

<p>1 Tuesday, 6 July 2021 2 (10.00 am) 3 THE CHAIRMAN: Good morning, everybody. 4 FE19 (sworn) 5 A. Good morning. 6 THE CHAIRMAN: Good morning. 7 Questions from MS BLACKWELL 8 MS BLACKWELL: Thank you, sir. 9 Are you known by the cipher FE19? 10 A. That's correct, yes. 11 Q. Are you a detective sergeant in the Metropolitan Police? 12 A. I am, yes. 13 Q. I am going to ask you some questions on the following 14 topics: first of all, your experience and training 15 within the Metropolitan Police; your role in Operation 16 Ankaa, taking in that which can be described as acting 17 as an intelligence officer; your involvement in the 18 Covert Monitoring Post on 11 December; and also we will 19 touch upon the work that you performed in relation to 20 surveillance on Ozcan Eren. 21 A. Yes. 22 Q. All right. 23 First of all, could I ask you please to summarise 24 your experience and training in the Metropolitan Police 25 as at 11 December 2015.</p> <p style="text-align: center;">Page 1</p>	<p>1 A. I have been a police officer for almost 18 years, over 2 18 years. Most of that was spent in proactive policing. 3 Drug squads, crime squads, I served on the murder 4 command in a proactive unit, I served in Operation 5 Trident, in both a reactive investigative role and in 6 a proactive role. I was surveillance trained in early 7 2004, I believe, and since then I have carried out 8 surveillance on serious and organised crime and 9 proactive investigations, utilising surveillance for 10 most of that time. With the exception of when I was 11 involved in reactive Operation Trident enquiries, and 12 even then there was some proactivity involved. 13 Q. Thank you. 14 Were you involved in Operation Utara? 15 A. I was, yes. 16 Q. In what capacity? 17 A. I joined the central task force in 2015, I believe 18 around May time. Operation Utara was already 19 a long-established drugs investigation into Turkish 20 organised crime and I became the detective sergeant on 21 that team. There should be two detective sergeants on 22 the team, on that there was only one, being myself, and 23 I oversaw that operation and other serious and organised 24 crime investigations that were run by that team. 25 Q. Why do you say there should have been two detective</p> <p style="text-align: center;">Page 2</p>
<p>1 sergeants? 2 A. Because there should, that is the make up of the team. 3 THE CHAIRMAN: Why was there only one? 4 A. Because there was a lack of a detective inspector and 5 one of the detective sergeants was acting detective 6 inspector to cover that team. 7 In reality on that team, where I was the only 8 detective sergeant, the amount of people I was 9 supervising is only slightly in excess of what 10 I supervise now. 11 MS BLACKWELL: So is it your evidence that, despite the fact 12 that there was a missing detective sergeant position, 13 that you were able to deal with the workload that fell 14 to you? 15 A. Yes. 16 Q. Right. 17 When did you become aware of the birth of Operation 18 Ankaa and the circumstances in which that operation came 19 to be formulated? 20 A. It was late on in October, I came back from a period of 21 leave, and I was made aware that intelligence had been 22 received in relation to the planned breakout and that 23 an operation had been begun in order to deal and manage 24 with that threat. 25 Q. Yes.</p> <p style="text-align: center;">Page 3</p>	<p>1 Were you involved in the planning of Operation 2 Ankaa? 3 A. Yes, as the DS on the team. The SIO would oversee the 4 investigation and he would set the basic strategy of how 5 we would do it and the aims and objectives. My job was 6 to achieve those aims. He set the aims and objectives, 7 I had the detectives that worked alongside me and 8 between us we worked together in trying to achieve those 9 aims. 10 So we would manage the operation between us. 11 Q. Did that bring you to become involved in the 12 surveillance of Ozcan Eren? 13 A. Yes. I was -- in effect I am the surveillance team 14 leader for that team. 15 Q. Right. 16 A. So when we go out on surveillance, it would be my 17 responsibility to decide whether we have got sufficient 18 resources to go out, when we were going to go out, and 19 for how long we were going to go out, and during the 20 course of that surveillance make any calls as to whether 21 or not to suspend the surveillance or who to focus the 22 surveillance on should the situation change. 23 Q. Right. Are you able to assist the inquiry with when 24 Ozcan Eren was last under surveillance prior to 25 11 December?</p> <p style="text-align: center;">Page 4</p>

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<p>1 A. I think it was 7 December.</p> <p>2 Q. Right, were you involved in that deployment?</p> <p>3 A. I can't remember.</p> <p>4 Q. All right, we can check the records in any event.</p> <p>5 Let's deal then with your involvement in the</p> <p>6 planning of Operation Ankaa and the disseminating of</p> <p>7 relevant information and intelligence, please.</p> <p>8 What was your involvement in the run-up to</p> <p>9 11 December in intelligence dissemination?</p> <p>10 A. The intelligence was mainly dealt with by DCs Kinch and</p> <p>11 Sparks.</p> <p>12 Q. Right.</p> <p>13 A. The reason for that was that they had dealt with the</p> <p>14 initial intelligence on my return, so for some sort of</p> <p>15 continuity I left them to take it.</p> <p>16 On occasions during the operation of Utara there</p> <p>17 were other firearms deployments, which I then took</p> <p>18 intelligence in relation to. They would update me with</p> <p>19 any relevant intelligence.</p> <p>20 Q. Yes.</p> <p>21 A. I would ask if that intelligence has been passed to the</p> <p>22 SIO or TFC, if not then I would ensure that it was and</p> <p>23 if I wasn't available then they would update me, and</p> <p>24 I would periodically ask had there been any updates in</p> <p>25 relation to it also.</p> <p style="text-align: center;">Page 5</p>	<p>1 Q. You have mentioned there dissemination to both the SIO</p> <p>2 and the TFC.</p> <p>3 Was it your preference to update either one or the</p> <p>4 other or both and how did you decide the most</p> <p>5 appropriate person to update?</p> <p>6 A. Ultimately the SIO needs to be updated, because he is</p> <p>7 the person in overall charge of it but I would hazard</p> <p>8 a guess that I would say it is probably equally</p> <p>9 important to update both, because although the SIO runs</p> <p>10 the investigation, once it was declared to be a firearms</p> <p>11 operation we cannot really make any decisions without</p> <p>12 the agreement or consulting the TFC, because they</p> <p>13 controlled the operation from that side, with a view to</p> <p>14 keeping the balance.</p> <p>15 Q. What was your day-to-day level of involvement with</p> <p>16 Mr Murray and Mr Williams?</p> <p>17 A. It would vary. At the time we were obviously running</p> <p>18 Operation Ankaa, but we were also still running</p> <p>19 Operation Utara.</p> <p>20 Q. Yes.</p> <p>21 A. There was other drugs investigations that the other side</p> <p>22 of my team were conducting, as well as the two other</p> <p>23 syndicates that were based on the central task force,</p> <p>24 where we would chip in and help with surveillance.</p> <p>25 So if there was anything to update them with, we</p> <p style="text-align: center;">Page 6</p>
<p>1 would update them. There were occasional meetings,</p> <p>2 I can't remember when they were. And things would be</p> <p>3 discussed. But whenever there was a development, it</p> <p>4 would be updated, as -- if an action had been given to</p> <p>5 establish something, such as obtaining authority, then</p> <p>6 updates would be done through that. Especially as a lot</p> <p>7 of the authorities require the SIO's sign off.</p> <p>8 Q. Did you have any involvement in the completion of any of</p> <p>9 the firearms authorisation forms?</p> <p>10 A. I don't recall. I believe the only one that was written</p> <p>11 was an FA2, which is a TFC's form which I wouldn't have</p> <p>12 any idea how to fill out.</p> <p>13 Q. Did you ever have sight of that form?</p> <p>14 A. I don't believe so, I don't see why I would.</p> <p>15 Q. Were you aware that an FA1 form was not completed?</p> <p>16 A. I am now.</p> <p>17 Q. Right.</p> <p>18 A. I was not aware -- I mean I would have been aware at the</p> <p>19 time, because I would have probably taken it upon myself</p> <p>20 to either fill it out or check it, so I probably was</p> <p>21 aware at the time but I can't remember now.</p> <p>22 Q. You would have taken it upon yourself to fill the FA1</p> <p>23 form out?</p> <p>24 A. Or get it filled out.</p> <p>25 Q. Right. So was it your responsibility to perform that</p> <p style="text-align: center;">Page 7</p>	<p>1 role in relation to that form?</p> <p>2 A. Not necessarily. The FA1 form that we currently use in</p> <p>3 the Met Police is quite a complicated form now and it</p> <p>4 encompasses quite a lot of the information I think that</p> <p>5 would ordinarily go on an FA2.</p> <p>6 Q. Right.</p> <p>7 A. The FA1 form at that time, there was not an awful lot in</p> <p>8 it. It effectively says what is the problem and what</p> <p>9 would you like to do about it.</p> <p>10 Q. Right.</p> <p>11 A. So it is not a complicated form, such as if the</p> <p>12 information was FE19 was intent on robbing a bank or</p> <p>13 stealing a car, that has a gun in it, it would be, "This</p> <p>14 is what the intelligence is and we want to deal with</p> <p>15 this".</p> <p>16 Because the person who fills it out doesn't have any</p> <p>17 firearms training, be it as a firearms officer -- well,</p> <p>18 they may well do, but invariably they are not firearms</p> <p>19 officers, they are not TFCs, so a lot of the information</p> <p>20 that would go in it wouldn't be for them to write.</p> <p>21 Q. Did it surprise you in this operation that there was no</p> <p>22 FA1 form completed?</p> <p>23 A. No.</p> <p>24 Q. Why not?</p> <p>25 A. Because it is -- first of all, I don't recall whether or</p> <p style="text-align: center;">Page 8</p>

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<p>1 not I was aware that one hadn't been. I would expect to 2 have been aware but I don't recall. It wouldn't 3 surprise me, because if an -- the firearms operations 4 was being run and the TFC, in my opinion, is 5 an extremely experienced TFC, who I have worked with 6 previously, and if the decision had been made that only 7 an FA2 was sufficient, then I was happy to go with that, 8 because they are far more qualified to make that 9 decision than I am.</p> <p>10 Q. Have you been involved in other operations where there 11 is an absence of an FA1 form?</p> <p>12 A. Yes. They are spontaneous operations, so whereas we 13 will get fast-time intelligence to deal with an issue, 14 we will deploy to deal with it, we will call for 15 firearms support, there is no time to fill that form 16 out.</p> <p>17 Q. Yes.</p> <p>18 A. That is when there has never been an FA -- but in terms 19 of a pre-planned one, I don't recall one, no.</p> <p>20 Q. So this is the only pre-planned operation in which you 21 have been involved where there has not been an FA1 form 22 completed?</p> <p>23 A. I think so, yes.</p> <p>24 THE CHAIRMAN: What do you see as the purpose of that 25 document?</p> <p style="text-align: center;">Page 9</p>	<p>1 A. The FA1 form is to set out what the problem is. So if 2 I receive some information and I decide this has got 3 a firearms element to it and I think I need firearms 4 support. So I would then fill that form out, send it to 5 a TFC to say, "I think we need firearms on this", the 6 TFC would then assess it and decide, yes, you do need 7 firearms support on it and deal with whatever --</p> <p>8 THE CHAIRMAN: Is it the case that it didn't come into 9 existence in Operation Ankaa because the person who took 10 the view that it ought to be a firearms operation was 11 the TFC himself?</p> <p>12 A. It could be, but I would be answering on the TFC's 13 behalf.</p> <p>14 THE CHAIRMAN: We are looking for a reason why there wasn't 15 one, you see.</p> <p>16 A. That would make sense, but I think the question would be 17 better put to the TFC for clarity.</p> <p>18 THE CHAIRMAN: Thank you.</p> <p>19 MS BLACKWELL: I would like to move on to ask you some 20 questions about your attendance at the briefing at 21 New Scotland Yard on 10 November.</p> <p>22 A. Yes, ma'am.</p> <p>23 Q. In what capacity did you attend that briefing?</p> <p>24 A. I attended it as effectively the DS on the team that was 25 running the operation. So it was an operation that</p> <p style="text-align: center;">Page 10</p>
<p>1 I was involved in, it was an operation that I was the DS 2 on the team running it --</p> <p>3 Q. Yes.</p> <p>4 A. -- so it made sense that I was there to be present at 5 that briefing. It was -- it is a little bit different 6 to an ordinary briefing, so if we were doing a drugs 7 warrant or something similar like that, then I would be 8 there making sure everybody who I wanted there was 9 there. But because this was a firearms briefing and 10 because it was a multifaceted operation with a variety 11 of people in it, the decisions of who was there and who 12 was not there were not for me. So I didn't really have 13 a role within it other than to be present at the 14 briefing.</p> <p>15 Q. Right.</p> <p>16 Who decided on the invitations, who decided who 17 should be present?</p> <p>18 A. I think it was discussed between all of the controlling 19 parties, so that would have been the SIO for SCD7, the 20 TFC, the management of ... who are MO19 and the 21 management, who were I think at the time SCO35 -- the 22 surveillance command. So the decision would have been 23 made around them. I do remember that not everyone who 24 was going to be involved in the operation was present.</p> <p>25 From memory, I think that is simply because it would</p> <p style="text-align: center;">Page 11</p>	<p>1 have withdrawn so many resources from the Met Police for 2 that day, that is why not everybody was there. From 3 recollection, I believe that is why but ultimately those 4 decisions were made by the commanding officers for the 5 various commands.</p> <p>6 Q. You have mentioned in that answer that the people who 7 decided on the attendees, or who to invite to the 8 briefing, were a series of officers in command and 9 control. How do you know that?</p> <p>10 A. Because that is who would have made those decisions.</p> <p>11 Q. Do you know that that is who made the decisions or are 12 you surmising, given your experience, that that is what 13 would have happened?</p> <p>14 A. In experience, I am speculating that that would be the 15 answer as to who was there.</p> <p>16 Invariably, I would guess that everyone who was 17 going to be involved in the operation probably would be 18 invited to attend the briefing. That would make sense, 19 but sometimes the logistics of that, if there are other 20 operations and draws on resources, they are not 21 necessarily able to attend.</p> <p>22 Q. Could we have a look, please, Mr Coates, at MPS2723.</p> <p>23 This is an email chain involving the setting up of 24 the meeting. Could we go to page 3, please.</p> <p>25 This is an email to Gary Kinch.</p> <p style="text-align: center;">Page 12</p>

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<p>1 THE CHAIRMAN: For the record, I think Ms Blackwell you said 2 that the briefing was 10 November, it was of course 3 10 December. 4 MS BLACKWELL: December of course, I am so sorry. 5 THE CHAIRMAN: That is all right. 6 MS BLACKWELL: From Alison Goddard-King, who is described at 7 the bottom as DS surveillance operation centre. 8 Did you know Ms Goddard-King? 9 A. No. 10 Q. Do you have experience of the surveillance operation 11 centre? 12 A. Yes. 13 Q. What is it and what happens there, please? 14 A. Without being disrespectful to them, it is a booking 15 office. So if I require a surveillance team, I will 16 phone up that office, or now you submit an application, 17 and say can we have a surveillance team? They will ask 18 you when you want them, they will discuss the operation 19 with you and then ultimately they will decide whether or 20 not they have any spare. There is a grading system, so 21 if there are three teams that want a surveillance team 22 and there is only one available, they will look at which 23 operation and decide which one is the more serious that 24 requires the resources. 25 Then, I believe -- I have never worked on the</p> <p style="text-align: center;">Page 13</p>	<p>1 surveillance command, I believe they then liaise with 2 the teams and tell them where they are supposed to be on 3 whichever days and who their briefing officer will be 4 and who to contact and whether the operation is armed or 5 unarmed. 6 Q. Right, okay, thank you for that. 7 Let's see what Ms Goddard-King is doing in her 8 capacity as organiser: 9 "Hi Gary, just tried to call you to discuss as Ryan 10 is off today and I just wanted to talk about the plans 11 for later this week. Some things need a discussion such 12 as the current directed surveillance authorities for the 13 drug trafficking offences being committed by that OCN 14 and another would be needed for the specific 15 intelligence including a suitable risk assessment. Can 16 we also have a copy of the firearms authority, please. 17 "Secondly, the on-call DI for this week is 18 DI Chris Davies. Would be keen to have all teams 19 briefed together for the job on the day, even if this 20 does mean bringing the teams on earlier, he is also keen 21 to have an intel update from you. If the team is 22 briefed together on the morning of the job then this 23 might negate a pre-brief the day before and the further 24 abstractions from surveillance deployments. I am going 25 to need all of these things covered off urgently so that</p> <p style="text-align: center;">Page 14</p>
<p>1 we can sort the week's work out. If you wouldn't mind 2 giving me or DI Davies a call, please." 3 If we scroll up -- we can see that was sent on 4 7 December. I think if we can go up further, please, 5 then Gary Kinch responds later that day: 6 "Spoke with the DI today. Can I assume this is all 7 sorted now?" 8 Can we scroll up, please to the next email. Thank 9 you: 10 "Just spoken to Alison, and she was of the mind that 11 the criminality under Ankaa is different to the 12 criminality under Utara, therefore needs a new DSA 13 et cetera to cover that. I have said it is covered by 14 associated firearms offences as per the wording of 15 authority. She is going to run it by Chris Davies but 16 she was backing down having read the authority. I will 17 let you know if there is any development, but I think it 18 is sorted." 19 That was to you? 20 A. Yes. 21 Q. Do you remember receiving that email? 22 A. No. 23 Q. All right. Can you explain to us what the discrepancy 24 appeared to be in terms of the associated firearms 25 offences and the authority?</p> <p style="text-align: center;">Page 15</p>	<p>1 A. One of the other things that the surveillance operation 2 command will do is ensure that their resources are being 3 deployed lawfully, so that there is a lawfully present 4 directed surveillance authority in place. 5 So the DS here has clearly had a look at it and she 6 has seen that the offences we are investigating are 7 firearms offences on this operation and whereas when she 8 has initially read the directed surveillance authority 9 it mentions drugs. So she has queried whether the 10 authority is valid, and that is just her covering to 11 make sure that the authority is in place. 12 Q. Were you content and satisfied that it was the correct 13 authority? 14 A. Yes, I was. 15 Q. All right. 16 Is there another email or is that the -- yes, pause 17 there, please. 18 Then you respond to Gary Kinch, copying in 19 Rob Murray and DCI Williams: 20 "No problem, although this is a large scale 21 operation. It is in affect a MAST. We have run 22 numerous MASTS on this job. None of which have been 23 subject to separate risk assessments. It's been 24 assessed as an armed job, except one part of it. An FA1 25 has been submitted, assessed and authorised. This have</p> <p style="text-align: center;">Page 16</p>

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<p>1 been put forward to TAC advice (which is a risk 2 assessment in all but name I would say)." 3 A. Yes. 4 Q. Were you there suggesting, FE19, that an FA1 form had 5 been submitted, assessed and authorised for Operation 6 Ankaa? 7 A. In that email, that would appear that is what -- I was 8 of the opinion -- I knew the firearms operation had been 9 authorised, so I assumed an FA1 had been sent in, which 10 is why I would have written that in there. 11 THE CHAIRMAN: What do you think would have happened if you 12 had said, "There is not an FA1 in this case"? 13 A. I would have worded it to say, "Although there is no 14 ..." 15 THE CHAIRMAN: I know that, but what do you think would have 16 happened? Do you think there would have been -- would 17 somebody have said there should be one? 18 A. She may well have come back to me to say, "We think 19 there should be an FA1". At which point I would have 20 said I think this is something you need to liaise with 21 the TFC over, because it is not something I am to be 22 involved in. 23 THE CHAIRMAN: Yes. 24 MS BLACKWELL: Do you think it was as a result of the 25 initial email that we have just looked at from</p> <p style="text-align: center;">Page 17</p>	<p>1 Ms Goddard-King that the briefing on 10 December was 2 organised? 3 A. I don't believe it was as a result of this email that it 4 was authorised. It looks to me like arrangements have 5 already been made for the briefing, and then DS Goddard 6 has sent an email saying what the surveillance detective 7 inspector wants or believes is the best way to proceed. 8 Q. That is DI Davies? 9 A. Yes. 10 Q. Yes. 11 So as far as you were aware, did you understand that 12 the firearms officers who were expected to deploy on 13 11 December had been asked to attend the briefing on the 14 10th? 15 A. I can't say if I knew at the time or not. 16 Q. Would you expect them to have been invited to the 17 briefing? 18 A. I would have, yes. 19 Q. Are you aware that, in fact, only one of the firearms 20 officers attended? 21 A. I am now, yes. 22 Q. What is your opinion of that? Do you think it is 23 a missed opportunity? 24 A. It is difficult for me to say. I am not a firearms 25 officer and I know that -- I know through my experience</p> <p style="text-align: center;">Page 18</p>
<p>1 of being involved in firearms operations, and being 2 present at firearms briefings, a lot of the times the 3 team leader for the firearms team will say in the 4 briefing, "We have had a pre-briefing at [their 5 location]", so I don't know if they have another way of 6 briefing or not. For me, certainly, it is unusual for 7 firearms officers not to be present at a briefing, but 8 I put the caveat in I have never been involved in 9 a firearms operation where officers have been briefed 10 days or day before the operation. They are usually 11 briefed in my experience on the day of the actual event. 12 Q. Right, but if the purpose of bringing everybody together 13 on 10 December was so that each faction of the operation 14 understood not only their role but the role of the other 15 factions then there was a piece of the jigsaw missing on 16 this occasion, wasn't there? 17 A. Potentially, again, it is a question that would have to 18 be posed to whoever at MO19 made the decision not to 19 send everyone. They may have decided -- there may have 20 been a draw on their resource that they couldn't put all 21 those officers there because they were involved in 22 something else and they had set about that one of the 23 firearms officers there then briefed them. I don't 24 know. 25 THE CHAIRMAN: Are you moving away from this email?</p> <p style="text-align: center;">Page 19</p>	<p>1 MS BLACKWELL: Yes, I am going to ask some other questions 2 about the briefing. 3 Could you put it back on, please? 4 THE CHAIRMAN: Thank you very much. 5 You sent that email to Mr Kinch and Mr Murray saying 6 that the FA1 had been submitted, assessed and 7 authorised? 8 A. Yes. 9 THE CHAIRMAN: Now, it hadn't been submitted, it hadn't been 10 assessed and it hadn't been authorised. 11 Did either Mr Murray or Mr Kinch -- 12 MS BLACKWELL: Or Mr Williams, sir, FE16. 13 THE CHAIRMAN: Or Mr Williams for that matter, point out to 14 you that this was not the case? 15 A. I don't remember whether it was pointed out to me, but 16 the only mistake in there is that an FA1 has been 17 submitted, assessed and authorised. An FA1 is obviously 18 an application for a firearms operation, so although 19 I have used the term FA1, we have obviously -- a request 20 has been made for a firearms operation. That request 21 has been assessed and it had been authorised. Albeit it 22 was not on the FA1. 23 THE CHAIRMAN: Yes. I don't think that is an answer to the 24 question. That is your mitigation, but what I am asking 25 is whether or not there was any response from any of the</p> <p style="text-align: center;">Page 20</p>

<p>1 three officers, including the officer who had decided it 2 was a firearms operation, to the effect that this was 3 not correct and that the -- well, that the application 4 had simply not been submitted? 5 A. I can't -- I can't remember, sorry. 6 THE CHAIRMAN: Yes. 7 MS BLACKWELL: If you had have been so informed by either 8 Mr Murray or Mr Williams, would you have ensured that 9 the FA1 form was completed? If for no other reason than 10 to make sure there was a full audit trail of firearms 11 authorisation forms. 12 A. No, if they had have come to me to say, "An FA1 has not 13 been completed", I probably would have said, "Does one 14 need to be completed?" And if they said, "No, I am 15 content in the way it has been dealt with", I would have 16 left it at that. I wouldn't have insisted on an FA1 17 being completed because, as I have said, an FA1 is 18 an application: can I have a firearms operation? And at 19 the time we had one. 20 Q. Going back to the briefing on 10 December, how long did 21 it last? 22 A. I can't remember. It wasn't particularly long. 23 An intelligence overview, short PowerPoint, I don't 24 know. I don't know, it wasn't very lengthy. Ordinarily 25 in a firearms briefing, you get the team leader from the</p> <p style="text-align: center;">Page 21</p>	<p>1 firearms team who will explain how the firearms team 2 will work, they will run through the traffic light 3 system, they will run through the dos and don'ts and 4 what we should do, either armed or unarmed officers. 5 Obviously that wasn't part of it, so that -- I don't 6 think that was part of it. 7 Q. Would that have been part of it had the firearms 8 officers turned up? 9 A. You would have to ask the firearms officers. I know on 10 the day there were separate briefings for the firearms 11 officers. 12 Q. You are talking about 11 December now? 13 A. Yes, so when they were being physically deployed on the 14 operation, I understand, although I wasn't present, 15 there were separate briefings there. 16 Q. Yes. 17 A. That is probably when the tactics of that day -- because 18 there were two separate firearms deployments, so the 19 tactics I am assuming would have been different. 20 Q. From what you have said, your attendance at the briefing 21 on 10 December was in no greater capacity than observer? 22 A. I was there to oversee it, as DC Kinch was a member of 23 my staff, and to -- I was going to be involved in 24 an operation, so it made sense for me to be at the 25 briefing as well.</p> <p style="text-align: center;">Page 22</p>
<p>1 Q. Let's move then to 11 December. 2 What time were you deployed on duty on that day? 3 A. I would have to check my statement. It was early hours 4 of the morning. I went and collected some police staff 5 and drove them to Cobalt Square, where they were to 6 assist us in supporting the operation, and then 7 I arrived at Cobalt Square. 8 Q. All right, let's look at the witness statement that you 9 made, I think on 16 December 2015, it is at FEO48. 10 Thank you, page 2, please. 11 Can we highlight the third paragraph down that 12 begins, "My role ..." 13 This is behind tab 3 in our hard copy bundle: 14 "My role on Friday, 11 December 2015 was to act as 15 an intelligence officer and to update FE16 [Mr Williams] 16 with intelligence that I received. I also took on the 17 role of liaising and on one occasion directing other 18 officers from the OCC." 19 Who is that? 20 A. Organised Crime Command. 21 Q. "Who were acting in a number of roles from support teams 22 on the ground, monitoring a Covert Monitoring Post and 23 assisting with observations and CCTV. During the course 24 of the operation, I updated FE16 with several pieces of 25 intelligence that I had received and I made welfare</p> <p style="text-align: center;">Page 23</p>	<p>1 checks on the staff in the CMP to ensure they had 2 sufficient staff and were not encountering any problems. 3 I made the decision to not start passing information to 4 FE16 that had come from this CMP, as it could become 5 confusing for them, assessing where I was obtaining the 6 information from. I was aware that FE16 was receiving 7 updates from staff who were working in the CMP." 8 This was how you described your role in the 9 statement that you made a number of days after the 10 operation itself. 11 A. Yes. 12 Q. Could we highlight that paragraph again, please. 13 In the middle of that paragraph, you refer to having 14 made welfare checks "on the staff of the CMP". 15 A. Yes. 16 Q. Did you make welfare checks on the staff of the CMP? 17 A. Yes, I did. 18 Q. Were you satisfied that they had sufficient staff? 19 A. Yes. I chose the staff in there based on their skills 20 and experience. 21 Q. Right. We will deal with that in a moment. 22 You also say that the checks that you made on the 23 staff in the CMP was to ensure that they were not 24 encountering any problems. 25 A. That's correct, yes.</p> <p style="text-align: center;">Page 24</p>

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<p>1 Q. We know that there was quite -- what I am going to 2 describe as a significant problem encountered in the 3 CMP, wasn't there?</p> <p>4 A. There was, their review function didn't work on the 5 machine.</p> <p>6 Q. Is there any reason why you didn't mention that in the 7 statement?</p> <p>8 A. Because it wasn't at that time, so at the start -- so 9 when we attended the C3000, once we had been established 10 there was an initial briefing by the TFC, everyone who 11 was involved introduced themselves, went round the room. 12 There was a briefing given by him, the briefing was then 13 put on a loop on the screens around C3000 and then 14 people went to their various roles. 15 Once they had gone in there, I then went and checked 16 on them and made sure they were all right, at that time, 17 when I checked on them, that had yet to have been 18 discovered.</p> <p>19 Q. Helpful as that answer is, it does not answer my 20 question, which was: why doesn't the reference to the 21 problem with the review function appear in this 22 statement?</p> <p>23 A. Because I didn't become aware of it at the time.</p> <p>24 Q. You were aware of it by the time you made this statement 25 four days after the deployment, weren't you?</p> <p style="text-align: center;">Page 25</p>	<p>1 A. Yes, I was, yes.</p> <p>2 Q. So why doesn't it appear in your statement?</p> <p>3 A. I don't know. Maybe -- maybe because it was discovered 4 by the CMP officers who were then, I believe, made the 5 TSU aware of it and they dealt with it. Because 6 I didn't physically get involved in it, I didn't think 7 it was appropriate for me to put it in my statement.</p> <p>8 THE CHAIRMAN: You were there in a supervisory capacity?</p> <p>9 A. I was with the SIO, yes. 10 My role was to take the intelligence and also to 11 direct other staff. Once the CMP was up and running, 12 and it was being dealt with, my primary role was to take 13 the intelligence and update FE16, which is what I was 14 doing at the time -- sorry, the TFC.</p> <p>15 THE CHAIRMAN: How does your failure to include in the 16 statement the fact that the review facility wasn't 17 working sit with the words "... and were not 18 encountering any problems"?</p> <p>19 A. Because when I went to check on them, they hadn't 20 encountered any problems and it was after that point 21 I had very little to do with the CMP.</p> <p>22 THE CHAIRMAN: Who took over your role?</p> <p>23 A. In overseeing the CMP?</p> <p>24 THE CHAIRMAN: Yes.</p> <p>25 A. I don't think it was specifically delegated. The</p> <p style="text-align: center;">Page 26</p>
<p>1 officers in there were dealing with it, I put five 2 officers in there in order that there were sufficient 3 people to review it and when I spoke to them and they 4 were told about the operation and what their role was, 5 and if they encountered any problems they could come in 6 and speak to either me or the SIO. So there was 7 an opportunity, so present at C3000 was myself, there 8 was a DCI, a DI, there were a couple of superintendents 9 around and there was also a detective sergeant from the 10 TSU. So they were aware of all of those people there, 11 so if they encountered any problems they could have come 12 to them.</p> <p>13 I accept the point that if there was a CMP manager, 14 that would have been the direct person to come to, but 15 there wasn't a CMP manager on --</p> <p>16 MS BLACKWELL: We are going to deal with that in a moment, 17 because you were asked to provide more information to 18 the inquiry, weren't you, which you set out in a witness 19 statement dated 1 April of this year, dealing 20 specifically with your role in the CMP.</p> <p>21 A. Yes.</p> <p>22 Q. Let's turn to look at that, please. It is at MPS3798. 23 That is behind divider 6.</p> <p>24 A. Thank you.</p> <p>25 Q. Paragraph 3:</p> <p style="text-align: center;">Page 27</p>	<p>1 "I do not believe a CMP manager was officially 2 designated."</p> <p>3 Thank you, Mr Coates:</p> <p>4 "It was myself who liaised with the officers 5 initially. I selected the officers and ensured they 6 were suitably for and comfortable taking on the role." 7 Could you help with that --</p> <p>8 A. It should be "suitable for" and comfortable taking on 9 the role.</p> <p>10 Q. All right, well let's just look at paragraph 6, please, 11 if you can scroll to there and see what you say about 12 that:</p> <p>13 "I cannot say if I was the most experienced. I had 14 only been on the unit for less than a year at this time. 15 The unit at the time consisted of three teams and from 16 memory all of the available staff were used in one role 17 or another. I did canvass the unit to establish which 18 officers were the most experienced in staffing a CMP, 19 and it was because of this the three officers from the 20 unit, albeit not my team, were selected."</p> <p>21 As the person overseeing the operation directly 22 under the SIO, and with the best overall knowledge of 23 the operation, I believe I was the most appropriate 24 person to oversee the CMP. The SIO was in attendance, 25 as were staff from the TSU, to deal with any technical</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 matters [I think that should be 'or'] provide any 2 advice." 3 Going back up to paragraph 5, please: 4 "My involvement with the CMP on 11 December was to 5 be a point of contact for the officers in the CMP. This 6 role involved making sure they were all in attendance 7 and suitably equipped. They were updated as to who from 8 the staff from the technical support unit were in 9 attendance and I initially told them that I would get 10 updates from them and deal with any queries that they 11 had." 12 Can we go, please, to paragraph 13, on the next 13 page: 14 "One of my responsibilities was to select staff to 15 serve in the CMP for the course of the operation. 16 I chose officers based on their skills and experience in 17 previously being deployed in such a role. I chose two 18 officers based on their ability to speak Turkish. 19 "The number of officers deployed (five) was designed 20 to ensure that there were enough officers present to 21 that the feed [I think that should be 'so that the feed 22 could be monitored], it could be reviewed if necessary 23 and still live monitored and also enable updates to be 24 passed to the SIO/TFC." 25 Let's just pause there for a moment.</p> <p style="text-align: center;">Page 29</p>	<p>1 Your statement sets out that it was your 2 responsibility to select the officers who were to 3 monitor the CMP and to effectively sit in that room, 4 listen to the probe and provide the intelligence that 5 was received to the officers in command. 6 A. Yes, that was the task that was given to them, yes. 7 Q. So how did you choose them? 8 A. First of all, I canvassed the members of the Organised 9 Crime Command that we had. 10 Q. Who? 11 A. So the central task force north that we had there. So 12 the six DSs, one acting as a DI, two DIs, I spoke to 13 people to find out who had previously done this role and 14 who previously has got experience of it. Officers' 15 names were given to me, Detective Constable Hawthorn has 16 previously served in the Tottenham area and is familiar 17 with -- 18 Q. I hesitate to interrupt, but I am going to probe you 19 more, please, about the identity of those to whom you 20 spoke in attempting to identify appropriate officers. 21 A. I probably would have spoken to all of them. 22 Q. Do you have any recollection of speaking to any of them? 23 A. Not specifically personal -- there is quite a number of 24 people, but I would have spoken to quite a number of 25 people. I probably would have spoken to the various</p> <p style="text-align: center;">Page 30</p>
<p>1 DIs, the various DSs. 2 Q. I would like you, if you can, please, doing the best you 3 can, with your recollection and referring to any note 4 that you made of any conversations to tell -- 5 A. I didn't make any notes -- sorry. 6 Q. Tell the inquiry with whom you spoke and who you 7 canvassed in order to identify suitable officers. 8 A. I couldn't tell you the exact identity of who I spoken 9 to. I canvassed the central task force north, the 10 officers that were present and the officers that were 11 working there at the time. That would have encompassed 12 the detective inspectors, the detective sergeants and 13 probably the serving detective constables at the time. 14 Q. Did you make any notes? 15 A. No, I did not. 16 THE CHAIRMAN: The date and time of that meeting? 17 A. It wasn't a meeting, because of the type of work that we 18 do, sir, people would have been in and out, so I would 19 have made it a point to try and speak to people -- 20 THE CHAIRMAN: When was it that you spoke to these people 21 and where? 22 A. I am assuming it would have been at our office, 23 I couldn't tell you when that was. I am assuming it 24 would have been around the time after I was tasked, we 25 decided that we were going to run a CMP.</p> <p style="text-align: center;">Page 31</p>	<p>1 MS BLACKWELL: I think you were describing to us that you 2 were given various names, I am going to describe that as 3 "a long list", from which I am going to suggest you made 4 a short list, is that what happened? 5 A. I can't recall. I can't recall being given a long list 6 and making a short list. I honestly cannot remember -- 7 I chose those officers specifically for their skills and 8 experience and training. 9 Q. Chose them from what? 10 A. From the serving officers at central -- I don't know if 11 I was given a list of 6 people or whether I was only 12 given 3 or whether I was given 10, but if I was given 13 more, I chose those officers on this based on their 14 specific skills. 15 Q. Can you remember what you did, because, forgive me, but 16 your answers to the questions are predicated with 17 "assume", "suppose", I am asking for your evidence as to 18 what actually happened, FE19. 19 A. I can't recall if I was given more names than the three 20 I selected and the two Turkish officers. 21 Q. So there may have been no selection process at all, you 22 may have been given three names and those were the three 23 that worked in the Covert Monitoring Post? 24 A. It could have been, but they were only selected because 25 they were suitable.</p> <p style="text-align: center;">Page 32</p>

<p>1 Q. Paragraph 13: 2 "One of my responsibilities was to select staff to 3 serve in the CMP for the course of the operation. 4 I chose officers [your words] based on their skills and 5 experience in previously being deployed in such a role." 6 A. Yes. 7 Q. You were going to tell us about the experience I think 8 that Mr Hawthorn had. 9 A. DC Hawthorn has previously served in the Tottenham and 10 Edmonton area for quite some time. He knows the area 11 very well and he has also served in gangs units down 12 there and he has also -- in my opinion he was also very 13 adept at dealing with the type of language that would be 14 used from experience in dealing with gangs and people. 15 Detective Constables -- 16 Q. If you are leaving him, can I just ask you to confirm 17 what the inquiry has received in a witness statement 18 from Assisting DS Leia Burgess: 19 "DC Paul Hawthorn's file did not record any training 20 for covert monitoring posts and this is confirmed in his 21 statement." 22 You referred to experience that he had of, I am 23 going to call it gang slang and the use of language. 24 A. Yes. 25 Q. Can you confirm that he had no experience of ever</p> <p style="text-align: center;">Page 33</p>	<p>1 working in a Covert Monitoring Post -- or training? 2 A. Neither -- no, I don't think he had -- he had training 3 of in there, but he had previously served within a CMP. 4 THE CHAIRMAN: You agree with Ms Blackwell, he had not had 5 previous experience? 6 A. I don't believe he had had previous training but he has 7 previously served within the role. 8 MS BLACKWELL: I think he told the inquiry yesterday that he 9 had sat in a Covert Monitoring Post on a different type 10 of operation. 11 A. Yes. 12 Q. Yes, but he didn't have any training? 13 A. No. 14 Q. No. 15 You were going to go on to tell us about the other 16 people that you selected? 17 A. DC Reddy, again has previously served within a Covert 18 Monitoring Post and what I should also say about 19 DC Hawthorn is he is also trained and experienced in 20 receiving and dealing with fast-time intelligence and 21 assessing it and disseminating it. 22 Q. Were you able to either watch live time or review 23 Mr Hawthorn's evidence from yesterday? 24 A. I saw some of it. 25 Q. Right.</p> <p style="text-align: center;">Page 34</p>
<p>1 Do you still contend that he was adept in listening 2 to probe material live time and reviewing it? 3 A. I didn't see enough of his evidence, I am not going to 4 judge him on the basis of a snippet that I saw. 5 Q. DS Reddy had experience of working in a covert monitor 6 post in 2008, didn't he, I think? 7 A. I didn't know the date, but I was aware that he had 8 previously served -- 9 Q. And his evidence was that he had received some informal 10 training in relation to that deployment? 11 A. Yes. 12 Q. That was a number of years prior to this deployment? 13 A. Yes. 14 Q. In your scope for appropriate candidates, did you ask 15 those with whom you spoke about the experience that some 16 of the officers might have of working in a Covert 17 Monitoring Post? 18 A. No, I asked them if they had previously served in 19 a Covert Monitoring Post. And they had. So they were 20 aware of the rules of evidence around it, their 21 responsibility for securing the evidence and maintaining 22 the integrity of it, as well as passing that information 23 and recording it properly. 24 Q. What about the other officers who were appointed? In 25 relation to their training and experience, please?</p> <p style="text-align: center;">Page 35</p>	<p>1 A. So DS Reddy, again, DS Reddy is a trained surveillance 2 officer and has been deployed on a number of occasions, 3 so he is adept at listening, assessing and obtaining 4 information. 5 He is also trained and experienced in dealing with 6 fast-time intelligence, assessing that, and dealing with 7 it. And on top of that, he also provides drugs expert 8 evidence at court where he translates slang in drugs 9 matters and gang cases. 10 And in the case of FE12, FE12, again, is a fully 11 trained and very experienced surveillance officer, who 12 is adept at monitoring conversations, recording them and 13 dealing with the salient points. He is also trained and 14 experienced at dealing with fast-time intelligence, 15 assessing it and dealing with which should be 16 disseminated. 17 Q. In terms of his experience of working in a Covert 18 Monitoring Post, he had once performed that role in 19 2009? 20 A. Yes, he has previously served in a CMP, yes. 21 THE CHAIRMAN: The point Ms Blackwell is making he had once 22 undertaken such a role six years earlier. 23 A. Yes, I fully understand -- 24 THE CHAIRMAN: Did you know that at the time? 25 A. I don't recall whether I knew how long ago it was.</p> <p style="text-align: center;">Page 36</p>

<p>1 I may have done, I don't know.</p> <p>2 MS BLACKWELL: Who told you that he had one experience, did</p> <p>3 he tell you or did the people whose opinion you</p> <p>4 canvassed tell you that?</p> <p>5 A. I would have thought that the people I canvassed told me</p> <p>6 that he has previously done it or he may have</p> <p>7 volunteered himself that he had previously served within</p> <p>8 a CMP. I don't know -- I have no recollection of me</p> <p>9 asking what his experience was.</p> <p>10 A Covert Monitoring Post is an important thing and</p> <p>11 it is a very intrusive thing that we use. But just to</p> <p>12 try and put it into context as to what it is, it is</p> <p>13 listening to conversations, accurately trying to record</p> <p>14 them and securing the evidence and the integrity around</p> <p>15 that evidence to be used. And the intelligence.</p> <p>16 In my experience, I am a CMP trained manager now,</p> <p>17 and in dealing with the cases, very little is put in</p> <p>18 terms of actually listening to it, attending a course</p> <p>19 does not make you any more adept at hearing. Attending</p> <p>20 a course doesn't make you any better at translating it.</p> <p>21 The people you are going to send on a course to go for</p> <p>22 these things should be people who are suitably from the</p> <p>23 covert world in my opinion and I think those officers</p> <p>24 fit that bill.</p> <p>25 Are they able to deal with recording information</p> <p style="text-align: center;">Page 37</p>	<p>1 that they overhear? Yes. They have previously done it</p> <p>2 and also they have previously deployed in surveillance</p> <p>3 operations where their job is to record information</p> <p>4 accurately and get it back to people.</p> <p>5 Are they trained detectives to know the rules of</p> <p>6 evidence and secure it to such a way that it would be</p> <p>7 admissible in court? Yes, they are. Very experienced</p> <p>8 and to such a degree that the evidence was used in court</p> <p>9 in a successful prosecution.</p> <p>10 That is why I was happy to use those officers.</p> <p>11 I understand about the training, and whether training</p> <p>12 should take place, but in my experience of proactive</p> <p>13 policing I was never aware of an CMP course, I have</p> <p>14 never been offered one, none of the staff that have ever</p> <p>15 worked for me have ever been offered them whilst they</p> <p>16 have been under my command, so I didn't know the course</p> <p>17 even existed.</p> <p>18 Q. But it did exist, didn't it?</p> <p>19 A. I believe it does, yes. I don't know whether it exists</p> <p>20 in the Metropolitan Police, but I think it exists</p> <p>21 outside. My training as a CMP manager does not come</p> <p>22 from the Metropolitan Police, it comes from -- I think</p> <p>23 it is either the National Crime Agency or the College of</p> <p>24 Policing.</p> <p>25 Q. Did it matter to you that none of the people who were</p> <p style="text-align: center;">Page 38</p>
<p>1 deployed to the Covert Monitoring Post on 11 December</p> <p>2 had had any formal training to work in such?</p> <p>3 A. I wasn't aware that formal training was required --</p> <p>4 Q. That is not an answer to the question. Did it matter to</p> <p>5 you that none of the people who were identified to work</p> <p>6 in the Covert Monitoring Post had had any formal</p> <p>7 training?</p> <p>8 A. You are asking me to consider a point that I didn't</p> <p>9 consider because I wasn't aware it existed.</p> <p>10 Q. Does it matter to you now that none of the people</p> <p>11 identified to work in the Covert Monitoring Post had had</p> <p>12 any formal training?</p> <p>13 A. In retrospect, if I was to run an operation now, would</p> <p>14 I insist on putting people through the College of</p> <p>15 Policing training, yes, I would. But I would also add</p> <p>16 the caveat that I am still satisfied that those officers</p> <p>17 were more than capable to carry out the roles they were</p> <p>18 given, I had two Turkish officers in there so that one</p> <p>19 could listen one could listen. I had three other</p> <p>20 officers, so that one could listen, one could review,</p> <p>21 one could relay. And if whilst one was relaying</p> <p>22 something else happened the other officer deals with</p> <p>23 them.</p> <p>24 You would never ordinarily put five officers in</p> <p>25 a CMP, it's too many people in there, but for the</p> <p style="text-align: center;">Page 39</p>	<p>1 circumstances of that, because we had to cover the</p> <p>2 language issues, and we had to cover relaying live, this</p> <p>3 was not a case of recording evidence to build</p> <p>4 a conspiracy later down the line, this was a live</p> <p>5 operation to support the intelligence picture around</p> <p>6 a firearms deployment.</p> <p>7 Q. We are going to move in a moment to talk about the setup</p> <p>8 of the CMP and who was asked to perform which role.</p> <p>9 I would just like to pause and ask you about your</p> <p>10 opinion as to the efficacy of what took place on</p> <p>11 11 December in the Covert Monitoring Post.</p> <p>12 Were you able to follow, at least in part, the</p> <p>13 evidence of Mr Hawthorn yesterday where he was asked to</p> <p>14 consider his note of what he listened to as against the</p> <p>15 transcript of the audio probe?</p> <p>16 A. I saw some of it.</p> <p>17 Q. Right. Have you taken the trouble in your preparation</p> <p>18 for this inquiry, to read through the transcript of the</p> <p>19 audio probe and to compare it with the notes that were</p> <p>20 provided by Mr Hawthorn, Mr Reddy and FE12?</p> <p>21 A. I haven't compared the notes of those officers to that</p> <p>22 transcript.</p> <p>23 Q. If I were to ask you your opinion as to whether or not</p> <p>24 what was produced during the course of that morning by</p> <p>25 those officers was adequate and reasonable, what would</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 your answer be?</p> <p>2 A. I haven't read them. So I couldn't comment.</p> <p>3 The prosecution of the conspirators in this matter</p> <p>4 when it started taking place, as a result of the</p> <p>5 post-incident procedure, and ciphers were given to</p> <p>6 officers, I was away from the actual prosecution from</p> <p>7 it. So I remained away from that at the time, so --</p> <p>8 THE CHAIRMAN: You seem to be focusing on the success of the</p> <p>9 prosecution, rather than the intelligence and</p> <p>10 information that was being received.</p> <p>11 A. That is not my intent.</p> <p>12 THE CHAIRMAN: Because more than once you have said, "It led</p> <p>13 to the successful prosecution", and that is a fact. But</p> <p>14 was not the nature of the intelligence that was being</p> <p>15 received important in deciding how the operation should</p> <p>16 be carried out?</p> <p>17 A. Yes.</p> <p>18 THE CHAIRMAN: Mr Butt?</p> <p>19 MR BUTT: Sir, I was simply going to remind you that</p> <p>20 Mr Hawthorn's note, which has been brought up, was one</p> <p>21 he created after his deployment in the CMP, as a precis</p> <p>22 to assist the Crown Prosecution Service I believe in the</p> <p>23 charging advice. So it was not a note that he was</p> <p>24 making at the time that was he was taken to yesterday,</p> <p>25 it was a precis he created afterwards for the CPS.</p> <p style="text-align: center;">Page 41</p>	<p>1 THE CHAIRMAN: Thank you.</p> <p>2 MS MURPHY: Sir, but of course that is based on DI Reddy's</p> <p>3 contemporaneous record, it's word for word as was</p> <p>4 identified yesterday.</p> <p>5 THE CHAIRMAN: Thank you.</p> <p>6 MS BLACKWELL: We have dealt with your choice of the</p> <p>7 operatives within the room, let me ask you now about the</p> <p>8 direction that they were given in terms of what each of</p> <p>9 them should do and the role that they should perform.</p> <p>10 You have accepted that in the absence of any CMP</p> <p>11 manager, which we will also come to, it was your role to</p> <p>12 organise the operatives and to make sure that they had</p> <p>13 sufficient resources available to them.</p> <p>14 A. Yes, I -- yes, I would take that as my role, yes.</p> <p>15 Q. Talk us through your setting up of the CMP that morning?</p> <p>16 A. I personally didn't set it up. The technical support</p> <p>17 unit set it up several days prior. At the time they set</p> <p>18 it up, one of the officers who was to serve in the CMP</p> <p>19 was there with them and trained on how to use the</p> <p>20 machinery, as I understand it. I wasn't present, but</p> <p>21 I understand that is what occurred and from memory --</p> <p>22 and then on the day, they were taken into the CMP, they</p> <p>23 were shown where it was, and the TSU officers again ran</p> <p>24 through with the officers how the machinery should work.</p> <p>25 Q. Were you present whilst that was happening?</p> <p style="text-align: center;">Page 42</p>
<p>1 A. No.</p> <p>2 Q. So how do you know that it happened?</p> <p>3 A. How do I know it happened?</p> <p>4 Q. Yes.</p> <p>5 A. Because I have been watching the evidence come through</p> <p>6 and I have seen some of that come through here and I was</p> <p>7 also -- I am also aware that the TSU officers went in</p> <p>8 there. I would have made sure, when I went in there and</p> <p>9 I spoke to the officers, are they happy, are they</p> <p>10 content, do they know how everything was working.</p> <p>11 I would have found out then. I wasn't present when they</p> <p>12 got there.</p> <p>13 Q. This inquiry is interested in your evidence that you can</p> <p>14 give about your involvement on the morning, not what you</p> <p>15 have seen other witnesses give or not what you have</p> <p>16 gleaned from reading documents but your recollection of</p> <p>17 your experience, so, do we take it from your answer to</p> <p>18 that question that you were not present when the TSU</p> <p>19 operatives explained the equipment to the CMP officers?</p> <p>20 A. I don't remember being present, but what I do remember</p> <p>21 is I spoke to the CMP officers and asked them were they</p> <p>22 happy, had they been shown how to use it and were they</p> <p>23 aware of how to use it, and they said yes.</p> <p>24 Q. Right.</p> <p>25 You were in a very fortunate position in that you</p> <p style="text-align: center;">Page 43</p>	<p>1 were carrying out the role of CMP officer, I am not</p> <p>2 going to say manager, because you were not a CMP</p> <p>3 manager, there wasn't a CMP manager, but you were</p> <p>4 overseeing what was going on in the Covert Monitoring</p> <p>5 Post, but you were also a senior intelligence officer,</p> <p>6 weren't you, for the operation?</p> <p>7 A. Yes, that is why I removed myself from dealing with the</p> <p>8 CMP.</p> <p>9 Q. We will come to that in a moment.</p> <p>10 What did you stay to the operatives in that room</p> <p>11 about the intelligence as you knew it to be on the</p> <p>12 morning of 11 December in order to assist them as to</p> <p>13 what they might be listening to?</p> <p>14 A. They were present at the briefing that was given on the</p> <p>15 morning and that was their briefing as to what the</p> <p>16 operation was being conducted.</p> <p>17 Q. This is the briefing that took place at 5.00 am in the</p> <p>18 control room?</p> <p>19 A. Yes.</p> <p>20 Q. You were present there too?</p> <p>21 A. Yes.</p> <p>22 Q. Who presented that briefing?</p> <p>23 A. DCI Williams.</p> <p>24 Q. Anybody else?</p> <p>25 A. I don't recall.</p> <p style="text-align: center;">Page 44</p>

<p>1 Q. Did you form any part of that presentation?</p> <p>2 A. I don't believe so.</p> <p>3 Q. Well, is that a yes or a no?</p> <p>4 A. No. I don't believe so.</p> <p>5 Q. You don't believe so?</p> <p>6 A. No.</p> <p>7 Q. So you didn't?</p> <p>8 A. I don't know.</p> <p>9 Q. You don't know?</p> <p>10 A. Sorry, I didn't. From my memory, I didn't take part in</p> <p>11 that briefing and say anything.</p> <p>12 Q. Was it recorded?</p> <p>13 A. No, not to my knowledge.</p> <p>14 Q. Do you think it should have been recorded?</p> <p>15 A. There is no requisite for it to be recorded. In</p> <p>16 retrospect, would it be a good idea so that we can look</p> <p>17 at things now? I don't see it being a bad idea.</p> <p>18 Should it have been recorded? There was no rules to</p> <p>19 say we should have recorded it, because it wasn't</p> <p>20 a firearms briefing.</p> <p>21 Q. What was said to those present at the briefing about the</p> <p>22 state of the intelligence as at that time?</p> <p>23 A. I can't recall exactly what was said. But the briefing</p> <p>24 would have encompassed the fact that it was a firearms</p> <p>25 operation, intelligence had been received that there was</p> <p style="text-align: center;">Page 45</p>	<p>1 a planned prison escape and who the believed the</p> <p>2 potential people to be involved in that were and how the</p> <p>3 operation was to be unfolding.</p> <p>4 Q. Do you give that evidence from your recollection or are</p> <p>5 you assuming that that is what was done?</p> <p>6 A. I seem to remember that is what was done.</p> <p>7 Q. Right.</p> <p>8 A. Because it would have been from the PowerPoint briefing,</p> <p>9 which was constantly on a loop for everybody to see.</p> <p>10 Q. Did you provide any further intelligence to the</p> <p>11 operatives in the Covert Monitoring Post, over and above</p> <p>12 what was presented during that briefing?</p> <p>13 A. No, I did not.</p> <p>14 Q. Were you involved in doling out the responsibilities for</p> <p>15 each of the officers in the Covert Monitoring Post?</p> <p>16 A. Yes, I put them in there and I instructed them on what</p> <p>17 to do.</p> <p>18 Q. What did you tell them to do?</p> <p>19 A. I believe they were told that there should be two</p> <p>20 officers to convey updates into the TFC and SIO, and</p> <p>21 therefore that would leave two or three officers to be</p> <p>22 able to monitor the material coming through.</p> <p>23 Q. Did you become aware over the course of the morning that</p> <p>24 the occupants of the Audi were speaking in English?</p> <p>25 A. I am aware, but I couldn't tell you when I became aware</p> <p style="text-align: center;">Page 46</p>
<p>1 of that.</p> <p>2 Q. Right.</p> <p>3 Before you became aware of that, did you provide</p> <p>4 specific roles for the Turkish speaking officers?</p> <p>5 A. I believe they were in there as monitors, one of the</p> <p>6 Turkish officers has previously served in a CMP as well,</p> <p>7 and they were told -- they were there to monitor, as</p> <p>8 well as speaking Turkish, they can also speak English,</p> <p>9 so they were there to assist and monitor.</p> <p>10 Q. How was Mr Hawthorn chosen as the member of the CMP who</p> <p>11 would listen and repeat what he was hearing?</p> <p>12 A. I can't remember. I can't remember how specifically,</p> <p>13 but as I have said, in terms of his experience of</p> <p>14 dealing with fast-time intelligence, and also knowing</p> <p>15 the local area, it would make sense that he is one of</p> <p>16 the logical choices.</p> <p>17 Q. Did you assign him that role?</p> <p>18 A. I can't remember.</p> <p>19 Q. Did you say to him, "This is what you have to do, you</p> <p>20 have to listen at all times and repeat the important</p> <p>21 aspects of what you are hearing"?</p> <p>22 A. No, I did not do that. Like I have said, he has</p> <p>23 previously served within a CMP, and I was aware of that,</p> <p>24 so I was happy he understood what his role was, and also</p> <p>25 he has previously dealt with intelligence coming in and</p> <p style="text-align: center;">Page 47</p>	<p>1 assessing it and recording it, and passing it on. And</p> <p>2 he is also an experienced detective, so he knows what is</p> <p>3 needed from an evidential standpoint.</p> <p>4 Q. You mentioned being happy that he was suitable to the</p> <p>5 role and had suitable experience, how did you satisfy</p> <p>6 yourself of that?</p> <p>7 A. In my selection of him before? I didn't satisfy myself</p> <p>8 of it on the day. All of the officers in there, the</p> <p>9 three that I selected from the Organised Crime Command,</p> <p>10 were suitable to be doing the monitoring.</p> <p>11 Q. Right?</p> <p>12 A. DC Hawthorn ended up being the person doing the</p> <p>13 monitoring. I was content with him being there and</p> <p>14 doing that because he knows the local area.</p> <p>15 Q. What I am asking you is how was he identified to perform</p> <p>16 that role?</p> <p>17 A. Specifically on that day?</p> <p>18 Q. Yes.</p> <p>19 A. I can't recall. I can't recall.</p> <p>20 Q. Did you assign him that role?</p> <p>21 A. I can't recall. It is likely.</p> <p>22 Q. All right. If you didn't assign him that role, who</p> <p>23 would have assigned him that role?</p> <p>24 A. It may have been between the three officers they</p> <p>25 decided, "I will listen and us two will relay". The</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 Turkish officers wouldn't have been put in a position to 2 relay because anything that was in Turkish they would 3 have been required for in there, so it may have been 4 between three officers they decided us two will relay 5 and you listen or it may have been that I directed them. 6 I can't remember this far back. 7 Q. Did you provide them with any written directions as to 8 who should perform which role? 9 A. No. 10 Q. Did you provide them with a written crib sheet of 11 intelligence that was known as of that time, that had 12 been set out in the briefing? 13 A. No, I can't recall whether they had a copy of the 14 briefing. 15 Q. Who devised the scheme that one or two officers would 16 physically walk into the control room with the 17 information written down on a piece of paper? 18 A. I think that was me, I think I said that they should 19 come in and update the TFC and SIO and the reason 20 I was – there were two of them there, is so that whilst 21 one is doing it, if anything pertinent comes in, the 22 other officer can get it and then they can overlap, so 23 hopefully there is at least one officer there who can 24 relay anything fast time that needs to come through. 25 Q. Who devised the plan that Mr Hawthorn would repeat what</p> <p style="text-align: center;">Page 49</p>	<p>1 he was listening to, rather than each of the officers 2 themselves listening to the product of the probe through 3 their own headphones? 4 A. I can't recall, I think that may have been the officers 5 themselves. 6 Q. Not you? 7 A. I can't recall. 8 Q. Because using Mr Hawthorn in that way, unnecessarily, 9 I am going to suggest to you, involved an additional 10 level of potential human error, didn't it? 11 A. How? 12 Q. Because Mr Hawthorn yesterday conceded that for the 13 period of time that he was repeating what he had just 14 heard to his fellow officers, he was missing what was 15 being said by the occupants of the Audi, or could have 16 been missing that. 17 A. But the two Turkish officers were there, that is why 18 I said that whilst the two officers are relaying, there 19 will always be three officers there to listen. Now if 20 one of those officers needed a toilet break or something 21 else, then there would still be two officers there able 22 to listen. The Turkish officers were also present to 23 listen to what was being said and there was 24 an opportunity for it to be discussed with them also. 25 Q. Did you hear Mr Hawthorn give any evidence that he spoke</p> <p style="text-align: center;">Page 50</p>
<p>1 to the Turkish officers through the course of the Covert 2 Monitoring Post that morning? 3 A. Not in the small bits that I saw, no. 4 Q. No. 5 But your evidence is that using Mr Hawthorn in that 6 way to repeat what he was hearing was not something that 7 you had insisted upon? 8 A. I don't believe so. 9 Q. All right. 10 THE CHAIRMAN: Do you agree that the system which 11 Mr Hawthorn described, of listening and repeating 12 creates the risk that as far as that person is 13 concerned, they will miss something which is being said 14 whilst they are repeating what they have heard? 15 A. If you have only got one person listening, you will 16 always run that risk. But, as I tried to say, and 17 I don't want to put words into DC Hawthorn's mouth. 18 THE CHAIRMAN: No, he has already given evidence, you won't. 19 A. Whilst he was listening, the Turkish officers were 20 there. There was always going to be two or three 21 officers present with the ability to listen. So whilst 22 he is listening and speaking to the officers, I would 23 like to think that the Turkish officers were also 24 listening and if he did miss anything, they picked it up 25 to say, "Hold on, he has just said this", but I can't --</p> <p style="text-align: center;">Page 51</p>	<p>1 THE CHAIRMAN: That would depend upon the Turkish officers 2 knowing that their job was to not simply interpret the 3 Turkish into English but to be able to listen and ensure 4 that nothing was missed? 5 A. I would like to think that they would do that, yes. As 6 opposed to just dealing with Turkish language. 7 MS BLACKWELL: Whose job was it to ensure that they did know 8 that? 9 A. Probably mine. I would like to think that they were 10 aware of it. 11 Q. Were they? Did you assure yourself that they were -- 12 A. It is six years later, almost. I can't recall exactly 13 what was said to them but -- when I go to brief people, 14 I like to think I do a good job of it. So in my 15 experience, I do brief people correctly. So I would 16 like to think that I did brief them correctly. You are 17 asking me to recall exactly what I said many years ago 18 and I can't recall exactly what that was. 19 Q. You had an opportunity to set out in detail what you did 20 by way of briefing and overseeing the Covert Monitoring 21 Post in your witness statement in December 2015, didn't 22 you? 23 A. Yes, when I wrote in there what my role was and what 24 I did, yes. I mean I could have expanded on it with 25 a bit more information at the time, and I haven't.</p> <p style="text-align: center;">Page 52</p>

<p>1 Q. Could we look back at your witness statement, please, 2 behind divider 6. 3 This is MPS3798. Page 2, please, Mr Coates, 4 paragraphs 14, 15 and 16: 5 "The number of officers deployed (five) was designed 6 to ensure there were enough officers present [so] that 7 the feed could be monitored, it could be reviewed if 8 necessary and still live monitored and also enable 9 updates to be passed to the SIO/TFC. 10 "The staffing numbers enabled two officers to 11 listen, with one able to review, one to pass updates and 12 still keep two officers listening. One of the officers 13 had previous experience of also working the local area 14 that the deployment was in and that individuals involved 15 were from. 16 "The Turkish officers were deployed as the 17 investigation was against Turkish gangs, so this could 18 assist with any language issues if any communications 19 were in Turkish. I believe it is a role at least one 20 them has previously performed before also, but I am not 21 certain." 22 As we know, there was a problem with the 23 review/rewind facility on the equipment, wasn't there? 24 A. Yes. 25 Q. Which presented a difficulty in anybody being able to</p> <p style="text-align: center;">Page 53</p>	<p>1 review what was said? 2 A. Yes. 3 Q. Were you satisfied prior to the Covert Monitoring Post 4 starting up on the morning of 11 December that the 5 equipment was working? 6 A. I was aware that it had been tested when it was 7 installed and, as I have said earlier on, when I went in 8 and spoke to the officers and asked if they were happy 9 they knew how everything worked, they were happy -- when 10 it became a problem as to how it didn't work, I don't 11 know when that was, I believe it was very early on. But 12 I don't recall when that was. Once we had done the 13 briefing and I had gone round and spoken to people in 14 the CMP and they were happy, I then took upon myself to 15 deal with other aspects of the operation. 16 Q. How did you become aware that the review facility wasn't 17 working? 18 A. I can't remember. 19 Q. What did you do when that information came to your 20 attention? 21 A. I can't remember. I don't believe I did -- I mean for 22 me, I couldn't physically do anything. I am aware that 23 there were TSU officers there who could try and assist 24 with it. I am aware that it became apparent that it 25 couldn't be reviewed and I am aware, although I don't</p> <p style="text-align: center;">Page 54</p>
<p>1 know when I became aware, that the decision was made not 2 to do anything with it because that would remove the 3 feed completely. I don't remember when that decision 4 was made and I don't remember who made it. 5 Q. Were you aware that the TSU officers were attempting to 6 solve the problem? 7 A. I am aware that they did, I don't know when I became 8 aware of that. 9 Q. So you had no input into the making of arrangements in 10 order to get the TSU engineers into the room and to see 11 what was wrong with the function and why it was 12 malfunctioning? 13 A. I wouldn't have thought so. If I was made aware there 14 was a fault with it I would have directed the officers 15 to the TSU officers that were sat directly across from 16 me and to speak to them to try to resolve it. 17 Q. Just to recap where we have reached so far, it was your 18 responsibility to identify suitable operatives and that 19 is what you say you did? 20 A. Yes, ma'am. 21 Q. Yes. It was your responsibility to ensure that those 22 operatives were suitably resourced and were comfortable 23 with the equipment and that you did? 24 A. Yes, I believe so. 25 Q. Thereafter, they were left to their own devices?</p> <p style="text-align: center;">Page 55</p>	<p>1 A. Yes. They were in there, and like I said I removed 2 myself from dealing with the CMP, because I was ... 3 I didn't want to be passing any other updates from there 4 to the TFC, so I didn't want a confusion of what 5 information was coming from the probe and what 6 information was coming from intelligence. So I removed 7 myself from that. 8 Q. At no point were they given by you any instruction on 9 how to perform their roles? 10 A. No, not how to write down and record it, no. 11 Q. At no point during the course of the morning did you 12 provide any update to them of any intelligence of which 13 you were aware? 14 A. No, I wouldn't do that. 15 Q. You wouldn't do that? 16 A. No. 17 Q. Why not? 18 A. They are in there, listening to what is going on. 19 I would equate it to telling a witness something before 20 you have taken a statement from them. I want what they 21 are listening to be exactly what they are hearing. Now 22 if I start putting gists of intelligence, it is 23 intelligence, it is not fact, if I start putting that 24 towards them, it could influence how they interpret 25 things, so I would not -- in my experience and even now</p> <p style="text-align: center;">Page 56</p>

1 as a CMP manager, I would not give them intelligence.
 2 Q. They have been given intelligence during the course of
 3 the 5.00 am briefing, hadn't they?
 4 A. They had been given intelligence about what the
 5 operation was about.
 6 Q. Yes.
 7 A. But any other specific intelligence I wouldn't pass
 8 them.
 9 Q. You became aware, didn't you, of at some point during
 10 that morning, and I am going to ask you specifically
 11 about when, that according to intelligence received, the
 12 gang had only managed to source an imitation firearm?
 13 A. That's correct, yes.
 14 Q. Let's just interpose that evidence whilst we are dealing
 15 with the Covert Monitoring Post, please.
 16 When did you become aware of that intelligence?
 17 A. It was early on, I think it was just prior to 7.00 am,
 18 something like that.
 19 Q. What did you do with that intelligence, when it came to
 20 your attention?
 21 A. I immediately made the TFC aware.
 22 Q. Using which words, please?
 23 A. I couldn't tell you what words I used this far back.
 24 I would have made him aware that the firearm -- the gist
 25 that you have said, I would have made him aware that

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1 they have only managed to source a firearm --
 2 Q. An imitation firearm.
 3 A. An imitation firearm, my apologies.
 4 Q. Right.
 5 I am just going to refer to Mr Williams's
 6 handwritten log. We don't need to put this up, let's
 7 just leave your witness statement up there for the
 8 moment.
 9 The way in which Mr Williams has recorded this is in
 10 the following terms:
 11 "Intelligence suggests they will have at least
 12 an imitation firearm at the time of the offence, no
 13 intel they have it now."
 14 Do you think you said to Mr Williams that they will
 15 have "at least an imitation firearm", or do you think
 16 you said to him they have only managed to source
 17 an imitation firearm?
 18 A. I believe it would have been they have only managed to
 19 source an imitation firearm. But that intelligence, as
 20 you -- hopefully you are aware -- was from the day
 21 previously, so in the times that spanned between that,
 22 anything could have happened.
 23 Q. What time the day previously?
 24 A. I believe it is just prior to 10.00 pm.
 25 Q. 10.00 pm. So the night previously, rather than the day

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1 previously?
 2 A. Yes.
 3 Q. Yes.
 4 Did you consider it appropriate to inform those in
 5 the Covert Monitoring Post that --
 6 A. No.
 7 Q. I have not finished the question yet.
 8 A. Sorry.
 9 Q. That as of 7.00 that morning, the intelligence that you
 10 had received was that the gang had only managed to
 11 source an imitation firearm?
 12 A. No.
 13 Q. Why not?
 14 A. For the reasons I have set out. That is intelligence,
 15 and it is also quite historic in terms of it is many
 16 hours old, anything could happen in between that and
 17 I want them to listen, record what they have got,
 18 disseminate it to the TFC, who will have access to all
 19 of the information, as will the SIO, and they can make
 20 an informed decision based on you all of the factors.
 21 I did not want to taint what they were listening to.
 22 Q. Didn't you think it was important to make them aware of
 23 any conversation that they might overhear on the probe
 24 about whether or not the gang had a real or an imitation
 25 firearm?

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1 A. I don't -- no, I didn't think to make them aware of it.
 2 THE CHAIRMAN: That is not the question.
 3 A. I didn't think -- sorry, could you repeat?
 4 MS BLACKWELL: Didn't you think it was important to tell
 5 those who were carrying out the job of listening in the
 6 Covert Monitoring Post to listen out for any
 7 conversation about whether or not the gang had a real or
 8 an imitation firearm?
 9 A. No, I didn't.
 10 As I have said, that could taint it, it could be
 11 that they mishear something, they could be listening for
 12 something that is firearm and they misinterpret it
 13 because I have put that in their head.
 14 THE CHAIRMAN: You of course at that stage don't know that
 15 the playback is not going to work, so there is no room
 16 for misinterpretation if the playback is working and you
 17 can hear it, is there?
 18 A. That seems a valid point --
 19 THE CHAIRMAN: Thank you.
 20 A. -- I don't know what time the playback was discovered to
 21 not be working.
 22 MS BLACKWELL: Sir, is that a convenient moment for to us
 23 take our morning break?
 24 THE CHAIRMAN: Yes. 11.30.
 25 MS BLACKWELL: Thank you.

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<p>1 THE CHAIRMAN: Very good. 2 (11.17 am) 3 (A short adjournment) 4 (11.30 am) 5 MS BLACKWELL: Thank you, sir. 6 THE CHAIRMAN: Yes. 7 MS BLACKWELL: In your evidence this morning, you have told 8 the inquiry that your expectation was, in relation to 9 the Turkish speaking officers, that they would be 10 listening and forming part of what was taking place in 11 the Covert Monitoring Post. 12 A. Yes, all the officers were in there and they could all 13 hear what was going on, so I would expect all of them to 14 play a role in it. 15 Q. Right, it is specifically in relation to the Turkish 16 officers, did you expect them to be providing verbal 17 updates to FE12 and Mr Reddy? 18 A. I would have expected them to, to pick up any sort of 19 slack. It may be that whilst they are listening to it, 20 they are listening to it and DC Hawthorn is providing 21 it, they think everything is going over there, I can't 22 comment on what -- I would have expected them to listen, 23 yes. 24 Q. Not just listen, to provide a verbal update? 25 A. If they heard something, yes, I would expect them to</p> <p style="text-align: center;">Page 61</p>	<p>1 provide that as an update, yes. As any police 2 officer -- 3 Q. Sorry? 4 A. As any police officer in there. 5 Q. The inquiry has had read into the record the evidence of 6 FE24 and FE25, who are the Turkish officers. 7 FE24 was told to listen and make notes. 8 FE25 was told to translate anything spoken from 9 Turkish into English. 10 Neither of them have provided evidence that they 11 were either asked to or did provide any verbal update. 12 Does that surprise you? 13 A. Well, one of them has said listen and make notes -- 14 Q. Yes. 15 A. -- but I would expect those notes, if they deem them 16 important enough to speak to them, to speak to the 17 officers in there. 18 Q. Were the officers in the Covert Monitoring Post aware of 19 the importance of overhearing the conspirators in the 20 Audi speaking about live firearms? 21 A. Again, I didn't give them a specific thing to listen to, 22 to say listen out for this, listen out for that, 23 I expected them to listen to what was being said, and 24 report back what was being said. 25 Q. If they had heard the occupants of the Audi in certain</p> <p style="text-align: center;">Page 62</p>
<p>1 terms talking about the possession of live firearms and 2 ammunition, what would have been the effect of the TFC 3 receiving that information? 4 A. You would have to ask the TFC. 5 Q. What do you think the effect would have been? 6 A. I am not a TFC. 7 THE CHAIRMAN: No, I know, but you are being asked what you 8 think his assessment would have been? You may one day 9 be a TFC, so ... 10 A. I don't plan to be, sir, but thank you. 11 THE CHAIRMAN: Yes. 12 A. What would -- the only way I can equate to it is if I am 13 running a surveillance operation and I am the team 14 leader and information comes to me that the members of 15 people we are following are in possession of firearms. 16 MS BLACKWELL: Live firearms. 17 A. Live firearms. 18 Q. Yes, what would you do? 19 A. That would lead me to then quickly risk assess where it 20 was, whether we had covert control of these people and 21 request some firearms support. 22 Q. Well, wouldn't that have led, almost certainly, to 23 an arrest? 24 A. Well, a stop, hopefully, at some point, if safe and if 25 we had to do so. Sometimes we will receive intelligence</p> <p style="text-align: center;">Page 63</p>	<p>1 around people who are in possession of firearms and we 2 will put them under surveillance, but we will lose them 3 before we can safely detain them. So it is not always 4 going to end in an arrest, it depends on a number of 5 circumstances. 6 Q. Can we just deal with surveillance for a moment, as you 7 have mentioned it. 8 Towards the beginning of your evidence, you said 9 that, in relation to Ozcan Eren, he was last surveilled 10 on 7 December? 11 A. I think so, yes. 12 Q. All right. You were aware of the crucial role that he 13 was understood to be playing in the escape plan, weren't 14 you? 15 A. Yes. 16 Q. Do you know of any reason why surveillance was not 17 arranged on that individual between 7 and 11 December? 18 A. I don't know exactly why it wasn't done, there could be 19 a number of reasons. 20 So Ozcan Eren wasn't put under constant 21 surveillance, first of all because it is extremely 22 labour intensive to do so. 23 Also Ozcan Eren lives -- he doesn't live, he 24 frequents an area of London which it is very difficult 25 to conduct surveillance in for a number of reasons.</p> <p style="text-align: center;">Page 64</p>

<p>1 People who live in the area and are involved in 2 criminality -- I don't want to taint the entire area, 3 there are some very good people. They don't move very 4 far a lot of the time, they are sort of homing birds and 5 they will stay within a small area. Now to follow 6 someone around that small area is difficult, because you 7 run the risk of, "I have seen that fellow before, I have 8 seen that car before", or you also run the risk of other 9 criminal elements noticing you and making other people 10 aware of it. By doing that, you could compromise the 11 whole operation.</p> <p>12 Q. Is that the reason why he wasn't placed under 13 surveillance between 7 and 11 December?</p> <p>14 A. It would have been one of them.</p> <p>15 Q. Who made that decision?</p> <p>16 A. It would have been me, probably, in conjunction with the 17 SIO. I would never follow anybody who lives in an area 18 and is involved in crime a lot of the time. The best 19 way to put it is like an exposure meter, and obviously 20 you get warmer and warmer and warmer the more you are 21 there and you don't want that, because if you become 22 compromised people can change their plans and if you 23 have intelligence about a plan and all of a sudden that 24 plan changes, you don't have an intelligence feed into 25 that plan, you could lose the whole operation. You can</p> <p style="text-align: center;">Page 65</p>	<p>1 become compromised of it.</p> <p>2 You also run the risk of the officers being 3 compromised and you don't know about it, which means 4 I could deploy an officer in close contact with someone 5 not knowing that the people already know he is there, he 6 could then also go into a shop, an office block, 7 somebody's house, to use it as an observation post, 8 unbeknown to us, criminal elements are aware of who they 9 are, and therefore -- and then there is a follow-on risk 10 to those people.</p> <p>11 Q. Given that you have accepted that the decision on 12 whether or not Ozcan Eren should be made the subject of 13 surveillance was yours to make or that of Mr Murray's 14 decision to make --</p> <p>15 A. Yes.</p> <p>16 Q. -- is what you have just explained, certainly in part at 17 least the reason why he wasn't kept under closer 18 surveillance?</p> <p>19 A. It would certainly form part of the thinking.</p> <p>20 Q. Right, because we now know from cell site of 21 Ozcan Eren's mobile telephone that he was in the 22 vicinity of Woody's when the imitation firearm was 23 purchased on 28 October, don't we?</p> <p>24 A. Yes.</p> <p>25 Q. Right. So he wasn't under surveillance that day?</p> <p style="text-align: center;">Page 66</p>
<p>1 A. No, he wasn't.</p> <p>2 Q. Are you also aware, from evidence which has been 3 provided in witness statement form, that it is suggested 4 that Ozcan Eren dropped off that imitation firearm to 5 Nathan Mason's house on 8 or 9 December?</p> <p>6 A. I was not aware of that evidence, no.</p> <p>7 Q. He wasn't under surveillance on that date either, was 8 he?</p> <p>9 A. No.</p> <p>10 Q. Or those dates.</p> <p>11 Are you aware that it is being suggested that 12 Ozcan Eren met Nathan Mason in a barber's shop on 13 10 December?</p> <p>14 A. Again, I am not aware of that.</p> <p>15 Q. No, but he was not under surveillance on that date 16 either?</p> <p>17 A. No, he wasn't and it is impossible to keep people under 18 constant surveillance. You will expose yourself for the 19 reasons I have said and if that happens, and there is 20 a change -- at the minute, we are aware of a plan and we 21 are putting methods in place to potentially deal with 22 that plan. Now, if we are compromised, and they think 23 they are on us, and they change that plan and we don't 24 know what it is, the whole game is up. So you have to 25 pick and choose, and you will miss things, it is great</p> <p style="text-align: center;">Page 67</p>	<p>1 to be 24/7 surveillance on people, but it is just not 2 feasible all the time.</p> <p>3 Q. Not only were you aware of the critical role that you 4 expected Ozcan Eren to be playing in this plan, because 5 it was his cousin who was the subject, wasn't it, 6 Izzet Eren?</p> <p>7 A. Yes, I believe so it is his cousin, yes.</p> <p>8 Q. You understood that Ozcan Eren was one of those who was 9 setting up the escape plan?</p> <p>10 A. Yes.</p> <p>11 Q. And so likely, perhaps, to be meeting with those who 12 were expected to be occupying the seats of the Audi on 13 the morning?</p> <p>14 A. That is why he was placed under surveillance on a couple 15 of occasions.</p> <p>16 Q. Yes. Had he been under surveillance on the 8, 9 or 17 10 December, he may have been spotted meeting 18 Nathan Mason, either at Nathan Mason's house or at the 19 barbers?</p> <p>20 A. He may have been spotted meeting him --</p> <p>21 Q. Yes.</p> <p>22 A. -- or my team could have been compromised and the whole 23 operation gone, my team could have lost him and in that 24 time we were trying to find him he could have met 25 Nathan Mason. We cannot plan for every eventuality, we</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 just try our best and as I have said to you, it is 2 a very difficult place to do surveillance in. 3 Q. What does conventional surveillance such as this 4 involve? 5 A. As you would imagine it, following somebody around, be 6 it on foot or in vehicles. Keeping them under 7 observation statically. 8 Q. Are there limits on resources? 9 A. Yes, there are. There are limits on the resources of my 10 team and what they are able to do. There are limits on 11 resources of what surveillance teams are available 12 within the MPS, when they are not tasked with live crime 13 in action operations, counter-terrorism operations and 14 any manhunts and anything else they could be tasked 15 with. There are limits to all the resources that we 16 have. 17 Q. Was a limit on resources one of the reasons why 18 Ozcan Eren was not placed under surveillance on 8, 9 and 19 10 December? 20 A. It would have played a part. There were also other 21 demands upon my team at the time that we were dealing 22 with, firearms related matters and threats around that. 23 Q. Right. 24 I would like to go back into the Covert Monitoring 25 Post, please, and ask you about the decision not to</p> <p style="text-align: center;">Page 69</p>	<p>1 appoint a CMP manager. 2 A. Yes, ma'am. 3 Q. What is your justification for not appointing a CMP 4 manager? 5 A. As I have said, I wasn't aware at the time that one 6 needed to be appointed. 7 Q. Do you think in retrospect one should have been 8 appointed? 9 A. As I understand it, that is what the guidance says, one 10 should be pointed, so yes, in retrospect, one should 11 have been. 12 Q. Knowing how things unfolded on the morning of 13 11 December, what is your opinion as to whether or not 14 it would have assisted had a CMP manager been appointed? 15 A. An extra pair of hands in there, yes, would have made it 16 run better. 17 Q. All right. 18 What was your experience of working in a Covert 19 Monitoring Post as at 11 December 2015? 20 A. I previously had been in there as an officer just 21 guarding the integrity of the material. That particular 22 CMP deployment involved foreign conversations, so 23 I wasn't involved noting them down, I was there with the 24 interpreters, they would make relevant notes, the tapes 25 would then come out and I would be responsible for the</p> <p style="text-align: center;">Page 70</p>
<p>1 integrity of the tapes and exhibits and suchlike. 2 Q. When was that? 3 A. That was -- it must have been around 2004, 2005, a long 4 time ago. 5 Q. 10 years before your engagement on this deployment? 6 A. Yes, ma'am, yes. 7 Q. Any other experience? 8 A. Around four years prior to this operation I was involved 9 in, again, I took over a team and a probe had been 10 placed into a vehicle and I took part in live monitoring 11 that probe on occasion. 12 Q. You didn't have any greater experience than those who 13 were listening to the probe on the day? 14 A. No. 15 Q. You have told the inquiry that at some point during the 16 course of the morning you decided to draw back from 17 providing any further intelligence updates to 18 Mr Williams? 19 A. Not intelligence updates -- CMP. 20 Q. CMP updates, you are quite right. 21 A. CMP. 22 Q. Why did you take that decision? 23 A. Because I wanted him to be able to assess what 24 information was coming from where, so when he was 25 updated by FE12 and now DS Reddy, he knew that came from</p> <p style="text-align: center;">Page 71</p>	<p>1 a CMP. When he was updated by me, he was clear where 2 that information was coming from and so he could 3 evaluate it himself. 4 Q. Over the course of the morning, did you make any notes? 5 I am not talking about any time beforehand, but in 6 relation to what you did in the Covert Monitoring Post 7 that morning? 8 A. No, no, I did not. 9 Q. Did you make any notes? 10 A. No. 11 Q. Why not? 12 A. I didn't feel it necessary at the time. 13 Q. Do you still believe that it wasn't necessary? 14 A. I can see how it would be useful now for me to have 15 notes of who I spoke to, what I spoke to them about and 16 what I told them and when I told them, but at the time 17 I believed I had dealt with everything adequately, 18 I didn't see the need at the time to make a note. 19 Q. What time was it when you decided to split off your 20 updates to Mr Williams and to only relate intelligence 21 rather than the Covert Monitoring Post? 22 A. It was very early on, very early on in the deployment. 23 I don't know the exact time. 24 Q. When you updated Mr Williams at 7.42 that someone called 25 Oz is coming to meet them, do you think that was before</p> <p style="text-align: center;">Page 72</p>

<p>1 or after you had --</p> <p>2 A. Did I update him with that or did that come from the</p> <p>3 CMP?</p> <p>4 Q. Let's have a look, please, Mr Coates, if we can go to</p> <p>5 MPS3577, page 18, and can we highlight the entry at --</p> <p>6 that is not what I was expecting to see.</p> <p>7 Could you go back a page, please. I am not even</p> <p>8 sure if this is the correct document.</p> <p>9 MPS3577, page 8, please.</p> <p>10 Thank you.</p> <p>11 Could we highlight the second entry down at 7.42:</p> <p>12 "From CMP FE19: someone called Oz is coming to meet</p> <p>13 them."</p> <p>14 A. Okay.</p> <p>15 Q. That note, do you agree, appears to suggest that at 7.42</p> <p>16 you were providing Mr Williams with information from the</p> <p>17 CMP?</p> <p>18 A. That is what it would suggest, yes.</p> <p>19 Q. Yes, do you remember doing that?</p> <p>20 A. No.</p> <p>21 Q. It must have been a time after 7.42 that you decided not</p> <p>22 to update him from the CMP any further?</p> <p>23 A. Yes, it must have been.</p> <p>24 Q. Right. Yes, thank you.</p> <p>25 Can we take that down, please.</p> <p style="text-align: center;">Page 73</p>	<p>1 Where were you when you became aware that shots had</p> <p>2 been fired?</p> <p>3 A. I couldn't tell you exactly where I was. I would hazard</p> <p>4 a guess, I don't remember moving at all.</p> <p>5 Q. You don't remember moving?</p> <p>6 A. I don't remember -- once I had made the decision not to</p> <p>7 deal with the CMP, I don't remember moving very much</p> <p>8 from the desk I was at. So I was sat at a desk similar</p> <p>9 to this and directly behind me was the TFC and the SIO.</p> <p>10 I am assuming I was sat there when I heard shots were</p> <p>11 fired.</p> <p>12 Q. In the control room?</p> <p>13 A. Yes.</p> <p>14 Q. Right.</p> <p>15 A. In fact I was at that desk, because I remember standing</p> <p>16 up to get people to do other things.</p> <p>17 Q. Once you had made the decision not to update Mr Williams</p> <p>18 from the CMP, did you go back into that room between</p> <p>19 that time and the shots being fired?</p> <p>20 A. I don't think so. I can't remember totally, but I don't</p> <p>21 see why I would.</p> <p>22 Q. Who was providing oversight to the officers in the CMP</p> <p>23 over that period of time when you were in the control</p> <p>24 room?</p> <p>25 A. They would have been looking after themselves, they had</p> <p style="text-align: center;">Page 74</p>
<p>1 been briefed as to what they were doing and I would have</p> <p>2 left them to it. A CMP manager, even if put in place,</p> <p>3 is not there constantly, so if you are running</p> <p>4 a long-running CMP, the CMP manager will not sit in</p> <p>5 there with the CMP.</p> <p>6 Q. We are not talking about a long-running CMP, are we, we</p> <p>7 are talking about a short deployment over the course of</p> <p>8 a number of hours?</p> <p>9 A. I understand that, I am just trying to explain how a CMP</p> <p>10 manager would work.</p> <p>11 Q. So there is every likelihood that, had a CMP manager</p> <p>12 been identified and appointed, that that person would</p> <p>13 have remained in that room providing guidance?</p> <p>14 A. Yes. Yes.</p> <p>15 Q. But that didn't happen?</p> <p>16 A. No.</p> <p>17 MS BLACKWELL: Thank you, sir, that concludes my</p> <p>18 questioning. I don't believe there are any additional</p> <p>19 questions from any other core participants.</p> <p>20 Do you have any questions?</p> <p>21 Question from THE CHAIRMAN</p> <p>22 THE CHAIRMAN: I have just one matter, please.</p> <p>23 You were asked by Ms Blackwell to comment on how the</p> <p>24 covert monitoring team would or should have reacted on</p> <p>25 hearing a conversation which showed clearly that the</p> <p style="text-align: center;">Page 75</p>	<p>1 gang had access a live firearm. You were asked by</p> <p>2 Ms Blackwell, and you indicated that you would have</p> <p>3 expected it to be fed back?</p> <p>4 A. Yes.</p> <p>5 THE CHAIRMAN: Just as the clear information about the</p> <p>6 presence of a live firearm would have been very</p> <p>7 important, do you agree or do you have an opinion to</p> <p>8 offer as to whether clear information about the presence</p> <p>9 of an imitation firearm only would have been important</p> <p>10 to disseminate?</p> <p>11 A. I would have expected that to be disseminated, yes.</p> <p>12 THE CHAIRMAN: And, indeed, if the information to that</p> <p>13 effect came through before 7.42, which was the last time</p> <p>14 at which you were apparently involved in the passing on</p> <p>15 of covert monitoring intelligence to Inspector Williams,</p> <p>16 it would clearly have fallen into that category of</p> <p>17 material, wouldn't it?</p> <p>18 A. It would have been something to update him, but just to</p> <p>19 be clear, although that shows a time of me updating</p> <p>20 Mr Williams, I can't say whether of the other</p> <p>21 officers -- because I was performing my core role, there</p> <p>22 is every possibility that in between me going into see</p> <p>23 the CMP, they could have come out with up-to-date</p> <p>24 information themselves. So just because I gave that</p> <p>25 information at that time, I can't say for certain</p> <p style="text-align: center;">Page 76</p>

<p>1 whether other information came out prior to that from 2 the officers themselves. 3 THE CHAIRMAN: We either know or will know what passed 4 between them and Mr Williams, but clearly that was 5 evidence which fell into the "should be disseminated to 6 the tactical firearms commander" category? 7 A. Like I said, I would expect that to be certainly passed 8 to the tactical firearms commander. As I have said, 9 I received that information and I passed it to him, 10 I would expect them to do the same. What I would like 11 to say is they were told to listen and report what they 12 were hearing, so I would hope everything was coming out. 13 THE CHAIRMAN: Thank you. 14 MS BLACKWELL: Thank you. 15 The next witness is going to be Mr Williams, who is 16 returning to deal with matters that took place on 17 11 December. 18 I understand we need 10 minutes to reconfigure the 19 room. 20 THE CHAIRMAN: Very good, thank you. 21 (11.54 am) 22 (A short adjournment) 23 (12.08 pm) 24 MS BLACKWELL: Sir, Mr Williams has returned to the witness 25 box. There is no need for him to be sworn --</p> <p style="text-align: center;">Page 77</p>	<p>1 THE CHAIRMAN: He is still under oath. 2 MS BLACKWELL: -- he is still under oath. 3 MR NEIL WILLIAMS (recalled) 4 Questions from MS BLACKWELL 5 MS BLACKWELL: Thank you, Mr Williams. 6 I'm going to ask you predominantly today about 7 matters as they occurred on 11 December. 8 A. Yes. 9 Q. But before we do that, I would just like to return to 10 two topics that we touched upon when you were last here 11 at the inquiry. 12 The first is in relation to the FA forms. 13 Mr Turner, since your last visit here, has confirmed 14 that he was the strategic firearms commander in 15 Operation Morguld, and that he provided you with a copy 16 of the FA2 form in that operation in order to assist you 17 in preparing your FA2 form in Operation Ankaa. 18 Can you confirm now that that is what happened, does 19 that help to jog your memory? 20 A. It doesn't jog my memory, I am afraid. I am sorry, but 21 I don't disagree with what was said but I genuinely have 22 no recollection of that. 23 Q. We have obtain the Operation Morguld forms, and I would 24 like you to consider this, that when one performs the 25 exercise of comparing the FA2 form in Operation Morguld</p> <p style="text-align: center;">Page 78</p>
<p>1 and the FA2 form that you completed in Operation Ankaa, 2 there appear to be large sections copy and pasted from 3 one to the other. Does that help you recollect the way 4 in which you went about completing your form? 5 A. I think I explained in my previous occasion here that 6 the way I did it, that I would cut and paste, and then 7 I would review and then make any amendments as 8 necessary. 9 Q. Thank you. 10 I would like to ask you now about the briefing at 11 New Scotland Yard on 10 December. 12 A. Yes. 13 Q. Can you explain to the inquiry the purpose for 14 organising and ensuring that that briefing took place, 15 and who you expected would benefit from attending? 16 A. Yes, so it was something I wanted to do. This operation 17 was different from day-to-day run-of-the-mill operations 18 that -- 19 Q. How so? 20 A. Well, in terms of the number of the deployments, and 21 certainly for SCO7 organised crime syndicates, we were 22 using C3000, which we didn't use as a matter of routine, 23 it was predominantly used by the kidnap unit, so that 24 was new. And obviously it was a multidimensional 25 deployment, in terms of we had three different</p> <p style="text-align: center;">Page 79</p>	<p>1 deployments. 2 Q. Yes. 3 A. So that was different from day-to-day operations, where 4 you have one target, or maybe two targets, and one team 5 conducting the surveillance and maybe one firearms team, 6 but we had multiple teams, lots of people, lots of 7 resources, intelligence coming in from different areas 8 and feeds, and so the operation was different. From my 9 own personal experience, I had been involved in 10 operations of that ilk, earlier in service, where I went 11 along, I was only playing a minor role, I think I was 12 a DC at the time, big operations and that sort of 13 briefing the day before was given, and I came away from 14 that feeling that it was very useful and so that is 15 something I wanted to try and replicate on 10 December. 16 I thought that would be a useful exercise for everyone 17 involved, and I wanted as many people as possible to be 18 there on 10 December, to understand what we were trying 19 to do, why we were trying to do it, and where they sat 20 in it. 21 My team had worked flat out to try and put the 22 resources together, but we are not necessarily experts 23 in surveillance, we are not experts in firearms, other 24 teams and their team leaders would come to that 25 briefing, listen to what we were planning and could go</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 away from that, discuss themselves how they might 2 conduct their own individual roles or they could come to 3 me or any of the other officers involved in the 4 preparation and planning, and say, "We think this would 5 work better" or, "This might cause an issue", so that 6 gave them the opportunity to think about that and we 7 could discuss those contingencies before the operation 8 commenced.</p> <p>9 It was just really also to give a flavour to 10 individual officers -- I might be repeating myself 11 here -- for where they sat individually and 12 collectively. I think, again, experience has taught me 13 that ownership and understanding of an individual role 14 is very important and if you go away from an operation 15 or briefing not knowing why you are there or where you 16 fit in, it is only natural in many regards that you 17 potentially switch off a little bit from what you are 18 expected to do and not feel part of it. And I didn't 19 want anyone to be in that position, because obviously we 20 were all aware, or certainly I was aware as the TFC, of 21 the importance of everyone playing their role to the 22 best of their ability.</p> <p>23 Q. Thank you.</p> <p>24 A. I hope that answered it.</p> <p>25 Q. So it was good practice --</p> <p style="text-align: center;">Page 81</p>	<p>1 A. In my view, yes.</p> <p>2 Q. -- and as well as informing each of the different 3 strands of the operation what they and each other were 4 doing, you were hoping that if part of your operation 5 could be improved upon by any of those factions, that 6 they would bring that knowledge and experience to you?</p> <p>7 A. That's correct, yes.</p> <p>8 Q. Right.</p> <p>9 The inquiry has looked at the attendee list and it 10 has become apparent that other than W80, there was no 11 other firearms officer present, either an AFO or anybody 12 in a more senior position. Were you disappointed by 13 that?</p> <p>14 A. Yes, I was.</p> <p>15 Q. Are you able to assist the inquiry with why that 16 particular part of the operation was significantly 17 absent?</p> <p>18 A. I understood on the day that it was due to either 19 operational commitments or officers weren't on duty, but 20 obviously as I stood up to lead that briefing, obviously 21 I became aware that there wasn't a big attendance from 22 19 and obviously at the conclusion it was confirmed in 23 fact there was only one there, which was a source of 24 disappointment to me.</p> <p>25 Q. But nothing that you could do about it at that stage?</p> <p style="text-align: center;">Page 82</p>
<p>1 A. No.</p> <p>2 Q. No.</p> <p>3 A. No.</p> <p>4 Q. Let's have a look, please, at the transcript of the 5 briefing, because I think as we have already had 6 confirmed, it was audio recorded, wasn't it?</p> <p>7 A. Yes, it was, yes.</p> <p>8 Q. It is IPC315, please, Mr Coates.</p> <p>9 Sir, we have this in our hard copy bundle at 10 page 661, if you want to follow it there.</p> <p>11 THE CHAIRMAN: Thank you.</p> <p>12 MS BLACKWELL: It looks from the beginning as if Mr Kinch 13 says a few words and then you take over and your 14 presentation in this part of the briefing runs to 15 I think a couple of pages, so could I ask you to read 16 out, please, the briefing that you gave on that 17 occasion?</p> <p>18 A. Okay, so Gary has handed over to me and I said: 19 "Thank you very much, Gary. DC Gary Kinch who has 20 done some sterling work over the last few weeks along 21 with the rest of his team. They have been putting this 22 operation plan together. Thank you all for coming along 23 this afternoon, I appreciate it is a little bit off 24 ordinary to have this type of briefing the day before 25 an operation, but I think it is important on this</p> <p style="text-align: center;">Page 83</p>	<p>1 occasion to run through what we plan to do tomorrow. 2 This is an operation, an armed operation, that has been 3 authorised by [obviously it was Craig Turner, who is the 4 SFC] listening in ..."</p> <p>5 So obviously I have acknowledged that he was in the 6 room.</p> <p>7 Q. Yes.</p> <p>8 A. "In response to intelligence that we have received about 9 an intended conspiracy to break free a very dangerous 10 man en route to prison tomorrow. That is the overview 11 of it. Gary is going to go through things in a bit more 12 detail in a moment. But coming back to my point 13 a minute ago, [I think it should read 'I take the view'] 14 that is very important we get everybody together today, 15 because this operation is being run really with four 16 separate strands, all of which are interlinked. It is 17 very important that everyone knows where each strand 18 sits in the overall operation objectives and not only 19 just in terms of which different units sit where, but 20 also individually it is very important people know as 21 individuals what their roles and responsibilities are, 22 where they sit in the great scheme of things, it just 23 gives everyone that little bit more ownership of it and 24 I think will make people perform a bit better. It is no 25 doubt that we as a group have to be on our A game</p> <p style="text-align: center;">Page 84</p>

<p>1 tomorrow in relation to this operation. So that is the 2 reason why I have asked you all here today. Also, you 3 will go away, I know everyone is not here, for example 4 we have not got all surveillance operatives here or all 5 the firearms operatives here, because obviously they are 6 out doing their day-to-day responsibilities, but we have 7 representatives from all the units here, go away, speak 8 with their colleagues and team members and no doubt 9 there will be people coming up with ideas of things 10 maybe we haven't thought of, we thought of nearly, and 11 we think ..."</p> <p>12 Sorry:</p> <p>13 "We think we thought of as much as we can do but 14 there will always be something that will be worth 15 mentioning, there will always be some question that 16 someone will need answering that we can answer that may 17 not have been brought for our attention.</p> <p>18 "So that is the reason why I have asked everyone to 19 come in this afternoon. We are mounting this operation, 20 it is an audacious attempt by the conspirators to spring 21 this gentleman from the prison van, but we think we can 22 safely control that and manage the risk, it is all about 23 from our point of view dealing with the long-term threat 24 to the people of north-east London. The individual, as 25 I said earlier, is a dangerous individual, his</p> <p style="text-align: center;">Page 85</p>	<p>1 associates are dangerous individuals and we believe by 2 removing these threats we can make a long-term impact. 3 There are some tensions between rival Turkish groups in 4 north-east London, the people coming together to carry 5 out this offence tomorrow will be dangerous individuals. 6 We have got a great opportunity to remove that threat 7 from the streets of London in the long term, so this is 8 why we are doing the operation. I will say no more 9 about this at this moment in time, however Gary just to 10 run through the intelligence and what we intend to do 11 tomorrow, then I will come back at the end and we will 12 be open for questions as well.</p> <p>13 "Just one point I forgot to mention, this is -- [it 14 should be 'this briefing'] has been recorded, audio 15 recorded ..."</p> <p>16 Q. Yes.</p> <p>17 A. "... the reason for that is all about transparency and 18 openness and accountability while we are doing things, 19 so be aware of that. In terms of any sensitivities and 20 particular methods that we use, we don't wish to 21 discuss, we can discuss out of here, outside of the room 22 but please be as open as you feel you can be. If you 23 have any questions [cough] I will hand over to 24 Gary Kinch."</p> <p>25 Q. That was you introducing to everybody there what the</p> <p style="text-align: center;">Page 86</p>
<p>1 plan was, the intelligence that you had received and why 2 you had taken the decision to allow the conspiracy to 3 run and to invite those present to become involved in 4 what was going to take place the following day?</p> <p>5 A. That's correct, yes.</p> <p>6 Q. There then followed a briefing from Gary Kinch and 7 during that course of events, he set out the 8 intelligence as was known at that time, including 9 addresses that were known to be associated in particular 10 with the Erens, vehicles that were known to be 11 associated with Ozcan Eren and other aspects of the 12 intelligence. Then, if we go to page 6, please, we can 13 see that you take over, again, for a short period.</p> <p>14 Could I ask you, please, to read through your part 15 again, Mr Williams?</p> <p>16 A. Certainly.</p> <p>17 Q. Thank you.</p> <p>18 A. "Thank you, Gary. As I said at the beginning it is all 19 about managing long-term risks. But obviously in terms 20 of what we are seeking to achieve tomorrow, first and 21 foremost priority is the safe delivery of the subject 22 Izzet Eren from Wormwood Scrubs prison to Wood Green 23 Crown Court, alongside making sure the safety of the 24 members of the public throughout the course of the 25 operation is paramount. We have got good intelligence</p> <p style="text-align: center;">Page 87</p>	<p>1 control around these subjects, obviously we have got 2 a lot of assets out tomorrow in terms of surveillance 3 and we have heard about firearms team, good intelligence 4 support, if at any stage throughout the course of the 5 operation tomorrow I feel as TFC we are losing 6 sufficient control to ensure the safety of everyone, 7 then we will be looking to go from a covert response to 8 an overt response. To make sure that prisoner gets from 9 A to B without any incident and no one is put under 10 undue risk. So that is the overall objective of what we 11 are trying to do. Hopefully in an ideal world we will 12 maintain control and we will arrest some very dangerous 13 individuals for very serious offences and remove the 14 threat they pose to London in the long term. But the 15 caveat, as I said, is that I have sufficient control as 16 the TFC, I will be at C3000, which is a little bit 17 different to normal operations that I will be sort of 18 an overarching TFC and I will have access to all the 19 surveillance channels coming into me and I will have 20 access to the intelligence feeds coming to me and 21 everything that 3000 can offer to assist in my decision 22 making. Obviously I've got two TFCs out on the ground. 23 I've got FE17, who has kindly agreed to help us, going 24 to be the TFC in charge of the prison van, team Alpha, 25 and FE1 from the projects team SCO7, who is not here at</p> <p style="text-align: center;">Page 88</p>

22 (Pages 85 to 88)

<p>1 this moment."</p> <p>2 Q. Next page, please, Mr Coates, thank you.</p> <p>3 A. "... but I briefed her this morning, she will be the TFC</p> <p>4 on the Audi. Although I will have the overarching</p> <p>5 responsibility, they will have responsibility should</p> <p>6 anything spontaneously happen, they will have primacy</p> <p>7 then for making decisions around how the armed response</p> <p>8 is to anything that spontaneously occurs. Once</p> <p>9 satisfied I am myself we have got sufficiency of</p> <p>10 evidence or intelligence to effect an interception, then</p> <p>11 obviously I will be communicating that to either FE17 or</p> <p>12 FE1 as appropriate and letting them deal with that, with</p> <p>13 the (inaudible) of both teams accordingly. In terms of</p> <p>14 the surveillance on the prison van, that will be covert</p> <p>15 initially when it leaves Wormwood Scrubs. We have got</p> <p>16 the option of going overt should at any stage, as I say,</p> <p>17 I feel that we have got insufficient control. And we</p> <p>18 also have got on standby overt ARVs who will be deployed</p> <p>19 if it comes to outside Wood Green Crown Court as</p> <p>20 a deterrent to anyone who may be considering storming</p> <p>21 the court. All those contingencies are in place and</p> <p>22 hopefully will not be needed and we will have the result</p> <p>23 that we want. We have good intelligence, good evidence</p> <p>24 that these individuals come together in this vehicle,</p> <p>25 good control, and we will take them out along long, long</p> <p style="text-align: center;">Page 89</p>	<p>1 before the van gets anywhere near the Crown Court. The</p> <p>2 overarching objective is that that car, and any other</p> <p>3 mission car that these subjects may have, does not come</p> <p>4 anywhere near that prison van."</p> <p>5 Q. Thank you, there then followed a series of short</p> <p>6 questions, and that completed the briefing.</p> <p>7 Can we take that down and I would just like to look,</p> <p>8 please, before we leave this topic, at COP18, which is</p> <p>9 the APP guidance in relation to briefings. Can we go,</p> <p>10 please, Mr Coates, to page 13.</p> <p>11 Right. Could we go over to page 14. Right.</p> <p>12 This is the advice about briefings:</p> <p>13 "The briefing should outline the intended course of</p> <p>14 action and incorporate a range of contingencies. These</p> <p>15 should provide officers with as much clarity as possible</p> <p>16 for the role that they may have to undertake and any</p> <p>17 tactical parameters which have been set. The tactical</p> <p>18 firearms commander should ensure that information,</p> <p>19 intelligence and detail of reliability is included in</p> <p>20 the briefing where it is relevant to the working</p> <p>21 strategy. The national intelligence model provides</p> <p>22 guidance on how commanders can assess the reliability</p> <p>23 and strength of intelligence. Where time permits</p> <p>24 briefing should inform officers of the procedures to be</p> <p>25 followed at the conclusion of the event to which they</p> <p style="text-align: center;">Page 90</p>
<p>1 have been deployed. This should include the procedures</p> <p>2 to adopt in respect of prisoner handling, scene</p> <p>3 preservation, evidence collection and return to</p> <p>4 a location where post-deployment procedures will be</p> <p>5 undertaken. These may range from officers making notes</p> <p>6 and completing records through to structured debriefing</p> <p>7 as well as attending to organisational and welfare</p> <p>8 issues. See post deployment. Officers conducting</p> <p>9 briefings should be mindful that the content of the</p> <p>10 briefing may directly affect the response of armed</p> <p>11 officers to any subsequent perceived threat from</p> <p>12 a subject."</p> <p>13 I appreciate that certainly in relation to the</p> <p>14 directions that would be given about post-incident</p> <p>15 procedures, this was not the time for doing that, was</p> <p>16 it? That was expected to take place the following</p> <p>17 morning at the 5.00 am briefings?</p> <p>18 A. That would be correct, yes.</p> <p>19 Q. In terms of the first paragraph that I outlined, would</p> <p>20 you confirm, please, Mr Williams, that the briefing that</p> <p>21 you gave, together with the information and intelligence</p> <p>22 provided by Mr Kinch, on 10 December, was intended to</p> <p>23 set out the course of action that you were intending to</p> <p>24 take. It contained also a reference to a range of</p> <p>25 contingencies, you talk about, certainly so far as the</p> <p style="text-align: center;">Page 91</p>	<p>1 prison van is concerned, going from covert to overt, if</p> <p>2 necessary. It didn't necessarily deal with clarity of</p> <p>3 roles, but I expect that you would say that that was</p> <p>4 intended to come at the 5.00 am briefings the following</p> <p>5 day?</p> <p>6 A. That would be correct, yes.</p> <p>7 Q. In terms of tactical parameters, would you say that what</p> <p>8 you presented on 10 December touched upon the tactical</p> <p>9 parameters that you had in place or were expected to be</p> <p>10 in place the following day?</p> <p>11 A. I would say did touch on them, yes.</p> <p>12 Q. All right.</p> <p>13 The reason why this briefing did not contain all of</p> <p>14 the aspects of what we see set out here by way of APP</p> <p>15 guidance was because it was always intended to follow</p> <p>16 this up with the individual briefings for each area of</p> <p>17 the deployment the following morning?</p> <p>18 A. That's correct, yes.</p> <p>19 Q. Thank you.</p> <p>20 Can we take that down and look for a moment, please</p> <p>21 at a comment that you made in one of your witness</p> <p>22 statements, it is MPS71, this is behind our tab 2, in</p> <p>23 our hard copy bundle.</p> <p>24 Could we go to page 9, please.</p> <p>25 It is the sentence in the middle of the page,</p> <p style="text-align: center;">Page 92</p>

1 please, "During the evening of 10 December ..." Could
 2 we highlight that, please?
 3 This statement, let's just remind ourselves, was
 4 made on 16 December 2015, so a matter of days after the
 5 incident?
 6 **A. That's correct.**
 7 Q. You said:
 8 "During the evening of 10 December, I received
 9 an intelligence update to indicate that the attempt to
 10 free Izzet Eren was still planned for the following
 11 day."
 12 Just reflecting on that for a moment, Mr Williams,
 13 is that accurate in terms of when you received
 14 an intelligence update?
 15 **A. Yes, that is accurate, yes.**
 16 Q. Right. Following receipt of that information, did you
 17 do anything?
 18 **A. No. I didn't do anything.**
 19 Q. Were you on duty when you received that update?
 20 **A. No, I was at home.**
 21 Q. Pardon?
 22 **A. I was at home.**
 23 Q. You were at home?
 24 **A. Yes.**
 25 Q. Right. Did that intelligence update cause you to speak

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1 **A. That's correct, yes.**
 2 Q. Right.
 3 Do you think you should have made a note of it?
 4 **A. No, I didn't think I did need to make a note of that.**
 5 Q. Right, okay.
 6 Let's move then -- in fact, before we leave this
 7 document, could I just ask you, Mr Coates, to highlight
 8 the following paragraph that deals with the command
 9 structure, up to and including where we see "(team
 10 Bravo)".
 11 No, just take that down, please, if you go from the
 12 word, "The command structure".
 13 There we are, that is fine, great, thank you.
 14 Here you set out the command structure for the
 15 following day and we have heard evidence in your absence
 16 about the roles that you set out there and who was
 17 fulfilling them, and it is in accordance with what you
 18 set out in your witness statement, you say:
 19 "Tactical adviser A48 ..."
 20 I think that should be S48?
 21 **A. That's correct, yes.**
 22 Q. "... who was co-located with me in C3000, further advice
 23 was available to those ground assigned by respective SFO
 24 OFCs on each of the surveillance teams, recorded
 25 firearms briefings were held at around 5.00 am at

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1 to anybody else or to put anything in train?
 2 **A. No, there was no requirement to do anything.**
 3 Q. I am not suggesting that there was, I just want to
 4 confirm whether or not anything happened overnight with
 5 you.
 6 **A. No.**
 7 Q. Did you make a note of that intelligence that was
 8 received overnight?
 9 **A. No, I didn't. Well, on the evening of the 10th, no,
 10 I didn't make a note of that.**
 11 Q. Did you make a note at any time of what was received by
 12 you overnight?
 13 **A. Well, I didn't -- I received that piece of intelligence
 14 from memory, that was mid evening. I didn't receive any
 15 other intelligence overnight until the following
 16 morning.**
 17 Q. Until the following morning?
 18 **A. That's correct, and I did make obviously notes, because
 19 the operation was running at that stage --**
 20 Q. That's right.
 21 **A. -- and I clearly remember that phone call and I clearly
 22 remember the contents of it.**
 23 Q. Right, okay.
 24 This was received mid evening, when you were at
 25 home, off duty?

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1 Alperton traffic garage (team Alpha) and Quicksilver
 2 Patrol Base in Wood Green (team Bravo). Team Charlie,
 3 focusing on Ozcan Eren was briefed at Holborn and
 4 I conducted a briefing for all staff at C3000 that
 5 morning. I positioned myself in the main control room
 6 with my tactical adviser and from where I could be
 7 directly briefed from the three surveillance deployments
 8 by a surveillance coordinator. There were two further
 9 side offices, one of which contained our intelligence
 10 support cell and one contained the live audio feed from
 11 the Audi which had been successfully deployed."
 12 Thank you.
 13 It was always your intention to be at the control
 14 room C3000 during the course of the deployment, wasn't
 15 it?
 16 **A. That's correct, yes.**
 17 Q. Was it always your intention to provide the briefing to
 18 those present that morning?
 19 **A. At 3000?**
 20 Q. At 3000.
 21 **A. Yes, it was.**
 22 Q. Right.
 23 That briefing was not recorded, was it?
 24 **A. It wasn't recorded.**
 25 Q. Should it have been recorded?

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<p>1 A. It wasn't a firearms briefing, so there was no 2 requirement for it to be recorded and I took the view 3 that there was no need for it to be recorded. 4 Q. Right. 5 In hindsight, do you think it would have assisted 6 had it been recorded? 7 A. Most certainly it would have assisted, with hindsight, 8 yes. 9 Q. Did you give any thought, actually, on the morning, as 10 to whether or not it should be recorded or, because it 11 was not a firearms briefing, did you automatically 12 assume that you didn't need to? 13 A. It was probably the latter. 14 Q. All right. 15 Thank you. 16 You touch upon the ground-assigned OFCs in the 17 passage that we have just read out. How were you to be 18 in contact with those who were performing that role? 19 A. Well, the -- by two means really, it would probably be 20 telephone contact with the respective TFCs on the 21 ground, who would be with the OFCs. 22 Q. Yes. 23 A. And there was also the option of communication through 24 my tactical adviser to the OFCs, either asking him to 25 pass something by telephone or obviously we had the</p> <p style="text-align: center;">Page 97</p>	<p>1 option of using radio communication as well. 2 So that is probably three ways. 3 Q. Thank you. 4 The inquiry has heard from S48, who himself 5 confirmed that there was a certain amount of contact 6 between him and FE1, Keely Smith, and also the other 7 ground OFC, and the -- sorry, and the ground TFCs and 8 the OFCs. 9 A. Yes. 10 Q. Were you content that he, as tactical adviser, was in 11 direct contact with those performing those roles? 12 A. Yes, I was content with that, yes. 13 I mean I have been in that position many, many times 14 myself, as a ground-assigned TFC, when C3000 has been 15 running, primarily on kidnap investigations. 16 Q. Yes. 17 A. And it can actually be quite a lonely experience, 18 because on a conventional TFC role, you may be just 19 following one set of -- one car, maybe to do a bank 20 robbery or something like that, all the intelligence 21 comes to you, you are aware of everything that is going 22 on and you can make the decisions. 23 In an operation like a kidnap investigation, you 24 have the SIO in the control room and you outside as the 25 ground TFC and sometimes you do not feel included in</p> <p style="text-align: center;">Page 98</p>
<p>1 everything that is going on, and you feel a little bit 2 blinded and, as I said earlier, that be quite a lonely 3 and disconcerting situation because you ultimately are 4 the TFC on the ground in charge of the deployment and 5 the nature of any interception or intervention that you 6 are asked to perform from the control room ... 7 So, in answer to your question, yes I was content 8 for that because I have been on the other end of it and 9 I know it is very important for that communication 10 channel to be open. 11 Q. When that happened, did S48 discuss with you the content 12 of the conversations that he had had with those on the 13 ground? 14 A. No, he didn't. It was just an ongoing evolving process 15 as the operation evolved. 16 Q. I would like to ask you some questions now about 17 Mr Turner's role that morning. 18 The inquiry has heard that he, together with 19 Mr Gilmour, was/were present in the control room for 20 part of the time. 21 A. Yes. 22 Q. What sort of contact did you have with Mr Turner over 23 the course of the morning, was it close contact or 24 something else? 25 A. It was quite a brief contact. I couldn't tell you when</p> <p style="text-align: center;">Page 99</p>	<p>1 they came into the control room, I couldn't tell you 2 when they left or how long they were there. I do 3 remember seeing him there, I remember obviously 4 acknowledging them, but obviously I was busy running the 5 operation. 6 Q. Yes. 7 A. And other than acknowledgment that they were there, 8 there was no detailed conversation about how things were 9 going. 10 Q. Right, well, in fact, you deal with this in part of the 11 witness statement that we currently have on screen, and 12 I am going to read from the fifth line down: 13 "I was in communication with both TFCs on the ground 14 by phone and their respective SIO/OFCs were also in 15 radio and telephone contact with the tactical adviser." 16 We have just dealt with that. 17 You go on to say: 18 "FE14 and FE15 [that is Mr Gilmour and Mr Turner] 19 were not present throughout but did join me in C3000 20 during the course of the morning to enquire how events 21 were developing and observe from the rear. Neither 22 played any part in my tactical decision making." 23 Were you content that you had sufficient access to 24 Mr Turner that morning? 25 A. Oh yes, I was absolutely content. I am just trying to</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 think -- his office was either one floor or two floors</p> <p>2 directly below me and obviously I had telephone contact</p> <p>3 with him as well, so ...</p> <p>4 Q. If he hadn't been physically present and you needed to</p> <p>5 get in conduct with him, it wouldn't have been at all</p> <p>6 difficult?</p> <p>7 A. It wouldn't have been a problem. It wouldn't have been</p> <p>8 a problem.</p> <p>9 Q. Is that right, that neither FE14 or FE15 had played any</p> <p>10 part in your tactical decision making?</p> <p>11 A. Not on the day, they had played no part in it.</p> <p>12 Q. Did you expect them to take any part in that?</p> <p>13 A. No, that is not their role.</p> <p>14 Q. Yes.</p> <p>15 A. And obviously FE15 was just shadowing in any event,</p> <p>16 so -- but it was not Mr Turner's role to involve himself</p> <p>17 in the tactical delivery of the operation.</p> <p>18 Q. Looking back, and doing the best you can, how often over</p> <p>19 the course of that morning, do you think you spoke to</p> <p>20 Mr Turner?</p> <p>21 A. I think, from memory, it was just once.</p> <p>22 Q. And --</p> <p>23 A. Well, up until obviously the events that unfolded,</p> <p>24 unfolded.</p> <p>25 Q. Sorry, I interrupted you.</p> <p style="text-align: center;">Page 101</p>	<p>1 A. Sorry, I was just clarifying, after that I spoke to him</p> <p>2 quite a lot.</p> <p>3 Q. Right, of course.</p> <p>4 Can you remember the purpose of your contacting him</p> <p>5 on that one occasion prior to the shots being fired?</p> <p>6 A. Sorry, I may have slightly misled you there. We had one</p> <p>7 conversation and that was in the control room, and</p> <p>8 I didn't make any phone calls to him during the course</p> <p>9 of the operation.</p> <p>10 Q. What was your discussion at that time?</p> <p>11 A. I think it was just an acknowledgment that he was there.</p> <p>12 I think he may have said something to me like,</p> <p>13 "Everything okay?" And I have said yes and that was it,</p> <p>14 he let me get on with what I was doing and, and I didn't</p> <p>15 feel that I needed to update him with everything that</p> <p>16 was going on at the time.</p> <p>17 Q. Thank you.</p> <p>18 Let's return to your witness statement again, and</p> <p>19 I am three lines up from the bottom now:</p> <p>20 "That morning, I reapplied the rationale for the</p> <p>21 deployment of firearms in conjunction with the national</p> <p>22 decision model and was satisfied that it remained valid.</p> <p>23 "There was still insufficient intelligence or</p> <p>24 evidence to allow any effective or sustainable action to</p> <p>25 remove or permanently disrupt this conspiracy without</p> <p style="text-align: center;">Page 102</p>
<p>1 the need for a firearms deployment."</p> <p>2 How did you reapply the national decision model, at</p> <p>3 that time?</p> <p>4 A. Really this is an extension of an ongoing consideration</p> <p>5 process that we all had, certainly on the command and</p> <p>6 planning of the operation, dating back to the original</p> <p>7 meeting on 10 November. Obviously we were trying to</p> <p>8 deliver sustained public protection to the people of</p> <p>9 London and could we do that as safely as possible. And</p> <p>10 obviously in coming to that decision, we had moved</p> <p>11 forward to the point of operational deployment, but that</p> <p>12 was an ongoing consideration, and, as we sat there, or</p> <p>13 I sat there on the morning of 11 December, I had to</p> <p>14 reapply the national decision model and to review -- as</p> <p>15 I have written there:</p> <p>16 "Was there any opportunity that would allow any</p> <p>17 effective or sustainable action to remove or permanently</p> <p>18 disrupt the conspiracy without the need for a firearms</p> <p>19 deployment?"</p> <p>20 Q. What time did you perform that exercise?</p> <p>21 A. Probably around 5.00 am or just after the briefing.</p> <p>22 Q. Just after the briefing?</p> <p>23 A. Probably, yes.</p> <p>24 Q. We touched upon this last time you were present at the</p> <p>25 inquiry, and I think I asked you whether or not you</p> <p style="text-align: center;">Page 103</p>	<p>1 would sit with any copy of the chart that we are now</p> <p>2 familiar with in terms of the national decision model</p> <p>3 and you would work through it or was it something that</p> <p>4 you just had in your mind?</p> <p>5 A. I had it in my mind. I think it actually appears in</p> <p>6 some of the firearms documents, I think the FA5 for</p> <p>7 example, which I would have had with me, my tactical</p> <p>8 advice, and it sits in there.</p> <p>9 Q. Do you remember on this occasion whether or not you had</p> <p>10 the flowchart in front of you?</p> <p>11 A. I don't remember, I couldn't confirm.</p> <p>12 Q. All right.</p> <p>13 Let's deal for a moment with the briefing. How many</p> <p>14 people were present?</p> <p>15 A. I couldn't confirm how many people were present. It was</p> <p>16 my understanding my officers had a note of everyone that</p> <p>17 would be there. I would imagine in the region of 15 to</p> <p>18 20 people.</p> <p>19 Q. Including those who were to be working in the Covert</p> <p>20 Monitoring Post?</p> <p>21 A. That's correct, yes.</p> <p>22 Q. You presented the briefing?</p> <p>23 A. I did, yes.</p> <p>24 Q. Did anybody else assist?</p> <p>25 A. From memory, there was no other input other than mine.</p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

1 Q. Right, how long did it last?

2 **A. 10 to 15 minutes.**

3 Q. Was there any document to which you referred during the

4 course of the briefing?

5 **A. Yes, there was a briefing sheet, which was deployed on**

6 **the screen. And that was a continually evolving**

7 **document throughout the course of the morning.**

8 Q. Is that the PowerPoint that we have seen?

9 **A. The PowerPoint, yes.**

10 Q. With the photographs of some of the --

11 **A. Some of the subjects, yes.**

12 Q. -- alleged conspirators, yes.

13 **A. And I imagine -- I can't confirm from memory -- that**

14 **there were hard copies that were also available possibly**

15 **during the course of that briefing. I am not**

16 **100 per cent on that, but that would normally be the**

17 **case.**

18 **So, yes, I went through essentially that briefing,**

19 **obviously the overall operation, largely mirroring what**

20 **I said on the 10th.**

21 Q. Right.

22 **A. Then basically I -- from memory, the layout of 3000 was**

23 **a bank of desks in a sort of rectangular shape, three**

24 **sided, and I was at one side and everyone who was**

25 **involved sat round the other three sides of the**

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1 **rectangle or square, other people, for example the**

2 **intelligence staff, the staff in 3000 were stood or**

3 **maybe sat at other chairs, and then I went round**

4 **everybody --**

5 **Sorry, sir, are you okay?**

6 THE CHAIRMAN: Yes, thank you.

7 **A. And then I went round the room asking everybody there to**

8 **introduce themselves and explain who they were and what**

9 **their role was:**

10 THE CHAIRMAN: Excuse me.

11 MS BLACKWELL: Just pause.

12 THE CHAIRMAN: My apologies.

13 MS BLACKWELL: Not at all, sir.

14 **A. Then at the conclusion, obviously, I asked if there were**

15 **any questions, which is something I do as a matter of**

16 **course at the end of the briefing and then I invited**

17 **everyone to go away, make sure their kit and equipment**

18 **was working and the radio communications obviously was**

19 **key, and that was it in terms of the briefing.**

20 Q. Right.

21 You mentioned during the course of that answer that

22 you based in part, at least, what you were providing in

23 this briefing on what you had given the day before?

24 **A. That's correct, yes.**

25 Q. Did you have a script or any notes that you were

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1 referring to?

2 **A. From memory, no. From memory, no.**

3 Q. Right.

4 **A. If I was delivering the briefings that were taking place**

5 **in north London or west London, then I used the**

6 **preprepared script which I used for all my firearms**

7 **operations -- it just flowed naturally from the way**

8 **I wanted to deliver it, but this was slightly outside of**

9 **that remit and it was just done freestyle really.**

10 Q. All right.

11 Had you spoken to those who were presenting the

12 briefings at the other locations about what was

13 important for them to mention during the course of their

14 address?

15 **A. Certainly I had spoken to both the tactical firearms**

16 **commanders and I had updated them in relation to that,**

17 **particularly in relation to the threat and the**

18 **intelligence in relation to firearms as we knew it at**

19 **that stage, ie 5.00 am on 11 December.**

20 **In terms of the intelligence picture that the**

21 **relevant intelligence officers gave, I don't believe**

22 **I spoke to them, but then again I had confidence in**

23 **their ability to deliver the intelligence and the same**

24 **with the unarmed deployment that Mr Yeardsley conducted,**

25 **led for me.**

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1 Q. Was it important to you that all of the officers at each

2 of the three briefings received the same information?

3 **A. Yes, it would have been important. But we had**

4 **a consistent briefing note and we had the consistent FA2**

5 **forms, which obviously the TFCs would base their input**

6 **on the -- sorry, on the FA forms.**

7 Q. Yes, so that gave you confidence that --

8 **A. That gave me confidence that there would be consistency**

9 **across the board, yes.**

10 Q. Right.

11 We know that your briefing was not recorded and you

12 have explained the reasons for that. Did you make

13 a note of what was said during the course of the

14 briefing or did anybody make a note of what was said?

15 **A. Individual people may have made notes. I can't assist**

16 **with that, I am afraid.**

17 Q. You didn't make a note?

18 **A. I didn't make a note, no.**

19 Q. Were you confident that everybody who should have been

20 there was there?

21 **A. At the time I was confident, yes, everyone was there**

22 **that should have been there.**

23 Q. All right.

24 For instance, we have noted that on the previous

25 day's briefing there was an attendees list that was

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<p>1 compiled. Was the same done here?</p> <p>2 A. No, on this occasion, I didn't ask -- as I recall,</p> <p>3 I didn't ask for an attendees list to be compiled.</p> <p>4 I was confident that my staff had arranged all the</p> <p>5 resources there and they would have a record of who</p> <p>6 would be there.</p> <p>7 Q. Thank you.</p> <p>8 Just thinking back to the APP guidance that we</p> <p>9 looked at a few moments ago, were you confident that</p> <p>10 your briefing this morning, at 5.00 am, included the</p> <p>11 intended course of action in terms of the operation?</p> <p>12 A. Yes, I was confident, yes.</p> <p>13 Q. And the contingencies that you had in mind?</p> <p>14 A. Yes, I was confident, as it affected the role in C3000,</p> <p>15 yes.</p> <p>16 Q. And the clarity of roles for those present?</p> <p>17 A. Yes.</p> <p>18 Q. And the tactical parameters that you had in mind?</p> <p>19 A. Yes, I mean I think tactical parameters wouldn't</p> <p>20 necessarily feature within C3000, but in broad terms</p> <p>21 I believe they would have been covered, yes.</p> <p>22 Q. Did you deal for instance with tipping points?</p> <p>23 A. Not specifically I don't believe.</p> <p>24 Q. What was the reason for not addressing those present</p> <p>25 about tipping points?</p> <p style="text-align: center;">Page 109</p>	<p>1 A. I just felt that that was probably more akin to the</p> <p>2 briefings at Alperton and Lincoln Road. I may have</p> <p>3 mentioned -- I may have mentioned, I would have had in</p> <p>4 mind a potential cutoff point for when I would ask for</p> <p>5 either overt action ... sorry, an overt deployment on</p> <p>6 the van to take place or I would give a direction to</p> <p>7 move in and arrest and detain the -- any conspirators.</p> <p>8 But I may have mentioned that, but I can't recall.</p> <p>9 Q. Right. We know from your evidence previously provided</p> <p>10 to the inquiry that there were evidential tipping points</p> <p>11 and also geographical tipping points?</p> <p>12 A. That's correct, yes.</p> <p>13 Q. The geographical tipping points being the arrival of the</p> <p>14 prison van off the A1 and onto the A406, and also the</p> <p>15 prospect of the Audi vehicle, the mission vehicle,</p> <p>16 getting close to the prison van at any stage?</p> <p>17 A. Yes, I think I may have -- the geographical tipping</p> <p>18 points would be more relevant to C3000, so I may well</p> <p>19 have made reference to those.</p> <p>20 Q. It may seem like an obvious question, but why do you say</p> <p>21 that? That the geographical tipping points were more</p> <p>22 relevant to those in that room?</p> <p>23 A. Because obviously I've got surveillance monitors in</p> <p>24 there, liaising with the relevant surveillance teams, so</p> <p>25 that would be something that could potentially be of</p> <p style="text-align: center;">Page 110</p>
<p>1 relevance to them.</p> <p>2 Q. Would it also have been important for those officers</p> <p>3 manning the Covert Monitoring Post to be aware of the</p> <p>4 danger if they overheard that the Audi from the</p> <p>5 conversation taking place within the vehicle, was</p> <p>6 getting close to the prison van?</p> <p>7 A. I don't believe that they needed to know that. We</p> <p>8 obviously had a technical control on the Audi and we had</p> <p>9 physical control on the prison van.</p> <p>10 So that was really a matter for the two surveillance</p> <p>11 deployments and respective vehicles.</p> <p>12 And also at that time, 5.00 on Friday, 11 December,</p> <p>13 we did not know in what capacity the Audi was going to</p> <p>14 be used.</p> <p>15 Q. Yes.</p> <p>16 A. (a) it might not have been used at all and if it was</p> <p>17 used, it may not have been used as a primary mission</p> <p>18 vehicle, it could have been used as a lookout vehicle,</p> <p>19 it could have been used as a changeover vehicle or it</p> <p>20 could have been used as a command and control vehicle.</p> <p>21 So for those reasons, in addition, it probably</p> <p>22 wouldn't have been worth mentioning that to the people</p> <p>23 in the CMP.</p> <p>24 Q. Did the officers manning the CMP understand, do you</p> <p>25 think, that should they overhear conversation about</p> <p style="text-align: center;">Page 111</p>	<p>1 firearms, that that was something which they should</p> <p>2 immediately bring to your attention?</p> <p>3 A. Yes, so -- I mean at the end of the briefing, I went</p> <p>4 round, obviously officers had introduced themselves and</p> <p>5 at the end of the briefing, I had some administrative</p> <p>6 functions to do myself. You have to ring up to get</p> <p>7 an armed operation number, get the operation registered</p> <p>8 on the computer aided dispatch system ...</p> <p>9 So once I had done that, I then went round and spoke</p> <p>10 to everyone individually and I went into the Covert</p> <p>11 Monitoring Post to speak to the officers there.</p> <p>12 Q. Could I just ask you to pause, please.</p> <p>13 A. Yes.</p> <p>14 Q. What time do you think that was?</p> <p>15 A. That was between 5 -- probably between 5.30 and the --</p> <p>16 and when the vehicle moved, which was just after 6.30,</p> <p>17 wasn't it, and as I am answering that question, it was</p> <p>18 probably more towards 6.30.</p> <p>19 Q. Right.</p> <p>20 A. More towards 6.30, but I don't know the specific --</p> <p>21 Q. What did you do when you went into the room?</p> <p>22 A. So I went in there and I spoke to everyone there, made</p> <p>23 sure everyone was okay. I think it was also gave me</p> <p>24 an opportunity to speak to the two Turkish speaking</p> <p>25 officers that we had there.</p> <p style="text-align: center;">Page 112</p>

<p>1 Q. Yes.</p> <p>2 A. Who were not part of our team, and I think that always</p> <p>3 can be a little bit of an issue, that people don't feel</p> <p>4 part of the team, so you want to make sure (a) that they</p> <p>5 felt welcome, they felt comfortable in their roles, they</p> <p>6 understood what they were meant to be doing and that</p> <p>7 they had any questions for me.</p> <p>8 And also I was making sure that everyone understood</p> <p>9 what I wanted from the Covert Monitoring Post, which was</p> <p>10 basically I wanted to be updated on anything and</p> <p>11 everything -- anything and everything. Unless it was</p> <p>12 clearly obviously not related, so, for example, if they</p> <p>13 are talking about what they were watching on television</p> <p>14 the night before, I didn't need to know but anything and</p> <p>15 everything else, and obviously that would include</p> <p>16 firearms.</p> <p>17 Q. Right.</p> <p>18 Did you give them any further instruction other</p> <p>19 than, as you have just told the inquiry, update me on</p> <p>20 anything and everything relevant, including firearms?</p> <p>21 A. I probably also would have said, if you have got any</p> <p>22 doubts whether it is relevant, tell me.</p> <p>23 Q. Right.</p> <p>24 A. So --</p> <p>25 Q. They of course had been present at the briefing that you</p> <p style="text-align: center;">Page 113</p>	<p>1 had just given at 5.00?</p> <p>2 A. That's correct, yes.</p> <p>3 Q. Some of them I think had also been present at the</p> <p>4 New Scotland Yard briefing the day before?</p> <p>5 A. That's correct, yes.</p> <p>6 Q. Were you confident that, as far as the current state of</p> <p>7 intelligence was concerned, those people manning the</p> <p>8 Covert Monitoring Post understood the nature of the</p> <p>9 operation --</p> <p>10 A. Yes -- sorry, go on.</p> <p>11 Q. -- sufficient to be able to determine what was relevant?</p> <p>12 A. Yes, I was, 100 per cent confident.</p> <p>13 Q. I would like to ask you some questions about C3000, we</p> <p>14 have received information setting out the size of the</p> <p>15 room, how many people would have been there. We also</p> <p>16 know that there were loggists present.</p> <p>17 A. That's correct, yes.</p> <p>18 Q. Were you familiar with the CLIO logging system?</p> <p>19 A. I wasn't very familiar with it at all. I had never</p> <p>20 worked in 3000 before personally.</p> <p>21 Q. This was your first experience of it?</p> <p>22 A. My first experience of working inside, yes.</p> <p>23 Q. Had anybody explained to you what the CLIO logging</p> <p>24 system was able to do?</p> <p>25 A. Not in detail. Obviously I had an awareness, I had seen</p> <p style="text-align: center;">Page 114</p>
<p>1 hard copies of it in the past --</p> <p>2 Q. Right.</p> <p>3 A. -- but I didn't have --</p> <p>4 Q. Do you mean printouts?</p> <p>5 A. Yes, in the past, yes.</p> <p>6 Q. Yes.</p> <p>7 A. But I did not have a detailed briefing on how the CLIO</p> <p>8 system would work. I just had an awareness of it.</p> <p>9 Q. In one of your witness statements you make reference to</p> <p>10 the fact that there was a whiteboard present in the</p> <p>11 control room. Do you remember that?</p> <p>12 A. I don't remember that, could you assist with that,</p> <p>13 sorry?</p> <p>14 Q. Yes, I will, yes. I do not have it immediately to hand,</p> <p>15 but I will find it over the lunchtime adjournment.</p> <p>16 Is your evidence that you don't remember mentioning</p> <p>17 it in your witness statement?</p> <p>18 A. I -- no, I don't remember it and I --</p> <p>19 Q. Do you remember there being a whiteboard?</p> <p>20 A. -- don't specifically remember one now, but obviously if</p> <p>21 I have put that in my statement I remembered it at the</p> <p>22 time.</p> <p>23 Q. I was going to ask you what use, if any, you made of it</p> <p>24 but I anticipate the answer to that would be you can't</p> <p>25 remember?</p> <p style="text-align: center;">Page 115</p>	<p>1 A. No, I definitely didn't make use of it, no.</p> <p>2 Q. Okay.</p> <p>3 The inquiry has also heard from an officer with the</p> <p>4 cipher A179, who described yesterday that they were</p> <p>5 monitoring the radio and using a map and an iPad,</p> <p>6 I think to follow the course that the Audi was taking</p> <p>7 that morning.</p> <p>8 Were you involved in providing that officer with</p> <p>9 instruction as to how he should perform his duty?</p> <p>10 A. No, I wasn't. I think he was there to assist S48, he</p> <p>11 was there to assist S48.</p> <p>12 Q. He was, right, so did you have any conversation with</p> <p>13 him?</p> <p>14 A. I don't recall speaking to him. I may have had -- if</p> <p>15 I did, it would have been one, no more than one update.</p> <p>16 In terms of the surveillance updates I was getting,</p> <p>17 obviously I was listening to the radio as best I could</p> <p>18 myself.</p> <p>19 Q. Yes.</p> <p>20 A. But if I was detracted from that, if I was getting</p> <p>21 updates from other areas that I needed then to get</p> <p>22 an update as to what was happening surveillance wise,</p> <p>23 I went to Inspector Chris Davies, who was the</p> <p>24 coordinator for the three surveillance teams.</p> <p>25 Q. Right, okay.</p> <p style="text-align: center;">Page 116</p>

29 (Pages 113 to 116)

<p>1 Just before we break then for lunch, I am ably 2 helped by Ms McNeill with what I expect it will be the 3 reference to the whiteboard. It is MPS25. This is your 4 hard copy statement behind tab 10 in our bundle, and at 5 page 2, we can see four lines down, yes: 6 "During the PIM process a the list of pseudonyms was 7 supplied by one of the PIM officers and from memory 8 written on a whiteboard in C3000 where we made our full 9 statements ..." 10 In fact, does that refer only to the use of the 11 whiteboard during the post-incident procedure? 12 A. It does. Yes. That was just to assist me, because 13 obviously I worked with most of the officers on 14 a day-to-day basis and I didn't want to write their 15 names down if they already had pseudonyms/ciphers. 16 Q. Does that help you in remembering whether or not that 17 whiteboard was available earlier on during the 18 deployment in the morning or do you think it might have 19 been brought in during the post-incident procedure? Or 20 don't you know? (Pause) 21 A. I can't recall specifically whether we were given 22 pseudonyms before the operation or immediately after 23 what had happened -- 24 Q. Yes. 25 A. -- we were given pseudonyms and they were then written</p> <p style="text-align: center;">Page 117</p>	<p>1 on the whiteboard for to us take away in terms of any 2 statements that we might make. 3 And as I am answering that, I think it was probably 4 the latter. 5 Q. Right. 6 The question I posed was around whether or not the 7 whiteboard was available during the deployment in the 8 morning or whether you think that that might have been 9 brought in during the post-incident procedure? 10 A. Oh, I think the whiteboard is on the wall anyway, from 11 memory. 12 Q. So it is not a mobile whiteboard, it is on the wall? 13 A. Not from memory. Again, obviously I am a little bit 14 sketchy on that, so I can't assist 100 per cent but 15 I think it was on the wall anyway. 16 Q. In any event, from recollection, you didn't make use of 17 it prior to the post-incident procedure when the 18 pseudonyms were written on it? 19 A. That's correct. 20 MS BLACKWELL: Thank you. 21 Sir, is that an appropriate moment for us to break? 22 THE CHAIRMAN: 1.50? Is that sufficient time for everyone. 23 MS BLACKWELL: Yes. 24 THE CHAIRMAN: 1.50 it is. 25 Thank you.</p> <p style="text-align: center;">Page 118</p>
<p>1 (1.00 pm) 2 (The Luncheon Adjournment) 3 (1.50 pm) 4 THE CHAIRMAN: Yes. 5 MS BLACKWELL: Thank you, sir. 6 Just before lunch we were talking about the setup of 7 the control room, and we became rather stuck on whether 8 or not there was a whiteboard there. 9 There has been reference made to two rooms off the 10 main control room, one being the Covert Monitoring Post 11 and the other being something described as 12 an intelligence support cell. 13 Could you tell us what that was, please? 14 A. Yes, we had -- sorry, we had two members of staff there, 15 an analyst and researcher and a researcher, who were 16 there basically to assist with any snippets of 17 information or intelligence that we had that could 18 assist in identifying conspirators, provide details of 19 addresses, possible vehicles, anything that we could get 20 support on actually to support the operation. 21 Q. How were they utilised over the course of the morning? 22 A. We only had snippets, I think there were some snippets, 23 from memory, of names that were given to them to 24 research and, from recollection, I don't believe they 25 were able to achieve too much with the limited stuff</p> <p style="text-align: center;">Page 119</p>	<p>1 they were provided. 2 Q. Did you have any direct contact with those sitting in 3 the intelligence support cell? 4 A. From memory, not from the commencement of the 5 surveillance to the conclusion. 6 Q. Right. 7 We also touched upon the CLIO system, and you were 8 assigned a CLIO loggist, weren't you? 9 A. Yes, I was, yes. 10 Q. Where did she sit in conjunction to where you were 11 sitting? 12 A. At times she was sat next to me. There were other times 13 that I moved away from her. A couple of reasons, one 14 that she wasn't able to hear some of the intelligence 15 updates that I was receiving. 16 Q. Why was that? 17 A. For legality reasons. 18 Q. For? 19 A. Legality reasons. 20 Q. Would it have been possible to assign yourself or have 21 assigned to you a CLIO loggist that did have clearance 22 to hear those intelligence updates? 23 A. That may have been possible, that is not something 24 I researched prior to the operation. 25 Q. Right, because it sounds as if that would have been more</p> <p style="text-align: center;">Page 120</p>

30 (Pages 117 to 120)

<p>1 convenient and useful?</p> <p>2 A. It was certainly, again, with hindsight be worth</p> <p>3 exploring. I am not sure whether any CLIO loggist would</p> <p>4 have that necessary clearance.</p> <p>5 THE CHAIRMAN: There's only one way of finding out.</p> <p>6 A. That's correct.</p> <p>7 THE CHAIRMAN: Yes.</p> <p>8 MS BLACKWELL: You were going to go on, I think, to tell us</p> <p>9 the second reason why you moved away from her?</p> <p>10 A. And then there are times when I left where we were sat</p> <p>11 to go and speak specifically to other officers, that</p> <p>12 might have been S48, it might have been Inspector Davies</p> <p>13 from the surveillance team.</p> <p>14 Q. Right. I am not going to take you through the CLIO log,</p> <p>15 I know that will be done with other witnesses later on</p> <p>16 today or possibly tomorrow.</p> <p>17 A. Yes.</p> <p>18 Q. But would it be a fair summary to say that you perhaps</p> <p>19 didn't make the greatest use of her throughout the</p> <p>20 course of the morning?</p> <p>21 A. Yes, I mean, I am not sure if you mentioned the name,</p> <p>22 but Emily Blakeney was my assigned loggist. When I met</p> <p>23 her that morning, as I alluded to before lunch, I hadn't</p> <p>24 any direct experience myself of using it and so I was</p> <p>25 relying on her a little bit to provide some initial</p> <p style="text-align: center;">Page 121</p>	<p>1 guidance --</p> <p>2 Q. Right.</p> <p>3 A. -- about how it works, and I tried as best to use the</p> <p>4 CLIO system alongside my handwritten log, operational</p> <p>5 log on the day. My experience from the day is that they</p> <p>6 are not compatible, and so I probably would have been</p> <p>7 better just sticking with my handwritten log on the day</p> <p>8 and if there were specific policy decisions that</p> <p>9 I wanted to put onto the CLIO system, then I should have</p> <p>10 just used her a bit more sparingly.</p> <p>11 But I tried, in the spirit of the CLIO system, to</p> <p>12 maintain a log through her as well as my handwritten log</p> <p>13 and, as I say, the practicalities of that dictated that</p> <p>14 I didn't think that was compatible with hindsight, and</p> <p>15 that is why there may be some disparity between my</p> <p>16 handwritten log and everything that was recorded on the</p> <p>17 CLIO or things that I put on the CLIO added at the time</p> <p>18 when I could add them.</p> <p>19 Q. Yes. Well I was going to come to that, because although</p> <p>20 it looks as if you have provided her with one or two</p> <p>21 pieces of information during the earlier part of the</p> <p>22 morning, it is not really until after the interception</p> <p>23 that you then provide her with a series of detailed</p> <p>24 notes, which she puts on the log at one time?</p> <p>25 A. That's correct. Obviously during the latter stages of</p> <p style="text-align: center;">Page 122</p>
<p>1 the operation, I was away from her all the time.</p> <p>2 Q. Yes.</p> <p>3 A. In very close proximity to S48 and Inspector Davies, and</p> <p>4 I was away from her and obviously I was making</p> <p>5 handwritten notes and didn't have the opportunity to</p> <p>6 converse with her and get them put onto the CLIO system.</p> <p>7 So although I was cognisant that I was doing that</p> <p>8 retrospectively, I felt, again, trying to do the right</p> <p>9 thing in terms of recording things on CLIO, that I would</p> <p>10 add them, obviously knowing that they would be put on</p> <p>11 retrospectively and timed.</p> <p>12 Q. Did you do that by reading out what you had put on your</p> <p>13 handwritten log?</p> <p>14 A. More or less. There may be slight variations, but more</p> <p>15 or less, yes.</p> <p>16 Q. One of the benefits of using the CLIO system is that the</p> <p>17 information which you provide to the loggist is then</p> <p>18 capable of being seen by others, isn't it?</p> <p>19 A. That's correct, yes. And again, because I was</p> <p>20 unfamiliar, I probably didn't appreciate that.</p> <p>21 Q. Right. And, of course, it provides a certain audit</p> <p>22 trail, retrospectively, as to what has gone on?</p> <p>23 A. Exactly, yes.</p> <p>24 Q. Thank you.</p> <p>25 We spoke this morning about tipping points, and we</p> <p style="text-align: center;">Page 123</p>	<p>1 established once again that in your mind there were</p> <p>2 evidential tipping points and geographical tipping</p> <p>3 points.</p> <p>4 Whose job was it to determine when a specific</p> <p>5 tipping point was reached?</p> <p>6 A. That would be me.</p> <p>7 Q. Right. Did you expect to have consultation with either</p> <p>8 the tactical adviser or the strategic firearms commander</p> <p>9 in determining when that point had been reached?</p> <p>10 A. Not specifically. Obviously I had spoken around tipping</p> <p>11 points with Mr Turner before the operation, and</p> <p>12 I believe I would have mentioned to S48 about the</p> <p>13 geographical tipping point I had in mind, about the A1</p> <p>14 junction of the 406. In relation to him, I wouldn't</p> <p>15 expect to discuss evidential or intelligence -- there is</p> <p>16 evidential tipping points and intelligence tipping</p> <p>17 points. I wouldn't expect to discuss those with him and</p> <p>18 I would be surprised if he expected me to discuss those</p> <p>19 with him either.</p> <p>20 Q. But you would discuss them with S48?</p> <p>21 A. No, sorry, I would discuss both geographical</p> <p>22 intelligence evidence with Craig Turner, I think I would</p> <p>23 have discussed the geographical with S48 but not the</p> <p>24 intelligence/evidence.</p> <p>25 Q. Sorry, I misheard you.</p> <p style="text-align: center;">Page 124</p>

<p>1 A. That is all right.</p> <p>2 Q. In relation to each of those types of tipping points,</p> <p>3 were you expecting to be assisted by the information</p> <p>4 coming from the Covert Monitoring Post?</p> <p>5 A. Yes, that was one of the factors and obviously</p> <p>6 an important factor on the day in my decision making.</p> <p>7 Q. Were you involved in providing any guidance to those in</p> <p>8 the Covert Monitoring Post as to how that information</p> <p>9 should come to you?</p> <p>10 A. I mean obviously when I went and spoke to them, and</p> <p>11 obviously speaking to FE19, and also Rob Murray about</p> <p>12 how it was going to work, obviously I was made aware</p> <p>13 that the intention was obviously they would have</p> <p>14 a number of people listening to the product, and then</p> <p>15 officers relaying it to me by way of, like a relay,</p> <p>16 basically, it was a relay-relay, if you see what I mean.</p> <p>17 Q. I described it as a tag team, I think yesterday --</p> <p>18 A. Yes, and I was happy that that was sufficient for what</p> <p>19 I wanted, by that way, as I said this morning, I wanted</p> <p>20 to know anything and everything, unless it was obvious</p> <p>21 it had no relevance, and that was the way it was all</p> <p>22 going to come to me and then I could assess that in</p> <p>23 conjunction with what I was being told from</p> <p>24 surveillance, maybe from other intelligence sources and</p> <p>25 that would assist me in my decision making.</p> <p style="text-align: center;">Page 125</p>	<p>1 Q. My question was really whether you had any involvement</p> <p>2 in providing that briefing or setting up that system</p> <p>3 with those in the Covert Monitoring Post, or did you</p> <p>4 simply react to somebody else taking that upon</p> <p>5 themselves?</p> <p>6 A. No, that was I think a combination of FE19, maybe</p> <p>7 Rob Murray setting that up. I was briefed how they</p> <p>8 intended to do it and I was happy that that was the way</p> <p>9 they were going to do it and I couldn't think of any</p> <p>10 better way.</p> <p>11 Q. Right.</p> <p>12 Were you concerned that there had been no CMP</p> <p>13 manager assigned?</p> <p>14 A. I wasn't concerned in terms of an official CMP manager.</p> <p>15 Obviously I had two supervisory officers, who were both</p> <p>16 performing that function alongside other functions, and</p> <p>17 I thought that was sufficient in terms of supervision of</p> <p>18 the CMP.</p> <p>19 Q. Right.</p> <p>20 THE CHAIRMAN: That would of course depend, would it not, on</p> <p>21 the experience of those supervisory officers and the</p> <p>22 knowledge --</p> <p>23 A. It would, but I had confidence in their ability and</p> <p>24 their experience, sir.</p> <p>25 THE CHAIRMAN: I know you had confidence in them. Did you</p> <p style="text-align: center;">Page 126</p>
<p>1 apply your mind to the experience which they had in the</p> <p>2 field of covert monitoring?</p> <p>3 A. Certainly I was aware that Mr Murray had some very good</p> <p>4 and detailed experience of that specifically in his</p> <p>5 career CV.</p> <p>6 THE CHAIRMAN: The other officer would have been?</p> <p>7 A. That would have been FE19, and I can't recall</p> <p>8 specifically his experience levels.</p> <p>9 MS BLACKWELL: Of working in a Covert Monitoring Post?</p> <p>10 A. I can't recall, yes.</p> <p>11 Q. He told the inquiry this morning that he had some</p> <p>12 experience -- an experience, about 10 years beforehand,</p> <p>13 I think, or maybe even 15 years and then one more</p> <p>14 recently, so two occasions that he had worked in</p> <p>15 a Covert Monitoring Post.</p> <p>16 Do you consider that provided him with sufficient</p> <p>17 experience to be working there in a supervisory</p> <p>18 capacity?</p> <p>19 A. I was happy with him being there in a supervisory</p> <p>20 capacity.</p> <p>21 Q. Based on what?</p> <p>22 A. Based upon my knowledge of him as an officer, his</p> <p>23 supervisory skills, I would describe FE19 as</p> <p>24 an excellent operative in terms of fighting crime on the</p> <p>25 street and knowing what is going on in the streets.</p> <p style="text-align: center;">Page 127</p>	<p>1 So he -- in my opinion, he would be ideal to</p> <p>2 supervise what was going on in the CMP.</p> <p>3 Q. You must have become aware during the course of the</p> <p>4 morning that he wasn't even going into the room, never</p> <p>5 mind supervising those inside it?</p> <p>6 A. I was aware that there had been a slight alteration in</p> <p>7 his role, because initially he was going to take the</p> <p>8 product from the listeners and that changed. But as far</p> <p>9 as I was aware, he still retained responsibility for the</p> <p>10 overall intelligence that was coming into C3000, both</p> <p>11 the intelligence cell and 3000, so as far as I was</p> <p>12 aware, he would still have been dipping in and out of</p> <p>13 there to make sure things were going okay.</p> <p>14 Q. He told the inquiry this morning that he wasn't doing</p> <p>15 that.</p> <p>16 A. Obviously I am aware of that, but it was my belief on</p> <p>17 the day that he was.</p> <p>18 THE CHAIRMAN: Can you just explain or help in relation to</p> <p>19 this.</p> <p>20 You have told us what an excellent officer at</p> <p>21 fighting crime FE19 was.</p> <p>22 A. Yes.</p> <p>23 THE CHAIRMAN: But you knew nothing, it seems to me, based</p> <p>24 on your evidence, about his experience in covert</p> <p>25 monitoring and how to handle it? Is that a fair way of</p> <p style="text-align: center;">Page 128</p>

1 putting it so far?
 2 **A. That would be correct, sir, yes.**
 3 THE CHAIRMAN: Based with that lack of knowledge, how could
 4 you be satisfied that he was the right man to supervise
 5 the other people?
 6 **A. The CMP work is something that is done fairly rarely.**
 7 MS BLACKWELL: Fairly what, sorry?
 8 **A. Rarely.**
 9 Q. Rarely.
 10 **A. Rarely, so it is not uncommon that officers do not have**
 11 **extensive experience and in terms of the calibre of**
 12 **officers I had at the central task force, SCO7, were**
 13 **experienced detectives who were flexible and that could**
 14 **apply their minds to various tasks that they were asked**
 15 **to perform. I was confident that FE19 was very well**
 16 **qualified, not specifically but well qualified in**
 17 **general to perform that role.**
 18 THE CHAIRMAN: Thank you.
 19 MS BLACKWELL: As the inquiry knows, there came a point just
 20 before 7.00 when FE19 imparted to you some intelligence
 21 about the ability of the gang to obtain a firearm.
 22 **A. That's correct, yes.**
 23 Q. Shortly I will invite you to take us through your
 24 written log, upon which that appears as one of the
 25 entries.

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1 FE19, were specifically chosen for their ability to act
 2 properly, I am going to suggest, within the Covert
 3 Monitoring Post. Do you agree?
 4 **A. Yes, that's correct, yes.**
 5 Q. Yes.
 6 Was it not possible to provide those officers with
 7 information which may well have assisted them without
 8 a concern that it would somehow jeopardise the quality
 9 or the reasonable acceptability, I suppose, of the
 10 product that they would bring to you?
 11 **A. No, I don't believe so, in terms -- as I say, it is**
 12 **a fundamental principle of intelligence handling that**
 13 **you don't seek to influence the source of the**
 14 **intelligence in any way, shape or form. That maintains**
 15 **the integrity of the system and in my view, and**
 16 **experience, also improves the accuracy and reliability**
 17 **of what they relay to you as what they have heard.**
 18 Q. When you received the information from FE19 that the
 19 gang or the conspirators had only been able to source
 20 an imitation firearm, did you consider that that may be
 21 a gas-powered imitation firearm?
 22 **A. I did not consider that at that time.**
 23 Q. Right. One that would necessarily have required
 24 a canister, a gas canister, to operate?
 25 **A. No, I had nothing at that time to lead me to start**

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1 When you received that intelligence, did you
 2 consider making sure that that reached the ears of those
 3 in the Covert Monitoring Post?
 4 **A. I did not consider that, no.**
 5 Q. Right. Should you have considered it?
 6 **A. I don't believe I should have considered it.**
 7 Q. Why not?
 8 **A. Because a fundamental principle of intelligence handling**
 9 **is that you do not affect the mindset of potential**
 10 **sources, and I've got two years' experience of being**
 11 **an intelligence controller dealing with some very**
 12 **sensitive intelligence sources for the Metropolitan**
 13 **Police Service. If you do that, people naturally either**
 14 **tell you what they think you want to hear or what you**
 15 **may want to hear. In terms of the overall efficiency of**
 16 **what they are doing, they should just listen to what**
 17 **they are being asked to listen to and relay that.**
 18 **Then it was my responsibility as the tactical**
 19 **firearms commander to assess that intelligence along**
 20 **with everything else I had.**
 21 Q. Do I take it from your answer that one of your concerns
 22 was that it might have unduly influenced them in terms
 23 of what they heard or thought they might have heard?
 24 **A. Yes, that's correct, yes.**
 25 Q. These were officers who, the inquiry has heard from

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1 **thinking in that direction.**
 2 Q. Was that something which you thought perhaps should have
 3 been told to those in the Covert Monitoring Post, in
 4 order to educate them in the same way that the briefing
 5 had done that morning about the sorts of things that
 6 might be discussed between the conspirators?
 7 **A. As I said, there was no indication from that**
 8 **intelligence that I was passed of any nature at that**
 9 **time around any gas-canister or gas-powered firearm, so**
 10 **I had no reason then to go and speak to anybody else**
 11 **about that, it was not even mentioned at that time.**
 12 Q. No, but you are and were at that time a very experienced
 13 firearms officer, weren't you?
 14 **A. Tactical firearms commander, yes. I am not a firearms**
 15 **officer.**
 16 Q. Well, forgive me.
 17 You had a wealth of knowledge about gang use of
 18 firearms, didn't you?
 19 **A. I had a considerable knowledge, yes.**
 20 Q. Yes. When you were told that the gang had only managed
 21 to source an imitation firearm, what went through your
 22 mind about the possibilities of how that might look?
 23 **A. In terms of the specific nature of any imitation**
 24 **firearm, it didn't go through my mind. That was -- the**
 25 **intelligence was at that stage that it was that they had**

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<p>1 only managed to source an imitation firearm, the 2 specific nature of that imitation firearm I did not 3 consider. 4 My consideration was, when that intelligence was 5 received -- and it was obviously some time old, so 6 therefore I had some intelligence gaps to consider and 7 from -- excuse me -- from the intelligence that was 8 passed to me, I had reason to believe that that -- that 9 situation may change between when that intelligence was 10 first received and when we were passed it. 11 Q. One of the ways for you to establish whether or not that 12 situation had changed was to seek to find out what was 13 being discussed in the car, wasn't it? 14 A. Yes, that would be an important source of corroborating 15 or confirming other firearms had been sourced. 16 Q. Yes, so what would have been wrong with saying to those 17 in the Covert Monitoring Post: 18 "I have received intelligence that the gang have 19 only managed to get an imitation firearm, it is very 20 important that we seek to establish whether or not that 21 position has been maintained or has changed, so I want 22 you to concentrate on anything that you hear about 23 firearms, canisters, anything of that nature." 24 A. Well, I didn't think that I needed to specify that to 25 them. Obviously I had spoken to them previously and</p> <p style="text-align: center;">Page 133</p>	<p>1 explained to them I wanted anything and everything that 2 they had, unless it was clearly not relevant, and so 3 that is -- that aspect of it. And, as I have just 4 alluded to, the fundamental principle of intelligence 5 handling is that you do not seek to influence the 6 mindset of the listeners. 7 THE CHAIRMAN: Think about, that, please, how could your 8 posing your enquiry in the way which Ms Blackwell has 9 suggested, in other words as a completely open and 10 unloaded question, how could that influence the 11 intelligence that they communicated to you? Because 12 they would not know, would they, whether you wanted 13 information that pointed one way or another; they were 14 simply being asked, or would have been asked by you, for 15 information which pointed either way? 16 A. They were aware that I wanted anything and everything, 17 which is, as it says on the tin, so I didn't feel that 18 I needed to put that specifically to them for the 19 reasons I have alluded to, sir. 20 THE CHAIRMAN: Nothing to do with the question of 21 influencing their approach, simply because you had made 22 it clear anyway, is that the point? 23 A. No, no, no, that is another aspect to it. 24 As I said, it is a fundamental principle of 25 intelligence handling that you don't seek to influence</p> <p style="text-align: center;">Page 134</p>
<p>1 the source of that intelligence in any way. 2 THE CHAIRMAN: That begs the question, doesn't it, whether 3 the intelligence that you are looking for is 4 intelligence which there might be a subconscious desire 5 to misinterpret? 6 A. There was no subconscious desire to misinterpret 7 anything, sir, they were listening, they were reporting 8 what they heard and it was my role as the tactical 9 firearms commander to assess that intelligence, but that 10 was my role and not their role. 11 THE CHAIRMAN: Thank you. 12 MS BLACKWELL: Did you do anything, following your receipt 13 of that information just before 7.00 am, to seek to 14 determine if the position had changed? In other words, 15 to seek to determine if the gang had managed to source 16 a real firearm? 17 A. That was the intelligence that was passed to me at 6.58. 18 Q. Yes. 19 A. My decision then was to wait, basically. 20 Q. Until what? 21 A. It wasn't a time for any sort of knee-jerk reaction in 22 terms of responding to that intelligence, because that 23 intelligence was, I think it is a the phrase you may 24 have even used in your opening notes, somewhat stale. 25 There had been a considerable time period and because of</p> <p style="text-align: center;">Page 135</p>	<p>1 what I was told by FE19, in my view there was a real 2 possibility that that may have changed in the time 3 period between the initial receipt of that intelligence 4 and that being passed to us. 5 My decision was to wait for further intelligence 6 updates that I might have received, or an indication 7 from the probe that would either confirm or rebut that 8 intelligence. 9 Q. If I asked you to explain why you didn't tell those in 10 the Covert Monitoring Post that that is what you were 11 waiting for, that that was really important, your answer 12 would be the same as that that you have already 13 provided? 14 A. Absolutely. That would be the answer, yes. 15 THE CHAIRMAN: Yes. 16 MS BLACKWELL: Before we leave this point, one of the 17 principal aspects of your evidential tipping point was 18 being in receipt of sufficient evidence, not 19 intelligence but evidence, in order to arrest and 20 subsequently prosecute the gang members for either 21 firearms or the escape plot attempt? 22 A. That's correct, yes. 23 Q. So we know, from the probe, that one of those present in 24 the Audi talks about Serco officers at about 7.30 in the 25 morning.</p> <p style="text-align: center;">Page 136</p>

<p>1 Now that didn't come to you?</p> <p>2 A. That's correct, yes.</p> <p>3 Q. But did it cross your mind that that was perhaps</p> <p>4 something that you might bring to the attention of those</p> <p>5 in the Covert Monitoring Post, that any reference to</p> <p>6 custodian officers, to the prison van, to Serco, should</p> <p>7 be listened out for?</p> <p>8 A. I didn't think I needed to tell the officers -- I think</p> <p>9 that was pretty self evident.</p> <p>10 Q. All right.</p> <p>11 Because from listening to the evidence of</p> <p>12 Mr Hawthorn yesterday, it may be thought that he was</p> <p>13 given an almost impossible task, listening and repeating</p> <p>14 at the same time to what he was receiving. I just</p> <p>15 wonder whether, in hindsight, you think it may have been</p> <p>16 of assistance to him, and others in the Covert</p> <p>17 Monitoring Post, to have provided them with a list of</p> <p>18 words, by way of enthusiastic sort of assistance, you</p> <p>19 know, to remind them as they are listening what they</p> <p>20 might find to be of imperative importance?</p> <p>21 A. I didn't consider that that would have been of use on</p> <p>22 the day. I was aware that it was a difficult job in</p> <p>23 there.</p> <p>24 Q. Yes.</p> <p>25 A. I was aware that although at times the recording was</p> <p style="text-align: center;">Page 137</p>	<p>1 clear, there were times where there was overtalking and</p> <p>2 maybe multiple voices overtalking --</p> <p>3 Q. Yes.</p> <p>4 A. -- and I was aware that DC Hawthorn and whoever was</p> <p>5 listening in that monitoring post may miss certain</p> <p>6 things.</p> <p>7 So it was another reason I took into account in</p> <p>8 terms of, I suppose, putting an onus on them to come up</p> <p>9 with an interpretation, because in many ways that would</p> <p>10 be unfair because they were not actually necessarily</p> <p>11 getting everything, the full picture.</p> <p>12 So it was really a case from my point of view of</p> <p>13 jigsaw building a picture, of which the Covert</p> <p>14 Monitoring Post was providing me with certain pieces to</p> <p>15 place alongside any other intelligence I got, my</p> <p>16 knowledge of the organised crime group, my experience as</p> <p>17 a detective and particularly working with the</p> <p>18 intelligence from the NCA for over 20 years, my</p> <p>19 experience as a tactical firearms commander and any</p> <p>20 other intelligence updates I got throughout the course</p> <p>21 of the morning.</p> <p>22 THE CHAIRMAN: Yes.</p> <p>23 MS BLACKWELL: It was vital for you to know at any given</p> <p>24 time where the subjects of the three individual</p> <p>25 surveillance deployments were located, wasn't it?</p> <p style="text-align: center;">Page 138</p>
<p>1 A. That's correct, and obviously that is why I drew up</p> <p>2 a bespoke grid, to assist me in that.</p> <p>3 Q. Yes, and we will shortly turn to look at that.</p> <p>4 A. Yes.</p> <p>5 Q. Did you know who the conspirators were?</p> <p>6 A. I did not, other than Ozcan Eren, obviously he was going</p> <p>7 to be playing a command and control role and obviously</p> <p>8 his cousin Izzet, who was in prison. They were the only</p> <p>9 two that we knew.</p> <p>10 Q. In relation to Ozcan Eren, intelligence was received at</p> <p>11 05.57 to suggest that he was in the Tottenham area and</p> <p>12 then the next reference to him, certainly from the CLIO</p> <p>13 log, is a possible sighting of him at 0917 hours.</p> <p>14 Do you agree with that?</p> <p>15 A. That would be about right, yes.</p> <p>16 Q. Yes.</p> <p>17 You were completely unaware of his position or what</p> <p>18 he was doing between 6.00 am and 9.15?</p> <p>19 A. There was a potential that he actually had met the</p> <p>20 occupants of the Audi around about 7.30, but that was</p> <p>21 not confirmed on surveillance.</p> <p>22 Q. Other than that, there was no sighting of him, was</p> <p>23 there?</p> <p>24 A. That's correct, yes.</p> <p>25 Q. You didn't know which of the five vehicles that had been</p> <p style="text-align: center;">Page 139</p>	<p>1 attributed to him by Mr Kinch in his briefing the day</p> <p>2 before, he may have been driving?</p> <p>3 A. That's correct, yes.</p> <p>4 Q. In the event, he wasn't driving any of them, was he, he</p> <p>5 was driving a sixth vehicle?</p> <p>6 A. I believe that is correct, yes.</p> <p>7 Q. Yes.</p> <p>8 Although you had intelligence that Mr Ozcan Eren had</p> <p>9 been involved in the planning of the escape attempt, you</p> <p>10 did not know precisely what role he might be playing in</p> <p>11 the attack?</p> <p>12 A. The intelligence suggested he would be playing a command</p> <p>13 and control role and not hands on, we would say, himself</p> <p>14 in the commission of the offence.</p> <p>15 Q. Although the Audi vehicle which had had the probe</p> <p>16 inserted into it was expected to be a mission vehicle,</p> <p>17 in the sense that it would play some part in the escape</p> <p>18 attempt, you didn't know the precise nature of that part</p> <p>19 that it would play?</p> <p>20 A. No, certainly not at the start of the day. It obviously</p> <p>21 became clear that it would be used as at least one of</p> <p>22 the principal vehicles.</p> <p>23 Q. Yes. You didn't know the registration of the prison van</p> <p>24 until it was leaving Wormwood Scrubs?</p> <p>25 A. It was slightly before it left Wormwood Scrubs, from</p> <p style="text-align: center;">Page 140</p>

35 (Pages 137 to 140)

<p>1 memory, but we didn't have it in advance, no.</p> <p>2 Q. You didn't know in advance how many prisoners would be</p> <p>3 on the van?</p> <p>4 A. No, that information was provided on the morning.</p> <p>5 Q. You didn't know the route that the van would take?</p> <p>6 A. That's correct, we had a good idea but we didn't have it</p> <p>7 confirmed.</p> <p>8 Q. Were you confident in the early hours of the morning of</p> <p>9 11 December that you would be able to keep tabs on the</p> <p>10 van, the Audi and Ozcan Eren?</p> <p>11 A. Certainly in terms of the Audi, yes.</p> <p>12 Certainly in terms of the van, yes.</p> <p>13 And we were confident that we would be able to</p> <p>14 get -- certainly a phrase we would use within the</p> <p>15 profession would be a lock on to Ozcan --</p> <p>16 Q. Right.</p> <p>17 A. -- at the address we expected him to be at, but it</p> <p>18 transpired he wasn't at that address.</p> <p>19 Q. Which laid open the possibility that he could blindside</p> <p>20 your operation by attacking the van himself?</p> <p>21 A. Yes, that possibility was never ruled out. Hence the</p> <p>22 contingencies we put in place around the van.</p> <p>23 Q. The inquiry has heard that the Audi vehicle, when it was</p> <p>24 parked up on the Eastern Road car park, was covered by</p> <p>25 a static camera --</p> <p style="text-align: center;">Page 141</p>	<p>1 A. Yes, that's correct.</p> <p>2 Q. -- but that the camera was not of any use in the hours</p> <p>3 of darkness, because of the way in which it was set up?</p> <p>4 A. That's correct.</p> <p>5 Q. In fact, although there was some suggestion that it may</p> <p>6 have captured the vehicle leaving the car park in the</p> <p>7 early hours of the morning, it was not possible to</p> <p>8 identify the driver or anybody else getting into the</p> <p>9 vehicle?</p> <p>10 A. I remember vividly seeing the vehicle move and the</p> <p>11 camera was basically blinded by the headlights.</p> <p>12 Q. Right. Were there surveillance officers on the gates of</p> <p>13 the car park waiting to catch a glimpse of whoever it</p> <p>14 was that was driving it out of the car park?</p> <p>15 A. I believe -- this may need to be confirmed, I believe we</p> <p>16 did have some static officers in that vicinity. They</p> <p>17 were not on the gates of the car park but they were in</p> <p>18 that vicinity to assist in potentially identifying</p> <p>19 people going to and from the car.</p> <p>20 Q. Right.</p> <p>21 We heard yesterday, as you and I have already</p> <p>22 discussed this morning, from A179, an officer who was</p> <p>23 tasked with plotting various routes during the course of</p> <p>24 the morning.</p> <p>25 What other assistance were you given by officers in</p> <p style="text-align: center;">Page 142</p>
<p>1 the command and control room as to the direction of</p> <p>2 travel of either the Audi or the prison van?</p> <p>3 A. Well, in terms -- perhaps I will start with the Audi --</p> <p>4 Q. Yes.</p> <p>5 A. -- because obviously the prison van didn't move until</p> <p>6 about 8.30.</p> <p>7 As I said earlier, my point of contact in that</p> <p>8 regard would be Inspector Davies, who was the</p> <p>9 surveillance coordinator.</p> <p>10 Q. Yes.</p> <p>11 A. So I was listening to the surveillance commentary</p> <p>12 myself, I had some maps myself, we had officers also in</p> <p>13 3000 who could assist with putting maps up on the</p> <p>14 screens, et cetera, but obviously because I was</p> <p>15 receiving updates from various other sources, my</p> <p>16 listening to the surveillance was interrupted and then,</p> <p>17 when I had the opportunity, I would go and speak to</p> <p>18 Mr Davies to find out what the update was.</p> <p>19 Q. You have made reference to screens there, what screens</p> <p>20 were the maps being displayed on?</p> <p>21 A. There was a facility in 3000, obviously I have spoken</p> <p>22 about the observation post.</p> <p>23 Q. Yes.</p> <p>24 A. Sorry, observation -- sorry, the briefing log.</p> <p>25 A briefing log being up on the screen, and being</p> <p style="text-align: center;">Page 143</p>	<p>1 constantly evolved.</p> <p>2 Q. The PowerPoint?</p> <p>3 A. Yes, and from memory the room also had the ability to</p> <p>4 put maps up on the screens.</p> <p>5 Q. Right.</p> <p>6 A. And I also had, to assist me, some hard copy maps as</p> <p>7 well, to assist me to try and picture where people were,</p> <p>8 et cetera.</p> <p>9 Q. Were the routes of the Audi and latterly the Serco van</p> <p>10 being plotted on the screen?</p> <p>11 A. No, I don't think so, they were just maps to assist.</p> <p>12 Q. Right.</p> <p>13 A. In terms of the prison van, as soon as that moved I was</p> <p>14 listening to where that was. With particular reference,</p> <p>15 obviously, to when it got onto the North Circular.</p> <p>16 Q. Did you brief the officers who were tasked with</p> <p>17 following the Serco van with the likely route that it</p> <p>18 would take?</p> <p>19 A. Not specifically. My TFC on the ground there did the</p> <p>20 briefing and liaison in relation to that, so, no, in</p> <p>21 answer to your question there.</p> <p>22 Q. I think as we established when you were last at the</p> <p>23 inquiry, it would have been of assistance to have known</p> <p>24 the route in advance, but you provided to the inquiry</p> <p>25 your reasons for not bringing Serco into the loop?</p> <p style="text-align: center;">Page 144</p>

<p>1 A. That's correct, yes.</p> <p>2 Q. All right, I think I would like now for us to look at</p> <p>3 your handwritten log.</p> <p>4 Mr Coates, could we display MPS3577, page 5, please.</p> <p>5 Mr Williams, it may assist you in taking us through</p> <p>6 your log to look not only at what occurs on the plan</p> <p>7 that we can see in front of us, but also to your witness</p> <p>8 statement that lies behind our tab 2, and in particular</p> <p>9 the information that begins on page 11, because I think,</p> <p>10 in this witness statement, prepared by you on</p> <p>11 16 December 2015, you deal with what is contained on</p> <p>12 your handwritten log and additional material which you</p> <p>13 have added in as well from your experience.</p> <p>14 Could I ask you in relation to either document,</p> <p>15 please, and whichever is of more assistance to you, to</p> <p>16 take us through the setting up of this log and then to</p> <p>17 take us through the entries that are timed.</p> <p>18 I may stop you from time to time and ask you</p> <p>19 additional questions.</p> <p>20 A. Yes, certainly.</p> <p>21 Q. Thank you.</p> <p>22 A. Obviously, as I said before, before the operation</p> <p>23 started, I was cognisant that I needed to know, as you</p> <p>24 have alluded to, where each of the three key vehicles</p> <p>25 were going to be, or the three separate deployments were</p> <p style="text-align: center;">Page 145</p>	<p>1 going to be. So obviously I've got column with the</p> <p>2 time, then event/update and then I have broke it down</p> <p>3 into individual columns for the prison van, the Audi and</p> <p>4 subject Borg, ie Ozcan Eren. And then obviously I've</p> <p>5 got a spare column at the end for any other sort of</p> <p>6 updates or other conspirators that might feature.</p> <p>7 Q. Yes.</p> <p>8 A. 5.00 I obviously have put the briefing 3000, staff</p> <p>9 introductions, "Intelligence suggests conspiracy still</p> <p>10 ongoing for today". That refers to the telephone call</p> <p>11 I had had the previous evening.</p> <p>12 Q. The previous evening, when you were at home?</p> <p>13 A. That's correct:</p> <p>14 "Individual armed briefings at Lincoln Road and</p> <p>15 Alperton, non-armed briefing at Holborn."</p> <p>16 Q. Yes.</p> <p>17 A. 5.30 am, obviously I've got a reference to Borg there,</p> <p>18 and obviously he has not been located:</p> <p>19 "Intelligence is he is not located at his address,</p> <p>20 so the team are doing a street search for known</p> <p>21 vehicles."</p> <p>22 On the third column, at that time, it has C/S, which</p> <p>23 refers to cell site, indicated he was in the Tottenham</p> <p>24 area.</p> <p>25 Q. Right.</p> <p style="text-align: center;">Page 146</p>
<p>1 A. At 6.30 am, I've got:</p> <p>2 "The Audi exit Eastern Road, no intel/ID of</p> <p>3 occupants."</p> <p>4 And obviously the van has not moved at that stage,</p> <p>5 the Audi is mobile and we still don't know where Ozcan</p> <p>6 was.</p> <p>7 Q. Yes.</p> <p>8 A. 6.41 am, I am informed there is more than one occupant,</p> <p>9 no further details. That would have been from DC Reddy,</p> <p>10 as he was at the time.</p> <p>11 Q. Yes, thank you, and we can see from FE13 his cipher,</p> <p>12 CMP, that is the Covert Monitoring Post, isn't it?</p> <p>13 A. Yes.</p> <p>14 6.45 am, the occupants of the vehicle are conversing</p> <p>15 in English, still no confirmation of identities,</p> <p>16 speaking of getting others together.</p> <p>17 Again, that has come from Mr Reddy.</p> <p>18 Q. Yes.</p> <p>19 A. Then my next entry, it probably follows on straight</p> <p>20 after I did that, "NDM review", so a national decision</p> <p>21 model review, so in relation to that I am considering</p> <p>22 any change in the threat assessment, any change in the</p> <p>23 rationale for deployment of firearms officers, any need</p> <p>24 to change working strategy. And obviously at that early</p> <p>25 stage there was none, the prison van was still in situ.</p> <p style="text-align: center;">Page 147</p>	<p>1 Q. Right, can we go to the next page, thank you.</p> <p>2 A. 6.55 am, I've got an update, "Two up at least in Audi</p> <p>3 and there is an intention to burn the vehicle later",</p> <p>4 and that has come from FE12.</p> <p>5 Q. Yes.</p> <p>6 A. 6.58 am:</p> <p>7 "Intelligence suggests they will have at least</p> <p>8 an imitation firearm at the time of the offence. No</p> <p>9 specific intelligence they are in possession of it now."</p> <p>10 They just have access to it, that was my assessment.</p> <p>11 Q. That came from FE19, didn't it?</p> <p>12 A. It did, yes.</p> <p>13 Q. You didn't write down the precise wording that he gave</p> <p>14 to you, did you?</p> <p>15 A. I have to be careful what I write down in relation to</p> <p>16 that, which may – for legality reasons, but what I have</p> <p>17 recorded there is my assessment.</p> <p>18 Q. Your assessment was that they will have at least</p> <p>19 an imitation firearm?</p> <p>20 A. That's correct, yes.</p> <p>21 Q. What you had been told by FE19 was that they had only</p> <p>22 been able to source an imitation firearm?</p> <p>23 A. That's correct. Obviously with the time delay that</p> <p>24 needed to be factored in.</p> <p>25 Q. Well, you had not received any further intelligence to</p> <p style="text-align: center;">Page 148</p>

1 suggest that they had managed to source a real firearm,
 2 had you?
 3 **A. I had not, no. So that was my assessment at that time**
 4 **in terms of then building --**
 5 THE CHAIRMAN: That was not a legality reason which
 6 prevented you from writing down what you had been told,
 7 was it?
 8 **A. Well, you have to be careful of that, sir --**
 9 THE CHAIRMAN: I appreciate that, and if anybody --
 10 MR BUTT: Sir, I think we are probably straying into
 11 a difficult area, because the answer the witness would
 12 want to give is one that he cannot.
 13 THE CHAIRMAN: Right.
 14 MR BUTT: It may be we could explore this particular --
 15 THE CHAIRMAN: Can I express the question differently.
 16 MR BUTT: Of course, it is not for me to say so.
 17 THE CHAIRMAN: That is fine, and if you don't want him to
 18 answer it you must say so.
 19 Was there any reason you could not write down what
 20 you had been told in the note that -- I think it was
 21 FE19 --
 22 MS BLACKWELL: It was.
 23 THE CHAIRMAN: -- had made?
 24 **A. I could have written it down verbatim and then I could**
 25 **have then added my assessment of this.**

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1 Could we also play the audio footage that we played
 2 yesterday at 29.18.
 3 I am so sorry, I should have warned that I was going
 4 to play this. Sorry. (Pause)
 5 (2.38 pm)
 6 (Audio recordings were played to the inquiry)
 7 (2.39 pm)
 8 MS BLACKWELL: Pause there, please. We know from the
 9 evidence provided by Mr Hawthorn yesterday that he did
 10 not say those words out loud to those who were listening
 11 to him in the Covert Monitoring Post, and in all
 12 probability did not hear them.
 13 If those words had been brought on a piece of paper
 14 to you by either Mr Reddy or FE12, you would have
 15 written them down on your log, wouldn't you?
 16 **A. That's correct, yes.**
 17 Q. Yes. What thought process would those words have caused
 18 in your mind?
 19 **A. The thought process would be that potentially they**
 20 **corroborated the intelligence at 6.58.**
 21 Q. Yes. Anything else?
 22 **A. Obviously I would still be keeping an open mind, because**
 23 **it is still very early in the operation and there are**
 24 **still the opportunities for further intelligence and**
 25 **evidence to come, to come forward during the course of**

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1 THE CHAIRMAN: You could have done, because do you agree
 2 that by writing down what you have done, you are not
 3 accurately interpreting what you have been told?
 4 **A. I would disagree with that, sir --**
 5 THE CHAIRMAN: Very well.
 6 **A. -- that was my assessment.**
 7 THE CHAIRMAN: Thank you.
 8 Before you go on.
 9 Mr Butt, was that satisfactory?
 10 MR BUTT: Yes, thank you.
 11 THE CHAIRMAN: Thank you.
 12 MS BLACKWELL: May we continue, please, at 7.00 am, thank
 13 you.
 14 **A. Yes:**
 15 **"It appears they are opening fresh mobile phone**
 16 **[should probably read 'phones'] and are applying**
 17 **credit."**
 18 **At 7.02:**
 19 **"Intelligence at least three up in the Audi."**
 20 Q. Can I ask you to pause there, please.
 21 Mr Coates, I am going to ask that we put up
 22 alongside this document the transcript from the Audi,
 23 that is MPS691, at page 4.
 24 I would like us to concentrate, please, on the entry
 25 at 07.02.45.

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1 **the operation.**
 2 Q. Would it have caused you to put out any update to the
 3 surveillance teams?
 4 **A. I would suggest not, no.**
 5 Q. What I am thinking of is, if, as you suggest, the
 6 receipt of these words would have corroborated what you
 7 had received at 6.58 from FE19, then the only other
 8 possibility of those inside the Audi receiving a live
 9 firearm would be if somebody delivered one to them,
 10 wouldn't it?
 11 **A. That was always a consideration.**
 12 Q. Yes.
 13 **A. If you look specifically at what is written here, he is**
 14 **talking about, "Where is the shottey? The big ting",**
 15 **there may well be something else in there as well as**
 16 **that.**
 17 Q. Right.
 18 **A. So obviously reading that now, and obviously it is not**
 19 **the first time I have read it since obviously my**
 20 **assessment of that is written in relation to a shotgun.**
 21 Q. All right. I don't know if you are able to read the
 22 next entry without us making it larger.
 23 **A. What time are you looking at?**
 24 Q. We are now looking at 7.06.
 25 **A. "From FE12, best attack two teams, discussion re**

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38 (Pages 149 to 152)

1 **bringing relative ting, ie firearm, shoot lock three**
 2 **times, if he presses alarm we are gone".**
 3 Q. Pause there, please, and can we go over the page to
 4 page 5 of the transcript.
 5 Could we play the audio footage from 32.40 and
 6 I think we are going to pick up the discussion from
 7 07.06.19 on the transcript, so, "Where is the shotgun?"
 8 (2.43 pm)
 9 (Audio recordings were played to the inquiry)
 10 (245 pm)
 11 MS BLACKWELL: Pause, please.
 12 Listening to the audio footage and considering it
 13 with the transcript, it appears that the occupants of
 14 the Audi are talking about not being provided with
 15 a live firearm, doesn't it?
 16 **A. Well, I think they are specifically talking about the**
 17 **shotgun.**
 18 Q. Yes.
 19 **A. There could have been other firearms, either in that car**
 20 **or brought on to them at a later stage.**
 21 Q. Where is the inference that there are other firearms?
 22 **A. I am saying it could be.**
 23 Q. Based on what?
 24 **A. Because they are specifically talking about the shotgun**
 25 **which they have not had.**

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1 **shotgun, they didn't have a shotgun, but from my**
 2 **perspective, there is other information contained in**
 3 **that transcript which would support the fact that**
 4 **firearms were either in that car or going to be used in**
 5 **the offence.**
 6 Q. I am asking you about this particular entry.
 7 **A. And, as I have said, it is in relation to the shotgun,**
 8 **which they say they did not have.**
 9 Q. Yes.
 10 However, what you were being told at 7.06, by FE12
 11 and at 7.10 by FE13, was that the discussion included
 12 "Best attack two teams", and a discussion about bringing
 13 the real ting, shooting the lock three times, press the
 14 alarm we are gone, giving you the impression that they
 15 were talking about the use of a live firearm?
 16 **A. Yes, that was the impression that I had, that they were**
 17 **talking about the use of a live firearm, yes.**
 18 Q. Looking at the transcript and listening to the audio --
 19 I appreciate in the cold clinical courtroom in which
 20 this inquiry exists -- it is clear, I suggest, that
 21 rather the opposite, from what you were being told, is
 22 being discussed in the car?
 23 **A. Well obviously I had to deal with what I was being told.**
 24 THE CHAIRMAN: You are only being asked to comment upon what
 25 Ms Blackwell is putting. We understand your position,

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1 Q. Yes.
 2 **A. Which they have not got, but what I am saying is there**
 3 **could have been other firearms in the vehicle or other**
 4 **firearms may have been brought on to them at a later**
 5 **stage.**
 6 Q. Well, at the top of page 6 at 07.07.02, somebody appears
 7 to be saying, "The big ting, the shotgun is there to
 8 shoot the lock" and reading further on, there is then
 9 conversation about the guard pressing the alarm they are
 10 gone. There is no suggestion there that they are in
 11 possession of a live firearm, is there?
 12 **A. There is no suggestion there that at that stage they are**
 13 **in possession of a live firearm. Shortly after I think,**
 14 **probably about 20 minutes later, there is a reference**
 15 **to, "If you don't open the door, this thing is getting**
 16 **let off". And then there is a metallic sound you hear.**
 17 Q. If --
 18 **A. Obviously I am being asked in relation to that specific**
 19 **conversation. Clearly now, when you are reading through**
 20 **that and you are assessing that with what was found in**
 21 **the car, and what other people have given an account for**
 22 **what was being spoken to then, there is clearly that you**
 23 **can draw that inference that that is what they are**
 24 **talking about.**
 25 **But in relation to that, they are talking about the**

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1 that, unless you were sure that the up-to-date position
 2 showed that they were not either in possession of or
 3 going to get firearms, you were adopting what might be
 4 described as a safety first approach, in other words
 5 assume the worst-case scenario.
 6 **A. Yes.**
 7 THE CHAIRMAN: Right. Now, what Ms Blackwell is asking you
 8 is whether this, albeit with the benefit of hindsight,
 9 and albeit that you were not told about it, paints
 10 a different picture. Is that the point, Ms Blackwell?
 11 MS BLACKWELL: It is, yes.
 12 **A. I appreciate that, sir. I appreciate that, sir, and**
 13 **apologies if my answer is different to what -- the**
 14 **questions you were seeking.**
 15 **As I say, reading that now, they were talking about**
 16 **a shotgun which they didn't have on them.**
 17 Q. That they didn't have, right.
 18 **A. Yes.**
 19 Q. The reason that I was seeking to establish that issue
 20 with you is to go on to say, had the review and rewind
 21 function been working, and had those in the Covert
 22 Monitoring Post been instructed to listen and relisten
 23 and relisten, if you hear anything about firearms, it
 24 may have been that you would have been given different
 25 information?

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1 **A. That is correct.**
 2 **And I think it is fair to say that if that function**
 3 **had been working, because of the intelligence that I had**
 4 **got at 6.58, that is something that I would have**
 5 **instructed them to concentrate on and review and play**
 6 **function, but I didn't obviously have that opportunity**
 7 **on the day.**
 8 Q. No, thank you.
 9 THE CHAIRMAN: Can you tell us, please, when you found out
 10 that the review function wasn't working?
 11 **A. From memory, it was almost immediately that the**
 12 **operation went live and the car was moving.**
 13 THE CHAIRMAN: Thank you.
 14 MS BLACKWELL: Can you please read out the entry at 7.10:
 15 "FE13: see that thing, canister, that has me and his
 16 prints on it.
 17 "It will be all right ..."
 18 Thank you:
 19 "It will be all right, one not sure?"
 20 "We are just waiting."
 21 Q. Thank you, if we can now go on to page 7 of the
 22 transcript, thank you, at the top of the page, 07.09.02
 23 and we are going to listen to these few lines that start
 24 at 35.40, please, on the audio footage.
 25 (2.50 pm)

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1 offence, isn't it?
 2 **A. It is a very serious offence, yes.**
 3 **I would say in relation to that two things.**
 4 **Firstly, myself, I wasn't convinced 100 per cent**
 5 **that it was in the car.**
 6 Q. Right.
 7 **A. And, secondly, if I was mindful of arresting for**
 8 **possession of imitation firearm with intent to commit**
 9 **an indictable offence, I would need to have the ability**
 10 **in my mind to prove what that specific indictable**
 11 **offence was and at that stage my assessment was that**
 12 **I didn't have sufficient clarity as to what that**
 13 **indictable offence would be, so therefore, bearing in**
 14 **mind our desire to deliver sustainable public protection**
 15 **in the long term for the people of London, that was not**
 16 **a consideration in mind of moving in at that stage,**
 17 **because I didn't have sufficient evidence, in my mind,**
 18 **to indicate what that indictable offence was.**
 19 **Therefore, we may have recovered an imitation firearm,**
 20 **but that would not have delivered sustainable public**
 21 **protection in the long term to the people of London.**
 22 THE CHAIRMAN: Because the sentence wouldn't have been --
 23 **A. That's correct, and also, if I was able to actually**
 24 **convict them of anything other than possession of**
 25 **an imitation firearm.**

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1 (Audio recordings were played to the inquiry)
 2 (2.50 pm)
 3 MS BLACKWELL: Thank you, that was heard and that was
 4 broadly provided to you by FE13, and you have just read
 5 out the way in which you have recorded that part of the
 6 discussion.
 7 **A. Yes.**
 8 Q. When you received that information, did you think that
 9 the reference to canister may well refer to a gas
 10 powered canister that is sometimes used in an imitation
 11 firearm?
 12 **A. Yes, I did, yes.**
 13 Q. Did that corroborate your understanding that
 14 an imitation firearm was within the possession of those
 15 in the Audi?
 16 **A. It would tend to corroborate that, it would point**
 17 **towards that, yes.**
 18 Q. Okay.
 19 Just pausing for a moment, would it have been
 20 possible for you to have swooped in and arrested the
 21 occupants at that time?
 22 **A. Of course it would have been possible.**
 23 Q. Right.
 24 Because possession of an imitation firearm with
 25 intent to commit an indictable offence is a serious

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1 THE CHAIRMAN: You didn't have an indictable offence in
 2 mind?
 3 **A. Well, I had one in mind, obviously that is why we were**
 4 **there, but whether --**
 5 THE CHAIRMAN: Which one did you have in mind?
 6 **A. Obviously the one I had in mind was why we were there in**
 7 **the first place, and that there was a conspiracy to**
 8 **effect the escape of Izzet Eren.**
 9 THE CHAIRMAN: Yes.
 10 **A. But whether I could prove that at that stage, I took the**
 11 **view that I couldn't.**
 12 MS BLACKWELL: Did you discuss your thoughts on that issue
 13 with anybody else?
 14 **A. No, I did not. That fell within my terms and**
 15 **responsibility.**
 16 Q. We know that you didn't seek any assistance from the
 17 Crown Prosecution Service at this stage.
 18 **A. No, that's correct.**
 19 Q. You stand by your response in relation to that, that you
 20 were confident that in your own mind you had evidential
 21 thresholds that needed to be met before you were
 22 prepared to allow the conspiracy to stop?
 23 **A. Yes, I mean that is one of the things that APP talks**
 24 **about in terms of sustainable public protection, it is**
 25 **the length of the custodial sentences to remove the**

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<p>1 threat in the long term. As I said earlier, we could</p> <p>2 have moved in at that stage but in my mind that would</p> <p>3 not have achieved the objectives of the operation.</p> <p>4 Q. Thank you.</p> <p>5 May we go on to the next page of your schedule,</p> <p>6 please.</p> <p>7 It might assist, Mr Coates, if we highlight the</p> <p>8 whole document. Or at least the first part of it.</p> <p>9 Thank you.</p> <p>10 7.15 then, please.</p> <p>11 A. So this is from FE12:</p> <p>12 "Incoming call from Oz. We are going to do this.</p> <p>13 Only us has his number, ie Oz, car burn the car</p> <p>14 afterwards."</p> <p>15 7.20, again from FE12:</p> <p>16 "Conversation re changing vehicles, burning one,</p> <p>17 a reference to Eren."</p> <p>18 Q. Let's just pause again, please, and could we look at</p> <p>19 page 13 of the transcript on the right-hand side. We</p> <p>20 can see halfway down the page, a little further down</p> <p>21 than halfway, at 07.21.07, against the letter C there is</p> <p>22 talk about using the car and the feds and then talking</p> <p>23 about Eren. I would like us to listen to that part of</p> <p>24 the audio footage which starts at 48.00, please.</p> <p>25 (2.56 pm)</p> <p style="text-align: center;">Page 161</p>	<p>1 (Audio recordings were played to the inquiry)</p> <p>2 (2.58 pm)</p> <p>3 MS BLACKWELL: Pause there, please.</p> <p>4 This part of the conversation talks about dropping</p> <p>5 off Eren, taking him to the next whip, dropping him off</p> <p>6 at White Hart Lane, near the school, near the astroturf,</p> <p>7 burning the car, avoiding the feds and one of the</p> <p>8 occupants having to lie down in the car because he is</p> <p>9 Turkish.</p> <p>10 If you had been in receipt of that information,</p> <p>11 would that have gone some way to providing you with your</p> <p>12 evidential threshold?</p> <p>13 A. Maybe slightly, but it wouldn't have pushed me over the</p> <p>14 threshold.</p> <p>15 Q. Why not?</p> <p>16 A. I didn't think it was sufficient, if I had all that.</p> <p>17 THE CHAIRMAN: Did you actually consider it?</p> <p>18 The answer is you couldn't have done because you</p> <p>19 didn't know, did you?</p> <p>20 A. Obviously I haven't got specifically in front of me</p> <p>21 FE12's -- obviously FE12 would have relayed what he had</p> <p>22 written down and I have made notes from that.</p> <p>23 MS BLACKWELL: Your note at 7.20 is, "Conversation re</p> <p>24 changing vehicles, burning one, reference to Eren".</p> <p>25 A. That's correct.</p> <p style="text-align: center;">Page 162</p>
<p>1 So, yes, in answer to the question, in my mind the</p> <p>2 threshold had not been passed.</p> <p>3 Q. It wasn't met?</p> <p>4 THE CHAIRMAN: But in fact, if you had I think this is the</p> <p>5 same exercise that Ms Blackwell asked you to perform</p> <p>6 before, is it a fair comment to make that, had you had</p> <p>7 the conversation which indicated that, well --</p> <p>8 A. I think I refer to my --</p> <p>9 THE CHAIRMAN: Do you think that the conversation, as it is</p> <p>10 recorded, provides clear evidence of what they were in</p> <p>11 the car to do?</p> <p>12 A. I think I recall in my main statement of the</p> <p>13 16 December, that I considered whether -- I make</p> <p>14 reference to the fact that in my mind there was clear</p> <p>15 evidence of criminality.</p> <p>16 THE CHAIRMAN: Yes.</p> <p>17 A. But that did not in my mind give me sort of compelling</p> <p>18 evidence of what the specific criminal conduct was.</p> <p>19 THE CHAIRMAN: I know that, and you have said that, and that</p> <p>20 is why I am asking you to consider, albeit with the</p> <p>21 benefit of hindsight, if you had heard or been told what</p> <p>22 appears in the transcript, would you have been satisfied</p> <p>23 that the evidential threshold had been reached --</p> <p>24 I think that is the point which Ms Blackwell is pursuing</p> <p>25 at this stage, as she did at the earlier stage.</p> <p style="text-align: center;">Page 163</p>	<p>1 A. I understand, and my answer, as I gave earlier, my</p> <p>2 opinion that that would not have reached the threshold</p> <p>3 for me.</p> <p>4 THE CHAIRMAN: Yes.</p> <p>5 MS BLACKWELL: May I invite you to read out the next entry,</p> <p>6 please, at 7.23.</p> <p>7 A. Yes, 7.23:</p> <p>8 "From FE12: put gun in face, can't press it, make</p> <p>9 him bust door open. Need to be in place. Spot near</p> <p>10 court" by 7.30 am".</p> <p>11 Q. Thank you, let's pause again, please. You have recorded</p> <p>12 a reference to putting gun in face, can't press it, to</p> <p>13 make him bust the door open. What was going through</p> <p>14 your mind when you were provided with that information</p> <p>15 by FE12?</p> <p>16 A. On the day, what was going through my mind, the</p> <p>17 potential for a real firearm at the time of the offence.</p> <p>18 And, again, as part of my continual review of the</p> <p>19 situation: did that push me towards the evidential</p> <p>20 threshold? I am getting closer, but it hadn't pushed me</p> <p>21 over that threshold.</p> <p>22 Q. Thank you.</p> <p>23 What about additional reference to, "We need to be</p> <p>24 in place at spot near court by 7.30", the clear</p> <p>25 reference to them wanting to be close to the Crown</p> <p style="text-align: center;">Page 164</p>

41 (Pages 161 to 164)

<p>1 Court?</p> <p>2 A. Yes, of course that is relevant, and of course bearing</p> <p>3 in mind the offence that I was considering, in my mind</p> <p>4 obviously I knew what they were referring to, but I have</p> <p>5 to try and put that into the mind of convincing a CPS</p> <p>6 lawyer. And in my mind, that threshold had not been</p> <p>7 reached.</p> <p>8 Q. It had not been reached, right.</p> <p>9 I am just going to interrupt our flow to ask you</p> <p>10 about areas of vulnerability near the courts.</p> <p>11 Were you aware that in the entrance used by prison</p> <p>12 vehicles to enter the Crown Court construct, concept,</p> <p>13 did you become aware at any time up until this point</p> <p>14 that that spot presented an area of vulnerability for</p> <p>15 the van, because of the slow speed at which the gates</p> <p>16 opened and the familiar sight of vans backing up, if you</p> <p>17 like, to wait to get in?</p> <p>18 A. In answer to your question, not specifically, no.</p> <p>19 Obviously I was aware that a reconnaissance had been</p> <p>20 done by my colleagues at SCO19. But on the day, we</p> <p>21 didn't know where an attack was likely to take place,</p> <p>22 who was going to be involved, what was the exact method</p> <p>23 they were going to use, and obviously as part of our</p> <p>24 strategy, that if we were going to go to a disruption,</p> <p>25 the van would be a long, long way from the court at that</p> <p style="text-align: center;">Page 165</p>	<p>1 stage when we went to an overt disruption on the van.</p> <p>2 So I do not specifically know that, and it wasn't in</p> <p>3 my mindset on the day.</p> <p>4 Q. Because the inquiry has heard from Mr Kinch, as you may</p> <p>5 be aware, that until he went into the court centre that</p> <p>6 day, and spoke to officers in the cell area and Serco</p> <p>7 employees, he was not aware of that vulnerability.</p> <p>8 A. I am aware of that, yes.</p> <p>9 Q. Right, and does that mirror your level of knowledge?</p> <p>10 A. It would do, yes. It would do, yes. But I think the</p> <p>11 whole mechanics of how they were going to carry out the</p> <p>12 attack we didn't know on the day and I've got to say we</p> <p>13 don't really know now.</p> <p>14 Q. We may do after Thursday?</p> <p>15 A. I understand that might be the case, yes.</p> <p>16 And it was always a consideration for me that it was</p> <p>17 unlikely that just one vehicle would be used. Common</p> <p>18 sense would suggest that more than one vehicle would be</p> <p>19 used to box the van in, so that was something else</p> <p>20 I obviously had to consider on the day.</p> <p>21 Q. Yes.</p> <p>22 Had you been aware of that area of vulnerability, do</p> <p>23 you think you would have ensured that there were armed</p> <p>24 surveillance officers presenting themselves at that</p> <p>25 position?</p> <p style="text-align: center;">Page 166</p>
<p>1 A. I don't agree with that, because I think they were</p> <p>2 likely to have been compromised in terms of being</p> <p>3 spotted by the conspirators and that would have</p> <p>4 increased the risk we could have got into a high-speed</p> <p>5 pursuit or foot chase through the streets, which would</p> <p>6 have increased the risks to all parties.</p> <p>7 I suppose in the back of my mind, the actual point</p> <p>8 where the van entered the court was always a likely</p> <p>9 place, but we simply did not know the method of where or</p> <p>10 when they were going to attack it.</p> <p>11 Q. Wouldn't it have been possible to station armed officers</p> <p>12 there covertly?</p> <p>13 A. Yes, but the nature of the OCG and the people we work on</p> <p>14 is that, particularly and I think [FE19] ...</p> <p>15 MS BLACKWELL: Mr Williams unwittingly mentioned a name that</p> <p>16 he shouldn't have done.</p> <p>17 THE CHAIRMAN: We can make the appropriate arrangements.</p> <p>18 Are you content to proceed, Mr Butt?</p> <p>19 MR BUTT: Yes, thank you.</p> <p>20 THE CHAIRMAN: Carry on.</p> <p>21 A. I think FE19 alluded to this morning of the difficulties</p> <p>22 of conducting conventional surveillance in Haringey, the</p> <p>23 nature of the people we work on can readily spot covert</p> <p>24 officers, even if they are covert.</p> <p>25 Q. Right, well I would just like, before we leave this area</p> <p style="text-align: center;">Page 167</p>	<p>1 of your evidence, to listen to what was actually being</p> <p>2 said in the vehicle about this aspect of their plan.</p> <p>3 Mr Coates, please could we go to page 15 of the</p> <p>4 transcript.</p> <p>5 Thank you. I am going to ask that we listen to the</p> <p>6 audio footage from 07.24.23, which is 50.45 on our</p> <p>7 system. Thank you.</p> <p>8 (2.08 pm)</p> <p>9 (Audio recordings were played to the inquiry)</p> <p>10 (3.10 pm)</p> <p>11 MS BLACKWELL: Thank you, pause there, please.</p> <p>12 It appears from what we have just listened to that</p> <p>13 there is a reference to a Rambo knife to stab the wheels</p> <p>14 and then to Serco operatives. If you had been provided</p> <p>15 with that information, would that have satisfied the</p> <p>16 evidential threshold?</p> <p>17 A. That would have been getting very, very close for me.</p> <p>18 But I think what you have to bear in mind also is, at</p> <p>19 that stage, the prison van is still at Wormwood Scrubs,</p> <p>20 and obviously that is something I have to bear in mind</p> <p>21 as well and the amount of control that I had.</p> <p>22 Clearly if I was in possession of information,</p> <p>23 evidence or intelligence that in my mind corroborated</p> <p>24 real firearms, then obviously that escalates my decision</p> <p>25 making and the necessity to take decisive action at</p> <p style="text-align: center;">Page 168</p>

<p>1 an earlier stage --</p> <p>2 Q. Yes.</p> <p>3 A. -- but in my mind, at that stage, the picture in</p> <p>4 relation to real firearms being in possession was not</p> <p>5 clear.</p> <p>6 Q. No.</p> <p>7 A. So, at that stage, I still didn't need to do that, and</p> <p>8 I still had an opportunity to gather more evidence.</p> <p>9 The prison van is still at Wormwood Scrubs, so</p> <p>10 therefore in terms of the threat, that is still low.</p> <p>11 Because of the proximity of the van to the mission car,</p> <p>12 its distance, I have still got opportunities to gather</p> <p>13 more evidence that will hopefully assist in the ability</p> <p>14 to charge the individuals with a substantive criminal</p> <p>15 offences, ie conspiracy to free Izzet Eren. Thereby</p> <p>16 deliver sustainable public protection in the long term.</p> <p>17 Q. You didn't need to wait for the van to leave Wormwood</p> <p>18 Scrubs, did you, in order to reach an evidential</p> <p>19 threshold?</p> <p>20 A. I didn't need to. I didn't need to, but in terms of</p> <p>21 allowing me an opportunity to gather more evidence, and</p> <p>22 prove the conspiracy, with the way we were managing the</p> <p>23 threat, my decision was that I had the ability to allow</p> <p>24 that to happen.</p> <p>25 Q. As we know, it was another hour or so before the prison</p> <p style="text-align: center;">Page 169</p>	<p>1 van left Wormwood Scrubs, wasn't it?</p> <p>2 A. That's correct, yes.</p> <p>3 Q. You didn't think -- well, I know you didn't receive this</p> <p>4 information, but if you had have received reference to</p> <p>5 stabbing the wheels and Serco, at this stage would you</p> <p>6 not have considered that the time had come to arrest the</p> <p>7 occupants and at a stage before the prison van had even</p> <p>8 left?</p> <p>9 A. I certainly would have considered it, and obviously if</p> <p>10 I had the ideal transcripts here, the Rambo knife wasn't</p> <p>11 there to stab the wheels, but it certainly would have</p> <p>12 considered it, but for the reasons I have just said,</p> <p>13 I probably would have left the van still running.</p> <p>14 Q. It rather seems as if what is being discussed is the</p> <p>15 requirement for a man on the inside to bust open the</p> <p>16 door, which may suggest that those occupants in that</p> <p>17 vehicle, the Audi, did not have the means to bust open</p> <p>18 a door?</p> <p>19 A. It may suggest that, yes.</p> <p>20 THE CHAIRMAN: As I understood your evidence before, if you</p> <p>21 had evidence of an offence of possession of an imitation</p> <p>22 firearm with intent to commit an arrestable offence, you</p> <p>23 would have regarded that as sufficient for your purposes</p> <p>24 in achieving sustained public protection and --</p> <p>25 A. I think indictable offence and obviously -- but also you</p> <p style="text-align: center;">Page 170</p>
<p>1 have to take into consideration what that offence is and</p> <p>2 the likely custodial sentence if convicted.</p> <p>3 THE CHAIRMAN: Yes, of course, that's the point.</p> <p>4 Is it your evidence that the likely sentence for an</p> <p>5 offence of possession of an imitation firearm with</p> <p>6 intent to commit an indictable offence, would not have</p> <p>7 been sufficient for you to say that your goal of</p> <p>8 sustained public protection could be achieved?</p> <p>9 A. No, I don't think that is what I am saying, sir.</p> <p>10 What I am saying is at that stage I was unable, in</p> <p>11 my mind, to be confident that I could prove what that</p> <p>12 indictable offence was.</p> <p>13 THE CHAIRMAN: Right.</p> <p>14 A. That is what I am saying.</p> <p>15 THE CHAIRMAN: Even if you had had this, you would still</p> <p>16 have stayed where you were, of not being satisfied there</p> <p>17 was sufficient evidence?</p> <p>18 A. I suppose it comes down to experience over the years, of</p> <p>19 times when you think you have got the most compelling</p> <p>20 case that is watertight and it doesn't prove to be the</p> <p>21 case, so you are always hoping to get to maximise your</p> <p>22 efforts, with the caveat that we do not put anyone under</p> <p>23 additional risk. And, at this stage of the operation,</p> <p>24 I took the view that I wanted opportunity to get more</p> <p>25 evidence, as long as that wasn't going to increase the</p> <p style="text-align: center;">Page 171</p>	<p>1 risk to any of the parties involved.</p> <p>2 THE CHAIRMAN: Yes.</p> <p>3 MS BLACKWELL: Could we continue with your log, please.</p> <p>4 I think you have reached 7.31.</p> <p>5 A. "From FE12: an incoming telephone call, directions to</p> <p>6 the occupants of Audi in Wood Green area."</p> <p>7 Q. Yes.</p> <p>8 A. 7.34, I have got "from intel ..." that may well be</p> <p>9 a combination of FE13 and FE12.</p> <p>10 Q. Yes?</p> <p>11 A. Supplying me information at the same time.</p> <p>12 "There is a second vehicle joining them, maybe Oz</p> <p>13 [ie Ozcan Eren] in this vehicle (not confirmed)."</p> <p>14 Q. Excuse me. FE13 and FE12 would not have been giving you</p> <p>15 that at the same time though, would they, because</p> <p>16 wouldn't one of them have been in the Covert Monitoring</p> <p>17 Post?</p> <p>18 A. I've got my FE numbers a little bit confused there,</p> <p>19 FE13, I was obviously thinking of FE19, but of course</p> <p>20 what I have also put is intel, and of course they are</p> <p>21 not occupying me intelligence, so that is why I may have</p> <p>22 got a little bit confused there.</p> <p>23 It may be the case that it was FE19, not FE13.</p> <p>24 Q. Right. All right.</p> <p>25 A. I can't quite recall.</p> <p style="text-align: center;">Page 172</p>

<p>1 Q. Let's continue please?</p> <p>2 A. 7.38, "Second Audi in convoy, with A6? "</p> <p>3 This is obviously from surveillance, that there is</p> <p>4 a potential vehicle in convoy that is not confirmed.</p> <p>5 Q. All right.</p> <p>6 Over the page, please.</p> <p>7 A. 7.34:</p> <p>8 "Other occupants enter ..."</p> <p>9 Sorry.</p> <p>10 Q. A6, is it?</p> <p>11 A. A6, yes, sorry, thank you, it is quite faint actually:</p> <p>12 "... wearing beanie, wearing dark clothing, possibly</p> <p>13 four up now in the Audi."</p> <p>14 Q. Right, now we know from the CLIO log that there is</p> <p>15 a reference to "at least four in the Audi", and you have</p> <p>16 been told here that it is possibly four up now in the</p> <p>17 Audi, and we can see on the right-hand side of that</p> <p>18 entry, that is from the surveillance, isn't it?</p> <p>19 A. Yes, it is, yes.</p> <p>20 Q. The transcript suggests, if we can just scroll down,</p> <p>21 please, Mr Coates, to the next page, and keep going on</p> <p>22 to the next page, please. Thank you, stop there.</p> <p>23 We can see at 07.38 that what appears to be at least</p> <p>24 one possibly two of the occupants getting out of the</p> <p>25 Audi to relieve themselves and then getting back in</p> <p style="text-align: center;">Page 173</p>	<p>1 again.</p> <p>2 A. That's correct, yes.</p> <p>3 Q. If that is right, are you able to provide an explanation</p> <p>4 as to how the surveillance officers have misinterpreted</p> <p>5 that?</p> <p>6 A. I am not.</p> <p>7 Q. Was the vehicle under surveillance at that time?</p> <p>8 A. So obviously -- yes, it was under surveillance, we</p> <p>9 obviously had technical control on the A6.</p> <p>10 Q. There was a tracker, wasn't there?</p> <p>11 A. There was. We also obviously had conventional</p> <p>12 surveillance officers in support. So the way that would</p> <p>13 work in practice is that in most occasions, the tracker</p> <p>14 would maybe take us with the vehicle whilst it is</p> <p>15 mobile, that would allow that if they were conducting</p> <p>16 any anti-surveillance, that we could remain covert.</p> <p>17 However, when the vehicle comes to a stop, the tracker</p> <p>18 then essentially ceases, although it is still of</p> <p>19 assistance, because we know if it moves, in terms of</p> <p>20 what is going on at that stop.</p> <p>21 At that point in time the conventional surveillance</p> <p>22 officers would move forward.</p> <p>23 Q. Right.</p> <p>24 A. That is not necessarily a --</p> <p>25 Q. It is not foolproof?</p> <p style="text-align: center;">Page 174</p>
<p>1 A. It is not a definitive methodology as to how close they</p> <p>2 get and it has to be done on a bit of a judgment call</p> <p>3 about the nature of the operation, the intelligence and</p> <p>4 whether we can afford to get as close as we would like</p> <p>5 to see what is going on.</p> <p>6 So that is a judgment call of the surveillance team,</p> <p>7 I could have directed them through Mr Davies to get</p> <p>8 really, really close to there, but at that stage</p> <p>9 I didn't want to risk the chance of compromise, because</p> <p>10 obviously the prison van was still at Wormwood Scrubs,</p> <p>11 so they are trying to get as much visual that they can</p> <p>12 do without being compromised.</p> <p>13 Q. But that balancing exercise necessarily means that there</p> <p>14 may be short periods of time when the tracker has</p> <p>15 stopped and the surveillance officers are yet to move</p> <p>16 into position?</p> <p>17 A. Absolutely.</p> <p>18 Q. Yes.</p> <p>19 A. Absolutely, yes.</p> <p>20 Q. All right, thank you.</p> <p>21 A. Could I just add, that was a very important development</p> <p>22 on the morning for me as the TFC.</p> <p>23 Q. Sorry, what was?</p> <p>24 A. This potential meeting. In the greater scheme of</p> <p>25 things, and my decision making on the day, and the</p> <p style="text-align: center;">Page 175</p>	<p>1 reason for that, coming back to the original</p> <p>2 intelligence that was passed to me at 6.58, and my</p> <p>3 assessment that the intelligence picture might change in</p> <p>4 terms of firearms.</p> <p>5 Q. Yes.</p> <p>6 A. Because the indication that we received that that was</p> <p>7 going to be a meeting between Ozcan Eren and obviously</p> <p>8 the occupants of the Audi.</p> <p>9 Q. Yes.</p> <p>10 A. Evidentially of course that would be good, we tried to</p> <p>11 get that but we couldn't.</p> <p>12 Then I had to consider what was the purpose of that</p> <p>13 meeting.</p> <p>14 Q. Are you talking about the meeting that we see</p> <p>15 a reference to at 7.42 or possibly four up in the Audi?</p> <p>16 A. It is all part and parcel of the same event, that --</p> <p>17 Q. Right.</p> <p>18 A. It is all part and parcel of the same event. But</p> <p>19 unfortunately it wasn't clarity around specifically what</p> <p>20 happened. But the indication from all aspects was that</p> <p>21 Ozcan Eren was going to meet the occupants of the Audi.</p> <p>22 Now, my thought process on the day is what is the</p> <p>23 purpose of that meeting, because they had all got brand</p> <p>24 new phones to communicate with, there was no need to</p> <p>25 have a face-to-face meeting just to talk, they had all</p> <p style="text-align: center;">Page 176</p>

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<p>1 had brand new phones. So in my mindset, it was possible 2 that that might have been a time where a firearm was 3 brought onto them. 4 It is also my experience over the years that 5 firearms are often brought onto conspirators fairly late 6 in the day, because they don't want to be sat in 7 a stolen car for any length of time longer than 8 necessary, potentially, with a -- 9 Q. With a live firearm? 10 A. Because, you know, they could always get stopped, and 11 obviously if they are sat in a stolen car, then, you 12 know, the consequences for them, even if there was 13 evidence of their guilty knowledge, is fairly minimal in 14 the greater scheme of things. If you have got a live 15 firearm in there, obviously it is a different kettle of 16 fish. So that's not unusual in terms of criminality in 17 my experience of these things. 18 As I say, I couldn't work out what the purpose of 19 that meeting was in my mind and in my mind it could only 20 have been to give them something, and that was 21 possible -- a firearm. 22 Q. However, had you been aware of what had been discussed 23 earlier on about, "We are not getting it, we are not 24 getting the gun", that might also have informed you? 25 A. Yeah, I mean I was unsure. I was unsure and I think</p> <p style="text-align: center;">Page 177</p>	<p>1 I have been quite consistent throughout in that in my 2 assessment I was unsure of the nature, type, locations 3 of any weapons. 4 Q. Right. 5 Sir, I am conscious that we have been going for over 6 an hour and a half. I probably have another half 7 an hour of questioning for Mr Williams before 8 I conclude. 9 I am in your hands whether you would like to take 10 a break and indeed whether Mr Williams would like 11 a break. 12 THE CHAIRMAN: Mr Williams and perhaps the stenographer, and 13 not to mention you yourself, Ms Blackwell. 14 Shall we resume at 3.35? 15 (3.24 pm) 16 (A short adjournment) 17 (3.35 pm) 18 THE CHAIRMAN: Yes, Ms Blackwell. 19 MS BLACKWELL: Mr Williams, I think we had reached ... 20 Mr Coates, could we have the handwritten schedule 21 back up. Thank you. 22 We had been discussing the possibility of Ozcan Eren 23 coming to meet those in the Audi and you have given your 24 explanation as to why you considered that to be 25 significant.</p> <p style="text-align: center;">Page 178</p>
<p>1 A. That is correct, yes. 2 Q. Could I invite you, please, to read on from 7.42. 3 A. Yes, so again from FE12: 4 "Sounds of movement within vehicle, including zips." 5 Q. Yes. 6 A. That was another factor I took in, that after that 7 meeting, why would then zips being done and I think 8 there were some other sounds from the vehicle as well. 9 Q. You were not being told that Oz had been to meet them, 10 you were being told that Oz is coming to meet them, 11 hadn't you, at 7.42, and the following minute there is 12 reference to zips, did you consider that that meeting 13 had taken place? 14 A. I think from memory, my assessment was that -- I can't 15 remember when the movement was on the vehicle or away 16 from there, but it was either at that meeting or shortly 17 after that meeting, that there were sounds of zips being 18 fastened and unfastened within the vehicle. 19 Q. Right. Continue, please. 20 A. So then, as I say I have -- that was a significant 21 meeting for me, and I have obviously then reapplied the 22 national decision model at 7.45: 23 "But still no confirmation of weapons in the Audi 24 A6, van has not left the prison, good control, threat 25 low, I am going to wait."</p> <p style="text-align: center;">Page 179</p>	<p>1 In my mind I still had insufficient at this stage 2 and obviously I made a note that Borg, ie Ozcan, is not 3 under control. 4 That is another factor, obviously in my decision 5 making on the day, that in an ideal world we would have 6 Ozcan under control so that if I did move forward to 7 arrest/detain the occupants of the Audi, ideally we 8 would be able to do the same contemporaneously with 9 Ozcan. So that was another factor that was spinning 10 around in my head. 11 Q. Yes. Continue, please. 12 A. 7.53, from FE12, "Conversation of bash up and use of 13 another vehicle". 14 8.00 am from FE12, "Believe the Audi is still two 15 up. Oz knows we are on point". 16 Q. Yes, on to the next page, please. 17 Here we are, 8.02? 18 A. Yes, 8.02 sorry, yes, from Mr Reddy, "Occupants of the 19 Audi are concerned about local residents". 20 Q. Yes. 21 A. 8.08, from FE12, "Incoming call, any time soon. This is 22 the perfect place". 23 They are speak about a crossroads and I've put 24 a note, "There is crossroad just (Inaudible) north of 25 the Audi", and at that stage it is believed two up with</p> <p style="text-align: center;">Page 180</p>

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<p>1 one out on foot.</p> <p>2 Q. Right, now by 8.08, at the time at which you made this</p> <p>3 record, we know that the Audi had settled in Bracknell</p> <p>4 Close, in the position that it was occupying when the</p> <p>5 interception took place.</p> <p>6 A. That's correct, yes.</p> <p>7 Q. So we now know that it was positioned there for 50</p> <p>8 minutes before the interception took place.</p> <p>9 A place that was close to the Crown Court. Is there</p> <p>10 any reason why surveillance officers were not sent in</p> <p>11 number to see what they could see, be it into the car,</p> <p>12 the number of occupants, that sort of thing. We know</p> <p>13 that an officer did perform that task, but I am asking</p> <p>14 you about the extent of surveillance that could have</p> <p>15 been instructed --</p> <p>16 A. Yes --</p> <p>17 Q. -- at that time?</p> <p>18 A. -- again it comes down to the balancing act of how much</p> <p>19 from our own point of view we wish to push the</p> <p>20 surveillance officers forward at the risk of</p> <p>21 compromising the operation. At that stage I was still</p> <p>22 hoping for more evidence --</p> <p>23 Q. Right.</p> <p>24 A. -- and obviously we had the technical control on the</p> <p>25 car. And obviously we were looking at maps and the</p> <p style="text-align: center;">Page 181</p>	<p>1 nature of what the geographical area was, would it be</p> <p>2 somewhere that surveillance officers could actually</p> <p>3 physically get close to comfortably without being</p> <p>4 compromised.</p> <p>5 Obviously bearing in mind there have been comments</p> <p>6 obviously about concerns about possible builders in the</p> <p>7 area or residents noticing them.</p> <p>8 Q. Yes.</p> <p>9 A. And obviously also a lookout that was maybe out on foot.</p> <p>10 Q. Yes.</p> <p>11 A. So they are obviously looking for us as much as we are</p> <p>12 looking for them. It is a game of cat and mouse, and it</p> <p>13 is also in many respects, using the analogy of a game of</p> <p>14 poker, where you do not want to show your hand unless</p> <p>15 you absolutely have to. And at that stage the van is</p> <p>16 still at Wormwood Scrubs, we have control on the Audi,</p> <p>17 I didn't feel that I needed to be pushing my</p> <p>18 surveillance officers to get in really close at that</p> <p>19 stage. I think the chances of compromise outweighed</p> <p>20 that and obviously that would increase risk.</p> <p>21 Q. There had of course earlier on been a conversation about</p> <p>22 them getting lost and joking and laughing about that.</p> <p>23 I think that had been brought to your attention, which</p> <p>24 might not suggest an awareness of surveillance.</p> <p>25 However, that of course has to be balanced with what</p> <p style="text-align: center;">Page 182</p>
<p>1 you have just made reference to, which is them</p> <p>2 discussing the builders and the residents and that</p> <p>3 conversation displaying an awareness of surveillance?</p> <p>4 A. Yes, that is correct, and obviously bearing in mind</p> <p>5 other intelligence that we had, this was a specifically</p> <p>6 recruited team of proven individuals.</p> <p>7 Q. Yes.</p> <p>8 A. So the assessment was that they would be well versed in</p> <p>9 police covert techniques.</p> <p>10 Q. Thank you. Could you read on, please. I think we are</p> <p>11 at 8.08?</p> <p>12 A. Yes, "Izzet Eren ..." Sorry, from FE12, "Incoming call,</p> <p>13 any time soon, this is the perfect place ..." Oh,</p> <p>14 I have done that one, sorry.</p> <p>15 Q. We have done that, sorry, that is my fault.</p> <p>16 A. 8.10, "Izzet Eren in holding area at HMP Wormwood</p> <p>17 Scrubs, threat remains low".</p> <p>18 Can I just say at this point, I have only got half</p> <p>19 my page highlighted. Probably going back to 8.08</p> <p>20 I think it was, or 8.02, at that stage there was other</p> <p>21 intelligence that came in, if you look on the right-hand</p> <p>22 side column, that there was possibly a third eye in the</p> <p>23 Bounds Green area. So that was another factor that had</p> <p>24 to be taken into account, and possible resources were</p> <p>25 sent that way to try and identify and get control of</p> <p style="text-align: center;">Page 183</p>	<p>1 them.</p> <p>2 Q. You have noted that in the others column, haven't you?</p> <p>3 A. Yes, I have.</p> <p>4 THE CHAIRMAN: Yes.</p> <p>5 MS BLACKWELL: All right.</p> <p>6 Is that 8.23?</p> <p>7 A. It is 8.23, and that probably is, again, in reference to</p> <p>8 what I have just spoken about, that that might have been</p> <p>9 a confirmation of who that third eye was and so my --</p> <p>10 officers from my team have been deployed, spare</p> <p>11 officers, to try and get a lock on to him.</p> <p>12 Q. Yes, then at 8.26?</p> <p>13 A. "Izzet Eren is on the prison van at Wormwood Scrubs."</p> <p>14 THE CHAIRMAN: Where does that information come from?</p> <p>15 A. We obviously had an officer at Wormwood Scrubs --</p> <p>16 THE CHAIRMAN: So he would contact you?</p> <p>17 A. I think he went through Mr Murray.</p> <p>18 THE CHAIRMAN: You were not simply making a note of what was</p> <p>19 coming from the covert monitoring room, you were also</p> <p>20 making a note of what you were told by your own</p> <p>21 officers?</p> <p>22 A. That's correct, sir.</p> <p>23 THE CHAIRMAN: Yes.</p> <p>24 MS BLACKWELL: Yes.</p> <p>25 A. 8.29:</p> <p style="text-align: center;">Page 184</p>

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<p>1 "The van is mobile towards the prison gates."</p> <p>2 Q. Right.</p> <p>3 Next page, please, Mr Coates. Yes.</p> <p>4 A. "The van has left the prison, it is three up in terms of</p> <p>5 prisoners."</p> <p>6 Q. That is 8.40, isn't it?</p> <p>7 A. It is, yes.</p> <p>8 Q. Then we have 8.45, now there is no entry on the event or</p> <p>9 update but, again, on the right-hand side of the column,</p> <p>10 which we have not got highlighted in the others, you</p> <p>11 have, "SCO7 units deployed to locate".</p> <p>12 A. That's correct, I think that is still the -- the other</p> <p>13 conspirator, who may have been out as a third eye.</p> <p>14 Q. Right, and then at 8.48?</p> <p>15 A. From Mr Reddy, "Registration number has been discussed</p> <p>16 within the Audi".</p> <p>17 Q. Yes.</p> <p>18 A. "? Prison van's registration."</p> <p>19 Q. You were in possession of the registration number of the</p> <p>20 prison van, weren't you?</p> <p>21 A. That's correct. I am not sure the people the CMP were</p> <p>22 in possession of that, so that is maybe why Mr Reddy has</p> <p>23 said the registration number has been discussed within</p> <p>24 the Audi. That is possibly prison van, is it the prison</p> <p>25 van?</p> <p style="text-align: center;">Page 185</p>	<p>1 Q. Is there any reason why you hadn't provided them with</p> <p>2 that information?</p> <p>3 A. Probably in line with what I said, mentioned earlier,</p> <p>4 but specifically obviously that is not really going to</p> <p>5 be affecting their interpretation, so that could have</p> <p>6 been provided to them, I said that, yes.</p> <p>7 Q. Thank you.</p> <p>8 THE CHAIRMAN: Can we just have a look, please, if there is</p> <p>9 anything in the notes that corresponds with the</p> <p>10 conspirators being aware of the registration number of</p> <p>11 the vehicle.</p> <p>12 MS BLACKWELL: In the transcript?</p> <p>13 THE CHAIRMAN: Yes.</p> <p>14 MS BLACKWELL: It is a little further down on page -- give</p> <p>15 me a moment, please.</p> <p>16 It is page 21, the final page.</p> <p>17 THE CHAIRMAN: Thank you.</p> <p>18 MS BLACKWELL: The top of that page, you can see the letters</p> <p>19 being read out.</p> <p>20 THE CHAIRMAN: At 8.50, if you had seen this, you would have</p> <p>21 been satisfied, would you not, that the conspirators</p> <p>22 knew the registration number of the vehicle?</p> <p>23 A. That was the tipping point, yes, for me. On the day.</p> <p>24 THE CHAIRMAN: Would it be fair to say that, whatever</p> <p>25 misgivings you had about the sufficiency of evidence to</p> <p style="text-align: center;">Page 186</p>
<p>1 justify the charge of possession of an imitation firearm</p> <p>2 with intent to commit an indictable offence, that would</p> <p>3 have been sufficient?</p> <p>4 A. Yes, in my mind, that was the specific course of conduct</p> <p>5 that would have been agreed for a conspiracy, yes, with</p> <p>6 that van in mind.</p> <p>7 THE CHAIRMAN: Yes, but it didn't lead to an arrest?</p> <p>8 A. Well --</p> <p>9 MS BLACKWELL: You called state amber didn't you, very soon</p> <p>10 after that.</p> <p>11 A. Yes, that was the point that I was then moving towards</p> <p>12 calling state amber, but before I did that, I had to</p> <p>13 move the surveillance officers closer, so they could get</p> <p>14 that tight control that we wanted, so that they could</p> <p>15 paint the picture for the surveillance -- sorry, for the</p> <p>16 firearms officers as they were moving in. And I also</p> <p>17 needed the firearms officers to move forward from where</p> <p>18 they were holding at Quicksilver, get in their formation</p> <p>19 so they were ready. So once they were ready, once I had</p> <p>20 the surveillance tight control, then I called amber, so</p> <p>21 there was a few minutes' delay. It did seem a long time</p> <p>22 on the day, because I am also obviously listening to</p> <p>23 where the van is on the A406, and I do recall that there</p> <p>24 appeared not to be a lot of traffic on the A406, which</p> <p>25 was unusual.</p> <p style="text-align: center;">Page 187</p>	<p>1 So I am getting all those assets in place, ready to</p> <p>2 go, I am listening where the van is, is it still far</p> <p>3 enough away? Yes, it was and then obviously we may come</p> <p>4 on to this in a moment, in consultation with my tactical</p> <p>5 adviser and basically I call state amber at that stage.</p> <p>6 Q. Right, and just to finish off your schedule, if we may,</p> <p>7 8.51, "SCO19 move forward to get in position in vicinity</p> <p>8 of Audi", 8.53, "At layup point, SCO35 to get visual to</p> <p>9 ..."</p> <p>10 "Arrest control" is that?</p> <p>11 A. "Assist control".</p> <p>12 Q. I am so sorry. Over the page, please, Mr Coates, 08.57</p> <p>13 you have recorded "amber"?</p> <p>14 A. That's correct, yes.</p> <p>15 THE CHAIRMAN: Thank you.</p> <p>16 A. I would like to highlight that obviously we have spoken</p> <p>17 about things that were missed on the transcript that</p> <p>18 I was unaware of and how that might have affected my</p> <p>19 decision making.</p> <p>20 THE CHAIRMAN: I think a lot of the questions that</p> <p>21 Ms Blackwell has asked you have been focused on that.</p> <p>22 A. That's correct, and there is obviously one specific</p> <p>23 comment I think it is worth highlighting for the</p> <p>24 purposes of the inquiry, and that is after the</p> <p>25 conspirators were told which cell Mr Izzet Eren is, that</p> <p style="text-align: center;">Page 188</p>

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<p>1 he has been in the first door on the right, there is</p> <p>2 a reference to, "So here is the door, first door on your</p> <p>3 right, so the door is here boom, boom".</p> <p>4 MS BLACKWELL: Yes.</p> <p>5 A. I think it is important to bring that to the attention</p> <p>6 of the inquiry, because if --</p> <p>7 Q. Thank you.</p> <p>8 A. -- I had the full transcript in front of me as I am</p> <p>9 making all my decision making, obviously in my opinion</p> <p>10 that is a very clear and direct reference to possession</p> <p>11 of a viable firearm.</p> <p>12 Q. Right, but we know that it wasn't, because they didn't</p> <p>13 have a firearm, did they?</p> <p>14 A. Not in that car but as I say, I did not know if another</p> <p>15 car was going to assist them.</p> <p>16 Q. Understood.</p> <p>17 A. And they may well have been in possession of it and all</p> <p>18 through I think I have been consistent in reference to</p> <p>19 any firearms I was talking about at the time of the</p> <p>20 offence.</p> <p>21 Q. All right, thank you for raising that and we can see --</p> <p>22 in fact by coincidence we are looking at that page.</p> <p>23 For the reference, it is 09.00.41.</p> <p>24 Thank you, we can take those documents down now,</p> <p>25 please, Mr Coates.</p> <p style="text-align: center;">Page 189</p>	<p>1 Did you have any involvement in directing the</p> <p>2 officers on the ground as to the precise nature of the</p> <p>3 interception and how that should look?</p> <p>4 A. Well, obviously the actual tactic that we were going to</p> <p>5 use, and we did use, that was my decision.</p> <p>6 Q. Yes.</p> <p>7 A. And that was an extraction.</p> <p>8 Q. Have you had an opportunity of considering the evidence</p> <p>9 given by S48 to the inquiry?</p> <p>10 A. Yes, I have.</p> <p>11 Q. Right.</p> <p>12 You will know the questions I posed to him about the</p> <p>13 rejection of the containment and call out option in</p> <p>14 favour of the extraction?</p> <p>15 A. Yes, I am aware, yes.</p> <p>16 Q. Yes.</p> <p>17 Was the option of containment and call out ever</p> <p>18 seriously considered by you?</p> <p>19 By that I mean: did you ever think that that was</p> <p>20 either a possibility or a probability?</p> <p>21 A. It was certainly always a possibility, because obviously</p> <p>22 at that point in time, and the ultimate decision, the</p> <p>23 ultimate decision was really only made when -- just</p> <p>24 before going to state amber, but obviously, probably</p> <p>25 from about 8.30, when the van is about to leave the</p> <p style="text-align: center;">Page 190</p>
<p>1 prison or on the road, from my point of view I am coming</p> <p>2 to crunch time, because obviously that is then moving</p> <p>3 towards the Audi and then I've got a limited window in</p> <p>4 which I've got to make a decision.</p> <p>5 So probably at that time discussions were had both</p> <p>6 with myself, S48, and Keely Smith, who was the TFC on</p> <p>7 the ground, and obviously S48 with his OFC.</p> <p>8 It is fair to say that did we have sit down -- there</p> <p>9 were only two options at that stage, there was going to</p> <p>10 be an extraction -- if the car stayed there, it could</p> <p>11 have been moved of course at that stage, you had only</p> <p>12 two options extraction or containment and call out.</p> <p>13 It is fair to say did we sit down and consider</p> <p>14 individually the pros and cons of both, and the answer</p> <p>15 to that is no. But S48 throughout the course of the</p> <p>16 deployment, it was continually approaching me as things</p> <p>17 developed, saying, "If you were considering this, you</p> <p>18 would want to think about that" or, "This geographical</p> <p>19 consideration, you need to consider that".</p> <p>20 So it really was an evolving process, that by the</p> <p>21 time we got to those discussions, 8.30 onwards, the</p> <p>22 viability of a containment and call out had been</p> <p>23 disregarded.</p> <p>24 Q. Right.</p> <p>25 A. And therefore, in my mind, the only viable option was</p> <p style="text-align: center;">Page 191</p>	<p>1 extraction and that was the preferred tactical advice of</p> <p>2 S48, not that he was impressing that on me, directly,</p> <p>3 but obviously from the advice he was giving me,</p> <p>4 throughout the operation, and at that specific point in</p> <p>5 time. That that was his preferred tactical option.</p> <p>6 Q. We know that a message went over the airwaves to</p> <p>7 indicate that the attack was going to be firearms</p> <p>8 enabled.</p> <p>9 A. Yes, that's correct, yes.</p> <p>10 Q. You have been asked about your involvement with that</p> <p>11 phrase, and in more than one witness statement which you</p> <p>12 have provided to this inquiry, and also to the IPCC, you</p> <p>13 have indicated that you don't recollect providing that</p> <p>14 phrase to Bill Scammell for him to put that out?</p> <p>15 A. I did not give that directly to Bill Scammell. The</p> <p>16 correct sequence of events as to what happened I am now</p> <p>17 in my mind satisfied what happened.</p> <p>18 Q. Please tell us.</p> <p>19 A. I was not, unfortunately, ever provided copies of</p> <p>20 Mr Scammell's statement or Chris Davies, inspector,</p> <p>21 statements as part of any disclosure to me. So I was --</p> <p>22 answering those or providing those statements a little</p> <p>23 bit in the dark.</p> <p>24 Q. Would it have helped you to have been provided with</p> <p>25 that?</p> <p style="text-align: center;">Page 192</p>

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<p>1 A. Yes, absolutely. It was only in 2019, when Mr Futter, 2 who sits behind you, contacted me and provided me with 3 a copy of the IPCC report that I was aware of the 4 contents of their statement.</p> <p>5 And very quickly I realised that the conversation 6 that I had with Inspector Davies that I thought was 7 a lot later, I thought it was probably about around 8 about the 8.30 mark, in fact it was at the 7.30 mark and 9 this is the sequence of events, that Mr Davies 10 approached me and obviously his role was a surveillance 11 coordinator, his priority was the safety of his 12 officers, so he was very keen to know what if any 13 specific updates there were in relation to the real 14 firearms. And my answer to him was that I was unable to 15 provide any specific updates, they may have been in 16 possession of firearms, but I was unsure as to the 17 nature, location or type of any firearms.</p> <p>18 He asked me again if there was anything specific 19 that he could give to his officers --</p> <p>20 Q. Could I just ask you to pause for a moment, please, 21 because I am not clear about when this conversation was 22 taking place.</p> <p>23 A. It was probably I think the firearms enabled went out 24 7.29, is that correct?</p> <p>25 Q. Yes, so shortly before then?</p> <p style="text-align: center;">Page 193</p>	<p>1 A. Yes, probably a minute or two before that, yes.</p> <p>2 Q. Sorry, I interrupted you, you were saying that Mr Davies 3 went on to ask whether it was possible to provide his 4 officers --</p> <p>5 A. Disseminate to his officers only what, if any, there was 6 any updates, specific dissemination that I could provide 7 in relation to the possession of firearms.</p> <p>8 As he pressed me on that, the only thing I said to 9 him was that the only thing I can give those officers is 10 that if there is to be an offence, that it would be 11 a gun-enabled offence.</p> <p>12 What I did mean by "gun enabled"? Well, APP 13 classifies gun crime as follows, "An offence where 14 a firearm is fired, used to threaten, used as a blunt 15 instrument, it can even be an intimation that you are in 16 possession of a firearm, if you have the intention for 17 the victim to believe and the victim believes it".</p> <p>18 In relation to that, real firearms, fake firearms, 19 air weapons, all count.</p> <p>20 So coming back to my earlier comment to him, it is 21 that I was unable to be specific as to the nature, type, 22 location of any firearms. He pressed me on that. 23 I said all I can give him, if it is to be an offence, it 24 will be a gun-enabled offence. He said can I give that 25 to my officers? And I said yes you can, I think that</p> <p style="text-align: center;">Page 194</p>
<p>1 was a fair request from him, that is his responsibility 2 to his officers, because obviously, as we have spoken 3 about a few minutes ago, some of those officers were 4 going to be tasked with getting really, really close to 5 these guys and not all the surveillance officers are 6 armed, only some on the team are armed, so they would 7 want to know which officers are going to push in that 8 little bit closer and they would also be armed for their 9 self protection.</p> <p>10 So it was a perfectly valid question and it was 11 perfectly valid for me to give that to his officers.</p> <p>12 But it was to his officers that that dissemination 13 was meant to go out.</p> <p>14 I then -- we have then departed, I think I had one 15 or two other people queuing up to speak to me, maybe 16 Mr Reddy or FE12 for example, and then obviously I was 17 aware that the circulation had gone out over the main 18 working channel.</p> <p>19 Q. Which had not been your intention?</p> <p>20 A. That had not been my intention. I thought, because it 21 was specifically to his team, that it might have been 22 a phone call to the team leader, or surveillance teams 23 have their own way of communicating, maybe a group text 24 or group WhatsApp, sort of facility they would have, 25 that they could communicate themselves. So that was my</p> <p style="text-align: center;">Page 195</p>	<p>1 thought, that that is how it was going to be 2 communicated, not going over the working channel.</p> <p>3 What went out of course was "firearm enabled", which 4 is slightly different to what I said. But in the course 5 of that conversation with Mr Davies firearms had been -- 6 the word "firearm" had obviously been used.</p> <p>7 Q. Yes.</p> <p>8 A. So it was a slight difference from what I had told him, 9 and it went out over the main working channel.</p> <p>10 Q. In practical terms, what is the difference in your mind 11 between "gun enabled" and "firearms enabled"?</p> <p>12 A. Well, gun enabled really is, as I gave the definition, 13 an all-encompassing classification of what is a gun 14 crime. In practice, personally I only use "gun enabled" 15 but in practice, I know that both "gun enabled" and 16 "firearms enabled" are used.</p> <p>17 Q. Interchangeable really?</p> <p>18 A. That is the word, thank you. Interchangeable, in 19 practice.</p> <p>20 Q. Right.</p> <p>21 If you were confident in the phrase that you landed 22 upon, gun enabled, what was wrong with that phrase being 23 broadcast to all of the officers?</p> <p>24 A. There was nothing specifically wrong with that. In my 25 mind, obviously, bearing in mind what I had had at 6.58</p> <p style="text-align: center;">Page 196</p>

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<p>1 and then I had had at 7.06, that was consideration of 2 what if anything I am going to tell the firearms 3 officers. My view was that I didn't need to tell them 4 specifically anything, because the threat in terms of 5 their view -- it was believed by us that it would be 6 likely that firearms would be used on this offence, and 7 that was obviously part of the FA forms and briefings 8 that were given.</p> <p>9 Q. Yes.</p> <p>10 A. I didn't think I needed to put into their mind 11 specifically that it might have been imitation or it 12 might be a real firearm. Potentially, another very 13 significant thing for me was that the information I had 14 from the audio probe was that shots would be fired at 15 the time of the offence.</p> <p>16 Q. All right.</p> <p>17 A. I did not want to influence the firearms officers in 18 terms of thinking imitation, and most definitely not 19 that there was potential for shots and that coming back 20 to the considerations that we have spoken about all the 21 way through this operation in terms of Article 2, in my 22 view, increased the risk if the firearms officers went 23 forward thinking there was a potential for shots to be 24 fired. In my view that increased the risk 25 disproportionately and not commensurate with Article 2</p> <p style="text-align: center;">Page 197</p>	<p>1 for the occupants of that car. That is why I did not 2 specifically mention to the firearms officers the 3 potential that shots were going to be fired.</p> <p>4 Q. Right, well attempting to unpick that, if you had before 5 you the transcript of the audio probe that we have 6 looked at today, and you had taken that in conjunction 7 with and as corroboration of the information that you 8 had received at 6.58, that the gang had only managed to 9 obtain an imitation firearm, would you have made the 10 decision to inform the firearms officers on the ground 11 that all of the intelligence and information you had at 12 that point suggested only an imitation firearm was in 13 the car?</p> <p>14 A. As I said earlier, my decision then was to wait to see 15 if there is anything further. So at 6.58 I probably 16 wouldn't have. But if two hours later, at the point 17 that I am asking those officers to go forward, if I had 18 had nothing else, if I had had -- obviously say the 19 probe itself went down, we had nothing else --</p> <p>20 Q. Can I just interrupt you, please, I am not asking you 21 about that situation. I am asking you about 22 a hypothetical situation in which you had listened to 23 every word on that probe and you, I think, accept that 24 the contents of the discussion appears to corroborate 25 the information that you had received at 6.58, that the</p> <p style="text-align: center;">Page 198</p>
<p>1 gang only had an imitation firearm. If that was the 2 position, at 9.00 when you called state amber, would you 3 have told the firearms officers approaching that vehicle 4 that the gang only had an imitation firearm?</p> <p>5 A. I wouldn't -- and referring to the comment I made 6 probably about five minutes ago, "First door on the 7 right, and boom, boom".</p> <p>8 THE CHAIRMAN: Well you called state amber before "boom, 9 boom".</p> <p>10 A. I would have to double check.</p> <p>11 THE CHAIRMAN: According to the log, you called state amber 12 at 8.57 and the "boom, boom", is it 9 --</p> <p>13 MS BLACKWELL: 9.00.41.</p> <p>14 THE CHAIRMAN: 9.00.41.</p> <p>15 A. Okay.</p> <p>16 THE CHAIRMAN: So you didn't have "boom, boom" --</p> <p>17 A. No, but I also had --</p> <p>18 THE CHAIRMAN: Just a moment, please -- operating on your 19 mind, did you, at the time when you called state amber?</p> <p>20 A. Thanks for correcting me on that. That's correct, sir.</p> <p>21 THE CHAIRMAN: Whether you thank me or not, that is a fact, 22 isn't it?</p> <p>23 A. That is a fact, yes.</p> <p>24 THE CHAIRMAN: Yes.</p> <p>25 A. But what I also had in my mind that was always the case,</p> <p style="text-align: center;">Page 199</p>	<p>1 potential for other firearms to be brought on and 2 referring to that meeting --</p> <p>3 THE CHAIRMAN: That, with respect, is what you have relied 4 upon throughout, isn't it, you never knew what was going 5 to happen over and above the picture painted by the 6 intelligence which was gleaned from the covert 7 monitoring?</p> <p>8 A. Sorry?</p> <p>9 THE CHAIRMAN: You were always prepared for the worst and 10 not prepared to act on the best, is that a fair way of 11 putting it?</p> <p>12 A. I wouldn't say that is correct. I made an assessment 13 that would -- to make the decisions that would maximise 14 the safety of all parties and deliver the working 15 strategy of this operation.</p> <p>16 THE CHAIRMAN: Yes.</p> <p>17 MS BLACKWELL: What would have been wrong in putting 18 a message out to the firearms officers who were about to 19 perform the interception, to say, "As far as we are 20 aware, it is an imitation firearm, but obviously we 21 cannot be 100 per cent sure"?</p> <p>22 A. In my mind, that would have disproportionately increased 23 the risk to them.</p> <p>24 Q. What about the risk to those inside the vehicle?</p> <p>25 A. That obviously was a consideration of mine, and</p> <p style="text-align: center;">Page 200</p>

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<p>1 obviously the use of the tactic of extraction mitigates 2 that risk, obviously it was -- that doesn't allow for 3 the possibility of that vehicle breaking out and 4 a high-speed chase across London. It negates the 5 possibility of the occupants of that vehicle running 6 away and having various high speed foot chases through 7 residential areas. It mitigates the opportunity for 8 them to arm themselves. It also allows for the option 9 of less-lethal options. 10 So, in terms of the risk to them, that was always 11 a consideration of mine. 12 Q. All right. 13 I just want to look for a moment at COP23, and 14 page 13. This is the code of ethics: 15 "I will only use force as part of my role and 16 responsibilities and only to the extent that it is 17 necessary, proportionate and reasonable in all the 18 circumstances." 19 This is relevant to the officers on the ground but 20 you were commanding this operation, weren't you, 21 Mr Williams? 22 A. I was, yes. 23 Q. Did you have this section of the code of ethics in mind 24 when you took the decision not to disseminate the 25 information about the imitation firearm?</p> <p style="text-align: center;">Page 201</p>	<p>1 A. I had the code of ethics in my mind at all times as part 2 of the national decision model, it was the core element 3 of the national decision model. 4 Q. And sits at the centre of it, doesn't it? 5 A. Absolutely, yes. 6 Q. Could we now look at COP32, please, at page 8: 7 "Human Rights Act considerations: the following 8 considerations will assist in ensuring that the 9 principles of accountability, legality, necessity and 10 proportionality are addressed in respect of any action 11 being considered. 12 "What is my objective? Is what I am doing 13 proportionate? Do I have a lawful power? Is there 14 a legal basis to my action? Is the proposed action 15 relevant and necessary? Is there a reasonable 16 relationship between the aim to be achieved and the 17 means used? Is there a less intrusive alternative? Can 18 the objective be achieved with less impact on the rights 19 of the subject and any others likely to be affected by 20 the action?" 21 I think there is one more over the page, Mr Coates. 22 Thank you: 23 "Is the operation being planned to minimise to the 24 greatest extent possible recourse to the use of lethal 25 force?"</p> <p style="text-align: center;">Page 202</p>
<p>1 Was there a less-intrusive alternative in your mind 2 to that which you were authorising? 3 A. No, there was not. All the way through this operation, 4 from first meeting on 10 November, our consideration 5 was: was there any alternative options we could do, 6 undertake, to deliver the objective of sustained public 7 protection? 8 Following 10 November, we then continued to assess 9 these opportunities, there were none by the time we 10 deployed on 11 December. Look at the FA2, the 11 overarching priority is the preservation of life. If 12 you look at my operational log on the day, it is all 13 about control, it is not about evidence, it is about 14 minimising risk. 15 The decisions that I have taken, hopefully I have 16 explained throughout the course of my evidence, were all 17 about reducing risk and being necessary to deliver the 18 sustained public protection that we sought and that was 19 evident right up to the extraction that was asked -- 20 that I asked the officers to do on behalf of the 21 Metropolitan Police, to deliver that sustained public 22 protection. 23 Q. Could your objective have been achieved with less impact 24 on the rights of the subjects in the Audi? 25 A. No.</p> <p style="text-align: center;">Page 203</p>	<p>1 Q. Was the operation in your view, Mr Williams, planned to 2 minimise to the greatest extent possible recourse to the 3 use of lethal force? 4 A. Absolutely. 5 Q. I am being asked to invite you to read aloud certain 6 pages of the TFC log. 7 Mr Coates, please could we put up MPS3577. 8 Thank you. Pages 2 to 4. 9 Just so that we can remind ourselves what this is, 10 this sits before your written log that we have just been 11 through? 12 A. Yes, so ordinarily if I was maintaining an operational 13 log, this would be it, it would just be a sort of -- 14 this sort of freestyle narrative of the events of the 15 operation, date, time, et cetera. And I would just have 16 continue, continue, continue. 17 This really is I set this out, my opening thoughts 18 about how I was going to conduct the operation on the 19 day. Then, obviously because for reasons I have alluded 20 to with multiple deployments I wouldn't have had the 21 time to write as extensively as I would have done on 22 other operations on this occasion, hence the grid that 23 I drew up. 24 These are my opening thoughts. 25 Q. I am going to invite you to read them into the record,</p> <p style="text-align: center;">Page 204</p>

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<p>1 but before I do that, at what stage on 11 December, or 2 at any time beforehand, did you create this part of the 3 document? 4 A. This was written before obviously I did my log, so it 5 would have been after the briefing. 6 Q. Right, so some time after 5.30? 7 A. The briefing probably finished about 5.10/5.15 -- 8 Q. Yes. 9 A. -- and then I have commenced this, the writing of this. 10 Q. Can I invite you to read it into the record, please? 11 A. Yes: 12 "My overriding principle in terms of this operation 13 is that the preservation of life and the protection of 14 the public, police and subjects known and unknown is 15 paramount at all times. 16 "I recognise my obligation under Article 2 of the 17 Human Rights Act to take preventative operational 18 measures to maximise to the greatest degree possible 19 recourse to lethal operational force. This operation is 20 being conducted by two SFO teams, including CTSTFOs who 21 are highly skilled and highly trained. I have ready 22 access to tactical advice and written tactical advice 23 has provided me with a range of options to ensure this 24 operation is conducted with minimal risk and maximised 25 safety. Whilst the operation is covert, I have the</p> <p style="text-align: center;">Page 205</p>	<p>1 option of switching to overt and one of pure protection. 2 This will maximise the safety of all parties whilst 3 balancing the evidential requirements to reduce the 4 threat posed by the Eren family and their criminal 5 associates NB [and underlined] the need to maximise 6 evidential opportunities is not a determining 7 consideration: 8 "I am satisfied, having applied the national 9 decision model, that the rationale for the deployment of 10 firearms remains valid. I have reviewed whether there 11 is sufficient intelligence or evidence to allow any 12 effective and sustainable action to remove or 13 permanently disrupt this conspiracy." 14 Q. Could we have the next page, please. 15 Thank you. 16 A. "There are none. This remains under review. Ultimately 17 my tactics will be dependent upon events that unfold and 18 the intelligence updates that I receive. I am satisfied 19 that all tactical options available are covered in the 20 SCO19 generic toolboxes, anything further will be 21 dynamically assessed in conjunction with my tactical 22 adviser. I am situated in C3000 control room, where 23 I will have overview of three surveillance radio 24 channels and all intelligence updates. I will have 25 direct lines of communication with my two TFCs on the</p> <p style="text-align: center;">Page 206</p>
<p>1 ground, they will have authority to spontaneously 2 respond to any spontaneous events which may occur. They 3 are supported by two OFCs. With also direct links to 4 the tactical adviser. They will have responsibility of 5 executing my tactical decisions through their respective 6 SFO teams. 7 "I have considered tipping points and it is 8 difficult to be precise prior to the operation with 9 three different surveillance deployments. Ultimately 10 for me it is all about control [underlined]. If at any 11 stage I have the view that I have insufficient control 12 to maximise the safety of all parties, I will revert to 13 overt protection." 14 Q. Next page, please? 15 A. "... even if this is to the detriment of evidential 16 opportunities. At present the threat to all parties is 17 low, this will remain the subject of continuous review. 18 An overall briefing was conducted at 3pm on 10 December, 19 and the individual team briefings this morning at 20 Alperton, Lincoln Road and Holborn and within C3000. 21 The first three have been tape recorded. 22 "The armed operation is ..." 23 I then have to ring up and get an armed operation 24 number and CAD number, as I think I alluded to earlier. 25 And then:</p> <p style="text-align: center;">Page 207</p>	<p>1 "I attach a grid which will be used to record my 2 decision-making process throughout the operation." 3 Q. Right, and that was created in full prior to the time at 4 which we know the Audi probe began at about 6.30? 5 A. That's correct, yes. So it was after I had completed 6 that that I went round and spoke to individual officers 7 in C3000. 8 Q. Thank you. 9 The final questions that I have for you relate to 10 your retirement. 11 I would like to ask you two questions. 12 Firstly, when you decided to retire from the force. 13 Secondly, the date that that retirement took effect, 14 please. 15 A. It was always my intention to retire at completion of my 16 30 years. So I couldn't assist you with a definitive 17 date. 18 Q. All right. 19 A. Obviously as part of the retirement, you have to ask for 20 permission to retire. I can't assist you at the moment 21 as to when that was. May? May/June time. 22 THE CHAIRMAN: It would be in your personnel file, I am 23 sure. 24 MS BLACKWELL: May 2016? 25 A. May or June 2016.</p> <p style="text-align: center;">Page 208</p>

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<p>1 Q. Right.</p> <p>2 A. The reason for that is there is quite a lot of admin to</p> <p>3 do and I wanted to ensure that it was obviously done in</p> <p>4 good time. I didn't want any mistakes and --</p> <p>5 Q. When was the actual date? Can you not help us with that</p> <p>6 either?</p> <p>7 A. I think I was due to retire on 27 September.</p> <p>8 Q. Right.</p> <p>9 A. That was postponed, because obviously the</p> <p>10 Metropolitan Police had allowed me to retire.</p> <p>11 Q. Yes.</p> <p>12 A. And the family were left alone to challenge that.</p> <p>13 Q. Right. But eventually you did retire?</p> <p>14 A. Yes, a week later, so a week after 27 September,</p> <p>15 4 October that would have been. I think that is about</p> <p>16 right.</p> <p>17 Q. We will check on your record, thank you for that.</p> <p>18 A. Yes.</p> <p>19 MS BLACKWELL: Sir, that concludes my questions. I know</p> <p>20 that Mr Butt wishes to address you as to the possibility</p> <p>21 of him asking some additional questions.</p> <p>22 THE CHAIRMAN: In accordance with the protocol, when</p> <p>23 I have -- I am not going to hear you now, Mr Butt,</p> <p>24 because the protocol requires me to rise for five</p> <p>25 minutes in order for counsel for the core participants</p> <p style="text-align: center;">Page 209</p>	<p>1 to discuss issues about which questions may be asked.</p> <p>2 MS BLACKWELL: Yes.</p> <p>3 THE CHAIRMAN: Indeed it may be the case that my permission</p> <p>4 is not required. But any core participant will, I am</p> <p>5 sure, be mindful of the provisions of the regulations</p> <p>6 and also in particular rule 10, and also the protocol,</p> <p>7 which specifies the limited circumstances in which</p> <p>8 questions can be asked.</p> <p>9 I have one question to ask, which I will ask now.</p> <p>10 MS BLACKWELL: Yes, thank you.</p> <p>11 Questions from THE CHAIRMAN</p> <p>12 THE CHAIRMAN: Mr Williams, by the time you called state</p> <p>13 amber, which we know was at 8.57, did there exist after</p> <p>14 7.00 in the morning any up-to-date information, apart</p> <p>15 from that of which you were not aware, but which you</p> <p>16 have agreed pointed away from the ability of the</p> <p>17 conspirators to obtain a real firearm?</p> <p>18 In other words, had anything else come in between</p> <p>19 7.00 and 8.57, to indicate that there was still</p> <p>20 a likelihood of an armed firearm in the car?</p> <p>21 A. No -- in answer to your question, no. Nothing specific.</p> <p>22 THE CHAIRMAN: Thank you.</p> <p>23 That is my question.</p> <p>24 MS BLACKWELL: Then may I invite you to rise for five</p> <p>25 minutes, sir, while we perform the exercise?</p> <p style="text-align: center;">Page 210</p>
<p>1 THE CHAIRMAN: Yes, and then we will see where we go.</p> <p>2 Thank you.</p> <p>3 (4.21 pm)</p> <p>4 (A short adjournment)</p> <p>5 (4.30 pm)</p> <p>6 THE CHAIRMAN: Yes.</p> <p>7 MS BLACKWELL: I think we need to have the witness back, if</p> <p>8 possible.</p> <p>9 THE CHAIRMAN: Do we need not --</p> <p>10 MS BLACKWELL: I don't need to detain you with any aspect of</p> <p>11 application, I have been persuaded by both my learned</p> <p>12 friends Mr Butt and Ms Kaufmann to ask additional</p> <p>13 questions, and I am content to do so.</p> <p>14 THE CHAIRMAN: Very good. Thank you.</p> <p>15 You are both content with that course of action?</p> <p>16 MR BUTT: Yes, sir.</p> <p>17 THE CHAIRMAN: Those witnesses who have not been</p> <p>18 accommodated today, because we have obviously spent</p> <p>19 a significant and justified amount of time with</p> <p>20 Mr Williams, can arrangements be made to accommodate</p> <p>21 them at a date and time to suit their respective</p> <p>22 convenience?</p> <p>23 MS BLACKWELL: Yes, absolutely.</p> <p>24 THE CHAIRMAN: To be advised or do we know now?</p> <p>25 MS BLACKWELL: Thank you, I am helpfully prompted that</p> <p style="text-align: center;">Page 211</p>	<p>1 Ms Blakeney will give evidence tomorrow morning and</p> <p>2 Mr Scammell will be rescheduled.</p> <p>3 THE CHAIRMAN: Thank you very much indeed.</p> <p>4 Sorry you have been kept waiting, Mr Williams.</p> <p>5 A. No problem at all, sir.</p> <p>6 THE CHAIRMAN: Thank you.</p> <p>7 MS BLACKWELL: Mr Williams, I have a series of discrete</p> <p>8 questions which I am invited and more than happy to ask</p> <p>9 you.</p> <p>10 They may seem a little disjointed, I apologise for</p> <p>11 that but --</p> <p>12 A. No problem at all. It is that time of day, I am a bit</p> <p>13 disjointed too.</p> <p>14 Q. If you can concentrate on them as best you can and we</p> <p>15 will get through as quickly as we can.</p> <p>16 First of all, I am invited to take you to some</p> <p>17 aspects of the transcript of the probe which we haven't</p> <p>18 yet looked at, for you to consider if you had been told</p> <p>19 of these aspects what effect that would have had on you.</p> <p>20 Please could we put up, Mr Coates, MPS691, page 12.</p> <p>21 If we look towards the bottom of that page, we can</p> <p>22 see at 07.18.55 the following:</p> <p>23 "It is only because he knows yeah that I have rid</p> <p>24 out with him with a burner and me and you ride ... you</p> <p>25 know what, me and him always take the burner, me and</p> <p style="text-align: center;">Page 212</p>

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<p>1 you, get me ... get me, that is the only reason why 2 I come, that is the reason why Ozzy goes to me, who you 3 going to take with you?" 4 I think that is the end of that particular passage. 5 Let's now go to page 15, please. Just below the 6 middle of the page at 07.25.11, the comment: 7 "When it is life in danger, they are not allowed to 8 do shit." 9 That goes on to the following comment: 10 "A couple of them already told me, yeah, that as 11 soon as they see a gun in their face they put their 12 hands up, straight away doing whatever we want to." 13 So, considering those comments, together with the 14 comment that you have already brought to the attention 15 of the inquiry about boom, boom, which we know was 16 a little after 9.00, if you had heard those aspects of 17 the conversation, what impression would you have been 18 left with? 19 A. Certainly the first one on the preceding page about 20 always riding with burners, in my mind it would 21 corroborate the fact that a team of specific individuals 22 have been recruited. 23 Q. Yes. 24 A. It wouldn't, necessarily, have confirmed in my mind or 25 rebutted in my mind that they were in physical</p> <p style="text-align: center;">Page 213</p>	<p>1 possession of firearms at that stage. Although it is 2 an indication of habitually carrying firearms. 3 Q. Yes. 4 A. In relation to the second page, in my view, it is sort 5 of general conversation about the Serco guards, that 6 they would comply fairly quickly if a firearm of some 7 sort, real or otherwise, was put in their face and 8 obviously -- which is probably commensurate with their 9 instructions that they should not obviously resist. 10 Q. Yes. 11 THE CHAIRMAN: Yes. 12 A. Would it have affected me in my decisions on the day, 13 I suggest not. 14 MS BLACKWELL: Thank you. 15 Was the intelligence received by you at 06.58 16 specific to imitation firearms as opposed to air 17 weapons? 18 A. Imitation firearm is what I remember. 19 Q. The question that I put to you related to the use of 20 a canister in -- I think I described it as an imitation 21 firearm but it was perhaps more properly described as 22 an air weapon. 23 A. Yes, obviously that came a little bit later. There was 24 no indication on the 6.58 intelligence about air 25 weapons, it was just imitation of some sort.</p> <p style="text-align: center;">Page 214</p>
<p>1 Q. Thank you. 2 In our analysis of your handwritten log, we touched 3 upon the difference between what you were told about 4 there being possibly four people in the Audi, and what 5 we see on the transcript, which appears to suggest two 6 people getting out and relieving themselves and then 7 getting back in again, or one or two people. 8 You put great store by the fact that you understood 9 that Ozcan Eren was going to meet the occupants of the 10 Audi and you have explained why that was important to 11 you? 12 A. That's correct, yes. 13 Q. When you received information that it appeared that 14 there might be more people at or getting into the 15 vehicle, why didn't you go into the Covert Monitoring 16 Post and ask to listen to what was going on or to ask 17 further questions about what was being suggested was 18 happening around the vehicle? 19 A. I could have. I think practically I was very keen on 20 getting updates from specifically what the surveillance 21 officers had seen. There was obviously quite a lot 22 going on at that time and then obviously -- after that 23 meeting, obviously I think surveillance officers were 24 also looking for that second car and also the team that 25 was on Ozcan Eren would have been in and around that</p> <p style="text-align: center;">Page 215</p>	<p>1 area as well looking for that car, so there was quite 2 a lot going on. The moment probably passed me by. 3 I could have gone, I could have gone and asked them for 4 a bit of clarity, but things had moved on a little after 5 that. 6 Q. Right, but at no time were you in possession of any 7 information to suggest that he had been there? 8 A. No, obviously there was information from the probe to 9 suggest he was and I think there was intelligence to 10 suggest that he was -- 11 Q. Right. 12 A. -- but no physical sightings to confirm or deny that. 13 Q. No, all right, thank you. 14 I would like to return to the area of firearms 15 enabled, and you have explained what you provided by way 16 of description and authority, and that was gun enabled, 17 to be provided to, as you thought, surveillance 18 officers. 19 Do you appreciate that the officers on the ground, 20 including surveillance and firearms officers, were aware 21 that certain of the information coming to you that 22 morning was coming via the probe in the Audi? 23 A. Certainly the firearms officers and probably the 24 surveillance officers. 25 Q. Would have been aware of that?</p> <p style="text-align: center;">Page 216</p>

<p>1 A. That's correct, yes.</p> <p>2 Q. Because some of the firearms officers were those who had</p> <p>3 been involved in the deployment on 8 December?</p> <p>4 A. That is correct, yes.</p> <p>5 Q. I think part of the intelligence that was provided in</p> <p>6 the 10 December briefing and also the early morning</p> <p>7 briefings on 11 December, included the fact that there</p> <p>8 was a probe in the Audi or something of that nature,</p> <p>9 yes?</p> <p>10 A. Yes, yes, that's correct.</p> <p>11 Q. Did you appreciate that when you gave the authority for</p> <p>12 "gun enabled" to be disseminated, that that may have</p> <p>13 caused the recipients of that information to assume that</p> <p>14 that information had come not from another source of</p> <p>15 intelligence but from the conspirators' mouths</p> <p>16 themselves in the vehicle?</p> <p>17 A. There was a good chance that they would think that --</p> <p>18 Q. Right.</p> <p>19 A. -- but obviously there was obviously the potential for</p> <p>20 other intelligence, so ...</p> <p>21 Q. Yes.</p> <p>22 A. But there was a good chance they would think that, and</p> <p>23 I was aware of that.</p> <p>24 Q. With the knowledge then in your mind that that message</p> <p>25 had gone out at least to some of the officers at about</p> <p style="text-align: center;">Page 217</p>	<p>1 7.30, at the point at which you were prepared to declare</p> <p>2 state amber, did it not occur to you that it was even</p> <p>3 more important, perhaps, to inform them at that stage</p> <p>4 that you had no further intelligence other than the fact</p> <p>5 that the gang had managed to get an imitation firearm?</p> <p>6 A. I was content that the termination that had gone -- the</p> <p>7 term that had gone out, "firearms enabled", was adequate</p> <p>8 to reflect the threat and risk at that time and for me</p> <p>9 to continue to deliver the operation in line with the</p> <p>10 working strategy. I didn't consider that I needed to</p> <p>11 say anything more that would change that.</p> <p>12 Q. It was important, wasn't it, for you to seek to gather</p> <p>13 as much information as possible before authorising</p> <p>14 an interception?</p> <p>15 A. Of course. You want as much information as possible.</p> <p>16 Of course.</p> <p>17 Q. We have explored together the balance between sending</p> <p>18 your surveillance officers out, and obtaining</p> <p>19 information about who was in the vehicle, how many</p> <p>20 people, what they were doing, whether or not there was</p> <p>21 any indication of firearms, et cetera, and protecting</p> <p>22 their covert status.</p> <p>23 But at the time just before state amber was called,</p> <p>24 there had not been an indication to you, a clear</p> <p>25 indication, that those occupants of the Audi at that</p> <p style="text-align: center;">Page 218</p>
<p>1 stage were surveillance aware or were aware that there</p> <p>2 might be officers around and about, was there?</p> <p>3 A. There had been some comments a little while earlier.</p> <p>4 Obviously one of the considerations I had for calling</p> <p>5 state amber was: were the occupants of the vehicle</p> <p>6 particularly agitated? So, for example were they -- was</p> <p>7 that prison van getting very close and therefore they</p> <p>8 were potentially getting into a heightened state of</p> <p>9 anticipation of what they were going to do, which they</p> <p>10 probably would have had to have got themselves mentally</p> <p>11 prepared for that.</p> <p>12 Q. Yes.</p> <p>13 A. So they could have been in a heightened state of</p> <p>14 agitation. So that was something I had to consider, but</p> <p>15 obviously the indication was that that was not the case.</p> <p>16 Q. No.</p> <p>17 A. That they were in quite a relaxed state of mind.</p> <p>18 Q. Yes.</p> <p>19 A. In my view, that was in my favour in terms of mitigating</p> <p>20 risk. And, sorry, could you just repeat the question?</p> <p>21 I have waffled on a bit too much.</p> <p>22 Q. I was talking to you about the balance that you have</p> <p>23 explained to us had to be struck between sending your</p> <p>24 surveillance officers out to obtain as much information</p> <p>25 as possible, as opposed to breaking their cover.</p> <p style="text-align: center;">Page 219</p>	<p>1 Now, in answering that question, or starting to</p> <p>2 answer it, you have referred to the fact that, although</p> <p>3 there had been some information that they were jumpy or</p> <p>4 nervous at some stage or whatever, or aware of</p> <p>5 surveillance, talking about the builders and neighbours</p> <p>6 looking at them. In fact, at the time that state amber</p> <p>7 was called, as we know from the probe, at least one of</p> <p>8 the occupants appears to have been asleep?</p> <p>9 A. I couldn't assist you with that, of what I knew at the</p> <p>10 time, obviously I am aware of that suggestion coming</p> <p>11 afterwards, but I had no indication at the time that</p> <p>12 that was the case. And, in any event, I wouldn't have</p> <p>13 been unduly surprised, obviously --</p> <p>14 Q. At what?</p> <p>15 A. That one or maybe more of the occupants at some stage</p> <p>16 had dozed off.</p> <p>17 Q. Right. Why would that not surprise you?</p> <p>18 A. Well, because you have got three grown men in a car,</p> <p>19 there would obviously ... it could be quite warm in</p> <p>20 there, they are sitting around and waiting. As a police</p> <p>21 officer, you know, if you are out a surveillance and</p> <p>22 waiting for something to happen and an indication</p> <p>23 nothing is going to happen for some time, you know,</p> <p>24 I have dozed off myself, you know, and it is not</p> <p>25 uncommon. But as soon as you get a phone call or</p> <p style="text-align: center;">Page 220</p>

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1 **an update, you spring into life.**
 2 THE CHAIRMAN: Yes.
 3 **A. So that is why it is not uncommon.**
 4 MS BLACKWELL: All right, so finally on that aspect of the
 5 questions, if in your mind at any stage, in the run up
 6 to the interception, those occupants of the Audi were
 7 likely to spring into life and be at a stage of
 8 preparedness in order to go off and attack the van,
 9 would you describe what was about to happen from the
 10 police's perception as more akin to an intervention than
 11 an interception?
 12 **A. No.**
 13 Q. Why not?
 14 **A. Because there is no presence of a third party and the**
 15 **third party was still approximately half an hour away.**
 16 MS BLACKWELL: All right.
 17 Sir, that completes the additional questions.
 18 THE CHAIRMAN: Very good. Thank you very much indeed.
 19 Is it tomorrow morning that you are proposing to
 20 call Mr Scammell at 9.30 or another morning?
 21 MS BLACKWELL: No, Ms Blakeney?
 22 THE CHAIRMAN: Ms Blakeney at 10.00?
 23 MS BLACKWELL: 9.30.
 24 THE CHAIRMAN: 9.30 tomorrow.
 25 MS BLACKWELL: Thank you.

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1 THE CHAIRMAN: I think Ms Blakeney is your witness, Mr Moss.
 2 MR MOSS: Sir, yes.
 3 THE CHAIRMAN: I certainly shall not take it amiss if you
 4 are on your own at that stage.
 5 MR MOSS: Hopefully not entirely on my own, sir.
 6 THE CHAIRMAN: The rest of us will be here anyway.
 7 Thank you very much, Mr Williams.
 8 (4.47 pm)
 9 (The Inquiry adjourned until 9.30 am the following day)
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