

OPUS2

Fishmongers' Hall Inquests

Day 1

April 12, 2021

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1 Monday, 12 April 2021
 2 (10.39 am)
 3 JUDGE LUCRAFT: Good morning, Mr Hough. Can I just say
 4 a few words before we have the panel of jurors brought
 5 into court.
 6 I am extremely grateful to all of the staff both
 7 here at the City of London, who have made the
 8 arrangements for these Inquests to happen in these
 9 difficult times. I have spoken to a number of the
 10 advocates who are here, but I repeat my request that if
 11 there are any difficulties hearing what is being said or
 12 seeing material, if they would please let us know.
 13 Mr Hough, I'm pleased to say that jury summonses
 14 were issued and we have had a very good response to the
 15 jury summonses, and a questionnaire which I know
 16 everyone has seen was shown to all of those who
 17 responded to the summons this morning, and from all of
 18 the potential jurors who turned up, we have 14 who have
 19 answered "no" to all of the questions that they have
 20 been asked, and they have made it clear that they have
 21 no difficulties with the timetable, which is to start
 22 from today through to Friday, 28 May.
 23 In a few minutes' time I will ask my clerk and usher
 24 to bring those 14 jurors in, and we will, from those 14,
 25 select 11 to form the jury for these Inquests.

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1 MR HOUGH: Thank you, sir.
 2 JUDGE LUCRAFT: Once the jury have been sworn, I am just
 3 going to say a few things by way of opening remarks,
 4 Mr Hough. I am going to set out what the role of
 5 a coroner is, a short summary of what this case
 6 involves. I will then say something about the
 7 interested persons and their legal representatives.
 8 I don't, at this stage, intend to pause simply for those
 9 advocates to stand, because I think as the process goes
 10 through, when an advocate is coming forward to ask
 11 questions the jury will see who it is who is here
 12 representing the interested person at the time.
 13 I will then say something about the purpose of the
 14 Inquests and the four questions that arise, the Record
 15 of Inquest, the procedure, and then some rules about
 16 jury service. Those are modelled on the guidance that
 17 was issued to all coroners a while ago and it largely
 18 mirrors what I would be saying in the Crown Court about
 19 jury service.
 20 Then I'm going to say something right at the end of
 21 my opening about the order of the evidence that's going
 22 to be called, before finally just saying something about
 23 the impact of the pandemic. I will, when I come in to
 24 court and when I leave, I will put a mask on myself.
 25 Can I simply encourage all advocates when they are

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1 moving around the building please to do the same thing,
 2 it is just a way of reassuring people that we are all
 3 trying to do our very best. We are fortunate here in
 4 that we can all be socially distant, that we don't need
 5 to wear masks when we are actually sitting in court but
 6 if I could ask people, please, otherwise to wear a mask
 7 it just helps the jury feel assured that we are doing
 8 our very best to do so.
 9 There is an overspill room downstairs, and again
 10 I have got a clear picture of that room, so I can see
 11 what is occurring down there, and I hope, as I say,
 12 everything I'm saying at the moment is being heard
 13 downstairs.
 14 MR HOUGH: I am sure we will hear from people in that room
 15 if it is not.
 16 JUDGE LUCRAFT: Yes.
 17 So, Mr Hough, unless there are any other matters,
 18 I will ask my clerk and usher to go and get the 14.
 19 Just whilst they are doing that, it has been suggested
 20 that there should be a photograph or some photographs
 21 taken of the layout of the court, simply to assist
 22 people understanding how we have adapted the process.
 23 For my part, I'm happy to authorise that to happen, but
 24 so that we don't inadvertently capture any juror on that
 25 image or, indeed, any members of the families who don't

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1 wish to be on that image, I'm going to suggest that the
 2 photograph is taken immediately after the lunch
 3 interval, before the jury come back into court, and
 4 again, if anyone has got any concerns about that, please
 5 let me know via the Inquest team.
 6 MR HOUGH: Thank you, sir.
 7 (Pause)
 8 JUDGE LUCRAFT: Good morning, I hope you can all hear me,
 9 even if you can't actually see me. The arrangements in
 10 the hall are such that you are all standing, I hope, on
 11 white squares, so I know where you all are.
 12 There are 14 of you, and in a moment my clerk is
 13 going to read 11 names selected at random to form the
 14 jury for these Inquest hearings that are going to start.
 15 I know from the summonses you have all attended here
 16 today, and this morning you have filled in
 17 a questionnaire, which I have got in front of me. You
 18 have been asked a number of questions about, first of
 19 all, the dates running up to 28 May of this year, and
 20 then you have been asked a number of questions about
 21 knowledge or connection with certain names and
 22 individuals, all of which you have answered "no" to, but
 23 you have said "yes" when it comes to the time span.
 24 If your name is called by my clerk, could you do two
 25 things: first of all, could you say "yes", or raise your

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1 hand, and then, please, just follow the direction from
 2 my usher to one of the seats. The jury seats are just
 3 behind the lady who is standing right in front of me.
 4 If you just turn around, you will see there are seats
 5 there, separated again by some plexiglass to make sure
 6 that you are all safely separated from each other and
 7 from all of us.
 8 I will have a few more things to say in a moment
 9 about the arrangements, but to start off with my clerk
 10 will select, as I say, 11 of you by random selection
 11 from the 14 to fill the 11 seats. Thank you very much.
 12 (Jury selection)
 13 JUDGE LUCRAFT: Thank you. So we've now got 11 people
 14 sitting in the jurors' seats. Those who are sitting
 15 there, it's a matter entirely for you: if you wish to
 16 take your mask off at any time, you are free to do so;
 17 if you wish to keep it on, equally, it's a matter
 18 entirely for personal choice because you are separate
 19 from each other.
 20 We are all going to wear our masks when we move
 21 around the building, just so we make sure that we stay
 22 safe. You will see various people sitting around the
 23 room and I will introduce them all to you in a moment.
 24 The next thing that is going to happen is that my clerk
 25 will read your names again, and I will ask you, please,

1 to each take an oath or an affirmation from the card
 2 that's in front of you. Thank you.
 3 (Jury sworn)
 4 Opening statement by His Honour Judge Lucraft QC
 5 JUDGE LUCRAFT: Thank you very much indeed, ladies and
 6 gentlemen, you have all now taken an oath or
 7 an affirmation.
 8 My name is Mark Lucraft. I am the
 9 Recorder of London, a former Chief Coroner of England
 10 and Wales, and the coroner for these Inquests.
 11 These Inquests are into the deaths of two young
 12 people, Jack Merritt and Saskia Jones. They both died
 13 on 29 November 2019. This hearing concerns their deaths
 14 that occurred following an attack by Usman Khan at
 15 Fishmongers' Hall in the City of London that day.
 16 The role of the coroner is to investigate violent or
 17 unexplained deaths. In England and Wales, the office of
 18 coroner has existed for almost a thousand years.
 19 Evidence of the office dates to the reign of Richard I
 20 in 1194, but it may well have earlier origins.
 21 As you might expect, the role of the coroner has
 22 developed and changed over the centuries. Initially the
 23 office was closely connected to revenue—collecting on
 24 behalf of the monarch. As time went on, it focused on
 25 the investigation of the cause of death. There are now

1 approximately 120 full-time coroners, and 300 part-time
 2 coroners in post today. Each is an independent judicial
 3 office-holder, overseeing investigations into deaths
 4 reported to them.
 5 Due to the impact of the coronavirus pandemic, we
 6 have all become accustomed to seeing the numbers of
 7 recorded deaths each day or week from the virus, as well
 8 as seeing figures for what is sometimes called the
 9 "normal death rate". Although we may not give it much
 10 thought in normal times, we all know that deaths must
 11 happen all the time, but I suspect few of us really give
 12 much thought to the numbers of people who die each day
 13 of each year in this country before it was displayed so
 14 openly on our TV screens and in our newspapers.
 15 If we go back to 2019 when the attack that led to
 16 the deaths at the centre of these Inquests occurred,
 17 before the pandemic, in that year — that's 2019 —
 18 there were some 530,857 deaths registered in England and
 19 Wales. Of those deaths, some 210,900 were reported to
 20 a coroner. 30,000 inquests were opened by coroners in
 21 2019.
 22 Where death is reported to a coroner but there is no
 23 inquest, the reason is that the coroner, after making
 24 some inquiries into the circumstances of the death, is
 25 satisfied from the answers that the death was not

1 violent or unexplained, but was, in fact, from natural
 2 causes.
 3 Many of the inquest hearings that took place will
 4 have taken an hour, a few hours or, at most, a day to
 5 resolve. Very few span days or even weeks. There are
 6 approximately 500 inquests each year that take place, as
 7 here, with a coroner and a jury. In 2019, there were
 8 just 527 jury inquests.
 9 A little background to this particular inquest. On
 10 29 November 2019, a number of people attended an event
 11 at Fishmongers' Hall. Jack Merritt and Saskia Jones
 12 were two of those attending that event. The event had
 13 been organised by Learning Together. Learning Together
 14 is a national organisation founded in 2014, dedicated to
 15 the rehabilitation and education of prisoners. It is
 16 associated with the University of Cambridge, and it runs
 17 various courses in several prisons.
 18 The event on 29 November at Fishmongers' Hall was
 19 attended by a variety of people associated with the
 20 organisation, including supporters of the organisation,
 21 current, and former prisoners. Saskia was a former
 22 Cambridge criminology student who sometimes attended
 23 Learning Together events, and Jack, a former Cambridge
 24 undergraduate who was employed by the university in the
 25 Learning Together programme.

1 As you will hear, Jack Merritt and Saskia Jones were
 2 both attacked by one of the other attendees at the event
 3 in Fishmongers' Hall. Their attacker was a man called
 4 Usman Khan, a former terrorism offender. Both Jack and
 5 Saskia received stab wounds that proved to be fatal.
 6 Two other attendees were also attacked and seriously
 7 injured: Stephanie Szczotko and Isobel Rowbotham; they
 8 survived the attacks on them. Others were less
 9 seriously hurt.

10 A number of those present set upon Khan, attacking
 11 him with items, including a decorative pike, narwhal
 12 tusks, and a fire extinguisher. Khan confronted
 13 a maintenance engineer and threatened him, forcing the
 14 engineer to use his fob to allow Khan out of the
 15 building. Once he was out of Fishmongers' Hall and on
 16 London Bridge, Khan was attacked by other attendees of
 17 the event and by members of the public, forcing him to
 18 the floor and kicking the knives he was holding from his
 19 grip.

20 Armed police officers were soon on the scene and
 21 directed members of the public away. Khan was wearing
 22 what appeared to be a suicide vest. He was shot and
 23 tasered. As his death was the result of actions of
 24 police officers, his death will be the subject of
 25 a further and separate inquest with a different jury

1 after these inquests have concluded. All of those
 2 attacked in Fishmongers' Hall received first aid.
 3 Initially this was from bystanders at the event, and
 4 then from the emergency services who responded. Despite
 5 all the efforts that were made, sadly, both Jack and
 6 Saskia died.

7 For these Inquest hearings, ladies and gentlemen,
 8 I have the assistance of Mr Jonathan Hough QC, who sits
 9 on the stage in front of me, and Mr Aaron Moss, who sits
 10 to my right. They are leading and junior counsel to
 11 these Inquests. They are assisted by Ms Sinéad Lester
 12 and Ms Natasha Davis of BDB Pitmans, the solicitors to
 13 these Inquests.

14 There are no parties to an inquest, but there are
 15 interested persons, people and organisations who have
 16 the right to play a part, including by questioning
 17 witnesses. I will briefly set out the interested
 18 persons and their legal teams.

19 The family of Saskia Jones are represented by
 20 Mr Henry Pitchers QC, Philip Rule and Ramya Nagesh. For
 21 the family of Jack Merritt, we have Nick Armstrong and
 22 Jesse Nicholls. Mr Matthew Butt QC and Genevieve Woods
 23 represent the Metropolitan Police Service.
 24 Ms Fiona Barton QC represents the City of London Police.
 25 Elliot Gold represents British Transport Police.

1 Staffordshire Police are represented by Mr Gerard Boyle
 2 QC and Ms Louisa Brown. The West Midlands Police are
 3 represented by Mr Jason Beer QC and Ms Georgina Wolfe.
 4 Staffordshire Prevent Team officers are represented by
 5 Kevin Baumber, and the Independent Office for Police
 6 Conduct by Danny Simpson. Ms Samantha Leek QC, Mr
 7 Neil Sheldon QC and Ms Francesca Whitelaw represent
 8 Secretary of State for the Home Department and the
 9 Secretary of State for Justice. Ms Gemma Brannigan
 10 represents the London Ambulance Service, and
 11 Mr Sebastian Naughton represents Barts NHS Trust. For
 12 Cambridge University we have Nicholas Griffin QC and for
 13 the Fishmongers' Company, Sarah Le Fevre. For the
 14 City of London Corporation, we have Stephen Morley.

15 Can I then say something next about the purpose of
 16 the Inquest. An inquest hears evidence so that you, the
 17 jury, can make findings of fact and come to conclusions
 18 about the deaths. Formerly a conclusion was known as
 19 a verdict, but we now use the word "conclusion" to
 20 distinguish the inquest process from a criminal trial:
 21 nobody is on trial here. An inquest does not decide
 22 matters of criminal liability of individuals or civil
 23 liability. There is no question of attributing blame in
 24 that way. The inquest is simply a way of establishing
 25 facts about the deaths of Jack and Saskia.

1 These Inquests were due to have taken place in court
 2 number 1 at the Central Criminal Court, or the Old
 3 Bailey, as it is more commonly known, but due to the
 4 impact of the pandemic, we are using the impressive
 5 setting of the Guildhall of the City of London. I am
 6 grateful to the Corporation of the City of London for
 7 allowing us to use this hall, and a number of the
 8 adjoining rooms for these Inquests.

9 Your role in this inquest hearing is to answer four
 10 main questions about each of the two people who died:
 11 one, who was the deceased? Two, when did he or she come
 12 by his or her death? Three, where did he or she die?
 13 And, four, how did he or she come by his or her death?

14 The last question, how did he or she come by his or
 15 her death, is the most significant one in this, as in
 16 most inquest hearings. I shall give you legal
 17 directions in due course about the scope of that
 18 question and how you are to answer it.

19 You are required for each of those who died to
 20 record particulars, registering the death, such as the
 21 date and place of birth and occupation. You are not
 22 allowed to express an opinion on any other matters.
 23 Your determination may not appear to determine any
 24 question of criminal liability of a named person or any
 25 question of civil liability.

1 In due course, you will be asked to complete and
 2 sign two documents called "Records of Inquest", one for
 3 each of the two, Jack and Saskia, and each setting out
 4 your findings and a conclusion about the death. That
 5 will include the medical cause of death, and your other
 6 findings about how each came by his or her death.
 7 I will give you further directions about these matters
 8 towards the end of the inquest hearing, including what
 9 options are open to you, and how to record your
 10 conclusions.

11 Next I'm going to say something about the procedure
 12 and the process. Soon we will embark on hearing the
 13 evidence in this inquest hearing, all of which will be
 14 recorded. Counsel to the Inquest will take each witness
 15 through their evidence. Interested persons may ask
 16 questions through their counsel. I may ask questions
 17 myself from time to time. After that, you may ask
 18 questions to clarify matters, if you wish. Here
 19 I expect that all the relevant questions will be put by
 20 counsel, but if you do have a question you would like
 21 asked, then please write it down and pass it to me.
 22 I have a duty to exclude any question that is not
 23 relevant for the purpose and scope of these Inquests.

24 It is possible that some evidence may be read to you
 25 without the witness having to come to court. If that

1 happens, it will be likely because nobody has required
 2 their attendance and their evidence is not in dispute.

3 At the end of the evidence, I will sum up the case
 4 to you. I will give you written directions on the law,
 5 indicating what conclusions you may consider, and what
 6 factual findings are required to support them. I will
 7 also summarise the evidence that has been presented to
 8 you, reminding you of key parts of it. Some of you may
 9 wish to make your own brief notes during the evidence.
 10 At the end of my summing-up, I will then invite you to
 11 retire and to consider your findings and your
 12 conclusions.

13 One or two rules for jury service. First of all,
 14 please do not talk to anyone outside your number about
 15 this case. When you get home tonight, friends and
 16 family who know that you have started service as a juror
 17 on an inquest will want to know all about it. It's very
 18 important you do not discuss anything about the inquests
 19 with anyone. The reason is simply this: that if you
 20 have friends or family like some of mine, they will only
 21 be too happy to give you the benefit of their opinion,
 22 unencumbered by any knowledge of the evidence. That may
 23 affect you, even subconsciously, and would be unfair.
 24 You do not decide the issues in these Inquests with your
 25 other jurors and your mum or your best friend: you

1 decide the issues with the other jurors alone. If
 2 friends or family ask, simply tell them it is a rule to
 3 ensure fairness and you are not by law permitted to
 4 discuss it during the Inquests. Of course, when the
 5 inquest hearing is over and you have delivered your
 6 findings and conclusions you may have discussed your
 7 experiences, but not your deliberations, with your
 8 family and friends.

9 During the case, if you happen to travel to this
 10 building with a fellow juror, or you happen to bump into
 11 another of them away from court, please do not discuss
 12 the evidence you have heard. Any discussions you have
 13 about the case should be whilst in the privacy of the
 14 jury room when all members of the jury are present.

15 Press coverage. There has been extensive reporting
 16 of the incident behind these Inquests. There will be
 17 reporting of this case in the press. The press are
 18 entitled to publish reports of legal proceedings that
 19 are held in public. There are rules governing those
 20 reports. It is highly likely that you will see or hear
 21 some of those reports. However good the press reports
 22 are, they are unlikely to report all of the evidence
 23 that is given in this court. Each of you has taken
 24 an oath or affirmation to deal with these Inquests on
 25 the evidence, and it is on the evidence you will hear in

1 court that you will make your decisions.

2 To ensure fairness, can I ask that each of you make
 3 sure that your focus is on what is said in this court in
 4 your presence. Next, please do not make any of your own
 5 investigations. Do not be tempted to make of your own
 6 investigations into the background of this case. You
 7 and I are fortunate as we have experienced and competent
 8 advocates to put all of the relevant evidence before you
 9 and to rehearse all of the relevant issues for you to
 10 consider. Sit back and let them do the hard work in
 11 presenting the evidence before you.

12 Why is this rule so important? Well, because our
 13 whole system of justice relies on open justice. All
 14 those in this courtroom and the public are entitled to
 15 know and hear all the evidence on which you have reached
 16 your decisions. It's a question of fairness again.

17 If you were to introduce into the jury room the
 18 fruits of your own investigations, be they on the
 19 internet, Facebook or Twitter, then they would not have
 20 been tested in open court for all to see and hear. We
 21 all know how wonderful the internet is, and how useful
 22 search engines such as Google can be, but we also all
 23 know how unreliable they can sometimes be, seemingly
 24 authoritative pages on the internet can turn out to be
 25 completely false. The simple rule is, do not make any

1 of your own investigations. Of course, this does not
2 mean you cannot use the internet for your personal
3 affairs. It simply means do not use it to investigate
4 the facts of this case.

5 You may have heard on the news of jurors who have
6 ignored directions such as these and have been sent to
7 prison. You may also know that Parliament has enacted
8 specific offences of juror misconduct. These include
9 the offences of a juror researching a case, sharing that
10 research with jurors or engaging in prohibited conduct.
11 The last thing I want is for one of the jurors who is on
12 these Inquests should commit any offence in connection
13 with their jury service, and that's why I have given you
14 these instructions, and I will remind you from time to
15 time during the Inquests about these rules.

16 You all have a joint responsibility as jurors to see
17 that what goes on in your retiring room is in accordance
18 with the legal directions that you are given.

19 Very rarely something may happen, either outside
20 your jury room, for example, someone who is not on the
21 jury may apparently try to speak to you about the case,
22 or something may happen in the jury room itself which
23 causes you real concern. If any of you has such
24 a concern, please inform me about it at once, discreetly
25 in a written note via the court clerk or the usher.

17

1 Please do not leave it until the case is over, because
2 it might then be impossible to put matters right.

3 We are hearing these Inquests together. I am the
4 judge of the law, and you are the judges of the facts.
5 When matters of law arise, I will deal with those in
6 your absence. As I have indicated, at the end of the
7 evidence, I will give you directions on the law and
8 provide you with a summary of the evidence that has been
9 given in court.

10 Finally, please keep an open mind: the evidence will
11 be presented to you over the coming days and weeks. Do
12 not jump to conclusions. The time to come to any
13 conclusions is once you have heard all of the evidence,
14 the summing-up, and you are in the privacy of your room.

15 I am just going to say a few words next, ladies and
16 gentlemen, about the order of the evidence, because
17 we're going to start hearing some evidence in a few
18 minutes' time.

19 In broad terms, the evidence will be called in the
20 following order: firstly, the families of those who died
21 have been given the opportunity to read a statement or
22 provide a pen portrait. There will be a statement read
23 for Saskia Jones, and a pen portrait read for
24 Jack Merritt.

25 Detective Chief Inspector Dan Brown, the senior

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1 investigating officer for this investigation into the
2 events on 29 November will then give evidence to provide
3 background for our inquiry. He will cover the events in
4 Fishmongers' Hall and those immediately outside the
5 hall. We will then see some video footage of the
6 events. Some of it will inevitably be quite graphic,
7 although I should make clear that care has been taken to
8 avoid showing the most graphic footage of the victims of
9 this attack.

10 However, it is right you should understand the
11 background to the scene which took place. After that we
12 will hear from some of those in attendance at the event
13 in Fishmongers' Hall, including a retired judge. We
14 then turn to witnesses concerning the attack on
15 Jack Merritt, and the emergency care efforts. Next we
16 will turn to the attack on Saskia Jones, and the
17 emergency care she received. We will then turn to
18 further witnesses of the attack within
19 Fishmongers' Hall.

20 We will then turn to the events outside
21 Fishmongers' Hall on London Bridge, when the attacker
22 had left and was confronted by various people. We will
23 then deal with the arrival of the armed response
24 vehicles, and that will be covered, as will the
25 confrontation with the armed officers.

19

1 We shall hear evidence concerning the involvement of
2 Usman Khan with Cambridge University and
3 Learning Together, and those involved with the event
4 from Fishmongers' Hall and the City of London.

5 Expert evidence will deal with the post mortem
6 examinations and the pre-hospital care. There will be
7 toxicological evidence concerning Usman Khan.

8 DCI Brown will then be recalled to deal with the
9 life and background of Usman Khan and his preparation
10 for the attack. As part of this phase, one or more
11 members of Usman Khan's family will be called.

12 We then turn to witnesses concerning Usman Khan's
13 involvement with various state agencies including
14 several witnesses from the prisons he was held at,
15 probation officers, mentors, counter terrorism officers,
16 and Prevent officers. As part of this chapter, we shall
17 hear from a witness from the security services and
18 officers from Staffordshire Police.

19 Our focus will then turn to the operational response
20 of the emergency services to this attack on 29 November.
21 At present we expect the evidence will continue until
22 around 18 May. I shall then give you final directions,
23 probably on Friday, 21 May, and Monday 24 May, before
24 then asking you to consider your conclusions.

25 The plan is that we will aim to start each day at

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1 10 o'clock, sitting no later than about 4.30. There
2 will be mid-morning and mid-afternoon breaks of about
3 15 minutes each, and a lunch break each day from 1.00 to
4 2.00. There will be a few days when we do not expect to
5 be sitting, they are mostly Fridays and the first of
6 those will be this coming Friday.

7 One added complication for these hearings is the
8 impact of the pandemic. We have done our very best to
9 seek to allay the concerns for all of those attending
10 these hearings by setting out this hall in such a way so
11 that we can abide by the requirements of social
12 distancing. Please do pay close attention to the
13 arrangements that have been made for your safety and for
14 all other attendees for these hearings.

15 If any of you has any concern at any stage about the
16 arrangements, please do bring it to my attention through
17 my clerk, Laura, or my usher, Jo, who will look after
18 you during the course of these hearings.

19 Mr Hough, that is all that I wanted to say at this
20 stage by way of opening for the jury, and I'm going to
21 turn to you now to take both myself and the jury through
22 the various parts of the evidence that we're going to
23 hear.

24 MR HOUGH: Well, sir, first of all, as you have indicated,
25 we will be hearing a pen portrait of Jack Merritt, and

21

1 a statement in relation to Saskia Jones.

2 JUDGE LUCRAFT: Yes.

3 MR HOUGH: So I don't know in which order you had in mind to
4 hear those.

5 JUDGE LUCRAFT: What I would suggest, if we hear the
6 statement in relation to Saskia Jones first of all, and
7 I think Mr Pitchers is going to read that.

8 MR HOUGH: Yes, that's correct.

9 JUDGE LUCRAFT: Mr Pitchers, if you don't mind, I'm going to
10 use you as a slight guinea pig just to explain the
11 process.

12 MR PITCHERS: Yes.

13 JUDGE LUCRAFT: Because of the size of the hall, because of
14 sight lines and various other things, you mean no
15 discourtesy to anyone by having your back to them, but
16 the fact of the matter is that we do have the facility
17 to show on a screen your face whilst it is that you are
18 reading a statement and, indeed, when you come to ask
19 any questions, the jury will have your back to them as
20 it were, but they will see you on a screen and they will
21 be able to see the witness, and that will be the process
22 we adopt for all the witnesses, and at the moment as
23 I say, you are going to read a statement, and I will let
24 you do so.

25 If you want to tell us who is here on behalf of

22

1 Saskia's family at the same time, please feel free to do
2 so.

3 Statement read on behalf of the family of Saskia Jones
4 MR PITCHERS: Sir, yes, we have from the family of Saskia,
5 Michelle, her mother, and her two uncles and aunt.

6 This is the statement on behalf of the family. The
7 family of Saskia has taken the decision not to do a full
8 portrait for her today as it would fly in the face of
9 Saskia's private nature. They believe that she would
10 wish the focus of the coroner and the jury to be on the
11 facts and evidence before them, and for the emphasis to
12 be on a thorough investigation as to how she came to
13 lose her life. It would be her hope that no other
14 family is devastated and heartbroken again in similar
15 circumstances.

16 It's very important to the family that Saskia's
17 legacy should not solely be based on her work with
18 Learning Together, as she was about so much more than
19 just that. She should be defined as someone who battled
20 to improve the lives of others in several spheres and
21 was driven to make real changes in the world.

22 Her incredible research in the field of sexual
23 violence with Rape Crisis Cambridge more than shapes
24 part of that legacy. Her passion in this area enabled
25 her to finally find her career path, with the hope of

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1 becoming a detective in victim support within the police
2 force.

3 The positive impact Saskia had on so many people in
4 challenging situations provided a valley of light for
5 them to seek hope and a way forward. The grief and loss
6 of the family and friends of Saskia continue to endure,
7 is personal to them, and it's their wish that it remains
8 so.

9 JUDGE LUCRAFT: Mr Pitchers, thank you very much for reading
10 that, and I entirely understand the sentiments which are
11 expressed in that statement. Thank you.

12 Mr Hough, I think we are next going to turn to a pen
13 portrait on behalf of Jack Merritt. Good morning.

14 Pen Portrait of Jack Merritt

15 MRS ANNE MERRITT: Hi. Jack Merritt was a good person.
16 Jack was a force of good in the world, someone who made
17 other people's lives better for knowing him. We have
18 said many things about Jack, our son, but we felt the
19 best way to paint a picture of him is through the words
20 of those who knew and loved him.

21 From Sarah, landlady of The Punter Pub in Cambridge:

22 "It has been the saddest and most traumatic few days
23 that we have ever known at The Punter. Jack worked here
24 for a short time but, more importantly, has been part of
25 a friendship group that has called this place their

24

1 second home for some years, so when the terrible news
2 travelled of Jack's death, the friends appeared, on
3 foot, on bike, jumping from cabs, streaming in. This
4 glorious bunch of young people that I have been lazily
5 telling off for years clung together in such desperate
6 sadness. The love for this young man, the admiration,
7 the shared humour, the sense of a combined grief was
8 overwhelming.

9 "Jack dressed like his favourite pint of Guinness,
10 pristine white T-shirt, pressed black jeans, and black
11 Doc Martins. For sure, Jack Merritt was destined to do
12 great things, but his swagger was so far from
13 superficial. This young man was bloody clever, had full
14 ownership of a sound moral compass, and the intellectual
15 might to challenge the norm. My sons and their friends
16 are devastated by the loss of him, as are we all."

17 From Joanna:

18 "You think as a teacher that you will love all the
19 children you teach. You don't. You think that you will
20 remember them all and you don't. But I loved Jack and
21 I remembered him. When I heard the news of his death,
22 the first thing I did was send a message to my colleague
23 saying 'please, please tell me that's not our lovely
24 Jack'.

25 "At the end of summer term, celebrating the end of

25

1 primary school, the children were listening to 'Hey Ya!
2 by Outkast and everyone was crying and singing. Jack
3 suddenly jumped on to a table to dance and everyone
4 followed suit, all the crying forgotten. That was the
5 thing about Jack: I am sure he had his flaws, as we all
6 do, but what I admired so much about him was that he
7 just didn't care what anyone thought of him, and yet
8 simultaneously he cared so very, very deeply about
9 others. It's a rare but irresistible combination that
10 hardly any of us achieve, and especially not from
11 a young age. He did."

12 From Hollie:

13 "You were such a completely brilliant boy. You
14 could have done anything, literally anything, but you
15 chose to help others. You championed the underdog. You
16 did all you could to get voices heard. It scares me to
17 think that your voice is now lost, your reasonable,
18 sensible, passionate voice could get lost in this mess.
19 I want so much. I wanted so much for you. Your life
20 had so much enjoyment in it and you gave us all so much
21 happiness. Often I wake and I can't find words to
22 explain my loss.

23 "Jack supported me through the worst mental health
24 crisis I have had. When I told him I had PTSD, he
25 simply asked how he could help. He picked me up for

26

1 social occasions because I was too anxious to walk. He
2 brought me breakfast when I couldn't find my way to the
3 shops. He mapped my route when I couldn't find my way
4 out of the house. He took me to therapy. He picked me
5 up from work when I had panic attacks. He helped me
6 recover. I am better because of Jack. He was so
7 unbelievably brilliant, my best friend. I won't find
8 another Jack."

9 From Lewis and friends:

10 "Jack was extremely funny and had moments of
11 complete hilarity. When we were all together, all that
12 ever mattered was having the biggest laugh possible,
13 which normally involved ridiculing several of his
14 closest friends. Jack had a thirst for being a part of
15 absolutely everything, and would travel the length and
16 breadth of the country for his mates. He attended every
17 festival, every pub session, every gig, every night out,
18 and every holiday. He couldn't be stopped. Jack was
19 also immensely loyal as a friend. He had an appetite
20 for long and rambling phone conversations on a daily
21 basis. He would start doing the rounds on a Monday,
22 during his lunch break or whilst driving home from the
23 gym, to make plans for the coming weekend almost before
24 the last one had finished.

25 "Whilst Jack was at the heart of this group, we

27

1 consistently excelled in enjoying ourselves for nearly
2 a decade. As a group, we toiled for years over the
3 ingredients and techniques needed for managing the
4 effects of overindulgent times. He had a passion for
5 the right TV, the right company, the right snacks and
6 drinks for surviving a Sunday, and getting back to work
7 on a Monday.

8 "Many of our great stories and laughs come from
9 those moments of agony which we spent so many of our
10 days of our lives in throughout sixth form, university,
11 glorious summers and bracing winters, on trains, planes
12 and airport floors, wherever we rolled in. From now
13 we'll proudly take Jack's incessant lust for life into
14 everything we do."

15 From Leanne:

16 "As many of you will already know, as soon as Jack
17 and I met we were pretty inseparable. In true Jack
18 style, our first date was Masterchef, with three large
19 pizzas because two might just not have been enough.
20 Jack fit perfectly into my life and was my biggest
21 support and number one fan. He always got me through
22 the really tough times when I really didn't believe
23 I could myself. He made me feel it was possible to
24 achieve anything and everything. I will miss the skip
25 in your step and your huge famous Jack Merritt smile

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1 that somehow produced those ceases and dimples all over
2 your face. I will miss you asking me every day if you
3 still look hench and the ridiculous conversations we had
4 about you wanting to be 100 kilograms."

5 From Joe:
6 "Jack was never afraid to express himself to do
7 something different to those around him. Our parents
8 raised us around music and art, dragging us to numerous
9 festivals, galleries and exhibitions which rubbed off on
10 me and Jack in our own ways. It encouraged us to
11 express ourselves as individuals and never be afraid to
12 be different. From a young age this was very apparent
13 and manifested itself through Jack's many phases: his
14 grunge rock phase, his indie phase, or my favourite, the
15 Eminem phase, paired with his distinctive bleached hair.

16 "I always looked up to Jack because of this, he was
17 a very cool brother to have, and I loved everything he
18 owned. I remember countless arguments with Jack where
19 he would catch me wearing his clothes or borrowing
20 things from his room, but I couldn't help it. Something
21 I never admitted to Jack is how much he influenced my
22 style, from how I dress, to the music I listen to, and
23 for that I'll be forever grateful".

24 From Manchester University housemates and friends:
25 "Jack was with us on this journey to become adults,

1 bounding along in his black Doc Martins and silver hoop
2 earrings, with his infectious smile, huge bear-hugs and
3 never-ending passion and drive for life. Some of the
4 most memorable stories are of pancake day where he
5 insisted we have chilli and cheese pancakes, his mango
6 chilli margaritas in Crazy Pedro's and his repeatedly
7 coming into university and convincing us that his new
8 plain white T-shirt was actually a limited edition.

9 "We will never stop being amazed by Jack graduating
10 with a first when we are absolutely certain he didn't
11 set foot in the library. His wit and intellect drove us
12 all to be better, getting even the armchair activists
13 out of their seats. His passion and genuinely
14 intelligent insight into so many things really have
15 shaped our world view, and impacted many of our careers.

16 "It was clear that Jack was intelligent, but when he
17 started to study miscarriages of justice in further
18 detail, it became clear how strongly Jack felt about
19 criminal justice."

20 From Laura and Lewis, Cambridge University friends:
21 "Jack was proud. Jack was absorbingly intelligent,
22 fiercely loyal. Jack loved music, art, eating good food
23 with his family and more than one pint with his mates,
24 oh, and if you hadn't realised by now, he was also
25 devilishly handsome.

1 "But Jack was also angry, frustrated, selfless and
2 stubborn. He was angry because he saw our society
3 failing those most in need. He was frustrated because
4 the political elite have forgotten what it is to be
5 fair. He was selfless in his dedication to make things
6 right in every second of his life."

7 From Steve and Ryan, Learning Together students and
8 mentors:

9 "When someone connects with you on a human level and
10 shows interest in you as a person, regardless of your
11 crime, this increases your self worth, a vital
12 ingredient for building hope, and where hope resides, so
13 does the ability to envisage a better life beyond
14 prison. Whilst working with him, the most important
15 thing we ever learned is that role models don't have to
16 follow the traditional route of an older person showing
17 a younger person the ropes. Despite his age, his hard
18 work continues to inspire us. The world has lost one of
19 its true visionaries and he will be greatly missed. We
20 are certainly the richer for having him in our lives."

21 From the Longford Trust:

22 "We will never forget the buzz of joy and hope in
23 that room at Warren Hill. Jack was at the centre of
24 that, embodying a belief in the good in people.

25 A particularly eminent lawyer wiped his eyes as he

1 listened. Jack spoke the truth, capturing the essence
2 of why we all owe it to those who are in prison to find
3 a way back into society, to provide hope.

4 "Over drinks with Jack on a hot summer evening after
5 a conference in Brixton Prison, we enjoyed his company,
6 pint in hand, wearing shorts and kicking back with
7 international academics and former prisoners alike.
8 Jack lived his beliefs. He walked the walk."

9 And in Jack's own words:

10 "When you learn in an atmosphere of mutuality,
11 support and positive expectation, where the peaks are
12 celebrated and the pains are permitted and shared, it
13 can be transformative for the individuals involved and
14 for the society they form together. This description of
15 the Learning Together experience rings true of my own
16 experiences on the course, and is exactly what I want
17 for all of our students. This is why this work is so
18 important to me."

19 This small selection of the tributes that we
20 received from those who loved, respected and cherished
21 Jack, talks to the impact that Jack had in such a short
22 life. There are hundreds more. We are hugely proud of
23 who Jack was and what he stood for. His death was
24 a tragedy, but his life was a triumph.

25 JUDGE LUCRAFT: Thank you very much indeed.

1 Mr Hough, I'm going to suggest that would be
 2 a convenient time for us to take just a break whilst we
 3 just reflect on what has been said about both these
 4 young people.
 5 MR HOUGH: Yes, indeed, sir.
 6 JUDGE LUCRAFT: Ladies and gentlemen, this will be our first
 7 break. My usher will direct you to where you are to go
 8 and we will sit again in about 20 minutes' time. Thank
 9 you very much.
 10 (11.46 am)
 11 (A short break)
 12 (12.13 pm)
 13 JUDGE LUCRAFT: Mr Hough, I'll just explain. The jury have
 14 had a longer break than I had planned, but I think it's
 15 quite important on Day 1 that they find their feet.
 16 MR HOUGH: Yes, sir.
 17 (In the presence of the jury)
 18 JUDGE LUCRAFT: Welcome back, ladies and gentlemen. We had
 19 a slightly longer break because I was quite keen for you
 20 just to find out where you are going to be having your
 21 breaks and the facilities that there are there, but we
 22 are now in a position, Mr Hough, I think, to hear from
 23 the first of the witnesses who are going to be called.
 24 MR HOUGH: Yes, may we please have DCI Dan Brown.
 25

1 DCI DAN BROWN (sworn)
 2 Questions by MR HOUGH QC
 3 THE WITNESS: Good morning, sir. My name is Detective Chief
 4 Inspector Dan Brown and I'm currently attached to SO15,
 5 the Counter Terrorism Command of the
 6 Metropolitan Police.
 7 MR HOUGH: Thank you. DCI Brown, you understand I will be
 8 asking you questions first on behalf of the Coroner, and
 9 then you may have some questions from other advocates
 10 tomorrow.
 11 You have told us that you are attached to the
 12 Counter Terrorism Command of the Metropolitan Police.
 13 In that capacity, have you been the senior investigating
 14 officer for Operation Bemadam, the investigation into
 15 the attack at Fishmongers' Hall?
 16 A. That's correct, yes.
 17 Q. I think you understand you are giving evidence today and
 18 tomorrow to summarise the events of the attack and your
 19 team's investigation, and to introduce us to various
 20 visual aids?
 21 A. Yes.
 22 Q. We will be making use of your SIO overview report,
 23 which, for the lawyers, is {DC6603}, and I think you are
 24 also aware that you are scheduled to give evidence later
 25 in the Inquests concerning Usman Khan's life and

1 background and his preparations for the attack.
 2 A. Yes.
 3 Q. Looking at the first two pages of your report, can you
 4 summarise to us briefly the investigative strands of the
 5 police response to this attack?
 6 A. Yes, there were three strands. Initially it was to
 7 identify and mitigate the risks from any other
 8 outstanding individuals who may be involved in this, or
 9 potentially may be involved in the attack. Secondly was
 10 the actual investigation into the events of the day, so
 11 a timeline of what happened on that day. Then finally
 12 was to investigate the motivation for the attack and the
 13 planning and preparation carried out by Khan leading up
 14 to what he did at Fishmongers' Hall.
 15 Q. Have you led the second and third of those strands, the
 16 investigations into the attack and its planning and
 17 preparation?
 18 A. Yes.
 19 Q. May I begin with some basic facts about Usman Khan. Can
 20 you tell us a few basic biographical facts about him?
 21 A. Yes, Khan was born in Stoke-on-Trent on 10 March 1991,
 22 so he was 28 years old at the time of the attack. He
 23 was an individual that had previously been arrested for
 24 terrorism-related offences and in fact was convicted for
 25 those offences at the age of 19 in 2010. He spent eight

1 years in prison and was released from prison in December
 2 of 2018, where he was on various licence conditions as
 3 part of his original sentence.
 4 Q. Is it right that for the last year of his time in
 5 prison, Usman Khan became involved with the educational
 6 organisation, Learning Together?
 7 A. That's correct, yes. He took part in various courses
 8 run by the university within the prison that he was in
 9 at the time, and then post his release, he was also
 10 involved with that organisation.
 11 Q. And you have told us that he was released at the end of
 12 2018; where did he live on his release?
 13 A. He lived at a premises in Stafford, in Staffordshire.
 14 Q. You have told us that he remained in contact with
 15 Learning Together after his release. I think that
 16 involved, for example, filming a video for
 17 Learning Together in March 2019?
 18 A. Yes.
 19 Q. And also attending a Learning Together event at one of
 20 his own former prisons, Whitemoor, in June 2019?
 21 A. That's right, yes.
 22 Q. And the event we are concerned with was, I think,
 23 a Learning Together five-year anniversary alumni event
 24 in Fishmongers' Hall in the City of London?
 25 A. That's right. He was invited as one of the alumni.

1 Q. May I then turn to some biographical facts about
 2 Jack Merritt and Saskia Jones. The coroner has heard
 3 rather more personal evidence about each of those, but
 4 just to get some more mundane biographical facts from
 5 you, please.
 6 May we first discuss Jack Merritt, and if you can
 7 tell us some basic facts about his life .
 8 A. Yes, Jack was born on 1 October 1994, so he was 25 years
 9 old at the time of this attack. He had originally done
 10 his degree at Manchester University and then
 11 subsequently went on to take a master's degree in
 12 criminology at Cambridge University in 2017.
 13 At the time of the incident he was actually working
 14 for the Learning Together organisation as a course
 15 facilitator , so he was quite used to working inside
 16 prisons and in the prison environment.
 17 Q. So he was attending the Learning Together event in the
 18 capacity of a course coordinator or facilitator for the
 19 programme?
 20 A. Yes.
 21 Q. Is it right to say that Jack, in fact, knew Usman Khan
 22 reasonably before the event and had, in fact, exchanged
 23 communications with him?
 24 A. Yes, in a professional capacity.
 25 Q. Next, please, Saskia Jones. Can you tell us a little

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1 basic biographical information about her?
 2 A. Yes, Saskia was born on 12 February 1996, so she was
 3 23 years old at the time. She had completed her degree
 4 at Anglia Ruskin University before, again, going on to
 5 Cambridge University to complete a master's degree in
 6 criminology where she graduated in 2018.
 7 She was involved in a different capacity with
 8 Learning Together as a student as part of her master's
 9 degree where, again, she again she imparted some of
 10 their courses.
 11 Q. May we now turn to the location of the attack,
 12 Fishmongers' Hall. Can you sketch in a sentence or two
 13 that building, that location?
 14 A. Yes. So Fishmongers' Hall is one of the numerous livery
 15 companies within the City of London. It's a large,
 16 imposing building that is on the north bank of the River
 17 Thames. It's actually sited right next to
 18 London Bridge. London Bridge actually becomes King
 19 William Street outside the hall itself .
 20 Q. We can look at a couple of plans, if we may. Could we
 21 please have on the screen {DC8000/28}.
 22 Can we see here a plan view of the City of London
 23 showing London Bridge, and immediately to the north of
 24 London Bridge, on the west side, Fishmongers' Hall
 25 noted?

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1 A. That's right, yes. And it's probably worth pointing out
 2 that Lower Thames Street actually runs underneath the
 3 bridge.
 4 Q. We can see that more clearly on the next page,
 5 {DC8000/29}, if you bring that up.
 6 A. That's right, yes.
 7 Q. So the orientation on this plan is different , but we can
 8 see on the top left Fishmongers' Hall, the road that
 9 leads to King William Street from London Bridge running
 10 by Fishmongers' Hall, and Lower Thames Street below that
 11 road.
 12 A. Yes.
 13 Q. Can we also see over to the right of the picture, so the
 14 north end, near where we see the words
 15 "House of Fraser", a junction between Eastcheap and
 16 Cannon Street, which is where Monument tube station is.
 17 A. That's right, yes.
 18 JUDGE LUCRAFT: Mr Hough, can I just check, this is the
 19 first time we have looked at documents on the screen.
 20 I hope all the jury can see, comfortably, a screen.
 21 I am seeing lots of nods, that's good. Thank you.
 22 MR HOUGH: We have the facility to maximise parts of the
 23 screen if it helps.
 24 May we now look at the appearance of the building,
 25 {PH0002/6}. I think we can see here an aerial view

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1 looking over the front of the imposing livery hall, and
 2 just to the right we can see Lower Thames Street running
 3 beneath King William Street at the lower ground level.
 4 A. That's right, yes, and those steps are into the entrance
 5 hall of the main building.
 6 Q. Then if we can have {PH0002/8} of the same file on
 7 screen. We are now looking from an aerial view looking
 8 to the left , and can we see the River Thames flowing
 9 immediately next to the south side of the building?
 10 A. That's right, yes.
 11 Q. Then at page 9 of the same file, please, {PH0002/9}, we
 12 have now rotated to the south and we are looking across
 13 London Bridge, and we can see, I think, how close the
 14 river is to the building once again.
 15 Then {PH0002/13} of the same file, please, that's
 16 an aerial shot looking down over the building.
 17 A. Yes.
 18 Q. Then may we have on screen {PH0006/3}. This, I think,
 19 is a different view. Just to orientate ourselves, is
 20 Fishmongers' Hall towards the bottom middle, slightly to
 21 the left , near where we see the yellow and blue tent?
 22 A. That's right, yes, then as you look further along that
 23 becomes King William Street and then you can see
 24 House of Fraser at the end of that long road with Cannon
 25 Street running across.

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1 Q. That junction where we see House of Fraser, the Monument
 2 tube junction, will become significant when we get to
 3 the emergency response because it was, I think,
 4 a rendezvous place.
 5 A. That's correct.
 6 Q. May we take that off screen now.
 7 May we now turn to the order of events in the attack
 8 and also the interior of Fishmongers' Hall. You have
 9 told us that Usman Khan lived in Stafford; the event was
 10 in London. When and how did he travel there?
 11 A. So he travelled by train on that day, in the morning of
 12 the 29th, caught a train at around 7.30 in the morning,
 13 and then arrived at London Euston station on his own
 14 where he was met by one of the staff from
 15 Learning Together and one of the other alumni at the
 16 station.
 17 Q. Did those three then travel first by tube and then by
 18 foot to Fishmongers' Hall?
 19 A. That's right, yes. They took the tube down to Bank
 20 station or Bank/Monument station, and then walked to the
 21 hall.
 22 Q. If you can put on the screen, please {DC6603/13} and
 23 look at the image in the lower part of the page. Can we
 24 see there an image from a CCTV camera directly outside
 25 the front door of Fishmongers' Hall showing Usman Khan

1 in the bottom left of the image and the other two men,
 2 Simon Larmour and John Crilly, arriving at 9.58 in the
 3 morning on the day of the attack?
 4 A. That's correct, so you will note that Khan is wearing
 5 the blue padded jacket and Mr Larmour is wearing the
 6 woolly hat at the front. John Crilly at the top in the
 7 sort of beige-green jacket.
 8 Q. Turning now to the building they were entering, may we
 9 look at a series of photographs that show us a little of
 10 that building. {PH0050/1}, please. We see here,
 11 I think, the steps up to the main entrance and the
 12 entrance door.
 13 A. Yes, that's the very same steps we've just seen in the
 14 CCTV still.
 15 Q. And page 6, please. {PH0050/6}.
 16 A. So this is the main entrance hall. The door that's open
 17 to the right would lead down to those steps.
 18 Q. So on entering you would come through the door we see
 19 open over on the right of the picture?
 20 A. Yes.
 21 Q. And this is the main entrance foyer. We can see
 22 a registration desk used by the Learning Together event
 23 covered with blue cloth?
 24 A. Yes.
 25 Q. Then {PH0050/5}, please. Have we now effectively

1 rotated our gaze slightly to the left, further into the
 2 building?
 3 A. That's right, yes, and those doors lead into a corridor
 4 which then leads on to the stairs, which I think we'll
 5 see shortly.
 6 Q. So if you are coming into the entrance hall, you can go
 7 through the doors on the left or right of the statue,
 8 and that takes you into an area near the base of a large
 9 staircase?
 10 A. Yes.
 11 Q. Then {PH0050/65}, please. Is this the corridor you
 12 intermediately after you have come through one of those
 13 sets of doors leading further into the building?
 14 A. That's right, yes. And just to the right, behind those
 15 pillars, is the grand staircase which you can just see
 16 towards the top as it moves back on itself.
 17 Q. Page 152, please. We can see here, I think, the view
 18 from the other side {PH0050/152}, the large grand
 19 staircase leading from that corridor up to the next
 20 floor of the building?
 21 A. That's right, yes.
 22 Q. Following the staircase up, {PH0050/162}, please. That
 23 is, I think, the first landing of the staircase.
 24 A. Yes, that's right.
 25 Q. Then {PH0050/163}. I think we can see here the landing

1 at the top looking down over that staircase.
 2 A. That's right, yes, and that leads to three significant
 3 rooms: the Banqueting Hall, the Court Drawing Room and
 4 the Court Dining Room. The Dining Room straight ahead,
 5 the Banqueting Hall to the left, and then sort of at an
 6 angle to the left would be the Court Drawing Room.
 7 Q. May we look at each of those rooms because they are each
 8 going to feature in the evidence. Page 200, please
 9 {PH0050/200}. Can we see here the Banqueting Hall laid
 10 out as the main function room for the Learning Together
 11 event?
 12 A. That's right, yes. And the doors just to the left there
 13 would lead straight out on to that balcony that we saw
 14 in the previous picture.
 15 Q. {PH0050/203}, please. Now, I think, looking at
 16 an aerial view of that same room with the tables laid
 17 out for the attendees of that event.
 18 A. That's right, yes, and the stairs would be through the
 19 door to the right-hand side.
 20 Q. Turning to the order of events that day, did the order
 21 of events begin with a brunch served in the Court Dining
 22 Room, a couple of rooms away from this Banqueting Hall,
 23 from 11 o'clock that morning?
 24 A. Yes, that's right.
 25 Q. If we can look at your report {DC6603/6}, we can see

1 an image in the bottom part, please, which I think shows
 2 the brunch taking place between 11.00 and noon. I think
 3 we can see Saskia as one of the people marked in the
 4 photograph?
 5 A. Yes, that's Saskia on the right, and one of the other
 6 injured parties, Steph Szczotko on the left with the
 7 white blouse on.
 8 Q. And then page 14, please {DC6603/14}. Can we see the
 9 same room with Usman Khan pictured in his puffer jacket
 10 having brunch there with various other attendees in the
 11 room?
 12 A. That's right, yes, he is having his brunch there, and
 13 his bag is just to the left by — if you just follow his
 14 feet to the left, that's the bag that he was wearing,
 15 just down by the side of the table.
 16 Q. That image, we can see, was at 11.08 in the morning.
 17 A. Yes.
 18 Q. What time did the main sessions of the Learning Together
 19 event begin?
 20 A. Around about 12 o'clock they started with speeches in
 21 the main Banqueting Hall.
 22 Q. May we have page 7 of your report, so the same file,
 23 page 7, and look at the upper image. Can we see here
 24 an image taken just before noon showing people gathering
 25 for that opening session {DC6603/7}.

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1 A. That's correct, yes, and the image with the circle shows
 2 Saskia sat at the same table as Khan.
 3 Q. Then {DC6603/9}, please. We can see the room slightly
 4 fuller with a clearer image of Usman Khan and
 5 Saskia Jones both marked out on that table, waiting for
 6 the opening session to begin?
 7 A. Yes.
 8 Q. Did the opening session take place with some initial
 9 speeches from shortly after noon?
 10 A. Yes.
 11 Q. After those opening speeches, what happened in terms of
 12 the event?
 13 A. So the group split into two with one event taking place
 14 in the Banqueting Hall here, and the other in the Court
 15 Drawing Room. So if you can just see the door open to
 16 the centre, half of the attendees went through there.
 17 So Saskia and Jack were involved in that particular
 18 workshop in the Court Drawing Room, and Khan remained in
 19 the Banqueting Hall. I think he moved tables from that
 20 particular table though.
 21 Q. Is this right: there were about 100 attendees in total
 22 and they divided equally between the Banqueting Hall and
 23 the Court Drawing Room?
 24 A. Yes. Yes.
 25 Q. If we move to {DC6603/7} of your report and look at the

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1 lower image, I think we can see people gathered in the
 2 Court Drawing Room for the breakout session there, and
 3 once again, Saskia marked on that photograph?
 4 A. Yes.
 5 Q. We can take that off screen now.
 6 When did those two breakout sessions finish?
 7 A. Around about 1.30. They didn't finish at exactly the
 8 same time but more or less around about that time.
 9 Q. What then happened?
 10 A. So people took comfort breaks, some left the building to
 11 go for cigarettes and chatted whilst they waited for the
 12 second session to start.
 13 Q. Is it right that both Jack Merritt and Saskia Jones
 14 separately left the building for a short time during
 15 that break?
 16 A. That's right, yes.
 17 Q. Is it right that a further session, a feedback session,
 18 was due to begin at about 1.45 that afternoon?
 19 A. Yes.
 20 Q. During this break, where did Usman Khan go?
 21 A. So we believe that Usman Khan went down to the toilets
 22 on what we know as the ground floor, next to the
 23 reception area.
 24 Q. If we can bring up your report again, {DC6603/8}, what
 25 can we see here?

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1 A. So this is Jack returning. Jack left the building at
 2 around 13.37, and then returned back into the building
 3 at 13.40. This is him coming back into the building
 4 having had, I think, a smoke.
 5 Q. Then if we can look at the next image on that page, the
 6 image immediately below on that page. We can see here
 7 a photograph with Jack on the extreme right,
 8 a photograph taken in the vestibule area outside the
 9 function rooms upstairs. What time was this photograph
 10 taken?
 11 A. This was 13.52, so he has come into the building, gone
 12 upstairs, and this photograph was actually taken on his
 13 own phone. He gave his phone to a gentleman called
 14 David Ormerod, and asked him to take a photograph of
 15 himself, Ruth Armstrong, Steve Gallant and
 16 Simon Larmour, who were all members of the
 17 Learning Together organisation.
 18 Q. So that's 1.52 pm.
 19 A. Yes.
 20 Q. Then the next page, please {DC6603/9}. What does this
 21 photograph show and when was it taken?
 22 A. So this is taken at 13.53 so this is just a minute
 23 later, and the person that took the photograph,
 24 David Ormerod, is just to his right, and this was the
 25 last photograph that was taken before the attack, of

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1 Jack.
 2 Q. This is 1.53. We can take that off screen. Where did
 3 Jack go shortly after that photograph had been taken?
 4 A. He told David Ormerod that he was going to go to the
 5 toilet so we assume he went downstairs into the same
 6 gents toilets that Usman Khan was in.
 7 Q. Then we go to a plan at {DC6603/3} of your report.
 8 I think we can see a plan here of the floor that's
 9 accessed at ground level, so although it's described as
 10 the second floor --
 11 A. Yes.
 12 Q. -- it's the main entrance floor.
 13 A. That's right.
 14 Q. We can see the grand staircase in the middle towards the
 15 upper part of the plan. That's the staircase Jack would
 16 have come down?
 17 A. Yes.
 18 Q. Then we can see marked out in a red rectangle just to
 19 the right of that, the area of the cloakroom, lobby, and
 20 gents toilets where he would have been heading?
 21 A. Yes.
 22 Q. Then, please, {PH0050/72}. Can we see here the entrance
 23 to the gents toilets with the cloakroom desk over to the
 24 left of the shot, and three steps up to the gents
 25 toilets?

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1 A. That's right, yes.
 2 MR HOUGH: We're now moving on to the events of the attack,
 3 and I would just like to give a warning that I am about
 4 to show some photographs which show blood on the floor.
 5 I'll attempt to give such a warning, sir, whenever
 6 showing anything that might cause distress.
 7 JUDGE LUCRAFT: Thank you very much, Mr Hough. I think
 8 that's a very sensible warning to give us, as it were,
 9 when you are coming to those parts, just in case anyone
 10 wants to either absent themselves from the room.
 11 MR HOUGH: Page 75 next, please {PH0050/75}. Can we see
 12 here the urinals area of those toilets with two toilet
 13 cubicles at the far end?
 14 A. That's right, yes, and we found some items in the
 15 left-hand cubicle.
 16 Q. We will move to that in a moment.
 17 When Jack Merritt entered these toilets, so shortly
 18 after 13.53, what happened?
 19 A. So only Khan and Jack were inside this area at this
 20 time, however, from the blood pattern analysis, we're
 21 able to assess that Jack was attacked at this location
 22 by Khan leaving that left-hand cubicle.
 23 Q. What did Khan attack him with?
 24 A. Two knives. He had a knife in both hands, which he had
 25 taped to the gloves that he was wearing.

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1 Q. Now, you were about to tell us of preparations which
 2 Khan had made. Where had he made those final
 3 preparations and what were they?
 4 A. So, as I said, in the left-hand cubicle we found
 5 a number of items, including the bag I mentioned
 6 previously, as well as some tape and scissors and one
 7 other knife as well, so he had actually brought three
 8 knives to the venue. So he made his final preparations
 9 in that left-hand cubicle before then coming out and, we
 10 assume, encountered Jack, and at that point that's when
 11 Khan attacked Jack.
 12 Q. May we have on screen {PH0043/13}. Can we see here the
 13 cubicle with the black bag shown that Khan had with him
 14 from which he had obtained various equipment?
 15 A. That's right, yes.
 16 Q. Now, you told us that he armed himself with two knives.
 17 He had actually brought three knives to the event, the
 18 third being left in that bag?
 19 A. Yes.
 20 Q. May we look at images of the two knives that were used
 21 in the attack. First of all, {PH0001/1}. Is this one
 22 of the two knives actually used in the attack?
 23 A. Yes, that's right.
 24 Q. You told us that it was taped to his hands or wrists.
 25 Can we see the residue of the tape used just below the

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1 blade?
 2 A. That's right, yes. Yes.
 3 Q. Then {PH0014/1}. Do we see here the other knife used in
 4 the attack and remnants of the tape used to connect that
 5 to his hands or wrists?
 6 A. That's correct, yes. All the knives were identical.
 7 Q. May we now look at {PH0043/5}. Once again we are
 8 looking at the area of the urinals. We see a book which
 9 has been deposited on the floor. What was that book and
 10 what was its connection to the events?
 11 A. So it's a book entitled "Fortress of the Muslim", and it
 12 appears to be a generic prayer book for Muslim people.
 13 So we believe that that's dropped by Khan during the
 14 attack.
 15 Q. Next page, please {PH0043/6}. That's a close-up of the
 16 book?
 17 A. Yes.
 18 Q. We may hear more about this, but was it, or is it,
 19 a book of incantations?
 20 A. Yes, it's not an extremist book or anything like that;
 21 it's simply a general book of prayer.
 22 Q. We can take that off screen. You have told us that you
 23 established that Usman Khan had attacked Jack Merritt in
 24 the area of the urinals, and that there was no other
 25 witness directly to this attack. Did Usman Khan inflict

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1 a number of stab wounds on Jack in that area?
 2 A. He did, yes. I think Jack had 12 separate injuries,
 3 albeit some of them were rather more defensive injuries.
 4 The most serious injury was a wound to his chest.
 5 Q. Where did Usman Khan go from there?
 6 A. So he left the gents toilets and entered into the area
 7 of the cloakroom.
 8 Q. May we have an image of that, {PH0050/67}. Can we see
 9 here the entrance to the gentlemen's toilets we were
 10 just looking at and the cloakroom desk where people
 11 could check their coats?
 12 A. That's right, yes.
 13 Q. What happened next in the sequence of events?
 14 A. So at this point, from witness testimony, we believe
 15 that there were two members of staff in that area. So
 16 the cloakroom shutter was down and there was a member of
 17 staff behind the cloakroom. There was another member of
 18 staff just to the right, outside the doors to the gents
 19 toilets, and then Saskia Jones had just arrived to put
 20 her coat into the cloakroom.
 21 Q. Saskia had been outside, as you have described. She had
 22 come back in to leave her coat in the cloakroom?
 23 A. Yes.
 24 Q. And she was at the desk we are looking at?
 25 A. Yes.

1 Q. After he had come out of the gentlemen's toilets armed
 2 with his two knives, what did Khan do?
 3 A. He initially made a gesture towards the lady, the member
 4 of staff, as if to be quiet, and then he approached
 5 Saskia.
 6 Q. What did he do?
 7 A. He stabbed her once to the neck.
 8 Q. In her injured condition, where did Saskia go?
 9 A. She managed to get out of the cloakroom area and
 10 staggered to the bottom of the stairs. She managed to
 11 get up about three to four steps before she collapsed.
 12 Q. I think you depict the area where she collapsed in your
 13 report. May we have on screen {DC6603/11}. Do we see
 14 in the image there that you have identified with a red
 15 circle the area where Saskia collapsed?
 16 A. That's right, yes.
 17 Q. At the same time, Jack Merritt had been injured, he was
 18 in the toilets and still moving; where did he go?
 19 A. He came out of the toilets after Khan but he managed to
 20 make his way into the main reception area and then into
 21 that small office that we saw in an earlier photograph.
 22 Q. At this point, as he moved towards the main entrance
 23 area, do we have any CCTV images which help us to time
 24 events?
 25 A. Yes. There is one CCTV image of Jack where he appears

1 to have bloodstained clothing up against the window. So
 2 it's the exterior camera that we have seen previously,
 3 just for a moment we can see Jack, and that was at
 4 13.57.58.
 5 Q. I'm going to show this image. It is indistinct, but it
 6 is graphic and potentially distressing. {DC7421/29}.
 7 Lower image, please. So we can see there circled in
 8 green Jack in an injured state at the front door.
 9 A. You can just make out the bloodstaining on his white
 10 shirt.
 11 Q. We can take that off screen now.
 12 So that was 13.57, in fact just before 13.58; is
 13 that right?
 14 A. Yes.
 15 Q. Since he had moved straight to this area, on the
 16 evidence, is it fair, then, to estimate that the attack
 17 will have begun some time between 13.56 and 13.57?
 18 A. Yes, I would say so, yes.
 19 Q. You have told us that Jack was helped into a reception
 20 office, just off that main entrance hall. If we bring
 21 up on screen {PH0050/6}, we saw this image before. The
 22 front door to Fishmongers' Hall we see open on the
 23 right. Do we then see the reception office immediately
 24 ahead, partly obscured by that door, under the large
 25 green ornamental crest?

1 A. That's correct, yes.
 2 Q. And then {PH0050/10} of the same file, please, are we
 3 now looking from that office towards the door into the
 4 main entrance foyer?
 5 A. Yes.
 6 Q. {PH0050/11}, we're now looking round further into the
 7 office?
 8 A. That's right. It's a very small office.
 9 Q. Is it in that office where Jack Merritt first received
 10 first aid from staff members, members of the public, and
 11 later from police officers?
 12 A. That's correct, yes. So initially there was one member
 13 of staff in there and Simon Larmour who shut the door to
 14 protect him from Khan.
 15 Q. We can take that off screen.
 16 Now looking at page 16 of your report, if it helps,
 17 what were Usman Khan's movements after he had attacked
 18 Saskia?
 19 A. So we believe initially he moved to the bottom of the
 20 stairs, and at that point he encountered another
 21 individual, Stephanie Szczotko, who he stabbed once to
 22 the arm.
 23 Q. Stephanie survived her injuries?
 24 A. That's right, yes. She had quite a severe injury to her
 25 arm that went through, but yes, she survived.

1 Q. Where did he go after that attack?
 2 A. We believe he then moved back into the main reception
 3 area where he approached another young woman,
 4 Izzy Rowbotham.
 5 Q. May we have on screen {PH0050/5}. Now, we're looking
 6 again at this image of the main entrance foyer. As we
 7 know, the two doors on the left lead towards the
 8 staircase and, in particular, the door on the far left
 9 heads directly towards the staircase?
 10 A. That's right, yes. Yes.
 11 Q. So is it right that Usman Khan came from that direction
 12 after stabbing Stephanie Szczotko, into this area to
 13 continue his attack?
 14 A. Yes, Izzy Rowbotham was in and around the desk and, in
 15 fact, she was stabbed and fell just to the right of
 16 where this image was taken.
 17 Q. Izzy, who was another member of staff for
 18 Learning Together, survived her injuries?
 19 A. She did, yes.
 20 Q. Over the next couple of minutes, was Usman Khan
 21 confronted by a number of those who had attended the
 22 event?
 23 A. That's right, yes, there were a number of individuals
 24 who managed to take various items from the walls and use
 25 as weapons to defend themselves and others.

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1 Q. They were also, I think, assisted by a porter from The
 2 Fishmongers' Company, Lukasz Koczocik?
 3 A. Correct, yes. He had been downstairs and came up having
 4 heard the commotion and joined in trying to subdue Khan.
 5 Q. Among the items used to hold him back was one, an
 6 ornamental pike which had been taken from the wall where
 7 we see the empty bracket is to the left of the statue?
 8 A. That's correct, yes, yes.
 9 Q. We can see what that looks like, {PH0023/4}. That's
 10 an image of that metal-headed boarding pike.
 11 A. Yes.
 12 Q. And was another of the items used to hold him back
 13 a narwhal tusk?
 14 A. Yes, originally there had been two narwhal tusks
 15 upstairs and one of the individuals had gone upstairs
 16 and recovered those, in fact both of those, on two
 17 separate occasions, to use as weapons to defend himself
 18 and others using that narwhal tusk.
 19 Q. May we look now at {DC8000/96}. Do we see here the
 20 broken main part of one of the narwhal tusks used in the
 21 confrontations with Khan?
 22 A. Yes, that's right, yes. They were broken in the attack.
 23 Q. We can take that off screen now.
 24 During this period while he was being held at bay by
 25 various people, did Usman Khan manage to inflict further

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1 injuries on people?
 2 A. Yes, he returned. One witness stated that he had
 3 returned to Izzy Rowbotham and stabbed her again as she
 4 was laying prone on the ground.
 5 Q. I think he was also able to injure Lukasz, the
 6 Fishmongers' Hall porter, in their confrontation?
 7 A. That's right, yes. He received stab wounds to the arm
 8 as well.
 9 Q. How did this confrontation in the entrance foyer come to
 10 an end?
 11 A. So he approached a member of staff who was actually the
 12 door security, because the door was locked, and held
 13 a knife to his chest, this member of staff, and asked
 14 him to open the door, which he did.
 15 Q. While Usman Khan had been continuing his attack in the
 16 main entrance area, and while Jack Merritt was being
 17 assisted in the reception office, what was happening
 18 upstairs with all the people gathered in those function
 19 rooms?
 20 A. So there was obviously a commotion because people heard
 21 screams, lots of confusion, so a couple of people came
 22 downstairs and then subsequently a number of people then
 23 left via another exit once things had sort of happened.
 24 Q. If we now bring up on screen {DC6603/16}, the lower
 25 image on that page of your report. Can we now see,

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1 again from the CCTV camera above the door entrance to
 2 Fishmongers' Hall, Usman Khan coming out of the building
 3 after he had forced that member of staff to open the
 4 door for him?
 5 A. That's correct, yes. You can't see it, but he's got
 6 knives in both hands.
 7 Q. We can see the knife in his right hand, but the one in
 8 the left is just out of the shot.
 9 A. That's correct.
 10 Q. And then page 8 of your — sorry {PH0002/8}, we're now
 11 looking back at that aerial view in which we can see the
 12 entrance door to Fishmongers' Hall just next to the blue
 13 and yellow tent. Where did Usman Khan go after leaving
 14 the doorway?
 15 A. So initially, having left, the door was shut behind him,
 16 he turned and tried to get back in, but, unsuccessful,
 17 he then turned again, went down the steps and turned
 18 right towards London Bridge.
 19 Q. Just to be clear, the reason he couldn't get back in,
 20 I think, is the doors have an automatic lock.
 21 A. Yes.
 22 Q. And need to be released by a button just to the side of
 23 the door inside?
 24 A. That's correct, yes.
 25 Q. You have told us when he couldn't get back in, he then

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1 headed down onto the pavement and towards London Bridge.
 2 Did any others leave the hall over these next minutes?
 3 A. Yes, so John Crilly, Steve Gallant and Darryn Frost all
 4 left after him, all had armed themselves with various
 5 items such as the narwhal tusk and a fire extinguisher.
 6 Q. I think Mr Crilly had the fire extinguisher and Mr Frost
 7 had the narwhal tusk.
 8 A. That's right, yes.
 9 Q. Did they catch up with Usman Khan?
 10 A. Yes. So you can see the vehicle mitigation barriers
 11 just along before the tent, so just after that area,
 12 Khan started to run towards various members of the
 13 public that were on the bridge, and at that point the
 14 three individuals caught him and began to try and subdue
 15 him.
 16 Q. So Khan came down those steps and then went along the
 17 pavement towards the left in our photograph. You told
 18 us that he passed the barriers, the hostile vehicle
 19 mitigation barriers, which look like three ovals on the
 20 pavement?
 21 A. That's right, yes.
 22 Q. It was some distance after that that he was caught up
 23 with by those three following him?
 24 A. Yes, where the tent is on the left—hand side.
 25 Q. May we next have on screen {DC7421/32}. Are we now

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1 seeing a CCTV image from a City of London camera mounted
 2 on a lamppost looking towards that area where the
 3 confrontation took place?
 4 A. Yes, and you can see at the bottom those sort of
 5 barriers that I talked about.
 6 Q. What time did these events take place?
 7 A. So this was around about 14.00 hours, I believe. 14.01.
 8 Q. So the attack had begun some time between 13.56 and
 9 13.57.
 10 A. Yes.
 11 Q. And we are now about four or five minutes later on the
 12 bridge after the events you've described?
 13 A. Yes.
 14 MR HOUGH: Sir, I don't know if that would be a convenient
 15 moment? I see it's just after 1.00 pm.
 16 JUDGE LUCRAFT: We will break there, Mr Hough. I think we
 17 will come back to these events when we resume.
 18 I am going to say to the jury we will aim to resume
 19 with the jury at 2.10 pm. Mr Hough, there are just
 20 a couple of things we need to deal with at 2 o'clock
 21 which don't trouble the jury. So we will break there,
 22 ladies and gentlemen, and sit again with you, please, at
 23 2.10.
 24 Again, if you would follow the direction of my
 25 usher, I would be most grateful. Thank you.

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1 (1.04 pm)
 2 (The short adjournment)
 3 (2.03 pm)
 4 (In the absence of the jury)
 5 JUDGE LUCRAFT: Good afternoon, everyone. I'm going to just
 6 take a couple of minutes to allow for some photographs
 7 to be taken of the room we are using for these hearings.
 8 Anyone who doesn't wish to be caught on an image, now is
 9 your time to leave. I'm suggesting we do it now before
 10 we have any witnesses or jurors in their seats, and
 11 really it's just an opportunity, because I should
 12 imagine members of the press would like to be able to
 13 show an image of the facility we're using for these
 14 Inquest hearings, but we won't be showing anything on
 15 a screen connected with the evidence.
 16 (2.12 pm)
 17 (In the presence of the jury)
 18 JUDGE LUCRAFT: Thank you. Welcome back, everyone.
 19 MR HOUGH: DCI Brown, just before we broke off before lunch,
 20 you had been telling us about the confrontation on the
 21 bridge and we had looked at an image of Mr Crilly,
 22 Mr Gallant and Mr Frost subduing Usman Khan.
 23 Did members of the public also join in the efforts
 24 to pin him down and remove the knives?
 25 A. That's correct, yes. Several people who were in

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1 vehicles and walking across the bridge at the time also
 2 joined in.
 3 Q. And we can look at an image {DC6603/17}, page 17 of your
 4 report, the lower image on that page, please. Are we
 5 now seeing an image as Usman Khan has been brought to
 6 the floor by the three men from the hall and members of
 7 the public?
 8 A. Yes, that's right.
 9 Q. Shortly after the events shown on this image, did police
 10 start to arrive?
 11 A. Yes, they did. I should have mentioned that the first
 12 call made to police was at 13.58.58 and then police
 13 arrived on scene, the first police arrived on scene from
 14 City of London Police at 14.02.
 15 Q. If we put on the screen {DC7421/33}, and if we focus on
 16 the image on that page, I think we can see an image
 17 shortly after the police have arrived and we can see
 18 that the first police on that scene were armed police?
 19 A. That's correct, from the City of London Police.
 20 Q. After they had arrived at 14.02, what did the officers
 21 do first?
 22 A. As they approached, it was at this point that they
 23 identified that Khan was actually wearing what appeared
 24 to be a person—borne IED, or improvised explosive
 25 device, so they encouraged members of the public to move

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1 away.
 2 Q. Did they first of all clear away the people who were
 3 immediately holding him down and then see what, as you
 4 have said, appeared to be a suicide belt?
 5 A. Yes.
 6 Q. If we look at {DC6603/18}, and if we look at the bottom
 7 image on the page, what are we looking at there?
 8 A. So that's what I referred to as what appears to be
 9 an IED, a person-borne IED, that was actually strapped
 10 around his midriff.
 11 Q. You are pointing out the lower part of his torso.
 12 A. Yes.
 13 Q. The device obviously, as we see there, has been cut off
 14 by explosives officers?
 15 A. That's right, yes. But that was strapped to him.
 16 Q. Shortly after they cleared members of the public out of
 17 the way, what followed between the officers and
 18 Usman Khan?
 19 A. So there was one individual, Mr Frost, who was still
 20 holding on to Khan. He was told to move out the way and
 21 pulled to one side, and at that point one of the
 22 officers discharged their firearm and another discharged
 23 a taser.
 24 Q. So one shot at Usman Khan and the other fired a taser?
 25 A. Yes.

1 Q. Did their shots connect?
 2 A. Yes.
 3 Q. At this point was Usman Khan injured but alive?
 4 A. That's correct, yes. He was still very much alive.
 5 Q. We can take this image off screen.
 6 What did he do and what did the various officers do
 7 in the moments that followed?
 8 A. So in light of the fact that he was wearing the IED, the
 9 officers withdrew. Khan remained on the floor but was
 10 still moving about.
 11 Q. By this point, had a number of other officers arrived on
 12 the scene who were covering Khan from a distance?
 13 A. That's correct, yes, both the City of London and
 14 Metropolitan Police officers.
 15 Q. Over the minutes that followed, was there an uneasy
 16 stand off, effectively?
 17 A. Yes, because Khan sat up at one point, was moving
 18 around, and clearly presented what -- the officers will
 19 give their own evidence, but presented the threat from
 20 the IED.
 21 Q. Was further action taken against him over those minutes?
 22 A. Further shots were then taken, yes -- sorry, further
 23 firearms were discharged, police firearms were
 24 discharged at him.
 25 Q. At what time did that take place?

1 A. Further shots were fired at 14.10, and it was at 14.12
 2 when he no longer showed any signs of life.
 3 Q. So just to remind ourselves of the sequence, 13.56 to
 4 13.57 the attack begins.
 5 A. Yes.
 6 Q. At 14.01 Khan is pinned down.
 7 A. Yes.
 8 Q. At 14.02, the first police officers arrive on scene.
 9 A. Yes.
 10 Q. They discharge a firearm and a taser shortly after that?
 11 A. Yes. Still at 14.02.
 12 Q. Then there's a period of minutes during which no
 13 firearms are discharged and Khan is being covered?
 14 A. Yes.
 15 Q. And then during which time Khan is exhibiting some
 16 movements?
 17 A. Yes.
 18 Q. And then at 14.10, something happens and the officers
 19 will tell us what.
 20 A. Yes.
 21 Q. Something happens to cause the officers, a number of
 22 officers, to fire again at Usman Khan?
 23 A. Yes.
 24 Q. What happened to him as a result of those shots in the
 25 second round, as it were, being fired?

1 A. It appeared to neutralise the threat that was posed by
 2 him and he appeared to be deceased at that stage.
 3 Q. No further movements from him from that point on?
 4 A. That's correct.
 5 Q. Were explosives officers sent for and arrived in order
 6 to inspect the device?
 7 A. That's correct, yes. I think they used two explosive
 8 dogs first and then an officer went forward and examined
 9 the device.
 10 Q. If we can look at {DC7421/62}, if we just focus on the
 11 lower image on the page, are we now seeing a point in
 12 time with the explosives officers beginning to move
 13 towards Khan at 14.41, so 19 minutes to 3.00?
 14 A. That's correct, that's actually two armed officers
 15 accompanying the one explosives officer.
 16 Q. What did the explosives officers conclude when they went
 17 forward and looked at the device?
 18 A. So on closer examination they were able to conclude that
 19 it was a non-viable -- not a real, not a genuine IED.
 20 Q. So it was a hoax suicide belt?
 21 A. Hoax, yes.
 22 Q. Shortly after that had been discovered, was it then
 23 possible to examine Usman Khan medically?
 24 A. Yes.
 25 Q. What was the result of that?

1 A. His life was pronounced extinct at 15.07.
 2 Q. That was the formal time of declaration of death,
 3 although of course very likely deceased earlier?
 4 A. Yes.
 5 Q. Can we turn, then, to the medical care and the death of
 6 Jack Merritt and Saskia Jones, and we can take that
 7 image off screen now. I'm looking at page 12 of your
 8 report, if it helps. You have told us how Jack Merritt
 9 made his way into the reception office and received some
 10 assistance there, first from civilians and then from
 11 armed police -- I'm sorry, then from police.
 12 A. Yes.
 13 Q. Did a point in time come when London Ambulance Service
 14 medics arrived?
 15 A. Yes.
 16 Q. What was their advice?
 17 A. Their advice was to remove Jack so that he could be
 18 treated in a safe location.
 19 Q. Was he then removed from the building on a drag sheet?
 20 A. He was, he was taken on a kind of stretcher, removed
 21 from the building and then brought down to where Cannon
 22 Street meets King William Street.
 23 Q. So we looked on one of those pictures earlier at the
 24 Monument junction between Cheapside, King William
 25 Street, Cannon Street -- or Eastcheap, King William

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1 Street, and Cannon Street. That was where, as you told
 2 us, the rendezvous point was?
 3 A. Yes.
 4 Q. That was where Jack was taken for further medical care.
 5 A. Yes.
 6 Q. And is this right: that he was removed from the building
 7 for that purpose at 14.23?
 8 A. 14.23.31, yes.
 9 Q. When he reached the rendezvous point, what care was
 10 given to him and by whom?
 11 A. He was treated by doctors from the Helicopter Emergency
 12 Medical Service, which is HEMS, they quickly tried to
 13 save his life, but unfortunately he could not be saved
 14 and he was pronounced dead at 14.33.
 15 Q. Was a post mortem examination later carried out, which
 16 we'll hear about in further detail later in the hearing?
 17 A. That's right, it was, yes.
 18 Q. What did that examination establish?
 19 A. It identified that he had suffered multiple knife
 20 wounds. Some of those were defensive movements from
 21 Jack. The principal and fatal wound was to the chest.
 22 Q. Moving on to Saskia, you have told us that Saskia
 23 collapsed on the lower staircase in Fishmongers' Hall
 24 and received assistance from people who were attending
 25 the event.

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1 A. Yes.
 2 Q. Did police officers also arrive to assist her after
 3 a short time?
 4 A. That's right, yes. So Saskia was removed to the foot of
 5 the stairs to allow medical treatment to take place, as
 6 you said, from some of the attendees at the event, and
 7 then some officers of the City of London Police, and
 8 then subsequently the London Ambulance Service attended.
 9 Q. How did her condition develop?
 10 A. It deteriorated very, very quickly, to the point where
 11 she was given CPR by the officers and the attendees.
 12 Q. She was given CPR in situ at the bottom of the stairs?
 13 A. Yes.
 14 Q. Were efforts made to save her over the time that
 15 followed?
 16 A. They were, significant efforts, yes.
 17 Q. What was the effect of those efforts?
 18 A. Unfortunately and tragically, they were unable to save
 19 her life, and she was pronounced dead at 14.25.
 20 Q. Was that decision to end CPR and pronounce her dead made
 21 with the assistance of clinicians or medics on the
 22 scene?
 23 A. Yes, paramedics at the scene.
 24 Q. What was the result, in very brief terms, of the post
 25 mortem examination on Saskia?

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1 A. That she died of a single stab wound to the right-hand
 2 side of her neck, which had caused a catastrophic
 3 haemorrhage.
 4 Q. So very severe blood loss?
 5 A. Yes.
 6 Q. May we then move to the investigations you and your team
 7 carried out after the attack. We have looked at the
 8 knives used in the attack. Were you able to secure
 9 those soon after the attack at the scene?
 10 A. That's right. The two knives that were used in the
 11 actual attack were recovered and then subsequently
 12 a third knife found from within a cubicle.
 13 Q. What kind of knives were they? I appreciate we've seen
 14 pictures, but what kind and of what length?
 15 A. They were all 8-inch kitchen knives.
 16 Q. May we look back at one of them just to identify one
 17 point. {DC6603/21}. Now, looking more closely at the
 18 blades of the knives, we can see that something has been
 19 scratched on the blade just close to the handle. What's
 20 that image?
 21 A. So our assessment of that is it's a very crude effort to
 22 inscribe a symbol in Arabic that means "Allah" or "God".
 23 Q. So the Arabic symbol for the name of God?
 24 A. Yes.
 25 Q. We can take that off the screen now.

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1 Was a fourth similar knife discovered at
 2 Usman Khan's home address in Stafford?
 3 A. It was, exactly the same, yes.
 4 Q. Did your team and scientists proceed to have DNA
 5 investigations carried out on these two knives that were
 6 involved in the attack?
 7 A. Yes, we did. Yes.
 8 Q. What were the results of those? I think you set them
 9 out at paragraph 4.4 of your report?
 10 A. Yes. So the first knife, DNA profiles were found for
 11 Saskia, Izzy Rowbotham and Lukasz Koczocik.
 12 Then the second knife, DNA profiles were found again
 13 for Jack, John Crilly, and Lukasz Koczocik.
 14 Q. May we now look back at the suicide vest used in the
 15 attack, {DC6603/23}, the hoax suicide vest. Did your
 16 team, assisted by forensic scientists, examine this to
 17 work out how it had been put together?
 18 A. We did, yes. We took each individual item apart from
 19 the device.
 20 Q. In brief summary, what were the main components used in
 21 creating this device?
 22 A. So the black cloth is effectively -- it's like
 23 a slimming belt that would be worn around someone's
 24 stomach, and then some of the electronic parts are from
 25 a battery charger and an Xbox, components from a Xbox,

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1 all of which we found back at Khan's address.
 2 There are -- also what appear to be the main charge
 3 is actually bandages wrapped up in cling film to give
 4 the appearance, as I say, of explosives.
 5 He has also utilised some Gorilla Glue to actually
 6 stick what appear to be the charges on to the device,
 7 and then 2-inch tape wrapped around.
 8 Q. I think you told us a moment ago that the components or
 9 remnants of the components were found in Usman Khan's
 10 flat in Stafford?
 11 A. Yes. All the components were found within the flat or
 12 in the bins outside.
 13 Q. So suggesting that it had been put together in that
 14 flat?
 15 A. Yes, we believe it was.
 16 Q. When do you consider that Usman Khan had put this device
 17 on himself during the course of the day?
 18 A. So my strongest hypothesis is that he put the device on
 19 when he was on the train travelling to London.
 20 Q. In a sentence or two, why have you come to that view?
 21 A. For three reasons, really: first of all, the grey tape
 22 that you can see wrapped around would have had to have
 23 been wrapped around at the time when he was putting the
 24 belt on, so therefore that would have left an empty roll
 25 or a partially empty roll. We found no such roll in the

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1 toilets and no such roll at the home address, so we can
 2 assume that that was put on at some stage during the
 3 journey.
 4 We know that he made three visits to toilets during
 5 the journey, once at Stafford station, once on the train
 6 itself, and then once at Euston station, but by far the
 7 longest was on the train where he spend seven minutes in
 8 the toilet cubicle.
 9 The other aspects are in relation to the coat that
 10 he was wearing at the time, which we know he had
 11 purchased the day before the attack, and that was bought
 12 a size larger than we know the normal size he used to
 13 wear, and we also know that he had recently bought
 14 another new coat as well, so we believe that the coat
 15 was worn to cover up the device.
 16 It's notable that in the pictures throughout the
 17 course of the day that he hardly took the coat off, in
 18 fact I think he took it off once where he wrapped it
 19 around his waist so we believe that was to hide the
 20 device on his body.
 21 Q. We will see later, I think, some images both of the coat
 22 on and the one time he had it around his waist?
 23 A. Yes, that's right.
 24 Q. In your investigations, have your team also seized and
 25 examined a series of digital devices of many people

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1 known to have been in contact with Usman Khan, including
 2 members of his family?
 3 A. Yes, we have numerous devices.
 4 Q. Have you also carried out extensive and numerous
 5 interviews with witnesses?
 6 A. Yes, numerous.
 7 Q. Have you seized large amounts of CCTV footage, both from
 8 the day of the attack and from around Usman Khan's home
 9 in the preceding period?
 10 A. Yes.
 11 Q. Have you also been able to track Usman Khan's movements
 12 to an extent using both his mobile phone data and the
 13 GPS tag he wore as a prisoner on licence?
 14 A. That's right, yes, and that's been able to give us
 15 a good picture of his movements on the day and leading
 16 up to the day.
 17 Q. Now, from all those investigations, have you discovered
 18 any evidence that anybody else other than Usman Khan was
 19 involved in the planning, preparation or execution of
 20 this attack?
 21 A. No, none. No, we're satisfied that he acted completely
 22 alone in this attack.
 23 Q. Have you discovered that anyone else knew about the
 24 intended attack at Fishmongers' Hall?
 25 A. No, we've seen no evidence that anyone else had

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1 an awareness of what was going to take place.
 2 Q. Thank you. We can take that image off screen.
 3 I'm now going to move on to some of the visual aids,
 4 beginning with presentations by the Computer-Aided
 5 Modelling Bureau. That, I think, is a department of the
 6 Metropolitan Police Service.
 7 A. That's correct, yes.
 8 Q. In the aftermath of the attack, did the Bureau carry out
 9 a digital photographic survey of the scene around
 10 Fishmongers' Hall and within the building?
 11 A. Yes, this is while it was still a crime scene.
 12 Q. Did they use the fruits of that survey to prepare
 13 various schematics, including the plans we've seen, and
 14 various images of the building?
 15 A. That's right, yes, to try and give the jury the
 16 opportunity to see what it looked like inside.
 17 Q. Now, we're going to look at the first of these, which is
 18 a scene presentation, just over six minutes in length,
 19 which is {AV0008}. If we can bring that up and then
 20 pause it right at the start. So pause there, please.
 21 Just before we start this, you understand, I think,
 22 that we will pause at various points to see what we're
 23 looking at, and when we're looking at it, is it well to
 24 bear in mind that there is still some debris from the
 25 scene because, as you have told us, it was a crime scene

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1 at the time?
 2 A. That's correct, yes. It is obviously a digital image,
 3 not a photographic image, but there are things within
 4 there because it was a crime scene, as I say.
 5 Q. Although not, I think, anything particularly graphic or
 6 distressing?
 7 A. No.
 8 Q. May we play on, please, beginning at an aerial view.
 9 (Video played)
 10 Pause there, please. We're looking at the scene
 11 from an aerial view. We've got Fishmongers' Hall
 12 pointed out, and then running north/south, London Bridge
 13 up to King William Street to that junction with Cannon
 14 Street and Eastcheap where the rendezvous point was.
 15 A. Yes.
 16 Q. Play on, please.
 17 (Video played)
 18 Now descending, looking across London Bridge towards
 19 Fishmongers' Hall. Pause here, please. We can see the
 20 entrance to Fishmongers' Hall but also opposite it,
 21 a lamppost has been pointed out. What's being
 22 identified there, Mr Brown?
 23 A. That's the actual CCTV camera that some of our imagery
 24 will later on show.
 25 Q. So when we looked earlier on at some images of the

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1 confrontation on the bridge, were they taken from that
 2 camera?
 3 A. Yes.
 4 Q. I think as we play on we will see an example of such
 5 an image. Play on, please.
 6 (Video played)
 7 Now pause here. I think we are now in a position at
 8 the base of the steps going into Fishmongers' Hall.
 9 We're looking down the pavement towards London Bridge
 10 towards the position where the confrontation took place
 11 and Usman Khan was finally pinned down.
 12 A. Yes, where the tent is with the yellow top.
 13 Q. Play on. Now entering the building.
 14 (Video played)
 15 Now pause here. We're now, I think, in the entrance
 16 foyer looking at the registration desk covered with the
 17 blue cloth.
 18 A. Yes.
 19 Q. Straight ahead, slightly over to the right, the doorway
 20 with doors open leading through to the cloakroom.
 21 A. That's correct.
 22 Q. With, I think, the gentlemen's toilets where Usman Khan
 23 armed himself just around to the right beyond that?
 24 A. Yes, just up those three steps.
 25 Q. Then if we look to the doorway to the left of the

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1 statue, can we there see through to the main staircase?
 2 A. Yes, that's correct.
 3 Q. Is this right: some parts of the confrontation between
 4 Usman Khan and others shortly before he left involved
 5 him being in this area of the entrance foyer and those
 6 keeping him at bay being beyond the doorway close to the
 7 stairs?
 8 A. That's correct, yes, and you can see I think it's
 9 a chair that looks like it has been turned upside down
 10 that was used as one of those weapons to subdue him
 11 inside.
 12 Q. Then we can play on, please.
 13 (Video played)
 14 The registration desk marked where Isobel Rowbotham
 15 was attacked. The location of the boarding pike which
 16 was taken by Lukasz the porter. And we're moving
 17 through pointing out the cloakroom where Saskia was
 18 attacked.
 19 A. Yes.
 20 Q. We're moving down the corridor. Pause there, please.
 21 We can see the main staircase on the right.
 22 A. Yes.
 23 Q. On the left, further along, can we see, as the label
 24 tells us, where the fire extinguisher was taken which
 25 was used by John Crilly to spray Usman Khan?

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1 A. That's correct, yes, and it's worth pointing out those
 2 tables were not there at the time of the attack, the
 3 ones on the left. They were trestles put up as part of
 4 the crime scene investigation.
 5 Q. And we're now about to move to the bottom of the stairs
 6 identifying where Saskia fell and where Stephanie
 7 Szczotko was attacked, and the place at the bottom of
 8 the stairs where Saskia was given CPR. Play on, please.
 9 (Video played)
 10 The animation now ascending the main staircase,
 11 following the right branch up to the main landing
 12 outside the function rooms.
 13 A. Yes.
 14 Q. Pause here. The Learning Together label pointing to the
 15 left, where does that take us?
 16 A. That takes you into the Banqueting Hall, the large room
 17 with all the number of tables, round tables.
 18 Q. And the other arrow directs us to refreshments in the
 19 Court Dining Room; is that correct?
 20 A. Correct, yes. Yes.
 21 Q. So play on, please. We'll enter the Banqueting Hall.
 22 (Video played)
 23 The animation will pan around and mark out the
 24 lectern and the panel desk.
 25 A. Yes.

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1 Q. We now, I think, will see the tables marked out by
 2 number, 12 attendee tables?
 3 A. Yes, and we know that Khan had sat on both tables 3 and
 4 4.
 5 Q. We're now moving through to the Court Drawing Room?
 6 A. Yes, this is where the second workshop took place, where
 7 Jack and Saskia were involved.
 8 Q. Having gone through that room, are we now moving through
 9 to the Court Dining Room where the refreshments were
 10 served from 11.00 am?
 11 A. That's correct, yes.
 12 Q. Pause here, please.
 13 I think we have now moved in a clockwise circle
 14 through the rooms to a vestibule with a door at the end
 15 just to the right of the fireplace, leading back to the
 16 landing.
 17 A. Yes.
 18 Q. And I think in a moment we're going to see the viewpoint
 19 pan to the right, and another entrance to the Court
 20 Drawing Room, and some stands where the narwhal tusks
 21 were taken from.
 22 A. That's correct, yes, by Mr Frost.
 23 Q. Play on, please.
 24 Now we are moving through the main vestibule back to
 25 the landing before descending the stairs.

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1 A. Yes.
 2 Q. If we can pause there at the middle point of the stairs.
 3 We're now, I think, looking back towards the entrance
 4 foyer, the doors to our left. The left-hand set just to
 5 the left of the picture, and the right-hand set partly
 6 obscured by the two pillars.
 7 A. Yes.
 8 Q. And again, is it right that during the confrontation
 9 between various people attending the event and
 10 Usman Khan, some of them were around the base of the
 11 stairs that we see here while for periods Usman Khan was
 12 in and around the entrance foyer moving back and forth?
 13 A. That's right, yes.
 14 Q. Play on, please.
 15 (Video played)
 16 We're now, I think, moving around left into the
 17 cloakroom. Pause there. We see the attendant's desk
 18 marked, the area where Saskia was attacked?
 19 A. That's correct, yes. And as I mentioned before, that
 20 was closed at the time, that hatch was down.
 21 Q. Play on, please.
 22 (Video played)
 23 We see the way through to the gentlemen's toilets --
 24 A. Yes.
 25 Q. -- where Jack was attacked. Then I think we return

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1 through towards the entrance foyer, pointing out where
 2 Lukasz, the porter, was attacked in the doorway.
 3 A. Yes.
 4 Q. Pause there. We're seeing marked, I think, on the left
 5 the reception and security office where Jack was taken
 6 and received CPR.
 7 A. Yes.
 8 Q. And also just to the left of the door, the fire alarm
 9 and door release buttons. Was the door release button
 10 the one which was used to let Usman Khan out of the
 11 building with a fob?
 12 A. Yes, that's right.
 13 Q. Play on, please. We're going to be taken into the small
 14 reception office where Jack Merritt was given refuge and
 15 received medical care.
 16 A. Yes.
 17 Q. We're now going to move to a second animation, {AV0009},
 18 just over 4 minutes in length. Is it right that this
 19 animation shows the route taken by Usman Khan in the
 20 course of the attack?
 21 A. Correct.
 22 Q. Again, when we see this animation, will we see some
 23 debris and residue from the aftermath of the attack?
 24 A. Yes, again, it was taken during the course of being
 25 a crime scene.

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1 Q. Now, we're beginning in the gentlemen's toilets.
 2 (Video played)
 3 Marking the cubicle where Usman Khan left his bag.
 4 A. That's right.
 5 Q. Identifying the place where Jack Merritt was attacked.
 6 A. Correct.
 7 Q. And then we'll move out of the toilets into the
 8 cloakroom area, pointing out where Saskia was injured.
 9 A. Yes.
 10 Q. The animation shows us where Lukasz received injuries,
 11 but not at this point in the sequence, I think.
 12 A. That's correct, yes.
 13 Q. And the animation moves to near the foot of the main
 14 staircase, marking out where Usman Khan attacked
 15 Stephanie Szczotko.
 16 A. Yes.
 17 Q. And where further up Saskia Jones initially fell.
 18 A. Yes.
 19 Q. Pause, please.
 20 (Pause).
 21 Then play on, please.
 22 (Video played)
 23 The animation then shows how Usman Khan moved back
 24 into the entrance area.
 25 A. Yes.

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1 Q. That he confronted and attacked Lukasz at this point in
 2 the sequence?
 3 A. Yes, I think the door to the left is just where Lukasz
 4 had come from upstairs.
 5 Q. And then pointing out where Isobel Rowbotham was
 6 attacked near the registration desk?
 7 A. Yes.
 8 Q. We're now, I think, moving towards and through the main
 9 doors.
 10 A. That's correct.
 11 Q. Where Usman Khan left after he had forced the member of
 12 staff to open the doors.
 13 A. Yes.
 14 Q. Pause here.
 15 Is the animation now taking us on the route which
 16 Usman Khan took as he left, heading towards
 17 London Bridge pursued by Mr Crilly, Mr Gallant and
 18 Mr Frost?
 19 A. That's right, yes, through the security barriers.
 20 Q. And those black security barriers are up in front.
 21 Play on, please.
 22 (Video played)
 23 Pause there. The blue and yellow tent erected
 24 obviously to mark the area where Usman Khan was shot and
 25 killed.

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1 A. That's correct, that's right.
 2 Q. That was also, I think, the area where he was confronted
 3 by members of the public?
 4 A. Exactly. He fell to the ground there and then was shot
 5 whilst on the ground.
 6 Q. I think the image we can see is from that lamppost CCTV
 7 camera, this image showing Mr Crilly with the fire
 8 extinguisher, Mr Frost with the narwhal tusk, and
 9 Mr Gallant all dealing with Usman Khan?
 10 A. Yes, that's right.
 11 Q. Play on, please.
 12 (Video played)
 13 The animation is now going to move to an aerial
 14 view. If we pause there, can you tell us what we're
 15 looking at with the various alphanumeric ciphers that
 16 are appearing on the screen?
 17 A. Yes, these are the codenames of the officers who are
 18 anonymous in this process, and that represents the
 19 positions they took when trying to confront Khan after
 20 he had initially been shot.
 21 Q. If we move up the pavement from Khan towards the
 22 Fishmongers' Hall main hall entrance, we can see
 23 a number of armed officers, AZ99, TC52 and so on --
 24 A. Yes.
 25 Q. -- gathered in that area to provide cover on Khan.

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1 A. That's right.
 2 Q. And then if we look across the road from Khan to the
 3 right we can see four armed officers identified
 4 providing cover from across the road?
 5 A. Yes, that's right.
 6 Q. As you've told us, these are officers who have all been
 7 granted anonymity within this process by court order
 8 because of their requirements?
 9 A. That's right, yes.
 10 Q. And play on, please.
 11 (Video played)
 12 Now looking back over the scene shortly before
 13 ending the video.
 14 Thank you very much.
 15 May we now move to a different visual aid, which is
 16 a compilation of videos and images. Is it right that
 17 your team have put together a compilation of videos and
 18 still images in three main parts?
 19 A. Yes, that's right. We've got footage of Khan before the
 20 day of the attack, then Khan's journey from home to
 21 Fishmongers' Hall on that day, and then the events of
 22 the day.
 23 Q. And the third of those compilations covering the events
 24 of the day is the one we're going to look at now, and it
 25 is in four subsections.

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1 A. Yes.
 2 Q. The first we're going to look at is {AV0014}, if we can
 3 bring that up, it is 11 minutes long and shows events
 4 within Fishmongers' Hall before the attack took place.
 5 A. That's right.
 6 (Video played)
 7 Q. Now pause here. We're now looking at a still taken at
 8 10.46 in the morning, so shortly before the brunch
 9 session started, showing Jack Merritt at the front
 10 helping with the set up, and Usman Khan already sitting
 11 at one of the attendee tables.
 12 A. Yes, that's right.
 13 Q. Play on, please.
 14 (Video played)
 15 Second image here, pause. Can you tell us what
 16 we're looking at here?
 17 A. This is Usman Khan in the queue, I think, for the
 18 brunch, talking to an individual called Steve Machin.
 19 Q. I think Mr Machin is, in fact, a senior prison official?
 20 A. That's right, yes.
 21 Q. And do we see in this shot that Usman Khan can be
 22 clearly seen wearing that padded jacket?
 23 A. Yes, the quite distinctive jacket. It's quite big.
 24 Q. Play on, please, and pause at the next shot.
 25 Again the brunch area, this time at 11.08, with

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1 Usman Khan and Jack Merritt both identified?
 2 A. Yes.
 3 Q. Play on, please. The same scene, I think, from
 4 a different perspective?
 5 A. Yes, I think that's the same photograph we saw earlier
 6 on with him eating his brunch.
 7 Q. Pause here. And another scene from the same time,
 8 Usman Khan now visible in the centre of the room with
 9 his jacket, I think, unzipped to around the midriff.
 10 A. That's correct, yes.
 11 Q. Play on, please.
 12 (Video played)
 13 Now in the Banqueting Hall at 11.17?
 14 A. Yes, and again wearing his coat.
 15 Q. Pause there. The Banqueting Hall at 11.23, Usman Khan
 16 at the table and Saskia Jones standing?
 17 A. That's right, yes. We don't believe they knew each
 18 other prior to this day.
 19 Q. Play on, please. This is, I think, a short video from
 20 the Banqueting Hall with Usman Khan pointed out, and he
 21 seems to be talking to Saskia Jones.
 22 (Video played)
 23 A. Yes.
 24 Q. This I think is actually timed at 11.56.
 25 A. Yes.

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1 Q. We can see him talking quite animatedly.
 2 A. Yes, we don't know what the content of that conversation
 3 was.
 4 Q. Pause here. 11.59, a few minutes later, again showing
 5 Usman Khan and Saskia Jones at that table?
 6 A. Yes.
 7 Q. Play on, please. An image a minute or so later.
 8 A. Yes.
 9 Q. Another image closer up.
 10 A. Saskia.
 11 Q. Another image a couple of minutes after that.
 12 Pausing here, 12.03, the room is starting to fill up
 13 rather more, and we can see Usman Khan from behind at
 14 this point.
 15 A. We can, yes, but it appears that his jacket is still
 16 round his waist, even though he has taken it off.
 17 Clearly everybody else in the room has taken off their
 18 coats and put them in the cloakroom, it's quite warm in
 19 that building, we're told.
 20 Q. So in the shots that we had been looking at earlier he
 21 seemed to have the jacket on although unzipped to about
 22 the midriff.
 23 A. Yes.
 24 Q. In this shot at 12.03 he seems to have taken the jacket
 25 off, but we can just about see from looking at the back

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1 of the chair behind him that it's still wrapped around
 2 him?
 3 A. Yes, I think he unzipped it halfway and slipped out his
 4 arms and dropped it to his waist.
 5 Q. Play on, please. We will see a short video from
 6 a couple of minutes later.
 7 (Video played)
 8 And another short video also after that.
 9 (Video played)
 10 Pause here. This is a front view of the same scene,
 11 12.09.
 12 A. Yes.
 13 Q. Then in a moment we're going to see an image looking
 14 towards the stage with the organisers of
 15 Learning Together on the stage?
 16 A. That's right, yes, Ruth Armstrong and Amy Ludlow.
 17 Q. Play on, please.
 18 (Video played)
 19 We now move to a short video of their opening
 20 speech.
 21 Pause there. So that was 12.14, the opening session
 22 just having begun.
 23 A. That's correct, yes.
 24 Q. At 12.17, we're looking at an image of Usman Khan
 25 watching those opening speeches?

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1 A. Yes, and again, you can see his coat wrapped around his
2 waist.
3 Q. And I think the next image we'll see will be David
4 Robertson from The Fishmongers' Company giving a small
5 welcome speech.
6 A. Yes.
7 Q. Play on, please.
8 (Video played)
9 Usman Khan and Saskia Jones there pointed out.
10 I think we're now seeing a video at 12.26 of the
11 point in time when those attending divided into the two
12 breakout rooms?
13 A. That's correct, yes. Khan remained in this room, Saskia
14 and Jack moved into the other room, the Court Drawing
15 Room, and then this is the second -- the workshop.
16 Q. So pause here. This, I think, is a workshop led by
17 a lady called Dani Hedlund, a turning points workshop
18 taking place in the Banqueting Hall with Usman Khan
19 present.
20 A. Yes.
21 Q. Play on, please.
22 (Video played)
23 12.31, Usman Khan appears to have put his jacket
24 back on.
25 A. Yes.

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1 Q. Back fully on?
2 A. That's right.
3 Q. It is very clear from that photo at 12.32.
4 Pause here. We're now, I think, going to show
5 a short video from the Court Drawing Room with Saskia
6 and Jack shown in the workshop session which had begun
7 there, 12.36?
8 A. That's right, yes. I believe Jack was facilitating this
9 workshop, though he's sort of stood to one side, and
10 then you can see Saskia in the middle.
11 Q. We'll see, I think, that it was being led by
12 a performance poet from the USA I think called
13 Bryonn Bain?
14 A. That's right.
15 Q. Play on, please.
16 (Video played)
17 Then we're back in the main hall, 12.39, with
18 Usman Khan looking on.
19 A. That's right.
20 Q. 12.51, another image of him in that session. Pause
21 there.
22 At 12.56, I think we can now see that his jacket
23 appears to be fully undone, but on him.
24 A. That's right, yes.
25 Q. Play on, please.

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1 (Video played)
2 So I think there's a video about 1 o'clock in the
3 Banquet Hall.
4 A. Yes.
5 Q. And then another short video showing Usman Khan with
6 a rear view?
7 A. Yes.
8 Q. Now just looking at an image and a video from the rear
9 of the room, giving an idea of the numbers of people
10 here and Usman Khan in his position.
11 A. Yes.
12 Q. A still image, 13.10 of the same scene. A closer view
13 at 13.16. Another image from 13.21.
14 A. Yes.
15 Q. Usman Khan's view of the stage, 13.22. Pause here.
16 As the animation has told us, this image at 13.23,
17 the last picture of Usman Khan before the attack.
18 A. That's correct, yes.
19 Q. We can see him leaning on the table with his jacket
20 fully on.
21 A. Yes.
22 Q. Then we're now about to move through to the other room,
23 the drawing room, with the creative writing workshop
24 showing some imagery of Saskia and Jack. Play on,
25 please.

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1 (Video played)
2 Pause here. This video I think is now 13.37, the
3 time as you told us earlier when Jack left the building
4 briefly during the break after that session.
5 A. That's right, yes.
6 Q. Play on, please.
7 A. You can see the member of staff I referred to earlier
8 just letting him out.
9 Q. He goes down some stairs to an area where people are
10 smoking.
11 A. Yes.
12 Q. Pause here. We've just seen Jack put a vape cigarette
13 in his pocket, I think.
14 A. That's right, yes.
15 Q. And then entering the building by the main entrance
16 door, 13.39.56, I think.
17 A. Yes.
18 Q. The screen time is out by about an hour.
19 A. That's right, yes.
20 Q. Play on.
21 (Video played)
22 A. You can see he has to be let back into the building by
23 the security guard.
24 Q. Pause here. There's a still image from the Banqueting
25 Hall at 13.48. As the animation has pointed out, Khan

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1 is no longer seated where he was?
 2 A. That's right, yes. It looks like the workshop has
 3 finished and people are milling around.
 4 Q. Play on, please. We're about to see the image we saw
 5 a little earlier with Jack Merritt in the vestibule area
 6 with Simon Larmour, Steven Gallant and Ruth Armstrong?
 7 A. Yes, from his own phone.
 8 Q. Now an image, pausing there, 13.53 we looked at earlier,
 9 with Jack Merritt next to Mr Ormerod back in the main
 10 banquet hall, the last image before he was attacked?
 11 A. Yes.
 12 Q. Then play on, please.
 13 (Video played)
 14 We are now about to see Saskia Jones leaving the
 15 entrance door, 13.47, behind Mr Machin, moving toward
 16 the smoking area?
 17 A. Yes.
 18 Q. And that, I think, ends the first part of the
 19 compilation.
 20 A. Yes.
 21 Q. I'm now going to move, with your assistance, to the
 22 second part, {AV0015}. Is it right that this part of
 23 the compilation includes some more graphic content?
 24 A. Yes.
 25 Q. And quite early on, I think, as the second clip we'll

1 see will be the footage -- pause there, please -- of
 2 Jack Merritt in an injured condition coming into view of
 3 that front door.
 4 A. That's right. It's the moving image of the still that
 5 we saw earlier on with him through the window.
 6 Q. So first of all I think we're going to see the last
 7 images of Saskia Jones before the attack, her
 8 re-entering Fishmongers' Hall at 13.56.47. Play on,
 9 please.
 10 (Video played)
 11 A. We believe that once Saskia entered the building she
 12 went straight to the cloakroom to put her coat into the
 13 cloakroom, so she would have gone directly into where
 14 then she was then attacked by Khan.
 15 Q. So she's entering at 13.57, and then 45 seconds later
 16 we're going to see Jack Merritt at the window in his
 17 injured state.
 18 A. Yes.
 19 Q. It must be over this period of time that the attack is
 20 taking place.
 21 A. We believe so, yes.
 22 Q. Now we see Jack come into view briefly, and it's going
 23 to be zoomed and slowed down for a moment in the next
 24 clip.
 25 We now, I think, see the previous footage not zoomed

1 in, continue from 13.58.
 2 A. That's right.
 3 Q. I think in a little over a minute we're going to see
 4 three people, Marc Conway, Michelle Molver and Steve
 5 Machin, approach the entrance door, then look through
 6 the glass and turn away?
 7 A. Yes, at 13.59.37 but on that screen it will be 14.59.30.
 8 Q. And we'll be able to tell from this and their evidence
 9 that the attack was raging inside as they are seen to
 10 look through the glass panel of the door?
 11 A. Yes, when you watch the CCTV you can clearly see them
 12 react to something going on inside.
 13 Q. Just to be clear, the reason we're not looking at CCTV
 14 from inside the building is that there wasn't any?
 15 A. There was none inside, no, it was all external CCTV. We
 16 can just see them walking towards the door now.
 17 Q. So we're now at 13.59.37. They look inside and they run
 18 away.
 19 Now, in about 30 seconds we're going to see,
 20 I think, Usman Khan leaving the Fishmongers' Hall by
 21 that entrance door, carrying the knives in his hands?
 22 A. Yes, that's right.
 23 Q. I think the time of him leaving will be 14.00.43 on the
 24 corrected --
 25 A. On the corrected time, yes. I think it displays

1 15.00.36 on the screen. You can see inside -- you can
 2 see the narwhal tusks being used.
 3 Q. Pausing there, so we can see Usman Khan with a knife in
 4 his right hand up to his baseball cap, Mr Gallant behind
 5 him?
 6 A. He appears to be shouting something as well, yes.
 7 JUDGE LUCRAFT: Back a moment in that footage, Mr Hough,
 8 I think we can see in the other hand too an item?
 9 MR HOUGH: Yes, if we can reverse by just a few seconds and
 10 then play on, please.
 11 (Video played)
 12 Pause there. I don't know if it's possible to move
 13 back to the time on screen 15.00.36. So going back
 14 about 11 seconds.
 15 (Video played)
 16 So we see he has both knives. Mr Gallant comes out
 17 immediately behind. Khan rushes back at him for
 18 a moment. Then Mr Gallant comes out again with the
 19 narwhal tusk, a narwhal tusk. Pause there. Now, just
 20 to understand this, we saw Mr Gallant follow him out
 21 carrying a narwhal tusk, go down the stairs after him,
 22 and initially using the narwhal tusk against him?
 23 A. Yes.
 24 Q. I think we saw that Usman Khan grabbed the narwhal tusk
 25 from him?

1 A. Yes.
 2 Q. And we can see the two of them squaring off just to the
 3 top left —hand corner of the image?
 4 A. Yes, I think Mr Gallant followed him and then as Khan
 5 returned, he then retreated.
 6 Q. We'll see also Mr Crilly on the steps with the fire
 7 extinguisher spraying at Khan.
 8 A. Yes, with the grey hair and the blue polo shirt.
 9 Q. And we can see at the top of the steps immediately
 10 behind Mr Crilly, Lukasz Koczocik with obvious injuries?
 11 A. Yes.
 12 Q. Play on, please.
 13 (Video played)
 14 Pause here, so we can see that Mr Crilly and
 15 Mr Gallant have gone after Usman Khan and now
 16 Darryn Frost is coming out with a second narwhal tusk —
 17 A. Yes.
 18 Q. — in his hand. We're now at about 14.01.
 19 A. Yes.
 20 Q. If we play on, please, we can now see all three men
 21 going after Khan at speed.
 22 A. That's right. You can see Lukasz is bleeding quite
 23 heavily there. There's blood on the steps as well.
 24 Q. Now, if we can pause there and move on in the footage to
 25 8 minutes and 26 seconds into the footage, 08.26. Pause

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1 there, please.
 2 Now, we're about to see footage from the City of
 3 London Police camera 115, which you identified on the
 4 lamppost to the north of Fishmongers' Hall?
 5 A. That's correct, yes.
 6 Q. Is it right that this camera is controlled by the
 7 operator, to an extent?
 8 A. It is. So initially it will be controlled on a kind of
 9 pan, on an automatic pan, and then once it has
 10 identified there's something happening, then the
 11 operator will take control of the camera and then focus
 12 on that particular incident. So I think there's
 13 a period when you see a bus within this footage, and
 14 then clearly the operator takes control and starts
 15 focusing on what's taking place on the pavement.
 16 Q. So the start of this footage, as we see the image frozen
 17 here, the camera is, I think, pointing towards the
 18 junction with Cannon Street. It will then move its
 19 viewpoint towards Fishmongers' Hall and then zoom in?
 20 A. That's right.
 21 Q. Play on, please.
 22 (Video played)
 23 First of all, I think the timing on this footage is
 24 correct?
 25 A. That's right.

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1 Q. And we've seen Usman Khan at 14.00.46, now circled
 2 yellow, come out of the entrance of Fishmongers' Hall,
 3 begin to walk down the steps and then head back briefly
 4 with those two knives brandished?
 5 A. Yes, exactly the same as what we've just seen with the
 6 other CCTV image.
 7 Q. We will see him turn right towards London Bridge,
 8 I think, a bus blocking the view of him for a time, and
 9 various members of the public running away.
 10 A. That's right, yes.
 11 Q. Play on, please.
 12 (Video played)
 13 You saw his jacket was open in that shot?
 14 A. That's right, and you can see various members of the
 15 public running away.
 16 Q. Pause here. If we now just focus on the area
 17 immediately at the back of the bus, we'll see, I think,
 18 Mr Frost with the tusk, Mr Crilly with the extinguisher,
 19 and Mr Gallant in the purple jumper running after Khan
 20 and confronting him?
 21 A. Yes, they're the three individuals that initially tried
 22 to subdue Khan before other people assisted them.
 23 Q. And then a few seconds after that we'll see Khan go down
 24 to the ground.
 25 A. That's right.

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1 Q. Play on, please.
 2 (Video played)
 3 They're chasing after him now. Pause here. This is
 4 now 14.01.29. They've caught up with him. Do we see
 5 Mr Frost jabbing at him with the narwhal tusk?
 6 A. That's right, yes.
 7 Q. Mr Crilly spraying at him with the extinguisher, and
 8 Mr Gallant waiting to one side before moving in?
 9 A. Yes.
 10 Q. Then over the next seconds we'll see Usman Khan go down
 11 to the ground and Mr Gallant pushing him down and then
 12 the knives being knocked from his grasp first of all by
 13 Mr Crilly with the extinguisher?
 14 A. That's right, yes. I think he tries to kick the knife
 15 out of his hand as well.
 16 Q. Play on, please.
 17 (Video played)
 18 And pause here. We can now, I think, see that
 19 they've been joined by a number of members of the public
 20 coming to help, Mr Meek, Mr Morgan, Mr Mumuni and
 21 Mr Conway, who we saw earlier?
 22 A. That's right, yes. I think some people were in cars,
 23 some people were on foot, Mr Meek is a police officer
 24 that was on his way.
 25 Q. And this is 14.01.47?

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1 A. Yes.
 2 Q. And play on, please.
 3 (Video played)
 4 We see a number of other individuals arriving.
 5 Pause there. You see Mr Machin, the prison official,
 6 coming to join.
 7 A. Yes.
 8 Q. Do we see a number of people trying to get those knives
 9 out of his hands --
 10 A. Yes.
 11 Q. -- to which, of course, they've been taped?
 12 A. Absolutely, yes. It would have been difficult.
 13 Q. Play on, please.
 14 (Video played)
 15 Pause there, please. We're now at 14.02.14.
 16 I think in a second or two we're going to see the first
 17 police officers come into view?
 18 A. Yes, they'll come in from the left. I think their
 19 vehicle was parked on the other side of the barrier, so
 20 they jumped over two barriers before they arrived by car
 21 and on foot.
 22 Q. These will be, I think, armed response officers from the
 23 City of London Police?
 24 A. Yes.
 25 Q. With the pseudonyms YX99 and YX16?

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1 A. Yes.
 2 Q. We see them first of all moving members of the public
 3 and people attending the event away from Khan?
 4 A. That's right, yes.
 5 Q. Play on, please.
 6 (Video played)
 7 Pause here. Do you see they have been joined by a
 8 third officer, WS5.
 9 A. Yes.
 10 Q. Another City of London armed response officer?
 11 A. All part of the same team, yes.
 12 Q. We are now at 14.02.29, and Mr Gallant and Mr Frost
 13 I think the last two to be near Khan?
 14 A. Yes, that's right. Mr Frost is the last person to leave
 15 him.
 16 Q. It's now 14.02.29. In a few seconds we'll see the
 17 officers start to back away.
 18 A. Yes.
 19 Q. Can you remind us what you consider, based on the
 20 evidence, was the cause of the officers doing that?
 21 A. Because I believe at that stage they identified that
 22 he was wearing what appeared to be an IED.
 23 Q. An improvised explosive device?
 24 A. Yes.
 25 Q. Play on, please.

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1 (Video played)
 2 A. You will see when people start to back away it's because
 3 the officers start to shout, I think, words to the
 4 effect of "bomb", which causes people to realise in the
 5 vicinity.
 6 Q. Pause there. You just told us that the officers
 7 shouted.
 8 A. Yes.
 9 Q. Not obviously audible on this footage because this
 10 footage doesn't have audio.
 11 A. No.
 12 Q. But from the evidence you have seen and the other
 13 footage you have seen, a lot of evidence that the
 14 officers were shouting about a bomb or an IED?
 15 A. Yes.
 16 Q. And that therefore explains, does it, the sudden
 17 reaction of many people backing away?
 18 A. Yes.
 19 Q. Even now Mr Frost still by Khan until quite a late
 20 stage?
 21 A. That's right.
 22 Q. Play on, please.
 23 (Video played)
 24 Mr Frost has moved away, and pause there. What did
 25 we see in the last couple of seconds?

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1 A. So one of the officers discharges his firearm towards
 2 Khan and the other officer at the top of the screen
 3 discharges a taser. You can see the barbs as they
 4 entered.
 5 Q. Now, taser obviously operates by shooting darts --
 6 A. Yes.
 7 Q. -- with wires connected to the taser as they connect
 8 with the person fired at, and we can see, I think, the
 9 wires from the officer whose taser had been fired
 10 leading towards Khan.
 11 A. That's right.
 12 Q. Which will be more visible when the image begins moving
 13 again. We can see also, I think, as Mr Frost is moving
 14 away towards us, his hands up by his ears?
 15 A. Yes, the sound of the gunfire would have been pretty
 16 loud that close.
 17 Q. I think it was YX16 firing his taser at Khan.
 18 A. Yes.
 19 Q. And YX99, the officer with a firearm raised firing at
 20 Khan at this moment, 14.02.51.
 21 A. Yes.
 22 Q. Play on, please.
 23 (Video played)
 24 Do we see now the officers backing further away as
 25 Khan lies in position but writhes on the ground?

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1 A. That's right, yes. They're trying to create some
2 distance and move the public back.
3 Q. We can see now, I think, that Khan is holding his coat
4 over his head while lying down.
5 A. Yes.
6 Q. And we can see quite clearly there the fake suicide belt
7 around his lower torso.
8 A. Yes.
9 Q. Pause here. I think we're now looking at imagery from
10 a different CCTV camera, one fixed on a building to the
11 north of Fishmongers' Hall.
12 A. Yes.
13 Q. Now, the screen time here is 14.00.20; is that correct?
14 A. Yes.
15 Q. We'll see from this different perspective Khan come down
16 the steps of Fishmongers' Hall in about 30 seconds.
17 Play on, please.
18 (Video played)
19 Is it right that this footage gives us an idea of
20 the numbers of people in the area and their reactions as
21 Khan comes down the steps?
22 A. That's right, yes, you can definitely see a response.
23 Q. We're about to see him come down the steps.
24 A. There he is.
25 Q. Yes.

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1 A. You can immediately see people running.
2 Q. We can see signs of the fire extinguisher being let off.
3 A. Yes.
4 Q. If we continue watching at 14.01.50, so in about
5 30 seconds from now, we'll see the first armed response
6 vehicle, City of London Police, coming down King William
7 Street from the north.
8 A. That's right, yes, on the left-hand side.
9 Q. Trojan City 2 is the call sign.
10 A. Yes.
11 Q. Now, if we can move from there, please, to a different
12 point on the footage, tape counter 16 minutes and
13 51 seconds, the next clip. We're now going to look at
14 footage from a CCTV camera situated on a building
15 directly across the road from Fishmongers' Hall?
16 A. Yes, that's right, a private one.
17 Q. This is Adelaide House, a building we may hear a little
18 about later, with a camera directly facing
19 Fishmongers' Hall and the relevant part of the screen
20 highlighted?
21 A. Yes.
22 Q. Play on, please.
23 (Video played)
24 We see Usman Khan come down the steps, followed by
25 Mr Gallant, Mr Crilly and Mr Frost.

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1 A. Yes, you can see Mr Gallant's white shoes.
2 Q. He initially has the narwhal tusk, it's taken from him.
3 Mr Crilly firing the extinguisher, and he, Mr Gallant,
4 and Mr Frost heading straight after Mr Khan. Pause
5 there.
6 Are we now looking at imagery from another fixed
7 CCTV camera on the same building?
8 A. Yes, Adelaide House, yes.
9 Q. Looking further to the south towards the area of
10 London Bridge where Khan was pinned down and brought to
11 the floor?
12 A. That's right, yes. You can just see the River Thames
13 behind.
14 Q. And then in about six seconds after the start -- sorry,
15 about a minute after the start, we'll see Khan come into
16 view, chased by Gallant, Crilly and Frost, who take him
17 to the floor.
18 A. Yes.
19 Q. Play on, please.
20 (Video played)
21 A. I believe the three individuals on the right are those
22 that went to the door and then turned away as well,
23 Mr Machin and the other two individuals. So they
24 actually crossed the road away.
25 Q. That's Mr Conway and Ms Molver in the middle of

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1 the road?
2 A. That's right. We can now see members of the public
3 running away.
4 Q. 14.01.18 on the counter, we'll see Khan come into view,
5 I think.
6 A. Yes.
7 Q. Again it's Mr Crilly and Mr Gallant and Mr Frost. Then
8 we see members of the public --
9 A. Yes.
10 Q. -- and Mr Conway and others running in to help?
11 A. That's right.
12 Q. We can just about see the police officers arriving from
13 across the road, pulling people away from Khan.
14 A. Yes.
15 Q. Can we pause there and move on the tape counter to
16 21 minutes and 52 seconds. I think we're going to view
17 the scene now from a different perspective. The
18 dashboard camera of a Sainsbury's delivery van. Pause
19 there, please. The van moving slowly in the northbound
20 carriageway, so the same side of the road as the
21 confrontation with Khan, and Fishmongers' Hall visible
22 on the left.
23 A. That's right, yes, and I think the camera is -- the time
24 is correct on that one.
25 Q. So 14.01.08, and in about 12 seconds we'll see Khan come

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1 into view?
 2 A. That's right, coming towards us.
 3 Q. Play on, please.
 4 A. We can just see the fire extinguisher in the background.
 5 Just make out Khan's blue coat.
 6 Q. Then we saw Mr Gallant bring him down there?
 7 A. Absolutely, yes.
 8 Q. Mr Mumuni and Mr Meek coming in to help.
 9 A. Yes.
 10 Q. While Mr Gallant and Mr Crilly are trying to get the
 11 knives from him. Pause here.
 12 Now, 14.01.57, we saw the first armed response
 13 vehicle come into view, coming south on King William
 14 Street onto London Bridge.
 15 A. That's right, yes, you can just see it on the right.
 16 Q. I think it's being flagged down by Desmond Bockarie,
 17 a taxi driver, who is standing on the central
 18 reservation?
 19 A. That's right.
 20 Q. And that's 14.02. Then over the next seconds we'll see
 21 the first officers moving out of that armed response
 22 vehicle heading towards the melee?
 23 A. That's right, yes, YX16 and YX99.
 24 Q. Play on, please.
 25 (Video played)

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1 So YX16 across the road first, followed by YX99 and
 2 then WS5.
 3 A. Yes.
 4 Q. Pause here. Just to be clear, the reason their faces
 5 are obscured is, again, for the purposes of anonymity?
 6 A. That's right.
 7 Q. We've seen the first two officers, YX16 and YX99, move
 8 in, and we will see them from this further perspective,
 9 will we, dragging people away from Khan and then
 10 leveling their weapons?
 11 A. Yes.
 12 Q. Play on, please.
 13 (Video played)
 14 If you can pause there and move to tape counter to
 15 25.22 we're about to see, I think, body-worn video
 16 footage from YX16, the first of the armed response
 17 officers to cross the road.
 18 A. Yes.
 19 Q. And is it right that this officer, like a number of
 20 others who attended the scene, had a body-worn camera
 21 that they activated?
 22 A. That's right, yes.
 23 Q. Footage from these is variable quality?
 24 A. And sound.
 25 Q. But in this case some relatively useful footage?

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1 A. Yes.
 2 Q. As the screen tells us, the screen timings are a little
 3 over 9 minutes fast and, as you have told us, there is
 4 sound on this footage.
 5 A. That's right.
 6 Q. The footage will begin with YX16 crossing the road from
 7 his vehicle towards the fracas?
 8 A. Yes.
 9 Q. And we will see him approaching the group at screen time
 10 14.11.23 but actual time 14.02.17?
 11 A. That's right.
 12 Q. Play on, please.
 13 (Video played)
 14 Pause here. I think the next thing we'll see as
 15 he's approached is this officer and then his colleagues
 16 clearing people away from Khan?
 17 A. Yes.
 18 Q. And will we hear some of the members of the public
 19 saying and some of the attendees from the event saying
 20 something to the officers?
 21 A. Yes. There are shouts that Khan has a bomb, or
 22 "A bomb!".
 23 Q. I think we may also hear shouts that Khan has killed two
 24 women inside?
 25 A. Yes, that's right.

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1 Q. Play on, please.
 2 (Video played)
 3 Pause there. This is right: we're looking at this
 4 from the perspective of YX16, the officer with the
 5 taser. He has moved away after those shouts of "He's
 6 got a bomb!".
 7 A. Yes.
 8 Q. Can we see Mr Frost still holding on to Khan?
 9 A. Yes.
 10 Q. As the other two officers move Mr Frost away before the
 11 taser is fired?
 12 A. That's right, yes. So one officer is trying to move him
 13 away and the other is trying to take up a position.
 14 Q. And in the moments that follow, I think we'll see the
 15 taser fired and a firearm discharged from the other two
 16 officers?
 17 A. That's correct, yes.
 18 Q. Play on, please.
 19 (Video played)
 20 Q. We see the wires from the taser.
 21 A. That's right.
 22 Q. Pause there. So in those last few seconds we've seen
 23 YX16 run north with the taser wires still trailing?
 24 A. Yes.
 25 Q. And other officers have moved back to a position of

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1 distance yelling to Khan to stay still ?
 2 A. Yes.
 3 Q. And now approximately 14.03.
 4 A. That's right, yes.
 5 Q. Now, on this compilation we then have some body—worn
 6 footage from YX99, which is much less good quality video
 7 imagery.
 8 A. That's right, yes.
 9 Q. And we have various clips taken by members of the public
 10 which I don't intend showing at this point. Instead can
 11 we move to compilation 3, part 3, {AV0016}. So it's
 12 probably best for that to be the last for today.
 13 JUDGE LUCRAFT: Yes. We haven't taken a break, Mr Hough,
 14 because I didn't want to break the flow of watching the
 15 footage. We will perhaps reward ourselves with doing
 16 that and then finishing for the day.
 17 MR HOUGH: Yes. So if we move to part 3, {AV0016}, the next
 18 footage I think will be from the operator controlled
 19 camera of a police helicopter.
 20 A. That's right, yes. The helicopter was actually already
 21 over London, involved in policing a demonstration at the
 22 time when they received the call.
 23 Q. Pause here. As you've told us, the helicopter was over
 24 London, I think immediately above Parliament Square,
 25 policing a demonstration.

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1 A. That's right, I think that's Westminster Abbey there on
 2 the right.
 3 Q. We can see Westminster Abbey and various other buildings
 4 around Parliament Square. We'll see and hear it
 5 diverted to the scene because we can also hear audio on
 6 this footage?
 7 A. That's right.
 8 Q. Now the footage is, I think, starting at 14.05.38. Is
 9 that the correct time?
 10 A. Yes.
 11 Q. By this time, of course, shots have already been fired,
 12 and we'll hear some discussion of the fact that shots
 13 have been fired.
 14 A. Yes.
 15 Q. And we'll hear also confirmation from two armed response
 16 vehicles, Trojan City 1 and Trojan City 2, that they are
 17 on scene at London Bridge?
 18 A. That's right, yes, and it's probably worth pointing out
 19 that the imagery would have been beamed into HQ so other
 20 officers taking command and control can view what was
 21 being seen from the helicopter.
 22 Q. Play on, please.
 23 (Video played)
 24 Pause here, please. It's now 14.06.51. Has the
 25 police helicopter now reached over London Bridge near

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1 Fishmongers' Hall?
 2 A. It has, yes, you can actually see the Trojan unit parked
 3 in the middle of the road there.
 4 Q. That's Trojan City 2, is it, the first armed response
 5 vehicle on scene, right in the middle. And we've just
 6 heard the operator on the audio asking for units to
 7 identify themselves?
 8 A. Correct.
 9 Q. And we'll hear, I think, over the seconds that follow,
 10 questions about whether the IED on Usman Khan is viable
 11 and about the proximity of members of the public.
 12 A. That's right.
 13 Q. Play on, please.
 14 (Video played)
 15 Pause here, please. Now, 14.07.40, the camera
 16 focusing on Usman Khan.
 17 A. Yes, still moving.
 18 Q. And we can see at this point his arms moving above his
 19 head with the jacket now over his head.
 20 A. Yes.
 21 Q. Will we then hear some instructions given for officers
 22 to direct the public away and to make the bridge
 23 a sterile area?
 24 A. Absolutely, yes, to try and move the public to a safe
 25 location.

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1 Q. Play on, please.
 2 A. There's traffic underneath the bridge as well.
 3 (Video played)
 4 Q. Pause, please. That's 14.08.21. I think we're about to
 5 see Khan roll over on to his side, and then shortly
 6 after that, moving his hands around his jacket.
 7 A. Yes.
 8 Q. And the apparent suicide vest shown more clearly.
 9 A. It can be seen quite clearly, yes.
 10 Q. Play on, please.
 11 (Video played)
 12 Pause there. Did we just hear the operator refer to
 13 this as a "viable IED"?
 14 A. Yes.
 15 Q. I think very shortly we're going to hear a reference to
 16 the situation being declared Plato. In a sentence or
 17 two, can you tell us what that means?
 18 A. So when a Plato is declared, it's normally as a result
 19 of what we believe to be a potential marauding terrorist
 20 attack and it triggers a series of police responses and
 21 procedures, if you like, from armed officers.
 22 Q. So Operation Plato is a set of tactics or strategies for
 23 responding to a marauding terrorist attack —
 24 A. That's right, yes.
 25 Q. — set off by a specific declaration?

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1 A. Yes, we believe there's an attack and there's the
2 potential that there may be other terrorists conducting
3 a marauding attack.
4 Q. We'll also, I think, then hear about instructions for
5 rendezvous points for armed response vehicles to the
6 north and south of the bridge?
7 A. That's right.
8 (Video played)
9 Q. Pause there. It's now 14.10.23. We have just heard the
10 description of Usman Khan writhing around, as you would
11 after being shot.
12 A. Yes.
13 Q. And is this right: we're about to see him sit up, and at
14 around the same time, the helicopter camera zoom out?
15 A. Yes.
16 Q. Play on, please.
17 (Video played)
18 Pause there. He is now sat up. It's 14.10.40.
19 Will we shortly see him fall back down again?
20 A. Yes.
21 Q. Are you able, based on the other footage you have seen
22 and the evidence you have received, to tell us what's
23 happening at this point?
24 A. There's more armed officers that have arrived by now and
25 you can see three or four to the right. At this point

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1 they decide to discharge their firearms towards Khan,
2 and I believe you can see some sort of clouds coming off
3 him, which appears to be him being shot again several
4 times.
5 Q. This happening shortly after he has sat up?
6 A. Yes.
7 Q. Play on, please.
8 (Video played)
9 Pause there, please. It's now 14.11.23. Just to
10 get our timings right, we saw Khan fall back down at
11 around 14.10.42.
12 A. Yes.
13 Q. We heard some discussion of possible authorisation of
14 a critical shot shortly after that.
15 A. Yes.
16 Q. So after some shots had been fired. 14.11.00 we saw
17 Usman Khan moving, continuing to move to an extent,
18 injured?
19 A. Yes.
20 Q. I think at 14.11.36, we will hear on the radio the words
21 "critical shot authorised".
22 A. Yes.
23 Q. And is this right: that some of the shots were fired
24 unquestionably before the authorisation of critical
25 shot?

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1 A. Yes.
2 Q. But it appears that there was some firing after that
3 authorisation as well?
4 A. Yes.
5 Q. Play on, please.
6 (Video played)
7 14.12.14, we've zoomed in again over Usman Khan.
8 A. Yes, there's no longer any movement.
9 Q. No further movement from 14.12.
10 A. That's right.
11 MR HOUGH: Pause there, please.
12 Sir, would that be a convenient moment?
13 JUDGE LUCRAFT: It will. Ladies and gentlemen, thank you
14 very much indeed for your care and attention today. We
15 will break there for the day and we'll start again
16 tomorrow morning, please, at 10 o'clock.
17 Can I just remind you of what I said right at the
18 beginning. Please, it might be very tempting when you
19 get home to want to talk to people about what you've
20 seen. Can I just remind you that that's not what
21 I would like you to do. Please, the word is keep your
22 own counsel. Of course when you are together in the
23 privacy of your jury room, naturally you want to talk
24 about the evidence you've been listening to, but please
25 don't be tempted to talk to mum or your best friend

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1 tonight. As I say, it's really your collective 11 views
2 that we are interested in ultimately, not the views of
3 11 of you plus each of your best friends, all right.
4 Thank you very much for, as I say, your clear
5 attention today. I'm sorry I can't see all of you very
6 clearly, and I just want to check. Sir, can I ask you
7 on the back row, is the sun affecting your view of the
8 screens? It's okay, is it? The lady in the middle,
9 I think it was a bit difficult earlier on. It's
10 difficult to complain about the weather in this country,
11 it's either too wet, too sunny or too something, but if
12 it becomes a real problem, we'll do something about it.
13 Thank you very much, I'll look forward to seeing you
14 all, please, for 10 o'clock tomorrow.
15 (4.09 pm)
16 (The court adjourned until 10.00 am on
17 Tuesday, 13 April 2021)
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