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Awdry Bailey & Douglas
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Devizes

Your Ref: CE.MOR01126/001
Our Ref: LM/MOR00450/00001
Date: 12th July 2018

Dear Sirs

Your client: Chloe Marie Morrell
Our client: Richard Michael Morrell

We confirm receipt of your letter of 29 June 2018.

With regard to the occupation of the family home, our client is a joint legal owner and therefore remains entitled to be in the property. Notwithstanding this, our client has been absent from the home for large periods, including looking after the children away from the home, due to concern over your client's veiled and continual threats regarding the use of a non molestation order and occupation order. Our client has been keeping a detailed record of all contact with your client due to very real concerns that your client's behaviour is having upon our client's health.

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Calne, Chippenham, Corsham,
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Richard suffered a stroke in 2015 and the continued atmosphere caused by living under the threat of removal - without grounds - are causing him ill health and he has taken medical guidance. He is now under medication because of the stress your client's continued behaviour has caused. He is seeing a therapist and is also trying to hold down a full time job. Your client's behaviour is impacting on that. At present, our client is the only party working and his job is funding all outgoings. This is at risk if your client's behaviour continues.

Our client's main concern continues to be the children.

We are informed that social services met with the children at their school. Neither child disclosed any concerns about their father, with both children informing the social worker that they saw their father's care as making them feel safe and secure. Your client has had no issue with leaving the children with Richard both during the marriage and following the parties' separation.

The children have, however, disclosed extremely worrying information about their mother's conduct including witnessing sexual activity between your client and her now partner Claire Gilchrist when William was off sick from school with chickenpox. Social services are now, as we understand, liaising with agencies and the school to understand what further action should be taken. We have been in touch with the NSPCC who have spoken to Wiltshire Council Child Services. Social Services share our concerns and will be making detailed recommendations to prevent Mrs Morrell and Ms Gilchrist putting the children at any further risk.

The NSPCC have clarified and are supporting our client and classify the occurrence witnessed by William as Primary Non Contact Child Sex Abuse. The description of the events meeting the definition of the offence. This is an extremely serious matter and Ms Gilchrist must not now be allowed any contact with the children in the marital home. Our client has affirmed that Ms Gilchrist is not allowed in the marital home and you have been made aware of this in writing. I understand that Social Services share concerns over your client and Ms Gilchrist's lack of sexual boundaries. No child should be exposed to behaviour of this type and should the matter go before the family court a prohibited steps order will be applied for to protect the children on a formal basis.

Our client is also very concerned about the state of the family home since he has been staying out of the property. We are informed that out of date food is left in the property, dirty dishes are piling up and the rooms are dirty and untidy. Our client did several loads of washing when he returned to the property with the children at the weekend and also cleared out several bags of rubbish. We ask that your client keep the property clean and free of germs for the children's sake.

As agreed with social services, our client is currently staying away from the family home in the hope that this allows the house to remain calm for the children until this coming Sunday. We understand that your client intends to remove the children to her mother's home in Devizes on his return preventing him access to the children.

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This is wholly unnecessary and against the children's clearly expressed wishes to social services. Our client is a home worker whose employer has afforded him the time and ability to now spend more time at home with less hours to allow him the ability to take the children to school and pick them up.

Our client does not wish to visit or have anything to do with your client's family and does not consent to the children being removed to Devizes. However, this does not stop your client from staying at her mother's or Mrs Gilchrist's shared property which she indicates she can use safely. The children are already regularly in our client's care which affords continuity and support to them.

Our client has no wish to subject himself to further false allegations being made against him by your client. Our client therefore confirms that he will stay out of the family home until Friday 20 July 2018, in order to give your client the opportunity to consider the below.

It is clear that an agreement needs to be reached urgently for the care of the children, to ensure that the children have a secure base with their father and a clean and secure base with their mother, pending resolution of the financial arrangements.

Our client would wish for the arrangements for the children to be agreed without delay, and we therefore write to propose the following:-

1. That the children spend alternate weekends with each parent (as has been happening since the separation) from Friday to Sunday;
2. That the children spend two nights, overnight, with their father each week on days to be agreed, between Monday and Thursday;
3. That the school holidays are divided equally between the parties;
4. That the children spend mother's day and their mother's birthday with your client and vice versa;
5. That Christmas and Easter is alternated so that the children spend a block of one week with each parent, to include Christmas Day and Boxing Day and the Easter weekend;
6. That the mediation process that has been paid for so far by our client is given the chance to create a structured, calm and collected approach to the speedy resolution of financial and child related access issues. Our client will happily contribute towards mediation costs for Mrs Morrell to ensure this happens without her financial savings being impacted. This is a continued goodwill gesture to the mother of his children and to whom he is extremely respectful and genuinely grateful to. At all times, as indicated in our letter dated 15th June 2018, we seek to have an amicable and open

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process to prevent conflict and to keep a calm balanced approach to what for our client is a very sad situation that is not of his direct making.

We trust that the above can be agreed, to ensure that the children have some stability and security in what has been a very upsetting time for them. Once agreed, our client will stay out of the family home, pending a financial settlement, to ensure that the children have stability with him in a rental property.

Once more to affirm. Ms Gilchrist is not permitted entry to 6 Silver Meadows, Trowbridge, Wiltshire, BA14 0LF. If she attempts entry she will be trespassing and formal action will be taken to seek a court order to prevent her doing so. This is necessary to protect the children from any further exposure to sexual conduct that is wholly unacceptable and that places them in a clear position of risk.

We request a response within the next 7 days.

Yours faithfully

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email: louisemortimor@goughs.co.uk

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