


**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

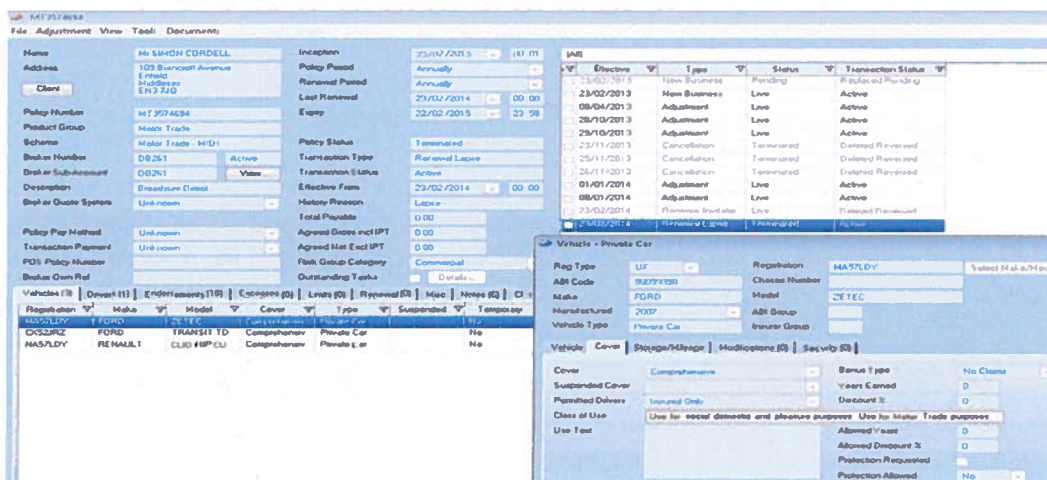
I work for KGM Motor Insurance, an Insurance Company based in London. I am an Operations Manager working for UK Specialty, Canopus. KGM is a member of the Canopus Group in the UK Specialty Division. I am responsible for managing the timely and accurate processing of all client records supplied to us 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 5<sup>th</sup> March 2015 at Kingston Upon Thames Crown Court.

I would confirm that –

- The policy was incepted 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 –



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:  .....