

Party's elections candidate. I was therefore fully aware and knowledgeable of what my opponents in that nomination process, including the Claimant, were doing.

32. The names of some of the constituents who did not sign the application forms submitted in their names to become members of the Party are disclosed in the List of Documents which has been filed on my behalf as a part of these pleadings. The forms each had a signature, ostensibly belonging to the applicant. However, I personally interviewed each of the approximately seventy-five (75) persons. They each denied having signed the respective form by virtue of which they were joined as a member of the Party.

33. It stands to reason that if these persons did not sign these forms, some person or persons forged their signatures. These forms were all submitted to the Party's secretariat either by the Claimant or by Mr. Douglas Skeete, the individual whom he was supporting to be named as the Party's elections candidate for the constituency, or by both of them for processing and for subsequent approval for Party membership of these constituents in whose names the respective applications were made. The Claimant is Mr. Skeete's cousin and was his extremely hands-on campaign manager. The Claimant was the unquestioned and ultimate director and decision maker of Mr. Skeete's campaign. No major decision was made in relation to the strategy of that campaign without the Claimant's knowledge and agreement. The Claimant was, indeed, Mr. Skeete's principal canvasser and took on the role, much moreso than Mr. Skeete, of approaching persons for support of his candidature during their canvassing.

34. All the forms about which complaint is made and which were submitted to the Party's secretariat had as proposers and seconders for membership persons who were and are an integral part of the Claimant's political team. Miss Pauline Lowe is, and has been, his constituency assistant for two decades or thereabouts. Miss Lisa Marshall is one of his strongest, most loyal supporters and, to my certain knowledge, regards him as a father figure. Mr. Simeon Belgrave is one of his longtime, most faithful supporters, canvassers and political platform speakers. Mr. MacDonald Skeete, Mr. Douglas Skeete's twin brother, is also one of his longtime, most dependable supporters,