

The logo consists of the words "SHEKU", "BAYOH", and "INQUIRY" stacked vertically in a bold, white, sans-serif font against a black square background.

The Sheku Bayoh Public Inquiry

Witness Statement

Alison Marven

**Taken by [REDACTED] by MS Teams
On Thursday 7 April 2022**

Witness details and professional background

1. My full name is Alison Marven. I was born in 1974. My contact details are known to the Inquiry.
2. I work at the Scottish Police Authority Forensic Services Laboratory based at the Scottish Crime Campus in [REDACTED]
3. My qualifications are a BSc Honours in Forensic and Analytical Chemistry from University of Strathclyde, studying from 1992 to 1997.
4. I have been working as a Forensic Scientist with the organisation currently known as SPA since 2002. I work in the department currently named the "Chemistry and Documents" Team. Prior to this I worked in the private sector including for pharmaceutical companies doing analytical work.
5. I've been asked what areas I cover in my role. My role includes cases which may involve examination of footwear marks/impressions,

Signature of witness..... [REDACTED]

toolmarks/impressions, glass, accelerants, firearms discharge residue and tyre marks/impressions. I don't do tyre examinations in relation to accidents.

6. At the time of the examination in 2015 I did paint examinations. I don't currently do paint examinations just because I have been concentrating on other examination types and am working towards regaining my paint competency. It's not that I was stopped from doing it, it is just that due to the number of cases there were, a fewer number of people concentrated on them and I was concentrating on other case types. There was more of the firearm discharge residue cases to be done so I was doing more of that test type than paint.
7. In a marks comparison we're looking at any mark that could be transferred from another item. If a vest or an item of clothing had a footwear or tyre mark on it then those examinations would be included in that description. You're looking at marks, you're looking to see if there is a pattern that you can see, you're looking to see if there's anything recognisable on the garment that you could use to do a comparison with something.
8. I've been asked to clarify what I mean by tool mark comparison. For example, a screwdriver, a hammer, an object that's used to do something else. It might be that it's a crowbar that's been used to prise open a door or prise open a window. If a tool slipped when it was being used and it took a big gouge out for example then you could see the trace of that. It could be a padlock that has been cut so it could be bolt cutters and a cut padlock that is being examined. The tool has left a mark or impression on another object during its use and we would examine and compare these to see if the tool and mark or impression could be related.
9. I've been asked if "tool" includes weapons. I would say it depends on the context of the case but yes it could. We were asked to look and see if the

Signature of witness..........

knife could've made the marks or impressions on the vehicle so that is something that would be covered under a tool mark examination.

10. I've basically been doing the same job role, job title, job level since I started in SPA. What has changed is different modules, for want of a better word, are now included. Different areas of competence have been added.
11. So initially maybe you start training in accelerants or footwear, for example, and then expand to include other areas. I have added on firearms discharge residue, glass, paint, tool marks and now I am part of the on-call out-of-hours rota for attending scenes. Initially I would have gone to scenes as a trainee and I wouldn't have gone to those on my own until I'd been signed off as being able to do that. I haven't been promoted as such as it was all training stages for the current role that I am doing.
12. I look at different items that are submitted to the laboratory. I may attend strategy meetings, I'll examine the items and I'll produce a report if that is required. I can go to court to give evidence, I can attend scenes to take samples or I can be contacted to give advice. That's the main things that I would do in my role. Different test types may be involved in a case and I would liaise with colleagues for these especially for work in the lab. We have corroboration so any work in the lab will have at least two people on a case.
13. In this case, you've got reports signed by various combinations of people, and that's because of what parts of the techniques that they do. I think the tool mark one is signed by myself and Ruth Ramage because Ruth does tool marks or did tool marks at that point, but Shirley Chin didn't. So depending on what the examination type is will depend on who you're working with. I still work with Shirley Chin and prepare reports with her.

Signature of witness..... 

Background information

- 14. My first involvement was a request to attend at the locus in a car yard, the Police must have requested somebody to attend to examine the vehicle. I went to examine the vehicle. I can't remember the name of the garage off the top of my head.

- 15. I was given some background information at the time of the request and I was given information at the scene by the Police Officer that was there. I know it was just a very quick breakdown of the circumstances. There had been a party, or people were at a house to watch a boxing match, and people had been drinking and it was late at night, there was a dispute between two friends, one of which would be Sheku Bayoh and the other one I can't remember his name. Somebody had alleged that Sheku Bayoh had lashed out with a knife at his car as he had driven away.

- 16. Then we were told that there had been an arrest in Hayfield Road where an incident had happened and that the car belonging to the friend had been recovered and I was asked to have a look at the car. So that was the vague background that that we had to it at the initial time.

- 17. As things progressed, there would've been more information coming through, and that's why we'd been asked to look at the vest because I think there was questions over how the arrest had taken place and what procedures were used. But we wouldn't know what an arrest procedure normally was.

- 18. We knew that a Police Officer had been injured. Part of our instructions says: *"PC Nicole Short's body armour to be examined for possible footprint. Any footprint found to be compared with deceased's footwear which was seized at Victoria Royal Infirmary, Kirkcaldy at the time of the recovery of the body."*

Signature of witness..........

19. In our report we've just put that a female police officer was injured during the incident and we were asked to examine items in relation to the incident. On page 6 of the report dated 24 August 2015 (COPFS-00114): *"A female Police Officer was also injured during the incident. Articles in relation to this incident have been submitted to the laboratory for further examination."*

Instructions

20. The instructions were in submission forms from a DSI William Little from PIRC. It's PIRC paperwork that we have. That was submitted on 14 May 2015. There were lots of items listed that were for other sections as well - there was the paint samples I'd taken, there was some knives, footwear, the vest and a bit of background information. The background information is saying *"About 0715 hrs Police Scotland received a number of telephone calls reporting a black male (now deceased Sheku BAYOU DOB [REDACTED] 83) walking with a knife on Hayfield Road, Kirkcaldy, A numbers of uniformed and plain clothes officers attended the locus where on seeing them, BAYOU allegedly punched and kicked one of the officers (Nicole Short) on the head and body. A struggle then ensued between police officers and Sheku Bayou. Witnesses later observed the deceased was lying on his back with police officers performing CPR. A knife was recovered close to the locus which may have been in the possession of Sheku BAYOU at some point during this incident. It is alleged that this knife came into contact with a white Seat m/v regd no [REDACTED] and was used in a threatening manner towards members of the public. A dwelling house, believed to be the home of Sheku BAYOU at [REDACTED] Arran Crescent, Kirkcaldy, Fife was subsequently searched by Police Scotland and various [REDACTED] and other items including kitchen knives, were seized as productions."*
21. And then it goes on to say *"The following items require to be examined"* There were items that went just to Biology; a radio from a Police Officer I think.

Signature of witness.....

Knives went to MEL, paint samples came to Chemistry and some tablets and [REDACTED] went to the Drug's section.

- 22. We were asked "*Please examine this vest to establish if any foot impressions are visible or exist and if so compare with deceased footwear (Production 166/167). Also establish if there has been any forensic interaction between the deceased boot and the vest*". We were looking to see if there was any transfer of dirt or something between them but really what that meant was we were looking for footwear marks in that instance.

- 23. And we were asked; "*Please note all productions are required to be photographed prior to examination*". The vest came to us via Biology was my understanding. I think they looked at it first because if they were looking for DNA or other Biological material on the vest then that would be the examination order. It's not marked as being requested for DNA examination but I'm sure we had it after. In Shirley's notes it actually says "*Prior examination by Biology*" so Biology had had the vest before us.

- 24. Their examination wouldn't have compromised ours, but we could've potentially compromised theirs unless we'd done it in a DNA-free environment. That's why they would look at the items first.

- 25. I don't believe we had any other request to look at the vest. The first report, I think, had the vest examination and a comparison of the different knives that Shirley and I did, and the paint part of it. By the "first report", I mean the one dated 24 of August 2015 (COPFS-00114) which is the one that was done by me and Shirley Chin. Then SPA were requested to produce a tool mark comparison report, so that would be the one that myself and Ruth Ramage did.

Signature of witness.....[REDACTED].....

Car yard locus

- 26. When I'd been at the scene I didn't think the damage marks/impressions on the vehicle were going to be particularly good for doing a comparison with. With very little detail within them I would consider them to have insufficient detail for a meaningful comparison. Sometimes it's easier to take the sample and assess it afterwards so that an opportunity isn't lost. As I needed to take a sample of the paint from near the damaged area I had to record the damage before I could take a paint sample.

- 27. I cast the damaged area with the tool mark casting material at the scene, but really I was of the opinion there probably wasn't very much, if anything, I could do with them or that could be done with them, but it at least would capture the information before I took the paint samples. I think that because we had taken the casts, they (PIRC) obviously wanted a record that we had looked at them and wanted a proper report to record the examination so that's why that report was produced.

Forensic process

- 28. I have been asked what is the process of my forensic examination and whether we work separately or together. So we both do our independent checks. We may look at things at the same time or we may do it separately, but we make up our own mind. I know when we looked at the vest under the different light sources, we would've done that together. You would discuss things after you'd make your own decision.

- 29. Sometimes one person will be moving the garment underneath the VSC, which is the visual spectral comparator, which is just the different light sources. One person becomes the person that's touching the production and one person's writing the notes so that there's not somebody touching the item,

Signature of witness..... 

then touching pens and touching the file, but you're both seeing it on screen, so it's not like one person's seen something and the other person hasn't.

- 30. It's a little bit difficult to describe the comparison process using this case because there was no obvious footwear mark that needed a comparison done between it and the footwear. Although there wasn't really any obvious comparison to take place we would both have still looked at the vest to see if we thought there was anything there.
- 31. Shirley's written the first lot of notes and then I've added bits in, which is just my own observations, and I think that's because there wasn't an awful lot there but I wanted to record what was seen.

Vest

- 32. Biology had already looked at the vest. So we'd taken all the label details down and Shirley's written a general note that there was a *"padded police vest with hi-vis outer layer, shoulder badge [REDACTED] An "LED LENSER" torch + a leather strap with buckle were also in the evidence bag."*
- 33. We've got that the *"front left black pocket of the vest has light-coloured markings on the surface, could be dirt rubbed on the surface?"*. Shirley's put: *"Or part of a mark. Pocket contained latex gloves."* Sometimes the gloves have a bit of a powdery residue, so it could be that it's just from people putting hands in and out. *"Front right black vest pocket has similar discolouration/staining on surface,"* and the pocket was empty. *"Light-coloured staining was noted near the neckline/shoulder area"* – we thought that was possibly makeup, just because of where it was.
- 34. *"Areas of dark staining noted on the back of the hi-vis layer below "POLICE" badge"*. Then I have written, *"Marks on the jacket possibly included a triangle. Possible that this is one of the elements from the shoes of the deceased but*

Signature of witness..... [REDACTED]

there is really insufficient detail/resolution of marks for any meaningful comparison."

- 35. The vest was examined under different light sources, that's the VSC, and nothing additional was shown up. Sometimes when we look at items, depending on the colour of them, depending on what the mark has been made with, we can get more detail. It's not that we we're making marks, we're just changing the contrast between the mark and the background. We didn't get any additional marks visualised with that examination.

- 36. We then forwarded the vest to the Mark Enhancement Lab (MEL) for treatment, for whatever they were asked to do with it and then we would re-examine if anything else was observed. When we spoke to MEL they hadn't got any additional marks visualised so we didn't examine the vest any further after that.

Shape of mark

- 37. We don't have a photo of the mark in the file. Looking at the soles of the shoe, there's different pattern elements within that. There are small triangles and there's slightly different shaped blocks.

- 38. When we've looked at the outer layer of the vest, there's obviously been a slightly darker mark, which may or may not have been a triangle shape, so a possible triangle shape. Sometimes if it's just one element or shape on its own, from what I'm reading there, "*possibly included a triangle.*" Sometimes you get marks on an item of clothing that's flexible material because there's folds in the fabric when the mark has been made. So there might be a scuff, but when it's straightened out, you see it straightened out, you get a gap down the middle between the edges of it. It might look like a triangle at that shape, but it wasn't a triangle when the mark was made.

Signature of witness..... 

- 39. So I think we've got that there's possibly a shape there, but one shape would never usually be enough to do a comparison with and because it was a very, very partial mark or markings on it, it could just be from scuffs. We can't say when it got there, how long it's been there for, how it got there. It can just be that the folds in the clothes contacted against something dirty, that it's come from somewhere else and there just wasn't enough information in the bits of marks on the hi-vis jacket for us to be able to do a comparison, a proper comparison, with any item of footwear.

- 40. In our notes we haven't noted the size, but we have just said there's really insufficient detail to even know that it is a mark from the shoes. It's just that there's a possibility of a triangle that's there, but we would have looked with the overlay at the time, but because there wasn't enough to do a proper comparison with, because there's insufficient detail in there, we wouldn't be able to relate that definitively back to that shoe.

- 41. So we take lifts from the soles of the shoes that we're examining. I've got copies of the lifts. They're put onto acetate sheets so that they're see-through but the pattern's there, and we would overlay that acetate onto a mark. If we're doing a comparison, we might have a photograph or a gel lift on an item of clothing, and we would use that acetate to compare against any mark that we saw on those items.

- 42. I think we'll have had the overlay there because we do have the overlays and they have been taken at the time the shoes were examined, and we'll have noted that there were shapes on the soles, the sole pattern, and we've said that there's marks that potentially possibly included a triangle, but there wasn't really anything else to go with for comparison purposes.

- 43. When you are looking at a footwear mark, if a full footwear sole has been in contact with a surface it could be unusual to get to only get only one pattern

Signature of witness..... 

element present. We've got a possible triangle but there was nothing else of the pattern of the shoe soles round about it.

- 44. So it's just a kind of random bit that may or may not have been a triangle, depending on how the fabric has been at the time. It might have been a scuff that's looked like a triangle, but we haven't written anything about the size.
- 45. It's a partial mark in that the edges may have not been distinct. We've obviously written in the notes that the resolution of the mark isn't good, so there was maybe no distinct, clear edges for us to say, "It's definitely a triangle." It might have been part of a square, without seeing what the image looked like, but it's not the whole pattern of the shoe. So we're looking at it because we're looking for a footwear mark. We've maybe got a partial footwear mark in some of these, but I don't even think we had enough to say that it was a footwear mark. We had marks on the jacket, but it was insufficient for any further examination of it. To clarify, I have stated this from reading the file notes prior to the image of the marks on the vest being shown to myself by the Inquiry.
- 46. All the little bit of mark could've been made at one time. There could have been folds in the fabric or it could have been crumpled. I didn't have a full footwear mark so anything that wasn't a full footwear mark would be considered a partial mark because that is what we're looking for.
- 47. We've said it included a possible triangle, so the whole thing wouldn't have been a triangle. There might have just been a little bit that possibly was a triangle, but, depending on where the folds could've been, it might not have been a triangle. That's why that's just in our notes and not in the report because we wouldn't say that it's definitely there. It's only it's a possibility that there was a slight triangle or shape.

Signature of witness..........

Photograph of vest

- 48. I have been shown a photograph of a police vest (PIRC-01176). I recognise this, it looks like a police vest. It looks like there's a curved bit towards the armhole area, and slightly towards the most right-hand side of that, so towards top of the vest, that would be the bit that we were saying is a possible triangle. So you can see that it looks like there's two sides that come to, not quite a point, but almost pointy. But where the base of the triangle would be, that's not a complete line.

- 49. There are three dark patches in a row, and then there are two lines. The left one's a line, the middle one's a top to bottom line, and the third one looks like a capital A.

- 50. So that shape would be the bit that we've said would be the possible triangle. That's the sort of triangle that I've written about. There's also a tiny little bit of a mark on the reflective strip. You've kind of got the triangle "A" shape. Then, just to the left, there's the line. Then there's a line that's almost down to the right. It's, kind of, in a curve of the armhole. Not quite parallel, but it almost follows that shape.

- 51. That's why we would've put it under different light sources to see if we could see anything else coming up, because it's on the different fabric type. So we'd have looked at different things, but we didn't get any extra marks coming up. I mean, that could be oil or from anything. Somebody could've lent against an oily hinge or an oily pool, or it's just dirty dark marks.

Composition of the mark

- 52. I've been asked if I was able to identify the composition of whatever chemical had caused this mark. No. Just looking at it, it was black marks and we didn't have anything to compare against. I'm not sure we were asked that as such,

Signature of witness..... 

we were really doing the footwear comparison part of it. If we'd needed to extract something, we could've looked at it for accelerants to see if there was a hydrocarbon mixture there, but it wouldn't have been packaged appropriately for that. It was in a brown paper bag.

- 53. So, for any accelerants analysis, it would needed to have been in a knotted nylon bag but I don't think that would necessarily have even helped anyway, because, if it had been oil, you might have just got a hydrocarbon mixture and we would've needed something to compare against. We didn't have a comparison item of dark staining to make that. But no, I think we were just asked to look to see if the boots could've made that mark. We were looking at the footwear comparison part of it.
- 54. I've been shown a photograph of boots (PIRC-01176) and asked if they were the ones I looked at. I don't remember, but they could well be. It's a long time. I know they were Logic or something boots.
- 55. I've been asked if I could take samples from the sole of the boot and compare it against the mark on the vest. We don't do soil examination or comparison here within SPA, so that would have to be somebody else if they were looking at soil comparison. The mark on the vest didn't look like soil to us. It looks darker than the soil that we're seeing on the footwear there in the photograph.

Conclusions in report

- 56. Shirley has put in the notes that there was areas of dark staining noted on the back, and then when we've been looking at the vest, when we've had it back out to look under the VSC, Shirley's maybe been doing the manipulation of the garment so I have added to the notes. We've both signed these notes. If Shirley didn't agree that there was possible shapes there, then she wouldn't have signed the notes.

Signature of witness..... 

57. Basically, in the notes, we've said that there's a possible triangle. Possible it could be an element from the shoes, but there's really insufficient detail or resolution of the mark for a meaningful comparison. So, because we deemed that there was not enough for a meaningful comparison, we thought it would be misleading to say that there is a triangle there because it may or may not be a triangle and it's not a complete triangle. So that's why we wouldn't have added that in. But that's not unusual. In other footwear cases, we might see fragmentary marks or little bits here and there, but if it's not enough to do a comparison with, we would say that there was insufficient for a meaningful comparison.
58. After we've done our report, it goes through to a technical check before it comes out. So, whoever has pp'd the front of the report, the covering letter, they'll have checked the notes that Shirley and I have written, and both signed against the content of the report.

Referral of articles to other sections

59. I've been asked whether it would be for me to refer articles onto another laboratory or unit. Sometimes I suppose it could be, and I think that's why we've sent the vest down to MEL because they've got different lighting techniques from what we have available to us in the Chemistry section. They have techniques with lasers and laser light and light of different wavelengths and goggles. So that's why we would have sent that down to them to see, because if they had managed to visualise more of a mark, it can then be photographed, and we can then use the photograph for a comparison. But they haven't found anything else when we've spoken to them.
60. We've not written who we've actually spoken to in MEL. It's personally myself that has written the note saying: "*To be forwarded to MEL for treatment, then re-examination if anything else observed.*" But it might've been that we've phoned down. There was probably somebody from MEL at the original

Signature of witness..........

strategy meeting or one of the strategy meetings. There's also been other items that have come in that have been sent down to MEL.

61. So things have already been sent to MEL, so there would be somebody allocated that case, and we would probably have just contacted by phone the person that was dealing with the other items in that case and asked them to look at the vest with their other light sources to see if anything else comes up. That wouldn't be unusual. It's just that they have the equipment and the skills to use those techniques.
62. We certainly sent them the vest. We possibly didn't send them the shoes. I haven't written down that we've sent them the shoes, but they just need to be able to see if any other marks come up with their techniques, so they wouldn't do the comparison as such.
63. So, when they've looked at their different wavelengths that we don't have access to, if they'd seen anything extra, they would've let us know, and they would've had it recorded. It would've been photographed to scale, and we would've used that scaled photograph to do a comparison with the footwear mark. We would've put the result of any comparison work in our report. But we wouldn't have put their light examination in because actually that's their work.
64. So the report that you've got there that says that there's lighter marks and darker marks, but there was insufficient for a meaningful comparison, that would be the end of our comparison work. As we don't know exactly what techniques MEL have used, that wouldn't be for us to report on their work. They would report their own bit.
65. Once the Chemistry examination is complete the articles will be returned back to our Production Store or they would be forwarded on to another section if someone else needed to look at it; like the vest we've obviously forwarded

Signature of witness..... 

down to MEL. It would sit in Productions to go out otherwise. If we knew that we had something else to do then an item may come back to us. For example, the knives were looked at by Shirley and I to see if there was a possible set of knives and then forwarded on to other sections before going back to PIRC. I think there was a re-submission form for the knife as the toolmark examination request came in later so some items have definitely been sent out and come back in again.

66. I've been asked if my last involvement with the vest was when it went to MEL. Yes, I believe so. But sometimes MEL won't put the productions out themselves. They think that we might need it, so they just send it back to us, and then we would've put it out.

Examination process and findings in respect of the knife

67. We were given the three knives from the kitchen and the knife that was recovered from Hayfield Road. We take general observations on them, their sizes, their lengths, the materials they're made of, any markings on them. There was "House & Home" written on Knife 1, Knife 2 and Knife 3. It was very, very faint on Knife 3, and also was written on the one from the grass verge.
68. I think they were in different sizes, so they looked like they could've come from the same set. They were just similar in general appearance, what they were made of, the shape of the handles. They each had a different blade shape, depending on what the knife's purpose was, like you would get in a normal knife set. So, for us, they could've come from the same set or it could've come from another set of similar knives. There's not just one set in the world that's labelled "House & Home".
69. Biology looked at certainly the knife that was recovered from the grass verge. So there might have been fingerprint work done on them. For us, it was just a

Signature of witness..... 

visual comparison and examination, so that involved us taking measurements and visual appearance.

70. Shirley and I have said in the report (COPFS-00114) on page 9 of the pdf: *"The knife in "SD918 – KNIFE" was examined and compared with the knives in "KNIFE 1", "KNIFE 2" and "KNIFE 3" when they were found to be similar in general appearance and similar markings to each other. In our opinion, the knife in "SD918 – KNIFE" could have come from the same set as the knives in "KNIFE 1", "KNIFE 2" and "KNIFE 3", or any other set of knives with similar appearance and markings."* So, if the knife set had contained six knives, that could've been four from one set, or it could've been three from one set and one from somewhere else.

PIRC requests

71. I have been asked if I have been contacted by PIRC or the Crown Office for a statement in this case. Certainly not recently. We were asked to do work for them I think in 2015 because I think that's who our reports went to.
72. And then we had an email either during the pandemic or just before telling us anything in emails or any digital files that we had, that we weren't to delete anything and it was all to be kept. But we haven't been asked, I don't think, for a statement from them other than the reports that we produced. We usually do a NSS, which is a National Standard Statement, but that's basically just the one that's attached onto the emails that you send with the reports.
73. The NSS statement is just basically saying, "We were asked to do these things and we've done a report, it's got this lab number on it and it was signed with whoever."

Signature of witness.....

Media coverage

- 74. I've seen little bits about it in the media, and I've seen stuff on social media. On Facebook there's been people sharing the incident or whatever, but generally I don't involve myself with those posts. When I see it, I know that's a case that I've worked on, but then that's not unusual, because a lot of the cases are stories that we see on the news or maybe things that we've had in the lab or have awareness of. I know what we've done in the lab, and I know that we've not treated it any differently from any other case that we would do.

- 75. It doesn't matter to me who an accused is. It wouldn't have been treated any differently at this end in the lab to how any other case coming in would've been. If we could've done something, we would've done something, and if we can't do something, we can't do it. I didn't know Sheku Bayoh. I don't know any of his family.

- 76. I've seen people sharing bits of the story on Facebook, but that's not something I tend to get involved with. There'd be a news report on the BBC page, maybe, and people will have written comments from that or people asking for inquiries or saying what a lovely person he is or whatever, but that doesn't matter to us because we're not looking at that bit. It doesn't matter to us that it was a police vest.

- 77. If there had been a death after a fight between him and his friend and we're looking at the friend's clothing to see if there was footwear marks on that, that wouldn't be treated any differently from Shirley and myself to looking at, allegedly, an incident between him and a police officer. We're looking for the contact. The work we do, the comparison doesn't really matter who the people involved are.

- 78. I've been asked whether I know anything from the news or media or social media that makes me aware of why the mark on the vest might be significant in this case. I know there's been talk about how the arrest procedure was

Signature of witness..... 

taking place. But like I mentioned earlier, I don't know what their normal restraining techniques and things would be. I know they're saying he'd been acting aggressively at some point, and that it took a lot of police officers to restrain him.

- 79. I think there's allegations over people were more forceful than they should've been, but I wouldn't know any of that. I wasn't involved with that aspect of it. We're just looking at the items after. I think some of the people hadn't had a lot of years' service that were involved, potentially. I think I've maybe seen that, but I don't know any of the police officers involved, and I don't think I've ever met any of them.

- 80. Presumably there'll be an inference that he has kicked at somebody in a vest, but I don't know if that's meant to have happened. I assume that's alleged to have happened during the struggle, unless he's been alleged to have kicked at somebody first.

- 81. To clarify I can see in the background information that we had, there was something about punching. *"BAYOU allegedly punched and kicked one of the officers (Nicole Short) on the head and body. A struggle then ensued between police officers and Sheku Bayou."* We're looking to see if there was anything from her clothing and his shoes to show that his shoes had made contact with her vest.

- 82. I believe the facts stated in this witness statement are true. I understand that this statement may form part of the evidence before the Inquiry and be published on the Inquiry's website.

Signature of witness.....



..... Date.....

May 18, 2022 | 1:25 PM BST

