

OPUS2

Fishmongers' Hall Inquests: Inquest concerning the death of Usman Khan

Day 32 - UKI Day 2

June 1, 2021

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1 Tuesday, 1 June 2021
 2 (9.48 am)
 3 (In the absence of the jury)
 4 JUDGE LUCRAFT: Good morning, Mr Hough.
 5 MR HOUGH: Good morning, sir.
 6 There are three short issues for you to deal with
 7 before we sit with the jury today. They concern first
 8 of all the participation of the Jones family in the
 9 Inquest of Usman Khan; second, incidence of broadcasting
 10 of unpixellated or inadequately pixellated footage of
 11 anonymised officers, and thirdly, the discharge of one
 12 juror.
 13 May I take those in turn. First of all, the
 14 participation of the Jones family. Over the weekend we
 15 have received a request from the representatives of the
 16 Jones family that family members be permitted to
 17 participate in the Inquest of Usman Khan by way of one
 18 or more two-way video links, and we support that
 19 request.
 20 There are two possible jurisdictional routes. The
 21 first is that you permit them to participate under the
 22 common law jurisdiction of a coroner to regulate his or
 23 her own proceedings. That is set out in Chief Coroner's
 24 Guidance 38, which you will no doubt remember well,
 25 having authored it, and that requires treating the Jones

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1 family as having a proper interest in that degree of
 2 participation, although not interested persons
 3 themselves.
 4 We consider that that degree of participation is
 5 justified, just as a similar facility was made available
 6 to representatives of the Khan family, as I understand
 7 it, in the first hearing, so that they could consider
 8 whether to make representations or ask questions of any
 9 witnesses. We say that the same approach should apply
 10 for the benefit of the Jones family.
 11 There will also, secondly, be a jurisdictional route
 12 to the same conclusion by designating part of the Jones'
 13 family home as an extension of the court. That is
 14 a well established legal route, but we suggest it's more
 15 cumbersome and engages you in policing the extension of
 16 the court, which you may think less appropriate in the
 17 circumstances.
 18 We don't understand there to be any objection,
 19 having canvassed interested persons in the Inquest of
 20 Usman Khan.
 21 JUDGE LUCRAFT: Thank you very much, Mr Hough. I think as
 22 you have indicated the first of the two routes is the
 23 better route for me to direct, and I will do so.
 24 MR HOUGH: Thank you very much, sir. Those links, or that
 25 link, will be established.

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1 The second issue to raise concerns a broadcasting
 2 matter. This is a recurrence of a problem which arose
 3 during the Inquests of the victims, and which is
 4 addressed in the transcript for 14 April 2021, Day 3
 5 from page 1. Sir, your order of 5 June 2020 granted
 6 anonymity and special measures to various officers who
 7 were involved directly in the confrontation with
 8 Usman Khan, and some others. Your order was accompanied
 9 with an order under section 11 of the Contempt of Court
 10 Act 1981 prohibiting publication in connection with
 11 these Inquests of information liable to identify
 12 anonymised officers, which included their images, unless
 13 of course successfully pixellated.
 14 The problem which has arisen is that the press have
 15 footage which is unpixellated and shows the anonymised
 16 officers, including in particular footage which the
 17 press received from the public. Under your order, that
 18 must not be published, including by posting on websites,
 19 unless it is pixellated properly.
 20 Sir, this is a very serious matter, as I emphasised
 21 on the last occasion. There were good reasons for your
 22 order, and your order was not challenged. An incident
 23 of this kind, the publication of unpixellated or
 24 inadequately pixellated footage occurred on a couple of
 25 media outlets over the weekend, and that is of course

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1 troubling because of the warning you gave on 14 April.
 2 It is disappointing, because the reporting and approach
 3 of the press to these hearings has, in the main, been
 4 constructive and responsible. It must not recur in the
 5 coming days when these officers are giving evidence.
 6 The easiest course for the press is to use only
 7 material which is provided in press packs via the
 8 Metropolitan Police Service and which has been carefully
 9 and properly pixellated. That also has the advantage
 10 that it will be evidence that will go before the jury.
 11 However, if other footage is to be used, it must be
 12 pixellated properly, so as to secure anonymity, bearing
 13 in mind — and I will put this carefully — that various
 14 aspects of facial features may lead to a person's
 15 identification.
 16 If this problem recurs, then it may be that
 17 applications will be made which will impinge upon the
 18 press and their access to the evidence. That is not
 19 something we would want, because it is important to us
 20 that as much openness in these proceedings prevails as
 21 is possible, but we understand that the police forces
 22 concerned may lose some of their trust and confidence in
 23 the press if there are repeated breaches of this kind.
 24 I see that Ms Barton has come forward. She represents
 25 some of the principal officers and it may be that she

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1 has something to add.
 2 JUDGE LUCRAFT: Thank you.
 3 Ms Barton.
 4 MS BARTON: Sir, I think there is going to be a sense of
 5 déjà vu in the remarks I'm about to make.
 6 As I said on 14 April at the commencement of the
 7 Inquests into the deaths of Jack and Saskia, the City of
 8 London Police firearms officers have been afforded the
 9 protection of anonymity orders throughout these
 10 proceedings, you having made those orders on the basis
 11 of evidence and risk assessments which justified the
 12 orders as being necessary. They are not orders which
 13 you or any court makes lightly.
 14 Sir, the practical efficacy of these orders has yet
 15 again been undermined by a number of accredited media
 16 outlets showing unpixellated historic footage. That
 17 footage was shown on Friday at the conclusion of Jack
 18 and Saskia's Inquest when of course there was a huge
 19 amount of justifiable media interest in the events.
 20 Sir, I am going to single out the BBC as a repeat
 21 offender. They appear to be under the complete
 22 misapprehension that they are somehow exempt from the
 23 orders that you have made. They have a historical
 24 context for this as well because you may recall, sir,
 25 that they published unpixellated footage of City of

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1 London police officers in the London Bridge and
 2 Borough Market Inquests, they were also one of the
 3 organisations which published unpixellated footage at
 4 the commencement of the Inquest in April, and despite
 5 the clear warnings that you gave on 14 April, which they
 6 must have known were applicable to them, because the
 7 City of London Police media department and
 8 the Commissioner had contacted them directly, they were
 9 one of the organisations which on Friday put
 10 unpixellated footage back onto their website and their
 11 news channels.
 12 They have now seen fit, sir, on three occasions,
 13 once in London Bridge and twice in these Inquests, to
 14 breach orders which you have made. Sir, on 14 April, in
 15 response to submissions that I made on that day, you
 16 said very clearly:
 17 "Great care has been taken in the footage that has
 18 been shown in court and which is available through the
 19 media packs, and it seems to me that it's very obvious
 20 that is the material which should be used."
 21 Sir, whilst, of course, you cannot direct or order
 22 that, you gave the clearest possible indication that
 23 that was the safest way of ensuring that your orders
 24 were complied with.
 25 Sir, the concern of the City of London Police, who

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1 I represent, goes more widely than the direct issues
 2 that relate to our officers in this case: the media has
 3 repeatedly demonstrated an inability or an unwillingness
 4 to abide by court orders made in the clearest possible
 5 terms, backed up by your clear advice and direction.
 6 The message, regrettably, that is going out to firearms
 7 officers protected by such orders that you have made, to
 8 put it bluntly, is that the orders aren't worth the
 9 paper they're written on or the website they're
 10 published on, and that's a very sad thing for me to have
 11 to stand here and say, because anonymity orders are
 12 a very important concept going forward for the trust and
 13 confidence of the police officers concerned, not just in
 14 the media, but more importantly in the ability of the
 15 court to protect their position.
 16 Sir, in respect of the media, but the BBC in
 17 particular, the time may have come for you to hold the
 18 editors of the relevant programmes to account,
 19 ultimately that is a matter for you and I understand
 20 that, but the message from this court cannot continue to
 21 be that the media can flout court orders with impunity,
 22 and there is no sanction for it.
 23 JUDGE LUCRAFT: Well, Ms Barton, I'm actually going to ask
 24 for a written explanation from the BBC as to why they
 25 ignored the direction that I had given, and an apology,

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1 because I haven't actually had any apology from any
 2 media organisation for breaching my order, to me direct,
 3 and so I will require a written explanation by lunchtime
 4 today from the BBC explaining why they showed this
 5 footage, contrary to the direction I gave, and a clear
 6 understanding that they understand what the order means
 7 going forward.
 8 MS BARTON: I'm very grateful for that indication, thank
 9 you, sir.
 10 MR HOUGH: Sir, the third matter is one I understand you
 11 proposed to raise concerning the discharge of a juror,
 12 which has arisen over the weekend.
 13 JUDGE LUCRAFT: Yes. Mr Hough, after we selected the
 14 11 jurors to, using my analogy, the 11 players to form
 15 the pitch, it came to my attention that one of those 11,
 16 when spoken to by my usher, had a concern about --
 17 nothing connected to the facts of this case, but just
 18 a concern they had personally about undertaking jury
 19 service, and in the light of the detail that was made
 20 known to me, I took a decision to discharge that juror.
 21 Fortunately we do have three spares, and as we
 22 selected those at random, assuming there is not
 23 a problem, I will ask juror number 12 to take the seat
 24 of the juror, I am going to propose, which was juror
 25 number 8.

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1 MR HOUGH: Thank you, sir.
 2 JUDGE LUCRAFT: I'll rise and just check that we've got all
 3 of our jurors here and then I'll just see if there are
 4 any other issues from the other jurors, and then
 5 hopefully we'll make a start fairly soon.
 6 (10.01 am)
 7 (A short break)
 8 (10.09 am)
 9 (In the presence of the jury)
 10 JUDGE LUCRAFT: Good morning, everyone. Very nice to see
 11 you, and many congratulations on passing the krypton
 12 factor test, which is to remember where you were sitting
 13 on Friday.
 14 There is one empty seat, some of you may spot, and
 15 so the lady who is in my eye line at the front, I'm
 16 going to ask, madam, whether you would take up the empty
 17 seat. Just so there's no mystery, the lady who was
 18 sitting there spoke to my usher after we finished on
 19 Friday, and for very good reasons I have discharged her
 20 from continuing as a juror in this Inquest, and so as we
 21 selected you all at random on Friday, I've replaced that
 22 person — not the mayonnaise incident that I spoke about
 23 on Friday, but it just goes to show, in a sense, how the
 24 most unexpected thing can happen, and so my request to
 25 have three reserves was well founded, certainly so far

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1 as one is concerned.
 2 Can I just take this opportunity to ask the 11 who
 3 are now seated, this is your moment to tell me of that
 4 metatarsal injury as to why you can't see this Inquest
 5 through to the end of next week, so it's quite a short
 6 period. The end of next week. Any hands? Put a hand
 7 up if you have got any concerns at all. Very good.
 8 The two gentlemen, then, who are on the substitutes
 9 bench. As I mentioned on Friday, you may feel slightly
 10 frustrated that you have come back and I have not had to
 11 call upon you, but can I simply just thank you very much
 12 for bearing with me. I hope you both understand why it
 13 was a wise precaution to have some reserves. I've used
 14 one, so to that extent, the position was vindicated, but
 15 thank you very much, but you are now free to leave us.
 16 Thank you.
 17 Mr Hough, we are now in a position to embark on the
 18 evidence.
 19 MR HOUGH: Yes. The first witness is DCI Dan Brown, perhaps
 20 he could be sworn.
 21 DCI DAN BROWN (sworn)
 22 THE WITNESS: Good morning, sir. My name is Dan Brown,
 23 I'm a detective chief inspector from SO15,
 24 Counter—Terrorism Command of the Metropolitan Police.
 25 JUDGE LUCRAFT: Thank you very much indeed, officer. Please,

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1 again, feel free to sit or stand, whichever you would
 2 prefer to do.
 3 Ladies and gentlemen, you have been provided with
 4 notebooks, and I think you've got pens. It's a matter
 5 very much for individual choice. Don't feel you have to
 6 make a note, but it's there if it would help you. What
 7 I mentioned on Friday, but I will just repeat now, is
 8 that we will take a break mid—morning and mid—afternoon
 9 whilst we listen to the evidence. This room can get
 10 a bit warm. If I had a magic wand, I could make the
 11 temperature ideal for everyone, I am afraid I can't do
 12 that, but I hope — there is water, if you need it. If
 13 anyone needs a break, please do just let me know and we
 14 can easily take a short break at any stage.
 15 Mr Hough.
 16 Questions by MR HOUGH QC
 17 MR HOUGH: DCI Brown, you have told us that you are from
 18 SO15, the Metropolitan Police Service's
 19 Counter—Terrorism Command. In that capacity, have you
 20 been the senior investigating officer for
 21 Operation Bemadam, the investigation into the attack at
 22 Fishmongers' Hall and London Bridge on 29 November 2019?
 23 A. Yes, sir, I have.
 24 Q. Do you appreciate that you are now giving evidence to
 25 summarise the events of the attack, to summarise your

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1 team's investigation, and to introduce us to various
 2 visual aids?
 3 A. Yes.
 4 Q. You will be making use, I think, of an overview report,
 5 which we don't need on screen, but which is reference
 6 {DC6603}.
 7 A. Yes, I have that with me.
 8 Q. I think you are aware that you are later scheduled to
 9 give evidence in this hearing concerning the life,
 10 background and preparations of Usman Khan for the
 11 attack?
 12 A. Yes.
 13 Q. Looking at the first couple of pages of your report,
 14 could you summarise to us the investigative strands of
 15 the police response to the attack?
 16 A. Yes. The initial response was to identify any potential
 17 outstanding terrorist that presented a risk to the
 18 public; secondly, to investigate the timeline of events
 19 on the day and the details of the attack itself, and
 20 then finally, to investigate the motivation for the
 21 attack, Khan's background, and then the planning and
 22 preparation for the hours leading up to the incident
 23 itself.
 24 Q. And did the second and third strands of that response,
 25 investigation of the attack and Khan's motivation and

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1 background, fall to you?
 2 A. Yes, they did.
 3 Q. Next, please, may we turn to some basic facts about
 4 Usman Khan. When and where was he born?
 5 A. Khan was born in Stoke-on-Trent on 10 March 1991, so he
 6 was 28 years old at the time of the attack.
 7 Q. Now, we'll hear from you later in the Inquest that he
 8 had some brushes with the police in his early to
 9 mid-teens, but did he get into more serious trouble with
 10 the police at the age of 19?
 11 A. He did, yes. In December of 2010 he was arrested for
 12 terrorism offences and later pleaded guilty to offences
 13 of preparing for acts of terrorism.
 14 Q. And is it right that the offence to which he pleaded
 15 guilty, and the basis of his plea, were that he had
 16 participated in a plot to set up a terrorist training
 17 facility in Kashmir?
 18 A. That's correct.
 19 Q. Was he then imprisoned between December 2010
 20 and December 2018 in a number of prisons?
 21 A. That's correct, yes.
 22 Q. Was he then released on 24 December 2018, subject to
 23 various legal conditions?
 24 A. He was, yes, released under licence conditions and
 25 notification requirements under the Terrorism Act.

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1 Q. For the last year of his time in prison, so
 2 from November 2017 to December 2018, did Khan
 3 participate in a number of education courses held by
 4 an organisation called Learning Together?
 5 A. That's correct, yes, the organisation associated with
 6 Cambridge University.
 7 Q. After he had been released into the community
 8 in December 2018, where did Khan initially live?
 9 A. He moved to Stafford, in Staffordshire.
 10 Q. And initially, I think, living in a probation hostel
 11 there?
 12 A. Yes.
 13 Q. Did he remain in contact with Learning Together in the
 14 months that followed?
 15 A. He did, yes. I believe he filmed a video and also
 16 attended an event at Whitemoor Prison.
 17 Q. Was the event at which the attack took place another
 18 Learning Together event in November 2019?
 19 A. That's correct, yes, at Fishmongers' Hall in the City of
 20 London.
 21 Q. May I now ask you a few questions about the two young
 22 people who were killed in the attack, Jack Merritt and
 23 Saskia Jones. First of all, could you give us some
 24 basic biographical information about Jack Merritt?
 25 A. Yes, Jack was born on 1 October 1994 and was 25 years

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1 old at the time of the attack. He graduated from the
 2 University of Cambridge in 2017 with a master's degree
 3 in criminology after having completed an undergraduate
 4 degree from Manchester University. He worked for
 5 Learning Together as a course coordinator, and attended
 6 the event on that day in that capacity.
 7 Q. Is it right that Jack Merritt knew Usman Khan reasonably
 8 before the event and had, in fact, exchanged direct
 9 communications with him?
 10 A. Yes, that's correct, and again, in the capacity as
 11 course coordinator for Learning Together.
 12 Q. Next, please, some basic biographical information about
 13 Saskia Jones.
 14 A. Yes, Saskia was born on 12 February 1996, so she was
 15 23 years old at the time of the attack. She had also
 16 graduated from the University of Cambridge in 2008 with
 17 a master's degree in criminology, and she had been
 18 an undergraduate at Anglia Ruskin University. She was
 19 involved with Learning Together as a graduate student at
 20 the University of Cambridge and was one of their alumni
 21 community.
 22 Q. May we next consider the location and the background to
 23 the attack. Is it right that the attack began at
 24 Fishmongers' Hall, the hall of one of the livery
 25 companies of the City of London?

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1 A. That's correct, yes.
 2 Q. May we have on screen {DC8000/28}.
 3 Now, just for the benefit of the jury, sir, all
 4 references beginning {DC8000} are to pages in a jury
 5 bundle, which the jury will receive in hard copy towards
 6 the end of the hearing.
 7 JUDGE LUCRAFT: Thank you.
 8 MR HOUGH: Mr Brown, do we see here towards the bottom of
 9 the page London Bridge going across the Thames from
 10 north to south?
 11 A. Yes.
 12 Q. Fishmongers' Hall on the north bank, on the west side of
 13 the continuation of London Bridge?
 14 A. Correct.
 15 Q. And London Bridge continuing north into King William
 16 Street and towards the top of the page, the junction
 17 near Monument station?
 18 A. That's correct, yes.
 19 Q. Then {DC8000/29}, please. I think we're looking at the
 20 central part of that plan amplified and oriented in
 21 a different direction, north this time to the right of
 22 the page rather than the top.
 23 A. Yes.
 24 Q. We can see Fishmongers' Hall over to the top left.
 25 A. Correct.

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1 Q. And do we see opposite it a building called
2 Adelaide House, which we'll hear about?
3 A. That's right, yes.
4 Q. And then for some photographs of the building,
5 {PH0002/6}, please. Can we see here an aerial view of
6 Fishmongers' Hall and the main front entrance with steps
7 leading up to the main door?
8 A. That's correct, yes, into the reception area.
9 Q. Then {PH0002/8}, please. We're looking at the same
10 frontage from a slightly different angle, and can we see
11 quite how close the building is to the River Thames, and
12 how there is a level below the London Bridge level which
13 is just at the Thames embankment?
14 A. That's correct, yes.
15 Q. Then {PH0002/9}, please. Have we moved around a little
16 so that we can see London Bridge going over looking
17 south?
18 A. Yes.
19 Q. Then {PH0002/13}, please, an aerial view with
20 Fishmongers' Hall on the right?
21 A. Yes.
22 Q. Adelaide House on the left?
23 A. Correct.
24 Q. And London Bridge going over the Thames from north at
25 the bottom of the page to south at the top?

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1 A. That's right, yes.
2 Q. And then if we put on the screen {PH0006/3}, we'll see
3 a different viewpoint. On this image can we see
4 Fishmongers' Hall towards the bottom of the screen on
5 the left?
6 A. That's right.
7 Q. With the entrance just near the little blue and yellow
8 tent we can see?
9 A. Yes.
10 Q. Can we see that the road over London Bridge continues
11 north past Fishmongers' Hall, turning into King William
12 Street?
13 A. Yes.
14 Q. And then, as we follow with our eyes up the page, it
15 continues up to a T junction near Monument station?
16 A. That's right, yes, that's Cannon Street.
17 Q. So that's the scene, to orientate ourselves. We can
18 take that image off screen now.
19 Considering, then, the interior of the hall and the
20 timeline of the day up to the attack, how did Usman Khan
21 get to the event that day?
22 A. So he travelled on the train from Stafford that morning
23 on his own, where he was met at Euston, London Euston
24 station, by representatives of the Learning Together
25 organisation, a gentleman called Simon Larmour and one

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1 of the alumni, John Crilly. The three men then
2 travelled on the London Underground to Monument station,
3 where they walked to the hall.
4 Q. I think the jury will later hear that Mr Crilly, one of
5 the two who met him, was later involved in fighting him
6 off during the attack?
7 A. That's correct, yes.
8 Q. From Monument station, and we saw its approximate
9 location on that last photograph, did they walk to the
10 hall?
11 A. Yes.
12 Q. May we put on screen {DC6603/13} and the lower half of
13 the page. Can we see here a still image from a CCTV
14 camera positioned above the main door of
15 Fishmongers' Hall, showing Usman Khan, Mr Larmour and
16 Mr Crilly arriving that morning?
17 A. Yes, that's right. Mr Khan is wearing the black
18 baseball cap, Mr Larmour wearing the blue beanie hat and
19 then Mr Crilly with the grey hair.
20 Q. Is it right that the correct time of this photograph is
21 09.58, whereas we see that the time is an hour fast on
22 the screen?
23 A. Yes, that's correct.
24 Q. May we now look at some images of the interior of
25 Fishmongers' Hall, first of all, the entrance,

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1 {PH0050/1}. Is that a view towards the main double
2 doors?
3 A. That's right, yes, those steps that we've seen in
4 previous photographs.
5 Q. Then {DC8000/36}, are we now inside the front reception
6 area, having just come through those doors with the
7 doors behind us?
8 A. That's correct, yes. The doors are effectively just off
9 to the left, the main doors.
10 Q. So this is the view you would get if you had come into
11 the hall and were looking to the left with the doors
12 immediately behind you?
13 A. That's right, yes.
14 Q. Then {DC8000/37}. Can we see here just over to the
15 right of the image, the main entrance doors with one of
16 them open, so a view from inside that reception area
17 towards the other side of the reception area and the
18 entrance doors?
19 A. Correct.
20 Q. And then {DC8000/40}, please. Have we now moved further
21 into the building with the reception area immediately to
22 our left?
23 A. Yes.
24 Q. And looking down a main corridor. What is over to the
25 right?

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1 A. So the main stairway is over to the right. It's quite
 2 a large imposing double stairway that goes up and then
 3 around on the outside. I think we'll see photographs of
 4 that shortly.
 5 Q. {DC8000/45} for that photograph, please.
 6 A. Yes.
 7 Q. That's that main staircase viewed from the other side of
 8 it?
 9 A. That's correct, yes.
 10 Q. Then {DC8000/46}, can we see the staircase viewed from
 11 part of the way up?
 12 A. Correct, yes.
 13 Q. Then at {DC8000/48}, are we now looking at a landing at
 14 the top of the staircase with the two limbs of the
 15 staircase going down over to the right?
 16 A. Yes.
 17 Q. And is it right that various function rooms lead off
 18 from this landing?
 19 A. Yes, that's right, so the main banqueting suite or
 20 banqueting room is to the left, there is the Court
 21 Drawing Room sort of diagonally to the left beyond the
 22 Banqueting Hall, and then the Court Dining Room is
 23 straight ahead.
 24 Q. If we look at the Banqueting Hall at {DC8000/56},
 25 please, and {DC8000/49}.

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1 A. That's correct, yes. So the top of the stairs that the
 2 jury will have just seen are through to the right of
 3 those doors on the right—hand side.
 4 Q. Now, considering the order of events that day, is it
 5 right that events kicked off with a brunch served in the
 6 Court Dining Room, a room you have just mentioned, near
 7 the Banqueting Hall from 11.00 am that day?
 8 A. That's right, yes.
 9 Q. {DC6603/6}, please. If we go to the lower part of the
 10 page, can we see there an image of people having brunch
 11 at the start of the day?
 12 A. Yes, we can. Yes.
 13 Q. Saskia Jones picture over to the right of the picture
 14 circled?
 15 A. Yes.
 16 Q. And another of the attendees who was injured over to the
 17 left?
 18 A. Yes, that's Steph Szczotko.
 19 Q. Then {DC6603/14}. Is this another image of the brunch
 20 served that morning, this time with Usman Khan circled,
 21 wearing that dark jacket we saw in the earlier
 22 photograph?
 23 A. Yes, that's Khan.
 24 Q. Then {DC6603/7}, please, in the upper part of the page.
 25 Did the Learning Together event begin in the Banqueting

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1 Hall with an opening session shortly after noon that
 2 day?
 3 A. That's right, yes, and in that image there you can see
 4 Khan talking to Saskia Jones.
 5 Q. This is just before the start of the event, and they're
 6 at one of the tables towards the front of the hall?
 7 A. Yes.
 8 Q. And then {DC6603/9}, please, the lower half. Is this
 9 an image from the same period with a closer view of that
 10 table, with Usman Khan marked as number 1 and Saskia as
 11 number 2?
 12 A. That's correct, yes.
 13 Q. After the opening session, what then happened with the
 14 attendees?
 15 A. So the attendees split into two groups and there were
 16 two workshops taking place, one remaining in the
 17 banqueting room and the other going into the Court
 18 Drawing Room, which is the door you can see just at the
 19 top. Khan remained in the banqueting room and Saskia,
 20 and in fact Jack, also went into the other workshop in
 21 the Court Drawing Room.
 22 Q. If we go to {DC6603/7}, at the bottom of the page do we
 23 see there an image from the workshop session in the
 24 Court Drawing Room next to the Banqueting Hall which
 25 began, as you've told us, shortly after 12.30?

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1 A. Yes, with Saskia circled in that workshop.
 2 Q. When did these two workshop sessions conclude?
 3 A. They concluded roughly around 1.30. Obviously they
 4 didn't finish exactly the same time, but roughly around
 5 about that time.
 6 Q. What then followed?
 7 A. So people sort of milled about, some people went outside
 8 for a cigarette, to the toilet — comfort breaks,
 9 et cetera, waiting for the second session to start.
 10 Q. May we then go to {DC6603/8} of the same document, upper
 11 image. What's the image we're looking at here?
 12 A. So that's the image of Jack, having gone outside to
 13 smoke, and was just returning back into the building.
 14 Q. Is it right that he left the hall at about 13.37, 1.37,
 15 and returned at 13.40?
 16 A. Correct.
 17 Q. {DC6603/8}, the lower image, please. Was a photograph
 18 taken showing him on his own phone at 13.52?
 19 A. That's right, yes. So he had returned — from that
 20 previous photograph, he had returned upstairs, bumped
 21 into the three individuals in the photograph who were
 22 all from Learning Together, and asked another man to
 23 take a photograph with his phone.
 24 Q. Then {DC6603/9}, please. If we look at the upper part
 25 of the page. After he had returned to the building, did

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1 Jack Merritt briefly go into the Banqueting Hall again?
 2 A. Yes, that's right, and he's talking to a gentleman
 3 called David Ormerod, who in fact was the person that
 4 took the photograph on his own phone, on his behalf.
 5 That was the last photograph we have of Jack.
 6 Q. This last photograph of Jack I think was timed at 13.53?
 7 A. Correct.
 8 Q. Where did he go from there?
 9 A. So he made a comment to Mr Ormerod that he was going to
 10 go to the toilet, so he went back downstairs at that
 11 stage to the toilets.
 12 Q. If we go to {DC6603/3} of the same document, please, and
 13 the upper image, the upper plan, if we look at the
 14 middle part towards the top we can see that grand
 15 staircase that we looked at earlier.
 16 A. Yes.
 17 Q. The general corridor beneath it.
 18 A. Yes.
 19 Q. And marked with an orange rectangle, an area including
 20 the lobby, cloakroom, and gent's toilets.
 21 A. That's right. You have to go into the lobby area, past
 22 the cloakroom, up, I think it's three steps, into the
 23 gent's toilets.
 24 Q. If we put on screen {PH0050/72}. I think we can now see
 25 the entrance to the gent's toilets just up those three

25

1 steps?
 2 A. Yes.
 3 Q. With the cloakroom desk immediately on our left?
 4 A. Yes, and that's a mirror on the right-hand side: that
 5 shows the image that's behind you.
 6 Q. And, sir, I'm about to show some photographs with images
 7 of blood on the floor, quite clearly, so I just give
 8 that warning. May we now have on screen {DC8000/43}.
 9 Is this part of the gent's toilets in Fishmongers' Hall
 10 which you enter having gone through the door at the top
 11 of those steps and followed the toilets around to the
 12 far end?
 13 A. That's right, yes, so the two doors at the end are the
 14 cubicles with the urinals on either side, and then the
 15 entrance is just to the right of the photograph.
 16 Q. In this area what happened to Jack Merritt?
 17 A. This is the area we believe Jack was stabbed by Khan.
 18 Q. How did you divine that he was stabbed in that
 19 particular area?
 20 A. So blood pattern analysis was conducted on the blood
 21 that was there, there's a significant amount of blood at
 22 the scene and it was clear that the attack had started
 23 literally just outside those two cubicles. We also
 24 recovered some items in the left-hand cubicle that we
 25 believe belonged to Khan.

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1 Q. We'll look at those in a moment, but is it right that in
 2 this area, Jack received a large number of knife-wound
 3 injuries from Usman Khan?
 4 A. Yes, it is.
 5 Q. If we put on screen {DC8000/98}, what items are we
 6 looking at here?
 7 A. So these are gloves that were worn by Khan and a face
 8 mask, a kind of motorbike face mask, again worn by Khan
 9 whilst he conducted the attack.
 10 Q. Where did he do those items?
 11 A. So we believe he put those items on in that left-hand
 12 cubicle.
 13 Q. If we put on screen {DC8000/100}, please. Looking over
 14 to the left of the image, do we see a photograph of the
 15 cubicle over on the left where you say that Khan made
 16 his preparations?
 17 A. That's correct, yes. That's what we found inside.
 18 Q. And on the right we see all the various items that were
 19 found left inside the bag after Khan left it?
 20 A. That's right, yes.
 21 Q. We can see one knife which had been left inside the bag;
 22 did Khan take two knives with him, which he taped to his
 23 wrists?
 24 A. That's correct, yes, they were recovered outside on
 25 London Bridge.

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1 Q. {DC8000/94}, please. Is this an image of one of the
 2 knives, each side — each face of the knife shown
 3 separately?
 4 A. That's correct, yes, and you can just see the tape
 5 around the top, and that tape had originally been taped
 6 around the gloves that were worn.
 7 Q. He secured the knives to his wrists in that way, taping
 8 the knives to the gloves that we saw?
 9 A. That's correct, yes.
 10 Q. Then {DC8000/95}, please. Do we see here the second
 11 knife?
 12 A. That's correct, again you can see the tape.
 13 Q. May we now have on screen {PH0043/5}. Now, we're
 14 looking again at the area of the urinals with the sinks
 15 just over to the right. What was the book that was
 16 found, which we see on the floor, and what's its
 17 significance?
 18 A. So we believe that was a book that was carried there by
 19 Khan, it was called Fortress of the Muslim, it's
 20 a general book of prayer for those who follow the
 21 Islamic faith.
 22 Q. {DC8000/99}, please. Do we see there the book pictured
 23 up close?
 24 A. Yes.
 25 Q. We can take that off screen. Now, you've told us where

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1 Jack Merritt was initially attacked and how you
 2 established that he was attacked there. Were there any
 3 others in the toilets at that time who directly
 4 witnessed the attack?
 5 A. No, there were not, no, it was simply Jack and Khan
 6 inside the toilets at the time of the attack.
 7 Q. After Khan had attacked Jack Merritt in that area, where
 8 did he go?
 9 A. He left the toilets and he went into the lobby area
 10 we've just seen, by the cloakroom.
 11 Q. {DC8000/42}, please. That's the image we looked at
 12 before. So Khan would have come down those steps, which
 13 we see, from the toilets while Jack Merritt was still in
 14 the toilets injured?
 15 A. That's correct.
 16 Q. Then {DC8000/41}, please. Are we now looking at the
 17 same area with our viewpoint slightly over to the left,
 18 looking at the cloakroom area, with the gentlemen's
 19 toilets over to the right?
 20 A. Yes.
 21 Q. Who was in this area and what happened after Khan got
 22 there?
 23 A. So there were three people in this area, there were two
 24 members of staff from Fishmongers' Hall, one in the
 25 cloakroom, so you imagine that the counter was actually

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1 shut and she was behind the counter, there was a lady
 2 who was one of the cleaning staff to the right—hand
 3 side, and then Saskia Jones had just arrived at the
 4 counter, we believe about to put her coat into the
 5 cloakroom.
 6 Q. What did Khan do?
 7 A. We know that — well, according to the member of staff
 8 that was outside of the cloakroom on the right—hand
 9 side, he approached her, however, signalled for her to
 10 remain silent, ie sort of putting a finger up towards
 11 her mouth. That's what she told us in a statement.
 12 Q. So Khan signalled to the member of staff to be quiet.
 13 A. Yes.
 14 Q. What did he then do?
 15 A. He then approached Saskia Jones who, as I say, was at
 16 the counter, and he stabbed her once to the neck.
 17 Q. During the Inquests of Jack Merritt and Saskia Jones, is
 18 it right that the court heard that there was one stab
 19 wound inflicted with very significant force to the neck?
 20 A. Yes, that's correct.
 21 Q. In her injured state, where did Saskia Jones go?
 22 A. She managed to walk back to the main staircase and
 23 managed to climb about three to four stairs before she
 24 collapsed as a result of her very serious injury.
 25 Q. Could we put on screen {DC6603/11} and focus on the

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1 image on that page. Is that the area where Saskia Jones
 2 collapsed?
 3 A. That's correct, yes.
 4 Q. Did she receive first aid in that area from others who
 5 had attended the event?
 6 A. Yes, initially other attendees and then subsequently
 7 police and London Ambulance Service.
 8 Q. Meanwhile, what was Jack Merritt doing, having been
 9 injured in the toilets?
 10 A. So Jack managed to walk out of the toilets, albeit
 11 suffering again very serious injuries, and he managed to
 12 stumble into the reception area.
 13 Q. As he reached the reception area, where did he go?
 14 A. So he initially went to the front door, and there is
 15 an image we have of him through the front door from the
 16 exterior camera, and he then managed to get into the
 17 small reception area, which you saw in the previous
 18 photograph, which is right next to the main door, where
 19 he was supported by Simon Larmour and another member of
 20 staff from Fishmongers' Hall.
 21 Q. Just pausing there. Sir, I'm about to show the image on
 22 CCTV showing Jack Merritt at the door in his injured
 23 state. I give this warning: it is a graphic image.
 24 {DC7421/29}, the bottom half of the page, please.
 25 Can we see timed at the correct time, 13.57,

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1 Jack Merritt with blood on his shirt at the front door
 2 just inside?
 3 A. That's correct.
 4 Q. We can take that off screen now.
 5 Since Jack Merritt, as we understand it, had moved
 6 straight to this area, is it fair to estimate that the
 7 attack had begun between 13.56 and 13.57?
 8 A. Yes.
 9 Q. You have told us that he was helped into the small
 10 reception office just off the entrance hall. If we look
 11 at {DC8000/59}, we'll see that. So this is the plan,
 12 and we see the steps up to the entrance hall at the
 13 bottom, the entrance hall immediately above, and to the
 14 right, a small reception office?
 15 A. Yes, that's right, that's where Jack went.
 16 Q. And {PH0050/10}, please. Do we see there a view of that
 17 reception office, so really quite a small room?
 18 A. It's a really small space, yes. The door was shut
 19 behind, as well, to protect him from Khan.
 20 Q. While he was there, was Jack Merritt given first aid by
 21 various people?
 22 A. He was, yes. As I say, Simon Larmour and a member of
 23 staff from Fishmongers' Hall, and then subsequently the
 24 police officers that attended.
 25 Q. And next, please, {DC8000/61}, please. Another page

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1 from the jury's jury bundle. Can we see here
 2 a schematic with arrows and tracks showing the movements
 3 of Jack Merritt and Saskia Jones?
 4 A. Yes, that's right.
 5 Q. So if we look to the top right we can see Jack Merritt,
 6 where he was attacked near the urinals?
 7 A. Yes.
 8 Q. And how he moved through the gentlemen's toilet, down
 9 those steps that we saw, through the lobby, across the
 10 general corridor, to the entrance hall and then down,
 11 down the page, to the main doors where we saw that
 12 photograph?
 13 A. Yes.
 14 Q. Then to the right into the reception area where we see
 15 the further orange circle.
 16 A. Yes.
 17 Q. And for Saskia Jones, we can see her initially pictured
 18 over to the upper right, just below the cloakroom, where
 19 she was attacked at the cloakroom desk, and a broken
 20 orange line tracing her path down the general corridor
 21 to the principal staircase where she collapsed?
 22 A. Yes.
 23 Q. And an area at the bottom of the stairs where she was
 24 taken to be treated?
 25 A. She was moved by those who provided her first aid to the

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1 bottom of the stairs, yes.
 2 Q. If we leave that plan on screen, please. Where did
 3 Usman Khan go immediately after attacking Saskia Jones?
 4 A. So he immediately went again in the same direction as
 5 Saskia towards the stairs, where he again attacked
 6 another member of — those in attendance on that day.
 7 Q. Was that, as we heard in the last hearing,
 8 Stephanie Szczotko?
 9 A. Yes, that's right.
 10 Q. Did she survive her injuries and go upstairs initially?
 11 A. She did. She was stabbed to the arm.
 12 Q. Where did Khan then move?
 13 A. He then made his way into the reception area.
 14 Q. If we put another image on screen, {DC8000/44}, we'll
 15 see that area.
 16 A. Yes, so you can just see the stairs through the
 17 left-hand door.
 18 Q. So we're now standing, or the photographer is standing
 19 in the main doorway to the Fishmongers' Hall, looking
 20 through into the hall. Can we see through the
 21 right-hand set of double doors, the entrance to the
 22 cloakroom and the toilets?
 23 A. That's right.
 24 Q. And through the left-hand set of doors through to the
 25 main staircase?

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1 A. Yes.
 2 Q. So Khan came through to here. Where did he go first?
 3 A. So he then approached another lady who was one of the
 4 Learning Together members of staff, Izzy Rowbotham. She
 5 was stood behind that blue desk where she had been
 6 giving out lanyards for the event on the day. Khan then
 7 attacked her several times, stabbed her several times.
 8 Q. Is it right that she suffered severe injuries but
 9 survived?
 10 A. She did, yes, thankfully.
 11 Q. Over the next couple of minutes, what happened?
 12 A. So then Khan was confronted by a number of individuals
 13 within the reception area, attendees at the event and
 14 also a member of staff who himself was also injured,
 15 Lukasz Koczocik.
 16 Q. Did those individuals seek to hold Khan at bay?
 17 A. They did, yes, they used various implements that they
 18 took from — so, for example, you can see to the right
 19 of the statue there is a kind of a spear. There should
 20 be one on the left-hand side, that was taken off the
 21 wall to be used as an implement to hold Khan at bay.
 22 Q. In addition did some of those fending Khan off use
 23 another item taken from upstairs?
 24 A. That's right, yes, sir, a narwhal tusk.
 25 Q. If we go to {DC8000/96}, we'll see a photograph of one

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1 of the narwhal tusks used, this image taken after the
 2 attack after the item had been broken?
 3 A. That's right. That was broken during the efforts of
 4 those individuals trying to fend him off.
 5 Q. If we go back to {DC8000/44}, the image we were just
 6 looking at, is it right that over the time that
 7 followed, Khan was moving back and forwards between this
 8 entrance area and the corridor just beyond that we see
 9 through the left-hand double doors?
 10 A. That's right, yes.
 11 Q. Did he, over that period, return to Ms Rowbotham and
 12 attack her again?
 13 A. He did, yes. We believe he stabbed her in the back.
 14 Q. What did he then do?
 15 A. So he then approached a member of staff who was at the
 16 front door and demanded to be let out.
 17 Q. Did the member of staff do that for him?
 18 A. He did, yes. He had a pass. It was like a pass that
 19 had to touch onto a fob to allow the door mechanism to
 20 open, otherwise it was locked.
 21 Q. If we go to {DC8000/62}, we see another plan in the
 22 jury's bundle which identifies where Stephanie Szczotko,
 23 Isobel Rowbotham, and Lukasz Koczocik were attacked with
 24 blue circles?
 25 A. Yes, that's right, yes.

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1 Q. While Usman Khan was continuing this attack in the main
2 entrance area, and while Jack Merritt was being assisted
3 in the reception office, is it right that those
4 attending on the upper floor, who had been in the
5 Banqueting Hall, had begun to discover that an attack
6 was in progress?
7 A. That's right, yes.
8 Q. Was a call then made to the police?
9 A. Yes, there was.
10 Q. Was that timed at just before 13.59; 13.58.58?
11 A. Correct, yes.
12 Q. After Khan had been let out of the main entrance doors
13 by the security guard, what did he do?
14 A. So having left and walked down the steps, he then
15 returned back to the door, which had then been locked,
16 and then decided not to enter and then walked back out
17 onto the street and turned right up London Bridge.
18 Q. If we can put on screen {DC8000/71}, if we look at the
19 images on the right, can we see Khan with those two
20 knives in his hands, first of all, moving out of the
21 doors and then turning back towards the hall?
22 A. Yes, that is right, and you can see Steve Gallant there
23 on the right—hand side, one of the attendees who fended
24 him off.
25 Q. Then {DC8000/72}, please. Can we see two images showing

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1 Khan then leaving the hall, going down the steps and
2 starting to turn right onto London Bridge?
3 A. Yes, that's correct.
4 Q. What then happened?
5 A. So having turned right, he then worked his way up
6 London Bridge, started to approach some members of the
7 public. Simultaneously, three men who were attending
8 left the hall and gave various warnings to members of
9 the public of the danger that he posed.
10 Q. {DC8000/73}, please. Looking at the upper right image,
11 can we see Khan shown in a red box, heading down towards
12 London Bridge?
13 A. Yes.
14 Q. And then Mr Gallant in that purple jumper we saw
15 earlier, carrying a narwhal tusk and coming down the
16 steps?
17 A. That's right, yes.
18 Q. Then in the bottom right image, can we see Khan engaging
19 with Mr Gallant just out of shot?
20 A. Yes, we can. Yes.
21 Q. And Mr Crilly, marked in blue, discharging a fire
22 extinguisher at Khan?
23 A. That's right, yes. He had found a fire extinguisher
24 inside and used that as a weapon to try and fend off
25 Mr Khan, and you can also see Lukasz, the member of

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1 staff who had been stabbed. You can't quite see it in
2 the photograph, but he has actually been stabbed to the
3 upper arm. He is wearing the blue short-sleeved shirt,
4 at the top of the steps.
5 Q. Where did Khan and the others then go?
6 A. So Khan, pursued by the two men, Crilly and Gallant, and
7 a further man, Mr Frost, they all moved along
8 London Bridge towards the Thames.
9 Q. If we go, please, to {DC6603/17}, can we see on the
10 upper image the route that they took out of
11 Fishmongers' Hall marked?
12 A. Yes, that's right.
13 Q. And the lower image. What then happened on
14 London Bridge?
15 A. They all went beyond what you could see in the previous
16 image, the vehicle mitigation barriers, and at that
17 point the three men initially managed to subdue Khan
18 using the fire extinguisher, the tusk, and Mr Gallant
19 there managed to sort of detain him and put him to the
20 floor.
21 Q. Is it right that the image we're looking at at the
22 moment was taken at 14.01, 2.01 in the afternoon?
23 A. That's right. By that stage a few other members of the
24 public had also become involved to try to detain Khan,
25 who was struggling violently.

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1 Q. If we go to {DC8000/64}, we can see, I think, a plan
2 showing the entrance area to Fishmongers' Hall and the
3 area where the incident took place, and a photograph,
4 an aerial photograph, showing where they were in
5 relation to each other.
6 A. That's right, yes.
7 Q. And {DC8000/65}, different perspectives, but the same
8 two locations shown?
9 A. That's right, yes. And you can just make out there's
10 actually a walkway directly underneath where Khan was
11 subdued.
12 Q. Now, you referred earlier in your evidence to some
13 hostile vehicle mitigation barriers. Are those the
14 three black ovals that we see between the main entrance
15 area and the incident area on the pavement?
16 A. That's right, yes.
17 Q. They will figure in the narrative later, I think.
18 A. Yes.
19 Q. And then {DC8000/67}, please. Can we see the location
20 of the incident area marked with a blue tent from
21 various perspectives?
22 A. That's right, yes. Obviously put there post-incident.
23 Q. So Khan had been subdued in that area by 2.01. A call
24 had been made to the emergency services a couple of
25 minutes previously. Did police officers begin arriving

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1 on the scene?
 2 A. Yes, at 14.01.59, the first police vehicle arrived,
 3 which was an armed response vehicle from the City of
 4 London Police.
 5 Q. If we can put on screen {DC8000/79}, please, we can see
 6 here a plan of the area, and do we see marked in black
 7 and labelled "Khan", the area where Khan was brought
 8 down?
 9 A. That's right.
 10 Q. We can see those hostile vehicle mitigation blockers
 11 over to the right?
 12 A. Yes.
 13 Q. And do we see there on the opposite side of the road, a
 14 car marked Trojan City 2?
 15 A. That's right, that's the armed response vehicle.
 16 Q. That's the first armed response vehicle that arrived?
 17 A. That's the first police vehicle on the scene.
 18 Q. And does that show where the vehicle stopped?
 19 A. That's right, yes.
 20 Q. Can we see, as shown in this image but in quite small
 21 writing, it carried three officers whom we're calling
 22 YX99, YX16, and WS5?
 23 A. That's right, yes.
 24 Q. Just to be clear, is this right: the reason that these
 25 and other officers have these ciphers rather than their

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1 names, is that they need to be anonymised in order to do
 2 their jobs, and the judge has made orders anonymising
 3 them?
 4 A. Yes, that's right.
 5 Q. Where did those officers go after their vehicle had come
 6 to a halt?
 7 A. So they went over the traffic island you can see there,
 8 and then moved over to where Khan was involved in the
 9 scuffle with the other members of the public.
 10 Q. When did they reach him?
 11 A. They reached him at 14.02.15.
 12 Q. Can we put on screen {DC8000/80}, please, the next page
 13 of the jury bundle. Can we see there on the right
 14 an image showing the first two of those officers, YX16
 15 and YX99, arriving by the group of people who were
 16 restraining Usman Khan?
 17 A. That's right.
 18 Q. Then were they followed shortly by the third officer in
 19 the week, WS5?
 20 A. Yes.
 21 Q. What did those officers do first when they arrived?
 22 A. So initially I believe they shouted some warnings and
 23 they tried to get some of the members of the public away
 24 from Khan so they could assess what was going on.
 25 Q. I think the last person to be removed from Usman Khan

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1 was one of the people who pursued him, Darryn Frost?
 2 A. That's right, he had to be physically removed by one of
 3 the officers.
 4 Q. And he told the jury in the first hearing, is this
 5 right, that he had been holding onto Khan in order to
 6 keep him restrained and stop him from doing any harm
 7 until the last minute?
 8 A. That's right, yes.
 9 Q. As the officers removed him from Usman Khan, what did
 10 they see and what did they do?
 11 A. Well, they noted that he had what appeared to be what we
 12 call an improvised explosive device, known as a suicide
 13 vest, around his waist area, clearly presenting
 14 a significant risk to both them and the public.
 15 Q. If we go, please, to page 84 of the jury bundle
 16 {DC8000/84}, can we see on the left-hand side of the
 17 page some still images from a body-worn video camera of
 18 one of these officers, YX16?
 19 A. That's right, yes.
 20 Q. Can we see in the first two images, the various members
 21 of the public being removed from Usman Khan, or being
 22 directed away from him?
 23 A. Yes.
 24 Q. And then in the third image at the bottom left, the last
 25 man, Mr Frost, coming away from Usman Khan?

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1 A. Yes.
 2 Q. And then, I think, the same sequence on the right, but
 3 from the different perspective of officer YX99 and his
 4 body-worn video camera?
 5 A. Yes, that's right.
 6 Q. Now, you told us that as the members of the public were
 7 removed, the officers saw what appeared to be
 8 an improvised explosive device, an IED on Khan?
 9 A. Yes, I think you can just make it out on the bottom
 10 right image, the grey kind of tape around his midriff.
 11 Q. If we go to {DC8000/97}, we will see an image of that
 12 device after it had been removed. Is that the device
 13 Khan had around him?
 14 A. It is, yes.
 15 Q. Did Khan say anything during this sequence of events?
 16 A. Yes, he shouted "I've got a bomb".
 17 Q. How did the officers respond?
 18 A. Clearly the officers shouted "Bomb", and tried to
 19 encourage members of the public to move back.
 20 Q. What did they then do?
 21 A. They then discharged their weapons. So two officers had
 22 firearms, one officer had a taser; they discharged the
 23 taser.
 24 Q. Is it YX16 who had the taser?
 25 A. That's right.

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1 Q. And did he discharge that at Khan at 14.02.49—51?
 2 A. Correct, yes.
 3 Q. At the same time, did one of the other officers, YX99,
 4 discharge his firearm?
 5 A. Yes, he discharged it twice, fired two shots.
 6 Q. Can we put on screen {DC7421/37}. If we look at the
 7 lower image, is this right, this is a still from the
 8 body-worn video camera footage of YX16, the officer with
 9 the taser?
 10 A. That's right, yes.
 11 Q. Can we see there the yellow taser at the bottom of the
 12 image being pointed towards Khan?
 13 A. Yes.
 14 Q. Can we see YX99 over to the right aiming his primary
 15 weapon, his carbine?
 16 A. Yes.
 17 Q. And WS5 pulling Mr Frost off Khan?
 18 A. Yes.
 19 Q. Can we see around Khan's lower torso that device that we
 20 looked at in the photograph earlier?
 21 A. That's right.
 22 Q. And then {DC8000/82}, please. Is this on the right
 23 an image taken from a fixed CCTV camera showing the same
 24 events a moment later?
 25 A. That's correct, yes. I think you can just about make

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1 out some smoke and the barbs from the taser.
 2 Q. So if we look at YX16, marked with an orange label, we
 3 can see the wires from the taser leading from his hands
 4 towards Khan's form?
 5 A. Yes.
 6 Q. And we can just about see some smoke to the right of
 7 YX99 and his carbine, which is out —
 8 A. That's correct, yes.
 9 Q. Then if we look at {DC8000/84}, please and look once
 10 again at the bottom left, we see the taser pointed where
 11 Khan was at this time?
 12 A. Yes, that's right, yes.
 13 Q. Then {DC8000/83}, please, looking at this photograph on
 14 the right, what happened over the seconds that followed?
 15 A. So the officers obviously identifying the potential for
 16 an IED, then retreated and tried to encourage the number
 17 of members of the public that were starting to gather to
 18 move back out of the way, and out of harm's way, in case
 19 the device exploded.
 20 Q. {DC7421/43}, please. If we look at the upper image
 21 first of all, this is a view from just north of the
 22 vehicle mitigation barriers, looking towards the
 23 confrontation with the armed officers?
 24 A. That's right. I think this is from a member of the
 25 public's phone.

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1 Q. And then lower down the page, we can see shortly
 2 afterwards as the officers have moved back, an image
 3 looking in the same direction?
 4 A. That's correct, yes.
 5 Q. And then {DC7421/44}, please. Upper image, please. We
 6 can see the officers retreating from the perspective of
 7 somebody filming from the building opposite?
 8 A. Yes.
 9 Q. During those seconds that the officers were moving away,
 10 were they giving updates to their colleagues via radio?
 11 A. That's right, yes, obviously highlighting the fact that
 12 there was an IED around the suspect's body.
 13 Q. Those words, I think, can be heard on footage at 14.03?
 14 A. Yes.
 15 Q. May we go back, please, to {DC8000/83}, and we look this
 16 time at the plan over on the left, can we see marked in
 17 green how the various officers moved?
 18 A. Yes, that's right. So obviously WS5 moved back towards
 19 the steps of Fishmongers' Hall, and then YX99 and YX16
 20 moved sort of across the traffic island to the opposite
 21 side of the road, really to try and gather some cover.
 22 Q. At this point in time, what was Khan's condition?
 23 A. He was still alive and he was still moving, but he was
 24 on the ground.
 25 Q. But he had been injured?

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1 A. He had been injured, yes, he had been shot.
 2 Q. May we now move to the second phase of the armed
 3 confrontation. Over the minutes that followed from this
 4 set of events, did further armed response vehicles
 5 arrive?
 6 A. Yes, they did, yes, four more vehicles arrived.
 7 Q. Meanwhile, were officers at the scene continuing to give
 8 updates?
 9 A. That's right, yes, updating the control room.
 10 Q. Is it right that one of those updates at 14.07 involved
 11 YX16 referring to the device as looking like one that
 12 was viable?
 13 A. That's right. He was asked to try and describe it to
 14 the officers in the control room.
 15 Q. Meanwhile, were directions being given from the control
 16 room to the officers on the scene?
 17 A. Yes.
 18 Q. Were those to clear the area both on and under the
 19 bridge?
 20 A. That's right, yes, just make the area sterile.
 21 Q. Then {DC8000/87}, please. Now, does this plan show
 22 various response vehicles over on the right with the
 23 timings of their arrivals and the officers in them?
 24 A. It does, yes, and that's a combination of City of London
 25 and Metropolitan Police officers.

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1 Q. So Trojan City 1 is marked out as the next vehicle to
2 arrive at 14.04.25, carrying AZ99, AZ14 and YX97?
3 A. That's right, yes, from the City of London Police.
4 Q. Then to the right, TJ71A at 14.06.50 carrying G108, DB55
5 and TC52?
6 A. Yes, that's a Metropolitan Police vehicle.
7 Q. All of these are armed officers, I think?
8 A. All armed.
9 Q. Then behind TJ315, arriving at 14.07.05 carrying R158,
10 Q134 and R139?
11 A. Yes, again another Metropolitan Police vehicle.
12 Q. And finally, over on the far right, TJ3N arriving at
13 14.08.26 carrying KH16 and TC92?
14 A. Yes, again, a Met vehicle.
15 Q. Was KH16 an operational commander who took charge on the
16 scene?
17 A. Yes.
18 Q. Do we see marked out with blue labels where the various
19 officers took up position in the period that followed?
20 A. Yes, so some of those officers moved to the steps and
21 were able to take cover behind the kind of side of the
22 steps, and then the others moved to across the road.
23 Q. We can see across the road, R139, R158 and Q134?
24 A. That's right, yes.
25 Q. In the time that followed, was Khan seen to make

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1 a number of movements?
2 A. He was, yes.
3 Q. And I think this is right: at 14.08.49, Khan trying to
4 get something from his jacket?
5 A. Yes.
6 Q. 14.09.01, Khan seen throwing a glove in the air?
7 A. Yes.
8 Q. 14.09.22, Khan rolling onto his back?
9 A. Yes.
10 Q. During all this time, I think, no shots were fired?
11 A. No shots were fired, no.
12 Q. By this time, is it right, just two shots had been fired
13 by the officer involved in the initial confrontation?
14 A. That's right, plus the taser.
15 Q. Plus the taser. Meanwhile, were the officers asking for
16 instructions from control?
17 A. They were, yes, and I believe an Operation Plato was
18 called.
19 Q. Just before we get to that, were officers specifically
20 asking whether a critical shot would be authorised?
21 A. That's right, yes.
22 Q. And we'll deal with the authorisation of critical shots
23 in due course.
24 You were just telling us that a declaration was made
25 of Operation Plato. Was that made by a tactical

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1 firearms commander in the control room at just before
2 14.10: 14.09.49?
3 A. Yes.
4 Q. Are you able to just explain in a sentence or two what
5 a declaration of Operation Plato means?
6 A. Yes, so a Plato is called whenever there is a marauding
7 terrorist attack and we believe there may be a risk of
8 further attacks and potentially other terrorists and a
9 series of both police and other agency responses are
10 triggered.
11 Q. And around the same time, so just before 2.10, was Khan
12 seen rolling onto his right side?
13 A. Yes.
14 Q. If we put on screen {DC7421/47}, I think we can see
15 an image from a helicopter overhead with Khan now rolled
16 onto his right side?
17 A. That's correct, yes, the police helicopter had deployed
18 and obviously got over on the top of him so were able to
19 monitor what was taking place.
20 Q. Meanwhile, were officers heard on the radio once again
21 asking for authorisation for a critical shot?
22 A. Yes, they were.
23 Q. Then {DC7421/48} of the same document, if we focus on
24 the image. Was Khan then seen to make a more
25 significant movement?

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1 A. He started to get up.
2 Q. We can see, I think, from the bottom right—hand timing
3 that this was 14.10.27, so just gone 2.10?
4 A. Yes.
5 Q. At this point, when he sat up in this way, what
6 happened?
7 A. Further shots were discharged.
8 Q. Was that by R158, across the road, and by two officers
9 near Fishmongers' Hall, WS5 and AZ99?
10 A. That's correct.
11 Q. And I think we'll see, when we see the footage, smoke
12 coming from him at that point —
13 A. Yes.
14 Q. — where shots are seen to strike him.
15 How did he react to the shots being fired?
16 A. He, having sat up, he then fell back to the floor.
17 Q. Is it right that he was sitting up for 13 seconds,
18 during which at least nine shots were fired at him?
19 A. Yes, that's correct.
20 Q. A short time after he fell to the ground was a further
21 shot fired at 14.10.49?
22 A. Yes.
23 Q. Did he then roll from his side to his back just shortly
24 after 14.11?
25 A. That's right, yes.

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1 Q. Was he then seen to make further movements?
 2 A. Yes. So at that point a wound can be seen on his face,
 3 and then he was seen bending his right leg and lifting
 4 his knee off the ground.
 5 Q. Was a further shot fired at that point in time?
 6 A. It was, yes.
 7 Q. And is this right: that a further set of shots were
 8 fired from 14.11.24?
 9 A. Yes. Four shots.
 10 Q. That, I think, after one of the officers was heard to
 11 say that he was still moving?
 12 A. Yes.
 13 Q. Shortly after that, was a significant instruction given?
 14 A. Yes. So the control room issued the authorisation for
 15 a critical shot.
 16 Q. Was that at 14.11.33?
 17 A. Correct, yes.
 18 Q. Were any further shots fired after that authorisation?
 19 A. Yes, a further shot was fired at 14.11.35.
 20 Q. What was then seen of Khan?
 21 A. So then an officer was heard to say that the male had
 22 stopped moving at 14.11.38.
 23 Q. And were any further shots fired?
 24 A. One shot was fired at 14.11.42. That was the last shot.
 25 Khan apparently moving his left arm.

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1 Q. So Khan was apparently moving his left arm at the time
 2 of that final shot.
 3 What further movements, if any, by Khan followed
 4 that?
 5 A. So there were no further movements after 14.12.06.
 6 Q. Now if we go to {DC8000/87}, we see the plan again with
 7 the officers' locations. Now, is it right that in this
 8 second phase of the confrontation, from 14.10 to 14.11,
 9 the officers who fired shots were R158, across
 10 the road --
 11 A. Yes.
 12 Q. -- at the bottom left?
 13 A. That's right.
 14 Q. And then towards the top right, on the steps, WS5 and
 15 AZ99?
 16 A. Yes.
 17 Q. Behind the cars, KH16?
 18 A. Yes.
 19 Q. And TC92?
 20 A. That's right.
 21 Q. Then if we go, please, to {DC8000/92}, can we see here
 22 marked in blue, markers showing where cartridge casings
 23 were recovered, showing the locations of shots fired?
 24 A. Yes.
 25 Q. And if we look at 19 and 20, just to the right of Khan,

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1 do those denote the firing by YX99 at 14.02?
 2 A. Yes. Those are the initial shots we can assume.
 3 Q. Then across the road, can we see a marker 21?
 4 A. Yes.
 5 Q. Does that denote the firing of a shot by R158 during the
 6 second phase?
 7 A. Yes.
 8 Q. And then do the other markers then denote shots by the
 9 other officers in the second phase?
 10 A. That's right, WS5, AZ99, KH16 and TC92.
 11 Q. If we then go to {DC8000/91}, please, can we see views
 12 from the body-worn cameras of various of the officers?
 13 A. That's right.
 14 Q. So on the bottom left, a view from R158 looking across
 15 the road, one of the officers who fired on Khan?
 16 A. Yes.
 17 Q. At the bottom right, a view from the body-worn camera of
 18 TC92, down by the cars, looking towards Khan along the
 19 pavement on the west side?
 20 A. Yes.
 21 Q. Another of the officers who fired?
 22 A. That's right.
 23 Q. And if we go to {DC8000/88}, please, we can see over on
 24 the upper right, I think, an overview image of the scene
 25 with Khan identified?

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1 A. Yes.
 2 Q. And the lower images along the bottom of the page,
 3 images from the helicopter?
 4 A. Yes.
 5 Q. So is this right: on the left we see Khan before the
 6 shots were fired in the second phase of the
 7 confrontation?
 8 A. That's right, yes.
 9 Q. Then in the middle, the point at which he sat up just
 10 when he was shot once again?
 11 A. Yes.
 12 Q. And then over on the right, an image of him after shots
 13 had been fired in the second phase?
 14 A. That's right, yes.
 15 Q. And then {DC8000/89}, if we look along the bottom can we
 16 see images taken from a fixed CCTV camera, on the left
 17 Khan lying on the floor before shots were fired in the
 18 second phase?
 19 A. Yes.
 20 Q. In the middle, Khan sitting up just at the time that he
 21 was shot during that phase?
 22 A. That's right, yes.
 23 Q. And then on the right, an image of Khan, about five
 24 seconds after he had stopped moving for the last time?
 25 A. That's right, yes.

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1 Q. We can take that off screen now.
 2 Some minutes later, after Khan had stopped moving,
 3 were explosives dogs sent in, first at 14.18 and then at
 4 14.23?
 5 A. Yes, that's right. Two separate dogs were moved
 6 forward.
 7 Q. If we can look at {DC7421/57}, please, the image on that
 8 page. Can we see the first of those dogs sent in to
 9 test the explosive?
 10 A. As a guide, yes.
 11 Q. And then {DC7421/62}, some time later at 14.41, if we
 12 look at the bottom of the page, can we see explosives
 13 officers sent in to examine Usman Khan's body?
 14 A. Yes.
 15 Q. {DC7421/63}, can we see those officers moving away,
 16 having examined it properly, at 15.01.50?
 17 A. That's correct, yes.
 18 Q. Was it then possible to send in medics to examine Khan
 19 medically?
 20 A. That's right, yes, and at 15.07, Khan's life was
 21 pronounced extinct.
 22 MR HOUGH: Sir, would that be a convenient moment for our
 23 mid-morning break?
 24 JUDGE LUCRAFT: It would, indeed.
 25 Mr Hough, what we've done so far is to obviously

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1 look at various still images. I suspect we're going to
 2 look at some of the moving images that we've got and,
 3 really, this is just to help the jury set the scene as
 4 to what is done by the various armed officers in the
 5 sequence that you have taken us through in summary with
 6 DCI Brown.
 7 MR HOUGH: Yes. We've obviously gone through that at
 8 a little speed.
 9 JUDGE LUCRAFT: Yes.
 10 MR HOUGH: We'll go through all of this again, with the
 11 moving images, and then we will obviously hear from the
 12 officers themselves later in the week going through it
 13 all from their various perspectives.
 14 JUDGE LUCRAFT: Thank you.
 15 Ladies and gentlemen, we'll take our mid-morning
 16 comfort break there. I'm going to say 15 minutes.
 17 I know it's quite a big building in getting us all
 18 around, but we'll aim for about a 15-minute break there,
 19 for a comfort break. So if you would like to follow,
 20 please, the direction you are given, you will soon
 21 become very familiar with your route into and out of
 22 your seats.
 23 Thank you very much.
 24 (In the absence of the jury)
 25 I'll rise.

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1 (11.28 am)
 2 (A short break)
 3 (11.51 am)
 4 (In the presence of the jury)
 5 JUDGE LUCRAFT: Yes, welcome back, everyone.
 6 MR HOUGH: DCI Brown, just to summarise what you just told
 7 us, is it right that in the various confrontations with
 8 Khan, a total of 20 shots were fired?
 9 A. Yes.
 10 Q. By a total of six officers?
 11 A. Yes.
 12 Q. May we now turn to the medical care given to
 13 Jack Merritt and Saskia Jones while all of that was
 14 going on. Is it right that in the reception office,
 15 which you identified earlier, Jack Merritt received
 16 first aid from civilians, and then from armed police
 17 officers?
 18 A. That's correct, yes.
 19 Q. From unarmed police officers?
 20 A. Yes.
 21 Q. After some assistance, was he then taken out of the
 22 building on a drag stretcher?
 23 A. He was, yes, and taken down to Cannon Street where it
 24 meets King William Street.
 25 Q. I think ambulances had gathered there and he received

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1 treatment in that area?
 2 A. He did, yes.
 3 Q. After a surgical procedure there, was it established
 4 that he was beyond saving?
 5 A. It was, sadly, yes.
 6 Q. As you have told us, Saskia Jones received first aid
 7 from attendees at the event at the base of the main
 8 staircase in Fishmongers' Hall. Did unarmed police
 9 officers also assist with her first aid?
 10 A. They did, yes. They gave her CPR.
 11 Q. Is it right that her condition quickly became critical
 12 and that the various efforts at CPR were without
 13 success?
 14 A. That's correct, and again, sadly her life was pronounced
 15 extinct at that location.
 16 Q. May we turn, now, to the investigations you carried out
 17 after the attack, first of all concerning the knives
 18 used in the attack, which you address from page 20 of
 19 your SIO report.
 20 Did your investigation take possession of the two
 21 knives which had been taken from Khan during the scenes
 22 on the bridge?
 23 A. Yes, both 8-inch kitchen knives.
 24 Q. You have told us that you also found one further knife
 25 in the cubicle in the gent's toilets; was that of

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1 a similar kind?
 2 A. Exactly the same, yes.
 3 Q. May we look at {DC6603/21}. This is a close-up of one
 4 the knives, {DC6603/21}, and the upper images. What can
 5 we see scratched on the blade of one of the knives?
 6 A. So very crudely it is a symbol that we have assessed as
 7 an Arabic symbol to represent God, or Allah, and that
 8 was present on all four knives. We actually recovered
 9 a further knife at the address of Khan.
 10 Q. By this time Khan had moved into his own private let
 11 address in Stafford; is that right? And the fourth
 12 knife was found there?
 13 A. That's correct, yes.
 14 Q. Looking at your paragraph 4.4, did your team carry out
 15 DNA investigations on the two knives used in the attack?
 16 A. Yes, both knives were examined and DNA profiles were
 17 found on the first knife of Saskia, Izzy Rowbotham and
 18 Lukasz, and on the second knife, profiles for
 19 Jack Merritt, John Crilly, and again, Lukasz.
 20 Q. May we now turn to the hoax suicide vest used in the
 21 attack and may we look at the image of that once again,
 22 which we see at {DC8000/97}. What did your team
 23 establish about the construction of this device?
 24 A. So the black material is actually some kind of fitness
 25 belt or slimming aid that — I think it was bought in

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1 TK Maxx or a similar type of place. Then what
 2 represents the explosive, it was actually bandages that
 3 were sealed in cling film and then tape, and then
 4 there's some wiring that comes from a battery charger
 5 and an Xbox that you can see the circuit board there, to
 6 create the illusion of what appears to be
 7 a genuine-looking suicide belt.
 8 Q. I think it also incorporated, is this right, cling film,
 9 bandages, and Gorilla Glue?
 10 A. That's right, yes, the glue is used to attach again the
 11 explosive, or what appeared to be explosives to the
 12 belt.
 13 Q. Did you establish where this had been put together?
 14 A. So the device itself was created at Khan's home address.
 15 We found other items, for example, discarded tape and
 16 wiring, in the bins and inside the address, post the
 17 attack when we went into the address and searched it.
 18 Q. We saw in one of the photographs on the bridge that this
 19 was wrapped around Khan's lower torso; is that right?
 20 A. That's right, yes, and the tape was used to wrap it
 21 tightly around his torso.
 22 Q. Did you make any conclusions from your investigation
 23 about where Khan had put it on and when?
 24 A. So my hypothesis is that he put it on on the train
 25 journey, on the journey down. The reasons for that are

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1 mainly because of the tape used would have had to have
 2 been wrapped around him at the time of applying the belt
 3 to his body. We found no discarded tape of that type in
 4 the toilets, or in Fishmongers' Hall anywhere, and we
 5 didn't find it at the home address, which would tend to
 6 suggest that it was actually disposed of on the train,
 7 and we know that on the train he visited the toilets on
 8 the train for about 7 minutes, which is quite
 9 a significant period of time to spend in the toilet
 10 cubicle.
 11 Q. We can take that off screen now. Is it right that in
 12 your investigations, your team also seized and examined
 13 a large number of digital devices, so phones, computers
 14 and so on, of people who had contact with Usman Khan,
 15 including members of his family?
 16 A. Yes, that's right.
 17 Q. Did your team also carry out a very large number of
 18 witness interviews?
 19 A. Yes.
 20 Q. Did you see CCTV footage not only from the day of the
 21 attack, but also from the period beforehand, around
 22 Usman Khan's home?
 23 A. Yes, we've recovered many hours, many hundreds of hours
 24 of CCTV footage, which we have viewed.
 25 Q. Is it right that among his other licence conditions,

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1 Usman Khan had to wear a GPS monitoring tag over this
 2 period?
 3 A. That's right, and he was wearing that at the time of his
 4 death.
 5 Q. Were you therefore able to track Usman Khan's movements
 6 using both data from his mobile phone and that tag?
 7 A. Yes, that's correct.
 8 Q. From all those investigations that you have just
 9 summarised, have you discovered any evidence that anyone
 10 else other than Usman Khan was involved in the planning,
 11 preparation or execution of this attack?
 12 A. There's no evidence. I'm satisfied he acted completely
 13 alone.
 14 Q. Did you also seek to discern whether anyone else knew
 15 about the intended attack in advance?
 16 A. Again, I'm satisfied no one else knew about the plans
 17 for the attack.
 18 Q. May we now turn to the first of our visual aids, which
 19 are presentations prepared by the Computer Aided
 20 Modelling Bureau of the Metropolitan Police for these
 21 Inquests.
 22 Did the bureau carry out a digital photographic
 23 survey of the scene both within Fishmongers' Hall and
 24 around the building?
 25 A. Yes, immediately after the attack.

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1 Q. Did they use that to prepare various of the schematics
2 we've been looking at?
3 A. That's right, yes.
4 Q. And also two animations which we will be viewing now?
5 A. Yes.
6 Q. Is it right that when we watch these, there will be some
7 signs, often fairly residual signs, of vehicles in place
8 and debris within the building?
9 A. That's right, yes.
10 Q. May we please bring up {AV0008}, which is the first
11 presentation, just over 6 minutes in length. This will
12 be the first presentation, which is an overview of the
13 scene, which begins with an aerial view.
14 A. Yes.
15 Q. If we can begin the presentation, please.
16 (Video played)
17 So we start with an aerial view over the bridge,
18 Fishmongers' Hall marked.
19 A. Yes.
20 Q. And our viewpoint will descend to road level, looking
21 across Fishmongers' Hall -- looking across London Bridge
22 at Fishmongers' Hall?
23 A. Correct.
24 Q. Pause here. (Pause).
25 We can see the main entrance to Fishmongers' Hall

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1 marked.
2 A. Yes.
3 Q. And then over to the right, camera 115 of the City of
4 London Police, is that one of the fixed CCTV cameras
5 from which we will see a number of images?
6 A. That's right, yes.
7 Q. If we play on, we'll see a sample image taken from that
8 camera during the confrontation.
9 (Video played)
10 We now move to pavement level, first looking out
11 towards the bridge. And pause here.
12 Is this a view similar to that which a number of the
13 officers would have had looking down the pavement
14 towards Usman Khan with their weapons pointed at him?
15 A. That's right, yes. I mentioned earlier about them
16 taking cover; they were taking cover behind that kind of
17 bannister area.
18 Q. Play on, please.
19 (Video played)
20 Now, move through the double doors into the entrance
21 hall.
22 A. Yes.
23 Q. With the registration desk on the left.
24 A. That's right.
25 Q. And the two double doors looking further into the

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1 building.
2 A. Yes.
3 Q. Pause there. Just identifying on the animation where
4 Isobel Rowbotham was attacked as Khan was making his way
5 back out?
6 A. Yes.
7 Q. Play on, please.
8 (Video played)
9 Identifying the pike you had pointed out had been
10 taken as a weapon.
11 A. Yes.
12 Q. Then we move through the right-hand set of double doors.
13 Pause there. Does this identify the cloakroom just near
14 where Saskia Jones was attacked?
15 A. That's correct, yes.
16 Q. If we play on, we'll now turn towards the staircase.
17 (Video played)
18 At the bottom of the staircase, does the animation
19 identify where the fire extinguisher was taken by
20 Mr Crilly?
21 A. That's correct.
22 Q. Just pause there. The animation identifying where
23 Saskia Jones collapsed and where Ms Szczotko was
24 attacked.
25 A. Yes.

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1 Q. Play on, please.
2 (Video played)
3 It also identifies where Saskia was given CPR.
4 A. Yes.
5 Q. The viewpoint of the animation then ascends the stairs
6 to the main landing. Do we see that the Banqueting Hall
7 is marked out on our left with the Learning Together
8 logo?
9 A. That's right, yes.
10 Q. Do we then enter the Banqueting Hall, panning around,
11 marking out the lectern and panel desk?
12 A. Yes.
13 Q. Then identifying 12 delegate tables by numbers in
14 a moment. Are we now moving through to the Court
15 Drawing Room, which was used as one of the breakout
16 rooms for the event between 12.30 and 1.30?
17 A. Yes.
18 Q. Just following a path around this first floor, do we now
19 move into the Court Dining Room where the brunch was
20 served at the start of the day from 11.00?
21 A. That's right. That's where we saw those earlier images.
22 Q. Is it right that we're then exiting that room into
23 a vestibule in which our view through the doors ahead is
24 back to the landing at the top of the staircase?
25 A. That's correct, yes.

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1 Q. Pause here. Are we now looking from that vestibule back
2 towards the Court Drawing Room with marked the two
3 brackets where the narwhal tusks were originally
4 situated?
5 A. That's right, yes. Darryn Frost took those off the
6 walls to use as weapons.
7 Q. If we play on again, we'll move through the vestibule to
8 the landing at the top of the main staircase, once again
9 before going down.
10 (Video played)
11 If we can pause briefly here, I think we can now see
12 the view from the area at the bottom of the stairs
13 towards the entrance hall with one set of double doors
14 obscured by the pillars and the other set just to the
15 left of that?
16 A. Yes.
17 Q. As you've told us, it's right, I think, that during the
18 confrontation with Khan, a number of the defenders, as
19 it were, were at the base of the stairs and Khan was
20 moving back and forward between the entrance area and
21 this area?
22 A. That's right, yes.
23 Q. Play on, please.
24 Now moving around to the left into the cloakroom
25 area where we see the attendance desk is marked.

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1 A. Yes.
2 Q. Then do we move through the cloakroom towards the gent's
3 toilets on the right which again is marked?
4 A. Yes, up the three steps.
5 Q. Do we now see the viewpoint panning around to show the
6 area where Saskia Jones was attacked near the cloakroom
7 desk?
8 A. Yes.
9 Q. Then I think we move around and back towards the
10 entrance hall. Pointing out where Lukasz Koczocik was
11 attacked. And the reception area, the reception office
12 marked where Jack Merritt was given CPR?
13 A. That's right.
14 Q. That's the first presentation. May we now look at the
15 second presentation, {AV0009}. Is it right that this
16 second presentation will show us Usman Khan's route from
17 the start of his attack to the time that he was brought
18 down?
19 A. That's correct, yes.
20 Q. This presentation just over four minutes in length.
21 (Video played)
22 We see the cubicle in the toilets where he armed
23 himself.
24 A. Yes.
25 Q. Moving past the area where Jack Merritt was attacked.

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1 A. That's correct.
2 Q. Then we move out of the toilets into the cloakroom area,
3 showing Usman Khan's view as he left. Then pointing out
4 the area where he attacked Saskia Jones, stabbing her in
5 the neck.
6 A. That's right.
7 Q. Then we look into the cloakroom area.
8 A. Yes.
9 Q. Before turning to the left. It shows Usman Khan's path
10 towards the main staircase.
11 A. Yes, where he attacked Steph.
12 Q. To where he attacked Stephanie Szczotko.
13 As you have told us, at this point in the sequence,
14 Usman Khan engaged with the defenders for some time as
15 he was fought off?
16 A. Yes.
17 Q. And he moved back and forth between this area, the
18 corridor area and the main entrance, first of all,
19 attacking Lukasz Koczocik in the doorway.
20 A. Yes.
21 Q. And having attacked Isobel Rowbotham just before in the
22 reception area?
23 A. That's right, yes.
24 Q. And after his engagement with the various people
25 defending others, he moves out of the main doorway, as

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1 we see?
2 A. Yes.
3 Q. Down the steps?
4 A. Yes, and turns right.
5 Q. And we see his viewpoint as he moves along the pavement,
6 past the hostile vehicle mitigation barriers, to the
7 place where he was brought down by Mr Gallant, Mr Crilly
8 and Mr Frost.
9 A. Correct.
10 Q. Pause here. Can we see now that the animation has
11 identified from an aerial position the location of the
12 various officers involved in the second phase of the
13 confrontation with Khan, and they were keeping cover on
14 him?
15 A. That's right, yes, as discussed prior to the break.
16 Q. Most of the officers near the steps of Fishmongers' Hall
17 and in the area near the cars, and those four officers
18 across the road from Khan?
19 A. Yes.
20 Q. Play on, please.
21 (Video played)
22 We see the animation climb to a full aerial view
23 before it concludes. Thank you very much.
24 May we now turn to some other visual aids. Is it
25 right that your team have prepared a compilation of

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1 videos and images in three main parts?
 2 A. Yes, that's right, yes. Footage of Khan the day before
 3 the attack, secondly, his journey from home to
 4 Fishmongers' Hall, and then finally, the events of the
 5 day.
 6 Q. I think you appreciate we're now just going to look at
 7 the third of those, the compilation of the events of the
 8 day, which is in four subsections?
 9 A. Yes.
 10 Q. And we're going to look at the second and third of
 11 those.
 12 A. Yes.
 13 Q. So may we bring up first the second part of
 14 compilation 3, {AV0015}.
 15 Sir, may I say that this compilation shows some
 16 graphic content, including at the start the footage of
 17 Jack Merritt injured through the doorway.
 18 JUDGE LUCRAFT: That was the image we saw earlier on?
 19 MR HOUGH: Exactly, but we will see a moving image now.
 20 So pause here. We're now looking at footage from
 21 the CCTV camera above the entrance door to
 22 Fishmongers' Hall at 13.56, the time, as we saw earlier,
 23 an hour fast?
 24 A. Yes.
 25 Q. And we will see, first of all, Saskia Jones re-entering

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1 Fishmongers' Hall at 13.57?
 2 A. Yes.
 3 Q. And then, shortly afterwards, Jack Merritt at the window
 4 in his injured condition.
 5 A. Yes.
 6 Q. If we play on, please.
 7 (Video played)
 8 So Saskia reenters the hall very shortly before she
 9 is to be attacked?
 10 A. Yes.
 11 Q. And then in about 45 seconds, we'll see Jack Merritt in
 12 the doorway. If we look, it's just in a few seconds.
 13 Then we see the same footage slowed down.
 14 A. Yes.
 15 Q. Pause here. I think we're now going to see
 16 a continuation of footage from the same camera, 13.58,
 17 not zoomed in. Play on, please.
 18 (Video played)
 19 If we look just to the right of the lamppost, top
 20 left of the screen, we can see a few people who are
 21 attendees of the event having a chat outside.
 22 A. That's right.
 23 Q. They include, I think, Marc Conway, Michelle Molver, and
 24 Steve Machin?
 25 A. Yes, all attendees at the event having a cigarette,

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1 I think.
 2 Q. And we will see them shortly coming back towards the
 3 entrance door, seeing what's happening inside, and then
 4 turning away?
 5 A. You can clearly see a reaction as they look through the
 6 window, yes.
 7 Q. This is the period during which the attack is going on
 8 inside the hall?
 9 A. That's right.
 10 Q. We see them moving away at speed?
 11 A. Yes.
 12 Q. Having seen the attack going on inside. Then shortly
 13 we'll see Khan leaving the building.
 14 A. That's right.
 15 Q. Actual time 14.00.43; counter time, 15.00.36.
 16 A. Yes.
 17 Q. Khan comes out with those two knives. Mr Gallant comes
 18 after him. Khan goes back up and then down the steps.
 19 We see Mr Gallant follow him with a narwhal tusk.
 20 A. Yes. You can see warnings being shouted as well by the
 21 various people following him to members of the public.
 22 Q. Pause there. Pause there, please.
 23 I think we've seen Mr Gallant using the narwhal tusk
 24 against Khan, Khan wrests the narwhal tusk from him, and
 25 it drops to the ground.

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1 A. That's right.
 2 Q. Mr Gallant in that purple jumper has come back towards
 3 the steps; yes?
 4 A. Yes.
 5 Q. Mr Crilly has come down, spraying Khan with the
 6 extinguisher to fend him off?
 7 A. That's right.
 8 Q. And towards the top of the steps we can see
 9 Lukasz Koczocik, the porter from Fishmongers' Hall, with
 10 his hand and arm in an injured state?
 11 A. Clearly injured, yes.
 12 Q. Play on, please.
 13 (Video played)
 14 We're seeing now Mr Crilly, Mr Gallant and Mr Frost
 15 all following Usman Khan down the pavement?
 16 A. That's right. You can see a second narwhal tusk in
 17 Mr Frost's hands. He's gone upstairs and retrieved the
 18 second one and come back down again.
 19 Q. Can we pause there and move on the footage to tape
 20 counter 08.24, which is footage from a different camera.
 21 I think we're now going to see footage from that
 22 fixed camera on the lamppost that we saw pointed out on
 23 the animation?
 24 A. Yes.
 25 Q. Which is a lamppost just to the north of the scene of

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1 the confrontation, on King William Street.
 2 A. Yes, that's right.
 3 Q. It's controlled by an operator, so that I think it
 4 begins by facing the junction with Cannon Street, and
 5 then moves its view towards Fishmongers' Hall and zooms
 6 in?
 7 A. Yes.
 8 Q. Play on, please.
 9 (Video played)
 10 So it moves towards Fishmongers' Hall?
 11 A. Yes, there's the steps.
 12 Q. And zooms in towards the area near the door. We'll see
 13 Khan coming out of the doors with the knives, going
 14 briefly back up, before moving back down. We saw him
 15 turn right and others following him out?
 16 A. Yes, Mr Gallant has left at this stage.
 17 Q. We see the bus blocking one's view of him and the
 18 others, but members of the public running away?
 19 A. Yes.
 20 Q. And there's Mr Gallant, Mr Frost and Mr Crilly going
 21 after Khan?
 22 A. That's right, Mr Crilly with the fire extinguisher, we
 23 saw that extinguisher.
 24 Q. Pause here.
 25 So Mr Frost on the left with the narwhal tusk --

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1 A. Yes.
 2 Q. -- Mr Crilly in the centre with the extinguisher,
 3 Mr Gallant on the right?
 4 A. Yes.
 5 Q. Is this right: we'll see Mr Frost jabbing at Khan as
 6 Mr Gallant comes in from the right and brings him down?
 7 A. Yes, he does.
 8 Q. Play on, please.
 9 (Video played)
 10 And pause there. We see that they have brought him
 11 down and they are all restraining him?
 12 A. That's right, yes, and you can see Mr Crilly trying to
 13 use the fire extinguisher to force the knives out of
 14 Khan's hands.
 15 Q. We will hear witnesses describing that scene as the fire
 16 extinguisher is brought down on Khan's hands.
 17 A. Yes.
 18 Q. Play on, please.
 19 (Video played)
 20 We will see in the seconds that followed they're
 21 joined by members of the public: Mr Meek, Mr Morgan,
 22 Mr Mumuni, Mr Conway?
 23 A. Yes.
 24 Q. Pause here. Now, over this time, I think we'll hear
 25 that a number of people were trying to get the knives

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1 out of Khan's hands, which of course were taped to his
 2 gloves.
 3 A. Yes.
 4 Q. And then in about 12 seconds, at 14.02.15, we'll see the
 5 first police officers come into view, the armed response
 6 officers from the City of London Police, YX99 and YX16,
 7 moving members of the public away from Khan?
 8 A. Yes.
 9 Q. Play on, please.
 10 (Video played)
 11 So the officers come into view. Pause here. So
 12 WS5, I think the driver of the vehicle, is the last on
 13 the scene.
 14 JUDGE LUCRAFT: Just before we move on, Mr Hough, the jury
 15 may have spotted that just to the right of the man
 16 standing almost by where we know the London Bridge sign
 17 is, there's a knife on the floor which appears to have
 18 been kicked from one of Khan's hands. We saw that in
 19 the image.
 20 MR HOUGH: Yes. Just on the floor. In fact, I think both
 21 knives were removed from his hands during this?
 22 A. I think so. I think John Crilly certainly pulls one
 23 knife away and throws it himself.
 24 JUDGE LUCRAFT: It's just that particular view it's very
 25 clear to see that it has been removed and kicked away

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1 from him.
 2 A. That's correct, sir.
 3 MR HOUGH: What we'll see in the next few seconds is that
 4 Mr Gallant, and then finally Mr Frost, move away from
 5 Khan, Mr Frost being pulled away, and then the officers
 6 react as they see Khan more closely?
 7 A. That's right.
 8 Q. Play on, please.
 9 (Video played)
 10 Pause there. I think we just saw in the last couple
 11 of seconds the taser fired by YX16, who is in the top
 12 left-hand corner of the image.
 13 A. Yes.
 14 Q. We can just see the wires leading from the taser in his
 15 hands to Khan?
 16 A. That's right.
 17 Q. And we saw some smoke as YX99's firearm was discharged
 18 at Khan?
 19 A. Yes, you could see two clouds of smoke, effectively two
 20 shots.
 21 MR HOUGH: Sir, would you like just for that to be shown
 22 again?
 23 JUDGE LUCRAFT: I think so.
 24 MR HOUGH: If we can go back by just a few seconds and play
 25 on, please.

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1 (Video played)
 2 You see the officers backing further away while Khan
 3 is moving his arms above his head and he's got his
 4 jacket in his arms?
 5 A. Yes.
 6 Q. During this period, there were no further shots being
 7 fired?
 8 A. That's right.
 9 Q. We can see now Khan holding his coat above his head,
 10 lying on his back and seeming to rummage with his hands?
 11 A. Yes.
 12 Q. I think we're now going to see footage from a CCTV fixed
 13 camera situated on a building to the north of
 14 Fishmongers' Hall, beginning at 2 o'clock.
 15 (Video played)
 16 A. Yes.
 17 Q. And at 14.00.51 we'll see Khan come down the steps of
 18 Fishmongers' Hall in the highlighted circle area.
 19 A. That's right, yes. The bus you can see at the bus stop
 20 is the very same one we'd seen in the original footage.
 21 Q. And this footage will give us a good view of the numbers
 22 of people in the area and how they move when they see
 23 Khan with the knives.
 24 A. That's right. There.
 25 Q. So there, running away.

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1 We can see the fire extinguisher smoke as it's let
 2 off in the background, there in the focused area.
 3 A. Yes.
 4 Q. If we keep watching, in about 30 seconds we'll see the
 5 first armed response vehicle, Trojan City 2, coming from
 6 the left down King William Street from the north.
 7 A. Yes.
 8 Q. It just enters the scene now. We see it drive up to the
 9 position where it stops and the officers leave the
 10 vehicle.
 11 A. Yes.
 12 Q. May we pause there and move on to tape counter 16.51,
 13 which takes us to the next clip. This is a fixed CCTV
 14 camera situated on Adelaide House, the building opposite
 15 Fishmongers' Hall.
 16 A. Yes.
 17 Q. And we'll see an area of focus again is marked out and
 18 we'll see in a few seconds Khan coming down the steps,
 19 confronted first by Mr Gallant and then by Mr Crilly?
 20 A. That's right.
 21 Q. Then we'll see him shortly after that enter the frame
 22 again, after having grasped the narwhal tusk from
 23 Mr Gallant?
 24 A. Yes.
 25 Q. Play on, please.

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1 (Video played)
 2 Pause here. I think we're now seeing footage from
 3 another fixed CCTV camera on the same building, looking
 4 towards the bridge with an area of focus marked which
 5 will show Khan circled yellow, coming into view at
 6 14.01.18, chased by Mr Gallant, Mr Crilly and Mr Frost,
 7 and then brought to the floor?
 8 A. Yes.
 9 Q. Play on, please.
 10 (Video played)
 11 About to come into view.
 12 Just pause there. I think we saw quite clearly
 13 there that Khan stopped and turned immediately before
 14 the others set upon him.
 15 Now, at 14.02.00, we'll see Trojan City 2 overtaking
 16 the bus in the southbound carriageway, and shortly after
 17 that, we'll see the three officers leaving the armed
 18 response vehicle and moving towards the scene?
 19 A. Yes.
 20 Q. Play on, please.
 21 (Video played)
 22 There's the bus. The officers are coming across
 23 the road.
 24 A. Yes.
 25 Q. At 14.02.49–51, we'll see two distinct puffs of smoke

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1 from YX99's firearm.
 2 A. That's right.
 3 Q. So in a second. Now. There. And from this perspective
 4 too we see the officers backing away?
 5 A. That's right, yes, and we see members of the public
 6 trying to clear away.
 7 Q. May we pause there and skip, please, to tape counter
 8 21.52. We're now, I think, going to see some footage
 9 from a dashboard camera on a Sainsbury's delivery van
 10 which was moving on the northbound carriageway, so on
 11 the same side of the road as the confrontation with
 12 Khan.
 13 A. Yes.
 14 Q. If we play on. We will see very shortly at 14.01.20,
 15 Khan coming into view on the pavement to the left
 16 followed by Mr Gallant, Mr Crilly and Mr Frost.
 17 (Video played)
 18 We'll see them take him down. We're seeing various
 19 members of the public going to their aid?
 20 A. Yes.
 21 Q. At 14.01.57, so in a few seconds, we'll see the first
 22 armed response vehicle, Trojan City 2, coming from the
 23 north, flagged down by Mr Bockarie in the central
 24 reservation?
 25 A. Yes.

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1 Q. And then we'll see the first three officers running
2 across the carriageway, YX16, then YX99, and then later
3 WS5?
4 A. Yes.
5 Q. We then see them from this further perspective moving
6 the members of the public and Learning Together
7 attendees away from Khan before they too move away.
8 A. Yes.
9 Q. Then at 14.02.50, so in just a few seconds, we'll see
10 a puff of smoke from YX99's firearm?
11 A. Yes.
12 Q. Now. We then see the van moves north before stopping
13 again near Fishmongers' Hall.
14 A. Yes.
15 Q. May we now move on to tape counter 25.22. Just back
16 a little. We're now going to see, I think, body-worn
17 video camera footage from YX16, who was the first
18 officer on the scene and the officer who fired the taser
19 at Usman Khan?
20 A. That's right.
21 Q. Is this right: that the screen timings are 9 minutes and
22 6 seconds fast?
23 A. That's correct, yes.
24 Q. And that there is sound on this footage?
25 A. Yes.

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1 Q. We'll begin with footage showing YX16's perspective as
2 he crosses the road from his vehicle towards the melee?
3 A. Correct.
4 Q. We'll see him approach the group at screen time
5 14.11.23, actual time 14.02.17?
6 A. Yes.
7 Q. Play on, please.
8 (Video played)
9 Pause there. I think we heard on that footage
10 shouts of "Don't you fucking move"?
11 A. Yes.
12 Q. And also one of the members of the public saying "He's
13 just killed two women in there".
14 A. Yes, I think that's John Crilly.
15 Q. And is it right that the shouts are coming from the
16 officers, so the officers shouting at Khan not to move.
17 A. That's right.
18 Q. And we'll see in a moment, YX99 holding the back of
19 Usman Khan's head, and shouts in a second that Khan has
20 a bomb before everybody moves back?
21 A. Yes.
22 Q. Play on, please.
23 (Video played)
24 Pause. So the words have been shouted "He's got
25 a bomb!" and the officers have moved back?

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1 A. Yes.
2 Q. At this stage Darryn Frost, we can see, is still holding
3 Khan down?
4 A. Yes.
5 Q. And is this right: in a moment we'll see one of the
6 officers, WS5, pulling Darryn Frost away from Khan?
7 A. Yes.
8 Q. We'll see YX16, his hands right in front, firing the
9 yellow taser at Khan.
10 A. Yes.
11 Q. And we'll see the gunshots fired by YX99 over to the
12 right.
13 A. That's right.
14 Q. And is it right that just before the taser is fired,
15 we'll also hear Khan say some words?
16 A. Yes, we believe he says "Allah Akbar".
17 Q. Play on, please.
18 (Video played)
19 Pause here. So we saw YX16, whose camera this is,
20 initially move away to the south down the bridge, and
21 then going north, and we can see the taser wires
22 trailing from the front of the taser?
23 A. That's right.
24 Q. Play on, please.
25 (Video played)

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1 The officers repeatedly shouting at Khan to stay
2 still. Pause there.
3 Is it right that on that footage just before the
4 end, there were shouts of "Stay still" from the
5 officers?
6 A. Yes.
7 Q. And was Khan heard to shout something back?
8 A. We believe he said "No, Allah Akbar".
9 Q. And I think we're now going to see body-worn footage
10 from YX99, one of the other officers, the officer who
11 fired the first shots.
12 A. Yes.
13 Q. Is it right that this is much less good quality imagery
14 because his camera has been dislodged?
15 A. Yes.
16 Q. But it gives a good impression of the view of this
17 officer, and we hear some of those words again?
18 A. You can hear exactly what's been said, yes.
19 Q. Play on, please.
20 (Video played)
21 Pause there. Again, we distinctly heard two shots,
22 slightly separated by a second or two.
23 A. Yes.
24 Q. Play on, please.
25 (Video played)

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1 And pause there, please.
 2 On this compilation, we then have various clips from
 3 footage taken by members of the public. They're
 4 generally quite short clips; is that right?
 5 A. That's right, from mobile phones.
 6 Q. If we go to the first of these, TC 33.31, so tape
 7 counter 33 and 31 seconds, we're just going to look at
 8 some of this footage.
 9 Pause here. This is footage from the inside of a
 10 vehicle on the northbound carriageway, and we'll see
 11 YX16 on the left with the taser drawn, as WS5 pulls
 12 Mr Frost off Usman Khan, and it clearly shows YX99
 13 firing the two shots?
 14 A. Yes.
 15 Q. Play on, please.
 16 (Video played)
 17 Pause here. This is footage from another vehicle in
 18 the northbound carriageway that shows the officers over
 19 Khan, it shows, again, Darryn Frost being pulled away,
 20 and again, the shots being fired?
 21 A. Yes.
 22 Q. Play on, please.
 23 (Video played)
 24 As we saw, that was footage by Mr Brendan Lacey,
 25 from whom the jury will hear tomorrow.

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1 A. Yes.
 2 Q. I think now we're about to see some footage from inside
 3 another vehicle, again in the same carriageway, again
 4 showing a confrontation, but this time at an earlier
 5 stage, the melee involving Mr Gallant, Mr Crilly and
 6 Mr Frost.
 7 A. Yes.
 8 Q. Play on, please.
 9 (Video played)
 10 Pause here. We'll now see footage from a member of
 11 the public on the east pavement of London Bridge who
 12 moves over to the west pavement, where Khan was brought
 13 down, which will show the group around Usman Khan and
 14 Trojan City 2, the first armed response vehicle driving
 15 past?
 16 A. That's right.
 17 Q. Play on, please.
 18 (Video played)
 19 Pause here. Is this right, we now have quite a good
 20 view from the perspective the officers would have had
 21 with Khan moving his jacket above his head as we saw in
 22 that footage?
 23 A. That's right, yes.
 24 Q. Play on, please.
 25 (Video played)

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1 Pause here, please. We're now, I think, seeing
 2 footage filmed by a member of the public from a building
 3 directly opposite Fishmongers' Hall. We see WS5 and
 4 YX99 moving to the north together, as we saw from that
 5 other perspective, then YX16 moving alongside them in
 6 the northbound carriageway?
 7 A. Yes.
 8 Q. Play on, please.
 9 (Video played)
 10 Pause here. We're now looking at footage from
 11 a member of the public directly opposite
 12 Fishmongers' Hall, and do we again see YX16 with WS5 and
 13 YX99, so the same moment as on the previous footage, but
 14 from a different perspective?
 15 A. Yes.
 16 Q. Play on, please.
 17 (Video played)
 18 Pause here. This is some more footage from the
 19 building filmed opposite Fishmongers' Hall, which will
 20 shown Khan on the ground, rolling onto his back with his
 21 hands moving in his jacket?
 22 A. Yes.
 23 Q. Will we then move the viewpoint to where the three
 24 officers are near the vehicle barriers?
 25 A. Yes.

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1 Q. As they cover Usman Khan and then the viewpoint moving
 2 back to Khan?
 3 A. That's right.
 4 Q. Play on, please.
 5 (Video played)
 6 Then finally, pause here, I think we're going to see
 7 footage from a vehicle in the southbound carriageway, so
 8 the opposite side from Usman Khan, showing the second
 9 armed response vehicle to arrive on scene, Trojan
 10 City 1, arriving and pulling up in the northbound
 11 carriageway.
 12 A. Yes.
 13 Q. Play on, please.
 14 (Video played)
 15 If we end there.
 16 Could we now move to -- I'm just noticing the time,
 17 sir.
 18 JUDGE LUCRAFT: Yes.
 19 MR HOUGH: We're about to move to the third part of the
 20 audio-visual compilation, which address the second part
 21 of the armed confrontation. As you know, sir, there's
 22 a fair substantial chunk of footage from a police
 23 helicopter.
 24 JUDGE LUCRAFT: Yes.
 25 MR HOUGH: It's probably best that that's seen in one go and

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1 so I was going to suggest a slightly earlier than usual
 2 lunch break.
 3 JUDGE LUCRAFT: We will pause there, Mr Hough. We're going
 4 to sit this afternoon at 2.10, so, ladies and gentlemen,
 5 we'll break there for lunch and we'll sit again, please,
 6 at 2.10. Thank you very much.
 7 (In the absence of the jury)
 8 MR HOUGH: Sir, as you know, we have two members of the
 9 public giving evidence today.
 10 JUDGE LUCRAFT: Yes.
 11 MR HOUGH: They are relatively brief witnesses, but we have
 12 to hear from them today because they can't return
 13 tomorrow.
 14 JUDGE LUCRAFT: Would an idea be once we've completed the
 15 helicopter footage to interpose them and then come back
 16 to DCI Brown?
 17 MR HOUGH: That probably is a good idea. The jury, I think,
 18 have heard enough in order to understand. We could
 19 probably fit them in as well as DCI Brown, but I don't
 20 want to risk them going overnight.
 21 JUDGE LUCRAFT: I know that DCI Brown is going to be here
 22 throughout, so to some extent I would much rather
 23 inconvenience him than two members of the public who
 24 can't be here tomorrow, and I know that DCI Brown will
 25 understand that.

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1 It may be well be that once we've dealt with those
 2 two we can complete DCI Brown's explanations too, but
 3 I suggest we take that approach.
 4 MR HOUGH: Thank you, sir.
 5 JUDGE LUCRAFT: I'll rise.
 6 (12.57 pm)
 7 (The short adjournment)
 8 (2.13 pm)
 9 (In the absence of the jury)
 10 JUDGE LUCRAFT: Mr Hough, can I just mention before the jury
 11 come back in that I have received a letter from
 12 David Attfield, the legal director of the BBC. What
 13 I'm going to ask is that Ms Lester provides a copy for
 14 all interested persons. Other than spelling my name
 15 incorrectly, it is a fulsome apology and an explanation
 16 as to what happened, but I'll make that available.
 17 Particularly, Ms Barton, I think your clients would wish
 18 to see it, so, as I say, it will come to all interested
 19 persons.
 20 MS BARTON: Thank you very much, sir.
 21 (In the presence of the jury)
 22 JUDGE LUCRAFT: Thank you very much, Mr Hough.
 23 MR HOUGH: DCI Brown, we're just now going to move to the
 24 third part of audio—visual compilation 3, {AV0016},
 25 please, which depicts the second phase of the armed

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1 confrontation from after 14.02. If we can begin and
 2 just pause right at the start as soon as we see
 3 an image. Pause.
 4 Now, are we seeing here footage from a police
 5 helicopter, National Police Air Service, which is sent
 6 to the scene?
 7 A. Yes, that's right. I think they were -- at the time of
 8 the incident they were actually hovering over
 9 Westminster Abbey filming a demonstration, so they were
 10 very close by and were able to deploy pretty quickly.
 11 Q. We can see timing in the top left—hand corner, 14.05.37?
 12 A. Yes.
 13 Q. That's correct timing, I think?
 14 A. That's correct, yes.
 15 Q. We will see they are diverted to the scene a few minutes
 16 after the first shots have been fired and we'll hear
 17 audio confirming that shots have been fired.
 18 A. Yes.
 19 Q. Is it right that we'll hear over the audio some messages
 20 given by radio from officers at the scene?
 21 A. Yes.
 22 Q. And some messages given back the other way by the
 23 control room?
 24 A. Yes.
 25 Q. If we play on, please.

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1 (Video played)
 2 The words "Shots fired" as well.
 3 Pause, please. I think we just heard there Trojan
 4 City 1 and Trojan City 2 confirm that they were on the
 5 scene?
 6 A. Yes.
 7 Q. Play on, please.
 8 (Video played)
 9 Pause there. Can we see now that the helicopter has
 10 reached a point over London Bridge and has just obtained
 11 confirmation from the officers at the scene that they
 12 have containment from cover?
 13 A. Yes.
 14 Q. Play on, please.
 15 (Video played)
 16 Pause there. Have we heard reference to a device,
 17 so a believed explosive device on the suspect?
 18 A. Yes, you can hear him describing it with the wires on
 19 display.
 20 Q. Have we also heard the control room asking about how far
 21 members of the public are away from the device?
 22 A. That's right, yes.
 23 Q. Now, we're now seeing the camera focusing in on
 24 Usman Khan. We'll see in the seconds that follow, his
 25 arms moving above his head, and then we'll hear,

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1 I think, instructions given for the officers to direct
2 the public away and make the bridge a sterile area?
3 A. Yes.
4 Q. Play on, please.
5 (Video played)
6 Pause there. So have we heard officers asking for
7 instructions about precisely where they should leave the
8 scene empty and sterile?
9 A. Yes.
10 Q. And instructions given by the control room?
11 A. Yes, I think initially we heard a controller/operator,
12 and now we're hearing from the tactical firearms
13 controller who is in the control room, and that officer
14 would at some stage have access to this footage beamed
15 into the control room.
16 Q. Now, at this point, 14.08.22, so in just a couple of
17 seconds, we'll see Khan rolling over onto his right
18 side, rummaging in his jacket with his left hand?
19 A. Yes.
20 Q. We'll hear the control room officer asking if Khan has
21 anything in his hands, and then we'll see Khan moving
22 his hands in the area of his jacket, and we'll see the
23 vest more clearly?
24 A. Yes.
25 Q. We'll also, I think, hear reference to this being

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1 an apparently viable IED.
2 A. Yes.
3 Q. Play on, please.
4 (Video played)
5 Pause there, please. So the reference is to
6 an apparently viable IED, and previous to that were the
7 questions being asked about whether he was moving for
8 something such as a trigger?
9 A. Yes.
10 Q. Do we now at 14.09.22–23 see that he's rolled onto his
11 back, and I think then we'll see him continuing to move?
12 A. Yes.
13 Q. Will we then, again, hear a further update, again,
14 a reference to a viable IED, and further directions for
15 containment from cover?
16 A. Yes.
17 Q. And then I think at 14.09.45 we'll hear the Operation
18 Plato declaration, that declaration which you have told
19 us is the catalyst for a series of tactics to deal with
20 a marauding terrorist attack.
21 A. That's right.
22 Q. Play on, please.
23 (Video played)
24 Pause there, please. I think we've just heard, so
25 just after 14.10, reference to armed response vehicles

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1 being sent to rendezvous points to the north and south
2 of the bridge?
3 A. That's right, yes.
4 Q. We've seen Khan roll onto his right side?
5 A. Yes.
6 Q. And I think shortly, 14.10.16, we'll see him roll over
7 onto his other side?
8 A. Yes.
9 Q. We'll hear more comments spoken about a viable IED
10 strapped to him?
11 A. Yes.
12 Q. And then will we at 14.10.27 see him sit up and at
13 around the same time the helicopter camera zoom out to
14 see where he is on the bridge?
15 A. That's right, yes.
16 Q. And is it at this time when he sits up at 14.10.27 that
17 the first further shots are fired?
18 A. That's true, yes.
19 Q. The first shots since 14.02?
20 A. Yes.
21 Q. And I think at 14.10.40–42, after having been sitting up
22 for 13 seconds, he will go back down again?
23 A. Yes.
24 Q. Play on, please.
25 (Video played)

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1 Pause there. Can we see, if we look to the extreme
2 right of the image, three police officers in position
3 covering him from the opposite side of the road?
4 A. Yes.
5 Q. As we've heard, one of those officers fires in this
6 engagement?
7 A. Yes.
8 Q. Play on, please.
9 (Video played)
10 Pause there. It's now just after 14.11. We can see
11 the signs of further gunshot injuries to him?
12 A. Yes, to his face.
13 Q. We can see that he's still moving, just after 14.11?
14 A. Yes.
15 Q. That there has been discussion over the radio of
16 possible authorisation of a critical shot?
17 A. Yes.
18 Q. But so far that authorisation has not actually been
19 addressed by the control room?
20 A. That's right.
21 Q. I think we'll hear the critical shot authorisation at
22 14.11.28 —
23 A. Yes.
24 Q. — on this video footage over the audio?
25 A. That's right.

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1 Q. As you have told us before, were further shots to be
2 fired both before and after that authorisation?
3 A. Yes, they were.
4 Q. Play on, please.
5 (Video played)
6 Pause there. 14.12.14. The camera has zoomed in on
7 Usman Khan again, and he is not seen to move again; is
8 that right?
9 A. No. That's right.
10 Q. And in the period that was before that, we heard the
11 control room giving instructions for members of the
12 public to be evacuated below the bridge?
13 A. Yes, you could see there were a number of people
14 underneath.
15 Q. As you have told us, the officers in the control room
16 had access to this footage so they could see there were
17 people under the bridge and were giving directions for
18 them to be removed.
19 A. Yes.
20 Q. Play on, please.
21 (Video played)
22 And pause there.
23 Sir, as you have indicated, DCI Brown is to pause
24 his evidence here.
25 JUDGE LUCRAFT: Yes.

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1 MR HOUGH: And be recalled either later today or tomorrow
2 morning, after our two civilian witnesses have given
3 evidence.
4 JUDGE LUCRAFT: Yes. Members of the jury, we're going to
5 move from this bit of evidence to listen to two people
6 who were there at the time. I think you have now got
7 the scene firmly clear in your minds as to what was
8 happening, so we will pause with the investigation
9 material there, and we'll listen to the first of the two
10 witnesses.
11 MR HOUGH: Sir, the first witness is Stevie Hurst.
12 MR STEVIE HURST (sworn)
13 JUDGE LUCRAFT: Good afternoon, Mr Hurst.
14 A. Good afternoon.
15 JUDGE LUCRAFT: If you wish to take a seat, please do so.
16 A. I appreciate it, thank you.
17 JUDGE LUCRAFT: There's a microphone on that desk which will
18 help to amplify your voice.
19 A. I understand.
20 JUDGE LUCRAFT: It's very likely that some documents or
21 images, some plans will be shown to you. They will
22 appear either on the big screen or on the little screen
23 in front of you.
24 A. I understand.
25 JUDGE LUCRAFT: Thank you.

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1 Questions by MR HOUGH QC
2 MR HOUGH: Would you please give your full name for the
3 court record.
4 A. My full name is Stevie Paul Hurst.
5 Q. Mr Hurst, do you understand I'm asking you questions
6 first on behalf of the Coroner and you may then have
7 some questions from other lawyers?
8 A. I understand.
9 Q. By way of background, in November 2019 did you work for
10 a tour company called Small Car Big City which gave
11 tours in Mini Cooper cars?
12 A. Yes, that's correct, yes.
13 Q. Were you in the London Bridge area on 29 November 2019
14 driving one of the company's Mini Coopers?
15 A. Yes, I was.
16 Q. Was your colleague, Tom Gray, with you, driving
17 a similar car that day?
18 A. Yes, he was, yes.
19 Q. At just before 2 o'clock on that afternoon, where were
20 you?
21 A. So we had just finished a job and we decided to go to
22 Borough Market to have some lunch, so we had some lunch
23 and we had a pick-up at about 2.30 that afternoon at
24 Liverpool Street. So from Borough Market to Liverpool
25 Street the natural course that we took was

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1 London Bridge, so we were heading south to northbound at
2 about 2 o'clock.
3 Q. Were you driving in convoy with Mr Gray?
4 A. Yes, that's correct, yes. I was driving just behind
5 him; he was leading.
6 Q. May we please put on screen {PH0002/24} and you will see
7 an aerial view for a point over the middle of the
8 bridge.
9 A. Yes.
10 Q. Is it right that you would have been driving in the
11 carriageway we see over on the left, the middle of the
12 screen --
13 A. Yes.
14 Q. -- the northbound carriageway?
15 A. Yes, that's correct, yes.
16 Q. We see a bus lane on the extreme left, and then two
17 other lanes. Which lane were you driving in?
18 A. So we were driving in the middle lane. You can see the
19 only two classic Mini Coopers there on the bridge. They
20 are quite prominent.
21 Q. I was about to get to that.
22 A. Oh, sorry.
23 Q. We can see your and Mr Gray's Mini Coopers immediately
24 to the right of the upper of the two buses, can we?
25 A. That's correct, yes.

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1 Q. Where had you reached on your way across the bridge when
2 you became aware of something unusual or amiss? Had you
3 reached as far as we see in the photograph or further
4 back?
5 A. Pretty much exactly there, if I'm honest with you. We
6 thought it was just after halfway and by that picture
7 I'm guessing that's correct, and it was completely
8 standstill traffic, which is quite normal for a day in
9 London, around 2 o'clock on a Friday, so we were just
10 completely stationary, so pretty much exactly there.
11 Q. As you were in the stationary traffic in approximately
12 that position, what happened to draw your attention?
13 A. London Bridge has got the central reservation so it's
14 quite unusual for people to cross the road, and
15 especially run across the road on London Bridge. Of all
16 the years I've done this, and being a born and bred
17 Londoner, it's very unusual, so I just felt drawn to
18 what would be potentially be on the left. I didn't see
19 what was going on because, as I said, there were a lot
20 more cars there from what that picture is showing you,
21 it was completely standstill traffic, so seeing the
22 people running away from something, I just felt the need
23 to get out of the car and investigate.
24 Q. So first of all, you saw people running away from
25 something?

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1 A. Yes.
2 Q. Where were those people? Where did you see them first?
3 A. As I said, this is pretty much the exact spots where we
4 left the cars to get out, so I'm guessing just to the
5 right of the first Mini there's that silver car, so
6 people running across in a diagonal direction from the
7 tent area across in a diagonal fashion to the
8 southbound.
9 Q. So running from the west pavement towards the east and
10 across the road?
11 A. Yes. Yes.
12 Q. Were there many people?
13 A. Probably about five to 10 people. I didn't count or
14 anything like that, but it was enough to get my
15 suspicion aroused. It's not just a group of people, it
16 was just random people and these people were running
17 with some pace, more so than normal; they're not just
18 running for a train.
19 Q. Now, you say you were sufficiently concerned to get out
20 of your car?
21 A. Yes.
22 Q. What was Mr Gray doing?
23 A. He was in his car. By the point where we got onto
24 London Bridge, what happens is when we're doing these --
25 when we're in Minis and stuff, we're enjoying it so we

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1 swapped positions and I started to lead, that's
2 generally what happens, we'll just switch it up, just so
3 we can let other people in -- let ourselves in so we're
4 staying in convoy as much as possible.
5 So I got out of the car -- I still don't know why --
6 but my colleague Tom, he saw me get out and decided to
7 follow me. We joined the company at the same time, so
8 we've become very good friends during that period, so he
9 felt like the need to come and help me out, I guess.
10 Q. So as you get out of your car in front and he gets out
11 of his car behind --
12 A. Yes.
13 Q. -- what could you see in the area of the pavement on the
14 left?
15 A. Not really anything until I hurdled the side of the road
16 there's a slight -- it goes up to about your waist,
17 there's barriers, the metal barriers on the side, so
18 I had to kind of hurdle that until I got onto the
19 pavement and then started running towards what was going
20 on. So I hadn't really seen anything until I made my
21 way onto the pavement.
22 Q. May we go to {PH0002/26}, please, which gives us
23 a slightly more focused view. You say that you ran up
24 the pavement that we see on the left towards the area
25 where the blue tent is?

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1 A. Yes.
2 Q. As you ran up that pavement, what could you see?
3 A. I saw a commotion of people. My first instinct was
4 there's just a fight happening, and I've always felt the
5 want to help if anything like that arises. I always
6 feel like if there's a situation going on, I'd like to
7 be the guy that intervened and if I was intervening I'd
8 like for people to back me up, so in this particular
9 instance, I wanted to be one of those people that wanted
10 to help. So I went over and I saw about five gentlemen
11 on top of one person.
12 Q. Was anybody saying anything at this point?
13 A. So the five gentlemen on top of the other guy were
14 staying that he'd stabbed two people and that they were
15 dead, and they were screaming that he'd stabbed them and
16 the gentleman on the floor was screaming "Get off, get
17 off".
18 Q. Could you notice anything about the man on the floor,
19 his appearance, what he was wearing, what he was
20 carrying?
21 A. He was wearing tan Timberlands, I remember that very
22 much. He was wearing a very skin-tight black lycra
23 cycling top kind of thing, very skin-tight, and he had a
24 balding patch, which was quite prominent, and a beard.
25 Q. In your witness statement, you describe seeing blood on

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1 his tan Timberland boots; do you remember that detail?
 2 A. Yes. I did, yes.
 3 Q. Could you remember anything about his hands and whether
 4 he was carrying anything?
 5 A. Yes. I remember him having knives in either — both of
 6 his hands, and one of them at least had duct tape,
 7 electrical silver duct tape over his hands to keep,
 8 I guess, the knife in his hand so nobody could dislodge
 9 it. I remember seeing that quite vividly.
 10 Q. As you took in this focused scene, what was going
 11 through your head, what did you think was happening?
 12 A. Well, considering that you sort of see this stuff in
 13 films and what not, it's quite difficult to kind of
 14 process when you're thrown into a fight or flight
 15 situation, but I felt the need to want to help these
 16 guys. Seeing the knives and blood on the knives
 17 I wanted to try and help them subdue this person as best
 18 I can with as little as I could. I was just stationed
 19 at the head of this gentleman on the floor, so I —
 20 there's only a little — there was only a very little
 21 I could do, so I was just trying to help these guys as
 22 best I could to make sure that nothing bad happened
 23 anymore.
 24 Q. What do you do initially to help them?
 25 A. I just wanted to keep an eye on it. I also just kind of

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1 put a foot in to try and help, I believe Tom also did
 2 quite similar to myself, but, you know, it's a tricky
 3 situation to be in, but the only thing I could see of
 4 him once I was up close was the top of his head, so...
 5 Q. Did you make contact with your foot against his head?
 6 A. Very light contact and it was very, very quick. It was
 7 more out of shock, it was more of adrenaline, and then
 8 I backed off. It was not a normal situation to kind of
 9 be in.
 10 Q. Of course. What was Mr Gray doing at that point, as far
 11 as you could see?
 12 A. He was standing just to the right of me, and he was
 13 trying to help dislodge the knife from the gentleman's
 14 hand that was just to the right of me, which would have
 15 been his left hand.
 16 Q. In your witness statement you describe him kicking at
 17 the arm to release the knife?
 18 A. Yes, that's correct, yes.
 19 Q. May we put on screen {DC6603/17}, the lower part of the
 20 page. This is a still image. I appreciate this is from
 21 a very different perspective, but does this give us
 22 an impression of the scene as you were on hand, seeking
 23 to help subdue this man?
 24 A. Yes, as you can see, it's quite chaotic. That's me on
 25 the left. You can make me out by my very obvious long

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1 green jacket and flat peak, so making my way over there
 2 just trying to understand what was going on.
 3 Q. We can take that image off screen now.
 4 Shortly afterwards did something happen to change
 5 the scene and to change the dynamic?
 6 A. Coming from the northbound side across the road,
 7 literally within, maybe even 30 seconds, no more than
 8 that, two or three police officers had already made
 9 their way to the scene, which was incredible, and then
 10 began to shout and try to get as many of us off and away
 11 from him as possible to be able to control the
 12 situation.
 13 Q. Could you tell anything about what the officers were
 14 carrying, what equipment they had?
 15 A. At least two of the officers had rifles, and one of them
 16 had, I believe, a taser. Obviously this is a few years
 17 ago now, but yes, from my recollection at least one of
 18 them had a taser, the other two had rifles.
 19 Q. May we have on screen {DC7421/33}, the image on that
 20 page. The jury have seen moving footage of this part of
 21 the scene. We see there that there were three officers
 22 on the scene. You described them shouting for people to
 23 get off the man. What did you and the others do in
 24 response to those commands?
 25 A. We tried to back off as best we could. We both

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1 dispersed north and south away until there was one
 2 person left on the gentleman, and I think — well, as
 3 you can see, the third police officer tried to rip him
 4 off him as best as possible.
 5 The problem is, you know, once he had let go, then
 6 the gentleman, the suspect, would be able to still cause
 7 some sort of form of damage, so it was quite
 8 a precarious situation.
 9 Q. Were you looking on as the final man moved away?
 10 A. Yes, I'm at the top of this picture, just out of shot,
 11 I'm still very close to the situation.
 12 Q. Page 37, please, of the same document {DC7421/37}, lower
 13 image, please. From your perspective, this would be
 14 a viewpoint similar to yours?
 15 A. Yes, I would have been just behind this particular
 16 gentleman, so that's the last guy that the police
 17 officer is trying to drag off so they can try and
 18 control the situation.
 19 Q. We can take that off screen now.
 20 In the moments that followed, what did you do, or
 21 where did you go?
 22 A. So I was still situated still very much behind that
 23 particular police officer, maybe 10 or 15 metres just
 24 further south of that particular position, still on the
 25 same side of the bridge, and I'm standing next to

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1 a gentleman that I later found out was an off-duty
 2 police officer that had taken one of the knives away
 3 from the suspect and so we were standing sort of next to
 4 each other. There's a moment where you kind of freeze,
 5 you have no idea what to do so, and a lot of the time,
 6 you know, it's a car crash situation where you kind of
 7 just stare, so I was kind of just stuck in the moment.
 8 Q. Now, the man you were near, the British Transport Police
 9 officer, he is somebody who I think had removed a knife
 10 from the suspect and he moved away from the scene?
 11 A. That's correct, he was holding it to his side,
 12 I'm guessing trying to signify to the police officers
 13 that he's just trying to keep it away from the suspect,
 14 and just trying to move away just to make sure it's out
 15 of reach of -- so no more injuries can be inflicted.
 16 Q. Meanwhile we have the police officers, as we saw in the
 17 image, have been removing people from the suspect. Did
 18 you see what happened next?
 19 A. Yes, so the situation is obviously very difficult for
 20 the police officers, and I saw that first hand and
 21 that's the reason why I'm here today and that's the
 22 reason why I gave my information in, because how the
 23 police dealt with it was brilliant, but the situation,
 24 I stepped back, as I said, and I was just by the
 25 off-duty police officer, and the police were screaming

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1 to the suspect to stay down.
 2 Q. How was he reacting to those commands?
 3 A. Sorry?
 4 Q. How was he reacting to those commands?
 5 A. He was rolling around on the floor trying to get himself
 6 up off the floor by putting his arm back to try and lift
 7 himself up. So he was not listening to any of the
 8 commands being issued by the police officers.
 9 Q. How did the officers react?
 10 A. So they at that point had seen the vest, that we'll call
 11 it, the bomb vest, at the time, so they had screened
 12 that out and therefore got back at a certain distance to
 13 make sure that they dealt with it properly. He
 14 persisted to try and get himself up off the ground and
 15 the police officers shot him with the taser, and he was
 16 able to still try and get himself up from that, so then
 17 they fired two to three shots into the suspect.
 18 Q. The way you have described it, the taser is fired and
 19 then the shots are fired; is that the order in which you
 20 recall things happening?
 21 A. As far as my memory recollects, there's obviously been
 22 a lot that's happened in the world since 2019, but yes,
 23 as far as I can remember, the police officers dealt with
 24 it in that particular situation. They issued -- they
 25 gave him so many chances and issued so many warnings to

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1 the suspect to stay down so they can try and control the
 2 situation, but the suspect had it in his mind to be able
 3 to just -- well, he just didn't want to listen, at all.
 4 Q. Did you see the effect of those weapons being fired?
 5 A. Yes. I still very vividly remember the blood mist from
 6 the shots. It's still very much in my head. I can
 7 picture it quite clear.
 8 Q. Did you see the taser probes strike as well?
 9 A. Yes.
 10 Q. What did the man on the ground, Usman Khan, then do?
 11 A. He was rolling around on the floor. I'm still standing
 12 there, the police officers are trying to get a perimeter
 13 area, there's a lot of people trying to video-record,
 14 and the police officers are trying to keep an eye on the
 15 suspect as well as try and get people back so I then
 16 proceeded to try and move people away as he was writhing
 17 around on the floor. He then grabbed his jacket and was
 18 trying to reach around for his bag and the police
 19 officers believed that he was maybe reaching for another
 20 weapon.
 21 Q. Just pause there. I don't think you can speak to what
 22 the police officers themselves believed?
 23 A. Sure, I apologise.
 24 Q. But you saw that he was grabbing for his coat?
 25 A. Yes.

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1 Q. How did the police officers physically react, as far as
 2 you could see?
 3 A. So they stepped further back to be able to try and
 4 control the people that were around, and the police
 5 officers with the bomb vest still very much on view,
 6 they believed that he may have had another weapon, maybe
 7 even a gun.
 8 Q. Well, again, I'm not --
 9 A. Sorry, I apologise. Sorry.
 10 Q. I do understand it may seem obvious to you what was
 11 going through the police officers' heads. They will
 12 tell us that.
 13 A. Sure. Sure.
 14 Q. Where did you go at this point?
 15 A. I then jumped back -- at this point I then jumped back
 16 over into the road, over the side barrier, and jumped
 17 into the road to try and put myself, you know, within
 18 a distance, so if anything did go off I had -- there was
 19 cars to be able to protect myself, so I was just
 20 situated there. At that point I didn't -- I still
 21 didn't move away but I felt I wanted to try and keep as
 22 many people away as possible.
 23 Q. Did you stay there long?
 24 A. Yes, so I was there probably for a -- it all happened so
 25 quickly, but in the moment, it feels like it goes on

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1 forever, but I was there maybe for a couple of minutes
 2 but it felt a long time.
 3 Q. Where did you go from there?
 4 A. So I was situated, you know, just in the middle of
 5 the road, very much near where our cars were, maybe
 6 a little bit further back, and my colleague, Tom, was
 7 speaking to some children in the back of a bus that was
 8 just to the right of us, and we managed to get them to
 9 drive over the central reservation and drive southbound
 10 to get out of there, so we were trying to calm that
 11 situation down with everybody that was there and Tom was
 12 trying to calm the children down from the back of the
 13 bus.
 14 I then made a phone call right there and then to my
 15 other half, only got through to her voicemail, so I left
 16 a voicemail, obviously a very stressful one, and then
 17 there was a pop, or a bang.
 18 Q. Where was the sound coming from, as far as you could
 19 tell?
 20 A. It was coming over from that particular situation, from
 21 the area of the suspect. I couldn't see much because
 22 I had positioned myself behind a few cars, as well as
 23 the double decker bus that's pictured a little bit
 24 earlier.
 25 Q. If we go back to that picture, it's {PH0002/24}. Were

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1 you further back from your vehicles or in the area of
 2 your vehicles?
 3 A. So I was positioned in the right-hand lane now standing
 4 behind the --- it's not there anymore, as I said, we
 5 managed to get the driver to drive over the central
 6 reservation and drive off that had children on it, but
 7 I was standing there so at a diagonal angle I was
 8 situated there so I couldn't see much anymore at this
 9 particular point until I heard that.
 10 Q. You heard a pop or bang from the direction of ---
 11 A. Yes, that's correct.
 12 Q. --- where Khan was?
 13 A. Yes. Yes. From where --- I don't know exactly, but it
 14 was over in that particular direction, where the
 15 situation was happening, I saw a --- and then
 16 I managed --- I remember seeing sort of debris fly up
 17 into the air. I don't know what it was, but in my mind
 18 I thought maybe the vest.
 19 Q. Did you remain there or did you move away?
 20 A. At that particular point we went over to the other side,
 21 on the east side of the bridge, and started heading
 22 southbound. It was at that moment where we felt like
 23 this situation has escalated to the point where we now
 24 need to get out of here.
 25 Q. And did you leave the bridge as you went?

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1 A. Yes, so we went southbound towards the Shard,
 2 London Bridge, and we proceeded to run as quickly as we
 3 could, and there was lots of other people there with me,
 4 including my colleague Tom.
 5 MR HOUGH: Thank you, those are all my questions. I'll just
 6 look to the right to see if any others have questions
 7 for you.
 8 I see not.
 9 JUDGE LUCRAFT: No.
 10 MR HOUGH: Thank you very much. Those are all the questions
 11 we have for you, Mr Hurst. We are very grateful for you
 12 coming to give evidence.
 13 A. Thank you. I appreciate it.
 14 JUDGE LUCRAFT: Thank you very much indeed, Mr Hurst.
 15 A. Thank you.
 16 MR HOUGH: Sir, the next witness is Tom Gray.
 17 MR THOMAS GRAY (affirmed)
 18 JUDGE LUCRAFT: Good afternoon, Mr Gray. If you are happy
 19 to, please do feel free to remove your mask. If you
 20 want to leave it on, that's fine.
 21 Mr Gray, the jury may well have seen you were
 22 sitting in court whilst your colleague was giving
 23 evidence. Just to explain, there's no difficulty in
 24 that, that's perfectly correct and right, but you would
 25 have heard me say to your colleague, but I repeat to

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1 you, some images, some photographs will appear on the
 2 screen, either in front of you, the small screen, or the
 3 larger screen, whichever is easier to look at.
 4 A. Okay, thank you.
 5 Questions by MR HOUGH QC
 6 MR HOUGH: Would you please give us your full name formally
 7 for the record?
 8 A. My full name is Thomas Andrew Gray.
 9 JUDGE LUCRAFT: Mr Gray, I'm just going to ask whether the
 10 microphone --- you might just move it a little bit closer
 11 to you or move your chair a little bit closer to the
 12 desk, whichever is easier.
 13 A. Is that better for you?
 14 JUDGE LUCRAFT: That's great. Thank you very much.
 15 MR HOUGH: Thank you.
 16 Mr Gray, you understand I'm asking questions on
 17 behalf of the Coroner?
 18 A. I do.
 19 Q. As we have just heard from your colleague, Mr Hurst, did
 20 you, in November 2019, like him, work for Small Car Big
 21 City, a tour company giving tours in Mini Cooper cars?
 22 A. Yes.
 23 Q. Were you, as he has told us, driving a Mini Cooper car
 24 that day in the London Bridge area on 29 November 2019?
 25 A. Yes.

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1 Q. Just before 2.00 pm that day, were you travelling north
2 over London Bridge from the Borough Market area in
3 convoy with Mr Hurst?
4 A. Correct.
5 Q. May we put on screen {PH0002/24}, a photograph we were
6 looking at just a few moments ago. Can you confirm that
7 you were in convoy with Mr Hurst in the middle lane in
8 the two Mini Coopers we see just to the right—hand side
9 of the upper red bus?
10 A. Yes, I was driving the white Mini.
11 Q. So at the time we're concerned with, you were driving
12 behind?
13 A. Yes.
14 Q. Where had you reached, as far as you can recall now,
15 when something happened to draw your attention?
16 A. Where the cars are in the picture is, you know, where
17 they were when we were in standstill traffic.
18 Q. Was the traffic at that point, initially heavy and
19 effectively gridlocked as Mr Hurst has told us?
20 A. It was, indeed.
21 Q. What first did you see or hear to draw your attention?
22 A. So the first thing that drew my attention to something
23 not being quite right were sort of a group of people
24 fleeing from the left carriageway, as pictured, sort of
25 over and around the cars, over the central reservation

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1 and sort of southbound over London Bridge.
2 Q. Looking at the people, could you tell anything about
3 their demeanour, how they appeared to be?
4 A. As my colleague said earlier, very distressed, and
5 running as quickly as they could.
6 Q. Did you see anything of the left—hand pavement from
7 inside the vehicle?
8 A. The first thing that drew my attention after civilians
9 fleeing was a sort of puff from a fire extinguisher,
10 that was sort of the first thing that I saw.
11 Q. After that moment, after seeing the puff from a fire
12 extinguisher, could you see anything else in the same
13 area?
14 A. A group of gentlemen running after somebody. That was
15 about it.
16 Q. Now, in your witness statement, you refer to seeing
17 a dark—skinned man on the western pavement, being chased
18 by at least two other men; is that right?
19 A. It says that in my statement. I wouldn't have been able
20 from that distance to tell, you know, what colour skin
21 it was. I would have said — I'm pretty sure I wouldn't
22 have said that, but one chap being chased by four, five
23 people.
24 Q. So one man being chased by a number of people and the
25 fire extinguisher being let off around him?

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1 A. Correct.
2 Q. What did you think was happening at first?
3 A. I thought there was a fight going on. It's Friday,
4 2 o'clock, coming out from the City, somebody could have
5 lost a lot of money, they're having a fight, that's what
6 I thought was going on.
7 Q. What did you then do?
8 A. So at that point, just after seeing the puff from the
9 fire extinguisher and the people fleeing, just took the
10 keys out the ignition, put the handbrake on of the car
11 and sprinted towards the tented area.
12 Q. Could you see what Mr Hurst was doing?
13 A. So Stevie, like myself, hopped out of the car. He
14 double—backed because he left the keys in the car, so
15 I arrived to the tent a little bit before Stevie.
16 Q. You say you arrived at the tent; obviously the tent
17 itself wasn't there at that point?
18 A. Of course.
19 Q. As you reached the west pavement and got closer, what
20 more could you tell about the scene?
21 A. So when I arrived on the scene there was the suspect
22 sort of in a turtle—like position with his head facing
23 towards Tower Bridge, so to the east. There was
24 probably three or four gentlemen on top of the suspect,
25 people yelling, screaming and shouting what had

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1 occurred, and, you know, one chap hitting him with what
2 is now perceived as a narwhal tusk.
3 Q. May we have on screen {DC7421/32}. Now, this is the
4 scene from a different perspective with somebody
5 striking Usman Khan with a narwhal tusk. We know that's
6 Darryn Frost. Does this resemble the scene you came
7 upon?
8 A. That looks very similar to what originally alerted me to
9 what was going on, yes.
10 Q. By the time that you were on scene, you say that
11 Usman Khan was on the floor in a turtle—like position.
12 What were the men around him doing?
13 A. They were sort of screaming and shouting what had
14 happened. Darryn Frost is labelled. I can only assume
15 that he still had the narwhal tusk at that point, was
16 sort of hitting at his hands, trying to release the
17 knives that were in his hands, and a few bystanders sort
18 of further northbound passed those sort of flow
19 barriers.
20 Q. May we go, please, to {DC7421/33}. Sorry, that's the
21 wrong reference. Sorry {DC6603/17}. Lower image,
22 please. This is an image we looked at with Mr Hurst of
23 the scene when he arrived. Had you already arrived by
24 this point?
25 A. I had already arrived at this point, yes.

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1 Q. What could you see of Usman Khan beyond the fact that he
2 was on the floor?
3 A. I could see that he had black hair and that he was
4 wearing sort of either a black or a navy coat, and that
5 he had a knife in each hand.
6 Q. Could you hear what was being said by others around him?
7 A. A lot of swearwords, but essentially that he had stabbed
8 or killed two people, of that effect, and the suspect
9 was asking everybody to get off him.
10 Q. What did you then do?
11 A. So I sort of kicked at what would be his left hand to
12 try and free one of the knives. Somebody who was sort
13 of in the frog pile that is on top of the suspect
14 managed to free one of the knives much more successfully
15 than myself. After that happened, the knife was sort of
16 kicked towards sort of the northbound side of where
17 everything is going on, closer to the bottom of the
18 image, and I decided to try and pick up the knife, give
19 it to the police when they arrived.
20 Q. Were you successful in picking up the knife?
21 A. No.
22 Q. After you had gone to collect the knife, what then
23 happened?
24 A. So after I went to go and collect the knife, I turned
25 back around and the police had arrived.

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1 Q. May we have {DC7421/37}. The lower image we see is the
2 police in the early stages of the confrontation. Where
3 were you in relation to this scene?
4 A. Where it's all blurred.
5 Q. So further to the north?
6 A. Yes.
7 Q. What could you see?
8 A. At this point I could just see the police and, as you
9 can see in the image, pulling people off of the suspect
10 at this point.
11 Q. Could you hear anything being said by the police or
12 anyone else during this stage?
13 A. So people were shouting at the police what the suspect
14 had done, the police were instructing the suspect to
15 stay down, to not move. Then after that, as we can see
16 in that image, what has now been said is a hoax vest,
17 they alerted us to the fact that he had a vest on.
18 Q. So a point came when they appeared to notice that he had
19 something that looked like an explosive device?
20 A. Correct.
21 Q. And they alerted people around?
22 A. Correct.
23 Q. What did they do or say to alert people?
24 A. From that they said: he's got a bomb, he's wearing
25 a bomb, something to that effect: run, move, and at that

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1 point I jump out from where it's blurry, over the
2 barriers, and back towards where our Mini Coopers are
3 parked.
4 Q. We can take the image off the screen now. Where did you
5 go on the bridge after you had jumped over the security
6 barrier at the side of the pavement?
7 A. So I made my way back to the cars because
8 I'm responsible for them, so I wanted to make sure that
9 no harm would come to them, and hid behind a school bus,
10 as my colleague alerted, is no longer in the picture
11 that we saw earlier.
12 Q. May we have the general photograph of the scene back,
13 please, {PH0002/24}. You have moved away from the area
14 where we now see the lower blue tent, you had gone over
15 the barrier at the side of the pavement. How far across
16 the road did you go?
17 A. I can remember I went — seeing that BMW X5 police car,
18 around to the right as it's pictured, and back down
19 towards where there is now a gap between what looks to
20 be a Volkswagen Touran and a Ford Transit van.
21 Q. So roughly opposite the upper of the two red buses?
22 A. Yes, so in between that and the sort of tipper truck
23 that is there.
24 Q. So you are now on the opposite side of the road and some
25 distance south from the scene of the confrontation. As

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1 you moved away over that distance, did you hear or see
2 anything?
3 A. So as I was making my way back towards the second bus,
4 around where I was by the BMW X5 police car, I heard one
5 shot be fired as the suspect looked or appeared to be
6 getting up off of the floor.
7 Q. Did you hear anything said from the area of the
8 confrontation?
9 A. Just the command of "stay down" repeated over and over.
10 Q. Where did you then go or continue to go?
11 A. After hearing the first gunshot, I made my way back
12 towards where the tipper truck and the second bus are.
13 As stated previously, there was a smaller school bus,
14 and I hid sort of behind that, just trying to reassure
15 the children in the back that everything would be fine.
16 Q. From that position did you have any view back towards
17 where Usman Khan had been confronted by members of the
18 public and then the police?
19 A. A very, very hazy image through the first bus, that
20 would be about it.
21 Q. Could you see whether he was moving any more?
22 A. No. I was alerted to the fact that he was moving by
23 what the police were saying.
24 Q. What were they saying?
25 A. So they were saying that "he's got a gun, move back",

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1 whether or not this is true or not, they were just
 2 saying that he had a gun, move back. So I used the
 3 tipper truck as cover after the school bus had moved.
 4 Q. After you had signalled to the children in the school
 5 bus and then spoken to the driver about moving it away,
 6 what did you do?
 7 A. So after signalling that everything would be fine, just
 8 little okay hand symbols, the bus turned around and made
 9 its way south over the bridge. There was then a chap
 10 who had also helped move the bus and get it over the
 11 central reservation, looking very distressed, sort of
 12 chap looked like in his mid-30s, shaggy beard, was
 13 clearly in a lot of distress saying he had seen somebody
 14 be shot, and we both just sort of sought refuge, for
 15 want of a better term, behind this tipper truck.
 16 Q. How long did you remain there behind the tipper truck?
 17 A. Anywhere between 30 seconds to two minutes. It was
 18 a long time ago, very sort of adrenaline pumping, it's
 19 hard to put a time on it.
 20 Q. What did you then do?
 21 A. Pardon?
 22 Q. What did you then do?
 23 A. What did I then do? Just hid behind the bus until
 24 I heard what I've described in my statement as sort of
 25 a "dull thud", and upon hearing that, Stevie and I were

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1 very close at that point and just decided that it was
 2 probably a good time to get off the bridge, jumped onto
 3 the south side carriageway and ran as fast as I could.
 4 Q. As you were running south, could you hear anything more
 5 behind you?
 6 A. So I described in my statement that it sounded like 15
 7 shots, or a volley of shots, but on reflecting, it could
 8 have just been people's shoes smashing into the
 9 carriageway as we were running away.
 10 Q. Did you, along with Mr Hurst, as he has told us, head in
 11 the direction from the Shard from there?
 12 A. We did, yes, so we ran towards London Bridge station up
 13 towards the upper concourse via the sort of tunnel
 14 network and up to the front of the Shard from there,
 15 yes.
 16 MR HOUGH: Thank you very much, Mr Gray, those are my
 17 questions. Again, I'll look to see if anyone has any
 18 questions.
 19 No, thank you. Those are all our questions for you.
 20 Thank you very much.
 21 A. Thank you very much.
 22 JUDGE LUCRAFT: Thank you very much indeed for coming.
 23 A. You're more than welcome.
 24 MR HOUGH: Sir, I was going to revert to DCI Brown's
 25 evidence but it is probably a convenient time for our

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1 mid-afternoon break.
 2 JUDGE LUCRAFT: Shall we take a break then. We'll then come
 3 back to DCI Brown and the other parts of the background
 4 that he's going to tell us about, but we'll take our
 5 mid-afternoon break there. Thank you.
 6 (In the absence of the jury)
 7 JUDGE LUCRAFT: Mr Hough, it seemed sensible to take a break
 8 there. I appreciate to some extent we are getting a new
 9 jury familiar with the routine that we have all become
 10 accustomed to over the last few weeks, but I think the
 11 plan for the rest of the afternoon is to, if we can,
 12 complete DCI Brown's evidence. If we don't and it's
 13 a convenient time for us to break, and I would think,
 14 bearing in mind it's Day 1, we might finish at about
 15 4.15, perhaps today, and then I know we've got various
 16 witnesses timetabled for tomorrow, but the important
 17 thing is I think we will get through those without any
 18 difficulty tomorrow.
 19 MR HOUGH: Tomorrow looks like it will be quite a light day.
 20 We built in deliberately additional time in these first
 21 two days because of the difficulties that one sometimes
 22 encounters with a new hearing and a new jury.
 23 JUDGE LUCRAFT: Yes. I think also, Mr Hough, in fairness to
 24 us all, we weren't also entirely sure whether we would
 25 finish the previous Inquests at the end of last week,

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1 and so it was important not to have too many witnesses
 2 timetabled for the first few days. I think the most
 3 important thing is that by Thursday when we begin to
 4 hear from the police officers, we really need to get
 5 through those in the time that we've set aside for them.
 6 MR HOUGH: Yes.
 7 JUDGE LUCRAFT: And I'm fairly confident we will do so, so
 8 we do have that bit of flexibility today and tomorrow.
 9 I'll rise.
 10 (3.17 pm)
 11 (A short break)
 12 (3.33 pm)
 13 (In the presence of the jury)
 14 JUDGE LUCRAFT: Yes, Mr Hough.
 15 MR HOUGH: Sir, we're reverting to the evidence of
 16 DCI Brown.
 17 DCI DAN BROWN (continued)
 18 Questions by MR HOUGH QC (continued)
 19 MR HOUGH: Mr Brown, you appreciate you're still under oath?
 20 A. Yes.
 21 Q. We had been covering the part of the audio-visual
 22 compilation dealing with the second phase of the armed
 23 confrontation from 14.05 onwards, and we had looked at
 24 footage from the police helicopter. May we now move to
 25 the next part of that compilation, have up on screen

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1 {AV0016}, and at tape counter 07.40, so 07.40 on the
 2 tape counter.
 3 Just pause there. I think we're about to see some
 4 more footage from the camera 115 of the City of London
 5 Police fixed to a lamppost to the north of
 6 Fishmongers' Hall?
 7 A. Yes.
 8 Q. Once again, this is a camera controlled by the operator
 9 which can focus on the scene?
 10 A. Yes.
 11 Q. And we'll see, I think, the footage begin just after
 12 2.04, after Khan has been shot in the first round of
 13 shots, and the officers have pulled back?
 14 A. Yes.
 15 Q. Play on, please.
 16 (Video played)
 17 We'll just see a short passage of footage with Khan
 18 initially in position. Can we see Khan lying on his
 19 back and removing his jacket from his arms?
 20 A. Yes.
 21 Q. May we please move forward to tape counter 11 minutes,
 22 45 seconds, so 11.45. Play on.
 23 (Video played)
 24 It's now 14.08.21, we see Khan roll onto his right
 25 side?

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1 A. That's right, yes.
 2 Q. And is this right: at 14.09.01, we'll see him rummaging
 3 in his jacket and discarding a glove?
 4 A. Yes.
 5 Q. Is this right: at 14.09.45, we'll see him roll onto his
 6 other side, as we saw from the helicopter?
 7 A. Yes.
 8 Q. Play on, please.
 9 (Video played)
 10 May we please pause there. It's now 14.10, and will
 11 we see at 14.10.27 Khan sitting up after moving his
 12 hands?
 13 A. Yes.
 14 Q. And then in the following seconds, a number of puffs of
 15 smoke around him as he is shot again?
 16 A. Yes, that is right.
 17 Q. And then after having sat up for 13 seconds, we'll see
 18 him fall back down at 14.10.41?
 19 A. Yes.
 20 Q. Before signs of him writhing again?
 21 A. Yes.
 22 Q. We'll see some further movements until about 14.12.06.
 23 A. That's right, that's the last movement.
 24 Q. Play on, please.
 25 (Video played)

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1 We now see him sit up just at the moment when the
 2 shots are about to be fired.
 3 Pause there. We just saw some shots, signs of shots
 4 being fired into his body, smoke around his body.
 5 A. Yes.
 6 Q. Play on.
 7 (Video played)
 8 We are about to see the last movements, the last
 9 signs of any movement.
 10 May we now skip to, on the tape counter, 29.20.
 11 We're now watching further footage from the CCTV camera
 12 fixed above the entrance to Fishmongers' Hall.
 13 A. Yes.
 14 Q. And at screen time, 15.08.12, real time 14.08.19, we'll
 15 see officers beginning to take up position in this area,
 16 taking cover as you have indicated earlier?
 17 A. That's right.
 18 Q. Play on, please.
 19 (Video played)
 20 This is, again, before the shots are fired in the
 21 second phase of the armed confrontation?
 22 A. That's right.
 23 Q. We will see AZ99 take up position at the top of the
 24 steps marked out there, TC52 at the bottom of the steps,
 25 both facing towards Khan with their firearms at the

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1 ready?
 2 A. Yes.
 3 Q. Also marked, WS5, one of the officers involved in the
 4 initial stand-off with Khan?
 5 A. That's right.
 6 Q. And KH16, towards the bottom of the steps, the tactical
 7 commander?
 8 A. Yes.
 9 Q. Pause here. We're now just at screen time 15.09.19,
 10 which is real time 14.10.26.
 11 A. Yes.
 12 Q. This is just around the time that Khan is sitting up
 13 again. We see G108 at the bottom step, TC52 a couple of
 14 steps up, AZ99 towards the top.
 15 A. Yes.
 16 Q. And if we play on, please.
 17 (Video played)
 18 Sorry, this is a little before Khan sits up again.
 19 Can we pause there. Now, the screen time is now
 20 15.10.10, the real time, 14.10.17. At screen time
 21 15.10.23, real time 14.10.30, I think we'll see
 22 an ammunition cartridge come from the firearm of AZ99,
 23 the officer at the top of the steps?
 24 A. That's right, yes.
 25 Q. Then followed by three further cartridges at screen

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1 times 15.10.27, 15.10.32, and 15.11.17.
 2 A. Yes.
 3 Q. So we'll see him fire four times. Play on, please.
 4 (Video played)
 5 The first of them firing at the time that Khan sits
 6 up that first time?
 7 A. Yes.
 8 Q. There.
 9 We are about to see the final cartridge come out of
 10 his primary weapon.
 11 A. Yes.
 12 Q. There.
 13 In around a minute's time, we'll see AZ99 leave his
 14 position while G108 and TC52 remain in position further
 15 down the steps.
 16 A. Yes.
 17 Q. May we move from there to tape counter 35.03. I think
 18 we're now about to see some footage from a fixed camera
 19 on Adelaide House opposite Fishmongers' Hall and facing
 20 south across King William Street?
 21 A. That's right.
 22 Q. Play on, please.
 23 (Video played)
 24 We'll see YX99, YX16 and AZ99 crossing from the east
 25 to the west side of the carriageway, directing members

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1 of the public away.
 2 A. Yes.
 3 Q. This is all taking place at 14.04.30, so about eight
 4 minutes before the events we were watching in the last
 5 clip.
 6 A. That's correct.
 7 Q. May we then move to tape counter 38.50. We'll see
 8 officers moving across the road. If we look at the top
 9 right of the screen, we'll see R139 and R158 entering
 10 the screen from the north with a ballistics shield, and
 11 YX16 from the east, all forming a group and moving south
 12 together, joined by Q134.
 13 A. Yes.
 14 Q. Play on, please.
 15 (Video played)
 16 Pause there. If we look to the top left—hand
 17 corner, I think we can see the tour bus or school bus,
 18 which Mr Hurst and Mr Gray told us performed a U—turn
 19 over the central reservation?
 20 A. That's right, yes.
 21 Q. And the officers we're seeing just at the vehicle
 22 barriers closest to us, those are officers with firearms
 23 who are going to provide cover on Khan from the opposite
 24 side of the road?
 25 A. Yes.

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1 Q. Play on, please.
 2 (Video played)
 3 We can see those officers have positioned themselves
 4 directly across the road from Khan with the ballistic
 5 shield propped on the vehicle barrier at the side of the
 6 pavement?
 7 A. Yes.
 8 Q. If we skip here, please, from here to tape counter 43
 9 and 50 seconds, we are seeing KH16, AZ99 and DB55
 10 entering the frame from the north at 14.12.53, so this
 11 is after the final shots have been fired?
 12 A. Yes.
 13 Q. We'll see them moving on foot along the southbound
 14 carriageway of London Bridge, shortly followed by TC92.
 15 A. Yes, that's right.
 16 Q. Play on, please.
 17 (Video played)
 18 If we now move to tape counter 50 and 29 seconds,
 19 50.29 seconds. We're now looking at footage filmed from
 20 a building opposite Fishmongers' Hall. Just pause
 21 there. We'll hear an initial shot and then four in
 22 quick succession, then two further shots, one after the
 23 other, before the camera focuses on the officers on the
 24 steps.
 25 A. Yes.

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1 Q. Play on, please.
 2 (Video played)
 3 Pause there. So those were shots, I think, fired in
 4 the period between, I think, 14.10 and 14.11.
 5 A. Yes.
 6 Q. May we now skip forward to tape counter 52.55, 52
 7 minutes and 55 seconds, and we're going to watch
 8 body—worn video footage from G108, an officer who stood
 9 at the base of the steps of Fishmongers' Hall during the
 10 second phase of the confrontation, but did not, I think,
 11 fire any shots.
 12 A. No, that's right.
 13 Q. And if we play on, we'll see first of all G108 moving to
 14 the steps and taking up position at the bottom.
 15 (Video played)
 16 Pause there. Did we hear the words "Looks like
 17 an IED" spoken between the officers?
 18 A. That's right, yes.
 19 Q. And it's now just after 14.09, so a little before the
 20 first shots will be fired during the second phase?
 21 A. That's right.
 22 Q. And I think we'll hear in the seconds that follow some
 23 instructions being requested, and discussion about
 24 whether a critical shot will be authorised?
 25 A. Yes.

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1 Q. And then we'll hear reference to the device being "all
2 taped up" and "wires on the device".
3 A. Yes.
4 Q. Play on, please. Pause, please.
5 JUDGE LUCRAFT: I am just conscious that some of the jury
6 are having to strain, because of the sunlight streaming
7 through, and I'm not sure whether we might, for this --
8 I am just going to suggest those who are really
9 straining might just move over and use some of the seats
10 on the other side just to see the footage.
11 A MEMBER OF THE JURY: I can see the footage.
12 JUDGE LUCRAFT: You can see fine, can you?
13 Gentleman at the front, are you all right, or would
14 you prefer to? Please do so. I'm sorry, I should have
15 spotted that before.
16 MR HOUGH: The rest of us have got used to the celestial
17 spotlight.
18 JUDGE LUCRAFT: Yes, one shouldn't worry about the sun too
19 much because we haven't seen much of it, but if you are
20 looking at the screen -- I hope that's easier for you.
21 Thank you.
22 MR HOUGH: Thank you, if we can play on, please.
23 (Video played)
24 Pause there. So we just heard "all taped up,
25 there's wires", spoken with some urgency?

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1 A. Yes.
2 Q. I think we're about to hear now voices asking for
3 authorisation for a critical shot --
4 A. Yes.
5 Q. -- at 14.10.08 and 14.10.15, and then we'll pause just
6 before Khan sits up at 14.10.26. So play on, please.
7 (Video played)
8 Pause here. It's now 14.10.24. In a couple of
9 seconds, Khan will be sitting up and we'll hear the
10 officers speaking about this, about him getting up and
11 about his hands.
12 A. Yes.
13 Q. We'll hear shots heard, an officer shouting "get down",
14 and further shots heard; is that right?
15 A. That's right.
16 Q. Then in the following period we'll hear shouts and
17 exchanges between the officers about whether Khan is
18 moving and references to further movements.
19 A. Yes.
20 Q. Play on, please.
21 (Video played)
22 Pause there, please. So that's the period of about
23 13 seconds while Khan was sitting up, and I think we
24 heard about eight or nine shots during that period.
25 A. That's right.

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1 Q. From this position just at the base of the steps to
2 Fishmongers' Hall?
3 A. Yes.
4 Q. And we saw there were a number of firearms officers
5 there, and we'll hear about their firing as the Inquest
6 goes on.
7 Is this right: we'll hear a number of further shots,
8 and can I just ask you to confirm this, one shot heard
9 at 14.10.47?
10 A. Yes.
11 Q. Another at 14.11.12?
12 A. That's right.
13 Q. Four more at 14.11.23?
14 A. Correct.
15 Q. One more at 14.11.33?
16 A. Yes.
17 Q. And then a further exchange is heard between the
18 officers about whether Khan is moving.
19 A. Yes.
20 Q. Then 14.11.41, a final shot heard?
21 A. That's right.
22 Q. Play on, please.
23 (Video played)
24 Pause there, please. So we heard the final shot at
25 14.11.41, shortly followed by a shout of "cease fire"?

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1 A. Yes.
2 Q. Then I think at 14.11.58 we will hear this officer,
3 G108, the officer whose body-worn footage this is,
4 giving an update that there is a suspect on the bridge
5 and shots fired?
6 A. That's correct, yes.
7 Q. Play on, please.
8 (Video played)
9 We're now, I think, going to watch body-worn video
10 footage from TC92 -- pause here, please -- beginning
11 with the officer taking cover behind a vehicle near the
12 entrance to Fishmongers' Hall; yes?
13 A. Yes.
14 Q. This is an officer who was going to fire a shot?
15 A. Yes.
16 Q. We'll see him first of all move forward to join KH16,
17 taking cover behind one of the vehicles?
18 A. Yes.
19 Q. And then at 14.11.11, we'll hear a shot?
20 A. That's right.
21 Q. 14.11.16, we'll see him tap the shoulder of KH16 to
22 notify him of his presence and then shouts of "still
23 moving".
24 A. That's right.
25 Q. Play on, please.

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1 (Video played)
 2 Pause. It is now 14.11.21. I think we're about to
 3 hear three or four more shots fired, the last of which
 4 apparently by this officer?
 5 A. Yes.
 6 Q. And then at 14.11.32, a further single shot fired?
 7 A. That's correct.
 8 Q. Play on, please.
 9 Now, pause here. We'll see at 14.11.40 a further
 10 single shot fired, apparently by this officer, TC92, the
 11 last shot?
 12 A. The last shot, yes.
 13 Q. Play on, please.
 14 (Video played)
 15 The final footage to be watched with your evidence,
 16 a clip from the body-worn video footage of R158, who
 17 we'll see from 14.07 taking up position against the wall
 18 running alongside Fishmongers' Hall?
 19 A. Yes.
 20 Q. Play on, please.
 21 (Video played)
 22 This is an officer who we'll see fire one shot?
 23 A. Yes.
 24 Q. Pause here. Just to explain, is this right, there isn't
 25 audio for part of this footage, but the audio is clicked

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1 on as we go.
 2 A. Yes, that's right.
 3 Q. Play on, please.
 4 (Video played)
 5 So he is now south of the steps to the entrance.
 6 We'll hear an exchange between this officer and another
 7 confirming that the suspect has a vest on.
 8 Pause here. So are we seeing this officer, R158,
 9 along with colleagues, going forward to take ballistics
 10 shields from a vehicle, and then moving across the
 11 central reservation to the east side of London Bridge?
 12 A. That's right.
 13 Q. We'll see him move into position with his firearm
 14 targeted on Khan?
 15 A. Yes.
 16 Q. Play on, please.
 17 (Video played)
 18 It's now 14.09 and we'll hear at 14.09.47 this
 19 officer, R158, asking if Khan has an IED, and another
 20 officer, YX16, one of those first on the scene, who is
 21 now behind him confirms that Khan does have an IED?
 22 A. That's right.
 23 Q. So that will be in about 20 seconds, that exchange.
 24 Pause here. It's now 14.10.21. At 14.10.26, that's
 25 the time that Khan sits up --

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1 A. Yes.
 2 Q. -- we have heard again, and we'll hear a shot fired at
 3 that point.
 4 A. Yes.
 5 Q. And is it right that in the period that follows, we'll
 6 hear multiple further shots fired and several rounds,
 7 and this officer, R158, firing one shot at 14.10.39.
 8 A. That's correct.
 9 Q. Play on, please.
 10 (Video played)
 11 Pause here. So we heard R158 say that he'd fired
 12 a shot at 14.10.41, and then a further shot heard at
 13 14.10.47?
 14 A. Yes.
 15 Q. Is it right that we'll hear further shots at 14.11.11,
 16 14.11.22 multiple shots, and 14.11.40, a final shot?
 17 A. That's correct.
 18 Q. Play on, please.
 19 (Video played)
 20 And stop there, please, and we can take the footage
 21 down.
 22 Just some concluding questions, please, DCI Brown.
 23 We've seen parts of a larger compilation. Is it
 24 right that the footage we've watched is part of
 25 compilations which have been prepared by your officers

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1 from an enormous amount of footage viewed?
 2 A. That's correct, yes. We've recovered just under
 3 200 hours of body-worn video alone, and then additional
 4 CCTV, again, many more hundreds of hours we've had to
 5 review, and then obviously identify the most relevant.
 6 Q. Are you able just to give us an idea of the scale of
 7 your investigation to tell us approximately the number
 8 of statements your team has taken?
 9 A. Yes, we've taken 1,084 statements in this investigation.
 10 Q. And the number of exhibits?
 11 A. 1,789 exhibits.
 12 Q. And the number of documents seized?
 13 A. 2,877.
 14 Q. Those figures in addition to documents separately
 15 obtained by the Inquests team through the process of
 16 disclosure?
 17 A. That's correct, yes.
 18 MR HOUGH: Thank you very much. Those are all my questions.
 19 May we see if others will have questions for
 20 DCI Brown, just for his preparation for tomorrow --
 21 JUDGE LUCRAFT: Yes.
 22 MR HOUGH: -- although we'll hear those questions tomorrow?
 23 I see heads shaking.
 24 So DCI Brown, your evidence is concluded for the
 25 moment. I think you appreciate that you will be back to

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1 give us evidence on some other topics later?
 2 A. I do, thank you.
 3 MR HOUGH: Thank you very much.
 4 JUDGE LUCRAFT: Mr Hough, we will pause there for today and
 5 we'll pick up tomorrow morning on other evidence to be
 6 called.
 7 Ladies and gentlemen, thank you very much indeed for
 8 coming back today, and for being here in good time.
 9 Can I repeat my request: we'll endeavour to start,
 10 please, at 10 o'clock tomorrow morning, and it may be --
 11 I make no firm promises -- but it may be that tomorrow
 12 is a shorter day than today. I think, Mr Hough, that's
 13 looking likely on the timetable.
 14 MR HOUGH: That is, yes.
 15 JUDGE LUCRAFT: But that's for good reason because we then
 16 go into the firearms officers themselves the day after
 17 tomorrow and we don't really want to have a witness
 18 which causes us any difficulty with us getting through
 19 those officers when they start to come to give evidence.
 20 You will soon get used to the routine and you will
 21 soon get very used to the running of this building but,
 22 again, if I could -- you were very good earlier on
 23 following instructions, the front row go one way, the
 24 back row go another way, Laura and Jo will direct you so
 25 you go the right way.

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1 Whatever you have got planned for the rest of the
 2 day, the evening, can I simply make this request which
 3 the last jury got very tired, I suspect, of me saying,
 4 but it's quite important: just press a sort of mental
 5 pause button in your minds, get about whatever you have
 6 planned for this evening, tomorrow we will take those
 7 fingers off our pause buttons and resume on listening to
 8 the evidence together tomorrow morning. Thank you very
 9 much.

(In the absence of the jury)

I'll rise.

(4.20 pm)

(The court adjourned until 10.00 am on
Wednesday, 2 June 2021)

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