

Jason Kallis

From: Tarquin Management <tarquin.management@gmail.com>
Sent: 04 March 2025 14:03
To: Jason Kallis
Cc: Central London County, Enquiries
Subject: L010CL472 - URGENT PLEASE PLACE BEFORE A JUDGE ON RECEIPT -- 51 Draycott Place v Tarquin Management Ltd
Attachments: AD01 Change of Registered Office Address.pdf

Dear Central London County Court,

We have come across the email below from Mr Kallis to the Court dated 12 February 2025 only yesterday, as it had been filtered to our junk mail folder automatically,

We have no prior knowledge of the proceedings having been issued or notice of the hearing having been listed. Assuming a sealed order or decision has not been issued yet by the Court, we would respectfully ask informally at this stage that the Court refrain from sealing and issuing any order or finalising any decision arising from that hearing to give us a chance to seek urgent legal advice and revert to the Court in the shortest possible time for the following reasons.

1. Lack of Proper Service

The claim was not properly served, and as a result, we had no knowledge of the case having been commenced and never had a chance to respond to it. The claim form, issued on 14 June 2024, was incorrectly addressed to our previous registered office. We have not not retained any link with that address and would not have received any post sent there. We cannot confirm if this was ever received at that address and, if so, what may have happened to any such correspondence.

The company's change of address from earlier that week was filed with Companies House in the early morning of 13 June 2024 and published by them that same morning. This was before the claim was issued (see attached Companies House filing). The change was made for reasons entirely unrelated to this dispute.

It would have been incumbent on solicitors acting for the Claimants to check public records to ensure any claim was correctly addressed. It would appear they failed to do so at the time. It is not clear whether the Claimants' solicitors informed the Court subsequently of the change of address when they became aware of it.

As a result, no copies of the claim form, particulars of claim, or any related correspondence were ever received from the Court, the Claimants, or their solicitors. The claim was also never mentioned in email exchanges with the Claimants since then.

Besides, since September 2022, we had informed the Claimants' solicitors that we would accept service of all documents by email and would prefer service to be effected by email. Despite this, we presume this claim was served only by post and sent to the wrong address, making it clearly defective.

Notably, when it came to serving their costs claim a few months later the Claimants' solicitor took account of our preference and served it both by email and by post to the correct address.

2. No Notice of the Hearing

Jason Kallis

From: Tarquin Management <tarquin.management@gmail.com>
Sent: 10 June 2024 18:33
To: Martin, Mark; Jason Kallis; London RAP
Subject: Re: MM/LON/00AW/OCE/2023/0030 - 51 Draycott Place, London, SW3 3DB - Permission to appeal
Attachments: permission to appeal form.pdf

Further to my email from earlier today, please find attached the application for permission form for the permission to appeal.

Regards

Davy Thielens
for and on behalf of Tarquin Management Ltd



On Mon, 10 Jun 2024 at 15:27, Tarquin Management <tarquin.management@gmail.com> wrote:
Dear Mr Martin,

Please see attached permission to appeal/grounds of appeal, Permission to appeal form to follow shortly

Regards

Davy Thielens
for and on behalf of Tarquin Management Ltd

Jason Kallis

From: Jason Kallis
Sent: 11 July 2025 16:00
To: 51dp@davylondon.net; Davy Thielens; 'Mario Angiolini'; russ_691@hotmail.com
Cc: Galani GB Karolina; sibelerdem@erdemhukuk.com Sibel Erdem; Pinar Erdem; Galvin Dominic; Erdem Bahadır; John Galani
Subject: [DPS:4I:51DR001/001:E] 51 DRAYCOTT PLACE, LONDON: REQUESTS FOR INFORMATION ABOUT POLICE RAIDS, AND DRUGS FOUND AT THE FLAT. PLEASE RESPOND WITHIN 7 DAYS
Attachments: Package front.jpg; Package back.jpg; Letter sent to John Baker front.jpg; Letter sent to John Baker Back.jpg; Baseball bat.jpg

Dear Russell, Mario and Davy

51 DRAYCOTT PLACE, LONDON: REQUESTS FOR INFORMATION ABOUT POLICE RAIDS, AND DRUGS FOUND AT THE FLAT. PLEASE WILL RUSSELL, AND MARIO/DAVY RESPOND WITHIN 7 DAYS

I must interject and respond to your email below because we are dealing with court proceedings here, and as an officer of the court what you are essentially trying to allege is that I have misled the court. I have done no such thing.

I set out below a justification of my position to date. I believe it is a full justification for my stance at the very least, and good evidence that the vesting order proceedings must be dealt with expeditiously now. I note the court appears to agree, having listed the hearing during a holiday season.

Evidence of Illegal Activity

Do remember that all I need to do is satisfy myself that on the balance of probabilities there is evidence to suggest drug dealing has been going on at the Property, and it is likely to have emanated from Flat 2 and involved Russell. I do not need to prove anything beyond a reasonable doubt.

The concern here is not just about the use of marijuana (although that does not help at all), but the fact that a significant amount of Class A of drugs has been found near to the door of Flat 2. The amount involved could only possibly be linked to drug dealing. My instructions are that packages of drugs sent by post were found in the corridor outside Flat 2.

How the Class A Drugs Were Found

As one of my clients was expecting a delivery (of a Christmas Present), in 2023, and one such package arrived just before Christmas that year, one such package was opened by mistake. They did this as it appeared it may have been what they were expecting. In it a significant amount of pills were found. The Police were called, and after testing the Police confirmed that they were ecstasy tablets (these packages were worth tens of thousands of pounds we understand). At least one of these packages was found near to the door of Flat 2 (within the hallway in front of flat 2). I will say nothing more about that for now, but suffice it to say the Police have clearly made their own enquiries as a result of this find.

Police Raid

Subsequently, the Police raided Flat 2 - Russell's flat. This has happened twice, due to what can only be described as their (reasonable) suspicions, and quite probably arising out of these packages being discovered, amongst other things no doubt. Obviously, we cannot know beyond a reasonable doubt who these packages were sent to (the address being for no particular flat, and not addressed to anyone known to be resident in the building). Nor do we know exactly what more the Police have found out subsequently, as if they told us about that, in doing so, they may

disturb an investigation and the prosecution of any charges. I believe that it is standard police procedure not to divulge information about a prosecution such as this, as I am sure you are aware. They have not breached that procedure in any way. However, the very fact of the raids took place is enough evidence of illegal activity to be used in a civil procedure on its own. In the context of what I say here, and have before, it is more than enough evidence.

Further, for the reasons set out in this email, I consider we have already set out the evidence needed in a case such as this, to prove on the balance of probabilities that there has been illegal activity in flat 2, and it is probably related to drugs (albeit that may not be the sole or only reason for any arrests made). Nonetheless, since you are making out that Russell has nothing to do with all of this I must point out that we have evidence to suggest otherwise, as set out in this email.

It is not an insignificant point to say that it is rare that a property gets raided by the Police, particularly in this area of London one would think. It is much more rare for them to take place twice within around 12 months.

Further Evidence

This is enough evidence I believe to put to a court safely, as a solicitor, in the way that I have. I believe it is also probably enough to convince a civil court judge that illegal activity has taken place in the flat concerned. However, in addition, I am also aware of the following:

- (a) During the second raid one of my client's came out of their flat to see what was going (as you can imagine there was a commotion outside and inside during the procedure). They saw that the flat has been raided, and Flat 2's door had been broken down. One of the Policemen involved asked my client whether he was Russell, and when another person entered the communal areas shortly after that exchange, they were asked whether they were Russell, and at that point the Policeman was heard making it clear that the Police were looking for Russell so that he could be arrested. I do not know finer details than that, but I do not believe I need to.
- (b) Subsequent to the second raid, a letter was seen in the communal areas to the property, which stated on the back that the return to sender name was Russell. It was addressed to a John Baker. We believe that letter was written by Russell due to the return to sender on the back of the letter. The address to return the letter to was HM Prison at Wandsworth. This letter was sent to Mr Baker at Flat 2, and it is not a quantum leap to suggest that Mr Baker lived with Mr Russell, or stayed there for a time, therefore.

To help you I attach a photographs of the letters referred to above.

The Position of the Police

The Police have found reasons and evidence to endeavour to arrest Russell for what was going on in that flat. That evidence would have had to have been strong enough to have justified the search warrant to commence both raids. That is a relatively high evidential hurdle, and they will have needed to have been established their position twice. Indeed, they have done that for a second time, despite failing to charge anyone the first time around, not an easy task at all I imagine.

Yet further, it appears the Police refused bail (if the letter from Russell is anything to go by) after charging someone with something we believe must have something to do with this activity. They almost never refuse bail. Indeed, that decision would be by a senior Policeman who had to be convinced that there was a serious crime going on and/or a risk of flight, or worse. A significant level of Police resource would have been needed to do all this, and as we all know Police resources in London are at a premium, yet it was being used here.

None of that is irrelevant when looking at whether the matter should be taken into account on the balance of probabilities in a civil court.

Effect of Raids and related incidents on Vesting Order Proceedings

Whilst the vesting order matter does not hinge on this issue; the vesting order will be made whether or not we are right about the drugs being the cause of the raids and an arrest, but I would say all this must be taken into account. However, this all relevant to what costs should be ordered, against whom those costs should be ordered, and how quickly the matter should be dealt with (particularly because of your reaction to the incident, which is in essence to show umbrage at my clients raising the issue, even though theirs is a normal reaction to what I think we can agree are extraordinary events). Given we know drugs were found in the vicinity of the door of Flat 2, and that there have been 2 raids and what appears to be an arrest as a result, it is in fact you, Mario and Russell, that need to send evidence to us, I say, to explain why you Russell is not implicated in the raids, and explain your current stance.

This is important as, in my view, a County Court judge would be within their rights, as I believe we are, to take this activity and your reaction to it into account when deciding what to do in the vesting order proceedings. I am more than happy to hear your side of the story, but it must be backed up by some evidence.

Requests for Information from Russell

Whilst you allege that Russell was not the person arrested the fact that he was sending correspondence from a prison after the raid (and the fact that the Police made it clear it was Russell they wanted to arrest) does enough on the balance of probabilities for me to continue with my assertions to the civil court. I am happy to be corrected, but I do not believe anything I have said to date is inappropriate at all given my position, set out here. What I've said to the Court was needed to ensure the matter is expedited.

With this in mind I require Russell to email me here and then call me via a video link (I have no other way of confirming your identity) I will send to him privately, to confirm what happened during the raid, and in particular that:

- 1 He was not the person arrested the second raid on his flat,
- 2 he was not remanded in custody after that raid, and
- 3 if he was not the person arrested, who was, and why was he in his flat?

Requests for Information from Mario and Davy

If any of our position on this is not accurate, then you (Mario and Davy) must, I consider, explain why well before the forthcoming hearing. If you dispute any of what I have said, now is the time to tell the other long leaseholders, and me, what you say is wrong with our position, and what you say happened, and give us evidence to show why Russell or other persons in occupation (if that is what you are alleging) are or are not implicated. Remember this is not a criminal case, so I will be looking at what you say, and the evidence in support, with the balance of probabilities test in mind. So will any judge.

Mario and Davy, if Russell does deny being involved I consider that you must provide us with an explanation of what actually happened during the raids within a further 7 days, to your knowledge.

If you have made a Police complaint that has been upheld or yet to be resolve provide evidence of that complaint and how it was resolved. I do not accept that the agreement to repair a broken door means anything in that context by the way – the occupants do not own the flat, and so the Police are somewhat beholden to you, Mario, to that extent. If you think that's wrong do explain why.

Time for Response

Please would Russell, and you Mario, respond separately, within 7 days, in writing, to the above – we will check the probity of the responses elsewhere. Suffice it to say your responses will be relied on in court. Do bear that in mind.

Checking of Response or Consequence of No Clear Response

What you say in response to this email ought to be checked, and the costs borne out of any future investigation or fact gathering process claimed within these proceedings if it turns out that essential matters are not revealed or indeed supported.

If you do not respond, or send a clear and direct answer to my questions (in the past long emails have been sent in replies to my requests most of which was very much off point – any such response not answering the above directly and clearly will be treated as a non-response), I will ask the Court to make the necessary inferences.

Misc

It is to my mind not beyond a court to decide that the lease of flat 2 should be forfeited (notwithstanding it has significant value, what we say above is an illegal act) if this matter persists and you continue to maintain your current position without explaining why your stance, and providing evidence to support that contention. Your non response to the above will be factored into whether that action is taken.

I would add one other point. During the last few years a baseball bat, that does not belong to any of my clients, was left at the area around the front door, amongst other things. See the photograph attached. This added the potential for physical violence to all those living in this block (it was highly unlikely to have been stored by the front door for recreational purposes in my view), and so your points about CCTV cameras and people and coming and going (whom you cannot possibly know are the full category of people that would like to do so), is insensitive, to say the least.

Mario is in direct copy.

The email below, and this email, will be put before the court in due course if needs be, along with any responses.

Yours sincerely
Jason Kallis

From: Tarquin Management Ltd - Draycott Place <51dp@davylondon.net>

Sent: Thursday, July 10, 2025 5:46 PM

To: John Galani <john@galani.com>

Cc: Galani GB Karolina <karolina@galani.com>; sibelerdem@erdemhukuk.com Sibel Erdem <sibelerdem@erdemhukuk.com>; Pinar Erdem <pinarerdem@erdemhukuk.com>; Galvin Dominic <dgalvin@c-sr.com>; Erdem Bahadır <bahadirerdem@erdemhukuk.com>; Jason Kallis <JKallis@meralibeedle.com>; russ_691@hotmail.com

Subject: Re: Overpowering marijuana smell in the hallway

Dear John,

Subject: Allegations Concerning Flat 2 Tenant

Dear John,

The time has come for me to address more directly your two reports of smell of marijuana in the hallway since April 2024, when I took over the building management.

Both reports were accompanied with express threats against the company and therefore me personally as its director, to call the police unless we complied with your demands and resolved the issue to your satisfaction. As is clear from your solicitor's submissions to the County Court, the only "resolution" you are looking for and would regard as adequate is the immediate eviction of Russel from Flat 2. Nothing else will suffice. I will deal with those threats at the end of this email, but the threats to me and the company now have to stop once and for all.

I have copied Russell in this email, as he should be aware of the ongoing allegations you are making against him. In the future, if you have personal allegations of criminal conduct to make against Russell, you should raise them with him in the first place. He can decide if and how to respond to them.

TO:
David Nicomedes
51 Draycott Place
London
SW3 3DB
United Kingdom

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