

**IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION  
MEDIA AND COMMUNICATIONS LIST**

**Claim No.: KB-2025-001120**

**BETWEEN:**

**GOOD LAW PROJECT LIMITED**

**Claimant/  
Respondent**

**-and-**

**REFORM UK PARTY LIMITED**

**Defendant/  
Applicant**

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**FIRST WITNESS STATEMENT OF  
JOLYON TOBY DENNIS MAUGHAM KC**

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I, **JOLYON TOBY DENNIS MAUGHAM KC**, of Good Law Project Limited, 5th Floor, 167-169 Great Portland Street, London, W1W 5PF, **WILL SAY** as follows:

**A. INTRODUCTION**

1. I am a barrister and the Founder and Executive Director (and an employee) of Good Law Project Limited ("**Good Law Project**"), a non-profit company limited by guarantee (company registration number: 10556197), which is the Claimant in these proceedings. I am duly authorised to make this witness statement on its behalf in defence of the application issued by the Defendant on 30 June 2025 for strike-out under CPR 3.4 and/or summary judgment under CPR 24.2 (the "**Application**").
2. The evidence filed by the Defendant in support of the Application, in the form of the Witness Statement of Dominic David Edward Burgess ("**Burgess 1**"), contends that the Claimant's claim should be struck out, or alternatively that summary judgment should be ordered against the Claimant, including on the basis of an allegation that Good Law Project does not satisfy the conditions of the Data Protection Act 2018 (the "**DPA**") at:

- 2.1 Section 187(3)(a), namely that by virtue of its constitution or an enactment, Good Law Project is not: “*required (after payment of outgoings) to apply the whole of its income and any capital it expends for charitable or public purposes*”;<sup>1</sup>
- 2.2 Section 187(3)(b), namely that by virtue of its constitution or an enactment, Good Law Project is not: “*prohibited from directly or indirectly distributing amongst its members any part of its assets (otherwise than for charitable or public purposes)*”;<sup>2</sup> and
- 2.3 Section 187(4), namely that Good Law Project is not: “*active in the field of protection of data subjects’ rights and freedoms with regard to the protection of their personal data*”.<sup>3</sup>
3. I make this witness statement to assist the Court in examining these contentions, which I consider to be incorrect, by explaining:
  - 3.1 Good Law Project is a non-profit organisation which is required by its articles of association to apply the whole of its income and any capital it expends for public purposes (after payment of outgoings); and
  - 3.2 Good Law Project is active in the field of data protection and privacy. I detail the growing focus and scale of these activities from inception until the appointment of Duncan McCann in the new role of Head of Technology and Data in 2024 (Good Law Project’s subsequent activities are described in Mr McCann’s own witness statement, which I understand will be filed and served at the same time as this witness statement (“**McCann 1**”)).
4. As a corollary of paragraph 6(1) of Burgess 1, I do not understand the Applicant to contend that Good Law Project fails to satisfy section 187(3)(c) of the DPA, namely that Good Law Project “*has objectives which are in the public interest*”. However, to the extent that this is in dispute, I note that this is also addressed as part of my explanation of the non-profit status of Good Law Project.
5. Except where otherwise stated, the facts and matters contained in this witness statement are based upon my own knowledge, and are true. Where facts and matters are not within my own

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<sup>1</sup> DDEB1/10.

<sup>2</sup> DDEB1/10.

<sup>3</sup> DDEB1/2-3.

knowledge, I identify the source of that information and confirm that those facts or matters are true to the best of my knowledge and belief.

6. This witness statement was prepared following discussions conducted in person and over email, with Good Law Project's solicitors, Pallas Partners LLP ("**Pallas**") during the course of these proceedings. Nothing in this witness statement is intended to constitute a waiver of privilege by the Claimant in respect of any documents or communications.
7. There is now shown to me marked "**JTDM1**" a bundle of copy documents to which I refer in this statement by page numbers in square brackets. Where documents I refer to are exhibited to Burgess 1, I do not exhibit them but instead refer to [**DDEB1/page**].

## **B. BACKGROUND TO FORMATION OF GOOD LAW PROJECT**

8. I am a barrister and was called to the bar of England & Wales in 1997. In 2015, I took silk and was elevated to the rank of Queen's Counsel (as it was then known). During this time, I specialised in tax litigation.
9. In this time, I wrote about and campaigned for changes to tax policy, including as an advisor to the Labour Party under Ed Miliband. I was approached by a number of non-governmental organisations with ideas for strategic litigation. I came to believe, and continue to believe, that lawyers are better placed than non-lawyers to spot those opportunities. I was not very motivated by money and so, over time, chose to leave the Bar to focus on being a client in strategic litigation.
10. As a consequence, in late 2016, following a donation by Rupert Evans, who eventually became and remains its chair, I decided to set up Good Law Project.
11. Between then and January 2017, when Good Law Project was incorporated, I considered the appropriate structure and setup of the organisation, as a number of options are available to non-profit entities. I considered charitable status, which I knew to carry tax advantages. But I did not feel able to rely on the Charity Commission's approach to the question of what is in the public interest. It was my perception at the time that the Charity Commission had become very politicised and I did not feel comfortable that it would regulate us fairly. I did not want to try to second-guess what appointees whose politics were inimical to mine would feel about the work we did. I also considered forming Good Law Project as a Community Interest Company (a "**CIC**"). But I considered that it would likely fall foul of the political activities test in Regulation 3 of The Community Interest Company Regulations 2005. Therefore, I

formed Good Law Project as a company limited by guarantee, which is a type of company that cannot pay dividends.

12. By its objects and purposes, Good Law Project was always intended to be a not-for-profit organisation. I therefore pledged publicly that Good Law Project would never pay me more than a backbench member of parliament receives (and it never has). I also embedded into the articles of association adopted on incorporation in 2017 provisions prohibiting the use of the company for private profit. (I write about the changes in the company's articles beneath, from paragraph 17 onwards.)
13. As Good Law Project grew and took up more and more of my time, I became increasingly uncomfortable with whether I was able to properly meet my professional obligations to my clients at the Bar. I therefore retired from practice at the Bar. I left Chambers at the end of 2020 but the process of winding down my litigation practice took a number of years and I have only recently relinquished my practising certificate. Good Law Project started with no employees<sup>4</sup> and has grown to an organisation of nearly 40 individuals,<sup>5</sup> with a board of seven non-executive directors<sup>6</sup> (and myself as the sole executive director) who support in the stewardship of the enterprise in pursuit of its objectives.
14. The principal activity of Good Law Project is to use the law to “*address significant issues of disadvantage, discrimination, unfairness and wrongdoing*”.<sup>7</sup> Over the years, we have focused on this object in different ways. We are currently focused on doing what we can to address the means by which authoritarianism is delivered, and to help people and communities who are its target. Included in that “means” is the use and misuse of data and technology, which has become an increasing focus of our work.

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<sup>4</sup> See, page 1 of Unaudited Financial Statements for Year Ended 31 January 2018 [JTDM1/3].

<sup>5</sup> See, page 8 of Annual Report and Unaudited Financial Statements for Year Ended 31 January 2024 [JTDM1/16].

<sup>6</sup> See, page 1 of Annual Report and Unaudited Financial Statements for Year Ended 31 January 2024 [JTDM1/9].

<sup>7</sup> See, ‘Principal Activities’ at page 1 of Annual Report and Unaudited Financial Statements for Year Ended 31 January 2024 [JTDM1/9]. This document is publicly-available on Good Law Project’s website. Accessible at: <<https://goodlawproject.org/wp-content/uploads/2024/06/240625-SIGNED-Statutory-Accounts-for-filing-31-01-2024-Good-Law-Project.pdf>>.

## C. GOOD LAW PROJECT'S NON-PROFIT STATUS

### Overview

15. As a non-profit organisation acting in the public interest, Good Law Project operates under an “asset lock”. This ensures that any surplus is applied to the organisation in support of its public purposes, rather than to its members. Good Law Project’s website states: “*We have an asset lock which means any profit goes back into the organisation – not to shareholders or members.*” [JTDM1/25]
16. From my initial research into the various legal forms that Good Law Project might take, and conversations with putative institutional funders, I understand that an asset lock is a legal mechanism which prevents the assets of an entity being used for private gain. Those assets, as well as any profits or other surpluses generated by the entity’s activities, are protected for the benefit of the organisation, community or public purpose it was set up to serve, rather than any private or personal gain of its members. This mechanism is commonly used in social enterprise or non-profit organisations, including in particular CICs.<sup>8</sup>

### Articles of Association

17. Good Law Project’s articles of association have undergone several revisions since Good Law Project was incorporated in 2017 [JTDM1/27-55]. Revisions were made in each of 2018 [JTDM1/56-79], 2019 [JTDM1/80-104] and 2021 [JTDM1/105-124] (I refer to the final version as the “**GLP Articles**”). Much development came after 2019, when Siham Bortcosh, an experienced charity chief operating officer, joined Good Law Project and worked to professionalise its governance and structure.
18. I recognise that the interpretation of the GLP Articles and their potential application in respect of section 187(3) of the DPA is properly a matter for legal submissions and the Court’s determination. Accordingly, I confine myself to drawing to the Court’s attention relevant provisions of the GLP Articles and previous iterations without detailed exposition.

2017

19. The original articles of association, adopted on 10 January 2017 [JTDM1/36-55], stated:

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<sup>8</sup> See, for example, ‘Community Interest Companies Guidance’ (Web Page, as at 4 April 2025) <<https://www.gov.uk/government/publications/community-interest-companies-how-to-form-a-cic/community-interest-companies-guidance-chapters#asset-lock>>.

3.3 *The income and property of the Company shall be applied solely towards the promotion of its objects as set forth in this Article 3 and no portion thereof shall be paid or transferred, directly or indirectly, by way of dividend, bonus or otherwise howsoever by way of profit, to members of the Company, provided that nothing herein shall prevent any payment in good faith by the Company:*

3.3.1 *of reasonable and proper remuneration to any member, officer or servant of the Company for any services rendered to the Company;*

3.3.2 *of any interest on money lent by any member of the Company or any director at a reasonable and proper rate;*

3.3.3 *of reasonable and proper rent for premises demised or let by any member of the Company or any director; and*

3.3.4 *to any director of out-of-pocket expenses.*

3.4 *If upon the winding up or dissolution of the Company there remains, after the satisfaction of all its debts and liabilities, any property whatsoever, the same shall not be paid or distributed among the members of the Company, but shall be given or transferred to some other institution (charitable or otherwise) having objects similar to the objects of the Company and which shall prohibit the distribution of its or their income to its or their members, such institutions to be determined by the members of the Company at or before the time of dissolution.*

2018

20. New articles of association were adopted on 27 July 2018 [JTDM1/56-79]. Those articles did not include any asset-lock provisions. I do not recall why – certainly it was not the result of a conscious choice because I have been unwavering in my view that monies donated to Good Law Project should be used only in support of its objects. I did have a set of articles drafted for Good Law Project by a friend who was a member of the Chancery Bar and he may not have appreciated the need for an asset lock and I may not have picked up its omission. However, those articles were in place for less than one year.

2019

21. On 15 February 2019, new articles of association were adopted [JTDM1/80-104]. As I explained above, Siham Bortcosh, an experienced charity chief operating officer, joined Good Law Project in 2019 and worked to improve its governance and structure. This iteration of the articles contained asset-lock provisions which we copied (revising and supplementing as

necessary) from the CIC model constitution for companies limited by guarantee with small membership.<sup>9</sup>

22. The relevant provisions are as follows:

***PART 1A NOT FOR PROFIT COMPANY***

***3A. Asset Lock***

*3A.1 The Company shall not transfer any of its assets other than for full consideration.*

*3A.2 Provided the conditions in Article 3A.3 are satisfied, Article 3A.1 shall not apply to:*

*(a) the transfer of assets to any specified asset-locked body, or (should it no longer exist) to any other asset-locked body; and*

*(b) the transfer of assets made for the benefit of the community other than by way of a transfer of assets into an asset-locked body.*

*3A.3 The conditions are that the transfer of assets must comply with any restrictions on the transfer of assets for less than full consideration which may be set out elsewhere in the memorandum and Articles of the Company.*

*3A.4 If:*

*3A.4.1 the Company is wound up under the Insolvency Act 1986; and*

*3A.4.2 all its liabilities have been satisfied*

*any residual assets shall be given or transferred to the asset-locked body specified in Article 3A.5 below notwithstanding anything to the contrary in these Articles.*

*3A.5 For the purposes of this Article 3A, the following asset-locked body is specified as a potential recipient of the Company's assets under Articles 3A.2 and 3A.4:*

*Name: The Public Law Project*

*Charity Registration Number (if applicable): 1003342*

*Company Registration Number (if applicable): 2368562*

*The Company shall not transfer any of its assets other than for full consideration.*

***3B. Not for profit***

*3B.1 The Company is not established or conducted for private gain: any surplus or assets are used principally for the benefit of the community.*

2021

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<sup>9</sup> The current version can be found at <[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/619665/model-articles-of-association-limited-by-guarantee-small-membership.doc](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/619665/model-articles-of-association-limited-by-guarantee-small-membership.doc)>. I do not know if it has been amended since 2019, though I note that the document states “V1.1 3/7/2012” in its footer.

23. Finally, on 15 December 2021, the GLP Articles were adopted [DDEB1/2-20] [JTDM1/105-124]. These remain in force and are made available on Good Law Project's website [JTDM1/125].<sup>10</sup> The relevant provisions are as follows:

*4. Asset Lock*

*4.1 The company shall not transfer any of its assets other than for full consideration except for:*

*4.1.1 the transfer of assets to an asset-locked body; and*

*4.1.2 the transfer of assets made for the benefit of the community other than by way of a transfer of assets into an asset-locked body.*

*4.2 If the company is wound up under the Insolvency Act 1986 and all its liabilities have been satisfied, any residual assets shall be given or transferred to an asset-locked body.*

*LIMITATION ON PRIVATE BENEFITS*

*5. Limitation on private benefits*

*5.1 The income and property of the company shall be applied solely towards the promotion of its objects.*

*Permitted benefits to members*

*5.2 No part of the income and property of the company may be paid or transferred directly or indirectly by way of dividend, bonus or otherwise by way of profit to any member of the company. This shall not prevent any payment in good faith by the company of:*

*5.2.1 any payments made to any member properly in their capacity as a beneficiary of the company;*

*5.2.2 reasonable and proper compensation to any member for any services, goods or other property supplied to the company (including services performed by the member under a contract of employment with the company), provided that if such member is a director, Article 5.3 shall apply;*

*5.2.3 interest at a reasonable and proper rate on money lent by any member to the company;*

*5.2.4 any reasonable and proper rent for premises let by any member to the company; and*

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<sup>10</sup> Of course, all Good Law Project's Articles of Association, current and past, are publicly available on the website of Companies House. Accessible at: <<https://find-and-update.company-information.service.gov.uk/company/10556197/filing-history>>

*5.2.5 any payments to a member who is also a director which are permitted under Article 5.3.*

24. No payment has ever been made pursuant to Article 5.2.1. As to Good Law Project's objects, which Article 5.1 requires all income and property to be applied towards, the GLP Articles set out at Article 2 [JTDM1/109]:

*The objects of the company are:*

- 2.1 to promote the sound administration of the law and to challenge injustice and inequality;*
- 2.2 to uphold democracy and promote changes to the law and public administration with the aim of improving social justice, equality and inclusion;*
- 2.3 to uphold high standards in public administration in accordance with democratic principles;*
- 2.4 to enable and promote access to justice and the law, particularly for those whose access is curtailed because of poverty, social or economic disadvantage or discrimination;*
- 2.5 to protect and preserve the environment for the benefit of mankind now and in the future;*
- 2.6 to advance education and research into good application and development of the law and of administrative practice;*
- 2.7 to promote compliance with the law by public and private actors and to address imbalances of economic power in the application of the law; and*
- 2.8 to further any other philanthropic or benevolent purpose ancillary to the above purposes.*

25. Good Law Project's accounts, which are publicly-available on its website (and on the Companies House website), are consistent with what is said in the GLP Articles. For example, the Annual Report and Unaudited Financial Statements for the Year Ended 31 January 2024 (the "**2024 Accounts**") state at page 11 [JTDM1/19]:

*"As set out in its Articles of Association, the income and property of the company shall be applied solely towards the promotion of its objects. No part of the income and property of the company may be paid or transferred directly or indirectly by way of dividend, bonus or otherwise by way of profit to any member of the company. The company's Articles also contain an 'asset lock' so that should the company cease to exist, residual assets must be given or transferred to an asset-locked body such as a charity or a community interest company."*

### Good Law Project's Finances

26. Good Law Project has always acted in accordance with its articles of association.
27. The vast majority of Good Law Project's funding comes from small donations from individuals across the United Kingdom. This has always been the case. For example, during the year to 31 January 2024 (as set out on page 17 of the 2024 Accounts [JTDM1/22-23]):
  - 27.1 Good Law Project obtained around £4.6 million in income from: (a) regular and one-off general donations (accounting for almost 80% of Good Law Project's income); (b) crowdfunded income; (c) grants and high value donations; and (d) legal costs awarded.
  - 27.2 All of this income was deployed into Good Law Project's costs, consisting of: (a) litigation and mission-related costs, such as legal advice, research, wages, etc and campaigns, communications and fundraising (accounting for almost 80% of Good Law Project's costs); and (b) administrative expenses.
28. In other words, all of Good Law Project's income in 2024 was expended in pursuit of its public purpose objects, including the administrative expenses necessary to carry this out. This is the same as in other years; where Good Law Project does not spend all one year's income on its public purpose objects, the surplus goes to reserves and is deployed on those objects in later year. This has been the case since inception in 2017.
29. Good Law Project has never distributed any part of its profits, income or assets to members or otherwise.
30. I (the sole member of Good Law Project) have been paid a salary as an employee by Good Law Project, in accordance with article 5.2.2 of the GLP Articles. This salary has never been more than that received by a backbench member of parliament and I am not Good Law Project's highest-paid member of staff.
31. All of the materials I have exhibited are publicly available online and therefore accessible to the Defendant.

### **D. ACTIVITY IN THE FIELD OF DATA SUBJECTS' RIGHTS AND FREEDOMS**

32. Good Law Project has long been involved in the field of protection of data subjects' rights and freedoms with regard to the protection of their personal data. From early on, this was an area we wanted to be active in. As I detail below, data protection emerged as a key focus area in 2019 and has only grown in strategic importance. This growing priority led us to bolster our

board with technology-focused expertise in 2021. By last year, the volume of work in this area had grown to such an extent that we needed to appoint a dedicated Head of Technology and Data, who as noted is Duncan McCann.

33. On 12 September 2019, Good Law Project and the Legal Education Foundation co-hosted an invitation-only roundtable discussion titled “Public Law and the Digital Welfare State”.<sup>11</sup> This was borne out of concerns regarding the increasing use of automated data processing in government decision-making in the area of welfare, with a focus on transparency, explainability, the right to reasons and the effect on individuals. The discussion drew together public law, welfare and technology experts.
34. On 9 November 2019, I made a public statement on Twitter (now X), indicating an intention by Good Law Project to bring litigation to help develop legal safeguards around algorithmic decision-making and its impact on data privacy.<sup>12</sup>
35. In 2021, we sought to strengthen our board with technology-focused expertise. In August 2021, we announced the appointments of Susan Morgan, Mathew Lodge and Justin Walters, joining Rupert Evans (a technology entrepreneur who had been a member of the board since 2018).
36. Around the same time, we became greatly concerned about the potential harms that technology platforms pose to children and young adults and started to consider potential litigation. From June 2021 onwards, we worked with University of Cambridge legal scholars, counsel, and solicitors to explore the viability of litigation against various parties under data protection legislation (particularly the UK’s retained General Data Protection Regulation (“GDPR”) legislation and DPA, among others), in respect of potential unlawful data processing by platforms such as Facebook and Instagram, among other potential causes of action relating to online harms caused to children.
37. This culminated in a detailed note of advice from counsel and solicitors in April 2022, privilege over which is not waived, advising on the merits of legal action under the GDPR against Meta.
38. This work continued over 2022 and 2023 and it remains an area of continuing interest to us. We commissioned solicitors to review various jurisdictions to identify the right one for this envisaged data protection-based litigation, having regard to costs and judicial attitudes to

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<sup>11</sup> See, Email Invite from Swee Leng Harris of The Legal Education Foundation for ‘Public Law and the Digital Welfare State – Explanations Needed’ Event [JTMD1/128-129].

<sup>12</sup> See, X (formerly Twitter) Statement of Jolyon Maugham [JTMD1/130].

privacy. We then employed a Legal Manager on a temporary contract to identify test claimants from that jurisdiction. She was unable to do so and so there has been very little progress on this in the last eighteen months or so, particularly while we have been busy with the other initiatives I detail below, but this is something we do return to periodically in internal discussions.

39. At the time (in 2021), the potential harm caused by “big tech” to user safety and wellbeing was an area receiving growing public interest and media attention, with associated data protection and privacy concerns. For example, the Wall Street Journal published its five-part “Facebook Files” series, following Facebook internal document leaks from whistleblower Frances Haugen. One of the articles focused on the harmful effects of Instagram on young people, indicating that the platform held extensive research and data regarding potential harms to young users (such as in the areas of body image, suicide and self-harm). This led to renewed public criticism and condemnation of the platform, as well as significant regulatory attention, including from a data protection and privacy perspective due to concerns regarding the processing of user data and the transparency around these practices. This fuelled our interest in this area. Further, in 2022, an inquest into the suicide of teenager Molly Russell found that the unsafe online content she had viewed contributed to her death. This implicates the same questions regarding transparency around and processing of young users’ data.
40. In 2022, Good Law Project obtained a £75,200 grant from Luminate, a global foundation with a mission to “*ensure that everyone – especially those who are underrepresented – has the information, rights, and power to influence the decisions that affect their lives*”.<sup>13</sup> The grant was to enable Good Law Project to assess the merits of litigation in respect of online harms to children, including from a data protection and privacy angle, and to scope a public campaign to address the impact of social media on mental health and body image for children and young people. Once again, concerns around data processing and protection underpinned both strands of this work.
41. Arising from this, Good Law Project embarked on an ambitious project to try to record and map some of the harmful material arising from Instagram recommender systems, to help shed light on the processing of personal data through algorithms and automated decision-making.

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<sup>13</sup> See, Luminate Group, ‘Who we are’, *Luminate* (Web Page, as at 6 October 2025) <<https://www.luminategroup.com/about>>.

Good Law Project set up the “Instaharms” website and received a very substantial number of submissions. The “About” page of the website explains: [JTM1/131-132]

*“Focussing on Instagram*

*‘Recommender algorithms’ store data about instagram users’ activities online to show them increasingly ‘relevant’ content: ‘if you like this... you’ll love this’. This is ‘data processing’ under the GDPR and is a form of automated decision-making. The algorithm profiles users according to their likes and dislikes, and makes recommendations based on those profiles. When children ‘like’ harmful content, the algorithm offers them more of the same.*

*Under the GDPR, organisations may only process personal data in ways which are ‘transparent, fair, and lawful’. Companies must be transparent about how they intend to use data, so that people can give lawful, informed consent to those uses. Proving informed consent by children (who have less understanding of the wider implications of data processing) is a higher bar than for adults.*

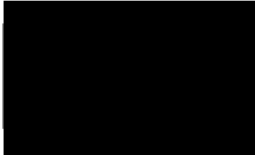
*Recent leaks have revealed that Instagram is aware of the harm that their recommender algorithms cause children and young people. This means it is not being transparent about the ways in which it processes personal data, for which users cannot possibly be giving their informed consent.” (My emphasis)*

42. I was not managing the Instaharms project (and the staff members responsible for the initiative have since moved on from Good Law Project) but I would estimate the number of submissions that we received to number at least in the high hundreds. Although this did not result in litigation, it is still an area that Good Law Project is actively investigating and working on.
43. Prior to the 2024 General Election in the UK, Good Law Project established a project to assist individuals to better understand the personal data that political parties hold on them. This, and other ongoing data protection activities of Good Law Project, is further addressed in McCann 1. The scale and breadth of Good Law Project’s activity in this sphere is exemplified by Duncan’s appointment in 2024.
44. At that time, despite our commitment to undertaking work in this area, and the board’s strong support for it, we recognised that we lacked the specialist expertise required to deliver the mandate. We were invited to bid for funding from a private foundation to support technology projects and were successful in securing three years of funding for what would become Duncan’s role. We therefore commenced a recruitment process to identify a candidate with the expertise to lead this important work as a dedicated Head of Technology and Data. The creation of this position was a direct response to the growing volume of critical work undertaken by Good Law Project in this area.

**Statement of Truth**

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

Signed:

A solid black rectangular box redacting the signature of the witness.

Name: Jolyon Toby Dennis Maugham KC

Position: Executive Director

Date: 10 October 2025