

evidence are set out in the appended chronology. The court is invited to take particular note of the evidence supporting the conclusion that the Appellant was integrally involved in the organization of raves and/or the supply of equipment:

4. The Appellant was identified by gate security as the organizer of a rave of about 300 people on 7/8 June 2014 (see evidence of Insp. Hamill **JR38**] and supporting evidence of PS Miles [**R36**]).
  5. The Appellant admitted to Insp. Skinner that he was the organiser of the rave on 7/8 June 2014 [**R41**].
  6. The Appellant admitted to Insp. Skinner that he was the organiser of the rave organised and prevented on 19 July 2014 [**R39, R41**].
  7. The Appellant admitted to PC Edgoose that he lent his sound equipment for use at raves and that he could get a significant number of people to turn out for a rave [**R48, R88**]; and
  8. The Appellant was the organiser of the rave on 9 August 2014 and provided the sound equipment as well as laughing gas [**R42, R44-5, R47**]. When a crowd turned up and tried to force entry, the Appellant encouraged them to break the police line [**R43, R45-6**].
- (13) The Respondent further relies on the information set out in the intelligence reports and the documents provided to the court in the Respondent's bundle. The evidences show the Appellant has witnessed by many different police officers supplying equipment for or helping to organise a rave.
- (14) The court will be invited to reject the Appellant's account as t:o his activities on the relevant, days as not credible.

The second limb of the test under section 1 of the Act

- (15) It is first submitted that an ASBO is, in general terms, necessary.

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## 92.

### Simon Cordell's Skeleton Argument (2) Pdf

Simon Cordell Skeleton Argument.pdf

- (16) There is a significant body of evidence showing the impact of raves on people who live near where they occur [**R51-66, R155-298**]. The level of distress that these individuals suffered as a result of the raves organised by the Appellant was high. 'There is a need to prevent these events occurring in the future.
- (17) The ASBO (and interim ASBO beforehand) have been effective. **The only time where the Appellant's behaviour has improved is when these proceedings were commenced,** and it was made clear to the Appellant that his actions could not be tolerated.
- (18) "The Appellant has denied the acts alleged by the Respondent. He has shown no acknowledgment or desire to change his ways that might make an ASBO unnecessary.
- (19) **As to the particular prohibitions on the ASBO, significant effort was made by the Respondent and by the court to ensure that any legitimate business activities that the Appellant wished to undertake would in no way be inhibited by this order.** For the Appellant to provide recorded music to a gathering of people he would either need to have a licence for that event or to provide the music on a licensed premises for fewer than 500 people with, a general licence to play recorded music (see s. 1 and Sch.1 of the Licensing Act 2003). This order specifically does not preclude him from providing regulated entertainment under the auspices of a valid licence.
- (20) The only amendment that the Respondent would seek is that the words "or s.63(1. A)" be added after the words "s.63(1)" in prohibitions a, b, and c of the ASBO.
- (21) It is submitted that the terms of the ASBO as drafted are necessary and proportionate in that **they should have minimal impact on the Appellant's life and legitimate business activities.**

**ROBERT TALALAY**