

Issued in the context of my [30.08.11](#) Appeal against '[Master Eyre's FULL OF LIES MPS Order of 09.08.11](#)' (see my attached comments) because, **with his absolute knowledge, the police ONLY** supplied me with a *materially less redacted* version of the 3 "crime reports" on 22.07.11 - AFTER I had filed and served my [19.07.11](#) Witness Statement re. its [30.06.11](#) Application to have my [19.04.11](#) Claim struck out. The content of this Witness Statement clearly show that it placed me on an 'unequal footing' ([CPR Overriding Objective](#)), as the MPS' 22.07.11 version provides strong support to some of my key conclusions.

[The police](#) was able to add 2 more 'trophies' to its collection as: (i) '[Justice Lang](#)' endorsed 'Eyre's Order: [06.10.11](#) Order; (ii) IN SPITE of my [17.10.11](#) Request, '[Justice Mackay](#)' also dismissed my – legitimate – Appeal: [24.10.11](#) Order. (See my comments attached to the Orders)

(All other additions are also in green boxes)

Made by Appellant
Witness: [N Klosterkotter-Dit-Rawé](#)
Supplemental Witness Statement to
19th July 2011 Witness Statement
[Exhibits](#): B1:10-13
B3/T1/: 21-23
B3/T2: 24-26
B3/T3: 29, 30, 33, 38-40, 59
B3/T5: 64
B3/T6: 71-75, 79, 80, 88, 89
Dated 29th August 2011

IN THE HIGH COURT OF JUSTICE

Claim No HQ11X01471

APPEALS DIVISION

I continued to expose some of the LIES when I made the payments: (i) my [22.08.11](#) letter to the MPS to pay [£8,478](#); (ii) my [22.08.11](#) letter to the Home Office to pay [£5,000](#); (iii) my [13.09.11](#) letter to [the IPCC](#) to pay [£3,703](#) – letter on which I [copied](#) the [Home Secretary](#) stating she very clearly approved of the conduct of the [Metropolitan Police and IPCC](#)

BETWEEN:

NOËLLE KLOSTERKOTTER-DIT-RAWÉ

Appellant

- and -

COMMISSIONER OF POLICE OF THE METROPOLIS

Respondent

WITNESS STATEMENT OF [NOËLLE Y S KLOSTERKOTTER-DIT-RAWÉ](#) TO
SUPPLEMENT HER [19TH JULY 2011](#) WITNESS STATEMENT IN RESPONSE
TO THE FIRST DEFENDANTS' [30TH JUNE 2011](#) APPLICATION

1. I am Noëlle Y S Klosterkotter-Dit-Rawé, the Claimant, and Appellant in this action. I am a Litigant in Person, a pensioner, and leasehold owner of flat 3, [Jefferson House, 11 Basil Street, London SW3 1AX](#), where I reside.
2. With the Court's permission, the aim of this Witness Statement is to supplement my Witness Statement of [19th July 2011](#) in response to the Respondent's [30th June 2011](#) Application under [CPR 3.4\(2\) / 24.2](#). I refer to [B1/10 & 11/92-101](#). The reason being that I was only supplied with a less

- MPS' July 2009 version I had when I wrote my 19 Jul 11 Witness Statement: [2002](#); [2003](#); [2007](#)
- MPS' 22 Jul 11 version: [2002](#); [2003](#); [2007](#)

redacted version of the 3 "crime reports" on 22nd July 2011, I refer to [B3/T3/383-439](#) and some of the then blocked data add support to my position. The version I had at the time of writing my Witness Statement is under [B3/T1/284-382](#).

In this document I refer to my [19th July 2011](#) Witness Statement as: 'WS1'.

4. [2002 report](#)

5. Some of the text that was redacted provides additional support to my assertions under [WS1 § 24\(1\), 24\(2\)\(e\), 26\(3\)\(4\)\(5\)](#), I refer to [B1/13/107](#), that other residents reported suffering [harassment](#) from [Andrew David Ladsky](#) ('ADL') to [the Respondent](#), including receiving anonymous phone calls:

[Elderly Resident](#)
[Resident Association](#)
[Other Residents](#)
[Resident K](#)

(1) [18/02/2002-18h53 entry](#), I refer to [B3/T2/392](#): "1. Two other residents have suffered the same way [receiving anonymous phone calls] and it has been the suspect"; "7. The occupier of [Number 12](#) has spoken to [PS Emma Whitlock](#) about the suspect as he received phone calls";

(2) [26/03/02-13h23 entry](#), I refer to [B3/T2/399](#), "[Ms \[REDACTED\]](#) states she also had a run in with Ladsky"

(3) [08/04/02-14h32 entry](#), I refer to [B3/T2/402 & 404](#), "...PS Whitlock's spoke with the [\[REDACTED\]](#)'s who were making complaints against Mr Ladsky who was repeatedly complaining about the [\[REDACTED\]](#)'s behaviour".

6. In the light of this new information, in addition to the previously supplied: (i) threatening and bullying letter of 11th October 2001 to [Mr \[REDACTED\]](#), [flat 12](#), from [CKFT](#), I refer to [B3/T6/698](#); (ii) the unjustified [26th February 2002](#) Central London County Court claim by [Steel Services](#) against [Mr \[REDACTED\]](#), I refer to [B3/T5/673](#), to this I now add the following evidence as to what prompted harassment of [Mr \[REDACTED\]](#) by ADL:

(1) In October 2001, [Mr \[REDACTED\]](#) approached [Nucleus, local Citizen Advice Bureau](#), asking for assistance as we considered the service charges excessive. Nucleus received a bullying and threatening letter, dated [14th November 2001](#), from 'Steel Services'. I refer to [B3/T6/701](#). At the

time, Nucleus also reported to me and other leaseholders that it had received several threatening, anonymous phone calls, as well as other threatening phone calls 'from [Steel Services](#)' warning it to stop helping us.

- (2) Leaseholders abandoned the idea of appointing an arbitrator to investigate the service charges. [Mr \[X&X\]](#) received a [2nd January 2002](#) letter from '[Steel Services](#)' demanding payment of £881 for costs alleged to have been incurred by Steel Services. I refer to [B3/T6/706](#). In this letter, 'Steel Services' also complained of [Mr \[X&X\]](#)'s "cooking smells": [08/04/2002-14h32 entry, B3/T2/404](#).
7. The [Chronology of Events](#), I refer to [B1/13/145](#), demonstrates a correlation between my exerting my rights in challenging excessive service charges and suffering retribution in the form of, among others: [harassment](#) that included anonymous phone calls; threats of forfeiture and bankruptcy; fraudulent claims filed against me; reporting of false accusations against me and malicious opinions of me to [the police](#) and [my employer](#).
8. The above experience by [Mr \[X&X\]](#) and [Nucleus](#) demonstrate further that these are typical tactics used [by ADL](#) against leaseholders who 'dare' stand-up to him, obstruct his plans, and that he will also go as far as bullying and threatening outside parties prepared to help leaseholders.
9. It also demonstrates that making anonymous phone calls is one of ADL's standard tactics. His harassment of leaseholders by frequently phoning them can also be seen, for example, in the (previously supplied) e-mail of [18th April 2002](#), I refer to [B3/T6/704](#), sent to me by a leaseholder: "*Ladsky rang my phone in my flat constantly once I advised him I would vote re lease any which way I wanted [ADL's letter to leaseholders of [25th January 2001](#), I refer to [B3/T6/696](#)].... Then when I returned to the US he wasn't sure if I was still in Jeff House or where I was so he rang constantly to see if I would pick up both my office and home phones etc, even on Sunday mornings at 6am! Had to be him...*"

10. The [26/03/2002-13h23 entry](#), I refer to [B3/T2/399](#), provides additional support to my assessment, under [WS1 § 24\(2\)\(3\)\(4\)/107](#), that the Respondent's assertion that [the resident](#) was responsible for all the anonymous phone calls does not stack-up:

(1) it states that the resident "*attended BD and was interviewed under caution*" v.:

a. (i) the [26/03/02-13h42 entry](#), I refer to [B3/T2/400](#), i.e. 9 minutes later: "*Ms [X] is attending BD tomorrow to enable me to formally warn her*" (This is confirmed by the [27/03/02-22h52 entry](#), I refer to [B3/T2/400](#), which states: "*Ms [X] attended BD and was formally warned this afternoon*";

b. (ii) the officer telling me, on 25th March 2002, at c.14h00: "*We have interviewed Ms [X]*": I refer to my [2nd April 2002 letter](#): [B3/T3/445](#); [WS1 § 24\(2\)\(d\)/108](#);

(2) the 'story', under the [22/05/02-14h32 entry](#), I refer to [B3/T2/405 & 406](#), (which was blocked), on how [the resident](#) 'admitted' to also making the anonymous phone calls made from a landline: "*...I called Mrs [X] this evening...regarding these calls, she said she did not remember making them, despite my assurances that as she had already been warned regarding calls before and after these calls were logged that no further action would be taken and the matter could be cleared up to ensure Ms Rawé's peace of mind. A few minutes later Mrs [X] rang the office apologising profusely, she told me that my call out of the blue had overwhelmed her and that she could now remember making the calls on her way home one evening*". From this, one is expected to believe that [Mrs \[X\]](#) goes 'past the Carlton Tower hotel', which is c.150m from her flat, and thinks: Oh! Let me go in and make another 3 anonymous phones calls to "my friend" ("*the victim is a friend*", [20/03/02-13h51](#), I refer to [B3/T2/398](#)). I refer to [WS1 § 24\(4\)\(5\)/110](#).

11. [The Respondent](#) is aiming to block evidence in relation to the telephone numbers. In the version it supplied me with in July 2009, the [22/022/2002-](#)

[14h31 entry](#), I refer to [B3/T2/396](#), noted “two prolific numbers”: one mobile phone number, and a landline number. The latter is mine. I refer to [WS1 § 26\(2\)/112](#). The Respondent now wants to redact these numbers. It also wants to redact the following under the [22/05/2002-19h39 entry](#), I refer to [B3/T2/405](#): “[the line is held by] *Jumrah International of 2 Cadogan Place, SW1*”. This data confirms what I wrote under [WS1 § 24\(4\)\(5\), 25/110](#), and in the supporting document, which is my [31st May 2002](#) e-mail to the [Metropolitan Police Authority](#). I refer to [B3/T3/456](#).

12. These entries, added to: (i) the above; (ii) the Respondent's defensive attitude at the time of my complaint when I identified ADL as the perpetrator of the anonymous phone calls, including telling me: “*You won't be able to prove a link with Andrew Ladsky*”, I refer to [WS1 § 24\(2\)\(e\)\(g\)/109](#); (iii) the Respondent's comments in the report e.g. [20/03/2002-13h51 entry](#), I refer to [B3/T2/399](#), [WS1 § 25\(1\)/111](#), that I was not buying the story “*despite the evidence pointing to someone else*”; [26/03/2002-13h42](#), I refer to [B3/T2/400](#), [WS1 § 25\(2\)/111](#), that “*in this case there was absolutely no evidence to link Ladsky with this matter*” when, in fact, the issue of the 3 landline calls remained outstanding; and, under the same entry, that ADL “*has not been the subject in any CRIS reports*”, I refer to [WS1 § 26\(3\)\(5\)/112](#), when the report itself identifies other leaseholders as having complained to the Respondent - support my assertions of a cover-up by the Respondent to avoid revealing the subscriber of the Reach Europe number: ADL.
13. As to [the resident](#) being alleged to have also made the calls to me from a mobile number, I likewise reassert my conclusion that, if she did, it was at the behest of ADL: I refer to [WS1 § 24\(4\)/110](#).
14. As detailed in my [24th July 2011](#) letter to the Respondent, I refer to [B3/T3/657](#), several pages are missing from the version of the report supplied 22nd on [27th July 2011](#) relative to what I was sent [in July 2009](#). Of these I highlight ‘Classification’ which falsely states ‘Method’: “*By person unknown*”. I refer to [B3/T1/297](#) and [WS1 § 26\(1\)/112](#).
15. [2003 report](#)

16. In the [22nd July 2011 version](#), the 'Officer's Notes', on the 'Victim Details' page, I refer to [B3/T2/412](#), it states: "*The victim made a report on 03/01/03. The victim states that he only had a CAD number for this no crime reference number*". The Respondent wanted to block this out. Should I conclude that another complaint was filed with the Respondent, against me by ADL?
17. The [entry 25/01/03-13h55](#), I refer to [B3/T2/420](#), states:
 - (1) "...*The victim states that the reason why she is being like this is because she does not want to pay...*". This is a repeat of a false, defamatory accusation. There can be no reason for blocking this other than to prevent me from challenging it.
 - (2) "*The victim spoke to the [senior employer of the suspect's firm](#) re the accusations of theft and fraud...*". The [2009 version](#) of the report only showed that I "*wrote letters accusing the victim of theft*". I repeated my denial of this in [WS1 § 39/116](#). Hence, what was redacted was another false accusation that I accused ADL of "*fraud*". Evidence that this accusation is equally false can be seen in my: (i) [24th October 2002](#) fax to [Kensington & Chelsea housing](#), I refer to [B3/T6/711](#); (ii) my [24th October 2002](#) fax to the [London Leasehold Valuation Tribunal](#), I refer to [B3/T6/712](#). It is clear that this part of the entry was blocked to prevent me from challenging it.
18. As detailed in my [24th July 2011](#) letter to the Respondent, I refer to [B3/T3/657](#), several pages are missing from the version of the report supplied on [22nd July 2011](#) relative to what I was sent in [July 2009](#). Of these I highlight:
 - (1) 'Classification' which, among others, states under 'Main classification': "*Substantiated Offence of Harassment*"; 'Confirm?': "*Yes*" on "*25/01/2003*". I refer to [B3/T2/419](#); [WS1 § 7, 33 and 35/103 & 114](#);
 - (2) 'Suspect summary'; 'Suspect details'; 'Suspect elimination – Officer's Notes'. I refer to [B3/T1/329-334](#).
19. [2007 report](#)

20. The [15/03/07-16h14 entry](#), I refer to [B3/T2/434](#), states:
- (1) *"It is only recently that the victim has spent time examining the web site..."*. This is not true - as evidenced by, among others, the [3rd October 2006](#) fax from [ADL's solicitors, Portner and Jaskel](#), to my then website host, I refer to [B3/T6/738](#), covered in [WS1 under § 20\(4\)/106](#).
 - (2) *"The reason why the victim believes he has become a target for abuse on the web site is that the victim was involved with the business who was carrying out the repairs and improvements that were paid for with the service charge"*. This is another false, malicious accusation. It was blocked to prevent me from challenging it.
 - (3) Another part that [was blocked out](#) is in the [16/03/2007-18h56 entry](#), I refer to [B3/T3/437](#): *"About four years ago Mr Ladsky organised for refurbishment on the flats"* which contrasts significantly with the above implied role of being 'brought in' to carry out the works. Evidence that [ADL is the landlord](#) is further demonstrated in another part of this entry: that *"he organised for refurbishment on the flats"*. The 'story' that ADL was an outside party was concocted in order to substantiate the false accusation of my being 'a racist', an 'anti-Semite'.
 - (4) As with all the other malicious accusations, [the Respondent](#) failed to challenge ADL, including failing to ask him for documentary evidence in support of his claim. This provides another example of the intended trickery in describing ADL as my *"neighbour"*. I refer to [WS1 § 18-20/106](#). (In the [2003](#) and [2007](#) reports this description is used in reply to the question: 'How is the suspect known to the victim?', I refer to [B3/T2/411 & 428](#). The reason ADL *"knows"* me is because he is the [landlord](#). This is also clear from the [Chronology](#). I refer to [B1/13/245](#)).
21. The ['Primary Investigation Details: 4'](#), [B3/T2/435](#), states: *"The victim considers himself intimidated"*. Considering [what ADL has done](#), as well as [instigated against me since 2002](#) (and fellow leaseholders) through [his aides](#), this entry is hilarious. Clearly, it was blocked to prevent me from challenging

Under the
15/03/07:
16h14 entry

it: its aim is to add weight to the fictional story that 'poor Mr Ladsky' is an innocent victim.

22. [The Primary Investigation Details: 5](#), [B3/T2/435](#), states "*Suspect is alleged to be extremely paranoid and is said to sleep with a knife beside her bed*". Why was this blocked? Was it because [the Respondent](#) did not like the reason I gave on my website for doing this – which undermines its objective in capturing this? My reason for doing this is detailed in my [19th July 2011 Witness Statement](#) in response to the [Third Defendant's Application](#) at **§ 61**. I refer to [B2/16/217](#).

Under the 15/03/07: 16h14 entry = intended to, among other, further portray me as 'a threat' to 'poor Mr Ladsky'

23. The [Primary Investigation Details: 6](#), [B3/T2/435](#), states: "*No suspicion of false reporting*". In the light of the numerous false, malicious accusations and opinions of me in the report, it is abundantly clear why this entry was blocked. How can the Respondent make this categorical statement given that it never contacted me, the owner and author of the website - at any point in time? I refer to [WS1 § 49 and 58/119 & 121](#). It does provide irrefutable confirmation of the Respondent's blind determination to make this so-called "*crime report*" stick against me.

Under the 15/03/07: 16h14 entry

24. In the [16/03/2007-18h56, entry](#), I refer to [B3/T2/437](#), the [previously blocked-out text](#) revealed that ADL was the Respondent's source for claiming that I used the words 'pigs and monkeys' "*as used by the Nazi's to refer to Jewish people during the holocaust*", and that: "*Mr Ladsky is Jewish and believes this is what the suspect is referring to*". Without knowing the source, under [§ 71 of my WS1 Witness Statement](#), I refer to [B1/13/125](#), I asked why the Respondent had not asked me ("*and believes*"). This is another example of the Respondent accepting ADL's accusations at face value, without any challenge whatsoever.

25. The [entry 16/03/07-19h07](#), I refer to [B3/T2/438](#), states: "[Mr Ladsky] *states that Ms Rawé is Franco-German as is well aware he is Jewish*". Yet again, this [was blocked](#) to prevent me from challenging it. I did not know that ADL said to be Jewish until the Respondent's e-mails of [16th](#) and [20th March 2007](#) to my website Host. I refer to [B3/T3/462-465](#), and [WS1 § 49 & 52/119 &](#)

121. This entry is intended to add weight to the fictional story that I am an anti-Semite.
26. As detailed in my 24th July 2011 letter to the Respondent, I refer to B3/T3/657, several pages are missing from the version of the report supplied on 22nd July 2011 relative to what I was sent in July 2009. Of these I highlight:
- (1) 'Classification' which, among others, states under 'Main classification': "*Substantiated Racial Incident*"; 'Confirm?': "Yes" on "20/03/2007". It falsely accuses me of having "*anti-Semitic, anti-black, anti-Asian pictures and text*" on my website. I refer to B3/T2/433; WS1 § 68/25.
 - (2) 'Suspect summary'; 'Suspect details'; 'Suspect elimination – Officer's Notes'. I refer to B3/T1/360-365.

Statement of Truth

I believe that the facts stated in this Witness Statement are true.

.....

Noëlle Yvonne Sylvie Klosterkotter-Dit-Rawé

Date: