

From: Lorraine Cordell <lorraine32@blueyonder.co.uk>
Sent: 11 February 2015 14:39
To: 'JOSEPHINE WARD'
Subject: RE: Appeal against conviction at Kingston Upon Thames Crown Court
Attachments: enquiries@ipcc.gsi.gov.pdf; S Cordell statement.pdf

Hi Josey

The dates of conviction was the 26/11/2014 Wimbledon magistrates court.

Appeal date is 05/03/2015 at 10:00 at Kingston Upon Thames Crown Court

I will try and put emails to something and bring them to the office do you need all the ones for all the driving with no insurance of just the ones for the appeal?

The complaints started on the phone to the police on the day this happened which was the 14/11/2013 I am sure I have the persons name here in my files I will try and find the name of the officer who was dealing with this matter on the phone calls as she called me back a number of times..

But I wrote to the IPCC on there form from there website on the 03/12/2013, I got the reply email for that form on 03/12/2013 at 13:30 please see attached email. But this will need to be updated now due to what has happened in this case with the police officer.

Please also see attached Peter Wood Statement.

I will bring all emails I can what I can do is export the emails to PDF like the one i have done in the attached from the IPCC then put them to disc as there is a real lot of emails and in outlook just saving them does not save them with all details. so as a rule i export to PDF. is this ok?

Regards

Lorraine

From: JOSEPHINE WARD [mailto:josephinewardsolicitor@gmail.com]
Sent: 11 February 2015 13:46
To: Lorraine Cordell
Subject: Re: Appeal against conviction at Kingston Upon Thames Crown Court

Lorraine

Can you transfer all from server onto a USB as this may be the easiest way of accessing the data. I suggested my office so that everything can be printed off and put in bundles and scanned and sent in the DX. Re the discs you can burn off and exhibit but I will deal with this in your section 9 statement.

I will have to request the data from the court re the trial notes so all I will need is the date of conviction and the appeal date and I will send that email off in the next ten minutes. I need these for two reasons (a) accurate transcript of what was said for the appeal hearing in Kingston Upon Thames (b) for when the formal complaint to the IPCC is made.

I am snowed under at the moment to please keep Monday appointment if you can and likewise I hope that I do not have to re-arrange.

Can you confirm with Simon whether he wants to apply to set aside the conviction which is the correct way to go about it. Time runs from date of conviction so 21 days so lodge appeal against conviction as I believe only a Crown Court Judge can sort out the licence being revoked.

You also mentioned that there was another court in East London or South East London can you bring whatever you need doing on that also.

Regards

Josephine

On Wed, Feb 11, 2015 at 1:24 PM, Lorraine Cordell <lorraine32@blueyonder.co.uk> wrote:
Hi Josey

1. APPEAL AGAINST CONVICTION - NO INSURANCE

I think the 17th will be fine just give me a time.

Not sure what you mean below about the CD should i burn a copy off and bring them with me to the office or do they need to be burned off at the office.

I can access emails that are being sent to me from the office if I make sure I close outlook on my computer, but would have no access to the emails that are already in outlook as these have been directly downloaded to outlook from the virgin media server and I have that setup to del once they have been downloaded.

Is it you who needs to ask for the Legal Adviser's notes re what was recorded as part of PC Geoghan's evidence and his officer's pocket book or me?

2. APPEAL AGAINST CONVICTION / SET ASIDE CONVICTION FOR 26.01.2015

On the 2nd part as I have already taken my emails to outlook they are not on a server so the only way to access them is from my computer.

Regards

Lorraine

From: JOSEPHINE WARD [mailto:josephinewardsolicitor@gmail.com]
Sent: 11 February 2015 11:54
To: Lorraine Cordell
Subject: Appeal against conviction at Kingston Upon Thames Crown Court

Lorraine

1. APPEAL AGAINST CONVICTION - NO INSURANCE

I need to draft a section 9 statement re transcribing the recordings onto CD. I need to draft a section 9 statement for you also so that you can exhibit them. I will also need to obtain a copy of the Legal Adviser's notes re what was recorded as part of PC Geoghan's evidence. I need to obtain copies of the officer's pocket book also.

Can you access your email from my office in terms of files as emails will have to be printed off? A bundle will have to be prepared for the CPS and the Crown Court.

What is your availability 16th or 17th February 2015. I am flying home the next two weekends. I am then on duty quite a lot and will have murder case papers served so I will be hectically busy.

2. APPEAL AGAINST CONVICTION / SET ASIDE CONVICTION FOR 26.01.2015

Again Lorraine it will take 1 -2 hours to go through this but I will need access to emails sent and received etc.

I await hearing from you.

Regards

Josephine

From: enquiries@ipcc.gsi.gov.uk
Sent: 03 December 2013 13:30
To: lorraine32@blueyonder.co.uk
Subject: Complaint form
Thank you.

Your completed form has been sent to the appropriate authority you have selected in the complaint form for them to consider.

They will be in contact with you directly in due course.

Regards,

Independent Police Complaints Commission

The original of this email was scanned for viruses by the Government Secure Intranet virus scanning service supplied by Vodafone in partnership with Symantec. (CCTM Certificate Number 2009/09/0052.) On leaving the GSi this email was certified virus free.

Communications via the GSi may be automatically logged, monitored and/or recorded for legal purposes.




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: 11/2/15

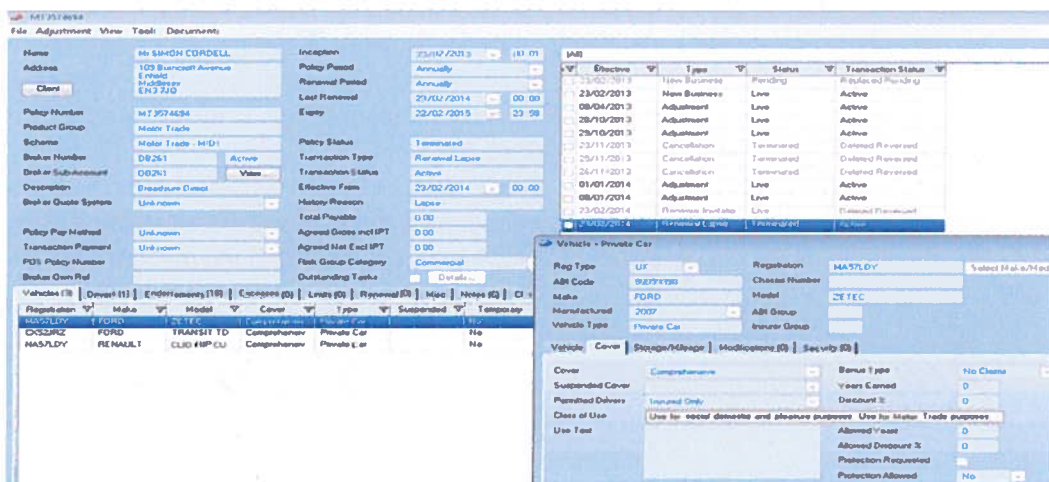
I work for KGM Motor Insurance, an Insurance Company based in London. I am an Operations Manager working for UK Specialty, Canopus. KGM is a member of the Canopus Group in the UK Specialty Division. I am responsible for managing the timely and accurate processing of all client records supplied to us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



KGM Motor Insurance
 KGM House
 14 Eastwood Close
 South Woodford
 London E18 1RZ
 UK

T +44 (0)20 8530 7351
 F +44 (0)20 8530 8547
 T +44 (0)844 412 6412 Claims
 F +44 (0)20 8530 7037 Claims
 www.kgminsurance.co.uk
 www.canopus.com

Registered in England and Wales No 01514453
 Registered Office Gallery 9 One Lime Street London EC3M 7HA
 KGM Motor Insurance is a brand name for business written by
 Syndicate 260 which is managed by Canopus Managing Agents Limited
 Authorised by the Prudential Regulation Authority and regulated by the
 Financial Conduct Authority and the Prudential Regulation Authority

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: 11/2/15.....

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: .....