

CROWN COURT PROSECUTION BUNDLE

CASE REF: R v JAMES PATTERSON

CASE DETAILS

Case Number: ** T2024001234
Court: Crown Court at Manchester
Prosecution Authority: Crown Prosecution Service
Defendant: James Patterson (DOB: 15/03/1987)
Defence Solicitor: Smith & Co Solicitors
Date of Offence: 14/11/2023
Time of Offence: 19:45 hours
Date of Charge: 18/11/2023
First Hearing: 22/11/2023
Trial Date: 15/04/2024

CHARGES

COUNT 1: WOUNDING WITH INTENT TO CAUSE GRIEVOUS BODILY HARM

Contrary to section 18 of the Offences Against the Person Act 1861

PARTICULARS OF OFFENCE:

James Patterson, on the 14th day of November 2023, at approximately 19:45 hours, in the vicinity of Market Street, Manchester, unlawfully and maliciously wounded Sarah Mitchell with intent to do her grievous bodily harm, by striking her multiple times about the head and body with a metal implement, causing serious injuries including a fractured cheekbone, severe bruising, and lacerations requiring surgical intervention.

TIMELINE OF EVENTS

Date	Time	Event
14/11/2023	19:30	Sarah Mitchell leaves workplace at 42 High Street, Manchester
14/11/2023	19:42	CCTV footage shows individual matching defendant's description loitering near Market Street junction
14/11/2023	19:45	INCIDENT OCCURS - Sarah Mitchell attacked from behind
14/11/2023	19:46	Witness Michael Chen observes incident from 15 metres away
14/11/2023	19:47	Sarah Mitchell calls 999 from nearby shop
14/11/2023	19:55	Police officers PC David Thompson and PC Emma Wilson arrive at scene
14/11/2023	20:15	Sarah Mitchell transported to Manchester Royal Infirmary
14/11/2023	20:30	Medical examination conducted by Dr. Priya Sharma
15/11/2023	10:00	Forensic examination of scene conducted
18/11/2023	14:30	Defendant James Patterson arrested at home address (12 Oak Tree Close, Salford)
18/11/2023	15:00	Interview under caution at Longsight Police Station
18/11/2023	18:00	Defendant charged with section 18 offence, remanded in custody
22/11/2023	10:00	First appearance at Manchester Magistrates' Court, case sent to Crown Court

WITNESS STATEMENTS

WITNESS 1: SARAH MITCHELL (Complainant)

Statement Date: 14/11/2023

Statement Time: 20:30

Officer: PC David Thompson (Badge 4521)

Witness Type: Complainant/Victim

"I was walking along Market Street at about quarter to eight in the evening. I had just finished work and was heading to the bus stop to go home. I was carrying my handbag over my right shoulder. It's a black leather handbag, quite large, with a long strap.

As I approached the junction with Back Lane, I felt someone grab my left arm very forcefully from behind. I was pulled backwards and lost my balance. A male voice said 'You're going to pay for what you did' and then I felt something hard hit the side of my face. It was extremely painful.

I fell to the ground and the person continued to hit me. I could see they were holding something metallic, maybe a metal bar or pipe. They struck me several times - on my face, my arms, and my body. I was trying to protect myself but I couldn't. The person was much stronger than me.

I remember screaming and trying to get away. The person said something like 'This is what happens' but I was in so much pain and shock I can't remember exactly. They hit me at least four or five times before running away.

I didn't get a good look at their face because it happened so fast and it was quite dark, but I could see they were wearing a dark hooded top and dark trousers. They were about average height, maybe 5'10" or so, and seemed to be a white male. I'm fairly certain it was a man based on the voice and strength.

I called the police straight away from a shop nearby. My face was bleeding badly and I couldn't see properly out of my left eye. My whole body hurt. I was terrified and in a lot of pain. I've never experienced anything like this before.

I don't know why this happened to me. I don't recall having any interaction with this person before the attack. It seemed completely unprovoked from my perspective."

WITNESS 2: MICHAEL CHEN (Independent Witness)

Statement Date: 14/11/2023

Statement Time: 20:45

Officer: PC Emma Wilson (Badge 3892)

Witness Type: Independent Civilian Witness

"I was walking along Market Street on my way home from work. I work as a chef at the restaurant on the corner. It was about 7:45pm, maybe a bit later. The street was reasonably well-lit but it was dark outside.

I saw a woman walking ahead of me, maybe 20 or 30 metres away. She was carrying a handbag. Then I saw someone come up behind her very quickly. This person grabbed her and there was a struggle. I could see the person was holding something - it looked like a metal bar or pipe, maybe 30 or 40 centimetres long.

The person hit the woman several times. I could hear the impacts and the woman screaming. It was very violent. The person struck her on the head and body multiple times. The woman fell to the ground and the person continued to hit her while she was down.

I couldn't see the person's face clearly because they had a hood up, but they were wearing dark clothing - a dark hoodie and dark trousers or jeans. They were average height, maybe 5'9" to 5'11", and appeared to be male. The whole thing lasted maybe 30 seconds, then the person ran off down Back Lane.

I went over to help the woman. She was on the ground and there was blood on her face. She seemed very distressed and in a lot of pain. She was asking me to call the police, which I did immediately. I stayed with her until the police arrived about 5 or 10 minutes later.

I was shocked by what I saw. It was a very brutal attack. The person seemed to be deliberately trying to hurt her, not just rob her."

WITNESS 3: PC DAVID THOMPSON (Attending Officer)

Statement Date: 15/11/2023

Statement Time: 09:00

Officer: DS James Morrison (Badge 2103)

Witness Type: Police Officer

"On 14th November 2023, I was on duty with PC Emma Wilson. At approximately 19:47 hours, we received a call to attend Market Street, Manchester, following a report of a serious assault.

We arrived at the scene at 19:55 hours. The complainant, Sarah Mitchell, was present and appeared to be in significant distress. She had visible injuries to her face, which was bleeding. Her left eye was swollen and she appeared to have difficulty seeing. She had visible bruising and injuries to her arms and body.

I observed the scene. Market Street is a busy pedestrianised area with good lighting and CCTV coverage. There were bloodstains on the pavement at the location described by the complainant, consistent with her account.

I took an initial statement from Sarah Mitchell. She was able to provide a clear account despite being clearly shaken and in pain. She described being attacked from behind by a male who struck her multiple times with what she believed was a metal implement.

I also spoke to a witness, Michael Chen, who provided a statement confirming he had observed the attack and saw the assailant striking the complainant multiple times with a metal object.

I arranged for Sarah Mitchell to be transported to hospital immediately for medical examination, as her injuries appeared serious.

The following day, I reviewed CCTV footage from cameras in the area. The footage showed an individual matching the description provided by witnesses, loitering in the area prior to the incident and running away immediately afterwards. The footage was of sufficient quality to identify the individual as James Patterson, who was known to police.

A search of police records showed that James Patterson had previous convictions for violence, including a conviction for ABH in 2021. He was subject to a community order at the time of this offence.

Given the serious nature of the injuries and the apparent use of a weapon, the case was treated as a section 18 offence (wounding with intent to cause GBH) rather than a section 47 (ABH) or section 20 (unlawful wounding)."

CCTV EVIDENCE

Camera Location: Market Street / Back Lane Junction

Camera Reference: MS-CCTV-042

Date: 14/11/2023

Time Range: 19:30 - 20:00

Officer Reviewing: PC David Thompson

Review Date: 15/11/2023

SUMMARY OF FOOTAGE:

- **19:42:** Individual matching defendant's description visible loitering near junction, wearing dark hooded top and dark trousers. Individual appears to be holding an object (consistent with metal bar/pipe described by witnesses).
- **19:45:** Individual approaches female from behind, struggle visible. Individual can be seen raising arm and striking motion visible.
- **19:45:** Female falls to ground, individual continues striking motion multiple times (at least 4-5 visible strikes).
- **19:46:** Individual runs down Back Lane, out of view of this camera. Object still visible in individual's hand as they run.

Facial Recognition: Facial recognition software identified the individual as James Patterson (confidence level: 92%). Still images extracted and shown to witnesses for identification. Both Sarah Mitchell and Michael Chen identified the individual from still images as the person who committed the attack.

Additional Cameras: Footage from Back Lane camera (BL-CCTV-015) shows individual running down the street and discarding an object into a bin at 19:47. The object was recovered and forensically examined - it was a 35cm length of metal pipe, consistent with witness descriptions.

MEDICAL EVIDENCE

Hospital: Manchester Royal Infirmary

Attending Doctor: Dr. Priya Sharma (Consultant in Emergency Medicine)

Date of Examination: 14/11/2023

Time: 20:30

Report Date: 16/11/2023

INJURIES DOCUMENTED:

1. Fractured Left Zygomatic Arch (Cheekbone):

- Complex fracture requiring surgical intervention
- Caused by blunt force trauma
- Consistent with being struck with a hard object
- Surgery performed on 15/11/2023

2. Severe Bruising to Left Side of Face:

- Extensive bruising covering left cheek, eye socket, and temple
- Left eye swollen shut
- Bruising consistent with multiple impacts
- Estimated age: fresh (within 2-3 hours of examination)

3. Lacerations to Face:

- Three lacerations requiring sutures:
 - 4cm laceration above left eyebrow (8 stitches)
 - 3cm laceration to left cheek (6 stitches)
 - 2cm laceration to lower lip (4 stitches)

4. Bruising to Arms and Torso:

- Multiple areas of bruising to both arms, consistent with defensive injuries
- Bruising to left upper arm: 10cm x 8cm area

- Bruising to right forearm: 8cm x 6cm area
- Bruising to ribs on left side: 12cm x 10cm area

5. Abrasions and Grazes:

- Multiple superficial abrasions to hands, knees, and elbows
- Consistent with falling to ground and struggling

6. Psychological Impact:

- Patient displayed signs of acute stress, anxiety, and trauma
- Diagnosed with acute stress reaction
- Referred for psychological support and counselling
- Patient reported ongoing fear, difficulty sleeping, and flashbacks

MEDICAL OPINION:

All injuries are consistent with the account provided by the complainant. The nature and severity of the injuries, particularly the fractured cheekbone and multiple impact sites, are consistent with a sustained and deliberate attack using a hard object. The injuries are not consistent with a single accidental fall or minor altercation.

The injuries required significant medical intervention and will likely result in permanent scarring. The psychological impact is also significant and ongoing.

CUSTODY & PACE DETAILS

ARREST DETAILS

Date of Arrest: 18/11/2023

Time of Arrest: 14:30

Location: 12 Oak Tree Close, Salford (defendant's home address)

Arresting Officer: DS James Morrison

Grounds for Arrest: Reasonable suspicion of committing section 18 OAPA 1861 offence

PACE Rights Given: Yes, at 14:35
Custody Officer: Sgt. Amanda Foster
Custody Number: CUST-2023-1847

CUSTODY RECORD

Time	Event
14:35	Arrived at Longsight Police Station
14:40	Booked into custody by Sgt. Amanda Foster
14:45	Medical examination conducted (fit for interview)
14:50	Legal advice requested - duty solicitor assigned
15:00	Interview commenced (with legal representative present)
16:30	Interview concluded
17:00	Charged with section 18 OAPA 1861
17:15	Remanded in custody pending court appearance
18:00	Transferred to HMP Manchester

PACE COMPLIANCE

- ☒ Rights and entitlements given at appropriate times
- ☒ Appropriate adult not required (defendant over 18)
- ☒ Legal representative present throughout interview
- ☒ Interview audio and video recorded
- ☒ All PACE Codes of Practice complied with
- ☒ Detention reviewed at appropriate intervals

BAIL DECISIONS

First Bail Application: 22/11/2023
Decision: REFUSED
Grounds for Refusal:

- Seriousness of offence (section 18 is an either-way offence with maximum life sentence)
- Risk of re-offending (defendant subject to community order at time of offence)
- Risk of witness interference
- Risk of absconding (defendant has previous failures to appear)

Second Bail Application: 15/12/2023

Decision: REFUSED

Grounds: As above, plus concerns about defendant's compliance with previous court orders

Current Status: Remanded in custody at HMP Manchester

Next Bail Review: 20/02/2024

DEFENDANT'S PREVIOUS CONVICTIONS

Name: James Patterson

DOB: 15/03/1987

PNC Number: 87/123456P

CONVICTION 1:

- **Date:** 12/06/2019
- **Offence:** Theft (shoplifting)
- **Court:** Manchester Magistrates' Court
- **Sentence:** 12-month community order, 80 hours unpaid work
- **Details:** Stole items valued £120 from retail store

CONVICTION 2:

- **Date:** 08/03/2021
- **Offence:** Assault Occasioning Actual Bodily Harm (section 47 OAPA 1861)
- **Court:** Manchester Magistrates' Court
- **Sentence:** 6-month community order, 40 hours unpaid work, £200 compensation

- **Details:** Assaulted partner during domestic incident. Used violence causing bruising and cuts.

At time of current offence: Defendant was subject to a community order imposed on 08/03/2021, which had 3 months remaining. This represents a breach of that order.

POLICE INTERVIEW

Date: 18/11/2023

Time: 15:00 - 16:30

Location: Longsight Police Station

Interviewing Officers: DS James Morrison, DC Sarah Ahmed

Legal Representative: Ms. Jennifer Walsh (duty solicitor)

Recording: Audio and video recorded (PACE compliant)

KEY EXCERPTS:

DS Morrison: "James, you've been arrested on suspicion of wounding with intent to cause grievous bodily harm, contrary to section 18 of the Offences Against the Person Act 1861. This is a very serious offence. Do you understand why you're here?"

Defendant: "No comment."

DS Morrison: "We have CCTV footage placing you at Market Street on the 14th of November at 19:45, which is exactly the time this attack occurred. Can you explain what you were doing there?"

Defendant: "No comment."

DS Morrison: "We have witnesses who saw you attack Sarah Mitchell. Can you account for your movements that evening?"

Defendant: "No comment."

DS Morrison: "The complainant, Sarah Mitchell, has identified you from CCTV stills. Do you know this woman? Have you had any previous contact with her?"

Defendant: "No comment."

DS Morrison: "We recovered a metal pipe from a bin on Back Lane. Your fingerprints were found on it. Can you explain how your fingerprints came to be on this weapon?"

Defendant: "No comment."

DC Ahmed: "James, this is a very serious matter. Sarah Mitchell suffered a fractured cheekbone and required surgery. She's been left with permanent scarring. If you have any explanation, now is the time to give it."

Defendant: "No comment."

[Defendant provided "no comment" responses to all questions throughout the interview. No alibi provided, no explanation given for presence at scene, no admission or denial of involvement, no explanation for fingerprints on weapon.]

DISCLOSURE GAPS

The following items have been requested by the defence but have **NOT YET BEEN PROVIDED** by the prosecution:

1. FULL CCTV FOOTAGE

Requested: Complete unedited footage from all cameras covering Market Street, Back Lane, and surrounding areas between 19:00 and 20:30 on 14/11/2023.

Status: Prosecution has only provided edited clips (approximately 2 minutes total). Defence requires full footage to establish:

- Defendant's movements before and after incident
- Whether defendant was alone or with others
- Whether there was any interaction between defendant and complainant prior to attack
- Full context of the incident

2. MOBILE PHONE DATA

Requested: Cell site analysis and complete call/text records for defendant's mobile phone (number: 07700 900123) for the period 13/11/2023 to 19/11/2023.

Status: Not yet provided.

Relevance: To establish defendant's location and movements, and to identify any communications that might be relevant to motive or planning.

3. FORENSIC EVIDENCE - FULL REPORT

Requested: Complete forensic report including:

- Full DNA analysis methodology and results
- Fingerprint analysis methodology (beyond simple match)
- Fibre analysis
- Analysis of any other trace evidence
- Chain of custody documentation for all exhibits

Status: Initial report states "fingerprints found on weapon" but full methodology, quality of prints, and other forensic evidence not disclosed.

4. WITNESS CREDIBILITY MATERIALS

Requested:

- Any previous statements made by Sarah Mitchell or Michael Chen in other cases
- Any convictions, cautions, or reprimands for witnesses
- Any known associations between witnesses and defendant
- Any previous complaints or allegations made by Sarah Mitchell

Status: Not yet provided.

Relevance: Goes to credibility of prosecution witnesses.

5. POLICE NOTEBOOK ENTRIES (PNB)

Requested: Full PNB entries for all officers involved (PC Thompson, PC Wilson, DS Morrison, DC Ahmed) for 14/11/2023 and 18/11/2023.

Status: Only formal statements provided. PNB entries may contain contemporaneous notes, observations, or information not included in formal statements.

6. EVIDENCE OF SEARCH

Requested:

- Full details of search of defendant's home address on 18/11/2023
- Inventory of all items seized
- Photographs of search
- Any items found but not seized
- Any items found that might assist defence

Status: Not yet provided.

7. MEDICAL RECORDS - COMPLAINANT

Requested: Full medical records for Sarah Mitchell, including:

- Previous attendances at hospital
- Mental health history
- Any history of self-harm or substance misuse
- Any previous injuries that might be relevant

Status: Only report of examination on 14/11/2023 provided.

Relevance: May be relevant to causation of injuries or credibility.

8. DEFENDANT'S MEDICAL RECORDS

Requested: Medical records for defendant, particularly:

- Mental health assessments
- Any conditions that might affect memory or reliability
- Any medication that might be relevant

Status: Not yet provided.

Relevance: May be relevant to fitness to plead, special measures, or sentence.

9. PREVIOUS INCIDENTS

Requested: Details of any previous incidents or complaints involving:

- Defendant and complainant
- Defendant and witnesses
- Any similar incidents in the area

Status: Not yet provided.

10. EXPERT EVIDENCE

Requested:

- Full reports from any experts consulted (beyond initial medical report)
- Instructions given to experts
- Any expert evidence that might assist defence

Status: Only initial medical report provided. No indication whether other experts (e.g., pathologist, weapons expert) have been consulted.

These disclosure gaps are material and may be relevant to the defence case. They should be addressed prior to trial to ensure fairness and compliance with the Criminal Procedure and Investigations Act 1996.

PROSECUTION CASE SUMMARY

The prosecution case is that on 14th November 2023, James Patterson unlawfully and maliciously wounded Sarah Mitchell with intent to cause her grievous bodily harm, contrary to section 18 of the Offences Against the Person Act 1861.

PROSECUTION EVIDENCE:

1. Identification Evidence:

- CCTV footage clearly shows defendant at the scene at the time of the offence
- Facial recognition software identified defendant with 92% confidence
- Both complainant and independent witness identified defendant from CCTV stills

2. Witness Evidence:

- Complainant provides clear and consistent account of being attacked with a metal implement
- Independent witness (Michael Chen) corroborates the account and observed the attack

- Attending officer (PC Thompson) provides evidence of injuries and scene

3. Medical Evidence:

- Serious injuries including fractured cheekbone requiring surgery
- Multiple impact sites consistent with sustained attack
- Injuries consistent with being struck with hard object (metal pipe)
- Permanent scarring and ongoing psychological impact

4. Forensic Evidence:

- Defendant's fingerprints found on metal pipe recovered from scene
- Pipe consistent with weapon described by witnesses
- Blood at scene matches complainant

5. Defendant's Conduct:

- Defendant provided "no comment" interview, failing to provide any account or alibi
- Defendant has previous convictions for violence (ABH in 2021)
- Defendant was in breach of community order at time of offence

PROSECUTION SUBMISSION:

The prosecution case is strong. There is clear identification evidence placing the defendant at the scene at the time of the offence. The injuries are serious and consistent with an attack using a weapon. The defendant's fingerprints on the weapon provide strong forensic evidence. The defendant's failure to provide any account, combined with his previous convictions for violence, supports the prosecution case that this was a deliberate and intentional attack with the intent to cause grievous bodily harm.

The prosecution will invite the jury to convict the defendant of the section 18 offence.

END OF BUNDLE

This bundle has been prepared in accordance with the Criminal Procedure Rules and the Attorney General's Guidelines on Disclosure.