

Witness Name: Selma Taha

Statement No.: 1

Exhibits: 13

Dated: 17/02/2023

UK COVID-19 INQUIRY

WITNESS STATEMENT OF SELMA TAHA, SOUTHALL BLACK SISTERS

I, Selma Taha, will say as follows: -

1. I am Executive Director of Southall Black Sisters ("SBS"). I make this statement in response to the Request for Evidence by the Chair of the UK Covid-19 Inquiry under Rule 9 of the Inquiry Rules 2006 (Reference: M1/SBS/01).
2. In accordance with the request, my statement will speak to the state of the UK's pandemic planning, preparedness and resilience, at the time that the Covid-19 pandemic struck.

Brief overview of the history, legal status and aims of the organisation

3. Southall Black Sisters (SBS) is a not-for-profit organisation which was established in 1979 to meet the needs of black and ethnic minority women. For more than four decades SBS have been at the forefront of challenging domestic and gender-related violence locally and nationally and have campaigned for the provision of proper and accountable support services to enable women and their children to escape violent relationships. Whilst SBS' focus is on the needs of black and minority women, it also assists any woman who needs emergency help, many of whom are from working-class backgrounds.
4. SBS aims to empower black and ethnic minority women and girls to escape gender based violence and assert their rights to equality, justice and freedom.

5. The legal status of SBS is a limited company registered by guarantee.
6. The work of SBS is UK wide in the form of a national helpline, strategic cases, policy and research work, and the Home Office pilot project it is helping to deliver 'Support for Migrant Victims Scheme'. However, the majority of its services are delivered locally in London, particularly in west London.
7. SBS supports primarily black and ethnic minority women, however, they will support any women in need of emergency help.
8. They support women facing Domestic Abuse, and other forms of Violence Against Women and Girls ("VAWG"). This includes migrant women, women who have immigration and No Recourse to Public Funds problems, women experiencing homelessness and those who suffer forced marriage and honour-based violence. They campaign to end violence against women in transnational spaces. Flowing from this, the women they support are commonly experiencing both physical and mental health issues. SBS support for these women is extended to their children and family, to relieve them all from the hardship they face at the hands of the perpetrator.

Failure to consider the impact on VAWG in pandemic planning and emergency preparedness

9. The government's planning, preparedness and resilience at the time Covid-19 pandemic struck betrayed a concerted lack of consideration for the potential impacts on victim-survivors of VAWG belonging to vulnerable groups such as migrant and undocumented communities.
10. This was apparent across a number of areas of the government's emergency planning and in their longstanding failure to properly attend to the needs of these groups even outside periods of emergency. The paragraphs that follow outline the extensive evidence that ought to have alerted the government to the potential impacts of their decision-making on victim-survivors of VAWG and its failure to act in a way that would mitigate the risk of harm.

Failure to anticipate the well-documented increase in VAWG in periods of crisis

11. The government's failure to identify the risk of a significant rise in violence against women in a pandemic and to sufficiently prepare for this eventuality is the amongst the issues of most serious concern to SBS that has emerged from the Covid-19 pandemic. This failure was plainly unjustified in the face of the long-standing evidence to show that rates of VAWG typically increase in periods of crisis and conflict, including wars and natural disasters. It is also well-documented that these moments of crisis aggravate pre-existing inequalities by further marginalizing already disadvantaged groups who have less access to resources that would provide greater practical resilience, such as financial reserves, flexible working, childcare, social support, secure immigration status, recourse to public funds, and access to credit.
12. A recent report by the Women's Budget Group (ST/1) states that women constitute the majority of those providing care (both paid and unpaid), the majority of health workers, are more likely to be employed in the service sector, more likely to be on zero hours contracts, and more likely to be dependent on social security and social housing. As a result, women are at greater risk of exposure to Covid-19 as key workers and more likely to be impacted by lockdown and social distancing measures.
13. This evidence ought to have been enough to alert the government to the likely increase in VAWG in the event of a pandemic, and it was plainly clear that lockdown and social distancing measures would have a particular impact on victim-survivors of VAWG as a result the reduced capacity to spend time away from perpetrators of violence and to leave the household in general.
14. This failure was apparent in the government's failure to give early warning signs to frontline support services responding to VAWG. An investigation by the Sunday Times, published on 19 April 2020, into the government's response to the pandemic reported 'a failure to give an early warning sign to private firms that there might be a lockdown so that they could start contingency planning'. The same can be said for the charity and VAWG sector. SBS were given no advanced

notice of the pending lockdown, what to expect, or guidance about how to support vulnerable groups during the lockdown. The week before lockdown was implemented, SBS had a week within which to devise, develop and implement contingency plans in the delivery of frontline services to some of the most vulnerable and isolated women and children in our society. This was not only a case of rapidly adapting to maintain our service levels as best as possible at the usual rate of referrals, but also attempting to expand our service in these conditions to attempt to accommodate the dramatic increase in referrals that we received.

15. We had to move our entire frontline service to remote working which meant suspending urgent face-to-face contact with those seeking help and assistance. This meant closing our face-to-face reception, advocacy, support group, language, outreach, training and counselling services. Moving to telephone and online services within a week has been financially and practically challenging. Only the week commencing 20 April 2020, over one month after lockdown was announced, were we able to offer our weekly outreach advice surgeries online via Facebook messenger or email, for those who could not safely contact us by telephone. All staff, and more importantly service users, had needed considerable additional support during our transition to working from home, which had added a considerable burden on our IT and technical resources. We had to absorb the additional cost required to ensure that the needs of our users were met, with varying degrees of success. These issues above stemmed from a lack of forewarning and inadequate financial support from the government for frontline service providers that supported vulnerable groups during the crisis.

Failure to consider pre-existing inequalities and vulnerabilities in decision making (including ignoring well-documented evidence of impacts of harmful policies)

16. The specific vulnerabilities and barriers that women from black and ethnic minority communities and migrant women with insecure immigration status face pertaining to gender-based violence did not inform the government's pandemic planning and emergency preparedness. This was apparent from the lack of action in response to the well-documented evidence of the impacts on women from

these communities of harmful policies such as public sector data-sharing with immigration enforcement, NHS charging policy for people subject to immigration control, no recourse to public funds (NRPF) conditions, and public spending cuts. These ought to have been reviewed before the pandemic struck, and proper consideration given to the increased risk of harm to women from these communities as a result of these policies in the event of a pandemic.

Public sector data-sharing with immigration enforcement

17. In 2018, Liberty and SBS launched the first ever police Super-Complaint (ST/2). The Super-Complaint concerned the fact that the police share the data of victims and witnesses of crimes with the Home Office for immigration enforcement purposes. The data-sharing includes all victims, even those who are victims of extremely serious crimes such as rape, modern slavery and human trafficking. Immigration data sharing obligations also apply across several public services including the NHS, schools, housing and emergency services. This policy relates to VAWG as, for instance, healthcare appointments may represent the 'one chance' that migrant women have to speak to a professional and disclose abuse, but too many are deterred from accessing these services due to fear of immigration enforcement. One consequence of immigration surveillance in the NHS is the increased likelihood of migrant women being trapped in abuse because a key route to reporting that abuse – through health services – is not available to them. This undermines the fight against crime as it has a real deterrent effect on people with insecure immigration status seeking the support of the police. As a result, victims are unable to access justice while perpetrators remain free to commit further crimes and threaten public safety.
18. During the Covid-19 pandemic crisis, abused migrant women were further obstructed from escaping abuse due to the embedding of immigration surveillance in all public and essential services, including healthcare, schools, housing, and emergency services. This could have been avoided had concerns around data sharing of victims and witnesses of crimes with the Home Office for immigration enforcement purposes been taken seriously, as repeatedly recommended by organisations like Southall Black Sisters.

Dismantling the 'hostile environment'

19. The collection of immigration policies typically known as the 'hostile environment' create serious barriers to migrant women seeking urgent help from statutory services. These include the NHS Charging Regulations, the Right to Rent policy, NRPF conditions and others. As discussed above, these policies create a state of precarity for migrant women and puts them at greater risk of domestic abuse and isolation, as well as preventing them from seeking urgent assistance. In the context of the Covid-19 pandemic, this also creates a substantial public health risk if migrant women are deterred from seeking healthcare and housing support.

NHS Charging Regulations and section 39 Immigration Act 2014

20. Whilst Covid-19 was placed on the list of exempt conditions for NHS charging, this is not sufficient to ensure equitable access to healthcare, as evidence shows that the existence of healthcare charging and ID checking in and of itself will deter migrant populations from seeking help. For example, there is evidence that the current NHS charging policy has a deterrent effect on people with tuberculosis which resulted in delays to diagnosis, despite tuberculosis being an exempt condition (ST/3). This is not only a public health issue in that diagnostic delays of Covid-19 cases could lead to greater spread of the virus and serious risk to the health and lives of affected patients, but once again also creates a barrier to accessing healthcare appointments which provide the opportunity for victim-survivors to disclose abuse.

Public-spending cuts from 2010 onwards

21. The detrimental impact of austerity policies and public spending cuts from 2010 onwards have been well reported. Funding for services responding to VAWG reduced dramatically across the UK from both central and local government sources, as shown in the 2018 report of Women's Resource Centre (ST/4). Simultaneously, public spending cuts to statutory services and social security have increased the demand on the voluntary sector and created additional barriers for many victim-survivors of VAWG, for example increased financial

precarity. The move away from local and national grants to competitively tendered-for contracts to deliver services and the short-term nature of many contracts and grants are of further detriment to smaller by-and-for organisations like SBS.

22. As a result of the shortfall in funding, refuges were already unable to cope with existing levels of demand prior to the pandemic. For example, in 2018-19, 64% of referrals to refuges in England were declined. Provision of safe alternative accommodation for migrant women was even worse. In the same year, only 5% of refuge vacancies listed could accommodate women with NRPF. This is precisely why SBS has long had to resort to housing incredibly vulnerable women in B&B accommodation as an emergency measure. The shortfall of funding has a disproportionate impact on women from black and minority ethnic communities and migrant women with insecure immigration status as a result of the lack of ringfenced funding for specialist services. This is one of the clearest indicators of the government's lack of preparedness for the impact of the Covid-19 pandemic on VAWG. The government has demonstrated time and again its lack of willingness to adequately support services responding to VAWG even in the absence of a national crisis. As such, it follows that the government did not adequately prepare for the necessary funding that would be required to respond to the dramatic increase in VAWG that followed as the Covid-19 pandemic struck.

No recourse to public funds conditions

23. SBS has been campaigning for reform of NRPF conditions for 30 years. A substantial proportion of persons with NRPF are single women or women with dependent children. Between 2013 and 2015, over 50,000 individuals with dependents were granted leave to remain in the UK, with the NRPF condition attached. The failure of the government to suspend the No Recourse to Public Funds (NRPF) condition and 'hostile environment' immigration policies impacted on the most vulnerable women and children creating not only a public health crisis but also heightening the risk of abuse for vulnerable migrant women and children during the pandemic. The government certainly could have been better prepared, as there was extensive evidence available on VAWG in black and minority ethnic

communities, and the particular vulnerability of women with NRPF conditions. The report 'Safe and Secure: The No Recourse Fund Report of Findings' was provided to the government in 2019 (and made available to the public in 2020) (ST/5). There was also substantial discussion of NRPF conditions in relation to the Domestic Abuse Bill and SBS published briefing papers on the subject in March 2019 (ST/6) and March 2020 (ST/7). In light of this evidence, it is inexcusable that the government did not consider the disproportionate impact that non-pharmaceutical interventions, such as lockdown and social distancing, would have on women with NRPF and take mitigating action to pre-empt and protect them from harm.

Inclusion of the Domestic Abuse Commissioner and Victims' Commissioner in all relevant planning and coordination groups

24. The Domestic Abuse Commissioner and Victims' Commissioner ought to have been included in all relevant planning and coordination groups, particularly the Covid-19 ministerial group and relevant COBRA meetings. Every relevant Secretary of State should have received instructions to ensure that the interests of survivors of VAWG were represented at all levels of departmental Covid-19 response planning and including the prevention of increased levels of VAWG among their priority objectives.

Engaging with existing expertise and resources to provide meaningful protection for migrant women.

25. The government ought to have engaged with the VAWG sector, academic and thematic experts, and the wealth of resources already published on the subject of domestic abuse and its particular impact on migrant women to ensure that legislative opportunities for protecting migrant women are not missed. As discussed above, these could have included review and repeal of hostile environment policies including NRPF conditions. The crisis also presented even stronger evidence for extension of the Domestic Violence Indefinite Leave to Remain (DVILR) and Destitution Domestic Violence Concession (DDVC) to all migrant victim-survivors of abuse and extending the time period from three

months to six months, and for the creation of a legal 'firewall' between domestic abuse services and immigration control. The crisis also highlighted the need for ringfenced funding for specialist services for migrant women facing VAWG which SBS and many other organisations have campaigned for over many years.

Actions which should have been taken to improve UK pandemic planning and emergency preparedness

26. The UK pandemic planning and emergency planning fell short in a wide range of areas. SBS suggests four key areas for improvement:
- a) review of the policies outlined above that have a harmful and disproportionate impact on women, in particular those from black and minority ethnic communities and migrant women with insecure immigration status
 - b) consultation with expert organisations during emergency and resilience planning
 - c) Inclusion of the Domestic Abuse Commissioner and Victim's Commissioner in all relevant planning and co-ordination groups
 - d) engaging existing expertise and resources to provide meaningful protections for migrant women.
27. We make these suggestions as those which present most prominently in our work, though this list should not be considered exhaustive.

Review of policies that have a harmful and disproportionate impact on women, in particular those from black and minority ethnic communities and migrant women with insecure immigration status

28. The specific vulnerabilities and barriers that women from black and ethnic minority communities and migrant women with insecure immigration status face pertaining to gender based violence should have informed the government's

pandemic planning and emergency preparedness. This includes a review of policies discussed above, such as:

- Public sector data-sharing of immigration enforcement data
- NHS Charging Regulations and section 39 Immigration Act 2014
- Public-spending cuts from 2010 onwards
- No recourse to public funds conditions

Consultation with expert organisations during emergency and resilience planning

29. Evidence should have been requested and collected from thematic experts on public health crisis preparedness and suggested course of action. Expert organisations like SBS, who work on the frontline, must be involved in the decision-making process if those decisions are likely to impact those they support. Indeed this is normal practice, with SBS regularly consulted by government bodies. The practice of government plans being scrutinised by expert organisations like SBS is of vital importance and should naturally have been extended to consultation around pandemic issues. This would reduce the likelihood of omissions in decision-making from government, and would help government mitigate any harmful impacts of, for example, non-pharmaceutical interventions.
30. This co-working on a pandemic response would enable forward-thinking on protection and provision for those SBS support. This would benefit central government decision-making, but also the decisions of public bodies in general. As those SBS supports have overlapping-issues, consultation with organisations supporting domestic abuse survivors should come hand-in-hand with consulting other experts in the fields of migrant rights, black and ethnic minority rights and housing, to name but a few. Prior to the Covid-19 pandemic, it would have been good practice to consult SBS and similar experts on national plans for a pandemic. Now the Government has the opportunity to consult with SBS to learn lessons for the handling of any future pandemic – we hope this opportunity will be used to its fullest.

Ensuring decision-making is lawful e.g. Public Sector Equality Duties (“PSED”)

31. SBS understands that the Government had to make many significant decisions in a short period of time, certainly at the beginning of the pandemic. This does not however reduce the obligation to adhere to PSED and the Equality Act 2010. We anticipate that Module 2 will reveal these were not adhered to at all times. If that is the case, and in order to ensure that this is not repeated in the event of a future pandemic, SBS’s position is that an expert in PSED should be brought on-board to scrutinise the planning and preparedness of the government before and during crucial periods of the pandemic.

Planning for emergency allocation of extra resources to frontline organisations, public services and local authorities in-line with government decision making

32. At the beginning of the pandemic, SBS’s existing staff had to absorb the substantive extra workload which came with the increase in domestic abuse – many suffered burnout as a result. We were only able to hire the much-needed extra staff in the latter half of 2020, when emergency funding became available. The need for extra resources arose from the pandemic, but also from government decision-making in that government had failed to anticipate and plan for the rise in domestic abuse. Yet, the government did not provide extra resources and funding to organisations like SBS at a time when they were relied on to continue providing vital services. In the future, funds should be made available to frontline organisations as soon as government has knowledge of an impending public health crisis to allow them to quickly expand services in said crisis.
33. SBS deal with local authorities and public services on a daily basis through their casework. It is as a result of this experience, we say the question of sufficient funding must be extended to these bodies, if survivors are to be properly considered. The pandemic arrived after a long period of austerity in which public services and local authorities were starved of resources. Prior to the

pandemic, survivors supported by SBS routinely struggled to access safe and secure housing. Survivors struggled to access immigration services, health services, social services, welfare provisions and the justice system. These existing problems, relating to systemic underfunding, do not appear to have been considered in government decision-making leading to an escalation of these issues during the pandemic.

Monitoring, working with and learning from the international community during a public health crisis.

34. Strong ties and communication with the international community should have been present throughout government decision-making prior the pandemic. This would have benefitted those who SBS support by providing support services in both the public and charity sector with greater expertise on how to support VAWG survivors during times of crises, and in particular in response to the global Covid-19 pandemic. It is SBS's view that, should there be a future pandemic, analysis and greater communication with the international community would benefit government decision-making, and crucially, the women and girls they support.

SBS' engagement with government in relation to emergency preparedness and pandemic planning

35. SBS had no emergency preparedness or pandemic planning engagement with local or central government prior to January 2020.
36. In the absence of any urgent, coordinated response from the government to address VAWG in the context of the Covid-19 pandemic, SBS issued a legal challenge against the Secretary of State for Housing, Communities and Local Government in April 2020 on the basis of their failure to take sufficient steps to protect women and children, contrary to its obligations under the Human Rights Act 1998 and Equality Act 2010. In response to this challenge, the government announced additional funding (£76 million) for charities responding to VAWG. However, this funding excluded women with NRPF status and made no

commitment to ringfence funding for specialist BME services that were disproportionately impacted by the effects of the Covid-19 pandemic.

37. SBS also contributed to the United Nations High Commission for Human Rights inspection in relation to Covid-19 and VAWG. SBS also launched a campaign 'My Life Under Lockdown' which highlighted the experiences of survivors of domestic abuse during national lockdowns.

38. SBS sent the following correspondence directly to the UK government in writing:
 - a) Letter regarding Covid-19 – Measures Urgently Required to Protect and Support Domestic Abuse Survivors, to Robert Jenrick Secretary of State for Housing, Communities and Local Government dated 31 March 2020 , on behalf of Solace Women's Aid and signed by 58 other groups and individuals including SBS (ST/8).

 - b) Open letter regarding Covid-19 pandemic and preventing and responding to an increase in violence against women and girls, to Prime Minister Rt Hon Boris Johnson MP dated 3 April 2020, cc'ing Chancellor of the Exchequer, Home Secretary, Secretary of State for Housing, Communities and Local Government, Secretary of State for Justice, Secretary of State for Work and Pensions, Secretary of State for Health and Social Care, Secretary of State for Education, Minister for the Cabinet Office and signed by 21 organisations tackling VAWG including SBS (ST/9). A response was not received until October 2020.

 - c) Pre-action letter to Secretary of State for Housing, Communities and Local Government dated 27 April 2020, sent by Public Interest Law Centre on behalf of SBS and Solace Women's Aid (ST/10). A response was received to this and the substantive pre-action letter on 12 May 2020 (ST/11).

39. SBS also attended several meeting with public bodies during the period of January 2020 to February 2022 at which we raised concerns in relation to the relationship between the Covid-19 pandemic and VAWG. It is important to note

that the focus of the meetings that SBS attending during this period were not always specifically related to the impact of the pandemic, rather about the impact of abuse more generally. However, the impact of the pandemic was naturally raised as part of these discussions, but not necessarily reflected in the corresponding agendas or minutes.

40. The meetings SBS attended during this period are as follows:
- a) Meetings with MOPAC, on 16 and 20 April 2020
 - b) Meeting with the Shadow Justice Minister, on 7 May 2020
 - c) Evidence given in meeting with the Domestic Abuse Bill Committee, on 4 June 2020
 - d) Evidence to the All-Party Parliamentary Group ('APPG') on domestic abuse on 11 June 2020
 - e) Roundtable discussion with Equality And Human Rights Commission EHRC on 22 June 2020
 - f) Advisory group with the Victims Commissioner on 13 July 2020, 2 December 2020, 12 April 2021 and 4 July 2021
 - g) Meeting with Domestic Abuse Commissioner Office on 27 July 2020, 21 April 2021, 25 May 2021, 26 January 2022
 - h) Meetings with Ministry of Justice on 28 Aug 2020 and 10 September 2020
 - i) Presentation to the House of Lords on migrant women on 22 September 2020
 - j) Presentation to the UN Human Rights Council on 28 October 2020
 - k) Roundtable with Victoria Atkins – Safeguarding Minister on 21 October 2020
 - l) Meeting with the Mayor of North East London on 27 November 2020
 - m) Meeting with Home Office regarding forced marriage on 28 January 2021
 - n) Meeting with Home Office regarding firewalls on 14 May 2021, 12 August 2021, 28 September 2021, 31 October 2021 and 4 November 2021
 - o) Meeting with Home Office on the role of migrant commissioner on 15 May 2021
 - p) Evidence given in a meeting with the APPG on domestic abuse on 24 May 2021

- q) Home Office VAWG stakeholder group on 25 July 2021, 14 October 2021, 25 January 2022
- r) Round table discussion with Victim's Commissioner on family law on 20 July 2021
- s) Roundtable discussion with Domestic Abuse Commissioner on family law on 3 Sept 2021
- t) Roundtable discussion with the Greater London Authority (Police and Crimes Committee) on 3 Dec 2021
- u) Meeting regarding migration with the APPG on 30 March 2022

Articles and reports published or contributed to by SBS

41. From January 2020 onwards, SBS were active in contributing to articles, publications and reports:
- a) SBS written evidence to the Women and Equalities Committee on Unequal Impact: Coronavirus (Covid-19) and the Impact on People with Protected Characteristics- May 2020 (ST/12)
 - b) Letter, on behalf of SBS and Solace Women's Aid regarding Covid-19 – Measures Urgently Required to Protect and Support Domestic Abuse Survivors, dated 31 March 2020
 - c) My Life Under Lockdown SBS campaign
 - d) Press release - SBS and Women's Charities Urge Government to Help Women and Children Escape Abuse – dated 11 April 2020
 - e) Domestic violence funding legal challenged launched, article in the New Statesman – dated 27 April 2020
 - f) Letter to Prime Minister Boris Johnson and (then) Home Secretary Priti Patel to demand a public inquiry into the handling of the Covid-19 crisis, co-signed by SBS – dated 09 April 2020
 - g) Southall Black Sisters & Solace launch COVID-19 Crisis Project to Create Urgently Needed Safe Housing for Women Fleeing Domestic Abuse, article dated 12 May 2020

- h) Submission to Home Affairs Select Committee: (Home Office preparedness for Covid-19 (Coronavirus): domestic abuse and risks of harm within the home – dated April 2020 (ST/13)
- i) SBS submission to United Nations High Commissioner for Human Rights - 24 June 2020
- j) BME domestic abuse charity sees highest volume of calls for help in 40-year history during lockdown, article in the Evening Standard – dated 16 June 2020
- k) Vulnerability Knowledge and Practice Programme (VKPP) Domestic Homicides and Suspected Victim Suicides During the Covid-19 Pandemic 2020-2021 report, contributed to by SBS – dated 25 August 2021
- l) 'I have five minutes and I need help': Life on the domestic abuse frontline during coronavirus, article in the Telegraph – dated 18 April 2020


Other organisations that may hold relevant information

- 42. We consider that Solace Women's Aid, Refuge and Imkaan hold a substantial volume of relevant information and material in relation to this request for information as other services for victim-survivors of VAWG that have experienced similar.
- 43. To summarise, SBS hold the view that the government's emergency planning was entirely lacking in its approach to mitigating the risk of VAWG and to ensuring that support services are available to victim-survivors, in particular women from black and minority ethnic communities and migrant women. This is informed by the government's long-standing failure to fund support services for VAWG since 2010, the complete lack of engagement with VAWG services in relation to emergency planning before the Covid-19 pandemic struck, and a continued insufficient engagement with services in relation to lockdown and social distancing measures. The government's failure to review policies which disproportionately create precarity and barriers to accessing statutory and support services for migrant women betrayed a laissez-faire attitude to the risk of harm to these communities and increased public health risk created by barriers to healthcare. In the absence of this planning, SBS was forced to fill the

gap in planning and strategizing to support these groups and to absorb significant financial costs to respond to the challenging conditions of NPIs and increased demands, further straining our already inadequately funded service.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings 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 of its truth.

Signed:  _____

Dated: 2/17/2023 _____