

OPUS2

Fishmongers' Hall Inquests

Day 7

April 21, 2021

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1 Wednesday, 21 April 2021
 2 (10.00 am)
 3 (In the presence of the jury)
 4 JUDGE LUCRAFT: Good morning, Mr Hough. Good morning,
 5 everybody.
 6 MR HOUGH: Good morning, sir. Our first witness is
 7 Jojo Athappilly.
 8 MR JOJO ATHAPPILLY (sworn)
 9 JUDGE LUCRAFT: Good morning, sir. Thank you very much for
 10 coming.
 11 A. Good morning.
 12 JUDGE LUCRAFT: If you wish to sit whilst giving evidence,
 13 that's fine with me, whichever you feel most
 14 comfortable, sitting or standing.
 15 A. I'll sit.
 16 JUDGE LUCRAFT: And if you are happy to, please do remove
 17 your mask. If you prefer to keep it on, again, that's
 18 entirely understood. There is a microphone on the desk
 19 there which will help to amplify your voice and you may
 20 be asked to look at some diagrams and pictures. They
 21 will appear on the screen in front of you or on the
 22 larger screens in court.
 23 A. Thank you.
 24 Questions by MR HOUGH QC
 25 MR HOUGH: Would you please give your full name for the

1

1 court.
 2 A. My name is Jojo John Athappilly.
 3 Q. Mr Athappilly, you understand I ask questions first on
 4 behalf of the Coroner and you may then receive some
 5 questions from other lawyers. You made a witness
 6 statement on 3 December 2019 about the matters we are
 7 going to cover, and we may refer to that from time to
 8 time.
 9 On 29 November 2019, were you in London?
 10 A. Yes.
 11 Q. At shortly before 2 o'clock on the afternoon of that
 12 day, where were you?
 13 A. I was just in Borough Market and just on my way across
 14 the bridge towards my workplace, which is in Liverpool
 15 Street.
 16 Q. So walking over London Bridge, heading from the
 17 Borough Market area north towards Liverpool Street
 18 station area?
 19 A. Yes.
 20 Q. And from your perspective, as you were crossing the
 21 bridge, which side of the road were you on?
 22 A. I was on the side of where the guy was.
 23 Q. So on your left, the west pavement?
 24 A. Yes. Yes.
 25 Q. If we bring up on screen a photograph, {PH0002/24}, if

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1 we look over slightly to the left of the screen, we can
 2 see the pavement on which you were walking, and you
 3 would have been walking up the photograph north?
 4 A. Yes.
 5 Q. If we leave that on screen for the moment. Where had
 6 you reached over the bridge when your attention was
 7 first caught by events happening in front of you?
 8 A. I was about halfway across, so probably by that first
 9 red bus.
 10 Q. Thank you very much.
 11 What did you first see that stood out?
 12 A. I heard some screams and then I saw a guy kind of swing
 13 his arms at two people and then kind of running, jumping
 14 away and screaming, and... yes.
 15 Q. Let's take that in stages. Where were the screams
 16 coming from that you heard?
 17 A. So just the first blue tent, around there.
 18 Q. That was in a position still on the bridge, but right up
 19 towards the north end of the bridge?
 20 A. Yes.
 21 Q. If we go to the next page of the file {PH0002/25}, just
 22 moving a little closer, and then {PH0002/26}, please.
 23 We're now focusing on that area where that first blue
 24 tent is. So you heard some screams from that direction
 25 and you then say you saw somebody flailing his arms?

3

1 A. Yes.
 2 Q. Where was that person?
 3 A. So he was maybe just in front of the steps, so just
 4 a bit ...
 5 Q. So just at the bottom of the steps to Fishmongers' Hall,
 6 near the upper blue tent?
 7 A. Yes. So that would be where I saw him in the first
 8 place, sorry, I wasn't very clear.
 9 Q. How far would you say it was between you and him?
 10 A. Maybe about 50 metres, maybe.
 11 Q. At that point did you notice anything else about him
 12 other than that he was moving his arms in an exaggerated
 13 way?
 14 A. No, not really.
 15 Q. Now you referred to some other people near him. First
 16 of all, how many people?
 17 A. I saw two.
 18 Q. Where were they?
 19 A. So they were just around — they were quite close to
 20 him, maybe 2 metres away from him, just near the road.
 21 Q. Could you see what they were doing?
 22 A. They were just walking and I think they suddenly just —
 23 then the guy kind of lunged towards them and they
 24 screamed and ran away.
 25 Q. As far as you could see, were they just simply members

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1 of the public --
 2 A. Yes.
 3 Q. -- walking past?
 4 A. Yes.
 5 Q. You say he lunged towards them?
 6 A. Yes.
 7 Q. Did you see whether he was holding anything as he lunged
 8 towards them?
 9 A. At that point I didn't, no.
 10 Q. What did you see next?
 11 A. So I realised something was going on, so he started
 12 running towards me, and so my first reaction was to kind
 13 of run away, but when I looked behind me, there was kind
 14 of a clump of people running away themselves, and
 15 I didn't really want to get caught up with my back to
 16 him, because as he started coming closer, I realised
 17 that he had knives, so I ran kind of towards him.
 18 Q. Looking at your statement, you say that when you saw
 19 this person first, you saw that he was being pushed out
 20 of a building; is that a detail you recall now?
 21 A. I think so, yes. I'm sorry, it's been a while. Yes.
 22 Q. No, we all understand, and it's not a memory test, but
 23 in your statement you say that the first thing you saw
 24 was a figure being pushed out of a building by a bald
 25 white male holding a long stick.

5

1 A. Yes.
 2 Q. And that there were people running in the area at that
 3 point?
 4 A. Yes.
 5 Q. Is that the first thing you saw?
 6 A. That would be, yes. Sorry about that.
 7 Q. No, that's fine. So that's the first thing you saw.
 8 And then you saw the man who had been pushed out towards
 9 the bottom of the steps, flailing his arms as you have
 10 described?
 11 A. Yes.
 12 Q. You thought he was lunging at passers-by and saw them
 13 running away?
 14 A. Yes.
 15 Q. Where were the people running? Which directions?
 16 A. Maybe towards the road, and away.
 17 Q. You also say that you saw during the course of the
 18 period that followed, that the man had a large kitchen
 19 knife in each hand; is that right?
 20 A. Yes.
 21 Q. You have just told us that he started moving towards
 22 you; at what pace did he move?
 23 A. Kind of just running towards me.
 24 Q. You decided that you didn't want to have your back to
 25 him, you've told us, so what did you do again?

6

1 A. Ran towards him.
 2 Q. You ran towards him?
 3 A. Yes.
 4 Q. What was it your intention to do?
 5 A. Well, just kind of run away, to be honest, just keep
 6 away from him, no one else was around him, so just --
 7 Q. So running towards him but keeping away from him?
 8 A. Yes.
 9 Q. It's quite a broad pavement, we can see. Which side of
 10 the pavement did you run along?
 11 A. On the right.
 12 Q. As he came towards you, was there anyone else around
 13 him?
 14 A. No, not at the time.
 15 Q. Could you see whether there was anyone behind him?
 16 A. I'm not really sure I remember, to be honest.
 17 Q. Did you come close to him or pass him?
 18 A. Yes, he was maybe about two metres from me.
 19 Q. Where were you when you came close to him?
 20 A. Probably just by those blue tents. The first blue tent,
 21 sorry.
 22 Q. So you were running along the right side of the
 23 pavement, trying to keep away from him but keeping him
 24 in your view. You couldn't go into the road because
 25 there was a barrier.

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1 A. Well, yes, there was traffic, so I ...
 2 Q. And traffic. And he was running towards you, nobody
 3 else immediately by him at that stage, and you came
 4 within a couple of metres of him?
 5 A. Yes.
 6 Q. What could you see about his appearance at that stage?
 7 A. Just that he was wearing black and that he had two
 8 knives.
 9 Q. Did you get any view of his expression?
 10 A. It was -- yes, I did, yes.
 11 Q. What was his expression?
 12 A. I wouldn't say it was anything really, it seemed quite
 13 passive.
 14 Q. In your witness statement you say that as you ran past
 15 him, keeping him on your left, you looked him in the eye
 16 and he looked confused and awkward in his movements.
 17 A. Yes.
 18 Q. What made you think that? What was there about his
 19 movements that seemed awkward?
 20 A. Just the way he was running, I guess it seemed like
 21 he -- it was -- he was -- he might have been wearing
 22 something or, you know, he was wearing -- he was
 23 quite -- he was wearing, like, a big jacket, so it
 24 didn't seem like he was running freely.
 25 Q. After you passed him, where did you look?

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1 A. After -- I just was running forward and I looked at him
 2 just to keep watch of him, and then I --
 3 Q. So as you were running forwards, you looked back at one
 4 point?
 5 A. Yes.
 6 Q. How far past him had you got when you looked back?
 7 A. Just -- I was looking back straightaway and then I ran
 8 a little bit further on and then I started noticing
 9 people running towards him.
 10 Q. So as you'd got past him you noticed people running
 11 towards you. How many people?
 12 A. I think I saw -- I think I saw maybe -- I definitely saw
 13 one person running with like a long tusk, I think, I saw
 14 it was afterwards, but ...
 15 Q. Now in your statement you describe it as a stick. Did
 16 you appreciate at that point that it was a tusk?
 17 A. No, it was --
 18 Q. Just a big white stick?
 19 A. Yes.
 20 Q. So you saw one person with a big white stick. Any other
 21 people at that stage?
 22 A. I'm not really sure I remember. Sorry.
 23 Q. In your statement, you say that you saw also a man with
 24 a fire extinguisher.
 25 A. Yes.

9

1 Q. Put on screen {DC7421/32}, if we focus on the image
 2 there. The man with the stick, had he reached the man
 3 with the knives while you were looking back?
 4 A. Not as I was running past him. When I got towards --
 5 a bit further than the barriers, when I looked back
 6 then, then he'd reached ...
 7 Q. Looking at this photograph, this still, is that you we
 8 see on the bottom left or is that somebody else?
 9 A. That would be me, yes.
 10 Q. Based on that photograph, you seem to be looking down at
 11 something in your hand; is that a mobile phone?
 12 A. Yes.
 13 Q. And at least at the split second the CCTV still is
 14 taken, you seem to be looking down at that rather than
 15 looking back, but you tell us you were looking back from
 16 time to time?
 17 A. Yes. I think that's me, I'm not entirely sure though.
 18 I'm only saying that's me because I see the glint of my
 19 glasses.
 20 Q. We can take that image off screen now.
 21 As you ran past and looked back from time to time,
 22 did you see the scene developing?
 23 A. Yes.
 24 Q. What did you see?
 25 A. I saw the guy with the stick kind of jabbing the guy

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1 and... from what I remember, the guy with the fire
 2 extinguisher kind of spraying him, and then, yes,
 3 I think he fell on the floor, and then I started calling
 4 the police.
 5 Q. Then you started calling the police on your mobile
 6 phone?
 7 A. Yes.
 8 Q. Did you reach a point near the entrance to
 9 Fishmongers' Hall?
 10 A. Yes, I think I ran past it.
 11 Q. Could you see what was going on in the vicinity of that
 12 entrance?
 13 A. As I ran past, I saw somebody walk out with a bit of
 14 blood on his hand, and some people running out.
 15 Q. Did you make your phone call?
 16 A. Pardon?
 17 Q. Did you make your phone call?
 18 A. Yes.
 19 Q. Were you able to say anything to the operator?
 20 A. Well, I got as far as -- I started mumbling, well,
 21 telling the operator what was happening, and then he
 22 interrupted me to say "Would you like the police or
 23 an ambulance?" at which point I said "Police", and as
 24 the phone started ringing, I saw police cars come, roll
 25 up, so I decided to put the phone down at that point

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1 because I thought the police have already arrived.
 2 Q. At this point did you look around again?
 3 A. Yes.
 4 Q. What did you see?
 5 A. I was a bit -- I was quite far from the scene at this
 6 point, and I just saw him on the floor, and the guys
 7 kind of -- I didn't really -- I can't -- I wouldn't say
 8 I could see what was happening, but I just saw kind of
 9 a bit of a ruckus.
 10 Q. So you saw a group of people around him, obviously in
 11 some kind of engagement with him?
 12 A. Yes.
 13 Q. Could you see what the police were doing, who you tell
 14 us had arrived?
 15 A. They stopped. I saw definitely one police officer get
 16 out with a gun. I was quite far by this point, I think.
 17 And then I heard some shouting, and then people jump
 18 away from the guy on the floor, and then I heard
 19 a gunshot.
 20 Q. You say one gunshot. Was it one or more than one?
 21 A. I think I heard one because it was pretty loud, but
 22 I don't know.
 23 Q. In your statement you say:
 24 "I then clearly heard two gunshots."
 25 A. I'm not sure. I'm a bit hazy, sorry.

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1 Q. That's a hazy detail. That's fine.
 2 Did you then carry on to your destination?
 3 A. Pardon?
 4 Q. Did you then carry on to your destination?
 5 A. Yes. At that point I left, yes.
 6 MR HOUGH: Thank you very much. Those are the questions
 7 I have. It may be that others have questions. I'll
 8 just look to my right to see.
 9 No. Thank you very much for your evidence.
 10 JUDGE LUCRAFT: Thank you very much indeed for coming.
 11 Thank you.
 12 A. Thank you.
 13 MR HOUGH: Sir, the next witness is John Crilly.
 14 JUDGE LUCRAFT: Thank you.
 15 MR JOHN CRILLY (affirmed)
 16 JUDGE LUCRAFT: Good morning, Mr Crilly. If you are happy
 17 to, please do remove your mask, and if you would prefer
 18 to sit whilst giving evidence, there's a seat there. If
 19 you want to stand, that's fine. If you want to start
 20 standing and then take a seat --
 21 A. I'll sit down, please.
 22 JUDGE LUCRAFT: Thank you.
 23 Questions by MR HOUGH QC
 24 MR HOUGH: Mr Crilly, there's a microphone on the desk. If
 25 you try to direct your voice towards it, it will amplify

13

1 what you say.
 2 Could you give your full name for the court record?
 3 A. It's John Anthony Crilly.
 4 Q. Mr Crilly, you understand I'm asking questions first on
 5 behalf of the Coroner and you may then have some
 6 questions from other lawyers?
 7 A. Yes.
 8 Q. You made a witness statement about the matters I'm going
 9 to be asking about on 9 December 2019, and I may refer
 10 to that from time to time.
 11 Did you attend the Learning Together event at
 12 Fishmongers' Hall on 29 November 2019?
 13 A. Yes.
 14 Q. What previous association had you had with
 15 Learning Together that led to you being invited?
 16 A. I met Learning Together in HMP Grendon, I was in
 17 therapeutic prison, they started the Learning Together
 18 initiative off in there. I just got involved in the
 19 second year as a student, and then when I moved prisons,
 20 they helped me finish my degree. Yes, I met them a few
 21 times when I got out of prison, I went to a couple of
 22 events, similar events.
 23 Q. What was the course you did with Learning Together at
 24 HMP Grendon?
 25 A. It was just a module of a criminology degree.

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1 Q. You tell us that you had retained contact with
 2 Learning Together after leaving prison. Had you got to
 3 know a number of the people involved with
 4 Learning Together, including Jack Merritt?
 5 A. Yes. Quite a few people, yes.
 6 Q. Had you met Usman Khan though before 29 November 2019?
 7 A. No.
 8 Q. Did you find, first of all, doing the Learning Together
 9 course and secondly, your contact with the
 10 Learning Together organisers a positive experience for
 11 you?
 12 A. Yes. It was the best experience I've ever had in prison
 13 in terms of, like, helping to change and that, so yes,
 14 I think it's really a meaningful course that they're
 15 running. It's just a shame what's gone on.
 16 Q. In particular did you find it helpful to be studying as
 17 a peer and equal alongside undergraduates on that
 18 criminology course?
 19 A. Yes, most definitely. I think that's the biggest part
 20 of it. It just shows you that you are just as good as
 21 these people that you've always thought you wasn't. It
 22 gives you courage, hope and a purpose, I guess.
 23 Q. In November 2019, were you living and working in
 24 Cambridge?
 25 A. Yes. Yes, I was, yes.

15

1 Q. And had it been arranged for you to travel to the
 2 Learning Together event from Cambridge station that
 3 morning?
 4 A. Yes, that was to meet Gareth, Jack and Simon at the
 5 station.
 6 Q. So Jack Merritt and Simon Larmour, and I think also
 7 Gareth Evans was supposed to be there?
 8 A. Yes, and Gareth was late.
 9 Q. We have heard from other witnesses that Gareth was
 10 a little late in arriving, and that you took the train
 11 with Simon Larmour while Jack waited for Gareth; is that
 12 right?
 13 A. Yes.
 14 Q. We've also heard that once in London, you and Simon went
 15 to Euston station to pick up Usman Khan by
 16 an arrangement he had made?
 17 A. Yes. When we got off the train and we started on the
 18 tubes, I didn't go all the way to meet Usman because my
 19 bag had snapped, I was having a nightmare with my bag so
 20 I just said I would wait here whilst Simon went on, and
 21 Simon come back with him.
 22 Q. But it's right, isn't it, that you and Simon travelled
 23 with Usman from Euston --
 24 A. Yes, yes.
 25 Q. -- to Bank station and then walked together from there

16

1 to Fishmongers' Hall?
 2 A. Yes, that's correct, yes.
 3 Q. If we put on screen {DC7420/32}, if we look at the lower
 4 image, we can see you with the bag that had snapped,
 5 holding it up in your arms?
 6 A. Yes.
 7 Q. And Simon Larmour and Usman Khan at Euston behind you.
 8 Then if we go to page 46 of the same file,
 9 {DC7420/46}, we can see at the top of the page you
 10 walking down King William Street towards
 11 Fishmongers' Hall with Simon Larmour and Usman Khan.
 12 Then in the lower image on that page, you arriving with
 13 the two of them at 9.58 am that morning at
 14 Fishmongers' Hall.
 15 A. Yes.
 16 Q. On the journey you had with the two of them, did you
 17 exchange any words, any conversation, with Usman Khan?
 18 A. No, not at all.
 19 Q. From just looking at him on that journey, did you form
 20 any impression of him?
 21 A. No, I just — I'd been in a dispersal prison with a lot
 22 of terrorist prisoners, so I've got a bit of a — I've
 23 seen what they can do, so I'm a bit wary of them. So
 24 I think I obviously said hello to him, that's everything
 25 I said that morning when Simon introduced us.

17

1 Q. But you didn't get into any sort of discussions with
 2 him?
 3 A. No.
 4 Q. We can take that off screen now.
 5 The jury have heard a lot about the organisation of
 6 the day at Fishmongers' Hall, so I'm going to move
 7 forward in time to the early afternoon, shortly before
 8 2 o'clock that afternoon. Before the events we're
 9 concerned with really began, where were you?
 10 A. I'd come in. I was in a bit of a strop all day, so
 11 I was — I didn't want to even be there, I was in and
 12 out, but when I went in just before things happened,
 13 I went up into the Banqueting Hall to wait for them to
 14 come back, and then to take part in everything.
 15 Q. Is it right that just before 2 o'clock that afternoon,
 16 you were on a balcony on the first floor, speaking to
 17 a retired judge called John Samuels?
 18 A. Yes, me, Gareth and John Samuels.
 19 Q. If we put on screen {PH0050/163}, do we see there the
 20 balcony where you and Gareth Evans were speaking to
 21 John Samuels?
 22 A. Yes.
 23 Q. I think it's right, and we've heard from John Samuels,
 24 that he had been a mentor for you but you hadn't
 25 actually met him in person up to this day?

18

1 A. Yes, yes. We'd spoke on the phone and emailed
 2 et cetera, but we'd never met.
 3 Q. You were taking this opportunity to speak with him. We
 4 don't need to go into the details of what.
 5 A. Yes.
 6 Q. But you were in that area, I think, at a time when the
 7 afternoon sessions after a short break were about to get
 8 underway?
 9 A. Yes.
 10 Q. As you were standing there on that balcony, did you hear
 11 or see anything from elsewhere which caught your
 12 attention?
 13 A. There was just sudden, like, shouting, like screams and
 14 stuff.
 15 Q. Where was that coming from?
 16 A. From downstairs, it was obviously right below us, but,
 17 like I say, we didn't realise if it was people just
 18 messing about at first, because it wasn't really that —
 19 well, I'd say the next lot of screams got a lot more
 20 guttural, it was a lot clearer something was going on.
 21 Q. So you heard one set of shouts or screams which made you
 22 think initially that somebody was messing around, and
 23 then there was a second set of screams that was more
 24 concerning?
 25 A. Yes.

19

1 Q. Could you tell anything about the screams, what sort of
 2 person was screaming, or whether it was in pain or fear?
 3 A. No, like I say, you couldn't distinguish whether it was
 4 male or female, it just seemed a mix of each, like there
 5 was a few people screaming, shouting, crying.
 6 Q. Did you look over the railing to see what was going on?
 7 A. I think I did peek over, yes. There was nothing —
 8 we couldn't see nothing from that vantage point, so we
 9 just immediately went down the left side.
 10 Q. You went down the left staircase to the reception area?
 11 A. Yes.
 12 Q. What was Mr Evans doing?
 13 A. I thought he'd come down with me down the same set of
 14 stairs but...
 15 Q. As you reached a point a little further down the stairs
 16 could you see more of what was going on downstairs?
 17 A. Not really, it was only like when we got to the bottom,
 18 the middle bit of the stairs, the flat bit, that you
 19 could actually see Saskia pretty clearly, and just as we
 20 started going down past Saskia, Usman Khan.
 21 Q. If we could just put on screen another photograph,
 22 {PH0050/152}, we can see a view up the stairs from the
 23 bottom, you tell us you had reached the flat part where
 24 the two branches of the staircase meet, near the statue,
 25 and you looked down and you saw Saskia. Where was

20

1 Saskia?
 2 A. Saskia seemed to be about four or five stairs from the
 3 top of that bottom flight.
 4 Q. How was she positioned?
 5 A. She had her head near to the top of the stairs and her
 6 feet was like -- she was laying like across three or
 7 four stairs with her feet pointing to the bottom of the
 8 stairs.
 9 Q. What could you tell about her immediately?
 10 A. Just she was obviously bleeding and in a lot of pain,
 11 and yes, in a lot of trouble.
 12 Q. Where was Mr Evans now and what was he doing?
 13 A. He was right -- I followed -- he was right beside me as
 14 we both got to Saskia.
 15 Q. Now you say you saw Usman, Usman Khan?
 16 A. Yes.
 17 Q. Where was he?
 18 A. He was just like on the flat bit, I think -- no, he was
 19 just off the marble bit on the very bottom piece,
 20 I think, or maybe just on the steps, the first two
 21 steps, just around there somewhere.
 22 Q. So he was around the area of the steps leading down from
 23 the black marble area at the bottom of the main
 24 staircase, or possibly just at the bottom of --
 25 A. In between the pillars, like in between both sets of

21

1 pillars, I think, somewhere there.
 2 Q. What did you notice immediately about him?
 3 A. Just obviously he had two big knives, that was apparent
 4 straightaway, there's no missing them, so yes, I've just
 5 seen the two knives first, and he was shouting and
 6 screaming.
 7 Q. Could you tell what he was shouting or screaming?
 8 A. No, I couldn't distinguish it, no.
 9 Q. In your witness statement -- and for the lawyers
 10 I'm looking at page 6 -- you say:
 11 "... I saw Usman stood there with two fucking big
 12 knives, shouting and jumping about like a loon. He was
 13 going nuts. He was shouting 'Allah Akbar'."
 14 A. I don't think he shouted "Allah" at that time, I think
 15 he was speaking Arabic, but as I got closer to him
 16 I started a bit of a dialogue with him, or tried to just
 17 engage him, and it was in response to me talking to him
 18 he started shouting "Allah Akbar" and other stuff.
 19 Q. Okay. We'll get to the dialogue in a moment. You say
 20 that he was going nuts. Was he standing still? Was he
 21 moving towards you or away from you?
 22 A. He seemed to be stood, like, still, just in like two
 23 minds, trying to decide which way to go or who to attack
 24 or, I guess he was -- because me and Gareth come down,
 25 he had other things to think about, I think, so he was

22

1 just like ... I don't know.
 2 Q. You say that he was speaking in Arabic. You could tell
 3 it was Arabic?
 4 A. I don't know if it's Arabic, I just know it was foreign,
 5 like, a foreign language.
 6 Q. What did you do in response to this sight?
 7 A. Obviously as I get to Saskia there's a lot of things
 8 going on, I think. Things just seemed to slow right
 9 down for me.
 10 Q. Take your time and if you need a break, tell us.
 11 A. No, it's just I had to just walk past Saskia, because
 12 obviously there was still danger there, so, yes, I just
 13 carried on to Khan.
 14 Q. In your statement you tell us that Mr Evans went to
 15 Saskia as you went forward to the danger?
 16 A. Yes. When he like dropped down to Saskia, I felt
 17 comfortable going on then, but yes, he stopped.
 18 Q. Now, as you got closer to Usman, could you tell anything
 19 more about his appearance?
 20 A. Just that he had a coat on, and then as I got closer to
 21 him, I could see the belt as well. The belt was pretty
 22 clear as well.
 23 Q. So you could see a belt around his midriff was that?
 24 A. Yes.
 25 Q. What did it look like?

23

1 A. It just looked like a black, like, a bodybuilder's belt
 2 with, like, bits stuck to it, bits of wire and bits of
 3 silver, and it just looked like it had a bit of
 4 a contraption, but it was pretty obvious what it was.
 5 Q. Just pause there. It may be obvious to you, it may be
 6 obvious to many of us; what did you think it was when
 7 you first saw it?
 8 A. I just obviously instantly, like I say, being in prison
 9 with them for a few -- I just instantly knew what he
 10 was -- it was a terrorist attack and that was a suicide
 11 belt.
 12 Q. In that moment, and it's obviously difficult thinking
 13 back, but in that moment did you think it was a real
 14 suicide vest?
 15 A. I really didn't think about it, because at the same time
 16 there was Lisa was, like, to the right pillar, walking
 17 towards Khan, like in a trance.
 18 Q. You were saying a moment ago you had an exchange with
 19 him, you exchanged words with him. Was this the point
 20 at which you did that?
 21 A. Yes, I was just trying to distract him.
 22 Q. As far as you can remember, what did you say to him and
 23 what response did you get?
 24 A. I just started like shouting "What the fuck are you
 25 doing? What's going on?"

24

1 Q. What did he say?
 2 A. He said "I'm going to kill yous all, you're all fucking
 3 dead" and all this, then "Allah Akbar" and stuff.
 4 Q. So you said, "What the fuck are you doing?" He said
 5 "I'm going to kill you all?"
 6 A. "I'm going to kill yous all."
 7 Q. Could you see anyone else around at this time?
 8 A. Just Lisa.
 9 Q. Lisa Ghiggini?
 10 A. Yes.
 11 Q. Where was she, from your perspective?
 12 A. She was to the right, behind, say, the right pillars on
 13 the flat bit, about 4 metres from Khan, walking in his
 14 direction.
 15 Q. So walking towards him and therefore in danger.
 16 A. I think she was trying to reason with him, like I was
 17 but ...
 18 Q. Did you say anything to her?
 19 A. I just told her to get out the way, move, it was like
 20 she wasn't hearing anything, she was in a trance.
 21 Q. Could you see anyone else around at that time dealing
 22 with the situation?
 23 A. Not that I was aware of, no. I may be wrong, but it
 24 just seemed like for a while I was on my own.
 25 Q. At this point in your statement, and I just want to be

25

1 clear about what you remember when, at this point in
 2 your statement you say that you saw somebody run in with
 3 a stick and thinking that that person was lucky to have
 4 a weapon?
 5 A. Yes, I read that, that's what I've read in the statement
 6 and that's the one thing I've confused myself with,
 7 because for a while it seemed like I was on my own, for
 8 ages.
 9 Q. So now looking back and thinking, you don't think you
 10 saw a person with a weapon?
 11 A. Yes, I definitely didn't see anyone with a tusk until
 12 right at the very end, until he was only going out the
 13 door.
 14 Q. Did you then have another exchange with Usman Khan?
 15 A. I did, yes. I brought the belt up. I just -- I don't
 16 know, I was just trying to call his bluff. I've got out
 17 of a few sticky situations in the past just bluffing it,
 18 that's all, I was just telling him what -- just shouting
 19 at him really "What the fuck's that round your waist,
 20 that supposed to be a suicide belt?" Just hoping it was
 21 fake, but ...
 22 Q. So you said something about a suicide vest, hoping it
 23 was fake, trying to call his bluff?
 24 A. Yes, yes. I was trying to engage him really while I got
 25 Lisa out the way, but he started shouting about -- and

26

1 then he said -- he started saying things like "Yeah,
 2 I'm going to blow yous all up", and I started saying
 3 "Well, blow it then", and that's when he said,
 4 "I'm waiting for the police", I said, "What are you on
 5 about waiting for the police?"
 6 Q. The way you have recounted this in your statement,
 7 I'm just going to read it out to see if you agree with
 8 it or would like to change anything about it. You say
 9 in your statement that the exchange went like this. You
 10 said: what the fuck you got there? Usman said:
 11 "I'm going to blow you up". You responded: "it's
 12 fucking fake, blow it". He then said the words:
 13 "I'm waiting for the police". And you then said: "what
 14 are you talking about, waiting for the police?"
 15 A. That's more like it, yes.
 16 Q. So thinking back and remembering that you wrote this
 17 statement much closer to the events, is that --
 18 A. I may just get the actual sentence wrong, but hopefully
 19 the principle is right.
 20 Q. Is it fair to summarise it in this way: that you
 21 remember now that you had an exchange with him about the
 22 belt, trying to call his bluff, hoping that it was
 23 a fake; yes? That he threatened to blow everyone up and
 24 he said he was waiting for the police?
 25 A. Yes.

27

1 Q. Throughout all this time, were you standing at the
 2 bottom of the steps with him near the pillars, perhaps
 3 a few metres away?
 4 A. You know at this point it was just -- it was just -- it
 5 just went nuts. I don't know. I say it was a bit
 6 like -- obviously it's a lot more serious, but it was
 7 a bit like Benny Hill. I was just running around trying
 8 to distract him, trying to stay out of the way of the
 9 blades, because he kept coming for me, I kept like --
 10 when I picked something up I would go for him. First
 11 I got Lisa out the way and pushed her up the stairs. So
 12 then he's come for me when I done that, so I had -- it
 13 was just all over the place round there. And there was
 14 a lectern on the side, I picked that up, on the marble
 15 piece to the left.
 16 Q. So you were running from side to side trying to distract
 17 him. You had got Lisa successfully out of the way up
 18 the stairs, and you then went for a lectern which was
 19 positioned towards the left-hand side of the photograph
 20 we're looking at?
 21 A. Yes.
 22 Q. What did you do with the lectern?
 23 A. I was waving at him at first because it was big, it was
 24 heavy, I was just trying to wave it at him to keep him
 25 away, but then I just threw it at him and it bounced off

28

1 him and split.
 2 Q. So you made contact by throwing the lectern at him, did
 3 you?
 4 A. It just like bounced off him.
 5 Q. How did he react?
 6 A. Every time I done something like that, he would — as
 7 soon as I let go of it he would come for me with the
 8 knives, so I would have to back up a bit again.
 9 Q. Were you aware of anyone near you also confronting him?
 10 A. I'm not aware of anyone at this time though still.
 11 There might have been, but I don't know.
 12 Q. Did you find anything else to use against him?
 13 A. Well, no, that went on for a few seconds, and then as
 14 I was thinking — because obviously every time I've got
 15 nothing in my hands, he's coming for me, so I'm backing
 16 up so I'm thinking what else can I use. It's at this
 17 point when I'm backing up, he's turned around and gone
 18 running back to Izzy.
 19 Q. Where then did he go?
 20 A. Out of sight, down this way to the entrance way, the
 21 reception room.
 22 Q. Let's try another couple of photographs, {PH0050/65}.
 23 Now, this is looking down the corridor with the
 24 staircase on the right. Are you telling us that he
 25 moved across this corridor. It would be from right to

29

1 left as we're looking at it?
 2 A. Yes. Yes, from right to left into the reception room,
 3 yes, through the fire doors.
 4 Q. Then if we look at page {PH0050/151}, we have there the
 5 opposite view, looking down the corridor with the
 6 staircase on the left. You would have been, I think,
 7 just to the left, and you're describing Khan moving away
 8 from you, across this corridor, left to right?
 9 A. Yes.
 10 Q. Could you see where he went?
 11 A. Yes, them doors was open, it is just like directly in
 12 front of you. I could see Izzy when I was on the
 13 stairs. I didn't know it was Izzy, I could just see
 14 someone curled up. You could see straight through the
 15 doors into the reception room.
 16 Q. So he moved through the open doors towards the entrance
 17 foyer, did he, the room that you enter when you first go
 18 in the building?
 19 A. Yes.
 20 Q. Were you aware of anyone else being in that entrance
 21 hall?
 22 A. Yes, I think there was other people round there, yes.
 23 I'm not sure who. I had my eyes on him because he
 24 was — he had a few yards on me and it was clear what he
 25 was going to do.

30

1 Q. What was he going to do?
 2 A. He was going back to stab Izzy again.
 3 Q. Could you tell where Izzy was?
 4 A. She was like in the right-hand corner, the far corner.
 5 Q. So from your position, having been engaged with Usman,
 6 you see him move away towards the entrance hall, which
 7 is on the — opposite you across the corridor, and
 8 you're aware that Izzy Rowbotham is lying in that
 9 area —
 10 A. I don't know it's Izzy, I just know there's someone
 11 lying there.
 12 Q. You can see somebody lying there, and you can see what
 13 you think is Usman Khan or what you know is Usman Khan
 14 but you think he is heading towards that person?
 15 A. Yes, there was no — if he was going to the door he
 16 would have gone left. There's only one place he could
 17 have been going.
 18 Q. So as he approached the figure on the floor in the
 19 entrance hall, what did he do?
 20 A. He just started sticking the knife in her again.
 21 Q. Did you know that this person lying on the floor of the
 22 entrance hall had been injured?
 23 A. Yes.
 24 Q. So you knew that he was going to injure this person who
 25 was already injured?

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1 A. It just seemed to me, like I say everything — I don't
 2 know for everyone else, but for me everything slowed
 3 down, it just seemed like he knew he wasn't getting up
 4 the stairs, I think he was trying to get up the stairs,
 5 he knew he wasn't getting up the stairs so he just went
 6 to try and get whoever else he could pick off
 7 downstairs, I think.
 8 Q. How many times did he stab the figure on the floor, as
 9 far as you could see?
 10 A. Twice. I hit him with a chair before he got the third
 11 one.
 12 Q. Was he saying anything as he was stabbing?
 13 A. I don't know.
 14 Q. In your statement, this is the middle of page 7 for the
 15 lawyers, you say that he was stabbing with his right
 16 hand and he said "Allah Akbar" when he stabbed. Is that
 17 a detail you remember now?
 18 A. I'm not sure about — if I said it, yes, it would have
 19 been — he was shouting a lot, "Allah, Allah", all of
 20 the time.
 21 Q. And you say that you engage with him again with a chair
 22 at this point?
 23 A. Yes. Well, I know where he's going so I'm running,
 24 I don't know what I'm going to do, so I'm just chasing
 25 after him, and I just happened to see a big, like,

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1 ornamental chair.
 2 Q. Where did you get the chair from?
 3 A. I don't know, it was just to the right, I think, I don't
 4 know, I just picked -- there was just a chair.
 5 Q. You say you took the chair and you used it against him.
 6 How did you use it against him? What motion did you
 7 make?
 8 A. I literally just picked it up and swung it at him.
 9 Q. Did you make contact?
 10 A. Yes.
 11 Q. Did it seem to have an effect?
 12 A. It definitely knocked him across the room, but, like,
 13 again, he just seemed to -- probably adrenaline.
 14 Q. What did he then do?
 15 A. He then went round the other door, back into the
 16 corridor, and I think there was people there starting to
 17 get involved, because that then allowed -- then I went
 18 looking for something down -- I got the fire
 19 extinguisher right at the bottom of the corridor.
 20 Q. You headed back into the corridor that we see on the
 21 screen, did you?
 22 A. Well, he went back into the corridor through the
 23 opposite door, and I went through after him, and it was
 24 clear there was other people there then, which I felt
 25 safer to go on to find something else more substantial.

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1 Q. How many other people were confronting him --
 2 A. Two or three, I think.
 3 Q. -- to make you feel safe to go elsewhere?
 4 A. I'm not sure, it's -- like a blur of bodies, it's just
 5 all a blur, but there was two or three, I think, bodies
 6 about.
 7 Q. You went then looking for a weapon, did you?
 8 A. For anything, yes.
 9 Q. Where did you find the fire extinguisher you just
 10 mentioned?
 11 A. It's right at the bottom of that corridor, at the other
 12 end I think it is, on the left-hand side.
 13 Q. So near the position of the person taking the photograph
 14 in this photograph?
 15 A. Yes. Probably the same length again down the other way.
 16 Q. Having armed yourself with that fire extinguisher, where
 17 did you then go?
 18 A. Pardon?
 19 Q. Where did you go after arming yourself with the fire
 20 extinguisher?
 21 A. Straight back up to the reception area to find Khan.
 22 Q. Was Khan in the entrance hall by this point?
 23 A. I think I first sprayed him in the corridor, like
 24 outside the two doors into the reception room.
 25 Q. So he was in the area of the doors to the reception

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1 room. What do you do to deal with him at that point?
 2 A. I just sprayed him with him and it just really sort of
 3 like seemed to have an effect on him, sort of like
 4 blinded him. He seemed to really start struggling, like
 5 from the foam and stuff.
 6 Q. Did it cause him to move anywhere?
 7 A. Then he just come running through the foam with the
 8 knives, so I'd have to back off again, and then spray
 9 him again.
 10 Q. Were you aware of what anyone else was doing around you
 11 to engage with him at that point?
 12 A. Not a clue. As I say, I was just focused on him.
 13 Q. Now in your statement the way you describe it is that
 14 you were spraying the extinguisher at him, it was
 15 driving him slowing towards the doors through the
 16 entrance hall, there was somebody else there with
 17 something that resembled a long horn or stick?
 18 A. Spike, yes.
 19 Q. Striking at him; is that something you remember now?
 20 A. Yes.
 21 Q. And you describe in your statement that he kept coming
 22 at you as you were spraying at him; is that right?
 23 A. Yes.
 24 Q. Did he, though, back up through the entrance hall
 25 towards the main doors as you and the other person were

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1 confronting him?
 2 A. Yes. He was just mad to get out then, he just started
 3 threatening people to let him out.
 4 Q. So he managed to get out by the main doors. Did you see
 5 how he got out, given that the doors were usually
 6 locked?
 7 A. No, I didn't see, no.
 8 Q. When you became aware that he had managed to leave the
 9 building, what did you do?
 10 A. I went straight out after him.
 11 Q. Why did you pursue him?
 12 A. I know Steve went out first, I just thought I'd better
 13 back Steve up, and maybe he's going to hurt people
 14 outside.
 15 Q. So Mr Gallant was on the scene now?
 16 A. Yes.
 17 Q. Had you seen him before during the engagement?
 18 A. Not that I remember, no.
 19 Q. He went out after Khan first, and you decided to back
 20 him up?
 21 A. Yes.
 22 Q. Could we put on screen {DC7421/31}. We can see here the
 23 steps down to Fishmongers' Hall, down from
 24 Fishmongers' Hall. What did you do when you got to the
 25 top of these steps?

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1 A. I just thought I went down, straight down the steps
 2 after Khan.
 3 Q. So you went after Khan. What else did you do?
 4 A. As he started running up the bridge, it was very clear
 5 that there was people coming down the other end, so
 6 I was just screaming "He's got a bomb, get back!" sort
 7 of thing.
 8 Q. We can see on this photograph that you sprayed him, or
 9 sprayed at him, as you came down the steps; is that
 10 right?
 11 A. Yes.
 12 Q. And you say that you went after him, shouting at members
 13 of the public to get away.
 14 A. About 20 yards up the bridge there was obviously people
 15 coming the other way, getting pretty close so I just
 16 started screaming to get back.
 17 Q. As he was getting close to people or people were getting
 18 close to him, was Khan doing anything?
 19 A. No, he just kept turning round, trying to like scare us
 20 off, I guess he was trying to do that all the time, but
 21 no, he was trying to, like -- I think he knew he was in
 22 trouble then, I think he was wanting to get away then,
 23 so he kept looking back to see if we was coming, and he
 24 started running and turned back.
 25 Q. So you thought his principal concern was with you and

1 the other people going after him?
 2 A. Yes, I think he just wanted to get away now.
 3 Q. How far did you get following him?
 4 A. How far did I get what, sorry?
 5 Q. How far did you get following him? How far did you go?
 6 A. I think about 50, 60 metres up the road.
 7 Q. Who was with you at that point?
 8 A. Darryn and Steve.
 9 Q. So you were with Darryn Frost and Steve Gallant; how
 10 close were they to you?
 11 A. There was, like, a couple of feet between us.
 12 Q. You were alongside the two of them running after Khan?
 13 A. Yes.
 14 Q. And he was running away, looking back from time to time?
 15 A. Yes, well, he would look back and try and, like, stab
 16 one of us and then run off again. So the three of us
 17 would be swapping places, obviously it was very fluid.
 18 Q. What caused you to stop? What led to the confrontation
 19 coming to a halt?
 20 A. I don't know. It must have been him just deciding to
 21 face us, because I -- I know when he did turn round this
 22 time and I sprayed him he actually hit the hose and just
 23 missed my hand, just kept coming through, and then
 24 I think luckily Darryn hit him with the spike and he
 25 lost his balance.

1 Q. If we put on screen the next page of this compilation,
 2 {DC7421/32}. Can we see there the moment that Darryn
 3 struck him that you're describing?
 4 A. Yes.
 5 Q. We see you with the fire extinguisher spraying at the
 6 time; yes? And we see Mr Gallant to your right.
 7 A. Yes.
 8 Q. What was the effect on Khan of the stick being thrust at
 9 him?
 10 A. It just seemed to knock him off balance, he seemed to
 11 just lose his balance.
 12 Q. Did he fall?
 13 A. Yes, well, I think he was on his way and then Steve,
 14 like, one-handed, whatever you call it, with his arm,
 15 just put him down.
 16 Q. So as he was off balance, Steven Gallant went for him,
 17 tackled him and brought him down?
 18 A. Yes.
 19 Q. Mr Gallant, of course, was unarmed at this point,
 20 tackling an armed man?
 21 A. Yes.
 22 Q. Did you do anything at that point to assist the others?
 23 A. Yes, just -- it just seems like we're a bit distant
 24 there, it just seems that we were all very close
 25 together, and it all just -- it seems like Darryn has

1 poked him there, I don't know if that's the only time he
 2 poked him, but it seemed like Steve was right at the
 3 side of him when he lost his balance and just hit him
 4 with his arm, and we was all just on him simultaneously,
 5 it felt like.
 6 Q. So you all seemed to go for him simultaneously, is that
 7 what you're saying?
 8 A. Yes.
 9 Q. As you grappled with him, what did you do to bring him
 10 under control; what movements were you making?
 11 A. Initially I've hit him with the extinguisher in the
 12 head, I think I just clipped his head. This guy was
 13 trying to kill us. And then when we got to the floor,
 14 I think I hit him in the hand with the extinguisher.
 15 I immediately let go of the extinguisher and grabbed his
 16 hands and tried to wrestle the knife off him, and then
 17 I turned the knife around when I took it off him and
 18 I've hit him the temple with the handle side.
 19 Q. So you hit him on the head with the extinguisher first,
 20 then you used the extinguisher to hit his hands to get
 21 the knives away?
 22 A. Yes.
 23 Q. You think you were successful in getting one of the
 24 knives away?
 25 A. Me?

1 Q. Yes, were you?
 2 A. Yes, definitely, yes.
 3 Q. And that you then say you struck him with the butt of
 4 the knife on his temple?
 5 A. Yes.
 6 Q. Through all this, did you feel that you, Mr Frost and
 7 Mr Gallant were getting him under control, bringing him
 8 to a halt?
 9 A. Definitely, yes.
 10 Q. After a short time did you become aware of police
 11 arriving?
 12 A. Yes, very quickly, yes.
 13 Q. Where did they seem to be coming from?
 14 A. The other side of the road. They seemed to pull up,
 15 like, level with us on the other side of the road and
 16 jumped the barricades.
 17 Q. Could you hear them saying anything at that point?
 18 A. I think they were just telling us to get back and get
 19 off him, I think.
 20 Q. You were physically grappling with him at this time, you
 21 were part of a melee with him. The police were arriving
 22 and they were shouting for you to get off, were they?
 23 A. Yes.
 24 Q. How did you react to that request or command?
 25 A. Well, armed police, I got off quick.

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1 Q. Were you saying anything to the police?
 2 A. Yes, I was telling them to shoot the bastard.
 3 Q. Did the others also get off him?
 4 A. Yes, obviously Darryn was the last and had to be pulled
 5 off.
 6 Q. Darryn Frost was the last on him but he also got up or
 7 was moved away, was he?
 8 A. Yes.
 9 Q. At that point what did the officers do?
 10 A. They was shouting at him to stand still and as I say,
 11 I was telling them "He's just killed people, he's got
 12 a bomb, just shoot him." It seemed like an age. They
 13 didn't just go over and hurry; they seemed to, like,
 14 give him a chance, and obviously the taser went and the
 15 gun. I thought that was him at that time, I thought he
 16 was dead.
 17 Q. So just to recap slightly, you were shouting at the
 18 officers to shoot him, you were also shouting that he
 19 had a bomb.
 20 A. Yes.
 21 Q. Is that because you thought it was a bomb or because you
 22 thought that the suicide vest might be a bomb?
 23 A. I just didn't know if it was a bomb. If it was a bomb
 24 there's not much I could do, but I didn't know. Just as
 25 long as he didn't blow it. I don't know. It all

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1 happened so quick.
 2 Q. You say you were aware of something being fired?
 3 A. Yes.
 4 Q. How long was that after you had moved away?
 5 A. Like I say, it seemed an age for me, but it was probably
 6 no more than 10 seconds.
 7 Q. What was fired at Khan?
 8 A. A taser, and a gun shortly afterwards. He was still
 9 moving. They fired the taser, I think they was telling
 10 him to stay still, but obviously when you're tasered --
 11 I thought it is a bit unusual because you convulse,
 12 apparently, I think. But they waited a time and he kept
 13 moving and they shot him.
 14 Q. You were aware of the taser being fired first and then
 15 a gunshot?
 16 A. Yes.
 17 Q. You were aware of Khan moving in convulsions in response
 18 to the taser?
 19 A. Yes, just like little flinches, yes.
 20 Q. Overall, what was your impression of how the officers
 21 conducted themselves, how they dealt with Khan?
 22 A. I don't think there's anything they could have done
 23 better. Like I say, they give him an opportunity to
 24 stop, to comply with their things. As I say, I was
 25 telling them to get on with it.

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1 Q. In your statement you say that they seemed to take their
 2 time and they "weren't gung ho". What did you mean by
 3 that?
 4 A. Like I say, it seemed like an age, like I was just
 5 screaming at them to shoot him. It seemed like it took
 6 ages, like, they give him plenty of time, I don't know.
 7 Q. You also said that Khan had the opportunity to respond
 8 to the officers' commands or to do something in response
 9 to what the officers were saying?
 10 A. They were just telling him to stay still, he could have
 11 just stayed still, yes, he seemed to move to get up.
 12 Q. Did that happen before the taser and the shots were
 13 fired?
 14 A. Yes.
 15 Q. After the taser and the shots were fired, did you stay
 16 at the scene or did you move away?
 17 A. We was all took away, told to evacuate the road, get
 18 back in the building.
 19 Q. You got back into Fishmongers' Hall and shortly after
 20 that were you evacuated from the hall?
 21 A. Yes.
 22 MR HOUGH: Those are the questions that I have for you.
 23 I'll just look to see, I think we have some questions
 24 from others.

Questions by MR ARMSTRONG

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1 MR ARMSTRONG: Thank you, sir.
 2 Mr Crilly, my name is Nick Armstrong and I represent
 3 Jack's family. I'm not going to ask you any questions
 4 about the attack and your response to it, but I do want
 5 to acknowledge it, because that was astonishingly brave,
 6 I want to say that on behalf of the family.
 7 What I want to ask you about is something earlier
 8 than this. You, as I understand it -- I don't want to
 9 go into the detail of this -- but your background in the
 10 criminal justice system is relevant to something. You
 11 had an appeal against conviction succeed in 2018, didn't
 12 you?
 13 A. Yes.
 14 Q. But by then you had done, I think, about 13 years in
 15 custody?
 16 A. Yes.
 17 Q. By then, towards the end of your sentence, when you
 18 encountered Learning Together, you were in HMP Grendon.
 19 A. Yes.
 20 Q. But I think you said in response to a question from my
 21 learned friend Mr Hough, that you had had experience of
 22 dispersal prisons?
 23 A. Yes.
 24 Q. Now, dispersal prisons, for the jury in particular, are
 25 high security prisons and they are called that because

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1 people are dispersed around them, people are kept moving
 2 when they are high security risks, aren't they?
 3 A. Yes.
 4 Q. Would you mind just telling us what dispersal prisons
 5 you knew?
 6 A. Which prisons I knew?
 7 Q. Where had you been in the dispersal (inaudible)?
 8 A. Frankland and Full Sutton.
 9 Q. Which are both category A dispersal prisons?
 10 A. Yes.
 11 Q. Thank you. Now I just want -- it may be completely
 12 obvious and we have heard this from somebody else, but
 13 HMP Grendon, where you were when you encountered
 14 Learning Together, is a completely different prison to
 15 the high security estate?
 16 A. Yes, there's not even a segregation in there.
 17 Q. Not even a segregation. Very little in the way of
 18 adjudications?
 19 A. Yes, they don't have them.
 20 Q. You're smiling because the point I'm making is obvious.
 21 A. They don't have them. The lads decide what happens.
 22 It's more run with the lads' decisions than the
 23 officers'.
 24 Q. I think what you're describing is the democratic nature
 25 of a therapeutic community where the prisoners have more

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1 say in the regime?
 2 A. Yes.
 3 Q. And the reason why I'm asking you about that is simply
 4 that it takes you some time to get there, you have to
 5 work your way down the system?
 6 A. Mm.
 7 Q. And you have to jump through hoops in order to get to
 8 somewhere like Grendon, including being settled and
 9 committed to a therapeutic process?
 10 A. Yes.
 11 MR ARMSTRONG: Yes. Thank you very much indeed. That's all
 12 I wanted to ask.
 13 Questions by MR RULE
 14 MR RULE: Sir, as you know, I represent the family of Saskia
 15 Jones, and assist Mr Pitchers QC whom the jury are more
 16 familiar with seeing ask questions of witnesses.
 17 JUDGE LUCRAFT: Yes, thank you.
 18 MR RULE: Mr Crilly, you heard my explanation as to who I am
 19 and who I am asking questions on behalf of, all right,
 20 and I echo, if I may, the commendation for the lives
 21 that you saved that day with your bravery.
 22 So far as your prison experience was concerned, you
 23 spent 13 years in the therapeutic community you were
 24 just mentioning at Grendon, where you would have been
 25 selected, passed an induction, and remained a part of

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1 that democratic society, behaving yourself appropriately
 2 to remain there?
 3 A. I was in there for five years.
 4 Q. Five years. And within the prison system more
 5 generally, there are education opportunities of which
 6 you took advantage?
 7 A. Yes.
 8 Q. And that's including basic training, that can be GCSE,
 9 O level type of material, it can be vocational training,
 10 and it can even be at degree level, and you yourself
 11 undertook an Open University law degree, graduating in
 12 2018?
 13 A. Yes.
 14 Q. So it's right to say that so far as you and your
 15 experience of prison, you took the opportunities for
 16 rehabilitation, and you behaved yourself in a way
 17 appropriate to maximising your chances of success in the
 18 outside world.
 19 A. Yes.
 20 Q. Within that you were selected for one of the few places
 21 on the Learning Together programme that was run inside
 22 the prison, and those events there, including when you
 23 pass out of that course, they all happen inside the
 24 prison security environment?
 25 A. Yes.

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1 Q. Now, I would then like to speak about you having been
2 released. Now, we've heard your conviction was quashed
3 as a wrongful conviction, and that was to do with joint
4 enterprise. In brief, it means that you were held
5 responsible for what someone else had done, of a very
6 violate nature, but it wasn't you who had done it and
7 the law has been amended and as a result you were freed
8 from that conviction.
9 A. Yes.
10 Q. With your release, you were helped by Learning Together
11 to obtain a job pot—washing, 15 hours per week, at
12 St John's College at the time?
13 A. Yes.
14 Q. And this is going back to your statement and events
15 around November 2019.
16 A. Yes.
17 Q. You had also separately been given a mentor, Judge
18 Samuels, whom the jury have heard evidence from.
19 A. Yes.
20 Q. That was through something called the Longford Trust,
21 wasn't it?
22 A. Yes.
23 Q. So there's a variety of organisations that prisoners are
24 assisted by trying to help those who are helping
25 themselves?

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1 A. Definitely, yes.
2 Q. And you have explained about meeting him in your
3 evidence to Mr Hough. So far as the event is concerned
4 on 29 November, I'm not going to go into any details,
5 but just the attendance of it. You have mentioned in
6 your statement that you felt somewhat obliged to attend,
7 you were in two minds about it, and you had from your
8 time in prison with Learning Together received some, as
9 you have told us earlier, hope and purpose, coming from
10 that as well as the other things you were doing.
11 But by the time we get to November and you are in
12 the community, in your witness statement you go on to
13 speak about your feelings at that particular time, and
14 for the lawyers I'm at page 5 of your witness statement.
15 During the course of the event, you had been a bit
16 in two minds about being there, you had gone out and got
17 yourself a sandwich, I think, you had left the building
18 for a while, but you felt you ought to go back and show
19 your face. And when you were there, you then had the
20 opportunity to speak to Judge Samuels for the first
21 time, having met him that day, and you and Gareth both
22 wanted to speak to him and you wanted some privacy for
23 that conversation, so you didn't do it sat at a table in
24 the main event?
25 A. Yes.

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1 Q. You went outside to the landing, where we've heard
2 events began, but I'm only asking you about the
3 conversation before events. So during that
4 conversation, this is what your witness statement
5 explained:
6 "Me and Gareth have been quite disheartened about LT
7 [that's Learning Together] and we wanted to talk to him
8 about the course and LT [this is to Judge Samuels]."
9 So the word you used was "disheartened" and:
10 "[You] talked about the course, the support from LT
11 and where we wanted to go into the future."
12 Now, you were speaking for a few minutes, I don't
13 need to ask you the details of that conversation, all
14 right, but if we just take what it really was about, or
15 the meaning of it, you had been given this hope from
16 attending the course inside the prison; outside you had
17 been able, having completed a law degree and other
18 things, you were able to get a 15-hour per week
19 pot—washing job, and you had felt disheartened about the
20 programme and the support available, and so you had felt
21 that that was sufficient to both raise with
22 Judge Samuels, your mentor, who is not from
23 Learning Together, but from another organisation, and
24 you felt it appropriate to mention it to the police in
25 the statement that you gave.

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1 A. Yes.
2 Q. And so was that relating to, really, the hopes that
3 might be built up inside the prison, but the
4 difficulties of that being realised, or the lack of
5 support for that outside the prison?
6 A. Yes, I think with — this is pretty complex, and I want
7 to get this right because it's important, but
8 Learning Together do an amazing thing in prison. When
9 me and Gareth got out and got together, we was
10 expecting, like, to go into relevant similar jobs.
11 I know Gareth starting working for them for a while, and
12 we just — I think it was more our expectations, and
13 I may be being a slapped arse little shit, as my mum
14 used to say, sorry, but I think it was more on us than
15 what they was offering. I think we... yes.
16 Q. Yes, you had been studying —
17 A. They could, if they had more, like, it was just things
18 like maybe better signposting to actual jobs or just
19 semantics, it's just really what they do, I don't want
20 anything to take away from what they do, because what
21 they do is amazing, it was just probably me being —
22 wanting more than they could give.
23 Q. I understand that. It was certainly geared up inside
24 the prison, you had the students attending, you had the
25 events inside the prison system, but afterwards, there

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1 was, perhaps, a little bit less available than you'd
 2 hoped for?
 3 A. Because, like, they got me a job in the kitchens serving
 4 food, there was potentially a gardening job, so there
 5 was really help. I think it was just more on me
 6 expecting too much.
 7 Q. Thank you. One last topic I would like to just ask you
 8 about, please. Today you have told us about your
 9 knowledge of terrorist prisoners from the prison system,
 10 your experience of that, and you knew the words "Allah
 11 Akbar" in the event itself, and I gather that you had
 12 heard those words being misused by terrorist offenders
 13 inside prison.
 14 A. Yes.
 15 Q. So you were familiar with what that really meant?
 16 A. I've been — they tried to convert me a few times in
 17 prison. I've seen what they do. They whip each other,
 18 they throw fat(?) on people, it's horrendous. They
 19 literally run every dispersal in the country.
 20 Q. So when you say running the prisons, running the
 21 dispersal, let me just break it down, because the jury
 22 might just want to understand a bit about what terrorist
 23 offenders, your experience of them is. I'm not going to
 24 ask very long, just a few more questions, please.
 25 So inside the prison you have the group of terrorist

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1 offenders within whom they essentially form a gang,
 2 don't they, in these prisons?
 3 A. Yes.
 4 Q. And you are either in the gang or you are not, so they
 5 try and convert people, they try and encourage people to
 6 their way of belief?
 7 A. They just want numbers. They go to the extent of —
 8 I had an experience in prison before that they will
 9 allow sex offenders, off sex offenders wings to come
 10 onto the main wings as long as they convert, so they'll
 11 forgive anything just to get numbers.
 12 Q. And sex offenders are picked on there, presumably,
 13 because they are often subject to violence because of
 14 the dislike of their offences?
 15 A. I don't know why they pick them.
 16 Q. But in terms of running it, in terms of this gang
 17 operation inside the prison, this is enforced by
 18 violence and threats, isn't it?
 19 A. Yes.
 20 Q. So if you don't toe their line and join their beliefs,
 21 then you can be punished by physical violence or
 22 threats?
 23 A. Yes.
 24 Q. And within the gangs themselves there are also
 25 hierarchies, aren't there, there are those who pull the

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1 strings?
 2 A. Yes, definitely.
 3 Q. And is it your understanding that generally the prisons
 4 know who that is?
 5 A. Yes.
 6 Q. Behind the scenes, they know who is causing the trouble?
 7 A. Definitely. The prison staff?
 8 Q. Yes.
 9 A. 110%, yes.
 10 Q. It's not a surprise, you as a prisoner there, who it is
 11 that is running the Muslim gang or the terrorist gang
 12 that is causing the mischief?
 13 A. It was very interesting, there was a security governor
 14 of Whitemoor at the event as well.
 15 Q. I think the jury are going to hear from Steve Machin
 16 later in the proceedings.
 17 So insofar as your experience of the terrorist
 18 offenders is concerned, certainly they are distinct and
 19 different in your experience in the way that they behave
 20 and operate through the prison system?
 21 A. Yes.
 22 MR RULE: Thank you very much for answering my questions.
 23 JUDGE LUCRAFT: I don't think there are any other questions.
 24 Mr Hough, can I —
 25 Mr Crilly, thank you very much for coming and can

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1 I echo what was said about your bravery on the day.
 2 Thank you very much indeed.
 3 A. Cheers.
 4 MR HOUGH: Thank you, Mr Crilly.
 5 A. Thank you.
 6 JUDGE LUCRAFT: Shall we take break there, Mr Hough, and we
 7 will have our mid-morning break, ladies and gentlemen,
 8 and sit again in a few minutes' time. Thank you.
 9 (11.24 am)
 10 (A short break)
 11 (11.45 am)
 12 (In the presence of the jury)
 13 JUDGE LUCRAFT: Thank you.
 14 MR HOUGH: Sir, the next witness is Darryn Frost.
 15 MR DARRYN FROST (affirmed)
 16 JUDGE LUCRAFT: Good morning, Mr Frost. If you are happy
 17 to, please do feel free to remove your mask whilst
 18 giving evidence.
 19 A matter for you, you can either sit or stand to
 20 give your evidence, whichever you feel most comfortable
 21 doing. The important thing — please take a seat — is
 22 that we can all hear what you have to say, so there's
 23 a microphone on that bench too, which we will just move
 24 a little bit closer. Thank you.
 25 Questions by MR HOUGH QC

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1 MR HOUGH: Would you please give your full name for the
2 court record?
3 A. Darryn Mark Frost.
4 Q. Mr Frost, do you understand I'm asking you questions
5 first on behalf of the Coroner, and you may then have
6 some questions from other lawyers. You made a witness
7 statement on 6 December 2019 about the matters we're
8 concerned with. I think you have a copy in front of
9 you, and you may refer to it as you wish.
10 In November 2019, what was your job?
11 A. National communications manager at HMPPS, Ministry of
12 Justice.
13 Q. HMPPS is HM Prison and Probation Service?
14 A. Yes, it is.
15 Q. Did you attend the Learning Together on 29 November 2019
16 at Fishmongers' Hall?
17 A. Yes, I did.
18 Q. What was the reason for your attendance?
19 A. I wasn't actually meant to attend, my line manager was
20 meant to attend, but she lives in Cardiff. She knew
21 I had a big interest in offender rehabilitation and
22 forward-thinking programmes, so she invited me to attend
23 on her behalf, and I was there with a work colleague,
24 Tracy Garcia, and we were going to participate and write
25 up an article to share with the rest of staff within the

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1 organisation.
2 Q. Thank you.
3 Now, we have heard that the event involved a brunch,
4 then an opening session and then some workshop sessions
5 followed by a break from shortly after 1.30 that
6 afternoon.
7 During the break, where were you?
8 A. So the session -- I've been to a lot of different
9 sessions, the session prior by an American lady was
10 quite emotive for me, it was almost like therapy, so
11 I was a bit shaken by that, and I was walking around the
12 hall looking at it, and I left it until right towards
13 the end of the break to go to the gents.
14 Q. If we could put on screen a photograph of the Banquet
15 Hall, {PH0050/203}, you will see it come up both on the
16 small screen in front of you and the larger screen.
17 That's the hall where the session had been, which
18 you described as emotive for you. Did you also spend
19 much or all of the break in that room?
20 A. I didn't spend -- I sat there for a little while
21 speaking to the gentleman who was on my left, and then
22 I walked out and walked around the entrance hall -- not
23 the entrance, but the stairwell, but yes, it was mostly
24 in this room and then later on I went downstairs to the
25 bathroom.

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1 Q. Did you return from the bathroom to go upstairs for the
2 afternoon events?
3 A. Yes.
4 Q. We know that there was a feedback session beginning
5 shortly before 2.00 pm. Were you in the room when that
6 began?
7 A. Yes, I was.
8 Q. Looking at this photograph, where were you in the room?
9 A. If you see the second window along the left wall where
10 there are glasses and bottles, the table directly in
11 front of that on the left-hand side.
12 Q. So you were on the far side of the room from the doors
13 leading to the balcony and then to the stairway?
14 A. That's correct.
15 Q. As the feedback session was beginning, did something
16 happen that made you consider what was going on outside?
17 A. So at first there was a scream, which -- or a commotion,
18 which halted the feedback from the lady at the podium,
19 and then there was a period of silence, a short period,
20 and she -- there was a little murmur across the room but
21 then the lady starting feeding back again, and then
22 there was more noise or commotion and some people left
23 the room to investigate, but they said people should
24 stay where they are and they went out the doors.
25 Then there was a small pause, and then there was

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1 another loud scream, it sounded like female voices, but
2 between that, someone in the room said "It must be kids,
3 skateboarders", because we heard a clatter of some
4 items, and it sounded like a skateboard had been thrown
5 or something, and someone said "It sounds like kids, it
6 must be a skateboard".
7 Then when we heard that last set of screams,
8 the gentleman who was on my left in a blue pullover who
9 had been a serving prisoner, he had been released, he
10 just, almost to himself, said "That's not the cry of
11 kids", which was my call to action, and that's when
12 I stood up and ran across the room and out the far
13 doors.
14 Q. Now, was anyone else leaving the room at the same time?
15 A. So from the first table, which is cut off by the screen
16 on the left, you can only see a part of it, I think it
17 was that table, I saw a man stand up at the same time as
18 me, and he left through the nearer doors, the closer
19 doors where the lights can be seen. I think they look
20 like the third -- it was either these closest doors or
21 the other ones, I didn't watch him to see where he left,
22 but he was at the exact same time and he was in the same
23 kind of distance on the other side of the room as me and
24 he got up and ran out.
25 Q. Do you know who that man was now?

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1 A. I now know that to be Steve Gallant.
 2 Q. We've seen CCTV footage and stills that show that he was
 3 in a distinctive purple jumper that day; is that right?
 4 A. He was.
 5 Q. You said that the comment from the person next to you
 6 was your call to action, and that you moved over towards
 7 the doors. Was anyone in the room saying anything to
 8 you at this point?
 9 A. So there were people shouting "Stay where you are, stay
 10 in the room, lock the doors", that's what I heard, but
 11 I left anyway.
 12 Q. We can put on screen a photograph of the landing area,
 13 {PH0050/163}. This is the landing you would reach going
 14 through those doors. When you got to that point, could
 15 you see or hear anything more about what was going on
 16 downstairs?
 17 A. So I knew the noises were coming from downstairs, you
 18 could kind of hear that from the hall, so immediately
 19 I was looking to run down -- down the stairs to see what
 20 it was. I think I came out these doors that are on the
 21 left here in view, and I left going down the far side of
 22 the stairwell .
 23 Q. So going down the left-hand branch of the staircase as
 24 you were looking at it?
 25 A. Yes, the furthest side as you're looking at it now. And

1 as I took about the first one or two steps going down,
 2 a lady was -- so I could see the other man who I now
 3 know to be Steve Gallant was running at the exact same
 4 time as me, and he would have reached the top on the
 5 right at the same time as I reached the top on the left,
 6 then I took my -- because I could see him running, but
 7 then I took my eyes off him because I was going down the
 8 stairs myself, and there was a lady -- a shorter lady
 9 running up who I knew was involved with
 10 Learning Together, but I didn't know who she was. She
 11 was running up those stairs in an absolute panic, going
 12 "Oh my God, oh my God".
 13 Q. Just pause there a second. The lady who was running up,
 14 do you remember who she was?
 15 A. I now know her to be Lisa Ghiggini.
 16 Q. Thank you. Was she saying anything about what was
 17 happening beyond just the exclamation "Oh my God"?
 18 A. No, she had this look of terror on her face, her eyes
 19 were really wide. She had something in her hands,
 20 I assumed it was a telephone but it could have been
 21 anything, it was a silver object which looked like it
 22 had a screen, but as I saw her I looked over near the
 23 corner of the balcony there, and I saw a lady on the
 24 stairs with her, what looked like her neck or throat
 25 slit and blood pouring out.

1 Q. If you just pause there a second and we'll put on screen
 2 a photograph, an empty photograph of the lower part of
 3 the staircase, {PH0050/152}. You say while you were
 4 still on the stairs looking down, you noticed and
 5 immediately focused upon a woman who was injured with
 6 a neck wound. Where was she?
 7 A. So on that stairwell, her feet were -- she was kind of
 8 lying on her side slightly, her one foot was touching
 9 the second step. Her other foot was touching the third
 10 step. Her body was lying upwards along those stairs and
 11 she was kind of lying on her side with her hair down the
 12 side. She seemed very peaceful, she wasn't making
 13 a noise, but that's where she was and I could see blood
 14 coming out of her neck.
 15 Q. Was anyone with her at that stage?
 16 A. I can't recall. At this point all my vision went into
 17 tunnel vision and I saw everything in crystal clear high
 18 definition, but only what was in that frame of focus,
 19 and at that time all I saw was her head, and the wound.
 20 And I knew that Steve -- who I didn't know was Steve --
 21 was running down. He at this point had reached that
 22 corner, where you see the far bust. And, yes, so that's
 23 what happened there.
 24 Q. Now, you had now seen somebody seriously injured. What
 25 did you decide to do?

1 A. I had arrived quite early to the event that day, and
 2 I had taken videos of this entrance hall, I had taken
 3 a selfie on that exact step where she fell, with the
 4 Christmas tree, and I had surveyed the whole area,
 5 unknowingly before, so I knew there was very little to
 6 be used as self-defence or a weapon. I had seen she had
 7 fallen, but I also saw that there was another man
 8 running down towards her, so I knew she would be
 9 receiving care, so I thought I needed to get something
 10 for whatever may be laying ahead.
 11 So I was still on the top of the stairs looking
 12 over, and I instinctively turned back on myself and
 13 I thought I'd get something to arm myself with. The
 14 immediate thought was a chair, but I saw a lot of blood
 15 and I thought that might not be enough, and so
 16 I remembered we had been served lunch, so I was going to
 17 run back into the hall where they served lunch and hoped
 18 to find a knife, but I was also thinking of -- this was
 19 very quick, it was in a split second -- I was thinking
 20 of using the lid of a bain-marie as a shield and maybe
 21 a serving spoon or something, and hoped there would be
 22 something else, but as I ran towards that direction
 23 I glanced over to the left and I passed a dark dimly-lit
 24 hall that I had not seen before, and on either side of
 25 this door were these really long -- I now know they're

1 called narwhal tusks, I thought they were whale tusks,
 2 I didn't know the actual term.
 3 Q. Can you just pause there a moment. We'll see where you
 4 had got to. If we put on screen {PH0050/169}. So as
 5 you were going for a weapon, did you find yourself in
 6 this area with the door ahead to the Court Drawing Room
 7 and with brackets on the wall either side of that door?
 8 A. That is correct. The door was closed and this little
 9 area, although it looks quite bright in the photo, is
 10 actually quite dimly-lit compared to the rest of the
 11 hall.
 12 So the light was shining off the tusks, so they kind
 13 of stood out, compared to the hallway, because it was
 14 quite dim, and so it just looked like these two white,
 15 long shining objects, and so I, rather than carry on and
 16 running into the serving room, which in this photo would
 17 have been to the right, I believe, I changed and went
 18 straight there and took the left narwhal tusk out of the
 19 bracket.
 20 Q. We can see a photograph of a broken narwhal tusk,
 21 {PH0024/5}. We've got an idea of the size of the tusks
 22 from the size of the brackets and from other photographs
 23 that we've seen. These were long pieces of bone,
 24 effectively, the height of a man or more, which were in
 25 the brackets on the walls, and you took one of those,

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1 did you?
 2 A. I did.
 3 Q. Where did you then go?
 4 A. I turned back on myself out of that little hallway,
 5 turned right, and then ran down the stairs on the
 6 left-hand side, which were the closest to me, and ran
 7 back down the stairs.
 8 At this time there was a man, I didn't know if it
 9 was the same man, at this stage there was a man tending
 10 to the lady on the stairs I now know as Saskia Jones,
 11 and I carried on running to where I heard the commotion
 12 coming from.
 13 Q. Could I just pause you there again, and we'll put on
 14 screen a photograph we saw earlier showing the area at
 15 the base of the staircase, just to help visualise
 16 events. {PH0050/152}. You are coming back down the
 17 stairs. Saskia was now being attended to. What could
 18 you see on the lower level?
 19 A. So I had to run past the man giving care to Saskia, and
 20 at this point I had tunnel vision and so I couldn't see
 21 anyone except for where the main noise was coming from,
 22 and almost directly opposite but slightly to the left
 23 from the bottom of those stairs are two wooden doors
 24 with panels in them, and there was the man in the purple
 25 jumper, so it was Steve Gallant, and he had a chair --

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1 it looked like an old mahogany type of chair, quite
 2 sturdy -- and he was almost using the chair to keep
 3 someone or something at bay, I had no idea at this
 4 point, but he was kind of pushing, using the chair to
 5 push the swing door, it was almost like a barn door and
 6 he was using the door almost as a shield and trying to
 7 keep whoever it was at bay behind this door.
 8 Q. Again, may I just pause you there. Where had you
 9 reached when you got this sight?
 10 A. So I had reached the bottom of -- just past the bottom
 11 of those stairs.
 12 Q. So the bottom of the main staircase?
 13 A. Yes. And I wasn't yet down the two small black ones,
 14 but because the doors are slightly to the left from
 15 there, I believe, I couldn't see who Steve at this point
 16 was tackling, I could just hear the clattering of the
 17 chair onto the wooden door, and a noise coming from the
 18 other side as it was hitting onto the door, and someone
 19 was pushing at that door.
 20 Q. Just to be clear, the doors that you were looking at
 21 which were slightly to your left, were they the doors
 22 which separated the main corridor from the entrance
 23 foyer so that you were looking towards the entrance
 24 foyer?
 25 A. Yes, they were.

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1 Q. And Steve Gallant was at one of those sets of doors,
 2 using a chair to fend somebody off, and also it appeared
 3 using the door itself as a form of shield?
 4 A. Yes, and with the amount of time it took me, he couldn't
 5 have been there more than 10-15 seconds before I had
 6 arrived.
 7 Q. So you came close to him, did you?
 8 A. I ran as fast as I could to get to whatever was
 9 happening with this very long whale bone.
 10 Q. As you came close to him, what could you see beyond, in
 11 the entrance foyer?
 12 A. So the second door was actually open and propped open or
 13 held open somehow, and so I went to the left-hand side
 14 of Steve. I had lowered the narwhal tusk to waist
 15 height, and I turned so that I could see through the
 16 doors at what was trying to attack Steve.
 17 At this point, I -- it was really confusing
 18 straightaway because there was quite a difference in the
 19 exposure, because there was this bright light coming
 20 through the foyer hall and shining down onto the floor,
 21 and so it almost at first silhouetted this man, and
 22 I just saw a black shadow until my eyes had a second to
 23 readjust to the light. Then the first thing I saw was
 24 these two shining blades being held next to -- the
 25 blades were above his ear level because he was holding

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1 them up and kind of bashing on the door, and that's when
 2 I pointed -- I didn't attack, I just put the tip of the
 3 narwhal tusk about an inch or two from his midriff.
 4 Q. Could I just pause you there a second, just so we see
 5 where we've got to.
 6 When you saw Steve and you came to his aid,
 7 Steve Gallant, he was in the doorway. You moved to his
 8 side, so you were now at the doorway, separating the
 9 entrance foyer from the main corridor?
 10 A. So we were both, as you look at that image there's
 11 a mosaic tile pattern just to the right of the black
 12 tile. Steve and I were in that hallway, so we weren't
 13 quite in the doorway. We were both this side of the
 14 door.
 15 Q. I think if we look at {PH0050/151}, we can see the
 16 corridor. So that's the corridor with the staircase on
 17 the left just beyond that first bust, and then the two
 18 sets of doors you're talking about are further down on
 19 the right either side of the bust in the distance on the
 20 right?
 21 A. So Steve was standing where you see that border, the
 22 mosaic border around the tiled floor, he was on the
 23 third cross where a T is, right by that second picture
 24 on the right there, and that door, there's a double
 25 door, it's almost like a barn door which are glazed, the

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1 right one was being pushed open and being pushed closed
 2 by Steve, and the left one was -- I didn't see whether
 3 it was inwards or outwards, but it was propped open, and
 4 so I went to the left of Steve there, so about a metre
 5 from that bust on the right in the far corner, and
 6 I turned so I could position myself to see who or what
 7 was attacking Steve.
 8 Q. And from that position you saw what you initially saw as
 9 a silhouette or shadow in the entrance foyer, and then
 10 as your eyes adjusted, a man with two knives at head
 11 height --
 12 A. Yes.
 13 Q. -- tackling Steve, so quite close to where you were?
 14 A. Very close. I had my hands a third down the shaft of
 15 the narwhal tusk, a third of the way down, and so when
 16 I rested or placed it to his belly, I was no more than
 17 a metre away from this man.
 18 Q. How was he moving at that stage?
 19 A. So he stopped banging on the door and he kind of turned
 20 and looked at me a bit puzzled.
 21 Q. Did he say anything?
 22 A. At that point he didn't, but he stopped attacking, he
 23 stopped hitting the door, and he turned and faced me
 24 square on. He still held the knives above him, but he
 25 glanced down at the narwhal tusk and he glanced back up

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1 at me, and he kind of paused for a while, and that's
 2 when I was taking everything in that I saw, the light
 3 was shining in, and there was a lady behind him and she
 4 was curled up in the foetal or recovery position, facing
 5 towards us in a pool of her own blood, her hair was in
 6 that pool of blood. I think she had a white shirt on
 7 and she was laying motionless and there was no one
 8 tending to her, and that's when my attention was pulled
 9 from her because the attacker then addressed me.
 10 Q. What did he say?
 11 A. So he still seemed puzzled or a bit defeated by having
 12 this long object pointed at his belly and he said to me
 13 "I'm not here for you, I'm here for the police.
 14 I'm waiting for the police. I'm here for the police".
 15 I can't remember which order. It was something like
 16 that.
 17 Q. How did he speak those words? Quiet? Loud? Any
 18 expression in his voice?
 19 A. It was surprisingly calm, but a little bit quizzical.
 20 It was like he was trying to negotiate with me, like he
 21 hadn't expected that outcome, and he didn't know what to
 22 do, and it was at that moment I heard a lady's voice
 23 behind me, and I could tell that they were dealing with
 24 Saskia on the stairs and they were obviously looking at
 25 the scene and looking between Steve and I, and they were

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1 looking straight at the assailant, and at that moment
 2 someone gasped, "My God, he's got a bomb", then the
 3 assailant, the attacker motioned downwards with his head
 4 and lowered the knives a little bit and he said "And
 5 I've got a bomb".
 6 Q. Could you see at that point whether there was any device
 7 on or near him that did look like a bomb or explosive
 8 device?
 9 A. Absolutely. His jacket, he had a large puffy jacket on
 10 and the two zippers, it was open, and there was about
 11 a 10-centimetre gap and through the gap I could see what
 12 looked like an explosive device around his waist, and
 13 from that distance it looked really convincing. I could
 14 see cylinders on the left. It was obscured by his
 15 jackets, but there were two lots of cylinders that
 16 I could see through this gap and then something else to
 17 the right of it, it looked a bit more boxy, but it
 18 looked like it was made with duct tape and strapping of
 19 some sort, and it looked pretty convincing.
 20 Q. How long did this stand-off go on?
 21 A. It felt like ages, but it was probably 10 or 15 seconds.
 22 Q. What broke the stand-off?
 23 A. So my head was reeling because he had just threatened us
 24 with a bomb. I had first intended to protect the lady
 25 on the stairs, but then I saw there was a lady behind

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1 him who wasn't being cared for, so I was trying to
 2 figure out a way that we could move him or something so
 3 that the other lady could get some care, but then he
 4 threatened us with a bomb, and I kind of froze, I didn't
 5 know what to do at that stage, and the silence was
 6 broken by -- I don't know if someone else held the door
 7 for Steve or something, because he seemed to have free
 8 access to then throw the chair at Khan, and I was quite
 9 surprised because it was a really heavy looking solid
 10 chair, so Steve put a lot of power into it and really
 11 threw it hard at him, and it was just like -- it just
 12 glanced off the shoulder of Khan, it hit his left
 13 shoulder as we were looking at him, and he kind of just
 14 flinched it off, and then he started going straight
 15 towards Steve, who was on my right, and he had -- the
 16 knives were never fully dropped, but he raised them
 17 again, and he took a step towards his left, which was
 18 our right, and straight towards Steve and started going
 19 towards Steve, because that door was held open by
 20 someone or something, and that's the moment I passed the
 21 narwhal tusk, keeping the point at Khan's belly, because
 22 I knew it kept him at a distance, and I passed it to
 23 Steve, so kind of angling the butt end to Steve, and
 24 I looked straight into Steve's eyes and our eyes met for
 25 a second, I didn't know who he was, and I passed him the

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1 narwhal tusk.
 2 Q. You had given him the tusk to defend himself and to fend
 3 off Khan.
 4 A. Yes.
 5 Q. You were, of course, now unarmed.
 6 A. Yes.
 7 Q. What did you do?
 8 A. So in that second, I had a split second and I was right
 9 in front of Khan, no more than a metre. He had taken
 10 a step forward and I thought I can't help, I can't help
 11 now, so I turned and ran back past Saskia and those
 12 giving her care, back up the stairs to where I knew
 13 there was a second narwhal tusk.
 14 Q. Did you take that second narwhal tusk?
 15 A. I did, but it was hampered slightly because now there
 16 were people filing out of the conference hall and they
 17 were coming out of the same door where the narwhal tusks
 18 were, and as I was trying to take the second narwhal
 19 tusk out, my colleague Tracy Garcia, she was coming out
 20 as well, and she grabbed my arm and tried to stop me
 21 from doing anything, and I could see that she was
 22 frightened and other people coming out were frightened,
 23 and I recall pushing her with my left hand towards the
 24 wall as if to get off me, and I pushed her quite
 25 abruptly, and I said something I couldn't recall, but

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1 another work colleague has repeated what I apparently
 2 said then.
 3 They were a few frustrating seconds because this
 4 narwhal tusk seemed to be about 2 inches longer than the
 5 other one. I know this because when I dropped this one
 6 off the bottom hilt and it reached the ground there
 7 wasn't enough clearance to pass the top holder, there
 8 were gold-gilded mermaids and mermen, and I didn't want
 9 to break the tip off because I knew that I would need
 10 something sharp and these things were quite heavy but
 11 I could tell they were probably brittle and there were
 12 about 3 or 4 seconds where I was having to wiggle it to
 13 get the angle so that I didn't break the tip off.
 14 Q. Were you able to free it?
 15 A. I managed to free it reasonably quickly, but not quick
 16 enough.
 17 Q. Where did you go from there?
 18 A. So I turned back down that little hall. As I did that,
 19 I saw a lady in a white shirt with long dark hair, and
 20 she was holding her left arm and there was blood on her
 21 blouse. I was startled by that because I never knew
 22 that there were more people injured, but then I didn't
 23 pause at all, there were enough people there to care for
 24 her, so I ran straight back down the route that I'd come
 25 up, past Saskia and back into the hall, the front

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1 entrance hall.
 2 Q. When you got to the entrance foyer, was Khan still
 3 there?
 4 A. No, there were broken bits of narwhal tusk scattered in
 5 the hall, and I saw the door close just as I saw the
 6 foot of someone going out, who I assumed was
 7 Steve Gallant, because I saw the evidence of the broken
 8 narwhal tusk, and Steve was no longer in that room.
 9 Q. So you saw the main doors just closing as you were
 10 coming into the entrance hall?
 11 A. The front door closing, yes. These doors closest to us
 12 were still open, because -- I don't know if they were
 13 open, but I managed to run through with quite a long
 14 object without catching it on anything or anyone. And
 15 then I remember getting to the door and trying not to
 16 stab anyone with this, and not knowing where people were
 17 that were in that entrance hall.
 18 My memory has blanked looking out for anyone in that
 19 entrance foyer or if there were any people, I can't
 20 recall that anymore.
 21 Q. When you got out to the main entrance doors, first of
 22 all were those doors open or could they be open?
 23 A. So I think they were closed and I had to ask someone to
 24 open the door, so I couldn't reach the door holding this
 25 long -- I think I had it upright, but I couldn't open

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1 the door, there was still someone stood on the inside
2 and they opened the door for me, and then I went out,
3 but I didn't know if they'd gone left or right or where
4 they would have been, so I needed to try and see them,
5 but I didn't see any person out there, except for Khan,
6 because I had this tunnel vision that was just focused
7 on him.

8 Q. Where was he at that stage?

9 A. So he was going towards the right towards, I believe
10 it's the south side of London Bridge, and he was
11 running. He didn't look very fit, but he was running
12 and still had the knives up.

13 Q. Could you just pause there. We'll show a photograph of
14 the view {PH0008/4}. This is a view obviously taken at
15 night, but a view from the bottom of the steps towards
16 London Bridge. Is this the view that you had, obviously
17 rather earlier in the day in daylight?

18 A. Yes, except for — I didn't see anything except for if
19 you had an obscured view of just those bollards, that
20 narrow, because my focus had blurred everything else out
21 except for Khan and the people who were running beyond
22 him, away from him.

23 Q. Where had he reached?

24 A. He had — I'm not sure where he had reached, but
25 I remember as I was running, this loud noise went off to

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1 the right of me and I was shocked, because I was so
2 focused on Khan I hadn't realised there were other
3 people, and what happened was the fire extinguisher had
4 just gone off next to me whilst I was running at full
5 speed, and that made me check, because I was not focused
6 on that at all, and I looked to the right and there was
7 a man with grey hair who I had not met before, and
8 beyond him, through the smoke, I could see
9 Steve Gallant, and Steve's and my eyes met again because
10 we were startled by the noise, and we looked at each
11 other.

12 They had been kind of like standing probably, if you
13 see the second wooden triangular thing, they were
14 probably just in line with that to the right, and I was
15 there when this fire extinguisher went off and it
16 surprised me.

17 Q. So you had come straight out of Fishmongers' Hall.

18 A. Yes.

19 Q. You had seen Khan heading towards London Bridge?

20 A. Yes.

21 Q. You had gone after him and, reaching a point maybe 5 or
22 10 yards from the base of the steps, you become aware of
23 the fire extinguisher setting off, and you see that
24 Mr Crilly and Mr Gallant are near you?

25 A. Yes. They both looked quite quizzical themselves, and

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1 I was running at a hell of a pace. I was so focused on
2 Khan that I must have overtaken them, but I thought they
3 had stopped there, and I never realised that they
4 followed when I ran past them, and then it was only
5 a fleeting glance and then I looked straight back at
6 Khan and I saw a wave of people, some, I think, were
7 jumping over that barrier, and people were running into
8 the road.

9 I didn't say anything, but I could hear, I think it
10 was Mr Crilly and Mr Gallant, screaming at people and
11 there were some other voices screaming and warning the
12 public, and I was still in shock and stunned into
13 silence and just focused on Khan, and I could see the
14 knives glistening in the sun.

15 Q. How close were you behind him at this point?

16 A. He had a good head—start on me, to be fair. He was
17 probably near those three black barrier bollards when
18 I got to near the base of the stairs, and I just ran at
19 full sprint towards him. I can't recall which side of
20 the barriers I went, but I caught up with him. There's
21 some objects behind those black bollards that you can
22 see there in black, he had gone just past that, it seems
23 to me, and then I had nearly caught up with him.

24 I thought I was on my own, and that's the point where he
25 realised he couldn't catch up to any of the public who

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1 were running away. The public looked like a shoal of
2 bait fish being chased by a predator, they had all
3 bunched up and it had become quite dense the other side
4 of him, but they all had about 20 metres on him and so
5 he couldn't reach anyone and that's when he turned back
6 and faced me.

7 Q. So he turned and stopped?

8 A. He stopped and then turned.

9 Q. How close were you to him by that point?

10 A. So I was probably about 3 or 4 metres away from him.

11 Q. Did he stay stopped?

12 A. No, he then raised the knives up again and started
13 running towards me.

14 Q. What was your move in response?

15 A. So I could see that he was trying to attack me and
16 I thought I would need to keep some distance, so as he
17 raised his arms, he raised them so much that there was
18 a tiny piece of skin that showed on his left — I must
19 say that time slowed down so slowly that I could see his
20 every movement and I was able to aim for that centimetre
21 of flesh that was showing on his left side, and I aimed
22 the tip of the narwhal tusk at that, and as he was
23 running towards me, I thrust it into him.

24 Q. Did you strike?

25 A. I did.

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1 Q. If we can look, please, at a CCTV still of this moment,
2 {DC7421/32}, is that the moment of you making contact?
3 A. It is.
4 Q. Then {DC7421/35}, I think we can see the same moment
5 from a different perspective, with you seen as
6 a silhouette and the smoke of a fire extinguisher just
7 behind you?
8 A. That is correct.
9 Q. What was the effect on the attacker, Usman Khan, of you
10 striking in the way you've described?
11 A. I don't think he expected to be struck by this. I don't
12 know if he had some protection on or something, but his
13 reaction — he didn't seem to react at the first moment
14 it penetrated him. It did — the force of it made him
15 kind of buckle over and he had the knives and it looked
16 like he tried to swipe at the same time.
17 But then I thought he was going to attack me again,
18 so I thought I should retreat slightly and be ready for
19 the next attack, so when I pulled it out of him, that's
20 when I think he kind of dropped the knives slightly, and
21 then everything happened so quickly I wasn't expecting
22 it, I didn't know that anyone else was there, but at
23 that moment the fire extinguisher went off, but it
24 didn't actually hit Khan, so it wasn't in my straight
25 view. It was quite windy on the bridge and the wind was

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1 blowing as you look at this picture from the left to the
2 right, and all the smoke carried over and this guy
3 Steve Gallant on the far right, who, because I had just
4 stuck the narwhal tusk into Khan and pulled it out, Khan
5 kind of flinched and went down, and the knives dropped
6 for a split second, in that moment, John Crilly let off
7 the fire extinguisher, which miraculously disguised
8 Steve Gallant running past the assailant's left
9 shoulder, which meant Steve was now directly behind
10 Khan, and because Khan had gone kind of forward and was
11 slightly off balance, then Steve pulled his shoulder
12 backwards for the assailant, and the assailant kind of
13 lost his balance totally and fell over on to his knees
14 with his head then kind of facing to the side of the
15 street as we look at it.
16 Q. Can we just pause here and just see things from your
17 perspective.
18 You have stabbed at Usman Khan, the attacker, with
19 your narwhal tusk, you pull it away, and in that moment
20 he seemed slightly off balance and lowers the knives in
21 front of you?
22 A. It seemed like the pain didn't strike him when I stabbed
23 him, it looked like it struck him when I pulled it out.
24 So the impact doubled him over, but he looked up at me
25 when I pulled it out as if he was shocked to be in pain.

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1 Q. And at that moment the fire extinguisher went off?
2 A. Yes.
3 Q. But it didn't obscure your vision of Khan?
4 A. Not at all.
5 Q. And in that moment, immediately after the fire
6 extinguisher went off, Mr Gallant moved in from your
7 right?
8 A. Yes, and I was actually shocked and confused because
9 I thought I was alone, so I thought I was just battling
10 him and that I would have to face him again, and so
11 I had steadied myself ready for another attack, and so
12 I had taken a half step backwards and steadied my feet
13 and repositioned the narwhal tusk, and I was ready for
14 the next move of him attacking me, but that didn't
15 happen because the fire extinguisher went off and
16 Gallant toppled him off balance.
17 Q. Mr Gallant was unarmed at this stage?
18 A. Yes.
19 Q. And he effectively threw himself at this man armed with
20 two knives?
21 A. He did.
22 Q. And that had the critical effect of bringing him down?
23 A. It did.
24 Q. What did you then do?
25 A. There was a slight second where I was confused, because

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1 I never knew I had back up or anyone else with me, and
2 then I realised Khan was on the ground, so I just
3 dropped the narwhal tusk and jumped onto the assailant's
4 back, and immediately reached out for his wrists and
5 I was directly on his back and he was slightly off
6 centre, slightly on his side, and I was on his back and
7 I had my hands outstretched over his head, grabbing his
8 wrists and holding — it was more his hands than his
9 wrists, I was over his knuckles with my hands, and I was
10 holding them upright as far outstretched as I possibly
11 could so that he couldn't swipe at anyone, because he
12 was trying to move his arms, and he couldn't set off the
13 bomb that he had threatened us with.
14 Q. You said he was trying to move his arms; in what way was
15 he trying to move his arms?
16 A. So he was obviously trying to roll over again, and
17 I could feel the power in his arms because he was trying
18 to pull the knives and he was resisting against my arms
19 that were fully outstretched, so I could feel him trying
20 to move side to side, and I just put all my body weight
21 on him and just stretched my arms out, forward as much
22 as I could, with my body kind of over his right
23 shoulder, laying on him. It wasn't directly on his
24 back, I was kind of on his right shoulder with my hands
25 over his shoulder, side of his head. So my face was

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1 practically next to his face, as I was holding our arms
2 out straight.

3 Q. Were you aware he still had the knives in his hands?

4 A. I was, very aware. I was looking at the knives and
5 I knew that Steve — I could tell Steve was on my right.
6 I couldn't see where John Crilly was, but I was just
7 focused on keeping the knives — I think he had some
8 gloves on because it felt like his hands were protected.
9 I think I saw plastic knuckles, almost like a mountain
10 bike glove, I may be wrong, but that's what I seem to
11 recall, and with some tape.

12 Q. What were you next aware of?

13 A. So then I thought it was just the public. People came
14 running in and they started hitting and kicking him.
15 His head was to my left as I lay on him, and they
16 started kicking him and punching him in the head, and
17 instinctively I had to then shift my whole body weight
18 to cover his head and protect his head, which meant
19 I had to take my eyes off the knives.

20 But at this point, just before I took my eyes off
21 the knives, someone came and stood on my hands, and
22 I remember it because it was quite painful, but there
23 was a lot of pressure, I can still remember, it was
24 a tan boot with a tan sole, quite thick rubber, and it
25 was digging into my right hand, and I remember the pain

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1 of these boots on my hands but I was relieved for it
2 because it meant I wasn't just holding his hands with
3 all my body force and I could relax and recover at that
4 point, but because people started hitting him in the
5 head, I shifted my body weight, I had to take my eyes
6 off the knives, and I was shouting "Don't hit him, don't
7 hit him, take the knives off him, take the knives off
8 him", and I must have screamed "Take the knives off him"
9 many times repeatedly but at this stage I couldn't see
10 anything, I was now blind to what was going on because
11 of my positioning — well, I wasn't blind, I couldn't
12 see what was happening with the knives. I could see
13 towards the street.

14 Q. How long did you remain grappling with him before
15 something happened to cause people to start getting off
16 him?

17 A. So I was on top of him for a minute or so and then I was
18 aware of police officers jumping over the barrier,
19 because that's where I was kind of looking, and they
20 were shouting "Armed police, move away, armed police,
21 move away".

22 Q. How did the others who were tackling and grappling with
23 the assailant respond to those instructions?

24 A. So the others did as the police asked and they moved
25 away, and I was left holding Khan's hands on my own.

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1 Q. Did you stay holding on for longer than the others?

2 A. Yes, I did.

3 Q. Why was that?

4 A. Well, he had threatened us with this bomb, and in the
5 hall he said he was waiting for the police, he wasn't
6 there for me, he was waiting for the police. So in my
7 mind, the police arrival was his trigger to blow
8 everyone up, and I didn't let go because there were
9 a lot of people helping to hold him down, but I couldn't
10 let go of him then either because the people didn't move
11 away. The public seemed to move away, but those who
12 came to tackle him, I could still feel bodies around me
13 and hear people around me, there was a lot of shouting
14 and things, but I couldn't let go because I didn't know
15 if he still had the knives or not because I had to take
16 my eyes off of his hands, and I also knew he had
17 an explosive device that he had threatened us with so
18 I didn't want him setting it off.

19 Q. As you were the last person holding him, did the police
20 say anything to you particularly at that time?

21 A. So the police were firm and shouting. There were three
22 police officers, I remember them. I didn't see two of
23 them, I could just see their feet and their guns. They
24 were in my vision and I could see them just ahead of me,
25 no more than a metre or two away, but the closest

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1 officer came really close to me, and he came quite close
2 to Khan, and he was shouting at people to move away, and
3 I could feel people moving away, and he was shouting at
4 people to move away and...

5 Q. Did you say anything to the officer in response?

6 A. Yes, I did. I shouted something to the effect of "I've
7 got his hands. He can't kill anyone else. I won't let
8 him kill anyone else", and I shouted that very loud.

9 Q. And did it remain your concern to avoid Khan letting off
10 the device?

11 A. Absolutely. I didn't want — but also I didn't want him
12 to be shot because his statement that he was waiting for
13 the police made me believe that he wanted to die, and
14 I had seen the chaos he had caused in that hall and
15 I didn't want him to have the satisfaction of his choice
16 when he took away others.

17 Q. Okay. If we can look at an image of this moment. It's
18 {DC7421/33}. This is the moment of you being the last
19 person holding Khan, and the officer by your side?

20 A. Yes.

21 Q. Did the officer do anything else to move you away?

22 A. At first he was just shouting "Move away, move away",
23 shouting very loud. He didn't seem to listen to me when
24 I was shouting that I had his hands. I was wondering
25 why, if there were three of them, no one was helping me

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1 restrain him. I think it was around this time that
 2 Steve Gallant came back and he grabbed my right shoulder
 3 and he said something like "Come on, mate", and
 4 I shrugged him off, and I wasn't letting go of Khan, but
 5 whilst I was the only one there, Khan kind of struggled
 6 around from being on his kind of side, sort of face
 7 down. He now wrangled himself to be facing me directly,
 8 and so I tried to position my body as much as I could
 9 over him and keep his hands. He kept trying to lower
 10 his hands and wrestle with me, and I just kept trying to
 11 hold his hands away from the belt and away from me.
 12 Q. Did the police officers then try to remove you?
 13 A. So the police officers kept shouting "Move away, move
 14 away", but they didn't have the information that I had
 15 had, they didn't know that he had a bomb and that he had
 16 threatened to set it off when the police had arrived, so
 17 I refused to move.
 18 Q. Did they do anything to move you?
 19 A. They still kept shouting and started tugging at me
 20 gently. It would be — it was firm, but a gentle tug.
 21 The closest officer there, WS5, was really close now,
 22 but I would not leave Khan alone. So there was
 23 a struggle for a while, and when Khan saw that I would
 24 not release him, he seemed to relax a little bit and he
 25 then just looked up to the officer, WS5, and very gently

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1 said "I've got a bomb".
 2 Q. How did the police respond to those words?
 3 A. The police officer started shouting "He's got a bomb,
 4 he's got a bomb", he seemed so distressed, his voice
 5 kind of broke, and he kept shouting that over and over,
 6 and as this happened it reminded me to look at the bomb,
 7 which I thought was a bomb, and I looked down, my face
 8 was no more than 10 or 15 cm maximum away from the
 9 device now, and no one had noticed the bomb before
 10 because of the way he was lying on his side, the jacket
 11 was obscuring it, so none of the pedestrians or anyone
 12 else coming in would have really known that he had
 13 an improvised explosive device on him at that time, but
 14 when it was just me, he rolled on to his back and this
 15 allowed the jacket to naturally fall with gravity open,
 16 so it exposed the bomb.
 17 But because it was black on black, the officers
 18 hadn't noticed it, and they were trying to coax me off
 19 and looking at his face and my face, but then when Khan
 20 said "I've got a bomb", the officer glanced down to his
 21 midriff and that's when he shouted "He's got a bomb", he
 22 shouted it so loud his voice broke, and then he shouted
 23 at the public to move away, which is what I wanted,
 24 I wanted everyone to move away: he had a bomb.
 25 But in that split second, I looked down and I was so

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1 close to it that beside these tubes, there looked like
 2 there was a little box, but I was so close it looked
 3 like it was made out of cardboard and there was a gap
 4 about a millimetre and a half, and I could see through
 5 it that it was empty.

6 So then I wasn't sure if it was a real bomb or not,
 7 but the officer then started being a lot more aggressive
 8 in how he was trying to tell me to move away and he
 9 started really tugging at me. I resisted the first
 10 three or four, but then when I saw this little gap,
 11 I had a moment of hesitation thinking that maybe the
 12 bomb is fake and maybe I should let go. So I was
 13 contemplating — this was a very short amount of time,
 14 but the time seemed to slow down exponentially, and
 15 I was deciding on whether or not to let Khan go, but
 16 I thought if I let him go there was still a chance that
 17 he would set off this bomb.

18 So I had seen that, and then I thought I was risking
 19 getting shot in the head if I didn't let go, so I was
 20 hesitant and then decided to comply, but then as I was
 21 about to comply, I looked back down and I thought
 22 I saw — and I don't know if my brain made this up — it
 23 looked like a mobile phone attached to the belt, so then
 24 I had this moment of confusion. I thought I was in
 25 control of the situation by isolating his hands from the

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1 belt, but then I think I saw a mobile phone and then
 2 I had a thought that maybe someone else could
 3 remote-detonate this, but because I had hesitated, the
 4 officer had managed to pull me up and I was slightly off
 5 balance so I had to let go of Khan and run to the side.
 6 Q. If we look at two more images, we will see this moment
 7 {DC7421/37}. If we look at the lower image, please. Is
 8 this the moment the officer is pulling you off with more
 9 force?
 10 A. It is.
 11 Q. Then page 41, please, {DC7421/41}. The same moment,
 12 I think, from a different perspective?
 13 A. It must be. I've never seen these images.
 14 Q. You can take those images off screen now, please.
 15 As you were pulled away, did your vision move away
 16 from Khan and the officers?
 17 A. They were behind me and I was expecting an explosion.
 18 Q. What did you hear in fact behind you?
 19 A. So it was like three cracks and an echo. I thought it
 20 was fireworks because I was still contemplating — so
 21 because I had seen the gap in the cardboard box, I was
 22 thinking it's either a real bomb or it's amateur, so
 23 then I was convinced that what I heard was fireworks and
 24 that he had set off this device, but it was of
 25 an amateur nature, and the bangs were the device going

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1 off on him. I thought then that everyone was dead in
 2 the near vicinity, including the police I was trying to
 3 protect.
 4 Q. Did you look around?
 5 A. So straight after the bangs I looked straight towards
 6 Khan and I was looking to see for smoke from what
 7 I thought must have been these fireworks, but there
 8 didn't appear to be any smoke from him or his body, so
 9 I deduced that the police had shot him. I thought they
 10 had shot him dead then and there, because when I was
 11 looking at Khan he wasn't moving.
 12 Q. Did the police give you any instructions?
 13 A. They just kept shouting "move away, move away". I had
 14 taken refuge nearby and I remember them chasing and
 15 I just had this saying going in my head over and over
 16 saying: it's amateur, it's amateur, it's amateur, which
 17 was me probably trying to convince myself that it was
 18 an amateur device rather than a real one.
 19 Q. Shortly after that, did you return to Fishmongers' Hall?
 20 A. So that was a very distressing incident and my memory
 21 blanked. Until I got into the hall, I don't know --
 22 I then recollect my memory and I've got the narwhal tusk
 23 in my hands or a broken length of narwhal tusk, which
 24 I don't know where I collected that from, and there was
 25 a lot of debris and things in the hall and

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1 I instinctively ran straight up to the closest window to
 2 where this had all happened with Khan and the police.
 3 I wanted to see what happened, because I was still
 4 fearful for the lives of the police officers, and
 5 I didn't know if that was a real device or not, so
 6 I went up there and I took a photo down of the scene,
 7 and whilst I was there, I believe it was a female police
 8 officer, came to the door of the room and shouted at me
 9 to get away from the windows.
 10 MR HOUGH: Thank you very much. Now, I'm not going to ask
 11 questions about further experiences in the hall, because
 12 the jury have heard plenty of evidence about the
 13 evacuation and the first aid. If others wish to ask you
 14 about those, they no doubt will.
 15 Those are all my questions for the moment. I'll
 16 look to one side to see if others have questions?
 17 MR ARMSTRONG: Sir, I have no questions but I would like to
 18 extend my recognition and thanks on behalf of Jack's
 19 family to Mr Frost also.
 20 JUDGE LUCRAFT: Thank you very much indeed, Mr Armstrong.
 21 Can I just see whether there are any other
 22 questions. No.
 23 Can I do two things: first of all, can I thank you
 24 very much indeed for coming, Mr Frost, to give your
 25 account of the incident, and can I also simply echo the

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1 words that were said about your amazing bravery on that
 2 day. Thank you for everything you did.
 3 A. Thank you, sir.
 4 MR HOUGH: Sir, I would suggest we have a slightly early
 5 lunch break and early start to the afternoon rather than
 6 start Mr Gallant and break him off.
 7 JUDGE LUCRAFT: Yes. We will do what we did yesterday,
 8 Mr Hough, which is to break there, it's now 12.50, so if
 9 we aim to sit again at 1.50, we will take our lunch
 10 break there. Thank you.
 11 (In the absence of the jury)
 12 I'll rise.
 13 (12.50 pm)
 14 (The short adjournment)
 15 (1.48 pm)
 16 (In the presence of the jury)
 17 JUDGE LUCRAFT: Yes, Mr Hough.
 18 MR HOUGH: Sir, the next witness is Steve Gallant.
 19 MR STEVEN GALLANT (affirmed)
 20 JUDGE LUCRAFT: Good afternoon, Mr Gallant. If you are
 21 happy to, please do remove your mask when giving
 22 evidence. If you want to keep it on, that's absolutely
 23 fine. If you wish to sit, there's a chair to your side,
 24 you can sit or stand, whichever is your preference.
 25 A. I'll sit down, thanks.

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1 JUDGE LUCRAFT: Please do. And there's also a microphone on
 2 that desk, Mr Gallant, which will help to amplify your
 3 voice. It may be that you are shown some documents,
 4 some images. Those will appear on the small screen in
 5 front of you, and there are bigger screens you can look
 6 at too if that is easier for you.
 7 A. Okay.
 8 JUDGE LUCRAFT: Thank you.
 9 Questions by MR HOUGH QC
 10 MR HOUGH: Would you please give your full name for the
 11 court record.
 12 A. It's Steven Gallant.
 13 Q. Mr Gallant, you understand I'm asking you questions
 14 first on behalf of the Coroner, and you may then receive
 15 some questions from others. Your witness statement
 16 about these matters was made on 5 December 2019, you may
 17 refer to that if you wish, otherwise we may refer to it
 18 from time to time.
 19 By way of background, in November 2019 were you
 20 an inmate at HMP Springhill?
 21 A. Yes.
 22 Q. By that time, had you an association with
 23 Learning Together going back a little time?
 24 A. Yes.
 25 Q. I think it went back about two years from that point.

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1 A. Something like that, yes.
 2 Q. Had you first become involved with Learning Together
 3 while at HMP Warren Hill?
 4 A. Yes.
 5 Q. At that time had you participated in a course of study
 6 alongside university students?
 7 A. Yes.
 8 Q. Through that course, had you also got to know the
 9 founders of Learning Together, Drs Ludlow and Armstrong?
 10 A. Yes.
 11 Q. Did you also know Jack Merritt, the course coordinator?
 12 A. Yes, I did.
 13 Q. And Simon Larmour, one of the researchers?
 14 A. Yes.
 15 Q. Are you able to say in a sentence or two how you found
 16 the experience of studying in Learning Together, and
 17 what effect it had for you?
 18 A. I found Learning Together, well the group and the
 19 individuals involved, very inspiring. I took a lot from
 20 that. They taught me introduction to law, they were
 21 caring, brilliant people, and they had a massive
 22 positive impact on my life.
 23 Q. Was it because of that connection with Learning Together
 24 and the individuals behind Learning Together that you
 25 were invited to the five-year anniversary alumni event

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1 at Fishmongers' Hall in November 2019?
 2 A. Yes.
 3 Q. We have heard from Adam Roberts, a prison officer, that
 4 he escorted you to the event; is that right?
 5 A. Yes.
 6 Q. On 29 November 2019, did you arrive at Fishmongers' Hall
 7 in the morning?
 8 A. Yes.
 9 Q. And before the opening sessions, did you meet various
 10 people whom you had met before through Learning Together
 11 and at Learning Together events?
 12 A. Yes, I did.
 13 Q. Now, we have heard that there was a brunch session
 14 between 11.00 am and 12 noon in a room on the first
 15 floor; did you join others to have some food and drink
 16 in that room?
 17 A. Yes.
 18 Q. While you were there, do you recall seeing a man of
 19 Asian appearance who you later recognised as the
 20 attacker?
 21 A. Yes. Initially I thought I'd seen an Asian man who
 22 I thought was Usman Khan, yes.
 23 Q. Had you met him before?
 24 A. No.
 25 Q. We know that there was an opening session from shortly

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1 after 12 noon in the Banqueting Hall. Were you present
 2 for that opening session?
 3 A. Yes.
 4 Q. There were speeches by Dr Ludlow and Dr Armstrong and
 5 also somebody from The Fishmongers' Company?
 6 A. Yes, that's right.
 7 Q. After that we've heard that the attendees split into two
 8 groups around 12.30. Where did you go at that time?
 9 A. I stayed in the -- no, I entered the Banqueting Hall.
 10 Q. We know that the session that took place there was
 11 a session led by an American lady --
 12 A. Mm--hm.
 13 Q. -- from an organisation called Brink Literacy.
 14 During that session, do you remember any
 15 contribution made by the man you later identified as the
 16 attacker?
 17 A. Yes.
 18 Q. What was that contribution?
 19 A. I think the -- it was put to the floor, it was talking
 20 something about ideas or things that happened to us in
 21 the past and I remember this Asian guy giving his
 22 contribution, and he -- he -- he said that he used to
 23 believe something when he was younger and he no longer
 24 believed it, and he knew it was wrong and that he had
 25 informed some friends of his that what they still

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1 believed was wrong.
 2 Q. So in summary was he saying that he had grown up and
 3 improved over the years?
 4 A. He'd changed his mind, yes.
 5 Q. What was his demeanour and way of speaking when he made
 6 that contribution?
 7 A. He was calm.
 8 Q. After that session, we know that there was a break for
 9 15 or 20 minutes, during which some people took comfort
 10 breaks and so on.
 11 We also know that just before 2 o'clock that
 12 afternoon, a feedback session began in the Banqueting
 13 Hall. Where were you when that feedback session began?
 14 A. In the Banqueting Hall.
 15 Q. If we can put on screen a photograph of the Banqueting
 16 Hall, it will come up, {PH0050/203}. That's an overview
 17 of the Banqueting Hall. Which part of the room were you
 18 in at the start of that feedback session?
 19 A. The seat where I was sat is out of view, so it's just
 20 behind the board on the bottom left, so you can't
 21 actually see where I was sat.
 22 Q. So at the far side of the room from the doors leading to
 23 the balcony?
 24 A. On the left--hand side, bottom.
 25 Q. Yes.

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1 A. Yes.
 2 Q. Which would have put you near the windows —
 3 A. That's right, yes.
 4 Q. — on the far side of the room from the doors that led
 5 to the balcony?
 6 A. Yes, you can just make out the table there.
 7 Q. And was Mr Roberts there with you?
 8 A. Yes.
 9 Q. Did you become aware of something happening outside the
 10 room?
 11 A. Yes. Once everybody re-entered the Banqueting Hall, all
 12 of a sudden we heard screams, high-pitched screams, and
 13 that's when I became aware that something was happening.
 14 Q. Could you tell anything about the screams, such as
 15 whether it was a man or a woman?
 16 A. It was a woman.
 17 Q. Where was the scream coming from so far as you could
 18 tell?
 19 A. Outside the room, possibly downstairs.
 20 Q. How long did the scream go on?
 21 A. 10, 20 seconds, intermittently.
 22 Q. Was there then silence?
 23 A. Intermittently.
 24 Q. What then came?
 25 A. They continued, and obviously somebody seemed in

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1 trouble. So as they continued, Adam, who had escorted
 2 me to the event, who was sat with me, turned around and
 3 said to me "Stay there", while he went to go and
 4 investigate, so I just sat down and he walked out the
 5 room to go and investigate.
 6 Q. Did others leave the room at that point?
 7 A. I'm not sure. I think it was only Adam.
 8 Q. Over the minutes that followed, did anyone return to the
 9 room?
 10 A. Yes. It was Amy Ludlow.
 11 Q. Did she say anything?
 12 A. She came back in and she said: everybody stay there,
 13 it's Usman, and started dialling the numbers on her
 14 phone.
 15 Q. So she says "It's Usman"?
 16 A. "It's Usman".
 17 Q. Did she say anything about what Usman was doing?
 18 A. No.
 19 Q. And you said she was on the phone?
 20 A. Yes.
 21 Q. Where did you then go?
 22 A. At that point, it was obvious that something was wrong,
 23 so — the screams were continuing so I jumped up and
 24 went to investigate.
 25 Q. Did you go through the doors leading to the balcony?

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1 A. Yes.
 2 Q. Could we put on the screen {PH0050/163}, we'll see our
 3 photograph of the balcony. When you reached that point,
 4 were there any more sounds coming from below?
 5 A. I'm not quite sure at that point, but I was just heading
 6 that way anyway, so no, I couldn't particularly hear
 7 anything at that point.
 8 Q. Where did you go?
 9 A. I went down the stairs on the right side.
 10 Q. If we could put on screen {PH0050/152}, we'll see our
 11 photograph of the lower part of the stairway and the
 12 area at the bottom. As you came down the stairs, what
 13 could you see below?
 14 A. Immediately I saw a young girl laid on the bottom of the
 15 steps. She looked lifeless, clearly in trouble. Adam,
 16 my escorting officer, had his hand on her neck, or about
 17 that area, seemingly trying to stop the flow of blood.
 18 Q. Could you see anyone else in that area at that time?
 19 A. Not close to them, no, but as I got closer, moved closer
 20 down the stairs, I saw another lady curled up in a ball
 21 on the floor.
 22 Q. Where was that lady in relation to the bottom of the
 23 staircase?
 24 A. To the left, a bit further away, a couple of metres
 25 away.

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1 Q. Was anyone with her?
 2 A. Not that I've noticed.
 3 Q. Did you continue to look around?
 4 A. Yes. So obviously I'd seen these two girls in
 5 a terrible condition, the other girl was on the floor,
 6 she had blood coming underneath her, and then I looked
 7 forward and I looked into the foyer which is the
 8 entrance to the building, and I saw an Asian man stood
 9 there with two knives in his hands.
 10 Q. Did you at first recognise the Asian man and that you
 11 had seen him before?
 12 A. I wasn't 100% sure that was him, but it was obvious that
 13 he was responsible for what had just happened to these
 14 girls.
 15 Q. You said that he had knives, plural, holding two knives?
 16 A. Two knives, yes.
 17 Q. Did you notice anything else about him other than that
 18 he was Asian and holding two knives?
 19 A. Nothing particular, no.
 20 Q. You immediately formed the view that he was responsible
 21 for what had happened, that he had attacked the two
 22 girls?
 23 A. Yes.
 24 Q. How close was he to you? Obviously where you were on
 25 the stairs, there's the area leading to the pillars, and

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1 then the corridor beyond which leads to the doors to the
2 entrance foyer. How far was he away from you?
3 A. About three, four metres? I mean, the space there looks
4 much bigger than what I thought it was in my mind, so
5 yes, it could be about four metres.
6 Q. We can look at another photograph, {PH0050/65}. Now,
7 this is the corridor with the staircase on the right
8 just out of view, and the doors to the entrance foyer
9 are first of all immediately to the left of the
10 photographer and, secondly, there's one door just beyond
11 the first bust we see on the left?
12 A. Yes.
13 Q. Where was the attacker when you first saw him?
14 A. He was in the door to the left, so he was inside the
15 door, inside the foyer, so you wouldn't be able to see
16 him from this image.
17 Q. In that moment, what did you decide to do?
18 A. Well, you know, those girls were still vulnerable, they
19 needed medical attention quite quickly, so I just
20 decided to either get Usman to the ground somehow or
21 just occupy him until the police arrived, so I looked
22 down on the floor and there was a big piece of wood.
23 Q. Could you tell what the piece of wood was? What purpose
24 it served?
25 A. It had clearly arrived there from a skirmish that

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1 happened before I'd got there, because it looked
2 completely out of place, it was just like a -- the width
3 of a baton, no bigger than 2 to 3 foot long.
4 Q. What did you do with it?
5 A. So I picked it up and I moved towards Usman into the
6 foyer area, and I launched it at his head.
7 Q. Did it connect?
8 A. If it did, very, very lightly, but it definitely hit
9 the -- I think it was a curtain or the wall behind him.
10 Q. How did the man react?
11 A. He then moved towards me, pulled back his coat, opened
12 his coat and showed me his bomb, or what seemed like
13 a bomb, something strapped to his waist.
14 Q. Could you put on screen {PH0026/5}. Now, this is
15 an image, I think, of what he was wearing after it had
16 been cut off later that day. Do you recognise that as
17 the item around his waist?
18 A. Well, I mean, it looked something like that.
19 Q. What did you make of it?
20 A. I wasn't fazed by it. For some reason I just made the
21 assumption that it was fake. You know, it looked
22 authentic but I just made an assumption in my mind and
23 just chose to ignore it.
24 Q. So he was coming from the entrance foyer through those
25 doors, you were further towards the staircase?

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1 A. I was probably in the foyer doorway at that time,
2 probably backing away as he came towards me, so he was
3 still in the foyer at that point.
4 Q. How much distance were you keeping between you?
5 A. 2 or 3 metres, if that.
6 Q. At this point, of course, you had nothing to defend
7 yourself with?
8 A. No.
9 Q. Were you aware of anyone else around you?
10 A. Not until I looked to my right and saw another gentleman
11 there holding a narwhal tusk.
12 Q. Could we have on screen {PH0024/5}. This, I think, is
13 a slightly broken version of what you would have seen.
14 At that point did you know what the man was holding?
15 A. Yes.
16 Q. You knew this was a narwhal tusk?
17 A. Yes.
18 Q. How close was the man to you?
19 A. He was right next to me.
20 Q. What happened next?
21 A. He held out the narwhal tusk and I sort of took it at
22 the same time, so it just ended up in my possession.
23 Q. What was your intention to do with it?
24 A. Use it to either keep Usman at bay or just try and
25 disarm him somehow.

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1 Q. What did you then do with it?
2 A. I went into the foyer and approached Usman, so obviously
3 he knows now that I'm coming towards him. There's a bit
4 of to--ing and fro--ing, he starts swinging his knives and
5 then I -- I sort of tried to stab him in his chest,
6 right very high up on his chest, just below his neck,
7 and I hit him with some force, but it seemed to bounce
8 off. I wasn't sure whether he had something on
9 underneath, or whether he had taken something but either
10 way, the impact didn't seem to have as much effect as
11 what I thought it would, so he's then coming towards me
12 swinging his knives again, we're both trying to get
13 a better footing position to attack each other, and then
14 I managed to whack him with the narwhal tusk.
15 Q. Which part of him did you strike?
16 A. I think it was his shoulder, left shoulder.
17 Q. The image we have is you moving forward towards him,
18 striking at him. Him moving sometimes back towards you,
19 slashing with the knives; is that correct?
20 A. Yes, we're both jostling for position.
21 Q. Were you aware of anyone else on hand helping to fend
22 him off?
23 A. I wasn't aware of anyone else around me at the time, but
24 I was so focused on Usman if there was somebody there
25 it's quite possible I missed them.

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1 Q. What happened next in your engagement with him?
 2 A. Well, the narwhal tusk snapped and then obviously I was
 3 unarmed then, so it shattered, it landed on the floor,
 4 and then he come running towards me with his knives
 5 again, so I backed up pretty sharp, to the point that
 6 I actually ended up back on the stairway.
 7 Q. Back on the main stairway?
 8 A. Yes.
 9 Q. From that point, could you see anyone else around?
 10 A. Not that I noticed. Obviously I knew that Adam was
 11 still there with the young girl. I didn't notice
 12 anybody else at that time.
 13 Q. Your focus had obviously been on him?
 14 A. Yes.
 15 Q. So there may have been other people around to either
 16 side, as far as you know?
 17 A. Of course, yes.
 18 Q. What happened next in the encounter?
 19 A. So I — I just said to myself, you know, "Get back in
 20 there, what's the matter with you", so I went back into
 21 the foyer and by now there's somebody else seemed to be
 22 distracting him from the other doorway, had thrown
 23 something at him. So I picked up a chair and went to
 24 hit him with it, I just waited for the right moment
 25 until he was distracted, and then I just — I whacked

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1 him with a chair, I think it hit his shoulder and his
 2 head area.
 3 Q. Did that seem to have any effect?
 4 A. Not as much as what I thought it would have done.
 5 Q. Was this all happening in the entrance foyer?
 6 A. In the foyer, yes.
 7 Q. During any of this time, was Usman Khan saying anything?
 8 A. No.
 9 Q. You had struck him with the chair, apparently without
 10 very much effect. What then happened?
 11 A. So obviously I'm unarmed again now and so I back away
 12 and then he came towards me and he said, "I'm waiting
 13 for the police, I'm waiting for the police", twice.
 14 Q. You were at this point in a stand-off with him; is that
 15 right?
 16 A. Yes. But I did get the impression, maybe some of the
 17 strikes were having a slight effect on him.
 18 Q. What gave you that impression?
 19 A. He said "I'm waiting for the police". I think he wanted
 20 a bit of respite.
 21 Q. So whereas before he had been relentlessly coming on,
 22 now he was holding back a little?
 23 A. Yes, and the other reason was because he — as he came
 24 towards me I backed back out the door, he went to shut
 25 the door so I couldn't get in, and somebody else from

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1 next to me then came and pulled the door to, almost
 2 simultaneously.
 3 Q. At this point he was in the entrance hall, the doors
 4 were closed, the doors obviously had glass panels.
 5 A. Yes.
 6 Q. Could you see what was going on inside the entrance
 7 foyer over the next few seconds?
 8 A. Yes, well, for me I didn't think it was right to leave
 9 him, I just said to the kid next to me, "Don't let him
 10 rest", I didn't want to give him no thinking time. So
 11 I went back in, and within that space of time, he'd made
 12 his way over to the front door or the side door.
 13 I noticed a little interaction with him and a young
 14 black kid, something was going on, so by the time I'd
 15 gone back through that door, suddenly Usman had made his
 16 way out the front door.
 17 Q. As he got through the front door, what did you and
 18 others in the entrance foyer do?
 19 A. So I made my way over to the front door. Obviously
 20 there's people outside who were unaware of him, and
 21 I just said to the kid who was stood at the door,
 22 I said, "Move, there's people out there", so I just went
 23 out straight after him.
 24 Q. Just to be clear: why were you following him out of the
 25 main doors?

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1 A. Because the people are on the street, there was
 2 obviously people on the street who did not know about
 3 Usman. After seeing what he'd just done, there was
 4 a potential that he could just attack or kill or grab
 5 anybody, so I thought I'd best go out there and at least
 6 warn people as I chase him.
 7 Q. As you emerged onto the front steps, could you see where
 8 he was?
 9 A. He was down on the pavement.
 10 Q. He was down on the pavement?
 11 A. He was on the pavement, yes.
 12 Q. How far had he got?
 13 A. Not too far, but he seemed to be heading right towards
 14 London Bridge.
 15 Q. What did you then do?
 16 A. Well, I've seen some women walking towards him,
 17 obviously unaware, oblivious, so I shouted "Get back,
 18 he's a terrorist, get back, he's a terrorist", and
 19 started waving my arms, and of course they noticed him,
 20 heard me, noticed him and started to back away quite
 21 quickly.
 22 Q. Did you move forward? Did you move forward yourself?
 23 A. My memory goes a little bit blank. I just remember
 24 being back on the pavement, following him, and he — he
 25 seemed a bit frustrated by my efforts. He turned to

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1 face me and I vaguely remember having another
 2 interaction with him on the pavement. I tried to whack
 3 him, I think, or something happened with the narwhal
 4 tusk, but somehow that tusk ended up on the floor again
 5 and he then moved towards me, so I backed away again
 6 towards the steps.
 7 Q. If we put on screen {DC7421/31}, we will see a still of
 8 footage which the jury have seen. If we look over to
 9 the left of the image, those are, I think, your shoes
 10 and the bottoms of your trousers?
 11 A. Yes.
 12 Q. And Usman Khan is throwing a narwhal tusk back at you.
 13 A. Okay.
 14 Q. We saw in footage of this event that you had been
 15 engaging with him with the narwhal tusk and he grabbed
 16 it and threw it back.
 17 A. Okay.
 18 Q. But that's the period for which you have a hazy memory,
 19 is it?
 20 A. That's right, yes.
 21 Q. We can take that off screen now.
 22 You had, in any event, got quite close to him in
 23 that area at the bottom of the steps. After that
 24 altercation, which you understandably don't recall
 25 perfectly, where did he go?

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1 A. So he then set off, heading towards London Bridge.
 2 Q. At speed?
 3 A. I think so, I'm not quite certain. I just see him
 4 heading away. And I felt some cold spray at my hand,
 5 and that sort of brought me back to again, or at least
 6 my memory sort of picks up from that point. So
 7 I noticed the guy who gave me the narwhal tusk, he was
 8 on the pavement now and so was the guy with the fire
 9 extinguisher, both giving chase to Usman Khan, so
 10 I followed suit.
 11 Q. Had you been aware of the man with the fire extinguisher
 12 before that point?
 13 A. No.
 14 Q. So there were three of you: you, Mr Frost, as it turned
 15 out, with the narwhal tusk, and Mr Crilly, as it turned
 16 out, with the extinguisher, and you were all going after
 17 him, were you?
 18 A. Yes.
 19 Q. Did you move side-by-side or in a group?
 20 A. When I finally reached Usman Khan, I wasn't aware --
 21 I wasn't really focused on Darryn and John Crilly.
 22 I just had my mind focused on Usman Khan, just an image
 23 of him in my mind, so I wasn't really aware of them two
 24 around me at all, even though I'd seen them and I'd
 25 followed them, my main focus was on Usman.

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1 Q. If we put on screen a photograph of the area {PH0002/8}.
 2 That's an overview from the bottom of the steps, and we
 3 can follow the pavement with our eyes to where it turns
 4 into the bridge and crosses the river. We can see the
 5 area just beyond the steps where you had that
 6 engagement, and you said Usman Khan set off up the
 7 pavement; would that be towards those three
 8 lozenge-shaped barriers that we see along the pavement?
 9 A. Yes.
 10 Q. How close were you and the others following behind him
 11 by this point?
 12 A. Not too far behind, 5 -- 5, 6 metres.
 13 Q. As you got onto the bridge, were you gaining ground on
 14 him, or losing ground, or simply at the same distance?
 15 A. Yes, we'd caught up, and I think he had stopped and
 16 I think he was just possibly frustrated by our
 17 perseverance, because he turned to face us and I just
 18 said to myself: just grab him, you, know, why are we
 19 messing around here, let's just grab him, take him to
 20 the ground.
 21 Q. You have said that he stopped and turned. Did the three
 22 of you keep coming towards him?
 23 A. I just focused on what I was doing and I just had
 24 an image of him in front of me and I just remembered my
 25 hands going towards him.

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1 Q. Were you aware of anything happening before you grasped
 2 him?
 3 A. Just him turning round and refacing us.
 4 Q. If we put on screen {DC7421/32}, this is a still from
 5 CCTV footage of the incident, and we have seen that the
 6 sequence of events involved Mr Frost jabbing at
 7 Usman Khan with the narwhal tusk, and then almost
 8 immediately afterwards, while Mr Crilly was using the
 9 extinguisher, you launching yourself from the side --
 10 A. Mm--hm.
 11 Q. -- and grasping him. Is it right, based on what you've
 12 just told us, that you really weren't aware of what
 13 Mr Frost and Mr Crilly were doing; you were just focused
 14 on Khan?
 15 A. Obviously I was aware that they was around me, but their
 16 actions, I wasn't; yes, I was just focused on Khan, yes.
 17 Q. You saw your moment and you grasped it?
 18 A. That's right, yes.
 19 Q. How did you grab him?
 20 A. I grabbed his jacket. Two hands.
 21 Q. And how did you move him down?
 22 A. I just grabbed him and sort of tried to swing him round.
 23 Obviously I've seen footage since then. It was very
 24 quick, a lot of movement going on, but to me it just
 25 seemed like I grabbed him and somehow managed to take

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1 him to the floor with that grip.
 2 Q. Did you know at this point he still had his two knives?
 3 A. Yes.
 4 Q. You, of course, weren't armed, or wearing anything
 5 particularly protective?
 6 A. No.
 7 Q. What was in your mind as you went for him? What were
 8 you aiming to do?
 9 A. Well, I just knew that the best way at that point to
 10 deal with it was just to get him to the ground.
 11 Q. Were you successful in bringing him down?
 12 A. Yes.
 13 Q. Were you aware at that moment what the others were doing
 14 around you?
 15 A. Yes, I was aware that there were others there, so I just
 16 shouted "Grab his hands, grab his hands quick".
 17 Q. Did you keep hold of him on the ground?
 18 A. Yes. I mean, I think so. I knew he was down, I knew he
 19 was off balance, I knew he was in a relatively safe
 20 position. I knew we had a degree of control but I knew
 21 to get more control we needed to get more people on him,
 22 and that's why I shouted "Grab his hands".
 23 Q. What did you see or feel others doing around you?
 24 A. He seemed to be struggling, but I just made sure I put
 25 my weight on him in a way that he couldn't control his

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1 movement. I've done a little bit of wrestling and stuff
 2 like that, I know how to keep people pinned to the
 3 floor, so I had my weight held against him but keeping
 4 enough distance from my face without him being able to
 5 lash out with his knives.
 6 Q. Was he fighting back?
 7 A. He didn't seem to be lashing out, but I think everybody
 8 moved so quickly in trying to grab him, I don't think he
 9 had a lot of choice.
 10 Q. Were others simply holding him, or were others dealing
 11 with him in some other way?
 12 A. No, he was -- it was pretty much holding him and
 13 I believe others tried to set about trying to remove the
 14 knives.
 15 Q. Was anyone trying to hit or kick him?
 16 A. There was a point where somebody ran up and shouted
 17 "Give him a kicking!"
 18 Q. How did you respond to that?
 19 A. I said "No, don't hit him".
 20 Q. Why were you saying that?
 21 A. Because, you know, we had control, it weren't about
 22 hurting him, it was about controlling him, and we had
 23 control at the time, so.
 24 Q. It would only make it more difficult if people
 25 started hitting him?

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1 A. It would make it more difficult and we would lose
 2 control and you know if you start whacking people and
 3 they get free, he was obviously still a danger.
 4 Q. Did more people continue joining in the fray?
 5 A. Yes, other people, I've seen people jump out their cars
 6 once they realised what was going on, they came over,
 7 different pedestrians started getting involved and just,
 8 I think, taking hold and trying to remove knives and
 9 stuff like that.
 10 Q. Were you aware whether people were successful in
 11 removing the knives?
 12 A. No. There was a point where quite a few people got
 13 round him, I still had hold of him but I wasn't really
 14 so focused on the knives because at one point somehow,
 15 I don't know how, he managed to get back to his feet.
 16 Q. As he got back to his feet, what did you and the others
 17 do to regain control?
 18 A. Well, now he was back on his feet, he was obviously
 19 a bit more of a danger. I believed he still had the
 20 knives in his hands, he clearly still had that bomb
 21 strapped to his waist, so he was still a danger, so I --
 22 a gap opened up and I had an unobstructed view of his
 23 face, so I gave him a couple of upper cuts to the face,
 24 to the jaw area, and eventually he went back down again.
 25 Q. Do you think it was your upper cuts that brought him

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1 down?
 2 A. It wasn't long after that that he went down. It may
 3 have shocked him, I don't know, I don't know whether it
 4 was an instant reaction, but I think it may have helped
 5 just to stun him a little bit.
 6 Q. How long did this tussle or this melee go on?
 7 A. Well, he's now back on the ground and more people are
 8 involved now, he seems to be in a more secure and safe
 9 position.
 10 Q. What brought it to an end?
 11 A. At one point I've seen some officers jump out of their
 12 cars, jumping over the barrier, and shouting "Get back,
 13 move, get back!" So people started to peel off in
 14 different directions, mostly towards Fishmongers' Hall.
 15 Q. Did you remain holding him or did you move off?
 16 A. I remained for a while, I thought it was best just to
 17 let people peel off one by one, because I still had
 18 control of him, I still had a good grip on him. I felt
 19 it was safe at that time, so I let people peel away, and
 20 then with the officers shouting "Move, move, move",
 21 I waited for my moment.
 22 Q. If we look at {DC7421/38}, do we see the moment here
 23 where you're just getting off the attacker? We can see
 24 your purple jumper?
 25 A. Yes.

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1 Q. And then page 33 of the final file {DC7421/33}, do we
2 see there that Mr Frost remained holding Khan a little
3 longer than you did?
4 A. Yes.
5 Q. After you had got off, and while Mr Frost was still
6 holding on, did you do anything about removing Mr Frost?
7 A. Yes, I — Mr Frost continued to hold Usman Khan. The
8 officers are asking him to move, he wasn't letting go,
9 so I patted him on his back and said: "Come on, let's
10 go", and then tried to pull him, pull him off, but he
11 wouldn't move. So I just thought: I'm in the way now,
12 and I moved out the way myself.
13 Q. Could you hear anything else of what was going on
14 between the officers and Usman Khan?
15 A. No.
16 Q. As you moved away, where were you looking?
17 A. I looked towards Fishmongers' Hall, as I briefly moved
18 away.
19 Q. In that moment, could you hear what was going on behind
20 you, between the officers and Usman Khan?
21 A. No.
22 Q. What did you then do?
23 A. I just backed away and then looked back at the scene and
24 just watched it finish.
25 Q. How far were you away watching the scene?

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1 A. 2 or 3 metres.
2 Q. What did you see as the scene developed?
3 A. So Darryn eventually was pulled off, this was the chap
4 with the narwhal tusk, and then I heard some shots, and
5 then I turned and I saw Usman. I thought I'd seen him
6 reach to the — to his belt or to the middle of his
7 body, and then tried to get up, and then he was shot
8 again and tasered.
9 Q. You were aware of the officers opening fire, you think,
10 on two occasions?
11 A. Yes.
12 Q. How were those — how long was the gap between those two
13 occasions?
14 A. 4 or 5 seconds.
15 Q. Did you see the taser fired?
16 A. Yes.
17 Q. The way you've described it, the shots fired, or some of
18 the shots fired, took place after Usman had moved his
19 hands towards his waist.
20 A. Yes.
21 Q. What happened as a result of the shots?
22 A. Usman dropped back down again.
23 Q. Where did the officers then go?
24 A. Sorry, say that again?
25 Q. What did the officers then do or where did they go?

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1 A. Well, I think they remained in their same positions.
2 I'm not sure if they backed away a little bit.
3 Q. So they kept cover on him but may have backed away
4 a little?
5 A. Kept focus on him, yes.
6 Q. What did you do?
7 A. I started to back away myself.
8 Q. Did you say anything to the officers?
9 A. Yes, I realised there was people obviously injured
10 inside, they wasn't aware of that, so I said "There's
11 people in there injured, they need medical attention,
12 quick".
13 Q. Did you then return inside Fishmongers' Hall yourself?
14 A. Yes, I went back to Fishmongers' Hall. The door was
15 locked, I couldn't get back in, and there was a chap
16 stood on the doorway with a big slice on his shoulder,
17 so I, for some reason I tried to cover it up for him,
18 but the gash was so big and the tear was so big it was
19 pointless.
20 MR HOUGH: Now, I don't intend asking you further questions
21 from that point, you understand that the jury has heard
22 a lot of evidence about later events.
23 Those are all the questions I have for you at this
24 point, I'll just turn to see if others have questions.
25 I see that Mr Armstrong does.

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1 Questions by MR ARMSTRONG
2 MR ARMSTRONG: Thank you. Thank you, sir.
3 Mr Gallant, my name is Nick Armstrong and I ask
4 questions on behalf of Jack Merritt's family. I don't
5 intend to keep you long, and I don't intend to ask you,
6 as I did not with Mr Crilly, I don't intend to ask any
7 questions about the attack and your response to it, but
8 I do want to recognise and thank you for the bravery
9 that you showed on that day on behalf of Jack's family.
10 You were at Springhill at the time of this event,
11 and you had been there about seven weeks?
12 A. Yes.
13 Q. Springhill is a category D, also known as an open
14 prison?
15 A. Yes.
16 Q. Which is the lowest form of security?
17 A. Yes.
18 Q. And it happens to share a site with Grendon, but we
19 don't need to worry about that too much, but it's
20 a category D prison?
21 A. Yes.
22 Q. You encountered Learning Together, and you've spoken
23 highly of them, at Warren Hill.
24 A. That's true, yes.
25 Q. The jury may have heard reference to this, and they will

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1 hear more reference to it , that Learning Together starts
 2 at Grendon and gets rolled out to Warren Hill. Warren
 3 Hill is a category C prison, so one above Springhill.
 4 That suggests you were working your way down the
 5 security categories?
 6 A. That's true, yes.
 7 Q. Now, just so the jury understand this, and I don't think
 8 there's any difficulty with it, that is what long-term
 9 prisoners generally do: they work from category B
 10 sometimes, sometimes category A, and they work their way
 11 down, they are tested progressively in lower levels of
 12 security until they prove themselves and then they are
 13 released?
 14 A. Yes, as they reduce their risk, they are moved down the
 15 categories.
 16 Q. Sorry?
 17 A. As they reduce their risk.
 18 Q. As they reduce their risk?
 19 A. Yes.
 20 Q. I ask you that, there is no difficulty about this, we
 21 will hear that something quite different happened in
 22 relation to Mr Khan.
 23 Now, I just want to ask you another question about
 24 Warren Hill, because although Warren Hill is a -- it's
 25 not like Grendon, it's not entirely a therapeutic

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1 community, it's a very -- or it's certainly a slightly
 2 unusual prison, isn't it?
 3 A. Warren Hill?
 4 Q. Yes.
 5 A. It's -- the main part of Warren Hill is called the
 6 progression regime.
 7 Q. Yes.
 8 A. It's quite an open, relaxed environment inside a cat C
 9 prison.
 10 Q. Yes. I mean, I just want to put this to you: prisons
 11 are subject to inspections?
 12 A. Mm-hm.
 13 Q. The inspection for Warren Hill in 2019 said this:
 14 "It is far from a typical closed prison. It is
 15 unusual amongst category C closed prisons in that it is
 16 entirely dedicated to delivering a range of services in
 17 specialist environments to support long-term or complex
 18 prisoners towards progression into open conditions or
 19 for release into the community."
 20 So it's a specialist, progressive,
 21 progression-orientated regime, it has a therapeutic
 22 community within it?
 23 A. That's true.
 24 Q. It has something called a PIPE, which is
 25 a psychologically informed planned environment?

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1 A. Yes.
 2 Q. And it is for people who are getting a long way down the
 3 security conditions.
 4 A. Yes.
 5 Q. As you were then and then you went onto category D?
 6 A. Yes.
 7 Q. It is the opposite end of the spectrum from category A?
 8 A. Yes.
 9 MR ARMSTRONG: Thank you very much.
 10 JUDGE LUCRAFT: Thank you, Mr Rule.
 11 Questions by MR RULE
 12 MR RULE: Sir, I obviously apologise if I am blocking the
 13 view of any jurors, but I have to stay somewhere close
 14 to the microphone.
 15 JUDGE LUCRAFT: That's fine.
 16 MR RULE: Mr Gallant, my name is Mr Rule, I ask questions on
 17 behalf of the family of Saskia Jones, please. Very few
 18 questions, and some of which have been dealt with
 19 already by Mr Armstrong a moment ago.
 20 Your journey through the prison system, by the time
 21 we're talking about in November 2019, had been 14 and
 22 a half years or so; is that correct?
 23 A. That's true.
 24 Q. So a long period of time, during which you had been
 25 through the Warren Hill progressive prison that we've

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1 just been hearing about. You, I think, undertook
 2 educational courses, including a degree in business?
 3 A. Yes.
 4 Q. Was that Open University, the way of doing that?
 5 A. Yes.
 6 Q. So I'm not going to go into detail about all the
 7 opportunities for education in the prison but you got to
 8 degree level and you were studying for the degree, and
 9 I think you had a sort of tap on the shoulder from one
 10 of the custodial managers, one of the senior officers,
 11 saying: there's this new thing, Learning Together, would
 12 you apply for it, or think about applying for it, and
 13 you then did so?
 14 A. Yes.
 15 Q. So essentially you were picked out by the officer's
 16 encouragement, as someone who was already dedicated, you
 17 were doing well, and there was a limited number of
 18 places to join with Learning Together, and you were
 19 somebody who the officer hoped would take that up and
 20 you did?
 21 A. It was -- well, the tap on the shoulder was to go to
 22 a meeting rather than to actually join Learning
 23 Together, so it was like an open day meeting initially.
 24 Initially I was reluctant because I was busy, but
 25 I turned up anyway and felt inspired by what they had to

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1 offer, so yes, I applied.
 2 Q. Thank you. And you then studied with Learning Together
 3 inside the prison where you would have the study
 4 sessions, and then at the end of the course, there's
 5 also an end of course conference; is that right?
 6 A. That's right, yes.
 7 Q. That would also take place inside the prison, I believe
 8 in the chapel?
 9 A. Yes, the chapel and another room, which is --
 10 Q. For size reasons?
 11 A. Yes.
 12 Q. And that conference, the end of course and passing out
 13 ceremony type of event, that included external guests,
 14 didn't it? Not just the prisoners there, but also other
 15 people?
 16 A. Yes, that's true.
 17 Q. So those guests would come in, dignitaries, as well as
 18 the other students, et cetera, they would come inside to
 19 the prison again, so through the security into the
 20 prison environment?
 21 A. Yes.
 22 Q. And when you moved to Springhill, which we were just
 23 hearing about, category D, another word for that is open
 24 prison, isn't it?
 25 A. Yes.

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1 Q. And that's because the way in which that prison deals
 2 with prisoners is you've got through that process all
 3 the way down the categories you were telling us about to
 4 where you can be trusted, low enough risk, trusted in
 5 those conditions?
 6 A. Absolutely, yes.
 7 Q. So they are specifically -- the individuals housed in
 8 an open prison are those selected already by those risk
 9 assessments to be suitable for that environment?
 10 A. Of course, yes.
 11 Q. And it relies to an extent on trust rather than on four
 12 walls. It's not the sort of prison where it's security
 13 that keeps you in rather than an element of trust?
 14 A. From the risk assessment, yes, you are deemed to be safe
 15 enough to be in that category.
 16 Q. Thank you. Now, even in that category, you are already
 17 a trusted prisoner because you are there, there is
 18 a system, isn't there, in place for whether you are
 19 allowed to go out for the day or for an overnight stay
 20 or for a weekend stay, that type of thing?
 21 A. Yes.
 22 Q. That's called ROTL, release on temporary licence?
 23 A. Yes.
 24 Q. And your arrival at Springhill had been relatively
 25 recently, I think within weeks, before the

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1 Learning Together event, is that right?
 2 A. Yes.
 3 Q. So you were aware that there is ordinarily a policy for
 4 whether you are allowed out on a day release, that would
 5 mean you have to have a bedding in period. So you have
 6 been assessed at the closed prison to be suitable to
 7 move to open, then open prison wants to keep an eye on
 8 you, so there is a few months usually that pass during
 9 which you are assessed, your behaviour is assessed?
 10 A. It depends, I mean, some prisoners can be taken out
 11 after about three weeks. It all depends.
 12 Q. Right. It depends, but there is a general policy that
 13 you're aware of, isn't there, which involves a lay down
 14 period of certain months?
 15 A. Well, I don't know if there is a general policy, I'm not
 16 aware of it, because I know that some people go there
 17 and they can be out within three weeks, so...
 18 Q. All right. Let me just look at your witness statement,
 19 on page 5 of the witness statement that you have
 20 provided, which is dated 5 December. I presume it's the
 21 document you have there that you've looked at. Okay.
 22 So what you have said there was:
 23 "Normally, I would not have been permitted to attend
 24 this event because when you first arrive at a category D
 25 prison you have to wait a certain period of time before

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1 you are allowed to go out for what is called RDR,
 2 (Resettlement Day Release)..."
 3 That's correct, isn't it?
 4 A. Yes.
 5 Q. "However, there was a possibility that I could perhaps
 6 attend this event [talking about 29 November] with
 7 an escorting officer."
 8 You didn't really expect to get the opportunity but
 9 you applied for it anyway just in case?
 10 A. That's true, yes.
 11 Q. I'm reading your own words to you.
 12 A. That's fine, yes. I get that I said that, thank you.
 13 Q. And you had been there for seven weeks?
 14 A. Yes.
 15 Q. So you were not hopeful because of the policy that you
 16 can't remember the details of --
 17 A. It wasn't a policy, it was more the distance and the
 18 event itself, so people can and very often do leave that
 19 prison within the first three weeks, if they go to
 20 a local town, for example, so it's not unusual in that
 21 circumstance. It's probably the distance which I was
 22 travelling which I was very doubtful about.
 23 Q. All right. There is a policy, but I'm not going to deal
 24 with it with you, I'll deal with it with prison
 25 officers. Your statement had suggested you were aware

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1 of it, but that's okay.
 2 So in the course of that application, you applied in
 3 a "just in case basis" and what happened with the board
 4 initially ?
 5 A. The board?
 6 Q. The board who decide on the ROTL application for whether
 7 you're allowed to go or not?
 8 A. I don't know whether there was a board, but there was
 9 an application put in and it was rejected by the head of
 10 OMU.
 11 Q. Thank you. Again, your witness statement had said:
 12 "I had to be boarded where my application went in
 13 front of a board within the prison. That was rejected".
 14 But you may have been told by the offender
 15 management unit supervisor?
 16 A. I mean, that might have been the case, but, yes, I'm not
 17 sure whether it was actually the official board, yes.
 18 Q. It's fine. The statement was from closer to the time so
 19 it may be just something that's more familiar for you
 20 then than it is now, I'm not trying to catch you out on
 21 it --
 22 A. I know.
 23 Q. -- I just want to get the detail before the jury so they
 24 understand what the system is?
 25 A. Okay.

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1 Q. So the system was that the decision is taken on the risk
 2 assessment of the ROTL board. It was a rejection,
 3 unfortunately, however, when you informed Amy Ludlow of
 4 Learning Together that you had been refused, she offered
 5 to make further enquiries on your behalf?
 6 A. Yes.
 7 Q. You said -- you emailed her back, said it's unlikely the
 8 prison would change its mind, she said to leave it with
 9 her.
 10 A. Something like that, yes.
 11 Q. Okay, that's what's in your statement.
 12 A. Yes.
 13 Q. "The next day, a prison officer approached me and told
 14 me I was now going to London the following week ... for
 15 the ... event."
 16 A. Mm.
 17 Q. So that's just the system at work, and although you'd
 18 been refused, Amy was able to assist with that, and
 19 behind the scenes some strings had been pulled and you
 20 were able to attend, which is, frankly, good, bearing in
 21 mind the heroic actions that you performed on the day
 22 and the lives that you no doubt helped to save, but the
 23 process is there in your statement, so thank you for
 24 helping me to put that in front of the jury.
 25 Then another point which you have mentioned in the

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1 statement was, just on your arrival at the event,
 2 I think you were very familiar with both Amy and
 3 Mr Merritt, Jack Merritt, who was one of the people
 4 sadly killed .
 5 A. Mm--hm.
 6 Q. And you were greeted with a hug, there was an element --
 7 A. Yes.
 8 Q. -- of familiarity between yourselves?
 9 A. Yes.
 10 Q. That's with Amy and then with Jack.
 11 The last point I would like to leave you with is
 12 also from your statement, Mr Gallant, and something
 13 which you said towards the end of that statement on
 14 page 22, where you said that what you did on the day was
 15 instinctive, and you're glad you did what you did and
 16 you'd do it again tomorrow if you had the chance,
 17 because people like that, meaning Khan, are cowards.
 18 That was what you said in your statement. I presume
 19 that's still your view of that man?
 20 A. Yes.
 21 MR RULE: Thank you very much, Mr Gallant.
 22 JUDGE LUCRAFT: Thank you very much, Mr Rule.
 23 I don't think, Mr Hough, there are any other
 24 questions for --
 25 MR HOUGH: Mr Gallant, thank you very much for your

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1 evidence.
 2 A. Thank you very much.
 3 JUDGE LUCRAFT: Mr Gallant, just before you go, can I just
 4 echo the sentiments which have been expressed for what
 5 you did on the day. Your name is Gallant, and your
 6 actions on that day perhaps do not belie your name, but
 7 thank you for what you did.
 8 A. Thank you, sir.
 9 MR HOUGH: Sir, the next witness is Charles Morgan.
 10 MR CHARLES MORGAN (sworn)
 11 JUDGE LUCRAFT: Thank you very much, Mr Morgan. If you wish
 12 to sit, there's a chair by your side, or you can stand,
 13 whichever you feel most comfortable.
 14 A. Stand.
 15 JUDGE LUCRAFT: And the microphone will help to amplify your
 16 voice, so if you speak in a nice loud clear voice we
 17 will hear what it is you have to say. You might be
 18 shown some images or some plans, those will appear on
 19 the small screen to your side or on the large screen to
 20 this side; okay?
 21 A. Yes sir.
 22 Questions by MR HOUGH QC
 23 MR HOUGH: Would you please give your full name for the
 24 court record?
 25 A. I'm Charles Kojo(?) Morgan.

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1 Q. Mr Morgan, you know that I'm asking you questions first
 2 on behalf of the Coroner, and you may then have some
 3 questions from other lawyers.
 4 A. Repeat again, sir?
 5 Q. You understand that I'm asking you questions first on
 6 behalf of the Coroner?
 7 A. Yes, please.
 8 Q. You made a witness statement on 30 November 2019, and
 9 we'll go to that if we need to.
 10 A. Yes, sir.
 11 Q. On 29 November 2019, were you in the area of
 12 London Bridge in the early afternoon just before
 13 2.00 pm?
 14 A. Yes.
 15 Q. Had you taken a bus across the bridge going from the
 16 south side to the north side?
 17 A. Yes, sir.
 18 Q. If we put on screen a photograph, {PH0002/25}, do we see
 19 on the left-hand side the carriageway your bus had come
 20 up, the direction you had come?
 21 A. I was coming on the left-hand side where the bus was
 22 coming up.
 23 Q. Yes. And if we put on screen {PH0002/6}, we'll see
 24 another photograph. We can see a bus stop just outside
 25 Fishmongers' Hall. First of all, were you travelling on

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1 the bottom deck of the bus?
 2 A. I was walking.
 3 Q. Where did you get off the bus?
 4 A. Close by the station end.
 5 Q. So near the bus stop that we see on the photograph?
 6 A. No.
 7 Q. Where did you get off the bus?
 8 A. By London Bridge station.
 9 Q. By London Bridge station.
 10 A. Yes. Down, and I was walking -- I was walking
 11 towards -- forward.
 12 Q. Let's take the photograph that we were looking at
 13 before, {PH0002/25}. Did you cross the bridge?
 14 A. Yes.
 15 Q. Did you cross the bridge on foot or in a bus?
 16 A. On foot.
 17 Q. Did you go on the left-hand pavement or the right-hand
 18 pavement?
 19 A. On the left-hand.
 20 Q. Where did you reach when something happened which caught
 21 your attention?
 22 A. Just -- I just passed the pub(?) when the incident
 23 happened.
 24 Q. You just passed where?
 25 A. The Fish.

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1 Q. So you had just walked past Fishmongers' Hall --
 2 A. Yes.
 3 Q. -- when an incident happened?
 4 A. Yes.
 5 Q. Let's go back to that photograph of the area outside
 6 Fishmongers' Hall, {PH0002/6}. So had you got beyond
 7 the steps to the north side of the steps near the bus
 8 stop?
 9 A. Around that side there.
 10 Q. Which side?
 11 A. Close by the bus stop.
 12 Q. So you were near the bus stop?
 13 A. Yes.
 14 Q. And what happened to catch your attention?
 15 A. Someone was shouting from the Fish[mongers'] side, was
 16 saying "oh, someone just stabbed someone, just stabbed
 17 someone", yes, and I turned around.
 18 Q. So you heard a shout from behind you that somebody had
 19 stabbed someone?
 20 A. Yes, sir.
 21 Q. And that caused you to turn around?
 22 A. Yes.
 23 Q. What could you see when you turned around?
 24 A. I saw the guy with the two knives in his hands.
 25 Q. Where was he?

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1 A. Say again?
 2 Q. Where was he? Where was the man with two knives?
 3 A. On the left-hand side.
 4 Q. Was he near the entrance to the building?
 5 A. He's just come off the building, holding the two knives
 6 like -- he was like (indicates), he was facing me, so
 7 when I saw him I just, like, there -- I just picked like
 8 a stick, so when I was running towards him I just picked
 9 like a stick that was front -- in front of me, I picked
 10 the stick for help.
 11 Q. Okay, let's take this in stages. You turned around, you
 12 saw a man with two knives who had come out of the
 13 building, you saw that he was faced towards you.
 14 A. Yes, sir.
 15 Q. And you picked up a stick to use against him?
 16 A. Yes, sir.
 17 Q. Had the stick been on the pavement?
 18 A. Say again?
 19 Q. Was the stick on the pavement?
 20 A. It was on the pavement, sir.
 21 Q. What sort of stick was it?
 22 A. It was a wooden stick.
 23 Q. What colour was it?
 24 A. A colour like this (indicates).
 25 Q. Can we put on screen an image {PH0024/5}, that's

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1 an image of what we know to be a narwhal tusk. Was it
 2 a stick like that that you picked up, or was it
 3 something different in appearance?
 4 A. It was a flat stick, yes.
 5 Q. How long was it? How tall was it? How long was the
 6 stick?
 7 A. It was —
 8 JUDGE LUCRAFT: Use your hands if it's easier.
 9 MR HOUGH: Use your hands.
 10 JUDGE LUCRAFT: To show how long it is.
 11 A. Like something like that (indicates).
 12 MR HOUGH: About a metre and a half?
 13 A. I'm sure.
 14 Q. After you had picked up the stick, what did you do?
 15 A. It was like, he was holding a knife, so I was facing
 16 him, and some white man come from the back and hit him
 17 with his feet, so he drop on the floor.
 18 Q. So you saw somebody approach the man with the knives?
 19 A. From the back side.
 20 Q. From the rear?
 21 A. Yes.
 22 Q. You saw him strike the man?
 23 A. And hit him with his feet, and he's dropped on the
 24 floor, and I put the stick down to go and grab him by
 25 his hands, so they try to take the knife off him.

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1 Q. Were you successful in taking the knife off him? Did
 2 you manage to take the knife off him?
 3 A. Yes, because there was a lot, like four, five people.
 4 Q. So lots of people were piling on by this stage?
 5 A. Around four, five people.
 6 Q. Did you remove one knife from him?
 7 A. Say again, sir?
 8 Q. Did you remove one knife from him?
 9 A. Yes, we — it was not only me, it was like four or five
 10 people.
 11 Q. He had been holding two knives?
 12 A. Yes.
 13 Q. Did you get one of them off him? Did you yourself get
 14 one of them off him?
 15 A. No, because when he dropped on the floor, like he was on
 16 the floor, I tried to grab the hand, yes, and some old
 17 white man take the knife off him.
 18 Q. What happened next?
 19 A. Next. So when the police come, the police were saying
 20 "Get back, get back, get back", so everybody was trying
 21 to get back off him.
 22 Q. Did you get back off him?
 23 A. Yes. Because the police — the police arrived. The
 24 police said "Get back, get back, everyone get back".
 25 Q. How many police officers were there?

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1 A. Two.
 2 Q. Did they have guns?
 3 A. Yes.
 4 Q. How far did you move back?
 5 A. Like the distance from here to the wall over there.
 6 Q. You're gesturing maybe 20 yards or so?
 7 A. Around that.
 8 Q. 10–20 yards?
 9 A. Yes.
 10 Q. Could you see what was going on around the man as you
 11 moved to that distance?
 12 A. Yes, so when I moved back, I hear the police say, "Get
 13 back, get back, he have a bomb, he have a bomb on him",
 14 so when everybody heard "bomb", everybody just get back
 15 before the police used the tracer on him, because the
 16 first shot, it was a tracer.
 17 Q. So the first shot that you saw was a taser that was
 18 fired at him?
 19 A. Yes. Yes. And when they shot him and he tried to get
 20 up, and the police are like "Oh, he have a bomb,
 21 everybody get back", so that's why the police shot him.
 22 Q. So just to get the sequence right, you had moved some
 23 distance away, you saw a taser fired at him.
 24 A. Yes.
 25 Q. You saw him continue to move?

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1 A. Yes.
 2 Q. And then you were aware of gunshots being fired at him?
 3 A. Yes, sir.
 4 Q. Could you see what effect the gunshots had?
 5 A. Say again?
 6 Q. What effect did the gunshots have? What did they do to
 7 him?
 8 A. What did they do to him?
 9 Q. How did they move when he was shot?
 10 A. Because he was on the floor, when the police used the
 11 taser on him, and, like, shock, to try to cut off any
 12 police, so like he have a bomb on him, and the police
 13 said "Oh, he have a bomb, he have a bomb, he have
 14 a bomb, everybody get back", yes, before the police shot
 15 him.
 16 Q. Did he stop moving after he had been shot?
 17 A. No.
 18 Q. Did you then make your way away from the scene?
 19 A. Say again, sir?
 20 Q. Did you then move away from the scene?
 21 A. Yes.
 22 MR HOUGH: Thank you very much, Mr Morgan. Those are the
 23 questions I have for you, I will look to see if others
 24 have any questions.
 25 I see not. Thank you very much for giving your

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1 evidence.
 2 JUDGE LUCRAFT: Thank you very much for coming, Mr Morgan,
 3 and thank you for going to where there was obvious
 4 danger. Thank you for what you did.
 5 A. Welcome, sir.
 6 MR HOUGH: Sir, would it be convenient to have our break?
 7 JUDGE LUCRAFT: We will take our mid-afternoon break there,
 8 Mr Hough. Thank you.
 9 (In the absence of the jury)
 10 I'll rise.
 11 (3.00 pm)
 12 (A short break)
 13 (3.17 pm)
 14 (In the presence of the jury)
 15 MR HOUGH: Sir, the next witness is Jeremy Meek.
 16 JUDGE LUCRAFT: Thank you.
 17 DC JEREMY MEEK (sworn)
 18 JUDGE LUCRAFT: Good afternoon, officer. If you wish to
 19 take a seat, there's a seat by your side. Either sit or
 20 stand, whichever you prefer.
 21 A. I'm fine standing, thank you, sir.
 22 JUDGE LUCRAFT: Thank you.
 23 Questions by MR HOUGH QC
 24 MR HOUGH: Would you please give your full name for the
 25 court?

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1 A. It's Jeremy Paul Meek.
 2 Q. Mr Meek, I'm asking you questions first on behalf of the
 3 Coroner, you may then have some questions from other
 4 lawyers. You made a witness statement about matters
 5 we're concerned with on 3 December 2019, and we may
 6 refer to that as necessary.
 7 A. Thank you.
 8 Q. What was your occupation in November 2019?
 9 A. I'm a detective constable with the British Transport
 10 Police.
 11 Q. On 29 November 2019, just before 2.00 pm, where were
 12 you?
 13 A. I was making my way from court, I'd been to court that
 14 morning, and was walking back towards London Bridge.
 15 Q. We can put on screen a photograph, an aerial view,
 16 {PH0002/24}. We can see there a view looking north over
 17 London Bridge from a position about halfway over the
 18 bridge. On which side of the bridge were you walking?
 19 A. Yes, I was on the offside pavement, which is the
 20 right-hand side, the eastern section.
 21 Q. You were walking from the south side to the north side?
 22 A. That's correct, yes.
 23 Q. Where had you reached on the pavement when you heard or
 24 saw something from the other side?
 25 A. Around the area, if you can see where the -- there's

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1 some cars parked on the right-hand side, I was around
 2 that sort of area, but obviously at the top.
 3 Q. If we put on screen page 26 of the same file,
 4 {PH0002/26}, had you reached a point on the right-hand
 5 side of this photograph?
 6 A. I had. I was -- you've got the black barriers, I was
 7 this side of the black barriers, so further south.
 8 Q. What did you first see or hear?
 9 A. I was facing away from the Fishmongers' Hall, and
 10 I heard a commotion behind me.
 11 Q. Did you look round?
 12 A. I'm sorry?
 13 Q. Did you look round?
 14 A. Yes, I did, yes. I have been to that hall before, and
 15 as I looked around, I could see people on the top stairs
 16 of the hall running out of it and turning right to run
 17 south down the bridge.
 18 Q. How many people?
 19 A. I saw a group of, I thought four or five males, chasing
 20 one other male.
 21 Q. Did you notice anything else about them other than that
 22 there were that number of men chasing another man?
 23 A. One of the men had possession of a fire extinguisher
 24 which he used in the stair area.
 25 Q. Did you notice anything about the man being chased?

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1 A. Basically, once I had seen them come out of the -- or
 2 come down the steps and carry on chasing, I felt then
 3 that I had to make my way across so what I did was,
 4 coming from my side of the pavement, coming towards
 5 where the men were chasing the one male, I was making my
 6 way across, so I saw them chasing after him.
 7 Q. What did you think was happening?
 8 A. I wasn't too sure, but as I started to make my way
 9 across, I saw the leading male, Mr Khan, he was in front
 10 of the other males. I could see that he was -- he had
 11 bulk to his top half, and I could see that there was
 12 some kind of objects in his hands, which I took to be
 13 weapons.
 14 Q. You say you were making your way from your side of
 15 the road across to the side where the men were. Did you
 16 set off from north of the black barriers or south of
 17 them?
 18 A. I believe it was south of the black barriers, I may be
 19 incorrect about that, it may be just after the black
 20 barriers where I was stood, but around that area.
 21 Q. Did you have to step over barriers at the side of
 22 the road?
 23 A. Yes, there's traffic barriers that run the length of the
 24 bridge, I had to negotiate those barriers, as well as
 25 negotiate the traffic as well.

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1 Q. So did that take your attention as you were going across
2 the road, negotiating first of all the barriers and then
3 the traffic ?
4 A. Absolutely, yes. Obviously I wanted to get across
5 there, but I also wanted to get across there safely .
6 Q. Where were you when you realised from looking up that
7 the man at the head of the group had something that
8 appeared to be weapons?
9 A. It 's as he was running and was in front of the group
10 that were chasing him.
11 Q. Was that before you set off across the road or as you --
12 A. No, that's as I'm going across, and also as I'm coming
13 across, I heard the gentleman who I now know to be
14 Mr Crilly, who had the fire extinguisher, he shouted out
15 "He's just killed two women inside."
16 Q. Did you reach the pavement on the far side of the road
17 from where you had started?
18 A. I did, yes.
19 Q. When you got there, what was the scene?
20 A. As I was coming across, again, I've had to negotiate the
21 barrier that separates the pavement from the road, and
22 as I've come across there, by this time the chasing
23 group have got hold of Mr Khan and they've wrestled him
24 to the floor .
25 Q. Where was that taking place?

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1 A. In the area where that tent is shown on the picture.
2 Q. So the area of the lower of the blue tents?
3 A. That's correct, yes.
4 Q. Just on the bridge, where the bridge has just begun to
5 cross the water?
6 A. That's correct .
7 Q. You say the men had caught up with him; what were they
8 doing with Khan at that point?
9 A. As they have caught up with him and brought him down,
10 there was just a sort of pile on, so the group and
11 others appeared to be putting pressure on him to keep
12 him from not moving and keeping him still under the mass
13 of bodies.
14 Q. You are telling us that the men who had chased him had
15 piled on top of him by now?
16 A. Yes.
17 Q. And that others were coming and joining in?
18 A. Yes. Yes. I mean, as I say, I had seen the bulk of
19 that person as he was running, and as I got closer to
20 him, his jacket or his top appeared as if it had some
21 sort of compartments.
22 Q. How close did you get?
23 A. I was right next to him, I was in front of him, so he's
24 facing forwards, he's being held down, his two arms are
25 held out in front of him, but they had feet on them to

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1 actually hold them in position so he couldn't move them.
2 Q. Was he carrying anything in his hands at that point?
3 A. He had two knives in his hands, one in each hand.
4 Q. As you looked more closely, what could you see of his
5 upper body?
6 A. I could see he was sweating, I could see he had short
7 hair, I could see lines or compartments, that is what
8 I thought, and I thought that to be a suicide vest or
9 a bomb vest.
10 Q. You say he was still holding onto the knives; as far as
11 you could see, was there anything connecting the knives
12 to him?
13 A. I couldn't see it, I could just see that they were in
14 his hands. As I say, they were held out in front of him
15 but the blades were pointing upwards.
16 Q. What did you then do?
17 A. I then got into position, I was looking at his left hand
18 to start with and observing the knife, and realised that
19 my left leg was actually very close to his right hand
20 which also had a knife in it, and it was at that point
21 that I sort of crouched down to where that knife was.
22 The people were shouting "Get the knives, get the
23 knives!"
24 Q. And did you do anything about removing the knives?
25 A. Yes, so as I've crouched down, I've grabbed hold of

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1 Mr Khan's fingers and prised open his hand and took the
2 knife out of his hand and took it in my right hand.
3 Now, I didn't feel any resistance. As far as I was
4 concerned, it wasn't taped up to him at all, this
5 particular knife came out reasonably easy and I took it,
6 and took possession of it .
7 Q. As you pulled the knife away, were you aware what was
8 happening around you?
9 A. I was aware that obviously the males were still on him,
10 there was lots of shouting, and what actually happened
11 is as I went to stand up I became aware of a police
12 vehicle which had turned up, so there was blue lights,
13 there was sirens, and then officers had obviously got
14 out, and actually as I stood up, I saw an officer
15 running towards me with a machine gun in front of them.
16 Q. How close were you to Khan, the attacker, at this point?
17 A. I was still right next to him, just in front of him.
18 Q. Did the officers approach?
19 A. They did, yes.
20 Q. What did you do as the officers approached?
21 A. Well, as I say, they were shouting. I can't exactly
22 recall, they were words of, really, just "Clear the
23 area, get out, get away, get away", and so I moved away
24 from Mr Khan and the group with the knife in my hand,
25 and went onto the pavement towards the wall nearest the

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1 river .
 2 Q. Did you move north or south in relation to the view
 3 we're seeing now, or did you stay at the same level?
 4 A. No, I started to move south. As I say, as far as I was
 5 concerned, I had seen a person wearing a bomb vest, and
 6 then I — when I did look back, I saw an officer point,
 7 he was in front of Khan, he was pointing the gun towards
 8 him, and I heard the shout "Bomb".
 9 Q. At this point were you still moving? Were you still
 10 moving south?
 11 A. I was still moving, yes, sir .
 12 Q. Were you walking? Running?
 13 A. I was walking, but I was aware that I was now in
 14 possession of this knife, and obviously the calls that
 15 would have been made is for a person with a knife, and
 16 my concern at that point was to do something about the
 17 knife that I had.
 18 Q. What did you do with it?
 19 A. Well, I remembered that I'd got a pair of gloves in my
 20 pocket, so I — actually, I reached into my pocket, had
 21 a pair of leather gloves, and I pulled out the gloves
 22 and I put one glove on each end of the knife to cover it
 23 completely, and then I held it in my left hand. So
 24 I was happy that any officers that may come afterwards
 25 wouldn't obviously see me walking down the road with the

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1 knife visible , and it was now concealed.
 2 Q. Because it wouldn't be the safest thing to be in the
 3 centre of a developing terrorist situation holding
 4 a knife in public?
 5 A. That was my thinking, yes.
 6 Q. As you were moving away and starting to think about this
 7 knife, were you at all looking back to see what was
 8 happening behind you?
 9 A. I was, yes.
 10 Q. Could you see what was happening?
 11 A. I could see. I mean, actually, before I actually put
 12 the knife in the — into the gloves, I'd heard that
 13 shout "Bomb", and then shortly afterwards I heard
 14 a shot.
 15 Q. Were you looking at the scene and the officers when the
 16 shot was fired?
 17 A. No.
 18 Q. Did you see anything of the movements of the attacker in
 19 the moments before the shots were fired?
 20 A. No.
 21 Q. Did you continue moving south and leave the scene?
 22 A. I did, yes.
 23 Q. If we put on screen {DC7421/40}, and if we look at the
 24 lower image, please, can we see an image of you moving
 25 away with the knife in the midst of that scene?

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1 A. That's me, yes.
 2 Q. After you had left the scene, did you later provide the
 3 knife as a piece of evidence, still in the gloves, to
 4 colleagues at British Transport Police?
 5 A. I did, yes.
 6 MR HOUGH: Thank you very much. Those are the questions
 7 I have at this stage. I'll see if anybody else has any.
 8 A. Thank you.
 9 MR HOUGH: I see not.
 10 Thank you very much for your evidence.
 11 JUDGE LUCRAFT: Thank you very much indeed. Officer, you
 12 were, as you mentioned, you had been at court dealing
 13 with something connected with your work as
 14 an investigator for British Transport Police, you had
 15 come across this most unexpectedly as you were making
 16 your way from court, and thank you very much for what
 17 you did, and obviously taking that knife away was a very
 18 important thing to do. Thank you.
 19 A. Thank you, sir.
 20 May I extend my condolences to the families of
 21 Saskia and Jack.
 22 JUDGE LUCRAFT: Thank you very much, officer.
 23 A. Thank you.
 24 MR HOUGH: Sir, the final live witness today is
 25 Desmond Bockarie.

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1 JUDGE LUCRAFT: Thank you.
 2 MR DESMOND BOCKARIE (sworn)
 3 JUDGE LUCRAFT: Good afternoon, Mr Bockarie. If you are
 4 happy to, please do remove your mask for giving
 5 evidence. If you want to keep it on, that's a matter
 6 for you.
 7 A. It's better for me to take it.
 8 JUDGE LUCRAFT: And the microphone in front of you,
 9 Mr Bockarie, will help to amplify your voice.
 10 A. Okay.
 11 JUDGE LUCRAFT: So we can all hear what it is you have to
 12 say.
 13 A. Thank you.
 14 JUDGE LUCRAFT: If you want to take a seat, there's a seat
 15 by the side. I'm happy for you to sit or stand,
 16 whichever you feel most comfortable doing.
 17 A. I think I rather sit .
 18 JUDGE LUCRAFT: You can sit by all means, please do. If you
 19 want to take the mask off whilst you are in here, that's
 20 fine with me.
 21 Questions by MR HOUGH QC
 22 MR HOUGH: Would you please give your full name for the
 23 court?
 24 A. My name is Desmond Saa(?) Bockarie.
 25 Q. Mr Bockarie, you know that I'm asking you questions

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1 first on behalf of the Coroner, and it's possible you
 2 may have some questions from others. Your witness
 3 statement about these matters was made on
 4 8 December 2019, and we'll refer to that if we need to.
 5 In November 2019, what did you do for a job?
 6 A. I drive -- I continue to drive as an Uber driver,
 7 I'm a driver, taxi driver for Uber.
 8 Q. An Uber taxi driver driving, I think, a silver VW
 9 Sharan?
 10 A. At the time, yes.
 11 Q. Just before 2.00 pm on 29 November 2019, were you at
 12 work in the London Bridge area?
 13 A. Yes, I was.
 14 Q. Is it right that you had just dropped a fare at
 15 London Bridge train station and picked up a new
 16 passenger who wanted to travel north?
 17 A. Yes.
 18 Q. After the event I think you told the police that the
 19 fare request for the new passenger was made at 13.56,
 20 1.56 pm?
 21 A. Exactly.
 22 Q. Did your route from there take you north over
 23 London Bridge?
 24 A. Well, the postcode, according to the request I received,
 25 was EC2, so I was going north -- I was coming from the

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1 south side of the bridge, I was going to the north side
 2 of the bridge.
 3 Q. If we put on screen a photograph, {PH0002/23}, were you
 4 travelling in the carriageway that we see on the left
 5 where we see the two buses?
 6 A. Yes, please.
 7 Q. Now we can see in that carriageway that there was a bus
 8 lane, and then two lanes for traffic. Which lane were
 9 you driving in?
 10 A. I was on the inside lane, this silver car, where the
 11 first bus is, that's my silver vehicle, the silver car
 12 there, the VW Sharan, there.
 13 Q. So if we look at the first -- the bus that's further
 14 north, around the middle of the photograph, you were in
 15 the lane two to the side of that, the third lane?
 16 A. Yes, the top.
 17 Q. And you were in the position of the silver car that we
 18 see near that bus?
 19 A. Yes.
 20 Q. How was the traffic moving?
 21 A. Sorry?
 22 Q. How was the traffic moving? Fast, slow?
 23 A. Well, it was moving very slowly at the time. I think
 24 the day was on Friday, it was moving very slowly. I was
 25 thinking maybe it could have been because of the traffic

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1 lights at the end.
 2 Q. How far had you reached when you saw some striking
 3 events on the pavement next to you?
 4 A. Roughly about 25--30 metres or so.
 5 Q. 5--30 metres?
 6 A. No, 25--30 metres away from the incident.
 7 Q. And where was your vehicle in the scene that we're
 8 looking at?
 9 A. On this photograph, are you telling me about the
 10 photograph now?
 11 Q. I'm asking you where your vehicle had reached when you
 12 started to see things?
 13 A. Well, initially before I actually stopped, when I was --
 14 I was still driving, the car was still in motion, and
 15 I'd got the passenger in my car, I saw people running
 16 away from the incident, but I was still driving, but the
 17 car was moving at this time, so I saw people running
 18 away like three, four, five people running away, and at
 19 the time I just told the guy who was sitting in my car
 20 saying: someone is chasing some people, but I was not
 21 too sure exactly at the time whether he was having
 22 a knife, until when I saw -- when I moved a little bit
 23 further, then I saw that he was actually holding a knife
 24 in his hand.
 25 Q. So you were driving forward slowly, and you could see

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1 a man who caught your attention and after a short while
 2 of looking at him, you saw that he was carrying one or
 3 more knives?
 4 A. Well, people were shouting, they were running away from
 5 him, like a lot of people, like maybe, as I said
 6 earlier, about three or four people running away, they
 7 were shouting, like running with speed for their lives,
 8 and I could see this guy chasing them with a knife, he
 9 was actually carrying a knife at the time.
 10 Q. Now, you're holding your hand as though the knife is
 11 held up at his head; is that right?
 12 A. He was, he was carrying a knife, he was holding it like
 13 he really mean to stab people.
 14 Q. So at head height with the blade angled downwards?
 15 A. It was head high.
 16 Q. Did you tell your passenger what was going on?
 17 A. Sorry?
 18 Q. Did you speak to your passenger about what was going on?
 19 A. Yes, I did. Yes, I did. I just draw his attention,
 20 I said: something is happening there, someone is chasing
 21 some people and he seems like he's carrying a knife.
 22 Q. Did you then see any other people near the attacker?
 23 A. Yes, there were other people chasing him. It's like
 24 people were running away from him, he was chasing those
 25 people who were running away from him, and there were

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1 other people chasing him as well.
 2 Q. How many people were chasing the attacker?
 3 A. At the time I saw three people, one of them was holding
 4 an extinguisher, another one was holding like a pole,
 5 like a stick or a pole, and another person, I don't
 6 think the other man carried anything, but those two were
 7 carrying — one of them was holding a fire extinguisher
 8 and another one was holding a pole.
 9 Q. How close did they get to the attacker?
 10 A. Well, he was actually trying to — after he tried to
 11 chase those people who were running away from him, and
 12 he couldn't get them, that was the time he turned back,
 13 because they were following him and those other people
 14 are running away from him, he couldn't get them, and
 15 then he turned back to attack those people who were
 16 chasing him, so they were very close to each other at
 17 the time.
 18 Q. Where on the pavement was the attacker when he turned to
 19 confront the people who had been chasing him?
 20 A. It's on the north side of the river, because I was
 21 coming from the south, so it's on the north side, on the
 22 west side of the north side of the river, on the left
 23 side.
 24 Q. How far from your vehicle was all this happening?
 25 A. Roughly about 25 metres to 30 metres or so.

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1 Q. Did you have an unobstructed view, or was there anything
 2 in your way?
 3 A. No, at the time it was just — I could see everything,
 4 I could see everything at the time.
 5 Q. If we put on screen {DC7421/35}, we will see a still
 6 from some CCTV footage, looking at the confrontation
 7 from across the road. Would your vehicle have been in
 8 the queue of traffic that we see on this photograph?
 9 A. Yes, because what happened, it was like two lanes, and
 10 the bus lane, so those other vehicles on the other lane,
 11 they start to move into the other — because of the
 12 incident, they start moving into our lane, so that
 13 automatically slowed the lane I was.
 14 Q. And looking at this photograph, would you have been in
 15 the set of cars that we see at the moment, or further
 16 back to the left, or further to the right?
 17 A. Further back.
 18 Q. Further back to the left?
 19 A. To the left — to the right.
 20 Q. Further to the right, so that the scene was happening
 21 behind you?
 22 A. No, no, no, the scene was happening in front of me but
 23 I was a bit further back, a little bit, from the picture
 24 I can see from now.
 25 Q. So your car would have been off to the left of this

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1 image?
 2 A. Yes, left of the image, yes, that's what I mean.
 3 Q. What do you then do?
 4 A. Well, automatically the traffic has slowed down,
 5 everyone — most people were coming out of — getting
 6 out of their vehicle, so I get out of my vehicle myself,
 7 and the passenger also that was inside the vehicle got
 8 out as well.
 9 Q. Where did you go from there?
 10 A. We just moved a little bit closer in the middle on
 11 the — in the middle aisle of the road, to actually view
 12 what was happening, so we moved a little bit to see what
 13 was going on.
 14 Q. Did you have a good view from that position?
 15 A. Yes, I did.
 16 Q. What could you see in the melee on the bridge from that
 17 point?
 18 A. Well, that was the time the attacker was sprayed with
 19 the fire extinguisher, and the other guy with the pole
 20 wrestling with him and everything, and then at the same
 21 time I could hear the police siren coming.
 22 Q. At one and the same time you saw the people who were
 23 dealing with the attacker engaging with him, one with
 24 the extinguisher, one with the pole, and you could hear
 25 a police siren?

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1 A. At the same time, yes.
 2 Q. From which direction was the police siren coming?
 3 A. It was coming from the — it was coming from the
 4 south — from the north side. I keep saying the south
 5 and the north. From the north side, because they came
 6 from the opposite side. We are going north coming from
 7 south. They came from the opposite side, and I was in
 8 the middle of the road, on the aisle.
 9 Q. Could you see any police vehicles at this point?
 10 A. Sorry?
 11 Q. Could you see any of the police vehicles?
 12 A. Any police at that time?
 13 Q. You say you heard some police sirens; could you see any
 14 police vehicles?
 15 A. Well, it took about roughly 30 seconds, or roughly about
 16 that, then the police vehicle just approached from the
 17 north side, coming, you know, then.
 18 Q. What did you do?
 19 A. I flagged them down.
 20 Q. Did they stop?
 21 A. Yes, they stopped because they were going at, like,
 22 maybe 30 or 40 miles an hour speed limit, and I just
 23 flagged them down to stop, that the incident is at the
 24 other side.
 25 Q. Did you speak to them or gesture to them?

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1 A. I just -- no, I didn't speak to them, I just point my
2 finger to them, my hand to them, and say the incident is
3 over there -- I didn't say anything, I just point.
4 Q. Is it right that flagging down the police car would have
5 taken your view and attention away from the scene on the
6 bridge for a short time?
7 A. Exactly.
8 Q. When you looked back, what was then happening?
9 A. Well, the police stopped and there was two police
10 officers with firearms, and they stopped, and they went
11 straight to that direction.
12 Q. Did you then watch what went on as the police officers
13 approached?
14 A. Yes, I went back to my same position where I was. By
15 then the incident that was taking place, like the guy
16 fighting with the -- the guy was carrying a knife,
17 fighting with the other three people, with the fire
18 extinguisher and the pole. By then he was already being
19 restrained, and he was on the ground, something like
20 that.
21 Q. I think we can see a view of that scene if we look at
22 {DC7421/37}. Now, this is an image of the police
23 officers arriving and starting to remove somebody from
24 the scene. Did you watch as the police officers arrived
25 and the people were restraining the attacker?

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1 A. Yes, I did. I was standing right there. I saw, yes,
2 one of the -- a guy who was on top of the -- the guy was
3 carrying a knife and the police were actually taking him
4 off. I actually saw this incident. Those are the two
5 officers that came there.
6 Q. How did the officers behave?
7 A. How did they?
8 Q. How did they behave? What did they do?
9 A. Well, given the -- they were just trying to make sure
10 everyone is safe at the time, and because they see a lot
11 of shouting and panic around, so they make sure that the
12 whole place, people are safe. They are not like any
13 more aggressive, but they were just trying to make sure
14 the whole place was safe at the time.
15 Q. How many officers approached the attacker as he was
16 being restrained?
17 A. Well, initially when those two officers came in the car,
18 it's like I saw another officer as well, but I don't
19 know whether it's a normal firearms police officer, it
20 could be like a third officer, but it was not like
21 a proper firearms officer, they were standing there as
22 well. So it was, like, far distance.
23 Q. What did you then see happening?
24 A. The ambulance came there. The ambulance came and
25 a couple of paramedics came out of the ambulance and

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1 they went into the big building, the Fishmongers'
2 building, which was where, I think, most of the incident
3 took place, so they went straight into that big
4 building.
5 Q. Now, can I just pause you there and go back a little and
6 just fill in some blanks by looking at some of the
7 things you say in your witness statement.
8 A. Mm.
9 Q. In your witness statement, and for the lawyers it's
10 towards the bottom of page 3, you say that as you were
11 looking at the people on the bridge -- this was around
12 the time that the police officers were arriving -- you
13 say that you saw a man on top of the man with the knives
14 trying to pin him down, that you discovered later that
15 day that the man had a knife and it was moved away from
16 him, and then you say this:
17 "The police officers went straight to where male 1
18 [that's the man with the knives] was being restrained.
19 At some point I was aware of a third police officer, but
20 I can't recall where he came from. One of the police
21 officers was trying to get the man on top of male 1 off
22 by pulling him, but they seemed to realise or see
23 something which caused them to change their behaviour,
24 which I later realised was the fake bomb vest, but
25 I didn't see it at the time."

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1 Now, do you remember seeing that: that the police
2 officers were trying to pull somebody off the attacker
3 and then appeared to see something and change their
4 behaviour?
5 A. Yes.
6 Q. Then you say in your statement that:
7 "As the male on top of male 1 was pulled off, male 1
8 tried to get back up."
9 Do you remember seeing that? Do you remember seeing
10 the man who had been tackled trying to get back up?
11 A. I did. He did stand up.
12 Q. And what then happened?
13 A. That was the time it was -- he was shot.
14 Q. Did you see or hear shots fired?
15 A. I saw it, and I heard -- I hear it at the same time.
16 Q. How many shots were fired?
17 A. From what I recall, it was two shots.
18 Q. Did the shots connect? Did they strike him?
19 A. Sorry? Yes, they did.
20 Q. Where was he shot?
21 A. Probably on his chest, or like or his upper arm area,
22 like on his shoulder (indicates).
23 Q. How did he react when he was shot? What happened to
24 him?
25 A. Well, he fall down and he started rolling on the floor,

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1 and he was shouting, saying something, I couldn't
 2 understand what, at some point I could hear him saying
 3 "Help, help".
 4 Q. Do you remember anything that the police were saying
 5 over this period?
 6 A. Yes, they just told everyone to back off, now everybody
 7 to back off from the area. That was the time they
 8 pushed everyone out of the bridge. People were -- some
 9 people were still stuck in their cars, they told
 10 everyone, though some of them were in the cars or those
 11 who were taking pictures, everybody to just leave the
 12 whole area.
 13 Q. Was it shortly after that that you went back to your
 14 vehicle?
 15 A. Yes.
 16 Q. Did you have a conversation with another driver about
 17 what was going on, what you'd seen?
 18 A. Yes, there was a mini truck or minibus -- okay, minibus,
 19 I would say, that was like ...
 20 Q. What did you say to that person about what you'd seen?
 21 A. The driver asked me what was going on, so I explained to
 22 him: I think there is a terrorist attack and someone has
 23 been -- the person has been shot and everything, and
 24 he'd got some kids, he take some school kids inside the
 25 bus, and some of them were, like, panicking and crying,

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1 and I can remember one of the police officers, another
 2 police officer, by then there was other police officers
 3 already approached the bridge, I could remember a couple
 4 of them telling people, and also the minibus where the
 5 kids were, to do a u-turn on the pavement in the middle
 6 of the bridge so that the kids, the bus can just move
 7 out of the bridge.
 8 Q. Did you speak to a police officer on the bridge about
 9 moving your vehicle?
 10 A. I did. I tried to move my vehicle as well, after I saw
 11 the bus move, so I told him if it's possible for me to
 12 move my vehicle as well. He said no, I would have to
 13 leave my vehicle there, it's not safe.
 14 Q. Did you then leave the scene on foot?
 15 A. I did leave the scene on foot, running away from the
 16 scene, and also I left my mobile phone, because when
 17 I was doing my job, with the Uber app, my phone itself
 18 was on top of the dashboard, like a holder, which I used
 19 to navigate, you know, so my phone was inside the car,
 20 so I end up to leave my phone in the car, but I have the
 21 car key with me, and the passenger that was with me was
 22 out of the car at the same time.
 23 MR HOUGH: Thank you very much, Mr Bockarie, those are the
 24 questions I have for you. I'll look to see if others
 25 have any questions.

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1 I don't think so. Thank you very much for coming to
 2 give your evidence today.
 3 JUDGE LUCRAFT: Thank you very much, sir, for coming, you're
 4 free to go. Thank you very much indeed.
 5 A. Okay, thank you.
 6 MR HOUGH: Sir, we now have three witness statements to be
 7 read, which will be read by Mr Moss, with his standard
 8 introduction.
 9 JUDGE LUCRAFT: Yes. Well, it's tempting for us to join in,
 10 Mr Moss, but we'll leave it to you with the
 11 introduction.
 12 MR MOSS: Sir, the three statements are the statement of
 13 Jessie Monck, dated 1 April 2021; Usmani Tariq,
 14 17 December of last year, and Mohammad Al-Dhmour, 14
 15 January of this year. They are all statements that you
 16 are admitting under Rule 23 of the Coroners (Inquests)
 17 Rules 2013. The nature of the written evidence has been
 18 communicated to interested persons through disclosure.
 19 In that same way, interested persons have had the
 20 opportunity to view those statements and to object to
 21 the evidence being read and, sir, there have been no
 22 objections.
 23 Sir, I will start with the statement of
 24 Jessie Monck, reference {WS5080} and if we could please
 25 have {WS5080/9} on the screen.

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1 MS JESSIE MONCK (read)
 2 MR MOSS: "I am Jessie Monck. I hold the position of
 3 development consultant at the University of Cambridge.
 4 I have held this position since 2003. As the lead for
 5 the implementation of the university's Prevent training
 6 plan in summer of 2016, I am making this statement to
 7 assist the Coroner's inquests and investigation
 8 following the incident at Fishmongers' Hall on
 9 London Bridge on Friday, 29 November.
 10 "This statement relates to two documents disclosed
 11 to the Inquests regarding Prevent training at the
 12 University:
 13 "1. A spreadsheet reflecting searches that were
 14 undertaken on relevant university databases regarding
 15 prevent training."
 16 Sir, that is the document on the screen in front of
 17 you, and document 2, that we don't need to see now.
 18 "2. A document detailing Jack Merritt's activity on
 19 the university online learning management system,
 20 Moodle, in connection with Module 1 of the Prevent
 21 training.
 22 "These documents were created by the personal and
 23 professional development section of the university's
 24 human resources division, the PPD. We were asked to
 25 provide information on 10 individuals for the purposes

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1 of the Inquests. I understand that these were the
 2 full-time and part-time employees of Learning Together,
 3 as at 29 November 2019."
 4 And I don't know whether it's possible to zoom in on
 5 those names in the surname and forename column on the
 6 spreadsheet, but sir, you will see the names are Ruth
 7 Armstrong, Amy Ludlow, Simon Larmour, Jack Merritt,
 8 Jenny Fogarty, Ingrid Obsuth, Isobel Rowbotham, Lisa
 9 Ghiggini, and Mohammad Al-Dhmour, whose statement I will
 10 read after this.
 11 "Prevent training modules. In order to compile the
 12 spreadsheet, we searched the university systems for
 13 evidence that the individuals had completed any of the
 14 four Prevent training courses offered by the university.
 15 Descriptions of these training courses are provided
 16 below:
 17 "Module 1.
 18 "'Prevent module 1: an introduction to the Prevent
 19 Duty', is the main online module used by the university.
 20 Module 1 was produced by Leadership Foundation for
 21 Higher Education, a sector body. This content was
 22 commissioned for use in the sector by the Higher
 23 Education Funding Council for England, the forerunner
 24 for the Office for Students. The university does not
 25 have the option to modify module 1, and we had to fit

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1 its content into our existing teaching and training
 2 platforms as best we could."
 3 Next:
 4 "Face-to-face training course, called "'The Prevent
 5 duty: a briefing for all staff'. It's a face-to-face
 6 training course developed in-house by the university,
 7 delivered twice a year through the PPD."
 8 Next:
 9 "Module 5.
 10 "'Prevent module 5: A student and staff well-being
 11 issue: safeguarding, pastoral care and student support',
 12 that is an additional online module created by the
 13 university. Module 5 was produced by adapting content
 14 contained in a separate package from the one used for
 15 module 1. The relevant package can be completed
 16 online."
 17 Then finally:
 18 "Online refresher module.
 19 "An online refresher module was developed wholly
 20 in-house by the university with input from the
 21 Department for Education's HE/FE Regional Prevent
 22 Coordinator at the university in mid-2019 and rolled
 23 out in autumn 2019.
 24 "We also searched to see whether we had been
 25 notified by any of the individuals that they had

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1 completed the equivalent Prevent training at another
 2 institution .
 3 "The PPD searched the university's online learning
 4 management system, called Moodle, to see whether any of
 5 the individuals listed had completed modules 1 or 5 of
 6 the Prevent training..."
 7 Sir, the individuals listed on the spreadsheet.
 8 "... and whether they had completed the refresher
 9 training .
 10 "Students and staff members can log into Moodle and
 11 complete courses hosted on the platform, and staff are
 12 able to post learning material onto it. The Moodle
 13 system records progress in courses and modules.
 14 A student or member of staff may, for example, need to
 15 show that they have completed Prevent training if they
 16 are working in a clinical environment. Members of the
 17 PPD can access the Moodle system as administrators and
 18 see the progress that individuals have made with
 19 courses."
 20 And then its witness says that:
 21 "Our Moodle records showed that:
 22 "Lisa Ghiggini completed module one
 23 in November 2017.
 24 "Dr Amy Ludlow completed module 1 in May 2018.
 25 "Isobel Rowbotham completed module 1

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1 in November 2017.
 2 "And, finally, Ruth Armstrong completed module 1 on
 3 12 January 2021.
 4 "There have been a handful of occasions where people
 5 have undertaken relevant Prevent training before they
 6 have joined the university and this has been confirmed
 7 by a member of their department. This is inputted
 8 manually on Moodle and then sent to HR Business Systems
 9 and Analysis to be updated on CHRIS with any records
 10 that month. There was no record of us being notified
 11 that any of the individuals named in the spreadsheet had
 12 undertaken Prevent training elsewhere."
 13 Under the heading "Face-to-face training and the
 14 university booking system (UTBS)", the witness says:
 15 "Booking and registration for face-to-face Prevent
 16 training is carried out through the UTBS, the training
 17 booking system. The UTBS is an electronic booking
 18 system for primarily in-person training sessions that's
 19 been used by the university since 2010. Searches of the
 20 UTBS did not show that any of the individuals in the
 21 spreadsheet had booked into or attended a face-to-face
 22 Prevent training session.
 23 "The information we accessed on Moodle showed that
 24 Jack Merritt had accessed the site where module 1 of
 25 Prevent training was hosted but he had not viewed the

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1 material."
 2 Sir, that is all I will read from that witness
 3 statement.
 4 I then move on to the statement of Usmani Tariq.
 5 JUDGE LUCRAFT: Thank you.
 6 MR MOSS: And we can please take that down off the screen.
 7 Sir, this statement for your reference, {WS0695}.
 8 MR USMANI TARIQ (read)
 9 MR MOSS: "This statement relates to the incident that
 10 occurred at Fishmongers' Hall and London Bridge on
 11 29 November 2019. I am the CEO of Henley Homes. I am
 12 responsible for the vision and strategic direction of
 13 the business, and I've been working here for around
 14 21 years. Henley Homes is a property development and
 15 construction company, and we oversee property
 16 developments all over the country, as far north as
 17 Scotland.
 18 "I am very passionate about the rehabilitation of
 19 ex-offenders through my own personal experiences, and
 20 within my company we've often given people opportunities
 21 to work with us. Henley Homes currently employs around
 22 five or six people at present who have previous
 23 convictions, and one of them has convictions under the
 24 Terrorism Act. I feel I've always had a good
 25 understanding of ex-offenders and what drives a person

1 into those circumstances. I've given a few talks at
 2 Feltham Prison in the past to young offenders about what
 3 their plans are in the future.
 4 "I first met Ruth Armstrong around four years ago at
 5 a private event, to which I had been invited, where
 6 Chris Grayling, the Justice Minister, was also in
 7 attendance. I had been invited there to discuss the
 8 rehabilitation of ex-offenders, which, as I've
 9 previously mentioned, is something I'm very passionate
 10 about.
 11 "After the event, Ruth approached me, I think with
 12 her colleague Amy, and we spoke for a bit and kept in
 13 touch. Ruth later asked me if I was able to help
 14 another individual that she had been in contact with who
 15 was serving a life sentence at HMP Grendon. I would say
 16 this was about three years ago. The help I'm able to
 17 offer is mentoring, support and employment.
 18 I'm passionate about making a meaningful contribution to
 19 society, and have been for the last 18 years or so.
 20 "I agreed to speak to this individual and visited
 21 him on a number of occasions, until the point when he
 22 was given leave to work from prison. We would then
 23 comply with any prison requests until they are allowed
 24 to work for us. This individual remains working with us
 25 today as a quantity surveyor and is doing really well.

1 I don't manage him personally, but I do keep an eye on
 2 his progress.
 3 "I attended the fifth year anniversary
 4 Learning Together event at Cambridge University, as
 5 I had been invited by Ruth. This was last year some
 6 time. I was never involved in their programme, but my
 7 understanding of Learning Together was they worked with
 8 people in prison to help them gain a Cambridge
 9 University degree whilst working alongside the usual
 10 Cambridge students. I saw this as a huge contribution
 11 to all those who were involved, especially for those in
 12 prison, as it allows them to achieve a level of dignity,
 13 which is key, in my opinion, for rehabilitation.
 14 "At the event, Usman Khan sent a live video message
 15 as he couldn't attend in person. It was a general
 16 message to say thanks and best wishes to everyone. At
 17 that point I had no knowledge or understanding of his
 18 convictions, I assumed he was just part of the
 19 Learning Together programme. Some months later, Ruth
 20 contacted me via email, and asked whether I could
 21 provide any support to Usman Khan, and asked me if she
 22 could give him my number. I agreed, and a few days
 23 later, Usman called me.
 24 "From memory, I understood his conditions were quite
 25 restrictive, and his geographical location made it

1 difficult for me to offer him any real practical
 2 assistance, which I made him aware of at the end of our
 3 conversation. He thanked me and he seemed fine about
 4 this. It was a short conversation, and I did not speak
 5 to him again.
 6 "From a more personal perspective, I have already
 7 someone working within the business that has been
 8 convicted under the Terrorism Act, and I didn't feel
 9 I wanted to be a common denominator, and there could be
 10 no other issues arising in the future. I just felt it
 11 was a more sensible decision, based on risk management,
 12 not to engage with Usman further. I did not want to
 13 hold the risk to us and the person that I already have
 14 working for us, and wanted to avoid any potential
 15 cross-contamination between them. There is a whole
 16 process behind it, starting with placing the individual
 17 within the construction environment, generally on a site
 18 to start with. The reason for this is, it's hard work,
 19 possibly beneath their educational capability.
 20 I'm looking for their focus and their understanding that
 21 this is a starting point to see if they're prepared to
 22 do what it takes in order to progress themselves.
 23 "I didn't directly manage the individuals myself.
 24 I have to consider how they would best fit within the
 25 company and contact the directors and ensure they're

1 happy to employ them. The person still has to go
2 through the whole interview process, regular appraisals,
3 throughout their employment.

4 "I keep an eye on them and how they are doing within
5 the company, how they are interacting with others and if
6 they're doing well. At the time I spoke to Usman,
7 I didn't get the sense that he was desperate, and he
8 didn't sound unstable at the time. He actually seemed
9 quite upbeat when I spoke to him. Perhaps at the time
10 I could have gone to visit him, but I didn't think it
11 was necessary through my own experiences of dealing with
12 people in these difficult situations, and I already had
13 made the decision during the phone call that we were not
14 able to offer him any support or employment as it wasn't
15 practical to do so."

16 And then, sir, the final evidence today is the
17 evidence of Mohammad Al-Dhmour, {WS0721}.

18 MR MOHAMMAD AL-DHMOUR (read)

19 MR MOSS: "This statement refers to my employment with
20 Learning Together and the events of 29 November 2019.
21 I was employed as a general administrator for the
22 Department of Criminology on a temporary part-time
23 basis.

24 "On 22 October 2019, I received an email from them
25 with two job opportunities, both in administration.

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1 I chose the general administrator role in criminology
2 which was 20 hours per week with an end of the contract
3 on 20 December 2019. The job description for this
4 vacancy was included in the advert and read as follows:

5 "'The role-holder will provide admin support to the
6 Learning Together team, working to support the delivery
7 and evaluation of local Cambridge and national practice
8 and activities, including prison-based education
9 opportunities and national and regional meetings and
10 events. In this role, you will be keeping on top of
11 daily admin tasks, including responding to emails,
12 dealing with post, photocopying, scanning and preparing
13 materials, alongside preparing materials for
14 newsletters. This role will also process course admin
15 documents and keeping records up to date on the system.
16 The role-holder will also support the organisation of
17 events'.

18 "The interview was arranged for 6 November 2019.
19 The interview was conducted by Ruth Armstrong and
20 Amy Ludlow and I was offered the job to start as soon as
21 possible. I was told they had an event coming up which
22 they needed to prepare for, and I was to help them
23 complete admin tasks in the office so they could
24 concentrate on the event.

25 "Amy and Ruth explained that Learning Together was

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1 a project to help prisoners learn alongside university
2 students. I liked the idea of them wanting to change
3 the behaviour of prisoners and give them hope for the
4 future. It feels good to be part of a team that works
5 towards making a difference in people's lives. I was
6 told that I would not be dealing with prisoners within
7 my role, and my job was office-based.

8 "I started working for Learning Together on
9 11 November 2019 and my reporting manager was
10 Amy Ludlow. I turned up on my first day and waited in
11 reception. Jack Merritt came to collect me and took me
12 to the office. He introduced me to the team, and they
13 were all lovely and very friendly. Jack showed me
14 around the office. He showed me where files were kept
15 and how to find things.

16 "I didn't get any formal training, it was really
17 on-the-job training, so as something came up, I would be
18 shown how to do it. During my first week I attended
19 a health and safety training session, which was a couple
20 of hours long, held by the University of Cambridge
21 health and safety department. A female was in
22 attendance too. She had just joined as a receptionist
23 for the criminology department.

24 "Our training was mainly about evacuations in the
25 event of a fire, first aid kits and general health and

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1 safety awareness. I can't remember receiving any other
2 training when I joined. I have been asked if I received
3 Prevent training, but I don't know what that is, so it's
4 probable that I didn't receive that.

5 "I had completed two short-term contracts for
6 another university prior to this, and two after this, so
7 I can't remember what training I did with that
8 university.

9 "There was no formal induction. I arrived on my
10 first day and was shown around the office, and my role
11 was to open letters, photocopy, print, file documents,
12 answer phones, very basic admin tasks. The team would
13 speak openly in the office so I heard a lot of
14 conversations but wasn't included in them.

15 "From when I joined Learning Together, the main
16 conversation in the office was about the upcoming event
17 on 29 November, the five-year celebration of Learning
18 Together being held in London. As I was part of the
19 team it was mentioned to me that I could go along if
20 I wanted, but I didn't have a specific role or task
21 there. I was aware that both prison and university
22 students would be at the event, as well as invited
23 guests. It was never discussed as to what type of
24 prisoners were going, and I just assumed they would be
25 low-level criminals, not dangerous offenders.

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1 "I didn't mind that prisoners would be there. It
 2 didn't put me off. I would hear the team talk about the
 3 students when I was in the office, and they would only
 4 refer to them as the university students and the prison
 5 students. They would not go into any detail about the
 6 offences the prison students had committed.
 7 "I did not know what training, risk assessment or
 8 instructions were given to the team that did attend the
 9 prisons, as that was nothing to do with me. I didn't
 10 get involved in the recruitment and training of new
 11 student or take part in any of their lectures or prison
 12 visits. I knew some of the team visited prisons as
 13 I would hear them talking in the office, "Where's Jack
 14 today?" "Oh, he's in prison", but I didn't know the
 15 detail.
 16 "I was aware that Simon was involved in research,
 17 but my job didn't cross over with his and I don't know
 18 exactly what research was done.
 19 "My involvement in the event was helping with the
 20 admin from the office, such as preparing the agenda,
 21 making up name cards and brochures, cutting them to size
 22 before sending them out to the attendees.
 23 "I had heard the name Usman Khan, but had no
 24 dealings with him. I had heard the team mention him in
 25 the office a few times, saying he was nice and good with

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1 them, and he had improved. I was aware that he was
 2 going to be at the event and I think he was going to
 3 speak there as we printed the speech, which we enlarged
 4 for him."
 5 Then, sir, at the end of the statement the witness
 6 describes how he turned up late to the event for
 7 personal reasons and therefore did not see anything of
 8 significance, so I shall not read that.
 9 JUDGE LUCRAFT: Thank you very much indeed.
 10 MR HOUGH: Sir, as the jury will have gathered from those
 11 statements, we're now moving on to evidence about
 12 Usman Khan's association with Learning Together.
 13 JUDGE LUCRAFT: Yes. And that's going to form the core of
 14 the evidence we're going to listen to tomorrow and into
 15 Friday?
 16 MR HOUGH: Indeed.
 17 JUDGE LUCRAFT: Very good.
 18 Ladies and gentlemen, we will part company there and
 19 meet again, please, tomorrow morning at 10 o'clock.
 20 Can I just tell you one thing: on Friday we're going
 21 to start a little bit later on Friday, there's something
 22 I need to do very first thing on Friday, so we will
 23 start at 11.00 on Friday morning, and tomorrow we'll
 24 start at the usual time of 10 o'clock. Thank you very
 25 much.

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1 (In the absence of the jury)
 2 I'll rise.
 3 (4.20 pm)
 4 (The court adjourned until 10.00 am on
 5 Thursday, 22 April 2021)
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