



Police Investigations & Review Commissioner

DOCUMENTARY PRODUCTION

(BACKING SHEET)

Police Ref:

Prefix: [][][]

Operation

No. P I R C 0 1 0 5 1 5

Operation Quoich
Production Book Ref. No. 762
PF Ref No LAB/IMCK
Forensic Lab Ref No.
Officer I/C Case John McSporrnan SI
Officer Seizing Wm Little DSI

CASE OF Death of Sheku Bayoh

Owner PIRC
Address: Hamilton House Hamilton
Tel No.
Signature
Case Against/Incident Death of Sheku Bayoh

COURT PRODUCTION NO.

DIVISION / DEPT / STATION

Desc. Of Article:
Copy of Expert witness Letter of Instruction to
Dr Maurice Lipsedge dated 19 November 2015

Signature(s) or person(s) identifying article
1 [Redacted]
2 [Redacted]
3
4
5

Print name
William Little
.....

Dr Maurice Lipsedge

Email: [REDACTED]

19 November 2015

Dear Sir,

**Death of Sheku Ahmed Tejan Bayoh
Expert Witness Instruction**

In furtherance of the above subject and our recent telephone discussion.

In terms of the Police and Fire Reform (Scotland) Act 2012, my responsibilities include undertaking independent investigation when directed to do so by the Lord Advocate,

- (a) into circumstances in when there is an indication that a police officer may have committed an offence and
- (b) into circumstances of any death, which involves a police officer which may result in a Fatal Accident Inquiry

I am currently investigating the death of Sheku Ahmed Tejan Bayoh, born 30/09/1983 of [REDACTED], who died on 3 May 2015 at the Victoria Hospital, Kirkcaldy, following his contact with officers of Police Scotland. This investigation is being directed by the Lord Advocate of Scotland. The Lord Advocate is the chief law officer in Scotland, a minister of the Scottish Government, and head of Crown Office and the Procurator Fiscal Service (COPFS), the independent public prosecution service for Scotland.

Following post mortem and toxicological analysis, the cause of death of Sheku Bayoh is provided as 'sudden death in a man intoxicated by MDMA and Alpha PVP, whilst being restrained'.

Evidence is available to show that the deceased previously used anabolic steroids and in the hours preceding his death had consumed alcohol and drugs. Evidence is also available to show that officers of Police Scotland

sprayed CS and PAVA at the deceased, hit him with batons and physically restrained him.

Please accept this letter as formal instruction for you to produce an expert witness report based on the information provided within the attached package. In this regard, expert witness opinion is sought from you on;

- (a) Potential impact of the drugs identified in the attached package, on the behaviour of the deceased as described by the police and civilian witnesses.
- (b) any behavioural science aspects of the case including in particular reference to whether the actions of the officers are indicative to particular mind set indicating that the officers were behaving as a group rather than as individuals.

Please let me know if you require any additional information to assist you in this regard.

As you will appreciate, the material provided in this connection is shared with you on a confidential basis and it and your findings should not be disseminated further without prior consultation.

I am aware you have already received your company acceptance form duly completed and signed on behalf of PIRC.

I trust this will allow you to undertake the work as requested. However, should you have any queries please contact Deputy Senior Investigator William Little on telephone number [REDACTED] or email [REDACTED] :

Yours sincerely,

Kate Frame
Police Investigations & Review Commissioner