

**Private and Confidential
For Addressee Only**
FAO Caroline Featherstone
Solicitor to the Inquiry
Southport Inquiry

Date: 10 July 2025
Our Ref: JONESS\L&DM-0000069
Direct: DPA
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By e-mail only: solicitor@southport.public-inquiry.uk

Dear Ms Featherstone

Our client: Amazon
RE: Rule 9 3 July 2025

We write further to the Inquiry's Rule 9 Request to Amazon dated 3 July 2025 ("the Request") and set out below our client's response to the seven requests therein, all of which are reproduced below for ease of reference.

Requests 1-3

1. *All documentation for any Amazon user accounts held by Axel Rudakubana ('AR').*
2. *This should include AR's accounts associated with:*
 - a. *Telephone number: 07428362306;*
 - b. *Email addresses:*
 - i. A.megalia7@yahoo.com;
 - ii. A.hyenadon@gmail.com
 - c. *10 Old School Close, Banks;*
 - d. *8 Old School Close, Banks.*
3. *It should include all:*
 - a. *Account details;*
 - b. *Purchase history;*
 - c. *Emails sent and received;*
 - d. *Any packaging labels that would have been placed on parcels delivered to AR that were*
 - i. *Subject to age verified delivery;*
 - ii. *Items that could be used as weapons including; knives, and bows and arrows and Molotov cocktails; and/or*
 - iii. *Materials that may be used to make poisons/toxins, including ricin.*

Information has been provided in respect of all Amazon accounts associated with AR. This includes details of AR's account (highlighted in green) AR's father, Alphonse Rudakubana (highlighted in blue) and AR's brother, Dion Rudakubana (highlighted in orange).

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Please note:

- In relation to request 2(b)(ii) Amazon has been unable to identify an account which is associated with the e-mail address a.hyenadon@gmail.com. If the Inquiry is able to provide any further information relating to this account, Amazon will of course revisit this. It may be helpful to explain at this juncture that if this was an account held by AR which he then deleted, Amazon is unable to retrieve data relating to such an account or confirm its prior existence.
- In relation to request 2(d), in the tab called 'Account Data', there are various names and addresses registered against AR's account. This includes various addresses where AR could have sent items or gifts and this includes 8 Old School Close, Banks. Amazon has not carried out a search for independent accounts not linked to AR but linked to 8 Old School Close, Banks. If the Inquiry is in fact requesting the details of the Amazon account(s) associated with a neighbour, Amazon would request a Section 21 notice to provide this information to the Inquiry given that this would be personal customer data which would not appear to be directly related to AR. To be clear, Amazon are fully committed to assisting the Inquiry, but it is of course also mindful of its data privacy obligations to all customers. We appreciate that the Inquiry may be in receipt of information of which we are not yet aware, so if the Inquiry holds information which suggests that AR does have an account not referred to above which is linked to another address, whether that is 8 Old School Close or otherwise (as opposed to this address being specified as a delivery address in the account referred to above), Amazon are of course willing to undertake further searches on an urgent basis.
- In relation to request 3(c), Amazon has checked for e-mail correspondence under both e-mail addresses provided. Please note that e-mails with customers are retained for 13 months only. Attached to this response are a record of the emails Amazon has been able to locate which are to the first e-mail address provided (a.megalaria7@yahoo.com). You will note that there are references to 'confidential content omitted' in these records - this reflects what our records say and indicates personal information which we would not be able to see (e.g. where there is a change of password). There is also a reference to AR having enabled 'two-step verification' just before the purchase of the knives; two-step verification is a process by which a customer can add another security step to accessing their account; i.e. to log into the account, the customer must enter a password as well as a code they receive via SMS or an authenticator app. Amazon has no e-mail records for the second e-mail address (a.hyenadon@gmail.com), which aligns with the position as set out above – that no records have been found to suggest AR had an account associated with this email address.
- In relation to request 3(d), an example of the packaging labels that are placed on bladed articles is also attached. Red circles have been added to the labels to highlight the bladed article and age restriction warnings to the Inquiry. Having reviewed the items purchased, Amazon confirms that the only items purchased that were subject to age restriction were the knives purchased on 13 July 2024, and, as this purchase was of bladed articles, this would have automatically triggered the attachment of the bladed article label to the package.

Request 4

4. *The names of all retailers that were involved in the sale of any products purchased by AR that were:*
 - a. *Subject to age verified delivery;*
 - b. *Items that could be used as weapons including: knives, and bows and arrows and Molotov cocktails; and/or*
 - c. *Materials that may be used to make poisons/toxins, including ricin.*

For completeness, our client has provided in column H details of the sellers of each of the products purchased. Whether an item is subject to age verified delivery or not is detailed within column I of the attached spreadsheet. As set out above, the only items subject to age verified delivery were the knives purchased on 13 July 2024.

Request 5

5. *The names of all companies and personnel involved in the delivery of all age verified delivery products purchased by AR.*

As stated above, the only age restricted items AR purchased and received was the one order of the two knives. Amazon does not hold any personal data for the personnel delivering orders, as they are engaged as independent contractors by third parties. The name and contact details for the relevant third party for this order were retrieved and provided to the police on 27 December 2024. Amazon is of course willing to provide these details to the Inquiry, however, it requests a Section 21 notice for these details to ensure that it does not fall foul of any data protection requirements.

Request 6

6. *The results of Amazon's UK age verified delivery mystery shopper audits, including the pass rates from 2019-2024. If it is technically possible to do so, please provide data both nationwide and for the North-West.*

We have attached a spreadsheet setting out the results from the mystery shopper audits in 2020, 2021, 2022, 2023 and 2024. Our clients have been unable to find in their records historic data from 2019 and in 2023 there was a change in the supplier that conducts the mystery shopping audits so some of the datasets differ (e.g. mystery shoppers now record whether it was a purchase of a bladed article). For 2024, our client has been able to separate the results by region and has included in a separate table the comparison between the North-West region and the overall position for the UK.

In order to assist with understanding the mystery shopper audits we have summarised below the current process.

- The mystery shopper audits are conducted by a third party supplier who provides auditors (i.e. recipients) who are aged between 18 and 24 years old.
- The purpose of the mystery shopper audits is to test the delivery process through Challenge 25+ policy, which requires drivers to ask customers receiving age-restricted items when they were born and, if they are or appear to be under the age of 25, to ask them to show government issued ID. It is not showing rate of underage purchases as the 'customers' will never be minors.
- The mystery shopper audits are conducted for all age verified deliveries and not only bladed items.
- It is for the auditor to decide what age verified delivery item they purchase. The auditors could therefore purchase alcohol or bladed items. There is currently no guidance regarding the purchase of X number of items from Y category per month.

When an age verified item is purchased as part of this process, there are three potential outcomes for the driver:

1. Pass – this is where the driver followed the process in full. The driver requested the year of birth from the auditor and also the physical ID when they informed the driver that they were under 25.
2. Partial pass – this is where the driver partially followed the process. In the majority of cases that result in a partial pass, the driver requests the year of birth (being between

18-24) and inputs that into their device, then requests the date of birth but does not then carry out the second step and request to see the physical ID.

3. Fail – this is where a driver does not complete either the verbal or physical check. If an item is left at the delivery address without passing it to a verified adult that would also result in a fail.

In the data, the 'compliance rate' reflects the percentage of full 'Pass' rate outcomes (paragraph 1 above) across all audits.

Request 7

7. *Policies concerning the sale and delivery of:*
 - a. *Items that could be used as weapons including, bows and arrows and Molotov cocktails (to the extent not already provided); and*
 - b. *Materials that may be used to make poisons/toxins.*

In our previous rule 9 submission, we included documents setting out our policies on weapons and other prohibited products – we have reattached them here for reference. All listings and products must comply with applicable laws and regulations. Items that are classified as weapons under UK legislation are prohibited. Amazon has numerous algorithms, tools and controls in place that it uses to proactively identify, monitor and flag potentially prohibited products including key-word filters, automated imaging technology as well as human reviews. Amazon's guidance on prohibited and restricted products is regularly reviewed and updated, and Amazon works closely with the Home Office and regulators to continuously improve its controls and monitoring processes.

We trust that the above assists the Inquiry, however, should it require any further information in relation to the above, please do let us know.

Yours sincerely

SIGNATURE

Sarah Jones
Partner
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