

**From:** JOSEPHINE WARD <josephinewardsolicitor@gmail.com>  
**Sent time:** 08/09/2016 04:01:40 PM  
**To:** Lorraine Cordell <lorraine32@blueyonder.co.uk>; too smooth <re\_wired@ymail.com>  
**Subject:** Re: Proposed letter for Commissioner of Metropolitan Polcie  
**Attachments:** Specific disclosure requests by Simon Cordell 08.09.2016.docx

---

Lorraine / Simon

Simon I do not believe that it is in your best interests for me to serve the suggested amendments to the letter that I proposed sending to the Ms Sally Gilchrist. The reason for this advice is similar to the advice given to you by Mr Morris on 4th April 2016 and you decided to ignore his advice. A lot of the matters you raise I have previously advised you can be dealt with by cross examination. Your instructions are simply that you have not organised, provided equipment or been concerned in the organisation of illegal raves. In relation to all events with the exception of Millmarsh Lane you dispute providing equipment or any intention to hold any events. In some you are visiting friends who are homeless and have a LAPSO notice up confirming they are treating the building as their residence. The legal technicality you refer to i.e. absence of trespass does not prevent any parties from being held at the buildings in question as amounting to anti social behaviour. You are well aware of how anti social behaviour is defined and loud music being played over two nights would satisfy this definition as it undoubtedly causes noise nuisance and distress to neighbours. Your defence to Progress Way is denying being in attendance inside the premises on any occasion and you merely dropped off keys. The question as to whether the premises were being squatted and the appropriate notice was on display to prevent trespass does not affect whether anti social behaviour was caused. I have advised you that championing the rights of persons squatting in a building to hold a party where a couple of hundred people attend and justifying the event as not being a rave due to lack of trespass does not prevent the event from causing anti-social behaviour. Anti social behaviour was clearly caused as a result of the Progress Way event. There is a significant risk that you will alienate the Judge if you advance the argument that anyone squatting can hold a loud party. The loud parties cause anti-social behaviour regardless of trespass / rave definition being satisfied.

I ask you to reconsider whether the attached document should be served on the Respondent. This document I have copied and pasted from the amendments you made to the letter that I sent to you. The views you expressed in the letter and the requests made were your requests and legal challenges so I have changed "we" to, "I, Simon Cordell" to reflect this. My view is that this document should not be sent but if you insist then please confirm this in writing. Type in your signature and email back to me please.

Mr Andy Locke is available for a conference on 13th September 2016 at his Chambers and following this conference a decision will be made whether to list the case for lack of disclosure or not.

Please confirm your instructions on the service of the attached word document. I reiterate that I do not believe that it is in your interests to serve the document.

Regards

Josephine

On Thu, Sep 8, 2016 at 2:15 PM, Lorraine Cordell <[lorraine32@blueyonder.co.uk](mailto:lorraine32@blueyonder.co.uk)> wrote:

Josey please see letter back from Simon

---

**From:** JOSEPHINE WARD [mailto:[josephinewardsolicitor@gmail.com](mailto:josephinewardsolicitor@gmail.com)]  
**Sent:** 08 September 2016 12:51  
**To:** Lorraine Cordell  
**Subject:** Proposed letter for Commissioner of Metropolitan Polcie

Lorraine

Please confirm whether there are any additions that Simon wants included in this letter. I need to send this document across within the next hour.

Many thanks

Josephine

Specific disclosure requests by  
Mr Simon Cordell who insists the below is forwarded.

I, Simon Cordell am of the view that a lot of the CAD's are fabricated and being used in support of this ongoing appeal.

Such as the Progress Way matters that is in reference to completely different geographical locations, some distance away from Progress Way.

The redacting of the CAD messages makes this extremely difficult to stand a fair trial against under my Human Rights, Article Six the Right to a fair trial.

Referring to the Grid numbers contained in the respondents bundle that do show that a large amount of the evidence being relied upon does in fact show wrong locations, leading further towards the matter of concerns regarding the CADs, when taking a clear insight to CAD 1047 of the 8<sup>TH</sup> June 2014, That does state the call name of a police officer on duty as PC Shink, who's grid reference location was 534380, 195513 this insight leads to other issues of concern to be highlighted and them issues being that of a vast majority of all other CADS relating to progress way, do in fact having the same Grid number as the officer on duty PC Shink, but on each CAD, the Call name has been redacted Mr Simon Cordell believes the cads are of police officers not civil people and asks for the to be redacted.

I, Simon Cordell request all CADs / crime reports for all events cited in the ASBO application where reference is made to police attending the location in response to crimes being committed. This includes all incident numbers that do not include the relevant Cad intelligence contained in linked explicitly to and Linked implicitly to, that is relevant to the bundle so that I can stand a fair appeal, this is to include crown roads party at the old man building on the 6<sup>th</sup> 7<sup>th</sup> 8<sup>th</sup> June 2014 as in cad 3319 and mutable others CADS.

I, Simon Cordell request disclosure of the CCTV of the persons breaking in to the premises on the 25th May 2014, the CRIS and details of any persons arrested for criminal damage / burglary.

I, Simon Cordell request the full details of the original intelligence report inputted on 25th May 2014 and also reasons why there was a need to update this report on 19th June 2014. The Intelligence report should not be allowed in evidence under the hearsay rules as it is prejudicial to me. The report has been amended.

I, Simon Cordell question the accuracy and truthfulness of the statements, CADS etc served in support of the above. I also question why some of the CAD reports have been redacted. I believe that the CAD's may well confirm the names of the real organisers, vehicle registrations etc that will confirm no vehicle belonging to the Appellant being inside the venue. I also question the chronological sequence of the CAD reports due to the time stamps.

<b>CAD</b>	<b>Num</b>	<b>Date</b>	<b>Time</b>	<b>Page</b>
<b>CAD</b>	<b>2637</b>	<b>07/06/2014</b>	<b>08:18</b>	<b>Page 191 to 195</b>

CAD	2672	07/06/2014	08:16	Page 196 to 198
CAD	3005	07/06/2014	09:22	Page 203 to 205
CAD	3037	07/06/2014	09:20	Page 179 to 183
CAD	10481	07/06/2014	22:47	Page 233 to 237
CAD	10506	07/06/2014	22:44	Page 238 to 241

I, Simon Cordell specifically ask the Respondent to confirm why the event was not closed down or proof of trespass or evidence of profit being made as required under the licensing act 2003 and section 63 of the CJPOA, if it was in fact a rave.

I, Simon Cordell also asks why went the sound system's not seized under section 63 of the CJPOA.

I, Simon Cordell seek clarification as whether a section 144 LAPSO notice was on display or tress pass had taken place.

I, Simon Cordell question why the Respondent has not supplied any Cads from 6th June 2014; which is in fact the date when this event started and why so many Cads' are missing from the 07th and the 08th June 2014.

ALMA ROAD – 24TH JULY 2014, I Simon Cordell will state that this date should be struck from the Respondent's bundle as there was no rave / Event.

I, Simon Cordell will argue that the court was wrong in principle in granting the original ASBO application as the Respondent made the original application based on me being involved in illegal raves. The Respondent did not establish this at the initial hearing and the District Judge erred in granting this ASBO.

It has been noted and said by PC Parcel that the I am known for class A drugs and or supplying drugs this was proved not to be true as can be read in a copy of the magistrates court transcripts and that of the district judge agreeing to take no weight in such statements, why has this not yet been deducted?

In the interests of a fair hearing I, Simon Cordell request all Cad's cross linked and referred to should be served in an unedited format.

I feel that contained in the respondents bundle that there is so many fabricated irregularities, that they should be investigated and I feel without this being done I will not stand a fair trial.

I also believe that all the anonymous witnesses are police officers. I do not believe that they are civilian witnesses and I require all anonymous witnesses to attend court to give evidence.

I, Simon Cordell also request that all disclosure is made in respect of the raves at the Old Man Building, Crown Road on 6<sup>th</sup>, 7<sup>th</sup> and 8<sup>th</sup> June 2016.

Signed: .....

Dated: .....