

From: Wood, Peter <Peter.Wood@canopius.com>
Sent: 09 February 2015 11:30
To: Josephine Ward
Cc: lorraine32@blueyonder.co.uk; Austin, Andrew
Subject: RE: Appeal against conviction for no insurance Regina v. Simon Paul Cordell on 5th March 2015 at Kingston Upon Thames Crown Court
Attachments: Witness Statement 060215 S Cordell.docx

Dear Ms Ward,

I have drafted a section 9 statement as requested. Before I sign it off can you review it and confirm it satisfies all of your requirements please? As soon as you do so I will sign it off, scan a copy over to you and put the original in the post.

Let me know if you need anything else and of course if you need me to amend the attached in any way.

Lorraine/Andy – FYI.

Regards

Peter Wood

UK Specialty Operations Manager |
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From: Josephine Ward [mailto:josie@michaelcarrollandco.com]
Sent: 08 February 2015 19:02
To: Wood, Peter; Austin, Andrew
Cc: lorraine32@blueyonder.co.uk
Subject: Appeal against conviction for no insurance Regina v. Simon Paul Cordell on 5th March 2015 at Kingston Upon Thames Crown Court

Dear Mr Wood

I have been instructed by Mr Simon Paul Cordell and Miss Lorraine Cordell to assist in the appeal against conviction that is due to be heard at Kingston Upon Thames Crown Court on 5th March 2015 at 10am.

Miss Cordell has played two recordings that she received from KGM which are pertinent to the appeal but at present as the telephone recordings have not been produced as an exhibit by KGM they will not be admissible at court.

Can you therefore please write a section 9 statement confirming that:

- (a) all recording equipment was working correctly
- (b) KGM produced two recordings at the request of Ms Lorraine Cordell
- (c) Confirmation that the recording of S Cordell call from police 141113 Recording was provided by KGM from their recorded calls and is authentic
- (d) Confirmation that the recording between the Car Pound and Kelly Tiller was also provided from the KGM recorded calls and is authentic

If we are in possession of a section 9 statement producing the recordings then we will not have to apply to the court for a Third Party Summons to compel an employee from KGM to attend to produce the recordings. This would be a complete waste of your time when all we require is a section 9 attesting to the recordings being retrieved from the system and exhibited as two separate

recordings.

If you require assistance with drafting a section 9 statement then we would be happy to draft it and email it over. We would require the name of the person who retrieved the recordings, the dates that the recordings were retrieved, the dates the recordings relate to, confirmation that the recordings were sent to Lorraine Cordell by email so that she can produce CD's of the recordings so that they can be played in court and specifically refer to the email containing the recordings so that there is continuity in the chain of evidence. Ideally we would like KGM to produce the CD's and exhibit them but failing this we will try to get the CPS to agree the CD's as produced from the email of Miss Cordell. We stress that the section in relation to the search and retrieval of the KGM database is essential and critical to ensuring that the chain of evidence is intact.

We can serve these recordings on the CPS and the Court so that they are agreed in advance of the Appeal hearing.

We thank you in advance for your anticipated co-operation in this matter and hope that we do not have to apply for a Third party Witness Summons to compel the attendance of a KGM employee at the Appeal on the 5th March 2015.

We confirm that Miss Cordell is forwarding an email confirming that we are instructed and authorised to request this information.

Yours faithfully

MICHAEL CARROLL & CO.

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Witness Statement

Statement of: **Peter Wood**

Occupation: **Operations Manager, Motor Underwriting Department**

This page consists of two pages and signed by me. It is true to the best of my knowledge and belief and I make it knowing that, if it is tendered evidence, I shall be liable to prosecution if I have wilfully stated anything in it that I know to be false, or do not believe to be true.

Signature:

Date:

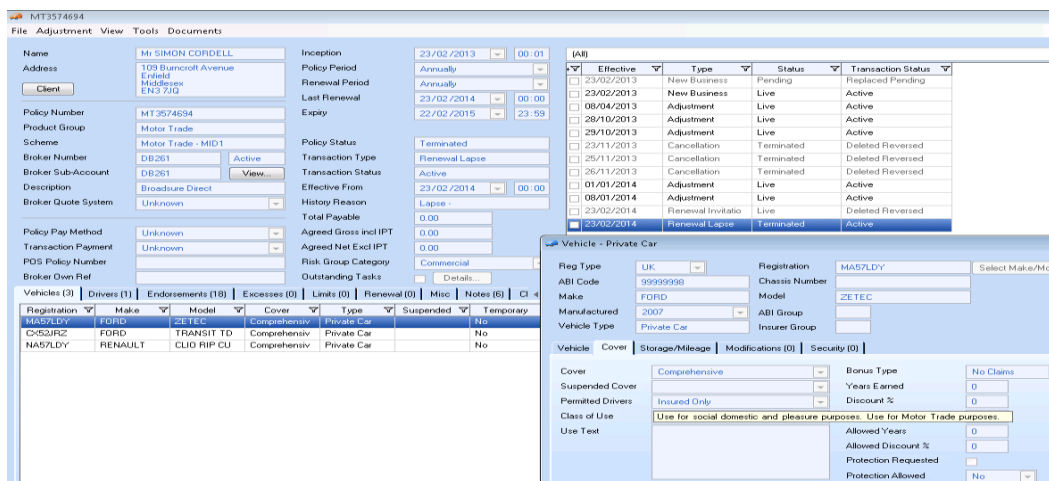
I work for KGM Motor Insurance, an Insurance Company based in London. I am an Operations Manager working for UK Specialty, Canopus. KGM is a member of the Canopus Group in the UK Specialty Division. I am responsible for managing the timely and accurate processing of all client records supplied to us via our Broker network.

Josephine Ward of Michael Carroll & Co (with Simon & Lorraine Cordell's permission) contacted me on the 8/2/2015 requesting a statement in respect of relevant recorded calls supplied plus a Letter of Indemnity pertaining to Mr Simone Cordell's policy number MT3574694. I understand the statement request is connected to an appeal against conviction for no insurance, Regina v. Simon Paul Cordell to be heard on the 5th March 2015 at Kingston Upon Thames Crown Court.

I would confirm that –

- The policy was inception on the 23/2/2013 allowing Mr Simon Cordell only to drive at Comprehensive cover.
- The vehicles covered at inception were –
 - Ford Zetec registration MA57LDY.
 - Ford Transit registration CX52JRZ.
 - Use allowed was Social Domestic & Pleasure & or Motor Trade purposes only.

Please see the policy screen shot below confirming this –



The screenshot shows a software interface for policy management. The main window displays details for policy MT3574694, including the client name (Mr Simon Cordell), address (109 Buncroft Avenue, Enfield, Middlesex, EN3 7JG), and policy status (Terminated). A table on the right lists transaction history with columns for Effective Date, Type, Status, and Transaction Status. Below this, there are sections for 'Vehicle - Private Car' details, including registration (MA57LDY), make (Ford), model (Zetec), and cover type (Comprehensive). A 'Vehicles' table at the bottom lists three vehicles with their respective details.

I have become involved in this matter following receipt of a Data Subject Access request and a complaint letter from Simon and Lorraine Cordell. During the course of my investigations to establish all the facts before responding to the letter of complaint it has been necessary for me to obtain and listen to various phone calls between the client and Underwriters, the Broker and Underwriters, Underwriters and the Police compound and the original call from the officer at the roadside and Underwriters.

I feel I have now reached a good understanding of the sequence of events and as a result have provided both a Letter of Indemnity and 2 relevant call recordings to Lorraine and Simon Cordell to support their appeal.

Josephine Ward has requested that in addition to this I provide a section 9 statement and confirm the following points –

- I have been able to search and locate, I believe, all of the relevant call recordings connected to this matter. I have located in total 8 call recordings but have provided the 2 relevant calls being the call from the officer at the roadside talking to Underwriters and the call from Underwriters to the Police compound. The fact that I have been able to search for and locate these calls proves to me that our call recording equipment was functioning correctly, certainly on the days in question, on the few occasions its not working the result is that you cannot locate any call recordings.
- I would confirm that the 2 calls I have provided to Simon and Lorraine are authentic and have come from KGM call recording systems. These 2 calls specifically are –
 - The call made to Underwriters by the Police officer on the 14/11/2013
 - The call made by Kelly Tiller to the Police compound on the 26/11/2013
- I would confirm that I was searching for and located these call recordings on the 23/1/2015.
- I would confirm that I e-mailed these call recordings across along with the Letter of Indemnity to Simon & Lorraine Cordell on the 30/1/2015.

Signature:.....

Date:.....

If I can be of any further assistance please do not hesitate to contact me.

These notes/documents were created or received by a person in the course of trade, business, profession or other occupation, or as the holder of a paid or unpaid office and the information contained in the notes/documents was supplied by a person (whether or not the maker of the statement) who had, or may reasonably be supposed to have had, personal knowledge of the matters dealt with and where the information contained in the notes/documents was supplied directly or indirectly each person through whom it was supplied received it in the course of a trade, business, profession or other occupation, or as the holder of a paid or unpaid office and the person who made the statement cannot reasonably be expected (having regard to the time which has elapsed since he made the statement and to all the circumstances) to have any recollection of the matters dealt with in the statement.

Signature:

Signature witnessed by:.....