



ACUS Member Protection Services

Our Ref: BS-K/JRowe/MP4.jw
Your Ref: C17958806

11 June 2004

Metropolitan Police
Traffic Criminal Justice
Operational Command Unit
P O Box 510
London SW1V 2JP

Dear Sir

Re: Metropolitan Police - v - Mrs Johanna Rowe. R76 RSS. Notice of Intended Prosecution for Alleged Speeding.

We acknowledge receipt of your letter dated 9 June.

Significantly, your reply demonstrates that you are either unable, or unwilling, to provide the answers to the series of basic, straightforward, questions we put to you in our letter dated 1 June. Whatever the reason, this would appear to bring into serious question your ability to substantiate the allegation made against our member client, Mrs Johanna Rowe, in your Notice of Intended Prosecution.

Simply stating, in the absence of any authenticated supporting/substantiating evidence whatsoever, that ...*"the vehicle was caught on camera as travelling at 61 mph"*... on a stretch of the M25 where the speed limit is 40 mph, brings into serious question the credibility of the evidence you purport to have.

TAKE NOTE that, in the light of your stated intention to prosecute this matter - albeit you have not yet indicated to us which one of our four member clients you will be prosecuting - we will be acting for all four defendants and, accordingly, will require you to furnish us with copies of the supporting 'technical and photographic evidence' against them that you claim to have and upon which you intend to base your prosecution/s.

Finally, in compliance with your standard printed Reminder Notice of Intended Prosecution, we provide the respective names and address details of the THREE possible alternative drivers who had our client's authority to use the vehicle in her absence over the period in question, but who each deny being the driver at the time of the alleged offence. They are:

1. Mrs Jennifer Edwina King, 4 Tudor House, Heath Road, Weybridge, KT13 8TZ
2. Ms Bethany Jane King, 365 Jamaica Street, London E1 3HU;
3. Ms Jocelyne Louise King, 13 Park Road, Hampton Wick, Kingston-on-Thames
KT1 4AS;

361 West Barnes Lane, New Malden, Surrey KT3 6JF
Tel: 020 8949 6160 (s/b); Fax: 020 8336 0537; e-mail: chairman@acus.org.uk

each of whom has instructed us to act on their behalf. Accordingly, all and any communications to them in relation to this matter should be sent to the undersigned at the address given below.

In the meantime, having provided you with the information you require under Section 172 of the Road Traffic Act, we would ask that, if you have the ability and authority to do so - you now reciprocate by return with the answers and information requested, together with copies of the technical and photographic evidence you will be submitting to the Court.

In particular, we would appreciate confirmation as to which of the four individuals we have identified to you, you intend to prosecute: e.g. the absent Mrs Rowe, or alternatively, each of the four above-named either individually or jointly and severally (justifying to the Court, on the grounds that it must have been one of them), or just two of the four; etc?

Your prompt response, ***providing the answers/information requested above***, would be appreciated.

Yours sincerely
ACUS MEMBER
PROTECTION SERVICES

B STUART-KING
Legal Support Services

Direct Line: 020 8336 0586
Mobile: 07768 026458

Cc: Mrs Johanna Rowe
Mrs J E King
Ms Bethany King
Ms Jocelyne King