

FAO Miss Sally Gilchrist
Directorate of Legal Services
Metropolitan Police
10 Lamb's Conduit Street
London WC1N 3NR

Date: 8th September 2016

By fax: 0207 404 7089
By email: sally.gilchrist@met.police.uk

Dear Ms Gilchrist

**RE: SIMON CORDELL V. THE COMMISSIONER OF POLICE OF THE METROPOLIS
APPEAL AGAINST THE IMPOSITION OF AN ASBO – 26TH SEPTEMBER 2016 AT 10AM**

I refer to the above matter.

As you are aware Mr Cordell's appeal is listed for 26th September 2016. On 4th April 2016 HHJ Pawlak made a direction that the Respondent prepare and serve on the Appellant and the court a schedule setting out the dates, times and locations of each incident and also to specify the alleged involvement of the Appellant in the organisation of the illegal raves by 1st September 2016.

You should also be in possession of a lengthy document prepared by the Appellant and his request for disclosure of all unredacted CAD's that the Respondent is relying on. The Appellant is of the view that a lot of the CAD's used in support of the Progress Way matters are in reference to completely different geographical locations, some distance away from Progress Way. The redacting of the CAD messages makes this extremely difficult to check. The Appellant has prepared in his bundle a number of maps for each CAD. Can you please request that DC Elsmore double checks the accuracy of the location of the CAD's relied upon and please provide unredacted CADs or remove CADs that are not geographically relevant. A request was also made for statements to be obtained from DS Val Tanner and DC Chapman in relation to any intelligence that the Public Order Unit holds that confirms Simon Cordell is an organiser of illegal raves. This information is crucial to Mr Cordell's appeal as he disputes ever organising an illegal rave, under the legal definition.

Mr Cordell also specifically requests that we obtain disclosure of a copy of all emails sent from DC Elsmore or any officer involved in the investigation of this ASBO application against Mr Cordell to the Public Order Unit in respect enquiries made by them in relation to Mr Cordell's involvement in the organisation of illegal raves and the responses. The Bundle makes specific reference to DS Val Tanner responding to an enquiry in DC Elsmore statement dated 26th June 2015. We request that DS Tanner provides a statement in relation to her conversations with Ms Lorraine Cordell and we also request that any recordings of these conversations be provided.

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Principal: Michael Carroll LLB HONS
Authorised and Regulated by the Solicitors Regulation Authority
SRA ID: 307837