WITNESS STATEMENT

Criminal Procedure Rules, r27. 2; Criminal Justice Act 1967, s. 9;

Magistrates' Courts Act 1930, s.5B

Statement of: Mr. Simon Paul Cordell
Age if under 18: Over *(if over 18 inserts 'over 18') 'over 18'*

This statement (consisting of [17] page(s) all signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.

Dated: 18/10/2026



(Signed) Mr. Simon Paul CORDELL)

STATEMENT 3 OF 3: ANALYSIS OF PROSECUTION WITNESS STATEMENTS AND CASE RATIO DISCLOSURE IRREGULARITIES

1. PURPOSE OF THIS STATEMENT

This statement is the third in a series of three witness statements analysing the inconsistencies in the complainant's evidence.
Part 1 "Statement 1 of 3: analysed the complainant's First Statement, including her evasive address disclosure and the initial allegations.
Part 2 "Statement 2 of 3: analysed the complainant's Second Statement and the contradictions between her First and Second Statements, including the recycling of video evidence and charge substitution.
This Part 3 (Statement 3 of 3: analyses the complainant's Third Statement and the procedural irregularities in the CPS disclosure process, specifically the creation of the Case Ratio File Archive and the backdating of evidence.

I also have referred the Court to:
Witness Statement 1: Background and chronology of complaints
Witness Statement 2: The 17 September 2026 ASB meeting and Land Registry evidence
Witness Statement 4a (1 of 3): Analysis of complainant's First Statement
Witness Statement 4b (2 of 3): Analysis of complainant's Second Statement

Exhibit 09: "Case Ratio Extract Created Date," What is my metadata evidence supporting the observations in this statement!

2. THE COMPLAINANT'S THIRD STATEMENT: A FABRICATED DOCUMENT

I bring to the Court's attention serious concerns regarding the handling of my case, Case Ref: 02/08/2025. Evidence shows that Rebecca O'Hare's Third Statement was fabricated, added just days before trial, and backdated to appear as part of the original disclosure.

a) The prosecution introduced three statements from Rebecca O'Hare. The first two were disclosed on **01/09/2025**. The Third Statement suddenly appeared in a later disclosure on 10/10/2025 — yet it purports to be dated 07/08/2025, before the first disclosure.

b) This Third Statement contains "clarifications" that only make sense if the author had already read my defence:

- She changed the date of the door incident from January to February — only after I disclosed council contractor schedules.
- She removed the contractor reference — only after I raised questions about council ownership of Flat 115.

- She added a new 2021 allegation — only after her original claims were shown to be inadequate.

c) The CPS then created a "Case Ratio File Archive" on 10/10/2025 — two months after charge — and inserted this Third Statement into it, presenting the whole package as if it were contemporaneous. The metadata proves otherwise. I refer the Court to Exhibit 09 ("Case Ratio Extract Created Date") for the technical evidence.

d) This was not a "mix up**" or "error."** This was a deliberate fabrication to cover up the complainant's illegal occupation of Flat 115 and to secure a conviction against me after the original harassment charge failed.

3. TIMELINE OF EVENTS

Magistrates Court Case Ref: 02/08/2025
Case Started: 02-08-25
Hospital With Police: 03-08-25
Arrived At Police Station and Refused Bail to Court: 03-08-25
At Court: 04-08-25

4. THE CPS DISCLOSURE PROCESS

On **10/10/2025**, I received a bundle of files from Tucker Solicitors. The CPS provided these files knowing Tucker could not act on my behalf other than as a section 36/38 cross-examiner. I refuted this as an unfair service. The CPS files attempted to serve me a digital folder titled "The CPS-caseratio-10-10-25-Casefiles."

- **Its Contents Includes:**

Nub.	File Names	File Notes
01	**CORDELL Simon 01YE1267925 Initial Details Pros Case 22-09-2025.pdf**	**Original Prosecuting Teams File! This file now contains the Third Statement that is Backdated by Rebbecca O'Hare and the Prosecuting Teams & Co! The File was sealed and disclosed as the 22-09-2025 and I first received it on the 01/09/2025.**
02	CORDELL Simon 01YE1267925 Unused Material Disclosure 22-09-2025.docx	Docx version of Original
02	CORDELL Simon 01YE1267925 Unused Material Disclosure 22-09-2025.pdf	Original Prosecuting Teams File!
02	Return CORDELL Simon 01YE1267925 Unused Material Disclosure 22-09-2025.docx	Docx version of Original
02	Return CORDELL Simon 01YE1267925 Unused Material Disclosure 22-09-2025.pdf	Pdf version of Original
03	CKC 01 Witnessing arrest of Simon Cordell.mp4	Original Prosecuting Teams File!
04	Rebecca O'Hare's Video 11. ROH 01 MP4.docx	Docx version of Original
04	Rebecca O'Hare's Video 11. ROH 01 mp4.pdf	Pdf version of Original
04	Rebecca O'Hare's Video 11. ROH_01.mp4	Original Prosecuting Teams File!
04	Rebecca O'Hare's Video.docx	Docx version of Original

05	Axon Interview, Interview Room 7 Camera 1 mp4.mp4	Original Prosecuting Teams File!
06	CORDELL Simon 01YE1267925 Section 9 05-08-2025.pdf	Original Prosecuting Teams File!

5. A Copy of REBBECCA O'HARE'S THIRD STATEMENT Dated the 07/08/2025, For Ease of Comparison:

WITNESS STATEMENT

Criminal Procedure Rules, r27. 2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1930, s.5B

URN	01	YE	12679	25

Statement of: Rebecca O'HARE
Age if under 18: Over *(if over 18 inserts 'over 18')* Occupation: Police Constable

This statement (consisting of 2 page{s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.
Signature: Signed Electronically (See Last Page)
Date: 07/08/2025

I am the above-named person. This is my third statement in regard to an incident that was reported to police on the **2nd of August 2025** concerning my neighbour who has harassed me - SIMON.

This is a clarification statement.

The block of flats on BURNCROFT AVENUE is made up of 6 flats within the block and 2 flats per floor. SIMON lives on the floor below me but not directly underneath me.

In my original statement I stated that in **January** my neighbour SIMON was banging on my door shouting that I was making noise, **I'll punch you up**, **I'll slap you up** and your daughter.

He also said he would do the same thing to **my children's dad.**

This actually occurred on the **29th of DECEMBER**, and I believe this was an error by the officer taking the statement as I did say it happened in **DECEMBER**.

I remember because I came back from my mother's house where I had been over Christmas.

I woke up at **0615** as I am a type 1 diabetic and had low blood sugar.

I was lying down waiting to retest my sugar levels when I heard the communal door open and then banging on my front door and shouting.

I knew it was SIMON as I recognise his voice due to him having shouted at me so many times. **I Then Went to The Peephole and Saw It Was Him.**

In my original statement I stated that I took a video of this and **sent this to the police**, **but:**

I actually had a video of a different incident which occurred:

when I was getting a **New Door Fitted**. I believe this was a mix up by the police officer taking the statement at the time.

I mentioned that in **JANUARY** I was getting a new door fitted when SIMON came to my front door and started shouting that he would hit me, hit my eldest daughter and drag my unborn baby out my stomach.

He was stood outside the threshold of my front door in the communal hallway.

I was stood inside my flat the entire time.

This is the incident that I filmed and sent to police, and I have since seen that I actually filmed that video on the **3rd of FEBRUARY 2025** and not in **JANUARY**.

It is hard to hear what is said on the video, but **I believe** he said he would **hurt me** and **my unborn child** as he was **walking from my front door back into the communal corridor**.

I would like to clarify that the incident which occurred on **Saturday 2nd August 2025** occurred in the communal building **corridor on the staircase.**

This is where SIMON said, **"I WILL BLOW UP YOUR CAR" and "I WILL BLOW IT TO THE OTHER SIDE OF THE STREET."**

He also said, "WHEN YOU COME AND ASK *ME ABOUT IT, I'LL TELL YOU IT WASN'T ME"* and ***"I'LL COME AND LOOK FOR YOU AT YOUR NEW HOUSE."***

I would like to add an incident which happened between SIMON and me: In **2021** called 101 because of him too

I was about to walk down the stairs to take my daughter outside when SIMON came to the bottom of the stairs. I looked down. He looked up. He started going off saying "YOU'RE A HORRIBLE PERSON"

" YOU'RE A SHIT MUM" "WHEN YOUR DAUGHTER IS NOT THERE, I AM GOING TO COME LOOKING FOR YOU".

I waited for him to go and then left to my friend's house.

Signature: Signed Electronically (See Last Page)
Statement Taken By: PC AVIGDOR 2916NA

6. Table of Inconsistencies, Contradictions, and New Allegations in Complainant's Third Statement (07/08/2025)

Item No.	COMPLAINANT'S STATEMENT (THIRD STATEMENT CLAIMS)	ISSUE / CONTRADICTION IDENTIFIED	LEGAL / PROCEDURAL IMPLICATION
1)	"The block of flats on BURNCROFT AVENUE is made up of 6 flats within the block... SIMON lives on the floor below me but not directly underneath me."	**Continued Evasion of Address:** Despite providing specific details about the building layout and the Defendant's location, the Complainant still refuses to state her own flat number or address in this document.	**Credibility & Safety:** Suggests an attempt to hide her legal status as an occupier. In a 6-flat block, "floor below me" identifies the Defendant but hiding her own unit suggests she is not a lawful tenant or is avoiding scrutiny.
2)	"In my original statement I stated that in January my neighbour SIMON was banging on my door... He also said he would do the same thing for my children's dad."	**Admission of Previous Falsehood:** Acknowledges the original statement contained a false date ("January"). Blames the police officer for the error.	**Witness Reliability**: If the original statement was false (even partially), the entire evidentiary chain is compromised. Blaming police for a "witness error" is a standard tactic to evade responsibility for lying under oath.
3)	"This actually occurred on the 29th of DECEMBER, and I believe this was an error by the officer taking the statement as I did say it happened in DECEMBER."	**Failure to Correct Sooner**: Claims she told the officer the correct date at the time yet allowed a false statement to stand for months until her Third Statement was required.	**Fabrication Indicator:** Suggests the "error" was not a mistake by police, but a deliberate fabrication in the original statement that is now being "corrected" only because the Defendant's defence exposed the inconsistency.

4)	“I remember because I came back from my mother's house where I had been over Christmas. I woke up at **0615** as I am a type 1 diabetic and had low blood sugar. I was lying down waiting to retest my sugar levels when I heard the communal door open and then banging on my front door and shouting. I knew it was SIMON as I recognise his voice due to him having shouted at me so many times. **I Then Went to The Peephole and Saw It Was Him.”**	**Three Critical Contradictions in One Paragraph**: **(1)** Voice Recognition vs. Visual Confirmation: She claims she "knew it was SIMON as I recognise his voice” yet she then states, "I Then Went to The Peephole and Saw It Was Him." If she recognised his voice "due to him having shouted at me so many times," why did she need to look through the peephole? This suggests uncertainty, not recognition. **(2)** Physical Impossibility: She claims she was "lying down waiting to retest my sugar levels” a passive, weakened state — yet simultaneously heard the communal door open, identified shouting, recognised a specific voice, got up, walked to the door, and looked through the peephole. A person with "low blood sugar" at 06:15 would not have this level of alertness or physical capability. **(3)** "So Many Times" Admission: She admits Simon has "shouted at me so many times” yet in her other statements she claims she has never met him, never spoken to him, and has no contact with him. This admission contradicts her own narrative of a one-sided harassment campaign. Physical Layout Contradiction: The Complainant claims she heard the "communal door open" on the ground floor from her flat on the second floor — yet she simultaneously claims it would be impossible for noise to travel through the joining wall between Flat 115 and Flat 113. If she can hear a ground-floor door from the second floor, she can certainly hear noise through an adjoining wall. The Defendant's evidence is that he was in his own flat (109, ground floor) being disturbed by noise from above, including banging and the door-fitting work. He exited his flat wearing only a nightgown with no underclothes, no shoes, socks, or trainers, to knock on Flat 113 (second floor, directly above him) to identify the source of the noise. He had no reason to go outside or to her door. The video shows him in this state — proving he was responding to internal	**Credibility Collapse**: The Complainant cannot simultaneously claim voice recognition AND need visual confirmation. She cannot claim diabetic incapacity AND rapid physical response. She cannot claim, "no contact" AND "shouted at me so many times." She cannot claim the Defendant came to her door when the video and physical evidence prove he was responding to noise from Flat 113 while undressed and unprepared. These four internal contradictions destroy her reliability as a witness. The detailed medical scripting ("type 1 diabetic," "low blood sugar," "retest") appears designed to elicit sympathy and explain away her own inconsistencies, rather than to record genuine events.

		noise, not initiating contact. The Complainant's claim that he was "banging on my front door" is physically impossible given: **(a)** the Defendant was already disturbed in his own home; **(b)** he was undressed and unprepared for outside contact; **(c)** he knocked on Flat 113, not Flat 115; (d) the video confirms his attire and purpose.	
5)	"In my original statement I stated that I took a video of this and **SENT this to the police**, **but: I actually had a video of a different incident**. . ."	**Admission of Video Misrepresentation**: The Complainant admits the video she submitted to police on 03/08/2025 (exhibited as RO1) was not of the alleged incident on 02/08/2025, but of a different incident (the door fitting in January/February). She blames a "police officer mix up." Procedural Impossibility: If this were a genuine error, the following police procedures would have been required but were not followed: **(a)** RO1 is marked as the first edition ("1"), yet no RO2 (corrected version) was ever produced or disclosed; **(b)** No amended statement was taken from her on 03/08/2025 or thereafter to correct the "error"; **(c)** No second statement was signed by her or the officer to replace the first; **(d)** The "incorrect" video and unsigned statement were retained in the CPS bundle and disclosed as evidence despite being admitted as wrong. Timeline of Deception: The alleged incident occurred on 02/08/2025. Her first statement is dated 02/08/2025 and mentions the video for the first time. Her second statement is dated 03/08/2025, where she still believes she is following the Harassment charge agreed with police. She provides the video (RO1) on 03/08/2025. I was in hospital until brought to the police station on 03/08/2025 at 8am. Police statements all cite Harassment as the reason for arrest. I was detained for Harassment but was booked in for Section 4A, even in interview. The CPS later disclosed materials showing: On 04/08/2025 at 03:33am,	**Fabrication, Evidence Tampering & Abuse of Process**: The prosecution initially disclosed this video as evidence of the crime. The Complainant now admits it is irrelevant. This invalidates the original disclosure. The Complainant's admission that RO1 was the "wrong video" proves she submitted false evidence. The absence of RO2, amended statements, or corrected exhibits proves police and CPS knew the video was wrong but retained it anyway. The recycling of NFA'd evidence into another Criminal charge, combined with the substitution of charges without proper procedure, constitutes a fundamental abuse of process and potentially fraudulent misrepresentation of evidence under the Fraud Act 2006.

		the Harassment and Section 4A cases were marked "Offence Disposal" by police. Another charge (Threats to Cause Criminal Damage) was created and provided to me for the first time, without any involvement with PC Quick (whom I never met). The "Error" Was Never Noticed: The Complainant claims she only noticed the "mix up" in her Third Statement (07/08/2025) five days after submitting the wrong video and after the charge was substituted. If the video were genuinely wrong, police would have reviewed it, requested a correction, and produced an amended exhibit (RO2). None of this occurred. The video was deliberately retained and recycled from a previous case that was already "No Further Actioned" to bolster a failing prosecution.	
6)	"When I was getting a **New Door Fitted**. This was a mix up by the police officer taking the statement at the time.!"	**Blaming Police for "Mix Up":** Claims police error again regarding the door incident video.	**Pattern of "Errors":** A pattern of "police errors" benefiting the prosecution and harming the defence is statistically improbable and suggests coordinated fabrication.
7)	"I mentioned that in **JANUARY** I was getting a new door fitted when SIMON came to my front door and started shouting that he would hit me, hit my eldest daughter and drag my unborn baby out my stomach."	**Recycled Evidence from Failed Case:** The video the Complainant provided was originally part of a Harassment allegation that the CPS dropped (NFA). The CPS determined her evidence was insufficient to support Harassment. The same video was then recycled to support a substituted charge of Threats to Cause Criminal Damage. The video contains no pauses in speech where the alleged threats could have occurred. The Complainant's testimony was already dropped by the CPS for the original charge, yet she is now reusing the same discredited evidence for a new offence.	**Abuse of Process**: The CPS cannot use evidence it has already admitted is insufficient to support one charge, then repackage it to support another. This is a fundamental breach of fair trial rights and demonstrates the prosecution's desperation to secure a conviction using unreliable evidence.
8)	"He was stood outside the threshold of my front door in the communal hallway. I was stood inside my flat the entire time."	**Direct Contradiction of First Statement**: In her First Statement, she claimed the Defendant was "banging on my door" and that she "went to the peephole and saw him." In this Third Statement, she claims she was "inside my flat the entire time" and never approached the door.	**Fabrication & Misrepresentation**: The Complainant has provided three different versions of her physical location during the alleged incidents. The video handover on 03/08/25 was deliberately presented as evidence of the current charge when it was not. This constitutes a

		These accounts are mutually exclusive. Furthermore, she handed a video to police on 03/08/25 (the day after the alleged incident) which she now admits was of a different incident (the door fitting in January/February). This confirms she had no actual video evidence of the 2nd of August incident and was attempting to mislead police with recycled footage.	deliberate attempt to pervert the course of justice by submitting false evidence.
9)	"This is the incident that I filmed and sent to police, and I have since seen that I actually filmed that video on the **3rd of FEBRUARY 2025** and not in **JANUARY**."	**Consciousness of Guilt**: The Complainant admits she "only just noticed" the correct date after reviewing the video. However, the video was in her possession since 03/08/2025 and was the central exhibit in her allegations. It is implausible that she only noticed the true date five months later in her Third Statement. The change from January to February aligns exactly with the Defendant's disclosure of council door replacement schedules, proving the date was altered to match the Defendant's evidence rather than to correct an honest mistake. Cross-Reference to the table below: Timeline Analysis **(Point 6):** I refer, the Court towards Exhibit: **"06. Timeline of Swapped / Altered Events in Rebecca O'Hare's Statements"** (contained within this bundle at Point 6 / Table 5). This table summarises the chronological inconsistencies, including: **(a)** the date change from January 2025 to 29 December 2024 for the door-banging allegation; **(b)** the date change from January 2025 to 3 February 2025 for the door-fitting allegation (the subject of this item); **(c)** the location change from Communal Corridor to Staircase for the 2 August 2025 allegation; **(d)** the addition of a new historic allegation from 2021 in her Third Statement. The table demonstrates a pattern of systematic alteration across all three statements, with each "Correction" occurring only after the Defendant disclosed evidence that contradicted her previous account.	**Fabrication**: The "correction" is not a mistake; it is a deliberate alteration to cover up the council's involvement in the door fitting. If the video truly showed February, her First and Second Statements (both saying January) were lies. If the video showed January, her Third Statement is the lie. Either way, she has perjured herself. The pattern of alterations documented in Point 6 / Table 5 proves this was not isolated error, but conscious, repeated fabrication designed to secure a wrongful conviction.
10)	**"It is hard to hear what is said on the**	**210 Days to Review, Yet Rebbecca O'Hare Lies About Content**: The	**Perjury, Fabrication & Tenancy Fraud**: The Complainant has

	video, but I **believe** he said he would **hurt me** and **my unborn child** as he was **walking from my front door back into the communal corridor**."	Complainant originally stated the door incident occurred in "early January" in her First Statement. The true date was 4 January 2025, when Gerda Security Products Limited (Enfield Council subcontractor) installed fire doors at 115 Burncroft Avenue as part of council works. This is proven by Exhibit A5 (council records). From 4 January 2025 to her arrest on 2 August 2025 is 210 days (7 months). Despite this extensive period reviewing her own video, she: (a) Changed the date from January to 3 February 2025 in her Third Statement; (b) Claims "It is hard to hear what is said on the video, but I believe he said he would hurt me..." The video (RO1) is clear and audible. It shows the Defendant knocking on a neighbours door, the Complainant emerging without a door frame, a heated debate where she plays victim, and the Defendant retreating while shouting truths — no threats to her or her "unborn child." The date change from 4 January to 3 February was made only after the Defendant disclosed Exhibit A5 (council/Gerda records). This proves the change was deliberate, designed to hide council ownership of the flat and her lack of legal tenancy. Cross-Reference: See Point 6 / Table 5 (Timeline of Swapped/Altered Events) and Exhibit A5 (Gerda Security Products Limited installation records: 4-5 February 2025 for 113/115 Burncroft Avenue — note: her "3 February" is still false, even by council records).	knowingly altered the date of a council-contracted event to conceal her illegal occupation of a council flat. She has misrepresented the content of her own video after 210 days of opportunity to review it. The video objectively disproves her account. This is not error; it is deliberate, repeated fabrication to secure a wrongful conviction and hide tenancy fraud.
The prior is about the No Further Actioned Harassment case as this statement. **This is the third statement and as done after the no further action.** **This CPS still allowed Rebecca O'Hare to add this information, which unmorally and against principles clouds judgement of a fair and speedy trial.** **The next part is About the day in question within the court dated the 02/08/2026**			
11)	"I would like to clarify that the incident which occurred on **Saturday 2nd August 2025** occurred in the communal building **corridor on the staircase."**	**Location Change (Critical):** First Statement said, "Communal Corridor" (landing). Second Statement changed to "Staircase." Third Statement repeats "Staircase" but adds "communal building corridor" merging two separate locations.	**Moving the Crime Scene**: The Complainant cannot decide where the alleged threat occurred. Each "clarification" contradicts the previous account. This undermines the entire allegation.

12)	**“This is where SIMON said, "I WILL BLOW UP YOUR CAR" and "I WILL BLOW IT TO THE OTHER SIDE OF THE STREET."**	**Escalation of Threats**: These specific quotes appear only in later statements, not the First Statement.	**Embellishment**: Adding dramatic, specific threats in later statements suggests the original allegation was insufficient. This is "padding" to secure conviction.
13)	“He also said, "WHEN YOU COME AND ASK *ME ABOUT IT, I'LL TELL YOU IT WASN'T ME"* and ***"I'LL COME AND LOOK FOR YOU AT YOUR NEW HOUSE."***	**Further Embellishment**: More specific quotes added only in Third Statement. "Your new house" implies knowledge of her moving — information she never disclosed.	**Fabrication**: These quotes appear rehearsed and designed to sound sinister. The "new house" reference suggests she invented this after learning of her own precarious tenancy status.
Another incident Never mentioned before nor was I charged for!			
14)	**“I would like to add an incident which happened between SIMON and me**: In **2021** called 101 because of him too	**New Historic Allegation (Critical):** Introduces entirely new incident from 2021, never mentioned in Statements 1 or 2.	**Prejudicial Late Addition**: Expands scope beyond charged incident. Designed to paint Defendant as long-term threat. Never charged, never investigated, never disclosed until after Defence was released.
15)	I was about to walk down the stairs to take my daughter outside when SIMON came to the bottom of the stairs. I looked down. He looked up. He started going off saying "YOU'RE A HORRIBLE PERSON" " YOU'RE A SHIT MUM" "WHEN YOUR DAUGHTER IS NOT THERE, I AM GOING TO COME LOOKING FOR YOU". I waited for him to go and then left to my friend's house.”	**Detailed Scripting**: Highly specific dialogue from 4 years prior, recalled with precision impossible after so long.	**Implausible Recollection**: Memory does not function this way. The level of detail proves fabrication. The "101 call" was never produced, suggesting it never happened.

7. Timeline of Swapped / Altered Events in Rebecca O’Hare’s Statements

Claimed Date / Place (Original)	Later “Clarified” Date / Place	Event Description	Issue / Contradiction
January 2025 – Doorway	29 December 2024 – Outside of her front door!	**Allegation**: It is said that Simon banging on her door, shouting threats (“I’ll punch you up, slap you	**First claimed January**: later changed to December. Shows inconsistency in recollection and officer recording. She admits she only identified me by voice,

		up, your daughter, children's dad").	then "**went to the peephole and saw it was him.**" Her own words prove she was uncertain who was speaking before she went to the peephole and never continued! "**Rebecca O'Hare"** admits she cannot confirm it was me.
January 2025 – Door fitting	3 February 2025 – Enfield Council Door fitting	**Allegation**: it is alleged that Simon was shouting threats during new door fitting ("hit me, hit my eldest daughter, drag unborn baby out my stomach"). Video evidence claimed.	**First said January**: later she admitted she was wrong again as the video was filmed on **3rd of February**. Contradiction between statement and actual evidence date. Video vs. real life do not align. "**Rebecca O'Hare"** had "**180 days"** since the "**3rd of Feb till the 2nd of Aug 2025**" to review her own footage yet she still misquoted events. **She admits**: **1) It is hard to hear what is said on the video,** but **I believe** he said he would **hurt me** and **my unborn child** as he was **walking from my front door back into the communal corridor**. but "**Rebecca O'Hare"** still believes she can hear me saying thing that her own video proves otherwise. Even the "**CPS**" confirmed this was not said, which is why the harassment case was dropped.
2 August 2025 – Communal Corridor (First Statement)	2 August 2025 – Staircase (Second Statement)	**Allegation**: Simon is wrongly accused of threatened to blow up her car ("I'll blow it to the other side of the street").	**Place Of Incident Swapped in Rebecca O'Hare First Claimed Statement**: She stated she heard my door slam as she was going downstairs, but she only saw my back. This would mean I was entering the block of flats, not leaving my front door. She also stated she went outside the communal front door straight after, which proves her account does not match the physical layout. **In "Rebecca O'Hare" Third Statement**: she changed the location again, saying it happened on the stairs. This is impossible, as I have already demonstrated with images in my defence documents. These contradictions undermine the reliability of her account.

			Reference: 1+ **Weblink**: 04. Four -Rebecca O Hare Three Different Statements.pdf 2+ **Exhibit**: Evidence: Exhibit 11 / **Rebecca O'Hare:** also added new context in her third statement that was never mentioned before: *"I'll come and look for you at your new house."* This was fabricated after my defence was released. **Conclusion:** Rebecca O'Hare's statements are inconsistent, unstable, and must carry no weight in these proceedings.
No date given originally	2021 (unspecified)	**Allegation**: Simons wrongly accused of verbally abusing her on stairwell ("You're a horrible person, shit mum, I'll come looking for you").	Historic allegation added only in "**Rebecca O'Hare"** third statement, not part of original disclosure. Expands scope beyond charged incident. Shows fabrication and attempt to widen her case unlawfully.

8. **The CPS Digital Case Ratio Folder, Summary of Metadata Evidence 05/11/2025**
I refer the Court to **Exhibit 09: "Case Ratio Extract Created Date"** for the full technical evidence. However, the key facts are summarised here:
How I Obtained This Evidence: The CPS attempted to serve me disclosure files through their Case Ratio system. Due to my lack of solicitor at the time, I received an **unserved copy** of the CPS internal Case Ratio Folder — including a working weblink, username, and password. This allowed me to access the **metadata** that the CPS never intended me to see.

What the Metadata Proves:

Finding	Significance
Created by: User 2258 on 10/10/2025 at 12:17	The entire Case Ratio archive was created **two months after charge** (03/08/2025), not contemporaneously
Modified by: User 2258 on 10/10/2025 at 12:17	The archive was **generated**, not updated — proving reconstruction, not maintenance
Third Statement dated 07/08/2025	This statement **did not exist** in the first disclosure of **01/09/2025** — yet it claims to be dated **before** that disclosure
Only two statements in first disclosure	The CPS's own records prove they originally had **two statements**, not three

The Fraud in Simple Terms:

Date	What CPS Disclosed	What Actually Happened
01/09/2025	Two Rebecca O'Hare statements	This was the **true** initial disclosure
10/10/2025	"Case Ratio Folder" created	CPS **rebuilt** the archive, inserting the Third Statement

07/08/2025 (claimed)	Date on Third Statement	**Impossible** — the statement did not exist in 01/09/2025 disclosure
10/10/2025 (actual)	True creation date	The statement was **written and backdated** after my defence was disclosed

Defence Position:

The CPS disclosure trail demonstrates **unlawful alteration of evidence**:

1) **01/09/2025:** Only two O'Hare statements disclosed — confirmed by first bundle index
2) **10/10/2025:** Third statement suddenly appears, backdated to 07/08/2025
3) **Metadata (10/10/2025):** Case Ratio Folder created, not updated — proving reconstruction
4) **Result:** The Third Statement is a **fabricated document**, inserted to bolster a failing prosecution after the original harassment charge was dropped

This undermines the integrity of disclosure, demonstrates **unlawful alteration of evidence**, and infringes my **right to a fair trial under Article 6 ECHR**.

This is a Procedural Breach When following the Manual of Guidance "2011 + NFS 2015: Because as the Defendant, it has become my understanding that The Official copy of the published Manual of Guidance set he requirements that "Case Ratio Files Must Exist Before CPS Can Lawfully Charge or Impose Bail Conditions." Apart of my Defence is that the CPS Case Ratio Folder that the CPS gave to me, can only be develop by the CPS Internally.

9. The CPS Case Ratio Index: Discrepancies in Disclosure

I refer the Court to Exhibit 09: "Case Ratio Extract Created Date" and the CPS-caseratio-10-10-25-Casefiles disclosed to me.

A. The Index Disclosed by CPS

The CPS Provided This Index as Part of Their 10/10/2025 Disclosure:

No.	Statement(s), Deposition(s) & Documents (Other Than Exhibits)	Statement Date	Page(s)	Notes
1	Rebecca O'HARE	03/08/2025	1	Original
	– Ditto –	03/08/2025	2	Same witness, duplicate entry
	– Ditto –	02/08/2025	3–4	Same witness, earlier date
	– Ditto –	**07/08/2025**	**5–6**	**Backdated statement, added only in CPS-caseratio-10-10-25 files**
2	George Samuel Wilson-Wallis	Undated	—	Witness statement without date
3	S9 Notice/1 – Simon CORDELL	—	7–8	Defence notice

B. What "Ditto" Reveals

In formal documents, "Ditto" means "same as above." The CPS used this to avoid repeating Rebecca O'Hare's name four times.

C. The 07/08/2025 Entry

I observe the following:

- The **01/09/2025** disclosure contained two statements from Rebecca O'Hare (confirmed by first bundle index)
- The **10/10/2025** disclosure suddenly contained four entries, including one dated 07/08/2025

- The **07/08/2025** entry claims to pre-date the 01/09/2025 disclosure, yet was not present in that disclosure

D. Signature Observations: Statement Signature Status
- **First "03/08/2025:** Unsigned by witness and officer
- **Second "03/08/2025:** Appears as black redacted marker
- **Fourth "07/08/2025:** Added in later disclosure

E. My Conclusion
These discrepancies are the sudden appearance of the 07/08/2025 entry, its absence from the first disclosure, and the irregular signatures, form the basis of my separate Application to Exclude Evidence under Section 78 PACE 1984 and Application to Stay for Abuse of Process. I refer the Court to those documents for the legal argument arising from these facts.

10. Alleged Procedural Breach
The disclosure officer "Joel Avigdor" dated the added statement to **07/08/2025**, while "CPS prosecutor J. Rainbird," was involved as of **22/09/2025**.
A police officer can technically be both disclosure officer and statement taker, but it is "Bad Practice" and open to challenge.
Backdating A Statement Is Unlawful: When PC Avigdor backdated Rebecca O'Hare's third statement, with her that amounted to "Serious Misconduct and Even Criminal Liability."
- *"I have added not to reflect my concerns and placed them within the "04. Application to Exclude Evidence Under Section 78," File attached to my defence bundle!"*

11. What Else Happened in Rebecca O'Hare's First Statement, Through Time and My Defence Being Issued Is:
Dated: 02/08/2025.
Disclosure of Statement: I was served with "*Rebecca O'Hare's First Statement*" on **01/09/2025** by Tuckers Solicitor Firm, marked as an official MG11 statement and with this statement was one other statement of hers disclosed, what equals to just two statements from her.
Missing Signatures from the First Statement: "At the Time of Disclosure, Rebecca O'Hare's First Statement Was Incomplete:
A. All three pages required signatures from both Rebecca O'Hare and the attending police officer but "Both of Their Signatures are Missing."
B. **It Is Also Important That**: In the disclosed files served by Tuckers Solicitor firm to me on the **01/09/2025**, there Were No Placeholder Boxes Visible Where the Signatures Should Have Appeared, As Well!
- **Critical Change After Tuckers Left**
  - **A.** On **10-10-25**, Tuckers withdrew from my cases.
  - **B.** On that same day, they handed me the Case Ratio files by way of email and as dated the same day of the Case Ratio Folder being developed as creation.
  - **C.** After the postponement of the trial dated the **13/10/2025** I was able to notice the following differences in the case Ration folders files:
    - Signature locations now had "Transparent Square Bordered Boxes" as placeholders.
    - Intelligence was redacted (blacked out).
    - No "Certification or Embedded Audit Trail" to show when/why these changes were made.
  - **D. After All of This I Noticed:** The Third Alleged statement from Rebbecca O 'Hare that is backdated and modified to be adaptive to my defence statement contradicting all her previous statements.
    * **This Is the Second Exhibited Video Created: No Signatures then modded statements afterwards.**
      1) 16-11-25-Vid x2 Case Ratio Created-Date
    * **This Is the First Exhibited Video Created:**
      2) 69.1. 05-11-25-CPS Case Ratio Website

E. File Metadata

The File Is Labelled: "*01. Cordell Simon 01YE1267925 Initial Details Pros Case 22-09-2025*".
But instead of being updated properly, it was "Altered with Added Material" and without certification.

F. Why This Is Problematic:

- **Disclosure Rules (CPIA 1996):** Witness statements must be disclosed in their original form, with signatures intact.
- **Modification Without Certification:** Adding placeholders and redactions without an audit trail is irregular and potentially unlawful.
- **Timing:** The fact that these changes only appeared "After Tuckers Left" and just "3 Days Before Trial" raises fundamental questions about tampering.
- **Legal Implication:** This must amount to "Perverting the Course of Justice" and "Misconduct in Public Office" due to "CPS/Police Knowingly Altered Disclosure Material."
- **In Plain Terms:** I am saying that Rebbecca O 'Hares official MG11 statement was originally missing signatures but had no placeholder boxes and "Only After Tuckers Left On 10-10-25 Did the Modified Version Appear" and with: *"Transparent Square Boxes Where Signatures Should Be, Redacted Intel, And No Certification."* That sequence of events strongly proves "Tampering with Disclosure Material Right Before Trial," to illegally set me up, with "The Metropolitan Police and Highbury & Islington Courthouse Staff & Rebecca O'Hare's Crime Spree, all involved!"

12. About Rebecca O'Hare's Second Statement:

A. Dated 03/08/2025.

- We explain this as the second statement of Rebecca O'Hare's is marked with *"Witness Signature: Rebecca O'Hare."*
- Yet the signature is not a genuine handwritten mark. Instead, it appears as a "Typed Insertion," not a physical signature.
- If A Real Signature Had Been Present but Redacted: it would have been obscured with a black marker effect. No such redaction exists.
- Crucially, the "Police Case Handler's Signature" is also absent. There is no indication of redaction, nor any authentic officer endorsement.

B. MG11 Statement Requirements:

An MG11 witness statement must be signed in person by the witness and countersigned by the officer taking it and this has not happened! Rebecca O'Hare Second Statement*:* must not be amended or substituted with typed placeholders as it is as the absence of both real signatures demonstrates that the statement was not properly executed and in turn breaches these court proceedings.

C. Implication of the Signature:

The typed "Witness Signature: Rebecca O'Hare" strongly suggests:

1) Rebecca O'Hare was "Not Present" when the statement was prepared.
2) "The MG11 Statement" was "Not Brought to Her for Personal Signature."
3) The document therefore fails to meet the evidential threshold for admissibility without verification in court.

D. Contradictions with the Second and First Statements:

When Rebecca O'Hare's Second Statement (Purportedly Dated 03/08/2025) Is Compared Against Her Earlier Statements the First, (Purportedly Dated 02/08/2025) The Following Contradictions Emerge:

1) The Second statement of "**Rebecca O'Hare's"** relies on the existence of a properly signed prior First statement from "**Rebecca O'Hare"** but her first Statement is not signed by any person.
2) Since the second statement was not genuinely signed as well, the third statement cannot logically derive from it!
3) **This Undermines the Prosecuting Teams Claims**: that "**Rebecca O'Hare's First, Second, And Third Statements**" were all contemporaneously created in accordance with required protocols.

4) **Instead**: the evidence points to the third statement also being "**Fabricated or Backdated,"** as the first two statements of her prove also and later disclosure irregularities now confirm these facts!

E. My Defence Position

The irregular signature practices and contradictions between the second and third statements demonstrate that Rebecca O'Hare's statements could not have been Signed on **02/08/2025**, nor the 03**/08/2025**, despite the prosecution's attempt to imply otherwise. This supports the defence argument that disclosure was unlawfully and wrongly altered after charge, "**Breaching CPIA 1996 And Crim PR 15.4."**

13. A Quick Short Reminder:

By This Stage and Date: Dated the 01-09-2025 it is asserted that "Rebecca O'Hare Had Produced Only Two Separate Statements." However, if that were true, the later "Third Statement" cannot logically stand, particularly when examined against the context within it and as it is backdated as the 07/08/2025 as it would have been already included in the first cps files given to Turkers Solicitor Firm.

- **Witness Statement Closing Submissions**
  Legal Characterisation of Rebecca's Conduct
  (a) **Fraud by False Representation (s.2)**
  By permitting her third statement to be "Backdated and Presented as If Contemporaneous," Rebecca O'Hare created an alleged false representation with the Police to be herd as her tendered evidence in the court. The representation was dishonest because it concealed the true creation date and shows intent of her commitment to change her narrative of events based upon an entirely different account to strengthen the prosecution case, turning her **"First Statement"** into fiction and **"Second Statement"** as her own Admittance of criminal activities and **"Third Statement"** as Rebbecca O'Hare's side stepped the real narrative as her Hox became transparent leaving her to choose to continue with her further attempts to deceive the court in the aid of her getting away from her own Hox.
  (b) **Fraud by Failing to Disclose Information (s.3)**
  By disclosing that her statement was "Altered After My Defence Was Served," she failed in her duty to provide truthful, complete information. This Altered omission was set to mislead the courts and denied me fair disclosure.
  (c) **Fraud by Abuse of Position (s.4)**
  As a complainant/witness, she occupies a position of trust in the justice process. By allowing her evidence to be **"Adapted to Fit the CPS Narrative,"** she abused that position to cause you disadvantage and risk of wrongful conviction.

- **Procedural Impact**
  (a) Her cooperation with the CPS in modifying statements after disclosure undermines the integrity of the evidence bundle.
  (b) It demonstrates collusion in "**Retroactive Fabrication of Disclosure,**" which is unlawful under the Criminal Procedure and Investigations Act 1996.
  (c) It directly contributed to the CPS's ability to present a "**Case Ratio File Archive"** that was created after charge but disguised as original.



(Signed) Mr. Simon Paul CORDELL) (Date Signed) 18/10/2026
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