

# OPUS 2

## INTERNATIONAL

Inquests arising from the deaths in the Westminster Terror Attack of 22 March  
2017

Day 8

September 19, 2018

Opus 2 International - Official Court Reporters

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- 1 Wednesday, 19 September 2018 1 Carriage Gates, at all times when the gates were open?
- 2 (10.04 am) 2 A. That's correct, sir.
- 3 THE CHIEF CORONER: Good morning. 3 Q. You were shown the post instructions and yesterday you
- 4 MR HOUGH: Can PC Sanders be brought back into the witness 4 said that the January 2015 post instructions that we've
- 5 box, please. 5 seen, you had never seen prior to this incident?
- 6 THE CHIEF CORONER: Certainly. 6 A. That's correct, sir.
- 7 PC NICHOLAS SANDERS (Continued) 7 Q. And you gave similar evidence in relation to
- 8 A. Good morning, sir. 8 the December 2015 post instructions.
- 9 THE CHIEF CORONER: Good morning. As before, sit or stand, 9 A. That's correct, sir.
- 10 whichever you feel comfortable with. 10 Q. Can I ask, please, for the January 2015 post
- 11 A. Thank you, sir. Thank you. 11 instructions to be called up on the screen. That's
- 12 Examination by MR ADAMSON 12 {WS5103/9}. You will remember that we looked at this
- 13 MR ADAMSON: Good morning, PC Sanders, my name is 13 document yesterday?
- 14 Dominic Adamson and I ask questions on behalf of the 14 A. Yes, sir.
- 15 widow of PC Palmer. 15 Q. The sector 3 duties, and again, these are materials that
- 16 A. Good morning, sir. 16 we are now very familiar with, are set out on the second
- 17 Q. Mr Sanders, you gave evidence yesterday about the nature 17 page of that document, if we go to that {WS5103/10}, and
- 18 of your patrols in the New Palace Yard and you were 18 sector 3 is described as "Carriage Gate"; does that
- 19 taken to the diagram that we are all now very familiar 19 description accord with your understanding of what
- 20 with, which shows the blue area, the area of 20 sector 3 duties entailed?
- 21 New Palace Yard, shaded in blue. And it's right to say 21 A. No, sir.
- 22 that your evidence yesterday was to the effect that your 22 Q. Because your understanding is that Carriage Gate --
- 23 patrols covered the entirety of that area; is that fair? 23 sorry, sector 3 involved the entirety of
- 24 A. That's correct, sir. 24 New Palace Yard?
- 25 Q. And it's right to say, isn't it, that your patrols were 25 A. That's correct, sir.
- 1 3
- 1 of that nature throughout the time that you performed 1 Q. So you would agree that the description of sector 3, as
- 2 sector 3 duties in New Palace Yard? 2 far as your understanding of it, is misdescribed in this
- 3 A. That's correct, sir. 3 document?
- 4 Q. So there was really no difference between what you were 4 A. It's not as I believed it to be, sir.
- 5 doing when you first started there and what you were 5 Q. Then, and you were asked about this by Mr Hough
- 6 doing up to and including 22 March 2017? 6 yesterday, it says:
- 7 A. That's correct, sir. 7 "Officers are to work together, working within
- 8 Q. We saw some CCTV footage two days ago which plotted your 8 proximity of each other, but not specifically as
- 9 movements over the period of 108 minutes prior to the 9 a pair."
- 10 attack. 10 A. Correct.
- 11 A. That's right, sir. 11 Q. And you told Mr Hough that that was not something that
- 12 Q. And we know from that footage that you were within the 12 you did?
- 13 vicinity of the Carriage Gates for a 14-minute period 13 A. No, sir.
- 14 across that 108-minute period? 14 Q. When you were on duties, you were always acting as
- 15 A. Correct, sir, yes. 15 a pair?
- 16 Q. And is it right, therefore, to say that that was 16 A. Yes, sir.
- 17 a typical day for you in terms of where you would 17 Q. And so you would be effectively standing pretty much
- 18 patrol? 18 next to each other; is that right?
- 19 A. Yes, sir. 19 A. That's correct, sir.
- 20 Q. So there might be days where you spent a little bit more 20 Q. And you would walk around together?
- 21 time at the Carriage Gates, there might be days where 21 A. Yes, sir.
- 22 you spent less time at the Carriage Gates? 22 Q. You would be what everyone could see was a pair?
- 23 A. That's correct, sir, yes. 23 A. Yes, sir.
- 24 Q. But what we can be confident of is that you were not at 24 Q. And that was the way that you had performed your duties
- 25 the Carriage Gates, or in close proximity to the 25 from January 2015 onwards?
- 2 4

1 A. Yes, sir.  
 2 Q. So it would be very obvious to anyone of a senior rank  
 3 to you that you were not working as a pair? Sorry, that  
 4 you were working as a pair?  
 5 A. Very much so, sir, yes.  
 6 Q. Yes. Just as a matter of interest, what would you  
 7 understand not specifically working as a pair to mean?  
 8 A. I suppose any distance of — I don't know, it's open to  
 9 question, isn't it, five feet, ten feet maybe. I don't  
 10 know.  
 11 Q. That's the point I'm trying to get at, PC Sanders. Were  
 12 you given any guidance as to what not working  
 13 specifically as a pair entailed?  
 14 A. Well, I'd never seen those so there was no guidance  
 15 because I hadn't seen the — I'd never seen the post  
 16 notes.  
 17 Q. Yes. So if you were told not to work specifically as  
 18 a pair, you would presumably have asked somebody: well,  
 19 what am I supposed to do in order to execute that  
 20 function? Is that right?  
 21 A. I suppose so, sir, yes.  
 22 Q. Because it sounds to me from your answers that you're  
 23 not very clear about what not working as a pair entails?  
 24 A. As I say, it's open to interpretation, isn't it? Again,  
 25 to say to work as a pair, or close proximity as a pair,

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1 it's down to whoever is asking you to work under those  
 2 circumstances, how far apart they want you.  
 3 Q. Yes. So you're not told about the sort of proximity  
 4 that you're expected to be within of each other in order  
 5 to comply with that instruction?  
 6 A. No, sir.  
 7 Q. The second sentence is:  
 8 "Officers to be positioned in close proximity to the  
 9 gates when they are open, but not outside."  
 10 Now, you've already said that that is not something  
 11 that you did.  
 12 A. That's correct, sir.  
 13 Q. And so it follows, doesn't it, that so far as  
 14 the January 2015 post instructions were concerned, you  
 15 never implemented them?  
 16 A. We never worked to those post instructions, sir, no.  
 17 Q. Yes. So we are told in the form of a witness statement  
 18 from Commander Usher, that that's what you should have  
 19 been doing. You were not doing that, and so, therefore,  
 20 we can be sure that when you were on duty, the post  
 21 instructions that Commander Usher says ought to have  
 22 been followed were not?  
 23 A. Correct, sir.  
 24 Q. You work with different firearms officers on different  
 25 shifts, presumably?

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1 A. Yes, sir.  
 2 Q. Since January 2015 up to March 2017, how many AFOs do  
 3 you think you performed sector 3 duties with? Best  
 4 guess.  
 5 A. 50 to 100.  
 6 Q. 50 to 100?  
 7 A. Maybe.  
 8 Q. Different officers?  
 9 A. Yes, definitely, sir.  
 10 Q. Did any one of them say to you during the course of your  
 11 duties, "PC Sanders, we are not complying with our post  
 12 instructions"?  
 13 A. No, sir.  
 14 Q. So the long and short of it seems to be that every  
 15 officer that you worked with didn't comply with those  
 16 post instructions as well?  
 17 A. I can only comment with the officers that worked with me  
 18 at the time, with me.  
 19 Q. Yes.  
 20 A. Yes, that — yes, at the time we just did as we believed  
 21 was the correct patrol.  
 22 Q. Now, I appreciate it was a very rough estimate, 50 to  
 23 100, that's a large difference because there's a lot of  
 24 difference between 50 officers and 100 officers. Let's  
 25 take your lowest figure of 50. That means that 50

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1 officers seemingly did not follow the instructions that  
 2 Commander Usher says that they ought to have been  
 3 following?  
 4 A. Again, sir, I can't comment for other officers, I can  
 5 only comment for myself.  
 6 Q. Well, you can comment on them when they are working with  
 7 you?  
 8 A. Yes, sir. Whilst they're working with me, they're  
 9 carrying out the patrol as we knew it to be.  
 10 Q. Yes. Can we then go to the next — sorry, before we  
 11 leave that post instruction, we saw yesterday a chain of  
 12 emails which indicated that in January 2015, the threat  
 13 level had changed, and the result of that change in  
 14 threat level was that the way in which the post  
 15 instructions were framed changed as well. In other  
 16 words, there is a change in the threat and so we need to  
 17 change the nature of the patrols.  
 18 A. Okay, sir. I've not seen these emails, so ...  
 19 Q. I appreciate that. You didn't change the way in which  
 20 you carried out patrols before and after January 2015.  
 21 That's your evidence; correct?  
 22 A. Yes, sir, that's correct.  
 23 Q. And so it follows, doesn't it, that despite a change in  
 24 threat level, there was no change in the way that sector  
 25 3 duties were actually performed?

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1 A. No, sir. As I've mentioned to Mr Hough yesterday, the  
 2 sector has been the same since I've been on the command.  
 3 So for the best part of five years leading up to the day  
 4 of the event.  
 5 Q. There was a change to the post instructions  
 6 in December 2015. Could we call those up on screen?  
 7 {DC8032/1}.  
 8 THE CHIEF CORONER: And, again, I think the officer told us  
 9 he had not seen these.  
 10 MR ADAMSON: Indeed, officer, yesterday you said in answer  
 11 to Mr Hough that you hadn't seen these notes. Can we  
 12 turn, again, to the second page of that document  
 13 {DC8032/2}. Now, the wording of sector 3 is identical,  
 14 save that the final sentence has been expanded, and  
 15 says:  
 16 "... and should include a short patrol into  
 17 New Palace Yard towards the exit point of the  
 18 Cromwell Green search area."  
 19 Now, you weren't told that any patrols that you were  
 20 to perform ought to be -- around the yard -- ought to be  
 21 short in nature; is that right?  
 22 A. No, sir.  
 23 Q. And do you know whether "short patrol" means short in  
 24 distance or short in time, or short in both senses?  
 25 A. Again, it's open to interpretation, sir.

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1 Q. But you hadn't seen it, so you didn't have cause to  
 2 interpret it?  
 3 A. No, sir.  
 4 Q. But whether it was short in distance or short in time,  
 5 or both, it would be obvious to anyone who watched you  
 6 perform your patrol that you weren't doing that either?  
 7 A. Yes, sir.  
 8 Q. Can I ask for us to turn up page 5 of that document  
 9 {DC8032/5}, and in the large box, penultimate line:  
 10 "Supervision of this post is the responsibility of  
 11 the Duty Officer/Patrolling Sergeant. Recorded periodic  
 12 checks are to be carried out to ensure compliance with  
 13 these instructions."  
 14 So is it right that you would see sergeants and  
 15 inspectors, or other ranks of officer, coming round to  
 16 see what you were doing?  
 17 A. Yes, sir.  
 18 Q. And how often would that happen? Was that daily,  
 19 weekly, monthly, yearly?  
 20 A. Daily -- a daily basis, sir.  
 21 Q. A daily basis. So it would be impossible over  
 22 a prolonged period of time for a person carrying out  
 23 those duties not to appreciate that you were not  
 24 performing your patrols in accordance with the post  
 25 instructions unless they themselves were unaware of the

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1 post instructions?  
 2 A. As I say, I can't answer for other people, but on your  
 3 first point, yes, that's correct.  
 4 Q. Yes. So if you are wandering around, saying: well, is  
 5 PC Sanders doing what he ought to be doing? Well, let's  
 6 go and have a look at sector 3, he's down by the  
 7 colonnades and they've seen him down there for 46  
 8 minutes, he's definitely not doing what he ought to be  
 9 doing as per the post instructions. That would have  
 10 been obvious to a person carrying out such a check?  
 11 A. If they were using those post notes as their guidance  
 12 for the patrol, yes, sir.  
 13 Q. But your evidence is that that's not what everyone was  
 14 using; you were all looking at the plan in the base  
 15 room?  
 16 A. That's correct, sir.  
 17 Q. Which is headed up "Sector 3"?  
 18 A. That's correct, sir.  
 19 Q. And presumably, when you went into work of a morning,  
 20 you would be told: PC Ashby you are on sector 3 duties?  
 21 A. Yes, sir.  
 22 Q. And you would know what sector 3 duties involved?  
 23 A. Yes, sir.  
 24 Q. Because it's on the plan?  
 25 A. Correct, sir.

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1 Q. Where do you get your daily duties? Where do you get  
 2 issued with your daily responsibilities?  
 3 A. The duties are printed off and they're put into the duty  
 4 binder, which is a large binder. I don't know whether  
 5 you've got a -- you've seen the base room?  
 6 Q. I've not personally seen it. I've seen photographs of  
 7 a wall in the base room.  
 8 A. Okay, it's a very small room, about 5 feet wide by  
 9 6 foot in length, a very small room, and you would look  
 10 at your duty sheet for the day and it would tell you  
 11 what your postings are from sectors 1 to 5, or  
 12 St Stephen's or the peers' entrance.  
 13 Then to the right of you is the maps. So you would  
 14 look at where you are and if you didn't know your way  
 15 around the estate, the maps would literally be to your  
 16 right-hand side for you to -- for reference.  
 17 Q. And is it right that there's a permanent team who were  
 18 based at the location?  
 19 A. That's correct, sir.  
 20 Q. But you occasionally get support from outside?  
 21 A. Very much so, quite often, yes.  
 22 Q. Yes. So somebody coming in to the team perhaps for  
 23 a day --  
 24 A. Guests, as we called them, sir.  
 25 Q. Guests. Guest AFOs. They would be on the duty roster,

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1 would they?  
 2 A. Yes, it would normally be overtime to cover infractions,  
 3 so if it was someone new to the command then the sector  
 4 patrol would be explained to them. So — you know,  
 5 because it's a large estate anyway without then having  
 6 to take in what your sector patrol is. So obviously it  
 7 would be explained to them like it was to me when  
 8 I first went down there.  
 9 Q. And — sorry?  
 10 A. Yes, so it would be explained to you where you ought to  
 11 patrol within your sector area.  
 12 Q. And would the map on the wall be used as the means by  
 13 which to explain the patrol?  
 14 A. Yes, sir, without a doubt.  
 15 Q. You were shown yesterday a document which had been  
 16 produced as part of a misconduct process which had  
 17 resulted in no action being taken against you. Within  
 18 that misconduct assessment document, it's suggested that  
 19 you, along with PC Ashby, had adopted a misguided  
 20 misinterpretation of what your duties entailed. Do you  
 21 accept that criticism?  
 22 A. Obviously I couldn't misinterpret something I'd never  
 23 seen. So I don't know. I mean, I've never read that  
 24 report, I've never seen it, so it's difficult for me to  
 25 comment.

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1 Q. The report also suggested that your apparently misguided  
 2 interpretation of what your duties entailed was  
 3 a misguided interpretation which many others in the  
 4 command had adopted.  
 5 A. Again, sir, I can't speak for others, but I can't —  
 6 I can't see how I can misinterpret something I've never  
 7 seen.  
 8 Q. Yes. But that conclusion is consistent, isn't it, with  
 9 what you say about the fact that what you were doing was  
 10 exactly the same as what everyone else was doing?  
 11 A. Yes, during my time there, sir, yes.  
 12 Q. Had you ever been told that the gates represented  
 13 a specific and particular vulnerability in the  
 14 New Palace Yard?  
 15 A. By whom, sir?  
 16 Q. By anyone?  
 17 A. No, sir.  
 18 Q. And it's right, isn't it, that if you as a trained,  
 19 experienced authorised firearms officer are told that  
 20 a particular location represents a particular  
 21 vulnerability, that will affect the way you go about any  
 22 patrol that you carry out?  
 23 A. It would certainly be high up on your considerations,  
 24 yes, sir.  
 25 Q. Yes. And so if you are not told that, it's not high up

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1 on your considerations, and therefore that is going to  
 2 leave that particular vulnerability more exposed than it  
 3 ought to be; do you agree?  
 4 A. Yes, sir.  
 5 Q. We've heard from others about the ability to provide  
 6 effective support to unarmed officers at the gates of  
 7 New Palace Yard from the colonnade area. I want to give  
 8 you an opportunity to comment upon it. Do you agree  
 9 that if you are in the area of the colonnade, you are  
 10 not in a position to provide any effective support to  
 11 unarmed officers at the gates?  
 12 A. Yes, I would agree with that comment, sir, yes.  
 13 Q. You said yesterday that you were aware that there had  
 14 been a time when there had been a fixed post for AFOs at  
 15 the gates, but that was not a duty that you yourself had  
 16 performed?  
 17 A. No, sir.  
 18 Q. Does it follow from your last answer that the move from  
 19 a fixed post system to a roving patrol inevitably meant  
 20 that those at the gates were made more vulnerable?  
 21 A. It was definitely more difficult to respond to anywhere  
 22 within that sector with the resources we had available  
 23 to us at the time, sir.  
 24 Q. Right. So are you saying that, in effect, you could not  
 25 effectively protect that area when it was just you and

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1 one other officer?  
 2 A. What I'm saying is that because of the way that we  
 3 patrolled is we could have been anywhere, any time on  
 4 that sector, and had to have responded to a number of  
 5 locations. So it's been — it's all a case of whether  
 6 anything happened within that sector, being in the right  
 7 place at the right time. But obviously the main thing  
 8 for us was — is that we were within that area to  
 9 respond to anywhere within it.  
 10 Q. So really it comes down to this, doesn't it: there's  
 11 only effective protection for unarmed officers at the  
 12 gates if, as luck would have it, you happened to be in  
 13 the vicinity when an attack occurs?  
 14 A. If we were in the vicinity, if and when an attack would  
 15 have occurred, all that would have meant that they would  
 16 have had armed capabilities near them —  
 17 Q. Yes.  
 18 A. — quicker than if we were further away.  
 19 Q. And you would agree, wouldn't you, that if armed  
 20 officers are in close proximity to the gates at the time  
 21 of an attack, they then have an opportunity to assist  
 22 unarmed officers?  
 23 A. Yes, sir.  
 24 Q. If they're not there, they don't?  
 25 A. Yes, sir.

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1 Q. And so we can therefore conclude confidently that the  
2 system that was in place when it shifted from a fixed  
3 patrol to a mobile patrol, left officers at the gates  
4 materially more vulnerable as a result of that change?  
5 A. Along with all the other places of threat on that sector  
6 as well, sir, yes.  
7 MR ADAMSON: Thank you very much, PC Ashby, I know that  
8 there will be further questions on some different  
9 topics.  
10 A. Sanders.  
11 MR ADAMSON: I do apologise, PC Sanders.  
12 Examination by MS STEVENS  
13 MS STEVENS: Police Constable Sanders, my name is  
14 Susannah Stevens and I'm going to ask you some  
15 questions, if I may, on behalf of the parents of  
16 Police Constable Palmer and his siblings.  
17 A. Good morning, madam.  
18 Q. Good morning. Can we just deal with what you've told us  
19 about the system. It goes further than the fact that  
20 you were told by others that that was the system in  
21 place. You weren't told by anybody, were you, that  
22 there was a different system in place and recorded on  
23 the ADAM system, were you?  
24 A. I wasn't aware of that, ma'am, no.  
25 Q. If anybody had told you that there were different

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1 instructions on the ADAM system, you would have looked  
2 at it, wouldn't you?  
3 A. Yes, ma'am.  
4 Q. If anyone told you that the ADAM system gave you the  
5 instructions rather than what you were being told in  
6 person by your supervisors, you would have looked at it,  
7 wouldn't you?  
8 A. Correct, ma'am.  
9 Q. Now, whatever was said on the piece of paper called the  
10 post note, it didn't represent the reality of the  
11 security system in place in sector 3, did it?  
12 A. No, ma'am.  
13 Q. And if the system that was represented by the post  
14 instruction was the correct system, it was being ignored  
15 at supervisor level too, wasn't it?  
16 A. I can't comment, ma'am.  
17 Q. Well, you can, because of course you have the experience  
18 of what your supervisors were doing, don't you?  
19 A. I do, ma'am, in respect of the way we carried out our  
20 duties and the way we were supervised, but obviously  
21 I can't comment on what the sergeants themselves  
22 believed to be -- well, whether they'd seen the post  
23 notes or not.  
24 Q. No, but what you can help with is the fact that not  
25 a single supervisor who gave you instructions gave you

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1 instructions in line with that post note, did they?  
2 A. No, ma'am, no.  
3 Q. Not a single supervisor who carried out the checks on  
4 you spoke to you in line with that post note, did they?  
5 A. No, ma'am, not specifically, no.  
6 Q. Not specifically or, indeed, in general terms?  
7 A. If what you mean is were we ever challenged because  
8 officers weren't near the gate, then not to my  
9 knowledge, no.  
10 Q. Can we deal with the fact that you've made a number of  
11 statements to assist with the Inquest, haven't you?  
12 A. Yes, ma'am.  
13 Q. You made a statement on 18 May 2017, didn't you?  
14 A. Yes, ma'am.  
15 Q. A statement on 1 June 2017; yes?  
16 A. Correct, ma'am.  
17 Q. And in that statement you made it clear that sector 3  
18 was a patrol of New Palace Yard, didn't you?  
19 A. Yes, ma'am.  
20 Q. You then gave a statement on 15 June of this year where  
21 you gave a lot of detail about why it was that the  
22 sector 3 security system covered New Palace Yard, didn't  
23 you?  
24 A. Yes, ma'am.  
25 Q. You also then provided the maps that were on the wall,

19

1 didn't you?  
2 A. Yes, ma'am.  
3 Q. Back in June of this year. You then provided a further  
4 statement on 25 August, didn't you?  
5 A. Yes, ma'am.  
6 Q. That gave yet more detail as to why it was that you were  
7 saying that sector 3 covered the whole of  
8 New Palace Yard?  
9 A. Yes, ma'am.  
10 Q. When you made those statements, did you make the  
11 statements alone, by yourself, or did you make the  
12 statement in the company of other officers or a lawyer?  
13 A. The first one was on my own. I think the subsequent  
14 statements were made or taken by officers from SO15.  
15 Q. Have you then at any point had meetings with lawyers for  
16 the Metropolitan Police Service?  
17 A. Yes, ma'am.  
18 Q. When you said, then, that sector 3 was the whole of  
19 New Palace Yard and that's what you had been doing,  
20 patrolling that area for years, was that challenged by  
21 anybody within the Metropolitan Police Service team?  
22 A. I think, to give a timeline of events here, in relation  
23 to this, is that post the attack when I was first  
24 contacted to be asked to make a statement, I then made  
25 subsequent statements this year. I was informed of the

20

1 misconduct investigation round January time, and then  
 2 I then spoke to legal services around July, I believe.  
 3 Q. All right. Now, in terms of the misconduct  
 4 investigation that you have referred to, you were told  
 5 about it, but you weren't given an opportunity to engage  
 6 in it in terms of giving your version of events, were  
 7 you?  
 8 A. No, ma'am.  
 9 Q. No. Nobody from the Department of Professional  
 10 Standards within the Metropolitan Police Service ever  
 11 spoke to you to ask you why you were in the colonnades,  
 12 did they?  
 13 A. No, ma'am, I was never informed that I was under  
 14 investigation, only of the outcome of it.  
 15 Q. Has anybody within the Metropolitan Police Service asked  
 16 you for the names of the other authorised firearms  
 17 officers who were doing exactly the same thing as you?  
 18 A. No, ma'am.  
 19 Q. If anybody suggested to you, within the Metropolitan  
 20 Police Service: this is your individual fault, officer,  
 21 for not looking on the ADAM system, would you have been  
 22 happy to have given that person the details of all those  
 23 other AFOs who were doing exactly the same thing?  
 24 A. I don't think I would have had a choice, ma'am. If  
 25 I'm asked for names of officers, then I would give them.

21

1 Who would be asking these questions?  
 2 Q. I'm just asking you if anybody had asked you, would you  
 3 have been happy to give those details?  
 4 A. I don't know whether it would be my place to give them,  
 5 ma'am. I don't know in what context you are asking the  
 6 question.  
 7 Q. In any event, it would be -- there are records, aren't  
 8 there, within the Metropolitan Police Service, of AFOs  
 9 who were on duty?  
 10 A. Yes, ma'am.  
 11 Q. So it would be easy for anyone within the Metropolitan  
 12 Police Service to get that information for themselves,  
 13 wouldn't it?  
 14 A. I would imagine so, ma'am. I'm not privy to those  
 15 systems but I would imagine they exist in some form.  
 16 Q. You've told us that you were given the information about  
 17 the patrol and the patrol map by your supervisors,  
 18 haven't you?  
 19 A. It would have been explained to me on one of my first --  
 20 it would have been explained to me on one of my first  
 21 duties at the Palace.  
 22 Q. Has anybody asked you for the details of who it was that  
 23 gave you that instruction?  
 24 A. No, ma'am.  
 25 Q. In your last statement, you did provide information

22

1 about a briefing that you received on 20 February of  
 2 last year, didn't you?  
 3 A. Yes, ma'am.  
 4 Q. That briefing supported and reconfirmed to you the  
 5 security system that was in place was that the two AFOs  
 6 on duty in sector 3 should cover all of New Palace Yard;  
 7 that's right, isn't it?  
 8 A. Yes, ma'am.  
 9 Q. You gave details that the briefing given to you was  
 10 written by Superintendent Simon Causer; is that right?  
 11 A. Yes, ma'am.  
 12 Q. The email was distributed by Police Sergeant McDowell;  
 13 is that correct?  
 14 A. That's correct, ma'am.  
 15 Q. Then the following week, so after it's sent to you in  
 16 writing, the following week, you had parade briefing by  
 17 Superintendent Causer and Superintendent Amanda Dellar;  
 18 is that correct?  
 19 A. That's correct, ma'am.  
 20 Q. Now, that briefing came accompanied by another map,  
 21 didn't it?  
 22 A. There were a number of different maps representing  
 23 different days of the week.  
 24 Q. Yes.  
 25 A. And also deployments of armed response vehicles as well.

23

1 Q. Could we just bring up the map that you were given,  
 2 please, and it's WS1237C/ -- and I am afraid it's cut  
 3 off in my version.  
 4 THE CHIEF CORONER: 3, I think is the number.  
 5 MS STEVENS: 3, thank you, sir. Could we just bring that  
 6 up, please {WS1237C/3}.  
 7 THE CHIEF CORONER: I think it's C/3 rather than B/3.  
 8 MS STEVENS: Sorry, did I say B?  
 9 THE CHIEF CORONER: No, but B appeared on the screen.  
 10 MS STEVENS: Ah. Thank you. Thank you very much.  
 11 Can you see anything that would suggest that this is  
 12 an alarm map?  
 13 A. No, ma'am, I think you might be referring to the other  
 14 map.  
 15 Q. Yes, I'm going to come on to that in a moment, if I may,  
 16 but there is certainly nothing that would suggest that  
 17 this is an alarm map?  
 18 A. No, ma'am, this shows, obviously if it was in colour,  
 19 sector 3 is highlighted in red, and obviously it shows  
 20 you a static post within the estate, which is clearly  
 21 marked in brackets as static.  
 22 Q. As far as you're concerned, then, this map shows the  
 23 patrol area for sector 3.  
 24 A. Yes, ma'am.  
 25 Q. Nothing to do with alarms?

24

1 A. No, ma'am.  
 2 Q. If we could have a look, then, please, at {WS1633/5}.  
 3 Thank you very much, I'm very grateful to my learned  
 4 friend: could we bring up the unredacted version of  
 5 that, please.  
 6 Whilst we are waiting for that, I can just ask you  
 7 this: the area shaded in blue, what did you understand  
 8 that to show?  
 9 A. My area of responsibility whilst on the sector, ma'am.  
 10 Q. Ah, thank you very much, we now have the unredacted  
 11 version. So we can see at the bottom of that that there  
 12 are alarm locations, can't we?  
 13 A. Yes, ma'am.  
 14 Q. The alarm locations, then, are shown in red, are they?  
 15 A. Correct, ma'am.  
 16 Q. But the blue shaded area, the significance of the  
 17 shading is that that is the area of patrol?  
 18 A. Correct, ma'am.  
 19 Q. That's not to do with alarms?  
 20 A. No, ma'am.  
 21 Q. Was there a -- if this was an alarm map, that's  
 22 suggested to you and that's what the blue shading in  
 23 some way shows, was there any other patrol map on the  
 24 wall in the base room during the time that you were  
 25 working there?

25

1 THE CHIEF CORONER: For sector 3?  
 2 MS STEVENS: For sector 3, exactly.  
 3 A. No, ma'am. Are you saying that the blue shaded area  
 4 represents an alarm?  
 5 Q. No. I'm certainly not, and that's why I asked you what  
 6 it means to you. But if it is suggested that this is  
 7 actually an alarm map, what I'm asking you is, was there  
 8 any other map within the base room that showed sector 3?  
 9 A. No, ma'am.  
 10 Q. No. So there was no map within the base room which had  
 11 an area of shading just showing Carriage Gates towards  
 12 the Cromwell Green exit?  
 13 A. No, ma'am.  
 14 Q. If there had been, there would have been an obvious  
 15 basis for you AFOs to say: wait a moment, we've got two  
 16 maps showing two completely different things. That's  
 17 right, isn't it?  
 18 A. You would like to think it would have been highlighted,  
 19 yes, ma'am.  
 20 Q. Yes. We know, moving on to a different topic, we know  
 21 that you were in the colonnades on the day in question  
 22 for some time. You were never told by anybody, were  
 23 you, in your briefings, that there was a maximum period  
 24 of time that you could be at any location?  
 25 A. No, ma'am.

26

1 Q. You were never told during your training that there was  
 2 a maximum period of time that you could be at any  
 3 location, were you?  
 4 A. No, ma'am.  
 5 Q. Has anybody queried with you why you were in the  
 6 colonnades for that period of time before yesterday?  
 7 A. No, ma'am.  
 8 Q. So when you were giving your statements with the senior  
 9 officers, nobody asked you about timing?  
 10 A. No, ma'am.  
 11 Q. No misconduct investigation into the question of timing;  
 12 that's right, isn't it?  
 13 A. Yes. Like I've mentioned, ma'am, I was never informed  
 14 that I was under investigation, so I never had the  
 15 opportunity to take part in that.  
 16 Q. You saw the Acting Commissioner When you were in the  
 17 area of the colonnade?  
 18 A. That's correct, ma'am.  
 19 Q. Did he say anything to you about the fact that actually  
 20 you should be getting back to Carriage Gates?  
 21 A. No, ma'am.  
 22 Q. You've told us that the reason that you can think of for  
 23 why you were in colonnades for that period of time was  
 24 to protect the cabinet ministers and the high profile  
 25 MPs; is that right?

27

1 A. Yes, ma'am.  
 2 Q. They are people who obviously need protecting, aren't  
 3 they?  
 4 A. Yes, ma'am.  
 5 Q. You were aware of that particular need, weren't you?  
 6 A. At that particular time, ma'am.  
 7 Q. What you weren't aware of was the particular need to  
 8 protect the unarmed police officers at Carriage Gates;  
 9 that's right, isn't it?  
 10 A. As I say, there's a need to protect everyone on the  
 11 estate, ma'am, including the other areas that we were  
 12 responsible for within that area.  
 13 Q. Yes, but nobody said to you: those unarmed police  
 14 officers at Carriage Gates, they are in particular need  
 15 of your protection because they are highly vulnerable.  
 16 Nobody said that to you, did they?  
 17 A. No, ma'am.  
 18 Q. So it's not just that the location of Carriage Gates was  
 19 not highlighted to you as being a location of  
 20 vulnerability; the unarmed officers were not highlighted  
 21 to you as being people of particular vulnerability;  
 22 that's right, isn't it?  
 23 A. Yes, ma'am.  
 24 Q. If anybody had said to you: you need to prioritise and  
 25 look after the cabinet ministers and the MPs, and you

28

1 need to prioritise and look after your unarmed  
 2 colleagues at Carriage Gates, you would have said,  
 3 wouldn't you: well, I'm sorry, but I can't do both.  
 4 A. You can't be in four places at once --  
 5 Q. No.  
 6 A. -- yes, ma'am.  
 7 Q. You said yesterday that being an AFO in this area, that  
 8 it did give you concern that part of the patrols you  
 9 couldn't see; do you remember saying that yesterday?  
 10 A. There are blind spots all over that yard due to just the  
 11 make up of it.  
 12 Q. Yes, but do you remember saying that that gave you  
 13 concern?  
 14 A. If I said that, ma'am, yes.  
 15 Q. Did you ever raise those concerns with anybody, or hear  
 16 any other AFO doing that?  
 17 A. No, ma'am, because if I was in a location where  
 18 I couldn't see a particular area, then I just moved to  
 19 another one.  
 20 Q. Sorry, if you were in a location that you couldn't see  
 21 a particular area, you would move to another one?  
 22 A. Yes, you'd just be constantly moving from one area to  
 23 the other, as and when you saw fit to do so.  
 24 Q. Right. But the question of whether or not you see fit  
 25 to move to another area is going to depend on whether or

29

1 not you know what's going on in another area, isn't it?  
 2 A. Well yes, I suppose so, yes.  
 3 Q. Yes. So if we look at the awful events of 22 March last  
 4 year, you didn't even know that your unarmed colleague  
 5 was being stabbed to death, did you?  
 6 A. Not at the time, ma'am, no.  
 7 Q. No, not at the time, until it's too late; that's right,  
 8 isn't it?  
 9 A. That's correct, ma'am.  
 10 Q. So it's not just the fact that you're unable to respond  
 11 immediately to a threat: you don't even know when the  
 12 threat exists, do you, if you can't see it?  
 13 A. Well, I would say, ma'am, that on the day we did  
 14 immediately react to a threat at the perimeter fence.  
 15 Q. No, we're dealing with the stabbing of Police Constable  
 16 Palmer. You couldn't deal with that immediately, could  
 17 you, if you couldn't see it happening?  
 18 A. No, because we were dealing with the car into the fence.  
 19 Q. Well, also because you didn't know about it; that's  
 20 true, isn't it?  
 21 A. Well, with the sequence of events, that -- there was  
 22 just no way that we would have known about that.  
 23 Q. Sorry?  
 24 A. With the sequence of events and the way they unfolded,  
 25 and from the position where we were, there was just no

30

1 way that we were going to know that.  
 2 Q. No. In terms of your training, you are trained, aren't  
 3 you, to constantly make and undertake a dynamic risk  
 4 assessment, aren't you?  
 5 A. That's correct, ma'am.  
 6 Q. In terms of that dynamic risk assessment, you are  
 7 trained to take into account all relevant  
 8 considerations, aren't you?  
 9 A. Yes, ma'am.  
 10 Q. That's in terms of assessing the risk, but it also  
 11 involves how to most effectively deal with that risk.  
 12 Is that right?  
 13 A. That's correct, ma'am.  
 14 Q. You are also trained about the need for an immediate  
 15 response, aren't you?  
 16 A. Yes, ma'am.  
 17 Q. Well, you paused. If we could bring up the post  
 18 instruction, please, and I know you say you haven't seen  
 19 this, but I just wanted to see if this corresponds with  
 20 your training. So {DC8032/1}, please. If you have  
 21 a look at bullet point 1, how to achieve your primary  
 22 role and responsibility as a firearms officer to protect  
 23 the people contained within the estate, it's to be  
 24 achieved by:  
 25 "Immediately containing or confronting a deadly

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1 threat."  
 2 Do you see that?  
 3 A. Yes, ma'am.  
 4 Q. That's your training, isn't it? You've got to deal with  
 5 it immediately?  
 6 A. That ultimately is what the AFOs are there to do, yes,  
 7 ma'am.  
 8 Q. Yes, so not a quick response or a rapid response; your  
 9 training teaches you to have an immediate response?  
 10 A. To contain and confront the deadly threat.  
 11 Q. You are therefore trained to deal and eradicate a threat  
 12 within fractions of a second, aren't you?  
 13 A. That all depends on individual circumstances, ma'am.  
 14 Q. Yes, but you're trained to deal with it certainly within  
 15 a second, aren't you? That's what you have practised in  
 16 your exercise?  
 17 A. We are trained to discharge our firearms within the law,  
 18 ma'am.  
 19 Q. Do you not have practical exercises where you practice  
 20 firing?  
 21 A. Yes, ma'am.  
 22 Q. And when you practise firing and discharging your  
 23 weapon, you are practising two things, aren't you? One  
 24 to do it immediately. That's one of the things you  
 25 practise, isn't it?

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1 A. I don't see where you're going with this. It's ...  
 2 I don't understand.  
 3 Q. All right. Don't worry where I'm going. If you focus  
 4 on the question, it's about your training --  
 5 A. Right, okay.  
 6 Q. -- and the practical exercises. One of the things that  
 7 you are practising again and again is to make sure  
 8 you're able to take a shot extremely quickly. That's  
 9 right, isn't it?  
 10 A. To deal with spontaneous incidents, yes. Yes.  
 11 Q. Yes, to take a shot quickly?  
 12 A. Yes, that's correct, ma'am.  
 13 Q. So haven't you, as part of your training to even get to  
 14 be an authorised firearms officer, let alone one for  
 15 years, you will have spent time, won't you, again and  
 16 again discharging that weapon?  
 17 A. Correct, ma'am.  
 18 Q. To ensure that you can do so within a second; that's  
 19 right, isn't it?  
 20 A. Well, within whatever time frame that's needed, yes.  
 21 Q. Well, if the time frame is a second, that's what you're  
 22 trained to do, isn't it?  
 23 A. Correct. Yes, ma'am.  
 24 Q. The other thing you are trained to do is to get  
 25 an effective shot in, aren't you?

33

1 A. Correct, ma'am.  
 2 Q. So not only do you practice doing it within that second,  
 3 you practice target shooting, don't you?  
 4 A. That's correct, ma'am.  
 5 Q. You're not going to pass your firearms training if you  
 6 are a bad shot, are you?  
 7 A. That's correct, ma'am.  
 8 Q. As an authorised firearms officer of some years'  
 9 standing, you are a very effective shot-taker, aren't  
 10 you?  
 11 A. I'd like to think so, ma'am.  
 12 Q. You, in terms of your training, are trained that if  
 13 there is any sign of a threat, that you need to be in  
 14 position to deal with it immediately. That's what you  
 15 are trained, aren't you?  
 16 A. Correct, ma'am.  
 17 THE CHIEF CORONER: You say "any threat"?  
 18 MS STEVENS: Any sign of a threat that is going to  
 19 potentially require you to use --  
 20 A. Justify using the weapon.  
 21 Q. -- your firearm, exactly. You are trained to be highly  
 22 alert to the signs of a potential threat, aren't you?  
 23 A. Yes, ma'am.  
 24 Q. In terms of the signs of a threat on that day, the only  
 25 one that you were aware of in your position -- well, in

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1 fact, to be accurate you were aware of two -- you were  
 2 aware of the sound of an explosion; is that right?  
 3 A. Correct, ma'am.  
 4 Q. You were then aware of the sound of somebody in pain.  
 5 A. Correct, ma'am.  
 6 Q. In terms of relevant factors that you will take into  
 7 account when assessing the threat and the level of  
 8 threat, it would be relevant, wouldn't it, if you could  
 9 see 50 to 100 people running past carriage gates; that  
 10 would be relevant, wouldn't it?  
 11 A. Are you asking whether I saw that or just whether it  
 12 would be relevant?  
 13 Q. No, I'm asking you as an experienced authorised firearms  
 14 officer --  
 15 A. Yes.  
 16 Q. -- whether that would be a factor that you would take  
 17 into account, that you can see 50 to 100 people running  
 18 past Carriage Gates?  
 19 A. Yes.  
 20 Q. Would it be a relevant consideration that they're all  
 21 going in the same direction and therefore the threat  
 22 seems to be coming from behind them; would that be  
 23 relevant?  
 24 A. That would be relevant, ma'am, yes.  
 25 Q. Would it be relevant that they're not just shouting in

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1 pain; this wave of people running away from something  
 2 coming in that direction, they are screaming in fear?  
 3 Would that be relevant?  
 4 A. Yes, it would all be relevant information for you to  
 5 make a threat assessment.  
 6 Q. Yes. It would be highly relevant, wouldn't it?  
 7 A. I would suggest so, ma'am.  
 8 Q. If you were at Carriage Gates and you saw and heard  
 9 that, you would have your firearm raised and ready,  
 10 wouldn't you?  
 11 A. Are we talking in context of the day or ... because,  
 12 obviously you had the vehicle hitting the wall first.  
 13 Q. I'm asking you about the factors I've put to you.  
 14 A. Mm-hm.  
 15 Q. If you are at Carriage Gates and you see 50 to 100  
 16 people running away from something in the same  
 17 direction --  
 18 A. Yes.  
 19 Q. -- screaming with fear, you would raise your firearm and  
 20 have it ready, wouldn't you?  
 21 A. Yes, I would certainly have it ready and be highly  
 22 alert, yes, ma'am.  
 23 Q. Yes. Not only would it be raised, you would ensure that  
 24 it was ready to fire, wouldn't you?  
 25 A. The -- our weapons are always ready to fire, ma'am.

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1 Q. Right. Don't you have to just quickly remove something  
2 out of the way?  
3 A. The safety catch, yes.  
4 Q. Exactly. So you would remove the safety catch, wouldn't  
5 you?  
6 If one of those people was indicating with their  
7 thumb behind them, that would be something that you  
8 would take into account as well, wouldn't it?  
9 A. Yes, ma'am, yes.  
10 Q. Yes. It's an indicator, isn't it, by a member of the  
11 public to you, the police, that there's something or  
12 someone behind?  
13 A. Yes, ma'am.  
14 Q. That's right. If you were told that there is somebody  
15 stabbing people with knives, you would be on the highest  
16 of alert, wouldn't you?  
17 A. Without doubt, ma'am.  
18 Q. Without a doubt. You would be absolutely ready, if  
19 necessary, to fire, wouldn't you?  
20 A. Yes, ma'am.  
21 Q. Your training is such that you don't wait until the  
22 moment that somebody is in front of you with a knife or  
23 a firearm before you get ready --  
24 A. No, ma'am.  
25 Q. -- do you?

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1 A. No.  
2 Q. No. And so you have said that absolutely that's what  
3 you would do.  
4 Now, you, of course, weren't able to do any of those  
5 things because you were in the colonnades; that's right,  
6 isn't it?  
7 MR KEITH: That is not what the witness said. The witness  
8 said just a few moments ago that he reacted to the  
9 threat presented of the car crashing into the wall.  
10 That was an inaccurate assertion to put.  
11 MS STEVENS: You were in the area of the colonnades, you  
12 were walking away from it. Let's put it another way if  
13 that causes difficulty.  
14 MR KEITH: It doesn't cause difficulty, it was wrong.  
15 MS STEVENS: Right. How far away were you from the area of  
16 the colonnades?  
17 A. At the time where the vehicle hit the perimeter fence?  
18 Q. Yes.  
19 A. A few feet away from the colonnades.  
20 Q. A few feet away, all right, so I'll rephrase it. At the  
21 time that you have said if you had been at  
22 Carriage Gates you would have been on high alert with  
23 your firearm ready to use, you were unable to do that  
24 because you were a few feet away from the colonnades; is  
25 that right?

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1 A. But I also mentioned that if I was at Carriage Gates and  
2 that vehicle had hit the perimeter fence, then I would  
3 have still been drawn to that vehicle, ma'am.  
4 THE CHIEF CORONER: That's what I noted yesterday. He said  
5 that his attention was drawn to a loud noise on  
6 Bridge Street, the sound of an explosion. So that was  
7 where his attention was.  
8 MS STEVENS: Yes. If you had been at Carriage Gates there  
9 would be -- you have just accepted -- there would be  
10 evidence of a clear threat, wouldn't there; yes?  
11 A. As there was with the vehicle hitting the perimeter  
12 fence, ma'am.  
13 Q. Don't worry about that at the moment, I'm just asking  
14 you about Carriage Gates. If you were at  
15 Carriage Gates, there would be clear evidence of  
16 a threat, wouldn't there?  
17 THE CHIEF CORONER: Can I just be clear, Ms Stevens, because  
18 the proposition you put to him is that if he was at  
19 Carriage Gates and people were running in one direction  
20 indicating the threat was behind them and somebody with  
21 their thumb pointing behind, that proposition doesn't  
22 involve what the officer actually heard, which was the  
23 noise of the crash. Is that part of the proposition  
24 you're putting to him, or is it simply that these people  
25 were running in one direction?

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1 MS STEVENS: It's certainly part of the factual matrix, with  
2 the other matters that I've put, of course, sir, that  
3 they're screaming with fear and the stabbing with  
4 knives.  
5 THE CHIEF CORONER: Because it seemed to me of those the  
6 first thing the officer said he responded to was the  
7 sound of the car, we now know hitting the wall, but the  
8 sound of what he thought at the time was an explosion.  
9 MS STEVENS: Yes, of course. What I'm dealing with, though,  
10 is not what he was aware of --  
11 THE CHIEF CORONER: That's what I'm trying to be clear as to  
12 what proposition you're putting to him, because at the  
13 moment it's not clear to me, and it may not be to the  
14 officer, as to what it is that's in your proposition  
15 that you are asking him to respond to. Because they are  
16 quite different.  
17 MS STEVENS: They are, absolutely. I will make it  
18 abundantly plain.  
19 Officer, do you remember all the different factors  
20 that I put to you that led you to say that if you had  
21 been aware of all of those considerations and you had  
22 been at Carriage Gates, you would have certainly had  
23 your firearm raised, ready to use; do you remember that?  
24 A. Yes.  
25 Q. Right.

40

1 A. And I gave that answer on the basis of what you were  
 2 talking about was the information available was just  
 3 that, not actually what happened on the day.  
 4 Q. All right. Now, in terms of that situation, you had no  
 5 idea, did you, what was going on in terms of the sound  
 6 of the explosion or the collision?  
 7 A. Correct.  
 8 Q. So that was an unknown quantity, wasn't it?  
 9 A. An unknown threat, ma'am, yes.  
 10 Q. An unknown threat, exactly. More than it just being  
 11 an unknown threat, there's also the unknown aspect that  
 12 you don't know if you, with your firearms, are going to  
 13 be able to help, do you?  
 14 A. No, ma'am, not until we go and investigate what's  
 15 actually happening.  
 16 Q. Exactly. Because it's perfectly foreseeable, isn't it,  
 17 that there could be an explosion and you having  
 18 a firearm is not going to help with that. That's right,  
 19 isn't it?  
 20 A. Well, again, that's -- it could be -- it could have been  
 21 part of something bigger of what we -- you know, what we  
 22 believed at the time was the start of an attack on the  
 23 Palace.  
 24 Q. It could have been, but if you could just answer the  
 25 question, please: in terms of your training and

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1 experience, it is perfectly possible, isn't it, for  
 2 there to be an explosion that your firearm is not going  
 3 to help with? If an explosion happened and it's simply  
 4 one explosion, your firearm is not going to help, is it?  
 5 A. Well, again, you won't know until you get there and  
 6 assess the situation, ma'am.  
 7 Q. Exactly. You don't know if you can help or not in terms  
 8 of that situation, do you?  
 9 A. No, ma'am.  
 10 Q. No.  
 11 THE CHIEF CORONER: So his firearm might help. It might  
 12 depend what the explosion is. If it's a gas explosion  
 13 or if it's a bomb, two very different circumstances.  
 14 MS STEVENS: Or if it's a bomb and it's a contained incident  
 15 of one bomb.  
 16 THE CHIEF CORONER: We're getting some way away from the  
 17 topic a little bit, Ms Stevens. I've given you a fair  
 18 degree of leeway not interrupting, but if we can try and  
 19 keep matters within a reasonable ambit, I would be  
 20 grateful.  
 21 MS STEVENS: Hopefully my next question will make clear why  
 22 this is, in my submission, absolutely relevant.  
 23 So if you were at Carriage Gates and you had been  
 24 aware of all of those factors that you said would make  
 25 it clear that you certainly needed to have your firearm

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1 raised, that is a situation where you would know that  
 2 there is a real need for a firearm; that's right, isn't  
 3 it?  
 4 A. Yes.  
 5 Q. Yes. Because if you look at the situation, if you were  
 6 there at Carriage Gates with all of those factors known  
 7 to you, including somebody saying that there's  
 8 an individual stabbing with knives, you would know,  
 9 wouldn't you, that your unarmed colleagues are not going  
 10 to be able to deal effectively with an assailant armed  
 11 with knives; you would know that, wouldn't you?  
 12 MR KEITH: I'm so sorry, that is a question with about four  
 13 or five subjunctive clauses in it based on  
 14 hypothetical facts that the officer has already  
 15 rejected. It is not a question; it is a series of  
 16 submissions wrapped up in a proposition.  
 17 THE CHIEF CORONER: I'd sort of indicated just now,  
 18 Mr Keith, we are getting some way away from what the  
 19 questions should be focused on.  
 20 MS STEVENS: Sir, in terms of that interjection, we all know  
 21 the question that's --  
 22 THE CHIEF CORONER: Can I suggest that you break the  
 23 question down?  
 24 MS STEVENS: Of course.  
 25 THE CHIEF CORONER: Because it was (a) extremely long, (b)

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1 it involved quite a number of different questions within  
 2 one question.  
 3 MS STEVENS: Of course, but in my submission, we all know --  
 4 THE CHIEF CORONER: Can we just have the question put and  
 5 see what the answer is, in a way that the officer and  
 6 everyone else can follow what it is.  
 7 MS STEVENS: Of course.  
 8 THE CHIEF CORONER: I'm also unclear in your proposition  
 9 whether you are wrapping into it the noise, which is the  
 10 first thing this officer hears, because that was absent  
 11 when you put that very complicated proposition to him  
 12 that seemed to be present just a little while ago.  
 13 MS STEVENS: Sir, I would hope that each time I put the  
 14 question I don't have to put the relevant factors.  
 15 THE CHIEF CORONER: But what you are saying is "with all  
 16 those factors", and does that include the factor of  
 17 hearing the explosion, or hearing what the officer  
 18 thinks is an explosion?  
 19 MS STEVENS: Sir, perhaps if I can deal with it this way:  
 20 I'll put again the relevant factors. From there on in  
 21 I would be very grateful if that could then be dealt  
 22 with without having to put the factors each and every  
 23 time I ask the question.  
 24 So, officer, to go back, if you were at  
 25 Carriage Gates, you would be aware of the following,

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1 wouldn't you: first of all --  
 2 A. Just to clarify, ma'am --  
 3 Q. No, sorry, can I just ask the question, please?  
 4 THE CHIEF CORONER: I'm quite interested to hear what it is.  
 5 A. Just to clarify, you're asking me if I was at  
 6 Carriage Gates at the time of the attack, as in from  
 7 when the vehicle hit the wall? If that's the point you  
 8 want me to answer this question?  
 9 MS STEVENS: If I put to you the relevant factors that  
 10 you --  
 11 THE CHIEF CORONER: Is that what -- is that part of your  
 12 proposition, Ms Stevens?  
 13 MS STEVENS: If I could put the factors it will become --  
 14 THE CHIEF CORONER: Could I have an answer to the question:  
 15 is that part of it, that the officer is to place himself  
 16 at Carriage Gates when this is happening?  
 17 MS STEVENS: It's the very first one I'm about to say, if  
 18 I may.  
 19 The relevant factors are as follows, all right:  
 20 number one, you hear the sound of an explosion; number  
 21 two, you see 50 to 100 people running past you; number  
 22 three, you hear that those people are screaming in pain;  
 23 number four, you can see that those people have a look  
 24 of absolute panic on their faces; number five, somebody  
 25 is indicating behind them, and; number six, you are

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1 aware that there is reference to somebody stabbing with  
 2 knives. Those are the six relevant factors that I am  
 3 putting to you, all right? So from here on in I'm going  
 4 to refer to those as being the situation that you were  
 5 aware of at Carriage Gates; is that understood?  
 6 THE CHIEF CORONER: And you are positioned at  
 7 Carriage Gates, which I think is the question that  
 8 I asked for clarification of right at the beginning.  
 9 MS STEVENS: Yes. So are you clear that when I say that's  
 10 the situation you're aware of at Carriage Gates, it  
 11 encompasses all of those six factors? Is that clear or  
 12 would you like me to deal with that?  
 13 A. So just to be clear you want me to answer a question  
 14 that if I was at Carriage Gates and I heard an explosion  
 15 and then all those other -- and then I'd have had to  
 16 have heard all those other things and seen those other  
 17 things as well and give you an answer of what I would  
 18 have done. I take it that's what you're asking me?  
 19 Q. I'm just asking you at the moment, are you clear that  
 20 those were the six factors that you were aware of and  
 21 that I'm then going to ask you about; are you clear  
 22 about those six factors?  
 23 A. I'm getting lost. I wasn't aware of any of these  
 24 factors because I wasn't there.  
 25 THE CHIEF CORONER: Can I suggest, Ms Stevens you simply put

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1 the question you want to ask. Can I suggest you simply  
 2 put the question you want to ask, because we've gone  
 3 through these factors a number of times.  
 4 MS STEVENS: Sir, do you want me to deal with the location  
 5 because you asked me to deal with that.  
 6 THE CHIEF CORONER: No, I think you've answered, the officer  
 7 is to assume he is at Carriage Gates and he sees six  
 8 factors are in place.  
 9 MS STEVENS: Right.  
 10 THE CHIEF CORONER: So what is the question?  
 11 MS STEVENS: So before I put it, I've got to put it in  
 12 context, sir. So when you asked you about those factors  
 13 previously, your answer was that if you had been at  
 14 Carriage Gates and aware of all of that, you would  
 15 certainly have had your weapon raised and ready to use;  
 16 do you remember saying that?  
 17 A. Yes, and I answered that with the context of that --  
 18 those issues on -- you know, on their own, not including  
 19 obviously what had gone on before.  
 20 Q. Sorry. If you had been aware of those six factors at  
 21 Carriage Gates, would you or would you not have raised  
 22 your weapon?  
 23 A. Yes. But what I'm saying is that if you're asking me to  
 24 answer that question taking into consideration the  
 25 vehicle hitting the wall as well, then obviously I can't

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1 answer that question.  
 2 Q. Right. If you are at Carriage Gates, you're not going  
 3 to know if a vehicle has hit the wall, are you?  
 4 A. Of course you are, yes.  
 5 Q. Right. Can you just deal with the six factors. I want  
 6 to move on. If you were aware of those matters, the  
 7 reason you would have your firearm raised is because  
 8 there would be the clear potential of an armed attack by  
 9 a man with knives, wouldn't there?  
 10 A. Yes. Yes.  
 11 Q. Right. So you would be aware that an attack at  
 12 Carriage Gates could occur with somebody armed with  
 13 knives?  
 14 A. Yes, ma'am.  
 15 Q. You would know that if you left that post, you would be  
 16 leaving that area to unarmed officers, wouldn't you?  
 17 A. Unfortunately that was the case across that sector,  
 18 ma'am.  
 19 Q. No, I'm just asking about what you would know. You  
 20 would know, wouldn't you, that if you left  
 21 Carriage Gates, which was under threat of an armed  
 22 attack, it would be left to unarmed officers. You would  
 23 know that, wouldn't you?  
 24 A. Well, yes.  
 25 Q. Unarmed officers are going to be no effective assistance

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1 to somebody armed with a knife, are they?  
 2 A. No, they would be certainly at a disadvantage, ma'am.  
 3 Q. They're not going to be at a disadvantage; they're not  
 4 going to be effective protection, are they, against  
 5 somebody with a knife if they have nothing other than  
 6 an asp?  
 7 A. That's correct, ma'am.  
 8 Q. Right. You would know that, wouldn't you?  
 9 A. Well, yes, ma'am.  
 10 Q. Yes, because you know that the unarmed officers don't  
 11 even have a taser, don't you?  
 12 A. That's correct, ma'am.  
 13 Q. You would therefore know that they would be highly  
 14 vulnerable to an assailant with knives, wouldn't you?  
 15 A. Yes, ma'am.  
 16 Q. You are not going to leave those highly vulnerable  
 17 unarmed officers to deal with that threat, are you?  
 18 A. Unfortunately, ma'am, with the way the patrol was at the  
 19 time, not only were -- we couldn't be at all those  
 20 locations at once, so unfortunately that was the  
 21 situation at the time.  
 22 Q. No, no, just look at that. Are you saying that if you  
 23 had been in that situation, you would have your firearm  
 24 raised, you would know there was a threat of an armed  
 25 assailant, are you saying you would have just wandered

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1 off and left those unarmed officers?  
 2 A. Oh, no, no, no, no. I'm getting -- I was getting  
 3 confused with what you're asking me. No, of course  
 4 I wouldn't, no.  
 5 Q. Of course you wouldn't. You wouldn't have wandered off  
 6 and left your unarmed colleagues to deal with somebody  
 7 who had knives, would you?  
 8 A. No, I thought you were talking in context of the daily  
 9 routine, moving away and leaving your unarmed  
 10 colleagues. Not on that particular incident.  
 11 Q. Right. So dealing with that particular incident and the  
 12 factors I've just told you about, not only would you not  
 13 leave your unarmed colleagues, you wouldn't leave that  
 14 main entrance point to the Palace of Westminster  
 15 unarmed, would you?  
 16 A. Do you mean in respect of the vehicle going into the  
 17 perimeter fence?  
 18 Q. No, I'm talking about you're standing there with your  
 19 firearm raised, knowing that at any moment there could  
 20 be an armed attack at Carriage Gates. You would know,  
 21 wouldn't you, that if you left, not only would your  
 22 unarmed colleagues be at risk, you would also be leaving  
 23 that area of the Houses of Parliament open to attack,  
 24 wouldn't you?  
 25 A. If those circumstances presented themselves, then of

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1 course you would remain there and deal with the threat,  
 2 neutralise the threat.  
 3 Q. In terms of staying there, then, that's the decision you  
 4 would have made, to stay and neutralise the threat.  
 5 A. Again, bringing this back into the context of -- in  
 6 context of the incident, if the vehicle, as it did do,  
 7 went into the perimeter wall, leading us to believe that  
 8 there was an explosion, or the threat was there, then  
 9 obviously we would have gone over to deal with that, or  
 10 at least gone towards it.  
 11 Q. So are you saying then that you would have left your  
 12 unarmed colleagues to the risk of an attack with --  
 13 MR KEITH: I'm so sorry --  
 14 MS STEVENS: No, I'm going to ask the question, please.  
 15 MR KEITH: -- no, no, no, I am entitled to raise my genuine  
 16 concern to the Chief Coroner about this style/school of  
 17 examination. It is not optimally designed to elicit  
 18 relevant and sensible evidence. It is the repeated  
 19 putting of a set of facts which did not occur.  
 20 THE CHIEF CORONER: No.  
 21 MR KEITH: And then asking the officer to comment on what he  
 22 might or would have done if something which never  
 23 occurred, did occur. All this is designed to do is to  
 24 put scenarios which have no relevancy to this Inquest in  
 25 a way designed to make it look as if the officer or the

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1 system in some way failed because it failed to respond  
 2 to the threat at the gate.  
 3 The explosion took place, in the understanding of  
 4 the officers, before Masood appeared at the gate, and  
 5 therefore it is simply not right to put to the officer  
 6 this absurd conundrum that he couldn't deal with both  
 7 the explosion and a man at the gate. They occurred in  
 8 sequence, not simultaneously.  
 9 MR MOSS: Sir, may I say that the interests of my client on  
 10 this issue perhaps are secondary, but I entirely agree  
 11 with the concerns that have been raised by Mr Keith. It  
 12 seems to me, with great respect, that when my learned  
 13 friend gets an answer she doesn't like she has another  
 14 go at putting it in a slightly different way, but the  
 15 point has been reached where this should stop, in my  
 16 respectful submission.  
 17 THE CHIEF CORONER: We have certainly, Ms Stevens had these  
 18 propositions put a number of times. I'm going to  
 19 suggest that we should move on to a different topic,  
 20 because it seems to me that so far as the factors that  
 21 you have put, the one thing which is absent from all of  
 22 that is the car hitting the wall, and so it seems to me  
 23 that the officer has done his best to answer the  
 24 propositions you have put to him, so I would invite you,  
 25 please, to move onto a different topic.

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1 MS STEVENS: Sir, I completely appreciate that. Could  
 2 I have any opportunity to deal with the submissions that  
 3 have been made, because you've heard the objection, but  
 4 not the response.  
 5 THE CHIEF CORONER: I'll certainly hear what you have got to  
 6 say --  
 7 MS STEVENS: Thank you.  
 8 THE CHIEF CORONER: -- but as I say, I've expressed a couple  
 9 of times that it seems to me that we've gone over this  
 10 a couple of -- or more than two times, and the  
 11 clarification that I sought, you weren't very  
 12 forthcoming in giving me a straight answer to a straight  
 13 question when I interrupted you a little bit earlier on.  
 14 But I will certainly hear what you've got to say  
 15 but, as I've indicated, we are straying quite a long way  
 16 from the issues that I think this officer may be able to  
 17 help you with.  
 18 MS STEVENS: Sir, can I raise three matters by way of  
 19 response.  
 20 First of all, the family are not putting forward  
 21 an absurd series of propositions. What's being put  
 22 forward are the factors that we know those who were  
 23 present at Carriage Gates were aware of. Therefore,  
 24 every factor that has been advanced is extracted from  
 25 the eyewitness evidence of those at Carriage Gates. Not

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1 an absurd proposition but evidence.  
 2 Second of all, we all know that the issue is going  
 3 to be whether or not it would have made any difference,  
 4 the problems with the systems, and we all know what  
 5 questions the Metropolitan Police Service in reality are  
 6 going to ask of this officer. So in my submission it  
 7 would be quite wrong for the family not to be able to  
 8 deal with this knowing exactly the fact that as soon as  
 9 I sit down, my learned friend is going to rise and deal  
 10 with this very issue, albeit in a different way bearing  
 11 in mind who he is representing.  
 12 Third of all, the family is in this position because  
 13 there is, somewhat surprisingly, no expert, and  
 14 therefore there is no firearms expert who has seen the  
 15 CCTV, who has read all the relevant evidence, who the  
 16 family can ask these questions to. All the family want  
 17 is to have an opportunity to put answers -- sorry, to  
 18 put questions to see whether or not the failures of the  
 19 system would have made a difference.  
 20 THE CHIEF CORONER: I take the view, Ms Stevens, that you  
 21 have put very carefully different propositions to this  
 22 officer, and he has responded. My response to you is  
 23 that I think it's time to move on to a different topic.  
 24 MS STEVENS: Could I just deal with -- and it's a different  
 25 area, which is why I raise it, it's not to go behind

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1 your ruling in any way. What I was hoping to move on to  
 2 when the interruption came was the fact that I've dealt  
 3 with the officers being vulnerable if the AFO left,  
 4 I haven't dealt with the location being vulnerable. Am  
 5 I allowed to ask a few questions about that? If it  
 6 won't help you, sir, bearing in mind, of course, you  
 7 will be making the determinations, then of course  
 8 I won't ask those questions, I'll move on to a different  
 9 topic.  
 10 THE CHIEF CORONER: You can certainly ask a question about  
 11 the site being vulnerable.  
 12 MS STEVENS: Thank you.  
 13 If you had -- if the AFO at Carriage Gates had moved  
 14 away to the site of the collision, that location leading  
 15 to the members' entrance would have no armed officers  
 16 covering it; that's right, isn't it?  
 17 A. Yes, ma'am.  
 18 THE CHIEF CORONER: And by "AFO" you mean, presumably, both  
 19 AFOs?  
 20 MS STEVENS: Yes, I was going to come on to that, if I may,  
 21 which I'll do straightaway.  
 22 In terms of the questions that are being asked, it's  
 23 about an AFO having to make a decision whether or not to  
 24 stay at Carriage Gates in the circumstances, or whether  
 25 to leave Carriage Gates and go over to where the

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1 explosion noise is coming from, and you understand that  
 2 choice?  
 3 A. Yes, ma'am.  
 4 Q. If an AFO is facing that choice, it's a very difficult  
 5 one, isn't it?  
 6 A. Very much so, ma'am.  
 7 Q. Yes. Very much so, because it's either stay and guard  
 8 that location and the unarmed colleagues, or go over  
 9 towards the explosion.  
 10 A. Yes, but you've got to remember at that time as well,  
 11 ma'am, that we didn't believe that we had any specific  
 12 obligation to the gate at that time as part of the  
 13 patrol.  
 14 Q. No. You didn't, and we're not going to go back on that.  
 15 But a security system shouldn't require an AFO to make  
 16 a decision and a choice like that, should it?  
 17 A. Well, it's something that we have to do, I suppose.  
 18 I don't see --  
 19 Q. You would have had to have made that decision because  
 20 there were only two of you; that's right, isn't it?  
 21 A. To go towards the perimeter fence?  
 22 Q. Yes?  
 23 A. We would have made that decision because there was  
 24 a clear and present threat that we had to go and deal  
 25 with.

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1 Q. Right.

2 A. And that's ultimately what we believed we were there to

3 do.

4 Q. But what about the clear and present threat at

5 Carriage Gates?

6 A. Well, if you're talking in context and in sequence, at

7 that time, there wouldn't have been.

8 Q. No, no, with the factors that we have dealt with --

9 THE CHIEF CORONER: We're not going to go back over the ...

10 MS STEVENS: All right, sir, I agree, we are.

11 In terms of that decision, there are two of you, so

12 if an AFO, when there are two of you, if you've got this

13 decision of there's a risk of a threat in location A and

14 there's a risk of a threat in location B, would you

15 separate? Would one of you go to A and one of you go to

16 B?

17 A. No, ma'am.

18 Q. No. So the only choice you have is to respond to A and

19 ignore B, or respond to B and ignore A? That's the only

20 choice.

21 A. The choice is respond to A and deal with A.

22 Q. Yes, but in doing that, it's common sense, isn't it,

23 you're having to ignore B.

24 MR KEITH: There wasn't a B.

25 THE CHIEF CORONER: No, I think we're back where we were,

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1 Ms Stevens.

2 MS STEVENS: Well, sir, in response of that, the

3 Metropolitan Police Service may say there wasn't a B.

4 The family would say of course there's a B, it's the

5 threat that's clear at Carriage Gates.

6 THE CHIEF CORONER: As I say, I think I've got the points

7 that you have put to PC Sanders quite clearly.

8 MS STEVENS: Thank you. Just one moment. (Pause).

9 Thank you.

10 MR ADAMSON: Sir.

11 THE CHIEF CORONER: Mr Adamson.

12 MR ADAMSON: I appreciate I have done my examination. Might

13 I be permitted just very shortly to explore one topic?

14 THE CHIEF CORONER: Certainly.

15 Further examination by MR ADAMSON

16 MR ADAMSON: PC Sanders, you've been asked questions about,

17 in effect, what you would have done if you had been in

18 a different location. We know that there was a bang and

19 that your attention was drawn towards it; that's

20 correct, isn't it?

21 A. Yes, sir.

22 Q. And at the time that that bang occurred, you were in the

23 vicinity of the colonnade?

24 A. Correct, sir.

25 Q. If you had been at the gates, you still would have heard

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1 the bang, would you not?

2 A. Yes, sir.

3 Q. It was that loud. But your perspective at the gates is

4 different from the colonnade, isn't it, in terms of what

5 you can see and what you're aware of?

6 A. Yes, sir.

7 Q. And so from the colonnade, you would not be aware, would

8 you, of the presence of people running past the gate?

9 A. No, sir.

10 Q. From the colonnade, you would not be aware, would you,

11 of the fact that people were shouting, or a person was

12 shouting "There's a man with bloody big knives"; you

13 wouldn't be aware of that, would you?

14 A. No.

15 Q. If you had been in the vicinity of the Carriage Gates

16 when the bang occurred, albeit that you would have had

17 your attention drawn towards the location of the bang

18 and moved towards it, you would have been in a far

19 better position, wouldn't you, to be aware of those

20 other factors?

21 A. I can only speculate, sir. I wasn't there, and with the

22 noises and everything that was happening, I wouldn't be

23 able to answer that.

24 Q. No. But you are much more likely, aren't you, to hear

25 those noises and to see those people from a position

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1 near the gates than you would be by the colonnade?

2 A. It would have given me a different perspective --

3 Q. Yes.

4 A. -- on what I'd seen from the position where I was.

5 Q. Yes, a different perspective and, would you accept,

6 a better perspective?

7 A. Again, I wasn't there, sir, I can't ...

8 Q. Closer to where the threat effectively emerged?

9 A. It's possible obviously that had I seen different

10 things --

11 Q. Yes.

12 A. -- the information as it came to me.

13 Q. Of course.

14 A. But obviously I wasn't there and I wouldn't like to

15 comment, sir.

16 Q. And so when I asked you earlier today that if you are at

17 or in the vicinity of the gates you've got

18 an opportunity to intervene, that remains correct,

19 doesn't it?

20 A. It does remain correct, sir, it does.

21 Q. Yes. Whereas, if you are at the colonnades, you have no

22 opportunity to intervene?

23 A. I think the point in question is that the sequence of

24 events of how this unfolded is that it was just very

25 unfortunate that it unfolded the way it did.

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1 Whatever — wherever we were within that patrol area, we  
 2 would have been distracted by the vehicle or the  
 3 explosion is what we thought at the time.  
 4 MR ADAMSON: PC Sanders, those are my questions.  
 5 THE CHIEF CORONER: Mr Keith.  
 6 Examination by MR KEITH QC  
 7 MR KEITH: PC Sanders, you know that I am Hugo Keith and  
 8 I appear on behalf of the Metropolitan Police Service.  
 9 A. Yes, sir.  
 10 Q. Can we start with the ADAM system, please, PC Sanders?  
 11 A. Yes, sir.  
 12 Q. We know that you never logged into the system, that's  
 13 the information you were given as a result of the  
 14 report, the MM1 report, the matter that you discussed  
 15 with Superintendent Audrey Shannon?  
 16 A. Yes, sir.  
 17 Q. You've been asked some questions about that process, and  
 18 Ms Stevens attempted to suggest to you that you had in  
 19 some way been unfairly treated in that misconduct  
 20 process because the officers who conducted it didn't  
 21 speak to you in the course of it. The outcome of that  
 22 process was, wasn't it, that there was no actual  
 23 misconduct process?  
 24 A. That's correct, sir.  
 25 Q. And that's why you weren't spoken to during the process.

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1 But at the end —  
 2 MS STEVENS: Well, sorry, sir, I do interrupt. I asked one  
 3 question in relation to that, whether or not this  
 4 officer was spoken to. This officer has said he wasn't  
 5 even aware of the misconduct process, so in my  
 6 submission, he can't deal with whether or not it's fair.  
 7 He is not the appropriate witness and we are now dealing  
 8 with comment.  
 9 MR KEITH: PC Sanders, were you shown or given  
 10 a Regulation 15 notice?  
 11 A. No, sir.  
 12 Q. That is the notice which you are given at the  
 13 conclusion, or the commencement, I apologise, of  
 14 a formal misconduct process.  
 15 You spoke to Superintendent Audrey Shannon who told  
 16 you that there had been a process which had not ended in  
 17 misconduct, but it ended in you being given words in  
 18 relation to your performance, and that was the end of  
 19 it?  
 20 A. Yes, sir.  
 21 Q. Yes. You didn't expect, did you, that officers would  
 22 speak to you whilst they were investigating the issue of  
 23 whether to start a misconduct process; they spoke to you  
 24 at the end of that process when it was decided to take  
 25 no further action?

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1 A. Yes, sir.  
 2 Q. So you weren't treated unfairly, were you?  
 3 A. No, sir.  
 4 Q. In relation to the ADAM system, we know that you never  
 5 logged on, but have you logged on since March 2017?  
 6 A. Yes, sir.  
 7 Q. Can you just help, please, the Chief Coroner with how  
 8 the system works: you log on with a user name and,  
 9 I don't know, a PIN number, perhaps?  
 10 A. If you are on the Parliamentary and Diplomatic Command,  
 11 they have their own intranet system within an intranet  
 12 system, which you're given access to when you join the  
 13 command. And within that, at the very, very top, A, for  
 14 Adam, is the post deployment system, and I believe it's  
 15 all single-user sign-on, so now when you click it, it  
 16 will just take you onto the system.  
 17 Q. You've got the better of me technologically there,  
 18 PC Sanders. When you go to the website and the link for  
 19 the Armed Deployment Authorities Management system,  
 20 ADAM, is there a page in it, a spot on the screen, where  
 21 you can go to post instructions for your post?  
 22 A. Yes.  
 23 Q. And is it fairly clear?  
 24 A. Yes.  
 25 Q. Yes. There is wording saying "post instructions" or

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1 "post" or "mobile post" or "fixed post" or something  
 2 like that and you go to it and you can find your post  
 3 instructions?  
 4 A. Yes.  
 5 Q. And have you done that frequently since March 2017?  
 6 A. Yes, sir.  
 7 Q. It's not that difficult, is it?  
 8 A. No, sir.  
 9 Q. But as we know, you didn't do it before March 2017?  
 10 A. No, sir.  
 11 Q. Had you done that, you would have found the post  
 12 instructions?  
 13 A. Yes, sir.  
 14 Q. Everybody knew that there was a terminal and a website  
 15 and an ADAM system there available for use?  
 16 A. Yes.  
 17 Q. And no doubt, I suppose we could check if we had to, how  
 18 many people logged on and when and over what sort of  
 19 period, but you don't know, do you, how many of your  
 20 fellow officers logged on and when and how?  
 21 A. I would have no idea, sir.  
 22 Q. All you can say is you didn't.  
 23 A. Yes, sir.  
 24 Q. But you don't know about others?  
 25 A. No, sir.

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1 Q. But you agreed that had you logged on, and had everybody  
2 logged on, there would have been no doubt or difficulty  
3 about finding the post instructions and seeing what you  
4 were meant to patrol?  
5 A. Yes, sir.  
6 Q. The sector 3 map on the wall, we know now that that map  
7 had at its bottom alarm locations. It says "Alarm  
8 locations". And it's obvious from what you said, if  
9 I may say so, that you followed the map; you have told  
10 us you followed the map. But the map on the wall didn't  
11 say anywhere on it "These are the post instructions", or  
12 the "post patrol notes" or the "patrol notes" or the  
13 "post notes"?  
14 A. No, sir.  
15 Q. No. It was a map?  
16 A. Yes, sir.  
17 Q. And the map didn't change, did it?  
18 A. No, sir.  
19 Q. But you had, I think, during the event, during the years  
20 up to March 2017, received emails, because you've told  
21 us that you received an email from Superintendent Causer  
22 dated some point in ...?  
23 A. February 2017, sir.  
24 Q. Thank you very much, 2017, in which you were told, you  
25 were given a briefing about changes to the security

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1 system in Westminster?  
2 A. Proposed changes, sir.  
3 Q. Yes. It was a plan, wasn't it, due to come into effect  
4 in April.  
5 A. That's correct.  
6 Q. But, of course, everything was swept away by the  
7 appalling events of March 2017?  
8 A. That's correct, sir.  
9 Q. So you obviously received emails. You were receiving  
10 emails before March 2017.  
11 A. In relation to?  
12 Q. Well, this was a briefing about security arrangements,  
13 which you've told us you were aware of because you  
14 received the email?  
15 A. Yes, sir.  
16 Q. So you must have been receiving emails?  
17 A. Yes, sir.  
18 Q. And you must have been looking at your emails?  
19 A. Yes, sir.  
20 Q. And you must also, whilst you may not be able to  
21 remember now, have received emails about other  
22 briefings?  
23 A. Quite possibly, sir.  
24 Q. And do you accept that those emails and other briefings  
25 may have included emails about post instructions and

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1 changes to the patrolling area?  
2 A. I can't comment on that, sir. I don't recall any such  
3 emails.  
4 Q. You just don't know?  
5 A. I just wouldn't know.  
6 Q. Had you gone back and checked your email logs?  
7 A. I have, sir.  
8 Q. You have, have you? And have you looked at the years  
9 leading up to March 2017 and seen whether you got emails  
10 from the inspectors and sergeants and other officers  
11 in ...?  
12 A. Nothing specifically related to post notes except that  
13 document, sir.  
14 Q. Are you aware that the post instructions change  
15 repeatedly between May 2010 and December 2015?  
16 A. I did not, sir.  
17 Q. Do you now realise that they did?  
18 A. Yes, sir.  
19 Q. And you don't know whether or not, of course, those post  
20 instructions were sent out by sergeants and inspectors  
21 to the group SO16, SO6, is it, SO7?  
22 A. It changed quite frequently, yes.  
23 Q. Right. There was a group email, wasn't there --  
24 A. Yes, sir.  
25 Q. -- for all officers of PC rank at the

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1 Palace of Westminster?  
2 A. Mm-hm.  
3 Q. But you can't recall receiving those?  
4 A. Well, if it had gone out to the Palace of Westminster,  
5 I wasn't on the team in 2015, so I wouldn't have  
6 received that anyway.  
7 Q. Ah, is that because you moved from the temporary team,  
8 if you like, to a member of the permanent team?  
9 A. I was -- became -- joined the permanent team  
10 in January 2016.  
11 Q. After that, were you part of the email system then?  
12 A. Yes, sir.  
13 Q. So it's possible that you would have received emails  
14 about briefings and patrols, but you just don't recall  
15 it?  
16 A. I have looked, sir, I couldn't find any.  
17 Q. All right. In relation to the map on the wall, do you  
18 recall whether it said anything about fixed or mobile  
19 posts?  
20 A. No, sir.  
21 Q. It never changed, did it?  
22 A. No, sir.  
23 Q. Did you ever think to yourself: this is curious, it says  
24 nothing about fixed or mobile patrols or how the short  
25 patrols were to be conducted or, indeed, it says nothing

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1 about the changes which have come in over time?  
 2 A. No, sir, it was ...  
 3 Q. Just a map?  
 4 A. It was just a map that everyone followed for the years  
 5 before I arrived there and the time subsequently after  
 6 I arrived.  
 7 Q. Do you recall in the base room there being a shelf upon  
 8 which there were hard-copy binders and files containing  
 9 sector notes, patrol notes, and you've told us about how  
 10 when you come on duty you're told what your hours --  
 11 your duties are --  
 12 A. Yes, yes, sir.  
 13 Q. -- and post instructions in binders in the room?  
 14 A. I was never aware of any -- the folder with post  
 15 instructions in, sir, no.  
 16 Q. Do you remember in the room there being a shelf with  
 17 binders on it?  
 18 A. I remember being -- yes, sir, yes.  
 19 Q. With papers in them, with documents in them?  
 20 A. There were, yes, all sorts of binders with all sorts of  
 21 papers in.  
 22 Q. All right, but you didn't go and look at them yourself?  
 23 A. No, sir.  
 24 Q. Did you ever look at the spines on the binders or what  
 25 they included?

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1 A. No, sir.  
 2 MS STEVENS: Sir, I'm really sorry to rise, but you will  
 3 remember yesterday that we did make the point that the  
 4 family has asked for disclosure of what was in the  
 5 folder in the base room. We're now hearing about  
 6 a folder and binders. We had sought disclosure of this  
 7 material before these officers were called.  
 8 THE CHIEF CORONER: Yes. But as, I think yesterday  
 9 I stopped Mr Keith from doing anything more other than  
 10 simply dealing with the existence of a binder. I mean,  
 11 at the moment PC Sanders has simply said that he was  
 12 aware of a shelf, there being binders on the shelf, but  
 13 he didn't look at them.  
 14 MS STEVENS: Yes, and that's why I didn't rise immediately,  
 15 but we are then getting into the area of post notes, and  
 16 that's why I rose.  
 17 THE CHIEF CORONER: Absolutely. As he didn't look inside  
 18 them, we don't know what was inside them.  
 19 MS STEVENS: No, but if these questions are being asked,  
 20 they can only be asked if they have some relevance, and  
 21 therefore, if there is relevant evidence, we would ask  
 22 for the disclosure request to be met.  
 23 THE CHIEF CORONER: Yes. That may be a good request,  
 24 Ms Stevens. At the moment, the officer can't help me  
 25 because he didn't actually look in any of the binders.

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1 MS STEVENS: No.  
 2 THE CHIEF CORONER: He is aware of binders being there, but  
 3 actually what they contained, he can't tell me one way  
 4 or the other.  
 5 MS STEVENS: No. It just would help that bearing in mind  
 6 these questions are being asked of these witnesses if we  
 7 were given the answer to disclosure requests, we might  
 8 have questions to ask. So that's why I rise.  
 9 THE CHIEF CORONER: Well, again, you can only ask a question  
 10 of any assistance if someone has actually seen the  
 11 documents.  
 12 MS STEVENS: And you would only ask a question, of course,  
 13 if you knew what the answer was going to be, which is  
 14 why we've asked no questions at all on the subject.  
 15 THE CHIEF CORONER: As I say, at the moment I'm not getting  
 16 any assistance -- I don't mean that critically, I am  
 17 just stating a fact. The fact that somebody knows they  
 18 see a binder on a wall, they don't know what it  
 19 contains, it may be blank paper.  
 20 MS STEVENS: Of course.  
 21 THE CHIEF CORONER: So it's actually not helping me one way  
 22 or the other at the moment, because this officer, in  
 23 fairness to him, didn't look in them.  
 24 MS STEVENS: Of course.  
 25 THE CHIEF CORONER: So I don't think Mr Keith can really

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1 take that matter any further with this witness.  
 2 MS STEVENS: I'm very grateful, thank you.  
 3 MR KEITH: Sir, if I may say so, with respect, you're  
 4 absolutely right. I am putting what Commander Usher has  
 5 said in his statement which my learned friend, if she  
 6 has read it, will know, which is that there is  
 7 a hard-copy binder containing post instructions in the  
 8 base room and therefore I'm obliged to put that, and the  
 9 officer has answered the question.  
 10 You accept that there is a binder, but because you  
 11 didn't look, you don't know what was in it or that ...?  
 12 A. I know that there was a binder with post notes which was  
 13 created post 22 March. I'm aware of the existence of  
 14 that one, but I wasn't aware of any binder containing  
 15 post notes pre-22 March.  
 16 Q. But there were binders, but you don't know what was in  
 17 them?  
 18 A. There were a number of binders, yes, but no --  
 19 Q. And they might or might not have contained post  
 20 instructions, you just don't know, because you didn't  
 21 look?  
 22 A. Yes, I couldn't possibly say.  
 23 Q. Because you didn't look.  
 24 In relation to the post instructions that you now  
 25 know were in force for March 2017, we know that post

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1 instructions came out on 16 January 2015 and then were  
 2 amended in December 2015. You now know that they state  
 3 that the patrolling AFOs should not patrol specifically  
 4 as a pair; that they should maintain a close proximity  
 5 to Carriage Gates; and that there should be a short  
 6 patrol, or rather emphasis should be placed upon the  
 7 area between the exit from the Cromwell Green search  
 8 site and Carriage Gates.  
 9 A. Yes, sir.  
 10 Q. Those post notes put emphasis upon Carriage Gates and  
 11 an area directly connected to Carriage Gates; namely the  
 12 area from, I suppose, Carriage Gates towards the  
 13 members' entrance, past the Cromwell Green search point;  
 14 yes?  
 15 A. Yes, sir.  
 16 Q. You've said that there was a time, however, when the  
 17 patrols had not been mobile at all, they had been fixed.  
 18 A. Yes, I was never party to that. I wasn't on the command  
 19 then, sir.  
 20 Q. I was going to ask you that. Is that something that you  
 21 have been led to understand by somebody else or  
 22 something that you saw yourself?  
 23 A. Yes, just by people speaking "It used to be like this or  
 24 that".  
 25 Q. It appears, PC Sanders, that the issue of the exact

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1 nature of the patrol was a matter of some debate because  
 2 people perhaps grumbled to you that once upon a time it  
 3 had been a fixed patrol and now it was mobile. Maybe  
 4 there was -- your officers would say to you: what about  
 5 Cromwell Green, or: what about the members' entrance?  
 6 It was obviously a matter of debate?  
 7 A. Yes, sir, very much so.  
 8 Q. But it's not right to say, is it, therefore, that your  
 9 clear understanding is that there was once upon a time  
 10 a fixed post at Carriage Gates, and officers stood there  
 11 and never moved anywhere. You don't know?  
 12 A. I've never seen any post notes to suggest there was,  
 13 sir, no.  
 14 Q. No. But whilst you've been there, you never saw a fixed  
 15 post on Carriage Gates?  
 16 A. Not on Carriage Gates, sir, no.  
 17 Q. We're not concerned, PC Sanders, with other patrol  
 18 areas. There may well be fixed posts elsewhere.  
 19 The sector 3 map, you have had a look at it now  
 20 again, and that's a map that you saw every day?  
 21 A. Yes, sir.  
 22 Q. And you knew, didn't you, that the map at the bottom  
 23 states in the clearest terms "Alarm locations".  
 24 A. Yes, sir.  
 25 Q. The map is called "Ranger Sector 3" because, as you

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1 understood it, that is the area: ranger sector 3?  
 2 A. Yes, sir.  
 3 Q. But the map said nothing, did it, about where in ranger  
 4 sector 3 you were meant to patrol?  
 5 A. No, sir.  
 6 Q. It's a blue map of the whole area with alarm locations?  
 7 A. Yes, sir.  
 8 Q. There was no mention on the map of Cromwell Green search  
 9 area, other than it's on the map?  
 10 A. Yes, sir.  
 11 Q. There was no mention of short patrols, long patrols,  
 12 sideways patrols?  
 13 A. No, sir.  
 14 Q. Fixed patrols?  
 15 A. No, sir.  
 16 Q. It was just a map.  
 17 As an authorised firearms officer in  
 18 New Palace Yard, your job was to ensure that you reacted  
 19 proportionately, sensibly, professionally, to a threat  
 20 that presented itself?  
 21 A. Yes, sir.  
 22 Q. It is obvious, is it not, PC Sanders, that you could not  
 23 station armed firearms officers every 20 feet around  
 24 New Palace Yard?  
 25 A. No, sir.

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1 Q. Because you don't know where and when a threat may  
 2 emerge, and resources demand, you must have understood,  
 3 that there is no point having countless officers placed  
 4 every 20 feet round the yard to deal with threats which  
 5 might never emerge. That's obvious, isn't it?  
 6 A. That's correct, sir.  
 7 Q. So wherever you were in New Palace Yard, you would never  
 8 know where a threat would emerge from?  
 9 A. No, sir.  
 10 Q. How many sides does New Palace Yard have by way of  
 11 perimeter fence?  
 12 A. Two, sir.  
 13 Q. Bridge Street and Parliament Square. It has  
 14 Carriage Gates, which is obviously the main focus of the  
 15 yard, because it's the primary entrance to that part of  
 16 Parliament?  
 17 A. Yes, sir.  
 18 Q. But were there other areas of the yard, New Palace Yard,  
 19 with which you were generally concerned, with which as  
 20 an experienced firearms officer you had to keep an eye  
 21 on?  
 22 A. The Cromwell Green entrance, which was the main public  
 23 entrance into the Palace. The subway --  
 24 Q. Just pause there. So that we can understand, the  
 25 Cromwell Green entrance is for members of the public who

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1 are being searched; is that right?  
 2 A. Yes, sir.  
 3 Q. Whereas parliamentarians come in through Carriage Gates  
 4 by way of vehicle or pedestrian?  
 5 A. Yes, sir.  
 6 Q. I interrupted, carry on.  
 7 A. The subway entrance which is a pedestrian entrance for  
 8 members and passholders.  
 9 Q. Where does that emerge?  
 10 A. That emerges -- it's a subway, and comes out in the  
 11 colonnades.  
 12 Q. Any other particular worries?  
 13 A. You've got members' entrance itself, which is -- leads  
 14 to access -- I won't name the areas, but it gives quick  
 15 access up to the chamber.  
 16 Q. If a threat presents itself anywhere in the yard, what  
 17 are you expected to do?  
 18 A. Confront it and deal with it and neutralise it.  
 19 Q. In terms of the threat posed by potential terrorists and  
 20 attackers, are there a range of different ways in which  
 21 the threat might present itself in New Palace Yard?  
 22 A. Yes, sir.  
 23 Q. Vehicle-borne IED, improvised explosive device;  
 24 a suicide bomber, a person carrying a bomb; a marauding  
 25 attack; armed attack or a stand-off attack, somebody

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1 firing into New Palace Yard by mortar or gun; climbing  
 2 over the railings, perhaps. Are all those forms of  
 3 threats?  
 4 A. In the current climate, very much so, sir.  
 5 Q. And are those threats that you would have had to have  
 6 had in mind?  
 7 A. Yes, sir.  
 8 Q. Could you have ignored the explosive noise in  
 9 Bridge Street?  
 10 A. No, sir.  
 11 Q. Could it have been a threat?  
 12 A. Yes, sir.  
 13 Q. Was it a threat?  
 14 A. I believed at the time it was, sir.  
 15 Q. Did the noise tell you anything about whether or not it  
 16 was part of an armed attack on that part of  
 17 Bridge Street?  
 18 A. It did when the radio communications came out and said  
 19 that there had been an explosion at Portcullis House.  
 20 Q. Did you know whether the explosive noise was a bang from  
 21 a car on the wall or an explosive attack on the wall  
 22 designed to allow a breach, and an entrance into the  
 23 yard?  
 24 A. That was my concern after the radio communication.  
 25 Q. And so did you have to go towards the noise?

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1 A. Yes, sir.  
 2 Q. At the moment of the noise, had you been at the  
 3 Carriage Gates, and in light of the factors which were  
 4 relentlessly put to you, what would you have done?  
 5 A. Gone to the sound of the explosion, sir.  
 6 Q. There was a suggestion put to you that by leaving  
 7 Carriage Gates, had you been there -- which, of course,  
 8 you were not -- you would in this hypothetical example  
 9 have left unarmed officers vulnerable, and the point  
 10 being made was that that was obviously an undesirable  
 11 state of affairs, that you shouldn't, of course, be  
 12 leaving unarmed officers vulnerable.  
 13 As an AFO, had you been at Carriage Gates with the  
 14 unarmed officers and the explosive noise had occurred on  
 15 Bridge Street, would the presence of unarmed officers at  
 16 the gates been something that would have prevented you  
 17 from going to the noise at Bridge Street?  
 18 A. No, sir.  
 19 Q. The unarmed officers are, of course, officers, and are  
 20 they trained officers tasked with the duty of guarding  
 21 that gate?  
 22 A. Yes, sir.  
 23 Q. It was put to you that you couldn't, of course, be in  
 24 four places at once, and you said in one of your answers  
 25 that you couldn't be in four places at once. Do

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1 threats, in your experience, when they occur, occur in  
 2 multiple ways, that is to say, simultaneously, perhaps  
 3 four threats simultaneously at different places in the  
 4 yard?  
 5 A. Thankfully I haven't experienced too many of them, but  
 6 on this occasion, obviously it did.  
 7 Q. Did they occur at the same time or was there a gap  
 8 between them?  
 9 A. There was a gap, sir.  
 10 Q. And that was a matter of chance, was it not?  
 11 A. I believe so, sir, yes.  
 12 Q. The proposition was put to you, and it was certainly --  
 13 it was put to you elliptically, but it was certainly put  
 14 to PC Ashby, that had you been at Carriage Gates and had  
 15 you ignored the noise at Bridge Street and you had  
 16 stayed there, that you could have shot Masood --  
 17 MS STEVENS: Sorry, sir, I object to that. I see my learned  
 18 friend is also rising, for the widow. This hasn't been  
 19 dealt with with this officer for very good reason  
 20 because when the beginning of the incident was being  
 21 covered, it was objected to on the basis it was  
 22 a hypothetical situation, and this officer's evidence  
 23 was -- and I made, I hope, a verbatim note -- "I wasn't  
 24 there, I wouldn't like to comment", and therefore, in my  
 25 submission, the objection having been made, I didn't

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1 deal with any of that with this officer because that was  
2 his evidence.  
3 MR ADAMSON: Sir, I respectfully agree with that submission.  
4 Mr Keith can't have it both ways.  
5 THE CHIEF CORONER: We certainly had quite a bit of this  
6 covered by Police Constable Ashby in any event, and so  
7 I'm conscious that to some extent, we've been over this  
8 territory quite a bit.  
9 MR ADAMSON: Yes.  
10 THE CHIEF CORONER: Mr Keith. I think that's a cue to you  
11 to move on.  
12 MR KEITH: I respectfully agree with my learned friend,  
13 I can't have it both ways. Eventually I objected, of  
14 course, to the way in which the hypothetical position  
15 was put, but, of course, the whole point being addressed  
16 was what might have happened had Masood been stopped,  
17 but I understand the point.  
18 THE CHIEF CORONER: Yes.  
19 MR KEITH: Can I ask you, please, just some general  
20 questions, then, about your -- the means by which  
21 an experienced authorised firearms officer might  
22 respond, and I'm not going to put it in the context of  
23 Carriage Gates. If a threat presents itself, do you  
24 fire straightaway?  
25 A. That depends what the threat is, the threat to life,

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1 sir. If there's an immediate threat to life, then yes.  
2 Q. Do you have, therefore, first to assess the nature of  
3 the threat?  
4 A. Most definitely, sir.  
5 Q. Once you've assessed the nature of the threat, do you  
6 have to work out, rationalise, decide, obviously as  
7 quickly as you possibly can, what proportionate response  
8 you should take?  
9 A. Yes, sir.  
10 Q. You can't just fire at will at a threat for fear of what  
11 you might do collaterally to people nearby, to other  
12 officers, causing a blue-on-blue --  
13 A. They would be things taken into consideration, but the  
14 primary objective is to preserve life.  
15 Q. Have you ever been confronted yourself by a situation in  
16 which a person armed with a gun, or a knife, or in any  
17 other way, has run at you or towards you whilst you've  
18 been on duty as an authorised firearms officer?  
19 A. No, sir.  
20 Q. Would a reasonable firearms officer have to consider the  
21 proximity of unarmed police officers nearby, or members  
22 of the public, or your own colleagues?  
23 A. It would be a consideration, sir.  
24 Q. And we've heard some mention of a reaction gap, or  
25 a reactionary gap; does that mean anything to you?

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1 A. A reactionary gap is a space in which you can assess and  
2 gather information about what is happening in front of  
3 you so you can make an informed decision on how you're  
4 going to deal with that threat.  
5 Q. Is it to do with the reaction time being, in general  
6 terms, slower than action time? So it's harder to react  
7 to an action that's already occurring?  
8 A. Action will always beat reaction.  
9 Q. There you go.  
10 A. And that's -- in essence that is what an AFO will do, is  
11 react to what's happening in front of them, before they  
12 do -- to give them the justification to discharge their  
13 weapons.  
14 Q. Action will always beat reaction, because the action has  
15 already started and it takes longer to react. But your  
16 training is designed to try to speed up reaction as much  
17 as it can reasonably be sped up; is that right?  
18 A. That's correct, sir.  
19 Q. But you'll always be behind the curve, isn't it --  
20 somebody can get close to you in a very short space of  
21 time?  
22 A. Someone can shut you down, yes, of course, yes, sir.  
23 MR KEITH: Thank you very much, PC Sanders, I have no  
24 further questions.  
25 A. Thank you.

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1 Further examination by MR HOUGH QC  
2 MR HOUGH: PC Sanders, a few final points from me, if I may.  
3 The map on the wall, first of all, I'm not going to show  
4 it again, we've already seen it a number of times. Even  
5 if that were, or were primarily, a map to identify  
6 alarms, it was one which shaded blue sector 3?  
7 A. Correct, sir.  
8 Q. So would it be fair to say that it identified the whole  
9 of New Palace Yard as sector 3?  
10 A. Yes, sir.  
11 Q. I know you hadn't seen the post notes at the time, but  
12 the post notes identified sector 3 as Carriage Gates.  
13 A. Okay, sir.  
14 Q. If you had seen at the time, March 2017, the post notes  
15 identifying sector 3 as Carriage Gates, and the map  
16 showing shaded the entirety of New Palace Yard as  
17 sector 3, would you have seen a difference between  
18 those --  
19 A. Yes.  
20 Q. -- an inconsistency?  
21 A. Yes, sir.  
22 Q. Secondly, the ADAM system. If you had logged onto the  
23 ADAM system and accessed the post notes on that system,  
24 the post notes which you have seen, as has been  
25 suggested you should have done, how would you have

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1 reacted to seeing those post notes describing patrolling  
 2 duties rather different from those which you understood  
 3 to be your duties?  
 4 A. Well, I'd have reacted saying: well, this is completely  
 5 different to what I believed or what I'd been doing up  
 6 to the point where I'd seen the post instructions.  
 7 Q. Would you have asked for guidance?  
 8 A. Yes, most definitely, sir.  
 9 Q. Would you have been surprised at the difference?  
 10 A. Yes, sir.  
 11 Q. Binders in the base room. It was pointed out to you  
 12 that there were a whole number of files on the wall of  
 13 the base room and that you didn't look in them. To your  
 14 knowledge, were you ever asked to look in them?  
 15 A. No, sir.  
 16 Q. To your knowledge, did you ever receive an email  
 17 instructing you regularly to look in those binders or to  
 18 look at them on any particular occasion?  
 19 A. No, sir.  
 20 Q. Next, what you did and what you could have done on the  
 21 day. Now, you have told us that on the day when you  
 22 heard what you thought was the sound of an explosion,  
 23 you went straight there. May we bring up on screen  
 24 {AV0102-ScreenShots/10}.  
 25 If we look at the lower image, we see a screenshot

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1 from the CCTV compilation which DC Overall showed us,  
 2 and we can see that at 14.41.04, Masood was at  
 3 Carriage Gates. That was something like 9 or 10 seconds  
 4 after the collision. Do we see from that synchronised  
 5 split screen image that you and PC Ashby had almost  
 6 reached the area of the down ramp, or up ramp, however  
 7 you look at it --  
 8 A. Yes, sir, up ramp, yes.  
 9 Q. -- by the time that Masood was at Carriage Gates?  
 10 A. Yes, sir.  
 11 Q. So that was the distance you had in fact walked by the  
 12 time that Masood was at Carriage Gates having made that  
 13 decision to go towards the ramp.  
 14 Now, I'm going to put the events as a hypothetical  
 15 to you, leaving that on screen, in the chronology that  
 16 they occurred. Suppose you had been at Carriage Gates,  
 17 and you had heard first of all a bang, as you did, and  
 18 as was audible to those at Carriage Gates. We know that  
 19 that bang took place over five seconds before Masood got  
 20 out of the vehicle at all. And we know that it was  
 21 a number of seconds before people started running and,  
 22 as I say, something like 9 or 10 seconds before Masood  
 23 was at Carriage Gates.  
 24 With that information, having heard the bang, in  
 25 those first couple of seconds when nobody was running

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1 past the gates, what would you have done?  
 2 A. Gone towards the sound of the explosion, sir.  
 3 Q. Now, we have seen how far you walked towards the sound  
 4 of the explosion by the time Masood was at the gates.  
 5 Had you been at Carriage Gates, how far do you think you  
 6 would have got before the same period of time had  
 7 elapsed, that's to say 9 or 10 seconds?  
 8 A. Judging by the map, I would imagine we'd have probably  
 9 reached the end of the Corus barrier, possibly. I don't  
 10 know.  
 11 Again, when you say "at Carriage Gates", we could  
 12 have been by the south gate or the north gate. It's  
 13 all ...  
 14 Q. I'm going to leave that topic there, I hope having dealt  
 15 with it as fairly as I can, we can take that off screen.  
 16 Finally in relation to training, you were asked  
 17 about training in relation to marksmanship, and how you  
 18 are trained to be a very accurate marksman. Are you  
 19 aware, have you ever been told, that marksmanship is  
 20 often less accurate in the heat of live events than in  
 21 training?  
 22 A. Very much, I imagine it is, sir.  
 23 Q. Is that something you've been told in the course of your  
 24 training?  
 25 A. Yes, sir.

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1 Q. Is that something you have to take into account when  
 2 deciding whether to take a shot?  
 3 A. I think it's just something you have to get on and deal  
 4 with, sir, unfortunately.  
 5 MR HOUGH: Thank you very much. Those are all my questions  
 6 of the officer.  
 7 THE CHIEF CORONER: Thank you very much, PC Sanders, you are  
 8 free to go, thank you.  
 9 A. Thank you, sir.  
 10 MR HOUGH: Sir, our next witness is DCI Brown.  
 11 THE CHIEF CORONER: Yes. We didn't take a break because  
 12 I was very keen to complete the witness because I know  
 13 that Mr Adamson you have to leave us at some stage.  
 14 MR ADAMSON: Yes, I might bow out at this point.  
 15 THE CHIEF CORONER: Yes.  
 16 MR ADAMSON: Mr Laking is going to sit here for the day.  
 17 THE CHIEF CORONER: Yes.  
 18 MR ADAMSON: I hope he is not going to be called upon but he  
 19 is able to contact me if there is an issue which does  
 20 arise.  
 21 THE CHIEF CORONER: It is very tempting when somebody comes  
 22 in to ask them all the complicated questions.  
 23 MR ADAMSON: Yes, as I say, I hope he will not be called on,  
 24 perhaps not as much as he hopes that he won't be called  
 25 upon.

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1 THE CHIEF CORONER: We'll certainly take a five –minute  
 2 break.  
 3 (12.15 pm)  
 4 (A short break)  
 5 (12.22 pm)  
 6 DCI DAN BROWN (Sworn)  
 7 Examination by MR HOUGH QC  
 8 MR HOUGH: Would you please give your name and rank to the  
 9 court?  
 10 A. Yes, sir, my name is Dan Brown and I'm a Detective Chief  
 11 Inspector, currently attached to the Counter Terrorism  
 12 Command, SO15.  
 13 THE CHIEF CORONER: Officer, you may be there for some time,  
 14 so if you want to sit at any point, or stand, please  
 15 feel free.  
 16 A. Thank you, sir.  
 17 MR HOUGH: Mr Brown, you understand that I ask questions  
 18 first on behalf of the Coroner and then after me you  
 19 will be asked questions by some other lawyers.  
 20 A. Yes.  
 21 Q. Is this right, that you are Deputy SIO of  
 22 Operation Classific, the investigation into the  
 23 Westminster Terror Attack?  
 24 A. That's correct, sir.  
 25 Q. We understand that the investigation has carried out

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1 very extensive inquiries into the life and background of  
 2 Khalid Masood.  
 3 A. Yes.  
 4 Q. Did that investigation have, as a purpose, to assist the  
 5 initial investigations into whether anyone else was  
 6 involved in the preparation or planning of the attack or  
 7 was aware it was to happen?  
 8 A. That's absolutely correct, yes.  
 9 Q. Did that investigation also have as a purpose to assist  
 10 the Inquests which are considering his life as part of  
 11 the background to the attack?  
 12 A. Yes.  
 13 Q. You and your colleagues have prepared a number of  
 14 reports dealing with his life and background, and you  
 15 will be giving evidence to set out what you have  
 16 collectively learned.  
 17 A. Yes.  
 18 Q. The investigation has also, I think, had as a central  
 19 purpose to examine how Masood planned, prepared for and  
 20 executed the attack. Your reports also cover that  
 21 subject.  
 22 A. Yes.  
 23 Q. And you will be giving evidence on that in this part of  
 24 the hearing as well?  
 25 A. That's correct.

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1 Q. May we begin, then, with Masood's life history, starting  
 2 with his early life and education, and I'm looking at  
 3 section 2 of your report, beginning in 2.1.  
 4 A. Yes. Masood was born Hainault Maternity Hospital in  
 5 Erith in Kent on 25 December 1964, and he was born with  
 6 the name Adrian Russell Elms.  
 7 Q. Pause there. I think his mother is now named  
 8 Janet Ajao?  
 9 A. That's correct.  
 10 Q. And that he in his early years was known either as  
 11 Adrian Elms or Adrian Ajao?  
 12 A. Yes.  
 13 Q. Is this right, that he began using the name Masood,  
 14 Khalid Masood, around 2004, but even then used the other  
 15 names on occasion for a short time?  
 16 A. That's correct.  
 17 Q. And that he changed his name to Masood formally  
 18 in May 2005?  
 19 A. That's correct, yes.  
 20 Q. I'll refer to him as "Masood" throughout for simplicity.  
 21 Taking early years shortly, is it right that from early  
 22 in his life Masood's mother began a relationship with  
 23 a man who was to become his stepfather and whose  
 24 surname, Ajao, she took?  
 25 A. That's correct, yes, and I think he referred to him as

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1 "Dad" throughout his life.  
 2 Q. Is it also right that Masood has two stepbrothers who  
 3 are now successful people with no record of criminal  
 4 behaviour?  
 5 A. That's true.  
 6 Q. Did Masood initially attend secondary school in  
 7 Lewisham?  
 8 A. Yes.  
 9 Q. And then at the age of 13, did his family move to  
 10 Tunbridge Wells, requiring him to change schools?  
 11 A. That's correct, yes. His mother initially tried to get  
 12 him into one of the local grammar schools, however, her  
 13 efforts were unsuccessful and Masood ultimately attended  
 14 Huntley Boys' Comprehensive School.  
 15 Q. When did Masood first come to the notice of the police?  
 16 A. When he was 14 years of age he was arrested for  
 17 shoplifting and given a police caution. That wasn't on  
 18 the Police National Computer record, but that's from  
 19 information provided to us by his mother.  
 20 Q. Looking at paragraph 2.10 of your report, what were, in  
 21 short, the recollections of Masood in his school years  
 22 which his mother and brother gave you?  
 23 A. His mother suggested that he exhibited normal boisterous  
 24 behaviour, however, his two brothers suggested that  
 25 Masood was a violent but clever person who wouldn't back

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1 down from a disagreement.  
 2 Q. Did Masood leave school at 16?  
 3 A. He did.  
 4 Q. From there where did his studies take him?  
 5 A. He attended Tunbridge College of Further Education where  
 6 he studied a BTEC course in business studies.  
 7 Q. While there and during his later teenage years, what did  
 8 you learn about his character and behaviour?  
 9 A. We've been told that he would go out locally to pubs and  
 10 clubs, and his mother believes that Masood would go  
 11 looking for a fight after drinking. She also described  
 12 him as being an angry person.  
 13 Q. You recall also in your report that she went as far as  
 14 saying that she was worried that he would kill someone  
 15 through fighting?  
 16 A. That's correct, yes, that's what she told us.  
 17 Q. Turning then to his early employment, and his life in  
 18 the 1980s and 1990s, after the BTEC course, which  
 19 I think was from age 16 to 18, did Masood take up  
 20 employment on a trainee manager course?  
 21 A. Yes, with Woolworths. In the first year he was based at  
 22 a store in Tunbridge Wells. In the second year, he was  
 23 placed in the Hastings store, where he lived away from  
 24 the family home.  
 25 Q. What was his first significant trouble with the police

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1 during this period?  
 2 A. On 16 October 1983 he was arrested for criminal damage  
 3 under the name Adrian Ajao when he was 18 years old, and  
 4 he provided the police with his family address as his  
 5 home address. This was criminal damage where he was  
 6 found guilty at court and he was fined £15, plus £105  
 7 compensation.  
 8 Q. Can we bring up {DC7437/12}. We can see a record from  
 9 the Police National Computer with, at the top of this  
 10 page, that offence recorded on it.  
 11 A. That's correct, yes.  
 12 Q. We can take that down now.  
 13 Where did Masood spend the third year of what  
 14 I think was a three-year manager trainee course at  
 15 Woolworths?  
 16 A. His mother believed that it was either in Margate or  
 17 Ramsgate, and he purchased a flat nearby, but she does  
 18 not recall the address of the flat.  
 19 Q. Did he leave Woolworths?  
 20 A. He did. Apparently he walked out of his job at  
 21 Woolworths following a row with the area manager.  
 22 Q. When was the next incident of him being in trouble with  
 23 the police?  
 24 A. On 22 August 1998 he was arrested in possession of  
 25 an offensive weapon and for threatening behaviour.

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1 Q. Could you bring up that last document again {DC7437/12}.  
 2 We see that there possession of an offensive weapon, and  
 3 using threatening, et cetera, words to cause fear or  
 4 provocation of violence?  
 5 A. I should say some of these early records, we don't know  
 6 the details because the records are no longer held.  
 7 THE CHIEF CORONER: No, and I think they would probably be  
 8 spent too, so if there were records they may well have  
 9 been destroyed since then in any event.  
 10 A. In those days they would probably have been on  
 11 microfiche.  
 12 Q. Did Masood later find employment with a company called  
 13 Alcatel?  
 14 A. He did, that's right, yes.  
 15 Q. Thereafter, when was his next incident of trouble with  
 16 the police?  
 17 A. 21 April 1999, he was arrested for assault occasioning  
 18 actual bodily harm. This related to a dispute on a bus  
 19 where he allegedly struck and injured a person in the  
 20 face, causing injury.  
 21 Q. I think you obtained the Kent Police records or  
 22 information about Kent Police records recording that?  
 23 A. That's right.  
 24 Q. Is it right, though, that that case was withdrawn and  
 25 didn't go to trial?

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1 A. That's correct, that's cited as a non-conviction.  
 2 Q. Was there a further incident of trouble with the police  
 3 in 1990?  
 4 A. That's correct, yes. He was arrested inside a  
 5 restaurant in Tunbridge Wells after he pulled a  
 6 telephone from its mounting on the wall. He then  
 7 proceeded to strike officers with his feet during his  
 8 arrest and kicked the window of a vehicle, causing  
 9 damage to it.  
 10 Q. Once again I think you saw that, you found that on the  
 11 Police National Computer record that we looked at a few  
 12 moments ago?  
 13 A. That's correct, yes.  
 14 Q. At this time, so around 1990, did Masood also begin his  
 15 first serious relationship?  
 16 A. He did, yes. He started lodging at an address in  
 17 Tunbridge Wells and shortly after moving in, he began  
 18 a relationship with the lady that owned the house,  
 19 a lady called Jane Harvey.  
 20 Q. Did he go on to have two children with Ms Harvey in 1992  
 21 and 1998?  
 22 A. He did, yes.  
 23 Q. And these are his two adult children that we'll refer to  
 24 from time to time?  
 25 A. Yes.

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1 Q. Early in their relationship was there a short period of  
2 separation?

3 A. Yes. They separated briefly for a period of about three  
4 months after he hurt her in an incident.

5 Q. What was the description that Ms Harvey gave to you, in  
6 summary form, of Masood's character and behaviour?

7 A. She described him as intelligent, powerful and  
8 persuasive with a charming personality, however also  
9 that he would regularly go out drinking and call for  
10 Jane's help when he would return home drunk.

11 Q. So during this period of the early 1990s when Masood was  
12 in his late 20s, what description or account did his  
13 mother give of him?

14 A. Sorry, sir, can you -- which passage are you referring  
15 to?

16 Q. So I'm looking at paragraph 2.22 of your report, the  
17 second half.

18 A. Sorry, yes. His mother recalls that whilst Masood was  
19 living with Jane Harvey he would regularly go out  
20 drinking and that Jane would call her for help on  
21 occasion when he returned home drunk.

22 Q. Apologies, yes. From 1994 to 1997, so in his early 30s,  
23 did Masood take another academic course?

24 A. That's correct, yes, at Falmer University in Brighton,  
25 he did a three-year economics degree.

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1 Q. And I think he graduated with a 2:1?

2 A. He received a 2:1, that's correct, yes.

3 Q. Did you receive information from other students on that  
4 course about what sort of person he was?

5 A. Yes, fellow students described him as being a "ladies'  
6 man" and said that Masood looked like he could "handle  
7 himself", those words.

8 Q. After that degree, what career path did he follow?

9 A. He applied for a number of jobs but due to his criminal  
10 record struggled to get work in the financial services  
11 industry, which is where he really wanted to work, so  
12 eventually he began working with Jane Harvey at her  
13 company which supplied cleaning products, and worked  
14 there until about 2000.

15 Q. Now, I think from after that degree course, from the  
16 late 1990s, so in his early to mid-30s, we have a number  
17 of incidents of violence recorded in relation to Masood.

18 A. Yes.

19 Q. And I think you received details of those initially, at  
20 any rate, from a Criminal Records Bureau check carried  
21 out for a company for which Masood applied for work in  
22 2009; is that right?

23 A. That's correct, yes. So following that check, Sussex  
24 Police wrote a comment that said:  
25 "Khalid Masood seems to have a violent temper which

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1 he has demonstrated in a number of crimes between 1998  
2 and 2003 with the crimes becoming progressively more  
3 serious."

4 Q. And looking at paragraph 2.28 of your report, did that  
5 refer to an incident in August 1998?

6 A. It did, yes. In the incident he allegedly approached  
7 a woman, he had an altercation with the woman who he  
8 approached, and told her that she did not like him  
9 because he was black. She replied it was his attitude,  
10 not his colour she disliked, and Masood is alleged to  
11 have spat at her and punched her in the nose causing  
12 swelling, bleeding and a headache. There is no record  
13 in his arrest history of this incident.

14 Q. Moving on, then, to the period from the year 2000  
15 onwards, so we're now into Masood's mid to late 30s, was  
16 there a serious incident in July 2000, or in the course  
17 of 2000, for which Masood was prosecuted?

18 A. Yes, he was prosecuted in July 2000 following  
19 an incident where -- for wounding, which took place in  
20 the pub car park at the Crown and Thistle pub at  
21 Northiam. The victim in that was Mr Piers Mott, who is  
22 now deceased. He was approached by Masood who spat at  
23 him and then used a flick knife to injure the victim's  
24 face. Mr Mott's widow said that during the row her  
25 husband was defending someone who was working for him,

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1 and that account is supported by another witness.  
2 Masood received two years in prison for that offence.

3 Q. Your team, I think, took statements about this event.

4 A. Yes.

5 Q. And is this right: the background facts were that Masood  
6 had been in the pub and had appeared drunk?

7 A. Yes.

8 Q. That he had started abusing a man in the pub and spat in  
9 the man's face?

10 A. Yes.

11 Q. That he'd then been ejected from the pub, at which point  
12 he had attacked one of the people taking him out using  
13 a knife?

14 A. Correct, yes.

15 Q. You have said that Masood was prosecuted for that  
16 offence. He was, I think, convicted.

17 A. Correct.

18 Q. And received a sentence of two years?

19 A. Yes.

20 Q. Did he then serve a period in prison?

21 A. He did, from July 2000 to July 2001, he spent in prison.

22 Q. And during that period of imprisonment, I think he was  
23 successively in HMP Lewes, HMP Wayland and HMP Ford?

24 A. He was.

25 Q. He used, I think, the name Adrian Elms for that period

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1 of imprisonment?  
 2 A. Yes.  
 3 Q. What did the prison records say about his religion, if  
 4 anything?  
 5 A. He had no religion recorded.  
 6 Q. Did your team take evidence about Masood's period in  
 7 prison from those who knew him and Ms Harvey at the  
 8 time?  
 9 A. Yes, we did.  
 10 Q. What was the outcome of that?  
 11 A. Are you referring to 2.31, sorry?  
 12 Q. Yes, I am.  
 13 A. So the witness told us that his partner, Jane Harvey,  
 14 distanced herself from Masood after this incident, and  
 15 was told that Masood, whilst in prison, began reading  
 16 the Koran. The witness actually told us that he had  
 17 been fully radicalised in prison, however, clarification  
 18 was sought on that point and we believe actually he was  
 19 converted to the Islamic faith whilst in prison at that  
 20 time.  
 21 Q. So just further details: you took a statement from  
 22 a friend of Ms Harvey's, who knew her and through her  
 23 Masood, and she told you that Masood had been reading  
 24 the Koran in prison and had taken up Islam, practising  
 25 all elements of the faith quickly?

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1 A. That's correct.  
 2 Q. You say that it was first recorded in the statement that  
 3 she had described him as being "fully radicalised", but  
 4 then you asked for clarification, and she meant simply  
 5 that he was practising the religion very fully rather  
 6 than --  
 7 A. That's correct.  
 8 Q. -- that he had taken any extremist views at that stage?  
 9 A. Yes.  
 10 Q. Now, are you aware what Masood himself later told others  
 11 about his introduction to Islam at this time?  
 12 A. There is a document that we discovered later in the  
 13 investigation that clarified the point that he had  
 14 converted to Islam whilst -- during his first period of  
 15 custody, however, hadn't taken it seriously, and it  
 16 wasn't until his second period in custody that he had  
 17 begun to take the faith more seriously.  
 18 Q. Any evidence you're aware of that he had formed  
 19 extremist views at this stage?  
 20 A. From all the inquiries with the Prison Service, no,  
 21 there has been no evidence to suggest he had formed  
 22 extremist views whilst in prison.  
 23 Q. At around the time of Masood's first period in prison,  
 24 did his relationship with Ms Harvey come to an end?  
 25 A. It did, yes. Jane decided to separate from him due to

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1 his violent nature and ongoing domestic abuse.  
 2 Q. Where did he then go to live?  
 3 A. He moved to Eastbourne.  
 4 Q. While there, without naming any individuals, was he in  
 5 further trouble with the police?  
 6 A. Yes, he was charged with an offence of actual bodily  
 7 harm to a girlfriend.  
 8 Q. So that was to a short-term girlfriend, I think?  
 9 A. Yes.  
 10 Q. I think he was also, according to the file, charged with  
 11 intimidation of the complainant?  
 12 A. Yes.  
 13 Q. Those led to a fine and a community penalty?  
 14 A. That's correct, yes.  
 15 Q. Then in September 2002, was there another serious  
 16 incident of violence?  
 17 A. Yes. So the CRB record provided by Sussex Police  
 18 identified in September 2002 that Masood and another man  
 19 aged 31 were alleged to have approached a 28-year-old  
 20 man in licensed premises. They approached the man from  
 21 behind and hit him over the head with a glass, causing  
 22 severe lacerations to the back of his head. They then  
 23 approached a 24-year-old man at the same venue and cut  
 24 his face with a knife causing lacerations to his face  
 25 and elbow.

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1 Q. And I think you obtained the Sussex Police file for this  
 2 incident?  
 3 A. Yes.  
 4 Q. And that reveals, is this right, that Masood was  
 5 originally arrested but that the case wasn't pressed  
 6 after witnesses failed to assist or became less certain  
 7 of their evidence?  
 8 A. That's correct.  
 9 Q. Is it also right that that file referred to the  
 10 investigating officer suspecting intimidation of  
 11 witnesses?  
 12 A. Yes.  
 13 Q. Also, by reference to the CRB check that we've heard  
 14 described, was there an incident in 2003, I think, or  
 15 2002, relating to a robbery?  
 16 A. That's correct, yes. The victim claimed that Masood hit  
 17 him with a cosh, and according to the report Masood was  
 18 arrested and bailed so that advice could be sought from  
 19 the Crown Prosecution Service. However, there is no  
 20 trace on the Police National Computer record of this  
 21 offence.  
 22 Q. Was there then in March 2003 another incident using  
 23 a weapon?  
 24 A. There was, yes. It's alleged that Masood pushed a man  
 25 to the ground and then used the baton to hit him around

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1 the head and body, dislocating his shoulder, fracturing  
 2 his collar bone and causing bruising to his head and  
 3 body.  
 4 Q. Once again, you obtained the Sussex Police file for that  
 5 incident?  
 6 A. That's correct.  
 7 Q. I don't think there was any record of any conviction?  
 8 A. No.  
 9 Q. So up to this point, mid-2003, is it fair to say  
 10 a number of incidents of significant violence?  
 11 A. Yes.  
 12 Q. Escalating in seriousness?  
 13 A. I would say so, yes.  
 14 Q. And apparently becoming more regular?  
 15 A. Yes.  
 16 Q. Then in May 2003, was there a very serious and  
 17 potentially the most serious incident?  
 18 A. Absolutely, yes. He met a man called Daniel Smith who  
 19 suggested that Masood was an undercover police officer.  
 20 Masood drove him to an address in Eastbourne to prove  
 21 that he wasn't an undercover police officer. Masood  
 22 went up the driveway to a friend's house and  
 23 Daniel Smith got out of the car and made his way up the  
 24 driveway behind Masood. Smith states that Masood went  
 25 into the address and came back with a carving knife. On

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1 his return to the front door, Masood shouted "Want me to  
 2 prove to you I'm not old bill?" Masood then lunged  
 3 towards him, plunging the knife through Mr Smith's nose,  
 4 sending the blade straight through the palate of Smith's  
 5 mouth, through his tongue and into his jaw.  
 6 Q. So the attack on that occasion was using a knife?  
 7 A. Correct.  
 8 Q. And it was with such force that the knife went through  
 9 Smith's nose, through the palate of his mouth, through  
 10 his tongue and his jawbone?  
 11 A. Yes.  
 12 Q. And I think that the knife was then forced into the  
 13 jawbone with such force that the last inch broke off?  
 14 A. That's correct.  
 15 Q. I think, in fact, you've seen photographs of --  
 16 A. Yes.  
 17 Q. -- the injuries. A truly horrific --  
 18 A. Horrific, yes.  
 19 Q. -- injury.  
 20 Then I think Smith managed to get away?  
 21 A. He did, yes.  
 22 Q. He ran through the streets with Masood in pursuit?  
 23 A. That's right. Masood was heard shouting "I'm going to  
 24 kill you, you're fucking dead, I know where you live".  
 25 Q. Was action taken against Masood by the police following

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1 that incident?  
 2 A. Yes, Masood was quickly arrested. He was charged for  
 3 an attempted murder, wounding with intent, and having  
 4 a bladed weapon in a public place.  
 5 Q. Will you bring up {DC7415/12}.  
 6 A. He was also charged with possession of an offensive  
 7 weapon that was found in his vehicle when he was  
 8 arrested.  
 9 Q. We see here the indictment: attempted murder, wounding  
 10 with intent. Next page, please: having a bladed article  
 11 and having an offensive weapon. What defence, if any,  
 12 did Masood advance?  
 13 A. I believe he provided the defence of self-defence.  
 14 Q. What was the result of the trial?  
 15 A. He was found not guilty of all offences other than the  
 16 possession of the offensive weapon, ie the weapon found  
 17 in his vehicle.  
 18 Q. He was, I think, sentenced as a result to six months'  
 19 imprisonment?  
 20 A. That's correct. He had been on remand for that offence.  
 21 Q. So we can take that document down. You tell us he had  
 22 been on remand. I think that was from May  
 23 to December 2003.  
 24 A. Correct.  
 25 Q. Was he then released after trial, based on time served?

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1 A. Yes.  
 2 Q. Was that period in remand spent in HMP Lewes?  
 3 A. It was, that's correct, yes.  
 4 Q. So although acquitted on most of the charges, is it your  
 5 understanding that Masood accepted the fact of the  
 6 injury that he had inflicted?  
 7 A. Yes, he did.  
 8 Q. Now, we'll return to his time in prisons, but in brief,  
 9 do you have a summary of his religious conduct while in  
 10 prison from May to December 2003, the second occasion?  
 11 A. So when he left prison on the second occasion, the  
 12 records show that he had shown his religion as Muslim.  
 13 Q. I think you obtained evidence from others in the prison  
 14 that he resumed his interest and practise of Islam while  
 15 in prison?  
 16 A. That's correct, yes.  
 17 Q. Again, are you aware of any evidence that he formed or  
 18 expressed extremist view while there on this occasion?  
 19 A. There's no evidence to suggest that, no.  
 20 Q. Moving, then, to his period after that time in prison.  
 21 After leaving HMP Lewes at the end of 2003, I think you  
 22 have some evidence that he went to work in Saudi Arabia;  
 23 is that right?  
 24 A. That's from witness testimony, yes. We have no records,  
 25 formal records of that, but we do believe that he did go

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1 there.  
 2 Q. And as far as you're aware, was that and all other  
 3 instances of him working in Saudi Arabia teaching  
 4 English as a foreign language?  
 5 A. Yes, that's correct.  
 6 Q. As you've said, you're not absolutely certain that he  
 7 went on that occasion or for how long?  
 8 A. No.  
 9 Q. In 2004, I think he completed a course in teaching  
 10 English as a foreign language in Crawley?  
 11 A. Yes.  
 12 Q. You can bring that up on the screen, {WS0884/22}. We  
 13 can see there the certificate that he obtained on that  
 14 occasion. So we know that at that time he was gaining  
 15 a qualification in teaching English as a foreign  
 16 language?  
 17 A. That's correct.  
 18 Q. You can bring that down now.  
 19 From mid to late 2004, was Masood then living in the  
 20 Crawley area?  
 21 A. He was, yes.  
 22 Q. And I think that you interviewed somebody, a woman who  
 23 had an interest in conversion to Islam, and who was  
 24 directed to Masood in Crawley at that time?  
 25 A. That's right, yes.

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1 Q. She thereafter, I think, became friendly with another  
 2 young woman, called Farzana Malik or Isaq?  
 3 A. Yes.  
 4 Q. And Ms Malik had been born into a Muslim family but  
 5 wasn't practising?  
 6 A. That's correct, yes.  
 7 Q. So while Masood was living in the Crawley area, and we  
 8 will hear more evidence about his time in Crawley, was  
 9 he introduced to Farzana Malik?  
 10 A. That's right, yes.  
 11 Q. How did their relationship develop?  
 12 A. Ultimately he married her, but he told her that he was  
 13 interested in looking to marry, and expressed  
 14 an interest in marrying her, and she recalls it being  
 15 a matter of weeks before the meeting actually Masood  
 16 married her.  
 17 Q. He got out of prison, he moved to the Crawley area,  
 18 later in 2004 he came into contact with Farzana Malik,  
 19 and shortly after meeting her, they decided to marry?  
 20 A. That's correct, yes, in September 2004.  
 21 Q. Was the marriage a successful one?  
 22 A. It wasn't, no. No. It was described as an utter  
 23 disaster by Farzana Malik.  
 24 Q. Did the failure of the marriage become apparent from the  
 25 honeymoon onwards?

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1 A. It did, that's right, yes.  
 2 Q. What was her account of the reasons for the disaster in  
 3 the relationship?  
 4 A. I think they argued about things like what she watched  
 5 on TV. Masood wanted her to stay away from what he  
 6 called "trash". He would take the TV aerial away,  
 7 et cetera. And also she said that Masood didn't want  
 8 her around people who were non-Muslims. She got the  
 9 sense that he was very insecure and that he was  
 10 constantly reassuring himself.  
 11 Q. But did she also give evidence about him having  
 12 good-natured conversations with Christian priests who  
 13 came to the house?  
 14 A. This is true, yes.  
 15 Q. Yes. What did Farzana tell you Masood had told her  
 16 about his time in prison?  
 17 A. He told her that he'd been in prison in relation to  
 18 drugs, and that he had converted to Islam whilst he was  
 19 in prison. He explained that there were people going  
 20 around trying to talk to prisoners about religion, and  
 21 Masood had said that there was a Muslim, similar to a --  
 22 I suspect someone similar to an imam. Masood told her  
 23 that to begin with he told the man to, in his words "eff  
 24 off" as he didn't want to talk to him. However, Masood  
 25 then said that the person would regularly visit him. On

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1 one occasion Masood, for his own amusement, decided to  
 2 speak to him. He told Masood that he could change his  
 3 life and according to Masood he imparted some knowledge  
 4 that Masood said made sense. And it was at that point  
 5 that he decided to do something about his life so he  
 6 started reading the Koran.  
 7 Q. Looking at your paragraph 2.44, what did he say to her  
 8 about the time of his conversion, when specifically he  
 9 had found Islam?  
 10 A. He told her that he had converted four years before she  
 11 met him.  
 12 Q. So that would be the first prison term?  
 13 A. That's correct, yes.  
 14 Q. Did she have any doubts about that?  
 15 A. Well, she did because she knew that he'd used a knife  
 16 subsequently to converting, which would obviously be  
 17 against the Muslim religion, as she understood it.  
 18 Q. And did you also receive an account from Masood's mother  
 19 about when and how he had converted?  
 20 A. Sorry, sir, is that 2.44?  
 21 Q. I'm looking at the bottom of your paragraph 2.44.  
 22 A. Yes, that's right. Masood's mother gave an account that  
 23 Masood, having told her he converted to Islam in prison  
 24 after being introduced to the faith by a fellow inmate,  
 25 and after then reading the religious texts.

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1 Q. How and when did Masood's marriage with Farzana come to  
2 an end?  
3 A. It came to an end after several months of marriage. She  
4 then moved to a different part of the country in early  
5 2005.  
6 Q. Did he make any effort to re-establish a relationship?  
7 A. He did. He sent her some texts, some which she  
8 describes as finding unpleasant, and a little later he  
9 came to the location she had moved to, but she did not  
10 want to see him. I think he shouted through her  
11 letterbox but he didn't do any more than that.  
12 Q. So the marriage to Fasana ended in early 2005.  
13 In March 2005, do you have your first documentary record  
14 of Masood going to work in Saudi Arabia teaching  
15 English?  
16 A. We do, yes. There's an entry stamped on 3 March 2005 at  
17 King Abdul Aziz International Airport in Saudi Arabia.  
18 There is also an exit stamp on 8 March, suggesting  
19 a short visit.  
20 Q. So a short visit perhaps, what, for a job interview, or  
21 to make arrangements for a longer stay?  
22 A. Probably, yes.  
23 Q. In May 2005, I think Masood changed his name by deed  
24 poll to Khalid Masood?  
25 A. That's correct.

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1 Q. We can see that at {WS0884/18}. His change of name  
2 declaration dated 20 May 2005?  
3 A. Yes.  
4 Q. You can take that off the screen now.  
5 Did Masood from late 2005 then go to Saudi Arabia  
6 for a longer period of time to work?  
7 A. Yes, between November 2005 and November 2006, we found  
8 a letter in his personal documents which certifies he  
9 was employed by Educational Projects and Information  
10 Technology Limited in Saudi Arabia, where he completed  
11 a year's contract.  
12 Q. So a legitimate company --  
13 A. Yes.  
14 Q. -- for which he was teaching English? We have, I think,  
15 his CV which you later recovered from his property and  
16 from a job application, {WS1656/8}, so this was his CV,  
17 and if we go to the next page, {WS1656/9}, do we see  
18 that he recorded in the middle of the  
19 page, November 2005 to November 2006, an English teacher  
20 in Saudi Arabia, performing, teaching English as  
21 a foreign language duties, the same as later jobs he  
22 did?  
23 A. Yes.  
24 Q. We can take that off screen for the moment.  
25 During this period, looking at paragraph 2.49 of

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1 your report, was there a notable incident?  
2 A. 2.50, are you talking about --  
3 Q. I'm sorry, yes.  
4 A. -- regarding his eldest daughter?  
5 Q. Yes.  
6 A. Yes, there was an incident, he was in Saudi Arabia, it  
7 was the last day of school before the Christmas  
8 holidays, which suggests it was in December. His  
9 daughter had been crossing the road to catch the school  
10 bus when she was struck by a van from the side which  
11 flung her up in the air. This resulted in her going  
12 into coma and sustaining a bleed on the brain. Her  
13 mother rang Masood to let him know what had happened.  
14 Masood said not to worry, everything was going to be  
15 fine as he was at the Hajj, which is the Muslim  
16 pilgrimage, and at the time he was going to pray.  
17 THE CHIEF CORONER: Would that be a convenient moment to  
18 break?  
19 MR HOUGH: Just one or two final points in relation to that,  
20 very quickly.  
21 THE CHIEF CORONER: Yes, of course.  
22 MR HOUGH: So his eldest daughter with Ms Harvey had been  
23 injured in a car accident, badly?  
24 A. Yes.  
25 Q. He was told, and at the time he was on the Hajj, the

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1 major pilgrimage in Mecca, and said he would pray?  
2 A. Yes.  
3 Q. His daughter recovered?  
4 A. Yes.  
5 Q. And is this right, he later described her recovery as  
6 one of his proofs of the truth of Islam?  
7 A. That's right, that's what he told a witness, yes. There  
8 were two miracles that he said he had experienced in his  
9 life and the other was in relation to being acquitted  
10 for the offence of attempted murder.  
11 MR HOUGH: Thank you very much. That would be a convenient  
12 moment.  
13 THE CHIEF CORONER: Thank you very much.  
14 Mr Keith?  
15 MR KEITH: Sir, may I mention something. I hope you won't  
16 think it discourteous if I absent myself to attend to  
17 some other professional obligations elsewhere. The  
18 Metropolitan Police Service will be left in the more  
19 than capable hands of Mr Butt.  
20 THE CHIEF CORONER: Thank you.  
21 (1.00 pm)  
22 (The Luncheon Adjournment)  
23 (2.05 pm)  
24 MR HOUGH: Mr Brown, when we broke for lunch you had just  
25 told us of two miracles, as Masood saw them, which he

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1 later described as having convinced him of the truth of  
 2 Islam: first of all, his daughter in late 2005 —  
 3 A. Yes.  
 4 Q. — recovering from a bad car accident.  
 5 A. That's correct.  
 6 Q. And, secondly, his own acquittal following the stabbing  
 7 of Mr Smith?  
 8 A. That's correct, yes.  
 9 Q. May we now move on to 2006. You have told us that  
 10 Masood was working in Saudi Arabia from late 2005 to  
 11 late 2006. In the latter part of 2006, I think Masood  
 12 came into contact with Rohey Hydara, a woman he was  
 13 later to marry?  
 14 A. That's right, yes.  
 15 Q. And is this right, that after he returned to the UK in  
 16 late 2006, they met and quite soon after they married?  
 17 A. Yes, on the second meeting he actually asked for her  
 18 hand in marriage, which she accepted.  
 19 Q. Where did they initially live after marrying?  
 20 A. Having had a small wedding in Ilford, they lived in  
 21 Luton together.  
 22 Q. Now, according to his CV, I think shortly after getting  
 23 married to Rohey, he returned to Saudi Arabia for  
 24 a further job during 2007?  
 25 A. Yes, March 2007 until October 2007.

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1 Q. We can see that on the CV again, {WS1656/9}. March  
 2 to October 2007, again, working as a teacher, teaching  
 3 English as a foreign language in an industrial academy  
 4 in Jubail?  
 5 A. That's right, yes.  
 6 Q. I think verified that by reference to a visa in his  
 7 passport?  
 8 A. That's right, yes, it was issued on 19 December 2005 and  
 9 expired on 28 November 2007.  
 10 Q. You also took an account from a fellow teacher who knew  
 11 Masood at that time in Saudi Arabia, somebody called  
 12 Yoseff Ahmed?  
 13 A. That's right, yes, and he recalled that Masood showed no  
 14 signs of extreme views and got on well with people of  
 15 a variety of faiths, he said in his statement.  
 16 Q. Towards the end of 2007 when Masood returned to the UK,  
 17 where did he and Rohey then go to live?  
 18 A. They lived in Chadwell Heath.  
 19 Q. Were there any significant recollections that Rohey had  
 20 of their time there?  
 21 A. There is a recollection of him meeting a friend in  
 22 a park.  
 23 Q. And that was somebody he apparently told Rohey was  
 24 wearing a tag, I think, in relation to a terrorism  
 25 offence?

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1 A. That's correct.  
 2 Q. And is it right that Masood wouldn't take his mobile  
 3 phone when meeting that man?  
 4 A. That's correct, yes.  
 5 Q. Then after some time in Chadwell Heath did Masood return  
 6 to Saudi Arabia for another period, as we see on the CV  
 7 on the screen?  
 8 A. Yes, again from April 2008 until April 2009, again,  
 9 teaching English as a foreign language at the General  
 10 Authority of Civil Aviation.  
 11 Q. If we look at {WS0884/67}, do we see here you were able  
 12 to obtain in your inquiries his offer of employment for  
 13 that post?  
 14 A. Yes, that's correct.  
 15 Q. And {WS0884/31}, his work visa application for that  
 16 post?  
 17 A. Yes.  
 18 Q. And your team went on to verify his work there again?  
 19 A. Yes, that's correct.  
 20 Q. You can take that off the screen.  
 21 After his return to the UK in April 2009, where did  
 22 Masood live with his family?  
 23 A. He lived in Luton.  
 24 Q. What was he doing there?  
 25 A. He worked for a company called ELAS, which is a company

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1 that provides English language tuition to foreign  
 2 students.  
 3 Q. If we can have the CV on the screen again, {WS1656/8},  
 4 do we see here on the first page of the CV, October 2009  
 5 to June 2012, his work at ELAS identified?  
 6 A. Yes.  
 7 Q. And while there, did Masood befriended a fellow teacher?  
 8 A. He did, a man called Craig Donohoe.  
 9 Q. And what were Mr Donohoe's principal recollections of  
 10 Masood?  
 11 A. He recalled that Masood was keen to convert him to  
 12 Islam, but Masood did not seem to have any problem with  
 13 non-Muslims. He told us that Masood joined a gym and  
 14 they worked out together.  
 15 Q. We can take the CV off the screen again for the moment.  
 16 Did Rohey have anything to say about his gym use  
 17 over this period?  
 18 A. Well, she told us that at that occasion he started to  
 19 take steroids as part of his gym use, which she didn't  
 20 like him doing.  
 21 Q. We'll hear from her about what effect they had.  
 22 Were there other difficulties in the marriage at  
 23 this time?  
 24 A. Yes, again, she told us that he had anger issues, and he  
 25 would get very angry and was controlling, and that they

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1 did have periods of separation as a result of his anger  
 2 problems.  
 3 Q. Did she give you the reason for any of those periods of  
 4 separation?  
 5 A. She told us that in fact on two occasions he told her  
 6 that he was divorcing her, they use a form of words in  
 7 the Muslim faith to effect a divorce, and on one  
 8 occasion he did this because he wanted her to stop  
 9 wearing trousers and she refused.  
 10 Q. So objecting to, effectively, a westernised form of  
 11 clothing?  
 12 A. Yes.  
 13 Q. In 2010, while Masood was still in Luton, did his eldest  
 14 daughter with Ms Harvey, who was now, I think, of  
 15 university age, go to live with him?  
 16 A. That's right, yes. She actually went to university and  
 17 due to issues with student accommodation, she went to  
 18 live with him.  
 19 Q. Did Ms Harvey, Jane Harvey, tell you that Masood, she  
 20 thought influenced or exercised an influence over his  
 21 eldest daughter around that time?  
 22 A. Yes, encouraged her to become a strict Muslim. She had  
 23 converted to the Muslim faith as well.  
 24 Q. May we move on, then, to June 2012, and at that time did  
 25 the family, Masood and his family, move once again?

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1 A. Yes, they moved to Birmingham, where he set up  
 2 an English language teaching business.  
 3 Q. What was that called?  
 4 A. It was called Iqra ELS. Iqra means "learn" in Arabic  
 5 and ELS stood for "English Language Services".  
 6 Q. If we bring up the CV again, {WS1656/8} we see that he  
 7 described it as being a senior partner in his own  
 8 business, Iqra English Language Services business, and  
 9 that he was responsible for organising all aspects of  
 10 that business, providing an effective service of English  
 11 language tutoring, proof-reading, and editing up to PhD  
 12 level?  
 13 A. Yes, is that on the next page?  
 14 THE CHIEF CORONER: I think it's the page in front of you.  
 15 MR HOUGH: No, I think it is the middle of this page that we  
 16 are looking at at the moment, if yours is the same?  
 17 A. Yes, I do apologise. Yes.  
 18 Q. So if we can take that off the screen for the moment.  
 19 Now, did his colleague from the ELAS school in Luton  
 20 tell you anything about his departure from Luton?  
 21 A. Yes, he told us that he left without much notice, that  
 22 he was hoping to start a residential school in  
 23 Birmingham.  
 24 Q. When he moved to Birmingham, is this right, he continued  
 25 his avid working out at the gym?

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1 A. That's correct, yes, he joined a gym in Birmingham.  
 2 Q. And shortly after the move to Birmingham, did he and  
 3 Rohey separate for a period?  
 4 A. Yes.  
 5 Q. That was a period of, I think, around five months?  
 6 A. That's right. She returned to London while Masood  
 7 stayed in Birmingham.  
 8 Q. Is this right: during the separation, Masood used  
 9 an Islamic dating website called Pure Matrimony.  
 10 A. That's correct, yes.  
 11 Q. And is it right that he made contact with a woman and  
 12 sent her emails describing various aspects of his life?  
 13 A. Yes.  
 14 Q. Which provides some insight into his view of himself?  
 15 A. Yes, that's correct.  
 16 Q. May we have on screen {WS1662A/9}. Now, this is,  
 17 I think, a transcript of one of those emails, and do we  
 18 see on this page, in the third paragraph, that he  
 19 describes how religious he is?  
 20 A. Yes.  
 21 Q. And describes in the next paragraph doing his prayers  
 22 regularly?  
 23 A. Yes.  
 24 Q. And making observances at the mosque?  
 25 A. Yes.

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1 Q. And then in the penultimate paragraph of this page, that  
 2 he strove to live as a good Muslim?  
 3 A. That's correct, yes.  
 4 Q. And his form of dress?  
 5 A. Yes.  
 6 Q. And that he had worked in Saudi Arabia for about two  
 7 years, making the major pilgrimage to the Hajj and about  
 8 10-15 umrahs, that's minor pilgrimages?  
 9 A. Yes.  
 10 Q. Then {WS1662A/10}, please, he refers at the top of the  
 11 page to having continued his Arabic studies.  
 12 A. Yes.  
 13 Q. And then in the antepenultimate paragraph beginning:  
 14 "After implementing Islam in the home ..."  
 15 He describes it as thinking that it was his  
 16 responsibility to provide for the family.  
 17 A. Yes.  
 18 Q. But that he regarded any earnings his wife made as being  
 19 hers?  
 20 A. Yes.  
 21 Q. We can move, then, to the next page {WS1662A/11} we see  
 22 a description of his life. He says he has had two  
 23 serious relationships referring to first of all his  
 24 relationship with Ms Harvey and then with Rohey Hydera.  
 25 A. That's correct.

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1 Q. And then he says this :  
 2 "As a normal disbeliever [ this was at the time of  
 3 his relationship with Ms Harvey] I drank in pubs at the  
 4 weekend, but alcohol did not agree with me and sometimes  
 5 I got into bar fights . I have a line on my face from  
 6 a knife slash. One day a racist and I got into a pub  
 7 fight and I beat him up. I spent a year in prison  
 8 from June 2000 until June 2001. During this time, I was  
 9 introduced to Islam by a visiting imam (called Khalid!)  
 10 and I read the Koran through in English. I also split  
 11 up with my girlfriend while I was in prison."

12 Then he goes on:

13 "When I was released from prison ..."

14 He went to a mosque, as he says, and he goes on, in  
 15 summary to say that he didn't receive support from other  
 16 Muslims in the area and therefore went back to drinking  
 17 and partying.

18 A. Yes.

19 Q. And he says:

20 "In April 2003 I beat up another guy. He had come  
 21 to my home threatening me about a debt he owed me, and  
 22 I just attacked him. I went to court in December 2003,  
 23 but between April and December I was kept in prison.  
 24 During this time, I began practising Islam seriously --  
 25 5 prayers a day and lots of reading and giving Dawah in

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1 prison."

2 Then he says he was found not guilty, had moved to a  
 3 Muslim area in Crawley and began his life as a fully  
 4 practising Muslim?

5 A. Yes.

6 Q. So setting aside the slightly misleading accounts of the  
 7 episodes of violence, this is Masood's account of how  
 8 and when he converted?

9 A. That's correct, yes.

10 Q. Then we see at the bottom of the page he refers at this  
 11 time -- we think 2013 -- to him taking steroids at what  
 12 he says is a low dose?

13 A. Yes, that's correct.

14 Q. Then if we can move on to {WS1662A/16}, please, in the  
 15 bottom half of the page he responds to a question that  
 16 the woman has asked about his temper in the light of  
 17 everything he has said. He says it's nothing to worry  
 18 about because each fight he had got into in the past was  
 19 after heavy drinking in the pub.

20 A. Yes.

21 Q. That he then goes on in the final paragraph to say as to  
 22 his marriage to his Gambian ex-wife, that's a reference  
 23 to Rohey --

24 A. Yes.

25 Q. -- from whom he had separated at this time, he had got

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1 married in 2006, the marriage lasted nearly seven years,  
 2 and that they had divorced over three months ago.

3 A. That's correct.

4 Q. He goes on to explain in the following sentences why  
 5 there were problems in the relationship :

6 " Firstly , there was certain behaviour and cultural  
 7 practices which went against Islam so I would never  
 8 accept this ."

9 Then over the page {WS1662A/17}:

10 "Secondly, my advice to correct such errors was met  
 11 with arguments and often stubborn refusal to accept my  
 12 decisions ."

13 A. Yes.

14 Q. Then in the following paragraph he refers to concerns  
 15 with Rohey's behaviour, as he puts it, that she wasn't  
 16 reading the Koran in Arabic; yes?

17 A. Yes, that's correct.

18 Q. That she was having the children participate in birthday  
 19 celebrations, to which he objected?

20 A. That's right.

21 Q. And that she was, as he saw it, not wearing proper  
 22 Islamic dress in front of others in the house.

23 A. Yes.

24 Q. And then page 24, please {WS1662A/24}, and on this page  
 25 he describes his use of steroids, and once again says he

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1 appreciates that they can be harmful, but he takes the  
 2 smallest dose possible, taking rest periods from those.

3 A. Yes.

4 Q. We can take that off the screen now, please.

5 So do those extracts suggest that Masood was  
 6 presenting himself to this woman as being quite strictly  
 7 religious?

8 A. Absolutely, yes.

9 Q. But not expressing any extremist views?

10 A. Yes, that's correct.

11 Q. In the event, is this right, Masood got back together  
 12 with Rohey, and his relationship with this woman, such  
 13 as it was, came to an end?

14 A. That's correct, yes.

15 Q. Moving on from 2013 to 2014, is it right to say, looking  
 16 at your paragraph 2.63, that Masood's second daughter  
 17 with Ms Harvey, who was by this stage a teenager,  
 18 I think --

19 A. That's right, yes.

20 Q. -- came to visit him?

21 A. Yes. Often visiting Birmingham at the weekends, and  
 22 when she finished her GCSEs in 2014 she visited Masood.

23 Q. How did that visit go?

24 A. During the visit she rang her mother to tell her that  
 25 she would not be returning home and she would be going

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1 to school in Birmingham. Her mother believed she was  
 2 frightened of Masood and after a short while she  
 3 returned home and after a long chat, her mother formed  
 4 the opinion that, in her words, he effectively abducted  
 5 his daughter. The mother confronted Masood regarding  
 6 this incident and did not have any contact thereafter.  
 7 We know that according to the account of the  
 8 daughter, Masood tried to persuade her to become  
 9 a practising Muslim and to live with him. So she  
 10 decided to go home, and later chose not to return.  
 11 Q. So it would appear from those accounts together that  
 12 there was a certain amount of heavy emotional persuasion  
 13 being exercised by Masood on his second daughter to  
 14 become a Muslim.  
 15 A. Yes, that's right. This was never reported to the  
 16 police.  
 17 Q. And not only was it never reported to the police, but  
 18 she never, in fact, became a devout Muslim?  
 19 A. No, she didn't.  
 20 Q. Or a Muslim at all, I think?  
 21 A. No, that's right.  
 22 Q. Moving then on to early 2015, from this point in time,  
 23 did Masood begin making plans to return to work once  
 24 again in Saudi Arabia?  
 25 A. That's correct, yes, he did.

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1 Q. What were his reasons, or apparent reasons?  
 2 A. Because he believed that the money was good and he  
 3 expected that the employer would pay for his family to  
 4 move to Saudi Arabia with him.  
 5 Q. And you've got those from accounts given by those who  
 6 knew him?  
 7 A. Yes, that's right.  
 8 Q. And I think in February 2015 he had a vaccination which  
 9 you believe to have been linked with an application for  
 10 work?  
 11 A. Yes, a meningitis vaccination, yes, that's right.  
 12 Q. And in March 2015 did he visit Saudi Arabia for a short  
 13 time, just a few days, for a minor pilgrimage?  
 14 A. That's correct, yes, between 3 and 8 March 2015.  
 15 Q. Then later in 2015, I think Masood bought a car in  
 16 Birmingham, September 2015?  
 17 A. Yes, he did, yes.  
 18 Q. But later sold that, apparently because of plans to move  
 19 overseas?  
 20 A. That's correct.  
 21 Q. Sold to his eldest daughter, I think, in March 2016?  
 22 A. Yes.  
 23 Q. Then in May 2016, did Masood receive a job offer from  
 24 a university in Saudi Arabia?  
 25 A. Yes, from Mustafa Derbashi, a learning teaching centre

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1 at the King Abdulaziz University, offering him -- with  
 2 an initial job offer from their human resources  
 3 department.  
 4 Q. If we bring up on screen {WS0900/172}, do we see here  
 5 an email dated 2 May 2016, from an official in the -- or  
 6 an employee at the King Abdulaziz University, making  
 7 an initial job offer to Masood?  
 8 A. That's right, yes.  
 9 Q. We can take that off the screen. In the summer of 2016,  
 10 continuing the chronological story, did Mr Donohoe,  
 11 Masood's former colleague from the ELAS school, have  
 12 contact from Masood again?  
 13 A. Yes, he received text messages from him asking if he  
 14 would like to visit.  
 15 Q. And did that visit take place?  
 16 A. It did, yes.  
 17 Q. A few significant points, please, from the visit.  
 18 A. He noticed the atmosphere changed after Masood dropped  
 19 his wife off and that Masood was a lot more animated,  
 20 and he was very keen to talk about Islam and the Koran,  
 21 and he also spoke to Mr Donohoe about why he should  
 22 convert to Islam. He felt pressured in the  
 23 conversation.  
 24 Q. So during the time together there was what Mr Donohoe  
 25 felt was pretty heavy pressure to convert?

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1 A. That's correct.  
 2 Q. Did Masood also show video clips about Islam?  
 3 A. He did, yes.  
 4 Q. But, is this right, clips showing what were said to be  
 5 Koranic miracles but nothing extremist?  
 6 A. Yes, that's right, I believe they were from YouTube but  
 7 nothing extreme.  
 8 Q. Was the conversation between Masood and Mr Donohoe in  
 9 which Masood reported these two miracles that we have  
 10 referred to earlier?  
 11 A. Yes, that's correct, the two miracles we've mentioned  
 12 earlier, around the -- he described it as when he was  
 13 drug dealing and he pulled a knife on a man and had been  
 14 arrested for attempted murder. Masood told him that he  
 15 prayed and the court had found him not guilty. Then  
 16 there was the second miracle which was the incident when  
 17 his daughter had been involved in a car crash.  
 18 Q. So according to Mr Donohoe, Masood described the event  
 19 in 2003 involving the attack as associated with drug  
 20 dealing?  
 21 A. That's correct.  
 22 Q. Did Masood tell Mr Donohoe about any plans he had for  
 23 work in the future?  
 24 A. Yes, he told him that he taught English in Saudi Arabia  
 25 and he wanted to return there with his family. He said

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1 that he had been accepted there and had not experienced  
 2 any discrimination, and he described it as a Utopia.  
 3 Q. So we know by this time Masood had just received the  
 4 initial job offer?  
 5 A. That's correct, yes.  
 6 Q. Moving down to your paragraph 2.70, at this time was  
 7 Masood continuing to do freelance work through his own  
 8 business: teaching, translation and the like?  
 9 A. That's right, yes, he was helping postgraduate students  
 10 with -- a postgraduate student with his thesis and other  
 11 academic work.  
 12 Q. So one aspect of your team's work involved looking at  
 13 Masood's finances in quite a lot of detail?  
 14 A. That's correct, yes.  
 15 Q. And you discovered that he received a certain number of  
 16 payments from a particular person?  
 17 A. Yes.  
 18 Q. And I think you found that she was the wife or partner  
 19 of a postgraduate student for whom he had done quite  
 20 a lot of work?  
 21 A. That's true, yes.  
 22 Q. Is it right, then, that you found that this postgraduate  
 23 thesis was entirely genuine?  
 24 A. It was, absolutely.  
 25 Q. And the payments, therefore, for, as far as you could

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1 tell, entirely genuine and legitimate work?  
 2 A. That's right, they were entirely legitimate.  
 3 Q. Now, at the end of, or towards the end of 2016 did  
 4 Masood apply for a work visa for Saudi Arabia and go  
 5 through various documentary steps for that purpose?  
 6 A. Yes, over a 12-week period in October 2016 he made 12  
 7 calls to the Foreign and Commonwealth Office in  
 8 connection with his visa application for Saudi Arabia,  
 9 and he submitted an application to have documents  
 10 formally certified with an apostille, a requirement for  
 11 the visa. The second such application was made by  
 12 Masood to the Foreign and Commonwealth Office on  
 13 23 November 2016.  
 14 Q. So in late 2016, Masood was going through the procedural  
 15 steps to prepare for going to work in Saudi Arabia  
 16 again?  
 17 A. Yes, that's what it appears.  
 18 Q. If we go to {WS0900/198}, we see here, I think, his work  
 19 visa application to the Saudi Embassy dated in the  
 20 middle of the page 11 December 2016?  
 21 A. Yes.  
 22 Q. And then {WS0900/187}, please. Now, in the course of  
 23 this application, was it necessary for Masood to obtain  
 24 a police certificate for the purpose of the visa  
 25 application?

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1 A. Yes, that's correct. Yes. That's what we've got in  
 2 front --  
 3 Q. And we see that this was obtained and created on  
 4 15 November 2016.  
 5 A. Yes.  
 6 Q. And we see on this page, and over onto the next page,  
 7 please {WS0900/188} that it showed his various criminal  
 8 convictions?  
 9 A. Yes.  
 10 Q. Including the offences in 2000, 2002 and 2003 that you  
 11 have identified to us?  
 12 A. Yes. That's right.  
 13 Q. We can take that off the screen.  
 14 During the application process, did Masood's family,  
 15 other than him, move away from Birmingham?  
 16 A. Yes, they moved to East London.  
 17 Q. And what was the apparent reason for that move?  
 18 A. I believe this was something in relation to schooling at  
 19 the time, was the reason that was given.  
 20 Q. I think we may hear from Rohey that Masood was thinking  
 21 of travelling to Saudi Arabia to work, and that she was  
 22 reluctant to remain in Birmingham without him --  
 23 A. Yes.  
 24 Q. -- and had family where she was going?  
 25 A. That's correct as well, yes.

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1 Q. Is it also right that Rohey over this period remembered  
 2 that the application process was very costly and, to  
 3 Masood, very frustrating?  
 4 A. Yes, I believe that the process passed slower than he  
 5 anticipated, having to go through all the different  
 6 documentation, and he was concerned as well about the  
 7 impact that his criminal record would have on the  
 8 application. I believe the whole process cost almost  
 9 a thousand pounds, that she identified to us.  
 10 Q. Now, looking at your paragraph 2.75, what was the  
 11 outcome of the application?  
 12 A. His application was rejected by the Saudi Arabian  
 13 authorities. The inquiries we've conducted are only  
 14 able to tell us that they believe it may have been due  
 15 to one of two reasons: one, his criminal record, or the  
 16 fact that the paperwork was completed incorrect, however  
 17 they weren't able to give us firm clarification as some  
 18 material had been destroyed.  
 19 Q. So the reasons for the refusal aren't 100 per cent  
 20 clear, but there were -- possible reasons were  
 21 difficulties with the paperwork or his criminal record?  
 22 A. Absolutely, yes. Probably the criminal record. I'm led  
 23 to believe that the process of obtaining visas changed  
 24 at that time.  
 25 Q. So in your paragraph 2.76, you tell us, I think, the

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1 reason for Masood being rejected on this occasion but  
 2 not on previous occasions, or at least the possible  
 3 reason?  
 4 A. Yes, that's correct. His friends told us that he had  
 5 previously entered under a business visa, which strictly  
 6 does not allow people to apply for work, but it would be  
 7 common practice for people to enter. When he made his  
 8 final application in the 2015/2016 time, this was no  
 9 longer a practice that was accepted in Saudi Arabia and  
 10 therefore he would have to apply for a work visa.  
 11 Q. So Masood's plan and hope to go to work in Saudi Arabia  
 12 once again was frustrated --  
 13 A. Yes.  
 14 Q. -- towards the end of 2016?  
 15 A. That's right, yes.  
 16 Q. This is a potentially significant event.  
 17 A. That's correct, sir, yes.  
 18 Q. Moving on to early 2017, so Masood living in Birmingham,  
 19 his family in London, did Masood meet someone at  
 20 a Birmingham mosque called Ahmed El Farsi?  
 21 A. He did, yes, correct, a Moroccan man.  
 22 Q. Did Ahmed El Farsi have a house in his home country of  
 23 Morocco?  
 24 A. He did, yes. He had lived there for several years up to  
 25 2015. This provoked a conversation in which Masood

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1 expressed an interest in travelling to Morocco.  
 2 Q. I think Masood shortly afterwards bought a second-hand  
 3 car from the man?  
 4 A. That's right, yes, and they remained in contact.  
 5 Q. To be clear, the transaction and their relationship was,  
 6 I think, very thoroughly investigated by your team?  
 7 A. That's correct.  
 8 Q. And was found to be entirely innocuous?  
 9 A. That's correct, yes.  
 10 Q. But the fact of Masood meeting the man and talking about  
 11 a potential visit to Morocco is, I think, something we  
 12 will hear echoed in some of his comments to other people  
 13 over the months that followed?  
 14 A. Yes, that's right, yes. He had other conversations  
 15 about a desire to move to a Muslim country.  
 16 Q. Also in February 2017, looking at your paragraph 2.78,  
 17 did Masood ask advice from former colleagues in Saudi  
 18 Arabia about how he might get a job there?  
 19 A. Yes, that's quite correct, yes. Someone that was  
 20 already working in Saudi Arabia, called him out the blue  
 21 and advice around working in Saudi Arabia and it was  
 22 this individual that told him that checks were now  
 23 carried out on all new teachers and that Masood would  
 24 not be acceptable because of his criminal record.  
 25 Q. I think that was 23 February 2017, according to your

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1 records?  
 2 A. Yes.  
 3 Q. And by that stage, so at the end of February 2017, it  
 4 seems that Masood was still interested in going to Saudi  
 5 Arabia for work.  
 6 A. Yes.  
 7 Q. But was now being told that that might be very  
 8 difficult?  
 9 A. Yes, that's right.  
 10 Q. On 20 February 2017, so just a few days before that  
 11 conversation with the colleague, is it right that Masood  
 12 emailed his CV to a recruitment agency called Chase  
 13 Recruitment, which recruited for jobs in the  
 14 Middle East?  
 15 A. That's right, yes.  
 16 Q. We have for the lawyers' benefit a partly cut off copy  
 17 of his email at {WS1656/7}. I don't go to that.  
 18 So 20 February, he was still looking actively for  
 19 language teaching jobs in the Middle East?  
 20 A. That's correct, yes.  
 21 Q. Did Rohey, his wife, tell the investigation team about  
 22 discussing with her an alternative plan to go to  
 23 Morocco?  
 24 A. That's correct, yes. He told her about the plans to go  
 25 with Mr El Farsi to look for work because Mr El Farsi

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1 seemed confident that Masood could obtain work there as  
 2 an English teacher.  
 3 Q. That's what Masood told his wife?  
 4 A. Yes.  
 5 Q. Not necessarily what Mr El Farsi told Masood?  
 6 A. No.  
 7 Q. And then on 7 March 2017, I think you recovered,  
 8 identified a text, sent from Masood to Mr El Farsi,  
 9 asking if they could go to Morocco on 26 March.  
 10 A. That's correct, yes.  
 11 Q. But Mr El Farsi told police that he had no firm plans to  
 12 go to Morocco with Masood.  
 13 A. This is true, yes.  
 14 Q. Now, also on 7 March, is it right to say that he sent  
 15 an email to his mother?  
 16 A. This is true, yes.  
 17 Q. We can bring that up, {DC7514/1}. This is an email from  
 18 Masood to his mother on 7 March in the evening. He  
 19 refers to his wife and family staying with his wife's  
 20 mother in London temporarily, referring, as you told us,  
 21 to the fact that the schooling wasn't good --  
 22 A. Yes.  
 23 Q. -- that the education system was thought to be better in  
 24 London. Then he says in the second paragraph:  
 25 "I have been offered a business opportunity in

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1 Morocco as well as the probability of teaching work out  
 2 there. We might decide to migrate there and make it our  
 3 new home. I have planned to travel to Morocco soon in  
 4 order to check things out — I may go within the next 2  
 5 weeks. Therefore I was hoping to come alone to visit  
 6 you and dad before I leave. Is it okay if I come to you  
 7 on Thursday 16th March?"

8 A. Yes.

9 Q. So he was telling his mother that he had received  
 10 a business opportunity in Morocco as well as the  
 11 probability of teaching work out there. As far as  
 12 you're aware, was that correct or incorrect?

13 A. That was correct. That's what his mother believed.

14 Q. That's what his mother believed, but as far as you're  
 15 aware, I think there was no — you didn't receive any  
 16 firm information that he had received any sort of job  
 17 offer?

18 A. No, that's right. The only conversation he had about  
 19 Morocco was with El Farsi, according to the information  
 20 that we've been provided since.

21 Q. Based on the account of Mr El Farsi, that didn't involve  
 22 any firm business plans at all, did it?

23 A. No.

24 Q. And then he identified a number of Islamic websites,  
 25 which he was suggesting his mother visit?

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1 A. Yes.

2 Q. If we can take that down, please.

3 In addition to all its other work, your team,  
 4 I think, has investigated Masood's finances as they  
 5 stood in the months before his death?

6 A. Yes.

7 Q. And for the benefit of lawyers, I don't bring it up, the  
 8 report is at {DC7545/1}.

9 What did you conclude about the state of his  
 10 finances generally?

11 A. Just bear with me, sir, while I find it in my ...  
 12 So Masood held an Islamic current account, savings  
 13 account, business account and a credit card. They were  
 14 all overdrawn and over their authorised overdraft limit,  
 15 and prior to Masood's death, he had returned direct  
 16 debits for several organisations. It's clear from his  
 17 financial records that he was struggling with money and  
 18 was in debt at the time of his death.

19 Q. So in debt with loans and credit card debts outstanding?

20 A. Yes.

21 Q. I think he had applied for a personal loan  
 22 in December 2016?

23 A. That's right. That had been refused.

24 Q. And based on your report, he had been paid reasonably  
 25 well for his teaching and translation work in the

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1 preceding year or two?

2 A. Yes.

3 Q. But nevertheless, his finances weren't holding together?

4 A. No.

5 Q. There may be a certain amount of speculation, but may it  
 6 be that the problems with his finances made it all the  
 7 more important for him to try to obtain work, as he  
 8 planned, overseas?

9 A. Yes, absolutely.

10 Q. May we move on to a different aspect of your report  
 11 before we turn to his planning and preparation for the  
 12 attack, and that's his period in prison?

13 A. Yes.

14 Q. Now, your team prepared a report about that which, for  
 15 the lawyers' reference, is {DC7597/1}. We've heard from  
 16 you already that Masood spent two periods of time in  
 17 prison, July 2000 to July 2001.

18 A. Yes.

19 Q. And May to December 2003.

20 A. That's correct, yes.

21 Q. I think your team carried out extensive investigations  
 22 into his time at prison on both those occasions?

23 A. Yes, we did. The Prison Service records were fairly  
 24 limited around these periods, but did confirm his  
 25 periods in prison.

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1 Q. You were able, looking at page 3 of that report, to  
 2 speak to a custodial manager at HMP Lewes, who gave you  
 3 an account of Masood as a prisoner?

4 A. That's right, yes.

5 Q. And in brief summary, what did he say about Masood's  
 6 character?

7 A. He described him as 35 years of age, which in the  
 8 population was older than average, which normally  
 9 generally they were 18–24, and as a result of his  
 10 maturity and behaviour he was located on the second  
 11 landing of the A wing. The second landing is where the  
 12 more sensible, non—problematic prisoners are generally  
 13 housed, and he has described him as "Polite, courteous  
 14 towards staff, and do not recall challenging staff at  
 15 all".

16 But he also says that other prisoners, especially  
 17 ones local to Eastbourne, were fearful of him and gave  
 18 him a wide berth. He explains around the pecking order  
 19 in prisons which may have had — may be the reason why  
 20 they gave him a wide berth, because they were fearful of  
 21 him.

22 Q. So, as described, somebody who wasn't a problem from the  
 23 authorities' perspective, but was evidently given, as  
 24 you say, a wide berth by other prisoners.

25 A. Yes.

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1 Q. Because of what they perceived as his capacities?  
 2 A. That's correct, yes.  
 3 Q. Then looking at page 4 of that report, I think you spoke  
 4 to a cellmate, recalling that Masood had converted to  
 5 Islam in 2000, the first time in prison, but really  
 6 accepted the religion on his second time in prison?  
 7 A. That's correct, yes, which is what we've confirmed  
 8 through other sources as well.  
 9 Q. I think, looking at page 5 of that report, your team  
 10 spoke to another prisoner who had been Muslim from  
 11 birth, and who described Masood as seeking knowledge of  
 12 Islam through his time in prison?  
 13 A. Yes.  
 14 Q. Looking at pages 8 and 9 of that report, did your  
 15 investigations turn up information about an attack on  
 16 an inmate at HMP Lewes while Masood was there?  
 17 A. Yes, that's correct. There were four other prisoners  
 18 asked a 22 year-old inmate to come out into one of the  
 19 cells. On doing so, one of them turned around and cut  
 20 his throat with an unknown weapon. There's no prison  
 21 record regarding this apart from the mention of it on an  
 22 intelligence report where Masood provided intelligence  
 23 about the fight involving other prisoners. So we're not  
 24 clear that Masood was actually involved in that  
 25 incident.

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1 Q. So you're not clear if he was involved in the attack or  
 2 merely present at the time that it took place?  
 3 A. That's right, yes, we believe he was just present.  
 4 Q. Now then, returning to your main report, please, at  
 5 page 23, paragraph 7.15, I would like to take this in  
 6 stages, please. In addition to his older children with  
 7 Ms Harvey, Masood had some younger children --  
 8 A. Yes.  
 9 Q. -- with Rohey. I'm not going to ask for details about  
 10 them, but is it right to say that in the period running  
 11 up to the attack, in the months, the weeks leading up to  
 12 the attack, Masood would often speak to them over video  
 13 calls in the evening?  
 14 A. That's true, yes.  
 15 Q. In the course of these calls, did they tell officers  
 16 that their father, Masood, had told them about dreams he  
 17 had had?  
 18 A. This is correct, yes.  
 19 Q. Just pause there a second. And without going into, as  
 20 I say, unnecessary details about the children, or their  
 21 discussions, is it right to say that the children told  
 22 you that Masood had interpreted some of these dreams as  
 23 suggesting something?  
 24 A. Yes.  
 25 Q. What did they tell you was his interpretation of some of

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1 his dreams?  
 2 A. That -- he told them that he was going to die fighting  
 3 for God.  
 4 Q. As far as your team was informed that, I think, wasn't  
 5 something that was passed on to their mother at the  
 6 time?  
 7 A. No.  
 8 Q. Can we turn to the planning and preparation for the  
 9 attack, which begins at page 21 of your report, and  
 10 begin, please, on 8 March 2017, two weeks before the  
 11 attack. {DC5201/21}. I'm looking at your paragraph 7.2  
 12 if it helps?  
 13 A. Yes, thank you.  
 14 Q. Did Masood on that date carry out some internet research  
 15 on 4x4 vehicles?  
 16 A. Yes, he researched Jeep Renegades, Hyundai Santa Fes,  
 17 Nissan X-Trail, all 4x4 vehicles.  
 18 Q. Then later in the day did he do anything based on that  
 19 research?  
 20 A. Yes, he reserved a Hyundai vehicle, index EK66 RWO  
 21 through Enterprise.  
 22 Q. So he reserved a Hyundai of the type that was to be used  
 23 in the attack?  
 24 A. Yes.  
 25 Q. And for what initial period did he reserve it?

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1 A. The hire period was between 16 and 20 March.  
 2 Q. Now, we know that he had emailed his mother about  
 3 visiting her some distance away from where he lived, on  
 4 16 March?  
 5 A. Yes, that's right.  
 6 Q. Now, on 9 March, so 13 days before the attack, did  
 7 Masood make a further significant purchase for the  
 8 purposes of the attack?  
 9 A. Yes, he attended a local Tesco store where he purchased  
 10 two kitchen knives, which we believe one of those was  
 11 used in the attack. Along with other shopping.  
 12 Q. I think you spoke to staff there about how he seemed?  
 13 A. Yes, the staff recall him being friendly towards them.  
 14 Q. Now, if we look, please, at {DC7960/4}, do we see here  
 15 a map on screen showing that the Tesco store he visited  
 16 was close to his own property?  
 17 A. Yes.  
 18 Q. And we see, I think, on screen the two knives?  
 19 A. That's correct, yes.  
 20 Q. Also inset a picture of Masood in the store on the  
 21 escalator?  
 22 A. Yes.  
 23 Q. And a picture of the Tesco receipt showing the two  
 24 knives?  
 25 A. Yes, we recovered that later after the attack.

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1 Q. We can take that down, please. On 10 March, the next  
 2 day, did he make any significant internet searches?  
 3 A. Yes, he searched on the internet for "Birmingham Calor  
 4 gas" and carried out a Google Maps search for the  
 5 Birmingham Calor Gas Centre on Mornington Road.  
 6 Q. Having considered his property, did it contain any  
 7 appliances that needed Calor gas?  
 8 A. No, it didn't, no.  
 9 Q. Is it therefore at least possible that he was  
 10 considering the potential use of a gas canister as  
 11 a weapon?  
 12 A. It is possible, yes. We carried out some reviews of  
 13 CCTV and we don't believe that he visited that place,  
 14 centre.  
 15 Q. So perhaps just an early idea?  
 16 A. Yes.  
 17 Q. But also on 10 March 2017, did Masood telephone Chase  
 18 Recruitment about his application for jobs in the  
 19 Middle East?  
 20 A. Yes.  
 21 Q. If we bring up {WS1656/3}, we see an email exchange on  
 22 10 March from somebody at the recruitment agency at the  
 23 bottom of the page thanking Masood for calling .  
 24 A. Yes.  
 25 Q. And giving a job description for an English language

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1 instructor in Saudi Arabia?  
 2 A. Yes.  
 3 Q. And in the exchange, Masood and the person from the  
 4 agency setting up a Skype interview the following day?  
 5 A. Yes, that's right.  
 6 Q. Now is this right: that that interview took place,  
 7 albeit as a telephone interview?  
 8 A. Yes.  
 9 Q. But Masood wasn't given a job offer?  
 10 A. That's correct, yes.  
 11 Q. So on 10 March 2017, he had made, as we have seen, some  
 12 preparations for what was to be the attack, but he was  
 13 also still at that stage making some inquiries or steps  
 14 with a view to working in Saudi Arabia?  
 15 A. Absolutely right, yes.  
 16 Q. We can take that off the screen, please.  
 17 Now, looking at your paragraph 7.8, on 14 March did  
 18 Masood's eldest daughter, so the one who was devoutly  
 19 Muslim, send a Twitter message to her sister, the second  
 20 daughter, who wasn't?  
 21 A. That's right, yes.  
 22 Q. I think they had been out of touch for some time?  
 23 A. Yes.  
 24 Q. And what did she say about Masood's plans to her sister  
 25 in that message?

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1 A. The message said:  
 2 "Hiya its Andi, Dad is leaving the country, he's  
 3 tried to contact u to see u on Friday before he goes.  
 4 Grandads dying."  
 5 Which is a reference to Masood's stepfather who was  
 6 in hospital.  
 7 Q. So that message suggesting that his eldest daughter also  
 8 believed Masood had firm plans to leave the country?  
 9 A. Yes.  
 10 Q. On 14 March, eight days before the attack?  
 11 A. That's right.  
 12 Q. Paragraph 7.9, on 15 March, one week before the attack,  
 13 was Masood making some significant internet searches?  
 14 A. He was, yes. He searched online for the Hyundai Tucson,  
 15 looking at YouTube videos on speed tests and crash  
 16 tests.  
 17 Q. So he was testing out -- he was checking on searches for  
 18 the vehicle's performance at speed and in crashes?  
 19 A. Yes.  
 20 Q. Also on 15 March, is it right that he sent from one  
 21 email address to another, both his email addresses,  
 22 a document entitled "Jihad"?  
 23 A. That's correct, yes, we discovered that later.  
 24 Q. We will look at the frontis page of that document later.  
 25 On 16 March 2017, did Masood visit Enterprise

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1 Rent-a-Car to collect the hire car which he had booked  
 2 as we had seen for that day?  
 3 A. That's correct, yes.  
 4 Q. If we go to {DC7960/6} we see, I think, there a map  
 5 showing once again the hire company was close to his own  
 6 address?  
 7 A. Yes.  
 8 Q. And an image showing him collecting the rental car?  
 9 A. Yes, that's right.  
 10 Q. And then next page, please, page 7 {DC7960/7}, this is  
 11 the hire contract, or invoice, showing the date out. It  
 12 may be difficult on many of the images to see it, but  
 13 the date out I think you know is 16 March?  
 14 A. Yes.  
 15 Q. And the middle column at the bottom shows the return  
 16 date of 20 March?  
 17 A. Yes, that's right.  
 18 Q. We can take that off screen now.  
 19 On that date, 16 March, where did he go in the hired  
 20 Hyundai?  
 21 A. He drove from Birmingham to Wales after he had collected  
 22 the vehicle, and he met with his mother and stepfather,  
 23 which -- we consider this to be what we now realise is  
 24 a goodbye visit.  
 25 Q. If we can bring up {DC7960/8}. We see here, I think,

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1 a map showing his journey?  
 2 A. That's correct, yes.  
 3 Q. When he got to Wales, where did he go first?  
 4 A. Initially he visited his stepfather in hospital, but  
 5 then he went back to his mother's house for the night  
 6 with her.  
 7 Q. We'll hear from her in more detail about what he said,  
 8 but did he tell her that he was thinking of moving to  
 9 a Muslim country?  
 10 A. Yes. And he alluded to the fact that he couldn't go  
 11 back to Saudi Arabia because of his criminal record.  
 12 Q. Did he mention a friend with a property in Morocco as  
 13 another option?  
 14 A. Yes, that's right.  
 15 Q. Evidently a reference to Mr El Farsi?  
 16 A. Yes.  
 17 Q. And as he was leaving the house, did he say something  
 18 significant to his mother?  
 19 A. Yes, as he was leaving the house -- this is on the  
 20 17th -- he turned over his shoulder and said "They'll  
 21 say I'm a terrorist, I'm not."  
 22 Q. So those were his parting words to his mother as she  
 23 reported them the police afterwards?  
 24 A. Yes, that's right.  
 25 Q. What was her reaction to that, spoken as she was

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1 shutting the door on him?  
 2 A. She didn't react to this comment because she was in the  
 3 course of leaving and she was shutting the door. She  
 4 was obviously on her way to visit her husband in  
 5 hospital.  
 6 Q. We can obviously ask her about that.  
 7 A. Yes.  
 8 Q. On the morning of 17 March, where did Masood go?  
 9 A. He drove to Brighton where he checked in at the Preston  
 10 Park Hotel.  
 11 Q. We can see that journey shown on the bottom of the map  
 12 on the screen marked in red. If we go to the next page,  
 13 {DC7960/10}, we can see that your team was able to  
 14 locate the guest registration document to confirm his  
 15 stay there that night?  
 16 A. That's correct.  
 17 Q. Take that off the screen, please.  
 18 On 18 March, the day after that overnight stay in  
 19 Brighton, where did he go?  
 20 A. On 18 March he left the hotel and made his way to  
 21 London, and where we know that at 12.44 he crossed over  
 22 Westminster Bridge in the Hyundai vehicle. He then  
 23 returned back eastwards at 12.52. I believe --  
 24 Q. We can look at some maps showing these movements and  
 25 then I'll ask you a couple of questions about them.

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1 First of all {DC7960/13}. You were able to, using ANPR  
 2 cameras, follow his -- track his journey after the event  
 3 from Brighton to London that day?  
 4 A. Yes.  
 5 Q. And identifying that he reached London, Central London,  
 6 at around 12.45?  
 7 A. Yes.  
 8 Q. And then {DC7960/15}, please. I think you, using CCTV  
 9 images, traced his movements once he had got to the  
 10 centre of town, travelling across Westminster Bridge  
 11 from south bank to north bank?  
 12 A. Yes, that's right, yes, and down Victoria Street.  
 13 Q. Down Victoria Street. A U-turn?  
 14 A. A U-turn in Victoria Street, yes.  
 15 Q. And then back down to Parliament Square and back across  
 16 Westminster Bridge in the opposite direction?  
 17 A. That's right, yes.  
 18 Q. If we look at {DC7960/16}, we see the first part of his  
 19 route with images inset to show how you were able to  
 20 track his vehicle using the CCTV footage?  
 21 A. Yes.  
 22 Q. And then next page, please, the second part of his  
 23 route, once again with inset images showing how you  
 24 identified his route?  
 25 A. Yes.

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1 Q. From your knowledge of the case, what was the apparent  
 2 purpose of this journey?  
 3 A. I believe that this was reconnaissance ahead of the  
 4 attack.  
 5 Q. So reconnaissance on 18 March?  
 6 A. On 18 March.  
 7 THE CHIEF CORONER: That's a Saturday, isn't it?  
 8 A. That's a Saturday, sir, yes.  
 9 MR HOUGH: Where did he go from Central London?  
 10 A. From central London he then drove south and made his way  
 11 to Cobham, to the services there where he checked into  
 12 the Welcome Break hotel, also known as the Days Inn.  
 13 Q. If we go to {DC7960/18}, we see a short journey marked.  
 14 The next page, please, {DC7960/19}. Once again you  
 15 were able to get his guest registration document to  
 16 confirm his stay?  
 17 A. Yes, that's right.  
 18 Q. And images, I think a number of images of him from his  
 19 stay there on CCTV?  
 20 A. Yes.  
 21 Q. Now, on 19 March, so the Sunday, did he extend his stay  
 22 there for another day?  
 23 A. He did, yes, that's right.  
 24 Q. And in the early hours of Monday, 20 March, did he watch  
 25 a number of videos?

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1 A. He did, yes.  
 2 Q. What were they?  
 3 A. In relation to other terrorist attacks, on the internet.  
 4 Q. So videos of Isis and other Islamic terrorist attacks?  
 5 A. Yes.  
 6 Q. Did he, that day, remain in Cobham and extend the hire  
 7 car for another day?  
 8 A. That's right, yes.  
 9 Q. Now moving to the day before the attack, 21 March, did  
 10 he again extend the hire car rental for another day?  
 11 A. Yes.  
 12 Q. And where did he go that day?  
 13 A. He checked out of the hotel in Cobham and then drove  
 14 back down to Brighton, where again he stayed at the  
 15 Preston Park Hotel.  
 16 Q. {DC7960/21}, we see his route shown up and an image of  
 17 him inset from the CCTV.  
 18 A. That's right, him leaving, yes.  
 19 Q. Yes, that was him leaving Cobham?  
 20 A. Yes.  
 21 Q. And then the next page, please {DC7960/22}, we have --  
 22 you were able to obtain for his stay on 21 March the  
 23 visitor book for the hotel in Brighton?  
 24 A. Yes.  
 25 Q. And do we see there that the staff have entered into the

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1 visitor book that he was a walk-in, and described him as  
 2 a "nice man".  
 3 A. That is correct, yes.  
 4 Q. We'll shortly see footage showing his demeanour at  
 5 around that time. We can take that off the screen.  
 6 On the evening of 21 March, did he have, as was  
 7 customary, a video call with his wife and young  
 8 children?  
 9 A. Yes, he did.  
 10 Q. And we will hear her evidence about that.  
 11 Did he also have a call with his eldest daughter  
 12 lasting a little over half an hour?  
 13 A. Yes.  
 14 Q. And through that call did she remain of the view that he  
 15 was going abroad?  
 16 A. She thought that he was still going to go to Morocco,  
 17 yes.  
 18 Q. Following the attack, did she believe that that call had  
 19 a different significance?  
 20 A. Yes, thinking back, she identified that in fact it was  
 21 their final conversation and it was his way of saying  
 22 goodbye.  
 23 Q. So now the day of the attack, 22 March, do you have  
 24 internet searches that he was carrying out that morning?  
 25 A. Yes, in the early hours of the morning Masood researched

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1 Prime Minister's Question Time and vehicle-borne  
 2 improvised explosive devices on the internet.  
 3 Q. Having done so, later that morning did he check out of  
 4 the Preston Park Hotel?  
 5 A. That's right.  
 6 Q. Where did he go from there?  
 7 A. He travelled back to London.  
 8 Q. Can we have on screen {DC7960/28}. Did you, once again,  
 9 using CCTV imagery pick up the movements of his vehicle  
 10 in Central London in the morning of 22 March?  
 11 A. We did, yes.  
 12 Q. And do we see here on this plan that you tracked him  
 13 going across Westminster Bridge from south bank to  
 14 north?  
 15 A. Yes.  
 16 Q. Across Parliament Square and down Victoria Street?  
 17 A. That's correct, yes.  
 18 Q. A U-turn on Victoria Street?  
 19 A. Yes, although I don't think we can be precise about  
 20 where that was, but we know from the timings that he  
 21 turned around at some stage.  
 22 Q. And then from Parliament Square a short trip down  
 23 Whitehall?  
 24 A. Yes.  
 25 Q. And then back to Parliament Square before crossing

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1 Westminster Bridge from north bank to south bank?  
 2 A. That's correct, sir, yes.  
 3 Q. If we go to the next page, {DC7960/29}, do we see that  
 4 you have identified the first part of the journey using  
 5 a number of CCTV images?  
 6 A. Yes.  
 7 Q. And the trip across Westminster Bridge was at 10.30 that  
 8 morning, I think.  
 9 A. That's right, yes.  
 10 Q. Then over the next pages, please, {DC7960/30} and  
 11 {DC7960/31} and {DC7960/32} and {DC7960/33}, we have  
 12 seen on those various pages the CCTV images you used to  
 13 construct each part of that journey in the centre of  
 14 town at about 10.30 that morning.  
 15 A. That's correct.  
 16 Q. Once again, are you able to express any view from your  
 17 knowledge of the investigation about the purpose of that  
 18 journey?  
 19 A. Again, I believe that was further reconnaissance ahead  
 20 of the attack.  
 21 Q. Can we now move on, take that off screen, to his later  
 22 movements. Was he picked up on camera after that at  
 23 11.18 that morning?  
 24 A. Yes, that's correct.  
 25 Q. And where was that?

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1 A. That was on the A3 at Clapham Road, the junction with  
 2 Stockwell Road, travelling southbound.  
 3 Q. So he went into South London after his --  
 4 A. Yes.  
 5 Q. -- after that 10.30 reconnaissance, and was he then  
 6 picked up at the same journey early in the afternoon?  
 7 A. Yes, at 13.52, travelling northbound.  
 8 Q. After that we know that he was due to return the car;  
 9 did he receive a communication from Enterprise?  
 10 A. Yes, the hire car called him and asked him to return the  
 11 car. He asked to extend it for another day using his  
 12 deposit, but they refused and asked him to return the  
 13 vehicle.  
 14 Q. From there, so from Clapham at 13.52, where did he go?  
 15 A. He then parked in St Thomas' Hospital car park.  
 16 Q. And when was that?  
 17 A. So he stayed in there until about 14.26.  
 18 Q. If we can bring up {DC7960/36}, do we see on this plan  
 19 that Masood arrived at St Thomas' Hospital at 13.59?  
 20 A. Yes.  
 21 Q. And that he left at about -- the grounds of the  
 22 hospital, just south of Westminster Bridge, at 14.31?  
 23 A. Yes.  
 24 Q. Nine minutes before the attack began?  
 25 A. That's correct.

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1 Q. And while there, did he send a number of texts and other  
 2 messages, first at 14.26 and then at 14.29?  
 3 A. Yes, he sent what's known as the "Jihad" document.  
 4 Q. We can bring that document, or the cover page of that  
 5 document up, {DC7960/38}. So first of all, do we see  
 6 from the picture on the front of the document that it's  
 7 a picture of Masood evidently in Mecca?  
 8 A. Yes.  
 9 Q. And identifying the date of that as March 2015, the date  
 10 of his pilgrimage there?  
 11 A. Yes.  
 12 Q. And we're not going to go through the document in  
 13 detail, but in summary, was it a series of quoted  
 14 passages from Islamic texts, Koranic Surah and other  
 15 sources of Islamic text?  
 16 A. Yes, that's right, sir.  
 17 Q. Which were apparently selected to justify his attack?  
 18 A. Yes, that's correct.  
 19 Q. Now, I think that document was examined by a police  
 20 intelligence manager with expertise in Islam,  
 21 a Mr Barry?  
 22 A. Yes.  
 23 Q. He concluded, I think, that it was not typical of such  
 24 material?  
 25 A. This is true. Yes. Yes.

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1 Q. Including, for example, because it used imagery.  
 2 A. That's right, yes, which is not common.  
 3 Q. And also that it did not include a specific  
 4 justification of the attack?  
 5 A. Yes, that's what Mr Barry said, yes.  
 6 Q. Now, that document, I think, was sent to numerous  
 7 contacts of Masood, not limited to people he knew  
 8 particularly well?  
 9 A. No. No. Our assessment is he sent it out to a random  
 10 group of people within his contact list.  
 11 Q. We have, and all the lawyers have, a full list of those  
 12 who received it?  
 13 A. Yes.  
 14 Q. Now, one of those to whom the message was sent, I think  
 15 at 14.29, was his wife, Rohey.  
 16 A. Yes.  
 17 Q. If we go to {WS1287I/55} we will see her response. The  
 18 top of the page, 14.32, a text message from her to  
 19 Masood:  
 20 "I need to speak with you urgently. I called u  
 21 earlier today."  
 22 A. Yes.  
 23 Q. Then at 14.51:  
 24 "What is this that you sent me?"  
 25 A. Yes, that's right.

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1 Q. I think in her statement, and we'll hear from her in due  
 2 course, she explained that she was utterly confused by  
 3 the message?  
 4 A. Yes, she was. Yes.  
 5 Q. We can take that down. So after sending those messages,  
 6 he left the grounds of St Thomas' at 14.31, and then was  
 7 picked up minutes later, parked in the bus lane, about  
 8 to commence the attack?  
 9 A. That's right, yes.  
 10 MR HOUGH: Sir, I'm now about to move to a video compilation  
 11 showing the planning and preparation for the attack;  
 12 would that be a convenient moment for a break?  
 13 THE CHIEF CORONER: Certainly. We'll do that.  
 14 Mr Hough, just before I do, can we just briefly talk  
 15 about timing tomorrow. Would it help if we sat a bit  
 16 earlier tomorrow than we have been doing?  
 17 MR HOUGH: I think it probably would. Our hope is that we  
 18 can complete the evidence not just of Mr Brown, but also  
 19 of both Rohey Hyudara and Janet Ajao tomorrow.  
 20 THE CHIEF CORONER: Yes.  
 21 MR HOUGH: And I'm keen from a perspective of humanity not  
 22 to either have them waiting around in court and sent  
 23 away --  
 24 THE CHIEF CORONER: Yes.  
 25 MR HOUGH: -- or, indeed, to be called here when they are

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1 not going to be required.  
 2 THE CHIEF CORONER: Yes.  
 3 MR HOUGH: I know Mr Patterson has a number of questions for  
 4 Mr Brown, but I'm hopeful that if I'm able to complete  
 5 this video this afternoon, and give him some time today  
 6 and obviously a fair amount of time tomorrow, that we  
 7 will have enough time for both those two witnesses  
 8 tomorrow as well.  
 9 THE CHIEF CORONER: Yes. I'm sure Mr Patterson will do his  
 10 best to accommodate that.  
 11 MR PATTERSON: Yes.  
 12 THE CHIEF CORONER: Mr Patterson, if we were to start in the  
 13 morning at 9.45, would that be helpful?  
 14 MR PATTERSON: That would be helpful, yes.  
 15 THE CHIEF CORONER: That's what we will do. We will take  
 16 a 10-minute break now.  
 17 (3.18 pm)  
 18 (A short break)  
 19 (3.36 pm)  
 20 THE CHIEF CORONER: Yes, Mr Hough.  
 21 MR HOUGH: DCI Brown, I think this is right, your colleagues  
 22 prepared a general compilation for this Inquest. We've  
 23 seen the second half, as it were, which shows the  
 24 attack.  
 25 A. Yes.

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1 Q. We're now going to see the first half, which shows  
 2 footage of the planning and preparation for the attack,  
 3 including a number of the events about which you have  
 4 told us over the last hour or two.  
 5 A. Yes.  
 6 Q. If we can bring up the first clip, please. We're going  
 7 to look at a series of clips from cameras in the Tesco  
 8 store in Birmingham on 9 March 2017.  
 9 (Video played in court)  
 10 A. Yes.  
 11 Q. Pause there. This shows Masood on the entrance  
 12 escalator of that store in Birmingham. This was his  
 13 visit to purchase the knives?  
 14 A. That's right, yes.  
 15 Q. Play on, please.  
 16 Now a clip of him wheeling a trolley around the  
 17 store, at this point apparently an empty trolley?  
 18 A. That's correct.  
 19 Q. We get an impression of his size and bulk.  
 20 A. Yes.  
 21 Q. Then another clip showing his continued progress around  
 22 the store, now with some items in the trolley?  
 23 A. Yes.  
 24 Q. And a clip of him approaching the till.  
 25 A. Yes.

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1 Q. And finally a clip that will show him leaving the store  
 2 on the escalator going down?  
 3 A. Yes.  
 4 Q. There he is in view.  
 5 Next we will see a clip from the Enterprise  
 6 Rent-a-Car premises in Birmingham, showing his hiring of  
 7 the car.  
 8 A. Yes.  
 9 (Video played in court)  
 10 Q. This is on 16 March 2017, before he drives it to Wales?  
 11 A. Yes.  
 12 Q. Just to be clear, there isn't any audio for this  
 13 footage, is there?  
 14 A. No, that's right.  
 15 Q. So he is in conversation for a little time with the  
 16 Enterprise employee?  
 17 A. Correct.  
 18 Q. Then the keys are handed over.  
 19 A. Yes, and then he drove to Wales.  
 20 Q. Then the next clip we'll see is from a camera on the  
 21 St Thomas' Hospital side of the bridge,  
 22 Westminster Bridge, showing Masood's crossing the bridge  
 23 in the car on 18 March 2017, the visit you describe as  
 24 a likely reconnaissance trip?  
 25 A. That's correct, yes.

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1 Q. Play on, please.  
 2 (Video played in court)  
 3 A. This was the Saturday.  
 4 Q. Then the same day, a camera at the junction of  
 5 Parliament Street and Great George Street, looking  
 6 towards the bridge, with Masood's car circled?  
 7 (Video played in court)  
 8 A. Yes.  
 9 Q. Then the same camera showing the car coming in the  
 10 opposite direction over the bridge?  
 11 A. Yes.  
 12 Q. Then the camera on the St Thomas' Hospital side showing  
 13 Masood driving the remaining part of the distance  
 14 towards the south bank, having completed his  
 15 reconnaissance.  
 16 A. That's correct.  
 17 Q. Then on 18 March, footage of Masood, I think, checking  
 18 into the Welcome Break/Days Inn hotel in Cobham?  
 19 A. Yes.  
 20 Q. Play on.  
 21 (Video played in court)  
 22 This is some of the closest footage of him, showing  
 23 pretty normal demeanour.  
 24 A. Yes, and it gives you an impression of his build as  
 25 well.

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1 Q. Further footage from the Days Inn.  
 2 A. Yes. On the 19th.  
 3 THE CHIEF CORONER: This is now, I think, the day after, the  
 4 19th.  
 5 MR HOUGH: And further footage, making a card payment?  
 6 A. Yes.  
 7 Q. On, I think, the 20th; is that right?  
 8 A. I think this shows the 19th.  
 9 Q. The 19th, sorry.  
 10 THE CHIEF CORONER: I think earlier on, Mr Hough, we heard  
 11 that he extended his stay on the 19th.  
 12 MR HOUGH: Yes. We see him on each of these clips chatting,  
 13 often smiling or laughing, with the reception staff?  
 14 A. Yes.  
 15 Q. Now we're looking at footage, I think, on 21 March with  
 16 him checking out from the Days Inn.  
 17 A. That's correct, before he went down to Brighton.  
 18 Q. We can see the size of his holdalls, I think.  
 19 A. Yes.  
 20 Q. Two large black holdalls.  
 21 A. Correct.  
 22 Q. So that's his demeanour on the morning of the day before  
 23 the attack?  
 24 A. Yes.  
 25 Q. Two large holdalls and a wheelie case?

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1 A. Yes.  
 2 Q. Then we'll now see footage from a Sainsbury's in  
 3 Brighton on 21 March. As you have told us, he went  
 4 there for the night before the attack?  
 5 A. That's correct, this is quite close to the hotel, the  
 6 Preston hotel.  
 7 Q. Play on, please.  
 8 (Video played in court)  
 9 So just before 1.00 pm that day?  
 10 A. That's right, lunchtime.  
 11 Q. Then in the evening of that day, footage from a fish and  
 12 chip restaurant in Brighton.  
 13 A. That's correct, yes, this is the night before the  
 14 attack.  
 15 (Video played in court)  
 16 Q. Pictures of the Palace of Westminster on the screen we  
 17 saw, the screen that he was watching.  
 18 Now, pause there. We're now going to look at  
 19 footage from the day of the attack, beginning with the  
 20 trip into Central London at around 10.30 that morning,  
 21 which you identified as further possible reconnaissance.  
 22 A. Yes.  
 23 Q. Play on, please.  
 24 (Video played in court)  
 25 We've now got footage from the camera looking over

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1 Westminster Bridge from the south bank side. Masood's  
 2 vehicle circled as it goes from the south to the north  
 3 bank at just before 10.30 am.  
 4 A. Yes.  
 5 Q. Then footage from a camera in Parliament Square --  
 6 A. Correct.  
 7 Q. -- showing the vehicle passing New Palace Yard on the  
 8 Bridge Street side?  
 9 A. Yes, sir.  
 10 Q. Footage from the same camera showing the vehicle making  
 11 its way back across Westminster Bridge?  
 12 A. The return journey, yes.  
 13 Q. And footage from the camera on the south bank side  
 14 looking over the bridge, again with the car circled,  
 15 showing the reconnaissance concluded?  
 16 A. That's correct, yes.  
 17 Q. Pause there. We're now seeing footage from the car park  
 18 of St Thomas' Hospital at 13.59, and we'll see the car  
 19 driven into the car park, this time before it is parked  
 20 there for some time.  
 21 A. Yes.  
 22 Q. Play on, please.  
 23 (Video played in court)  
 24 Then the car drives out of view?  
 25 A. Yes.

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1 Q. There's footage of the car going, I think, further into  
 2 the car park at 14.01?  
 3 A. Yes.  
 4 Q. Once again, going out of view?  
 5 A. Yes.  
 6 Q. Then at 14.26 it comes back into view.  
 7 A. That's correct.  
 8 Q. Driving towards the exit.  
 9 A. Yes.  
 10 Q. Then we see it picked up on the camera near the exit to  
 11 the car park at 14.26.  
 12 A. I think this is an entry--only so he has to readjust.  
 13 Q. The car enters view and then reverses?  
 14 A. That's correct, yes.  
 15 Q. And manoeuvres around. He drives back into the car park  
 16 area, 14.26. Then I think the vehicle is parked over  
 17 a period 14.28 to 14.31?  
 18 A. Yes, that's right.  
 19 Q. And during that time, 14.28 to 14.31, pause there,  
 20 during that time, 14.28 to 14.31 was the jihad  
 21 attachment sent to the contacts in the two sets of  
 22 messages?  
 23 A. That's correct, yes. That's when we believe it was  
 24 sent.  
 25 Q. So that's evidently what Masood was doing when he had

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1 parked the car at that point in St Thomas' Hospital  
 2 shortly before the attack?  
 3 A. That's right.  
 4 Q. Then play on, please. We see through a different exit  
 5 he leaves the car park?  
 6 A. Yes, towards the bridge.  
 7 Q. Pause there. We can take that off the screen.  
 8 So he has left the car park at 14.31 and then, is  
 9 this right, his car was next captured at 14.38 in the  
 10 bus lane before it set off for the attack?  
 11 A. Yes, footage we've already seen over the Inquest.  
 12 That's right.  
 13 MR HOUGH: Thank you very much. Those are my questions.  
 14 There will be others.  
 15 A. Thank you, sir.  
 16 Examination by MR PATTERSON QC  
 17 MR PATTERSON: Chief Inspector, as you know, I ask questions  
 18 on behalf of the families of the four people killed by  
 19 Masood on the bridge.  
 20 A. Yes, sir.  
 21 Q. I'd like to begin, please, with your assistance as to  
 22 who or what Masood was targeting, and I think it's  
 23 right, isn't it, that back at the end of 2016, there's  
 24 evidence to suggest that he was in the Westminster area  
 25 at the underground station at Westminster on 31 October,

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1 according to a Visa statement?  
 2 A. Yes, and we believe he was visiting the Foreign and  
 3 Commonwealth Office on that day.  
 4 Q. So the purpose of that visit, it seems, was related to  
 5 his desired travel to Saudi Arabia which you've told us  
 6 about already?  
 7 A. That's right, that's what we believe anyway.  
 8 Q. Certainly it seems he was at the Foreign Office and he  
 9 was at Westminster underground station that day?  
 10 A. Yes.  
 11 Q. He left in his car when he carried out the attack  
 12 a laptop, didn't he?  
 13 A. Yes.  
 14 Q. And it was registered in his own name?  
 15 A. Yes.  
 16 Q. The password was Islam 1?  
 17 A. Yes.  
 18 Q. The installation date was 7 October last year, or 2016.  
 19 A. Yes, mm-hm.  
 20 Q. So no effort was made by him to in any way disguise his  
 21 internet searches or what he was doing on that machine?  
 22 A. So we discovered later on, yes.  
 23 Q. In fact, he also left his driving licence with  
 24 a photograph and, indeed, his CV in the car waiting to  
 25 be discovered.

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1 A. He did. I mean, he had all his possessions in that car  
 2 with him, bearing in mind he'd been on the road for  
 3 a few days.  
 4 Q. But he will have known that they would be there to be  
 5 discovered by the police?  
 6 A. Yes.  
 7 Q. Can we see on the screen, please, the timeline document,  
 8 which I think members of your team pulled together; is  
 9 that right?  
 10 A. Yes.  
 11 Q. A chronological schedule, or sequence of events. It's  
 12 document {DC7505} and if we go, please, to 30 December,  
 13 page 22, and entry 316, please. {DC7505/22}.  
 14 THE CHIEF CORONER: It's the top entry on the page.  
 15 MR PATTERSON: We may need to scroll across, but on  
 16 30 December, do we see that on that laptop that was left  
 17 by him in the car, he was searching "Prime Minister  
 18 Teresa May"?  
 19 A. Yes.  
 20 Q. And if we go forward, please, in the timeline to page 53  
 21 and to the morning of the attack, you've touched upon  
 22 this briefly, Chief Inspector, but at 5.55 on the  
 23 morning of the attack, again using that same laptop that  
 24 he left in the car, there was a search for "When is  
 25 Prime Minister's Questions"?

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1 A. That's correct, yes. 5.55, is it?  
 2 THE CHIEF CORONER: This is line 933?  
 3 MR PATTERSON: If we come across from 933.  
 4 THE CHIEF CORONER: I think it might be the one below that,  
 5 we can see it, "When is Prime Minister's Questions".  
 6 MR PATTERSON: I'm grateful. I don't know if the  
 7 highlighter is available. Four up from the bottom, is  
 8 that right, Mr Brown?  
 9 A. Sorry, can you repeat the reference, I have a paper copy  
 10 in front of me?  
 11 MR PATTERSON: Yes, it is page 53, entry 933 at 5.55, it's  
 12 been highlighted there, using Bing, the search was "When  
 13 is Prime Minister's Questions".  
 14 A. That's correct, yes.  
 15 Q. And in the entries that followed this, again, it appears  
 16 that his mind is focusing on the Houses of Parliament  
 17 and PMQs, isn't it?  
 18 A. It is, yes, that's right.  
 19 Q. At 5.56, he accesses the BBC's website which provides  
 20 access to recordings of PMQs.  
 21 A. Correct.  
 22 Q. At 5.57, he went to the BBC's Parliament channel on  
 23 iPlayer?  
 24 A. Yes.  
 25 Q. And at 5.57 he went to Parliament's own website, so

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1 leaving the BBC and going to the Parliament website  
 2 where it's possible to gain access to recordings of  
 3 Prime Minister's Questions filmed in the House?  
 4 A. That's correct, yes.  
 5 Q. So all of that a little before 6.00 am, and then shortly  
 6 after that he left his hotel room in Brighton and he set  
 7 off to Westminster in the 4x4.  
 8 A. That's right.  
 9 Q. Is that the sequence?  
 10 A. Yes.  
 11 Q. If we go, please, in that same -- in the graphics  
 12 bundle, so {DC7960/15}, I would like to ask you about  
 13 the reconnaissance, because the reconnaissance some days  
 14 earlier on Saturday the 18th involved him going over the  
 15 bridge, round the square, a U-turn in Victoria, back to  
 16 the square, and straight south over the bridge again?  
 17 A. Yes.  
 18 Q. However, the reconnaissance on the morning of the  
 19 attack, if we go, please, to {DC7960/28} of the same  
 20 bundle, had one significant difference, didn't it?  
 21 A. That's right, yes. The car travelled along Whitehall,  
 22 past Downing Street.  
 23 Q. So instead of carrying on as before from the square,  
 24 straight south over the bridge, he chose to turn left?  
 25 A. Yes.

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1 Q. And went along past Downing Street and then turned and  
 2 came back along past Downing Street and then turned and  
 3 went south of the bridge?  
 4 A. That's correct, yes. We're not quite sure exactly where  
 5 he went round Whitehall Place, there's a slight break in  
 6 the CCTV, but certainly, yes, he went along Whitehall.  
 7 Q. Is there a part of the journey at that stage where the  
 8 CCTV coverage is missing?  
 9 A. That's correct, yes.  
 10 Q. Which bit is not covered by the footage?  
 11 A. You can see there that at 11.02.52 he turns right into  
 12 Whitehall Place, 11.03.18 he turns back into Whitehall.  
 13 Q. So the detail of the turn is missing?  
 14 A. That's correct.  
 15 Q. But if we go to the stills, please, this is now  
 16 something around 11.00 am; is that right?  
 17 A. Yes, that's right.  
 18 Q. If we go to page 32 of the same bundle {DC7960/32},  
 19 we've got some of the stills?  
 20 A. Yes.  
 21 Q. And we can see some stills showing him go past Downing  
 22 Street in one direction, back again in the other  
 23 direction. So a little less than an hour before Prime  
 24 Minister's Questions which began, as we know that day,  
 25 at 12 noon?

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1 A. That's correct.  
 2 Q. So in the period that he might have thought that the  
 3 Prime Minister might be moving from Downing Street  
 4 towards the House?  
 5 A. Possibly, yes.  
 6 Q. I think when your team interviewed some of his children,  
 7 they indicated that he had made comments about two  
 8 politicians in particular: Donald Trump, and  
 9 Theresa May; is that right?  
 10 A. Yes.  
 11 Q. He had spoken about what he described as racism and  
 12 rudeness from the President?  
 13 A. That's correct.  
 14 Q. And he described Theresa May as a liar and said that she  
 15 was sick.  
 16 A. Yes.  
 17 Q. And I think, Chief Inspector, it's right, isn't it, that  
 18 in the past there have been violent jihadists who have  
 19 previously shown an interest in Downing Street and in  
 20 the Houses of Parliament?  
 21 A. There have been notable cases in the last couple of  
 22 years, yes.  
 23 Q. Indeed, going further back than just a couple of years.  
 24 If we go, please, to {DC8028/1}, a significant terrorist  
 25 plot that was tried at this court and resulted in

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1 convictions for a fertiliser bombing plot resulted in  
 2 convictions in about 2007, isn't that right?  
 3 A. Yes, sir.  
 4 Q. And we have some of the details on the screen from some  
 5 of the reporting at the time. These were defendants who  
 6 were linked to ALM, Al-Muhajiroun, the proscribed  
 7 terrorist organisation?  
 8 A. I think so.  
 9 Q. They had links to Crawley in Sussex?  
 10 A. I think that was publicised, yes.  
 11 Q. And if we go please to {DC8028/3} of the report of the  
 12 trial and some of the details of their targeting, it is  
 13 right that amongst various places that they had spoke of  
 14 as being potential targets is included: Prime Minister's  
 15 Question Time, if we look at the bottom of the page.  
 16 A. I believe so. I believe there were a number of targets  
 17 mentioned.  
 18 Q. Including the Ministry of Sound, Bluewater shopping  
 19 centre?  
 20 A. That's right, yes.  
 21 Q. But it was certainly amongst the targets being discussed  
 22 by those jihadists.  
 23 If we go, please, to {DC8031/1}, more recently, two  
 24 defendants from Luton with links, again, to  
 25 Al-Muhajiroun were convicted of a domestic terror plot.

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1 The evidence of which included them driving around  
 2 Westminster and, as we can see from this report of the  
 3 trial, making a video entitled "Isis drives around  
 4 Westminster" showing footage filmed from their car of  
 5 both the Houses of Parliament and Downing Street as they  
 6 drove past, playing music and recordings from Baghdadi,  
 7 the leader of Isis.  
 8 A. Yes, I'm familiar with the case from the media.  
 9 Q. So going back to Masood, if he was targeting the Prime  
 10 Minister, he wouldn't have been the first extremist with  
 11 links to ALM to have shown such an interest, would he?  
 12 A. No, there have been other notable terrorist cases with  
 13 others that have tried to carry out attacks in that area  
 14 as well. I think recently there was a conviction.  
 15 Q. Of an actual plot on the Prime Minister herself?  
 16 A. Yes, which was publicised in the media, and there was  
 17 another one, there was a plot, a gentleman walked along  
 18 Whitehall with knives, that was convicted as well.  
 19 Q. And as we know, when Masood stormed into the  
 20 Houses of Parliament through the gates, at the point  
 21 when he was shot, he was running in the direction of  
 22 members' entrance?  
 23 A. He was running in the direction of Parliament, yes.  
 24 Yes.  
 25 Q. A different point, please, Mr Brown. The nature of the

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1 threat posed. Your experience, I think, involves  
 2 investigations within Counter Terrorism Command of  
 3 a wide range of domestic terror plots; yes?  
 4 A. Yes.  
 5 Q. And radical jihadists?  
 6 A. Yes.  
 7 Q. And the ideology isn't simply one that involves a belief  
 8 that there's some sort of obligation or duty to fight;  
 9 it's an ideology that goes further than that, isn't it?  
 10 It's an ideology that involves celebrating martyrdom in  
 11 the process of fighting violent jihad?  
 12 A. Yes, that's very well known, that martyrdom is very much  
 13 the aim of the terrorists within a lot of these cases.  
 14 Q. And increasingly in some of the extreme cases, it's  
 15 a belief that you will die and go to paradise and be  
 16 celebrated as a martyr if you die in the process of  
 17 killing non-believers?  
 18 A. That's very well reported in the media and is true, yes.  
 19 Q. And that makes it all the more difficult for these plots  
 20 to be detected, especially if it's somebody acting on  
 21 their own?  
 22 A. Yes.  
 23 Q. And it highlights the danger that they pose by launching  
 24 unexpected attacks in a time or in a place when nobody  
 25 is prepared for it?

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1 A. That's correct.  
 2 Q. A different topic, please.  
 3 His use of violence. So you've told us about  
 4 Masood's earlier days and what you have unearthed in  
 5 terms of his use of serious violence. Both his mother  
 6 and his brother regarded him as a violent person?  
 7 A. Certainly, yes, from the evidence that we have  
 8 recovered, yes, that's clear.  
 9 Q. One of the earliest episodes that you told us about  
 10 involving an offensive weapon back in 1998, I think  
 11 that's the first real piece of hard evidence of  
 12 violence, was when he was aged 23?  
 13 A. Yes.  
 14 Q. So when we begin the chronology of his use of violence,  
 15 this isn't somebody who is a youngster, as a teenager  
 16 was getting involved in perhaps minor scuffles or  
 17 affrays or things like that; it began in his 20s?  
 18 A. According to the records and the evidence, yes.  
 19 Q. The first recorded episodes; yes?  
 20 A. Yes.  
 21 Q. And it escalated in seriousness?  
 22 A. Absolutely. The two incidents that he, one was  
 23 convicted for, and the other one he went on remand and  
 24 was found not guilty, were both obviously very serious,  
 25 violent incidents.

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1 Q. And it continued over many years until, I think,  
 2 certainly something in the region of the age of 38?  
 3 A. 2003 was the last one.  
 4 Q. So you analysed the period of time, that this was  
 5 sustained, repeated violence growing in severity; yes?  
 6 A. Yes, until 2003, yes.  
 7 Q. Jane Harvey, who had that early relationship with him,  
 8 told your team that:  
 9 "Before we met, he was always fighting."  
 10 That was her understanding of his background before  
 11 she began that relationship?  
 12 A. Yes.  
 13 Q. And one person who was a neighbour, I think, Mr Boyce,  
 14 in a statement that you took, described an occasion when  
 15 there was a run-in between two sets of children and  
 16 Masood said, "I'll go and stab him for you" in relation  
 17 to what he would do with the father of the other  
 18 children.  
 19 A. I recall that remark from the statement, yes.  
 20 Q. And that person, that neighbour who knew him at that  
 21 stage, in 1996 or 1997, got the impression that this was  
 22 not only a violent man, but an angry man?  
 23 A. Yes.  
 24 Q. And is that a theme that we see, Mr Brown, again and  
 25 again in his statements that have been taken, that there

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1 was a lot of anger that he had?  
 2 A. I think that's fair to say, yes. Many people describe  
 3 him as such.  
 4 Q. An episode in August 1998 when he spat on a woman and  
 5 punched her in the face, resulting in swelling to the  
 6 nose and bleeding?  
 7 A. Yes.  
 8 Q. And then the slashing to Piers Mott to the face with  
 9 a flick knife resulting in more than 20 stitches being  
 10 required?  
 11 A. Yes.  
 12 Q. After which he carried on by attacking his car and  
 13 slashing the tyres of his car and his seats; is that  
 14 right?  
 15 A. That's right, that's the Mott incident, yes.  
 16 Q. I think one of your officers spoke with the widow of the  
 17 victim who indicated that at that time, Masood was well  
 18 known for carrying knives?  
 19 A. That's what she indicated to us in her statement, yes.  
 20 Q. And another person from whom you took a statement, [Lee  
 21 Lawrence] who used to drink with him said that over time  
 22 the violence got worse, and that he would fight with  
 23 people and he would glass people.  
 24 A. That's correct, that's in that period until 2003.  
 25 Q. After his release from prison, and the first period in

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1 prison that you told us about, with the Piers Mott flick  
 2 knife attack, you told us that he had a relationship  
 3 with a girlfriend?  
 4 A. Yes.  
 5 Q. In a statement that she gave about the assault on her,  
 6 did she describe him using the word "nutter"?  
 7 A. I believe so. I don't know that to hand, off the top of  
 8 my head, but I wouldn't dispute that.  
 9 Q. Did she say that he introduced her to drugs and she  
 10 began taking cocaine while he was injecting steroids?  
 11 A. I recall that from the statement, yes.  
 12 Q. He was controlling and would put her down?  
 13 A. Yes.  
 14 Q. Commenting on her appearance and her clothing and  
 15 telling her what to wear. And is she a second person  
 16 who said that at that time he would carry a knife?  
 17 A. Yes.  
 18 Q. She describes a violent occasion when:  
 19 "There was a guy in a restaurant who made eye  
 20 contact with him. He was straight in there with his  
 21 knife drawn."  
 22 Is what she described?  
 23 A. Again, I don't have the statement in front of me but  
 24 I recall that reference in the statement, yes.  
 25 Q. And it ended up with the victim begging Masood not to

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1 harm him.  
 2 A. Yes, we don't have that as a report to police, just from  
 3 her statement.  
 4 Q. That was her account?  
 5 A. Yes.  
 6 Q. She described him as a liar and a narcissist; is that  
 7 right?  
 8 A. Yes.  
 9 Q. And said that he was taking drugs, he was involved in  
 10 fraud, and describes a night when he lifted her by the  
 11 neck and attempted to strangle her.  
 12 A. Yes.  
 13 Q. You said that there was evidence that there was  
 14 intimidation of witnesses, and I think he was charged  
 15 with intimidation; is that right?  
 16 A. I believe so, yes. Again, I don't have that statement  
 17 to hand but I do believe so.  
 18 Q. And she said that she initially gave a statement to the  
 19 police but word reached her of threats that her mother  
 20 would be raped and her dogs would be killed, and she  
 21 describes witnesses withdrawing from that prosecution?  
 22 A. Yes.  
 23 Q. And she said this:  
 24 "Adrian was vile. He was controlling, violent,  
 25 obsessive, intelligent and narcissistic. I am amazed

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1 that he is religious. I honestly believe that this is  
 2 a front, an excuse to hurt people. He would have loved  
 3 the attention and fear [that] he has caused."  
 4 Is that what she said in her statement to the  
 5 police?  
 6 A. That's correct.  
 7 Q. And I think you have spoken to the officer in charge of  
 8 that investigation, a Detective Constable Lee Garland  
 9 who has now retired, who indicated that his  
 10 understanding was that at the time Masood was not only  
 11 using cocaine but was also dealing cocaine.  
 12 A. Yes.  
 13 Q. You touched upon an assault of two people in a pub.  
 14 That's a second occasion when there was the use of  
 15 a knife, apparently to attack somebody to the face?  
 16 A. Yes.  
 17 Q. Although witnesses either failed to identify him or  
 18 declined to identify him, and you mentioned that there  
 19 was suspected intimidation on that occasion when the  
 20 police were investigating?  
 21 A. That's correct, yes.  
 22 Q. There was an attack with a baton that resulted in  
 23 a victim suffering a fractured collarbone and  
 24 a dislocated shoulder, and the victim refused to attend  
 25 an identification parade, so that allegation ended; is

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1 that right? March 2003.  
 2 A. Yes, the case was withdrawn.  
 3 Q. And then we have the Danny Smith knife attack in respect  
 4 of which he was found not guilty, which was in May 2003?  
 5 A. Yes, that's the last period in custody.  
 6 Q. So whether it was self-defence or not, that was a third  
 7 occasion when it seems he used a knife --  
 8 A. Yes.  
 9 Q. -- to cause serious injuries, again, to the face?  
 10 A. That's correct, yes.  
 11 Q. The officer in charge of that case was once again,  
 12 I think, Detective Constable Garland; is that right?  
 13 A. I think so. Or it may be DC Black.  
 14 Q. And also DC Black, so two officers involved in that.  
 15 Did DC Garland indicate when you spoke to him that the  
 16 judge had remarked at the end of the trial as to his,  
 17 the judge's, surprise at the acquittal?  
 18 A. I think there was some surprise around the acquittal,  
 19 yes.  
 20 Q. And did the officer see Masood some days later by chance  
 21 and did Masood admit that he had "Got lucky", to use his  
 22 words?  
 23 A. Yes.  
 24 Q. And, as I think you've told us, some of the people that  
 25 you tracked down who knew Masood at the time,

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1 a Ms Webster and a Mr Donohoe, both indicated that he  
 2 had spoken to them about this and had made it plain that  
 3 it was in the context of him doing a drug deal?  
 4 A. Yes.  
 5 Q. And so all of that, the results of all of those  
 6 inquiries, Mr Brown, that you have carried out and  
 7 helped us with today, shows not just serious injuries  
 8 and the repeated use of knives, but also repeated  
 9 references to drug dealing?  
 10 A. That's correct, yes, up until 2003.  
 11 Q. And so is it realistic to take the view that the context  
 12 of his violence and his dealings would have involved him  
 13 mixing in a dangerous underworld in which further  
 14 violence that might never have been reported might  
 15 equally have taken place?  
 16 A. I think I would be speculating if I went that far, sir.  
 17 Certainly we know that he was involved in violence and  
 18 drug dealing at the time, until 2003. I wouldn't want  
 19 to speculate any broader than that because I simply  
 20 don't know.  
 21 Q. But certainly all those details about his violence,  
 22 clearly there's some further detail you have got from  
 23 witnesses you have spoken to?  
 24 A. Yes.  
 25 Q. But a lot of it comes from records held by the police?

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1 A. There are some records, yes, of the more recent events.  
 2 The older records don't hold any detail because of the  
 3 sheer length of time it was ago.  
 4 Q. We will hear in due course from a witness from MI5 as to  
 5 what information they requested or held about Masood and  
 6 his record and his use of violence, but presumably any  
 7 records held by the police, if they'd been requested by  
 8 the security service at any time, they would have been  
 9 replied to the security service?  
 10 A. We share information with the security services, sir,  
 11 very regularly, yes.  
 12 Q. Yes. And so if they asked for copies of his list of  
 13 previous convictions or for Sussex Police records about  
 14 slashing people repeatedly with knives to the face, all  
 15 of that, it wouldn't have been withheld, would it?  
 16 A. No.  
 17 Q. And have you any reason to believe that because of,  
 18 perhaps, aliases or administrative errors or date of  
 19 birth mix-ups or anything like that, that there were any  
 20 errors in providing to MI5 details of his record?  
 21 A. No. No reason to believe that.  
 22 Q. Yes.  
 23 THE CHIEF CORONER: Mr Patterson, I was going to at some  
 24 stage ask whether a convenient time to break for you --  
 25 MR PATTERSON: This would be, actually, because I was about

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1 to begin another topic, which is a completely different  
 2 issue.  
 3 THE CHIEF CORONER: Right. We will break. I was just going  
 4 to ask, also, two other questions, Mr Patterson. We're  
 5 going to start at 9.45 tomorrow. That will give enough  
 6 time, I hope, for you to complete the areas you want to  
 7 explore. I suspect you have been in discussion with  
 8 Mr Hough about timings.  
 9 MR PATTERSON: We have. We're hopeful to conclude all three  
 10 witnesses tomorrow.  
 11 THE CHIEF CORONER: Fantastic. The only thing I was going  
 12 to say is if by breaking now we are going to put that at  
 13 risk, we will carry on for a bit longer.  
 14 MR PATTERSON: I don't see a difficulty.  
 15 THE CHIEF CORONER: Very well. We will break there and pick  
 16 up on that, Mr Brown, tomorrow morning at 9.45.  
 17 Thank you.  
 18 A. Thank you, sir.  
 19 THE CHIEF CORONER: I'll rise.  
 20 (4.22 pm)  
 21 (The court adjourned until 9.45 am on  
 22 Thursday, 20 September 2018)  
 23  
 24  
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