

Bad
Character



CPS

PRIVATE

Michael Carroll & Co
Solicitors
DX 36206
Edmonton

6th August 2013

01MS0218813

Dear Sir Madam

DEFENDANT(S): Simon Paul CORDELL

URN: 01MS0218813

COURT AND HEARING DATE: Woolwich Crown Court 4th September, 2013

Please find attached a copy of the Crown's Bad Character Application.

Yours faithfully

CPS

Trial Preparation Team Croydon CC, Kingston CC & Woolwich CC

3rd Floor
One Drummond Gate
Pimlico
London
SW1V 2QZ

DX: 161330 Victoria 19

Email: croydonkingston&woolwichcrown@cps.gsi.gov.uk

**NOTICE TO INTRODUCE EVIDENCE OF A DEFENDANT'S
BAD CHARACTER** *(Criminal Procedure Rules, rule 35.4(2))*

Case details

Name of defendant: Simon Paul CORDELL

Court: Woolwich Crown Court

Case reference number: 01MS0218813

Charge(s): Burglary

This notice is given by [the prosecutor]

I want to introduce evidence of the bad character of Simon Paul CORDELL on the following ground(s) in the Criminal Justice Act 2003:

- ☐ it is important explanatory evidence: s.101(1)(c).
- ☒ it is relevant to an important matter in issue between that defendant and the prosecution: s.101(1)(d).
- ☐ it has substantial probative value in relation to an important matter in issue between that defendant and a co-defendant: s.101(1)(e).
- ☐ it is evidence to correct a false impression given by that defendant: s.101(1)(f).
- ☐ that defendant has made an attack on another person's character: s.101(1)(g).

How to use this form.

1. Complete the boxes above and give the details required in the boxes below. If you use an electronic version of this form, the boxes will expand. If you use a paper version and need more space, you may attach extra sheets.

2. Sign and date the completed form.

3. Send a copy of the completed form to:
 (a) the court, and
 (b) each other party to the case.

Notes:

1. You must send this form so as to reach the recipients within the time prescribed by Criminal Procedure Rule 35.4(3) or (4). The court may extend that time limit, **but if you are late you must explain why.**
2. A party who objects to the introduction of the evidence must apply to the court under Criminal Procedure Rule 35.4(5) **not more than 14 days after service of this notice.**

1) Facts of the misconduct. If the misconduct is a previous conviction, explain whether you rely on (a) the fact of that conviction, or (b) the circumstances of that offence. If (b), set out the facts on which you rely.

The prosecution applies to adduce the defendant's previous convictions for theft dated 25.07.2008 and 10.10.2009 which can be found as items 28 and 31 on his list of previous convictions.