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| <p>1 Wednesday, 14 July 2021</p> <p>2 (10.00 am)</p> <p>3 MR MOSS: Good morning, sir.</p> <p>4 The first witness is S111. Can the witness please</p> <p>5 be sworn?</p> <p>6 S111 (sworn)</p> <p>7 Questions from MR MOSS</p> <p>8 MR MOSS: Good morning.</p> <p>9 <b>A. Morning.</b></p> <p>10 Q. Your known by the cipher S111 in these proceedings?</p> <p>11 <b>A. That's correct.</b></p> <p>12 Q. Is it right that you are retired from the</p> <p>13 Metropolitan Police?</p> <p>14 <b>A. Yes, I am.</b></p> <p>15 Q. What was your rank on 11 December 2015?</p> <p>16 <b>A. Police constable.</b></p> <p>17 Q. When did you retire?</p> <p>18 <b>A. 2018.</b></p> <p>19 Q. Did you retire a PC?</p> <p>20 <b>A. Yes, I did.</b></p> <p>21 Q. You started serving in 1986?</p> <p>22 <b>A. Yes, I did.</b></p> <p>23 Q. You started as a firearms officer on the ARVs in 1999, I</p> <p>24 think you did that for four years?</p> <p>25 <b>A. Yes, I did.</b></p> <p style="text-align: center;">Page 1</p>   | <p>1 Q. You then undertook the SFO course and I think you</p> <p>2 carried out the role of a specialist firearms officer</p> <p>3 until 2008?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. After that is it right that you moved into a close</p> <p>6 protection role in 2010?</p> <p>7 <b>A. That is correct.</b></p> <p>8 Q. You went back to work as a SFO?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. And that is where we found you in December 2015?</p> <p>11 <b>A. That's correct.</b></p> <p>12 Q. Is it right that you were also a police medic</p> <p>13 instructor?</p> <p>14 <b>A. Yes, I -- before I became a firearms officer, I was</b></p> <p>15 <b>a national public order instructor, part of my remit</b></p> <p>16 <b>there was to instruct all police officers of all ranks</b></p> <p>17 <b>in all public order tactics and part of my role there</b></p> <p>18 <b>was to train public order medics and also I trained on</b></p> <p>19 <b>the rapid entry intervention course as well.</b></p> <p>20 Q. As well as being trained to train medics, you were</p> <p>21 trained as a police medic in December 2015?</p> <p>22 <b>A. Yes, you had to do the course before you become</b></p> <p>23 <b>an instructor.</b></p> <p>24 Q. In December 2015, I think you had responsibility for</p> <p>25 ensuring that all the team of medics on the SFO teams</p> <p style="text-align: center;">Page 2</p>         |
| <p>1 were up to date with their refresher training?</p> <p>2 <b>A. Yes, I was one of the team medics who, again, you had to</b></p> <p>3 <b>do the course before you became an instructor, you had</b></p> <p>4 <b>to do the first aid at work courses and numerous</b></p> <p>5 <b>ballistic first aid courses. So when the boys and girls</b></p> <p>6 <b>went out to do the work and we came across injured</b></p> <p>7 <b>people with injuries that we could treat them, rather</b></p> <p>8 <b>than the slips, trips and falls that most police</b></p> <p>9 <b>officers get to deal with, because we are in the</b></p> <p>10 <b>firearms environment sometimes we come across people who</b></p> <p>11 <b>have been shot or injured badly so we can treat them as</b></p> <p>12 <b>best we can.</b></p> <p>13 Q. On the spectrum of medical courses and medical training</p> <p>14 across the Metropolitan Police, you as a trained medic</p> <p>15 instructor and a firearms officer, you are at the top</p> <p>16 end of that spectrum, I would have thought?</p> <p>17 <b>A. Yes, we are.</b></p> <p>18 Q. Another feather in your cap, you were an OFC in 2015?</p> <p>19 <b>A. Yes, I was.</b></p> <p>20 Q. Does that have its own training?</p> <p>21 <b>A. Yes, that goes on -- usually it was for sergeants, who</b></p> <p>22 <b>were just -- in the older days as it were it would have</b></p> <p>23 <b>been sergeants in the OFC course but because the team</b></p> <p>24 <b>sergeant is a very, very busy role, they cascade that</b></p> <p>25 <b>training down to more experienced members of the team.</b></p> <p style="text-align: center;">Page 3</p> | <p>1 <b>They go away and do a course and then they qualify as</b></p> <p>2 <b>an OFC and they basically run that element of the team.</b></p> <p>3 Q. How long does that course take?</p> <p>4 <b>A. I couldn't remember. I think it may be a two-day course</b></p> <p>5 <b>with then a refresher course later on every year.</b></p> <p>6 Q. You were up to date with your refresher training in</p> <p>7 December 2015?</p> <p>8 <b>A. Yes, I was.</b></p> <p>9 Q. A couple of questions next about your previous</p> <p>10 experience of firearms operations.</p> <p>11 How many times have you deployed on pre-planned</p> <p>12 firearms operations?</p> <p>13 <b>A. Probably over 1,000, I would imagine.</b></p> <p>14 Q. Have those involved, I am sure, a range of tactics?</p> <p>15 <b>A. Yes, they do.</b></p> <p>16 Q. You say in your statement -- it's the MPS37 statement,</p> <p>17 if you want to look at it but you don't need to:</p> <p>18 "This could range from containment and call out to</p> <p>19 hostage rescues and armed interceptions."</p> <p>20 Is that right?</p> <p>21 <b>A. Yes, and everything in between.</b></p> <p>22 Q. Is it right then that you have been involved in</p> <p>23 containment and call out operations in London in your</p> <p>24 career?</p> <p>25 <b>A. Yes, I have, numerous, but they are on premises.</b></p> <p style="text-align: center;">Page 4</p> |

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| <p>1 Q. Have you ever been involved in a containment and call<br/>2 out operation in those 1,000 firearms operations in<br/>3 respect of a vehicle?<br/>4 <b>A. No, they have been planned for on vehicles ... they have<br/>5 never come to fruition. The reason being you wouldn't<br/>6 do it on a vehicle, as you know you need a sterile area<br/>7 in front of/behind the vehicle which you could never get<br/>8 that in central London. You would always get people<br/>9 coming out to watch, therefore putting them at risk.</b><br/>10 <b>As I said, it has been planned for but only on<br/>11 counter-terrorist operations when we believe that there<br/>12 might be explosives in the car and we, as police<br/>13 officers, don't want to walk up to the car, so we are<br/>14 going to call the subjects away from that car.</b><br/>15 Q. You say central London, but as an officer --<br/>16 <b>A. Or London -- yes, there is nowhere -- I can't think of<br/>17 anywhere where I have done a vehicle stop when<br/>18 a containment could have been in to fulfil all the<br/>19 safety parameters that you need to do it, so -- sorry,<br/>20 members of the public, as soon as you start shouting at<br/>21 a car in London, people come out to start having a look<br/>22 and then I cannot guarantee their safety. I need to put<br/>23 myself or we need to put ourselves in between the<br/>24 subjects and members of the public and we can't do that<br/>25 unless we have a sterile area and you can't physically</b></p> <p style="text-align: center;">Page 5</p> | <p>1 <b>do that in London.</b><br/>2 Q. Were you aware of other constabularies using the tactic<br/>3 across the country?<br/>4 <b>A. Yes, other constabularies do but they are more rural<br/>5 than we are and sometimes they can have possibly<br/>6 a police dog with them as well, which may, if they go<br/>7 running over the fields, as it were, then the police dog<br/>8 can chase them down and tackle them down.</b><br/>9 Q. Obviously we have police dogs in London, but that<br/>10 wouldn't mitigate the other risks you have spoken about?<br/>11 <b>A. No, there's nothing -- nowhere in London I could do<br/>12 a containment and a call out on a vehicle.</b><br/>13 Q. We are now going to move to Operation Ankaa, when did<br/>14 you first become aware of the operation?<br/>15 <b>A. I think I became aware of the operation about<br/>16 4 December, we have a tasking board in our office, which<br/>17 basically, it was a two-week tasking board, so you know<br/>18 what you are doing next Friday for example. There are<br/>19 seven operational firearms teams, so I will know what my<br/>20 team is penciled in for next Friday, basically, and<br/>21 I was at work on the Friday, going to be off for the<br/>22 weekend --</b><br/>23 Q. That is Friday the 4th?<br/>24 <b>A. Friday the 4th, and I think we were penciled in for<br/>25 a confidential operation, because I work very closely</b></p> <p style="text-align: center;">Page 6</p>  |
| <p>1 <b>with my team sergeant, he had informed me it was<br/>2 a confidential operation, he informed me what the<br/>3 outline of the job was, but apart from that, that was<br/>4 all I knew.</b><br/>5 Q. Can you remember what you knew in outline on the 4th?<br/>6 <b>A. Yes, there was going to be an attempted breakout from<br/>7 a Serco van, either on the way to Wood Green Crown Court<br/>8 or once it got to Wood Green Crown Court, some armed<br/>9 subjects were going to try and free an occupant of the<br/>10 prison van, or at court.</b><br/>11 Q. So on Friday the 4th, you were warned about what you<br/>12 were doing at the end of the week after. You are told<br/>13 that limited amount of information and you are warned,<br/>14 are you, to attend a briefing at 3.00 am at Leman Street<br/>15 on Friday morning?<br/>16 <b>A. The time wasn't given to me then. I was on a course on<br/>17 the Monday, Tuesday, Wednesday, on a medics course,<br/>18 a mountaineering medics course, on the Monday, Tuesday<br/>19 and the Wednesday. Returned to work on the Thursday and<br/>20 that is when I was informed, 1, of the briefing at<br/>21 3.00 am but also there was another one on the 10th for<br/>22 firearms commanders that was going to be in<br/>23 New Scotland Yard, the SFOs, the CTSFOs were not to<br/>24 attend that one, it was just somebody from our<br/>25 department was going to represent us.</b></p> <p style="text-align: center;">Page 7</p>   | <p>1 THE CHAIRMAN: Weren't to attend?<br/>2 <b>A. No, we don't -- it was the firearms commanders, sir.<br/>3 They were there and otherwise the CTSFOs were going to<br/>4 get briefed on exactly the same things, 12 to 14 hours<br/>5 apart. It was for people who were not going to be at<br/>6 that 5.00 briefing. So we, as an organisation we would<br/>7 send one representative along. Usually it was an OFC,<br/>8 I couldn't go. S105 couldn't go and I think --</b><br/>9 THE CHAIRMAN: Sorry, why couldn't you go?<br/>10 <b>A. Well, I could have gone, actually, but it was decided --</b><br/>11 THE CHAIRMAN: That is what I thought.<br/>12 <b>A. That W80, he had been on reces beforehand and he knew<br/>13 the majority of the job, so he would go and represent us<br/>14 at this --</b><br/>15 THE CHAIRMAN: Why did you say, "I couldn't go"?<br/>16 <b>A. I think it was because I was going home and getting<br/>17 a period of rest before I was getting up at 1.00 in the<br/>18 morning to come to work. If I had gone to the briefing,<br/>19 I would have then had to drive home in the job vehicle,<br/>20 get home at 7.00 at night and then a period of rest and<br/>21 then come in for 1.00 in the morning.</b><br/>22 <b>So we need periods of rest in between jobs, so<br/>23 because W80 was staying --</b><br/>24 THE CHAIRMAN: In any event, the position is this, that it<br/>25 was a conscious decision not to ask the CTSFOs to go as</p> <p style="text-align: center;">Page 8</p> |

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| <p>1 a group but that one person would represent them at the</p> <p>2 briefing on the afternoon of the 10th?</p> <p>3 <b>A. Correct, sir.</b></p> <p>4 THE CHAIRMAN: Thank you.</p> <p>5 MR MOSS: Forget the practicalities of it for a moment,</p> <p>6 would it have been beneficial if you and W80 had gone to</p> <p>7 the briefing?</p> <p>8 <b>A. No. I would -- I would have heard exactly the same</b></p> <p>9 <b>information again on the Friday morning.</b></p> <p>10 Q. But, for example, were you deprived of the opportunity</p> <p>11 to ask questions, because you weren't there, you were</p> <p>12 only hearing it secondhand?</p> <p>13 <b>A. I think all our questions were already answered and W80</b></p> <p>14 <b>is a very experienced officer, so any questions I would</b></p> <p>15 <b>have probably thought of, he would have thought of as</b></p> <p>16 <b>well.</b></p> <p>17 Q. You said that if you had gone to the briefing, you would</p> <p>18 have had to go home in a job vehicle. We will take this</p> <p>19 in stages, you did go home in a job vehicle, I think,</p> <p>20 didn't you?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. You were on shift from 8.00 till 4.00 that day?</p> <p>23 <b>A. Yes, it was 8.00 till 4.00 on paper. You came in, you</b></p> <p>24 <b>did what you had to do to prepare for the job the next</b></p> <p>25 <b>day, make sure that all your kit is in the right place,</b></p> <p style="text-align: center;">Page 9</p> | <p>1 <b>the staffing-up request, make sure everyone was warned</b></p> <p>2 <b>to attend at 3.00 am for the briefing and then you left</b></p> <p>3 <b>as soon as your jobs were complete, so on paper it was</b></p> <p>4 <b>probably shown 8 to 4, but probably we left at maybe</b></p> <p>5 <b>1.00 or 2.00 in the afternoon.</b></p> <p>6 Q. We have heard evidence from an officer who said that</p> <p>7 they were in a hotel room, I think from about 1.00 or</p> <p>8 2.00 in the afternoon?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. To get their rest, near to Leman Street, but my</p> <p>11 understanding of the evidence of that officer was that</p> <p>12 they were also on stand by. Should something happen in</p> <p>13 London, they were ready to be deployed?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. But you were not -- I am not going to ask you where you</p> <p>16 live, but you were at home with the covert vehicle from</p> <p>17 about 1.00/2.00 onwards?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. If the briefing had been between 8.00 am and 4.00 pm,</p> <p>20 would you have gone to it?</p> <p>21 <b>A. On the 10th?</b></p> <p>22 Q. On the 10th.</p> <p>23 <b>A. Yes, if it was in the morning of the 10th, yes,</b></p> <p>24 <b>probably.</b></p> <p>25 Q. You would have gone with W80 as well?</p> <p style="text-align: center;">Page 10</p>  |
| <p>1 <b>A. Yes, possibly both of us could have gone, yes.</b></p> <p>2 Q. On 11 December, you get into the covert vehicle that you</p> <p>3 had at home and you drive to Leman Street?</p> <p>4 <b>A. Yes, correct.</b></p> <p>5 Q. I think you pick up two colleagues on the way, W112 and</p> <p>6 R116?</p> <p>7 <b>A. Actually I got W112 and P2 mixed up, so it's P2 I pick</b></p> <p>8 <b>up and R116.</b></p> <p>9 Q. You get to Leman Street at 2.15 in the morning?</p> <p>10 <b>A. That's correct.</b></p> <p>11 Q. Did you receive then a tactical briefing at 3.00 am?</p> <p>12 <b>A. Yes, we did.</b></p> <p>13 Q. That was a briefing given by V64, W97 and W80?</p> <p>14 <b>A. Correct.</b></p> <p>15 Q. What understanding did you form of the operation after</p> <p>16 that briefing?</p> <p>17 <b>A. That it was an operation that was looking good in our</b></p> <p>18 <b>terms, so the subjects said they were going to commit</b></p> <p>19 <b>the crime on the Friday, we had everyone in place and</b></p> <p>20 <b>that the Serco van was going to leave Wood Green with</b></p> <p>21 <b>the subjects or one of the subjects on board -- sorry,</b></p> <p>22 <b>one of the inmates on board who was going to be rescued,</b></p> <p>23 <b>rescued? Was going to be freed, and the job was going</b></p> <p>24 <b>to go ahead.</b></p> <p>25 Q. Could we please look at MPS37, page 2, this is your main</p> <p style="text-align: center;">Page 11</p>             | <p>1 witness statement we have in the bundle. We are looking</p> <p>2 at the bottom of page 2 and I am going to read out</p> <p>3 a couple of sentences and then ask you a question about</p> <p>4 them.</p> <p>5 <b>A. Which tab is this, sorry?</b></p> <p>6 Q. I believe it is tab 2.</p> <p>7 Yes, tab 2, page 2. The penultimate line:</p> <p>8 "W80 explained what would happen if people went to</p> <p>9 that vehicle and it was believed they had firearms with</p> <p>10 them. W80 went through where we would hold up, what</p> <p>11 were [over the page] in that area, was the road wide</p> <p>12 enough to get two vehicles side by side and other</p> <p>13 contingencies pertinent to this operation. Also at the</p> <p>14 briefing we were given our deployments for this</p> <p>15 operation."</p> <p>16 What would happen if you went to the vehicle and</p> <p>17 believed there were firearms in it?</p> <p>18 <b>A. This relates to the vehicle that was parked up in</b></p> <p>19 <b>Eastern Road and if we had information that we had</b></p> <p>20 <b>identified the occupants going to that vehicle, and they</b></p> <p>21 <b>were armed and the TFC decided that they wanted those</b></p> <p>22 <b>people arrested, or stopped, in that vehicle, in that</b></p> <p>23 <b>car park, we got the briefing of how that would look, so</b></p> <p>24 <b>he told us what the kind of car park looked like, where</b></p> <p>25 <b>in the car park the vehicle was, so we had the</b></p> <p style="text-align: center;">Page 12</p> |

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| <p>1 contingency to go and detain the people of that vehicle</p> <p>2 before it moved off from Eastern Road.</p> <p>3 Q. After your 3.00 am briefing, you then get kitted up?</p> <p>4 A. Yes, we did.</p> <p>5 Q. With what equipment?</p> <p>6 A. I then go out and draw out my weapons from the armoury,</p> <p>7 which was a Glock --</p> <p>8 Q. Middle of page 3 of your statement if you want</p> <p>9 a reference, but we can take it off the screen, please.</p> <p>10 A. So a Glock with 45 rounds of ammunition, my MCX carbine,</p> <p>11 that has 160 rounds of ammunition, four distraction</p> <p>12 grenades, radios and this is all my personal equipment.</p> <p>13 Then booked out the car kit, which is a separate</p> <p>14 bag, and Taser, and a Hatton gun.</p> <p>15 Q. A distraction grenade is not a CS canister, those are</p> <p>16 different things?</p> <p>17 A. No, a distraction grenade is -- it is a grenade which</p> <p>18 when pulled the pin and thrown, it is six loud, very,</p> <p>19 very loud bangs and six very bright flashes.</p> <p>20 Q. Did you have a CS canister, or more than one?</p> <p>21 A. No, they are in the -- I can't remember in the car kit</p> <p>22 bag, we may have CS grenades in the car kit bag, that is</p> <p>23 just an extra bag we carry in the car, it has extra</p> <p>24 rounds, extra distraction grenades and may have CS</p> <p>25 grenades -- we have got CS canisters in the shotgun</p> <p style="text-align: center;">Page 13</p> | <p>1 rounds as well.</p> <p>2 Q. You say in your statement, "I also booked out the car</p> <p>3 kit" and you describe that as having a Taser with four</p> <p>4 cartridges and a Hatton gun with 20 shotgun cartridges,</p> <p>5 so that is where the CS grenades would be if you had</p> <p>6 them?</p> <p>7 A. Yes.</p> <p>8 Q. You say you had your medic kit with you, I am not going</p> <p>9 to ask you to list every item, but what sort of things</p> <p>10 are in there --</p> <p>11 A. In the medic kit there is oxygen, there is tourniquets,</p> <p>12 there are various dressings, there is special bandages</p> <p>13 which have a clotting agent which you can pack into</p> <p>14 wounds which stop bleeding, we have got nasal and oral</p> <p>15 airways that we can put into people to keep them able to</p> <p>16 breath for as long as possible, a defibrillator, gloves,</p> <p>17 sterile wipes ...</p> <p>18 Q. We have heard there is a medic kit I think in the rear</p> <p>19 right of every vehicle, so everybody knows where to find</p> <p>20 it?</p> <p>21 A. That was the medic kit I was describing. A lot of</p> <p>22 people carry their own smaller medic kit on them. Again</p> <p>23 that is going to have tourniquets, airways and</p> <p>24 dressings.</p> <p>25 Q. Is everyone trained to use the smaller kit with them but</p> <p style="text-align: center;">Page 14</p>  |
| <p>1 only you are trained to use everything in the bigger</p> <p>2 kit?</p> <p>3 A. Correct.</p> <p>4 Q. In the car kit there is one Taser, four cartridges, is</p> <p>5 that right, there is just one Taser between all officers</p> <p>6 in the car?</p> <p>7 A. Yes.</p> <p>8 Q. So you leave and you form a convoy from Leman Street,</p> <p>9 and you drive to the Lincoln Road Patrol Base and get</p> <p>10 there for a 5.00 am briefing?</p> <p>11 A. That's correct.</p> <p>12 Q. When you get there, is it right that you spoke with</p> <p>13 DI Keely Smith, who you refer to as FE1 in your</p> <p>14 statement?</p> <p>15 A. Correct.</p> <p>16 Q. This is at 4.50 in the morning?</p> <p>17 A. Correct.</p> <p>18 Q. You say in your statement:</p> <p>19 "DI Keely Smith, who told us that the operation was</p> <p>20 looking and both the governor of Wormwood Scrubs and the</p> <p>21 judge of the Crown Court were aware."</p> <p>22 Is that right, that was your recollection?</p> <p>23 A. Yes.</p> <p>24 Q. Then there is another briefing at 5.00 am?</p> <p>25 A. Correct.</p> <p style="text-align: center;">Page 15</p>   | <p>1 Q. What was the purpose of that second briefing?</p> <p>2 A. That was a main briefing, that's when all the</p> <p>3 intelligence was outlined by the intelligence officer</p> <p>4 who I can't remember his name -- I think it was</p> <p>5 a DC Kinch, I think. He gives us the intelligence</p> <p>6 briefing, also at that briefing were all the</p> <p>7 surveillance officers. So we then get to see the</p> <p>8 surveillance officers, they get to see us, and we get</p> <p>9 then our firearms warnings and also S105 would then</p> <p>10 explain the firearms tactics and what is expected if any</p> <p>11 incident was to happen.</p> <p>12 Q. You describe it in your statement as an overview of the</p> <p>13 tactics from 105?</p> <p>14 A. Yes.</p> <p>15 Q. Is it detailed or is it just an overview?</p> <p>16 A. It is just an overview.</p> <p>17 Q. What car were you posted to?</p> <p>18 A. I was in the Alpha Car.</p> <p>19 Q. What does the Alpha Car do, what is its role?</p> <p>20 A. Basically the Alpha Car, I am the OFC in the Alpha Car</p> <p>21 and basically I would need to make sure that the team is</p> <p>22 in the right position at the right time to do their job,</p> <p>23 I've got to work out where the subjects are, and</p> <p>24 I maintain a distance short enough so we can react if</p> <p>25 need be, but long enough so we cannot be seen, and we</p> <p style="text-align: center;">Page 16</p> |

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| <p>1 need to juggle, make sure basically we can stay<br/>2 together, the convoy stays together, if it is<br/>3 a surveillance operation I need to -- as with W80 in the<br/>4 back, we will both have maps with us and it is our job<br/>5 to move the team throughout London to get us to the<br/>6 right place.</p> <p>7 Q. You are with W80, who is in the back of the vehicle?<br/>8 A. Correct.</p> <p>9 Q. You are in the passenger seat --<br/>10 A. Front passenger seat, yes.</p> <p>11 Q. -- the maps position, and R116 in the driving seat?<br/>12 A. Yes, he is driving, yes.</p> <p>13 Q. You told us about the intelligence that you were aware<br/>14 of back on 4 December. What intelligence were you aware<br/>15 of after all of these briefings at 5.00 am?<br/>16 A. Just that the people who were being produced at court<br/>17 had been arrested with loaded firearms, one of which was<br/>18 an automatic pistol. One was -- one of them was<br/>19 a Skorpion machine pistol. They were being produced at<br/>20 court and that the rest -- or the, sorry, other members<br/>21 were coming to try and break him out.</p> <p>22 Q. What view did you form when told that one was<br/>23 an automatic pistol and the other was a Skorpion machine<br/>24 pistol, did that impact your thinking in any way?<br/>25 A. Skorpion machine pistol is -- I am not a firearms</p> <p style="text-align: center;">Page 17</p> | <p>1 instructor, I never was a firearms instructor, but<br/>2 I know what a Skorpion machine pistol is, it fires<br/>3 a huge amount of rounds in a fraction of a second, so it<br/>4 is a devastating weapon to be on the streets of London,<br/>5 so if they were arrested with those firearms with them,<br/>6 then the possibility is, if the people coming to try and<br/>7 free them today have got similar equipment, then it<br/>8 could be very devastating if used.</p> <p>9 Q. Were you given any indication whether the people coming<br/>10 to free him today did have similar equipment?<br/>11 A. Not at that time in the briefing, I am not sure. But<br/>12 obviously later on we received some information.</p> <p>13 Q. Jumping to that later on moment, did you understand that<br/>14 the people in the vehicle did have similar weapons to<br/>15 the ones that you have just heard about?<br/>16 A. Well, they had firearms. They had firearms, real<br/>17 firearms, was what the interpretation I received, or<br/>18 I got, from "firearm enabled" so I decided that, yeah,<br/>19 they had weapons to use.</p> <p>20 Q. When you heard the firearms enabled transmission, we<br/>21 will come to it in more detail in a bit, did you think<br/>22 probably that is the automatic pistol, the Skorpion<br/>23 machine pistol that I have already heard about?<br/>24 A. No, I didn't put a name to the firearm or a type of --<br/>25 I just thought firearm.</p> <p style="text-align: center;">Page 18</p> |
| <p>1 THE CHAIRMAN: You said you thought real?<br/>2 A. Yes.</p> <p>3 THE CHAIRMAN: Yes.</p> <p>4 MR MOSS: Rewinding then to what you knew after the 5.00 am<br/>5 brief, I think you also knew, and I am not going to ask<br/>6 you to confirm them, the details of the observation<br/>7 posts that were in place?<br/>8 A. Yes, I did.</p> <p>9 Q. You also knew there was a listening device in the car?<br/>10 A. Correct.</p> <p>11 Q. At the bottom of page 3 of your statement, we don't need<br/>12 it on the screen, but in case you want to look at it,<br/>13 you say:<br/>14 "It was also intimated to us that the subject's<br/>15 brother was going to take part in this operation."<br/>16 Do you remember that?<br/>17 A. Yes.</p> <p>18 Q. Intimated, maybe I am reading too much into the word, it<br/>19 implies it was not actually said to you, but it was your<br/>20 understanding?<br/>21 A. Yes, it was my understanding that he was going to be<br/>22 brought along and -- yeah, I will just leave it at that.<br/>23 We thought he was going to come along. On my one,<br/>24 I think I have put in something here which is sensitive,<br/>25 but we thought he was the armourer and he was the one</p> <p style="text-align: center;">Page 19</p>   | <p>1 that provided the weapons beforehand.</p> <p>2 Q. Would it have assisted you to have been informed that<br/>3 from 29 October to 11 December of that year, the gang<br/>4 had attempted to source real firearms and ammunition?<br/>5 A. Yes, it probably would have done.</p> <p>6 Q. Why?<br/>7 A. Because we know they are out looking for firearms and<br/>8 then if we get the report that they have found some, it<br/>9 is only going to add more intelligence to the big<br/>10 intelligence picture that we are putting together.</p> <p>11 Q. Would it have assisted you to know that as of the night<br/>12 before, 10 December, intelligence suggested that only<br/>13 an imitation firearm had been sourced?<br/>14 A. No, I don't think it would have.</p> <p>15 Q. Why not?<br/>16 A. Like I said it is just suggested. Until I see the<br/>17 firearm and it is in my hands, I have got no idea if it<br/>18 is fake or real, so -- if they are in possession of<br/>19 a firearm and if they do anything with that firearm,<br/>20 then I am just going to think it is real.</p> <p>21 Q. When you heard the "firearms enabled" transmission that<br/>22 you have already mentioned, you said you thought that<br/>23 meant real firearms?<br/>24 A. Yes.</p> <p>25 Q. Did you have an understanding of the number of firearms</p> <p style="text-align: center;">Page 20</p>   |

1 in the vehicle?  
 2 **A. No.**  
 3 Q. Did you have an understanding of the reliability of the  
 4 intelligence that the offence would be firearms enabled?  
 5 **A. Only because it came from the probe in the car. So**  
 6 **obviously 3000 are then getting that information and**  
 7 **they were passing it down the line, so that was a good**  
 8 **bit of intelligence to get.**  
 9 Q. What did that information do to your personal threat  
 10 assessment?  
 11 **A. It didn't change it initially at that point.**  
 12 Q. It didn't change it?  
 13 **A. No, because I am thinking it is an armed gang and we are**  
 14 **there because the TFC and the SFC has thought that they**  
 15 **pose such a risk that they need to be dealt with by**  
 16 **armed police officers.**  
 17 Q. It didn't change it initially. Did it change it at any  
 18 point?  
 19 **A. Well, I might be jumping ahead here, but if you are**  
 20 **walking up or you are running up to a car and there is**  
 21 **potentially guns inside, then your risk assessment is**  
 22 **going to be fairly high.**  
 23 Q. You say in your witness statement, MPS2795, tab 4,  
 24 page 1 that it increased your threat assessment, but is  
 25 it your evidence now that it didn't?

Page 21

1 **you cannot function properly. And it is an advantage to**  
 2 **police, because we would go into that area and we would**  
 3 **be wearing respirators, so it wouldn't affect us.**  
 4 Q. The CS that you can fire from a shotgun, it would have  
 5 the same effect, would it, as the CS that a uniformed  
 6 officer has on their belt?  
 7 **A. Yes.**  
 8 Q. Would it have any use in respect of a vehicle?  
 9 **A. You could fire it into a vehicle. But then again,**  
 10 **you -- that vehicle can just open the windows and drive**  
 11 **off, and then it has no effect whatsoever. Because you**  
 12 **are letting air flush through the system and that is**  
 13 **going to get rid of the CS.**  
 14 Q. Do you accept that it is a relatively common tactic,  
 15 leaving aside firearms operations for a moment, that it  
 16 is not unheard of for uniformed officers when trying to  
 17 get somebody out of a vehicle or arresting someone who  
 18 is struggling in a vehicle, to deploy the CS from their  
 19 belt?  
 20 **A. Yes, they have done that in the past, yes.**  
 21 Q. You finished your 5.00 am briefing, did you then move to  
 22 the Quicksilver Patrol Base?  
 23 **A. Yes, we did.**  
 24 Q. While you were there, did you receive surveillance  
 25 updates?

Page 23

1 **A. We expected firearms to be in place because we were in**  
 2 **a firearms operation. I think -- I don't think --**  
 3 **I think it may have -- I then thought that the firearms**  
 4 **were definitely going to be used, where before may be**  
 5 **used.**  
 6 Q. Thinking again about the equipment you had available to  
 7 you, going back to the CS grenades as you call them,  
 8 canisters as I call them, are we talking about the same  
 9 thing?  
 10 **A. No, different things.**  
 11 Q. What is the difference?  
 12 **A. See I can't remember if we had CS grenades with us -- it**  
 13 **is six years ago for me and I can't remember. We**  
 14 **definitely had CS cartridges that can be deployed via**  
 15 **shotgun, so you can fire CS into a place.**  
 16 Q. You did have those in December 2015?  
 17 **A. Yes.**  
 18 Q. Did you have them on you on that day?  
 19 **A. They would have been part of the car kit.**  
 20 Q. When are they to be used?  
 21 **A. They are to be used when you want to incapacitate people**  
 22 **in a building or if you are assaulting a building and**  
 23 **you want to make it as difficult for people as possible.**  
 24 **CS if -- unless you know, it is a very uncomfortable**  
 25 **gas, you breathe it in and you cannot see properly and**

Page 22

1 **A. Yes.**  
 2 Q. Can you remember what information you received?  
 3 **A. That people had approached the vehicle that was parked**  
 4 **in Eastern Road and the vehicle was now two up and**  
 5 **driving around, I believe.**  
 6 Q. Were you also told it was driving erratically and  
 7 quickly --  
 8 **A. Yes.**  
 9 Q. -- and in the area of Wood Green Crown Court?  
 10 **A. Correct.**  
 11 Q. Were you given intelligence about any other vehicle  
 12 apart from the Audi A6 mission vehicle? Page 4 of your  
 13 main statement.  
 14 **A. Yes.**  
 15 **Yes, later on we got it was then driving in convoy**  
 16 **with an Audi A3, and that is when they went to an area**  
 17 **near a school with some astroturf and two people got**  
 18 **from out of the A3 and they moved into the car with the**  
 19 **probe.**  
 20 Q. The A6 mission vehicle?  
 21 **A. The A6.**  
 22 Q. So how many people did you understand to be in the  
 23 mission vehicle at that point?  
 24 **A. Four.**  
 25 Q. When did you leave the Quicksilver Patrol Base?

Page 24

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|--|--|
| <p>1 Is it right it was around the time that the van was<br/>2 leaving Wormwood Scrubs?<br/>3 <b>A. Oh yes.</b><br/>4 Q. Had you moved as far as Mayes Road, you say?<br/>5 <b>A. Yes.</b><br/>6 Q. If we please look at MPS1293, it is a map that the<br/>7 chairman has seen before but, S111, you probably haven't<br/>8 seen it before. If we could please zoom in on the area<br/>9 around where we see the Crown Court labelled, but also<br/>10 slightly to the left of that, where we see "Wood Green"<br/>11 written in capitals. If you take a moment, S111, to get<br/>12 your bearings.<br/>13 <b>A. Yes, okay.</b><br/>14 Q. You see Wood Green Crown Court is labelled?<br/>15 <b>A. Yes.</b><br/>16 Q. If you then see the words "Wood Green Crown Court in<br/>17 that white box, and you move to the left of that, you<br/>18 can see what seems to be a college and a primary school.<br/>19 I think Quicksilver is to the left of that, it's in that<br/>20 area.<br/>21 <b>A. Okay.</b><br/>22 Q. Then can you see to the right of that college, Mayes<br/>23 Road?<br/>24 <b>A. Yes, I can see Mayes Road.</b><br/>25 Q. You have moved from Quicksilver on to Mayes Road there?</p> <p style="text-align: center;">Page 25</p>   | <p>1 <b>A. Yes.</b><br/>2 Q. You said you were near where it joins Lordship Lane or<br/>3 pointing towards Lordship Lane, I am not quite sure<br/>4 where that would be, could you identify where that is on<br/>5 the map?<br/>6 <b>A. I think we were at Mayes Road and we turned right into<br/>7 Station Road and I think we may have, in that<br/>8 locality --</b><br/>9 Q. You are on Mayes Road going north, going straight up the<br/>10 map as we look at it?<br/>11 <b>A. Straight up the map and then I think at the roundabout,<br/>12 I am pretty sure we do a right into Station Road.</b><br/>13 Q. Before you do all that, you wait in Mayes Road for about<br/>14 30 minutes?<br/>15 <b>A. Yes, we do.</b><br/>16 Q. When you are there, do you ask the surveillance units<br/>17 for more information?<br/>18 <b>A. Yes.</b><br/>19 Q. What information do you request?<br/>20 Is it right you wanted to know the exact location of<br/>21 the mission vehicle?<br/>22 <b>A. Yeah, that is correct.</b><br/>23 Q. Why would you want to know that?<br/>24 <b>A. If the vehicle has come to a stop, then we can start<br/>25 making plans as to what to do with that vehicle. If the</b></p> <p style="text-align: center;">Page 26</p>  |
| <p>1 <b>TFC decides, right, they have got enough evidence, so go<br/>2 forward and stop that vehicle.</b><br/>3 Q. Did you start making plans?<br/>4 <b>A. Well, we did start -- we started having a look at the<br/>5 area in and around it on Google Maps. To see exactly --<br/>6 so we could ... rather than driving into the area, so we<br/>7 had as much information about the area as possible.</b><br/>8 Q. You are talking now in terms of we did this, and we<br/>9 started doing that, but in your witness statement you<br/>10 say, "I formulated a plan". Is that accurate?<br/>11 <b>A. Yes, I formulated -- when it comes to down the stopping<br/>12 of the vehicle, then S105 would say, right, can we go<br/>13 and stop this vehicle, it is up to me to then have<br/>14 decided what -- how to stop the vehicle, if it needs<br/>15 stopping, and just to make sure that Alpha, Bravo and<br/>16 Charlie are aware what we are going to do.</b><br/>17 Q. So it is for you to determine not only what the Alpha<br/>18 Car will do, but the Bravo and Charlie cars as well?<br/>19 <b>A. Yes.</b><br/>20 Q. I am going to ask you now to describe the plan which you<br/>21 conceived, and in case it helps, if we could please have<br/>22 MPS4504, page 11, on screen, which is not a document in<br/>23 your bundle, but it is an image which might help.<br/>24 Again, a moment to orientate yourself, you will see here<br/>25 this is an overview of where the Audi is and where the</p> <p style="text-align: center;">Page 27</p> | <p>1 silver BMW is parked next to it.<br/>2 Obviously when you are sitting in Mayes Road for<br/>3 those 30 minutes you don't have an overview such as<br/>4 this, but this is the scene you did eventually come to.<br/>5 What was the plan you conceived, where were the<br/>6 Alpha, Bravo, Charlie cars to be positioned?<br/>7 <b>A. What we tried to do is not to alert any subjects that<br/>8 are in the vehicle that we are coming, basically. So we<br/>9 want as few police around that area as possible. They<br/>10 are settled there and they have been there for a little<br/>11 while, because I have asked for updates from the<br/>12 surveillance officers and they have told us that the car<br/>13 is parked and that the windows have steamed up.</b><br/>14 <b>So I run a plan through 105, which I think is a good<br/>15 plan, I have told him what I want to happen is we need<br/>16 to block that vehicle in, deploy around the vehicle and<br/>17 extract the occupants. So what I want to do is put<br/>18 Alpha -- so we are just driving up the road nice and<br/>19 easily, as if we are normal, normal kind of road users,<br/>20 the last thing we want to do is go in there quickly and<br/>21 start screeching tyres --</b><br/>22 THE CHAIRMAN: Excuse me.<br/>23 <b>A. -- so we pull up nice and gently, as a threesome, I just<br/>24 push past -- Alpha just pushes past the subject vehicle,<br/>25 Bravo is going to stop directly in front of the subject</b></p> <p style="text-align: center;">Page 28</p> |

7 (Pages 25 to 28)

1 vehicle and Charlie is going to stop just kind of  
 2 Olympus Grove side of the vehicle.  
 3 Then Alpha can deploy to, as you look at it, the  
 4 right-hand side of the vehicle, as we look at it.  
 5 Charlie can deploy to the left-hand side.  
 6 And Bravo with the front seat passenger, which is  
 7 the -- which I think was P2, he would just stay in front  
 8 of the vehicle with his weapon pointed at the vehicle.  
 9 That is what we decided to do.  
 10 Q. You said that you had to run this plan through S105?  
 11 A. Yes.  
 12 Q. You were not in the car with S105?  
 13 A. No. No. We were in a convoy of, well, actually of five  
 14 vehicles. He is in the fourth and he has got a huge  
 15 amount to do with talking to the tactical adviser,  
 16 talking to the TFC, so he pushes some decisions on to me  
 17 and that was one of the things, that is what happens, it  
 18 is how we do it.  
 19 The OFC in Alpha decides the tactics but I would  
 20 never decide a tactic without first running it through  
 21 my team leader and I just say, "This seems the simplest  
 22 thing to do", I run it through him. He said, "Yes, I am  
 23 happy with that", and then I just brief Bravo and  
 24 Charlie.  
 25 Q. I want to understand where the responsibility sits for

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1 A. It is his call. Yes.  
 2 THE CHAIRMAN: But you don't expect to disagree when you  
 3 have chatted it through?  
 4 A. Yes, correct, sir.  
 5 THE CHAIRMAN: Yes.  
 6 MR MOSS: When you had the discussion with him about the  
 7 plan you were proposing, was it a private line between  
 8 you or was it on the back-to-back channel?  
 9 A. I phoned him up, I called him.  
 10 Q. So only people in your car and him could hear it?  
 11 A. Yes.  
 12 Q. How did you convey the plan to officers in other cars?  
 13 A. I then phoned up other cars, I phoned up the -- I knew  
 14 where people were sitting in each car, so I phoned up  
 15 Bravo, which is P2 and I phoned up -- this is what  
 16 I believe I did, I phoned up the operator of Charlie as  
 17 well to tell him, "This is what I want you to do".  
 18 Q. When I read your witness statement, it is in your  
 19 statement at tab 6, paragraph 5, you said that you  
 20 briefed the other officers over the radio and I had  
 21 an image of you broadcasting something over the radio  
 22 that everyone listened to all once, am I wrong about  
 23 that?  
 24 A. I think I did both, just to be belt and braces to be  
 25 honest.

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1 making that decision. Was it ultimately your decision  
 2 to make but you wanted to have his blessing or was it  
 3 the other way round?  
 4 A. It is a kind of joint decision, that I don't -- I am not  
 5 going to die in a ditch if he says, "I want to change  
 6 that, I am not happy with that", I will go with it. He  
 7 has the TFC in there, he has the TAC adviser on the  
 8 phone with them, he is an experienced OFC.  
 9 So if he wants to change it, that is not a problem.  
 10 But it seemed the simplest and safest thing to do  
 11 for both parties, was to do this.  
 12 Q. So you would have a lot of deference for his view, but  
 13 you would decide?  
 14 A. Deference is?  
 15 Q. You would take into account his view?  
 16 A. Yes, of course I would, definitely.  
 17 Q. You would give it the respect it deserved, but you would  
 18 decide?  
 19 A. Well, we would have a conversation and then it is not  
 20 a case of, right, I am doing this and you are doing  
 21 that, if he wants to pull rank, if he said, "I want it  
 22 done this way", then we do it his way, but he wouldn't  
 23 do that. We are all very experienced and he was happy  
 24 with what I --  
 25 THE CHAIRMAN: It is his call at the end of the day?

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1 Initially, I may have said to them, this is what --  
 2 this is where the car is, this is what we are thinking  
 3 of doing, and once I probably got the okay from S105,  
 4 then I would have briefed over the radio.  
 5 Q. Did you tell the officers that it would be  
 6 an interception by way of extraction?  
 7 A. No, they would have known purely from the position of  
 8 the vehicles what they were doing. We were not standing  
 9 off the car, as in we were not backing the vehicles away  
 10 from our vehicles, away from him, we were up close and  
 11 personal. So it was always going to be an extraction  
 12 from the car.  
 13 Q. They would know that although containment and call out  
 14 was technically in your menu of options, it was  
 15 something that you would never use?  
 16 A. Correct.  
 17 Q. When you heard the transmission "firearms enabled", you  
 18 said you believed that it indicated a real firearm, did  
 19 you understand that that information came from the  
 20 probe?  
 21 A. Yes.  
 22 Q. Did the fact that the information came from the probe  
 23 affect its weight in your mind?  
 24 A. Yes, it did.  
 25 Q. In what way?

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|---|---|
| <p>1 <b>A. Usually on firearms operations we are second guessing</b><br/> 2 <b>that criminals or subjects are going to come along with</b><br/> 3 <b>firearms, "They may use firearms for this offence" is</b><br/> 4 <b>sometimes what we are told at briefings. But this time</b><br/> 5 <b>because the probe is in the car, 3000 are actually</b><br/> 6 <b>listening to what is said in the car. So they have</b><br/> 7 <b>passed back to us that firearms are going to be used and</b><br/> 8 <b>therefore they must have heard that in the car from the</b><br/> 9 <b>subjects.</b></p> <p>10 THE CHAIRMAN: Was it that which changed your state of mind<br/> 11 from "may" to "definitely"?</p> <p>12 <b>A. Yes, sir.</b></p> <p>13 MR MOSS: We have heard evidence from Bill Scammell, now<br/> 14 a chief inspector, who put the transmission out over the<br/> 15 radio and we have heard that the words he used, and he<br/> 16 was sure about the words he used, were, "Suggests that<br/> 17 it will be firearms enabled".</p> <p>18 Let's look at the hypothetical for a second. What<br/> 19 if the officer had said:<br/> 20 "Intelligence suggests that it will be an imitation<br/> 21 firearm."<br/> 22 What weight would you have given to that<br/> 23 information?</p> <p>24 <b>A. It suggests it might be an imitation, so I can't take --</b><br/> 25 <b>I am not going say it is -- I am not going to think it</b></p> <p style="text-align: center;">Page 33</p> | <p>1 <b>is an imitation, I am going to think it is a real</b><br/> 2 <b>firearm.</b></p> <p>3 Q. The chairman might think there is an inconsistency there<br/> 4 though, because you heard the words "suggests it will be<br/> 5 firearms enabled" and you gave that all the weight in<br/> 6 the world, and yet if the words had been "suggests it<br/> 7 will be an imitation", you are saying you probably would<br/> 8 have disregarded that?</p> <p>9 <b>A. No, I don't disregard information, I disregard that it</b><br/> 10 <b>might be an imitation firearm.</b></p> <p>11 <b>It is a real firearm until I see it is in my hands</b><br/> 12 <b>and I can prove it is different.</b></p> <p>13 Q. After giving the briefing that you did when the cars are<br/> 14 lined up, you then move your cars closer to Wood Green,<br/> 15 you move on to Lordship Lane?</p> <p>16 <b>A. Yes, we do.</b></p> <p>17 Q. We can take that down from the screen now, please.<br/> 18 State amber is given, by whom is it given?</p> <p>19 <b>A. State amber is given by I think the TFC in conjunction</b><br/> 20 <b>with S105, I think it comes -- I think it comes over the</b><br/> 21 <b>radio, "We have got state amber".</b></p> <p>22 Q. Did you discuss the roles that you were going to fulfil<br/> 23 with the two officers in your car, R116 and W80?</p> <p>24 <b>A. Yes, they are both very experienced officers. Yes, we</b><br/> 25 <b>decide just basically where we are going to go, I am</b></p> <p style="text-align: center;">Page 34</p> |
| <p>1 <b>telling R116: are you happy with what you are going to</b><br/> 2 <b>do or where you are going to stop? He is happy.</b><br/> 3 <b>I think we had a brief conversation with W80 that he was</b><br/> 4 <b>not going to take the Hatton gun, because the vehicle</b><br/> 5 <b>was stopped and we were going to block that vehicle in</b><br/> 6 <b>and deploy around the car very quickly, so they wouldn't</b><br/> 7 <b>have a chance to drive off and again we were happy with</b><br/> 8 <b>his rationale for not taking the Hatton gun.</b></p> <p>9 Q. What would have happened if you were not happy with the<br/> 10 rationale?</p> <p>11 <b>A. I would have said no, I think -- if we couldn't have</b><br/> 12 <b>gotten as tight to the vehicle as we were going to, then</b><br/> 13 <b>he would have probably thought, yeah, I will take it</b><br/> 14 <b>anyway.</b></p> <p>15 Q. You are a PC, W80 was a PC, I think R116 was a PC as<br/> 16 well?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. But you were the OFC in the car?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. If you had disagreed with W80's decision, could you have<br/> 21 pulled rank?</p> <p>22 <b>A. Yes, I would -- yes.</b></p> <p>23 Q. To what extent was it discussed, was it just one comment<br/> 24 from W80 and you said "sounds good"?</p> <p>25 <b>A. Yes, sounds good, yes, it is short and brief. There's</b></p> <p style="text-align: center;">Page 35</p>                                 | <p>1 <b>no debate or anything like that, it is commonsensical</b><br/> 2 <b>for us, the vehicle, we were going to block the vehicle</b><br/> 3 <b>in as tightly as we possibly could and deploy around</b><br/> 4 <b>there as quickly as we could.</b></p> <p>5 Q. We fixed three points in time, one when you were sitting<br/> 6 on Mayes Road, one when you move on to Lordship Lane and<br/> 7 one when state amber is called. In relation to those<br/> 8 three points in time, when did that conversation happen?</p> <p>9 <b>A. State amber, I think.</b></p> <p>10 Q. After state amber?</p> <p>11 <b>A. Sorry, in between Mayes -- sorry, Lordship Lane and</b><br/> 12 <b>state amber.</b></p> <p>13 Q. I only ask the question that way because your statement<br/> 14 reads as if it happened after that state amber was<br/> 15 called, did it happen before that or did it happen<br/> 16 after?</p> <p>17 <b>A. I can't recollect the exact time.</b></p> <p>18 Q. Would it be surprising if it happened after, I would<br/> 19 think that you would have wanted to have more time to<br/> 20 have that sort of discussion?</p> <p>21 <b>A. Yes, probably but the vehicle is stationary, hasn't</b><br/> 22 <b>moved for some considerable time, if for some reason the</b><br/> 23 <b>vehicle had started to move off then I imagine we would</b><br/> 24 <b>have probably been called back from state amber and</b><br/> 25 <b>think, right, let's see where this is going to go, and</b></p> <p style="text-align: center;">Page 36</p>   |

1 then we would have maybe followed it, surveillance would  
 2 have conventionally followed it for a while and then we  
 3 would have put in the stop somewhere else.  
 4 THE CHAIRMAN: Was it your understanding that once the TFC  
 5 judged that he had sufficient evidence to make  
 6 an arrest, state amber would be called?  
 7 **A. Yes.**  
 8 THE CHAIRMAN: Thank you.  
 9 MR MOSS: It sounds like you didn't have the conversations  
 10 with R116 and W80 about your roles and choice of weapons  
 11 until the very last minute; is that fair?  
 12 **A. The choice of weapons, we have all got the same weapons,**  
 13 **so I carry my Glock and my MCX, as does W80, as does**  
 14 **116. It is our weapons we book out every day from the**  
 15 **armoury.**  
 16 Q. But there was one Hatton gun in the car?  
 17 **A. There was one Hatton gun, because that -- there is**  
 18 **a team and I wouldn't deploy with that. If anybody was**  
 19 **going to deploy with that, it would be W80.**  
 20 Q. What I am saying is you didn't have the discussion about  
 21 whether someone was going to have that in their hands  
 22 when the cars pulled into Bracknell Close until the very  
 23 last minute?  
 24 **A. Well, it is something -- we don't have to get it out**  
 25 **from an armoury or anything, basically it is sat beside**

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1 vehicle, apart from the ones you have spoken about  
 2 already?  
 3 **A. No.**  
 4 Q. Did you request surveillance updates whilst you were  
 5 moving into Bracknell Close?  
 6 **A. Yes, that is just so, I, that he is aware that we are**  
 7 **coming, 2, that he lets us know any major changes that**  
 8 **are afoot, usually what happens is when it goes to**  
 9 **amber, then surveillance will start giving us**  
 10 **an enhanced commentary as to anything changing in and**  
 11 **around the vehicle and he just came back with I think no**  
 12 **change, it is all good, or words to that effect, and**  
 13 **then he asked me how long we are going to be.**  
 14 Q. He being the officer with eyes on?  
 15 **A. Yes or I think I had spoken to the surveillance**  
 16 **controller who was speaking to his operative, who**  
 17 **I think was on a balcony somewhere.**  
 18 Q. Is it right that the operative would normally give the  
 19 enhanced commentary, wouldn't the OFC usually give it?  
 20 **A. No, because sometimes surveillance are -- for example**  
 21 **this was slightly different as the vehicle is**  
 22 **stationary. Usually if we are following a vehicle and**  
 23 **we want, or there was firearms in that vehicle for**  
 24 **example, we are behind the surveillance and eventually**  
 25 **we get state amber, so we are now going to push up**

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1 him on the chair in the car. It is loose in the car,  
 2 ready to be easily grabbed and easily used. So if one  
 3 second you think am I going to take it or should I leave  
 4 it, it is not as if he needs to open anything up to get  
 5 it out. It is there ready on his lap if required.  
 6 Q. What about the more detailed discussion between you and  
 7 the two other officers about what roles you would carry  
 8 out when you got out of the vehicle, was that at the  
 9 last minute as well?  
 10 **A. No, part of our job as a CTSFO was to be able to kind of**  
 11 **think on our feet and fill the gaps if required, so we**  
 12 **are going to deploy to our side of the vehicle, which is**  
 13 **going to be the passenger side of the vehicle and if for**  
 14 **some reason that I have not fulfilled a role that I am**  
 15 **meant to, then W80 or R116 will fulfil that role.**  
 16 Q. As someone who sat in that car for quite a while that  
 17 morning, could you help the chairman understand W80's  
 18 demeanour during the time from leaving Quicksilver to  
 19 getting into Bracknell Close?  
 20 **A. Normal. No different than any other day. I have known**  
 21 **him for 20 years and he has always been very level**  
 22 **headed, very professional and a really good guy. I am**  
 23 **sorry I can't help you with his demeanour, but that's --**  
 24 **we are all fairly level headed to be honest.**  
 25 Q. Can you remember any particular conversations in the

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1 through the surveillance convoy to get to the subject  
 2 vehicle, and what will start happening is they will give  
 3 us an enhanced commentary, so extra kind of commentary  
 4 as we push through the convoy. And once we are at the  
 5 front of the convoy, then I, as the OFC, will take over  
 6 the commentary.  
 7 Q. When you say "enhanced commentary", is it how we imagine  
 8 a rally car's map reader is?  
 9 **A. No, it just anything that we should know that is**  
 10 **critical, to:**  
 11 **"Right he is now passing the zebra crossing on the**  
 12 **left, he has just gone over the zebra crossing, yes,**  
 13 **he's passing a bus."**  
 14 **Usually surveillance is just done in road names, so**  
 15 **he is passing the High Street on the left-hand side or**  
 16 **the nearside, Brook Close, for example, on the offside.**  
 17 **Now, we need to know exactly in between High Street**  
 18 **and Brook Close where he is, "He is outside the**  
 19 **newsagent, he is now just past the lady with the**  
 20 **umbrella", just so we can then pin it down to exactly**  
 21 **where on that street, so we don't have to go looking for**  
 22 **it. It is there and we can easily pick it out.**  
 23 Q. Do you have experience as an OFC of giving enhanced  
 24 commentaries?  
 25 **A. Yes, I have.**

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|---|--|
| <p>1 Q. Did this officer's enhanced commentary differ from the<br/>2 one that you would have given?<br/>3 <b>A. No.</b><br/>4 Q. Had you planned to take over the commentary or had you<br/>5 planned to leave it to the officer?<br/>6 <b>A. No, usually we -- in a perfect world, I would have come<br/>7 round -- we would have come round the corner and then<br/>8 I would have said, "Okay, state red", and then we would<br/>9 have rolled on and done the stop.<br/>10 Unfortunately that didn't happen -- not<br/>11 unfortunately, just that didn't happen. By the time<br/>12 I put my sling on and located the vehicle I thought<br/>13 there was no need, it doesn't have to be done because --<br/>14 just because I don't say it, doesn't mean the two cars<br/>15 behind me are not going to do exactly as they did.</b><br/>16 Q. Why do you put your sling on at that last moment?<br/>17 <b>A. What I don't want to do is look like a police car to<br/>18 the -- or look like a police officer in a nondescript<br/>19 car to the members of the public. We still didn't know<br/>20 where the third eye was and if for some reason he just<br/>21 popped out of a building beside me and he saw me either<br/>22 in Lordship Lane putting my sling on there, walk past<br/>23 three cars, if might look out of the ordinary.</b><br/>24 Q. Were you confident there was a third eye?<br/>25 <b>A. Yes, we were told there was a third eye, looking up and</b></p> <p style="text-align: center;">Page 41</p> | <p>1 <b>down the road, but just this case there was others that<br/>2 we didn't know about, that someone could have come on to<br/>3 the area on foot and not come in the A6 and he could<br/>4 have just been looking up and down the road. So we had<br/>5 one we believed, I think, was being looked at, but there<br/>6 could have been others.</b><br/>7 Q. Did your CTSFO colleagues know that you were not in<br/>8 a perfect world, to use your words, and that it would be<br/>9 the surveillance operative giving the commentary and not<br/>10 you?<br/>11 <b>A. Yes, it is what is usually done.</b><br/>12 Q. Did you put state red over the radio?<br/>13 <b>A. No.</b><br/>14 Q. Why not?<br/>15 <b>A. I didn't have enough time, and I was -- as soon as we<br/>16 came into Bracknell Close, my attention was then on the<br/>17 Audi to make sure it wasn't going to do anything stupid<br/>18 or start moving off. So I just didn't do it.</b><br/>19 Q. So it is the job of the Alpha OFC to do it?<br/>20 <b>A. Yes.</b><br/>21 Q. Do you think it matters that you didn't do it?<br/>22 <b>A. No.</b><br/>23 Q. Why not?<br/>24 <b>A. I, that we all knew what we were doing anyway, in Alpha,<br/>25 Bravo and Charlie, and it was only to let the</b></p> <p style="text-align: center;">Page 42</p>   |
| <p>1 <b>surveillance know that the actual -- the stop was going<br/>2 to go in and I was hoping that the surveillance officer<br/>3 on the balcony would probably give a long running<br/>4 commentary of what exactly was happening anyway, so it<br/>5 would all be going over the Airwaves what we were doing.</b><br/>6 Q. Could we please see again MPS4504, page 11, the overview<br/>7 picture.<br/>8 You have come in left to right or right to left?<br/>9 <b>A. We have come in left to right.</b><br/>10 Q. You are the first of the three Alpha, Bravo, Charlie<br/>11 cars and you go past KM13 YPT?<br/>12 <b>A. Yes.</b><br/>13 Q. Does the Alpha Car stop with its rear bumper next to the<br/>14 left-hand side of the silver BMW as we look at it, is it<br/>15 further forward than that?<br/>16 <b>A. Yes, it does.</b><br/>17 Q. So the rear bumper with the Alpha Car lines up with the<br/>18 left-hand side of the silver BMW?<br/>19 <b>A. Probably a bit further forward, I imagine, maybe halfway<br/>20 along if we are being exact. I imagine it's halfway<br/>21 along the silver BMW.</b><br/>22 Q. You are in the front passenger seat?<br/>23 <b>A. Yes.</b><br/>24 Q. On the top of the picture --<br/>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 43</p>   | <p>1 Q. -- as we are looking at it? Does that mean that when<br/>2 you open your door it is going to open into the parking<br/>3 space next to the silver BMW?<br/>4 <b>A. No, I am probably going to open my door, it is around<br/>5 about that area, probably the rear corner of the BMW,<br/>6 the right-hand side as you are looking at it.</b><br/>7 Q. You had put your sling on by that point?<br/>8 <b>A. Yes, sling on and cap is on, my police baseball cap is<br/>9 on.</b><br/>10 Q. What is on the other end of the sling?<br/>11 <b>A. The sling is an MCX carbine, which is -- it is a large<br/>12 weapon, it is a two-handed weapon, it is like a kind of<br/>13 shortened-down rifle and it has a front stock, which is<br/>14 a handle at the front, so I don't have to hold it as you<br/>15 would imagine a rifle, underneath to look through on<br/>16 sight, I can hold it with the foregrip.</b><br/>17 Q. Once you had opened the car door, did you have your left<br/>18 hand on the stock?<br/>19 <b>A. Yes, left hand on the stock, I knew what I was going to<br/>20 do, I was going to run and attempt to smash the window,<br/>21 the passenger window, with the muzzle of my weapon.</b><br/>22 Q. For how long had you planned to do that?<br/>23 <b>A. It was -- I think it was because it was misted up and I<br/>24 ... I think his or the window that I was going to go to<br/>25 was fogged up, so I couldn't see in, therefore he</b></p> <p style="text-align: center;">Page 44</p> |

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| <p>1 <b>couldn't see out. So I think it was -- as soon as I hit</b><br/> 2 <b>the ground, I decided right that is what is going to</b><br/> 3 <b>happen and that is when I decided what I was going to</b><br/> 4 <b>do.</b><br/> 5 Q. Let's just rewind about 45 minutes, I suppose. You are<br/> 6 back in Mayes Road, I think that is the time at which<br/> 7 you receive the information that the windows are fogged<br/> 8 up and that is the time at which you plan where each car<br/> 9 is going to be?<br/> 10 <b>A. Yes.</b><br/> 11 Q. Did you plan at that point that you would go to the<br/> 12 front passenger door or window?<br/> 13 <b>A. That is where the Alpha Car was going to stop, so I was</b><br/> 14 <b>probably going to be first out, so ...</b><br/> 15 Q. Did you know at that point that you would be smashing<br/> 16 that front window?<br/> 17 <b>A. No, not necessarily.</b><br/> 18 Q. Why not?<br/> 19 <b>A. Not necessarily. Because if he can see me and he does</b><br/> 20 <b>exactly what I want him to do, there is no reason for me</b><br/> 21 <b>to smash it.</b><br/> 22 Q. From the information you had, he was unlikely see you,<br/> 23 the windows were steamed up.<br/> 24 <b>A. Just because they were fogged up then doesn't mean they</b><br/> 25 <b>can put the air conditioning on and it can clear in</b></p> <p style="text-align: center;">Page 45</p>  | <p>1 <b>a matter of seconds.</b><br/> 2 Q. When you got out of the car did you have in your mind<br/> 3 that it was possible that you would have to break the<br/> 4 window or did you have no view until you got there?<br/> 5 <b>A. Yes, possible, right, he cannot see me, I can't see in</b><br/> 6 <b>so I am going to have to basically see into at that car</b><br/> 7 <b>as quickly as possible.</b><br/> 8 Q. We see the silver BMW next to the Audi.<br/> 9 Had you known in advance that was going to be there?<br/> 10 <b>A. Yes.</b><br/> 11 Q. You say in your witness statement at divider 2, page 5,<br/> 12 for your reference, that there were about 18 inches<br/> 13 between the cars?<br/> 14 <b>A. Yes.</b><br/> 15 Q. Had you realised how close the cars were going to be?<br/> 16 <b>A. No, obviously that is parking, it is normal parking</b><br/> 17 <b>places, it is ... we are just going to have to roll with</b><br/> 18 <b>it, there's nothing I can do about it, so --</b><br/> 19 Q. You had asked for information, including the exact<br/> 20 location of the Audi. Were you not told the proximity<br/> 21 of the silver BMW?<br/> 22 <b>A. Yes. It was parked alongside it, I think was the</b><br/> 23 <b>information we were given.</b><br/> 24 Q. So no information about how close the vehicles were to<br/> 25 each other?</p> <p style="text-align: center;">Page 46</p>   |
| <p>1 <b>A. No. No. At no stage did they say it is particularly</b><br/> 2 <b>close and at no stage did they say it is really far</b><br/> 3 <b>away. It is just parked alongside.</b><br/> 4 Q. Do you agree that 18 inches is particularly close?<br/> 5 <b>A. It is parking spaces, parking spaces close.</b><br/> 6 Q. So it wasn't surprisingly close?<br/> 7 <b>A. No.</b><br/> 8 Q. Tell us about your visibility into the car before you<br/> 9 got to the passenger window.<br/> 10 <b>A. Visibility was poor, the windows were steamed up and</b><br/> 11 <b>I can't remember if I saw any occupants through either</b><br/> 12 <b>of the windows that I could see through.</b><br/> 13 Q. Can you remember if you could see the shape of the<br/> 14 occupants or can you not even remember that?<br/> 15 <b>A. No, can't even -- I couldn't see the shape.</b><br/> 16 Q. You couldn't see the shape?<br/> 17 <b>A. No.</b><br/> 18 Q. Did you, before getting to the passenger window, issue<br/> 19 any verbal commands?<br/> 20 <b>A. As soon as I got out of the car I am shouting "armed</b><br/> 21 <b>police, armed police" as I am running towards the</b><br/> 22 <b>window, I knew what I was going to do as I approached</b><br/> 23 <b>the window, and what I didn't want to happen was for my</b><br/> 24 <b>weapon to go off with me striking the window, so I made</b><br/> 25 <b>sure that the safety catch was on and my finger was well</b></p> <p style="text-align: center;">Page 47</p> | <p>1 <b>away from the trigger, so at no stage would</b><br/> 2 <b>I involuntary grab possibly my weapon and then</b><br/> 3 <b>accidentally fire a round, so I was a massive conscious</b><br/> 4 <b>effort for that and then I struck the car window and</b><br/> 5 <b>unfortunately it didn't break.</b><br/> 6 Q. Can you help us particularly with where you were<br/> 7 standing when you were trying to break that window?<br/> 8 <b>A. Probably where you think the wing mirror of the BMW --</b><br/> 9 <b>the subject vehicle is.</b><br/> 10 Q. Can we have a look at page 12, Mr Coates? I think<br/> 11 page 12 has a more zoomed-in view.<br/> 12 Does that help?<br/> 13 <b>A. Yes, so there are two -- in between the two vehicles is</b><br/> 14 <b>a broken white line. I was probably standing in between</b><br/> 15 <b>the two dashes. I imagine, or probably towards the</b><br/> 16 <b>second dash.</b><br/> 17 THE CHAIRMAN: I think one is a dash and one is a boot,<br/> 18 actually -- one is a rear window, I mean.<br/> 19 <b>A. No, sir, in between the two vehicles, there is a kind of</b><br/> 20 <b>broken white line going down the middle.</b><br/> 21 THE CHAIRMAN: Are you saying the -- when you use the word<br/> 22 dash, do you mean the gap between the lines.<br/> 23 <b>A. Yes, the dot dash, sorry, sir.</b><br/> 24 THE CHAIRMAN: Sorry, I thought you were talking about<br/> 25 a dashboard.</p> <p style="text-align: center;">Page 48</p> |

12 (Pages 45 to 48)

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| <p>1 <b>A. Sorry, sir. I am now in between the subject vehicle and</b><br/> 2 <b>the silver BMW.</b><br/> 3 MR MOSS: We have one painted marking that's T-shaped and<br/> 4 one that's just a straight line and you are on that<br/> 5 straight line?<br/> 6 <b>A. Yes, I am probably standing just on the straight line.</b><br/> 7 Q. I know we don't quite have the perspective for it here,<br/> 8 but were you in line with the pillar between the front<br/> 9 and back doors or are you nearer the bonnet than that?<br/> 10 <b>A. I am probably standing around about the pillar, but I am</b><br/> 11 <b>quite close because obviously I am going to strike,</b><br/> 12 <b>strike the window, so I cannot be far away because my</b><br/> 13 <b>weapon is on a sling and it is not a sling that is on</b><br/> 14 <b>an elastic, it is fixed. So I need to be quite close.</b><br/> 15 Q. Were you aware of which other officers were with you<br/> 16 very close to you?<br/> 17 <b>A. No. Not until W80 says "push on".</b><br/> 18 Q. You tried to smash it three times?<br/> 19 <b>A. Yes, three times, I think.</b><br/> 20 Q. How long did those three attempts take?<br/> 21 <b>A. Well, they were as quick as I can move my hands back and</b><br/> 22 <b>forth, I think the third one, I went bang, bang and then</b><br/> 23 <b>a third one was a definite kind of this is not working</b><br/> 24 <b>I need to be stronger than I have been doing.</b><br/> 25 Q. If they were at that rhythm, it sounds like there was</p> <p style="text-align: center;">Page 49</p> | <p>1 less than a second between them?<br/> 2 <b>A. Yes, it was very quick.</b><br/> 3 Q. Two seconds in total to take the three attempts?<br/> 4 <b>A. I am not quite sure. I would hate to give a time on it,</b><br/> 5 <b>but I think with the probe in the car you might be able</b><br/> 6 <b>to work it out.</b><br/> 7 THE CHAIRMAN: I was going to say the best evidence would be<br/> 8 from the probe, won't it?<br/> 9 MR MOSS: Had you been issued specific equipment for<br/> 10 breaking windows of cars?<br/> 11 <b>A. Specific equipment is issued. I personally don't like</b><br/> 12 <b>that equipment. Only because for me to use that</b><br/> 13 <b>equipment, I've got to take one hand off my gun to then</b><br/> 14 <b>smash the window, drop that bit of equipment, usually it</b><br/> 15 <b>hangs from a lanyard, we are talking about a life-saving</b><br/> 16 <b>hammer.</b><br/> 17 Q. Can we pause and look at a different document, IPC217.<br/> 18 This is a Metropolitan Police Service training document<br/> 19 in the use of a life hammer, can you tell us what is<br/> 20 an MPS-issue life hammer, as we see in the middle of the<br/> 21 page?<br/> 22 <b>A. I think a MPS life harmer is just like any other life</b><br/> 23 <b>hammer, it is a small plastic hammer about probably 6 to</b><br/> 24 <b>9 inches in length with a grab hand and either end of</b><br/> 25 <b>the hammer is a cylindrical kind of cone coming down to</b></p> <p style="text-align: center;">Page 50</p>   |
| <p>1 <b>a point, and it is for smashing the side windows or the</b><br/> 2 <b>rear windows of cars.</b><br/> 3 Q. The whole thing fits neatly in the hand?<br/> 4 <b>A. It fits in your hand, you then strike it just as you</b><br/> 5 <b>would a hammer and the windows smash.</b><br/> 6 Q. It's the same thing we see on buses next to windows?<br/> 7 <b>A. Correct, exactly the same thing.</b><br/> 8 Q. Is it right or is it not that in every MPS vehicle you<br/> 9 would find one in the front passenger footwell?<br/> 10 <b>A. Yes. Maybe not the covert ones that we are in, but</b><br/> 11 <b>officers do have them in their possession.</b><br/> 12 Q. Did you have a personal issue one?<br/> 13 <b>A. No -- I may have, but I didn't use it.</b><br/> 14 <b>I don't think I've got one in my grab bag that I've</b><br/> 15 <b>got, as I have said, I think I have smashed windows with</b><br/> 16 <b>a muzzle before, and it has worked, it just didn't work</b><br/> 17 <b>on this --</b><br/> 18 Q. Have you smashed windows with a life hammer before?<br/> 19 <b>A. In training I have, yes.</b><br/> 20 Q. Does it work?<br/> 21 <b>A. Yes.</b><br/> 22 Q. Why did you not use it this time?<br/> 23 <b>A. Because I don't like using it, I am approaching a car</b><br/> 24 <b>with a subject in it who is armed with a firearm. For</b><br/> 25 <b>me to smash the window, I've got to do it one handed,</b></p> <p style="text-align: center;">Page 51</p>   | <p>1 <b>which means I am taking one hand off my primary weapon,</b><br/> 2 <b>which is my MCX carbine. I have then got to put my hand</b><br/> 3 <b>back on the weapon, I can't see through the window,</b><br/> 4 <b>because I have just smashed it, and what people don't</b><br/> 5 <b>understand, just because you smash a window, doesn't</b><br/> 6 <b>mean it instantly falls out, so you smash the window and</b><br/> 7 <b>it kind of stays in situation and breaks into like</b><br/> 8 <b>a thousand pieces, so you then cannot see through that</b><br/> 9 <b>window.</b><br/> 10 <b>Which is a big problem for us as well, if for some</b><br/> 11 <b>reason they are then pointing a firearm at you or they</b><br/> 12 <b>are doing something inside that window, you then have to</b><br/> 13 <b>rake the glass out and then see what you are left with</b><br/> 14 <b>inside.</b><br/> 15 Q. Considering the point that you would have to take one<br/> 16 hand off your primary weapon, we know that your safety<br/> 17 was on, we know that your hand was not on trigger so you<br/> 18 were not in a ready-to-fire position, were you?<br/> 19 <b>A. It is a flick -- I'm just ... the safety it is less than</b><br/> 20 <b>a fraction of a second.</b><br/> 21 Q. There is a significant difference between the amount of<br/> 22 time it would take to put your hand on the weapon and<br/> 23 put down the life harmer versus removing the safety --<br/> 24 <b>A. You can fire one handed, but it is never accurate, and</b><br/> 25 <b>obviously accuracy is very important when you are have</b></p> <p style="text-align: center;">Page 52</p> |

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| <p>1 a firearm in your hand.</p> <p>2 Q. Why did you not try to open the door before smashing the</p> <p>3 window?</p> <p>4 <b>A. For me to open the door, I, I would have to reach past</b></p> <p>5 <b>the window to get to the door handle, I would have to</b></p> <p>6 <b>take my right hand off my weapon and my trigger hand off</b></p> <p>7 <b>my weapon, so that means that weapon is incapable of</b></p> <p>8 <b>firing. If I was to use my left hand and grab it, so</b></p> <p>9 <b>I've got my right hand on my weapon, I am now reaching</b></p> <p>10 <b>past the window and I've got a potential armed subject</b></p> <p>11 <b>who has now got my back.</b></p> <p>12 Q. We know that there were three of you in each vehicle, we</p> <p>13 know that there were three vehicles ready to deploy, and</p> <p>14 there was obviously the control vehicle, as well.</p> <p>15 We know also that there were three people inside the</p> <p>16 Audi. How did you get into the position where you were</p> <p>17 dealing alone with Jermaine Baker in the front seat?</p> <p>18 <b>A. We try and deploy around the car as quickly as possible.</b></p> <p>19 <b>That is the safest for the people in the car and safest</b></p> <p>20 <b>for the police officers who were approaching the car.</b></p> <p>21 <b>The less time we can give the subjects in the car to</b></p> <p>22 <b>think about what their options are, the safest it is for</b></p> <p>23 <b>them. If we let -- if we don't do it quickly, then they</b></p> <p>24 <b>will come up with some ridiculous plan in a fraction of</b></p> <p>25 <b>a second which is to stop them going to jail for</b></p> <p style="text-align: center;">Page 53</p> | <p>1 a significant amount of time.</p> <p>2 Q. Do you accept that you lost quite a lot more than</p> <p>3 a fraction of a second by using the muzzle of your gun</p> <p>4 three times?</p> <p>5 <b>A. No, because we go for the shock and awe as well, because</b></p> <p>6 <b>he -- I am banging on the window and any instruction to</b></p> <p>7 <b>him or them inside the car is a good distraction for us.</b></p> <p>8 <b>If they are locking at us and thinking what is happening</b></p> <p>9 <b>outside, then they are not thinking about right, I've</b></p> <p>10 <b>got a gun, I am going to now raise it towards the</b></p> <p>11 <b>police.</b></p> <p>12 MR MOSS: Sir, I probably have another 40 minutes, but I am</p> <p>13 to move on to a new topic that will take me more than</p> <p>14 the time we have until 11.15.</p> <p>15 THE CHAIRMAN: Yes, we will take our break now. 11.20?</p> <p>16 MR MOSS: Thank you.</p> <p>17 THE CHAIRMAN: Thank you very much.</p> <p>18 MR MOSS: Thank you, S111.</p> <p>19 (11.10 am)</p> <p>20 (A short adjournment)</p> <p>21 (11.25 am)</p> <p>22 THE CHAIRMAN: Thank you.</p> <p>23 MR MOSS: S111, just before we move on I am going to go back</p> <p>24 to three topics and ask you just a couple of questions</p> <p>25 before we move on. We are going to look at shift</p> <p style="text-align: center;">Page 54</p>  |
| <p>1 patterns, the firearms enabled message and Hatton guns.</p> <p>2 Shift patterns, first.</p> <p>3 You were on an 8.00 till 4.00 shift, that was your</p> <p>4 evidence?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Are you able to speak about the shift patterns that your</p> <p>7 colleagues were on on that Thursday, the 10th?</p> <p>8 <b>A. No, I am not.</b></p> <p>9 Q. The two officers that we are going to hear from later</p> <p>10 today will say they were on a late shift. Would you</p> <p>11 describe an 8 to 4 as a late shift --</p> <p>12 <b>A. No, a late shift would be 2 till whenever they finish.</b></p> <p>13 Q. Probably it is an eight-hour shift at a minimum --</p> <p>14 <b>A. It is an eight-hour shift, our job is not hour depicted,</b></p> <p>15 <b>it is job dependent, so if a threat to life comes in,</b></p> <p>16 <b>for example, they were the late turn team, so if the</b></p> <p>17 <b>threat to life come in at 2.00 and the job didn't finish</b></p> <p>18 <b>until 4.00 the next morning, they would be on until</b></p> <p>19 <b>then, they would be rolling from one job straight to</b></p> <p>20 <b>another, if we couldn't get any other staff to go to the</b></p> <p>21 <b>position, so it is not an eight-hour shift, it is</b></p> <p>22 <b>an eight-hour shift as long as no threats to life come</b></p> <p>23 <b>in.</b></p> <p>24 Q. That is all on shift patterns.</p> <p>25 Let's look at the firearms enabled message next.</p> <p style="text-align: center;">Page 55</p>  | <p>1 You have already answered one hypothetical that I put to</p> <p>2 you, I am going to put a very slightly different one.</p> <p>3 If the message had come over the radio, "It will be</p> <p>4 an imitation firearm" what would that have done to your</p> <p>5 thinking?</p> <p>6 <b>A. It wouldn't have changed it really. I am the only</b></p> <p>7 <b>person that is going to dictate if I think it is</b></p> <p>8 <b>an imitation firearm. As in on that it's only once it</b></p> <p>9 <b>is in my hand, really.</b></p> <p>10 <b>It will be an imitation firearm, how did they get</b></p> <p>11 <b>that information, does that person who says it is</b></p> <p>12 <b>an imitation, have they got any firearms experience, are</b></p> <p>13 <b>they just taking it secondhand. I can't risk my life or</b></p> <p>14 <b>the life of my colleagues on "it is an imitation" from</b></p> <p>15 <b>somebody I don't know.</b></p> <p>16 Q. Let's try one more hypothetical and you might well quite</p> <p>17 fairly say in response that this would never happen and</p> <p>18 that would never be said, but the chairman later will</p> <p>19 consider what message should have been.</p> <p>20 What if the message had been, "We know that it is</p> <p>21 an imitation firearm", would that have given you enough</p> <p>22 to go on?</p> <p>23 <b>A. No.</b></p> <p>24 Q. Finally -- in fact I promised Hatton guns --</p> <p>25 THE CHAIRMAN: Why would it not have been enough?</p> <p style="text-align: center;">Page 56</p> |

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| <p>1 <b>A. It is -- you need to know yourself, sir, to have a gun</b><br/> 2 <b>pointed at you, irrespective of it is a real one or</b><br/> 3 <b>an imitation one, can have life changing -- people's</b><br/> 4 <b>lives change purely because they get a gun pointed at</b><br/> 5 <b>them, it doesn't matter if it is an imitation or it's</b><br/> 6 <b>a real one.</b><br/> 7 <b>So for us to be told, yes, it is definitely</b><br/> 8 <b>an imitation, well, yes but you might not have all the</b><br/> 9 <b>information on this OCG and the guns that they are</b><br/> 10 <b>bringing to this. They might have --</b><br/> 11 THE CHAIRMAN: In other words, although you are told it is<br/> 12 definitely, because of the consequences of getting it<br/> 13 wrong, you cannot rely on what you are told, whether it<br/> 14 is from one end of the spectrum to the other, until you<br/> 15 have seen the firearm for yourself?<br/> 16 <b>A. Yes, seen it, felt it, had a look at it.</b><br/> 17 THE CHAIRMAN: Until you have had an opportunity of<br/> 18 exercising your own judgment.<br/> 19 <b>A. Yes.</b><br/> 20 <b>Then again, just because someone has an imitation or</b><br/> 21 <b>real firearm in their possession, doesn't mean they are</b><br/> 22 <b>going to be shot by police. It is what they do with</b><br/> 23 <b>that firearm which will then dictate what our reaction</b><br/> 24 <b>to that is.</b><br/> 25 MR MOSS: Let's stay with that hypothetical for one more</p> <p style="text-align: center;">Page 57</p>                              | <p>1 question.<br/> 2 Let's say you are told we know it will be<br/> 3 an imitation firearm. Would that be inconsistent with<br/> 4 you, a trained firearms officer, then being deployed at<br/> 5 state amber, would you expected the authorisation to be<br/> 6 withdrawn for example?<br/> 7 <b>A. No. Even if they say it is stone bonker, 100 per cent</b><br/> 8 <b>it is an imitation firearm, people are fallible, people</b><br/> 9 <b>have got things wrong, we cannot take that risk, if</b><br/> 10 <b>a member of the public or a colleague is at risk.</b><br/> 11 <b>As I said, just because he has it in his possession,</b><br/> 12 <b>it is what they do with it that would we would then take</b><br/> 13 <b>action.</b><br/> 14 Q. In relation to your evidence about the Hatton gun<br/> 15 discussion with W80, before arriving in Bracknell Close,<br/> 16 did you know how the Audi was positioned?<br/> 17 <b>A. Yes, it was basically facing out of Bracknell Close, as</b><br/> 18 <b>in it was parked. As you see on the picture.</b><br/> 19 Q. You didn't for example know the distance between it and<br/> 20 the silver BMW?<br/> 21 <b>A. No, but it was parked alongside is what the surveillance</b><br/> 22 <b>team told us, in a residence bay I think they said.</b><br/> 23 Q. How were you, W80 and R116 able to know that you would<br/> 24 be able to box it in?<br/> 25 <b>A. There was no one in the silver BMW, so that car is not</b></p> <p style="text-align: center;">Page 58</p>  |
| <p>1 <b>going to move. And we position our vehicles in such</b><br/> 2 <b>a way that that vehicle has a very slight area of</b><br/> 3 <b>manoeuvrability until we get up and close to the driver</b><br/> 4 <b>and the front-seat passenger.</b><br/> 5 Q. Is it fair to say you thought there was a good chance<br/> 6 you would be able to box it in or you wouldn't be able<br/> 7 to --<br/> 8 <b>A. It is never 100 per cent and if for some reason he</b><br/> 9 <b>wanted to reverse four feet, knock some of the wall</b><br/> 10 <b>down, then reverse and then drive as fast as he could</b><br/> 11 <b>have, hard right hand lock out past Charlie, then he may</b><br/> 12 <b>have if we had given him time to do that. But that is</b><br/> 13 <b>the reason we do it as we do, shock and awe, we get</b><br/> 14 <b>round the car as quickly as possible so he hasn't got</b><br/> 15 <b>time to think to do a stupid manoeuvre which is going to</b><br/> 16 <b>put him at risk, his passengers at risk and police</b><br/> 17 <b>officers at risk.</b><br/> 18 Q. Jumping forward very slightly to a topic I am going to<br/> 19 ask you about in a lot more detail, I expect you are<br/> 20 going to say later in your evidence that there came<br/> 21 a time when you thought the driver was trying to carry<br/> 22 out an escape manoeuvre.<br/> 23 Isn't that inconsistent with you being confident<br/> 24 that you were able to box it in?<br/> 25 <b>A. No, I heard -- and I am jumping forward a little bit</b></p> <p style="text-align: center;">Page 59</p> | <p>1 <b>here, I heard what I kind of thought was -- not kind of</b><br/> 2 <b>thought, what I thought was a Hatton gun round going</b><br/> 3 <b>off. Just because I hear that round going off, that</b><br/> 4 <b>hasn't mean we haven't boxed the car in properly. That</b><br/> 5 <b>driver might be attempting to drive out of an impossible</b><br/> 6 <b>situation, if we hear high revving of an engine as we</b><br/> 7 <b>approach the car, we are going to think, right he is --</b><br/> 8 <b>he might be trying to escape, so we are going to then</b><br/> 9 <b>Hatton gun the tyre.</b><br/> 10 Q. Finally, I promised you three topics, I have a fourth<br/> 11 and then we will go back to the narrative. If we could<br/> 12 see please again IPC217, we are on page 3 and we are<br/> 13 going see some bullet points and is the life hammer<br/> 14 training document.<br/> 15 The second bullet point under "Rationale" describes<br/> 16 this as "the preferred equipment", were you aware of<br/> 17 that?<br/> 18 <b>A. Yes, I know it is the preferred equipment. It is</b><br/> 19 <b>preferred equipment to smash a window. It is probably</b><br/> 20 <b>not preferred equipment to bring forward to a man who is</b><br/> 21 <b>possibly pointing a gun at you towards a car.</b><br/> 22 Q. If we could now please look at COP55, this is a document<br/> 23 I suspect you have not seen before, it is the witness<br/> 24 statement of Kevin Nicholson on behalf of the College of<br/> 25 Policing?</p> <p style="text-align: center;">Page 60</p> |

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| <p>1 <b>A. Okay.</b></p> <p>2 Q. Within that, if we could please look at page 32, where</p> <p>3 Mr Nicholson quotes verbatim from D8, a College of</p> <p>4 Policing training document which I suspect you are</p> <p>5 familiar with. There is one particular line I am going</p> <p>6 to ask you to look at in the bottom paragraph, second</p> <p>7 line:</p> <p>8 "A conventional unadapted police firearm ..."</p> <p>9 That is what you were carrying?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. "... is not designed or intended for this purpose and</p> <p>12 should not be used as such."</p> <p>13 The purpose we see is striking the corner of</p> <p>14 a window.</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Were you aware of that being in the training?</p> <p>17 <b>A. I know it is not the perfect item to use. I know there</b></p> <p>18 <b>are better things on the market, but, as I said before,</b></p> <p>19 <b>I don't want to take my hand off my primary weapon as</b></p> <p>20 <b>I am approaching a car with an armed subject inside it,</b></p> <p>21 <b>purely because --</b></p> <p>22 THE CHAIRMAN: Can you envisage any weapon which you could</p> <p>23 use apart from your firearm if the object of the</p> <p>24 exercise, as far as you are concerned, is not to take</p> <p>25 your hand off your weapon?</p> <p style="text-align: center;">Page 61</p>  | <p>1 <b>A. Well, you could -- yes, you could have gone forward with</b></p> <p>2 <b>a Glock firearm, so you can fire that one handed, that</b></p> <p>3 <b>is a handgun.</b></p> <p>4 THE CHAIRMAN: Yes.</p> <p>5 <b>A. But, again, shooting one handed is not as accurate. We</b></p> <p>6 <b>do shoot one handed, but it is not as accurate as we</b></p> <p>7 <b>shoot two handed when we are using the Glock handgun,</b></p> <p>8 <b>so --</b></p> <p>9 THE CHAIRMAN: Apart from the Glock, which you say is</p> <p>10 designed or capable of being used one handed but may not</p> <p>11 be as accurate, can you think of any alternative to the</p> <p>12 butt of your firearm --</p> <p>13 <b>A. It is not the butt, it was the muzzle, sir.</b></p> <p>14 THE CHAIRMAN: The muzzle, I am sorry, to the muzzle of your</p> <p>15 firearm --</p> <p>16 <b>A. No, unless --</b></p> <p>17 THE CHAIRMAN: -- to smash a window.</p> <p>18 <b>A. I am going back a few years. They did have</b></p> <p>19 <b>an attachment you put on the muzzle of your firearm</b></p> <p>20 <b>which didn't interfere with the muzzle of your firearm</b></p> <p>21 <b>or the bullet that came out of the muzzle, and it was</b></p> <p>22 <b>an attachment you put on to assist smashing windows.</b></p> <p>23 THE CHAIRMAN: Why was that discontinued?</p> <p>24 <b>A. No idea, sir.</b></p> <p>25 THE CHAIRMAN: That would have achieved the objective of the</p> <p style="text-align: center;">Page 62</p> |
| <p>1 exercise, wouldn't it?</p> <p>2 <b>A. Yes, it would have, sir, yes.</b></p> <p>3 MR MOSS: Is that the sort of thing that Mr Nicholson seems</p> <p>4 to have in mind when he says a conventional unadapted</p> <p>5 firearm is not designed -- you are talking about</p> <p>6 an adapted unconventional firearm.</p> <p>7 <b>A. Yes, it is something you add to yours -- as far as</b></p> <p>8 <b>I know, things may have changed in the last six years,</b></p> <p>9 <b>but it wasn't something we put on the end of our</b></p> <p>10 <b>weapons.</b></p> <p>11 Q. If we could take that off the screen, please.</p> <p>12 In your witness statements, and you have made quite</p> <p>13 a few of them, you speak in detail about a lot of the</p> <p>14 decisions that you made on that day. You don't talk</p> <p>15 about why you chose not to use the life hammer, why is</p> <p>16 that?</p> <p>17 <b>A. It is not something I like to use, purely for --</b></p> <p>18 Q. Why is it you didn't talk about it in your evidence?</p> <p>19 <b>A. I didn't, because I didn't -- it just wasn't at the</b></p> <p>20 <b>front of my mind. I didn't use it because I think it is</b></p> <p>21 <b>dangerous in that situation.</b></p> <p>22 Q. But you were aware, were you not, that you were using</p> <p>23 a non-preferred option?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. Is that not something you accept you should have</p> <p style="text-align: center;">Page 63</p> | <p>1 commented on in your written --</p> <p>2 <b>A. Yes, I should have commented on.</b></p> <p>3 Q. Thank you, S111.</p> <p>4 We will get back to the narrative. It was a while</p> <p>5 ago, so let me remind you where you had got to. You had</p> <p>6 taken your three attempts to break the window with the</p> <p>7 muzzle, you are standing near to the pillar of the car</p> <p>8 between the two doors. You didn't try to open the door</p> <p>9 before smashing the window and then you said that W80</p> <p>10 said to you, "Push on, I've got it" and that is where we</p> <p>11 had reached?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. What did you understand by, "Push on, I've got it"?</p> <p>14 <b>A. I will take that door, you push on to the rear doors,</b></p> <p>15 <b>I will deal with this.</b></p> <p>16 Q. Did you, after that point, continue to watch W80 or did</p> <p>17 your attention move on?</p> <p>18 <b>A. No, I -- my attention was then drawn to the rear</b></p> <p>19 <b>passenger door, which I then was going to be opening.</b></p> <p>20 Q. Are you able to help us at all with the actions of W80</p> <p>21 from things you saw over the next few seconds?</p> <p>22 <b>A. No, I am not.</b></p> <p>23 Q. You moved past the front door of the mission vehicle?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. You moved also I think past the rear door?</p> <p style="text-align: center;">Page 64</p>  |



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| <p>1 <b>A. Yes.</b></p> <p>2 Q. As you passed the rear door, did you consider trying to</p> <p>3 smash it with the muzzle of your weapon?</p> <p>4 <b>A. No, because for me to do that -- as I have said before,</b></p> <p>5 <b>we want to do things as quickly as we can and we don't</b></p> <p>6 <b>want to give the people in the car any time to think</b></p> <p>7 <b>about stupid things that are going to get them to drive</b></p> <p>8 <b>out and possibly injure themselves, so I want to push --</b></p> <p>9 <b>he has already seen me, or the occupant has already seen</b></p> <p>10 <b>me leave my car, try and smash the window three times,</b></p> <p>11 <b>and then push past his window, so you would be able to</b></p> <p>12 <b>tell from the tape exactly how long that is, but</b></p> <p>13 <b>although it doesn't sound very long, it is long enough</b></p> <p>14 <b>for him to make possibly irrational decisions and I want</b></p> <p>15 <b>to cut that time down as much as possible. So I want to</b></p> <p>16 <b>try and get in that car quicker. It has not worked</b></p> <p>17 <b>initially in the front window, so I am not going to try</b></p> <p>18 <b>and smash the rear window.</b></p> <p>19 Q. When I asked you in relation to the front window whether</p> <p>20 you gave the occupants of the car some thinking time,</p> <p>21 you said, "No, they would have been in shock and awe"?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Would the person in the back seat not have been in shock</p> <p>24 and awe?</p> <p>25 <b>A. Yes, he would have but he has had an extra second and</b></p> <p style="text-align: center;">Page 65</p> | <p>1 <b>a half, two seconds, however long it has taken. I am</b></p> <p>2 <b>not sure quite how much he recovers from, "Right, the</b></p> <p>3 <b>police are coming, they are trying to get in the car,</b></p> <p>4 <b>what can I could?" I don't want him to make any</b></p> <p>5 <b>irrational decisions.</b></p> <p>6 Q. Were the car doors locked?</p> <p>7 <b>A. No.</b></p> <p>8 Q. How do you know that?</p> <p>9 <b>A. Because I was able to open the rear passenger door on my</b></p> <p>10 <b>side.</b></p> <p>11 Q. Did you give any verbal commands as you did so?</p> <p>12 <b>A. I think I would have said, told them, "Get hands up ..."</b></p> <p>13 <b>I can't see it.</b></p> <p>14 Q. Page 5 of your longest statement you say you said "armed</p> <p>15 police"?</p> <p>16 <b>A. "Armed police", yes.</b></p> <p>17 Q. Do you think that's right or do you think you said</p> <p>18 "hands up"?</p> <p>19 <b>A. No, I would have said "armed police".</b></p> <p>20 Q. Why do you say then just now that you would have said</p> <p>21 hands up, would that have been the correct thing to say?</p> <p>22 <b>A. No, we want to make sure they know exactly who they are</b></p> <p>23 <b>facing. Armed police is an international term that</b></p> <p>24 <b>everybody recognises, irrespective of your language you</b></p> <p>25 <b>probably can understand it, so just want to make sure he</b></p> <p style="text-align: center;">Page 66</p>   |
| <p>1 <b>knew exactly who we were.</b></p> <p>2 Q. Could you open the door fully?</p> <p>3 <b>A. No, because obviously there is only -- however close</b></p> <p>4 <b>that silver BMW is, so I can only open it I think I have</b></p> <p>5 <b>said 18 inches.</b></p> <p>6 Q. If we look, please, again at MPS4504, page 12 this time,</p> <p>7 this is the cam product again.</p> <p>8 Is it right from that that in all likelihood you</p> <p>9 would have been able to open the rear door less than you</p> <p>10 would have been able to open the front door?</p> <p>11 <b>A. Yes, that's correct.</b></p> <p>12 Q. The gap at the rear of the Audi is smaller between it</p> <p>13 and the BMW --</p> <p>14 <b>A. Yes, it is.</b></p> <p>15 Q. -- than the gap at the front of the Audi?</p> <p>16 <b>A. Yes, it is.</b></p> <p>17 Q. If we take that down, please, who could you see when you</p> <p>18 opened the door partly?</p> <p>19 <b>A. I could see a Turkish looking male, dark clothing,</b></p> <p>20 <b>sitting behind the front passenger seat.</b></p> <p>21 Q. At that moment in time, could you see one, both or</p> <p>22 neither of his hands?</p> <p>23 <b>A. I could see both his hands at that time.</b></p> <p>24 Q. Did there come a time when he moved?</p> <p>25 <b>A. Yes, he sat back in his seat and raised his hands up</b></p> <p style="text-align: center;">Page 67</p>  | <p>1 <b>towards his chest in that manner. (Indicates)</b></p> <p>2 Q. When you say "that manner", I think there is not</p> <p>3 a camera on you at the moment, can you describe what</p> <p>4 that manner is?</p> <p>5 <b>A. Yes, he pulled his hands back and out of my sight, but</b></p> <p>6 <b>if you were to do -- put your hands in front of either</b></p> <p>7 <b>of your shoulders, that is what he was doing with the</b></p> <p>8 <b>palms facing out.</b></p> <p>9 Q. Were you able to see his hands?</p> <p>10 <b>A. No.</b></p> <p>11 Q. How do you know his palms were facing out?</p> <p>12 <b>A. I saw him come up quickly, so, you are right, I don't</b></p> <p>13 <b>know if they are facing out or in, but that is what he</b></p> <p>14 <b>sat back and his hands came out and out of my view, and</b></p> <p>15 <b>it is that move that I imagined he was doing.</b></p> <p>16 Q. In your statement, and I think now your oral evidence,</p> <p>17 you say you couldn't see his head and his hands --</p> <p>18 <b>A. Yes, correct.</b></p> <p>19 Q. -- because of your angle.</p> <p>20 What did you understand from his reaction, what did</p> <p>21 you think he was doing?</p> <p>22 <b>A. I wasn't quite sure what he was doing, he may have been</b></p> <p>23 <b>going for something in or around his chest area, out of</b></p> <p>24 <b>my vision. He wasn't doing what I wanted him to do.</b></p> <p>25 Q. The motion you did, which I know we have seen in this</p> <p style="text-align: center;">Page 68</p> |

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| <p>1 courtroom, but it is not going to be seen on the</p> <p>2 transcript made me think that you were surrendering, you</p> <p>3 were putting your hands up.</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Is that not what you thought this man was doing?</p> <p>6 <b>A. No, I want to see -- usually the instructions we give</b></p> <p>7 <b>people, or I want to give people, is:</b></p> <p>8 <b>"Make sure your hands don't leave my sight, no</b></p> <p>9 <b>sudden movements, because if I think you are making</b></p> <p>10 <b>a sudden movement, I am going to think you are going for</b></p> <p>11 <b>something that you shouldn't be going for."</b></p> <p>12 THE CHAIRMAN: That is not what you said.</p> <p>13 Because that is very detailed and technical. It may</p> <p>14 be what you want to happen --</p> <p>15 <b>A. Sorry, sir, yes.</b></p> <p>16 THE CHAIRMAN: -- but what are you saying to the man in the</p> <p>17 back of the car to make him respond in the way that you</p> <p>18 want him to?</p> <p>19 <b>A. All I have said is "armed police", that is all I have</b></p> <p>20 <b>said to the man in the back of the car.</b></p> <p>21 THE CHAIRMAN: That is all you have said, thank you.</p> <p>22 MR MOSS: There seems to be an inconsistency between what</p> <p>23 you would expect, that is don't move your hands, and</p> <p>24 what you initially assumed you would have said to the</p> <p>25 man in the car, which was "hands up". Before you looked</p> <p style="text-align: center;">Page 69</p>   | <p>1 at your statement, that is what you assumed you would</p> <p>2 have said.</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Do you think maybe you gave confused instructions?</p> <p>5 <b>A. No, not really. I have -- the instructions are short</b></p> <p>6 <b>and sharp. It is not a sentence. So usually, we shout</b></p> <p>7 <b>armed police so they know who we are and then it is</b></p> <p>8 <b>a case of then us taking them out from the car in</b></p> <p>9 <b>an approved manner, putting them on the floor, I just</b></p> <p>10 <b>don't want him to do anything stupid with his hands.</b></p> <p>11 <b>But I appreciate I didn't say that to him on the</b></p> <p>12 <b>day. But once he then sat up with his hands coming out</b></p> <p>13 <b>of my sight, I then need to get him out of the car,</b></p> <p>14 <b>because I can't get any -- if he is going for some sort</b></p> <p>15 <b>of firearm, I can't ... because of my position and the</b></p> <p>16 <b>position that the door opens, I can't get my firearm</b></p> <p>17 <b>round to him.</b></p> <p>18 Q. This I think is the important issue for the chairman to</p> <p>19 understand your evidence on here.</p> <p>20 Did you understand this man's raising of his arms to</p> <p>21 be a sign of compliance, did you understand it to be</p> <p>22 threatening or did you understand it to be something</p> <p>23 else?</p> <p>24 <b>A. I understood it to be something else, I think he</b></p> <p>25 <b>wouldn't put his hands up, because I hadn't told him to</b></p> <p style="text-align: center;">Page 70</p> |
| <p>1 <b>do that, although in a lot of people do put their hands</b></p> <p>2 <b>up immediately, I thought his sitting back in the seat</b></p> <p>3 <b>and bringing his hands out of my view was he wanted to</b></p> <p>4 <b>be out of my view for a particular reason.</b></p> <p>5 Q. Regardless of what your threat assessment was before you</p> <p>6 opened the door, when this man, Gokay Sogucakli, raised</p> <p>7 his hands, did that increase your threat assessment?</p> <p>8 <b>A. Not any more than it was when I was approaching the car.</b></p> <p>9 Q. It didn't lower your threat assessment?</p> <p>10 <b>A. It didn't lower my threat assessment, no.</b></p> <p>11 Q. Did you then hear something from one of your colleagues?</p> <p>12 <b>A. Yes, I heard what I thought was a Hatton gun discharged.</b></p> <p>13 Q. What made you think that was what it was?</p> <p>14 <b>A. I heard it and I thought maybe the driver is attempting</b></p> <p>15 <b>to get out and he is trying to start the car or revving</b></p> <p>16 <b>the engine and that is why a Hatton gun would be</b></p> <p>17 <b>discharged.</b></p> <p>18 Q. In combination with what you had just seen the man in</p> <p>19 the back of the car do, raising his hands, and now your</p> <p>20 belief that the car might be trying to ram its way out</p> <p>21 and escape, what did you think you had to do?</p> <p>22 <b>A. I wanted to get him out of the car so at least, if for</b></p> <p>23 <b>some reason the car escaped, at least we have got</b></p> <p>24 <b>an occupant of the car to hand over to the detectives to</b></p> <p>25 <b>then interview.</b></p> <p style="text-align: center;">Page 71</p> | <p>1 Q. Did you have any other officers supporting you at that</p> <p>2 time?</p> <p>3 <b>A. Not at that particular time.</b></p> <p>4 Q. How did you do it?</p> <p>5 <b>A. I reached in around about his head and throat area with</b></p> <p>6 <b>my left hand, because obviously my right hand was still</b></p> <p>7 <b>with my weapon. I have then grabbed him, pulled him</b></p> <p>8 <b>out, because if you kind of grab the head and pull it</b></p> <p>9 <b>out, the rest of the body tends to follow in the same</b></p> <p>10 <b>direction, rather than try and pull an arm out which</b></p> <p>11 <b>they can fight against. So if you pull the head the</b></p> <p>12 <b>rest of the body will follow, and then pulled him out of</b></p> <p>13 <b>the car and on to the floor towards the rear of the car.</b></p> <p>14 Q. Is your safety on or off?</p> <p>15 <b>A. I can't remember, sir.</b></p> <p>16 Q. Is your right hand on the trigger or not on the trigger?</p> <p>17 <b>A. The hand was not on the trigger.</b></p> <p>18 Q. But your right hand is on the weapon?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Would that mean your index finger is running along the</p> <p>21 gun, pointing towards the muzzle?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. When you got the man out of the car, Gokay Sogucakli,</p> <p>24 how did you control him?</p> <p>25 <b>A. Eventually he has fallen onto the floor, he has got his</b></p> <p style="text-align: center;">Page 72</p>   |

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| <p>1 <b>hand under his body, fearing that he may have gone for</b><br/> 2 <b>firearm or any other weapon, I have struck him two or</b><br/> 3 <b>three times demanding his hands get out from under his</b><br/> 4 <b>body. I get one hand and I then put him in a wristlock</b><br/> 5 <b>and a shoulder lock.</b><br/> 6 Q. You say eventually you got him out, but I suspect you<br/> 7 don't mean it took a long time?<br/> 8 <b>A. Oh, no, it didn't take a long time. Within a --</b><br/> 9 <b>however long, I got an arm and then I put an elbow lock</b><br/> 10 <b>I think and a wristlock on him.</b><br/> 11 Q. Did his hands go out of sight when he was on the floor?<br/> 12 <b>A. Yes, they went under his body, which if someone is going</b><br/> 13 <b>to be forced to the floor is a normal thing to do, but</b><br/> 14 <b>it could also be he is going for a weapon.</b><br/> 15 Q. What did you think he was doing?<br/> 16 <b>A. I thought he may have been going for some item to be</b><br/> 17 <b>used either in escape or to hurt me or one of my</b><br/> 18 <b>colleagues.</b><br/> 19 Q. What you mean by some item?<br/> 20 <b>A. He could have been going for a gun.</b><br/> 21 Q. Did you think he was going for a gun?<br/> 22 <b>A. Yes.</b><br/> 23 Q. What was your reaction when you thought that?<br/> 24 <b>A. I shouted at him to get his hands out and I stamp or</b><br/> 25 <b>kick him two or three times.</b></p> <p style="text-align: center;">Page 73</p>                      | <p>1 Q. Were you at that time covering him with your gun?<br/> 2 <b>A. Yes.</b><br/> 3 Q. What does that mean?<br/> 4 <b>A. Therefore my gun was pointed basically towards his back,</b><br/> 5 <b>so if he did roll over I would be in a position to fire</b><br/> 6 <b>immediately.</b><br/> 7 Q. I am now going to ask you about that bit of the scenario<br/> 8 again. But I am going to stop at two points in time and<br/> 9 we are going to explore your views of force decisions in<br/> 10 relation to Gokay Sogucakli.<br/> 11 The first point in time is this, when you formed the<br/> 12 view that you needed to get him out of the car.<br/> 13 <b>A. Okay.</b><br/> 14 Q. At that time, you were by a door that didn't open fully,<br/> 15 you were the only officer in that position, you believed<br/> 16 that the occupants of the car were armed, you believed<br/> 17 they would be prepared to use firearms to get Izzet Eren<br/> 18 out of custody and then Gokay Sogucakli's hands and head<br/> 19 went out of sight. That's a fair summary of the<br/> 20 position you were in?<br/> 21 <b>A. Yes.</b><br/> 22 Q. You then formed the view that you had to get<br/> 23 Gokay Sogucakli out of the car quickly, whether that was<br/> 24 the right view or not does not matter --<br/> 25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 74</p> |
| <p>1 Q. -- that is what you thought.<br/> 2 What use of force options did you consider at that<br/> 3 point in time?<br/> 4 <b>A. Well, I am not going to ask him to do it, I am going to</b><br/> 5 <b>tell him to do it and I am going -- I reached in and</b><br/> 6 <b>I grabbed him. Are you asking for acts and steps of use</b><br/> 7 <b>of force that I have used to get him out?</b><br/> 8 Q. No, I am asking for options, actual practical options<br/> 9 that you had?<br/> 10 <b>A. Practical options, I could have grabbed his arm, grabbed</b><br/> 11 <b>his one arm but then again I can't see his arm, so</b><br/> 12 <b>I have to reach in with my left hand and then pull him</b><br/> 13 <b>out in some sort of armlock which is very difficult to</b><br/> 14 <b>do one handed with a gun in your other hand.</b><br/> 15 <b>I could have done distraction strikes on his body</b><br/> 16 <b>and then pulled him out.</b><br/> 17 Q. Would that have been manual distraction strikes?<br/> 18 <b>A. That would have been manual distraction strikes.</b><br/> 19 <b>I couldn't get an Asp out, so I would have to resort to</b><br/> 20 <b>me using my knee on his leg or me kicking in the leg</b><br/> 21 <b>somehow.</b><br/> 22 Q. You would go for a pressure point, would you, on his<br/> 23 body?<br/> 24 <b>A. Not if that is going to take far too long to act, so you</b><br/> 25 <b>need something that is going to be fairly quick. I may</b></p> <p style="text-align: center;">Page 75</p> | <p>1 <b>have gone for a punch in the face. Anything to take his</b><br/> 2 <b>mind -- if he is actually going for a weapon, to change</b><br/> 3 <b>his mind or to make him think of something different.</b><br/> 4 Q. You discounted verbal commands, that was not going to<br/> 5 work?<br/> 6 <b>A. Well, no, I have already given "armed police" and --</b><br/> 7 Q. You discounted them in isolation?<br/> 8 <b>A. Yes.</b><br/> 9 Q. You said telling him what to do wasn't going to work?<br/> 10 <b>A. No.</b><br/> 11 Q. You went for hand-to-hand manual options?<br/> 12 <b>A. Yes.</b><br/> 13 Q. You obviously had at your disposal lethal and non-lethal<br/> 14 options as well?<br/> 15 <b>A. Correct.</b><br/> 16 Q. Did you consider any of those?<br/> 17 <b>A. No, I did not.</b><br/> 18 Q. Might you have used a Taser in those circumstances?<br/> 19 <b>A. No. It would have just taken far too long, I didn't</b><br/> 20 <b>have the Taser. That was one of the other occupants of</b><br/> 21 <b>the car had the Taser, I physically didn't have the</b><br/> 22 <b>Taser in my possession.</b><br/> 23 THE CHAIRMAN: How many Taser devices were there?<br/> 24 <b>A. Just one per car, sir.</b><br/> 25 THE CHAIRMAN: Is that standard?</p> <p style="text-align: center;">Page 76</p>  |

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| <p>1 <b>A. Yes, sir, it is.</b></p> <p>2 THE CHAIRMAN: Even when there are three armed officers?</p> <p>3 <b>A. Yes, but any given -- which bit of kit do you use --</b></p> <p>4 THE CHAIRMAN: Which of the three of you had the Taser.</p> <p>5 <b>A. It would have gone -- R116 would have probably had the</b></p> <p>6 <b>Taser, but you are going to have to ask him. I didn't</b></p> <p>7 <b>have --</b></p> <p>8 THE CHAIRMAN: Because he was in the back?</p> <p>9 <b>A. No, he was driving, sir.</b></p> <p>10 THE CHAIRMAN: Because he was driving, sorry.</p> <p>11 <b>A. Yes, because he was driving. Usually the driver has the</b></p> <p>12 <b>Taser, purely because he is last out of the car, he</b></p> <p>13 <b>hasn't got a position to put his MCX carbine, which is</b></p> <p>14 <b>a large weapon, because obviously he was driving the</b></p> <p>15 <b>car, it usually goes down in the footwell and it would</b></p> <p>16 <b>then get fouled up in the brake pedal or the</b></p> <p>17 <b>accelerator, so he tends not to have that. So he would</b></p> <p>18 <b>use -- have his Glock always and possibly have a Taser</b></p> <p>19 <b>with him as well, but you will have to ask R116.</b></p> <p>20 THE CHAIRMAN: Thank you.</p> <p>21 MR MOSS: The expectation in these circumstances would be</p> <p>22 you don't have a Taser, W80 doesn't have a Taser, R116</p> <p>23 is most likely to have a Taser?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. Did you consider using the carbine that was in your</p> <p style="text-align: center;">Page 77</p> | <p>1 hands?</p> <p>2 <b>A. I could have -- what to strike his legs with the carbine</b></p> <p>3 <b>rather than --</b></p> <p>4 Q. Or discharging it?</p> <p>5 <b>A. No.</b></p> <p>6 Q. Why would you not consider that?</p> <p>7 <b>A. I couldn't see any threat, firearms threat, towards me</b></p> <p>8 <b>or any immediately threat either to me or a colleague</b></p> <p>9 <b>currently at that time, because I have lost his hands</b></p> <p>10 <b>out of my sight and I can't see his head, so I am just</b></p> <p>11 <b>purely going -- not on instinct, but I ... it is going</b></p> <p>12 <b>to be very strange for someone not to react as I want</b></p> <p>13 <b>them to react, but I was -- I didn't think at that stage</b></p> <p>14 <b>I was in imminent danger.</b></p> <p>15 Q. I appreciate every situation is different, and you can</p> <p>16 only speak for the situation you found yourself in and</p> <p>17 the decision that you made, but you believe that there</p> <p>18 is a gun in the car, you have got somebody who hasn't</p> <p>19 been compliant in the instructions you have given them</p> <p>20 and you now believe that they have intentionally put</p> <p>21 their hands out of view?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Why did that to you not amount to grounds for you to</p> <p>24 need to use your carbine?</p> <p>25 <b>A. Because I haven't seen myself or my colleagues in</b></p> <p style="text-align: center;">Page 78</p> |
| <p>1 <b>imminent danger. I can't see that there is a gun</b></p> <p>2 <b>pointed at me or one of my colleagues or that he is</b></p> <p>3 <b>physically reaching for a gun. I can't take any of</b></p> <p>4 <b>those chances unless I physically see it.</b></p> <p>5 Q. Let's look at the second point in time now, this is when</p> <p>6 you had Gokay Sogucakli on the floor, you lost sight of</p> <p>7 his hands and you feared that he was going for a gun --</p> <p>8 I think you said you believed he was going for a gun?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. At that point in time, what use of force options did you</p> <p>11 consider?</p> <p>12 <b>A. One was, again, kicking him to get his hands out.</b></p> <p>13 <b>One was making sure that he couldn't roll over,</b></p> <p>14 <b>because police officers have been shot, have been shot</b></p> <p>15 <b>in the past by -- by subjects rolling over, producing</b></p> <p>16 <b>a handgun from their waistband and shooting the</b></p> <p>17 <b>officers. I don't want that to happen, so I was</b></p> <p>18 <b>covering him with my firearm, so any movements, sudden</b></p> <p>19 <b>movements, with him rolling towards my direction and</b></p> <p>20 <b>producing a firearm, then I would have been able to</b></p> <p>21 <b>possibly shoot him first.</b></p> <p>22 Q. Do you recall if your safety was on or off at that</p> <p>23 point?</p> <p>24 <b>A. I can't recall.</b></p> <p>25 Q. Do you recall if your finger was on the trigger at that</p> <p style="text-align: center;">Page 79</p>    | <p>1 point?</p> <p>2 <b>A. It wouldn't have been fully on the trigger, it would</b></p> <p>3 <b>have been alongside the trigger.</b></p> <p>4 Q. Did you consider discharging your firearm whilst he had</p> <p>5 his hands out of view?</p> <p>6 <b>A. Not at that stage.</b></p> <p>7 Q. That was because you had enough time to react?</p> <p>8 <b>A. Yes, plus it is a natural reaction when people are</b></p> <p>9 <b>thrown on the floor to put their hands out to protect</b></p> <p>10 <b>their fall. I just want to make sure that that is what</b></p> <p>11 <b>he was doing.</b></p> <p>12 Q. It may be that is a natural reaction, but your evidence</p> <p>13 was that you thought he was going for a gun?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. That was not enough for to you need to discharge your --</p> <p>16 <b>A. No, it was not.</b></p> <p>17 Q. I am going to now show you a training document, IPC219.</p> <p>18 <b>A. Okay.</b></p> <p>19 Q. Another MPS training document, subject "Extraction from</p> <p>20 motor vehicles, refresher". You will see that the first</p> <p>21 learning outcome is to perform an extraction of subjects</p> <p>22 from a stationary vehicle, that is the situation you</p> <p>23 found yourself in?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. Is it training you recall undertaking?</p> <p style="text-align: center;">Page 80</p>   |

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|---|--|
| <p>1 <b>A. Yes, many times.</b></p> <p>2 Q. If you please go to page 4 of the document, and we are</p> <p>3 going to look at the top of the page when we get there,</p> <p>4 the extraction is described:</p> <p>5 "Operational experience has proven that the safest</p> <p>6 and most effective way of dealing with the subject</p> <p>7 inside the vehicle is to maintain the speed and surprise</p> <p>8 with controlled aggression and verbal stunning, as long</p> <p>9 as it is justified and necessary in the circumstances."</p> <p>10 Do you think, upon reflection, that by attempting to</p> <p>11 smash the window three times before moving on you didn't</p> <p>12 maintain speed and surprise?</p> <p>13 <b>A. I think we got -- I got to Mr Sogucakli as quickly as we</b></p> <p>14 <b>could, so speed I think was up there.</b></p> <p>15 <b>Surprise, obviously he has had the extra second that</b></p> <p>16 <b>I have moved from the front window to the rear window.</b></p> <p>17 <b>I think I have done as best as I can in these</b></p> <p>18 <b>circumstances.</b></p> <p>19 Q. Could you please read aloud the second paragraph on that</p> <p>20 page -- we can probably zoom in:</p> <p>21 "The second officer to arrive at the vehicle having</p> <p>22 cleared the rear cabin will, after ensuring that</p> <p>23 firearms cover is place onto the subject, stow their MP5</p> <p>24 or holster their Glock."</p> <p>25 Q. Just pausing there, MP5 is one option, you had an MCX</p> <p style="text-align: center;">Page 81</p> | <p>1 carbine?</p> <p>2 <b>A. Yes, this is probably an old document, weaponry systems</b></p> <p>3 <b>have moved on since this, so we now have different</b></p> <p>4 <b>weapons.</b></p> <p>5 Q. You would have been trained at that point to stow your</p> <p>6 carbine?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Please carry on.</p> <p>9 <b>A. "They will then open the door and taking hold of the</b></p> <p>10 <b>subject by the closest wrist to them pull their arm out</b></p> <p>11 <b>to 90 degrees. Initiating a straight armlock. This</b></p> <p>12 <b>should be done whilst standing beside the driver's door</b></p> <p>13 <b>post to ensure the officer stays outside of the cabin</b></p> <p>14 <b>area and fighting arc of the subject. The officer's</b></p> <p>15 <b>other hand should be above the elbow joint to complete</b></p> <p>16 <b>the armlock. They will tell the subject to get out of</b></p> <p>17 <b>the vehicle whilst levering them out using the armlock</b></p> <p>18 <b>and takedown technique, assisting them from the vehicle</b></p> <p>19 <b>and down to the ground to be detained. This should be</b></p> <p>20 <b>accompanied by the repeated commands of 'out, out, down,</b></p> <p>21 <b>down, down'."</b></p> <p>22 Q. If you please stop there.</p> <p>23 You described why you chose to do what you did, grab</p> <p>24 him by the head or collar or top of his body.</p> <p>25 You said that if you had chosen to grab him by the</p> <p style="text-align: center;">Page 82</p>   |
| <p>1 arm, he would fight against it. I think that was your</p> <p>2 evidence?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. That tactic that you have just read out there, is that</p> <p>5 what he would have fought against?</p> <p>6 <b>A. Possibly, it is very difficult, that is the perfect --</b></p> <p>7 <b>that is a perfect scenario, when you can open in</b></p> <p>8 <b>a training scenario, when you are in the middle of a car</b></p> <p>9 <b>park and you can go there and you can open all the doors</b></p> <p>10 <b>fully and you can stand in the places and you have got</b></p> <p>11 <b>enough room to stand there and pull the gentleman out or</b></p> <p>12 <b>lever him out using the armlock. This was not the case</b></p> <p>13 <b>in that situation.</b></p> <p>14 <b>So although that is best-case scenario, I couldn't</b></p> <p>15 <b>do what they wanted me to do, purely because of the</b></p> <p>16 <b>position of the vehicles.</b></p> <p>17 Q. You did have space, we know, to pull Gokay Sogucakli out</p> <p>18 of the vehicle and to put him down on to the floor and</p> <p>19 you did get him into an armlock at that point.</p> <p>20 <b>A. I pulled him to the rear of vehicle, not directly</b></p> <p>21 <b>outside the vehicle.</b></p> <p>22 Q. Could you not have pulled him to that position using the</p> <p>23 tactic you have just read out?</p> <p>24 <b>A. No, I could not have.</b></p> <p>25 Q. We read later in this document that another version of</p> <p style="text-align: center;">Page 83</p>       | <p>1 tactic involves putting one ring of your handcuffs on</p> <p>2 the nearest arm of the man that you are trying to get</p> <p>3 out of car and use a use of force technique to pull his</p> <p>4 arm out of the car and lever it against the pillar, you</p> <p>5 are aware of that option as well?</p> <p>6 <b>A. Yes, I am.</b></p> <p>7 Q. Could you have done that?</p> <p>8 <b>A. No, I could not.</b></p> <p>9 Q. Why not?</p> <p>10 <b>A. As SFO/CTSFOs, we don't carry the rigid handcuffs,</b></p> <p>11 <b>purely because they are very bulky and difficult to hide</b></p> <p>12 <b>in a covert manner. So if we are out -- because some of</b></p> <p>13 <b>our jobs are surveillance based and we need to mingle,</b></p> <p>14 <b>although very shortly in a crowd of people and these</b></p> <p>15 <b>objects are bulky, so we use -- instead we use plastic</b></p> <p>16 <b>cable ties to secure subjects that we have detained and</b></p> <p>17 <b>then at a later date these plastic ties are cut off and</b></p> <p>18 <b>rigid handcuffs are put in their place. That would have</b></p> <p>19 <b>taken an amount of time to do and if I think, as I have</b></p> <p>20 <b>said, that I thought the car was revving to go away,</b></p> <p>21 <b>that is why the Hatton gun was discharged, then that</b></p> <p>22 <b>would have taken far too long and the car would have</b></p> <p>23 <b>been gone and I would have lost my subject.</b></p> <p>24 Q. Would the fact that the car was revving have itself have</p> <p>25 been a reason not to use the tactic we are looking at on</p> <p style="text-align: center;">Page 84</p> |

21 (Pages 81 to 84)

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| <p>1 the screen that requires no equipment?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Why?</p> <p>4 <b>A. If is car is revving, one, possibly get out of the way</b></p> <p>5 <b>if you are in the way, because obviously your safety is</b></p> <p>6 <b>paramount, and it takes time to put on an armlock and</b></p> <p>7 <b>a wristlock and stand in the right place. If he is</b></p> <p>8 <b>wearing a seatbelt, for example, it is going to take</b></p> <p>9 <b>an awful long time to pull him out if he has a seat belt</b></p> <p>10 <b>on, it is not going to happen.</b></p> <p>11 Q. The tactic described here, is it not a matter of taking</p> <p>12 the subject's arm in two places, one with your left</p> <p>13 hand, one with the right hand, left hand near the wrist</p> <p>14 and right hand just above the elbow and pulling?</p> <p>15 <b>A. No.</b></p> <p>16 <b>Well, it is in the perfect world, I am carrying</b></p> <p>17 <b>a gun and I can't take -- I don't want to take my hand</b></p> <p>18 <b>off a gun that ... because I don't know what the man is</b></p> <p>19 <b>holding in his hand and that I can't see.</b></p> <p>20 Q. If you look at how the tactic is described here, you</p> <p>21 will see there is one other difficulty you were in, the</p> <p>22 first line of it:</p> <p>23 "The second officer to arrive will do this ..."</p> <p>24 What the tactic envisages is that one officer keeps</p> <p>25 firearms cover while the second gets hands on and does</p> <p style="text-align: center;">Page 85</p>   | <p>1 what we have been looking at. You didn't have that</p> <p>2 officer to give cover, did you?</p> <p>3 <b>A. No, I did not.</b></p> <p>4 Q. Let's look at another hypothetical, let's say that when</p> <p>5 W80 had said, "You move on", let's say in fact there had</p> <p>6 been someone else to go round to the door at the back of</p> <p>7 vehicle, so let's say you and W80 could have stayed at</p> <p>8 the front door of the vehicle. Could you two together</p> <p>9 have carried out this tactic in respect of the man,</p> <p>10 Jermaine Baker, in the front seat of the car?</p> <p>11 <b>A. If we had vision on him and if he was doing nothing with</b></p> <p>12 <b>his hands, yes, we could have done that, if -- it</b></p> <p>13 <b>wouldn't have looked at pretty as that describes,</b></p> <p>14 <b>because obviously there is no room for us to pull him</b></p> <p>15 <b>out of the car, because there is only 18 inches the car</b></p> <p>16 <b>door could open, so it wouldn't have looked anything</b></p> <p>17 <b>like that but we could have got him out.</b></p> <p>18 Q. If you had found yourself in a position where there were</p> <p>19 two of you at that door of the vehicle, would you or</p> <p>20 would W80, it doesn't matter which one of you, would one</p> <p>21 of you have stowed your primary weapon and holstered</p> <p>22 your Glock?</p> <p>23 <b>A. Only after we had seen that the subjects were doing</b></p> <p>24 <b>exactly as we had asked them to.</b></p> <p>25 Q. You wouldn't do what is described on the screen</p> <p style="text-align: center;">Page 86</p> |
| <p>1 immediately, it wouldn't be a go to tactic?</p> <p>2 <b>A. My go to tactic is get anybody out of the car as quickly</b></p> <p>3 <b>as possible, it is the safest thing for them to do,</b></p> <p>4 <b>otherwise the longer they stay in the car, the car</b></p> <p>5 <b>driver might do something stupid and people are going to</b></p> <p>6 <b>get injured and that what we are trying to avoid.</b></p> <p>7 Q. If you and W80 had found yourself in that position,</p> <p>8 would you have known automatically which one of you was</p> <p>9 going to holster the weapon and which one of you was</p> <p>10 going to get hands on, would you need to discuss it?</p> <p>11 <b>A. No, but if hypothetically you are saying it would have</b></p> <p>12 <b>been me because I am the right side of the door. W80</b></p> <p>13 <b>would be the other side of the door, so it would be</b></p> <p>14 <b>easier for me to get hands on Jermaine Baker if he was</b></p> <p>15 <b>sat in that seat and we managed to open the door and he</b></p> <p>16 <b>did exactly as we said.</b></p> <p>17 Q. Thank you.</p> <p>18 Sir, I am now going to move on to explore the</p> <p>19 medical care that was given to Jermaine Baker. I don't</p> <p>20 know whether that is something that everyone wants to be</p> <p>21 here for. But before that I don't know whether you want</p> <p>22 to ask the officer any questions about his use of force</p> <p>23 before we change topic?</p> <p>24 THE CHAIRMAN: No, thank you.</p> <p>25 MS MURPHY: If we might have a few moments, sir, we will not</p> <p style="text-align: center;">Page 87</p> | <p>1 be long.</p> <p>2 THE CHAIRMAN: That is all right. Thank you. Yes.</p> <p>3 MR MOSS: S111, you had Gokay Sogucakli on the floor. Did</p> <p>4 you leave him with one of your colleagues?</p> <p>5 <b>A. Two of my colleagues.</b></p> <p>6 Q. Why did you do that?</p> <p>7 <b>A. Because I heard the shout of "medic". I had two -- as</b></p> <p>8 <b>I was detaining Mr Sogucakli on the floor, two of my</b></p> <p>9 <b>colleagues came to assist in the Plasticuffing of him</b></p> <p>10 <b>and it was during that time that there was a shout of</b></p> <p>11 <b>a medic put up and that is when I left him to go round</b></p> <p>12 <b>to where the shout of medic was coming from.</b></p> <p>13 Q. You have already described the impressive degree of</p> <p>14 training which you had. Were there any equally trained</p> <p>15 or better trained medics there?</p> <p>16 <b>A. Yes, we have numerous -- we are probably quite top heavy</b></p> <p>17 <b>on our team of medics, purely because we can do a lot of</b></p> <p>18 <b>training, so we probably have four or five trained</b></p> <p>19 <b>medics on my team.</b></p> <p>20 Q. We know now it was Jermaine Baker who needed the medic,</p> <p>21 where was he?</p> <p>22 <b>A. At the time --</b></p> <p>23 Q. Would it help to look at --</p> <p>24 <b>A. No, not at all. He was basically in front of his car.</b></p> <p>25 <b>The front of the car, he was being pulled out by R116</b></p> <p style="text-align: center;">Page 88</p>   |

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|---|---|
| <p>1 <b>and W80, I imagine, and pulled round and R116 was doing</b></p> <p>2 <b>first aid, he was laid out basically directly in front</b></p> <p>3 <b>of his car, the car he was in, towards the bonnet.</b></p> <p>4 Q. Was he in the middle of the car, was he nearer the</p> <p>5 driver's side or the passenger side?</p> <p>6 <b>A. He was near the passenger side.</b></p> <p>7 Q. Which way round the car did you go to get to him?</p> <p>8 <b>A. I went round -- so pulled my man out of the rear</b></p> <p>9 <b>nearside and I ran round the bonnet passing two open</b></p> <p>10 <b>doors on the driver's side, the rear passenger and the</b></p> <p>11 <b>driver's door, and then went round to assist at the</b></p> <p>12 <b>front of the car.</b></p> <p>13 Q. What did you see when you got to him?</p> <p>14 <b>A. As I ran round the car or when I got to front of the</b></p> <p>15 <b>car?</b></p> <p>16 Q. When you got it where he was on the floor?</p> <p>17 <b>A. I saw 116, R116, over a male, and the male was lying</b></p> <p>18 <b>face up, and he had a balaclava pulled down, and 116 had</b></p> <p>19 <b>his hand pressed down towards his upper -- lower</b></p> <p>20 <b>throat/upper chest area.</b></p> <p>21 Q. Had R116 cut Jermaine Baker's clothing off him by that</p> <p>22 point?</p> <p>23 <b>A. Not at that moment in time.</b></p> <p>24 Q. Did he shortly afterwards?</p> <p>25 <b>A. Yes, he did.</b></p> <p style="text-align: center;">Page 89</p>  | <p>1 Q. Did you make any attempts to assist?</p> <p>2 <b>A. Yes, I helped. He shouts he wants a med kit, I then</b></p> <p>3 <b>open up one of the med kits and get some scissors out</b></p> <p>4 <b>and 116 asked me to cut the clothing off.</b></p> <p>5 Q. After that, did you seek to use an Asherman seal?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. What is that?</p> <p>8 <b>A. Asherman seal is a round seal and it is used for sealing</b></p> <p>9 <b>chest wounds. What you don't want to do is you don't</b></p> <p>10 <b>want to get air into your chest, because air will come</b></p> <p>11 <b>into your chest and start to kind of crush your lung,</b></p> <p>12 <b>which means you cannot breathe. So what we are trying to</b></p> <p>13 <b>do is we can let air out of the area but not in. So it</b></p> <p>14 <b>is a chest -- it is a seal you put over the wound, and</b></p> <p>15 <b>basically it stops air coming into that wound and it is</b></p> <p>16 <b>stuck on the bare chest of the subject.</b></p> <p>17 Q. It is the same as when you cut a plaster in half, so</p> <p>18 that it is sticky on three sides and open on the fourth</p> <p>19 side?</p> <p>20 <b>A. No, it is sticky all the way round with a valve directly</b></p> <p>21 <b>in the middle, so as -- it is probably about six inches</b></p> <p>22 <b>across, sticky, and you put it straight over the wound,</b></p> <p>23 <b>so that air can escape, but when they breath in, they</b></p> <p>24 <b>are not breathing in any air from the outside into their</b></p> <p>25 <b>chest cavity.</b></p> <p style="text-align: center;">Page 90</p>       |
| <p>1 Q. I think it is right, this it is not something that is in</p> <p>2 a standard uniformed officer's kit that they carry with</p> <p>3 them, this is a specialist item that you had within your</p> <p>4 med kit?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Did it work?</p> <p>7 <b>A. No, it didn't. It needs to adhere to a dry skin</b></p> <p>8 <b>basically, so you should wipe the skin first of all to</b></p> <p>9 <b>get rid of any sweat or any blood, but unfortunately</b></p> <p>10 <b>there was just too much blood coming from Jermaine's</b></p> <p>11 <b>chest.</b></p> <p>12 Q. Even if you had more equipment, I don't know what that</p> <p>13 equipment would be, would it have been possible to dry</p> <p>14 his chest enough to stick on?</p> <p>15 <b>A. No, we tried with the Asherman and we then tried with</b></p> <p>16 <b>what is called a Russell chest seal, it does the same</b></p> <p>17 <b>job, it is just a square/rectangular one. We dried it</b></p> <p>18 <b>profusely the area and as soon as we took our hand off,</b></p> <p>19 <b>or R116 took his hand off, for us to lay the chest seal</b></p> <p>20 <b>on it, blood started to gurgle out and it just wouldn't</b></p> <p>21 <b>adhere to the skin.</b></p> <p>22 Q. In the sequence of events you describe in your statement</p> <p>23 between the Asherman seal and the Russell seal, you talk</p> <p>24 about trying to insert an airway. Is that the correct</p> <p>25 of events or do you think you did the two seals first?</p> <p style="text-align: center;">Page 91</p> | <p>1 <b>A. No, we try and maintain the airway and we understand</b></p> <p>2 <b>that someone lying on their back will become</b></p> <p>3 <b>unconscious, their tongue will basically just slip back</b></p> <p>4 <b>into your throat and you can choke, so an oropharyngeal</b></p> <p>5 <b>airway is an airway that you can put in to basically</b></p> <p>6 <b>keep your tongue in the right position so you don't</b></p> <p>7 <b>choke and it keeps your airway open, and unfortunately,</b></p> <p>8 <b>it is like a J, the shape of a J and it is a plastic</b></p> <p>9 <b>object you put in upside down and you twist it.</b></p> <p>10 <b>Unfortunately, unless you are really unconscious,</b></p> <p>11 <b>you have the gag reflex and you cannot take it.</b></p> <p>12 Q. Had you believed that Mr Baker was unconscious?</p> <p>13 <b>A. We believed he was unconscious so we tried to insert it,</b></p> <p>14 <b>but unfortunately he rejected it.</b></p> <p>15 Q. Did try at a later point to insert it again?</p> <p>16 <b>A. I can't remember if we did -- I can't remember, sorry.</b></p> <p>17 Q. Had CPR been commenced at the point you just described,</p> <p>18 when you tried both the seals and the airway?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. Was CPR commenced by W112 and V112?</p> <p>21 <b>A. As I said, actually I've got the numbers wrong it was</b></p> <p>22 <b>not W112, it was P2.</b></p> <p>23 Q. W112 and P2?</p> <p>24 <b>A. No, it was R116 and P2. I have put W112, that is</b></p> <p>25 <b>a mistake on my part. He was there on the operation,</b></p> <p style="text-align: center;">Page 92</p> |

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| <p>1 <b>but it was P2 who was doing the first aid.</b></p> <p>2 Q. With R116?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. After that, did you use a special type of gauze?</p> <p>5 <b>A. Yes, it is a Celox gauze, basically there was so much</b></p> <p>6 <b>blood coming out from the wound so I decided we could</b></p> <p>7 <b>try and pack it to stop the bleeding. It is a gauze,</b></p> <p>8 <b>it's like a big huge long bit of ribbon and it is</b></p> <p>9 <b>impregnated with this thing called Celox, which is</b></p> <p>10 <b>a blood-clotting agent and what you do is you pack the</b></p> <p>11 <b>wound with that, and then over a period of time the</b></p> <p>12 <b>blood clots and that stops any blood coming out.</b></p> <p>13 Q. Did you do this?</p> <p>14 <b>A. Yes, I did.</b></p> <p>15 Q. Did it work?</p> <p>16 <b>A. Blood stopped coming out, but we think that was because</b></p> <p>17 <b>there was very little left.</b></p> <p>18 Q. At some point, did somebody put Jermaine Baker on</p> <p>19 oxygen?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Was that oxygen from your medic kit or from another</p> <p>22 medic kit?</p> <p>23 <b>A. It would have been from our medic kit.</b></p> <p>24 Q. Do you know who did that, I don't think you say so in</p> <p>25 your statement?</p> <p style="text-align: center;">Page 93</p>   | <p>1 <b>A. No, it would have been either 116 -- no, I don't know</b></p> <p>2 <b>who has done it, sorry, I am not going to guess.</b></p> <p>3 Q. Did there come a time when you called for HEMS?</p> <p>4 <b>A. Yes, I think that was done quite early on -- I know</b></p> <p>5 <b>I have mentioned it later on in my statement, but</b></p> <p>6 <b>I think it was probably even before, as we realised</b></p> <p>7 <b>Mr -- or Jermaine had been shot, I think the call would</b></p> <p>8 <b>have gone in very early for LAS and HEMS.</b></p> <p>9 Q. Did you specifically call for HEMS, or did you call</p> <p>10 for --</p> <p>11 <b>A. I called for HEMS, and ...</b></p> <p>12 Q. As opposed to LAS?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Why?</p> <p>15 <b>A. HEMS come with trained surgeons onboard, I understood --</b></p> <p>16 <b>I now know it was a gunshot and we needed lifesaving</b></p> <p>17 <b>treatment at the scene.</b></p> <p>18 Q. You suspect that a call went in earlier than the time at</p> <p>19 which you called for HEMS --</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. -- were you aware at the time of anyone else calling for</p> <p>22 HEMS?</p> <p>23 <b>A. No, I was not.</b></p> <p>24 Q. Did there come a time when LAS arrived?</p> <p>25 <b>A. Yes, LAS arrived, yes.</b></p> <p style="text-align: center;">Page 94</p>  |
| <p>1 Q. Did they arrive before HEMS?</p> <p>2 <b>A. Yes, they did.</b></p> <p>3 Q. Was the defibrillator used after LAS arrived?</p> <p>4 <b>A. Yes it was.</b></p> <p>5 Q. And did later a HEMS doctor arrive?</p> <p>6 <b>A. Yes, actually two HEMS doctor arrived.</b></p> <p>7 Q. Is it right that they were carried the last distance</p> <p>8 from their helicopter in a police car?</p> <p>9 <b>A. Yes, they were. Obviously they need to land somewhere</b></p> <p>10 <b>and a police car was commandeered to give them a lift to</b></p> <p>11 <b>the scene as quickly as possible.</b></p> <p>12 Q. After that time did you then speak with W80?</p> <p>13 <b>A. Yes, I asked -- it wasn't clear to me who had shot</b></p> <p>14 <b>Mr Baker, so I had asked 116 was he the shooter and he</b></p> <p>15 <b>said no, and I asked W80, who was still at the rear of</b></p> <p>16 <b>the vehicle helping us with first said, was he the</b></p> <p>17 <b>shooter and he said yes.</b></p> <p>18 Q. Had you realised at that point that there was no Hatton</p> <p>19 round?</p> <p>20 <b>A. No, I had not.</b></p> <p>21 Q. He said yes. Did he say anything more than yes?</p> <p>22 <b>A. Yes, he said the male was going for something in his</b></p> <p>23 <b>chest bag.</b></p> <p>24 Q. Did you ask any other questions?</p> <p>25 <b>A. No. I then went and told the team leader what -- S105,</b></p> <p style="text-align: center;">Page 95</p> | <p>1 <b>what W80 had told me.</b></p> <p>2 Q. I mean no criticism by this question at all I just want</p> <p>3 to understand. Why did you ask that question outside of</p> <p>4 the PIP? Was it important for you to know.</p> <p>5 <b>A. Yes, it was important for me because this is a firearms</b></p> <p>6 <b>incident, someone has been shot, we are not going to</b></p> <p>7 <b>cover up anything. So I just need to know who has fired</b></p> <p>8 <b>the shot, has one of us fired it or has it come from</b></p> <p>9 <b>elsewhere? I need to clear -- that needs to be cleared</b></p> <p>10 <b>up. It was a question that I had to ask.</b></p> <p>11 Q. It is normal, isn't it, that you didn't ask any more</p> <p>12 detailed questions outside the PIP?</p> <p>13 <b>A. No.</b></p> <p>14 Q. That is normal?</p> <p>15 <b>A. No, it is normal not to ask any more questions.</b></p> <p>16 Q. Finally, I am just going to ask you to look at some</p> <p>17 records which help us time when medical help was called</p> <p>18 for?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. I know this is not something you prepared personally,</p> <p>21 but I am just going to ask you to confirm whether the</p> <p>22 records fit with the evidence that you have given.</p> <p>23 The first is MPS474, page 1.</p> <p>24 I think this is a police CAD document, CAD1252 of</p> <p>25 11 December 2015.</p> <p style="text-align: center;">Page 96</p> |



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|---|--|
| <p>1 <b>A. Yes.</b></p> <p>2 Q. I think you have a hard copy as well as the one on the</p> <p>3 screen?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. This is essentially a running log of calls and other</p> <p>6 electronic messages from the control room; is that</p> <p>7 right?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. If we go to page 3 of this document, we will see</p> <p>10 an entry at 9.03.52.</p> <p>11 What we see there is LAS, then a circumflex symbol,</p> <p>12 and then MPS, does that mean that a message was passed</p> <p>13 to the LAS from the MPS?</p> <p>14 <b>A. Yes.</b></p> <p>15 <b>I am not a CAD operator, so I am not quite sure how</b></p> <p>16 <b>these are formatted, but I imagine so.</b></p> <p>17 Q. Does it appear from what you are see in front of you,</p> <p>18 I recognise you are not a CAD operator, that</p> <p>19 DCI Williams was the caller, you see FE16, the cipher</p> <p>20 for Mr Williams?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. The chief complaint is said to be gunshots?</p> <p>23 <b>A. Correct.</b></p> <p>24 Q. If we move on to 9.05.10 on page 4, we can see a message</p> <p>25 going the other way, just hanging off the top of the</p> <p style="text-align: center;">Page 97</p>  | <p>1 page there, to MPS from LAS, message processed</p> <p>2 successfully.</p> <p>3 Then you can see 9.05.10:</p> <p>4 "Is Olympus Grove the RVP?"</p> <p>5 That's a message sent by the LAS to the MPS, can you</p> <p>6 see that?</p> <p>7 <b>A. Yes, I can.</b></p> <p>8 Q. If we move down to 9.05.23, that is the first mention of</p> <p>9 HEMS, we see HEMS as well, please.</p> <p>10 That is a message said between SI and COS, it</p> <p>11 doesn't matter for this purpose who they are, but those</p> <p>12 appear to be police references, don't they?</p> <p>13 <b>A. I have no idea who SI and COS are, so I couldn't tell</b></p> <p>14 <b>you if they were police or not, sorry.</b></p> <p>15 Q. If we go down to 9.07.52, DI10 and SI, DI probably a</p> <p>16 detective inspector, is that likely?</p> <p>17 <b>A. No, you are going to have to get a CAD operator.</b></p> <p>18 Q. We can see here a request, please confirm LAS and HEMS</p> <p>19 have been called, so clearly they were not with you by</p> <p>20 that point?</p> <p>21 <b>A. No.</b></p> <p>22 Q. If we go to 9.10.08, I think we are now over the page --</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. -- in the middle of the page?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 98</p>   |
| <p>1 Q. To the MPS from the LAS, HEMS activated by M, that is</p> <p>2 9.10?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Finally one last document, LAA3.</p> <p>5 It's definitely not a document you can answer for,</p> <p>6 this is an NHS document, the HEMS mission report, but</p> <p>7 just to confirm that this corroborates what we have seen</p> <p>8 on the CAD, we see in the top half of the page, the 999</p> <p>9 call was received at 9.03, you can see that?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. HEMS were activated at 9.09, you see that?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. That seems to be slightly earlier than on the CAD, which</p> <p>14 was the message being put on at 9.10, but consistent?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. Finally, HEMS are said to be on scene at 9.22?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Does that fit with your recollection?</p> <p>19 <b>A. Yes it does.</b></p> <p>20 MR MOSS: Sir, I have no further questions but I was passed</p> <p>21 one which I have mislaid but I have found again,</p> <p>22 I think.</p> <p>23 If you please go to IPC219, one more time. We dealt</p> <p>24 with the point that this is a lesson plan concerned with</p> <p>25 when two officers are able to deal with a subject?</p> <p style="text-align: center;">Page 99</p> | <p>1 <b>A. Yes.</b></p> <p>2 Q. Is it right that it is to deal with a single subject in</p> <p>3 a vehicle?</p> <p>4 <b>A. The subject is "Extraction of subjects from motor</b></p> <p>5 <b>vehicles", I am not quite sure, it says equipment</b></p> <p>6 <b>required: three stooge vehicles, three stooges, one per</b></p> <p>7 <b>vehicle. Yes, it is.</b></p> <p>8 Q. If we please go to COP4, page 26, we will see</p> <p>9 a paragraph that begins, "Where an extraction is to be</p> <p>10 conducted ..."</p> <p>11 Could you please read that paragraph, the second on</p> <p>12 the page?</p> <p>13 <b>A. "Where an extraction is to be conducted, it remains</b></p> <p>14 <b>largely the same as described in module 3. However,</b></p> <p>15 <b>given the resources of a MASTS team it may be possible</b></p> <p>16 <b>to deal with several subjects in a vehicle</b></p> <p>17 <b>simultaneously."</b></p> <p>18 Q. We have seen the lesson plan to do with one subject, we</p> <p>19 have seen this reference that it may be possible with</p> <p>20 a MASTS team, which was there, to deal with several</p> <p>21 subjects simultaneously. What difference does it make</p> <p>22 in practical terms if you are approaching a vehicle with</p> <p>23 one person in it or with multiple people in it?</p> <p>24 <b>A. As long as you have got enough police officers to deal</b></p> <p>25 <b>with the amount of people that are in the car, then it</b></p> <p style="text-align: center;">Page 100</p> |

25 (Pages 97 to 100)

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|---|---|
| <p>1 <b>is -- you are okay. You wouldn't -- could you just</b></p> <p>2 <b>rephrase that question?</b></p> <p>3 Q. The question I am asked to ask is: what difference does</p> <p>4 it make to the tactic if there is one subject or</p> <p>5 multiple subjects?</p> <p>6 <b>A. Only because it is going to look slightly untidy. Where</b></p> <p>7 <b>you put down one subject might be exactly where another</b></p> <p>8 <b>subject is going to go down very, very shortly, so it --</b></p> <p>9 <b>you may have to move your subject to a different</b></p> <p>10 <b>location, otherwise they are going to go down beside</b></p> <p>11 <b>each other. That is about it, really. I mean we have</b></p> <p>12 <b>got enough officers to deal with things that are</b></p> <p>13 <b>happening there, it is a tactic we do, we arrest</b></p> <p>14 <b>numerous people when they are three, four, five up in</b></p> <p>15 <b>a car.</b></p> <p>16 <b>It just looks slightly untidy, because there are</b></p> <p>17 <b>people lying on the floor, getting handcuffed, so you</b></p> <p>18 <b>would use the same tactics. It just wouldn't look very</b></p> <p>19 <b>nice.</b></p> <p>20 Q. You had enough people to deal with this?</p> <p>21 <b>A. We had more than enough people, yes.</b></p> <p>22 MR MOSS: Sir, I have finished, do you have any other</p> <p>23 questions?</p> <p>24 Sir, if I could ask one more question on this</p> <p>25 document, if we can zoom out, Mr Coates, and then</p> <p style="text-align: center;">Page 101</p> | <p>1 I think zoom into the paragraph we will see below, but</p> <p>2 we cannot see now, the paragraph beginning, "Due to the</p> <p>3 complex nature of deployments ..."</p> <p>4 Could you please read that paragraph aloud, S111?</p> <p>5 <b>A. Yes:</b></p> <p>6 <b>"Due to the complex nature of such deployments, and</b></p> <p>7 <b>the numerous potential scenarios, it is not possible to</b></p> <p>8 <b>provide definitive guidance as to which officer from</b></p> <p>9 <b>which MASTS vehicle will deal with particular subjects.</b></p> <p>10 <b>However there are a number of general principles which</b></p> <p>11 <b>apply. Officers should prioritise the driver and/or any</b></p> <p>12 <b>other subjects who presents the greatest threat.</b></p> <p>13 <b>Officers from the centre vehicle deal with the subjects</b></p> <p>14 <b>on the side on which this police vehicle is positioned.</b></p> <p>15 <b>Officers from the rear vehicle deal with subjects on the</b></p> <p>16 <b>opposite side to the centre vehicle."</b></p> <p>17 Q. Asking you the question again now that you have the full</p> <p>18 context to it, what difference does it make to the</p> <p>19 tactic if there is one tactic or if there are multiple</p> <p>20 subjects?</p> <p>21 <b>A. One subject is going to come out of only one door, so we</b></p> <p>22 <b>know which door he is going to come out of. It has to</b></p> <p>23 <b>be the driver's door, but obviously we have got numerous</b></p> <p>24 <b>subjects, they are coming out of different doors. This</b></p> <p>25 <b>isn't -- I think this relates to a stop where our</b></p> <p style="text-align: center;">Page 102</p> |
| <p>1 <b>vehicles are positioned in a different manner. But --</b></p> <p>2 <b>yes, we had enough people to deal with everyone there.</b></p> <p>3 Q. One more paragraph underneath that.</p> <p>4 <b>A. Okay.</b></p> <p>5 Q. Then we promise we will release you.</p> <p>6 <b>A. "Whilst these general principles would normally apply it</b></p> <p>7 <b>is acknowledged that on occasional environmental or</b></p> <p>8 <b>operational considerations may require a different</b></p> <p>9 <b>approach."</b></p> <p>10 Q. Environmental considerations, the fact that the silver</p> <p>11 car is close to the Audi?</p> <p>12 <b>A. Silver car is close, we cannot put them down there, so</b></p> <p>13 <b>we had to do as best we can with the scenario.</b></p> <p>14 Q. Did you think you did do --</p> <p>15 <b>A. Yes, I put my subject down in the only place I could</b></p> <p>16 <b>have put him down which was at the rear of the vehicle,</b></p> <p>17 <b>as close to the vehicle as possible.</b></p> <p>18 MR MOSS: S111, thank you for your time.</p> <p>19 Sir, unless you have any other questions --</p> <p>20 Questions from THE CHAIRMAN</p> <p>21 THE CHAIRMAN: Yes, I wonder if we can go right back to the</p> <p>22 beginning and the briefing that took place on the 10th.</p> <p>23 The briefing which you were led to believe was being</p> <p>24 attended by W80 as the representatives --</p> <p>25 <b>A. Correct, sir.</b></p> <p style="text-align: center;">Page 103</p>  | <p>1 THE CHAIRMAN: -- of the firearms officers.</p> <p>2 <b>A. Yes, sir.</b></p> <p>3 THE CHAIRMAN: Who decided that he should effectively</p> <p>4 represent you all?</p> <p>5 <b>A. I think he was asked to go by S105, because he knew the</b></p> <p>6 <b>most about the job, only because he had done the recce</b></p> <p>7 <b>of the car park and he had had boots on the ground,</b></p> <p>8 <b>basically.</b></p> <p>9 THE CHAIRMAN: Who said that this was a meeting or</p> <p>10 a briefing just for commanders, with the exception of</p> <p>11 W80?</p> <p>12 <b>A. I am not quite sure, sir. I am led to believe that was</b></p> <p>13 <b>said -- you would have to speak to S48 or S105, I think,</b></p> <p>14 <b>to get the ultimate answer from that.</b></p> <p>15 THE CHAIRMAN: None of you were under -- when I say none of</p> <p>16 you, none of you CTSFOs were under the impression that</p> <p>17 your attendance was expected?</p> <p>18 <b>A. No, sir.</b></p> <p>19 THE CHAIRMAN: Indeed, far from it.</p> <p>20 <b>A. Yes, it is not usually the done thing, because we would</b></p> <p>21 <b>be getting the same briefing 14 hours apart. Why waste</b></p> <p>22 <b>our time when we could be doing other more important</b></p> <p>23 <b>things.</b></p> <p>24 THE CHAIRMAN: I understand that, but the inquiry has heard</p> <p>25 evidence that the tactical firearms commander wanted as</p> <p style="text-align: center;">Page 104</p>   |

26 (Pages 101 to 104)

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| <p>1 many firearms officers as possible to attend that<br/>2 briefing. Does that surprise you?<br/>3 <b>A. Not really. But there is a common sense -- common sense<br/>4 is put to it. If they require us just to go to<br/>5 a meeting or briefing, and we are going to get three<br/>6 hours' sleep, that is not very commonsensical when we<br/>7 are going to hear exactly the same thing at 5.00 am and<br/>8 we can get as much sleep as possible.</b><br/>9 THE CHAIRMAN: It rather looks as though he was not told<br/>10 that W80 was there as the representative, if he was<br/>11 disappointed that only one had attended.<br/>12 <b>A. Yes, probably, sir.</b><br/>13 THE CHAIRMAN: Would you have expected him to be told that<br/>14 W80 was there as the rep for the --<br/>15 <b>A. No, I thought there may have been --</b><br/>16 THE CHAIRMAN: Let me finish.<br/>17 As the rep of the CTSFOs?<br/>18 <b>A. So there may have been a role call from the beginning,<br/>19 when it says, "Who is here from each certain<br/>20 department?" And then W80 would have said, "I am here<br/>21 representing the CTSFOs".</b><br/>22 THE CHAIRMAN: That of course, didn't happen. Those who<br/>23 were there attended, but there was, so it would appear,<br/>24 no register like there used to be at school.<br/>25 <b>A. No.</b></p> <p style="text-align: center;">Page 105</p>  | <p>1 THE CHAIRMAN: Right.<br/>2 Anything arising from that?<br/>3 Further questions from MR MOSS<br/>4 MR MOSS: Just one point, sir, if I may. It is this.<br/>5 S111, you said -- I'm paraphrasing your evidence --<br/>6 what would be the point going it that briefing when I am<br/>7 going it hear the same thing next day at 5.00 am?<br/>8 <b>A. Yes.</b><br/>9 Q. I am paraphrasing DCI Williams' evidence, I hope<br/>10 accurately, when I say that the reason he wanted the<br/>11 briefing to happen on Thursday, 10th, is because he<br/>12 wanted everyone to be in the room together so they<br/>13 understood how their roles in the operation worked with<br/>14 everyone else's roles in the operation and that they<br/>15 would all work better because of it.<br/>16 Do you think that is a fair comment from<br/>17 Mr Williams?<br/>18 <b>A. I think that might be the corporate way of doing things,<br/>19 everyone wants to know, they want to tick all the boxes<br/>20 so everyone know what everyone else is doing.<br/>21 Unfortunately, it cannot always work that way<br/>22 because he couldn't have every single firearms officer<br/>23 there, because some were late turn doing life at risk<br/>24 jobs, so he hasn't got those amount of officers, he<br/>25 might have a few doing annual leave, a few officers on</b></p> <p style="text-align: center;">Page 106</p> |
| <p>1 <b>annual leave or a few people taking the day off, so<br/>2 I don't think they are always going to get all the<br/>3 officers that they require.</b><br/>4 <b>I understand that he wants to tick the box saying<br/>5 that everyone knows exactly what everyone else is doing,<br/>6 but I think it is impractical to want that.</b><br/>7 THE CHAIRMAN: With respect, that is not what happened on<br/>8 this occasion.<br/>9 It is not a case of every other officer being unable<br/>10 to attend, it is a case of no other officer being<br/>11 expected to attend, which was not what he wanted or<br/>12 expected. Do you understand?<br/>13 <b>A. Yes. So you are going to have to take that up with --</b><br/>14 THE CHAIRMAN: I appreciate that. You were as near to being<br/>15 there without being there, if you know what I mean.<br/>16 <b>A. Yes.</b><br/>17 THE CHAIRMAN: Because at least you knew about it.<br/>18 <b>A. Yes.</b><br/>19 THE CHAIRMAN: Thank you.<br/>20 MR MOSS: Forget whether it is practical for everyone else<br/>21 to be there, would you personally have benefited from<br/>22 knowing what everyone else was doing that day in the<br/>23 wider operation?<br/>24 <b>A. Would I have benefited from -- possibly. Did I need to<br/>25 go? Probably not. Because W80 was there as a voice for</b></p> <p style="text-align: center;">Page 107</p> | <p>1 <b>us and he would have told us anything the following day.<br/>2 That was changing from his, what he had heard.</b><br/>3 MR MOSS: Thank you.<br/>4 Sir that is now the last question, and, sir, we<br/>5 think if you can find it in yourself to be hungry it<br/>6 would be convenient to take an early lunch now.<br/>7 THE CHAIRMAN: Right. Shall we resume at 1.30?<br/>8 MR MOSS: Yes, please.<br/>9 THE CHAIRMAN: Thank you very much.<br/>10 Thank you very much indeed, S111.<br/>11 (12.31 pm)<br/>12 (The Luncheon Adjournment)<br/>13 (1.30 pm)<br/>14 THE CHAIRMAN: Yes.<br/>15 MS MCNEILL: Sir, our next witness is known as V68. Can the<br/>16 witness please be sworn?<br/>17 THE CHAIRMAN: Yes.<br/>18 V68 (sworn)<br/>19 Questions from MS MCNEILL<br/>20 MS MCNEILL: Good afternoon, can I please confirm, are you<br/>21 known by the cipher V68?<br/>22 <b>A. Yes, that's correct.</b><br/>23 Q. Are you a police constable in the Metropolitan Police?<br/>24 <b>A. Yes, sir.</b><br/>25 Q. In 2015, were you a CTSFO in SCO19?</p> <p style="text-align: center;">Page 108</p>  |

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|---|--|
| <p>1 <b>A. Yes, that's correct.</b></p> <p>2 Q. Can you please summarise for us your experience as</p> <p>3 a police officer as at December 2015?</p> <p>4 <b>A. Yes, so I joined the Metropolitan Police Service in</b></p> <p>5 <b>2002. After that I held various roles, uniform roles,</b></p> <p>6 <b>on borough, and also public order policing before</b></p> <p>7 <b>I joined my first armed command. Whilst there I then</b></p> <p>8 <b>applied for the role of CTSFO, went through the various</b></p> <p>9 <b>selection processes, and courses, and at the time of</b></p> <p>10 <b>2015 I was a current operational CTSFO.</b></p> <p>11 Q. As of 2015, had you been a CTSFO for five years?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Can you help us, roughly in that time, how many times</p> <p>14 would you have deployed as a CTSFO?</p> <p>15 Not a precise number, don't worry.</p> <p>16 <b>A. Yeah, I couldn't tell you exactly, obviously how many</b></p> <p>17 <b>deployments, but numerous deployments.</b></p> <p>18 THE CHAIRMAN: 5, 10 a year?</p> <p>19 <b>A. At least, sir, yes.</b></p> <p>20 THE CHAIRMAN: Thank you.</p> <p>21 MS MCNEILL: Can you help us understand, of the deployments,</p> <p>22 what proportion of those would result in an intervention</p> <p>23 or an interception?</p> <p>24 <b>A. Again, that depends on the actual deployment itself,</b></p> <p>25 <b>clearly. And what the end result may be, we do</b></p> <p style="text-align: center;">Page 109</p> | <p>1 <b>deployments that we go on where we are on the point of</b></p> <p>2 <b>deployment but actually nothing happens and we come away</b></p> <p>3 <b>from that but then we go away to it another time.</b></p> <p>4 <b>So the proportion, out of let's say 10 a year, it</b></p> <p>5 <b>might be 5 -- it totally depends.</b></p> <p>6 Q. Roughly half? Or thereabouts?</p> <p>7 <b>A. That is a pure estimate and a pure guess.</b></p> <p>8 Q. That is fine.</p> <p>9 I am going to ask you questions specific to</p> <p>10 Operation Ankaa. You have provided a number of witness</p> <p>11 statements but, sir, the most useful for our purposes is</p> <p>12 behind tab 4 of the bundle in front of you.</p> <p>13 Can you tell us when you became aware of Operation</p> <p>14 Ankaa?</p> <p>15 <b>A. I think that was on 8 December, I was told that myself</b></p> <p>16 <b>and the members of my team would be deploying on that or</b></p> <p>17 <b>assisting on that operation. Assisting another team</b></p> <p>18 <b>which was obviously later in the week.</b></p> <p>19 Q. I have given you the wrong tab, tab 3 is the most useful</p> <p>20 at this stage.</p> <p>21 On 8 December, who told you that you would be part</p> <p>22 of this deployment?</p> <p>23 <b>A. So at the time that would have been my team leader,</b></p> <p>24 <b>because I was part of a separate team supplementing the</b></p> <p>25 <b>one that deployed on this operation. So my team leader</b></p> <p style="text-align: center;">Page 110</p> |
| <p>1 <b>would have spoken to the likes of S105, in relation to</b></p> <p>2 <b>resourcing, who have then told me in my role on that</b></p> <p>3 <b>team at the time.</b></p> <p>4 Q. Was your team leader S105?</p> <p>5 <b>A. No, sorry, it was a separate team leader, not S105.</b></p> <p>6 THE CHAIRMAN: Who was your team leader?</p> <p>7 <b>A. I don't know his cipher.</b></p> <p>8 THE CHAIRMAN: Okay.</p> <p>9 MS MCNEILL: But for these purposes, you were in a slightly</p> <p>10 different team to the remainder of the CTSFOs -- the</p> <p>11 majority of the CTSFOs who deployed in Ankaa?</p> <p>12 <b>A. Yes, that's correct.</b></p> <p>13 Q. You were brought in to assist?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. On 8 December, were you told anything about the</p> <p>16 operation or just that you would be deploying on</p> <p>17 11 December?</p> <p>18 <b>A. Only that it was a confidential operation, and no</b></p> <p>19 <b>further details were given because of the nature of our</b></p> <p>20 <b>role that week as well. I wouldn't expect to be told</b></p> <p>21 <b>any details around that, at that stage.</b></p> <p>22 Q. I am looking at page 1 of your witness statement, you</p> <p>23 say, is it right, that you were due to work late shifts</p> <p>24 that week? Tab 3, first page.</p> <p>25 <b>A. Yes, that's correct.</b></p> <p style="text-align: center;">Page 111</p>   | <p>1 Q. The times of your late shift were from 2.00 pm to</p> <p>2 roughly 10.00 pm?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Did you help in booking hotel rooms for yourself and for</p> <p>5 others on the night of 10 December?</p> <p>6 <b>A. Yes, I did. That was for myself and members of the team</b></p> <p>7 <b>that I was actually on.</b></p> <p>8 Q. Your actual team?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. So other members of your team that had been brought in</p> <p>11 to assist with the operation?</p> <p>12 <b>A. Yes, that's correct.</b></p> <p>13 Q. You would stay in the hotel, was that to allow you to</p> <p>14 get a greater period of rest before the operation?</p> <p>15 <b>A. Yes, it was, and we had access to those straight away.</b></p> <p>16 <b>Near enough.</b></p> <p>17 Q. Can you tell us the hours that you were working on</p> <p>18 10 December?</p> <p>19 <b>A. On 10 December, that was -- it was 2 till 10, so 1400 to</b></p> <p>20 <b>2200, those were the hours of shift, when we had access</b></p> <p>21 <b>to our rooms at the hotel, but the caveat to that was we</b></p> <p>22 <b>needed to be immediately deployable for any other</b></p> <p>23 <b>firearms deployments, whether that be threat to life or</b></p> <p>24 <b>counter terrorism and such like.</b></p> <p>25 Q. Are you saying that you were working from 2.00 pm till</p> <p style="text-align: center;">Page 112</p>   |

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| <p>1 10.00 or on call, for want of a better word?</p> <p>2 <b>A. Basically, yes.</b></p> <p>3 Q. Because you were not called out, you in reality were in</p> <p>4 your hotel room?</p> <p>5 <b>A. Yes, no further deployment. We didn't get any further</b></p> <p>6 <b>deployments that night at all, so yes.</b></p> <p>7 Q. Were you aware whether or not there was a briefing being</p> <p>8 held on 10 December in relation to the operation the</p> <p>9 next day?</p> <p>10 <b>A. No, not --</b></p> <p>11 THE CHAIRMAN: It follows from that that you were not</p> <p>12 invited to attend it?</p> <p>13 <b>A. No, sir.</b></p> <p>14 THE CHAIRMAN: Thank you.</p> <p>15 MS MCNEILL: Generally speaking, how often would you receive</p> <p>16 any briefing for an operation prior to the day of</p> <p>17 deployment?</p> <p>18 <b>A. Prior to the day of deployment, in my experience, you</b></p> <p>19 <b>don't get a separate briefing prior to that at all. The</b></p> <p>20 <b>only involvement you might have is if you are involved</b></p> <p>21 <b>in the planning of that operation, in which case</b></p> <p>22 <b>obviously you would be privy to a lot more early on.</b></p> <p>23 Q. From your experience, it is usual practice to have your</p> <p>24 first briefing on the day of your deployment in any</p> <p>25 event?</p> <p style="text-align: center;">Page 113</p>   | <p>1 <b>A. Yes, the tactical briefing, first briefing.</b></p> <p>2 Q. Turning then to 11 December, did you attend the 3.00 am</p> <p>3 briefing at Leman Street?</p> <p>4 <b>A. Yes, I did.</b></p> <p>5 MS MCNEILL: Sir, you will remember that is the briefing</p> <p>6 that was delivered by V64, W97 and W80, we heard</p> <p>7 yesterday.</p> <p>8 Was that the first time you received any information</p> <p>9 about the operation?</p> <p>10 <b>A. Yes, it was.</b></p> <p>11 Q. Were you assigned to act as the front-seat passenger in</p> <p>12 what is described as the Charlie Car?</p> <p>13 <b>A. Yes, that's correct.</b></p> <p>14 Q. What was the role of the Charlie Car?</p> <p>15 <b>A. So that was obviously -- in our MASTS configuration we</b></p> <p>16 <b>have Alpha, Bravo and Charlie and the crews in those</b></p> <p>17 <b>cars. The roles specific to those vehicles sort of</b></p> <p>18 <b>mirror each other, so my particular role, as you say,</b></p> <p>19 <b>was front-seat passenger, so I would be responsible for</b></p> <p>20 <b>monitoring the communications, following the operation</b></p> <p>21 <b>on a map as well.</b></p> <p>22 Q. Okay.</p> <p>23 The Charlie Car was one of the MASTS configuration,</p> <p>24 the car itself was not the Control Car, was it?</p> <p>25 <b>A. No, it wasn't Control.</b></p> <p style="text-align: center;">Page 114</p>   |
| <p>1 Q. It didn't have any other specific responsibilities?</p> <p>2 <b>A. Not at that time. During the operation, during any</b></p> <p>3 <b>deployment, we could be asked to do various other</b></p> <p>4 <b>things, ie look at addresses and things like that,</b></p> <p>5 <b>depending on the job but at that time, that is the</b></p> <p>6 <b>standard configuration.</b></p> <p>7 THE CHAIRMAN: Can I just enquire as to this, please. You</p> <p>8 have told us you were assigned as the front-seat</p> <p>9 passenger to Charlie Car.</p> <p>10 <b>A. Yes, sir.</b></p> <p>11 THE CHAIRMAN: Does that mean that when you attended the</p> <p>12 briefing on the morning of 11th you were told at that</p> <p>13 time that that was going to be your car and your role,</p> <p>14 or were you told which car you were going to be in and</p> <p>15 left to decide between the occupants of the car who had</p> <p>16 which role?</p> <p>17 Do you understand the difference?</p> <p>18 <b>A. Yes, sir, I can clarify that, so where the postings are</b></p> <p>19 <b>put up in the -- in our crew room, you would be assigned</b></p> <p>20 <b>your vehicle, so there would be three officers in that</b></p> <p>21 <b>vehicle who are all suitably qualified in every role --</b></p> <p>22 THE CHAIRMAN: Yes.</p> <p>23 <b>A. -- and then between the three of you, you might then</b></p> <p>24 <b>decide who does what.</b></p> <p>25 THE CHAIRMAN: That is what I wondered, so in fact you were</p> <p style="text-align: center;">Page 115</p> | <p>1 assigned to a vehicle and then decided amongst the three</p> <p>2 of you who had been assigned to the vehicle who had</p> <p>3 which role?</p> <p>4 <b>A. Yes, sir. My correction, assigned to the vehicle not to</b></p> <p>5 <b>the actual role.</b></p> <p>6 THE CHAIRMAN: Thank you.</p> <p>7 MS MCNEILL: That is absolutely fine.</p> <p>8 If we could go back to talk a little bit about the</p> <p>9 briefing and it is dealt with in your witness statement</p> <p>10 at the bottom of page 1, tab 3. You say:</p> <p>11 "Intelligence had been received that the person</p> <p>12 detained had been planning to get other people to break</p> <p>13 him out of the prison whilst en route to the court and</p> <p>14 escape from lawful custody. In addition, the people</p> <p>15 that were going to do this would use firearms to</p> <p>16 facilitate his release. I was told that the subjects</p> <p>17 that were going to do this had access to a stolen black</p> <p>18 Audi estate and that various technical assets had been</p> <p>19 deployed on the car, and this would give us an</p> <p>20 up-to-date location of the car and also enable other</p> <p>21 officers to listen to what was going on inside the car."</p> <p>22 Was it your understanding from the briefing that the</p> <p>23 conspirators in the car would use a firearm as part of</p> <p>24 the plan?</p> <p>25 <b>A. Yes. According to what I had been told there, they</b></p> <p style="text-align: center;">Page 116</p> |

1 **would have access to firearms and use them to facilitate**  
 2 **that release.**  
 3 Q. You were expecting that they did have a firearm. Did  
 4 you distinguish in your mind between an imitation  
 5 firearm or a real firearm?  
 6 **A. At that point, no.**  
 7 Q. When you were told that they would use firearms to  
 8 facilitate the release, did that mean imitation or real  
 9 or imitation only or real only?  
 10 **A. For me, that would be real.**  
 11 Q. Real?  
 12 **A. Real firearms.**  
 13 Q. Again, was that because that was your interpretation of  
 14 what you were told?  
 15 **A. Yes.**  
 16 Q. At that stage, as you were receiving briefings, would  
 17 you have been assisted by understanding that  
 18 intelligence suggested that they were attempting to  
 19 source firearms as opposed to that they would use  
 20 firearms?  
 21 **A. Yes, any intelligence --**  
 22 Q. I will ask it in more detail.  
 23 Would you have been assisted by understanding that  
 24 a number of the individuals associated with the  
 25 breakout, were --

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1 the vehicle?  
 2 **A. That was for my use.**  
 3 Q. Following that, did you attend the Lincoln Road Patrol  
 4 Base for a 5.00 am briefing?  
 5 **A. Yes, that's correct.**  
 6 Q. Looking at page 2 of your witness statement, can you  
 7 assist us with the essential points that you took away  
 8 from the 5.00 am briefing?  
 9 **A. Yes, sir, so there was the two people that had been**  
 10 **previously arrested for having possession of a firearm,**  
 11 **whilst they were travelling on a motorbike. They had**  
 12 **pleaded guilty to those offences and were awaiting**  
 13 **sentencing.**  
 14 **Those two people, previously known to police, have**  
 15 **access to or can facilitate getting firearms, and in**  
 16 **that briefing I do remember one of those weapons was**  
 17 **an automatic firearm.**  
 18 **The subject in custody was obviously facilitating**  
 19 **and communicating to facilitate his release.**  
 20 **And that other people unknown to the operation were**  
 21 **going to be used to stop the prison van and again**  
 22 **facilitate that release.**  
 23 Q. Thank you.  
 24 During that briefing, you indicate that they  
 25 outlined things like tactics to be used.

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1 I will read it exactly from our gist.  
 2 Would you have been assisted by detail that the  
 3 intelligence indicated that a number of individuals  
 4 associated with the wider Operation Utara, including at  
 5 least one individual associated with Operation Ankaa,  
 6 which was the breakout, were attempting to source  
 7 firearms?  
 8 **A. That would have reaffirmed what I was being told in the**  
 9 **briefing.**  
 10 Q. Would that have changed in any way your understanding of  
 11 that briefing?  
 12 **A. No.**  
 13 Q. Thank you.  
 14 THE CHAIRMAN: Part of the bigger intelligence picture?  
 15 **A. Yes, sir.**  
 16 THE CHAIRMAN: Yes.  
 17 MS MCNEILL: Following that briefing, did you sign out your  
 18 equipment?  
 19 **A. Yes, I did.**  
 20 Q. What equipment did you have with you on that day?  
 21 **A. So I had my Glock SLP, which is a sidearm that we carry,**  
 22 **and my SIG MCX carbine and a Taser, and all the**  
 23 **associated ammunition with that as well.**  
 24 Q. In relation to the Taser, did you specifically sign out  
 25 and carry a Taser for your use or was that Taser within

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1 At the conclusion of that briefing, did you know for  
 2 sure what would happen at the point of any intervention  
 3 or interception or was it presented in terms of the  
 4 options available?  
 5 **A. So in relation to the briefing there, the OFC would have**  
 6 **run through how the MASTS would be configured and how we**  
 7 **would deploy and how that would work in conjunction with**  
 8 **surveillance.**  
 9 **If you are talking about the tactic at that point of**  
 10 **interception, then in my mind, that was going to be**  
 11 **an enforced stop extraction on that vehicle.**  
 12 Q. In your mind it was going to be an enforced stop and  
 13 extraction?  
 14 **A. Yes, bearing in mind the information and intelligence we**  
 15 **had received.**  
 16 Q. Can you explain why in your mind that was the tactic  
 17 that would be used?  
 18 **A. Yes, certainly, obviously going off the information and**  
 19 **intelligence, and the fact that the subjects would have**  
 20 **access to firearms and were believed to be in possession**  
 21 **of firearms. The fact that they are about to go and do**  
 22 **what they were going to do, release a prisoner from the**  
 23 **prison van. And if we look at the criteria for**  
 24 **an extraction option, this is from me personally now, so**  
 25 **the anticipation on compliance of any subjects within**

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1 that vehicle, I, for my understanding and how I looked  
 2 at it, that was highlighted to be the case. The  
 3 anticipated escape of the subjects in the car and,  
 4 again, on point of contact for us, then I think that  
 5 would be a highly likely. And also the ability to  
 6 isolate them. Obviously at that point we didn't know  
 7 where the car was or where the car would end up, so it  
 8 at least hit two of those criteria at that point in the  
 9 briefing for me personally.  
 10 Again, given the access that they would have to  
 11 firearms and how we would need to isolate them from  
 12 members of the public, bearing in mind the location  
 13 around London and places like that, we would need to  
 14 implement -- I would be questioning any other tactic  
 15 that we had done.  
 16 Q. In your experience, had you seen contain and call out as  
 17 a tactic used in relation to subjects in vehicles?  
 18 A. Have I personally used it? No.  
 19 Q. No. In your experience, is an armed extraction the most  
 20 commonly used tactic in relation to subjects in  
 21 vehicles?  
 22 A. Well, commonly used tactic, I wouldn't say that.  
 23 I would say that it is an option that is obviously  
 24 clearly used. All options from armed enquiry,  
 25 containment and call out, all up to critical shot can be

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1 of the individual involved, that is obviously important  
 2 as well. So obviously they are determined to carry out  
 3 their role, that the plan has not just been spoken  
 4 about, it has actually been enacted by them -- or they  
 5 want to enact that plan. So with all those factors and  
 6 the fact that firearms were going to be used to  
 7 facilitate this offence, that is why my risk assessment  
 8 was very high.  
 9 Q. Just so that it is clear what we are talking about, when  
 10 you talk about high or very high, is that at the point  
 11 of any interception or intervention or throughout the  
 12 operation?  
 13 A. It was very high then and obviously I would be assessing  
 14 that myself throughout the operation.  
 15 Q. Can we just turn to tab 4 of your bundle, please, and  
 16 page 2 of that witness statement.  
 17 You indicate in the second sentence:  
 18 "What I do remember is that for me personally, my  
 19 risk assessment was at the highest it has ever been for  
 20 an operation. What I mean by that is I believe from  
 21 what I had been told these subjects were very dangerous  
 22 individuals, who had no problem sourcing firearms and  
 23 that to break someone out of a prison van would require  
 24 extreme force to be used. I believed that these people  
 25 would use firearms to do this, and when confronted by

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1 used. Obviously including extraction within that.  
 2 But that just depends on the deployment and  
 3 obviously the direction that we may be given, given the  
 4 information and intelligence into the TFC and the OFC.  
 5 Q. Understanding completely that it is situation specific,  
 6 the question is -- you say you haven't used or seen used  
 7 a contain and call out for subjects in vehicles?  
 8 A. No.  
 9 Q. The question is purely in your experience, have you seen  
 10 extraction used most often, of the options available,  
 11 for subjects in vehicles?  
 12 A. Yes. Yes.  
 13 Q. Okay.  
 14 I want to talk about the risk assessment, as it was  
 15 presented to you at that stage in the briefing.  
 16 What was your assessment of the risk of this  
 17 operation?  
 18 A. For me personally, it was high or very high in relation  
 19 to the -- why we were there, why the subjects were  
 20 there.  
 21 Q. Can you explain why you thought that the risk was high  
 22 or very high?  
 23 A. Yes, because the whole intent of the operation was to  
 24 break someone free from a prison van. So for me that  
 25 would require extreme force to be used. And the mindset

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1 police, I honestly believe that they would use them  
 2 against us to escape."  
 3 That part of your statement, does that refer to your  
 4 state of mind at the conclusion of the briefings?  
 5 A. Yes, it does.  
 6 Q. Was your assessment of the risk as the highest it has  
 7 been for an operation based on the information given  
 8 about the gang that was involved and the weapons they  
 9 had used in the past?  
 10 A. Yes, that is correct.  
 11 Obviously this is the first operation of this kind  
 12 that I have come across whereby the intention is there  
 13 for something which would take extreme force to be used  
 14 to complete. So yes.  
 15 Q. You indicated that the risk assessment was given by the  
 16 TFC during the tape-recorded briefing.  
 17 We understand that the assessment wasn't at that  
 18 stage high. Did you query in any way the corporate risk  
 19 assessment for the operation, or was it your role to do  
 20 so?  
 21 A. No, I didn't query it at all. The TFC's corporate risk  
 22 assessment is -- I see it as totally different to mine.  
 23 And the way that they assess risk and threat, obviously  
 24 they have a process they follow in line with the SFC's  
 25 working strategy as well. So if they are assessing it,

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| <p>1 <b>let's say prior to the operation, then they will assess</b></p> <p>2 <b>it how they would, but that wouldn't be the same as my</b></p> <p>3 <b>deploying on to the vehicle. So I see it as two</b></p> <p>4 <b>separate things.</b></p> <p>5 THE CHAIRMAN: Were you told that the corporate assessment</p> <p>6 is different from how you yourself feel?</p> <p>7 <b>A. I haven't been told that, sir, no.</b></p> <p>8 THE CHAIRMAN: What was the relevance, as far as you were</p> <p>9 concerned, of the corporate risk assessment?</p> <p>10 <b>A. The relevance would be as -- so the TFC's understanding</b></p> <p>11 <b>of the risks involved at certain points within the</b></p> <p>12 <b>operation, so the way that I understand it is on the</b></p> <p>13 <b>planning of the operation, for example, the TFC might</b></p> <p>14 <b>assess everything as low for example, but that is</b></p> <p>15 <b>a continuous risk assessment. So I would expect that to</b></p> <p>16 <b>change depending totally on what type of deployment we</b></p> <p>17 <b>are on.</b></p> <p>18 THE CHAIRMAN: It is not really relevant to your role, is</p> <p>19 it?</p> <p>20 <b>A. Not to me, sir, no.</b></p> <p>21 THE CHAIRMAN: Or to anyone in your position?</p> <p>22 <b>A. No, sir.</b></p> <p>23 THE CHAIRMAN: Thank you.</p> <p>24 MS MCNEILL: Just before we move on to moving towards</p> <p>25 Quicksilver. We have heard a lot of evidence from</p> <p style="text-align: center;">Page 125</p> | <p>1 others about the difference between an intervention and</p> <p>2 an interception.</p> <p>3 Do you know the difference between the two?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. I don't expect you to explain it, don't worry.</p> <p>6 For a CTSFO on the ground, does it make</p> <p>7 a significant practical difference to your role as to</p> <p>8 whether something is an intervention or an interception?</p> <p>9 <b>A. Does it a make a significant difference?</b></p> <p>10 Q. Does it change what you do?</p> <p>11 <b>A. No, not necessarily.</b></p> <p>12 Q. Not necessarily.</p> <p>13 Is your role focused predominantly then on what you</p> <p>14 see in front of you and the tactics to be deployed at</p> <p>15 the point of either an intervention or an interception?</p> <p>16 <b>A. Yes. Obviously one being prior to the commission of the</b></p> <p>17 <b>offence, but one could be intervening to save life</b></p> <p>18 <b>essentially, so --</b></p> <p>19 Q. Is it less about the definition and more about the</p> <p>20 circumstances that you are in at that point?</p> <p>21 <b>A. Yes, I would say so.</b></p> <p>22 Q. Following the briefing at 5.00 am, did you move to</p> <p>23 Quicksilver Patrol Base?</p> <p>24 <b>A. Yes, that's correct.</b></p> <p>25 Q. You might be helped by going back to tab 3, that is the</p> <p style="text-align: center;">Page 126</p>   |
| <p>1 more detailed statement.</p> <p>2 About the bottom third of the page.</p> <p>3 What were you doing whilst you were waiting at</p> <p>4 Quicksilver Patrol Base?</p> <p>5 <b>A. So whilst waiting outside there, I remember we would</b></p> <p>6 <b>certainly be monitoring all the communications and</b></p> <p>7 <b>keeping an eye on -- I'd have a map book open and I'd be</b></p> <p>8 <b>keeping an eye on where the various elements were.</b></p> <p>9 Q. Can I just pause you there, you said keeping an eye on</p> <p>10 where various elements were --</p> <p>11 <b>A. As in -- it is obviously where the subject vehicle was,</b></p> <p>12 <b>where the movement was. In my mind I did not have</b></p> <p>13 <b>an idea of maybe where our other team were, who were</b></p> <p>14 <b>with the prison van, but at that moment in time it was</b></p> <p>15 <b>just monitoring where the subject vehicle was.</b></p> <p>16 Q. Is that based on the information coming through the</p> <p>17 radio from the surveillance teams?</p> <p>18 <b>A. Yes, it is.</b></p> <p>19 Q. Whilst you were in the front passenger seat, you hear</p> <p>20 the radio communications coming through?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Did you hear -- I am looking at some of your evidence,</p> <p>23 please, at the bottom of page 2 -- any information from</p> <p>24 the surveillance team about the number of occupants</p> <p>25 inside the vehicle?</p> <p style="text-align: center;">Page 127</p> | <p>1 <b>A. Yes.</b></p> <p>2 <b>As I have written in my statement, I remember it had</b></p> <p>3 <b>been said there could be four occupants inside.</b></p> <p>4 Q. Were you given any information about the manner in which</p> <p>5 the black Audi was driving?</p> <p>6 <b>A. Yes, it was -- some erratic driving was being conveyed</b></p> <p>7 <b>by the surveillance team, whereby the Audi had overtaken</b></p> <p>8 <b>at that point a couple of cars and then, as I said, in</b></p> <p>9 <b>my experience I didn't expect that to be a form of</b></p> <p>10 <b>anti-surveillance but, again to see -- it may provoke</b></p> <p>11 <b>an overt police response, given the manner of their</b></p> <p>12 <b>driving.</b></p> <p>13 <b>That is what was being relayed to me over the</b></p> <p>14 <b>working channel.</b></p> <p>15 Q. Did you receive any information from the surveillance</p> <p>16 team as to when the vehicle came to a stop in Bracknell</p> <p>17 Close?</p> <p>18 Were you made aware it had come to a stop, I should</p> <p>19 just say?</p> <p>20 <b>A. Yes, at the time -- sorry, at the time of recollection,</b></p> <p>21 <b>because then -- I thought it was Bracknell Close, yes,</b></p> <p>22 <b>but obviously it was.</b></p> <p>23 Q. Once you were aware that the vehicle had stopped in</p> <p>24 Bracknell Close, can you help us with how much</p> <p>25 information you were able to receive from the</p> <p style="text-align: center;">Page 128</p> |



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| <p>1 surveillance team about the surrounding environment<br/>2 within Bracknell Close?<br/>3 <b>A. I do remember that various things were coming out and</b><br/>4 <b>I haven't written out what was said, because obviously</b><br/>5 <b>I can only recall certain bits but in relation to that,</b><br/>6 <b>around the same time, I wrote there about there being</b><br/>7 <b>lookouts around the local area as well.</b><br/>8 Q. You heard information to suggest there was a lookout?<br/>9 <b>A. Yes, and I believe as well then it was conveyed that</b><br/>10 <b>the -- about how the car was parked in Bracknell Close.</b><br/>11 Q. How it was parked, in relation to how close it was to<br/>12 other vehicles?<br/>13 <b>A. As in where it was in the parking space, facing out.</b><br/>14 Q. Okay.<br/>15 Were you aware before you arrived at Bracknell<br/>16 Close, so whilst you were still waiting at Quicksilver,<br/>17 of how close the vehicle, the Audi vehicle, was to any<br/>18 other vehicles and/or whether there was anything else in<br/>19 the area, such as builders or members of the public?<br/>20 <b>A. I couldn't recall that at the time.</b><br/>21 Q. Did you receive any information about whether or not the<br/>22 windows of the vehicle were steamed up?<br/>23 <b>A. Yes.</b><br/>24 Q. Why was that relevant to pass to you?<br/>25 <b>A. Well, obviously it came from surveillance team, it is</b></p> <p style="text-align: center;">Page 129</p> | <p>1 <b>relevant for us, obviously, because of vision inside the</b><br/>2 <b>vehicle and obviously it would be relevant to them to</b><br/>3 <b>try to identify occupants inside the vehicle as well.</b><br/>4 Q. Would whether or not you could see into the vehicle be<br/>5 one of the factors that you would build into your<br/>6 ongoing risk assessment?<br/>7 <b>A. Yes.</b><br/>8 Q. How would it affect that risk assessment?<br/>9 <b>A. Yes, it would.</b><br/>10 Q. Sorry, how?<br/>11 <b>A. Sorry, how?</b><br/>12 Q. How would it affect your risk assessment?<br/>13 <b>A. Well if you don't have vision on potentially armed</b><br/>14 <b>subjects in the vehicle, so it does affect your own</b><br/>15 <b>personal risk assessment because it makes it more</b><br/>16 <b>dangerous if I cannot see into a vehicle with</b><br/>17 <b>potentially armed subjects, then clearly we are in more</b><br/>18 <b>danger than if I could do, if I could see what was in</b><br/>19 <b>there.</b><br/>20 Q. During that time did you receive information over the<br/>21 radio to say that the offence would be firearms enabled?<br/>22 <b>A. Yes.</b><br/>23 Q. Is the phrase "firearms enabled" a phrase you have<br/>24 encountered before?<br/>25 <b>A. No.</b></p> <p style="text-align: center;">Page 130</p>   |
| <p>1 Q. What did you understand the phrase firearms enabled to<br/>2 mean?<br/>3 <b>A. So in that particular day, obviously, because of the</b><br/>4 <b>assets that have being deployed on to the Audi, the</b><br/>5 <b>control room -- other officers had full access as to</b><br/>6 <b>what was being done or said inside the car. So to say</b><br/>7 <b>that, they would need to believe that the occupants</b><br/>8 <b>definitely had firearms on them. And bearing in mind</b><br/>9 <b>what they were there to do, in my mind then, I was</b><br/>10 <b>convinced that not only did they have firearms on them,</b><br/>11 <b>they would have them essentially ready to go and</b><br/>12 <b>waiting. So in their hands.</b><br/>13 Q. Just to draw out from that a little bit, please.<br/>14 Did you interpret firearms enabled to mean they<br/>15 definitely had firearms?<br/>16 <b>A. To me that was definitely they had firearms in that car.</b><br/>17 Q. Did that indicate real firearms or imitation firearms in<br/>18 your mind?<br/>19 <b>A. In my mind real firearms.</b><br/>20 Q. Was it your understanding at the time that that<br/>21 intelligence was coming from the individuals who were<br/>22 listening to the car, listening to the probe inside the<br/>23 car?<br/>24 <b>A. Yes, that's correct.</b><br/>25 Q. Bearing in mind it had, in your mind, come from within</p> <p style="text-align: center;">Page 131</p>  | <p>1 the car, how much weight did you give to the<br/>2 intelligence coming through the radio that there would<br/>3 definitely be real firearms?<br/>4 <b>A. Bearing in mind what we had been told prior to and as</b><br/>5 <b>well in the briefings, again, this OCN would have no</b><br/>6 <b>problem accessing firearms and ammunition as well.</b><br/>7 <b>That, coupled together with that terminology, as in</b><br/>8 <b>firearms enabled. It means yes, rather than there might</b><br/>9 <b>be an element of doubt before that but now, that is, to</b><br/>10 <b>me, there are firearms in that car.</b><br/>11 Q. So for you there was no longer an element of doubt?<br/>12 <b>A. No. No.</b><br/>13 Q. I think you said -- please correct me if I misheard<br/>14 you -- that in your mind it meant they had them in their<br/>15 hand ready to go, to that effect?<br/>16 <b>A. Yes, that's correct.</b><br/>17 Q. Again, why did you interpret firearms enabled to mean<br/>18 not only were they in the car, they were in their hands,<br/>19 they were ready to go?<br/>20 <b>A. So that all couples together with the identity, which we</b><br/>21 <b>don't know, at the time, the capability of the subjects</b><br/>22 <b>inside the car, and also their intention, which, for me,</b><br/>23 <b>that is quite high, they are quite organised as in to</b><br/>24 <b>try and pull off this offence. So in order to activate</b><br/>25 <b>their plan, they had to be at a state of readiness and</b></p> <p style="text-align: center;">Page 132</p> |

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| <p>1 <b>that time span was closing.</b></p> <p>2 <b>So in my mind, they are ready to deploy and such</b></p> <p>3 <b>onto what they want to do. So for that to happen, they</b></p> <p>4 <b>needed -- again, for me, they needed to have their</b></p> <p>5 <b>weapon out, not maybe in the boot or in bags or</b></p> <p>6 <b>something like that.</b></p> <p>7 Q. You indicated earlier in your evidence that at the</p> <p>8 conclusion of the briefings, your personal risk</p> <p>9 assessment was the highest it had been for any operation</p> <p>10 you had been on. You also said that you were</p> <p>11 continually conducting a risk assessment throughout the</p> <p>12 day?</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Upon receipt of this information, what was your risk</p> <p>15 assessment at this stage?</p> <p>16 <b>A. Well, for me I was convinced that firearms were there</b></p> <p>17 <b>and it is as high as it has got for a firearms operation</b></p> <p>18 <b>and now it is just as high, or obviously still at the</b></p> <p>19 <b>same level.</b></p> <p>20 <b>We still have a job to do, so we do accept</b></p> <p>21 <b>an element of risk in that.</b></p> <p>22 THE CHAIRMAN: But you had certainly not heard anything that</p> <p>23 reduced the risk assessment?</p> <p>24 <b>A. Not for me personally, sir, no.</b></p> <p>25 THE CHAIRMAN: If anything it had gone up?</p> <p style="text-align: center;">Page 133</p>   | <p>1 <b>A. If anything it had gone up, sir, yes.</b></p> <p>2 MS MCNEILL: Did this confirm what you had understood to be</p> <p>3 the likelihood at the conclusion of the briefing, namely</p> <p>4 that there would be firearms in the car?</p> <p>5 <b>A. Yes, sir. Yes.</b></p> <p>6 Q. Okay. I preface this by I know I am asking you</p> <p>7 a hypothetical, okay?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. If the information that came over the radio was not</p> <p>10 firearms enabled, if the information had come over the</p> <p>11 radio that intelligence from the car was that there was</p> <p>12 an imitation firearm within the car, is that something</p> <p>13 that you would have found useful to be passed to you?</p> <p>14 <b>A. Essentially no, but I will explain why that would be.</b></p> <p>15 Q. Please do.</p> <p>16 <b>A. Because obviously, to say -- to be 100 per cent sure</b></p> <p>17 <b>that there is an imitation firearm in that car and that</b></p> <p>18 <b>is all there is and nothing else, then clearly that</b></p> <p>19 <b>would change the direction of the operation in its</b></p> <p>20 <b>entirety.</b></p> <p>21 <b>To -- for that information to come across is not</b></p> <p>22 <b>an issue for me personally but it certainly wouldn't</b></p> <p>23 <b>affect my risk assessment at that time because, although</b></p> <p>24 <b>there might be information and intelligence to say there</b></p> <p>25 <b>is an imitation firearm in the car, there is nothing to</b></p> <p style="text-align: center;">Page 134</p>   |
| <p>1 <b>discount any other firearms or weapons being in that car</b></p> <p>2 <b>and I suppose, given the fact that we have full control</b></p> <p>3 <b>inside that car, that information might have come from</b></p> <p>4 <b>a subject within the car, but then what experience do</b></p> <p>5 <b>they have of a firearm, they might have just been handed</b></p> <p>6 <b>it. So ultimately we don't know, I don't know.</b></p> <p>7 THE CHAIRMAN: You assume the worst case scenario?</p> <p>8 <b>A. Yes, sir.</b></p> <p>9 <b>I sort of equate that to the -- obviously the</b></p> <p>10 <b>terrorist attacks in London in relation to suicide vests</b></p> <p>11 <b>that are used and where we have deployed onto them, and</b></p> <p>12 <b>if we deploy to further operations like that, do we then</b></p> <p>13 <b>assume that because both those suits were essentially</b></p> <p>14 <b>fake, does that lessen our risk assessment as we deploy</b></p> <p>15 <b>onto the next job? I think that is a very --</b></p> <p>16 THE CHAIRMAN: Can I put the question another way.</p> <p>17 Was there anything that you could have been told</p> <p>18 which would have reduced your risk assessment, short of</p> <p>19 being told that the operation was no longer going ahead?</p> <p>20 <b>A. Given the information and intelligence that I had at</b></p> <p>21 <b>that time, no, sir, for me.</b></p> <p>22 THE CHAIRMAN: Thank you.</p> <p>23 MS MCNEILL: Moving on then, please, were you aware of state</p> <p>24 amber being declared?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 135</p> | <p>1 Q. What did you understand that to mean?</p> <p>2 <b>A. And again, so state amber was called and then to me, as</b></p> <p>3 <b>I have stated previously, my understanding was we were</b></p> <p>4 <b>going to conduct an enforced stop extraction on that</b></p> <p>5 <b>vehicle.</b></p> <p>6 <b>Or an extraction -- I have said enforced stop</b></p> <p>7 <b>extraction, but it would be an extraction, whether they</b></p> <p>8 <b>be natural or enforced.</b></p> <p>9 Q. To be clear, did anyone say to you that an extraction</p> <p>10 would be performed or was that the natural consequence</p> <p>11 of state amber being declared in your mind?</p> <p>12 <b>A. No, it is by process of elimination, it wasn't said --</b></p> <p>13 <b>to answer your question, it wasn't said to me but by</b></p> <p>14 <b>a process of elimination on all the other elements we</b></p> <p>15 <b>have and all the other options that we have, for example</b></p> <p>16 <b>compliant -- obviously you have compliant, natural and</b></p> <p>17 <b>enforced and in with that armed enquiry, containment and</b></p> <p>18 <b>call out, extraction and critical shots, as we have</b></p> <p>19 <b>previously said.</b></p> <p>20 <b>So, for me, you can discount most of them given the</b></p> <p>21 <b>scenario we were in at the time, it is not going to be</b></p> <p>22 <b>an armed enquiry in my eyes.</b></p> <p>23 Q. For completeness. I know you say you can discount them,</p> <p>24 can you just explain to us why you discounted each one</p> <p>25 of those in that moment?</p> <p style="text-align: center;">Page 136</p> |

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| <p>1 <b>A. Given the fact that -- the information and intelligence</b><br/> 2 <b>now was that this was going to be firearms enabled, so</b><br/> 3 <b>for the reasons that I said a second ago around -- for</b><br/> 4 <b>me personally, my personal risk assessment, was that</b><br/> 5 <b>an armed enquiry wasn't suitable for this, because for</b><br/> 6 <b>me we know essentially they have got firearms in the</b><br/> 7 <b>car.</b></p> <p>8 <b>Containment and call out, again, if you look -- the</b><br/> 9 <b>elements we have spoken about previous, around the</b><br/> 10 <b>actions or anticipated actions of the occupants inside</b><br/> 11 <b>the car on the point of contact, and, as a result of</b><br/> 12 <b>them, that may present a danger to life. That element</b><br/> 13 <b>was there for me.</b></p> <p>14 <b>The second one was the anticipated escape attempt on</b><br/> 15 <b>contact with police, which bearing in mind what they are</b><br/> 16 <b>there to do, it could well be that as soon as they</b><br/> 17 <b>realised police officers are there, they may want to</b><br/> 18 <b>escape themselves. So that element was there as well</b><br/> 19 <b>and if they did break out, do they then endanger members</b><br/> 20 <b>of the public by doing so? Do they then continue on</b><br/> 21 <b>with their mission on the prison van? So that all these</b><br/> 22 <b>elements.</b></p> <p>23 <b>And then the -- we had then the information that the</b><br/> 24 <b>car was in Bracknell Close, so it is our ability then to</b><br/> 25 <b>isolate them from members of the public on the footway</b></p> <p style="text-align: center;">Page 137</p> | <p>1 <b>or wherever they are in that area and indeed the</b><br/> 2 <b>residential houses in there as well.</b></p> <p>3 <b>So the containment and call out option I don't think</b><br/> 4 <b>was there, because we couldn't effectively isolate the</b><br/> 5 <b>threat from members of the public and people nearby.</b></p> <p>6 <b>If I go back to the capability and intention aspect</b><br/> 7 <b>of the occupants in the vehicle, it becomes quite</b><br/> 8 <b>apparent, especially on previous deployments where we</b><br/> 9 <b>have enacted an enforced stop extraction, on</b><br/> 10 <b>a completely separate job, but the capability and</b><br/> 11 <b>intention of the occupants are such where they have made</b><br/> 12 <b>concerted efforts to break out of our vehicle option, if</b><br/> 13 <b>you like, so --</b></p> <p>14 Q. Are you talking about if you park the vehicles around to<br/> 15 block them in, they have tried to bash their way<br/> 16 through?</p> <p>17 A. Yes, so that was an actual enforced stop extraction we<br/> 18 have done there, so if we had have tried to do<br/> 19 a containment and call out in Bracknell Close, for me,<br/> 20 that would give the occupants of that vehicle time to<br/> 21 orchestrate -- whether that be shooting at us to try and<br/> 22 get away, use the vehicle to try and get out, then that<br/> 23 becomes really dangerous in my eyes. As I have<br/> 24 experienced before on firearms deployments. So to gain<br/> 25 control, close control, of those subjects and</p> <p style="text-align: center;">Page 138</p> |
| <p>1 <b>essentially immobilise that vehicle, in the environment</b><br/> 2 <b>we had, I think it is really important.</b></p> <p>3 Q. Can I understand, I do understand the reason you are<br/> 4 giving today as to why contain and call out was not<br/> 5 suitable. Were all of those factors ones that you were<br/> 6 aware of on the morning of 11 December at the point at<br/> 7 which state amber was declared?</p> <p>8 A. As in --</p> <p>9 Q. The environmental factors and the like?</p> <p>10 A. Even from just where it was parked and, yes, from where<br/> 11 it was parked and from what surveillance, from what<br/> 12 I have said in my statement, yes.</p> <p>13 Q. That sort of exercise you have demonstrated for us now<br/> 14 of running through your options and discounting them,<br/> 15 did you run through that exercise in your mind at the<br/> 16 time state amber was declared? Or were you expecting<br/> 17 that it would be an armed extraction in any event?</p> <p>18 A. So that assessment would be for me going on throughout,<br/> 19 and if there was a change in let's say intelligence, and<br/> 20 there was a -- which resulted in a change of tactic,<br/> 21 then almost certainly that would come via control to us<br/> 22 as a team.</p> <p>23 Q. If there had been a change in tactic, that would come<br/> 24 through?</p> <p>25 A. I would expect it to come through from control, yes.</p> <p style="text-align: center;">Page 139</p>   | <p>1 Q. Just so I understand, is that if they had specifically<br/> 2 wanted you to undertake a contain and call out, for<br/> 3 example you would expect specific instructions over the<br/> 4 radio to do a contain and call out?</p> <p>5 A. In that scenario, on that day, yes.</p> <p>6 Q. Did you not expect specific instructions over the radio<br/> 7 to say state amber, armed extraction --</p> <p>8 A. Not for that, no. And if I had have received<br/> 9 instructions to conduct contain and call out or anything<br/> 10 else, then for me, again for me personally, I would have<br/> 11 been questioning that --</p> <p>12 Q. Okay.</p> <p>13 A. -- for the reasons that I have said.</p> <p>14 Q. Was there any discussion in the vehicle, on state amber<br/> 15 being declared, amongst you, about the tactic that you<br/> 16 would use once you got to Bracknell Close?</p> <p>17 A. I can't remember specifically if anything was said.<br/> 18 I am guessing that we would have said if the car does<br/> 19 come out, then what do we do? Basically running through<br/> 20 some various options, but I can't recall specifically<br/> 21 what was discussed in the car.</p> <p>22 Q. Were you confident at the time that all of you were<br/> 23 expecting to conduct an armed extraction once you<br/> 24 reached Bracknell Close?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 140</p>  |

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| <p>1 Q. Before I move on to Bracknell Close, I am asked to ask<br/>2 you to go back to firearms enabled, just for one moment.<br/>3 You said you had never heard the term firearms enabled<br/>4 before.<br/>5 Did you think about asking somebody to explain to<br/>6 you what that meant?<br/>7 <b>A. I didn't think that was -- I didn't think I needed that<br/>8 explaining to me at that time. As in what firearms<br/>9 enabled meant to me, that is me then asking someone else<br/>10 to essentially influence what maybe I am thinking in my<br/>11 own personal risk assessment.<br/>12 I don't see why I would need that explaining, if<br/>13 that makes sense. Firearms enabled, that is my<br/>14 interpretation, my interpretation of that word and that<br/>15 phrase could be totally different to someone else's.</b><br/>16 Q. That I think is precisely the question, if the phrase<br/>17 firearms enabled comes over the radio and you have not<br/>18 heard it before, so you are interpreting what you think<br/>19 it means, and as you say if there is a risk everybody in<br/>20 the car has given a different interpretation, would it<br/>21 assist to go back and say, "Hang on a second, what do<br/>22 you mean 'firearms enabled'?"<br/>23 <b>A. Yeah, if we are talking in hindsight, of course we can<br/>24 discuss different elements --</b><br/>25 THE CHAIRMAN: Did you think there was any need to do so?</p> <p style="text-align: center;">Page 141</p> | <p>1 <b>A. I didn't think so, sir, no.</b><br/>2 THE CHAIRMAN: Was there any discussion between any of you<br/>3 in the car as to what that expression meant?<br/>4 <b>A. No, sir.</b><br/>5 THE CHAIRMAN: Did you think everybody understood it?<br/>6 <b>A. Yes, sir.</b><br/>7 MS MCNEILL: Thank you, sir.<br/>8 As you make your way around Bracknell Close, to<br/>9 Bracknell Close, was there any discussion about who<br/>10 would go where upon arrival in Bracknell Close, "I will<br/>11 go to the driver's side, you go to the passenger" or<br/>12 anything to that effect?<br/>13 <b>A. No, and the reason being we have to be very fluid around<br/>14 that sort of stuff, because we essentially, until we are<br/>15 out of the vehicle, we don't really know where we might<br/>16 end up and that could depend on all sorts of factors,<br/>17 members of the public, the actions of the subjects, the<br/>18 car maybe moving slightly, and we have to deal with that<br/>19 at the time of deployment from the vehicle.</b><br/>20 Q. Can I ask you to take a look, please, at page 2 of your<br/>21 statement, at tab 4. You go back to your risk<br/>22 assessment, as you approach the Audi, and again, as you<br/>23 fairly said at the beginning, you are continuously<br/>24 performing this risk assessment.<br/>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 142</p> |
| <p>1 Q. You arrive in Bracknell Close and you said:<br/>2 "When I approached the Audi, I had no vision inside<br/>3 at all."<br/>4 Pause there, is that because the windows were<br/>5 steamed up?<br/>6 <b>A. Yes, it was.</b><br/>7 Q. "... from listening to surveillance I believed there<br/>8 were at least three people in the car."<br/>9 Again, pausing, at that stage did you know for sure<br/>10 how many people were in the car?<br/>11 <b>A. No.</b><br/>12 Q. But at least three was your understanding?<br/>13 <b>A. At least three.</b><br/>14 Q. "... who I believed to be in possession of a firearm."<br/>15 Which we have covered:<br/>16 "Because I couldn't see anything at all inside the<br/>17 driver's window, I expected the next thing to happen<br/>18 would be the window breaking as the driver fired out at<br/>19 me in a bid to escape. That is how convinced I was<br/>20 there were guns in that car."<br/>21 <b>A. Yes, that's correct.</b><br/>22 Q. Is that statement an accurate description of your<br/>23 mindset as you get out of your car and walk towards the<br/>24 Audi?<br/>25 <b>A. Yes, it is.</b></p> <p style="text-align: center;">Page 143</p>   | <p>1 Q. As you got out of the car and you walked towards the<br/>2 Audi, did you walk towards the driver's side?<br/>3 <b>A. Yes, that was my first point of danger, as in that was<br/>4 my first port of call.</b><br/>5 Q. Were you saying anything or shouting anything as you<br/>6 approached the car?<br/>7 <b>A. Yes, I was shouting that I was an armed police, as I was<br/>8 approaching the car.</b><br/>9 Q. When you reached the car, reached the driver's side of<br/>10 the car, what did you do?<br/>11 <b>A. So to put some context on what I did around the car,<br/>12 I will just come back to getting out of the vehicle, if<br/>13 I can.<br/>14 So as I have deployed from the vehicle, you<br/>15 obviously are assessing everything as we go, throughout<br/>16 the operation.<br/>17 So the NDM we apply to ourselves as well and you<br/>18 will be constantly applying that to your deployment,<br/>19 albeit subconsciously, so the information and<br/>20 intelligence is always coming in and that is a constant<br/>21 feed.<br/>22 And you are assessing your own threat and risk and,<br/>23 for want of a better word, you are developing your own<br/>24 working strategy in relation to how you then approach<br/>25 that vehicle, and this is what I was doing at the time.</b></p> <p style="text-align: center;">Page 144</p>   |

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| <p>1 So I have got out of the vehicle. I have then seen that<br/>2 the windows are still steamed up on the car. So I have<br/>3 taken all that information in, I am now looking at where<br/>4 my priorities are. So as we have said before, my<br/>5 priority is to get vision inside that car, and I haven't<br/>6 got that at the moment.</p> <p>7 As I approached the car, then my options are limited<br/>8 to get vision inside that car. But yes, I was shouting<br/>9 "armed police" as I approached and then I reached the<br/>10 car window -- do you want me to --</p> <p>11 Q. Before you move on, we heard from the driver of the car,<br/>12 we know it is Nathan Mason, yesterday, he said that as<br/>13 people were approaching the car he tried to wipe the<br/>14 window to wipe the condensation away, so he could see<br/>15 out or you could see in. Did you see whether or not<br/>16 that happened?</p> <p>17 A. No, I didn't see that happen.</p> <p>18 Q. Please continue, what happened when you reached the car?</p> <p>19 A. So given the fact there was no vision at all and I from<br/>20 what I remember I was one of the first ones to that car<br/>21 door, I then took the decision I needed to break the<br/>22 window to get vision inside, so I hadn't pre-planned<br/>23 doing that at all on the run up to it, because by virtue<br/>24 of the fact that the car windows would have steamed up,<br/>25 it could be, as we have in modern cars now, that the</p> <p style="text-align: center;">Page 145</p> | <p>1 windows become demisted pretty rapidly, so prior to<br/>2 getting out of the car it didn't cross my mind, sir, to<br/>3 pre-plan to break the window. For that fact I wanted to<br/>4 be in position to deal with any emerging threat and by<br/>5 that I mean both hands on my weapon as such.</p> <p>6 So it wasn't until I started closing down the<br/>7 driver's door that I made that decision.</p> <p>8 Q. Closing down, does that mean getting close to?</p> <p>9 A. Sorry, moving towards -- yes, moving towards the<br/>10 driver's door.</p> <p>11 I made that decision that I needed to try and smash<br/>12 that window in order to get vision inside immediately,<br/>13 because I was one of the first people there.</p> <p>14 Q. Before we move to how you tried to smash the window, is<br/>15 that something you regularly do in an extraction or<br/>16 similar, smash the window to see in or to otherwise gain<br/>17 access to a car?</p> <p>18 A. No, you wouldn't do that as a matter of course, there<br/>19 obviously has to be a reason why you would do that and<br/>20 for me at that time the reason was the window was<br/>21 completely steamed up and I had no vision at all inside.<br/>22 That coupled together with the fact that I was one of<br/>23 the first ones there, so at that moment in time I have<br/>24 no effective cover at all, because I can't see what is<br/>25 going on.</p> <p style="text-align: center;">Page 146</p> |
| <p>1 Q. Please tell us, how did you try to smash the window?<br/>2 Just so we are clear, was it the driver's side door<br/>3 window you were trying to smash?</p> <p>4 A. That's correct.</p> <p>5 Q. Not the windscreen?</p> <p>6 A. No, not the windscreen, no. The driver's side door, so<br/>7 because I have left the vehicle, I haven't got the<br/>8 approved device, as in a life hammer, to smash the<br/>9 window, so the only option I have got left is my police<br/>10 firearm.</p> <p>11 Now, for me, that becomes a spontaneous incident<br/>12 whereby I have made that decision spontaneously, rather<br/>13 than before I've got out of the car, so I am limited in<br/>14 my options. So my only option is to try, that then<br/>15 failed. I hit the driver's window once, that failed.<br/>16 From then on I realised very quickly that other<br/>17 colleagues are moving around the car and I think I have<br/>18 not recorded it in my statement I think someone was<br/>19 around the front of the car, it may have been S105<br/>20 around the front of the car.</p> <p>21 Q. Can I bring up a document that might help you.<br/>22 Can we have a look at INQ21. This might help you<br/>23 indicate a little bit of where people were.</p> <p>24 A. Yes, so clearly there, so I went to the driver's door as<br/>25 you can see there and S105 is at the front there.</p> <p style="text-align: center;">Page 147</p>  | <p>1 Q. We can see you the first person to reach the driver's<br/>2 side door?</p> <p>3 A. Yes, that's correct.</p> <p>4 Q. Behind you is W109 and then behind W109 is S105.</p> <p>5 A. Yes, I didn't know that at the time. I know that now<br/>6 from seeing this.</p> <p>7 So, yes, so now I am aware of other people around<br/>8 the car, who may or may not have vision inside the car,<br/>9 but my next priority is still -- it hadn't worked, so my<br/>10 next priority was to try the door.</p> <p>11 Q. Before you try the door, let's just round off with the<br/>12 window.</p> <p>13 You mentioned the approved device, we looked at the<br/>14 guidance this morning, so unless it would help you --<br/>15 I can bring it up if it will, I don't propose to bring<br/>16 it up -- is it right that the guidance is to use<br/>17 an approved device, a life hammer, to smash windows?</p> <p>18 A. Yes, it is.</p> <p>19 Q. You didn't have that on you?</p> <p>20 A. No, I didn't.</p> <p>21 Q. Is that something you would ordinarily carry with you,<br/>22 is it part of standard issue kit?</p> <p>23 A. It is and so if I can explain, it was on my ... in my<br/>24 possession as in in the car, so I had immediate access<br/>25 to it should I need it, but at the time of the</p> <p style="text-align: center;">Page 148</p>  |

1 **pre-deployment, as in before I got out of the car,**  
 2 **I hadn't made the decision to try and smash the window,**  
 3 **so I didn't take it with me.**  
 4 Q. You told us before that you knew before you got out of  
 5 the car that the windows were steamed up?  
 6 **A. Yes, that's correct, but also the fact that those**  
 7 **windows could be demisted almost immediately, they could**  
 8 **open the windows at any point. So for me I got out with**  
 9 **both hands on my weapon, rather than pre-planned to get**  
 10 **out to smash the window.**  
 11 THE CHAIRMAN: If you had taken it with you, would you have  
 12 used it?  
 13 **A. If I had had it with me, yes, sir.**  
 14 THE CHAIRMAN: Even though that would mean taking one hand  
 15 off your gun?  
 16 **A. Yes, sir, but then I would have pre-planned to do that,**  
 17 **so I would –**  
 18 THE CHAIRMAN: You have told us why you wouldn't take it  
 19 with you but you might just as easily have had it with  
 20 you, and in which case you would have used it because it  
 21 was the recognised way of smashing a window?  
 22 **A. Yes, sir. Yes, sir.**  
 23 THE CHAIRMAN: Thank you.  
 24 MS BLACKWELL: Finally, before we move on from this topic,  
 25 we saw this morning the College of Policing training

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1 So:  
 2 "I opened the driver's door with my left hand, all  
 3 the while keeping my gun pointing at the driver, I was  
 4 shouting at him that I was armed police and keep his  
 5 hands where I could see them. I saw that his hands were  
 6 on top of the steering wheel and they didn't move."  
 7 **A. That's correct, yes. I am trying to find it on here as**  
 8 **well.**  
 9 Q. Just for completeness, please, when you opened the door,  
 10 what was your position as regards the door? And were  
 11 you standing sort of behind the driver's seat, in front  
 12 of it, did you open it in front of you, if you follow my  
 13 question?  
 14 **A. Yes. And from memory, when I opened the driver's door,**  
 15 **I believe I was probably more or less level with the**  
 16 **driver's shoulder.**  
 17 Q. Once the door opened, you were standing between the open  
 18 door and the car?  
 19 **A. Yes, that's correct, yes.**  
 20 Q. Thank you.  
 21 You said all the while you kept your gun pointing at  
 22 the driver. Is it part of your training to ensure that  
 23 there is no risk that a subject can grab hold of the  
 24 gun?  
 25 **A. Yes, it is, so try and keep a reactionary gap in**

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1 indicates that the muzzle of a gun is not designed for  
 2 breaking windows and shouldn't be used to do so. Were  
 3 you aware of that at the time?  
 4 **A. Yes, so I am aware – again, during our training, it is**  
 5 **visited there, so if you do happen to do that in**  
 6 **a spontaneous situation, then clearly there is elements**  
 7 **of damage to the muzzle, damage to the sights of the**  
 8 **weapon and ultimately it could end up in**  
 9 **an unintentional discharge of the weapon as well.**  
 10 Q. Okay, so we get to the stage where you have tried to  
 11 break the driver's side window. It has not worked.  
 12 What did you do next?  
 13 **A. I have then tried the driver's door handle.**  
 14 Q. Tried to open it, was it locked?  
 15 **A. No, it opened straight away.**  
 16 Q. Can you please tell us what happened once the door  
 17 opened?  
 18 **A. So I have then opened the door, and I wasn't aware of my**  
 19 **colleagues' exact position at that time, so the door has**  
 20 **come open and I have seen the driver and I am shouting,**  
 21 **"Armed police, keep your hands where I can see them",**  
 22 **I would have to look at my statement to see the exact**  
 23 **words.**  
 24 Q. If you take a look at the bottom third of page 3:  
 25 "I was shouting at him ..."

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1 **relation to that and obviously keep control of our**  
 2 **weapon as well, as in both hands on the weapon, if at**  
 3 **all possible. But there are times when you may need to**  
 4 **drop one of your hands from that weapon.**  
 5 Q. When you open the door, and you can see the driver, who  
 6 we know to be Nathan Mason, you said your instruction  
 7 was, "Keep your hands where I can see them"?  
 8 **A. That's correct.**  
 9 Q. Was it your priority for his hands to be in a certain  
 10 position? Or for you to be able to see his hands?  
 11 **A. To be able to see his hands.**  
 12 Q. The fact that they were placed on the steering wheel as  
 13 opposed to in the air, was that significant to you? As  
 14 long as you could see them?  
 15 **A. As long as I could see them, yes.**  
 16 Q. What did you do once you saw him with his hands on the  
 17 wheel?  
 18 **A. So then the priority – again, as we keep speaking about**  
 19 **you are assessing everything around you as best you can**  
 20 **and the ongoing risk to yourself and your colleagues, so**  
 21 **I was now aware that as I see now, S105 was in fact**  
 22 **round towards the front of the car, but we essentially**  
 23 **had the driver still in the car, so my next priority was**  
 24 **to extract him from that position, so we reduced the**  
 25 **risk of that vehicle being used as any form of weapon or**

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|--|---|
| <p>1 <b>indeed to try and escape.</b></p> <p>2 Q. What did you do then?</p> <p>3 <b>A. I grabbed him by the shoulder and then dragged him out</b></p> <p>4 <b>of the car, with one hand.</b></p> <p>5 Q. Again, we looked at the training for how you perform</p> <p>6 extraction this morning, so I am not necessarily going</p> <p>7 to bring it up, but if it would help you I will. Did</p> <p>8 you keep one hand on your gun --</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. -- and one hand on the subject, which we know to be</p> <p>11 Nathan Mason, and drag him out?</p> <p>12 <b>A. Yes, so ideally, you would have a cover officer and</b></p> <p>13 <b>extraction officer, but there are times, again, which is</b></p> <p>14 <b>recognised within the manual whereby an officer may have</b></p> <p>15 <b>to perform a dual role.</b></p> <p>16 <b>And my reasoning for doing that, that day, was the</b></p> <p>17 <b>fact that we had -- he was in the driver's seat, I was</b></p> <p>18 <b>not aware where maybe W109 and S105 exactly were, but</b></p> <p>19 <b>I certainly remember -- again, not only going off the</b></p> <p>20 <b>diagram now, S105 was towards the front of the vehicle,</b></p> <p>21 <b>so then for me that the risk of that car moving</b></p> <p>22 <b>increases, sorry, the risk of injury to S105. So my</b></p> <p>23 <b>priority was then to get the driver out of the car and</b></p> <p>24 <b>the only option that I had then was to perform that dual</b></p> <p>25 <b>role, to drop one hand from my weapon and take hold of</b></p> <p style="text-align: center;">Page 153</p> | <p>1 <b>the driver and drag him out of the car as best I could</b></p> <p>2 <b>to negate that risk.</b></p> <p>3 Q. You said that ideally you would have a cover officer,</p> <p>4 can you just explain to us how it would work, what would</p> <p>5 a cover officer be doing and how would that change how</p> <p>6 you performed an extraction?</p> <p>7 <b>A. So if you have an ideal scenario whereby let's say W109</b></p> <p>8 <b>was in the perfect position to be covering inside to the</b></p> <p>9 <b>driver, through the A-frame of the car as we call it,</b></p> <p>10 <b>and I could see that and it was confirmed, then there</b></p> <p>11 <b>would be clear, even if it was non-verbal communication</b></p> <p>12 <b>between us two, that that is the roles we were taking.</b></p> <p>13 <b>I would then be happy and in a position then to</b></p> <p>14 <b>essentially drop firearms cover and then get in</b></p> <p>15 <b>a position to conventionally extract the driver.</b></p> <p>16 Q. By drop firearms cover, do you mean stow your own</p> <p>17 weapon?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Confident that they have still got their weapon pointed</p> <p>20 at the subject?</p> <p>21 <b>A. Yes, that's correct.</b></p> <p>22 Q. You said because you didn't have a cover officer, or</p> <p>23 couldn't see clearly whether you had one, you performed</p> <p>24 a dual role. Does that mean you tried to keep firearms</p> <p>25 cover on the subject, whilst dragging him out at the</p> <p style="text-align: center;">Page 154</p> |
| <p>1 same time?</p> <p>2 <b>A. Yes, that's correct.</b></p> <p>3 Q. Once you dragged the driver, who we know to be</p> <p>4 Nathan Mason out of the car, what did you do with him?</p> <p>5 <b>A. He was out on to get down, and again I have to look at</b></p> <p>6 <b>the wording.</b></p> <p>7 Q. Bottom of page 3, you indicate:</p> <p>8 "I dragged him out onto the floor, I was shouting at</p> <p>9 him to get down, I was still pointing my firearm at him</p> <p>10 and I was aware other officers were starting to join</p> <p>11 me."</p> <p>12 Could you see his hands throughout that extraction?</p> <p>13 <b>A. I can't say for sure, I couldn't recall it at the time.</b></p> <p>14 <b>I don't know, is the honest answer.</b></p> <p>15 Q. That is fine. You said:</p> <p>16 "I am not sure how, but between us a set of soft</p> <p>17 rope-like handcuffs were applied to the male."</p> <p>18 <b>A. Yes, that's correct.</b></p> <p>19 Q. We heard some evidence from Mr Mason in relation to</p> <p>20 there being a use of force as against him, that he was</p> <p>21 struck to the face and to the body whilst he was being</p> <p>22 removed from the car and whilst he was on the floor.</p> <p>23 Can you explain to us what force you used, if any,</p> <p>24 in relation to Mr Mason?</p> <p>25 <b>A. So the force that I used was actually the physical act</b></p> <p style="text-align: center;">Page 155</p>   | <p>1 <b>of dragging him out on to the floor and possibly holding</b></p> <p>2 <b>him down at that point, but also with my firearm as</b></p> <p>3 <b>well, covering him from my firearm, unconventionally as</b></p> <p>4 <b>we now know and that was the extent of it.</b></p> <p>5 <b>Mr Coates, can we look at MPS14, page 2. Thank you</b></p> <p>6 <b>very much.</b></p> <p>7 <b>Looking at the fourth paragraph:</b></p> <p>8 <b>"I was put on the floor and they put string-type</b></p> <p>9 <b>handcuffs on me. I next remember being kicked in the</b></p> <p>10 <b>right side of my ribs by an officer wearing ... boots,</b></p> <p>11 <b>who I believe was male ... the officers were saying</b></p> <p>12 <b>don't look at me and give me another kick. A female</b></p> <p>13 <b>offer then struck me to the left side of my cheekbone,</b></p> <p>14 <b>I think this was with her gun, this caused reddening and</b></p> <p>15 <b>bruising."</b></p> <p>16 <b>Did you deliver any of those strikes to Mr Mason or</b></p> <p>17 <b>did you see them?</b></p> <p>18 <b>A. No.</b></p> <p>19 Q. Thank you.</p> <p>20 Thank you, Mr Coates, we can take that down.</p> <p>21 At the bottom of page 3 of your statement you said</p> <p>22 you heard a loud bang during all of this?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. At the time, what did you believe that bang to be?</p> <p>25 <b>A. Again, immediately I was not sure where it had come</b></p> <p style="text-align: center;">Page 156</p>   |

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|---|---|
| <p>1 <b>from, it was -- obviously there had been a discharge of</b><br/> 2 <b>some form, whether that be from a Hatton gun or a tyre</b><br/> 3 <b>deflation or a firearm, again I wasn't sure at the time,</b><br/> 4 <b>because it was just a bang.</b><br/> 5 Q. Did you then hear a shout of medic or med pack?<br/> 6 <b>A. Yes, that's correct.</b><br/> 7 Q. Where did you go once you heard medic or med pack?<br/> 8 <b>A. So straight away I looked down at the driver, and in</b><br/> 9 <b>conjunction with W109 saw he was secure, or secure</b><br/> 10 <b>enough, so to ascertain or try to find out what</b><br/> 11 <b>assistance was needed I ran to the rear of my Charlie</b><br/> 12 <b>vehicle and grabbed the med pack, because at that point</b><br/> 13 <b>I wasn't sure what was going on or who needed it.</b><br/> 14 Q. Did you then check Nathan Mason for injuries to himself?<br/> 15 <b>A. Yes, with W109, yes.</b><br/> 16 Q. Can you tell us how you checked Mr Mason for his<br/> 17 injuries?<br/> 18 <b>A. I asked him if he was injured at all and if so where, he</b><br/> 19 <b>said he wasn't sure, or words to that effect, so between</b><br/> 20 <b>myself and W109 we then took the decision to cut his</b><br/> 21 <b>clothes off to assess him, to see if he was in fact</b><br/> 22 <b>injured.</b><br/> 23 Q. Were you involved in any way in giving first aid to<br/> 24 Jermaine Baker?<br/> 25 <b>A. No.</b></p> <p style="text-align: center;">Page 157</p> | <p>1 Q. Did you see the first aid being delivered by others?<br/> 2 <b>A. No.</b><br/> 3 MS MCNEILL: Sir, that concludes my questions.<br/> 4 I will just check if there are questions from<br/> 5 others.<br/> 6 Do you have any questions for this witness?<br/> 7 Questions from THE CHAIRMAN<br/> 8 THE CHAIRMAN: Yes, I would like to go back to the time when<br/> 9 you arrive at the scene and you got out of the vehicle.<br/> 10 <b>A. Yes, sir.</b><br/> 11 THE CHAIRMAN: You were the front-seat passenger?<br/> 12 <b>A. Yes.</b><br/> 13 THE CHAIRMAN: And you had a Taser gun?<br/> 14 <b>A. Yes, sir.</b><br/> 15 THE CHAIRMAN: And you had it with you?<br/> 16 <b>A. Yes.</b><br/> 17 THE CHAIRMAN: Did anybody else in your vehicle have<br/> 18 a Taser?<br/> 19 <b>A. I don't know, sir, is the honest answer to that.</b><br/> 20 <b>I would expect the driver to have one, but I don't know.</b><br/> 21 THE CHAIRMAN: It wouldn't be a case of one Taser per<br/> 22 vehicle?<br/> 23 <b>A. That is the generic format that we use, but then if I am</b><br/> 24 <b>in certain roles, personally, I would take a Taser,</b><br/> 25 <b>depending on what my role is.</b></p> <p style="text-align: center;">Page 158</p>  |
| <p>1 THE CHAIRMAN: If there were only one, would it be the case<br/> 2 that the driver would have it on his side or would there<br/> 3 be no particular fixed place for it?<br/> 4 <b>A. Generally it would be that the driver would have it, by</b><br/> 5 <b>virtue of the fact that on any enforced stop, any sort</b><br/> 6 <b>of firearms deployment from a vehicle, the driver -- if</b><br/> 7 <b>we were deploying from a vehicle platform, they would be</b><br/> 8 <b>the last ones out.</b><br/> 9 THE CHAIRMAN: Is it the case that because you had one, you<br/> 10 are assuming that the driver had one as well because if<br/> 11 there was only going to be one, it would be the<br/> 12 driver's?<br/> 13 <b>A. Yes. Yes, sir.</b><br/> 14 THE CHAIRMAN: We heard this morning that when a window is<br/> 15 smashed that doesn't create immediate visibility,<br/> 16 because there are all sorts -- we all know what happens<br/> 17 when windows get smashed. For a moment, until the glass<br/> 18 has been cleared, it makes matters worse --<br/> 19 <b>A. Quite possibly, sir, yes.</b><br/> 20 THE CHAIRMAN: -- and that is known by everybody who has to<br/> 21 deploy in this way.<br/> 22 Was there a reason why you didn't try the door<br/> 23 first?<br/> 24 <b>A. Yes, sir, because again approaching the vehicle, we were</b><br/> 25 <b>obstructed -- I have got an obstructed view as it was</b></p> <p style="text-align: center;">Page 159</p>                             | <p>1 <b>steamed up, so for me to then try the door first, again</b><br/> 2 <b>if it was locked on purpose or whether it be locked as</b><br/> 3 <b>a result of ... like modern cars, when they</b><br/> 4 <b>automatically lock. That is another even second whereby</b><br/> 5 <b>I have given the occupants more time to then possibly</b><br/> 6 <b>prepare themselves for escape or to use firearms against</b><br/> 7 <b>us.</b><br/> 8 <b>So --</b><br/> 9 THE CHAIRMAN: You decided that the quickest way of<br/> 10 effectively distracting them and disturbing them was to<br/> 11 smash the window --<br/> 12 <b>A. Yes, sir.</b><br/> 13 THE CHAIRMAN: -- if you could?<br/> 14 <b>A. Yes, sir.</b><br/> 15 MS MCNEILL: Just two further matters arising, if we can.<br/> 16 THE CHAIRMAN: Yes.<br/> 17 Further questions from MS MCNEILL<br/> 18 MS MCNEILL: The first, if you turn to tab 4 in your bundle<br/> 19 and the final page of that statement, I understand that<br/> 20 you were from a different team to some of the officers<br/> 21 involved on that day, but is it right that you knew the<br/> 22 individual we call W80?<br/> 23 <b>A. Yes.</b><br/> 24 MS MCNEILL: Had he been part of your training as a CT/SFO?<br/> 25 <b>A. As an ARV officer, so prior to that.</b></p> <p style="text-align: center;">Page 160</p> |



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| <p>1 Q. Sorry. Can you describe --</p> <p>2 THE CHAIRMAN: Armed response vehicle?</p> <p>3 <b>A. Yes, sir.</b></p> <p>4 THE CHAIRMAN: I am learning, thank you.</p> <p>5 MS MCNEILL: He taught you, is it right, on both your</p> <p>6 initial ARV course and on a subsequent building search</p> <p>7 course?</p> <p>8 <b>A. Yes, that's correct.</b></p> <p>9 Q. Is it right that you hold him in high regard and</p> <p>10 consider him as a friend?</p> <p>11 <b>A. As what, sorry?</b></p> <p>12 Q. As a friend.</p> <p>13 <b>A. Yes.</b></p> <p>14 Q. Did you have any significant contact with him on the day</p> <p>15 of 11 December?</p> <p>16 <b>A. No, only by means of the briefing.</b></p> <p>17 Q. Were you able to notice whether there was anything out</p> <p>18 of the ordinary in relation to his demeanour on that day</p> <p>19 or was it as normal?</p> <p>20 <b>A. When I spoke to him and during the briefing, no, not at</b></p> <p>21 <b>all.</b></p> <p>22 Q. One final just very minor matter, if I can. Can we</p> <p>23 bring back up, Mr Coates, please, INQ21.</p> <p>24 Understanding that you were at the driver's side of</p> <p>25 the car, there was no car parked at that side?</p> <p style="text-align: center;">Page 161</p> | <p>1 <b>A. No.</b></p> <p>2 Q. Were you able to open the driver's door the whole way</p> <p>3 open?</p> <p>4 <b>A. I was able to, whether I actually managed it or not,</b></p> <p>5 <b>I don't know, but, yes, you could open the whole way.</b></p> <p>6 Q. In terms of training for extractions, do you receive any</p> <p>7 training on performing extractions from vehicles in</p> <p>8 a more confined space, so in a parking space for</p> <p>9 example?</p> <p>10 <b>A. Yes, so we do that in training quite a lot and it could</b></p> <p>11 <b>what we call an offside option, the terminology there,</b></p> <p>12 <b>whereby the car may be parked against railings. So it</b></p> <p>13 <b>is something that we do practise and train for.</b></p> <p>14 Q. In terms of carrying out an extraction, is it</p> <p>15 an out-of-the-ordinary circumstances to have to perform</p> <p>16 an extraction on a vehicle in a more confined space or</p> <p>17 a parking space?</p> <p>18 <b>A. I would not say more out of the ordinary, more --</b></p> <p>19 <b>probably, especially because of the environment we work</b></p> <p>20 <b>in in London, it is probably expected in certain</b></p> <p>21 <b>aspects.</b></p> <p>22 MS MCNEILL: Thank you.</p> <p>23 Sir, do you have any questions arising from that?</p> <p>24 THE CHAIRMAN: No, thank you.</p> <p>25 MS MCNEILL: That concludes the questioning for this</p> <p style="text-align: center;">Page 162</p>                   |
| <p>1 witness, can he be released?</p> <p>2 THE CHAIRMAN: Shall we have an afternoon break?</p> <p>3 MS MCNEILL: I think it is perfect timing, sir.</p> <p>4 THE CHAIRMAN: Very good. We will start again at 2.50.</p> <p>5 (2.37 pm)</p> <p>6 (A short adjournment)</p> <p>7 (2.51 pm)</p> <p>8 MS MCNEILL: Sir, our final witness is known by the cipher</p> <p>9 W109.</p> <p>10 THE CHAIRMAN: Thank you.</p> <p>11 MS MCNEILL: Can the witness please be sworn?</p> <p>12 THE CHAIRMAN: She may.</p> <p>13 W109 (sworn)</p> <p>14 Questions from MS MCNEILL</p> <p>15 MS MCNEILL: Good afternoon, officer, can I confirm that you</p> <p>16 are currently a detective sergeant in the</p> <p>17 Metropolitan Police?</p> <p>18 <b>A. No, I think that is a typo, I am just a police</b></p> <p>19 <b>constable.</b></p> <p>20 Q. I am sorry.</p> <p>21 Can I confirm you are a police constable in the</p> <p>22 Metropolitan Police?</p> <p>23 <b>A. Yes, I will take the promotion.</b></p> <p>24 Q. Perhaps.</p> <p>25 Can you confirm you are known by the cipher W109?</p> <p style="text-align: center;">Page 163</p>  | <p>1 <b>A. Yes.</b></p> <p>2 Q. In 2015, were you an SFO in SCO19?</p> <p>3 <b>A. Yes.</b></p> <p>4 Q. Can you please summarise for us briefly your experience</p> <p>5 in the police force as of December 2015, including in</p> <p>6 particular when you qualified as an authorised firearms</p> <p>7 officer?</p> <p>8 <b>A. Yes, so by that point I had had nearly 12 years in the</b></p> <p>9 <b>police service, I had transferred in from Thames Valley,</b></p> <p>10 <b>the year before, and I had had five years as a CTSFO at</b></p> <p>11 <b>that point.</b></p> <p>12 Q. In December 2015, can you please tell us when you first</p> <p>13 became aware of the operation we know as Operation</p> <p>14 Ankaa?</p> <p>15 <b>A. I had been -- I couldn't say exactly what day I was</b></p> <p>16 <b>told, but it would have been last minute because I was</b></p> <p>17 <b>covering some late turns as part of -- along with my</b></p> <p>18 <b>team at that point, and I was going to -- due to staff</b></p> <p>19 <b>up an additional team for that operation itself. So we</b></p> <p>20 <b>would have been told last minute.</b></p> <p>21 Q. We were told by the witness we have just had, V68, that</p> <p>22 he was working late shifts that week but was asked to</p> <p>23 come along to assist to provide extra support, does the</p> <p>24 same apply to you?</p> <p>25 <b>A. Yes, he was on my team at that point.</b></p> <p style="text-align: center;">Page 164</p> |

1 Q. Were you working on the day of 10 December 2015?  
 2 **A. Yes.**  
 3 Q. Were you on a late shift that day?  
 4 **A. Yes.**  
 5 Q. As with V68, were you in fact called out at all on that  
 6 afternoon?  
 7 **A. No, we weren't.**  
 8 Q. Were you able to go to a hotel to rest for the remainder  
 9 of your shift?  
 10 **A. So I can't recall actually being at the hotel, just for**  
 11 **how long ago it was and I haven't put it down in my**  
 12 **statement, but as a team we would normally function**  
 13 **together so I can only presume yes, I would have been or**  
 14 **I would have been given a rest period, without a doubt.**  
 15 Q. Again, that is probably the more significant point. As  
 16 you were not called out on the afternoon of 10 December,  
 17 did you have the opportunity to rest sufficiently before  
 18 your deployment early in the morning on the 11th?  
 19 **A. Yes.**  
 20 Q. Were you invited to go to a briefing on 10 December in  
 21 relation to this operation?  
 22 **A. No, not on the 10th.**  
 23 Q. Was your first briefing on the morning of the  
 24 11 December, when you joined the operation?  
 25 **A. Yes.**

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1 Q. We have heard from others, is it common that your first  
 2 briefing in relation to an operation will be on the day  
 3 of that operation?  
 4 **A. Yes, if you are not part of the planning team, then it**  
 5 **is, yes, it is common practice that you turn up on the**  
 6 **day and receive your crewings on the job then.**  
 7 Q. However, if there was a briefing available on the day  
 8 before, at which there would be individuals from the  
 9 various moving parts in a large operation, is that  
 10 a briefing that you would have found it helpful to  
 11 attend, if you had been able to?  
 12 **A. Not necessarily. You sort of -- you turn up as, again,**  
 13 **I was backfilling and staffing up that additional team,**  
 14 **so you would just want to turn up and know your role for**  
 15 **the particular day, if I am honest.**  
 16 THE CHAIRMAN: Would you go -- no doubt you would be honest,  
 17 but would you go to such a briefing if you knew that the  
 18 TFC wanted as many CTSFOs as possible to attend?  
 19 **A. Yeah, absolutely if the TFC was asking for us, but it is**  
 20 **just normally operational reasons and we are covering --**  
 21 **we were a different team, so it might not always be**  
 22 **practicable.**  
 23 THE CHAIRMAN: I appreciate that, but on this occasion the  
 24 practicality of it doesn't seem to have prevented people  
 25 from attending it. What seems to have prevented people

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1 from attending it was the fact that they were never  
 2 invited in the first place.  
 3 **A. Yes, I was not aware of it, yes.**  
 4 THE CHAIRMAN: Thank you.  
 5 MS MCNEILL: We just heard from V68 about the Charlie Car.  
 6 Is it right that you were in fact the rear passenger of  
 7 the Charlie Car?  
 8 **A. Yes.**  
 9 Q. Together with V68 and an individual, Mr Ronan O'Conner,  
 10 previously known as K78?  
 11 **A. Yes.**  
 12 MS MCNEILL: Sir, Mr O'Conner will come tomorrow.  
 13 THE CHAIRMAN: Yes.  
 14 MS MCNEILL: We heard from V68 that in relation to  
 15 essentially who sits where, once you are assigned to  
 16 a car, you have a conversation amongst yourselves and  
 17 you just decide who is going to be the driver, who is  
 18 going to be the passenger. Is that right?  
 19 **A. Yes, it is.**  
 20 Q. As the rear passenger of the Charlie Car, did you have  
 21 any specific responsibilities in that role?  
 22 **A. Yes, so as the rear seat, you are normally an additional**  
 23 **map reader, so you can monitor the maps on there,**  
 24 **because radio is normally done from the front. Also**  
 25 **depending on the car itself, as in which vehicle you are**

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1 **in, you may be responsible for having the shotgun to**  
 2 **deflate any tyres if needs be, for a vehicle breaking**  
 3 **out. So that was my responsibility.**  
 4 Q. Thank you.  
 5 We are going to talk about both of those specific  
 6 aspects in just a moment.  
 7 **A. Yes.**  
 8 Q. Did you attend the 3.00 am briefing at Lemna Street?  
 9 **A. Yes, I did.**  
 10 Q. Then did you attend the 5.00 am briefing that was  
 11 delivered at Lincoln Road?  
 12 **A. Yes.**  
 13 Q. It might help you in relation to your statement, I am  
 14 looking at tab 3 of the bundle.  
 15 Sir, it's the same, hopefully, in yours, which has  
 16 the most detailed account.  
 17 **A. Yes.**  
 18 Q. Starting at the bottom of page 1, in relation to the  
 19 briefings you say:  
 20 "I was told there were two prisoners travelling to  
 21 Wood Green Crown Court that morning to be sentenced in  
 22 relation to drug and firearm offences and that they had  
 23 been stopped with an automatic weapon with the safety  
 24 catch off ready to go. I was also made aware that the  
 25 male who had supplied the males previously with the

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42 (Pages 165 to 168)

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| <p>1 automatic weapons was believed to be supplying for this</p> <p>2 job. I was also aware that it was a Turkish gang who</p> <p>3 were behind the plot to free the prisoners and the gang</p> <p>4 were extremely dangerous."</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Does that represent the main points that you took away</p> <p>7 from the briefing?</p> <p>8 <b>A. Yes, definitely.</b></p> <p>9 Q. Because we have transcripts we know the briefing was</p> <p>10 a little bit lengthier than that, but were those the</p> <p>11 parts you found to be the most point?</p> <p>12 <b>A. Yes, they are poignant parts I have taken from that,</b></p> <p>13 <b>which has formed my threat assessment, yes.</b></p> <p>14 Q. You anticipate my next question: based on that</p> <p>15 information as it was available to you, what was your</p> <p>16 threat assessment at the beginning of the day?</p> <p>17 <b>A. So on the basis of that intelligence, and my background</b></p> <p>18 <b>knowledge in relation to the Turkish gang, it was high.</b></p> <p>19 <b>In and around the fact of the weaponry that potentially</b></p> <p>20 <b>was going to be available to them, automatic firearms,</b></p> <p>21 <b>which have obviously a devastating effect, and heightens</b></p> <p>22 <b>the threat immediately and also with the personnel we</b></p> <p>23 <b>are dealing with as well and their previous history.</b></p> <p>24 <b>It, again, just heightened the threat for me.</b></p> <p>25 Q. Were you aware of or did you have experience of this</p> <p style="text-align: center;">Page 169</p> | <p>1 particular Turkish gang?</p> <p>2 <b>A. So knowing officers that worked within the Tottenham</b></p> <p>3 <b>area/Wood Green area, it was, yes, I was aware of that</b></p> <p>4 <b>and also some of my colleagues had dealt with them for</b></p> <p>5 <b>various incidents and yes, they kind of always went</b></p> <p>6 <b>through with their threats, the weapons were always</b></p> <p>7 <b>real --</b></p> <p>8 Q. You were aware of them by reputation?</p> <p>9 <b>A. Yes, absolutely.</b></p> <p>10 Q. Was that an important factor in your risk/threat</p> <p>11 assessment?</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. Was another important factor in your threat assessment</p> <p>14 the availability of weapons?</p> <p>15 <b>A. Yeah, absolutely.</b></p> <p>16 <b>It married it all up.</b></p> <p>17 Q. What was your understanding at the conclusion of</p> <p>18 briefings as to whether or not weapons, firearms</p> <p>19 I should say, would be used on this occasion?</p> <p>20 <b>A. Due to the intelligence, I believed that, yes, they were</b></p> <p>21 <b>going to have access to automatic firearms potentially,</b></p> <p>22 <b>if they had sourced it from the same dealer.</b></p> <p>23 Q. Okay, and was it your understanding then, did you</p> <p>24 interpret it to mean that they had access from that</p> <p>25 dealer, at that time?</p> <p style="text-align: center;">Page 170</p>   |
| <p>1 <b>A. That was -- yeah, that was my interpretation.</b></p> <p>2 Q. Again, just to be specific, was it your understanding</p> <p>3 that they had access to a real firearm?</p> <p>4 <b>A. Yeah, I believed they would have been real.</b></p> <p>5 Q. Thank you.</p> <p>6 Following the briefings, did you collect your</p> <p>7 equipment for the purposes of your deployment?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Did you have an iPad?</p> <p>10 <b>A. Yes, I did.</b></p> <p>11 Q. You had your MCX carbine, is that your primary weapon?</p> <p>12 <b>A. That's primary, yes.</b></p> <p>13 Q. You had a baton launcher?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Can you tell us a little bit about what the baton</p> <p>16 launcher's purpose is? I know it sounds quite</p> <p>17 self-explanatory, but how you use the baton launcher?</p> <p>18 <b>A. Yes, it's fine, it is a less-lethal option to couple</b></p> <p>19 <b>along with the Taser. Personally, I find it not as</b></p> <p>20 <b>effective, just because it is quite cumbersome, it's</b></p> <p>21 <b>a big item to carry around. However, it provides us</b></p> <p>22 <b>with a greater distance in relation to the deployment</b></p> <p>23 <b>range, you can fire it up to 25 metres, which is further</b></p> <p>24 <b>than the Taser. It also delivers an AEP, which is</b></p> <p>25 <b>a solid sort of rubber bullet, so hence why it is the</b></p> <p style="text-align: center;">Page 171</p>   | <p>1 <b>less-lethal option. You have -- also we are trained in</b></p> <p>2 <b>a different -- so you aim for the belt buckle area, so</b></p> <p>3 <b>again, there are a lot of factors to deal with,</b></p> <p>4 <b>utilising and using the baton launcher itself, that you</b></p> <p>5 <b>have to sort of consider.</b></p> <p>6 Q. You deployed with a baton launcher that morning. Does</p> <p>7 that mean you took one with you when you got into the</p> <p>8 car?</p> <p>9 <b>A. Yes, so I would have taken one into the car and then it</b></p> <p>10 <b>is my own self-assessment as to which weaponry I then</b></p> <p>11 <b>get out of the vehicle with, depending on the threat and</b></p> <p>12 <b>risk posed at the time.</b></p> <p>13 Q. When we reach that point in time I will ask you to</p> <p>14 explain for us whether you did or did not take that one</p> <p>15 with you.</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Were you carrying a Glock?</p> <p>18 <b>A. Yes, Glock 17.</b></p> <p>19 Q. What was the purpose of that weapon?</p> <p>20 <b>A. So that will be my back-up weapon, so should I have</b></p> <p>21 <b>a fault or a stoppage in any shape or form with my</b></p> <p>22 <b>primary weapon, that is my -- the drill is then to go to</b></p> <p>23 <b>your secondary weapon, your back-up weapon, which was</b></p> <p>24 <b>the Glock.</b></p> <p>25 Q. Finally, you had the Benelli shotgun, I think you said</p> <p style="text-align: center;">Page 172</p> |

1 that was because you were sitting as the rear-seat  
 2 passenger?  
 3 **A. That's right, rear-seat passenger of Charlie which may**  
 4 **or may not be relevant in relation to where the car ends**  
 5 **up, whether you have to deploy then with that to use**  
 6 **a Hatton round, which is a specialist round within the**  
 7 **actual shotgun itself, which you can then utilise to**  
 8 **deflate the tyres on a vehicle and immobilise it.**  
 9 Q. Is that in the same category as the baton launcher, that  
 10 it is something you deploy with, you take it into the  
 11 car with you, but then you decide whether or not to take  
 12 it once you get out of the car to any intervention or  
 13 interception?  
 14 **A. Absolutely, yes.**  
 15 **Yes, you would struggle to carry it all.**  
 16 THE CHAIRMAN: What does the baton launcher do?  
 17 **A. So it will fire a solid rubber bullet which, like**  
 18 **I said, the point of aim that we are trained in is the**  
 19 **belt buckle and basically it is in theory to wind**  
 20 **someone at a huge velocity, so a less-lethal option.**  
 21 THE CHAIRMAN: Thank you.  
 22 MS MCNEILL: After you had collected all of your equipment,  
 23 did you move towards Quicksilver base?  
 24 **A. Yes.**  
 25 Q. Just so you know, I am looking at page 2 of your

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1 Q. I am going to assist you. In the second large paragraph  
 2 at page 2, you say:  
 3 "I was also aware that the prison van was being  
 4 followed covertly by other armed officers should  
 5 a breakout occur involving another unknown vehicle."  
 6 So it was a possibility, but at that time you were  
 7 not aware of whether or not there was a second vehicle?  
 8 **A. No, not that I can recall, but that would have been**  
 9 **a contingency we would have considered anyway.**  
 10 Q. Then you received information over the radio that the  
 11 car had parked in Bracknell Close; is that correct?  
 12 **A. Yes.**  
 13 Q. How much information were you given and were you able to  
 14 glean about Bracknell Close and the position of the  
 15 vehicle?  
 16 **A. So I remember hearing from the surveillance commentary**  
 17 **they described it quite well and I was aware that it was**  
 18 **facing outwards, that it was parked in a residential**  
 19 **parking bay and I was also aware that there was**  
 20 **potentially some builders within the vicinity in the**  
 21 **area. And it was also directly behind the court,**  
 22 **Bracknell Close, itself.**  
 23 Q. Was that information you gleaned from the radio or also  
 24 from looking at your map on your iPad?  
 25 **A. Yes, I would have definitely gleaned it from the**

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1 statement, if that helps.  
 2 **A. Yes.**  
 3 Q. Whilst you were sitting at Quicksilver Patrol Base, what  
 4 was your role at that time?  
 5 **A. So I was in the rear seat still of Charlie vehicle, and**  
 6 **I was utilising the iPad to monitor exactly from the**  
 7 **surveillance commentary where potentially the suspect**  
 8 **vehicle would be.**  
 9 Q. Pausing there, we heard from some others who were  
 10 monitoring maps, that they had maps, little sticky tabs  
 11 that they were moving around. You were using an iPad.  
 12 Was that your own iPad or a police issue?  
 13 **A. No, police issue.**  
 14 Q. You were using the maps based on the information coming  
 15 over the radio to work out where the mission vehicle we  
 16 call it, where the Serco van is?  
 17 **A. Yes.**  
 18 Q. Did you receive any information over the radio about the  
 19 number of occupants inside the mission vehicle, the  
 20 Audi?  
 21 **A. Yes, I was aware there was four potentially within the**  
 22 **vehicle.**  
 23 Q. Did you receive any information about whether or not  
 24 there was a second vehicle involved in this plan?  
 25 **A. I can't recall.**

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1 **information coming across on the radios and then married**  
 2 **it up again with the mapping system.**  
 3 **I also looked at Street View, just so I could sort**  
 4 **of have a look and walk myself through it.**  
 5 Q. Using Street View on your iPad, were you able to look at  
 6 a picture of what Bracknell Close would look like?  
 7 **A. Yes, hopefully, yeah. The last time Google took**  
 8 **an image, that is what I would have been looking at.**  
 9 Q. Can you remember, did you look at that?  
 10 **A. Yes.**  
 11 Q. Were you able to tell for example where the parking  
 12 spaces were as relates to residents, other roads, for  
 13 example, other car park spaces, the like?  
 14 **A. Yes.**  
 15 Q. Did you share that information with the others in the  
 16 car with you?  
 17 **A. I did, yes, just because of the picture paints**  
 18 **a thousand words and it helps.**  
 19 Q. At that stage, at Quicksilver, whilst you are waiting  
 20 for information from Bracknell Close, did you have  
 21 an expectation as to what would be the likely tactic  
 22 deployed at the time of any interception or  
 23 intervention, once state amber was declared?  
 24 **A. Yes, an enforced stop with extraction.**  
 25 Q. Why did you believe that was the likely tactic on that

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| <p>1 day?</p> <p>2 <b>A. Due to the heightened threat and being we would need to</b></p> <p>3 <b>be in a position to close down that vehicle quickly,</b></p> <p>4 <b>there wouldn't be a sterile area to perform</b></p> <p>5 <b>an additional tactic. So therefore we would need to</b></p> <p>6 <b>move in and close down that threat to protect the</b></p> <p>7 <b>subjects and ourselves at that point.</b></p> <p>8 Q. At what stage did you first understand that an armed</p> <p>9 extraction was the likely outcome, was it whilst you</p> <p>10 were waiting at Quicksilver and you knew the car had</p> <p>11 settled in Bracknell Close or was it at a point earlier</p> <p>12 in the day?</p> <p>13 <b>A. I would have said a point earlier in the day from the</b></p> <p>14 <b>briefing and the intelligence that we -- we had heard,</b></p> <p>15 <b>and then throughout the day, we would self assess the</b></p> <p>16 <b>intelligence and information we receive, location of</b></p> <p>17 <b>vehicle. So it had not changed at that point at all.</b></p> <p>18 Q. Taking then the two stages, if I may.</p> <p>19 At the first stage, earlier in the day when you</p> <p>20 first thought the likely outcome was an armed</p> <p>21 extraction, you didn't know at that stage where the</p> <p>22 vehicle would come to rest --</p> <p>23 <b>A. No.</b></p> <p>24 Q. -- so you didn't know where any intervention or</p> <p>25 interception would occur?</p> <p style="text-align: center;">Page 177</p> | <p>1 <b>A. No.</b></p> <p>2 Q. Why, without that information, were you of the view that</p> <p>3 an armed extraction was the likely outcome?</p> <p>4 <b>A. Because of the nature of the incident, the weaponry that</b></p> <p>5 <b>was going to be used, the fact that they would be within</b></p> <p>6 <b>a soft skin, so to speak, vehicle.</b></p> <p>7 Q. What does a "soft-skin vehicle" mean?</p> <p>8 <b>A. So, it is not armoured, so therefore especially a round</b></p> <p>9 <b>of that calibre, firing out of an automatic firearm,</b></p> <p>10 <b>that would just come straight out of the vehicle. We</b></p> <p>11 <b>are equally in soft-skin vehicles, so the same risk is</b></p> <p>12 <b>to us as well.</b></p> <p>13 Q. You said a round of that calibre, are you referring to</p> <p>14 the weapons that the individuals Izzet Eren had been</p> <p>15 arrested in possession of?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Was it your expectation or understanding that weaponry</p> <p>18 of the same calibre -- I'm probably using incorrect</p> <p>19 terminology -- would be used on this occasion?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Just one quick point of detail, before I move past it,</p> <p>22 at page 2 on your statement, you say:</p> <p>23 "Information was received over the radio that the</p> <p>24 black Audi had parked within Bracknell Close, which was</p> <p>25 directly behind the court, and a male with grey jogging</p> <p style="text-align: center;">Page 178</p> |
| <p>1 bottoms had got out of vehicle and walked down towards</p> <p>2 the entry gates of the prison vans."</p> <p>3 Is that something you remember receiving over the</p> <p>4 radio?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. Then you say:</p> <p>7 "At some point I remember receiving information over</p> <p>8 the radio stating the persons within the car will use</p> <p>9 firearms to commit the offence."</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. Is that your recollection, that you were told that they</p> <p>12 will use firearms?</p> <p>13 <b>A. It was my interpretation at the time. So it was -- the</b></p> <p>14 <b>wording was "firearms enabled", and I interpreted that</b></p> <p>15 <b>as them utilising firearms to commit the offence.</b></p> <p>16 Q. You heard the words firearm enabled, your interpretation</p> <p>17 was that they will use firearms?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. Is that real firearms or imitation firearms?</p> <p>20 <b>A. Oh, real firearms.</b></p> <p>21 Q. Can you tell us, had you used yourself or heard used the</p> <p>22 term "firearms enabled" prior to this date?</p> <p>23 <b>A. Not that specific wording itself, as in the wording</b></p> <p>24 <b>"firearms enabled", I don't believe.</b></p> <p>25 Q. You had not heard the terms firearms enabled come over</p> <p style="text-align: center;">Page 179</p>  | <p>1 a radio before?</p> <p>2 <b>A. Similar, but not actually "firearms enabled", those two</b></p> <p>3 <b>words together, I don't believe.</b></p> <p>4 Q. I know I am going to test your memory but what sort of</p> <p>5 phrase had you heard before over a radio to indicate</p> <p>6 that firearms would be used during an offence?</p> <p>7 <b>A. Similar things to, "Weapons may be used", "Firearms may</b></p> <p>8 <b>be used in this offence", "Firearms will be used to</b></p> <p>9 <b>commit this offence", the type of weaponry that might be</b></p> <p>10 <b>used or will be use within an offence, so there is</b></p> <p>11 <b>varying degrees of very, very similar sort of wording</b></p> <p>12 <b>that I have heard.</b></p> <p>13 Q. Did you at the time consider the phrase firearms enabled</p> <p>14 to be ambiguous or were you confident in your</p> <p>15 interpretation of it?</p> <p>16 <b>A. Confident, yes.</b></p> <p>17 Q. Did you consider it necessary to ask for clarification</p> <p>18 from someone to say: what does that mean?</p> <p>19 <b>A. No.</b></p> <p>20 Q. Where did you understand at the time that the</p> <p>21 information was coming from that there would be firearms</p> <p>22 used?</p> <p>23 <b>A. I believed it was intelligence they were picking up from</b></p> <p>24 <b>potentially within the vehicle itself.</b></p> <p>25 Q. Were you expecting intelligence -- sorry, I am going at</p> <p style="text-align: center;">Page 180</p>                    |

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| <p>1 quite a pace, if you need me to break so you can pour<br/>2 a glass of water, just say.<br/>3 <b>A. It's fine.</b><br/>4 Q. Were you expecting at the time that information heard<br/>5 over the probe from within the Audi to be passed through<br/>6 C3000 to CTFSOs on the ground?<br/>7 <b>A. There is obviously protocols in place for passing of<br/>8 information. It will have to be filtered and monitored<br/>9 in relation to what they do pass to us. And that was<br/>10 what was decided on the day, not something we always<br/>11 question, because we know we are not entitled to<br/>12 receiving all of the intelligence.</b><br/>13 <b>So if it was being put up, it was relevant to us for<br/>14 a reason.</b><br/>15 Q. Let me ask in a slightly different way.<br/>16 At the point at which you deployed, were you<br/>17 expecting throughout the day to be receiving updates<br/>18 from within the car?<br/>19 <b>A. Yeah, potentially anything relevant to us, yes.</b><br/>20 Q. Anything relevant to you?<br/>21 <b>A. Yes.</b><br/>22 Q. What sort of things would be relevant for dissemination<br/>23 to you on the ground?<br/>24 <b>A. So definitely in relation to firearms and the threat we<br/>25 are going to come up against. Potentially anything</b></p> <p style="text-align: center;">Page 181</p>   | <p>1 <b>about their location, where they might be going, whether<br/>2 they are due to get out of the vehicle, weaponry used,<br/>3 level of threat they are looking to use.</b><br/>4 Q. How about the number of people in the car?<br/>5 <b>A. Yes, that all helps.</b><br/>6 Q. You said firearms. If the intelligence from within the<br/>7 car was that they had an imitation, as opposed to<br/>8 a real, firearm, would that have fallen within the<br/>9 category of relevant information to be passed to you as<br/>10 you have just described?<br/>11 <b>A. No, as in I wouldn't have wanted to know that -- if we<br/>12 were on a -- if we had been deployed or if we are still<br/>13 deployed on a job itself, there is a real threat that<br/>14 there is believed a real firearm involved. So that<br/>15 wouldn't have helped my threat assessment and when<br/>16 dealing with a firearm itself, when -- I have had a gun<br/>17 pointed at my face and you cannot tell whether it is<br/>18 real or not, so that wouldn't have aided me, no.</b><br/>19 Q. I just want to make sure we understand this part of your<br/>20 evidence very clearly.<br/>21 You said that you would expect information that was<br/>22 relevant to us to be passed to us and you said that is<br/>23 information about firearms and the threat.<br/>24 <b>A. Yes.</b><br/>25 Q. Would information that it was an imitation firearm in</p> <p style="text-align: center;">Page 182</p> |
| <p>1 the car, and not a real firearm, not be information<br/>2 about firearms or threat?<br/>3 <b>A. Yes, sorry, I was referring to more of the calibre of<br/>4 weapon, whether I am coming up against a small SLP<br/>5 firearm, compared to an automatic firearm, in relation<br/>6 to what weapon -- what specific weaponry.</b><br/>7 Q. I make it clear, my questioning is not to challenge you<br/>8 but really to understand you. Why is it useful to know<br/>9 information about the calibre of a weapon, information<br/>10 that might indicate that it is perhaps more dangerous,<br/>11 but it is not relevant or helpful to know information<br/>12 that might mean it is less dangerous? For example that<br/>13 it is an imitation as opposed to a real firearm?<br/>14 <b>A. Yeah, specifically that wording, you said might mean, it<br/>15 just puts -- it wouldn't be helpful for your mindset,<br/>16 because again on seeing whatever weapon I see, I am<br/>17 going to treat that as real, and --</b><br/>18 Q. Okay, so, again, I really don't want to paraphrase you<br/>19 incorrectly, is your evidence that if it is a real<br/>20 firearm, it will help you to know what calibre it is<br/>21 because that will build into my thinking about how to<br/>22 respond, but if the information is that it might be<br/>23 an imitation firearm, I am going to be believe that when<br/>24 I see it, so I am not going it put any weight to it?<br/>25 <b>A. Yes, I would still deal with it in the same manner as if</b></p> <p style="text-align: center;">Page 183</p> | <p>1 <b>it was a real firearm.</b><br/>2 Q. Finally, does that depend upon the nature or how certain<br/>3 the intelligence was from the car or would that not<br/>4 matter at all?<br/>5 I have put that clunkily, so I will make sure it is<br/>6 clear. If the intelligence from the car was very plain,<br/>7 which it may or may not ever be, it is an imitation,<br/>8 would your answer be different as opposed to it might be<br/>9 an imitation?<br/>10 <b>A. Not at that point, because it is not a trusted source<br/>11 and we would still have to actually take hold of the<br/>12 weapon and determine that ourselves.</b><br/>13 Q. Thank you, I am going to move on from that stage, you<br/>14 will probably be pleased to hear.<br/>15 At the time that firearms enabled came out across<br/>16 the radio, and you interpreted that to mean that they<br/>17 will use firearms to commit the offence, what was the<br/>18 status of your threat assessment at that time?<br/>19 <b>A. So, yeah, it was just heightened on the fact of that is<br/>20 confirming it, of what I believed anyway at that point.</b><br/>21 Q. Confirmed what you believed anyway, did it make the<br/>22 threat assessment any higher or just confirmed your<br/>23 existing threat assessment?<br/>24 <b>A. Yes, like I said, I already had a high risk assessment<br/>25 anyway but it did slightly heighten and it sort of</b></p> <p style="text-align: center;">Page 184</p>      |

46 (Pages 181 to 184)

1 pricks the ears up and makes you think, "Right, okay".  
 2 You know, focuses you.  
 3 Q. We know that it is around this time that state amber was  
 4 declared, is that an accurate description of your threat  
 5 assessment at the point at which state amber was  
 6 declared?  
 7 A. Yes.  
 8 Q. What did you understand state amber to mean for you?  
 9 A. So state amber is at the point of the operational going  
 10 over to us to perform the actual tactical role and  
 11 perform or get into a position where we can perform the  
 12 extraction or the stop itself.  
 13 Q. I think you have answered it, but did you understand  
 14 once state amber was declared that you were going to  
 15 drive round to Bracknell Close and conduct  
 16 an extraction?  
 17 A. Yes.  
 18 Q. Was there any discussion about that?  
 19 A. No.  
 20 Q. Did you think it was necessary to have any discussion  
 21 about that?  
 22 A. No.  
 23 Q. Again on the previous operations you have worked on,  
 24 would you generally have a discussion once state amber  
 25 is declared to say, "All right guys, what are we going

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1 to do?"  
 2 A. No, it would be prior, so it would have already been  
 3 discussed potentially or in relation to the threat and  
 4 intel we had received, it would already have been -- we  
 5 would have come to that conclusion in relation to what  
 6 tactic we are going to use. And if it was to change for  
 7 any reason, then that would have been discussed.  
 8 Q. Bearing in mind you had been sitting in Quicksilver and  
 9 looking at your iPad and Street View for some time now  
 10 whilst they were in Bracknell Close.  
 11 A. Yes.  
 12 Q. Were there any discussions during that period about, for  
 13 example, the use of contain and call out, bearing in  
 14 mind you were looking at the environments that you were  
 15 about to go into?  
 16 A. No, but I wouldn't have believed there would have been  
 17 anyway, just in relation to where it was parked and the  
 18 threat and the intel we had received anyway.  
 19 Q. There wasn't any discussion and nor would you expect  
 20 there to be any discussion?  
 21 A. No.  
 22 Q. Before you moved round to Bracknell Close, were you  
 23 aware that there were builders working in Bracknell  
 24 Close?  
 25 A. Yes.

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1 Q. You were. What was the relevance of that information at  
 2 that time?  
 3 A. It is massive. Suddenly you have got members of the  
 4 public within our area of working, so in theory it is  
 5 not really a sterile working area at that point and we  
 6 are going to have to be mindful of, yeah, members of the  
 7 public being potentially involved in our firearms  
 8 operation.  
 9 Q. Okay, and does it change your threat assessment at all  
 10 or just something you factor into how you go about  
 11 deploying whatever tactic?  
 12 A. Yes, it is more awareness of that.  
 13 Q. Moving then to, if we can, Bracknell Close, as you  
 14 pulled into Bracknell Close, you say in your statement  
 15 that you pulled on your baseball cap and a face  
 16 covering. I am asked to ask you what sort of face  
 17 covering that was?  
 18 A. Sure, it is an issue grey face covering, which we use  
 19 on -- because we deal with a lot of covert operations,  
 20 that we will place on. I am particularly mindful, being  
 21 a female officer, so I will always make sure I've got my  
 22 face covering on, because we are in the iPhone world  
 23 where people will record straight away.  
 24 Q. It is a fabric-face covering, you pull it up and it  
 25 conceals mainly the bottom half of your face?

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1 A. I will pull it up and it will go over my nose and my  
 2 mouth.  
 3 Q. Once you get out of the car, what did you do?  
 4 A. So the location of where our vehicle ended up, my focus  
 5 was on the driver side --  
 6 Q. I am going to interrupt, I'm going to take one step back  
 7 if I can to take it in order.  
 8 You pull up and at that stage you decide which items  
 9 of your equipment to take with you to get out of the  
 10 car, I said we will back to it, we will. What did you  
 11 take out of the car with you and why?  
 12 A. So I took my primary weapon, the SIG MCX, I had my Glock  
 13 holstered already on me, so that was coming regardless,  
 14 and then I chose to leave -- because I couldn't hear the  
 15 engine revving of the mission vehicle, so I chose to  
 16 leave (a) the Benelli shotgun, because I didn't believe  
 17 I needed it for any tyre deflation and (b) the launcher  
 18 due to close proximity, and I was looking to close down  
 19 the vehicle nice and quickly. So that wouldn't have  
 20 been a relevant option for me.  
 21 Q. Look at that in a little bit more detail, please.  
 22 In what circumstances will you use the Benelli?  
 23 A. So --  
 24 Q. Is that also what we know as Hatton rounds, are we  
 25 talking about the same thing?

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|  |  |
|--|--|
| <p>1 <b>A. Yes.</b></p> <p>2 Q. In what circumstances will you use that?</p> <p>3 <b>A. So for me personally, I would use it should I see the</b></p> <p>4 <b>vehicle trying to ram out of or bust its way out of</b></p> <p>5 <b>a stop that we have put on when we have tried to contain</b></p> <p>6 <b>with our vehicles. So then there a risk to us and</b></p> <p>7 <b>members of the public immediately. So I would deploy</b></p> <p>8 <b>with it then, to try and immobilise it by shooting out</b></p> <p>9 <b>the tyres.</b></p> <p>10 <b>Or if I could hear the engine revving at the point</b></p> <p>11 <b>where they have spotted us coming into the close, for</b></p> <p>12 <b>instance, so I think there is a realistic chance again</b></p> <p>13 <b>that it might try and evade or escape.</b></p> <p>14 Q. I understand that you say when you pulled up or when you</p> <p>15 are getting out of the car you cannot hear the car</p> <p>16 revving, so there was no indication at that point that</p> <p>17 they were trying to get away.</p> <p>18 How could you tell that they wouldn't at some future</p> <p>19 point during this intervention or interception try and</p> <p>20 rev away?</p> <p>21 <b>A. Yeah, absolutely, and that is a moment's split-second</b></p> <p>22 <b>decision and it is in relation to I have already got my</b></p> <p>23 <b>primary weapon with me, which I would want to have</b></p> <p>24 <b>anyway, and my Glock and then piling on another weapon,</b></p> <p>25 <b>obviously, it is -- it gets quite cumbersome and</b></p> <p style="text-align: center;">Page 189</p> | <p>1 <b>awkward, so you have to make that split-second decision</b></p> <p>2 <b>in relation to whether you can deploy with that or your</b></p> <p>3 <b>primary weapon.</b></p> <p>4 <b>And at that point, due to the threat, I was going</b></p> <p>5 <b>straight out with my primary weapon.</b></p> <p>6 Q. Would it have been possible for you to get out with your</p> <p>7 primary weapon, holstered Glock and bring with you the</p> <p>8 Benelli and Hatton rounds?</p> <p>9 <b>A. I mean, it can be achieved, however you have suddenly</b></p> <p>10 <b>got two -- I mean the Benelli is quite long, you have</b></p> <p>11 <b>suddenly got two big guns draped over you which get in</b></p> <p>12 <b>the way and then you have got identification quickly</b></p> <p>13 <b>with selecting which gun, so I would prefer to either</b></p> <p>14 <b>select one or the other.</b></p> <p>15 Q. So you can only carry one at a time, in your hands ready</p> <p>16 to go?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. The second would have to be holstered or worn across you</p> <p>19 in some way?</p> <p>20 <b>A. Yes, that is the thing, both those weapons you need both</b></p> <p>21 <b>hands for.</b></p> <p>22 THE CHAIRMAN: If it is being suggested that more than one</p> <p>23 primary weapon should be carried, then I think we may</p> <p>24 need to see the sort of weaponry that we are concerned</p> <p>25 with in order for me to decide whether it is too</p> <p style="text-align: center;">Page 190</p> |
| <p>1 cumbersome to expect more than one potentially lethal</p> <p>2 weapon to be carried.</p> <p>3 MS MCNEILL: Sir, we can definitely look into that, if it is</p> <p>4 necessary. I make it clear my questions --</p> <p>5 THE CHAIRMAN: If anybody thinks that I am barking up</p> <p>6 an inappropriate tree, then they will say so, but on the</p> <p>7 face of it, if there is a line of questioning designed</p> <p>8 to suggest that any number of weapons should be carried,</p> <p>9 to cater for any given eventuality, then I am going to</p> <p>10 need to see how practical this was.</p> <p>11 MS MCNEILL: Sir, yes, and just so it is clear, my</p> <p>12 questioning, sir, is not intended to suggest that as</p> <p>13 a positive.</p> <p>14 THE CHAIRMAN: I know that, but I am equally conscious of</p> <p>15 the fact that you are questioning from the standpoints</p> <p>16 of a number of core participants.</p> <p>17 MS MCNEILL: Exactly that, sir, and we have had some</p> <p>18 questions in about the Hatton rounds. Can I suggest</p> <p>19 perhaps, sir, that we take some soundings from the core</p> <p>20 participants about what might be a sensible way forward.</p> <p>21 THE CHAIRMAN: Thank you.</p> <p>22 MS MCNEILL: For the purposes of now, sir, I think the</p> <p>23 witness has answered all my questions on why she chose</p> <p>24 not to take that particular item with her and I don't</p> <p>25 propose to take it any further with this witness.</p> <p style="text-align: center;">Page 191</p>   | <p>1 THE CHAIRMAN: Very good.</p> <p>2 MS MCNEILL: Can we talk, again probably not in as much</p> <p>3 detail, but you didn't bring the baton launcher with</p> <p>4 you, is that a large item? Is that something you could</p> <p>5 have carried in addition to your primary weapon or again</p> <p>6 would you have had to make a decision as between the</p> <p>7 two?</p> <p>8 <b>A. On that particular occasion, due to us closing down,</b></p> <p>9 <b>I precluded that as a tactical option as I was going to</b></p> <p>10 <b>be too close to actually even utilise it.</b></p> <p>11 Q. So the launcher is used from a greater distance?</p> <p>12 <b>A. A slightly -- yeah, you have got a minimum distance of</b></p> <p>13 <b>three metres, and also they are within a vehicle and</b></p> <p>14 <b>I mean this round, this rubber round will bounce off</b></p> <p>15 <b>something and potentially then ricochet and --</b></p> <p>16 THE CHAIRMAN: If the object of the exercise is to aim at</p> <p>17 a belt, the chance is you are not going to be able to</p> <p>18 see a belt anyway.</p> <p>19 <b>A. Exactly.</b></p> <p>20 MS MCNEILL: You didn't take a launcher and that is because,</p> <p>21 for the purposes of this extraction, it wasn't</p> <p>22 appropriate?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. I interrupted. We will go back to what did you do once</p> <p>25 you got back to the car with the equipment we have</p> <p style="text-align: center;">Page 192</p>                           |



1 discussed?

2 **A. I ran over to the driver's door, because that was the**

3 **closest area of danger to me of where I alighted from**

4 **the Charlie vehicle.**

5 Q. Can we please look at -- it might help you, INQ21, on

6 the screen.

7 **A. Yes.**

8 Q. This might help you a little bit. This is only a very

9 broad approximation, I should say, it is a snapshot in

10 time, so it is not all of your movements.

11 You got out of the car and you started making your

12 way to the driver' side of the car; is that right?

13 **A. Yes.**

14 Q. Again, is there any particular reason you went to the

15 driver's side?

16 **A. So where I came out of the Charlie vehicle, that was my**

17 **first point of danger and also when it comes to the**

18 **driver, we want to immobilise that car straight away.**

19 Q. Could you at that point see into the car?

20 **A. No, I couldn't, the windows were steamed up.**

21 Q. We heard some evidence that the driver of the vehicle,

22 Mr Mason, may have tried to wipe the steam away from the

23 windows so he could see out and/or you could see in. Is

24 that something you noticed at the time?

25 **A. No, not at all.**

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1 assessment throughout. At this stage is it still high

2 or even higher still?

3 **A. Even higher now, now the fact that I cannot see within,**

4 **I haven't got any control of the subjects within, where**

5 **their hands are, where this weaponry is, yeah, it was --**

6 **it was massive at that point.**

7 Q. Okay. We heard from V68 that he first tried to smash

8 the driver's door, did you see that?

9 **A. I haven't put it in my statement, but I do recall that.**

10 Q. He then opened the driver's door. Did you see that?

11 **A. Yes, I did.**

12 Q. What did you do as he opened the driver's side door?

13 **A. So we normally working in pairs around a vehicle if we**

14 **can, and also due to me being on team with V68, we kind**

15 **of work well together and you know what each other are**

16 **going to do, so I had firearms cover on the waiting for**

17 **the door to open basically while he was opening it, so**

18 **that I could then have both hands on the weapon ready**

19 **to, if I needed to use it.**

20 Q. Okay, so he opened the door, and he told us he was

21 standing at the open side of the door, for want of

22 a better word. Where were you standing once the door

23 had opened?

24 **A. I had moved round with him at that point, so I could get**

25 **clear vision in.**

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1 Q. Okay.

2 You couldn't see within the vehicle you are moving

3 towards, and you are carrying your primary weapon, your

4 MCX?

5 **A. Yes.**

6 Q. What did you do as you reached the vehicle?

7 **A. So I started shouting armed police commands as I was**

8 **closing down or approaching the vehicle. I couldn't see**

9 **within, I already had the heightened risk that they**

10 **potentially had automatic firearms within of, like**

11 **I said, a soft-skinned unarmoured car. So at that point**

12 **my risk was massive, I was genuinely quite concerned**

13 **thinking they could be within with a firearm about to**

14 **fire out through which would have just come straight out**

15 **of the car.**

16 Q. What you say at page 3 of your witness statement at the

17 top was:

18 "At this time I didn't feel comfortable knowing

19 these males who potentially had automatic firearms and

20 the intent to use them were definitely within the

21 vehicle and I couldn't see them. I know the devastation

22 an automatic firearm can cause and it would have easily

23 gone through the soft-skin vehicle and far beyond."

24 **A. Yes.**

25 Q. We have touched on your risk assessment, threat

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1 Q. Okay, and, again, forgive me for asking, obvious

2 question, just for the purposes of understanding, you

3 moved around door specifically so you could see more

4 clearly into the car so that the door itself couldn't

5 obstruct your vision?

6 **A. Yes.**

7 Q. What did you see when you were looking into the car?

8 **A. I could see a male sat in the driver's seat, at which**

9 **point I asked him to show me his hands.**

10 Q. You said as you were walking towards the car you shouted

11 armed police commands?

12 **A. Yes.**

13 Q. As you were walking towards the car, are you shouting

14 any commands to the occupants in the car or were you

15 just shouting "armed police"?

16 **A. Well, I was probably running towards the car and I would**

17 **be shouting that, because, again, a fellow gang we would**

18 **want to shout "armed police" so that everyone was aware**

19 **that they were being closed down by armed police, as**

20 **opposed to a fellow gang.**

21 Q. When you reached the car and you are shouting, "Police

22 show me your hands"?

23 **A. Hmm.**

24 Q. Again, forgive me if it is an obvious question but why

25 do you say "show me your hands", as opposed to "hands

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|   |   |
|---|---|
| <p>1 up, stay still"? How do you decide what command to give</p> <p>2 at that time?</p> <p>3 <b>A. I don't want to overcomplicate it, I just want to see</b></p> <p>4 <b>their hands so that I can see they are not on any kind</b></p> <p>5 <b>of weapon, which they would obviously use to operate, so</b></p> <p>6 <b>I just want to see their hands and ...</b></p> <p>7 Q. Could you hear what V68 was shouting?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Is there any attempt as between to you make sure that</p> <p>10 the commands are consistent?</p> <p>11 <b>A. I mean in training we will -- we will shout commands</b></p> <p>12 <b>within showing hands, et cetera but it is a personal</b></p> <p>13 <b>preference at that immediate point, because you don't</b></p> <p>14 <b>know what you are going to come up against, so it will</b></p> <p>15 <b>be your assessment and what you feel is needed at that</b></p> <p>16 <b>point.</b></p> <p>17 Q. Could you see his hands throughout the time he was in</p> <p>18 the car until he was put on the ground?</p> <p>19 <b>A. So no. So initially, I could see him place his hands</b></p> <p>20 <b>above him, well, when he was in the car itself.</b></p> <p>21 <b>He was then extracted and then I lost sight of one</b></p> <p>22 <b>of his hands, which concerned me.</b></p> <p>23 Q. Okay. Taking it one step at the time, whilst he was in</p> <p>24 the car you could still see his hands, is that relevant</p> <p>25 to your risk assessment?</p> <p style="text-align: center;">Page 197</p>  | <p>1 <b>A. 100 per cent, yes.</b></p> <p>2 Q. Is the risk assessment probably I imagine still high,</p> <p>3 reduced slightly in that you could see his hands?</p> <p>4 <b>A. That's correct.</b></p> <p>5 Q. Could you see whether or not he was holding a weapon?</p> <p>6 <b>A. No, he wasn't.</b></p> <p>7 Q. V68 was the one who extracted him from the car; is that</p> <p>8 right?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. What happened as V68 extracted Mr Mason from the car?</p> <p>11 <b>A. At that point then I have just referred to my statement</b></p> <p>12 <b>and at that point I heard the loud bang.</b></p> <p>13 Q. Did you know what it was?</p> <p>14 <b>A. So at the time, I assessed it as a potential Hatton</b></p> <p>15 <b>round from one of the other vehicles maybe using to</b></p> <p>16 <b>deflate a tyre.</b></p> <p>17 THE CHAIRMAN: Why did you think it was a Hatton round?</p> <p>18 <b>A. So just due to the trained scenarios, just hearing the</b></p> <p>19 <b>bang, I just presumed it was -- that was how I assessed</b></p> <p>20 <b>it at that point.</b></p> <p>21 THE CHAIRMAN: Wouldn't a Hatton round normally be</p> <p>22 associated with a revving engine?</p> <p>23 <b>A. Potentially, but I can't judge for someone else's threat</b></p> <p>24 <b>assessment, they may have seen something different from</b></p> <p>25 <b>me --</b></p> <p style="text-align: center;">Page 198</p>                                  |
| <p>1 THE CHAIRMAN: Why did you conclude it was a Hatton round</p> <p>2 rather than a gun, a shot, a firearm being used?</p> <p>3 <b>A. Yeah, it was just that -- the more of a thud sound,</b></p> <p>4 <b>I just thought it was more of a -- it reminded me of</b></p> <p>5 <b>a training scenario and hearing a Hatton round.</b></p> <p>6 THE CHAIRMAN: Thank you.</p> <p>7 MS MCNEILL: Again, you might not be able to help us, but</p> <p>8 some evidence we had heard suggests there would be</p> <p>9 generally speaking a significant difference in the sound</p> <p>10 of the MCX and the Hatton round. Can you help us with</p> <p>11 that and does that contribute to why you thought it was</p> <p>12 a Hatton round?</p> <p>13 <b>A. Yes, I don't know if it was the distortion of the sound</b></p> <p>14 <b>or whatever it was but, like I said, it sounded more</b></p> <p>15 <b>thuddy, which is why I thought it was a shotgun round as</b></p> <p>16 <b>opposed to anything else at that point.</b></p> <p>17 Q. Could you tell at that stage whether anybody was</p> <p>18 injured?</p> <p>19 <b>A. No, and I didn't presume they were, I just carried on</b></p> <p>20 <b>with what I was doing.</b></p> <p>21 Q. What did you do then with regards to Mr Mason after he</p> <p>22 was extracted from the car?</p> <p>23 <b>A. Yeah, so my primary concern was still obviously dealing</b></p> <p>24 <b>with him, he hadn't been secured or searched. So I just</b></p> <p>25 <b>concentrated on covering for V68 while he extracted the</b></p> <p style="text-align: center;">Page 199</p> | <p>1 <b>male.</b></p> <p>2 Q. You said before when I interrupted you that as he came</p> <p>3 out of the car you lost sight of one of his hands?</p> <p>4 <b>A. Yes, when he was put onto the floor I have then lost</b></p> <p>5 <b>sight of one of his hands, which was a concern of mine</b></p> <p>6 <b>because he hadn't -- like I said, he hadn't been</b></p> <p>7 <b>searched, the waistband, where habitually a lot of</b></p> <p>8 <b>people that we deal with will hide or conceal a weapon</b></p> <p>9 <b>in.</b></p> <p>10 Q. What did you do when you couldn't see his hand?</p> <p>11 <b>A. At that point, I used a distraction strike, using my</b></p> <p>12 <b>foot I kicked him to his upper torso area, shouting</b></p> <p>13 <b>"Show me your hands", or words to that effect.</b></p> <p>14 Q. Did he show you his hands?</p> <p>15 <b>A. Not initially, no.</b></p> <p>16 Q. What did you do?</p> <p>17 <b>A. I believe -- well, I ...</b></p> <p>18 <b>I believe I waited until it was free. I think it</b></p> <p>19 <b>was moments, within ...</b></p> <p>20 Q. Just out of fairness to you, I am going to bring up</p> <p>21 a little bit of what Mr Mason said, if I can.</p> <p>22 Can we have MPS14, please, Mr Coates, page 2.</p> <p>23 Fourth paragraph he says:</p> <p>24 "I was put on the floor and they put string-type</p> <p>25 handcuffs on me, I next remember being kicked in the</p> <p style="text-align: center;">Page 200</p> |

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| <p>1 right side of my ribs by an officer wearing brown boots,<br/>2 who I believe was male."<br/>3 Would that actually have been you?<br/>4 <b>A. Yes, I was wearing brown boots.</b><br/>5 Q. You had your mask on, it is fine:<br/>6 "The officers were saying 'don't look at me' and<br/>7 gave me another kick."<br/>8 Did you say "don't look at me"?<br/>9 <b>A. No.</b><br/>10 Q. Did you kick more than once?<br/>11 <b>A. No.</b><br/>12 Q. "The female officer struck me to the left side of my<br/>13 cheekbone area. I think this was done with her gun,<br/>14 this caused reddening and bruising that was later<br/>15 photographed at the police station."<br/>16 Did you strike him to the cheekbone?<br/>17 <b>A. No.</b><br/>18 Q. Did you strike him with your gun?<br/>19 <b>A. No.</b><br/>20 Q. Did you then check Mr Mason for injuries?<br/>21 Thank you, we can take that down.<br/>22 <b>A. Yes, I did.</b><br/>23 Q. Bottom of page 3 of your statement.<br/>24 Did you in the course of checking him for injuries<br/>25 cut his clothing from him?</p> <p style="text-align: center;">Page 201</p>   | <p>1 <b>A. Yes, I did, that's a matter of course we would do if<br/>2 someone was injured.</b><br/>3 Q. We know that he was uninjured, apart from there was some<br/>4 reddening to his face?<br/>5 <b>A. Yes.</b><br/>6 Q. You could see, could you, that he was wearing plastic<br/>7 gloves underneath fingerless gloves?<br/>8 <b>A. Yes.</b><br/>9 Q. Looking at page 4 of your statement, third line down,<br/>10 you say:<br/>11 "People from nearby buildings had begun to gather on<br/>12 balconies and windows."<br/>13 Again, is that what you would expect during an armed<br/>14 operation, do people often come out to have a look at<br/>15 what is going on?<br/>16 <b>A. Yeah, all the time.</b><br/>17 Q. Were you involved in arranging for Mr Mason to be<br/>18 transported to the police station?<br/>19 <b>A. Yes, I handed Mr Mason over to one of the local units.</b><br/>20 Q. We know there were others giving first aid to Mr Baker<br/>21 at that time. Were you involved in giving any first aid<br/>22 to Mr Baker?<br/>23 <b>A. No, I wasn't.</b><br/>24 Q. Did you see any of the first aid at all?<br/>25 <b>A. Yeah I saw some of the first aid taking place. When</b></p> <p style="text-align: center;">Page 202</p>   |
| <p>1 <b>I looked over, I could see the HEMS, the helicopter<br/>2 team, had arrived and they were performing lifesaving<br/>3 medical attention.</b><br/>4 Q. We will hear from those involved in that medical<br/>5 attention about what happened.<br/>6 I am asked to just cover a few extra details with<br/>7 you, if I can.<br/>8 Turn in your bundle, please, to tab 6, there is<br/>9 a witness statement from you dated 5 February 2016.<br/>10 <b>A. Hmm.</b><br/>11 Q. At the end of that statement, the final paragraph on<br/>12 page 3, you set out there your experience of W80 --<br/>13 <b>A. Hmm.</b><br/>14 Q. -- the individual. Is it right that at that point you<br/>15 had known W80 for three years, mainly as a firearms<br/>16 instructor?<br/>17 <b>A. Yes.</b><br/>18 Q. Had he taught you on several firearms courses?<br/>19 <b>A. Yes, he had.</b><br/>20 Q. You describe him here as "one of the most professional<br/>21 and competent firearms officers" you know?<br/>22 <b>A. Absolutely.</b><br/>23 Q. You describe his person, you said he was lovely, bubbly<br/>24 and always has the time of day for you?<br/>25 <b>A. Yes, a great guy.</b></p> <p style="text-align: center;">Page 203</p> | <p>1 Q. Did you know him outside of work?<br/>2 <b>A. No.</b><br/>3 Q. Is he somebody you worked with regularly?<br/>4 <b>A. Yes, worked with.</b><br/>5 Q. Is he somebody you would go to if you had any questions?<br/>6 <b>A. 100 per cent.</b><br/>7 Q. Would he know the answer?<br/>8 <b>A. He would, he was he is sound minded and someone I can<br/>9 trust and rely on.</b><br/>10 Q. Did you have much contact with him on the date of<br/>11 11 December?<br/>12 <b>A. Not massively, in the post-incident process I did,<br/>13 because you can tell when someone has been involved in<br/>14 something and I could tell at the time that he was<br/>15 involved.</b><br/>16 Q. Can we look, please, different topic, going back to the<br/>17 briefings, a brief point on the briefings, if I can.<br/>18 Can we look, Mr Coates at IPC537.<br/>19 Page 1, just bear with me. We see the bullet<br/>20 points, in the middle of the page. Then two paragraphs<br/>21 down, there is a paragraph beginning, "Reliable ..."<br/>22 Can we zoom out that paragraph, please, Mr Coates:<br/>23 "Reliable and high graded intelligence indicates<br/>24 that there is an ongoing conspiracy to assist Izzet Eren<br/>25 in escaping from custody on Friday, 11 December 2015.</p> <p style="text-align: center;">Page 204</p> |

51 (Pages 201 to 204)

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| <p>1 The intelligence suggests that those seeking to carry<br/>2 out this offence will be in possession of firearms and<br/>3 other weapons."<br/>4 Sir, just for context, we see at the top the author<br/>5 is V64, this is the briefing note I understand he<br/>6 prepared for the 3.00 am Leman Street briefing, it is<br/>7 not recorded, sir, I don't think -- I will probably be<br/>8 corrected now -- but that he said he read his briefing<br/>9 note out largely verbatim.<br/>10 From memory.<br/>11 The fact that the intelligence was graded as<br/>12 reliable and high grade, was that significant to you?<br/>13 <b>A. It would have been, yes.</b><br/>14 Q. Does the fact that the intelligence was reliable and<br/>15 high grade and indicated that those seeking to carry out<br/>16 this offence would be in possession of firearms, did<br/>17 that mean you gave it greater weight than perhaps it<br/>18 might have been had it said "some intelligence" or "weak<br/>19 intelligence" or the like?<br/>20 <b>A. Yeah, absolutely. It would have -- I don't personally<br/>21 recall that specific verbatim comment, I didn't know at<br/>22 which briefing point, now, when that came up, but that<br/>23 is something, yeah, of course it would add weight.</b><br/>24 Q. Was it your understanding at the conclusion of this<br/>25 briefing, therefore, that the intelligence that there</p> <p style="text-align: center;">Page 205</p> | <p>1 would be firearms and other weapons was reliable?<br/>2 <b>A. Yes.</b><br/>3 Q. Thank you.<br/>4 Of course it says "and other weapons", did you have<br/>5 any idea at the conclusion of this briefing what other<br/>6 weapons that might be?<br/>7 <b>A. No.</b><br/>8 Q. The fact that it mentions other weapons, did that add<br/>9 anything to your threat assessment or were you focused<br/>10 on the firearms?<br/>11 <b>A. I can't recall that.</b><br/>12 Q. Okay.<br/>13 For the avoidance of any doubt, would you have<br/>14 understood "possession of firearms" to indicate real<br/>15 firearms or imitation firearms?<br/>16 <b>A. Real.</b><br/>17 Q. Thank you.<br/>18 If we can turn to page 2 of the same document.<br/>19 Looking at number 4 at the very bottom of the page<br/>20 if we can, so again this -- we are led to believe this<br/>21 formed part of the briefing you received at 3.00 am on<br/>22 Leman Street:<br/>23 "Video-link, the court appearance or transfer to<br/>24 court."<br/>25 We know, you don't have the benefit of context, we</p> <p style="text-align: center;">Page 206</p>  |
| <p>1 do, that this was one of the options that was considered<br/>2 for disrupting this conspiracy.<br/>3 But it says:<br/>4 "... temporary disruption of Friday's plan will<br/>5 reduce the risk on the day, but there will be ongoing<br/>6 public protection vulnerabilities should an attempt be<br/>7 planned at a later stage, for example a hospital visit<br/>8 or other manufactured reason ..."<br/>9 Thank you very much.<br/>10 Can we have the last bit on page 3:<br/>11 "... manufactured reason for leaving prison. At<br/>12 this stage, police would not be in possession of the<br/>13 same quality of intelligence or have the operational<br/>14 assets available."<br/>15 At the conclusion of this briefing, and having<br/>16 received this information, did you interpret that to<br/>17 mean that there was a concrete plan B by the<br/>18 conspirators to attempt a breakout during a hospital<br/>19 visit or that this was a possibility? A future<br/>20 possibility?<br/>21 <b>A. Yeah, I believed that it would be a future possibility<br/>22 that they would try and break him out regardless at<br/>23 a later date, so if we didn't intervene then, it would<br/>24 have come up and it would have been in a situation that<br/>25 was out of our control.</b></p> <p style="text-align: center;">Page 207</p>  | <p>1 Q. When I took you through your statement earlier, you had<br/>2 noted what you thought were the most important parts of<br/>3 that briefing?<br/>4 <b>A. Yes.</b><br/>5 Q. This doesn't feature in that, I am not criticising<br/>6 you --<br/>7 <b>A. Yes.</b><br/>8 Q. Do we take it from that that this was not at the time<br/>9 a significant part of the briefing for you?<br/>10 <b>A. No, I saw this as more justification in and around the<br/>11 deployment of us and why we are going ahead with the<br/>12 operation. It was more to do with that.</b><br/>13 Q. Thank you.<br/>14 THE CHAIRMAN: More chance of obtaining sustained public<br/>15 protection in this environment than if there was<br/>16 a feigned hospital visit; is that the point?<br/>17 <b>A. 100 per cent, yes.</b><br/>18 THE CHAIRMAN: Thank you.<br/>19 MS MCNEILL: Can we take that down, please, Mr Coates.<br/>20 Do you know -- or did you at the time, is probably<br/>21 the better question, that in order for AFOs to be<br/>22 deployed, in order for them to be authority for<br/>23 a deployment, there is reason to suppose that someone,<br/>24 in this case the subjects in the car, might have access<br/>25 to firearms or are otherwise so dangerous that armed</p> <p style="text-align: center;">Page 208</p> |

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|--|--|
| <p>1 deployment is authorised?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Did you know that to be the test for the authority?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. One aspect of it, I imagine.</p> <p>6 If the intelligence was that the weapon was or might</p> <p>7 be an imitation, from your experience would there still</p> <p>8 be the justification for an armed deployment?</p> <p>9 <b>A. If it was confirmed it was an imitation, no. It would</b></p> <p>10 <b>have been -- we wouldn't have been deployed on that job,</b></p> <p>11 <b>potentially.</b></p> <p>12 Q. What about the bit that says, "Otherwise so dangerous</p> <p>13 that armed deployments are authorised"? Are you on</p> <p>14 occasion deployed even where there is not a firearm</p> <p>15 present with the subjects?</p> <p>16 <b>A. There has been incidents in relation to their manner and</b></p> <p>17 <b>utilising maybe say for instance a Samurai sword as</b></p> <p>18 <b>opposed to a firearm, and due to the nature of how they</b></p> <p>19 <b>are behaving and what they are doing. In my eyes, in</b></p> <p>20 <b>relation to this, it was built around them actually</b></p> <p>21 <b>having the access to the firearm which made them</b></p> <p>22 <b>otherwise so dangerous or made them dangerous.</b></p> <p>23 Q. Sticking with that point, if we can. I can bring it up</p> <p>24 if it assists you, it is COP12, page 40, Mr Coates.</p> <p>25 I understand it is something you will likely be familiar</p> <p style="text-align: center;">Page 209</p> | <p>1 with.</p> <p>2 Are you trained to treat all firearms as real and</p> <p>3 loaded until it is proven otherwise?</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. Does that apply unless and until the authority to deploy</p> <p>6 is rescinded?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. Throughout the time that you are deployed, you are</p> <p>9 required or trained, sorry, to treat all firearms as</p> <p>10 real until you know that they are not?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Was it the effect of the briefing that you received on</p> <p>13 that day to treat all firearms as real unless and until</p> <p>14 you know otherwise?</p> <p>15 <b>A. It is down to my training and my experience. Like</b></p> <p>16 <b>I said, I have had a gun put in my face and you can't</b></p> <p>17 <b>tell whether it is real or not.</b></p> <p>18 THE CHAIRMAN: I think I have used the phrase before, you</p> <p>19 assume the worst-case scenario?</p> <p>20 <b>A. Yes.</b></p> <p>21 THE CHAIRMAN: Yes.</p> <p>22 MS MCNEILL: Sir, I think that concludes everybody's</p> <p>23 questions, including my own.</p> <p>24 Do you have any questions?</p> <p>25 THE CHAIRMAN: No, thank you very much indeed.</p> <p style="text-align: center;">Page 210</p>  |
| <p>1 <b>A. Okay, thank you.</b></p> <p>2 <b>Questions from THE CHAIRMAN</b></p> <p>3 THE CHAIRMAN: Just one, I'm sorry, yes.</p> <p>4 You have mentioned the weaponry, and we have heard</p> <p>5 that a previous witness, V68, took a Taser with him?</p> <p>6 <b>A. Yes.</b></p> <p>7 THE CHAIRMAN: Did you have a Taser as well?</p> <p>8 <b>A. No, I didn't.</b></p> <p>9 THE CHAIRMAN: Do you know whether the driver had a Taser?</p> <p>10 <b>A. Normally the driver would have a Taser, yes, in our</b></p> <p>11 <b>deployments.</b></p> <p>12 THE CHAIRMAN: Yes.</p> <p>13 So the position is this, is it, if the front-seat</p> <p>14 passenger has a Taser, that means that probably there</p> <p>15 are two in the car? If the front-seat passenger doesn't</p> <p>16 have a Taser, the driver certainly will have access to</p> <p>17 one. Is that a fair way of putting it?</p> <p>18 <b>A. Yes.</b></p> <p>19 THE CHAIRMAN: Thank you.</p> <p>20 MS MCNEILL: Sir, I think that concludes this witness's</p> <p>21 evidence and in fact our evidence for today.</p> <p>22 THE CHAIRMAN: Very good.</p> <p>23 Thank you very much indeed.</p> <p>24 <b>A. Thank you.</b></p> <p>25 THE CHAIRMAN: Thank you for your patience.</p> <p style="text-align: center;">Page 211</p>  | <p>1 Tomorrow I think is likely to be a shorter day, but</p> <p>2 we are going to I think use the time to catch up with</p> <p>3 some evidence which has to be read or summarised in some</p> <p>4 way or another.</p> <p>5 MS MCNEILL: Indeed, sir, we have three CTSFOs listed for</p> <p>6 tomorrow, who are likely to be a similar length to this</p> <p>7 witness's evidence.</p> <p>8 THE CHAIRMAN: A morning's evidence probably.</p> <p>9 MS MCNEILL: Yes, if not just slightly more perhaps.</p> <p>10 THE CHAIRMAN: Then we will do some reading, you will do</p> <p>11 some reading or someone will do some reading.</p> <p>12 MS MCNEILL: Someone will read something to catch up on</p> <p>13 time.</p> <p>14 THE CHAIRMAN: I know that Mr Baker's family are unlikely to</p> <p>15 remain for read evidence. So if we can complete the</p> <p>16 live evidence by lunchtime, then we will do so to save</p> <p>17 them the need for coming back in the afternoon.</p> <p>18 MS MCNEILL: Thank you for that indication, sir.</p> <p>19 THE CHAIRMAN: Okay, thank you very much.</p> <p>20 10.00 in the morning. Thank you very much.</p> <p>21 (3.49 pm)</p> <p>22 (The inquiry adjourned until 10.00 am the following day)</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 212</p> |

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