



Richard Simons has a predominantly defence based practice. He is instructed in a wide variety of cases concerning serious and organised crime. As can be seen below, he has appeared in a large number of significant cases involving offences of Murder (including alleged gangland executions), Robbery, Terrorism, Blackmail, Kidnapping, False Imprisonment, Money Laundering, Firearms, Prison Mutiny and Drug Importations. He is also instructed in a large number of offences of Fraud, including offences of Theft, Mortgage Fraud, PAYE Fraud, DWP Fraud, VAT Fraud and Corruption. He also has a particular interest in Confiscation Hearings and as a result of his practice has significant experience in conducting them. He is often instructed to conduct such hearings even when not briefed in the substantive trial.

#### SPECIALISATION

Criminal Law and Commercial and Regulatory Work

"A name one readily associates with top quality advocacy" – Chambers UK (2006)

## NOTABLE CASES

### MURDER

R v S – The alleged deliberate driving off the road of another motorist following an incident of road rage. The case involved significant expert scientific evidence.

R v G – The kidnapping, false imprisonment and torturing to death of a drug dealer over an unpaid debt.

R v Charles – The murder of a flat mate where the defendant thereafter cut the body into pieces before distributing the remains around various parks in Nottingham.

R v Brasher – A prison murder where the defendant allegedly garrotted his cell mate and then hung his body at the window in an attempt to make the death look like a suicide. Enquiries revealed that the defendant had allegedly tried to garrotte two previous cell mates.

R v J – The alleged beating to death of a man believed to be a paedophile, before disposing of his body in the Ship Canal.

R v Cassidy – An intended execution in a public house which went wrong when a ricochet killed an innocent customer

R v M – The beating to death of a landlord during the course of an armed robbery.

### ROBBERY

R v W – The then largest ever cash robbery in Europe (£6 million), none of which was ever recovered. Six week abuse hearing led to the indictment being stayed.

R v Pearson – A conspiracy involving nine substantive offences of robbery on Banks and Securicor vehicles.

R v Kelso – A conspiracy involving twenty armed robberies of Securicor vehicles when collecting or delivering money to Banks. The trial involved a Supergrass.

R v Calderbank – A conspiracy involving seven offences of robbery including one where the manager of a Public House was falsely imprisoned in his home and a tazer gun was used on him to obtain the code to the safe at the Public House.

### TERRORISM

R v S – A Security Services prosecution. The defendant was allegedly plotting to cause explosions in the Manchester and Birmingham areas.

R v Dr M – A Security Services prosecution. This was a defendant who had been acquitted in the above trial. He requested that Mr Simons conduct his defence. He was a PHD Chemist. Albeit that the jury were informed that the defendant had been previously acquitted of the same offence, having run the same defence (his expertise being sought by others when he had no knowledge as to the use that they were going to make of the information), he was again acquitted.

### BLACKMAIL

R v B – The alleged kidnapping and false imprisonment of an individual, for whose release a significant ransom was demanded.

R v O – An alleged £160 million Carousel Fraud, which led to a disagreement between the alleged conspirators. This resulted in the kidnapping and false imprisonment of the family of one conspirator whilst demands were made for the return of the monies from the fraud.

### KIDNAPPING AND FALSE IMPRISONMENT

R v Overend – The kidnapping and false imprisonment of two police officers in the middle of the night, whilst they were on duty, by a team of armed robbers who had been inadvertently stumbled upon by the Officers whilst lying in wait to kidnap a Bank Manager at his home in a rural area.

R v Boyle – The successive kidnapping and false imprisonment of three individual gang members, who were then shot or tortured in order to get them to reveal the whereabouts of the gang leader, who it was intended should be executed.

R v W – The kidnapping and false imprisonment of a minor.

## MONEY LAUNDERING

R v O'Brien – A £90 million money laundering case in which monies from a whole variety of criminal activities were dispatched to Dubai through a Travel Agent.

R v Khansia – A money laundering case which centred on the activities of the Khansia family and the financing by them of a substantial property portfolio. Much of the evidence related to dealings in Malawi.

R v Edwards – A case which concerned the laundering of the proceeds of drug dealing.

## FIREARMS

R v Wray – The importation of 30, loaded, silenced firearms from Lithuania

R v S – Drive by shooting with machine guns. This was a significant case due to the fact that it was the first reported case where the prosecution had a single identifying witness, who was allowed to remain anonymous. After cross examination the Judge was persuaded to change his ruling, and the witness was exposed as being a man who was not only known to the defendant but one who also bore a grudge against him.

R v Hussain – Gang Warfare with machine guns.

## PRISON MUTINY

R v Allen – Prison Mutiny at Full Sutton Prison. (Two month trial)

R v Mack – Prison Mutiny at Castington Young Offenders Institute

R v Bogle – Prison Mutiny at Lincoln Prison. (Three month trial)

R v Sultan – Prison Mutiny at Forest Bank Prison.

## DRUG IMPORTATIONS

R v Grange – Importation of Ecstasy (£6 million) - (Three month trial)

R v Marland – Importation of Class A drugs (£60 million) - (Three month trial)

R v O'Neil – Importation of Class A and B drugs (£50 million)

R v Bracken – Importation of Class B drugs (£5 million)

## DRUG MANUFACTURE AND SUPPLY

R v Brown – Amphetamine Factory (Two month trial)

R v Simpson – Manufacture of LSD, Amphetamine and Ecstasy (Three month trial)

R v Hilton – Manufacture of fake Ecstasy. (Three month trial)

R v Wright – Multi-million pound Class A supply (Three month trial)

## THEFT

R v Bagshaw – Breach of Trust. This case concerned the sophisticated theft of over £300,000 from the defendant's employer.

R v Entwistle – Conspiracy to Steal. The theft and realisation of £1 million worth of shares from an elderly man whom the defendant had befriended and was in ill health.

## CONSPIRACY TO CHEAT THE REVENUE

R v Ahmed – Conspiracy to Cheat the Public Revenue and Conspiracy to Defraud. This concerned the Managing Director of a knitwear factory who was prosecuted in two separate fraud trials by The Revenue and the Department of Work and Pensions. The allegations concerned the understating of wages over a six year period and the facilitating (deliberately) thereby of fraudulent tax credit claims by the employees.

R v McLeavey – Conspiracy to Cheat the Revenue. This was a Missing Trader Intra-Community Fraud and concerned an allegation of Cheating the Public Revenue out of £2.8 million. The prosecution case was that had arrests not been made, then the total figure would have been £10 million. The defendant was also charged with an offence under Section 1(1) of the Prevention of Corruption Act 1906. The defendant was alleged to have made corrupt payments to a VAT officer in return for blank VAT Registration Certificates. These were then used to perpetrate a Carousel Fraud to the above value.

R v G – A prosecution arising out of the alleged illicit activities of a Registered Charity. The case concerns three separate allegations of dishonesty, namely: i) Conspiracy to Cheat the Revenue (a PAYE Fraud) which is alleged to have been committed by the deliberate understating of employee wages; (ii) Theft, by the appropriation from the charity of a significant percentage of the donations made to it and (iii) Conspiracy to Cheat the Revenue, a Gift Aid Fraud, allegedly perpetrated by the non-declaration of the fact that the majority of the declared donations were from limited companies.

## EXCISE FRAUD

R v L – The defendant was the owner of a haulage company who was indicted (along with eight others) as a consequence of his alleged involvement in the importation of numerous lorry loads of cigarettes through various UK ports. The trial ran for twelve weeks before the jury was discharged as a result of non-disclosure. The prosecution did not ultimately resist the subsequent Abuse of Process Argument.

R v Moosa. – This case concerned the importation of cigarettes from China, via Dubai into Southampton Docks.

## PRIVATE SECTOR FRAUD

R v M – Long Firm Fraud. The defendant was a Director and Company Secretary.

## CONSPIRACY TO DEFRAUD

R v S – Conspiracy to Defraud. The fraud alleged was against various persons and bodies who agreed to pay for advertisements in a Crime Prevention Yearbook. The Prosecution alleged that the fraud was carried on in the course of the operation of two companies, namely: Barclay Seymour Limited and Fullerton Publications Limited. The apparent business of the companies was to produce Crime Prevention Yearbooks for distribution supported by advertisements from clients who were contacted by telesales staff employed by the two companies. It was alleged that there was no intention to produce yearbooks in the manner promised to clients.

## FRAUDULENT TRADING

R v B – Fraudulent Trading and Assisting a Bankrupt. - The allegations arose out of Ms B's role as Company Secretary with Omega Imported Brands Limited. This company was in her son's name although the entire thrust of the Prosecution case was that it was actually her ex-husband's, company. The case involved Omega Imported Brands Limited being used for significant fraudulent purposes. A number of individuals and companies were cheated out of a substantial amount of money as a result.

## VAT FRAUD

R v E – This was a repayment fraud and concerned a defendant who was alleged, over a significant period, to have been involved in ten bogus companies; all of which purported to deal in computer hardware sourced in Russia.

R v C - . The defendant was a Company Secretary in a textile firm who it was alleged had made bogus repayment applications for goods that he had allegedly exported, when in fact they had been sold in the UK.

## CONFISCATION HEARINGS

R v McLeavey - £3 million Confiscation Proceedings  
R v Grange - £3 million Confiscation Proceedings  
R v Mulvey – £750,000 Confiscation Proceedings  
R v Ravenscroft - £500,000 Confiscation Proceedings  
R v Broom - £500,000 Confiscation Proceedings

## EDUCATION / PROFESSIONAL

LLB (Hons)  
Criminal Bar Association

## APPOINTMENTS

President of Mental Health Review Tribunal.