

<p>1 Thursday, 24 June 2021</p> <p>2 (10.00 am)</p> <p>3 THE CHAIRMAN: Good morning, everybody.</p> <p>4 MS BLACKWELL: Good morning, sir.</p> <p>5 The gentleman in the witness box is Neil Williams.</p> <p>6 Can he be sworn, please?</p> <p>7 MR NEIL WILLIAMS (sworn)</p> <p>8 Questions from MS BLACKWELL</p> <p>9 <b>A. Neil Williams, retired police officer.</b></p> <p>10 THE CHAIRMAN: Thank you.</p> <p>11 MS BLACKWELL: Is your full name Neil Williams?</p> <p>12 <b>A. It is, yes.</b></p> <p>13 Q. When you retired from the Metropolitan Police Service,</p> <p>14 did you hold the rank of detective chief inspector?</p> <p>15 <b>A. I did, yes.</b></p> <p>16 Q. I would like to ask you first of all, please, about your</p> <p>17 training and experience, then some questions about your</p> <p>18 involvement with Operation Utara and the development of</p> <p>19 Operation Ankaa. We will take those matters in</p> <p>20 chronological order, as much as we can.</p> <p>21 Let's begin, please, by dealing with your experience</p> <p>22 and training and you have assisted the inquiry by</p> <p>23 providing several witness statements and you had already</p> <p>24 in fact provided witness statements for the purpose of</p> <p>25 the IPCC investigation?</p> <p style="text-align: center;">Page 1</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. You had been a tactical firearms commander, also known</p> <p>3 as a silver firearms commander, since September 2005, is</p> <p>4 that right?</p> <p>5 <b>A. That's correct, yes.</b></p> <p>6 Q. Since April 2007, you had performed that role numerous</p> <p>7 times, both for the central task force and the Flying</p> <p>8 Squad?</p> <p>9 <b>A. That's correct, yes.</b></p> <p>10 Q. They are separate units within the organised crime</p> <p>11 command, also known as SCO7?</p> <p>12 <b>A. That's correct.</b></p> <p>13 Q. During your employment in that regard, how many</p> <p>14 operations, roughly, did you act as tactical firearms</p> <p>15 commander for?</p> <p>16 <b>A. I remember in 2014, as part of a re-creditation</b></p> <p>17 <b>process, that I had done around 140 and obviously I did</b></p> <p>18 <b>quite a lot between -- I think that was May 2014 and</b></p> <p>19 <b>when I retired, in central task force and other units in</b></p> <p>20 <b>SCO7, so somewhere between 150 and 200 I think would be</b></p> <p>21 <b>a fair estimate. I don't know the definitive figure.</b></p> <p>22 Q. Over a 10-year period?</p> <p>23 <b>A. That's correct, yes.</b></p> <p>24 Q. You had also successfully completed the strategic</p> <p>25 firearms commander course?</p> <p style="text-align: center;">Page 2</p>
<p>1 <b>A. Yes, I took that as a career development programme.</b></p> <p>2 Q. I think we know from the certificate which has been</p> <p>3 provided that you scored 100 per cent?</p> <p>4 <b>A. Yes, that was on -- you have to do an online test before</b></p> <p>5 <b>you actually do the course, and I think that</b></p> <p>6 <b>100 per cent was the online test, obviously the course</b></p> <p>7 <b>itself is a practical assessment.</b></p> <p>8 Q. In addition to that, you have completed the strategic</p> <p>9 firearms gold command course?</p> <p>10 <b>A. I think that is one and the same.</b></p> <p>11 Q. Is it?</p> <p>12 <b>A. That is probably the second part -- the second part, the</b></p> <p>13 <b>first one is the online and then the second part is</b></p> <p>14 <b>the ...</b></p> <p>15 Q. So those two parts together --</p> <p>16 <b>A. That's correct, yes.</b></p> <p>17 Q. -- amount to the qualification?</p> <p>18 <b>A. That's correct, yes.</b></p> <p>19 Q. Had you ever acted as a strategic firearms commander?</p> <p>20 <b>A. No, I was not operationally accredited.</b></p> <p>21 Q. Right.</p> <p>22 <b>A. That was, as I say, a career development opportunity</b></p> <p>23 <b>that I took at the time.</b></p> <p>24 Q. In order to perform that role, you would have had to</p> <p>25 have shadowed for a period of time?</p> <p style="text-align: center;">Page 3</p>	<p>1 <b>A. I would have had to shadow a period of time, yes, which</b></p> <p>2 <b>didn't materialise and I think at the time I took the</b></p> <p>3 <b>course, there were potentially some resilience issues</b></p> <p>4 <b>within the command and they were looking for additional</b></p> <p>5 <b>people and obviously that was an opportunity I took, but</b></p> <p>6 <b>it didn't materialise practically on the ground.</b></p> <p>7 Q. Understood, thank you.</p> <p>8 You became involved as we know with Operation Utara,</p> <p>9 which the inquiry has heard was an operation into</p> <p>10 organised crime groups predominantly of Turkish descent?</p> <p>11 <b>A. That's correct, yes.</b></p> <p>12 Q. When you provided your first witness statement to the</p> <p>13 IPCC on 16 December 2015, you indicated this, that you</p> <p>14 were independent from the investigation known as</p> <p>15 Operation Ankaa, which had its own separate senior</p> <p>16 investigating officer, DI Rob Murray, from whom the</p> <p>17 inquiry has heard, and case officers DC Gary Kinch and</p> <p>18 other officers as well.</p> <p>19 I would like you to explain, please, how you saw</p> <p>20 your role in relation to operations Utara and Ankaa, and</p> <p>21 how you describe yourself as being independent of those</p> <p>22 operations.</p> <p>23 <b>A. Yes, well perhaps it might be worth just explaining the</b></p> <p>24 <b>structure of the central task force as it was.</b></p> <p>25 Q. I am sure that would help.</p> <p style="text-align: center;">Page 4</p>

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<p>1 <b>A. Obviously when I first went there, we had three teams.</b></p> <p>2 <b>That then got reduced to two teams, each led by</b></p> <p>3 <b>a detective inspector. With two to three sergeants and</b></p> <p>4 <b>then up to a dozen or so detective constables underneath</b></p> <p>5 <b>them.</b></p> <p>6 <b>They ran their own operations, so each team would</b></p> <p>7 <b>typically have three maybe live operations, with</b></p> <p>8 <b>a number in the development stage.</b></p> <p>9 <b>The SIOs for those operations were the respective</b></p> <p>10 <b>DIs, so Mr Murray was the SIO for Operation Utara. My</b></p> <p>11 <b>role as the DCI was, effectively, the commander of that</b></p> <p>12 <b>branch.</b></p> <p>13 Q. So you were his line manager?</p> <p>14 <b>A. I was his line manager, yes.</b></p> <p>15 Q. Sitting above you was Detective Superintendent Gilmour?</p> <p>16 <b>A. That's correct.</b></p> <p>17 <b>Yes. I am just trying to think when he actually</b></p> <p>18 <b>came -- he may not have been at the start but certainly</b></p> <p>19 <b>at the time of Ankaa he was my line manager, yes.</b></p> <p>20 Q. Yes, right.</p> <p>21 So what you have described is a part of the</p> <p>22 organisation in which Mr Murray, yourself and Mr Gilmour</p> <p>23 sat in the same area of command, is that right?</p> <p>24 <b>A. That was the line management structure for the central</b></p> <p>25 <b>task force, yes.</b></p> <p style="text-align: center;">Page 5</p>	<p>1 Q. Right, so how does that allow you to describe yourself</p> <p>2 as being independent from the operation?</p> <p>3 <b>A. Well, my role sat outside the operational day-to-day</b></p> <p>4 <b>running.</b></p> <p>5 Q. Right.</p> <p>6 <b>A. The DCI -- particularly I was keen to enforce that,</b></p> <p>7 <b>having been a DI and an SIO myself, it was to remain</b></p> <p>8 <b>independent from their day-to-day running of the</b></p> <p>9 <b>operations.</b></p> <p>10 <b>My role was managing the resources of the office.</b></p> <p>11 <b>I got involved in other strategic projects, in relation</b></p> <p>12 <b>to other emerging crime, separate from their day-to-day</b></p> <p>13 <b>operations, staffing, budgets, resources, fleet,</b></p> <p>14 <b>training, that sort of thing, was my day-to-day,</b></p> <p>15 <b>attending management meetings at the centre. And the</b></p> <p>16 <b>way I ran the branch was really to try and deflect any</b></p> <p>17 <b>of that administrative side, very important, obviously,</b></p> <p>18 <b>away from the two DIs at the time of Operation Ankaa, to</b></p> <p>19 <b>let them do what they did best, which was to run the</b></p> <p>20 <b>operations.</b></p> <p>21 Q. Right.</p> <p>22 During the course of Operation Utara, were there</p> <p>23 many occasions upon which it was necessary to organise</p> <p>24 an armed deployment?</p> <p>25 <b>A. Yes, there were, yes.</b></p> <p style="text-align: center;">Page 6</p>
<p>1 Q. Would you describe yourself as being the go-to tactical</p> <p>2 firearms commander for those operations?</p> <p>3 <b>A. If I was available, then I would be the TFC for</b></p> <p>4 <b>Operation Utara, Rob as the SIO could not perform that</b></p> <p>5 <b>function and the other DI at the time of Operation</b></p> <p>6 <b>Ankaa, Detective Inspector Cailles, she was not</b></p> <p>7 <b>operationally accredited as a TFC. If she was</b></p> <p>8 <b>operationally accredited then she would perform that if</b></p> <p>9 <b>she was available.</b></p> <p>10 Q. Right. Are you able to assess in relation to Operation</p> <p>11 Utara on how many occasions you acted as TFC?</p> <p>12 <b>A. I couldn't assess, as I say -- I did a number of</b></p> <p>13 <b>deployments when I was at the central task force on</b></p> <p>14 <b>Utara and other operations, but I couldn't be specific.</b></p> <p>15 <b>It was more than a few. More than a few.</b></p> <p>16 Q. Right.</p> <p>17 I would like us to look, please, at the role of the</p> <p>18 TFC and it may assist us to have up on screen, please,</p> <p>19 Mr Coates, COP 24 at page 3.</p> <p>20 You will be familiar, Mr Williams, with the APP for</p> <p>21 armed policing?</p> <p>22 <b>A. I do have familiarity with it, yes.</b></p> <p>23 Q. All right.</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. This comes from that and we can see that there is</p> <p style="text-align: center;">Page 7</p>	<p>1 a description here of the formal command structures</p> <p>2 being gold, silver and bronze, strategic, tactical and</p> <p>3 operational.</p> <p>4 We can see here:</p> <p>5 "The strategic firearms commander determines the</p> <p>6 strategic objectives and sets any tactical parameters,</p> <p>7 retains strategic oversight and overall command and</p> <p>8 responsibility.</p> <p>9 "The tactical firearms commander develops, commands</p> <p>10 and coordinates the overall tactical response in</p> <p>11 accordance with the strategic objectives.</p> <p>12 "The operational firearms commander commands a group</p> <p>13 of officers carrying out functions or territorial</p> <p>14 responsibilities related to a tactical plan."</p> <p>15 Were you familiar with the delineation between those</p> <p>16 three levels of firearms command?</p> <p>17 <b>A. Yes, I was.</b></p> <p>18 Q. Let us look, please, at how that is reflected in the MPS</p> <p>19 SOP.</p> <p>20 Mr Coates, could we replace that, please, with</p> <p>21 IPCC79, at page 24.</p> <p>22 Can we go to the previous page, please. Thank you.</p> <p>23 We can see at the bottom of that page, at</p> <p>24 paragraph 6.4, a direct replication of what appears in</p> <p>25 the APP AP. Now can we go over to the next page,</p> <p style="text-align: center;">Page 8</p>

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<p>1 please.</p> <p>2 The paragraph at the top of that page, 6.5 is also</p> <p>3 replicated from the APP AP. I would like us to look at</p> <p>4 paragraph 6.6:</p> <p>5 "In a complex multi-seated or cross-boundary</p> <p>6 operation, where the gold and silver commander for the</p> <p>7 entire operation are coordinating and directing the</p> <p>8 deployment of different police disciplines or other</p> <p>9 agencies, it may be appropriate for the firearms element</p> <p>10 of the operation to be commanded by a commander who is</p> <p>11 working to the gold and silver commanders for the</p> <p>12 overall operation.</p> <p>13 "The command structure offers flexibility in</p> <p>14 response to a varied and developing range of</p> <p>15 circumstances and is functional and not based on rank.</p> <p>16 The structure must be clearly articulated to all those</p> <p>17 involved in the operation. Where time permits and it is</p> <p>18 appropriate to do so, briefing notes or flowcharts</p> <p>19 showing the structure can greatly aid people's</p> <p>20 understanding of it."</p> <p>21 Just pausing there, throughout the course of your</p> <p>22 involvement in Utera and then Ankaa, were you ever aware</p> <p>23 of there being briefing notes or flowcharts showing the</p> <p>24 structure that was involved in either of those</p> <p>25 operations?</p> <p style="text-align: center;">Page 9</p>	<p>1 <b>A. Certainly on the FA forms the command structure is</b></p> <p>2 <b>designated, but other than that I am unaware of any.</b></p> <p>3 Q. All right.</p> <p>4 Did you ever have any concern that there was</p> <p>5 a blurring of lines between Mr Murray's role as SIO of</p> <p>6 the operation and your role as tactical firearms</p> <p>7 commander?</p> <p>8 <b>A. None whatsoever. I wasn't the SIO and I wasn't involved</b></p> <p>9 <b>in the operation.</b></p> <p>10 Q. Did your role as Mr Murray's line manager ever cause you</p> <p>11 concern that there would be a blurring of those lines?</p> <p>12 <b>A. None whatsoever.</b></p> <p>13 Q. All right.</p> <p>14 I would like to look, please, at approach to threat</p> <p>15 assessment. Can we put up, please, Mr Coates, COP18, at</p> <p>16 page 6.</p> <p>17 Again, this comes from the APP AP, armed deployment.</p> <p>18 I want to look at the threat assessment definition:</p> <p>19 "A threat assessment refers to the analysis of</p> <p>20 potential or actual harm to people, the probability of</p> <p>21 it occurring and the consequences or impact should it</p> <p>22 occur. It is based on fact, information and</p> <p>23 intelligence and will vary over time. A threat</p> <p>24 assessment is used to develop a prioritised working</p> <p>25 strategy and ultimately forms the basis on which the</p> <p style="text-align: center;">Page 10</p>
<p>1 proportionality of the police response will be judged."</p> <p>2 Is that statement familiar to you?</p> <p>3 <b>A. Yes, it is.</b></p> <p>4 Q. As tactical firearms commander, was it your</p> <p>5 responsibility to make a threat assessment and to</p> <p>6 continue to do that throughout the course of</p> <p>7 an operation?</p> <p>8 <b>A. Yes, it was.</b></p> <p>9 Q. I will read on:</p> <p>10 "A threat assessment should be based on information</p> <p>11 known at the time and may be supported by historic</p> <p>12 information, it should take account of the nature of any</p> <p>13 threat anticipated and its proximity, should identify to</p> <p>14 whom and under what circumstances the threat may occur,</p> <p>15 should describe any consequences or impacts, should take</p> <p>16 account of the impact of change and may take the form of</p> <p>17 an analytical report or problem or subject profile.</p> <p>18 "Where possible, threat assessments should be time</p> <p>19 specific so that actions can be prioritised accordingly.</p> <p>20 It is important to evaluate how police action or</p> <p>21 inaction may impact on the threat assessment."</p> <p>22 Were you conscious, Mr Williams, when you carried</p> <p>23 out the role of TFC, that although a threat assessment</p> <p>24 may have been undertaken at the beginning of</p> <p>25 an operation, the level at which the threat was assessed</p> <p style="text-align: center;">Page 11</p>	<p>1 may alter as the operation progressed?</p> <p>2 <b>A. Yes, I was aware of that.</b></p> <p>3 Q. Was it your practice throughout the course of</p> <p>4 an operation to continuously be aware that the threat</p> <p>5 that was apparent may rise?</p> <p>6 <b>A. Yes, you were always aware of that. You have that</b></p> <p>7 <b>constantly in your mind throughout.</b></p> <p>8 Q. May we look at COP18, the same document, but go to</p> <p>9 page 10, please, Mr Coates.</p> <p>10 Part 7 is headed "Decisive action":</p> <p>11 "To take decisive action is to intervene, intercept</p> <p>12 or challenge a subject. Decisive action can be applied</p> <p>13 to a subject who is in the open, in a vehicle or in</p> <p>14 a building or other structure. This may be undertaken</p> <p>15 in a slow and deliberate manner, or in fast time and</p> <p>16 with the benefit of surprise. Consideration of the ways</p> <p>17 in which a particular situation can be resolved with the</p> <p>18 least risk of harm allows for feasible specific tactics</p> <p>19 to be identified. There are specific firearms tactics</p> <p>20 related to this option (tactics can be described as</p> <p>21 a method of working using agreed processes to meet</p> <p>22 specific objectives)."</p> <p>23 As tactical firearms commander, did you understand</p> <p>24 that it was your role to assess and implement decisive</p> <p>25 action?</p> <p style="text-align: center;">Page 12</p>

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<p>1 <b>A. Yes.</b></p> <p>2 Q. And was it your understanding that, when you made those</p> <p>3 decisions, you always had in mind that a situation</p> <p>4 needed to be resolved with the least risk of harm?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. I have touched upon the separation of roles, and you</p> <p>7 have indicated to the inquiry that in your view, you</p> <p>8 were content that there was a separation of roles,</p> <p>9 particularly between yourself and Mr Murray?</p> <p>10 <b>A. Yes, that's correct.</b></p> <p>11 Q. Why would that be important in an operation?</p> <p>12 <b>A. Well the whole ethos around separation of roles dates</b></p> <p>13 <b>back probably the best part of two decades now,</b></p> <p>14 <b>highlighted sadly in other cases, such as this,</b></p> <p>15 <b>primarily the Azelle Rodney case.</b></p> <p>16 <b>And perception that officers, without that</b></p> <p>17 <b>separation of roles, particularly as I think it was</b></p> <p>18 <b>a silver in those days and now tactical firearms</b></p> <p>19 <b>commander, may not conduct necessarily a balanced risk</b></p> <p>20 <b>assessment in terms of the tactics against the</b></p> <p>21 <b>operational objectives. So, for example, he may, or the</b></p> <p>22 <b>perception may be, that he may delay the decision to</b></p> <p>23 <b>arrest, waiting for further evidence to come and that</b></p> <p>24 <b>would be detrimental to the overall safety of everyone</b></p> <p>25 <b>involved in the operation and specifically the subjects.</b></p> <p style="text-align: center;">Page 13</p>	<p>1 <b>I think that was the ethos of the separation of</b></p> <p>2 <b>roles and certainly from my training, from 2008, as</b></p> <p>3 <b>a tactical firearms commander, obviously that designated</b></p> <p>4 <b>separation of roles has been hammered home.</b></p> <p>5 Q. Thank you.</p> <p>6 I am going to move on now to ask you some questions</p> <p>7 about the arrest of Izzet Eren and Erwin Amoyaw-Gyamfi</p> <p>8 on 13 October 2015.</p> <p>9 Was this a spontaneous armed operation?</p> <p>10 <b>A. Yes, it was.</b></p> <p>11 Q. Can you explain to the inquiry, please, how you became</p> <p>12 aware of the fact that Izzet Eren and</p> <p>13 Erwin Amoyaw-Gyamfi were armed and riding on</p> <p>14 a motorcycle throughout an area of London?</p> <p>15 <b>A. Well, first and foremost, we didn't know their identity.</b></p> <p>16 Q. Right.</p> <p>17 <b>A. We only knew their identity once they had been arrested.</b></p> <p>18 <b>So the operation was a spontaneous response to</b></p> <p>19 <b>intelligence that was passed to me by DC Kinch, as he</b></p> <p>20 <b>was then, that there was going to be an exchange,</b></p> <p>21 <b>believed firearms, imminently. Although we didn't have</b></p> <p>22 <b>a specific time, the intelligence suggested that it was</b></p> <p>23 <b>going to be fairly imminent that evening.</b></p> <p>24 Q. That information came to you from Mr Kinch?</p> <p>25 <b>A. That's correct, yes.</b></p> <p style="text-align: center;">Page 14</p>
<p>1 Q. On 13 October?</p> <p>2 <b>A. On 13 October.</b></p> <p>3 Q. And so how were you selected as tactical firearms</p> <p>4 commander for that spontaneous operation?</p> <p>5 <b>A. Well, first -- in a similar way, obviously, I performed</b></p> <p>6 <b>that role for Operation Utara, he couldn't go to</b></p> <p>7 <b>Mr Murray, because he couldn't perform the role, so he</b></p> <p>8 <b>contacted me.</b></p> <p>9 Q. Was Mr Murray trained as a tactical firearms commander?</p> <p>10 <b>A. Yes, he was and he was a very experienced tactical</b></p> <p>11 <b>firearms commander, probably as much experience as</b></p> <p>12 <b>I had. But he couldn't perform the role.</b></p> <p>13 Q. He couldn't perform the role because he was SIO of the</p> <p>14 investigation?</p> <p>15 <b>A. That's correct, yes. That's correct.</b></p> <p>16 Q. So Mr Kinch came to you. Because it was a spontaneous</p> <p>17 operation, is it right that the firearms authorisation</p> <p>18 forms that we know were completed for the operation on</p> <p>19 8 December and the operation on 11 December were not</p> <p>20 completed on this occasion?</p> <p>21 <b>A. No, that's correct.</b></p> <p>22 Q. In fact, a spontaneous deployment is one of the</p> <p>23 exceptions to those forms having to be completed?</p> <p>24 <b>A. That's correct.</b></p> <p>25 Q. For obvious reasons.</p> <p style="text-align: center;">Page 15</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. Let's look, please at document FEO22 at page 36.</p> <p>3 Sir, we have a hard copy of this in our additional</p> <p>4 bundle at page 70.</p> <p>5 THE CHAIRMAN: Thank you.</p> <p>6 MS BLACKWELL: This is the CRIS report for the arrest of the</p> <p>7 two individuals.</p> <p>8 We can see here that according to the information on</p> <p>9 this page, they attempted to run off:</p> <p>10 "Suspect 2 dropping a machine pistol as he ran.</p> <p>11 Suspect 2 was detained [I think that should be 'across']</p> <p>12 Stamford Hill and suspect 1 detained by Belfast Road,</p> <p>13 N16 with a bag that contained a self-loading pistol that</p> <p>14 was loaded, with a round in the chamber, the safety was</p> <p>15 off and the hammer was cocked."</p> <p>16 Then they were arrested.</p> <p>17 Where were you at the time of the arrest of these</p> <p>18 two men?</p> <p>19 <b>A. I was in the third armed response vehicle, uniformed</b></p> <p>20 <b>armed response vehicle, because of the spontaneous</b></p> <p>21 <b>nature of the operation we had to use armed response</b></p> <p>22 <b>vehicle assets and I was in the third. We had three</b></p> <p>23 <b>ARVs and I was in the third with my tactical adviser.</b></p> <p>24 <b>So I was very close, and as soon as they were</b></p> <p>25 <b>detained, I was out of the car and on the pavement.</b></p> <p style="text-align: center;">Page 16</p>

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<p>1 Q. So you were involved in their arrest?</p> <p>2 <b>A. I was involved. I was the tactical firearms commander,</b></p> <p>3 <b>yes.</b></p> <p>4 Q. Right. And so can you confirm that one of the weapons</p> <p>5 was discarded at the scene, but I think it was Mr Eren</p> <p>6 that had the other loaded firearm in his man bag when he</p> <p>7 was arrested?</p> <p>8 <b>A. That is my recollection, yes.</b></p> <p>9 Q. Thank you.</p> <p>10 Can we take that off the screen, please, and replace</p> <p>11 it with IPC384.</p> <p>12 Thank you.</p> <p>13 Are these your notes?</p> <p>14 <b>A. That's correct, they are my handwritten notes from that</b></p> <p>15 <b>night.</b></p> <p>16 Q. When did you make them?</p> <p>17 <b>A. On the night, contemporaneously. To the best of my</b></p> <p>18 <b>knowledge.</b></p> <p>19 Q. You didn't make them whilst you were out on the street?</p> <p>20 <b>A. I wrote most of these in the -- either in the car park</b></p> <p>21 <b>at Quicksilver or in the back of the ARV.</b></p> <p>22 Q. Right.</p> <p>23 <b>A. I may have started the first part whilst I was still in</b></p> <p>24 <b>the office at Barking, having been informed what was</b></p> <p>25 <b>going on by DC Kinch.</b></p> <p style="text-align: center;">Page 17</p>	<p>1 Q. Are the numbers down the left-hand column the times --</p> <p>2 <b>A. The times, yes.</b></p> <p>3 Q. -- that the notes were made?</p> <p>4 <b>A. No, times that I had a recollection -- so 18.21,</b></p> <p>5 <b>probably refers to the time of the incoming call from</b></p> <p>6 <b>Mr Kinch.</b></p> <p>7 Q. Right, okay, so they are the times that the incidents</p> <p>8 about which you are making a note happened, not the time</p> <p>9 that the notes are made?</p> <p>10 <b>A. That's correct, yes.</b></p> <p>11 Q. Could we read through those, please, together</p> <p>12 Mr Williams, could you start from the top of that page?</p> <p>13 <b>A. So 18.21:</b></p> <p>14 <b>"Whilst still in the office I received a telephone</b></p> <p>15 <b>call from DC Kinch. He informed me that intelligence</b></p> <p>16 <b>suggested that the commodity we believed was exchanged</b></p> <p>17 <b>yesterday evening at the end of Craven Park Road was</b></p> <p>18 <b>firearms, which had been returned to the location from</b></p> <p>19 <b>which they were collected. This, however, was temporary</b></p> <p>20 <b>and would be taken back in a few hours. Intelligence</b></p> <p>21 <b>suggested that a similar method of exchange would take</b></p> <p>22 <b>place at the same area. There is no intelligence to</b></p> <p>23 <b>suggest who the parties are or any precise timings. No</b></p> <p>24 <b>intelligence re any threat or purpose of these</b></p> <p>25 <b>firearms."</b></p> <p style="text-align: center;">Page 18</p>
<p>1 <b>I have then written "NDM applied", national decision</b></p> <p>2 <b>model, and I have made a note that the criteria for the</b></p> <p>3 <b>deployment of firearms:</b></p> <p>4 <b>"Criteria for the deployment has been met re</b></p> <p>5 <b>firearms."</b></p> <p>6 Q. Sorry to interrupt you, I just want to ask you about the</p> <p>7 NDM. We have looked at that throughout the course of</p> <p>8 this inquiry once or twice, that is the national</p> <p>9 decision model, isn't it?</p> <p>10 <b>A. That's correct, yes.</b></p> <p>11 Q. It is the model to be used by anybody making a decision</p> <p>12 of this nature in order to ensure that the correct</p> <p>13 criteria are considered?</p> <p>14 <b>A. That's correct, yes.</b></p> <p>15 Q. Right. Can you tell us in practical terms, how you</p> <p>16 would go about applying the national decision model to</p> <p>17 a decision like this?</p> <p>18 <b>A. Obviously you look at the information and intelligence,</b></p> <p>19 <b>you look at the threat and then you consider what your</b></p> <p>20 <b>powers and policy are, getting tactical advice. Then</b></p> <p>21 <b>identify your contingencies and then you decide your</b></p> <p>22 <b>tactics appropriately and then obviously you review your</b></p> <p>23 <b>tactics.</b></p> <p>24 Q. This must be something which you had done on hundreds of</p> <p>25 occasions?</p> <p style="text-align: center;">Page 19</p>	<p>1 <b>A. It is very much drilled into you, certainly as a --</b></p> <p>2 <b>well, it affects every aspect of policing but certainly</b></p> <p>3 <b>in terms of armed policing and commanding armed</b></p> <p>4 <b>operations.</b></p> <p>5 Q. Yes.</p> <p>6 You have reeled off the relevant considerations</p> <p>7 there, and you would be aware that the code of ethics</p> <p>8 lies at the centre?</p> <p>9 <b>A. Yes. As you were saying I realised I had forgot the</b></p> <p>10 <b>code of ethics.</b></p> <p>11 Q. It wasn't a criticism.</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. What I am attempting to establish is when you go through</p> <p>14 that thought process, do you have a copy of the national</p> <p>15 decision model open as a sort of checklist or is it so</p> <p>16 ingrained in your mind that you didn't need to do that?</p> <p>17 <b>A. It is fairly ingrained in the mind, but I did have</b></p> <p>18 <b>a copy of it in my sort of notes that I had in relation</b></p> <p>19 <b>to firearms operations, it is always worth double</b></p> <p>20 <b>checking.</b></p> <p>21 Q. Do you know whether or not you did that on this</p> <p>22 occasion?</p> <p>23 <b>A. I probably didn't refer to my notes on this occasion,</b></p> <p>24 <b>because of the fast-time nature of it.</b></p> <p>25 Q. Right.</p> <p style="text-align: center;">Page 20</p>

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<p>1 Could we continue, please?</p> <p>2 <b>A. Yes, certainly.</b></p> <p>3 <b>So we have no start point other than in and around</b></p> <p>4 <b>the vicinity of Craven Park Road. There had been</b></p> <p>5 <b>a deployment, it is probably worth elaborating for</b></p> <p>6 <b>everyone's information, there had been a deployment at</b></p> <p>7 <b>that location the previous evening where there was</b></p> <p>8 <b>information that a commodity was going to be exchanged</b></p> <p>9 <b>but it was imprecise as to what that commodity was, we</b></p> <p>10 <b>were unsure whether it was going to be drugs or</b></p> <p>11 <b>firearms, there was nothing to lead us that way. And</b></p> <p>12 <b>that hence the early referral, so the further</b></p> <p>13 <b>information had come in to confirm on 13 October that it</b></p> <p>14 <b>was firearms.</b></p> <p>15 <b>Q. Yes.</b></p> <p>16 <b>A. So I have tasked DC Kinch with enquiring as to the</b></p> <p>17 <b>availability of surveillance assets:</b></p> <p>18 <b>"I am conscious that although I have no specifics re</b></p> <p>19 <b>timings, this could happen at the drop of a hat."</b></p> <p>20 <b>18.40:</b></p> <p>21 <b>"Still awaiting reply from surveillance tasking</b></p> <p>22 <b>office. I am at the office with one other officer, one</b></p> <p>23 <b>officer, others are at home or en route home, (on early</b></p> <p>24 <b>from other deployments/duties today) DC Kinch will</b></p> <p>25 <b>liaise with DS FE19 to call out SCO7 officers as</b></p> <p style="text-align: center;">Page 21</p>	<p>1 <b>a contingency."</b></p> <p>2 <b>Q. At 6.40 in the evening, that was your plan, that there</b></p> <p>3 <b>would be armed officers as a contingency in case</b></p> <p>4 <b>something happened?</b></p> <p>5 <b>A. Yes, so obviously my officers at SCO7 are not armed</b></p> <p>6 <b>surveillance officers, so my first port of call was to</b></p> <p>7 <b>go to SCO35, a surveillance wing who do have officers</b></p> <p>8 <b>that are armed, for their own protection during</b></p> <p>9 <b>surveillance operations. We couldn't get any response</b></p> <p>10 <b>at that time from the surveillance coordinating office,</b></p> <p>11 <b>who obviously at the time -- do what the name suggests,</b></p> <p>12 <b>they coordinate resources and obviously we needed to get</b></p> <p>13 <b>some sort of surveillance control in that area, so we</b></p> <p>14 <b>called out our own officers, even though they were just</b></p> <p>15 <b>getting home from a long day.</b></p> <p>16 <b>Q. Right. 19.15?</b></p> <p>17 <b>A. Thank you:</b></p> <p>18 <b>"The surveillance team are still deployed in</b></p> <p>19 <b>south-west London."</b></p> <p>20 <b>So we had no surveillance assets available to us:</b></p> <p>21 <b>"I take the view that this should be regarded as</b></p> <p>22 <b>a spontaneous operation. There is no other realistic</b></p> <p>23 <b>prospect of gaining quick control and responding to any</b></p> <p>24 <b>sightings/intelligence."</b></p> <p>25 <b>Then at 19.17, "TC", that's telephone call, and the</b></p> <p style="text-align: center;">Page 22</p>
<p>1 <b>arrow suggests who I have called, and that is the ARV</b></p> <p>2 <b>tactical firearms commander, Lynette Pearce, so when you</b></p> <p>3 <b>ask for spontaneous assets in this nature, an officer</b></p> <p>4 <b>holding that position on that day basically gives you</b></p> <p>5 <b>the approval or not. I obviously have to give her</b></p> <p>6 <b>an update around what the intelligence was and she was</b></p> <p>7 <b>satisfied with the intelligence case that I had given</b></p> <p>8 <b>her and had assets that she could give me and she:</b></p> <p>9 <b>"Deployed assets to assist, (3 ARVs)".</b></p> <p>10 <b>Q. Your note goes on to confirm that the intelligence</b></p> <p>11 <b>suggests that the exchange expected to take place was</b></p> <p>12 <b>going ahead and your team would be available after</b></p> <p>13 <b>9.00 pm before they arrived?</b></p> <p>14 <b>A. No, that -- it says the SV team there, I think that is</b></p> <p>15 <b>the assets from SCO35 were I think being freed up, but</b></p> <p>16 <b>they couldn't get to me until at least after 9.00 which</b></p> <p>17 <b>was probably going to be too late. Again, I have then</b></p> <p>18 <b>applied the national decision model again, because the</b></p> <p>19 <b>ARV -- I was arriving in a Quicksilver base, the ARVs</b></p> <p>20 <b>were arriving as well and I took the view it was not</b></p> <p>21 <b>practical to complete a full briefing to the armed</b></p> <p>22 <b>surveillance team, the ARVs were arriving, which are</b></p> <p>23 <b>sufficient to deal with the threat, by which time my</b></p> <p>24 <b>other resources, my officers are getting back to us.</b></p> <p>25 <b>So at 19.55 I have made a note that I briefed the</b></p> <p style="text-align: center;">Page 23</p>	<p>1 <b>Trojan team leader, the ARV team leader, Carl Beesley,</b></p> <p>2 <b>he has provided some TAC advice, and his preferred the</b></p> <p>3 <b>tactical option that if we were going to go to</b></p> <p>4 <b>an arrest/detention, it would be a compliant stop unless</b></p> <p>5 <b>there was an escalation of the threat.</b></p> <p>6 <b>Intelligence suggested this was purely going to be</b></p> <p>7 <b>an exchange, possibly a courier taking the firearms from</b></p> <p>8 <b>A to B.</b></p> <p>9 <b>Q. Right.</b></p> <p>10 <b>A. With no aggravating criminality.</b></p> <p>11 <b>Obviously that is criminal in itself, obviously, but</b></p> <p>12 <b>in terms of the threat levels.</b></p> <p>13 <b>Q. Yes.</b></p> <p>14 <b>A. I have made a note:</b></p> <p>15 <b>"I am engaged and endeavouring to contact SFC,</b></p> <p>16 <b>a strategic firearms commander, to discuss authority."</b></p> <p>17 <b>When you do deploy on a spontaneous operation, there</b></p> <p>18 <b>is obviously no definitive timescale as to how long</b></p> <p>19 <b>spontaneous is spontaneous, if you get my drift.</b></p> <p>20 <b>Q. Yes.</b></p> <p>21 <b>A. And obviously if it does drag on, then you are entering</b></p> <p>22 <b>the realms where you need to get full authority and</b></p> <p>23 <b>obviously I was conscious, probably about an hour and</b></p> <p>24 <b>a half then from when I first received the information</b></p> <p>25 <b>that the clock was ticking. So I am trying then to get</b></p> <p style="text-align: center;">Page 24</p>

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<p>1 hold of the on call strategic firearms commander for 2 SCO7 to update them and discuss whether they felt at 3 this stage it should move to a full authorised firearms 4 operation and whether they would give that authority. 5 As you can see from my notes, I had real difficulty 6 getting hold of anyone on that evening, so on call is 7 acting Detective Superintendent Alex Rothwell, as he was 8 at the time, I can't get hold of him, he is on call. 9 Then I was trying to get hold of the DI Southworth 10 from SCO8, which is Operation Trident, a similar crime 11 command to the organised crime command. 12 Q. Yes. 13 A. "(TBC)." 14 I was trying to find out maybe whether I could get 15 an SFC from Operation Trident. I wasn't having any 16 luck, so at 20.14 I got hold of Detective Superintendent 17 Barker, Detective Superintendent Barker was the 18 predecessor for Brendan Gilmour, she was our former 19 detective superintendent and she answered the phone off 20 duty, but was happy, as is her character, to be briefed 21 and she was happy that the operation still remained 22 spontaneous at that stage. 23 Q. So there was no need to start filling in forms and 24 making it any more formal. She gave you -- 25 A. She was happy, yes.</p> <p style="text-align: center;">Page 25</p>	<p>1 Q. She gave you the authority to continue as was? 2 A. Yes. 3 20.14 -- sorry, 20.40, I apologise, Lynette Pearce 4 briefed again, obviously she is concerned about her 5 assets, her pan-London assets obviously, on standby to 6 respond to any other spontaneous firearms incidents that 7 might happen and obviously she may not necessarily want 8 them tied up for an hour or two with me. 9 Q. Yes. 10 A. But she was happy at that stage, (a) it was still 11 spontaneous and (b) to let the assets remain with me. 12 At 21.08: 13 "Received an intelligence update to suggest the 14 exchange was still on." 15 Again, I have applied the national decision model. 16 I put no, triangle -- that is the limit of my shorthand 17 skills, it means "no change", no change, and that means 18 no change in terms of threat assessment, it is no 19 further specific intelligence to assist. I've got "SCO7 20 assets", so that is my surveillance officers have 21 surveillance control of Craven Park Road. 22 Q. Could I just ask you to pause again. 23 We can see, within a relatively short period of 24 time, a matter of a few hours, you have recorded that 25 you have assessed the situation by using the national</p> <p style="text-align: center;">Page 26</p>
<p>1 decision model three times? 2 A. That's correct, yes. 3 Q. What prompts you on the second and third occasion to 4 pause in your actions and assess the situation in 5 accordance with the national decision model? 6 A. Well, at 21.08 there had been an intelligence update, so 7 that is definitely a prompt to do it. It is 8 a continuous thing in any event and looking back at my 9 notes here, 19.14 again there had been another 10 intelligence suggest -- sorry, intelligence update. So 11 those were the two prompts on those occasions. 12 Q. Is that your usual practice, if, during the course of 13 preparation for a deployment, you come to understand 14 there has been fresh intelligence received or a change 15 in the intelligence, you would automatically think, 16 right, I need to reassess the situation and I am going 17 to use the national decision model? 18 A. Yes, it is a good moment just to take a pause, step back 19 and, as we would say -- I am sure this will be repeated 20 on various occasions throughout the course of this 21 inquiry -- spin the wheel, which is how we refer to the 22 national decision model. 23 Q. Because it is continuous? 24 A. It is continuous, yes. 25 Q. That is why it is designed in the shape that it is?</p> <p style="text-align: center;">Page 27</p>	<p>1 A. That's correct, yes. 2 Q. Thank you. 3 A. 21.11, again, I have updated Caroline Barker, detective 4 superintendent, and she was still content at that stage 5 it was still spontaneous. 6 Q. Yes. 7 A. Then very quickly after that events unfolded. The 8 previous evening a vehicle had arrived for the exchange. 9 Q. Yes. 10 A. And that was probably our thinking, it may even be the 11 same vehicle on this occasion. 12 Q. That the two men were seen driving on before their 13 arrest? 14 A. We thought a vehicle would turn up -- a car, sorry, 15 a car would turn up, that had been the series of events 16 the previous evening. We probably anticipated it might 17 be the same vehicle -- we had no intelligence to confirm 18 that, but a motorbike turned up towards the area we 19 thought the exchange might happen. 20 Q. Yes. 21 A. And then I have put, "events as per the surveillance 22 log", I put "intel log" to start with, that was 23 a mistake. I have annotated that as "surveillance log". 24 So things were happening too quick there for me 25 to -- so I have just, as it were recorded in the</p> <p style="text-align: center;">Page 28</p>

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<p>1 surveillance log, that is what was happening.  2 Obviously then I put "TACAD", so again I am speaking  3 to my tactical adviser, and because it is a motorbike as  4 well they do have other risk issues, probably well  5 advertised in terms of risk in terms of pursuit,  6 high-speed pursuit across London.  7 Q. Yes.  8 A. And his advice again was that this would have to be  9 a compliant stop. I was happy with that and if we  10 lost -- I put, "If he goes for it, so be it". So we  11 were not going to be getting into a high-speed pursuit  12 across London.  13 Unless there was -- we had the potential for getting  14 some aerial support, a helicopter, which the ARVs would  15 try and get for me.  16 But so at 21.34 I have gone to state amber. At that  17 stage the motorcycle was away from Craven Park Road. We  18 hadn't got sufficient surveillance evidence as I recall  19 to actually physically see a handover, but with the  20 intelligence pack profile that we had, the bike coming  21 and going, in my mind, it had taken possession of the  22 firearms and at that stage I have given amber.  23 And following the short surveillance process which  24 was conducted by my officers in particular, in  25 particular my surveillance motorcyclists, who did</p> <p style="text-align: center;">Page 29</p>	<p>1 an absolutely superb job keeping up with the stolen  2 bike, the ARVs managed to catch it. It stopped at some  3 traffic lights at Stamford Hill and obviously when the  4 stolen bike or the occupants on the bike saw the ARV,  5 they initially tried to make off, lost control of the  6 bike and it hit another vehicle and they were thrown  7 from it, and then that is when they were arrested after  8 a short foot chase.  9 Q. Thank you.  10 There is a reference there to helicopter support.  11 Can you confirm that in fact there was a helicopter  12 deployed?  13 A. I can't recall that, to be honest with you. There may  14 well have been, I can't recall that.  15 Q. Let's look then, please, at HMP12.  16 This is in our additional bundle, sir, at page 99.  17 THE CHAIRMAN: Thank you.  18 MS BLACKWELL: I will just turn that up.  19 Yes, thank you. I had highlighted it.  20 Could we go to page 7, please. I would just like to  21 ask you in relation to two aspects of the deployment.  22 The first is if we can see about two-thirds down the  23 page, "CCTV, Met Police helicopter", do you see that?  24 A. I do, yes.  25 Q. "Met Police helicopter, yes."</p> <p style="text-align: center;">Page 30</p>
<p>1 Does that help to you confirm that the helicopter  2 was deployed?  3 A. It would appear so, but I have no personal recollection.  4 Q. Who would organise that?  5 A. That was -- that would have been organised by the ARV, I  6 think Carl Beesley was the inspector or sergeant --  7 Q. Would you have discussed the possible deployment with  8 him?  9 A. Possibly. If he said, "Would you like that asset?"  10 I would obviously have said, "Yes, potentially", if  11 there are bikes going to make off across London, because  12 of the inherent risks with that, that would be a good  13 idea.  14 Q. Yes. A useful asset?  15 A. Absolutely.  16 Q. Yes.  17 Then towards the bottom of the page, we see BWV.  18 What does that stand for, please? Is that body-worn  19 video?  20 A. Sorry, yes, I've got that.  21 Q. At the bottom of the page.  22 A. Yes.  23 Q. We can see:  24 "Is BWV available? Yes."  25 A. That's correct, yes.</p> <p style="text-align: center;">Page 31</p>	<p>1 Q. Can you confirm that the officers involved in this  2 arrest on this day were wearing body-worn --  3 A. That is my recollection, they were wearing body-worn  4 video, yes.  5 Q. Is that something that you would have been involved in  6 arranging?  7 A. No.  8 Q. That would --  9 A. That is part of their standard operating procedures.  10 Q. It is part of their standard operating procedures?  11 A. Yes.  12 Q. Thank you, we can take that down, please.  13 Following the arrest on 13 October, we know that  14 Operation Utara officers became aware that their may be  15 an intended spring of Izzet Eren on his way to court for  16 the sentencing hearing at Wood Green on 11 December.  17 When did you first become aware of that?  18 A. I would say a day -- a day or two after 29 October,  19 I can't be precise.  20 Q. How did you become aware?  21 A. My recollection is that Mr Murray with one of the case  22 officers, maybe more than one of the case officers, came  23 into my office and told me about the intelligence.  24 Q. Was your office in the same building as Mr Murray's?  25 A. Yes, it was next door, yes.</p> <p style="text-align: center;">Page 32</p>



<p>1 Q. Right.</p> <p>2 What was it that you were told?</p> <p>3 <b>A. That there had been some sort of attempt or a plan was</b></p> <p>4 <b>in progress on that day to try and engineer an escape</b></p> <p>5 <b>bid on Mr Izzet Eren's behalf.</b></p> <p>6 Q. Right, well I need to ask you to break that down</p> <p>7 a little bit, because we now know that there was</p> <p>8 an attempt which wasn't successful and was aborted on</p> <p>9 29 October. We also know that there was a plan, as</p> <p>10 I have set out, to perform the same exercise on</p> <p>11 11 December.</p> <p>12 <b>A. That's correct.</b></p> <p>13 Q. When you were told on or about 30 October, I am going to</p> <p>14 suggest, were you aware that there had been an aborted</p> <p>15 attempt or were you only told that there was going to be</p> <p>16 a future attempt.</p> <p>17 <b>A. No, I was aware that there had been an aborted attempt.</b></p> <p>18 Q. Is that what you were referring to when you said on the</p> <p>19 same day or the day before, I think you might have said?</p> <p>20 <b>A. Sorry, when I was informed?</b></p> <p>21 Q. Yes.</p> <p>22 <b>A. It was either the 30th or a day or so after. I can't</b></p> <p>23 <b>specifically remember, but when I was told that there</b></p> <p>24 <b>had been some form of attempt/plot, and then that was</b></p> <p>25 <b>aborted, it was non-effective.</b></p> <p style="text-align: center;">Page 33</p>	<p>1 THE CHAIRMAN: Are you saying that you learnt about the</p> <p>2 abortive plot on the 29th and the intended spring on</p> <p>3 11 December at the same time?</p> <p>4 <b>A. I can't specifically recall. I may well have done.</b></p> <p>5 <b>I can't specifically recall whether it was two separate</b></p> <p>6 <b>times I was informed about that.</b></p> <p>7 THE CHAIRMAN: Thank you.</p> <p>8 MS BLACKWELL: But you are sure that --</p> <p>9 <b>A. Sorry to interrupt. I think the picture in the initial</b></p> <p>10 <b>stages was fairly cloudy and needed further development</b></p> <p>11 <b>and assessment. So I may have had a second update in</b></p> <p>12 <b>relation to the intention to commit a further attempt on</b></p> <p>13 <b>11 December.</b></p> <p>14 Q. Right, but in your mind the order in which you were told</p> <p>15 was the aborted attempt that had happened in the days</p> <p>16 close to when you were first told about an escape and</p> <p>17 then perhaps on a second occasion --</p> <p>18 <b>A. Perhaps it might have been the same time, I can't recall</b></p> <p>19 <b>I am afraid.</b></p> <p>20 Q. Did you make a note of it?</p> <p>21 <b>A. I didn't.</b></p> <p>22 Q. Why not?</p> <p>23 <b>A. Because I wasn't the SIO of the operation.</b></p> <p>24 Q. Does that mean that you wouldn't be assisted by making</p> <p>25 a note of information that has come into you?</p> <p style="text-align: center;">Page 34</p>
<p>1 <b>A. I didn't feel at that stage that I did need to make</b></p> <p>2 <b>a note, Mr Murray was the SIO, he was informing me.</b></p> <p>3 <b>Undoubtedly I would have said along the lines of: can we</b></p> <p>4 <b>make sure that we get some intelligence in relation to</b></p> <p>5 <b>that in a format that we can break out, because if there</b></p> <p>6 <b>is risk issues to be concerned, Mr Murray being</b></p> <p>7 <b>Mr Murray, he was all over that from my recollection,</b></p> <p>8 <b>and in the event that was in hand. And it was then</b></p> <p>9 <b>a case, "Well, okay, just keep us posted, keep us</b></p> <p>10 <b>posted".</b></p> <p>11 THE CHAIRMAN: You would expect him to make a note as the</p> <p>12 SIO?</p> <p>13 <b>A. I would have expected him to do that, yes.</b></p> <p>14 THE CHAIRMAN: Yes.</p> <p>15 MS BLACKWELL: Did you have a daybook?</p> <p>16 <b>A. I didn't keep a daybook, no.</b></p> <p>17 Q. Why not?</p> <p>18 <b>A. I have kept daybooks in the past, particularly when</b></p> <p>19 <b>I was an SIO, but I wasn't an SIO and it didn't really</b></p> <p>20 <b>suit me in my role, as I have explained earlier, in</b></p> <p>21 <b>terms of it was a management role, non-operational,</b></p> <p>22 <b>essentially other than TFCing, to keep a daybook.</b></p> <p>23 <b>I just preferred to go to meetings, come back from those</b></p> <p>24 <b>meetings and often I would type up any notes that I made</b></p> <p>25 <b>and retain those in my computer and disseminate them for</b></p> <p style="text-align: center;">Page 35</p>	<p>1 <b>the information of the office for other people at the</b></p> <p>2 <b>meetings and in relation to strategic projects I was</b></p> <p>3 <b>running. So I didn't keep a daybook.</b></p> <p>4 Q. All right, that was your personal choice?</p> <p>5 <b>A. That was my personal choice, yes.</b></p> <p>6 Q. Because other people who you would have been in contact</p> <p>7 with, colleagues who held similar roles and ranks to</p> <p>8 you, their decision may have been to keep a daybook?</p> <p>9 <b>A. Yes, it was a personal decision. When I was an SIO, in</b></p> <p>10 <b>terms of operations such as Operation Utara, I had</b></p> <p>11 <b>previously kept daybooks and another method I used was</b></p> <p>12 <b>to use a decision log and use that effectively as</b></p> <p>13 <b>a diary for that operation.</b></p> <p>14 <b>That had the advantage of keeping updates on a daily</b></p> <p>15 <b>basis for that operation in one defined place.</b></p> <p>16 <b>Obviously sometimes with a daybook you can be dragged on</b></p> <p>17 <b>one page various different directions of different</b></p> <p>18 <b>things that are happening. In terms of managing that,</b></p> <p>19 <b>it is sometimes better just to do it, I found</b></p> <p>20 <b>personally, to have it in one book and I used a decision</b></p> <p>21 <b>log for that and I used that effectively as a running</b></p> <p>22 <b>day-to-day log of the operations.</b></p> <p>23 Q. One aspect and benefit of keeping a daybook, and logging</p> <p>24 something like this information or intelligence that was</p> <p>25 coming to you is that you would now be able to tell us</p> <p style="text-align: center;">Page 36</p>

<p>1 whether or not the two pieces of information about the 2 different escape plots had come to you at the same time 3 or not, wouldn't you?</p> <p>4 <b>A. Yes, I accept that, yes.</b></p> <p>5 Q. Right.</p> <p>6 We know from telephone records that the inquiry has 7 been provided with that over the course of the next few 8 days you spoke on the telephone to SIO Murray and also 9 to FE19 and to Mr Turner.</p> <p>10 As well as sharing an office with Mr Murray, was it 11 your regular practice to speak to him on the telephone 12 as well?</p> <p>13 <b>A. Yes, because he wasn't always sat in the office next 14 door. He was the operational officer so he was out and 15 about as well.</b></p> <p>16 Q. What would the nature of those calls be?</p> <p>17 <b>A. Operational updates, administrative things that I recall 18 I had -- doing. He would update me, obviously as the 19 DCI in the office I needed to have an awareness of what 20 was going on in terms of operations and the resources, 21 because I was accountable for those at sort of more 22 senior management meetings, that I would go to with 23 Mr Gilmour, and his predecessor Caroline Barker, so it 24 was part and parcel of a day-to-day busy operational 25 office with me as the DCI would speak to my two DIs.</b></p> <p style="text-align: center;">Page 37</p>	<p>1 Q. If you are sitting in the office taking a telephone call 2 from Mr Murray or Mr Gilmour or FE19, would you make 3 a note of what you were talking about if you were being 4 provided with information?</p> <p>5 <b>A. Not necessarily, not necessarily. Because obviously, as 6 I say, the operations were the domain of Mr Murray, not 7 me.</b></p> <p>8 Q. We have seen you have made a very full note about the 9 deployment on 13 October. Was there a specific reason 10 for you making that note?</p> <p>11 <b>A. Well, that was an operational deployment and I was the 12 TFC, so it provided a record of my decision-making 13 process throughout the course of that evening.</b></p> <p>14 Q. When we come to look at what occurred on 11 December, 15 will we see a similar log?</p> <p>16 <b>A. Part and parcel, you will see a very full opening 17 comment from me at the start of the operational 18 deployment as to my rationale and how I intended to run 19 the operation on the day.</b></p> <p>20 Q. Where do we find that?</p> <p>21 <b>A. It will be in here. At the start of my operation log --</b></p> <p>22 Q. In your witness statement?</p> <p>23 <b>A. No, it is an operational log.</b></p> <p>24 Q. In the FA2 form?</p> <p>25 <b>A. It is a separate log that I kept on the day.</b></p> <p style="text-align: center;">Page 38</p>
<p>1 Q. All right, the handwritten log that you kept whilst you 2 were in C3000?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. But that is --</p> <p>5 <b>A. So, just coming back to what I was saying, there is 6 quite a long narrative of handwriting in relation to 7 that. But prior to the operation I was conscious of how 8 I could best record what was going on to assist as 9 an aide-memoire, so I made a decision, a conscious 10 decision, to draw up a bespoke grid, because of the 11 separate deployments that were going on that day, it was 12 different from the norm, I think, in terms of 13 an operational deployment where you will have one 14 deployment, maybe one -- maximum two, subject vehicles 15 for example but on that occasion we had three different 16 deployments, multi assets deployed and I needed to know 17 at any one stage where those three deployments were.</b></p> <p>18 <b>So in terms of keeping as comprehensive notes on 19 11 December as the operation went on as I had done on 20 13 October, that wasn't practicable in my view. And 21 hence the second phase of my record keeping on 22 11 December was on that grid that I drew up, I drew up 23 as an aide-memoire.</b></p> <p>24 Q. I think what you are describing, Mr Williams, is that 25 you didn't keep the log in the way in which we have</p> <p style="text-align: center;">Page 39</p>	<p>1 looked at, how it was done on 13 October, you chose 2 a different format that was more applicable to what was 3 taking place?</p> <p>4 <b>A. That was a conscious decision, I thought that would suit 5 my purpose best.</b></p> <p>6 Q. Thank you.</p> <p>7 Then, afterwards, did you take the decision log that 8 you had handwritten that day and make that up into 9 additional notes?</p> <p>10 <b>A. Yes, that was a -- no, not additional notes, that was as 11 an aide-memoire to assist me in my statement.</b></p> <p>12 Q. For your witness statement?</p> <p>13 <b>A. Yes, that was handed over during the post-incident 14 procedure.</b></p> <p>15 Q. To be fair to you, Mr Williams, I think we just should 16 have a look at the log that you have referred to so that 17 everyone can understand the way in which it was kept.</p> <p>18 Could we put up, please, IPC15. Is this the log 19 that you were referring to?</p> <p>20 <b>A. That's correct, yes.</b></p> <p>21 Q. Can we flick through the pages, please, just to confirm 22 the extent of it. I think it runs to five pages.</p> <p>23 We can see the times down the left-hand side.</p> <p>24 Again, are those the times that matters were occurring 25 and then there is an event update and other --</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 <b>A. That's correct, and then I've got A, B and C, which are</b>  2 <b>the three separate deployments and really it is the</b>  3 <b>location of those three separate deployments of the</b>  4 <b>prison van, the Audi, and Borg -- which is obviously the</b>  5 <b>codename for Ozcan Eren.</b>  6 Q. Yes, and if we can go to the end of that document,  7 please, there are three or four more pages, we can see  8 that the times run through to 9.39, when the log was  9 completed?  10 <b>A. That's correct, yes.</b>  11 Q. Thank you.  12 We can take that down.  13 I would like to ask you some questions now about the  14 meeting that took place on 10 November.  15 <b>A. Yes.</b>  16 Q. You have dealt with this meeting in your witness  17 statement, and I would like to just look at that  18 together, please, this is the witness statement that you  19 made on 16 December 2015. It is at MPS71. Can we go to  20 page 3, please.  21 Thank you.  22 Looking at the second paragraph on that page, we can  23 see:  24 "I took the view that there were potential tactical  25 options available to me. Effective control of the Audi</p> <p style="text-align: center;">Page 41</p>	<p>1 was paramount as this provided the optimum opportunity  2 to close intelligence gaps and conduct any operation  3 safely."  4 Just pausing there, by the time you met with others  5 on 10 November, had you become aware that the mission  6 vehicle for what was to take place on 11 December had  7 been identified as a stolen Audi that was bearing false  8 plates?  9 <b>A. Yes, I was aware that we had located that vehicle, yes.</b>  10 Q. Right.  11 By 10 November, had you become aware that the plan  12 to spring Izzet Eren was likely to take place on  13 11 December at his next court appearance?  14 <b>A. I was aware that that was the plan of the conspirators,</b>  15 <b>yes.</b>  16 Q. Thank you.  17 You say:  18 "During the week of 9 November, DI Murray, with  19 myself as the likely TFC, had a provisional discussion  20 with the probable strategic firearms commander (FE14)."  21 That is Mr --  22 <b>A. Is that Mr Turner?</b>  23 Q. That is Mr Turner:  24 "... and our own line manager, FE15 ..."  25 Is that Mr Gilmour?</p> <p style="text-align: center;">Page 42</p>
<p>1 <b>A. That's correct.</b>  2 Q. "... as to how we hoped to progress the operation. We  3 took the view that if effective control of the Audi was  4 obtained and maintained then there was a real  5 opportunity to disrupt this conspiracy, maximise our  6 chances of recovering firearms from the streets of north  7 London and of reducing public risk in the long term."  8 Just pausing there, did you take any notes of the  9 meeting which took place during the week of 10 November?  10 <b>A. I didn't, no.</b>  11 Q. Right.  12 In fact, when you came to deal with that meeting in  13 this witness statement of 16 December 2015, did you  14 struggle to identify the day of the week that that  15 meeting had taken place on?  16 <b>A. I did, yes. I did.</b>  17 <b>Unfortunately, I was unable to communicate with</b>  18 <b>anyone else to confirm that, so --</b>  19 Q. Understood. But if you had had your own notes, you  20 would have been able to refresh your memory from those?  21 <b>A. Yes, I could have, yes.</b>  22 Q. Did you consider that it was your requirement to take  23 a note?  24 <b>A. I didn't.</b>  25 THE CHAIRMAN: You didn't?</p> <p style="text-align: center;">Page 43</p>	<p>1 <b>A. I didn't consider it was my requirement to take a note.</b>  2 MS BLACKWELL: Why not?  3 <b>A. It was -- it was my understanding that the Metropolitan</b>  4 <b>Police position at the time was that any decisions made</b>  5 <b>at preparation and planning meetings should be recorded</b>  6 <b>in the FA forms and that was then stored at the firearms</b>  7 <b>policy unit and that was the audit trail for the</b>  8 <b>decision and planning decisions that were made, options</b>  9 <b>I would have taken or rejected.</b>  10 <b>I may well have been wrong on that, but that was my</b>  11 <b>understanding at the time so I did not take a note.</b>  12 <b>Could I have taken a note? Yes, I could. Would it</b>  13 <b>have been good practice? As we have highlighted, yes,</b>  14 <b>it was.</b>  15 THE CHAIRMAN: How long after the meeting was the relevant  16 FA form completed?  17 <b>A. Three -- three and a half weeks.</b>  18 THE CHAIRMAN: You are saying that that was what you  19 understood to be the policy?  20 <b>A. That was my understanding of the policy at the time,</b>  21 <b>yes.</b>  22 THE CHAIRMAN: Yes.  23 MS BLACKWELL: Were you aware of whether or not anybody else  24 present at the meeting was taking a note?  25 <b>A. I was of the opinion that other notes were being taken.</b></p> <p style="text-align: center;">Page 44</p>

11 (Pages 41 to 44)

<p>1 Q. By whom?</p> <p>2 <b>A. We also had S48 was at the meeting, I haven't included</b></p> <p>3 <b>in my statement, which is an oversight, who was actually</b></p> <p>4 <b>tactical adviser on the day. He was definitely there</b></p> <p>5 <b>taking notes, and I would have imagined Mr Murray was</b></p> <p>6 <b>taking notes as well.</b></p> <p>7 Q. Let's just look, please, at the College of Policing</p> <p>8 advice on record keeping, and it is at COP18. At</p> <p>9 page 16, please, Mr Coates.</p> <p>10 THE CHAIRMAN: Just before we do, do I understand you to be</p> <p>11 saying because it was the SIO's "duty" or your</p> <p>12 expectation of the SIO to take a note in his capacity as</p> <p>13 SIO, that would have applied to this meeting as well?</p> <p>14 <b>A. No, I don't think that is quite correct.</b></p> <p>15 THE CHAIRMAN: Why would you expect Mr Murray to make</p> <p>16 a note?</p> <p>17 <b>A. Because that is the sort of officer he was.</b></p> <p>18 THE CHAIRMAN: I see.</p> <p>19 MS BLACKWELL: If we look at the bottom of this page, we can</p> <p>20 see there is the heading "Record keeping":</p> <p>21 "Individual commanders must be prepared to account</p> <p>22 for their decisions and to explain their rationale at</p> <p>23 the time that those decisions were taken. All plans</p> <p>24 should be documented, including options rejected or</p> <p>25 progressed, together with the reasons why such</p> <p style="text-align: center;">Page 45</p>	<p>1 conclusions were drawn and by whom."</p> <p>2 Would you agree that this was a planning meeting for</p> <p>3 what eventually took place on 11 December?</p> <p>4 <b>A. Yes, I would agree with that.</b></p> <p>5 Q. Would you also agree that according to what we have just</p> <p>6 read in the APP armed policing, you, as a commander,</p> <p>7 really, following best practice, should have kept a note</p> <p>8 of the meeting?</p> <p>9 <b>A. Yes, I accept that.</b></p> <p>10 Q. Thank you. Were there any formal minutes kept of the</p> <p>11 meeting?</p> <p>12 <b>A. There were not.</b></p> <p>13 Q. Do you accept that perhaps in hindsight that should also</p> <p>14 have happened?</p> <p>15 <b>A. Again, with hindsight, that would have been good</b></p> <p>16 <b>practice, yes.</b></p> <p>17 Q. Who called the meeting?</p> <p>18 <b>A. I think Mr Murray arranged it.</b></p> <p>19 Q. Yes.</p> <p>20 <b>A. But obviously because I was aware that the vehicle had</b></p> <p>21 <b>been found, in my view that gave us the ability to turn</b></p> <p>22 <b>the intelligence, which was non-evidence intelligence,</b></p> <p>23 <b>into an actionable form of intelligence and obviously we</b></p> <p>24 <b>then needed to progress how we were going to do that and</b></p> <p>25 <b>because of the nature of the plot that was being</b></p> <p style="text-align: center;">Page 46</p>
<p>1 <b>planned, that we needed to consult at an early stage</b></p> <p>2 <b>with not only our line manager, but also a strategic</b></p> <p>3 <b>firearms commander and get potential advice from</b></p> <p>4 <b>experienced SCO19 officers as to whether this (a) was</b></p> <p>5 <b>a feasible opportunity to respond operationally and more</b></p> <p>6 <b>importantly: was it safe to do so?</b></p> <p>7 Q. Well, you were there as the proposed tactical firearms</p> <p>8 commander, weren't you?</p> <p>9 <b>A. That's correct, yes.</b></p> <p>10 Q. Mr Turner was there as the proposed strategic firearms</p> <p>11 commander?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. S48 was there as the proposed tactical adviser?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Mr Murray was there as the SIO of the operation?</p> <p>16 <b>A. That's correct.</b></p> <p>17 Q. So although you describe it in terms of whether or not</p> <p>18 it was feasible, during the course of that meeting it</p> <p>19 was established between you, I suggest, that, really,</p> <p>20 this was the plan that you were all supporting and that</p> <p>21 you wanted to proceed: armed deployment?</p> <p>22 <b>A. That was a direction the direction we wished to go.</b></p> <p>23 <b>There were a lot of hurdles to overcome --</b></p> <p>24 Q. You hadn't made the applications yet?</p> <p>25 <b>A. We hadn't made the applications. The event was still</b></p> <p style="text-align: center;">Page 47</p>	<p>1 <b>a month away. In our line of work, operations rise and</b></p> <p>2 <b>fall on a daily basis. We have discussions on a near</b></p> <p>3 <b>daily basis about potential operations that we may take</b></p> <p>4 <b>part in, but they fall out of bed for various reasons.</b></p> <p>5 <b>So the sort of meeting that we had on this occasion</b></p> <p>6 <b>was not untypical of that. We had to make all the</b></p> <p>7 <b>applications and it was evident that we had to include</b></p> <p>8 <b>in any operational response, the prison service and the</b></p> <p>9 <b>court to advise them (a) of what the intelligence was</b></p> <p>10 <b>and (b) our proposed operational response and to get</b></p> <p>11 <b>their acquiescence to that. Without either of those, we</b></p> <p>12 <b>could not have progressed the operation.</b></p> <p>13 Q. You appreciated during the course of this meeting that,</p> <p>14 in order for it to progress, you would need the</p> <p>15 acquiescence or consent of the Crown Court?</p> <p>16 <b>A. That's correct, yes.</b></p> <p>17 Q. And you would need the acquiescence or consent of the</p> <p>18 prison?</p> <p>19 <b>A. That's correct.</b></p> <p>20 Q. Would you need the acquiescence or consent of those who</p> <p>21 were going to be transporting Mr Eren to court, in other</p> <p>22 words Serco?</p> <p>23 <b>A. No, not necessarily them.</b></p> <p>24 Q. Why not?</p> <p>25 <b>A. The decision was made because of inherent corruption</b></p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 <b>issues within that organisation, particularly within the</b> 2 <b>prison service regime.</b> 3 Q. Was that discussed at this meeting, the suspected 4 corruption issues within that organisation? 5 <b>A. I believe it was discussed, yes.</b> 6 Q. Who raised it? 7 <b>A. I can't recall that specifically. It was well known,</b> 8 <b>you know, within the organised crime command that those</b> 9 <b>issues, sadly, were inherent.</b> 10 Q. Are you able to describe in any further detail what 11 those corruption issues were, to your mind? 12 <b>A. Well, it could take shape in a variety of ways,</b> 13 <b>potentially assisting and smuggling contraband, mobile</b> 14 <b>phones into prison, or even worse giving information to</b> 15 <b>prisoners about police activity, which was obviously</b> 16 <b>a concern for us in relation to this operation.</b> 17 Q. Those were all things that you knew had happened with 18 this organisation; is that your evidence? 19 <b>A. That is my evidence, yes.</b> 20 Q. At this meeting on 10 November, was it decided between 21 those present that, if this plan was going to proceed, 22 there would be no discussion of it in advance or 23 acquiescence sought from Serco? 24 <b>A. That was the decision I think we all came to</b> 25 <b>collectively on that meeting, as I recall it, yes.</b></p> <p style="text-align: center;">Page 49</p>	<p>1 Q. Right. 2 I would like to just touch upon three additional 3 parts of the discussion that took place on that date, 4 according to your witness statement. We don't need to 5 put the witness statement back up, Mr Coates, but I will 6 just read from it, if I may: 7 "At this stage I had considered various other 8 tactical options to mitigate the threat. Eg video-link 9 the court appearance, use the Metropolitan Police 10 special escort group to convey the prisoners and simply 11 seize the Audi. In my opinion however, all such options 12 would not address any potential attempt in the future, 13 for example the potential for Izzet Eren to feign 14 illness and get to hospital from where an escape bid 15 could be made." 16 I would like to take those individually, if I may. 17 What consideration was given during the course of 18 that meeting to video-linking the sentencing hearing? 19 <b>A. It was discussed as a potential option --</b> 20 Q. Yes. 21 <b>A. -- of dealing with it. And in relation to -- it was</b> 22 <b>more of a discussion around not only the feasibility of</b> 23 <b>conducting the operation but could we disrupt it and if</b> 24 <b>we disrupted it, would it deal with the long-term threat</b> 25 <b>issues or merely delay it to a future occasion where we</b></p> <p style="text-align: center;">Page 50</p>
<p>1 <b>didn't have intelligence support around it to maximise</b> 2 <b>the safety of the public in the longer term. Sustain</b> 3 <b>public protection, which I am sure we will come on to at</b> 4 <b>some stage.</b> 5 <b>So in relation to individually specifically</b> 6 <b>assessing each of the potential disruption options,</b> 7 <b>probably it wasn't a detailed discussion of them</b> 8 <b>individually, as I recall, it was more disruption as</b> 9 <b>a whole, what are the potential options? Will they</b> 10 <b>address the long-term sustained public protection</b> 11 <b>issues?</b> 12 Q. Do I take it from your explanation that the video-link 13 was obviously an option -- 14 <b>A. Yes, it was obviously an option.</b> 15 Q. -- it would have been discussed, but in the mind of 16 those present at the meeting, the collective mind, it 17 would not have allowed for the disruption of the gang, 18 of the plan -- it would have simply, in your mind, 19 possibly delayed it? 20 <b>A. Delayed it to a time when we wouldn't have the</b> 21 <b>intelligence assets in place and therefore been able to</b> 22 <b>deploy sufficient resources to mitigate the threat. It</b> 23 <b>would have increased the risk in the longer term.</b> 24 Q. Did you consider, for instance, the prospect of 25 Izzet Eren being made a category A or high risk</p> <p style="text-align: center;">Page 51</p>	<p>1 category A prisoner? 2 <b>A. I don't recall that being discussed at that meeting.</b> 3 Q. You would know though the additional security that would 4 have attached to him had his categorisation been raised? 5 <b>A. I would be aware of that in general terms, yes.</b> 6 Q. Right. 7 But you don't remember that being discussed? 8 <b>A. I don't recall that, I am sorry.</b> 9 Q. What was the most important aspect of this operation to 10 you, Mr Williams, was it preventing the escape of 11 Izzet Eren, whether it be now or in the long term, or 12 was it arresting members of the organised crime network? 13 <b>A. The most important aspect of this operation was the</b> 14 <b>long-term public protection of the people of London,</b> 15 <b>particularly in and around Haringey and Hackney, and</b> 16 <b>because in my view Izzet Eren, who, having been</b> 17 <b>convicted of drug trafficking offences and been deported</b> 18 <b>from the country, had returned to the UK with a specific</b> 19 <b>intent and that intent was to kill or seriously harm</b> 20 <b>someone. My own personal opinion, it was to kill.</b> 21 <b>That was corroborated by some unsolicited comments</b> 22 <b>from Mr Amoyaw-Gyamfi on the arrest on 13 October.</b> 23 <b>You have to look back to the feud that went on</b> 24 <b>between 2009 and 2013 between the Eren and the Armagan</b> 25 <b>crime families, the Armagans being more Hackney based,</b></p> <p style="text-align: center;">Page 52</p>

<p>1 the Erens more Tottenham based. During that four-year 2 period, I can't give you the precise number of 3 shootings, we may not have on police record how many 4 shootings took place, but at least 20, five murders. 5 Two of those murders were completely innocent people 6 unconnected to the feud. People were shot down in front 7 of their family and children. There was genuine fear 8 within the community and if you look back at the press 9 cuttings from that time, they will be reflected, the 10 comments of Mr Lammy the local MP about the fear in the 11 community, the lawlessness in the community and 12 something needed to be done otherwise we would live to 13 regret it in the long term.</p> <p>14 Him coming back with the intent -- he was obviously 15 on his way to Hackney that night when we intercepted 16 him, was going to re-instigate that feud which had gone 17 quiet since 2013. I don't think it was coincidental 18 that he was overseas having been deported in that time 19 period.</p> <p>20 Although he was in prison serving -- or likely to 21 serve a lengthy custodial sentence, he still had his 22 cousin Ozcan outside who was controlling the organised 23 crime network on his behalf.</p> <p>24 There was a really real threat in my mind and this 25 was the driving force for me in this operation that that</p> <p style="text-align: center;">Page 53</p>	<p>1 feud was going to re-instigate and we would return to 2 the murder and mayhem, and again coming back to 3 Mr Lammy's comments, of New York-style mafia shootings 4 being carried out on the streets of London. That really 5 for me was the raison d'etre of this operation and that 6 was the driving force, in answer to your question.</p> <p>7 Q. In terms of the three options that you were considering 8 and that are set out in your witness statement.</p> <p>9 The video-link option, although that would have, you 10 say, in the short term, avoided any potential breakout, 11 would not have allowed you to arrest any other member of 12 the organised criminal network.</p> <p>13 The use of Metropolitan Police special escort group 14 to convey the prisoners, what was that?</p> <p>15 A. The special escort group do convey high risk prisoners, 16 terrorists for example, maybe not now, because I think 17 obviously they use Belmarsh court where there is 18 a tunnel underneath --</p> <p>19 Q. To Woolwich Crown Court?</p> <p>20 A. But historically they would convey high-risk prisoners 21 from prison to court at high speed as a safety 22 contingency, so that was another potential option that 23 we spoke about. I don't think anyone in that room -- 24 S48 might have had more knowledge about how they worked 25 but certainly us within SCO7 --</p> <p style="text-align: center;">Page 54</p>
<p>1 THE CHAIRMAN: It would have the same problem, as far as you 2 were concerned, it would get Eren to court safely but it 3 wouldn't do anything about the long term?</p> <p>4 A. Exactly.</p> <p>5 THE CHAIRMAN: Yes.</p> <p>6 A. Apologies.</p> <p>7 THE CHAIRMAN: That is all right.</p> <p>8 MS BLACKWELL: Then seizing the Audi, again that would have 9 taken away the means by which --</p> <p>10 A. It would have taken away that vehicle. I must admit, 11 myself I had some reservations whether the vehicle would 12 be used again the second time. If it had been -- as the 13 intelligence suggested an aborted attempt, it may be 14 that they would have decided to use a different vehicle.</p> <p>15 But as we had it at the time, the intelligence was 16 that that was that vehicle. If we took it away, they 17 would have had the opportunity to arrange another 18 vehicle.</p> <p>19 Q. What you are describing is, although you had received 20 intelligence that that was going to be the vehicle 21 used --</p> <p>22 A. I was open minded.</p> <p>23 Q. You were open minded and you appreciated that it was 24 perfectly possible, either over the course of the next 25 few weeks or at the very last minute, that the gang</p> <p style="text-align: center;">Page 55</p>	<p>1 would decide to abandon that and to use a different 2 vehicle?</p> <p>3 A. Yes, and where was it parked? It was parked in a small 4 residential car park, there was every chance that 5 a member of the public, local community, would have not 6 been happy with that vehicle, rung the police, it would 7 have been discovered as being on false plates and just 8 seized.</p> <p>9 Q. And that would have forced the gang to choose another 10 vehicle?</p> <p>11 A. To go elsewhere, yes.</p> <p>12 Q. Just before we leave this topic, I just want to read out 13 another sentence that appears in your witness statement 14 in relation to this meeting and the time around its 15 being held:</p> <p>16 "The current intelligence regarding the plot to free 17 his brother indicated that he had access to another 18 firearm, which placed an obligatory duty on the 19 operational team to try and recover it."</p> <p>20 This related to Ozcan Eren, didn't it?</p> <p>21 A. This related to the first aborted plot, there was 22 intelligence to suggest that a firearm had been used, 23 that I was made aware of in ...</p> <p>24 Q. Let's look at that, please --</p> <p>25 THE CHAIRMAN: Do you want to look at it now or do you want</p> <p style="text-align: center;">Page 56</p>

<p>1 to at some stage take a break?</p> <p>2 MS BLACKWELL: I was going it take a break after this point,</p> <p>3 sir, if that is convenient.</p> <p>4 THE CHAIRMAN: Certainly.</p> <p>5 MS BLACKWELL: Page 3, please.</p> <p>6 THE CHAIRMAN: Yes.</p> <p>7 MS BLACKWELL: Thank you.</p> <p>8 Halfway down the page, we can see the three aspects</p> <p>9 of the optional planning, which we have just been</p> <p>10 through.</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. If we read from the second sentence in the following</p> <p>13 paragraph:</p> <p>14 "He would inevitably have decamped overseas at some</p> <p>15 stage [that is Izzet Eren] and there still remained the</p> <p>16 possibility that he would the intent to carry out</p> <p>17 whatever attack he was planning on 13 October before he</p> <p>18 fled. Furthermore the operational team had been</p> <p>19 presented with a rescue opportunity to arrest Ozcan Eren</p> <p>20 and unknown associates and address the represents</p> <p>21 a significant threat in his own right as a criminal</p> <p>22 within Haringey, with intelligence linking him to</p> <p>23 firearms and the feud with their Hackney rivals still</p> <p>24 very much ongoing."</p> <p>25 That is what you have described to us this morning:</p> <p style="text-align: center;">Page 57</p>	<p>1 "The current intelligence regard the plot to free</p> <p>2 his brother indicated that he had access to another</p> <p>3 firearm, which placed an obligatory duty on the</p> <p>4 operational team to try and recover it."</p> <p>5 Now, he is referred to as Izzet Eren's brother, in</p> <p>6 fact we now know it was his cousin?</p> <p>7 <b>A. That's correct, yes.</b></p> <p>8 Q. To what were you referring when you --</p> <p>9 <b>A. I was referring there to intelligence that I was made</b></p> <p>10 <b>aware of that on first attempt, the aborted attempt,</b></p> <p>11 <b>that there was an imitation -- sorry, there was</b></p> <p>12 <b>a firearm in the possession of the conspirators on that</b></p> <p>13 <b>occasion.</b></p> <p>14 Q. Did you know whether that firearm was a real or</p> <p>15 an imitation firearm?</p> <p>16 <b>A. My indication was that it was a viable firearm.</b></p> <p>17 MS BLACKWELL: Thank you.</p> <p>18 Is that a convenient moment, sir.</p> <p>19 THE CHAIRMAN: Certainly. Shall we resume at 11.40?</p> <p>20 MS BLACKWELL: Thank you.</p> <p>21 THE CHAIRMAN: Thank you.</p> <p>22 (11.22 am)</p> <p>23 (A short adjournment)</p> <p>24 (11.40 am)</p> <p>25 MS BLACKWELL: Thank you, sir.</p> <p style="text-align: center;">Page 58</p>
<p>1 Mr Williams, just before the break, we were come to</p> <p>2 the end of my questioning about the meeting that took</p> <p>3 place on 10 November.</p> <p>4 But I just want to touch upon something which we</p> <p>5 have already discussed and that is the possibility of</p> <p>6 arranging for suggesting that the categorisation of</p> <p>7 Izzet Eren be raised. You accepted that if that had</p> <p>8 happened, if he had been raised to a category A or</p> <p>9 a high risk A or an exceptionally high risk A, then he</p> <p>10 would have been undoubtedly been subject to additional</p> <p>11 security implications.</p> <p>12 <b>A. Yes, I accept that, yes.</b></p> <p>13 Q. The inquiry heard yesterday from Governor Nichols from</p> <p>14 HMP Wormwood Scrubs, who told us about the other</p> <p>15 possibility of putting him on what is called an escape</p> <p>16 risk list.</p> <p>17 Were you aware of that as a possibility?</p> <p>18 <b>A. I wasn't aware of that, no.</b></p> <p>19 Q. All right. So that wasn't something which would have</p> <p>20 been discussed between you and the others at this</p> <p>21 meeting?</p> <p>22 <b>A. It wasn't, no.</b></p> <p>23 THE CHAIRMAN: Did you know of the existence of a E list?</p> <p>24 <b>A. That is the first time I think I have heard that</b></p> <p>25 <b>specific term, sir.</b></p> <p style="text-align: center;">Page 59</p>	<p>1 THE CHAIRMAN: Thank you.</p> <p>2 MS BLACKWELL: Thank you.</p> <p>3 I now want to move to talk about the application for</p> <p>4 inserting the audio probe into the Audi vehicle. You</p> <p>5 were involved in that, weren't you?</p> <p>6 <b>A. Yes, I was asked to go and give a personal presentation</b></p> <p>7 <b>on that to the Assistant Commissioner Gallan.</b></p> <p>8 Q. I would like to look at an email, please, which appears,</p> <p>9 Mr Coates, at FEO61.</p> <p>10 Thank you.</p> <p>11 This is an email chain relating to the very</p> <p>12 presentation that you have just referred to and I think</p> <p>13 these are, as is usual, in reverse order.</p> <p>14 Could we just go down, please, not to the next page</p> <p>15 but to the email which starts at the bottom of this</p> <p>16 page. We can see it is from you. You, as we know, were</p> <p>17 once known by the cipher FE16 and it is to Tom Manson,</p> <p>18 copying in Mr Turner.</p> <p>19 Who is Tom Manson?</p> <p>20 <b>A. Mr Manson was the chief superintendent, he was the OSU</b></p> <p>21 <b>commander for serious and organised crime -- organised</b></p> <p>22 <b>crime, more than just SCO7.</b></p> <p>23 Q. Right. We will see if we go to page 2, please,</p> <p>24 Mr Coates, the content of what you were sending and it</p> <p>25 is, "As requested".</p> <p style="text-align: center;">Page 60</p>

<p>1 First of all, can you assist us with the purpose of 2 sending this email on the -- I think it is on 3 12 November? 4 <b>A. Yes, obviously we had had the meeting on 10 November.</b> 5 Q. Yes. 6 <b>A. My line manager, Mr Gilmour, asked that I submit 7 a briefing note for Mr Manson's information.</b> 8 Q. Yes. 9 <b>A. That could then be shared with the command chain going 10 one up from Mr Manson, which was Commander Duncan Ball.</b> 11 Q. Right, and where did Pat Gallan fit in? 12 <b>A. She sat above Mr Ball.</b> 13 Q. And this -- I'm so sorry, I am interrupting you. 14 Her authority was ultimately required, wasn't it? 15 <b>A. An officer of that rank was required to give authority 16 for the covert deployment, yes.</b> 17 Q. Let's read through it together: 18 "On Tuesday, 13 October, officers from SCO7 central 19 task force, supported by ARVs from SCO19, initiated 20 an armed stop of a stolen motorcycle in Stamford Hill, 21 N16. Two men were safely arrested for possession of 22 firearms with intent to endanger life and two firearms 23 were recovered, one was a Skorpion sub-machine gun with 24 a fully loaded clip, the other was a semi-automatic 25 pistol with one bullet in the barrel and four in the</p> <p style="text-align: center;">Page 61</p>	<p>1 magazine. Both males were wearing balaclavas, two sets 2 of clothing and the safety catches for the weapons were 3 off. This would appear or they would appear to have 4 been en route to carry out a shooting. The males 5 arrested were Izzet Eren from the Tottenham Turks, who 6 have been involved in a long-running feud with a rival 7 Hackney Turks in recent years, and Erwin Amoyaw-Gyamfi, 8 a Trident nominal. The main individual was Izzet Eren, 9 who was in the UK for a breach of a deportation order. 10 Eren has been the victim of rival shootings and also 11 suspected of the same going back to 2009. There is no 12 intelligence as to who the likely victim was that night. 13 Both were charged with numerous firearms offences, 14 including possession with intent to endanger life. They 15 appeared at Wood Green Crown Court on 29 October where 16 they pleaded guilty to all offences, however the 17 prosecution asked for six weeks to consider a charge of 18 conspiracy to murder." 19 Just pausing there, in fact in the event that charge 20 was not pursued, was it? 21 <b>A. That's correct, it wasn't pursued.</b> 22 Q. Thank you: 23 "The next appearance is 11 December: 24 "Operation Utara is a supported job and intelligence 25 was received on 29 October that a conspiracy was in</p> <p style="text-align: center;">Page 62</p>
<p>1 place to break out Izzet Eren from his prison van en 2 route from Wormwood Scrubs to Wood Green. Izzet was 3 fully involved in the enterprise and the outside team 4 was being led by his brother Ozcan Eren, who is 5 a flagged subject of the operation. One of the gang on 6 the outside pulled out at the last minute and the escape 7 bid has been put back until 11 December." 8 Just pausing there, does that help you identify when 9 you first received intelligence of the aborted escape 10 attempt or is that the date that the information was 11 received by others? 12 <b>A. 29 October was obviously the date of the hearing, so it 13 does assist in relation to when others passed 14 information or indeed I was informed, since a little bit 15 more clarity has come to light since, obviously --</b> 16 Q. Since? 17 <b>A. -- since.</b> 18 Q. You were not suggesting, were you, that the information 19 about the aborted attempt was known prior to it taking 20 place? 21 <b>A. No, definitely not, no.</b> 22 Q. You were not suggesting that: 23 "The intelligence suggested a go bag was prepared 24 and that Ozcan and others were in possession of 25 a firearm and a hammer to duress the guards."</p> <p style="text-align: center;">Page 63</p>	<p>1 Where did that information come from? 2 <b>A. That would have been passed to me by the case officers.</b> 3 Q. Right: 4 "The intelligence also suggested an intention to use 5 a stolen motor vehicle in the commission of the offence. 6 "The operational team have identified that vehicle, 7 an Audi A6 on false plates in a private car park in Wood 8 Green itself." 9 The understanding that you had was that the Audi 10 vehicle that had been identified in a private car park 11 in Wood Green was the vehicle that had been used in the 12 aborted attempt? 13 <b>A. Yes, that is my understanding from the intelligence, 14 yes.</b> 15 Q. Thank you: 16 "Intelligence received only yesterday indicated that 17 this attempt remains scheduled for 11 December. 18 "Our application is to deploy equipment on the Audi 19 to retain control in the first instance and then deploy 20 covert audio equipment to provide evidence of this 21 conspiracy, maximise our chances of recovering a firearm 22 and reducing public risk in the long term." 23 The reason for this application was so that you 24 could obtain evidence of the conspiracy and maximise 25 your chances of recovering a firearm and arresting the</p> <p style="text-align: center;">Page 64</p>



<p>1 offenders?</p> <p>2 <b>A. That is correct, yes.</b></p> <p>3 Q. Right:</p> <p>4 "An early planning meeting has taken place with SFC,</p> <p>5 TFC and SCO19. Whilst there are still three weeks to</p> <p>6 go, the likely tactic which is feasible is to run two</p> <p>7 MASTS operations, one on the prison van and one on the</p> <p>8 Audi. Once sufficiency of evidence was obtained of</p> <p>9 conspiratorial discussions or other intelligence was in</p> <p>10 existence, to intercept the Audi long before the van</p> <p>11 arrived in the vicinity of Wood Green. The MASTS on the</p> <p>12 Serco van would be an additional control measure to</p> <p>13 maximise the safety of the guards and members of the</p> <p>14 public. The MASTS on the prison van would be supported</p> <p>15 by marked ARVs should there be a loss of control and</p> <p>16 therefore a need to disrupt."</p> <p>17 What you were describing was an operation involving</p> <p>18 two MASTS deployments, which are?</p> <p>19 <b>A. Mobile armed support to surveillance.</b></p> <p>20 Q. Right. As you were describing this email, one was to</p> <p>21 attach to the prison van and one was to be focused on</p> <p>22 the Audi?</p> <p>23 <b>A. That's correct, yes.</b></p> <p>24 Q. With the option of having overt officers armed and ready</p> <p>25 to step in, if the prison van or the Audi were either</p> <p style="text-align: center;">Page 65</p>	<p>1 getting too close together or there was sight lost on</p> <p>2 either of them?</p> <p>3 <b>A. That is it, any loss of control, yes.</b></p> <p>4 Q. Okay.</p> <p>5 There is nothing there about the third deployment</p> <p>6 that was eventually part of this plan on Ozcan Eren, is</p> <p>7 there?</p> <p>8 <b>A. No, there isn't.</b></p> <p>9 Q. Do you know why that would be?</p> <p>10 <b>A. I don't actually. That was obviously in our thought</b></p> <p>11 <b>process and it was an omission by me in compilation of</b></p> <p>12 <b>this email.</b></p> <p>13 Q. In the event, although there was a deployment of</p> <p>14 officers following Ozcan Eren, they were not supported</p> <p>15 by a MASTS team, were they?</p> <p>16 <b>A. No, it was an unarmed surveillance operation.</b></p> <p>17 Q. Why was that decision taken, not to include the armed</p> <p>18 officers?</p> <p>19 <b>A. Because our intelligence assessment that Ozcan Eren on</b></p> <p>20 <b>the day would be involved in the command and control of</b></p> <p>21 <b>the plot, and the intelligence we had, which was very</b></p> <p>22 <b>good in relation to his habitual movements, suggested he</b></p> <p>23 <b>was not habitually armed.</b></p> <p>24 Q. He was not habitually armed?</p> <p>25 <b>A. No, as a matter of routine. So there was no specific</b></p> <p style="text-align: center;">Page 66</p>
<p>1 <b>intelligence that he was going to be armed during the</b></p> <p>2 <b>commission of that offence.</b></p> <p>3 Q. Right.</p> <p>4 But you had understood that he had been involved in</p> <p>5 the aborted attempt and in the witness statements that</p> <p>6 we looked at before the break, you had said this:</p> <p>7 "Ozcan Eren represents a significant threat in his</p> <p>8 own right as a criminal within Haringey, with</p> <p>9 intelligence linking him to firearms and the feud with</p> <p>10 their Hackney rivals still very much ongoing. The</p> <p>11 current intelligence regarding the plot to free his</p> <p>12 brother indicating he had access to another firearm."</p> <p>13 <b>A. Yes, he had access. That firearm on that particular day</b></p> <p>14 <b>was used by the conspirators involved in the plot to</b></p> <p>15 <b>free Izzet on 29 October. Our intelligence in relation</b></p> <p>16 <b>to what was planned on 11 December was that he was going</b></p> <p>17 <b>to be used in a command and control capacity. There was</b></p> <p>18 <b>still a potential firearm out there that he had access</b></p> <p>19 <b>to, is my assessment, was that that firearm potentially</b></p> <p>20 <b>could have been used by the conspirators, again, not him</b></p> <p>21 <b>in the command and control vehicle.</b></p> <p>22 Q. But it could have been used by him?</p> <p>23 <b>A. That was my intelligence assessment and that was the</b></p> <p>24 <b>decision that I reached in relation to the overall</b></p> <p>25 <b>application that we made.</b></p> <p style="text-align: center;">Page 67</p>	<p>1 Q. He was somebody who had been stopped in the possession</p> <p>2 of firearms in the past, isn't he?</p> <p>3 <b>A. Yes, there was intelligence linking him to firearms, but</b></p> <p>4 <b>we -- our intelligence around him on a day-to-day basis</b></p> <p>5 <b>was -- led me to believe that we did not need to deploy</b></p> <p>6 <b>a firearms team on him on that day.</b></p> <p>7 Q. Were you aware when you wrote this email that there was</p> <p>8 information from July 2015 that he was carrying a Luger</p> <p>9 firearm?</p> <p>10 <b>A. I don't believe I was aware of that intelligence when I</b></p> <p>11 <b>compiled this email.</b></p> <p>12 Q. Just looking back at the email, please:</p> <p>13 "There will also have to be dialogue with Wood Green</p> <p>14 Crown Court in case there was a change of plan and</p> <p>15 an attempt and effect an escape from the court."</p> <p>16 We will come in a moment to what took place in terms</p> <p>17 of the application for armed officers at Wood Green.</p> <p>18 There is nothing here about speaking to Serco.</p> <p>19 <b>A. No.</b></p> <p>20 Q. I think you have accepted, Mr Williams, that it was</p> <p>21 decided in the meeting on 10 November that they were not</p> <p>22 going to be brought into the loop about this plan.</p> <p>23 <b>A. Yes, if you look at point 3:</b></p> <p>24 <b>"Consideration has been given to an approach to</b></p> <p>25 <b>Serco."</b></p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 Q. I am going to come to that.</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. So "Other issues":</p> <p>4 "Intelligence has been disseminated to the security</p> <p>5 governor at Wormwood Scrubs should Eren feign illness</p> <p>6 and he is removed from the prison by ambulance they have</p> <p>7 contingencies in place."</p> <p>8 You were there referring to an email which had been</p> <p>9 sent on 30 October to the prison, weren't you?</p> <p>10 <b>A. I believe so, yes.</b></p> <p>11 Q. Because the meetings which were going to take place with</p> <p>12 the security governor, Mr Nichols --</p> <p>13 <b>A. Hadn't happened yet.</b></p> <p>14 Q. -- didn't take place until 13 November and then</p> <p>15 8 December, so it's the day following this email:</p> <p>16 "Secondly, DI Rob Murray is meeting the prison</p> <p>17 governor on Friday to brief in full [there we are] and,</p> <p>18 thirdly, consideration has been given to an approach to</p> <p>19 Serco but there are corruption issues and hence this has</p> <p>20 not been done.</p> <p>21 "On the day itself, we will have control of the van</p> <p>22 and the ability to track its movements and communicate</p> <p>23 with the guards."</p> <p>24 <b>A. That's correct, yes.</b></p> <p>25 Q. Thank you:</p> <p style="text-align: center;">Page 69</p>	<p>1 "Risk: clearly there are various opportunities to</p> <p>2 deal with this threat, eg ..."</p> <p>3 Then you list the three opportunities which we have</p> <p>4 been through:</p> <p>5 "However, these will not address the issue in the</p> <p>6 long term as a potential break from custody at some</p> <p>7 stage in the future. Izzet Eren will decamp to Turkey</p> <p>8 or Northern Cyprus. Secondly, there is now a real</p> <p>9 opportunity to take out Ozcan Eren and other associates</p> <p>10 and remove the threat they pose. Ozcan Eren is</p> <p>11 a significant player himself and a supplier of firearms</p> <p>12 and drugs on Haringey."</p> <p>13 Next page, please:</p> <p>14 "We have recovered another three in the last month</p> <p>15 on this Operation."</p> <p>16 What was that a reference to?</p> <p>17 <b>A. That was a reference to Operation Utara.</b></p> <p>18 Q. Right. Is that a reference to the firearms that were</p> <p>19 seized during the arrest of Izzet Eren and</p> <p>20 Erwin Amoyaw-Gyamfi?</p> <p>21 <b>A. I don't believe so. I believe that refers to Operation</b></p> <p>22 <b>Utara in the whole, which I am sure Mr Murray explained</b></p> <p>23 <b>this to you the other day, quite a cross hybrid of</b></p> <p>24 <b>nominals within a wider organised crime group and not</b></p> <p>25 <b>specifically linked to the Operation Ankaa conspiracy</b></p> <p style="text-align: center;">Page 70</p>
<p>1 <b>and I believe that comment refers to other firearms</b></p> <p>2 <b>deployments that we had made on a near daily basis,</b></p> <p>3 <b>sadly, and we had recovered three firearms.</b></p> <p>4 Q. Could we just go back to the bottom of the previous</p> <p>5 page, please.</p> <p>6 I am just going to read this paragraph again,</p> <p>7 because it rather sounds as if you are referring to</p> <p>8 firearms in conjunction with Ozcan Eren:</p> <p>9 "Secondly, there is now a real opportunity to take</p> <p>10 out Ozcan Eren and other associates and remove the</p> <p>11 threat they pose."</p> <p>12 You are talking about taking out Ozcan Eren and his</p> <p>13 connection with the proposed prison break of Izzet Eren,</p> <p>14 aren't you?</p> <p>15 <b>A. Yes, in relation to that comment, yes.</b></p> <p>16 Q. "We have recovered another three in the last month on</p> <p>17 this operation. He is clearly in possession of another</p> <p>18 firearm, which we have a duty to recover."</p> <p>19 You see, you appear to be saying in this email that</p> <p>20 your information was that Ozcan Eren was in possession</p> <p>21 of a firearm at least.</p> <p>22 <b>A. Yes, perhaps the more correct terminology of that would</b></p> <p>23 <b>be "he has access to". And in relation to the other</b></p> <p>24 <b>firearms that we have taken out, what I am referring to</b></p> <p>25 <b>there is that within the wider Utara organised crime</b></p> <p style="text-align: center;">Page 71</p>	<p>1 <b>group operation, that there are firearms available in</b></p> <p>2 <b>circulation and we have recovered three in the last</b></p> <p>3 <b>month, so they do have access to potentially firearms on</b></p> <p>4 <b>a fairly ready basis.</b></p> <p>5 THE CHAIRMAN: It is slightly misleading, is it not?</p> <p>6 <b>A. Yes, I could have worded that better, sir.</b></p> <p>7 THE CHAIRMAN: How should you have worded it?</p> <p>8 <b>A. As I have just said, that "Ozcan Eren has access ..."</b></p> <p>9 THE CHAIRMAN: Has access to?</p> <p>10 <b>A. Has access to.</b></p> <p>11 <b>It is slightly misleading to suggest that he is in</b></p> <p>12 <b>regular possession and routinely carries a firearm.</b></p> <p>13 <b>I think it is incorrect in that.</b></p> <p>14 THE CHAIRMAN: Yes.</p> <p>15 MS BLACKWELL: Thank you.</p> <p>16 I would just like to press you, once more, please,</p> <p>17 on the decision not to bring Serco into the loop, and</p> <p>18 you have set out here, as you have told us today, that</p> <p>19 the reason for that was concerns over corruption within</p> <p>20 the organisation.</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Are you able to provide the inquiry with details or</p> <p>23 examples of what it was that concerned you?</p> <p>24 <b>A. I can't give you anything specific, I am afraid. It was</b></p> <p>25 <b>a sad fact that was well known with the organised crime</b></p> <p style="text-align: center;">Page 72</p>

1 **command, that Serco had issues, corruption wise,**  
 2 **particularly around criminal justice matters and**  
 3 **obviously this was a covert operation, we did not wish**  
 4 **to jeopardise that. And I can't give you any specifics,**  
 5 **I can't give you any specifics that they had any links**  
 6 **in relation to organised crime links to the Erens or**  
 7 **Haringey or -- it was a general condition that we felt**  
 8 **was in existence and we were not prepared to jeopardise**  
 9 **this covert operation by including them in it.**  
 10 Q. Right. Thank you.  
 11 Because in not conferring with Serco, in not warning  
 12 them of what was going ahead, or what you understood was  
 13 to be planned on the morning of 11 December, you were  
 14 not able to identify the van that was going to be used  
 15 until the morning, were you?  
 16 **A. That's correct. Yes.**  
 17 Q. You were not able to identify until that morning the  
 18 route that the van was going to take?  
 19 **A. That's correct, that is my understanding, yes.**  
 20 Q. Had you had a dialogue with Serco, your ability to place  
 21 surveillance officers at appropriate points along that  
 22 route would have been significantly improved, wouldn't  
 23 it?  
 24 **A. If we knew the specific route, yes, that would have been**  
 25 **improved, yes.**

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1 Q. Yes, all right, thank you.  
 2 But you have given your explanation as to why that  
 3 wasn't done.  
 4 In allowing the van to leave the prison, driven and  
 5 guarded by Serco employees, you allowed there to be  
 6 a risk to their safety as well, didn't you?  
 7 **A. Yes, there was a risk, yes.**  
 8 Q. Did you consider throughout the course of the planning  
 9 for this operation replacing the Serco guards with  
 10 police officers?  
 11 **A. That was not a consideration that I undertook during**  
 12 **this, the planning of this operation, no.**  
 13 Q. Does that mean that it didn't occur to you?  
 14 **A. It didn't occur to me.**  
 15 Q. Right.  
 16 Do you stand by the decision not to include Serco in  
 17 your negotiations in the run up --  
 18 **A. Yes. Yes, I do. Yes.**  
 19 Q. Let's go up to the first page, again, please, Mr Coates,  
 20 and see the response.  
 21 THE CHAIRMAN: What did you mean by the phrase "On the day  
 22 of the ..." Just going back on that, to the last  
 23 document, please.  
 24 MS BLACKWELL: Can we go to page 4, please.  
 25 THE CHAIRMAN: I have made a note of it, actually:

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1 Q. You could have ensured that there was no prospect of  
 2 losing sight of the van, couldn't you, had you known the  
 3 route in advance?  
 4 **A. I don't think I could give an assurance that we**  
 5 **wouldn't --**  
 6 Q. Fair enough.  
 7 THE CHAIRMAN: You could have reduced the risk?  
 8 **A. Absolutely right, sir.**  
 9 THE CHAIRMAN: Yes.  
 10 MS BLACKWELL: And therefore reduced the risk of the Audi  
 11 vehicle coming into contact with it?  
 12 If you knew in advance the route the van was going  
 13 to take, you could have put significant safeguards in  
 14 place to ensure --  
 15 **A. We could have improved it, I would say in relation to**  
 16 **the Audi coming into contact with it, slightly. But**  
 17 **obviously we had other contingencies to prevent that**  
 18 **ever happening.**  
 19 Q. I understand that.  
 20 **A. Yes.**  
 21 Q. In fact, as you agreed with me this morning, there was  
 22 a possibility that the Audi wouldn't even be used?  
 23 **A. Exactly, there was a possibility, and possibility it**  
 24 **wasn't going to be used as a mission vehicle, maybe in**  
 25 **another capacity.**

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1 "On the day itself we will have control of the van  
 2 and the ability to track its movements."  
 3 **A. Once we --**  
 4 THE CHAIRMAN: How could you have control of the van if your  
 5 people were not driving the vehicle.  
 6 **A. I believe we had some sort of facility with the prison**  
 7 **service in relation to being able to track the location**  
 8 **of that van. Whether that was -- I think that was**  
 9 **independent of the ... I am speculating, sorry. I think**  
 10 **we had some sort of capacity to track the movement of**  
 11 **that vehicle and maybe communicate with the guards on**  
 12 **the day, if we needed to.**  
 13 MS BLACKWELL: Right, so what did you mean by "on the day  
 14 itself we will have control"? You would have --  
 15 **A. I am talking about surveillance control.**  
 16 Q. So you would have it in your sights?  
 17 **A. Yes.**  
 18 Q. And, if necessary, you would have the ability to  
 19 therefore track its movements by your officers?  
 20 **A. Yes and, again, I am being a little bit speculative in**  
 21 **this answer but I think there was an ability to track**  
 22 **the vehicle. Some sort of tracking ability.**  
 23 THE CHAIRMAN: Perhaps not the best choice of words, to say  
 24 you would have control of the van?  
 25 MR BUTT: Sir, I hesitate to rise, "control" is normally

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<p>1 used to mean surveillance and a means of tracking or 2 watching or monitoring. 3 THE CHAIRMAN: Very good. 4 Thank you very much for helping with that, Mr Butt, 5 thank you. 6 MS BLACKWELL: It wouldn't relate to a tracking device, 7 would it, because you would not be able to use 8 a tracking device on the van without the consent and 9 knowledge of Serco? 10 <b>A. It certainly wasn't a tracking device that we would 11 deploy on it, no.</b> 12 Q. Had you wanted to use such a device, you would have had 13 to engaged with Serco and brought them into the circle 14 of trust? 15 <b>A. Probably, yes.</b> 16 Q. Yes. 17 THE CHAIRMAN: Thank you. 18 MS BLACKWELL: Thank you. 19 I was going to go back up to the first page of this 20 email -- 21 THE CHAIRMAN: Sorry, I interrupted your thread. 22 MS BLACKWELL: Not at all, sir. 23 Duncan Ball's response, which came in about four 24 hours after you had sent this email: 25 "Thanks [your name] looks a good job. The AC will</p> <p style="text-align: center;">Page 77</p>	<p>1 be interested in the other options to manage the risk, 2 so, as you have done here, it would be good to be in 3 a position to outline the pros and cons to her and the 4 plan over the next three weeks to gather evidence, 5 et cetera. We would be grateful for a face-to-face 6 meeting next week." 7 That is what you were referring to when you said 8 that there was a need to brief Pat Gallan? 9 <b>A. Yes. Obviously he would obviously be speaking to her 10 also on a regular basis, as part of his sort of command 11 chain and so she could have been updated through that 12 medium as well, but also the actual application for the 13 intrusive surveillance, yes.</b> 14 Q. What were your plans over the next three weeks to gather 15 evidence? 16 <b>A. First and foremost, to try and identify who the 17 conspirators were.</b> 18 Q. Yes. 19 <b>A. Could we identify any location of firearms. We wanted 20 to try and identify specifically what method was going 21 to be used, because obviously that has an impact upon 22 the tactical planning.</b> 23 Q. Method of what? 24 <b>A. How they were actually going to physically attack the 25 van --</b></p> <p style="text-align: center;">Page 78</p>
<p>1 Q. Right? 2 <b>A. -- and place the guards under duress, how they were 3 going to carry it out, how many vehicles might be 4 involved for example, was there any location of the 5 vehicles, other than the Audi, that we could identify?</b> 6 Q. Right. 7 <b>A. One of the other reasons obviously for trying to put the 8 covert deployment in the Audi is that we might have been 9 offered opportunities if the vehicle was moving on 10 a regular basis, with the conspirators in it, for 11 example carrying out reconnaissance or dry runs --</b> 12 Q. Yes. 13 <b>A. -- to obtain conspiratorial evidence long before 14 11 December, which potentially would have given us other 15 arrest opportunities before 11 December and therefore 16 negated the necessity to deploy on that day.</b> 17 <b>We also explored opportunities around the prison for 18 intelligence and evidence gathering opportunities around 19 there.</b> 20 Q. Right. 21 <b>A. Liaising with our colleagues at the NCA, who were 22 obviously an important intelligence source in relation 23 to this operation for them to try and develop that 24 intelligence or identify conspirators. We could then 25 deploy surveillance wise to try and turn that</b></p> <p style="text-align: center;">Page 79</p>	<p>1 <b>intelligence into actionable information and evidence.</b> 2 Q. Right. So -- 3 <b>A. So a variety of measures.</b> 4 Q. A variety of measures, as you have explained. 5 <b>A. Yes.</b> 6 Q. One of which was to seek to identify those who were 7 going to carry out the attack on the prison guards? 8 <b>A. That's correct.</b> 9 Q. Which in the event you were not able to do? 10 <b>A. We were not able to do that, no.</b> 11 Q. Nor were you able to identify the manner in which the 12 attack was going to take place? 13 <b>A. That's correct.</b> 14 Q. Nor were you able to identify the specific place on the 15 route of the van that the attack was going to take 16 place? 17 <b>A. That's correct.</b> 18 Q. Although you identified the vehicle, we know that from 19 this email, and you will be aware that there was 20 a static camera installed in the car park, there were 21 difficulties with that camera, weren't there? 22 <b>A. I can't recall specifically.</b> 23 Q. Let me attempt to assist you. 24 <b>A. Thank you.</b> 25 Q. It did not work in the hours of darkness. You couldn't</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 see what was going on in the hours of darkness.</p> <p>2 <b>A. That's correct, yes.</b></p> <p>3 Q. All right.</p> <p>4 Although I think in terms of the other aspect of the</p> <p>5 planning that you have mentioned, you were able to</p> <p>6 identify certain vehicles connected to Ozcan Eren and</p> <p>7 his associates. As of the morning of 11 December, you</p> <p>8 did not know which of those vehicles may be involved in</p> <p>9 this attack?</p> <p>10 <b>A. No.</b></p> <p>11 Q. On 13 November, the day after this email was sent,</p> <p>12 Mr Murray went to Wormwood Scrubs prison to meet</p> <p>13 Governor Nichols.</p> <p>14 He was the SIO?</p> <p>15 <b>A. That's correct. Yes.</b></p> <p>16 Q. What he was speaking to Governor Nichols about was the</p> <p>17 departure of the van on the morning and a request to the</p> <p>18 governor that Mr Murray be told as soon as possible,</p> <p>19 firstly, the identification of the van that was going to</p> <p>20 take Izzet Eren to court and, secondly, the route that</p> <p>21 the van was going to take?</p> <p>22 Are you agreeing with me?</p> <p>23 <b>A. Sorry, yes, I do agree, I had something in my eye and</b></p> <p>24 <b>I wasn't sure you had finished, sorry.</b></p> <p>25 Q. Sorry.</p> <p style="text-align: center;">Page 81</p>	<p>1 That was the reason for bringing the governor of the</p> <p>2 prison into your confidence about the plan, that you</p> <p>3 needed them, because you needed to know as soon as</p> <p>4 possible the registration of the van and the route?</p> <p>5 <b>A. We needed to include them, but we also needed to -- this</b></p> <p>6 <b>was more important -- inform them of what we were</b></p> <p>7 <b>intending and get their acquiescence to it.</b></p> <p>8 <b>The same with the courts, if Mr Nichols and the</b></p> <p>9 <b>prison had said, "We are not happy with this, we don't</b></p> <p>10 <b>want it happening", we couldn't have done it.</b></p> <p>11 <b>I am sure we are going to go on to the court</b></p> <p>12 <b>situation in further detail, but if we could not provide</b></p> <p>13 <b>the security to the courts that we thought was necessary</b></p> <p>14 <b>to conduct this operation safely, then we could not have</b></p> <p>15 <b>done it.</b></p> <p>16 Q. So you needed their acquiescence or approval?</p> <p>17 <b>A. Their acquiescence, yes, but having got that, obviously</b></p> <p>18 <b>particularly in relation to the prison, they could</b></p> <p>19 <b>assist with information.</b></p> <p>20 Q. Yes.</p> <p>21 You would need to know before it set off the</p> <p>22 registration number of the van, in order to be able to</p> <p>23 follow it, wouldn't you?</p> <p>24 <b>A. It would be somewhat embarrassing if we got the wrong</b></p> <p>25 <b>van.</b></p> <p style="text-align: center;">Page 82</p>
<p>1 Q. Yes, I mean dangerous if you were following the wrong</p> <p>2 van.</p> <p>3 <b>A. Hmm.</b></p> <p>4 Q. Were you aware that the video-link option --</p> <p>5 I appreciate that had already been discussed and</p> <p>6 dismissed by this time, but were you aware that, in</p> <p>7 fact, at the time in December 2015, Wormwood Scrubs</p> <p>8 could not offer a video-link facility for a sentencing</p> <p>9 hearing?</p> <p>10 <b>A. I don't specifically recall that, sorry.</b></p> <p>11 Q. No.</p> <p>12 If that is something which Mr Murray was told during</p> <p>13 the course of this meeting with Governor Nichols, would</p> <p>14 you have expected him to tell you?</p> <p>15 <b>A. I would have thought he would have told me.</b></p> <p>16 Q. All right. Because although video-link appears as</p> <p>17 an option that is being rejected on the FA2 forms which</p> <p>18 you completed, there is no reference to the fact that it</p> <p>19 wasn't an option really because Wormwood Scrubs didn't</p> <p>20 offer that facility.</p> <p>21 <b>A. Yes, if -- I am sure if I was aware of that, I would</b></p> <p>22 <b>have included it on the FA2.</b></p> <p>23 Q. Yes.</p> <p>24 Do you think that it was important for Governor</p> <p>25 Nichols to understand that, not only was there a plan to</p> <p style="text-align: center;">Page 83</p>	<p>1 spring Mr Eren on 11 December, but there had been</p> <p>2 an aborted attempt on 29 October?</p> <p>3 <b>A. Yes, I would agree with that, because obviously we were</b></p> <p>4 <b>dealing with long-term risk and obviously this is</b></p> <p>5 <b>a second attempt, which is indicative of a long-term</b></p> <p>6 <b>intention of Mr Izzet Eren to escape.</b></p> <p>7 Q. Why didn't you go to the meeting with Governor Nichols</p> <p>8 on 13 November?</p> <p>9 <b>A. Probably, coming back to the separation of roles and</b></p> <p>10 <b>I was not the SIO of the operation, and although I dealt</b></p> <p>11 <b>with the courts, that was the sort of secondary</b></p> <p>12 <b>consideration and Rob Murray took responsibility for</b></p> <p>13 <b>doing that.</b></p> <p>14 Q. You don't consider that it was the job of the tactical</p> <p>15 firearms commander to go to the governor of the prison</p> <p>16 and speak to them about the tactics that were going to</p> <p>17 be employed in relation to armed deployment?</p> <p>18 <b>A. It is something potentially I could have done.</b></p> <p>19 Q. Yes.</p> <p>20 <b>A. I could have done. As I say, Rob took responsibility</b></p> <p>21 <b>for that and I didn't consider that it was something</b></p> <p>22 <b>that I needed to usurp him, if that is the correct word,</b></p> <p>23 <b>and do that. I had confidence in his ability to do</b></p> <p>24 <b>that.</b></p> <p>25 Q. Thank you.</p> <p style="text-align: center;">Page 84</p>

21 (Pages 81 to 84)

<p>1 On 26 November, an application was made for -- I may 2 be pronouncing this wrong, is it CATO funding? 3 <b>A. CATO funding.</b> 4 Q. What is that, please? 5 <b>A. CATO, like all public resourcing nowadays, particularly</b> 6 <b>in 2015, the height of austerity, resources and funding</b> 7 <b>are scarce and operational teams such as ours obviously</b> 8 <b>needed resources, not just in terms of financial, to pay</b> 9 <b>overtime but central assets, such as the TSU, could make</b> 10 <b>bids to the CATO office -- and, forgive me I forget what</b> 11 <b>CATO stands for, I won't even guess, but basically some</b> 12 <b>sort of ... I might even have got it right, coordinating</b> 13 <b>and tasking office, basically could make decisions to</b> 14 <b>release extra funding so you could basically carry out</b> 15 <b>those operations.</b> 16 Q. Was the application successful? 17 <b>A. Yes. I believe it was, yes.</b> 18 Q. That was necessary in order to ensure that all of the 19 officers who were required for this operation were 20 covered, in terms of pay? 21 <b>A. For example SCO7, we had our budget, 35 had their</b> 22 <b>budget, when we asked for their assets, their management</b> 23 <b>would say, "How am I going to pay for it? You are going</b> 24 <b>to need to pay for it". How are we going to pay for it?</b> 25 <b>We would go to CATO and get the funding to pay for it.</b></p> <p style="text-align: center;">Page 85</p>	<p>1 Q. Right. 2 How many officers were involved in this operation on 3 the morning of 11 December? 4 <b>A. I couldn't give you a definitive -- I would think in</b> 5 <b>excess of 100 in terms of police officers and police</b> 6 <b>staff.</b> 7 Q. Right. That would include the surveillance officers, 8 the MASTS deployment, those involved in C3000 -- 9 <b>A. Yes.</b> 10 Q. -- and support staff? 11 <b>A. That's correct, yes.</b> 12 Q. Over 100 officers? 13 <b>A. That is my estimate, yes.</b> 14 Q. Right. 15 There was another meeting described by various 16 people as a planning meeting on 3 December? 17 <b>A. That's correct, yes.</b> 18 Q. You refer to it in your witness statement? 19 <b>A. I do, yes.</b> 20 Q. You didn't make any notes at the meeting? 21 <b>A. No. My position was the same as on 10 November, in</b> 22 <b>relation to that.</b> 23 Q. Others did make notes? 24 <b>A. That's correct.</b> 25 Q. Including Mr Murray?</p> <p style="text-align: center;">Page 86</p>
<p>1 <b>A. Yes.</b> 2 Q. We have looked at those notes before, so I am not going 3 to take us to them now, but what developments were made 4 in the plan during the course of that meeting? 5 <b>A. For me, as the tactical firearms commander, the primary</b> 6 <b>purpose of that meeting was to discuss with Mr Turner</b> 7 <b>whether the deployment of the covert listening equipment</b> 8 <b>into the Audi should be supported by SCO19 firearms</b> 9 <b>officers as a safety contingency.</b> 10 Q. That would have required its own system of 11 application -- 12 <b>A. Totally separate operational application.</b> 13 Q. That is what happened, isn't it? 14 <b>A. That's correct, yes.</b> 15 Q. Yes. 16 <b>A. Obviously we had to consider the risk to the operatives</b> 17 <b>deploying the equipment and the decision was made on the</b> 18 <b>basis that there was unknown threat from</b> 19 <b>associates/potential conspirators who may have had</b> 20 <b>a sight of that vehicle that they could have been</b> 21 <b>challenged and we needed to be in a position to protect</b> 22 <b>the operatives deploying the equipment.</b> 23 Q. When the meeting has concluded on 3 December, had it 24 been agreed that you would apply for armed support for 25 that deployment?</p> <p style="text-align: center;">Page 87</p>	<p>1 <b>A. It was agreed, yes.</b> 2 Q. You then set about filling in the FA2 form? 3 <b>A. That's correct, yes.</b> 4 Q. You have accepted, and indeed you have set it out in 5 a witness statement for the purposes of this inquiry, 6 that in relation to the deployment on 8 December and on 7 11 December, there was no FA1 form completed. 8 <b>A. That's correct, yes.</b> 9 Q. Can you explain what the FA1 form is, please, and also 10 why you decided on these occasions not to complete one? 11 <b>A. Yes.</b> 12 <b>So perhaps a good example of the purpose the FA1 is</b> 13 <b>to refer back to the events of 13 October, if that was</b> 14 <b>not going to be a spontaneous operation, so --</b> 15 Q. Yes. 16 <b>A. -- say, for example, DC Kinch contacted me and said,</b> 17 <b>"There is going to be an exchange of firearms in Craven</b> 18 <b>Park Road, but it is going to be tomorrow".</b> 19 <b>I would have asked him to complete an FA1 with the</b> 20 <b>intelligence update. That basically is an application</b> 21 <b>to me as a tactical firearms commander to consider</b> 22 <b>whether I would support that. It gives me</b> 23 <b>an opportunity to conduct a threat assessment, identify</b> 24 <b>intelligence gaps that I would want filled before I then</b> 25 <b>made a formal application as a tactical firearms</b></p> <p style="text-align: center;">Page 88</p>

<p>1 commander to a strategic firearms commander for 2 authorisation for the operation.</p> <p>3 When it came to the application for deployment on 4 11 December, and also the 8 December deployment for the 5 covert installation, I took the view that that form was 6 not necessary to complete, because (a) I was already 7 aware of the situation, it wasn't a case of somebody 8 ringing me up with fresh information, I was aware of it 9 all and it seemed duplicatory and unnecessary to 10 complete, effectively telling myself something which 11 I already knew.</p> <p>12 Q. That you already knew.</p> <p>13 A. Which I already knew.</p> <p>14 Q. So that explains why you didn't do it.</p> <p>15 A. Yes.</p> <p>16 Q. But you knew that, unless this was -- or either of these 17 two deployments were spontaneous deployments, you were 18 under a duty to fill it in?</p> <p>19 A. Whether I was under a duty or not, I am not sure. To be 20 honest -- I didn't feel it was necessary to fill it in. 21 Anything that would have been on there, would have been 22 duplicated on the FA2 and essentially I was trying to 23 reduce bureaucracy, not trying to mislead anybody. It 24 was an administrative form that was unnecessary in my 25 opinion and in terms of whether that was a duty that</p> <p style="text-align: center;">Page 89</p>	<p>1 I was under, I would have to make reference to the 2 policies and the protocols. But in terms of 3 practicalities, I didn't see the need to do it, and that 4 may well be wrong, I am sure that will be pointed out if 5 I am, but that is the reason I didn't do it.</p> <p>6 Q. I understand that.</p> <p>7 But without an FA1 there was an incomplete audit 8 trail for this application?</p> <p>9 A. If that is the case, yes, it was an incomplete audit 10 trail of the FA forms, yes.</p> <p>11 Q. Let's take a look at the FA2 form that you did complete.</p> <p>12 Mr Coates, may we go to IPC1080, page 2, thank you.</p> <p>13 Can you assist us, please, Mr Williams as to how 14 these forms are completed. Presumably there are blank 15 forms, are there, kept on your computer drive that you 16 are able to access. You don't have to create the 17 document from scratch each time?</p> <p>18 A. No. No, luckily they are blank documents that you can 19 open and start.</p> <p>20 Q. Are there dropdown boxes, are there options for some of 21 the information that you need to input or is it a case 22 of having to complete each box --</p> <p>23 A. I don't believe there are dropdown boxes on these forms.</p> <p>24 Q. Right, okay.</p> <p>25 This is the first page of the document that you have</p> <p style="text-align: center;">Page 90</p>
<p>1 completed on 4 December, we can see that from the top 2 left-hand corner.</p> <p>3 A. I can, yes.</p> <p>4 Q. What is Operation Morguld?</p> <p>5 A. Where --</p> <p>6 Q. In the middle, just under the title.</p> <p>7 A. I can't assist you with that, I am afraid.</p> <p>8 Q. Is that a different operation?</p> <p>9 A. Clearly is a totally different operation and why that is 10 on there, that is not my document, it is the tactical 11 firearms commander, isn't it? Oh yes, sorry, it is 12 mine. I can't assist you with that, sorry.</p> <p>13 Q. Do you think you may have used a document that had been 14 completed for a different operation and cut and pasted 15 from that?</p> <p>16 A. Clearly there may well be an element of cut and paste 17 there. I don't remember that operational name, sorry.</p> <p>18 Q. All right.</p> <p>19 THE CHAIRMAN: I think we should assume that, unless anybody 20 tells us to the contrary.</p> <p>21 A. Yes.</p> <p>22 THE CHAIRMAN: Do you agree, Mr Butt?</p> <p>23 MR BUTT: Sorry, sir?</p> <p>24 THE CHAIRMAN: Do you agree that in the absence of any 25 information to the contrary, we should assume that the</p> <p style="text-align: center;">Page 91</p>	<p>1 reference to Operation Morguld is a result of a cut and 2 paste?</p> <p>3 MR BUTT: Of Operation Morguld?</p> <p>4 THE CHAIRMAN: Of whatever, a cut and paste?</p> <p>5 MR BUTT: It would seem that that has previously been placed 6 on the form and has not been removed.</p> <p>7 THE CHAIRMAN: Yes.</p> <p>8 So the answer I think is yes, you agree?</p> <p>9 MR BUTT: Yes.</p> <p>10 THE CHAIRMAN: Thank you.</p> <p>11 MS BLACKWELL: I am helpfully assisted by my learned friend 12 Mr Moss. Apparently Operation Morguld was a Baker 13 Street bank robbery. Does that ring any bells?</p> <p>14 Is that something that you were involved in?</p> <p>15 A. Not personally, no.</p> <p>16 Q. Do you know of it?</p> <p>17 A. Well, I am aware of a very famous Baker Street bank 18 robbery but it probably predated FA2s. Obviously I used 19 to work on the Flying Squad, which was involved in armed 20 robberies --</p> <p>21 THE CHAIRMAN: Do you know what Operation Morguld was?</p> <p>22 A. I can't recall, sir.</p> <p>23 THE CHAIRMAN: If it was a bank robbery, when it took place?</p> <p>24 A. I can't recall, sir.</p> <p>25 THE CHAIRMAN: Thank you.</p> <p style="text-align: center;">Page 92</p>

23 (Pages 89 to 92)

<p>1 MS BLACKWELL: Can we have the next page, please. 2 These forms follow the direction of the national 3 decision model, don't they, so they have sections which 4 reflect the aspects of the national decision model that 5 should be considered in relation to each decision made? 6 <b>A. That's correct, yes.</b> 7 Q. Yes. 8 The first section relates to information or 9 intelligence and here you have set out the following: 10 "Operation Ankaa is a proactive operation being 11 conducted by the central task force at Barking in 12 response to reliable intelligence that there is 13 an ongoing conspiracy to assist Izzet Eren from escaping 14 from custody on Friday, 11 December when due to appear 15 at Wood Green Crown Court. Intelligence indicates that 16 those engaged in this criminal conspiracy have access to 17 a stolen vehicle for use in the commission of this 18 offence and also have access to firearms for the same 19 purpose. 20 "The operational team have identified this vehicle 21 [the Audi vehicle that is the subject of this 22 application] a lost or stolen Audi A6, which has been 23 parked in an off-street car park in Eastern Road, Wood 24 Green N22. 25 "That vehicle is currently displaying false</p> <p style="text-align: center;">Page 93</p>	<p>1 registration plates ... to assist the operational 2 response to this threat, authority has been granted 3 under a separate authority to deploy covert equipment on 4 this vehicle." 5 Just pausing there, what was the authority that had 6 already been granted in relation to the vehicle? 7 <b>A. That's the intrusive surveillance and deployment of the 8 covert audio.</b> 9 <b>This was an application for firearms support.</b> 10 Q. Right. 11 As far as you were aware, had that application for 12 the insertion of the probe device been granted by 13 4 December? 14 <b>A. That is my understanding, yes.</b> 15 Q. "This deployment will be conducted in situ during 16 daylight hours by unarmed TSU operatives, supported by 17 unarmed surveillance officers from the central task 18 force. Whilst surveillance will be conducted on 19 Ozcan Eren, who is the organiser of this escape plot, to 20 ensure he is under control, the identity and location of 21 other co-conspirators is unknown and therefore the same 22 applies as to their risk. 23 "The Erens represent the Tottenham side of the 24 long-running feud with the rival Hackney Turks, which 25 has seen numerous shooting and murders dating back to</p> <p style="text-align: center;">Page 94</p>
<p>1 2009 in both London and Turkey. 2 "Intelligence this week has indicated that 3 Sinan Ozger has been engaged in the movement and 4 safekeeping of firearms and it was Ozger who performed 5 the same function prior to Izzet Eren's arrest in 6 possession of a loaded Skorpion sub-machine gun on 7 13 October. I have reviewed the intelligence threat 8 assessment and strategy in line with the NDM and I take 9 the view that the rationale for the deployment of 10 a limited firearms contingency has been met, in that 11 I have grounds to suspect that the subjects and 12 associates will have possession of firearms or immediate 13 access to firearms. 14 "I have reviewed whether there are any other 15 operational opportunities currently available to 16 effectively respond to this intelligence and remove the 17 threat prior to the deployment and there are none." 18 What other operational opportunities had you 19 considered in terms of effectively responding to the 20 intelligence which you had received? 21 <b>A. Obviously this was an application for armed support to 22 the deployment of the audio equipment. I have 23 considered what -- are there any other operational 24 opportunities to remove risk to the operatives.</b> 25 Q. Yes.</p> <p style="text-align: center;">Page 95</p>	<p>1 <b>A. But unfortunately that risk was unknown, the location of 2 any conspirators that may have sight of that vehicle and 3 be in communication with Ozcan Eren or other main 4 conspirators of the escape plan we were unable to 5 assess. So the only option was available to me was for 6 armed support for that deployment, to manage the threat, 7 albeit that was unknown.</b> 8 Q. All right. Thank you. 9 If we go to the next page, please, and the next 10 page -- thank you. 11 Still with information/intelligence, we have 12 a specific item listed here: 13 "Sinan Ozger was arrested on 22/11/2013 in 14 possession of a gun. On 14/10/2013 he was arrested for 15 possessing ammo and the supply of class A drugs. 16 "Intent, not known at present. Vulnerable person, 17 no known issues. Identity: other subjects remain 18 unknown." 19 Was there no more up-to-date intelligence about 20 Sinan Ozger than that which had been received by the 21 Metropolitan Police two years prior to this application 22 being made? 23 <b>A. Well, yes, there was, I think I refer to it in the body 24 of the application. And also on -- which I repeated 25 I think on the FA2 for the deployment on 11 December,</b></p> <p style="text-align: center;">Page 96</p>

24 (Pages 93 to 96)



<p>1 <b>there was more current intelligence and that was around</b></p> <p>2 <b>the end of November, so a week or so before this</b></p> <p>3 <b>deployment.</b></p> <p>4 Q. Why wasn't that placed on here?</p> <p>5 <b>A. I wouldn't be able to answer that in this current</b></p> <p>6 <b>session.</b></p> <p>7 Q. Right. Well then we may have to discuss it at another</p> <p>8 time.</p> <p>9 THE CHAIRMAN: Yes.</p> <p>10 MS BLACKWELL: Next page, please.</p> <p>11 Next page. Threat and risk, so this is the next</p> <p>12 part of the national decision model:</p> <p>13 "The threat is unknown, as the identity and location</p> <p>14 of other conspirators is not known. However, this OCG</p> <p>15 have access to firearms and a propensity to discharge</p> <p>16 against rival groups.</p> <p>17 There a requirement for an armed contingency to</p> <p>18 support the TSU going forward to deploy on the Audi,</p> <p>19 although there is no specific intelligence that they are</p> <p>20 likely to be subject of any threat."</p> <p>21 Those two sentences that appear in that threat and</p> <p>22 risk box, is that the extent of the threats that you</p> <p>23 considered may be apparent in relation to this</p> <p>24 deployment?</p> <p>25 <b>A. Absolutely, yes.</b></p> <p style="text-align: center;">Page 97</p>	<p>1 Q. "Identified individuals/groups at risk:</p> <p>2 "General public, TSU engineers, police officers</p> <p>3 (unarmed), police officers (armed)."</p> <p>4 Again, were you there identifying those to whom</p> <p>5 a risk may be posed?</p> <p>6 <b>A. I was, yes.</b></p> <p>7 Q. Thank you.</p> <p>8 Next page, please.</p> <p>9 Still under threat and risk:</p> <p>10 "There is no specific intelligence that any armed</p> <p>11 offence will be committed. There is no intelligence to</p> <p>12 suggest that the subjects are routinely armed and it is</p> <p>13 not anticipated that there will be direct and continuous</p> <p>14 monitoring of the Audi during the deployment."</p> <p>15 What did that last part of the second sentence mean,</p> <p>16 "It is not anticipated there will be direct and</p> <p>17 continuous monitoring of the Audi during the</p> <p>18 deployment"?</p> <p>19 <b>A. We did not anticipate that there would be somebody with</b></p> <p>20 <b>constant vision monitoring the vehicle.</b></p> <p>21 Q. From your perspective?</p> <p>22 <b>A. No, from the OCG's perspective.</b></p> <p>23 Q. Right, I understand.</p> <p>24 If we can go to page 14, please, of the document,</p> <p>25 threat and risk:</p> <p style="text-align: center;">Page 98</p>
<p>1 "Overarching principles: the overarching principle</p> <p>2 is preservation of life and protection of the public,</p> <p>3 police and any unknown subjects. The aim is to protect</p> <p>4 the public in the most appropriate method, balancing the</p> <p>5 risk of harm to the public in the short and longer</p> <p>6 term."</p> <p>7 "What did you mean by that?"</p> <p>8 <b>A. Well, in relation to the harm to the public in the short</b></p> <p>9 <b>term, is that -- should there be any member of the</b></p> <p>10 <b>public also in the immediate vicinity of that vehicle</b></p> <p>11 <b>when the deployment is taking place and if the</b></p> <p>12 <b>operatives were approached by OCG members, who may well</b></p> <p>13 <b>have challenged them in relation to being part of the</b></p> <p>14 <b>deployment, the short-term risk was to protect the</b></p> <p>15 <b>members of the public who may inadvertently have been</b></p> <p>16 <b>caught up in that.</b></p> <p>17 Q. If we look at the three aspects of what are the initial</p> <p>18 working strategy, the minimising of risk to the</p> <p>19 potential general public, the maximising of safety to</p> <p>20 TSU operatives and the maximising of safety of police</p> <p>21 officers deployed, are those three set out in order of</p> <p>22 priority?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Could we look at page 16, please. Powers and policy</p> <p>25 considerations, we there see a list of pieces of</p> <p style="text-align: center;">Page 99</p>	<p>1 legislation and guidance relating to -- I say this in</p> <p>2 general terms -- the rules by which armed officers are</p> <p>3 expected to act.</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Yes.</p> <p>6 Whilst you were typing each of those pieces of</p> <p>7 legislation and guidance onto this form, were you</p> <p>8 reminding yourself of the provisions of each of them or</p> <p>9 is this just something that gets done because it has to</p> <p>10 be done? Because it has to appear there?</p> <p>11 <b>A. I mean they are standard powers and policies for</b></p> <p>12 <b>considerations of firearms operations, so there is</b></p> <p>13 <b>an element that they are included as routine. Did</b></p> <p>14 <b>I consider them individually when I was placing them</b></p> <p>15 <b>there, I would suggest not, but they were obviously</b></p> <p>16 <b>constant considerations for any firearms deployment.</b></p> <p>17 Q. Thank you. Can we take that down, please.</p> <p>18 This application, following its completion, was sent</p> <p>19 off to Mr Turner and he in turn had to fill in the FA3</p> <p>20 form?</p> <p>21 <b>A. That's correct, yes.</b></p> <p>22 Q. Which is the strategic firearms commander's approval, if</p> <p>23 you like, of the application, isn't it?</p> <p>24 <b>A. It is, yes.</b></p> <p>25 Q. Although it was originally the plan for this deployment</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 to take place on 7 December, in fact, because the</p> <p>2 vehicle moved on that day, the plan was put off a day</p> <p>3 and it took place on 8 December, didn't it?</p> <p>4 <b>A. It took place on 8 December. I am not of the opinion</b></p> <p>5 <b>that was the reason why it was delayed.</b></p> <p>6 Q. Oh. What do you --</p> <p>7 <b>A. I can't recall the reason.</b></p> <p>8 Q. Right.</p> <p>9 <b>A. Because the reason the deployment was going it take</b></p> <p>10 <b>place in the morning, as I recall, as it did on the</b></p> <p>11 <b>morning of the 8th.</b></p> <p>12 Q. Yes.</p> <p>13 <b>A. I can't specifically recall the reason. My memory,</b></p> <p>14 <b>which I accept is somewhat faint after all these years,</b></p> <p>15 <b>is that there was some reason TSU couldn't do it on the</b></p> <p>16 <b>Monday the 7th and we put it back a day.</b></p> <p>17 Q. If we need to return to that, we will do, but let's for</p> <p>18 the moment move on, please, to the form that you</p> <p>19 completed for the deployment on 11 December.</p> <p>20 I know that you completed one form, the vast</p> <p>21 majority that was submitted and then additionally, the</p> <p>22 day before the deployment on 10 December, you updated</p> <p>23 it, didn't you?</p> <p>24 <b>A. That is correct.</b></p> <p>25 Q. So we will look at both.</p> <p style="text-align: center;">Page 101</p>	<p>1 The first form completed on 7 December, is to be</p> <p>2 found, Mr Coates, at IPC 1083.</p> <p>3 Thank you.</p> <p>4 Could we go to the next page, please.</p> <p>5 We can see that this form was commenced and I am</p> <p>6 going to suggest completed on 7 December. We can see in</p> <p>7 the top right-hand corner "Operation Ankaa."</p> <p>8 Sir, if you want to follow this in our folder, it is</p> <p>9 behind divider 20.</p> <p>10 THE CHAIRMAN: Divider 20, yes, I have it, thank you.</p> <p>11 MS BLACKWELL: There we see Operation Morguld again.</p> <p>12 <b>A. Yes, that was obviously the template for the form that I</b></p> <p>13 <b>went back to each time I -- well, certainly on these two</b></p> <p>14 <b>occasions that I completed these forms and my</b></p> <p>15 <b>explanation is that it is some form of cut and paste</b></p> <p>16 <b>from a previous operation, which I am very disappointed</b></p> <p>17 <b>about.</b></p> <p>18 Q. Right.</p> <p>19 <b>A. It is the first time I have seen it, even picked up on</b></p> <p>20 <b>it in all the years that have gone past since. I have</b></p> <p>21 <b>looked at these forms obviously a lot and --</b></p> <p>22 THE CHAIRMAN: Yes.</p> <p>23 MS BLACKWELL: Let's look, please at the next page, thank</p> <p>24 you. The SIO is Rob Murray and the overview of his</p> <p>25 objectives are these:</p> <p style="text-align: center;">Page 102</p>
<p>1 "It is intended to conduct two simultaneous armed</p> <p>2 surveillance operations on Friday, 11 December in</p> <p>3 response to information that there is a conspiracy to</p> <p>4 facilitate an escape from custody of Izzet Eren. He is</p> <p>5 due to appear at Wood Green Crown Court on that day.</p> <p>6 "(a) maximise the safety of the public by removing</p> <p>7 firearms from the streets and ensuring Eren remains in</p> <p>8 custody:</p> <p>9 "(b) maximise the safety of Serco and court staff</p> <p>10 engaged in providing custody facilities for Eren.</p> <p>11 "(c) obtain movements and activities of subjects.</p> <p>12 "(d) identify criminal associates, their addresses</p> <p>13 and vehicles.</p> <p>14 "(e) obtain intelligence and evidence of</p> <p>15 criminality.</p> <p>16 "(f) arrest offenders and prosecute for</p> <p>17 firearm-related offences or other offences that</p> <p>18 demonstrate their level of criminality.</p> <p>19 "(g) recover items used in this offence,</p> <p>20 ie firearms, clothing, vehicles or mobile phones."</p> <p>21 Were these objectives set out in order of priority?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. The priority of the objectives was to maximise the</p> <p>24 safety of the public by removing firearms from the</p> <p>25 street and ensuring that Izzet Eren remained in custody?</p> <p style="text-align: center;">Page 103</p>	<p>1 <b>A. That's correct, yes.</b></p> <p>2 Q. The second priority was maximising the safety of Serco</p> <p>3 and court staff.</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. How was that being done when Serco were unaware of this</p> <p>6 operation?</p> <p>7 <b>A. That was being done through the second MASTS deployment</b></p> <p>8 <b>on the prison van.</b></p> <p>9 Q. Looking at the box below --</p> <p>10 <b>A. Sorry, sorry, and obviously the deployment of armed</b></p> <p>11 <b>officers in and around the court building on</b></p> <p>12 <b>11 December.</b></p> <p>13 Q. Thank you.</p> <p>14 The meeting at the court, Wood Green Crown Court and</p> <p>15 the application for armed presence at that court had not</p> <p>16 yet taken place, had it? Wasn't that meeting on</p> <p>17 8 December?</p> <p>18 <b>A. Mr Murray had already been to the court, I think, on</b></p> <p>19 <b>7 December, by the time -- it hadn't been approved, but</b></p> <p>20 <b>the process had been started.</b></p> <p>21 Q. Right. Thank you.</p> <p>22 Information and intelligence -- I am looking below</p> <p>23 the red sentence:</p> <p>24 "Operation Ankaa is a proactive operation being</p> <p>25 conducted by the central task force at Barking in</p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

<p>1 response to reliable intelligence that there is 2 an ongoing conspiracy to assist Izzet Eren in escaping 3 from custody on Friday, 11 December when due to appear 4 at Wood Green Crown Court: 5 "On Tuesday, 13 October, Izzet Eren and Erwin Gyamfi 6 were stopped by ARVs on a stolen motorbike travelling 7 south from Haringey towards Hackney in Stamford Hill, 8 N16. They were in possession of two loaded weapons with 9 the safety catches off, a Tokarev 9mm pistol containing 10 six rounds of ammunition and a Skorpion machine pistol 11 with a full magazine. 12 "They were charged and first appeared at Wood Green 13 Crown Court on Friday, 1 November pleading guilty to 14 offences including possession of firearms with intent to 15 endanger life." 16 In fact, they had appeared at Wood Green Crown Court 17 on 29 October, hadn't they? 18 <b>A. That's correct, that is an error on my part.</b> 19 Q. "Given the overall circumstances of their arrest, stolen 20 motorbike, nature and ready condition of firearms, 21 clothing, two sets and balaclavas, Izzet Eren has been 22 deported from the UK and has clearly evidential history 23 of shootings, murders involving the Eren family. 24 "The prosecution were allowed a period of six weeks 25 to consider their position whether an offence of</p> <p style="text-align: center;">Page 105</p>	<p>1 conspiracy to murder should be added to the indictment 2 prior to sentence. No decision has yet been made by the 3 CPS." 4 Was that final paragraph lifted from the previous 5 FA2 form? 6 <b>A. It may have been or it may have been lifted from the 7 email briefing I conducted.</b> 8 Q. Right, because by this date, hadn't the CPS made their 9 decision not to continue with the conspiracy to murder? 10 <b>A. I can't recall the date that decision was made, I am 11 sorry.</b> 12 THE CHAIRMAN: There will be a record of it somewhere, won't 13 there, Ms Blackwell? 14 MS BLACKWELL: Yes, we will obtain that. 15 THE CHAIRMAN: Thank you. 16 MS BLACKWELL: We see the same error again: 17 "On 1 November intelligence suggested that 18 Izzet Eren was in contact with his brother." 19 In fact that is the material, the intelligence that 20 you say you received on 29 or 30 October, isn't it? 21 <b>A. Sorry, where are --</b> 22 Q. I'm so sorry, under the second paragraph: 23 "Izzet Eren and Erwin Gyamfi have remained on remand 24 in Wormwood Scrubs and are next due to appear at Wood 25 Green Crown Court on Friday, 11 December."</p> <p style="text-align: center;">Page 106</p>
<p>1 The next sentence: 2 "On 1 November intelligence suggested that Eren was 3 in contact with his brother, conspiring to facilitate 4 his escape that day." 5 It's the same mistake? 6 <b>A. That is an error on my part, yes.</b> 7 Q. "Ozcan Eren was coordinating a team of unknown 8 individuals to carry out this attempt. They had access 9 to a stolen vehicle and weapons, including a firearm. 10 One of that team however was not prepared to assist and 11 the attempt was aborted until this coming Friday." 12 <b>A. Yes.</b> 13 Q. "The operational team have since identified the 14 aforementioned stolen vehicle, which has been parked 15 since then in a private car park in Eastern Road. This 16 is a short distance from Wood Green Crown Court and is 17 located between the court building and the North 18 Circular. This would appear the likely route taken by 19 any prison van arriving in the morning from Wormwood 20 Scrubs." 21 You didn't know the route that was going to be taken 22 that morning, did you? 23 <b>A. I didn't know definitively, no.</b> 24 Q. No. 25 <b>A. That was my assessment of the likely route.</b></p> <p style="text-align: center;">Page 107</p>	<p>1 Q. Based upon what? 2 <b>A. Based upon my knowledge of London, and the location of 3 the court and the best way of travelling from Wormwood 4 Scrubs to Wood Green at that time of the morning, which 5 of course would be the North Circular Road and then cut 6 down into Wood Green from there. That was my assessment 7 of the likely route.</b> 8 Q. Right. 9 Although you have explained your reasons for not 10 engaging with Serco, were there not other ways in which 11 you could have established or sought to establish the 12 route or the likely route that the vehicle was going to 13 take? 14 <b>A. I couldn't rule out there were no opportunities. We 15 could potentially have spoken to court staff, et cetera.</b> 16 Q. Or the prison? 17 <b>A. Yes, I am not discounting that, but we didn't explore 18 that.</b> 19 Q. That was not done. 20 <b>A. No.</b> 21 Q. I would like us to go down to the bottom of this page, 22 please, and the penultimate paragraph: 23 "Intelligence received on 3 December indicated that 24 Ozcan Eren is still in contact with Izzet and is putting 25 together a team of suitable individuals to effect the</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 escape. The identity of that personnel is currently 2 unknown. It is not known whether there will be 3 an attempt to assist Gyamfi to escape. Intelligence 4 received today has confirmed that this offence is still 5 planned and Ozcan Eren has recruited a team which 6 includes unknown IC3 males." 7 This document was being completed by you on 8 7 December. What information had come to your attention 9 that day to suggest to you that, firstly, the offence 10 was still planned, and, secondly, that it would include 11 unknown IC3, black, males? 12 <b>A. That was information passed to me by the case officers.</b> 13 Q. Right. 14 Next page, please. 15 Sorry, no, can we go, just stay on this page, the 16 final sentence: 17 "The intelligence suggests that the intention is to 18 attack the van in the ..." 19 <b>A. "Bounds Green area."</b> 20 Q. Right. 21 The next page doesn't seem to follow: 22 "The intelligence suggests that intention is to 23 attack the van in the Bounds Green area before it 24 arrives at Wood Green Crown Court." 25 What led you to believe that the attack was going to</p> <p style="text-align: center;">Page 109</p>	<p>1 take place in the Bounds Green area? 2 <b>A. That was intelligence again, I think it was passed to me 3 by the case officers.</b> 4 Q. Thank you: 5 "Whilst there has been no further intelligence 6 updates to indicate that firearms will be used on 7 Friday, I take the view that there is every likelihood 8 that this will be the case, given the antecedents of 9 this OCG and the fact that any successful attempt would 10 involve considerable threat and duress to any 11 custodians." 12 You were basing your assessment of whether or not 13 firearms would be used on the fact. 14 Firstly, this group of people had access to 15 firearms. 16 Secondly, in your view, it would be logical to 17 assume that a firearm would be used to threaten the 18 Serco custodians? 19 <b>A. That's correct, I think that is a reasonable conclusion 20 that most people would come to.</b> 21 Q. So as of 7 December, you had not received any 22 intelligence to indicate that firearms would be used? 23 <b>A. Not specifically, no.</b> 24 Q. Thank you. 25 Can we look to the bottom of this page, please,</p> <p style="text-align: center;">Page 110</p>
<p>1 where we deal with what is going on at the prison and 2 the court. 3 Consultation and briefings have taken place with 4 Governor Nichols at Wormwood Scrubs, the residing judge 5 at Wood Green, Judge Pawlak, and the Wood Green court 6 manager, Zeb Johnson, all of whom are content with the 7 MPS response and have provided authority for MPS 8 officers to operate within their respective premises." 9 Excuse me for a minute, sir. 10 When you completed this form, had you been told that 11 Judge Pawlak and the Wood Green court manager, 12 Zeb Johnson, had provided authority for MPS officers to 13 operate within their premises? 14 <b>A. No, reading that now, I realise that that is incorrect, 15 because I was informed that in fact that wasn't their 16 position to give that authority and that is why I went 17 to the Royal Courts of Justice the following day.</b> 18 Q. Yes. 19 <b>A. So that is incorrect, I am afraid. In relation to 20 Mr Johnson and Mr Pawlak.</b> 21 Q. Can we go to page 8, please: 22 "Sinan Ozger was arrested ..." 23 We have in fact the same intelligence that has 24 appeared on the previous form. 25 Then we have:</p> <p style="text-align: center;">Page 111</p>	<p>1 "Intelligence received on 29/30 November indicated 2 that Sinan Ozger has been engaged in the movement and 3 safekeeping of firearms and it was Ozger who performed 4 this same function prior to Izzet Eren's arrest and 5 possession of a loaded Skorpion sub-machine gun on 6 13 October." 7 We then move down to the next box: 8 "Intelligence indicates that they were in possession 9 of a firearm and a hammer on the last occasion." 10 To what does that relate? 11 <b>A. That relates to the aborted attempt on 29 October.</b> 12 Q. I know that I asked you this this morning, but I am 13 going to ask you again. In your mind, was the firearm 14 a real firearm or an imitation firearm? 15 <b>A. The indication provided to me, in my understanding, it 16 was a viable real firearm.</b> 17 Q. Right. 18 Could we go to page 12, please. 19 We are going to be able to run through this quite 20 quickly, but in this form you have assessed what you 21 considered to be the threat and risk posed to various 22 individuals or groups of individuals. 23 <b>A. Yes.</b> 24 Q. In relation to all of them, have you assessed the threat 25 or risk as being low?</p> <p style="text-align: center;">Page 112</p>

28 (Pages 109 to 112)

<p>1 <b>A. I have, yes.</b></p> <p>2 Q. "The general public: it is not envisaged that any such</p> <p>3 offence will be committed in the direct presence of</p> <p>4 members of the public and as such the threat to</p> <p>5 potential victims is currently low."</p> <p>6 Was it your belief that the springing of Izzet Eren</p> <p>7 was not going to take place in public?</p> <p>8 <b>A. No, that was not my belief. Again, it is probably not</b></p> <p>9 <b>appropriately worded. Probably better worded that we</b></p> <p>10 <b>didn't know the precise location where it was going to</b></p> <p>11 <b>take place.</b></p> <p>12 Q. Thank you:</p> <p>13 "Serco or other custodians: we have good control of</p> <p>14 the Audi and the prison van and these vehicles will not</p> <p>15 be permitted to ever come close together."</p> <p>16 Again that control, in your mind, certainly as far</p> <p>17 as the prison van was concerned, was surveillance</p> <p>18 control.</p> <p>19 <b>A. That's correct.</b></p> <p>20 Q. You confirmed:</p> <p>21 "If we ever did lose control of the Audi or</p> <p>22 intelligence suggest the use of another vehicle, we have</p> <p>23 the contingency of SFOs on the van and the option of</p> <p>24 overt ARV support as well."</p> <p>25 Were you assessing the risk to Serco or other</p> <p style="text-align: center;">Page 113</p>	<p>1 custodians at the time that you were completing this</p> <p>2 form or were you assessing the risk as it would be</p> <p>3 expected to occur at the time of the incident?</p> <p>4 <b>A. In relation to all the groups within this threat, the</b></p> <p>5 <b>time that I am referring to the threat as being low is</b></p> <p>6 <b>at the surveillance stage of the operation, at the</b></p> <p>7 <b>commencement of the surveillance stage of the operation.</b></p> <p>8 Q. Right.</p> <p>9 <b>A. When the threat obviously with the prison van either</b></p> <p>10 <b>being in Wormwood Scrubs or some distance from the Audi</b></p> <p>11 <b>or any other conspirators was considerable, so there was</b></p> <p>12 <b>no immediacy of that threat and therefore that threat is</b></p> <p>13 <b>low.</b></p> <p>14 Q. But you were prepared through the course of this</p> <p>15 operation to reflect on that assessment and indeed</p> <p>16 I think we know that when you called state amber you</p> <p>17 increased the threat level to medium?</p> <p>18 <b>A. That's correct, yes.</b></p> <p>19 Q. Can we go to page 14, please.</p> <p>20 I would like to just deal with this issue before we</p> <p>21 break for lunch, sir.</p> <p>22 THE CHAIRMAN: Certainly.</p> <p>23 MS BLACKWELL: "Threat and risk to the subjects: the</p> <p>24 subjects may be subjected to an armed interception or</p> <p>25 intervention if circumstances dictate. The chosen</p> <p style="text-align: center;">Page 114</p>
<p>1 location, tactics and the use of trained personnel who</p> <p>2 will be in possession of appropriate equipment,</p> <p>3 including less-lethal options, will reduce the threat</p> <p>4 posed to the subjects. The subjects' own actions will</p> <p>5 dictate the level of police response, which will be</p> <p>6 directly proportional to the threat they pose to the</p> <p>7 public and/or police."</p> <p>8 You didn't know when you completed this form whether</p> <p>9 or not what was likely to transpire would be an armed</p> <p>10 interception or intervention?</p> <p>11 <b>A. No, I had no --</b></p> <p>12 Q. You had no way of knowing?</p> <p>13 <b>A. No way of knowing how events would plan out -- pan out</b></p> <p>14 <b>on the day.</b></p> <p>15 Q. When you say, "The chosen location ... will reduce the</p> <p>16 threat posed to the subjects", you didn't know where the</p> <p>17 location was going to be, did you?</p> <p>18 <b>A. No, exactly.</b></p> <p>19 Q. What did that mean, "The chosen location ... will reduce</p> <p>20 the threat posed to the subjects"?</p> <p>21 <b>A. That if I reached the decision where I was going to</b></p> <p>22 <b>authorise an arrest or detention of the subjects, then</b></p> <p>23 <b>I had the capability as best I could with my control at</b></p> <p>24 <b>the time -- if so, to decide where that would take</b></p> <p>25 <b>place. Again, it might not -- the wording there, with</b></p> <p style="text-align: center;">Page 115</p>	<p>1 <b>reflection as I look at it now, was not potentially the</b></p> <p>2 <b>best.</b></p> <p>3 THE CHAIRMAN: What did you mean to say?</p> <p>4 <b>A. The precise location was probably more accurate.</b></p> <p>5 MS BLACKWELL: All right.</p> <p>6 Were the armed officers in fact in possession of</p> <p>7 less-lethal options than firearms that they carried?</p> <p>8 <b>A. I think they always carry less-lethal options as</b></p> <p>9 <b>a matter of course.</b></p> <p>10 Q. What did you mean by that, can you give us an example?</p> <p>11 <b>A. For example a Taser, for example.</b></p> <p>12 Q. Right.</p> <p>13 Finally this, the bottom half of this page:</p> <p>14 "Izzet Eren and other prisoners on the Serco van,</p> <p>15 the threat and risk to them: we have good control of the</p> <p>16 Audi and the prison van and these vehicles will not be</p> <p>17 permitted to ever come close together."</p> <p>18 It is the same rationale for the protection of the</p> <p>19 Serco operatives?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Of course, if as we have established this morning, the</p> <p>22 gang decided at the last minute not to use the Audi,</p> <p>23 then you would not have control of the vehicle that was</p> <p>24 going to be deployed to attack the van, would you?</p> <p>25 <b>A. No, then I would have gone to overt disruption at the</b></p> <p style="text-align: center;">Page 116</p>

29 (Pages 113 to 116)

<p>1 <b>earliest opportunity.</b></p> <p>2 MS BLACKWELL: Yes, thank you.</p> <p>3 THE CHAIRMAN: That means?</p> <p>4 <b>A. Well, then we would have had like an overt police</b></p> <p>5 <b>presence around that van and close to it. So it would</b></p> <p>6 <b>have been clear to anyone approaching that van that the</b></p> <p>7 <b>police were providing protection to it. It would also</b></p> <p>8 <b>have been clear to Mr Izzet Eren within the van that the</b></p> <p>9 <b>police were providing overt protection to it.</b></p> <p>10 THE CHAIRMAN: Thank you.</p> <p>11 MS BLACKWELL: Sir, is that a convenient moment?</p> <p>12 THE CHAIRMAN: Yes.</p> <p>13 Shall we resume at 1.50?</p> <p>14 MS BLACKWELL: Yes, thank you.</p> <p>15 THE CHAIRMAN: Very good.</p> <p>16 (1.04 pm)</p> <p>17 (The Luncheon Adjournment)</p> <p>18 (1.50 pm)</p> <p>19 THE CHAIRMAN: Thank you.</p> <p>20 MS BLACKWELL: Sir, we are just waiting for the MPS to</p> <p>21 return.</p> <p>22 MR BUTT: Sorry, sir.</p> <p>23 MS BLACKWELL: Thank you.</p> <p>24 Could we have back on screen, please, IPC1083 at</p> <p>25 page 14. Just before the break, Mr Williams, we were</p> <p style="text-align: center;">Page 117</p>	<p>1 discussing the lower part of this page, which relates to</p> <p>2 your assessment of the threat and risk faced or facing</p> <p>3 Izzet Eren and the other prisoners on the Serco van. We</p> <p>4 have explored together the fact that, whilst your</p> <p>5 information or the information that you had received,</p> <p>6 was that the Audi vehicle, which had been, or was about</p> <p>7 to be fitted with the probe was likely to be involved in</p> <p>8 the escape attempt, I think you accepted that it may</p> <p>9 well have not formed such a part of the plan, in that it</p> <p>10 could have been jettisoned at the last minute?</p> <p>11 <b>A. That was always a possibility. I suppose from my own</b></p> <p>12 <b>personal perspective, when the vehicle moved on</b></p> <p>13 <b>7 December, that increased the likelihood that it would</b></p> <p>14 <b>be used in some capacity on the 11th.</b></p> <p>15 Q. Did that happen before or after you completed this form?</p> <p>16 <b>A. That happened before.</b></p> <p>17 Q. Could we turn to page 17, please.</p> <p>18 In the same way as you did when filling out the form</p> <p>19 for the deployment on 8 December, you have performed the</p> <p>20 same exercise by setting out a series of overarching</p> <p>21 principles in relation to this deployment.</p> <p>22 Again, would you agree, Mr Williams, that these</p> <p>23 seven aspects of the initial working strategy are set</p> <p>24 out in order of priority?</p> <p>25 <b>A. Yes, I would.</b></p> <p style="text-align: center;">Page 118</p>
<p>1 Q. Did you discuss these at any time with Mr Turner prior</p> <p>2 to completing your form?</p> <p>3 <b>A. No, I didn't.</b></p> <p>4 Q. Right.</p> <p>5 Would that have been a sensible thing to do, do you</p> <p>6 think?</p> <p>7 <b>A. It is something potentially that could have happened.</b></p> <p>8 <b>I didn't see the need for it when I completed the form.</b></p> <p>9 <b>Ordinarily the tactical firearms commander would detail</b></p> <p>10 <b>what his initial working strategy would be --</b></p> <p>11 Q. Yes.</p> <p>12 <b>A. -- and obviously Mr Turner then had the option to either</b></p> <p>13 <b>accept that or amend it.</b></p> <p>14 Q. How long did it take you to complete this form?</p> <p>15 <b>A. An hour and a half? That is a very speculative</b></p> <p>16 <b>estimate. An hour and a half?</b></p> <p>17 Q. About an hour and a half.</p> <p>18 Did you type out each of the words that we see on</p> <p>19 this form, other than those that appear to describe the</p> <p>20 boxes?</p> <p>21 I am not just talking about this page.</p> <p>22 <b>A. Sorry, the whole --</b></p> <p>23 Q. In relation to the whole of the form there are certain</p> <p>24 boxes which have words to describe what should be</p> <p>25 written there, such as on this page "Threat and risk and</p> <p style="text-align: center;">Page 119</p>	<p>1 initial working strategy and overarching principles ..."</p> <p>2 <b>A. Obviously there was an element of cut and paste, as we</b></p> <p>3 <b>have established, so it probably is mix and match</b></p> <p>4 <b>between a little bit of cut and paste and physical</b></p> <p>5 <b>typing.</b></p> <p>6 Q. Thank you.</p> <p>7 Could we have a look at page 19, please.</p> <p>8 We have discussed the provision of this information</p> <p>9 in relation to your previous FA2 form. Do you think</p> <p>10 that you performed a cut and paste exercise in relation</p> <p>11 to the powers and policy considerations from --</p> <p>12 <b>A. I probably did, yes.</b></p> <p>13 Q. Right.</p> <p>14 Could we turn to page 23, please. The options and</p> <p>15 tactics considered by the TFC, overt disruption:</p> <p>16 "Rationale: should there be lack of control of the</p> <p>17 Audi or the subjects and intelligence suggests that the</p> <p>18 attempt is still taking place, we have the additional</p> <p>19 contingency of deploying over assets around the ..."</p> <p>20 Should that be "overt" assets?</p> <p>21 <b>A. It should be overt.</b></p> <p>22 Q. "... around the Serco van. Whilst no approach has been</p> <p>23 made to Serco staff at this stage due to potential</p> <p>24 compromise issues, we would have the option of speaking</p> <p>25 to the custodians and advising them to exit the vehicle</p> <p style="text-align: center;">Page 120</p>

30 (Pages 117 to 120)

<p>1 at any time."  2 THE CHAIRMAN: "Not to exit".  3 MS BLACKWELL: Not to exit --  4 THE CHAIRMAN: It reads "not" but it should be "not", is  5 that right?  6 <b>A. That's correct.</b>  7 MS BLACKWELL: Thank you, sir:  8 "... and them not to exit the vehicle at any time."  9 And:  10 "Against: may frustrate evidential opportunities,  11 however this is not the primary objective."  12 Here you are setting out a rationale for and against  13 overt disruption, which would include approaching the  14 custodians and telling them not to get out of the  15 vehicle. I am interested in your suggestion, "Argument  16 against overt disruption may frustrate the evidential  17 opportunities, however this is not the primary  18 objective", what did you mean by that?  19 <b>A. Overt – it comes back to the sustained public principle</b>  20 <b>argument in relation to this operation, is that</b>  21 <b>obviously if we revert to overt disruption during this</b>  22 <b>surveillance operation, in a similar way to why we</b>  23 <b>hadn't disrupted the events in advance of 11 December,</b>  24 <b>by doing it, if we could frustrate evidential</b>  25 <b>opportunities to prosecute and remove the threat in the</b></p> <p style="text-align: center;">Page 121</p>	<p>1 <b>long term. So obviously that is why we were doing the</b>  2 <b>operation in the first place, and to go overt would</b>  3 <b>frustrate that. But that was not my primary objective.</b>  4 Q. What was your primary objective?  5 <b>A. The safety of all parties during the commission of the</b>  6 <b>operation and the safe delivery of Izzet Eren to be</b>  7 <b>sentenced on 11 December.</b>  8 Q. All of which could have been avoided if you had insisted  9 on the sentencing hearing taking place by video-link?  10 <b>A. Yes, as we have discussed. It could have been avoided</b>  11 <b>but in my opinion, it was a necessity to conduct this</b>  12 <b>operation, to sustain public protection.</b>  13 Q. Thank you. Could we look at page 25, please:  14 "Proposed options and plan. It is intention of the  15 operational team to conduct three surveillance  16 operations on the Audi, on the Serco prison van and on  17 Ozcan Eren, if he is not with the Audi. The first two  18 being armed and the last being unarmed."  19 Which is precisely what happened?  20 <b>A. That's correct.</b>  21 Q. "... with a view to gather intelligence evidence in  22 relation to the planned offence as outlined or other  23 opportunities to arrest and disrupt the escape plan.  24 I have also considered other options such as do nothing,  25 arrest now, take mitigating action, await for further</p> <p style="text-align: center;">Page 122</p>
<p>1 intelligence, conduct unarmed surveillance and  2 conducting static OPs. However, in the circumstances,  3 as outlined in this application, and on applying the  4 NDM, these options do not meet the threat assessment or  5 the operational aims. The proposed tactics meet the  6 threat assessment, the working strategy and are  7 proportionate given the threats posed. All actions are  8 legal, as documented in this document."  9 What were the proposed tactics?  10 <b>A. The proposed tactics were to conduct multiple</b>  11 <b>deployments that day, the three deployments, a MASTS</b>  12 <b>operation on the Audi, which was a mobile armed support</b>  13 <b>to surveillance in a covert evidence gathering capacity.</b>  14 Q. Yes.  15 <b>A. Obviously the deployment on the prison vehicle as</b>  16 <b>an armed contingency and, thirdly, an unarmed deployment</b>  17 <b>on Ozcan Eren.</b>  18 Q. One important aspect of your consideration was obviously  19 if you let this conspiracy run, there was a risk that  20 somebody or somebodies might get hurt?  21 <b>A. Yes, there is always risk. There is always risk. And,</b>  22 <b>sadly, it cannot always be avoided but you have to</b>  23 <b>balance that risk with the operational objectives.</b>  24 Q. I was just about to say, one very important task that  25 you have to perform as tactical firearms commander is to</p> <p style="text-align: center;">Page 123</p>	<p>1 assess the level of risk and to balance the risk in  2 terms of competing decisions, in terms of what is going  3 to happen and what you are going to allow to happen?  4 <b>A. That's correct, yes.</b>  5 Q. Part of that balancing exercise must have at its heart  6 the principles from the ECHR and in particular Article  7 2, the right to life?  8 <b>A. That's correct, yes.</b>  9 Q. Let's look, please at page 27.  10 Here we can see under the first box  11 "Proportionality":  12 "The method to be employed on this operation is  13 proportional to the serious crime being undertaken by  14 the subjects. It can be seen from this initial  15 application there is an ongoing conspiracy to commit  16 serious crime, ie crimes for which a previously  17 unconvicted person of 21 years or more would be  18 sentenced to three years or more imprisonment upon first  19 conviction, the use of SCO19 AFOs is a measured response  20 commensurate to the level of criminality being  21 investigated and provides a level of protection to all  22 parties, the issue of firearms surrounding the  23 deployment is justified and proportionate to the aims it  24 seeks to achieve: the safety of the public and police."  25 Do you think that you typed that out or do you think</p> <p style="text-align: center;">Page 124</p>

<p>1 that you lifted that from another application form?</p> <p>2 <b>A. I think my modus operandi in completing these forms was</b></p> <p>3 <b>probably to lift it from and then if it needed amending</b></p> <p>4 <b>in any way that I would amend it as I went through,</b></p> <p>5 <b>whether I did on this form or not, I can't say</b></p> <p>6 <b>definitively. It is possible.</b></p> <p>7 Q. Okay.</p> <p>8 The reason that I ask is it seems quite generic,</p> <p>9 doesn't it, there is nothing in that paragraph that you</p> <p>10 would say specifically relates to this operation?</p> <p>11 <b>A. That is a fair comment, that's correct, yes.</b></p> <p>12 Q. I am going to ask you the same question about the next</p> <p>13 box, headed "Legality" -- I am not going to read through</p> <p>14 it but, again, does it appear to you as if that may well</p> <p>15 have been lifted from a previous form?</p> <p>16 <b>A. Yes, I think you could say that in relation to every box</b></p> <p>17 <b>on this page.</b></p> <p>18 Q. Let's look at the third and the fourth box, because</p> <p>19 these relate to accountability and necessity of the</p> <p>20 operation, taking into account the ECHR principles.</p> <p>21 If we read the text of the accountability box, it</p> <p>22 reads as follows:</p> <p>23 "In this operation, it is appropriate to deploy</p> <p>24 firearms to protect the public, the TSU and police."</p> <p>25 I am going to move straight away to the next box,</p> <p style="text-align: center;">Page 125</p>	<p>1 "Necessity":</p> <p>2 "The outlined deployment is a necessary means of</p> <p>3 dealing with the problem and long-term threat. Other</p> <p>4 options such as early arrest have been considered and</p> <p>5 discounted as inappropriate in favour of the proposed</p> <p>6 method. The operational tactics are necessary to</p> <p>7 provide the maximum opportunity to protect the public</p> <p>8 and the TSU from those who carry and use firearms."</p> <p>9 The TSU were not part of this deployment on</p> <p>10 11 December, were they?</p> <p>11 <b>A. That's correct, that's an error.</b></p> <p>12 Q. Could we display at the side of this document --</p> <p>13 THE CHAIRMAN: TSU being the tactical support unit?</p> <p>14 MS BLACKWELL: Yes.</p> <p>15 <b>A. Technical, sir, technical.</b></p> <p>16 THE CHAIRMAN: Technical support unit, sorry.</p> <p>17 MS BLACKWELL: IPC1080 at page 24.</p> <p>18 By all means take your time and look through it,</p> <p>19 Mr Williams, but the document on the right-hand side is</p> <p>20 the ECHR principles page from the application for the</p> <p>21 TSU deployment on 8 December.</p> <p>22 The document on the left-hand side is the ECHR</p> <p>23 principles page for the application for the deployment</p> <p>24 on 11 December.</p> <p>25 They are identical, aren't they?</p> <p style="text-align: center;">Page 126</p>
<p>1 <b>A. Yes. It appears so. I wouldn't disagree with that.</b></p> <p>2 Q. It appears what you have done is copy and paste in its</p> <p>3 entirety, apart from the box at the bottom which bears</p> <p>4 the date and your signature, what you had submitted for</p> <p>5 the application for the TSU deployment?</p> <p>6 <b>A. That is a fair comment.</b></p> <p>7 Q. Does that mean that, during the course of your</p> <p>8 application for the deployment on 11 December, you gave</p> <p>9 no consideration to this ECHR principles?</p> <p>10 <b>A. It doesn't mean that at all.</b></p> <p>11 Q. Do you agree that that might be the impression that is</p> <p>12 left with someone reading these forms?</p> <p>13 <b>A. I agree that might be the impression, but that wasn't</b></p> <p>14 <b>the case.</b></p> <p>15 Q. What was the proposed plan for when the occupants of the</p> <p>16 Audi had been surveyed, stopped and approached, what was</p> <p>17 in your mind as to what would take place once the plan</p> <p>18 had reached that stage?</p> <p>19 <b>A. I think, if I could refer you to my comments in my</b></p> <p>20 <b>operational log, on the 11th --</b></p> <p>21 Q. Yes.</p> <p>22 <b>A. I describe that it is hard to be prescriptive about the</b></p> <p>23 <b>tactics that I will employ, because I do not know how</b></p> <p>24 <b>and when any tipping points may arise.</b></p> <p>25 <b>So in answer to your question, did I have a plan in</b></p> <p style="text-align: center;">Page 127</p>	<p>1 <b>my mind as to how that would happen? The answer simply</b></p> <p>2 <b>is no, I did not.</b></p> <p>3 Q. Had you given it any thought at all as to the</p> <p>4 alternative scenarios that might present themselves?</p> <p>5 <b>A. You always have alternative scenarios in the back of</b></p> <p>6 <b>your mind, absolutely. So, yes, I have given thought to</b></p> <p>7 <b>alternative scenarios which may arise.</b></p> <p>8 Q. Because a discussion, if you like, or an explanation of</p> <p>9 what those scenarios might be doesn't seem to have made</p> <p>10 its way to this document or these documents, does it?</p> <p>11 <b>A. Certainly in relation to this page, yes.</b></p> <p>12 Q. Can we put up please, Mr Coates, COP32 at page 5.</p> <p>13 This is the legal framework for armed policing and</p> <p>14 comes from the APP.</p> <p>15 Can we focus in, please, at the bottom of the page</p> <p>16 under the heading "Absolutely necessary":</p> <p>17 "Absolutely necessary. The question of whether</p> <p>18 a use of force was absolutely necessary in the</p> <p>19 circumstances is one that depends to a large degree on</p> <p>20 the facts of the individual case. Key issues to</p> <p>21 consider include:</p> <p>22 "The nature of the aim pursued -- is it for</p> <p>23 protection of a person from unlawful violence which</p> <p>24 poses a real and immediate risk to life?</p> <p>25 "Is the use of firearms or force which has the</p> <p style="text-align: center;">Page 128</p>

32 (Pages 125 to 128)



<p>1 potential to result in death absolutely necessary in the 2 circumstances, bearing in mind the dangers to the lives 3 of all persons involved? 4 "What are the risks to others, including the subject 5 of the force and all others in the vicinity?" 6 Was that something, the absolute necessity to use 7 force, something which you were considering when you 8 were completing your FA2 form? 9 <b>A. The absolute necessity to use force?</b> 10 Q. Yes. 11 <b>A. Specifically, in relation to that, no, because</b> 12 <b>ultimately that -- the decision to use force ultimately</b> 13 <b>comes down to the individual officer.</b> 14 Q. Did you consider whether you were applying your tactical 15 firearms commander's analysis to what you thought may 16 happen, that it may well result in the use of force? 17 <b>A. That is probably a better way of putting it. Yes, at</b> 18 <b>some stage, if the operation proceeded and I reached</b> 19 <b>a decision either through evidence or through</b> 20 <b>intelligence or through other tipping points that I was</b> 21 <b>going to direct an arrest or a detention of the</b> 22 <b>subjects, then, clearly, there is the potential for the</b> 23 <b>use of force. However that may be carried out.</b> 24 Q. Could we look at page 8 of this document, please. Thank 25 you.</p> <p style="text-align: center;">Page 129</p>	<p>1 Focus in on "Human Rights Act considerations": 2 "The following considerations will assist in 3 ensuring that the principles of accountability, 4 legality, necessity and proportionality are addressed in 5 respect of any action being considered. 6 "What is my objective? Is what I am doing 7 proportionate? Do I have a lawful power? Is there 8 a legal basis to my action? Is the proposed action 9 relevant and necessary? Is there a reasonable 10 relationship between the aim to be achieved and the 11 means used? Is there a less intrusive alternative? Can 12 the objective be achieved with less impact on the rights 13 of the subject and any others likely to be affected by 14 the action?" 15 Can we go over to page 9, please: 16 "Is the operation being planned to minimise, to the 17 greatest extent possible, recourse to the use of lethal 18 force?" 19 Is it your evidence, Mr Williams, that your planning 20 of this operation was consistent with an intention to 21 minimise to the greatest extent possible recourse to the 22 use of lethal force? 23 <b>A. That is my evidence. And if -- I refer you back to the</b> 24 <b>meeting on 10 November, the purpose of that meeting was</b> 25 <b>discussed, whether it was feasible and safe to conduct</b></p> <p style="text-align: center;">Page 130</p>
<p>1 the operation. 2 <b>The FA2 form speaks about the overarching principle</b> 3 <b>being the preservation of life to all parties.</b> 4 <b>My operational log reiterates that principle and</b> 5 <b>I talk about the absolute necessity of managing the</b> 6 <b>safety of all parties. If at any time I felt I was</b> 7 <b>losing control and not being able to deliver that,</b> 8 <b>I would revert to an overt disruption of the conspiracy</b> 9 <b>as a means of complying with the Article 2 directions.</b> 10 <b>Even if that was to the detriment of evidential</b> 11 <b>opportunities.</b> 12 <b>Clearly we wanted to try and remove the risk in the</b> 13 <b>long term, as we have spoken about, the sustained public</b> 14 <b>protection, that was the necessity for conducting the</b> 15 <b>operation in the first place. But the pursuit of that</b> 16 <b>and evidential objectives was not the paramount</b> 17 <b>principle for me, it was about safety for all parties.</b> 18 Q. Nowhere in your FA2 document is there an indication of 19 what you had in mind, by way of planning for the 20 resolution of this operation, or arrest. 21 <b>A. This was an imprecise operation. It was an imprecise</b> 22 <b>operation. I did not know how, where, when or who would</b> 23 <b>be involved in the operation itself, and I did not know</b> 24 <b>how or where they would be or when the tipping points</b> 25 <b>might come to lead me to a decision to either arrest or</b></p> <p style="text-align: center;">Page 131</p>	<p>1 <b>detain or disrupt.</b> 2 Q. Isn't it the role of the tactical firearm commander, and 3 the responsibility of the tactical firearms commander, 4 to make a plan, even if that involves contingencies? 5 <b>A. I think throughout the documents that were submitted,</b> 6 <b>there are numerous contingencies available to me. The</b> 7 <b>whole MASTS operation is that it is a platform from</b> 8 <b>which a number of operational contingencies to effect</b> 9 <b>your working strategy are available to you. It is fair</b> 10 <b>comment, have I -- on my FA2, have I gone through each</b> 11 <b>and every one of those that may be available to me? No,</b> 12 <b>I haven't.</b> 13 Q. The danger of that is if you don't go through it on your 14 FA2 form, there is nothing for the strategic firearms 15 commander to comment upon, or to take up or to reject? 16 <b>A. A strategic firearms commander obviously reviews my form</b> 17 <b>and he has it within his supervisory role to direct any</b> 18 <b>further information that he might require in terms of</b> 19 <b>his providing an authority and any tactical parameters</b> 20 <b>for that authority.</b> 21 <b>So that is an option that is open to him.</b> 22 Q. Nor in your document do we see any balancing of the 23 operational gains of running the operation against the 24 inherent risks, in terms of Article 2 and the ECHR 25 principles, do we?</p> <p style="text-align: center;">Page 132</p>

<p>1 <b>A. I think it is fair to say that there is not a specific</b>  2 <b>strategic risk assessment along the lines you have just</b>  3 <b>outlined, but in my submission, the principles are fully</b>  4 <b>documented in terms of why we were doing the operation,</b>  5 <b>the necessity to do the operation and the benefits in --</b>  6 <b>if we were successful in terms of sustained public</b>  7 <b>protection.</b>  8 Q. Thank you. Can we take that down, please.  9 When you submitted your FA2, at the same time, you  10 sent by email a series of intelligence profiles. Do you  11 remember that those were attached to the document?  12 <b>A. That's correct, yes.</b>  13 Q. We touched upon this this morning, the profiles I think  14 at the very latest were dated April 2015?  15 <b>A. Yes. Yes. I probably should explain, I took the latest</b>  16 <b>profiles available on our shared drive and attached them</b>  17 <b>and they may not have been the most up to date</b>  18 <b>available.</b>  19 Q. In hindsight, do you think you should have commissioned  20 new ones?  21 <b>A. Yes.</b>  22 Q. Thank you.  23 We have already established that at this time,  24 although you were aware of the involvement of Ozcan Eren  25 and possibly Sinan Ozger, you had no other information</p> <p style="text-align: center;">Page 133</p>	<p>1 or intelligence about the identity of those who may be  2 involved in the plan?  3 <b>A. That's correct, we didn't have any idea.</b>  4 Q. We have seen a note in Mr Murray's notebook from  5 9 December that he was receiving information about two  6 IC3 males on that date, one with the initial N, did that  7 intelligence make its way to you?  8 <b>A. I was aware that IC3 males had been recruited. In</b>  9 <b>relation to the specific number of two, I don't recall</b>  10 <b>that and certainly I don't recall that in relation to</b>  11 <b>the -- to any IC3 male with the initial N.</b>  12 Q. You don't think that that specific information was  13 passed on to you?  14 <b>A. I don't think it was.</b>  15 Q. If it had been, what steps would you have taken to try  16 and identify a black male with the name beginning with  17 N?  18 <b>A. Well, we would obviously have commissioned intelligence</b>  19 <b>inquiries. In many ways it would not have been easy,</b>  20 <b>but obviously you look at known associates of the</b>  21 <b>organised crime group and then you look at antecedents,</b>  22 <b>which may support your view that that might be the right</b>  23 <b>person that we are talking about.</b>  24 Q. Yes.  25 <b>A. Then obviously you then look at any operational</b></p> <p style="text-align: center;">Page 134</p>
<p>1 <b>opportunities around that individual which may give you</b>  2 <b>a foot -- even more of an indication that that is the</b>  3 <b>right person we are thinking about.</b>  4 THE CHAIRMAN: Do I understand you to be saying that in your  5 capacity, you expected and should have been told that?  6 <b>A. I -- would I have been particularly disappointed if</b>  7 <b>I hadn't been told? I don't think -- just on that bare</b>  8 <b>facts, not necessarily because I would have imagined</b>  9 <b>that they were conducting the same sort of intelligence</b>  10 <b>enquiries that I have spoken about to try and</b>  11 <b>identify --</b>  12 THE CHAIRMAN: If the boot had been on the other foot and  13 you had been an SIO, having contact with someone in the  14 role that you were performing, would you have told that  15 person?  16 <b>A. Personally I would have, yes.</b>  17 THE CHAIRMAN: Yes.  18 Thank you.  19 MS BLACKWELL: I would like to move on to deal with your  20 visit to the Royal Courts of Justice on 8 December,  21 please.  22 As we have established, on 7 December, the day that  23 you were preparing this FA2 form, Detective Inspector  24 Murray had attended at Wood Green Crown Court, had  25 spoken to Zeb Johnson and had received information from</p> <p style="text-align: center;">Page 135</p>	<p>1 Judge Pawlak that the application for firearms presence  2 in the Crown Court at the time of the sentencing hearing  3 would have to involve an additional step. So you went  4 to the Royal Courts of Justice with Detective Chief  5 Superintendent Manson on 8 December to present your  6 application to Mrs Justice Sweeney?  7 <b>A. That's correct, yes.</b>  8 Q. Why didn't you go to Wood Green Crown Court the day  9 before?  10 <b>A. As I alluded to earlier, DI Murray had taken</b>  11 <b>responsibility not only for the prison but for the</b>  12 <b>courts as well.</b>  13 <b>It was only whilst he was at the courts on</b>  14 <b>7 December, that we became aware -- obviously we were</b>  15 <b>not experts in this field, as we were not experts in the</b>  16 <b>field around the prisons, we were guided to a certain</b>  17 <b>extent by those people who operate in that arena on</b>  18 <b>a daily basis. It was on that occasion that it</b>  19 <b>transpired that they weren't in position to grant that</b>  20 <b>authority and it had to be an officer of ACPO -- what</b>  21 <b>was then ACPO, Association of Chief Police Officers,</b>  22 <b>rank, ie in the Metropolitan Police command or above.</b>  23 <b>And so a meeting had been scheduled for the Tuesday</b>  24 <b>afternoon, 8 December. Obviously Mr Murray couldn't be</b>  25 <b>there because he was at the prison that day and so</b></p> <p style="text-align: center;">Page 136</p>

34 (Pages 133 to 136)

<p>1 <b>I agreed that I would do that.</b></p> <p>2 <b>Obviously that meant briefing or speaking to</b></p> <p>3 <b>an officer of ACPO rank, which naturally would be</b></p> <p>4 <b>Mr Ball from our command, obviously he had an awareness</b></p> <p>5 <b>of the operation anyway, not only had I emailed him that</b></p> <p>6 <b>initial briefing note after the meeting on 10 November,</b></p> <p>7 <b>I had had a face-to-face presentation with him and so he</b></p> <p>8 <b>was aware.</b></p> <p>9 <b>So it naturally fell to me to do that.</b></p> <p>10 Q. Did you know that there were particular steps that</p> <p>11 needed to be taken to successfully apply for firearms</p> <p>12 presence at a Crown Court?</p> <p>13 <b>A. Not prior to that day.</b></p> <p>14 Q. That is when you discovered the protocols?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. So you would have been aware that Wood Green Crown Court</p> <p>17 was not a Crown Court that was designated as suitable</p> <p>18 for firearms use?</p> <p>19 <b>A. Yes, I became aware of that, yes.</b></p> <p>20 Q. Did Mr Murray tell you that whilst he was at Wood Green</p> <p>21 Crown Court on 7 December, he had performed</p> <p>22 a reconnaissance around the court with other officers?</p> <p>23 <b>A. I do recall that taking place, yes.</b></p> <p>24 Q. All right.</p> <p>25 Did it concern you that that reconnaissance was</p> <p style="text-align: center;">Page 137</p>	<p>1 being undertaken by not the tactical firearms commander</p> <p>2 but the SIO of the operation?</p> <p>3 <b>A. No, it didn't concern me.</b></p> <p>4 Q. You didn't consider that a reconnaissance of --</p> <p>5 <b>A. I think the reconnaissance was for the benefit of the</b></p> <p>6 <b>SFO officers.</b></p> <p>7 Q. Right.</p> <p>8 <b>A. And it was probably prudent, if Mr Murray was there on</b></p> <p>9 <b>the day, that he could facilitate that at the same time.</b></p> <p>10 Q. Wasn't that your job though?</p> <p>11 <b>A. I wouldn't necessarily say it was my job, no.</b></p> <p>12 Q. Right.</p> <p>13 When you attended at the Royal Courts of Justice,</p> <p>14 what sort of presentation did you give to</p> <p>15 Mr Justice Sweeney?</p> <p>16 <b>A. Obviously there was a pro forma to be completed.</b></p> <p>17 Q. Yes.</p> <p>18 <b>A. Which had to be completed by the officer of the ACPO</b></p> <p>19 <b>rank and signed by them. Obviously Mr Ball had no idea</b></p> <p>20 <b>that this was coming his way, so I contacted him via his</b></p> <p>21 <b>staff officer, obviously expressed the time</b></p> <p>22 <b>considerations that this meeting was happening on</b></p> <p>23 <b>Tuesday afternoon --</b></p> <p>24 Q. Yes.</p> <p>25 <b>A. -- and we needed to get the form done by him and to</b></p> <p style="text-align: center;">Page 138</p>
<p>1 <b>the -- to Mr Sweeney, as soon as possible, for his</b></p> <p>2 <b>consideration.</b></p> <p>3 Q. I would just like to look, please, at a document,</p> <p>4 an email in fact, that was sent following Mr Murray's</p> <p>5 attendance at Wood Green Crown Court, and it is at CTS9,</p> <p>6 page 4, please.</p> <p>7 Sir, it is in our additional bundle at page 4.</p> <p>8 If we can highlight that, thank you.</p> <p>9 This is an email going from Zeb Johnson to</p> <p>10 Mr Justice Sweeney and others:</p> <p>11 "Thanks Jo, I know that the police do not want the</p> <p>12 case to be moved as they have surveillance in place and</p> <p>13 approval for unmarked cars and even a helicopter</p> <p>14 following the van from the prison. I suspect they are</p> <p>15 very eager and feeling optimistic about their plans to</p> <p>16 apprehend a number of individuals planning the escape,</p> <p>17 but of course will wait to hear from you. If you need</p> <p>18 any further information from myself or the DI in</p> <p>19 question, please let me know."</p> <p>20 Did you have approval for the use of a helicopter?</p> <p>21 <b>A. I don't recall that we had that at that stage.</b></p> <p>22 <b>Obviously Metropolitan Police do have assets of that</b></p> <p>23 <b>nature, so potentially they were available to us but we</b></p> <p>24 <b>didn't have authority at that time, I am pretty sure.</b></p> <p>25 Q. Did you have authority by the time that the morning of</p> <p style="text-align: center;">Page 139</p>	<p>1 11 December came?</p> <p>2 <b>A. You will have to forgive me, my knowledge and</b></p> <p>3 <b>recollection of what authority levels were needed for</b></p> <p>4 <b>the aerial support are somewhat faded in time, so --</b></p> <p>5 Q. All right, I am not going to press you on that, save and</p> <p>6 except to ask you to confirm in the event a helicopter</p> <p>7 was not utilised?</p> <p>8 <b>A. On the 11th?</b></p> <p>9 Q. Yes.</p> <p>10 <b>A. That is my recollection, yes.</b></p> <p>11 Q. Thank you.</p> <p>12 We can take that down now.</p> <p>13 Could we put up, please, IPC1091. I think this is</p> <p>14 a version of the application that was made, was this</p> <p>15 form completed by you?</p> <p>16 <b>A. So I believe that I submitted a draft for Mr Ball's</b></p> <p>17 <b>consideration, for him to read and make any amendments</b></p> <p>18 <b>that he would want to or potentially speak to me to get</b></p> <p>19 <b>clarity around. Obviously he is a very busy man, this</b></p> <p>20 <b>has come out a little bit of left field for him, so I'm</b></p> <p>21 <b>trying to make life as easy for him as possible.</b></p> <p>22 Q. Right, thank you.</p> <p>23 I think in fact, it had to be amended in any event</p> <p>24 because Mr Justice Sweeney at one stage asked for</p> <p>25 additional information, didn't he?</p> <p style="text-align: center;">Page 140</p>

35 (Pages 137 to 140)

<p>1 <b>A. That's correct, yes.</b></p> <p>2 Q. Yes.</p> <p>3 If we look at the final box on this page, "Nature</p> <p>4 and risk and reasons why the forms of security are</p> <p>5 thought inadequate":</p> <p>6 "Reliable and high-graded intelligence suggest that</p> <p>7 there is an ongoing conspiracy to assist Izzet Eren in</p> <p>8 escaping from custody on Friday, 11 December. The</p> <p>9 intelligence suggests that those seeking to carry out</p> <p>10 this offence will be in possession of firearms and other</p> <p>11 weapons."</p> <p>12 Did you consider the intelligence that you were</p> <p>13 receiving about the plan as being reliable and high</p> <p>14 grade?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Did that intelligence include information that those</p> <p>17 seeking to carry out the offence will be in possession</p> <p>18 of firearms?</p> <p>19 <b>A. Intelligence suggests that, although it was not</b></p> <p>20 <b>definitive the indication was that they would be.</b></p> <p>21 Q. In your form that you completed the day before, the FA2</p> <p>22 form, your position had been that there was no</p> <p>23 intelligence that firearms would be used but that, given</p> <p>24 the proclivity of firearm usage --</p> <p>25 <b>A. Very likely, yes.</b></p> <p style="text-align: center;">Page 141</p>	<p>1 Q. Yes, that you based your assessment as to whether or not</p> <p>2 firearms would be used on the fact that the attackers</p> <p>3 were trying to spring one of their number from a van and</p> <p>4 would need something to threaten the custodians with</p> <p>5 and, secondly, the proclivity with which this gang had</p> <p>6 access to firearms.</p> <p>7 Do you agree, Mr Williams, that what appears here</p> <p>8 suggests something rather different?</p> <p>9 <b>A. No, I don't agree. I would suggest it is the same. It</b></p> <p>10 <b>is different wording, so I understand the point you are</b></p> <p>11 <b>making, but --</b></p> <p>12 Q. This says:</p> <p>13 "The intelligence suggests that those seeking to</p> <p>14 carry out this offence will be in possession of firearms</p> <p>15 or other weapons."</p> <p>16 Is it your evidence that what you meant by that was</p> <p>17 that based upon the history of the group and the need to</p> <p>18 threaten the custodians, that they would be in</p> <p>19 possession of weapons?</p> <p>20 <b>A. That's correct, that is my evidence, yes.</b></p> <p>21 Q. Could we go to box 6, please. Thank you:</p> <p>22 "On Tuesday, 13 October Izzet Eren and Erwin Gyamfi</p> <p>23 were stopped by armed police on a stolen motorbike."</p> <p>24 Here you are setting out the history of what you</p> <p>25 know to be the case:</p> <p style="text-align: center;">Page 142</p>
<p>1 "They were charged and first appeared at Wood Green</p> <p>2 Crown Court on Friday, 1 November."</p> <p>3 Again, that is the wrong date, isn't it?</p> <p>4 <b>A. Yes. Yes.</b></p> <p>5 Q. "Taking into account the overall circumstances of the</p> <p>6 arrest, the prosecution were allowed a period of six</p> <p>7 weeks to consider their position on whether an offence</p> <p>8 of conspiracy to murder should be added to the</p> <p>9 indictment prior to sentence ..."</p> <p>10 And the series of factors:</p> <p>11 "No decision had yet been made by the CPS."</p> <p>12 Were you still unaware of any decision having been</p> <p>13 made?</p> <p>14 <b>A. Yes, that was obviously the case.</b></p> <p>15 THE CHAIRMAN: If you were right about it being on</p> <p>16 1 November, six weeks would barely have elapsed by the</p> <p>17 day the case was due to be sentenced.</p> <p>18 <b>A. Yes, I was wrong on that.</b></p> <p>19 THE CHAIRMAN: Did nobody chase up with the CPS?</p> <p>20 <b>A. I can't recall. I can't recall. Sir, I am afraid, on</b></p> <p>21 <b>that.</b></p> <p>22 MS BLACKWELL: Then this:</p> <p>23 "Whilst there are currently no specific intelligence</p> <p>24 updates to indicate that firearms will be used on</p> <p>25 Friday, there is every likelihood that this will be the</p> <p style="text-align: center;">Page 143</p>	<p>1 case, given the antecedents of the criminal network and</p> <p>2 the fact that any successful attempt would involve</p> <p>3 considerable threat and duress to any custodians."</p> <p>4 There you are making clear that there is no specific</p> <p>5 intelligence relating to the possession of firearms.</p> <p>6 THE CHAIRMAN: Relating to the use of firearms.</p> <p>7 MS BLACKWELL: Yes, relating to the use of firearms.</p> <p>8 Underneath we see this:</p> <p>9 "Governor Nichols at HMP Wormwood Scrubs is fully</p> <p>10 sighted on the intelligence and has consented to allow</p> <p>11 the defendants to be conveyed to Wood Green Court,</p> <p>12 having been satisfied that the police have sufficient</p> <p>13 control and resources to protect the transporting van."</p> <p>14 Did that information come to you from Mr Murray</p> <p>15 following his meeting, or meetings, with Governor</p> <p>16 Nichols?</p> <p>17 <b>A. That's correct.</b></p> <p>18 <b>Reading that again now, "fully sighted on the</b></p> <p>19 <b>intelligence" could have been better worded. He was</b></p> <p>20 <b>sighted on the overall intelligence picture, but he</b></p> <p>21 <b>probably wasn't fully sighted on all the intelligence.</b></p> <p>22 <b>That might be misleading.</b></p> <p>23 Q. If it was established that Governor Nichols had not been</p> <p>24 told of the aborted attempt on 29 October, he would not</p> <p>25 have been fully sighted, would he?</p> <p style="text-align: center;">Page 144</p>

36 (Pages 141 to 144)

<p>1 <b>A. Yes, I accept your point there.</b></p> <p>2 Q. Did you tell Mr Justice Sweeney about the aborted</p> <p>3 attempt on 29 October?</p> <p>4 <b>A. I believe I would have, yes. I am not 100 per cent on</b></p> <p>5 <b>that. I don't recall specifically.</b></p> <p>6 THE CHAIRMAN: Look at the form.</p> <p>7 <b>A. In answer to that question, your Honour, I was referring</b></p> <p>8 <b>to the personal presentation, I am sorry.</b></p> <p>9 MS BLACKWELL: It doesn't appear on the form.</p> <p>10 <b>A. Okay, I accept that. But --</b></p> <p>11 Q. May I suggest to you, Mr Williams, that if it is not on</p> <p>12 the form, it is unlikely to have formed part of your</p> <p>13 presentation?</p> <p>14 <b>A. Not necessarily.</b></p> <p>15 THE CHAIRMAN: Are you saying you did or are you saying you</p> <p>16 don't know?</p> <p>17 <b>A. I don't know.</b></p> <p>18 THE CHAIRMAN: Thank you.</p> <p>19 Can you tell us, please, what things you did, if you</p> <p>20 did inform him about anything, what things you did</p> <p>21 inform Mr Justice Sweeney about that don't appear on the</p> <p>22 form?</p> <p>23 <b>A. I can't be specific in relation to that, sir, I am</b></p> <p>24 <b>sorry.</b></p> <p>25 THE CHAIRMAN: Thank you.</p> <p style="text-align: center;">Page 145</p>	<p>1 MS BLACKWELL: We have touched upon tipping points. By the</p> <p>2 time you had completed your FA2 form on 7 December, and</p> <p>3 completed your presentation to Mr Justice Sweeney on</p> <p>4 8 December, and were in possession, I suggest, of the</p> <p>5 FA5 form, which is the tactical adviser's form that had</p> <p>6 been completed and sent to you by S48.</p> <p>7 Did you have a clear idea in your mind as to what</p> <p>8 would be the tipping points or evidential thresholds</p> <p>9 that would propel you to call state amber?</p> <p>10 <b>A. I definitely had an idea in my mind as to what the level</b></p> <p>11 <b>would be.</b></p> <p>12 Q. What was that?</p> <p>13 <b>A. It would be arrest for substantive criminality that</b></p> <p>14 <b>would meet the threat assessment and deal with the</b></p> <p>15 <b>threat in the long term. So specifically was</b></p> <p>16 <b>I confident that I could recover firearms? If, for</b></p> <p>17 <b>example, I received either evidence or intelligence that</b></p> <p>18 <b>confirmed in my mind that I was going to recover</b></p> <p>19 <b>firearms from taking action, I would have done that at</b></p> <p>20 <b>the earliest opportunity.</b></p> <p>21 <b>As tactical firearms commander, if you are in</b></p> <p>22 <b>receipt of that specific evidence or intelligence and</b></p> <p>23 <b>you are presented with a compelling case, then the risk</b></p> <p>24 <b>of allowing the operation to continue past that point is</b></p> <p>25 <b>simply not sustainable, because you are potentially</b></p> <p style="text-align: center;">Page 146</p>
<p>1 <b>losing control of firearms and the opportunity. So that</b></p> <p>2 <b>is one example.</b></p> <p>3 <b>Obviously, in my -- sorry, we may well have received</b></p> <p>4 <b>evidence in my mind to be able to prove a substantive</b></p> <p>5 <b>criminal conspiracy. Specifically in relation,</b></p> <p>6 <b>obviously, to the escape but it might have been in</b></p> <p>7 <b>relation to other serious criminality that we could have</b></p> <p>8 <b>acted upon. So that is that.</b></p> <p>9 <b>There is also -- sorry, you didn't ask about</b></p> <p>10 <b>geographical tipping points, but that is obviously</b></p> <p>11 <b>another issue.</b></p> <p>12 Q. Please tell us.</p> <p>13 <b>A. That is another area of tipping points under</b></p> <p>14 <b>consideration and that was how long would I leave it, as</b></p> <p>15 <b>the tactical firearms commander, if I had not received</b></p> <p>16 <b>the intelligence or the evidential tipping points to</b></p> <p>17 <b>give a decision, a direction to arrest or detain, if the</b></p> <p>18 <b>van was on the move, and so the vehicles were coming</b></p> <p>19 <b>closer together.</b></p> <p>20 Q. Yes.</p> <p>21 <b>A. How long would I leave it? And that is something I gave</b></p> <p>22 <b>consideration to.</b></p> <p>23 Q. So --</p> <p>24 <b>A. In relation specifically to the time you were speaking</b></p> <p>25 <b>about, around 8/9 December, I probably hadn't finalised</b></p> <p style="text-align: center;">Page 147</p>	<p>1 <b>that, but I was aware that that was something I had to</b></p> <p>2 <b>finalise and by the time we got to 11 December, I had in</b></p> <p>3 <b>my mind decided where that cut off point was going to</b></p> <p>4 <b>be.</b></p> <p>5 Q. Is that how you have described it to us now or was there</p> <p>6 further development of what you have described now by</p> <p>7 the time that we reach --</p> <p>8 <b>A. That is how I described, I just had a definitive point</b></p> <p>9 <b>geographically in my mind where that was going to be,</b></p> <p>10 <b>and that was going to be the A1 junction of the A406.</b></p> <p>11 Q. Right.</p> <p>12 From what you have just explained, if during the</p> <p>13 course of the morning, and before let's say for instance</p> <p>14 the van had left the prison, if information came to you</p> <p>15 that there was a firearm in the Audi vehicle, would you</p> <p>16 have acted upon that or would you have waited for there</p> <p>17 to be additional evidential material relating to the</p> <p>18 escape plan?</p> <p>19 <b>A. If I was -- if I was presented with compelling</b></p> <p>20 <b>intelligence or evidence that there was a viable firearm</b></p> <p>21 <b>in that vehicle, I would have acted at the earliest</b></p> <p>22 <b>opportunity.</b></p> <p>23 Q. Immediately?</p> <p>24 <b>A. Yes, if it was safe to do so.</b></p> <p>25 Q. We know that in relation to your application sent out on</p> <p style="text-align: center;">Page 148</p>

37 (Pages 145 to 148)

<p>1 7 December there was a corresponding FA3 document that 2 was prepared and submitted by Mr Turner on the same day. 3 Did that come to you on the 7th? 4 <b>A. Was that -- I think that may well have been in relation 5 to the technical deployment on the day.</b> 6 Q. I understand. In any event, and we touched upon this 7 this morning, although you made your initial application 8 for deployment on 11 December on the 7th, you went back 9 on the 10th and you updated it. 10 <b>A. That was at Mr Turner's behest.</b> 11 Q. What did he say to you to prompt you to do that? 12 <b>A. Well, he was keen to know were there any specific 13 intelligence updates, specifically in relation to 14 firearms.</b> 15 Q. Yes, right. 16 <b>A. And obviously to update the fact that we obviously made 17 the -- excuse me -- the approaches and got the requisite 18 authorities from the court and the prison.</b> 19 Q. From the court and the prison? 20 <b>A. Yes.</b> 21 Q. Could we put up, please, IPC1086, at page 6. 22 THE CHAIRMAN: Behind divider 22? 23 MS BLACKWELL: Yes, sir. 24 THE CHAIRMAN: Thank you. 25 MS BLACKWELL: I am displaying this so that we can follow</p> <p style="text-align: center;">Page 149</p>	<p>1 what you have just said. This is the update, isn't it, 2 that you put on the form as you have now explained at 3 the behest of Mr Turner: 4 "There have been no intelligence updates since 5 7 December 2015 to indicate any change in the intentions 6 of the conspirators. The identities of the team 7 recruited for this task remains unknown. Authority was 8 granted on 10 December 2015 by Lord Justice Peter Gross, 9 the senior presiding judge for the deployments of both 10 overt and covert armed officers at Wood Green Crown 11 Court." 12 That was the update, and it was right that you 13 provided that update and in turn Mr Turner also provided 14 an additional FA3, didn't he? 15 <b>A. That's correct, yes.</b> 16 Q. Yes. 17 Since your completion of the FA2 form on 7 December, 18 had there been any update by way of intelligence? 19 <b>A. Not by the time that this was submitted, I think 10am on 20 10 December. That I was aware of or I recall.</b> 21 Q. I just want to go back, please, to page 2 of this 22 document. 23 It appears that someone has worked out that the 24 wrong operation name was on there, because this version 25 of the document bears the correct name, Operation Ankaa.</p> <p style="text-align: center;">Page 150</p>
<p>1 <b>A. That's correct.</b> 2 Q. Do you think that you had worked that out and changed 3 the name? 4 <b>A. I would like to think I had but I have forgotten about 5 it.</b> 6 Q. Perhaps that is understandable. 7 What I would like to ask you about is the 8 information, or rather lack of information, that we see 9 in the box identifying the operational commander or the 10 OFC. By 10 December, so the day before the operation, 11 were you yet to identify who was going to fulfil the 12 role of operational firearms commander? 13 <b>A. I believe that would have been allocated and I could 14 have obtained that information and put that on the front 15 page.</b> 16 <b>Sometimes in the body of the application, in terms 17 of the command structure, I put it in there, as well, 18 I am presuming you have looked there and it is not there 19 either?</b> 20 Q. No. 21 <b>A. That is something ordinarily I would do.</b> 22 Q. Yes. 23 <b>A. Obviously this was in addition to the form I did on 24 7 December.</b> 25 Q. Yes.</p> <p style="text-align: center;">Page 151</p>	<p>1 <b>A. And I -- in resubmitting it to Mr Turner in order that 2 he could expedite his decision whether to authorise it, 3 I didn't make that enquiry.</b> 4 Q. Had an OFC been identified? 5 <b>A. I believe they were, I believe they were identified.</b> 6 Q. So the omission is only in relation to not putting the 7 name on the form? 8 <b>A. That is my evidence, yes.</b> 9 Q. Because it was rather late in the day, wasn't it, to 10 start identifying somebody to fulfil that role, you 11 would expect that that had taken place by then? 12 <b>A. That's correct, yes.</b> 13 Q. Completing this additional form, also gave you the 14 opportunity to document and record your current thoughts 15 now, the day before the operation, as to tipping points 16 and evidential thresholds. Do you agree? 17 <b>A. I could have put them on here, obviously I would record 18 it on my operational log on the morning of the 11th, but 19 I could have included it on here as well.</b> 20 Q. They are not there, are they? 21 <b>A. They are not there, no.</b> 22 Q. No. 23 One of the difficulties in not recording what is in 24 your mind and what is in your plan for a tipping point 25 or an evidential threshold being reached, is that there</p> <p style="text-align: center;">Page 152</p>

<p>1 is no opportunity for your thoughts and actions and aims 2 to be considered and approved or rejected by the 3 strategic firearms commander, is there? 4 <b>A. I remember specifically that was a discussion we had 5 around tipping points.</b> 6 Q. You may have had a discussion with Mr Turner about it -- 7 <b>A. Yes.</b> 8 Q. -- but there is no evidence of that, is there? 9 <b>A. That is a fair comment.</b> 10 Q. Right. 11 Equally, without anything in relation to tipping 12 points or evidential thresholds being documented, it 13 makes it far more difficult for that information to be 14 briefed to the officers on the ground, doesn't it? 15 <b>A. In terms of the evidential or intelligence tipping 16 points, the way that that is briefed to the officers on 17 the ground is when the TFC comes to the decision that 18 they have either sufficiency of evidence or 19 intelligence, the TFC would make the decision.</b> 20 <b>I wouldn't expect -- I am sure when you speak to the 21 SFO officers in this inquiry, I would be very surprised 22 if they expected to be informed of the precise tipping 23 points.</b> 24 MS BLACKWELL: Sir, I know it is a little early, we have 25 only been going for an hour or so but could we have our</p> <p style="text-align: center;">Page 153</p>	<p>1 afternoon -- 2 THE CHAIRMAN: We have early breaks, we have late breaks. 3 Shall we resume at 3.00? 4 MS BLACKWELL: Thank you. 5 THE CHAIRMAN: Very good. 6 (2.48 pm) 7 (A short adjournment) 8 (3.15 pm) 9 THE CHAIRMAN: Sorry to have kept you waiting. It is 10 entirely my fault. 11 MS BLACKWELL: Sir, thank you very much for the additional 12 time that you have allowed us to take. In fact it has 13 enabled me to speak to other core participants and we 14 are confident that we are not long off finishing now. 15 I have been invited to ask some additional 16 questions, both on behalf of the family and on behalf of 17 the MPS. 18 THE CHAIRMAN: Just for the avoidance of doubt, of course, 19 Mr Williams will be returning on another day to deal 20 with the events of the 11th. 21 MS BLACKWELL: That's right, but we have tried as much as we 22 can to use the time in the break to identify anything 23 that is outstanding up until the point of 11 December, 24 which is what Mr Williams will be giving evidence about 25 when he comes back.</p> <p style="text-align: center;">Page 154</p>
<p>1 THE CHAIRMAN: Yes, so any additional questions from anybody 2 else will not of course cover 11 December, because you 3 have not asked him any questions about that. 4 MS BLACKWELL: Quite. 5 THE CHAIRMAN: Very good. Thank you. 6 MS BLACKWELL: Mr Williams, I would like to ask you some 7 additional questions about Ozcan Eren and we have 8 established both this morning and in this afternoon's 9 session that despite there being intelligence and 10 information that he had access to firearms, and indeed 11 in July 2015 he had access to a firearm himself, it 12 wasn't thought appropriate to make an application for 13 the surveillance in relation to that individual to have 14 the added support of the MASTS team? 15 <b>A. That's correct, yes.</b> 16 Q. Can you confirm an item of information which was 17 provided to the inquiry yesterday by Mr Jopling, that 18 although there was intelligence that at about 6.00 on 19 the morning of 11 December Mr Eren was in the Tottenham 20 area, he was not sighted by any surveillance officer 21 until 9.17? 22 <b>A. That would be correct, yes.</b> 23 Q. And, upon the incident taking place on Bracknell Close, 24 and Mr Ozcan Eren being sighted again, was it at that 25 stage that the additional security element of the MASTS</p> <p style="text-align: center;">Page 155</p>	<p>1 team was used in relation to him? Were the MASTS team 2 sent off to cover him at that stage? 3 <b>A. No, the MASTS team remained on the prison van. We are 4 drifting towards the 11th, aren't we?</b> 5 Q. Yes, we are, I am sorry, it was really just to try and 6 establish that at some point there was an armed level of 7 support on him that morning. 8 <b>A. My recollection is that his arrest was conducted by ARV 9 officers.</b> 10 Q. Okay, thanks. I am not going to push that any further 11 today. 12 THE CHAIRMAN: No. 13 MS BLACKWELL: We have seen in your FA2 form what appears to 14 be a grading of the intelligence that you have set out 15 there. It looks as if -- and I can take you to it if 16 you wish, but the grading, the intelligence has been 17 graded by you as A1. 18 <b>A. That's correct. Yes.</b> 19 Q. Is that right? 20 Have you seen, and again I can put these up if you 21 want to, the two CRIMINT reports that were generated 22 throughout the course of this operation? 23 <b>A. I am happy to see them again, thank you.</b> 24 Q. Let me do that, because it is probably just as well that 25 we display them. The first, please, Mr Coates is</p> <p style="text-align: center;">Page 156</p>

<p>1 MPS368.</p> <p>2 Could we put the second page side by side, please.</p> <p>3 Thank you.</p> <p>4 This is the first form of words that was broken out</p> <p>5 in a CRIMINT report. We can see on the page displayed</p> <p>6 on the left-hand side, the event date is</p> <p>7 30 October 2015, and indeed you have made reference to</p> <p>8 this throughout the course of your evidence and I have</p> <p>9 asked you questions about it.</p> <p>10 The form of words provided on this report is on the</p> <p>11 right-hand side page:</p> <p>12 "Intelligence indicates that Izzet Eren will escape</p> <p>13 from custody whilst in transit."</p> <p>14 That has been given a valuation, if we look back at</p> <p>15 the left hand page as B, 2, 5, and you understand the</p> <p>16 five-by-five-by-five grading system, don't you?</p> <p>17 <b>A. Yes, I do.</b></p> <p>18 Q. Right.</p> <p>19 Let's take that down and let's put up, please,</p> <p>20 IPC1086, at page 3.</p> <p>21 Thank you.</p> <p>22 What we see here is the information/intelligence box</p> <p>23 at the lower part of the page and you are describing</p> <p>24 Izzet Eren and Erwin Amoyaw-Gyamfi being arrested on</p> <p>25 their bikes and they have got firearms with them and we</p> <p style="text-align: center;">Page 157</p>	<p>1 have been through the details of that.</p> <p>2 Now, that is graded as A1, by you. Is that because</p> <p>3 you were personally involved in the arrest?</p> <p>4 <b>A. Yes. I mean I -- obviously I have only made one grading</b></p> <p>5 <b>throughout the whole of the narrative on that form.</b></p> <p>6 Q. And that is that?</p> <p>7 <b>A. As A1. That's correct, that is that.</b></p> <p>8 <b>In relation to that, it is really the whole piece in</b></p> <p>9 <b>my grading as A1.</b></p> <p>10 THE CHAIRMAN: Does it become A1 because it is a fact? It</p> <p>11 has happened?</p> <p>12 <b>A. In my view, that -- yes, you are absolutely right.</b></p> <p>13 THE CHAIRMAN: So it is not intelligence at all, it is</p> <p>14 a fact?</p> <p>15 <b>A. That's correct.</b></p> <p>16 THE CHAIRMAN: Yes.</p> <p>17 MS BLACKWELL: Thank you, can we look at IPC82, please,</p> <p>18 which is the MPS SOP. Could we have a look at page 10.</p> <p>19 Thank you. Paragraph 7.9:</p> <p>20 "In firearms-related situations, information and</p> <p>21 intelligence combined with the experience of those</p> <p>22 responsible for directing the police response will</p> <p>23 assist in determining the most appropriate response in</p> <p>24 a given situation. The assessment of information is</p> <p>25 a dynamic and continuing process throughout the life of</p> <p style="text-align: center;">Page 158</p>
<p>1 an incident or operation, all involved have</p> <p>2 a responsibility for updating information and ensuring</p> <p>3 that insofar as possible there is a full intelligence</p> <p>4 picture and that this is conveyed as appropriate to</p> <p>5 those involved."</p> <p>6 The TFC must ensure that, as far as time permits,</p> <p>7 information and intelligence is appropriately assessed,</p> <p>8 graded and where possible verified. Information and</p> <p>9 intelligence should be passed to officers as necessary</p> <p>10 for the roles they are performing.</p> <p>11 "Where only limited information is available, it is</p> <p>12 important to establish and maintain an effective</p> <p>13 information gathering process at an early stage. In</p> <p>14 a protracted or more complex incident, there may be</p> <p>15 a need to establish a dedicated intelligence function in</p> <p>16 support of the tactical firearms commander."</p> <p>17 Can we go forwards, please, for the sake of</p> <p>18 completeness to paragraph 7.53. Thank you:</p> <p>19 "If the intelligence is from sensitive sources,</p> <p>20 firewalls to protect the integrity of this information</p> <p>21 for briefing purposes will be put into place. The</p> <p>22 intelligence picture will be agreed by the SIO and TFC</p> <p>23 prior to the commencement of the briefing in a form of</p> <p>24 words making no reference to the sources of the</p> <p>25 intelligence. This will help to ensure both the</p> <p style="text-align: center;">Page 159</p>	<p>1 accuracy of intelligence and protection of sensitive</p> <p>2 sources. It is that form of words that will be given at</p> <p>3 the briefing."</p> <p>4 That takes us a stage further into the appropriate</p> <p>5 actions and procedures that should be adopted in terms</p> <p>6 of briefing officers with forms of words.</p> <p>7 As you have accepted, the place that we have looked</p> <p>8 at on the FA2 form where we see the grading as being A1,</p> <p>9 is the only grading that you have undertaken in relation</p> <p>10 to this form.</p> <p>11 The MPS SOP that we have just looked at indicates</p> <p>12 that there should be a full and continuing grading of</p> <p>13 intelligence that information, as the operation</p> <p>14 progresses, do you agree?</p> <p>15 <b>A. I do agree, yes.</b></p> <p>16 Q. Right.</p> <p>17 Did you, during the course of this operation, and in</p> <p>18 preparing for what took place on 11 December, perform</p> <p>19 that exercise in that, did you grade the intelligence</p> <p>20 that you were receiving and did you continue to assess</p> <p>21 the gradings that you had given it throughout the course</p> <p>22 of the operation?</p> <p>23 <b>A. Not by way of formal documentation.</b></p> <p>24 Q. What does that mean?</p> <p>25 <b>A. Well, obviously, you showed me a CRIMINT in relation to</b></p> <p style="text-align: center;">Page 160</p>

40 (Pages 157 to 160)



<p>1 <b>that.</b></p> <p>2 Q. Yes.</p> <p>3 <b>A. Which was a dissemination which was specifically</b></p> <p>4 <b>provided -- we weren't, as a matter of course, provided</b></p> <p>5 <b>with those CRIMINTs.</b></p> <p>6 Q. But we have looked at documentation that you have</p> <p>7 prepared, we have looked at two FA2 documents, we have</p> <p>8 looked at some notes that you made in relation to the</p> <p>9 incident on 13 October. There are repeated references</p> <p>10 to "intelligence".</p> <p>11 <b>A. That's correct, yes.</b></p> <p>12 Q. Have you performed that role with those pieces of</p> <p>13 intelligence, have you graded them and then reviewed</p> <p>14 them?</p> <p>15 <b>A. I have certainly reviewed and I have referred to them in</b></p> <p>16 <b>my FA form. Have I graded them specifically? No.</b></p> <p>17 Q. Do you accept that, according to the MPS SOP, that is</p> <p>18 an additional task that falls to the tactical firearms</p> <p>19 commander?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Thank you.</p> <p>22 THE CHAIRMAN: And your explanation for not having graded</p> <p>23 it?</p> <p>24 <b>A. It is a little bit difficult to say in this forum, I am</b></p> <p>25 <b>afraid, sir.</b></p> <p style="text-align: center;">Page 161</p>	<p>1 THE CHAIRMAN: Then it can be said at another time then.</p> <p>2 Thank you.</p> <p>3 MS BLACKWELL: Can we put up IPC385, page 8.</p> <p>4 This is part of the report from Mr Hartley, who was</p> <p>5 invited to assist the IPCC investigation as a policing</p> <p>6 expert. In relation to what appears on this sheet, we</p> <p>7 can see 1 November 2015 --</p> <p>8 THE CHAIRMAN: Can I have the page, please?</p> <p>9 MS BLACKWELL: Yes, this doesn't appear in our hard copy</p> <p>10 bundle, sir, but we can provide a hard copy for you.</p> <p>11 THE CHAIRMAN: It is all right. That is fine.</p> <p>12 MS BLACKWELL: Assumption close to fact:</p> <p>13 "Intelligence suggested that Izzet Eren was in</p> <p>14 contact with his brother Ozcan Eren conspiring to</p> <p>15 facilitate his escape on 1 November 2015 by means of</p> <p>16 Ozcan Eren coordinating a team of unknown individuals to</p> <p>17 carry out this act. They had access to a stolen vehicle</p> <p>18 and weapons, including a firearm. One of that team</p> <p>19 however was not prepared to assist and the attempt was</p> <p>20 aborted until Friday, 11 December 2015:</p> <p>21 "This intelligence is assumption very close to fact</p> <p>22 and is a firm foundation to build a policing response</p> <p>23 from, particularly when considered in the context of</p> <p>24 Article 2 Human Rights Act and the associated positive</p> <p>25 and negative obligations.</p> <p style="text-align: center;">Page 162</p>
<p>1 "Fact: following this the stolen vehicle, a black</p> <p>2 Audi A6, was located and due to the proximity of the car</p> <p>3 to Wood Green Crown Court, was placed under technical</p> <p>4 control by means of an audio probe."</p> <p>5 What Mr Hartley appears to be doing here is</p> <p>6 assessing the level of intelligence that is being</p> <p>7 provided and separating it out into that which is</p> <p>8 assumption close to fact and that which can be extracted</p> <p>9 as fact.</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. I am displaying this to give you an example of the way</p> <p>12 in which you could have performed the same exercise in</p> <p>13 relation to the intelligence that was provided to you</p> <p>14 during the course of the operation. Do you accept that</p> <p>15 this is an effective way in which to assess the level of</p> <p>16 the intelligence?</p> <p>17 <b>A. Yes, I do accept that, and I have not seen it done like</b></p> <p>18 <b>this before, until I read his report.</b></p> <p>19 Q. Right, thank you very much.</p> <p>20 Also contained within this report, and I am not</p> <p>21 going to ask that it be displayed, this can be taken</p> <p>22 down now, please, is an indication by Mr Hartley that</p> <p>23 the assessment of risk and the threat level posed by</p> <p>24 an operation needs to be viewed in a 360-degree manner.</p> <p>25 I am going to suggest that that dovetails with what we</p> <p style="text-align: center;">Page 163</p>	<p>1 have seen of the national decision model, the circular</p> <p>2 basis, the fact that one needs to be aware that, as</p> <p>3 an operation progresses, there is a continuous need to</p> <p>4 assess it.</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Do you believe that that is how you assessed the level</p> <p>7 of risk and threat over the course of your operation?</p> <p>8 <b>A. Yes, I mean obviously on the FA2, as we discussed</b></p> <p>9 <b>earlier, the threat was based upon the commencement of</b></p> <p>10 <b>the surveillance gathering -- sorry, the surveillance</b></p> <p>11 <b>operation to gather evidence. And also we have spoken</b></p> <p>12 <b>about the only other reference really is at the point</b></p> <p>13 <b>where I made a decision to arrest the occupants of the</b></p> <p>14 <b>car.</b></p> <p>15 <b>In between, that was a continuing determination, and</b></p> <p>16 <b>I didn't feel the need to specifically document that,</b></p> <p>17 <b>but in relation to my documentation during the day,</b></p> <p>18 <b>I talk about the national decision model being</b></p> <p>19 <b>considered and applied and the review of the threat</b></p> <p>20 <b>assessment would have formed part of that review of the</b></p> <p>21 <b>NDM process.</b></p> <p>22 <b>Obviously, when considering threat and the harm and</b></p> <p>23 <b>the consequences of that potential threat, as -- I might</b></p> <p>24 <b>have mentioned earlier today, it is about immediacy and</b></p> <p>25 <b>whilst the prison van is at Wormwood Scrubs, in my view</b></p> <p style="text-align: center;">Page 164</p>

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<p>1 <b>the threat remained low and obviously again with</b></p> <p>2 <b>reference to the geographical tipping points we have</b></p> <p>3 <b>spoken about, that threat remained low because there was</b></p> <p>4 <b>still in my view at the time the officers went forward</b></p> <p>5 <b>on 11 December, there was still sufficient time to do</b></p> <p>6 <b>that safely.</b></p> <p>7 Q. You have been asked whether consideration was given to</p> <p>8 what tactics would be implemented and you have said that</p> <p>9 you didn't know when and in what circumstances the</p> <p>10 tipping points might be reached?</p> <p>11 <b>A. That's correct, yes.</b></p> <p>12 Q. Did you receive tactical advice?</p> <p>13 <b>A. Yes, obviously we made reference to the FA5 and I had</b></p> <p>14 <b>tactical advice through the morning.</b></p> <p>15 Q. Right, that is what I wanted to ask you.</p> <p>16 In addition to the FA5s that were provided to you</p> <p>17 during the course of this operation, did you also speak</p> <p>18 to S48 over the course of the --</p> <p>19 <b>A. On a regular base, yes.</b></p> <p>20 Q. Let's just look, please at IPC1133, page 9. This is the</p> <p>21 FA5, or one of the FA5s, the tactical advice document.</p> <p>22 We can see that under the heading "Implications and</p> <p>23 considerations" there are a number of bullet points:</p> <p>24 "The support of a MASTS team would enable firearms</p> <p>25 commanders to test evidential thresholds and</p> <p style="text-align: center;">Page 165</p>	<p>1 intelligence sources to ensure evidential and/or</p> <p>2 positive identification requirements are satisfied.</p> <p>3 "A response capability is in place to prevent</p> <p>4 violence to any person which satisfies the ECHR/HRA</p> <p>5 principles.</p> <p>6 "A covert policing operation may assist with</p> <p>7 identification of the subjects and intelligence</p> <p>8 gathering around their intentions.</p> <p>9 "The deployment of armed surveillance and firearms</p> <p>10 teams, with the necessary support and command</p> <p>11 functions ..."</p> <p>12 Then:</p> <p>13 "Dedicated surveillance officers and covert firearms</p> <p>14 officers are interoperable in terms of tactical</p> <p>15 deployment and communication.</p> <p>16 "This deployment option relies upon surveillance</p> <p>17 control being maintained and the provision of</p> <p>18 intelligence and information updates to ensure support</p> <p>19 teams are correctly located to deliver tactical options.</p> <p>20 "If the commission of an offence by the subject is</p> <p>21 a possibility it may not be possible to guarantee the</p> <p>22 interception of the subjects prior to the offence taking</p> <p>23 place.</p> <p>24 "If armed operation is conducted in the public</p> <p>25 domain with associated risks to pedestrians and</p> <p style="text-align: center;">Page 166</p>
<p>1 motorists, and police tactics aim to mitigate any danger</p> <p>2 or intrusion involving innocent members of the public</p> <p>3 with the application of containment and control."</p> <p>4 Do you recollect reading those implications and</p> <p>5 considerations in the FA5 document?</p> <p>6 <b>A. Yes, I will have read them, yes.</b></p> <p>7 Q. And did you consider the issues raised by what is set</p> <p>8 out in those bullet points?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Did you consider for instance the options for an arrest</p> <p>11 on foot?</p> <p>12 <b>A. That was always a potential opposite to us, depending on</b></p> <p>13 <b>when the tipping points may come. So, for example, the</b></p> <p>14 <b>prison van was delayed leaving Wormwood Scrubs, subjects</b></p> <p>15 <b>were in a vehicle, they decide to get out of the vehicle</b></p> <p>16 <b>because of the time delay. The tipping point comes</b></p> <p>17 <b>whilst they are away from the vehicle, so then I would</b></p> <p>18 <b>direct an interception on foot.</b></p> <p>19 Q. Or an arrest in the vehicle, which is what happened,</p> <p>20 that was a consideration?</p> <p>21 <b>A. That was a consideration.</b></p> <p>22 Q. Or an arrest in a building?</p> <p>23 <b>A. Buildings have a specific tactical parameter that I was</b></p> <p>24 <b>given by Mr Turner, only if there was immediate threat</b></p> <p>25 <b>to life or in order to prevent immediate threat to life</b></p> <p style="text-align: center;">Page 167</p>	<p>1 <b>or serious harm.</b></p> <p>2 Q. In relation to those three possibilities, on foot, in</p> <p>3 a vehicle, in a building, did you consider the use of</p> <p>4 various tactics both in relation to containment and call</p> <p>5 out and also in relation to an extraction?</p> <p>6 <b>A. They are options available to me.</b></p> <p>7 Q. Did you consider them?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Thank you.</p> <p>10 Can we take that down, please, and can we put up</p> <p>11 MPS3577.</p> <p>12 Next page, please.</p> <p>13 This is your operation log. Could we just scroll</p> <p>14 out, please, Mr Coates.</p> <p>15 Thank you, I am being invited to --</p> <p>16 THE CHAIRMAN: This does say 11 December, does it?</p> <p>17 <b>A. That is, yes, it is just my poor handwriting, sir.</b></p> <p>18 THE CHAIRMAN: I am just wondering whether if it says the</p> <p>19 11th, it is something you want to cover.</p> <p>20 MS BLACKWELL: Could we just scroll through to pages 2 and</p> <p>21 3, please.</p> <p>22 Yes, this does refer to tipping points in relation</p> <p>23 to 11 December, but as it is a document that's created</p> <p>24 on that date, I think in fairness to you, Mr Williams,</p> <p>25 we will leave this until you return to give us your</p> <p style="text-align: center;">Page 168</p>

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<p>1 evidence on that date. In the meantime, if you can 2 refresh your memory as to what this document contains, 3 that would be very helpful.</p> <p>4 <b>A. Okay.</b></p> <p>5 Q. Thank you.</p> <p>6 I asked you some questions about the briefing that 7 you gave to Mr Justice Sweeney.</p> <p>8 Could we please display IPC1091.</p> <p>9 Thank you. And the reference to:</p> <p>10 "Intelligence suggests that those seeking to carry 11 out this offence will be in possession of firearms and 12 other weapons."</p> <p>13 We have looked at this already?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. We can see that that is in relation to what appears 16 towards the bottom of the page.</p> <p>17 Looking at some of the intelligence that you had at 18 your disposal, you knew, because you had been involved 19 in the circumstances of the arrests of Izzet Eren and 20 Erwin Amoyaw-Gyamfi on 13 October, and the fact that 21 they had been in possession of firearms.</p> <p>22 You were also aware that Sinan Ozger was somebody 23 who had been involved in the events of that night.</p> <p>24 <b>A. That's correct, yes.</b></p> <p>25 Q. I think it had come to your attention that he may have</p> <p style="text-align: center;">Page 169</p>	<p>1 provided or supplied the weapons?</p> <p>2 <b>A. That's correct, yes.</b></p> <p>3 Q. Yes.</p> <p>4 You had heard about the aborted attempt to spring 5 Izzet Eren on 29 October?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Was there any more intelligence about Sinan Ozger, other 8 than that which came to your attention about his 9 involvement on 13 October?</p> <p>10 <b>A. There was intelligence. We may have referred to it 11 earlier today, there was intelligence around the end of 12 November that he was engaged in firearms trafficking.</b></p> <p>13 Q. And there are other matters which you have also 14 mentioned about your understanding that this gang in 15 particular had access to firearms?</p> <p>16 <b>A. That's correct, yes.</b></p> <p>17 Q. When you placed on the form the following words: 18 "Intelligence suggests those seeking to carry out 19 this offence will be in possession of FA and other 20 weapons." 21 Was that based upon your knowledge of what I am 22 going to describe as the surrounding circumstances?</p> <p>23 <b>A. I think that is a fair comment, yes.</b></p> <p>24 Q. Yes. Just to confirm that at this time, when this 25 application was being made, and indeed when your final</p> <p style="text-align: center;">Page 170</p>
<p>1 FA2 form is being completed on 10 December, you did not 2 have any intelligence or information that a firearm 3 would be used?</p> <p>4 <b>A. No, that's correct.</b></p> <p>5 MS BLACKWELL: All right thank you.</p> <p>6 Sir, that concludes my questioning. I have been 7 asked by my learned friend Ms Kaufmann if she may ask 8 questions in relation to two specific areas.</p> <p>9 One is the prospect of an intervention and/or 10 an interception taking place on the morning of 11 11 December.</p> <p>12 The other is to put some additional material to 13 Mr Williams about the danger of double hatting.</p> <p>14 I have agreed that, in relation to those two 15 discrete areas, she may be permitted to put those 16 questions. I hope that you agree that that is 17 appropriate?</p> <p>18 THE CHAIRMAN: I do but it is limited, subject to any 19 further agreement, to those two topics.</p> <p>20 MS BLACKWELL: Thank you.</p> <p>21 Questions from MS KAUFMANN</p> <p>22 MS KAUFMANN: On that point of further agreement, sir, 23 Ms Blackwell has just touched upon intelligence 24 gathering and grading, which of course she hadn't 25 touched on before and I just wondered whether I could</p> <p style="text-align: center;">Page 171</p>	<p>1 just ask a couple of questions on the FA form which 2 relates to the grading and the evidence that has just 3 been given by Mr Williams.</p> <p>4 THE CHAIRMAN: Any observations?</p> <p>5 MS BLACKWELL: As long as it is only a couple of questions.</p> <p>6 MS KAUFMANN: It will not be long.</p> <p>7 THE CHAIRMAN: Thank you.</p> <p>8 MS KAUFMANN: I am going to start with that, Mr Williams.</p> <p>9 If we could have IPC1083, and if we could start at 10 page -- sorry, my computer is being very slow. 11 If we could start at page 4 of that document, 12 I think.</p> <p>13 Actually if you could start at page 3 for me, then 14 I think we could see the A1 grading. Yes, we can see 15 the A1 grading. We can see that that grading is at the 16 point at which you are referring to 13 October offence?</p> <p>17 <b>A. That's correct, yes.</b></p> <p>18 Q. But I think you said in answer to a question from 19 Ms Blackwell that your A1 grading related to all the 20 intelligence set out in that entire block of text?</p> <p>21 <b>A. It was a collective assessment on my behalf.</b></p> <p>22 Q. Exactly, so it wasn't just on the basis that what was 23 set out there in relation to 13 October was fact, it had 24 happened. It was in relation to things that were not 25 yet fact but were intelligence relating to future</p> <p style="text-align: center;">Page 172</p>

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<p>1 intentions and actions?</p> <p>2 <b>A. It was a basis of fact and my assessment of the</b></p> <p>3 <b>intelligence.</b></p> <p>4 THE CHAIRMAN: It was both?</p> <p>5 MS KAUFMANN: It was both, wasn't it?</p> <p>6 THE CHAIRMAN: You have agreed I think with Ms Kaufmann that</p> <p>7 it was not just that which had happened and could</p> <p>8 properly be categorised as A1 because it was a fact, it</p> <p>9 was your assessment of other intelligence as well?</p> <p>10 <b>A. Of the overall picture, yes.</b></p> <p>11 THE CHAIRMAN: Yes.</p> <p>12 MS KAUFMANN: Yes, so if we go on to the next page, just to</p> <p>13 make this absolutely clear, we can see among the</p> <p>14 intelligence that is set out, we have:</p> <p>15 "Intelligence received on 29 or 30 October indicated</p> <p>16 that Sinan Ozger has been engaged in the movement and</p> <p>17 safekeeping of firearms and it was Ozger who performed</p> <p>18 the same function prior to Izzet's arrest."</p> <p>19 That is not matters that you could assert as fact,</p> <p>20 is it? It is intelligence that you graded as A1?</p> <p>21 <b>A. That's correct, yes.</b></p> <p>22 Q. Similarly:</p> <p>23 "Intelligence received on 3 December indicated that</p> <p>24 Ozcan Eren is still in contact with Izzet and is putting</p> <p>25 a team together of suitable individuals."</p> <p style="text-align: center;">Page 173</p>	<p>1 Then further down at the bottom of the page:</p> <p>2 "Intelligence received today has confirmed the</p> <p>3 offence is still planned."</p> <p>4 All of that you graded at A1?</p> <p>5 <b>A. That's correct, yes.</b></p> <p>6 Q. I think Ms Blackwell took you to the CRIMINT, which was</p> <p>7 the first recording in any formal -- almost the only</p> <p>8 recording in any formal shape of the intelligence</p> <p>9 received from 30 October onwards until 11 December. She</p> <p>10 showed you the grading of that intelligence about the</p> <p>11 intended escape plan for 11 December, and that was</p> <p>12 graded at B, 2, 5, wasn't it?</p> <p>13 <b>A. That's correct, yes.</b></p> <p>14 Q. On what basis was your grading so very profoundly</p> <p>15 different, given the five-by-five-by-five matrix that</p> <p>16 you explained you understand?</p> <p>17 <b>A. I think it was six weeks' difference -- I think --</b></p> <p>18 Q. Yes.</p> <p>19 <b>A. So events and intelligence had moved on. Which in my</b></p> <p>20 <b>opinion pushed the overall picture and the assessment</b></p> <p>21 <b>I gave it to an A1 grading.</b></p> <p>22 Q. Had the sources of the intelligence changed? Because A</p> <p>23 and B relate to the source of the intelligence, don't</p> <p>24 they?</p> <p>25 <b>A. That's correct.</b></p> <p style="text-align: center;">Page 174</p>
<p>1 THE CHAIRMAN: I thought that the evidence was, just</p> <p>2 a moment, please -- that B, 2, 5 was everything, covered</p> <p>3 everything that was in a form of words?</p> <p>4 MS KAUFMANN: No B, 2, 5 covered the intelligence in the</p> <p>5 CRIMINT that we saw, which indicated that there was</p> <p>6 a plan --</p> <p>7 THE CHAIRMAN: My understanding was, and I will be corrected</p> <p>8 if I am wrong, that B, 2, 5 was the formula used to</p> <p>9 assess the quality of every form of words.</p> <p>10 MS KAUFMANN: No, B, 2, 5 is the application of the</p> <p>11 five-by-five matrix to a piece of intelligence or</p> <p>12 information and it has to be graded, so a form of words</p> <p>13 arises out of an intelligence, a piece of intelligence</p> <p>14 that is analysed under the five-by-five-by-five matrix.</p> <p>15 Once it has been analysed, that process of analysis,</p> <p>16 we can see the five-by-five-by-five matrix if you would</p> <p>17 like to --</p> <p>18 THE CHAIRMAN: No, I don't need to, because we have</p> <p>19 discussed it.</p> <p>20 MS KAUFMANN: You have looked at it all.</p> <p>21 THE CHAIRMAN: Yes.</p> <p>22 MS KAUFMANN: So whether or not it results in a form of</p> <p>23 words, the five-by-five matrix applies to all</p> <p>24 intelligence --</p> <p>25 THE CHAIRMAN: Very good.</p> <p style="text-align: center;">Page 175</p>	<p>1 MS KAUFMANN: -- so it is then graded according to that</p> <p>2 matrix.</p> <p>3 THE CHAIRMAN: Thank you. My misunderstanding, thank you.</p> <p>4 MS KAUFMANN: So the source hadn't changed?</p> <p>5 <b>A. I make that assessment. I was making that assessment</b></p> <p>6 <b>and I was not the author of the assessment on the</b></p> <p>7 <b>30 October.</b></p> <p>8 Q. But on the basis of the five-by-five-by-five matrix, an</p> <p>9 A grading is effectively, as the chair indicated</p> <p>10 earlier, something that it is possible to assert as</p> <p>11 fact, because either you, the person who is describing</p> <p>12 the intelligence, witnessed it directly, and therefore</p> <p>13 it is not secondhand hearsay, or it is such that even</p> <p>14 though you are the recipient, it is as clear as and as</p> <p>15 certain as fact.</p> <p>16 Now --</p> <p>17 <b>A. I will say the latter in this case.</b></p> <p>18 THE CHAIRMAN: Yes.</p> <p>19 MS KAUFMANN: That is all I then need to address in relation</p> <p>20 to that.</p> <p>21 THE CHAIRMAN: Thank you.</p> <p>22 MS KAUFMANN: Can we move on to the spontaneous incident on</p> <p>23 13 October when Izzet Eren was arrested.</p> <p>24 We know that you didn't complete any forms in</p> <p>25 relation to that incident, we have seen your log earlier</p> <p style="text-align: center;">Page 176</p>

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<p>1 on. Can I ask you to look, please, at IPC406, page 4.</p> <p>2 This is an FA1 form. It is a blank FA1 form. If</p> <p>3 you look on page 4, you will see spontaneous incident,</p> <p>4 if we could pull that out, please.</p> <p>5 THE CHAIRMAN: Page 4 or page 2?</p> <p>6 MS KAUFMANN: Do I have the wrong page? I am sorry -- it is</p> <p>7 page 4.</p> <p>8 THE CHAIRMAN: Okay, it is page 4 of the IPC reference, it</p> <p>9 is page 2 of the document.</p> <p>10 MS KAUFMANN: I'm sorry, I am giving the IPC reference, yes.</p> <p>11 THE CHAIRMAN: Don't worry, we have the right page.</p> <p>12 MS KAUFMANN: Spontaneous incidents are defined as:</p> <p>13 "Those incidents which take place without warning,</p> <p>14 the circumstances of which demand that armed support to</p> <p>15 the initial police response must be considered. In</p> <p>16 cases of spontaneous incident or time-critical</p> <p>17 deployment a form FA2 is to be used."</p> <p>18 The FA1 itself makes clear you still have to</p> <p>19 complete a form, do you not, Mr Williams?</p> <p>20 Before you answer that, can we look in fairness to</p> <p>21 you at the MPS's SOP, the SOP. That is IPC79,</p> <p>22 paragraph 5.6.</p> <p>23 I need myself to pull it up, yes, I have it.</p> <p>24 This is the MPS use of firearms and less-lethal</p> <p>25 weapons SOP. At paragraph 5.6:</p> <p style="text-align: center;">Page 177</p>	<p>1 "Spontaneous incidents are those incidents that take</p> <p>2 place without warning ..."</p> <p>3 Then it states there are additional guidance, it is</p> <p>4 defined there, and then at paragraph 5.16:</p> <p>5 "In the event of a spontaneous incident which may</p> <p>6 require the assistance of the SFC, the TFC may brief</p> <p>7 them via the telephone from their log of events form</p> <p>8 FA2. However, the command of the incident rests with</p> <p>9 the initial TFC ..."</p> <p>10 It does make clear, doesn't it, both the SOP and the</p> <p>11 FA1, that you should still be completing forms which are</p> <p>12 themselves specifically framed to make sure that you</p> <p>13 comply with the national decision making model?</p> <p>14 <b>A. Yes -- the FA2 has a section in it, from memory, where</b></p> <p>15 <b>there is an opportunity to complete a spontaneous log of</b></p> <p>16 <b>events, but on the day in question, it simply wasn't</b></p> <p>17 <b>practicable, given the events that were happening, to</b></p> <p>18 <b>submit a form.</b></p> <p>19 <b>I take your point entirely of what is written here</b></p> <p>20 <b>and I have -- I am struggling to actually comprehend the</b></p> <p>21 <b>practicalities of doing an FA2 in circumstances of</b></p> <p>22 <b>13 October, it simply was not practicable.</b></p> <p>23 Q. Can I take you to a few more parts of this SOP, and I am</p> <p>24 then going to ask you some questions about it.</p> <p>25 THE CHAIRMAN: Is this within the two areas.</p> <p style="text-align: center;">Page 178</p>
<p>1 MS KAUFMANN: This is within the two areas, yes. This is on</p> <p>2 double hatting and who should be tactical firearms</p> <p>3 commander.</p> <p>4 THE CHAIRMAN: Fine, thank you.</p> <p>5 MS KAUFMANN: If we can move to 6.6 -- sorry, we looked at</p> <p>6 6.6 this morning. 6.10:</p> <p>7 "In operations involving the deployment of AFOs it</p> <p>8 is essential that objectivity and oversight are clearly</p> <p>9 demonstrated in the decision-making process, separation</p> <p>10 of roles and clarity of responsibility is essential to</p> <p>11 the provision of effective command and tactical advice.</p> <p>12 Where tactical advice is required by a commander, this</p> <p>13 advice should be independent."</p> <p>14 It continues about the tactical adviser:</p> <p>15 "The function of the strategic or tactical firearms</p> <p>16 commander must not be undertaken by the senior</p> <p>17 investigating officer responsible for the investigation</p> <p>18 of offences for which the firearms operation is being</p> <p>19 conducted. It is the responsibility of the SFC to</p> <p>20 satisfy themselves that Article 2 requirements are being</p> <p>21 met."</p> <p>22 Can we then go on to 6.17 and this deal with SCO19,</p> <p>23 the firearms command unit and it explains:</p> <p>24 "The firearms command unit was set up in</p> <p>25 November 2009 following the implementation of</p> <p style="text-align: center;">Page 179</p>	<p>1 recommendations from the Stockwell shooting report.</p> <p>2 SCO19 MPS firearms unit has pan-London responsibility</p> <p>3 for providing specialist command, capability for planned</p> <p>4 firearms operations and support to OCUs in managing</p> <p>5 spontaneous operations. The unit also provides</p> <p>6 corporate oversight of MPS firearms resources and</p> <p>7 supports the tasking of those assets and priorities."</p> <p>8 Can we then move down to 6.21:</p> <p>9 "In 2011 SCO19 took on responsibility for the</p> <p>10 command of all spontaneous firearms incidents within the</p> <p>11 MPS."</p> <p>12 Do you see that paragraph there?</p> <p>13 <b>A. I do see that paragraph, yes.</b></p> <p>14 Q. Did you know about that, Mr Williams?</p> <p>15 <b>A. I can't say specifically whether I knew about it at the</b></p> <p>16 <b>time.</b></p> <p>17 Q. You didn't comply with it, did you?</p> <p>18 <b>A. Well I contacted the on-call ARV TFC and I think the</b></p> <p>19 <b>role that she performed on the night was probably</b></p> <p>20 <b>compliant with that paragraph.</b></p> <p>21 THE CHAIRMAN: What, sorry?</p> <p>22 <b>A. I don't know if you recall, sir, but obviously when</b></p> <p>23 <b>I made the decision that I needed to run this as</b></p> <p>24 <b>a spontaneous firearms operation, I contacted SCO19 --</b></p> <p>25 THE CHAIRMAN: Yes.</p> <p style="text-align: center;">Page 180</p>

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<p>1 <b>A. -- and spoke to the on-call tactical firearms commander</b> 2 <b>there.</b> 3 THE CHAIRMAN: Yes. 4 MS BLACKWELL: I am so sorry to interrupt, this evidence was 5 given in the course of this morning's session. 6 THE CHAIRMAN: Thank you. 7 MS KAUFMANN: Can you now turn to paragraph 6.22: 8 "The SCO19 TFC cadre will take primary 9 responsibility for all firearms calls. However, another 10 SCO TFC may take command of a firearms call in 11 circumstances where they are accredited and 12 operationally competent and a TFC from SCO19 cadre of 13 ARV duty officer are all committed to other deployments. 14 They are accredited and already dealing with 15 a non-firearms incident that develops into a firearms 16 incident. They are accredited and operationally 17 competent and in the best position to deal with the 18 incident in terms of location and knowledge. In all 19 cases where there is no agreement as to which TFC will 20 command the incident, the on-duty SCO19 SFC must be 21 consulted immediately in order to resolve the issue and 22 ensure tactical command is appointed." 23 <b>A. Sorry, go on.</b> 24 Q. Please carry on -- 25 THE CHAIRMAN: You have not asked the question yet.</p> <p style="text-align: center;">Page 181</p>	<p>1 MS KAUFMANN: No, I haven't asked a question but he wanted 2 to comment. 3 <b>A. I wanted to comment, reading that with you as you have</b> 4 <b>gone through it, I think this paragraph refers to</b> 5 <b>firearms incidents which are not covert operations.</b> 6 <b>I am probably not best placed to answer what the exact</b> 7 <b>policy is, whether officers from SCO19 would be better</b> 8 <b>placed to explain that.</b> 9 THE CHAIRMAN: Right. 10 <b>A. My feeling is that these words relate to firearms</b> 11 <b>incidents involving general public that are not covert</b> 12 <b>operations.</b> 13 Q. It doesn't say anything there, does it, that this refers 14 to -- 15 <b>A. It doesn't say that, but that is my opinion --</b> 16 THE CHAIRMAN: That is your understanding? 17 <b>A. That my understanding, sir, yes.</b> 18 MS KAUFMANN: What it demonstrates, doesn't it, these 19 passages, is that a decision was taken after Stockwell 20 to set up SCO19 as the go-to unit for command of armed 21 deployments? 22 <b>A. Yes, obviously -- obviously review was taken</b> 23 <b>post-Stockwell and amendments were made to Met operating</b> 24 <b>practices.</b> 25 Q. Did you ever, because you said this morning that you had</p> <p style="text-align: center;">Page 182</p>
<p>1 been involved during the course of Operation Utara, 2 where you line managed all the investigating officers. 3 Did you ever consider at any point going, or instructing 4 for instance SIO Murray, to go to SCO19 in order to 5 identify an appropriate command structure? 6 <b>A. I mean SCO7 had their own pool of TFCs and SFCs for</b> 7 <b>covert operations. That is how we conducted our covert</b> 8 <b>operations.</b> 9 Q. So within SCO7 -- 10 <b>A. In answer to your question, sorry, no.</b> 11 Q. The answer is no? 12 <b>A. Yes.</b> 13 Q. Within SCO7, were there other tactical firearms 14 commanders -- 15 <b>A. Yes.</b> 16 Q. -- that Inspector Murray could have gone to other than 17 you? 18 <b>A. That's correct, yes.</b> 19 Q. Did he go to any others apart from you in the course of 20 Utara? 21 <b>A. Yes, because I was not always available or present.</b> 22 <b>Ultimately that was a decision for the SFC, for</b> 23 <b>whatever the particular deployment was for them to be</b> 24 <b>satisfied in relation to the command structure.</b> 25 THE CHAIRMAN: Yes.</p> <p style="text-align: center;">Page 183</p>	<p>1 MS KAUFMANN: Can I look at the -- a number of the 2 applications that you were involved in in the course of 3 Operation Ankaa, and I just want to look at those in 4 terms of which hat you were wearing, were you wearing 5 an investigatory hat as line manager to Inspector Murray 6 or were you wearing a tactical firearms commander hat, 7 which was actually the function you were performing, or 8 should have been performing. 9 The first meeting I want to talk to you about is 10 with AC Gallan, and we looked at the email that you 11 prepared for Commander Ball, and that was in preparation 12 of seeking the authorisation of AC Gallan for the 13 deployment of the audio and the tracking device on the 14 Audi? 15 <b>A. That's correct, yes.</b> 16 Q. That is something that was followed up by you attending 17 a meeting with AC Gallan, wasn't it? 18 <b>A. That's correct, yes.</b> 19 Q. That meeting I think took place on the 13th? 20 <b>A. I believe that is correct, yes.</b> 21 Q. At the end of that meeting, I think AC Gallan indicated 22 didn't she, that she would be giving the authority? 23 <b>A. That's correct, yes.</b> 24 Q. Both for the audio and for the tracking device? 25 <b>A. That's correct.</b></p> <p style="text-align: center;">Page 184</p>

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<p>1 Q. Albeit you didn't get the authority for the audio until 2 some time later? 3 The impression of Steve Alexander at that meeting 4 was that you were leading on behalf of SCO7 in making 5 the application. Would that be the correct impression? 6 <b>A. Mr Alexander wasn't present at the meeting with 7 AC Gallan. I'm sorry if I have given that impression.</b> 8 Q. No, you haven't given that impression, he has given that 9 impression in his own notes. 10 <b>A. Was he there? I don't recall that. I may have got that 11 wrong.</b> 12 Q. No. 13 <b>A. My recollection --</b> 14 Q. Whether you recall it or not, his impression was that 15 you were leading the application. 16 Does that accurately describe what you were doing at 17 that meeting, that you were actually bidding to or 18 applying to AC Gallan? 19 <b>A. I was giving a verbal presentation in relation to the 20 form that had been submitted for that authority, yes.</b> 21 Q. That authority was to have installed some technical 22 equipment which was being installed for the purposes of 23 the investigation? 24 <b>A. That's correct, yes.</b> 25 Q. But you were the tactical firearms commander, you were</p> <p style="text-align: center;">Page 185</p>	<p>1 not involved in the investigation. My understanding was 2 you need to be independent? 3 <b>A. Yes, I have to be independent but I also have 4 responsibilities as tactical firearms commander to try 5 and close intelligence gaps.</b> 6 Q. That application wasn't being made for the purposes of 7 closing intelligence gaps. If you didn't have that 8 probe -- 9 <b>A. And developing and coordinating the tactical plan.</b> 10 Q. The probe was necessary to pursue the investigation, it 11 was an aspect of the pursuit of the investigation, 12 wasn't it? 13 Secondary to that, if you can pursue the 14 investigation, then you can benefit as tactical firearms 15 commander from the information that you obtain but the 16 primary purpose of putting that probe in is to pursue 17 the investigation and allow the offence to run? 18 <b>A. It was about allowing us to conduct the operation safely 19 and potentially negate the need to conduct the actual 20 operation on 11 December, because we may have obtained 21 evidence that we could act on to negate the necessity to 22 deploy on 11 December.</b> 23 Q. Similarly, in relation to the CATO applications, we were 24 taken to those earlier on, you made the applications for 25 funding in respect of all the bits and pieces that</p> <p style="text-align: center;">Page 186</p>
<p>1 needed to be put together to effect the operational plan 2 on 11 December -- that plan being to allow the offence 3 to run? 4 <b>A. I would submit that that is not an investigatory role, 5 and obviously earlier today I outlined my role as the 6 DCI of the office that resourcing for operations was one 7 of the key functions of my role as a DCI there. And 8 that is not investigatory, it is in support of the 9 operation.</b> 10 Q. You have spoke incredibly passionately early on, 11 bringing David Lammy into the picture and the pressure 12 that politicians were putting on you, you spoke 13 incredibly passionately about the need to stop this gang 14 doing what it was doing on the streets of Tottenham. 15 Doesn't that demonstrate, Mr Williams, exactly why 16 one needs proper independent command structures in 17 relation to the deployment of firearms operations in 18 support of investigations that are intended to do 19 exactly what it is you said so passionately this morning 20 you wanted to do? 21 <b>A. I accept that there should be proper command structures 22 in place and obviously I was not the SIO in this 23 operation. It is down to the SFC to make that decision 24 that they are happy with the command structure. I do 25 take your point about the passion and I understand where</b></p> <p style="text-align: center;">Page 187</p>	<p>1 <b>you are coming from, does that passion drive you on, 2 drive you on to the point where you unnecessarily take 3 risks to achieve evidence, but that was not the case in 4 this operation, and I don't submit there is any evidence 5 in this operation to support that claim.</b> 6 Q. That brings me to the next matter that I want to address 7 with you. 8 Let's start 10 November meeting, because we know by 9 10 November, that basically the plan was settled, that 10 you were going to let the operation run, things might 11 come between -- 12 THE CHAIRMAN: Ms Kaufmann, are we still on script or is 13 this something that was not anticipated? 14 MS KAUFMANN: No, no, this is. This is exactly -- I am just 15 coming on to the second point which is exactly about the 16 second point I was discussing with Ms Blackwell. 17 MS BLACKWELL: Intervention and interception. 18 THE CHAIRMAN: Thank you. 19 MS KAUFMANN: That is exactly where we are going now. 20 THE CHAIRMAN: Very good. 21 MS KAUFMANN: You are, by 10 November, at the point where 22 you have settled on a plan, if everything else remains 23 the same -- we know the pieces might move, but if things 24 happen as you anticipate they will happen, then the plan 25 is that you will allow this offence to run. From then</p> <p style="text-align: center;">Page 188</p>

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<p>1 on you are going to put all the pieces in place to make 2 sure that you could do that, and we have seen how you 3 did that afterwards. 4 There you are at the 10 November meeting. You have 5 intelligence to the effect that on 29 October there was 6 a failed plan, you believe they already had firearms for 7 that plan and other weapons, from what you have told us? 8 <b>A. That's correct, yes.</b> 9 Q. You believe, given the antecedents and everything that 10 you know about this gang, that they are very likely to 11 have firearms on the day, which they will be using in 12 order to effect an escape plan? 13 <b>A. That's correct, yes.</b> 14 Q. So you know at that point in time, given the plan you 15 have in mind, that in all likelihood you will be 16 requiring AFOs to intercept a vehicle, because you know 17 about the vehicle by that point, you have identified it 18 as the mission vehicle. A vehicle in which individuals 19 will be on their way to commit an offence in which they 20 are going to use arms, as far as you are concerned in 21 all likelihood? 22 <b>A. If all those sequence of events happen, it was likely 23 that -- that that was going to happen.</b> 24 Q. It was likely, and that is what you are anticipating? 25 <b>A. But were they on their way to it? I would take issue</b></p> <p style="text-align: center;">Page 189</p>	<p>1 <b>with that, because it was always our intention that we 2 would keep the van and the Audi separate.</b> 3 Q. But you wouldn't know, would you, how prepared they 4 would be? What you would know is that they had come 5 prepared to use weapons. I think you have described it 6 as a highly audacious dangerous enterprise elsewhere, or 7 certainly the MPS has on your behalf. That is exactly 8 what it was you were looking at on 10 November, wasn't 9 it, a highly audacious, potentially very dangerous 10 enterprise? 11 <b>A. That's correct, yes.</b> 12 Q. Yes, into which armed firearms officers were necessarily 13 going to be put in order to prevent it from actually 14 happening? 15 <b>A. That's correct, yes.</b> 16 Q. Yes. 17 It was quite possible, was it not, that what you 18 might be dealing with at that stage, was not a routine 19 interception as you have called it, and described it, 20 but actually something much more akin to 21 an intervention? 22 <b>A. No, absolutely not. It is very different to 23 an intervention.</b> 24 Q. On what basis is it different to an intervention? 25 <b>A. An intervention is where officers take action during the</b></p> <p style="text-align: center;">Page 190</p>
<p>1 <b>commission of an offence. An interception is where 2 officers take action prior to that commission of the 3 offence, or immediately after the commission of the 4 offence.</b> 5 Q. Isn't it all rather relative in a situation like this, 6 where your interception is one that is necessarily going 7 to take place in the course of individuals getting 8 themselves ready to commit an offence? 9 <b>A. Well, again, potentially we are in danger of running 10 into the events of 11 December, as to what their state 11 was when I gave the instruction to move forward. So 12 I am just treading a little bit carefully in relation to 13 that.</b> 14 Q. We are very far away from 11 December, because I am 15 talking to you now as you were on 10 November, when you 16 could sit and think about and plan, because that is the 17 whole point of your meeting, wasn't it, plan what the 18 end point is likely to look like, to carry out that 19 360-degree review of the risks. One of those potential 20 risks was that an interception would take place at 21 a time when these individuals were in a state of some 22 preparedness to use those firearms? 23 <b>A. That was a likelihood.</b> 24 Q. Yes. 25 <b>A. That was a likelihood.</b></p> <p style="text-align: center;">Page 191</p>	<p>1 Q. That was a likelihood? 2 <b>A. Yes.</b> 3 Q. And what we see -- 4 <b>A. But -- sorry, but obviously I don't necessarily go 5 everything we have spoken about before, but the actual 6 precise moment of when those tipping points come, I had 7 no idea when, where that would come and the precise 8 manner in which they would come, which obviously would 9 determine my tactics at the time.</b> 10 Q. Yes, but this risk, the nature of this risk, shouldn't 11 have just determined your tactics at the time, it should 12 have determined whether you went ahead with the 13 operation at all. It was something to factor in at two 14 stages, wasn't it? 15 Firstly, do we go ahead in the first place or do we 16 tell the prison to make him a cat A prisoner and then he 17 is not going to get out and the only person we haven't 18 got is Ozcan. That was one basis upon which that 19 information was central. 20 The second is if you do go ahead, you have to 21 properly identify the nature of the risk and then you 22 have to mitigate it. But if you have not identified it, 23 you cannot do either of those things, can you? 24 <b>A. I think we had identified the risk and that -- with the 25 threat of the activities of the conspirators, not being</b></p> <p style="text-align: center;">Page 192</p>



<p>1     <b>able to carry out with the van on the other side of</b>  2     <b>London or a suitable distance away, that the actual</b>  3     <b>threat levels at that stage remained low.</b>  4     Q. It is right, isn't it, that there is no record of that  5     analysis of the risk and taking into account --  6     THE CHAIRMAN: You are covering ground that has already been  7     well established.  8     MS KAUFMANN: Well, in one further document. There is  9     nothing in any records relating to meetings, there is  10    nothing two days later when you wrote to Commander Ball  11    and we have seen that there is nothing whatsoever in the  12    FA2. So nowhere ever have you recorded your  13    consideration of that risk, have you?  14    <b>A. I think the FA forms and my operational log on the day</b>  15    <b>adequately do demonstrate my consideration of the risk</b>  16    <b>of running this operation and the benefits and</b>  17    <b>feasibility of success compared to the risks of running</b>  18    <b>it.</b>  19    THE CHAIRMAN: I have the point. Thank you.  20    MS KAUFMANN: Thank you, no further questions.  21    MS BLACKWELL: Sir, I know that we haven't covered today the  22    tactical advice provided by S48 and there is a reason  23    for that. S48 has not yet given evidence and also in  24    terms of the consideration given by this officer  25    together with that officer of any risks that arise and</p> <p style="text-align: center;">Page 193</p>	<p>1     are documented in the FA5 documents, we will come to  2     that when S48 gives evidence.  3     So when Mr Williams returns, and we deal with  4     matters relating to the 11 December, we will also at  5     that point give him the opportunity of looking at the  6     FA5 documents and identifying if he wishes to do so  7     where any of the risks or threats were covered in that  8     document. It wasn't his, but in fairness to him it is  9     something which --  10    THE CHAIRMAN: It's a perfectly proper point.  11    MS BLACKWELL: -- he may well have considered.  12    THE CHAIRMAN: Are there any other questions, Mr Butt?  13    MR BUTT: Sir, I would apply to you to be allowed to ask  14    brief questions on those two topics on the question of  15    double hatting and on the question of intervention  16    versus interception.  17    THE CHAIRMAN: How can they assist me? I know what the  18    issues are.  19    MR BUTT: Because it has been put to the witness this was  20    more akin to an intervention.  21    THE CHAIRMAN: And he says it wasn't.  22    MR BUTT: I would like to take him to the documents dealing  23    with that in order to explain the point.  24    THE CHAIRMAN: I am not going to stop you.  25    MR BUTT: It has been put to him that he spoke with passion</p> <p style="text-align: center;">Page 194</p>
<p>1     about the need to take action in this case. I would  2     like to look at the documents dealing with sustained  3     public protection, which explains why that is relevant  4     for those in the firearms command structure and not just  5     the senior investigating officer.  6     THE CHAIRMAN: Well I am not sure whether that will help  7     you, because that is precisely the point that we are  8     talking about which is the danger of overlap.  9     MR BUTT: But this is APP, this is the guidance that is  10    given to --  11    THE CHAIRMAN: If you keep it within bounds.  12    MR BUTT: It will be within bounds and very short.  13    THE CHAIRMAN: The other matter I want to consider carefully  14    dealing with today is that when we were first dealing,  15    Ms Blackwell, with the grading of the intelligence.  16    MS BLACKWELL: Yes.  17    THE CHAIRMAN: Mr Williams said that rather cryptically, but  18    perhaps understandably, that it was difficult in the  19    present form.  20    MS BLACKWELL: Yes.  21    THE CHAIRMAN: I wondered whether if we had to deal with  22    that in a closed session, we could usefully do that  23    today so that we knew where we stood before he returned?  24    MS BLACKWELL: We are giving some thought to that. It may  25    not be possible to deal with that today, but whilst my</p> <p style="text-align: center;">Page 195</p>	<p>1     learned friend is asking his questions, in the short  2     time that is allowed, I will endeavour to get some  3     answers for you.  4     THE CHAIRMAN: Thank you very much.  5     Yes, Mr Butt.  6     Questions from MR BUTT  7     MR BUTT: It was suggested to you that you were in effect  8     double hatting in this operation.  9     <b>A. Yes.</b>  10    Q. First of all, do you accept that?  11    <b>A. No, I don't.</b>  12    Q. The concern about double hatting, as you explained  13    earlier, is that a concern that an investigator or  14    an SIO might put evidence gathering over the safety of  15    subjects in an armed operation.  16    <b>A. No, that did not occur.</b>  17    Q. Were you an SIO on Operation Utara?  18    <b>A. I wasn't, no.</b>  19    Q. Were you an SIO on any operation at all at that time?  20    <b>A. No.</b>  21    Q. You were asked about what you said, and it was put to  22    you that you said with some passion about protecting the  23    people of London. Do you stand by what you said with  24    some passion?  25    <b>A. Absolutely.</b></p> <p style="text-align: center;">Page 196</p>

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<p>1 Q. When you were speaking in that way, were you referring 2 to the principle of sustained public protection? 3 <b>A. Yes, I was.</b> 4 Q. Is that a consideration not for SIOs but for strategic 5 firearms commanders and tactical firearms commanders? 6 <b>A. That's correct, yes.</b> 7 Q. Can we look, please at COP0000024, page 10. 8 Is this the approved professional practice armed 9 policing content that was in force in 2015? 10 <b>A. I believe so, yes.</b> 11 Q. Do we see on this page, and then going on to the next 12 page, guidance from the College of Policing in relation 13 to the principle of sustained public protection as it 14 applies in firearms operations? 15 <b>A. Yes, as far as -- yes.</b> 16 Q. Does this document set out the need for firearms 17 commanders to consider both short-term risk and the 18 longer term risk if it is not possible to obtain 19 evidence in order to arrest and prosecute determined 20 recidivist offenders? 21 <b>A. It does, yes.</b> 22 Q. Does it stress the need for commanders to consider the 23 risk to the public if that evidence is not obtained and 24 offences are committed in the future? 25 <b>A. It does, yes.</b></p> <p style="text-align: center;">Page 197</p>	<p>1 Q. Were you obliged to take this into consideration? 2 <b>A. Absolutely, it was key to the decision making</b> 3 <b>throughout.</b> 4 Q. Would you say that the Erens and the higher echelon of 5 the Tottenham Turks meet this description of dangerous 6 recidivist offenders? 7 <b>A. That's my assessment, but I think an interesting</b> 8 <b>document really to support that really were the</b> 9 <b>sentencing comments -- I think it was --</b> 10 THE CHAIRMAN: I think we have the picture. Nobody is 11 taking that -- I am not going to start reading judge's 12 sentencing comments. 13 MR BUTT: Of course. It was put to you that what happened 14 on 11 December was more akin to an intervention than 15 an interception. 16 Are you familiar with the difference between 17 an intervention and an interception? 18 <b>A. Yes, I am.</b> 19 Q. In relation to an intervention, I am not going to ask 20 that it be brought up but the definition is, for 21 example, at COP4, page 6. Is that an arrest during the 22 commission of an offence? 23 <b>A. It is, yes.</b> 24 Q. Is that an arrest where the victim is present? 25 <b>A. That's correct, yes.</b></p> <p style="text-align: center;">Page 198</p>
<p>1 Q. Is the definition of an intervention the police 2 intervening there and then to stand between the victim 3 and the perpetrator? 4 <b>A. That's correct, yes.</b> 5 Q. In this case, who would the potential victim have been? 6 <b>A. Hmm, the criminal justice system?</b> 7 Q. What about the Serco van and the driver? 8 THE CHAIRMAN: No, this was an offence of conspiracy to 9 escape. The public is the victim. 10 MR BUTT: What about the Serco van and the driver of that 11 van, and the guards on that van? 12 <b>A. Potentially they would have been victims.</b> 13 Q. How far away was the van from the Audi at the time of 14 the interception? 15 <b>A. My last recollection of it, it was in the vicinity of</b> 16 <b>Neasden on the A406.</b> 17 Q. Was there any risk that that van was going to come into 18 contact with that Audi that morning? 19 <b>A. Not in my mind.</b> 20 Q. Did the FA5 contain tactical advice in relation to 21 an intervention? 22 <b>A. No.</b> 23 Q. Did it advise an intervention would not be advisable in 24 this case? 25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 199</p>	<p>1 Q. Would you have allowed for an intervention where 2 officers had to step in with that van being present in 3 the vicinity of the Audi? 4 <b>A. Absolutely not.</b> 5 Q. And why not? 6 <b>A. Because of the risks.</b> 7 MR BUTT: Thank you very much. 8 Those are my questions. 9 THE CHAIRMAN: Very good. 10 Yes. 11 MS BLACKWELL: I have nothing further to ask and I see that 12 you have asked your questions, sir. 13 THE CHAIRMAN: Yes. Are we going to make any further 14 progress today in relation to that outstanding matter or 15 not? 16 MS BLACKWELL: I don't think so. I am conscious that 17 Mr Sheldon is not present -- 18 THE CHAIRMAN: Right. 19 MS BLACKWELL: -- and we would need to speak to him at some 20 point. 21 THE CHAIRMAN: Yes, very good. Okay. 22 MS BLACKWELL: We will endeavour to determine it without 23 having to go into closed session if we can. 24 THE CHAIRMAN: Very good. Thank you very much. 25 MS BLACKWELL: Sir, having said that, may we now invite you</p> <p style="text-align: center;">Page 200</p>

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1 to rise until 10.00 on Monday morning?  
 2 THE CHAIRMAN: You may.  
 3 MS BLACKWELL: Thank you.  
 4 THE CHAIRMAN: Thank you all for your combined efforts to  
 5 ensure that we, despite the threats at the beginning of  
 6 the week, have managed to keep on track, it is a tribute  
 7 to everybody.  
 8 MR BUTT: Ms McNeill says I will speak to Mr Williams and we  
 9 assume you would have no objection to that.  
 10 THE CHAIRMAN: I think I have already indicated that I don't  
 11 require a formal application. You can make a formal  
 12 application to Ms McNeill.  
 13 MR BUTT: I don't know why the thought occurred to me, sir.  
 14 THE CHAIRMAN: If she grants it, that is fine.  
 15 Thank you very much.  
 16 (4.18 pm)  
 17 (The Inquiry adjourned until 10.00 am on Monday,  
 18 28 June 2021)  
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