

**From:** Josephine Ward <josie@michaelcarrollandco.com>  
**Sent time:** 02/03/2016 10:11:01 AM  
**To:** re\_wired@ymail.com; Andrew.Morris@legalaid.gsi.gov.uk  
**Subject:** Simon Cordell v. The Commissioner of Police of the Metropolis for mention on 4th April 2016 at Wood Green Crown Court

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Simon

Can you please review the initial response to the Respondent's application to adduce the hearsay evidence. I have included some of the points that you take issue with. A full skeleton legal argument will be served addressing all points you wish raised following our meeting on Friday morning at 11am subject to you confirming that you can attend. I need a response to the email which I am proposing on sending over to the court so that our objection to the hearsay evidence is noted.

Please confirm in writing your specific instructions with regards to the email below and confirm your authorisation for me to send it, in addition to any amendments that you wish me to consider including. I need a response to this before 3pm today, 2nd March 2016 please.

Regards

Josephine

Dear Sir or Madam

We refer to the hearsay application dated 23rd February 2016, received in the DX at our office 1st March 2016.

We require all witnesses to attend as listed on page 5 - 66 to be cross examined.

We confirm that we object to the Respondent's application to adduce hearsay evidence contained in the CRIMINT reports pages 79 - 92, 109 - 121 of the Respondent bundles.

CRIMINT - YERT00376728 - Aaron King is required to attend to be cross examined

CRIMINT - YERT00376227 - PC Chandler is required to attend to be cross examined

CRIMINT - YERT00376229 - PC Edgoose is required to attend to be cross examined. The Appellant also specifically requests disclosure of police checks made on the vehicle he was driving and the vehicle he was alleged to have been driving bumper to bumper to. The Appellant also requests specific confirmation in a statement from PC Edgoose the following: (a) why he was not arrested for any offences in relation to his driving as PC Edgoose makes specific reference to the driver he was following confirming that the Appellant had been driving in the same manner from YR. (b) Summons for any road traffic violations (c) CADS / communications concerning name checks

CRIMINT - YERT00376024 - PS Skinner is required to attend to be cross examined. The Appellant seeks specific disclosure as to the vehicle checks carried out on PE52 UHW. Whether Simon Cordell was ever stopped in this vehicle in the past? Whether Simon Cordell was ever stopped in company with Elliot Laidler in the past? Why was the music system not seized? Full names of all other persons inside the premises to confirm the number of people present. Results of the search of the premises, in addition to the keys found at the premises? Whether any other persons were arrested, if so what for? Disclosure of CADS / statements / complaints regarding anti social behaviour? Whether any allegations of criminal damage / commercial burglary was made? What enquiries were made from the owners of the building as to the premises being occupied?

CRIS 1914855/14 - Statements from officers who attended the premises, confirming from whom the sound system was seized?

Whether Simon Cordell was present at the event? Why was the sound system restored?

CRIMINT - YERT00374531 - PC Shinnick is required to attend to be cross examined.

CAD's re 6th, 7th and 8th June 2014 Progress Way.

The Appellant seeks full disclosure of all CADs linked to this CAD. The Intelligence report suggests that Simon Cordell and Tyrone Benjamin set up and organised this rave. The Appellant requests a full detailed statement report as to the basis of this comment. The Appellant disputes ever being inside Progress Way premises on 7th June 2014. The Appellant disputes supplying equipment at this location. The Appellant disputes that he set up or organised this event. The Appellant seeks disclosure of all intelligence, names etc of persons present at this event. The Appellant specifically requests disclosure of all CADs from 6th June 2014 onwards in correct chronological, timed and dated order. The Appellant also seeks confirmation as to whether the complaints made with regards to anti- social behaviour were made in respect of Progress Way or Crown Road, the premises of which was subject to numerous complaints in the past by local residents etc. The Appellant also seeks specifically disclosure from the Public Order Unit whether they were provided with the names of other persons present, vehicles etc and whether the named persons have been known in the past for organising similar events.

The Appellant takes issue with the CADs in respect of this event and the manner in which they have been presented. The Appellant is raising issues with the timings of the CAD's and he instructs us to specifically challenge the accuracy and to question whether the CAD system was defective or manipulated by the Respondent's employees.

The Appellant also notes from the CAD's served that there are CAD's explicitly linked from 1st June 2014 and 2nd June 2014. The Appellant seeks disclosure of all CAD's as he contests that they will reveal who the organiser of this event on 6th, 7th and 8th June 2014 was. The Appellant will state that he was not present on any occasion inside the premises of Progress Way and he will state that the Respondent is in possession of information which would reveal the real identity of the organisers of this event. The Appellant believes that the redacted CAD's are concealing the locations and complainants as the complainant's may be on duty police officers making complaints to bolster an application for an ASBO against the Appellant. The Appellant also believes that the CAD's may specifically be in relation to Crown Road, Southbury Road a distance of approximately one mile from Progress Way.

The Appellant will state that the officers who made the entries, reports etc should be called to give evidence as by not doing so it is disproportionate towards him as he is trying to establish a legitimate entertainment company. The Appellant alleges that the Respondent is deliberately exaggerating his involvement in the events cited in the ASBO application. An ASBO against his name will significantly tarnish his ability to conduct legitimate business. The Appellant also takes issue with the misleading press releases in relation to the original imposition of the ASBO in the Magistrates Court. The Appellant will state that the District Judge in delivering her judgement could not find any form of illegality, or that the events alleged were in fact "raves" as defined by the legislation. The Metropolitan police published this in local media to tarnish his reputation.