

<p>1 Friday, 13 August 2021</p> <p>2 (10.00 am)</p> <p>3 (The hearing was delayed)</p> <p>4 (10.15 am)</p> <p>5 (In the absence of the jury - extracted)</p> <p>6 (11.17 am)</p> <p>7 (In the presence of the jury)</p> <p>8 MR JUSTICE HILLIARD: Good morning, ladies and gentlemen.</p> <p>9 Now, I know you've been informed about juror 5. Can</p> <p>10 I just say this, as I am sure I hope you appreciate,</p> <p>11 it's not to alarm you, I am just very anxious that</p> <p>12 everything is shared with you and that you are not kept</p> <p>13 in the dark, and I thought it would be easier for you</p> <p>14 just to think through if you were told in the jury room,</p> <p>15 so that was the reason for all of that.</p> <p>16 Anyway, there we are. I understand we're all okay</p> <p>17 to carry on, so that's what we're going to do.</p> <p>18 Yes.</p> <p>19 MR HOUGH: Today's first witness is Dr Ashley Fegan-Earl.</p> <p>20 Perhaps he could be brought forward to the witness box.</p> <p>21 MR JUSTICE HILLIARD: Yes.</p> <p>22 DR ASHLEY FEGAN-EARL (sworn)</p> <p>23 Questions by MR HOUGH</p> <p>24 MR JUSTICE HILLIARD: Good morning, doctor.</p> <p>25 A. Morning, sir.</p> <p style="text-align: center;">Page 1</p>	<p>1 disasters and incidents such as these.</p> <p>2 Q. Were you instructed to carry out a post-mortem</p> <p>3 examination on the body of Sudesh Amman?</p> <p>4 A. Yes, I was.</p> <p>5 Q. Did you do so on 4 February 2020, two days after his</p> <p>6 death?</p> <p>7 A. Yes, that's right.</p> <p>8 Q. In advance of that examination, did you receive</p> <p>9 a briefing document which told you some basic facts of</p> <p>10 the case, including that a number of shots had been</p> <p>11 fired at Sudesh Amman?</p> <p>12 A. Yes. So, preliminary information to provide a guide,</p> <p>13 but we keep an open mind to our findings at all times.</p> <p>14 Q. You were also later provided with witness statements</p> <p>15 from the key police witnesses and with CCTV footage of</p> <p>16 the incident?</p> <p>17 A. Yes, I was.</p> <p>18 Q. May we begin with your external examination and with the</p> <p>19 firearms injuries which you identified. For your</p> <p>20 reference, this is page 8 and following of your</p> <p>21 post-mortem report.</p> <p>22 A. Yes, thank you.</p> <p>23 Q. Now I'm going to ask you one by one to identify the</p> <p>24 firearms-related injuries which you identified. Is it</p> <p>25 right that the order that we will go in does not imply</p> <p style="text-align: center;">Page 3</p>
<p>1 MR JUSTICE HILLIARD: Yes.</p> <p>2 MR HOUGH: Could you please give your full name?</p> <p>3 A. Dr Ashley William Fegan-Earl.</p> <p>4 Q. Mr Fegan-Earl, you understand I am asking you questions</p> <p>5 first on behalf of the coroner?</p> <p>6 A. Yes, thank you.</p> <p>7 Q. Will you first give your profession?</p> <p>8 A. I'm a Home Office pathologist and consultant forensic</p> <p>9 pathologist.</p> <p>10 Q. What are your relevant qualifications and experience for</p> <p>11 our purposes?</p> <p>12 A. I hold the degrees of Bachelor of Science, Bachelor of</p> <p>13 Medicine and Bachelor of Surgery, the Diploma in Medical</p> <p>14 Jurisprudence. I'm a Fellow of the Royal College of</p> <p>15 Pathologists, a Fellow of the Faculty of Forensic and</p> <p>16 Legal Medicine of the Royal College of Physicians. I'm</p> <p>17 a medical examiner of the Royal College of Pathologists.</p> <p>18 I've worked in forensic pathology since 1997 and been on</p> <p>19 the Home Office approved list of forensic pathologists</p> <p>20 since 2002.</p> <p>21 During the course of that time, I assist the police</p> <p>22 and other agencies in the investigation of sudden</p> <p>23 unexpected unnatural and suspicious deaths, on average</p> <p>24 80 cases per year for the police and an equal number for</p> <p>25 the defence. But equally I give evidence in mass</p> <p style="text-align: center;">Page 2</p>	<p>1 the order in which they were inflicted?</p> <p>2 A. Yes. Injuries are always numbered. That represents the</p> <p>3 order in which we identify and describe the injuries.</p> <p>4 It is not meant to signify that injury 1 came before</p> <p>5 injury 2, came before injury 3. Rarely can</p> <p>6 a pathologist do that, and we can't in this case.</p> <p>7 Q. In some instances you will refer to an injury as being</p> <p>8 an entry wound or an exit wound. Without going into too</p> <p>9 much scientific detail, by what means do you discern</p> <p>10 that something is an entry wound as opposed to an exit</p> <p>11 wound and vice versa?</p> <p>12 A. This sort of examination is a joint examination between</p> <p>13 myself and a ballistics expert, and we consider the</p> <p>14 nature, the shape of the wounds. There are essentially</p> <p>15 differences between an entrance and an exit wound. It</p> <p>16 may be quite difficult to discern that, but by looking</p> <p>17 at the wounds on the skin and later on the damage caused</p> <p>18 by the track of the bullets, we can identify entrance,</p> <p>19 exits and ultimately the entire track of the bullet and,</p> <p>20 if necessary, if present, we can recover bullets for</p> <p>21 further examination.</p> <p>22 Q. In the descriptions you are going to give, are the</p> <p>23 conclusions as to entrance and exit wounds conclusions</p> <p>24 on which you and the ballistics expert agree?</p> <p>25 A. Yes. We considered them together and we both agreed</p> <p style="text-align: center;">Page 4</p>

1 **with the ultimate findings.**
 2 Q. Could you then tell us about the first firearm-related
 3 injury, which I think was to the area of the left wrist?
 4 A. Yes. This was to the left wrist on the little finger
 5 side of the wrist at the junction of the hand and wrist
 6 and forearm. I found a – what I've termed a guttered
 7 firearm-related injury. That means there was a channel
 8 of damaged tissue passing through skin, fat, and down to
 9 the bone of the forearm, 3.2 centimetres in maximum
 10 dimension.
 11 And its appearance was that of a tangential passage
 12 of a bullet, and what I mean by that is a bullet had
 13 passed across the skin, perpendicular, at right angles,
 14 the arm itself, so in a direction such as this
 15 (Indicates). So coming this way and across the wrist.
 16 That injury would bleed to a minor degree, would
 17 not be a fatal injury.
 18 Q. Could you now tell us about the second gunshot-related
 19 injury, which I think was to the right side of the
 20 abdomen?
 21 A. Yes. On the right side of the abdomen was a gunshot
 22 wound. Its features were those of a gunshot entrance
 23 wound, so an entrance wound to the right side of the
 24 abdomen.
 25 With further examination I was able to determine the

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1 track, and it passed through the skin, fat and muscle of
 2 the abdominal wall, then through the mesenteries of the
 3 small bowel. A mesentery is a sheet of fatty tissue
 4 that provides blood supply to the gut itself, so it's
 5 a structure of the gut. It's richly supplied the blood
 6 vessels. And finally into the sacrum, which is a large
 7 bone forming the back part of our pelvis.
 8 From that area I was able to recover a deformed
 9 bullet, in part deformed because when a bullet hits bone
 10 it's often damaged, and that was submitted for further
 11 examination.
 12 So that wound track itself passed from above,
 13 downwards, from deceased's right to left -- and we
 14 always refer to the deceased's perspective when we come
 15 to right and left -- and from front to back of the body.
 16 The effects of that gunshot would have been bleeding
 17 into the abdominal cavity from the blood vessels in
 18 those fatty layers, the mesenteries, and in my view this
 19 was a potentially independent fatal injury.
 20 Q. Would the bleeding into the abdominal cavity have been
 21 substantial and early?
 22 A. Yes, it would have started immediately and it would
 23 largely be internal and retained within the abdominal
 24 cavity.
 25 Q. So would you then tell us about the third numbered

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1 gunshot wound you identified, which I think was in the
 2 area of the lower right neck?
 3 A. Yes. In the lower right neck, the gunshot wound, this
 4 also showed features of an entrance wound. Track was
 5 defined. It passed through the skin, fat and the large
 6 muscles at the root of the neck you can feel when you
 7 turn your head from side to side.
 8 It then passed through large blood vessels which lay
 9 at the base of the neck that go on to supply the arm.
 10 It passed fully through the upper and lower lobes of
 11 the right lung. There are three lobes to the lung, the
 12 right lung, upper, middle and lower; in this case
 13 through the upper and lower.
 14 It then penetrated at the back of the body through
 15 the 8th rib on the right-hand side, before exiting on
 16 the back of the body at a further gunshot exit wound.
 17 So in this case we have a bullet that has travelled
 18 fully through the body, it's passed from above,
 19 downwards, and from front to back, and from the
 20 deceased's left to right. The consequence would have
 21 been collapse of and bleeding from the lung, bleeding
 22 into the chest cavity as a consequence of damage to the
 23 blood vessels at the base of the neck. This was
 24 undoubtedly an independently fatal injury, and I would
 25 expect more bleeding from that particular injury

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1 compared to the previous injury.
 2 Q. Were you able to identify the bullet which had inflicted
 3 this injury?
 4 A. Yes. Upon opening the body bag, it became clear that
 5 there was a bullet laying behind the body close to the
 6 exit wound, and this was the only track that could have
 7 produced this bullet, so yes, that was then recovered
 8 for further investigation.
 9 Q. Next, wound number 4. Is it right that this was a wound
 10 to the right middle back area, which was the exit wound
 11 for the bullet which you just described entering at
 12 wound 3?
 13 A. Absolutely. So we see those two injuries, 3 and 4, as
 14 a pair, representing the entrance and the exit wound.
 15 Q. Then would you please describe the fifth numbered
 16 firearm injury, which I think was in the area of the
 17 right elbow?
 18 A. Yes. On the inner part of the right arm, and just back
 19 from the elbow, a gunshot wound, quite similar in
 20 appearance to that on the left wrist, so a guttered
 21 wound forming a trough at right angles to the arm. It
 22 penetrated through the skin and fat and just into the
 23 triceps muscle, the large muscle on the back of the
 24 upper arm. So that, too, was a tangential passage of
 25 a bullet, so a bullet passing across the back of the

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<p>1 right upper arm. That wound would bleed. It would not 2 have proven fatal. 3 Q. Were those the sum total of the firearm-related injuries 4 which you identified? 5 A. Yes. 6 Q. May we then deal a little more briefly with other 7 external injuries which you identified. 8 Did you also note some signs of what you would 9 describe as sharp force trauma to the right hand? 10 A. I did. Sharp force trauma describes injuries caused by 11 an implement with a sharp cutting edge, the most typical 12 and common example being that of a knife. 13 These injuries were on the palm of the right hand, 14 and they formed a line of injuries over the right 15 little, ring, middle and index finger. So while they 16 were separate spaced by the fingers they essentially 17 formed a line and therefore were consistent with one 18 movement of the hand across a sharp edge. 19 And on the same index finger on the right, a little 20 higher, a small, further cut. 21 So essentially a cut passing across the four fingers 22 of the hand, with one additional cut just a little 23 further towards the fingertip. 24 Q. I'll ask you when we get to your conclusions about how 25 those were likely to be sustained.</p> <p style="text-align: center;">Page 9</p>	<p>1 A. There was a very low level of alcohol within the urine, 2 that was recorded at less than 10 milligrams per 100 3 millilitres. For reference, the legal limit for driving 4 is 80 milligrams per 100 millilitres. The likelihood, 5 in my opinion, is that this low level is due to the 6 action of microbes after death. It's not an uncommon 7 finding, and it's a very, very low level, and equally 8 there was no alcohol in the blood at all. 9 So he was not intoxicated through either drugs or 10 alcohol at the time of this incident. 11 Q. And probably hadn't even taken any form of alcohol? 12 A. In my opinion, no. 13 Q. So we turn then to your conclusions, your page 15. 14 Is it right, looking at your conclusions 3 to 7, 15 that there were four firearms-related injuries? 16 A. There were. 17 Q. So the first which was caused by the bullet entering the 18 neck, passing downwards and backwards through the right 19 lung and exiting the back? 20 A. Yes. 21 Q. The bullet for that recovered in the body bag? 22 A. Yes, behind the body in close proximity to the exit 23 wound. 24 Q. Secondly, an injury caused by a bullet entering the 25 right abdomen, travelling downwards, before lodging in</p> <p style="text-align: center;">Page 11</p>
<p>1 A. Yes. 2 Q. Did you also, when conducting your external examination, 3 find abrasion-type injuries in the areas of both knees? 4 A. Yes, grazes to the front of both of the knees. 5 Q. Did you carry out a full internal examination of the 6 body and the organs in order to establish whether there 7 were any abnormalities or injuries relevant to your 8 examination? 9 A. Yes, I did. 10 We've already discussed the internal track of the 11 injuries to the neck and to the abdomen. Other than 12 that, there were no further injuries of any type, so no 13 further penetrating stab wounds, no blunt impacts, no 14 head injury. And equally there was no evidence of any 15 natural disease that could either cause or contribute to 16 the death. 17 Q. Going then to toxicology, your page 13. 18 Is it right that a number of samples were taken for 19 toxicological examination? 20 A. That's correct. 21 Q. Did these show any evidence of drug use by Sudesh Amman? 22 A. No. There was no evidence of drugs in either blood or 23 urine, and that includes an absence of steroid-type 24 drugs. 25 Q. Was there any sign of alcohol from toxicology?</p> <p style="text-align: center;">Page 10</p>	<p>1 the bone in the pelvic area -- 2 A. Yes, the sacrum, the bone at the back of the pelvis. 3 Q. Then two tangential bullet tracks, one across the right 4 upper arm, and one across the side of the left wrist? 5 A. That's correct, yes. 6 Q. So you've told us each of the neck and abdomen injuries 7 could on its own have proved independently fatal? 8 A. Yes. 9 Q. But not the other two? 10 A. Correct. 11 Q. Looking at your conclusion, point 9, were you able to 12 form any assessment of how many bullets struck 13 Sudesh Amman? 14 A. It could be either three or it could be four. If four 15 bullets: one to the neck, which exited; one to the 16 abdomen; one to the back of the right upper arm; and one 17 across the left wrist. 18 We have to be mindful that the human body is capable 19 of a great many changes in position. I of course am 20 examining a body lying flat on a mortuary table. We 21 have to be mindful of that potential movement. 22 Bearing that in mind, it's entirely conceivable that 23 the injury to the little finger side, the left wrist, 24 a bullet could have passed across the wrist and then 25 entered into the abdomen. So that may represent</p> <p style="text-align: center;">Page 12</p>

1 a single passage of a bullet giving rise to two separate
 2 injuries to the left wrist and right side of the
 3 abdomen, if you allow for the movement of the hand
 4 across the body.
 5 Q. Either struck by three bullets or four?
 6 A. Correct.
 7 Q. Your point 10, did you find any evidence to indicate
 8 very close contact between the firearm and the body at
 9 the time of discharge of any firearm?
 10 A. We are thinking here about whether the weapon was
 11 directly applied to the individual's body or was within
 12 just a very few inches, because that may produce
 13 a different appearance to the injuries. Equally, it may
 14 result in debris from the weapon being lodged in the
 15 skin. There was no evidence of that, so no contact or
 16 close contact of those -- of those weapons. Plainly
 17 there will be other evidence, including CCTV, that will
 18 assist in determination of range of fire.
 19 Q. Your point 11, did you find it possible from the
 20 examination alone to define the relative positions of
 21 the person firing as against Sudesh Amman?
 22 A. No. This again comes down to the inevitably dynamic,
 23 fast-moving and fluid situation that is present. It
 24 would be naive for a pathologist to be able to look at
 25 a series of injuries and define exactly where the firer

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1 was relative to the individual, simply because there are
 2 so many different permutations that can be achieved
 3 between both -- both by the firer and by the deceased
 4 themselves.
 5 I noted that both of the injuries passed backwards
 6 and downwards, although there was some change in whether
 7 one -- one passed slightly to the left, one passed
 8 slightly to the right.
 9 The best that we can reasonably do is if we're given
 10 a scenario we can comment whether that is plausible from
 11 a pathological perspective, and I would add again there
 12 may be ample additional evidence that may assist in that
 13 deliberation.
 14 Q. May I just show you a few captures from the CCTV, which
 15 I know you have seen?
 16 A. Yes.
 17 Q. INQ003452. First of all, page 17.
 18 If it's possible, may we maximise the area showing
 19 the two officers and Sudesh Amman.
 20 Now, this shows the two officers who fired on
 21 Sudesh Amman at the moment that he was turning to them
 22 and they were about to fire.
 23 A. Yes.
 24 Q. The officer on the pavement we're calling BX75 --
 25 A. Yes.

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1 Q. -- he fired two shots at this time?
 2 A. Yes.
 3 Q. And the officer in the roadway we're calling BX87, and
 4 he fired three shots at this time. Now, I can show you
 5 a series of further image captures, but the broad
 6 location of the officers as against Sudesh Amman is
 7 reasonably constant over the fractions of a second that
 8 follow.
 9 Are you able to attribute any of the gunshot
 10 injuries to shots fired by either particular officer
 11 with any degree of confidence at all?
 12 A. No. I don't think that that's a reasonable
 13 consideration that can be made by the pathologist. All
 14 we can do is comment on the wounds present and the
 15 tracks, and to comment on the fact that they're going
 16 downwards. I couldn't say which firer was responsible
 17 for which injury. It's simply not possible.
 18 Q. Thank you very much. We can take that image off screen
 19 now.
 20 Looking at your point 12, to what extent, if at all,
 21 could Sudesh Amman have managed purposeful movement
 22 following the ballistic injuries that you have
 23 described, assuming that they all took place within
 24 a short space of time?
 25 A. Well, individuals are frequently capable of some level

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1 of activity, having sustained what ultimately turn out
 2 to be fatal injuries.
 3 They may have significant adrenaline drive due to
 4 the emotional impact of the incident. That serves to
 5 keep blood pressure up. And this was a young, fit man,
 6 so some level of purposeful activity may be possible.
 7 There's huge variation between responses of individuals.
 8 Clearly CCTV demonstrates the rapidity with which he
 9 collapsed, but of course collapse does not mean death at
 10 that point.
 11 Q. Would each of the two major injuries you've described
 12 have bled reasonably substantially and briskly?
 13 A. Yes, they would, and in particular the injury to the
 14 neck, given the damage caused both to the lung and to
 15 the large blood vessels at the root of the neck.
 16 Q. Beyond the ballistic injuries, were there any other
 17 injuries indicative of police contact in any way?
 18 A. No. And there I'm thinking about handcuff marks,
 19 strikes with a baton, taser barb marks or any changes in
 20 the face that might be caused by the use of
 21 an incapacitant spray.
 22 Equally, no signs of any third-party assault or
 23 compression of the neck.
 24 Q. You have described sharp force injuries to the right
 25 hand, that line of cuts --

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1 **A. Yes.**
 2 Q. -- that you described across the palm where it meets the
 3 base of each finger.
 4 Are you able to describe how those were sustained or
 5 might have been sustained?
 6 **A. I can't say how they were definitely sustained.**
 7 **However, I can give a potential explanation. So far as**
 8 **I'm aware, there is no individual who engaged the**
 9 **deceased with a knife. And I say that on the basis that**
 10 **if an individual is approached by someone with a knife,**
 11 **the natural reaction is to outstretch the hands and the**
 12 **arms to protect the body or equally to try and disarm**
 13 **the individual, and in that setting you may see cuts to**
 14 **the palm of the hand.**
 15 As far as I'm aware, no one at any time approached
 16 him with a knife.
 17 Equally, I am mindful that he had already stabbed
 18 two other individuals. I'm not precisely aware of their
 19 injuries, but it is certainly the case in other cases of
 20 murder by knife that if a knife penetrates the body and
 21 it encounters a firm resistant structure, it may
 22 decelerate the knife. The hand may continue onward and
 23 therefore go down the blade. I'm thinking here of
 24 impact against bone such as ribs or substantial muscle
 25 blocks, so which stop the blade, hand goes along the

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1 handle and onto the knife, and that equally may produce
 2 an interrupted row of injuries representing that pass.
 3 The other feature I've considered is how he removed
 4 the knife from its packaging, and whether he may have
 5 accidentally caused injuries in that way.
 6 Q. In any event, did these wounds to the hand have any
 7 contribution at all to this?
 8 **A. No, none at all. They may have bled to a degree, but**
 9 **they made no contribution whatsoever.**
 10 Q. You've told us in relation to toxicology that there was
 11 no positive evidence of alcohol or drug use?
 12 **A. That's right.**
 13 Q. Could you tell us the cause of death you arrived at,
 14 using the standard notation which pathologists use?
 15 **A. Yes, the formal cause of death is given in two parts,**
 16 **this is standard notation: Ia and Ib. The way to look**
 17 **at that is Ia is due to Ib. Ia is shock and**
 18 **haemorrhage, and that's due to Ib, gunshot wounds to the**
 19 **neck and the abdomen.**
 20 It's always worth pointing out that the term "shock"
 21 here is used in medical terminology, not lay
 22 terminology, and that refers to the deprivation of the
 23 vital organs of blood and oxygen. Why is that? That's
 24 due to the haemorrhage, the bleeding, and that bleeding
 25 arising from the gunshot wounds to the neck and to the

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1 **abdomen.**
 2 Q. Thank you.
 3 I'm now going to ask you a few questions about
 4 whether there were circumstances in which Sudesh Amman
 5 could feasibly have been saved after these injuries were
 6 inflicted.
 7 We know that he sustained his injuries just before
 8 1.59 pm.
 9 **A. Yes.**
 10 Q. We know that he made some spasm-like movements for
 11 a short time and was motionless within the
 12 first minutes. I think you've seen the CCTV --
 13 **A. I have indeed, yes, thank you.**
 14 Q. We know that he was assessed by paramedics at 3.20 pm
 15 and certified dead at 3.24 pm.
 16 **A. Yes.**
 17 Q. And we know that in the intervening time the reason he
 18 was not approached was because he was wearing what
 19 appeared to be an explosive device?
 20 **A. Yes, quite.**
 21 Q. Now, it's not for you to decide, or comment upon whether
 22 he could have been assessed by paramedics earlier. It
 23 may be that he couldn't have been. So set that to one
 24 side.
 25 Given the two significant bullet wound injuries,

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1 could he realistically have been saved, as a matter of
 2 realistic possibility, if he had received earlier
 3 attention from either police medics or paramedics at the
 4 scene?
 5 **A. I answer that question based on my knowledge of**
 6 **treatment of victims of various violence, either**
 7 **stabblings or shootings, and the treatment that can be**
 8 **given, and whether they survive or not.**
 9 In terms of police medics and paramedics, while
 10 basic life support may be carried out, there would be
 11 nothing that they could reasonably do to stem the
 12 bleeding to the blood vessels damaged in the root of the
 13 neck, those that have passed through the right lung or
 14 those that were in the mesentery.
 15 So from that perspective there is nothing that they
 16 could reasonably have done.
 17 For example, they cannot be readily compressed to
 18 control that bleeding in the way that, for example,
 19 an injury to the leg might be compressed by direct
 20 external pressure.
 21 In terms of more advanced medical and surgical
 22 treatment, London is fortunate to have the helicopter
 23 emergency medical service, who can carry out much more
 24 advanced and interventional treatment, including, for
 25 example, opening the chest to directly access bleeding

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<p>1 structures and to try and control that bleeding.</p> <p>2 The key issue here is time. Time is the enemy of</p> <p>3 survival in these issues, simply being that blood will</p> <p>4 continue to be lost, blood pressure will drop</p> <p>5 dramatically, and when it drops to a critical degree</p> <p>6 that individual will enter into cardiac arrest.</p> <p>7 How quickly that would occur is very difficult to</p> <p>8 determine with certainty. But I would reiterate, damage</p> <p>9 to three critical structures: mesentery, right lung and</p> <p>10 vessels at the root of the neck. So unless such</p> <p>11 individuals could be able to access him within just</p> <p>12 a few minutes, I do not believe there's a reasonable</p> <p>13 opportunity to have saved him.</p> <p>14 Q. Based on your own experience and your knowledge of the</p> <p>15 speed with which a HEMS team can arrive, even if he</p> <p>16 hadn't been wearing an apparent explosive belt, would</p> <p>17 there have been a realistic chance to administer that</p> <p>18 sort of care within that sort of time?</p> <p>19 A. Based upon the pathological demonstration of injuries</p> <p>20 and their effects, I do not believe so.</p> <p>21 Q. So, very shortly, in practical terms, the injuries he</p> <p>22 sustained were not survivable, irrespective of whether</p> <p>23 he could have been approached and treated sooner?</p> <p>24 A. That's my view.</p> <p>25 MR HOUGH: Thank you very much, those are all my questions.</p> <p style="text-align: center;">Page 21</p>	<p>1 A. Yes.</p> <p>2 Q. You appreciate also that you're giving evidence about</p> <p>3 events on Streatham High Road which you witnessed on</p> <p>4 2 February last year, a Sunday?</p> <p>5 A. Yes.</p> <p>6 Q. You made a witness statement and you may refer to that</p> <p>7 as you wish.</p> <p>8 A. (Nodded assent)</p> <p>9 Q. On that Sunday, shortly before 2 o'clock in the</p> <p>10 afternoon, where were you?</p> <p>11 A. I was on the High Road doing some shopping.</p> <p>12 Q. Was your husband Detroy with you?</p> <p>13 A. He was with me, yes.</p> <p>14 Q. In the course of that, did you go into a hardware store</p> <p>15 called the Low Price Store?</p> <p>16 A. I did, yes.</p> <p>17 Q. May we look at an image of that. We'll see this come up</p> <p>18 on screen, INQ002682, page 53.</p> <p>19 Just wait, it will come up on screen in a moment.</p> <p>20 Maximise, please, the top-right image.</p> <p>21 Is that the store we're talking about?</p> <p>22 A. Yes, that's the store that I went into.</p> <p>23 Q. Did you go in with your husband?</p> <p>24 A. Yes, I went in with my husband.</p> <p>25 Q. At the time that you entered, were you aware of anybody</p> <p style="text-align: center;">Page 23</p>
<p>1 I will see if others have questions.</p> <p>2 First of all, Mr Menon for the family of</p> <p>3 Sudesh Amman.</p> <p>4 MR MENON: Thank you, I have no questions for Dr Fegan-Earl.</p> <p>5 MR HOUGH: I see that no other advocate has any questions.</p> <p>6 Dr Fegan-Earl, thank you very much for your very clear</p> <p>7 evidence.</p> <p>8 THE WITNESS: Thank you sir.</p> <p>9 MR JUSTICE HILLIARD: Thank you, doctor.</p> <p>10 (The witness withdrew)</p> <p>11 MR HOUGH: The next witness is Barbara Wallace.</p> <p>12 MS BARBARA WALLACE (sworn)</p> <p>13 Questions by MR HOUGH</p> <p>14 MR HOUGH: As Ms Wallace is sitting down, perhaps the</p> <p>15 microphone could be directed closer to her.</p> <p>16 (Pause)</p> <p>17 Now, if you can try to keep your voice up,</p> <p>18 Ms Wallace, just because the jury need to hear you and</p> <p>19 also we're broadcasting to other courts.</p> <p>20 A. Okay.</p> <p>21 Q. First of all, could you please tell us your full name</p> <p>22 for the court record?</p> <p>23 A. It's Barbara Wallace.</p> <p>24 Q. Ms Wallace, you know I'm asking you questions first on</p> <p>25 behalf of the coroner?</p> <p style="text-align: center;">Page 22</p>	<p>1 in there, including staff members?</p> <p>2 A. Sorry could you repeat?</p> <p>3 Q. Were you aware of anybody in there when you entered?</p> <p>4 I'm including staff members in that question.</p> <p>5 A. Yes.</p> <p>6 Q. How many people?</p> <p>7 A. I think there were two people in there, shop owners, and</p> <p>8 I think there was another shopper in there as well while</p> <p>9 I was in there.</p> <p>10 Q. Is it right that there was somebody working on the till,</p> <p>11 the shop owner, you think?</p> <p>12 A. Yes, there was somebody on the till and there was</p> <p>13 another person in there --</p> <p>14 Q. Where was the other person who you think worked in the</p> <p>15 store?</p> <p>16 A. I think he was just in the aisle. I think he may have</p> <p>17 been preparing lunch or was about to have lunch, but he</p> <p>18 was in there as well.</p> <p>19 Q. When you first entered the store, which part of it did</p> <p>20 you go to?</p> <p>21 A. When I first entered the store, I just went to the</p> <p>22 beginning bit. So when you go in, you can see different</p> <p>23 containers and different things. So I just started to</p> <p>24 look at the front of it, first, of the store, and then</p> <p>25 I went round to the back and came back.</p> <p style="text-align: center;">Page 24</p>

<p>1 Q. If we look at the next page, page 54, we'll see a plan 2 of the store. In your statement you refer to going to 3 the aisle on the right. So it's a narrow store with 4 some shelving in the middle towards the rear. We can 5 see two aisles, one on the right and one on the left, 6 and you refer in your statement to going up the 7 right-hand one; is that correct? 8 A. Yes, that's correct. 9 Q. You also refer to your husband having gone up the left 10 hand aisle to look at the items there. 11 A. Yes. 12 Q. While you were there, did you become aware of anyone 13 else being in or coming into the store? 14 A. Yes, there were -- I think there was a lady that was at 15 the front of the store. And there was another gentleman 16 that was in the store while me and my husband was 17 debating on plastic containers to buy. 18 Q. Now, is that the gentleman you later discovered was 19 Sudesh Amman? 20 A. Yes, it was. 21 Q. Where were you in the store when you became aware of him 22 for the first time? 23 A. I was to the right, and my husband was to the left, and 24 he was in the middle in between us. 25 Q. If we go back to the previous page, page 53. Could we</p> <p style="text-align: center;">Page 25</p>	<p>1 Q. In your statement you say that, looking back, his 2 posture was strange for someone just shopping, almost 3 like he was carrying himself with his shoulders out 4 appearing top-heavy; is that right? 5 A. That's correct, yes. 6 Q. You also said his face showed no emotion but his eyes 7 were very wide, as you recalled? 8 A. That's correct, yes. 9 Q. You'd been speaking across him to your husband on the 10 other side. Did you make any movements while he was in 11 the store? 12 A. I did. Because we wanted to get a container to put fish 13 in, so at one point I had to pass him to go over to 14 where my husband was just to choose the container. 15 Q. So you moved from the right-hand aisle -- 16 A. I did. 17 Q. -- to the left-hand aisle and that involved going past 18 him? 19 A. Yes, and he moved out the way. 20 Q. Did you have any exchange with him or anything like that 21 as you -- 22 A. No, nothing at all. 23 Q. Did you then go down the left-hand aisle to be with your 24 husband, helping to select an item? 25 A. Yes, I did.</p> <p style="text-align: center;">Page 27</p>
<p>1 please maximise the bottom right image. 2 Now, this is a view a shopper would have if they 3 were at the till looking down the right-hand aisle where 4 you were. 5 A. Yes, that's where -- yes, that's correct. 6 Q. Where was Sudesh Amman when you first saw him? 7 A. He was probably -- so I was on the right, my husband was 8 on the left, and he was just at the front there just in 9 between where the aisle is, where all the products are. 10 That's where he was standing. 11 Q. Thank you. So he was roughly where the pathway into the 12 store divides into the two aisles? 13 A. Yes, that's correct. 14 Q. Did you notice anything about his appearance when you 15 first saw him? 16 A. Not really, just that he was standing there. 17 Q. As the moments went on, did you notice anything unusual 18 about him or what he was doing? 19 A. Nothing really unusual, but that he was just standing 20 there for quite a while in between -- so I had to talk 21 my husband while he was still there. He had a bag on 22 his back. And he just seemed to be standing there for 23 a long time, whereas normally shoppers would probably be 24 browsing, but he was there, so I had to speak above him 25 while speaking to my husband while he was still there.</p> <p style="text-align: center;">Page 26</p>	<p>1 Q. While you were doing that, did anything happen to draw 2 your attention? 3 A. Yes, I just heard the shop owners shouting something and 4 we were just both wondering what -- what happened. 5 Q. Did you look round? 6 A. I didn't really look around. I just went to the shop 7 owner to ask him what just happened. 8 Q. Did you see what just happened or did you have to ask 9 about it? 10 A. I didn't see, but I heard it because I heard him shout, 11 so I just went -- 12 Q. Heard who shout? The shop owner or -- 13 A. Yes, he yelled something. 14 Q. Do you remember what it was he yelled? 15 A. I can't remember, but I think it could've been "Hey" or 16 he did some -- he said something like -- he did say 17 something, I think it was "Hey", at the time. 18 Q. Did the shop owner do anything either at the time that 19 he shouted or immediately afterwards? 20 A. I'm sure he ran out the shop. 21 Q. What was your impression as to what was going on? 22 A. I just thought that someone just came into the shop and 23 stole something. 24 Q. What did you then do? 25 A. I went outside actually, on the High Road, to see what</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 else was going on. And then I just saw a lady, I think</p> <p>2 she was on a cycle, a bicycle, who was crouching down.</p> <p>3 Q. Where was she? We can see on the plan the Low Price</p> <p>4 Store is marked with a number 2.</p> <p>5 A. Mm-hm.</p> <p>6 Q. We can see the pavement going north and south. To the</p> <p>7 north it would have been to your left, to the south it</p> <p>8 would have been to your right. Where was she when you</p> <p>9 saw her, this lady?</p> <p>10 A. I can't remember rightly because I remember walking --</p> <p>11 walking towards -- like going towards Boots. Because</p> <p>12 the other end is going to where the Lidl shop is, so</p> <p>13 I was walking towards Boots and I remember seeing</p> <p>14 a lady -- I'm sure it was a lady on a bicycle and she</p> <p>15 was crouching down.</p> <p>16 Q. You turned out of the store, you think to the right, and</p> <p>17 you saw a lady who was crouching down?</p> <p>18 A. Yeah, looked like she was injured.</p> <p>19 Q. Was there anyone around her?</p> <p>20 A. There was someone around her, yes.</p> <p>21 Q. Did you move towards her?</p> <p>22 A. I did try to move towards her, but then I heard some</p> <p>23 other commotion around me so I moved back.</p> <p>24 Q. You say you heard some other commotion. Can you</p> <p>25 describe the noise or noises you heard?</p> <p style="text-align: center;">Page 29</p>	<p>1 commotion, telling us to stay back and go back.</p> <p>2 Q. You told us that the shop owner from the Low Price Store</p> <p>3 ran out of the shop initially?</p> <p>4 A. Yes.</p> <p>5 Q. Did you see him again over this period?</p> <p>6 A. I did, yes.</p> <p>7 Q. What did he do or say?</p> <p>8 A. He said that the gentleman had stolen a knife from the</p> <p>9 front of the store and that he stabbed someone.</p> <p>10 Q. In your statement you recall the store owner also having</p> <p>11 some sort of packaging in his hand; is that right?</p> <p>12 A. Yes, I think it was -- I don't know if it was the empty</p> <p>13 packaging or whether he was able to get the knife back,</p> <p>14 I wasn't sure, but he had a package. It looked like</p> <p>15 that's where the knife came from.</p> <p>16 Q. Did you remain on the street or in the area for a short</p> <p>17 time before you were warned away by some armed police</p> <p>18 officers?</p> <p>19 A. Yes, I did stay in the area for a short time. I was</p> <p>20 outside, I was outside the shop, and I was speaking to</p> <p>21 other people that were on the High Road at the time</p> <p>22 wondering what's going on or what's happening.</p> <p>23 Q. Did you hear anything from the police officers who</p> <p>24 warned you away as to why they were clearing the scene?</p> <p>25 A. I think one of the police officers, he was -- I'm sure</p> <p style="text-align: center;">Page 31</p>
<p>1 A. It sounded like fireworks at the time that I heard, but</p> <p>2 I think it was gunshots.</p> <p>3 Q. How many gunshots in that first instant?</p> <p>4 A. Maybe two or three.</p> <p>5 Q. What did you immediately think was going on?</p> <p>6 A. I don't know. I just thought it was maybe some gang</p> <p>7 violence that was going on, some altercation on the High</p> <p>8 Road. That's what I thought.</p> <p>9 Q. A moment or two after that, were you aware of any people</p> <p>10 moving around you?</p> <p>11 A. Yes, there was lots of people moving around because</p> <p>12 there was the lady that was on her bicycle and there was</p> <p>13 some -- there was something else going on at Boots.</p> <p>14 Someone went -- I heard someone say to go to a towel or</p> <p>15 a cloth to cover someone, so I knew that something was</p> <p>16 happening towards the Boots end, but I didn't venture</p> <p>17 too far towards that end. I just stayed by the</p> <p>18 haberdashery side.</p> <p>19 Q. You describe in your statement after a short time seeing</p> <p>20 people running past?</p> <p>21 A. Yes.</p> <p>22 Q. What sort of people did you think those were?</p> <p>23 A. Just normal shoppers, just running see what was</p> <p>24 happening. And I think during that time could've been</p> <p>25 police came on the scene as well, during all that</p> <p style="text-align: center;">Page 30</p>	<p>1 he said, "Get back, get back, move from that area" --</p> <p>2 erm ... yeah, I just remember him shouting. He</p> <p>3 was very, very stressed at the time. He was saying that</p> <p>4 we need to clear the area now, and that Lidl needs to --</p> <p>5 that all the shops need to be cleared and need to --</p> <p>6 everything needs to be cleared because the gentleman --</p> <p>7 it was a serious incident, so he -- yeah, I remember him</p> <p>8 saying that we all need to leave that area now.</p> <p>9 Q. In your statement you say that you also heard from at</p> <p>10 least one of the officers that there was a device?</p> <p>11 A. Yes, yes, he did say that. He did say that the --</p> <p>12 there could be a device so we have to go back, we have</p> <p>13 to leave, yes.</p> <p>14 MR HOUGH: Thank you very much. Those are all the questions</p> <p>15 I have for you. I'll see if anyone else has any</p> <p>16 questions, beginning with Mr Menon who is joining</p> <p>17 remotely.</p> <p>18 MR MENON: No questions, thank you.</p> <p>19 MR HOUGH: I see no other advocate has any questions.</p> <p>20 Ms Wallace, thank you very much for coming to give</p> <p>21 evidence.</p> <p>22 THE WITNESS: Thank you.</p> <p>23 (The witness withdrew)</p> <p>24 MR HOUGH: So the next witness is Timothy Hudson, who</p> <p>25 Mr Moss will be questioning.</p> <p style="text-align: center;">Page 32</p>

<p>1 MR TIMOTHY HUDSON (affirmed)</p> <p>2 Questions by MR MOSS</p> <p>3 MR MOSS: Mr Hudson, you can sit or stand. Either way,</p> <p>4 could you speak into the microphone that is there.</p> <p>5 Could you please confirm your full name for the court</p> <p>6 record?</p> <p>7 A. Timothy Leander Hudson.</p> <p>8 Q. You understand I am asking questions first on behalf of</p> <p>9 the coroner and other questions may be asked on behalf</p> <p>10 of other people afterwards?</p> <p>11 A. Yes.</p> <p>12 Q. Is it right that on 2 February, a Sunday last year, you</p> <p>13 had been shopping on Streatham High Road?</p> <p>14 A. Yes.</p> <p>15 Q. And you were with your granddaughter, we don't need to</p> <p>16 know her name, but that's right, isn't it?</p> <p>17 A. Correct.</p> <p>18 Q. Had you been to CEX, the computer exchange shop?</p> <p>19 A. Yes, we had.</p> <p>20 Q. Then you walked back to your car and was that parked on</p> <p>21 Pendennis Road?</p> <p>22 A. Correct.</p> <p>23 Q. Were you driving?</p> <p>24 A. I was.</p> <p>25 Q. We're going to see an image on screen, INQ2682/29, which</p> <p style="text-align: center;">Page 33</p>	<p>1 Q. How was the traffic?</p> <p>2 A. It was flowing slowly, just steadily.</p> <p>3 Q. Do you remember what vehicle or vehicles were in front</p> <p>4 of your vehicle?</p> <p>5 A. There was a black car which -- I'm not sure where it</p> <p>6 turned -- but there was a black car initially and there</p> <p>7 was a bus in front.</p> <p>8 Q. The bus was -- so the car directly in front of you, the</p> <p>9 black car, and then directly in front of that, a bus?</p> <p>10 A. Correct.</p> <p>11 Q. Is that a double-decker bus?</p> <p>12 A. It was, yes.</p> <p>13 Q. Were there many people on the pavement?</p> <p>14 A. Yes, it was quite busy.</p> <p>15 Q. Were you moving slowly enough that you were able to be</p> <p>16 aware of what was going on on the pavement?</p> <p>17 A. Yes.</p> <p>18 Q. You were travelling south down the map. Did there come</p> <p>19 a time when you were approximately opposite the Boots</p> <p>20 store that we can see labelled on the map?</p> <p>21 A. Yes.</p> <p>22 Q. You were the driver, you were on the right-hand side of</p> <p>23 the map as we're looking at it, travelling down, so you</p> <p>24 were on the Boots side of the car, if we can call it</p> <p>25 that?</p> <p style="text-align: center;">Page 35</p>
<p>1 is a map that will help us work out where you were.</p> <p>2 I hope you can take it from me that the road that in</p> <p>3 fact isn't marked but is opposite Becmead Avenue, the</p> <p>4 top right-hand corner of this map, that's Pendennis</p> <p>5 Road.</p> <p>6 A. Okay.</p> <p>7 Q. If you see, there's a large, empty area just north of</p> <p>8 that junction, that's the Odeon Cinema, but again it's</p> <p>9 not marked.</p> <p>10 A. Okay.</p> <p>11 Q. Does that help you to get your bearings?</p> <p>12 A. Yes.</p> <p>13 Q. So you were in Pendennis Road, and is this right, you</p> <p>14 turned your car around and you drove back down towards</p> <p>15 the High Road?</p> <p>16 A. Correct.</p> <p>17 Q. Which way did you turn when you met the High Road?</p> <p>18 A. So we would have turned left, heading towards the</p> <p>19 Norbury direction.</p> <p>20 Q. So you are travelling down the map, you're travelling</p> <p>21 south?</p> <p>22 A. Correct.</p> <p>23 Q. All of this was shortly before 2.00 in the afternoon,</p> <p>24 wasn't it?</p> <p>25 A. Correct.</p> <p style="text-align: center;">Page 34</p>	<p>1 A. Boots was on my right-hand side.</p> <p>2 Q. Yes. And you were on the right-hand side of the car,</p> <p>3 I think, weren't you?</p> <p>4 A. Yes.</p> <p>5 Q. Did you have your window up or down?</p> <p>6 A. The windows were -- my window was down, I believe. My</p> <p>7 granddaughter's window was up.</p> <p>8 Q. Did you have music on in the car?</p> <p>9 A. We did, yes.</p> <p>10 Q. Do you remember if it was loud music?</p> <p>11 A. Not -- no, not too loud.</p> <p>12 Q. Could you hear what was going on outside?</p> <p>13 A. Well, we were listening to the music and then we heard</p> <p>14 shouting outside, so I then lowered it -- this --</p> <p>15 because I heard shouting.</p> <p>16 Q. Could you see where the shouting was coming from?</p> <p>17 A. Initially, no, but eventually, yes.</p> <p>18 Q. When you did see it, what did you see?</p> <p>19 A. We saw a gentleman running up towards us, but on the</p> <p>20 opposite side of the road, with something in his hand</p> <p>21 and he was being chased by what I now know to be police</p> <p>22 officers.</p> <p>23 Q. When you heard the shouting, was the black car still</p> <p>24 between you and the bus or were you --</p> <p>25 A. No.</p> <p style="text-align: center;">Page 36</p>

<p>1 Q. -- behind the bus?</p> <p>2 A. It was no longer there.</p> <p>3 Q. You were directly behind the bus?</p> <p>4 A. Correct.</p> <p>5 Q. When you heard the shouting?</p> <p>6 A. Correct.</p> <p>7 Q. So would it be right that with a double-decker bus in</p> <p>8 front of you, and there's a single lane of traffic in</p> <p>9 each direction --</p> <p>10 A. Yes.</p> <p>11 Q. -- that bus is obscuring your view down the pavement</p> <p>12 a little bit?</p> <p>13 A. Correct.</p> <p>14 Q. So you couldn't see all the way ahead of you?</p> <p>15 A. Initially no, no, I couldn't.</p> <p>16 Q. Can you tell us what the shouting or screaming sounded</p> <p>17 like?</p> <p>18 A. It sounded like a -- an altercation. Arguments and</p> <p>19 shouting, someone shouting out to another person.</p> <p>20 Eventually -- yes, we just heard -- I just heard the</p> <p>21 shouting and I then saw figures come into view and the</p> <p>22 shouting was continuing.</p> <p>23 Q. Figures coming into view?</p> <p>24 A. Yes.</p> <p>25 Q. How many?</p> <p style="text-align: center;">Page 37</p>	<p>1 waving around.</p> <p>2 Q. What did the gentleman have in his hands?</p> <p>3 A. I thought that it was a machete and I also thought that</p> <p>4 it was gang-related, because it was a machete, waving it</p> <p>5 around, and then they shouted to put it down several</p> <p>6 times and he still had it in his hand.</p> <p>7 Q. Did you see who was shouting, whether it was one of them</p> <p>8 or more of them, to put it down?</p> <p>9 A. Maybe one or two of them. There was a chap with a hat</p> <p>10 on with black and white markings around it.</p> <p>11 Q. Did that make it clear to you he was a police officer?</p> <p>12 A. Yes, it did.</p> <p>13 Q. Was there more than one person wearing that chequered</p> <p>14 hat or was it just one person --</p> <p>15 A. I can remember only one wearing it.</p> <p>16 Q. But there were -- there were at least two people there,</p> <p>17 were there, one in the chequered hat and one other</p> <p>18 person?</p> <p>19 A. Yes. I think two would have shouted -- two may have</p> <p>20 shouted. Because it was quite a commotion, so two would</p> <p>21 have shouted.</p> <p>22 Q. They shouted, "Put it down"?</p> <p>23 A. Yes.</p> <p>24 Q. One or both of them.</p> <p>25 Did the man holding the machete put it down?</p> <p style="text-align: center;">Page 39</p>
<p>1 A. So there was a young gentleman, and there was another</p> <p>2 three -- three gentlemen running after him.</p> <p>3 Q. How quickly were they running?</p> <p>4 A. At a good pace.</p> <p>5 Q. How near to the front person who was running were the</p> <p>6 three people who were running after him?</p> <p>7 A. They were closing in on him. I mean, it wasn't a vast</p> <p>8 distance. I don't know, potentially -- I don't know,</p> <p>9 5 metres, within 5 metres?</p> <p>10 Q. If we could please zoom in on the map to the area where</p> <p>11 the shops are, so Boots and Holland & Barrett, and</p> <p>12 I know you're a little bit of a distance from the screen</p> <p>13 but hopefully you can see that.</p> <p>14 A. Yes.</p> <p>15 Q. Is your car pretty much opposite Boots; is that right?</p> <p>16 A. It is, a silver A-Class Mercedes.</p> <p>17 Q. Where were the four people running when you saw them?</p> <p>18 Can you say outside which shop they were running?</p> <p>19 A. They were outside Boots, first of all.</p> <p>20 Q. So you didn't see them until they were outside Boots?</p> <p>21 A. I saw them probably just before Boots, actually, but</p> <p>22 they stopped -- not probably, definitely I saw them</p> <p>23 before Boots, but they stopped at Boots.</p> <p>24 Q. Were you clear about why they stopped? Did you see?</p> <p>25 A. Maybe because of what the gentleman had in his hand</p> <p style="text-align: center;">Page 38</p>	<p>1 A. No.</p> <p>2 Q. What did he do?</p> <p>3 A. Just waving it around in the air.</p> <p>4 Q. Was it up above his head, was it at shoulder height, was</p> <p>5 it out in front of him?</p> <p>6 A. Above his head.</p> <p>7 Q. Was he facing towards them, was he facing away from</p> <p>8 them, the police officers?</p> <p>9 A. Towards them.</p> <p>10 Q. When he was waving it above his head and when he was</p> <p>11 facing towards them, are you able to help us with what</p> <p>12 sort of distance was between him and them?</p> <p>13 A. Maybe -- so where Boots was, they were standing off the</p> <p>14 kerb, so in the road.</p> <p>15 Q. The police officers were --</p> <p>16 A. Yeah.</p> <p>17 Q. -- or the man with the machete?</p> <p>18 A. They were, from him. So there was quite a few metres</p> <p>19 away. At that stage they were pointing guns at him, but</p> <p>20 they had stepped back from him. When they saw him and</p> <p>21 they were close to him and then he stood up like that,</p> <p>22 they kind of stepped back and they held out their guns</p> <p>23 at that stage.</p> <p>24 Q. You're treating the two police officers as a pair. You</p> <p>25 are describing them as doing the same things. I can</p> <p style="text-align: center;">Page 40</p>

<p>1 understand why, it all happened very quickly, but did 2 they just -- 3 A. The one with the checked hat, I recall him stepping 4 back. 5 Q. Was he the one nearer you or further away from you or 6 could you not remember that? 7 A. He was the one nearest to us, because we were opposite, 8 so he was the nearest one to us, I would say. 9 Q. So was he further into the road than the other one? 10 Would that be fair to say? 11 A. Yes. 12 Q. So he stepped back? 13 A. Correct. 14 Q. Are you able to say what the other one, the one nearer 15 Boots, was doing? 16 A. I think they just all circled the gentleman at the time. 17 I can't remember exactly where he was, but he was in 18 close proximity, I'd say, that's similar to the other 19 one. 20 Q. Just jumping back very slightly in the narrative, you 21 said you saw guns, they were both pointing their guns? 22 A. Mm. 23 Q. When did you first see that these two officers had guns? 24 A. When the chap had the -- whatever it was, machete or 25 knife, in the air, I then saw when they got near him</p> <p style="text-align: center;">Page 41</p>	<p>1 guns in the same manner. 2 Q. You said that before they raised their guns, they, one 3 or both of them, said, "Put it down"? 4 A. Yes. 5 Q. Did you hear the officers say any other words after 6 that? 7 A. No, just, "Put it down", and they may have said it 8 several times, from my recollection. 9 Q. So we've got to the point in the narrative where the man 10 with the machete is holding it up above his head, he's 11 facing towards the officers, they've stepped back and 12 they've, one or both of them, raised their guns and one 13 or both of them are aiming at the man with the machete? 14 A. Yes. 15 Q. What happens next? 16 A. There were two shots fired. 17 Q. Are you able to say whether it was one or both of them 18 that fired those shots? 19 A. I can't. 20 Q. Are you able to say how the shots were spaced out? Did 21 they all happen in a cluster or do you not know? 22 A. It sounded in close proximity. 23 Q. What happened after the shots were fired? 24 A. The chap fell to the ground and he moved slightly and 25 then he -- he was still.</p> <p style="text-align: center;">Page 43</p>
<p>1 they stood back and then they held their gun out. 2 That's when we recognised it was -- it was -- a gun. 3 Q. Had you seen them holding their guns or aiming their 4 guns before the point at which they stepped back? 5 A. I hadn't notice it then, no, I hadn't. 6 Q. When you did first see their guns, let's deal with the 7 officers separately, so first the one in the checked hat 8 who was nearer you. 9 A. Yes. 10 Q. How was he holding the gun? 11 A. He was holding it facing the actual -- the gentleman 12 with the machete. 13 Q. Was it aimed at that person -- 14 A. It was aimed at him, yes. 15 Q. Was he holding it with one or both hands, could you see? 16 A. If I was to make a choice in the sense of recollecting, 17 it would be two hands. 18 Q. But you don't remember clearly? 19 A. No, I wouldn't say clearly. 20 Q. But he had the gun extended out in front of him? 21 A. Correct. 22 Q. And then the other officer on the pavement, so he's the 23 one without the checked hat, could you see his gun? 24 A. I believe he had a gun as well, yes, and they were both 25 probably held -- when I say both, the officers held the</p> <p style="text-align: center;">Page 42</p>	<p>1 Q. How did the police officers react after that? 2 A. Someone came -- ran over -- because the traffic had 3 stopped, the bus had stopped, so we couldn't drive 4 anywhere. Someone must have ran over, I'm not sure if 5 it was from the guys who had fired the shots, but 6 someone came and said the traffic to move, move along. 7 The bus started to drive and we started to drive as 8 well. 9 Q. Shortly before that, is it right that you'd seen a black 10 unmarked police car? 11 A. Yes. A black police car came, I'm not sure from what 12 direction, it could've been down coming up, I think, and 13 it stopped near us or something. Or from behind us. 14 I can't remember now. It's -- 15 Q. If I told you that the jury had seen video footage of 16 the black car weaving from the traffic coming between 17 the bus and other traffic and coming towards you, that 18 would be right? 19 A. Correct, yes. 20 Q. Then when the bus moved off, you moved off with it? 21 A. Correct. 22 MR MOSS: Mr Hudson, thank you. I have no further questions 23 for you. There may be questions from others, first 24 Mr Menon, who will appear on one of the screens, 25 I think.</p> <p style="text-align: center;">Page 44</p>

<p>1 MR MENON: No questions, thank you.</p> <p>2 MR MOSS: And no questions from anybody else. Mr Hudson,</p> <p>3 thank you very much for your evidence.</p> <p>4 MR JUSTICE HILLIARD: Thank you very much.</p> <p>5 (The witness withdrew)</p> <p>6 MR HOUGH: Sir, the next witness is Slawomir Kudla, and</p> <p>7 there is an interpreter.</p> <p>8 SLAWOMIR KUDLA (sworn)</p> <p>9 (All answers interpreted, unless otherwise indicated)</p> <p>10 THE INTERPRETER: Abarina Kruba (?), interpreter, language,</p> <p>11 Polish. Thank you.</p> <p>12 Questions by MR HOUGH</p> <p>13 MR HOUGH: Please give your full name.</p> <p>14 A. (Not interpreted): Slawomir Kudla.</p> <p>15 Q. Mr Kudla, do you understand that you're giving evidence</p> <p>16 about events you witnessed on Sunday 2 February 2020?</p> <p>17 A. (Interpreted): Yes, I do.</p> <p>18 Q. At around 2.00 in the afternoon of that day, were you at</p> <p>19 home?</p> <p>20 A. Yes.</p> <p>21 Q. Was your home on Streatham High Road, opposite Holland &</p> <p>22 Barrett and Boots?</p> <p>23 A. Yes.</p> <p>24 Q. Was your home on an upper floor of the building with</p> <p>25 windows out onto the street?</p> <p style="text-align: center;">Page 45</p>	<p>1 hands, that I was feeding the fish at that time, I had</p> <p>2 the food, and I went back to the window. And I said to</p> <p>3 my wife, who was in the kitchen, "Something's going on</p> <p>4 outside."</p> <p>5 Q. You turned away from the window to speak to your wife</p> <p>6 briefly?</p> <p>7 A. No, she was in -- in a different room. I just said it</p> <p>8 out loud so she could hear me. But I turned away from</p> <p>9 the window.</p> <p>10 Q. So you turned away from the window for a moment.</p> <p>11 Did you then turn back?</p> <p>12 A. When I hear -- heard the noise outside again.</p> <p>13 Q. When you turned back, what could you then see?</p> <p>14 A. I could see a man stood outside Boots and -- and a few</p> <p>15 man near him, next to him, as -- surrounding him</p> <p>16 (overspeaking), and a car parked across the road.</p> <p>17 Q. Now, the first man, the man who was surrounded, do you</p> <p>18 remember anything about his appearance or his clothing?</p> <p>19 A. I think he was wearing a dark military jacket and light</p> <p>20 trousers. Dark shoes.</p> <p>21 Q. When you say a military patterned jacket, do you mean</p> <p>22 a camouflage-type jacket?</p> <p>23 A. Yes.</p> <p>24 Q. Now, you say that there were other men surrounding him;</p> <p>25 how many?</p> <p style="text-align: center;">Page 47</p>
<p>1 A. Yes.</p> <p>2 Q. Which room were you in and what were you doing when your</p> <p>3 attention was drawn?</p> <p>4 A. I was in my daughter's room, which is a small bedroom,</p> <p>5 and I was feeding her fish.</p> <p>6 Q. Did something happen to draw your attention to events in</p> <p>7 the street outside?</p> <p>8 A. I heard some screaming outside and I looked out of the</p> <p>9 window.</p> <p>10 Q. When you looked out of the window, what did you see?</p> <p>11 A. I saw some people who suddenly stopped and then they</p> <p>12 started to run -- to run backwards, to run away.</p> <p>13 Q. Did you hear any sounds in the moments that followed?</p> <p>14 A. Yes.</p> <p>15 Q. What did you hear?</p> <p>16 A. I heard some noise outside of my window. It seemed to</p> <p>17 me like two gunshots, but I'm not entirely sure.</p> <p>18 Q. Could you tell what direction they came from?</p> <p>19 A. Yes.</p> <p>20 Q. Was it from the left, so towards the south, or from the</p> <p>21 right, towards the north?</p> <p>22 A. From the left.</p> <p>23 Q. What do you then do?</p> <p>24 A. I looked out of the window for -- for a bit and the</p> <p>25 street is empty. So I put down whatever I had in my</p> <p style="text-align: center;">Page 46</p>	<p>1 A. I noticed three.</p> <p>2 Q. May we please put on screen a sketch which you drew.</p> <p>3 INQ001831. That's the sketch which you drew for the</p> <p>4 police?</p> <p>5 A. Yes.</p> <p>6 Q. Is it right that you've marked the first man with the</p> <p>7 camouflage jacket with a "1"?</p> <p>8 A. Yes.</p> <p>9 Q. You've then marked 2, 3 and 4. What do those refer to?</p> <p>10 A. So the -- so these men who were stood with their backs</p> <p>11 to me and surrounding him.</p> <p>12 Q. Could you hear anybody saying anything?</p> <p>13 A. They were saying something, but there was noise out in</p> <p>14 the street and the windows to the room were closed.</p> <p>15 Q. Even if you couldn't hear the exact words, do you</p> <p>16 remember anything about what anyone was saying?</p> <p>17 A. They were uttering some loud commands.</p> <p>18 Q. Is that the men marked 2, 3 and 4 that you're referring</p> <p>19 to now?</p> <p>20 A. Yes.</p> <p>21 Q. They were uttering commands. Could you tell whether</p> <p>22 they were uttering those commands at anyone in</p> <p>23 particular?</p> <p>24 A. They were stood facing that man, so they were uttering</p> <p>25 them towards that man.</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 Q. The man in the camouflage jacket, how did he respond to 2 the commands, if at all? 3 A. I couldn't hear him saying anything, but he was behaving 4 nervously, turning round in every direction. 5 Q. What did he then do? 6 A. There was also this ... because for a moment I took my 7 eyes off him to look at what was going on closer to me 8 in the street. I wasn't looking, observing, what he was 9 doing at all times. I was also looking out at the car. 10 Q. Did you look back at him? 11 A. Yes. 12 Q. What was he doing when you looked back at him? 13 A. When I looked at him, after those nervous movements 14 turning right and left, and these men were saying 15 commands to him, I noticed that he was holding something 16 in his hand, like a knife. 17 Q. Did you notice anything about the people who had 18 surrounded him and had shouted the commands? 19 A. I don't understand you. What is it about? 20 Q. The men who were surrounding him, who had shouted the 21 commands, were they carrying anything? 22 A. I could see their backs. Couldn't have seen what they 23 could have up front. 24 Q. Could you tell anything about their posture, their 25 position?</p> <p style="text-align: center;">Page 49</p>	<p>1 moved towards the officers. 2 Q. What sort of movement did he make? 3 A. A sudden one, as if he was getting ready to attack. 4 Q. In your statement you describe it as a lunging movement; 5 is that right? 6 A. Yes. 7 Q. What did you then see or hear? 8 A. I heard gunshots. 9 Q. How many gunshots did you hear at that moment? 10 A. At that one I think there were three. 11 Q. All together or spaced apart at all? 12 A. In very short period, very close. 13 Q. What happened to the man in the camouflage jacket? 14 A. He did a half step forward, then he kneeled down, then 15 he fell down to the pavement. And then he stretched out 16 his hand, then I saw him as if move a few times and then 17 stopped. 18 Q. What did the other men, the men you've marked 2, 3 and 19 4, then do? 20 A. They moved closer to that one who was lying on the 21 pavement. 22 Q. What happened next? 23 A. And then I noticed that another person move over on 24 a motorcycle, and I also noticed -- and I -- and then 25 that -- I noticed after they turned around, because they</p> <p style="text-align: center;">Page 51</p>
<p>1 A. I think there were two slimmer ones and one of them was 2 more well-built. 3 MR JUSTICE HILLIARD: Could you see anything in their hands, 4 in any of their hands? 5 A. In the hands of man number 2, because he was stood at 6 an angle, in his I could see a weapon. 7 Number 3 had his back turned to me entirely. 8 I could see him just from behind, from the top. 9 And to the fourth one I wasn't paying attention at 10 that time. 11 MR HOUGH: You said the first man had a weapon. What sort 12 of weapon? 13 A. A pistol. 14 Q. When you were looking at them at this point in time, 15 were they continuing to say anything? 16 A. They were saying something to him all the time. 17 Q. So they were continually saying something to him? 18 A. Yes. 19 Q. And were these all like the short commands you described 20 earlier? 21 A. Yes. 22 Q. How did the man with the knife then react? 23 A. After turning one side and then the other, for a moment 24 he stood up straight, with -- with that knife in his 25 hand. I mean, with that object in his hand. And then</p> <p style="text-align: center;">Page 50</p>	<p>1 turned round my direction when they were talking to each 2 other, I could see that they had police badges. And 3 they were talking to each other, just talk. 4 Q. After a short time, did you become aware of more 5 officers with guns arriving in marked police vehicles? 6 A. Yes. Later on a marked police vehicles arrived and then 7 police officers came out of those, officers in uniforms 8 with machine guns. 9 Q. Did they help clear the area of people? 10 A. One of them with a -- one of the officers, he positioned 11 himself between Argos and -- and he was aiming at the 12 one lying down, and the rest had dispersed and I didn't 13 notice what they were doing. 14 Q. May we put on screen INQ002043. Is this a photograph 15 you took from your window after the man had been shot? 16 A. Yes. 17 Q. Then INQ002044, is this another photograph you took from 18 your window after the marked police car had arrived? 19 A. Yes. 20 MR HOUGH: Thank you very much, those are all the questions 21 I have for you. I'll check if anyone else has any 22 questions. 23 MR MENON: No questions, thank you. 24 MR HOUGH: I see no questions from others. Thank you very 25 much for your evidence.</p> <p style="text-align: center;">Page 52</p>

<p>1 MR JUSTICE HILLIARD: Thank you. 2 (The witness withdrew) 3 MR HOUGH: We have one more bystander witness. I am told 4 that she will be a very brief witness and we should be 5 able to finish her either before or just after 6 1 o'clock. Her name is Omolara Ochei and Mr Moss will 7 be asking her questions. 8 MR JUSTICE HILLIARD: Yes. 9 OMOLARA OCHEI (sworn) 10 Questions by MR MOSS 11 MR MOSS: Can you please state your full name for the court 12 record? 13 A. Omolara Ochei. 14 Q. Ms Ochei, if you'd like to sit or stand, do whatever 15 makes you more comfortable. 16 Is it right that you live on Streatham High Road? 17 A. Yes, I do. 18 Q. We're going to look at an image, INQ2682/29. It will 19 appear in front of you. 20 If we could please zoom in on the area around the 21 shops. 22 Is it right that the window of your flat is opposite 23 those shops, on the other side of the road? 24 A. Yes. 25 Q. And so your window looks out towards Lidl and Argos in</p> <p style="text-align: center;">Page 53</p>	<p>1 Q. Was he on your side of the road or on the other side of 2 the road? 3 A. He was on the other side of the road. 4 Q. Where we see the shops on the map? 5 A. Yes. 6 Q. He was running, is it right, from the bottom of the 7 picture, as we look at it, towards the top of the 8 picture? 9 A. Yes. 10 Q. Can you say what shop he was outside when you first saw 11 him? 12 A. I would probably say he was running from -- I think 13 there's the -- is it the converter, Cash Converter? 14 Q. Yes. 15 A. It was from there. It was either from just -- I would 16 say from there, from Cash Converter. Immediately 17 I look, I would say that was where he was when he -- 18 when I could see somebody running. 19 Q. And you're looking at a window that let's you look 20 down -- 21 A. Yes. 22 Q. -- upon the scene? So there's nothing in your way 23 obstructing what you can see? 24 A. No, not at all. 25 Q. Could you see anybody with him or was he on his own?</p> <p style="text-align: center;">Page 55</p>
<p>1 that direction? 2 A. Yes. 3 Q. Is it noisy living on a main road? 4 A. Yes, it can be, yes. 5 Q. Was there unusual noise on 2 February 2020? 6 A. Yes. 7 Q. What did you hear? 8 A. Yes, there was. It was very loud noise. I was -- I was 9 in the bedroom and I heard this very loud noise. It was 10 different from the usual noise and -- 11 Q. In what way was it different? 12 A. It was sudden and very loud. I thought there was some 13 commotion, but it was enough for me to have ran out of 14 my bedroom into my living room and then looked through 15 the window. 16 Q. Is it normal that noises make you look out of the 17 window? 18 A. No, not like that. It was different, it was unique. 19 Q. What did you see when you looked out of the window? 20 A. The first thing I saw was the suspect running towards 21 Streatham High Road so -- 22 Q. He was on the main road? 23 A. He was on the main road. 24 Q. Was he on the pavement or was he -- 25 A. He was on the pavement.</p> <p style="text-align: center;">Page 54</p>	<p>1 A. No, he was -- initially he was -- well, he was on his 2 own. I just saw him running. 3 Q. When you heard the unusual sound -- 4 A. Yes. 5 Q. -- what was it that made you realise that it was him 6 that was creating or the cause of the unusual sound? 7 A. Well, immediately I looked, I saw this man running, and 8 the way -- he looked suspicious. I thought it was 9 a robbery going on. 10 Q. What was suspicious? 11 A. Just the way he was running. He's -- I don't know, he 12 was running like somebody that was up to no good. 13 Q. How fast was he running? 14 A. He wasn't really -- he wasn't particularly sprinting. 15 He -- I mean, I feel like he wasn't running like his 16 life depend on it. 17 Q. He wasn't running as though his life depended on it? 18 A. No, he wasn't running that fast, but he was running. 19 Q. Could you see if he was holding anything or carrying 20 anything? 21 A. I can't say. 22 Q. And did he carry on running? 23 A. Yes, he continued to run, yes. 24 Q. Did you see him have any interaction with any other 25 person?</p> <p style="text-align: center;">Page 56</p>

<p>1 A. No.</p> <p>2 Q. Were there --</p> <p>3 A. Not initially.</p> <p>4 Q. Were there people running with him?</p> <p>5 A. Not initially. Initially when I looked, I saw just him</p> <p>6 running. Then I saw who I identified to be an officer</p> <p>7 popped out of nowhere, who seemed to have been running</p> <p>8 after him or following -- at least that was what</p> <p>9 I thought. I thought the officer must have been</p> <p>10 following him, just the way I saw him running. When</p> <p>11 I looked behind him I didn't see much. Then I saw</p> <p>12 an officer as if jumped up in front of Lidl.</p> <p>13 Q. So the officer popped out from somewhere behind the</p> <p>14 person who was running?</p> <p>15 A. He had already ran.</p> <p>16 Q. Was the officer ahead of the person who was running?</p> <p>17 A. No, the suspect was running.</p> <p>18 Q. Yes.</p> <p>19 A. The officer followed.</p> <p>20 Q. And --</p> <p>21 A. Not -- I wouldn't say -- I didn't see both of them</p> <p>22 running like that, if that makes sense. I saw him run</p> <p>23 first. Then I looked, then I saw -- it was as if --</p> <p>24 Lidl is -- when you look from my window, Lidl is where</p> <p>25 you could see it straight away, like Lidl is literally</p> <p style="text-align: center;">Page 57</p>	<p>1 maybe "Stop", or something to, I don't know, let people</p> <p>2 know something is going on. Something as -- I don't</p> <p>3 know, I assume he said something like "Stop". I can't</p> <p>4 be certain what was said.</p> <p>5 Q. Did you realise immediately that he was shouting at the</p> <p>6 first man you saw running?</p> <p>7 A. Yes, yes.</p> <p>8 Q. So you saw the first man who was running get towards</p> <p>9 Lidl, you said?</p> <p>10 A. Yes.</p> <p>11 Q. And then does there come a time when the police officer</p> <p>12 gets to Lidl as well?</p> <p>13 A. Yes.</p> <p>14 Q. Where is the first man who was running when the police</p> <p>15 officer gets to Lidl?</p> <p>16 A. He must have been maybe -- he would have -- I think he</p> <p>17 probably would have passed Argos and been, maybe,</p> <p>18 I don't know, between Argos, Peacock.</p> <p>19 Q. Do you remember that when the police officer was outside</p> <p>20 Lidl, the man who was running away from the police</p> <p>21 officer was further up the street?</p> <p>22 A. Yes.</p> <p>23 Q. Maybe by the next shop or even one shop further than</p> <p>24 that?</p> <p>25 A. Yes, yes.</p> <p style="text-align: center;">Page 59</p>
<p>1 opposite.</p> <p>2 Q. So you weren't able to see both of these people at the</p> <p>3 same time. You saw the person running in the front?</p> <p>4 A. I saw -- yes.</p> <p>5 Q. And then after that, separately, you saw a person who</p> <p>6 you thought to be a police officer?</p> <p>7 A. Yes.</p> <p>8 Q. Was that person wearing a hat that marked him out to be</p> <p>9 a police officer?</p> <p>10 A. Yes.</p> <p>11 Q. Did you see what that person, the police officer, did?</p> <p>12 A. He -- he had a gun in his hand.</p> <p>13 Q. Did he have a gun when you first saw him?</p> <p>14 A. Yes, yes.</p> <p>15 Q. Can you describe how he was carrying it? Was it down by</p> <p>16 his side? Was it out in front of him?</p> <p>17 A. No, I felt -- I believe I saw him holding it up</p> <p>18 (Indicates).</p> <p>19 Q. So pointing up in the air?</p> <p>20 A. Yes, and he shouted something.</p> <p>21 Q. So you are describing him holding it in his hands</p> <p>22 roughly at shoulder or head height --</p> <p>23 A. Yes.</p> <p>24 Q. What did he shout?</p> <p>25 A. I can't remember exactly. I felt it was something like</p> <p style="text-align: center;">Page 58</p>	<p>1 Q. What did the police officer do?</p> <p>2 A. Apart from he shot -- I believe he shot up.</p> <p>3 Q. Up in the air?</p> <p>4 A. Yes. Because it was just like "pow", and I was like,</p> <p>5 "Ooh." And then --</p> <p>6 Q. Were you looking at -- I'm sorry go on.</p> <p>7 A. Yes, because I was looking at him, it was a split second</p> <p>8 thing, and then at this stage it felt like he jumped out</p> <p>9 of nowhere, because I saw the suspect pass and then</p> <p>10 I saw the officer put his gun up, shouted something, the</p> <p>11 gun went off, boom or shoot or whatever, I don't know,</p> <p>12 and that was -- and then he ran after the suspect. Then</p> <p>13 both of them were running.</p> <p>14 Q. The police officer who fired the shot up in the air, was</p> <p>15 it just one shot?</p> <p>16 A. Just one shot, yes.</p> <p>17 Q. Did he stop moving whilst he fired the shot or did he do</p> <p>18 it whilst running?</p> <p>19 A. Oh, he stopped. He stopped right there. He was like:</p> <p>20 "boom". He said something, the gun went up, and then he</p> <p>21 started running after the guy.</p> <p>22 Q. Did he catch up with the man he was chasing?</p> <p>23 A. This is what -- there wasn't that much distance.</p> <p>24 I mean ... everything happened so quickly, but I --</p> <p>25 I mean, I feel like there wasn't that much distance and</p> <p style="text-align: center;">Page 60</p>

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<p>1 this is why I said the guy -- it didn't feel like the 2 suspect was running like his life depend on it, like 3 somebody that is being chased with a gun. I don't know 4 if that makes sense. 5 Q. The jury has seen videos that show that the person who 6 was running from the police stopped outside Boots. Were 7 you watching when he stopped outside Boots? 8 A. Yes, because I felt like everything kind of like -- yes, 9 because I can't remember him running past Boots, and 10 I think this is why I felt like he wasn't running too 11 much. I could see from -- I have a sash window and 12 I have a blind. After the initial -- the first gun by 13 the officer, I remember lifting the -- my blinds up and 14 then trying to open the window and then put my head out, 15 and I think I could see him (inaudible) in front of 16 Boots. And by then the officer was -- well, more or 17 less close on him. The distance wasn't that much 18 between both of them. 19 Q. In your witness statement you describe the order of 20 events this way: that outside Boots you heard a second 21 gunshot. 22 A. (Nodded assent) 23 Q. You then put your head out of the window, and after that 24 you heard more gunshots. 25 A. Okay.</p> <p style="text-align: center;">Page 61</p>	<p>1 I then heard a second shot as the undercover officer was 2 running between a street lamp located at the end of 3 'Argos' and a street lamp located at the opposite end of 4 'Peacocks'. 5 A. That's right. 6 Q. "Both the undercover and the suspect had their backs 7 towards me, so I could not at this stage see the 8 shooting, but did clearly hear it." 9 A. Yes, I heard it. 10 Q. That is what happened? 11 A. Yes. 12 Q. So you heard a second gunshot? 13 A. Yes. 14 Q. The suspect had run up the road further and is near 15 Boots at this point? 16 A. Yes. 17 Q. But you couldn't see who fired that gunshot; is that 18 right? 19 A. No, I just assumed it was the officer. 20 Q. And you then looked out of the window, having heard 21 that, you opened the window more and you leant out? 22 A. Yes. 23 Q. When you looked out what could you see? 24 A. At the time the third -- okay, the third shot, gunshot, 25 hadn't gone up then, so I could see the officer kind of</p> <p style="text-align: center;">Page 63</p>
<p>1 Q. This isn't a memory test. Do you think that's right? 2 Because, of course, you wrote your statement on 3 25 August of last year. 4 A. The second -- I feel like the second gun went in -- 5 okay, the second -- after the first gunshot, I -- 6 between the time I decide to look -- put my head through 7 the window, the second gun went off. 8 Q. So let's deal with what happened outside Boots. 9 That's where we know the attacker who is running 10 from the police, that's where he stops. 11 Can I ask how many police officers you were able to 12 see in that area? 13 A. I could only identify the officer that I saw first. 14 Q. So the one officer that you saw fire the shot outside 15 Lidl up in the air, you saw him again outside Boots or 16 did you -- or can you not say that you saw him outside 17 Boots? 18 A. I won't say outside initially, not outside Boots, but in 19 between -- in between Argos, I think there was 20 a distance -- in between Argos and -- and Holland & 21 Barrett, he was there. 22 Q. You say in your witness statement: 23 "After the first shot, the undercover officer began 24 to run after the suspect. The suspect continued running 25 in the same direction that he had been running in.</p> <p style="text-align: center;">Page 62</p>	<p>1 like hiding between the walls, you know, as if trying to 2 -- huddling behind the walls. 3 Q. So was the officer standing against the shops? 4 A. Yes. 5 Q. On the shop side of the pavement? 6 A. Yes. 7 Q. And was the officer standing on your side of Boots or on 8 the other side of Boots? 9 A. No, on the other side, everything happened on the other 10 side. 11 Q. But you're looking down the street -- 12 A. Oh, you mean -- 13 Q. -- was the officer -- 14 A. -- yeah, on the other side, there was Boots. 15 Q. Was the officer between you and Boots or was the officer 16 further away? Is it right that the officer was standing 17 between Holland & Barrett and Boots? 18 A. Yes. 19 Q. And you're looking at the officer there and you hear 20 a third shot. Are you able to say who fired that shot? 21 A. No, because then I had -- I had put my head in, back 22 into my flat, to pick my glasses, and look -- it was in 23 between the time I tried to grab my glasses and looked 24 back out that a third gun went off. 25 Q. When you looked back out what could you see?</p> <p style="text-align: center;">Page 64</p>

<p>1 A. The suspect now on the floor, and I'm thinking he had 2 just gone down, he must have maybe rolled a bit, I can't 3 be certain, and then -- 4 Q. So you could see him moving slightly, could you? 5 A. Yes, and then he just stopped, it was very quick. 6 Q. When he stopped moving did anyone go over and do 7 anything to him? 8 A. I think the officer who I have just seen moved 9 cautiously closer, and I think he used his feet to push 10 something away. 11 Q. We've seen a video that one of the officers kicked the 12 knife out of the hand of the person lying on the floor; 13 is that what you saw? 14 A. Yes, I couldn't say that it's out of the hand but I 15 did -- I could say he did kick something cautiously 16 away, yes. 17 Q. And what happened after that? Did the police officer 18 stay near to the person on the floor or did they move 19 away? 20 A. No, he moved away. I think after that they -- then he 21 moved away. And I think there was another guy that 22 arrived at the same -- who was tall, bald-headed, he 23 arrived in a motorcycle, he removed his helmet and he 24 was kind of like dealing with the officer or something 25 like that, or trying to get people to move away or</p> <p style="text-align: center;">Page 65</p>	<p>1 QUESTIONS BY MR HOUGH 2 MR HOUGH: Could you please give your full name and your 3 rank in the Metropolitan Police Service? 4 A. I'm Ross McKibbin, I'm a superintendent in the 5 Metropolitan Police. 6 Q. Superintendent McKibbin, you understand I'm asking you 7 questions first on behalf of the coroner? 8 A. Yes. 9 Q. What is your current role within the Metropolitan 10 Police? 11 A. I am the head of Counter Terrorism and Specialist 12 Operations within SCO19, which is the Metropolitan 13 Police's specialist firearms. 14 Q. When did you first enter police service? 15 A. I first joined the Metropolitan Police in 1995. 16 Q. At what time did you join SCO19, the firearms command? 17 A. I joined SCO19 in 2012, first of all as an inspector, 18 where I became a TFC, a tactical firearms commander, and 19 then a cadre tactical firearms commander, a bit 20 different to being -- one is to command spontaneous 21 firearms incidents, the second is pre-planned or 22 authorised firearms incidents. 23 I then did various roles within 19. I became the 24 practitioner lead for tactical firearms command within 25 the Met, took over as the chief inspector in charge of</p> <p style="text-align: center;">Page 67</p>
<p>1 something like that. 2 MR JUSTICE HILLIARD: We have all this on film really, 3 haven't we. 4 MR MOSS: How long did you watch for? 5 A. I can't really tell because I think after then I quickly 6 grabbed my phone and then started recording. 7 MR MOSS: I'm grateful. I have no further questions. It 8 may be that others have questions for you. First, 9 Mr Menon on the screen. 10 A. Thank you. 11 MR MENON: No. No, thank you, no questions. 12 MR MOSS: And no other questions from the room. Thank you 13 very much for your evidence. 14 MR JUSTICE HILLIARD: Thank you very much. 15 (The witness withdrew) 16 MR HOUGH: Sir, would that be a convenient time for our 17 lunch break? We have one witness this afternoon and one 18 statement to be read. It will be a short day but we do 19 have to go into the afternoon. 20 MR JUSTICE HILLIARD: All right. So, members of the jury, 21 we'll break off there then until 2.00. 22 (1.10 pm) 23 (The short adjournment) 24 (2.00 pm) 25 ROSS MCKIBBIN (affirmed)</p> <p style="text-align: center;">Page 66</p>	<p>1 command, and then in charge of ARV operations. 2 Q. I think you qualified as a strategic firearms commander, 3 is that right? 4 A. Yes, I left 19 and came back as a superintendent, 5 qualified as a strategic firearms commander and then 6 a specialist firearms commander, having been trained in 7 extreme threat and kidnap operations. 8 Q. Can you confirm that you are here to give evidence 9 primarily concerning the training in firearms matters 10 given to firearms command officers and to surveillance 11 officers in the context of this case? 12 A. Yes, sir. 13 Q. May I first ask you some general questions about 14 firearms training in the UK, which you addressed from 15 page 5 of your witness statement, if it helps. 16 Is it right that the College of Policing, a national 17 body, licences police forces across the country to 18 provide firearms training? 19 A. Yes, that's correct, sir. There are two key documents 20 that drive the firearms training in the UK. One is 21 authorised professional practice, which is published by 22 the College of Policing. The second -- and that's 23 a public document, you can look up that on the internet, 24 anyone can see that. The second document is the 25 National Police Firearms Training Curriculum, which is</p> <p style="text-align: center;">Page 68</p>

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<p>1 not a public-facing document for obvious reasons,</p> <p>2 because it gives away trade craft. It describes exactly</p> <p>3 the process that armed officers will go through in</p> <p>4 mitigating threat.</p> <p>5 The College of Policing pull together various</p> <p>6 modules of firearms training into what is called role</p> <p>7 profiles, and those role profiles designate what the</p> <p>8 armed officers can and can't do. There are 10 basic</p> <p>9 core role profiles, baseline role profiles, they're</p> <p>10 called, and there are 32 in total at the current time.</p> <p>11 Q. So is it right that for each relevant role, for example,</p> <p>12 an armed response officer, there will be a national role</p> <p>13 profile which will contain the modules that represent</p> <p>14 the minimum training content for an officer in that</p> <p>15 role?</p> <p>16 A. That's correct, sir, yes. And the Metropolitan Police</p> <p>17 can add to that, indeed any police force can add to the</p> <p>18 basic requirement of the role profile, based on what's</p> <p>19 called an armed policing strategic risk assessment,</p> <p>20 which every police force has to go through each year</p> <p>21 with a midterm review, and based on that review they can</p> <p>22 add to that minimum role profile with additional modules</p> <p>23 that they deem fit for the environment that they face.</p> <p>24 In the Metropolitan Police for surveillance officers,</p> <p>25 for example, we've added things like dealing with</p> <p style="text-align: center;">Page 69</p>	<p>1 Q. Of course. Perhaps the microphone can just be levelled</p> <p>2 towards you. You've done that yourself, thank you very</p> <p>3 much.</p> <p>4 Just briefly then, some questions about the firearms</p> <p>5 command roles.</p> <p>6 Now, we've heard from officers who filled the role</p> <p>7 of strategic firearms commander, tactical firearms</p> <p>8 commander and operational firearms commander in the</p> <p>9 context of this case, so I'm going to ask you about,</p> <p>10 broadly speaking, what training those officers had.</p> <p>11 Likewise, we've heard from the firearms tactical adviser</p> <p>12 in this case and I'll ask you some questions about that</p> <p>13 role.</p> <p>14 A. Mm.</p> <p>15 Q. First of all, strategic firearms commander. In</p> <p>16 a sentence or two what is the function of such a command</p> <p>17 officer?</p> <p>18 A. It is the strategic firearms commander is in overall</p> <p>19 command of the firearms operation and they take ultimate</p> <p>20 responsibility. They are responsible for setting the</p> <p>21 strategy, ensuring there are sufficient resources in</p> <p>22 place, and for agreeing the working strategy that the</p> <p>23 TFC will work to and putting in place any tactical</p> <p>24 parameters that they might require of the TFC.</p> <p>25 Q. We've heard that in the context of this case the</p> <p style="text-align: center;">Page 71</p>
<p>1 subjects on buses and trains and tubes, for example.</p> <p>2 Q. Thank you.</p> <p>3 Now, who decides in any given force, and in</p> <p>4 particular the Metropolitan Police, how training hours</p> <p>5 are to be built up to ensure that each officer entering</p> <p>6 a role profile is properly trained?</p> <p>7 A. The chief firearms instructor decides that.</p> <p>8 Q. Is it possible for any given officer to check by easy</p> <p>9 reference to a record that that officer was up to date</p> <p>10 with their training by a particular point in time?</p> <p>11 A. Yes, sir. So we have a system called the Firearms</p> <p>12 Management System, and any training officer with access</p> <p>13 to that system can check exactly whether an officer is</p> <p>14 in date for every module of their compulsory requirement</p> <p>15 throughout the year and indeed at any point within the</p> <p>16 year.</p> <p>17 Q. Have you yourself checked or caused to be checked that</p> <p>18 the firearms officers involved in this case were up to</p> <p>19 date with their training? By that I include the armed</p> <p>20 surveillance officers, the armed response officers who</p> <p>21 attended the scene and the firearms command officers?</p> <p>22 A. I have sir, yes.</p> <p>23 Q. Were they all up to date?</p> <p>24 A. They were all in date, sir.</p> <p>25 Do you mind if I sit down?</p> <p style="text-align: center;">Page 70</p>	<p>1 strategic firearms commander formally authorised the</p> <p>2 arming of the surveillance officers and renewed that</p> <p>3 authorisation each day?</p> <p>4 A. Absolutely. So the operation cannot go out until the</p> <p>5 strategic firearms commander on an authorised operation</p> <p>6 has authorised it. That is a key function of the role.</p> <p>7 Q. Will a strategic firearms commander, as in this case, be</p> <p>8 a relatively senior officer normally?</p> <p>9 A. So the minimum rank of a strategic firearms commander is</p> <p>10 a superintendent. Nationally, we find that strategic</p> <p>11 firearms commanders can be chief officers, but in the</p> <p>12 Met due, to the -- the high number of operations that we</p> <p>13 are required to run, we have a dedicated strategic</p> <p>14 firearms commander role, which is at superintendent</p> <p>15 rank.</p> <p>16 Q. Is it right that for the strategic firearms commander,</p> <p>17 as for the tactical firearms commander, the person need</p> <p>18 not have themselves worked as a firearms officer in</p> <p>19 junior ranks?</p> <p>20 A. That's correct. The role of strategic and tactical</p> <p>21 firearms commanders are bespoke. They're not dependent</p> <p>22 on any having any experience of firing a weapon. The</p> <p>23 training that those officers undertake, which I can go</p> <p>24 to in a minute, refers to decision-making rather than</p> <p>25 the use of a firearm.</p> <p style="text-align: center;">Page 72</p>

<p>1 Q. Very briefly can you tell us the duration and the broad 2 subject matter of the course for a strategic firearms 3 commander? 4 A. So the strategic firearms commander's course is a week 5 long. It covers a raft of decision-making topics, 6 focused primarily around the National Decision Model, 7 which I think you've heard about. The -- the strategic 8 firearms commander students are taken through a variety 9 of different scenarios where their understanding of that 10 decision-making process is tested, and then at the end 11 of that course they are assessed with multiple incidents 12 which they are required to take command of, authorise 13 the deployment of various officers, and make various 14 decisions commensurate with their role. 15 That's a pass-or-fail course. 16 Q. Next, tactical firearms commander. We've heard from the 17 tactical firearms commander in this case, designated as 18 DS51. What, in a sentence or two, is the role of the 19 tactical firearms commander? 20 A. So once the operation is authorised by the SFC and the 21 SFC has decided what the -- the working strategy will 22 be, the TFC's role is to decide what tactics will be 23 used in order to achieve that working strategy. They do 24 that by following the National Decision Model. They 25 gather all the available intelligence, they work through</p> <p style="text-align: center;">Page 73</p>	<p>1 do an SFCDP course, which is the Specialist Firearms 2 Commander Development Programme, which is another week's 3 course, which enables them to manage high-threat 4 firearms operations then or extreme-threat CT and kidnap 5 operations. I think both of these officers have done 6 that course, or certainly have now. 7 That is a very difficult course, also pass or fail, 8 and both officers are assessed together as a TFC/SFC 9 working together. 10 Q. As with the strategic firearms commander, you've told us 11 that the tactical firearms commander need not have 12 worked with firearms in their earlier police career? 13 A. Correct. 14 Q. Is it right that a tactical firearms commander, once 15 qualified, must complete a certain number of operational 16 deployments regularly, and undergo annual refresher 17 training? 18 A. Yes, that's right. So there's a difference between 19 occupational competence and operational competence. 20 Occupational competence means they've passed the course. 21 Operation competence means, having passed the course, 22 they then deliver the job being assessed by a mentor, 23 and they have to do a minimum number of operational 24 deployments and take command of them and be assessed by 25 an experienced SFC or TFC, at which point they are</p> <p style="text-align: center;">Page 75</p>
<p>1 a threat assessment, the working strategy, they seek 2 advice from the tactical adviser, and then they make 3 a decision on what tactics they are going to use which 4 are presented to the SFC for final authorisation for the 5 operation. 6 That course is split into two parts, as I indicated 7 earlier. The first course is the ITFC course, the 8 Initial Tactical Firearms Commanders course, which 9 enables the TFC to command spontaneous firearms 10 incidents, so no-notice incidents. There might be 999 11 calls from the public or it might be a no-notice call 12 from a Metropolitan Police officer who wishes to do 13 something based on intelligence that wasn't previously 14 available. That course is eight days long, at the end 15 of which there are a number of assessments that that TFC 16 has to pass. 17 That officer can then go on to become a cadre 18 tactical firearms commander, which enables them to plan 19 authorised operations, that is with intelligence that we 20 know about in advance. It's much more complicated. 21 It's normally covert in nature. The nature of the 22 deployments are normally covert. The additional course 23 is seven days long. 24 Now, it's probably worth mentioning that both of 25 those officers, the SFC and the TFC, can then go on to</p> <p style="text-align: center;">Page 74</p>	<p>1 signed off as operationally competent. 2 Both officers are obviously operationally competent 3 as well. 4 In order to maintain operational competence they 5 have to do a minimum number of hours a year training 6 with what we call tac refresher or tactical refresher 7 training, which is mandated by the College of Policing. 8 That's normally broken down into two sections. One 9 training course is delivered with a -- it's written by 10 the College of Policing, and then the second course is 11 normally written by the force area, which will have 12 force-specific requirements. 13 Q. Next, the operational firearms commander, working down, 14 the strategic tactical operational firearms commander. 15 What, in a sentence or two, is the function of this 16 role? 17 A. The operational firearms commander puts the plan into 18 action and they command the officers on the ground by 19 actually telling individual officers where they will 20 need to be in order to deliver the plan that the TFC has 21 decided. So that's obviously a very challenging role. 22 Commanding officers on the ground, they need to be 23 an armed officer themselves, they need to be trained in 24 the tactics that are going to be delivered in order to 25 command them, so this is an armed role.</p> <p style="text-align: center;">Page 76</p>

<p>1 That is -- that course is split. The initial 2 course, obviously, is the ARV course, which they have to 3 pass if they are going to be an ARV OFC, or they have to 4 pass the ASO course if they want to be an ASO OFC. 5 Q. Just pause there. We're getting a little bit of acronym 6 overload. 7 A. Yes. 8 Q. ARV is armed response vehicle? 9 A. Armed response vehicle, correct. 10 Q. ASO is? 11 A. Armed surveillance officer. 12 And the OFC obviously is the operational firearms 13 commander. 14 So if you want to be an OFC, you have to be trained 15 in the skill area or the role profile that you are going 16 to command. I know it might seem obvious, but I have to 17 say it. And the course is split into two five-day 18 sections for the OFC course. The first is reces and 19 briefings and the second part of it is tactical. And 20 again, to maintain operational competence, you have to 21 do the same tactical refreshers. 22 Q. Now, we've heard that the team leader of the 23 surveillance team in this case, BX113, has been referred 24 to by various people as an operational firearms 25 commander; is that right?</p> <p style="text-align: center;">Page 77</p>	<p>1 in this operation was the highest level of tactical 2 adviser, having completed the CTSFO course, could give 3 tactical advice on every kind of policing. 4 Q. Just to remind ourselves, we have heard this before, but 5 a CTSFO is counter-terrorism specialist firearms 6 officer? 7 A. That's correct. 8 Q. Is it right that they are authorised firearms officers 9 who are trained and qualified to an even higher level 10 than the armed response officers who go around in marked 11 vehicles? 12 A. Yes, that's correct. So, to put this in context for 13 you, the ASO course, the armed surveillance officer 14 course, is 4 weeks long. The ARV course is 10 weeks 15 long. And the CTSFO has to already be an ARV officer, 16 so has already completed the 10-week course, and then on 17 top of that they do an 18-week CTSFO course. It becomes 18 20 weeks, actually, by the time they've completed the 19 bolt-on elements that the Metropolitan Police requires 20 them to do, which is the additional elements. 21 Q. Back to the tactical adviser in this case, who you told 22 us was qualified as a CTSFO, that high grade. What 23 additional course or courses would that person have 24 undertaken in order to be a tactical adviser? 25 A. So the firearms tactical adviser course again is broken</p> <p style="text-align: center;">Page 79</p>
<p>1 A. That's correct. 2 Q. Would one of the officers in the armed response vehicles 3 who are in backup also be an operational firearms 4 commander? 5 A. That's correct, sir, yes. 6 Q. So there might be a number at any one scene? 7 A. Yes. You can have a number of TFCs and you can have 8 a number of OFCs, but you can only ever have one SFC. 9 There might be geographical or functional 10 responsibilities that you want to devolve to those 11 different individuals. 12 Q. We've also heard from the tactical firearms adviser or 13 firearms tactical adviser in this case about the role he 14 played. Is it right that a tactical adviser will 15 normally be somebody who is a very experienced 16 authorised firearms officer? 17 A. Yes. Again, in order to be a firearms tactical adviser 18 you need to be trained as an armed officer in the 19 tactics that you are going to be advising on. So we 20 only have tactical advisers who are at least ARV trained 21 and then we have tactical advisers who are CTSFO 22 trained. You can only give tactical advice about the 23 tactics for which you are trained and operationally 24 competent in. 25 So the tactical adviser who gave the tactical advice</p> <p style="text-align: center;">Page 78</p>	<p>1 into the spontaneous and pre-planned, and both courses 2 are 5 days in duration with an assessment at the end of 3 each. 4 Q. Again, is the refresher training in order to remain 5 operationally competent? 6 A. It is, but they do an additional 12 hours' firearms 7 tactical device refresher development training within 8 the 12-month period on top of the refresher training 9 that all firearms commanders are required to do. If you 10 remember, the College of Policing mandated training and 11 the MPS mandated training is for all firearms 12 commanders, OFC, SFC and TFC, and the tactical adviser 13 does that too, but they do an additional training. 14 Q. May we now move on to training for armed surveillance 15 officers, ASOs. 16 Most of the Team 3 officers who were surveilling 17 Sudesh Amman on 2 February were armed surveillance 18 officers, ASOs; is that right? 19 A. Yes, correct. It's probably worth pointing out that the 20 situation then and the situation now is slightly 21 different. If an operation is declared an armed 22 operation and surveillance officers are deployed in 23 an armed capacity, it is now a requirement that all 24 surveillance officers are armed. That was not 25 a requirement at the time.</p> <p style="text-align: center;">Page 80</p>

1 MR JUSTICE HILLIARD: So you mean then you could have some
 2 armed, some not; now they all have to be?
 3 **A. Correct, sir. So if the SFC authorises the surveillance**
 4 **is armed, there is no ability any more for the**
 5 **surveillance team to decide, well, we'll have a minimum**
 6 **number armed, some will be taser only, some will be**
 7 **armed. Now it's a national mandate that if it is**
 8 **an armed surveillance operation, everyone must be armed.**
 9 MR HOUGH: I don't know if you're aware in the case we're
 10 concerned with, only one out of a team of nine didn't
 11 have a firearm.
 12 **A. There we are, then they were already significantly**
 13 **ahead.**
 14 Q. In brief, what is the purpose of having armed
 15 surveillance officers, surveillance officers who are
 16 qualified to and may carry firearms?
 17 **A. So the arming of surveillance officers is a contingency.**
 18 **They are armed for their own self-protection in the**
 19 **event of a compromise and also to protect the public in**
 20 **the event of a no-notice incident that requires**
 21 **an immediate firearms response to save life.**
 22 Q. How long is the initial course for an armed surveillance
 23 officer, an ASO?
 24 **A. So the ASO course is 4 weeks long. Would you like me to**
 25 **break it down?**

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1 Q. Before you do, is it right that before doing that course
 2 students will have attended and completed a 3-day taser
 3 course?
 4 **A. That's right. There are a couple of prerequisites for**
 5 **attendance on the armed surveillance officers course.**
 6 **For one, they must already be surveillance trained, so**
 7 **that's a prerequisite. Then they do a 2-day ballistic**
 8 **first-aid course, which is part of the National Firearms**
 9 **Training Curriculum. It's designated as D13.1. That**
 10 **will become relevant later. Then they have to do the**
 11 **taser course.**
 12 Q. You were going just to break down the 4-week initial
 13 armed surveillance officer course for us.
 14 **A. Okay, so the first week of that course is focused on**
 15 **teaching an officer who's never fired a gun before to**
 16 **fire the Glock SLP, the self-loading pistol.**
 17 **The Metropolitan Police has uses a number of Glocks.**
 18 **If you want to know all the different Glocks we use and**
 19 **why, I can tell you.**
 20 **But the first week of the course teaches them how to**
 21 **shoot, carriage positions, weapon drills, loading**
 22 **unloading, cleaning, accurate shooting. It introduces**
 23 **oral warnings and how to use them, identification**
 24 **drills, so how to draw your weapon, shoot and identify**
 25 **yourself as a police officer by putting on your**

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1 **high-visibility cap.**
 2 **The first week culminates in a classification shoot,**
 3 **which is a pass or fail, for accuracy and drills and**
 4 **safety.**
 5 **I think you've heard about the officers carrying**
 6 **a Glock 17. So a Glock 17 is the standard Glock**
 7 **which -- which all armed officers would carry, if**
 8 **they're carrying a Glock. It carries 17 rounds and it**
 9 **is a standard firearm. There's also a slightly smaller**
 10 **variant called the Glock 19, which carries 15 rounds.**
 11 **The number doesn't designate the number of rounds it**
 12 **carries.**
 13 Q. We have heard in fact that both of those types of Glock
 14 were held by different officers, obviously each officer
 15 only having one, but they were represented among the
 16 surveillance officers in this case.
 17 **A. It's a personal choice on the size of the grip and the**
 18 **type of weapon.**
 19 Q. Is there anything more to the breakdown of the course
 20 that you wanted to tell us?
 21 **A. Okay, so week 2 introduces tactics. So now the students**
 22 **can shoot, the tactical environment, the tactical**
 23 **training is implemented. That training involves the use**
 24 **of paint or marker rounds and blank ammunition with live**
 25 **stooges, so that's instructors who pretend to be**

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1 **criminals or third parties.**
 2 **They're taken through basic firearms tactics.**
 3 **Mobile containment. Weapon retention, which is how to**
 4 **keep your weapon and stop yourself being disarmed.**
 5 **Subject-handling containment, cover and movement.**
 6 **They -- they are trained how to shoot moving targets.**
 7 **They shoot a moving target using Simunitions, which is**
 8 **the paint round I talked about, so it is -- it looks**
 9 **like a bullet, it is ejected from a conventional weapon,**
 10 **but instead of having a bullet at the end, it's a sort**
 11 **of waxy paint round that is ejected, similar to but not**
 12 **quite the same as paintball. It is much more accurate**
 13 **and the weapon operates as a weapon would normally**
 14 **operate. They're taught how to contain buildings. They**
 15 **go on the judgment range. And, as I say, they are**
 16 **taught how to shoot moving targets, which is**
 17 **track-and-ambush techniques, which I can explain if you**
 18 **want.**
 19 Q. I don't think we need to go into quite that detail.
 20 **A. Okay.**
 21 Q. I think you were continuing with the breakdown of the
 22 course.
 23 **A. So week 3, continues the tactics. It introduces**
 24 **extreme-threat scenarios, post-incident procedure. It**
 25 **deals with stops involving vehicles. And then, at the**

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<p>1 culmination of all of that, there is a tactics 2 assessment, which is a requirement for them to pass 3 before they move into week 4. 4 Week 4 deals with searching. It introduces the 5 national single system of search. ASOs, armed 6 surveillance officers, are only required to be trained 7 up to the basic level of emergency search. We wouldn't 8 want them to go in and do a pre-planned search, what we 9 use to call slow searched contact. We wouldn't want 10 them to do that. It's a deliberate search now. We 11 wouldn't want them to do a dynamic search, which is what 12 CTSFOs do. So they are just required to be able to 13 enter, use the single system of search in order to 14 mitigate an emergency threat to life, that kind of 15 scenario, in a building. 16 Q. Now we have seen in some of the firearms documents in 17 this case, in the FA1 and FA5 documents, various 18 references to armed surveillance officers not being 19 trained in pedestrian interception tactics and that 20 being a limitation on their training. 21 Can you explain this to us and tell us what, if 22 anything, in relation to dealing with pedestrians, ASOs, 23 armed surveillance officers, are not taught to do? 24 A. Okay. So, in order to explain this we need to 25 understand the difference between some key bits of</p> <p style="text-align: center;">Page 85</p>	<p>1 planning to do it. And the basic AFOs or ASOs are not 2 trained to do a planned interception. There's also the 3 possibility to do a planned intervention, and the only 4 people that are trained to do a planned intervention are 5 CTSFOs. That's if it's planned. 6 So an example of a planned intervention might be 7 a bank robbery, where we are waiting for the bank 8 robbers to actually turn up and start to commit the 9 offence, or it might be a hostage that's already been 10 taken and we're doing a hostage rescue, and the offence 11 is already in motion. 12 But what we have here in the incident that happened 13 on the day was a spontaneous requirement for an 14 intervention, which every kind of armed officer is 15 trained to deal with. 16 Q. ASOs are trained, and you describe some of the training 17 that might be relevant to that, ASOs, surveillance 18 officers, are trained to intercept and deal with 19 somebody who presents an immediate threat to members of 20 the public and to themselves spontaneously? 21 A. Correct. 22 Q. If, however, it had proved necessary to stop 23 Sudesh Amman in a planned way, for example, if he'd 24 bought the knife, was on his way back to the approved 25 premises, and he had ripped open the packaging on</p> <p style="text-align: center;">Page 87</p>
<p>1 terminology and that is the difference between 2 interception and intervention. All AFOs, and any role 3 profile of armed officer is AFO, they're all trained to 4 carry out a no-notice spontaneous intervention on the 5 street, and that is to deal with something that is in 6 front of them, be it subjects on foot or subjects in 7 vehicles. So they do have training to deal with people 8 on foot and they do have training to deal with subjects 9 in vehicles. 10 Q. Just pause there. By "they", you include in that armed 11 surveillance officers? 12 A. Correct. 13 Q. They are trained to deal with people on foot? 14 A. Correct. 15 Q. What do you mean by "deal with people on foot"? 16 A. So, implement a foot interception as required if 17 something is happening immediately in front of them. 18 There is a difference, then, between intervention 19 and interception and planned and spontaneous. What you 20 wouldn't want to do with an armed surveillance officer 21 is plan to carry out an interception. 22 So an interception is something that is required 23 before an offence happens. Before the criminal or the 24 subject has carried out a criminal act, you're 25 intercepting before they do it and you would then be</p> <p style="text-align: center;">Page 86</p>	<p>1 a quiet side street, then the tipping points that were 2 agreed indicated that he should be stopped and arrested 3 at that point. Would an ASO be trained to do that, 4 forgetting for the moment whether it would be a good 5 idea to have them do it at all? 6 A. Okay, so they could do it in extremis, but the TFC would 7 not choose to use them because the correct resources to 8 do it, because you are now planning for an interception, 9 are the ARVs that I've been -- held nearby as 10 a contingency. 11 Q. But, is this right, if a tactical firearms commander 12 decided that there needed to be a very quick but planned 13 stop of a subject to prevent him posing a danger, that 14 could be done with armed surveillance officers? 15 A. It could be done, in theory. They could do it, yes. 16 Q. And they would have the training to do it? 17 A. Well, the training they've been exposed to during their 18 course would give them the ability to do that, yes, 19 because they are trained in armed inquiry, close quarter 20 containment and challenging cover, so they could carry 21 that out. However, there is a difference to the amount 22 of time they get on those areas, so the correct 23 resources, if there is time, are the ARV officers or a 24 MASTS team, if a MASTS team was attached to this 25 operation, which it wasn't.</p> <p style="text-align: center;">Page 88</p>

<p>1 Q. A MASTS team is a Mobile Armed Support To Surveillance 2 team? 3 A. Correct. 4 Q. Consisting of covert firearms officers? 5 A. Correct. Covert counter-terrorism specialist firearms 6 officers. So the TFC has to weigh up whether or not the 7 subject who now requires an interception, whether there 8 is time to call in the ARVs, which are the correct 9 resources, or the MASTS, if they are attached to the 10 operation, before they get to the address or to some 11 future intended victim. If there is time, you'll use 12 the appropriate resources. If there isn't, because of 13 collapsing time frame, it is possible to use the ASOs. 14 Q. Thank you. 15 Back to the training for armed surveillance 16 officers. 17 After the initial course, what amount of refresher 18 training do armed surveillance officers have to have in 19 order to remain operationally competent? 20 A. So, they have to complete a minimum of 44 hours of 21 training per year. Each officer. 22 Q. And will that include, for example, firearms shoots to 23 determine accuracy? 24 A. Yes, there's two classification shoots per year, and 25 that's a national classification shoot, and then an MPS</p> <p style="text-align: center;">Page 89</p>	<p>1 A. Yes, sir. 2 Q. In cycle B, were there again a range of scenarios, 3 including where a subject might confront the officers 4 surveilling them? 5 A. That's correct. 6 Q. Subjects attacking their surveillance team? 7 A. That's correct, sir, yes. 8 Q. And subjects attacking other people? 9 A. That's right. In fact, in one of the cycles -- I think 10 it was cycle B -- one of the scenarios was very similar 11 to the situation they faced on the street: a subject 12 armed with a knife that then was later found to have 13 a suicide vest. 14 Q. Now, is it right as regards the first-aid training that 15 you refer to, that armed surveillance officers, like 16 other authorised firearms officers, are required to 17 undergo emergency life support training, so first-aid 18 training to a higher level than the very basic police 19 officer training? 20 A. Yes. All firearms officers have a higher level of 21 first-aid training than ordinary police officers. 22 Q. And in short, what is the additional content that they 23 get? 24 A. The use of hemostatic gauzes, trauma, knife injuries, 25 some basic ballistic first-aid, compression seals,</p> <p style="text-align: center;">Page 91</p>
<p>1 classification shoot combined with two development 2 shoots per year. 3 Q. Will there also be tactical training days? 4 A. Correct. 5 Q. Training in matters such as first-aid and taser use? 6 A. Yes, that's correct. 7 Q. Now, in the training year, 2019/20, is it right that 8 ASOs, armed surveillance officers, received training in 9 two cycles? 10 A. Yes, that's right. 11 Q. One between April and September 2019? 12 A. Yes, that's correct. 13 Q. And one between October 2019 and March 2020? 14 A. That's correct, yes, cycles A and B. 15 Q. Did each of those cycles involve a range of different 16 practical scenario exercises? 17 A. They did, sir. Yes, that's right. 18 Q. In cycle A, did those involve multiple scenarios 19 featuring counter-terrorism subjects? 20 A. That's right, yes. 21 Q. Including such scenarios involving explosive devices? 22 A. That's correct. 23 Q. Scenarios involving critical shots being fired? 24 A. Correct. 25 Q. And scenarios involving a covert approach?</p> <p style="text-align: center;">Page 90</p>	<p>1 Russell dressings, those sort of things, for chest 2 wounds. 3 Q. So, still not perhaps quite as much training as 4 a paramedic will receive? 5 A. No. 6 Q. But materially more and beneficial for situations 7 involving knife or ballistic injuries? 8 A. Absolutely. And then there are additional courses that 9 some armed officers go on which are even longer than 10 that. The D13.2 is the medics course, which some ARV 11 officers go on. Not all, but some, quite a few. That's 12 a week's course, and those ARV officers that arrived at 13 the scene would have undertaken that, dealing with even 14 more trauma. 15 Q. May I turn to ask you some practical questions about how 16 officers are trained to do certain sorts of things. 17 First of all, training about the threshold for the 18 use of a firearm. 19 What, in general, is the training that firearms 20 officers, including armed surveillance officers, are 21 given about the circumstances in which a firearm can, 22 first of all, be drawn, and secondly, fired at a person? 23 A. So, in all of the stages of dealing with an incident, be 24 it firearms officer or indeed the commander, you're 25 using the National Decision Model. The firearms</p> <p style="text-align: center;">Page 92</p>

1 officers are taught to use that model to weigh up all of
 2 the information and intelligence that is available to
 3 them, everything they can see in front of them, to
 4 quickly run through in their minds what they're facing,
 5 what the legal implications are, what the threat is, who
 6 is at threat, and then it's a question of
 7 proportionality, about how I'm going to mitigate that
 8 threat either to save my own life or indeed other
 9 members of the public.
 10 That decision to draw the weapon and ultimately fire
 11 it is a personal decision that the officer has to make
 12 based on all of the prevailing circumstances,
 13 understanding the law, the implications, and what is
 14 proportionate to the circumstances. So a great deal of
 15 the training obviously is the law and understanding the
 16 implications of their actions and the fact that they
 17 might ultimately be required to explain in
 18 an environment such as this and justify their action.
 19 Q. Now, we've heard officers refer to the taser as the
 20 non-lethal option and to other weapons as other options.
 21 A. Correct.
 22 Q. How are officers taught to approach the choice of weapon
 23 for the environment?
 24 A. Again, that is a personal choice for the officer based
 25 on the prevailing circumstances. In this situation,

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1 what you've got to bear in mind, that they've closed the
 2 gap on a subject that's armed with a knife. A knife is
 3 a lethal weapon. Taser, whilst an excellent less lethal
 4 option, which has proven to be extremely useful for the
 5 police, does not work all the time. I'll give you some
 6 explanations. It works about 70 to 75 per cent of the
 7 time in the summer, when people are wearing t-shirts and
 8 very, very loose, thin clothing, but it only works
 9 between 45 and 49 per cent of the time in the winter,
 10 when people are wearing heavier clothing. It has some
 11 limitations in terms of range, so it's got a maximum
 12 range of 21 feet or 6.4 metres, but it also has
 13 a minimum range, in that the barbs, once they connect
 14 with the body, must be at least 9 inches apart in order
 15 to achieve neuromuscular interruption of the nervous
 16 system and incapacitation.
 17 So when the taser is fired, the top barb fires where
 18 the red dot indicates, the laser red dot, but the bottom
 19 barb, which is slightly offset to the right, is at
 20 an angle that fires downwards. So the further away you
 21 are, the greater the degree of divergence between the
 22 two barbs. 21 feet is the maximum, and you're likely to
 23 hit one of the legs at that range, the chest and one of
 24 them in the legs. That's possible to miss. Obviously
 25 you don't want to be too close.

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1 Now, you only get one go at somebody lunging at you
 2 with a knife, so I would expect the officers to use
 3 their primary weapon in those circumstances, which would
 4 be their firearm. A taser would have been inappropriate
 5 in these circumstances with a man lunging at you with
 6 a knife, especially given that he's already stabbed
 7 people.
 8 Q. May I just ask a couple of questions just so we ensure
 9 that we understand about the use of a taser. A taser
 10 operates, is this right, by firing two barbs from the
 11 taser unit?
 12 A. Correct.
 13 Q. Each barb operates as an electrode?
 14 A. Correct.
 15 Q. And they remain connected to the unit by wires?
 16 A. That's right.
 17 Q. You fire the unit or discharge the unit within the
 18 maximum and minimum distance that you've told us?
 19 A. That's correct.
 20 Q. The objective being to get both barbs into, ideally, the
 21 skin of the subject?
 22 A. That's right sir, yes.
 23 Q. And if you -- if you get them into the skin of the
 24 subject between those two distances, the idea is that
 25 they will be a requisite distance apart?

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1 A. Yes, a minimum of 9 inches, otherwise it won't cause the
 2 neuromuscular effect, incapacitation.
 3 Q. On the barbs connecting, if they're within the right
 4 distance of each other, an electric circuit is
 5 completed, and that disrupts voluntary control of the
 6 muscles?
 7 A. That's correct, sir, yes.
 8 Q. Somebody goes down?
 9 A. Yes.
 10 Q. What you've told us is that this is only realistically
 11 usable if the barbs are likely to penetrate clothing?
 12 A. Correct.
 13 Q. And it's only usable if one can fire from the correct
 14 distance to get the barbs the right distance apart?
 15 A. That's right.
 16 Q. And you only get one chance?
 17 A. That's right.
 18 Q. And with these three limitations, you're saying that
 19 a taser is not a good choice for dealing with somebody
 20 in heavy clothing moving a short distance from you with
 21 a knife?
 22 A. That's correct sir, yes.
 23 The other thing to bear in mind in this particular
 24 case is the reactionary gap. Now, the reactionary gap
 25 is also 21 feet. It takes an officer -- an officer will

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1 need 21 feet at least in order to draw a firearm, point
 2 and shoot somebody lunging at them with a knife. Less
 3 than that, the person with the knife will win because
 4 action always beats reaction. That's the absolute
 5 minimum distance. You know, fast people can actually
 6 cover that ground very, very quickly. It's frightening
 7 how quickly people can actually cover the reactionary
 8 gap.
 9 Q. We've heard from both officers and bystanders about
 10 commands or warnings that were shouted by the armed
 11 surveillance officers in this case.
 12 A. Mm-hm.
 13 Q. You are aware of that evidence?
 14 A. Yes.
 15 Q. In broad terms, what are officers such as these armed
 16 surveillance officers taught about the use of oral
 17 warnings or commands?
 18 A. So I think the curriculum is probably the most useful
 19 element, so I'll just articulate it.
 20 Where circumstances permit, AFOs should identify
 21 themselves as armed officers and give a clear direction
 22 to the subject allowing sufficient time for the
 23 directions to be observed, unless to do so would unduly
 24 place any person at risk or would clearly be
 25 inappropriate or pointless in the circumstances of the

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1 incident.
 2 So you wouldn't want to give an oral warning to
 3 somebody that was just gonna turn around and shoot you,
 4 if that's what you felt they were gonna do, and in these
 5 circumstances it wasn't strictly necessary. However,
 6 they did, and they did so very bravely, because
 7 I believe what they were trying to do was actually get
 8 the individual to focus their attention on them as
 9 opposed to members of the public.
 10 Q. Next, please, training about the target area. We've
 11 heard a little about this from the officers themselves,
 12 but I think it's important that we hear about it from
 13 you as somebody representing those who compose the
 14 training.
 15 In general terms, what are officers taught about the
 16 target area on which to fire when they determine that
 17 it's necessary or appropriate to fire at an individual?
 18 A. Okay, so there are two types of shots: a conventional
 19 shot and a critical shot.
 20 A conventional shot, which is what this was, is in
 21 the central body mass area, the torso of the individual.
 22 And the main reason for that is it is the largest area
 23 and it is likely to result in the stopping of the
 24 subject doing whatever it is they're doing.
 25 We don't train officers to shoot to injure because

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1 that doesn't take away the threat. It's also
 2 an incredibly difficult shot, to shoot somebody in the
 3 arms or legs or hands. Very, very unrealistic,
 4 regardless of whatever you might have seen on films.
 5 The central body mass area is the target area to aim
 6 for, for a conventional shot.
 7 A critical shot may well be a head shot to bring
 8 about instant incapacitation with absolutely no risk
 9 that the subject would be able to do anything else.
 10 We're not talking about critical shots in this
 11 situation.
 12 Q. Nobody was trying to make a critical shot or directed to
 13 make a critical shot in this case?
 14 A. Absolutely not.
 15 Q. Next, improvised explosive devices. You've told us that
 16 some of the training dealt with IEDs and how to handle
 17 them. What are officers taught about how to deal with
 18 the situation where they see what is or might be an IED
 19 on a suspect?
 20 A. So, any potential improvised explosive device is treated
 21 as if it is real until it is known otherwise. And the
 22 only time it is known otherwise is when somebody
 23 qualified to examine it and make that determination has
 24 arrived and made that determination. So every kind of
 25 IED if suspected is real until it is known not to be.

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1 Q. What approach is, according to the training, to be taken
 2 to an IED on a person where that person appears to be
 3 fully incapacitated or even dead?
 4 A. Sorry, can you repeat that?
 5 Q. So where you have somebody who seems fully
 6 incapacitated, or even dead, who has what appears an IED
 7 on them, what approach is to be taken to that situation?
 8 A. Okay. So, improvised explosive devices are normally
 9 known to be extremely volatile. If they contain the
 10 explosive TATP or something similar, they can detonate
 11 without the individual who was wearing it necessarily
 12 initiating it. So you never know how volatile the
 13 mixture is or how good the mixture is. It could
 14 detonate at any time. Indeed, somebody who appears to
 15 be dead, without knowing what the trigger mechanism is,
 16 might be able to trigger it.
 17 So you would be moving back to minimum distances,
 18 which for a briefcase-size explosive device or a device
 19 like this would be a minimum of 50 metres.
 20 It's worth pointing out the bravery of the officers
 21 involved in these case, actually. Because, having
 22 reviewed the CCTV, they are in a dilemma in that they
 23 want to maintain firearms cover on the individual with
 24 their Glocks. The Glock is a much more difficult weapon
 25 to fire than carbine. They classify at 20 metres.

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<p>1 Beyond 20 metres is very difficult to be accurate. So 2 they're having to remain firearms cover on the subject 3 to see if he moves or does anything else or presents 4 a threat to anybody else or looks like he might detonate 5 the device, in which case further shots would be 6 required. At the same time, there are a large number of 7 members of the public on the street, on the pavements, 8 cars coming along.</p> <p>9 So what you can see is officers keeping inside the 10 50 metres in order to protect the public. One officer 11 moves into the road. He's not in an ideal situation in 12 terms of cover, but he's doing that in order to prevent 13 cars coming down and passing what could be an explosive 14 device.</p> <p>15 I think you have to recognise the bravery of those 16 officers doing that.</p> <p>17 Q. Is there any training given or guidance given on the 18 circumstances in which first-aid may or should be given, 19 whether by officers themselves or paramedics at the 20 scene, to a person who has a suspected IED?</p> <p>21 A. So, separating out the IED, first of all, you'll know, 22 I'm sure, that we always will try and do first-aid on 23 any member of the public that's been shot or tasered, 24 and officers are trained to do that and will move 25 forward immediately, even though that person was trying</p> <p style="text-align: center;">Page 101</p>	<p>1 with training?</p> <p>2 A. I would expect them to fire.</p> <p>3 MR HOUGH: Thank you very much, those are all the questions 4 I have. We'll see if any other advocates have any 5 questions. First, Mr Menon.</p> <p>6 MR MENON: No, thank you. I have no questions.</p> <p>7 MR HOUGH: Mr Sheldon does.</p> <p>8 MR JUSTICE HILLIARD: Mr Sheldon, do you mind if I just ask 9 a question before you do in case you want to ask 10 anything out of it?</p> <p>11 It's just this, I think you're probably someone that 12 can help us. We know, as I am sure you do, that at one 13 point in this operation when there were armed 14 surveillance officers, something -- and you've mentioned 15 it earlier -- but something called a MASTS team was put 16 on standby at one point and then stood down, and we 17 heard, I think, that there were two armed response 18 vehicles in Streatham?</p> <p>19 A. Mm-hm.</p> <p>20 MR JUSTICE HILLIARD: I just want you to just to help me 21 a bit with this. Armed response vehicle, have I got 22 this right, that's a marked car with uniformed officers, 23 in short, with firearms in it? Is that just broadly 24 that one?</p> <p>25 A. Yes, that's correct.</p> <p style="text-align: center;">Page 103</p>
<p>1 to threaten them moments ago. Unfortunately, we're not 2 able to do that if they're wearing a suicide device or 3 an improvised explosive device. It's just too 4 dangerous; it could go off at any time. So, 5 unfortunately, the wearing of that device prevents us 6 from moving forward and performing any first-aid.</p> <p>7 Q. Finally, just some hypothetical questions based on the 8 training that officers are given.</p> <p>9 If a trained armed surveillance officer is 10 confronted by a subject who is known to be dangerous, 11 who has stolen a knife and who has removed the packaging 12 from that knife in a public area with members of the 13 public around, what in general would be the response you 14 would expect in accordance with the training?</p> <p>15 A. So I'd -- I'd expect them to intervene, to do exactly 16 what they've done, to move forward, to challenge the 17 individual. A surrender would be ideal and negate the 18 need to fire shots, but that wasn't possible in these 19 circumstances because he obviously attacked people and 20 stabbed them and was then lunging at them.</p> <p>21 Q. If the subject, again in general terms based on 22 training, confronts a trained armed surveillance officer 23 with a knife moving towards them, closing the 24 reactionary gap and having not responded to shouted 25 commands, what response would you expect in accordance</p> <p style="text-align: center;">Page 102</p>	<p>1 MR JUSTICE HILLIARD: Then the MASTS team -- MASTS, I think, 2 stands for Mobile Armed Support To Surveillance; is that 3 right?</p> <p>4 A. Correct sir.</p> <p>5 MR JUSTICE HILLIARD: That's a covert team?</p> <p>6 A. Yes.</p> <p>7 MR JUSTICE HILLIARD: And can you help with this. I don't 8 want more detail or you to say anything that really 9 gives away too much information. For a very good reason 10 in this inquest we've heard an awful lot about 11 a surveillance operation and how one works.</p> <p>12 A. Mm-hm.</p> <p>13 MR JUSTICE HILLIARD: I don't want to add unnecessarily to 14 that, but can you just help me. If a MASTS team is 15 deployed, can you, as it were, safely tell us all 16 roughly what it does or in the most general terms?</p> <p>17 A. Okay.</p> <p>18 MR JUSTICE HILLIARD: Have you got the drift of my --</p> <p>19 A. Yes.</p> <p>20 MR JUSTICE HILLIARD: I just want to hear the broad idea.</p> <p>21 A. Do you want to know if there would have been any 22 difference if a MASTS team had been deployed?</p> <p>23 MR JUSTICE HILLIARD: Not particularly. I just want to know 24 is it just a number of people who actually go to the 25 area? Just roughly, and very slowly.</p> <p style="text-align: center;">Page 104</p>

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<p>1 A. So the difference between the ARVs being nearby and 2 a MASTS team is MASTS officers are trained in 3 surveillance so they can move into the surveillance 4 footprint. Not -- they wouldn't be right on top of the 5 subject, they wouldn't take over surveillance, they 6 wouldn't take surveillance control; they would simply be 7 a bit closer to minimise the risk of compromising the 8 operation. 9 ARVs, because they are overt in nature, have to sit 10 just outside the surveillance bubble and follow the 11 surveillance around at a distance. 12 Now, it would not have made any difference at all if 13 a MASTS team were deployed on this operation. They 14 simply would not have been in a position to respond as 15 quickly as the armed surveillance officers would have 16 done. We have often said that if armed surveillance 17 officers are behind a subject who attacks people 18 spontaneously with no notice, it doesn't matter how many 19 resources we wrap around the surveillance, it will 20 unfortunately be the surveillance officers themselves -- 21 MR JUSTICE HILLIARD: It falls to the surveillance 22 officers -- 23 A. -- because they are right on top of the subject. 24 MR JUSTICE HILLIARD: All right. 25 A. It takes -- it takes longer for ARV officers and MASTS</p> <p style="text-align: center;">Page 105</p>	<p>1 kind of thing, yes, as both a TFC and an SFC. 2 Q. Yes, I was going to just ensure that I had understood 3 you to say earlier that you have in fact acted as TFC in 4 terrorism operations of this type? 5 A. I have sir, extensively. 6 Q. Now, one of the issues that has been considered in the 7 evidence thus far has been the potential for a stop and 8 arrest of Sudesh Amman in the period between leaving the 9 approved premises on the Sunday of the attack and the 10 attack itself. 11 A. Okay, yes. 12 Q. To the extent that it makes any difference to the 13 questions or answers that we're about to exchange, 14 that's a period of 32 minutes. 15 A. (Nodded assent) 16 Q. Now, let's imagine that at some point during that period 17 armed surveillance officers who are covering a subject 18 consider that he is behaving sufficiently strangely, or 19 suspiciously, to merit a potential stop or search. 20 A. Okay. 21 Q. Not attacking anybody, not appearing about to attack -- 22 to be about to attack anybody, but acting in 23 a suspicious manner; okay? 24 A. Mm-hm. 25 Q. And let's imagine that the TFC is contacted in those</p> <p style="text-align: center;">Page 107</p>
<p>1 to arrive. 2 MR JUSTICE HILLIARD: I've got you. I'm very grateful. 3 I don't need any more detail than that. Thank you very 4 much. 5 Questions by MR SHELDON 6 MR SHELDON: Thank you very much, sir. 7 Superintendent McKibbin -- I don't know if that is 8 going to take you too far away from the microphone or 9 maybe even stand up for what won't be very long, I can 10 assure you. I'm grateful. 11 Superintendent McKibbin, as you are no doubt aware, 12 I represent the Metropolitan Police in this inquest. 13 A. Yes. 14 Q. I'm not going to ask you to comment on the particular 15 circumstances and decision-making in this case, but 16 there are two matters of general policy and procedure 17 that I would be very grateful for your assistance. 18 The first concerns the role of the TFC in 19 an operation of this nature, and by "operation of this 20 nature" I mean an intelligence-led investigation of 21 a terrorist offender by SO15 and MI5. 22 A. Yes, sir. 23 Q. An operation of which you have plenty of experience, 24 I think? 25 A. I have quite a lot of experience of dealing with this</p> <p style="text-align: center;">Page 106</p>	<p>1 circumstances. 2 A. (Nodded assent) 3 Q. What options would be open to the TFC in that scenario? 4 A. Okay. Under those circumstances that you've just 5 described, no TFC will take unilateral action on their 6 own. Although the TFC is in tactical command of the 7 deployment, they are still working in collaboration with 8 the CTSIO, the counter-terrorism senior investigating 9 officer, or whoever has delegated responsibility in the 10 investigation room. 11 The investigation has been running for some time, 12 I'm sure. I've been involved in lots of 13 counter-terrorism operations. They're not short-lived. 14 Lots of planning, extensive deployments. No TFC is 15 going to make unilateral decisions based on that kind of 16 information. Subject acting suspiciously means what? 17 You are trying to achieve sustained public protection in 18 any kind of firearms deployment whether it's criminal or 19 terrorism. You are trying to achieve an outcome that 20 will result in the individual no longer being a threat 21 to the public. We are in the business of 22 risk-management, not risk-avoidance, and avoiding the 23 risk really just displaces the risk to another day. 24 Actually, if we intervene too early, if we 25 stop-and-search the individual and find nothing, or if</p> <p style="text-align: center;">Page 108</p>

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<p>1 we tip our hand that we are mounting some kind of</p> <p>2 operation on them, all you've done is displaced the risk</p> <p>3 to another day when actually we'll have no control over</p> <p>4 them because they'll know about our presence, they'll</p> <p>5 change their plans and do something completely</p> <p>6 different, and then we'll have actually increased the</p> <p>7 risk to the public, not reduced it.</p> <p>8 So what the TFC will want to do is ask the</p> <p>9 surveillance officers why they feel that, speak to the</p> <p>10 CTSIO in the circumstances you just described, and see</p> <p>11 if there's any evidence of an offence and whether or not</p> <p>12 we've reached a threshold for a stop and arrest.</p> <p>13 In the circumstances that you've just described,</p> <p>14 hypothetical, that would not reach any kind of threshold</p> <p>15 for anyone to take any kind of mitigating action.</p> <p>16 Q. Just so that we don't get lost in the acronyms,</p> <p>17 Superintendent McKibbin, the CTSIO is the senior</p> <p>18 investigating officer of the counter-terrorism</p> <p>19 investigation?</p> <p>20 A. Correct sir.</p> <p>21 Q. SO15. In this particular case, just so that we are all</p> <p>22 clear, HA6.</p> <p>23 A. Okay.</p> <p>24 Q. So the first thing, if I've understood you correctly,</p> <p>25 that the TFC would do is consult with the senior</p> <p style="text-align: center;">Page 109</p>	<p>1 However, certain SFCs might put in their requirements,</p> <p>2 in their authority, a requirement to contact them if</p> <p>3 certain points are reached. So if there is time, it</p> <p>4 might be ideal. It's not absolutely necessary.</p> <p>5 Q. Now, you've indicated circumstances in which a TFC, in</p> <p>6 your experience and judgment, would be highly unlikely</p> <p>7 to order an intervention, merely acting in suspiciously.</p> <p>8 Can you assist us with the sort of circumstances in</p> <p>9 which you would expect a TFC, in consultation with</p> <p>10 an SIO, if time permitted, to order an intervention to</p> <p>11 take place?</p> <p>12 A. Okay, so you've heard during the course of this about</p> <p>13 tipping points. Even if the TFC had become aware that</p> <p>14 all the SIO's tipping points had been reached, they</p> <p>15 would still, if there was time, speak to the CTSIO to be</p> <p>16 sure that now is the appropriate time to implement the</p> <p>17 tactics that the TFC would choose.</p> <p>18 So the TFC would choose the type of interception or</p> <p>19 intervention, but in consultation with the SIO would</p> <p>20 indicate when, once the evidential threshold had been</p> <p>21 reached. So even if the tipping point had been reached</p> <p>22 you'd still, if there was time, have a consultation.</p> <p>23 You wouldn't necessarily need to ring the SFC. It would</p> <p>24 be ideal if there is time.</p> <p>25 Q. We have a scenario where somebody is posing an immediate</p> <p style="text-align: center;">Page 111</p>
<p>1 investigating officer of the counter-terrorism</p> <p>2 investigation to understand the strategy, understand the</p> <p>3 stage of the investigation and to discuss what the</p> <p>4 options might be?</p> <p>5 A. Exactly.</p> <p>6 Q. Would the --</p> <p>7 A. Those two --</p> <p>8 Q. I'm so sorry, do go on.</p> <p>9 A. Absolutely. And the two -- the two officers working</p> <p>10 together in collaboration need to satisfy themselves</p> <p>11 that it's the appropriate time to act. If there is time</p> <p>12 to do so, and in the hypothetical scenario you've just</p> <p>13 described there is time. Go too soon, you ruin the</p> <p>14 operation; go too late, it's too late.</p> <p>15 Q. What about consultation with the SFC, the strategic</p> <p>16 firearms commander? Because I understood you to say</p> <p>17 that the TFC is in fact implementing the strategy of the</p> <p>18 SFC?</p> <p>19 A. Absolutely right.</p> <p>20 Q. So would there be a need for consultation there as well,</p> <p>21 if time permitted?</p> <p>22 A. Not necessarily, because the SFC has already authorised</p> <p>23 a range of tactics. So, as long as the TFC isn't</p> <p>24 stepping outside of the agreed range of tactics, it's</p> <p>25 not absolute necessary to discuss with the SFC.</p> <p style="text-align: center;">Page 110</p>	<p>1 threat to members of the public, stabbing people, for</p> <p>2 example, and you've been very clear as to what you would</p> <p>3 expect armed officers in the vicinity to do in that</p> <p>4 situation: act on their own initiative to protect</p> <p>5 themselves and protect the public.</p> <p>6 A. Yes.</p> <p>7 Q. You've indicated what you would expect to happen if</p> <p>8 an individual was acting suspiciously in the context of</p> <p>9 a sophisticated investigation of this sort and the</p> <p>10 consultation that would take place between the TFC and</p> <p>11 the SIO.</p> <p>12 A. Yes.</p> <p>13 Q. Is there any room in the middle of those two scenarios</p> <p>14 whereby the TFC might realistically order unilaterally</p> <p>15 an intervention?</p> <p>16 A. If -- if the subject was representing such a risk or</p> <p>17 such an immediate risk to the public but wasn't actually</p> <p>18 stabbing people -- so he's gone in, he's grabbed the</p> <p>19 knife and he's run out and he's not actually stabbed</p> <p>20 anyone yet -- and the TFC is aware of all of that, then</p> <p>21 possibly. But in an ideal situation you would have</p> <p>22 a consultation with the SIO.</p> <p>23 In that kind of scenario the AFOs are pretty much</p> <p>24 going to respond on their own anyway.</p> <p>25 Q. All right. Again, just finally on this topic. If, in</p> <p style="text-align: center;">Page 112</p>

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1 consultation with the SIO, it is decided to stage some
 2 form of intervention on the basis that the individual is
 3 acting suspiciously, it would be the armed officers in
 4 the ARV that you would use for that purpose, provided
 5 there was no practical reason why you couldn't?
 6 **A. Absolutely. And there are a number of reasons for that,**
 7 **not just the training, as I articulated earlier, but**
 8 **obviously you don't want to compromise your covert**
 9 **assets. So you have armed officers around the corner**
 10 **that are available to do it, they have more training to**
 11 **do the planned interception, and they don't compromise**
 12 **the operation. So you would call in the ARVs to put in**
 13 **the foot interception or vehicle interception or**
 14 **whatever kind of interception was required.**
 15 Q. Final topic, please, and that's the topic of searching.
 16 Another scenario we have been considering in the course
 17 of the evidence is the possibility of an overt search
 18 being conducted of the approved premises following the
 19 suspicious purchases that were made on the Friday, the
 20 31st.
 21 As I think you're aware, Superintendent McKibbin,
 22 there was a JOT, joint operational team meeting, that
 23 Friday evening to decide what to do in response to those
 24 purchases.
 25 Now, let's just imagine, for the purposes of this

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1 question, that a decision was taken at that JOT by the
 2 police and MI5 to conduct an overt search of the
 3 approved premises in the hope of finding, perhaps,
 4 a constructed fake suicide belt.
 5 First question: if that scenario had arisen, would
 6 you expect a search of that nature to be supported by
 7 armed officers?
 8 **A. Absolutely, yes, sir. It would have to be.**
 9 Q. Why would it have to be?
 10 **A. Well, based on the threat and risk.**
 11 **So you've got an armed deployment already that's**
 12 **been authorised for armed surveillance. That suggests**
 13 **the very nature of the threat requires an armed**
 14 **response. Whatever that response is going to be, it's**
 15 **going to be required to be armed, so when we do a search**
 16 **of the address we would require probably CTSFOs or ARVs**
 17 **to do a limited entry containment and call-out in order**
 18 **to execute the search warrant. That would be quite**
 19 **a significant undertaking.**
 20 Q. First of all, there would need to be a warrant, would
 21 there?
 22 **A. There would of course need to be a warrant.**
 23 Q. So let's assume that on the Saturday, the decision
 24 having been taken on the Friday evening, a warrant is
 25 obtained from a court to search the approved premises.

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1 Let's imagine for these purposes that the warrant
 2 concerns only Sudesh Amman's room.
 3 **A. Okay.**
 4 Q. Talk us through in practical terms what the search
 5 process would look like?
 6 **A. So, it would be its own armed operation with its own**
 7 **command structure. A TFC would be appointed, an SFC**
 8 **would be appointed. The SFC would have to authorise**
 9 **that armed deployment. The intelligence would have to**
 10 **be fully analysed by the TFC, and the SFC would have to**
 11 **be briefed as to what was going to be required. A whole**
 12 **threat and risk assessment, much like this deployment.**
 13 **So it's a separate annex of this operation, if you like.**
 14 **We would have to satisfy ourselves, as the armed**
 15 **command, that the warrant was in existence. We would**
 16 **have to know that the subject was in the address or was**
 17 **-- there was some kind of control over them if they were**
 18 **away from the address.**
 19 **Then we would have to covertly, or overtly, as**
 20 **you've described it --**
 21 Q. It's an overt deployment.
 22 **A. We would have to wrap containment around the entire**
 23 **block of armed officers and then enter any communal area**
 24 **to take control of that area.**
 25 **The door would probably be forced, because we will**

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1 **want to do a limited entry containment and call-out.**
 2 **The reason we force the doors is so that we can gain**
 3 **visual control into the address to see where the subject**
 4 **is.**
 5 **We would then probably not go in. We would call any**
 6 **occupants out and safely detain them, probably in**
 7 **handcuffs. And only once we have control of the entire**
 8 **environment would we then allow detectives into the**
 9 **address to search for whatever it is that the warrant**
 10 **had been granted to search for. So, a significant**
 11 **undertaking clearly tipping our hand that we're**
 12 **interested in them as an individual.**
 13 Q. Let's assume that the possibility had been identified
 14 that Mr Amman had at least possibly hidden his fake IED
 15 belt in some communal area of the approved premises, in
 16 the garden or in the dining room or in one of the baths
 17 or in one of the activity rooms, and you've managed to
 18 persuade a court to give you a warrant to search the
 19 entire building. It houses, I think, 26 members.
 20 What, in practical terms, would that scenario
 21 involve?
 22 **A. Well, I mean that would be an even more significant**
 23 **undertaking and everybody would need to be called out,**
 24 **exactly as I've described, but the entire premises would**
 25 **need to be emptied. You'd need multiple teams to do**

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1 **that.**
 2 MR SHELDON: Yes, thank you, superintendent. Can I just
 3 finally ask you this --
 4 MR JUSTICE HILLIARD: Can I just ask, so far as you're
 5 concerned though, would any of that apply if the
 6 approved premises do their own searches every fortnight
 7 or whatever it is, that's presumably a matter for them
 8 to do or not do. They wouldn't need to get you involved
 9 if they're doing their routine search, would they?
 10 **A. Well, they wouldn't know necessarily that there's any**
 11 **kind of covert operation going on, so they would do what**
 12 **they normally do, I would imagine.**
 13 MR JUSTICE HILLIARD: Yes.
 14 MR SHELDON: Thank you, sir.
 15 Sorry, Superintendent McKibbin there was just one
 16 final point.
 17 Having reviewed this incident in some detail,
 18 I think, taking the trouble to do, to what extent do you
 19 consider that the armed officers involved in dealing
 20 with Mr Amman acted in accordance with their training?
 21 **A. I am in charge of organisational learning for all of our**
 22 **policing and there's always things to learn in every**
 23 **deployment. I have reviewed all the material in this**
 24 **case and I am immensely proud of the armed officers who**
 25 **deployed on this operation. They have responded**

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1 extremely quickly, less than a minute, and have chased
 2 down an armed subject who's already stabbed people and
 3 then attempted to stab them and threatened their life,
 4 armed with a Glock, which is a difficult weapon to fire.
 5 There's a moving target that's lunging at them and they
 6 have calmly responded to that threat and ultimately
 7 saved lives and quite a lot of lives. If those officers
 8 weren't there to do that, I think we would have been
 9 looking at a very different situation.
 10 So they've acted completely in accordance with their
 11 training. Policing is fiendishly difficult at the best
 12 of times, and we work in an environment where we are
 13 scrutinised extremely closely, and those officers have
 14 responded with the utmost bravery and I'm incredibly
 15 proud of them.
 16 MR SHELDON: Thank you very much.
 17 Further questions by MR HOUGH
 18 MR HOUGH: Mr McKibbin, just some questions from me arising
 19 out of some of your questions from Mr Sheldon.
 20 First of all, you were asked about the
 21 practicalities of stopping and arresting a subject who
 22 is under surveillance.
 23 **A. Yes.**
 24 **Q. You were given two extreme scenarios: somebody merely**
 25 **behaving in a slightly suspicious way and somebody who**

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1 grabs a knife and starts attacking members of the
 2 public.
 3 As you appreciate as a police officer, those making
 4 operational decisions are often confronted with
 5 something in between, a grey area?
 6 **A. Yes.**
 7 **Q. What I'd like to ask you about, because you've been**
 8 **given hypothetical scenarios, is to give you another**
 9 **one.**
 10 Suppose that a terrorist suspect under surveillance
 11 is known to have bought items and only a set of items
 12 which have been recommended by extremist publications
 13 for use in constructing a fake IED belt. Suppose that
 14 had been done very soon before. And suppose that,
 15 unlike in this situation, we're in the heat of summer
 16 and the person comes out of their address or approved
 17 premises wearing a bulky coat bulging around the middle
 18 in a very obvious way.
 19 Now, that's a threat. Suppose it's reported by the
 20 surveillance officers as an observation and heard by the
 21 TFC. The person's walking towards an area with many
 22 members of the public. Might that be a situation for
 23 a stop and arrest or search?
 24 **A. Okay. Regardless of the fact that somebody has**
 25 **purchased items that could make a fake suicide vest, the**

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1 intelligence is -- we always regard intelligence as
 2 potentially incomplete, so you only know the little bits
 3 that you know. There's a huge amount of information
 4 that you have to accept that you don't know, which is
 5 why we treat any firearm as real, we will treat any
 6 potential IED as real, because whilst you might have
 7 intelligence that somebody has acquired an imitation
 8 firearm or an imitation suicide vest, you don't know
 9 whether they have acquired anything that is real, so we
 10 will treat everything as real until we know otherwise,
 11 as I indicated earlier.
 12 So, having the scenario that you've just described
 13 would require the TFC and the SIO, the CTSIO, to have
 14 a conversation as to whether or not they felt that the
 15 evidential tipping point had been reached to make
 16 an interception that would amount in an arrest.
 17 You've got to be confident that when you stop the
 18 person, you are going to result in an arrest and then a
 19 reasonable chance of a successful prosecution that
 20 achieves sustained public protection. If you haven't
 21 got that confidence, however difficult that decision is,
 22 you might have to let the operation continue to run
 23 until you have it, and on that scenario --
 24 **Q. Let me just pause you there. You've given the answer**
 25 **you've given.**

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<p>1 A. Mm-hm.</p> <p>2 Q. If you are in the scenario which I outlined --</p> <p>3 A. Mm.</p> <p>4 Q. -- let me suggest to you that members of the public</p> <p>5 would find it alarming that officers might permit</p> <p>6 somebody, with real intelligence that they possess</p> <p>7 something that might well be a real IED, to walk towards</p> <p>8 a public area without being stopped because they could</p> <p>9 not be really confident of a successful prosecution.</p> <p>10 A. Well, see, I don't think I'd completely answered the</p> <p>11 question because what I was telling you was the process</p> <p>12 that the officers would go through in order to make the</p> <p>13 decision.</p> <p>14 So having described the process, the TFC would then</p> <p>15 ask the armed officers that are in the surveillance</p> <p>16 operation exactly what they could see, and it will be</p> <p>17 based on the description and that level of confidence</p> <p>18 about what they could see. And if the public are</p> <p>19 alarmed, based on what they can see, then obviously the</p> <p>20 armed officers would be alarmed about what they could</p> <p>21 see, and would be transmitting that back over the radio</p> <p>22 to the TFC who would be in a position to make the</p> <p>23 decision.</p> <p>24 So under those circumstances, if there's that level</p> <p>25 of clarity and they can clearly see the vest, which is</p> <p style="text-align: center;">Page 121</p>	<p>1 A. Yes, absolutely.</p> <p>2 Q. Next, overt searching. You've given a very clear answer</p> <p>3 about how there might be an overt search by police</p> <p>4 officers of somebody's room at an approved premises on</p> <p>5 the basis that they posed a threat or risk.</p> <p>6 We have heard that the approved premises we're</p> <p>7 dealing with had the power to search any resident's room</p> <p>8 at the drop of a hat and that searches were carried out</p> <p>9 routinely every couple of weeks or so.</p> <p>10 We've also heard that the Probation Service would</p> <p>11 have been quite prepared to carry out such a search and</p> <p>12 present it as a routine search if requested to do so by</p> <p>13 the police.</p> <p>14 We've also heard from the SIO that that certainly</p> <p>15 wouldn't -- that wouldn't be an operation beyond his</p> <p>16 counter. He wouldn't rule that out altogether.</p> <p>17 Do you have any experience of doing this sort of</p> <p>18 thing in your role? Have you, in your experience, had</p> <p>19 to deal with this sort of decision, whether to have</p> <p>20 approved premises staff carry out a search effectively</p> <p>21 for the benefit of an investigation?</p> <p>22 A. No, no, I haven't.</p> <p>23 Q. So since -- I appreciate it's a very, very unusual set</p> <p>24 of circumstances, this. But given that you haven't</p> <p>25 personally had experience of having to make that sort of</p> <p style="text-align: center;">Page 123</p>
<p>1 what you're alluding to -- perhaps that wasn't clear in</p> <p>2 the beginning of the question -- then of course there</p> <p>3 would be the ability to make the arrest or intervene.</p> <p>4 Q. What I was suggesting to you is it wasn't that the vest</p> <p>5 could be seen, but surely there may be situations where</p> <p>6 a subject demonstrates a risk which calls for</p> <p>7 an interception even though you can't be absolutely</p> <p>8 confident that you will get a charge and arrest and</p> <p>9 a prosecution at the end.</p> <p>10 A. It does, and those are the fiendishly difficult areas</p> <p>11 that CTSIOs and TFCs have to work within. They have to</p> <p>12 balance that threat and risk all the time. And as I've</p> <p>13 said, managing the risk is incredibly difficult to do.</p> <p>14 That's why it's such a difficult task.</p> <p>15 Q. Just to be clear, the TFC may sometimes have to make</p> <p>16 those decisions without the CTSIO's input if, as you</p> <p>17 indicated by your repeated qualifications and answers,</p> <p>18 there isn't the time --</p> <p>19 A. Exactly.</p> <p>20 Q. -- to call the SIO?</p> <p>21 A. Absolutely.</p> <p>22 Q. But does it also follow from all those questions that</p> <p>23 it's really important when a high-risk suspect is under</p> <p>24 surveillance with all this armed backup to have the TFC</p> <p>25 following the operation?</p> <p style="text-align: center;">Page 122</p>	<p>1 decision, are you in a position to tell us any</p> <p>2 particular criteria that would be set before doing so?</p> <p>3 A. Safety would be a clear criteria. I mean, it's</p> <p>4 an unusual scenario to get a third party to carry out</p> <p>5 a search on behalf of law enforcement authorities. That</p> <p>6 would be a very difficult decision to make. I would</p> <p>7 always prefer police to carry out that search function.</p> <p>8 Q. But if a CTSIO said that that was practically a sensible</p> <p>9 course to take to protect the public without blowing</p> <p>10 a surveillance operation, would you say, well, that's</p> <p>11 just still a completely daft idea?</p> <p>12 A. I wouldn't like to comment. It certainly wouldn't be my</p> <p>13 first choice.</p> <p>14 MR HOUGH: Thank you very much. Those are all my questions.</p> <p>15 MR JUSTICE HILLIARD: Thank you very much. Thank you.</p> <p>16 (The witness withdrew)</p> <p>17 MR HOUGH: There's one final piece of evidence, which is</p> <p>18 a statement to be read, the second statement of</p> <p>19 Jenny Louis. Mr Moss will read that.</p> <p>20 MR JUSTICE HILLIARD: Yes.</p> <p>21 This -- I think I have it somewhere -- this relates,</p> <p>22 doesn't it, just so the jury know what is coming, this</p> <p>23 relates to the question that was raised -- here we</p> <p>24 are -- about mental health assessments and so on so far</p> <p>25 as Mr Sudesh Amman was concerned; is that right?</p> <p style="text-align: center;">Page 124</p>

<p>1 MR MOSS: Sir, yes, that is right. If it would help, we 2 could have it on screen, it's INQ3676. Sir, of course 3 you and the jury will remember hearing the evidence of 4 Jenny Louis. 5 MR JUSTICE HILLIARD: Yes. 6 MR MOSS: This is a second statement. 7 JENNY LOUIS (statement read) 8 MR MOSS: She says as follows: 9 "This is my second statement made for the inquest 10 into the death of Sudesh Amman. Its purpose is to set 11 out the outcome of the inquiries made with staff at 12 HMP Belmarsh in relation to specific requests from the 13 Inquest Team which have arisen during the course of the 14 inquest hearing. The details set out below are the 15 product of inquiries made by and of staff at 16 HMP Belmarsh. I have not undertaken any of these 17 inquiries myself." 18 Then under the heading "Healthcare at HMP Belmarsh 19 and Sudesh Amman's medical records": 20 "As the inquest has already heard, her Majesty's 21 Prison Service does not provide the healthcare at 22 HMP Belmarsh nor elsewhere in the public prison estate. 23 The National Health Service has the statutory 24 responsibility for the provision of healthcare in the 25 prison estate. It will do so by commissioning</p> <p style="text-align: center;">Page 125</p>	<p>1 Sir, there's a document reference there, and that's 2 a document which we and which other lawyers in the case 3 have seen and have access to. I don't intend to put 4 them on screen because it is summarised in the 5 statement. 6 "On 4 August 2021, HMPPS received an email request 7 from the solicitor to the inquest to obtain and disclose 8 the health records for Mr Amman covering the period of 9 his time in prison, including remand, from 24 May 2018 10 to his release on 23 January 2020. HMPPS facilitated 11 this request by contacting the healthcare team at 12 HMP Belmarsh. Mr Amman's SystemOne records were 13 obtained on 5 August [of this year] and disclosed to the 14 Inquest Team on the same day." 15 Then under the heading "Sudesh Amman's contact with 16 the mental health team": 17 "I am not a healthcare professional and so will 18 avoid commenting on the entries made by medical staff in 19 the SystemOne records. It may assist the Inquest, 20 however, if I set out a chronology of Mr Amman's 21 relevant contact with healthcare. The references to 22 pages in brackets are to pages in SystemOne records. 23 "All prisoners sent to HMP Belmarsh will be seen by 24 a nurse and a GP on arrival. They will then be located 25 on our First Night Centre (FNC). We place prisoners</p> <p style="text-align: center;">Page 127</p>
<p>1 healthcare providers (including sometimes private 2 companies) to provide healthcare. Neither the prison, 3 HMPS nor the Ministry of Justice will be a party to any 4 contract between a healthcare provider and the NHS. 5 Those providing healthcare in a prison would therefore 6 be employed by an entity contracted by the NHS. 7 "Oxleas NHS Foundation Trust was the healthcare 8 provider at HMP Belmarsh at the time Sudesh Amman was 9 located at the prison. Oxleas is still the healthcare 10 provider. Their provision includes a mental health 11 team. 12 "Healthcare records within the prison estate are 13 held on an IT system called SystemOne. Because 14 prisoners have the same right to patient confidentiality 15 as they would have in the community, this is not an IT 16 system to which prison and probation staff have access 17 without the prisoner's consent. By contrast, healthcare 18 staff can make entries on the NOMIS system. While 19 healthcare staff can seek a prisoner's community health 20 records, confidentiality would similarly limit 21 non-healthcare staff from accessing those records. So, 22 for example, there are entities in NOMIS which record 23 Mr Amman's refusal to allow access to the autism 24 assessment conducted by Child and Adolescent Mental 25 Health Services (CAMHS)."</p> <p style="text-align: center;">Page 126</p>	<p>1 there because the first night in prison can be difficult 2 particularly for someone who has never been in prison 3 before. 4 "Sudesh Amman arrived at HMP Belmarsh on 5 25 May 2018. He was seen by a nurse for a health screen 6 (... at 20.08 hours). That entry includes references to 7 'Referral to a GP' and 'referral to mental health team'. 8 An entry by Dr Abdul Rahman ... records a plan to admit 9 Mr Amman to healthcare for observation in view of his 10 age, the nature of the charges against him and the risk 11 of deliberate self-harm although he denied any intention 12 to self-harm. Dr Rahman's diagnosis is given as 'First 13 time in prison'. 14 "Mr Amman was then admitted as an in-patient unit in 15 the healthcare unit. The relevant entry (... timed at 16 20.57) includes the detail that there had been 17 a 'Referral by establishment' for 'security reasons due 18 to his age' ... This indicates that HMPS staff in the 19 FNC had wanted Mr Amman placed in healthcare. 20 "Mr Amman remained in healthcare overnight. The 21 SystemOne records show he was seen on the following day 22 and note: 'Discussed admission to the healthcare with 23 Dr Salami. Noted primarily for security reasons, by the 24 governors, Dr Rahman's entry noted no healthcare reasons 25 to remain here. Suitable medically for the houseblock'</p> <p style="text-align: center;">Page 128</p>

<p>1 and further down 'no indication to suggest acute mental 2 health issues' (... [that's] timed at 9.20 [in the 3 morning]). Mr Amman was discharged from healthcare on 4 26 May 2018 ... 5 "On 29 May 2018, Mr Amman was seen by a member of 6 the mental health in-reach team. He was seen by Nurse 7 Joel Charles who has made entries into the SystemOne 8 record on 29 May and 30 May 2018. The entry on 9 29 May 2018 included: 'To be discussed in MDT Referrals 10 Meeting' ... I understand the reference to MDT to be to 11 multi-disciplinary team. 12 "Mr Charles' entry on 30 May 2018 is longer and 13 concludes under 'Plan': 14 "We have mutually agreed that at present MHIRT will 15 have no further input but that he can re refer himself 16 should he feel that his circumstances have changed. We 17 discussed support options available within the prison, 18 Listener, Samaritans Phone, Wing officers, also to 19 engage with prison activities'. 20 "The entry also records that Mr Amman was to be 21 discussed at MDT Referral Meetings ... 22 "Amy Royston, the current manager of the mental 23 health team (previously known as MHIRT) has confirmed 24 that an entry in SystemOne dated 5 June 2018 refers to 25 a discussion of Mr Amman at the team's referrals meeting</p> <p style="text-align: center;">Page 129</p>	<p>1 Mental health referrals meeting with an indication of 2 potential autism or Asperger syndrome - Mr Faraz scored 3 zero on a reception LDSQ. We completed an extended 4 LDSQ, an AQ-10 autism quotient, interview, and I have 5 reviewed available clinical notes, and there is nil 6 evidence of any learning disability or difficulty - 7 Mr Faraz scored 3 on the AQ-10, with 6 or more 8 indicating further assessment." 9 MR JUSTICE HILLIARD: Just pausing there. A 3 would mean no 10 need for further assessment, does it? 11 MR MOSS: Well below the threshold of 6, is my 12 understanding. 13 MR JUSTICE HILLIARD: Yes. 14 MR MOSS: "As to actions, Mr Hawkins recorded: '1. Feedback 15 to referral source. 2. No further LDD action.' 16 "Mr Amman was located on the High Secure Unit 17 between 12 October 2018 and 18 March 2019. A nurse 18 attends the HSU daily to assess the physical and mental 19 wellbeing of prisoners located there. Entries in the 20 SystemOne records show that nurses at HMP Belmarsh 21 regularly assessed Mr Amman while he was on the HSU ... 22 None of these nurses made a referral to the mental 23 health team - something which they can do. In addition, 24 a nurse from the mental health team attends on the HSU 25 on every Wednesday to see any prisoner who may want</p> <p style="text-align: center;">Page 131</p>
<p>1 with the outcome that he was to see a psychiatrist. 2 "On 26 June 2018, Mr Amman was seen by Dr Faisal 3 Mudathikundan, a psychiatrist. His assessment is set 4 out in the SystemOne records ... and concludes: 5 "IMP 18-year-old cat A prisoner, first time in 6 prison charged with terrorism [sic] offences. His 7 affect appears rather incongruent considering his 8 situation and some answers were concrete. Reports 9 having no friends at school and appears to have some 10 difficulty understanding how others feel. Likes to keep 11 himself to himself and he appears happy with this. I am 12 not clear at this stage whether this is a coping 13 strategy or due to a developmental disorder. Asked what 14 can the MHT do to help him and he said he is not 'mad'. 15 Explained we can help with stress, low mood ... and he 16 said if he needs help he will let us know.' 17 "The entry concludes that Mr Amman was to be 18 discussed in the mental health team's referrals meeting 19 regarding the future support ... Mr Amman was then 20 referred to the learning disability and difficulty (LDD) 21 clinic by Dr Mudathikundan and the referrals meeting. 22 "An entry dated 23 July 2018 made by Anthony Hawkins 23 records: 24 "Mr Faraz was seen in learning disability and 25 difficulty clinic following a referral via Dr Faisal and</p> <p style="text-align: center;">Page 130</p>	<p>1 assistance in relation to mental health issues. 2 "Mr Amman was also located in the segregation unit 3 between 3 January 2020 and his release on 23 January. 4 It is a requirement that a prisoner located in the 5 segregation unit be assessed as medically fit (both in 6 the physical and mental sense) to be segregated. The 7 SystemOne records show that during his time on the 8 segregation unit in January 2020, Mr Amman was seen by 9 a nurse ... With one exception, none of those assessing 10 Mr Amman made a referral to the mental health team. The 11 exception is the entry on 17 January 2020. There is no 12 further information as to why this entry was made." 13 Then the heading "Further requests raised by the 14 Inquest Team": 15 "On 6 January 2021, and following the disclosure of 16 the SystemOne records, the Inquest Team asked for 17 further information in relation to four matters. 18 "The first of these was a request for any other 19 records relating to mental healthcare of or learning 20 disability work with Sudesh Amman whilst at 21 HMP Belmarsh. Inquiries with the healthcare team have 22 confirmed that all relevant healthcare records have now 23 been provided. 24 "The second was whether any further support was 25 provided to Mr Amman after he was seen by</p> <p style="text-align: center;">Page 132</p>

<p>1 Dr Mudathikundan on 26 June 2018. Amy Royston has 2 confirmed that the subsequent support was that provided 3 by Mr Hawkins in the LDD clinic with the outcome that 4 there was no further support from the LDD clinic. 5 "The third request related to the adjudication 6 hearing on 4 September 2018. The governor who conducted 7 that adjudication is Gavin Davies, who remains at 8 HMP Belmarsh. He remembers Mr Amman but prior to 9 recently reading the adjudication paperwork, did not 10 have a recollection of this adjudication. It is 11 Mr Davies' practice when matters crop up during 12 an adjudication where he can assist a prisoner by 13 referring them appropriately then he will do so after 14 the hearing and always by telephone. Mr Davies is 15 confident that on this occasion he would have rung the 16 mental health team after the adjudication to refer 17 Mr Amman to them. 18 "Amy Royston has confirmed that the SystemOne 19 records do not refer to a mental health referral being 20 received in September 2018. Her expectation is that 21 a referral would be recorded on SystemOne. Her checks 22 have included searching the generic email inbox used by 23 her team albeit Mr Davies' recollection is that he would 24 use the telephone. Ms Royston has also explained that 25 the matter may have been discussed with the previous</p> <p style="text-align: center;">Page 133</p>	<p>1 break off now until 10.00 Monday morning. All right? 2 Thank you very much. 3 (3.38 pm) 4 (In the absence of the jury - extracted) 5 (3.45 pm) 6 (The hearing adjourned until 7 Monday, 16 August 2021 at 10.00 am) 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 135</p>
<p>1 manager of the mental health team. The inquiries made 2 by HMPPS in relation to this request have not produced 3 any further information. 4 "[Finally], the fourth request related to whether 5 there had been a mental health referral following the 6 maturity assessment of February 2019 conducted by 7 Prina Patel. I understand that Prina Patel has 8 explained that this maturity assessment would have been 9 discussed at Pathfinder meetings, which would have been 10 attended by healthcare. Amy Royston has not found 11 an entry in the SystemOne records or in the generic 12 inbox which shows a referral made around February 2019. 13 Such a referral might have gone directly to the previous 14 manager of the mental health team. Ms Royston's 15 expectation is that any referral would be recorded on 16 SystemOne. Once again, HMPPS enquiries have revealed no 17 further information." 18 There follows a signature and a statement of truth. 19 MR JUSTICE HILLIARD: Thank you very much. 20 MR HOUGH: Sir, that's all the evidence we have for today 21 and for this week. There will be one witness on Monday, 22 and we anticipate and understand that will be the end of 23 the evidence. 24 MR JUSTICE HILLIARD: Yes all right. Thank you very much. 25 So, members of the jury, that's it for today and we'll</p> <p style="text-align: center;">Page 134</p>	<p>1 I N D E X 2 3 DR ASHLEY FEGAN-EARL (sworn)1 4 Questions by MR HOUGH1 5 MS BARBARA WALLACE (sworn)22 6 Questions by MR HOUGH22 7 8 MR TIMOTHY HUDSON (affirmed)33 9 Questions by MR MOSS33 10 SLAWOMIR KUDLA (sworn)45 11 Questions by MR HOUGH45 12 13 OMOLARA OCHEI (sworn)53 14 Questions by MR MOSS53 15 ROSS MCKIBBIN (affirmed)66 16 QUESTIONS BY MR HOUGH67 17 Questions by MR SHELDON106 18 Further questions by MR HOUGH118 19 20 JENNY LOUIS (statement read)125 21 22 23 24 25</p> <p style="text-align: center;">Page 136</p>

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