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To: croydonkingston&woolwichcrown@cps.gsi.gov.uk; listing@woolwich.crowncourt.gsi.gov.uk; J.B. Akin-Olugbade; Lorraine Cordell; too smooth; Del Edgeler; Mark.Tomlinson@cps.gsi.gov.uk

Subject: Regina v. Simon Cordell for mention at Woolwich Crown Court on Wednesday 21st May 2014

Dear Sir or Madam

We continue to act on behalf of Mr Simon Cordell in relation to an allegation of burglary.

As you are aware this case was in court on 8th April 2014 for a mention hearing before his Honour Judge Shorrock. On that occasion the Learned Judge made directions as to the service of crime scene photographs from February 2014 (as referred to in the statement of Paul Michael Whittaker dated 25th March 2014). There are 14 photographs referred to in the statement but we have not been provided with an album containing the pictures of indeed a photograph.

In addition we have not been served with the statement from the Council regarding the noise abatement. We will forward under separate cover copies of a section 80 noise abatement notice and a notice prohibiting the sale of alcohol at the planned party in Bianca Road that Mr Cordell's mother secured from the Council under a section 35 application. It appears as though there is confusion as to the venue address and indeed the venue referred to in the noise abatement notice (Bianca Road) and the alleged burgled premises appear to be one and the same albeit the burglary is charged under the address of Unit 3-4 Haymerle Road, Peckham, London, SE15 6SA as opposed to Bianca Road.

We also request that the prosecution clarify specifically what the particulars of the charge is against Mr Cordell as in the advance information he was charged with loss of stock to the value of £8220. Mr Patel in his statement dated 8th May 2013 refers to loss and also damage. The damage is estimated at £8,000 - £10,000. In the case papers there is reference to a burglary and the items being stolen being a gazebo and also a chair. With regards to the gazebo Mr Cordell will bring to court a copy of an invoice that he has confirming that he purchased this item and therefore this could not have come from any burglary. In addition the invoices provided in the case papers do not have listed the chair seized from Mr Cordell's home address. The chair listed on the invoices provided by Mr Patel refer to Monaco mutli position chairs whereas the chair removed from Mr Cordells' address is a Venice chair. The photograph provided is of a Venice chair and not a Monaco chair..

We seek clarification as to the particulars of the burglary charge as if the charge is to be amended to damage caused. There have to date been three burglaries at the premises, one in February 2013, one in March 2013 and one in May 2013. We know from the insurance documents that Nikki Diamond visited the site on 28th February 2013 and updated the broker on 2nd April 2013 damage being described as access holes being knocked through in the walls to gain access and an additional two access points were discovered. reference is made to damage to the rook also. There is also a comment made that there is no way to differentiate which damage was caused when. We know that there are crime scene photographs in relation to the February 2013 offence and these need to be compared to the crime scene photographs in relation to the May 2013 offence.

We also request that the officer in the case clarify the position with regards to the invoices and the date when they were obtained from Mr Patel. The invoices that we are specifically making reference to are the ones dated 1st March 2013 and 29th March 2013 which itemise identical damage. The optional extras recommended are identical also. Mr Trevor Allway from the Insurance company confirmed that he never received the invoices / estimates from Mr Patel and he checked with Nikki Diamond whether she had seen the invoices and she stated that they had not been provided to the insurance company. Indeed from the insurance file there is an email from Simone Sailman requesting repair quotations from Deven Patel (dated 24th April 2013) but the invoices provided by Mr Patel to the police are clearly dated 1st March 2013 and 29th March 2013. Our query is why were these not

provided to the insurance company? We request the date that these invoices were provided to the police. The estimate itemising the damage dated 5th September 2013 appears to correspond to damage itemised in a telephone call to the insurance broker by Nicola Diamond on 2nd April 2013 at 15:04:00 with additions. The estimate for this damage is £39420.00. Mr Patel in his statement dated 8th May 2013 estimates the damage as being between £8,000 - £10,000. Yet the invoice dated 5th September 2013 substantially increases the estimate by some £30,000. The invoices dated in March only refer to re-bricking one wall at a cost of £600 yet Nicola Diamond refers to at least three entry points.

The statement of Mr Rakesh Patel dated 10th March 2014 gives us cause for concern as he has produced two invoices that never appear to have been provided to his insurance company. He also makes reference to his manager reporting the burglary but not been given a crime reference. We request that a statement be taken from this Manager and in particular that the Manager confirms the damage that was caused and the value of the stock stolen and how this amount was reconciled to stock in the warehouse.

We are also concerned as police attended on the night of the rave in May 2013 and the damage to the wall would have been apparent to the police. In addition we find it bizarre that there were no additional police patrols in the area on the night of a rave. Our client is adamant that police officers attended on the night in question and were powerless to stop the rave / private party from taking place because there were people squatting inside the premises and notices on the walls clearly stating that the premises were being used as legal squats. The police officers who attended on the night of the rave / private party can confirm that there was damage already in existence and also that the premises were a legal squat. This would contradict the statement of Inspector Mc Millan dated 31st March 2014 who stated that there were no obvious notices / signs indicating squatters rights.

We therefore request that the officer in the case make enquiries in relation to the Bianca Road address as referred to in the section 80 notices.

We request that this case be listed for mention on Wednesday 21st May 2014 in order that the above can be clarified and also that our client's bail conditions are clarified, in particular our client seeks the return of his passport.

We await the confirmation of the listing in due course.

Yours faithfully

MICHAEL CARROLL & CO.