

**IN THE INQUESTS ARISING FROM THE DEATHS AT THE FISHMONGERS' HALL  
AND LONDON BRIDGE ON 29<sup>th</sup> NOVEMBER 2019**

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**SUBMISSIONS OF PARVEEN BEGUM  
regarding jury conclusions**

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1. Mrs Begum provides these short submissions to assist the Court as regards the correct approach to jury conclusions.
2. Counsel to the inquest does not suggest that the jury should be invited to return any critical conclusion about the family of Usman Khan. It is understood that no other interested person will disagree with this approach.
3. The approach of counsel to the inquest in this regard is, with respect, correct. There is no evidence on which the jury could fairly or safely conclude that any act or omission on the part of the family of Usman Khan caused or contributed to the tragic deaths of Jack Merritt and Saskia Jones. Insofar as it is necessary to do so, Mrs Begum will address this point further in oral submissions.
4. For present purposes, it is noted that:
  - a. Usman Khan's family visits were considered to be a positive feature of his case by Mi5<sup>1</sup> and the probation service.<sup>2</sup>
  - b. The jury has only heard evidence from one family member, Brother 2. The questions asked of him related largely to events prior to Usman Khan's original prosecution. It was not suggested that he (or any other family member) knew of the intelligence about Usman Khan, his various risk assessments in prison, or the ongoing investigation into Usman Khan by various police forces and/or Mi5. It was not suggested that any act or omission on the part of the family led to the tragic loss of life in this case.

JUDE BUNTING  
Doughty Street Chambers

24<sup>th</sup> May 2021

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<sup>1</sup> Evidence of Witness A: transcript of 13<sup>th</sup> May 2021, p.109.

<sup>2</sup> Evidence of Ken Skelton: transcript of 5<sup>th</sup> May 2021, pp.36-7.