

OPUS 2

INTERNATIONAL

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

Day 21.1

October 11, 2018

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1 Thursday, 11 October 2018
 2 (10.00 am)
 3 (Proceedings delayed)
 4 (10.17 am)
 5 (In the presence of the jury)
 6 THE CHIEF CORONER: Good morning, everyone. Nice to see you
 7 all. I think there were some transport difficulties for
 8 a number of you this morning, but nice to see you all
 9 here.
 10 Mr Hough.
 11 MR HOUGH: Sir, our first witness is DCI Dan Brown.
 12 DCI DAN BROWN (Sworn)
 13 Examination by MR HOUGH QC
 14 MR HOUGH: Would you please give your name and rank to the
 15 court?
 16 A. My name is Dan Brown. I'm a detective chief inspector
 17 with the Counter Terrorism Command.
 18 Q. Mr Brown, you understand I will ask questions of you
 19 first on behalf of the Coroner and then you may be asked
 20 questions by other lawyers?
 21 A. Yes, sir.
 22 Q. Were you and are you deputy senior investigating officer
 23 of Operation Classific, the investigation into the
 24 Westminster Terror Attack?
 25 A. I am, yes.

1

1 Q. Is it right that the investigation has carried out very
 2 extensive inquiries into the life and background of
 3 Khalid Masood?
 4 A. Yes, that's correct.
 5 Q. Was one purpose of those inquiries to assist initial
 6 investigations into whether anyone else was involved in
 7 the preparation or planning of the attack, or aware it
 8 was to happen?
 9 A. Yes, that's true. Yes.
 10 Q. Was another purpose to assist the Inquests, both the
 11 inquests of the victims and his own inquest, which are
 12 considering his life as part of the background to the
 13 attack?
 14 A. Yes.
 15 Q. Is it right that you and your colleagues have prepared
 16 a number of reports dealing with his life and
 17 background?
 18 A. Yes, we have.
 19 Q. You understand, I think, that you are now giving
 20 evidence to set out what you learned in summary form?
 21 A. Yes, sir.
 22 Q. The investigation also, is this right, had as a central
 23 purpose to examine how Khalid Masood planned, prepared
 24 for and executed the attack?
 25 A. Yes.

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1 Q. And that your reports also cover his planning and
 2 preparation?
 3 A. Yes, they do.
 4 Q. And you will be giving evidence as to that today as
 5 well?
 6 A. Yes.
 7 Q. May we begin, then, with Khalid Masood's early life and
 8 education. Looking at paragraph 2.1 of your main
 9 report, could you tell us his date and place of birth?
 10 A. Yes, he was born in Hainault Maternity Hospital in Erith
 11 on 25 December 1964.
 12 Q. What was his birth name?
 13 A. He was born as Adrian Russell Elms.
 14 Q. In general terms, is it right to say that his early
 15 years were generally unremarkable?
 16 A. Yes, that's correct.
 17 Q. Is it also right that he comes from a family or came
 18 from a family with younger brothers and parents who have
 19 never been in trouble with the police?
 20 A. That's correct.
 21 Q. Also that he was not brought up as a Muslim?
 22 A. That's correct, yes.
 23 Q. Now, you've confirmed that his early years were
 24 generally unremarkable, but looking at paragraph 2.12 of
 25 your report, did he display in his later teenage years

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1 some signs of violence?
 2 A. He did, yes, and his mother made the comment that she
 3 was worried that he would kill someone through fighting
 4 one day due to his violent nature.
 5 Q. After leaving school, and I'm now looking from
 6 paragraph 2.15 of your report, did he take a BTEC course
 7 before obtaining employment as a trainee manager with
 8 Woolworths?
 9 A. That's right, yes.
 10 Q. And was it shortly after that that he started having
 11 problems with the police?
 12 A. Yes, he was first arrested, according to police records,
 13 in 1983 for an offence of criminal damage.
 14 Q. May we put on screen {DC7437/12}. Are we now seeing on
 15 screen his Police National Computer printout?
 16 A. Yes, that's true.
 17 Q. And you told us that his first offence was of criminal
 18 damage in 1983, when he was, I think, 19 years old?
 19 A. Yes.
 20 Q. 18 or 19. Thereafter, and looking down the page, when
 21 was his next incident of trouble with the police?
 22 A. In 1988 he was arrested for possessing an offensive
 23 weapon and for using threatening, abusive, insulting
 24 words or behaviour under the Public Order Act.
 25 Q. Between then and his next conviction, did he also have

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1 a problem, an incident of trouble with the police
 2 in April 1989 when he was arrested for assault causing
 3 actual bodily harm?
 4 A. That's correct, yes.
 5 Q. And that was --
 6 A. This was in relation to a dispute on a bus where he
 7 struck someone in the face.
 8 Q. That, I think, was a case that was withdrawn and didn't
 9 go to trial?
 10 A. That's true, yes.
 11 Q. When was his next conviction, which I think we see on
 12 the screen?
 13 A. In 1990, April 1990 for criminal damage and assaulting
 14 a police officer.
 15 Q. In a sentence or so, what were the circumstances of that
 16 offence?
 17 A. He pulled a telephone from a wall in a restaurant and
 18 then subsequently he used his feet to kick out a window
 19 of a vehicle and assault a police officer when they
 20 arrested him.
 21 Q. So in the late 1980s, in summary, he had a number of
 22 convictions, some of them involving violence and one
 23 involving assault on police officers?
 24 A. Yes.
 25 Q. In 1990, and I'm now looking at paragraph 2.22 of your

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1 report, did he begin his first serious relationship with
 2 a lady called Jane Harvey?
 3 A. That's correct, yes. He actually moved in as a lodger
 4 to her home and then began that relationship.
 5 Q. Did they over the following years have two children, two
 6 daughters?
 7 A. Yes, they did.
 8 Q. Those are, I think, his two adult children?
 9 A. Yes.
 10 Q. Early in their relationship, was there a separation as
 11 a result of an incident?
 12 A. That's correct, yes. For around three months, after he
 13 hurt her in an incident.
 14 Q. Did Ms Harvey give you a description of Masood's
 15 character?
 16 A. She did, yes. She said that he would go out drinking
 17 quite regularly. Sorry, yes, she described him as
 18 intelligent, powerful and persuasive with a charming
 19 personality, but also mentioned that he would regularly
 20 go out drinking.
 21 Q. While in the relationship with Jane Harvey, did Masood,
 22 who of course at that time was called Adrian Elms, take
 23 an economics degree from 1994 to 1997?
 24 A. He did, yes, at Falmer University in Brighton.
 25 Q. Did you obtain a description of him from fellow students

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1 or a fellow student there?
 2 A. That's correct, yes. They described him as being
 3 a ladies' man and they also said that he could "handle
 4 himself", was the phrase used.
 5 Q. After taking that degree, did he work with Ms Harvey in
 6 her small business for a period?
 7 A. That's right, yes. This was a business which supplied
 8 cleaning products.
 9 Q. But were there records that you found which showed that
 10 there were continued incidents of violence in the late
 11 1990s involving Masood?
 12 A. Yes, there were. Yes.
 13 Q. Looking at paragraph 2.28 of your report, did you find
 14 in particular an incident in August 1998?
 15 A. Yes, this was an incident where he approached a woman
 16 and told her that he thought she didn't like him because
 17 he was black. She replied it wasn't due to his colour
 18 but it was because of his attitude, and as a result
 19 Masood, is alleged to have spat at her in the face and
 20 punched her, causing some swelling and bleeding.
 21 Q. So we are now in the late 1990s with Masood in his
 22 mid-30s.
 23 A. Yes.
 24 Q. And he has, by this stage, a number of criminal
 25 convictions and a history involving some relatively

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1 minor violence?
 2 A. Yes.
 3 Q. May we now move on to the period from 2000 onwards,
 4 which I think involved some more serious offending on
 5 Masood's part.
 6 A. Yes.
 7 Q. In July of 2000, was there a more serious incident which
 8 you discovered in your investigations?
 9 A. Yes, he was convicted for an offence of wounding that
 10 took place in a car park at a public house in Northiam
 11 in Kent. He was -- the victim was approached by Masood
 12 who spat at him and used a flick knife to injure his
 13 face and as a result of that he was convicted and given
 14 two years' imprisonment.
 15 Q. Is it right that the injury he inflicted with the flick
 16 knife was on a man's face?
 17 A. Yes.
 18 Q. And required as many as 20 stitches to repair?
 19 A. Yes, that's true.
 20 Q. We see, I think, that offence in the bottom half of the
 21 page of the PNC report that's on the screen now?
 22 A. Yes, offence number 4.
 23 Q. Did Masood then serve time in prison for that offence?
 24 A. Yes, he was sentenced to two years in prison,
 25 effectively served a year from July 2000 to July 2001.

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1 Q. Which prisons did he serve his time in?
 2 A. Three prisons, certainly the major period of
 3 imprisonment was at Lewes prison.
 4 Q. I think also Wayland and Ford?
 5 A. Yes.
 6 Q. At that time his name was Adrian Elms; did he declare
 7 a religion for the purpose of his prison records?
 8 A. Not on the first occasion in prison, no.
 9 Q. Did your team take a statement or statements which
 10 indicated that Masood began to develop an interest in
 11 Islam during that first period in prison in 2000 to
 12 2001?
 13 A. Yes, there are some witnesses that have suggested that
 14 and, in fact, other information that we discovered
 15 indicated that he started to take elements of the faith
 16 of Islam during that first period of imprisonment.
 17 Q. Around the time of that first period in prison, 2000 to
 18 2001, did Masood and Ms Harvey separate?
 19 A. Yes, they did. Yes, due to his violent nature and
 20 ongoing domestic abuse.
 21 Q. After he had left her, was there further trouble with
 22 the police in mid-2002 involving an attack on
 23 a girlfriend?
 24 A. That's correct, yes. He was charged with an offence of
 25 causing actual bodily harm to that person, and he was

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1 found guilty of the offence, although he didn't actually
 2 receive a custodial prison sentence. He was given
 3 a Community Punishment Order and paid costs.
 4 Q. We can see that at the bottom of the page, offence 5,
 5 I think.
 6 A. Yes.
 7 Q. If we go over the page, please {DC7437/13} we can see,
 8 as you have told us, that the offence did not result in
 9 a custodial sentence.
 10 I think he was also accused of intimidation of the
 11 complainant, the witness?
 12 A. That's correct, yes.
 13 Q. Was there then a further incident in September 2002
 14 which didn't result in a conviction and which you
 15 address at paragraph 2.33 of your report?
 16 A. That's correct, yes. He was alleged to have approached
 17 a man from behind and hit him over the head with
 18 a glass, causing a laceration to the back of the head,
 19 and then approaching another man at the same venue and
 20 again with a knife, causing lacerations to the face and
 21 elbow. That matter didn't appear in the Police National
 22 Computer record.
 23 Q. It didn't appear, I think, because that incident
 24 in September 2002 didn't lead to a prosecution?
 25 A. That's correct, yes.

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1 Q. However, is it right, from the Sussex Police file, that
 2 the investigating officer suspected that witnesses had
 3 been intimidated?
 4 A. Yes, that's true.
 5 Q. Looking at paragraph 2.34 of your report, did subsequent
 6 inquiries after the attack also reveal a robbery which
 7 Masood had allegedly carried out in 2003?
 8 A. That's correct, yes, in which the victim claimed Masood
 9 had hit him with a cosh. He was arrested and bailed for
 10 this so that advice could be sought of the Crown
 11 Prosecution Service. However, there is no trace on the
 12 PNC record so we can assume that that matter was no
 13 longer proceeded with.
 14 Q. This time, reference to him having used a cosh by
 15 comparison with a knife in the past?
 16 A. Yes.
 17 Q. Was there a further incident in March 2003 which you
 18 address at paragraph 2.35 of your report, involving
 19 Masood using another type of weapon?
 20 A. Yes, again, it's alleged that he pushed a man to the
 21 ground and then used a baton to hit him around the head
 22 and body, resulting in the victim sustaining
 23 a dislocated shoulder and a fractured collar bone and
 24 bruising to the head and body.
 25 Q. So, in short, are we seeing an increasingly regular and

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1 escalating pattern of violent offending or alleged
 2 violent offending over this period?
 3 A. Yes. Yes, we are.
 4 Q. Did this culminate in a very serious incident
 5 in May 2003?
 6 A. Yes, that's correct, yes. There was a violent
 7 altercation which ultimately resulted in him receiving
 8 a second period of imprisonment. He had met a man who
 9 Masood alleged or suggested he was an undercover police
 10 officer. They drove to an address in Eastbourne.
 11 Masood went into the address, and returned with a knife
 12 and attacked this individual. He plunged the knife
 13 through this individual's nose, sending the blade
 14 straight through the palate of the mouth, through the
 15 tongue and the jaw.
 16 Q. I think the Inquest of the victims of the
 17 Westminster Bridge terror attack heard from one of the
 18 investigating officers, a DC Black, that the injury,
 19 which he saw, going through the nose and mouth and into
 20 the jaw, was the worst that he had seen in a substantial
 21 police career?
 22 A. Yes, it was a horrific injury.
 23 Q. Was Masood charged with a number of offences in relation
 24 to that incident?
 25 A. Yes, he was charged with attempted murder, wounding with

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1 intent, and having a bladed weapon in a public place.
 2 He was charged with possession of an offensive weapon
 3 that was found in his vehicle when he was arrested.
 4 Q. Pausing there, may we have on screen {DC7415/12}. We
 5 see here the indictment showing the offences with which
 6 he was charged: attempted murder, wounding with intent,
 7 then over the page {DC7415/13} the two weapons offences.
 8 Did he advance a defence to these charges?
 9 A. Yes, he put forward a defence of self – defence.
 10 Q. What was the result of the trial?
 11 A. He was acquitted of all offences other than the
 12 possession of the offensive weapon matter.
 13 Q. Did he receive a prison sentence?
 14 A. He did, yes.
 15 Q. What was that?
 16 A. Six months' imprisonment. He had already been serving
 17 on remand at that period of time.
 18 Q. We can take that off the screen. So he had served
 19 a period on remand awaiting trial. Was that between May
 20 and December 2003?
 21 A. Yes.
 22 Q. Was that, once again, a period of imprisonment served in
 23 Lewes?
 24 A. That's correct, yes.
 25 Q. Did you receive evidence in your investigation that

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1 during that second time in prison, he resumed his
 2 interest in and practice of Islam?
 3 A. Yes, that's correct. There was various pieces of
 4 evidence that were collected that suggested this, and
 5 also upon being discharged his prison record indicated
 6 that he had shown himself as a Muslim.
 7 Q. Did you discover later communications from Masood to
 8 people he knew suggesting that he had first gained
 9 an interest in Islam in his first period in prison, but
 10 established a full commitment to the faith during that
 11 second period in prison?
 12 A. Yes, there's various pieces of evidence to suggest he
 13 took the religion far more seriously during the second
 14 period of imprisonment, and clearly it certainly changed
 15 his lifestyle upon leaving prison on the second
 16 occasion.
 17 Q. However, again, is there any evidence that Masood
 18 developed any extremist views or was radicalised during
 19 that second period in prison?
 20 A. No, there was no evidence of that at all.
 21 Q. Moving on to the period after he left prison at the end
 22 of 2003, do you have some evidence that he went to work
 23 in Saudi Arabia in that period?
 24 A. We do. We've had various accounts that suggest this,
 25 although we've not been able to find any documentary

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1 evidence of that first visit to Saudi Arabia.
 2 Q. Just to be clear, on this occasion and on all the other
 3 occasions when he went to Saudi Arabia, about which
 4 you'll tell us, was he teaching English as a foreign
 5 language?
 6 A. Yes, that's true.
 7 Q. From mid to late 2004, was Masood living in the Crawley
 8 area?
 9 A. Yes. That's where he moved to.
 10 Q. By this time, of course, he was in his early 40s.
 11 A. Yes.
 12 Q. While living there, did he meet a woman called
 13 Farzana Malik and shortly after meeting, marry her?
 14 A. That's true, yes.
 15 Q. Was the marriage a successful one?
 16 A. No, she described it as a "complete disaster".
 17 Q. Why was that?
 18 A. I believe because of his controlling nature, was how she
 19 described it, and his insistence on her taking on
 20 Islamic traditions wholeheartedly, which she refused to
 21 do.
 22 Q. So by this stage, he had become relatively strict about
 23 religious observances, at least in his own family?
 24 A. Yes.
 25 Q. But did Farzana Malik also say that he would have

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1 good-natured debates with Christian priests who came to
 2 the house?
 3 A. Yes, that's true. Yes.
 4 Q. Looking at paragraph 2.43 of your report, what did
 5 Farzana tell you that Masood had said about his time in
 6 prison?
 7 A. She told us that he had been in prison in relation
 8 to drugs and that he had converted to Islam whilst in
 9 prison, and that he had said that there were people
 10 going round trying to talk to prisoners about religion,
 11 and that's when he had been converted to that faith.
 12 Q. Looking at paragraph 2.45 of your report, can you tell
 13 us how and when the marriage to Farzana ended?
 14 A. After several months she moved to a different part of
 15 the country in early 2005 so she could be near her
 16 friends and move away from Masood.
 17 Q. After that separation, did Masood return for work in
 18 Saudi Arabia?
 19 A. Yes.
 20 Q. Did you find records showing a documented visit to
 21 Saudi Arabia, a brief one, in March 2005?
 22 A. That's right, yes. 3 March 2005 his passport was
 23 stamped at the King Abdul Aziz International Airport in
 24 Saudi Arabia with an exit stamp on 8 March, so just
 25 a short, five-day visit.

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1 Q. Possibly, then, for a job interview or to make
2 arrangements for a longer stay?
3 A. That's what we believe, yes.
4 Q. In May 2005, did Masood, then called Adrian Elms, change
5 his name by deed poll to Khalid Masood?
6 A. Yes, that's true.
7 Q. If we bring up {WS0884/18} we can see, I think, on
8 screen his change of name declaration, dated May 2005.
9 A. Yes.
10 Q. We can take that down now.
11 Did you then discover that Masood had gone to work
12 in Saudi Arabia for a lengthy period from November 2005?
13 A. Yes, until November 2006. He was employed by the
14 Educational Projects and Information Technology Limited
15 company in Saudi Arabia on a year's contract.
16 Q. I think you later, from a number of sources, obtained
17 his CV?
18 A. Yes.
19 Q. If we bring up {WS1656/8} we can see that CV on screen.
20 If we go to the next page {WS1656/9} do we see in the
21 middle of the page recorded a period of one year,
22 from November 2005 to November 2006, working as
23 an English teacher in Jubail or Yanbu, Saudi Arabia?
24 A. Yes, that's true.
25 Q. We can leave that on screen, please. Did you discover

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1 that he had been employed there by an entirely
2 legitimate company teaching English?
3 A. Yes. Yes, that's true.
4 Q. While he was in Saudi Arabia on that occasion was there
5 a notable incident involving his eldest daughter, one of
6 his daughters with Ms Harvey?
7 A. Yes, there was. On the last day before finishing school
8 for the Christmas holidays she was involved in a car
9 accident where she was struck by a van from the side and
10 flung up in the air. She was taken to hospital and was
11 in a coma due to a bleed on the brain. Her mother rang
12 Masood to let him know what had happened.
13 Q. What was his response?
14 A. He said that he wasn't worried and that everything was
15 going to be fine as he was at Hajj, which is the major
16 Muslim pilgrimage, and he was going to pray for her.
17 Q. So a sign during that period he had fully embraced the
18 Islamic faith?
19 A. Yes.
20 Q. And that he was on the major pilgrimage during that time
21 in Saudi Arabia?
22 A. Yes.
23 Q. While working in Saudi Arabia did Masood come into
24 contact with a woman called Rohey Hydara, whom he was
25 later to marry?

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1 A. Yes, in 2006, September 2006.
2 Q. In late 2006, December 2006, did they proceed to marry
3 in England?
4 A. They did, yes, and then they lived in Luton.
5 Q. We see, looking further up the page at his CV, that he
6 worked again in Saudi Arabia during 2007?
7 A. Yes, March to October.
8 Q. You address this at paragraph 2.52 of your statement.
9 Did you confirm from your investigations that he did
10 English as a foreign language teaching for an industrial
11 academy during that time?
12 A. Yes, that's right, yes, and his visa shows that as well,
13 between 19 December 2005 and 28 November 2007.
14 Q. Looking at paragraph 2.52 of your report, did you
15 interview a fellow teacher who knew Masood at the time?
16 A. Yes, that's right, yes.
17 Q. What was his account of Masood, in a sentence or so?
18 A. That he showed no signs of extremist views and they got
19 on well, and he got on well with a variety of people.
20 Q. When Masood returned to the UK at the end of 2007, where
21 did he and Rohey Hydara go to live?
22 A. They lived in Chadwell Heath.
23 Q. Did she give you any information about a significant
24 incident or meeting during that time?
25 A. Yes, she mentioned an occasion when Masood met

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1 an individual who she said she didn't know and they went
2 for a walk in a park. She describes the man as being
3 electronically tagged for a terrorism offence.
4 Q. Is it right to say that the Inquests of the victims of
5 the Westminster attack heard evidence from an MI5
6 officer that over the years before this time, and indeed
7 afterwards, Masood was linked as a contact with a number
8 of people who were later either convicted of terrorism
9 offences or connected with terrorist plots?
10 A. That's true, yes.
11 Q. However, did the witness also give evidence that Masood
12 was never found to be directly involved in
13 attack—planning or actual extremist activity?
14 A. Yes, that's correct.
15 Q. Did Masood return to Saudi Arabia between 2008 and 2009?
16 A. Yes, that's correct, again teaching English as a foreign
17 language, he worked for the General Authority of Civil
18 Aviation.
19 Q. We see that, I think, noted at the top of the page of
20 his CV we are looking at on the screen?
21 A. Yes.
22 Q. After returning to the UK in April 2009, where did
23 Masood live with his family?
24 A. Again, he lived in Luton.
25 Q. Moving to the previous page of the CV, please,

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1 {WS1656/8}, looking at the bottom of that, what work did
 2 he do in Luton?
 3 A. He worked for a company called ELAS, which is a company
 4 that provides English language tuition to foreign
 5 students.
 6 Q. Looking at paragraph 2.54 and following of your report,
 7 did you interview a man who was a fellow teacher with
 8 him at the ELAS school?
 9 A. We did, a man called Craig [O'Donaghue]. They were both
 10 teachers together at the school.
 11 Q. How did he describe Khalid Masood's views and character?
 12 A. He recalled that he was a keen convert to Islam but that
 13 he didn't have any problems with any non-Muslims and
 14 essentially their relationship was based around them
 15 going to the gym together.
 16 Q. During that period while the family was living in Luton
 17 and as you have told us Masood was using a gym, do you
 18 have evidence that he was starting to take steroids
 19 regularly?
 20 A. Yes, there are several witnesses and indeed other
 21 material that indicates that he did take steroids quite
 22 extensively as part of his gym routine, which he was
 23 very, very keen on going to the gym.
 24 Q. During that time in Luton, between 2009 and 2012, were
 25 there difficulties in his marriage with Rohey?

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1 A. There were, yes. She described how he had anger issues
 2 and he would get angry and was controlling, and that
 3 they had many periods of separation.
 4 Q. Did you also receive accounts over this time of Masood
 5 influencing his eldest daughter, one of the daughters
 6 with Ms Harvey, to become a stricter Muslim?
 7 A. Yes, absolutely, and I believe she moved in with him for
 8 a period of time whilst she was at university.
 9 Q. Moving on, in mid-2012, did Masood and his family move
 10 away from Luton to Birmingham?
 11 A. Yes, that's right.
 12 Q. What work did he do there?
 13 A. He set up an English language teaching business called
 14 Iqra ELS, "Iqra" meaning "learn" in Arabic, and ELS,
 15 English Language Services. He essentially worked for
 16 private clients, teaching them English and assisting
 17 them with academic work.
 18 Q. Were there continued difficulties in the marriage with
 19 Rohey over the years from 2012?
 20 A. Yes, there were.
 21 Q. From early 2015, was Masood making plans to return to
 22 work in Saudi Arabia?
 23 A. He was, yes.
 24 Q. What, as far as you could tell, were the reasons why
 25 Masood was making those plans?

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1 A. Again, I think he was expecting to be able to find work
 2 there. He believed that the money was good and they
 3 would be able to move the whole family out to Saudi
 4 Arabia and start a new life out there.
 5 Q. So in early 2015, planning to start a new life with the
 6 family in Saudi Arabia. Looking at paragraph 2.65 and
 7 following of your report, did he make preparations for
 8 that relocation?
 9 A. Yes, in February of 2015 he visited a medical centre
 10 where he received a meningitis vaccination, which we
 11 believe was linked to the application to work in Saudi
 12 Arabia. He then flew out to Saudi Arabia from 3 to
 13 8 March 2015 for a pilgrimage.
 14 Q. Later in 2015, did he purchase a car which he sold in
 15 early 2016?
 16 A. Yes, he sold it to his eldest daughter. Again, citing
 17 that he was intending to move overseas.
 18 Q. Then in May 2016, did he receive an actual job offer for
 19 a post in Saudi Arabia?
 20 A. Yes, via email from Mustafa Derbashi, who works for the
 21 Learning Teaching Centre at King Abdul-Aziz University
 22 offering this job offer from the human resources
 23 department. But it also asked for Masood to get a visa
 24 and send it to the Saudi Arabian Embassy in the UK.
 25 Q. So in May 2016, a little under a year before the attack,

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1 Masood had the job offer for Saudi Arabia, was planning,
 2 as far as you could tell, to go out there --
 3 A. Yes.
 4 Q. -- but needed a visa?
 5 A. Yes.
 6 Q. Looking from paragraph 2.71 of your report, did he go
 7 about considerable efforts to try to get a visa?
 8 A. He did, yes, we've certainly got evidence that he made
 9 12 calls to the Foreign and Commonwealth Office in
 10 connection with this visa application, and we know that
 11 he submitted an application on 31 October 2016.
 12 Q. Looking at {WS0900/198} do we see here that in your
 13 investigations you obtained a visa application which he
 14 completed in December 2016?
 15 A. Yes, that's correct.
 16 Q. Did he have to, in connection with this, obtain a police
 17 certificate which showed his criminal convictions?
 18 A. Yes.
 19 Q. During this application process, in November 2016, did
 20 his wife and younger children, so Rohey Hydara and the
 21 children he had with her, move from Birmingham to East
 22 London while he stayed in Birmingham?
 23 A. Yes. This, we believe, was as a sort of preliminary
 24 exercise prior to him moving to Saudi Arabia. We don't
 25 quite understand the logistics of it, but that's

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1 generally why they moved.
 2 Q. What was the outcome of his application for a visa to
 3 work in Saudi Arabia?
 4 A. It failed, essentially. No visa was ever provided by
 5 the Saudi Arabian Embassy. We don't know quite for
 6 sure, we believe it's because of the criminal record,
 7 but they also stated it could be because the application
 8 was incorrectly submitted. But they no longer have
 9 those records available as to why.
 10 Q. Are you able to explain why Masood was rejected on this
 11 particular occasion, having been accepted on previous
 12 occasions to work in Saudi Arabia?
 13 A. I believe it's in relation to the type of application
 14 that he made. I think on previous occasions he'd
 15 entered on a business visa whereas the rules had changed
 16 and, essentially, he had to apply under a work visa, and
 17 because of that, it needed the criminal record history.
 18 Q. So is this right: by early 2017, Masood's plan to return
 19 to Saudi Arabia and work there again had met a serious
 20 obstacle?
 21 A. It appears so, yes.
 22 Q. Looking at paragraph 2.77 of your report,
 23 in February 2017, mid-February, did Masood meet a man at
 24 a Birmingham mosque called Mr El Farsi?
 25 A. Yes, that's right.

25

1 Q. Did Masood discover that Mr El Farsi had a house in
 2 Morocco and express some interest in travelling to that
 3 country?
 4 A. Yes, it appears he did, yes.
 5 Q. Did you later investigate Mr El Farsi and find out that
 6 their relationship was an entirely innocent one?
 7 A. Absolutely, yes.
 8 Q. So there are some signs in mid-February 2017, as late as
 9 that, that Masood was showing some interest in moving or
 10 travelling to a different Islamic country?
 11 A. Yes.
 12 Q. Do you also have evidence from your inquiries of him
 13 contacting old work colleagues in Saudi Arabia asking
 14 for their advice about getting a job back in Saudi?
 15 A. That's correct, yes.
 16 Q. What were the responses of his colleague or colleagues?
 17 A. The colleague told him that checks were now carried out
 18 on all new teachers and that Masood would not be
 19 acceptable because of his criminal record.
 20 Q. On 20 February 2017, so this is just a month before the
 21 attack, did you discover that Masood e-mailed his CV to
 22 a recruitment agency called Chase Recruitment, which
 23 recruited for jobs in the Middle East?
 24 A. Yes, that's correct.
 25 Q. So still at that stage apparently looking for language

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1 teaching jobs there?
 2 A. Yes, absolutely.
 3 Q. Did Masood's wife also tell you, and the investigation
 4 team, that he had spoken about a plan to go to Morocco
 5 with Mr El Farsi to look for work there?
 6 A. Yes, that is right, and he seemed quite confident that
 7 he would be able to obtain work.
 8 Q. On 7 March 2017, did Masood actually send a text to
 9 Mr El Farsi positing a plan to go to Morocco later
 10 in March?
 11 A. Yes, that's right.
 12 Q. But did Mr El Farsi tell police whether there was any
 13 firm plan to go to Morocco with Masood?
 14 A. There was no plan, according to Mr El Farsi. There was
 15 never a plan to do that.
 16 Q. On the same date as Masood texted Mr El Farsi,
 17 17 March 2017, just 15 days -- sorry, 7 March 2017, just
 18 15 days before the attack, did Masood send an email to
 19 his mother, Janet Ajao, proposing a visit to her?
 20 A. That's correct, yes.
 21 Q. Did he tell her anything about his plans at that time?
 22 A. Are you referring to my report, sir, a particular point?
 23 Q. Well, we can bring up his email, {DC7514/1}. Do we see
 24 here an email which you discovered in your
 25 investigations?

27

1 A. Yes.
 2 Q. Dated 7 March 2017?
 3 A. That's right, yes.
 4 Q. The third paragraph saying that he had been offered
 5 a business opportunity in Morocco as well as the
 6 probability of teaching work out there?
 7 A. Yes.
 8 Q. Now, first of all, was that true at this time?
 9 A. No.
 10 Q. And then he had planned to travel to Morocco soon in
 11 order to check things out. Did he, as far as you know,
 12 have any firm plan to do so?
 13 A. None at all.
 14 Q. But he had on the same day texted Mr El Farsi proposing
 15 such a trip?
 16 A. Yes.
 17 Q. Then in the final sentence of that paragraph, do we see
 18 him in March 2017 proposing a visit to see his mother
 19 and his stepfather?
 20 A. Yes, asking if it was okay to visit on 16 March.
 21 Q. We'll hear a little later that he did, in fact, visit
 22 them at that time?
 23 A. Yes.
 24 Q. We can take that off the screen.
 25 In addition to all your other work, did your team

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1 also investigate Masood's finances in the months before
 2 his death?
 3 A. We did, yes.
 4 Q. What conclusions, in short, did you reach about those?
 5 A. He wasn't a man of particularly good means, however, it
 6 appears he tried to organise his finances prior to this
 7 attack, which we later discovered looked like he was
 8 trying, as, I think, I understand it, part of the Muslim
 9 faith is that he left no debts, but he wasn't a man that
 10 had particular assets.
 11 Q. Did you find that he was in debt and had, before his
 12 death, been failing to keep up payments for utilities,
 13 loans and credit cards?
 14 A. Yes, and he'd certainly been refused a loan application
 15 as well.
 16 Q. As you have told us, in the period immediately before
 17 his death, did he make some efforts to settle debts, as
 18 you discovered from looking at various records?
 19 A. That's correct, yes.
 20 Q. Did you and your colleagues discern a reason for the
 21 sudden efforts shortly before his death to settle his
 22 debts?
 23 A. Yes, as I say, I think it was part of his Muslim faith
 24 so that he didn't leave anything for his dependents.
 25 Q. So part of the faith to settle debts before death?

29

1 A. Yes.
 2 Q. May we move on, now, to his planning and preparation for
 3 the attack, which you deal with from page 21 of your
 4 main report?
 5 A. Yes.
 6 Q. And I'm going to start on 8 March 2017, just after that
 7 email to his mother proposing a visit to her.
 8 A. Yes.
 9 Q. On that date, 8 March, did you find that he carried out
 10 some relevant internet research?
 11 A. Yes, he conducted research into Jeep Renegades, Nissan
 12 X-Trails and all 4x4 vehicles.
 13 Q. Later that day, did he do anything following that
 14 research?
 15 A. Yes, he reserved a Hyundai motor vehicle, index
 16 EK66 RWO, calling Enterprise car hire and completing
 17 a hire agreement online.
 18 Q. What was the initial period he asked to hire that car?
 19 A. The hire was between 16 and 20 March.
 20 Q. On the following day, 9 March 2017, did he make
 21 a significant purchase?
 22 A. Yes, he went to Tesco, which is in Spring Hill in
 23 Birmingham, and bought two kitchen knives, amongst other
 24 items, within the store.
 25 Q. May we bring up on screen {DC7960/4}. Now, do we see

30

1 here a map that's been prepared showing the proximity of
 2 his house where he was living to the Sainsbury's store?
 3 A. Yes.
 4 Q. And then on the top left, images of the kinds of knives
 5 which he bought?
 6 A. Yes.
 7 Q. And then in the bottom right, a still image of his visit
 8 to the store and a copy of his till receipt?
 9 A. That's correct, yes. The receipt we recovered in the
 10 search of his address.
 11 Q. Now, was one of those knives which he purchased likely
 12 to be, or certainly the same type as, one of the knives
 13 used in the attack?
 14 A. Yes, we think so. One was left in the vehicle and the
 15 other was found, certainly an identical type of knife
 16 was found in his possession after he had been shot.
 17 Q. May we bring up {DC7989/98}. Was this the knife which
 18 was found that was used in the attack?
 19 A. Yes.
 20 Q. So one of the knives used in the attack had been
 21 purchased in all likelihood on 9 March?
 22 A. Yes.
 23 Q. But the other knife purchased on that occasion was not
 24 used in the attack; is that right?
 25 A. That's correct, yes, it was left in the vehicle.

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1 Q. If we can move to page 99 of the same document, please
 2 {DC7989/99}, was this the other knife used in the
 3 attack?
 4 A. Yes.
 5 Q. More of a hunting knife than a kitchen knife?
 6 A. That's correct.
 7 Q. And a knife, I think, which Masood, to your knowledge,
 8 had not purchased shortly before?
 9 A. No, we couldn't find out where it had been purchased,
 10 but certainly Masood's wife recalled seeing him with
 11 that knife prior to the death — the last time she saw
 12 him.
 13 Q. We can take that off the screen.
 14 On 10 March 2017, looking at paragraph 7.7 of your
 15 report, did Masood carry out some further internet
 16 searches which attracted your interest?
 17 A. Yes, he did a search on Birmingham Calor Gas Centre and
 18 carried out a Google Maps search on that very location,
 19 near to where he lived. We don't have any evidence he
 20 ever attended that location. Certainly we reviewed CCTV
 21 and spoke to staff at the premises and there is no
 22 evidence that he ever attended.
 23 Q. Did his property or any of his properties contain any
 24 appliances which required Calor Gas?
 25 A. None, no.

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1 Q. So may we make an educated guess that he was considering
2 the use of a gas canister as a weapon?
3 A. That's what we believe, yes.
4 Q. Moving on, also on the same day, 10 March, did Masood
5 telephone the recruitment agency, Chase Recruitment, to
6 follow up his application about jobs in the Middle East?
7 A. Yes.
8 Q. Was he then sent a job description that day?
9 A. Yes.
10 Q. And did he carry out a Skype interview for that post on
11 11 March?
12 A. Yes, that's right.
13 Q. An interview I think arranged to take place by Skype but
14 actually taking place by telephone?
15 A. Yes.
16 Q. So as late as 10 March 2017, it appears that he was
17 doing some work to pursue potential job applications?
18 A. It would appear so, yes.
19 Q. Even though in the preceding days, he had apparently
20 made some of the preparations for the ultimate attack?
21 A. Yes.
22 Q. On 14 March, so a little over a week before the attack,
23 did you discover communications between Masood's eldest
24 daughter, who was devoutly Muslim, and Masood?
25 A. Yes, via Twitter. She sent her a message which said:

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1 "Hiya its Andi, Dad is leaving the country, he's
2 tried to contact u to see u on Friday before he goes.
3 Grandads dying."
4 Q. So that was communication from his eldest daughter to
5 her sister?
6 A. Yes.
7 Q. Suggesting that she had been in contact with Masood?
8 A. Yes.
9 Q. And suggesting that she knew or believed that Masood was
10 leaving the country and was going to make contact with
11 his parents?
12 A. Yes.
13 Q. On 15 March, one week before the attack, did you
14 discover further online searches that Masood was making
15 which were of relevance to the attack?
16 A. Yes, again, in relation to the Hyundai Tucson and
17 looking at YouTube videos of speed tests and crash tests
18 related to that vehicle.
19 Q. Also on that date, do you have evidence that he created,
20 or had created by that time, a significant document?
21 A. Yes, a document we referred to as the jihad document was
22 effectively sent between devices.
23 Q. So if we bring up {DC7960/38}, we see here, I think, the
24 front page of a document running to a number of pages
25 which Masood had prepared by 15 March 2017?

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1 A. That's correct, yes. We don't know how long it had
2 taken him to actually create this document, but
3 certainly, yes, by then.
4 Q. Do we see on the front page of that document a picture
5 of Masood in Mecca on the major pilgrimage
6 in March 2015?
7 A. Yes.
8 Q. Did the document consist, then, of a number of Koranic
9 and other Islamic verses which had been selected by
10 Masood?
11 A. Yes.
12 Q. Had they apparently been selected to justify an attack?
13 A. That's what it would appear to be, yes.
14 Q. Did the document then conclude with a request by Masood
15 to pray for him?
16 A. Yes.
17 Q. At that stage, though, 15 March 2017, do you have any
18 evidence that Masood had sent or shown this document to
19 anybody else?
20 A. None at all, no.
21 Q. You just know that it was sent between two devices he
22 owned?
23 A. That's correct, yes.
24 Q. We can take that off the screen.
25 On 16 March, you've told us that he had reserved

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1 a hire car from that date. Did he go to collect the
2 hire car?
3 A. Yes, at 8.44 in the morning he collected it from
4 Enterprise in Birmingham.
5 Q. We know that it had an initial return date booked of
6 20 March?
7 A. Yes.
8 Q. On that date, 16 March, where did he go in the car?
9 A. He drove immediately from Birmingham to Wales to visit
10 his mother and his stepfather.
11 Q. In a few sentences, what happened during that stay?
12 A. Initially he visited his stepfather in hospital and met
13 his mother there at the same time, and they had a brief
14 conversation again around him supposedly teaching
15 English as a foreign language.
16 He then went back to his mother's home address with
17 her and stayed there the night. Again, I think they
18 discussed the friend who had a property in Morocco.
19 Q. On the following day, 17 March 2017, after spending that
20 night at his mother's house, did he say anything
21 significant to her?
22 A. He did. As they were both leaving, I think one from the
23 back door, one from the front door, he turned to her,
24 and over his shoulder he said:
25 "They'll say I'm a terrorist. I'm not".

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1 Q. What was her reaction to that statement?
 2 A. She didn't react to that because, as I've said, she was
 3 literally shutting the door and leaving the house.
 4 Q. That morning, 17 March, where did Masood go?
 5 A. He drove to Brighton and checked in at the Preston Park
 6 Hotel.
 7 Q. May we bring up {DC7960/8}. I'm sorry, I think it's the
 8 next page {DC7960/9}. Sorry, next page {DC7960/10}.
 9 Yes. Did you identify both where he had stayed and
 10 obtain the guest registration document as we see?
 11 A. Yes, you can see that there.
 12 Q. Did he check out the following morning, 18 March?
 13 A. Yes, he did, and he made his way to London.
 14 Q. Where did he go once in London that day?
 15 A. Well, we've got CCTV that shows him crossing
 16 Westminster Bridge at 12.44.
 17 Q. May we bring up {DC7960/13}, page 13 of this document.
 18 Using ANPR cameras, were you able to track his journey
 19 from Brighton to London?
 20 A. Yes, you can see that from this map, yes, the journey he
 21 took.
 22 Q. Then {DC7960/15}, were you also able to track his
 23 movements in Central London?
 24 A. Yes, as you can see, he crossed Westminster Bridge, as
 25 I say, at 12.44. We know that he drove around

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1 Parliament Square, down Victoria Street, and then did
 2 a U-turn before returning on the same way back, again,
 3 back across Westminster Bridge, returning back across
 4 Westminster Bridge at 12.52.
 5 Q. As far as you can tell, using all your knowledge of the
 6 case, what was the purpose of this journey?
 7 A. We believe this was his first reconnaissance trip.
 8 Q. So crossing Westminster Bridge and going around
 9 Parliament Square?
 10 A. Yes.
 11 Q. We can take that off the screen now.
 12 From London, where did he travel?
 13 A. He then went to Cobham and stayed in a hotel at Cobham
 14 services.
 15 Q. That, I think, was a Welcome Break hotel?
 16 A. A Welcome Break hotel, yes.
 17 Q. After arriving there on 18 March, did he extend his stay
 18 for another day on 19 March?
 19 A. Yes, he did.
 20 Q. In the early hours of 20 March, so still at that hotel,
 21 two days before the attack, did his internet activity
 22 show up a number of significant results?
 23 A. Yes, it identified that he'd been watching a number of
 24 videos of Isis and other terrorist attacks on the
 25 internet.

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1 Q. Did he remain in Cobham during 20 March?
 2 A. He did, yes.
 3 Q. We know his hire car rental ran out that day, 20 March;
 4 did he extend it?
 5 A. Yes, he just extended it for another -- one day.
 6 Q. On 21 March, so the day before the attack, did he extend
 7 the rental for another day?
 8 A. He did, yes.
 9 Q. Where did he go that day?
 10 A. He returned to Brighton.
 11 Q. So he returned to Brighton, going from Cobham to
 12 Brighton. Did he stay in Brighton that night?
 13 A. Yes, again, at the Preston Park Hotel.
 14 Q. May we bring up {DC7960/22}. I think you were able to
 15 track his movements again to Brighton that day?
 16 A. That's correct, yes.
 17 Q. You also obtained the visitor book from the hotel where
 18 he stayed, the Preston Park Hotel?
 19 A. Yes.
 20 Q. And you saw, I think, which we see in the entry, that
 21 the staff had described him as a "walk-in", and a "nice
 22 man"?
 23 A. Yes.
 24 Q. We can take that off the screen.
 25 In the evening of 21 March, so the evening before

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1 the attack, did he have a video call with his family?
 2 A. Yes, with his children.
 3 Q. Did he also have a call with his eldest daughter, which
 4 lasted some time?
 5 A. He did, yes, that's right.
 6 Q. What did she think were his plans at that stage?
 7 A. Well, again, they thought that he was planning to go to
 8 Morocco. His younger children, by the way, just to be
 9 clear. Not his grown-up children, his younger children.
 10 Q. Well, let's take this in stages. I think he had a video
 11 call with his wife and younger children.
 12 A. Yes.
 13 Q. So Rohey Hydera and her children. Did he also that
 14 evening have a telephone call with his eldest daughter,
 15 one of his children with Ms Harvey?
 16 A. Yes, that's right.
 17 Q. What did she think that his plans were?
 18 A. Again, she thought that he was going to go to Morocco.
 19 Q. What did she consider the call was about after the
 20 attack had taken place?
 21 A. She realised that, in fact, it was his way of saying
 22 goodbye to her.
 23 Q. Moving now, to the day of the attack, in the early
 24 hours of that day, were there further internet searches
 25 you found that Masood had carried out?

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1 A. Yes, he researched Prime Minister's Question Time, and
 2 also "Vehicle-borne improvised explosive devices" on the
 3 internet.
 4 Q. What did he do that morning?
 5 A. He left the hotel and he drove back to London again, and
 6 again, carried out what I believe to be a reconnaissance
 7 exercise, crossing over Westminster Bridge at 10.30 in
 8 the morning.
 9 Q. May we bring on screen {DC7960/28}. Using CCTV camera
 10 footage from the area of Westminster, were you able to
 11 track very precisely his movements around 10.30 that
 12 morning, carrying out what you believe was his final
 13 reconnaissance visit?
 14 A. Yes, on this occasion, as I say, he crossed
 15 Westminster Bridge, he followed the same route that he
 16 initially had, previously on the 18th, going around
 17 Parliament Square and down Victoria Street.
 18 We don't know precisely where he turned around on
 19 Victoria Street on this occasion, but we know that he
 20 then went back the same route. However, the difference
 21 on this occasion was he again went around
 22 Parliament Square but then turned down Whitehall.
 23 Again, got down to Whitehall Place, again, we don't know
 24 precisely where he turned around, but we know that he
 25 then again returned along Whitehall and then went back

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1 across the bridge.
 2 Q. It was suggested to you during the Inquests of the
 3 victims that his reason for travelling down Whitehall
 4 may have been to look at the security at Downing Street,
 5 and that that might have had a connection with his
 6 internet searches on Prime Minister's Questions. Did
 7 you have any views on that hypothesis?
 8 A. It could possibly be. It's very difficult to say
 9 because there's only one man that knew the whole plan,
 10 which was Masood.
 11 Q. Having carried out that final circuit around
 12 Westminster, was he then picked up on a camera on the A3
 13 in South London, travelling south shortly after
 14 11.00 am?
 15 A. That's correct. 11.18.
 16 Q. When was he next picked up by a camera?
 17 A. At 1.52 in the afternoon was the next occasion we picked
 18 him up, again, travelling northbound on this occasion,
 19 at Clapham Road.
 20 Q. We can take the image off the screen now.
 21 Did he seek to extend his hire car period for any
 22 period at that point?
 23 A. Yes, the hire company actually called him and asked him
 24 to return the car. Masood asked to extend it for
 25 another day, using the deposit he had provided, but they

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1 refused and they asked him to return the vehicle.
 2 Q. After being picked up on the camera at 1.52 that
 3 afternoon, where did he go?
 4 A. He drove into St Thomas' Hospital car park where he
 5 spent a period of time.
 6 Q. Now, is it right that you obtained footage from
 7 St Thomas' Hospital car park which placed him there
 8 between 14.04, so 2.04, and 14.36?
 9 A. Yes.
 10 Q. So leaving there around four minutes before the attack
 11 actually began?
 12 A. Yes.
 13 Q. And just a couple of minutes before he was picked up in
 14 the bus lane on camera about to begin the attack?
 15 A. Yes.
 16 Q. At 14.26 and 14.29, did he send a number of electronic
 17 messages?
 18 A. Yes, again, the document we referred to as the jihad
 19 document, that's the one he sent out to -- I believe it
 20 is 39 people who were -- we considered to be completely
 21 random people from within his contacts on his phone.
 22 Q. Did he send that document to his wife, Rohey?
 23 A. Yes, he did.
 24 Q. May we go to {WS12871/55}. May we see at the top of the
 25 page two entries showing communications she sent back to

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1 him?
 2 A. Yes.
 3 Q. 14.32:
 4 "I need to speak with you urgently. I called u
 5 earlier today."
 6 A. Yes.
 7 Q. And 14.51:
 8 "What is this that you sent me?"
 9 A. Yes, she's referring to that jihad document.
 10 Q. Did Rohey Hydera give evidence in the Inquests of the
 11 victims that she had no idea what Masood was planning
 12 and that that final message showed her confusion at the
 13 message she had received?
 14 A. Yes, that's correct.
 15 Q. You can take that off the screen now.
 16 So we are about to begin playing a video --
 17 THE CHIEF CORONER: Yes.
 18 MR HOUGH: -- a compilation of clips showing preparatory and
 19 planning stages. Would that be a convenient moment for
 20 a mid-morning break?
 21 THE CHIEF CORONER: We'll take our mid-morning break there,
 22 Mr Hough.
 23 Members of the jury, we will take a break and sit
 24 again, please, in 10 minutes' time.
 25 (11.22 am)

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1 (A short break)
 2 (11.43 am)
 3 (In the presence of the jury)
 4 MR HOUGH: Mr Brown, we're now going to look, with your
 5 assistance, at a compilation video containing various
 6 clips from CCTV footage showing Masood's preparations
 7 for the attack. This is footage which you and your team
 8 recovered in your extensive investigations?
 9 A. Yes.
 10 Q. Play on, please.
 11 (Video played in court)
 12 We are now looking at a camera from Tesco in
 13 Birmingham on 9 March, the day Masood bought the knives?
 14 A. Yes.
 15 Q. We see him ringed on the entrance escalator?
 16 A. Yes, that's correct.
 17 Q. Further clips will show him with a trolley in the store,
 18 again identified at various points?
 19 A. That's correct.
 20 Q. We now see him approaching the till.
 21 A. Yes.
 22 Q. This is the visit when he bought the knives?
 23 A. Yes.
 24 Q. Finally, in this section we are seeing footage of him
 25 leaving the store with his purchases?

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1 A. Yes.
 2 Q. In this section we see a clip, footage from Enterprise
 3 Rent-a-Car in Birmingham on 16 March; is that right?
 4 A. Yes, that's right.
 5 Q. Showing Masood hiring the Hyundai Tucson he was to use
 6 in the attack?
 7 A. Yes.
 8 Q. And discussing the car, evidently, with a salesperson
 9 from the store before collecting the keys, as we will
 10 see.
 11 A. Yes.
 12 Q. Pause here a second.
 13 This is a section showing some footage on 18 March,
 14 the day when you believe Masood was carrying out further
 15 reconnaissance, when he certainly went across
 16 Westminster Bridge in both directions?
 17 A. Yes, that's right, the first occasion, yes.
 18 Q. And we start with a camera mounted on the St Thomas'
 19 side of the bridge, and we'll see Masood's car driving
 20 over the bridge, and it will be identified.
 21 A. Yes.
 22 Q. Play on, please.
 23 Now the car identified from a camera on the north
 24 bank side. Then the same camera showing the car
 25 returning across the bridge?

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1 A. That's right.
 2 Q. Then the St Thomas' Hospital camera, again, showing the
 3 car at the south bank side of the bridge, having
 4 completed the reconnaissance?
 5 A. Yes.
 6 Q. We'll see over the following clips a number of pieces of
 7 footage of Masood at the reception desk of the Days Inn
 8 Welcome Break hotel in Cobham.
 9 A. Yes.
 10 Q. We'll see the apparently normal way in which he
 11 interacts with the staff?
 12 A. That's right, yes.
 13 Q. A number of these clips show, I think, card payments
 14 with him making or extending his stay?
 15 A. Yes.
 16 Q. These images also, I think, give us an idea of Masood's
 17 body build.
 18 A. A very large man, yes.
 19 Q. We're now, I think, seeing him checking out, and the
 20 various bags he is carrying?
 21 A. Yes.
 22 Q. And you believe, I think, is this right, that the bags
 23 that he had with him at that time contained some of the
 24 paraphernalia for the attack?
 25 A. Yes.

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1 Q. We're now looking, I think, at footage on 21 March, the
 2 day before the attack, in the early afternoon, showing
 3 Masood in a Sainsbury's in Brighton?
 4 A. That's correct, yes.
 5 Q. So confirming his presence in Brighton by that early
 6 afternoon.
 7 A. Yes.
 8 Q. Finally, before the day of the attack, we're now looking
 9 at footage on the evening of 21 March, shortly before
 10 9.00 pm, with Masood going into a fish and chip
 11 restaurant, a fish and chip takeaway, to get some food
 12 that evening?
 13 A. Yes, that's right.
 14 Q. Now we're looking at footage of the Hyundai going across
 15 Westminster Bridge and back at 10.30 in the morning of
 16 the day of the attack?
 17 A. Yes, that's right.
 18 Q. What you've described as the final reconnaissance?
 19 A. Yes.
 20 Q. First of all footage from the St Thomas' side with the
 21 vehicle going north across the bridge?
 22 A. That's correct.
 23 Q. Then footage from the north bank side with the vehicle
 24 reaching that side of the bridge?
 25 A. Yes.

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1 Q. Footage again from the north bank side once the vehicle
2 has turned around and is going back across the bridge?
3 A. Yes.
4 Q. Footage from the south bank side showing the vehicle
5 having completed that circuit .
6 A. That's correct.
7 Q. We now see that afternoon, footage from
8 St Thomas' Hospital with the Hyundai coming into the car
9 park of the hospital, time given at 13.59, but I think
10 the actual time is 14.04.
11 A. Yes, that's correct, yes.
12 Q. So the car is driven into the car park at that time. Is
13 this footage from a further camera showing the vehicle
14 further into the car park area?
15 A. Yes.
16 Q. This camera, I think, is four minutes slow, so we're
17 looking at a time of 14.05 in reality?
18 A. Yes.
19 Q. Then the vehicle is out of shot for a period, before
20 coming back into view at 14.30 real time?
21 A. That's right, yes.
22 Q. Then the camera near the entrance area to the car park
23 showing the vehicle at 14.31?
24 A. Yes.
25 Q. That's the real time, or corrected time. The vehicle

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1 has come back further into the car park at that time?
2 A. Yes.
3 Q. It does a three-point turn and is stationary for a short
4 period.
5 A. Yes.
6 Q. Is that the period when you consider some of the
7 messages were sent with the jihad document attached to
8 them?
9 A. I think that's highly likely, yes.
10 I think we just saw the vehicle on the top.
11 MR HOUGH: Pause there.
12 THE CHIEF CORONER: So 14.36 I think is when we see it going
13 past what is the entrance to the car park?
14 A. That's correct, sir, yes.
15 MR HOUGH: 14.31 on the camera, but 14.36 real time, the car
16 leaves St Thomas' Hospital and we'll just see in
17 a moment at 14.38, two minutes later, the car parked in
18 the bus lane about to start the attack?
19 A. That's correct.
20 Q. Play on, please. This is the view from a camera on the
21 front of the bus, and do we see it showing there the
22 Hyundai parked at the start of the bus lane?
23 A. Yes.
24 Q. We can take that video off the screen now, please.
25 Then a little under two minutes later, after that,

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1 the attack begins, as shown in the previous video we
2 watched with Mr Crossley.
3 A. Yes, sir .
4 Q. Just finally to confirm this: in all your investigations
5 that you have described to us about the background of
6 Masood and the planning and preparation of the attack,
7 did you establish whether or not anyone else other than
8 Masood had been involved in the planning, preparation or
9 execution of this attack?
10 A. We found no evidence whatsoever to suggest anyone else
11 was involved in any aspect of the attack .
12 Q. Did you establish whether anyone else had even known of
13 the attack in advance?
14 A. Again, we have no evidence to suggest anyone knew of the
15 attack .
16 Q. That despite the huge amount of work that went into
17 obtaining all the information that you have summarised
18 to us today?
19 A. That's correct, yes.
20 MR HOUGH: Mr Brown, those are all my questions. It may or
21 may not be that others will have some questions for you.
22 A. Yes, sir, thank you.
23 MR KEITH: I have no questions, thank you.
24 MR HOUGH: No other advocate does have any questions for
25 you, thank you very much for giving evidence.

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1 A. Thank you, sir .
2 THE CHIEF CORONER: DCI Brown, it is obvious that you are
3 giving evidence on behalf of really quite a large team
4 who have been responsible for investigating, and you
5 have taken myself and the jury through the planning
6 stage and the investigations about Mr Masood, his
7 background, and all the details. It is obvious to me
8 there's an awful lot of work that's gone in from a very
9 large team.
10 A. Yes, absolutely.
11 THE CHIEF CORONER: So if you could thank them all on my
12 behalf for what they have done.
13 A. I will do, sir, thank you.
14 MR HOUGH: Sir, the final witness giving evidence for
15 a formal purpose is Mr Crossley again.
16 THE CHIEF CORONER: Yes.
17 DS JOHN CROSSLEY (Recalled)
18 Examination by MR HOUGH QC
19 MR HOUGH: Mr Crossley has given evidence already, he is
20 still on oath.
21 THE CHIEF CORONER: Yes, you needn't retake the oath.
22 Thank you.
23 A. Thank you.
24 MR HOUGH: Mr Crossley, you've already told us that you are
25 the senior investigating officer of Operation Classific ?

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1 A. That's correct, sir.
 2 Q. You are giving evidence at the end of this Inquest to
 3 confirm the personal particulars of Khalid Masood
 4 required to complete a record of Inquest?
 5 A. That's correct, sir.
 6 Q. Can you tell us first of all the formal date and place
 7 of death?
 8 A. The formal date and place of death was on 22 March at
 9 St Mary's Hospital.
 10 Q. And I think that's Praed Street, Westminster?
 11 A. That's correct, sir, yes.
 12 Q. Can you give us the date and place of birth, which
 13 I think we've already heard from Mr Brown today?
 14 A. Yes, Mr Masood was born on 25 December 1964 in Erith in
 15 Kent.
 16 Q. Finally, his occupation and usual address for the
 17 purposes of the record of Inquest.
 18 A. He was an English teacher and his address was 165A,
 19 Hagley Road, Birmingham.
 20 MR HOUGH: Thank you very much, Mr Crossley. Those are all
 21 my questions. I don't imagine that others have any
 22 questions for you.
 23 MR KEITH: No, thank you.
 24 MR HOUGH: Thank you very much.
 25 A. Thank you.

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1 THE CHIEF CORONER: Thank you very much.
 2 MR HOUGH: Sir, that is all the evidence for the jury.
 3 THE CHIEF CORONER: Yes.
 4 MR HOUGH: I believe you will have a summing-up for them in
 5 due course.
 6 THE CHIEF CORONER: Yes, Mr Hough, again, there are just
 7 a couple of matters of law that I want to discuss with
 8 you and the other interested persons which we'll do in
 9 a moment. What I'm going to suggest is rather than keep
 10 the jury waiting, I think the sensible thing is that we
 11 have a clean start tomorrow morning with my summing-up,
 12 it will give me a chance just to complete it.
 13 And as I mentioned yesterday in answer to the
 14 question that one of you posed, I'm intending to give
 15 you a summary of the evidence you have listened to very
 16 attentively during the course of this Inquest, but place
 17 particular emphasis on the key parts of the evidence
 18 that are relevant, as it were, to your determinations in
 19 due course.
 20 It may or may not be obvious to you, but I have had
 21 one or two IT issues, not of my own making, I hasten to
 22 add, during the course, so we're going to do that
 23 tomorrow morning rather than me delay you this
 24 afternoon.
 25 Could I ask you, please, to be back here for

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1 10 o'clock tomorrow morning and I will then deliver my
 2 summing-up to you. I'm going to give you some written
 3 legal directions, so you will have those as well, which
 4 I hope will help you when you come to retire.
 5 So I look forward to seeing you, please, tomorrow
 6 morning for 10.00. Thank you.
 7 (In the absence of the jury)
 8 MR HOUGH: Sir, before I address you on matters of law, may
 9 I ask that you make an order under section 4(2) of the
 10 Contempt of Court Act 1981 providing that any
 11 publication of the legal argument which follows in the
 12 short space of time from now is deferred pending the
 13 jury's determination?
 14 THE CHIEF CORONER: Yes.
 15 MR HOUGH: The reason being that the jury should not be
 16 reading what lawyers have said about what the
 17 determinations can and can't be --
 18 THE CHIEF CORONER: Yes.
 19 MR HOUGH: -- as that may prejudice their deliberations.
 20 THE CHIEF CORONER: It seems to me, Mr Hough, a very
 21 sensible application, and I will make that order.
 22 I'm sure the people and the press present in court
 23 understand the reasons for it: it is simply delaying the
 24 publication, there will be no difficulty in reporting
 25 it, but at the conclusion of the Inquest, rather than

55

1 now.
 2 MR HOUGH: Yes, and the transcript which will go up on the
 3 website will not include this part of the hearing
 4 initially.
 5 THE CHIEF CORONER: Thank you.

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