

# OPUS 2

## INTERNATIONAL

London Bridge Inquests. Inquests concerning the attackers

Day 5A

July 8, 2019

Opus 2 International - Official Court Reporters

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1 Monday, 8 July 2019  
 2 (10.08 am)  
 3 (In the absence of the jury)  
 4 THE CHIEF CORONER: Good morning, Mr Hough.  
 5 MR HOUGH: Good morning, sir.  
 6 THE CHIEF CORONER: Just while we get the jury. We will  
 7 start -- again, the press know that we are dealing with  
 8 witnesses who are covered by various --  
 9 MR HOUGH: Yes, I was going to go through the usual form of  
 10 words, that under orders you made on 19 November last  
 11 year and 12 April this year, our four witnesses today  
 12 have all been anonymised and subject to special  
 13 measures. Their names are being withheld, pseudonyms  
 14 are being used for them. No question may be asked which  
 15 may lead to their identification. They are to be  
 16 screened from the public gallery when giving evidence  
 17 and under section 11 of the Contempt of Court Act 1981  
 18 there shall be no publication of the names of any of the  
 19 officers or identifying information about them in  
 20 connection with these Inquests or their subject matter.  
 21 (In the presence of the jury)  
 22 THE CHIEF CORONER: Good morning, everyone. Nice to see you  
 23 all, and I hope you had a pleasant and restful weekend.  
 24 Mr Hough.  
 25 MR HOUGH: Sir, the first witness is BY28.

1

1 THE CHIEF CORONER: Thank you.  
 2 MR HOUGH: While he is being brought in and for the benefit  
 3 of the lawyers, the order of witnesses thereafter will  
 4 be AY14, E122 and AY37.  
 5 BY28 (sworn)  
 6 THE CHIEF CORONER: Good morning. Please do remain seated  
 7 and speak into the microphone just in front of you. You  
 8 might just need to pull it slightly closer to you.  
 9 A. Yes, thank you, sir.  
 10 THE CHIEF CORONER: Thank you.  
 11 Questions by MR HOUGH QC  
 12 MR HOUGH: Are you an officer of the Metropolitan Police  
 13 Service being known as BY28 in these Inquests?  
 14 A. Yes, I am.  
 15 Q. Do you understand that you are giving evidence about  
 16 your part in the response of the police to the  
 17 Borough Market terror attack on Saturday, 3 June 2017?  
 18 A. Yes, I do.  
 19 Q. You made witness statements on that subject on 4 and  
 20 7 June 2017. You may refer to those as you wish.  
 21 A. Thank you.  
 22 Q. Are you a police constable in the Metropolitan Police?  
 23 A. Yes, I am.  
 24 Q. Did you join police service in 2009?  
 25 A. Yes, I did.

2

1 Q. Were you deployed as an armed response vehicle officer,  
 2 after appropriate training, from 2015?  
 3 A. Yes, that's correct.  
 4 Q. And shortly before June 2017, had you also passed the  
 5 operational firearms commander course, allowing you to  
 6 be a firearms commander on the ground?  
 7 A. Yes, that's correct.  
 8 Q. On 3 June 2017, that Saturday evening, were you on duty  
 9 as an armed response officer?  
 10 A. I was.  
 11 Q. What weaponry did you have with you on that shift?  
 12 A. I had a G36 carbine, my primary weapon; I had an X26  
 13 taser, and a Glock 17.  
 14 Q. That last one is a handgun.  
 15 A. A handgun, yes.  
 16 Q. Were you crewed in a vehicle with our next two  
 17 witnesses, AY14 and E122?  
 18 A. Yes, that's correct.  
 19 Q. Was E122 the driver of the vehicle that shift?  
 20 A. He was.  
 21 Q. Shortly before 10.00 pm had you returned to the police  
 22 base in Lambeth after a relatively uneventful shift?  
 23 A. Yes, that's correct.  
 24 Q. At around 10 o'clock, before you received a call to the  
 25 London Bridge and Borough Market area, what were you

3

1 doing?  
 2 A. Apologies, sorry, I didn't catch that.  
 3 Q. Sorry, at around 10.00 pm, before you received the call  
 4 to the London Bridge and Borough Market area, what were  
 5 you doing?  
 6 A. We were in the process, we'd spoken to our pod, they had  
 7 given authority for us to de-kit our car, so we were in  
 8 the process of de-kitting our car, taking all our kit  
 9 out of our car at that time.  
 10 Q. While you were doing so, did you receive a call over the  
 11 firearms channel on your Airwave radios?  
 12 A. Yes, that's correct.  
 13 Q. What did the call say?  
 14 A. The call had basically come in that a lorry, or a van,  
 15 had actually hit people on London Bridge, possibly  
 16 people were in the water, and other people were injured  
 17 at the time.  
 18 Q. How did you and your colleagues respond?  
 19 A. We have literally thrown all our equipment back into the  
 20 car. We normally kit it back into the boot but a lot of  
 21 it went into the rear passenger seat with me, so there  
 22 was the first aid kit, all our kit bags, the guns were  
 23 still in the safe, the carbines, I mean, but everything  
 24 else had been literally thrown back into the back of the  
 25 car as we had to get out as quickly as possible.

4

1 Q. Was that an instruction from your control to get there  
2 as quickly as possible, or was that your own initiative?  
3 A. That was our own initiative because at the time, due to  
4 previous incidents, Westminster, we believed this  
5 possibly -- or I believed it possibly could be  
6 an attack, especially with people injured and people  
7 being knocked over by a vehicle.  
8 Q. You've indicated that you were going to be in the rear  
9 passenger seat with the equipment you had recently  
10 thrown in. Were you aware, as you were setting off, of  
11 any other armed response vehicles also setting off from  
12 your Lambeth base?  
13 A. Yes, there was another vehicle behind us. I can't  
14 remember the call sign at this time. I can refer to my  
15 notes, if ...  
16 Q. I don't think we need it at the moment --  
17 A. Okay.  
18 Q. -- we have details of the various vehicles that  
19 responded.  
20 Did you set off using blue lights and sirens?  
21 A. Yes, we did.  
22 Q. While you were en route, did you receive further  
23 information over the radio about what had gone on and  
24 what was going on in the Borough area?  
25 A. Yes, we were informed that it was possibly a terrorist

5

1 attack. We had -- North 1 was our back-to-back channel,  
2 we had that in an ear piece, in our ears. We could  
3 literally hear that over -- that was where a lot of  
4 things were being run, but we also had on another  
5 channel the City Link, where the actual incident was  
6 being run on, but a lot of it was actually coming over  
7 our back-to-back North 1 and we were being made aware it  
8 was possibly a terrorist attack.  
9 Q. Did you, however, have any more details about events  
10 other than that there had been a van knocking people  
11 down on London Bridge and this was possibly a terrorist  
12 attack?  
13 A. Yes, there was other detail that there was people  
14 injured and there were people that had been knocked over  
15 and there were people in the water, so in my eyes  
16 I believed this was a terrorist attack.  
17 Q. But was anything being said on your radio to pinpoint  
18 where the potential attackers were?  
19 A. It was saying it was at London Bridge, so that's why we  
20 were making our way to London Bridge. There was also  
21 other things -- Op Plato was called later on, that was  
22 further on the route, on the way to the location.  
23 Q. How long did it take you to drive from Lambeth to the  
24 Borough Market area?  
25 A. Minutes, really. I mean, we were driving as quickly and

6

1 as safely as possible to the location, but we knew there  
2 was people -- many people in danger, so we had to get  
3 there as quickly as possible.  
4 Q. So it was a matter of a small number of minutes?  
5 A. Yes.  
6 Q. You've told us that as you got further towards the scene  
7 you heard that an Operation Plato declaration had been  
8 made. We've heard from others what that meant to them;  
9 what did it mean to you?  
10 A. To me I believed that there -- it was a terrorist  
11 attack. An Op Plato can be classed as a marauding  
12 terrorist firearms attack, but due to other attacks it  
13 can be that there's sort of not specific with firearms  
14 included, it could be other weapons being used, like  
15 knives or IEDs.  
16 Q. Did it suggest there were likely to be armed terrorists,  
17 multiple armed terrorists on the loose?  
18 A. Yes.  
19 Q. As you approached the scene, as you got closer, how did  
20 you feel about what you were likely to face and how you  
21 would have to deal with it?  
22 A. I feared for my life at one point, but I realised I had  
23 to stay focused and stay concentrated on my training.  
24 I've trained a lot for this. We knew it being Op Plato  
25 that we identify, locate and confront the threat and

7

1 neutralise the threat. I also had to take into  
2 consideration if there was injured parts, I had a duty  
3 of care, positive duty of care for those. My main  
4 objective really was to protect the innocent parties and  
5 get there as quickly as I could.  
6 Q. As you approached did you receive any information about  
7 where people had been attacked?  
8 A. En route we were made aware that there was possibly  
9 being people attacked at Southwark Cathedral. We were  
10 informed to carry on, though, to London Bridge, as  
11 that's where the vehicle was -- had stopped and crashed  
12 into London Bridge. So we were told to carry on going  
13 there.  
14 Q. Did you approach the area by going up Southwark Street  
15 from the south?  
16 A. Yes.  
17 Q. We know that Stoney Street, which borders the covered  
18 area of Borough Market, is on the left just as  
19 Southwark Street comes into Borough High Street. As you  
20 were approaching that junction, what could you see  
21 through your windows?  
22 A. When we approached that junction I could see people  
23 running in panic, in fear, from Stoney Street on to  
24 Southwark Street. One person in particular was,  
25 I believe, a 6-foot tall gentleman. All I can describe

8

1 is it looked like he'd been painted in blood. He was  
 2 shouting but pointing towards the street, there was  
 3 others saying "They're killing people", so yeah, I knew  
 4 from that that something was -- there was an immediate  
 5 threat down on Stoney Street.  
 6 Q. You described hearing words shouted. Did you and your  
 7 colleagues have your windows down as you approached?  
 8 A. Yes.  
 9 Q. We've heard from others that that's standard practice  
 10 for officers in your situation in order to both  
 11 understand the scene around and, if necessary, to be  
 12 able to confront a threat by firing through the windows?  
 13 A. Yes, that's correct.  
 14 Q. Did the driver, E122, then turn into Stoney Street?  
 15 A. Yes, he did.  
 16 Q. As you were turning in, did you see or hear anything  
 17 notable?  
 18 A. I heard gunshots when we were turning in. Just prior,  
 19 just while we were turning in, I believed at that time  
 20 it was like a whooshing sound of bullets flying past.  
 21 Q. Could we please put on screen {PH0421/1}. This is the  
 22 view into Stoney Street from the Southwark Street end,  
 23 a photograph taken later that night when the scene had  
 24 cleared.  
 25 What could you see immediately ahead of you as your

9

1 vehicle approached up Stoney Street?  
 2 A. As we approached up Stoney Street I could see there was  
 3 still a lot of people within Stoney Street, sort of  
 4 running back towards Southwark Street.  
 5 I could also see at that time armed police officers,  
 6 I believed at the time to be standing over suspects on  
 7 the floor. Once our car has come to a stop, I've got  
 8 out and moved forward towards the suspects and actually  
 9 towards my other armed colleagues as well.  
 10 Q. Where were your armed colleagues? How far up the road  
 11 and on which side of the road?  
 12 A. My armed colleagues were on the right-hand side, where  
 13 you see the -- I believe that's the boot or the back of  
 14 the armed police vehicle, to the right of that where the  
 15 green shutters, I believe it was a fruit and veg stall.  
 16 Q. We can see a closer image if we look at {PH0424/1}. We  
 17 can see a fruit and veg stall called Ted's Veg  
 18 immediately on the right, the Wheatsheaf pub on the  
 19 left, and then just beyond the fruit and veg stall some  
 20 green pillars. Do you recall where your vehicle  
 21 stopped?  
 22 A. Our vehicle stopped, I would say probably 5-10 metres,  
 23 if not short of the fruit and veg stall, on the  
 24 right-hand side probably in the yellow lines. I'm not  
 25 100 per cent sure exactly if that is correct but we were

10

1 pretty close to that.  
 2 Q. You said you saw armed colleagues over on the right?  
 3 A. Yes.  
 4 Q. What did they seem to be doing as you approached?  
 5 A. They were standing over two subjects. As I approached,  
 6 they had -- you know, they were pointing their carbines  
 7 at the two subjects and I could see what I believed to  
 8 be blood from the subjects and that they'd been shot.  
 9 Q. Did you get out of your vehicle?  
 10 A. Yes, I did.  
 11 Q. From which side?  
 12 A. I got out from the rear offside.  
 13 Q. As you got out, could you see more of the suspects and  
 14 the officers?  
 15 A. Yes. I literally went straight -- as I've passed the  
 16 driver, because in our training we're supposed to cover  
 17 the driver, I've literally passed past the driver to  
 18 move forward with my carbine pointing. I was looking  
 19 around in case there was any possible threats, and also  
 20 there was a fair few people around. I could see they  
 21 were in fear and they were trying to get away, so  
 22 I didn't believe they were a threat, but I was still  
 23 scouting around and looking around in case they was, but  
 24 my main concern was to go to my colleagues and see what  
 25 they actually had in front of them.

11

1 Q. We can now look at a CCTV still, {DC7181/303}. Now,  
 2 this is a still taken from dashcam footage, and we'll  
 3 see the footage shortly, but is this the scene which  
 4 confronted you as your vehicle came to a halt with  
 5 colleagues standing over and covering some suspects?  
 6 A. Yes.  
 7 Q. Now, we know that there was a suspect over to the left  
 8 as well, but were you first aware of him?  
 9 A. I had seen someone over on the left-hand side. It  
 10 wasn't until I actually withdrew later on that  
 11 I realised that he was a suspect, but I did take into  
 12 account there was someone laying on the floor on the  
 13 left-hand side by the Wheatsheaf.  
 14 Q. Looking at this image, where did you first go when you  
 15 got out of your armed response vehicle?  
 16 A. I went over to where you can see the officer, BX44, I've  
 17 literally walked over to where there is, I think it was  
 18 YZ, the subject there. I've then looked over him and  
 19 I believe I've also gone over to look to the other  
 20 subject, RR as well.  
 21 Q. So looking at the one marked YZ, Youssef Zaghba, did you  
 22 notice anything about his appearance and dress?  
 23 A. Yes, he was in all black. He had what I believed to be  
 24 six to eight silver/white packages strapped round his  
 25 chest and wires and a couple of cords coming out of

12

1 those packets.

2 Q. What did you think that was?

3 A. I believed instantly that these were IEDs, improvised

4 explosive devices, so I have made my colleagues aware of

5 this, who were also standing over the other subjects at

6 the time.

7 Q. We can now move to the next page, {DC7181/304} of the

8 same file. Can we see on the upper image that you have

9 come forward on the right, and on the lower image your

10 colleagues, E122 and AY14 are also out of the vehicle

11 and also, as you say, covering the subjects on this side

12 of the road, the right-hand side?

13 A. Yes, that's correct.

14 Q. So you told your colleagues that you had seen what you

15 thought were IEDs; is that right?

16 A. Yes.

17 Q. As you did so, did you also take a look at the man on

18 the floor further along, who we saw was in a striped

19 top?

20 A. Yes, it was a blue top with, I believe, white and red

21 stripes. I did have a look at him and, again, he had

22 what I believe to be 6 to 8 silver/white packages sort

23 of packed on to his chest, around his body, with wires

24 strapped round, and also cords coming off these wires.

25 Q. Could you tell anything about the condition of either of

13

1 the two men who was on the floor, whether they were

2 alive, whether they were conscious?

3 A. Yes, they were both breathing, looking up, looking

4 around. They -- there was small movements, but I was

5 standing over them telling my -- for them not to move or

6 make any sudden movements. They seemed to listen to

7 this and actually didn't actually make any sudden

8 movements at that time.

9 Q. Were you aware of which individuals were being covered

10 by your colleagues?

11 A. Yes. My colleague AY14 was covering the subject with

12 the blue top, white and red stripes. He has also

13 noticed the IEDs strapped to his chest, and has

14 notified -- I'd say it's probably about the same sort of

15 time we both notified what we'd seen and then we started

16 to withdraw immediately.

17 Q. Were you shouting warnings about the IEDs to your

18 colleagues generally in the area?

19 A. Yes. Yes. Because I feared at the time that we needed

20 to withdraw because at any point they could be detonated

21 or go off.

22 Q. You say you then withdrew. To where did you withdraw?

23 A. We tried to withdraw as far back as we could, but the

24 problem we had was there was members of the public

25 trying to leave the Wheatsheaf pub and I believe a shop

14

1 next door, a restaurant next door called -- at this time

2 I believe it is called Applebees. People were trying to

3 leave and I felt it was safer for them to remain inside

4 the pubs at the rear, especially with pubs having

5 cellars, it was a lot safer than actually even trying to

6 bring them out because at any point if they had

7 detonated it would have killed everyone there, including

8 us and all the members of the public.

9 Q. What was your understanding about the potential blast

10 radius of a bomb vest of that type?

11 A. My understanding, basically I believe we should really

12 be 100 metres plus back, but we couldn't because we had

13 the public -- we were there as their safety, we had to

14 protect them. We couldn't go back any further. If we

15 had, they would have come out and they would have been,

16 you know, in danger of the vests going off and so we had

17 to stay in there so they could actually see us, because

18 I could see people looking out and I was trying to sort

19 of speak to them and shouting to go back in and stay

20 back, as far as they could, back inside the pubs.

21 I believe they were adhering to this and that's the

22 reason why we stayed as close as we did. We knew that

23 if they had gone off, we would have died, but at the

24 same time the most important thing was the public.

25 Q. As you were withdrawing from the positions we see in

15

1 these photographs, were you able to take in the scene

2 a little more and see what was going on near the

3 Wheatsheaf?

4 A. Yes, as I withdrew I could see more clearly the third

5 subject on the left-hand side. He was by the -- I think

6 it was like a fabric hoarding with the Wheatsheaf and

7 over on the side I could see that he also had, again,

8 various packages strapped to his chest.

9 Q. What I'm now going to do is to play footage from the

10 start of your dashboard camera through the sequence of

11 events that you have described, because you are the

12 first witness from the officers in your vehicle, and it

13 will show the scene as you approached and a little of

14 the atmosphere. So could we have {AV0006} from the

15 start, please, Oli.

16 (Video played)

17 If we could pause when we get the image on the

18 screen.

19 Now, just to orientate ourselves, the view is up

20 Southwark Street. Stoney Street will be to our left;

21 correct?

22 A. Yes, that's correct.

23 Q. The screen time is 3 seconds behind real time, so it's

24 22.16.47, which is just a few seconds before the first

25 shots are fired in Stoney Street at 22.16.50 and we will

16

1 see your vehicle approach and turn into Stoney Street  
 2 and then we'll pause. So play on, please.  
 3 (Video played)  
 4 And pause there. Now, so we saw a little of the  
 5 nature of the scene with people running around outside  
 6 Stoney Street and they were among the people you  
 7 described shouting, were they?  
 8 A. Yes. Unfortunately with that you can't really see it as  
 9 clear with the dashcam, but to the left there was a lot  
 10 more -- by the pub on the corner there was running and  
 11 sprinting out on the street.  
 12 Q. Now, we'll see after we play on your vehicle coming  
 13 further up Stoney Street. We see the fruit and veg  
 14 shuttered shop over on the right just beyond the yellow  
 15 cross hatchings. We will see a City of London armed  
 16 response vehicle right at the far end, and we'll see the  
 17 armed officers, BX44, BX45 and BX46 in the road covering  
 18 the subjects, now just 13 seconds after they started  
 19 discharging their firearms. Play on, please.  
 20 (Video played)  
 21 Pause there. Can we see that you and your  
 22 colleagues have started to get out of the armed response  
 23 vehicle and covering the subjects?  
 24 A. Yes, that's correct.  
 25 Q. Now, in the seconds that follow, we'll see you and your

17

1 colleagues starting to withdraw after you've noticed the  
 2 apparent IEDs. Play on, please.  
 3 (Video played)  
 4 And if we pause there. Now, if we keep that image  
 5 on screen for the next questions, what position did you  
 6 withdraw to?  
 7 A. At first we withdrew, we were slightly in front of the  
 8 vehicle to the nearside.  
 9 Q. So the left-hand side from the perspective of this  
 10 image?  
 11 A. Yes, sorry, to the left-hand side, apologies. We sort  
 12 of held there for a while. It probably was only  
 13 seconds, but it felt a lot longer in the time. We've  
 14 then -- as we've drew in a little bit further  
 15 we realised we couldn't go too far so we've used the  
 16 best form of cover we had and that was the vehicle,  
 17 especially with the IEDs concerned and you know, being  
 18 detonated, that was about as best protection we could  
 19 actually have in the situation with the members of the  
 20 public still there and people trying to actually run  
 21 through the street.  
 22 Q. If we play on for another 30 seconds or so, please.  
 23 (Video played)  
 24 We see an unarmed officer, PC Rae, checking the  
 25 suspects before moving away from them; do you remember

18

1 that?  
 2 A. Yes, I do. I was very concerned when the officer was  
 3 running across. I -- at that time I was so focused on  
 4 the subject with the -- or the two subjects on the  
 5 right-hand side I don't know where actually he came from  
 6 until seeing the CCTV, but I was concerned that at any  
 7 point the IEDs could be detonated. I was shouting and  
 8 screaming at him to move away, to get away from the  
 9 scene as quickly as possible.  
 10 At first he didn't appear to be listening because he  
 11 just carried on walking across the road and even went  
 12 over to touch the subject.  
 13 Q. As we've seen in the seconds that have just passed, he  
 14 did respond to those instructions?  
 15 A. He did, yes, finally.  
 16 Q. We can take that off screen now and can we please put on  
 17 screen a image, {DC7181/293}. Can we see on the still  
 18 image on the screen now the position to which you  
 19 withdrew while PC Rae was moving across the road just  
 20 over to the left-hand side of the armed response  
 21 vehicle?  
 22 A. Yes. That's myself on the left of the yellow circle.  
 23 Q. Did you make a decision with your colleagues about which  
 24 of you should cover which subject?  
 25 A. Yes. We were talking -- at first I was covering the two

19

1 on the right-hand side as my colleague next to me, E122,  
 2 only had his Glock, so I believe with my carbine I had  
 3 a better -- better to cover with both. I believed he  
 4 was going to go and get his carbine so we could have  
 5 both our primary weapons.  
 6 We then decided, as seconds have gone by, who was  
 7 covering who. I was informed that someone else had the  
 8 subject in the black top covered, so I carried on  
 9 focusing on the subject with the blue top with the red  
 10 and white stripes.  
 11 Q. Were you saying or doing anything while you were  
 12 covering the suspect?  
 13 A. I was making him aware who we were. I was describing  
 14 him so he could hear my voice. Even in that situation  
 15 we were quite controlled, all of us. We were waiting  
 16 for each other to finish before we gave out our oral  
 17 warnings. We were sort of making each subject aware  
 18 where we were, who we were and who we were actually  
 19 speaking to.  
 20 Q. What sort of words were you saying? I appreciate you  
 21 may not be able to remember the precise words.  
 22 A. I can't remember the precise -- but I was telling him --  
 23 I was describing him, the subject with the blue top,  
 24 white and red stripes, "Do not move, don't make any  
 25 sudden movements, keep your hands where they are".

20

1 I could see he was breathing. I could see there were  
 2 slight movements from his legs, but there was no sudden  
 3 or overt movements being made at that time.  
 4 Q. So even knowing he was alive and he had a bomb vest, you  
 5 were still giving him those instructions and covering  
 6 him rather than using any force at that point?  
 7 A. Yes, I was still covering him at that time. You know,  
 8 there was no overt movement, there was no immediate  
 9 threat at that time to us. Yes, they could have been --  
 10 still gone off, detonated, but at the time he was not  
 11 making any overt movements.  
 12 Q. And, is this right, you are trained to respond to  
 13 threat?  
 14 A. Yes.  
 15 Q. As you were there, did you notice any further movements  
 16 of other officers in your peripheral vision?  
 17 A. I've -- I believe my officers, it was AY14, has moved --  
 18 was to my left and was moving. I was making him aware  
 19 of the third subject. I believe he was already aware of  
 20 this and was trying to get cover on that third subject  
 21 by the Wheatsheaf.  
 22 Q. Shortly afterwards did you become aware of another  
 23 colleague, BY5?  
 24 A. Yes. BY5 was actually coming down -- to the right  
 25 there's an opening, just where E59 is. That's actually

21

1 a walk through the actual Borough Market. I could see  
 2 him searching, coming down that pathway. I have shouted  
 3 as quickly as I could, as soon as I've noticed him, to  
 4 go back as there was someone with an IED literally  
 5 laying not far from actually where he approached, and  
 6 I've told him to go along and to get some containment on  
 7 the other side of the street.  
 8 Q. We've heard from him, we know he did that.  
 9 A. Yes.  
 10 Q. Did you actually see where he went?  
 11 A. I didn't see exactly, but I could see people containing  
 12 on the other side of the road. I couldn't actually make  
 13 out exactly who was who on the other side, but I could  
 14 see that there was a containment in on the three  
 15 subjects we had.  
 16 Q. Did you remain in approximately that position we see on  
 17 the screen on the left-hand side of the armed response  
 18 vehicle for some minutes?  
 19 A. Yes, I've actually moved closer in towards the door arch  
 20 of the -- and was near enough over the bonnet of the  
 21 armed response vehicle.  
 22 Q. Still, broadly speaking --  
 23 A. Yes, yes.  
 24 Q. -- at the nearside front corner area?  
 25 A. Yes, that's correct.

22

1 Q. Did you feel you had very good cover?  
 2 A. No. From an IED, I knew I was within the blast radius,  
 3 so I didn't feel I had the best cover, but it was all we  
 4 had and, again, it was due to people being within the  
 5 pub and the shops. I felt if we moved and we all felt  
 6 if we moved they would have come out and we would have  
 7 endangered many lives.  
 8 Q. Did you appreciate that if any of those IEDs, as you  
 9 understood them to be, was detonated, that would pose  
 10 a risk to all those officers we see in their various  
 11 positions on screen now?  
 12 A. Yes. I knew that was the situation we were in, but at  
 13 the same time it was protecting the members of the  
 14 public and keeping the subjects contained was what we  
 15 had to do and that was part of our job.  
 16 Q. As you were there and covering the man in the striped  
 17 top, did a time come when he made a movement that caused  
 18 you some concern?  
 19 A. Yes. Where he's laying on his right-hand side, he then  
 20 made a sudden movement where he has brought his -- sort  
 21 of lifted up and brought his right arm round to the  
 22 back. On -- I could see clearly at that time  
 23 beforehand, anyway, that there was a strap and a couple  
 24 of cords, they were very distinctive, they sort of stood  
 25 out clearly. They weren't just wires, they were

23

1 actually like a cord, like a pull cord.  
 2 I, at that time, believed that he was attempting to  
 3 detonate the IEDs so I have fired, as I believed it was  
 4 an imminent -- an immediate threat to my life, my  
 5 colleagues' and the members of the public.  
 6 Q. How many shots did you fire at first in that initial  
 7 moment?  
 8 A. I fired one first. I then reassessed very quickly, as  
 9 he was still moving, so I fired a second one, a second  
 10 shot.  
 11 Q. Were these aimed shots?  
 12 A. Yes, they were aimed shots. I had my EOTech aim on my  
 13 G36 and I was looking straight down that at him, I was  
 14 very focused on him particularly as I knew all the other  
 15 subjects were being covered by other officers.  
 16 Q. We've heard about the EOTech from other officers. It's  
 17 a sight which gives considerable magnification; is that  
 18 right?  
 19 A. Yes, it does.  
 20 Q. As you were looking down the EOTech sight, which part of  
 21 his body were you aiming at?  
 22 A. I was aiming for centre body mass. Yes, there was  
 23 concern about the IEDs, but this was to his back, sort  
 24 of like his top of his shoulders and below I was aiming  
 25 for.

24

1 Q. After those two initial shots, what did you see next?  
 2 A. After -- he continued to move, so I've taken a third  
 3 shot, aimed this time at his head.  
 4 Q. What was the nature of the further movement which you  
 5 saw him make after the first two shots?  
 6 A. He was trying to still tug or try to get hold of this  
 7 cord and I believed I had to aim for his head to stop  
 8 him or incapacitate him from carrying out this act and  
 9 detonating the IED.  
 10 Q. So was the third shot aimed towards his head?  
 11 A. Yes, it was.  
 12 Q. Did these shots strike their target, as far as you could  
 13 tell?  
 14 A. Yes. I could see slight movement after each shot, but  
 15 he was continuing until the final third shot where there  
 16 was no more movement and I believed the threat had  
 17 ended.  
 18 Q. Were you aware of any other shots being fired at around  
 19 the same time by any other officers?  
 20 A. Yes, I was aware of other officers to my left, AY14 and  
 21 E122 I believe had fired shots. I was also aware of the  
 22 other officer E59 had fired shots to my right as well.  
 23 Q. Now if we can look at these events on two sections of  
 24 footage, please. First of all, can we have {AV0005},  
 25 and may we go to tape counter 37.08.

25

1 If we focus on the figure marked RR in the striped  
 2 top, we can see his legs starting to make some  
 3 movements.  
 4 (Video played)  
 5 That was at 22.22.35 to 22.22.40. We'll start to  
 6 see some arm movements now at 22.23.00, and we saw shots  
 7 being fired towards him at that point.  
 8 Was that the period when you saw movement of his  
 9 body and fired at that stage from your position to the  
 10 left-hand side of the vehicle?  
 11 A. Yes, that's correct.  
 12 MR HOUGH: Sir, I don't know if it would assist to watch  
 13 that again?  
 14 THE CHIEF CORONER: I think -- I mean, it's not the clearest  
 15 of videos.  
 16 MR HOUGH: We're going to look at it again on the dashcam  
 17 footage but this is the footage that actually shows the  
 18 officer in his position as well.  
 19 THE CHIEF CORONER: As I say, it's not the clearest, I don't  
 20 think. We'll pass on it for the moment and perhaps see  
 21 the dashcam footage and come back to this if we need to.  
 22 MR HOUGH: Yes. If we can then go to the dashcam footage at  
 23 {AV0006}, please, and at tape counter 05.40.  
 24 Now, pause here. If we look at the screen time.  
 25 The screen time is 3 seconds behind real time, and the

26

1 screen time from 22.22.32, we'll start to see some leg  
 2 movements, and there are some more leg movements at  
 3 22.22.50, and then arm movements from 22.23.12, and the  
 4 shots being fired at 22.23.23. So if we play on,  
 5 please.  
 6 (Video played)  
 7 The leg movements will start in a second. Then  
 8 further leg movements. There's no shots fired in  
 9 response to the leg movements.  
 10 A. No.  
 11 Q. And then in a couple of seconds we'll see the arm  
 12 movements begin. Further arm movements now and then  
 13 shots fired. Pause there.  
 14 So you would have been over to the left of the image  
 15 in the position we saw on the other footage?  
 16 A. Yes.  
 17 Q. Although you described three shots in sequence, based on  
 18 the footage it appears that they were fired in very  
 19 quick sequence?  
 20 A. Yes. I -- honestly at that time I believed I assessed  
 21 he was still moving and I believe I needed to fire  
 22 another shot at that time. So yes, it does look very  
 23 quickly after each other, but as there was still  
 24 movements I didn't have time to sit there and wait,  
 25 I had to fire again. If not, it would have been

27

1 detonated.  
 2 Q. Yes. We can take that footage off screen now.  
 3 After a further time of covering the suspects, did  
 4 you and your colleagues withdraw from your positions?  
 5 A. Yes, that's correct.  
 6 Q. And shortly thereafter, very shortly thereafter, were  
 7 you relieved by other colleagues?  
 8 A. We were.  
 9 Q. Where did you go from there?  
 10 A. First we went -- it was round the corner, we were held  
 11 because with everything still going on it was believed  
 12 there was possibly someone still outstanding at that  
 13 time. I know this wasn't the case, as it later  
 14 unfolded, but at that time so we were held. We were  
 15 given a conferring warning by D4, I believe it was at  
 16 that time, but we were still watching what was going on  
 17 because there was still people moving around, coming  
 18 round -- you know, there was a lot of police officers  
 19 but there was still members of the public coming out of  
 20 buildings at the time.  
 21 We were held, I believe it was on Southwark Street,  
 22 just round the corner from Stoney Street.  
 23 Q. Did you also provide some information to D4 to assist  
 24 ordnance disposal officers?  
 25 A. Yes, we were asked about what we had seen. We all sort

28

1 of described the silver and white packets or packages  
 2 attached. We said about the various wires also around  
 3 both -- or all three subjects. This was passed on. We  
 4 didn't actually speak to the explosives experts at that  
 5 time, it was passed on by D4 on to them, so I didn't see  
 6 them personally or hand that over to them personally.  
 7 Q. But is it right to say that up to this point everybody  
 8 in the area discussing this believed the IEDs to be  
 9 real?  
 10 A. Yes. We still believed at that time, I was just sitting  
 11 around -- standing around the corner that at any time  
 12 they could go off. You know, we were still concerned  
 13 about how far we were from everything, but at the same  
 14 time we were safe but we were still concerned about our  
 15 colleagues who had taken over from us in the positions  
 16 we were in.  
 17 Q. After a time there were you taken to an area near the  
 18 Bunch of Grapes pub where the forward control point had  
 19 been set up?  
 20 A. Yes, we were held in a holding area. People were  
 21 delegated to then take us to -- once they got vehicles,  
 22 as there was a shortage of vehicles at the time as well  
 23 with everything going on with further reports coming of  
 24 possible other attacks in other areas at that time, so  
 25 we were held and waited until a vehicle was available

29

1 for us to be taken to a PIP suite.  
 2 Q. That's a post-incident procedure suite?  
 3 A. Yes, that's correct.  
 4 Q. Is that a procedure whereby you give your account and  
 5 appropriate welfare arrangements are made?  
 6 A. Yes, that's where we give our initial account of what's  
 7 gone on and then various other things, and welfare  
 8 checks as well are carried out.  
 9 Q. After the incident was there a count-back of ammunition  
 10 to determine how many rounds had been discharged from  
 11 your primary weapon?  
 12 A. Yes, there was.  
 13 Q. How many had been discharged?  
 14 A. Two.  
 15 Q. So although you recalled firing three shots, I think?  
 16 A. Yes, that's correct.  
 17 Q. The evidence afterwards established that you had only  
 18 fired two?  
 19 A. Yes, that's correct.  
 20 MR HOUGH: Thank you very much. Those are all my questions.  
 21 I'll just check whether others have any further  
 22 questions.  
 23 No, those are all the questions we have for you.  
 24 Thank you very much for your evidence. Thank you also  
 25 for all your efforts that evening.

30

1 A. Thank you.  
 2 THE CHIEF CORONER: Thank you very much indeed, officer.  
 3 A. Thank you, sir.  
 4 MR HOUGH: Sir, I am in your hands as to when we take the  
 5 mid-morning break.  
 6 THE CHIEF CORONER: Yes.  
 7 MR HOUGH: There is another officer whose evidence will be  
 8 slightly shorter than the last witness.  
 9 THE CHIEF CORONER: Yes.  
 10 MR HOUGH: But it is of course up to you whether you wish to  
 11 take a break during or after or before his evidence.  
 12 THE CHIEF CORONER: I think we'll carry on for the moment  
 13 and then we'll probably take a break mid-way through,  
 14 Mr Hough. We'll break at 11.30.  
 15 MR HOUGH: Yes. AY14, please.  
 16 AY14 (sworn)  
 17 THE CHIEF CORONER: Good morning. Do please take a seat and  
 18 if you pull the microphone in front of you, towards you,  
 19 that will help amplify your voice. I'm sorry  
 20 I'm slightly hidden by the screen here, but don't worry.  
 21 Thank you.  
 22 Questions by MR HOUGH QC  
 23 MR HOUGH: Can you confirm that you are an officer of the  
 24 Metropolitan Police Service being known as AY14 in these  
 25 Inquests?

31

1 A. I am, yes.  
 2 Q. You understand you're here to give your evidence about  
 3 the part you played in responding to the Borough Market  
 4 terror attack on Saturday, 3 June 2017?  
 5 A. Yes.  
 6 Q. Your witness statements also were made on 4 and 7 June  
 7 and you may refer to those as you wish.  
 8 Are you also a police constable in the  
 9 Metropolitan Police?  
 10 A. I am.  
 11 Q. Did you join the police service in 1994?  
 12 A. I did.  
 13 Q. Did you become a firearms officer in 1998?  
 14 A. Yes, that's right.  
 15 Q. And later, I think, a firearms instructor?  
 16 A. Yes.  
 17 Q. Did you begin working as an armed response vehicle  
 18 officer shortly before the incident we're concerned  
 19 with?  
 20 A. Yes.  
 21 Q. On that Saturday, were you on duty based in Lambeth?  
 22 A. I was, yes.  
 23 Q. What were the weapons which had been issued to you for  
 24 that shift?  
 25 A. An X26 taser, my Glock SLP and a Sig MCX.

32

1 Q. And the Sig MCX is a carbine?  
 2 A. A carbine, yes.  
 3 Q. Were you crewed for that shift with BY28, from whom  
 4 we've just heard, and E122, from whom we'll hear next?  
 5 A. I was, yes.  
 6 Q. Was E122 the driver?  
 7 A. Yes.  
 8 Q. Which seat were you in for that shift?  
 9 A. I was the operator seat.  
 10 Q. So the front passenger?  
 11 A. Front passenger, yes.  
 12 Q. Did you have a relatively unremarkable shift and then  
 13 return to your Lambeth base?  
 14 A. Yes, that's correct.  
 15 Q. Were you in the process of removing kit from your  
 16 vehicle when you heard some calls over the radio?  
 17 A. Yes.  
 18 Q. What did those calls say, so far as you can remember  
 19 now?  
 20 A. To the best of my recollection it was a request for ARVs  
 21 to make their way to the London Bridge area.  
 22 Q. Did the calls say what had happened there?  
 23 A. No, not at that point.  
 24 Q. Did you and your colleagues then head to the scene?  
 25 A. Yes, we did.

33

1 Q. We've heard that you headed on blue lights and sirens  
 2 and that the journey took a small number of minutes?  
 3 A. Yes, that's correct.  
 4 Q. While you were en route in the operator's seat, did you  
 5 get further reports over the radio?  
 6 A. Yes.  
 7 Q. What did they say?  
 8 A. As the operator I listen to City Ops 1, and en route to  
 9 the job it was declared as a Plato incident.  
 10 Q. How close were you to the scene when you heard that it  
 11 was an Operation Plato incident?  
 12 A. I was just by Blackfriars Bridge.  
 13 Q. So quite close to the scene?  
 14 A. Yes.  
 15 Q. What went through your mind when you heard that  
 16 an Operation Plato declaration had been made?  
 17 A. It's one of those words you hear on the radio that you  
 18 never expect to hear. You train for it but never  
 19 actually expect to hear it in a live scenario.  
 20 Q. So you train for marauding terrorist attacks, signified  
 21 by Operation Plato, but you never think that you'll  
 22 actually be bearing down on one?  
 23 A. That's correct, yes.  
 24 Q. Were you still heading for the London Bridge area  
 25 throughout your journey?

34

1 A. Yes, we were.  
 2 Q. On your approach, did you have your primary weapon, or  
 3 were you given your primary weapon?  
 4 A. Yes, en route I was handed my primary weapon, the Sig  
 5 MCX.  
 6 Q. We've heard that your vehicle approached the  
 7 Borough Market area up Southwark Street?  
 8 A. Yes.  
 9 Q. As you approached that area, what did you see and hear  
 10 around you?  
 11 A. Lots of people running away from the Borough Market  
 12 area. Some of them were police officers. There  
 13 appeared to be quite a lot of panic, a lot of distressed  
 14 people. Some people covered in blood.  
 15 Q. Did you still believe that London Bridge was the  
 16 position you needed to get to?  
 17 A. Yes.  
 18 Q. However, as you approached the junction with  
 19 Stoney Street on the left, did you see anything to  
 20 change your mind about that?  
 21 A. Yes. The driver pointed up Stoney Street. I looked up  
 22 and could see other armed officers pointing weapons.  
 23 Q. And as that was happening did your driver turn into  
 24 Stoney Street?  
 25 A. Yes, he did.

35

1 Q. If we can put on screen our photograph of the view into  
 2 Stoney Street, {PH0421/1}. As you turned in, you said  
 3 you saw other firearms officers with their weapons:  
 4 where were they?  
 5 A. In Stoney Street by the Wheatsheaf pub area.  
 6 Q. So that's near where we see the barriers in the middle  
 7 of the road surrounding, I think, an outside seating and  
 8 smoking area?  
 9 A. Yes.  
 10 Q. Did your armed response vehicle come to a halt?  
 11 A. It did, yes.  
 12 Q. Where was that?  
 13 A. The vehicle -- where the vehicle is in situ.  
 14 Q. Just in the position where we see the vehicle in this  
 15 photograph.  
 16 Could you see how many colleagues, armed police  
 17 officers, were in the road when you entered?  
 18 A. Yes, there were three.  
 19 Q. Did you get out of the armed response vehicle on your  
 20 passenger side?  
 21 A. I did, yes.  
 22 Q. What did you see as you got out?  
 23 A. I could see there was two males on the floor on the  
 24 right-hand side.  
 25 Q. Where were the officers in relation to them?

36

1 A. I can't remember exactly. I think they were further  
2 down the street.  
3 Q. Once again, if we see -- if we look at some still images  
4 of the scene as you approached, {DC7181/303}, this is  
5 a still from the dashboard camera in your vehicle. Was  
6 this the scene as you approached?  
7 A. Yes, it is.  
8 Q. We can see on this image that one of the armed officers  
9 who was already present was covering the suspects over  
10 on the right. Where did you go as you got out of the  
11 armed vehicle?  
12 A. Over to the right towards where BX44 is.  
13 Q. Did you look at the suspects?  
14 A. I did, yes.  
15 Q. What did you notice about them?  
16 A. They appeared to be wearing what looked like suicide  
17 vests.  
18 Q. Both of them?  
19 A. Both of them, yes.  
20 Q. What did the suicide vests look like?  
21 A. Silver packages and then, like, a brown belt with wires  
22 around their waist.  
23 Q. Was there any doubt in your mind about whether these  
24 were real?  
25 A. No.

37

1 Q. What went through your mind at that point?  
2 A. At that point I honestly thought that that was probably  
3 going to be the last thing I do.  
4 Q. That the people would probably detonate and that you and  
5 all around would be killed?  
6 A. Yes, that's right.  
7 Q. Could you tell whether the people wearing those devices  
8 were alive?  
9 A. Yes, they appeared to still be alive.  
10 Q. Were they moving?  
11 A. Yes, a little bit.  
12 Q. What did you then do or say?  
13 A. I backed away from them and I used my PR to inform other  
14 people not to come straight to the scene.  
15 Q. A PR is personal radio?  
16 A. Personal radio, sorry.  
17 Q. Where did you get to?  
18 A. I went back to our vehicle.  
19 Q. Which side of it?  
20 A. The passenger side, the nearside.  
21 Q. As you moved to that position, did you notice any other  
22 subjects or suspects?  
23 A. Yes, at that point I think I noticed KB by the  
24 Wheatsheaf.  
25 Q. What did you notice of him, what he was wearing, what

38

1 his condition was?  
2 A. He was wearing an Arsenal shirt and also had the silver  
3 packaging strapped to his chest that looked like  
4 a suicide vest.  
5 Q. Was he moving?  
6 A. I don't think he was at that point, no.  
7 Q. As you were standing on the left-hand side of the  
8 vehicle, did you see any unarmed officers moving around?  
9 A. Yes, I did.  
10 Q. What were they doing?  
11 A. They were approaching the subject, indicating that they  
12 were going to handcuff him.  
13 Q. Did you and your colleagues, your armed colleagues, make  
14 any response to that?  
15 A. Yes, we did.  
16 Q. What was the response?  
17 A. For them to back off, go away, get clear of the area.  
18 Q. It may be an obvious question, but why were you shouting  
19 that to them?  
20 A. Because the subjects were wearing what we believed to be  
21 explosive devices and it was for their safety to stay  
22 away from the area.  
23 Q. Can we now look at some of the footage of these events  
24 from the dashcam footage just to identify where you were  
25 and how you moved. Can we go again, please, Oli to

39

1 {AV0006} and play from the start.  
2 So this is the view from the dashboard camera as the  
3 vehicle is approaching up Southwark Street and it will  
4 turn into Stoney Street on the left. Play on, please.  
5 (Video played)  
6 Pause there. We've now reached the scene that we  
7 saw in the still image a few moments ago. Your vehicle  
8 had come up close to where the two subjects were and the  
9 armed police officers from the City of London Police  
10 were directly in front. I think we'll see, if we focus  
11 on the left-hand side of the screen, you get out of the  
12 passenger side and move over towards those subjects.  
13 Play on, please.  
14 (Video played)  
15 You have just come into view. Pause there.  
16 You appear first of all to approach and cover with  
17 your firearm the subject further from the vehicle  
18 wearing the striped top; is that right?  
19 A. That's correct.  
20 Q. We have seen your two colleagues come out of the  
21 right-hand side of the ARV, primarily covering the man  
22 closer, all in black.  
23 A. Yes.  
24 Q. And then in the minutes or the seconds that follow, we  
25 will see all of you withdraw as you have noticed the IED

40

1 vests. Play on, please.  
 2 (Video played)  
 3 Pause there. So did we see in the footage we were  
 4 just looking at, you and your colleagues retreating to  
 5 limited cover behind the armed response vehicle?  
 6 A. Yes.  
 7 Q. Did we also see the officer in the white short sleeved  
 8 shirt and stab vest, PC Rae, moving between the  
 9 attackers before, as you've described, being warned off?  
 10 A. Yes.  
 11 Q. We can take that off screen now.  
 12 If we can put on screen, please, {DC7181/293}. Can  
 13 we see on this image the position to which you initially  
 14 withdrew, marked AY14?  
 15 A. Yes.  
 16 Q. And then on the next page, please {DC7181/294}, further  
 17 images showing you withdrawing further back alongside  
 18 the armed response vehicle closer in to the side of it?  
 19 A. Yes.  
 20 Q. Is that where you positioned yourself to maintain cover  
 21 on the subjects?  
 22 A. Yes.  
 23 Q. While you were in that position, did you see anything  
 24 happening in the area of the Wheatsheaf?  
 25 A. Yes, I could see the third subject in the Arsenal shirt.

41

1 Q. Was the door of the Wheatsheaf closed throughout?  
 2 A. No, someone appeared from that door.  
 3 Q. What did that person do or say?  
 4 A. I think they were calling for help.  
 5 Q. How did you respond?  
 6 A. I told them to go back inside the pub.  
 7 Q. And that was, again, for their safety?  
 8 A. For their safety, yes.  
 9 Q. While you were waiting there did you hear a request from  
 10 another officer to turn off the engine of the armed  
 11 response vehicle?  
 12 A. I did, yes.  
 13 Q. Did you then do that?  
 14 A. I did, yes.  
 15 Q. We have heard that that was one of the officers at the  
 16 rear who wanted the engine turned off because fumes were  
 17 coming into his face.  
 18 A. Yes.  
 19 Q. While you were there, did you agree with your colleagues  
 20 which of the subjects each of you would cover?  
 21 A. Yes, we did.  
 22 Q. Who were you covering?  
 23 A. I was covering the one outside the Wheatsheaf, KB.  
 24 Q. So having initially covered the man over on the right in  
 25 the striped top, Redouane, you were now covering the man

42

1 outside the Wheatsheaf?  
 2 A. Yes, I was.  
 3 Q. While you were covering him, were you saying anything?  
 4 A. Sorry?  
 5 Q. Were you saying anything as you were covering him?  
 6 A. Shouting at him to stay still .  
 7 Q. What sort of words were you using?  
 8 A. "Stay down", "Don't move", "Stay still ".  
 9 Q. Was he moving?  
 10 A. Yes.  
 11 Q. Continuously or just at one particular point in time?  
 12 A. At which point, sorry?  
 13 Q. Well, you said that the man did move: was he making  
 14 movements throughout or was he stationary until  
 15 a particular time when you noticed some movement?  
 16 A. So he was stationary until a particular time, yes.  
 17 Q. Did that time come after a number of minutes?  
 18 A. It did, yes.  
 19 Q. What did you see at that time?  
 20 A. The male appeared to push himself up in a kind of half  
 21 press-up position .  
 22 Q. So you're indicating a movement pushing his upper body  
 23 up with his arms?  
 24 A. Yes, that's right .  
 25 Q. What did you think he was doing?

43

1 A. I thought he was raising himself up to activate his  
 2 device.  
 3 Q. How did you respond?  
 4 A. I opened fire .  
 5 Q. Before you opened fire, did you say anything?  
 6 A. I probably still kept shouting "stay still ".  
 7 Q. In your statement, you describe having shouted  
 8 repeatedly for him to stay still and stay down.  
 9 A. Yes, that's correct .  
 10 Q. What you say is:  
 11 "He appeared to be pushing himself up from the  
 12 floor. I shouted repeatedly for him to stay still and  
 13 stay down."  
 14 Now, that was a statement you made very close to the  
 15 time after just a few days when presumably your memory  
 16 was a little fresher?  
 17 A. Yes.  
 18 Q. So do you think you did shout warning shouts of that  
 19 kind?  
 20 A. Yes.  
 21 Q. You say you opened fire. Which part of his body did you  
 22 aim at?  
 23 A. His torso .  
 24 Q. Any particular part of his torso?  
 25 A. Centre mass.

44

1 Q. Why did you aim there?  
 2 A. That's where you're trained to aim.  
 3 Q. To incapacitate?  
 4 A. To incapacitate.  
 5 Q. Did you take individual shots or multiple shots at that  
 6 first stage?  
 7 A. I fired individual shots.  
 8 Q. Did the first shot appear to have any effect on him and  
 9 his movement?  
 10 A. No, it appeared to have no effect.  
 11 Q. What did you then do?  
 12 A. So I reassessed and fired a second shot.  
 13 Q. Where was that aimed?  
 14 A. To the torso, centre mass.  
 15 Q. Now in your statement you say that after the second shot  
 16 didn't appear to have an effect you altered your aim and  
 17 fired at his head?  
 18 A. Yes, that's right.  
 19 Q. Again, looking back to your witness statement made  
 20 closer to the time, is that likely to be right?  
 21 A. Yes.  
 22 Q. Any particular reason you would now aim at the head?  
 23 A. It's for a critical shot.  
 24 Q. And is a critical shot appropriate particularly for  
 25 a person wearing a device of this kind?

45

1 A. Yes.  
 2 Q. Again, it may be very obvious to you with all your  
 3 training, but why is that?  
 4 A. To incapacitate the subject.  
 5 Q. To make sure that the subject doesn't have any time at  
 6 all to activate the device?  
 7 A. Yes.  
 8 Q. Did that shot have an effect?  
 9 A. Yes.  
 10 Q. What was the effect?  
 11 A. The male slumped to the floor, motionless.  
 12 Q. Did you maintain cover over him?  
 13 A. Yes.  
 14 Q. Did you see any further movement from him?  
 15 A. No.  
 16 Q. After a couple of minutes, were you then relieved by  
 17 other officers in your position?  
 18 A. Yes, I was.  
 19 Q. May we briefly look at some footage of these events, at  
 20 {AV0005}, please. If we can have, please, tape counter  
 21 37.30.  
 22 Pause here, please. The time is 22.22.52, which is  
 23 23 seconds behind real time, and you are one of the  
 24 officers positioned over on the left-hand side of the  
 25 vehicle covering the figure of Khuram Butt near the

46

1 barriers of the Wheatsheaf up ahead and to your left?  
 2 A. Yes.  
 3 Q. We will see from screen time 22.23.25 some faint  
 4 movements from his position. So if we play on, please.  
 5 (Video played)  
 6 We see some very faint movements from his position.  
 7 We will see this more clearly in some dashcam footage.  
 8 Just while we have this on screen, can we skip forward,  
 9 please, to tape counter 40.00, please.  
 10 If we play on, we'll see that you and your  
 11 colleagues are relieved at this time, 10.25. Play on,  
 12 please.  
 13 (Video played)  
 14 And pause there. So we saw that you kept cover on  
 15 the subject from about 10.17, 10.18, until about 10.25.  
 16 During that period, a couple of minutes before the end,  
 17 there was movement we saw from Khuram Butt and we'll see  
 18 that more clearly on the dashboard footage, but that's  
 19 the point I think in the sequence that you fired?  
 20 A. Yes.  
 21 Q. Can we look at the dashboard footage, please, {AV0006}  
 22 at tape counter 6.55. Now if we focus on the figure of  
 23 Khuram Butt near the Wheatsheaf barriers, the screen  
 24 time at the moment is 22.23.29, 3 seconds behind real  
 25 time. At 22.23.52, we'll see movements from Khuram Butt

47

1 which is the time at which there was faint signs of  
 2 firing from your weapon on the other footage. Play on,  
 3 please.  
 4 (Video played)  
 5 Just a second. Stop there, please.  
 6 So I don't know if you would like to see that again.  
 7 It was a sign of Khuram Butt's body moving up.  
 8 THE CHIEF CORONER: Yes, I think we'll just watch that one  
 9 more time.  
 10 MR HOUGH: If we can go back, please. Yes, play on, please.  
 11 (Video played)  
 12 22.23.52 on screen. Focusing on Khuram Butt.  
 13 So they were quite clear and distinctive movements  
 14 which prompted you to fire?  
 15 A. Yes.  
 16 Q. We can take that off the screen now.  
 17 After you had been relieved, as we saw in the  
 18 earlier footage, where did you move to?  
 19 A. On to the main road just around the corner.  
 20 Q. So Southwark Street near the tube station?  
 21 A. Yes.  
 22 Q. While there, did you give information to a colleague,  
 23 D4, to assist explosives officers?  
 24 A. Yes, I did.  
 25 Q. Were you, along with your other colleagues, moved from

48

1 that position to the Bunch of Grapes pub where control  
 2 for the operation was being set up?  
 3 A. Yes, I was.  
 4 Q. After a short further time there, were you sent to Leman  
 5 Street, a police station, for a post-incident procedure,  
 6 during which you could give your account?  
 7 A. Yes, I was.  
 8 Q. As part of that procedure, did a count-back of  
 9 ammunition take place to determine the number of rounds  
 10 that had been discharged from your weapons?  
 11 A. Yes.  
 12 Q. How many rounds had been discharged?  
 13 A. Three.  
 14 Q. That was from your primary weapon?  
 15 A. Yes.  
 16 Q. And none from your secondary weapon?  
 17 A. None.  
 18 Q. And so far as you are able to tell us, all of those  
 19 rounds were fired during that single engagement with  
 20 Khuram Butt at that time we saw on screen?  
 21 A. Yes, they were.  
 22 MR HOUGH: Thank you very much. Those are all my questions.  
 23 I don't know if others have any questions for you.  
 24 No, it appears not. Thank you very much for your  
 25 evidence and for all your efforts on that night.

49

1 THE CHIEF CORONER: Thank you very much indeed, officer.  
 2 Thank you.  
 3 Mr Hough, I think we will take our break there.  
 4 Members of the jury, we will have our mid-morning  
 5 break there, thank you.  
 6 (11.32 am)  
 7 (A short break)  
 8 (11.51 am)  
 9 THE CHIEF CORONER: Mr Moss, it's E122, is it, next?  
 10 MR MOSS: Sir, yes, and then AY37.  
 11 (In the presence of the jury)  
 12 MR MOSS: E122.  
 13 E122 (sworn)  
 14 THE CHIEF CORONER: Good morning, officer. Please do take  
 15 a seat because the microphone will help amplify your  
 16 voice.  
 17 A. Thank you, sir.  
 18 THE CHIEF CORONER: Thank you.  
 19 Questions by MR MOSS  
 20 MR MOSS: Officer, you are a constable in the Metropolitan  
 21 Police Service?  
 22 A. Yes, sir.  
 23 Q. And you're being known in these Inquests as E122?  
 24 A. Yes.  
 25 Q. And you appreciate, of course, that you are here to give

50

1 evidence about what it was that you did and what you saw  
 2 and what you heard on 3 June 2017?  
 3 A. Yes.  
 4 Q. You made two witness statements, I think you have them  
 5 with you there, and if you need to refer to them, then  
 6 you, of course, may do so.  
 7 A. Thank you.  
 8 Q. You've been in the Metropolitan Police Service, is this  
 9 right, since June 2005?  
 10 A. That's correct.  
 11 Q. You completed your firearms training in April 2012 and  
 12 you moved straight to the armed response vehicles?  
 13 A. That's correct.  
 14 Q. And you're also a trained firearms medic?  
 15 A. Yes, sir.  
 16 Q. On 3 June you were the driver of an ARV, an armed  
 17 response vehicle, and I think your call sign was TJ211?  
 18 A. That is correct, yes.  
 19 Q. Is it right also that you were crewed with two officers,  
 20 AY14 and BY28, both of whom you know gave evidence this  
 21 morning?  
 22 A. Yes, sir.  
 23 Q. You started your shift, did you, at 3.00 pm?  
 24 A. That's correct, yes.  
 25 Q. What personal protective equipment did you carry on that

51

1 shift?  
 2 A. In relation to the firearms I was carrying?  
 3 Q. What did you personally have?  
 4 A. A Glock 17 self loading pistol with 34 rounds, which is  
 5 usual practice, which is in what we call condition 1, so  
 6 it's one round in the breech, ready to fire, and I also  
 7 had on my body armour an X26 -- with two cartridges, a  
 8 taser.  
 9 Q. We've heard from other officers that they had a Glock 17  
 10 as their secondary weapon and that they also had  
 11 a primary weapon and they've talked about two different  
 12 types of carbine, but you don't talk about one of those  
 13 in your witness statement?  
 14 A. No, sir, so my carbine, my MCX, would be in the safe in  
 15 the rear of the armed response vehicle because as driver  
 16 it's common practice to do so.  
 17 Q. And is it right, in fact, that your carbine stayed in  
 18 the safe throughout the whole incident?  
 19 A. That's correct.  
 20 Q. And so when you are out of your vehicle, as you will be,  
 21 and we'll get to that part of the narrative, you have  
 22 with you your Glock 17 pistol and your taser but no  
 23 other firearm?  
 24 A. That's correct.  
 25 Q. Were you wearing body-worn video?

52

1 A. I was not, sir, no.  
 2 Q. What's the reason for that?  
 3 A. Because it was towards the end of my shift, our  
 4 body-worn video -- my body-worn video was in a docking  
 5 station in our ARV base.  
 6 Q. There are some officers from whom we've heard to whom  
 7 BWV hadn't been issued, but you weren't one of those:  
 8 you did have a camera and you just didn't have it with  
 9 you at this time?  
 10 A. That is correct, yes.  
 11 Q. Around 10.00 pm, shortly after 10.00 pm on 3 June, is it  
 12 right that you were at your base in the Lambeth area?  
 13 A. That is correct.  
 14 Q. And a call came out on the radio which alerted you to  
 15 something going on at London Bridge?  
 16 A. That's correct sir, yes.  
 17 Q. And I think you heard that on the SCO19 hailing group?  
 18 A. Yes.  
 19 Q. In your statement you say it was a quickly developing  
 20 incident; why do you say that?  
 21 A. The information, the intelligence that was coming in,  
 22 primarily to the SCO19 pod at Lambeth was obviously  
 23 coming in and had to be assessed and was developing very  
 24 quickly due to the amounts of calls.  
 25 Q. Do you remember what you did hear on the radio?

53

1 A. They wanted ARVs to run towards London Bridge in light  
 2 of what had happened recently.  
 3 Q. Does "run" mean something specific?  
 4 A. So leave the base and make our way to that location.  
 5 Q. On blue lights?  
 6 A. Yes.  
 7 Q. And so what did you do?  
 8 A. So the three of us got in our car, got in our armed  
 9 response vehicle, and left our base and made our way  
 10 towards the London Bridge area.  
 11 Q. As the driver, what was your priority whilst you were  
 12 travelling?  
 13 A. So my primary aim in that sense was to get our car  
 14 safely from A to B so we can deploy effectively.  
 15 Q. And there's more information coming out on the radio,  
 16 presumably, this whole time?  
 17 A. Yes, sir.  
 18 Q. Were you listening to all of that?  
 19 A. I'm aware of it, but I wouldn't say I was directly  
 20 listening to it because my priority as driver was  
 21 getting to the location. But I did have, for example,  
 22 my earpiece in, so I was getting updates from the SCO19  
 23 pod.  
 24 Q. Were there any particular updates that you remember?  
 25 Any of particular importance?

54

1 A. The most pertinent being that it was being declared as  
 2 an Operation Plato incident.  
 3 Q. And what did you understand by Operation Plato? What  
 4 did it mean for it to be declared as such?  
 5 A. So an Operation Plato is the name given to an operation  
 6 where it's a marauding terrorist firearms attack.  
 7 Q. Do you remember where you were when it was declared  
 8 as Operation Plato?  
 9 A. We were travelling along Southwark Street.  
 10 Q. How far away from Stoney Street, where you end up?  
 11 A. It's hard to say, but I would say maybe 2 to 3 minutes  
 12 from there.  
 13 Q. And when it was declared as Operation Plato, what went  
 14 through your mind?  
 15 A. The fact that our tactic in this situation as ARV  
 16 officers is to identify, locate and confront terrorists  
 17 in order for them to be neutralised.  
 18 Q. Is the London Bridge and Borough Market area an area  
 19 that you knew well?  
 20 A. Yes, I did, sir.  
 21 Q. Were you being directed to a specific location?  
 22 A. I can't recall exactly, but I think we were told to head  
 23 towards London Bridge itself.  
 24 Q. What route did you take into the market?  
 25 A. So as we were travelling along Southwark Street towards

55

1 Borough High Street we've turned left at the  
 2 Southwark Tavern and into Stoney Street.  
 3 Q. You're coming from the south, the river and the bridge  
 4 are ahead of you?  
 5 A. Yes.  
 6 Q. And you take a left and you go into Stoney Street?  
 7 A. Yes, sir.  
 8 Q. Where did you stop your car?  
 9 A. So I stopped my car ...  
 10 Q. Near to what?  
 11 A. It was -- there was a subject on the right-hand side and  
 12 I stopped my car 4 to 5 metres, I think it was, on the  
 13 right-hand side.  
 14 Q. Sorry, you said there were the suspects?  
 15 A. The subject was on the right-hand side.  
 16 Q. How many subjects did you see at that time?  
 17 A. So as I've turned into Stoney Street, sir, I've seen a  
 18 firearms officer in the middle of the road, and he was  
 19 pointing his firearm at two subjects on the right-hand  
 20 side, so I've stopped my car on the right-hand side,  
 21 approximately 5 metres, I think it was, sir.  
 22 Q. Was it just one firearms officer that you could see in  
 23 the middle of the road?  
 24 A. I recall just seeing one officer.  
 25 Q. Did you see that subject closely at that time? Did you

56

1 take a good look?  
 2 A. Not at that time, no, sir, no.  
 3 Q. What did you do next?  
 4 A. Stopped our car and then deployed on foot.  
 5 Q. Do you know in what order you got out of the vehicle,  
 6 the three of you?  
 7 A. I would have probably been last, being the driver, and  
 8 the other two would have deployed either side, out of  
 9 the left-hand and the right-hand side.  
 10 Q. When you got out of the vehicle, in which direction did  
 11 you go, relative to the vehicle?  
 12 A. I got out of the vehicle and I moved forward to the  
 13 firearms officer that was covering on the right-hand  
 14 side.  
 15 Q. Did you get in front of the vehicle at that time? How  
 16 far forward did you move?  
 17 A. I moved 2 to 3 metres in front of the vehicle.  
 18 Q. How long did you stay in that position?  
 19 A. A matter of seconds until I realised what we were  
 20 dealing with, what the subjects were -- once  
 21 I identified the subjects on the floor, then we  
 22 withdrew.  
 23 Q. So where did you then move to?  
 24 A. The front nearside, the front left-hand side of our car.  
 25 Q. In your statement you talk about going round the back of

57

1 your car. So is it right that you get out of the  
 2 driver's door, you move forward slightly, did you then  
 3 go around the back to get to the position by the front  
 4 passenger door?  
 5 A. To clarify, in my statement, which was done a few days  
 6 after the incident, I recalled getting out of the car  
 7 and going round the back to the front nearside, and that  
 8 must have been perceptual distortion, because what  
 9 actually -- in reality I've got out the driver's door  
 10 and I've moved forward 2 to 3 metres where I've  
 11 identified the subjects on the floor.  
 12 Q. But did you then move to the area by the front passenger  
 13 door?  
 14 A. Yes. Yes, sir.  
 15 Q. And you say now that you moved across the front of the  
 16 vehicle instead of going round the back.  
 17 A. Yes, yes, sir.  
 18 Q. So when you pull up, you have seen one subject on the  
 19 right-hand side of where your vehicle ends up?  
 20 A. Yes, sir.  
 21 Q. You are talking now about subjects plural when you are  
 22 describing yourself in front of the car?  
 23 A. So as I've gone forward, sir, and I've looked down,  
 24 there are two subjects, but initially I only saw the  
 25 one.

58

1 Q. But these are both on the right-hand side?  
 2 A. Yes.  
 3 Q. How closely did you look at them at that time?  
 4 A. Metres. 1 or 2 metres.  
 5 Q. For how long did you look at them?  
 6 A. A matter of a few seconds, because obviously we  
 7 identified what we thought was IEDs in the front of  
 8 their torsos.  
 9 Q. Were you aware at this time of a third subject?  
 10 A. Not until I withdrew to the front nearside of the  
 11 vehicle, and saw the subjects on the left-hand side.  
 12 Q. Having got out of the vehicle, did you have a weapon in  
 13 your hands?  
 14 A. Yes, so I had my Glock self loading pistol in my hand.  
 15 Q. In what position were you carrying it?  
 16 A. As I've drawn it from my drop leg holster I would have  
 17 pointed it directly at the first subject that I saw with  
 18 the person-borne IED.  
 19 Q. At what point did you see the person-borne IED on that  
 20 first subject?  
 21 A. Pretty much as soon as I got next to him.  
 22 Q. As soon as you were on foot though, not whilst in the  
 23 vehicle?  
 24 A. Yes, exactly, sir. When I was on foot, once I pushed up  
 25 to the first subject then I identified what I believed

59

1 to be the IED across his torso.  
 2 Q. At what point did you identify a similar IED on the  
 3 second subject on the right-hand side?  
 4 A. Pretty much at the same time. I recognised that he also  
 5 had something around his torso.  
 6 Q. What did you think when you saw those IEDs?  
 7 A. I -- I thought they was going to detonate and I feared  
 8 for my life.  
 9 Q. You spoke about one firearms officer who was in front of  
 10 the ARV as you drove into the road. Were you aware of  
 11 other firearms officers once you got out of the car?  
 12 A. Yes, sir.  
 13 Q. What were they doing?  
 14 A. There was approximately four or five firearms officers  
 15 around the subjects on the right-hand side, which was  
 16 the initial area I was concerned with, and putting  
 17 firearms at the subjects on the floor and giving verbal  
 18 commands.  
 19 Q. Could you say what these verbal commands were?  
 20 A. They would have been along the lines of "Show me your  
 21 hands, we're armed police".  
 22 Q. And do you say that because you remember those words  
 23 particularly or because that's the training that you  
 24 get?  
 25 A. That's the training we get; I don't recall exactly what

60

1 was said.  
 2 Q. Did you give verbal commands at this time?  
 3 A. I don't recall at this time, sir, no.  
 4 Q. Were you aware of any firearms officers with this other  
 5 subject on the left-hand side of the road? Presumably  
 6 not because you hadn't yet noticed that he was there?  
 7 A. No, exactly like you say: I didn't know until a couple  
 8 of seconds later once we'd withdrawn.  
 9 Q. Did you see at this time any unarmed officers?  
 10 A. Sorry, sir, when we've withdrawn did I see more  
 11 officers?  
 12 Q. At what time did you first see non-firearms officers,  
 13 unarmed officers?  
 14 A. Once we identified the subject on the left-hand side  
 15 that's when I noticed members of the public and police  
 16 officers on the left-hand side.  
 17 Q. If we could look at a couple of images, we know from the  
 18 dashcam footage from your ARV that you got on scene at  
 19 approximately 22.17. If we look at {DC7248/11}, and if  
 20 we could zoom in on the image, we see labelled by the  
 21 front passenger door an officer with your cypher E122.  
 22 This is taken at 22.17.32, so approximately 30 seconds  
 23 after your vehicle arrived on scene?  
 24 A. Yes, sir.  
 25 Q. Am I right to say it looks like you are crouching at

61

1 that time. You might be able to see it on the iPad in  
 2 front of you more easily.  
 3 A. I mean essentially there I'm trying to get as low  
 4 a profile as possible and using the engine block as best  
 5 cover, best ballistic cover, because obviously I feared  
 6 the IEDs would detonate.  
 7 Q. And if we look at {DC0001/49}, it's an image taken at  
 8 a very similar time. I think we can probably see there  
 9 that you're standing, although it is difficult to tell  
 10 because of the perspective?  
 11 A. Yes, sir, that ...  
 12 Q. Why did you want to be behind the engine block?  
 13 A. I mean, we were quite limited to the amount of cover  
 14 that was given to us in the street. The engine block at  
 15 that point would have been the best cover from the  
 16 subjects on the right-hand side, albeit not from the  
 17 subjects on the left.  
 18 Q. If the explosive devices which you'd seen were to  
 19 detonate, what did you think the likely effect would be?  
 20 A. There would be loss of life.  
 21 Q. If you could have put a cordon in place, how far away  
 22 would you have liked to be?  
 23 A. In a conventional cordon, somewhere in the region of  
 24 100 metres, but that was just not practicable in this  
 25 scenario.

62

1 Q. Did you think about getting proper hard cover?  
 2 A. We had to work with what we had in the street and at  
 3 that time the only hard cover available was the engine  
 4 block of the car.  
 5 Q. At what moment, then, do you become aware of the subject  
 6 on the left-hand side of the road?  
 7 A. I believe there was communication from my colleagues and  
 8 they pointed out the subjects in amongst the signage for  
 9 the Wheatsheaf pub.  
 10 Q. Were any of the suspects moving?  
 11 A. Not at that time, sir, no, not that I recall. They  
 12 appeared to be motionless.  
 13 Q. Did you think that they were dead or alive at that time?  
 14 A. I didn't know if they were dead or alive, sir. They  
 15 appeared motionless. I can't remember any...  
 16 Q. Did there come a time when you did see movement?  
 17 A. Yes, sir.  
 18 Q. At what time was that?  
 19 A. I'm not too sure time-wise from when the vehicle  
 20 stopped, for example, but there came a time when the  
 21 subject on the left began to move.  
 22 Q. Did you see any movement from the two on the right-hand  
 23 side of the road, or was it just the one on the left who  
 24 you see move?  
 25 A. When I saw the movement from the subject on the left,

63

1 I was solely concentrating on the subject on the left,  
 2 so I couldn't have -- I wouldn't have seen any motion  
 3 from the subjects on the right.  
 4 Q. Okay. So let's focus on the time at which you come to  
 5 be by the front passenger door, we'll start there, and  
 6 we're focusing on the time up until when you've seen  
 7 movement with that subject. During that time, are you  
 8 focusing only on the person on the left-hand side of  
 9 the road or are you also looking at the other two  
 10 people?  
 11 A. There comes a point within the time frame that we were  
 12 working to where I switched my concentration from the  
 13 subjects on the right to the subject on the left.  
 14 Q. Are you discussing with your colleagues around you who  
 15 is covering which subjects?  
 16 A. Yes, exactly that, sir, yes, just to ensure that we had  
 17 firearms cover on all subjects.  
 18 Q. And is it agreed then that your responsibility changes  
 19 from those on the right to the one on the left?  
 20 A. Yes, sir.  
 21 Q. When you see the movement of the person on the left, how  
 22 do you react?  
 23 A. So when the subject on the left begins to sit up,  
 24 I believe at any second he is going to detonate his  
 25 device, I feared for my life, sir.

64

1 Q. What did you do?  
 2 A. I fired towards that subject.  
 3 Q. Were you aware of others firing as well?  
 4 A. Yes, sir.  
 5 Q. How much was he moving? You say "Begin to sit up", but  
 6 what parts of his body?  
 7 A. He was initially lying on his back with his IED exposed  
 8 to himself, and as he's sort of coming up towards  
 9 90 degrees, he's effectively sitting up, and that's when  
 10 I've fired my shot, sir.  
 11 Q. How did you assess the threat to you and others?  
 12 A. I assessed it as very high risk and extreme threat, sir.  
 13 I believed that device would have detonated.  
 14 Q. Did you say anything before shooting?  
 15 A. I don't recall exactly what was said. No, sir, I don't  
 16 recall what was said.  
 17 Q. Did you have time in which you could have said  
 18 something?  
 19 A. Not any more than what I would have said already in so  
 20 much trying to get a verbal compliance from all three  
 21 subjects, but I don't recall shouting at the subject  
 22 that was sitting up.  
 23 Q. How much time passed between you seeing the subject  
 24 begin to sit up and you shooting?  
 25 A. 1 or 2 seconds, best guess.

65

1 Q. How many shots did you fire?  
 2 A. I fired three shots.  
 3 Q. Were they three immediate back-to-back shots or were  
 4 there pauses?  
 5 A. There were pauses in between all the shots where  
 6 I reassessed the threat posed.  
 7 Q. What assessment did you reach when pausing and  
 8 reassessing?  
 9 A. So after firing the first shot I paused, reassessed.  
 10 The subject was still moving, I fired a second shot,  
 11 after which he was still moving, I fired my third shot.  
 12 Q. Were they aimed shots?  
 13 A. They were aimed shots and my shot placement was towards  
 14 the centre of the visible mass which was his torso.  
 15 Q. Did you give any consideration when aiming your shot for  
 16 the location of the IED, the position of that?  
 17 A. I did, sir, but limited as to what I could aim for.  
 18 I could only see, effectively, the upper part of the  
 19 torso.  
 20 Q. Why did you not fire more than three shots?  
 21 A. After I'd fired my third shot and reassessed I deemed  
 22 the subject unresponsive, motionless.  
 23 Q. What were other firearms officers doing at this time?  
 24 A. There were several officers around me firing shots as  
 25 well, sir.

66

1 Q. Could you say how many officers were firing?  
 2 A. I couldn't say exactly, no.  
 3 Q. Did other people carry on firing after you did?  
 4 A. I don't recall, sir.  
 5 Q. Did other people start firing before you did?  
 6 A. I can't recall the sequence of shots. I can only recall  
 7 when I fired, but I was aware that other officers were  
 8 firing at the same time.  
 9 Q. After that happened, did any officers carry out first  
 10 aid straightaway?  
 11 A. No. No first aid was given at that point.  
 12 Q. Why not?  
 13 A. We still believed that there was three viable improvised  
 14 explosive devices in that street and it wouldn't have  
 15 been safe to push forward at that moment to do first  
 16 aid, sir.  
 17 Q. What did you do after firing your shots?  
 18 A. So after firing my shots, as I recall, conferred with  
 19 other officers there, made sure they still had firearms  
 20 cover, then I withdrew and updated an officer at the  
 21 rear of the ARV.  
 22 Q. Did you stay at that location for further time?  
 23 A. We were replaced with other ARV officers who then  
 24 executed a plan to move forward. But we, or certainly  
 25 myself and, I believe, three others, moved back, sir.

67

1 Q. And is it right that you and those three others were  
 2 spoken to by a sergeant and you were given a conferring  
 3 warning at that time?  
 4 A. That's correct, sir.  
 5 Q. And is it right that you were taken to the Bunch of  
 6 Grapes public house, which is the forward command point?  
 7 A. Yes, sir.  
 8 Q. And is it right further that you then went to a secure  
 9 location where the post-incident procedure was carried  
 10 out?  
 11 A. That's correct, sir.  
 12 Q. And during that you gave an initial account and you  
 13 later gave the statement that you are referring to now?  
 14 A. Yes, that's correct, sir.  
 15 Q. As part of that procedure, do you recall there being  
 16 a count-back?  
 17 A. I do, sir, yes.  
 18 Q. And is it right that there were 17 rounds in the  
 19 magazine that you had in your pistol and there were 14  
 20 following the incident?  
 21 A. That's correct, sir.  
 22 Q. Three had been fired?  
 23 A. That's correct.  
 24 Q. And as you said at the beginning, the carbine remained  
 25 in your vehicle the entire time but there was a

68

1 count-back there as well and of course, the same number  
 2 of rounds were in it as there always were?  
 3 A. Yes, sir.  
 4 Q. Looking at another image, if we can go to {DC7248/17},  
 5 you will see that you are the further back of the three  
 6 officers at the passenger side of the vehicle.  
 7 A. Yes, sir.  
 8 Q. But you're also sort of positioned between BY28 and  
 9 AY14; do you see that?  
 10 A. Yes, sir.  
 11 Q. And I think this image is timed very nearly at the  
 12 moment at which you begin to fire shots so you know when  
 13 this is?  
 14 A. Yes, I was in between AY14 and BY28 when I fired my  
 15 shots.  
 16 Q. Now, if we look at some footage from the same time, if  
 17 we go to {AV0006} please and tape counter 7.10, this  
 18 should be screen time 22.23.50, real time 22.23.53. So  
 19 this is the same time as the image we've seen but from  
 20 a different angle. We're going to your dashcam of your  
 21 ARV now. If, while watching it, officer, you look at  
 22 the body of the subject on the left-hand side of  
 23 the road, I think you'll see some movement.  
 24 (Video played)  
 25 If we pause there, do you agree that there were two

69

1 spells of movement -- two main spells of movement?  
 2 A. Yes, sir.  
 3 Q. The second happens at the same time as we see smoke on  
 4 the right-hand side of the image, so we can think that  
 5 the second was shots being first. Is it likely that the  
 6 first movement was the movement you saw which caused  
 7 shots to be fired?  
 8 A. I believe so, sir, yes.  
 9 Q. You said that you got out of the driver's side of the  
 10 vehicle, obviously. You said that you walked forward in  
 11 front of the vehicle, you walked across the front of it,  
 12 and then you got to the passenger side and the position  
 13 we just saw on that CCTV image?  
 14 A. Yes, sir.  
 15 Q. And you weren't aware of the subject on the left-hand  
 16 side of the road until you adopted your position by the  
 17 passenger door?  
 18 A. That's correct.  
 19 Q. Now, this dashcam view is obviously not exactly the view  
 20 that you had because it's going to be lower down,  
 21 I would have thought, than your position except when you  
 22 were crouching, it's over to the right-hand side, you  
 23 were a foot, two feet maybe to the left-hand side, it is  
 24 definitely not the most clear image, we can agree all of  
 25 those things, but do you accept it is a similar

70

1 perspective to what you had? It's a good indicator of  
 2 roughly what it was you would have seen?  
 3 A. Yes, sir.  
 4 Q. Do you agree that the barriers around the Wheatsheaf pub  
 5 provide quite an obstruction?  
 6 A. Yes, sir.  
 7 Q. I'll ask you to watch the clip again, the last 10 or so  
 8 seconds that we saw, and while watching it I would like  
 9 you to consider whether in fact it is possible that you  
 10 could see the explosive vest from that location, and  
 11 it's difficult to tell exactly what can be seen, and the  
 12 colour is very difficult to tell what it is we can see  
 13 on Butt's body, but I would like you to consider whether  
 14 you can actually see Butt's torso from where you are  
 15 standing in your position.  
 16 (Video played)  
 17 Reflecting on it now, officer, do you think you did  
 18 see the IED from when you were standing by that  
 19 passenger door or do you think perhaps you became aware  
 20 of the IED at some other time or in some other way?  
 21 A. As he sat up, I saw the IED.  
 22 Q. Did you perhaps hear others discussing it, did others  
 23 tell you that there was an IED?  
 24 A. So you've got other officers in and around this area  
 25 containing the three subjects and they would have

71

1 pointed out that -- with the camouflage trousers on the  
 2 left-hand side had an IED on him as well.  
 3 Q. And you did see the subject, you say, sitting up at that  
 4 point, so you must have had some sight of his upper body  
 5 at that point?  
 6 A. Yes, sir.  
 7 MR MOSS: Officer, I've got no further questions for you.  
 8 I don't know if others do.  
 9 Questions by MR HORWELL QC  
 10 MR HORWELL: I've just got a few.  
 11 And could we return, please, to the image which has  
 12 been shown for most of the time during this witness's  
 13 evidence, it's {DC0001/49}.  
 14 E122, I appear on behalf of the Commissioner for the  
 15 Metropolitan Police, and I just want to ask you a few  
 16 questions putting this event into some form of context.  
 17 A. Yes, sir.  
 18 Q. Now, we have heard that 2017 was an unprecedented year  
 19 for terrorist attacks in this country?  
 20 A. Yes, sir.  
 21 Q. And we know that on 22 March there was the terrorist  
 22 attack on Westminster Bridge and the  
 23 Palace of Westminster?  
 24 A. Yes, sir.  
 25 Q. And just 12 days before the attack on London Bridge

72

1 there was the attack at the Manchester Arena?  
 2 A. That's correct, sir.  
 3 Q. In which a suicide bomber had detonated his device at  
 4 a stadium in Manchester --  
 5 A. Yes, sir.  
 6 Q. -- as people were leaving, and from that attack, 22  
 7 people died, and 116 were injured.  
 8 A. Yes, sir.  
 9 Q. Now, on your way to Stoney Street, you knew from radio  
 10 transmissions and from the declaration of Plato, that  
 11 this had also been a terrorist attack?  
 12 A. That's correct, sir.  
 13 Q. And your knowledge at that stage was limited to this  
 14 being first of all an attack by use of a vehicle on  
 15 London Bridge?  
 16 A. Yes, sir.  
 17 Q. And from whatever else you might have heard, as you  
 18 arrived at Stoney Street, you saw one civilian badly  
 19 injured, covered in blood.  
 20 A. That's correct, sir.  
 21 Q. And you, like many other officers, have referred to the  
 22 then very recent events in Manchester and the attack at  
 23 which so many people had died. What influence, if any,  
 24 do you think the Manchester attack had on you that  
 25 night?

73

1 A. When I first approached the first subject on the  
 2 right-hand side and once I looked down and realised he  
 3 had what I believed to be a person-borne IED on his  
 4 torso, I thought this was going to be a similar attack  
 5 to Manchester. I believed these to be suicide bombers.  
 6 Q. And of course you had no idea how these devices compared  
 7 to the devices used in Manchester?  
 8 A. No, sir.  
 9 Q. They could have been smaller, the same, or greater in  
 10 explosive force?  
 11 A. Yes, sir.  
 12 Q. And of course, terrorists don't just use explosives;  
 13 they use shrapnel attached to explosives, such as ball  
 14 bearings?  
 15 A. Correct, sir.  
 16 Q. To maximise death and injury?  
 17 A. Yes, sir.  
 18 Q. And we've heard on a number of occasions now that, of  
 19 course, the police officers at the scene were worried  
 20 about their lives and their safety, but paramount in  
 21 your mind was the safety of the civilians in the  
 22 Wheatsheaf and in many of the other restaurants and  
 23 public houses?  
 24 A. Absolutely, sir.  
 25 Q. And as we look at this image of you and other police

74

1 officers -- well, we can all see the distance, it's but  
 2 metres from these terrorists -- your training is that  
 3 the safe distance to put yourself between yourself and  
 4 the bomb is at least 100 metres?  
 5 A. Yes, sir.  
 6 Q. And that simply wasn't possible if you were going to  
 7 protect the civilians in the Wheatsheaf and elsewhere?  
 8 A. No, it wasn't possible to get that far back.  
 9 Q. And that's why you had to stay where you were, close to  
 10 the car, not offering you much cover --  
 11 A. Not much sir, no.  
 12 Q. -- but some. And when you, by now concentrating on  
 13 Butt, the terrorist on the left, when you saw him move  
 14 and get up, what did you think might be about to happen?  
 15 A. I thought his IED would detonate and I thought there  
 16 would be loss of life, the members of the public in the  
 17 pub, and colleagues.  
 18 Q. And that's why you opened fire?  
 19 A. Yes, sir.  
 20 MR HORWELL: Thank you.  
 21 MR MOSS: We have no further questions for you, officer.  
 22 Thank you very much for giving your evidence and thank  
 23 you for everything that you did on the night.  
 24 A. Thank you, sir.  
 25 THE CHIEF CORONER: Thank you very much indeed, officer.

75

1 MR MOSS: Sir, our final witness is AY37.  
 2 THE CHIEF CORONER: Thank you.  
 3 AY37 (sworn)  
 4 THE CHIEF CORONER: Good afternoon, please do take a seat,  
 5 officer. The microphone is positioned so that when you  
 6 sit down it will help amplify your voice.  
 7 A. Thank you, sir.  
 8 Questions by MR MOSS  
 9 MR MOSS: Officer, you are a sergeant in the  
 10 Metropolitan Police Service and you are being known as  
 11 AY37 in these Inquests, is that right?  
 12 A. That's correct, sir.  
 13 Q. And you appreciate, I'm sure, that you are here to give  
 14 evidence about what you did, what you saw and what you  
 15 heard on 3 June 2017?  
 16 A. I do, sir.  
 17 Q. And you made two witness statements, I think you have  
 18 them in front of you there, and you may refer to those  
 19 if you need to.  
 20 A. Thank you.  
 21 Q. Is it right that you joined another police force in 2004  
 22 and then you moved into the Met in 2013?  
 23 A. That's correct, yes, sir.  
 24 Q. And in that other police force, you had been a temporary  
 25 sergeant in your last few years, and you became

76

1 a substantive police sergeant in the Met in 2014?  
 2 A. Yes, that's correct, sir.  
 3 Q. And in the past, you've been trained as a licensed  
 4 search officer and as a police search advisor?  
 5 A. I was, yes.  
 6 Q. And those roles include significant training in the  
 7 recognition of explosive devices?  
 8 A. Yes, that's correct.  
 9 Q. And it was as a sergeant in November 2016 that you  
 10 commenced your training as an ARV officer?  
 11 A. I did, sir.  
 12 Q. And I think you completed that in January 2017 and you  
 13 moved on to the armed response vehicles?  
 14 A. Yes, that's correct, sir.  
 15 Q. And it was on one of those vehicles that on 3 June you  
 16 were deployed?  
 17 A. I was. I was on call sign 91C with two colleagues.  
 18 Q. And that was on a shift that began at 11.00 am?  
 19 A. It did, yes, sir.  
 20 Q. And those two colleagues were D4 and E59, I think.  
 21 A. They were, sir.  
 22 Q. And you were the driver?  
 23 A. Negative, I was the front seat operator --  
 24 Q. D4 was the driver?  
 25 A. -- D4 was driving and E59 was our maps in the rear

77

1 offside.  
 2 Q. As the front seat operator, what's your responsibility?  
 3 A. Generally communications, so monitoring the radio  
 4 channels on the hand-held radios and the hand-held  
 5 radios in the car -- sorry, not the hand-held radios,  
 6 the actual car sets built into the vehicle, and if we're  
 7 at an incident operating the mobile data terminals which  
 8 we had at the time in the vehicles, they have changed  
 9 since, but if there was an incident as such I would  
 10 monitor those.  
 11 Q. Your day shift had been spent on central London counter  
 12 terrorism patrols?  
 13 A. It had, sir, yes.  
 14 Q. Whilst carrying out those patrols, what personal  
 15 protective equipment would you have had to hand?  
 16 A. So in terms of personal protective equipment I was  
 17 wearing my body armour with the usual appointments, so  
 18 handcuffs, baton, extendable asp, referred to as a  
 19 baton, CS spray. I had an X26 taser at the time, which  
 20 was mounted on my body armour, and my secondary weapon,  
 21 which was my Glock, which was in the drop leg holster on  
 22 my right leg as well.  
 23 Q. And in what condition were your primary and secondary  
 24 weapon?  
 25 A. So all of the weapons, taser, Glock and G36, which was

78

1 the primary carbine that I was carrying at the time,  
 2 they were all made ready at the start of my shift into  
 3 condition 1.  
 4 Q. What does that mean?  
 5 A. In terms of making ready, sir, making the appropriate  
 6 checks of the weapons, that they're clear when you take  
 7 them and then, in layman's terms, loading the weapons so  
 8 that they are in a position to, when you select the  
 9 weapon to either fire or remove the safety from them,  
 10 that they are in a state where, if you pull the trigger,  
 11 or in the case of the taser activate it, it will deliver  
 12 the bullet in the case of the firearms, or deliver the  
 13 barbs in the case of the taser. So effectively they are  
 14 all made ready to fire should you need to do so.  
 15 Q. Shortly after 10 o'clock in the evening you were at your  
 16 ARV base, which is in Lambeth, and a call came out on  
 17 the radio; is that right?  
 18 A. That's correct, sir, yes.  
 19 Q. And the jury heard evidence last Friday from the driver,  
 20 D4, who said that permission had been given for the  
 21 vehicle to be de-kitted from about 10.15. So is it  
 22 right that you were there in anticipation of that?  
 23 A. That's correct, sir. We'd been, as I say, on pan-London  
 24 effectively security patrols most of the day. We had  
 25 escorted the Queen's Life Guard as a tasking during the

79

1 shift, so there was various taskings on the computer  
 2 systems that needed updating and general admin which we  
 3 were completing when we'd been given the authorisation  
 4 to start to de-kit slowly, so ...  
 5 Q. And within the ARV base, where were you doing that  
 6 admin?  
 7 A. I was actually still at our ARV just tidying up the car,  
 8 effectively, changing the batteries on the radios ready  
 9 for the comms kit to be handed over. So just general  
 10 tidying really to be honest with you. I think D4 was  
 11 away from the car when the initial call came in.  
 12 I think E59 may well have been either with me or near to  
 13 the vehicle.  
 14 Q. What was the initial call? What did you hear?  
 15 A. I initially became aware of the call, I believe, via  
 16 Trojan 99, which is what we refer to as our OSHU(?), so  
 17 effectively the firearms channel, and it was information  
 18 passed -- I can't remember the exact wording of it, but  
 19 it was along the lines of receiving information that  
 20 a vehicle has crashed on London Bridge and a number of  
 21 pedestrians have been injured in the course of that.  
 22 That was the general sort of -- synopsis is not the  
 23 right word, but that was the gist of what the initial  
 24 information was.  
 25 Q. You may not remember the exact words, I'm sure you do

80

1 remember what went through your head when you heard it?  
 2 A. Yes, I mean absolutely. The scenario was not long after  
 3 Westminster, my team had been on duty during  
 4 Westminster. We were at a heightened level of security,  
 5 and when that information comes through, it could easily  
 6 have been just an RTC, a serious RTC at that, but in the  
 7 back of my mind, gut feeling was this is more than  
 8 likely more than just an RTC.  
 9 Q. A RTC: a road traffic collision?  
 10 A. A road traffic collision, yes.  
 11 Q. So what did you do?  
 12 A. Well, straightaway switched back into ops mode,  
 13 effectively. Prepping the car as fast as humanly  
 14 possible. I wasn't wearing my body armour at the time.  
 15 I'd taken it off for a little break. We'd been sat in  
 16 the car for a little while prior to coming back into  
 17 base, so that was on the seat of the car, so I literally  
 18 threw my body armour on as quick as I could, shouted  
 19 to -- I can't remember whether I shouted to D4 or called  
 20 him, but pretty quickly he was there back at the car and  
 21 as a crew we were prepping to go to the call.  
 22 Q. Are you able to estimate how long it took between you  
 23 hearing the call and you being out on the road?  
 24 A. It was quick. It was, you know, a matter of minutes at  
 25 a maximum. I would be -- really would be speculating,

81

1 but as quick as we could have got back in the car and  
 2 out of the base, we were ready to go.  
 3 Q. And blue lights and sirens were on straightaway,  
 4 I'm sure.  
 5 A. Yes. Yes. Yes.  
 6 Q. Did you get more information on the way to the incident  
 7 about what it was you were going to?  
 8 A. We did. It was -- I don't know how long it took us to  
 9 get there, but it was not long at all. So as I alluded  
 10 to, we left the base, I was still in the process of  
 11 effectively prepping the kit and finishing off doing up  
 12 my body armour. I remember a transmission coming over  
 13 from Trojan 99, so from the ARV channel saying that the  
 14 main working channel appeared to be City Ops 1, which is  
 15 effectively the dispatch channel for policing resources  
 16 in the City of London. I remember that information  
 17 being passed, so I remember taking one of the hand-held  
 18 radios and I think changing one of the car sets to City  
 19 Ops 1 to make sure that we were getting as live a feed  
 20 as possible.  
 21 I know that a lot of other ARV units were putting up  
 22 -- saying that they were travelling as well and  
 23 I remember the transmission clearly coming from the ARV  
 24 pod, as we call it, saying: look, we don't know what's  
 25 happening, effectively all available units travel to

82

1 work out, establish exactly what we've got, even if it's  
 2 just to provide support in a first aid capacity, so  
 3 I remember that information coming initially. And then  
 4 I was passed my primary weapon from E59 in the back.  
 5 Q. That's your carbine?  
 6 A. Yes. At the time I was carrying a G36, Heckler & Koch  
 7 G36, so I was clipping that on to my sling which  
 8 I already had around my bod -- by "bod" I mean body  
 9 armour -- and the next update I remember clearly was  
 10 that people had been moving towards Southwark Cathedral  
 11 and I remember who I believe was an ARV officer saying  
 12 a message similar to: this is definitely CT-related,  
 13 they're moving towards the market, or through the  
 14 market, and by this point we'd already reached the  
 15 bottom end of Borough High Street off Borough Road and  
 16 I remember vividly passing Southwark Police Station at  
 17 speed on our offside and on the Trojan 99 channel  
 18 Op Plato being declared.  
 19 Q. So you had been told on the radio that it looked like  
 20 a CT incident, a counter terrorism incident?  
 21 A. Yes -- sorry.  
 22 Q. If I can clarify the things you have said, you had been  
 23 told on the radio as well that there are attackers  
 24 moving through the market, so you know they're not just  
 25 in one location?

83

1 A. That's correct, sir.  
 2 Q. And then you've also been told that it's Operation  
 3 Plato. Taking all those things together, what were you  
 4 going to? What were you thinking?  
 5 A. Certainly by the time Op Plato was declared there was no  
 6 doubt in my mind that this was a terrorist incident.  
 7 Ultimately that was the gut feeling whilst we were  
 8 travelling anyway, but ...  
 9 Q. So as an ARV officer, knowing all of those things, what  
 10 is your objective when you arrive at the scene?  
 11 A. Well, the basic objective of a firearms operation is  
 12 identify, locate, contain, neutralise, whatever threat  
 13 that might be, but as soon as it's CT-related, it  
 14 changes to the -- the "contain" changes to "confront".  
 15 So in your mind you are quite clear that you could well  
 16 be faced with a high threat here, potentially towards  
 17 yourself, you may have to defend the colleagues in your  
 18 car. I don't really know how to describe it. It's  
 19 very -- your mind is almost hyperfocused on what you may  
 20 have to deal with.  
 21 Q. You've said that you were given your carbine from  
 22 the safe in the back of the vehicle; were any other  
 23 steps taken amongst the three of you whilst you were  
 24 travelling to prepare yourselves for an Op Plato threat?  
 25 A. So we -- as I say, I can't really remember the drive

84

1 there because it happened so quickly, the amount of  
2 admin that I was able to do on that drive was -- almost  
3 sort of speaks volumes for how quickly we got there. As  
4 we entered -- as we were coming up Borough High Street  
5 towards -- sort of towards Southwark Street, which is on  
6 the nearside, we had a -- I remember us having a very  
7 brief discussion about "We're going to head towards the  
8 cathedral", and we had a discussion in the car that we  
9 were going windows down, so by that --

10 Q. What's the purpose of that?

11 A. So the purposes of that is you -- all the windows in the  
12 car are down to the maximum, so you can hear as much as  
13 you can hear in a moving vehicle, you can hear much more  
14 that's going on. It's one less obstruction. Although  
15 it's clear glass in the vehicle, you know, your vision  
16 is much clearer, and if you have to ultimately deliver  
17 a shot whilst either on the move or on arrival, then  
18 your shot placement is going to be much more accurate  
19 because you don't have to consider things like  
20 deflection through glass. You know, that shot will  
21 leave your primary weapon and should go where it's  
22 pointing. So it gives you increased awareness, it gives  
23 you increased situational awareness, and gives you the  
24 best opportunity to try and establish what is going on  
25 and, you know, deliver something that is most

85

1 appropriate to what you find.

2 Q. Where did D4 stop the vehicle?

3 A. So, as I said, we were -- our initial objective was to  
4 head towards the cathedral, so as we reached the  
5 junction where you would go -- Borough High Street  
6 continues straight on towards London Bridge and  
7 Southwark Street comes in from my nearside, so my  
8 left-hand side. We were originally going to go slightly  
9 straight on and, I think, aim for Bedale Street, which  
10 is ...

11 Q. If we imagine Stoney Street being a left-hand turn that  
12 you might have taken, I think you're saying you went  
13 just past Stoney Street but not as far as Bedale Street?

14 A. No, so Southwark Street comes in from the nearside and  
15 Stoney Street travels what I would describe as north  
16 just from Southwark Street, and Borough High Street  
17 continues on straight ahead, and then Bedale Street is  
18 a sort of fork slightly to the left ahead.

19 Q. Would a map help?

20 A. Yes, sorry, I'm probably talking too much to explain  
21 how I --

22 Q. If we look at {MP0006/1}. So Southwark Street is just  
23 out of view at the bottom in the middle, it has a  
24 junction with Borough High Street where you can see  
25 Borough High Street marked. That is just after

86

1 Stoney Street, which is running fairly north, as you  
2 say.

3 A. Yes. So if Borough High Street, as I look at the map  
4 there, I would say it's running towards the north-east.

5 Q. Yes.

6 A. And in my mind, I actually had Bedale as being more  
7 north from that junction, because you can see the  
8 junction of Bedale Street from approaching on Borough  
9 High Street and Stoney Street -- Southwark Street is the  
10 one that's running to the east at the very bottom of the  
11 map.

12 Q. When you get out of the vehicle which way do you go?

13 A. So we paused very momentarily in the middle of the  
14 junction, just below where it says "Borough High Street"  
15 on the map in the bottom corner, so we paused very  
16 momentarily there just to assess what we had and at that  
17 point there is people running everywhere, there is clear  
18 panic, and it's at that point where we hear audible  
19 gunshots.

20 So we paused for a moment. I think I remember  
21 actually saying "Stop, stop, stop" because at that point  
22 I thought we need to stop here, work out what we've got  
23 and deploy from here.

24 Q. Could you tell where the shots were coming from?

25 A. No, not initially .

87

1 Q. Could you tell how many people had fired them? How many  
2 weapons?

3 A. No. They were very loud gunshots, there was a lot of  
4 them, and in my mind, because I was aware that a police  
5 ARV was approaching into Stoney Street, that there was  
6 an exchange of gunfire going on. So in my mind at that  
7 point I was, in no uncertain terms, expecting  
8 a fire-fight .

9 Q. Did D4 stop the vehicle on the pavement on the left?

10 A. He did. He drove straight up and parked the vehicle  
11 just above where it says Borough High Street, there's  
12 what I believe are the steps down into London Bridge  
13 underground, so he parked the vehicle as you look at the  
14 map almost to the north west across the pavement between  
15 where it's -- almost exactly halfway between Padella and  
16 Stoney Street .

17 Q. If we look at a photograph, please, {PH0420/1}, you get  
18 out of the vehicle where D4 has put it on the pavement.  
19 You head towards Stoney Street and this is going to be  
20 the view that you get as you turn the corner towards  
21 Stoney Street; is that right?

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

23 Q. Do you go straight into Stoney Street?

24 A. As I say, I -- there's a lot of people coming out of  
25 Stoney Street and running and there's general panic as

88

1 I alighted from the vehicle and, as I said, in my mind  
 2 I was expecting to find a gunfight in that vicinity  
 3 because, having got out of the vehicle, it was quite  
 4 clear the shots were coming from Stoney Street.  
 5 Q. What weapon did you have with you?  
 6 A. Well, I obviously had my primary weapon -- I was  
 7 carrying my G36 slung in my hand. As I alighted the  
 8 vehicle it's in the sort of low port south position, so  
 9 pointing generally towards the floor, but I'm scanning  
 10 all the time to assess what threat.  
 11 As I got out the vehicle, I vividly remember my  
 12 attention was drawn to a male who was running in a very  
 13 unusual manner, crouched down, and initially I thought  
 14 is he a threat, but he was pointing behind him and sort  
 15 of suggest -- I don't know whether he said, but  
 16 certainly suggesting it was round there.  
 17 Q. You say in your statement in relation to your G36 that  
 18 you had the selector to fire. At what point did you do  
 19 that and what does it mean?  
 20 A. That was as I -- so I remember taking the corner from  
 21 Southwark Street into the right-hand turn into  
 22 Stoney Street in what I describe as a tactical manner,  
 23 so I didn't just run blindly round the corner. It was  
 24 in the low ready position, so sort of 45 degrees ahead  
 25 of me so that if a threat presented itself or I was able

89

1 to identify a threat, I was in a ready position to use  
 2 my weapon.  
 3 Q. When did you first see the attackers?  
 4 A. I am sorry sir, I didn't quite hear the end.  
 5 Q. When did you first see the subjects?  
 6 A. So as I was running whilst trying to maintain as much  
 7 tactical awareness as possible, I became aware of a very  
 8 dark-skinned IC4 male or light-skinned IC3 male, just in  
 9 my periphery as I'm scanning, because people are coming  
 10 out of the street as well, unnatural behaviour. So  
 11 I would say it was probably as I'm -- round about  
 12 underneath the awning, perhaps.  
 13 Q. So you see that person underneath the awning?  
 14 A. No. As I reached the point of about the awning,  
 15 I become aware of --  
 16 Q. Where do you see that person who you are describing?  
 17 A. Well, as you look at the photo it will be ahead of where  
 18 that Met Police ARV is on the right-hand side pavement.  
 19 Q. And you continued towards the ARV?  
 20 A. I continued towards the ARV. I'm aware that there's  
 21 other ARV officers there. I'm also very conscious that  
 22 I'm still not satisfied that the police aren't being  
 23 fired at ourselves, and I'm conscious that -- you can't  
 24 actually see it from that photograph, but there's  
 25 a number of alleyways that run into the market on your

90

1 right-hand side as I go down that pavement, so  
 2 I'm conscious that as I pass those alleyways,  
 3 I'm checking into them to check that I'm not running  
 4 straight past a threat.  
 5 So I would say as I passed those awnings I'm  
 6 initially aware of it, I passed the alleyway to the  
 7 right-hand side and then start to pick up the threat  
 8 at -- the front of where that ARV becomes the main  
 9 focus.  
 10 Q. If we could please go to {DC7283/83}, may that will help  
 11 you describe it. We see there are two ARVs marked. The  
 12 lower down one is the Met ARV that you can see in  
 13 photograph there, and then further up, you see Trojan  
 14 City 1, a City Police ARV.  
 15 A. Yes.  
 16 Q. So where do you get to? Where do you stop?  
 17 A. So as I'm just about to enter Stoney Street on foot, the  
 18 Met ARV is deploying from the ARV, so that's not fully  
 19 come to rest as I come round the corner, if that makes  
 20 sense. So I see my colleagues deploy from the ARV as  
 21 I'm entering Stoney Street.  
 22 Q. And you move with your weapon towards this male you've  
 23 seen. What are you thinking? What are you planning to  
 24 do?  
 25 A. Well, I'm assessing the threat. As I say, on that

91

1 picture in the top right-hand corner, Stoney Street  
 2 looks -- it doesn't look like there's many pedestrians  
 3 on there but as I'm entering Stoney Street, there's  
 4 pedestrians coming out of there, so I have in my  
 5 periphery I'm almost filtering people in my peripheral  
 6 view as I enter, if that makes sense.  
 7 Q. Is it right that you move to the right-hand side of the  
 8 ARV as you're looking at it?  
 9 A. Yes. So I carry on down the pavement past the alleyways  
 10 on the right-hand side and move between the actual  
 11 market stalls, market shops, and the ARV itself.  
 12 Q. And what do you then see?  
 13 A. I see a male -- the male -- there's a male, and what now  
 14 becomes clear is an IC4 male has fallen, head towards  
 15 me, on his back in front of the ARV on the pavement.  
 16 Q. You had previously seen him moving unusually. Is it  
 17 right that he is on the floor by the time that you get  
 18 there; you don't see him falling?  
 19 A. Yes, as I say, my perception was that he was falling.  
 20 That was my initial gut reaction as I first sighted him  
 21 coming onto Stoney Street, but that is obviously from  
 22 a distance. But what I would describe that as it was  
 23 very much an unnatural movement so it was either a roll,  
 24 it was something that catches your eye as out of the  
 25 ordinary in front of you, so it's quite clear that he

92

1 either was in the process of falling or was rolling  
 2 having fallen as I first see him.  
 3 So I continue, maintain my eye contact with him, and  
 4 bring firearms cover up on to him, so effectively I've  
 5 moved from being in a low ready position with my carbine  
 6 to actually pointing and aiming at the centre body mass  
 7 of him. So I've moved up to maintain firearms cover and  
 8 I push up almost ahead of the front of the Met ARV there  
 9 into a position where I'm actually very close to him and  
 10 assessing what I've got. I'm also --  
 11 Q. Can you describe his clothing?  
 12 A. Only that my perception and from my memory and at the  
 13 time was that it was all black clothing.  
 14 Q. Can you describe anything else noteworthy about his  
 15 appearance?  
 16 A. Well, ultimately I had become very aware that he has  
 17 what I would describe as a person-borne improvised  
 18 explosive device, so he's wearing some sort of explosive  
 19 device on his --  
 20 Q. When did you first see that?  
 21 A. I pushed right up into the firearms cover assessing.  
 22 I've also become aware that there is a second person  
 23 that is on the floor very near to him further up  
 24 Stoney Street. I'm aware that there's a couple of  
 25 members -- or what I assume were members of the public

93

1 which were very, very close to this down subject, so  
 2 I almost pushed up to put myself between those members  
 3 of the public and the subject, and then start to  
 4 withdraw back, moving them out the way, when I realise  
 5 what we're dealing with, and at that point I'm shouting  
 6 verbally "IED, IED, IED", at the top of my voice to make  
 7 sure that all my colleagues around me are aware.  
 8 The easy assumption to make is that they were aware  
 9 and seeing the same thing, but I just wanted to be  
 10 absolutely clear that that is what I am seeing.  
 11 Q. How many subjects have you seen in total then at that  
 12 point?  
 13 A. I only ever saw two subjects.  
 14 Q. How many IEDs have you seen at that point?  
 15 A. The only one that I saw in real focus was the one on the  
 16 male that was nearest to me, so the one in the dark  
 17 clothing that I describe in my statement. Because  
 18 I'm conscious that there are other ARV officers that are  
 19 giving verbal commands and covering other subjects.  
 20 Q. So focusing on the subject nearer the ARB on whom you  
 21 were focusing, what was he doing when he was on the  
 22 ground?  
 23 A. So he'd fallen on his back, hands were slightly in the  
 24 air sort of towards his stomach area, but I could see  
 25 that his hands were slightly open.

94

1 Q. Was he moving or was he still?  
 2 A. Yes, moving very slightly. His arms moving very  
 3 slightly. They weren't sudden movements, but they were  
 4 certainly still moving.  
 5 Q. What did -- what was your assessment of the threat?  
 6 A. That the threat was -- I mean, all this comes in  
 7 an absolute split second, and I'm explaining in minute  
 8 detail what probably was the space of, you know,  
 9 a matter of seconds, but in your mind you can't be any  
 10 more focused that the threat that's there, in my mind  
 11 I'm thinking this does not get any more serious than  
 12 this. You know, we've got members of the public, we've  
 13 got police colleagues right on top of what, in my mind,  
 14 was a suicide bomber there.  
 15 Q. Did you think of taking any action?  
 16 A. I did, I actually -- I know that I was -- already  
 17 selected to fire, I was moving my finger towards the  
 18 trigger, and in that very split second, I had -- I was  
 19 obviously assessing the threat. In my mind I'm thinking  
 20 I don't want to fire into the suicide vest itself,  
 21 because that could detonate it. So I'm -- in my mind  
 22 I'm ready to take the shot, but I also have  
 23 a realisation that other ARV officers are there, they've  
 24 had more continuity of this threat than I have, even if  
 25 it's only by a matter of 2-3 seconds, that's 2-3 seconds

95

1 more assessment time, and at that point there, they're  
 2 not shooting, so it's almost like: have I missed  
 3 something here?  
 4 Q. Did you have any doubt that it was an IED?  
 5 A. In my mind there was absolutely no doubt at all.  
 6 I tried to look in as much focus as I could to try and  
 7 see how it was made up. I mean, it was very clearly  
 8 improvised but in my mind I was in absolutely no doubt  
 9 at all that it was a genuine improvised device. It was  
 10 certainly interconnected, there was a lot of gaffer tape  
 11 wrapped around it. I think I described the what  
 12 I assumed were main charges almost being like block  
 13 paving sized bricks wrapped in gaffer tape and it was  
 14 all interconnected. So in my mind it was completely  
 15 viable and it was a viable threat to everyone that was  
 16 there.  
 17 Q. Could you say how many officers had this subject covered  
 18 at that time?  
 19 A. There was at least two because I was aware of --  
 20 Q. In addition to you or including you?  
 21 A. In addition to me. I was aware that E59 was covering  
 22 that subject because he was to my left-hand side at that  
 23 point, and he was, I think, to the nearside of -- sorry,  
 24 to the offside of the ARV as well, and there was also  
 25 ARV officers over the bonnet of the ARV. So there was

96

1 a number of other officers covering him at that time.  
 2 Q. Is it right, then, that something distracted your  
 3 attention away from the subject?  
 4 A. Yeah, I mean the noise was unbelievable. I can't --  
 5 I can't describe the noise that was going on in  
 6 Stoney Street at that time. You've obviously got the  
 7 sirens, the screaming, and there's a whole load of  
 8 shouting coming from in the market itself, and I'm also  
 9 conscious that we are -- we're ultimately too close to  
 10 these explosive devices and there's members of the  
 11 public immediately to the right-hand side of me which  
 12 I've got between who need clearing away.  
 13 But the noise that was coming from within the  
 14 market, I was in no doubt that there was further attacks  
 15 had either just happened in that market or were ongoing.  
 16 Q. Did you do anything to assist those members of the  
 17 public?  
 18 A. So I -- at that point it was a really difficult  
 19 decision, because I've assessed a firearms threat there  
 20 but I've had to make the decision that I'm going to  
 21 leave that with my colleagues and I'm going to have to  
 22 go and deal with whatever's happening in the market  
 23 here, so I've cleared those members of the public away  
 24 down the alleyway, and in the back of my mind at that  
 25 time that was a really difficult decision as well

97

1 because I felt I can't send them back past the IEDs but  
 2 also I've moving into the market here because it sounds  
 3 likes there is further attacks going on within the  
 4 marketplace, so what am I actually taking them into?  
 5 Q. So looking at that map, where did you go?  
 6 A. So to the right-hand side, where the purple dot is,  
 7 above the Met ARV at the bottom there, I went up that  
 8 alleyway into the middle of the market.  
 9 Q. While you were doing this, could you hear anything  
 10 happening back in Stoney Street?  
 11 A. I mean, I could hear there was clear -- there was  
 12 tactical communication going on from ARV officers  
 13 towards the subjects on the floor behind me as I moved  
 14 into the market. There was a lot of screaming. There  
 15 was a lot of commotion within the market itself. There  
 16 was people running and there was people moving about  
 17 within the market itself.  
 18 Q. Did anything happen back at Stoney Street that caused  
 19 you to go back to Stoney Street?  
 20 A. Well, I reached -- I'd reached a point in the middle of  
 21 the market, probably just where the bottom corner of  
 22 that photo is, so I had a visual back towards where --  
 23 almost where we parked our ARV originally and a view up  
 24 the alleyways, and at that point as I was in the middle  
 25 I was startled by extremely loud gunfire from behind me,

98

1 back on Stoney Street, and I don't know if it's because  
 2 there's a slight cover to Borough Market, a roof and the  
 3 way that the noise echoes, but the sound of gunfire was  
 4 so loud within the market that in my mind at that point  
 5 I thought other attackers had come round and had started  
 6 firing upon the police officers back on Stoney Street.  
 7 I was convinced that they were being attacked, so I ran  
 8 back towards Stoney Street to assess what was going on.  
 9 I didn't take the same alleyway, I actually went, where  
 10 it says "telephone kiosk" in a direct line leading  
 11 across to El Pastor, I took that alleyway, I believe.  
 12 MR MOSS: Sir, I see the time. I have just a few minutes of  
 13 further questions and then that will be the end of the  
 14 evidence for today. I can ask them at 2 o'clock or  
 15 I can ask them now?  
 16 THE CHIEF CORONER: Are we going to see any of the footage;  
 17 that was the only question?  
 18 MR MOSS: Sir, I was going to look at a still from CCTV, but  
 19 no footage.  
 20 THE CHIEF CORONER: Well, at the invitation, Mr Moss, that  
 21 we may get a short day, I'm sure the jury would prefer  
 22 us to take five minutes now.  
 23 MR MOSS: I thought that might be the case.  
 24 So you move from where we see the words "Telephone  
 25 kiosk", which is at the bottom corner of the CCTV still?

99

1 A. That's correct, sir.  
 2 Q. And you move through that middle part directly towards  
 3 where we see El Pastor.  
 4 A. Yes, directly towards, I wasn't conscious of it being  
 5 El Pastor, but that's the alleyway route I took there's  
 6 an extremely large pillar which is probably around about  
 7 where those hatchings are still on the offside pavement  
 8 and there was a -- one of my City Police ARV colleagues  
 9 was crouched behind that pillar, so I went to that  
 10 point, assessing out to the right-hand side to check  
 11 that there was no threat from there.  
 12 Q. Had you heard shots by this point?  
 13 A. I'd heard shots from that point, yes.  
 14 Q. If we look, please, at {DC7248/13} we will see a CCTV  
 15 still taken from the direction of the telephone kiosk  
 16 down towards El Pastor, and we'll see you are marked  
 17 there as AY37, there is BX44 behind that green pillar  
 18 and then to the left-hand side is where the Met ARV is?  
 19 A. That's correct, sir, yes.  
 20 Q. The timing on this image is 22.18.26. That's the real  
 21 time. This is as you were approaching BX44.  
 22 A. Yes.  
 23 Q. This is very, very shortly after you heard shots being  
 24 fired; is that what you said?  
 25 A. That's correct, sir, yes.

100

1 Q. In fact, I think shots hadn't been fired by this point,  
2 the second round of shots hadn't been fired. Is it  
3 right that maybe you are mistaken and that you have  
4 heard something else that made you go to that part of  
5 the road?  
6 A. It was certainly gunfire that made me return to the  
7 pillar because I wanted to check that we'd not been  
8 fired upon again, because there was a second -- having  
9 clarified that we weren't being attacked again, I'd  
10 tried to communicate with someone in the Wheatsheaf and  
11 then once I was satisfied that it wasn't a further  
12 attack I continued back into the market and there was  
13 further gunfire having continued back into the market.  
14 Q. Did you ever see any shots being fired, apart from right  
15 at the beginning whilst you are running towards the ARV?  
16 A. No, no, the initial -- not apart from the initial move  
17 into Stoney Street.  
18 Q. Are you able to say anything to the jury about which  
19 officers it was that fired the shots? Did you see any  
20 officers taking any shots or not?  
21 A. No, I wasn't -- I can only say that police were firing  
22 shots initially on Stoney Street.  
23 Q. When you got back to Stoney Street, were there members  
24 of the public still around?  
25 A. The -- I wasn't conscious of members of the public in

101

1 the street but I was very conscious of a male that came  
2 to the door of the Wheatsheaf.  
3 Q. Did you have a view similar to this towards the  
4 Wheatsheaf?  
5 A. I was looking directly across Stoney Street towards him,  
6 so he was probably about 15 metres away.  
7 Q. Were you able to get to the pub?  
8 A. No, because I was -- I knew -- where I entered the  
9 market I knew that there was a number of police ARV  
10 officers and if I crossed Stoney Street there, I was  
11 crossing their arcs of fire and I was very conscious  
12 that further shots had been fired, so I didn't want to  
13 be in a blue-on-blue situation or compromise anything  
14 they were doing.  
15 Q. Were you needed to offer further cover to the officers  
16 dealing with the attackers?  
17 A. No, I had a very quick chat with the -- with BX44,  
18 clarified that we hadn't been further attacked, that it  
19 was in hand, they were covering what we had. I just had  
20 a very frustrating interaction with the male in the  
21 Wheatsheaf because I couldn't communicate clearly with  
22 him, I just wanted to try and establish that there  
23 wasn't an ongoing threat within the pub. I remember he  
24 made some sort of, almost like a cut throat signal by  
25 moving his hand across his throat.

102

1 Q. What did you understand by that signal?  
2 A. Well, it was difficult to understand exactly what he  
3 meant by it, but what was clear was there wasn't  
4 an ongoing threat of attacks within the pub: I took it  
5 that there's people injured in there, but in the back of  
6 my mind, almost a hierarchy of threat, he's at the front  
7 of the pub, he's got a number of IEDs in the street  
8 outside. If there's people injured within the pub, it's  
9 safer for them to be in the pub as far away from the  
10 IEDs as possible, away from the blast, and we weren't in  
11 a position to be clearing that at that point there.  
12 Q. So there was no way you could safely get to the pub and  
13 you weren't needed to take up a containment position in  
14 respect of the attackers, so is it right that you then  
15 went and put in a sizeable cordon, a 100-metre cordon?  
16 A. Well, as I say, I was still concerned about what had  
17 been occurring in the market, so I wanted to push  
18 through, make sure there was no further attackers within  
19 the market, clear as many people away from the market as  
20 possible so that there's less people at risk, less  
21 people at risk of being injured.  
22 Q. So you focused your attention away from Stoney Street?  
23 A. Yes, yes, because at that point I don't know how many  
24 attackers there are, if there's any outstanding, and  
25 part of -- the aim was effectively prevent the situation

103

1 from getting worse, less people being at risk, try and  
2 minimise that as much as possible, sir.  
3 Q. And is it right that for the rest of your shift, you  
4 continued in the search of buildings and the search of  
5 various locations around this area until a time that you  
6 then helped the London Ambulance Service as they entered  
7 into what they thought was a warm or a hot zone to help  
8 casualties?  
9 A. Yes, that's correct, sir. I tried to help -- there was  
10 information that came in about other attackers during  
11 that period and other attacks were being reported, so it  
12 was a case of -- well, yeah, a number of single person  
13 emergency searches, holding the cordon towards the  
14 riverside so that there was less people coming in, there  
15 wasn't people coming into the Stoney Street area, and we  
16 evacuated a number of people from the Golden Hinde pub  
17 before, as you say, sir, escorting the LAS into what  
18 ultimately probably became the main scene of the attack  
19 in Green Dragon Court down towards the Mudlark.  
20 MR MOSS: Sergeant, thank you very much. I have no further  
21 questions for you. I don't know if others do.  
22 THE CHIEF CORONER: Yes, thank you very much indeed,  
23 officer. Thank you.  
24 A. Thank you, sir.  
25 MR MOSS: Officer, thank you for your evidence.

104

1 And sir, thank you for the extra time. 107

2 THE CHIEF CORONER: Members of the jury, we've sat on

3 a little bit later because I don't need you for the rest

4 of the day, is the short point. We've got through the

5 witnesses that we had today. So we'll pick up on

6 matters tomorrow morning, please, at 10 o'clock.

7 Thank you. Please feel free to make your way out.

8 (In the absence of the jury)

9 MR HOUGH: Sir, for the benefit of those watching and

10 listening in court 19 and for those reading the

11 transcript, tomorrow's witness will not be the subject

12 of special measures but will be acting DCI Jolley .

13 THE CHIEF CORONER: Thank you very much. Can I just repeat

14 what I mentioned on Friday. This room is going to be

15 used for an event this evening so if we can all clear

16 away as much as I can, and I'll ask the usher to

17 retrieve the jury's documents so they can be kept

18 securely and safely, just in case anyone goes there,

19 then at least we will make sure everything is put away

20 safely .

21 Thank you.

22 (1.09 pm)

23 (The court adjourned until 10.00 am on

24 Tuesday, 9 July 2019)

25

105

1 INDEX

2 PAGE

3 BY28 (sworn) .....2

4 Questions by MR HOUGH QC .....2

5 AY14 (sworn) .....31

6 Questions by MR HOUGH QC .....31

7 E122 (sworn) .....50

8 Questions by MR MOSS .....50

9 Questions by MR HORWELL QC .....72

10 AY37 (sworn) .....76

11 Questions by MR MOSS .....76

12

13

14

15

16

17

18

19

20

21

22

23

24

25

106

<p><b>A</b></p> <p><b>able (10)</b> 9:12 16:1 20:21 49:18 62:1 81:22 85:2 89:25 101:18 102:7</p> <p><b>above (2)</b> 88:11 98:7</p> <p><b>absence (2)</b> 1:3 105:8</p> <p><b>absolute (1)</b> 95:7</p> <p><b>absolutely (5)</b> 74:24 81:2 94:10 96:5,8</p> <p><b>accept (1)</b> 70:25</p> <p><b>account (5)</b> 12:12 30:4,6 49:6 68:12</p> <p><b>accurate (1)</b> 85:18</p> <p><b>across (10)</b> 19:3,11,19 58:15 60:1 70:11 88:14 99:11 102:5,25</p> <p><b>acting (1)</b> 105:12</p> <p><b>action (1)</b> 95:15</p> <p><b>activate (3)</b> 44:1 46:6 79:11</p> <p><b>actual (4)</b> 6:5 22:1 78:6 92:10</p> <p><b>actually (35)</b> 4:15 6:6 10:8 11:25 12:10 14:7,7 15:5,17 18:19,20 19:5 20:18 21:24,25 22:5,10,12,19 24:1 26:17 29:4 34:19,22 58:9 71:14 80:7 87:6,21 90:24 93:6,9 95:16 98:4 99:9</p> <p><b>addition (2)</b> 96:20,21</p> <p><b>adhering (1)</b> 15:21</p> <p><b>adjoined (1)</b> 105:23</p> <p><b>admin (3)</b> 80:2,6 85:2</p> <p><b>adopted (1)</b> 70:16</p> <p><b>advisor (1)</b> 77:4</p> <p><b>after (34)</b> 3:2,22 17:12,18 18:1 25:1,2,5,14 27:23 28:3 29:17 30:9 31:11 43:17 44:15 45:15 46:16 48:17 49:4 53:11 58:6 61:23 66:9,11,21 67:3,9,17,18 79:15 81:2 86:25 100:23</p> <p><b>afternoon (1)</b> 76:4</p> <p><b>afterwards (2)</b> 21:22 30:17</p> <p><b>again (16)</b> 1:7 13:21 16:7 23:4 26:13,16 27:25 37:3 39:25 42:7 45:19 46:2 48:6 71:7 101:8,9</p> <p><b>ago (1)</b> 40:7</p> <p><b>agree (4)</b> 42:19 69:25 70:24 71:4</p> <p><b>agreed (1)</b> 64:18</p> <p><b>ahead (8)</b> 9:25 47:1 56:4 86:17,18 89:24 90:17 93:8</p> <p><b>aid (5)</b> 4:22 67:10,11,16 83:2</p> <p><b>aim (11)</b> 24:12 25:7 44:22 45:1,2,16,22 54:13 66:17 86:9 103:25</p> <p><b>aimed (7)</b> 24:11,12 25:3,10 45:13 66:12,13</p>	<p><b>aiming (5)</b> 24:21,22,24 66:15 93:6</p> <p><b>air (1)</b> 94:24</p> <p><b>airwave (1)</b> 4:11</p> <p><b>albeit (1)</b> 62:16</p> <p><b>alerted (1)</b> 53:14</p> <p><b>alighted (2)</b> 89:1,7</p> <p><b>alive (6)</b> 14:2 21:4 38:8,9 63:13,14</p> <p><b>alleyway (6)</b> 91:6 97:24 98:8 99:9,11 100:5</p> <p><b>alleyways (4)</b> 90:25 91:2 92:9 98:24</p> <p><b>allowing (1)</b> 3:5</p> <p><b>aluded (1)</b> 82:9</p> <p><b>almost (12)</b> 84:19 85:2 88:14,15 92:5 93:8 94:2 96:2,12 98:23</p> <p><b>along (7)</b> 13:18 22:6 48:25 55:9,25 60:20 80:19</p> <p><b>alongside (1)</b> 41:17</p> <p><b>already (6)</b> 21:19 37:9 65:19 83:8,14 95:16</p> <p><b>also (39)</b> 3:4 5:11 6:4,20 8:1 10:5 11:19 12:19 13:5,10,11,17,24 14:12 16:7 25:21 28:23 29:2 30:24 32:6,8 39:2 41:7 51:14,19 52:6,10 60:4 64:9 69:8 73:11 84:2 90:21 93:10,22 95:22 96:24 97:8 98:2</p> <p><b>altered (1)</b> 45:16</p> <p><b>although (4)</b> 27:17 30:15 62:9 85:14</p> <p><b>always (1)</b> 69:2</p> <p><b>ambulance (1)</b> 104:6</p> <p><b>ammunition (2)</b> 30:9 49:9</p> <p><b>among (1)</b> 17:6</p> <p><b>amongst (2)</b> 63:8 84:23</p> <p><b>amount (2)</b> 62:13 85:1</p> <p><b>amounts (1)</b> 53:24</p> <p><b>amplify (3)</b> 31:19 50:15 76:6</p> <p><b>angle (1)</b> 69:20</p> <p><b>anonimised (1)</b> 1:12</p> <p><b>another (9)</b> 5:13 6:4 18:22 21:22 27:22 31:7 42:10 69:4 76:21</p> <p><b>anticipation (1)</b> 79:22</p> <p><b>anyone (1)</b> 105:18</p> <p><b>anything (17)</b> 6:17 9:16 12:22 13:25 20:11 35:19 41:23 43:3,5 44:5 65:14 93:14 97:16 98:9,18 101:18 102:13</p> <p><b>anyway (2)</b> 23:23 84:8</p> <p><b>apart (2)</b> 101:14,16</p> <p><b>apologies (2)</b> 4:2 18:11</p> <p><b>apparent (1)</b> 18:2</p> <p><b>appear (5)</b> 19:10 40:16 45:8,16 72:14</p> <p><b>appearance (2)</b> 12:22 93:15</p> <p><b>appeared (10)</b> 35:13 37:16 38:9 42:2 43:20 44:11 45:10 63:12,15</p>	<p>82:14</p> <p><b>appears (2)</b> 27:18 49:24</p> <p><b>applebees (1)</b> 15:2</p> <p><b>appointments (1)</b> 78:17</p> <p><b>appreciate (4)</b> 20:20 23:8 50:25 76:13</p> <p><b>approach (4)</b> 8:14 17:1 35:2 40:16</p> <p><b>approached (16)</b> 7:19 8:6,22 9:7 10:1,2 11:4,5 16:13 22:5 35:6,9,18 37:4,6 74:1</p> <p><b>approaching (6)</b> 8:20 39:11 40:3 87:8 88:5 100:21</p> <p><b>appropriate (5)</b> 3:2 30:5 45:24 79:5 86:1</p> <p><b>approximately (5)</b> 22:16 56:21 60:14 61:19,22</p> <p><b>april (2)</b> 1:11 51:11</p> <p><b>arb (1)</b> 94:20</p> <p><b>arch (1)</b> 22:19</p> <p><b>arcs (1)</b> 102:11</p> <p><b>area (31)</b> 3:25 4:4 5:24 6:24 8:14,18 14:18 22:24 29:8,17,20 33:21 34:24 35:7,9,12 36:5,8 39:17,22 41:24 53:12 54:10 55:18,18 58:12 60:16 71:24 94:24 104:5,15</p> <p><b>areas (1)</b> 29:24</p> <p><b>arena (1)</b> 73:1</p> <p><b>arent (1)</b> 90:22</p> <p><b>arm (5)</b> 23:21 26:6 27:3,11,12</p> <p><b>armed (36)</b> 3:1,9 5:11 7:16,17 10:5,9,10,12,14 11:2 12:15 17:15,17,22 19:20 22:17,21 32:17 35:22 36:10,16,19 37:8,11 39:13 40:9 41:5,18 42:10 51:12,16 52:15 54:8 60:21 77:13</p> <p><b>armour (7)</b> 52:7 78:17,20 81:14,18 82:12 83:9</p> <p><b>arms (2)</b> 43:23 95:2</p> <p><b>around (34)</b> 3:24 4:3 9:11 11:19,20,23,23 13:23 14:4 17:5 25:18 28:17 29:2,11,11 35:10 37:22 58:5 39:8 48:19 53:11 58:3 60:5,15 64:14 66:24 71:4,24 83:8 94:7 96:11 100:6 101:24 104:5</p> <p><b>arrangements (1)</b> 30:5</p> <p><b>arrival (1)</b> 85:17</p> <p><b>arrive (1)</b> 84:10</p> <p><b>arrived (2)</b> 61:23 73:18</p> <p><b>arsenal (2)</b> 39:2 41:25</p> <p><b>arv (45)</b> 40:21 51:16 53:5 55:15 60:10 61:18 67:21,23 69:21 77:10 79:16 80:5,7 82:13,21,23 83:11 84:9 88:5 90:18,19,20,21 91:8,12,14,18,18,20</p>	<p>92:8,11,15 93:8 94:18 95:23 96:24,25,25 98:7,12,23 100:8,18 101:15 102:9</p> <p><b>arvs (3)</b> 33:20 54:1 91:11</p> <p><b>ask (5)</b> 71:7 72:15 99:14,15 105:16</p> <p><b>asked (2)</b> 1:14 28:25</p> <p><b>asp (1)</b> 78:18</p> <p><b>assess (4)</b> 65:11 87:16 89:10 99:8</p> <p><b>assessed (4)</b> 27:20 53:23 65:12 97:19</p> <p><b>assessing (5)</b> 91:25 93:10,21 95:19 100:10</p> <p><b>assessment (3)</b> 66:7 95:5 96:1</p> <p><b>assist (4)</b> 26:12 28:23 48:23 97:16</p> <p><b>assume (1)</b> 93:25</p> <p><b>assumed (1)</b> 96:12</p> <p><b>assumption (1)</b> 94:8</p> <p><b>atmosphere (1)</b> 16:14</p> <p><b>attached (2)</b> 29:2 74:13</p> <p><b>attack (21)</b> 2:17 5:6 6:1,8,12,16 7:11,12 32:4 55:6 72:22,25 73:1,6,11,14,22,24 74:4 101:12 104:18</p> <p><b>attacked (5)</b> 8:7,9 99:7 101:9 102:18</p> <p><b>attackers (10)</b> 6:18 41:9 83:23 90:3 99:5 102:16 103:14,18,24 104:10</p> <p><b>attacks (8)</b> 7:12 29:24 34:20 72:19 97:14 98:3 103:4 104:11</p> <p><b>attempting (1)</b> 24:2</p> <p><b>attention (3)</b> 89:12 97:3 103:22</p> <p><b>audible (1)</b> 87:18</p> <p><b>authorisation (1)</b> 80:3</p> <p><b>authority (1)</b> 4:7</p> <p><b>av0005 (2)</b> 25:24 46:20</p> <p><b>av0006 (5)</b> 16:14 26:23 40:1 47:21 69:17</p> <p><b>available (3)</b> 29:25 63:3 82:25</p> <p><b>aware (36)</b> 5:10 6:7 8:8 12:8 13:4 14:9 20:13,17 21:18,19,22 25:18,20,21 54:19 59:9 60:10 61:4 63:5 65:3 67:7 70:15 71:19 80:15 88:4 90:7,15,20 91:6 93:16,22,24 94:7,8 96:19,21 awareness (3) 85:22,23 90:7</p> <p><b>away (21)</b> 11:21 18:25 19:8,8 35:11 38:13 39:17,22 55:10 62:21 80:11 97:3,12,23 102:6 103:9,10,19,22 105:16,19</p> <p><b>awning (3)</b> 90:12,13,14</p> <p><b>awnings (1)</b> 91:5</p> <p><b>ay14 (14)</b> 2:4 3:17 13:10 14:11 21:17 25:20 31:15,16,24 41:14 51:20 69:9,14</p>	<p>106:5</p> <p><b>ay37 (7)</b> 2:4 50:10 76:1,3,11 100:17 106:10</p> <p><b>B</b></p> <p><b>b (1)</b> 54:14</p> <p><b>back (53)</b> 4:19,20,24,24 10:4,13 14:23 15:12,14,19,20,20 22:4 23:22 24:23 26:21 38:18 39:17 41:17 42:6 45:19 48:10 57:25 58:3,7,16 65:7 67:25 69:5 75:8 81:7,12,16,20 82:1 83:4 84:22 92:15 94:4,23 97:24 98:1,10,18,19,22 99:1,6,8 101:12,13,23 103:5</p> <p><b>backed (1)</b> 38:13</p> <p><b>backtoback (3)</b> 6:1,7 66:3</p> <p><b>badly (1)</b> 73:18</p> <p><b>bags (1)</b> 4:22</p> <p><b>ball (1)</b> 74:13</p> <p><b>ballistic (1)</b> 62:5</p> <p><b>barbs (1)</b> 79:13</p> <p><b>barriers (4)</b> 36:6 47:1,23 71:4</p> <p><b>base (12)</b> 3:22 5:12 33:13 53:5,12 54:4,9 79:16 80:5 81:17 82:2,10</p> <p><b>based (2)</b> 27:17 32:21</p> <p><b>basic (1)</b> 84:11</p> <p><b>basically (2)</b> 4:14 15:11</p> <p><b>baton (2)</b> 78:18,19</p> <p><b>batteries (1)</b> 80:8</p> <p><b>bearing (1)</b> 34:22</p> <p><b>bearings (1)</b> 74:14</p> <p><b>became (5)</b> 71:19 76:25 80:15 90:7 104:18</p> <p><b>become (6)</b> 21:22 32:13 63:5 90:15 93:16,22</p> <p><b>becomes (2)</b> 91:8 92:14</p> <p><b>bedale (5)</b> 86:9,13,17 87:6,8</p> <p><b>before (16)</b> 3:4,21,24 4:3 16:24 18:25 20:16 31:11 32:18 41:9 44:5 47:16 65:14 67:5 72:25 104:17</p> <p><b>beforehand (1)</b> 23:23</p> <p><b>began (2)</b> 63:21 77:18</p> <p><b>begin (5)</b> 27:12 32:17 65:5,24 69:12</p> <p><b>beginning (2)</b> 68:24 101:15</p> <p><b>begins (1)</b> 64:23</p> <p><b>behalf (1)</b> 72:14</p> <p><b>behaviour (1)</b> 90:10</p> <p><b>behind (12)</b> 5:13 16:23 26:25 41:5 46:23 47:24 62:12 89:14 98:13,25 100:9,17 being (48) 1:13,14 2:2,13 5:7 6:4,6,7,17 7:14,24 8:9 14:9 18:17 21:3 23:4 24:15 25:18 26:7 27:4 31:24 41:9 49:2 50:23 55:1,1,21</p>	<p>57:7 68:15 70:5 73:14 76:10 81:23 82:17 83:18 86:11 87:6 90:22 93:5 96:12 99:7 100:4,23 101:9,14 103:21 104:1,11</p> <p><b>believe (27)</b> 8:25 10:13,15 11:22 12:19 13:20,22 14:25 15:2,11,21 20:2 21:17,19 25:21 27:21 28:15,21 35:15 63:7 64:24 67:25 70:8 80:15 83:11 88:12 99:11</p> <p><b>believed (24)</b> 5:4,5 6:16 7:10 9:19 10:6 11:7 12:23 13:3 20:3 24:2,3 25:7,16 27:20 28:11 29:8,10 39:20 59:25 65:13 67:13 74:3,5</p> <p><b>below (2)</b> 24:24 87:14</p> <p><b>belt (1)</b> 37:21</p> <p><b>benefit (2)</b> 2:2 105:9</p> <p><b>best (9)</b> 18:16,18 23:3 33:20 62:4,5,15 65:25 85:24</p> <p><b>better (2)</b> 20:3,3</p> <p><b>between (12)</b> 41:8 65:23 66:5 69:8,14 75:3 81:22 88:14,15 92:10 94:2 97:12</p> <p><b>beyond (2)</b> 10:19 17:14</p> <p><b>bit (3)</b> 18:14 38:11 105:3</p> <p><b>black (4)</b> 12:23 20:8 40:22 93:13</p> <p><b>blackfriars (1)</b> 34:12</p> <p><b>blast (3)</b> 15:9 23:2 103:10</p> <p><b>blindly (1)</b> 89:23</p> <p><b>block (5)</b> 62:4,12,14 63:4 96:12</p> <p><b>blood (4)</b> 9:1 11:8 35:14 73:19</p> <p><b>blue (8)</b> 5:20 13:20 14:12 20:9,23 34:1 54:5 82:3</p> <p><b>blueonblue (1)</b> 102:13</p> <p><b>bod (2)</b> 83:8,8</p> <p><b>body (19)</b> 13:23 24:21,22 26:9 43:22 44:21 48:7 52:7 65:6 69:22 71:13 72:4 78:17,20 81:14,18 82:12 83:8 93:6</p> <p><b>bodyworn (3)</b> 52:25 53:4,4</p> <p><b>bomb (3)</b> 15:10 21:4 75:4</p> <p><b>bomber (2)</b> 73:3 95:14</p> <p><b>bombers (1)</b> 74:5</p> <p><b>bonnet (2)</b> 22:20 96:25</p> <p><b>boot (2)</b> 4:20 10:13</p> <p><b>borders (1)</b> 8:17</p> <p><b>borough (25)</b> 2:17 3:25 4:4 5:24 6:24 8:18,19 22:1 32:3 35:7,11 55:18 56:1 83:15,15 85:4 86:5,16,24,25 87:3,8,14 88:11 99:2</p> <p><b>both (10)</b> 9:10 14:3,15 20:3,5 29:3 37:18,19</p>	<p>51:20 59:1</p> <p><b>bottom (7)</b> 83:15 86:23 87:10,15 98:7,21 99:25</p> <p><b>break (8)</b> 31:5,11,13,14 50:3,5,7 81:15</p> <p><b>breathing (2)</b> 14:3 21:1</p> <p><b>breech (1)</b> 52:6</p> <p><b>bricks (1)</b> 96:13</p> <p><b>bridge (24)</b> 3:25 4:4,15 6:11,19,20 8:10,12 33:21 34:12,24 35:15 53:15 54:1,10 55:18,23 56:3 72:22,25 73:15 80:20 86:6 88:12</p> <p><b>brief (1)</b> 85:7</p> <p><b>briefly (1)</b> 46:19</p> <p><b>bring (2)</b> 15:6 93:4</p> <p><b>broadly (1)</b> 22:22</p> <p><b>brought (3)</b> 2:2 23:20,21</p> <p><b>brown (1)</b> 37:21</p> <p><b>buildings (2)</b> 28:20 104:4</p> <p><b>built (1)</b> 78:6</p> <p><b>bullet (1)</b> 79:12</p> <p><b>bullets (1)</b> 9:20</p> <p><b>bunch (3)</b> 29:18 49:1 68:5</p> <p><b>butt (7)</b> 46:25 47:17,23,25 48:12 49:20 75:13</p> <p><b>butts (3)</b> 48:7 71:13,14</p> <p><b>bwv (1)</b> 53:7</p> <p><b>bx44 (6)</b> 12:16 17:17 37:12 100:17,21</p> <p><b>bx45 (1)</b> 17:17</p> <p><b>bx46 (1)</b> 17:17</p> <p><b>by28 (8)</b> 1:25 2:5,13 33:5 51:20 69:8,14 106:3</p> <p><b>by5 (2)</b> 21:23,24</p>
				<b>C</b>		
				<p><b>call (17)</b> 3:24 4:3,10,13,14 5:14 51:17 52:5 53:14 77:17 79:16 80:11,14,15 81:21,23 82:24</p> <p><b>called (5)</b> 6:21 10:17 15:1,2 81:19</p> <p><b>calling (1)</b> 42:4</p> <p><b>calls (4)</b> 33:16,18,22 53:24</p> <p><b>came (8)</b> 12:4 19:5 53:14 63:20 79:16 80:11 102:1 104:10</p> <p><b>camera (4)</b> 16:10 37:5 40:2 53:8</p> <p><b>camouflage (1)</b> 72:1</p> <p><b>cant (15)</b> 5:13 17:8 20:22 37:1 55:22 63:15 67:6 80:18 81:19 84:25 90:23 95:9 97:4,5 98:1</p> <p><b>capacity (1)</b> 83:2</p> <p><b>car (33)</b> 4:7,8,9,20,25 10:7 54:8,13 56:8,9,12,20 57:4,24 58:3,6,22 60:11 63:4</p>		

75:10 78:5,6 80:7,11  
81:13,16,17,20  
82:1,18 84:18 85:8,12  
**carbine (14)** 3:12 11:18  
20:2,4 33:1,2  
52:12,14,17 68:24  
79:1 83:5 84:21 93:5  
**carbines (2)** 4:23 11:6  
**care (2)** 8:3,3  
**carried (4)** 19:11 20:8  
30:8 68:9  
**carry (7)** 8:10,12 31:12  
51:25 67:3,9 92:9  
**carrying (7)** 25:8 52:2  
59:15 78:14 79:1 83:6  
89:7  
**cartridges (1)** 52:7  
**casualties (1)** 104:8  
**catch (1)** 4:2  
**catches (1)** 92:24  
**cathedral (4)** 8:9 83:10  
85:8 86:4  
**caused (3)** 23:17 70:6  
98:18  
**cctv (6)** 12:1 19:6 70:13  
99:18,25 100:14  
**cellars (1)** 15:5  
**cent (1)** 10:25  
**central (1)** 78:11  
**centre (5)** 24:22 44:25  
45:14 66:14 93:6  
**change (1)** 35:20  
**changed (1)** 78:8  
**changes (3)** 64:18  
84:14,14  
**changing (2)** 80:8 82:18  
**channel (8)** 4:11 6:1,5  
80:17 82:13,14,15  
83:17  
**channels (1)** 78:4  
**charges (1)** 96:12  
**chat (1)** 102:17  
**check (4)** 30:21 91:3  
100:10 101:7  
**checking (2)** 18:24 91:3  
**checks (2)** 30:8 79:6  
**chest (5)** 12:25 13:23  
14:13 16:8 39:3  
**chief (26)** 1:4,6,22  
2:1,6,10 26:14,19  
31:2,6,9,12,17 48:8  
50:1,9,14,18 75:25  
76:2,4 99:16,20  
104:22 105:2,13  
**circle (1)** 19:22  
**city (10)** 6:5 17:15 34:8  
40:9 82:14,16,18  
91:14,14 100:8  
**civilian (1)** 73:18  
**civilians (2)** 74:21 75:7  
**clarified (2)** 101:9  
102:18  
**clarify (2)** 58:5 83:22  
**classed (1)** 7:11  
**clear (16)** 17:9 39:17  
48:13 70:24 79:6  
84:15 85:15 87:17  
89:4 92:14,25 94:10  
98:11 103:3,19 105:15  
**cleared (2)** 9:24 97:23  
**clearer (1)** 85:16  
**clearest (2)** 26:14,19  
**clearing (2)** 97:12

103:11  
**clearly (9)** 16:4  
23:22,25 47:7,18  
82:23 83:9 96:7  
102:21  
**clip (1)** 71:7  
**clipping (1)** 83:7  
**close (10)** 11:1 15:22  
34:10,13 40:8 44:14  
75:9 93:9 94:1 97:9  
**closed (1)** 42:1  
**closely (2)** 56:25 59:3  
**closer (7)** 2:8 7:19  
10:16 22:19 40:22  
41:18 45:20  
**clothing (3)** 93:11,13  
94:17  
**colleague (4)** 14:11  
20:1 21:23 48:22  
**colleagues (40)** 4:18 9:7  
10:9,10,12 11:2,24  
12:5 13:4,10,14  
14:10,18 17:22 18:1  
19:23 24:5 28:4,7  
29:15 33:24 36:16  
39:13,13 40:20 41:4  
42:19 47:11 48:25  
63:7 64:14 75:17  
77:17,20 84:17 91:20  
94:7 95:13 97:21  
100:8  
**collision (2)** 81:9,10  
**colour (1)** 71:12  
**come (18)** 4:14 10:7  
13:9 15:15 23:6,17  
26:21 36:10 38:14  
40:8,15,20 43:17  
63:16 64:4 91:19,19  
99:5  
**comes (6)** 8:19 64:11  
81:5 86:7,14 95:6  
**coming (30)** 6:6 12:25  
13:24 17:12 21:24  
22:2 28:17,19 29:23  
42:17 53:21,23 54:15  
56:3 65:8 81:16  
82:12,23 83:3 85:4  
87:24 88:24 89:4 90:9  
92:4,21 97:8,13  
104:14,15  
**command (1)** 68:6  
**commander (2)** 3:5,6  
**commands (4)** 60:18,19  
61:2 94:19  
**commenced (1)** 77:10  
**commissioner (1)** 72:14  
**common (1)** 52:16  
**commotion (1)** 98:15  
**comms (1)** 80:9  
**communicate (2)**  
101:10 102:21  
**communication (2)**  
63:7 98:12  
**communications (1)**  
78:3  
**compared (1)** 74:6  
**completed (2)** 51:11  
77:12  
**completely (1)** 96:14  
**completing (1)** 80:3  
**compliance (1)** 65:20  
**compromise (1)** 102:13  
**computer (1)** 80:1

**concentrated (1)** 7:23  
**concentrating (2)** 64:1  
75:12  
**concentration (1)** 64:12  
**concern (3)** 11:24 23:18  
24:23  
**concerned (8)** 18:17  
19:2,6 29:12,14 32:18  
60:16 103:16  
**condition (5)** 13:25  
39:1 52:5 78:23 79:3  
**conferred (1)** 67:18  
**conferring (2)** 28:15  
68:2  
**confirm (1)** 31:23  
**confront (4)** 7:25 9:12  
55:16 84:14  
**confronted (1)** 12:4  
**connection (1)** 1:20  
**conscious (10)** 14:2  
90:21,23 91:2 94:18  
97:9 100:4 101:25  
102:1,11  
**consider (3)** 71:9,13  
85:19  
**considerable (1)** 24:17  
**consideration (2)** 8:2  
66:15  
**constable (3)** 2:22 32:8  
50:20  
**contact (1)** 93:3  
**contain (2)** 84:12,14  
**contained (1)** 23:14  
**containing (2)** 22:11  
71:25  
**containment (3)**  
22:6,14 103:13  
**contempt (1)** 1:17  
**context (1)** 72:16  
**continue (1)** 93:3  
**continued (6)** 25:2  
90:19,20 101:12,13  
104:4  
**continues (2)** 86:6,17  
**continuing (1)** 25:15  
**continuity (1)** 95:24  
**continuously (1)** 43:11  
**control (3)** 5:1 29:18  
49:1  
**controlled (1)** 20:15  
**conventional (1)** 62:23  
**convinced (1)** 99:7  
**cord (3)** 24:1,1 25:7  
**cordon (5)** 62:21,23  
103:15,15 104:13  
**cords (3)** 12:25 13:24  
23:24  
**corner (14)** 17:10 22:24  
28:10,22 29:11 48:19  
87:15 88:20 89:20,23  
91:19 92:1 98:21  
99:25  
**coroner (26)** 1:4,6,22  
2:1,6,10 26:14,19  
31:2,6,9,12,17 48:8  
50:1,9,14,18 75:25  
76:2,4 99:16,20  
104:22 105:2,13  
**correct (54)** 3:3,7,18,23  
4:12 9:13 10:25 13:13  
16:21,22 17:24 22:25  
26:11 28:5 30:3,16,19  
33:14 34:3,23 40:19

44:9 51:10,13,18,24  
52:19,24 53:10,13,16  
68:4,11,14,21,23  
70:18 73:2,12,20  
74:15 76:12,23  
77:2,8,14 79:18,23  
84:1 88:22  
100:1,19,25 104:9  
**couldnt (7)** 15:12,14  
18:15 22:12 64:2 67:2  
102:21  
**countback (4)** 30:9 49:8  
68:16 69:1  
**counter (8)** 25:25 26:23  
46:20 47:9,22 69:17  
78:11 83:20  
**country (1)** 72:19  
**couple (8)** 12:25 23:23  
27:11 46:16 47:16  
61:7,17 93:24  
**course (9)** 3:5 31:10  
50:25 51:6 69:1  
74:6,12,19 80:21  
**cover (27)** 11:16 18:16  
19:24 20:3 21:20  
23:1,3 40:16 41:5,20  
42:20 46:12 47:14  
62:5,5,13,15 63:1,3  
64:17 67:20 75:10  
93:4,7,21 99:2 102:15  
**covered (9)** 1:8 8:17  
14:9 20:8 24:15 35:14  
42:24 73:19 96:17  
**covering (26)** 12:5  
13:11 14:11 17:17,23  
19:25 20:7,12 21:5,7  
23:16 28:3 37:9 40:21  
42:22,23,25 43:3,5  
46:25 57:13 64:15  
94:19 96:21 97:1  
102:19  
**crashed (2)** 8:11 80:20  
**crew (1)** 81:21  
**crewed (3)** 3:16 33:3  
51:19  
**critical (2)** 45:23,24  
**cross (1)** 17:15  
**crossed (1)** 102:10  
**crossing (1)** 102:11  
**crouched (2)** 89:13  
100:9  
**crouching (2)** 61:25  
70:22  
**cs (1)** 78:19  
**ct (1)** 83:20  
**ctrelated (2)** 83:12  
84:13  
**cut (1)** 102:24  
**cypher (1)** 61:21

**D**

**d4 (13)** 28:15,23 29:5  
48:23 77:20,24,25  
79:20 80:10 81:19  
86:2 88:9,18  
**danger (2)** 7:2 15:16  
**dark (1)** 94:16  
**darkskinned (1)** 90:8  
**dashboard (5)** 16:10  
37:5 40:2 47:18,21  
**dashcam (10)** 12:2 17:9  
26:16,21,22 39:24

47:7 61:18 69:20  
70:19  
**data (1)** 78:7  
**day (4)** 78:11 79:24  
99:21 105:4  
**days (3)** 44:15 58:5  
72:25  
**dc000149 (2)** 62:7  
72:13  
**dc7181293 (2)** 19:17  
41:12  
**dc7181294 (1)** 41:16  
**dc7181303 (2)** 12:1  
37:4  
**dc7181304 (1)** 13:7  
**dc724811 (1)** 61:19  
**dc724813 (1)** 100:14  
**dc724817 (1)** 69:4  
**dc728383 (1)** 91:10  
**dci (1)** 105:12  
**dead (2)** 63:13,14  
**deal (3)** 7:21 84:20  
97:22  
**dealing (4)** 1:7 57:20  
94:5 102:16  
**death (1)** 74:16  
**decided (1)** 20:6  
**decision (4)** 19:23  
97:19,20,25  
**declaration (3)** 7:7  
34:16 73:10  
**declared (7)** 34:9  
55:1,4,7,13 83:18 84:5  
**deemed (1)** 66:21  
**defend (1)** 84:17  
**definitely (2)** 70:24  
83:12  
**deflection (1)** 85:20  
**degrees (2)** 65:9 89:24  
**dekit (2)** 4:7 80:4  
**dekkited (1)** 79:21  
**dekkitting (1)** 4:8  
**delegated (1)** 29:21  
**deliver (4)** 79:11,12  
85:16,25  
**deploy (3)** 54:14 87:23  
91:20  
**deployed (4)** 3:1 57:4,8  
77:16  
**deploying (1)** 91:18  
**describe (12)** 8:25 44:7  
84:18 86:15 89:22  
91:11 92:22  
93:11,14,17 94:17  
97:5  
**described (7)** 9:6 16:11  
17:7 27:17 29:1 41:9  
96:11  
**describing (4)** 20:13,23  
58:22 90:16  
**detail (2)** 6:13 95:8  
**details (2)** 5:18 6:9  
**determine (2)** 30:10  
49:9  
**detonate (8)** 24:3 38:4  
60:7 62:6,19 64:24  
75:15 95:21  
**detonated (9)** 14:20  
15:7 18:18 19:7 21:10  
23:9 28:1 65:13 73:3  
**detonating (1)** 25:9  
**developing (2)** 53:19,23  
**device (9)** 44:2 45:25

46:6 64:25 65:13 73:3  
93:18,19 96:9  
**devices (9)** 13:4 38:7  
39:21 62:18 67:14  
74:6,7 77:7 97:10  
**didnt (17)** 4:2 11:22  
14:7 19:10 22:11 23:3  
27:24 29:4,5 45:16  
53:8 61:7 63:14 89:23  
90:4 99:9 102:12  
**died (3)** 15:23 73:7,23  
**different (2)** 52:11  
69:20  
**difficult (6)** 62:9  
71:11,12 97:18,25  
103:2  
**direct (1)** 99:10  
**directed (1)** 55:21  
**direction (2)** 57:10  
100:15  
**directly (6)** 40:10 54:19  
59:17 100:2,4 102:5  
**discharged (4)** 30:10,13  
49:10,12  
**discharging (1)** 17:19  
**discussing (3)** 29:8  
64:14 71:22  
**discussion (2)** 85:7,8  
**dispatch (1)** 82:15  
**disposal (1)** 28:24  
**distance (3)** 75:1,3  
92:22  
**distinctive (2)** 23:24  
48:13  
**distortion (1)** 58:8  
**distracted (1)** 97:2  
**distressed (1)** 35:13  
**docking (1)** 53:4  
**documents (1)** 105:17  
**does (6)** 24:19 27:22  
54:3 79:4 89:19 95:11  
**doesnt (2)** 46:5 92:2  
**doing (14)** 4:1,5,10 11:4  
20:11 39:10 43:25  
60:13 66:23 80:5  
82:11 94:21 98:9  
102:14  
**done (1)** 58:5  
**dont (30)** 5:16 19:5  
20:24 26:12,19 31:20  
39:6 43:8 48:6 49:23  
52:12 60:25 61:3  
65:15,15,21 67:4 72:8  
74:12 82:8,24 84:18  
85:19 89:15 92:18  
95:20 99:1 103:23  
104:21 105:3  
**door (14)** 15:3,1 22:19  
42:1,2 58:2,4,9,13  
61:21 64:5 70:17  
71:19 102:2  
**dot (1)** 98:6  
**doubt (6)** 37:23 84:6  
96:4,5,8 97:14  
**down (27)** 6:11 9:5,7  
21:24 22:2 24:13,20  
34:22 37:2 43:8  
44:8,13 58:23 70:20  
74:2 76:6 85:9,12  
88:12 89:13 91:1,12  
92:9 94:1 97:24  
100:16 104:19  
**dragon (1)** 104:19

**drawn (2)** 59:16 89:12  
**dress (1)** 12:22  
**drew (1)** 18:14  
**drive (3)** 6:23 84:25  
85:2  
**driver (16)** 3:19 9:14  
11:16,17,17 33:6  
35:21,23 51:16 52:15  
54:11,20 57:7  
77:22,24 79:19  
**drivers (3)** 58:2,9 70:9  
**driving (2)** 6:25 77:25  
**drop (2)** 59:16 78:21  
**drove (2)** 60:10 88:10  
**due (4)** 5:3 7:12 23:4  
53:24  
**during (10)** 31:11 47:16  
49:6,19 64:7 68:12  
72:12 79:25 81:3  
104:10  
**duty (5)** 3:8 8:2,3 32:21  
81:3

**E**

**easily (16)** 2:4 3:17,19  
9:14 13:10 20:1 25:21  
33:4,6 50:9,12,13,23  
61:21 72:14 106:7  
**e59 (7)** 21:25 25:22  
77:20,25 80:12 83:4  
96:21  
**ear (1)** 6:2  
**earlier (1)** 48:18  
**earpiece (1)** 54:22  
**ears (1)** 6:2  
**easily (2)** 62:2 81:5  
**east (1)** 87:10  
**easy (1)** 94:8  
**echoes (1)** 99:3  
**effect (6)** 45:8,10,16  
46:8,10 62:19  
**effectively (13)** 54:14  
65:9 66:18 79:13,24  
80:8,17 81:13  
82:11,15,25 93:4  
103:25  
**efforts (2)** 30:25 49:25  
**eight (1)** 12:24  
**either (8)** 13:25 57:8  
79:9 80:12 85:17  
92:23 93:1 97:15  
**el (4)** 99:11 100:3,5,16  
**else (5)** 4:24 20:7 73:17  
93:14 101:4  
**elsewhere (1)** 75:7  
**emergency (1)** 104:13  
**en (5)** 5:22 8:8 34:4,8  
35:4  
**end (8)** 9:22 17:16  
47:16 53:3 55:10  
83:15 90:4 99:13  
**endangered (1)** 23:7  
**ended (1)** 25:17  
**ends (1)** 58:19  
**engagement (1)** 49:19  
**engine (6)** 42:10,16  
62:4,12,14 63:3  
**enough (1)** 22:20  
**ensure (1)** 64:16  
**enter (2)** 91:17 92:6  
**entered (4)** 36:17 85:4  
102:8 104:6  
**entering (2)** 91:21 92:3

entire (1) 68:25  
 eotech (3) 24:12,16,20  
 equipment (5) 4:19 5:9  
     51:25 78:15,16  
 escorted (1) 79:25  
 escorting (1) 104:17  
 especially (3) 5:6 15:4  
     18:17  
 essentially (1) 62:3  
 establish (3) 83:1 85:24  
     102:22  
 established (1) 30:17  
 estimate (1) 81:22  
 evacuated (1) 104:16  
 even (6) 15:5 19:11  
     20:14 21:4 83:1 95:24  
 evening (4) 3:8 30:25  
     79:15 105:15  
 event (2) 72:16 105:15  
 events (6) 6:9 16:11  
     25:23 39:23 46:19  
     73:22  
 ever (2) 94:13 101:14  
 everybody (1) 29:7  
 everyone (3) 1:22 15:7  
     96:15  
 everything (6) 4:23  
     28:11 29:13,23 75:23  
     105:19  
 everywhere (1) 87:17  
 evidence (16) 1:16 2:15  
     30:17,24 31:7,11 32:2  
     49:25 51:1,20 72:13  
     75:22 76:14 79:19  
     99:14 104:25  
 exact (2) 80:18,25  
 exactly (16) 10:25  
     22:11,13 37:1 55:22  
     59:24 60:25 61:7  
     64:16 65:15 67:2  
     70:19 71:11 83:1  
     88:15 103:2  
 example (2) 54:21  
     63:20  
 except (1) 70:21  
 exchange (1) 88:6  
 executed (1) 67:24  
 expect (2) 34:18,19  
 expecting (2) 88:7 89:2  
 experts (1) 29:4  
 explain (1) 86:20  
 explaining (1) 95:7  
 explosive (10) 13:4  
     39:21 62:18 67:14  
     71:10 74:10 77:7  
     93:18,18 97:10  
 explosives (4) 29:4  
     48:23 74:12,13  
 exposed (1) 65:7  
 extendable (1) 78:18  
 extra (1) 105:1  
 extreme (1) 65:12  
 extremely (2) 98:25  
     100:6  
 eye (2) 92:24 93:3  
 eyes (1) 6:15

**F**

fabric (1) 16:6  
 face (2) 7:20 42:17  
 faced (1) 84:16  
 faint (3) 47:3,6 48:1  
 fair (1) 11:20

fairly (1) 87:1  
 fallen (3) 92:14 93:2  
     94:23  
 falling (3) 92:18,19 93:1  
 far (16) 10:10 14:23  
     15:20 17:16 18:15  
     22:5 25:12 29:13  
     33:18 49:18 55:10  
     57:16 62:21 75:8  
     86:13 103:9  
 fast (1) 81:13  
 fear (2) 8:23 11:21  
 feared (5) 7:22 14:19  
     60:7 62:5 64:25  
 feed (1) 82:19  
 feel (4) 7:20 23:1.3  
     105:7  
 feeling (2) 81:7 84:7  
 feet (2) 72:16 105:15  
 felt (5) 15:3 18:13  
     23:5,5 98:1  
 few (10) 11:20 16:24  
     40:7 44:15 58:5 59:6  
     72:10,15 76:25 99:12  
 figure (3) 26:1 46:25  
     47:22  
 file (1) 13:8  
 filtering (1) 92:5  
 final (2) 25:15 76:1  
 finally (1) 19:15  
 find (2) 86:1 89:2  
 finger (1) 95:17  
 finish (1) 20:16  
 finishing (1) 82:11  
 fire (18) 24:6 27:21,25  
     44:4,5,21 48:14 52:6  
     66:1,20 69:12 75:18  
     79:9,14 89:18  
     95:17,20 102:11  
 firearm (3) 40:17 52:23  
     56:19  
 firearms (31) 3:5,6 4:11  
     7:12,13 17:19  
     32:13,15 36:3  
     51:11,14 52:2 55:6  
     56:18,22 57:13  
     60:9,11,14,17 61:4  
     64:17 66:23 67:19  
     79:12 80:17 84:11  
     93:4,7,21 97:19  
 fired (38) 16:25  
     24:3,8,9 25:18,21,22  
     26:7,9 27:4,8,13,18  
     30:18 45:7,12,17  
     47:19 49:19 65:2,10  
     66:2,10,11,21 67:7  
     68:22 69:14 70:7 88:1  
     90:23 100:24  
     101:1,2,8,14,19  
     102:12  
 firefight (1) 88:8  
 firing (14) 9:12 30:15  
     48:2 65:3 66:9,24  
     67:1,3,5,8,17,18 99:6  
     101:21  
 first (36) 1:25 4:22  
     12:8,14 16:12,24 18:7  
     19:10,25 24:6,8  
     25:5,24 28:10 40:16  
     45:6,8 59:17,20,25  
     61:12 66:9 67:9,11,15  
     70:5,6 73:14 74:1,1  
     83:2 90:3,5 92:20

93:2,20  
 five (2) 60:14 99:22  
 floor (14) 10:7 12:12  
     13:18 14:1 36:23  
     44:12 46:11 57:21  
     58:11 60:17 89:9  
     92:17 93:23 98:13  
 flying (1) 9:20  
 focus (7) 26:1 40:10  
     47:22 64:4 91:9 94:15  
     96:6  
 focused (5) 7:23 19:3  
     24:14 95:10 103:22  
 focusing (6) 20:9 48:12  
     64:6,8 94:20,21  
 follow (2) 17:25 40:24  
 following (1) 68:20  
 foot (5) 57:4 59:22,24  
     70:23 91:17  
 footage (24) 12:2,3  
     16:9 25:24  
     26:17,17,21,22  
     27:15,18 28:2  
     39:23,24 41:3 46:19  
     47:7,18,21 48:2,18  
     61:18 69:16 99:16,19  
 force (4) 21:6 74:10  
     76:21,24  
 fork (1) 86:18  
 form (3) 1:9 18:16  
     72:16  
 forward (14) 10:8 11:18  
     13:9 29:18 47:8  
     57:12,16 58:2,10,23  
     67:15,24 68:6 70:10  
 four (2) 1:11 60:14  
 frame (1) 64:11  
 free (1) 105:7  
 fresher (1) 44:16  
 friday (2) 79:19 105:14  
 front (33) 2:7 11:25  
     18:7 22:24 31:18  
     33:10,11 40:10  
     57:15,17,24,24  
     58:3,7,12,15,22  
     59:7,10 60:9 61:21  
     62:2 64:5 70:11,11  
     76:18 77:23 78:2 91:8  
     92:15,25 93:8 103:6  
 fruit (5) 10:15,17,19,23  
     17:13  
 frustrating (1) 102:20  
 fully (1) 91:18  
 fumes (1) 42:16  
 further (38) 5:22 6:22  
     7:6 13:18 15:14 17:13  
     18:14 21:15 25:4  
     27:8,12 28:3 29:23  
     30:21 34:5 37:1 40:17  
     41:16,17 46:14 49:4  
     67:22 68:8 69:5 72:7  
     75:21 91:13 93:23  
     97:14 98:3 99:13  
     101:11,13  
     102:12,15,18 103:18  
     104:20

**G**

g36 (7) 3:12 24:13  
     78:25 83:6,7 89:7,17  
 gaffer (2) 96:10,13  
 gallery (1) 1:16  
 gave (4) 20:16 51:20  
     68:12,13

general (4) 80:2,9,22  
     88:25  
 generally (3) 14:18 78:3  
     89:9  
 gentleman (1) 8:25  
 genuine (1) 96:9  
 get (42) 1:6 4:25 5:1  
     7:2 8:5 11:9,21 16:17  
     17:22 19:8 20:4 21:20  
     22:6 25:6 34:5 35:16  
     36:19 38:17 39:17  
     40:11 52:21 54:13  
     57:15 58:1,3 60:24,25  
     62:3 65:20 75:8,14  
     82:6,9 87:12 88:17,20  
     91:16 92:17 95:11  
     99:21 102:7 103:12  
 getting (6) 54:21,22  
     58:6 63:1 82:19 104:1  
 gist (1) 80:23  
 give (9) 30:4,6 32:2  
     48:22 49:6 50:25 61:2  
     66:15 76:13  
 given (10) 4:7 28:15  
     35:3 55:5 62:14 67:11  
     68:2 79:20 80:3 84:21  
 gives (4) 24:17  
     85:22,22,23  
 giving (6) 1:16 2:15  
     21:5 60:17 75:22  
     94:19  
 glass (2) 85:15,20  
 glock (9) 3:13 20:2  
     32:25 52:4,9,22 59:14  
     78:21,25  
 goes (1) 105:18  
 going (44) 1:9 5:8,24  
     8:12,14 15:16 16:2,9  
     20:4 26:16 28:11,16  
     29:23 38:3 39:12  
     53:15 57:25 58:7,16  
     60:7 64:24 69:20  
     70:20 74:4 75:6 82:7  
     84:4 85:7,9,14,18,24  
     86:8 88:6,19  
     97:5,20,21 98:3,12  
     99:8,16,18 105:14  
 golden (1) 104:16  
 gone (7) 5:23 12:19  
     15:23 20:6 21:10 30:7  
     58:23  
 good (10) 1:4,5,22 2:6  
     23:1 31:17 50:14 57:1  
     71:1 76:4  
 grapes (3) 29:18 49:1  
     68:6  
 greater (1) 74:9  
 green (4) 10:15,20  
     100:17 104:19  
 ground (2) 3:6 94:22  
 group (1) 53:17  
 guard (1) 79:25  
 guess (1) 65:25  
 gunfight (1) 89:2  
 gunfire (5) 88:6 98:25  
     99:3 101:6,13  
 guns (1) 4:22  
 gunshots (3) 9:18 87:19  
     88:3  
 gut (3) 81:7 84:7 92:20

**H**

hadnt (5) 53:7 61:6  
     101:1,2 102:18

hailing (1) 53:17  
 half (1) 43:20  
 halfway (1) 88:15  
 halt (2) 12:4 36:10  
 hand (6) 29:6 59:14  
     78:15 89:7 102:19,25  
 handcuff (1) 39:12  
 handcuffs (1) 78:18  
 handed (2) 35:4 80:9  
 handgun (2) 3:14,15  
 handheld (4) 78:4,4,5  
     82:17  
 hands (6) 20:25 31:4  
     59:13 60:21 94:23,25  
 happen (2) 75:14 98:18  
 happened (5) 33:22  
     54:2 67:9 85:1 97:15  
 happening (5) 35:23  
     41:24 82:25 97:22  
     98:10  
 happens (1) 70:3  
 hard (3) 55:11 63:1,3  
 hatchings (2) 17:15  
     100:7  
 having (9) 15:4 42:24  
     44:7 59:12 85:6 89:3  
     93:2 101:8,13  
 head (12) 25:3,7,10  
     33:24 45:17,22 55:22  
     81:1 85:7 86:4 88:19  
     92:14  
 headed (1) 34:1  
 heading (1) 34:24  
 hear (19) 6:3 9:16 20:14  
     33:4 34:17,18,19 35:9  
     42:9 53:25 71:22  
     80:14 85:12,13,13  
     87:18 90:4 98:9,11  
 heard (27) 7:7,8 9:9,18  
     22:8 24:16 33:4,16  
     34:1,10,15 35:6 42:15  
     51:2 52:9 53:6,17  
     72:18 73:17 74:18  
     76:15 79:19 81:1  
     100:12,13,23 101:4  
 hearing (2) 9:6 81:23  
 heckler (1) 83:6  
 hed (2) 9:1 94:23  
 heightened (1) 81:4  
 held (6) 18:12  
     28:10,14,21 29:20,25  
 help (8) 31:19 42:4  
     50:15 76:6 86:19  
     91:10 104:7,9  
 helped (1) 104:6  
 here (12) 26:24 31:20  
     32:2 46:22 50:25  
     76:13 84:16 87:22,23  
     96:3 97:23 98:2  
 hes (6) 23:19 65:8,9  
     93:18 103:6,7  
 hidden (1) 31:20  
 hierarchy (1) 103:6  
 high (14) 8:19 56:1  
     65:12 83:15 84:16  
     85:4 86:5,16,24,25  
     87:3,9,14 88:11  
 himself (4) 43:20  
     44:1,11 65:8  
 hide (1) 104:16  
 hit (1) 4:15  
 hoarding (1) 16:6  
 hold (1) 25:6

holding (2) 29:20  
     104:13  
 holster (2) 59:16 78:21  
 honest (1) 80:10  
 honestly (2) 27:20 38:2  
 hope (1) 1:23  
 horwell (4) 72:9,10  
     75:20 106:9  
 hough (25)  
     1:4,5,9,24,25  
     2:2,11,12 26:12,16,22  
     30:20  
     31:4,7,10,14,15,22,23  
     48:10 49:22 50:3  
     105:9 106:4,6  
 house (1) 68:6  
 houses (1) 74:23  
 however (2) 6:9 35:18  
 humanly (1) 81:13  
 hyperfocused (1) 84:19

---

ic3 (1) 90:8  
 ic4 (2) 90:8 92:14  
 id (6) 14:14 66:21 81:15  
     98:20 100:13 101:9  
 idea (1) 74:6  
 identification (1) 1:15  
 identified (5) 57:21  
     58:11 59:7,25 61:14  
 identify (6) 7:25 39:24  
     55:16 60:2 84:12 90:1  
 identifying (1) 1:19  
 ied (21) 22:4 23:2 25:9  
     40:25 59:18,19 60:1,2  
     65:7 66:16  
     71:18,20,21,23 72:2  
     74:3 75:15 94:6,6,6  
     96:4  
 ieds (19) 7:15 13:3,15  
     14:13,17 18:2,17 19:7  
     23:8 24:3,23 29:8 59:7  
     60:6 62:6 94:14 98:1  
     103:7,10  
 ill (3) 30:21 71:7 105:16  
 im (41) 10:24 16:9  
     31:19,20 54:19 62:3  
     63:19 76:13 80:25  
     82:4 86:20 89:9  
     90:9,11,20,21,22,23  
     91:2,3,3,5,17,21,25  
     92:3,5 93:9,10,24  
     94:5,18  
     95:7,11,19,21,22  
     97:8,20,21 99:21  
 image (24) 10:16 12:14  
     13:8,9 16:17 18:4,10  
     19:17,18 27:14 37:8  
     40:7 41:13 61:20 62:7  
     69:4,11,19 70:4,13,24  
     72:11 74:25 100:20  
 images (3) 37:3 41:17  
     61:17  
 imagine (1) 86:11  
 immediate (4) 9:4 21:8  
     24:4 66:3  
 immediately (4) 9:25  
     10:18 14:16 97:11  
 imminent (1) 24:4  
 importance (1) 54:25  
 important (1) 15:24  
 improvised (5) 13:3  
     67:13 93:17 96:8,9

incapacitate (4) 25:8  
     45:3,4 46:4  
 incident (16) 6:5 30:9  
     32:18 34:9,11 52:18  
     53:20 55:2 58:6 68:20  
     78:7,9 82:6 83:20,20  
     84:6  
 incidents (1) 5:4  
 include (1) 77:6  
 included (1) 7:14  
 including (2) 15:7 96:20  
 increased (2) 85:22,23  
 index (1) 106:1  
 indicated (1) 5:8  
 indicating (2) 39:11  
     43:22  
 indicator (1) 71:1  
 individual (2) 45:5,7  
 individuals (1) 14:9  
 influence (1) 73:23  
 inform (1) 38:13  
 information (15) 1:19  
     5:23 8:6 28:23 48:22  
     53:21 54:15  
     80:17,19,24 81:5  
     82:6,16 83:3 104:10  
 informed (3) 5:25 8:10  
     20:7  
 initial (12) 24:6 25:1  
     30:6 60:16 68:12  
     80:11,14,23 86:3  
     92:20 101:16,16  
 initially (10) 41:13  
     42:24 58:24 65:7  
     80:15 83:3 87:25  
     89:13 91:6 101:22  
 initiative (2) 5:2,3  
 injured (10) 4:16 5:6  
     6:14 8:2 73:7,19 80:21  
     103:5,8,21  
 injury (1) 74:16  
 innocent (1) 8:4  
 inquests (5) 1:20 2:13  
     31:25 50:23 76:11  
 inside (3) 15:3,20 42:6  
 instantly (1) 13:3  
 instead (1) 58:16  
 instruction (1) 5:1  
 instructions (2) 19:14  
     21:5  
 instructor (1) 32:15  
 intelligence (1) 53:21  
 interaction (1) 102:20  
 interconnected (2)  
     96:10,14  
 into (48) 2:7  
     4:19,20,21,24  
     8:1,12,19 9:14,22  
     12:11 17:1 35:23 36:1  
     40:4,15 42:17 55:24  
     56:2,6,15 60:10 72:16  
     76:22 78:6 79:2  
     81:12,16 88:5,12,23  
     89:21,21 90:25 91:3  
     93:9,21 95:20  
     98:2,4,8,14  
     101:12,13,17  
     104:7,15,17  
 invitation (1) 99:20  
 ipad (1) 62:1  
 issued (2) 32:23 53:7  
 its (35) 14:14 16:23  
     24:16 26:14,19 34:17

45:23 50:9 52:6,16  
55:6,11 62:7 70:20,22  
71:1,11 72:13 75:1  
83:1 84:2,13,18  
85:14,15,21 87:4,18  
88:15 89:8 92:25  
95:25 96:2 99:1 103:8  
itself (7) 55:23 89:25  
92:11 95:20 97:8  
98:15,17  
ive (33) 7:24 10:7  
11:15,17 12:16,18,19  
21:17 22:3,6,19 25:2  
56:17,17,20  
58:9,10,10,23,23  
59:16 65:10 72:7,10  
93:4,7,10,22  
97:12,19,20,23 98:2

**J**

january (1) 77:12  
job (2) 23:15 34:9  
join (2) 2:24 32:11  
joined (1) 76:21  
jolley (1) 105:12  
journey (2) 34:2,25  
july (2) 1:1 105:24  
junction (8) 8:20,22  
35:18 86:5,24  
87:7,8,14  
june (12) 2:17,20 3:4,8  
32:4,6 51:2,9,16 53:11  
76:15 77:15  
jury (10) 1:3,6,21  
50:4,11 79:19 99:21  
101:18 105:2,8  
jurus (1) 105:17

**K**

kb (2) 38:23 42:23  
keep (2) 18:4 20:25  
keeping (1) 23:14  
kept (3) 44:6 47:14  
105:17  
khuram (7) 46:25  
47:17,23,25 48:7,12  
49:20  
killed (2) 15:7 38:5  
killing (1) 9:3  
kind (3) 43:20 44:19  
45:25  
kiosk (3) 99:10,25  
100:15  
kit (7) 4:8,20,22,22  
33:15 80:9 82:11  
knew (11) 7:1,24 9:3  
15:22 23:2,12 24:14  
55:19 73:9 102:8,9  
knives (1) 7:15  
knocked (2) 5:7 6:14  
knocking (1) 6:10  
know (39) 1:7 8:17 11:6  
12:7 15:16 18:17 19:5  
21:7 22:8 26:12  
28:13,18 29:12 48:6  
49:23 51:20 57:5  
61:7,17 63:14 69:12  
72:8,21 81:24  
82:8,21,24 83:24  
84:18 85:15,20,25  
89:15 95:8,12,16 99:1  
103:23 104:21

knowing (2) 21:4 84:9  
knowledge (1) 73:13  
known (4) 2:13 31:24  
50:23 76:10  
koch (1) 83:6

**L**

labelled (1) 61:20  
lambeth (8) 3:22 5:12  
6:23 32:21 33:13  
53:12,22 79:16  
large (1) 100:6  
las (1) 104:17  
last (8) 1:10 3:14 31:8  
38:3 57:7 71:7 76:25  
79:19  
later (8) 6:21 9:23  
12:10 28:13 32:15  
61:8 68:13 105:3  
lawyers (1) 2:3  
laying (3) 12:12 22:5  
23:19  
laymans (1) 79:7  
lead (1) 1:15  
leading (1) 99:10  
least (3) 75:4 96:19  
105:19  
leave (5) 14:25 15:3  
54:4 85:21 97:21  
leaving (1) 73:6  
left (28) 8:18 10:19  
12:7 16:20 17:9 19:22  
21:18 25:20 27:14  
35:19 40:4 47:1 54:9  
56:1,6 62:17  
63:21,23,25  
64:1,13,19,21,23  
75:13 82:10 86:18  
88:9  
left-hand (27) 12:9,13  
16:5 18:9,11 19:20  
22:17 26:10 39:7  
40:11 46:24 57:9,24  
59:11 61:5,14,16 63:6  
64:8 69:22 70:15,23  
72:2 86:8,11 96:22  
100:18  
leg (8) 27:1,2,7,8,9  
59:16 78:21,22  
legs (2) 21:2 26:2  
leman (1) 49:4  
less (5) 85:14 103:20,20  
104:1,14  
lets (1) 64:4  
level (1) 81:4  
licensed (1) 77:3  
life (7) 7:22 24:4 60:8  
62:20 64:25 75:16  
79:25  
lifted (1) 23:21  
light (1) 54:1  
lights (4) 5:20 34:1 54:5  
82:3  
lightskinned (1) 90:8  
like (23) 7:14 9:1,20  
16:6 24:1,1,24  
37:16,20,21 39:3 48:6  
61:7,25 71:8,13 73:21  
83:19 85:19 92:2  
96:2,12 102:24  
liked (1) 62:22  
likely (6) 7:16,20 45:20  
62:19 70:5 81:8

likes (1) 98:3  
limited (4) 41:5 62:13  
66:17 73:13  
line (1) 99:10  
lines (3) 10:24 60:20  
80:19  
link (1) 6:5  
listen (2) 14:6 34:8  
listening (4) 19:10  
54:18,20 105:10  
literally (8) 4:19,24 6:3  
11:15,17 12:17 22:4  
81:17  
little (9) 16:2,13 17:4  
18:14 38:11 44:16  
81:15,16 105:3  
live (2) 34:19 82:19  
lives (2) 23:7 74:20  
load (1) 97:7  
loading (3) 52:4 59:14  
79:7  
locate (3) 7:25 55:16  
84:12  
location (10) 6:22 7:1  
54:4,21 55:21 66:16  
67:22 68:9 71:10  
83:25  
locations (1) 104:5  
london (26) 3:25 4:4,15  
6:11,19,20 8:10,12  
17:15 33:21 34:24  
35:15 40:9 53:15  
54:1,10 55:18,23  
72:25 73:15 78:11  
80:20 82:16 86:6  
88:12 104:6  
long (7) 6:23 57:18 59:5  
81:2,22 82:8,9  
longer (1) 18:13  
look (34) 10:16 12:1,19  
13:17,21 25:23  
26:16,24 27:22  
37:3,13,20 39:23  
46:19 47:21 57:1  
59:3,5 61:17,19 62:7  
69:16,21 74:25 82:24  
86:22 87:3 88:13,17  
90:17 92:2 96:6 99:18  
100:14  
looked (8) 9:1 12:18  
35:21 37:16 39:3  
58:23 74:2 83:19  
looking (16) 11:18,23  
12:14,21 14:3,3 15:18  
24:13,20 41:4 45:19  
64:9 69:4 92:8 98:5  
102:5  
looks (2) 61:25 92:2  
loose (1) 7:17  
lorry (1) 4:14  
loss (2) 62:20 75:16  
lot (17) 4:20 6:3,6 7:24  
10:3 15:5 17:9 18:13  
28:18 35:13,13 82:21  
88:3,24 96:10  
98:14,15  
lots (1) 35:11  
loud (3) 88:3 98:25 99:4  
low (4) 62:3 89:8,24  
93:5  
lower (3) 13:9 70:20  
91:12  
lying (1) 65:7

**M**

magazine (1) 68:19  
magnification (1) 24:17  
main (8) 8:3 11:24  
48:19 70:1 82:14 91:8  
96:12 104:18  
maintain (5) 41:20  
46:12 90:6 93:3,7  
makes (2) 91:19 92:6  
making (8) 6:20  
20:13,17 21:11,18  
43:13 79:5,5  
male (13) 43:20 46:11  
89:12 90:8,8 91:22  
92:13,13,13,14 94:16  
102:1,20  
males (1) 36:23  
man (6) 13:17 23:16  
40:21 42:24,25 43:13  
manchester (6)  
73:1,4,22,24 74:5,7  
manner (2) 89:13,22  
many (21) 7:2 23:7  
24:6 30:10,13 36:16  
49:12 56:16 66:1 67:1  
73:21,23 74:22 88:1,1  
92:2 94:11,14 96:17  
103:19,23  
map (6) 86:19  
87:3,11,15 88:14 98:5  
maps (1) 77:25  
marauding (3) 7:11  
34:20 55:6  
march (1) 72:21  
marked (6) 12:21 26:1  
41:14 86:25 91:11  
100:16  
market (35) 2:17 3:25  
4:4 6:24 8:18 22:1  
32:3 35:7,11 55:18,24  
83:13,14,24 90:25  
92:11,11  
97:8,14,15,22  
98:2,8,14,15,17,21  
99:2,4 101:12,13  
102:9 103:17,19,19  
marketplace (1) 98:4  
mass (5) 24:22 44:25  
45:14 66:14 93:6  
matter (7) 1:20 7:4  
57:19 59:6 81:24  
95:9,25  
matters (1) 105:6  
maximise (1) 74:16  
maximum (2) 81:25  
85:12  
maybe (3) 55:11 70:23  
101:3  
mex (4) 32:25 33:1 35:5  
52:14  
mean (16) 4:23 6:25  
7:9 26:14 54:3 55:4  
62:3,13 79:4 81:2 83:8  
89:19 95:6 96:7 97:4  
98:11  
meant (2) 7:8 103:3  
measures (2) 1:13  
105:12  
medic (1) 51:14  
members (19) 14:24  
15:8 18:19 23:13 24:5  
28:19 50:4 61:15  
75:16 93:25,25 94:2

95:12 97:10,16,23  
101:23,25 105:2  
memory (2) 44:15 93:12  
men (1) 14:1  
mentioned (1) 105:14  
message (1) 83:12  
met (8) 76:22 77:1  
90:18 91:12,18 93:8  
98:7 100:18  
metres (12) 10:22  
15:12 56:12,21 57:17  
58:10 59:4,4 62:24  
75:2,4 102:6  
metropolitan (8)  
2:12,22 31:24 32:9  
50:20 51:8 72:15  
76:10  
microphone (4) 2:7  
31:18 50:15 76:5  
middle (9) 36:6  
56:18,23 86:23 87:13  
98:8,20,24 100:2  
midmorning (2) 31:5  
50:4  
midway (1) 31:13  
might (7) 2:8 62:1  
73:17 75:14 84:13  
86:12 99:23  
mind (25) 34:15 35:20  
37:23 38:1 55:14  
74:21 81:7 84:6,15,19  
87:6 88:4,6 89:1  
99:9,10,13,19,21  
96:5,8,14 97:24 99:4  
103:6  
minimise (1) 104:2  
minute (1) 95:7  
minutes (12) 6:25 7:4  
22:18 34:2 40:24  
43:17 46:16 47:16  
55:11 81:24 99:12,22  
59:21 60:4 65:5,20,23  
75:10,11,22,25  
85:12,13,16,18 86:20  
90:6 92:23 96:6  
104:2,20,22 105:13,16  
mudlark (1) 104:19  
multiple (2) 7:17 45:5  
must (2) 58:8 72:4  
87:20  
momentarily (2)  
87:13,16  
moments (1) 40:7  
monday (1) 1:1  
monitor (1) 78:10  
monitoring (1) 78:3  
more (25) 6:9 11:13  
16:2,4 17:10 25:16  
27:2 47:7,18 48:9  
54:15 61:10 62:2  
65:19 66:20 81:7,8  
82:6 85:13,18 87:6  
95:10,11,24 96:1  
morning (8) 1:4,5,22  
2:6 31:17 50:14 51:21  
105:6  
moss (18)  
50:9,10,12,19,20 72:7  
75:21 76:1,8,9  
99:12,18,20,23  
104:20,25 106:8,11  
most (6) 15:24 55:1  
70:24 72:12 79:24  
85:25

motion (1) 64:2  
motionless (4) 46:11  
63:12,15 66:22  
mounted (1) 78:20  
move (25) 11:18 13:7  
14:5 19:8 20:24 25:2  
40:12 43:8,13 48:18  
57:16,23 58:2,12  
63:21,24 67:24 75:13  
85:17 91:22 92:7,10  
99:24 100:2 101:16  
moved (19) 10:8 21:17  
22:19 23:5,6 38:21  
39:25 48:25 51:12  
57:12,17 58:10,15  
67:25 76:22 77:13  
93:5,7 98:13  
movement (23) 21:8  
23:17,20 25:4,14,16  
26:8 43:15,22 45:9  
46:14 47:17  
63:16,22,25 64:7,21  
69:23 70:1,1,6,6 92:23  
movements (9) 25:2  
14:4,6,8 20:25  
21:2,3,11,15 26:3,6  
27:2,2,3,7,8,9,12,12,24  
43:14 47:4,6,25 48:13  
95:3  
moving (30) 18:25  
19:19 21:18 24:9  
27:21 28:17 38:10  
39:5,8 41:8 43:9 48:7  
63:10 65:5 66:10,11  
83:10,13,24 85:13  
92:16 94:4  
95:1,2,2,4,17 98:2,16  
102:25  
mp00061 (1) 86:22  
much (28) 30:20,24  
31:2 49:22,24 50:1  
59:21 60:4 65:5,20,23  
75:10,11,22,25  
85:12,13,16,18 86:20  
90:6 92:23 96:6  
104:2,20,22 105:13,16  
mudlark (1) 104:19  
multiple (2) 7:17 45:5  
must (2) 58:8 72:4  
87:20  
myself (3) 19:22 67:25  
94:2

**N**

name (1) 55:5  
names (2) 1:13,18  
narrative (1) 52:21  
nature (2) 17:5 25:4  
near (10) 16:2 22:20  
29:17 36:6 46:25  
47:23 48:20 56:10  
80:12 93:23  
nearer (1) 94:20  
nearest (1) 94:16  
nearly (1) 69:11  
nearside (10) 18:8  
22:24 38:20 57:24  
58:7 59:10 85:6  
86:7,14 96:23  
necessary (1) 9:11  
need (9) 2:8 5:16 26:21  
51:5 76:19 79:14  
87:22 97:12 105:3

needed (6) 14:19 27:21  
35:16 80:2 102:15  
103:13  
negative (1) 77:23  
neutralise (2) 8:1 84:12  
neutralised (1) 55:17  
never (3) 34:18,18,21  
next (13) 3:16 13:7  
15:1,1 18:5 20:1 25:1  
33:4 41:16 50:9 57:3  
59:21 83:9  
nice (1) 1:22  
night (4) 9:23 49:25  
73:25 75:23  
noise (4) 97:4,5,13 99:3  
none (2) 49:16,17  
nonfirearms (1) 61:12  
normally (1) 4:20  
north (6) 6:1,7 86:15  
87:1,7 88:14  
northeast (1) 87:4  
notable (1) 9:17  
notes (1) 5:15  
noteworthy (1) 93:14  
notice (5) 12:22 21:15  
37:15 38:21,25  
noticed (8) 14:13 18:1  
22:3 38:23 40:25  
43:15 61:6,15  
notified (2) 14:14,15  
november (2) 1:10 77:9  
number (13) 7:4 34:2  
43:17 49:9 69:74 74:18  
80:20 90:25 97:1  
102:9 103:7 104:12,16

**O**

objective (4) 8:4  
84:10,11 86:3  
obstruction (2) 71:5  
85:14  
obvious (2) 39:18 46:2  
obviously (9) 53:22  
59:6 62:5 70:10,19  
89:6 92:21 95:19 97:6  
occasions (1) 74:18  
occurring (1) 103:17  
oclock (4) 3:24 79:15  
99:14 105:6  
offer (1) 102:15  
offering (1) 75:10  
officer (38) 2:12 3:1,9  
12:16 18:24 19:2  
25:22 26:18 31:2,7,23  
32:13,18 41:7 42:10  
50:1,14,20  
56:18,22,24 57:13  
60:9 61:21 67:20  
69:21 71:17 72:7  
75:21,25 76:5,9  
77:4,10 83:11 84:9  
104:23,25  
officers (63) 1:19 9:10  
10:5 11:14 16:12  
17:17 21:16,17 23:10  
24:15,16 25:19,20  
28:18,24 35:12,22  
36:3,17,25 37:8 39:8  
40:9 42:15 46:17,24  
48:23 51:19 52:9 53:6  
55:16 60:11,14  
61:4,9,11,12,13,16  
66:23,24

67:1,7,9,19,23 69:6  
71:24 73:21 74:19  
75:1 90:21 94:18  
95:23 96:17,25 97:1  
98:12 99:6 101:19,20  
102:10,15  
offside (5) 11:12 78:1  
83:17 96:24 100:7  
okay (2) 5:17 64:4  
oli (2) 16:15 39:25  
once (10) 10:7 29:21  
37:3 57:20 59:24  
60:11 61:8,14 74:2  
101:11  
ongoing (3) 97:15  
102:23 103:4  
onto (1) 92:21  
op (6) 6:21 7:11,24  
83:18 84:5,24  
open (1) 94:25  
opened (4) 44:4,5,21  
75:18  
opening (1) 21:25  
operating (1) 78:7  
operation (13) 7:7  
34:11,16,21 49:2  
55:2,3,5,8,13  
84:2,11  
operational (1) 3:5  
operator (4) 33:9 34:8  
77:23 78:2  
operators (1) 34:4  
opportunity (1) 85:24  
ops (4) 34:8 81:12  
82:14,19  
oral (1) 20:16  
order (4) 2:3 9:10 55:17  
57:5  
orders (1) 1:10  
ordinary (1) 92:25  
ordnance (1) 28:24  
orientate (1) 16:19  
originally (2) 86:8 98:23  
oshu (1) 80:16  
others (13) 7:8 9:3,9  
30:21 49:23 65:3,11  
67:25 68:1 71:22,22  
72:8 104:21  
ourselves (2) 16:19  
90:23  
outside (5) 17:5 36:7  
42:23 43:1 103:8  
outstanding (2) 28:12  
103:24  
over (38) 4:10 5:7,23  
6:3,6,14 10:6 11:2,5  
12:5,7,9,16,17,18,19  
13:5 14:5 16:7 17:14  
19:12,20 22:20 27:14  
29:6,15 33:16 34:5  
37:9,12 40:12 42:24  
46:12,24 70:22 80:9  
82:12 96:25  
overt (3) 21:3,8,11  
own (2) 5:2,3

**P**

packages (5) 12:24  
13:22 16:8 29:1 37:21  
packaging (1) 39:3  
packed (1) 13:23  
packets (2) 13:1 29:1  
padella (1) 88:15

painted (1) 9:1  
palace (1) 72:23  
panic (4) 8:23 35:13  
87:18 88:25  
panlondon (1) 79:23  
paramount (1) 74:20  
parked (3) 88:10,13  
98:23  
part (13) 2:16 23:15  
24:20 32:3 44:21,24  
49:8 52:21 66:18  
68:15 100:2 101:4  
103:25  
particular (8) 8:24  
43:11,15,16 44:24  
45:22 54:24,25  
particularly (3) 24:14  
45:24 60:23  
parties (1) 8:4  
parts (2) 8:2 65:6  
pass (2) 26:20 91:2  
passed (12) 3:4  
11:15,17 19:13 29:3,5  
65:23 80:18 82:17  
83:4 91:5,6  
passenger (15) 4:21 5:9  
33:10,11 36:20 38:20  
40:12 58:4,12 61:21  
64:5 69:6 70:12,17  
71:19  
passing (1) 83:16  
past (7) 9:20 11:17 77:3  
86:13 91:4 92:9 98:1  
pastor (4) 99:11  
100:3,5,16  
pathway (1) 22:2  
patrols (3) 78:12,14  
79:24  
pause (13) 16:17  
17:2,4,21 18:4 26:24  
27:13 40:6,15 41:3  
46:22 47:14 69:25  
paused (4) 66:9  
87:13,15,20  
pauses (2) 66:4,5  
pausing (1) 66:7  
pavement (6)  
88:9,14,18 90:18 91:1  
92:9,15 100:7  
paving (1) 96:13  
pc (3) 18:24 19:19 41:8  
pedestrians (3) 80:21  
92:2,4  
people (55) 4:15,16,16  
5:6,6 6:10,13,14,15  
7:2,2 8:7,9,22 9:3  
10:3 11:20 15:2,18  
17:5,6 18:20 22:11  
23:4 28:17 29:20  
35:11,14,14 38:4,7,14  
64:10 67:3,5 73:6,7,23  
83:10 87:17 88:1,24  
90:9 92:5 98:16,16  
103:5,8,19,20,21  
104:1,14,15,16  
per (1) 10:25  
perception (2) 92:19  
93:12  
perceptual (1) 58:8  
perhaps (4) 26:20  
71:19,22 90:12  
period (3) 26:8 47:16  
104:11

peripheral (2) 21:16  
92:5  
periphery (2) 90:9 92:5  
permission (1) 79:20  
person (9) 8:24 42:3  
45:25 64:8,21  
90:13,16 93:22 104:12  
personal (5) 38:15,16  
51:25 78:14,16  
personally (3) 29:6,6  
52:3  
personborne (4)  
59:18,19 74:3 93:17  
perspective (3) 18:9  
62:10 71:1  
pertinent (1) 55:1  
ph04201 (1) 88:17  
ph04211 (2) 9:21 36:2  
ph04241 (1) 10:16  
photo (2) 90:17 98:22  
photograph (6) 9:23  
36:1,15 88:17 90:24  
91:13  
photographs (1) 16:1  
pick (2) 91:7 105:5  
picture (1) 92:1  
piece (1) 6:2  
pillar (4) 100:6,9,17  
101:7  
pillars (1) 10:20  
pinpoint (1) 6:17  
pip (1) 30:1  
pistol (4) 52:4,22 59:14  
68:19  
place (2) 49:9 62:21  
placement (2) 66:13  
85:18  
plan (1) 67:24  
planning (1) 91:23  
plato (18) 6:21  
7:7,11,24  
34:9,11,16,21  
55:2,3,5,8,13 73:10  
83:18 84:3,5,24  
play (16) 16:9  
17:2,12,19 18:2,22  
27:4 40:1,4,13 41:1  
47:4,10,11 48:2,10  
played (17) 16:16  
17:3,20 18:3,23 26:4  
27:6 32:3 40:5,14 41:2  
47:5,13 48:4,11 69:24  
71:16  
pleasant (1) 1:23  
please (40) 2:6 9:21  
16:15 17:2,19 18:2,22  
19:16 25:24 26:23  
27:5 31:15,17 39:25  
40:4,13 41:1,12,16  
46:20,20,22  
47:4,9,9,12,21  
48:3,5,10,10 50:14  
69:17 72:11 76:4  
88:17 91:10 100:14  
105:6,7  
plural (1) 58:21  
plus (1) 15:12  
pm (6) 3:21 4:3 51:23  
53:11,11 105:22  
pod (4) 4:6 53:22 54:23  
82:24  
pointed (4) 35:21 59:17  
63:8 72:1

pointing (9) 9:2 11:6,18  
35:22 56:19 85:22  
89:9,14 93:6  
police (40)  
2:12,16,22,22,24 3:21  
10:5,14 28:18 31:24  
32:8,9,11 35:12 36:16  
40:9,9 49:5 50:21 51:8  
60:21 61:15 72:15  
74:19,25 76:10,21,24  
77:1,4 83:16 88:4  
90:18,22 91:14 95:13  
99:6 100:8 101:21  
102:9  
policing (1) 82:15  
port (1) 89:8  
pose (1) 23:9  
posed (1) 66:6  
position (32) 18:5 19:18  
22:16 26:9,18 27:15  
35:16 36:14 38:21  
41:13,23 43:21 46:17  
47:4,6 49:1 57:18 58:3  
59:15 66:16  
70:12,16,21 71:15  
79:8 89:8,24 90:1  
93:9,5 103:11,13  
positioned (4) 41:20  
46:24 69:8 76:5  
positions (4) 15:25  
23:11 28:4 29:15  
positive (1) 8:3  
possible (17) 4:25 5:2  
7:1,3 11:19 19:9 29:24  
62:4 71:9 75:6,8 81:14  
82:20 90:7 103:10,20  
104:2  
possibly (8) 4:15  
5:5,5,25 6:8,11 8:8  
28:12  
postincident (3) 30:2  
49:5 68:9  
potential (2) 6:18 15:9  
potentially (1) 84:16  
pr (2) 38:13,15  
practicable (1) 62:24  
practice (3) 9:9 52:5,16  
precise (2) 20:21,22  
prefer (1) 99:21  
prepare (1) 84:24  
prepping (3) 81:13,21  
82:11  
presence (2) 1:21 50:11  
present (1) 37:9  
presented (1) 89:25  
press (1) 1:7  
pressup (1) 43:21  
presumably (3) 44:15  
54:16 61:5  
pretty (4) 11:1 59:21  
60:4 81:20  
prevent (1) 103:25  
previous (1) 5:4  
previously (1) 92:16  
primarily (2) 40:21  
53:22  
primary (14) 3:12 20:5  
30:11 35:2,3,4 49:14  
52:11 54:13 78:23  
79:1 83:4 85:21 89:6  
prior (2) 9:18 81:16  
priority (2) 54:11,20  
probably (17) 10:22,24

14:14 18:12 31:13  
38:2,4 44:6 57:7 62:8  
86:20 90:11 95:8  
98:21 100:6 102:6  
104:18  
problem (1) 14:24  
procedure (6) 30:2,4  
49:5,8 68:9,15  
process (5) 4:6,8 33:15  
40:20,24  
41:7,11,16,20,23  
42:1,3,5,7,9,13,15,19,22,24  
43:3,5,7,9,11,13,17,19,22,25  
44:3,5,7,10,18,21,24  
45:1,3,5,8,11,13,15,19,22,24  
46:2,5,8,10,12,14,16,19  
47:3,21  
48:16,20,22,25  
49:4,8,12,14,16,18  
50:23,25  
51:4,8,11,14,16,19,23,25  
52:3,9,17,20,25  
53:2,6,11,14,17,19,25  
54:3,5,7,11,15,18,24  
55:3,7,10,13,18,21,24  
56:3,6,8,10,14,16,22,25  
57:3,5,10,15,18,23,25  
58:12,15,18,21  
59:1,3,5,9,12,15,19,22  
60:2,6,9,13,19,22  
61:2,4,9,12,17,25  
62:7,12,18,21  
63:1,5,10,13,16,18,22  
64:4,14,18,21  
65:1,3,5,11,14,17,23  
66:1,3,7,12,15,20,23  
67:1,3,5,9,12,17,22  
68:1,5,8,12,15,18,22,24  
69:4,8,11,16  
70:3,9,15,19 71:4,7,22  
72:3,18,21,25  
73:3,6,9,13,17,21  
74:6,9,12,16,18,25  
75:6,9,12,18  
76:13,17,21,24  
77:3,6,9,12,15,18,20,22,24  
78:2,11,14,23  
79:4,15,19 80:5,14,25  
81:9,11,22 82:3,6  
83:5,19,22 84:2,9,21  
85:10 86:2,11,19,22  
87:5,12,24  
88:1,9,17,23 89:5,17  
90:3,5,13,16,19  
91:10,16,22  
92:7,12,16  
93:11,14,20  
94:11,14,20 95:1,5,15  
96:4,17,20 97:2,16  
98:5,9,18  
100:2,12,14,20,23  
101:1,14,18,23  
102:3,7,15  
103:1,12,22 104:3  
qc (6) 2:11 31:22 72:9  
106:4,6,9  
queens (1) 79:25  
question (3) 1:14 39:18  
99:17  
questions (21) 2:11  
18:5 30:20,22,23  
31:22 49:22,23 50:19  
72:7,9,16 75:21 76:8  
99:13 104:21

**Q**

q (475) 2:15,19,22,24  
3:1,4,8,11,14,16,19,21,24  
4:3,10,13,18  
5:1,8,16,18,22  
6:9,17,23 7:4,6,16,19  
8:6,14,17  
9:6,9,14,16,21  
10:10,16  
11:2,4,9,11,13  
12:1,7,14,21  
13:2,7,14,17,25  
14:9,17,22 15:9,25  
16:9,23 17:12,25  
18:9,22 19:13,16,23  
20:11,20  
21:4,12,15,22  
22:8,10,16,22,24  
23:1,8,16  
24:6,11,16,20  
25:1,4,10,12,18,23  
27:11,17 28:2,6,9,23  
29:7,17  
30:2,4,9,13,15,17

32:2,6,11,13,15,17,21,23  
33:1,3,6,8,10,12,15,18,22,24  
34:1,4,7,10,13,15,20,24  
35:2,6,9,15,18,23  
36:1,6,10,12,14,19,22,25  
37:3,8,13,15,18,20,23  
38:1,4,7,10,12,15,17,19,21,23  
39:5,7,10,13,16,18,23  
40:20,24  
41:7,11,16,20,23  
42:1,3,5,7,9,13,15,19,22,24  
43:3,5,7,9,11,13,17,19,22,25  
44:3,5,7,10,18,21,24  
45:1,3,5,8,11,13,15,19,22,24  
46:2,5,8,10,12,14,16,19  
47:3,21  
48:16,20,22,25  
49:4,8,12,14,16,18  
50:23,25  
51:4,8,11,14,16,19,23,25  
52:3,9,17,20,25  
53:2,6,11,14,17,19,25  
54:3,5,7,11,15,18,24  
55:3,7,10,13,18,21,24  
56:3,6,8,10,14,16,22,25  
57:3,5,10,15,18,23,25  
58:12,15,18,21  
59:1,3,5,9,12,15,19,22  
60:2,6,9,13,19,22  
61:2,4,9,12,17,25  
62:7,12,18,21  
63:1,5,10,13,16,18,22  
64:4,14,18,21  
65:1,3,5,11,14,17,23  
66:1,3,7,12,15,20,23  
67:1,3,5,9,12,17,22  
68:1,5,8,12,15,18,22,24  
69:4,8,11,16  
70:3,9,15,19 71:4,7,22  
72:3,18,21,25  
73:3,6,9,13,17,21  
74:6,9,12,16,18,25  
75:6,9,12,18  
76:13,17,21,24  
77:3,6,9,12,15,18,20,22,24  
78:2,11,14,23  
79:4,15,19 80:5,14,25  
81:9,11,22 82:3,6  
83:5,19,22 84:2,9,21  
85:10 86:2,11,19,22  
87:5,12,24  
88:1,9,17,23 89:5,17  
90:3,5,13,16,19  
91:10,16,22  
92:7,12,16  
93:11,14,20  
94:11,14,20 95:1,5,15  
96:4,17,20 97:2,16  
98:5,9,18  
100:2,12,14,20,23  
101:1,14,18,23  
102:3,7,15  
103:1,12,22 104:3  
qc (6) 2:11 31:22 72:9  
106:4,6,9  
queens (1) 79:25  
question (3) 1:14 39:18  
99:17  
questions (21) 2:11  
18:5 30:20,22,23  
31:22 49:22,23 50:19  
72:7,9,16 75:21 76:8  
99:13 104:21

106:4,6,8,9,11  
quick (5) 27:19  
81:18,24 82:1 102:17  
quickly (14) 4:25 5:2  
6:25 7:3 8:5 19:9 22:3  
24:8 27:23 53:19,24  
31:20 85:1,3  
quite (10) 20:15 34:13  
35:13 48:13 62:13  
71:5 84:15 89:3 90:4  
92:25  
**R**  
radio (15) 5:23 6:17  
33:16 34:5,17  
38:15,16 53:14,25  
54:15 73:9 78:3 79:17  
83:19,23  
radios (6) 4:11 78:4,5,5  
80:8 82:18  
radius (2) 15:10 23:2  
rae (3) 18:24 19:19 41:8  
raising (1) 44:1  
ran (1) 99:7  
rather (1) 21:6  
reach (1) 66:7  
reached (6) 40:6 83:14  
86:4 90:14 98:20,20  
react (1) 64:22  
reaction (1) 92:20  
reading (1) 105:10  
ready (10) 52:6  
79:2,5,14 80:8 82:2  
89:24 90:1 93:5 95:22  
real (9) 16:23 26:25  
29:9 37:24 46:23  
47:24 69:18 94:15  
100:20  
realisation (1) 95:23  
realise (1) 94:4  
realised (5) 7:22 12:11  
18:15 57:19 74:2  
reality (1) 58:9  
really (10) 6:25 8:4  
15:11 17:8 80:10  
81:25 84:18,25  
97:18,25  
rear (8) 4:21 5:8 11:12  
15:4 42:16 52:15  
67:21 77:25  
reason (3) 15:22 45:22  
53:2  
reassessed (5) 24:8  
45:12 66:6,9,21  
reassessing (1) 66:8  
recall (14) 10:20 55:22  
56:24 60:25 61:3  
63:11 65:15,16,21  
67:4,6,6,18 68:15  
recalled (2) 30:15 58:6  
receive (3) 4:10 5:22  
8:6  
received (2) 3:24 4:3  
receiving (1) 80:19  
recent (1) 73:22  
recently (2) 5:9 54:2  
recognised (1) 60:4  
recognition (1) 77:7  
recollection (1) 33:20  
red (4) 13:20 14:12  
20:9,24  
redouane (1) 42:25  
refer (6) 2:20 5:14 32:7  
51:5 76:18 80:16

referred (2) 73:21 78:18  
 referring (1) 68:13  
 reflecting (1) 71:17  
 region (1) 62:23  
 relation (3) 36:25 52:2  
 89:17  
 relative (1) 57:11  
 relatively (2) 3:22 33:12  
 relieved (4) 28:7 46:16  
 47:11 48:17  
 remain (3) 2:6 15:3  
 22:16  
 remained (1) 68:24  
 remember (29) 5:14  
 18:25 20:21,22 33:18  
 37:1 53:25 54:24 55:7  
 60:22 63:15 80:18,25  
 81:1,19  
 82:12,16,17,23  
 83:3,9,11,16 84:25  
 85:6 87:20 89:11,20  
 102:23  
 remove (1) 79:9  
 removing (1) 33:15  
 repeat (1) 105:13  
 repeatedly (2) 44:8,12  
 replaced (1) 67:23  
 reported (1) 104:11  
 reports (2) 29:23 34:5  
 request (2) 33:20 42:9  
 resources (1) 82:15  
 respect (1) 103:14  
 respond (5) 4:18 19:14  
 21:12 42:5 44:3  
 responded (1) 5:19  
 responding (1) 32:3  
 response (24) 2:16  
 3:1,9 5:11 12:15  
 17:16,22 19:20  
 22:17,21 27:9 32:17  
 36:10,19 39:14,16  
 41:5,18 42:11  
 51:12,17 52:15 54:9  
 77:13  
 responsibility (2) 64:18  
 78:2  
 rest (3) 91:19 104:3  
 105:3  
 restaurant (1) 15:1  
 restaurants (1) 74:22  
 restful (1) 1:23  
 retreating (1) 41:4  
 retrieve (1) 105:17  
 return (3) 33:13 72:11  
 101:6  
 returned (1) 3:21  
 righthand (34) 10:12,24  
 13:12 19:5 20:1 23:19  
 36:24 40:21  
 56:11,13,15,19,20  
 57:9,13 58:19 59:1  
 60:3,15 62:16 63:22  
 70:4,22 74:2 89:21  
 90:18 91:1,7 92:1,7,10  
 97:11 98:6 100:10  
 risk (5) 23:10 65:12  
 103:20,21 104:1  
 river (1) 56:3  
 riverside (1) 104:14  
 road (24) 10:10,11  
 13:12 17:17 19:11,19  
 22:12 36:7,17 48:19  
 56:18,23 60:10 61:5

63:6,23 64:9 69:23  
 70:16 81:9,10,23  
 83:15 101:5  
 roles (1) 77:6  
 roll (1) 92:23  
 rolling (1) 93:1  
 roof (1) 99:2  
 room (1) 105:14  
 roughly (1) 71:2  
 round (16) 12:24 13:24  
 23:21 28:10,18,22  
 52:6 57:25 58:7,16  
 89:16,23 90:11 91:19  
 99:5 101:2  
 rounds (7) 30:10  
 49:9,12,19 52:4 68:18  
 69:2  
 route (8) 5:22 6:22 8:8  
 34:4,8 35:4 55:24  
 100:5  
 rr (2) 12:20 26:1  
 rtc (4) 81:6,8,9  
 run (7) 6:4,6 18:20  
 54:1,3 89:23 90:25  
 running (16) 8:23 10:4  
 17:5,10 19:3 35:11  
 87:1,4,10,17 88:25  
 89:12 90:6 91:3 98:16  
 101:15  


---

 S  


---

 safe (7) 4:23 29:14  
 52:14,18 67:15 75:3  
 84:22  
 safely (5) 7:1 54:14  
 103:12 105:18,20  
 safer (3) 15:3,5 103:9  
 safety (7) 15:13 39:21  
 42:7,8 74:20,21 79:9  
 same (15) 13:8 14:14  
 15:24 23:13 25:19  
 29:13 60:4 67:8  
 69:1,16,19 70:3 74:9  
 94:9 99:9  
 sat (3) 71:21 81:15  
 105:2  
 satisfied (2) 90:22  
 101:11  
 saturday (4) 2:17 3:8  
 32:4,21  
 saw (28) 11:2 13:18  
 17:4 25:5 26:6,8 27:15  
 36:3 40:7 47:14,17  
 48:17 49:20 51:1  
 58:24 59:11,17 60:6  
 63:25 70:6,13 71:8,21  
 73:18 75:13 76:14  
 94:13,15  
 saying (12) 6:19 9:3  
 20:11,20 43:3,5  
 82:13,22,24 83:11  
 86:12 87:21  
 scanning (2) 89:9 90:9  
 scenario (3) 34:19  
 62:25 81:2  
 scene (21) 7:6,19  
 9:11,23 12:3 16:1,13  
 17:5 19:9 33:24  
 34:10,13 37:4,6 38:14  
 40:6 61:18,23 74:19  
 84:10 104:18  
 sco19 (3) 53:17,22  
 54:22

scouting (1) 11:23  
 screaming (3) 19:8 97:7  
 98:14  
 screen (25) 9:21  
 16:18,23 18:5  
 19:16,17,18 22:17  
 23:11 26:24,25 27:1  
 28:2 31:20 36:1 40:11  
 41:11,12 47:3,8,23  
 48:12,16 49:20 69:18  
 screened (1) 1:16  
 search (4) 77:4,4  
 104:4,4  
 searches (1) 104:13  
 searching (1) 22:2  
 seat (11) 4:21 5:9 31:17  
 33:8,9 34:4 50:15 76:4  
 77:23 78:2 81:17  
 seated (1) 2:6  
 seating (1) 36:7  
 second (16) 24:9,9 27:7  
 45:12,15 48:5 60:3  
 64:24 66:10 70:3,5  
 93:22 95:7,18 101:2,8  
 secondary (4) 49:16  
 52:10 78:20,23  
 seconds (22) 16:23,24  
 17:18,25 18:13,22  
 19:13 20:6 26:25  
 27:11 40:24 46:23  
 47:24 57:19 59:6  
 61:8,22 65:25 71:8  
 95:9,25,25  
 section (1) 1:17  
 sections (1) 25:23  
 secure (1) 68:8  
 securely (1) 105:18  
 security (2) 79:24 81:4  
 see (129) 1:22 8:20,22  
 9:16,25  
 10:2,5,13,16,17  
 11:7,13,20,24 12:3,16  
 13:8 15:17,18,25  
 16:2,4,7  
 17:1,8,12,13,15,16,21,25  
 18:24 19:17 21:1,1  
 22:1,10,11,11,14,16  
 23:10,22 25:1,14  
 26:2,6,20 27:1,11 29:5  
 35:9,19,22  
 36:6,14,16,22,23  
 37:3,8 39:8 40:10,25  
 41:3,7,13,23,25 43:19  
 46:14  
 47:3,6,7,10,17,25 48:6  
 56:16,22,25 59:19  
 61:9,10,12,20 62:1,8  
 63:16,22,24 64:21  
 66:18 69:5,9,23 70:3  
 71:10,12,14,18 72:3  
 75:1 86:24 87:7  
 90:3,5,13,16,24  
 91:11,12,13,20  
 92:12,13,18 93:2,20  
 94:24 96:7  
 99:12,16,24  
 100:3,14,16 101:14,19  
 seeing (5) 19:6 56:24  
 65:23 94:9,10  
 seem (1) 11:4  
 seemed (1) 14:6  
 seen (18) 12:9 13:14  
 14:15 19:13 28:25

40:20 56:17 58:18  
 62:18 64:2,6 69:19  
 71:2,11 91:23 92:16  
 94:11,14  
 select (1) 79:8  
 selected (1) 95:17  
 selector (1) 89:18  
 self (2) 52:4 59:14  
 send (1) 98:1  
 sense (3) 54:13 91:20  
 92:6  
 sent (1) 49:4  
 sequence (5) 16:10  
 27:17,19 47:19 67:6  
 sergeant (6) 68:2  
 76:9,25 77:1,9 104:20  
 serious (2) 81:6 95:11  
 service (8) 2:13,24  
 31:24 32:11 50:21  
 51:8 76:10 104:6  
 set (3) 5:20 29:19 49:2  
 sets (2) 78:6 82:18  
 setting (2) 5:10,11  
 several (1) 66:24  
 shall (1) 1:18  
 shift (15) 3:11,19,22  
 32:24 33:3,8,12 51:23  
 52:1 53:3 77:18 78:11  
 79:2 80:1 104:3  
 shirt (3) 39:2 41:8,25  
 shooting (3) 65:14,24  
 96:2  
 shop (2) 14:25 17:14  
 shops (2) 23:5 92:11  
 short (6) 10:23 41:7  
 49:4 50:7 99:21 105:4  
 shortage (1) 29:22  
 shorter (1) 31:8  
 shortly (10) 3:4,21 12:3  
 21:22 28:6,6 32:18  
 53:11 79:15 100:23  
 shot (24) 11:8 24:10  
 25:3,10,14,15 27:22  
 45:8,12,15,23,24 46:8  
 65:10  
 66:9,10,11,13,15,21  
 85:17,18,20 95:22  
 shots (46) 16:25  
 24:6,11,12  
 25:1,5,12,18,21,22  
 26:6 27:4,8,13,17  
 30:15 45:5,5,7  
 66:1,2,3,5,12,13,20,24  
 67:6,17,18 69:12,15  
 70:5,7 87:24 89:4  
 100:12,13,23  
 101:1,2,14,19,20,22  
 102:12  
 should (5) 15:11 19:24  
 69:18 79:14 85:21  
 shoulders (1) 24:24  
 shout (1) 44:18  
 shouted (6) 9:6 22:2  
 44:7,12 81:18,19  
 shouting (11) 9:2 14:17  
 15:19 17:7 19:7 39:18  
 43:6 44:6 65:21 94:5  
 97:8  
 shouts (1) 44:18  
 show (2) 16:13 60:20  
 showing (1) 41:17  
 shown (1) 72:12  
 shows (1) 26:17

shrapnel (1) 74:13  
 shuttered (1) 17:14  
 shutters (1) 10:15  
 side (73) 10:11,12,24  
 11:11 12:9,13  
 13:11,12 16:5,7  
 18:9,11 19:5,20 20:1  
 22:7,12,13,17 23:19  
 26:10 36:20,24  
 38:19,20 39:7  
 40:11,12,21 41:18  
 46:24  
 56:11,13,15,20,20  
 57:8,9,14,24 58:19  
 59:1,11 60:3,15  
 61:5,14,16 62:16  
 63:6,23 64:8 69:6,22  
 70:4,9,12,16,22,23  
 72:2 74:2 86:8 90:18  
 91:1,7 92:7,10 96:22  
 97:11 98:6 100:10,18  
 sig (3) 32:25 33:1 35:4  
 sight (3) 24:17,20 72:4  
 sighted (1) 92:20  
 sign (4) 5:14 48:7 51:17  
 77:17  
 signage (1) 63:8  
 signal (2) 102:24 103:1  
 significant (1) 77:6  
 signified (1) 34:20  
 signs (1) 48:1  
 silver (3) 29:1 37:21  
 39:2  
 silverwhite (2) 12:24  
 13:22  
 similar (6) 60:2 62:8  
 70:25 74:4 83:12  
 102:3  
 since (2) 51:9 78:9  
 single (2) 49:19 104:12  
 sir (106) 1:5,25 2:9  
 26:12 31:3,4  
 50:10,17,22 51:15,22  
 52:14 53:1,16 54:17  
 55:20 56:7,17,21 57:2  
 58:14,17,20,23 59:24  
 60:12 61:3,10,24  
 62:11 63:11,14,17  
 64:16,20,25  
 65:4,10,12,15  
 66:17,25 67:4,16,25  
 68:4,7,11,14,17,21  
 69:3,7,10 70:2,8,14  
 71:3,6 72:6,17,20,24  
 73:2,5,8,12,16,20  
 74:8,11,15,17,24  
 75:5,11,19,24  
 76:1,7,12,16,23  
 77:2,11,14,19,21  
 78:13 79:5,18,23 84:1  
 88:22 90:4 99:12,18  
 100:1,19,25  
 104:2,9,17,24 105:1,9  
 sirens (4) 5:20 34:1  
 82:3 97:7  
 sit (5) 27:24 64:23  
 65:5,24 76:6  
 sitting (4) 29:10  
 65:9,22 72:3  
 situ (1) 36:13  
 situation (7) 9:10 18:19  
 20:14 23:12 55:15  
 102:13 103:25

situational (1) 85:23  
 six (1) 12:24  
 sizeable (1) 103:15  
 sized (1) 96:13  
 skip (1) 47:8  
 sleeved (1) 41:7  
 slight (3) 21:2 25:14  
 99:2  
 slightly (11) 2:8 18:7  
 31:8,20 58:2 86:8,18  
 94:23,25 95:2,3  
 sling (1) 83:7  
 slowly (1) 80:4  
 slp (1) 32:25  
 slumped (1) 46:11  
 slung (1) 89:7  
 small (3) 7:4 14:4 34:2  
 smaller (1) 74:9  
 smoke (1) 70:3  
 smoking (1) 36:8  
 solely (1) 64:1  
 someone (7) 12:9,12  
 20:7 22:4 28:12 42:2  
 101:10  
 something (10) 9:4  
 53:15 54:3 60:5 65:18  
 85:25 92:24 96:3 97:2  
 101:4  
 somewhere (1) 62:23  
 soon (4) 22:3 59:21,22  
 84:13  
 sort (25) 7:13 10:3  
 13:22 14:14 15:18  
 18:11 20:17,20  
 23:20,24 24:23 28:25  
 43:7 65:8 69:8 80:22  
 85:3,5 86:18  
 89:8,14,24 93:18  
 94:24 102:24  
 sound (2) 9:20 99:3  
 sounds (1) 98:2  
 south (3) 8:15 56:3 89:8  
 southwark (23)  
 8:9,14,19,24 9:22 10:4  
 16:20 28:21 35:7 40:3  
 48:20 55:9,25 56:2  
 83:10,16 85:5  
 86:7,14,16,22 87:9  
 89:21  
 space (1) 95:8  
 speak (3) 2:7 15:19  
 29:4  
 speaking (2) 20:19  
 22:22  
 speaks (1) 85:3  
 special (2) 1:12 105:12  
 specific (3) 7:13 54:3  
 55:21  
 speculating (1) 81:25  
 speed (1) 83:17  
 spells (2) 70:1,1  
 spent (1) 78:11  
 split (2) 95:7,18  
 spoke (1) 60:9  
 spoken (2) 4:6 68:2  
 spray (1) 78:19  
 sprinting (1) 17:11  
 stab (1) 41:8  
 stadium (1) 73:4  
 stage (3) 26:9 45:6  
 73:13  
 stall (4) 10:15,17,19,23  
 stalls (1) 92:11

standard (1) 9:9  
 standing (10) 10:6 11:5  
 12:5 13:5 14:5 29:11  
 39:7 62:9 71:15,18  
 start (13) 1:7 16:10,15  
 26:5 27:1,7 40:1 64:5  
 67:5 79:2 80:4 91:7  
 94:3  
 started (5) 14:15  
 17:18,22 51:23 99:5  
 starting (2) 18:1 26:2  
 startled (1) 98:25  
 statement (11) 44:7,14  
 45:15,19 52:13 53:19  
 57:25 58:5 68:13  
 89:17 94:17  
 statements (4) 2:19  
 32:6 51:4 76:17  
 station (4) 48:20 49:5  
 53:5 83:16  
 stationary (2) 43:14,16  
 stay (16) 7:23,23  
 15:17,19 39:21  
 43:6,8,8  
 44:6,8,8,12,13 57:18  
 67:22 75:9  
 stayed (2) 15:22 52:17  
 steps (2) 84:23 88:12  
 still (50) 4:23 10:3  
 11:22 12:1,2 18:20  
 19:17 21:5,7,10 22:22  
 24:9 25:6 27:21,23  
 28:11,12,16,17,19  
 29:10,12,14 34:24  
 35:15 37:3,5 38:9 40:7  
 43:6,8 44:6,8,12  
 66:10,11 67:13,19  
 80:7 82:10 90:22  
 95:1,4 99:18,25  
 100:7,15 101:24  
 103:16  
 stomach (1) 94:24  
 stoney (59) 8:17,23  
 9:5,14,22 10:1,2,3  
 16:20,25 17:1,6,13  
 28:22 35:19,21,24  
 36:2,5 40:4 55:10  
 56:2,6,17 73:9,18  
 86:11,13,15 87:1,9  
 88:5,16,19,21,23,25  
 89:4,22 91:17,21  
 92:1,3,21 93:24 97:6  
 98:10,18,19 99:1,6,8  
 101:17,22,23 102:5,10  
 103:22 104:15  
 stool (1) 23:24  
 stop (11) 10:7 25:7  
 48:5 56:8 86:2  
 87:21,21,21,22 88:9  
 91:16  
 stopped (8) 8:11  
 10:21,22 56:9,12,20  
 57:4 63:20  
 straight (10) 11:15  
 24:13 38:14 51:12  
 86:6,9,17 88:10,23  
 91:4  
 straightaway (3) 67:10  
 81:12 82:3  
 strap (1) 23:23  
 strapped (5) 12:24  
 13:24 14:13 16:8 39:3  
 street (106)

8:14,17,19,19,23,24  
 9:2,5,14,22,22  
 10:1,2,3,4 16:20,20,25  
 17:1,6,11,13 18:21  
 22:7 28:21,22  
 35:7,19,21,24 36:2,5  
 37:2 40:3,4 48:20 49:5  
 55:9,10,25 56:1,2,6,17  
 62:14 63:2 67:14  
 73:9,18 83:15 85:4,5  
 86:5,7,9,11,13,13,14,15,16  
 87:1,3,8,9,9,9,14  
 88:5,11,16,19,21,23,25  
 89:4,21,22 90:10  
 91:17,21 92:1,3,21  
 93:24 97:6  
 98:10,18,19 99:1,6,8  
 101:17,22,23  
 102:1,5,10 103:7,22  
 104:15  
**strike (1)** 25:12  
**striped (5)** 13:18 23:16  
 26:1 40:18 42:25  
**stripes (4)** 13:21 14:12  
 20:10,24  
**subject (56)** 1:12,20  
 2:19 12:18,20 14:11  
 16:5 19:4,12,24  
 20:8,9,17,23 21:19,20  
 39:11 40:17 41:25  
 46:4,5 47:15  
 56:11,15,25 58:18  
 59:9,17,20,25 60:3  
 61:5,14 63:5,21,25  
 64:1,7,13,23  
 65:2,21,23 66:10,22  
 69:22 70:15 72:3 74:1  
 94:1,3,20 96:17,22  
 97:3 105:11  
**subjects (42)** 11:5,7,8  
 13:5,11 17:18,23 19:4  
 22:15 23:14 24:15  
 29:3 38:22 39:20  
 40:8,12 41:21 42:20  
 56:16,19 57:20,21  
 58:11,21,24 59:11  
 60:15,17 62:16,17  
 63:8 64:3,13,15,17  
 65:21 71:25 90:5  
 94:11,13,19 98:13  
**substantive (1)** 77:1  
**sudden (6)** 14:6,7 20:25  
 21:2 23:20 95:3  
**suggest (2)** 7:16 89:15  
**suggesting (1)** 89:16  
**suicide (7)** 37:16,20  
 39:4 73:3 74:5  
 95:14,20  
**suite (2)** 30:1,2  
**support (1)** 83:2  
**supposed (1)** 11:16  
**sure (12)** 10:25 46:5  
 63:19 67:19 76:13  
 80:25 82:4,19 94:7  
 99:21 103:18 105:19  
**surrounding (1)** 36:7  
**suspect (3)** 12:7,11  
 20:12  
**suspects (11)** 10:6,8  
 11:13 12:5 18:25 28:3  
 37:9,13 38:22 56:14  
 63:10  
**switched (2)** 64:12

81:12  
**sworn (8)** 2:5 31:16  
 50:13 76:3  
 106:3,5,7,10  
**synopsis (1)** 80:22  
**systems (1)** 80:2  


---

**T**

---

**tactic (1)** 55:15  
**tactical (3)** 98:22 90:7  
 98:12  
**taken (13)** 9:23 12:2  
 25:2 29:15,17 30:1  
 61:22 62:7 68:5 81:15  
 84:23 86:12 100:15  
**taking (7)** 4:8 82:17  
 84:3 89:20 95:15 98:4  
 101:20  
**talk (2)** 52:12 57:25  
**talked (1)** 52:11  
**talking (3)** 19:25 58:21  
 86:20  
**tall (1)** 8:25  
**tape (8)** 25:25 26:23  
 46:20 47:9,22 69:17  
 96:10,13  
**target (1)** 25:12  
**taser (8)** 3:13 32:25  
 52:8,22 78:19,25  
 79:11,13  
**tasking (1)** 79:25  
**taskings (1)** 80:1  
**tavern (1)** 56:2  
**team (1)** 81:3  
**teds (1)** 10:17  
**telephone (3)** 99:10,24  
 100:15  
**telling (2)** 14:5 20:22  
**temporary (1)** 76:24  
**terminals (1)** 78:7  
**terms (4)** 78:16 79:5,7  
 88:7  
**terror (2)** 2:17 32:4  
**terrorism (2)** 78:12  
 83:20  
**terrorist (13)** 5:25  
 6:8,11,16 7:10,12  
 34:20 55:6 72:19,21  
 73:11 75:13 84:6  
**terrorists (5)** 7:16,17  
 55:16 74:12 75:2  
**thank (36)** 2:1,9,10,21  
 30:20,24,24  
 31:1,2,3,21 49:22,24  
 50:1,2,5,17,18 51:7  
 75:20,22,22,24,25  
 76:2,7,20  
 104:20,22,23,24,25  
 105:1,7,13,21  
**thats (78)** 3:3,7,18,23  
 4:12 6:19 8:11 9:9,13  
 10:13 13:13 15:21  
 16:22 17:24 19:22  
 21:25 22:25 26:11  
 28:5 30:2,3,6,16,19  
 32:14 33:14 34:3,23  
 36:6 38:6 40:19 43:24  
 44:9 45:2,18 47:18  
 51:10,13,24 52:19,24  
 53:16 60:23,25 61:15  
 65:9 68:4,11,14,21,23  
 70:18 73:2,12,20  
 75:9,18 76:12,23

77:2,8,14 79:18,23  
 83:5 84:1 85:14 87:10  
 88:22 91:18 95:10,25  
 100:1,5,19,20,25  
 104:9  
**thereafter (3)** 2:3  
 28:6,6  
**theres (21)** 7:13 21:25  
 27:8 54:15  
 88:11,24,25 90:20,24  
 92:2,3,13 93:24  
 97:7,10 99:2 100:5  
 103:5,8,20,24  
**theyd (1)** 11:8  
**theyre (5)** 9:3 79:6  
 83:13,24 96:1  
**theyve (2)** 52:11 95:23  
**thing (3)** 15:24 38:3  
 94:9  
**thinking (4)** 84:4 91:23  
 95:11,19  
**third (10)** 16:4 21:19,20  
 25:2,10,15 41:25 59:9  
 66:11,21  
**though (2)** 8:10 59:22  
**thought (14)** 13:15 38:2  
 44:1 59:7 60:7 70:21  
 74:4 75:15,15 87:22  
 89:13 99:5,23 104:7  
**threat (33)** 7:25 8:1  
 9:5,12 11:22 21:9,13  
 24:4 25:16 65:11,12  
 66:6 84:12,16,24  
 89:10,14,25 90:1  
 91:4,7,25  
 95:5,6,10,19,24 96:15  
 97:19 100:11 102:23  
 103:4,6  
**threats (1)** 11:19  
**three (19)** 22:14 27:17  
 29:3 30:15 36:18  
 49:13 54:8 57:6 65:20  
 66:2,3,20 67:13,25  
 68:1,22 69:5 71:25  
 84:23  
**threw (1)** 81:18  
**throat (2)** 102:24,25  
**through (18)** 1:9 8:21  
 9:12 16:10 18:21 22:1  
 31:13 34:15 38:1  
 55:14 81:1,5 83:13,24  
 85:20 100:2 103:18  
 105:4  
**throughout (4)** 34:25  
 42:1 43:14 52:18  
**thrown (3)** 4:19,24 5:10  
**tidying (2)** 80:7,10  
**time (121)** 4:9,17  
 5:3,14 9:19 10:5,6  
 13:6 14:8,15,19  
 15:1,24 16:23,23  
 18:13 19:3 21:3,7,9,10  
 23:13,17,22 24:2  
 25:3,19 26:24,25,25  
 27:1,20,22,24  
 28:3,13,14,16,20  
 29:5,10,11,14,17,22,24  
 43:11,15,16,17,19  
 44:15 45:20  
 46:5,22,23  
 47:3,11,24,25 48:1,9  
 49:4,20 53:9 54:16  
 56:16,25 57:2,15

59:3,9 60:4  
 61:2,3,9,12 62:1,8  
 63:3,11,13,16,18,20  
 64:4,6,7,11 65:17,23  
 66:23 67:8,22 68:3,25  
 69:16,18,18,19 70:3  
 71:20 72:12 78:8,19  
 79:1 81:14 83:6 84:5  
 89:10 92:17 93:13  
 96:1,18 97:1,6,25  
 99:12 100:21 104:5  
 105:1  
**timed (1)** 69:11  
**timewise (1)** 63:19  
**timing (1)** 100:20  
**tj211 (1)** 51:17  
**today (3)** 1:11 99:14  
 105:5  
**together (1)** 84:3  
**told (9)** 7:6 8:12 13:14  
 22:6 42:6 55:22  
 83:19,23 84:2  
**tomorrow (1)** 105:6  
**tomorrows (1)** 105:11  
**too (4)** 18:15 63:19  
 86:20 97:9  
**took (6)** 34:2 81:22  
 82:8 99:11 100:5  
 103:4  
**torso (9)** 44:23,24  
 45:14 60:1,5 66:14,19  
 71:14 74:4  
**torsos (1)** 59:8  
**total (1)** 94:11  
**touch (1)** 19:12  
**towards (48)** 7:6 9:2  
 10:4,8,9 22:19 25:10  
 26:7 31:18 37:12  
 40:12 53:3 54:1,10  
 55:23,25 65:2,8 66:13  
 83:10,13 84:16  
 85:5,5,7 86:4,6 87:4  
 88:19,20 89:9  
 90:19,20 91:22 92:14  
 94:24 95:17 98:13,22  
 99:8 100:2,4,16  
 101:15 102:3,5  
 104:13,19  
**traffic (2)** 81:9,10  
**train (2)** 34:18,20  
**trained (5)** 7:24 21:12  
 45:2 51:14 77:3  
**training (10)** 3:2 7:23  
 11:16 46:3 51:11  
 60:23,25 75:2 77:6,10  
**transcript (1)** 105:11  
**transmission (2)**  
 82:12,23  
**transmissions (1)** 73:10  
**travel (1)** 82:25  
**travelling (6)** 54:12  
 55:9,25 82:22 84:8,24  
**travels (1)** 86:15  
**tried (4)** 14:23 96:6  
 101:10 104:9  
**trigger (2)** 79:10 95:18  
**trojan (4)** 80:16 82:13  
 83:17 91:13  
**trousers (1)** 72:1  
**try (5)** 25:6 85:24 96:6  
 102:22 104:1  
**trying (11)** 11:21 14:25  
 15:2,5,18 18:20 21:20

25:6 62:3 65:20 90:6  
**tube (1)** 48:20  
**tuesday (1)** 105:24  
**tug (1)** 25:6  
**turn (8)** 9:14 17:1 35:23  
 40:4 42:10 86:11  
 88:20 89:21  
**turned (4)** 36:2 42:16  
 56:1,17  
**turning (3)** 9:16,18,19  
**type (1)** 15:10  
**types (1)** 52:12  


---

**U**

---

**ultimately (5)** 84:7  
 85:16 93:16 97:9  
 104:18  
**unarmed (4)** 18:24 39:8  
 61:9,13  
**unbelievable (1)** 97:4  
**uncertain (1)** 88:7  
**underground (1)** 88:13  
**underneath (2)**  
 90:12,13  
**understand (6)** 2:15  
 9:11 32:2 55:3 103:1,2  
**understanding (2)**  
 15:9,11  
**understood (1)** 23:9  
**uneventful (1)** 3:22  
**unfolded (1)** 28:14  
**unfortunately (1)** 17:8  
**units (2)** 82:21,25  
**unnatural (2)** 90:10  
 92:23  
**unprecedented (1)**  
 72:18  
**unremarkable (1)** 33:12  
**unresponsive (1)** 66:22  
**until (14)** 12:10 19:6  
 25:15 29:25 43:14,16  
 47:15 57:19 59:10  
 61:7 64:6 70:16 104:5  
 105:23  
**unusual (1)** 89:13  
**unusually (1)** 92:16  
**update (1)** 83:9  
**updated (1)** 67:20  
**updates (2)** 54:22,24  
**updating (1)** 80:2  
**upon (2)** 99:6 101:8  
**upper (4)** 13:8 43:22  
 66:18 72:4  
**used (6)** 1:14 7:14  
 18:15 38:13 74:7  
 105:15  
**usher (1)** 105:16  
**using (4)** 5:20 21:6 43:7  
 62:4  
**usual (3)** 1:9 52:5 78:17  


---

**V**

---

**van (2)** 4:14 6:10  
**various (8)** 1:8 5:18  
 16:8 23:10 29:2 30:7  
 80:1 104:5  
**veg (6)**  
 10:15,17,17,19,23  
 17:13  
**vehicle (84)** 3:1,16,19  
 5:7,13 8:11  
 10:1,14,20,22 11:9

12:4,15 13:10 16:12  
 17:1,12,16,23 18:8,16  
 19:21 22:18,21 26:10  
 29:25 32:17 33:16  
 35:6  
 36:10,13,13,14,19  
 37:5,11 38:18 39:8  
 40:3,7,17 41:5,18  
 42:11 46:25 51:17  
 52:15,20 54:9  
 57:5,10,11,12,15,17  
 58:16,19 59:11,12,23  
 61:23 63:19 68:25  
 69:6 70:10,11 73:14  
 78:6 79:21 80:13,20  
 84:22 85:13,15 86:2  
 87:12 88:9,10,13,18  
 89:1,3,8,11  
**vehicles (8)** 5:11,18  
 29:21,22 51:12  
 77:13,15 78:8  
**verbal (5)** 60:17,19 61:2  
 65:20 94:19  
**verbally (1)** 94:6  
**vest (6)** 15:10 21:4 39:4  
 41:8 71:10 95:20  
**vests (4)** 15:16 37:17,20  
 41:1  
**via (1)** 80:15  
**viable (3)** 67:13  
 96:15,15  
**vicinity (1)** 89:2  
**video (19)** 16:16  
 17:3,20 18:3,23 26:4  
 27:6 40:5,14 41:2  
 47:5,13 48:4,11 52:25  
 53:4,4 69:24 71:16  
**videos (1)** 26:15  
**visible (1)** 66:14  
**vision (2)** 21:16 85:15  
**visual (1)** 98:22  
**visibly (2)** 83:16 89:11  
**voice (5)** 20:14 31:19  
 50:16 76:6 94:6  
**volumes (1)** 85:3  


---

**W**

---

**waist (1)** 37:22  
**wait (1)** 27:24  
**waited (1)** 29:25  
**waiting (2)** 20:15 42:9  
**walk (1)** 22:1  
**walked (3)** 12:17  
 70:10,11  
**walking (1)** 19:11  
**warm (1)** 104:7  
**warned (1)** 41:9  
**warning (3)** 28:15 44:18  
 68:3  
**warnings (2)** 14:17  
 20:17  
**wasnt (12)** 12:10 28:13  
 75:6,8 81:14 100:4  
 101:11,21,25 102:23  
 103:3 104:15  
**watch (3)** 26:12 48:8  
 71:7  
**watching (4)** 28:16  
 69:21 71:8 105:9  
**water (2)** 4:16 6:15  
**way (13)** 6:20,22 33:21  
 54:4,9 71:20 73:9 82:6

87:12 94:4 99:3  
 103:12 105:7  
**weapon (20)** 3:12 30:11  
 35:2,3,4 48:2 49:14,16  
 52:10,11 59:12  
 78:20,24 79:9 83:4  
 85:21 89:5,6 90:2  
 91:22  
**weaponry (1)** 3:11  
**weapons (10)** 7:14 20:5  
 32:23 35:22 36:3  
 49:10 78:25 79:6,7  
 88:2  
**wearing (11)** 37:16  
 38:7,25 39:2,20 40:18  
 45:25 52:25 78:17  
 81:14 93:18  
**wed (8)** 4:6 14:15 61:8  
 79:23 80:3 81:15  
 83:14 101:7  
**weekend (1)** 1:23  
**welfare (2)** 30:5,7  
**went (17)** 4:21 11:15  
 12:16 19:11 22:10  
 28:10 34:15 38:1,18  
 55:13 68:8 81:1 86:12  
 98:7 99:9 100:9  
 103:15  
**werent (7)** 23:25 53:7  
 70:15 95:3 101:9  
 103:10,13  
**west (1)** 88:14  
**westminster (5)** 5:4  
 72:22,23 81:3,4  
**weve (24)** 7:8 9:9  
 18:13,14,15 19:13  
 22:8 24:16 33:4 34:1  
 35:6 40:6 52:9 53:6  
 56:1 61:10 69:19  
 74:18 83:1 87:22  
 95:12,12 105:2,4  
**whatever (2)** 73:17  
 84:12  
**whatevers (1)** 97:22  
**whats (5)** 30:6 53:2  
 78:2 82:24 85:10  
**wheatshaf (22)** 10:18  
 12:13 14:25 16:3,6  
 21:21 36:5 38:24  
 41:24 42:1,23 43:1  
 47:1,23 63:9 71:4  
 74:22 75:7 101:10  
 102:2,4,21  
**whereby (1)** 30:4  
**whilst (8)** 54:11 59:22  
 78:14 84:7,23 85:17  
 90:6 101:15  
**white (6)** 13:20 14:12  
 20:10,24 29:1 41:7  
**whole (3)** 52:18 54:16  
 97:7  
**whom (6)** 33:3,4 51:20  
 53:6,6 94:20  
**whooshing (1)** 9:20  
**whose (1)** 31:7  
**windows (5)** 8:21 9:7,12  
 85:9,11  
**wires (6)** 12:25 13:23,24  
 23:25 29:2 37:21  
**wish (3)** 2:20 31:10 32:7  
**withdraw (9)**  
 14:16,20,22,23 18:1,6  
 28:4 40:25 94:4

withdrawing (2) 15:25  
41:17  
withdrawn (2) 61:8,10  
withdrew (9) 12:10  
14:22 16:4 18:7 19:19  
41:14 57:22 59:10  
67:20  
withheld (1) 1:13  
witness (11) 1:25 2:19  
16:12 31:8 32:6 45:19  
51:4 52:13 76:1,17  
105:11  
witnesses (5) 1:8,11 2:3  
3:17 105:5  
witness (1) 72:12  
wording (1) 80:18  
work (3) 63:2 83:1  
87:22  
working (3) 32:17 64:12  
82:14  
worried (1) 74:19  
worry (1) 31:20  
worse (1) 104:1  
wouldnt (3) 54:19 64:2  
67:14  
wrapped (2) 96:11,13

X

x26 (4) 3:12 32:25 52:7  
78:19

Y

yeah (3) 9:3 97:4  
104:12  
year (3) 1:11,11 72:18  
years (1) 76:25  
yellow (3) 10:24 17:14  
19:22  
yet (1) 61:6  
youd (1) 62:18  
youll (2) 34:21 69:23  
youre (10) 32:2 43:22  
45:2 50:23 51:14 56:3  
62:9 69:8 86:12 92:8  
yourself (5) 41:20 58:22  
75:3,3 84:17  
yourselves (1) 84:24  
youssef (1) 12:21  
youve (12) 5:8 7:6 18:1  
41:9 51:8 64:6 71:24  
77:3 84:2,21 91:22  
97:6  
yz (2) 12:18,21

Z

zaghba (1) 12:21  
zone (1) 104:7  
zoom (1) 61:20

0

0540 (1) 26:23

1

1 (10) 6:1,7 34:8 52:5  
59:4 65:25 79:3  
82:14,19 91:14  
10 (4) 3:24 71:7 79:15  
105:6

100 (4) 10:25 15:12  
62:24 75:4  
1000 (5) 3:21 4:3  
53:11,11 105:23  
1008 (1) 1:2  
100metre (1) 103:15  
1015 (1) 79:21  
1017 (1) 47:15  
1018 (1) 47:15  
1025 (2) 47:11,15  
109 (1) 105:22  
11 (1) 1:17  
1100 (1) 77:18  
1130 (1) 31:14  
1132 (1) 50:6  
1151 (1) 50:8  
116 (1) 73:7  
12 (2) 1:11 72:25  
13 (1) 17:18  
14 (1) 68:19  
15 (1) 102:6  
17 (5) 3:13 52:4,9,22  
68:18  
19 (2) 1:10 105:10  
1981 (1) 1:17  
1994 (1) 32:11  
1998 (1) 32:13

2

2 (8) 55:11 57:17 58:10  
59:4 65:25 99:14  
106:3,4  
2004 (1) 76:21  
2005 (1) 51:9  
2009 (1) 2:24  
2012 (1) 51:11  
2013 (1) 76:22  
2014 (1) 77:1  
2015 (1) 3:2  
2016 (1) 77:9  
2017 (9) 2:17,20 3:4,8  
32:4 51:2 72:18 76:15  
77:12  
2019 (2) 1:1 105:24  
22 (2) 72:21 73:6  
221647 (1) 16:24  
221650 (1) 16:25  
2217 (1) 61:19  
221732 (1) 61:22  
221826 (1) 100:20  
222232 (1) 27:1  
222235 (1) 26:5  
222240 (1) 26:5  
222250 (1) 27:3  
222252 (1) 46:22  
222300 (1) 26:6  
222312 (1) 27:3  
222323 (1) 27:4  
222325 (1) 47:3  
222329 (1) 47:24  
222350 (1) 69:18  
222352 (2) 47:25 48:12  
222353 (1) 69:18  
23 (3) 46:23 95:25,25

3

3 (14) 2:17 3:8 16:23  
26:25 32:4 47:24  
51:2,16 53:11 55:11  
57:17 58:10 76:15  
77:15  
30 (2) 18:22 61:22

300 (1) 51:23  
31 (2) 106:5,6  
34 (1) 52:4  
3708 (1) 25:25  
3730 (1) 46:21

4

4 (3) 2:19 32:6 56:12  
4000 (1) 47:9  
45 (1) 89:24

5

5 (2) 56:12,21  
50 (2) 106:7,8  
510 (1) 10:22

6

6 (1) 13:22  
655 (1) 47:22  
6foot (1) 8:25

7

7 (2) 2:20 32:6  
710 (1) 69:17  
72 (1) 106:9  
76 (2) 106:10,11

8

8 (2) 1:1 13:22

9

9 (1) 105:24  
90 (1) 65:9  
91c (1) 77:17  
99 (3) 80:16 82:13  
83:17