

27. I did not, however, tell him that he should be in prison. What I told him was that in some countries he would be in prison, not in Parliament, for the conduct in which he was involved. The Claimant asked me if I was saying that he is a crook and a criminal. I responded by saying that what he did was fraudulent. I did say that he was a political clown. He later responded by saying that I was a clown and that I only recently learnt how to curse. The Claimant told me that I did not know him. I responded by saying that I knew him well and that I was not frighten for him.

28. I deny that I asked Mr. Ronald Toppin what he had to show in the eighteen (18) years in which he has been a Member of Parliament.

29. The meeting ultimately ended after approximately four (4) hours at around 2.25 pm with first a vote as to whether we should hold a vote to choose a Leader of the Opposition at all and then a vote for such leader. It was ultimately decided that the vote would be by secret ballot. Ms. Mottley was ultimately elected to lead the Party in Parliament by majority vote.

30. As stated above, there was a lot of 'cross-talk' between many of us throughout the substantial part of the meeting. Many conversations were going on at the same time. Mr. Dale Marshall was generally unable to command any order or to control the meeting. In fact, he was operating his cellular telephone during the substantial part of the meeting.

31. Furthermore, I know that the Claimant, either himself and/or working together with others, caused around seventy-five (75) constituents of Saint James North to be joined as members of the BLP without their knowledge, written approval and/or written consent. These events took place particularly between the period of April to July, 2009 at the start of the process for the nomination of a candidate to contest that seat on the Party's behalf. I myself had already actively started to canvass among those constituents in Saint James North who were members of the BLP and who would therefore ultimately be entitled to vote at a nomination for the person who would be the