

From: Josephine Ward <josie@michaelcarrollandco.com>
Sent time: 16/09/2016 01:40:59 PM
To: re_wired@ymail.com; lorraine32@blueyonder.co.uk
Subject: Fwd: SIMON CORDELL
Attachments: c100781_130920164473_001.pdf.pdf

Lorraine / Simon

This is the disclosure that the Respondent states they sent to Michael Carroll & Co in August 2016. I made enquiries with staff at Michael Carroll & Co and I was told that this had not been received. This was sent to my email on Tuesday but I do not have access to that email on my phone but have to be near a desk top computer. I am forwarding this to you now.

I am waiting for Andrew Locke's court note from today's hearing and I will revert to you in writing re the solicitor / barrister / client relationship and whether either Andrew Locke or I can continue to represent you in this matter.

Josephine

----- Original Message -----

From: Sally.Gilchrist@met.pnn.police.uk
To: josie@michaelcarrollandco.com
Date: 13 September 2016 at 14:56
Subject: SIMON CORDELL

Dear Sirs,

Please see attached correspondence sent to you by DX on 17th August 2016.

Yours faithfully

Sally Gilchrist

Total Policing is the Met's commitment to be on the streets and in your communities to catch offenders, prevent crime and support victims. We are here for London, working with you to make our capital safer.

Consider our environment - please do not print this email unless absolutely necessary.

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**METROPOLITAN
POLICE**

TOTAL POLICING

17th August 2016

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Enquiries to: Sally Gilchrist

Direct line: 020 7230 3879
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Your ref: JW/CORDELL/APPEAL AGAINST
IMPOSITION OF ASBO

Our ref: 107087/SAG

sally.gilchrist@met.police.uk
Service not accepted by e-mail

Dear Sirs

**Re: Simon Cordell- v- The Commissioner of Police of the Metropolis
Appeal against ASBO hearing 26th-28th September 2016**

Further to the court's directions on 4th April 2016, I enclose copies of the following documents:-

1. Schedule of Incidents
2. Witness statements DC Elsmore dated 11/8/2016 and Canary Wharf Incident Report number 74507 dated 12/1/2013.
3. Hearsay Notice dated 17/8/2016.

I confirm that I have sent copies of the enclosed documents to Wood Green Crown Court.

Kindly acknowledge receipt.

Yours faithfully

**Sally Gilchrist
Chartered Legal Executive**

Lexcel
Practice Management Standard
Law Society Accredited

IN THE WOOD GREEN CROWN COURT

CASE No: A20150064

**IN THE MATTER OF AN APPEAL AGAINST AN ANTI-SOCIAL BEHAVIOUR
ORDER (CRIME AND DISORDER ACT 1998, SECTION 4)**

B E T W E E N:

SIMON CORDELL

Appellant

and

THE COMMISSIONER OF POLICE OF THE METROPOLIS

Respondent

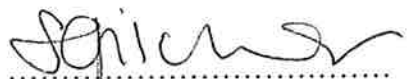
SCHEDULE OF INCIDENTS

DATE	TIME	LOCATION	INCIDENT
12th January 2013	0212 hours	Canary Wharf, E14.	Report from Canary Wharf of Appellant's vehicle registration number MA57LDY gaining entry and carrying equipment for a rave at Wood Wharf.
24th May 2013	2030 hours	Disused Old Ponders End Police Station, Enfield.	Police responded to reports of a suspect at the premises. On arrival the Appellant was seen exiting an alleyway to the side of the station. Joshua HOLLY-FIELD popped his head over the boarding and climbed over at request of police. Initially HOLLY-FIELD said he was trespassing and referred police to his lawyer, who it transpired was the Appellant. HOLLY-FIELD eventually told police that he and the Appellant were looking for a venue for a rave over the bank holiday.
25th May 2014	2321 hours	Unit 5, St Georges Industrial Estate, White Hart Lane N17	Report of trespassers in Unit by security guard. Police attended and found approx 20 young people who ran out of the premises. Several males remained and claimed to be squatters. The Appellant in his

			white ford transit van reg no CX52JPZ tried to leave the premises. The van contained large speakers and music equipment.
6th to 8th June 2014	Reported to police by telephone at various times on 7th June and 8th June 2014.	Empty warehouse in Progress Way, Great Cambridge Road, Enfield EN1 1SH.	Police attended a rave but were unable to close it down due to there not being enough police units available. Appellant had an organisational role and/or supplied equipment for a rave at the premises. The rave caused significant disturbance to locals.
20th June 2014	2342 hours	1 Falcon Road, Neasden Lane, NW10	Police closed down rave which was being set up. The Appellant's white Ford Transit van registration number CX52JRZ, containing sound equipment removed from the site.
19th July 2014	2205hours	Carpet Right showroom, A10, Great Cambridge Road, Enfield. (empty premises)	Police attended premises and closed down a rave. The Appellant admitted he was the organiser. Music system was loaded in to a white van registration number PE52UHW, owned by Elliot LAIDLER, who worked for the Appellant.
24th July 2014	1625 hours	Alma Road, EN3	Police stopped Appellant driving a silver Ford Focus reg no MA57LDY. During a conversation with officers, the Appellant bragged about organising raves.
27th July 2014	1454 hours	Between Greggs and Pugh Charles Glass, Millmarsh Lane, Enfield	Police received information that a rave would take place that evening. There was sound equipment powered by the Appellant's white ford transit van, registration number CX52JRZ.
9th and 10th August 2014	Attended on 9th August at 2230 hours until about 0130	North footway, by Greggs Factory, Millmarsh Lane, Enfield	Police attended and broke up a rave. Appellant present at premises with his silver ford focus car, reg no MA57LDY, which contained industrial gas

	on 10 th August		bottles. The Appellant had an organisational role and/or supplied equipment for a rave at the premises. As police sought to prevent access to the site and close the rave, the Appellant encouraged a crowd of people to overrun the police. The incident caused major disruption to the public and required the deployment of significant police resources.
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Dated this 17th August 2016



On behalf of the Respondent
Directorate of Legal Services
Metropolitan Police Service
10 Lamb's Conduit Street
London
WC1N 3NR
Ref 107087/SAG

To the Court and the Appellant

IN THE WOOD GREEN CROWN COURT

CASE No: A20150064

IN THE MATTER OF AN APPEAL AGAINST AN ANTI-SOCIAL
BEHAVIOUR ORDER (CRIME AND DISORDER ACT 1998, SECTION 4)

B E T W E E N:

SIMON CORDELL

Appellant

and

THE COMMISSIONER OF POLICE OF THE METROPOLIS

Respondent

HEARSAY NOTICE

TAKE NOTICE that the Applicant intends pursuant to the Magistrates' Court (Hearsay in Civil Proceedings) Rules 1999 to adduce hearsay evidence at the hearing of the appeal against the Anti-Social Behaviour Order dated 4 August 2015 in the form of:

- (1) An incident report from the Canary Wharf Group made by various officers from that Company and attached to Crimint HTRT00376798 on the Crime Report Information System (CRIMINT), which can be found at pages 152 and 153 in the Respondent's Appeal Bundle.

AND TAKE FURTHER NOTICE that the officers who made the entries in the aforementioned Incident Report should not be called as witnesses as the Respondent believes that it is disproportionate in the context of this case to call these witnesses to give oral evidence and that to do so would not be an efficient use of police and public resources.

You have seven days from the date of service on you of this notice to make an application to the Wood Green Crown Court for permission to call the aforementioned witnesses to be cross examined.

Dated this 17th day of August 2016

Signed 

On behalf of the Respondent
Directorate of Legal Services
Metropolitan Police Service
10 Lambs Conduit Street
London
WC1N 3NR
Reference 107087/SAG

To the Court and Appellant

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WITNESS STATEMENT

CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of Steve ELSMORE..... URN:

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Age if under 18 **Over 18**..... (if over 18 insert 'over 18') Occupation: **Police Officer**.....

This statement (consisting of: **1**..... pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything in it which I know to be false, or do not believe to be true.

Signature: ..... Date: 11/08/2016.....

Tick if witness evidence is visually recorded (supply witness details on rear)

I am Steve Elsmore, a Police officer attached to the Anti Social Behaviour Team within the London Borough of Enfield. I make this further statement regarding an ASBO matter in relation to Simon CORDELL.


On 16th May 2016, I was asked to check timings in relation to the schedule that is due to be served on the court.

Whilst searching for timings for Crimint HTRT00376798, I found an incident log attached to this Crimint. I do not recall previously seeing this log. Usually the inputting officer would put an indicator on the Crimint to say that there is an attachment. On this occasion there is no indicator referring to this attachment. It is possible that I may have previously missed this attachment due to the volume of incidents that I was searching through.

The attachment itself is an incident report from Canary Wharf Group and the incident summary states - Trespassers on site - illegal rave - forced entry shed 4 - Police tasked - no action - group left site. This is dated 12 January 2013.

The incident log details what action was taken by Canary Wharf Group during this particular incident. It also provides detail on the impact to the residents. On page 5 of the incident log there is an entry that states "P BOUZON (CW178) informs the ECC that the vehicle registrations that he gave me are actually the 2 vehicles that gained access through the fence and are located within the Shed 4 area".

One of the vehicles is MA57LDY. This vehicle was registered to Simon CORDELL as per the Crimint Report.

Signature: ..... Signature witnessed by:

CANARY WHARF GROUP

INCIDENT REPORT

Report Number 74507

Incident type	Non Crime / Suspicious / Trespasser
Incident title	Trespassers on site - Illegal rave - Forced entry Shed 4 - Police tasked - No Police action - Group left site
Incident started	January 12, 2013 02:12
Incident ended	January 12, 2013 08:00
Incident Opened By	Chris Duffy
Number of incident updates	25
Incident status	Open
Location	Wood Wharf
Premises	CANARY WHARF MANAGEMENT LIMITED
Incident Summary	Trespassers on site - Illegal rave - Forced entry Shed 4 - Police tasked - No Police action - Group left site

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Incident Report 74507 - January 14, 2013 11:15 - Debra Redwin

Update: 74507-L1 Operator: Chris Duffy
Entered at: January 12, 2013 02:57 Occurred at: January 12, 2013 02:12

02:12hrs C DUFFY (E15) received a call from S BONNER (E4) who reported that he is on a External patrol with K WICKS (CW174) outside the Paintball sheds by Lutomer house and there is music coming from one of the buildings. (E4) also stated that a sign has been put up to the effect of "this is our home, someone is here 24/7 and you will need a court order to evict us". E4 reported that he will investigate further.

02:20hrs S BONNER (E4) reports that there are 60-70 youths having an illegal rave in the paintball sheds. It is believed that they removed our padlock and have placed their own one in its place locking themselves inside. (E4) requests that C BROWN (CW03) be informed.

02:21hrs C BROWN (CW03) message left on company mobile.

02:24hrs C BROWN (CW03) message left on home phone answer machine and pager message left.

02:28hrs (E4) reports that there could be upwards of 80-100 youths and there is a strong smell of drugs coming from the property. E4 asked that the police be tasked.

02:29hrs Police tasked. CAD reference number 1122. No eta provided. Limehouse police station given the SDM company mobile number at their request.

02:35hrs C BROWN (CW03) contacted the ECC and is transferred to S BONNER (E4).

02:36hrs (E4) requests that K TROBIRDGE (CW02) be informed. Message left on (CW02) pager

02:38hrs (E4) reports that K WICKS (CW174) conducted a Perimter patrol at around 00:00hrs and there was no indication of forced entry or music coming from the property. It is believed the youths entered after this time.

02:41hrs (E4) requests that M MAER (CW01), S GRIEG and P TWEDDLE be informed. Messages left with S GRIEG and P TWEDDLE. M MAER (CW01) briefed.

02:44hrs (E4) requests that K TROBRIDGE (CW02) be contacted at home. (CW02) contacted at home and informed of the situation.

03:00hrs Calls received from C BROWN (CW03), S GRIEG and P TWEDDLE. No further updates available.

03:05hrs C DUFFY (E15) contacted Limehouse IBO for an update on an eta. IBO report that the section chief is due to attend but they cannot provide and eta as yet.

Update: 74507-L2 Operator: Chris Duffy
Entered at: January 12, 2013 03:03 Occurred at: January 12, 2013 03:13

Information update - there has been no additional/unusual vehicle movements in and around Lumtomer house indicating that the youths may have entered on foot.

Update: 74507-L3 Operator: Chris Duffy
Entered at: January 12, 2013 03:12 Occurred at: January 12, 2013 03:21

Information update - S BONNER (E4) reports that the ravers are entering Shed 4 via a hole in the fence off of Prestons road. They have stated that they intend to squat in the premises and Canary Wharf will require a court order to remove them.

Update: 74507-L4 Operator: Chris Duffy
Entered at: January 12, 2013 03:15 Occurred at: January 12, 2013 03:27

Copy of notice found on gate attached.

Update: 74507-L5 Operator: Chris Duffy
Entered at: January 12, 2013 03:27 Occurred at: January 12, 2013 03:40

(E4) reports that the police are in attendance.

Incident Report 74507 - January 14, 2013 11:15 - Debra Redwin

Update: 74507-L6 Operator: Chris Duffy
Entered at: January 12, 2013 03:31 Occurred at: January 12, 2013 03:43
Update E-mailed to P TWEDDLE, S GRIEG, M MAER (CW01), K TROBRIDGE (CW02) and C BROWN (CW03)

Update: 74507-L7 Operator: Chris Duffy
Entered at: January 12, 2013 03:33 Occurred at: January 12, 2013 03:45
S BONNER (E4)

Update: 74507-L8 Operator: Chris Duffy
Entered at: January 12, 2013 03:35 Occurred at: January 12, 2013 03:46
(E4) reports that he has received a call MARK LUDLOW who has spoken with CRAIG SCHERER reference the possibility of isolating the power to the premises however C SCHERER has stated that it could only be achieved from inside the building.

Update: 74507-L9 Operator: Kevin Evans
Entered at: January 12, 2013 04:10 Occurred at: January 12, 2013 04:20
03:50hrs Call received from PHIL TWEDDLE regarding the power to the venue. MARK LUDLOW will arrive shortly with an Electrician to ascertain a way to isolate power to the venue as they are using our power.
04:00hrs Call received from E4 regarding the arrival of the Tower Hamlets Environmental Monitoring Unit. They were there to await the arrival of the police who are now unable to attend due to lack of available resources.
Contact details RAZ HAQUE 0207 3646702.
04:10hrs The Tower Hamlets Environmental Monitoring Unit have now departed.

Update: 74507-L10 Operator: Chris Duffy
Entered at: January 12, 2013 04:14 Occurred at: January 12, 2013 04:23
S BONNER (E4) reports that the mobile police patrol unit HT73 has stated that they have limited powers with which to deal with the trespassers now that they are in the unit.
Complaints have been received by the police from local residents about the noise and the music has been turned down.
Numbers are now dwindling and approximately 60 people are now in attendance.
Update E-mailed to P TWEDDLE, S GRIEG, M MAER (CW01), K TROBRIDGE (CW02) and C BROWN (CW03)

Update: 74507-L11 Operator: Chris Duffy
Entered at: January 12, 2013 04:15 Occurred at: January 12, 2013 04:27
(E4) stated that he will contact K TROBRIDGE (CW02) and C BROWN (CW03).

Update: 74507-L12 Operator: Kevin Evans
Entered at: January 12, 2013 04:16 Occurred at: January 12, 2013 04:25
E-Mail received from PHIL TWEDDLE stating that MARK LUDLOW has visited the venue who reported that they have their own power systems within the venue in the form of mini generators.

Incident Report 74507 - January 14, 2013 11:15 - Debra Redwin

Update: 74507-L13 Operator: Chris Duffy
Entered at: January 12, 2013 04:18 Occurred at: January 12, 2013 04:29

Title and summary updated.

Update: 74507-L14 Operator: Chris Duffy
Entered at: January 12, 2013 04:20 Occurred at: January 12, 2013 04:31

Information update - due to the extremely limited camera coverage and ambient light levels there is no usable footage of the incident.

Update: 74507-L15 Operator: Sabrina Bosser
Entered at: January 12, 2013 04:49 Occurred at: January 12, 2013 04:57

C CARLTON (CW196) from Blackwall Barrier informed the ECC that the occupants of a black VW - VRN - D4NLP came through Blackwall barrier and were enquiring about the rave, they had the complete post code of the venue for the illegal rave. The car has left site via TRAFALGAR WAY towards the venue.

K EVANS (CW237) updated S BONNER (E4)

Update: 74507-L16 Operator: Chris Duffy
Entered at: January 12, 2013 04:58 Occurred at: January 12, 2013 05:06

S BONNER (E4) reports that C BROWN (CW03) is on site and has asked that a padlock and chain be taken down to the Lutomer house gates as there are now vehicles enquiring about the rave. (CW03) has stated that we will allow those in the premises to leave but must have a call sign in position to prevent further access into the compound.

The attendees have stated that the event is supposedly due to finish at 07:00hrs.

Update: 74507-L17 Operator: Chris Duffy
Entered at: January 12, 2013 05:01 Occurred at: January 12, 2013 05:12

Information update - Post code supplied by vehicle at Blackwall barrier was E14 Love Grove walk. Barriers briefed reference further enquiries for the location of the rave and not to divulge any information.

Update E-mailed to P TWEDDLE, S GRIEG, M MAER (CW01), K TROBRIDGE (CW02) and C BROWN (CW03)

Update: 74507-L18 Operator: Kevin Evans
Entered at: January 12, 2013 05:06 Occurred at: January 12, 2013 05:15

K EVANS (CW237) reports placing a liaison call to Billingsgate Security advising them of the situation at Wood Wharf and to discourage any individuals asking for the location of the Rave.

Update: 74507-L19 Operator: Norman Harris
Entered at: January 12, 2013 06:13 Occurred at: January 12, 2013 06:21

G LOWERY (CW219) Informs the ECC that MARK LUDLOW (infra maintenance) entering Lutomer House and are going to attempt to cut the power

S WATERS (B3) Informed

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Incident Report 74507 - January 14, 2013 11:15 - Debra Redwin

Update: 74507-L20 Operator: Norman Harris
Entered at: January 12, 2013 06:15 Occurred at: January 12, 2013 06:26

G LOWERY (CW219) Informs the ECC that MARK LUDLOW has now left Lutomer house and did not cut the power

Update: 74507-L21 Operator: Henry Havis
Entered at: January 12, 2013 08:10 Occurred at: January 12, 2013 08:12

S WATERS (B3) contacted the ECC and advised that at 0800hrs the last dozen participants of the 'rave' have left site. It was noticed that 1 of the group was bleeding (Details of injury unknown) and they were attending Hospital. It is thought that the injury happened due to an altercation between the group.

Infrastructure Management are taking steps to secure the breach in the fence and restrict further vehicle access.

An electrician has also been tasked to isolate the power to the site.

CW Security are remaining in location until further notice.

Senior CWG Management informed via email.

There is no CCTV of the area and no photos were taken with the hand-held camera as it was thought this would aggravate the situation.

Police updated on 101.

Update: 74507-L22 Operator: Derek Beswick
Entered at: January 12, 2013 15:23 Occurred at: January 12, 2013 15:33

S GREIG informs the ECC that Electricians have been tasked to isolate power to the site.

A new padlock and chain are being fitted in place of the old ones, the key will be left with the Infrastructure Call sign who is currently on guard at Lutomer House.

This key will then be picked up by S GREIG on Monday 14 - 01 - 13

Update: 74507-L23 Operator: Merlisa Cheer
Entered at: January 12, 2013 16:14 Occurred at: January 12, 2013 16:12

A DEVINE (CW164) informs the ECC that he has been approached by 2 x members of the public in reference to the illegal rave that happened last night (11-01-13)

The 2 x members of the public have informed A DEVINE (CW164) that they heard the commotion at approx 22:00hrs last night and noticed that there was people going into the shed 4 area via the fence but because they was wearing Hi-Viz they didn't think that there was anything untoward going on and carried on with their evening.

They also added that the music got turned up at 01:30hrs this morning 12-01-13 and that is when they realised that it was a rave that was taking place.

The persons live right opposite Shed 4 were the hole was placed in the fence so they said that they did witness them breaking in.

A DEVINE (CW164) was unable to get name or details from the persons but has stated that he will try and get details from them as they leave the Wood Wharf area.

Update: 74507-L24 Operator: Henry Havis
Entered at: January 12, 2013 17:03 Occurred at: January 12, 2013 17:15

Email from C SCHERER (IFM) to P TWEDDLE (Co-MD):

From 15:00 when we all viewed the building, I have now had the power within turned off and the appropriate fuses removed. Having sent communication earlier this morning to David Lindop / Joe Bowman, I have not heard back from either, but will inform accordingly and hand over the fuses.

Incident Report 74507 - January 14, 2013 11:15 - Debra Redwin

All external doors have now been closed, so the building is as secure as we can make it until we review and carry out more work on Monday morning.

This comment also applies to the damaged fence.

I am now taking a replacement padlock and chain to replace the one cut off during the break in, to the gate where concrete Jersey Blocks have now been positioned.

I shall leave the key with the patrol guard(s), who are now in place and collect this from them on Monday morning.

Leaving site now, though available on the phone if needed.

Update: 74507-L25

Operator: Merlisa Cheer

Entered at: January 13, 2013 06:11

Occurred at: January 12, 2013 17:20

P B0UZON (CW178) informs the ECC that the Vehicle registrations that he gave me are actually the 2 vehicles that gained access through the fence and are located within the Shed 4 area.

Vehicles and details as follows:

1st Vehicle

Make: Mercedes

Model: Sprinter van

Colour: White

Company: Interlink Express

VRN: YK60XJM

2nd Vehicle

Make: Ford

Model: Focus

Colour: Silver

VRN: MA57LDY
