[To Parent Directory]

CASE 1 AND CASE 2
CHRONOLOGICAL PAGINATION INDEX

CROWN PROSECUTION SERVICE
Rex
V1
Simon Paul CORDELL

Date of the Document: 17/02/2026
Consisting of 6 Of 6 Page{s)
Date of Update: C3

- **Urgent: Case 1 URN: 01YE1267925, Date of Case1**: 04/08/2025
- **Urgent: Case 2 URN: 01YE1300125, Date of Case2**: 26/08/2025 Case Discontinued!

INTRODUCTION FOR SERVICE
This Document Is Served As A Defence Bundle: pursuant to the "**Criminal Procedure Rules.**" It contains a "**Consolidated Chronological Pagination Index of the disclosed and requested Defence Files"** covering "**Case 1 – 02/08/2025,"** that is prepared to assist the Court and the Crown Prosecution Service in reviewing the combined evidential material.

The bundle includes all relevant disclosed documents, defence exhibits, defence statements, custody records, witness materials, and procedural correspondence arranged in strict chronological order. The purpose of this index is to provide clarity, transparency, and efficient navigation of the evidence across both linked cases.

The total number of pages is recorded within the index.

Stamp Receipt Holder

- **A STAMPED RECEIPT OF SERVICE IS RESPECTFULLY REQUESTED.**

Summery Timeline Of Events Pre Trial Events
0. Timeline Of Events -Summery of Emails and Correspondence.docx
0. Timeline Of Events -Summery of Emails and Correspondence.pdf

Introduced as disclosed Is The Main Weblink To Our Defence File Cabinet:
https://everyonelogginto.me/01.%2002-08-2025-Another-Case/ = [To Parent Directory]

This is a weblink of all Emails and Correspondence placed into one chronological order!
<Dir> 00.1. All-Emails-Together_1: Not Used here but is contained in the folder, so it is demonstrated! = [To Parent Directory]

0. **<Dir>** 03. BUILT FOR COURT

Exhibit No.	Date	File / Folder	Description	Page No.
B1	**1+ Date:** 03/12/2025 **2+ Date:** 03/12/2025	1+ Notice To Defendant Proof By Written Statement 01ye1267925.docx 2+ Notice To Defendant Proof By Written Statement 01ye1267925.pdf	**— Notice to Defendant: Proof by Written Statement (Section 9) —** **File:** Notice To Defendant Proof By Written Statement 01YE1267925.pdf **Description:** Formal objection served on **03/12/2025** under **Section 9 Criminal Justice Act 1967**, requiring the attendance of all key witnesses listed in the CPS Section 9 Notice. The defendant objects to the prosecution's attempt to rely on written statements and sets out detailed reasons why live evidence is necessary. The notice identifies extensive contradictions, timestamp conflicts, backdated MG11 statements, custody-log irregularities, missing BWV, officer-identity inconsistencies, and procedural defects across arresting officers, disclosure officers, custody sergeants, DDO staff, the HCP, and the CPS reviewing lawyer. This document forms a critical part of the evidential challenge, demonstrating why written statements cannot safely be admitted and why cross-examination is essential to resolve disputed facts.	**1+ Pages**: 9 **2+ Pages**: 9
B2	**1+ 1 Date:** 03/12/2025 **1+ 2 Date:** 18/11/2025 **1+ 3 Date:** 18/11/2025	1+ **<DIR> 02. SIMONS DEFENCE STATEMENTS** [To Parent Directory] 1 One -Events On The Date and Leading Up To The Date!.docx • One -Events On The Date and Leading Up To The Date!.pdf	**1+ 1** **File:** *01. One – Events On The Date and Leading Up To The Date!.pdf* **Pages:** 8 **Description:** Detailed defence statement describing the events leading up to, during, and immediately after the incident of 02/08/2025. The document outlines the defendant's medical condition following recent hernia surgery, the physical limitations affecting mobility, and the factual sequence of interactions with the delivery driver and neighbour. It sets out the defendant's account of police attendance, forced entry, arrest, injuries, hospitalisation, and the subsequent custody process. The statement highlights procedural irregularities, contradictions in police conduct, and the factual basis supporting the defendant's innocence. This forms a core narrative exhibit within the defence bundle.	**1+ 1 Pages**: 0 **1+ 2 Pages**: 3 **1+ 3 Pages**: 22, 22, 21 **1+ 4 Pages**: 21 **1+ 5 Pages**: 10

Exhibit No.	Date	File / Folder	Description	Page No.
	1+ 4 **Date:** 26/11/2025 **1+ 5** **Date:** 09/10/2026 **Original:** 03/12/2025 **1+ 6** **Date:** 03/12/2025 **1+ 7** **Date:** 03/12/2025 **1+ 8** **Date:** 14/08/2025 **1+ 9** **Date:** 04/12/2025 **1+ 10**	2 Two -Decline of Community and Tenancy Integrity in a Council Estate.docx • Two -Decline of Community and Tenancy Integrity in a Council Estate.pdf 3 Three -Unlawful Actions Taken Against Me By Rebbeca O Hare and Co.pdf • Three -Unlawful Actions Taken Against Me By Rebbeca O' Hare and Co.docx • Three -Unlawful Actions Taken Against Me By Rebbeca O' Hare and Co.pdf	**1+ 2** **File:** *02. Two – Decline of Community and Tenancy Integrity in a Council Estate.pdf / .docx* **Pages:** 2 **Description:** Second defence statement dated 18/11/2025, addressing the long-term decline of community safety, tenancy integrity, and unlawful subletting within the Burncroft Avenue estate. The statement outlines the defendant's history as a long-term resident, the deterioration of the neighbourhood, and the emergence of harassment, hostility, and criminal behaviour from neighbouring flats. It details evidence that Flat 115 is being illegally occupied by Rebecca O'Hare without a secure tenancy, supported by video footage, council-contractor installation records, and housing-authority documentation. The statement provides contextual background relevant to motive, credibility, and the pattern of targeted harassment leading up to the alleged incident. **1+ 3** **File:** *03. Three – Unlawful Actions Taken Against Me By Rebbeca O'Hare and Co.pdf / .docx* **Pages:** 21 **Description:** Third defence statement dated 18/11/2025 detailing the long-term unlawful actions, harassment, coordinated setups, and procedural manipulation carried out by Rebecca O'Hare of Flat 115 and multiple neighbouring occupants across Burncroft Avenue. The statement provides a comprehensive evidential history from 2006–2025, supported by diaries, council forms, emails, housing records, and video exhibits. It documents illegal subletting, false allegations, coordinated harassment, council-enabled misconduct, and police procedural failures. The statement also maps the physical layout of the estate, identifies each occupant's role in the harassment pattern, and evidences how multiple flats (113, 115, 117, 111, 97) were	**1+ 6** **Pages**: 3 **1+ 7** **Pages**: 8 **1+ 8** **Pages**: 7 **1+ 9** **Pages**: 6 **1+ 10** **Pages**: 9 **1+ 11** **Pages**: 8 **1+ 12** **Pages**: mp4 1 **1+ 13** **Pages**: 4 **1+ 14** **Pages**: 21 **1+ 15** **Pages**: 8 **1+ 16** **Pages**: 3

Exhibit No.	Date	File / Folder	Description	Page No.
	Date: 18/12/2025 **1+ 11 Date:** 18/12/2025 **1+ 12 Dated**: 21/01/2026 **1+ 13 Date:** 21/01/2026 **1+ 14 Date:** 21/01/2026 **1+ 15 Date:** 21/01/2026 **1+ 16 Date:** 21/01/2026	4 Four -Rebecca O Hare Three Different Statements.docx • Four -Rebecca O Hare Three Different Statements.pdf 5 Five -Officers Arrest Timeline and Evident Procedural Inaccuracies.docx • Five -Officers Arrest Timeline and Evident Procedural Inaccuracies.pdf	used over time to target, provoke, and destabilise the defendant. This document forms a major contextual exhibit demonstrating motive, credibility issues, and the wider pattern of abuse relevant to the defence case. **1+ 4** **File:** *04. Four – Rebecca O'Hare Three Different Statements.pdf / .docx* **Pages:** 36 **Description:** Fourth defence statement dated 26/11/2025 analysing the three MG11 witness statements made by Rebecca O'Hare. The document identifies extensive contradictions, backdating, unsigned statements, altered timelines, and fabricated allegations spanning January–December–February. It demonstrates how her accounts conflict with physical layout, CCTV/BWV evidence, delivery-driver timings, witness testimony, and the defendant's documented movements. The statement also evidences procedural failures by police and CPS, including acceptance of unsigned MG11s, insertion of a third statement into a sealed case-ratio file without disclosure warning, and reliance on allegations already marked "No Further Action." This exhibit forms a major forensic challenge to the credibility, admissibility, and reliability of the complainant's evidence. **1+ 5** **File:** *05. Five – Officers Arrest Timeline and Evident Procedural Inaccuracies.pdf / .docx* **Pages:** 10 **Description:** Fifth defence statement analysing the arrest timeline and highlighting major procedural defects in police documentation. The statement identifies contradictions across multiple MG11 officer statements, including misidentification of the defendant, impossible dates and times, backdated statements, conflicting badge numbers, and inconsistent call-sign allocations. It challenges the lawfulness of the arrest, the validity of the caution delivered through a	

Exhibit No.	Date	File / Folder	Description	Page No.
			closed door, the absence of proper BWV disclosure, and the mismatch between the original arrest for harassment and the later substituted charge of Threats to Cause Criminal Damage. The document forms a key evidential exhibit demonstrating breaches of PACE Codes C and D, disclosure failures, and structural inconsistencies in the police account.	
		6 Six -Absence of Intent and Recklessness as well as Procedural Breach.docx • Six -Absence of Intent and Recklessness as well as Procedural Breach.pdf	**1+ 6** **File:** *06. Six – Absence of Intent and Recklessness as well as Procedural Breach.pdf / .docx* **Pages:** 3 **Description:** Sixth defence statement addressing the absence of intent, lack of recklessness, and procedural breaches relating to the substituted charge of *Threats to Cause Criminal Damage (Criminal Damage Act 1971, s.2)*. The statement explains that the defendant was never lawfully arrested, cautioned, or interviewed for this offence, and that no physical, digital, or circumstantial evidence exists to support intent or preparation. It highlights that the allegation relies solely on an uncorroborated witness statement, with no BWV, CCTV, or independent testimony. The document sets out the legal requirements for proving intent and demonstrates that none are met, making the charge factually unsupported and legally unsustainable. It also challenges the retrospective substitution of charges as a breach of PACE and established case law.	
		7 Seven -Key-Screenshot–Just-Eat-Timining-and-115-Rebbeca -Statement!.docx • Seven -Key-Screenshot–Just-Eat-Timining-and-115-Rebbeca -Statement!.pdf	**1+ 7** **File:** *07. Seven – Key-Screenshot – Just-Eat-Timing – and – 115-Rebbeca-Statement!.pdf / .docx* **Pages:** 8 **Description:** Seventh defence statement analysing the Just Eat delivery timestamps, call-log evidence, and the defendant's documented movements on 02/08/2025. The statement reconstructs a precise, minute-by-minute timeline using order confirmations, delivery windows, phone	

Exhibit No.	Date	File / Folder	Description	Page No.
			records, and witness presence to demonstrate that the defendant was outside only during the food collection and then inside awaiting the missing items. This timeline directly contradicts all three MG11 statements made by Rebecca O'Hare, showing that her alleged sighting and claimed threat could not have occurred. The document highlights multiple impossibilities in her account, including the 7-minute and 12-minute "corridor gaps," the absence of any mention of the delivery driver or food bag, and the mismatch between her claimed times and the CAD-based police arrival window. This exhibit forms a key alibi-based rebuttal demonstrating that the allegation is chronologically impossible.	
		8 Eight -Statement of Events – 14th August 2025.doc • Eight -Statement of Events – 14th August 2025.pdf	**1+ 8** **File:** *08. Eight – Statement of Events – 14th August 2025.pdf* **Pages:** *7* **Description:** Eighth defence statement detailing the events of **14/08/2025**, when the defendant was wrongly arrested for an alleged breach of GPS-tag bail conditions. The statement sets out the full chronology from the original arrest on **02/08/2025**, the court hearings on **04/08/2025** and **08/08/2025**, and the subsequent approval of a new bail address. It evidences that the arresting officers executed an outdated warrant, ignored court-approved bail-address changes, refused to review documentation, and attempted unlawful entry. The statement describes procedural failures by police, custody staff, the tagging company, and CPS, including misuse of custody hours, denial of legal representation, refusal to contact the appropriate adult, and reliance on fabricated or outdated records. It also documents the wider impact of long-term fabricated judicial entries, unlawful curfews, and systemic harassment, culminating in a video-link hearing where the defendant was released without the issues being addressed. This exhibit forms a key part of the defence case, evidencing unlawful arrest, procedural	

Exhibit No.	Date	File / Folder	Description	Page No.
			breaches, and systemic failures across police and court processes.	
		9 Nine -Case Ratio Extract Created Date.docx • Nine -Case Ratio Extract Created Date.pdf	**1+ 9** **Description:** + **File:** *09. Nine – Case Ratio Extract Created Date.pdf / .docx* **Pages:** 8 **Description:** Ninth defence statement analysing the CPS Case Ratio disclosure system and exposing late creation, retrospective reconstruction, and backdating of prosecution evidence. The statement demonstrates that the official Case Ratio folder for **URN 01YE1267925** was not created at charge (**03/08/2025**) as required by **CPIA 1996 and Crim PR** but instead was **Generated On 10/10/2025 By CPS User 2258**. It shows that the first disclosure served on **01/09/2025** did **not** contain Rebecca O'Hare's alleged "**Third Statement,"** proving it did not exist contemporaneously. The second disclosure (**10/10/2025**) suddenly included this statement, inserted into a newly built Case Ratio bundle and backdated to **07/08/2025**. Metadata, file IDs, and document timestamps confirm that PDFs and video files were uploaded weeks or months after the incident, undermining chain of custody and evidential integrity. The statement identifies inconsistent dates, undated witness entries, contradictory signature timelines, and disclosure-officer sign-offs made before all evidence existed. This exhibit forms a critical challenge to the reliability, authenticity, and lawfulness of the prosecution's disclosure, supporting exclusion **Under PACE S.78** and demonstrating systemic **Breaches Of CPIA, AG's Guidelines, And Article 6 ECHR**.	
		10 The Second Trial Date.docx • The Second Trial Date.pdf	**1+ 10** **Description:** + **File:** *10. The Second Trial Date.pdf / .docx* **Pages:** 8 **Description:** Tenth defence statement detailing the events surrounding the second trial listing on **13/12/2025** and the	

Exhibit No.	Date	File / Folder	Description	Page No.
		11 Illegal Bail Restrictions Tag GPS.docx • Illegal Bail Restrictions Tag GPS.pdf	procedural failures leading up to it. The statement documents extensive correspondence sent to CPS, the magistrates' court, and legal representatives, showing repeated non-acknowledgment of disclosure, ignored emails, and failures to act on defence requests. It describes the defendant's attempts to resolve legal aid issues, the discovery of manipulated Case Ratio files (including missing versions and unlawfully inserted documents), and the CPS's late-served "**V5**" bundle that had never been lawfully provided to the defence. The statement also recounts the court hearing where the defendant was placed in the dock despite being a litigant in person, denied the right to speak, and prevented from presenting evidence of fraudulent Representation Orders, URN misuse, and the unlawful charge swap. It highlights suppression of defence materials, refusal to review Case 1, and breaches of equality of arms. This exhibit forms a key record of procedural unfairness, disclosure manipulation, and judicial irregularities affecting the integrity of the proceedings. **1+ 11** **File:** *11. Illegal Bail Restrictions Tag GPS.pdf / .docx* **Pages:** 8 **Description:** Eleventh defence statement addressing the unlawful and disproportionate bail conditions imposed on **02/08/2025,** including **GPS Electronic Monitoring And Exclusion From The Defendant's Own Home**. The statement explains that the allegation **Concerns A Movable Object (A Car), Not A Person, Making GPS Tagging And Residence-Ban Conditions Legally Unjustifiable Under The Bail Act 1976, Sentencing Council Guidelines, And Proportionality Principles**. It details how the restrictions—**Lasting 207 Days**—far exceeded any realistic sentence for the alleged offence, violating necessity, proportionality, and	

Exhibit No.	Date	File / Folder	Description	Page No.
		12 The Horror of the Pit of Despair Isolation Experiment 1970 - Copy.mp4 12 URN Swapped1 - Urn Swapping In Criminal Cases and Police Custody Log Analysis.docx	least-restrictive-measure requirements. **The Statement Also Outlines Breaches Of Article 8 ECHR (Right To Private And Family Life), The Impact On Daily Living, And The Misuse Of Electronic Monitoring For A Non-Person-Based Allegation**. This exhibit forms a key argument demonstrating that the bail conditions were excessive, procedurally flawed, and amount to a miscarriage of justice. **1+ 12** **Description:** + **File:** *12. URN Swapped1 – URN Swapping in Criminal Cases and Police Custody Log Analysis.pdf / .docx* **Pages:** 4 (Chapter 1 of 5) **Description:** Twelfth defence statement, Chapter 1 of 5, setting out the legal and procedural implications of the unlawful reuse of **URN 01YE1267925**. The statement explains, using Legal Aid Agency guidance and custody-log evidence, **That A URN Cannot Be Used Twice, Cannot Support Two Different Cases, And Cannot Lawfully Generate Multiple Representation Orders**. It details how the original URN belonged to a **Section 4A Harassment Case That Was Marked NFA Yet Was Later Reused For A Substituted Charge Of Threats To Cause Criminal Damage Without A Lawful Rearrest, Interview, Or New Charge Sheet**. The chapter outlines contradictions between custody logs, solicitor attendance, disclosure files, and the LAA's confirmation that **No Representation Orders Existed In 2025**. It identifies a pattern of procedural irregularities involving "**Tuckers Solicitors, CPS, And The Court, Including Fabricated RO1/RO2 Documents, Failure To Close The NFA Case, And Instructions To Apply For Legal Aid Using The Wrong URN**." This chapter forms the foundation for the remaining four chapters, demonstrating systemic URN misuse, disclosure manipulation, and unlawful charge substitution.	

Exhibit No.	Date	File / Folder	Description	Page No.
		• URN Swapped1 - Urn Swapping In Criminal Cases and Police Custody Log Analysis.pdf 12 12. URN Swapped2 and 3- 1st and 2nd Files Disclosed To Me.pdf	**1+ 12.1** **File:** *12. URN Swapped1 – URN Swapping in Criminal Cases and Police Custody Log Analysis (Chapter 1 of 5)* **Pages:** 4 **Description:** Chapter 1 of the twelfth defence statement, setting out the legal impossibility of reusing **URN 01YE1267925 For A Different Allegation After The Original Case Was Marked NFA**. The statement explains, using Legal Aid Agency rules and GOV.UK guidance, that a URN can only correspond to one criminal case and cannot support multiple Representation Orders or multiple allegations. It details how the police reused an **NFA'd URN** to create a substituted charge without a lawful rearrest, interview, or new legal aid application, and how Tuckers Solicitors' actions—including failure to close the **NFA case**, denial of the **Custody-Log Arrest Reason**, and provision of two non-existent Representation Orders—created a procedural conflict that prevented lawful legal aid. **The chapter** also outlines the court's failure to **Address The URN** mismatch and the systemic pattern shown across custody logs, disclosure files, and LAA confirmations. This chapter forms the foundation for the remaining four chapters on disclosure **Manipulation, Of The Wood Green Police Station Custody-Log** contradictions, and institutional entrapment. **1+ 12.2&3** **File:** *12. URN Swapped2 and 3 – 1st and 2nd Files Disclosed To Me.pdf / .docx* **Pages:** 21 **Description:** Chapters 2 and 3 of the twelfth defence statement analysing the first CPS disclosure served on **01/09/2025** and the second disclosure served on **10/10/2025**. These chapters demonstrate that the initial disclosure contained only a minimal set of files, including a single officer statement and no complainant evidence, and that **The MG5 Case Summary Was Absent From Both Early Hearings**. The later disclosure introduced new	

Exhibit No.	Date	File / Folder	Description	Page No.
		12 12. URN Swapped4 - Police Custody Log Analysis CPS - NFA And Unlawful Charge Swap.pdf	**Documents—Including A Reconstructed MG5 And Additional Statements**—not present in the original bundle, **Evidencing Retrospective Alteration And Backdating**. The chapters detail contradictions between police MG11 statements, custody-log entries, and the substituted charge, showing that the only contemporaneous allegation was Harassment Act 1997. They also highlight the unlawful reuse of an NFA'd URN, the absence of any lawful charge-creation process, and the introduction of substituted offences without evidential basis. These chapters form a core evidential analysis demonstrating disclosure manipulation, procedural defects, and the unlawful construction of the prosecution case. **1+ 12.4** **File:** *12. URN Swapped4 – Police Custody Log Analysis, CPS – NFA and Unlawful Charge Swap.pdf / .docx* **Pages:** 21 **Description:** Chapter 4 of the twelfth defence statement providing a detailed forensic analysis of the Wood Green Police Station custody logs, demonstrating that the defendant was lawfully detained only for a **Section 4A Public Order Act Allegation,** which the CPS reviewed and discontinued (**NFA**) on **03/08/2025**. The chapter shows that no lawful process—no further arrest, no caution, no new grounds, no MG4 charge sheet, no CPS authorisation—was ever recorded for any additional offence. Despite this, a new allegation ("**Threat to Damage/Destroy Property**") appears for the first time at 03:09 on **04/08/2025**, handled by officers who were not involved in the arrest, booking-in, or CPS review. The custody logs contain backend administrative override entries ("**Custody Delete Offence,**" "**Custody Create Disposal,**" "**Custody Amend Arrest Request**"), proving that the original offence was deleted and replaced after custody, not during lawful detention. This chapter establishes that the URN was reused after the NFA decision, the	

Exhibit No.	Date	File / Folder	Description	Page No.
		12 12. URN Swapped5 - Institutional Isolation and Procedural Entrapment.pdf 13 Illegal Bail Restrictions Tag GPS V2.pdf	charge was substituted unlawfully, and the MG4 was created outside the custody process. It forms a central evidential pillar demonstrating procedural manipulation, breach of PACE, breach of CPS charging guidance, and the unlawful construction of the substituted charge. **1+ 12.5** **File:** *12. URN Swapped5 – Institutional Isolation and Procedural Entrapment.pdf / .docx* **Pages:** 8 **Description:** Fifth and final chapter of the twelfth defence statement examining the wider institutional pattern surrounding the unlawful URN reuse, charge substitution, and procedural contradictions identified across the custody logs, ACRO/PNC records, and CPS disclosures. This chapter uses the "**Pit Of Despair**" isolation-experiment analogy to illustrate how repeated restrictive processes, incorrect records, and unresolved procedural errors have created long-term institutional isolation for the defendant. It demonstrates how fabricated or inaccurate entries, repeated NFA outcomes, disproportionate bail restrictions, and the recycling of incorrect intelligence markers have collectively produced a systemic pattern of entrapment rather than lawful case progression. The chapter argues that the unlawful offence swap and reuse of the discontinued URN **01YE1267925** are not isolated mistakes but part of a sustained structural failure that has repeatedly removed autonomy, restricted liberty, and undermined fair-trial rights. It concludes that these actions amount to breaches of due process, data-accuracy obligations, and the defendant's rights under the Human Rights Act 1998. **1+ 13** **Description:** + As Above!	
B3	**1+** **Date:** 03/12/2025	1+ 03. Defendant's Application For Prosecution Disclosure-	**1+** **Files:**	**1+** **Pages**: 12

Exhibit No.	Date	File / Folder	Description	Page No.
	2+ Date: 03/12/2025	Eng.docx 2+ 03. Defendant's Application For Prosecution Disclosure-Eng.pdf	• *03. Defendant's Application For Prosecution Disclosure-Eng.docx* • *03. Defendant's Application For Prosecution Disclosure-Eng.pdf* **Pages:** 12 (docx) / 11 (pdf) **Description:** Formal application under CPIA 1996 s.8 and Crim PR 22.5 requesting full prosecution disclosure for **Case 1 (URN: 01YE1267925)** and related **Case 2 (URN: 01YE1300125)**. The document sets out a comprehensive list of undisclosed materials required for a fair trial, including complete custody logs, custody-suite CCTV, full interview recordings, all body-worn footage, MG11 statements, police notebooks, 999 audio, CPS internal communications, Legal Aid documentation, Case Ratio metadata, and all unused material. The application explains why each item is relevant, why the prosecution must hold it, and how the material may undermine the substituted charge or assist the defence. It highlights procedural defects including the unlawful charge swap, absence of lawful caution for the substituted offence, removal of the appropriate adult, incomplete interview disclosure, missing forensic assessments, and inconsistencies in officer statements. The application also requests a court hearing to address disclosure failures, compel production of withheld evidence, and examine procedural breaches affecting representation, bail conditions, and the integrity of the prosecution case.	**2+ Pages**: 11
B4	**1+ Date:** **2+ Date:**	1+ 04. Application to Exclude Evidence Under Section 78.docx 2+ 04. Application to Exclude Evidence Under Section 78.pdf	**To Be Viewed By Defence Solicitor** **1+ Files:** • *04. Application to Exclude Evidence Under Section 78.docx* • *04. Application to Exclude Evidence Under Section 78.pdf* **Pages:** 2 (docx) / 2 (pdf) **Description:** Formal application seeking the exclusion of prosecution evidence under Section 78 of the Police and Criminal Evidence Act 1984 on the grounds that its admission would have such an adverse effect on the fairness of the proceedings	**1+ Pages**: 2 **2+ Pages**: 2

Exhibit No.	Date	File / Folder	Description	Page No.
			that it ought not to be admitted. The document identifies multiple evidential defects across both **Case 1 (URN: 01YE1267925)** and **Case 2 (URN: 01YE1300125)**, including an unsigned and therefore inadmissible MG11 statement from the alleged victim, officer statements relying on a substituted charge that was never lawfully processed, and custody-log inaccuracies concerning solicitor access and appropriate-adult attendance. It further challenges incomplete interview footage, missing body-worn video, and procedural irregularities that undermine reliability and chain of custody. The application requests that the court exclude the unsigned MG11, the procedurally defective police statements, and the incomplete interview recording, and that the matter be listed for a pre-trial hearing to determine admissibility.	
B5	**1+ Date:** **2+ Date:**	1+ 05. Dir List2New.docx 2+ 05. Dir List2New.pdf	**To Be Viewed By Defence Solicitor** **1+ Files:** • *05. Dir List2New.docx* • *05. Dir List2New.pdf* **Pages:** 5 (docx) / 5 (pdf) **Description:** Updated defence directory list providing a structured index of all exhibits, statements, correspondence, custody-log extracts, disclosure files, and evidential documents relied upon in the defence case. This directory consolidates materials from both Case 1 and Case 2, organising them into a clear, chronological, and cross-referenced format for use by the defence solicitor. It identifies each document by title, file type, and evidential purpose, ensuring that all materials relevant to unlawful URN reuse, charge substitution, disclosure failures, custody-record contradictions, and procedural breaches are easily accessible. This directory serves as the master navigation tool for the defence bundle, enabling efficient review, preparation, and presentation of the defence case.	**1+ Pages**: 5 **2+ Pages**: 5

Exhibit No.	Date	File / Folder	Description	Page No.
B6	**1+** **Date:** 12-09-25 **2+** **Date:** 12-09-25 **3+** **Date:** 12-09-25	1+ 06. Statement of Witness Section 9 Criminal Justice Act 1967 Saheed Olowu.docx 2+ 06. Statement of Witness Section 9 Criminal Justice Act 1967 Saheed Olowu.pdf 3+ **<Dir>** 06. Saheed-Statement-12-09-25 [To Parent Directory] 1 of 3.jpg 2 of 3.jpg 3 of 3.jpg 4 06. Statement of Witness Section 9 Criminal Justice Act 1967 Saheed Olowu.docx 5 06. Statement of Witness Section 9 Criminal Justice Act 1967 Saheed Olowu.pdf	**1+** **B6 — 12/09/2025 — Section 9 Witness Statement of Saheed Olowu** **File:** *06. Statement of Witness Section 9 Criminal Justice Act 1967 Saheed Olowu.docx* **Pages:** 3 **Description:** ***Formal Section 9 Criminal Justice Act 1967*** witness statement from Saheed Olowu, setting out his account of events relevant to the incident of **02/08/2025**. The statement is presented in statutory format and intended for evidential use without requiring the witness to attend court unless challenged. This document forms part of the prosecution's early disclosure and is relied upon to support the narrative surrounding police attendance and the alleged incident. It is included in the defence bundle for accuracy review, cross-reference with custody-log entries, and assessment of consistency with other officer statements. **2+** **B6 — 12/09/2025 — Section 9 Witness Statement of Saheed Olowu (PDF Version)** **File:** *06. Statement of Witness Section 9 Criminal Justice Act 1967 Saheed Olowu.pdf* **Pages:** 3 **Description:** PDF version of the Section 9 witness statement authored by Saheed Olowu, identical in content to the .docx version. This version is formatted for court presentation and evidential submission. It is included for comparison, pagination, and verification against the original disclosure files served by the CPS. **3+** **B6 — 12/09/2025 — Saheed Olowu Statement Folder** **Folder:** *06. Saheed-Statement-12-09-25* **Files:** 5 (3 JPG images + DOCX + PDF) **Description:** Folder containing all materials associated with the Section 9 witness statement of Saheed Olowu, including three	**1+** **Pages**: 3 **2+** **Pages**: 3 **3+** **Files**: 5

Exhibit No.	Date	File / Folder	Description	Page No.
			JPG image scans of the original statement pages and both the DOCX and PDF formatted versions. The image files provide the raw scanned copies for authenticity checks, signature verification, and comparison against the typed versions. This folder preserves the complete evidential chain for the statement and is used to confirm accuracy, detect alterations, and ensure consistency across all disclosed formats.	
B7	**1+** **Date:** 18-11-25 **2+** **Date:** 18-11-25 **3+** **Date:** 18-11-25	1+ 07. Aunt Statement WITNESS MG11.docx 2+ 07. Aunt Statement WITNESS MG11.pdf 3+ **<Dir>** 07. Aunt Statement-18-11-25 [To Parent Directory] 1 07. Aunt Statement WITNESS MG11.docx 2 07. Aunt Statement WITNESS MG11.pdf Aunt Statement.jpg	**1+** **File:** *07. Aunt Statement WITNESS MG11.docx* **Pages:** 1 **Description:** Formal MG11 witness statement provided by the defendant's aunt, offering an independent account relevant to the events surrounding the allegation of **02/08/2025**. The statement supports the defence position by confirming the defendant's behaviour, circumstances, and context at the time of the incident. It is included as part of the defence evidence to counterbalance police assertions and to demonstrate the defendant's character, routine, and the absence of any threatening or unlawful conduct. **2+** **File:** *07. Aunt Statement WITNESS MG11.pdf* **Pages:** 1 **Description:** PDF version of the MG11 witness statement authored by the defendant's aunt. Identical in content to the DOCX file, this version is formatted for court submission and evidential use. It provides a clean, fixed-layout copy suitable for inclusion in the defence bundle and for presentation during hearings. **3+** **Folder:** *07. Aunt Statement-18-11-25* **Files:** 2 (DOCX + PDF) + 1 image (Aunt Statement.jpg) **Description:** Folder containing all materials associated with the aunt's MG11 witness	**1+** **Pages**: 1 **2+** **Pages**: 1 **3+** **Files**: 2

Exhibit No.	Date	File / Folder	Description	Page No.
			statement, including the DOCX and PDF versions and a JPG image of the original signed statement. The image file preserves the raw scanned copy for authenticity verification, signature confirmation, and comparison against the typed versions. This folder maintains the evidential chain and ensures the statement can be validated against its original source.	

C3	**1+ Date:** Numerous Dates! **2+ Date:** 27-08-23 **3+ Date:** Numerous Dates!	New Weblink to Files for PNC Return "**Defence statement!"** 1+ 05. Defence Statement 26-08-25- PNC Record Return.pdf 2+ Cordell Simon Paul 01YE1300125 Initial Details Pros Case.docx.docx 1+ **<Dir>** 10. 1Test	**C3(1+) File: Description:** **C3(2+) File: Description:** **C3(3+) File: Description:**	**1+ Pages**: 6 **2+ Pages**: 28 **3+ Pages**: