

**See last page for MY COMMENTS**  
(Green boxes and yellow highlights are all subsequent additions)

BETWEEN

[NOËLLE KLOSTERKOTTER-DIT-RAWÉ](#)

Claimant

and

[COMMISSIONER OF POLICE OF THE  
METROPOLIS](#)

First Defendant

[INDEPENDENT POLICE COMPLAINTS  
COMMISSION](#)

Second Defendant

[SECRETARY OF STATE FOR THE HOME  
DEPARTMENT](#)

Third Defendant

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CLAIMANT'S REPLY TO FIRST DEFENDANT'S [DEFENCE](#)

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Introduction

The First Defendant's 23<sup>rd</sup> May 2011 Defence was posted to the Claimant on [1<sup>st</sup> June 2011](#). The deadline for service was [24<sup>th</sup> May 2011](#).

[Paragraph 4\(i\) and 4\(ii\)](#)

1. From paragraphs 4(i) and 4(ii), the Claimant replies exclusively to the following, as quoted: 4(i) the Defendant choosing to address "[section 1.1.7 \(Protection from Harassment Act 1997\)](#)" v. 4(ii) the Defendant concluding that it "*need not and does not respond to*", "[1.1.6 \(Malicious Communications Act 1988\)](#)" on the grounds that "[this] statute do[es] not give rise to [a] cause of action which can be brought against the MPS under Part 7 CPR".

**Dictionary definition of 'investigate':**  
*"carry out a systematic or formal inquiry into (an incident or allegation) so as to establish the truth"*

The Claimant will rely on the conclusion that the Defendant's "*preferences*" (plagiarising from paragraph 13 of the [Defence](#)) are driven, firstly, by the desire to exclude contradicting evidence as contained (among others) in the 3<sup>rd</sup> and 4<sup>th</sup> sentence of paragraph 9: "*As part of its investigations, the [MPS' TDC Dowling](#) made inquiries of the Claimant's website host. He indicated the nature of the allegations **he was investigating**, but did not suggest that the Claimant was guilty of the alleged conduct*". In particular, under [section 1.1.6 – Malicious Communications Act 1998](#) of the [Particulars of Claim](#), paragraph 97:

- (1) Subparagraph a: under which the Claimant wrote, in relation to TDC Dowling's e-mail of [16th March 2007](#) to her website Host: *"in which he falsely accused the Claimant of having 'anti-Semitic comments' on her website, and by stating "I am the police officer dealing with this crime", S Dowling's intention was clearly to scare the Host into meeting his demand: the immediate closure of the Claimant's website"*
  - (2) Subparagraph b: the fact that, following being challenged by the Claimant's website Host on his accusations in his 16<sup>th</sup> March 2007 e-mail, in his follow-up e-mail of [20<sup>th</sup> March 2007](#) TDC Dowling backed down on his accusations, while nonetheless still trying to scare the Claimant's website Host – as the Claimant wrote under this subparagraph: *"by asking "Could you let me know who deals with any complaints about websites in the US and I'll pass this on to the victim"*.
3. Secondly, the Claimant will rely on the conclusion that the Defendant's "preferences" are also driven by the objective of protecting other parties. She refers in particular to the content of paragraph 98 in the [Particulars of Claim](#).

#### [Paragraph 4\(iv\)](#)

4. The penultimate sentence of paragraph 4(iv) states: *"The Claimant puts forward no basis for her contention as to "the balance of probabilities"*. In support of her statement the Claimant will rely on the following facts and matters, namely her letters to the First Defendant (referred to in her [Particulars of Claim](#) and [Pre-action letter](#)), and subsequent events:
- (1) [28<sup>th</sup> November 2009](#) letter (Exhibit 1) in which the Claimant provided an overview of her experience with the First Defendant's officers at [Kensington, Chelsea and Notting police in 2002, 2003, 2007](#). She also reported her experience following her [28th May 2009](#) Subject Access Request to the police, by quoting extracts from the subsequent exchange of correspondence with the First Defendant's officers and other personnel. This includes extracts from her [20<sup>th</sup> September 2009](#) letter to the First Defendant's officer, [Chief Superintendent Mark Heath](#) (Exhibit 2), headed *"Kensington & Chelsea Police is not exempt from compliance with the requirements of the [Data Protection Act 1998](#)"*. In this letter, stating, *"In light of events"*, she asked 14 questions relating to his officers evidently perceiving themselves as having the right to breach a number of the Claimant's statutory rights. She concluded her letter with: *"As the above are very clearly in breach of, among others, the [Police Professional Standards](#), as Head of K&C police: what are you going to do in the face of this litany of outrageous, gross misconduct?"*. The Claimant provided a copy of this letter as part of her 11 supporting enclosures to her 28<sup>th</sup> November 2009 letter.
  - (2) [2<sup>nd</sup> December 2009](#) letter, the Claimant headed *"Head of Kensington Police approves of illegal conduct by some of its officers"* (Exhibit 3). In this letter, the Claimant captured

the content of the [20<sup>th</sup> November 2009](#) letter from the First Defendant's officer, [Acting Chief Inspector Steve McSorley, Professional Standards, Kensington Police](#) (as referred to under paragraph 16 of the [Particulars of Claim](#)) - and drew 21 conclusions on the implications, heading the list with *"It follows from this that [Chief Superintendent and Borough Commander for Kensington & Chelsea police, Mark Heath](#), approves of his officers..."*. The following are extracts from the Claimant's 21 conclusions included in the letter. In the letter, she supported her conclusions with examples.

1. *"...NOT contacting me – AT ANY POINT IN TIME – in relation to the [2007 so-called 'complaint'](#) against me 'by [Andrew Ladsky](#)' – giving them free rein to communicate unlawful, fabricated lies against me to third parties, as well as record them on the police systems"*
2. *"...defaming my name, character and reputation to a third party by making – totally unsupported - unlawful, libellous and malicious accusations against me to my website Host – with the aim of scaring my website Host into closing down my website, by: (1) [TDC Simon J Dowling](#) claiming in his [16 March 2007](#) email to my website Host that I had 'committed a crime': "I am the police officer dealing with this crime"; (2) stating that I have used "racially abusive terms towards Jewish people from the Nazi's"; (3) claiming that "This is directed at a particular person"*
3. *"...making unlawful, racist, xenophobic comments by branding me "a Nazi"...and therefore approves of his officers breaching the police code that "MPS personnel must not use MPS systems to author, transmit...documents such as electronic mail...containing racist,...defamatory, offensive,...material"*
4. *"...recording on the police systems expressions of opinion about my mental health that are malicious, scurrilous and libellous..."She is obviously extremely paranoid"; "I believe she may have some mental issues so will be speaking to social services to see if they are aware of her"*
5. *"..."fully recording" [Andrew Ladsky's](#) so-called 'complaint' against me [in 2003](#) as "SUBSTANT/Offence of harassment" - BEFORE even contacting me"*
6. *"...threatening me on the say-so of [Andrew Ladsky](#) e.g. [27 January 2003](#) letter - which was the first form of contact by [K&C police](#) following [Ladsky's](#) so-called 'complaint..."*
7. *"...bullying me and intimidating me into dropping my 2002 complaint, as well as telling me "You won't be able to prove a link with [Andrew Ladsky](#)"..."*
8. *"...repeatedly processing data that gives an inaccurate description of [Andrew Ladsky's role in Jefferson House](#)...– with the aim of giving him scope to play the 'poor*

innocent victim', as well as give some weight to his trumped-up, malicious and slanderous accusations against me”

9. “...totally failing to challenge Ladsky on the veracity of his accusations against me, including failing to obtain supporting evidence - as it would discredit his complaints against me”

10. “...totally failing to probe, and therefore failing to record the context of situations/ surrounding events - as it would discredit Ladsky's complaints against me...”

11. “...recording on the police systems – totally unsupported, unlawful, libellous and malicious accusations against me – many of which I only discovered as a result of making the [28 May 2009 Subject Access Request](#)...”

12. “...failing to record correspondence – because ‘inconvenient’ to Ladsky / his officers, and / or in order to disparage me / discredit me / lessen my complaint...”

13. “...recycling false accusations against me from Ladsky's [2003 ‘complaint’](#) in order to add weight to his equally false accusations in ‘his’ [2007 ‘complaint’](#)...”

14. “...failing to record the content of correspondence, as well as failing to act on it – because ‘inconvenient’...”

15. “...lying; knowingly record false data; telling me / writing one thing to me, and capturing something totally different in the police database – with the aim of covering-up events / avoid capturing ‘inconvenient’ data / disparaging me and discrediting me...”

16. “...repeatedly ignoring the evidence, and fabricate stories upon stories to avoid revealing it – with the aim of clearing Ladsky of involvement...”

17. “...failing to record the content of verbal communication from the police to me – because ‘inconvenient’ to his officers / Ladsky's ‘complaint’...”

18. “...failing to acknowledge that [at least four of my fellow leaseholders](#) at [Jefferson House](#) also complained to [K&C police](#) of suffering harassment from Andrew Ladsky – thereby lessening my complaint against him”

19. “...– who claimed to have ‘looked’ at my website - turning a blind eye to the ‘mountain’ of overwhelming ‘black on white’ evidence of [breaches of numerous Acts](#), that are punishable by imprisonment...”

20. “...breaching my rights under the [Data Protection Act 1998](#)...[by failing] to ensure that data held about me is accurate, lawful and fair – and thereby approves of his officers...caus[ing] me damage and distress;... [denying me the right] to ensure that fair processing requirements have been complied with...””

-[Elderly Resident](#)  
-[Residents Asso.](#)  
-[Other Residents](#)  
-[Resident k](#)  
...and as revealed in the [MPS' 22.07.11 version of the 2002 ‘crime report’](#):  
[18/02/2002-18h53](#);  
[26/03/2002-13h23](#).  
- My [29.08.11](#) Supp. Witness Statement

21. "...breaching my rights under the [Human Rights Act 1998](#)"

The Claimant concluded with: "In a nutshell: Mark Heath approves of his officers providing assistance to [a crook](#) in shutting-up his victim - by whatever means"

- (3) The First Defendant's Office replied on [3<sup>rd</sup> December 2009](#) that the Directorate of Professional Standards (DPS) had been contacted. This was followed by an [8<sup>th</sup> December 2009](#) letter from the DPS (Exhibit 4) that it was "identifying the most appropriate person to deal with the issue(s) you have raised. We will then send you the contact details of the person dealing with your complaint". Demonstrating contempt of the Claimant, the letter was posted one week later.
- (4) As by early February 2010 DPS had failed to contact the Claimant, she sent the First Defendant a [2<sup>nd</sup> February 2010](#) letter (Exhibit 5) headed "When am I due to be killed?" (referring to **the death threat** she had mentioned on page 8, line 11 of her [28<sup>th</sup> November 2009](#) letter, and in relation to which the police failed to take action).

My Diary 15  
June 2009

5. The Claimant will rely on her belief that any fair minded, reasonable, honest person would, as she did, conclude from subsequent events that the First Defendant failed to take action following her (above) detailed correspondence – thereby demonstrating endorsement of the conduct of his officers, as well as confirming their evident carte blanche to continue with this and other similar treatment of the Claimant. Among others, the Claimant will rely on: (i) the failure to even acknowledge her [2<sup>nd</sup> June 2010 s.10 Notice](#) – pursuant to section 10(3)(b) of the [Data Protection Act 1998](#); (ii) her experience with [Kensington and Chelsea police](#) in [October 2010](#) (see below, her reply to paragraph 40). (There have been other events since).
6. The Claimant will also rely on the outcome of the First Defendant's officers' failure to take action in [October 2010](#): (i) in relation to the Claimant's report against the '[30<sup>th</sup> June 2010 man](#)' (Exhibit 11): it has since led him to feel free to continue following and harassing the Claimant (e.g. [21 and 22 May 2011](#)); (ii) in relation to **Andrew David Ladsky: he has continued to have the Claimant followed and harassed** including, like e.g. the '[30<sup>th</sup> June 2010 man](#)', making it abundantly clear to the Claimant that she is being monitored.

Snapshot in  
My Diary 23  
May 2010

#### [Paragraph 9](#)

7. Specifically in relation to the first 2 sentences of paragraph 9, the Claimant will draw attention to the fact that the [2003 'complaint'](#) did not refer to her website: (i) in his [27<sup>th</sup> January 2003](#) letter to the Claimant, [PC Neil Watson \(206BS\) of Chelsea Police](#), who described himself as a "Crime Investigator", wrote: "The police have been informed by a Mr Andrew Ladsky that you verbally abused him in public over some sort of dispute revolving around your premises"; (ii) the **Claimant first launched her website in [September 2006](#)**.

IN SPITE of my writing this, the MPS repeated the same FALSE assertion under para.11 of its [30.06.11 Application](#) – as I pointed out under para.28 of my [19.07.11 Wit. Stat.](#) **Reason:** to cover-up the fact that its processing of the [2003 so-called "crime report"](#) was **totally unjustified** (it then added **lies** to make it stick). As I wrote under para.31 of [my Wit. Stat.](#): "I laughed when visualising the scene: ADL [Ladsky] standing in a police station saying: 'Mr Policeman, a woman swore at me', and at the First Defendant for having no sense of the ridicule".

[Paragraph 16](#)

8. Specifically in relation to the latter part of paragraph 16: "...because conditions 1...from Schedule 2 were met" – the Claimant will rely on the fact that she did not "give her consent to the processing" of the data.

[Paragraph 34\(iv\)](#)

9. In relation to paragraph 34(iv), the Claimant will rely (among others) on her below response to paragraph 40.

[Paragraph 40](#)

10. In relation to paragraph 40, specifically: "[PC Giles](#) did not accuse the Claimant of "following the man". "She...did not state that this would be filed as an "intelligence report", the Claimant will rely on the implications of these assertions: (i) that the Claimant is a liar; (ii) given the context, that the Claimant perceives herself to be at liberty to commit Contempt of Court by endorsing her assertions with a Statement of Truth. In support of her assertions under paragraph 117 of her [Particulars of Claim](#), the Claimant will rely on the irrebuttable evidence attached to this Reply that she stated the truth:

- (1) Exhibit 6 – Claimant's [transcript of her recording](#) (Exhibit 7) of the conversation she had with [PC Belky Giles \(125BS\) at Chelsea Police station](#), on [16<sup>th</sup> October 2010](#), from c.19h40 onwards – and will draw attention to:

- i. Page 2, line 2: 'PC Giles: "*But what you must appreciate is you followed him as well*"
- ii. Page 4, lines 9 and 10: 'PC Giles: "*Listen. On the information that you've given me it was not sufficient enough for a crime report to be put on. That's why an intelligence report was put on*"
- iii. Page 5, line 2: contained in Exhibit 8, [1<sup>st</sup> Note – stating "CRIMINT REPORT BSRT00327225"](#)

- (2) The Claimant will also rely on the fact that she also quoted, verbatim, the same comments from PC Giles in her [17<sup>th</sup> March 2011](#) Pre-action letter, on page 19, lines 17-19. Further, that she also addressed her said 17<sup>th</sup> March 2011 correspondence to the First Defendant's officer, [Chief Superintendent Mark Heath, Kensington police](#).

11. As to PC Giles' comment on page 4, lines 9 and 10 of the Claimant's [transcript](#): "*On the information that you've given me it was not sufficient enough for a crime report to be put on*" – the Claimant will draw attention to Exhibits 9, 10 and 11 which are the "*complaint*" / "*crime reports*" she submitted to Chelsea police on [4<sup>th</sup>](#) and [8<sup>th</sup> October 2010](#). (These reports are mentioned in the [Particulars of Claim](#) under paragraphs 115 and 118. They are also mentioned in the Claimant's Pre-action letter of [17<sup>th</sup> March 2011](#), on page 19, lines 13-16 and 20-22).

12. As further evidence that the Claimant stated the truth in her [Particulars of Claim](#), she will also draw attention to what she captured under paragraph 121, v. the [transcript](#) contained in Exhibit 6.

**A VAIN HOPE** – see my comments attached to [the FULL OF LIES 09.08.11 Order](#) 'from' [Master Eyre](#)

13. The Claimant **will request the Court** to record the First Defendant's Contempt of Court – pursuant to [CPR Rule 32.14](#).

14. Early part of paragraph 40 "...[Sgt. Avison](#) explained to the Claimant that the **MPS was not required to record all information provided by the Claimant concerning Mr Ladsky**". The Claimant will assert that Sgt. Avison did not state this. In the same way that the Claimant reproduced verbatim what PC Giles had actually told her on [16<sup>th</sup> October 2010](#), the Claimant will re-assert that what she captured under paragraph 125b of her [Particulars of Claim](#) is a verbatim quote of what Sgt. Avison actually told her – instead of what is claimed above.

While not true, it demonstrates further the MPS' blind determination to hold no damaging evidence against Ladsky

15. In further support of her claim of discrimination by the First Defendants' officers, the Claimant will also (among others) highlight that throughout her 7 visits to [Kensington and Chelsea police](#) in [October 2010](#), she wore, over her coat, a [T-shirt](#) stating, in large lettering "*Victim of Fraud and Corruption* – [www.leasehold-outrage.com](#)"

#### Paragraph 41

16. In relation to paragraph 41, specifically: "*her allegations against Mr Ladsky in [October 2010](#)*" the Claimant will rely on the fact that in her report to Chelsea Police, dated [8<sup>th</sup> October 2010](#) (Exhibit 11), she states "*the person/s who has/have asked him to do this, I am sure include Andrew David Ladsky*". In other words, the Claimant holds the view that another/other party/ies is/are involved. She will state her assumption, **based on numerous events**, that the '[30<sup>th</sup> June 2010](#)' man is a police informant.

-My [19.07.11 Wit. Stat.](#) to the [Home Office](#)  
- [Snapshot in My Diary 23 May 2010](#)

17. In [its Defence](#), the First Defendant has not addressed paragraph 9 – '2007 report' in the [Particulars of Claim](#).

18. Except as stated above, and except where it contains admissions, the Claimant requires the Defendant to prove the matters set out in the Defence.

#### STATEMENT OF TRUTH

I believe that the facts stated in this Reply are true.

.....

Noëlle Yvonne Sylvie Klosterkotter-Dit-Rawé

Date: .....

#### Supporting documents

This Reply is supported by 11 Exhibits, preceded by a list of these exhibits.

**LIST OF 11 EXHIBITS TO CLAIMANT'S REPLY OF 14<sup>th</sup> JUNE 2011 TO THE FIRST DEFENDANT'S DEFENCE**

**Exhibit Description**

1. Claimant's letter of [28<sup>th</sup> November 2009](#) to the First Defendant
2. Claimant's letter of [20<sup>th</sup> September 2009](#) to Chief Superintendent Mark Heath, Kensington Police
3. Claimant's letter of [2<sup>nd</sup> December 2009](#) to the First Defendant
4. [8<sup>th</sup> December 2009](#) letter from the Directorate of Professional Standards to the Claimant
5. Pages 1-5 and 17-19 of Claimant's letter of [2<sup>nd</sup> February 2010](#) to the First Defendant
6. Claimant's [transcript](#) of her recording of the conversation she had with PC Belky Giles (125BS) at Chelsea Police station on [16<sup>th</sup> October 2010](#).
7. CD-ROM of Claimant's recording of the conversation she had with PC Belky Giles at Chelsea Police station on 16<sup>th</sup> October 2010 from c.19h40.
8. [PDF of 2 Notes](#) on paper headed 'Book 125 - Metropolitan Police Service – Memo' written by PC Giles on 16<sup>th</sup> October 2010 – stating:  
1<sup>ST</sup> Note:
  - *"CRIMINT REPORT. BSRT00327225"; "PC Giles (125BS)"; "Sergeant Allen (PS17BS)"; "Inspector Griffiths"*2<sup>nd</sup> Note
  - *"PC Belky Giles"; "Tel: 0300 123 1212"; "1 PM →"*
9. Claimant's initial report, dated [4<sup>th</sup> October 2010](#), relating to the man who followed her on [20<sup>th</sup> and 27<sup>th</sup> July 2010](#). Report handed by the Claimant to PC Giles on 4<sup>th</sup> October 2010.
10. Claimant's report, dated [8<sup>th</sup> October 2010](#), relating to the man who followed her on 20<sup>th</sup> and 27<sup>th</sup> July 2010; re-submitted to Chelsea police (to PC Paul Pennial) on 8<sup>th</sup> October 2010, for the attention of PC Giles.  
Difference with the above 4<sup>th</sup> October 2010 report (Exhibit 9): change of *"Complaint of racially aggravated harassment"* to *"Crime report of racially aggravated harassment"*
11. Claimant's report, dated [8<sup>th</sup> October 2010](#), relating to the man who followed her on (among occasions) [30<sup>th</sup> June 2010](#). Submitted to PC Paul Pennial, Chelsea police, on 8<sup>th</sup> October 2010, for the attention of PC Giles.

Claims Administration Office  
[Queen's Bench Division](#)  
Royal Courts of Justice  
Strand  
London WC2 2LL

[Ms N Klosterkotter-Dit-Rawé](#)

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(By '*Special Delivery*')

[Ref: Claim HQ11X01471](#) - Noëlle Klosterkotter-Dit-Rawé v. Commissioner of Police of the Metropolis;  
(2) The Independent Police Complaints Commission; (3) The Secretary of State for the Home  
Department

14<sup>th</sup> June 2011

Dear Madam / Sir,

**Claimant's Reply to the [First Defendant's Defence](#)**

Please find enclosed my 14<sup>th</sup> June 2011 Reply to the First Defendant's Defence, as well as 11 supporting exhibits.

(By the same post, I am copying all 3 Defendants on this reply).

Yours faithfully,

N Klosterkotter-Dit-Rawé

Ms Jennifer O'Dwyer  
Lawyer  
Directorate of Legal Services  
[New Scotland Yard](#)  
Broadway  
London SW1H 0BG

[Ms N Klosterkotter-Dit-Rawé](#)

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(By 'Special Delivery')

[Ref: Claim HQ11X01471](#) - Noëlle Klosterkotter-Dit-Rawé v. Commissioner of Police of the Metropolis;  
(2) The Independent Police Complaints Commission; (3) The Secretary of State for the Home  
Department

14<sup>th</sup> June 2011

Dear Madam,

**My Reply to [your Defence](#)**

Please find enclosed my 14<sup>th</sup> June 2011 Reply to your Defence, dated 23<sup>rd</sup> May 2011; [posted on 2<sup>nd</sup> June 2011](#), and of which I took delivery on 3<sup>rd</sup> June 2011. Also enclosed are 11 supporting exhibits.

In case you are not aware, the Allocation Hearing has been re-scheduled to Thursday 28<sup>th</sup> July 2011 at 12h00. (This was done at the request of Helen John, Treasury Solicitors Department. When I met with Ms John, I agreed with her that when she contacted the other Defendants, she did not need to copy me – unless the Court had issued her with a revised Notice of the hearing).

Yours sincerely,

N Klosterkotter-Dit-Rawé

Mrs / Ms Julia Chittenden  
Lawyer  
[Independent Police Complaints Commission](#)  
90 High Holborn  
London WC1V 6bH

[Ms N Klosterkotter-Dit-Rawé](#)  
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(By 'Special Delivery')

[Ref: Claim HQ11X01471](#) - Noëlle Klosterkotter-Dit-Rawé v. Commissioner of Police of the Metropolis;  
(2) The Independent Police Complaints Commission; (3) The Secretary of State for the Home  
Department

14<sup>th</sup> June 2011

Dear Madam,

- 1. Your Application Notice dated [7<sup>th</sup> June 2011](#)**
- 2. My Reply to the First Defendant's [Defence](#)**

I acknowledge receipt of your 'recorded delivery' letter dated 8<sup>th</sup> June 2011, posted on 9<sup>th</sup> June, of which I took delivery on 12<sup>th</sup> June. The enclosures include: (i) an Application Notice; (ii) a Witness Statement, dated 7<sup>th</sup> June 2011; (iii) a Draft Order, as well as various supporting documents.

I note that you have "*asked the Court to list this application either in advance of the allocation hearing or at the allocation hearing in order to save time and costs*". In case you are not aware, the Allocation Hearing has been re-scheduled to Thursday 28<sup>th</sup> July 2011 at 12h00. (This was done at the request of Helen John, Treasury Solicitors Department. When I met with Ms John, I agreed with her that when she contacted the other Defendants, she did not need to copy me – unless the Court had issued her with a revised Notice of the hearing).

I also note that, in relation to this case, you have now taken over from Ms Asad.

Please find enclosed my 14<sup>th</sup> June 2011 Reply to the First Defendant's Defence, as well as 11 supporting exhibits.

Yours sincerely,

N Klosterkotter-Dit-Rawé

Mrs / Ms Helen John  
Treasury Solicitors Department  
One Kemble Street  
London WC2B 4TS

(Home Office)

[Ms N Klosterkotter-Dit-Rawé](#)

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(By *'Special Delivery'*)

[Ref: Claim HQ11X01471](#) - Noëlle Klosterkotter-Dit-Rawé v. Commissioner of Police of the Metropolis;  
(2) The Independent Police Complaints Commission; (3) The Secretary of State for the Home  
Department

14<sup>th</sup> June 2011

Dear Madam,

**My Reply to the First Defendant's [Defence](#)**

Please find enclosed my 14<sup>th</sup> June 2011 Reply to the First Defendant's Defence, as well as 11  
supporting exhibits.

Yours sincerely,

N Klosterkotter-Dit-Rawé

14 June 11 Reply to MPS Defence (1st Defendant)

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www.postoffice.co.uk/banking

www.postoffice.co.uk/banking

www.postoffice.co.uk/banking

This is not a VAT receipt

Post Office Ltd.  
 Your Receipt FAD: 054011  
 Lower Regent Street  
 11 Lower Regent Street  
 London  
 Greater London  
 SW1Y 4LR

UAT REF No: 6B 243 1700 02  
 Date of Issue: 14/06/2011 16:39  
 SESSION: 5-209353

AS SD 1019-500g	0.00	0.00
SD 101-500 gms	5.90	5.90
AS SD 1019-500g	0.00	0.00
SD 101-500 gms	5.90	5.90
AS SD 1019-500g	0.00	0.00
SD 101-500 gms	5.90	5.90
AS SD 1019-500g	0.00	0.00
SD 101-500 gms	5.90	5.90
AS SD 1019-500g	0.00	0.00
SD 101-500 gms	5.90	5.90
TOTAL DUE TO POST OFFICE	23.60	X
Cash	40.00	
Cash	16.40	
FROM CUSTOMER		
TO CUSTOMER		
BALANCE	0.00	

Please retain for future reference

Thank You

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Please enter your 13 character reference  
e.g. AA000100019GB

ZW821935924GB

Track item

How to find your reference number



Court

Your item with reference ZW821935924GB was delivered from our WEST CENTRAL LONDON Delivery Office on 15/06/11.  
Thank you for using this service.  
We can confirm that this item was delivered before the guaranteed time.  
The electronic Proof of Delivery may not be available for this item yet. Please allow up to 72 hours after delivery before checking.

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MPS

Your item with reference **ZW821936235GB** was delivered from our SOUTH WEST LONDON Delivery Office on 15/06/11.  
Thank you for using this service.  
We can confirm that this item was delivered before the guaranteed time.  
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Please enter your 13 character reference  
e.g. AA000100019GB

ZW821936227GB

Track item

[How to find your reference number](#)



Your item with reference **ZW821936227GB** was delivered from our WEST CENTRAL LONDON

Delivery Office on 15/06/11

Thank you for using this service.

We can confirm that this item was delivered before the guaranteed time.

The electronic Proof of Delivery may not be available for this item yet. Please allow up to 72 hours after delivery before checking.

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Please enter your 13 character reference  
e.g. AA000100019GB

ZW821936244GB

Track item

How to find your reference number

HO



Your item with reference **ZW821936244GB** was delivered from our WEST CENTRAL LONDON Delivery Office on 15/06/11. Thank you for using this service. We can confirm that this item was delivered before the guaranteed time. The electronic Proof of Delivery may not be available for this item yet. Please allow up to 72 hours after delivery before checking.

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**Noëlle Klosterkötter-Dit-Rawé COMMENTS to her 14.06.11 Reply to the [Metropolitan Police Service's 23.05.11 Defence to her 19.04.11 Queen's Bench Division Claim](#)**

**IN SPITE** of the irrefutable evidence I provided in support of my assertions in my document, **the Judiciary ignored everything, and continued to do so** in relation to: (i) my **19.07.11 Witness Statement** in response to the MPS' [30.06.11](#) Application to have [my Claim](#) struck out; (ii) what I raised during the [29.07.11](#) Application 'hearing'...

...– as evidenced by '[Master Eyre's FULL OF LIES 09.08.11 MPS Order](#)' (see my Comments attached to the Order).

I filed a [30.08.11 Appeal Application against the 09.08.11 Order](#) – supported by:

1. [29.08.11](#) Skeleton Argument in which, in support of my claims of breaches / violations of my rights, I referred to legislation and case law <sup>(1)</sup>;
2. [29.08.11](#) Supplementary Witness Statement, as the MPS - with the absolute knowledge of Master Eyre - only supplied me with a *materially less redacted version* of the 3 "crime reports" on 22.07.11; hence, after I had filed and served my [19.07.11](#) Witness Statement (thereby placing me on an 'unequal footing' ([CPR Overriding Objective](#))). **The reason was glaringly obvious: the redacted text provides strong support to some of my key conclusions** – as discussed in my Supplementary Witness Statement.
3. [29.08.11](#) Chronology of events;
4. [29.08.11](#) bundle of documents – as supplied for the [29.07.11](#) Application 'hearing' (bar 2 additional documents - as noted in the index, and referred to in the [29.08.11](#) Supplementary Witness Statement).

**IN SPITE OF THIS COMBINED EVIDENCE** the [Metropolitan Police 'Service'](#) was able to add **2 more 'trophies'** to its collection as:

1. '[Justice Lang](#)' fully endorsed 'Eyre's Order: [06.10.11 Order](#);
2. IN SPITE of my [17.10.11](#) Request in which I – again - comprehensively discussed the evidence in support of my claims of breaches / violations of my rights – referring to legislation and case law and, this time, supplied extracts from legislation in an Appendix - '[Justice Mackay](#)' also dismissed my – legitimate – Appeal: [24.10.11 Order](#).

(See my comments attached to the Orders)

**I continued to expose some of the LIES** when I made the payments, following the costs Orders:

1. my [22.08.11](#) letter to [the MPS](#) - to pay [£8,478](#);
2. my [22.08.11](#) letter to the [Home Office](#) - to pay [£5,000](#);
3. my [13.09.11](#) letter to the so-called '[Independent](#)' [Police Complaints Commission \(IPCC\)](#) - to pay [£3,703](#). **I copied** the [Home Secretary](#) on this letter, stating she very clearly approved of the conduct of the Metropolitan Police and IPCC.

My assessment of the events? As stated in my Comments attached to the above Orders: **collusion and conniving between Masons = I submit: a CONTINUATION of what has been happening in my case since 2002** – [My Diary 2009 – Intro](#) (visual, 'Layers of protection for crooked landlords')

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<sup>1</sup> I could not do it in my Witness Statements e.g. [court's Notice](#)