 Q. But have you considered the movements of the van?
 9 A. The specific movements of this van on this occasion?
 10 Q. Yes, there were a number of unusual features of the
 11 movements of that van?
 12 A. I would not describe them as unusual, sir.
 13 Q. So have you considered them?
 14 A. In hindsight, yes, and reflecting upon the movements
 15 known since, but not at the time, obviously.
 16 Q. Yes. Yes. I appreciate it's very difficult to spot
 17 anything in these situations. All I'm asking is, have
 18 you looked and considered whether anything can be done
 19 where you have, perhaps, a van parked up for a period of
 20 time, where you have hazard warning lights flashing for
 21 a period of time, where you have odd manoeuvres in
 22 different places where the van appears to be lost,
 23 things of that sort, covering different streets more
 24 than once?
 25 A. We have examined the potential of looking at where

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1 a vehicle has moved down a road more than once, but as
 2 you will appreciate, the false positives that exist
 3 because of the nature of traffic movements with many
 4 vehicles passing down the same highway multiple times
 5 during any given time.
 6 With regards to the other aspects to which you
 7 refer, with regards to it being stopped and with hazard
 8 lights on, as I said, we see an awful lot of light goods
 9 vehicle movements similar to that van within the City on
 10 an ongoing basis.
 11 Q. Of course, but you have applied your mind to whether
 12 there is any room for improvement?
 13 A. We would seek improvement wherever we could.
 14 Q. Yes. The second topic I would like your help with,
 15 please, is the two ARVs that were on duty that night?
 16 A. Yes.
 17 Q. And no doubt you would agree that those two ARVs that
 18 the City of London Police had on duty represent a very
 19 important resource --
 20 A. Indeed.
 21 Q. -- in keeping the public safe from terrorism?
 22 A. Yes.
 23 Q. In the busy City centre?
 24 A. Well, in -- within the City of London Police area, but
 25 also as, in this incident, when required as part of the

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1 wider London policing plan.
 2 Q. Yes, but you appreciate that the City centre contains
 3 a number of areas which are potentially terrorist
 4 targets?
 5 A. I think history reflects that the City of London has,
 6 for a long time, been a target for terrorist activity .
 7 Q. Yes. And we will be analysing next week the particular
 8 target on London Bridge itself , which is within your
 9 jurisdiction , isn't it?
 10 A. London Bridge is, yes.
 11 Q. And this is particularly important as a resource, these
 12 ARV vehicles, the two that you had on duty that night,
 13 in the context of other police officers not being
 14 routinely armed?
 15 A. The City of London, like many other forces, like all
 16 other forces, is a model where we have specialist
 17 firearms trained officers , whereas the rank and file , as
 18 I shall refer to them, are not routinely armed, yes.
 19 Q. Exactly.
 20 Now, the vehicle that engaged with the attackers and
 21 shot them, bringing to an end the attack at 10.16, was
 22 Trojan City 1, one of your two City of London ARVs?
 23 A. Yes.
 24 Q. The other ARV was Trojan City 2, and it arrived very
 25 quickly on to the bridge at 10.11, or thereabouts; would

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1 you agree?
 2 A. Yes.
 3 Q. And we've been helpfully provided with a CCTV report
 4 which analyses the times of the movements of that second
 5 ARV.
 6 A. Yes.
 7 Q. I'm looking for any of those who are following this in
 8 the report. It's not on Opus yet, I'm told, but on
 9 page 3 we see the car pulling up at 10.11.29. So this
 10 is five minutes before the three attackers were engaged,
 11 shot and their terrorist rampage was brought to an end.
 12 THE CHIEF CORONER: Can I just check, Mr Patterson, that the
 13 witness has got the document you're referring to.
 14 A. I presume...
 15 MR PATTERSON: Is that -- you have a copy?
 16 A. Is this the same document?
 17 MR HOUGH: It's a document created 12 May 2019, "Movements
 18 of Trojan City 2 ARV".
 19 A. Yes, I have that document, thank you.
 20 MR PATTERSON: I'm looking, officer, it's not paginated, at
 21 page 3.
 22 A. Yes.
 23 Q. So at about 5 minutes before the end of the attack, that
 24 other ARV arrives on the bridge and, as we know, the two
 25 officers got out of the car; yes?

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1 A. Yes, they did.
 2 Q. We heard in evidence from one of them, Police Constable
 3 Duggan, who told us that he and his colleague,
 4 PC Mahmout were armed both with their side arms and in
 5 their vehicle two automatic rifles , at least, Heckler
 6 and Koch automatic rifles ; is that correct?
 7 A. Yes, the standard weaponry carried within an armed
 8 response vehicle .
 9 Q. And he confirmed in his evidence, did PC Duggan, that
 10 they were the first of the ARVs to get to the bridge.
 11 A. I am not aware of PC Duggan's specific evidence but, in
 12 fact , if you are telling me that's what he said.
 13 Q. Now, the other vehicle , are you aware of this , we've
 14 seen statements from the officers in the other vehicle ,
 15 BX44, 45 and 46, who confirmed that there was a slight
 16 delay in them setting off for the scene because they
 17 were engaged in a road traffic stop, they had to deal
 18 with that before they could set forward to come to the
 19 scene; is that correct?
 20 A. They were involved in a stop which had been generated as
 21 a result of an ANPR activation of a suspect that -- or
 22 a person potentially linked to that vehicle as a suspect
 23 would had been involved in a knife-related GBH offence.
 24 Q. So there was that slight delay before they could begin?
 25 A. I don't think there was a delay because they had already

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1 had the resource towards them because they needed
 2 a female officer to conduct a search and so I don't
 3 agree that there was a delay in their dispatch.
 4 Q. I'm simply relying on their witness statement where they
 5 say they had to deal with that before they could set
 6 off.
 7 In any event, if we could look at the map, please,
 8 {MP0003/1}. The first of the two ARVs that contained
 9 Police Constable Duggan, we can see the bridge where it
 10 arrived and where he and his colleague got out, and we
 11 can see the scale on the map at the bottom right; do you
 12 see that, Commander?
 13 A. Yes.
 14 Q. So we can see that from where they got out somewhere
 15 onto the bridge, it's not entirely clear where
 16 precisely, but a little way onto the bridge, coming from
 17 the north, that they were about 200 or 300 metres short
 18 of the Boro Bistro area where the early stages of the
 19 stabbing attack took place?
 20 A. Yes.
 21 Q. And then as the attackers emerged after that part of the
 22 attack, we know that they headed south and carried on
 23 down the Borough High Street and round into
 24 Stoney Street, along Stoney Street, various people being
 25 stabbed at this stage, an attack in the Black & Blue at

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1 the end of their journey down Stoney Street before
 2 coming back down and into Borough Market and then
 3 eventually being engaged by the second vehicle, Trojan
 4 City 1?
 5 A. Yes.
 6 Q. And so despite PC Duggan and his colleague having got to
 7 the bridge so early, at 10.11, and despite being just
 8 a few hundred yards from where the terrorists were
 9 continuing their attack, PC Duggan told the court that
 10 they got out and began to triage?
 11 A. Yes.
 12 Q. And in his evidence it emerged that they didn't head
 13 south for something like 10 minutes, and from the CCTV
 14 report that you have with you there, we know that it was
 15 at something like 10.21 before they got back into the
 16 car and headed south.
 17 A. Yes.
 18 Q. By which stage it was something like five minutes after
 19 the engagement that had taken place on Stoney Street.
 20 A. Yes, I think it's important to note here, though, that
 21 PC Duggan and his crew member were initially thinking
 22 they were responding to a road traffic collision and had
 23 come across ultimately fatally injured people and
 24 critically injured people and so were rendering first
 25 aid to those parties that they came across.

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1 Q. That's right, and I want to ask you about that. There
 2 were three different radio channels that were
 3 considered.
 4 A. Yes.
 5 Q. And I'm sure you have read the transcript of Police
 6 Constable Duggan's evidence?
 7 A. Yes.
 8 Q. So first of all he told us that he was listening to the
 9 City Ops 1 channel which you've referred to already this
 10 morning?
 11 A. Yes.
 12 Q. So a radio channel used by City of London Police
 13 officers?
 14 A. Yes, it's the main working channel for the City of
 15 London Police.
 16 Q. And at {DC7288/1}, please, about a third of the way down
 17 we can see a reference from a police officer, and it may
 18 be this is Trojan City 1, I think that was our ... yes,
 19 I'm told by counsel for the City of London Police that
 20 it is. So it's the other ARV that ultimately did go and
 21 engage and neutralise the attackers, speaking about:
 22 "If it's [this] serious we need relieving
 23 considering what happened Westminster Bridge over."
 24 Do you see that?
 25 A. Yes, I do.

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1 Q. Those officers were saying on this channel which
 2 PC Duggan and his colleague were using that, first of
 3 all, they needed relieving; is that a reference to what
 4 I was asking you about earlier, that they had this other
 5 incident that they were dealing with?
 6 A. It is.
 7 Q. And, secondly, immediately drawing attention to the
 8 possibility that this might be a terrorist attack
 9 because he refers to the recent Westminster Bridge
 10 events?
 11 A. He's referring to the Westminster Bridge. Whether at
 12 that point he had identified this incident also as being
 13 a terrorist incident I think is unclear from that entry.
 14 Q. Yes.
 15 A. So I think one of the aspects of the firearms officers
 16 is they are highly trained medics, to a significantly
 17 superior level to that of ordinary police officers, so
 18 I don't -- I can't draw your same conclusion just from
 19 that entry on the log.
 20 Q. Well, it's certainly a reference to Westminster Bridge,
 21 which in context is clearly the terrorist attack some
 22 months earlier; would you agree?
 23 A. It was, but it was equally an incident in which people
 24 required a lot of first aid.
 25 Q. They did. They did. Now, Police Constable Duggan said

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1 he didn't hear that, even though that was the channel he
 2 was using.
 3 Secondly, he said that they were using the Trojan 99
 4 channel.
 5 A. Yes.
 6 Q. And I think you've referred to that as well today in
 7 your evidence already; is that correct?
 8 A. Yes.
 9 Q. And he said in his evidence that "we would monitor that
 10 channel", which as I understand it is
 11 a Metropolitan Police channel for firearms officers; is
 12 that correct?
 13 A. Yes, it is.
 14 Q. And he said in his evidence:
 15 "I think I would have had that channel on."
 16 And so can we go to that, please, {DC7287/1}. So
 17 this is the document, and if we go, please, to
 18 {DC7287/46}, we can see a reference to it being
 19 a firearms channel, and we have a number of entries on
 20 this channel in this schedule. You can see the
 21 references there, Commander, to 99 --
 22 A. Yes.
 23 Q. -- to the channel in question.
 24 If we go, please, to {DC7287/52}, confirmation that
 25 it was being used by Police Constable Duggan appears

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1 there with those entries in relation to his ARV, Trojan
 2 City 2. Do you see that?
 3 A. Yes, I do.
 4 Q. So confirming that they had received, for example,
 5 a message at the top of the page?
 6 A. Yes.
 7 Q. And so if we go back, please, to {DC7287/48}, towards
 8 the bottom of the page it was being broadcast on that
 9 Trojan 99 channel that this was considered as a CT
 10 incident; do you see that?
 11 A. Yes.
 12 Q. Down at the bottom of the page.
 13 "For all units ... at this moment in time Chief
 14 Inspector Iyage [is] considering this as a CT, as a CT
 15 incident."
 16 Police Constable Duggan told the court that that
 17 meant to him that it was a terrorist incident, but that
 18 he said that he didn't hear that either.
 19 If we go, please, to {DC7287/51}. Yes, we have that
 20 there. Again, on this Trojan 99 channel, the middle of
 21 the page:
 22 "At present ARVs are to go to the scene, find out
 23 what is happening and act appropriately at the moment."
 24 Do you see that?
 25 A. Yes.

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1 Q. And, again, Police Constable Duggan told the court that
 2 he didn't hear that either. He said:
 3 "I am afraid I didn't and if I had, we would have
 4 done it."
 5 In other words, they would have proceeded and acted
 6 accordingly, obviously tried to locate and engage with
 7 the attackers; yes?
 8 A. Yes.
 9 Q. And just below that, near the bottom of the page, again,
 10 still on the 99 channel:
 11 "I want at least two units to head towards Southwark
 12 Cathedral if not 3 please."
 13 So, again, that was a request, wasn't it, on this
 14 firearms channel that at least two, if not three of
 15 these important vehicles, these ARV vehicles, should
 16 proceed to the cathedral on the south side of the river
 17 where, as we know, the stabbing attack had begun --
 18 A. That is (inaudible).
 19 Q. -- near the cathedral? And that's picked up by Trojan
 20 City 1, clearly, because their reply is:
 21 "Yeah show Trojan City 1."
 22 In other words, yes, we've picked it up. Then over
 23 the page, please {DC7287/52} the reply to that comes
 24 from Trojan City 2:
 25 "Trojan received [something that's inaudible, and

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1 then] urgent."
 2 Now, the crew that did engage and neutralise the
 3 attackers was a three-man crew?
 4 A. Yes.
 5 Q. BX44, 45 and 46. But Mr Duggan, Police Constable Duggan
 6 and his colleague, they were just a two-man crew that
 7 night, weren't they?
 8 A. Yes.
 9 Q. And what he said was: if we had known something
 10 different, I would have done it, is what he said. So if
 11 he had picked up these references to proceeding and
 12 locating, engaging, he would have done just that. He
 13 said if he had known that it was a marauding terrorist
 14 attack he would have proceeded and investigated. That's
 15 what he told the court.
 16 A. I think that position is obviously heavily informed with
 17 hindsight that has taken place since the incident, and
 18 so ...
 19 Q. Yes, he made it plain that he didn't pick up these
 20 comments coming over the radios.
 21 A third channel that was used, he told us, was a BTP
 22 channel, so we're now on a third police force. We've
 23 dealt with the City of London, we've dealt with the
 24 Metropolitan Police. A BTP channel, {DC6842/1}, please,
 25 and you mentioned this earlier, I think, didn't you,

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1 Commander?
 2 A. Yes.
 3 Q. And in relation to this we can see that at an early
 4 stage, 22.09, that first entry, there was the reference
 5 to London Bridge, Southwark Cathedral; do you see that?
 6 A. Yes.
 7 Q. And then in the entries that followed:
 8 "We need LAS, someone has just been stabbed."
 9 So clearly not a reference to road traffic -type
 10 injuries but a very different type of attack; would you
 11 agree?
 12 A. Yes, I would.
 13 Q. And then in the entries that follow on this BTP channel:
 14 "We're on Borough High Street, we need LAS urgently.
 15 "... what's the extent of the stabbing ...?"
 16 "Big wound in the back ..."
 17 "Just to confirm [asks control] this is
 18 cathedral ..."
 19 And then in the other entries that follow:
 20 "We've got another person down, we need back up, we
 21 need back up urgently."
 22 "Units start making to London Bridge, we've got two
 23 persons stabbed, over."
 24 Then further down another reference to the
 25 cathedral; do you see that?

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1 A. Yes.
 2 Q. And in relation to that third radio channel, Police
 3 Constable Duggan told the court that this was coming in
 4 but it was on a spare handset that was in his car. And
 5 he was asked about those references that I've just taken
 6 you to and he said that he didn't hear those either, so
 7 a third set of references on a third channel that might
 8 have indicated that this was a terrorist attack and that
 9 there was a need to proceed; would you agree?
 10 A. I would agree that PC Duggan thought he was responding
 11 to a road traffic collision on London Bridge.
 12 Q. That's right.
 13 A. His evidence is that he was not aware of the submissions
 14 that you tendered today, or commented to me today, and
 15 so I think PC Duggan acted appropriately based upon what
 16 he knew.
 17 Q. That's right, he didn't hear these references. So on
 18 the City Police channel he didn't pick up the reference
 19 to Westminster, on the Trojan 99 Met channel he didn't
 20 pick up the references to a CT incident, to go to the
 21 scene and act appropriately, to go to the cathedral, and
 22 on the BTP channel he didn't pick up the references to
 23 the cathedral or the references to stabbings. What he
 24 told the court was this:
 25 "We were at a disadvantage. We only had two in our

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1 car."
 2 So help us: why was he placed at a disadvantage when
 3 he was sent out on duty that night in his ARV?
 4 A. ARVs are crewed in London with three members of staff.
 5 On this occasion, the third member of staff had reported
 6 sick and was unable to start their shift.
 7 Q. Would you agree that it would have assisted if there had
 8 been a third person in the car?
 9 A. I can't comment upon that.
 10 Q. Well, would you agree with this: that the likelihood of
 11 one of those, just one of those messages being picked up
 12 would increase if there was an extra set of ears in the
 13 car?
 14 A. Again, I can't possibly comment upon that.
 15 Q. But it's possible, isn't it?
 16 A. I can't comment upon that.
 17 Q. It's possible that it would have been picked up if there
 18 had been an extra person there?
 19 A. Again, I cannot comment upon that.
 20 Q. Would you agree with this: that given that the City
 21 Police only had two ARVs on duty that night, it's
 22 unfortunate that one of them was understaffed?
 23 A. I'm sure that every time that we go to duty, full
 24 resourcing is obviously our stated plan. On this
 25 occasion, due to sickness, that was not possible.

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1 Q. The fact that there were three forces featuring, the
 2 Met, the City and the BTP, with at least three different
 3 relevant channels for these ARV officers, City Ops 1,
 4 Trojan 99 and the BTP channel, all containing very
 5 relevant information, did that make it more likely that
 6 relevant information would not reach the officers?
 7 A. I think, as I commented earlier, there was
 8 an exceptional amount of radio traffic, and having
 9 multiple channels can improve the segregation of that
 10 information, that having one channel or a more -- or
 11 a lesser number of channels could actually clog the
 12 system up even more.
 13 Q. What is the need for the separation of forces such that
 14 we have a separate police force for the City of London
 15 area and a separate police force for the Greater London
 16 area?
 17 A. Well, I'd say a long matter of history for the existence
 18 of more than one police force, and that situation
 19 continues today.
 20 Q. Yes, so we know it continues today, but is there
 21 a positive advantage in having a separate police force
 22 for the area covered by the City of London Police?
 23 A. I may be slightly biased in my answer, but I would feel
 24 that the City of London Police deliver an exceptional
 25 service on behalf of those we police within our

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1 community, so I believe the City of London Police should
 2 exist in its independent state.
 3 Q. My question was, is there a positive advantage in having
 4 a separate force?
 5 A. I believe we are responsive to the community we police,
 6 which is by its nature different to those demographics
 7 that we police around us, and I think that is a
 8 positive.
 9 Q. Is there the potential for duplication of resources?
 10 A. No. I do not -- I think that the -- as I referred to
 11 earlier, the way we work with our colleagues both in the
 12 Metropolitan Police and, indeed, the
 13 British Transport Police, works very well.
 14 Q. Is there the potential for things to get missed, where
 15 you have an ARV officer who wants to know all the
 16 relevant information but he's juggling various channels
 17 with three different police forces?
 18 A. As I said, I think the segregation of radio channels
 19 brings operational advantage.
 20 Q. You told the court that learning lessons was very
 21 important to the City of London force?
 22 A. Yes.
 23 Q. Why, then, was there no debriefing for this officer at
 24 the centre of this whole matter, Police Constable
 25 Duggan?

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1 A. I actually believe that that's incorrect and I know that
 2 PC Duggan was subject to a debrief.
 3 Q. Ah. Yes. He told the court when he gave evidence that
 4 there was none.
 5 A. I'm sure you will appreciate the position from this box
 6 when being faced with questions.
 7 MS BARTON: Sir, can I indicate as a matter of fact he does
 8 appear in the debrief documentation but I know that it
 9 was only put on Opus last night so Mr Patterson may not
 10 have seen it. There is a specific debrief for the
 11 second car.
 12 MR PATTERSON: I'm grateful. Right.
 13 Just so you're aware, Commander, I'm looking at the
 14 transcript, {Day4/128:1-25}:
 15 "Question: After this was all over, did you at any
 16 stage have to attend for any debriefing or anything of
 17 that sort in which you were asked to give any account or
 18 details or discussed things that had gone well and
 19 things that hadn't gone well on the night?
 20 "Answer: No."
 21 So that's incorrect?
 22 A. That is incorrect.
 23 Q. And he was. And so can you help us: what did he say
 24 about how it went on the night?
 25 A. The debrief is not a reflection upon the --

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1 a deconstruction of the tactical response. The purpose
 2 of the debrief is to reflect upon the incident and see
 3 what can happen and be improved.
 4 Q. Yes, and so was this topic discussed?
 5 A. Which specific topic?
 6 Q. The one I've just been asking you about: that he missed
 7 all of these references on these different channels to
 8 it being a terrorist incident and to proceed and so
 9 forth?
 10 A. I don't believe it was discussed in that framework, no.
 11 Q. And so has the force reflected on this issue?
 12 A. Again, the multiple channels being monitored by firearms
 13 officers; is that the specific item?
 14 Q. The issue that I asked PC Duggan about and the issue
 15 I've been asking you about: how it came about that this
 16 ARV was unaware of the need to proceed in the way that
 17 the messages suggested?
 18 A. The message to which PC Duggan responded was, I believe,
 19 that he believed he was responding to a road traffic
 20 collision. He responded to that and delivered critical
 21 first aid on the bridge.
 22 Q. So if similar circumstances recurred tomorrow, might
 23 similar difficulties arise such as an officer in his
 24 position might not get the relevant information?
 25 A. I think the circumstances you describe are purely

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1 hypothetical and therefore I can't answer that.
 2 Q. Well, it happened on that night --
 3 A. But you've asked me to reflect into the future and
 4 I obviously can't answer that.
 5 Q. So what led to the entries that we were taken to on the
 6 debriefing document that was disclosed yesterday?
 7 A. The debrief process itself?
 8 Q. Yes. So what led to those reflections on radio channel
 9 issues?
 10 A. The business of the control room and the necessity for
 11 wider officers to be aware of the declaration of a major
 12 incident. That a movement of the P London Event 8
 13 channel as referred to in the debrief is not specific to
 14 armed response vehicles; it's for the wider response.
 15 Q. So has there been no reflecting at all on what went well
 16 or what went badly with Trojan City 2?
 17 A. No, I think that's a misrepresentation because, as I've
 18 said, we have also placed the Trojan 99 channel into our
 19 force control room, so where our officers are responding
 20 to something which may be a cross-border incident, we
 21 would have a real time parallel monitoring within the
 22 force control room.
 23 Q. And why has that change been brought about?
 24 A. Because of our reflection and improvement to our
 25 services.

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1 Q. Including what happened with Trojan City 2?
 2 A. Including my own awareness of the involvement of our
 3 specific officers once they had deployed in the
 4 Borough Market area.
 5 Q. And does that include what happened with Trojan City 2?
 6 A. No, specifically, as I've just answered, that is in
 7 reflection of my personal awareness of the specific
 8 involvement of our officers.
 9 Q. Does training address -- you mentioned in that
 10 debriefing document training; have there been changes to
 11 training as a result of what happened on the night?
 12 A. In respect of? Your question is quite general in
 13 respect of --
 14 Q. ARVs?
 15 A. ARVs are probably subject to the most intensive training
 16 regime of any specialist police officer.
 17 Q. Does training address when to prioritise armed response
 18 actions and when to divert into triaging?
 19 A. Well, that's going to be based upon the information
 20 available to that officer dynamically at that point.
 21 MR PATTERSON: Thank you, officer, I have no more questions.
 22 A. Thank you.
 23 Questions by MS BARTON QC
 24 MS BARTON: May I just deal with a couple --
 25 THE CHIEF CORONER: Just before you do, I was going to,

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1 because it's 11.40, I was going to say we would take our
 2 break but if you have literally just a few questions
 3 we'll take a break afterwards.
 4 MS BARTON: I will be less than five minutes.
 5 THE CHIEF CORONER: Carry on.
 6 MS BARTON: Just picking up on that last issue about the
 7 training of ARV officers. It is a very high level of
 8 training, isn't it?
 9 A. Their initial selection and training is extremely
 10 intensive. They are also subject to the most stringent
 11 continual professional development and requalification
 12 in their skills, so yes.
 13 Q. But, as you've indicated, their actions at any given
 14 time are entirely dependent on the knowledge and
 15 information which is available to them?
 16 A. I think that goes for any police officer: they can only
 17 deal with what information they have and as it presents
 18 itself to them.
 19 Q. And, assuming as we must, that PC Duggan only heard that
 20 there was a road traffic accident rather than
 21 a terrorist incident, do you have any criticism of the
 22 actions of PC Duggan and his colleague on that night?
 23 A. I have absolutely none. As I said at the start,
 24 I'm exceptionally proud of the way that these officers
 25 in particular responded. They acted entirely in line

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1 with their training and in the expectations that I would
 2 have of them as a senior police officer in their
 3 capacity as a police officer alone they stopped and they
 4 tried to preserve and protect life.
 5 Q. Which is a primary role of a police officer?
 6 A. Absolutely.
 7 Q. And another topic if I may, very briefly. You were
 8 asked to consider the alleged suspicious movement of the
 9 van --
 10 A. Yes.
 11 Q. -- in the City of London. You have reviewed the CCTV;
 12 is that correct?
 13 A. Yes.
 14 Q. That CCTV is a spliced-together compilation of both
 15 private and City of London CCTV, isn't it?
 16 A. It is.
 17 Q. So it is not a view you would have had on the night?
 18 A. No.
 19 Q. Even with that view, do you regard the movements of the
 20 van as suspicious?
 21 A. I don't. I can't reiterate enough just how many similar
 22 movements of similar vehicles we would see within the
 23 City area. The number of deliveries within the force
 24 area at any given time across the 24-hour clock is just
 25 immense, and increasing.

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1 Q. And you mentioned a particular exercise that had been
 2 done to see if you could use CCTV more effectively to
 3 pick up vehicles which had gone more than once up and
 4 down a street, so that was a particular exercise City
 5 Police did, was it?
 6 A. Yes, we used the technology available to us to assess
 7 those vehicles that had moved within a similar footprint
 8 within a very short period of time. I think as many
 9 people, Londoners, will appreciate, with taxis and buses
 10 going up and down the same route, we see vehicles going
 11 up and down the same roads quite commonly quite close
 12 together.
 13 Q. So was that an exercise that, having been conducted,
 14 even looking at only private vehicles, was not going to
 15 be an exercise that you could conduct on a daily basis
 16 as part of routine policing?
 17 A. Absolutely not. The false positives that it would have
 18 thrown up would have been disproportionate to the
 19 function we were trying to achieve.
 20 MS BARTON: Thank you very much.
 21 Further questions by MR HOUGH QC
 22 MR HOUGH: A few questions about PC Duggan, please,
 23 Commander Evans. Is this right by way of chronology, as
 24 far as you understand it: all the fatal injuries in this
 25 attack had been inflicted by 22.09.26?

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1 A. That is my understanding, yes.
 2 Q. PC Duggan arrived at the north end of the bridge at
 3 22.11.29 in the report that you have been shown?
 4 A. Yes.
 5 Q. So he arrived on scene after -- actually he arrived at
 6 the other end of the bridge after all the fatal injuries
 7 had been inflicted?
 8 A. Yes, therefore making it impossible for him to have
 9 prevented them.
 10 Q. When PC Duggan did arrive, according to this report, he
 11 got to Christine Archibald at about 22.13?
 12 A. Yes.
 13 Q. And remained with her rendering care until about 22.20.
 14 A. Yes.
 15 Q. He then left and headed towards the attack site, the
 16 knife attack site at 22.21, or thereabouts?
 17 A. That's my understanding, yes.
 18 Q. At that time, 22.21, as far as you knew, and as far as
 19 he would have known, an attack may still have been in
 20 progress?
 21 A. Indeed.
 22 Q. So as far as he knew, at 22.21, he was running into
 23 harm's way?
 24 A. He was. He was displaying the utmost bravery in doing
 25 so.

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1 Q. You were asked about a radio transcript , {DC7287/52}.
2 Can we look at that just briefly . You were asked about
3 Trojan City 2 making communications over this radio
4 channel. Can we see that his communications were made
5 very shortly before a reference from 99 to Plato having
6 been declared?
7 A. Yes.
8 Q. We know that Plato was declared at 22.16?
9 A. Yes.
10 Q. Therefore, whenever Trojan City 2 was making those
11 communications on that radio it was shortly before 22.16
12 at the very earliest ?
13 A. It can only have been.
14 Q. Which would have been at a time when the attackers were
15 pretty much being confronted by Trojan City 1?
16 A. Yes.
17 MR HOUGH: Thank you very much. Those are all my questions.
18 THE CHIEF CORONER: Thank you very much indeed, Commander.
19 Mr Hough, we will take our break there and then we
20 will sit again in 15 minutes.
21 (11.44 am)
22 (A short break)
23 (12.02 pm)
24 THE CHIEF CORONER: Yes.
25 MR HOUGH: Sir, as you see, the next witness is Detective

1 Superintendent Riggs.
2 Detective Superintendent, you are already on oath,
3 you appreciate?
4 DETECTIVE SUPERINTENDENT REBECCA RIGGS (recalled)
5 Questions by MR HOUGH QC
6 A. Yes.
7 Q. You have already told us that you are the senior
8 investigating officer of Operation Dativall, the
9 investigation into the attack?
10 A. Yes.
11 Q. At the start of the hearing you gave evidence to provide
12 an overview of the attack itself ; are you now giving
13 evidence to explain in more detail the SO15
14 investigation carried out after the attack?
15 A. Yes, sir, that's correct.
16 Q. You're addressing a report at {DC7183/1} to which you
17 may refer as you wish.
18 A. Thank you.
19 Q. And to which I shall refer .
20 You will be giving evidence again at the end of the
21 hearing to deal with remaining issues and to verify the
22 personal details of those who died for the purposes of
23 death registration formalities --
24 A. Yes, that's correct.
25 Q. You appreciate that?

1 May I begin with the response of SO15 to the attack
2 which you address from page 3 of your report. We've
3 heard that SO15 was informed of the attack quickly as
4 part of the set of actions triggered by Operation Plato?
5 A. Yes, that's correct.
6 Q. We've heard also that DC Frisby attended Stoney Street
7 and examined the attackers immediately after the
8 explosives officers had cleared them; is that right?
9 A. That's correct.
10 Q. Did the investigation proceed quickly during that night?
11 A. Yes, it was.
12 Q. Were the identities and home addresses of the attackers
13 quickly established?
14 A. Yes, they were.
15 Q. What was the initial main objective of the SO15
16 response?
17 A. The main objective was to preserve life and protect the
18 public and to establish whether or not there was a wider
19 network.
20 Q. In establishing that, were associates of the attackers
21 identified and some arrested?
22 A. Yes, that's correct.
23 Q. Given that at that stage the extent of any network was
24 unknown, what was done to identify and arrest potential
25 associates?

1 A. So there was a decision made that any occupants of the
2 addresses of the known attackers would be arrested
3 whilst they were at the address.
4 Q. Were those people who were arrested interviewed over the
5 following days?
6 A. Yes, they were.
7 Q. Were they then kept in custody for varying periods of
8 time?
9 A. That's correct.
10 Q. In simple terms, what were the factors determining how
11 long individuals were kept in custody?
12 A. So in simple terms some of that would have been in
13 relation to what evidence was established, some of that
14 was intelligence -led, and obviously based on what
15 individuals would respond to in relation to the
16 questioning.
17 Q. So factors like length of questioning and how long it
18 took to make follow-up inquiries?
19 A. Yes.
20 Q. In the period immediately after the attack was there
21 also an effort to secure witnesses immediately,
22 eyewitnesses to the attack immediately?
23 A. Yes, there was.
24 Q. And for that purpose was a tiering system, as is usual,
25 set up in order to prioritise witnesses?

1 A. Yes, that's correct.
 2 Q. Over the page to your page 4, was CCTV from public and
 3 private sources seized from a very early stage?
 4 A. Yes, that's correct.
 5 Q. Is this right: speed being essential to ensure that
 6 nothing is lost and also nothing deliberately deleted?
 7 A. Yes, that's right.
 8 Q. Was the initial effort to obtain CCTV covering the route
 9 taken by the attackers and their movements before the
 10 attack?
 11 A. That's right, yes.
 12 Q. We've heard in detail about what could and couldn't be
 13 found ultimately, but was this an effort which took
 14 a considerable amount of time, despite all the energies
 15 devoted to it?
 16 A. Yes, it did.
 17 Q. Meanwhile, were surveyors from the Computer-Aided
 18 Modelling Bureau deployed to the scene?
 19 A. Yes, they were.
 20 Q. And has their laser-scanning work produced the overview
 21 images and animations you showed us on the last
 22 occasion?
 23 A. Yes, that's right.
 24 Q. Were appeals made for photographs and footage from the
 25 public?

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1 A. Yes, there were.
 2 Q. Again, was that a time-sensitive process because of the
 3 need to ensure that nobody got rid of their material?
 4 A. Yes, that's right.
 5 Q. And was body-worn footage obtained from officers who had
 6 it so that that could be viewed?
 7 A. Yes, I think we managed to gather about 470 clips of
 8 body-worn footage.
 9 Q. As we have heard, that's been very useful in
 10 understanding both the response to the attack and
 11 emergency care?
 12 A. Yes, that's right.
 13 Q. May I now move on to arrests and searches. How many
 14 people in total were arrested in relation to the attack?
 15 A. There were 22 arrests.
 16 Q. Of those, how many were family members of the attackers?
 17 A. 12.
 18 Q. Under what provision were the family members arrested?
 19 A. They were arrested under section 41 of the Terrorism Act
 20 2000.
 21 Q. That, I think, is a section which permits a constable to
 22 arrest without warrant a person reasonably suspected to
 23 be a terrorist?
 24 A. That's correct, yes.
 25 Q. In this case was the suspicion which founded the arrests

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1 of the family members based purely on the fact of their
 2 family connection?
 3 A. That's correct.
 4 Q. The other ten, other than family members who were
 5 arrested over the days that followed, were they
 6 associates of the attackers?
 7 A. Nine of them were; one of them was not.
 8 Q. Were they arrested for a variety of offences?
 9 A. Yes, that's correct.
 10 Q. Were all the 22 arrested ultimately released without
 11 charge after the various periods?
 12 A. Yes, they were.
 13 Q. May I now address some of the significant individuals
 14 arrested.
 15 First of all, Charisse O'Leary. She told us that
 16 she was arrested early on the day after the attack; is
 17 that right?
 18 A. Yes, that's right.
 19 Q. She gave us an account denying any knowledge of the
 20 attack or preparations for it. Did she give a similar
 21 account to police?
 22 A. Yes, she did.
 23 Q. Were her media devices examined?
 24 A. Yes, they were.
 25 Q. Was anything significant found?

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1 A. Nothing significant was found.
 2 Q. Zahrah Rehman next, please. Was she also arrested on
 3 the day after the attack?
 4 A. Yes, she was.
 5 Q. Did she answer initial questions of police officers?
 6 A. Yes, she did.
 7 Q. And did she provide further accounts and substantial
 8 accounts later?
 9 A. Yes, she did.
 10 Q. She has denied to us any knowledge of the attack or
 11 preparations for it. Did she similarly give such
 12 denials to police?
 13 A. Yes, that's correct.
 14 Q. Her devices or devices partly or entirely attributed to
 15 her have already been discussed by DS Ager, so I won't
 16 ask you about those.
 17 May we go through the other family members of
 18 Khuram Butt and Zahrah Rehman who were arrested, and can
 19 you confirm in each case that they were arrested, that
 20 they denied knowledge of the attack, and for the most
 21 part, that they condemned the attack?
 22 A. Yes.
 23 Q. First of all, Khuram Butt's mother.
 24 A. Yes, that's right, so Fahmida Akhtar, she denied any
 25 knowledge of the attack.

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1 Q. Paragraph 3.9, Khuram Butt's uncle, Akhter Hussain?
 2 A. That's correct.
 3 Q. 3.12, Khuram Butt's sister-in-law, Saad Butt's wife,
 4 Noor?
 5 A. Correct.
 6 Q. 3.13, Khuram Butt's maternal aunt, Tahira Hussain?
 7 A. That's right.
 8 Q. 3.5 and 3.8, Zahrah Rehman's brothers, Hashim and Qasim
 9 Rehman?
 10 A. Correct.
 11 Q. 3.7, Zahrah Rehman's father, Abdul Rehman-Butt.
 12 A. Correct.
 13 Q. 3.6, Zahrah Rehman's uncle, Kurrain Zaheer?
 14 A. Correct.
 15 Q. 3.10, Zahrah Rehman's sister, Murriam?
 16 A. Correct.
 17 Q. And 3.11, Zahrah Rehman's mother, Yasmin?
 18 A. Yes, that's right.
 19 Q. You obtained accounts from those you arrested and were
 20 those accounts then fed into the report which Mr Jolley
 21 has given evidence about?
 22 A. Yes, that's right.
 23 Q. May I ask next about associates arrested who weren't
 24 family members from your page 8. We heard about
 25 Habibur Murad, a neighbour of Khuram Butt who plays

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1 a part in the narrative; was he arrested?
 2 A. Yes, he was, he was arrested under section 5 of the
 3 Terrorism Act.
 4 Q. What was the background to his being arrested?
 5 A. So Murad actually approached officers whilst they were
 6 at the address and informed them that he provided some
 7 funds to Butt, the £160 for the hire of the van.
 8 Q. Made an electronic money transfer?
 9 A. That's correct.
 10 Q. Was he then arrested on suspicion of preparation of
 11 terrorist acts because of that information he had
 12 himself given?
 13 A. Yes, that's right.
 14 Q. In a sentence or two, what was the explanation he gave
 15 in interview?
 16 A. He gave a full and thorough explanation. The
 17 explanation being, as has been provided by L around what
 18 is now described as a cover story, that he believed that
 19 the monies were being used to move brothers.
 20 Q. Did he tell your officer specifically that Khuram Butt
 21 had approached him and asked if he had a van because
 22 Khuram Butt needed to move a brother?
 23 A. That's right.
 24 Q. Did he say that he'd given Khuram Butt advice to contact
 25 the company Enterprise?

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1 A. That's correct.
 2 Q. Did he tell you that Khuram Butt had then asked him to
 3 transfer £160 if he gave the same sum in cash because he
 4 didn't have enough money in his account to hire the van?
 5 A. That's correct.
 6 Q. And did that explanation, from all your inquiries, check
 7 out?
 8 A. Yes, it did.
 9 Q. Next, 3.15, Shahid Iqbal, was Shahid Iqbal
 10 a long-standing associate of Khuram Butt who had been in
 11 recent telephone contact with him?
 12 A. Yes, that's correct.
 13 Q. Did Iqbal give your officers an account of Khuram Butt
 14 becoming stricter in his religious views over recent
 15 times?
 16 A. Yes, he did.
 17 Q. Looking at page 9 of your report, when did Iqbal say
 18 he'd last seen Khuram Butt?
 19 A. So he says that he last saw him on 2 June at Friday
 20 prayers at the Ummah Fitness Centre.
 21 Q. Did you identify telephone contact between the two,
 22 including text messages?
 23 A. Yes, that's correct.
 24 Q. When did they end?
 25 A. So they concluded at 02.44 hours on 3 June.

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1 Q. Was Iqbal asked about knowing Redouane or Zaghba,
 2 whether he knew them?
 3 A. Yes, he was, and he denied any knowledge of them.
 4 Q. Was there, however, one piece of information he needed
 5 to explain in that regard?
 6 A. So we had evidence that he had telephone contact with
 7 Zaghba's phone, which he explained was possibly as
 8 a result of Butt may have made a call from that
 9 particular phone.
 10 Q. A possibility you couldn't discount or reject?
 11 A. That's right.
 12 Q. Were a number of other associates of the attackers
 13 arrested, including a number of people who apparently
 14 knew them from the Ummah Fitness Centre and from local
 15 mosques?
 16 A. That's right, yes.
 17 Q. Did most of those give accounts of knowing the
 18 attackers, or some of the attackers, and did they all
 19 deny knowledge of the attack?
 20 A. Yes, they did.
 21 Q. Were their accounts checked, so far as it was possible
 22 to check them out?
 23 A. Yes, they were.
 24 Q. Can I deal with a few examples? 3.21, Badram Doci, was
 25 he an associate of Khuram Butt who admitted to knowing

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1 Redouane by sight?
 2 A. Yes, that's right.
 3 Q. Did he give an account of Butt having attempted to sell
 4 him a Galaxy smartphone?
 5 A. Yes, he did.
 6 Q. Klevis Kola, was Mr Kola an associate of all three
 7 attackers who gave an account of having been on the trip
 8 to Leeds on 18 April with Butt and Redouane?
 9 A. Yes, he did.
 10 Q. And also an account of being on the trip to Southend
 11 with Redouane and Zaghba on 26 May 2017?
 12 A. Yes, that's right.
 13 Q. Regarding the trip to Leeds, did he give an account of
 14 having met two brothers whom we know to be the
 15 Abdoullahi brothers?
 16 A. Yes, that's right.
 17 Q. Did he explain that trip in summary as being to buy
 18 a car and a social visit?
 19 A. Yes, he did.
 20 Q. I think we heard in the last couple of days Witness L
 21 confirm that was MI5's understanding of the visit and
 22 describe Mr Kola as somebody not linked to extremism?
 23 A. That's right.
 24 Q. At 3.23, please, Irfan Saeed, on what based was Mr Saeed
 25 arrested?

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1 A. So he was arrested on 9 June under section 2 of the
 2 Terrorism Act 2006, which was on suspicion of
 3 dissemination of terrorist publications.
 4 Q. Was that relating to this specific investigation or
 5 another investigation?
 6 A. It was relating to another investigation.
 7 Q. May I deal with some facts established in relation to
 8 Mr Saeed. Did you establish that he was the last person
 9 contacted by Khuram Butt before the attack?
 10 A. Yes, that's right.
 11 Q. When was that?
 12 A. 17.10 hours on 3 June.
 13 Q. After that, had Saeed made some unsuccessful attempts to
 14 contact Khuram Butt?
 15 A. Yes, he did.
 16 Q. If we look at the timeline, {DC8207/27}, please. If we
 17 can zoom in on lines 1014 to 1024, we can see two
 18 communications from Khuram Butt to Irfan Saeed at 17.07
 19 and 17.10, and then seven or eight, I think seven
 20 communications from Irfan Saeed to Khuram Butt, the last
 21 one being an SOS message at 21.12?
 22 A. That's right.
 23 Q. Was Saeed also a member of the ILM and ILMA chat groups?
 24 A. Yes, he was.
 25 Q. And had he posted any messages of particular interest on

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1 those groups?
 2 A. So most of the messages on that were in relation to
 3 religious issues, but the actual group closed on 4 June.
 4 Q. Had he posted some messages about online security?
 5 A. Yes, he had.
 6 Q. On 6 June did you discover that he had sent a message of
 7 significance to the administrator of the chat group?
 8 A. Yes, that's right, so he sent a message to Mohammed Ali
 9 who was the group administrator and in that message it
 10 said:
 11 "Erase everything from your phone anything you have
 12 get rid of it they are raiding homes in the Newham
 13 area."
 14 Q. Was Saeed's own phone examined?
 15 A. Yes, it was.
 16 Q. Were any messages of relevance found on it?
 17 A. There were no messages found prior to 5 June 2017.
 18 Q. Would that suggest that he had followed his own advice
 19 and erased messages up to that point?
 20 A. Yes, we believe so.
 21 Q. Was it possible to identify precisely what had been
 22 texted between him and Khuram Butt in those texts we
 23 looked at on the timeline?
 24 A. No, it was not.
 25 Q. Was some evidence discovered linking Saeed to extremist

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1 material?
 2 A. Yes, that's correct.
 3 Q. Was a file sent to the CPS for charging advice in
 4 relation to section 38(b) of the Terrorism Act 2000
 5 concerning Mr Saeed?
 6 A. Yes, it was.
 7 Q. Is that the offence of failing to pass on to authorities
 8 information of assistance in preventing an act of
 9 terrorism or apprehending a person in relation to
 10 terrorism?
 11 A. That's correct.
 12 Q. What was the basis, in a sentence or two, for that
 13 offence in relation to Mr Saeed?
 14 A. In essence it was in relation to the evidence we'd found
 15 around the suggestion of the deletion of the messages
 16 and also with regards to his contact and numerous
 17 efforts to try and get hold of Butt during, prior and
 18 post-attack.
 19 Q. So a combination of him having erased messages on his
 20 phone, apparently, and his attempts to contact Butt on
 21 the evening of the attack gave you suspicion that he may
 22 have known something was going on?
 23 A. That's correct.
 24 Q. However, was there anything more to suggest in a direct
 25 way that he knew that Khuram Butt was planning an attack

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1 of any kind?
 2 A. No, there was not.
 3 Q. Was there anything more than those facts that you have
 4 set out to me as a basis for submitting the file to the
 5 CPS?
 6 A. There was nothing more.
 7 Q. And did the CPS find that there was insufficient
 8 evidence to charge Saeed with that offence?
 9 A. That's correct.
 10 Q. Did you consider a number of potential offences in
 11 relation to those you had arrested?
 12 A. Yes, that's correct.
 13 Q. Looking at 3.24 of your report, can you summarise what
 14 those offences were which you considered when deciding
 15 whether to charge anyone?
 16 A. So as we've just discussed there was section 38(b) of
 17 the Terrorism Act 2000 which is about somebody that
 18 knows or believes they have material of assistance in
 19 preventing the commission of another person of an act of
 20 terrorism, or preventing us securing the apprehension or
 21 prosecution or conviction of another.
 22 Other offences were section 15 of the Terrorism Act
 23 which, in essence, a person commits an offence if they
 24 invite another to provide money or other property, and
 25 intends it should be used or reasonable cause to suspect

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1 that it may be used for the purposes of terrorism.
 2 Section 1 of the Terrorism Act 2006 was
 3 a consideration which is the encouragement of terrorism.
 4 Section 5 of the Terrorism Act 2006 makes the
 5 preparation of terrorist acts an offence. This was also
 6 a consideration for us.
 7 Q. With the exception of the file submitted in relation to
 8 Mr Saeed, were any other files submitted for any other
 9 persons for prosecution in relation to terrorist
 10 offences?
 11 A. No, they were not.
 12 Q. Despite all your investigations was there any evidence
 13 that you found that anyone knowingly assisting or
 14 encouraged the attack?
 15 A. No, there was not.
 16 Q. Was there very little evidence, even suggesting that
 17 anyone other than the attackers was aware of attack
 18 planning?
 19 A. That's correct, yes.
 20 Q. So such evidence that there was in the case of Mr Saeed,
 21 as we've seen, circumstantial and not all pointing one
 22 way?
 23 A. That's correct.
 24 Q. Searches next, please. Did you search, or did your
 25 officers search, a number of residential addresses after

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1 the attack?
 2 A. Yes, that's correct, we searched 22 addresses.
 3 Q. Did those include all the recent addresses for the
 4 attackers?
 5 A. Yes, it did.
 6 Q. Did they also include the Ummah Fitness Centre?
 7 A. Yes, it did.
 8 Q. Were searches also carried out in the attack area in
 9 order to recover evidence from there?
 10 A. Yes, it was.
 11 Q. May I now move on to some other persons and places of
 12 interest. First of all, the brothers Gharib and Sirwan
 13 Abdoullahi. Were they arrested in relation to
 14 a separate investigation?
 15 A. Yes, they were.
 16 Q. Were they interviewed and released without charge?
 17 A. Yes, they were.
 18 Q. Usman Darr, from whom we've heard, did he provide
 19 a statement through his solicitor?
 20 A. Yes, he did.
 21 Q. What was his occupation at the time of the attack?
 22 A. So Darr was working for BAA. He was at Heathrow
 23 Airport.
 24 Q. What happened to that employment after the attack?
 25 A. So his employment itself as a security officer, that was

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1 terminated.
 2 Q. Was that as a result of his connection to Khuram Butt?
 3 A. I'm not able to say because I don't know, sir, not
 4 because of any reasons of security.
 5 Q. Did you also receive some evidence about Usman Darr?
 6 A. Yes, that's correct.
 7 Q. Did you receive a statement from a colleague of his
 8 suggesting that he had become more religious in recent
 9 years?
 10 A. Yes, that's correct.
 11 Q. And that he had been heard making a comment hostile to
 12 Jewish people?
 13 A. Yes, that's right.
 14 Q. Next, please, paragraph 4.4, Jamel Kasimi. We've heard
 15 that he was an associate of Khuram Butt and
 16 Rachid Redouane, a French person who was a teacher who
 17 lived in London up to March 2017; is that right?
 18 A. That's right.
 19 Q. Did you discover in your investigations that he had been
 20 subject to a port stop, as we've heard, on 9 April 2017?
 21 A. Yes, that's right.
 22 Q. We have heard from Mr Jolley his accounts of Redouane
 23 and Butt. Those were provided to your officers?
 24 A. Yes, that's correct.
 25 Q. And we've also heard from DS Ager about messages he

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1 exchanged with Butt and Redouane up to March 2017?
 2 A. That's correct.
 3 Q. May I next, then, ask you about the Ad-Deen school which
 4 you address at paragraph 4.6. Was that also
 5 investigated?
 6 A. Yes, it was.
 7 Q. After the attack did Sophie Rahman, the headteacher,
 8 make a self referral to the local authority because of
 9 concerns about Butt having worked there?
 10 A. Yes, she did.
 11 Q. Did you establish in your investigations that her
 12 partner, Mr Shahid, was a former proprietor of the
 13 school?
 14 A. Yes, that's right.
 15 Q. Did the Department for Education close down the school
 16 in August 2017?
 17 A. Yes, they did.
 18 Q. Did you discover in the course of your investigations,
 19 as we've heard, that Sophie Rahman was subject to
 20 a prohibition order by a professional conduct panel
 21 after that?
 22 A. Yes, she was.
 23 Q. The Ummah Fitness Centre, you've told us that that was
 24 searched. What did you find in evidence at that address
 25 identifying those running it and working there?

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1 A. So there was a notice on the wall at the gym that gave
 2 contact phone numbers of the management.
 3 Q. And to whom was the contact phone number of particular
 4 interest linked?
 5 A. That was linked to Sophie Rahman.
 6 Q. Were any employees identified during the search?
 7 A. Yes, there was an employee identified which was
 8 Ibrahim Sajeel.
 9 Q. Was that Sophie Rahman's son?
 10 A. That's correct.
 11 Q. May we now turn to forensic investigations. How many
 12 crime scenes in total were processed in the course of
 13 this investigation?
 14 A. There were 124.
 15 Q. Was the scene of the attack one, or did it comprise
 16 a number of those crime scenes?
 17 A. That comprised a number of scenes.
 18 Q. What sort of areas or addresses were other crime scenes?
 19 A. So you've got Borough Market, Stoney Street, they were
 20 scenes, the attackers' home addresses were individual
 21 scenes, the area of London Bridge itself was treated as
 22 a scene, and then obviously primarily the deceased and
 23 the attackers' bodies are treated as scenes as well.
 24 Q. Were post mortem examinations of the attackers carried
 25 out as well as post mortem examinations of the victims?

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1 A. Yes, that's correct.
 2 Q. I don't mean to go into those in any detail, because
 3 they will be addressed in the inquests of the attackers,
 4 but in each case did the pathologist determine that
 5 death was due to multiple gunshot wounds?
 6 A. Yes, that's right.
 7 Q. Paragraph 5.8, please, on page 18, how many exhibits in
 8 total were seized from the crime scenes, including
 9 physical exhibits, to assist you in your investigation?
 10 A. There was almost 6,100 exhibits.
 11 Q. Let me ask you about some of those exhibits. We've
 12 heard about analysis of samples taken from the attackers
 13 and conclusions about steroid use.
 14 A. That's right.
 15 Q. May I ask you about ballistics: was a detailed
 16 investigation carried out by a ballistics expert called
 17 Fiona Ritchie?
 18 A. Yes, that's right.
 19 Q. How many officers did she conclude had discharged their
 20 firearms?
 21 A. There was a total of eight firearms officers.
 22 Q. And how many cartridges discharged?
 23 A. There were 46.
 24 Q. Of the officers who discharged firearms, were three the
 25 officers from the City of London Police in the first ARV

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1 to attend Stoney Street?
 2 A. Yes, that's correct.
 3 Q. And were a further five MPS officers,
 4 Metropolitan Police officers, who arrived very shortly
 5 afterwards?
 6 A. That's correct.
 7 Q. We've heard that the first shots were fired at 22.16.50
 8 when the attackers ran at the City of London Police
 9 officers.
 10 A. That's right.
 11 Q. Looking at your page 19, can you tell us when the next
 12 sets of shots were fired and by whom?
 13 A. The secondary engagements with Redouane were at 22.23.23
 14 and Butt 22.23.56.
 15 Q. Which officers fired at Redouane in that engagement at
 16 22.23.23?
 17 A. BY28 and E59.
 18 Q. Which officers fired at Butt in the engagement
 19 immediately afterwards, about half a minute afterwards,
 20 on him?
 21 A. BY5, BX44, AY14, and E122.
 22 Q. Were shots further fired at Butt shortly before 10.30 by
 23 one officer?
 24 A. Yes, that's right, BX44.
 25 Q. I think he fired further shots at 22.28.52 and 22.29.53.

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1 A. That's right.
 2 Q. When was the final shot fired on any of the attackers?
 3 A. It's at 22.31.45.
 4 Q. Who fired that?
 5 A. That was BX46.
 6 Q. Which attacker was that fired towards?
 7 A. That was fired at Butt.
 8 Q. Was that during the evacuation of the Wheatsheaf pub of
 9 which you have told us?
 10 A. Yes, that's correct.
 11 Q. Were the firearms themselves examined and found to be
 12 operating normally?
 13 A. Yes, that's right.
 14 Q. Did the ballistics expert find and analyse multiple
 15 instances of damage to buildings?
 16 A. Yes, that's right.
 17 Q. Looking at paragraph 5.13, by how many bullets had the
 18 various attackers been struck, so far as the expert
 19 could identify?
 20 A. So far as Ms Ritchie could identify, she states that
 21 Butt and Redouane had been struck by at least six
 22 bullets.
 23 Q. Six bullets each?
 24 A. That's correct.
 25 Q. Was it possible for her to be any more precise than

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1 that?
 2 A. She explains in her statement no, on the basis of the
 3 complexity of the injuries caused.
 4 Q. We will hear from her in the inquests of the attackers.
 5 Zaghba, how many bullets had he been struck by?
 6 A. She says at least two.
 7 Q. Were there any particular signs on him suggesting
 8 distance of firing?
 9 A. Yes, she does state in her evidence that he has visible
 10 close-range discharge, the effects of which are on his
 11 right hand, indicating that he was within 60 cm of the
 12 muzzle at the time the gun was fired.
 13 Q. Paragraph 5.14, please. Were the knives examined by
 14 an engineer for the Metropolitan Police's Physical
 15 Protection Group?
 16 A. Yes, that's correct.
 17 Q. What were his principal findings?
 18 A. His principal findings in relation to the knives is that
 19 in each case the tips were missing, and then he carried
 20 out tests to explain why that may have been, and
 21 Mr Fenne's opinion was that a stab into wood or bone in
 22 which knives became jammed and withdrawn very quickly at
 23 an angle, which may result in the tips being broken.
 24 Q. Did he make any surmise as to what that might suggest?
 25 A. He suggests that the damage to all three blades in the

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1 same manner may indicate that the attackers had
 2 an agreed stabbing method.
 3 Q. Was that, though, a conclusion which was recognised to
 4 be somewhat speculative?
 5 A. Yes.
 6 Q. Were the knives assessed according to sharpness by using
 7 new models which hadn't suffered damage in an attack?
 8 A. Yes, they were.
 9 Q. What was found about the degree of sharpness of, first
 10 of all, the points and, secondly, the edges of those new
 11 models of the knives?
 12 A. Fenne classified the knives as having a sharp point and
 13 a very sharp edge.
 14 Q. And that's in accordance with a rough scale of
 15 sharpness?
 16 A. That's correct.
 17 Q. Forensic work was also done by Dr Marsh at the
 18 instruction of the police, as we've heard?
 19 A. Correct.
 20 Q. And collision investigation work by PC Andrews, from
 21 whom we've heard?
 22 A. Yes, that's correct.
 23 Q. Looking at your page 21, paragraph 5.9, were DNA swabs
 24 taken from the --
 25 THE CHIEF CORONER: Paragraph 5.19.

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1 MR HOUGH: I'm sorry?
 2 THE CHIEF CORONER: Paragraph 5.19.
 3 MR HOUGH: I'm sorry, yes, 5.19. Were DNA swabs taken from
 4 the Hertz van?
 5 A. Yes, they were.
 6 Q. What were the conclusions of the swabs and the analysis
 7 of the DNA?
 8 A. So the analysis of the DNA was that -- it states that
 9 the likelihood of Xavier Thomas as one of those
 10 individuals is 9,500 times more likely him than not.
 11 Q. That, I think, was in relation to a swab from the front
 12 nearside wing?
 13 A. That's correct.
 14 Q. Were other swabs also taken from the front nearside
 15 wing, some of which suggested DNA from Xavier being
 16 present but with lower degrees of probability?
 17 A. Yes, that's correct.
 18 Q. Were swabs also taken from the front and underside of
 19 the van containing a full profile relating to
 20 Christine Archibald?
 21 A. Correct.
 22 Q. May I move on to the Molotov cocktails which we can see
 23 at {DC7283/134}. First of all, the bottles themselves,
 24 what was the result of DNA work on those?
 25 A. So DNA samples were taken from the bottles and analysed.

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1 The results identified Redouane's DNA was present on the
 2 devices with a trace of Butt and Zaghba also shown.
 3 Nobody else's DNA was found.
 4 Q. Over the page, 5.22, was separate DNA work done on the
 5 wicks inserted into the bottles?
 6 A. Yes, that's correct.
 7 Q. What was its conclusion?
 8 A. There were traces of all three attackers' DNA, but
 9 mainly Redouane and Zaghba.
 10 Q. Was any other contributor identified?
 11 A. No.
 12 Q. You have told us a little in the past about the fabric
 13 used to make the wicks. Was it identified to any
 14 particular items?
 15 A. Yes, they were identified to item SPT/18, which was
 16 a pair of grey jogging bottoms, and they had a large
 17 section of the leg cut away.
 18 Q. From where had they been recovered?
 19 A. They were recovered from Redouane's address.
 20 Q. You've told us already about the composition of the
 21 liquid in the bottles. Were tests carried out to
 22 determine viability?
 23 A. Yes, they were.
 24 Q. You have told us already that they could have sustained
 25 a flame, depending on the wick?

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1 A. That's correct.
 2 Q. Was there any evidence of the attackers having attempted
 3 to use any of the Molotov cocktails?
 4 A. No, there was not.
 5 Q. May we next turn to the knives, please. First of all,
 6 was a knife recovered near to Zaghba's body?
 7 A. Yes, it was.
 8 Q. Was a DNA profile for Zaghba himself found to be
 9 present?
 10 A. Yes, correct.
 11 Q. Were any DNA profiles for the victims identified in
 12 relation to that knife?
 13 A. Yes, there was DNA discovered and thought to be relating
 14 to Kirsty Boden and Sébastien Bélanger.
 15 Q. Was a knife found attached to Redouane's wrist?
 16 A. Yes, it was.
 17 Q. Beyond Redouane's DNA on that weapon, were profiles
 18 found for any of the victims?
 19 A. So there were full DNA profiles for Ignacio Echeverria
 20 and Sébastien Bélanger. DNA was also thought to be
 21 related to Sara Zelenak.
 22 Q. Finally in relation to the knives, was a knife taken
 23 from Butt?
 24 A. Yes, it was.
 25 Q. Beyond his DNA were any profiles for any of the victims

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1 identified on that item?
 2 A. There was a full profile for Alexandre Pigéard and
 3 further DNA traces were thought to be relating to Sara
 4 Zelenak, Sébastien Bélanger and Zaghba himself.
 5 Q. Next, the mock suicide vests. If we can have on screen
 6 {DC7283/135}.
 7 THE CHIEF CORONER: Mr Hough, I'm going to suggest we break
 8 there because there's something that I need to attend to
 9 which means we get a slightly longer lunch break --
 10 MR HOUGH: Yes.
 11 THE CHIEF CORONER: -- but we will sit again at 2 o'clock.
 12 (12.44 pm)
 13 (The Luncheon Adjournment)
 14 (2.03 pm)
 15 THE CHIEF CORONER: Yes.
 16 MR HOUGH: Detective Superintendent Riggs, before the lunch
 17 break I was asking you, or about to ask you, about the
 18 mock suicide vests as part of the forensic
 19 investigations. If we can look at those, please, on the
 20 screen, or an example of one, {DC7283/135}. This is
 21 a mock explosive belt found slightly closer to Zaghba on
 22 Stoney Street; do you see that?
 23 A. Yes, I can.
 24 Q. What examinations were carried out on this, and with
 25 what result?

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1 A. So with regards to DNA evidence, the one that was found
 2 nearest Zaghba, they found that there was DNA for Zaghba
 3 that was present and had contributed to that DNA, and
 4 also for Redouane as well.
 5 Q. The bottles specifically, did they have DNA from
 6 Redouane on the inside bottle cap and screw thread and
 7 DNA which could have been from Zaghba on the same area?
 8 A. Yes, that's right.
 9 Q. So suggesting that those two may have been involved in
 10 constructing the belt?
 11 A. That's correct.
 12 Q. Was a further belt found in Stoney Street near the
 13 bodies of Redouane and Zaghba?
 14 A. Yes, they were.
 15 Q. Slightly closer to Redouane?
 16 A. Yes, that's correct.
 17 Q. Were equivalent findings about DNA made in relation to
 18 this belt, so DNA from Redouane present, and Zaghba
 19 could have contributed DNA?
 20 A. Yes, that's right.
 21 Q. Thirdly, was a mock explosive belt found by the body of
 22 Butt in Stoney Street?
 23 A. Yes, it was.
 24 Q. Was DNA found from Redouane on this belt as well?
 25 A. Yes.

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1 Q. Looking at the belts collectively, were fingerprints
2 recovered from the adhesive tape showing that Redouane's
3 and Zaghba's fingerprints were on the various belts?
4 A. Yes, they were.
5 Q. Was the tape used in the construction of the belts also
6 identified as comparable to tape found at Redouane's
7 address?
8 A. Yes, that's right.
9 Q. Do the forensic examinations of the belts show DNA from
10 anyone other than the three attackers present?
11 A. No, they do not.
12 Q. You told us when you gave evidence earlier that both
13 Butt and Zaghba discarded jackets outside Elliot's Café,
14 shortly before they approached Black & Blue?
15 A. Yes, that's right.
16 Q. Were you able to recover those two jackets from the
17 scene?
18 A. Yes, we were.
19 Q. Were you able to satisfy yourselves that they were,
20 indeed, the jackets of those two attackers?
21 A. Yes, they were.
22 Q. Moving on to a section of your report headed "Choice of
23 methodology", did you identify any evidence in your
24 inquiries about how the attackers chose London Bridge
25 and Borough Market for their murderous assault?

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1 A. No, none whatsoever.
2 Q. You have obviously seen the evidence of the mobile phone
3 programmed with the application and directions to Oxford
4 Street. Was there any indication of hostile
5 reconnaissance at any particular area?
6 A. No.
7 Q. Was there any evidence from the mobile devices which
8 DS Ager has taken us through in detail, to suggest any
9 particular research relevant to the planning of the
10 attack?
11 A. No.
12 Q. We obviously saw some examples on the phone of images of
13 iconic buildings in the Westminster area.
14 A. Yes.
15 Q. But no clear idea of what searches had been done to get
16 those?
17 A. That's right.
18 Q. As to inspiration for the attack, is it the case that
19 an Islamic State publication in November 2016, among
20 others, had advocated vehicle-as-weapon attacks?
21 A. Yes, that's right.
22 Q. Did that, as we've heard in general terms of such
23 publications, advocate the use of heavy vehicles?
24 A. Yes, it did.
25 Q. Did it also have anything to say about targets, route

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1 and other means of carrying out an attack which may have
2 been reflected in this attack?
3 A. Yes, it did.
4 Q. In particular, did it suggest filling the vehicle with
5 sufficient fuel and having secondary weapons?
6 A. Yes, it did.
7 Q. Although the attackers have some evidence of having
8 looked at Islamic State material, was there any positive
9 evidence that they had read any Islamic State
10 publications or other extremist publications describing
11 the method of vehicle-as-weapon attacks?
12 A. No.
13 Q. So it must be purely a matter of speculation whether
14 they may have done?
15 A. That's right.
16 Q. We've also heard that there were a number of
17 vehicle-borne terrorist attacks in Europe during the
18 years preceding this one. Once again, though, is there
19 anything in any of the digital media or other evidence
20 that you unearthed suggesting that any particular
21 previous attack acted as an inspiration?
22 A. No, no evidence.
23 Q. Following the attack, did an issue of another Islamic
24 State publication claim responsibility for the attack?
25 A. Yes. There was a publication on 10 June that suggested

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1 responsibility for Isis.
2 Q. However, is it very possible, indeed likely, given the
3 attackers' lack of obvious communication with anyone
4 from that organisation, that it wasn't an attack in any
5 way directed by that organisation?
6 A. There's nothing specific that linked them.
7 Q. From all your work and all your inquiries, is there
8 anything to suggest that this was an attack in any way
9 directed from overseas, coordinated by any wider
10 network?
11 A. No, there's no evidence of that.
12 Q. However, in the years preceding this attack, as we have
13 heard, there have been a number of calls to arms by
14 Islamic State, including calls to arms encouraging
15 attacks on western civilians?
16 A. That's right, yes, sir.
17 Q. In conclusion, you've told us about the scale and
18 intensity of your investigation, including to determine
19 whether anyone else was involved in the attack. You
20 told us before that you had no evidence, positive
21 evidence, that anyone else was involved; does that
22 remain your assessment?
23 A. Yes, it does.
24 Q. Including taking account of all the evidence that's come
25 out in these Inquests?

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1 A. Yes, it does.
 2 Q. And no positive evidence that we have heard beyond
 3 reference by Witness L to a piece of fragmentary
 4 intelligence that anyone else knew that any kind of
 5 attack was contemplated?
 6 A. That's right, sir.
 7 MR HOUGH: Thank you very much, those are all my questions.
 8 A. Thank you.
 9 Questions by MR PATTERSON QC
 10 MR PATTERSON: Officer, just touching upon some of those
 11 matters you were dealing with towards the end --
 12 A. Yes, sir.
 13 Q. -- there. The propaganda for quite some years has
 14 emphasised the use of vehicles as lethal weapons in
 15 carrying out terror attacks; that's right, isn't it?
 16 A. Some publications have, yes, sir.
 17 Q. The well known ones linked to Islamic State?
 18 A. Some of them, yes, sir. Yes.
 19 Q. And a significant gap in our understanding of the
 20 researches of the attackers is that, as we heard from
 21 one of the earlier police witnesses, we know that the
 22 three attackers had phones that they were using
 23 extensively in the months leading up to the attacks and
 24 those particular phones were never recovered?
 25 A. We did not recover their phones, no.

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1 Q. And there has been some speculation, I think, from
 2 Detective Sergeant Ager, as to the time on the day
 3 itself when they stopped being used, quite late I think
 4 in the afternoon or early evening of the 3rd?
 5 A. That's right, sir, and it is speculation. We cannot be
 6 sure.
 7 Q. But we do know they had them and therefore, for example,
 8 equally in relation to issues such as previous
 9 reconnaissance trips, you can't conclusively say that
 10 there were no previous reconnaissance trips?
 11 A. Not conclusively, sir. We've obviously done
 12 investigation work with regards to vehicles, phones,
 13 call data, cell site analysis and CCTV with the items
 14 that we know of, the numbers that we know of. None of
 15 that shows any hostile reconnaissance.
 16 Q. So you have found none but can you be sure that there
 17 were no reconnaissance trips?
 18 A. What we couldn't eliminate is if they individually did
 19 that on foot, beyond the realms of the CCTV that we were
 20 able to capture, sir.
 21 Q. So finding them moving about on foot would be a needle
 22 in a haystack, wouldn't it?
 23 A. Yes, sir.
 24 Q. And the encouragement from Islamic State to attack the
 25 non-believers in their homelands, particularly came with

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1 the infamous fatwa by their spokesman, Adnani, back
 2 in September 2014; that's right, is it?
 3 A. Your accuracy on dates would probably be better than
 4 mine on that, sir, yes.
 5 Q. Well, in fact you deal with it in your report on page 26
 6 and if you look at paragraph 6.5, you summarise the
 7 evidence of Mr Dowling, who is something of an expert on
 8 these things, is he not?
 9 A. Yes.
 10 Q. That:
 11 "Abu Mohammed al-Adnani was considered to be Isis'
 12 primary spokesman ... in 2016 he became [their]
 13 second-in-command. [He] has released a number of
 14 speeches, one significantly from September 2014
 15 encouraged the killing of 'disbelievers', whether
 16 military or civilian. [The] speech is believed to be
 17 a significant influence in the rise of the attacks seen
 18 against western targets including those using a vehicle
 19 as a primary weapon in Nice and Berlin in 2016."
 20 A. That's right, sir.
 21 Q. And we know, don't we, there was a wealth of evidence
 22 that was found suggesting that Khuram Butt was looking
 23 at Isis -type material for months and indeed years prior
 24 to the attack?
 25 A. He was looking at material, yes, sir.

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1 Q. And we've heard about the links between ALM figures and
 2 Isis, and the conviction, for example, of the leading
 3 figure, Anjem Choudary, for encouraging support for
 4 Isis?
 5 A. Yes, sir.
 6 Q. Just in relation to Butt and his ideology, can we look
 7 again, please, at one of the messages we saw earlier in
 8 the hearings, {DC8151/322}. You will remember, officer,
 9 that DS Ager gave us some assistance with the ILM
 10 WhatsApp group?
 11 A. Yes, sir.
 12 Q. And it may be that we took this too quickly and we
 13 didn't in fact draw out the significance of part of this
 14 particular message. This is in October 2016, and it was
 15 a message in which Khuram Butt posted words about
 16 tyrants and disbelievers. You may remember this
 17 evidence?
 18 A. Yes, sir.
 19 Q. And if we look at the wording, at the top of the page:
 20 "All praise is to Allah and peace, blessings and
 21 honour upon the final messenger and his true followers.
 22 "My dear brothers.
 23 "Indeed by the signs especially of the political
 24 events we are living in the end of times."
 25 And then he goes on asking for guidance and help,

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1 and he speaks about the:
 2 "... land of disbelief and tyrants while we claim to
 3 believe in the lord of All the creation ... Allah has
 4 promised the believers victory ..."
 5 And he speaks about facing oppression, and seeking
 6 guidance to "jannah firdaus" which we were told is the
 7 highest level of paradise, and asking for victory to
 8 come soon.
 9 Now, in relation to that, you have been a counter
 10 terrorism officer for quite some time; is that correct?
 11 A. Yes, sir. Well, almost two years, sir, so ...
 12 Q. Yes, and in that time no doubt you have, in your
 13 investigations, looked at a large body of this sort of
 14 material?
 15 A. Yes, sir.
 16 Q. And we often see, do we not, in these sorts of cases,
 17 expressions about seeking paradise or martyrdom?
 18 A. That can be the case, yes, sir.
 19 Q. And we can often see references to hellfire. Have you
 20 come across that?
 21 A. Sometimes.
 22 Q. And we often see references to the end of time, don't
 23 we?
 24 A. Sometimes.
 25 Q. And the notion that sometimes emerges in the minds and

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1 in the ideology of extremists and those contemplating
 2 terror attacks is that they are facing impending
 3 judgment, and that there is a final battle and
 4 an obligation to fight in their cause; have you come
 5 across references along those lines in some of the
 6 ideology?
 7 A. In some cases, yes.
 8 Q. That a person needs to discharge their duty so that on
 9 the forthcoming judgment day, they will attain paradise
 10 and martyrdom? We sometimes see those sorts of
 11 sentiments being expressed, do we not?
 12 A. Yes, sir.
 13 Q. You have touched in your report on the various terrorism
 14 offences that are available to officers investigating
 15 this sort of activity. A charge which is often used by
 16 prosecutors is section 5 of the Terrorism Act 2006,
 17 that's right, isn't it?
 18 A. It can be, yes, sir.
 19 Q. Which makes it a criminal offence to -- in summary,
 20 a criminal offence to make preparations for a terrorist
 21 attack?
 22 A. Yes, sir.
 23 Q. So if somebody is arrested at the airport before they've
 24 flown to Syria to fight for Isis, or if somebody is
 25 arrested before they have executed their plot, if you

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1 can prove that there were preparatory steps, then the
 2 offence can be committed?
 3 A. It can be, sir.
 4 Q. But it's right, isn't it, that if there's no evidence of
 5 actual final preparations, there is no offence that is
 6 committed by somebody who might nevertheless have made
 7 up their mind and expressed a willingness to launch
 8 a terror attack?
 9 A. As you know, sir, we always have to rely on the evidence
 10 and in some cases that's not always possible to achieve
 11 charges in relation to it, so it is reliant on evidence,
 12 yes.
 13 Q. Yes, and that's one of the challenges, isn't it: that
 14 often you will have somebody who might be under
 15 investigation who will have made that significant
 16 psychological step of being willing to die and willing
 17 to fight and willing to commit a terrorist attack, but
 18 at that stage, even if that can all be proved, no
 19 offence has been committed?
 20 A. We will always rely on the evidence, sir.
 21 Q. But if you had a suspect in that situation, has any
 22 offence been committed?
 23 A. In which situation, sir?
 24 Q. The one I've just described.
 25 A. Can you be clear about which bit that is, sir?

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1 Q. Yes. Somebody who has expressed a willingness to carry
 2 out a terrorist attack; is that a crime?
 3 A. I think we would take that very seriously, sir, in terms
 4 of our considerations and what action we would take, but
 5 it does rely on evidence, sir, and how we can prove
 6 that.
 7 Q. Yes.
 8 THE CHIEF CORONER: Mr Patterson, if we're looking
 9 particularly at section 5 --
 10 MR PATTERSON: Yes.
 11 THE CHIEF CORONER: -- the intention which is central to
 12 section 5 is often the most -- as you and I will know
 13 from cases in this building -- is often the most
 14 difficult part of that offence to prove.
 15 MR PATTERSON: Yes, that's right.
 16 THE CHIEF CORONER: You may be able to show an act which
 17 potentially is in furtherance of an act of terrorism,
 18 but actually proving that the person intended to do that
 19 can often be the stumbling block, and the difficulty of
 20 evidence that the officer is saying in her answers to
 21 you.
 22 MR PATTERSON: Yes, that's right. So often if the plane
 23 ticket has been purchased, obviously the issue at trial
 24 will often be was the intention to fly and engage in
 25 terrorist activity or for some innocent activity; yes?

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1 A. Possibly, yes.
 2 Q. Yes. And so going back to my scenario, we can't
 3 identify a criminal offence that is committed by anybody
 4 who expresses, even publicly, a willingness to commit
 5 a terrorist attack; can you help us, can you identify
 6 a crime that would be committed by such a person?
 7 A. No, sir.
 8 Q. Another offence that sometimes arises is section 38(b)
 9 of the Terrorism Act 2000 which deals with failing to
 10 disclose, and you have touched upon this already today,
 11 haven't you?
 12 A. Yes, sir.
 13 Q. So one of the issues that you considered was whether in
 14 relation to people close to Khuram Butt, whether they
 15 had knowledge of any planned attack; yes?
 16 A. Yes, sir.
 17 Q. And we've had evidence from, for example, his wife and
 18 from his brother, and both in your interviews with them
 19 and in the questions in the hearings in this Inquest,
 20 consideration was given to whether they knew of any
 21 planned attack; yes?
 22 A. That's right, sir.
 23 Q. And, again, before a crime is committed it has to be
 24 proven that they had information which they knew or
 25 believed might be of material assistance in preventing

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1 the commission of an act of terrorism; is that right?
 2 A. Yes, sir.
 3 Q. So if they believe that a friend or relative is
 4 an extremist, that's not a crime if they don't report
 5 it?
 6 A. No, sir.
 7 Q. If they believe that he is an extremist and he could be
 8 dangerous but they don't report it, that's not a crime?
 9 A. No, sir.
 10 Q. It has to be shown that they -- basically that they knew
 11 that he was planning an attack?
 12 A. Like I've said, sir, we always rely on evidence and we
 13 need evidence to corroborate some of the suspicions that
 14 we may have.
 15 Q. Yes. But do you agree that it's necessary, essentially,
 16 to prove that the person knew that an attack was being
 17 planned? That's usually the nub of the issue, isn't it?
 18 A. And it relies on evidence to prove that, sir, yes.
 19 Q. Yes. You don't need to prove a date and the location
 20 and the details of the target, do you? It's enough that
 21 if they knew that an attack was planned, that would be
 22 sufficient for the crime to be committed, wouldn't it?
 23 A. I think in terms of any charging decision that would sit
 24 with our colleagues in the Crown Prosecution Service and
 25 every case is assessed on an individual basis.

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1 Q. We have heard evidence from some witnesses as to
 2 reporting to the authorities the behaviour of
 3 Khuram Butt, and we've heard that there was a report
 4 that was made in September 2015 by Usman Darr.
 5 Saad Butt gave evidence that there was an additional
 6 report. He told the Coroner that Hashim, the brother of
 7 Zahrah Rehman, made a report. Have you considered that
 8 and whether there's any record of such a report ever
 9 having been made?
 10 A. There's no record of that.
 11 Q. So, so far as you're concerned the only report that is
 12 recorded is that of Usman Darr; is that correct?
 13 A. Yes, that's correct.
 14 Q. And although other people such as Zahrah Rehman, his
 15 wife, knew quite a lot, and although her father, Abdul
 16 Rehman-Butt knew quite a lot about his extremism,
 17 neither of them made any report prior to the attack; is
 18 that correct?
 19 A. That's correct.
 20 Q. You have told us about the large number of individuals
 21 who were arrested and interviewed. Is it necessary to
 22 arrest somebody before you can interview them about what
 23 they might be able to tell you?
 24 A. I think that that is a choice of the officer, the
 25 decision-making with regards to arrest. In this

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1 particular case it was the senior investigating officer
 2 that made the policy decision that that would happen.
 3 Q. But as a general rule, a police officer can obtain
 4 information from a potential witness without necessarily
 5 arresting them; yes?
 6 A. Well, if they were a witness, they wouldn't be arrested,
 7 sir.
 8 Q. Yes. And you can interview somebody without arresting
 9 them, can't you?
 10 A. There are occasions when interviews may occur, sir, yes.
 11 Q. Without arrest?
 12 A. On occasion, sir, but it would really depend on the very
 13 unique circumstances.
 14 Q. And before an arrest can be made, there has to be
 15 reasonable grounds to suspect the commission of
 16 a criminal offence; that's right, isn't it?
 17 A. What are we referring to here now, sir? This particular
 18 case?
 19 Q. Police powers of arrest.
 20 A. Under the Police and Criminal Evidence Act? Under
 21 terrorist arrests?
 22 Q. Let's take it in stages. The arrests that took place in
 23 this case of the 12 family members, did that require
 24 suspicion before there was power to arrest?
 25 A. There was a policy decision in the absence of knowing

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1 what the network or potential network may be, because of
 2 the risk posed and because of the actions that had
 3 happened at the night, that those at the address would
 4 be arrested.
 5 Q. Yes, but as a matter of law, help us, please, is it
 6 necessary to have grounds to suspect, or is that not
 7 necessary in terrorist cases?
 8 A. I think in most cases -- in all cases where people are
 9 arrested, sir, there will always be a suspicion.
 10 Q. Right, so there is that legal requirement before
 11 an arrest can be made; is that correct?
 12 A. I think if an arrest is going to be made there would
 13 always be some degree of suspicion to put them into that
 14 criteria, sir.
 15 Q. And that suspicion doesn't require actual admissible
 16 evidence; it can be based on intelligence or hearsay or
 17 information of that sort; is that right?
 18 A. I think it would depend on the scenario, sir. I think
 19 it depends on what you're referring here.
 20 Q. Well, as a matter of general policing do you need
 21 a section 9 witness statement before you arrest somebody
 22 on suspicion?
 23 A. No, sir.
 24 Q. No. We've heard evidence from a large number of sources
 25 that somebody who Khuram Butt was associated with over

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1 quite some time was Anjem Choudary; yes?
 2 A. We've certainly heard evidence throughout this Inquest,
 3 sir, with regard to his association, yes.
 4 Q. And I think you've been in court most days --
 5 A. Yes.
 6 Q. -- and would agree that his name has been mentioned by
 7 witnesses day after day, has it not?
 8 A. It has, sir.
 9 Q. We've heard evidence that Khuram Butt was energised by
 10 him, haven't we?
 11 A. We have, sir. We've heard that, yes.
 12 Q. We've heard evidence that he idolised Choudary; yes?
 13 A. That is what has been reported, yes, sir.
 14 Q. And we've heard evidence from MI5 that there was
 15 intelligence that he was meeting with Choudary, we've
 16 heard evidence from I think Mr Jolley about meetings at
 17 both Choudary's home address and, indeed, at Butt's home
 18 address?
 19 A. Yes, sir.
 20 Q. What's your assessment as to the three attackers? Is it
 21 your assessment that Butt is likely to have been the
 22 leader?
 23 A. It's possible, sir. It's possible.
 24 Q. Or would you suggest that one of the others --
 25 A. It's not categorical, no.

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1 Q. Would you suggest that Redouane might have been the
 2 leader, or Zaghba?
 3 A. It's hard to say, sir, based on the information that
 4 we've managed to gather, who is the leader of those
 5 individuals.
 6 Q. But you would agree that Butt played a significant role?
 7 A. Of course, yes.
 8 Q. Now, the evidence that we've heard about Butt's
 9 association with Choudary includes 2014, around the time
 10 when Choudary was arrested; that's right, isn't it?
 11 A. Yes.
 12 Q. And in 2015 when he was on police bail, and then there
 13 came a time when he was charged with inviting support
 14 for Isis.
 15 A. Yes.
 16 Q. And then the association continued, did it not, on the
 17 evidence we've heard, up to 2016 when he was tried and
 18 convicted and imprisoned?
 19 A. Yes.
 20 Q. Mr Jolley gave us evidence that one of the people who
 21 you spoke to, a significant person in helping you with
 22 the background of Butt, was an individual called
 23 Hamza Raza.
 24 A. Yes, sir.
 25 Q. And he gave you a witness statement in which he spoke,

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1 did he not, about the association between Khuram Butt
 2 and Choudary?
 3 A. He did give that in his statement, sir, yes.
 4 Q. And how influential Choudary was to him; yes?
 5 A. Yes, sir.
 6 Q. He was the one who said that Butt was like a lion out of
 7 a cage with Choudary around?
 8 A. That's what he said sir, yes.
 9 Q. And he said this in relation to Butt, he said, and this
 10 is page 11 of his statement, speaking about what Butt
 11 was saying, he said the line that Butt was famous for
 12 was:
 13 "" Anjem Choudary is right: we should get our free
 14 money that the government give, that's our money to
 15 attack the west, to attack the British, to attack the
 16 Americans. We should use their money to attack
 17 themselves.' That's what he used to think about because
 18 Anjem Choudary used to tell [Butt] this, and he [Butt]
 19 would come back and tell us this."
 20 That's what Raza told you, isn't it?
 21 A. That's what's in the statement, sir, yes.
 22 Q. Can you just help us with that, please: why was
 23 Anjem Choudary not spoken to and asked to assist your
 24 investigation into Khuram Butt and his radicalisation
 25 and extremism and his background?

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1 A. He wasn't deemed an individual that was necessary to be
 2 discussing that with, sir. At the time of the offence
 3 he was actually in custody, at the time of the attack.
 4 Q. But he has been released from custody for quite some
 5 time now, hasn't he?
 6 A. I think he's been out the beginning of this year, sir.
 7 Q. And you can speak to people even when they are in
 8 prison, can you not? It frequently happens with police
 9 investigations; isn't that right?
 10 A. That is right, sir.
 11 Q. Did you not consider seeing what he could say about
 12 Khuram Butt and those crucial years of 2014 and 2015 and
 13 2016 and his ideology and radicalisation?
 14 A. No, sir.
 15 Q. So to this day do we know what Anjem Choudary has to say
 16 about Butt and what assistance he can give?
 17 A. No, sir.
 18 Q. Or what he says about the suggestion from the friend,
 19 Hamza Raza, that he was encouraging Butt --
 20 A. No.
 21 Q. -- to use that money to attack this country?
 22 A. No, sir.
 23 Q. He is dealt with in your report under the heading
 24 "People of interest", isn't he?
 25 A. Yes, sir.

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1 Q. A different topic, please. Can you help us with the
 2 date when the gym was searched?
 3 A. That was 8 June.
 4 Q. And presumably like all police searches, records would
 5 have been made as to that search and what was found?
 6 A. Yes.
 7 Q. Finally this, please: you spoke about the report from
 8 Mr Fenne in relation to the knives. It was suggested by
 9 Mr Hough that one of his opinions was somewhat
 10 speculative. Is there a second expert who has reported
 11 on this topic or is it only Mr Fenne?
 12 A. Just Mr Fenne, sir.
 13 MR PATTERSON: Yes, thank you very much. Those are the only
 14 matters I wanted your help with. Thank you.
 15 Questions by MR RADCLIFFE QC
 16 MR RADCLIFFE: Superintendent, Mr Patterson who has just
 17 been asking you questions asked DCI Jolley a number of
 18 questions on Day 17, 30 May this year, about the
 19 radicalisation of Khuram Butt and the information by way
 20 of background material that the investigators have
 21 gathered, and from the various different sources; do you
 22 remember that?
 23 A. Yes, sir.
 24 Q. Now, understandably, this was an area of the evidence
 25 that the families of the deceased persons wished to

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1 probe, one follows that. Now, I don't want to cover the
 2 same ground with you but I do ask for your help in one
 3 specific regard, but before doing so, could I just make
 4 this clear: I think that you can confirm that in your
 5 position as the senior investigating officer, you and
 6 your deputy, DCI Jolley, are equally familiar with all
 7 of the material?
 8 A. Yes, sir.
 9 Q. All right. Now, to place my questions in context,
 10 dealing with Khuram Butt's background, in general terms
 11 on the balance of the evidence and the information
 12 obtained, did it appear that Khuram Butt had lived
 13 a westernised lifestyle until about the end of 2012?
 14 A. Yes, sir.
 15 Q. Drinking alcohol, smoking, using cannabis regularly and
 16 partying?
 17 A. Yes, sir.
 18 Q. Now, it's apparent that his interests in Islam began to
 19 appear at around that time; that's correct, isn't it?
 20 A. Correct.
 21 Q. Initially, does it appear that one of the people that he
 22 turned to in order to learn about his religion, was
 23 Hashim Rehman, Zahrah's brother?
 24 A. Yes.
 25 Q. And, of course, we've heard evidence that the two

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1 families had known each other for a number of years
 2 before, indeed, Zahrah met Khuram Butt as an adult?
 3 A. That's right.
 4 Q. Now, it may be that you would agree that there is
 5 a world of difference between having a legitimate
 6 interest in religion and becoming or being an observant
 7 Muslim on the one hand, and being or becoming a radical
 8 extremist on the other?
 9 A. Yes.
 10 Q. I'm going to be asking you in a moment about Hamza Raza
 11 whose name appeared again just a few moments ago, but
 12 who Mr Patterson referred to when he was questioning
 13 DCI Jolley. Now, it was said by Mr Patterson that
 14 Hamza Raza had provided quite a lot of information about
 15 the radicalisation of Khuram Butt. Do you remember
 16 that?
 17 A. He did, yes.
 18 Q. Sir, for your note, this is Day 16 at page 92.
 19 And at the same time Mr Patterson was suggesting
 20 that in terms of influential people when focusing on the
 21 radicalisation of Khuram Butt, that according to
 22 Hamza Raza, Hashim Rehman was one of the influences in
 23 Khuram Butt's changing attitudes; do you remember that
 24 evidence?
 25 A. Yes.

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1 Q. Now, other people were also specifically identified by
 2 Mr Patterson in this regard, and not least
 3 Anjem Choudary, and I make it clear, Superintendent,
 4 I'm not suggesting that he was wrong in that specific
 5 regard. But as to Hashim Rehman, did you obtain quite
 6 a large amount of information, particularly from the
 7 families, and by that I mean both sides of the wider
 8 family, the Khuram Butt side and also the Rehman family,
 9 and did that evidence deal with Hashim's character, his
 10 dealings with Khuram Butt in relation to Islam?
 11 A. Yes.
 12 Q. And did they include Khuram Butt's sister, Haleema, who
 13 is going to give evidence in about ten days' time,
 14 I think, and did they speak of Hashim as being a young
 15 man who was knowledgeable on the subject of Islam,
 16 that's one point?
 17 A. Yes.
 18 Q. Because he had studied Islam -- I am not suggesting
 19 an university course or anything like that, but in the
 20 religious context?
 21 A. Yes.
 22 Q. And did it appear that it was to Hashim that Khuram Butt
 23 first turned for information about his religion when
 24 that interest was sparked or began?
 25 A. Yes.

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1 Q. Did these witnesses, though, also describe Hashim as
 2 holding moderate views as, of course, the overwhelming
 3 majority of Muslims in this country do?
 4 A. Yes.
 5 Q. From the evidence that this Inquest has heard, it may be
 6 that it was in the latter part of 2014 that
 7 Khuram Butt's views became increasingly radical, and
 8 that's the evidence we've heard about watching YouTube
 9 videos, becoming consumed with the events in Syria and
 10 Iraq, and beginning to mix with individuals whom we've
 11 heard held extremist views; yes?
 12 A. Yes.
 13 Q. And does that date seem about right --
 14 A. Yes.
 15 Q. -- on all the information that you've gathered?
 16 A. Yes.
 17 Q. Now, Hashim himself hasn't been asked to give evidence
 18 at this Inquest, but I think it's correct that he made
 19 a statement in the course of the investigation to you?
 20 A. He did.
 21 Q. Did he describe Khuram Butt as becoming increasingly
 22 rigid in his opinions as time progressed, and to the
 23 extent that Hashim said he was unable to get through to
 24 Khuram Butt?
 25 A. He did describe that, yes.

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1 Q. Did Hashim also say that he disagreed completely with
 2 Khuram Butt, to the extent, in his words, Hashim's
 3 words, that he stopped discussing theological matters
 4 with Khuram Butt?
 5 A. He does describe that, yes.
 6 Q. And sir, again for your note, it's {WS0158/5}.
 7 THE CHIEF CORONER: Thank you.
 8 MR RADCLIFFE: And when asked by the investigators about all
 9 of this I think he actually used the phrase that he
 10 avoided talking to him about religion "at all costs".
 11 A. He does say that in his statement, yes.
 12 Q. That's the same reference.
 13 Did Hashim say that as time progressed he would then
 14 only see Khuram Butt once every few weeks?
 15 A. He does, yes.
 16 Q. And I think Haleema, Khuram Butt's sister, also
 17 described his falling out or distancing or separation
 18 between the two young men, with Hashim Rehman on the one
 19 part, Khuram Butt on the other?
 20 A. She does, in her statement, yes.
 21 Q. And I think that on her understanding or her account of
 22 her understanding was that they hadn't spoken -- that's
 23 presumably hadn't spoken about religious matters -- for
 24 two years prior to the attack in June 2017?
 25 A. She does state that, yes.

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1 Q. And that was because of their conflicting views?
 2 A. As she described it, yes.
 3 Q. As she describes it.
 4 Now, Superintendent, can I turn to Hamza Raza, and
 5 the statement that he has made that reference has been
 6 made to now on these different occasions. Sir, this is
 7 {WS1225/1}.
 8 THE CHIEF CORONER: Thank you.
 9 MR RADCLIFFE: Now, Hamza Raza, I think, referred to the
 10 influence on Khuram Butt of Khuram Butt's
 11 brother-in-law; is that right?
 12 A. Would you mind if we bring up his statement?
 13 Q. Yes, of course.
 14 A. Just as a reminder, thank you.
 15 Q. This is {WS1225/1}.
 16 I think, Superintendent, you have had an opportunity
 17 to look at this in advance of giving evidence this
 18 afternoon?
 19 A. Yes.
 20 Q. Is there a particular part you want to look at or shall
 21 I direct you to it?
 22 A. Yes, if you wouldn't mind, thank you.
 23 Q. If we could go, please, to {WS1225/6}, and at the bottom
 24 of page 6, I think what we see, I can direct you I hope
 25 even more precisely than that in a moment.

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1 THE CHIEF CORONER: It's about five lines up from the
 2 bottom, I think.
 3 MR RADCLIFFE: I was going to start two lines up from the
 4 bottom, but thank you, I will be coming to that. Two
 5 lines up from the bottom. Although Hamza Raza referred
 6 to the brother-in-law as having been an influence, he
 7 didn't know the brother-in-law's name, as we can see
 8 there.
 9 A. Yes.
 10 Q. And I think throughout the whole of the statement he
 11 never identifies the brother-in-law by name?
 12 A. Correct.
 13 Q. And it goes a little further than that, I think. If we
 14 go over the page, please, to page 7 -- I'm so sorry,
 15 forgive me.
 16 THE CHIEF CORONER: If we just go back one page,
 17 Mr Radcliffe, because there was a bit, I think in fact
 18 it is -- if we go just below the middle part of the
 19 page:
 20 "When Khuram changed, it was one year before he got
 21 married ..."
 22 There is a section that follows on from there which
 23 is part of the point you are seeking to address where he
 24 says:
 25 "He had a substantial amount of influence on him, he

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1 [is] the one who personally bombarded Khuram with the
 2 knowledge and Khuram got to the point when he would
 3 compete with him. Khuram's knowledge was getting
 4 stronger and stronger and his knowledge got stronger
 5 than his brother-in-law even though his brother-in-law
 6 taught him."
 7 That was the passage that just caught my eye which
 8 I remember reading before and I know you were then
 9 looking towards the bottom of the page.
 10 MR RADCLIFFE: And then we see at the bottom of page there,
 11 just to recap Superintendent:
 12 "I don't know the brother-in-law's name ... he lives
 13 near Barking Part ..."
 14 Et cetera. But if we go over the page, please, to
 15 {WS1225/7} and towards the bottom of that page as well.
 16 Can we go five lines up, please, when Hamza Raza was
 17 speaking with the investigator, so far as this person of
 18 influence was concerned, he wasn't even sure, was he, if
 19 the man was Khuram Butt's brother-in-law at all?
 20 A. Yes, that's right.
 21 Q. Or even related to him?
 22 A. That's what it says, yes.
 23 Q. Or if he was, he could have been a cousin or, in his
 24 phrase, "a far relative"?
 25 A. Correct.

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1 Q. All right. In any event, Superintendent, if I were to
 2 suggest that there is reason to approach what Hamza Raza
 3 spoke of with a degree of caution, would that be
 4 reasonable given some of the matters, I think, that he
 5 described?
 6 A. That would be reasonable, yes.
 7 Q. And, in fairness, these were points that Mr Patterson
 8 also drew out. Hamza Raza, I think, claimed that he
 9 himself -- he, Hamza Raza, had reported Khuram Butt to
 10 the counter terrorist authorities not just once but
 11 twice.
 12 A. So he says, yes.
 13 Q. So he said. And if we go back, please, to page 4 of the
 14 statement, so that there's no confusion on this, and
 15 I think it's -- let me see -- three lines down and then
 16 six lines down, can we see at the top there:
 17 "I will help you as much as I can, and I'll be
 18 honest with you [he said], I'll be open with you [he
 19 claimed], I even reported Khuram to the anti-terrorist
 20 squad myself. You lot did nothing about it. I sent
 21 an email saying I have information on someone who is
 22 watching terrorist videos, material, beheading videos,
 23 he sees it as a gimmick, a joke. To me, I saw he was
 24 slightly brainwashed. I reported him again, I sent this
 25 letter to the anti-terrorist squad ..."

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1 And then describes how he used email to do this on
 2 those two occasions.
 3 If we just stay with that, can I take you to the
 4 last paragraph but one which you can see on the screen,
 5 that he described there using what he said was a fake
 6 email address, which he had styled
 7 "undercover...@hotmail"?
 8 A. That's what he says, yes.
 9 Q. Now it's correct, I think, Superintendent, that there's
 10 no record of his reporting at all, is there?
 11 A. There's certainly no police record of that, that's
 12 right.
 13 Q. No. And we know not only from your reply now but also
 14 from DCI Jolley's answers to Mr Patterson that the
 15 investigators have conducted a thorough search in order
 16 to try to bottom this out?
 17 A. Yes, we have, and there's no record of it.
 18 Q. And no record of either of these separate reports as
 19 Hamza Raza claims?
 20 A. That's right.
 21 Q. Now, anything's possible, but if Hamza Raza is being
 22 truthful and accurate about this, it would seem that not
 23 just one of his reports must have gone astray, but the
 24 second one must have done as well?
 25 A. There's certainly no police record of it.

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1 Q. And did Hamza Raza also tell the investigator that
2 Khuram Butt had had his passport taken away from him by
3 the authorities?
4 A. That's what he says, but we did not see this as
5 possible.
6 Q. So either Hamza Raza had got hold of the wrong end of
7 the stick or he simply wasn't telling the investigators
8 the truth, one or the other?
9 A. One or the other.
10 Q. Can we go back to {WS1225/6} that we looked at just
11 a moment ago, please, because I think on this page,
12 Superintendent, consistent with the email address that
13 he generated for himself, "undercover ...@hotmail" either
14 .co.uk or .com, was he portraying himself to the
15 investigators as something of an undercover agent,
16 telling you that he was invited for dinner when
17 Anjem Choudary was present, and indeed, on one occasion
18 to Choudary's house himself. Can you see that in --
19 thank you, in that first main paragraph.
20 A. Yes.
21 Q. About six lines down, perhaps five lines onwards, can we
22 see him say there that at this stage he had already
23 reported Khuram Butt, which appears not to have been
24 true, but goes on to say that he thought he ought to
25 stick around to see what information he could find out,

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1 having this opportunity almost as a spy to do so?
2 A. That is what he says, yes. But, as we've already
3 stated, there was no record around any reports to the
4 police.
5 Q. Well, that was going to be my next and final question:
6 that even so far as this is concerned, is it right that
7 no report ever resulted to the police from it?
8 A. That's right.
9 MR RADCLIFFE: All right, thank you.
10 Further questions by MR PATTERSON QC
11 MR PATTERSON: I have indicated to Mr Hough there was one
12 topic that, by oversight, I forgot to cover.
13 Officer, the trip to Leeds, please, you told us
14 about that and the Abdoullahi brothers, and you deal
15 with this in your report at page 14, that Gharib and
16 Sirwan Abdoullahi are brothers from Leeds, they were
17 identified as being in phone contact with Butt prior to
18 the attack; do you see that?
19 A. Yes.
20 Q. And you went on to state that both were already under
21 investigation for a separate counter terrorism
22 investigation and as a result of that, they were
23 arrested; is that correct?
24 A. Yes.
25 Q. So were they under investigation from the counter

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1 terrorism police prior to the attack?
2 A. It was a separate investigation, sir, yes.
3 Q. But was that in existence prior to the attack?
4 A. I believe it was, yes.
5 Q. And so does it follow that when Khuram Butt and Redouane
6 travelled to meet them in April of 2017, as we know, up
7 to Leeds, that at that stage those individuals who they
8 were meeting, the Abdoullahi brothers, were themselves
9 under investigation?
10 A. I would need to check on the dates, sir, just to be
11 sure.
12 Q. That would be very helpful if you could?
13 A. Yes.
14 Q. But certainly by 3 June, they were under investigation?
15 A. Yes, sir.
16 Q. And so it may be that Butt and Redouane were associating
17 with terror suspects when they travelled to meet them
18 in April?
19 A. I wouldn't be able to confirm or deny that, sir, with
20 regards to those individuals.
21 Q. But you will check the dates?
22 A. I will.
23 Q. Thank you. And then at page 11 of your report, you also
24 deal with these individuals, and if you turn, please, to
25 paragraph 3.22, about five lines into that paragraph,

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1 you deal with these two individuals in Leeds, the two
2 brothers in Leeds; do you see that?
3 A. Yes, sir.
4 Q. And one of them was known as Abu Talha; is that correct?
5 A. Yes, sir.
6 Q. And we heard about Abu Talha, did we not, in the
7 evidence of Saad Butt to this court; is that right?
8 A. That's right.
9 Q. So to remind us, he's the person that Saad Butt said
10 made that chilling comment at the barbecue at Butt's
11 home address on 14 May: "This is how you gut a kuffar".
12 A. That was Saad's evidence, yes.
13 MR PATTERSON: Thank you very much.
14 MR HOUGH: Thank you, Superintendent. Those are all the
15 questions we have for you for the moment. You will be
16 back.
17 A. Thank you, sir.
18 THE CHIEF CORONER: Thank you very much.
19 A. Thank you, sir.
20 MR HOUGH: And that's all the evidence for today and for
21 this week, sir.
22 THE CHIEF CORONER: Thank you. We will resume on Monday
23 morning at 10 o'clock.
24 MR HOUGH: Thank you, sir.
25 (2.58 pm)

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1 (The court adjourned until 10.00 am on
 2 Monday, 17 June 2019)
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