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 [5] 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) (Date Signed) 18/10/2026

1. **Witness Statement – Case Ratio Disclosure, Fabricated Statements and Back-Dating:**
   - **A. CORDELL Simon – 01YE1267925**
     - 00. 16-11-25-Vid x2 Case Ratio Created-Date
     - 69.1. 05-11-25-CPS Case Ratio Website

2. **CORDELL Simon 01YE1267925 Initial Details Pros Case 22-09-2025:**
   - A. Date 05 Aug 2025 History ID File Name Description 19328247 19328247.pdf
   - B. CORDELL Simon 01YE1267925 Section 9 22 Sep 2025 22 Sep 2025 19568884 19568884.pdf
   - C. **CORDELL Simon 01YE1267925 Unused Material Disclosure 19569225 19569225.pdf**
   - D. CORDELL Simon 01YE1267925 Initial Details Pros Case Size 554KB 384KB 2MB Video Files (All from 29 Aug 2025) History ID File Name Description Size 19441494 19441494.**mp4**
   - E. Axon_Interview-Interview_Room_7-Camera-1 12MB 19441496 19441496.mp4 ROH_01 22MB
   - F. History ID File Name Description Size 19441495 19441495.mp4
   - G. CKC_01_Witnessing_arrest_of_Simon_Cordell 367MB.

3. **Defence Statement Introduction:**
   This section explains why the CPS Case Ratio folder and its metadata are central to my defence. Case Ratio is the CPS's own disclosure system, and only the CPS can create or populate these folders. Because of that, the creation date and contents of the Case Ratio folder show exactly what evidence existed at the time and what did not.
   The Case Ratio folder for this case "**Was Not Created at Charge On 03/08/25,**" as "**Required by CPIA 1996 And the Criminal Procedure Rules.**" Instead, the CPS created the folder on **10/10/25**, over two months later. This proves the prosecution did not have a contemporaneous IDPC and that the disclosure was reconstructed after the fact.
   The First Disclosure On 01/09/25 Did Not Contain Rebecca O'Hare's Third Statement: The second disclosure on **10/10/25** suddenly did. Because defence solicitors cannot create or alter Case Ratio folders, the CPS's own metadata shows that this statement was added later and backdated.
   This section sets out the evidence of late creation, missing documents, contradictory dates, and retroactive insertion, demonstrating "**Breaches of CPIA 1996, The Attorney General's Guidelines, PACE S.78, And Article 6 ECHR.**"

4. **What Case Ratio Is and Who Controls It:**
   Case Ratio is a CPS-controlled disclosure platform. It is used by prosecutors to package and serve disclosure **Witness Statements, Custody Logs, BWV**" for an example to defence solicitors. The metadata (creation dates, folder IDs, user IDs) is generated by the CPS system itself when they build the disclosure bundle. Defence solicitors cannot lawfully create, backdate, or alter Case Ratio folders. They can only download, store, and re-organise files once served. Any Case Ratio folder presented as official disclosure is

therefore a CPS evidential artefact, not a defence construct.

A. **Why This Matters:** Because the CPS alone controls Case Ratio, the dates and contents of each folder are their own record of what existed, and when. If a Case Ratio folder shows a creation date of **10/10/25**, then that is the CPS's own disclosure record. Defence solicitors cannot alter that metadata or create new folders with evidential status. Therefore, the absence of certain documents in the first disclosure and their sudden appearance in the second disclosure proves they were inserted later by CPS, not by my solicitor.

5. **First Disclosure (01/09/25) "What Was and Was Not There:**
   A. **On 01/09/2025**: Tuckers served the first disclosure to me as lose PDFs.
      1) **Files Included**: *01. Case_Summary_pdf.pdf* and other initial witness statements.
      2) **There Was No File Titled**: *01. CORDELL Simon 01YE1267925 Initial Details Pros Case 22-09-2025.pdf.*
      3) **Critically**: Rebecca O'Hare's so-called "**Third Statement**" (allegedly dated **07/08/25**) was "**Not Present!"** in that disclosure at all.
         This shows that at the time of first disclosure, only her first and second statements were served. The "third statement" did not exist in the prosecution bundle on **01/09/25**.

   B. **Chronology Entry "For Clarity:**
      1) **Date:** 01 September 2025
      2) **Event:** First disclosure served by Tuckers as loose PDFs.
      3) **What Happened:** File *01. Case_Summary_pdf.pdf* contained the initial case summary and witness statements. Rebecca O'Hare's third statement dated 07/08/25 was absent. No file titled *01. CORDELL Simon 01YE1267925 Initial Details Pros Case **22-09-2025**.pdf* existed at this time.
      4) **Procedural Breach:** Under CPIA 1996 and the Criminal Procedure Rules, the Initial Details of the Prosecution Case (IDPC) ought to have been created at charge (**03/08/25**). Its absence in the first disclosure proves the third statement did not exist contemporaneously and was later inserted when the Case Ratio folder was created on **10/10/25**.
      5) **Defence Value:** Demonstrates that Rebecca O'Hare's third statement was fabricated after the fact and unlawfully backdated. Supports exclusion under section 78 PACE and undermines CPS credibility.

6. **Second Disclosure (10/10/25) – Rebuilt Bundle and Sudden Appearance:**
   On 10/10/25, a second disclosure was served.
   A. Files now included: *01. CORDELL Simon 01YE1267925 Initial Details Pros Case 22-09-2025.pdf.*
   B. This consolidated IDPC file now "**Contained"** Rebecca O'Hare's "**Third Statement**" (purporting to be dated **07/08/25**).
   C. **Metadata Shows the Case Ratio Folder Itself** was created on **10/10/25**, not contemporaneously with the charge swap on **03/08/25** at Wood Green Police Station.
   D. The redactions and restructuring indicate the file was "**Rebuilt Later,**" not simply updated.
   This proves that the "third statement" was not part of the original IDPC and was only introduced after the Case Ratio folder was constructed.

7. **Case Ratio Extract – CPS's Own Metadata Proving Reconstruction**
   I lawfully extracted the following information from the CPS Case Ratio server for the case relating to 02/08/25 and reconstructed it as follows:
   A. **Case Summary: Case 1_13.10.25**
      1) **Reference ID**: 255722
      2) **Reference Number**: COR10388/00001
      3) **Password**: Jbi3HseG**********
      4) **Expire**: 13 October 2026
      5) **Download Package**: CaseRatio_COR10388_00001.zip

6) **Encrypted Share ID**: quU4V8N4J53-BPNqwbZT4w2
7) **CREATED BY:** USER **2258** ON **10 OCTOBER 2025** AT **12:17**
8) **MODIFIED BY:** USER **2258** ON **10 OCTOBER 2025** AT **12:17**

This metadata shows that the entire Case Ratio package for this case was "**Generated On 10/10/2025,**" long after the incident and long after earlier court hearings.

B. PDF Documents (Chronological)

Pdf, Docx Files Human Input Files Title Dates.	History ID	File Name	Description	Size
05 Aug 2025, is. **5 DAYS BEFORE** the created by: user 2258 on 10 October 2025 at 12:17.	19328247	19328247.pdf	**05 Aug 2025** CORDELL Simon 01YE1267925 Section 9	554KB
22 Sep 2025, is. **12 DAYS AFTER** the created by: user 2258 on 10 October 2025 at 12:17.	19568884	19568884.pdf	**22 Sep 2025** CORDELL Simon 01YE1267925 Unused Material Disclosure	384KB
22 Sep 2025, is. **12 DAYS AFTER** the created by: user 2258 on 10 October 2025 at 12:17.	19569225	19569225.pdf	**22 Sep 2025** CORDELL Simon 01YE1267925 Initial Details Pros Case	2MB

C. PDF Documents Listed Inside That Package:

1) **05 Aug 2025: --**
   * **History ID**: 19328247
   * **File**: 19328247.pdf
   * **Description**: CORDELL Simon 01YE1267925 Section 9
   * **Size**: 554KB
2) **22 Sep 2025: --**
   * **History ID**: 19568884
   * **File**: 19568884.pdf
   * **Description**: CORDELL Simon 01YE1267925 Unused Material Disclosure
   * **Size**: 384KB
3) **22 Sep 2025: --**
   * **History ID**: 19569225
   * **File**: 19569225.pdf
   * **Description**: CORDELL Simon 01YE1267925 Initial Details Pros Case
   * **Size**: 2MB

The problem is obvious: the Case Ratio package was "**Created On 10/10/25,**" yet it contains files bearing dates both "**Before**" and "**After"** that creation date. This is only possible if the bundle was reconstructed and populated retrospectively, with back-dated PDFs inserted later.

D. Video Files (All From 29 Aug 2025):

1) **History ID**: 19441494 – Axon_Interview-Interview_Room_7-Camera-1 – 12MB
2) **History ID**: 19441496 – ROH_01 – 22MB
3) **History ID**: 19441495 – CKC_01_Witnessing_arrest_of_Simon_Cordell – 367MB.

All are dated 29/08/2025, weeks after the **02/08/25** incident and the **03/08/25** arrest and interview. This again shows late uploading and a non-contemporaneous chain of custody.

E. Video Files (All from 29 Aug 2025)

History ID	File Name	Description	Size
19441494	19441494.mp4	Axon_Interview-Interview_Room_7-Camera-1	12MB
19441496	19441496.mp4	ROH_01	22MB
19441495	19441495.mp4	CKC_01_Witnessing_arrest_of_Simon_Cordell	367MB

F. Why The Folder Should Have Existed at Charge (03/08/25)

Under CPIA 1996 and the Criminal Procedure Rules, the Initial Details of the Prosecution Case (IDPC) should be created and served at the point of charge or first hearing. In this case:

1) The section 4A matter was dropped (NFA) in the early hours of **04/08/25**.
2) The URN was then swapped to another charge of **"Threats to Cause Criminal Damage**."
3) At that point, the CPS ought to have created an IDPC and corresponding Case Ratio folder so that all then-existing witness statements and evidence could be stored and served.

G. Why the Folder Should Have Existed on 03/08/25.

1) **Law & Procedure:**
   * Under CPIA 1996 and Criminal Procedure Rules, the "**Initial Details of the Prosecution Case (IDPC)"** must be created and served at the point of charge or first hearing.
   * That means the Case Ratio folder should have been built on **03/08/25** when the charge was swapped from Section 4A (NFA) to threats to cause criminal damage.
   * All witness statements existing at that time should have been inside it.

H. Implication:

1) Because the Case Ratio folder was only created on **10/10/25**, it proves the "third statement" was not contemporaneous.
2) Its absence in the first disclosure (01/09/25) and sudden appearance in the second disclosure (10/10/25) shows it was "**Added Later and Backdated**."

I. The Fact That the Relevant Case Ratio Folder Was Not Created Until 10/10/25 Means:

1) There was no contemporaneous IDPC at the time of charge.
2) The prosecution case was "**Constructed Later**."
3) Any document purporting to be part of a **03/08/25** disclosure but appearing only in a **10/10/25** Case Ratio build is, by definition, "Not Contemporaneous."

J. Specifically, Because:

1) The first disclosure on **01/09/25** did not contain Rebecca O'Hare's third statement; and
2) The Case Ratio folder was only created on **10/10/2025** and then used to generate a second disclosure that did contain this statement.

- **It Follows That:**
  1) The "Third Statement" did not exist at the time of first disclosure.
  2) It was later added and backdated to **07/08/2025**.

8. Red flags in the statement schedule and signatures

I have supported my statements with Exhibited evidence, so, that my suspicions about fabricated or retroactively added statements by CPS & Rebbecca O'Hare are supported.

The following issues arise from the schedules and statements:

A. Inconsistent Dates for The Same Witness (Rebecca O'HARE): Multiple dates appear for her statements (**E.G., 02/08/2025, 03/08/2025, 07/08/2025**). The dates jump around, including one before the first listed date, which is odd if they were listed chronologically and properly recorded.

B. Undated entry – George Samuel Wilson-Wallis: His statement is explicitly marked **"Undated**." In legal

proceedings, every statement should be dated to establish its timeline and authenticity. An undated statement is inherently suspected.

C. **S9 Notice Timing:** My own S9 notice is listed as pages 7–8 but with no date supplied, which weakens its integrity within the document set.

D. **Disclosure Officer Signature Date:** PC Avigdor signed as disclosure officer on **07/08/2025**. If statements were added after this date, it means the disclosure officer signed off before all evidence was finalized.

E. **CPS Prosecutor Signature Date:** The prosecutor (Jrainbird) signed on **22/09/2025**, over a month later. If any statements were added or altered between **07/08/2025** and **22/09/2025**, that should have been documented with amendment certificates and transparent disclosure. It was not.

F. **These Irregularities Support the Interpretation That**:

1) The CPS or police realised the dates did not match the true timeline of events.
2) Additional statements were created or inserted later to cover gaps or inconsistencies.
3) "**Ditto**" and "**Undated**" entries were used to mask missing or late documentation and to reduce the chance of scrutiny.

9. **Defence Position and Legal Consequences:**

Taken together, the Case Ratio metadata, the first and second disclosure comparison, the absence and later sudden appearance of Rebecca O'Hare's third statement, the inconsistent dates, undated witness entries, and non-contemporaneous video uploads demonstrate that:

- The prosecution disclosure was "**Not Created Contemporaneously with The Events**."
- Key documents were "**Retrospectively Constructed, Inserted, Or Backdated**."
- The CPS's own Case Ratio system proves this because the official folder was only created on **10/10/25** and then populated with files claiming earlier dates.
- My solicitor could not have created or altered this Case Ratio folder; responsibility for its content and timing lies entirely with the CPS.

A. **These Failures Amount To:**

1) Breach of CPIA 1996 (failure to provide timely, complete, and accurate disclosure).
2) Breach of the Attorney General's Guidelines on Disclosure.
3) False representation under the Fraud Act 2006, section 2 (presenting back-dated, non-contemporaneous documents as if they were original and genuine).
4) Unfairness under section 78 PACE, warranting exclusion from such evidence.
5) Infringement of Article 6 ECHR (right to a fair trial) due to a manipulated and reconstructed evidential record.

B. **The Defence Therefore Submits That:**

1) Rebecca O'Hare's "**Third Statement**" and any document that only appears for the first time in the **10/10/25** Case Ratio build must be treated as "**Fraudulent Retrospective, non-Contemporaneous, And Unreliable.**"
2) Such materials should be excluded under section 78 PACE.
3) The integrity of the entire prosecution case is compromised by the CPS's own metadata and disclosure history.

- **P.S:** Tuckers Solicitor Firms Staff till date of this defence statement has refused to reply to any correspondence.
  Mr. Simon Paul Cordell.



(Signed) Mr. Simon Paul CORDELL) (Date Signed) 18/10/2025