

- (v) The Appellant does not accept that he had any sound recording equipment at this incident. He attended this incident in his car. He had no sound system, speakers, generators etc. The Appellant specifically requests the CAD 9717 referred to in the statement of PC Ames as he believes that this will reveal the true identify of the organisers.

The Appellant will state that he has no connection with Every Decible matter. The Appellant will state that he met Moses Howe in 2011. Moses Howe was a sound engineer. The Appellant will state that he was offered a three month trial at Club Juice, 1 Jute Lane, Enfield, EN3 7PJ to see if he could increase numbers to the Club. Moses Howe was going to be the Appellant's sound engineer. The Appellant will state that Liam Philip was an MC who was going to inspect Club Jute. The Appellant provided entertainment at the Club previous to this. See attached promotional flier for an event, "Rewired" organised on 23<sup>rd</sup> July 2011 at Club Jute featuring DJ Substance and DJ Calous. This was licensed. The Appellant however had to stop due to police persistently stopping and searching him.

5. The Appellant will state in response to paragraph 17 that he had nothing to do with the organisation of the event at Progress Way that gave rise to the complaints of anti-social behaviour and noise nuisance.
6. The Appellant will state that this ASBO is disproportionate and it prevents him from engaging in lawful business. The ASBO will prevent the Appellant from applying for licences to hold events. The Appellant will state that whilst he is subject to an ASBO he will be prohibited from applying for any entertainment licence and any licence application will automatically fail and therefore this is disproportionate.
7. The Appellant has designed a business plan, a festival plan and community event that sets out clearly the plans for events including marketing, safety, stalls etc and also specifically refers to co-operating with the police. The ASBO prevents any applications from being successful.
8. The Appellant will state that he has never been involved in the organisation of an illegal rave as defined under section 63 of the CJPOA 1994.
9. The Appellant will state that he has never had any equipment seized during an illegal rave as defined by section 63 of the CJPOA 1994. The Appellant will state that there has only been one occasion when his sound system was seized and he had hired this out to he believed to be a genuine customer. The Appellant will state that
10. The Appellant will also state that the current terms of the ASBO are too broad.