

**IN THE COUNTY COURT AT
CENTRAL LONDON**

CLAIM NO. L10CL472

BETWEEN:

**51 DRAYCOTT PLACE
FREEHOLD LIMITED**

Claimant

And

**TARQUIN MANAGEMENT
LIMITED**

Defendant

SECOND WITNESS STATEMENT OF JASON KALLIS

I, Jason Kallis, a solicitor with Merali Beedle, of Vicarage House, 58-60 Kensington Church Street, London W8 4DB, will say as follows:

- 1 I am instructed to make this witness statement on behalf of the Claimant (and its representatives) having acted for those in control of the Claimant company throughout the enfranchisement process. I make the statement from my own knowledge and experience, save where I indicate to the contrary. This statement is made in response to the application to set aside, made by the Defendant on 17 April 2025.
- 2 The court is referred to the full circumstances laid out in my first witness statement filed with the application for a vesting order. In short, this matter results from the Defendant

not signing a TR1 pursuant to an order to enfranchise, which has not been appealed. There are no known grounds to appeal out of time. It should be noted, and repeated, that the Defendant's controlling mind, Mario Angiolini, has made it his mission to create and cause the Claimant to incur as much cost as possible. During the LVT proceedings he repeatedly failed to turn up to meetings, instruct experts only to dismiss them prior to them delivering report but after an inspection (and after a final hearing had been listed), comply with directions or attend hearings. He attempted to file evidence of ill health twice which was rejected by the LVT (in essence, Mr Angiolini has the means and the capacity to have attended to the previously made Directions, as his ill health was not severe enough to prevent instructing representatives. He is a barrister by trade and a practicing accountant, but has in the past not just turned a blind eye to his own tenant's apparent drug dealing from the flat as per police interviews during one of the 2 police raids into Mr Angiolini's flat, leading to the arrest of Mr Angiolini's tenant (see my first witness statement), but confirmed he would not take action against that tenant, ever, as he supports the legalisation of all drugs, and therefore the trade in them). Mr Angiolini has been asked several times to sign a TR1 pursuant to the order compelling enfranchisement, and has ignored and refused to do so.

- 3 In terms of whether the application for a vesting order was served properly, it should be noted that (a) this is an originating application (b) Mr Angiolini often ignores emails until the last minute (as he has here) and (c) costs have risen to such a level that service by the court was deemed by the Claimants to not just be the most sensible way of effecting service, but also one which was least open to challenge.
- 4 The address for service was at all material times the address of the Defendant (see attached print out from Companies House, confirming that the address with then Claim Form (drafted several weeks before filing at court), it is also an address where to our knowledge Mr Angiolini resides when in England (we do not know whether he does so now), and indeed still owns (see pages 1-2 for an Office Copy Entry for that address). I would be very surprised if post was not picked up by or forwarded on to Mr Angiolini as a result. Further, this was the address that throughout this matter Mr Angiolini insisted that the representatives of the Claimants attend to inspect service charge documentation (refusing to send such documents by email, when doing so would have been easy – further illustrating his Modus Operandi, it is contended – and highlighting that the address has a real connection with the claim). Indeed, the Defendant sent a letter to the tenants (whom

double as part and equal share owners of the Claimant company) on letter headed paper quoting the 41 Albert Terrace address on the letter, as recently as February 2025 (see page 3-4). Furthermore, the new registered address (changed on the day of issue incidentally) is wrong (it claims to be an address at number “85 85 Pimlico Road”, London an address that does not exist – see extract from Companies House at page 5), so using that address for service may well have failed in any event, and no notice of the change of address was ever given to any of the tenants or the claimant, and so formally the old address still applies (and has the requisite connection to the Claim). In any event, as the court will know, service need only be effected on “*Principal office of the company; or any place of business of the company within the jurisdiction which has a real connection with the claim*”.

- 5 This matter was served by the court, on the correct address, whether it was received or not.
- 6 Yet further, dealing with the court on the vesting order was complicated by a failure by the court to inform this firm of the date for the hearing until 11 February, by post, just one day before the hearing on 12 February. We understand that this is short notice, but ultimately we notified the Defendant of the hearing as soon as we could (on 12 February, by filing a Trial Bundle on that day see page 6). It should be stated too, that despite sending this email we have only fairly recently received an objection to the order being made, and the delay in the application (over two months from the date on which the Trial bundle with the application and all the evidence, and a skeleton argument included) means that this application should fail for being too late. Delay of this nature, in the circumstances outlined here, and in my first witness statement, and the skeleton argument, should always lead to the application being dismissed. Moreover, it only serves to underscore that the Defendant would not have responded to service of the claim by email too.
- 7 We consider that the Defendant has no real prospect of defending the application for a vesting order, and in fact, save for ensuring that an appropriate order was made in respect of the premium for the transfer the order could and should have been made on paper in

any event. There are no other reasons that a vesting order should not be made either – the Defendant did not present a defence whether through a lawyer or in person, had ample opportunity to appeal, did not do so, and its controlling mind is a barrister. We stand by everything we have said about the good reasons for making the vesting order (the entire enfranchisement process was only ever entered into as Mr Angiolini , amongst many other failings as freeholder, did not fix a leaking roof, despite knowing it was needed for at least 7 years, has let his flat to a tenant that has been the subject of 2 police raids (with evidence of drug taking and dealing being logged, and as we understand it that has led to the tenant being held on remand, presumably after the police objected to bail – not something they would do lightly – it should be noted that this tenant is believed to still be in occupation of the property, and there is still evidence of drug taking (smell of marijuana emanating from the flat), Mr Angiolini can only be forced to take action if the transfer is made. Further, there is another newer leak from Mr Angiolini’s flat going into the flat 1 below, and he is not responding to requests for workmen to enter onto his premises to rectify the situation. Children and the wife of the owner of one of the owners that were living in the flat of one leaseholder in the Defendant company are no longer able to stay in the flat due to the presence of the tenant in Flat 2. This situation is both dire and urgent.

8 The only defence that Mr Angiolini appears to have to the above is that he believes the Defendant cannot prove that drug dealing is taking place, as to date there are no convictions. Of course this is irrelevant – the relevant position is that Mr Angiolini has not signed a TR1, nor appealed nor got leave to appeal the LVT decision.

9 The Defendant seeks an order, on paper, that the application be dismissed, along with the costs of filing this witness statement in the sum of £1750 plus VAT. It should be noted that the Mr Angiolini declared at the outset of the enfranchisement process over 2 years ago as follows:

“If... you still decide to go ahead [with the enfranchisement claim], it will become very personal and all three will gain a sworn enemy. Rationality and proportionality will not come into it and costs will be an irrelevance.”

He has stuck to that promise at every step of this matter.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed:

A handwritten signature in black ink, appearing to be 'JK', with a horizontal line underneath.

Jason Kallis

Dated: 15 May 2025

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**51 DRAYCOTT PLACE
FREEHOLD LIMITED**

Claimant

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**TARQUIN MANAGEMENT
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Defendant

EXHIBIT JK2

This is the exhibit referred to in the second witness statement of Jason Kallis as being marked Exhibit JK2

Signed



Jason Kallis

Dated: 15 May 2025