

Certificate of Amendment

I, **Simon Paul Cordell**, submit this amended defence statement to correct and clarify information that was not available or not fully understood at the time of the original disclosure. Further review of the custody records and officer-action logs has identified additional officers, corrected roles, and clarified the sequence of events relevant to the charge recorded under URN 01YE1267925.

This amendment is necessary to ensure accuracy, completeness, and fairness in the presentation of my defence

(Signed)



(On behalf of Mr. Simon Paul CORDELL)

(Dated) 21/01/2026

TUCKERS SOLICITORS LLP
Solicitors
39 Warren Street
London
LONDON
5th August 2025



01YE1267925/RAJ

NOTICE TO DEFENDANT: PROOF BY WRITTEN STATEMENT
(Criminal Procedure Rules, r. 27.4(s); Criminal Justice Act, 1967, s9)

Defendant Simon CORDELL

Court and Hearing Date: Highbury Corner Magistrates Court 13th October 2025 with this notice are copy statement(s) made by the witness(es) listed below.

The prosecutor wants to introduce this evidence in writing, instead of the witness(es) giving the evidence in person.

How to reply to this notice:

If you do NOT want the prosecutor to introduce the evidence of these witnesses in writing, you must:

1. List the witness(es) you want to give evidence in person.
2. Send me the list not more than 7 days after this notice is served on you (as required by section 9(2)(d) of the Criminal Justice Act 1967).
3. Be prepared to explain to the court what issue(s) in the case make(s) it necessary for the witness(es) to give evidence in person (as required by Criminal Procedure Rules 3.2, 3.5 and 3.10).

(Signed)
(On behalf of the Prosecutor)

Notes:

1. If you are late letting the prosecutor know which witnesses you want to give evidence in person, then the prosecutor can introduce the evidence in writing, unless the court otherwise directs.
2. If, at your request, a witness attends court to give evidence in person when that is not necessary to deal with the issues in the case, the court may make a costs order against you.
3. Despite service of this notice:

London North-East
Magistrates Court Unit 1
02 Petty France

London
SW1H9EA

DX: 161330 Westminster 11

Tel: 0203 357 7000

London.magistrates@cps.gov.uk

- (a) the prosecutor may arrange for any of the listed witness(es) to give evidence in person: or
- (b) the prosecutor may decide not to rely on one or more of the listed witnesses after all.
- (c) **Ref:** 01YE1267925/RAJ

(Signed)



(On behalf of Mr. Simon Paul CORDELL)

(Dated) 03/12/2025

No	Statement(s)	Date Statement(s)	Page number(s)
1	George Samuel Wilson-Wallis	Undated	all

NOTICE OF OBJECTION TO SECTION 9 STATEMENTS

Case: R v Simon Cordell

URN: 01YE1267925

- I, Simon Cordell, object to the following witnesses' evidence being read under Section 9 CJA 1967.
- I require their attendance in person for cross-examination, as their live testimony is necessary to resolve disputed issues in the case.

Witnesses Required in Person: --

1. **Rebecca O'Hare –**

- a) Alleged victim. Her credibility and consistency of accounts are central to the defence.

2. **[Rebecca O'Hare's children's father] –**

- a) Listed as **"Children's Dad"**. His evidence relates directly to the alleged victim's background and context.

Disclosure / Evidence Officers

3. **PC Joel Avigdor (P265750 / 2916NA) – Disclosure Officer**

- a) Certified unused material schedule.
- b) Must explain contradictions in disclosure, including backdated MG11s, why unused material was marked **"Nothing To Disclose,"** and why key exhibits (999 call, custody contradictions) were omitted at a later date.
- c) Needs to clarify his roles in person in certifying disclosure about custody logs show irregularities and BWF not disclosed. Why only last two minutes of interview is submitted and case ratio files are selectively selected to hide the truth about Mr. Simon Cordell's Innocence and also to be integrated about the third Statement taken from alleged Victim, Rebecca O'Hare and its disclosed date and created date!

4. **PC Calvin Chan (1405NA / 2464NA) – Arresting officer**

- a) Statement dated 02/08/2025 at 1300 hrs., impossible as arrest occurred at 21:16.
- b) Admits he did not receive the allegation; only Obsiye spoke with the alleged victim.
- c) Exhibits BWV CKC/01, but disclosure says, "Exhibit does not work." Must attend to explain timestamp integrity and why footage is unavailable.
- d) Badge number ambiguity (**1405NA vs 2464NA**) must be clarified in person.
- e) Attendance required to resolve contradictions about entry, use of force, and officer identity. Why BWF Shows him outside the flats while pc Obsiye is still upstairs taking a statement alone and his statements don't mention this causing a conflict in his timeline of events.

5. **PC Obsiye (P243682) – Arresting officer**

- a) Refused to listen at the front door and act in accordance to policies. Police Caution for Harassment Act of Law alone though a closed front door without identification of the alleged offender.
- b) Logged threats not demonstrated by evidence,
- c) Applied leg restraints, recklessly.
- d) Custody record falsely claims she searched for me at **07:58 on 03/08/2025,** though I was brought to hospital by over officers and never saw her again, after the **02/08/25.**
- e) Must explain this contradiction and confirm her actual involvement as the cases she brought was NO Further Actioned but still contains the same Can and Urn number **with an Illegal Swapped Charge due to no legal process afterwards, as the police official custody logs prove!**
- f) Pc Obsiye official MG11 Statement is also contended as it is illegally backdated to the **01-08-2025** and its created date is before the day of incident meaning she never created the official statement when she gave her oath stating otherwise, **"Date/Time Impossible; Backdated Statement,"**

- g) Her BWV has not been disclosed as required by the defence as a reviewable copy.
- h) She is also the statement taker of Rebeca O' Hare and was left alone while Pc Chan was outside as his BWF Demonstrates to be true.

6. **PC Reece Williams (1675NA) – Van officer**

- a) Statement dated **30/08/2022**, three years before incident. Suggests template reuse or misfiling.
- b) Confirms Obsiye delivered caution through closed door, FOR harassment Act 1997, alone violating PACE Code C (lawful access, visual identification, comprehension).
- c) Describes Chan as 2464NA enforcer, contradicting Obsiye's confirmation of 1405NA. Must attend to clarify officer identities and accountability.

7. **PC George Wilson-Wallis (1456NA) – Van officer**

- a) States arrest occurred at 21:16 **"Through the Closed Front Door."** Confirms Obsiye performed the arrest for Harassment alone.
- b) Refers to suspect as **"Samual,"** not Simon. Critical identity error undermines reliability.
- c) Attributes enforcer to **2464NA**, not **Chan**. Must attend to explain officer identities and clarify who breached the door.
- d) Call sign confusion (**NA30L vs NA22N**) must be explained as this is another team member of his or a made-up badge number.

8. **PC Uddin (P264294) – Interviewing officer**

- a) Conducted interview.
- b) Must explain why disclosed video shows only a fragment (16:13–16:14) and **why the Threats to Cause Criminal Damage Act 1971 charge/complete interview is missing.**
- c) Needs to clarify whether interview notes were altered or incomplete.

Custody Sergeants ("Skippers")

1. **SGT OZCAN (P240417) – CUSTODY SERGEANT — FULL SHIFT TIMELINE TABLE**

- a) **Re** Authorised "Detention at 07:58" before any officer in case was assigned.
- b) Approved a search entry attributed to PC Obsiye that could not have occurred.

• **Reason Attendance Is Required:**

Sgt Ozcan Must Explain The Lawfulness Of The Initial Detention, The Basis For The Search Entry, And Why Detention Grounds Were Repeated Despite Contradictions In The Custody Record.

2. **SGT HALES (P235743) – CUSTODY SERGEANT — FULL SHIFT TIMELINE TABLE**

- a) Logged arrest "Details at 09:19," noting "Officer in case was NA VCT."
- b) No Officer in Case (OIC) was assigned during detention.

• **Reason Attendance Is Required:**

Sgt Hales must explain why no OIC was assigned, how charges were processed without oversight, and why the custody record shows gaps in officer assignment.

3. SGT BLOOMFIELD (P232415) – SHIFT TYPE FOR EACH TIMESTAMP

- a) 03/08/2025 – 16:17 Interview Finish
- b) Returned detainee to custody at 16:17
- c) Reset cell-visit clock
- d) PACE compliance signed by PC Uddin at 16:16

• **Reason Attendance Is Required:**

Sgt Bloomfield must clarify the interview return process, confirm PACE compliance, and explain discrepancies between interview timing, return timing, and custody-log entries.

4. 4. SGT SMITH (P201985) — FULL SHIFT TIMELINE TABLE

• **Early-Morning Disposal Decision – 04/08/2025 at 03:33**

- a) Sgt Smith is recorded as the supervising custody sergeant at **03:33**, the time the early-morning disposal/decision entry was made. This is a critical timestamp because it falls within the period where the detainee recalls seeing the “main corporate” officer again — despite this being a different shift from the 08:00 arrival the previous day.

• **Key Issues Requiring Clarification:**

a) **Basis for the Disposal Entry:**

The custody record shows a disposal decision at 03:33, but the underlying rationale, evidence reviewed, and procedural checks performed by Sgt Smith are not documented in detail.

b) **Continuity of Detention:**

Sgt Smith must clarify what information was handed over from the previous sergeant, whether any irregularities were flagged, and what he understood about the detainee’s status at the time.

c) **Medical and Welfare Notes:**

The custody record contains disputed mental-health-related entries and welfare observations. As the supervising sergeant at 03:33, Sgt Smith must explain whether he reviewed these entries, relied on them, or authorised decisions based on them.

d) **Identity and Presence:**

Because the detainee recalls seeing the same officer at both 08:00 and 04:00 — two different shifts — Sgt Smith’s attendance is necessary to confirm his presence, role, and actions during the night shift.

e) **Reason Attendance Is Required:**

Sgt Smith must explain the early-morning disposal decision, confirm the accuracy of the custody entries under his supervision, and clarify continuity of detention and welfare-related notes.

5. SGT WILLANS (P236764) – CUSTODY SERGEANT — SHIFT TIMELINE TABLE

- a) Took over custody at 18:57 handover.
- b) Must explain continuity of detention and whether irregularities were communicated during handover.
- c) Recorded: “I participated in a handover between the incoming and outgoing custody teams, which was conducted within the sight and sound of CCTV. I accept responsibility for the detainee.”

- **Reason Attendance Is Required:**

Sgt Willans must clarify the handover process, explain welfare-note inconsistencies, and confirm what information he received about the detainee's status.

Inspector

1. **Insp Sewell (P240595) – Inspector**

- a) Conducted detention review at 13:33.
- b) Must explain why continued detention was authorised despite disputed medical entries, absence of OIC, and contradictions in custody logs.

Custody Staff (DDOs)

1. **Novo Rodriguez (C749973) – DDO**

- a) Booked me in at 07:43, logged detainee details, property, rights.
- b) Must explain contradictions in search, and risk assessments.+++
- c) Needs to clarify why custody record shows fabricated entries under his supervision.

2. **Raza (C746655) – DDO**

- a) **Immigration checks, appropriate adult contact.**
- b) Must explain why appropriate adult was inconsistently logged as present/not present.
- c) Needs to clarify why Simons Aunt, **Appropriate Adult**, was denied access despite being available. She was telephoned and told that the initial charge was dropped by police and that new charge will be brought to him and she will need to attend, afterwards she never received another call asking her to attend so contact the police back herself to be told that another appropriate adult has attended. Simon at the time refused any other **Appropriate Adult other than his Aunt!** She was misled into believing I had refused her and that I went through another legal process due to new Criminal Charges being brought.

3. **Shirzad (C747009) – DDO**

- a) Cell visits, welfare checks.
- b) Must explain observations logged (talking to self, hallucinations) and whether they were fabricated.
- c) Needs to clarify contradictions in mental health notes.

4. **Eren (C744882) – DDO**

- a) Supervised movements, biometrics.
- b) Must explain custody transfers, biometric capture inconsistencies, and confirm whether data was altered.

5. **Bertrand (C746668) – DDO**

- a) Cell transfers.
- b) Must explain chain of custody, confirm continuity of detention, and clarify fabricated transfer notes.

6. **Sil (C728029) – DDO**

- a) Medical observations.
- b) Must explain notes about stomach pain, hospital discharge papers, and contradictions in welfare logs.

7. **Nelson-Cole (C748236) – DDO**

- a) Cell visits, meals.
- b) Must explain welfare checks, confirm accuracy of logs, and clarify fabricated entries.

8. **Hussain (C740421) – DDO**

- a) PNC updates.
- b) Must explain changes to my PNC record, insertion of aliases, and contradictions in custody record.

9. **Mehmood (C098409) – DDO**

- a) Cell visits noted MH observations.
- b) Must explain entries claiming I was hallucinating/talking to myself and clarify contradictions in mental health notes.

Healthcare Professional

1. **Lepadatu (C745201) – HCP**

- a) Conducted medical exam at 09:00–09:12.
- b) Is said to have Inserted psychosis note and recommended Appropriate Adult, despite no prior diagnosis or disclosure.
- c) Must explain basis for this entry, contradictions in medical notes.

CPS

22. **CPS Prosecutor Jrainbird – CPS**

- a) Signed disclosure certificate on 22/09/2025.
- b) Must explain why unused material was marked **“Nothing To Disclose”** despite clear relevance **(999 call, custody Detention Log Contradictions) and additional Backdated Statements as well as Created date and modified date of Case Ratio Archive.**
- c) Needs to clarify why disclosure was incomplete and backdated.

Issues Making Live Evidence Necessary

- Credibility and reliability of alleged victim's statements.
- Procedural irregularities in disclosure and custody records.
- Fabricated or contradictory custody entries (search, medical, interview).
- Accuracy of medical notes and risk assessments.
- Lawfulness of detention and interview process.
- Integrity of PNC updates and disclosure certification.
- Missing badge numbers and incomplete officer identification (e.g. PC Chan).
- Impossible timestamps, misidentifications, and unlawful caution procedures.

Key

- NA30L was assigned to CAD 6844/02082025
- NA22L called for a van to facilitate the transport

NFR/S9 (11.09)

LIST OF WITNESSES WHOSE STATEMENTS ARE WITH THIS NOTICE

Please indicate which of these witnesses you want to give evidence in person; and what issue(s) in the case make(s) that necessary. If you do not want any of these witnesses to give evidence in person, please tell the prosecutor

(Signed)



(On behalf of Mr. Simon Paul CORDELL)

(Dated) 03/12/2025