

<p>1 Tuesday, 20 July 2021 2 (10.00 am) 3 THE CHAIRMAN: Good morning, everybody. 4 MS BLACKWELL: Good morning, sir. 5 May the witness be sworn, please? 6 THE CHAIRMAN: He may, thank you. 7 Will you stand to take the oath, please? 8 W80 (sworn) 9 Questions from MS BLACKWELL 10 MS BLACKWELL: May the witness be seated, please? 11 THE CHAIRMAN: He may, of course. 12 MS BLACKWELL: Thank you. 13 For the purposes of this inquiry, are you known by 14 the cipher W80? 15 A. Yes, sir. 16 Q. Are you an officer in the Metropolitan Police? 17 A. I am. 18 Q. During the course of the IPCC investigation, and more 19 recently within this inquiry, have you provided eight 20 witness statements? 21 A. Yes, I have, sir. 22 Q. We shall refer to them from time to time throughout the 23 course of your evidence. 24 Do you have a hard copy bundle -- 25 A. Yes.</p> <p style="text-align: center;">Page 1</p>	<p>1 Q. -- that contains your witness statements and some other 2 documents as well, but we will be using the electronic 3 presentation system to refer to documents as well. 4 I would like to begin my questioning by summarising 5 with you your training and experience within the 6 Metropolitan Police Service and in particular your roles 7 as a firearms officer and a firearms trainer. To help 8 us with this, may I invite you, please, to look behind 9 tab 8 in our hard copy bundle. 10 Sir, this is the most recent statement provided by 11 this officer dated 4 March of this year. 12 THE CHAIRMAN: Thank you. 13 MS BLACKWELL: I don't ask that we put it on screen, but 14 I am just going to take you through what you have 15 provided to the inquiry by way of your background as 16 a police officer. 17 Are you now 50 years old? 18 A. I am. 19 Q. Have you been a police officer for 31 years, having 20 joined the Metropolitan Police in 1989? 21 A. That's correct. 22 THE CHAIRMAN: Can I ask you to take the microphone a little 23 bit towards you, because your voice I think will be 24 amplified slightly. Your voice is understandably soft, 25 but it is a very big room and there are a lot of people</p> <p style="text-align: center;">Page 2</p>
<p>1 who wish to hear what you say. 2 A. I understand, sir. 3 THE CHAIRMAN: Thank you very much. 4 MS BLACKWELL: Thank you, that is much better. 5 Before joining the police, were you a police cadet? 6 A. Yes, I was. 7 Q. Have you been a firearms officer since 1998? 8 A. That is when I completed my first firearms course, yes. 9 Q. Thank you. 10 Did you then go to what was known as Old Street and 11 serve as an ARV officer in a team that provided an armed 12 response capability 24 hours a day? 13 A. I did. 14 Q. You then moved to Lambeth, whilst still on ARV duty? 15 A. That's correct. 16 Q. In 2004 you began to train with a view to becoming 17 a specialist firearms officer? 18 A. That's correct, yes. 19 Q. That involved you passing a course to become a tactical 20 support team firearms officer, or a TST? 21 A. Yes. 22 Q. Which you passed in 2004. 23 You then worked on the TSTs for just over two years 24 based at Leman Street? 25 A. That's correct.</p> <p style="text-align: center;">Page 3</p>	<p>1 MS BLACKWELL: Which, as you know, sir, is a base that the 2 inquiry has heard about. 3 THE CHAIRMAN: Yes. 4 MS BLACKWELL: In 2007, you became a firearms instructor 5 based at Gravesend. 6 You then applied to become an SFO in August 2010, 7 and completed all of your SFO courses the same year? 8 A. That's correct. 9 Q. You joined the SFO operational team in 2011 and started 10 a training role at Gravesend in 2013? 11 A. That's correct. 12 Q. You then joined the SFO operational team again in 2015. 13 Whilst you were in a training role, you still took on 14 operational roles on occasion? 15 A. That's correct. 16 Q. And you have undertaken training and passed examinations 17 in: weapons handling and firing; close-quarter tactics; 18 rapid intervention; entering premises and vehicles; 19 plainclothes surveillance; intervention and arrest; and 20 judgment training, where you have described obtaining 21 experience on how to make split-second decisions on 22 whether to fire or not and to be able to justify your 23 actions? 24 A. That's correct, sir. 25 Q. Are you vetted to handle sensitive intelligence?</p> <p style="text-align: center;">Page 4</p>

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<p>1 A. I am. 2 Q. So in summary, since 2011 and up to the date of this 3 incident on 11 December 2015, save for the period 4 between November 2013 and November 2015 whilst you 5 worked as a firearms instructor, you have been 6 an operational counter-terrorism specialist firearms 7 officer? 8 A. That's correct, sir. 9 Q. Your training was up to date as at 11 December 2015? 10 A. Yes. 11 Q. There were no outstanding training courses as at that 12 date? 13 A. No. 14 Q. You met all of your competencies required that were 15 achieved through regular training, when each competency 16 would be ticked off and to reclassify on each weapon by 17 attending the firing range to shoot each weapon for 18 which you achieve the required pass mark? 19 A. That's correct, sir. 20 Q. Your understanding is that the your firearms authorities 21 were renewed annually? 22 A. Yes, they were. 23 Q. And that there had been no issues raised with you during 24 any of the renewal processes? 25 A. No issues at all.</p> <p style="text-align: center;">Page 5</p>	<p>1 Q. Right. 2 I would like to return to four issues, please, 3 relating to the information that we have just set out. 4 The first is this. 5 What was the reason that you commenced your training 6 role in 2007? 7 A. Having served on the ARVs and the TSTs, it sort of was 8 a natural development and it was also sort of expected 9 that someone who had been on a team for that amount of 10 time would move into a training role. 11 THE CHAIRMAN: I know that they are second nature to you, 12 but acronyms are not my strong point. 13 A. Sorry, sir. 14 THE CHAIRMAN: That is all right. I suspect there are a lot 15 of people who will not immediately pick up, so if you 16 can avoid using acronyms, that would be very helpful, 17 ARVs, TSTs ... stand for? 18 A. Armed response vehicles and tactical support team. 19 THE CHAIRMAN: Thank you very much. 20 MS BLACKWELL: Thank you, sir. 21 From what you have described, it was a natural 22 progression for you and something that was expected? 23 A. Yes. 24 Q. Right. 25 The second point I would like to return to is this.</p> <p style="text-align: center;">Page 6</p>
<p>1 We have established that whilst you were situated in 2 a training role, you still deployed operationally on 3 occasion? 4 A. Yes, that's correct. 5 Q. How often would that happen, generally speaking? 6 A. So the training team is also an operational team to 7 assist when required to support the teams in London. 8 Q. Yes. 9 A. I can't remember how many times that we deployed whilst 10 I was in a training role but we did deploy. I can't 11 remember how many, sorry. 12 Q. Right. That obviously wasn't your main role at that 13 time, so it would be on occasion? 14 A. On occasions. 15 Q. You cannot say anymore than that? 16 A. No. 17 Q. Thank you. 18 The third point is this. What was the reason for 19 you returning to operational policing from your training 20 role? 21 A. At the time there was a two-year rotational policy, so 22 you came off an operational role, went into a training 23 role for two years and then rotated back to 24 an operational role. 25 Q. So is that why we see that you took up a training role</p> <p style="text-align: center;">Page 7</p>	<p>1 between November 2013 and November 2015, at which point 2 you returned to the operational role? 3 A. That's correct. 4 Q. Finally, please, this question. Since returning to the 5 operational role in November 2015, what were the number 6 of deployments with which you were involved between you 7 returning in November 2015 and the date that this 8 inquiry is interested in, 11 December 2015? 9 A. Other than the week that we are talking about, there 10 were no -- as far as I am aware, there were no 11 operational deployments, it was only a three-week period 12 of time, I believe. 13 Q. Yes, so this operation, Operation Ankaa, was the only 14 operation that that you undertook following your return 15 to the role in November 2015? 16 A. From memory, yes. 17 Q. All right. 18 I would like to us look together, please, at 19 a document that the inquiry has heard described as 20 a blue card. 21 It is at IPC1076, please, Mr Coates. 22 You may refer to it as something else. Do you know 23 the document that I am referring to? 24 A. I do, yes. 25 Q. This seems to be the front cover or the front page of it</p> <p style="text-align: center;">Page 8</p>

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1 and we can see that for the inquiry's purposes it bears
 2 your cipher and it confirms that this document was
 3 issued on 10 April 2014.
 4 Can we go to the next page, please, and can we
 5 enlarge that?
 6 Thank you.
 7 I am afraid it is somewhat on a slant. Are you able
 8 to read that, W80?
 9 **A. I am, yes.**
 10 Q. All right. I was going to invite you to read it out,
 11 but I think I might do that and ask you some questions
 12 about it because it is not as clear as it might be.
 13 Before I do so, could you explain to the inquiry
 14 what this document is and where it was carried on your
 15 person, and in what circumstances?
 16 **A. So this blue card is a firearms authorisation card, that**
 17 **is carried by authorised firearms officers on their**
 18 **person. It allows them to draw firearms and ammunition**
 19 **and to carry them.**
 20 Q. What is the purpose of having this with you?
 21 It provides authorisation, doesn't it?
 22 **A. Yes.**
 23 Q. We will look in a moment to see that there are several
 24 stamps in relation to different types of weapons?
 25 **A. Yes.**

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1 or suspected offenders or of persons unlawfully at
 2 large. When making a determination as to whether the
 3 level of force used was lawful in any particular
 4 instance, the courts will take cognisance of the
 5 articles under the ECHR."
 6 Did you understand that, primarily, the final
 7 reference there was to article 2, the right to life?
 8 **A. Yes, sir.**
 9 Q. Second:
 10 "Circumstances when weapons may be fired: firearms
 11 are to be fired by AFOs in the course of their duty only
 12 when absolutely necessary, after conventional methods
 13 have been tried and failed, or must, from the nature of
 14 the circumstances, be unlikely to succeed if tried. It
 15 is strongly advised that warning shots are a dangerous
 16 option, as they may lead a subject or other officers to
 17 believe they are under fire or cause collateral injury."
 18 Did you understand that guidance?
 19 **A. Yes.**
 20 Q. "Oral warning: AFOs shall identify themselves as such
 21 and shall give an oral warning of their intent to use
 22 firearms ..."
 23 Clear warning, I am so sorry, "clear warning", I am
 24 afraid the type is not particularly clear at all:
 25 "... give a clear warning of their intent to use

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1 Q. But this part of the document, which sits at pages 2 and
 2 3, sets out certain pieces of guidance and legislation,
 3 doesn't it, around the use of firearms?
 4 **A. That's correct, as a reminder.**
 5 Q. Right. Thank you. Did you carry this on you during the
 6 course of every deployment?
 7 **A. Yes, I did.**
 8 Q. Right. Was that something which you chose to do, was it
 9 expected of you or were you ordered to do so?
 10 **A. It is expected of an authorised firearms officer to**
 11 **carry their blue card with them.**
 12 Q. As an experienced firearms officer, would you be in the
 13 habit of considering the guidance that is set out on
 14 these two pages before each deployment or is it
 15 something which is ingrained in your mind in any event?
 16 **A. Both, and we are also reminded of our powers as well at**
 17 **briefings.**
 18 Q. At briefings, we will see that in some of the
 19 transcripts of the briefings you attended on this
 20 deployment.
 21 We can see that the first reference is to section 3
 22 of the Criminal Law Act 1967, which says as follows:
 23 "A person may use such force as is reasonable in
 24 circumstances in the prevention of crime or in the
 25 effecting or assisting in the lawful arrest of offenders

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1 firearms, with sufficient time for the warnings to be
 2 observed, unless to do so would unduly place any person
 3 at a risk of death or serious harm or it would be
 4 clearly inappropriate or pointless in the circumstances
 5 of the incident."
 6 Did you understand that guidance?
 7 **A. Yes.**
 8 Q. Thank you.
 9 The guidance down the right-hand side of the page
 10 relates first of all to the authorisation card itself,
 11 and it relates to a requirement to ensure that your
 12 mandatory authorisation requirements are valid at all
 13 times.
 14 The second piece of guidance on the right-hand side
 15 relates to an annual report which states that that will
 16 be recorded by your own firearms OCU.
 17 Then, finally, relief from firearms duties at the
 18 bottom of page 3:
 19 "As an AFO you may relieve yourself from firearms
 20 duties at any time and for any reason by submitting
 21 a particular form and your authorisation card to one of
 22 your line managers."
 23 Did you understand those three pieces of guidance?
 24 **A. Yes, sir.**
 25 Q. All right.

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1 Can we now go to the next page, please, Mr Coates.
 2 Can we enlarge that sheet. Thank you.
 3 What we see throughout the rest of this card are
 4 a series of sections with either date stamps or dates
 5 written in, and we will move through it quite quickly,
 6 just to confirm that in relation to each of these areas,
 7 your authorisation was up to date.
 8 **A. Yes.**
 9 Q. We can see on this page, annual audiometry assessment
 10 and annual eye tests.
 11 Next page, please.
 12 Job related fitness test, annual competency and
 13 weapons and tactics section.
 14 Next page, please.
 15 Then we come to the part of the authorisation card
 16 that deals with the various weapons. Can you describe
 17 to us, please, as we go through these pages, which
 18 weapons each of these sections relate to?
 19 **A. Yes.**
 20 Q. Thank you.
 21 **A. So the Glock is the pistol.**
 22 Q. Yes.
 23 **A. And it is our secondary weapon, which we carry in**
 24 **a holster.**
 25 Q. Yes.

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1 **a building, and there is a shortened version of the**
 2 **shotgun, which we predominantly use for an entry gun for**
 3 **either taking hinges off doors or deflating tyres.**
 4 Q. Yes.
 5 **A. The G3K is a 762 calibre weapon, it is a larger weapon,**
 6 **a rifle for want of a better word.**
 7 Q. Thank you. Then is that the back cover of the
 8 authorisation card?
 9 **A. That's correct.**
 10 Q. Thank you. We can take that down, please.
 11 THE CHAIRMAN: Can you just tell us, before we do, what the
 12 dates symbolise in that document. You don't need to go
 13 through them all.
 14 **A. The dates, the first date would be the date that**
 15 **I reclassified and then the second date is the date that**
 16 **that expires.**
 17 THE CHAIRMAN: When you say reclassified, what do you mean?
 18 **A. So fired the weapon and basically taken a test to make**
 19 **sure that I am still accurate with that weapon.**
 20 THE CHAIRMAN: Right. Could we just go back, please.
 21 Yes, thank you. Sorry, Ms Blackwell.
 22 MS BLACKWELL: Not at all, sorry, sir.
 23 Do we see on page 12 in relation to the SIG/MCX,
 24 that the final dates we can make out on that card are
 25 7 December 2015 to 30 June 2016?

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1 **A. The MP5 and PDW are carbies that we have access to in**
 2 **our armoury. Short rifles.**
 3 Q. Thank you.
 4 Next page, please.
 5 **A. So the Glock 19 is still a pistol, but it is -- we have**
 6 **two different sizes in our armoury, depending on the**
 7 **role that we are performing.**
 8 **The G36 is another carbine rifle.**
 9 Q. Yes, thank you.
 10 **A. The SIG/MCX is a carbine rifle.**
 11 Q. And that was the firearm that you discharged during the
 12 course of this operation?
 13 **A. That's correct.**
 14 Q. Thank you.
 15 **A. The Taser is a less-lethal option that we carry,**
 16 **an electronic stun gun, for want of a better word.**
 17 Q. Thank you.
 18 Next page, please.
 19 **A. The baton gun is again another less-lethal option, that**
 20 **fires a rubber round and we have a different point of**
 21 **aim when using the baton gun. It is a less-lethal**
 22 **option.**
 23 **The shotgun is -- there are two variants of the**
 24 **shotgun, there is the long shotgun, which we can use for**
 25 **dispatching animals and also for dispersing CS into**

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1 **A. That's correct.**
 2 Q. What does that tell us about your authorisation for that
 3 weapon?
 4 **A. That tells us that I was in date and authorised to use**
 5 **that weapon.**
 6 Q. Did you perform any sort of test or training on or
 7 around 7 December in order to authorise yourself to use
 8 that weapon?
 9 **A. Yes, yes, I would have gone up on to the range and taken**
 10 **a classification shoot.**
 11 Q. In relation to 7 December, how proximate would that
 12 shoot have been to that date?
 13 **A. That would have been on that date.**
 14 Q. On 7 December?
 15 **A. Yes.**
 16 THE CHAIRMAN: The expiry, for instance, for the SIG is
 17 about -- it could be six months, it could be seven
 18 months?
 19 **A. Six months generally, sir.**
 20 THE CHAIRMAN: Why would in some cases for example it be
 21 longer? It doesn't sort of have a fixed expiry date,
 22 does it? I mean 19 November 2014 to 30 May, 24 August
 23 to 29 February, do you understand? It is not
 24 an automatic expiry, it is around about six or in some
 25 cases seven months.

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<p>1 A. It is around about, sir, but we generally make sure that 2 we classified before the end of that date so we remained 3 in date. 4 MS BLACKWELL: If you look, sir, at the second dates on each 5 of the lines, they are at the end of each of those 6 months, so it looks as if the date is rounded to the end 7 of the month. 8 THE CHAIRMAN: It is the end of the sixth month after issue. 9 MS BLACKWELL: Yes, quite so. 10 THE CHAIRMAN: In that case, and as far as the Taser is 11 concerned -- 12 A. The Taser is 12 months, sorry, sir. 13 THE CHAIRMAN: It is a bit longer actually in some cases, 14 but there is not a 31 June and there is not 15 a 31 September. That was obviously an error. 16 Yes. 17 MS BLACKWELL: Thank you, could we take that down, please. 18 THE CHAIRMAN: Thank you. 19 MS BLACKWELL: I am going to turn now to ask you some 20 questions about Operation Ankaa itself. We know from 21 the witness statements that you have prepared that you 22 first became aware of the operation on Sunday, 23 6 December. 24 A. That's correct, sir. 25 Q. You describe in your statement that you first became</p> <p style="text-align: center;">Page 17</p>	<p>1 aware of the operation when volunteers were requested to 2 attend Leman Street to help to plan and recce 3 an operation. 4 A. That's correct, sir. 5 Q. Had you heard any information about the operation, be it 6 by rumour or any sort of mention of it being in the 7 process of being planned prior to 6 December? 8 A. Not that I am aware of. 9 Q. All right. 10 Who was it that first brought the operation to your 11 attention? 12 A. S105. 13 Q. Was he acting as your sergeant at the time? 14 A. Yes, he was. 15 Q. Had you much experience of him as an officer? 16 A. I had, whilst I was an instructor, I -- I was 17 an instructor on his CTSFO course, so I knew of S105. 18 Q. Right. Prior to you returning to operational duties in 19 November 2015, had you worked with him on operational 20 duties? 21 A. I had worked once with his team, when they asked for 22 people to help out, and, as I have said, when we are 23 instructors, we also sometimes have to backfill with 24 an operational team. So I have worked with him and his 25 team on one occasion prior to November. I think it was</p> <p style="text-align: center;">Page 18</p>
<p>1 in September 2015. 2 Q. Right. 3 You and he had a telephone conversation; is that 4 right? 5 A. Yes. 6 Q. Yes. During which you were invited to attend Leman 7 Street? 8 A. That's correct. 9 Q. You did attend Leman Street. How soon after the 10 conversation did you make your way to Leman Street? 11 A. More or less straight away. 12 Q. And how long did that take you? 13 A. An hour and a half maybe to get into Leman Street. 14 Q. Right. 15 We know that once you got there, you were given 16 a briefing by the officer known by the cipher V64, who 17 is also, I think, Detective Sergeant Stewart? 18 A. I don't think he is a detective. 19 Q. Sergeant Stewart? 20 A. Sergeant Stewart. 21 Q. Thank you. 22 Who else was present during that briefing, are you 23 able to remember? 24 A. K78 -- sir -- and maybe one other officer from Darren's 25 team, sorry, from V64's team.</p> <p style="text-align: center;">Page 19</p>	<p>1 Q. Did you have any experience of K78, did you know him? 2 A. Yes. 3 Q. Had you worked with him before? 4 A. We -- I don't think I had been on the same team as him, 5 but I knew him and I probably had worked with him 6 before. 7 Q. So Sergeant Stewart, yourself, K78 and who else? 8 A. I said there may have been one other officer from Orange 9 Team. 10 Q. From Mr Stewart's team? 11 A. Yes. 12 Q. But a maximum of four? 13 A. From memory, yes, sir. 14 Q. It was Mr Stewart that was giving the briefing? 15 A. That's correct. 16 Q. Let's look together, please, behind tab 4 of our hard 17 copy bundle, because if we look at the bottom of page 1, 18 we can see your description of the information that was 19 given to you during the course of this briefing. This 20 is not a memory test, so I am going to read out what you 21 provided to the IPCC on 22 December 2015 when you made 22 this statement. 23 You said: 24 "I was given an outline of the operation. This 25 included information that there was a stolen Audi</p> <p style="text-align: center;">Page 20</p>

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<p>1 vehicle involved, the location of that vehicle near Wood 2 Green Crown Court, the identity of the individuals who 3 it was intended to break free, the offences that these 4 individuals were being taken to Wood Green Crown Court 5 to be sentenced for and the OCN suspects likely to be 6 involved in the operation. This included information 7 that the prisoner or prisoners who were to be broken out 8 of the prison van were attending the Crown Court to be 9 sentenced for offences relating to being in possession 10 of a loaded machine pistol and a pistol when stopped by 11 ARV officers."</p> <p>12 Right, now, does that accurately reflect the 13 information that you were given during the course of 14 that very first briefing?</p> <p>15 A. Yes.</p> <p>16 Q. Was that briefing accompanied by any additional 17 information, such as a PowerPoint?</p> <p>18 A. No.</p> <p>19 No, it would have been just a verbal briefing.</p> <p>20 Q. I am going to describe it as nothing more sophisticated 21 than a meeting between the four of you, during which 22 Mr Stewart provided you with the information that we 23 have just set out?</p> <p>24 A. That's correct.</p> <p>25 Q. All right.</p> <p style="text-align: center;">Page 21</p>	<p>1 Were you provided with any photographs or were any 2 photographs of the conspirators shown to you during the 3 course of that briefing?</p> <p>4 A. I don't think so at that time.</p> <p>5 Q. Was any indication given to you as to the nature of the 6 intelligence with which you were being informed?</p> <p>7 A. Sorry, could you just --</p> <p>8 Q. Was anything told to you about the nature of the 9 intelligence, where it had come from?</p> <p>10 A. Not at that early stage -- I don't -- no, sorry, I think 11 at that stage we may have been told that one of the 12 people that was going to be broken out had access to 13 a mobile phone --</p> <p>14 Q. Right.</p> <p>15 A. -- and that they were communicating from within prison 16 to people outside.</p> <p>17 Q. Were you told that there had been an aborted attempt to 18 spring Izzet Eren from the prison van on 29 October?</p> <p>19 A. I can't remember, sorry.</p> <p>20 Q. Did you come to know that information at some point 21 during this operation?</p> <p>22 A. Yes.</p> <p>23 Q. Right. But you cannot say whether or not it was at that 24 early stage?</p> <p>25 A. I can't, sorry.</p> <p style="text-align: center;">Page 22</p>
<p>1 Q. All right, thank you.</p> <p>2 Following the briefing, were you asked to perform 3 a reconnaissance or a recce at Wood Green Crown Court?</p> <p>4 A. Yes. Myself and K78.</p> <p>5 Q. Who tasked you with doing that?</p> <p>6 A. From memory, either V64 -- I think it was V64.</p> <p>7 Q. Do you have a recollection of performing that recce?</p> <p>8 A. Yes, I do.</p> <p>9 Q. Were you told at the time that the route to be taken 10 from Wormwood Scrubs to Wood Green Crown Court on 11 11 December was not known at that time?</p> <p>12 A. That's correct.</p> <p>13 Q. Were you also told that you were to keep away from the 14 immediate surroundings of the Audi vehicle, lest you 15 should raise suspicions with any of the conspirators?</p> <p>16 A. That's correct. And I think the Audi was positioned in 17 Eastern Road.</p> <p>18 Q. Yes, it was, in a car park.</p> <p>19 A. Yes, that's right.</p> <p>20 Q. What form did your recce that day take?</p> <p>21 A. So we were just familiarising ourselves with the area 22 around Wood Green Crown Court, around the area of 23 Eastern Road but obviously not going into Eastern Road, 24 just -- and some locations of maybe some holding areas 25 where our covert vehicles could hold up if we had to for</p> <p style="text-align: center;">Page 23</p>	<p>1 any length of time.</p> <p>2 Q. Were you familiar with this area?</p> <p>3 A. I have policed it but not -- I haven't never -- I have 4 never been posted to that area. When on the armed 5 response vehicles we did patrol that area quite a lot.</p> <p>6 Q. Right, and did K78 have a good knowledge of the area?</p> <p>7 A. I don't think so, no. He would have been aware of the 8 area, but I don't think he would have -- no.</p> <p>9 Q. So neither of you was taking the lead in terms of 10 identifying particular places of interest?</p> <p>11 A. No.</p> <p>12 Q. Who was driving?</p> <p>13 A. I can't remember, sorry.</p> <p>14 Q. All right. How long did the recce take?</p> <p>15 A. A couple of hours? Maybe. I can't remember, sorry.</p> <p>16 Q. Did you make any notes during the course of your 17 journey?</p> <p>18 A. We would have marked areas on a map and had maps open in 19 front of us as we were driving around.</p> <p>20 Q. We are going to come in a moment to look at some of the 21 maps that you prepared during the course of your 22 involvement in this operation. From what you have said, 23 it looks as if the beginnings of your involvement in 24 preparing maps was that day, on 6 December, if you 25 were -- had maps available to you when you were</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 travelling around the area, is that right?</p> <p>2 A. That's correct.</p> <p>3 Q. Thank you.</p> <p>4 Let's move then to the next day, Monday, 7 December.</p> <p>5 Were you told on that day that the Audi vehicle had been</p> <p>6 repositioned in the Eastern Road car park?</p> <p>7 A. Yes.</p> <p>8 Q. Were you also told that the brother of the intended</p> <p>9 escape subject had been involved in moving it?</p> <p>10 A. Yes, that's correct.</p> <p>11 Q. We now know that that is a reference to Ozcan Eren, who</p> <p>12 is in fact the cousin, not the brother, of Izzet Eren,</p> <p>13 but at the time you were told that it was the brother?</p> <p>14 A. That's correct.</p> <p>15 Q. Who provided you with those pieces of information?</p> <p>16 A. I am unsure. It may have been S105 and it may have been</p> <p>17 V64. I am unsure, sorry.</p> <p>18 Q. Are you able to help the inquiry with the circumstances</p> <p>19 in which you were provided with that information, was it</p> <p>20 a one on one or were you in a meeting, and if so where</p> <p>21 were you?</p> <p>22 A. I am pretty sure we would have been at Leman Street,</p> <p>23 which is our base.</p> <p>24 Q. Yes.</p> <p>25 A. And I am not sure if anyone else was around at that</p> <p style="text-align: center;">Page 25</p>	<p>1 time.</p> <p>2 Sorry.</p> <p>3 Q. No need to apologise.</p> <p>4 Were you aware of other officers being briefed, in</p> <p>5 other words was the team being assembled in your view,</p> <p>6 or was it still sparse, did it still only amount to four</p> <p>7 people?</p> <p>8 A. I think at this stage, because it was a confidential</p> <p>9 operation, there were still only a few of us that knew</p> <p>10 and wanted to keep it within that circle at that stage.</p> <p>11 Q. Did you have any knowledge of the level of experience</p> <p>12 that the others who you have identified had in firearms</p> <p>13 operations? What I am getting at is: were you the most</p> <p>14 experienced?</p> <p>15 A. No. I wasn't the -- my other team, K78 is more</p> <p>16 experienced than I am, for instance. So there were</p> <p>17 other experienced officers there.</p> <p>18 Q. Do you have any recollection of whether or not K78 was</p> <p>19 briefed on this day at the same time as you?</p> <p>20 A. Sorry, no.</p> <p>21 Q. All right.</p> <p>22 We know that on Monday, 7 December, you started to</p> <p>23 prepare the maps to which we have referred, and you did</p> <p>24 that for two reasons.</p> <p>25 Firstly, in order to provide a series of maps and</p> <p style="text-align: center;">Page 26</p>
<p>1 plans in hard copy form to each of the teams, to each of</p> <p>2 the vehicles that were going to be deployed on</p> <p>3 11 December.</p> <p>4 Also you had in mind using those maps and plans,</p> <p>5 during the course of any briefing on the morning of the</p> <p>6 deployment, which you would be involved in. Is that</p> <p>7 right?</p> <p>8 A. That's correct.</p> <p>9 Q. Right.</p> <p>10 Let's take a look, please, at the series of maps and</p> <p>11 plans that you prepared and we can see them at MPS3438,</p> <p>12 please.</p> <p>13 That is the first page. Who is or was the Red Team?</p> <p>14 A. My team, my operational CTSFO team.</p> <p>15 Q. Right. When you prepared these documents, did you have</p> <p>16 an indication as to which part of the operation you</p> <p>17 would be involved in?</p> <p>18 A. Yes. Yes.</p> <p>19 Q. What was that?</p> <p>20 A. The strand of the operation that was going to deal with</p> <p>21 the stolen Audi motor vehicle.</p> <p>22 Q. Right.</p> <p>23 Did you also become aware that there were two other</p> <p>24 strands to the operation, an armed surveillance -- or</p> <p>25 armed surveillance with a MASTS support on the prison</p> <p style="text-align: center;">Page 27</p>	<p>1 van and unarmed surveillance, without that support, on</p> <p>2 the individual that we have identified as Ozcan Eren?</p> <p>3 A. I am sure that I knew about the operation to provide</p> <p>4 surveillance on the prison van.</p> <p>5 Q. Yes.</p> <p>6 A. At that stage, I am not sure if I knew about the unarmed</p> <p>7 surveillance on Ozcan Eren.</p> <p>8 Q. Had that information in terms of how the teams were</p> <p>9 going to be split come to you during the original</p> <p>10 briefing on 6 December?</p> <p>11 A. Yes, that's correct.</p> <p>12 Q. Thank you.</p> <p>13 Can we go to the next page, please.</p> <p>14 Could you provide, please, an explanation as to each</p> <p>15 of these plans as we go through them, why you prepared</p> <p>16 them and what the markings on them mean.</p> <p>17 A. So this is what we would call an overview map, and in</p> <p>18 general terms this just has the location of Wormwood</p> <p>19 Scrubs, which is the red dot in the bottom left corner</p> <p>20 of the map.</p> <p>21 Q. Yes.</p> <p>22 A. And then in relation to that, the area of Wood Green</p> <p>23 Crown Court. Which is the other red dot towards the</p> <p>24 right-hand side of the map.</p> <p>25 Q. That is at the top right hand side of the page?</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

1 **A. Yes.**
 2 Q. Thank you.
 3 **A. That is just for an awareness of where the two places**
 4 **are within north London.**
 5 Q. And the distance between them?
 6 **A. That's correct.**
 7 Q. Thank you.
 8 **A. And the major routes as well.**
 9 Q. Right, because of course, whilst you were preparing
 10 this, you still did not know the precise route that the
 11 van would take from one to the other?
 12 **A. That's correct.**
 13 Q. Thank you.
 14 Can we go to the next page, please.
 15 This looks as if it is a copy of the A to Z or some
 16 other similar map, and it has a series of I think two
 17 blue dots and a -- two blue circles and a red circle.
 18 Just familiarising yourself with that, can you indicate,
 19 please, what those markings mean?
 20 **A. The red dot in the centre is Eastern Road, the location**
 21 **of the Audi at that time.**
 22 **The blue dot underneath the red dot, I think, is the**
 23 **location of the patrol base that was a possible holding**
 24 **area for us. Quicksilver.**
 25 Q. Quicksilver, yes.

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1 **The red dot is Wood Green Crown Court, in Lordship**
 2 **Lane.**
 3 Q. Yes.
 4 **A. And the blue dot above that, by the New River Sports**
 5 **Centre, is again another car park that I had identified**
 6 **as a possible holding area for our four vehicles.**
 7 Q. Again, these areas have been identified by you and K78
 8 on your recent recce of the area?
 9 **A. That's correct, we would have -- sorry.**
 10 Q. Thank you. Carry on, I interrupted you.
 11 **A. We would have driven around them and just made sure that**
 12 **we could -- the whole team could get into them, if**
 13 **required.**
 14 Q. Right.
 15 That looks as if it is a closer, more zoomed-in
 16 version of the page before?
 17 **A. It is.**
 18 Q. Thank you.
 19 Next page, please. What is that?
 20 **A. This is just another image from our mapping system that**
 21 **we use, it is not from an A to Z. Just showing a route**
 22 **from Lordship Lane to the entrance, or the rear**
 23 **entrance, to the Crown Court.**
 24 Q. Were you aware of the route that the prison van would
 25 have to take once it exited Lordship Lane, in order to

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1 **A. And the dot in the top corner is a car park, I think,**
 2 **from memory, behind a tile shop which is, again, another**
 3 **just possible holding area for the team, just the other**
 4 **side of the North Circular Road.**
 5 Q. Was this prepared following your recce on 7 December?
 6 **A. Yes.**
 7 Q. Right.
 8 Next page, please.
 9 We can see four blue circles and one red circle now.
 10 **A. That's correct.**
 11 **So the red circle to the left is Eastern Road again.**
 12 **So all I have done here is just brought the map closer**
 13 **in to show the Wood Green area.**
 14 Q. Yes.
 15 **A. The blue dot -- in Nightingale is I think Wood Green**
 16 **police station, from memory.**
 17 **Again, Quicksilver Patrol Base is the blue dot or**
 18 **circle to the south of that.**
 19 Q. Next to the primary school?
 20 **A. Yes, that's correct.**
 21 Q. Yes.
 22 **A. In Lordship Lane you have another blue dot, which is**
 23 **a car park, I believe behind the bingo hall that we had**
 24 **identified as another possible holding point for the**
 25 **team.**

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1 get into the court?
 2 **A. From memory, I think there might have been a one-way**
 3 **system, but I can't be sure.**
 4 Q. All right.
 5 **A. That is maybe why I have indicated in this map,**
 6 **a possible route.**
 7 Q. Thank you.
 8 Next page, please. That is an aerial photograph
 9 depicting the same place, isn't it?
 10 **A. That's correct, yes.**
 11 Q. The Crown Court that we can see on the right-hand side
 12 of the page and moving to the left-hand side of the
 13 page.
 14 Thank you. Obviously that is a photograph outside
 15 the Crown Court?
 16 **A. It's just from Street View.**
 17 Q. Yes. Now, what is this?
 18 **A. Again, from Street View, this is the entrance for Serco**
 19 **vehicles into the rear of the Crown Court, and I think**
 20 **it is in Winkfield Road.**
 21 Q. Thank you.
 22 Did you spend any time waiting at this point during
 23 the course of your recce to see, for instance, how long
 24 it took for the gate to move open and close?
 25 **A. No, this was a Sunday, so the court, I don't think,**

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<p>1 would have been sitting on a Sunday.</p> <p>2 Q. No, of course.</p> <p>3 A. So no. And also we didn't -- we don't really want to</p> <p>4 hang around, because at this stage it is still a covert</p> <p>5 operation and we don't want to stand out.</p> <p>6 Q. All right.</p> <p>7 Did you as a result of seeing this on the Sunday,</p> <p>8 make any further enquiries about the manner in which</p> <p>9 prison vans were allowed in and out of the complex?</p> <p>10 A. From -- again, from memory, I seem to recall</p> <p>11 a conversation about prison vans having to queue up at</p> <p>12 this gate to get through it, so therefore it probably</p> <p>13 would have opened fairly slowly.</p> <p>14 Q. Right.</p> <p>15 Did you also know whether or not the vehicles, the</p> <p>16 four vehicles that we can see parked on the right-hand</p> <p>17 side of the gates, were likely to be there during the</p> <p>18 course of the working week, because of course, this</p> <p>19 being a Sunday, they may have been parked there,</p> <p>20 mightn't they, by residents?</p> <p>21 A. Again, I can't remember, sorry.</p> <p>22 Q. All right.</p> <p>23 Can we go to the next page, please.</p> <p>24 That looks as if it is a repeat of what we have just</p> <p>25 seen in terms of the A to Z map.</p> <p style="text-align: center;">Page 33</p>	<p>1 Next page, please.</p> <p>2 What does that show?</p> <p>3 A. So, again, a different map but showing the same thing:</p> <p>4 so the green dot is Wood Green Crown Court; the blue dot</p> <p>5 at the bottom is just showing the road name where</p> <p>6 Quicksilver Patrol Base is; Wood Green police station in</p> <p>7 Nightingale road; Eastern Road; and then the car park,</p> <p>8 the other side of the North Circular Road, is the other</p> <p>9 blue dot.</p> <p>10 Q. Thank you.</p> <p>11 Next page, please.</p> <p>12 Is that an aerial view of Eastern Road?</p> <p>13 A. It is, yes.</p> <p>14 Q. Yes. That was presumably to indicate the location of</p> <p>15 the Audi vehicle?</p> <p>16 A. At that time, yes.</p> <p>17 Q. Thank you.</p> <p>18 Next.</p> <p>19 A. The entrance to Eastern Road from Bounds Green Road.</p> <p>20 Again from Street View. We would not have hung around</p> <p>21 there for any length of time.</p> <p>22 Q. Was the car park in which the Audi had been stored at</p> <p>23 the bottom of the road that we see?</p> <p>24 A. Yes.</p> <p>25 Q. Going towards what appears to be several trees at the</p> <p style="text-align: center;">Page 34</p>
<p>1 bottom of the road?</p> <p>2 A. That's right, I believe there is a metal gate there,</p> <p>3 which leads into the small estate where the car park</p> <p>4 was.</p> <p>5 Q. Thank you.</p> <p>6 Next, please. Then we can see it, I think, as you</p> <p>7 describe?</p> <p>8 A. That's correct.</p> <p>9 Q. Thank you.</p> <p>10 Next page, please.</p> <p>11 That is another aerial photograph of the same --</p> <p>12 A. That's correct.</p> <p>13 Q. Does that red rectangle denote the position that the car</p> <p>14 was?</p> <p>15 A. At that time, yes.</p> <p>16 Q. Thank you.</p> <p>17 A. That is just another satellite image showing an aerial</p> <p>18 view of the North Circular Road junction with Bounds</p> <p>19 Green Road. Although we didn't know which route they</p> <p>20 would come, at that time we thought that they might come</p> <p>21 along the North Circular Road.</p> <p>22 Q. Next page, please.</p> <p>23 I think that is the end of the bundle, is that</p> <p>24 right? Thank you.</p> <p>25 Just before we leave this, I would like to ask you</p> <p style="text-align: center;">Page 35</p>	<p>1 a couple of supplemental questions.</p> <p>2 The first is this, the photographs that we have seen</p> <p>3 of the Crown Court and the junction of Bounds Green Road</p> <p>4 and Eastern Road, those were not taken during your</p> <p>5 recce, were they? Those, as you have explained, were</p> <p>6 from the Street View app or facility that you can use on</p> <p>7 your computer?</p> <p>8 A. That's correct.</p> <p>9 Q. Secondly, we know from your witness statements that you</p> <p>10 began to prepare this bundle on Monday, 7 December. Did</p> <p>11 you complete the whole bundle on that day?</p> <p>12 A. Probably. Probably completed on that day, yes.</p> <p>13 Q. Right. Thank you.</p> <p>14 Tuesday, 8 December. You were involved in the TSU</p> <p>15 deployment to fit an audio probe in the audio?</p> <p>16 A. Yes, sir.</p> <p>17 Q. We know that there were two briefings relating to that</p> <p>18 deployment. One at 6.00 am on the morning of Tuesday,</p> <p>19 8 December, and another one at 8.20 am. You attended</p> <p>20 both of those briefings.</p> <p>21 A. Yes, sir.</p> <p>22 Q. Who had identified you as one of the officers to be</p> <p>23 involved in the deployment that day?</p> <p>24 A. From memory, it probably would have been V64 or S105</p> <p>25 that asked me to help out.</p> <p style="text-align: center;">Page 36</p>

9 (Pages 33 to 36)

1 Q. Right. Were you asked to attend both of the briefings?
 2 A. Yes.
 3 Q. Let's deal firstly then with the 6.00 am briefing. Was
 4 that recorded?
 5 A. **Not that I am aware of.**
 6 Q. Can you tell us where that took place and how many
 7 officers were present?
 8 A. **It would have taken place at Leman Street police**
 9 **station, myself and K78 were assisting V64's team, so**
 10 **the majority of the people there would have been from**
 11 **a different team, and it was just myself and K78 from my**
 12 **team and I think from memory nine officers, I would**
 13 **think.**
 14 Q. What was the purpose of the 6.00 am briefing?
 15 A. **It was a tactical overview briefing, just giving us some**
 16 **background information regarding the operation --**
 17 Q. Right.
 18 A. **-- and our postings.**
 19 Q. By "postings", you mean what?
 20 A. **Our positions within the operation, so where we were**
 21 **going to be.**
 22 Q. Described by you as a tactical briefing, that was
 23 an important aspect in terms of learning what you were
 24 expected to do during the course of the deployment?
 25 A. **It is an important briefing, yes. Yes.**

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1 A. **Quicksilver Patrol Base, I think, from memory.**
 2 Q. Right. That was recorded, wasn't it?
 3 A. Yes.
 4 Q. The inquiry has been provided with a transcript of that
 5 recording, which I think you have also had the
 6 opportunity of considering.
 7 A. Yes.
 8 Q. That briefing was presented by Steve Alexander from the
 9 TSU and V64, Mr Stewart, do you remember that?
 10 A. Yes.
 11 Q. All right.
 12 I would like to look for a moment, please, at
 13 an email that was sent to you on 8 December. We can see
 14 it at MPS3441.
 15 Can we go to the next page, please.
 16 If we look at the bottom of the page first, we can
 17 see that the first email in this train is from FE16, the
 18 inquiry knows to be Mr Williams, sent to Mr Turner. So
 19 that is the TFC sending the document to the SFC in the
 20 operation and copying in Keely Smith, Andy Whitewood,
 21 Brendan Gilmour and S48, who the inquiry knows is the
 22 TAC adviser?
 23 A. Yes.
 24 Q. Moving up the page, we can then see that S48, at 11.35
 25 on 8 December sends the email to V64, to V118, to S105,

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1 Q. Do you know why it was thought necessary to have two
 2 briefings that morning, rather than simply one?
 3 A. **So that -- we always have a tactical briefing at Leman**
 4 **Street before we move on to what we call a main**
 5 **briefing, which is the briefing for all of the people**
 6 **concerned in the operation.**
 7 Q. The briefing at Leman Street was just for the firearms
 8 officers?
 9 A. **That's correct.**
 10 Q. The later briefing at 8.20 was for the firearms officers
 11 together with any other officer that was to be involved?
 12 A. **The surveillance team and the TSU.**
 13 Q. Right.
 14 The information that you describe I think as
 15 background and information relating to the operation
 16 itself, that was given at the 6.00 am briefing, was
 17 already known to you.
 18 A. **Yes, that's correct.**
 19 Q. Was there anything in addition to what you had already
 20 heard on 6 December provided to you on 8 December,
 21 during that first tactical briefing?
 22 A. **I don't think there was any new information at that**
 23 **stage.**
 24 Q. You then moved to the 8.20 briefing, which took place
 25 where?

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1 Brian Elliot and HA35. Then, at the top of the page, we
 2 can see that at 1713 hours on 8 December S105 sends the
 3 document to you and to K78.
 4 Looking at the time this email was sent to you, are
 5 you able to tell the inquiry whether this was before or
 6 after the deployment on 8 December?
 7 A. **Sorry ...**
 8 Q. It is 17.13, so it's 5.15 in the afternoon.
 9 A. **On the 8th, so this would have been after the**
 10 **deployment.**
 11 Q. Right.
 12 Do you remember receiving this email?
 13 A. **Yes, I do.**
 14 Q. Let's scroll down the page, please. And again. And
 15 again.
 16 Pause there. This email contained a series of
 17 individual intelligence assessments, didn't it, for
 18 Izzet Eren, Ozcan Eren, Sinan Ozger and others, together
 19 with an intelligence table?
 20 A. **That's correct.**
 21 Q. Do you remember receiving it?
 22 A. **Yes.**
 23 Q. This would have been, I am going to suggest, the first
 24 of several occasions when you were provided with sight
 25 of this document --

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<p>1 A. Yes.</p> <p>2 Q. -- between 8 December and 11 December?</p> <p>3 A. That's correct.</p> <p>4 Q. Right. Thank you. Could we go to the next page,</p> <p>5 please.</p> <p>6 I am interested just to ask you some questions about</p> <p>7 the table rather than the individual pieces of</p> <p>8 intelligence. So could we scroll down until we reach</p> <p>9 the table, please.</p> <p>10 There we are.</p> <p>11 You may want to -- you might not have to put your</p> <p>12 glasses on. Thank you, Mr Coates.</p> <p>13 Describe to us, please, from your understanding, the</p> <p>14 contents of this table and how it was provided to you</p> <p>15 for your assistance?</p> <p>16 A. It is a history of the Tottenham Turks and the Hackney</p> <p>17 Turks, and the sort of gang rivalry that has gone on</p> <p>18 between the two of them and in particular the sort of</p> <p>19 what has happened and obviously in red any weapons that</p> <p>20 have been identified.</p> <p>21 Q. Right.</p> <p>22 Receiving this as we have established on the</p> <p>23 afternoon of 8 December, was this the first time that</p> <p>24 you had seen this table?</p> <p>25 A. Yes, it would have been.</p> <p style="text-align: center;">Page 41</p>	<p>1 Q. Did you have any knowledge of the Tottenham Turks beyond</p> <p>2 Operation Ankaa?</p> <p>3 A. Yes, I had been -- both on the armed response vehicles</p> <p>4 and tactical support teams I had been involved in both</p> <p>5 spontaneous and pre-planned operations in north London.</p> <p>6 Q. Right, involving this organised crime network?</p> <p>7 A. Yes.</p> <p>8 Q. Right.</p> <p>9 This information, historical as it was, some of this</p> <p>10 information would have been already familiar to you?</p> <p>11 A. I was aware of the two gangs, yes.</p> <p>12 Q. Right. Had you received similar schedules to this on</p> <p>13 previous deployments involving the Tottenham Turks OCN?</p> <p>14 A. I am unsure if I -- if I have actually seen this table</p> <p>15 before, or a table like this before.</p> <p>16 Q. But, as I have already said, some of this information</p> <p>17 would have been known to you prior to you receiving this</p> <p>18 table?</p> <p>19 A. Yes.</p> <p>20 Q. All right.</p> <p>21 Could we go to the next page, please.</p> <p>22 I am looking at the left-hand column, not the far</p> <p>23 left-hand column which denotes the item numbers but the</p> <p>24 next column in, which denotes the date. This</p> <p>25 information was of some age by the time you were</p> <p style="text-align: center;">Page 42</p>
<p>1 receiving it in December 2015.</p> <p>2 A. That's correct, sir.</p> <p>3 Q. Could we go to the next page, please.</p> <p>4 Still at number 10, we are in 2009. We can see</p> <p>5 there that there was an incident at Enfield Snooker</p> <p>6 Club, where three unidentified black males opened fire</p> <p>7 on the premises before fleeing in a Ford Focus later</p> <p>8 found burnt out. We can see a series of weapons thought</p> <p>9 to have been utilised during the course of that</p> <p>10 incident.</p> <p>11 Then finally, towards the right-hand side, "Inside</p> <p>12 the burnt out car were documents in the name of</p> <p>13 Izzet Eren and he and Oktay Erbasli were arrested but</p> <p>14 not charged."</p> <p>15 Can we move through the schedule, please. Is it</p> <p>16 possible to scroll down? There we are, still in 2009,</p> <p>17 and again, please.</p> <p>18 Again, is that the end of the schedule?</p> <p>19 Can we go to the end, please, we have moved into</p> <p>20 2010, 2011, 2012. Thank you.</p> <p>21 So the most recent item there, the most recent event</p> <p>22 had taken place in 2012. In fact in December 2012?</p> <p>23 A. Yes. Yes, sir.</p> <p>24 Q. All right.</p> <p>25 Did you find that schedule of any use to you, given</p> <p style="text-align: center;">Page 43</p>	<p>1 that you had a knowledge of the Tottenham Turks and</p> <p>2 their use of weaponry?</p> <p>3 A. Yes, it would have been useful for me to have seen this.</p> <p>4 Q. How? How so?</p> <p>5 A. It is just more information regarding the people who we</p> <p>6 may be dealing with.</p> <p>7 Q. The capacity of the gang --</p> <p>8 A. That's correct.</p> <p>9 Q. -- to obtain and use firearms?</p> <p>10 A. That's correct.</p> <p>11 Q. Thank you, we can take that down now.</p> <p>12 You say in your witness statement that you cannot be</p> <p>13 certain precisely when, but some time on Tuesday,</p> <p>14 8 December you were given information that the suspect</p> <p>15 in custody, so that is Izzet Eren, did not want boys on</p> <p>16 the job, and wanted experienced people.</p> <p>17 A. Yes. That's correct.</p> <p>18 Q. The reason that I am confident that you have seen the</p> <p>19 transcript for the 8.20 briefing is you have had the</p> <p>20 opportunity of checking whether that information is</p> <p>21 contained within that transcript and it isn't there, is</p> <p>22 it?</p> <p>23 A. No, it is not.</p> <p>24 Q. Doing the best you can, are you able to establish at</p> <p>25 what point and in what circumstances you came to be told</p> <p style="text-align: center;">Page 44</p>

11 (Pages 41 to 44)

1 that information on 8 December?
 2 **A. No.**
 3 **All I can say is that it wasn't on the recorded**
 4 **briefing. I don't know at what stage -- I can't**
 5 **remember at what stage I was given that piece of**
 6 **information.**
 7 Q. Were you involved in any other briefing that day?
 8 **A. No.**
 9 Q. Right. Do you think it may have come to you during the
 10 course of the earlier briefing at 6.00 am?
 11 **A. I can't remember, sorry. I really can't.**
 12 Q. Do you know if you were in anybody else's company when
 13 you were told that information?
 14 **A. I can't remember, sorry.**
 15 Q. Or who gave it to you, who provided the information?
 16 **A. No, it may have been V64, S105, I couldn't be sure,**
 17 **sorry.**
 18 Q. When you were given that information, did you seek any
 19 further information about the source of that
 20 intelligence or the grading that it may have been given
 21 or the strength of its reliability?
 22 **A. [Redacted section]**
 23 **Therefore, that I believed that that information was**
 24 **good.**
 25 Q. Was that information ever repeated to you during the

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1 **A. Yes.**
 2 Q. Was that an important piece of intelligence in your
 3 mind?
 4 **A. Yes.**
 5 Q. Why?
 6 **A. Because it -- for me it just reaffirmed the fact that**
 7 **the individuals that we would be dealing with were going**
 8 **to be experienced and not just people plucked off the**
 9 **street to come and help.**
 10 Q. Let's move to the deployment, please.
 11 Your role, together with K78, was that you were to
 12 be positioned in a van next to the Audi vehicle whilst
 13 the probe was being fitted?
 14 **A. That's correct, sir.**
 15 Q. Was there also another backup van some distance away?
 16 **A. We were the close support, in the back of the TSU --**
 17 **sorry, the technical support unit deployment van.**
 18 Q. Yes.
 19 **A. There would have been some members of Orange Team in**
 20 **another CTSFO van, that would have been away from us,**
 21 **but would have been able to come in and support.**
 22 **And I think there were also another two officers**
 23 **from Orange Team in a vehicle that could come in and**
 24 **provide the scenario if it wasn't a full compromise and**
 25 **just a person coming to ask the tactical support unit**

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1 course of this operation by any other officer in any
 2 other circumstances?
 3 **A. I can't remember, sorry.**
 4 Q. All right. You are unable to say from your knowledge as
 5 to whether anybody else, any other firearms officer was
 6 provided with that information?
 7 **A. I can't remember.**
 8 Q. Sorry?
 9 **A. I can't remember.**
 10 Q. You cannot remember.
 11 Did you make a note of it?
 12 **A. A mental note, yes. Yes.**
 13 Q. What did it mean to you that Izzet Eren didn't want boys
 14 on the job, he wanted experienced people?
 15 **A. That it meant that: that he wanted experienced people**
 16 **and not boys.**
 17 Q. So nobody inexperienced, experienced in what did you
 18 take that to mean?
 19 **A. Experienced in being able to hold up a prison van and**
 20 **break him out of that prison van.**
 21 Q. So experienced in firearms?
 22 **A. In firearms.**
 23 Q. You made a mental note of that --
 24 **A. Yes.**
 25 Q. -- did you say?

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1 **what they were doing, so they would just come in and try**
 2 **and placate the people who were asking and protect the**
 3 **unit that were deploying.**
 4 Q. Right.
 5 When you were deployed that day, did anybody advise
 6 you or guide you as to the opportunity that that
 7 presented, you getting so close to the Audi vehicle, for
 8 you to take a good look at the vehicle and to even, if
 9 only mentally, note some of the physical properties of
 10 the car?
 11 **A. Unfortunately I was in the back of a van with no windows**
 12 **on that particular deployment, so I did not have the**
 13 **opportunity to look at the Audi that was being worked**
 14 **on.**
 15 Q. At all?
 16 **A. Not at all.**
 17 Q. All right.
 18 Nobody had provided you with any guidance to do that
 19 beforehand?
 20 **A. No.**
 21 Q. You didn't have opportunity to do it in any event?
 22 **A. No, sir.**
 23 Q. Wednesday, 9 December, you drove two officers, W112 and
 24 N79, to the general Wood Green area so that they could
 25 familiarise themselves with the area?

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1 **A. That's correct.**
 2 Q. Who tasked you to do that?
 3 **A. It would have been either S105 or S111 that just asked**
 4 **me to just show them the area.**
 5 Q. You felt, by that stage, confident enough in what you
 6 had seen and the maps that you had prepared, to provide
 7 them with the wisdom that you had gained, your
 8 knowledge?
 9 **A. Yes, because I had driven out there on the Sunday,**
 10 **I knew the area by then. So I could just show them the**
 11 **main routes and the court, and that in relation to**
 12 **Eastern Road.**
 13 Q. Did you show them the prison van entrance to the court,
 14 around the back?
 15 **A. I would have driven down Winkfield Road and, yes,**
 16 **I probably would have shown them the entrance to the**
 17 **court.**
 18 Q. Right.
 19 That recce took place prior to the briefing at New
 20 Scotland Yard the following day, so let's move to
 21 Thursday, 10 December.
 22 Do you remember who invited you to the briefing at
 23 New Scotland Yard that day?
 24 **A. I am fairly sure it was S105 that asked me to attend.**
 25 Q. Do you know why you were selected to attend?

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1 attend larger briefings, have you experience of there
 2 being a large briefing like this on a previous
 3 deployment, where officers from the various aspects of
 4 what was going to take place on 11 December would have
 5 been present but not firearms officers?
 6 So surveillance officers, admin staff, those in
 7 command, but not firearms officers?
 8 **A. Generally we -- as firearms officers, we generally just**
 9 **attend main briefings. At those main briefings, you**
 10 **would have the surveillance team that you are working**
 11 **with and any other staff that are involved in that**
 12 **operation.**
 13 Q. But you are talking about what was to take place the
 14 following morning, aren't you, the specific briefings --
 15 **A. At a main briefing, yes, sorry, yes.**
 16 Q. So the 5.00 am briefings that were to take place on
 17 11 December?
 18 **A. That's correct.**
 19 Q. Did you know when you were having this discussion with
 20 S105, on 10 December, that this briefing at New Scotland
 21 Yard had been arranged specifically for the purpose of
 22 getting everybody together so that there was a level of
 23 knowledge within each of the teams as to what not only
 24 they were expected to do, but what the other teams were
 25 expected to do as well?

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1 **A. I believe S105 couldn't attend that day, and because**
 2 **I had been involved from the Sunday and had some**
 3 **knowledge, I was asked to attend.**
 4 Q. As his replacement?
 5 **A. Yes. That's correct.**
 6 Q. Were you aware of any other firearms officers being
 7 invited to attend that briefing?
 8 **A. No, I wasn't.**
 9 Q. Did it surprise you when you arrived at the briefing
 10 that you were the only firearms officer present?
 11 **A. No, I think I knew that I was going to be the only**
 12 **representative of the firearms department at that**
 13 **briefing.**
 14 Q. How did you know that?
 15 **A. Because I think S105 told me that I was going to be the**
 16 **only person from the firearms department.**
 17 Q. When you had the conversation with S105, did that
 18 surprise you, that he was telling you that you were
 19 going to be the only firearms officer present?
 20 **A. No, we don't always as a team attend larger briefings.**
 21 **We tend to have information cascaded to us from either**
 22 **our team leaders or 2ICs, who have been sent on their**
 23 **behalf -- sorry, "2ICs", second in commands, been sent**
 24 **on their behalf.**
 25 Q. When you describe that, as firearms officers, you don't

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1 **A. Sorry, what was the question, sorry?**
 2 Q. Did you understand the purpose of the briefing at New
 3 Scotland Yard, that it was specifically for the purpose
 4 of getting all the teams together, so that there was
 5 a cross pollination of knowledge as to what was
 6 expected?
 7 **A. I understand that now.**
 8 Q. Did you know that when you were having the conversation
 9 with S105?
 10 **A. No.**
 11 Q. Right. In fact that was unusual, wasn't it, because
 12 usually the only briefings that would take place would
 13 be on the day of the deployment and specifically geared
 14 towards the separate parts of an operation, the separate
 15 teams?
 16 **A. Yes, I think so.**
 17 Q. Yes.
 18 I am going to try and push you a little further
 19 about the conversation you were having with S105. You
 20 have explained to the inquiry that he was asking you to
 21 attend in his place. What did he say to you about the
 22 fact that you would be the only person there? Was he
 23 saying that with a note of regret or was he simply
 24 advising you that you were going to be the only firearms
 25 officer there?

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1 **A. I don't think it was -- he would have said it with**
 2 **regret. I think it would just have been that I was the**
 3 **only firearms officer attending that briefing.**
 4 Q. As a matter of fact?
 5 **A. Yes.**
 6 Q. All right.
 7 What expectation was there upon you going to the New
 8 Scotland Yard briefing? You have explained how in
 9 normal circumstances firearms officers work with
 10 a schedule of cascading of information down. Did you
 11 have instructions as to how you were going to
 12 disseminate the information that you received during the
 13 course of the New Scotland Yard briefing to the other
 14 firearms officers in your team and in other teams?
 15 **A. So I was asked to attend and I would have disseminated**
 16 **any information that I had gleaned to S105, upon the**
 17 **next time that I saw him.**
 18 Q. So S105 didn't give you any instructions about how you
 19 should conduct yourself at the briefing. By that
 20 I mean, "Make sure you take a good note because you are
 21 the only one there", nor, from what you have said, did
 22 he give you any direction as to how to get that
 23 information to him, "Make sure you send me an email as
 24 soon as you get out, so that I've got all of the
 25 information that is provided". Did anything like that

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1 that?
 2 **A. Yes.**
 3 Q. We are going to take a look at it now, please, it is at
 4 IPC71.
 5 Thank you.
 6 Could we scroll through this, please, Mr Coates.
 7 Was this the first time that you had seen this
 8 PowerPoint or had you seen it before?
 9 **A. I am not sure if a PowerPoint was shown at the Tuesday**
 10 **the 8th briefing.**
 11 Q. For the TSU deployment?
 12 **A. For the TSU deployment.**
 13 Q. Right. Let's scroll through this, please.
 14 Some of this information would have been familiar to
 15 you because we know -- pause there, please -- for
 16 instance that you had seen these photographs before,
 17 hadn't you?
 18 **A. Yes, I had, sir.**
 19 Q. Looking at the photograph of Ozcan Eren, which is the
 20 higher of the two photographs on the right-hand side of
 21 this page, and he is wearing what looks like a man bag,
 22 isn't he, and he is on the telephone?
 23 **A. That's correct, sir.**
 24 Q. The photograph of him below, we can see he doesn't have
 25 a bag and he is not on the phone.

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1 take place in your discussion?
 2 **A. I don't think so, no.**
 3 Q. Did you feel a sense of responsibility to take a very
 4 careful note as to what was being told to you during the
 5 course of that briefing?
 6 **A. I would have -- I would have been taking a mental note**
 7 **of what was said but, from memory, I don't think I wrote**
 8 **anything down, from that briefing.**
 9 THE CHAIRMAN: What did you do with the mental note that you
 10 took?
 11 **A. I would have relayed that information to S105, sir.**
 12 THE CHAIRMAN: When did you relay it and how?
 13 **A. I can't remember, sir.**
 14 THE CHAIRMAN: Do you think, on reflection, that was the
 15 right way of going about things? Given the importance
 16 of the role which you were carrying out?
 17 **A. Yes, sir, possibly.**
 18 THE CHAIRMAN: You think it was the right thing or you think
 19 that perhaps you should have made a note in writing and
 20 recorded how you had disseminated the information?
 21 **A. I perhaps should have written it down, sir, and recorded**
 22 **how I disseminated the information.**
 23 THE CHAIRMAN: Thank you.
 24 MS BLACKWELL: During the course of that briefing
 25 a PowerPoint was shown, wasn't it? Do you remember

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1 Those were photographs that you had seen before,
 2 weren't they?
 3 **A. Yes.**
 4 Q. Because I think they had been provided to you during the
 5 course of the email that was sent to you?
 6 **A. From S105.**
 7 Q. Yes, they were part of the intelligence pack that you
 8 had received on 8 December, weren't they?
 9 **A. Yes.**
 10 Q. Can we keep scrolling through, please.
 11 Again, these photographs would have been familiar to
 12 you as well.
 13 And again. And again. And again, please. And
 14 again.
 15 This relates to the movements of the teams and the
 16 surveillance that is going to take place.
 17 Next page, please.
 18 Thank you, Mr Coates.
 19 That provides detail of where the officers in
 20 command are going to be?
 21 **A. That's correct.**
 22 Q. As in which teams. Yes. Is that the end? Thank you.
 23 And the radio channels that are going to be used.
 24 A plan, which I think might be something which you had
 25 in fact provided. Is that right or is that a different

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1 one?
 2 **A. I don't think I would have provided anything for this**
 3 **PowerPoint.**
 4 Q. All right. That looks like it is the prison. Thank
 5 you. Keep going.
 6 Right, thank you. We can take that down.
 7 I would like to ask you now about a comment that you
 8 made in your witness statement of 22 December 2015,
 9 which is behind our tab 4, and I am going to ask that we
 10 display this, please, it is IPC16 at page 3.
 11 Mr Coates, please could we highlight the paragraph
 12 that begins, "Thursday, 10 December".
 13 Thank you.
 14 I will read from beginning of the paragraph:
 15 "On Thursday, 10 December in the afternoon, I was
 16 asked to attend a briefing at New Scotland Yard fifth
 17 floor briefing room. This was an overview briefing for
 18 surveillance teams. I was the only attendee from the
 19 firearms team. This briefing was recorded. The
 20 briefing was delivered by a chief inspector,
 21 Mr Williams, who was the overall TFC for the operation,
 22 and an officer whose pseudonym I cannot recall, who was
 23 a detective from SCO7, who was the main intelligence
 24 officer."
 25 Indeed that was Mr Kinch, I think, wasn't it?

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1 display this, but if we look together at paragraph 13,
 2 on page 4, you provide a little further information
 3 about this, because you say:
 4 "Having now been shown the transcript of this
 5 briefing, I see that this information is not in the
 6 transcript. I am not able now to remember who provided
 7 this information or at what stage."
 8 You were looking back at what you had said in
 9 December 2015, and you were comparing what was in that
 10 statement to what was in the briefing note, the
 11 transcript of the briefing, and you were identifying
 12 that that information wasn't there?
 13 **A. That is --**
 14 Q. So you must have been wrong about your recollection that
 15 that information had come to you during the course of
 16 the briefing?
 17 **A. Yes, sir.**
 18 Q. All right.
 19 Let's look at other possibilities as to when that
 20 information could have come to you that day.
 21 Following the briefing was there any discussion in
 22 the environs surrounding you and any other officer? In
 23 other words, were there any question and answer sessions
 24 that took place outside of the formal briefing itself?
 25 **A. I can remember talking to two officers outside the**

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1 **A. That's correct.**
 2 Q. Who was originally given a cipher but we now know him by
 3 his name.
 4 "This was to inform the surveillance teams of the
 5 operation and the intelligence available as to what the
 6 OCN intended to do. I cannot be certain but I think it
 7 was at this briefing that information was given that the
 8 same individual who had supplied the machine pistol to
 9 the prisoner who was to appear at Wood Green Crown Court
 10 for the offence of possession of a firearm, who was to
 11 be broken out of the prison van, was believed to have
 12 supplied firearms to the OCN intending to attack the
 13 prison van and effect the breakout."
 14 What you are setting out there is that, although you
 15 cannot be certain, you thought that it was at the New
 16 Scotland Yard believing on 10 December that you were
 17 provided with information that the same individual who
 18 would provide the machine pistol and the other weapon
 19 that were used on 13 October, or seized on 13 October,
 20 was also going to supply weapons for the intended
 21 breakout the following day?
 22 **A. That is the information that I had received.**
 23 Q. All right.
 24 Let's look, please, at your statement of 4 March of
 25 this year, which is behind our tab 8, we don't need to

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1 **briefing room, at New Scotland Yard after the briefing.**
 2 Q. Who were they?
 3 **A. I think -- from memory, I think they were from the**
 4 **surveillance team and maybe from the specialist -- from**
 5 **the SCD07.**
 6 Q. Do you think it was during that conversation that you
 7 were given the information that the same person who
 8 provided the weapons on 13 October was going to provide
 9 them on 11 December?
 10 **A. It is possible that that is where that information came**
 11 **from.**
 12 Q. All right.
 13 Are you certain that it came to you on 10 December?
 14 **A. Not 100 per cent.**
 15 Q. Because the options the following day would have been
 16 the 3.00 am or the 5.00 am briefing, wouldn't they?
 17 **A. Yes.**
 18 Q. The inquiry has heard from Mr Stewart, who presented the
 19 3.00 briefing, that he read line for line, or verbatim,
 20 the briefing note which the inquiry has received and the
 21 information that you have provided about the provision
 22 of the weapons does not appear in that briefing note.
 23 Do you think we can rule out the fact that it came
 24 to you during that 3.00 am briefing?
 25 **A. Yes.**

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<p>1 Q. In relation to the 5.00 am briefing, that briefing was 2 recorded and the transcript does not disclose any of the 3 information that you have provided, in terms of the 4 provision of the weapons. Do you think that we can rule 5 out that as an option? 6 A. Yes, sir. 7 Q. Right. 8 But there is something similar on the FA2 form, 9 which identifies Sinan Ozger, one of the members of the 10 Tottenham Turks, as providing the weapons on 13 October. 11 Let's just look at that for a moment, please. It is 12 IPC1086, page 4. 13 If we can zoom in, please, Mr Coates, at the third 14 paragraph from the bottom, that relates to 15 intelligence -- thank you: 16 "Intelligence received on 29/30 November indicated 17 that Sinan Ozger has been engaged in the movement and 18 safekeeping of firearms and it was Ozger who performed 19 this same function, prior to Izzet Eren's arrest in 20 possession of a loaded Skorpion sub-machine gun on 21 13 October." 22 It is not word for word the same as you say you 23 received on 10 December, but do you think that you may 24 have obtained this information from the FA2 form? If 25 so, can you explain to the inquiry in what circumstances</p> <p style="text-align: center;">Page 61</p>	<p>1 you might have been shown that document? 2 A. I don't think I was ever shown this document, but V64 3 may have mentioned this information to me at some stage. 4 Q. At some stage. 5 And you think it was at some stage proximate to 6 10 December? 7 A. Approximate, sir. 8 Q. All right. 9 Do you think it might have been on that occasion 10 that you were also told of the aborted attempt that took 11 place on 29 November? 12 A. That's a possibility as well, sir. 13 Q. Did anybody ever discuss with you what the tipping 14 points of the operation might be? 15 A. I think the tipping points would have been that as soon 16 as they received the information in C3000 that there was 17 enough evidence to arrest the occupants of the Audi, 18 then we would have moved forward -- 19 THE CHAIRMAN: For what offences? 20 A. For firearms offences, sir. 21 THE CHAIRMAN: For firearms offences. 22 MS BLACKWELL: Is that you surmising that that was the case 23 or -- 24 A. That is me surmising. 25 Q. Right. My question was: did anybody speak to you about</p> <p style="text-align: center;">Page 62</p>
<p>1 the tipping points or were you ever -- were they ever 2 discussed with you by any other officer? 3 A. I can't remember. 4 Q. Right. 5 Did you have a discussion with any other officer 6 about what the tactical plan might be once a tipping 7 point had been reached? 8 A. So the -- once a tipping point had been reached, the 9 plan was to stop the vehicle, intercept the vehicle. 10 THE CHAIRMAN: I'm sorry, you may have made this clear 11 already. Was that your understanding based on 12 experience -- I think this is what Ms Blackwell is 13 trying to get at -- or was there a discussion about 14 tipping points? And, if so, with whom? 15 Is that right Ms Blackwell? 16 MS BLACKWELL: Yes, it is, thank you. 17 A. I don't recall a discussion about tipping points or 18 tactical plans. 19 Q. So the evidence that you have given to the inquiry comes 20 from your expectation and your experience, rather than 21 any discussion that you had with any other officer on 22 the subjects of tipping points or tactical plans? 23 A. Yes, that is from my memory, yes. 24 MS BLACKWELL: I am going to suggest, sir, that we have our 25 break in a moment --</p> <p style="text-align: center;">Page 63</p>	<p>1 THE CHAIRMAN: Certainly. 2 MS BLACKWELL: -- but before I do, I would just like to 3 recap with you your experience of this operation as at 4 the morning of 11 December, because when we come back 5 from our break, we are going to turn to your movements 6 on 11 December. 7 You first became aware of the operation on 8 6 December? 9 A. That's correct. 10 Q. From that point on, you worked on the operation every 11 day until the deployment on 11 December? 12 A. Yes, in -- yes. 13 Q. That work included being briefed by other officers, 14 preparing maps and plans, going out on recces, receiving 15 information and intelligence about the plan of the gang, 16 and also intelligence about their capability, so far as 17 weapons were concerned? 18 A. That's correct. 19 Q. Thank you. 20 THE CHAIRMAN: If we are moving to the 11th, can I just ask 21 one more question about the meeting on the 10th. 22 MS BLACKWELL: Please do. 23 A. Yes, sir? 24 THE CHAIRMAN: You have told us that you were, to your 25 knowledge, the only firearms officer attending that</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

<p>1 meeting?</p> <p>2 A. That's correct, sir.</p> <p>3 THE CHAIRMAN: Would it have been aware to anybody at the</p> <p>4 meeting that you were in fact the representative of the</p> <p>5 firearms officers, there in lieu of S105?</p> <p>6 A. I think FE16 knew that there was a firearms officer</p> <p>7 there, but I think he said words to the effect of he</p> <p>8 didn't expect everyone to be there because they were</p> <p>9 deployed doing other roles.</p> <p>10 THE CHAIRMAN: Did he know that in fact you were the only</p> <p>11 firearms officer to have been asked?</p> <p>12 A. I don't know that for sure, sir.</p> <p>13 THE CHAIRMAN: Yes.</p> <p>14 MS BLACKWELL: Sir, another point does occur to me that</p> <p>15 perhaps I should have covered in relation to the</p> <p>16 meeting.</p> <p>17 THE CHAIRMAN: Thank you.</p> <p>18 MS BLACKWELL: Do you remember being asked to sign the</p> <p>19 attendees sheet at the meeting?</p> <p>20 A. I don't remember, sorry.</p> <p>21 THE CHAIRMAN: Thank you, yes.</p> <p>22 MS BLACKWELL: Because the inquiry has been provided with</p> <p>23 that sheet and your name does not appear there.</p> <p>24 Might that suggest that you attended late?</p> <p>25 A. No, I was -- I was there on time and I was there for the</p> <p style="text-align: center;">Page 65</p>	<p>1 start of ... of the briefing.</p> <p>2 Q. But nobody asked you to sign it and you had no idea in</p> <p>3 fact of its existence; is that right?</p> <p>4 A. That's correct.</p> <p>5 THE CHAIRMAN: Presumably, at no stage did FE16 say either</p> <p>6 to you or generally that he had hoped that as many</p> <p>7 firearms officers as possible would attend?</p> <p>8 A. No, sir.</p> <p>9 THE CHAIRMAN: Does that come as a surprise to you, that</p> <p>10 that was his hope and expectation subject to other</p> <p>11 deployments?</p> <p>12 A. Hmm ...</p> <p>13 I -- I don't know, sorry, sir.</p> <p>14 THE CHAIRMAN: Thank you.</p> <p>15 MS BLACKWELL: Is that a convenient time?</p> <p>16 THE CHAIRMAN: Yes, 11.45?</p> <p>17 MS BLACKWELL: Yes.</p> <p>18 THE CHAIRMAN: Thank you very much.</p> <p>19 (11.32 am)</p> <p>20 (A short adjournment)</p> <p>21 (11.50 am)</p> <p>22 THE CHAIRMAN: Yes, Ms Blackwell.</p> <p>23 MS BLACKWELL: Thank you, sir.</p> <p>24 We are turning now to deal with the events on</p> <p>25 11 December.</p> <p style="text-align: center;">Page 66</p>
<p>1 In the run up to 11 December you had been working,</p> <p>2 as we established, on this operation from the 6th, from</p> <p>3 the week before. Do you remember what your shift</p> <p>4 pattern was like in the fortnight preceding 11 December?</p> <p>5 Have you had an opportunity to think about that?</p> <p>6 A. So the week before the 11th, I was off every day, it was</p> <p>7 rest days.</p> <p>8 And the week prior to that was -- we had performed</p> <p>9 a whole week of IRT, which is an on call -- sorry, is</p> <p>10 a response to any terrorist incidents, so we are held at</p> <p>11 our base overnight, just in case there are any ...</p> <p>12 anything that needs dealing with ...</p> <p>13 Q. Necessary deployments?</p> <p>14 A. Yes, sorry, any necessary deployments.</p> <p>15 Q. Not at all.</p> <p>16 A. So that was a -- and then the week prior to the 6th,</p> <p>17 I was off.</p> <p>18 Q. Right, so when did you come on duty. Was Sunday the 6th</p> <p>19 your first day back from a week of leave?</p> <p>20 A. Yes, I had been off from the Monday.</p> <p>21 Q. Right.</p> <p>22 A. On rest days, not leave.</p> <p>23 Q. I am so sorry, rest days, which in practical terms means</p> <p>24 that you were not asked to come into work to Leman</p> <p>25 Street or deployed in any sense during the course of</p> <p style="text-align: center;">Page 67</p>	<p>1 that week?</p> <p>2 A. No.</p> <p>3 Q. The week prior to that, you were --</p> <p>4 A. Night duty.</p> <p>5 Q. You were on night duty.</p> <p>6 When you are effectively on call, I am going to</p> <p>7 refer to it as, do you stay in central London at a hotel</p> <p>8 or do you deploy, if necessary, from your home address?</p> <p>9 A. So an on call, I deploy from my home address, if I was</p> <p>10 on call.</p> <p>11 Q. But that is not what you were describing?</p> <p>12 A. No. No, no.</p> <p>13 So the week of nights, I was actually coming into</p> <p>14 Leman Street --</p> <p>15 Q. Right.</p> <p>16 A. -- and working and then going back home each day.</p> <p>17 Q. Are you able to recollect during that week whether or</p> <p>18 not you were deployed at all overnight?</p> <p>19 A. I can't remember, sorry.</p> <p>20 Q. Right.</p> <p>21 In the week that began with Sunday, 6 December, did</p> <p>22 you work the same shift pattern each day?</p> <p>23 A. No, because obviously we had an early start on the</p> <p>24 Tuesday for the technical support unit deployment.</p> <p>25 Q. Yes.</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

1 **A. So that would have been an earlier start.**
 2 **The Wednesday, from memory, was an 8 to 4, so a day**
 3 **shift.**
 4 **On the Thursday I was told that I could come in**
 5 **later, because I was attending the meeting and then**
 6 **I would be provided with a hotel room, so I could get**
 7 **some rest.**
 8 Q. And that is indeed what happened?
 9 **A. That's correct.**
 10 Q. Did you stay in the hotel together with some of the
 11 other CTSFOs?
 12 **A. Some of the other CTSFOs.**
 13 Q. All right.
 14 Did you sleep well that night?
 15 **A. Yes.**
 16 Q. You deployed on the morning of 11 December at some time
 17 before 3.00 am, because we know you attended Leman
 18 Street at that time to be briefed.
 19 **A. That's correct, sir.**
 20 Q. Yes. You, having arrived at the base, set about putting
 21 your maps and plans on the wall for that 3.00 am
 22 briefing, didn't you?
 23 **A. That's correct, sir.**
 24 Q. Did you form any part of the briefing that was given at
 25 3.00 am, did you provide any information to the officers

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1 IPC537, please.
 2 As I have already established with you the briefing
 3 was not recorded but V64, Mr Stewart, has given evidence
 4 to the inquiry that he read out verbatim what is
 5 contained within this note. Let's zoom in, please,
 6 Mr Coates, if we can, on the paragraph that is four from
 7 the bottom, beginning with the word "Reliable ..."
 8 Thank you:
 9 "Reliable and high-graded intelligence indicates
 10 that there is an ongoing conspiracy to assist Izzet Eren
 11 in escaping from custody on Friday, 11 December 2015.
 12 The intelligence suggests that those seeking to carry
 13 out this offence will be in possession of firearms and
 14 other weapons."
 15 Can we zoom back in and continue down the page,
 16 please:
 17 "The intelligence indicates that the attempt to free
 18 the defendant will be focused on the prisoner van
 19 transporting him from Wormwood Scrubs prison and before
 20 he reaches the confines of the court building. It is
 21 not known whether Gyamfi will also be assisted in
 22 escaping.
 23 "There is no intelligence that any attempt will be
 24 made whilst Izzet Eren is at court or to smuggle weapons
 25 into the premises by breaching existing security

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1 there?
 2 **A. Yes, sir, I provided the information as to where the**
 3 **vehicle was positioned in Eastern Road, and that in**
 4 **relation to Wood Green Crown Court and the holding**
 5 **areas. So I went through those -- the maps and plans**
 6 **that I had already ... you have already seen.**
 7 Q. You were assisted by W97, I think?
 8 **A. I believe W97 gave the briefing to his team regarding**
 9 **the surveillance operation on the Serco vehicle.**
 10 Q. Right. And V64, who was the main briefing officer --
 11 **A. Yes, that's correct.**
 12 Q. -- provided information. Would you have described that
 13 as a tactical briefing?
 14 **A. Yes, I would, sir.**
 15 Q. Right. What was the main purpose in it, as far as you
 16 were concerned?
 17 **A. The main purpose is to -- for those that had not had any**
 18 **prior information to be told about why we were there,**
 19 **because it was a confidential operation, so it wasn't**
 20 **common knowledge to everyone prior to that day.**
 21 Q. Right.
 22 Part of the information that was provided by V64
 23 related to intelligence, didn't it?
 24 **A. That's correct.**
 25 Q. Let's take a look at his briefing note once again, it is

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1 measures.
 2 "However, should an escape bid not occur prior to
 3 his arrival, as an operational contingency to maximise
 4 the safety of all court users, a request has been made
 5 to have two covert armed officers present throughout the
 6 court hearing."
 7 Can we scroll down, please:
 8 "A further contingency of placing the defendants in
 9 a totally secure dock has been agreed. It is our
 10 assessment that any further attempt to facilitate
 11 an escape would be made only after Eren left court.
 12 Izzet Eren is a senior member of a familial Turkish
 13 crime group who had returned to the UK in breach of
 14 a deportation order having been sentenced for drugs
 15 trafficking offences. The Erens represent the Tottenham
 16 element of a long-running feud with the rival Hackney
 17 Turks, which has seen numerous shootings and murders
 18 dating back to 2009 in both London and Turkey."
 19 Can we just scroll up to the place that we started,
 20 thank you.
 21 You were present whilst this briefing was delivered,
 22 including, as it did, a reference to what is described
 23 here as "reliable and high-graded intelligence".
 24 **A. That's correct, sir.**
 25 Q. Did you accept what V64 was saying, that the reliable

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<p>1 and high-graded intelligence provided an indication that 2 those seeking to carry out the offence would be in 3 possession of firearms and other weapons? 4 A. Yes, sir. 5 Q. And, moreover, that this organised crime network had 6 a capability, as far as firearms were concerned, that 7 was proven by their history, which we have seen deployed 8 in the schedule that we went through this morning? 9 A. That's correct, sir. 10 Q. That was the state of your knowledge and that was 11 confirmed by this information during the course of this 12 briefing? 13 A. That's correct, sir. 14 Q. All right. 15 When you left the briefing at 3.00 am, were you in 16 any doubt that the gang who were going to effect the 17 escape would be in possession of live firearms? 18 A. Given everything that I sort of -- all the information 19 that I had at that stage, I was fairly certain that 20 they'd have firearms with them. 21 Q. Live firearms? 22 A. Live firearms. 23 Q. You then moved to Lincoln Road and attended the 5.00 am 24 briefing. That was recorded, the inquiry has been 25 provided with the transcript. Have you had</p> <p style="text-align: center;">Page 73</p>	<p>1 an opportunity of reviewing the transcript at some point 2 as well? 3 A. Yes. 4 Q. Thank you. 5 That included further reference to firearms 6 capability. It was delivered in the main by S105, 7 wasn't it? 8 I am so sorry, Keely Smith, FE1, provided some of 9 the information, I think Mr Kinch provided some 10 information and also S105 provided some of the 11 information as well? 12 A. That's correct. 13 Q. I would just like us to look, please, at some of the 14 information that was provided during the course of that 15 briefing, simply for you to confirm that you heard this 16 during the course of the briefing. 17 Can we go, please, to IPC238. And page 5, please, 18 on the document. 19 During the course of S105's briefing, he said this, 20 and I am focusing towards the bottom of the page: 21 "Right, if authorised to do so we aim to carry out 22 our armed interception. Exact location, time and 23 circumstances are very much dependent on what is 24 happening at the time. It could be where it is now ..." 25 That is a reference to the vehicle, isn't it, the</p> <p style="text-align: center;">Page 74</p>
<p>1 Audi vehicle? 2 A. It is, yes. 3 Q. "... or it could be somewhere completely different, and 4 we have got to remain fluid around that. It could be 5 that we are redeployed fairly quickly. Needless to say, 6 my team provided the TFC with a number of tactical 7 options around pedestrians, vehicles and premises." 8 Just pausing there, did you understand what S105 was 9 saying when he described his team having provided the 10 TFC with a number of tactical options around 11 pedestrians, vehicles and premises? 12 A. Yes. 13 Q. What was he referring to? 14 A. To the MASTS capability, so a MASTS provides a whole 15 range of tactics, and that is what he was referring to 16 here. 17 Q. Of the tactics provided by the MASTS configuration, in 18 your mind, and from any information that you had 19 received, was there any tactic more likely to be used 20 than any other? 21 A. Vehicle interception. 22 Q. Right, and that was because you expected the Audi 23 vehicle to be used as a mission vehicle during the 24 course of the offence? 25 A. That's correct.</p> <p style="text-align: center;">Page 75</p>	<p>1 Q. Did you have any knowledge of the way in which that 2 vehicle was to be used or was likely to be used? 3 A. No. At that stage we didn't have any -- it was a means 4 of getting the people from where they were to the prison 5 van. 6 Q. Right. So from that answer, did you expect that vehicle 7 to be used to carry those who were going to be commit 8 the offence? 9 A. That's correct, sir. 10 Q. Right. So it was likely in your mind that, if firearms 11 were going to be used during the course of the offence, 12 they would be carried in that vehicle? 13 A. Yes. 14 Q. Does it follow from that that you expected, during the 15 vehicle stop or the interception, that you would be 16 faced with a vehicle in which there were live firearms? 17 A. Yes, sir. 18 Q. Is that something that you were told or advised about, 19 something that you discussed with any other officer or 20 is that just your own summation that came from your 21 experience and what you knew of the gang? 22 A. V64 had said in his briefing that they would have 23 firearms and use firearms to effect the escape. 24 That, with all the other information that I had, 25 then I was expecting there to be live firearms in that</p> <p style="text-align: center;">Page 76</p>

19 (Pages 73 to 76)

1 **vehicle.**
 2 Q. Right. At the time that you expected to be involved in
 3 an interception or an extraction; is that right?
 4 **A. Yes, that's right.**
 5 Q. Thank you.
 6 Let's just move down the page, please, Mr Coates, to
 7 the following page, in fact. If we go down to the next
 8 page, page 7. Thank you.
 9 I would just like to remind you of something that
 10 was said in the middle of this page. It is just above
 11 the midline, a sentence which begins, "Any sort of
 12 vehicle pursuit ..."
 13 Do you have that?
 14 **A. Yes.**
 15 Q. "Any sort of vehicle pursuit at all, you have heard
 16 about the weapons that these guys have got access to in
 17 the past and what they can (inaudible) vehicles to
 18 pursue. Please, please treat these people as armed
 19 until we know otherwise."
 20 Is that an instruction that had a note of
 21 familiarity with you?
 22 **A. Yes. Yes.**
 23 Q. In what circumstances had you heard it before?
 24 **A. We do treat people as armed until we know otherwise, and**
 25 **that is our training. That is what we have -- certainly**

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1 3.00 am. Would that, as well, have been taken into
 2 account in your mind --
 3 **A. Yes.**
 4 Q. -- in assessing your level of certainty as to whether
 5 firearms were likely to be used?
 6 **A. Yes, sir.**
 7 Q. Yes.
 8 Finally, if we go to paragraph 10 on this document.
 9 MS MURPHY: I am terribly sorry, if we could possibly have
 10 the mic a little closer to the witness, please.
 11 Thank you very much.
 12 MS BLACKWELL: Yes:
 13 "The operational team have identified a stolen Audi
 14 motor vehicle which is assessed as being intended to be
 15 used in the commission of this offence. This vehicle is
 16 under the control of the operational team."
 17 You knew that because you had been involved in the
 18 TSU deployment, hadn't you?
 19 **A. Yes.**
 20 Q. Yes, all right, thank you. We can take that down.
 21 Moving back to the Lincoln Road briefing, please,
 22 that we had reached at 5.00 am and turning if we may to
 23 the PowerPoint that was produced at IPC 39, please,
 24 thank you, and can we go to page 5.
 25 This was at least the third time that you had seen

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1 **that is what we are taught from a very early stage in**
 2 **our firearms training.**
 3 Q. That did not come as a surprise to you when S105
 4 directed you to do that?
 5 **A. No.**
 6 Q. Right. In fact from what you have said, if it was part
 7 of your firearms training, you would expect him to say
 8 that?
 9 **A. Yes, I would expect him to say -- to treat -- especially**
 10 **in this case, where we had had all the information that**
 11 **they were going to be armed.**
 12 Q. Right.
 13 Whilst we are on this topic, I am just going to take
 14 you back to the Leman Street briefing note, please, so
 15 could we put back on the screen IPC537, at page 2.
 16 The sixth paragraph down, if we could just highlight
 17 that, please, Mr Coates, "Given the antecedents ..."
 18 Thank you:
 19 "Given the antecedents of this criminal network and
 20 the fact that any successful attempt would involve
 21 considerable threat and duress to any custodians, it is
 22 assessed that firearms will be used to effect the
 23 escape."
 24 Just to point out to you that that was also
 25 something that was said to you in the briefing at

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1 these photographs, wasn't it?
 2 **A. That's correct, sir.**
 3 Q. It may be that you had seen it more than three times,
 4 but I am not going to take us through the whole of this
 5 document, it is the same as the one that we went through
 6 before the break.
 7 This information was not new information, as far as
 8 you were concerned.
 9 **A. No, sir.**
 10 Q. Do you know whether or not anybody else in the briefing
 11 at 5.00 am, any other firearms officer, was seeing this
 12 for the first time?
 13 **A. Possibly the armed response vehicles were seeing this**
 14 **for the first time, because they, again, because it was**
 15 **a confidential operation, they would have only been**
 16 **notified probably the day before or maybe on the morning**
 17 **of the event.**
 18 **And there may have been some of my team that hadn't**
 19 **seen these images before.**
 20 Q. Right. But certainly it was that you had?
 21 **A. Yes, I had.**
 22 Q. But presumably you concentrated during the course of the
 23 briefing and took in again what you had seen previously?
 24 **A. Yes.**
 25 Q. Yes. All right.

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1 May we take that down, please, and I am going to ask
 2 that we look at your witness statement behind tab 8,
 3 please, and I am going to ask that we display this as
 4 well.
 5 Mr Coates, it is SLA6 at page 6, and please could we
 6 highlight paragraph 20.
 7 Just to establish what your state of mind was at the
 8 end of this briefing I am going to read this into the
 9 record:
 10 "At the end of this briefing my state of mind was
 11 that the attack was likely to happen, that it would be
 12 undertaken by a group of experienced and dangerous
 13 individuals who would be armed and would use firearms in
 14 the course of the offence. The fact that the main
 15 suspect had previously been caught in possession of
 16 a loaded machine pistol caused my threat assessment to
 17 be very high."
 18 Pausing there, can you confirm, please, that that
 19 was the level of your threat assessment by the time that
 20 you had finished at the 5.00 am Lincoln Road briefing?
 21 **A. I would say very high.**
 22 Q. "Based on the information given at the briefing
 23 I believed that the suspects would be armed with
 24 weapons, possibly machine pistols, to enable the attack.
 25 Whilst we undertake a lot of operations where the

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1 The purpose of you undertaking your own threat
 2 assessment is to inform you of how poised and prepared
 3 you should be so as to protect yourself and the public
 4 and the subjects at the point of interception, isn't it?
 5 **A. That's correct.**
 6 Q. The higher the threat, the more alert you will need to
 7 be to the risks that may develop during the course of
 8 that interception?
 9 **A. That's correct.**
 10 Q. Where you assess the threat to be very high, that means
 11 you are going to be as alert as possible?
 12 **A. Yes.**
 13 Q. Consistently ready to protect yourself and the public
 14 from the subjects?
 15 **A. Yes.**
 16 Q. We can take that down, now, please, Mr Coates.
 17 I am not going to take us back to it, but I will do
 18 if you have any difficulty recollecting it. During the
 19 course of the 5.00 am briefing Keely Smith had assessed
 20 the threat or the risk to various individuals or
 21 organisations as being universally low; do you remember
 22 that?
 23 **A. Yes.**
 24 Q. Did that strike you as odd during the course of the
 25 briefing?

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1 intelligence is that a suspect may be in possession of
 2 firearms, it is fairly rare where the intelligence is
 3 that the suspect may be armed with a machine pistol."
 4 Pausing there, had you ever been involved in
 5 a deployment prior to this one in which the intelligence
 6 indicated that the suspect may be armed with a machine
 7 pistol?
 8 **A. I don't think so, no.**
 9 Q. "In this operation there was the added factor that the
 10 main suspect had actually been arrested in possession of
 11 a loaded machine pistol in the past."
 12 Was that factor also taken into account by you in
 13 assessing the threat as being very high, posed to you?
 14 **A. Yes.**
 15 Q. That was your assessment of the threat posed to you at
 16 the point of interception?
 17 **A. At this stage?**
 18 Q. Yes.
 19 **A. Yes.**
 20 Q. Is very high the highest level on your personal scale?
 21 **A. All I can say is it was very high.**
 22 **Pretty near, I would think, my sort of --**
 23 Q. To the top of the scale?
 24 **A. My sort of top scale.**
 25 Q. Right.

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1 **A. It -- yes, I suppose it did at the time.**
 2 Q. Because it could not have been farther from your
 3 personal assessment of the threat and risk posed, could
 4 it?
 5 **A. No, it couldn't have been further.**
 6 Q. Did you raise any concerns with anybody about the
 7 divergence between her assessment and yours?
 8 **A. No, I didn't, sir.**
 9 THE CHAIRMAN: Why not?
 10 **A. Because the -- that assessment is made prior to the**
 11 **deployment.**
 12 THE CHAIRMAN: So why did it surprise you?
 13 **A. Sorry, sir?**
 14 THE CHAIRMAN: If it was made prior to the deployment --
 15 **A. Yes.**
 16 THE CHAIRMAN: -- and therefore doesn't have a bearing on
 17 the threat that you face when deployment takes place,
 18 why were you surprised at that stage that the threat
 19 assessment was low?
 20 **A. I don't ... I think I misunderstood the question, sir,**
 21 **sorry.**
 22 THE CHAIRMAN: Which one, mine or Ms Blackwell's?
 23 **A. No, it was ...**
 24 MS BLACKWELL: My question.
 25 **A. I don't think I was surprised at that initial -- at that**

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1 **assessment we were told.**
 2 Q. Is that because you understood her to be making her
 3 assessment at the time in the briefing room and not at
 4 the point of interception?
 5 **A. That was my understanding, yes, sir.**
 6 THE CHAIRMAN: What is the relevance -- this is not a loaded
 7 question, it is a question which I ask in an attempt to
 8 learn something -- of a risk assessment, whether it be
 9 low, high or medium, at a time and place remote from the
 10 deployment?
 11 **A. I understand, sir. I can only suggest that it might be**
 12 **part of the sort of corporate risk assessment.**
 13 THE CHAIRMAN: But it is, is it not, of -- it may be of
 14 interest to you, but it has actually no bearing
 15 whatsoever on how you or other firearms officers will
 16 feel or the risk that you will feel applies to you at
 17 the time of the deployment?
 18 **A. That's right, sir.**
 19 THE CHAIRMAN: Yes. Thank you.
 20 MS BLACKWELL: Thank you, sir.
 21 So, as far as you are concerned, and the threat
 22 which is posed to you at the time of interception,
 23 Keely Smith's assessment of what the risk is at 5.00 am
 24 in the briefing room is meaningless, isn't it?
 25 **A. Yes, it is, sir.**

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1 **A. No.**
 2 Q. Right.
 3 Moving on from the briefing, once it had finished,
 4 did you get kitted up for the event?
 5 **A. At Leman Street?**
 6 Q. Yes.
 7 **A. Yes, I did.**
 8 Q. So you went back to Leman Street?
 9 **A. Sorry, so after our 3.00 am briefing we got all our**
 10 **equipment together, put it in the vehicles and then went**
 11 **to Lincoln Road for the main briefing.**
 12 Q. So at the time of the 5.00 am briefing, you already had
 13 your kit?
 14 **A. Yes, that's correct.**
 15 Q. That consisted of what, covert body armour?
 16 **A. Sorry, yes, so a personal kit would have been covert**
 17 **body armour, my holstered Glock pistol.**
 18 Q. Was that your personal issue firearm?
 19 **A. Yes.**
 20 **My SIG/MCX. I also would have had access to**
 21 **a Benelli shotgun.**
 22 Q. When you say you would have had access to one, did you
 23 pick it out of the armoury and take it with you?
 24 **A. No, that was all -- I think S105 drew that particular**
 25 **weapon from the armoury on that day.**

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1 Q. I was just looking once again at the precise words used,
 2 to see whether it is worth going to the document, but in
 3 fact she doesn't, in providing the universal assessment
 4 as being low, indicate precisely the time at which it is
 5 relevant.
 6 THE CHAIRMAN: No. But I think one had the impression from
 7 the evidence that she gave that she was considering the
 8 position at the time.
 9 MS BLACKWELL: Yes, quite so.
 10 THE CHAIRMAN: The general impression we have had from any
 11 witnesses who have been asked about risk assessments,
 12 corporate risk assessments, is that they are considered
 13 in the light of the risk that people face at that time.
 14 MS BLACKWELL: Yes, thank you, sir.
 15 Just before we leave this topic, if I may, you were
 16 briefed expressly during the course of this briefing at
 17 5.00 am that you, as an armed police officer, faced
 18 a risk that was low and you have explained that it was
 19 considerably different to your own assessment, because
 20 your assessment was at the stage of interception and the
 21 level of threat and risk that was posed to you at that
 22 time.
 23 Did Keely Smith's assessment of the risk being low
 24 cause you at all to consider or question whether you had
 25 misunderstood the intelligence picture or not?

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1 Q. Right. Did you know at the time that you were obtaining
 2 your weapons the place that you were to take up in the
 3 vehicle, and which vehicle you would be in?
 4 **A. I think we had already discussed that on our way**
 5 **probably down to the -- to our armoury, the fact that**
 6 **I was -- because I knew the area, I was going to sort of**
 7 **read the maps and be in the back of the vehicle.**
 8 Q. Just could I ask you to pause there, when you say you
 9 knew the area, only from the reces that you had
 10 performed that week?
 11 **A. That's correct, sir.**
 12 Q. Yes.
 13 So with that knowledge, it was decided that you
 14 would sit in the back of the car and it would be part of
 15 your task to follow the maps and to direct, if
 16 necessary?
 17 **A. That's correct, sir.**
 18 Q. All right.
 19 Did that mean that you would be expected to deploy
 20 with any particular type of weapon?
 21 **A. No. I had -- as I have already said, I had my personal**
 22 **weapons, so my pistol and my carbine, and the person in**
 23 **the rear seat is generally responsible for the**
 24 **deployment of the tyre-deflation rounds, if we have to**
 25 **use it, so the Benelli shotgun.**

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1 Q. Right. So although you didn't take that weapon from the
 2 armoury, you think that that was done by S105, because
 3 of the position that you were at that take up in the
 4 vehicle, if that weapon, the Benelli shotgun was to be
 5 taken, it would be you, it would be down to you to take
 6 it?
 7 **A. It would be me, yes, that would deploy with that weapon.**
 8 Q. Right. What about less-lethal options?
 9 **A. So at that time, I believe there was only one Taser**
 10 **between -- available for the vehicle, and generally it**
 11 **would be the driver that is armed with the Taser.**
 12 Q. Did you take a Taser from the armoury?
 13 **A. No, I didn't take a Taser.**
 14 Q. Right. So you presumed that if one was being carried in
 15 the vehicle, it would be R116, the driver, who would
 16 obtain that and take it with him?
 17 **A. Yes, that is how we generally worked at that time.**
 18 THE CHAIRMAN: One Taser per vehicle?
 19 **A. One Taser, sir.**
 20 THE CHAIRMAN: Was that how you operated?
 21 **A. Yes, sir.**
 22 THE CHAIRMAN: Did it surprise you to know that we have
 23 heard there were two Tasers available to at least two of
 24 the vehicles?
 25 **A. Sir, I think what happened was that because another team**

1 **was supporting us, they had access to their armoury and**
 2 **drew their own team Tasers. Which allowed them to have**
 3 **an extra Taser.**
 4 THE CHAIRMAN: Why did that not apply to you or to your
 5 team?
 6 **A. In my team at that time, from memory, we only had one**
 7 **Taser per vehicle.**
 8 THE CHAIRMAN: Yes, thank you.
 9 MS BLACKWELL: Was there any CS gas provision?
 10 **A. So the vehicle's grab bag, I think at the time had CS in**
 11 **it, in a canister form, and some of the shotgun rounds,**
 12 **the Benelli rounds, some of those would have been CS**
 13 **rounds.**
 14 Q. Right.
 15 Those rounds would have been carried also in the
 16 grab bag, would they? Or would they have been?
 17 **A. In the grab bag.**
 18 Q. Right, so was the Benelli shotgun loaded with rounds
 19 different to CS gas?
 20 **A. So it isn't loaded, but we have a rail on the side of**
 21 **the weapon that we can put four or five -- I can't**
 22 **remember now, four or five cartridges on the side of the**
 23 **weapon, so, excuse me, if it is required, we can quickly**
 24 **make it ready in the vehicle and that would have been**
 25 **what we called a steel ram round, which is a powdered**

1 **steel held in a shotgun cartridge that when you fire it**
 2 **at a tyre, it deflates the tyre.**
 3 Q. All right.
 4 **A. Or disrupts a lock, if we are firing at a door.**
 5 Q. But from what you describe, there was also an option to
 6 load the Benelli shotgun with CS gas capsules or
 7 pellets?
 8 **A. We would have had access to CS, but I don't think it was**
 9 **a consideration at all during this operation.**
 10 Q. All right, so take the details of this operation out of
 11 it. At the moment I am attempting to establish your
 12 capability.
 13 **A. Okay.**
 14 Q. From what you have described, there were CS gas pellets
 15 within the grab bag that could have been placed inside
 16 the Benelli shotgun in order to utilise CS gas in that
 17 way, to fire them into the vehicle?
 18 **A. From memory, yes.**
 19 Q. From what you have said, that was not a consideration of
 20 yours, nor was it anything that was discussed between
 21 the three of you in your vehicle?
 22 **A. That's correct.**
 23 Q. Just so that I am sure, there was a CS gas canister
 24 within the grab bag as well that could have been
 25 utilised during the operation?

1 **A. I am fairly sure at that time that there was a CS**
 2 **canister in the grab bag?**
 3 Q. One or more than one?
 4 **A. I am not sure, sorry, I can't remember.**
 5 Q. But you didn't arm yourself with any CS gas?
 6 **A. No, I didn't.**
 7 Q. Did you know at the time that there would be a CS gas
 8 canister in the grab bag and the CS pellets that could
 9 have been used in the Benelli shotgun?
 10 **A. Yes.**
 11 Q. Who took the grab bag?
 12 **A. The grab bag would have been booked out by S111 and that**
 13 **would have been in the rear of our vehicle.**
 14 Q. Do you remember seeing it in the rear of the car?
 15 **A. No. I don't, sorry.**
 16 Q. All right.
 17 Before leaving Lincoln Road, had you become aware
 18 that the Audi vehicle had begun to move?
 19 **A. Yes.**
 20 Q. How did you become aware of that?
 21 **A. We were told over the channel that the Audi was now**
 22 **moving, over our radio channel.**
 23 Q. So you were positioned in the vehicle listening to the
 24 radio channel on the radio system within the vehicle?
 25 **A. Yes, that's correct.**

1 Q. You were told that the Audi vehicle had begun to move.
 2 I would like to just take you for a moment, please,
 3 to your witness statement of March of this year, which
 4 is at SLA6, please, Mr Coates. This is behind
 5 divider 8, and you may still have it open from before.
 6 It is paragraph 23. This is at page 6, Mr Coates.
 7 Could we highlight paragraph 23, please.
 8 This is once you had left Lincoln Road:
 9 "We then moved the team to Quicksilver, which is
 10 a holding area in between Wood Green Crown Court and the
 11 location of the stolen Audi. This would give us the
 12 opportunity to respond quickly should the Audi start
 13 moving once the prison van was in close proximity to the
 14 court. Before we got to Quicksilver, we received
 15 information that the Audi was moving. This confirmed in
 16 my mind that the attack was going to happen that day.
 17 The intelligence was proving to be good and it seemed
 18 certain the attack was going to happen that day. We
 19 were told that the prison van had not left Wormwood
 20 Scrubs and so the attack was not imminent."
 21 I would like you to explain the sentence, "This
 22 confirmed in my mind that the attack was going to happen
 23 that day".
 24 What was it that confirmed in your mind that the
 25 attack was going to happen?

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1 the probe into the Audi. That was going to provide
 2 a source of intelligence or information, wasn't it, once
 3 the occupants of the vehicle started to speak?
 4 **A. That's correct.**
 5 Q. But there was intelligence that had come to your
 6 attention prior to that, and in the days running up to
 7 the deployment on 8 December.
 8 **A. Yes.**
 9 Q. Yes. At this stage did you have any thoughts about the
 10 source of that intelligence, the reliability of it, or
 11 were you simply connecting the movement of the Audi
 12 vehicle to the fact that it was consistent with what you
 13 were told might happen?
 14 **A. That is -- yes.**
 15 Q. That is the extent of it?
 16 **A. That is the extent.**
 17 Q. Thank you.
 18 We can take that down, please.
 19 Were you also made aware at this point in time that
 20 the Audi was driving at high speeds and that it was
 21 difficult for the surveillance team to keep tabs on it?
 22 **A. That's correct.**
 23 Q. Did that resonate with you as including the hallmarks of
 24 anti-surveillance?
 25 **A. Anti-surveillance? Possibly. But there were just --**

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1 **A. That the stolen Audi was now moving around the area,**
 2 **that is what confirmed it in my mind.**
 3 Q. Thank you.
 4 Following that, you say:
 5 "The intelligence was proving to be good."
 6 What did you mean by that?
 7 **A. On some operations, we -- nothing happens on some**
 8 **operations. We sit there and nothing happens. But on**
 9 **this particular operation, things were happening, things**
 10 **were developing.**
 11 Q. What intelligence were you referring to when you said it
 12 was proving to be good?
 13 **A. The fact that the vehicle -- the intelligence -- the**
 14 **vehicle was moving.**
 15 Q. That the vehicle was going to be used in the attack?
 16 **A. Yes, sorry.**
 17 Q. All right.
 18 You realised at that point, did you, that that
 19 movement and what was expected to happen thereafter, was
 20 consistent with the intelligence that you had been in
 21 receipt of over the previous few days?
 22 **A. That's correct.**
 23 Q. Right.
 24 That intelligence came from various sources and by
 25 that I mean this. You had been involved in deploying

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1 **they were just driving erratically from memory and that**
 2 **is the information that we were getting from the**
 3 **surveillance team.**
 4 Q. Right. Did it indicate to you that the team inside the
 5 Audi were experienced?
 6 **A. It could have done, possibly. The fact that they were**
 7 **driving at speed. Maybe.**
 8 Q. Would that, in itself, have caused you to reassess your
 9 risk assessment and push it beyond very high, as at the
 10 point of interception?
 11 **A. It would have been another indicator at that time.**
 12 Q. Right. Did the Audi vehicle drive past you at speed at
 13 around this time?
 14 **A. It did. I think we were in Lordship Lane and in**
 15 **slow-moving traffic and it sort of came ... we heard**
 16 **over the surveillance channel that it was coming towards**
 17 **us. There was nothing we could do. We would try and**
 18 **avoid any form of seeing the vehicle at this early**
 19 **stage, because we wouldn't have wanted to compromise the**
 20 **operation.**
 21 Q. What do you mean by that?
 22 **A. So we just would want to avoid any contact with the**
 23 **subject vehicle at this stage.**
 24 Q. Right. Including eye contact as the vehicle is going
 25 past?

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<p>1 A. Indeed.</p> <p>2 Q. Because that was going to be my next question, and to</p> <p>3 ask you whether you managed to have sight of anybody in</p> <p>4 the vehicle?</p> <p>5 A. No.</p> <p>6 Q. In fact, your evidence is that you would deliberately</p> <p>7 avoid that?</p> <p>8 A. Exactly.</p> <p>9 Q. All right.</p> <p>10 This was happening on your way to Quicksilver; is</p> <p>11 that right?</p> <p>12 A. That's correct, sir.</p> <p>13 Q. When you arrived at Quicksilver, did you remain in your</p> <p>14 vehicle with S111 and R116?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Did you remain listening to the information being</p> <p>17 provided over the radio system?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Did you hear intelligence or information coming over</p> <p>20 that system that there were at least three men in the</p> <p>21 vehicle?</p> <p>22 A. Yes. Yes, I did.</p> <p>23 Q. Do you know whether that was limited to three, did you</p> <p>24 hear that two had got in as well as the driver or are</p> <p>25 you able to describe what was heard?</p> <p style="text-align: center;">Page 97</p>	<p>1 A. I think all I could say at this stage is there were at</p> <p>2 least, in my mind, three people in that vehicle.</p> <p>3 Q. At least three?</p> <p>4 A. Yes.</p> <p>5 Q. Possibly four?</p> <p>6 A. Possibly.</p> <p>7 Q. Were you also told that they were wearing hoodies and</p> <p>8 hats, which might in fact be balaclavas?</p> <p>9 A. Yes, that's correct.</p> <p>10 Q. Again, did that demonstrate to you a certain level of</p> <p>11 planning and experience?</p> <p>12 A. Yes. Yes.</p> <p>13 Q. Let's look, please, back at your witness statement SLA6,</p> <p>14 and I am going to ask that we display that document at</p> <p>15 page 7, and that we look at the latter part of</p> <p>16 paragraph 25, so if we can highlight the first paragraph</p> <p>17 on the page, please.</p> <p>18 It is the second line on the page below:</p> <p>19 "We heard that the Audi had stopped in the vicinity</p> <p>20 of White Hart Lane and that two males in dark clothing</p> <p>21 with hoodies up and rolled-up hats on their heads over</p> <p>22 the top of their hoodies had got into the Audi. Whilst</p> <p>23 we were at Quicksilver a comment came over the radio</p> <p>24 that this offence would be firearms enabled. I then</p> <p>25 knew that there were at least three men in the vehicle,</p> <p style="text-align: center;">Page 98</p>
<p>1 with hoodies up and hats on which could be balaclavas,</p> <p>2 ready to carry out the attack on the prison van and that</p> <p>3 the men were armed."</p> <p>4 Given what you had heard from the surveillance team,</p> <p>5 coupled with this radio comment that the offence would</p> <p>6 be "firearms enabled", were you now in any doubt that</p> <p>7 there were experienced men in the Audi vehicle with live</p> <p>8 firearms?</p> <p>9 A. No doubt.</p> <p>10 Q. For the avoidance of doubt, did you take "firearms</p> <p>11 enabled" to mean "live firearms enabled"?</p> <p>12 A. Yes, sir.</p> <p>13 THE CHAIRMAN: Had you heard the expression before?</p> <p>14 A. I don't think I had, sir.</p> <p>15 THE CHAIRMAN: Thank you.</p> <p>16 MS BLACKWELL: Did you have any understanding of the number</p> <p>17 of live firearms that would be in the vehicle?</p> <p>18 A. No. Just that it would be firearms enabled.</p> <p>19 Q. Right. Did you understand the source of that</p> <p>20 information?</p> <p>21 A. I thought that that information would be coming from the</p> <p>22 device in the vehicle.</p> <p>23 Q. Right. So from the occupants themselves?</p> <p>24 A. Yes.</p> <p>25 Q. So it was truly reliable in your mind?</p> <p style="text-align: center;">Page 99</p>	<p>1 A. Yes.</p> <p>2 Q. Did that information affect your risk or threat</p> <p>3 assessment? Did it push it any higher than very high?</p> <p>4 A. It was now probably at the very upper levels now of my</p> <p>5 personal risk assessment and threat assessment.</p> <p>6 Q. Almost at the very top of the scale?</p> <p>7 A. Yes.</p> <p>8 Q. Would it have assisted you to have been informed that</p> <p>9 from 29 October to 11 December the gang had been</p> <p>10 attempting to source real firearms and ammunition?</p> <p>11 A. No.</p> <p>12 Q. Would it have assisted you to know that as of the night</p> <p>13 before, 10 December, intelligence suggested that only</p> <p>14 an imitation firearm had been sourced?</p> <p>15 A. No.</p> <p>16 And the reason for that is that -- an imitation</p> <p>17 firearm, if it is pointed at me or a colleague, is ...</p> <p>18 I am going to treat that as a real firearm until I know</p> <p>19 otherwise. Also, with everything that I knew, they had</p> <p>20 had access to real firearms in the past and that is one</p> <p>21 imitation firearm and there may be other firearms in</p> <p>22 that vehicle as well.</p> <p>23 Q. If you had been told that as of the night before the</p> <p>24 gang, despite their efforts, had only been able to</p> <p>25 source an imitation firearm and the conversation that</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

1 was caught on the probe that morning confirmed that
 2 there was only an imitation firearm in that vehicle,
 3 would that have affected your risk assessment?
 4 **A. We may not -- if it was confirmed, then we may not have**
 5 **even been deployed on that particular operation, if it**
 6 **was confirmed that it was just an imitation firearm.**
 7 Q. So you may have been stood down?
 8 **A. That is a possibility.**
 9 Q. Thank you.
 10 I would like to put up one of the plans that you
 11 prepared in your bundle, MPS3438, page 4, please. And
 12 use this, please, for you to demonstrate the route that
 13 you took in your vehicle from Quicksilver to the next
 14 point of where you paused at Lordship Lane.
 15 **A. From memory, we turned into Mayes Road, so --**
 16 Q. Is that the road in yellow?
 17 **A. Yes, that is the road in yellow, to the roundabout and**
 18 **then right into Station Road, which takes you towards**
 19 **the High Road and Lordship Lane.**
 20 Q. Right.
 21 **A. We would have crossed over into Lordship Lane and then,**
 22 **again from memory, I think we held somewhere in between**
 23 **the Crown Court and probably just to the right of where**
 24 **my blue circle is.**
 25 Q. So between the "O" and the "R" on the word "Lordship"?

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1 **A. -- and just give us some more information about the**
 2 **position of the Audi.**
 3 Q. Of the vehicle.
 4 Because I am going to suggest that, by this time,
 5 you must have appreciated from information that was
 6 coming through to you on the police radio, on your
 7 channel, that the vehicle had been stationary in
 8 Bracknell Close for some time, for at least half
 9 an hour.
 10 **A. Okay.**
 11 Q. Do you recollect that that was the state of affairs?
 12 **A. I knew -- I know that it was positioned in Bracknell**
 13 **Close, I am unsure of the time that it was there for.**
 14 Q. All right. Was there any discussion about the manner in
 15 which the interception would take place, if the vehicle
 16 remained where it was?
 17 **A. A possible -- no, I am ...**
 18 **Yes, I am sure we would have discussed the fact that**
 19 **it was going to be a vehicle interception and**
 20 **an extraction.**
 21 Q. Right. Who made that decision?
 22 **A. S111.**
 23 Q. Was that a decision made within your vehicle?
 24 **A. No, I am -- no, that would have been a decision that he**
 25 **would have made with S105.**

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1 **A. Possibly, yes, but we did hold in Lordship Lane for**
 2 **a little while.**
 3 Q. When you say you held in Lordship Lane, was that you and
 4 the other vehicles, Alpha, Bravo, Charlie and the
 5 Control vehicle?
 6 **A. Yes, that's correct.**
 7 Q. It was S111 who was tasked with the role of OFC, wasn't
 8 it?
 9 **A. So he was the OFC in the Alpha vehicle. We also had**
 10 **S105 who was the team OFC.**
 11 Q. In the Control vehicle?
 12 **A. In the Control vehicle.**
 13 Q. Yes.
 14 What discussion was taking place in your vehicle at
 15 this time about the possible manner in which the
 16 interception might take place?
 17 **A. At this stage -- sorry, the manner?**
 18 Q. The manner, the way in which the interception might take
 19 place, how you were going to approach the vehicle and
 20 what was going to happen. Was there any discussion
 21 along those lines?
 22 **A. I can't remember if there was any discussion at this**
 23 **point. I think at this stage we had held so that the**
 24 **surveillance team could get down into Bracknell Close --**
 25 Q. Yes.

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1 Q. Right, so was there discussion taking place, either by
 2 radio or mobile phone, between S111 in your vehicle and
 3 S105 in the Control vehicle?
 4 **A. Yes.**
 5 Q. What was that conversation?
 6 **A. I can't remember, I am sorry.**
 7 **I would have been listening to the surveillance**
 8 **commentary as well.**
 9 Q. Following that conversation, what discussion took place
 10 in your vehicle between S111, R116 and yourself? In
 11 terms of the plan or the form that the interception
 12 would take?
 13 **A. So I am sure that we spoke about the position of the**
 14 **vehicles, should the Audi be in that position when we**
 15 **drove around into Bracknell Close, that we would go past**
 16 **the vehicle, the Bravo Car would stop in front of it and**
 17 **the Charlie Car would then stop behind that vehicle and**
 18 **then we would deploy from those vehicles.**
 19 Q. All right, so that covers the positioning of the
 20 vehicles in order to block the Audi in, prevent its
 21 escape and provide a position that the Audi was in, from
 22 which you would get out of your vehicles and intercept
 23 and extract the occupants.
 24 Was there discussion between you and your colleagues
 25 in your vehicle as to how many occupants were in the

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1 Audi?
 2 **A. I think at this stage we had received information that**
 3 **someone may have got out of the vehicle and been**
 4 **a lookout or a third eye. So possibly three people**
 5 **still in that vehicle, in the Audi.**
 6 Q. Three, but possibly four as well?
 7 **A. Yes.**
 8 Q. All right.
 9 Were you aware that there were nine firearms
 10 officers in three vehicles who would be expected to
 11 deploy on that vehicle, on the Audi?
 12 **A. Yes.**
 13 Q. Yes.
 14 Did you realise that in relation to those three
 15 vehicles, it was likely that the drivers of the vehicles
 16 would deploy at a slower rate than the officers
 17 positioned in the front passenger seat and the rear of
 18 the vehicles?
 19 **A. Yes. Yes, because they have to obviously stop the**
 20 **vehicle, apply the brake and then get out.**
 21 Q. Yes, and so in your mind, as you were waiting in
 22 Lordship Lane, were you thinking about the configuration
 23 of the six officers who would initially get out of those
 24 three vehicles and the positions around the Audi that
 25 they would take up?

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1 **A. It mightn't, sir.**
 2 THE CHAIRMAN: That is why Ms Blackwell is asking: what is
 3 the down side?
 4 **A. We are not taught to make plans, we -- sorry, we are not**
 5 **taught to decide which side of the vehicle to go to, we**
 6 **deploy to the sort of nearest side that we can, or where**
 7 **there is a gap that needs filling.**
 8 MS BLACKWELL: Right, so on every deployment, and indeed in
 9 accordance with your training, it is done on instinct
 10 when you get to the vehicle, as to where you think you
 11 are most likely to be useful?
 12 **A. Sorry, I would -- it is not ... instinct?**
 13 Q. Can I suggest instinct together with experience?
 14 What I am trying to establish, I know that you are
 15 finding it difficult and I am finding it difficult to
 16 find the right words as well, but there is ... never in
 17 your experience has there been any plan in an approach
 18 to a deployment such as this? It is all done on the
 19 spur of the moment as to what is in each individual
 20 officer's mind --
 21 **A. Sorry, you might have an idea of which side of the**
 22 **vehicle you would go to, but maybe not which door --**
 23 Q. Right.
 24 **A. -- or where you actually end up.**
 25 Q. In this situation, holding on Lordship Lane, was there

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1 **A. I don't think we were considering the positions, because**
 2 **it is a -- it is quite a fluid tactic, in that if**
 3 **something had changed quickly we would have had to**
 4 **deploy to a different side of the vehicle, maybe.**
 5 **So all we may have discussed was that I was going to**
 6 **get out of the rear vehicle and then close down the**
 7 **vehicle and then as you are closing down, it is at that**
 8 **point that you sort of make a decision as to which side**
 9 **of the vehicle you would go to.**
 10 Q. So up until the point of reaching the vehicle itself,
 11 none of the firearms officers had any plan as to where
 12 on that vehicle they were going to deploy?
 13 **A. That is correct, sir.**
 14 Q. Whilst appreciating the need to remain dynamic and
 15 fluid, what would have been wrong with the officers in
 16 your vehicle speaking to the officers in the Bravo and
 17 Charlie vehicle and formulating a plan, an initial plan,
 18 as to which officers were going to go to which side of
 19 the vehicle?
 20 **A. There would be nothing wrong with it, but the vehicle**
 21 **could -- it could move, just as we come round the**
 22 **corner.**
 23 **So that is probably why we -- when we deploy, we are**
 24 **fluid and we fill gaps.**
 25 THE CHAIRMAN: But it might not move?

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1 any discussion as to which side of the vehicle you were
 2 going to take?
 3 **A. Not from my recollection.**
 4 Q. Right.
 5 So although in your experience there is sometimes
 6 discussion of that nature, there was no discussion on
 7 this occasion?
 8 **A. That is from my recollection.**
 9 Q. Right.
 10 Whilst you were holding in Lordship Lane, did you
 11 appreciate how close the passenger side of the Audi was
 12 to the vehicle next to it?
 13 **A. No.**
 14 Q. Had you been given any information about the fact that
 15 there was only 18 inches or so between the two vehicles?
 16 **A. No.**
 17 Q. If you had have been given that information, would that
 18 have caused you to begin a conversation with the other
 19 officers in your vehicle, perhaps as to how that might
 20 limit your ability to extract those inside the vehicle?
 21 **A. Yes. If there was limited room on one side, then we**
 22 **might have to adjust our sort of positions.**
 23 Q. But you had no idea that that was the position?
 24 **A. No, I had no idea.**
 25 Q. Although in answer to questions from the chair you said

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1 that the vehicle might have moved by the time you
 2 entered Bracknell Close, certain it was that when your
 3 vehicle came to a stop you had no concern that the Audi
 4 was going to move, because you chose not to take the
 5 Benelli shotgun with you. The reason for that was
 6 because you did not consider it necessary to shoot
 7 Hatton rounds into the tyres of the vehicle to prevent
 8 it from escaping?
 9 **A. That is -- yes, I didn't take ... but I wanted my**
 10 **primary weapon to be my MCX.**
 11 Q. I would like to ask you about that.
 12 Is that because you considered the level of risk
 13 that you were facing as being so high that you wanted
 14 the opportunity to have two weapons at your disposal,
 15 your carbine and your Glock?
 16 **A. That's correct, sir.**
 17 Q. That would necessarily mean that you would have to leave
 18 the Benelli shotgun behind?
 19 **A. I could have taken it, it could have been slung around**
 20 **me, but the Benelli is quite an unwieldy piece of**
 21 **equipment, so I decided to leave it in the vehicle, sir.**
 22 Q. Did you discuss that decision with those in your
 23 vehicle?
 24 **A. Yes, I did.**
 25 Q. Did they approve of it?

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1 this part of the video will not be published online.
 2 Those present and following online are reminded not to
 3 report that part of the evidence.
 4 THE CHAIRMAN: Noted, with thanks.
 5 MS BLACKWELL: Thank you.
 6 I understand also that before you rise, sir, my
 7 learned friend Mr Butt would like to make a oral
 8 application.
 9 I don't know its nature.
 10 MR BUTT: Unusually I think this one is going to be welcomed
 11 by everyone.
 12 THE CHAIRMAN: There is always a first time, Mr Butt.
 13 MR BUTT: Yes.
 14 Application by MR BUTT
 15 MR BUTT: In June, we provided to your team various training
 16 individuals which show how various armed policing
 17 tactics are implemented in an ideal scenario. There has
 18 been a request for those to be disclosed.
 19 If those videos were released in the public domain,
 20 they could obviously be of assistance to those seeking
 21 to evade police tactics, including in particular to
 22 terrorists. Our proposal is to deal with this swiftly,
 23 they be covered by a type 2 restriction order, so they
 24 are available for inspection by CPs, including of course
 25 the family and the family's legal representatives, they

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1 **A. Yes.**
 2 Q. In your experience, is it usual for nobody to take
 3 a Benelli shotgun on to a vehicle extraction or does it
 4 depend on the circumstances.
 5 **A. It depends on the circumstances.**
 6 MS BLACKWELL: Sir, I am going to move in a moment to state
 7 amber and to the interception itself. I know it is
 8 a little early, but it might be a convenient time to
 9 pause.
 10 THE CHAIRMAN: No, it is inevitable that these sessions --
 11 the length of the sessions are determined by the topics
 12 which you can cover and it is much better that we break
 13 at a time when we are at the end of one topic or one
 14 chapter, rather than interrupting it part way through.
 15 MS BLACKWELL: Thank you.
 16 Before you rise, sir, may I just mention something
 17 about evidence that was given over the course of this
 18 morning's session. It was about this witness's
 19 understanding of the source of some intelligence that he
 20 received prior to 11 December.
 21 THE CHAIRMAN: Yes.
 22 MS BLACKWELL: This was before the morning break.
 23 Having considered the matter, the inquiry team
 24 believe that this was given in breach of an existing
 25 restriction order and the transcript will be edited and

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1 can then be played, but they would be played in a closed
 2 session. We will provide a draft order to you. The
 3 application is being made orally in order to facilitate
 4 the earliest possible disclosure of the content to the
 5 family. We will not be able to make them available on
 6 Steelnet, because the technology only allows a direct
 7 download, but we will all work together to find a way.
 8 They are short videos.
 9 THE CHAIRMAN: Very good.
 10 MR BUTT: They can be played.
 11 THE CHAIRMAN: That seems sensible.
 12 Ms Blackwell, anything to say?
 13 MS BLACKWELL: No.
 14 THE CHAIRMAN: I will make the order that you request.
 15 MR BUTT: Thank you, sir.
 16 THE CHAIRMAN: Very good, and I am assuming everybody
 17 agrees.
 18 Shall we say 1.50.
 19 MS BLACKWELL: Could we have an hour, please, could we say
 20 1.55?
 21 THE CHAIRMAN: Sure, easily persuaded.
 22 1.55 it is.
 23 Thank you.
 24 (12.57 pm)
 25 (The Luncheon Adjournment)

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1 (2.10 pm)
 2 W80 (continued)
 3 Questions from MS BLACKWELL (continued)
 4 THE CHAIRMAN: Yes.
 5 MS BLACKWELL: Thank you, sir.
 6 Before lunch, we were reaching the stage at which
 7 your vehicles were approaching and driving down
 8 Bracknell Close.
 9 **A. Yes.**
 10 Q. I was asking you about discussions that might have taken
 11 place in your vehicle at that time, any plan that might
 12 have been hatched or any instructions that were given
 13 between you.
 14 I think I summarise your evidence fairly in saying
 15 that your answer to that was that there wasn't a plan,
 16 because firearms operations are inherently dynamic and
 17 they require you to be flexible, which is something that
 18 you are trained to do.
 19 **A. That's correct.**
 20 Q. The inquiry has heard from S111 that at least part of
 21 the intention in driving down Bracknell Close was to do
 22 so in a way that did not alert the subjects in the
 23 vehicle that you were coming.
 24 **A. That's correct.**
 25 Q. Do you agree with that?

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1 As highlighted in contain and call out above, if the
 2 subject is removed from a motorcycle, there is
 3 a likelihood that the motorcycle will fall over,
 4 although this is likely to cause damage to the vehicle,
 5 and it also poses a hazard to persons around the bike,
 6 especially if a subject is being dominated on the ground
 7 in the immediate vicinity. Deploying officers should
 8 dynamically assess the risk when implementing the option
 9 matched against the perceived or actual threat."
 10 That paragraph as far as it relates to motorcycles
 11 is not relevant, but the final sentence is:
 12 "Deploying officers should dynamically assess the
 13 risk when implementing the option matched against the
 14 perceived or actual threat."
 15 That has to be done in quick time by you on the
 16 spot, doesn't it?
 17 **A. Yes, that's correct, sir.**
 18 Q. Right:
 19 "The same principles regarding the line of approach
 20 should be borne in mind as detailed in content 2,
 21 approaching a stationary vehicle on foot. When
 22 conducting an extraction, there are two general
 23 responsibilities in relation to each subject 'Cover' and
 24 'Approach'. This should include a cover officer and
 25 an approach officer, however there may be environmental

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1 **A. Yes, I do.**
 2 Q. Is that something that you discussed within your
 3 vehicle?
 4 **A. Yes, it is.**
 5 Q. Right.
 6 When you reached your destination, when your vehicle
 7 stopped, as the first in a line of three together, with
 8 the Control Car behind, were you then aware that, as you
 9 got out of the vehicle, according to your training, you
 10 would need two officers per occupant of the vehicle, in
 11 order for one to provide firearms cover and the other to
 12 perform an extraction?
 13 **A. That's correct.**
 14 Q. Right, I would just like to look, please, at that
 15 training. It is at COP14, page 13, please, Mr Coates.
 16 I am going to read through the paragraph that is
 17 headed "Extraction", are you able to see that?
 18 **A. Yes.**
 19 Q. Yes:
 20 "An extraction is a tactical option whereby the
 21 subjects are removed from the vehicle by officers who
 22 move forward and physically take hold of them. The
 23 purpose of an extraction is to minimise risk, to both
 24 the subject and the officers, preserve evidence and
 25 rapidly gain control, thereby neutralising any threat.

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1 or other constraints which limit the number of officers
 2 deployed. In such circumstances, a prioritisation of
 3 roles will be required and an officer may perform a dual
 4 role of cover and approach."
 5 All right, so does that accurately reflect your
 6 level of knowledge as to in an ideal situation what
 7 would be required, a cover officer and an approach
 8 officer?
 9 **A. Yes, that's correct, sir.**
 10 Q. Thank you, we can take that down, please.
 11 You are trained first to close down the vehicle, get
 12 firearms cover and then for the next officers who arrive
 13 at the vehicle to look for gaps in the tactics and see
 14 where they are needed and what role they are needed to
 15 perform?
 16 **A. Yes, that's correct.**
 17 Q. Okay.
 18 This vehicle had been stationary for a period of
 19 approaching an hour at the time that you got out of your
 20 vehicle in Bracknell Close. Does that indicate to you
 21 that there was less of a need to be dynamic, because the
 22 vehicle was stationary and was not likely to move,
 23 particularly as your vehicles had blocked it in?
 24 **A. In -- in my view we still needed to be dynamic and close**
 25 **the vehicle down.**

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1 Q. But knowing that the vehicle was stationary, and knowing
 2 that you had blocked it in, would there at that stage
 3 before you got out of the vehicle, have been
 4 an opportunity for your vehicle to communicate with the
 5 other two vehicles and to provide the officers with
 6 particular roles as they were approaching that vehicle?
 7 **A. No, there wouldn't have been that opportunity to do**
 8 **that.**
 9 Q. Because of time?
 10 **A. Yes.**
 11 Q. Could that conversation, that communication, have taken
 12 place as you were stationary on Lordship Lane, knowing
 13 as you did at that stage that the Audi vehicle was still
 14 in the position that it had been for approaching
 15 an hour?
 16 **A. The tactic for an extraction is to rapidly close down**
 17 **the vehicle and dominate the occupants of that vehicle,**
 18 **and that was the tactic that we deployed.**
 19 Q. We established before lunch that there were nine
 20 available firearms officers in the three vehicles, but
 21 that the three drivers would be getting out,
 22 understandably, at a slower pace than the others in the
 23 vehicle, so that gives six officers rapidly approaching
 24 the Audi vehicle?
 25 **A. Yes.**

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1 strike to be given?
 2 **A. So I would have put the sling of my weapon around my**
 3 **shoulder.**
 4 Q. Yes. Keeping it below the line of the window --
 5 **A. That's right.**
 6 Q. -- conscious that you didn't want to indicate to anybody
 7 that you had a firearm on you?
 8 **A. That's correct, sir.**
 9 Q. Yes.
 10 **A. And I would have made -- got ready my high-visibility**
 11 **cap, ready to put that on but I would not have put it on**
 12 **at that stage.**
 13 Q. Until you went into Bracknell Close?
 14 **A. That's correct.**
 15 Q. Right.
 16 What about the state of your carbine weapon, was it
 17 put into condition 1, or state 1?
 18 **A. Yes, it is already in condition 1, so it is already**
 19 **loaded and what we term made ready, so it is ready to**
 20 **go.**
 21 Q. What do you mean by "made ready"?
 22 **A. So there is -- a round is chambered into the weapon from**
 23 **the magazine.**
 24 Q. Right.
 25 **A. So it is ready to go.**

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1 Q. A vehicle in which, as far as you were aware, there
 2 might have been four occupants?
 3 **A. Yes.**
 4 Q. Was there any discussion by anybody about how six
 5 officers were going to control and contain four
 6 occupants, when you needed two firearms officers per
 7 occupant of the vehicle?
 8 **A. No, there wasn't, but the six initial officers would**
 9 **have been able to control the occupants pending the**
 10 **arrival of the other -- of the three drivers.**
 11 Q. You are giving that evidence now, is that something
 12 which was discussed or is that something you are telling
 13 us from your experience and training?
 14 **A. No, that is from my experience and training but that --**
 15 **it was not discussed.**
 16 Q. There was no discussion about which officers would be
 17 control officers, which officers would be approach
 18 officers and the position on the vehicle to which those
 19 officers would go?
 20 **A. There was no discussion.**
 21 Q. You became aware that state amber was being called. Was
 22 that before your vehicles entered Bracknell Close?
 23 **A. Yes.**
 24 Q. Right.
 25 How did you ready yourself for state red or the

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1 Q. Was there any additional step that you needed to take in
 2 order to fire that weapon, other than pulling the
 3 trigger?
 4 **A. There is a selector lever on the side of the weapon that**
 5 **I would have had to switch to fire. So it would have**
 6 **been on safe in the vehicle and then you need to switch**
 7 **it to fire.**
 8 Q. Are you able to explain to the inquiry the precise time
 9 at which you switch that weapon to fire?
 10 **A. It would have been when I exited our vehicle.**
 11 Q. Right. As you got out of the vehicle?
 12 **A. Yes, that's correct.**
 13 Q. As you came into Bracknell Close, you were aware of what
 14 you describe in your witness statement as the exact
 15 location of the vehicle.
 16 Did you know that there was another vehicle parked
 17 next to it, the silver BMW?
 18 **A. I don't think we had been told that information.**
 19 Q. Before lunch we established that you didn't know the
 20 proximity of that vehicle to the Audi, but is it your
 21 evidence that you were not even told that there was
 22 a vehicle parked next to it?
 23 **A. I can't remember if I was told that or not, sorry.**
 24 Q. If you had have been told that there was a vehicle
 25 parked alongside the Audi, would it have been important

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1 for you to have established how close?
 2 **A. It may have altered the -- if it was very close, it may**
 3 **have altered the tactic used, yes.**
 4 THE CHAIRMAN: Is it a reasonable assumption that, if in the
 5 course of communication, your team had been told that
 6 there was a vehicle parked adjacent to the Audi, that
 7 someone would have said "how close?"
 8 **A. Yes, sir, that is a reasonable assumption.**
 9 THE CHAIRMAN: From which it is reasonable to assume that
 10 you were not aware that there was a vehicle parked next
 11 to it?
 12 **A. Yes, sir.**
 13 THE CHAIRMAN: Thank you.
 14 MS BLACKWELL: You were aware that the surveillance officer
 15 who had been on Bracknell Close shortly before you
 16 arrived had indicated that the windscreen on the Audi
 17 was steamed up?
 18 **A. That's correct.**
 19 Q. You assumed that that also meant the windows were
 20 steamed up?
 21 **A. Yes.**
 22 Q. That was good news and bad news, wasn't it? Good news
 23 in the sense that it increased the chance of
 24 a successful silent approach, because the occupants
 25 would not see you?

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1 Under "Points to cover", after there are four bullet
 2 points relating to rationale, we can see in the middle
 3 of points to cover:
 4 "All windows except windscreen will smash, because
 5 front windscreen is laminated."
 6 Were you aware that if one of you had sought to take
 7 the life hammer window breaker that you had available to
 8 you, and had chosen that implementation to smash the
 9 window, that there was every likelihood that that would
 10 have been successful?
 11 **A. The side windscreen -- sorry, the side window?**
 12 Q. The windows at the side?
 13 **A. Yes, the life --**
 14 Q. Did you have one available to you?
 15 **A. No.**
 16 Q. Are these implements not allocated personally to police
 17 officers?
 18 **A. They are.**
 19 Q. Where was yours?
 20 **A. I think it was probably in our vehicle, but --**
 21 Q. I am so sorry, I interrupted you.
 22 **A. Yes, it was in our vehicle.**
 23 Q. Had you brought it with you?
 24 **A. Yes, I have a bag with some equipment in that I always**
 25 **take with me, so it would have been in that bag.**

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1 **A. Yes.**
 2 Q. But bad news, because it decreased your chance of seeing
 3 into the vehicle and identifying how many occupants were
 4 in there before you were extremely close?
 5 **A. That's correct.**
 6 Q. In fact before the doors were opened.
 7 **A. Yes.**
 8 Q. Did you and the occupants of your vehicle discuss the
 9 implications of the windows being steamed up before you
 10 exited your vehicle?
 11 **A. No, we didn't.**
 12 Q. If you had have discussed the implications, do you think
 13 that it would have occurred to you that somebody might
 14 have needed to smash the windows?
 15 **A. Yes.**
 16 Q. Were you trained in smashing windows with what I am
 17 going to describe as a life hammer window breaker?
 18 **A. Yes, certainly.**
 19 Q. Let's just take a look for a moment, please, at the
 20 Metropolitan Police special training centre
 21 documentation at IPC217. If we can just identify this
 22 document, it is a training document relating to vehicle
 23 interception window breaking.
 24 Can we go to the next page, please, and the next
 25 page. Thank you.

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1 Q. Was there any discussion between you or your two
 2 colleagues in your vehicle about at least one of you
 3 taking a window breaker?
 4 **A. No, there wasn't, sir.**
 5 Q. Could I ask that this document is taken down and
 6 replaced by MPS4408, page 11.
 7 Again, this is another document from the
 8 Metropolitan Police Specialist Training Centre,
 9 demonstrating the officer who is closest to the camera
 10 wearing his window breaker around his wrist. Do you see
 11 that?
 12 **A. Yes.**
 13 Q. Did your window breaker have a wrist strap?
 14 **A. Yes, I think it did have a wrist strap.**
 15 Q. Whilst I am sure there is an understanding that in terms
 16 of the number of weapons that you would carry to
 17 an interception, you are limited by the number of hands
 18 that you have, there was nothing to prevent you from
 19 having taken your window breaker on your wrist, as we
 20 can see demonstrated in this photograph, was there?
 21 **A. Other than the fact that I would always try and have two**
 22 **hands on my weapon and to use a window breaker you have**
 23 **to take a hand off the primary weapon.**
 24 Q. Was that the reason that you didn't take it with you?
 25 **A. That is correct.**

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1 Q. So that thought process was something that you engaged
 2 in before you got out of the vehicle?
 3 **A. Yes.**
 4 THE CHAIRMAN: You made a conscious decision not to take it?
 5 **A. Yes, sir.**
 6 THE CHAIRMAN: Yes.
 7 MS BLACKWELL: We can take that down, please.
 8 As you entered Bracknell Close, and before you got
 9 out of your vehicle, what was your risk assessment and
 10 your threat assessment, what level had it reached?
 11 **A. It was the top end of very high.**
 12 Q. You put on your hat and your ear defenders?
 13 **A. That's correct, sir.**
 14 Q. You had your carbine weapon in your hand?
 15 **A. Yes.**
 16 Q. You had your Glock as your secondary weapon?
 17 **A. Yes.**
 18 Q. And you got out of your vehicle from the rear offside
 19 door, the driver's side?
 20 **A. Yes.**
 21 Q. Why did you get out of that side rather than the
 22 passenger side that was closer to the Audi?
 23 **A. Because that is the -- we generally sit in that**
 24 **configuration and I was near to that door and that is**
 25 **the door I got out of. It is the nearest door to me.**

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1 Q. How soon after you got out of your vehicle did you begin
 2 to shout verbal commands?
 3 **A. Straight away.**
 4 Q. As you were running towards the Audi vehicle, were you
 5 surprised by its proximity to the silver BMW next to it?
 6 **A. I can't really remember anything about what was on that**
 7 **side of the Audi.**
 8 Q. It did provide a difficulty, didn't it, the proximity,
 9 because as we have established --
 10 **A. Yes.**
 11 Q. -- there was only 18 inches between the two vehicles, so
 12 as you are running towards the Audi vehicle, did you
 13 think, "That is very close and that is going to impede
 14 me opening the passenger door"?
 15 **A. I didn't. At that time, no.**
 16 Q. Did you give any thought to the difficulty that you
 17 might have extracting somebody in that very small space?
 18 **A. Not at that time, no.**
 19 Q. How was your visibility into the vehicle as you
 20 approached it?
 21 **A. There was -- the front windscreen was steamed up, I had**
 22 **no visibility into the vehicle.**
 23 Q. When did you make the decision to go to the front
 24 passenger side?
 25 **A. As I was -- as I got out and looked at the vehicle,**

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1 Q. Which meant that you had to run around the back of your
 2 vehicle in order to approach the Audi?
 3 **A. Yes.**
 4 Q. As your vehicle was entering Bracknell Close, did you
 5 understand that the Audi was going to be on the
 6 left-hand side or the nearside of your vehicle?
 7 **A. Yes.**
 8 Q. Is there any reason why you didn't move across so you
 9 could get out of the door that was closest to the
 10 vehicle?
 11 **A. There may have been equipment on the rear seat that**
 12 **prevented me getting across to that door, sir.**
 13 Q. Did you go through the thought process of whether or not
 14 you should have got out of the other door, the nearside
 15 door?
 16 **A. No, that is -- I just reacted and got out of that**
 17 **offside door.**
 18 Q. Right.
 19 As you got out of the vehicle or you were getting
 20 out of the vehicle, you have explained that you move the
 21 selector lever on your carbine weapon to what?
 22 **A. To the fire position.**
 23 Q. Right. At that point, all that it will take for you to
 24 fire the weapon is for you to pull the trigger?
 25 **A. That's correct, sir.**

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1 **I could see S111 in front of me, in my peripheral vision**
 2 **I could see other officers going down to what would be**
 3 **the driver's side, so I followed S111 down to the**
 4 **nearside.**
 5 Q. Right.
 6 It was a split-second decision based upon your
 7 understanding of where other officers were --
 8 **A. Yes.**
 9 Q. -- and where you would be most needed?
 10 **A. That's correct.**
 11 Q. I would like to take a moment just to consider your
 12 state of mind at that point, as you reached the Audi.
 13 I am going to ask that we look, please, at SLA6. This
 14 is your witness statement that lies behind divider 8 and
 15 paragraph 30, please, which is at page 8.
 16 Could we highlight, please, the top third of that
 17 page, Mr Coates. Or zoom in on -- thank you.
 18 Right, I am going start from five lines down:
 19 "I got out of the offside rear passenger door.
 20 I moved around the rear of our vehicle and I started to
 21 move down the nearside of the Audi. I thought we were
 22 going to get shot. I believed that the occupants had
 23 firearms, probably machine pistols, they were
 24 experienced and they were intending to attack a prison
 25 van and break free a dangerous criminal and I believed

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1 the occupants would fight their way out rather than
 2 surrender."
 3 Why did you think that you were going to get shot?
 4 **A. Because of the information that I had regarding the**
 5 **people in this vehicle.**
 6 Q. Had you been told of any previous occasion upon which
 7 any member of this gang had shot at a police officer?
 8 **A. I am pretty sure that I recall an incident where a TSG,**
 9 **a Territorial Support Group, van was shot at by a team**
 10 **up in -- up in the Tottenham area, but I can't be sure**
 11 **that it was this gang.**
 12 Q. Have you ever mentioned that before in any of your eight
 13 witness statements?
 14 **A. No.**
 15 Q. Can I suggest to you that, as of 11 December, as you are
 16 approaching that vehicle, you were unaware of any
 17 previous incident in which any member of this group,
 18 this organised crime network, had ever shot at a police
 19 officer? Does that accurately reflect your state of
 20 mind at the time?
 21 **A. Yes.**
 22 THE CHAIRMAN: Thank you.
 23 MS BLACKWELL: I am just going to repeat the sentence which
 24 we finished with here:
 25 "I believed that the occupants had firearms,

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1 Q. But surely, wouldn't it take intelligence or information
 2 in the positive that they would be likely to fight their
 3 way out, to get you to that state of mind?
 4 **A. With everything that I had been told that -- I believed**
 5 **that they would try and fight their way out.**
 6 Q. Did you know the circumstances of the arrest of
 7 Izzet Eren and Erwin Amoyaw Gyamfi on 13 October, when
 8 they were stopped with the Skorpion machine pistol and
 9 the other weapon?
 10 **A. Yes.**
 11 Q. Yes.
 12 **A. Yes.**
 13 Q. Did they attempt to fight their way out from arrest on
 14 that occasion?
 15 **A. No, sir.**
 16 Q. No. Could we go back, please, to SLA6, behind tab 8,
 17 and to paragraph 78, which is at page 19.
 18 It is the bottom paragraph, please, Mr Coates:
 19 "I am asked if I have ever known the members of the
 20 OCN to engage or shoot at police officers. The short
 21 answer to this question is no. But we are trained to be
 22 prepared to react to whatever threat we face, from no
 23 threat to a threat to life."
 24 Then you go on to talk about the one occasion where
 25 you understand there has been an incident where shots

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1 probably machine pistols, they were experienced and they
 2 were intending to attack a prison van and break free
 3 a dangerous criminal and I believed the occupants would
 4 fight their way out rather than surrender."
 5 I would like to replace this with IPC1075, which is
 6 a previous witness statement that is at tab 5 in our
 7 bundle, and go to page 2, please. Thank you.
 8 Could we highlight the bottom paragraph, four lines
 9 down:
 10 "I do not recall being told that there was any
 11 intelligence as to how the gang might react on being
 12 confronted by armed police and I assume therefore that
 13 in the absence of any intelligence that they would be
 14 likely to fight their way out rather than surrender."
 15 I am just going to repeat that:
 16 "I do not recall being told that there was any
 17 intelligence as to how the gang might react on being
 18 confronted by armed police and I assume therefore that
 19 in the absence of any intelligence that they would be
 20 likely to fight their way out rather than surrender."
 21 Can you explain what you meant by that, please?
 22 **A. I had been told these were dangerous individuals, I had**
 23 **been told that. My perception was that on confronted by**
 24 **armed police that they wouldn't surrender and they would**
 25 **try and fight their way out.**

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1 have been fired at the police, that related to
 2 an offence in Park Royal in 2007, which was
 3 a significant time before December 2015, and did not
 4 involve a member of this OCN, did it?
 5 **A. No, sir.**
 6 Q. No.
 7 How many armed interceptions and extractions had you
 8 been involved in as at 11 December 2015?
 9 **A. I really don't know, sorry. I have been involved in**
 10 **them, but I wouldn't be able to put a figure on it,**
 11 **sorry. Over the nine years that I have been**
 12 **operational, 20, 30 at least, I would think.**
 13 Q. At least 30?
 14 **A. At least.**
 15 Q. How many of those involved extractions from vehicles?
 16 **A. Most of them.**
 17 Q. How many of those involved extractions from vehicles of
 18 occupants in possession of live firearms?
 19 **A. I have -- I don't know, sorry.**
 20 Q. Any?
 21 **A. Live firearms?**
 22 Q. Yes.
 23 **A. Yes.**
 24 Q. More than one?
 25 **A. Yes, more than one.**

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1 Q. More than 10?
 2 **A. I don't know, sorry.**
 3 Q. Did any of those involve occupants fighting their way
 4 out with those live firearms?
 5 **A. No.**
 6 Q. There were nine armed police officers approaching this
 7 vehicle. What was it that persuaded you so vehemently
 8 that the occupants would attempt to fight their way out?
 9 **A. Just the nature of the information that I had been**
 10 **given.**
 11 Q. What information?
 12 **A. That -- all of the information that I had been given**
 13 **over the week leading up to that --**
 14 Q. The intelligence picture?
 15 **A. Sorry, the intelligence picture.**
 16 Q. You formed that view before you even had sight of
 17 anybody inside that vehicle?
 18 **A. Yes, sir.**
 19 Q. Did it occur to you that the occupants of the vehicle
 20 might be relaxed or sleeping?
 21 **A. No.**
 22 Q. In your mind, was there any connection between the fact
 23 that this gang might have been prepared to use weapons
 24 to threaten the Serco staff, with the fact that they
 25 would be prepared to shoot a police officer?

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1 door?
 2 **A. I may have tried the door first, the issue being that**
 3 **there was no vision into the vehicle and we want to get**
 4 **vision in, as quickly as we can, sir.**
 5 Q. Is it, in your experience, quicker to open a door or
 6 smash a window to obtain vision?
 7 **A. Open a door.**
 8 Q. Right.
 9 At what stage did you activate the laser light on
 10 your carbine weapon?
 11 **A. I am sure that would have been activated as I was**
 12 **approaching the vehicle.**
 13 Q. Is that activated to assist in your aim if you are to
 14 fire the weapon, or does it have some other purpose?
 15 **A. It is to assist with my aim.**
 16 Q. So as you were approaching the vehicle, were you
 17 expecting to fire your weapon?
 18 **A. No, I was using my weapon to protect myself, I wasn't**
 19 **expecting to fire it, but I had the laser system on to**
 20 **assist, should I have to.**
 21 Q. If S111 had succeeded in smashing the window as you were
 22 coming up behind him, what would have been your relative
 23 roles, one to the other?
 24 **A. We would still want to get vision into the rear of that**
 25 **vehicle, so I may have still, having got vision into the**

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1 **A. Yes, that would have been in my mind.**
 2 Q. Do you accept that there is a difference between those
 3 two scenarios? Threatening a custodian with a firearm,
 4 as opposed to shooting a police officer with a firearm?
 5 **A. I accept that there is a difference, yes.**
 6 Q. We can take that down, please.
 7 One of the first things that happened as you
 8 approached that vehicle was you seeing S111 attempting
 9 to break the front passenger side window with the butt
 10 of his firearm; is that right?
 11 **A. With the muzzle.**
 12 Q. With the muzzle of his firearm, my mistake.
 13 **A. Yes, sir.**
 14 Q. I am going to suggest he tried to do that four times,
 15 but was unsuccessful. Do you agree with that?
 16 **A. Yes.**
 17 Q. Three or four times?
 18 **A. Yes, sir.**
 19 Q. Yes.
 20 Do you know why he didn't attempt to open the car
 21 door?
 22 **A. No, I don't. That is the first I saw was he was trying**
 23 **to smash the window.**
 24 Q. If you had been in his position, first to the vehicle,
 25 would you have sought to smash the window or open the

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1 **vehicle through the smashed front window, I may well**
 2 **have still asked him to move down to cover the rear and**
 3 **then I would have taken over his position at the front**
 4 **window.**
 5 Q. But you would have made sure, would you, that you were
 6 on the other side of the door?
 7 **A. I would have stayed on the -- towards the front of that**
 8 **door, looking in, through the smashed window.**
 9 Q. I would just like to pause in the chronology and take
 10 a look now at another piece of training documentation
 11 from the Metropolitan Police. It is at IPC219. We can
 12 see that this is, "Subject: extraction from motor
 13 vehicles, refresher course", page 4, please.
 14 Which is where we find the instructor notes.
 15 "The extraction. Operational experience has proven
 16 that the safest and most effective way of dealing with
 17 a subject inside the vehicle is to maintain the speed
 18 and surprise with controlled aggression and verbal
 19 stunning (as long as it is justified and necessary in
 20 the circumstance).
 21 "The second officer to arrive at the vehicle having
 22 cleared the rear cabin area will, after ensuring that
 23 firearms cover is in place on to the subject, stow their
 24 MP5 or holster their Glock. They will then open the
 25 door and take hold of the subject by the closest wrist

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<p>1 to them, pull their arm out to 90 degrees, initiating</p> <p>2 a straight armlock. This should be done whilst standing</p> <p>3 beside the driver's door post to ensure the officer</p> <p>4 stays outside of the cabin area and fighting arc of the</p> <p>5 subject. The officer's other hand should be above the</p> <p>6 elbow joint to complete the armlock. They will tell the</p> <p>7 subject to get out of the vehicle whilst levering them</p> <p>8 out using the armlock and takedown technique, assisting</p> <p>9 them from the vehicle and down to the ground to be</p> <p>10 detained. This should be accompanied by the repeated</p> <p>11 commands of 'Out, out, down, down, down' (these</p> <p>12 techniques are taught to all MPS officers and is</p> <p>13 pictorially found within the officer safety unit)."</p> <p>14 Then it goes on to describe the best technique used</p> <p>15 including a rotation of the hips in order to get the</p> <p>16 subject's head below the officer's hips.</p> <p>17 That was familiar to you, was it, as at 11 December?</p> <p>18 A. Yes.</p> <p>19 Q. Were you expecting, as S111 ran ahead of you to the</p> <p>20 vehicle, for you to provide him with firearms cover</p> <p>21 whilst he extracted one of the occupants?</p> <p>22 You can take that down.</p> <p>23 A. Initially I was expecting, if I could have got past,</p> <p>24 I would have got past and opened up the rear door, to</p> <p>25 open the door and put cover in to the rear of the</p> <p style="text-align: center;">Page 137</p>	<p>1 vehicle. That is what I would have done at that stage.</p> <p>2 Q. So it was your intention to bypass the front passenger</p> <p>3 seat occupant and to go straight to the back of the</p> <p>4 vehicle?</p> <p>5 A. That's if I could have got past, then that is what</p> <p>6 I would have done, yes.</p> <p>7 Q. What do you mean if you could have got past?</p> <p>8 A. Well, I couldn't get past S111, because he was standing</p> <p>9 in the gap between the two vehicles.</p> <p>10 Q. As you approached the vehicle?</p> <p>11 A. Yes.</p> <p>12 Q. So who were you expecting would extract the front-seat</p> <p>13 passenger?</p> <p>14 A. So once -- the first thing we have to do is control all</p> <p>15 the occupants before we start extracting.</p> <p>16 Q. Right.</p> <p>17 A. So at that stage there was no cover into the rear of the</p> <p>18 vehicle.</p> <p>19 Q. No, but S111 was ahead of you.</p> <p>20 A. Yes, but he had stopped at the passenger door, at the</p> <p>21 front passenger door.</p> <p>22 Q. Right. So at that stage, you told him to push on?</p> <p>23 A. Yes.</p> <p>24 Q. So that he would do what?</p> <p>25 A. To get some vision into the rear of the vehicle, into</p> <p style="text-align: center;">Page 138</p>
<p>1 the back of the car.</p> <p>2 Q. Right.</p> <p>3 When you reached the front passenger window, did you</p> <p>4 attempt to break it?</p> <p>5 A. No, I didn't.</p> <p>6 Q. Why not?</p> <p>7 A. Because I had seen -- I had seen S111 attempt to do it,</p> <p>8 and hadn't been able to do it.</p> <p>9 Q. Were you also aware by that time that some of the other</p> <p>10 vehicle doors had been opened?</p> <p>11 A. No, I wasn't aware that any other doors had been opened.</p> <p>12 Q. When you took the decision to open the front passenger</p> <p>13 door, where was S111?</p> <p>14 A. He had moved down towards the rear of the vehicle, but</p> <p>15 I had sort of lost sight of him.</p> <p>16 Q. Did you become aware that he had moved to the end of the</p> <p>17 vehicle and opened the rear passenger door?</p> <p>18 A. I -- I wasn't aware of what he was doing at that stage.</p> <p>19 Q. All right.</p> <p>20 As you opened the front passenger door, what was it</p> <p>21 your intention to do?</p> <p>22 A. To put cover and then wait for someone else to come and</p> <p>23 extract, or for someone else to tell me to move and they</p> <p>24 put the cover on and then I extract.</p> <p>25 Q. Because as you opened the door, did you realise that it</p> <p style="text-align: center;">Page 139</p>	<p>1 would have been impossible for you to extract the</p> <p>2 passenger with any sort of human contact because you</p> <p>3 couldn't reach him then, could you?</p> <p>4 A. I -- no, once the door was open, it would ... yes, it</p> <p>5 would have been difficult to get someone else past.</p> <p>6 Q. Yes.</p> <p>7 You were effectively alone with your weapon aimed at</p> <p>8 the front-seat passenger, weren't you? You had no</p> <p>9 assistance from anybody?</p> <p>10 A. At that stage, no.</p> <p>11 Q. And there was no way that anybody could come to your</p> <p>12 assistance without climbing over the silver BMW or</p> <p>13 coming around the back and through the space that had</p> <p>14 been blocked by S111 opening his door?</p> <p>15 A. Yes, that is -- yes. I was -- I was blocking that,</p> <p>16 someone getting through to the other side.</p> <p>17 Q. Did you think about moving past the door before opening</p> <p>18 it, so that you would have placed yourself in a position</p> <p>19 to physically extract the front passenger?</p> <p>20 A. That would have meant me passing a door that I couldn't</p> <p>21 see into, and the possibility of a threat still being</p> <p>22 the other side of that steamed-up window.</p> <p>23 Q. Right. I would just like to take a look, please, at</p> <p>24 some of the images from the reconstruction, which</p> <p>25 I think you understand has taken place.</p> <p style="text-align: center;">Page 140</p>

35 (Pages 137 to 140)

1 **A. Okay.**
 2 Q. It is INQ27, please, Mr Coates, at page 6.
 3 If we look at figures 2 and 3, we can see the black
 4 Audi positioned in a reconstruction next to what is
 5 a blue, not a silver, BMW. But do you accept that that
 6 reflects the restrictive level of opening that was
 7 available to you of the door because of the proximity of
 8 the other vehicle?
 9 **A. Yes.**
 10 Q. It made it impossible for you to deliver any distraction
 11 strikes, didn't it?
 12 **A. Yes.**
 13 Q. It made it impossible for you to drag that front-seat
 14 passenger from the vehicle?
 15 **A. Yes.**
 16 Q. You had no Taser with you?
 17 **A. No.**
 18 Q. So it left you with two options, did it not, verbal
 19 commands or your firearm?
 20 **A. That's correct.**
 21 Q. Did you think about the possibility of using your
 22 firearm simply to threaten the front-seat passenger?
 23 **A. I was pointing my firearm at the front-seat passenger.**
 24 Q. Having opened the door, what did you see?
 25 **A. I saw a male sitting in the passenger seat wearing dark**

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1 **A. That's correct, sir.**
 2 Q. Is that still your belief?
 3 **A. Yes, sir.**
 4 Q. So you expected him to move his hands?
 5 **A. Yes.**
 6 Q. And in fact you told him to do so?
 7 **A. Yes, I did, sir.**
 8 Q. Talking of the position of the bag, you say that it was
 9 on or around his chest. Which side or was it in the
 10 middle?
 11 **A. I can't remember the exact position of the bag.**
 12 Q. Could we move to page 13 of this document, please.
 13 I am just going to read through the text on this
 14 page:
 15 "Scenarios were conducted to explore possible
 16 options for the position of the man bag on
 17 Jermaine Baker at the time that the shot was fired.
 18 These included being worn over either shoulder and
 19 different positions on the chest. It is not known
 20 whether Jermaine Baker was left or right handed."
 21 I think we now know that he was right handed:
 22 "When the man bag was worn by the actor to their
 23 left side as shown in the two images below [figures 13
 24 and 14] its front aspect can be seen away from the body
 25 and the damage to the shoulder strap correlating with

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1 **clothing, and what I thought was a balaclava. And the**
 2 **bag on his chest, man bag.**
 3 Q. Was he asleep?
 4 **A. No.**
 5 Q. What degree of visibility did you have into the car?
 6 **A. I had clear vision through that gap that you can see**
 7 **between the open car door and the sill of the Audi.**
 8 Q. Let's move to page 7 of the document, the next page, and
 9 take a look at the figures on the next page, please.
 10 Looking at figure 6, does that give you some
 11 assistance in your recollection of what you could see as
 12 you looked into the vehicle?
 13 **A. Yes, sir.**
 14 Q. Can we go to the next page, please.
 15 Looking at figure 8, does that give you some
 16 assistance as to your position against the Audi as you
 17 opened the car door?
 18 **A. Yes, sir.**
 19 Q. You have said in your witness statement that you
 20 repeatedly shouted for the front-seat passenger to put
 21 his hands on the dashboard and that he didn't do so?
 22 **A. That's correct, sir.**
 23 Q. In your most recent witness statement to this inquiry,
 24 you said that you believe that you shouted for him to
 25 put his hands on the dashboard several times?

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1 the entry wound on the neck area. It should be noted
 2 that during the positioning of the bag in various
 3 positions on the actor, the length of the straps was
 4 never physically shortened. Rather the straps were
 5 pulled behind the actor's back and compressed between
 6 the back and the seat. With the strap extended the man
 7 bag position would be on the side of the actor as
 8 represented in the image figure 13 below."
 9 Do you think that the bag was in that position?
 10 **A. I can't be sure of the position of the bag on Mr Baker.**
 11 Q. Can we go to the next page, please.
 12 Figure 14:
 13 "The position of the man bag towards the upper area
 14 of the chest would be achieved if one of the straps is
 15 held between the actor's back and the seat. The
 16 scenarios demonstrated that the man bag could also have
 17 been worn over the left shoulder, with the bag sitting
 18 on the right side or high on the right side of the
 19 chest."
 20 That is figures 15 and, over the page, please, 16
 21 and indeed 17.
 22 That provides us with a variety of positions. I am
 23 summarising but if the strap of the bag is taken and
 24 kept behind the back, then it is possible for the man
 25 bag to be in the upper chest positions. If the strap is

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1 loosened, then the bag, as would make logical sense,
 2 lies not on the chest but at the lower side, either the
 3 right or the left side. All of those positions have
 4 been tested during the course of this reconstruction and
 5 are capable of being achieved with the damage to the
 6 strap still being in a position that would be expected
 7 at the time of the shot.
 8 So doing the best that you can, are you able to,
 9 with reference to any of these figures, indicate, as you
 10 opened the door, where the man bag was?
 11 **A. All I can say is it was high on his chest and I was**
 12 **focused on his hands.**
 13 Q. In your witness statement that we see behind tab 5,
 14 which was made on 19 February 2016, you talk of the
 15 positioning of the front-seat passenger, Mr Baker's
 16 hands. Could we have a look at this please, for
 17 a moment, it is IPC1075, at page 3.
 18 Can we highlight the second paragraph, please:
 19 "I can remember opening the front passenger door.
 20 I do not remember whether I was able to open it fully or
 21 whether it was restricted by the size of the gap between
 22 the Audi and the vehicle to my right or to the nearside
 23 of the Audi."
 24 Pausing there, we do know it was restricted, don't
 25 we?

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1 INQ27, page 11.
 2 I would like to look at figures 9, 10 and the one on
 3 the next page, please, 11.
 4 Using figures 9 to 12, are you able to recollect
 5 which of those figures most accurately depicts your
 6 understanding of where his hands were at the time that
 7 the shot was fired?
 8 **A. At the time that I decided to fire my weapon, his hands**
 9 **were much lower, and they were on their way towards the**
 10 **bag.**
 11 Q. Right, so you are describing some sort of midway between
 12 his lap and his chest, and they were moving upwards?
 13 **A. Yes.**
 14 Q. Doing the best you can with the position of the man bag,
 15 where were the hands in relation to the man bag at the
 16 time that the shot was fired?
 17 **A. They were moving towards the man bag.**
 18 Q. Are you describing coming from the lap and moving back
 19 towards his chest area?
 20 **A. Back up towards the man bag that was on his chest.**
 21 Q. So in a reverse -- I am going to describe a reverse
 22 movement towards his body?
 23 **A. My perception was that his hands were moving towards the**
 24 **bag.**
 25 Q. Were they moving back in the direction towards the bag

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1 **A. Yes.**
 2 Q. "I do not remember the door closing itself. At that
 3 moment, I would have had intense focus on establishing
 4 whether the front-seat passenger had a gun and was about
 5 to shoot at us, and so I was not focusing on the
 6 position of the car door."
 7 Can we go to the next paragraph, please:
 8 "I cannot add any detail to what I have said about
 9 the position of his hands. I have said that they moved
 10 quickly up to his chest. I could see both of his hands.
 11 Both moved at the same time. Both moved upwards towards
 12 his chest. His hands moved from a low position."
 13 If we could just turn to the next page, please,
 14 page 4, and highlight the first paragraph on that page:
 15 "He would not have been able to see any other
 16 officer. He had the opportunity to put his hands on the
 17 dash. Had he done so, I would not have fired. His
 18 lifting of his hands quickly from low in his lap area
 19 towards his chest caused me to believe he was going for
 20 a gun and that is why I shot him."
 21 Does that, in conjunction with the previous
 22 paragraph, accurately reflect your recollection of the
 23 movement of his hands?
 24 **A. Yes, sir.**
 25 Q. Can we go back, now, please to the reconstruction,

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1 and the body, where it was sitting on the body?
 2 **A. They were moving up towards the bag.**
 3 Q. Right.
 4 Out of fairness, we do not know the length of the
 5 strap that the bag had on it at the time of the
 6 shooting, but you are describing a position of the bag
 7 on the chest area rather than any lower?
 8 **A. It was up around the chest area, sir.**
 9 Q. Do you agree that the description that you have given of
 10 the movement of his hands at the time that the weapon
 11 was fired is consistent with him putting up his hands in
 12 an indication of surrender?
 13 **A. No.**
 14 Q. Why not?
 15 **A. I don't, sir. The hands were moving towards the bag.**
 16 Q. But they were moving in an upwards direction?
 17 **A. Yes, they were.**
 18 Q. Right, so isn't that consistent with them making their
 19 way up to putting his hands up?
 20 **A. His hands were on the way towards the bag, sir.**
 21 Q. Were you aware of any instructions being shouted by any
 22 of the other officers at this time?
 23 **A. No, I wasn't.**
 24 Q. Did you not hear the repeated shouts of "Put your hands
 25 up"?

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1 **A. No. I was focused on the role that I was doing at that**
2 **time.**
3 Q. I want to ask you about the position of the muzzle of
4 your weapon and how far into the vehicle it was.
5 I would like to go to page 9 of this report, please.
6 Thank you.
7 And look at the series of eight points about which
8 the experts were agreed, and in particular point 7:
9 "The muzzle of the tactical rifle was within
10 50 centimetres max of the left wrist, minimum distance
11 a few centimetres away from the muzzle but not contact."
12 That was the ballistic expert evidence.
13 Do you agree that the muzzle of your weapon was
14 within 50 centimetres of Mr Baker's left wrist when you
15 fired?
16 **A. Yes.**
17 Q. Did that place it in danger of the possibility that
18 Mr Baker would be able to grab the muzzle of the weapon
19 as it protruded into the vehicle?
20 **A. Yes, it did.**
21 Q. Was that contrary to your training?
22 **A. I am aware that we try and stay outside what we call the**
23 **"fighting arc", where people could take hold of our**
24 **weapons.**
25 Q. Why was your weapon protruding so deeply into the

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1 Q. And you did no more at that stage than press your
2 trigger -- your finger against the trigger?
3 **A. That's correct.**
4 Q. Was the bag open at the time?
5 **A. I can't remember if the bag was open or not.**
6 Q. But the hands hadn't reached the bag?
7 **A. They were moving towards the bag.**
8 Q. Why didn't you wait until you saw any part of a weapon
9 before you fired yours?
10 **A. Because my training is that action beats reaction, so**
11 **I couldn't wait until Mr Baker's hands reached the bag.**
12 Q. But you would have had an opportunity once his hands had
13 reached the bag, and grappled with a weapon, to shoot
14 then, wouldn't you, given the proximity that you had to
15 him?
16 **A. I couldn't wait for his hands to reach the bag.**
17 Q. He was sitting in a chair in a car, wasn't he?
18 **A. Yes, he was.**
19 Q. You were standing over him, pointing your weapon at
20 close range.
21 You were keeping your absolute focus on him?
22 **A. On his hands, yes.**
23 Q. Yes. So you could have waited a few seconds more to
24 establish whether or not he was indeed about to take
25 a weapon out of that bag, couldn't you?

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1 vehicle?
2 **A. Because I wanted obviously to gain vision into that**
3 **vehicle.**
4 Q. And you decided that you had no option but to hold the
5 weapon in the position that you did?
6 **A. That's correct, sir.**
7 Q. How many seconds after S111 had failed to break the
8 passenger window did you fire your shot?
9 **A. It all happened very quickly, sir, I don't know the**
10 **exact timings.**
11 Q. At what point did you place your finger on the trigger?
12 **A. It would have been when the hands were moving towards**
13 **the bag.**
14 Q. Where was your laser pointed at that time?
15 **A. In the upper area of the body.**
16 Q. Did you have the opportunity to take aim?
17 **A. No, I didn't, sir.**
18 Q. I think you have said in your witness statement that you
19 didn't have time to take careful aim, and I am going to
20 suggest that that might indicate that you had some
21 opportunity to take some aim?
22 **A. Yes, sorry, some aim.**
23 Q. Did you check your line of sight?
24 **A. No, because the -- well, I knew where the laser was**
25 **pointing.**

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1 **A. No, my training is that -- is that his actions could**
2 **beat my reactions, so I reacted to his actions moving**
3 **towards the bag.**
4 Q. Without knowing whether it contained a weapon at all?
5 **A. Given all the information, I was sure that there was**
6 **a gun in that bag, and that is why I decided to fire.**
7 Q. In those circumstances are you trained to fire your
8 weapon twice?
9 **A. No. We are trained to fire once and then reassess.**
10 Q. If I was to suggest that you only fired once because
11 once you had, you realised your mistake, would that be
12 accurate or not?
13 **A. No, that wouldn't be accurate.**
14 Q. I want to put another scenario to you as well. Did you
15 discharge your firearm by accident, as you opened the
16 door?
17 **A. No, sir.**
18 Q. I would like to ask you about a comment that you made in
19 your witness statement of 4 March, that is SLA6, at
20 paragraph 33. Could we put that up, please.
21 Paragraph 33 is on page 9. Could we highlight that
22 paragraph, please. It is just the part on page 9.
23 It is halfway down through that paragraph:
24 "The male was still conscious at this stage. I have
25 said in my statement that I could see an obvious wound

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<p>1 in his upper chest. I am aware now that the wound is at 2 the join of the neck and the upper chest. I think 3 I made an assumption from the obvious sign of bleeding 4 that the wound was in the upper chest. Also, at the 5 time I believed my point of aim had been the upper chest 6 and so that is where I expected the wound to be." 7 Having pointed your firearm and aimed your laser at 8 the upper chest, was your weapon then knocked by the 9 motion of you opening the door, which caused your finger 10 to activate the trigger accidentally? 11 A. No, sir. 12 Q. How long was your finger on the trigger before you 13 pulled it? 14 A. As soon as my finger went on the trigger, I would have 15 squeezed the trigger. 16 So my finger would have been outside the trigger 17 guard and it would have moved inside and squeezed the 18 trigger. 19 Q. Let's just look at an image of the weapon, please, so 20 that we can be sure as to what you are describing. It 21 is MPS147, please, Mr Coates, page 40. 22 Can we go to the next page, please. 23 Where we see the trigger, there is a loop of metal 24 that connects and provides an oval of space around the 25 trigger. Is the bottom of that loop what you would</p> <p style="text-align: center;">Page 153</p>	<p>1 describe as the "trigger guard"? 2 A. The whole loop is the trigger guard. 3 Q. Your finger would have been underneath that guard -- 4 A. Outside -- so alongside. 5 Q. On the outside? 6 A. Yes. 7 Q. Until you placed it on the trigger? 8 A. That's correct, sir. 9 Q. Is your evidence that as soon as you placed it on the 10 trigger, you pulled it? 11 A. That's correct, sir. 12 Q. Thank you, we can take that down. 13 I am going to play the Audi footage of the 14 interception and at the same time I am going to display 15 what is an agreed transcript of what can be heard by our 16 experts from that audio footage. 17 There are two pieces of audio footage, just to 18 explain to you. 19 The first that I am going to play includes the 20 approach of you and the other officers to the Audi 21 vehicle, and we can hear the shouts of "armed police". 22 The quality of that audio footage is not of the 23 best, so I am going to play that first of all, twice. 24 Then I am going to play an enhanced version, which 25 doesn't include the shouts of armed police. But it has</p> <p style="text-align: center;">Page 154</p>
<p>1 been enhanced for us to listen to the banging sounds in 2 an attempt to identify the timing of your shot, all 3 right? 4 Can we put up, please, on the screen, the transcript 5 at INQ25. Thank you. It might assist if we can put the 6 first page and the second page side by side, please. 7 Can we play MPS3938 from the timing 29.30, please. 8 (3.13 pm) 9 (Audio recordings were played to the inquiry) 10 (3.14 pm) 11 MS BLACKWELL: Thank you, can we play that passage again, 12 please, from 29.30. 13 (3.14 pm) 14 (Audio recordings were played to the inquiry) 15 (3.15 pm) 16 MS BLACKWELL: Thank you. 17 I am going to ask that we listen to the second piece 18 of audio footage, which is MPS4161, which begins just 19 after the sounds of "armed police", you will hear the 20 banging on the window. 21 (3.15 pm) 22 (Audio recordings were played to the inquiry) 23 (3.16 pm) 24 MS BLACKWELL: Thank you. 25 Can we play that footage again, please.</p> <p style="text-align: center;">Page 155</p>	<p>1 (3.16 pm) 2 (Audio recordings were played to the inquiry) 3 (3.17 pm) 4 MS BLACKWELL: Thank you. 5 I should make clear that the audio footage that we 6 have just listened to, the two pieces were recorded on 7 different devices. 8 The first one with the lesser quality is the live 9 feed. 10 The second one, although it has been enhanced, is 11 the store and retrieve that was inside the vehicle. 12 On either of those pieces of audio footage, did you 13 hear yourself issuing a command to the front-seat 14 passenger to put his hands on the dashboard? 15 A. I couldn't hear -- I couldn't hear that being said. 16 Q. No. Not even once, never mind repeatedly. 17 Would you like to reconsider your recollection as to 18 what it was you shouted to the front-seat passenger for 19 him to do? 20 A. I am sure that I shouted "put your hands on the dash". 21 THE CHAIRMAN: Dash or dashboard? 22 A. Probably on the dash. 23 THE CHAIRMAN: It might not matter in many situations, but 24 if we are trying to pick something up from a recording, 25 it becomes important, do you understand.</p> <p style="text-align: center;">Page 156</p>

<p>1 A. Yes, sir, "Put your hands on the dash".</p> <p>2 THE CHAIRMAN: Thank you.</p> <p>3 MS BLACKWELL: In fairness to you, I want to remind you of</p> <p>4 what you have said previously. In your witness</p> <p>5 statement on 11 December, so the day of the incident,</p> <p>6 you said this:</p> <p>7 "I shouted repeatedly for him to put his hands on</p> <p>8 the dashboard. He did not place his hands on the</p> <p>9 dashboard."</p> <p>10 In the witness statement of 4 March of this year,</p> <p>11 you said:</p> <p>12 "I shouted at him to put his hands on the dashboard.</p> <p>13 I believe I shouted this several times."</p> <p>14 A. Okay.</p> <p>15 Q. With that in mind, and in answer to the chair's</p> <p>16 question, was it "dash" or "dashboard"?</p> <p>17 A. I think more likely to be dashboard.</p> <p>18 THE CHAIRMAN: Thank you.</p> <p>19 MS BLACKWELL: All right.</p> <p>20 The second question I would like you to consider in</p> <p>21 relation to this audio footage is whether or not the</p> <p>22 first loud bang that we hear once the car has been</p> <p>23 opened is the sound of your shot?</p> <p>24 A. I can't be sure that it was my shot.</p> <p>25 THE CHAIRMAN: It is difficult because you hear a series of</p> <p style="text-align: center;">Page 157</p>	<p>1 bangs --</p> <p>2 A. Yes, sir.</p> <p>3 THE CHAIRMAN: -- what might help you is that there become</p> <p>4 as time -- Ms Blackwell will tell me if I am wrong --</p> <p>5 when because the door has been opened, it is much easier</p> <p>6 to hear what is being said because of the probe.</p> <p>7 A. Yes, sir.</p> <p>8 THE CHAIRMAN: It may be better in those circumstances for</p> <p>9 it to be played again, Ms Blackwell.</p> <p>10 MS BLACKWELL: Yes, certainly.</p> <p>11 It is MPS4161, please, Mr Coates.</p> <p>12 THE CHAIRMAN: You know what you are concentrating on now.</p> <p>13 A. Yes, sir.</p> <p>14 (3.19 pm)</p> <p>15 (Audio recordings were played to the inquiry)</p> <p>16 (3.19 pm)</p> <p>17 MS BLACKWELL: Would you like me to play it again?</p> <p>18 A. No, that's fine.</p> <p>19 Q. With the instructions of the chair in mine, do you think</p> <p>20 the sound that we hear, the loud sound that sounds like</p> <p>21 a thud after the door has been opened is consistent with</p> <p>22 the timing of your shot?</p> <p>23 A. Yes, sir.</p> <p>24 THE CHAIRMAN: Thank you.</p> <p>25 MS BLACKWELL: Thank you.</p> <p style="text-align: center;">Page 158</p>
<p>1 Take that down.</p> <p>2 How soon after firing your weapon did you become</p> <p>3 aware of the injury to Mr Baker?</p> <p>4 A. The hands dropped pretty much straight away, so I am</p> <p>5 obviously aware then that I have shot Mr Baker.</p> <p>6 Q. At about the same time were you aware of R116, who was</p> <p>7 a medic, shouting that there had been a shot?</p> <p>8 A. Yes.</p> <p>9 Q. Did he tell you to get Mr Baker out of the vehicle?</p> <p>10 A. He was behind me and I was obviously obstructing him</p> <p>11 getting past the door, so, yes, between us I had to move</p> <p>12 my position to be able to get Mr Baker out of the</p> <p>13 vehicle.</p> <p>14 Q. And you and R116 dragged him out?</p> <p>15 A. That's correct.</p> <p>16 Q. And to the front of the vehicle.</p> <p>17 A. Yes, sir.</p> <p>18 Q. The inquiry has heard of the assistance that was then</p> <p>19 given to Mr Baker, including by you who I think was</p> <p>20 involved in providing him with first aid?</p> <p>21 A. That's correct, sir.</p> <p>22 Q. When you next spoke to S105, he was attempting to</p> <p>23 identify who it was that had fired the shot, wasn't he?</p> <p>24 A. Yes.</p> <p>25 Q. And he spoke to you?</p> <p style="text-align: center;">Page 159</p>	<p>1 A. Yes.</p> <p>2 Q. He asked you straight out whether it was you who had</p> <p>3 fired the shot?</p> <p>4 A. Yes, that's correct.</p> <p>5 Q. And you said yes?</p> <p>6 A. Yes.</p> <p>7 Q. The description that you gave to him after confirming</p> <p>8 that it was you was using these words, "He moved his</p> <p>9 hands up to his chest area". Do you agree with that?</p> <p>10 A. Yes, I can't recall saying -- those words, but yes.</p> <p>11 Q. Let's have a look at how they appear in the witness</p> <p>12 statement of S105, it's at MPS48, please, page 9.</p> <p>13 Thank you.</p> <p>14 It is in the top half of the second paragraph,</p> <p>15 please, if we could enlarge that.</p> <p>16 Thank you.</p> <p>17 It is six lines down:</p> <p>18 "The third person I asked was W80. He said he had</p> <p>19 fired when I asked him. I asked if he was okay and for</p> <p>20 a brief account of what happened. He said words to the</p> <p>21 effect of 'he moved his hands up to his chest area',</p> <p>22 whilst physically demonstrating the move. He did not</p> <p>23 give and I did not ask for any justification, I just</p> <p>24 stopped there."</p> <p>25 All right, now, does that remind you of the words,</p> <p style="text-align: center;">Page 160</p>

40 (Pages 157 to 160)

1 or words to the effect that you used to him when you
 2 described what happened?
 3 **A. Yes, sir.**
 4 Q. Do you agree that you didn't mention to him that his
 5 hands were going towards his man bag?
 6 **A. Yes, if S105 hasn't put that down, then --**
 7 Q. You accept you didn't say it?
 8 **A. What, that he -- mention the bag?**
 9 Q. Yes.
 10 **A. Not to S105.**
 11 Q. Nor did you make any mention of your fear that he was
 12 going for a gun?
 13 **A. Not at that time, no, sir.**
 14 Q. Why did you not mention those two factors, those two,
 15 what I am going to describe as important details?
 16 **A. Because I was giving S105 a sort of an account of what**
 17 **had happened -- at that time.**
 18 Q. If you were sure that he had been going for his man bag,
 19 would you have not have mentioned it then to S105?
 20 **A. He was going for his man bag, but for whatever reason**
 21 **I haven't mentioned it to S105 at this time.**
 22 Q. The same question in relation to the gun, if you were
 23 sure that in your mind he was going for a gun, would you
 24 not have mentioned that to S105?
 25 **A. Yes. Yes.**

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1 were none?
 2 **A. That's correct, sir.**
 3 Q. At some stage were you accompanied back to the range
 4 where in the presence of the DPS and the IPCC you made
 5 your weapon safe by unloading it and clearing it and
 6 making sure there was no ammunition left in the weapon
 7 before handing it over to the DPS?
 8 **A. That's correct, sir.**
 9 Q. Were the rounds then counted out and was it established
 10 that you had fired one round?
 11 **A. That's correct.**
 12 Q. The same process was undertaken with your Glock and it
 13 was discovered that there were no rounds missing?
 14 **A. Yes, sir.**
 15 Q. Was it arranged that you would return to Leman Street at
 16 a future occasion?
 17 **A. Yes.**
 18 Q. Before you left that day, did you make a witness
 19 statement?
 20 **A. Yes, sir.**
 21 Q. Were you taken home by two colleagues after you left
 22 Leman Street?
 23 **A. Yes, sir.**
 24 Q. I am going to read from your witness statement at SLA6.
 25 I don't ask that this is displayed, it is

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1 Q. The same answer?
 2 **A. Yes.**
 3 Q. You were then asked to sit in the back of a van with
 4 officer G79 -- you can take that down please -- and you
 5 took off your gloves and you were given some alcohol
 6 wipes. Your clothing and your shoes had blood on them,
 7 brought about as a result of the close contact that you
 8 had had with Mr Baker when you were giving him first aid
 9 and then you were driven back to Leman Street, where you
 10 became involved in the post-incident process?
 11 **A. That's correct.**
 12 Q. That in your understanding was normal practice when
 13 a police officer discharges a round in the line of duty?
 14 **A. Yes, that's correct.**
 15 Q. Not something that you had ever been involved in before?
 16 **A. No, I have never been a key police witness.**
 17 Q. Were you introduced to an officer from the department of
 18 professional standards?
 19 **A. Yes.**
 20 Q. Did you also obtain advice from the Police Federation
 21 and from a solicitor?
 22 **A. That's correct.**
 23 Q. Were you examined by a forensic medical examiner --
 24 **A. Yes.**
 25 Q. -- to see whether you had any injuries, of which there

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1 paragraph 38 for your reference, sir.
 2 THE CHAIRMAN: Thank you.
 3 MS BLACKWELL: You say:
 4 "I was shocked and upset ..."
 5 And when you got home, you were also upset at the
 6 reaction from your partner, who you told what had
 7 happened?
 8 **A. That's correct, sir.**
 9 Q. You had never thought about the wider implications on
 10 family and friends of being involved in an incident of
 11 this type?
 12 **A. That's correct.**
 13 Q. You say that you and your partner spoke for a while and
 14 you went to bed but you couldn't sleep?
 15 **A. That's correct, sir.**
 16 Q. You were aware that your actions would be scrutinised
 17 because you had fired a weapon and as a result of it
 18 someone had died.
 19 **A. That's correct, sir.**
 20 Q. And that you were prepared for that, at that time?
 21 **A. Yes, sir.**
 22 Q. You describe how the following day you felt exhausted
 23 and that you also -- you describe having had not eaten
 24 for a few days.
 25 Does that indicate that on the Friday, the day

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<p>1 before, you had not eaten?</p> <p>2 A. I think we had some breakfast, a McDonald's, prior to</p> <p>3 going to Quicksilver but after that, I don't think I ate</p> <p>4 on that day, no.</p> <p>5 Q. Looking back to the time that your shot was fired, how</p> <p>6 would you describe your physical and your mental health</p> <p>7 at that point in time?</p> <p>8 A. Good.</p> <p>9 Q. The exhaustion that you felt on Saturday was as a result</p> <p>10 of what had taken place on Friday, and not as a result</p> <p>11 of anything else?</p> <p>12 A. No.</p> <p>13 Q. Over the course of Saturday, did you realise that the</p> <p>14 incident was in the news?</p> <p>15 A. Yes.</p> <p>16 Q. Did that cause you further concern?</p> <p>17 A. Yes, it did.</p> <p>18 Q. By the Sunday, you describe yourself as being both</p> <p>19 physically and mentally exhausted and that you did not</p> <p>20 discuss the incident with anyone, although you were</p> <p>21 receiving messages from your colleagues?</p> <p>22 A. That's correct, sir.</p> <p>23 Q. At about 10.00 pm on Sunday, did you notice that you had</p> <p>24 received two missed calls on your mobile and a message</p> <p>25 for you to ring the superintendent?</p> <p style="text-align: center;">Page 165</p>	<p>1 A. Yes, sir.</p> <p>2 Q. Did you phone back and speak to him?</p> <p>3 A. I did, sir.</p> <p>4 Q. Did he tell you during that telephone call that you were</p> <p>5 to be suspended and that the IPCC were going to</p> <p>6 interview you under caution for murder?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Did you remember feeling utter shock and despair at</p> <p>9 hearing that?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Having appreciated on the Friday that your actions would</p> <p>12 be scrutinised on the basis that you had shot and killed</p> <p>13 someone, why was it that you felt shock at receiving the</p> <p>14 information that the IPCC wanted to interview you for</p> <p>15 murder?</p> <p>16 A. Because I just couldn't believe that at that time that</p> <p>17 I was being accused of murder.</p> <p>18 Q. You describe your feelings in this way:</p> <p>19 "I also felt an immediate loss of control of my</p> <p>20 life. I tried to make reason of the phone conversation</p> <p>21 but could not understand it and it seemed totally</p> <p>22 unreal."</p> <p>23 Is that right?</p> <p>24 A. That's correct, sir.</p> <p>25 Q. At 1.00 am did the superintendent arrive at your house</p> <p style="text-align: center;">Page 166</p>
<p>1 and did he sit down with you and your partner in your</p> <p>2 front room?</p> <p>3 A. He did.</p> <p>4 Q. Had you ever been suspended from duty prior to this?</p> <p>5 A. No.</p> <p>6 Q. Were you told not to communicate with anyone?</p> <p>7 A. Yes.</p> <p>8 Q. You describe yourself as feeling stunned and shocked and</p> <p>9 made to feel like a criminal?</p> <p>10 A. That's correct, sir.</p> <p>11 Q. And it felt as if your self-control had been taken away</p> <p>12 from you?</p> <p>13 A. Yes.</p> <p>14 Q. Once the superintendent had left, were you then visited</p> <p>15 by the Police Federation rep at about 3.00 am?</p> <p>16 A. That's correct.</p> <p>17 Q. You describe yourself in this way:</p> <p>18 "I tried to comprehend what was going on and what</p> <p>19 was going to happen next and could not understand why</p> <p>20 attitudes to my actions had changed."</p> <p>21 Whose attitude to your actions had changed in your</p> <p>22 mind?</p> <p>23 A. The ... the IPCC and obviously the police that were</p> <p>24 responding to the information from the IPCC.</p> <p>25 Q. In the decision to interview you under caution for</p> <p style="text-align: center;">Page 167</p>	<p>1 murder?</p> <p>2 By Monday, you had not had any sleep?</p> <p>3 A. No.</p> <p>4 Q. And you were feeling despair.</p> <p>5 A. Yes, sir.</p> <p>6 Q. Did you leave your house and take a train to a different</p> <p>7 place, indicating to your partner that you were going to</p> <p>8 London to see your solicitor, but that is not where you</p> <p>9 went?</p> <p>10 A. That's correct.</p> <p>11 Q. You were feeling shame and despair; is that right?</p> <p>12 A. Yes.</p> <p>13 Q. Did you realise that you had made a terrible mistake?</p> <p>14 A. No, that is not why I was feeling in despair.</p> <p>15 Q. But you had mistakenly believed that Mr Baker was going</p> <p>16 for a gun, in your version of events, hadn't you?</p> <p>17 A. I believed that he was going for a weapon that was in</p> <p>18 the man bag.</p> <p>19 Q. Yes. You knew by now that he didn't have a weapon in</p> <p>20 his man bag, didn't you?</p> <p>21 A. I can't remember when that information came to me, that</p> <p>22 there was no actual weapon in the bag. I can't</p> <p>23 remember.</p> <p>24 Q. When you did become aware that there was no weapon in</p> <p>25 the bag, did you also become aware that there was no</p> <p style="text-align: center;">Page 168</p>

42 (Pages 165 to 168)

<p>1 live weapon in the vehicle?</p> <p>2 A. I was -- I think I was aware that there was an Uzi in</p> <p>3 the rear of the vehicle, but, yes, at some stage I would</p> <p>4 have been told it wasn't a real one.</p> <p>5 Q. So at that stage, with that information provided to you,</p> <p>6 did you accept that what had happened was a terrible</p> <p>7 mistake?</p> <p>8 A. I didn't think it was a mistake.</p> <p>9 THE CHAIRMAN: What did you think it was?</p> <p>10 A. Sorry, I don't think I understand the question, sorry.</p> <p>11 THE CHAIRMAN: Well, sorry, either there was a weapon in the</p> <p>12 car, or there wasn't?</p> <p>13 A. Yes, sir.</p> <p>14 THE CHAIRMAN: Either there was a weapon in the bag or there</p> <p>15 wasn't?</p> <p>16 A. Yes, sir.</p> <p>17 THE CHAIRMAN: Well, there wasn't any weapon in the bag?</p> <p>18 A. No.</p> <p>19 THE CHAIRMAN: So whatever he was doing with his hands, he</p> <p>20 couldn't have been going for a weapon, agree?</p> <p>21 A. Yes, sir.</p> <p>22 THE CHAIRMAN: And there wasn't a live firearm in the car?</p> <p>23 It is against those facts that you are being asked</p> <p>24 I think by Ms Blackwell to consider whether or not, and</p> <p>25 if so when, you realised that you had made, to use her</p> <p style="text-align: center;">Page 169</p>	<p>1 expression, a terrible mistake?</p> <p>2 A. I don't think I made a terrible mistake.</p> <p>3 THE CHAIRMAN: All right, we cannot take it any further.</p> <p>4 At some stage, Ms Blackwell, as much for the benefit</p> <p>5 of the witness as for anybody else, we are going to have</p> <p>6 a break.</p> <p>7 MS BLACKWELL: I am very close to the end of my questions,</p> <p>8 so I am happy to break now or --</p> <p>9 THE CHAIRMAN: I am just anxious that -- I think I shall ask</p> <p>10 W80.</p> <p>11 Would you appreciate a short break before we have</p> <p>12 any further questions?</p> <p>13 A. Yes, sir.</p> <p>14 THE CHAIRMAN: Yes, we will have a short break.</p> <p>15 MS BLACKWELL: Thank you.</p> <p>16 THE CHAIRMAN: 3.50, please.</p> <p>17 Thank you.</p> <p>18 (3.37 pm)</p> <p>19 (A short adjournment)</p> <p>20 (3.55 pm)</p> <p>21 THE CHAIRMAN: Yes, Ms Blackwell.</p> <p>22 MS BLACKWELL: Thank you, sir.</p> <p>23 I am not going to take you through the next couple</p> <p>24 of days in the chronology from where we broke off,</p> <p>25 except to confirm that you were alone, away from home,</p> <p style="text-align: center;">Page 170</p>
<p>1 you self harmed, you drank alcohol, you took tablets,</p> <p>2 and, if I were to describe your mental state as being</p> <p>3 low, and your physical state as being fragile, would you</p> <p>4 agree with that?</p> <p>5 A. Yes, sir.</p> <p>6 Q. By the Wednesday, you felt that things had clicked in</p> <p>7 your mind and you had begun to see events more clearly,</p> <p>8 is that right?</p> <p>9 A. Yes, sir.</p> <p>10 Q. You describe yourself at that stage as knowing that you</p> <p>11 had done nothing wrong?</p> <p>12 A. Yes, sir.</p> <p>13 Q. And you could not understand the reason why you had been</p> <p>14 accused of murder?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Was it at that point that you telephoned your partner</p> <p>17 and you set the wheels in motion that in fact led to you</p> <p>18 coming back home?</p> <p>19 A. Yes, sir.</p> <p>20 Q. The evidence that I have been leading out of you</p> <p>21 relating to your behaviour and movements after the</p> <p>22 shooting comes from your witness statement provided on</p> <p>23 4 March of this year to this inquiry. It includes, does</p> <p>24 it not, graphic detail of your thoughts and feelings</p> <p>25 about your position from the time that you shot dead</p> <p style="text-align: center;">Page 171</p>	<p>1 Jermaine Baker?</p> <p>2 A. Yes, sir.</p> <p>3 Q. There is no reference in any of that text to any</p> <p>4 acknowledgment that you had over those days towards</p> <p>5 Jermaine Baker's family and how they might have been</p> <p>6 coping with what had happened.</p> <p>7 Did you have any thoughts for them in the days that</p> <p>8 we have discussed?</p> <p>9 A. Yes, sir.</p> <p>10 The -- yes. Yes, I would have.</p> <p>11 Q. What were those thoughts?</p> <p>12 A. That I was sorry for the loss of their family member.</p> <p>13 Q. When you were brought home you were interviewed by the</p> <p>14 IPCC on 17 December and, upon legal advice, you made no</p> <p>15 comment to all questions put?</p> <p>16 A. Yes, sir.</p> <p>17 Q. That interview was followed by a statement that you</p> <p>18 provided to the IPCC on 22 December 2015?</p> <p>19 A. That's correct.</p> <p>20 Q. You were interviewed by the IPCC for a second time on</p> <p>21 4 February 2016, and, upon legal advice, you made no</p> <p>22 comment to all questions put?</p> <p>23 A. That's right.</p> <p>24 Q. During that second interview, were you shown photographs</p> <p>25 of Jermaine Baker taken during his post mortem?</p> <p style="text-align: center;">Page 172</p>

<p>1 A. Yes, I was. 2 Q. How did that make you feel? 3 A. Not very good. 4 Q. Was that interview followed up by a statement provided 5 to the IPCC on 19 February 2016? 6 A. Yes. 7 Q. Were you interviewed for a third time by the IPCC on 8 11 August 2016? 9 A. That's correct. 10 Q. Upon legal advice, did you make no comment to all 11 questions put? 12 A. Yes, sir. 13 Q. Was that interview followed up by a statement provided 14 by you to the IPCC on 17 August 2015? 15 A. Yes. 16 Q. Did you then become aware of the decision of the Crown 17 Prosecution Service not to charge you with any offence? 18 A. Yes. 19 Q. That came following the submission to them by the IOPC, 20 as they then were, of their report? 21 A. Yes. 22 Q. I think you were informed of that decision on 23 14 June 2017? 24 A. Yes. 25 Q. On the basis that, according to the Crown Prosecution</p> <p style="text-align: center;">Page 173</p>	<p>1 Service, there was insufficient evidence to justify any 2 criminal proceedings against you? 3 A. Yes, sir. 4 Q. Did you then become aware that Mr Baker's family 5 exercised their victim's right of review, and were you 6 later informed on 19 March 2018 that the Crown 7 Prosecution Service had confirmed its decision not to 8 bring criminal proceedings against you? 9 A. Yes, sir. 10 Q. Were you served with a regulation 21 notice on 11 23 February 2019, informing you that the IOPC had 12 directed that you should face gross misconduct 13 proceedings? 14 A. Yes. 15 Q. Are those proceedings currently the subject of an appeal 16 to the Supreme Court? 17 A. Yes, they are, sir. 18 Q. When did you return to service? 19 A. July 2017. 20 Q. Did you undertake any assessments prior to returning to 21 service? 22 A. Once I had returned -- sorry, I had been seen by 23 an occupational health councillor from the very 24 beginning, all through my suspension right up until -- 25 and after -- I was returned to duty.</p> <p style="text-align: center;">Page 174</p>
<p>1 Q. Reinstated? 2 A. Reinstated. 3 Q. Yes. 4 A. And then I undertook a separate occupational health 5 meeting with a councillor after that, an assessment. 6 Q. An assessment. 7 Any additional training before you returned to work? 8 A. No, because I didn't return to an operational role and 9 I still am not in an operational role. 10 Q. Right, before we touch upon your current role, I asked 11 you towards the beginning of your evidence about your 12 deployment on 11 December. I think you told the inquiry 13 that that was the first deployment with which you had 14 been involved since your returning to an operational 15 role after two years of working as a firearms trainer? 16 A. No, what I said was during the time that I was a trainer 17 I had deployed operationally as part of a firearms team. 18 Q. But this was the first deployment following your return 19 to an operational role in November 2015? 20 A. Yes, three weeks, yes, sir. 21 Q. Right. Are you able to identify when the previous time 22 was that you deployed, and that is prior to 11 December, 23 was it during the two years that you had worked as 24 a trainer and occasionally deployed? 25 A. Yes the last time I deployed was in fact on the</p> <p style="text-align: center;">Page 175</p>	<p>1 Remembrance weekend, in November, whilst I was still in 2 a training role. 3 Q. Right. So a month/six weeks before 11 December. 4 A. Yes. Yes. 5 Q. A month. 6 You have remained working as a firearms trainer 7 since your return to service in July 2017; is that 8 right? 9 A. No, from July 2017 until January 2020 I was in 10 an administration role -- 11 Q. Right. 12 A. -- based at Leman Street. 13 Q. Is it since January 2020 that you have been placed as 14 a firearms trainer? 15 A. Yes, but still in a support role. 16 Q. Right. What does that mean? 17 A. I arrange facilities, I stooge -- so by "stooge" I mean 18 act during scenarios. I do general admin work. 19 Q. Right. That is your current role? 20 A. Yes, that's correct, sir. 21 Q. Is your intention to remain within the police service 22 but to return to an operational firearms posting at some 23 point? 24 A. Yes, sir. 25 Q. When do you hope that that might happen?</p> <p style="text-align: center;">Page 176</p>

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1 **A. I have no idea of timescales yet, sir.**
 2 Q. Is it your future intention to become an armed close
 3 protection officer?
 4 **A. Yes, sir.**
 5 Q. At the time that you fired your weapon, do you agree
 6 that you did not announce that shots had been fired?
 7 **A. I can't recall if I had -- if I shouted that or not.**
 8 Q. It is not something that you have ever suggested in any
 9 of your witness statements, is it?
 10 **A. No, not that I am aware of, no.**
 11 Q. No. Nor, I am going to suggest, are those two words
 12 audible on either of the audio footage that we have
 13 listened to today.
 14 Is it part of your training in circumstances where
 15 a weapon is discharged by an officer, that he should
 16 make that apparent to all around him by saying "shots
 17 fired"?
 18 **A. Some people may shout that. Others may not. Others may**
 19 **freeze or others may think that the fact that a shot has**
 20 **been fired, other people would know.**
 21 THE CHAIRMAN: What does the training require?
 22 **A. That someone should shout "shots fired".**
 23 THE CHAIRMAN: Yes.
 24 MS BLACKWELL: But you didn't? Or you don't remember doing
 25 so.

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1 **A. I am fairly sure that I repeated it, yes, sir.**
 2 MS BLACKWELL: Right.
 3 We can take that down now, please.
 4 Sir, I think that concludes my questions. I am just
 5 considering one further one, but if you have questions,
 6 could I invite you to pose them now, please?
 7 THE CHAIRMAN: Certainly.
 8 Questions from THE CHAIRMAN
 9 THE CHAIRMAN: You told us that when you attended at the
 10 scene, you still needed to close the car down, because
 11 even though it had been stationary for the best part of
 12 an hour, you didn't know whether it was going to attempt
 13 to drive off.
 14 **A. Yes, sir, and we needed to isolate and contain the**
 15 **occupants.**
 16 THE CHAIRMAN: Was that not a good reason for ensuring that
 17 one of you took the Benelli with you to enable a Hutton
 18 round to be fired if there was any attempt to move the
 19 car?
 20 **A. Yes, sir, but I decided not to take the Benelli shotgun**
 21 **with me.**
 22 THE CHAIRMAN: Well, there were three of you in the car.
 23 **A. Yes, sir, but it is normally the rear-seat passenger**
 24 **that takes the shotgun with them.**
 25 THE CHAIRMAN: Maybe the normal arrangement, but you had two

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1 **A. I don't remember doing so.**
 2 Q. All right.
 3 I want to ask you finally about your evidence that
 4 you repeatedly ordered Jermaine Baker to put his hands
 5 on the dashboard. We listened together, before the
 6 afternoon break, to the audio and you agreed that you
 7 didn't hear your words, "Put your hands on the
 8 dashboard"?
 9 **A. That's right, sir.**
 10 Q. Yes, and indeed it didn't feature on the agreed
 11 transcript which we looked at at the time that we were
 12 considering those audio recordings.
 13 I am asked to show you a document which is at
 14 IPC362, please, Mr Coates.
 15 This was prepared by an expert, Mr French, who has
 16 produced a number of transcripts and he has it as
 17 a possible interpretation at 00.13, after you see "Oh
 18 shit, armed police".
 19 In brackets, "(Put your hands on the dashboard so
 20 I can see them".
 21 And it is only said once.
 22 Do you maintain that you said to Jermaine Baker that
 23 he should put his hands on the dashboard?
 24 **A. Yes, sir.**
 25 Q. And did you say it repeatedly?

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1 weapons of your own --
 2 **A. Yes.**
 3 THE CHAIRMAN: -- and that is why you didn't take the third?
 4 **A. Yes, and the fact that the -- yes, I wanted my primary**
 5 **weapon with me.**
 6 THE CHAIRMAN: Did you tell the others, "I can't take the
 7 Benelli, one of you had better do so"?
 8 **A. I didn't say that, no, sir.**
 9 THE CHAIRMAN: You explained why it was that you hadn't
 10 taken the life hammer window breaker.
 11 **A. Yes, sir.**
 12 THE CHAIRMAN: That was because you want to keep both hands
 13 on your weapon?
 14 **A. Yes, sir.**
 15 THE CHAIRMAN: Does it follow therefore that if a firearms
 16 officer wants to keep both hands on his weapon, he or
 17 she will never take a life hammer window breaker on
 18 armed deployment?
 19 **A. That would -- yes, sir, that would ...**
 20 THE CHAIRMAN: Is that a reasonable inference?
 21 **A. That is a reasonable inference, sir, yes.**
 22 THE CHAIRMAN: Finally, in relation to the incident itself,
 23 do you agree that it is important that there be clarity
 24 in instructions given by armed officers?
 25 **A. Yes, sir.**

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1 THE CHAIRMAN: Having heard the transcripts, there are
 2 several references to put your hands up, and possibly
 3 one to put your hands on the dashboard.
 4 **A. Yes, sir.**
 5 THE CHAIRMAN: Do you agree that the words "put your hands
 6 on the dashboard" are arguably in conflict with "put
 7 your hands up"?
 8 **A. Yes. Yes, sir.**
 9 THE CHAIRMAN: Was there any discussion between the three of
 10 you in the car as to the words which you should use in
 11 order to ensure that the occupants of the car did not
 12 use a firearm or firearms?
 13 **A. No discussion about that, sir.**
 14 THE CHAIRMAN: Do you agree that there should have been?
 15 **A. No, sir. I don't.**
 16 THE CHAIRMAN: How then would you avoid the risk of
 17 inconsistency of instructions?
 18 **A. You are taught to, having got a view of the subject, to**
 19 **direct them -- to direct them in response to your**
 20 **perception of what is going on.**
 21 THE CHAIRMAN: So even if three of you see three different
 22 things, which might necessitate three different sets of
 23 instructions, all of which could be in conflict with one
 24 another, that is what you are taught?
 25 **A. Yes, sir.**

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1 already referred to that.
 2 There is a second potential at 29.51, on the blue
 3 print of Mr Barry:
 4 "(Put) (your hands) ((on the)) [unclear]."
 5 Which I think it is being suggested could also have
 6 been a direction to put Mr Baker's hands on the
 7 dashboard.
 8 THE CHAIRMAN: Yes.
 9 MS BLACKWELL: Thank you.
 10 There is one final matter, sir, if I may.
 11 THE CHAIRMAN: Yes.
 12 MS BLACKWELL: I am asked to take you back for a moment to
 13 the evidence that you gave on the morning of
 14 11 December, when you were at Quicksilver and waiting to
 15 deploy.
 16 **A. Yes.**
 17 Q. You will remember the time at which you heard the words
 18 "firearms enabled" coming over the radio?
 19 **A. Yes, sir.**
 20 Q. And you have explained what you took that to mean.
 21 I also went on to ask you about the intelligence
 22 that, as of the night before, the criminal gang had only
 23 managed to source an imitation firearm, and whether or
 24 not that would have affected your threat assessment.
 25 Your evidence on that was that it wouldn't, but if

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1 THE CHAIRMAN: Finally, you have told us that you returned
 2 to service in July 2017.
 3 **A. Yes, sir.**
 4 THE CHAIRMAN: At some later stage in the inquiry, we may
 5 hear some evidence about this, but it follows that you
 6 returned to service, did you not, at a time that the
 7 Crown Prosecution Service were still reviewing, at the
 8 family's behest, the decision that you should not be
 9 prosecuted?
 10 **A. I am not sure when the challenge went in, or sorry the**
 11 **family's request went in, sir. Whether that was after**
 12 **I had been returned to service or not. I am not sure.**
 13 THE CHAIRMAN: Well, that will emerge.
 14 Thank you.
 15 Ms Blackwell.
 16 Further questions from MS BLACKWELL
 17 MS BLACKWELL: There are a couple more questions.
 18 May I invite us to look, please, Mr Coates at INQ34.
 19 This is a comparison of the two transcripts prepared by
 20 Alan French and Martin Barry. If we go to the next
 21 page, please, we can see, according to the tape counter
 22 in the black print, original time on the far left of the
 23 schedule, 29.44, if we read across to Alan French's
 24 proposals, of what may have been said in brackets, "(Put
 25 your hands on the dashboard so I can see them)", we have

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1 that was taken in conjunction with the conversation
 2 heard in the Audi vehicle that morning, to be
 3 corroborative of only an imitation firearm having been
 4 provided and available to those in the Audi, that the
 5 effect of that in your evidence might have been that the
 6 whole operation, as far as the firearms officers were
 7 concerned, would have been stood down?
 8 **A. It may have been.**
 9 Q. Yes, all right. It is that that I would just like to
 10 ask you about, please.
 11 If you had known of the information overnight
 12 relating to the imitation firearm, and that hadn't led
 13 to you being stood down, and if you had been told that
 14 "firearms enabled" didn't necessarily mean a live
 15 firearm, would those two pieces of information, taken
 16 together, have altered your threat assessment?
 17 **A. I think my threat assessment would still have been high,**
 18 **as we were carrying out the interception.**
 19 Q. By that do I take it it would have been reduced from
 20 "very high" to "high"?
 21 **A. Yes.**
 22 MS BLACKWELL: Thank you.
 23 Sir, that concludes the questioning, but I know that
 24 the family would welcome a short break to confer with
 25 their legal advisers --

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1 THE CHAIRMAN: Yes.
 2 MS BLACKWELL: -- and to determine whether or not to make
 3 a further application.
 4 Could I invite you please to rise until 4.30, for
 5 that to be done?
 6 THE CHAIRMAN: Certainly.
 7 (4.19 pm)
 8 (A short adjournment)
 9 (4.38 pm)
 10 THE CHAIRMAN: Yes.
 11 MS BLACKWELL: Sir, thank you very much for the time
 12 allowed.
 13 I have had an opportunity of discussing and
 14 conferring with my learned friend Ms Kaufmann, who as
 15 you know represents the family, and I am intending to
 16 ask one further question or set of questions on their
 17 behalf.
 18 THE CHAIRMAN: Yes. Can I just say this.
 19 The fact that questions are not asked will not
 20 obviously in certain cases prevent points from being
 21 made in closing submissions --
 22 MS BLACKWELL: Yes.
 23 THE CHAIRMAN: -- as far as inferences which the inquiry can
 24 draw from the evidence that it has heard.
 25 MS BLACKWELL: Yes.

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1 THE CHAIRMAN: Yes, very good.
 2 The question has been put and it has been answered.
 3 MS BLACKWELL: Thank you.
 4 THE CHAIRMAN: Thank you.
 5 Anything else, anybody?
 6 MS BLACKWELL: I believe not.
 7 Thank you, sir.
 8 THE CHAIRMAN: Silence is deafening.
 9 Tomorrow morning at 10.00?
 10 MS BLACKWELL: Yes, please.
 11 THE CHAIRMAN: Thank you all very much indeed.
 12 (4.44 pm)
 13 (The Inquiry adjourned until 10.00 am the following day)
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1 THE CHAIRMAN: That may be of assistance.
 2 MS BLACKWELL: It is, thank you very much for that
 3 indication.
 4 THE CHAIRMAN: Yes.
 5 MS BLACKWELL: My questions are these.
 6 At the moment that you fired your shot, you did not
 7 have any belief that Jermaine Baker was going for a gun.
 8 Is that the truth?
 9 **A. No, No, sir.**
 10 Q. And, furthermore, at the time that you fired your shot,
 11 you didn't have any belief that he was going towards his
 12 man bag with his hands?
 13 **A. No, sir.**
 14 Q. Your evidence is that he was?
 15 **A. He was.**
 16 THE CHAIRMAN: The way in which the purpose which lies
 17 behind the question is the evidence of the time, or lack
 18 of time, between whatever was shouted and the firing of
 19 the gun.
 20 MS BLACKWELL: Yes.
 21 THE CHAIRMAN: Yes, well I understand the way in which it is
 22 put and the reason that it is being put in that way.
 23 MS BLACKWELL: The issue as far as the family is concerned
 24 is to give this witness the opportunity to indicate
 25 whether or not he is telling the truth on those issues.

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