

COUNCIL OF LEGAL EDUCATION
NORMAN MANLEY LAW SCHOOL

ADVOCACY PROGRAMME

YEAR II

CIVIL BRIEF

DANIEL THOMAS v. SECURE FOR SURE
LIMITED and JOHN KEEPSAKE

NORMAN DAVIS

PARTICULARS OF CLAIM

IN THE SUPREME COURT OF JUDICATURE OF JAMAICA

CLAIM NO.

HVC 3 OF 2009

BETWEEN	DANIEL THOMAS	CLAIMANT
AND	SECURE FOR SURE LTD	FIRST DEFENDANT
AND	JOHN KEEPSAFE	SECOND DEFENDANT

1. At all material times the claimant was a professional music artiste residing at Townhouse 15, Uptown Mews, a townhouse complex located in Beverley Heights, St. Andrew.
2. At all material times, the First Defendant was a company duly incorporated in Jamaica with registered offices located at 6 Bayview Drive, Kingston and is engaged in the business of providing security services and provides these services to the said townhouse complex.
3. At all material times the second defendant was a security guard employed to the first defendant and assigned to duty, at the said townhouse complex.
4. On January 12, 2008 at about 9:00 am, the claimant was rehearsing in the backyard of his premises for upcoming U.S performances when his neighbour, Priscilla Aloof and the second defendant entered there without permission. Both persons refused the claimant's request to leave and instead verbally abused the claimant.
5. The second defendant, who was armed with a baton, then proceeded to violently assault and beat the claimant with it. At all material times the second defendant in doing so acted in the course of his employment with the first defendant and without lawful excuse.
6. As a result of the matters set out above, the claimant suffered severe personal injuries, pain and suffering and damage.

PARTICULARS OF INJURY

The claimant who is 26 years old having been born on February 21, 1983, suffered severe personal injuries:

- (a) A 4 cm abrasion to the right shoulder;
- (b) A large swelling in the middle back;
- (c) A compound fracture of the right lower limb.

The claimant will rely, as part of his case, on the medical report of Dr. Charles Dogood, a copy of which was attached to the claim form and is attached hereto.

PARTICULARS OF SPECIAL DAMAGE

Loss of earnings from January 12, 2008 to present \$9 million and continuing at \$3 million per annum.

Medical expenses - \$300,000.00

Further, the claimant claims interest pursuant to the Law Reform (Miscellaneous Provisions) Act on the amount found to be due to the claimant at such rate and for such period as the court shall think fit.

AND THE CLAIMANT claims:

- 1) Damages
- 2) Interest
- 3) Costs

I certify that all the facts set out in this Particulars of Claim are true to the best of my knowledge, information and belief.

Dated the 12th day of January 2009

Signed: Daniel Thomas

The claimant's address for service is that of his attorneys Bailey & Clarke of 17 Main Street, Kingston 3 whose telephone number is 814-2024 and fax number is 967-1220.

FILED BY BAILEY & CLARKE OF 17 Main Street, Kingston 3, Attorneys-at-law for the claimant whose telephone number is 814-2024 and fax number is 967-1220.

EXPERT REPORT OF DR. CHARLES DOGOOD
RE: DANIEL THOMAS

1. My name is Dr. Charles Dogood and I reside at 18 Heights Road, Kingston 07 and my office address is 04 Fairhaven Boulevard, Kingston 10 and I am an orthopedic surgeon and practice at the University Hospital as well as in private practice.
2. I studied at the University of the West Indies and have a Bachelor of Surgery (BS) degree (Hon.) and a Doctor of Medicine (MD) degree and have been practicing medicine for 15 years and am a certified medical practitioner.
3. I have worked in the emergency room and surgical ward of the University Hospital of the West Indies since January 1998.
4. On January 12, 2008, I was on duty at the University Hospital Emergency Room when a 26 year old male was admitted in an unconscious state. I was told by a woman who accompanied him and said her name was Sarah Wilson that the man was Daniel Thomas a/c "Ras Fire".
5. On examination I found the following injuries to Mr. Thomas:
 - (d) A 4 cm abrasion to the right shoulder;
 - (e) A large swelling in the middle back;
 - (f) A compound fracture of the right lower limb;
6. Mr. Thomas was admitted by me to the surgical ward under my care. I ordered x-ray examinations to both his lower limbs and his upper back. The x-rays revealed an open (compound) fracture of the right tibia distal 1/3. There were no fractures or other remarkable features to his left lower limb nor his back.

7. He underwent surgery on for this injury on January 13, 2008, for 2 ½ hours to clean the site of the injury and stabilize the fracture and a titanium nail was inserted into his tibia and five screws were used to secure it in place. The entire right lower extremity was put in a cast. The nail is intended to be permanent and will only be removed if it causes problems later.
8. Mr. Thomas was discharged from the hospital on January 31, 2008 in a wheelchair and he was transferred to Mona Rehabilitation Centre for further treatment and management.
9. I received oral instructions to prepare a Report on Mr. Thomas's injuries, treatment and any resulting permanent disability on December 15, 2008 from Mr. William Bailey, Attorney-at-Law at a conference at his office at 17 Main Street, Kingston 03 along with a consent form signed by Mr. Thomas.
10. I have been asked to provide an expert opinion on the injuries sustained by Mr. Thomas, the treatment administered to him and on any resulting disability.
11. I have set out in paragraphs 5, 6, 7 and 8 of this Report the injuries I observed and the treatment administered to Mr. Thomas.
12. It is my professional medical opinion that Mr. Thomas has a 10% permanent disability of the whole person and a 60% permanent disability of the right lower limb with severe stiffness of the right lower limb and right knee joint. This restricts his ability to walk and dance and has left him with a limp due to the shortening of his right lower limb, by approximately 2 cm. That the degrees of disability in my opinion are in conformity with the Guidelines of the American Academy of Orthopedic Surgeons.

I understand that it is my duty to help the Court impartially on all matters relevant to my expertise and that duty overrides any obligation to Mr. Thomas and his attorney who instructed me and who paid me for the report. I have read Part 32, in particular Rules 32.3 and 32.4 of the Civil Procedure Rules and state that I believe that I have carried out my duty in the manner set out in the Rules.

I have included all matters within my knowledge and area of expertise relevant to the issue on which my expert evidence is given. There is nothing to my knowledge which affects the validity of this report.

I certify that the matters contained in this Expert Report are true to the best of my knowledge and belief and outlines all matters within my knowledge and area of expertise relevant to the issue on which the expert evidence is given.

DATED THE 28th DAY OF December, 2008

-- *C. DoGood*-----

Dr. Charles DoGood
BS, MD. (UWI)

DEFENCE OF DEFENDANTS AND COUNTERCLAIM OF SECOND DEFENDANT

IN THE SUPREME COURT OF JUDICATURE OF JAMAICA

CLAIM NO.

HVC 3 of 2009

BETWEEN	DANIEL THOMAS	CLAIMANT
AND	SECURE FOR SURE LTD	FIRST DEFENDANT
AND	JOHN KEEPSAFE	SECOND DEFENDANT

1. The defendants admit paragraphs 1, 2 and 3 of the Particulars of Claim.
2. The defendants deny the allegation of trespass and verbal abuse alleged in paragraph 4. The defendants say that the entry was necessary and lawful in order for the second defendant to request the claimant to cease rehearsing in his backyard because it constituted a nuisance to his neighbours.
3. The defendants admit that the second defendant hit the claimant and that he was acting in the course of his employment as set out in paragraph 5 of the Particulars of Claim. The defendants say that the first defendant hit the claimant in order to defend himself from a threat and an attempt by the Claimant to kill him.
4. In particular the defendants say that the claimant viciously attacked the second defendant with a microphone stand and the second defendant thereby apprehended imminent danger to his life. He responded in self defence and with reasonable force in the circumstance to stop the attack.
5. In response to paragraph 6 of the Particulars of Claim, the defendants agree the medical report of Dr. Charles Dogood, but make no admission as to the loss or damage or as to the amount claimed.

COUNTERCLAIM OF THE SECOND DEFENDANT

6. The Second Defendant repeats paragraph 1 – 5 of the Defence and Counterclaim and says that the threat and attack on his person by the claimant constituted an assault as the second defendant was put in immediate fear of his life. The second defendant says that he is entitled to damages in respect thereof.

AND THE DEFENDANT COUNTERCLAIMS

- a) Damages
- b) Interest
- c) Costs

I certify that all the facts set out in this Defence and Counterclaim are true to the best of my knowledge, information and belief.

Dated the **2nd** day of **February** 2009

John Keepsake

Signed: _____

The defendants' address for service is that of their Attorneys-at-law, Stewart & Davis 18 Queen Street, Kingston 2, whose telephone number is 547-2348 and fax number is 962-3391.

FILED BY STEWART & DAVIS. 18 Queen Street, Kingston 2, Attorneys-at-law for the defendants whose telephone number is 547-2348 and fax number is 962-3391.

REPLY TO DEFENCE AND DEFENCE TO COUNTERCLAIM

IN THE SUPREME COURT OF JUDICATURE OF JAMAICA

CLAIM NO. HVC 3 OF 2009

BETWEEN	DANIEL THOMAS	CLAIMANT
AND	SECURE FOR SURE LTD	FIRST DEFENDANT
AND	JOHN KEEPSAFE	SECOND DEFENDANT

1. As to paragraph 2 of the Defence, the Claimant denies that his rehearsal was causing any nuisance as alleged or at all.
2. As to paragraph 3 of the Defence, the Claimant denies threatening the second defendant or attempting to kill him as alleged or at all.
3. The Claimant denies attacking the second defendant as alleged in paragraph 4 of the Defence or at all and repeats paragraph 5 of the Particulars of Claim and states that the second defendant was not responding in self-defence nor using reasonable force.
4. As to paragraph 6 of the Counterclaim of the Second Defendant, the Claimant denies that he threatened or attacked the second defendant as alleged and denies any assault on the second defendant and that he is entitled to any damages as alleged or at all.

I believe the contents of this Reply and Defence to Counterclaim to be true and I am duly authorized to make this statement on behalf of the Claimant.

Dated the 10th day of February 2009

Signed: William Bailey
Attorney-at-law for the Claimant

The claimant's address for service is that of his attorneys Bailey & Clarke of 17 Main Street, Kingston 3 whose telephone number is 814-2024 and fax number is 967-1220.

FILED BY BAILEY & CLARKE OF 17 Main Street, Kingston 3, Attorneys-at-law for the claimant whose telephone number is 814-2024 and fax number is 967-1220.

WITNESS STATEMENT OF DANIEL THOMAS

IN THE SUPREME COURT OF JUDICATURE OF JAMAICA

CLAIM NO: HVC 3 OF 2009

BETWEEN	DANIEL THOMAS	CLAIMANT
AND	SECURE FOR SURE LTD	FIRST DEFENDANT
AND	JOHN KEEPSAFE	SECOND DEFENDANT

Daniel Thomas states:

I am 26 years old. I am a professional dancehall D.J known as “Ras Fire” because I am noted for protest lyrics.

I live at Townhouse 15 of the exclusive upscale townhouse complex “The Uptown Mews” Beverly Heights, St. Andrew. I recently purchased in cash a townhouse in this gated community complex and moved there where I now live with my princess, “Princess Sky”.

On taking possession of the town house in early January 2008, I began construction of a soundproof private music studio so that I could rehearse in private and not disturb my neighbours. Construction would take approximately a month but I had to rehearse in the meantime for upcoming U.S. performances.

Within a few days of moving in my next-door neighbour who I did not know before, Mrs Priscilla Aloof, came to my gate. She seemed upset and beckoned me to come out. When I went to her she said to me in a rude manner “Young man I am Priscilla Aloof your next door neighbour”. Your workmen are disturbing the peace of this well respected neighbourhood and I smell ganja coming from your premises. We do not tolerate this here!”

It became clear to me that I had to assert my right to live in the neighbourhood and so I told her a few choice Jamaican bad words at which point she left in a hurry.

The next day as I left the complex by the main entrance/exit gate, the security guard at the security post stopped me. He said to me that Mrs. Aloof had spoken to him about an incident involving me and her. He said, "If yu think yu bad watch me and you". In response, I chanted from Bob Marley's song "War" --- "Until the philosophy which holds one race superior and another inferior is abandoned, totally destroyed, everywhere is war!". I was trying to send him the non-violent message that he was a part of a system discriminating against people like me and him from the ghetto.

After this I noticed that he began to discriminate against me. I was to be advised by intercom from the security post of all visitors, but instead my visitors arrived at my premises without this being done. Further, he was deliberately slow in opening the gate for me.

On January 12, 2008 at about 9:00 am, I was rehearsing in my backyard. The workmen had not yet arrived. I was rehearsing at that time to prevent any noise nuisance to my neighbour. I expected Mrs. Aloof to be at work and her children at school. I had rehearsed at that time before without complaint. The workmen had not yet arrived. They usually come at about 10:00 a.m.

While rehearsing I looked up and to my surprise I saw Mrs. Aloof and the Security Guard to the complex, the accused Mr. John Keepsafe, in my yard. I had not given them permission to enter my yard. I regarded them as trespassers. The accused was armed with a baton. I asked them what they were doing in my yard. I told them to leave but they refused. Instead the accused responded, "You think you badda than me! I will show you!". I have instructions that you are disturbing the peace and I have come to put a stop to it!"

Mrs. Aloof was behind him urging him to “put a stop to this nonsense once and for all, he will destroy this neighbourhood unless he is taught a lesson!”

I felt that this was the last straw and decided on a nonviolent lyrical face off with both of them. I stepped forward a few paces with the microphone and microphone stand in my hand. The microphone was in the microphone stand. I stopped about 15 feet from them so as to not invade their space. I stood my ground and started to chant. I started to chant words from Bob Marley songs “Crazy Baldheads” and “Bad Card”. I chanted “We going to chase those crazy bald heads out of town” and “Yuh a go tired fi see me face caan get me outta di race!”. My actions were nonviolent but defiant.

While I was chanting the accused lost his temper and started swinging his baton wildly. He hit the microphone stand out of my hand and struck me in my knees causing me to fall to the ground. He then struck me viciously in the back. The last thing I remember was that my “Princess” rushed in between us and I lost consciousness.

I woke up in the University Hospital to find myself paralyzed from the waist down. The police came to the hospital and I made a report to them.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: *Daniel Thomas*

Date: 3/5/09

WITNESS STATEMENT OF SARAH WILSON

IN THE SUPREME COURT OF JUDICATURE OF JAMAICA

CLAIM NO: HVC 3 OF 2009

BETWEEN	DANIEL THOMAS	CLAIMANT
AND	SECURE FOR SURE LTD	FIRST DEFENDANT
AND	JOHN KEEPSAFE	SECOND DEFENDANT

Sarah Wilson states:

I am 24 years old. I have been a backup singer for “Ras Fire” for four years and I have been his “Princess” for the past two years. I am called by my stage name “Princess Sky”. I now live with “Ras Fire” at townhouse 15 "Uptown Mews", Beverley Heights St. Andrew. I call him “Fire” for short.

On the morning January 12, 2008, I was cooking an “ital food” breakfast for both of us. “Fire” was in the backyard deejaying in preparation for an upcoming US concert. The microphone was connected to an amplifier inside of the house which was also playing background rhythms.

While in the house I heard a commotion outside. I heard a male voice and a female voice in addition to that of my boyfriend. I went outside to see what was going on.

On reaching outside I saw, “Fire” and the security guard for the complex, the accused, facing each other. Our next-door neighbour who I now know to be Mrs. Aloof was present. They were demanding that he turn down the music and he was refusing to do so. “Fire” still had the microphone stand with the microphone in his hand and the defendant had a baton.

I rushed inside to turn down the music to calm things down and avoid any escalation of the confrontation. While inside I heard "Fire" shout out "Wha yuh licking me for! Yuh mad! I do you anything?!" He was crying out as if in pain.

I rushed back outside to see the security guard and "Fire" in a struggle. The security guard was battering "Fire" with the baton. I rushed between them and pushed the security guard away. Ras Fire lost consciousness. I rushed him to the University Hospital.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: *Sarah Wilson*

Date: 3/5/09

WITNESS STATEMENT OF KARL BLING

IN THE SUPREME COURT OF JUDICATURE OF JAMAICA

CLAIM NO. HVC 3 OF 2009

BETWEEN	DANIEL THOMAS	CLAIMANT
AND	SECURE FOR SURE LTD	FIRST DEFENDANT
AND	JOHN KEEPSAFE	SECOND DEFENDANT

Karl Bling states:

I am the Managing Director of a Promotion Company called “Future Stars” Promotion Ltd. I personally manage Daniel Thomas otherwise known as Ras Fire. Ras Fire has been under my management for the past 3 years and at the time of the incident involving the security guard he was popular, locally and internationally. His popularity was continuing to grow.

“Ras Fire” is a Rastafarian D.J. He has a reputation for chanting protest music against the establishment and anti Rastafarian practices including police brutality, homosexuality and injustice against the poor.

The source of “Ras Fire’s” earnings was principally:

- a) Live shows locally and abroad
- b) Income from endorsements of products of private sector companies
- c) Recordings on dub plates for local and international sound systems
- d) Record sales
- e) Promotions, such as attendance at popular events, interviews and music videos.

He wrote much of his music. At the time of the incident he earned approximately 3 million dollars per year gross but his earning potential was increasing.

Expenses to be deducted from earnings included management fees (appx 15%), promotion fees (appx 5 %) and booking agent fees (appx 10%).

Since the incident Daniel Thomas no longer performs on stage shows or shoots music videos.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: **Karl Bling**

Date 3/5/09

WITNESS STATEMENT OF EVERTON SAMSON

IN THE SUPREME COURT OF JUDICATURE OF JAMAICA
CLAIM NO.

HVC 3 OF 2009

**Made on behalf of: Defendant
Witness : Everton Samson**

BETWEEN	DANIEL THOMAS	CLAIMANT
AND	SECURE FOR SURE LTD	FIRST DEFENDANT
AND	JOHN KEEPSAFE	SECOND DEFENDANT

Everton Samson states:

I am a Constable of police stationed at the Beverley Heights Police Station. On January 12, 2008, at about 9:30 am I was on mobile patrol when I received a radio message to attend the "Uptown Mews" townhouse complex concerning an assault involving a security guard and the well-known deejay, "Ras Fire".

On arrival at the security post, a security guard approached me and identified himself as John Keepsafe. He told me that he was involved in an incident with "Ras Fire" a well-known deejay and resident of the complex and who had been rushed to the University Hospital. He handed me a baton which he said was used in the incident.

I took down the name and address of the security guard and the name of his employer. I ordered him not to leave the premises. I then left to the University Hospital where I saw and interviewed "Ras Fire" and his girlfriend.

John Keepsake was tried in the Circuit Court and acquitted of the charge of causing grievous bodily harm with intent.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: **Everton Samson**

STATEMENT OF JOHN KEEPSAFE

IN THE SUPREME COURT OF JUDICATURE OF JAMAICA

CLAIM NO: HVC 3 OF 2009

BETWEEN	DANIEL THOMAS	CLAIMANT
AND	SECURE FOR SURE LTD	FIRST DEFENDANT
AND	JOHN KEEPSAFE	SECOND DEFENDANT

John Keepsake states:

I am a security guard. I am 30 years old. I have worked with “Secure for Sure” Security Company Limited for the past 3 years during which time I have been assigned to “The Uptown Mews” town house complex, a gated community. I work at the security post at the main entrance/exit gate where I monitor visitors entering and leaving the complex and ensure that no unauthorized persons enter the complex. Residents communicate with me at the post and vice versa by way of a telephone intercom system. I advise residents of visitors by way of the intercom system. My security company normally rotates guards at different locations but I have been at the “Uptown Mews” for this period because of the residents’ approval of and recognition of my performance.

I know the claimant otherwise known as “Ras Fire”. He is noted for his violent lyrics and for smoking ganja on stage. He has been arrested and fined for breaches of the Town and Communities Act (indecent language) and possession of ganja. Since moving into the complex I have received numerous complaints about bad words, noise, unruly visitors and ganja smoking from his premises. His townhouse is out of sight of the security post. It is also too far away to hear anything but extremely loud noise coming from that area of the complex. I have therefore not personally heard any disturbing noise from his premises, but it is possible that this has happened.

In early January 2008, the complainant was leaving the compound when I informed him politely that Mrs. Aloof had made a complaint about him. She had made the complaint to me the day before. He told me prepare for "war and just know that man lose him life in war" and sped off. I did not discriminate against the accused in any way. If indeed I did so he was free to make a complaint to the Management Committee of the complex or my security company but did not do so.

On 12 January 2008 I was on the day shift at the complex which runs from 7:00 am to 6:00 p.m. That morning I received a telephone complaint from Mrs. Priscilla Aloof about ganja smoking and noise from the premises of Mr. Thomas. She asked me to accompany her to the premises because she had previously complained to him personally and he had used abusive language to her. She had made a complaint to me previously about this. I agreed and took my baton as a precautionary measure.

Mrs. Aloof and I entered the premises together. As I entered I heard loud deejaying to the rear of the premises. We walked around the side of the house and on entering the back yard I saw and heard "Ras Fire" deejaying in full flight.

I asked him to turn down the volume but he refused. He did not ask us to leave his premises. Instead he approached me suddenly with the microphone stand in a fit of rage shouting "Babylon fi dead!" and raised it to strike me. I had no choice but to defend myself and struck him with the baton on the arm holding the microphone.

"Ras Fire" fell to the ground but was getting up quickly with the microphone stand as if to attack me again. His eyes were red and enraged and he was coming from the ground with the microphone stand shouting "Fire! Yuh dead now!!" He appeared to have been smoking ganja. I had to strike him again to the upper

back to keep him to the ground and from attacking me. I then left the yard and returned to the security post to call my base.

On reaching the security post I immediately telephoned my supervisor at base. I did not call the police because Mrs. Aloof telephoned the post and told me she had called the police.

When the police officer arrived, he was solely concerned with the condition of "Ras Fire". He took the baton. He did not wait to hear my version of events. I was telling him about the incident, the attack with the microphone stand and my witness Mrs. Aloof. He had no time for me.

Later they returned and arrested and charged me for causing grievous bodily harm with intent. It was only then that he allowed me to lead him to the microphone stand. Despite my urgings he did not attempt to interview Mrs. Aloof who approached him at that time to support my version.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: *John Keepsafe*

Date: 1/6/09

STATEMENT OF PRISCILLA ALOOF

IN THE SUPREME COURT OF JUDICATURE OF JAMAICA

CLAIM NO: HVC 3 OF 2009

BETWEEN	DANIEL THOMAS	CLAIMANT
AND	SECURE FOR SURE LTD	FIRST DEFENDANT
AND	JOHN KEEPSAFE	SECOND DEFENDANT

Priscilla Aloof states:

I am 35 years old. I am a divorcee, with custody of my two children; sons aged 7 and 10 years old. I am an Insurance Executive.

I live at Townhouse 14, “Uptown Mews” and have lived there since my divorce 2 years ago. I own the townhouse as it is part of a divorce settlement with my ex-husband, John Aloof, a well known businessman.

In early January 2008, the complainant moved into the townhouse next to mine. There was trouble on his arrival. There was constant loud music from his premises, his visitors were noisy and he had workmen there who were also noisy. Furthermore, I often smelled ganja coming from the premises.

So, a few days after enduring this disturbance I decided to introduce myself to my new neighbour. I went next door to do so because I did not have his telephone number. I politely introduced myself, and welcomed him to the neighbourhood. When I delicately broached the subject of the disturbance, he became verbally abusive and used Jamaican expletives. I left. I subsequently reported the matter to the security guard on duty at the security post at the main entrance/exit gate, namely John Keepsafe.

On January 12, 2008 in the morning I dropped off one of my children at school. I returned home to my younger child who was at home because he had the flu. I heard loud deejaying coming from next door at a time when my child had to rest. I called John Keepsafe at the security post and asked him to accompany me next door.

We entered the premises because no one responded to our calls at the gate. We followed the deejaying to the backyard of the premises. "Ras Fire" was deejaying with the microphone which was in the microphone stand. His eyes were red as if he was smoking ganja and I smelled ganja.

"Ras Fire" became extremely angry at our presence and he started abusing both of us. There was a very brief heated exchange between John Keepsafe and himself and suddenly "Ras Fire" rushed towards us with the microphone stand in his hand in a raised position. I rushed immediately to my home to call the police.

On reaching home I called the police and awaited their arrival after I sought advice from my attorney. I telephoned the police anonymously because I wished to speak to my attorney first and did not get through to him, before the call to the police. Later that day when the police went next door I went out to volunteer my side of the story. The policeman, Constable Samson said there had already been an arrest and so, if I wished to be a defence witness that would be my choice.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed: **Priscilla Aloof**

Date: 1/6/09