

Witness Name: Des Clifford

Statement No: 2

Exhibits: 39

Dated: 05/12/2023

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**UK COVID-19 PUBLIC INQUIRY**

**WITNESS STATEMENT OF DES CLIFFORD**

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I provide this statement in response to a request under Rule 9 of the Inquiry Rules 2006 dated 14 February 2023 and referenced M2B/WG/CJD/01.

I, Des Clifford, will say as follows: -

**Preface**

1. I extend my deepest sympathies to those who have lost loved ones and those who have suffered during the pandemic and because of the pandemic.
2. In preparing this statement I have relied on advice and information from Piers Bisson, who is the Director of the European Transition, Constitution and Justice Directorate. The following members of Piers' team have supported him with the provision of information for this statement:
  - a. NR and Sophie Brighthouse, whose roles are described below and who assisted with material relating to the Coronavirus Act and intergovernmental relations, and, in the case of Chris, also with material relating to preparations for the Senedd election in May 2021;
  - b. NR who was and remains the Head of the Welsh Tribunals Unit and assisted with material relating to the operation of the devolved Tribunals;
  - c. Emma Alexander, who worked on the preparations for the Senedd election in May 2021 and assisted with material relating to that part of the statement.

## **Background**

3. I have worked in the Welsh Government since 1999. My professional background is as a civil servant with particular expertise in First Minister's private office and EU Affairs. During the period in question, I was DG for the Office of the First Minister. My primary focus in normal circumstances was managing the implications for the Welsh Government of Brexit; like many colleagues my attention and energy was diverted towards assisting with Covid-19 work.
4. This statement relates to the period from 21 January 2020 until 30 May 2022.

## **Description of role, function, and responsibilities of CJD**

5. Throughout the specified period, the directorate was called the European Transition, Constitution and Justice (ETCJ) Directorate. The ETCJ directorate's role in the Welsh Government during the specified period was focused on:
  - a. Strategy and coordination of the Welsh Government's work relating to the UK leaving the EU, and shared responsibility with the International Relations Directorate for the operation of the Welsh Government's Brussels Office;
  - b. Constitutional issues, including the operation of the devolution settlement, UK Government Bills, intergovernmental relations within the UK, and Senedd elections policy, including planning and legislation for the ordinary general election scheduled for May 2021;
  - c. Operational administrative support for six devolved Welsh Tribunals; and
  - d. Justice policy, following on from the Commission on Justice for Wales report in 2019 (recognising that justice is, at present, largely reserved to the UK Parliament).
6. The ETCJ Directorate had oversight of intergovernmental relations with the UKG and the other devolved governments, though specific channels of engagement were established for the Covid-19 work which the directorate was not involved in directly, and which are covered in the statements from relevant other parts of the Welsh Government.

7. The main emergency response measures which the ETCJ directorate had an involvement in were:
  - a. The process for granting legislative consent for the Coronavirus Act 2020, and the provisions for Senedd elections and for the devolved Welsh Tribunals within that Act;
  - b. Planning and legislation for the Senedd election in May 2021; and
  - c. Administrative support for the adapted ways of working for the devolved Welsh Tribunals (i.e. their move to virtual hearings).
8. I describe each of these issues in more detail below.
9. The ETCJ Directorate did not have broader responsibility for emergency response work, though members of staff from the Directorate were redeployed temporarily or permanently to other areas of the Welsh Government (e.g. to work in the Emergency Coordination Centre, or in teams advising on regulations and guidance and recovery work).
10. More broadly, the Directorate faced the same challenges as other parts of the Welsh Government in adapting its work to reflect the evolving circumstances of the pandemic (such as working from home and critical resourcing challenges, with intensive, sustained workloads and depleted staffing levels) and ensuring compliance with public health regulations and guidance in Wales (and, in respect of activity led by the Brussels Office, regulations and guidance in Belgium).

#### **Structure of the division, Ministers, and key officials**

11. The structure of the directorate was fluid and evolved over time. I exhibit at **DCM2BCJD01/01-INQ000350623** an organogram illustrating the structure of the division at a 'mid-point' in Spring 2021. Piers Bisson was director throughout. In the first few months of the pandemic Hugh Rawlings also had a director role within ETCJ, advising on constitutional matters but without direct line management responsibility for any of the divisions in ETCJ. In addition, at the beginning of the specified period, Simon Brindle was a Director in the directorate; his role was focused on European Transition matters and he left the directorate in May 2020.

12. At Ministerial level, the directorate advised the First Minister (Mark Drakeford MS) in areas of its responsibility. Until May 2021, when roles changed following the Senedd election, the directorate also advised the Counsel General and Minister for European Transition (Jeremy Miles MS) on relevant areas. After that point, the directorate advised the Counsel General and Minister for the Constitution (Mick Antoniw MS). The directorate also advised the Minister for Housing and Local Government (Julie James MS) on the Welsh Elections (Coronavirus) Act 2021.

13. The key officials during the specified period were:

- a. Piers Bisson, Director of ETCJ throughout the specified period
- b. Hugh Rawlings, a director with responsibility for constitutional advice, until July 2020
- c. Simon Brindle, a director with responsibility for certain European Transition matters, until May 2020.
- d. James Gerard, Deputy Director for Justice Policy throughout the specified period (though who worked on matters relating to the pandemic which were outside of the directorate's direct responsibilities for part of this period).
- e. Ed Sherriff, Deputy Director for European Transition Negotiations and Preparedness, until July 2021. This post was not filled following Ed Sherriff's departure.
- f. Sophie Brighthouse, who was Acting Deputy Director for European Transition Policy from September 2020 until July 2021, in succession to Georgina Haarhoff, who held the role until June 2020.
- g. NR who was Deputy Director for European Transition Legislation at the start of the specified period, and who took on responsibility for certain other parts of European Transition work after the departure of other deputy directors.
- h. Chris Warner, who was the Deputy Director for Constitution and Justice until January 2022. Emma Alexander became Acting Deputy Director for Constitution and Justice subsequent to his departure (none of the matters covered in this statement relate to Emma's Deputy Director responsibilities for the period in question).
- i. At the beginning of the specified period, Liz Lalley was the Deputy Director for European Transition Preparedness, but moved into her Covid-19 role in the early months of the pandemic. I understand that Liz Lalley describes this transition in her statement in response to M2B-LL-01, so I do not repeat it here.

14. In relation to the devolved Welsh Tribunals, line management responsibility for the head of the Welsh Tribunals Unit rested with the Deputy Director for Constitution and Justice, but responsibility for the specific operating arrangements of the Tribunals as a judicial function rested (and continues to rest) with the President of the Welsh Tribunals and with the relevant President for each Tribunal. Sir Wyn Williams was the President of the Welsh Tribunals throughout the specified period. I describe the role of the Welsh Tribunals, and the impact of the pandemic on the operation of the devolved Welsh Tribunals below.

### **Role of ETCJ in the Welsh Government's response to Covid -19**

#### **Legislative consent for the Coronavirus Act 2020 ('the 2020 Act')**

15. When a Bill is introduced to the UK Parliament which contains provisions which would be within the legislative competence of the Senedd, or would change the Senedd's legislative competence, the Senedd is asked to give its legislative consent to the relevant provisions, and the Senedd's Standing Orders set out the process for doing so, by means of the laying of legislative consent memorandums and the tabling of motions.
16. Lead policy divisions in the Welsh Government are responsible for advice to Ministers on UK Government Bills, including advising on and seeking clearance for legislative consent memorandums and motions. However, the Directorate holds policy responsibility for the legislative consent process more widely as part of its remit for constitutional affairs, and therefore supports officials as they draft Ministerial advice on legislative consent issues. In that role, the Directorate was involved in the process leading up to the Senedd granting legislative consent to the Coronavirus Act 2020 but did not lead on that Bill overall.
17. I understand that the legislative consent process is described in more detail in the statement of Helen Lentle in response to M2B-WG-01, and that her statement refers specifically to the legislative consent process for the Coronavirus Act, so I have not set this out again here.
18. The Directorate had no role in decisions about the use of the powers in the Public Health (Control of Disease) Act 1984 and/or the 2020 Act in response to the pandemic.

I understand that matters relating to decisions about the use of these powers is covered by the First Minister in his statement in response to M2B-WG-01.

#### Planning and legislation for the Senedd Election in May 2021

19. As indicated, the Directorate led in advising Ministers on preparations for the Senedd election in May 2021. These coincided with the elections of Police and Crime Commissioners, which were the responsibility of the UK Government.
20. This work included establishing an Elections Planning Group in summer 2020, which produced a report which was considered by the Welsh Government Cabinet in October 2020. I exhibit the Cabinet paper and the minutes of the Cabinet meeting at **DCM2BCJD01/02-INQ000349935** and **DCM2BCJD01/03-INQ000129903**. The report was then published via a Written Statement to the Senedd on 6 November 2020; I exhibit the Statement and the report at **DCM2BCJD01/04-INQ000350624** and **DCM2BCJD01/05-INQ000350557**. A debate was then held in the Senedd on 17 November 2020. I exhibit the transcript at **DCM2BCJD01/06-INQ000350625**.
21. This led to the development of the Welsh Elections (Coronavirus) Act 2021 ("the 2021 Act"), which was introduced to the Senedd on 21 January 2021, was agreed by the Senedd on 10 February 2021, and received Royal Assent on 16 March 2021.
22. To support the effective delivery of the election, a Senedd Election Operations Group (SEOG) was established in early 2021 to monitor progress and provide assurance to Ministers on preparations for the election. I exhibit the Terms of Reference at **DCM2BCJD01/07-INQ000350626**. SEOG met on nine occasions; the first meeting took place on 5 February 2021 and the final meeting on 19 May 2021.
23. At its meeting on 10 March 2021, SEOG considered a CMO and TAC evidence paper entitled 'CMO and TAC evidence paper: Considerations to mitigate risk of increased COVID-19 transmission during the Senedd and Police and Crime Commissioner elections' which outlined the behavioural, environmental, and modelling considerations relevant to the Senedd and Police and Crime Commissioner elections, and how to mitigate the risk of increased Covid-19 transmission. I exhibit the paper at **DCM2BCJD01/08-INQ000227566**, and the action points from the meeting at **DCM2BCJD01/09-INQ000350627**. The papers and discussion at this meeting

informed the second review of the preparations for the holding of the 2021 poll for the Senedd ordinary general election, completed on 12 March (see para 27 below).

24. Following the discussion at SEOG on 10 March, a final version of 'Considerations to mitigate risk of increased COVID-19 transmission during the Senedd and Police and Crime Commissioner election' was published on 19 March 2021. I exhibit the paper at **DCM2BCJD01/10-INQ000312097**. The paper was discussed again at a meeting of SEOG on 24 March 2021, enabling specific issues identified in the paper to be considered by the group as necessary, in the context of operational guidance and arrangements developed by organisations involved in delivering the election. I exhibit the agenda at and the action notes at **DCM2BCJD01/11-INQ000350572**. I also exhibit a letter from the Deputy Chief Medical Officer to Regional Returning Officers regarding lateral flow tests for polling station and count staff, which issued following discussion at that meeting, at **DCM2BCJD01/12-INQ000350573**.
25. Section 6 of the 2021 Act required the Welsh Ministers to publish the criteria to be used by the First Minister for determining whether it was necessary or appropriate to postpone the poll for the 2021 election. These criteria were set out in a Written Statement issued by the Minister for Housing and Local Government on 5 March 2021, which I exhibit at **DCM2BCJD01/13-INQ000350568**.
26. Section 15 of the 2021 Act required the Welsh Ministers to carry out reviews of the preparations for the holding of the poll for the 2021 election, with the first review taking place by 19 February 2021, and subsequent reviews taking take place at least once in each subsequent period of 21 days, until the poll for the 2021 election is held. The 2021 Act also required the Welsh Ministers to lay before the Senedd, as soon as reasonably practicable after a review, a statement summarising the review and stating whether any postponement of the 2021 election was anticipated.
27. As an example, I exhibit at **DCM2BCJD01/14-INQ000145540** the advice which was submitted for the second review, and I exhibit at **DCM2BCJD01/15- INQ000350600** the Ministerial statement. The Ministerial Advice included the CMO/TAG paper referred to at paragraph 23 above, and the outcome of correspondence and subsequently a meeting on 3 March between the Minister for Housing and Local Government and Regional Returning Officers. That meeting concluded that the preparations being made meant that unless there was clear advice to the contrary from Chief Medical Officer, the elections could be held with a reasonable degree of confidence on

deliverability, whilst acknowledging that risks would remain (which are set out in the MA).

28. To try to minimise the risks associated with participating in the election, campaigning guidance was prepared, published, and reviewed (as required by section 9 of the 2021 Act), in line with the wider 21-day reviews of the coronavirus regulations. I exhibit at **DCM2BCJD01/16- INQ000350499** an example of the campaigning guidance.
29. In addition, as part of the regular review of the coronavirus regulations, the First Minister agreed on 8 April 2021 via MA/FM/1541/21 to an amendment to the Health Protection (Coronavirus Restrictions) (No. 5) (Wales) Regulations 2020 which required any person involved in campaigning activity to take all reasonable measures to minimise the risk of any person involved in the activity being exposed to coronavirus, and the spread of coronavirus by any such person; and to have regard to any guidance about them issued by the Welsh Ministers. I exhibit the Ministerial Advice at **DCM2BCJD01/16a- INQ000176842**. All published Welsh Government guidance has been disclosed to the Inquiry.
30. Several measures were put in place for the running of the elections which aligned with wider public health advice, such as in relation to social distancing and the use of one-way systems, the use of face coverings, and availability of hand sanitiser, as reflected in guidance from the Electoral Commission. I exhibit an example of their advice at **DCM2BCJD01/17- INQ000350634**.
31. The CMO also wrote to those shielding to raise awareness of ways to vote other than in person. I exhibit the letter at **DCM2BCJD01/18- INQ000350300**.
32. At its final meeting on 19 May 2021, SEOG reviewed the election arrangements to identify things which had worked well and those where further consideration would be helpful for future learning. I exhibit the note of the meeting, which summarises the discussion, at **DCM2BCJD01/19- INQ000350628**. A lessons learned exercise was also carried out in relation to the Welsh Elections (Coronavirus) Act 2021, which I exhibit at **DCM2BCJD01/20-INQ000066552**, and which has previously been shared with the Inquiry. The Electoral Commission undertook a review of the 2021 Senedd election, which I exhibit at **DCM2BCJD01/21- INQ000350629**.
33. During the specified period, regular discussions took place at official level with the UK Government and the Scottish Government in relation to elections matters including the



Senedd Election in May 2021. These discussions took place in, for example, a 'Four Nations Strategy Group' at Director level which met around quarterly and a 'Four Nations Working Group' which met more frequently. Issues discussed included various pieces of elections related legislation (e.g. UK Government Bills on Elections and on the Dissolution and Calling of Parliament, and Welsh Government legislation in respect of Local Government) and plans for the 2021 elections including in relation to campaigning guidance and the holding of the elections.

34. As examples, I exhibit at **DCM2BCJD01/22- INQ000350610** the note of the Four Nations Strategy Group held on 10 May 2021, and at **DCM2BCJD01/23- INQ000350313** the note of the Four Nations Working Group held on 24 March 2021.

35. Discussions with UK Government at official level also considered the implications of its decision to postpone the election of Police and Crime Commissioners from 2020 to May 2021 resulting in a combined poll. The UK Government indicated that it was not intending to make changes to the operation of the Police and Crime Commissioner election which would require primary legislation, which had implications for potential actions and issues considered in respect of the Senedd Election.

#### Devolved Welsh Tribunals

36. Although most aspects of justice are reserved, there are six devolved tribunals, the administration of which is the responsibility of the Welsh Tribunals Unit. The six devolved tribunals are:

- Mental Health Review Tribunal for Wales (MHRTW)
- Special Educational Needs Tribunal for Wales (SENTW)
- Adjudication Panel for Wales (APW)
- Welsh Language Tribunal (WLT)
- Residential Property Tribunal for Wales (RPT)
- Agricultural Land Tribunal Wales (ALT)

37. Each tribunal has its own legislation governing the rights of appeal and the holding of hearings.

38. Whilst the Welsh Tribunals operate independently of the Welsh Ministers, they are administered by Welsh Government staff. The Welsh Ministers have functions in relation to the appointment and remuneration of members and the making of procedural rules although some of these functions for some tribunals remain with the Lord Chancellor. The office of President of Welsh Tribunals (PWT) was established under the Wales Act 2017 with statutory functions to make appropriate arrangements for the training, guidance and welfare of members of the Welsh Tribunals within the resources made available by the Welsh Ministers.
39. In 2020 the Welsh Tribunals Unit had approximately 30 full time equivalent members of administrative staff; these administrative staff are civil servants employed by the Welsh Government and in 2020 were based at three office locations. It had circa 250 members of the judiciary, one of whom was salaried (four days per week) and the rest of whom were fee paid. These are a mix of legal and non-legal members.
40. From week commencing 16 March 2020, the administrative staff started working from home and in-person hearings were halted, with the last in-person hearings taking place the following week. This decision, and subsequent decisions regarding the conduct of hearings, were taken by the PWT and the Presidents of the individual Tribunals. I am advised that there are no records of these decisions; at the time, quick decisions were being taken verbally and the need to share information quickly resulted in no written record being made. In the early part of the lockdown, meetings were held on an almost daily basis to ensure staff, judicial and user safety and to develop alternative operational arrangements.
41. I exhibit at **DCM2BCJD01/24- INQ000349144** the President's first annual report dated 31 March 2019, which includes detailed information about the Tribunals estate, and the Presidents of the individual Tribunals. I also exhibit at **DCM2BCJD01/25- INQ000349678** and **DCM2BCJD01/26- INQ000350566** the President's second and third annual reports, dated 30 April 2020 and 30 April 2021, which provide updates to the first annual report, and describe the impact of the pandemic on the Tribunals, and the operational changes which were made in response.
42. On 19 March 2020 Ministers agreed to pursue amendments to the Coronavirus Bill to enable MHRTW to fulfil its statutory duties during the pandemic. These amendments became paragraphs 11-13 of Schedule 8 to the Coronavirus Act 2020, which received Royal Assent on 25 March 2020. I exhibit the advice at **DCM2BCJD01/27- INQ000336306**.

43. The MHRTW held its first remote, online hearing on 26 March 2020. To support this new way of working, practice directions were developed for this Tribunal, SENTW and RPT over the coming months. These were approved by the First Minister, via MA/FM/1146/20 (MHRTW), MA/FM/1907/21 (SENTW), and MA/FM/2131/20 (RPT). I exhibit these MAs at **DCM2BCJD01/28-INQ000176791**, **DCM2BCJD01/29-INQ000145491**, and **DCM2BCJD01/30- INQ000145497**. The First Minister subsequently received updates on the administration of the Welsh Tribunals; I exhibit an example at **DCM2BCJD01/31- INQ000350630**.
44. During the specified period, the Welsh Tribunals Unit (on behalf of Welsh Government) did liaise with the UK Government's Ministry of Justice (MoJ) about a hardship scheme for fee-paid judicial office holders who may have been facing financial hardship as a result of the cancellation of hearings due to the Coronavirus pandemic. The WTU also contacted the MoJ to seek contact with 'Kinly', the company supplying the virtual court rooms for the MoJ; 20 virtual hearing rooms were then created for the devolved Tribunals in April 2020.
45. No formal reviews or lessons learned exercises were undertaken by the Welsh Tribunals Unit, but Judicial leads have continued to be in contact with their counterparts in the non-devolved tribunals in relation to feedback from users. These discussions have not been recorded.

### **Role of ETCJ in other Covid-19 related matters**

#### **Non-pharmaceutical interventions**

46. Decision making by Welsh Ministers in respect of the Senedd Election in May 2021 took place in the context of the 21-day review cycle and the provisions of the Welsh Elections (Coronavirus) Act 2021, as set out in the section of this statement headed 'Planning and legislation for the Senedd Election in May 2021' above. Similarly, in relation to the Tribunals, decisions were made by Ministers to seek the provisions contained in the Coronavirus Act 2020, as described above, and then decisions were made by the PWT and the Tribunal Presidents on the arrangements to operationalise those provisions, as outlined above.
47. ETCJ had no other role in relation to non-pharmaceutical interventions, and whilst again noting the significant and sustained resourcing pressures as referred to earlier

no challenges specific to ETCJ emerged in supporting core political and administrative decision-making. Nor did ETCJ have any role or involvement in any of the following matters:

- a. Any advice or discussions relating to the Welsh Government's initial strategies relating to community testing, surveillance, the movement from 'contain' to 'delay' and guidance and advice to health and social care providers,
- b. Any advice or discussions relating to the Stereophonics concerts and the Wales Scotland rugby international in March 2020,
- c. The use of regulations under the Public Health (Control of Disease) Act 1984 to impose the first lockdown regulations in Wales.

#### Data modelling, behavioural science, and communications

48. Apart from the work undertaken by TAG and the CMO in relation to the Senedd elections described above, ETCJ had no role in relation to the use of data modelling, behavioural science, or communications.

#### Intergovernmental relations, and impacts of UK Government decision-making

49. I have described above the nature of engagement with the UK Government and other devolved governments in relation to matters for which ETCJ had responsibility, namely the Coronavirus Act, the Senedd elections and the devolved Tribunals. More generally, ETCJ has oversight of intergovernmental relations with the UK Government and the other devolved governments, including in relation to the Memorandum of Understanding which sets out the principles that underline relations between the UK Government and the devolved governments, the Joint Ministerial Committee (JMC) and the new structures that replaced the JMC following the conclusion of the review of intergovernmental relations in January 2022.

50. The Directorate was also involved in supporting Ministers in their virtual participation in summit meetings of the British-Irish Council on 6 November 2020 and 11 June 2021, and the in-person summit meeting held in Wales at St. Fagans on 18/19 November 2021. The Directorate led on the preparations and arrangements for the November 2021 Summit, which was hosted by the Welsh Government. The British-Irish Council was established under the 1998 'Good Friday Agreement'. It aims to provide a forum where members can have an opportunity to consult, co-operate and exchange views with a view to agreeing common policies or common actions in areas of mutual interest for the benefit of all. A range of issues were discussed at each meeting, as set out in

the communiques issued by the British-Irish Council Secretariat after each meeting, with issues connected to the pandemic featuring at each meeting during this period. I attach the Written Statements issued following the British-Irish Council summits, at **DCM2BCJD01/32-INQ000350606**, **DCM2BCJD01/33-INQ000350594** and **DCM2BCJD01/34- INQ000350631**.

51. However, the directorate was not involved directly in specific channels of intergovernmental engagement established for the Covid-19 pandemic. An overview of the intergovernmental relationship with the UK Government during the period April 2020 – March 2021 was outlined in the '*Inter-institutional relations agreement between the National Assembly for Wales and the Welsh Government: annual report 2020 to 2021*', which I exhibit at **DCM2BCJD01/35-INQ000350426**.

52. The Directorate was jointly involved in two 'summits' involving the Prime Minister and the First Ministers of the Devolved Governments on 3 June 2021 and 18 October 2021, at which issues related to the pandemic were discussed, along with other matters. I exhibit at **DCM2BCJD01/36-INQ000023293** a Written Statement issued by the First Minister on 15 June 2021 summarising the June 2021 summit, and at **DCM2BCJD01/37- INQ000256911** a Written Statement issued by the First Minister on 28 October 2021 summarising the October 2021 summit.

53. The Directorate also had an involvement at times in arrangements for some of the various Ministerial meetings relating to the pandemic and other matters which the First Minister had with UK Government Ministers (in particular, Michael Gove) and counterparts in the Scottish Government and Northern Ireland Executive during the specified period. I understand that these matters have been set out in more detail in the statement of Liz Lalley, so I do not cover them here.

#### Evidence at Senedd Committees

54. Officials from ETCJ regularly supported Ministers in giving written or oral evidence to Senedd Committees during the specified period in relation to the work of the Directorate. In general, these were not focused on the response to Covid-19, though Covid-19 may have a contextual factor raised at times in relation to its effect on other work. Officials also supported Ministers during the Senedd scrutiny process for the Welsh Elections (Coronavirus) Act 2021.

## **Enforcement**

55. I note the questions in the Rule 9 request relating to enforcement of coronavirus regulations. The directorate was involved in discussions with the UK Government on whether it was reasonable for the Single Justice Procedure to be used where alleged breaches of regulations were before the Magistrates' Court. This culminated in correspondence between the First Minister, Lord Chancellor and Attorney General in March-May 2021, in which the UK Government made clear its intention to use the procedure notwithstanding Welsh Government concerns about the appropriateness of hearing cases on Welsh regulations in this manner. I exhibit the correspondence at **DCM2BCJD01/38- INQ000350632** and **DCM2BCJD01/39- INQ000350633**.

56. ETCJ had no other involvement in enforcement matters, but I understand that a separate statement will be submitted which addresses the questions posed.

## **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:**

**Personal Data**

**Dated:** 05/12/23