

OPUS 2

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London Bridge Inquests

Day 8A

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1 Thursday, 11 July 2019
 2 (10.04 am)
 3 (In the absence of the jury)
 4 THE CHIEF CORONER: Good morning, Mr Hough.
 5 MR HOUGH: Good morning, sir.
 6 (In the presence of the jury)
 7 THE CHIEF CORONER: Good morning, everyone. Nice to see you
 8 all .
 9 Mr Hough.
 10 MR HOUGH: Sir, our first witness is Fiona Ritchie .
 11 THE CHIEF CORONER: Thank you.
 12 MS FIONA RITCHIE (sworn)
 13 THE CHIEF CORONER: Good morning. Please do make yourself
 14 comfortable. I know you've got your arm in a sling . If
 15 you need a break at any time, just let us know. If you
 16 prefer to sit or stand, again, there is a seat behind
 17 you if you wish to sit .
 18 A. Thank you.
 19 Questions by MR HOUGH QC
 20 MR HOUGH: If I can just ask you to raise the microphone
 21 which is just to your side so you can speak into that
 22 and it will amplify your voice .
 23 Could you please give your full name for the court?
 24 A. My full name is Fiona Hume Ritchie .
 25 Q. Ms Ritchie, you understand I am asking you questions

1

1 first on behalf of the Coroner. Are you by profession a
 2 forensic scientist ?
 3 A. That's correct, yes.
 4 Q. Do you specialise in the examination of firearms,
 5 ammunition and related items?
 6 A. I do.
 7 Q. Does your expertise include the interpretation of
 8 gunshot damage and gunshot injuries?
 9 A. It does, yes.
 10 Q. Could you summarise, please, your relevant
 11 qualifications for the evidence you're about to give?
 12 A. I have a Bachelor of Science degree and a Master of
 13 Science degree in forensic science. I'm a professional
 14 member of the Chartered Society of Forensic Sciences and
 15 I've worked as a forensic scientist specialising in this
 16 field since February 2001.
 17 Q. Are you now employed by the Metropolitan Police Service
 18 within its forensic firearms unit?
 19 A. That's correct, yes.
 20 Q. Do you understand that you're giving evidence today to
 21 interpret gunshot damage and injuries in this case to
 22 help the jury's understanding of the sequence of events?
 23 A. That's correct, yes.
 24 Q. To assist in your work in preparing your report, were
 25 you provided with background information about the

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1 attack?
 2 A. I was, yes.
 3 Q. Were you also provided with CT imaging reports on the
 4 attackers which showed their injuries?
 5 A. I was.
 6 Q. Were you provided with CCTV images from Stoney Street
 7 showing the events of the attack?
 8 A. I viewed CCTV footage, yes.
 9 Q. Did the information provided to you include the fact
 10 that eight firearms officers had discharged rounds
 11 during the confrontation with the attackers --
 12 A. It did, yes.
 13 Q. -- and that they had collectively discharged 46 rounds?
 14 A. Yes.
 15 Q. Can you also confirm that all 46 casings were recovered
 16 from the scene?
 17 A. That was my understanding, yes.
 18 Q. For the jury's recollection, the eight officers who
 19 fired were BX44, BX45 and BX46, the officers in the
 20 first City of London Police ARV, and then E59, BY5,
 21 BY28, E122 and AY14.
 22 In order to carry out your work, did you perform
 23 a scene examination of Stoney Street on the days
 24 following the attack?
 25 A. I did, yes.

3

1 Q. What was your principal purpose during that scene
 2 examination?
 3 A. The initial purpose was to identify any gunshot damage
 4 to the Wheatsheaf public house and if possible determine
 5 any likely trajectories or range of firing and any
 6 gunshot damage caused to that building.
 7 I was also asked to assist in identifying other
 8 areas of gunshot damage in the vicinity, but this was
 9 primarily to assist in the recovery of any fired
 10 projectiles or projectile fragments.
 11 Q. May we bring up on screen, please, {DC5002/3}. If we
 12 maximise the image here, do we see an image taken from
 13 your report showing the front facade of the Wheatsheaf
 14 public house on the west side of Stoney Street?
 15 A. That's correct, yes. This is a photograph that I took
 16 during my scene examination.
 17 Q. How many bullet holes did you identify in the facade of
 18 the Wheatsheaf?
 19 A. There were two bullet holes present in the windows on
 20 the front of the Wheatsheaf public house.
 21 Q. Where were they?
 22 A. The first is just above marker 34. So there's a yellow
 23 marker placed on the window ledge on the exterior of the
 24 building. Just above and to the left of it is one
 25 bullet hole.

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1 Q. If we just pause there and we move to page 4 {DC5002/4},
 2 please, I think we may be able to see that more clearly
 3 over on the left-hand side of the screen; is that right?
 4 A. That's correct, yes.
 5 Q. So can we see the bullet hole above marker 34, a couple
 6 of panes up from the one to the left .
 7 A. That's correct, yes, it's just to the edge of the
 8 central frame. There's a scale marker positioned just
 9 to its right .
 10 Q. Is it right that that small window in which that bullet
 11 hole was found was immediately to the right of the
 12 southern entry door marked "Public bar"?
 13 A. That's correct, yes.
 14 Q. Can you tell us about the position of the other gunshot?
 15 A. The other bullet hole is positioned on the front of the
 16 window pane again, just above and to the left of marker
 17 35. So there's the yellow marker on the window ledge
 18 one pane above and one pane to the left , there's a hole
 19 in the centre of the glass .
 20 Q. Can we see that they are roughly the same level above
 21 the ground?
 22 A. They are, yes.
 23 Q. If we look at more focused images of those, may we look
 24 first at {DC7283/123}. We see there a slightly more
 25 focused image of the bullet hole by marker 35.

5

1 A. That's correct, yes.
 2 Q. And {PH1260/1}. Can we rotate this , please . A more
 3 focused image of the bullet hole near marker 34, now
 4 seen in proximity to that doorway to the south.
 5 A. That's correct, yes.
 6 Q. Then {PH1261/1}, please. We can see closer up the
 7 formation of the bullet hole in the window pane by
 8 marker 35.
 9 A. That's correct, yes.
 10 Q. And {PH1263/1}, a close-up image of the bullet hole by
 11 marker 34.
 12 A. That's correct, yes.
 13 Q. Now, around these bullet holes, did you notice anything
 14 you would describe as close-range discharge effects?
 15 A. I did not, no.
 16 Q. What are close-range discharge effects?
 17 A. Close-range discharge effects are deposits of unburnt or
 18 partially burnt powder propellant, blackening or
 19 scorching that occur when the muzzle of the gun is in
 20 relatively close proximity to the target . So it's
 21 material that's exited the gun along with the bullet
 22 that's then deposited on the surface .
 23 Q. What would the absence of visible close-range discharge
 24 effects , as here, suggest?
 25 A. The complete absence of such effects typically indicates

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1 that the shot was fired when the muzzle of the gun was
 2 in excess of approximately 30 cm or 1 foot of the
 3 material when the shot was fired . However, the presence
 4 of an intermediate attack target , so something in
 5 between the item we're looking at and the muzzle of the
 6 gun, would greatly reduce or eliminate such effects .
 7 Q. Can such effects also be reduced or eliminated by the
 8 type of weapon or attachments to the weapon?
 9 A. They can, yes.
 10 Q. What sort of attachments can have that effect?
 11 A. Silencers in particular will effectively reduce or
 12 eliminate these deposits, also flash hiders. So any
 13 accessory that's attached to the muzzle of the gun will
 14 affect either the quantity or the distribution of
 15 material .
 16 Q. If we can keep that image on screen, was there anything
 17 about the form of the bullet holes in the glass that
 18 suggested to you the direction of travel of the bullet?
 19 A. Glass exhibits a particular behaviour when it's struck
 20 by a bullet , and it allows us to very clearly identify
 21 the path, so the direction the projectile was travelling
 22 in. In this case, it was clear that the bullets had
 23 been travelling from outside the premises to the inside .
 24 Q. Within the Wheatsheaf, did you identify gunshot damage
 25 which corresponded with the entry holes in the glass?

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1 A. There was, yes.
 2 Q. Could we bring up {PH1274/1}. Now, I think we're
 3 looking here at the area of the Wheatsheaf immediately
 4 as one enters through the southern of the two entry
 5 doors.
 6 A. That's correct, yes, it's as you enter the doorway and
 7 turning slightly to the right .
 8 Q. Because the screen that we're looking at, the wooden
 9 screen with the glass windows in it, bisects the pub and
 10 is directly between the areas entered through the two
 11 doorways.
 12 A. That's correct, yes.
 13 Q. Where did you find a corresponding bullet damage sign in
 14 this area?
 15 A. If you look at the yellow marker, number 5, and look
 16 directly above it on the edge of that wooden partition,
 17 you can see two small green arrow stickers and then
 18 a further one on the tiled sign above that. There's
 19 an area of wood damage just above those stickers and
 20 a small area of damage to the edge of the tile , which
 21 won't be visible in this photograph, and that is gunshot
 22 damage.
 23 Q. If we look at a more focused image, please, {PH1275/1}.
 24 Can we see the damage more clearly in this image?
 25 A. That's correct, yes, there's just a small chip off the

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1 edge of the tile , the bottom tile , where the green arrow
 2 is pointing at, and then an area of damage to the wooden
 3 partition .
 4 Q. Then {PH1276/1}, this shows the bullet damage very
 5 clearly in focus. Did the form of this damage tell you
 6 anything about the direction and trajectory of travel of
 7 the bullet?
 8 A. The bullet was travelling front to back through the pub
 9 and from left to right .
 10 Q. Was the bullet itself recovered from this area?
 11 A. It was, yes. The bullet , the causative bullet of this
 12 damage, was embedded in the wood and was recovered by
 13 a police officer at the scene.
 14 Q. Did you associate this bullet hole with a corresponding
 15 bullet hole in the window?
 16 A. I did, yes.
 17 Q. Which one?
 18 A. This projectile , in my opinion, had passed through the
 19 window at marker 34, so the one on the further left of
 20 the facade.
 21 Q. So the one just next to the southern doorway?
 22 A. That's correct, yes.
 23 Q. Did you then also find a further area of gunshot damage
 24 within the pub corresponding to the northern bullet
 25 entry hole at marker 35?

9

1 A. I did, yes. There was further gunshot damage to
 2 a mirror on the wall on the right-hand side wall of the
 3 pub.
 4 Q. Can we bring up, please, {PH1296/1}. Is this the
 5 right-hand wall from the perspective of somebody
 6 entering the pub through the northern doorway
 7 immediately to the right of where the window was through
 8 which the bullet at marker 35 entered?
 9 A. It is the wall to the right, but it's further towards
 10 the back of the pub.
 11 Q. So it's a little further into the pub than the area we
 12 were looking at on the other side of the partition?
 13 A. That's correct, yes. It's further back in through the
 14 bar.
 15 Q. We can look now at {PH1297/1}. Looking at the bullet
 16 damage in this area, what did you deduce?
 17 A. Again, the bullet was travelling in a similar trajectory
 18 to the previous bullet in that it was travelling from
 19 the front of the pub through the pub with a left to
 20 right direction .
 21 Q. Now, we can see arrowed damage both to the mirror and to
 22 the wood immediately adjacent. Was all that damage
 23 caused by the path of this bullet?
 24 A. Some of the damage was caused by glass fragments
 25 produced when the bullets struck the mirror. So some of

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1 the small areas of damage, particularly to the mirror
 2 frame, were as a result of glass fragments. Other areas
 3 were due to the fragmentation of the bullet itself and
 4 bullet fragments striking areas of the wood.
 5 Q. Were any bullet fragments recovered in this area?
 6 A. There were, yes.
 7 Q. Where were they recovered from?
 8 A. A small fragment of bullet was recovered from the wooden
 9 partition wall located immediately behind the mirror.
 10 So that's the sort of green-grey painted area of wood
 11 with the green marker and the scale tape.
 12 Q. We can see more focused images. If we look, first of
 13 all, at {PH1306/1}, can we see there the damage caused
 14 by a bullet and glass fragments to the surrounding wood?
 15 A. That's correct, yes.
 16 Q. And {PH1308/1}, another view showing more clearly the
 17 damage to the mirror.
 18 A. That's correct, yes.
 19 Q. What did you deduce about the trajectory of this bullet
 20 and where it had entered the pub?
 21 A. The causative bullet of this damage, in my opinion, had
 22 entered at marker 35, so the one more centrally located
 23 in the windows in the front of the facade of the
 24 Wheatsheaf public house. Both the bullets had travelled
 25 from front to back through the public house with a left

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1 to right direction across the interior of the premises.
 2 Q. We know and the jury have heard that within the pub
 3 a customer, Mr McLelland, was injured by a bullet as it
 4 travelled through.
 5 I'm going to show a couple of still images of that
 6 sequence of events. They are a little distressing, sir,
 7 but obviously less so than the corresponding footage.
 8 If I can put on screen {DC7181/310}. Now, this is
 9 an image viewed from the inside of the pub in the
 10 southern portion of the front area. Can we see the
 11 signs circled in blue of a bullet entering through the
 12 glass?
 13 A. I believe that is the cloud of powdered glass produced
 14 when the bullet travelled through the glass pane.
 15 Q. Now, this is timed at 22.16.51, which was in the midst
 16 of the first engagement of the City of London police
 17 officers, BX44 to BX46, with the attackers. Which of
 18 the bullet holes that you identified in the front of the
 19 pub facade does this correspond to?
 20 A. This is the bullet hole at marker 34, so the one that is
 21 just beside the doorway.
 22 Q. Then can we have page {DC7181/311}. We can see from
 23 this image that Mr McLelland fell to the ground
 24 immediately afterwards, immediately after that bullet
 25 had traversed, and was in that position some time later

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1 when the police entered.
 2 A. Yes, that's correct, yes.
 3 Q. Now, we can take that off screen.
 4 Was that bullet, therefore, a bullet which entered
 5 through the pane at marker 34, struck Mr McLelland, and
 6 went on to strike the tiled and wooden area that you
 7 identified earlier?
 8 A. That's correct, yes.
 9 Q. What was the trajectory of the bullets coming into the
 10 pub when considered together, viewed from right to left?
 11 A. Based on the CCTV footage taken from inside the public
 12 house, the first shot, or the first bullet to strike the
 13 premises, was the one that entered at marker 35. In
 14 quick succession, the second bullet entered at marker
 15 34, both travelling from the front to the rear of the
 16 pub and both from left to right.
 17 Q. That's left to right viewed from the outside towards the
 18 pub.
 19 A. Exactly, if you're looking towards the pub.
 20 Q. Was there any evidence that the bullets ricocheted from
 21 any hard surface before entering the pub?
 22 A. There was not, no.
 23 Q. Was it possible that either one or both could have
 24 passed through a soft target --
 25 A. There is a possibility, yes.

13

1 Q. -- including through human flesh?
 2 A. That is a possibility.
 3 Q. May we put on screen now {DC0001/36}. If we focus upon
 4 the image, this is the scene viewed from an overhead
 5 CCTV camera looking north on Stoney Street at the moment
 6 of the initial confrontation between City of London
 7 officers and the attackers. The Wheatsheaf is the
 8 grey-green building over to the left of BX46; can you
 9 see that?
 10 A. I can, yes.
 11 Q. Now, BX46 we see has his weapon trained towards
 12 Khuram Butt, looking from the left of the image to the
 13 right. Is it fair to say that bullets fired from his
 14 weapon in that position would not have struck the pub?
 15 A. They would not, no. The weapon is facing the opposite
 16 direction.
 17 Q. Now, we can see that BX44 and BX45 both had their
 18 weapons out and that they were positioned over to the
 19 right of the road. Is it possible that bullets fired
 20 from either of their weapons, or, indeed, both their
 21 weapons, could have passed through the panes of glass in
 22 the pub in the way you've described?
 23 A. The trajectory of the projectiles through the public
 24 house indicates that the shots had been fired when guns
 25 were positioned in Stoney Street to the left of the

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1 Wheatsheaf, looking towards it from the outside, and
 2 pointing in the direction of the premises.
 3 It's hard to tell from this image, but if those
 4 officers are pointing their guns in the direction of the
 5 public house, then yes, it's possible that any bullets
 6 fired then could have entered the public house.
 7 Q. Now, assuming that this was the moment when we saw the
 8 cloud of glass within the Wheatsheaf, or the moment just
 9 before, does it stand to reason that the only weapons
 10 which could have been responsible for those bullets
 11 entering the Wheatsheaf were those of BX44 and BX45?
 12 A. Yes, based on the trajectories of the damage and their
 13 position, that's correct, yes.
 14 Q. Has it been possible, however, based on their positions
 15 and trajectory, to work out whether either of them in
 16 particular was responsible for either or both bullets
 17 going through those windows?
 18 A. Not based on that, no.
 19 Q. We can take that off screen now.
 20 Also in your scene examination, did you note other
 21 gunshot damage in the area?
 22 A. There was, yes. There was a significant amount of
 23 further gunshot damage identified in the area.
 24 Q. Did that include to some of the market stalls on the
 25 right-hand side of the street in that last image?

15

1 A. It did, yes, particularly to the metal shutters.
 2 Q. And also further up the road to the Monmouth Coffee
 3 Company on the left?
 4 A. That's correct, yes.
 5 Q. Did you carry out detailed examinations of any of that
 6 gunshot damage?
 7 A. It was not examined other than to confirm it was gunshot
 8 damage.
 9 Q. Thank you very much. Were there any other significant
 10 findings you made during the course of your scene
 11 examination or significant deductions you made?
 12 A. There were not, no.
 13 Q. May I now move to the post mortem examinations of the
 14 attackers. As well as viewing CT imaging reports, did
 15 you attend the post mortem examination for the three
 16 attackers on 5 June?
 17 A. I did, yes.
 18 Q. Now, what I'm now going to do is ask you a little about
 19 the gunshot wounds to them.
 20 Sir, I propose to use the body maps, which are
 21 stylised images showing the wounds.
 22 THE CHIEF CORONER: Yes.
 23 MR HOUGH: They are a little graphic, but obviously nowhere
 24 near so as photographs would be.
 25 THE CHIEF CORONER: I mean, I intimated yesterday afternoon,

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1 Mr Hough, when the jury were here that that was the sort
 2 of image we were going to look at, and I think I likened
 3 it in a sense to the image looking like a dummy that's
 4 used in a shop window. As you say, even with that, they
 5 can appear slightly graphic.
 6 MR HOUGH: Because they show the nature of the injuries .
 7 THE CHIEF CORONER: Yes.
 8 MR HOUGH: May we begin with Youssef Zaghba. What gunshot
 9 wounds did you find to him?
 10 A. There were two distinct gunshot entry wounds, one to the
 11 front of the chest and one to the back of the lower
 12 right chest.
 13 Q. Now, pause there and identify those on the body maps,
 14 {PM0103/5}, please. Do we see the position of the entry
 15 wound marked with 2.2 in the mid-chest area?
 16 A. That's correct, yes.
 17 Q. Then the next page, please, {PM0103/6}. Do we see the
 18 position of a second gunshot entry wound at the lower
 19 right chest area?
 20 A. That's correct, at the 2.6 mark.
 21 Q. Did you find a corresponding exit wound for either of
 22 these entry wounds?
 23 A. There was an exit wound to the upper back which
 24 corresponded to the entry to the front of the chest.
 25 Q. May we look at the next image {PM0103/7}. Was this the

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1 position of the exit wound in the back which
 2 corresponded to the chest entry wound?
 3 A. It was, yes.
 4 Q. Did you deduce the bullet track based on the entry and
 5 exit wounds?
 6 A. From the entry and exit wound to the front of the chest
 7 and the back, the causative projectile had travelled
 8 front to back, slightly upwards and slightly right to
 9 left relative to the normal anatomical standing
 10 position.
 11 Q. Was the bullet which had exited found during the course
 12 of the post mortem examination?
 13 A. A bullet was found in the inner layer of material which
 14 had been used to wrap the deceased and in my opinion,
 15 that bullet most likely originated from the exit wound
 16 to the upper back.
 17 Q. Was any exit wound found which corresponded to the entry
 18 wound lower down the back on the right-hand side?
 19 A. There was not, no.
 20 Q. Was the bullet, however, involved in that entry wound
 21 discovered?
 22 A. It was, yes. A hard object was palpable under the skin
 23 of the outer left chest wall, and this was recovered and
 24 found to be a bullet.
 25 Q. We can take that image off the screen now.

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1 Did you deduce from the entry wound and the position
 2 of the recovered bullet the track of this second gunshot
 3 wound?
 4 A. The bullet had entered the back of the right chest,
 5 travelled right to left, slightly upwards and back to
 6 front before coming to rest in the fat on the left side
 7 of the chest.
 8 Q. Were there any visible close-range discharge effects on
 9 these entry wounds?
 10 A. There were not, no.
 11 Q. However, were there close-range discharge effects on any
 12 other part of Youssef Zaghba's body?
 13 A. There were, yes, on the right hand.
 14 Q. Can we put on screen {PM0103/9}. Where were the
 15 close-range discharge effects by reference to this body
 16 map image?
 17 A. In the area of 3.5, there was red stippling marks. You
 18 can see some on this diagram, and they were also
 19 travelling down the index finger and along the top of
 20 the right thumb.
 21 Q. What would that suggest about the proximity of the hand
 22 to the muzzle at the point of firing?
 23 A. This indicates the deceased's hand was within 60 cm of
 24 the muzzle of the gun at the time the gun was
 25 discharged.

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1 Q. BX44, who fired on Youssef Zaghba during the initial
 2 engagement, recalls having discharged his weapon at very
 3 close range, and we know that shots weren't fired at
 4 Zaghba after that engagement. Would that be consistent
 5 with those discharge effects having been caused by his
 6 weapon?
 7 A. They would, yes.
 8 Q. We can take that off screen now.
 9 May I now ask you about the post mortem examination
 10 on Khuram Butt. Did you identify a significant number
 11 of gunshot injuries to Khuram Butt?
 12 A. There were significant wounds and numerous areas of
 13 gunshot injury identified.
 14 Q. Were you able to identify the numbers of bullets which
 15 had struck him or specify the internal wound tracks?
 16 A. It was not possible due to the complex nature of the
 17 injuries.
 18 Q. Now, if we look at the body map images to identify the
 19 nature of the injuries, {PM0097/4}, can we see a wound
 20 to the lower jaw, and {PM0097/5}, please, a wound at 1.5
 21 on the other side of the lower jaw? Were they
 22 consistent with gunshot injuries?
 23 A. They were, yes. In my opinion, they were most likely
 24 corresponding and the causative bullet had passed across
 25 the jaw, most likely from left to right.

20

1 Q. If we go back to page 4, please {PM0097/4}, we see at
 2 1.1 an injury to the left scalp.
 3 A. That's correct, yes.
 4 Q. Is that consistent with a gunshot?
 5 A. It is, yes, but in this case, most likely a fragment of
 6 projectile rather than a complete bullet.
 7 Q. {PM0097/16}, please. Can we see at 5.4 and 5.5
 8 significant injuries to the front chest area? Are they
 9 consistent with a gunshot track?
 10 A. They are, yes. They're typical of what we would call
 11 guttering gunshot wounds, so a wound produced when
 12 a bullet travels close to or across the surface of
 13 tissue, and these guttering gunshot wounds are possibly
 14 associated with the passage of a single projectile
 15 across the surface of the chest.
 16 Q. Then we can see at 5.2 a large injury to the shoulder,
 17 to the right shoulder. Is that consistent with any
 18 particular gunshot effect?
 19 A. There was a complex injury to the shoulder which
 20 included extensive tissue damage that, in my opinion,
 21 was most likely caused by cavitation effects.
 22 Q. What are cavitation effects?
 23 A. Some projectiles or bullets are produced with hollow
 24 point or soft point tips, so the top of the bullet, or
 25 the nose of the bullet, is made with a softer material

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1 with a harder jacket around the base of the bullet. The
 2 point of that is to allow some expansion of the
 3 projectile, the nose of the projectile, when it enters
 4 a target in order to effectively release as much kinetic
 5 energy from the projectile once it strikes the target.
 6 This causes what's called a temporary cavity. So the
 7 kinetic energy that's released causes tissue damage by
 8 forcing the tissue out of the way and causing this
 9 temporary cavitation effect. It's very damaging to
 10 tissue and causes effects like that seen at 5.2.
 11 Q. Then {PM0097/18}, please. Were there also injuries in
 12 the right hip area, the outer right hip area, consistent
 13 with gunshot damage?
 14 A. There were, yes.
 15 Q. Did you deduce anything about the wound track there?
 16 A. It wasn't possible to do so.
 17 Q. Then {PM0097/20}, please. Were there also signs of
 18 gunshot entry wounds in the back of the chest, so in the
 19 back area?
 20 A. There were, yes.
 21 Q. We can take that off screen now.
 22 Were bullets recovered from Khuram Butt's body?
 23 A. Three projectiles were recovered. Three complete
 24 projectiles were recovered from the deceased.
 25 Q. From which parts of his body?

22

1 A. One bullet was recovered from just under the skin on the
 2 front left chest -- left lower chest, upper abdomen, one
 3 from the right shoulder joint and one from inside the
 4 chest cavity.
 5 Q. Did you form a view about the number or minimum number
 6 of bullets by which Khuram Butt had been struck?
 7 A. In my opinion, he had been struck by at least six, but
 8 likely more, bullets.
 9 Q. Were there any visible close-range discharge effects
 10 suggesting a particularly proximate discharge to him?
 11 A. There were not, no.
 12 Q. May I now ask you about Rachid Redouane and the post
 13 mortem examination on him. Did you find a number of
 14 distinct gunshot entry wounds?
 15 A. There were four distinct gunshot entry wounds
 16 identified.
 17 Q. Could you put on screen {PM0101/4}, please. Were two in
 18 the front of the chest at positions 2.1 and 2.2 on this
 19 image?
 20 A. That's correct, yes. 2.1 and 2.2 identify gunshot entry
 21 wounds.
 22 Q. Then {PM0101/5}, please. Did you identify a gunshot
 23 entry wound to the front groin area?
 24 A. That's correct, as shown at 2.4.
 25 Q. Then {PM0101/7}, please. Did you identify -- it's

23

1 a wrong reference. The previous page, {PM0101/6},
 2 please. Did you identify, marked at 2.5, an entry wound
 3 to the back of the upper right chest?
 4 A. That's correct, yes.
 5 Q. Those were the four distinct gunshot entry wounds. We
 6 can take the image off screen.
 7 Were bullets recovered which you could tally with
 8 any of those entry wounds?
 9 A. Initially during the post mortem, two bullets were
 10 recovered. One recovered from the right buttock which
 11 corresponded to the entry wound to the front right
 12 groin. The second bullet was recovered from the left
 13 shoulder. This had most likely entered at the upper
 14 right back and travelled right to left across the back
 15 of the upper chest.
 16 Q. Were any further bullet fragments recovered from
 17 Redouane's body?
 18 A. A damaged bullet fragment was also recovered from the
 19 right forearm.
 20 Q. Were any further bullets recovered which had been found
 21 in the mortuary and were not within the tissue of the
 22 body?
 23 A. That's correct, yes. A further -- after the post mortem
 24 was completed, a further bullet was recovered from the
 25 mortuary. In my opinion, it most likely originated from

24

1 one of the entry wounds to the front of the chest.
 2 Q. Now, looking at your page 10, did you form a view about
 3 the number of bullets by which Redouane had been struck
 4 and the entry points and trajectory of those bullets?
 5 A. In my opinion, the deceased had been struck by at least
 6 six bullets, although there were a number of other
 7 injuries and abrasions present that may have been caused
 8 by further bullets or bullet fragments striking.
 9 Q. So you identified that there were two gunshot entry
 10 wounds to the chest.
 11 A. That's correct, yes.
 12 Q. What, in your view, had happened to the bullets which
 13 had entered in that area?
 14 A. In my opinion, one had remained in the chest cavity and
 15 the other had exited from the upper right back.
 16 Q. You identified a bullet entry wound to the right groin
 17 area. What had been the trajectory of that bullet and
 18 where had that come to rest?
 19 A. It had travelled front to back, essentially, coming to
 20 rest in the right buttock.
 21 Q. You identified an entry wound to the right upper back.
 22 What did you deduce about that bullet and its direction
 23 of travel?
 24 A. It had travelled right to left across the back of the
 25 upper chest and then come to rest just under the skin in

25

1 the left shoulder.
 2 Q. What were the other two bullets which you had identified
 3 as striking Redouane? Where had they entered and what
 4 had their direction of travel been?
 5 A. In my opinion, a fifth bullet had struck the upper left
 6 chest, travelling right to left, which caused an exposed
 7 wound track before entering and exiting through the
 8 upper left arm, and then a sixth bullet had passed
 9 through the right forearm with a fragment of bullet
 10 remaining in that wound track.
 11 Q. Were there also a number of other injuries and abrasions
 12 that may have been caused by further bullets or
 13 fragments of bullets striking the deceased?
 14 A. There were, yes.
 15 Q. Did you identify on Redouane's body any visible
 16 close-range discharge effects suggesting particular
 17 proximity of discharge?
 18 A. I did not, no.
 19 Q. As well as attending the post mortem examinations and
 20 carrying out your scene examination, did you examine the
 21 firearms used in the engagement and relevant magazines?
 22 A. I did, yes.
 23 Q. What were the firearms that were used? We don't need
 24 the details of every one, but the categories of firearms
 25 used.

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1 A. Of the eight weapons discharged, seven were carbines,
 2 which are short-barrelled rifles, and one was
 3 a self-loading pistol.
 4 Q. Were the five G36 carbines and two Sig carbines?
 5 A. There were, yes.
 6 Q. Did you examine all those firearms to determine whether
 7 they were in good condition?
 8 A. I did, yes.
 9 Q. Were they?
 10 A. They were, yes.
 11 Q. Were they test fired?
 12 A. They were.
 13 Q. During those test fires, were they found to be in normal
 14 working order?
 15 A. They were.
 16 Q. Did you also check their safety mechanisms --
 17 A. I did, yes.
 18 Q. -- and also equipment such as sights, magnifiers,
 19 illuminators and torches?
 20 A. That's correct, yes.
 21 Q. Is it fair to say that the particular equipment on
 22 different firearms varied from one to the other?
 23 A. It did, yes.
 24 Q. But were all found to be in working order?
 25 A. They were all in good condition and normal working

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1 order.
 2 Q. Now, you referred to a piece of equipment called a flash
 3 hider which could be fixed to a firearm. Did the
 4 carbines that were used have flash hidings?
 5 A. All seven were fitted with flash hidings at the muzzle.
 6 Q. Those, therefore, could have an effect in reducing
 7 close-range discharge effects.
 8 A. They can reduce the appearance and also alter it, so the
 9 visible appearance is slightly altered.
 10 Q. Is it possible that the stippling effect which we saw on
 11 the hand of Youssef Zaghba was caused by a firearm with
 12 a flash hider, as, of course, we know BX44's firearm
 13 had?
 14 A. It is, yes.
 15 Q. Did you measure the force that was required to pull the
 16 triggers on the firearms to determine whether any of
 17 them was unusually light or heavy in the trigger?
 18 A. I did, yes.
 19 Q. What were your conclusions?
 20 A. In my opinion, the trigger pull of each of the guns was
 21 not dangerously light and were at the upper end of the
 22 more commonly encountered values for such guns.
 23 Q. Is it normal for weapons issued to policemen and
 24 soldiers to have relatively heavy trigger pull values?
 25 A. In my experience, yes, service weapons tend to have

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1 slightly higher trigger pressures than similarly
 2 sporting or commercially sold weapons.
 3 Q. Any particular reason for that?
 4 A. Normally, with sort of commercial weapons, you want to
 5 have a lighter trigger pull so you have to exert less
 6 force. With service weapons, it tends to be slightly
 7 higher.
 8 Q. Did you carry out tests to determine if any of the
 9 firearms were discharged accidentally?
 10 A. I carried out a limited series of tests to see if any of
 11 the recovered guns would fire without pulling the
 12 trigger.
 13 Q. What sort of tests were they? What did they involve in
 14 physical terms?
 15 A. They're fairly basic in that we strike light blows to
 16 the guns and drop them to see if there's any way that an
 17 unexpected force could cause the gun to discharge.
 18 Q. Did you determine whether any of them had the propensity
 19 to discharge accidentally in that way?
 20 A. Based on the tests I carried out, these guns would only
 21 fire by pulling the trigger.
 22 Q. Did you examine the cartridges from the magazines with
 23 which you had been provided?
 24 A. I did, yes. I was provided with the magazines fitted
 25 with the cartridges inside.

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1 Q. Was all the ammunition consistent with police issue
 2 ammunition?
 3 A. It was, yes.
 4 Q. Did all the magazines and their cartridges appear to be
 5 in good condition and suitable for use in the weapons?
 6 A. They were, yes.
 7 MR HOUGH: Thank you very much. Those are all my questions.
 8 I'll just check whether others have any questions.
 9 MR HORWELL: No thank you.
 10 MR HOUGH: None do. Thank you very much for coming and your
 11 assistance this morning.
 12 THE CHIEF CORONER: Thank you very much indeed.
 13 MR MOSS: Sir, the next witness is Emma Wilson.
 14 THE CHIEF CORONER: Thank you very much.
 15 MS EMMA WILSON (sworn)
 16 THE CHIEF CORONER: Again, if you wish to take a seat,
 17 please do. Make yourself comfortable.
 18 A. I'll stand. Thank you though.
 19 THE CHIEF CORONER: Again, if I can ask you to probably draw
 20 the microphone slightly closer towards you. That's
 21 great. Thank you very much.
 22 Questions by MR MOSS
 23 MR MOSS: Could you please state your name?
 24 A. Emma Jane Wilson.
 25 Q. Ms Wilson, you understand that I ask questions first on

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1 behalf of the Coroner and then there may be questions
 2 asked of you by other lawyers.
 3 A. Yes.
 4 Q. Is this right: you are a forensic scientist?
 5 A. Yes.
 6 Q. You're here to give evidence as an expert.
 7 A. Yes.
 8 Q. You have been instructed to prepare a report and to give
 9 evidence as to whether the wine bottles which were
 10 filled with petrol were viable explosive devices.
 11 A. Yes.
 12 Q. Would you please summarise your relevant qualifications?
 13 A. I have a Bachelor's degree in biochemistry and
 14 a Master's degree in biomolecular archeology. I am
 15 a certified fire investigator and a member of the
 16 Chartered Society of Forensic Sciences. I became
 17 a forensic scientist in 2003 and began investigating
 18 fires and items related to fires in 2005.
 19 Q. As part of your investigation, is it right that you were
 20 provided with six wine bottles which were filled with
 21 wine, but were identical to the bottles which were used
 22 in the attack?
 23 A. Yes, six example wine bottles, yes.
 24 Q. These are the Baywood Fruity Rosé bottles that the jury
 25 have heard about.

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1 A. Yes.
 2 Q. Is it right that you understood that although you had
 3 wine in those bottles, it was petrol that had been in
 4 the bottles as part of the attack?
 5 A. Yes, that's right.
 6 Q. Were you told also that each of the bottles had had
 7 a piece of fabric wrapped around the top of them?
 8 A. Yes.
 9 Q. You were given the actual fabric that had been on the
 10 bottles in the attack.
 11 A. Yes, I was.
 12 Q. You were asked to consider whether, if ignited with
 13 a lighter or with a match, these would have worked as
 14 explosive devices.
 15 A. That's correct, yes.
 16 Q. At this point, you appreciate that I don't intend to ask
 17 you about the specific detail of how to construct one of
 18 these devices successfully. The court, and indeed the
 19 public, don't need to be told with precision how to make
 20 such a weapon, but what the jury does need to hear is
 21 whether these explosive devices would have worked, so
 22 whether these attackers made it successfully or not.
 23 A. Yes.
 24 Q. If we could first, please, look at {PH0002/1}. This is
 25 a photograph of some of the bottles that were found at

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1 the scene. Is it right that you have been shown this
 2 image or images like this?
 3 A. Yes, I've been supplied with several images similar to
 4 this one.
 5 Q. Then if we could turn to {PH3958/1}, this was the second
 6 photo you exhibited to your report. This is one of the
 7 devices that you constructed.
 8 A. Yes.
 9 Q. Is that typical of the amount of petrol that was in each
 10 one?
 11 A. The -- each of the bottles in the images I saw were
 12 filled to around the top of the label, approximately,
 13 with liquid of some sort.
 14 Q. Were you aware of there being any significant
 15 differences between the devices that the attackers made?
 16 A. No, my understanding was that they were all around that
 17 level of fill with petrol.
 18 Q. In respect of their assembly more generally, were you
 19 aware of any differences?
 20 A. The only differences that I could see in any of the
 21 images was that some of the wicks were very slightly
 22 differently knotted on the top of the bottle, but the --
 23 in terms of the bottle of construction and the level of
 24 fill, it was very similar.
 25 Q. So is it right that it is possible to make an explosive

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1 device using a wine bottle, petrol and a wick?
 2 A. Yes.
 3 Q. How does it work?
 4 A. A petrol bomb, when it has an amount of liquid petrol
 5 within a breakable container, so the glass bottle, and
 6 there's a wick inserted through the neck, that wick,
 7 that fabric or paper, can then be ignited, and then as
 8 that's thrown and it impacts a wall or hard surface,
 9 usually, the vessel breaks and it enables the petrol to
 10 become aerosolised into the air and it creates
 11 a fireball effect as that petrol becomes ignited by the
 12 flame that's on the wick.
 13 Q. We'll watch a video now, which is {AV0354}. This is the
 14 fifth video exhibited to your report, and is it right
 15 that this video will show a device which you made that
 16 is the correct way to make a petrol bomb? This is
 17 a typical construction.
 18 A. It's the standard method of creating a petrol bomb.
 19 Q. This isn't the method used in the attack?
 20 A. No, it wasn't.
 21 Q. But if you were to use the parts of the device that were
 22 used, this is the best petrol bomb that it's possible to
 23 make.
 24 A. This is the only form that's the definition of a petrol
 25 bomb rather than an alternative device.

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1 Q. Is it right that your method was to compare the device
 2 which was made by the attackers to the best device that
 3 you could make with those items?
 4 A. Yes.
 5 Q. Could we please watch the video.
 6 (Video played)
 7 If we could please pause it there.
 8 Is it right that, knowing everything that you were
 9 told about the devices made by the attackers, there was
 10 one respect in which you couldn't be sure quite how the
 11 devices were constructed and, as such, you've
 12 constructed devices by two possible different methods,
 13 either of which might have been used by the attackers?
 14 A. That's correct, yes.
 15 Q. What was, then, the method of your investigation? How
 16 did you approach this?
 17 A. I filled each bottle that I received. Having removed
 18 the wine, I filled each bottle with petrol to around the
 19 top of the label. I then reattached the cap, put the
 20 wicks back on with the original knots still in place,
 21 lit the wicks, threw them against the wall and then
 22 obviously observed the effects.
 23 Q. As I said, there were two ways in which they might have
 24 been constructed by the attackers. Is it right that
 25 when you replicated that construction, in one way, the

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1 devices did work, and when you constructed them in the
 2 other way, they didn't work?
 3 A. That's correct, yes.
 4 Q. Is it right that you tested each method of construction
 5 twice, so you did four tests in total?
 6 A. Yes, that's correct, yes.
 7 Q. If we look at the wicks first, you tested whether the
 8 trip of grey fleece from the top of each bottle was able
 9 to hold a flame.
 10 A. I carried out two separate tests, not including any
 11 bottles or any petrol, where I ignited the wicks just
 12 using a small -- a lighter flame, and during that time,
 13 within a short period, they were able to self-sustain
 14 a flame.
 15 Q. If we could please put on screen a video, {AV0349},
 16 we'll see your test on a wick here, and I think it's
 17 right that this is a wick from bottle number five of the
 18 six you were given.
 19 A. Yes.
 20 Q. But you could see no real difference between that and
 21 the other wicks.
 22 A. The fabrics all looked the same.
 23 Q. Could we please watch that video.
 24 (Video played)
 25 What does that video show?

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1 A. That video shows that it actually is a very short period
 2 of time to ignite that fabric using a frame, and that
 3 while the fabric is still in vertical, the flame
 4 progresses quite quickly up the vertical surface.
 5 Q. In your report, you say that only brief contact with
 6 a flame is needed.
 7 A. Yes, brief contact.
 8 Q. So, as you've said, you assembled the devices in two
 9 different ways. We're going to look at one of those
 10 methods first. If we look at another video on the
 11 screen, please, this is {AV0350}, and if we watch the
 12 video and then explain what it shows.
 13 (Video played)
 14 A. So this video, the wick is ignited and the bottle is
 15 then thrown against the wall, as we saw in the first
 16 video of the perfect petrol bomb. However, in this
 17 video, you can see the wick actually goes out before the
 18 bottle impacts the wall and releases the petrol, so
 19 there's no flame to ignite the aerosolised petrol.
 20 Q. So the movement of the wick through the air is enough to
 21 extinguish the wick?
 22 A. Yes.
 23 Q. If we look at {PH3968/1}, does this show the label and
 24 the glass of the bottle ending up in a pool of unburnt
 25 petrol?

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1 A. Yes.
 2 Q. Is it right: if we call this the unsuccessful method, is
 3 it right that if a second unsuccessfully constructed
 4 device were thrown at this pool of petrol, that might,
 5 in fact, ignite the pool of petrol?
 6 A. Yes, if you remember that in the video we just watched,
 7 we saw a very small flaming particle of fabric move
 8 through the air, but away from where the bottle was
 9 thrown. It's certainly possible that if that were to
 10 happen when the second device, unsuccessful though the
 11 actual device may be, were thrown, that that flame could
 12 still contact the pool of petrol that was then present
 13 and cause that pool to ignite.
 14 Q. So two unsuccessful devices thrown in quick succession
 15 might combine to create one successful device.
 16 A. That's correct, yes.
 17 Q. If we now turn to the second method of construction we
 18 have in video {AV0352}, this is your third video.
 19 Again, if we watch it and then you can say what it
 20 shows.
 21 (Video played)
 22 So that is one of the ways in which the attackers
 23 might have constructed the devices?
 24 A. Yes, yes. So it's a very slightly modified version of
 25 the unsuccessful device that we saw earlier and, as you

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1 can see, that slight modification actually results in
 2 the success of that device.
 3 Q. You've said earlier that you tested each device or each
 4 method twice.
 5 A. Yes.
 6 Q. When you tested this again, did you get a similar
 7 result?
 8 A. Yes.
 9 Q. Are you satisfied that because those two tests had
 10 a successful result, that all six devices, if
 11 constructed in that way, would have been viable?
 12 A. Yes, I am, yes.
 13 Q. In summary, then, in your conclusions, is it your
 14 opinion that the fabric strips were capable of
 15 sustaining a flame?
 16 A. Yes, they were.
 17 Q. Is it also your opinion that when constructed in
 18 a particular way, the bottles were viable explosive
 19 devices?
 20 A. Yes, they were.
 21 Q. Even if constructed in a similar but less effective way,
 22 two bottles thrown in quick succession might have been
 23 viable devices?
 24 A. Yes.
 25 MR MOSS: Ms Wilson, I have no further questions for you.

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1 I don't know if others do.
 2 Sir, unless you have any questions?
 3 THE CHIEF CORONER: No, I don't. Thank you very much, that
 4 was very interesting.
 5 Really just to underline, as Mr Moss says, it's
 6 really not important for us to see how they are devised,
 7 and you could quite understand why we wouldn't show how
 8 you could successfully make such a device for fear that
 9 people may actually learn something from it. So that's
 10 why we have not seen that part of it.
 11 Mr Hough, I am going to suggest that perhaps we
 12 might take our break there because, again, I think we're
 13 going to change our topic slightly and we're going to
 14 then turn on to the topic of training in respect of
 15 firearms, as you indicated yesterday.
 16 MR HOUGH: Two firearms instructors both to tell the jury
 17 about training and to provide their assessments of the
 18 officers' actions by reference to that training.
 19 THE CHIEF CORONER: Yes, thank you very much. We'll break
 20 there.
 21 (11.07 am)
 22 (A short break)
 23 (11.24 am)
 24 (In the absence of the jury)
 25 THE CHIEF CORONER: Mr Hough, whenever we have got to in the

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1 evidence, we will break at about 12.40 or 12.45, only so
 2 that Mr Horwell can catch up with the cricket news. It
 3 depends whether you are an Australian or an English fan.
 4 MR HOUGH: Thank you.
 5 (In the presence of the jury)
 6 MR HOUGH: Sir, our next witness is Paul Sheridan.
 7 THE CHIEF CORONER: Thank you.
 8 T/CI PAUL SHERIDAN (affirmed)
 9 THE CHIEF CORONER: Good morning, Mr Sheridan. Please do
 10 make yourself comfortable. If you wish to sit, that's
 11 absolutely fine, and the most important thing is to
 12 speak clearly into the microphone whether you are
 13 sitting or standing.
 14 A. Good morning, sir. Thank you.
 15 Questions by MR HOUGH QC
 16 MR HOUGH: Would you please give your name and rank for the
 17 court?
 18 A. Yes, I'm Chief Inspector Paul Sheridan.
 19 Q. Mr Sheridan, what role do you occupy within the
 20 Metropolitan Police?
 21 A. I'm the chief firearms instructor for the
 22 Metropolitan Police.
 23 Q. Do you understand that you're here, first of all, to
 24 give evidence about relevant policies, practices and
 25 training governing firearms officers in the

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1 Metropolitan Police --
 2 A. Yes.
 3 Q. -- and that you will also be providing an assessment of
 4 the actions of the Metropolitan Police officers who were
 5 involved in the confrontation with the attackers by
 6 reference to their training?
 7 A. Yes.
 8 Q. First of all, a little about your own background. Have
 9 you been in police service since 1995?
 10 A. Yes, that's correct.
 11 Q. Have you been a trained firearms officer since the year
 12 2000?
 13 A. Yes.
 14 Q. Since then, have you held the role of armed response
 15 vehicle officer?
 16 A. Yes, that's correct.
 17 Q. The higher level role of counter terrorism specialist
 18 firearms officer?
 19 A. Yes.
 20 Q. National firearms instructor?
 21 A. Yes.
 22 Q. Firearms tactical advisor?
 23 A. Yes.
 24 Q. Operational firearms commander on the ground?
 25 A. Yes, that's correct.

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1 Q. And tactical firearms commander?
 2 A. Yes, that's correct.
 3 Q. Were you appointed the chief firearms instructor in
 4 August of 2017?
 5 A. Yes, I was.
 6 Q. What does that role involve?
 7 A. The -- primarily, the role involves advising the armed
 8 policing commander in the Metropolitan Police around all
 9 of the things to do with firearms. It also involves
 10 ensuring that the firearms training plan is formulated
 11 and it's achieved throughout the year, and that that
 12 does conform with all the guidance as provided by the
 13 College of Policing.
 14 Q. May I first ask you, then, about policies and training
 15 materials. Is it right to say that firearms officers of
 16 the Metropolitan Police and other forces are trained and
 17 accredited in accordance with national policies,
 18 guidance and materials and with local policies?
 19 A. Yes, that's correct.
 20 Q. Looking at your first witness statement, page 2, can you
 21 tell us what were the principal policies and materials
 22 in place as at 3 June 2017 which govern the training of
 23 armed officers?
 24 A. Yes, we have the Authorised Professional Practice for
 25 armed policing, which is written by the National Police

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1 Chiefs' Council. This is a live document. It is
 2 regularly updated electronically.
 3 Q. Does that document set out policies and practice for
 4 armed policing operations?
 5 A. Yes, it does.
 6 Q. What are the other documents?
 7 A. Well, we have a police use of firearms and less lethal
 8 weapons standard operational procedures, which was
 9 version 13 on 3 March, and that's written by the
 10 Metropolitan Police Service, by the policy unit, and
 11 signed off by the commander of armed police.
 12 Q. What's the content of that document? How does it differ
 13 from the Authorised Professional Practice?
 14 A. So it's more detailed standard operational procedures
 15 for the Metropolitan Police officers to follow. It
 16 gives them clear guidance in much more detail than the
 17 previous national document.
 18 Q. Is there then a training curriculum prepared at national
 19 level?
 20 A. There is, yes. There's a National Police Firearms
 21 Training Curriculum, which is written by the College of
 22 Policing. This contains the basic minimum standard for
 23 specific role profiles.
 24 Q. Are there then profiles specific to the
 25 Metropolitan Police for each firearms role or job?

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1 A. Yes, there are. Underneath the national role profiles ,
 2 we then have the Metropolitan Police firearms role
 3 profiles , which are specific just to the MPS.
 4 Q. Now, is the College of Policing a national body which,
 5 among its other roles , maintains standards of firearms
 6 training?
 7 A. Yes, that's correct.
 8 Q. What role does the College of Policing have in licensing
 9 training by UK forces?
 10 A. So they govern all of the licences , effectively , for
 11 police firearms training across the country. So they
 12 will conduct yearly checks to ensure that we meet the
 13 correct standards, as required nationally , and they
 14 provide a re-licensing every four years as well.
 15 Q. So each individual force delivers the training , but is
 16 licensed to do so and is subject to checking by the
 17 College of Policing .
 18 A. Yes, that's correct.
 19 Q. You've already said that it's the College of Policing
 20 that produces the training curriculum for firearms
 21 officers . Is that a document which is divided into
 22 modules and units covering each aspect of training?
 23 A. Yes, that's correct.
 24 Q. So there may be a module or unit covering a particular
 25 skill or form of practice .

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1 A. Yes.
 2 Q. Are those modules and units then grouped together to
 3 form the set of skills required for each role profile ,
 4 each firearms job?
 5 A. Yes, that's right .
 6 Q. So at a national level , an armed response officer will
 7 be expected to be trained to have certain skills as set
 8 out in the curriculum.
 9 A. Yes.
 10 Q. That will be a national minimum for the particular role .
 11 A. Yes.
 12 Q. Do forces then at a local level undertake an additional
 13 exercise to determine further skills for particular
 14 roles?
 15 A. They do. So each year, each force will do its own
 16 strategic threat and risk assessment around what they
 17 perceive their armed officers will need in each of the
 18 role profiles . They will then determine if they would
 19 like to add on additional skills to the national levels
 20 that have been set.
 21 Q. So, for example, an urban force may decide that armed
 22 response officers need particular skills which a rural
 23 force might not.
 24 A. Yes, that's right .
 25 Q. Are those then put together into profiles for each role

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1 at a local level?
 2 A. Yes, they are.
 3 Q. Using that as the starting point, will the instructors
 4 in each local force then prepare materials for the
 5 training of officers in each particular role?
 6 A. Yes, once we have the local role profiles that we would
 7 like , it's then down to the instructors under my
 8 governance with the MPS to work out exactly how that's
 9 going to be delivered , and also the amount of hours that
 10 we will take to deliver it , depending on the facilities
 11 that we have to offer .
 12 Q. Will the locally prepared materials include documents
 13 such as lesson plans , training packs , course materials?
 14 A. That's correct, yes, and risk assessments.
 15 Q. You've told us that this local process is overseen and
 16 accredited by the College of Policing at a national
 17 level .
 18 A. Yes, it is .
 19 Q. May we look at an example, which is the current role
 20 profile for armed response officers , and if we have on
 21 screen {DC8201/4}. So can we see that we're looking at
 22 the local role profile for armed response vehicle
 23 officers in the Metropolitan Police Service .
 24 A. That's correct, yes.
 25 Q. We can see that the role profile requires the officer to

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1 have been trained in the module covering the carrying,
 2 handling and shooting of a firearm.
 3 A. Yes.
 4 Q. The use of module concerning the use of less lethal
 5 weapons, such as a taser .
 6 A. Yes.
 7 Q. Then further down the page, additional skills which may
 8 be provided as a team resource to nominated officers ,
 9 an enhanced first aid element to the course --
 10 A. That's correct, yes.
 11 Q. -- and a variety of others.
 12 Then over the page, please {DC8201/5}, does this
 13 document also tell us what refresher training is
 14 required each year for armed response officers?
 15 A. Yes, that's correct. That's the last piece on the
 16 document.
 17 Q. So that's 115 hours of what's called contact time, but
 18 what does that mean?
 19 A. So the -- each day, if I can give you an example of
 20 a normal eight hour day, obviously that will involve
 21 an element of turning up and sorting equipment out,
 22 et cetera. So that's not included in the training. The
 23 actual contact hours is the physical time you are
 24 training. So you -- whilst you might be on a eight hour
 25 day, the actual physical training may only be four hours

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1 or six hours, and that's your four or six hours of
 2 contact time.
 3 Q. If we see that it includes what are called
 4 classification shoots for particular firearms. What are
 5 classification shoots?
 6 A. So these are shoots that are at a national standard that
 7 the officers must achieve, and they must achieve those
 8 shoots twice a year.
 9 Q. Requiring a certain degree of accuracy in various forms
 10 of firearms practice.
 11 A. That's correct, yes.
 12 Q. Then separate shoots described as development shoots;
 13 what are they?
 14 A. So these are development shoots that we can incorporate
 15 between the classification shoots to bring on their
 16 skills in various ways and to -- that the officers
 17 experience different shooting scenarios, for example
 18 darkness or shooting whilst moving, et cetera. That
 19 isn't necessarily in the national shoots. So just to
 20 bring on their skills further.
 21 Q. Then we can see further requirement for tactical
 22 training days. What are they?
 23 A. So these are when we will run scenarios for the
 24 students, and as you can see, for the ARV officer, there
 25 are five lots of four tactical training days throughout

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1 the year that they must achieve as a minimum standard.
 2 So it's tactical training days, teaching them how to
 3 search, and everything that isn't just in arranged
 4 shooting, everything around their job, be that detaining
 5 pedestrians, detaining people in vehicles, searching in
 6 premises. Everything that their role entails we will
 7 fit into those days throughout the year to ensure that
 8 everything is covered for their role profile, and every
 9 eventuality that they may come across.
 10 Q. Might that include counter terrorism work?
 11 A. Yes, that's correct.
 12 Q. We can see that there's also a requirement every year
 13 for first aid training and training in the use of taser.
 14 A. Yes, that's correct.
 15 Q. If we go back to the previous page, page 4 {DC8201/4},
 16 can we see in the initial rubric that this training is
 17 given to prepare the officers for their
 18 responsibilities, including spontaneous armed response?
 19 A. Yes.
 20 Q. Take that off screen now.
 21 That was the document as in force at the moment.
 22 Was the training essentially the same or very similar in
 23 the period before 3 June 2017?
 24 A. Yes, it was, yes. It was -- from my recollection, it
 25 was slightly less hours. I think it was 110 hours at

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1 the time, but we've since had more elements put in.
 2 Q. May I ask you about the role profiles for various
 3 different roles which the jury have heard about, and
 4 I'm now looking from page 4 and page 5 of your first
 5 statement.
 6 First of all, the jury have heard reference to
 7 a strategic firearms commander, an individual who was
 8 called and briefed relatively early on in the incident,
 9 as V134 told the jury yesterday. What's the role of the
 10 strategic firearms commander in a firearms operation?
 11 A. It's to determine a strategic objective of an operation,
 12 and to set any tactical parameters for the deployment.
 13 Q. What's the rank or level of that officer?
 14 A. It's usually a superintendent or above.
 15 Q. What training does that officer have to go through?
 16 A. So the initial course is five days long, and then once
 17 they've done that, every 12 months they must do
 18 six hours' locally mandated training and six hours with
 19 the College of Policing.
 20 Q. Is the requirement for re-accreditation every five
 21 years?
 22 A. Yes.
 23 Q. Next, the role of tactical firearms commander. V134
 24 played that role in this incident, and she told us
 25 yesterday that she was stationed in the ARV pod in the

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1 special operations room and was giving directions on the
 2 tactics of the firearms operation from there. What's,
 3 in textbook terms, the role of the tactical firearms
 4 commander?
 5 A. It's to command and coordinate the overall tactical
 6 response to the incident.
 7 Q. What's the training an officer goes through to take on
 8 that role?
 9 A. So there are two levels in this. There's the initial
 10 course for the tactical firearms commander, which is
 11 five days, and then there's a preplanned option, which
 12 is a further course, which is a further five days.
 13 Q. Is there refresher training each year for officers in
 14 that role too?
 15 A. Yes, so they must complete at least two operations
 16 a year, which will be documented, and they must attend
 17 again 12 hours of refresher and development training.
 18 Q. Again, a new accreditation every five years?
 19 A. Yes.
 20 Q. Next, the role of operational firearms commander. We've
 21 heard that an inspector with call sign Trojan 1 was the
 22 operational commander on the scene of the Borough Market
 23 attack from relatively early on. What's the role of
 24 that commander in a firearms operation?
 25 A. It's to implement the tactical firearms commander's

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1 plan, effectively , on the ground.
 2 Q. So he or she is giving the direction on the ground to
 3 firearms officers .
 4 A. That's correct.
 5 Q. What's the training for that role?
 6 A. The initial course is three days for us as
 7 an operational firearms commander and, again, through
 8 the year, they must do at least two operations that are
 9 documented and they must do 12 hours of refresher
 10 training .
 11 Q. Then the role of firearms tactical advisor. We heard
 12 yesterday from an officer known as F69, who sat near
 13 V134 in the control room and gave her advice on firearms
 14 tactics . What's the role of the firearms tactical
 15 advisor?
 16 A. It's to advise the strategic and the tactical firearms
 17 commanders on the resources they have available and what
 18 those resources may be able to achieve within the
 19 parameters that are set.
 20 Q. Will this usually be an experienced firearms officer ?
 21 A. Yes.
 22 Q. What additional training will an experienced firearms
 23 officer undertake to become a firearms tactical advisor?
 24 A. So the course for this is five days for the spontaneous
 25 operations, and there's a further five days for the

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1 preplanned operations, followed by the 12 hours per year
 2 of refresher and development training for commanders.
 3 Q. Finally concerning role profiles , the ARV officers .
 4 We've gone through the role profile , because they're the
 5 officers we're most concerned with. What is the extent
 6 of their initial course?
 7 A. So at the time of this incident, their course was
 8 10 weeks long, their initial course.
 9 Q. You've told us that at the time of this attack, the
 10 requirement was for 110 hours of refresher training each
 11 year. Have you checked the training records of all the
 12 Metropolitan Police firearms officers involved in the
 13 confrontation with the attackers?
 14 A. Yes, I have.
 15 Q. Did you find them to be up to date with their firearms
 16 and first aid training?
 17 A. They were, indeed, yes.
 18 Q. Can I next ask you about first aid and emergency life
 19 support training that ARV officers have. What training
 20 in this regard is standard for an ARV officer?
 21 A. So they -- the first aid is under something we call the
 22 emergency life support, and it's under a module called
 23 D13 and all of the armed response vehicle officers
 24 receive this .
 25 Q. What injuries are covered by the course? What types of

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1 injuries?
 2 A. So it ranges from minor injuries up to ballistic
 3 injuries .
 4 Q. Knife injuries?
 5 A. Yes.
 6 Q. Are those skills practised as part of tactical exercises
 7 during training?
 8 A. Yes, they are. So they'll do the initial course, which
 9 has got the theory, and then they begin to also do this
 10 in scenario training to ensure that it's blended in with
 11 all their other work.
 12 Q. Are officers trained and expected to perform emergency
 13 life support even, in some situations, on those they
 14 have just shot?
 15 A. Yes, absolutely .
 16 Q. So, for example, in the Westminster case where you gave
 17 evidence last year, the officers involved in the fatal
 18 shooting moved forward straightaway to provide first
 19 aid.
 20 A. Yes, the duty of care remained. So as soon as someone
 21 has been shot and the threat has been neutralised, then
 22 they'll look to apply first aid to that person, the
 23 overall objective being to save life .
 24 Q. However, if an area is not safe, for example because of
 25 other attackers immediately in the area, or suspected

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1 explosive devices present, what does training teach
 2 officers ?
 3 A. So they're -- the first part of the sort of threat and
 4 risk assessment around the first aid is to look for
 5 danger, so they're looking for danger. There's
 6 obviously no benefit in them becoming injured prior to
 7 them actually being able to give first aid or, at the
 8 same time, becoming further casualties . So they would
 9 have to ensure the area was safe before they move
 10 forward to provide first aid.
 11 THE CHIEF CORONER: I'm just going to pause one moment.
 12 Thank you.
 13 MR HOUGH: So, in summary, officers are expected to perform
 14 emergency life support on those whom they can treat, but
 15 only when it is safe to do so.
 16 A. That's correct, yes.
 17 Q. May I now ask you about the decision model which
 18 officers are trained to use in making decisions. It's
 19 been referred to by some of the officers already, but
 20 I'll ask for your assistance in describing it, and when
 21 doing so, may we please have an image on screen,
 22 {DC7752/2}.
 23 Now, is this an image which depicts in graphic form
 24 the national decision-making model which firearms
 25 officers are trained to use?

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1 A. Yes, it does.
 2 Q. Can you take us through this model and how it is
 3 supposed to work, how officers are trained to follow it?
 4 A. Yes, of course. So the first thing to point out is it's
 5 scalable. So if you've only got literally a matter of
 6 a second or two to utilise it, or you have several days
 7 to utilise it, the same model works.
 8 So at the very top, the "I" for "information", this
 9 is where the person is going to gather as much
 10 information as they can, given the time that they've
 11 got. You then move around on to the threat assessment
 12 and what level of threat you think this -- needs to be
 13 put to it, how you grade the information.
 14 In so doing the threat assessment, you would also
 15 work out a strategy for how you might want to deal with
 16 this, whatever you're faced with. You would then look
 17 at the powers and policies, so what are you able to do
 18 with any options that you might consider, what powers
 19 will support you in doing that?
 20 You would then look at your options, so what options
 21 do you have that are within those powers that fit in
 22 your strategy? And then with the options element of it,
 23 that could well include receiving advice from the
 24 firearms tactical advisor, for example, just to ensure
 25 you're made aware of all the options that your resources

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1 may allow you to do.
 2 Then finally, around about the 10 o'clock position,
 3 you've got the actions. So you review your options, you
 4 will choose your best option. You will then go to the
 5 actions and then once you have acted, you will then
 6 review that, which brings you straight back round to the
 7 top, which is information, so you're looking if there's
 8 any fresh information, and then you will continue in
 9 that circular motion around that model until the
 10 incident is resolved.
 11 Q. Is this a model which can be used by a firearms
 12 commander in the course of a long, carefully planned
 13 operation?
 14 A. It is, yes.
 15 Q. Is it also a model which can be used by a firearms
 16 officer in the space of seconds, dealing with
 17 an immediate threat?
 18 A. Exactly the same, yes.
 19 Q. Has experience taught that it's a valuable aid to
 20 structured thinking even in that fast-time situation?
 21 A. Yes.
 22 Q. But in a fast-time incident, is it recognised by the
 23 training and by the model that it may not be possible to
 24 separate out, describe and justify each stage of the
 25 process?

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1 A. Yes, that's right.
 2 Q. Have you considered the approach of the officers, as set
 3 out in their statements and in the transcripts of their
 4 evidence to these Inquests, by reference to that model
 5 and the situation in which they were placed?
 6 A. Yes, I have.
 7 Q. We'll come to your assessment shortly. We can take that
 8 off screen now.
 9 May I now ask you about how officers are trained to
 10 deal with suspects who have apparent explosive devices
 11 on their person. First of all, are armed response
 12 vehicle officers trained in how to deal with people
 13 apparently carrying explosive devices?
 14 A. Yes, they are. They're trained in the initial courses
 15 and also with subsequent continuation training as part
 16 of their 110 hours per year.
 17 Q. At the time of the London Bridge attack, did the
 18 Metropolitan Police have a set of procedures under the
 19 name of Operation Andromeda for dealing with
 20 person-borne IEDs?
 21 A. Yes, that's correct.
 22 Q. If we look, for example, at {DC8193/1}, can we see that
 23 lessons were prepared to provide training in how to deal
 24 with Operation Andromeda situations within London?
 25 A. Yes, that's correct.

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1 Q. In addition to classroom-based learning, were
 2 large-scale exercises conducted to help officers
 3 understand how to deal with such incidents?
 4 A. Yes, they were. At the time or just prior to these
 5 offences, we had some large-scale exercises running
 6 actually in Hornchurch with the City of London Police
 7 that the ARVs vehicles' personnel from both forces were
 8 involved in.
 9 Q. So officers were trained and they were also trained in
 10 the context of explosive devices alongside their City of
 11 London colleagues?
 12 A. That's correct, yes.
 13 Q. We can take that document off screen now.
 14 What is the overarching strategy for an officer
 15 facing a suspect with an apparent IED?
 16 A. The protection of life.
 17 Q. How is that to be achieved?
 18 A. Ideally by utilising distance and control over the
 19 subject and, if possible, speaking with the subject and
 20 ensuring that all the members of the public and the
 21 police are at a safe distance so that you can do that,
 22 so that you can try and neutralise the threat from the
 23 object in a safe way.
 24 Q. Of course, neutralising the threat is something that can
 25 be done in a variety of different ways.

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1 A. That's correct, yes.
 2 Q. You referred to officers being taught to speak to the
 3 suspects from a distance and to obtain cover. What are
 4 officers taught, in detail, about distances to be
 5 maintained and cover to be obtained, if possible?
 6 A. So if it's available, then the Met did have
 7 a ballistic -approved vehicle that we could get with
 8 a loudhailer that we could sit in and speak to these
 9 people, and the distance that was recommended with that
 10 was 25 metres, if you were able to be in that vehicle
 11 and then utilise a loudhailer.
 12 If that vehicle -- and we only had one vehicle -- if
 13 that wasn't available, and I don't believe it was
 14 available on this night, then the recommended distance
 15 was 100 metres behind a hard cover, so behind a wall,
 16 corner of a building, for example, and then either shout
 17 or use a loudhailer.
 18 Q. Does the engine block of a BMW X5 count as hard cover?
 19 A. It may be the best that's available, but no.
 20 Q. Now, in this case, we'll get to the detail shortly, but
 21 we have heard from the officers that they didn't think
 22 it possible to attain the requisite distance or the
 23 requisite degree of cover because they needed to
 24 maintain eye contact with the prone suspects and to keep
 25 them covered with firearms to protect the public. As

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1 I say, we'll get into the detail of that shortly, but as
 2 a general principle approach, what's your view of that?
 3 A. I think the officers correctly summarised the threat in
 4 the fact that in a perfect world, they would rather have
 5 had 100 metres' distance. Clearly, the members of the
 6 public, their lives were very important and that
 7 prevented them from having this distance, so they chose
 8 to stay close and in so doing put themselves at huge
 9 risk, effectively.
 10 Q. Do you consider that that was an appropriate decision in
 11 the circumstances?
 12 A. I do, yes.
 13 Q. Can I now ask you about coordination of working between
 14 the Metropolitan Police and the City of London Police.
 15 Is it right that the training of City of London Police
 16 armed officers is managed by your opposite number in
 17 that force, the chief firearms instructor?
 18 A. That's correct, yes.
 19 Q. You've told us of one example of Metropolitan Police and
 20 City of London police officers training together in
 21 Hornchurch. Is this a regular occurrence?
 22 A. Yes, it is.
 23 Q. Do you have regular contact with your opposite number in
 24 the City of London Police?
 25 A. Yes. Yes, we meet every sort of six to eight weeks to

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1 go through the different training plans and see where
 2 we're able to link our officers together for the
 3 training opportunities.
 4 Q. Is there also a written protocol between your force, the
 5 City of London Police and the British Transport Police,
 6 who also have firearms officers, which governs firearms
 7 operations in London?
 8 A. Yes, that's correct.
 9 Q. In an operation, will initial command remain with the
 10 force deploying officers to the scene?
 11 A. Yes, it will.
 12 Q. Where there are multiple forces involved, so officers,
 13 for example, from the Metropolitan Police and the City
 14 of London Police at a scene, how will command
 15 responsibilities be organised?
 16 A. Through direct liaison with the tactical firearms
 17 commanders and the strategic firearms commanders to
 18 ensure that they are all joined up in how it's working
 19 and who will take the lead, depending on what resources
 20 are on the ground.
 21 Q. Is a different approach taken if an Operation Plato
 22 declaration is made by a tactical firearms commander in
 23 the Metropolitan Police command room?
 24 A. Yes. So that will be run by the central command unit of
 25 the Metropolitan Police.

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1 Q. That unit will direct firearms resources also from the
 2 other forces.
 3 A. Yes, that's correct.
 4 Q. Without going into detail, does the protocol also
 5 provide for joint communications arrangements, including
 6 setting up radio channels to help officers between the
 7 various forces liaise?
 8 A. Yes, there are radio channels that are assigned to
 9 assist with this process.
 10 Q. May I now move to your assessment of the
 11 Metropolitan Police officers and their actions, which
 12 you address in your second statement. Is it right to
 13 say that you have reviewed a CCTV compilation prepared
 14 by the Independent Office of Police Conduct showing the
 15 footage, some of which the jury have seen, in
 16 Stoney Street?
 17 A. Yes, that's correct.
 18 Q. Have you also read the officers' witness statements?
 19 A. Yes, I have.
 20 Q. Read the ballistics report of Ms Ritchie?
 21 A. Yes.
 22 Q. Read the report of the Independent Office of Police
 23 Conduct on the incident?
 24 A. I have, yes.
 25 Q. Read the explosives officers' statements and the command

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1 officers' statements?
 2 A. Yes.
 3 Q. In addition, have you been keeping yourself apprised of
 4 what's been going on in these Inquests by reading the
 5 transcripts?
 6 A. I have, yes.
 7 Q. Using all that material, have you assessed the actions
 8 of the five Metropolitan Police officers who fired, as
 9 well as the three command officers, by reference to
 10 their training and proper practice?
 11 A. Yes, I have, yes.
 12 Q. Can we go through those officers one by one, please.
 13 First of all, BY28. If we put on screen {DC7181/304}.
 14 Now, BY28 is an officer in the first Metropolitan Police
 15 armed response vehicle to enter Stoney Street. As we
 16 see from these two images, at 10.17 he moved forward
 17 from his vehicle to check the attackers on the right who
 18 had been shot, namely Redouane and Zaghba. Having seen
 19 apparent explosive devices on them, he retreated to
 20 cover behind the nearside front of the armed response
 21 vehicle.
 22 He said that he directed commands for Redouane to
 23 keep his hands visible, that Redouane didn't respond to
 24 those commands. He also says he saw a strap around
 25 Redouane's lower back with what he thought was a lead or

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1 cable running from it. He said a time came when he saw
 2 an apparent deliberate movement involving Redouane
 3 reaching with his right hand around his body. That was
 4 at 10.23. He fired two rounds because he was concerned
 5 that Redouane was moving to detonate the device.
 6 If we go, please, to page 295, we can see him
 7 marked, BY28, at the moment that he fired upon Redouane.
 8 What has been your assessment of this officer's actions?
 9 A. So from reading his statement, as he's arrived, he has
 10 initially gone up to both the subjects lying on the
 11 floor with a view to providing first aid. He has then
 12 obviously realised what he believes are improvised
 13 explosive devices. So then utilising the danger first
 14 model as training, as per his training, he's stepped
 15 back into cover and began communicating with the
 16 subject, and I think it was only then that there's been
 17 no communication back. However, the threat, it appears
 18 from his statement, has increased by the movements. So,
 19 therefore, he has felt the need as an individual to need
 20 to neutralise that threat.
 21 Everything I've seen from and read from the video
 22 and from the statement, he has done everything as per
 23 I would expect from his training.
 24 Q. May I now ask you about E59, and can we go back, for
 25 this purpose, to page 304 of the same document. E59 was

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1 an officer whose armed response vehicle was driven and
 2 parked up just outside Stoney Street and ran up the
 3 road. We can see from the lower image that he came up
 4 the right side of the road and he said that he saw
 5 Youssef Zaghba, the illuminated male at the bottom
 6 right-hand corner of the image, wearing an apparent
 7 explosive device.

8 He says that he retreated behind the armed response
 9 vehicle and was told that Redouane also had an explosive
 10 device. He then covered Redouane with his firearm from
 11 behind the ballistics shield behind the back of the car.
 12 He said he saw a strap around Redouane's back and he
 13 challenged Redouane not to move. He told the jury that
 14 he saw Redouane apparently moving and fired four shots
 15 to Redouane's back until he was no longer moving and no
 16 longer a threat.

17 If we look back at page 295 {DC7181/295}, we can see
 18 where he was positioned, marked E59, at the offside rear
 19 corner of the ARV with the ballistic shield just down by
 20 his legs. What was your assessment of this officer's
 21 conduct?

22 A. So, again, this officer, when he's first arrived at the
 23 scene, he has obviously been taking in all of the
 24 information and he, I think, initially was going to look
 25 to provide first aid, but was very quickly made aware or

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1 noticed that there were these IEDs on the individuals,
 2 so has backed off.

3 One of the officers has given him a short ballistic
 4 shield, and it's worth pointing out that that doesn't
 5 have any capabilities to stop the blast at all. It's
 6 just for bullets. So whilst he had it in front of him,
 7 it was better than nothing, but you can see it only
 8 comes up to his waist.

9 So, again, he wasn't able to back off more than he
 10 wanted to. He, along with the others, attempted to
 11 communicate with the individuals, who were
 12 uncommunicative and not listening to the instructions.
 13 So, again, he, at a point, by reading in his statement,
 14 reached a conclusion that he needed to neutralise the
 15 threat utilising lethal force.

16 So again, everything I've read about him and seen, I
 17 would say that it was as per all the training that we've
 18 given him.

19 Q. May I now ask you about BY5. We can take this document
 20 off screen now.

21 BY5 is an officer who parked near the crashed van to
 22 the north of Stoney Street, made his way through the
 23 market area and took position on Stoney Street north of
 24 the suspects. He found a City of London police officer
 25 there, BX44, who pointed out where Khuram Butt was

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1 outside the Wheatsheaf.
2 If we bring up, please, {DC7248/14}. We can see, on
3 the upper image, BY5 approaching through the market. On
4 the lower image, him approaching BX44, who was behind
5 a green pillar taking cover to the north of the
6 suspects.

7 Then {DC7248/15}, we see BY5 remaining to the rear
8 of BX44, and then next page, please, {DC7248/16}, we can
9 see him there behind BX44, apparently with his weapon
10 raised, trained on the suspects.

11 Then {DC7248/19}, please, we can see him directly
12 behind BX44 with the sign of a gunshot being fired at
13 the level of BX44.

14 BY5 gave evidence that he, from his perspective, saw
15 tubes on Khuram Butt's body which were apparently part
16 of a vest and which he believed to be a bomb vest. He
17 described seeing Butt's arms move up. He said he
18 shouted a challenge and for Butt to stop moving, but he
19 believed Butt would detonate, and that he fired a total
20 of three shots aimed towards Khuram Butt's body.

21 What was your assessment of that officer's conduct?

22 A. Sir, as you've explained, he has walked through the
23 marketplace from the original crash site and,
24 effectively, he's found himself on his own, searching
25 through to find the threat, passing several victims as

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1 he went through. When he's found the threat, which is
2 where the other officers are, he has been very quickly
3 briefed by them as to what's happened, and the
4 information he has ascertained is that these people were
5 wearing improvised explosive devices as well.

6 He began communicating with Mr Butt on the ground,
7 as Mr Butt was attempting to raise himself up, and so he
8 felt in his mind that Mr Butt was about to detonate one
9 of the devices, which would have not only killed
10 himself, the officer, but all of his colleagues and,
11 more than likely, the members of the public close by.
12 So he has made that decision to use force at that point.

13 Again, looking at everything he's done, reading his
14 statements, I would say, one being on his own, going
15 through, he's acted incredibly bravely to continue
16 through everything that he has seen, but also, he has
17 done everything as per the training that I'd expect of
18 him.

19 Q. AY14, the fourth Metropolitan Police officer you were
20 asked to consider. May we bring up {DC7181/293}. We
21 can see that AY14 emerged from the first
22 Metropolitan Police armed response vehicle and was
23 initially covering the suspects from a position to the
24 left of it.

25 He also approached Redouane and Zaghba. If we go to

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1 {DC7181/304}, we can see that AY14 came in relatively
2 close to them at 22.17, shortly after the initial
3 firing. He then took cover beside the nearside front of
4 the car, which we can see on {DC7181/295}.

5 AY14 said that he was aware that Butt, like the
6 other suspects, was wearing a suicide vest, that he saw
7 Butt starting to move, appearing to push himself up and
8 raising his head and torso, but he believed Butt would
9 detonate the device; that he fired at Butt's upper
10 torso, apparently without effect, but Butt continued
11 movement and that AY14 then fired a further shot in the
12 direction of Butt's head, at which point Butt slumped to
13 the floor.

14 What was your assessment of his actions?

15 A. Yes. Again, sir, he's been up close to the individuals
16 when he first arrived. He's then backed off, noticing
17 the IEDs on them, and then positioned himself -- you see
18 a photograph where he's positioned there. He's got no
19 cover whatsoever if any of those explosive devices did
20 detonate.

21 That said, he has communicated to Mr Butt to, "Stay
22 still, show us your hands". There's been no response
23 from that whatsoever, so then he's made that decision,
24 when he believed that Mr Butt was about to detonate his
25 device, to fire shots.

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1 So, again, everything that he did is in line with
2 their training. There's nothing that isn't outside of
3 what he's done.

4 Q. Then, finally, E122, who is in a similar position at
5 each stage to AY14. He was an officer in the first
6 Metropolitan Police ARV to enter Stoney Street, like his
7 colleague.

8 If we go back to {DC7181/304} and look at the lower
9 image, we can see that E122 also approached Redouane and
10 Zaghba. He said that he realised that they were wearing
11 apparent explosive devices. If we go to {DC7181/295},
12 we can see that he, like AY14, took cover to the side of
13 the armed response vehicle.

14 He said he saw Butt becoming more active, not
15 responding to verbal commands. He saw Butt starting to
16 sit up. He said he shouted at him to show his hands,
17 but there was no response. So E122 fired three shots
18 from his Glock, which was the firearm he had. He was
19 the only one with a pistol rather than a carbine in his
20 hands, and that he reassessed after each shot.

21 What was your assessment of his conduct?

22 A. It's very similar to AY14 in that he has assimilated the
23 information around the same time. That said, he hasn't
24 backed away the 100 metres. He has stayed close,
25 because he knows there are innocent members of the

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1 public around, so he has put himself on offer there.
 2 He hasn't gone to lethal use of force immediately.
 3 He has attempted to communicate to the individuals,
 4 including Mr Butt, and it's only when there has been no
 5 response from that and a positive movement of was what
 6 he considered to be about to detonate that device that
 7 he has resorted to a lethal use of force.
 8 So, yes, along with the others, I'd say that he has
 9 done everything as per training.
 10 Q. Now, looking at the officers collectively, are you
 11 satisfied that, based on what they saw, they were facing
 12 an apparently serious threat?
 13 A. Yes, without a doubt.
 14 Q. Did you conclude that there was a cogent rationale given
 15 by each of them for his use of force?
 16 A. Yes.
 17 Q. Firearms officers are taught that they have to be able
 18 to justify each use of force; yes?
 19 A. Yes, that's correct.
 20 Q. You consider that the decision to open fire on each
 21 occasion was justified.
 22 A. Yes, I do.
 23 Q. At any point in this confrontation, was the use of
 24 a taser rather than a firearm ever a realistic option?
 25 A. No, it wasn't.

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1 Q. Why not?
 2 A. Because the training and experience over the years has
 3 told us that a taser wouldn't be a good option for using
 4 with someone with an improvised explosive device,
 5 because it may activate the device.
 6 Q. It may be obvious, but was there ever an option during
 7 this confrontation, as you have seen it described, for
 8 the officers to tackle the subjects at hand or use any
 9 force short of their firearm?
 10 A. No, definitely not.
 11 Q. We've heard that the officers didn't, when they saw the
 12 explosive devices and became aware that the suspects
 13 were still alive, simply shoot them dead immediately at
 14 the outset. They didn't immediately shoot to kill,
 15 shoot for the heads straightaway when they noticed those
 16 devices. Was that in accordance with their training and
 17 proper practice?
 18 A. Yes, it is, yes.
 19 Q. Why is that, just to make it clear?
 20 A. Because the purpose is to neutralise the threat and save
 21 life. So if that can be done by the least use of force
 22 possible, then that's what should be done. And I think
 23 communication will always be that first level, and if
 24 the person communicates back and shows that they are not
 25 going to detonate the device, then we can look at other

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1 options then.
 2 Q. So even in this situation with people apparently wearing
 3 explosive devices, that degree of restraint is still
 4 built into the psyche of the firearms officers.
 5 A. It is, yes.
 6 Q. When the suspects were lying in front of them, the
 7 officers kept shouting commands to them to stay still
 8 and show their hands. Is that also proper practice and
 9 training practice?
 10 A. Yes, it is.
 11 Q. Even when the suspects began to make movements, on
 12 a number of occasions, the officers issued warning
 13 shouts before they fired. What would be the reason for
 14 the officers behaving in that way?
 15 A. To ensure that the individuals were aware of the
 16 situation that they were in and that they must comply
 17 with the instructions. Otherwise, the police may have
 18 to resort to utilising lethal force.
 19 Q. So to avoid the use of lethal force if at all possible.
 20 A. Ideally, yes.
 21 Q. May I move on to another subject now: the evacuation of
 22 the Wheatsheaf. Could we put on, please, {DC7181/308}.
 23 Shortly after the shooting of Khuram Butt from across
 24 the road at just before 10.30 that night, BY5, along
 25 with two City of London officers, moved across the road

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1 to evacuate the Wheatsheaf. We can see them moving
 2 across the road. In this still image, they are circled.
 3 The reason they gave for going across to evacuate
 4 the Wheatsheaf is they were concerned Butt's device
 5 might explode, injuring and killing those inside because
 6 of his closeness to the Wheatsheaf and because they were
 7 also concerned about a person they had told had been
 8 injured in the pub. BX45 held a ballistic shield, BX46
 9 covered Khuram Butt during the evacuation, and BY5
 10 managed the evacuation, ushering people out of the pub.
 11 What was your view of the decision to evacuate when
 12 the officers made it?
 13 A. I think BY5 was in an extremely difficult position. As
 14 he pointed out: he had a subject lying on the floor with
 15 an improvised explosive device and another two close by.
 16 He didn't know if that device was on a timer or could be
 17 remotely detonated or, indeed, still detonated by the
 18 person that was wearing it.
 19 Protocol, as you've heard, is for them to create
 20 distance, ideally up to 100 metres behind ballistic
 21 cover, but clearly members of the public were at risk
 22 within that 100 metres, the most obvious of which were
 23 inside the Wheatsheaf public house. And he also had the
 24 stress of knowing from the communications from the pub
 25 that there was a seriously injured person in there that

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1 more than likely needed medical care.

2 So he was really between a rock and a hard place
3 with everything. He went with the removing people and
4 he's arranged a plan and got that organised to get
5 people out.

6 I, looking at, reading everything, all the
7 statements and the reports and looking at the CCTV, our
8 primary objective is to save life and whilst the
9 officers there obviously continued being in that close
10 zone and being at great risk to themselves, they
11 obviously put the lives of the members of the public
12 first, and I think he took the right decision to move
13 people out of that pub, even though it was very close to
14 the IED, for those reasons.

15 Q. Can I now move on to the topic of after care and the
16 arrival of explosives officers. We've heard that it
17 took some time to call explosives officers to the scene,
18 and that after their arrival, at around 11.00 pm, they
19 needed to assess the scene and prepare to go forward and
20 look at the attackers. As a result, there was no first
21 aid given to the attackers while the officers were
22 covering and waiting for the explosives officers.

23 Do you consider that that was a reasonable approach
24 in the circumstances?

25 A. Yes, I do. Yes, and this brings us back to the danger

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1 of the area. So if you're going to be doing first aid,
2 then you must first check that it's safe to go into that
3 area and provide that first aid. Clearly with the
4 intelligence and the information they had at the time,
5 by closing down a distance to provide first aid would
6 have put those individuals at greater risk.

7 So as per their training, they would stay in cover
8 until the threat is identified and assessed properly by
9 the professionals to do that, before they would then
10 advance and provide first aid.

11 Q. The explosive expert, Mr Short, entered Stoney Street at
12 about 23.16 and shortly afterwards assessed the vests as
13 hopeless devices, but only after he'd actually removed
14 them from the attackers' bodies. By that stage, it was
15 obviously possible to carry out first aid, but the
16 attackers were obviously dead.

17 Do you consider that the appropriate course was
18 followed in waiting for the explosives officers and
19 then, when it was apparent that the attackers were
20 obviously dead, concluding that nothing more could be
21 done?

22 A. Yes, absolutely.

23 Q. Finally, can I ask you about the command roles performed
24 by F69 and V134 in the control room. You deal with
25 these from page 7 to page 9 of your report.

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1 F69 described to the jury how he was alerted to the
2 incident, began passing information to armed response
3 vehicles immediately to ensure the attendance of armed
4 officers. That after the Plato declaration, he notified
5 the armed officers of that immediately. That he
6 considered deployment of further resources, such as
7 specialist firearms officers and explosives officers,
8 and that he provided tactical advice throughout.

9 I think you've considered his evidence and all the
10 records of what he did that night. What was your
11 assessment of his conduct?

12 A. That he performed as per his role and training by,
13 again, utilising the national decision model in
14 providing options for the TFC and the SFC.

15 Q. Then the tactical firearms commander, V134, she told us
16 that she was informed of a potential Plato situation by
17 the senior officer in the control room, Mr McKibbin.
18 She gave directions for armed officers to go to the
19 scene and that her role also involved dealing with other
20 armed calls from around London while arranging for
21 contingency resources for possible further attack
22 locations.

23 Now, how, in your view, did she perform her role
24 that night?

25 A. It's so difficult to imagine the stress that she must

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1 have been under performing that role with everything
2 going on at the time and being the person that's making
3 the decision and then following it, and everything that
4 I've read has been absolutely as her training should be
5 and it's a credit to her that she managed to do that as
6 well as managing other incidents that were coming in at
7 the time for the five or six hours after that point. So
8 yes, 100% she dealt with that definitely in line with
9 her training and more, and some.

10 Q. So in summary, you have considered the actions of the
11 Metropolitan Police firearms officers at all levels in
12 this incident. Your role involves being critical of
13 officers and their conduct and their duties from time to
14 time; that's correct, isn't it?

15 A. Yes, that's correct.

16 Q. But is it right, in summary, that you found nothing to
17 criticise and much to praise in the context of these
18 officers?

19 A. Without a doubt, yes.

20 MR HOUGH: Thank you very much. Those are all my questions,
21 I don't know if others have any.

22 THE CHIEF CORONER: Mr Horwell.

Questions by MR HORWELL QC

24 MR HORWELL: Mr Sheridan, any police officer, but in
25 particular a firearms officer in circumstances such as

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1 these, has to approach a suspected IED on the basis that
 2 it is viable until told otherwise by an explosives
 3 expert.
 4 A. Yes, that was the advice given, yes.
 5 Q. Now, there has been no criticism of the actions of the
 6 firearms officers that night, and I just want to see if
 7 we can summarise your evidence in a sentence or two.
 8 They acted in accordance with their training.
 9 A. That's correct, yes.
 10 Q. They not only did everything expected of them, as you
 11 have said --
 12 A. That's correct.
 13 Q. -- but they went beyond what was expected of them.
 14 A. I believe they did, yes.
 15 Q. They knew the dangers of those devices if they were to
 16 detonate, and not only did they stay within 100 yards of
 17 them; most of them were within 25 yards of those
 18 devices. You have told this jury that less than
 19 25 yards from an explosive device, it is only safe to be
 20 at that distance if in an armoured vehicle.
 21 A. That's correct, yes.
 22 MR HORWELL: Thank you.
 23 MR HOUGH: Those are all the questions we have for you,
 24 Mr Sheridan. Thank you very much for giving evidence.
 25 A. Thank you.

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1 THE CHIEF CORONER: Mr Sheridan, can I just say a couple of
 2 things.
 3 Obviously, your officers performed extremely well.
 4 One of the things that you were asked about by Mr Hough
 5 is about being where they didn't. Obviously, you can
 6 train people, you can do classroom training, you can do
 7 exercises, but very often, confronted with the reality,
 8 that's what shows, as it were, how the training has
 9 worked, whether there are points going forward that need
 10 to be addressed.
 11 In particular, you've said about the role played by
 12 V134 that, bearing in mind the stress of being in that
 13 particular role with everything else going, it's in
 14 a sense a testament to her abilities that she performed
 15 as well as she did.
 16 You've indicated in respect of all of those who were
 17 actually confronting these devices they acted with
 18 commendable bravery, not knowing whether they were live
 19 devices or not. But, again, that must be testament to
 20 the training that you and many others delivered to these
 21 people.
 22 A. Sir, yes, it is with immense pride that these officers
 23 have acted in the way they have acted. They've put
 24 themselves in huge danger, sometimes on their own going
 25 through the marketplace, not knowing the full extent of

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1 the threat. Officers at all levels that I've seen and
 2 read on this night at this time acted immensely well
 3 under huge stress and strain.
 4 As the head of training, if you like, for the
 5 firearms world in the Met, it makes me incredibly proud
 6 to have, in my mind, know: well, at least we've given
 7 them the right training, and we'll continue to do that
 8 and review that as we go on. So thank you.
 9 THE CHIEF CORONER: Thank you very much indeed.
 10 Mr Hough, I'm going to suggest we break there
 11 because there's something that I need to do during the
 12 lunch break. So we'll break.
 13 Members of the jury, we'll sit again at 2 o'clock.
 14 You may or may not have seen, there were quite a lot of
 15 people gathered outside the front of the building when
 16 you arrived this morning. I don't know whether you go
 17 out of the building for lunch or if you are staying in.
 18 If you are going out, you might just want to make your
 19 own assessment of what the situation is like out there
 20 and obviously just keep your wits about you if you go
 21 outside. Just that by way of warning. We'll see you
 22 again at 2 o'clock.
 23 (In the absence of the jury)
 24 THE CHIEF CORONER: I think, in fact, it may have calmed
 25 down outside, but, again, if any of you are going out of

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1 the building, just be mindful there are quite a few
 2 people out there.
 3 (12.35 pm)
 4 (The Luncheon Adjournment)
 5 (2.08 pm)
 6 (In the presence of the jury)
 7 THE CHIEF CORONER: Good afternoon, everyone.
 8 Mr Hough.
 9 MR HOUGH: Sir, Mr John Brown, please.
 10 RETIRED SUPERINTENDENT JOHN BROWN (sworn)
 11 THE CHIEF CORONER: Good afternoon, Mr Brown. Please take
 12 a seat or stand, whichever you prefer. You will
 13 probably just need to make sure the microphone is --
 14 great, thank you.
 15 Questions by MR HOUGH QC
 16 MR HOUGH: Would you please give your full name for the
 17 court?
 18 A. John Andrew Brown.
 19 Q. Mr Brown, you appreciate I'm asking you questions first
 20 on behalf of the Coroner.
 21 Were you, until your retirement, an officer of the
 22 City of London Police?
 23 A. Yes.
 24 Q. At what rank did you retire from that force?
 25 A. Temporary inspector.

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1 Q. When did you retire?
 2 A. August 2018.
 3 Q. In June 2017, what was your role in the City of London
 4 Police?
 5 A. I was a chief firearms instructor for the City of London
 6 Police.
 7 Q. When had you taken up that role?
 8 A. I took up that role about December 2003.
 9 Q. Had you, prior to that, had over ten years of experience
 10 as a firearms officer yourself?
 11 A. Yes, I had.
 12 Q. Are you, like Mr Sheridan, giving evidence today on
 13 relevant policies, practices and training governing
 14 firearms officers?
 15 A. Yes.
 16 Q. Will you also be providing your assessment of the
 17 actions of the three City of London Police ARV officers
 18 who were engaged in the confrontation with the
 19 attackers, by reference to their training?
 20 A. Yes.
 21 Q. You made a number of statements in relation to the
 22 attack, and I will be questioning you by reference to
 23 your two longer statements, one dated 22 February of
 24 this year, one dated 21 March of this year. You may
 25 refer to those as you wish.

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1 A. Thank you.
 2 Q. First of all, can I ask you about firearms roles within
 3 the City of London Police. Is it right that there are
 4 a number of officers within the force who have received
 5 firearms training and have qualified as authorised
 6 firearms officers?
 7 A. Yes.
 8 Q. May those officers be deployed in a whole range of
 9 different roles within the force?
 10 A. Yes.
 11 Q. We've heard about armed response vehicle officers. Are
 12 those officers all individuals who have completed their
 13 AFO, authorised firearms officer, training?
 14 A. Yes, AFO course and they would also go on, to become
 15 an ARV officer, a course as well.
 16 Q. So there's an additional course for ARV officers. Is
 17 there, within the City of London Police, a tactical
 18 firearms group in which ARV officers are posted?
 19 A. Yes.
 20 Q. We've heard about counter terrorism specialist firearms
 21 officers a rank above ARV officers in terms of their
 22 training and level of skill. Does the City of London
 23 Police have any officers in that role?
 24 A. No, that role was done away with and we use the
 25 Metropolitan Police specialist arms officers now.

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1 Q. Now, some questions about training generally.
 2 Mr Sheridan has already explained the structure of
 3 firearms training and the way that forces are licensed
 4 to deliver training by the College of Policing. You,
 5 I think, were in court during his evidence.
 6 A. Yes.
 7 Q. Does everything that he said about the structure of
 8 training and the way it's licensed and delivered apply
 9 also to the City of London Police?
 10 A. In exactly the same way.
 11 Q. To become an authorised firearms officer, does
 12 an officer of the City of London Police undergo
 13 a training course of between 50 and 60 hours?
 14 A. 50 and 60 hours would be for an AFO, but there's
 15 120 hours contact time for an ARV officer.
 16 Q. So a basic course of 50 to 60 hours for an authorised
 17 firearms officer and then a total training course of
 18 120 hours for an ARV officer?
 19 A. Roughly, yes.
 20 Q. A similar length of --
 21 A. That's contact. Sorry, that's contact time. The course
 22 is 10 weeks for an ARV officer, five weeks for an AFO
 23 officer.
 24 Q. As with the Metropolitan Police, do firearms officers in
 25 the City of London Police have to do refresher training

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1 every year?
 2 A. Yes.
 3 Q. Are the records of that training kept and reviewed
 4 periodically by the chief firearms instructor of the
 5 force?
 6 A. Yes, it's on a continual basis and once per year it's
 7 gone over in depth.
 8 Q. As with the Metropolitan Police officers, do ARV
 9 officers in the City force have regular tactical
 10 training?
 11 A. Yes.
 12 Q. What sorts of subjects does the tactical training for
 13 City officers include?
 14 A. Tactical training will cover less lethal options,
 15 subjects in vehicles, subjects in buildings, subjects on
 16 foot and some other extra bolt-ons that we would put in
 17 that were local with our STRA.
 18 Q. As with the Metropolitan Police officers, does training
 19 include class lessons and practical exercises?
 20 A. Yes.
 21 Q. We've heard that practical exercises can also be done in
 22 conjunction with Metropolitan Police and
 23 British Transport Police firearms officers.
 24 A. Yes.
 25 Q. How regularly do officers in the City Police have

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1 practical exercises in relation to marauding terrorist
 2 attack incidents of the kind that your officers faced on
 3 3 June?
 4 A. They would do it at least two or three times a year and
 5 they'd also, as we've discussed, exercise with
 6 Metropolitan Police and British Transport Police.
 7 Q. Overall, are there any important differences between the
 8 content of training delivered to City of London armed
 9 response officers and Metropolitan Police armed response
 10 officers?
 11 A. For ARV, not at all. The City ARV and the Met ARV work
 12 in conjunction with each other and we work in both of
 13 each others post areas, almost to be using similar cars.
 14 Q. So an ARV officer from either force one would expect to
 15 have the same training as his colleague in the other
 16 force and have the same level of skills.
 17 A. Yes.
 18 Q. Did you, for your force, like Mr Sheridan for his, check
 19 the training records of the armed response vehicle
 20 officers who had been involved in the confrontation with
 21 the attackers?
 22 A. Yes.
 23 Q. So that, for the City of London Police, is BX44, BX45
 24 and BX46.
 25 A. Yes, that's correct.

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1 Q. Were they all up to date with their training?
 2 A. They're all up to date with their training.
 3 Q. We've also heard that an ARV officer's training extends
 4 to first aid and a variety of medical interventions in
 5 the Metropolitan Police force. Is the same true for
 6 City of London officers?
 7 A. Exactly the same. We follow the same module of D13
 8 enhanced.
 9 Q. As with Metropolitan Police officers, is it common for
 10 City officers to render first aid immediately, even to
 11 people with whom they have been in an engagement?
 12 A. Yes, once it's safe to do so, they will perform and give
 13 first aid.
 14 Q. Next, marauding terrorist incidents. The jury have
 15 heard about Operation Plato, the procedures and the
 16 practices for responding to such an incident. In
 17 a sentence or two, what is the objective of firearms
 18 officers on the scene once a Plato declaration has been
 19 made?
 20 A. To identify, locate and then confront the threat.
 21 Q. With a view to what ultimate objective?
 22 A. Ultimate? Sorry, could you ...
 23 Q. With a view to what ultimate objective? What's the
 24 purpose of confronting and neutralising the threat?
 25 A. To make everybody safe, to prevent loss of life, further

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1 loss of life.
 2 Q. Now, in training scenarios, are officers trained to
 3 carry on a search for suspects until the threat has been
 4 satisfactorily identified and suppressed?
 5 A. Yes, if there's still a threat of further loss of life,
 6 we will continue to identify, locate and confront to
 7 prevent further loss of life.
 8 Q. So, for example, when we heard from one or two of the
 9 Metropolitan Police officers that they had to press on
 10 past injured people, looking for attackers, that was in
 11 accordance with the training that is delivered on
 12 marauding terrorist attacks.
 13 A. Yes, that's in accordance with the training.
 14 Q. We've heard from Mr Sheridan that regarding first aid,
 15 Metropolitan Police officers are trained to engage in
 16 treating people only when it's safe to do so. Is that
 17 true of your officers as well?
 18 A. Yes, the first aspect they'll deal with in any first aid
 19 scenario will be to deal with the danger first, whether
 20 it be road traffic danger or the subject they're dealing
 21 with is dangerous.
 22 Q. In the event of dealing with somebody wearing
 23 an apparent explosive device who has been injured,
 24 what's the proper approach to first aid?
 25 A. It would be to deal with the danger, so they would go

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1 behind hard cover and wait until they knew that the
 2 explosive device was safe for them to perform first aid.
 3 Q. How could they be satisfied that the explosive device
 4 was safe; how would that be established?
 5 A. That would be established by an expert who knows what
 6 that explosive device is and if it's viable or not
 7 viable.
 8 Q. So an ordnance disposal officer.
 9 A. Yes.
 10 Q. We've heard that armed response vehicle officers, like
 11 other officers, carry police Airwave radios, which have
 12 numerous channels. We've heard also that there is
 13 a channel, City Ops 1, for officers operating in the
 14 City of London area.
 15 A. Mm-hm, yes.
 16 Q. There is also, we've heard, an armed response channel
 17 operated by the Metropolitan Police to which a number of
 18 the City units were also tuned during this incident.
 19 Would you expect armed response officers of the City of
 20 London Police to be tuned into that channel?
 21 A. They would be tuned into that channel within the
 22 vehicle. Once they would get out that vehicle. It
 23 would be whatever channel they'd been, not ordered, but
 24 it had been decided or declared for them to monitor on
 25 their personal radios.

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1 Q. Now, the incident that took place in Borough Market was
2 within the Metropolitan Police area.
3 A. Yes.
4 Q. The City of London Police jurisdictional area ended just
5 north of that. Is it common practice for armed response
6 vehicles of the City of London Police to attend
7 incidents in the Metropolitan Police area and vice
8 versa?
9 A. Yes.
10 Q. May I now ask you about the actions of the ARV officers
11 in the initial confrontation and your assessment of
12 those, which you address in your third witness statement
13 from page 2 onwards.
14 Now, like Mr Sheridan, have you watched CCTV of the
15 events in Stoney Street?
16 A. Yes.
17 Q. Have you read statements of the officers and the
18 ballistics report?
19 A. Yes.
20 Q. Have you read the Independent Office of Police Conduct
21 report?
22 A. Yes.
23 Q. With a view to all of that, have you made your own
24 assessment, your own critical assessment, of the
25 officers' actions?

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1 A. Yes.
2 Q. You're aware, I think, then, that the three City of
3 London officers we're concerned with, BX44 to BX46, were
4 in a single armed response vehicle with call sign Trojan
5 City 1.
6 A. Yes.
7 Q. That they headed to the scene at London Bridge in
8 response to emergency calls, travelling from the
9 Shoreditch area.
10 A. Yes.
11 Q. You know, I think, that they heard an Operation Plato
12 declaration when they were near the scene --
13 A. Yes.
14 Q. -- and that they turned into Stoney Street after being
15 directed by bystanders that people were being attacked
16 there.
17 A. Yes, that's correct.
18 Q. They were making their way to a scene in the
19 London Bridge area, but they had their windows down and
20 responded to what the people in the area were saying,
21 pointing them towards Stoney Street as the scene of
22 an active attack.
23 A. Yes.
24 Q. It may be obvious, but was it right for them to do that?
25 A. Absolutely. They're going in for information and

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1 intelligence that's available to them and that was good
2 intelligence that would be coming from members of the
3 public at the time.
4 Q. Now, on their arrival in Stoney Street, what the
5 officers immediately perceived was some sort of fracas
6 taking place in front of them. BX46 described it to the
7 jury as looking at first blush like a bar fight. The
8 officers exited the vehicle quickly, looking to find and
9 confront suspects.
10 In that situation, would you have expected the
11 officers to get out of their vehicle quickly and go out
12 on foot?
13 A. Yes, that's according to the training, to arrive on
14 scene and go and deal with the situation that's in front
15 of them outside the vehicle.
16 Q. If we look at some images, please, just to remind
17 ourselves of the scene. First of all, {PH3886/1}. This
18 is a view from the north end of Stoney Street looking
19 out of an upstairs window towards the south end. We can
20 see that the armed response vehicle has arrived at 22.16
21 that Saturday night, and BX46 is just in the process of
22 getting out of the passenger door.
23 A. Yes.
24 Q. Then {DC0001/14}, we can see the same scene from the
25 opposite direction, with BX46 getting out of the

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1 vehicle. Now, we know what was happening on the right
2 in the area of the three marked attackers was an attack
3 on a member of the public, Mr Filis. I think it's right
4 that the City Police officers didn't immediately
5 appreciate that an attack was taking place.
6 A. Yes, that's correct.
7 Q. Then {PH3891/1}. We can see that BX46 has got out of
8 the vehicle and is moving across the front of it towards
9 the men who are closest to him, and one of them, wearing
10 a football shirt, Khuram Butt, is starting to move
11 towards him; do you see that?
12 A. Yes.
13 Q. Then if we work through this sequence of shots that
14 follow, {PH3892/1}. Now we see the officer moving
15 forward and Butt starting to advance on him, the officer
16 with his weapon raised. {PH3893/1}, the officer is --
17 has moved forward a little, but appears to be slowing in
18 his movement --
19 A. That's correct.
20 Q. -- with Butt moving towards him, arm raised. We know
21 that Butt was carrying a knife.
22 {PH3894/1} we can see that the officer appears to be
23 stationary with his legs apart and Butt coming on
24 towards him, arm still raised.
25 A. Yes.

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1 Q. {PH3895/1}, the officer appears to have moved backwards,
2 maintaining a gap.
3 {PH3896/1}, the officer has backed fully across
4 the road, Butt continuing towards him.
5 A. Yes.
6 Q. The other two attackers over to the left, one in
7 a striped top, one in black, are starting to move
8 towards the officers BX44 and BX45, who have come out of
9 the other side of the ARV.
10 A. Yes.
11 Q. So that's the background. If we leave that image on
12 screen, BX46's evidence to the jury was that he shouted
13 out, "Armed police" when he got out of the vehicle, at
14 which Butt moved towards him with knife raised and
15 wearing what BX46 thought appeared to be a suicide vest.
16 That he, BX46, shouted for Butt to stay still while
17 himself moving backwards to keep open a reactionary gap.
18 He said that he moved back, maintaining the gap, and as
19 Butt closed it towards him, he fired. He said that he
20 saw Butt's knife arm up and described a fear that Butt
21 would kill him unless he fired.
22 Now, against that background and with your knowledge
23 of the events, what's your assessment of his conduct by
24 reference to his training and proper practice?
25 A. BX46 has gone out to see what he thinks is a threat, or

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1 that looks it. I take it that he's seen the stabbing
2 movements on the victim on the floor, gone towards that.
3 You can then see that Butt moves towards him and tells
4 the armed police now to stand still. BX46 has then
5 tried to create a reactionary gap to give himself time,
6 distance and space to assess the threat further. Butt
7 keeps coming forward to him. So in self-defence, to
8 protect his own life, fearing for his own life, he has
9 opened fire on Butt, and that is all in accordance with
10 his training.
11 Q. In that situation, could BX46 have used any less lethal
12 option, such as either a taser or some other form of
13 weapon?
14 A. With the time span that's gone on, we had no time to get
15 any taser out. The weapon is a large knife, which the
16 taser would probably be ineffective for, and also, Butt
17 is wearing what BX46 believes to be an IED, which the
18 taser could quite easily activate it. So it would not
19 be a good viable option in these circumstances.
20 Q. So the taser wasn't an option both because there wasn't
21 enough time to get it out, because it will probably be
22 ineffective against the type of attack --
23 A. Yes.
24 Q. -- and because it might detonate an explosive device.
25 A. Yes.

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1 Q. Would it have been any sort of realistic option for BX46
2 to use a hand-to-hand weapon, a baton or a spray?
3 A. No, not in these circumstances, not up against a knife,
4 and a person -- a perpetrator wanting to use a knife
5 against him, hand-to-hand combat would not work.
6 Q. It may be an exceedingly obvious question, but why not?
7 A. Because he's -- the knife is going to cut his hands if
8 he was to put his hands on him. The spray, would not
9 know if it's going to be effective. By the time we'd
10 gone through a force continuum of working out whatever
11 the threats were, it was probably too late for him and
12 he would have suffered some form of serious injury or
13 been killed himself.
14 Q. By which time, the attacker would also have access to
15 the officer's weapons.
16 A. An officer's weapons, yes, correct.
17 Q. Can we now turn to BX44, and if we can bring up for this
18 purpose {DC0001/15}. If we focus on the upper image,
19 BX44 is identified in this image. He was the offside
20 rear passenger of the ARV. His evidence was that he saw
21 the attackers coming towards himself and his colleagues,
22 as we see in the image here. That he fired at, first of
23 all, Butt and then at Redouane as they were closing down
24 his fellow officers, and that he finally fired at Zaghba
25 as Zaghba was closing on him, firing his final shots as

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1 Zaghba was looming over him.
2 If we move to the next page, please {DC0001/16}, we
3 can see that in the next moment after he described
4 firing at Butt, Redouane and Zaghba were both moving at
5 speed towards himself and his colleague standing next to
6 him.
7 A. Yes.
8 Q. He described operating a hierarchy of threat whereby he,
9 first of all, fired at Butt because Butt was closest to
10 one of his group --
11 A. Yes.
12 Q. -- then at Redouane who was next closest, and finally at
13 Zaghba. He described falling back as Zaghba came on,
14 and firing the final shot at him when he, BX44, was on
15 the ground.
16 We can see his position if we look at {DC7181/291}.
17 If we look at the upper image, we can see that he is
18 down on the floor with his arms holding his weapon and
19 Zaghba collapsed directly next to him.
20 What assessment would you make of BX44's action in
21 this engagement?
22 A. BX44's action is in accordance with his training. He's
23 not really had much time to think about Zaghba because
24 Zaghba's got on top of him. For his hierarchy of
25 threat, he's dealt with what he saw, using his -- the

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1 national model of information and intelligence , so it
 2 would be a cycle of -- a cyclic use of the national
 3 decision model. It would be going very, very quickly at
 4 that time. However, if he's seen Butt as a threat to
 5 his colleague, to save the life of his colleague, he's
 6 engaged there, and then BX45 has saw a threat to him and
 7 engaged there. By that time, Zaghba is on top of BX44
 8 and he's falling , and missed it. That's how they've got
 9 so close he's actually shooting him, as he's got within
 10 a very close distance.

11 So within fear of his own life , he's engaged two
 12 suspects prior and Zaghba as he's fallen over, he has no
 13 recourse, so it's all in accordance with his training .

14 Q. Was it not an option for him, just as with BX46, to use
 15 any weaponry less lethal than that?

16 A. For all the exact same reasons, and his time, distance
 17 and space. He did not have any time, distance and
 18 space.

19 Q. Then finally BX45, the driver. If we go back to
 20 {DC0001/15}, BX45 gave evidence that he had just got out
 21 of the vehicle when he became aware of men with knives,
 22 one of whom he thought had an apparent explosive device
 23 on him, bearing down on the officer and his colleagues,
 24 that he fired at the man coming most immediately towards
 25 him and that the incident was over very quickly indeed

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1 from his perspective.

2 Now, having read his statement and seen the footage,
 3 what's your assessment of the legitimacy of his actions?

4 A. BX45 was engaged in self-defence for he is at immediate
 5 risk of unlawful violence or death from being attacked.

6 So it's all in accordance with his training .

7 Q. Again, were less lethal options not realistic for the
 8 same reasons as with the other officers ?

9 A. Again, for all the same reasons as before.

10 Q. We can take that off screen now.

11 May I ask you, next, about the officers' perceptions
 12 of the improvised explosive devices. We can put on
 13 screen a number of still images of the attackers wearing
 14 the devices.

15 First of all , {AV0071/3}. Now, we can see here the
 16 first of a number of images I'm going to show you, which
 17 depict the apparent bomb vests around the midribs of
 18 the suspects, and I'm going to show you a number so you
 19 can see how they might have been perceived.

20 Next, {AV0071/4}, we can see Zaghba's relatively
 21 close up.

22 {AV0071/10}.

23 {AV0071/18}.

24 {AV0071/46}, where we can see Zaghba's just on the
 25 front right of the image.

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1 {AV0071/47}, where we can see Butt's in a similar
 2 position.

3 Then if we can look at these items after they'd been
 4 removed by the explosives officer , first of all
 5 {PH0435/1}. This is an image of two of the bomb vests
 6 after being cut off and thrown down by the explosives
 7 officer .

8 Then {DC0001/62}, images of all three after they had
 9 been taken away from the scene.

10 Having viewed the images of the suspects wearing
 11 those devices, do you consider it was reasonable for
 12 officers facing them to regard them as likely to be
 13 real?

14 A. Yes. Looking at those photographs, for me, to me, they
 15 looked real within the photographs, and for them to
 16 think that they're viable devices, I would say yes.

17 Q. So the jury have heard from Mr Sheridan that officers
 18 are trained to treat as viable anything that looks
 19 realistically like an explosive device. Would you say
 20 in addition that these devices, in the conditions,
 21 looked plausible?

22 A. They looked plausible , yes.

23 Q. Now, do officers receive specific training or guidance
 24 about how to deal with attackers with suspected bomb
 25 vests, for example methods of firing and targeting of

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1 firing ?

2 A. Yes. For the target area, if somebody is wearing
 3 an IED, it may be the suggestion would be to possibly
 4 try for a head shot rather than shoot, because
 5 an officer wouldn't know if a bullet would set the
 6 device off, because the devices are homemade, presumably
 7 very fragile and unpredictable.

8 Q. The jury have heard that police officers ordinarily are
 9 trained to shoot for the central body mass, the torso,
 10 because it's a large area, the largest area likely to
 11 achieve incapacitation .

12 A. Yes.

13 Q. But when somebody is wearing a device of this kind, that
 14 will often be around the torso.

15 A. Yes.

16 Q. Therefore, in order to avoid setting it off, and also to
 17 achieve swift incapacitation , prevent detonation,
 18 officers are trained to fire for the head.

19 A. Yes.

20 Q. Are officers given any particular guidance about what to
 21 do when a suspect wearing such a device has gone down,
 22 has been shot or otherwise apparently incapacitated?

23 A. Until the device has been negated and it's no longer
 24 viable, they would be expected to put in a cordon, and
 25 for that sort of cordon, it would be 100 metres for

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1 a person-borne IED.

2 Q. Are officers given guidance about the methods of
3 detonation which can be used to set off a device of this
4 kind?

5 A. Yes, a device could be set off by a switch by the
6 subject. It could be set off by a third party. It
7 could be set off by a timer device, and there are
8 probably numerous other ones I haven't got time to think
9 of, but yes, quite easily a number of ways.

10 Q. In particular, would movements of the upper body,
11 movements of the arms, be significant as an indication
12 that there might be an attempt to activate it?

13 A. Absolutely. I would expect a firearms officer to be
14 watching the movement of the arms if they had
15 a person-borne IED.

16 Q. Are officers given any advice about what the blast
17 radius of a person-borne IED can be?

18 A. Yes.

19 Q. To the extent you are able to say, what are officers
20 told about that?

21 A. Not to the exact amount of metres, but their cordon
22 would be going back to 100 metres, behind hard cover.

23 Q. We saw that the officers were taking cover behind the
24 engine block of an ARV, but would that be regarded as
25 satisfactory hard cover?

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1 A. In those circumstances that they're left with, it's the
2 best of all the options available. But it wouldn't be
3 totally satisfactory.

4 Q. We can take that image off screen now.

5 The jury have heard that Mr McLelland very sadly was
6 injured as a result of a bullet fired in the initial
7 confrontation, probably by BX45 or BX44 firing on Butt.
8 Is collateral injury of this kind a risk in any firearms
9 situation?

10 A. Yes, it's got to be considered, and all firearms
11 officers are trained to consider collateral damage for
12 their backdrop, over-penetration or a miss.

13 Q. So officers are trained to consider it, to minimise it,
14 but it's a risk that can't be obliterated?

15 A. Yes.

16 Q. Can I now ask you about decisions made by City of London
17 officers to fire after the initial engagement. We can
18 bring up on screen {DC0001/48}. We can see that in the
19 immediate aftermath of the engagement BX46, BX45 and
20 BX44 held cover on the suspects. Do we see there at
21 {DC0001/49} that they then withdrew, having seen the
22 apparent explosive devices? If we look at {DC7181/303},
23 we can see their initial positions on a more focused
24 shot before they withdrew. Then, please, can we have
25 {DC7248/15}. We can see that two of the officers, BX44

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1 and BX46, were withdrawn to a position north of the
2 suspects behind some pillars further up Stoney Street.

3 What's your view of the attempts that they made to
4 find cover while maintaining their firearms trained on
5 the suspects?

6 A. Because the suspects are around, they've got
7 person-borne IEDs on them, if you've still got members
8 of the public at risk, you've still got to stay in the
9 area and make the best of the cover that's available,
10 and it looks like they've been moving around to still
11 keep their visual contact with the subjects whilst also
12 trying to give themselves the best cover available
13 should the IEDs go off.

14 Q. If we go to {DC7248/19}, please. At 10.23, shots were
15 fired by BX44 from his position behind that pillar,
16 towards Khuram Butt. Then {DC7248/21}, please, further
17 shots were fired by BX44 from that position, the upper
18 image showing shots at 22.28 and the lower image at
19 22.29.

20 On each of those occasions, BX44 described having
21 seen movements of Butt's hands as he was looking at him
22 through an EOTech magnified sight. It's also the case
23 that other officers fired during the first of those
24 occasions from the south, having seen Butt appearing to
25 push himself up into a type of press-up position.

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1 Having read all the accounts of the officers,
2 including in particular BX44, what's your assessment of
3 his decision to fire on those occasions?

4 A. BX44 would be looking through the ACOG sight of his
5 weapon, which is four times magnification. So
6 therefore, within the picture, we would not be able to
7 see within the videos the stills of movements. We see
8 slight movement, he would see a lot of movement. He
9 would know exactly what was happening, and I believe he
10 believed that he was trying to activate the device. So
11 the immediate threat of life, threat to members of the
12 public in the vicinity and the officers there, that's
13 why he would engage and that would be in accordance with
14 his training.

15 Q. On the first occasion that he fired, officers with
16 an entirely different perspective also fired at exactly
17 the same moment. Does that in any way contribute to
18 your view?

19 A. Yes, because they'll all be thinking the same thing:
20 that he's going to set this device off and there's a lot
21 of people at risk.

22 Q. Very shortly after the second occasion he fired, as
23 we'll hear, BX46 saw Butt moving again and fired on him.
24 Does that have any influence on your view?

25 A. The fact that he's still moving, he's been told to

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1 move -- told to stay still and continues to move, there
 2 would be a fear, because of the proximity they are to
 3 that IED and the proximity of the people inside the
 4 Wheatsheaf public house to Butt, if that IED was to go
 5 off, there would be a lot more people injured or killed .
 6 Q. Now, during the evacuation of the Wheatsheaf pub, BX46,
 7 the jury heard, was maintaining firearms cover on
 8 Khuram Butt from a very short distance, a small number
 9 of metres.
 10 While people were leaving, BX46 described seeing
 11 Butt begin to raise his head and BX46 said that he could
 12 only see Butt's right hand because his left hand was
 13 obscured. At that point, he described taking an aimed
 14 shot at Butt's head. He said he was concerned about the
 15 risk of detonation and the risk of death to the numerous
 16 people evacuated from the pub at that time. He said he
 17 aimed to hit the part of the body furthest from the
 18 device that would still incapacitate, namely the head.
 19 What's your view of his conduct?
 20 A. That conduct is in accordance with his training and the
 21 threat to life of all the people coming out of the
 22 Wheatsheaf pub, himself and his colleagues is quite
 23 great at that time due to the proximity and as they were
 24 in open cover.
 25 Q. Like your colleague, Mr Sheridan, you are and have been

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1 no stranger to identifying and criticising the conduct
 2 of firearms officers both in practices and in real life .
 3 A. Yes.
 4 Q. Is it right to say that you, like him, found nothing
 5 substantial to criticise in these officers' actions?
 6 A. Yes.
 7 Q. Is it also right that you have found a number of
 8 instances of them acting in a praiseworthy and
 9 courageous manner?
 10 A. Very much so, absolutely, especially the way they've had
 11 to stay with minimal cover, to remain in place to
 12 protect members of the public and also to get people out
 13 the Wheatsheaf public house.
 14 Q. May I move on to the arrival of the explosives officers .
 15 The arrangements for the explosives officers to arrive
 16 were handled by the Metropolitan Police command
 17 structure. I gather that's normal.
 18 A. That's normal, yes.
 19 Q. Until those officers had examined the devices, the
 20 officer's view was that it wasn't safe for them to
 21 examine the suspects more closely or to consider first
 22 aid. Based on your previous answers, would you endorse
 23 that view?
 24 A. Yes, I do.
 25 Q. May we deal finally with the evacuation of the

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1 Wheatsheaf. A decision was made by two City of London
 2 officers, BX46 and BX45, to evacuate the Wheatsheaf. If
 3 we look, please, at {DC7181/308}, we'll see a still
 4 showing them moving across the road to do that. BX45
 5 held a ballistic shield while BX46 kept cover on Butt
 6 and BY5 ushered people out at speed, but still a process
 7 taking some minutes.

8 They've described their rationale was that they
 9 wanted to get people away from a building with many
 10 windows, near to a suspect with an apparent IED, and
 11 that they'd heard calls from the inside of the building
 12 referring to someone dying inside which made the
 13 decision time critical .

14 What was your assessment of that decision?

15 A. The decision is, for me, a very brave decision. The
 16 policy says go back off to 100 metres. They are not
 17 able to back off to 100 metres. There's a person-borne
 18 IED sitting outside the pub on Butt. We've got a person
 19 inside the public house that is injured. We don't know
 20 how badly injured they were.

21 Using the MDM, a decision to do nothing is not
 22 an option. So they would have gone round. They had to
 23 do something, so they've put themselves quite well on
 24 offer using the best they've got, which is a ballistic
 25 shield which probably wouldn't have done much for them

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1 had that IED gone off .
 2 So a brave decision, the right decision, and the
 3 result is how it is and people's lives are saved. So
 4 what they did was in accordance with their training and
 5 what was expected of them, over and above what was
 6 expected of them.
 7 Q. Of course, Mr McLelland was, in fact, saved.
 8 A. Yes.
 9 MR HOUGH: Thank you very much. Those are all my questions.

10 I'll just check whether others have any.

11 Questions by MS BARTON QC

12 MS BARTON: Given the speed of these events and the actions
 13 of Butt, Redouane and Zaghba, was there really any
 14 realistic opportunity for the officers to use anything
 15 other than their carbines?

16 A. None at all .

17 Q. Because when they exited the car, those were the weapons
 18 which they already had in their hands; is that correct?

19 A. Yes.

20 Q. You've told us about the risk of collateral damage in
 21 an event of this type, and sadly Mr McLelland was shot.
 22 Would you expect officers in a scenario other than this,
 23 and where the option is open to them, to pick
 24 an appropriate backdrop for a shot?

25 A. If they have the time and the opportunity is there.

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1 However, in this situation, they were given no time
 2 whatsoever to cover that.
 3 Q. So sadly, because of the speed of events and the
 4 relative positions of those involved, the ideal scenario
 5 couldn't be created here.
 6 A. No, it couldn't.
 7 Q. So do you have any criticism of them for taking the
 8 shots they did in the position they were in?
 9 A. None whatsoever. They did what they could do in the
 10 circumstances.
 11 MS BARTON: Thank you.
 12 MR HOUGH: Thank you, Mr Brown. Those are all the questions
 13 we have for you. Thank you for giving evidence.
 14 THE CHIEF CORONER: Thank you very much indeed, Mr Brown.
 15 Thank you.
 16 MR HOUGH: That's all the evidence for today.
 17 THE CHIEF CORONER: Yes.
 18 MR HOUGH: We have evidence tomorrow, which will certainly
 19 be completed within the morning, from two pathologists.
 20 THE CHIEF CORONER: Yes.
 21 Well, members of the jury, there we are. As I say,
 22 we're on track. So tomorrow, we turn to the pathology,
 23 and I suspect there may be a little bit of tidying up.
 24 I think, Mr Hough, our plan is we will finish
 25 tomorrow morning at some stage before lunch, all being

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1 well, somewhere around 12.30. That's just to give you
 2 a heads up for tomorrow.
 3 On Monday, members of the jury, we will then turn to
 4 my summary of the evidence and my directions to you. So
 5 that's, again, just to remind you that we remain, so far
 6 as I can see, on course with the timetable we set at the
 7 beginning.
 8 Thank you very much. We will see you all tomorrow
 9 at 10 o'clock.
 10 (In the absence of the jury)
 11 MR HOUGH: Sir, may I just raise one matter before you rise.
 12 THE CHIEF CORONER: Yes.
 13 MR HOUGH: After the two pathologists, we're going to be
 14 hearing from Detective Superintendent Riggs.
 15 THE CHIEF CORONER: Yes.
 16 MR HOUGH: She will be attesting to the details, the
 17 personal details, for each of the attackers required for
 18 registration of death formalities, as to which the
 19 records of Inquest need to include findings based on
 20 evidence.
 21 She will also be in a position to deal with any
 22 remaining questions --
 23 THE CHIEF CORONER: Yes.
 24 MR HOUGH: -- which can be answered in her capacity as the
 25 SIO. If any interested person does have any further

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1 questions to raise from her, we would be grateful if
 2 they were notified to solicitors to the Inquest by the
 3 end of today --
 4 THE CHIEF CORONER: Yes.
 5 MR HOUGH: -- so that Detective Superintendent Riggs can be
 6 given advance notice of those, and she can be,
 7 therefore, as helpful as possible.
 8 THE CHIEF CORONER: Thank you. I'm looking around and
 9 I'm sure, looking at the faces of those in court, that
 10 if there are any such topics, that notice will be given.
 11 It may be that there aren't any.
 12 MR HOUGH: It may well be.
 13 THE CHIEF CORONER: In terms of tomorrow, as I have
 14 mentioned to you, there is something I have been asked
 15 to do at 12.30, which I don't see as being a problem.
 16 If it is, I will make some alternative arrangements, but
 17 I hope with a fair wind, we will get through the
 18 evidence by or at about 12.30.
 19 MR HOUGH: Yes.
 20 THE CHIEF CORONER: In terms of Monday, just really a heads
 21 up for everyone: it's likely that I will ask the jury
 22 probably to come for 12 o'clock on Monday and
 23 I anticipate that we will sit probably at 11 o'clock,
 24 just to deal with any submissions there may be. Again,
 25 I'm just mentioning that now so that everyone can tell

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1 me whether, in fact, it looks fine in terms of timing.
 2 MR HOUGH: From my discussions with my learned friends, the
 3 submissions are unlikely to detain you for as much as
 4 an hour, let alone beyond.
 5 THE CHIEF CORONER: Right. Well, it may be that I'll tell
 6 the jury to come at 11.30, but we can fine-tune that.
 7 MR HORWELL: I would have thought so, sir, yes.
 8 THE CHIEF CORONER: Mr Horwell, what I've got in mind is
 9 obviously, I will be summarising the evidence the jury
 10 have listened to. My gut feeling at the moment is that
 11 that's probably going to take me until lunchtime on
 12 Monday and then Monday afternoon. I could then deal
 13 with the legal directions and send the jury out, but my
 14 preference at the moment is to do the legal directions
 15 first thing on Tuesday morning and then ask the jury to
 16 retire. So I think that's more likely to be productive.
 17 Obviously, the draft of any directions that
 18 I prepare, I shall send to all IPs to have a look at --
 19 MR HORWELL: Thank you.
 20 THE CHIEF CORONER: -- once I have heard the submissions,
 21 but I think we all know what it is likely to say.
 22 MR HORWELL: Thank you, yes.
 23 THE CHIEF CORONER: I'm looking at Mr Radcliffe. He looks a
 24 bit worried, but I think ...
 25 MR RADCLIFFE: I'll be very brief.

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1 THE CHIEF CORONER: Very good. I'll rise .
 2 (3.02 pm)
 3 (The court adjourned until 10.00 am on Friday,
 4 12 July 2019)
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