

- IPCC report, paragraph 1073 – the bag was removed from Jermaine Baker and placed away from his body by R116.
- W80 (statement dated 17th August 2016) cannot be precise about the position of the bag but believed it was higher in the chest area.

3. Purpose

To provide further opinion in relation to the bag that Jermaine Baker was wearing at the time of the incident. Review and, where applicable, provide a general response to the report of Mr Brooks, including his comments at pages 6, 8 and 9. In particular, to respond to the following questions:

- (i) Is the damage on the upper or lower edge of the strap when over the shoulder?
- (ii) Is the damage on the fixed or extendable part of the strap?
- (iii) If the bag were worn high on the chest with the strap on the shortest setting, where would the damage have been?
- (iv) Is the damage to the strap consistent with a gunshot or an attempted cut by scissors?
- (v) An explanation as to why no images of the position of the bag with the mannequin in the sitting position have been provided.

Please conduct a repeat of the exercise you carried out for the IPCC but with the mannequin in a seated position and prepare a report on your findings and conclusions.

Comments and Conclusion

(i) Is the damage on the upper or lower edge of the strap when over the shoulder?
Whilst being worn over the right shoulder, the bag can be worn with the face, i.e. the surface with the Nike logo, towards or away from the wearer's body. The orientation of the bag and the strap would determine whether the damage is on the upper or lower edge. In my opinion it is not possible to say if the damage was on the upper or lower edge of the strap at the time it was caused.

(ii) Is the damage on the fixed or extendable part of the strap?
From the photographs taken during the laboratory examination, the damage appeared to be on the extendable section of the strap.

(iii) If the bag were worn high on the chest with the strap on the shortest setting, where would the damage have been?

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Without putting the strap on the shortest setting, it is not possible to say where the damage would have been in relation to the injury sustained by Jermaine Baker, or indeed whether it could have been worn over the shoulder. There is nothing in the witness statements to suggest that the strap of the bag had been adjusted.

(iv) Is the damage to the strap consistent with a gunshot or an attempted cut by scissors?

During my examination of the bag and as detailed in my statement of 21st July 2016, the damage observed was not examined in detail. However, I note that in the statement of Khaldoun Kabbani, dated 30th April 2016, he stated that the straps of this bag were found to have sustained bullet damage. The damage on the strap corresponded to the damage observed to the neck area on Jermaine Baker's sweatshirt (AJW/17) and T-shirt (AJW/16) and, as per Khaldoun Kabbani's statement, the damage is in-keeping with the position of the entry damage to the upper front zip and surrounding fabric of the sweatshirt AJW/17, and with the neck entry wound.

(v) An explanation as to why no images of the position of the bag with the mannequin in the sitting position have been provided.

The work previously undertaken and detailed in my report of 19th April 2016, was to show the approximate positioning of the man bag when worn during the incident, i.e. over which shoulder was the bag most likely worn. At the time of my examination, an area of damage was noted to the strap. The damage was considered by me to have possibly been made by a bullet and, therefore, using this as a reference point in relation to the injury to the neck sustained by Jermaine Baker, the bag was positioned on the mannequin. At this stage, the assumption was made that the bag was worn as intended with the 'Nike' logo face of the bag facing away from the torso. As such, it was my opinion that the bag had been worn over the right shoulder.

On the 26th May 2021, I attended the Peel Centre, London. Together with Dr Charlotte Randall (Forensic Pathologist), Mr Khaldoun Kabbani (Forensic Firearms Expert) and Dr Adam Brooks (Consultant Surgeon), I participated in a scene reconstruction relating to the incident on the 11th December 2015. Part of the reconstruction involved placing the bag in multiple positions and orientations on an individual of similar build and height to Jermaine Baker whilst he was sat in a motor vehicle. Details of the reconstruction and further

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