Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

#### (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
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# FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<u>Defendants</u>
EXHIBIT	"JS/86"

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# WITNESS STATEMENT Criminal Procedure Rules, r. 16.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B URN Statement of: Zak BREDIN Age if under 18: 18+ (if over 18 insert 'over 18') Occupation: Police Officer This statement (consisting of 04) page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true. Signature: (witness) Date: 30/08/2022

On the 29/08/2022 between the hours of 2100hrs to 0700hrs on the 30/08/2022, I was on duty with a call sign of NU43 with a colleague PC 81595 HAMMOND. We were assigned scene guard duties on operation HAZEL in Thurrock Gray's, whereby we had to guard a scene where there was a tunnel under ground. This tunnel was on the grass verge off the A1090 south facing.

Between 0330hrs and 0400hrs I was sat in my duty vehicle in the driver's seat. I then noticed the metal fencing to the left of me was moving backwards and forwards. I then looked at the tree branches behind the fence and notice that they were not moving suggesting there was no wind which could cause this movement in the metal fence. My colleague then raised the alarm that someone had breached the police cordon, I immediately exited my vehicle and proceeded down the grass verge and this is when I first saw two people within 1 or 2 meters from the covered tunnel entry. As I was going down to the suspects, I heard the male suspect say 'WE ARE HERE TO CHECK THE STRUCTURE OF THE TUNNEL' which I persevered as an indirect acknowledgment that the Male suspect and female suspect knew the tunnel was in front of them and they wished to gain access to this tunnel. I then activated my body worn video which was on buffering prior. I grabbed the male suspect and PC 81595 HAMMOND grabbed the female suspect. We moved these two suspects up the grass verge and called for further assisted over the radio. The female suspect start to preach to officers about her motivation about protecting the environment and taking action to achieve this aim. Once the Duty Sgt arrived on scene, I was advised that a section 1 Stop Search under Police and criminal evidence act 1984 needed to be conducted to search for articles which could be used in the offence of criminal damage. I Conducted the search on the male party, I noticed in the bag during the search that the male party had supplies ranging from toiletries, long lasting food, Good Supply of water and medical blankets etc but no items were found on the male suspect which could be used to commit an offence. The male then gave a name of Callum GOODE and the female gave a name of Karan WILDIN. From a brief discussion with PC 81595 HAMMOND, similar items were found in Karen WILDIN'S bag.

We then moved WILDIN & GOODE to a safe location further down the road and this is where my suspicion that these two were 'just stop oil Protestor' turned into belief. GOODE remained silent throughout, but WILDIN continued to preach to officers of her motivation to achieve change in the government's policies around energy. Of note she stated that social media and the public turned

16/08/17	OFFICIAL	
Signature: \$\mathcal{D}_{1085}\$	Signature witnessed by:	
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against insulated Britain and referred to insulate Britain as 'THEM' rather than using the word 'US'. This suggested to me that both GOODE & WILDIN were 'Just Stop Oil Protestors'. WILDIN and PC 81663 GASSON were then engaging in casual conversation about laws around environmental protection. Of note in this conversation WILDIN did say that 'SHE KNOWS THE LAW AROUND ENVIRONMENTAL PROTECTION AS WE ARE ENVIRONMENTAL CAMPAIGNERS'. At this point I was of a strong belief that WILDIN & GOODE was defiantly a 'Just Stop Oil Protestor' I then ask PC 81663 GASSON if he had cautioned both WILDIN & GOODE to which he hadn't, at around 0440hrs I read the when caution to WILDIN with GOODE present and listening. WILDIN replied saying I understand, and GOODE remained silent. I said to GOODE the caution also applied to him of which he remained silent. The conversation between WILDIN and PC 81663 GASSON then came to an end.

I then Liaised with the Duty Sgt 75 BRACKETT and DS 76884 HARRISS and the decision was taken collectively that I would arrest both GOODE and WILDIN on suspicions of conspiracy to commit a public nuisance. I was made aware that both WILDIN & GOODE had been released from custody only 7 hours prior to this encounter. I conducted this arrest at 0455hrs, I went to re-read the caution to both WILDIN & GOODE however these words did not come out my mouth correctly. I had to correct myself, and I then read the when cation correctly to both GOODE and WILDIN of both GOODE and WILDIN understood. I gave them two code g's which was Prompt and Effective investigation by means of questioning in interview and to prevent further damage to property. Both GOODE and WILDIN were conveyed to GRAYS CUSTODY whereby the detention was authorised. Whist in custody WILDIN started to undress in the holding cell so the full-length photos which I will exhibit below of WILDIN is not the outer clothing which she was found in.

## The following was seized / taken whilst in Gray's custody from WILDIN possession at 0540hrs under <u>property reference – BD/031016/22 (Grays Police Station)</u>

Exhibit ZB01 – Android mobile phone

Exhibit ZB02 - she-wee

Exhibit ZB03 – outer camo trousers

Exhibit ZB04 – black Odewalt knee pads

Exhibit ZB05 – x2 snoods

Exhibit ZB06 – x2 thick outer socks

Exhibit ZB07 - headtorch

Exhibit ZB08 - camo waterproof outer coat

Exhibit ZB09 – bag of food

Exhibit ZB10 - x2 green gloves

Exhibit ZB11 – phone signal blocker

Exhibit ZB12 – EE sim card packaging

Exhibit ZB13 – Belkin portable charger

Exhibit ZB14 – toiletry bag

Exhibit ZB15 – electric toothbrush

Exhibit ZB16 – x2 lipstick

Exhibit ZB17 – mascara

Exhibit ZB18 - roll on deodorant

Exhibit ZB19 – disposable razor

Exhibit ZB20 – nail clippers

Exhibit ZB21 – manual toothbrush		
Signature: \$1085	Signature witnessed by:	
2010/11	OFFICIAL	

Exhibit ZB22 - tee tree oil

Exhibit ZB23 - wristwatch

Exhibit ZB24 – legal advice card

Exhibit ZB25 – Full Length photo of Female Suspect WILDIN

Exhibit ZB26 - Full Length photo of female Suspect WILDIN left side

Exhibit ZB27 – Full length Photo of female Suspect WILDIN Rear Side

Exhibit ZB28 - Full Length photo of female Suspect WILDIN Right Side

Exhibit ZB29 – Photo of phone seized from female Suspect WILDIN (Front Side)

Exhibit ZB30 – Photo of phone seized from female suspect WILDIN (Rear Side)

# The following was seized / taken whilst in Gray's custody from GOODE possession at 0536Hrs under property reference – BD/031018/22 (Grays Police Station)

Exhibit ZB31 - Pair of gloves.

Exhibit ZB32 - Dark green waterproof trousers.

Exhibit ZB33 - Dark grey zip hoodie

Exhibit ZB34 - Packet of digestives.

Exhibit ZB35 - 500ml water

Exhibit ZB36 - 500ml Morrisons water

Exhibit ZB37 – Black Wooley Hat

Exhibit ZB38 - Anti bac spray

Exhibit ZB39 - Anti bac hand gel

Exhibit ZB40 - Vegan multi vitamins

Exhibit ZB41 - X6 sanatisation tablets

Exhibit ZB42 - Nail brush

Exhibit ZB43 - Cutlery

Exhibit ZB44 - Toothpaste

Exhibit ZB45 - Tooth brush,

Exhibit ZB46 - Roll on anti-perspirant

Exhibit ZB47 – Imodiun Tablets (Entered on separate Property Ref BD/031020/22)

Exhibit ZB48 - Tweezers

Exhibit ZB49 - Wash bag

Exhibit ZB50 - Book

Exhibit ZB51 - Paracetamol

Exhibit ZB52 -Nature valley bar

Exhibit ZB53 - Almonds

Exhibit ZB54 - Clear and yellow bag 2

Exhibit ZB55 - Power pack and lead

Exhibit ZB56 - Foil blanket

Exhibit ZB57 - Note pad

Exhibit ZB58 - Head torch

Exhibit ZB59 - Coke bottle water

Exhibit ZB60 - Photo of male suspect GOODE Front facing

Exhibit ZB61 – Photo of male suspect GOODE rear facing

#### I can exhibit all officers body worn video as the following:

PC 81085 BREDIN BWV Footage – Exhibit ZB62

Signature: \$\instyle{\mathbb{Z}_108}\frac{\mathbb{Z}_108}{\mathbb{Z}_5}\tag{5}\tag{5}\tag{5}\tag{5}\tag{7}\	Signature witnessed by:

2010/11

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PC 81580 MARINER BWV Footage- Exhibit ZB63
PC 81595 HAMMOND BWV Footage – Exhibit ZB64
PC 80262 WATKINS BWV Footage – Exhibit ZB65
PC 81663 GASSON BWV Footage – Exhibit ZB66

81085

Signature: \$1085

Signature witnessed by:

2010/11

**OFFICIAL** 

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		<b>Defendants</b>
EXHIBIT "JS/87"		

## Christopher Hardy 14/01/1981

Address - No Fixed Abode

Contact Details - None Recorded



42/MR/17714/22 Wilful obstruction of the highway.

Circumstances of this investigation are HARDY has been detained by Police at 06:37 hours on the 23<sup>rd</sup> August 2022 at St Clements Way, Grays, Essex. At approximately 06:00 hours on the 23<sup>rd</sup> August HARDY attended St Clements way in company with nine other Just Stop Oil Direct Action Protesters. HARDY sat on the carriageway blocking all vehicular traffic. Police directed HARDY to leave and when he refused, he was arrested at approximately 06:40 hours and the road re-opened by approximately 08:00 hours. This protest disrupted vehicular traffic for 2 hours, however this protest was later identified to have been a diversionary tactic to allow 6 other Just Stop Oil Direct Action Protesters to occupy two pre-excavated tunnels. The disruption to this area would go on for another 2 weeks due to the occupied tunnels.

Arresting Officer Pc 75371 Winney. Arrest MG11 attached.

Evidential media form completed by Pc 1729 Walker, Exhibit PDW/9 attached.

Police Case material report to CPS MG5 has been attached detailing the particulars of the criminal case.

Result - Discontinued at court.

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	<b>Defendants</b>
EXHIBIT "JS/88"	

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WITNESS STATEMENT		
Criminal Procedure Rules, r. 16.2;Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B		
URN		
Statement of: Sam WINNEY		
Age if under 18: Over 18 (if over 18 insert 'over 18') Occupation: Police Constable 75271		
This statement (consisting of page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which know to be false, or do not believe to be true.		
Signature: (witness) Date: 23/08/2022		

On TUESDAY 23<sup>rd</sup> AUGUST 2022 I was on duty and in company with PC HARKNETT 597, SGT BAKER 74352, PC WALSH 79401, PC HANBURY 77722 and PC READ 77189 when we were asked to attend ST.CLEMENTS WAY, GRAYS in response to reports of a group of protesters blocking the main road.

On arrival I could see that there were 10 people sat in a row across the road in high visibility tops, holding orange banners displaying "JUST STOP OIL" and I noticed that some of the group had glued their hands to the road surface.

After few minutes there was a sufficient amount of police officers on scene to be able to deal with those protesters that weren't not glued to the floor and could be moved if they refused to move themselves. I was tasked by SGT BAKER 74352 to begin a 5 step appeal to invite the protesters to move themselves from the road voluntarily, I reminded them that they were breaking the law by obstructing a highway and asked them to leave the road but nobody moved. I then said that remaining seat could make them liable for arrest and invited them again to stand up and leave the road but nobody moved. I reminded them that refusal to move from the road will mean that we can use physical force to remove them from the road and that they could lose respect from their peers if they remain seated and again nobody moved, finally I asked if there was anything if I could say or do to get them to stand up and leave the road and nobody moved therefore at 0637hours I said to the group "PLEASE CAN I HAVE ALL OF YOUR ATTENTION, YOU ARE ALL UNDER ARREST ON SUSPICION OF OBSTRUCTING A HIGHWAY, YOU DO NOT HAVE TO SAY ANYTHING BUT IT MAY HARM YOU DEFENCE IF YOU DO NOT

Signature:	Signature witnessed by:	
16/08/17	OFFICIAL	

#### **OFFICIAL**

MG11 (Interactive)

Page 2 of 3

MENTION WHEN QUESTIONED SOMETHING WHICH YOU LATER RELY ON IN COURT AND ANYTHING YOU DO SAY MAY BE GIVEN IN EVIDENCE, THE REASONS FOR YOUR ARREST ARE FOR A PROMPT AND EFFECTIVE INVESTIGATION BY MEANS OF AN INTERVIEW ALSO TO PREVENT FURTHER IBSTRUCTION TO A HIGHWAY" to which no one made any reply.

I then witnessed my colleague approach the protesters to begin moving them from the road.

I will describe those that have been arrested as follows with a counter time from my Body worn footage identifying them as such: -

- Female 1 white female, 5ft 6in in height, slim build, dark ginger/red hair cut to shoulder length, wearing a blue top and blue cargo trousers, aged 50-60 years and carrying a blue bag – identified at 12.34
- Female 2 white female, 5ft 5in in height, slim build, blonde/grey hair, grey top, red and black trousers, red rimmed glasses aged 60-65 years. Identified at 13.26
- Male 1 white male, 5ft8in in height, slim build, short black hair, dark grey trousers, light grey shirt, grey walking boots, black rimmed glasses, slim face, aged 40 years and provided a name of David. Identified at 14.46 – this person was glued to the road
- Male 2 white male, 5ft 9in in height, medium build, black shirt with a white collar which would indicate he was a reverend, grey trousers, black glasses and provided a name of MARK, aged 65-70 years. – this person was glued to the road
- Female 3 white female, 5ft 5in in height, slim build, purple and blue shirt, navy blue trousers and grey frizzy shoulder length hair, aged 65-70years. Identified at 17.12
- Female 4 white female, 5ft 5in in height, very slim build, blonde/grey hair which was unkept, blue and white pattern shirt, blue jeans, carrying a white stick, orange lensed glasses aged 50-60 years. Identified at 18.12 this person was glued to the road.
- Female 5 white female, 5ft 6in in height, medium build, short white hair, green and white stripped top, light blue jeans, black glasses. Aged 70-75 years . identified at 19.10
- Female 6 white female, 5ft5in in height, medium build, yellow shirt, navy trousers, white short hair, aged 70-75 years and provided a name of WENDY. Identified at 20.12
- Male 3 white male, 5ft 10in in height, medium build, ginger hair with a receding hairline, red and blue chequered shirt, jeans, brown boots and blue bag, provided a name of SIMON. Identified at 20.50

Signature:	Signature witnessed by:
2010/11	OFFICIAL

#### **OFFICIAL**

Page 3 of 3

 Male 4 – white male, 5ft9in in height, short black hair, slim build, wearing all black clothing aged 40-45 and provided a name of Christopher HARDY date of birth 14/01/1981.

All of these people were recorded on my Body worn video and I named them verbally on my body worn video to match up with the descriptions given above for continuity and to assist in identification when they arrive at custody.

I assisted to in conveying Male 1, male 2, Female 3, Male 3 and Female 4 to Basildon Custody and my colleagues assisted in conveying Female 1, Female 2, Female 5, Female 6, Male 4 to Chelmsford custody where all their detentions were authorised.

I have the following items to produce as my exhibits:-

SW/01 - PC WINNEY Body worn video footage

SW/02 - 4 X small tubes of Super glue

SW/03 – 2 x orange banners with 'JUST STOP OIL' written in white and black writing

SW/04 – 2 x small tubes of super glue taken from Simon Reding

These have been booked into the Essex police property system under reference BB/030259/22.

These are my original notes made at Basildon police station.

Signature:	Signature witnessed by:	***************************************

2010/11

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<u>Defendants</u>
EXHIBIT "JS/89"	

#### Evidential Media Form - PDW/9

Reviewing Officer Name: PC 1729 Paul Walker Review date: Tuesday 27<sup>th</sup> September 2022

Review time start: 0915 hours Review time finish: 1200 hours

This form has been generated from the viewing of officers Body Worn Video.

This form has been generated to show the scene at St Clements Way, West Thurrock, Essex and the actions of the Just Stop Oil protesters involved.

To show continuity at the beginning of every media source used you will see the below – this is to ensure you as the reader can understand what the media is, who it is from, the date and duration. This will then show how the timeline has been formed and via what media source.

Source: BWV / Evidence gatherer footage / Custody image.

**BWV Clip Number:** 

Officer name (BWV/Evidence gatherer user):

Date Shown on footage: Axon Platform start time: Start time Shown on Footage: Real time (if different GMT):

Is there a delay in audio starting? Y/N

Duration of footage:

If yes how long?

Holmes Exhibit ref:

Duration of footage viewed from: Duration of footage viewed to:

AXON BWV Reference (8 digits):

Officer Exhibit Ref:

INTENTIONALLY BLANK

P. D. Walher PC1729 Paul Walker

Summary (Must have sufficient details to satisfy a review under provisions of CPIA) Consider screen captures and direct speech and include counter times.

Screen	Summary		
Display Time (NOT counter time)	Highlight any information requiring redacting/editing		
	Source: BWV – Arresting Officer.  BWV Clip Number: N/A  Officer name (BWV): PC 75271 Winney  Date Shown on footage: 23/08/2022 Axon Platform start time: N/A  Start time Shown on Footage: 06:26:15 Real time (if different GMT): N/A  Is there a delay in audio starting? Yes If yes how long? 59 Seconds  Duration of footage: 1 hour 50 minutes 43 seconds  Duration of footage viewed from: Start Duration of footage viewed to: Finish  AXON BWV Reference (8 digits): X60415993 Holmes Exhibit ref:  Officer Exhibit Ref: SW/01		
06:26:15	PC75271 Winney activated his BWV whilst approaching St Clements Way, West Thurrock, Essex where it was reported that a number of persons were sitting in the carriageway and obstructing the flow of vehicular traffic.  PC75271 Winney's GPS location map shows where this took place.		
06:27:20	Upon alighting from the marked police vehicle PC75271 Winney's BWV captures other police officers already on scene and in the process of removing pedal cycles that had been left lying in the carriageway. It can also be seen that there are a number of persons sitting in the carriageway and holding banners displaying the words 'Just Stop Oil' indicating that the persons are protesters from this group.		

O6:27:25 This image shows the protesters completely blocking the carriageway preventing its use by vehicular traffic travelling in either direction. Christopher Hardy's position in this group is indicated by the arrow.



O6:30:15 This image shows all 10 of the protesters, that would later be arrested, all seated in the carriageway with Christopher Hardy's position indicated by the arrow.



06:35:00

PC75271 Winney requests the attention of all of the protesters and then administers the five-step appeal requesting that they remove themselves from the carriageway and to the pavement whilst acknowledging that he is aware that a number of them have glued themselves to the road surface. None of the protesters takes any steps to voluntarily leave the carriageway. Christopher Hardy is indicated by the arrow.



06:37:18 PC75271 Winney informs all of the 10 seated protesters that they are under arrest on suspicion of causing an obstruction of the highway, cautioned and reasons for arrest provided.



O6:39:32 Christopher Hardy is removed from the carriageway by police officers. Having been raised from the ground he walks to the side of the carriageway. He is indicated by the arrow.

2022=08=23 06:89:892 00100
AXON BODY 3 X60A915993

O6:40:55 This image shows Christopher Hardy seated on the pavement after having been removed from the carriageway. He is indicated by the arrow.



06:48:08 For the purposes of his paperwork PC75271 Winney identifies Christopher Hardy as 'male 4' as he was yet to be identified. 2022-08-23 06:48:08 +0100 AXON BODY 3 X60415993 06:51:35 From documentation in his possession Christopher Hardy's identity is confirmed. INTENTIONALLY BLANK P.D. Walker PC1729 Paul Walker

Source: BWV – Escorting Officer.

BWV Clip Number: N/A

Officer name (BWV): PC 77722 Hanbury Date Shown on footage: 23/08/2022 Start time Shown on Footage: 06:26:02 Is there a delay in audio starting? Yes

Duration of footage: 2 hours 6 minutes 31 seconds

Duration of footage viewed from: Start AXON BWV Reference (8 digits): X60410203

Officer Exhibit Ref: NGH/01

Axon Platform start time: N/A Real time (if different GMT): N/A If yes how long? 59 Seconds

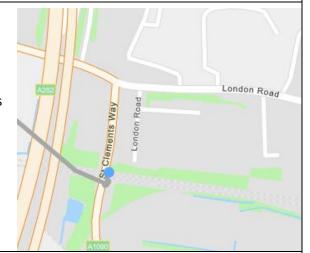
Duration of footage viewed to: Finish

Holmes Exhibit ref:

06:26:02

PC77722 Hanbury activated his BWV whilst approaching St Clements Way, West Thurrock, Essex where it was reported that a number of persons were sitting in the carriageway and obstructing the flow of vehicular traffic.

PC77722 Hanbury's GPS location map shows where this took place.

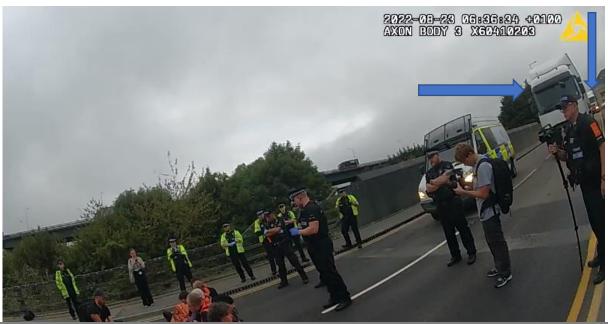


06:27:11

Upon alighting from the marked police vehicle PC77722 Hanbury's BWV captures other police officers already on scene and it can also be seen that there are a number of persons sitting in the carriageway and holding banners displaying the words 'Just Stop Oil' indicating that the persons are protesters from this group. It can also be seen that there are pedal cycles laying in the carriageway.



This image shows some of the vehicles that had been prevented from going about their business due to the presence of the protesters sitting in the carriageway. Two heavy goods vehicles can be seen to the right of the image indicated by the arrows.



O7:15:38 Christopher Hardy is pictured standing at the roadside on the pavement awaiting transfer to a marked police vehicle for conveyance to a police station custody suite. He is indicated by the arrow.



Christopher Hardy is pictured in the rear of a marked police vehicle awaiting conveyance to a police station custody suite.



08:12:42 In the custody suite at Chelmsford Police Station he confirms his name as Christopher Harder.



08:26:41 Another image of Christopher Hardy in the custody suite at Chelmsford Police Station minus the beanie hat that he had been wearing up to this point.



08:23:30 Christopher Hardy enters his cell within the custody suite at Chelmsford Police Station.



INTENTIONALLY BLANK

P. D. Walker PC1729 Paul Walker

About 0608 hours on Tuesday 23rd August 2022 police were called to St Clements Way, West Thurrock, Grays, Essex to reports of a number of persons blocking the carriageway.

Upon arrival police found 10 protesters from the 'Just Stop Oil' campaign. 8 were already sitting in the carriageway and there were also 2 pedal cycles laying in the carriageway. One of these protesters was Christopher Hardy.

Upon examination it was found that 4 of the protesters had glued one of their hands to the road surface. Christopher Hardy was not one of these persons.

Christopher Hardy offered only passive resistance and had to be physically lifted to his feet but then walked to the side of the carriageway and on to the pavement.

Along with the other 9 protesters, Christopher Hardy had been arrested on suspicion of causing an obstruction of the highway before his removal from the carriageway.

Final protester was removed from the carriageway at about 0802 hours.

The image here is an image of Christopher Hardy obtained during the custody procedure where he was allocated the custody reference number 42CY/2490/22.



#### **Initial Disclosure Assessment of footage**

For disclosure I have considered whether there is any material which might reasonably be considered capable of undermining the case for the prosecution against the accused, or of assisting the case for the accused. Any material required to be supplied under paragraph 7.3 of the code.

Supply Details:

P.D. Walker PC1729 Paul Walker Signature of reviewing officer:

Time/Date of completion: 1200 hours on Tuesday 27<sup>th</sup> September 2022

#### **Check List: (tick when complete)**

- 1. Update the DS of your completion.
- 2. Notify OIC/Disclosure officer of anything evidential or meeting disclosure test
- 3. Has officer provided a statement producing footage?
- 4. Has BWV Officer Exhibited BWV correctly:
- 5. Has BWV Officer Exhibiting BWV saved footage correctly?
- 6. Ensure footage burnt to disc
- 7. Ensure exhibit is on HOLMES
- 8. Place review document into MIR Submitted for Holmes folder for registration.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

#### (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
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- (226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

# FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/90"	

## David Nixon 24/06/1986

Address - I

#### Contact Details - None Recorded

42/MR/18216/21 Wilful obstruction of the highway.

Circumstances of this investigation are NIXON has been detained by Police at 08:20 hours on the 30<sup>th</sup> September 2021 at Junction 30, Mar Dyke, M25, Grays, Essex. At approximately 08:10 hours on the 30<sup>th</sup> September NIXON attended a section of the M25 motorway located at junction 30. NIXON and eight other Insulate Britian Protesters blocked this section of the Motorway by gluing themselves to the road surface and each other.

Arresting Officer Pc 75387 Ornellas, Arrest MG11 attached.

Pc 73908 Al-Rawi captures BWV footage of the protesters, Still images attached.

Police Case material report to CPS MG5 has been attached detailing the particulars of the criminal case.









Result – Fine £150, Costs £100, Surcharge £34.

#### 42/MR/17714/22 Wilful obstruction of the highway.

Circumstances of this investigation are NIXON has been detained by Police at 06:37 hours on the 23rd August 2022 at St Clements Way, Grays, Essex. At approximately 06:00 hours on the 23rd August NIXON attended St Clements way in company with nine other Just Stop Oil Direct Action Protesters. NIXON sat on the carriageway blocking all vehicular traffic. Police directed NIXON to leave and when he refused, he was arrested at approximately 06:40 hours and the road re-opened by approximately 08:00 hours. This protest disrupted vehicular traffic for 2 hours, however this protest was later identified to have been a diversionary tactic to allow 6 other Just Stop Oil Direct Action Protesters to occupy two pre-excavated tunnels. The disruption to this area would go on for another 2 weeks due to the occupied tunnels.

Arresting Officer Pc 75371 Winney. Arrest MG11 attached.

Evidential Media Form Completed by Pc 306 Forster, Exhibit YF/23 attached.

Police Case material report to CPS MG5 has been attached detailing the particulars of the criminal case.

Result – Discontinued at court.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<u>Defendants</u>
EXHIBIT "JS/91"	

## Evidential Media Form - YF/23 - David NIXON - 23/08/2022

**Reviewing Officer Name: Yari FORSTER** 

Review date: 27/09/2022

Review time start: 12:39 Review time finish: 17:15hrs

This form has been generated from the viewing of officers Body Worn Video.

This form has been generated to show the scene at St Clements Way, West Thurrock, Essex and the actions of the Just Stop Oil protesters involved.

To show continuity at the beginning of every media source used you will see the below – this is to ensure you as the reader can understand what the media is, who it is from, the date and duration. This will then show how the timeline has been formed and via what media source.

Source: BWV / Evidence gatherer footage / Custody image.

**BWV Clip Number:** 

Officer name (BWV/Evidence gatherer user):

Date Shown on footage: Axon Platform start time: Start time Shown on Footage: Real time (if different GMT):

Is there a delay in audio starting? Y/N

If yes how long?

Duration of footage:

Duration of footage viewed from: Duration of footage viewed to:

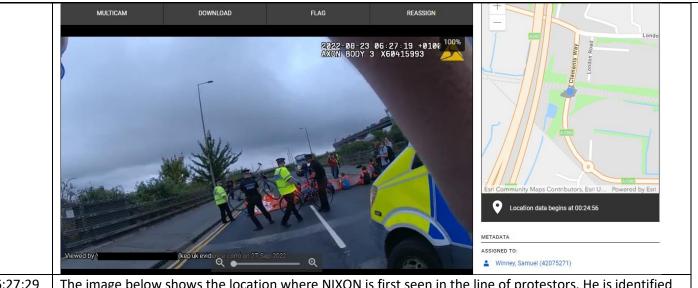
AXON BWV Reference (8 digits): Holmes Exhibit ref:

Officer Exhibit Ref:

Summary (Must have sufficient details to satisfy a review under provisions of CPIA)

Consider screen captures and direct speech and include counter times.

Screen Display Time (NOT counter time)	Summary  Highlight any information requiring redacting/editing	
	Source: BWV – BWV Clip Number: Officer name (BWV): PC 75271 WINNEY Date Shown on footage: 23/08/2022 Start time Shown on Footage: 06:26:15 Is there a delay in audio starting? Yes Duration of footage: 1hr, 50 minutes and 43 second Duration of footage viewed from: Start AXON BWV Reference (8 digits): X60415993 Officer Exhibit Ref: SW/01	Axon Platform start time: Real time (if different GMT): If yes how long? 59 ds  Duration of footage viewed to: 07:45:47 Holmes Exhibit ref:
06:27:19	PC 75271 WINNEY arrives on scene along ST CLEMENT'S WAY, GRAYS, where protestors are seen sat across the highway blocking any traffic from passing. The image below shows bicycles being removed from in front of the protestors. The image also contains the BW mapping.	



The image below shows the location where NIXON is first seen in the line of protestors. He is identified with a blue arrow



O6:27:39 The images below show NIXON moving around before he sits down amongst the group of protestors. NIXON identified with blue arrows.





06:29:07 Image below shows a lorry, index PJ22 HWC, at a stand still and unable to pass along ST CLEMENT'S WAY.



06:30:14 Image below shows where NIXON is sat amongst the "JUST STOP OIL" protestors. NIXON identified with a blue arrow.



O6:35:05 PC 75271 WINNEY addresses the group of protestors and goes through the 5-step appeal.

The image below shows NIXON recording the police with his mobile phone. NIXON identified with a blue arrow



06:36:55 Image below shows NIXON responding to PC WINNEY after he advised the group that physical force would be used to remove them if they did not remove themselves.
 06:39:50 The image below shows NIXON with one hand glued to the road surface, meaning he had glued himselves.

The image below shows NIXON with one hand glued to the road surface, meaning he had glued himself after police attendance, and had walked around before sitting amongst the group. The second image shows the tube of superglue by NIXON's hand.





07:41:39 Image below shows NIXON being escorted away from the road towards a marked police vehicle having had his hand de-bonded from the road surface. NIXON shown with a blue arrow



07:44:20 Image shows NIXON on-board marked police vehicle awaiting conveyance to custody.



Below images are of a close-up of NIXON at scene of his arrest, next to his custody image which was taken later that same day.





On 23<sup>rd</sup> August 2022 Police attended ST. CLEMENT'S WAY, GRAYS to reports of persons blocking the highway. Persons were wearing orange tabards and orange banners with "JUST STOP OIL" written on them. Subject NIXON was amongst these persons whom then sat across the highway obstructing traffic from passing through. NIXON was seen walking around upon police arrival and eventually sat amongst the group near to the middle of the road.

	,
	PC 75271 WINNEY addressed the group at 06:35hrs and went through the 5-step appeal with no positive response from the group. At 06:37hrs, PC WINNEY addressed the group again and arrested them for obstruction of the highway. He then fully cautioned him and provided the necessities for the arrest to be; prompt and effective investigation by means of an interview and to prevent further obstruction of the highway. NIXON was then seen to have his hand glued to the road surface. At 06:41hrs, referred to NIXON on his BW as Male 1. At 06:48hrs NIXON provided his name to PC WINNEY as "DAVID" The Protest Removal Team then attended to NIXON to de-bond his hand from the road surface. NIXON was then escorted to a marked police vehicle to await conveyance to Basildon custody, arriving at 09:22hrs where his detention was authorised and he was assigned custody number 42BY/2708/22  Some media footage viewed has not been viewed in full, the duration of the footage time viewed will be detailed. The reason for this is not all media footage is relevant, also it is not proportionate to view the length of all footage, after the main areas have been captured.
	length of all footage, after the main areas have been captured.
1	

#### **Initial Disclosure Assessment of footage**

For disclosure I have considered whether there is any material which might reasonably be considered capable of undermining the case for the prosecution against the accused, or of assisting the case for the accused. Any material required to be supplied under paragraph 7.3 of the code.

Supply Details:

Signature of reviewing officer: <

Time/Date of completion: 17:15hrs – 27/09/2022

#### Check List: (tick when complete)

- 1. Update the DS of your completion.
- 2. Notify OIC/Disclosure officer of anything evidential or meeting disclosure test
- 3. Has officer provided a statement producing footage?
- 4. Has BWV Officer Exhibited BWV correctly:
- 5. Has BWV Officer Exhibiting BWV saved footage correctly?
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Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

### IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

#### (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
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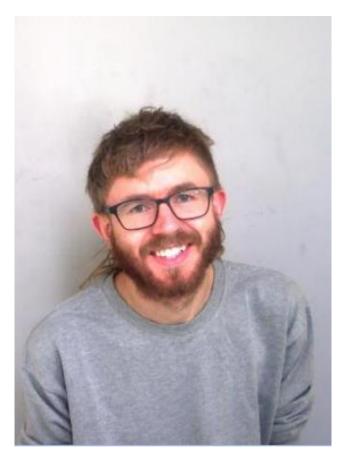
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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<u>Defendants</u>
EXHIBIT	"JS/92"

Address –

Contact Details - None Recorded



42/MR/17877/22 intentionally / recklessly cause a public nuisance.

Circumstances of this investigation are HOWLETT has been detained by Police at 15:45 hours on the 4th September 2022 on St Clements Way, Grays, Essex. On the morning of the 23rd August 2022 HOWLETT and five other Just Stop Oil direct action protesters occupied two pre-excavated tunnels. One on St Clements way and the other on Stoneness Road. HOWLETT and two others occupied Tunnel 1 on St Clements Way, the tunnels were constructed in a way that the entire road had to be closed initially preventing all vehicular traffic entering the industrial estate that could only be accessed by these two roads. St Clements way was partly opened to a limited amount of traffic controlled by temporary traffic light contraflow system. Police negotiators worked for 12 days to encourage the group to leave without success. HOWLETT was arrested on the 4th September when negotiations succeeded and HOWLETT left the tunnel he had occupied.

Arresting officer Pc 2981 Paddon, Arrest MG11 Attached.

Police Case material report to CPS MG5 has been attached detailing the particulars of the criminal case.

Video Compilation exhibit JLS/VC/04 attached.

Result – Guilty verdict at Crown Court sentencing has not been completed at this time.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

### IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

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## FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/93"	

Page 1 of 2

WITNESS STATEMENT Criminal Procedure Rules, r. 16.2;Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B					
	URN				
Statement of: Matt PADDON					
Age if under 18: OV18 (if over 18 insert 'over 18')	Occupation: PC	2981			
This statement (consisting of 2 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.					
Signature:	(witn	ess)	Date:	04/09/2022	

I confirm that today Sunday 4<sup>th</sup> September 2022 I was working in full uniform in company with PC 78024 Green PC 77189 Read PC 451 Cornwell and SGT 72436 Wigington in a fully marked police vehicle VG2A and was deployed to ST CLEMENTS WAY GRAYS to assist with a road closure where protestors from just stop oil had dug a tunnel under the road.

At about 15:00hrs I was briefed by SGT Wigginton who explained that there were three protestors inside the tunnel and that they were due to come out soon, as a result I waited near the hole that had been dug and waited for further instructions. At 15:45 hrs one of the protestors came out of the hole and at this time I arrested him for criminal damage and also recklessly or intentionally causing a public nuisance, I cautioned him to which he made no reply and then explained that the arrest was for the prompt and effective investigation and to prevent contact with co-suspects. I placed handcuffs on the male in the rear stack position and double locked them to prevent his escape and for officer safety, as we were on uneven ground. I then walked the male, who I now know as Joe HOWLETT to a nearby ambulance and searched him to which I found nothing significant, however did not that there was a mobile phone in his right shorts pocket. Now that we were on flat ground, and I had searched HOWLETT I moved the cuffs to the front stack position and double locked them.

HOWLETT was then conveyed to Grays custody where we arrived at 16:20 hrs and his detention was authorised later. Whilst in custody I seized a mobile phone from HOWLETT, Samsung Mobile Phone at 18:00 MJP/1 and later booked this into the property system BD/031715/22. I also took full length photos of HOWLETT which I produce as MJP/2.

Signature:	7	Signature witnessed by:	
16/08/17		OFFICIAL	

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MG11 (Interactive)

Page 2 of 2

Throughout the incident I had my bodycam recording which I produce as exhibit MJP/3.

Signature witnessed by:

Signature: ....

2010/11

**OFFICIAL** 

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

### IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

#### (1) MADELINE ADAMS

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/94"	

# Video Compilation HOWLETT, JOHNSON & GONZALIZTRIMMER

HOWLETT, JOHNSON and TRIMMER occupied the St Clements Way Tunnel between the 23<sup>rd</sup> August 2022 and the 4<sup>th</sup> September 2022. Due to them spending most of their time concealed within the confines of the tunnel there is limited footage of the men, this compilation has been combined to include all three subjects.



# Exhibit JLS/SG3/09 BWV clip from SG/3 A/Ins 536 Gray

St Clements Way, Thurrock, Essex 09:51 Hours on the 23<sup>rd</sup> August 2022

A/Ins 536 Gray identifies where the occupants of Tunnel 1 have penetrated the rail network fencing.

Original Exhibit SG/03 run time - 51:14 Clip Start Time - 09:51:26 Clip Finish Time - 09:52:38 Clip Duration - 01:11





## Exhibit JLS/SG5/10 BWV clip from SG/5 A/Ins 536 Gray

St Clements Way, Thurrock, Essex 12:03 Hours on the 23<sup>rd</sup> August 2022

Footage shows the officer crossing the rail line with Network Rail who have put a stop on the line. The officer locates personal items and food stores hidden behind fresh spoil. The officer then follows a short path up the embankment towards St Clements Way where he locates Tunnel 1 and initiates communication with the occupants.

Original Exhibit SG/05 run time - 51:30 Clip Start Time - 12:03:20 Clip Finish Time - 12:07:20 Clip Duration - 04:00





# Exhibit JLS/SG5/11 BWV clip from SG/5 A/Ins 536 Gray

St Clements Way, Thurrock, Essex 12:08 Hours on the 23<sup>rd</sup> August 2022

Footage shows the officer calling down to the occupants of Tunnel 1 and speaking to JOHNSON who identifies himself as CARLOS. JOHNSON is asked what the purpose is of him being in the tunnel.

Original Exhibit SG/05 run time - 51:30 Clip Start Time - 12:08:49 Clip Finish Time -12:11:02 Clip Duration - 02:13





# Exhibit JLS/SG5/12 BWV clip from SG/5 A/Ins 536 Gray

St Clements Way, Thurrock, Essex 12:11 Hours on the 23<sup>rd</sup> August 2022.

Footage shows JOHNSON requesting an additional air supply, lighting and communications systems.

Original Exhibit SG/05 run time - 51:30 Clip Start Time - 12:11:48 Clip Finish Time - 12:13:16 Clip Duration - 01:28





# Exhibit JLS/NJ01/13 BWV clip from NJ/01 Pc 79767 Jenkinson

St Clements Way, Thurrock, Essex 13:08 Hours on the 23<sup>rd</sup> August 2022

Footage shows the officer arriving at a road closure and being asked questions from road users who are unable to access this area of Thurrock due to the tunnels forcing Police to close the road.

Original Exhibit NJ/01 run time - 07:21 Clip Start Time - 13:08:20 Clip Finish Time - 13:10:40 Clip Duration - 02:20





## Exhibit HS/01 full BWV from Pc 77586 Shelton

St Clements Way, Thurrock, Essex 23:55 Hours on the 23<sup>rd</sup> August 2022.

Footage shows the officer talking with JOHNSON who is standing in the down shaft to Tunnel 1.

Original Exhibit HS/01 run time - 01:05 - Clip Start Time - 23:55:05 Clip Finish Time - 13:10:40 Clip Duration - 01:05





## Exhibit KB/03 Clip 8 Full Evidence Gatherer Video Pc Baker

St Clements Way, Thurrock, Essex 10:34 hours on the 24<sup>th</sup> August 2022.

The footage shows the evidence gatherer officer walking along St Clements Way showing the disruption that Tunnel 1 is causing to this stretch of the road.

Exhibit KB/03 Clip 8 Full footage run time - 05:30





# Exhibit JLS/SG10/14 BWV clip from SG/10 A/Ins 536 Gray

St Clements Way, Thurrock, Essex 15:00 Hours on the 26<sup>th</sup> August 2022

Footage shows the officer walking along St Clements Way, his BWV (Body Worn Video) captures the immediate traffic build up in this area shortly following St Clements Way being closed.

Original Exhibit SG/10 run time - 01:27:12 Clip Start Time - 15:00:31 Clip Finish Time - 15:02:57 Clip Duration - 02:26





# Exhibit JLS/SG10/14 BWV clip from SG/10 A/Ins 536 Gray

St Clements Way, Thurrock, Essex 17:16 Hours on the 26<sup>th</sup> August 2022

Footage shows the officer talking to Essex Fire and Rescue Specialist rescue team. The Officer and Rescue team are seen discussing the tunnel spoil, bags of GEOFOAM, the shoring within the tunnels and the occupants.

Original Exhibit SG/11 run time - 17:54 Clip Start Time - 17:16:37 Clip Finish Time - 15:23:16 Clip Duration - 06:38





Exhibit JW.20220904.1700 (1) Just stop oil Opensource download by DC 42 78323 Weeks.

#### YouTube Video

First of two videos uploaded to YouTube by JSO, the video shows Sam JOHNSON in the tunnel across various days of his occupation talking to either the camera or professionals at the tunnel entrance.

Video Duration - 08:46



#### https://share.uk.evidence.com/share/gUWkniNg

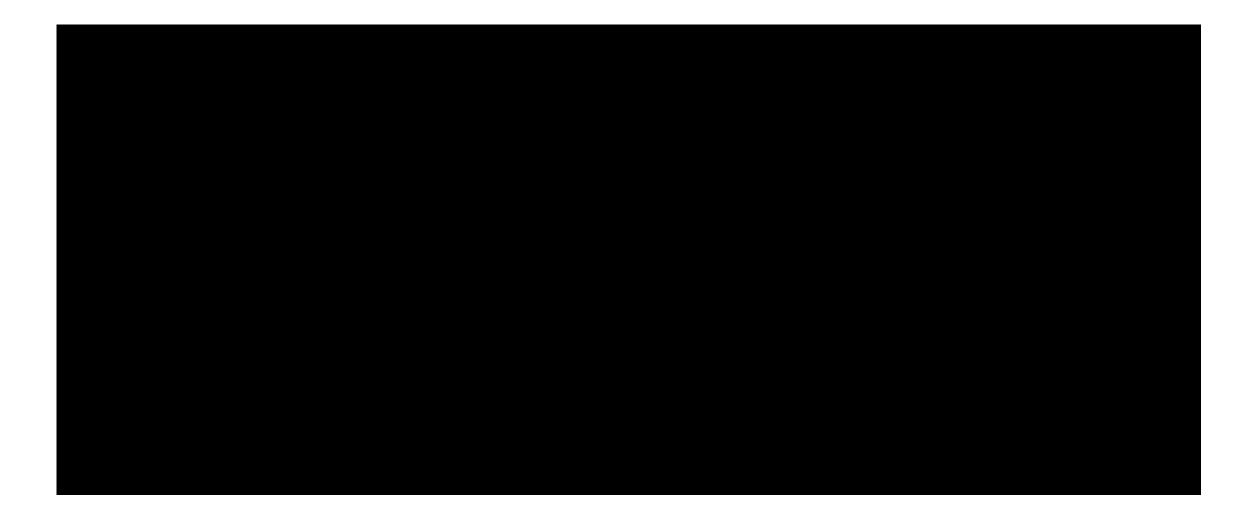


Exhibit JW.20220904.1700 (2) Just Stop Oil Opensource download by DC 42 78323 Weeks.

#### YouTube Video

Second of two videos uploaded to YouTube by JSO, the video shows Joe HOWLETT talking to the camera and Sam JOHNSON in the tunnel across various days of his occupation talking to either the camera or professionals at the tunnel entrance. The video also shows other JSO members working to keep the road closed from the road surface.

Video duration - 07:20



#### https://share.uk.evidence.com/share/Fltogk6H



#### Exhibit SK/02 Just Stop Oil Opensource download by DC 42 75891 Kyle

**Twitter Video** 

Video uploaded to Twitter by JSO, the video shows Joe HOWLETT inside the tunnel talking about the climate emergency and asking for people to attend Westminster on the 1<sup>st</sup> October.

Video duration - 01:30





### Exhibit DTW/01 Full BWV footage from PC 80624 WYATT

St Clements Way, Thurrock, Essex 20:46 hours on the 30<sup>th</sup> August 2022

The footage shows the occupants of Tunnel 1 breaking through the road surface with an electric tool. The breaching point is almost exactly where highways had marked the furthest end of the tunnel indicated by the Yellow X.

Exhibit DTW/01 Full BWV footage run time - 01:40





# Exhibit JLS/JRP/08 BWV clip from JRP/01 Pc 74098 Rodreguez-Perez

St Clements Way, Thurrock, Essex 11:39 hours on the 1<sup>st</sup> September 2022

The footage shows Thurrock Council Environmental officers working around the entrance of Tunnel 1. The workers have been sent to clear up the discarded rubbish around the tunnel entrance. One of the protestors can be heard talking to the officer about debris falling back into the hole.

Original Exhibit JRP/01 run time 06:44 - Clip Start Time - 11:39:10 Clip Finish Time - 11:40:29 Clip Duration - 01:18





#### Exhibit JLS/AW01/07 BWV clip from AW/01 Pc 76882 Walker

St Clements Way, Thurrock, Essex 08:18 hours on the 1<sup>st</sup> September 2022

The footage shows a Thurrock Council Environmental Enforcement Officer engaging with JOHNSON who answers to the name of CARLOS. JOHNSON can be seen at the bottom of the down shaft of Tunnel 1. JOHNSON takes some time to activate the video recorder on his phone before the Enforcement Officer verbally informs him Thurrock Council are applying for a Possession Order and the protestors are trespassing.

Original Exhibit AW/01 run time - 03:28 Clip Start Time - 08:18:01 Clip Finish Time - 08:20:19 Clip Duration - 02:17





#### Exhibit JLS/MN02/05 - BWV clip from MN/02 Pc 2111 Noone.

St Clements Way, Thurrock, Essex 10:51 hours on the 2<sup>nd</sup> September 2022.

The footage shows the officer engaging with JOHNSON who can be seen sitting in the tunnel wearing a blue T-shirt. The officer conducts a welfare check on all of the protesters within the tunnel.

Original Exhibit MN/02 run time - 41:28 Clip Start Time - 10:51:39 Clip Finish Time - 10:55:20 Clip Duration - 03:40





### Exhibit JLS/MN02/06 - BWV clip from MN/02 Pc 2111 Noone.

St Clements Way, Thurrock, Essex 11:02 hours on the 2<sup>nd</sup> September 2022

The footage shows the officer standing at the entrance to the down shaft of Tunnel 1, JOHNSON can be seen sitting in the tunnel now wearing an Orange T-shirt. JOHNSON is heard and seen taking part in an interview in relation to his occupation of the tunnel.

Original Exhibit MN/02 run time - 41:28 Clip Start Time - 11:02:09 Clip Finish Time - 11:04:08 Clip Duration - 01:59





#### Exhibit JLS/SJ02/04 - BWV clip from SJ/02 Pc Jewell.

St Clements Way, Thurrock, Essex 11:02 hours on the 2<sup>nd</sup> September 2022

The footage shows the officer standing at the entrance to the down shaft of Tunnel 1, JOHNSON can be seen sitting in the tunnel now wearing an Orange T-shirt. JOHNSON is heard and seen taking part in an interview in relation to his occupation of the tunnel.

Original Exhibit MN/02 run time - 41:28 Clip Start Time - 11:02:09 Clip Finish Time - 11:04:08 Clip Duration - 01:59





#### Exhibit JLS/SG01/03 - BWV clip from SG/01 Pc Green.

St Clements Way, Thurrock, Essex 15:43 hours on the 4<sup>th</sup> September 2022.

Shows the officer arresting JOHNSON as he exits Tunnel
1. The officer repeated her arrest as JOHNSON was
shouting up to the JSO media team at the top of the hill
and posing for photos. Cuffs are applied and JOHNSON is
escorted to the footpath where he is searched and seen
by medics.

Original Exhibit SG/01 run time - 42:21 Clip Star Time - 15:43:38 Clip Finish Time - 15:12:03 Clip Duration - 01:20





## Exhibit JLS/MJP3A/15 - BWV clip from MJP/3A Pc 2981 Paddon.

St Clements Way, Thurrock, Essex 15:43 hours on the 4<sup>th</sup> September 2022

Shows JOHNSON as he exits Tunnel 1 and JOHNSON's focus on the JSO media team at the top of the hill.

Original Exhibit MJP/03 run time - 42:20 Clip Start Time - 15:43:56 Clip Finish Time - 15:44:29 Clip Duration - 00:33





#### Exhibit JLS/MJP3A/16 - BWV clip from MJP/3A Pc 2981 Paddon.

St Clements Way, Thurrock, Essex 15:44 hours on the 4<sup>th</sup> September 2022

Shows HOWLETT as he exits Tunnel 1 and being detained by the officer. HOWLETT starts to shout up to the JSO media team at the top of the hill, however the officer requests his attention and arrests him. HOWLETT is escorted up the hill where he is searched and seen by paramedics.

Original Exhibit MJP/03 run time - 42:20 Clip Start Time - 15:44:41 Clip Finish Time - 15:47:25 Clip Duration - 02:54





## Exhibit JLS/ARC01/01 - BWV clip from ARC/01 PC CORNWELL.

St Clements Way, Thurrock, Essex 15:44 hours on the 4<sup>th</sup> September 2022

Shows the officer arresting GONZALEZ-TRIMMER as he exits Tunnel 1, applies cuffs and escorts GONZALEZ-TRIMMER to the footpath where he is searched.

Original Exhibit ARC/01 run time - 25:41 Clip Start Time - 15:44:49 Clip Finish Time - 15:47:16 Clip Duration - 02:27





### Exhibit JLS/SG01/20 - BWV clip from SG/01 Pc Green.

St Clements Way, Thurrock, Essex 15:53 hours on the 4<sup>th</sup> September 2022

Shows the officer escorting JOHNSON from the paramedic's vehicle where he has just received a medical check-up to a waiting marked Police car, JOHNSON is placed on board and conveyed to Grays Police Station.

Original Exhibit SG/01 run time - 42:21 Clip Start Time - 15:53:19 Clip Finish Time - 15:55:47 Clip Duration - 01:42





#### Exhibit JLS/SG01/21 - BWV clip from SG/01 Pc Green.

St Clements Way, Thurrock, Essex 16:08 hours on the 4<sup>th</sup> September 2022.

Shows the officer escorting conveying JOHNSON to Grays Police Station arriving at 16:08. JOHNSON is led from the police vehicle into the custody block where he waits just outside of the holding room for space to become available.

Original Exhibit SG/01 run time - 42:21 Clip Start Time - 16:08:00 Clip Finish Time - 16:11:28 Clip Duration - 03:28





#### Exhibit JLS/MJP3A/17 - BWV clip from MJP/3A Pc 2981 Paddon.

St Clements Way, Thurrock, Essex 16:00 hours on the 4<sup>th</sup> September 2022.

Shows HOWLETT finishing his medical examination by paramedics, he is then escorted by the officer to the waiting police carrier. HOWLETT is loaded onboard for transport to custody.

Original Exhibit MJP/03 run time - 42:20 Clip Start Time - 16:00:07 Clip Finish Time - 16:00:43 Clip Duration - 00:36





#### Exhibit JLS/MJP3A/18 - BWV clip from MJP/3A Pc 2981 Paddon.

St Clements Way, Thurrock, Essex 17:52 hours on the 4<sup>th</sup> September 2022.

Shows HOWLETT being escorted up to the custody desk at Grays Police station. The officer providing the arrest details, HOWLETT's detention is authorised then he is asked to provide his name.

Original Exhibit MJP/03 run time - 01:00:01 Clip Start time - 17:52:07 Clip Finish Time - 17:55:52 Clip Duration - 03:44





#### Exhibit JLS/MJP3/19 - BWV clip from MJP/3 Pc 2981 Paddon.

St Clements Way, Thurrock, Essex 17:52 hours on the 4<sup>th</sup> September 2022.

Shows HOWLETT being escorted up to the custody desk at Grays Police station. The officer providing the arrest details, HOWLETT's detention is authorised then he is asked to provide his name.

Original Exhibit MJP/03 run time - 01:00:01 Clip Start time - 17:52:07 Clip Finish Time - 17:55:52 Clip Duration - 03:44





#### Exhibit JLS/ARC01/02 - BWV clip from ARC/01 PC CORNWELL.

St Clements Way, Thurrock, Essex 16:06 hours on the 4<sup>th</sup> September 2022.

Shows GONZALEZ-TRIMMER being escorted from the paramedics following his welfare check and being placed into the back of a police carrier for transport to custody.

Original Exhibit ARC/01 run time - 25:41 Clip Start Time - 16:06:57 Clip Finish Time - 16:07:37 Clip Duration - 00:40





Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

### (1) MADELINE ADAMS

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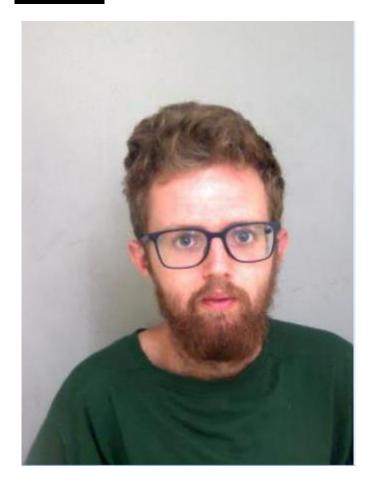
(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/95"	

### John Jordan 06/02/1997

Address - No Fixed Abode

Contact Details –



42/MR/17900/22 Tampering with Motor Vehicle.

Circumstances of this investigation are JORDAN has been detained by Police at 17:15 hours on the 29<sup>th</sup> August 2022 at Oliver St Clements Way, Grays, Essex. JORDAN has arrived at St Clements Way at approximately 19:30 hours on the 28<sup>th</sup> Augst in company with other Just Stop Oil Direct action protesters. Once at that location JORDAN has targeted and stopped a fuel tanker with the assistance of the other protesters. Once the vehicle had come to a halt JORDAN has climbed onto the lorry cab and refused to move. JORDAN was negotiated with for the rest of the 28<sup>th</sup> August and was eventually arrested at 17:15 hours on the 29<sup>th</sup> August, JORDAN refused to leave the Lorry cap on arrest and had to be removed by specialist officers at approximately 00:30 hours on the 29<sup>th</sup> Augst This protest caused disruption to this area for approximately 35 hours.

Arresting officer Pc 71784 Owen, Arrest MG11 Attached.

Evidential Media Form completed by Pc 1729 Walker, Exhibit PDW/18 attached.

Police Case material report to CPS MG5 has been attached detailing the particulars of the criminal case.

Results - £500 Fine, £310 Costs, £200 Surcharge.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

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Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

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- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)
- (226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

# FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

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(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<u>Defendants</u>
EXHIBIT "JS/96"	

### **OFFICIAL**

### WITNESS STATEMENT

Criminal Procedure Rules, r. 16.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B

URN
Statement of: Si OMEN
Age if under 18: Over 18 (if over 18 insert'over 18') Occupation: Police Constable 7178
This statement (consisting of page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything in it, which know to be false, or do not believe to be true.
Signature: Date: 29/e1/2e27
Tick if witness evidence is visually recorded (supply witness details on rear)
At 18:00hm / was on duty in full Police uniform
and part of OPPERATION MAZEC, a deployment into GREIS, ESSEX To Police the "Just STEP oic" pretesters
ESSEX To Police the Just STEP OIL" pretesters
who had infultrated the location and day Junnel Dereath
a read. At this time I was using calbys "HAZEL 3",
Agained 19:30hs / news via my rades that several
profester had attended the tunnel location on St
Clements Way Grajs Upop arrival / withoused 3 Kennels
attempt to glue thinklus to the found newered, were
prevented from doing a sy offices from my carrier.
As These femals that been detained I walked from
This area of St Clenenb Wy justion with Landon Kd
Towards Clivers Road In the Jocakun Several Mr
"JSG" protester had been detained by offices however the
was one muli who wan't and was sal ontop of a teal
tanker bearing the index of DETIHUG This mule was
oxcured 25 year old weary down inned glusses. He had
Messy light brain hur and a missy light Svan board. He was weaving a mastered coloured headed top a yluck
Traises from Knew Mis male as Dany, John, JORDAN,
11751
Signature: Signature witnessed by:

**OFFICIAL** 

### **OFFICIAL**

Page No. 2 of 3

Continuation of Statement of: Si Owen

On Twitter page, in which he features on 23/08/12, in
On Twitter page, in which he leatures on 23/08/22 in
a tunnel in WARWICKSMIRE.
a Tunnel in WARWICKSMIKE.  I initiated in conversation with proport who was  calling himself "SEAN".
Calling himself "SEAN"
1 de () de 1 de
SAVE THE LIVES OF MY FRIENDS AS ESSEX POLICE PLEFUSE TO
SHUT THE ROAD. I'LL CALLY COME DOWN CARE I HAVE
REASSURANCE THAT THIS ROAD WILL REMIAN SUUT" At
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that he was carrying crown 40,000 likes of feel
Member of the public and workers from withing olivers
Kood, whe had finished work but were presented from
leaving the crea du to the rand closures storted surreinly
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Voicing their duplewise with the situation and pleading with
him to come down. This fell on deal eup and Johns
refused to come down.
Around 23:40hi, officers from PRT-working from hights town attended and no sconer had they made contract with Jorpan
he alread his what hered to the top at the carb at the
he glued his gyht hunel to the top of the cab of the
The PRT were also de-bord trained so removed him from
The cap with column euro
At 00:30ho 00:00hm) offices hundred me a hum has
At go:30ho oo:00hrs) offices hundred me a burn bag and a fetty of water that we taken him from Jorosh.  Signature: 1784 Signature witnessed by:
Signature: Signature witnessed by:
Oignature will isseed by

Page No 3/ of 3

Continuation of Statement of: Jiwen

I searched this bum buy withich contained fail blankets
pair of plusses his pusspert bunk carel battery pack,
immodium Tublets and Tabaco / www also Kunchel a
used tube of super-glue, also taken from prenAN.
Sexed the luter as Sofi and sealed it into evidence Day M28881234.
M28881734,
At OG: 30ho, one JORDAN had been Sufly remared from the tanky I suid to him John for MRE NO
from the fanky I said to him John you have No
UNER AMEST FOR TAMPERING WITH A MOTER VENICE"
then cachened him to which he mule no rophy 1
Went on to Say "THE NECESSITY FOR THE AKREST IS TO
PREVENT FUETHER OBSTUCTION OF THE HIGHWAY, TO ASCENTAND DETAILS AND TO PREVENT DISAPPEARANCE."
I Then conveyed lossan to GRAJ's custody where his detention was authorised by the aspects sergont.
1178/
Olyginal notes much between 01:18th and 02:43ths on Monory 29th August Lozz whilit at Grents Police Station
Monory 29" August Lozz whilst at Grents Pelice Station
7:78/
Signature Signature witnessed by:

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

### (1) MADELINE ADAMS

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/97"	

### Evidential Media Form - PDW/18

Reviewing Officer Name: PC1729 Paul Walker

Review date: Wednesday 12<sup>th</sup> October 2022 to Friday 14<sup>th</sup> October 2022 and Monday 17<sup>th</sup> October 2022

Review time start: 1025 hours on Wednesday 12<sup>th</sup> October 2022 Review time finish: 1320 hours on Monday 17<sup>th</sup> October 2022

This form has been generated from the viewing of officers Body Worn Video.

This form has been generated to show the scene at St Clements Way, West Thurrock, Essex and the actions of the Just Stop Oil protesters involved.

To show continuity at the beginning of every media source used you will see the below – this is to ensure you as the reader can understand what the media is, who it is from, the date and duration. This will then show how the timeline has been formed and via what media source.

Source: BWV / Evidence gatherer footage / Custody image.

**BWV Clip Number:** 

Officer name (BWV/Evidence gatherer user):

Date Shown on footage: Axon Platform start time: Start time Shown on Footage: Real time (if different GMT):

Is there a delay in audio starting? Y/N

Duration of footage:

If yes how long?

Holmes Exhibit ref:

Duration of footage viewed from: Duration of footage viewed to:

AXON BWV Reference (8 digits):

Officer Exhibit Ref:

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P.D. Waller PC1729 Paul Walker

Summary (Must have sufficient details to satisfy a review under provisions of CPIA) Consider screen captures and direct speech and include counter times.

Screen	Summary			
Display Time (NOT counter time)	Highlight any information requiring redacting/editing			
	Source: BWV – First officer on scene.  BWV Clip Number: None Officer name (BWV): PC77883 Gunshon Date Shown on footage: 28/08/2022 Axon Platform start time: N/A Start time Shown on Footage: 19:35:58 Real time (if different GMT): N/A Is there a delay in audio starting? Yes Duration of footage: 1 hours 37 minutes 7 seconds Duration of footage viewed from: Start Duration of footage viewed in relation to another person arrested by this officer).  AXON BWV Reference (8 digits): X60418502 Holmes Exhibit ref: Officer Exhibit Ref: None provided at time of review.			
19:35:58	PC77883 Gunshon activated his BWV whilst on St Clements Way, West Thurrock, Grays, Essex where protesters from the 'Just Stop Oil' protester group had obstructed the highway causing vehicles to stop and as a result one protester had climbed on to the top of a fuel tanker whilst another attempted to use a drill on one of the rear tyres of the vehicle.  PC77883 Gunshon's GPS location map shows where this took place.			
19:38:22	Whilst making his way to the rear of the fuel tanker to deal with another protester that had been detained by members of the public, PC77883 Gunshon's BWV captures images of John Jordan on top of the selection of the lander registration DC7111VC			
	the cab of fuel tanker registration DE71HVG.  2022-08-25 19:856:22 10100 AXON BODY 8 X60416502			

19:38:34 Another view of John Jordan on top of the cab of fuel tanker registration DE71HVG whose driver had been forced to stop due to the actions of protesters.



19:53:26 This image shows the rear of the fuel tanker that had been forced to stop by the actions of the protesters and on to which John Jordan had climbed and shows it to be displaying the registration DE71HVG.



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P.D. Walker PC1729 Paul Walker

 $Source: BWV-Officer\ on\ scene.$ 

BWV Clip Number: None

Officer name (BWV): PC77545 Moore Date Shown on footage: 28/08/2022 Start time Shown on Footage: 19:47:24 Is there a delay in audio starting? Yes

Duration of footage: 2 hours 13 minutes 7 seconds

Duration of footage viewed from: Start AXON BWV Reference (8 digits): X6040568W

Officer Exhibit Ref: None provided at time of review.

PC77545 Moore activated his BWV whilst on St Clements Way, West Thurrock, Grays, Essex where protesters from the 'Just Stop Oil' protester group had obstructed the highway causing

vehicles to stop and as a result one protester had climbed on to the top of a fuel tanker whilst another attempted to use a

drill on one of the rear tyres of the vehicle.

PC77545 Moore's GPS location map shows where this took

place.

19:47:24

Axon Platform start time: N/A Real time (if different GMT): N/A If yes how long? 59 Seconds

Duration of footage viewed to: Finish

Holmes Exhibit ref:



19:47:24 First image captured when PC77545 Moore activates his BWW. Image shows the tractor unit of the fuel tanker on to which John Jordan had climbed. The tractor unit can be seen to be displaying the registration DE71HVG. John Jordan can just be seen at the top of the image underneath the date/time information.



19:47:33 This image shows John Jordan on the top of the tractor unit of the Tesco fuel tanker, registration DE71HVG, whose driver had been forced to stop the vehicle in the road due to the actions of the protesters. In the background behind this vehicle can be seen another fuel tanker and a private vehicle whose drivers had been prevented from continuing their journeys due to the actions of the protesters.



19:49:32 John Jordan can be seen on the top of DE71HVG and in this image he is seen using his mobile phone and appears to be videoing himself as he can be heard to be talking but the volume level makes his comments inaudible. In the background the headlights of more vehicles whose drivers have been forced to discontinue their journeys can be seen as they join the line of stationary vehicles.



19:51:08 to 19:51:54 Another police officer joins PC77545 Moore (from other footage recorded later this is identified to be PC71784 Owen). PC71784 Owen informs PC77545 Moore that he recognises John Jordan as a person who had recently come out of a tunnel on another nearby road.

PC71784 Owen calls up to John Jordan saying "YOU'VE JUST GOT OUT OF A HOLE HAVEN'T YOU". John Jordan "UH".

PC71784 Owen "YOU GOT OUT OF A HOLE AND ON TOP OF A TRUCK".

John Jordan "I DID. I CAME TO SAVE THE PEOPLE HERE BECAUSE THE COUNCIL AND THE POLICE DECIDED THAT ALLOWING PEOPLE IN HEAVY GOODS VEHICLES TO DRIVE OVER AN UNSUPPORTED TUNNEL WAS A GOOD IDEA"

PC71784 Owen "WHEN DID YOU GET OUT OF YOUR HOLE".

John Jordan "I DON'T KNOW, BUT YOU CAN CHECK MY RECORD (inaudible)".

PC71784 Owen "WELL COME DOWN THEN AND WE'LL DO THAT".

John Jordan "I WOULD BUT UNFORTUNATELY THE COUNCIL DOESN'T BELIEVE THAT (inaudible) WHAT HAPPENS NOW SO (inaudible)".

PC71784 Owen "WHAT'S YOUR NAME YOUNG MAN".

John Jordan "YOU CAN CALL ME SHAUN". He makes some comments about the name that he has supplied but they are largely inaudible.



19:52:50 John Jordan again appears to be videoing himself using his mobile phone. As previously he can be heard to be talking but the volume is again at such a level that his comments are inaudible.



John Jordan continues to appear to be videoing himself using his mobile phone which has been continuous since the previous entry with the volume of his comments making them inaudible. In this image a number of driver's that have been prevented from continuing their journeys can be seen gathered in the road behind the fuel tanker upon which John Jordan has climbed. It can also be seen that there now appears to be three fuel tankers in the visible queue along with private motor vehicles.



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P. D. Walker PC1729 Paul Walker

19:56:39 John Jordan engages in a conversation with both PC77545 Moore and PC71784 Owen however a large to amount of what he says is inaudible, but the odd comments can be heard. 19:58:20 John Jordan "AS A POLICE OFFICER ITS YOUR JOB TO (inaudible) CAUSING HARM. YES". PC71784 OWEN "TO A DEGREE, YES". John Jordan "DO YOU THINK A SEVENTY (inaudible) TANKER LANDING ON SOMEONE'S HEAD WOULD CAUSE HARM". PC77545 Moore "AND ALSO EXPERTS HAVE COME OUT AND SCANNED THE GROUND AND THEY'RE MORE THAN HAPPY THAT IT'S FINE TO BE OPEN". John Jordan makes a comment but it is inaudible. PC77545 Moore "WELL I'LL TAKE EXPERTS OPINION OVER PEOPLE". John Jordan interrupts "(inaudible) TONNAGE OF SOIL (inaudible)". PC77545 Moore "NO, NO, IT'S BEEN SCANNED". John Jordan "(inaudible) IT OUGTA BE CLOSED". PC77545 Moore "I RESPECTFULLY DISAGREE WITH YOU". John Jordan "THAT'S WHY I'M HERE". PC71784 Owen "(inaudible) WHAT WILL GET YOU DOWN SHAUN, WHAT'S THE, WHAT'S THE, I KNOW WHAT THE ULTIMATE END GAME IS". John Jordan "(inaudible) TODAY (inaudible) SAFE (inaudible) TOADY I'M SAVING MY FRIENDS". John Jordan then returns to interacting with his mobile phone. 20:00:33 One of the drivers at the rear of the fuel tanker calls out "MIGHT BE A GOOD IDEA MATE NOT TO USE YOUR PHONE ON TOP OF THERE. (inaudible) COULD GO BANG". tο 20:07:00 John Jordan "YER, I'M REALISING THAT" Driver "UH". John Jordan "I'M REALISING THAT". Driver "YOU REALISE THAT". John Jordan "I'M REALISING THAT". Driver "YOU REALISE THAT". John Jordan "(inaudible) JUST SO YOU'RE AWARE THE REASON I'M ACTUALLY DOING THIS, THERE'S CURRENTLY TUNNELERS GOING UNDERNEATH THE ROAD THAT HAVE BEEN THERE FOR WEEKS. THE POLICE HAVE BEEN MADE AWARE OF THEIR PRESENCE AND HAVE CONTINUED TO ALLOW YOUR DRIVERS TO KEEP GOING ON THERE. IF ONE OF THOSE VEHICLES COLLAPSES A SINK HOLE AND YOUR DRIVERS GOING TO DIE TO". During the conversation the driver walked up to the fuel tankers tractor unit. Driver "SO WHY DON'T THEY COME OUT THE TUNNEL THEN. PROVED THE POINT AIN'T YOU". John Jordan "NOT REALLY NO". Driver "THE OTHER END OF THE ROAD'S SHUT (inaudible) CO-OP, AMAZON A LOT OF PEOPLE WHO WORK ROUND HERE. LIKE THERE'S NO WAY IN OR WAY OUT IS THERE FOR PEOPLE". John Jordan makes a number of political statements and then "PRE-WARNED AND OBVIOUSLY AT THIS STAGE NOW DRIVERS ARE IN DANGER. WE'LL GET BLAMED IF THE ROADS COLLAPSE. IT'S MY FRIENDS DOWN THERE. IF THESE TUNNELS COLLAPSE, THEY'LL BLAME US. WE'LL GET RUN IN FOR GROSS NEGLIGENCE, HOMICIDE AND WHATEVER ELSE THEY WANT TO THROW AT US, ALL BECAUSE THEY REFUSE TO CLOSE THE ROADS. SO I'M NOT WILLING TO PUT YOUR DRIVERS AT RISK, I'M NOT WILLING TO PUT OTHER WORKERS AT RISK, NOT WILLING TO PUT POLICE OFFICERS AT RISK, THAT'S WHY I'M HERE. I WAS ACTUALLY OVER THE ROAD AT A DIFFERENT TUNNEL WHERE THE POLICE DID THE SAME THING. WE DIDN'T HAVE THE MANPOWER SO WE ABANDONED THOSE TUNNELS (inaudible) IT WASN'T SAFE SO WE ALLOWED THE POLICE TO FILL THEM IN. SO WE VOLUNTARILY CAME OUT". The driver and John Jordan then have a discussion over him having a 'proper' job and the affects on him

(John Jordan) getting a criminal record. John Jordan's response to this is inaudible. John Jordan goes on

to make political and environmental comments.



By this time a number of other drivers had walked up to where this conversation was going on. One of these other drivers then says "SO YOU THINK WHAT YOU ARE DOING IS ACTUALLY HELPING THE WORLD".

John Jordan's response is inaudible.

Other driver "SO YOU THINK YOU'RE HELPING THE WORLD SITTING UP THERE".

John Jordan "CURRENTLY MY MAIN CONCERN IS YOUR DRIVERS AND MY TUNNELERS DOWN BENEATH. THE REASON I'M DOING THIS IS".

A number of other drivers then make various comments and there is a lot of overtalking of each other which makes the conversation inaudible.



20:08:36 to 20:19:18 Despite the earlier conversation with one of the drivers in relation to safety issues around using his mobile phone whilst on the top of the fuel tanker, John Jordan continues to interact with his mobile phone including making phone calls and possible videos.

The volume at which John Jordan speaks in any phone calls or videos is such that the BWV does not pick it up and although he can be heard to be talking the content of the communications is inaudible.





20:40:09 After finishing one of his telephone communications John Jordan appears to use his mobile phone as if signalling someone by flashing the light on the mobile phone on and off a number of times.



20:55:30 PC77545 Moore walks along St Clements Way to a point between the fuel tanker, upon which John Jordan had climbed, and the next vehicle back along the road whose driver had been forced to stop as the protesters had abandoned their pedal cycles in the road.



John Jordan continues to make what appear to be videos whilst he sits on the top of the tractor unit of the fuel tanker. The conversation remains at a level that the BWV cannot pick up the content of the communication, but he can be heard to be talking.



21:33:05 During a radio communication PC77545 Moore states "I HAVE DEFINITELY SEEN GLUE".

Drivers of some of the vehicles that had been prevented from using the road and were now walking past the fuel tanker verbally vent their frustration towards John Jordan about what he was doing. He does respond but this is inaudible.

Three of these drivers can be seen along the bottom of this image.



21:38:50 Drivers verbally express their frustration to PC77545 Moore about what the protesters had done and that this situation was still going on over two hours after it had started.

21:57:02 to 21:59:13 A number of the frustrated drivers are now stood around the front of the fuel tanker involved in conversation with John Jordan.



Whilst appearing to justify his actions to the frustrated drivers (most of which is inaudible) John Jordan says "WE DUG THE TUNNELS (inaudible) WE CALLED THE POLICE, WE TOLD THEM WHERE WE WERE AND WHAT WE WERE DOING (inaudible)".

PC77545 Moore "SO OUT OF INTEREST WHY ARE YOUR FRIENDS NOT COMING OUT IF THEY'RE THAT CONCERNED FOR THEIR OWN SAFETY".

John Jordan "COZ IT DOESN'T STOP THE SITUATION (inaudible)".

PC77545 Moore "IF THEY COME OUT OF THE TUNNEL WE CAN FILL IN THE TUNNEL IF THAT'S YOUR WORRY. WHY WON'T THEY DO THAT.

Most of John Jordans response is inaudible apart from "WE ABANDONED ONE'S UP NORTH (inaudible) AND THERE WERE STILL VEHICLES DRIVING OVER EVEN THOUGH WE WERE OUT OF IT".

PC77545 Moore "YER COZ IT GETS FILLED IN. IT GETS FILLED IN RIGHT AWAY".

John Jordan "I'VE BEEN IN A TUNNEL MYSELF".

PC77545 MOORE "SO YOU'RE AVOIDING THE QUESTION COZ YOU KNOW IF YOUR FRIENDS COME OUT IT GETS FILLED IN".

John Jordan "WHEN I COME OUT I SEEN VEHICLES STILL COMING PAST (inaudible). YOU TELL ME, YOU SECURE FOR ME, YOU SECURE FOR ME THAT YOU WILL BLOCK THE ROAD FOR THE NEXT TWELVE HOURS TO SECURE AND DO A PROPER INVESTIGATION UNDER THAT TUNNEL BEFORE YOU FILL IT IN, I WILL GET OFF THIS TANKER. I TELL YOU WHAT YOU'RE BLAMING ME. YOU GO, GET THAT SECURED, YOU

GET TWELVE HOURS (inaudible) DO A PROPER INVESTIGATION AND A PROPER ONE. NOT ONE THAT JUST MEASURES THE AMOUNT OF DIRT OUTSIDE THE HOLE. I WILL GET DOWN".



22:00:31

PC77545 Moore turns off his BWV as he walks away from the scene having been replaced by PC71784 Owen.

Source: BWV – Arresting Officer. BWV Clip Number: None (Clip 1 of 6) Officer name (BWV): PC71784 Owen Date Shown on footage: 28/08/2022 Axon Platform start time: N/A Start time Shown on Footage: 19:51:02 Real time (if different GMT): N/A Is there a delay in audio starting? Yes If yes how long? 10 Seconds Duration of footage: 1 hour 17 seconds Duration of footage viewed from: Start Duration of footage viewed to: Finish AXON BWV Reference (8 digits): X6040917N Holmes Exhibit ref: Officer Exhibit Ref: None provided at time of review. 19:51:02 PC71784 Owen activated his BWV whilst on St Clements Way, West Thurrock, Grays, Essex where protesters from London Road the 'Just Stop Oil' protester group had obstructed the highway causing vehicles to stop and as a result one protester had climbed on to the top of a fuel tanker whilst another attempted to use a drill on one of the rear tyres of the vehicle. PC71784 Owen's GPS location map shows where this took place. 19:51:02 This image shows John Jordan standing on the top of the tractor unit of the fuel tanker displaying the registration DE71HVG whose driver had been forced to stop the vehicle due to the actions of protesters. 2022-03-23 19:51:02 +0100 AXON BODY 8 X604091711

19:51:14 John Jordan is talking as the sound on the BWV is activated but his comments are inaudible.

PC71784 Owen "WHEN DID YOU GET OUT OF YOUR HOLE".

19:51:45 John Jordan "I DON'T KNOW BUT YOU CAN CHECK MY RECORD (inaudible)".

PC71784 Owen "WELL COME DOWN THEN AND WE'LL DO THAT".

John Jordan "UM, I WOULD BUT UNFORTUNATELY THE COUNCIL DOESN'T BELIEVE THAT (inaudible)".

PC71784 Owen "WHAT WAS YOUR NAME YOUNG MAN".

John Jordan "UM, YOU CAN CALL ME SHAUN".

PC71784 Owen "SHAUN".

to

John Jordan makes a comment but it is inaudible.



19:53:27 This image shows John Jordan kneeling on the top of the tractor unit of the fuel tanker whilst interacting with his mobile phone.

In the background can be seen another fuel tanker whose driver had been forced to stop his vehicle due to the protester's actions.

There can also be seen a group of drivers gathered in the road and on the pavement who had also been prevented from continuing their journeys due to the actions of the protesters.

Another protester is also seen laying in the road just behind the fuel tanker



19:54:24 This image shows another fuel tanker whose driver had been forced to stop due to the actions of the protesters ahead of him and behind his vehicle can be seen other vehicles whose drivers had been prevented from continuing their journeys. The drivers of these vehicles can be seen gathered in, and at the side of the road.

Two pedal cycles that the protesters had abandoned in the road can be seen and are indicated by the arrows.

The police officer in the middle foreground of this image is standing over another protester who was laying in the road after having been prevented from drilling the rear tyres of the fuel tanker that John Jordan had climbed on top of.



19:55:30 The driver of fuel tanker registration DE71HVG, upon which John Jordan had climbed, shows PC71784 Owen his vehicles load sheet that records that the vehicle was carrying a total of 40,000 litres of petrol and diesel.



During a radio communication PC71784 Owen informs the control room operator that John Jordan was showing him a pot of glue and confirms that at that time John Jordan was not glued to the top of the fuel tanker.



19:56:36 PC71784 Owen calls up to John Jordan "IS THAT GLUE IS IT".

to John Jordan after a few seconds replies "YES".

19:58:20 PC71784 Owen says something that is inaudible.

John Jordan "YES IT IS" whilst at the same time holding up his right hand.





19:56:36 PC71784 Owen calls up to John Jordan "IS THAT GLUE IS IT".

to John Jordan after a few seconds replies "YES".

19:58:20 PC71784 Owen says something that is inaudible.

John Jordan "YES IT IS" whilst at the same time holding up his right hand. (Pictured).

PC71784 Owen "YES IT IS. WONDERFUL".

John Jordan makes a comment but it is inaudible which prompts PC71784 Owen to say "I CAN'T HEAR YOU, SAY AGAIN".

John Jordan "I SAID I WISH I WASN'T HERE. I WAS PLANNING ON DOING A CHICKEN (inaudible) BUT UNFORTUNATELY YOU'RE TRYING TO KILL OUR ACTIVISTS SO".

PC71784 Owen "I'M TRYING TO KILL YOU'RE ACTIVISTS".

John Jordan "Hey".

PC71784 Owen "I'M TRYING TO KILL YOU'RE ACTIVISTS".

John Jordan "AS A POLICE OFFICER ITS YOUR JOB TO AVOID CAUSING HARM. YES".

PC71784 Owen "TO A DEGREE YER".

John Jordan "DO YOU THINK A SEVENTY (inaudible) TANKER LANDING ON SOMEONE'S HEAD WOULD CAUSE HARM".

PC71784 Owen "WELL IT DEPENDS, WHEN PEOPLE PUTTING THEMSELVES IN HARMS WAY. PLAY SILLY GAMES, WIN SILLY PRIZES DON'T YOU, SOMETIMES, BUT".

John Jordan replies but it is inaudible.

PC77545 Moore (another police officer present) "EXPERTS HAVE COME OUT AND SCANNED THE GROUND AND THEY'RE (inaudible) IT'S FINE TO BE OPEN".

John Jordan replies but it is inaudible.

PC77545 MOORE ''(inaudible) TAKE EXPERTS OPINION OVER PEOPLE".

John Jordan "THE EXPERTS OPINION WAS BASED ON THE TONNAGE OF SOIL (inaudible)".

PC71784 Owen "SO WHAT WILL GET YOU DOWN SHAUN. WHAT'S THE, WHAT'S THE, I KNOW WHAT THE ULTIMATE END GAME IS".

John Jordan "(inaudible) TO STOP ALL NEW LICENSING IN THE UK. TODAY (inaudible) SAFE".

PC71784 "RIGHT, GOTCHA".

John Jordan "(inaudible) SAVING MY FRIENDS".

PC71784 Owen "ULTIMATELY THAT THE, RIGHT, OK".

PC71784 Owen then walks away from this scene and returns to the other scene on St Clements Way at the junction with London Road.



### 20:01:18

As PC71784 Owen walks back along St Clements Way his BWV captures a number of parked vehicles whose drivers had been prevented from continuing their journeys due to the actions of the protesters. (The two vehicles parked immediately behind the heavy goods vehicle are marked police vehicles). One private vehicle can be seen to be turning around in the road.

The junction with London Road can be seen in the distance. A number of fuel tankers and other heavy goods vehicles were parked along London Road as they were being prevented from using St Clements Way due to the action of the protesters.



### 20:02:48

PC71784 Owen is approached by a male who states that he works for the Daily Mail and that he handles the distribution of the newspaper for the whole country. He checks the situation and what access he may be able to have to his workplace as it may have implications for his job and employees. He states that if he is not able to get his vehicles in and out of his depot then he is going to have to make arrangements to move 'copy' to other print centres and re-route his drivers.

20:33:13 to 20:37:37 These images show a view along London Road in both directions where a number of fuel tankers and other heavy goods vehicles that needed to use St Clements Way had been forced to park due to the actions of the protesters.







20:38:38

There is a conversation between police and what appears to be transport fleet organisers, whereby they identify that they are diverting their vehicles to car parks of local superstores and other nearby industrial areas to wait until they can again use St Clements Way to complete their journeys to the businesses that occupy the industrial estate that their drivers were attempting to get to.



20:51:20 PC71784 Owen turns off his BWV.

INTENTIONALLY BLANK

P.D. Walker PC1729 Paul Walker

Source: BWV - Arresting Officer. BWV Clip Number: None (Clip 2 of 6) Officer name (BWV): PC71784 Owen Date Shown on footage: 28/08/2022 Start time Shown on Footage: 22:11:24 Is there a delay in audio starting? Yes

Duration of footage: 2 minutes 1 second

Duration of footage viewed from: Start AXON BWV Reference (8 digits): X6040917N

Officer Exhibit Ref: None provided at time of review.

Axon Platform start time: N/A Real time (if different GMT): N/A If yes how long? 3 Seconds

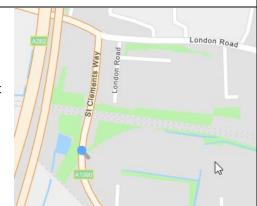
Duration of footage viewed to: Finish

Holmes Exhibit ref:

### 22:11:24

PC71784 Owen activated his BWV for the second time whilst on St Clements Way, West Thurrock, Grays, Essex where he was monitoring the actions of John Jordan one of the protesters from the 'Just Stop Oil' protester group that had obstructed the highway causing vehicles to stop and as a result John Jordan had climbed on to the top of a fuel tanker whilst another attempted to use a drill on one of the rear tyres of the vehicle.

PC71784 Owen's GPS location map shows where this took



### 22:11:25

PC71784 Owen initiates a conversation with John Jordan by asking "YER, SO, YOUR OBJECTIVE IS THE SAFETY OF YOUR FRIENDS, COLLEAGUES, ASSOCIATES, IS THAT RIGHT".

### 22:13:18

John Jordan "AH, SO, NO NOT JUST LIKE OBVIOUSLY"

PC71784 Owen "FUNDAMENTALLY TONIGHT I MEAN, I KNOW, I KNOW YOUR BIGGER AGENDA". John Jordan "(inaudible) BIG PICTURE".

PC71784 Owen "OH ALRIGHT".

John Jordan "I'VE BEEN TALKING TO ONE OF THESE LORRY DRIVERS, THEY DIDN'T EVEN KNOW (inaudible)".

PC71784 Owen "YER, YER, YER".

John Jordan "(inaudible) BECAUSE YOU'RE NOT INFORMING PEOPLE OF THE DANGER".

PC71784 Owen "YER".

John Jordan "YOU DON'T CARE FOR THE ACTIVISTS THAT ARE DOWN. THAT'S FINE IF YOU DON'T LIKE JUST STOP OIL I GET THAT".

PC71784 Owen "(inaudible) NO, NO, NO, IT'S NOT".

John Jordan "YOU'RE ALSO RISKING THE LIVES OF THESE DRIVERS EVERY SINGLE DAY AS YOU KNOW THE VIDEO SENT TO YOUR HEAD OFFICE (inaudible) TUNNAL COLLAPSING EVERY TIME ONE OF THESE VEHICLES GOES OVER".

PC71784 Owen "I MEAN. OBVIOUSLY I CAN'T SEE ANY EVIDENCE OF THAT ON THE ACTUAL ROAD ITSELF. I'M NOT A STRUCTURAL ENGINEER SO I CAN'T COMMENT BUT".

John Jordan "THE BASE OF THAT TUNNEL RIGHT NOW AND LOOK AT THE TARMAC THAT IS BEING HANDED UP".

PC71784 Owen "WELL THAT COULD BE OLD TARMAC THEY'VE DUG UP, I DON'T KNOW. THERE'S NOTHING THAT'S COME OFF THE ROAD".

John Jordan "IF YOU DON'T KNOW THEN WHY RISK (inaudible)".

PC71784 Owen "BECAUSE I'M NOT A STRUCTURAL ENGINEER. WHY RISK TUNNELLING ANYWAY".

John Jordan "YOU KNOW YOU'RE PUTTING PEOPLE AT RISK. WHY (inaudible) RISK".

PC71784 Owen "WELL LOOK SHAUN THIS IS MY POINT NOW I WAS GETTING TO. THE RISK NOW, SO IF THIS ROAD IS CLOSED BECAUSE OF THE STRUCTURAL INTEGRITY OF THAT ROAD AND WE CLOSED IT, IS THAT THEN YOUR TIME TO COME DOWN".

John Jordan "IF I GET FULL CONFIRMATION, IF THAT IS GONNA BE, I DON'T AGREE WITH YOUR (inaudible) IF I GET FULL CONFIRMATION THAT THE ROAD IS SHUT DOWN FOR TWELVE HOURS WHILST YOU DO A PROPER STRUCTURAL INTEGRITY TEST THEN YES I WILL COME DOWN". PC71784 Owen "GOT YA. OK".



22:13:25 PC71784 Owen turns off his BWV.

INTENTIONALLY BLANK

P.D. Walker PC1729 Paul Walker

Source: BWV – Arresting Officer.
BWV Clip Number: None (Clip 3 of 6)
Officer name (BWV): PC71784 Owen
Date Shown on footage: 28/08/2022
Start time Shown on Footage: 22:29:36
Is there a delay in audio starting? Yes
Duration of footage: 2 minutes 29 seconds
Duration of footage viewed from: Start
AXON BWV Reference (8 digits): X6040917N

Axon Platform start time: N/A Real time (if different GMT): N/A If yes how long? 3 Seconds

Duration of footage viewed to: Finish

Holmes Exhibit ref:

22:29:36

PC71784 Owen activated his BWV for the third time whilst on St Clements Way, West Thurrock, Grays, Essex where he was monitoring the actions of John Jordan one of the protesters from the 'Just Stop Oil' protester group that had obstructed the highway causing vehicles to stop and as a result John Jordan had climbed on to the top of a fuel tanker whilst another attempted to use a drill on one of the rear tyres of the vehicle.

Officer Exhibit Ref: None provided at time of review.



PC71784 Owen's GPS location map shows where this took place.

22:29:36 to 22:31:04 PC71784 Owen activates his BWV where John Jordan is in conversation with drivers that have been prevented from continuing their journeys due to his continued presence on the top of the fuel tanker and the actions of other protesters.

His comments are inaudible as the footage begins.

Driver in fluorescent yellow top "THEY HAVE EASED THE TRAFFIC GOING IN AND OUT OVER THE LAST COUPLE OF DAYS".

John Jordan "(inaudible) YOU'VE SEEN THEM BEFORE, THE MILITARY (inaudible)".

There is a short gap and then John Jordan says "I'VE JUST GOT OUT OF COURT (inaudible)" There is another short gap and then John Jordan says "(inaudible) THIS IS NOT GONNA LOOK WELL ON ME (inaudible)".



22:31:04

What is believed to be one of the depot fleet operators in an orange fluorescent vest on the opposite of the fuel tanker then says "YOU'RE SAYING ABOUT YOU'RE WORRIED ABOUT THE SAFETY OF YOUR COLLEAGUES, THEY'RE STILL DIGGING DOWN THERE. WHY ARE THEY STILL DIGGING IF YOU'RE WORRIED ABOUT THEM".

The conversation continues but is inaudible due to PC71784 Owen talking to another police officer and due to radio communications.



22:32:06 PC71784 Owen turns his BWV off.

INTENTIONALLY BLANK

P.D. Walker PC1729 Paul Walker

Source: BWV – Arresting Officer.
BWV Clip Number: None (Clip 4 of 6)
Officer name (BWV): PC71784 Owen
Date Shown on footage: 28/08/2022
Start time Shown on Footage: 22:33:45
Is there a delay in audio starting? Yes
Duration of footage: 9 minutes 17 seconds
Duration of footage viewed from: Start

AXON BWV Reference (8 digits): X6040917N

Officer Exhibit Ref: None provided at time of review.

Axon Platform start time: N/A Real time (if different GMT): N/A If yes how long? 59 Seconds

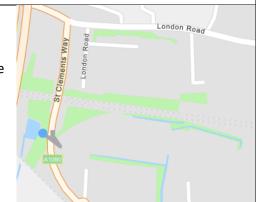
Duration of footage viewed to: Finish

Holmes Exhibit ref:

22:33:45

PC71784 Owen activated his BWV for the fourth time whilst on St Clements Way, West Thurrock, Grays, Essex where he was monitoring the actions of John Jordan one of the protesters from the 'Just Stop Oil' protester group that had obstructed the highway causing vehicles to stop and as a result John Jordan had climbed on to the top of a fuel tanker whilst another attempted to use a drill on one of the rear tyres of the vehicle.

PC71784 Owen's GPS location map shows where this took place.



22:35:45 to 22:37:45 PC71784 Owen activates his BWV where a number of drivers that had been prevented from continuing their journeys due to John Jordan's continued presence on the top of the fuel tanker were confronting him about his actions and the effects it was having on them and others. It was pointed out to him that he was affecting people who were just trying to earn a living. It was also pointed out to him that many of the businesses that his actions were affecting were not connected to the oil industry. He did not respond to these comments.



22:37:45 to One of the drivers asks "WHY DON'T YOU COME DOWN. PLEASE".

John Jordan "I WILL COME DOWN WHEN I'VE GOT CONFIRMATION (inaudible)".

22:39:59

Drivers point out that a lot of them have just finished 8 hours shifts and they just want to get home but John Jordan makes no response.

One of the drivers then says "WE ARE BEGGING YOU TO COME DOWN. PLEASE".

John Jordan makes no immediate response but after a short delay he say "I WANT TO GET DOWN. I DON'T PARTICULARLY ENJOY GETTING BERATED BELIEVE IT OR NOT".

22:40:32	One of the drivers says "EVERYBODY WANTS TO JUST FINISH THEIR JOB AND GO HOME".	
	John Jordan does not respond.	
22:40:43	PC71784 Owen has to explain to one driver why police are not appearing to do anything and discusses	
	the health and safety issues around removing someone from a height.	
22:42:29	PC71784 Owen moves around the area of the front of the fuel tanker and as he does his BWV captures	
to	the growing number of drivers that are confronting John Jordan about as he actions as they have been	
22:42:47	prevented from continuing their journeys. From what is being said some are on work journeys whilst	
	others are either trying to go into work or trying to get home after the end of their working day.	







22:43:29 PC71784 Owen turns off his BWV.

INTENTIONALLY BLANK

P.D. Walker PC1729 Paul Walker

Source: BWV – Arresting Officer. BWV Clip Number: None (Clip 5 of 6) Officer name (BWV): PC71784 Owen Date Shown on footage: 28/08/2022 Start time Shown on Footage: 23:19:11 Is there a delay in audio starting? Yes Duration of footage: 1 minute 36 seconds Duration of footage viewed from: Start

AXON BWV Reference (8 digits): X6040917N Officer Exhibit Ref: None provided at time of review.

Axon Platform start time: N/A Real time (if different GMT): N/A If yes how long? 59 Seconds

Duration of footage viewed to: Finish

Holmes Exhibit ref:

23:19:11

PC71784 Owen activated his BWV for the fifth time whilst on St Clements Way, West Thurrock, Grays, Essex where he was monitoring the actions of John Jordan one of the protesters from the 'Just Stop Oil' protester group that had obstructed the highway causing vehicles to stop and as a result John Jordan had climbed on to the top of a fuel tanker whilst another attempted to use a drill on one of the rear tyres of the vehicle.

PC71784 Owen's GPS location map shows where this took



23:19:11 to 23:20:48 PC71784 Owen activates his BWV where John Jordan is still in conversation with drivers that have been prevented from continuing their journeys due to his continued presence on the top of the fuel tanker and the actions of other protesters.

One of the drivers asks PC71784 Owen if whilst John Jordan is distracted in the conversation can he not just go up and drag him off of the fuel tanker.

PC71784 Owen explains that John Jordan is holding a tube of glue in his hand and that as soon as anyone goes near him he will just put the glue on his hands and stick himself to the roof of the tractor unit.



23:20:48

PC71784 Owen turns off his BWV.

INTENTIONALLY BLANK

P.D. Walker PC1729 Paul Walker

Source: BWV – Arresting Officer. BWV Clip Number: None (Clip 6 of 6) Officer name (BWV): PC71784 Owen Date Shown on footage: 29/08/2022 Start time Shown on Footage: 00:10:36 Is there a delay in audio starting? Yes

Duration of footage: 54 minutes 30 seconds
Duration of footage viewed from: Start
AXON BWV Reference (8 digits): X6040917N

Officer Exhibit Ref: None provided at time of review.

Axon Platform start time: N/A Real time (if different GMT): N/A If yes how long? 59 Seconds

Duration of footage viewed to: Finish

Holmes Exhibit ref:

## 00:10:36

PC71784 Owen activated his BWV for the sixth time whilst on St Clements Way, West Thurrock, Grays, Essex where he was monitoring the actions of John Jordan one of the protesters from the 'Just Stop Oil' protester group that had obstructed the highway causing vehicles to stop and as a result John Jordan had climbed on to the top of a fuel tanker whilst another attempted to use a drill on one of the rear tyres of the vehicle

His BWV remains on until a point during the custody suite booking in process at Grays Police Station.



### PC71784 Owen's GPS location map shows where this took place.

#### 00:10:36

When PC71784 Owen activated his BWV the Working at Heights, Protester Removal Team (PRT) were already on scene and in the process of preparing to remove John Jordan from the top of the vehicle. It appears that when they arrived he had glued himself to the top of the fuel tankers tractor unit and the process of unsticking him had just been completed when the BWV was activated.



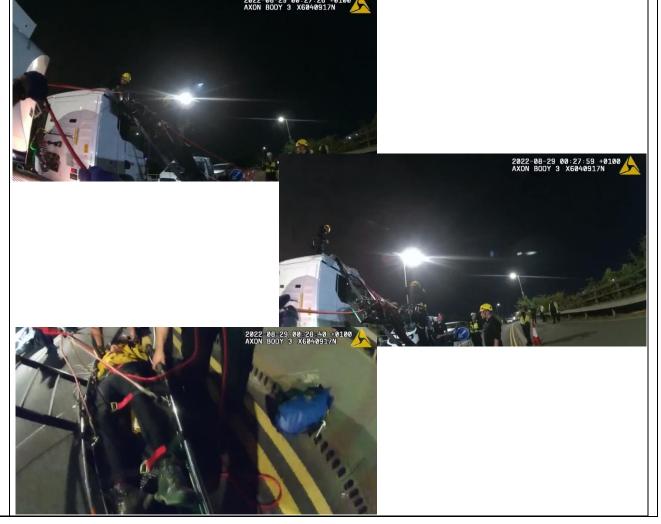
00:18:52 As the PRT officers prepare to place John Jordan on a stretcher to be able to lower him safely from the roof of the tractor unit they call him 'Shaun'. PC71784 Owen calls up and corrects them that his 'real

name is John'.



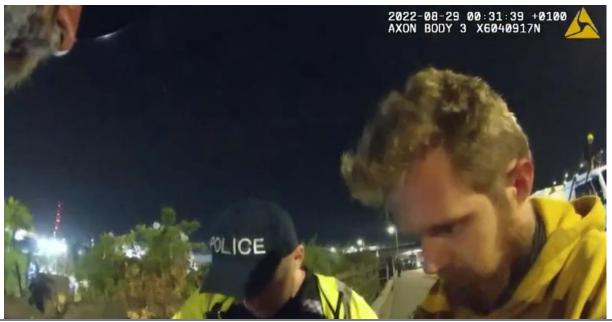
00:27:26 to 00:28:40

The PRT officers with the assistance of PC71784 Owen having placed and secured John Jordan onto a stretcher and having moved him to the edge of the roof of the tractor unit lower him to the ground.



00:30:19 One of the PRT officers asks "HAVE YOU GOT GLUE ON YOUR HANDS". John Jordan "YES". PC71784 Owen says "ALRIGHT JOHN, THE TIME IS TWELVE THIRTY P.M. OR A.M. I SHOULD SAY, YOU'RE 00:30:31 UNDER ARREST FOR TAMPERING WITH A MOTOR VEHICLE" and then administers the caution and asks 00:31:00 "IS THAT CLEAR". John Jordan "Delightful". PC71784 Owen then places John Jordan in handcuffs. PC71784 Owen "OK SHAUN WAIT THERE A MINUTE. I KEEP CALLING YOU SHAUN BUT YOUR NAME IS JOHN IN IT". John Jordan "UM, MY LEGAL NAME IS JOHN. I DON'T LIKE TO BE CALLED THAT". PC71784 Owen "YOU PREFER SHAUN, ALRIGHT, OK I'LL CALL YA SHAUN IF THAT'S WHAT YOU PREFER". 2022-08-29 00:30:28 +0100 AXON BODY 3 X6040917N 2022-08-29 00:30:31 +0100 AXON BODY 3 X6040917N

00:31:39 Having been released from the stretcher John Jordan walks along St Clements Way towards where a waiting marked police vehicle is parked.



00:32:11 Whilst PC71784 Owen is conducting a search of John Jordan he states that he is wearing a 'piss bag'.

Asked how it was attached he states "IT'S NOT ATTACHED. I WOULD HAVE USED IT TO PEE IN IF THERE HADN'T A BEEN SUCH A BIG CROWD BUT I GOT STAGE FRIGHT".



00:32:43 PC71784 Owen provides the necessity to arrest information to which John Jordan replies "I STILL HIGHLY RECOMMEND THAT YOU KEEP THE ROAD CLOSED AS THERE'S TUNNELS UNDERNEATH AND YOU'RE ENDANGERING THEIR LIVES".

PC71784 Owen says "NOTED".

John Jordan "THEY'RE STILL DIGGING".

PC71784 Owen "IT'S NOTED MATE BUT IT'S BEYOND MY CONTROL I HOP YOU APPRECIATE THAT". John Jordan "I DO BUT IT'S A DEATH ON YOUR HAND (inaudible)".

00:30:25 John Jordan is placed in the rear of a marked police vehicle.



O0:35:17 As PC71784 Owen drives along St Clements Way on his way to Grays Police Station he passes a number of vehicles that had been parked up since about 1930 hours due to being unable to use the road.



00:35:36 to 00:36:15 As PC71784 Owen drives along London Road on his way to Grays Police Station he passes a large number of heavy goods vehicles and private motor vehicles that are parked along the road and joining side streets, and which have been prevented from using St Clements Way. It takes him about 30 seconds to drive past all of these vehicles.







00:36:15 to 00:50:21 During the journey to Grays Police Station there is general conversation between PC71784 Owen and John Jordan. A lot of this is however inaudible due to road noise. John Jordan does make reference to 'injunctions' and a previous court appearance but it is only the odd word that can be made out. During the conversation John Jordan states that he originally comes from the Republic of Ireland. John Jordan arrives at Grays Police Station at around 00:50 hours.



00:52:00 to 00:56:17 John Jordan is seated in the holding area of Grays Police Stations Custody Suite where at 00:53:00 he says "I'VE STILL GOT GLUE ON MY HANDS".



00:56:17

John Jordan has been taken through to the custody suite and is placed before one of the detention officers carrying out the custody booking in process. However before the process is begun he is taken through to one of the cells so that he can use the toilet after he expresses a need to use the toilet. Whilst in the cell the previously mentioned 'piss bag' is removed.



00:59:20

John Jordan returns to the custody desk where the booking in process is commenced. During this process the offence for which he has been arrested along with the circumstances and reason for the arrest are provided to the detention officer.

Part of the circumstances that were provided were that having climbed on top of the fuel tanker he had refused to climb down until the road was closed for the safety of his friends in the tunnel. He then said "AND THE HEAVY GOOD VEHICLE DRIVERS AND THE POLICE".



01:02:38

In response to a question from the Custody Sergeant as to whether John Jordan had attached himself to the vehicle PC71784 Owen explained that when the PRT had arrived John Jordan had glued one of his hands to the roof of the vehicle.

O1:03:03 The Custody Sergeant asks John Jordan what his first name was, and he replies "UH, MY LEGAL NAME IS JOHN JORDAN BUT I PREFER TO BE CALLED SHAUN".

As the Custody Sergeant goes through the circumstances John Jordan says "I'M NOT DENYING HAVING DONE IT. I'VE DONE IT BECAUSE OF A TUNNEL UNDER THE ROAD".

The Custody Sergeant explains that this was not the time or place for him to make comment on the matter.

John Jordan says "I'M JUST MAKING YOU'SE FULLY AWARE THAT THE TUNNEL THAT IS UNDER THAT ROAD". What he says then becomes inaudible as PC71784 Owen moves away from the custody desk to talk with another police officer.

The BWV does then pick up John Jordan saying "USUALLY I WOULD SAY NO COMMENT AND WAIT FOR



MY DAY IN COURT BUT PEOPLE WILL DIE (inaudible)".

PC71748 Owen then leaves the custody area.

01:05:07 PC71794 Owen turns off his BWV.

Police were already present on St Clements Way, West Thurrock, Grays, Essex when four protesters from the 'Just Stop Oil' campaign took action that caused an obstruction of the highway by dropping the bicycles they were riding on the road and thereby obstructing the passage of traffic. One protester climbed up onto the cab of a fuel tanker, this being John Jordan, whilst another attempted to use a drill to puncture one of the fuel tankers rear tyres.

The protesters action has commenced at about 1930 hours on 28/08/2022 and the final protester, who was John Jordan was removed at about 0030 hours on 29/08/2022 after having glued himself to the roof of the tractor unit. The road had therefore been obstructed and closed to vehicular traffic for about 5 hours, although the closure continued for a short while after removal of the last protester whilst the specialist police officers that had to be brought in to remove John Jordan cleared their equipment away.

St Clements Way forms part of a 'horseshoe' along with Stoneness Road that gives access to an industrial

estate which amongst other businesses contains a fuel storage facility. These two roads are the only way in and out of the industrial estate. Due to protester action that had started a few days earlier, and was still ongoing at the time of this incident, Stoneness Road was closed to all vehicular traffic making St Clements Way the only way in and out of the industrial estate. During this incident not only were the drivers of fuel tankers prevented from going about their business but other members of the public were prevented from travelling into work or travelling home from work during the period of the road closure.

The image here is an image of John Jordan obtained during the custody procedure where he was allocated the custody reference number 42BZ/2538/22.



For disclosure I have considered whether there is any material which might reasonably be considered capable of undermining the case for the prosecution against the accused, or of assisting the case for the accused. Any material required to be supplied under paragraph 7.3 of the code.

Supply Details: None

Signature of reviewing officer:

P.D. Walker PC1729 Paul Walker

Time/Date of completion: 1320 hours on Monday 17<sup>th</sup> October 2022

#### **Check List: (tick when complete)**

- 1. Update the DS of your completion.
- 2. Notify OIC/Disclosure officer of anything evidential or meeting disclosure test
- 3. Has officer provided a statement producing footage?
- 4. Has BWV Officer Exhibited BWV correctly:
- 5. Has BWV Officer Exhibiting BWV saved footage correctly?
- 6. Ensure footage burnt to disc
- 7. Ensure exhibit is on HOLMES
- 8. Place review document into MIR Submitted for Holmes folder for registration.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

#### (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)
- (226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

# FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

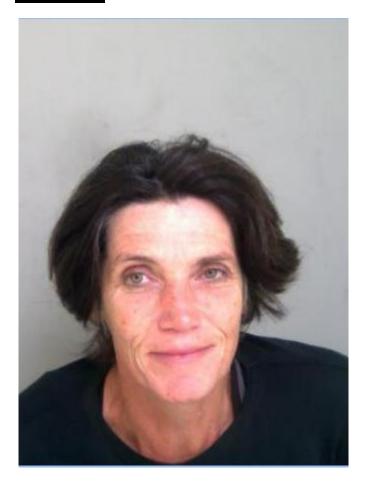
(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/98"	

### Karan Wildin 03/04/1964

Address - I

Contact Details -



42/MR/17900/22 Causing a danger to road users, having an article with intent to destroy / damage property, Conspire to destroy / damage property, wilful obstruction of the highway.

Circumstances of this investigation are WILDIN has been detained by Police at 19:41 hours on the 28th August 2022 at Oliver St Clements Way, Grays, Essex. WILDIN has arrived at St Clements Way at approximately 19:30 hours on the 28th Augst in company with other Just Stop Oil Direct action protesters. WILDIN and another Protester were riding peddle cycles, WILDIN and the other cyclist stopped in front of a fuel tanker causing it to stop. Once stopped the fuel tanker other members of the group WILDIN arrived with attacked the vehicle causing disruption to this area for approximately 35 hours. As Police were already on scene dealing with another protest from JSO WILDING was arrested and removed from the road within a quarter of an hour.

Arresting officer Pc 78431 Dodd, Arrest MG11 Attached.

Evidential Media Form completed by Pc 1729 Walker, Exhibit PDW/17 attached.

Police Case material report to CPS MG5 has been attached detailing the particulars of the criminal case.

Result – Causing a danger to road users, having an article with intent to destroy / damage property, Conspire to destroy / damage property - No Further Action. Wilful obstruction of the highway discontinued at court.

Custody Record 42BZ/2546/22 conspiracy to cause a public nuisance.

Circumstances of this investigation are WILDIN has been detained by Police at 04:55 hours on the 30th August 2022 at Stoneness Road, Grays, Essex. On the 30th August 2022 Police officers were on scene guard of a Just stop Oil protester occupied tunnel which was located on Stoneness Road. While on this scene WILDIN was stopped and detained 2 meters from the entrance to the protester tunnel. WILDIN was found in possession of supplies that would have allowed the occupants of the tunnel to sustain their occupation for longer. WILDIN had been released from custody approximately 7 hours prior to this further arrest, she had been arrested in the same area also for JSO protest related activity.

Arresting officer Pc 81085 Bredin MG11 Attached.

Result – No Further Action

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

#### (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)
- (226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

# FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/99"	

#### **OFFICIAL**

MG11 (Interactive)

Page 1 of 3

WITNESS STATEMENT		
Criminal Procedure Rules, r. 16.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B		
URN		
Statement of: Jack DODD		
Age if under 18: OVER 18 (if over 18 insert 'over 18') Occupation: Police Constable 78431		
This statement (consisting of 3 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.		
Signature: (witness) Date: 28/08/2022		

On SUNDAY the 28th of AUGUST 2022 I was on duty in full Police uniform. I am attached to the call-sign NN359 but was then allocated the call-sign HAZEL 12. I was in company with APS 77883 GUNSHON and PC 81860 NICHOLLS.

I was attached to OP HAZEL and was on a scene guard on ST CLEMENTS WAY in GRAYS. This was a tunnel that was occupied by two people. The tunnel was approximately 5 metres away from the road, the other side of a crash barrier. The side of the road nearest to the tunnel had been closed, leaving a single carriageway with traffic been controlled by a set of temporary traffic lights. There was also a marked Police unit at the end of the road stopping vehicles to make sure that only those with a genuine purpose used the road.

I had been involved in the operation a number of times earlier in the year and was therefore aware of the background of the situation and the behaviours of those involved.

Sometime after 1930 hours a large lorry with a fuel container, traveling from left to right as I looked at the road, stopped and was shouting to get our attention. The driver was shouting something to the effect of: "THERE ARE PEOPLE COMING ON BIKES, THEY'RE DEFINATELY PROTESTERS." I then saw two females, both on bikes approaching the lorry from the front. They left their bikes in the road and started running towards the lorry. The lorry tried to reverse away. One of the females was shouting "STOP."

Signature: The Cold	Signature witnessed by:	
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<b>OFFI</b>	C	ΙΑ	L
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MG11 (Interactive)

Page 2 of 3

APS GUNSHON AND PC NICHOLLS jumped over the barrier and ran towards the females. I hesitated by the scene as I was aware that we were leaving it unmanned. I remained by the barrier, so I had view of the tunnel. PC NICHOLLS took hold of the lady who was shouting "STOP" at the carriage. I would describe her as a white female, appearing to me to be in her mid-50's, she was approximately 5'10 tall, of slim to medium build. She had short dark hair that had some sort of bandana holding it back and was wearing black shorts and a light-coloured top. She had a light blue rucksack. She did not give her details whilst on scene, but I now know this to be Karen WILDIN.

PC NICHOLS walked in my direction holding WILDIN. As they approached, I told her that I was detaining her under Section 1 of PACE to search her for items used to caused Criminal Damage. I suspected that she may have these items given her behaviour, the location, the fact she had a rucksack on, and my knowledge and experience having been involved in the operation numerous times previously. I took control of WILDIN and explained the necessary information in order to detain her for the search. PC NICHOLLS searched her rucksack. Inside he told me was a large 'JUST STOP OIL' poster. This information was relayed to the talk group. Given the clothing that she was wearing I looked to see if I could see any signs of anything being on her person but did not physically search her.

Given WILDIN'S behaviour 1941 hours I placed her under arrest. I said: "YOU ARE CURRENTLY UNDER ARREST ON SUSPICION OF CAUSING DANGER TO ROAD USERS" and said the section of the Road Traffic Act, Section 22A. I then cautioned WILDIN. As I was cautioning WILDIN she was protesting stating that it was us that were endangering the public, by not allowing her to protest. I explained her arrest was necessary to prevent harm and to prevent her disappearance. It was also necessary to ensure a prompt and effective investigation by means of interview.

I waited with WILDIN and later was taken to a Police carrier and conveyed WILDIN to GRAYS CUSTODY.

At custody I was present as PC 81307 DEVINE searched WILDIN and her bag. In the rucksack WILDIN found a small tube of what I believe to be super glue. It was marked "ULTRA GLUE". Given my experience and knowledge of the operation I suspected that WILDIN had this in her

Signature TY 3	/Signature witnessed by	,
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#### **OFFICIAL**

MG11 (Interactive)

Page 3 of 3

possession to glue herself or other objects to the tanker that she had been running at. Given this, at 2240 hours I further arrested WILDIN, stating words to the effect of: "I AM FURTHER ARRESTING YOU ON SUSPICION OF GOING EQUIPED WITH ITEMS TO CAUSE CRIMINAL DAMAGE." I then repeated the caution and stated that her arrest was necessary so that she could be interviewed and to prevent any damage.

At the custody desk PC DEVINE asked WILDIN if she would be willing to give us the password to her mobile phone. She said no. I then noticed that I did not have my Body Worn active at this time and turned it back on, repeating the question, to which WILIDN stated: "NO COMMENT." I understood this as a refusal. My Body Worn video was active during the initial incident.

JD/01 - 'JUST STOP OIL' banner.

JD/02 - Orange rope with spots.

JD/03 - Photograph of 'JUST STOP OIL' banner.

JD/04 - Tube of 'ULTRA GLUE'.

JD/05 - Samsung phone in clear case, in black pouch.

JD/06 - BWV PC DODD.

JD/07 - BWV PC DODD, password request.

These are my original notes made at GRAYS POLICE STATION at 0040 hours on MONDAY the 29<sup>th</sup> of AUGUST 2022.

Signature: 5140000

Signature witnessed by:

2010/11

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/100"	

### Evidential Media Form - PDW/17

Reviewing Officer Name: PC1729 Paul Walker

Review date: Friday 7<sup>th</sup> October 2022 and Monday 10<sup>th</sup> October 2022 to Wednesday 12<sup>th</sup> October 2022

Review time start: 1410 hours on Friday 7<sup>th</sup> October 2022

Review time finish: 0900 hours on Wednesday 12<sup>th</sup> October 2022

This form has been generated from the viewing of officers Body Worn Video.

This form has been generated to show the scene at St Clements Way, West Thurrock, Essex and the actions of the Just Stop Oil protesters involved.

To show continuity at the beginning of every media source used you will see the below – this is to ensure you as the reader can understand what the media is, who it is from, the date and duration. This will then show how the timeline has been formed and via what media source.

Source: BWV / Evidence gatherer footage / Custody image.

**BWV Clip Number:** 

Officer name (BWV/Evidence gatherer user):

Date Shown on footage: Axon Platform start time: Start time Shown on Footage: Real time (if different GMT):

Is there a delay in audio starting? Y/N

Duration of footage:

If yes how long?

Holmes Exhibit ref:

Duration of footage viewed from: Duration of footage viewed to:

AXON BWV Reference (8 digits):

Officer Exhibit Ref:

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P.D. Walker PC1729 Paul Walker

Summary (Must have sufficient details to satisfy a review under provisions of CPIA) Consider screen captures and direct speech and include counter times.

Screen Display Time (NOT counter time)	Summary  Highlight any information requiring redacting/editing	
	Source: BWV – Arresting Officer BWV Clip Number: None Officer name (BWV): PC 78431 Dodd Date Shown on footage: 28/08/2022 Axon Platform start time: N/A Start time Shown on Footage: 19:36:16 Real time (if different GMT): N/A Is there a delay in audio starting? Yes If yes how long? 59 Seconds Duration of footage: 2 hours 41 minutes 19 seconds Duration of footage viewed from: Start Duration of footage viewed to: Finish AXON BWV Reference (8 digits): X60415137 Holmes Exhibit ref: Officer Exhibit Ref: JD/06	
19:36:16	PC78431 Dodd activated his BWV whilst on St Clements Way, West Thurrock, Grays, Essex where protesters from the 'Just Stop Oil' protester group had obstructed the highway causing vehicles to stop and as a result one protester had climbed on to the top of a fuel tanker.  PC78431 Dodd was already on St Clements Way on a scene guard for a tunnel that had been dug by protesters over the preceding days.  PC78431 Dodd's GPS location map shows where this took place.	
19:36:16	Caren Wildin had already been detained by PC81860 Nicholls when PC78431 Dodd activated his BWV. PC81860 Nicholls is seen walking her back from where a fuel tanker had been forced to stop due to her and other protesters actions. (PC81860 Nicholls has no BWV of his involvement in this incident). The fuel tanker can just be seen in the middle far left of this image as indicated by the arrow.	

19:36:27

This image shows two fuel tankers whose drivers had been prevented from going about their business due to the actions of the protesters on St Clements Way. A short while after this image was captured a protester climbed up onto the cab of the front fuel tanker. Fuel tankers indicated by the arrows.



19:36:40

In this image it can just be seen that there is a protester on top of the cab of the first fuel tanker that had been forced to stop by the protester's actions. He is indicated by the arrow. (The area in the bottom left of the image is the location of the tunnel that PC78431 Dodd and other officers had been guarding when this incident occurred).



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P.D. Walker PC1729 Paul Walker

19:37:16 PC78431 Dodd informs Caren Wildin that a search is going to be conducted under Section 1 of PACE and but the sound on the BWV only activates part way through this.

PC78431 Dodd "... UNDER SECTION 1 OF PACE FOR ITEMS (inaudible) CRIMINAL DAMAGE" and he then identifies himself and his station and goes on to say "THE REASON I'M SEARCHING YOU IS COZ I BELIEVE YOU MIGHT HAVE ITEMS ON YOU THAT WILL CAUSE CRIMINAL DAMAGE". He then informs her that she can get a copy of the search record within 3 months. Carin Wildin then asks him for his name and he again provides his name and warrant number.

Caren Wildin then asks "WHAT'S YOUR VIEW ON THE CLIMATE EMERGENCY".

PC78431 Dodd responds by saying "PARDON".

Caren Wildin then again asks "WHAT'S YOUR VIEW ON THE CLIMATE EMERGENCY.

PC78431 Dodd replies by saying "I'M NOT GOING TO DISCUSS (*inaudible*)". PC78431 Dodd's full response is inaudible due to Caren Wildin overtalking him and she goes on to make a general statement about climate control.



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P.D. Walker PC1729 Paul Walker

19:38:20 PC78431 Dodd asks Carin Wildin "ARE YOU ALRIGHT. I CAN FEEL YOU'RE GOING LIKE THE CLAPPERS.

to YOU ALRIGHT YER".

19:38:36 | Caren Wildin "AM I".

PC78431 Dodd "YER".

Caren Wildin "IT'S A BIT SCARY (pointing towards the stationary fuel tanker) (inaudible)".

PC78431 Dodd "I MEAN, I'LL BE HONEST WITH YER. WHEN YOU'RE STANDING IN FRONT OF LIKE GOD KNOWS WHAT TONNE LORRIES IT'S GONNA BE SCARY IN'IT".

Caren Wildin "IT'S A BIT SCARY YER".

During this interaction PC81860 Nicholls is searching the rucksack that Caren Wildin had been carrying.



19:38:55 PC81860 Nicholls removes a 'Just Stop Oil' banner from the rucksack of Caren Wildin to which she says "CAN I HOLD IT PLEASE WITH PRIDE".

PC78431 Dodd "THERE'S NO ONE AROUND TO SEE IT IS THERE"

Caren Wildin "ALL THE MEDIA WILL BE COMING SOON".

She is not given the banner.



19:39:12 Caren Wildin looks over the fence to where the undergrowth has been cleared around the entrance to the tunnel at the side of the road and she says "SO WHAT'S HAPPENING HERE THEN".

19:39:30 PC78431 Dodd "I THINK YOU PROBABLY KNOW. YOU KNOW WHAT'S HAPPENING HERE DON'T YOU".

Caren Wildin " WHAT'S ALL THAT RUBBISH THEN".

PC78431 Dodd "NIGHTMARE AIN'T IT".

Caren Wildin then shouts out "SENDING LOVE".

There is a voice from off camera and most likely from inside the tunnel but the words are inaudible to which Caren Wildin responds by again shouting "SENDING LOVE" followed by "HEY BEAUTIFUL



PEOPLE".

19:39:49 PC81860 Nicholls informs PC78431 Dodd that there is a rope in the rucksack belonging to Caren Wildin but he does not remove it.

19:39:56 Caren Wildin asks "AM I GOOD TO GO".

PC78431 Dodd " NO".

Caren Wildin "WHY".

PC78431 Dodd "I'LL LET YOU KNOW IN A SEC".

19:40:10 During a radio communication PC78431 Dodd states that he has someone detained who had run out infront of a tanker.

Caren Wildin makes further general comments about the climate emergency and makes statements in relation to the climate crisis.

During the continuing radio communications PC78431 Dodd states that the person he has detained had ditched her pedal cycle in the road and then ran at one of the fuel tankers in the road.

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P.D. Walher PC1729 Paul Walker

19:41:11 PC78431 Dodd says "JUST LISTEN TO WHAT I'M SAYING MATE. UM, YOUR CURRENTLY UNDER ARREST".

TO Carin Wildin "OK".

19:42:10 PC78431 Dodd "ON SUSPICION OF CAUSING DANGER TO ROAD USERS".

Caren Wildin "OK".

PC78431 Dodd "UNDER SECTION TWENTY TWO ALPHA".

Caren Wildin then overtalks PC78431 Dodd as he administers the caution and provides the reasons for the arrest.

The comments that Caren Wilding makes are "OK AND ARE YOU UNDER, OK HOLD ON, BUT YOU GUYS ARE IN DANGER, YOU'RE CAUSING DANGER BY LETTING THE CLIMATE EMERGENCY, YOU GUYS ARE IN, YOU GUYS. NO, NO YOU GUYS ARE ENDANGERING THE PUBLIC BY NOT ALLOWING PROTESTS AGAINST CLIMATE EMERGENCY. RIGHT. ALL OF YOU GUYS WHO ARE STOPPING US PROTESTING, YOU'RE A DANGER TO THE PUBLIC. YOU GUYS ARE ENDANGERING THE PUBLIC BUT NOT LETTING PEACEFUL PROTESTERS, OK, GET THE WORD OUT AND MAKING DEMANDS OF THE GOVERNMENT. IT'S NOT US WHO'S ENDANGERING THE PUBLIC. IT'S EVERYONE, IT'S EVERYONE WHOSE STOPPING PROTEST. EVERYONE. EVERYONE WHOSE STOPPING PROTEST IS ENDANGERING THE PUBLIC COS YOU'RE NOT LETTING US GET THE WORD OUT AND PUT THE PRESSURE ON GOVERNMENT".



19:43:18 Caren Wildin shouts out "WELL DONE SHAUN" whilst looking back towards the fuel tanker where another protester has climbed up onto the top of the cab of the vehicle. At the same time she waves a couple of times.

She then starts singing a song that includes the words 'climate emergency'.



19:50:26 Caren Wildin is seated in the rear of a marked police vehicle.



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P. D. Walker PC1729 Paul Walker

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19:50:44	PC78431 Dodd makes a radio transmission during which he states that there is now only one officer covering the entrance to the tunnel on St Clements Way.  Caren Wildin responds by standing up out of the marked police vehicle and shouting out "YOU'VE ONLY
	GOT ONE OFFICER MANNING THE HOLE". She then goes on to make various statements about the climate crisis and the HS2 project.
	2022-03-23 19:50:47 40100 AXON BODY 3 X60415137
10.50.00	DC70424 Parklet sky Cover Wildin for hear age as that he cover he says he details and the dealines
19:59:00	PC78431 Dodd asks Caren Wildin for her name so that he can record the search details and she declines to do so by saying nothing. PC78431 Dodd then asks her if she is going to want a copy of the search record and she responds by shaking her indicating 'No'.
19:59:08	Caren Wildin asks "SO WHY ARE YOU DETAINING ME NOW".
	PC78431 Dodd "BECAUSE YOU'VE BEEN ARRESTED".
	Caren Wildin "FOR WHAT".
	PC78431 Dodd "FOR CAUSING DANGER TO ROAD USERS BECAUSE YOU RAN AT A VERY LARGE".  Caren Wildin interrupts "NO I DIDN'T. I WAS CYCLING. I JUST GOT OFF MY BIKE".
	PC78431 Dodd "DID YER".
	Caren Wildin "YER. I JUST GOT OFF MY BIKE. I DIDN'T RUN AT ANYTHING".
	PC78431 Dodd "YOU'LL BE ABLE TO SORT THAT OUT IN CUSTODY, ALRIGHT" and he then points out that
	the arrest is 'on suspicion'.
20:02:10	Some representatives of the local private security linked to the fuel depot had arrived on scene and
20.02.02	Caren Wildin makes allegations that the police and the private security are working together.
20:03:03	Caren Wildin notices some shovels on the pavement and then makes claims that police steal their kit and don't give it back.
20:04:27	Caren Wildin shouts out "WELL DONE SHAUN" and repeats "WELL DONE SHAUN" and then makes
	further climate crisis statements.

	T
20:10:23	Caren Wildin leans forward out of the seat in the marked police vehicle and shouts out "WE'RE ABOUT TWENTY FIVE METRES FROM THE HOLE GUYS". After a short gap she continues "ABOUT TWENTY FIVE METRES BEFORE THE BRIDGE, TWENTY FIVE METRES BEFORE THE BRIDGE".
	AXON BODY 8 XEO49L5187
20:11:20	Caren Wildin asks PC78431 Dodd personal questions about his home life. Whilst in general conversation she states that she teaches English literature and language up to GCSE level but now does self-employed tutoring.
20:17:05	Caren Wildin again asks what she has been arrested for and is again told 'causing a danger to road users'. She asks to get a drink of water from her rucksack, but it is explained that as we do not know what is in the bottle this cannot be allowed.
20:25:15	During another series of general political and environmental statements Caren Wildin states "SO OCTOBER THE FIRST. ON OCTOBER THE FIRST WE'RE GOING TO BE BLOCKING WESTMINSTER. YOU KNOW HOW I THINK YOU SAID THERE ARE WAYS OF DOING THIS, OK, AND THE REASON WE DO DIRECT ACTION IS BECAUSE ALL THE WRITING OF EMAILS AND ALL THE STANDING OUTSIDE PARLIAMENT PROTESTING, ALL THE DEMONSTRATIONS THAT YOU DO HAVEN'T MADE ANY DIFFERENCE, BUT BECAUSE PEOPLE ARE ALWAYS ASKING WE ARE GOING BACK DOWN TO PARLIAMENT AND WE'RE GOING TO ASK PARLIAMENT AGAIN TO START TAKING RADICAL ACTION". She then continues to make further general political and environmental statements.

20:43:04 PC81307 Devine arrives to conduct the body search of Caren Wildin. (She has no BWV of this search).



20:46:43 Caren Wildin stands out of the marked police vehicle and shouts out "LOVE YOU AMIGOS" followed by "SENDING YOU LOVE AMIGOS".



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P. D. Walker PC1729 Paul Walker

20:49:22

Caren Wildin again gets up out of her seat within the marked police vehicle and then shouts out "JUST STOP OIL. JUST STOP OIL. WE'RE IN A CLIMATE EMERGENCY WE NEED TO DE-GROW THE ECONOMY. TRANSITION TO A GREEN WAY OF LIVING".

A male voice responds but is inaudible.

Caren Wildin then replies shouting "WE NEED TO ALL WORK ON THIS TOGETHER. YER LET'S GET RID OF THE CRAP POLITICIANS. LET'S MAKE IT HAPPEN TOGETHER. THEY'RE ALL IN IT TOGETHER".

The only persons that were around at this time were police officers, security staff from the nearby oil depot and the drivers of fuel tankers and private vehicles that had been prevented from continuing their journeys due to the actions of the protesters.



20:50:21 to 20:50:47 Carin Wildin again gets up out of her seat within the marked police vehicle and then shouts out "WE'VE GOT TILL SEPTEMBER TWENTY FOUR TO TURN ROUND GUYS. JOIN JUST STOP OIL. COME JOIN THE DEMONSTRATION OCTOBER FIRST".

It appears that these comments are directed at a group of the inconvenienced drivers and security staff a short distance away. (Circled in the image). She continues shouting "LOOK ON THE WEBSITE. CHOSE ANYTHING. DO SOMETHING FOR YOUR YOUNG PEOPLE. OK. WE ALL HAVE TO DO SOMETHING. WE ALL WANT TO JUST STOP OIL AND FIND AN ALTERNATIVE WAY OF DOING THINGS".



20:54:12	Caren Wildin shouts out "KEEP GOING AMIGOS".		
20:55:10	PC78341 Dodd carries out a welfare check by asking Caren Wildin if there is any medication or needs she		
	has for when she is in custody but she states that there are none.		
20:58:37	Caren Wildin shouts out "KEEP GOING GUYS. LOVE YOU AMIGOS".		
21:06:40	Caren Wildin says "THERE'S A TUNNEL UNDER THE ROAD. THERE SHOULDN'T BE PEOPLE DRIVING ON		
то	THIS ROAD YOU KNOW (inaudible)".		
21:09:23	PC78341 Dodd was on his radio when this comment was made and he says "SORRY WHAT WAS THAT		
	MATE".		
	Caren Wildin "I WAS SAYING IF THERE'S A TUNNEL UNDER THIS ROAD NO ONE SHOULD BE DRIVING ON		
	IT. IT'S A DANGER FOR EVERYBODY UNDER AND OVER. SO THAT'S A REALLY IMPORTANT MESSAGE THAT		
	YOU GUYS NEED TO GET OUT. NO, UM, PLEASE DON'T DRIVE OVER THIS ROAD.		
	PC78341 Dodd "DO YOU KNOW HOW FAR IT GOES UNDER".		
	Caren Wildin "ALL I KNOW IS THAT IF YOU'VE GOT A TUNNEL UNDER A ROAD LIKE THIS, OK, ITS		
	OBVIOUS THAT NO ONE SHOULD BE TAKING THE RISK THAT THAT ROAD IS GOING TO COLLAPSE. RIGHT,		
	SO I DON'T KNOW WHY PEOPLE ARE TAKING THE RISK BY RUNNING BLOODY CARS OVER. WHY DO YOU		
	THINK WE STOPPED THIS. OK, ITS UTTERLY IRRESPONSIBLE, UTTERLY IRRESPONSIBLE TO HAVE THIS		
	ROAD OPEN WHEN THERE'S A BLINKING TUNNEL UNDER IT. WHY ARE PEOPLE KEEPING IT OPEN. YOU		
	KNOW, YOU KNOW. I MEAN THERE'S OUR FRIENDS UNDERNEATH. ANYONE ON THE TOP IF THIS ROAD		
	SUBSIDES, RIGHT, SO EVERYBODY MUST KNOW IN THE PUBLIC AUTHORITIES, IN GOVERNMENT RIGHT,		
	THAT THEY'RE TAKING MASSIVE RISKS WITH LIVES. WHY WOULD ANYBODY DO THAT. ABSOLUTELY		
	OUTRAGEOUS. THIS ROAD SHOULD BE SHUT. CAN YOU PASS THAT MESSAGE ON PLEASE. CAN YOU		
	PLEASE PASS THAT MESSAGE ON. YOU KNOW, YOU POLICE OFFICERS, YOU KNOW. I'M REPORTING A CRIME HERE THAT THIS IS LIKE ROAD IS BEING USED WHEN THERE IS A TUNNEL UNDER IT. I'M		
	REPORTING A CRIME THAT NO ONE IS PROTECTING THE PEOPLE GOING OVER IT AND THE PEOPLE		
	UNDERNEATH IT BY KEEPING THE ROAD OPEN. ARE YOU GOING TO PASS THAT MESSAGE ON".		
	PC78431 Dodd "I THINK ITS ALREADY BEEN RESPONDED TO BY THE CHIEF OFFICERS".		
	Caren Wildin "WHAT ALREADY. ARE THEY, OK ARE THEY GONNA CLOSE THE ROAD.		
	PC78431 Dodd "NO I MEAN I THINK WE'VE ALREADY MADE A STATEMENT ABOUT THAT".		
	Caren Wildin "WHAT TONIGHT OR BEFORE THEN".		
	PC78431 Dodd "BEFORE".		
	Caren Wildin "BEFORE, OK, SO WHY WAS THE ROAD, YOU KNOW THERE WAS, WHEN I ARRIVED THERE		
	WAS STILL TRANSPORT COMING OVER THIS ROAD. ALRIGHT WHY DO YOU THINK WE ARE EAGER TO		
	STOP THESE BIG HEAVY TANKERS COMING OVER. OK BECAUSE PEOPLE IN POSITIONS OF		
	RESPONSIBILITY, WHETHER THAT BE POLICE OR THE LOCAL AUTHORITY. I DON'T KNOW WHO TAKES		
	RESPONSIBILITY FOR THIS RIGHT, BUT NO ONE'S DOING THE RESPONSIBLE THING AND SHUTTING THIS		
	ROAD, WHY ISN'T THAT HAPPENING".		
21:09:23	PC78431 Dodd "I'M GONNA REMIND YOU MATE. I KNOW YOU MIGHT NOT CARE BUT YOU ARE STILL		
	UNDER CAUTION RIGHT".		
	Caren Wildin "LISTEN, I'M PROUD, I'M PROUD, I'M, THAT'S FINE".		
	PC78431 Dodd "ANYTHING, I'M JUST GONNA REMIND YOU FOR YOUR SAKE THAT ANTHINGYOU DO SAY		
	CAN BE (inaudible as Caren Wildin overtalks PC78314 Dodd) REPORTED IN COURT".		
	Caren Wildin "I WANT YOU GUYS TO REPORT BACK FROM ME PLEASE SHUT THIS ROAD BEFORE THERE'S		
	AN ACCIDENT. RIGHT. WHY ONCE YOU KNEW THE TUNNEL WAS UNDER THERE HAS THIS ROAD STAYED		
	OPEN. WHAT IS GOING ON. SHOULDN'T BE US THAT'S HAVING TO STOP THE ROAD TO PROTECT PEOPLES LIVES. YOU'RE SUPPOSED TO PROTECT PEOPLES LIVES. POLICE OFFICERS ARE SUPPOSED TO		
	PROTECT PEOPLES LIVES.		
21:09:58	Caren Wildin "WHY IS THIS GOING ON. FLIPPING ECK".		
21:13:39	Caren Wildin "IF YOU GUYS HAD SHUT THIS ROAD WE WOULDN'T HAE HAD TO BE DOING THIS. RIGHT.		
to	THIS TUNNEL WAS FLIPPING. YOU GUYS KNEW ABOUT THIS TUNNEL HOWEVER MANY DAYS AGO RIGHT,		
21:16:15	AND YOU'VE DONE NOTHING TO PROTECT THE PEOPLE ON THIS ROAD. YOU SHUT THAT ONE, WHY		
21.10.13	HAVEN'T YOU SHUT THIS ONE. IT DOESN'T MAKE SENSE. SO YOU KNOW, WE'VE HAD TO TAKE ACTION		
	17. VERV 1. 100 SHOT THIS CIVE. IT BOLISH TWIANE SENSE, SO TOO KNOW, WE VEHIAD TO TAKE ACTION		

WHERE YOU GUYS HAVEN'T TAKEN RESPONSIBILITY. NOT YOU PERSONALLY BUT AS AN AUTHORITY YOU'RE SUPPOSED TO PROTECT PEOPLE. I KNOW YOU DO LOTS OF OTHER THINGS AS WELL. ITS NOT JUST YOU. I DON'T KNOW WHO ELSE IS RESPONSIBLE FOR ROAD SAFETY RIGHT BUT. CLIMATE EMERGENCY, GOT ROAD ISSUES AND YOU GUYS KEEPING THE ROADS OPEN. WHY ARE YOU DRIVING ON THE ROAD YOU CRAZY PEOPLE. WOULD YOU GO AND TELL YOUR OFFICER PLEASE. WOULD YOU JUST GO AND SAY THAT THIS PERSON IN THE BACK OF THE CAR IS REALLY, REALLY CONCERNED". PC78431 Dodd "HE'S BEEN HERE ALL DAY I'M SURE NE'S WELL AWARE". Caren Wildin "WELL YOUR BEING VERY COMPLACENT, RIGHT, WHY ARE YOU DRIVING ON THESE ROADS. YOUR NOT DOING IT ON THE OTHER ROAD OVER THERE". There is a shot gap and then Caren Wildin says "NUTS" and there is then another short gap. Caren Wildin "OK, WHAT'S YOUR NAME, HAZEL, I SHALL. IF THERE'S A TRAGEDY RIGHT, IF THERE'S A TRAGEDY I WILL SAY THAT I INFORMED YOU, RIGHT. THAT WHERE A TUNNELS GONE UNDERNEATH, RIGHT, IT POSSESS A RISK TO PEOPLE BOTH UNDERNEATH AND ABOVE IF THE ROAD IS STILL USED. OK. I'M REPORTING THAT TO YOU AND ASKING YOU TO GO AND SPEAK TO YOUR SENIORS. RIGHT, PEOPLE ARE CAVALIERLY DRIVING ACROSS. THERE'S A TUNNEL I DON'T KNOW WHERE IT GOES BUT ITS OBVIOUSLY A GREAT RISK OR MAYBE ITS NOT UNDER THE ROAD. IS THAT WHY YOU'RE SAYING THE ROAD SHOULD CARRY ON. WELL WE'VE HEARD ITS UNDER THE ROAD THAT'S WHY WE'RE HERE BLOODY STOPPING THE TRAFFIC. BUT YOU'RE NOT. WHAT'S YOUR NUMBER PLEASE". PC78431 Dodd "78431". Caren Wildin "7". PC78431 Dodd "78431. IT'LL BE ON YOUR ARREST PAPERWORK ANYWAY". Caren Wildin "BUT I JUST WANNA SAY. I'M ASKING YOU TO GO AND TELL YOUR OFFICERS TO STOP LETTING VEHICLES DRIVE OVER THIS ROAD PLEASE. WILL YOU JUST PASS THAT MESSAGE ON OK. WHAT CAN MEMBERS OF THE PUBLIC DO WHEN YOU'RE ASKING PEOPLE". PC78431 Dodd "I UNDERSTAND BUT THEY'RE VERY WELL AWARE OF IT AREN'T THEY". Caren Wildin "WELL WHY ARE THEY KEEPING DRIVING ALL OVER". PC78431 Dodd "ITS NOT MY DECISION". Caren Wildin "OK. VERY CAVALIER". Caren Wildin "VERY IRRESPONSIBLE. YOU KNOW PEOPLE MIGHT SAY WELL YOU GUYS ARE 21:16:34 RESPONSIBLE, WHY ARE YOU MAKING THE ROAD DANGEROUS. BECAUSE IT'S THE ONLY WAY TO RAISE 21:17:09 AWARENESS THAT OUR FOSSIL FUEL DEPENDANT LIFE IS ENDANGERING THE WHOLE OF HUMANITY. SO WE GO FROM MICRO RISK TO MACRO RISK. BUT RIGHT HERE AND NOW TO AVOID MICRO HAZARD FOR GODS SAKE STOP USING THIS ROAD. Caren Wildin "78431". 21:18:16 PC78431 Dodd "UM, UM, IT'LL BE ALL OVER YOUR PAPERWORK IN CUSTODY ANYWAY". 21:19:25 Caren Wildin "SO WHAT YOUR SAYING IS THAT YOU GUYS ARE FULLY AWARE THAT THERE'S, THAT THIS ROAD IS LIKE A HAZARD ZONE". PC78431 Dodd "WHAT D'YA MEAN". Caren Wildin "COZ OF WHAT I'VE BEEN SAYING. IF THERE'S A TUNNEL UNDER THIS ROAD IT'S A HAZARD ZONE TO PEOPLE UNDERNEATH AND PEOPLE ON TOP". PC78431 Dodd "WHAT I'M SAYIING IS THAT I'M SURE THAT THE DECISION MAKERS ARE FULLY AWARE OF ALL THE INFORMATION". Caren Wildin "BUT ARE YOU SURE. WHAT I'M SAYING IS PLEASE GO AND PASS THE MESSAGE ON BECAUSE SOMETIMES WE MAKE ASSUMPTIONS AND THAT THESE ASSUMPTIONS ARE WRONG. I'M ASKING YOU PLEASE TO JUST GO AND PASS A MESSAGE FROM ME TO SAY THAT NO TRAFFIC SHOULD BE COMING ALONG THIS ROAD. WHY ARE PEOPLE CONTINUING TO DRIVE. THERE'S A TUNNEL THERE RIGHT AND THEY'RE GOING UNDER THERE, WHY ARE PEOPLE USING THE BLOODY ROAD".

PC78431 Dodd "THEY'VE OBVIOUSLY JUDGED IT TO BE SAFE HAVEN'T THEY".

Caren Wildin "WELL THAT'S GONNA BE INTERESTING".

TO

TO

21:21:36 to 21:22:07 Caren Wildin shouts "JUST STOP OIL. PLEASE FOLLOW JUST STOP OIL ON THE WEBSITE. JUST STOP OIL WE'RE IN A CLIMATE EMERGENCY. PLEASE FOLLOW THE CAMPAIGN FOR THE FUTURE OF HUMANITY. YOUR CHILDREN, CHILDREN ALL ACROSS THE WORLD SUFFERING FROM THE CLIMATE EMERGENCY. PLEASE FOLLOW JUST STOP OIL". She then goes on to make political, environmental statements to herself as only PC78431 Dodd would hear these additional comments as they are spoken rather than shouted.

The target of the shouted comments would again appear to be the growing number of drivers that had gathered having been prevented from continuing their journeys due to the protesters actions.



INTENTIONALLY BLANK

P. D. Walker PC1729 Paul Walker

21:36:02 Caren Wildin says "CHECK OUT JUST STOP OIL MATE ON THE WEBSITE JUST STOP".

to She is interrupted by a male voice that says "I'VE SEEN THE WEBSITE".

21:37:42 | Caren Wildin "JUST STOP OIL".

Male voice "KNOW WHAT IS STOPPING. MY BRAIN IS STOPPING. I HAD A MENTAL BREAKDOWN THREE DAYS AGO AND I'M CLOSE, THIS CLOSE TO HAVING ANOTHER ONE. YOU UNDERSTAND".

PC78431 Dodd appears to say "GUYS, JUST WALK".

Male Voice "WHY DO YOU DO THIS".

PC78431 Dodd "GUYS, JUST KEEP WALKING".

Male voice "I HAVE KIDS AT HOME YOU UNDERSTAND".

PC78431 Dodd "LADS (inaudible) MATE KEEP GOING".

Male voice "I HAVEN'T DONE ANYTHING WRONG YOU KNOW THAT".

PC78341 Dodd "YER. I'M JUST ASKING YOU TO LEAVE THE AREA".

Male voice "WHY DON'T YOU ASK THEM TO LEAVE THE AREA".

PC78341 Dodd "OK".

Caren Wildin shouts "IT'S A CLIMATE EMERGENCY MATE".

Male voice "YOU DON'T KNOW".

Caren Wildin shouts "IT'S A CLIMATE EMERGENCY".

Male voice "IT WAS AN EMERGENCY FIFTEEN YEARS AGO".

Caren Wildin shouts "YES I KNOW AND WHAT ARE WE DOING ABOUT IT. WE'VE ALL GOTTA DO SOMETHING ABOUT IT".

There is a short gap and then Caren Wildin says "THIS IS WHAT THEY SAID . THAT WE'LL EITHER ALL TURN AGAINST EACH OTHER OR WE WORK TOGETHER AND WE HAVE TO WORK TOGETHER". This comment would appear to have been made to PC78341 Dodd or herself and then goes on to make further general political and environmental statements.

(The unknown male is likely to have been one of the drivers that had been prevented from continuing their journey and was now walking away from the scene but having to pass the protesters to reach his destination).



21:40:35 As part of the general political and environmental statements Caren Wildin says "DIRECT ACTION, THERE'S NO OTHER OPTION".

# 21:42:36 Caren Wildin shuts out "SIGN UP TO THE JUST STOP OIL WEBSITE. PLEASE WE'RE IN A CLIMATE EMERGENCY". This appears to be called out to passing members of the public and the growing number of drivers (circled) that have been prevented from using the road due to the protester's actions. Caren then makes a comment to PC79341 Dodd or to her self "IF THE PUBLIC HAVE TO BE INCONVENIENCED IN ORDER TO GET ON BOARD LIKE EVERYONE NEEDS TO BE ON BOARD THEN SO BE IT. THAT'S MY VIEW. THE INCONVENIENCE TO THE PUBLIC NOW IS NOTHING COMPARED TO WHAT'S COMING DOWN THE LINE". Further general political and climate related comments made. 2022-08-28 21:42:36 +0100 AXON BODY 3 X60415137

21:44:24 Caren Wildin says "SO, I'M NOT SORRY FOR DISRUPTING THE PUBLIC. IF THE PUBLIC NEEDS TO BE DISRUPTED IN ORDER TO LET THEM REALISE THAT THIS IS NOTHING COMPARED TO WHAT'S COMING DOWN THE LINE". Followed by further general political and environmental comments.

21:47:48 Caren Wilden is driven away from the scene by PC78431 Dodd and another officer and taken to another waiting marked police vehicle further back along St Clements Way.

21:50:01 to 21:50:12 Caren Wildin is transferred from the marked police vehicle that she had been sitting in and into a marked police van where she is placed in the caged area at the rear of the vehicle.





21:51:35 This image shows the complete road closure at the junction of St Clements Way and London Road which had to be put in place due to the actions of the protesters.



As she climbs into the rear of the marked police van this is the first time that she provides any name details to police officers and she confirms that her name is 'Caren'.



22:09:14 Having been conveyed to the Grays Police Station, Caren Wildin is pictured in the waiting area of the custody suite.



22:11:24 | Caren Wildin is pictured at the custody desk inside the Grays Police Station custody suite.



22:15:22 Whilst PC78431 Dodd is providing the circumsatnces of the arrest and reasons for the arrest to the detention officer Caren Wilding says "WE WERE THERE TRYING TO PREVENT HARM".

22:15:48 As PC78431 Dodd explained that she had left her pedal cycle in the road and ran towards an oil tanker Caren Wilding says "TRYING TO STOP IT RUNNING OVER A DANGEROUS ROAD THAT'S BEEN LEFT OPEN BY THE AUTHORITIES".

22:17:36 PC78431 Dodd turns his BWV off.

INTENTIONALLY BLANK

P.D. Walker PC1729 Paul Walker

Source: BWV – Arresting Officer

**BWV Clip Number: None** 

Officer name (BWV): PC 78431 Dodd
Date Shown on footage: 28/08/2022
Start time Shown on Footage: 22:43:01
Is there a delay in audio starting? Yes
Duration of footage: 11 minutes 18 seconds

Duration of footage viewed from: Start AXON BWV Reference (8 digits): X60415137

Officer Exhibit Ref: JD/07

Axon Platform start time: N/A Real time (if different GMT): N/A If yes how long? 59 Seconds

Duration of footage viewed to: Finish

Holmes Exhibit ref:

PC78341 Dodd activated his BWV whilst in the custody suite at Grays Police Station where he was in the process of booking Caren Wildin into custody and she and her property were in the process of being searched.

There is no GPS location map available for this activation.



This image shows the folded 'Just Stop Oil' banner that had been removed from the rucksack of Caren Wildin.



22:44:12 Caren Wildin was informed that her mobile phone was being seized and as the sound activates on his BWV PC78431 Dodd says "I WILL JUST RE-ASK YOU AS MY COLLEAGUE HAS STATED WHILE MY BODY WORN WAS NOT RUNNING. IT IS AN OFFENCE (inaudible) PROSECUTED TO NOT GIVE YOUR PHONE AND WE ARE SEIZING YOUR PHONE ARE YOU WILLING TO GIVE US YOUR PIN AT THIS TIME".

Caren Wildin replies "NO COMMENT".

PC78431 Dodd "(inaudible) TAKE THAT AS A NO" there is a short gap and then PC78431 Dodd says "NOT WILLING TO GIVE US YOUR PIN NUMBER TO YOUR PHONE" to which Caren Wildin makes no reply.



22:45:32 PC81307 Devine conducts the body search of Caren Wildin in custody. (She has no BWV of this search.



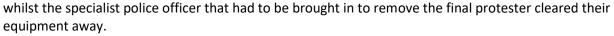
22:51:25 Caren Wildin complans about the use of an ultra violet torch as part of the search process and in particular that it was shone around her head and face.

22:54:19 PC78431 Dodd turns off his BWV.

Police were already present on St Clements Way, West Thurrock, Grays, Essex when four protesters from the 'Just Stop Oil' campaign took action that caused an obstruction of the highway by dropping the bicycles they were riding on the road and thereby obstructing the passage of traffic. One protester climbed up onto the cab of a fuel tanker whilst another attempted to use a drill to puncture one of the fuel tankers rear tyres.

Caren Wildin was one of the four protesters. Her part was to ride infront of the fuel tanker and then stop and lay her bicycle in the road in the path of the fuel tanker and run towards the vehicle causing it to stop.

The protesters action has commenced at about 1930 hours on 28/08/2022 and the final protester, who was the one on the top of the fuel tanker was removed at about 0030 hours on 29/08/2022. The road had therefore been obstructed and closed to vehicular traffic for about 5 hours, although the closure continued for a short while after removal of the last protesters



St Clements Way forms part of a 'horseshoe' along with Stoneness Road that gives access to an industrial estate which amongst other businesses contains a fuel storage facility. These two roads are the only way in and out of the industrial estate. Due to protester action that had started a few days earlier, and was still ongoing at the time of this incident, Stoneness Road was closed to all vehicular traffic making St Clements Way the only way in and out of the industrial estate. During this incident not only were the drivers of fuel tankers prevented from going about their business but other members of the public were prevented from travelling into work or travelling home from work during the period of the road closure.

The image here is an image of Caren Wildin obtained during the custody procedure where she was allocated the custody reference number 42BZ/2533/22.

### **Initial Disclosure Assessment of footage**

For disclosure I have considered whether there is any material which might reasonably be considered capable of undermining the case for the prosecution against the accused, or of assisting the case for the accused. Any material required to be supplied under paragraph 7.3 of the code.

Supply Details: None

Signature of reviewing officer:

P.D. Walker PC1729 Paul Walker

Time/Date of completion: 0900 hours on Wednesday 12<sup>th</sup> October 2022

### **Check List: (tick when complete)**

- 1. Update the DS of your completion.
- 2. Notify OIC/Disclosure officer of anything evidential or meeting disclosure test
- 3. Has officer provided a statement producing footage?
- 4. Has BWV Officer Exhibited BWV correctly:
- 5. Has BWV Officer Exhibiting BWV saved footage correctly?
- 6. Ensure footage burnt to disc
- 7. Ensure exhibit is on HOLMES
- 8. Place review document into MIR Submitted for Holmes folder for registration.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

### (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)
- (226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

# FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

		<u>Defendants</u>
EXI	HIBIT "JS/101"	

Address – I

Contact Details - None Provided.



42/MR/17715/22 Obstruct / Disrupt person engaged in lawful activity.

Circumstances of this investigation are MATTHEWS has been detained by Police at 12:26 hours on the 23<sup>rd</sup> of august 2022 at Exolum Fuel Storage site, Askews Farm, Lane, Gray. Essex. At approximately 06:00 hours on the 23<sup>rd</sup> August MATTHEWS and five other Just Stop Oil Direct action protesters gained entry to the secure refuelling compound located within the Exloum fuel storage site. On gaining entry MATTHEWS was challenged by staff but refused to leave, she then climbed equipment to reach the fuel pipes contained within the roof space of the pumping station. MATTHEWS sat on those pipes forcing the plant to halt all activity. Police specialist at working heights removal teams were required to remove MATTHEWS. This protest prevented the Exolum site from performing normal activity for over 10 hours.

Arresting officer Pc 80171 Barnes, Arrest MG11 attached.

Evidential Media Form completed by Pc 73659 Skinner, Exhibit JLS/BWV/H2/05 attached.

Police Case material report to CPS MG5 has been attached detailing the particulars of the criminal case.

Result – Community Order 40 hours unpaid work, £200 costs, £114 surcharge.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

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**Claimants** 

-and-

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/102"	

Page 1 of 3

WITNESS STATEMENT  Criminal Procedure Rules, r. 16.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B				30, s.5B
URN				
Statement of: Dale BARNES				
Age if under 18: Over 18 (if over 18 insert 'over 18') Occupation: Po	lice Co	onstab	le 80171	
This statement (consisting of 3 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.				
Signature:(witn	ess)	Date:	23/08/202	2

On TUESDAY 23<sup>rd</sup> AUGUST 2022, I was on duty in full police uniform as WK40 and asked to attend a silver reserve call out to attend GRAYS FIRE STATION for operation hazel regarding fuel protests within THURROCK and on this day, I arrested two persons for aggravated trespass.

At approximetly 07:30 I was made aware by my airwaves that a public order call out had been called and that as a silver reserve officer I was to attend GRAYS FIRE STATION and await further instructions.

On attending GRAYS FIRE STATION as WK40, I was tasked to attend ASKEWS FARM LANE to the fuel terminal whereby four persons had got onto the site and got onto the pipework causing the fuel terminal to cease work. Whilst there I was tasked to patrol the pipe work to prevent the persons coming from the pipes, whilst doing this I have walked up and down and through have noticed 4 persons sitting on the pipes which are in aisle formation from A-L On aisle "H" was a protester that I now know to be Jade CALLAND which I have confirmed by looking at custody photographs which I have made a verbal description saying that it appeared to be a white male, with brown curly hair on top and a side shaved.

between aisle "J" and "K" was a male I would describe as a white male who had white long hair with a black hair band wearing an orange high vis with a black skull logo on I will refer to him as JK male throughout this statement.

Signature: 50.19.	Signature witnessed by:	
16/08/17	OFFICIAL	

### **OFFICIAL**

MG11 (Interactive)

Page 2 of 3

At aisle "L" there where two persons one I could not see well enough to describe however saw this be a white person wearing glasses who I now know to be Kayleigh MATTHEWS which I have confirmed by checking custody photographs and a male who I know now as Stephen GINGELL who I would describe as a white male, with a bald head and grey beard but was unable to see the males clothing.

I was tasked to attend the security office as a security guard had taken a bag which he had seen be left by a protestor, who I know now to be Sam HOLLAND being identified through being asked around the bag, and took to the office – on looking in the bag to find an identifying object I have found a banner of "just stop oil" and a tabard of the same branding, with three books, bottles of water and sandwiches which I have taken for safekeeping which I will exhibit as DJB/02

This interaction has been caught on my body worn and I will exhibit this as DJB/01

I have reactivated my body worn video when the protestor removal team where ready to start removing the protestors as to capture this, on going up I could see that CALLAND was avoiding officers and was moving around on the pipes, JK MALE had unattached himself from the pipes and started moving around on pipes avoiding officers.

CALLAND was taken down from the gantry after being arrested and conveyed to GRAYS CUSTODY I can confirm that this was the person who I initially saw sitting on aisle "H"

The Protestor removal team have started the process to remove GINGELL and the other person and I have gone up into the cherry picker and I have asked if the two persons could hear me which they said they could so I have said "THE TIME IS 12:16 YOU ARE UNDER ARREST FOR AGGRAVATED TRESPASS, YOU DO HAVE TO SAY ANYTHING BUT IT MAY HARM YOUR DEFENCE IF YOU DO NOT MENTION WHEN QUESTIONED SOMETHING YOU LATER RELY ON IN COURT ANYTHING YOU DO SAY MAY BE USED IN EVIDENCE THE REASON FOR YOUR ARREST IS FOR A PROMPT AND EFFECTIVE INVESTIGATION BY MEANS OF QUESTIONINNG AND TO PREVENT FURTHER DAMAGE, DO YOU UNDERSTAND?" which GINGELL and MATTHEWS said they did.

Signature: 50.3	Signature witnessed by:

2010/11

### **OFFICIAL**

MG11 (Interactive)

Page 3 of 3

On awaiting the persons to be removed it had been mentioned that the person had locked them selves on to either themselves or the structure and were being removed by the protestor removal team. The first to be removed was GINGELL and he was bought down on the cherry picker and when he reached the bottom, I went over and asked him his name which he confirmed as "STEPHEN" and I passed him to my colleague for him to be searched and to be conveyed to custody. I waited until MATTHEWS was bought down and asked what her name was which she replied with "CAN I TELL YOU THAT IN CUSTODY?" which I said she could, I have searched her pockets to look for any glue that may cause her to glue herself to the inside of the police vehicle or carrier.

I have taken MATTHEWS from the structure into the rear of the police vehicle to be conveyed GRAYS CUSTODY. When at GRAYS CUSTODY due to how loud it was at the scene, I had repeated that they were arrested for the offence of aggravated trespass, in which her bag was searched by officers booking her in and they have noticed she had an orange high vis tabard with a black logo which I will exhibit as DJB/03 and a harness and rope as DJB/04. A full length photograph of MATTHEWS was taken in custody and exhibit this as DJB/05

This interaction was caught on Body worn video and this will be exhibit as DJB/06.

I activated my Body worn video (BWV) at 08:15, which recorded for 1 hour 23 minutes 0 seconds.

AXON BWV Reference (8 digits): X60411461

I Produce this BWV as my exhibit DJB/01

I activated my Body worn video (BWV) at 11:42, which recorded for 1 hour 53 minutes 21

AXON BWV Reference (8 digits): X60411461

I Produce this BWV as my exhibit DJB/06

seconds.

STATION.

These are my original notes made on TUESDAY 23rd AUGUST 2022 at GRAYS POLICE

Signature: Sold Sold Signature witnessed by:

2010/11 OFFICIAL

80171

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

### (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
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# FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

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(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/103"	

## Evidential Media Form - JLS/BWV/H2/05 - Kayleigh MATTHEWS

Reviewing Officer Name: Pc 73659 Skinner

Review date: 27/09/2022

Review time start: 11:00 - 27/09/2022 Review time finish: 15:00 - 07/10/2022

This form has been generated from the viewing of officers Body Worn Video.

This form has been generated to show the scene at EXOLUM Askews Farm Lane, Thurrock, Essex and the actions of the Just Stop Oil protesters involved.

To show continuity at the beginning of every media source used you will see the below – this is to ensure you as the reader can understand what the media is, who it is from, the date and duration. This will then show how the timeline has been formed and via what media source.

If yes how long?

Source: BWV / Evidence gatherer footage / Custody image.

**BWV Clip Number:** 

Officer name (BWV/Evidence gatherer user):

Date Shown on footage: Axon Platform start time: Start time Shown on Footage: Real time (if different GMT):

Is there a delay in audio starting? Y/N

Duration of footage:

Duration of footage viewed from:

Duration of footage viewed to:

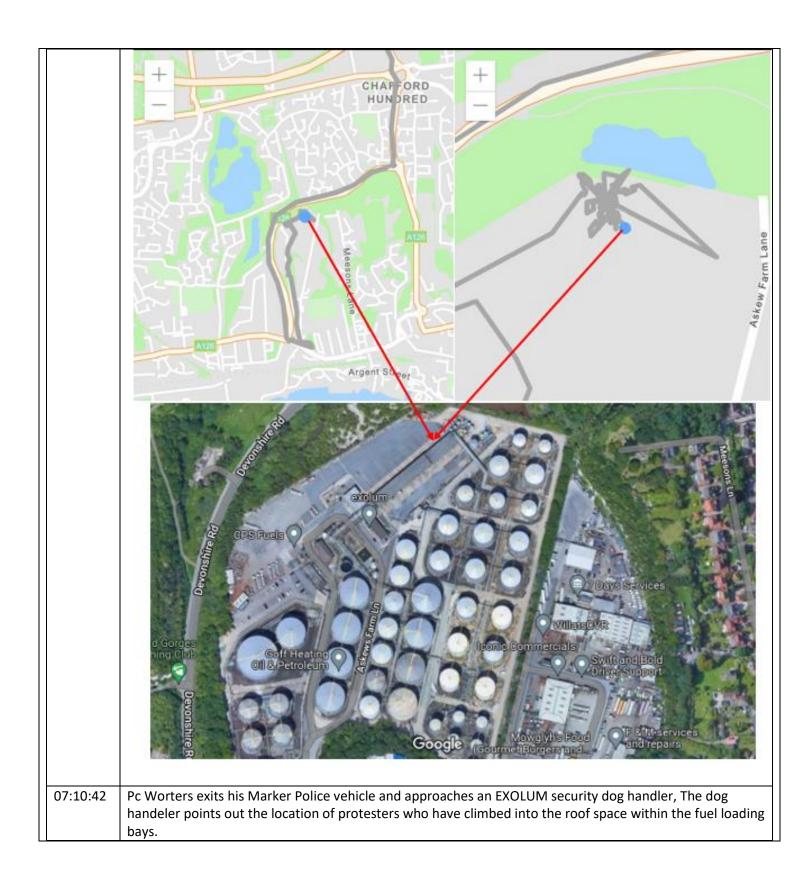
AXON BWV Reference (8 digits): Holmes Exhibit ref:

Officer Exhibit Ref:

Summary (Must have sufficient details to satisfy a review under provisions of CPIA)

Consider screen captures and direct speech and include counter times.

Screen	Caucan		
Display	Summary		
Time	Highlight any information requiring redacting/editing		
(NOT	I mg. mg. re diriy i m o m n	ation requiring readom, by carting	
counter			
time)			
,	Source: BWV		
	BWV Clip Number: Whole footage		
	Officer name (BWV/Evidence gatherer user): Pc 71562 Worters		
	Date Shown on footage: 23/08/2022	Axon Platform start time: 07:10	
	Start time Shown on Footage: 07:10:28	Real time (if different GMT): N/A	
	Is there a delay in audio starting? Yes	If yes how long? 59 Seconds	
	Duration of footage: 1:45:04		
	Duration of footage viewed from: Start	Duration of footage viewed to: Finish	
	AXON BWV Reference (8 digits): X60418537	Holmes Exhibit ref:	
	Officer Exhibit Ref: TWW/01		
07:10:42	Pc 71562 Worters is the driver of a Police carrier VG1B that has been allocated to deal with the protesters who have gained unlawful access to the EXOLUM fuel storage site Askews Farm Lane, Grays, Essex. Pc		
	Worters and his passengers arrive in the carpa	rk area in front of the fuel loading bays within the EXOLUM	
	complex. Pc Worters BWV GPS Location Map s	shows his location within the complex. A Google maps image	
	shows an aerial view of the location.		





O7:11:10 Pc Worters enters the fuel loading bays with Pc 73309 Sharplin and identifies where protesters are in the roof space. Due to the darkness in the roof space, Pc Worters BWV does not capture any images of the persons in the roof space. Pc Worters walks the length of the loading bays and counts off four protesters within the roof space.



Source: BWV

BWV Clip Number: Whole Footage Officer name (BWV): Pc 2796 Mint Date Shown on footage: 23/08/2022 Start time Shown on Footage: 07:06:17 Is there a delay in audio starting? Yes

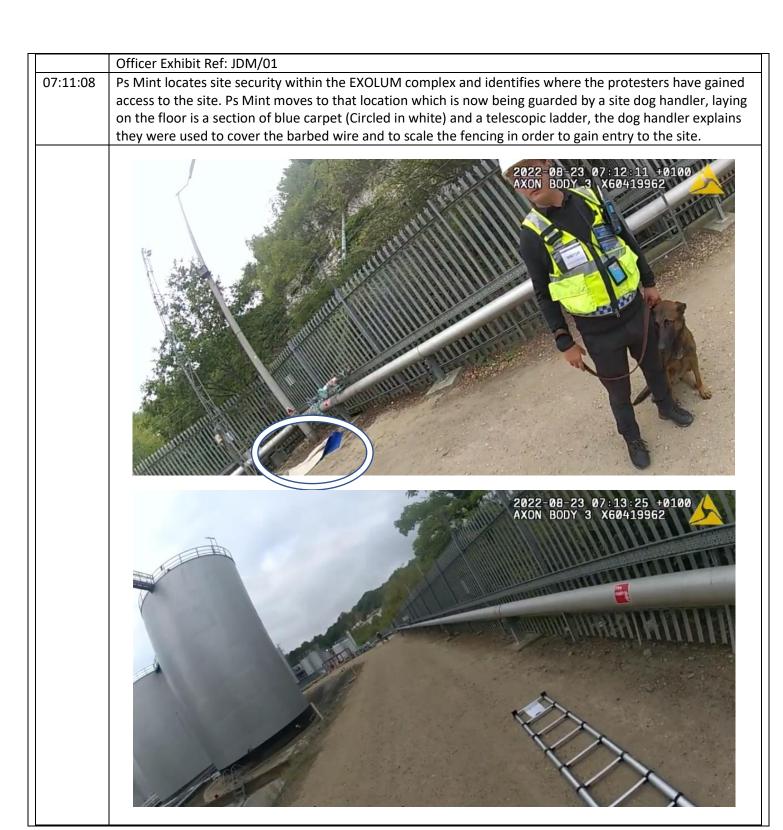
Duration of footage: 15:55

Duration of footage viewed from: Start AXON BWV Reference (8 digits): X60419962

Axon Platform start time: 07:07 Real time (if different GMT): N/A If yes how long? 59 Seconds

Duration of footage viewed to: Finish

Holmes Exhibit ref:





Source: BWV

BWV Clip Number: Whole Footage

Officer name (BWV/Evidence gatherer user): Pc 73309 Sharplin

Date Shown on footage: 23/08/2022 Axon Platform start time: 07:15
Start time Shown on Footage: 07:14:19 Real time (if different GMT): N/A
Is there a delay in audio starting? Yes If yes how long? 59 Seconds

Duration of footage: 21:30

Duration of footage viewed from: Start

AXON BWV Reference (8 digits): X60418422 Holmes Exhibit ref:

Officer Exhibit Ref: IS/01

O7:18:35 Pc 73309 Sharplin is nominated by Ps 2796 Mint as the officer to accompany the representative from the EXOLUM site. He and Nick are to make the appeals for all protesters to leave the site. EXOLUM site rep Nick is circled in white. Pc Sharplin receives a short briefing on the five step appeal from Ps Mint.

Duration of footage viewed to: Finish



### 07:25:00

Pc Sharplin and the site rep Nick approach the loading bay L where two protesters (circled in Orange) are sitting on the pipes in the roof space. Nick calls out to the pair then informs them that they are trespassing, he informs them of the dangers their presence possess in that area due to the flammable atmospheres, Nick requests that they come down and leave the area. Once Nick has made his appeal, Pc Sharplin makes his appeal for them to come down from the roof space, he reiterates the danger that they are in and informs them they will be arrested for aggravated trespass. Neither of the protesters comply with either request to leave. Due to the height and darkness in the roof space the BWV only captures glimpses of the protesters, the orange vest and florescent yellow vest the pair are wearing and the protesters legs can be seen, when Nick and Pc Sharplin call up a male and female voice respond.



### 07:28:04

Pc Sharplin and the site rep Nick move down to loading bay K and approach a lone male protester (circled in Orange) who is sitting on the pipes in the roof space. Nick calls out to the male who acknowledges the hail, Nick then informs him that he is trespassing, he informs him of the dangers his presence possess in that area due to the flammable atmospheres, Nick requests that he comes down and leave the area. Once Nick has made his appeal, Pc Sharplin makes his appeal for him to come down from the roof space, he reiterates the danger that he is in and informs him he will be arrested for aggravated trespass. The protester does not comply with either request to leave. Due to the height and darkness in the roof space the BWV only captures the males legs when he moves them, at all other times he is fully obscured by the shadow.



07:30:57

Pc Sharplin and the site rep Nick move down the bays again to bay H and the approach a lone female protester (circled in Orange) who is sitting on the pipes in the roof space. Nick calls out to the female who acknowledges the hail, Nick then informs her that she is trespassing, he informs her of the dangers her presence possess in that area due to the flammable atmospheres, Nick requests that she comes down and leave the area. Once Nick has made his appeal, Pc Sharplin makes his appeal for her to come down from the roof space, he reiterates the danger that she is in and informs her she will be arrested for aggravated trespass. The protester does not comply with either request to leave. Due to the females position on the pipes in the roof space the BWV only captures her face, however due to the distance no distinct facial features can be made out.



07:32:33

All five protesters in the loading bay area of the EXOLUM site, Askews farm Lane, Grays have been informed by site staff and police that they are trespassing, all have been requested to leave. All five protesters have acknowledged the requests and have refused to leave. Pc Sharplin deactivates his BWV. Source: Evidence Gatherer

BWV Clip Number: 00008

Officer name (BWV/Evidence gatherer user): Pc 72527 Baker

Date Shown on footage: 23/08/2022 (Verbal) Axon Platform start time: N/A Start time Shown on Footage: 07:24 (Verbal) Real time (if different GMT): N/A If yes how long? N/A

Is there a delay in audio starting? No

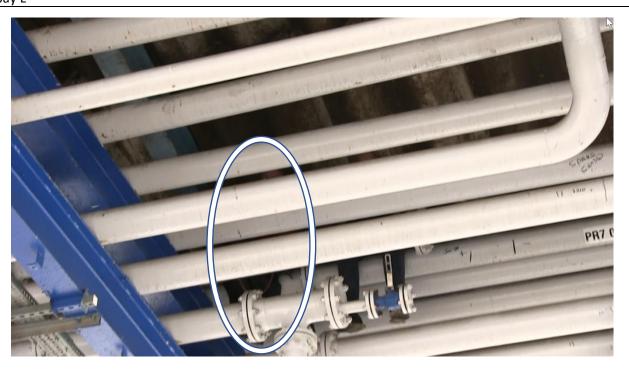
Duration of footage: 1:57

Duration of footage viewed from: Start Duration of footage viewed to: Finish

AXON BWV Reference (8 digits): N/A Holmes Exhibit ref:

Officer Exhibit Ref: KB/01A Disk 1

07:24 Pc 72527 Baker records the EXOLUM site representative ad Police informing Protesters that they are Trespassig and are required to leave, Pc Backer records MATTHEWS (Circled in white) in the roof space of bay L







Source: BWV

**BWV Clip Number: Whole Footage** 

Officer name (BWV/Evidence gatherer user): Pc 80171 Barnes

Date Shown on footage: 23/08/2022 Start time Shown on Footage: 11:41:46 Is there a delay in audio starting? Yes

Duration of footage: 01:53:21

Duration of footage viewed from: Start AXON BWV Reference (8 digits): X60411461

Officer Exhibit Ref: DJB/06

Axon Platform start time: 11:42 Real time (if different GMT): N/A If yes how long? 59 Seconds

Duration of footage viewed to: Finish

Holmes Exhibit ref:

11:41:46 Pc 80171 Barnes activates his BWV and records the at heights team praparing to remove protetsters including MATTHEWS from the roof space.



12:26:48c

Pc Barnes accends in a boon lift to the roofspace where MATTHEWS is sitting on the pipes, Pc Barnes asks if MATTHEWS can hear him, MATTHEWS confirms that she can. Pc Barnes then arrests MATTHEWS for agravated trespass and cautions her then provides the nesasity for the arrest. Pc Barnes does remove his BWV but does not possition it in a way that captures a clear image of MATTHEWS, MATTHEWS is sitting on the pipes and is obscured by the blue beam to the left of the at heights officer, just the bottom of MATTHEWS shoes can be seen indicated by a white arrow. MATTHEWS makes no comment following arrest.



13:14:22

MATTHEWS is lowered to the boon lift by the at heights team and then lowered to the ground. Once on the ground the at heights team de-harness and hand MATTHEWS over to Pc Barnes, Pc Barnes asks MATTHEWS her name, MATTHEWS replies "CAN I GIVE THAT AT THE STATION". Pc Barnes then undertakes

a search of MATTHEWS as there are no female officers present. Pc Barnes then escorts her with Ps Mint to a waiting Police carrier. MATTHEWS is silent during her conveyance to Grays Police station.









Source: Evidence Gatherer BWV Clip Number: 00000

Officer name (BWV/Evidence gatherer user): Pc 72527 Baker

Date Shown on footage: 23/08/2022 (Verbal) Axon Platform start time: N/A Start time Shown on Footage: Unknown Real time (if different GMT): N/A

Is there a delay in audio starting? No

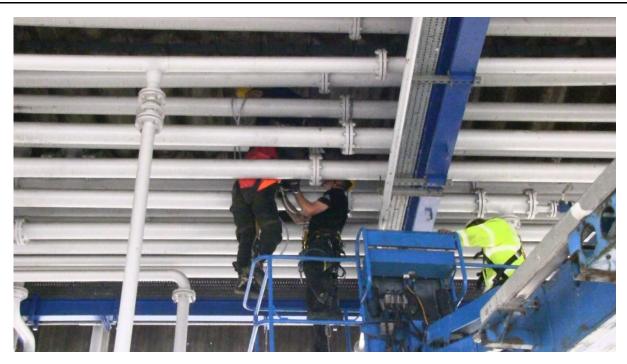
Duration of footage: 08:08

Duration of footage viewed from: Start Duration of footage viewed to: Finish AXON BWV Reference (8 digits): N/A Holmes Exhibit ref:

AXON BWV Reference (8 digits): N/A Officer Exhibit Ref: KB/02A Disk 1

Pc 73527 Baker records the at hights team at work as they attach safety harneses and ropes to MATTHEWS prior to lowering her down from the pipes in the roof space area. MATTHEWS is lowered to the ground in the Boon lift, once on the ground the at heights team hand MATTHEWS over to the Essex officers, who escort her out of the fuel loading bay.

If yes how long? N/A





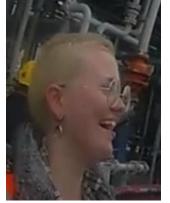


The images above show MATTHEWS at the EXOLUM fuel storage site on the 23<sup>rd</sup> August 2022, MATTHEWS has gained unlawful access to the site and has been requested to leave by both site staff and Police but has refused. The footage shows MATTHEWS being informed by site staff and Police that she is trespassing. The footage shows MATTHEWS in the roof space, where she sits on the fuel pipes. It also shows MATTHEWS being Arrested for aggravated trespass by Pc Barnes, then her removal by the at heights team.

The images below have been obtained from Pc Barnes BWV footage following GINGELL's arrest at the EXOLUM site, and a photo taken during his custody booking in process where GINGELL was allocated the custody reference number -42BZ/2474/22









During the creation of this exhibit I fully reviewed the BWV footage of Ps 2796 Mint, Pc 77543 Baldwin, Pc 73309 Sharplin, Pc 78511 Roll, Pc 80072 Clarke, Pc 80171 Barnes, Pc 78971 Harper, Pc 71562 Worters and the Evidence Gatherer footage presented by Pc 72527 Baker. Most of that material is not represented in this Exhibit, however none of that material I reviewed contained anything that could undermine this investigation or assist the defence at court.

## **Initial Disclosure Assessment of footage**

For disclosure I have considered whether there is any material which might reasonably be considered capable of undermining the case for the prosecution against the accused, or of assisting the case for the accused. Any material required to be supplied under paragraph 7.3 of the code.

**Supply Details:** 

Signature of reviewing officer:

c 73659 Skinner

Time/Date of completion: 15:00 – 07/10/2022

## **Check List: (tick when complete)**

- 1. Update the DS of your completion.
- 2. Notify OIC/Disclosure officer of anything evidential or meeting disclosure test
- 3. Has officer provided a statement producing footage?
- 4. Has BWV Officer Exhibited BWV correctly:
- 5. Has BWV Officer Exhibiting BWV saved footage correctly?
- 6. Ensure footage burnt to disc
- 7. Ensure exhibit is on HOLMES
- 8. Place review document into MIR Submitted for Holmes folder for registration.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

## (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
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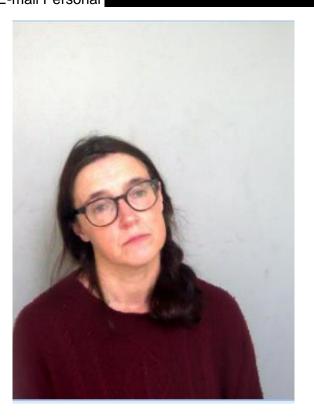
(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

		<b>Defendants</b>
J	EXHIBIT "JS/104"	

# Margaret Reid 14/01/1971

Address – I

Contact Details — Mobile Phone E-mail Personal



42/MR/17715/22 Aggravated Trespass.

Circumstances of this investigation are REID has been detained by Police at 07:44 hours on the 23<sup>rd</sup> August 2022 at Exolum Fuel storage, Askews Farm Lane, Grays, Essex. At approximately 06:00 hours on the 23rd August REID and five other Just Stop Oil Direct action protesters gained entry to the secure refuelling compound located within the Exolum fuel storage site. On gaining entry REID was challenged by staff but refused to leave, she was then detained by an Exolum manager who escorted her to the front gate of the complex. REID was handed over to Police at the gate and found to be in possession of bolt croppers and Just Stop Oil related material. Due to the action of REID and the other protesters the plant to halt all activity. This protest prevented the Exolum site from performing normal activity for over 10 hours.

Arresting Officer Pc 78511 Roll, Arrest MG11 attached.

Evidential Media Form completed by Pc 73659 Skinner, Exhibit JLS/BWV/H2/02 attached.

Police Case material report to CPS MG5 has been attached detailing the particulars of the criminal case.

Result – Community order 80 hours unpaid work, £200 Costs, £114 Surcharge.

42/MR/17897/22 Having article to destroy / damage property.

Circumstances of this investigation are REID has been detained by Police at 20:26 hours on the 28<sup>th</sup> August 2022 at St Clements Way, Grays, Essex. On the 28<sup>th</sup> August 2022 Police were on scene at St Clements Way dealing with an ongoing Just Stop Oil protest, while dealing with that protest officers have seen REID running towards a fuel tanker. Officers have given chase and REID has stopped and sat in the carriageway, REID was detained and lifted out of the road immediately. Officers found her hands to be pre-primed with super glue with a tube of glue stuck to one hand. Superglue was also located on REID's person.

Arresting Officer Pc 79090 Garland, Arrest MG11 Attached.







Result – No Further Action.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

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# FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/105"	

Page 1 of 2

# WITNESS STATEMENT Criminal Procedure Rules, r. 16.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B URN Statement of: Callum ROLL Age if under 18: Over 18 (if over 18 insert 'over 18') Occupation: Police Constable 78511 This statement (consisting of 2 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true. Signature: The Mark 18 (witness) Date: 23/08/2022

On Tuesday 23<sup>rd</sup> August 2022 I have been assigned to Op Hazel which is an operation designated to protect key sites throughout the county against protests designed to disrupt and shut down key infrastructure in Essex. At the beginning of my duty we received a briefing detailing our deployment locations and informed to liaise with Bronze Inspector prior to arresting a protestor providing they are compliant and an immediate arrest was not required.

My duty consisted of 0500-1900hrs and I was assigned to serial VG1B. Whilst on-route to our designated site, at 0655hrs it was relayed security at an oil facility down ASKEWS FARM LANE, GREYS, ESSEX saw 10-20 protesters enter the site climbing the oil storage tanks. We have responded to the location which is the entrance of GOFF HEATING OIL & PETROLEUM and I've seen an unknown member of security escorting a female out of the site.

I have exited the van in company with T/PS 76604 MATTHEWS and spoke with a female who identified herself as MARGRET though wouldn't provide any further information to officers. MARGET was calm and compliant. From previous intelligence and my experience in previous deployments with environmental protestors I am aware a common tactic is to superglue themselves to key infrastructure causing damage to this and causing major disruptions. Based on this information at 0725hrs I have informed MARGET that I was detaining her under S.1 PACE for the purposes of a stop search, MARGET stated she didn't believe we could do this as we were male however explained to her that although same sex searching is preferred it is not mandatory under this power and that I needed to search her. I provided the above information to MARGRET in line with GOWISELY and proceeded to search her rucksack whilst T/PS MATTHEWS observed MARGRET and got her to show him the contents of her pocket. During this search I found a large pair of **bolt croppers**, **garden secateurs**, **orange tabard with black skull decal (which I believe linked her to the protestor movement) & gloves**. During this search I was liaising with my serial Sergeant, PS 2796 MINT who was in company with Bronze Inspector Insp Austin, whilst liaising I suggested arresting for Conspiracy to Commit a Public Nuisance however advised to arrest MARGRET for

Signature: Nell 785/1	Signature witnessed by:
16/08/17	OFFICIAL

Page 2 of 2

possession of an offensive weapon. Due to MARGRET having in her possession bolt croppers believed to intended to access the site by cutting open fences I did not know why she would have on her person a sharp bladed instrument and believed Insp Austin had further information to suggest this article would be intended for harm, based on this I formed the suspicion she had the article on her to cause harm. I arrested MARGRET at 0744hrs for possession of offensive weapon and cautioned her to which she gave no significant reply, my necessities for arrest were for a 'prompt and effective interview by means of questioning' & 'to prevent harm to any person'. We conveyed MARGET to custody where we arrived at 0922hrs and during booking in I have further arrested MARGRET for possession of an article with intent to commit criminal damage due to the bolt cropper in her possession and reports of protestors gaining access to sites by cutting fencing and suspecting the bolt croppers were in her possession for this reason. I arrested her at 1026hrs and cautioned her to which she gave no significant reply. My necessities for arrest were for a 'prompt and effective interview by means of questioning' & 'to prevent damage to any property'.

MARGET was then booked into Colchester Custody where she gave the name Margret REID, she was accepted under custody reference **42EZ/2288/22** and was stripped searched by two female officers. Following this search they retrieved 2 x tubes of superglue from a discreet pocket in the rear of MARGRET's leggings. I will exhibit all the above items below.

## I exhibit the following

CJR/01 BWV of Attendance & Arrest of Margret REID 23/08/22

CJR/02 Garden Secateurs

CJR/03 Bolt Croppers

CJR/04 Orange Tabard with Black Skull

CJR/05 Image of Seized Items

CJR/06 Gloves

2010/11

CJR/07 2 x Tubes of Super Glue

CJR/01 - CJR/04 were seized as evidence at 0744hrs & CJR/07 seized at 1026hrs.

THESE ARE MY ORIGINAL NOTES MADE AT COLCHESTER POLICE STATION AT 1208hrs on 23/08/2022

Signature: nell 78511	Signature witnessed by:
Signature: nell 785/1	Signature witnessed by:

**RESTRICTED** (when complete)

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

## (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<u>Defendants</u>
EXHIBIT "JS/106"	

# Evidential Media Form - JLS/BWV/H2/02 - Margret REID

Reviewing Officer Name: Pc 73659 Skinner

Review date: 27/09/2022

Review time start: 11:00 – 27/09/2022 Review time finish: 12:30 - 30/09/2022

This form has been generated from the viewing of officers Body Worn Video.

This form has been generated to show the scene at EXOLUM Askews Farm Lane, Thurrock, Essex and the actions of the Just Stop Oil protesters involved.

To show continuity at the beginning of every media source used you will see the below – this is to ensure you as the reader can understand what the media is, who it is from, the date and duration. This will then show how the timeline has been formed and via what media source.

Source: BWV / Evidence gatherer footage / Custody image.

**BWV Clip Number:** 

Officer name (BWV/Evidence gatherer user):

Date Shown on footage: Axon Platform start time: Start time Shown on Footage: Real time (if different GMT):

Is there a delay in audio starting? Y/N

If yes how long?

Duration of footage:

Duration of footage viewed from: Duration of footage viewed to:

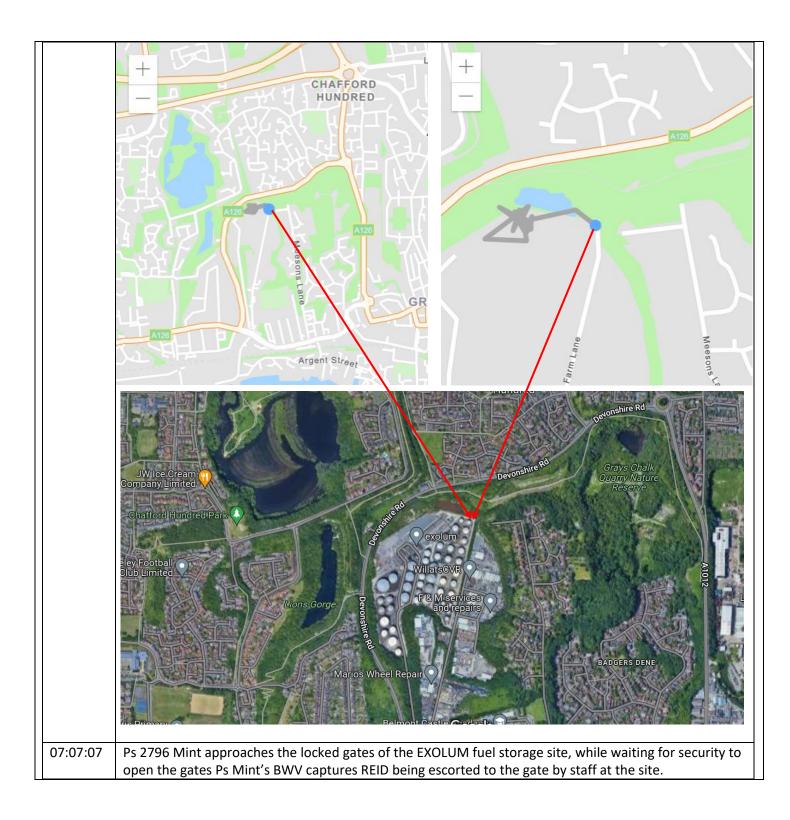
AXON BWV Reference (8 digits): Holmes Exhibit ref:

Officer Exhibit Ref:

Summary (Must have sufficient details to satisfy a review under provisions of CPIA)

Consider screen captures and direct speech and include counter times.

Screen Display Time (NOT counter time)	Summary  Highlight any information requiring redacting/editing		
	Source: BWV BWV Clip Number: Whole Footage Officer name (BWV): Pc 2796 Mint Date Shown on footage: 23/08/2022 Start time Shown on Footage: 07:06:17 Is there a delay in audio starting? Yes Duration of footage: 15:55 Duration of footage viewed from: Start AXON BWV Reference (8 digits): X60419962 Officer Exhibit Ref: JDM/01  Axon Platform start time: 07:07 Real time (if different GMT): N/A If yes how long? 59 Seconds Duration of footage viewed to: Finish Holmes Exhibit ref:		
07:06:17			





O7:07:17 Ps Mint activates his BWV as the Site staff open the gate, REID walks out from the site and speaks with Ps Mint, REID asks if she is free to go or if she has to stay, Ps Mint asks her to talk to one of the other officers and he goes and speaks to the site staff. On speaking to the site staff Ps Mint learns that there are other protesters on site, he leaves Pc 78511 Roll and T/Ps 76604 Matthews with REID and takes the rest of the carrier crew inside the complex.



07:07:22 | REID walks unassisted towards the officers that she is asked to speak to by Ps Mint.



O7:11:08 Ps Mint locates site security within the EXOLUM complex and identifies where the protesters have gained access to the site. Ps Mint moves to that location which is now being guarded by a site dog handler, laying on the floor is a section of blue carpet (Circled in white) and a telescopic ladder, the dog handler explains they were used to cover the barbed wire and to scale the fencing in order to gain entry







Source: BWV

07:06:28

BWV Clip Number: Full footage

Officer name (BWV/Evidence gatherer user): Pc 78511 Roll

Date Shown on footage: 23/08/2022 Axon Platform start time: 07:07
Start time Shown on Footage: 07:06:32 Real time (if different GMT): N/A
Is there a delay in audio starting? Yes If yes how long? 59 Seconds

Duration of footage: 1:22:19

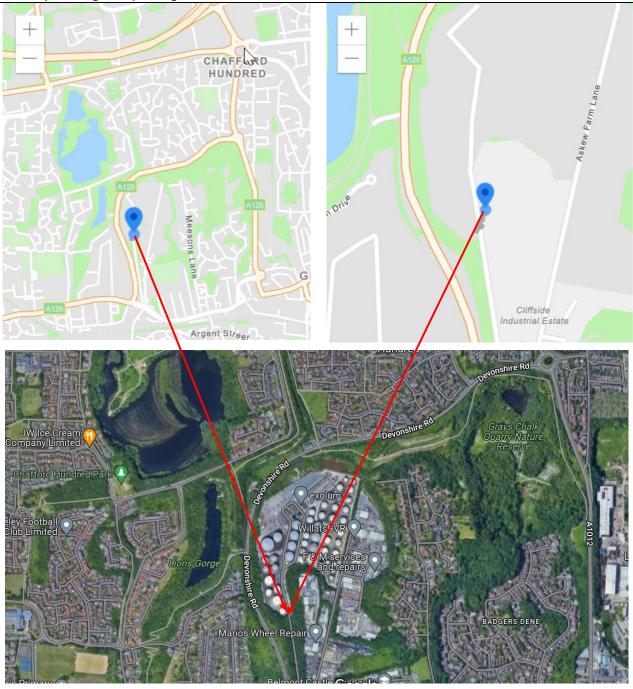
Duration of footage viewed from: Start Duration of footage viewed to: Finish

AXON BWV Reference (8 digits): X60412461 Holmes Exhibit ref:

Officer Exhibit Ref: CJR/01

Pc 78511 Roll arrives at the main gates of the EXOLUM fuel storage site, Grays, Essex. Pc Roll is part of the carrier crew VG1B that have been assigned to deal with the protester incursion at this site.

Pc Roll exits the carrier and approaches REID who has been asked to speak to him and T/Ps 76604 Matthews. Pc Roll's BWV GPS Location map shows the location where REID was brought to by the site security, a Google maps image shows an aerial view of the location.



O7:07:35 Pc Roll's BWV captures REID refusing to provide her name stating she will provide it at the Police station. T/Ps Matthews confirms REID does not want to provide details, then asks if REID has lawful reason to be at this site I.E does she work or have permission to be there. REID confirms she does not want to provide details, nor does she work at this location, REID elects to make no comment in relation to permission to be at the site. REID does provide her first name following a second request. Pc Roll cautions REID but at this point has not arrested her for any offences. REID states she does not accept the caution. Pc Roll then askes several questions all around the safety of any other protesters within the

complex, and the safety of officers and staff at the site. REID replies no comment. Pc Roll and T/Ps Matthews wait with REID at the gate for an update on what has transpired within the complex.



07:16:54 Pc Roll makes contact with the Ps Mint and Ins Gray within the EXOLUM site.

O7:22:33 Having contacted Ps Mint and Ins Gray Pc Roll informs REID that she will be subject to a section one search, the purpose of the search is to locate items which can be used to cause damage. REID explains she thought the search had to be conducted by a female Police officer, Pc Roll explains that same sex searches are compulsory only in custody, searching bags and outer clothing can be searched in a public space by any officer.



O7:23:42 Pc Roll begins his search by taking REID's backpack, while Pc Roll searching the backpack T/Ps Matthews asks REID to empty her pockets, and turn them out so he can see.



During his search of REID's backpack Pc Roll locates and seizes the following items – 07:28:36 Exhibit CJR/02 Garden Secateurs.



07:28:42 Exhibit CJR/04 Orange Tabard with Black Skull.



# 07:29:15 | Exhibit CRJ/03 Bolt Croppers



07:44:39

Pc Roll Completes his search of REID's back pack, during the search Pc Roll also locates and seizes a pair of heavy duty work gloves Exhibit CRJ/06 Gloves, due to the angle of Pc Roll's BWV the removal of these gloves from the backpack is not captured. Pc Roll will later take a photo of all of the items that he locates and seizes from the backpack Exhibit CRJ/05 Image of seized items.



O7:44:44 Pc Roll Arrests REID for being in possession of an offensive weapon namely garden secateurs, Pc Roll cautions REID, he also provides the necessity for the arrest and explains why he does not intend to cuff REID. REID confirms she understands but makes no other comments in relation to the offence for which she has been arrested. Pc Roll remains with REID while they wait for transport to custody, REID discussed the climate issues among other topics while they wait.



O8:27:07 Pc Roll waits with REID with his BWV running until 08:27:08 when a Police carrier arrives at his location. REID is placed on board the carrier to be conveyed to Colchester custody. Once REID is on board the carrier Pc Roll deactivates his BWV.



Source: BWV

BWV Clip Number: Whole Footage

Officer name (BWV/Evidence gatherer user): Pc 76604 Matthews

Date Shown on footage: 23/08/2022 Axon Platform start time: 07:07
Start time Shown on Footage: 07:07:09 Real time (if different GMT): N/A
Is there a delay in audio starting? Yes If yes how long? 7 Seconds

Duration of footage: 1:15:49

Duration of footage viewed from: Start Duration of footage viewed to: Finish

AXON BWV Reference (8 digits): X6040176W Holmes Exhibit ref:

Officer Exhibit Ref:

07:07:09 T/Ps 76604 Matthews activates his BWV, T/Ps Matthews is with REID at the front gates to the EXOLUM fuel storage facility, Grays, Essex. T/Ps Matthews states he has just seen REID being escorted from the facility, he asks REID what her connection with the site is. REID states she does not work at the location but answeres no comment when asked if she has permission to be on the site. T/Ps asks for REID's details which she initially refuses to provide, REID does provide her fiest name to assist with

communication.



07:11:00

T/Ps Matthews asks REID if she has anything on her that she shouldn't have or is going to hurt her or anyone else, REID replies no and states she is non violent. REID goes on to say she has expeienced violence from the security within the complex, REID states "THEY WERE SHAKING THE LADDERS TRYING TO KNOCK PEOPLE OFF WHICH WAS QUITE DANGERIOUS" REID makes a further comment but this is too muffled to make out. REID then says "THEY WERE TRYING TO PULL PEOPLE OFF" "OBVIOUSLY I SEE THEIR POINT OF VIEW" T/Ps Matthews responds by stating what they themselves are doing is quite dangerious. REID replies "I JUST FEEL I SHOULD MENTION IT WHAT HAPPENED, BECAUSE THEY COULD HAVE LET US GET THERE, AND THEN THEY COULD HAVE...YOU KNOW I WALKED OUT OF THERE PERFECTLY PEACFULLY WITH THEM, AND IF THEY HAD CHOSEN TO GO DOWN THAT ROUTE IT WOULD HAVE PUT FEWER PEOPLE T RISK" REID then fall silent and does not speak again about her presence inside the complex.



07:21:58

T/Ps Matthews BWC captures Pc Roll telling REID that she will be serched under section one of P.A.C.E, the grounds and objective of the search are provided. At 07:23:08 T/Ps Matthews asks REID if she has

anything in her pockets, REID replied "BITS OF PAPER NOTHING", T/Ps Matthews asks REID to turn her pockets out for him, REID complies but due to the angel of the BWV only the top hald of her body is captured. T/Ps Matthews asks if REID has a back pocket, REID does not answer just turns round, T/Ps Matthews in unable to see the discreet pocket that is located on the back of REID's trousers, two tubes of superglue will be located in this pocket during the custody search. T/Ps Matthews makes no physical contact with REID during this search. On conclusion of the search T/Ps Matthews remains with REID and Pc Roll with his BWV running.



Source: BWV

BWV Clip Number: Whole Footage

Officer name (BWV/Evidence gatherer user): Pc 73309 Sharplin

Date Shown on footage: 23/08/2022 Axon Platform start time: 07:15
Start time Shown on Footage: 07:14:19 Real time (if different GMT): N/A
Is there a delay in audio starting? Yes If yes how long? 59 Seconds

Duration of footage: 21:30

Duration of footage viewed from: Start Duration of footage viewed to: Finish

AXON BWV Reference (8 digits): X60418422 Holmes Exhibit ref:

Officer Exhibit Ref: IS/01

07:30:00

Pc Sharplin and three members of EXOLUM staff discuss how many protetsers there are at this site, how they got in and how many they have left to deal with. The site staff state six protesters gained access by throwing carpet onto the barbed wire and climbing over the fence, and a simular number were detered. One of the protesters (REID) was aprehended by site staff and escorted to the front gate immediately, The Site staff member circled in white informs the others that he took the female to the front gate. Pc Sharplin confirmes that the female protester that was aprehended and escorted to the front gate (REID) is with Police at this time.



The images above show REID at the EXOLUM fuel storage site on the 23<sup>rd</sup> August 2022, REID has gained unlawful access to the site, REID has been apprehended as she gains entry to the site and is escorted out by site security. The footage shows how REID and the other protesters gained unlawful entry to the site, REID being escorted to the front gates by site security. The footage shows REID being searched by Pc Roll and the recovery of protest related items, the footage also shows Pc Roll arresting REID for being in possession of an Offensive weapon, then being escorted to the waiting transport carrier. Pc Roll's footage ends once REID is on board the carrier. Pc Roll records that REAID was subject to a full search in custody where two tubes of superglue were recovered Exhibit CJR/07 Two tubes of superglue, he further arrested REID during the custody booking in process for being in possession of articles to cause criminal damage I.E the bolt croppers and superglue. Pc Roll also further arrests for Aggravated trespass at the EXOLUM site.

The images below have been obtained from Pc Roll's BWV footage during REID's search and arrest at the EXOLUM site, and a photo taken during her custody booking in process where REID was allocated the custody reference number – 42EZ/2288/22









During the creation of this exhibit I fully reviewed the BWV footage of Ps 2796 Mint, Pc 77543 Baldwin, Pc 73309 Sharplin, Pc 78511 Roll, T/Ps 76604 Matthews, Pc 80072 Clarke, Pc 80171 Barnes, Pc 78971 Harper, Pc 71562 Worters and the Evidence Gatherer footage presented by Pc 72527 Baker. Most of

that material is not represented in this Exhibit, however none of that material I reviewed contained anything that could undermine this investigation or assist the defence at court.

## **Initial Disclosure Assessment of footage**

For disclosure I have considered whether there is any material which might reasonably be considered capable of undermining the case for the prosecution against the accused, or of assisting the case for the accused. Any material required to be supplied under paragraph 7.3 of the code.

**Supply Details:** 

Signature of reviewing officer:

c 73659 Skinner

## Time/Date of completion:

## **Check List: (tick when complete)**

- 1. Update the DS of your completion.
- 2. Notify OIC/Disclosure officer of anything evidential or meeting disclosure test
- 3. Has officer provided a statement producing footage?
- 4. Has BWV Officer Exhibited BWV correctly:
- 5. Has BWV Officer Exhibiting BWV saved footage correctly?
- 6. Ensure footage burnt to disc
- 7. Ensure exhibit is on HOLMES
- 8. Place review document into MIR Submitted for Holmes folder for registration.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

## (1) MADELINE ADAMS

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

		<b>Defendants</b>
${f E}$	XHIBIT "JS/107"	

## **OFFICIAL**

MG11 (Interactive)

Page 1 of 3

WITNESS STATEMENT Criminal Procedure Rules, r. 16.2;Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B				
ommar roccade raies, r. 10.2,0mmar dustice Act 1307, s. 5, ma	.yısı:	ates (t	Juits Act	1300, 5.35
URN				
Statement of: Liam GARLAND				
Age if under 18: Over 18 (if over 18 insert 'over 18') Occupation: Po	olice	Consta	ble 7909	0
This statement (consisting of 3 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.				
Signature: (witr	ness)	Date	: 29/08/2	022

At approximately 19:48 hours on SUNDAY 28<sup>th</sup> AUGUST 2022 I was on duty in full uniform booked on to call-sign HAZEL03 in company with SGT 77572 O'SHAUGHNESSY, DC 81307 DEVINE, PC 71835 DADY, PC 77316 COHEN, PC 78021 DEEBANK, PC 77210 BRANDON and PC 71784 OWEN. I was on a public order deployment with the role of responding to JUSTSTOPOIL protesters looking to cause disruption and criminal offences. At 19:48 hours we were responding to reports that protesters had made their way on to St CLEMENTS WAY, GRAYS where one had reportedly climbed a lorry tanker, and another had attempted to drill the back tyre to a vehicle. On arrival at the bottom of ST CLEMENTS WAY, junction with LONDON ROAD, I saw three females running into the carriageway together in a line. As the carrier stopped, officers immediately jumped out to pursue the females and the females began to sit down in a line to obstruct the highway.

Sgt O'SHAUGHNESSY and I detained one of the females, who I now know as MARGARET, taking her arms and carried her to the pavement on the side of the road. MARGARET was a white female who appeared to be aged in her fifties, with brown hair and was wearing a red jumper with a pair of glasses tucked into it. I saw that on MARGARET's right wrist there was a small metal chain with appeared to be tied around it. The female had a tube of glue in her left hand which was clenched in a fist, and she told us that her hand was stuck to the glue. Sgt O'SHAUGHNESSY informed the female that she was detained for a search under S1 of PACE and we awaited a female officer to complete the search.

Signature:	Signature witnessed by:	
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## **OFFICIAL**

MG11 (Interactive)

Page 2 of 3

The two other females obstructing the highway were carried out of the road by other officers and were also detained for a search.

At approximately 20:20 hours, DC DEVINE carried out a search of MARGARET and located another tube of glue concealed under her jumper wrapped in tissue which was then handed to me. At 20:26 hours, I arrested MARGARET on suspicion of being in possession of articles with the intent of causing criminal damage and I gave the police caution.

I seized the following items from MARGARET on arrest.

LG/01- METAL CHAIN ON WRIST

LG/02- TWO TUBES OF ULTRA GLUE

At 21:11 hours, I was informed that the two other females detained had been searched and were also in possession of articles and suspected to be intent on causing criminal damage. One of the females, who I now know as VICTORIA LINDSELL, was a white female with long blonde hair, appeared to be aged in her 60's and was wearing a grey hooded jumper. VICTORIA had in her possession a protest banner, a large metal pole and a rock. VICTORIA also had a tube of ULTRA GLUE suck in her hand in a fist.

A search of VICTORIA's rucksack was carried out by DC DEVINE in custody in which she was also found to be in possession of an orange high vis vest with the JUSTSTOPOIL logo on the back, two more tubes of ULTRA GLUE, a stop HS2 pin-badge, a JUSTSTOPOIL pin badge, a handwritten map of the bridge where the protest occurred and an ADVICE ON ARREST card. At 21:11 hours, I arrested VICTORIA and gave the police caution.

I have seized the following items from VICTORIA.

LG03- THREE TUBES OF ULTRA GLUE

LG/04- METAL POLE

LG/05- PROTEST BANNER

LG/06- HIGH-VIS JUSTSTOPOIL VEST

LG/07- HS2 PIN BADGE

LG/08- JUSTSTOPOIL PIN BADGE

LG/09- HANDWRITTEN MAP

LG/10- ADVICE ON ARREST CARD

Signature: La 1/0/0	Signature witnessed by:
teens/ early 20's. She had short pink hair	and was wearing a red hooded jumper and black
The other female, who I now know as PHO	OEBE PLUMMER, appeared to be aged in her late

2010/11	OFFICIAL

## **OFFICIAL**

MG11 (Interactive)

Page 3 of 3

boots. PHOEBE had in her possession a tube of ULTRA GLUE, a small metal chain and two CLIMATE ACTION SUPPORT PATHWAY cards.

I also arrested PHOEBE at 21:11 hours and gave the police caution.

I have seized the following items from PHOEBE.

LG/11- TUBE OF ULTRA GLUE

LG/12- SMALL METAL CHAIN

LG/13- TWO CLIMATE ACTION SUPPORT PATHWAY CARDS.

Following the arrests, I waited for the PROTEST REMOVAL TEAM to arrive and de-bond the two protesters glued hands before conveying the three protesters to GRAYS custody, arriving at 22:05 hours, where their detention was authorised by the Custody Sergeant.

In relation to my attendance and the arrests, I am exhibiting my body worn video as LG/13. These are my original notes recorded at GRAYS POLICE STATION at 00:52 hours.

A 19090

Signature: Signature witnessed by:

2040/44

AFEIAIA1

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

## (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
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(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/108"	

# Phoebe Plummer 26/09/2001

Address - I

Contact Details - None Provided.



42/MR/17897/22 Having article to destroy / damage property.

Circumstances of this investigation are PLUMMER has been detained by Police at 21:11 hours on the 28<sup>th</sup> August 2022 at St Clements Way, Grays, Essex. On the 28th August 2022 Police were on scene at St Clements Way dealing with an ongoing Just Stop Oil protest, while dealing with that protest officers have seen PLUMMER running towards a fuel tanker. Officers have given chase and PLUMMER has stopped and sat in the carriageway, PLUMMER was detained and lifted out of the road immediately. PLUMMER was searched and found to be in possession of Super glue.

Arresting officer Pc 79090 Garland, Arrest MG11 attached.







Result – No Further Action.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

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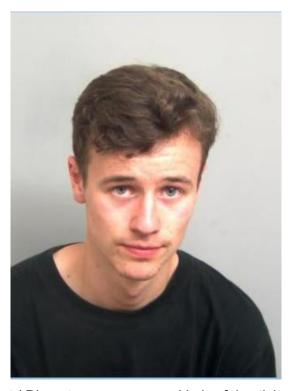
(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

		<b>Defendants</b>
į		
	EXHIBIT "JS/109"	

### Sam Parry Holland 06/05/2002

Address - I

Contact Details - None Provided.



42/MR/17715/22 Obstruct / Disrupt person engaged in lawful activity.

Circumstances of this investigation are HOLLAND has been detained by Police at 07:35 hours on the 23rd of august 2022 at Exolum Fuel Storage site, Askews Farm, Lane, Gray. Essex. At approximately 06:00 hours on the 23rd August HOLLAND and five other Just Stop Oil Direct action protesters gained entry to the secure refuelling compound located within the Exloum fuel storage site. On gaining entry HOLLAND was challenged by staff but refused to leave, he then climbed a storage silo trying to reach top, HOLLAND was blocked by a site security officer. HOLLAND clung to the ladder on the side of the silo forcing the plant to halt all activity. Police and site staff negotiated with HOLLAND for an hour and a half working to remove HOLLAND from the silo. This protest prevented the Exolum site from performing normal activity for over 10 hours.

Arresting officer Pc 71562 Worters, Arrest MG11 attached.

Evidential Media Form completed by Pc 73659 Skinner, Exhibit JLS/BWV/H2/01 attached.

Police Case material report to CPS MG5 has been attached detailing the particulars of the criminal case.

Result – Community Order 40 hours unpaid work, £200 Costs, £114 Surcharge.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/110"	

### **OFFICIAL**

Page 1 of 2			
WITNESS STATEMENT Criminal Procedure Rules, r. 16.2;Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B			
orminar recodule reales, ir real, orminar successories real, or or inagion access courte real reals			
URN			
Statement of: Thomas William WORTERS			
Age if under 18: Over 18 (if over 18 insert 'over 18') Occupation: Police Constable 71562			
This statement (consisting of page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.			
Signature: (witness) Date: Tue 23rs Aug 2022			
On Tuesday 23 <sup>rd</sup> August 2022 I was on duty in full uniform allocated to call-sign VG1B driving a marked Police Carrier. I was specifically tasked with Policing protests from the group known as "Just Stop Oil"			

At this time I was in the Grays area of Essex with several other officers. We were asked to make our way to the Shell Fuel depot, Askews farm Lane, Chafford Hundred.

This is a large fuel depot I was aware protesters had targeted before. Information given was that 15 to 20 protesters had been seen entering the site via unknown means.

Upon arrival at around 0700 hrs I activated my body worn video camera. I could see that there was a male at the top of a fixed ladder around 15 feet up. This was attached to a fuel tanker. Also with were site security trying to convince him to get down. I also saw at least 4 other protesters within some large pipes around 20 feet above the ground. I was immediately concerned for them as they were climbing around. It was clear that their presence had halted the business from running at all. Around half an hour later I noticed the first male I had seen with security was coming back down. At 0735 I arrested the male for aggravated trespass. I then cautioned him to which he made no reply. I then handcuffed him to the front stack position

, ,	back down. At 0735 I arrested the male for ag sich he made no reply. I then handcuffed him to	
then cautioned film to wi	iich he made no reply. I then handculled him to	the nont stack position.
Signature:	Signature witnessed by:	
16/08/17	OFFICIAL	

OF	FI	CI	AL
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MG11 (Interactive)

Page 2 of 2

I then searched the male. I found in his trouser pocket a tube of superglue which I seized and can produce as follows:

TWW/02 – Tube of unopened superglue

The male was then conveyed to Colchester custody where his detention was authorised. This generated the unique custody number 432EZ/2289/22

The male was identified as HOLLAND, Sam (b-06/05/2002)

I can produce my body worn video footage as exhibit TWW/01.

TWW/02 was later booked onto the Essex Police Property system under the reference ED/030273/22

Signature:	Signature witnessed by:

2010/11

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

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- (2) ESSEX COUNTY COUNCIL

**Claimants** 

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/111"	

### Evidential Media Form - JLS/BWV/H2/01 - Sam HOLLAND

Reviewing Officer Name: Pc 73659 Skinner

Review date: 27/09/2022

Review time start: 11:00 - 27/09/2022 Review time finish: 11:25 - 05/10/2022

This form has been generated from the viewing of officers Body Worn Video.

This form has been generated to show the scene at EXOLUM fuel storage site, Askews Farm Lane, Thurrock, Essex and the actions of the Just Stop Oil protesters involved.

To show continuity at the beginning of every media source used you will see the below – this is to ensure you as the reader can understand what the media is, who it is from, the date and duration. This will then show how the timeline has been formed and via what media source.

If yes how long?

Source: BWV / Evidence gatherer footage / Custody image.

**BWV Clip Number:** 

Officer name (BWV/Evidence gatherer user):

Date Shown on footage: Axon Platform start time: Start time Shown on Footage: Real time (if different GMT):

Is there a delay in audio starting? Y/N

Duration of footage:

Duration of footage viewed from: Duration of footage viewed to:

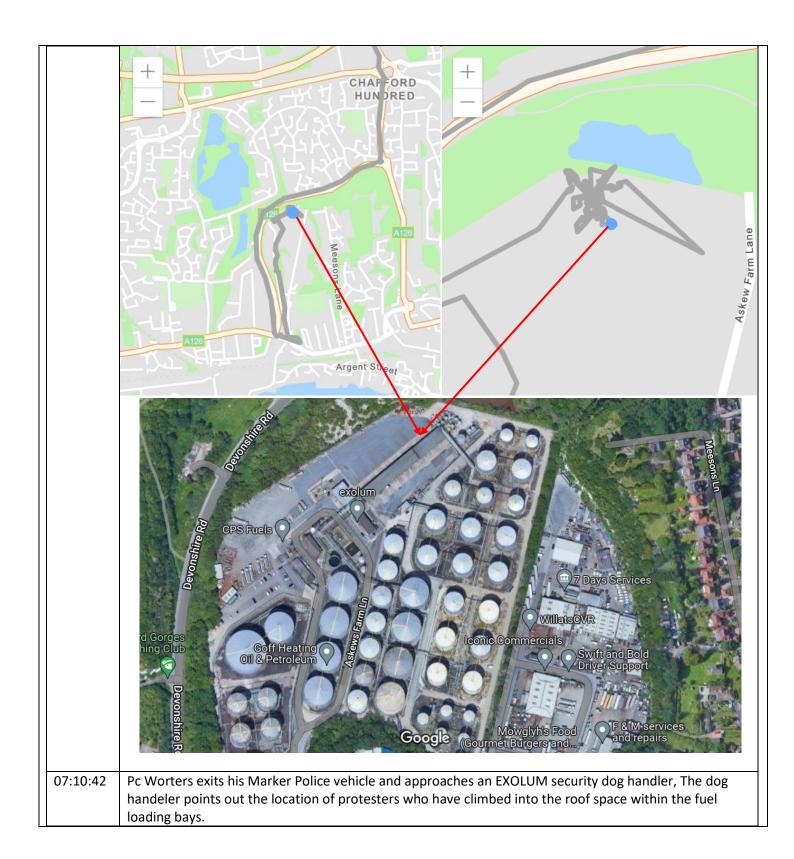
AXON BWV Reference (8 digits): Holmes Exhibit ref:

Officer Exhibit Ref:

Summary (Must have sufficient details to satisfy a review under provisions of CPIA)

Consider screen captures and direct speech and include counter times.

Summary				
		nignlight any informa	tion requiring redacting/editing	
Source: BWV				
BWV Clip Number: Whole footage				
Date Shown on footage: 23/08/2022	Axon Platform start time: 07:10			
Start time Shown on Footage: 07:10:28	Real time (if different GMT): N/A			
Is there a delay in audio starting? Yes	If yes how long? 59 Seconds			
Duration of footage: 1:45:04				
Duration of footage viewed from: Start	Duration of footage viewed to: Finish			
AXON BWV Reference (8 digits): X60418537	Holmes Exhibit ref:			
Officer Exhibit Ref: TWW/01				
O7:10:42  Pc 71562 Worters is the driver of a carrier that has been allocated to deal with the protesters who have gained unlawful access to the EXOLUM fuel storage site. Pc Worters and his passengers arrive in the carpark area in front of the fuel loading bays within the EXOLUM complex. Pc Worters BWV GPS Location Map shows his location within the complex. A Google maps image shows an aerial view of the location.				
			Time (NOT counter time)  Source: BWV BWV Clip Number: Whole footage Officer name (BWV/Evidence gatherer user): Pc 71562 Worters Date Shown on footage: 23/08/2022 Axon Platform start time: 07:10 Start time Shown on Footage: 07:10:28 Real time (if different GMT): N/A Is there a delay in audio starting? Yes If yes how long? 59 Seconds Duration of footage viewed from: Start Duration of footage viewed to: Finish AXON BWV Reference (8 digits): X60418537 Holmes Exhibit ref: Officer Exhibit Ref: TWW/01  O7:10:42 Pc 71562 Worters is the driver of a carrier that has been allocated to deal with the protesters who gained unlawful access to the EXOLUM fuel storage site. Pc Worters and his passengers arrive in to carpark area in front of the fuel loading bays within the EXOLUM complex. Pc Worters BWV GPS	





O7:11:10 Pc Worters enters the fuel loading bays with Pc 73309 Sharplin and identifies where protesters are in the roof space. Due to the darkness in the roof space, Pc Worters BWV does not capture any images of the persons in the roof space. Pc Worters walks the length of the loading bays and counts off four protesters within the roof space.



07:16:49 While standing at his post by the fuel loading bays Pc Worters BWV captures a fifth protester (HOLLAND circled in Blue) standing on the ladder of a cylinder close to the fuel pumping bay. Site security are with the protester indicated by Orange arrows.





O7:25:32 Pc Worters BWV captures Pc 73309 Sharplin appealing for the protesters in the roof space to not move around as he is not sure how secure the pipes are, Pc Sharplin also makes a request for them to come down. When this appeal is rejected Pc Worters informs the protesters in the roof space that they are likely to be arrested for aggravated trespass if they fail to come down. None of the protesters comply with the request.



O7:35:56 Pc Worters is informed that a proterster (HOLLAND) is climing down from the ladder on the cylinder, Pc Worters and Pc 77543 Baldwin walk over to towards the cylinder. HOLLAND is escorted out of the area containing the cylinder by site security.



07:36:50 HOLLAND is escorted to Pc Worters by two members of site security, they are holding both of HOLLANDS arms, HOLLAND does not appear to be offering any resistance.



O7:36:52 Pc Worters approached HOLLAND and askes if he has any injuries, HOLLAND confirms he is uninjured. Pc Worters then arrests HOLLAND for Aggravated trespass at 07:36:54, HOLLAND is cautioned and cuffed in a front stack possition. Following the caution Pc Worters asks HOLLAND if he has anything on him, HOLLAND replied "NO". HOLLAND then informes the site security that his back pack is still in the area near the cylinder. Site Security go to retieve the backpack. Site Security are unalble to locate the pack near the cylinder, HOLLAND makes frequent requests for his pack while at the EXOLUM site.



O7:37:21 Pc Worters informs HOLLAND that he will be subject to a search, Pc Worters asks if HOLLAND has anything on him that can hurt him, HOLLAND informs Pc Worters that he has glue in a pocket. Pc Worters seizes the glue and hands it to Pc Baldwin while he continues his search. Pc Worters would later exhibit this glue as Exhibit TWW/02 Tube of unopened superglue.



O7:39:42 Pc Worters completes his search of HOLLAND, no other items are seized from HOLLAND at this point. HOLLAND is escorted by Pc Worters and Pc Baldwin to the Police carrier.



07:40:12 HOLLAND is placed into the Police Carrier and is secured in the rear prisoner holding cell, HOLLAND makes further mention of his back pack and informs Pc Worters that he would like books from that bag.



07:40:39 HOLLAND sits on the Cell bench while Pc Worters closes the cell door, Pc Worters then remains outside the cell maintaing observation on HOLLAND through the plexiglass on the cell door.



O7:54:17 Pc Worters is still maintaing observation of HOLLAND, Pc Worters opens the cell door and informs HOLLAND that he does not know how long they will be waiting so will take off HOLLAND's cuff, Pc Worters requests that HOLLAND does not put his hands in his pockets. Pc Worters remains with HOLLAND until 08:22:16 when another officer is allocated to assist Pc Worters in conveying HOLLAND to custody. At 08:23:40 Pc Worters begins his conveyance of HOLLAND to Colechester Custody. Pc Worters BWV runs until 08:54:33 when it is deactivated part way through the journey to Custody.



Source: BWV

BWV Clip Number: Whole Footage Officer name (BWV): Pc 2796 Mint Date Shown on footage: 23/08/2022 Start time Shown on Footage: 07:06:17 Is there a delay in audio starting? Yes

Duration of footage: 15:55

Duration of footage viewed from: Start

AXON BWV Reference (8 digits): X60419962

Officer Exhibit Ref: JDM/01

Axon Platform start time: 07:07 Real time (if different GMT): N/A If yes how long? 59 Seconds

Duration of footage viewed to: Finish

Holmes Exhibit ref:

07:11:08

Ps Mint locates site security within the EXOLUM complex and identifies where the protesters have gained access to the site. Ps Mint moves to that location which is now being guarded by a site dog handler, laying on the floor is a section of blue carpet (Circled in white) and a telescopic ladder, the dog handler explains they were used to cover the barbed wire and to scale the fencing in order to gain entry to the site. The location of the fume cylinders that HOLLAND has attempted to scale are shown in image two (Circled in white)





Source: BWV

BWV Clip Number: Whole Footage

Officer name (BWV/Evidence gatherer user): Pc 73309 Sharplin

Date Shown on footage: 23/08/2022 Axon Platform start time: 07:15
Start time Shown on Footage: 07:14:19 Real time (if different GMT): N/A
Is there a delay in audio starting? Yes If yes how long? 59 Seconds

Duration of footage: 21:30

Duration of footage viewed from: Start

AXON BWV Reference (8 digits): X60418422 Holmes Exhibit ref:

Officer Exhibit Ref: IS/01

07:18:35 Pc 73309 Sharplin is nominated by Ps 2796 Mint as the officer to accompany the representative from the EXOLUM site. He and Nick are to make the appeals for all protesters to leave the site. EXOLUM site rep Nick is circled in white. Pc Sharplin receives a short briefing on the five step appeal from Ps Mint.

Duration of footage viewed to: Finish



### 07:23:23

Pc Sharplin and the site rep Nick approach the cylinder area where HOLLAND (circled in Orange) is standing part way up the ladder leading to the top of the cylinder. Nick Has identified this area as a highrisk area as it deals with the flammable fumes from the Hydrocarbons that the site store. Nick calls out the HOLLAND who turns his head to listen to Nick, Nick informs HOLLAND that he is trespassing, he informs HOLLAND of the dangers his presence possess in that area due to the flammable atmospheres present at that location, Nick requests HOLLNAD comes down and leaves the area. Once Nick has made his appeal Pc Sharplin then makes his appeal for HOLLAND to come down from the ladder, he reiterates the danger that HOLLAND is in and informs him he will be arrested for aggravated trespass. HOLLAND does not comply with either request to leave his present location.



BWV Clip Number: 00006

Officer name (BWV/Evidence gatherer user): Pc 72527 Baker

Date Shown on footage: 23/08/2022 (Verbal) Axon Platform start time: N/A Start time Shown on Footage: 07:21 (Verbal) Real time (if different GMT): N/A

Is there a delay in audio starting? No

Duration of footage: 00:35

Duration of footage viewed from: Start AXON BWV Reference (8 digits): N/A

Officer Exhibit Ref: KB/01A Disk 1

If yes how long? N/A

Duration of footage viewed to: Finish

Holmes Exhibit ref:

07:21

Pc 72527 Baker (Evidence Gatherer) records protesters at the EXOLUM fuel storage site, Askews farm lane, Grays, Essex. Pc Baker records HOLLAND standing on the ladder attached to the side of a cylinder close to the fuel pumping bays.





BWV Clip Number: 00007

Officer name (BWV/Evidence gatherer user): Pc 72527 Baker

Date Shown on footage: 23/08/2022 (Verbal) Axon Platform start time: N/A Start time Shown on Footage: 07:23 (Verbal) Real time (if different GMT): N/A Is there a delay in audio starting? No If yes how long? N/A

Duration of footage: 01:23

Duration of footage viewed from: Start AXON BWV Reference (8 digits): N/A

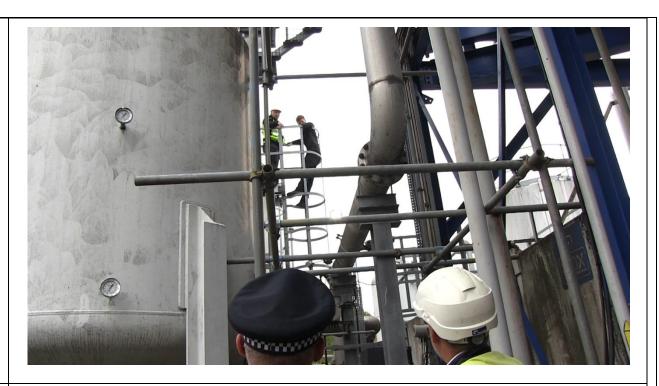
Officer Exhibit Ref: KB/01A Disk 1

Duration of footage viewed to: Finish

Holmes Exhibit ref:

07:23 Pc 72527 Baker records HOLLAND while he is being informed by the site representative and Police that he is trespassing and is required to leave. Pc Baker describes HOLLAND as "A male all in black clothing

and has black shoes or trainers on"





The images above show HOLLAND at the EXOLUM fuel storage site on the 23<sup>rd</sup> August 2022, HALLOAND has gained unlawful access to the site and has been requested to leave by both site staff and Police but has refused. The footage shows HOLLAND part way up a ladder trying to reach the top of a storage cylinder near to the fuel pumping bays where four other protesters have secreted themselves in the roof space. HOLLAND has failed to reach the top of the cylinder as he has been blocked by site security. The footage shows HOLLAND being informed by site staff and Police that he is trespassing. It also shows HOLLAND being escorted from the cylinder by site security, his interaction with Pc Worters who arrests HOLLAND for aggravated trespass. The footage also shows HOLLAND being searched by Pc Worters where superglue is located, and then being escorted to the waiting transport carrier.

The images below have been obtained from Pc Worters BWV footage during HOLLANDS arrest at the EXOLUM site, and a photo taken during his custody booking in process where HOLLAND was allocated the custody reference number – 42EZ/2289/22



During the creation of this exhibit I fully reviewed the BWV footage of Ps 2796 Mint, Pc 77543 Baldwin, Pc 73309 Sharplin, Pc 78511 Roll and Pc 71562 Worters. Most of that material is not represented in this Exhibit, however none of that material I reviewed contained anything that could undermine this investigation or assist the defence at court.

### **Initial Disclosure Assessment of footage**

For disclosure I have considered whether there is any material which might reasonably be considered capable of undermining the case for the prosecution against the accused, or of assisting the case for the accused. Any material required to be supplied under paragraph 7.3 of the code.

Supply Details:

Signature of reviewing officer:

Pc 73659 Skinner

Time/Date of completion: 11:25 - 05/10/2022

### **Check List: (tick when complete)**

- 1. Update the DS of your completion.
- 2. Notify OIC/Disclosure officer of anything evidential or meeting disclosure test
- 3. Has officer provided a statement producing footage?
- 4. Has BWV Officer Exhibited BWV correctly:
- 5. Has BWV Officer Exhibiting BWV saved footage correctly?
- 6. Ensure footage burnt to disc
- 7. Ensure exhibit is on HOLMES
- 8. Place review document into MIR Submitted for Holmes folder for registration.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

### (1) MADELINE ADAMS

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(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/112"	

### Samuel Johnson 22/04/1983

Address – I

Contact Details – None provided.



42/MR/17877/22 intentionally / recklessly cause a public nuisance.

Circumstances of this investigation are JOHNSON has been detained by Police at 15:44 hours on the 4th September 2022 on St Clements Way, Grays, Essex. On the morning of the 23rd August 2022 JOHNSON and five other Just Stop Oil direct action protesters occupied two pre-excavated tunnels. One on St Clements way and the other on Stoneness Road. JOHNSON and two others occupied Tunnel 1 on St Clements Way, the tunnels were constructed in a way that the entire road had to be closed initially preventing all vehicular traffic entering the industrial estate that could only be accessed by these two roads. St Clements way was partly opened to a limited amount of traffic controlled by temporary traffic light contraflow system. Police negotiators worked for 12 days to encourage the group to leave without success. JOHNSON was arrested on the 4th September when negotiations succeeded and JOHNSON left the tunnel he had occupied.

Arresting officer Pc 78024 Green, Arrest MG11 Attached.

Police Case material report to CPS MG5 has been attached detailing the particulars of the criminal case.

Video Compilation exhibit JLS/VC/04 attached (In Joe HOWLETT Folder).

Result – Guilty verdict at Crown Court sentencing has not been completed at this time.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<u>Defendants</u>
EXHI	BIT "JS/113"

Page 1 of 3

WITNESS STATEMENT Criminal Procedure Rules, r 27. 2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B			
URN			
Statement of: Stevie GREEN			
Age if under 18: Over 18 (if over 18 insert 'over 18') Occupation: Police Constable 78024			
This statement (consisting of 3 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.  Signature: (witness) Date: 04/09/2022			

On SUNDAY 04<sup>TH</sup> SEPTEMBER 2022 I was on duty in full uniform attached the call sign VG2A. On this call sign I was in company with PS 72436 WIGINGTON, PC 2981 PADDON, PC 451 CORNWELL, PC 77189 READ, PC 79836 YUILL, PC 73217 PHILIPSEN and PC 80072 CLARKE.

On this date we were deployed to ST CLEMENT'S WAY, GRAYS, THURROCK whereby three protesters were within a manmade tunnel which is suspected to have been dug by the protesters in the hole. The tunnel entrance was on the grass verge beyond the railings, whereby the tunnel length continued underneath the road surface of ST CLEMENTS WAY. The protesters within the hole is suspected to have drilled through the road surface creating holes. As a result the whole road had been closed off and cordoned by Police, which has caused huge disruption by vehicles not being able to use the road for its purpose. This location is referred to as site number TUNNEL 1.

These protesters within the tunnel are part of the group 'JUST STOP OIL'. The protests relate to the oil refinery protests that have been occurring within the THURROCK area which is in ESSEX. These protests have been occurring since April 2022. These protests have consisted of individuals commandeering fuel tankers by sitting on top of them and attaching themselves to the gates of oil refinery premises. Our intention is to prevent these protests from occurring

Signature: Signature witnessed by N.J.A.

RESTRICTED (when complete)

2010/11

### RESTRICTED (when complete)

MG11 (Interactive)

Page 2 of 3

which has been causing a significant nuisance to the public, businesses and exhausting emergency services demand.

We arrived at ST CLEMENTS WAY at approximately 1600hrs, whereby we had a briefing from INSP 73253 COYLES who advised that Police negotiators had communicated with the protesters within the tunnel and the subjects agreed to leave the hole with terms that their press officer was present. These terms had been agreed and myself, PC CORNWELL, and PC PADDON had were tasked with effecting the arrest of the three individuals on suspicion of criminal damage and intentionally/recklessly cause a public nuisance.

At 1540hrs we positioned ourselves around the tunnel entrance to intercept the subjects when exiting the tunnel. The Police negotiators were assisting them removing their belongings out of the tunnel.

I activated my body worn video which I can produce as my exhibit SG/01.

I had begun to arrest SAM JOHNSON who was the first protester to exit the tunnel, although whilst doing so, he started shouting and putting his fist into the air to the photographer, this distracted me stopping me mid arrest. I do not recall the words he was saying.

Once he stopped shouting and pandering to the photographer, at 1544hrs I placed JOHNSON under arrest for CRIMINAL DAMAGE TO THE ROAD AND INTENTIONALLY/RECKLESLY CAUSING A PUBLIC NUISANCE. I cautioned him by saying YOU DO NOT HAVE TO SAY ANYTHING, BUT IT MAY HARM YOUR DEFENCE WHEN YOU DO NOT MENTION WHEN QUESTIONED SOMETHING WHICH YOU RELY ON IN COURT, ANYTHING YOU DO SAY MAY BE GIVEN IN EVIDENCE. I provided the necessity criteria of his arrest to prevent any further damage taking place, and prompt and effective investigation by means of questioning.

I wanted to ensure he was listening to the grounds and necessity for his arrest clearly and that there was no confusion as to what I had originally started to say, hence why I chose to stop and wait until he stopped shouting. He was placed in handcuffs to the rear to prevent his escape and I wanted to ensure he was searched in case he had articles on his person that may cause further damage such as superglue.

Signature: .....

Signature witnessed by: MA

RESTRICTED (when complete)

2010/11

Page 3 of 3

I would describe JOHNSON as a white male, 5ft11 in height, roughly 40 years old, black short hair, black beard, and of slim build. He was wearing an orange t-shirt with JUST STOP OIL written on the front in bold black text, grey cargo trousers and dark walking boots.

JOHNSON stated his legs were unsteady, therefore we slowly walked up the verge whereby PC PHILLIPSEN met me assisting. JOHNSON was walked over to the paramedic van whereby PC PHILLIPSEN conducted a search after arrest, his handcuffs were changed to the front stack position. He was medically checked by the paramedic and JOHNSON said he felt fit and well.

He was placed in the rear of the Police vehicle where he was conveyed to GRAYS CUSTODY by PC PHILLIPSEN and I. He was calm and compliant throughout.

We arrived at GRAYS custody at 1604hrs whereby his detention was authorised by the custody sergeant. His custody reference was 42BZ/2596/22.

I have not reviewed my body worn video prior to making this statement and it is all from my own memory.

These are my original notes made at GRAYS POLICE STATION, concluded at 1730hrs.

RESTRICTED (when complete)

Signature: .

2010/11

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/114"	

Address –

Contact Details – None Provided.

42/MZ/18706/22 Obstruct / Disrupt person engaging in lawful activity.

Circumstances of this investigation are DAVIES has been detained by Police at 06:56 on the 24 th August 2022 at the MOTO service, Junction 31, M25, Grays, Essex. At approximately 05:30 hours on the 24th August DAVIES arrives at the MOTO services along with ten other Just Stop Oil direct action protesters. On arrival the group including DAVIES block the entrance to the services by sitting across the road. While at that location two of that group leave the protest line and cause over £11000 in damage to the fuel pumps. Due to the protesters blocking the road and the damage to the pumps these services was unable to reopen until approximately 18:00 hundred hours that evening.

Arresting Officer Pc 78024 Green, Arrest MG11 attached.

Photo of protesters taken just prior to arrest, exhibit CW/02 attached.

Police Case material report to CPS MG5 has been attached detailing the particulars of the criminal case.

Result – Fine £250, Costs £620, £100 Surcharge

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

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(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<u>Defendan</u>	<u>ts</u>
EXHIBIT "JS/115"		

Page 1 of 5

WITNESS STATEMENT Criminal Procedure Rules, r 27. 2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B		
URN		
Statement of: Stevie May GREEN		
Age if under 18: Over 18 (if over 18 insert 'over 18') Occupation: Police Constable 78024		
This statement (consisting of 5 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.		
Signature: (witness) Date: 24/08/2022		

On WEDNESDAY 24<sup>TH</sup> AUGUST 2022 I was on duty in full uniform using the call sign VG1A. I was in company with PS 74352 BAKER, PC 77725 DEDMAN, PC 77723 HANBURY and PC 75271 WINNEY.

At 0600hrs we were deployed to ESSO GARAGE, MOTO SERVICES, WEST THURROCK, ESSEX whereby it was reported that protestors had caused damage to the petrol pumps by smashing them with glass hammers and spray painted display screens on the pumps, as result this damage rendered them useless for operational working until they were fixed. Essex Police reference EP-20220824-0195 refers. This location does not have a designated operation site number.

The protest relates to the oil refinery protests that have been occurring within the THURROCK area which is in ESSEX. These protests have been occurring since April 2022. These protests have consisted of individuals commandeering fuel tankers by sitting on top of them and attaching themselves to the gates of oil refinery premises. Our intention is to prevent these protests from occurring which has been causing a significant nuisance to the public, businesses and exhausting emergency services demand.

We arrived at the subject location at approximately 0630hrs whereby there were 11 protesters at the entrance to the fuel station sat on the floor. The majority of the protesters were wearing

Signature: 78024	Signature witnessed by:

**RESTRICTED** (when complete)

2010/11

Page 2 of 5

'JUST STOP OIL' orange tabards and 'JUST STOP OIL' banners displayed in front of them where they were sat.

On arrival I activated my Body Worn Video which I can produce as my exhibit SG/01- Reference X6041067.

I took an image of the protesters whilst they were sat on the floor which I can produce as my exhibit SG/02.

I can also produce the same image as SG/03. Although on this image I have edited and placed text boxes above the protesters identifying who is who.

At approximately 0655hrs PS BAKER briefed us of the circumstances of the alleged offence and advised that I will be arresting the individuals. This information had come from A/INSP BINGHAM who had liaised with staff at the fuel station. As such, at 0656hrs I arrested all 11 individuals on suspicion of criminal damage whereby I stated the 'WHEN CAUTION' and provided the necessity criteria of prompt and effective investigation by means of questioning and to prevent any further damage taking place. None of the individuals replied to caution. They were arrested at the site entrance of the fuel station.

I began conducting Section PACE searches of the females that had been arrested to ensure they had no items on their person which may cause further offences or harm myself, or my colleagues during conveyance. Other male officers conducted searches of the males that were arrested. No force was used on any of the individuals arrested.

I am now going to details the 11 persons arrested, I am going to describe the female suspects arrested first:

- Female protester number 1- I would describe as a white female, approximately early 70s, medium build, 5ft7 in height, grey medium length hair. She was wearing an orange tabard navy t-shirt, blue jeans, and pink sandals. I searched this female and documented in my Body Worn verbally "FEMALE PROTESTER NUMBER 1". A bank card was on her person which identified her as JOY. I later discovered that her name was JOY CORRIGAN. Basildon custody reference- 42BY/2722/22.

Signature:	Signature witnessed by:
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Page 3 of 5

- Female protester number 2- I would describe her as a white female, approximately mid 60s, slim build, 5ft6 in height, glasses and shoulder length brown hair. She was wearing orange tabard, green/brown long sleeved top, black trousers, and dark shoes. I searched this female and documented in my Body Worn verbally "FEMALE PROTESTER NUMBER 2". I later discovered that her name was ANNE HART. Basildon Custody Reference- 42BY/2724/22.
- Female protester number 3- I would describe her as a white female, aged approximately early 50s, medium length grey/blonde shoulder length hair which was scraped back with a headband and of medium build. She was wearing long sleeved light blue top and grey trousers, black trainers with pink socks I searched this female and documented in my Body Worn verbally "FEMALE PROTESTER NUMBER 3". She was not booked into custody by the time of completing this statement, there I do not know her name or Grays custody reference.
- Female protester number 4- I would describe her a white female, approximately early 70s, 5ft3" in height, short grey hair and of slim build. She was wearing a black and grey striped top and over the top of this she was wearing a black fleece. She was also wearing black cargo trousers and an orange tabard. I searched this female and documented in my Body Worn verbally "FEMALE PROTESTER NUMBER 4". I later discovered her name was RUTH COOK. Grays custody reference- 42BZ/2482/22.
- Female protester number 5- I would describe her as a white female, approximately mid 20s, 5ft6" in height, slim build, and long black hair which was tied into a pony tail and she had a block fringe. She was wearing a blue jumper with print on the front, black crago trousers and wearing an orange tabard. I searched this female and documented in my Body Worn verbally "FEMALE PROTESTER NUMBER 5". She was not booked into custody by the time of completing this statement, there I do not know her name or Grays custody reference.
- Female protester number 6- I would describe her as a white female, aged approximately mid 20s, 5ft8" in height, slim build and brown hair tied in a pony tail. She was wearing a royal blue fleece, black gym leggings and trainers. I searched this female and documented in my Body Worn verbally "FEMALE PROTESTER NUMBER 6". She was not booked into custody by the time of completing this statement, there I do not know her name or Grays custody reference.

Signature:	Signature witnessed by:
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I will now begin to describe the male suspects arrested:

- Male protester number 1- I would describe as an IC1 male, late 60s, 6ft in height grey hair and balding on top and medium build. He was wearing a navy long sleeved top, jeans and grey trainers. I later discovered his name was LINDSEY HART. Basildon Custody Reference- 42BY/2725/22.
- Male protester number 2- I would describe as a white male, approximately early 70s, , grey shoulder length hair, clean shaven and slim build. He was wearing an orange tabard, black long-sleeved top. I later discovered his name was GEORGE OAKENFOLD.
   Basildon custody reference 42BY/2723/22.
- Male protester number 3- I would describe as a white male, early 30s, brown short hair, dark stubble, and slim build. He was wearing an orange tabard, green long-sleeved top, navy trousers and black shoes. I later discovered his name was PATRICK HART. He was not booked into Grays custody by the time of completing this statement, there I do not have a reference number.
- Male protester number 4- I would describe him as a white male, approximately early 50s, medium build and clean shaven. He was wearing a white t-shirt. He was not booked into custody by the time of completing this statement, there I do not know his name or Grays custody reference number.
- Male protester number 5- I would describe him as a white male, approximately mid 50s, medium build, glasses, and white hair balding on top. He was wearing an orange tabard, navy t-shirt, and cream trousers. He was not booked into custody by the time of completing this statement, there I do not know his name or Basildon custody reference number.

They were placed into carriers and conveyed to custody. Next to their names above I have listed what custody they were conveyed to and their relating custody reference.

I was in a carrier with the individuals conveyed to BASILDON CUSTODY whereby they were compliant throughout and did not pose any issues. No significant statements were made throughout. I conveyed with officers PC 76177 MADDISON, PC DEDMAN, PC WINNEY, and PS BAKER. We arrived at custody at 0743hrs. I de activated my body worn video on arrival to BASILDON CUSTODY.

Signature:	Signature witnessed by:
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#### **RESTRICTED** (when complete)

MG11 (Interactive)

Page 5 of 5

I have reviewed my body worn video prior to making this statement.

These are my original notes made at BASILDON POLICE STATION concluded at 0945 hrs.

78024

Signature: Signature witnessed by:

**RESTRICTED** (when complete)

2010/11

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

#### (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
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- (226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<u>Defendants</u>
EXHIBIT "JS/116"	



Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

#### (1) MADELINE ADAMS

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

		<b>Defendants</b>
EXHIBIT "JS/117"		

### Simon Reding 04/10/1972

Address - I

Contact Details - None Provided.



42/MR/18216/21 Wilful obstruction of the highway.

Circumstances of this investigation are REDING has been detained by Police at 08:24 hours on the 30<sup>th</sup> September 2021 at Junction 30, Mar Dyke, M25, Grays, Essex. At approximately 08:10 hours on the 30<sup>th</sup> September REDING attended a section of the M25 motorway located at junction 30. REDING and eight other Insulate Britian Protesters blocked this section of the Motorway by gluing themselves to the road surface and each other.

Arresting Officer Pc 75387 Orenellas, Arrest MG11 attached.

Police Case material report to CPS MG5 has been attached detailing the particulars of the criminal case.











Pc 73908 Al-Rawi captures BWV footage of the protesters, Still images attached.



Custody Photo obtained following arrest.

Result – £200 Fine, Costs, £34 Surcharge.

42/MR/19410/21 Wilful obstruction of the highway.

Circumstances of this investigation are REDING has been detained by Police at 10:02 hours on the 13<sup>th</sup> October 2021 at St Clements Way, Grays, Essex. At Approximately 08:30 hours Essex Police receive calls stating Protesters are at this location and are blocking traffic, on arrival Police located 19 Insulate Britan protesters. The protesters were in two groups blocking the road in both directions and preventing all vehicular access to St Clements Way. Some of the protesters had glued themselves to the road surface hindering their removal.

Arresting Officer Pc 3449 Clinton, Arrest MG11 Attached.

Police Case material report to CPS MG5 has been attached detailing the particulars of the criminal case.

Results Fine £180, £85 Costs, £34 Surcharge.

42/MR/17714/22 Wilful obstruction of the highway.

Circumstances of this investigation are REDING has been detained by Police at 06:37 hours on the 28<sup>th</sup> September 2022 at St Clements Way, Grays, Essex. At Approximately 06:00 hours Essex Police receive calls stating Protesters are at this location and are blocking traffic, on arrival Police located 19 Insulate Britan protesters. The protesters were in two groups blocking the road in both directions and preventing all vehicular access to St Clements Way. Some of the protesters had glued themselves to the road surface hindering their removal.

Arresting Officer Pc 75271 Winney, Arrest MG11 Attached.

Police Case material report to CPS MG5 has been attached detailing the particulars of the criminal case.

Results Discontinued at court.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

#### (1) MADELINE ADAMS

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

		<b>Defendants</b>
EXHIBIT "JS/118"		

#### **OFFICIAL**

MG11 (Interactive)

Page 1 of 3

WITNESS STATEMENT		
Criminal Procedure Rules, r. 16.2;Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B		
URN		
Statement of: Michael ORNELLAS		
Age if under 18: Over 18 (if over 18 insert 'over 18') Occupation: Police Constable 75387		
This statement (consisting of 3 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.		
Signature: MC MCCles 15357. (witness) Date: 30/09/2021		

On THURSDAY the 30<sup>TH</sup> of SEPTEMBER 2021 at 0815 Hours I was on duty in police uniform in company with PC'S 76490 WILLIS, 73908 AL-RAWI, 78998 CAREY-SMITH, 11829 WALSHAM, 77866 HESKETH, 79046 CRONEY and PS 3393 RICHMOND, call sign VG01B travelling along the M25 anticlockwise.

I left at junction 30 and travelled along the off-slip, as I did I saw out the of the windows a number of persons sat in the middle of the carriageway holding up traffic, I saw a number of them were wearing orange tabards. I could also hear several motorists sounding their horns. Our unit travelled around the roundabout and I alighted from our carrier and walked along the carriageway towards the persons I had seen, this was because our carrier could not get past the traffic. As I was walking I could see that the traffic was at a standstill, I could hear a number of motorists sounding their horn and as I got closer I could see what I believed to be other motorists who had gotten out of the vehicles confronting the persons sat in the road. As I got to the persons sat in the road, I could see that some were holding up red, white and blue banners which had 'INSULATE BRITAIN' in capital letters on them. In company with other officers from my carrier I started to verbally engage with the persons sat in the road, I saw a group of three who were sat on the floor who said that they were glued. As I looked I could see that they were glued together and one of them was glued to the road, as other officers arrived I then went over to another female who was sat on her own, I told her that she needed to get out of the road and

Signature: MMMLL@07587-	Signature witnessed b	р <b>у</b> :
16/08/17	OFFICIAL	

#### **OFFICIAL**

MG11 (Interactive)

Page 2 of 3

asked if she would, without any resistance the female got up and out of the road and was left with another officer.

I then went over to two males who were sitting in the road, both males where holding an 'INSULATE BRITAIN' banner in front of them. I asked them to get up and out of the road, they remained silent so I and other officers lifted them up and moved them to the side of the road, I could see that the two males had glued their hands together which they told me about prior to moving them. I now know these two males to be Ben TAYLOR and Simon REDING. I would describe TAYLOR as a white male, slim build with brown short curly hair with facial hair of the same colour, 5ft10 tall wearing a black cap, an orange tabard, red jacket, dark grey jeans and trainers. I would describe REDING as a white male, slim build, short thinning blond hair, 5ft9 tall wearing an orange tabard with 'INSULATE BRITAIN' written in black ink on the back, a tweed jacket, pink shirt and brown boots.

At 0824 hours I arrested TAYLOR and REDING on suspicion of obstructing the highway, I cautioned them and gave my necessity as to allow for a prompt and effective investigation, to obtain evidence by way of questioning, to prevent further obstruction to the highway, to prevent loss or damage to property and to establish their names and addresses. I remained with TAYLOR and REDING, I asked them after arresting them their name, they both looked at each other and after a pause gave their first names only as Ben and Simon. I gave them my name and asked them if they had anything on them that they shouldn't have, REDING said that he had glue in the top pocket of his shirt. I removed and seized this item. As I stood with TAYLOR and REDING, I could hear other motorists driving past shouting and sounding their horns.

The carriage way was closed over the bridge on the roundabout to allow for a safe and sterile working area so that the Protestor Removal Team (PRT) could assist with the removal of the other persons who had glued themselves to the road and to each other. I walked TAYLOR and REDING to the back of our carrier, the PRT assisted with the removal of the glue from both their hands. TAYLOR and REDING were the conveyed to GRAYS Custody.

I arrived at GRAYS Custody at 1020 hours	, after a short period of waiting I took TAYLOR
through to the custody desk and booked his	m in with the Detention Officer (DO). I conducted a
search of TAYLOR'S property, amongst a b	ounch of rolled up tissues I found and a small tube of
Signature: All Macles 1987	Signature witnessed by:

2010/11

**OFFICIAL** 

#### **OFFICIAL**

MG11 (Interactive)

Page 3 of 3

glue which I seized, I also saw what I believed to be an 'INSULATE BRITAIN' banner rolled, I seized this also.

Once TAYLOR had been booked in, he said to the DO that upon his release he would go out and continue to obstruct the highway again and continue to do so until the government meets their demands. I placed TAYLOR in cell 13 and gave him a drink of water and a blanket.

Afterwards I booked REDING in and once complete I took him to cell number 10 where I gave him a blanket.

I can produce the exhibits that I seized from both TAYLOR and REDING as my exhibits, I have also printed out a map showing where the persons were in the road which I can produce as an exhibit, reference numbers:

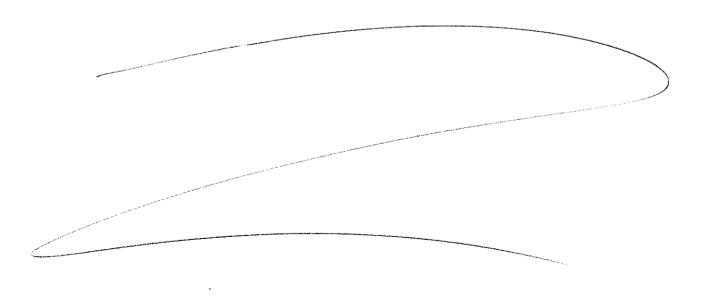
MO/01 - UHU UNIVERSAL SUPER GLUE

MO/02 - WILKO INSTANT BOND SUPER GLUE

MO/03 - ROLLED UP BANNER

MO/04 - MAP OF M25 JUNCTION 30

These are my original notes made at 1300 hours on THURSDAY the 30<sup>TH</sup> of SEPTEMBER 2021 at GRAYS POLICE STATION. *MCYARLES* 



Signature: MMCU107530}—

Signature witnessed by:

2010/11

**OFFICIAL** 

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
EXHIBIT "JS/119"	

Page 1 of 2

WITNESS STATEMENT		
Criminal Procedure Rules, r. 16.2;Criminal Justice Act 1967, s. 9; Ma	gistrates' Courts Act 1980, s	s.5B
URN		
Statement of: Thomas Anthony CLINTON		
Age if under 18: Over 18 (if over 18 insert 'over 18') Occupation: Ac	ting Police Inspector 3449	
This statement (consisting of 1. page(s) each signed by me) is true to belief and I make it knowing that, if it is tendered in evidence, I shall be wilfully stated in it anything which I know to be false, or do not believe t	liable to prosecution if I hav	
Signature: MIHST 3449 (with	ess) Date: 13 <sup>th</sup> October 2	2021

On Wednesday 13<sup>th</sup> October 2021 I was on duty in full level 2 uniform, I was in a marked Police van in company with PC 77665 Bloxham, PC 79090 Garland, PC 78924 Le-Cornu, PC 78605 Sadowski and PC 74264 Johnston, we were at Boreham Police complex. Following reports of numerous people blocking the road in Thurrock we were directed by the control room to the area to assist, we were using the callsign VG2B.

As we made our to Thurrock we received further information that the people were protesting in relation to climate change, there were reports of people adhering themselves to the road surface and that they were in multiple locations. We were directed to meet with two other personnel carriers at St Clements Way in West Thurrock, VG02A and VG02C.

Upon our arrival around 0950hrs we were met by Inspector 2651 Stokes, he directed that the persons present blocking the carriageway were to be arrested for Conspiracy to cause a Public Nuisance and removed from the carriageway. He asked that VG2B took primacy in undertaking this role with VG02C while VG01A was to provide support and security.

At 0955hrs I began to engage with the persons in the roadway, they were wearing orange tabards and I was quickly clear to me that they have glued themselves to the road surface by some means, I could see Superglue tubes discarded on the floor around the protesters. I said to several of them, who were sitting on the Northbound carriageway of St Clements Way, "PEOPLE, WE ARE LOOKING TO REMOVE YOU FROM THE ROAD NOW, ARE ANY OF YOU WILLING TO MOVE FROM THE ROADWAY OF YOUR OWN ACCORD" a few of those present shook their heads while the others remained silent. I then instructed some of the constables present to begin to engage with the protesters and encourage them to move.

At 1002 hours I began to speak with a male I now know to be Simon READING born 04/10/1972, I said to him "SIR, IS THERE ANYTHING I CAN REASONABLY SAY OR DO THAT WOULD ENCOURAGE YOU TO REMOVE YOURSELF FROM THE CARRIAGEWAY" there was no reply from the READING. I said to him "SIR, IF YOU REFUSE TO LEAVE THE CARRIAGEWAY NOW I WILL BE FORCED TO HAVE YOU REMOVED" he ignored me, I then

Signature: 344.9	Signature witnessed by:	Alm
16/08/17	OFFICIAL	

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MG11 (Interactive)

Page 2 of 2

said to him "SIR, YOU ARE GOING TO BE ARRESTED FOR CONSPIRACY TO CAUSE A PUBLIC NUISANCE". I then instructed two officers to remove the male from the road, at the time it was not practical to caution the male as we were in the middle of the carriageway and surrounded by lorries and numerous members of the public and officers.

Over the course of the following 40 minutes officers engaged with the protesters and a specialist team arrived to de-bond the protesters who had glued their hands to the road, following the successful operation to clear the road, the arrested persons were taken to Southend Police Station, while at the station I explained to the persons arrested the reasons for their arrest again and specifically cautioned READING as I was aware it had not been done at the roadside, I also informed him of the fact that his arrest was necessary for his own protection, to prevent an obstruction of the highway and to obtain evidence by questioning him.

These are my original notes, made at Southend Police Station at 1427hrs

2010/11

**OFFICIAL** 

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)</u>

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

**Claimants** 

-and-

#### (1) MADELINE ADAMS

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

		<b>Defendants</b>
E	XHIBIT "JS/120"	

### Stephen GINGELL 30/12/1965

Address -

Contact Details - None Provided.



42/MR/17715/22 Obstruct / Disrupt person engaged in lawful activity.

Circumstances of this investigation are GINGELL has been detained by Police at 12:26 hours on the 23rd of august 2022 at Exolum Fuel Storage site, Askews Farm, Lane, Gray. Essex. At approximately 06:00 hours on the 23rd August GINGELL and five other Just Stop Oil Direct action protesters gained entry to the secure refuelling compound located within the Exloum fuel storage site. On gaining entry GINGELL was challenged by staff but refused to leave, he then climbed equipment to reach the fuel pipes contained within the roof space of the pumping station. GINGELL sat on those pipes forcing the plant to halt all activity. Police specialist at working heights removal teams were required to remove GINGELL. This protest prevented the Exolum site from performing normal activity for over 10 hours.

Arresting officer Pc 80171 Barnes, Arrest MG11 attached.

Evidential Media Form completed by Pc 73659 Skinner, Exhibit JLS/BWV/H2/03 attached.

Police Case material report to CPS MG5 has been attached detailing the particulars of the criminal case.

Result – Community Order 40 hours unpaid work, £200 costs, £114 surcharge.

Justin Skinner first witness statement Claimants Exhibit JS/1-JS/121 8 August 2024

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

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	<b>Defendants</b>
EXHIBIT "J	S/121"

#### Evidential Media Form - JLS/BWV/H2/03 - Stephen GINGELL

Reviewing Officer Name: Pc 73659 Skinner

Review date: 27/09/2022

Review time start: 11:00 - 27/09/2022 Review time finish: 15:00 - 07/10/2022

This form has been generated from the viewing of officers Body Worn Video.

This form has been generated to show the scene at EXOLUM Askews Farm Lane, Thurrock, Essex and the actions of the Just Stop Oil protesters involved.

To show continuity at the beginning of every media source used you will see the below – this is to ensure you as the reader can understand what the media is, who it is from, the date and duration. This will then show how the timeline has been formed and via what media source.

If yes how long?

Source: BWV / Evidence gatherer footage / Custody image.

**BWV Clip Number:** 

Officer name (BWV/Evidence gatherer user):

Date Shown on footage: Axon Platform start time: Start time Shown on Footage: Real time (if different GMT):

Is there a delay in audio starting? Y/N

Duration of footage:

Duration of footage viewed from: Duration of footage viewed to:

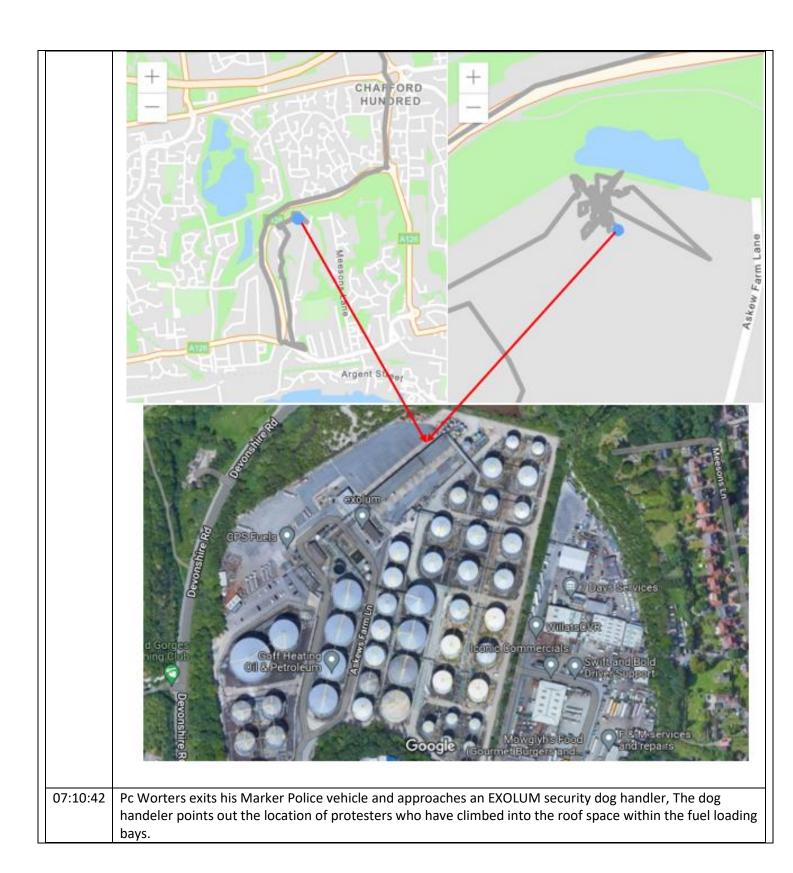
AXON BWV Reference (8 digits): Holmes Exhibit ref:

Officer Exhibit Ref:

Summary (Must have sufficient details to satisfy a review under provisions of CPIA)

Consider screen captures and direct speech and include counter times.

Screen Display Time (NOT counter time)	Summary  Highlight any information requiring redacting/editing			
	Source: BWV BWV Clip Number: Whole footage Officer name (BWV/Evidence gatherer user): Pc 71562 Worters Date Shown on footage: 23/08/2022 Axon Platform start time: 07:10 Start time Shown on Footage: 07:10:28 Real time (if different GMT): N/A Is there a delay in audio starting? Yes If yes how long? 59 Seconds Duration of footage: 1:45:04 Duration of footage viewed from: Start AXON BWV Reference (8 digits): X60418537 Holmes Exhibit ref:			
07:10:42	Officer Exhibit Ref: TWW/01  Pc 71562 Worters is the driver of a Police carrier VG1B that has been allocated to deal with the protesters who have gained unlawful access to the EXOLUM fuel storage site ASKEWS farm Lane, Grays, Essex. Pc Worters and his passengers arrive in the carpark area in front of the fuel loading bays within the EXOLUM complex. Pc Worters BWV GPS Location Map shows his location within the complex. A Google maps image shows an aerial view of the location.			





O7:11:10 Pc Worters enters the fuel loading bays with Pc 73309 Sharplin and identifies where protesters are in the roof space. Due to the darkness in the roof space, Pc Worters BWV does not capture any images of the persons in the roof space. Pc Worters walks the length of the loading bays and counts off four protesters within the roof space.



Source: BWV

BWV Clip Number: Whole Footage Officer name (BWV): Pc 2796 Mint Date Shown on footage: 23/08/2022 Start time Shown on Footage: 07:06:17 Is there a delay in audio starting? Yes

Duration of footage: 15:55

Duration of footage viewed from: Start AXON BWV Reference (8 digits): X60419962

Axon Platform start time: 07:07 Real time (if different GMT): N/A If yes how long? 59 Seconds

Duration of footage viewed to: Finish

Holmes Exhibit ref:

Officer Exhibit Ref: JDM/01 07:11:08 Ps Mint locates site security within the EXOLUM complex and identifies where the protesters have gained access to the site. Ps Mint moves to that location which is now being guarded by a site dog handler, laying on the floor is a section of blue carpet (Circled in white) and a telescopic ladder, the dog handler explains they were used to cover the barbed wire and to scale the fencing in order to gain entry to the site. 2022-08-23 07:13:25 +0100 AXON BODY 3 X60419962



Source: BWV

BWV Clip Number: Whole Footage

Officer name (BWV/Evidence gatherer user): Pc 73309 Sharplin

Date Shown on footage: 23/08/2022 Axon Platform start time: 07:15
Start time Shown on Footage: 07:14:19 Real time (if different GMT): N/A
Is there a delay in audio starting? Yes If yes how long? 59 Seconds

Duration of footage: 21:30

Duration of footage viewed from: Start Duration of footage viewed to: Finish

AXON BWV Reference (8 digits): X60418422 Holmes Exhibit ref:

Officer Exhibit Ref: IS/01

07:18:35

Pc 73309 Sharplin is nominated by Ps 2796 Mint as the officer to accompany the representative from the EXOLUM site. He and Nick are to make the appeals for all protesters to leave the site. EXOLUM site rep Nick is circled in white. Pc Sharplin receives a short briefing on the five step appeal from Ps Mint.

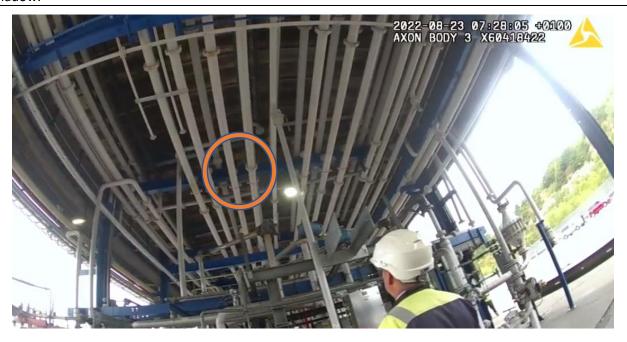


O7:25:00 Pc Sharplin and the site rep Nick approach the loading bay L where two protesters (circled in Orange) are sitting on the pipes in the roof space. Nick calls out to the pair then informs them that they are trespassing, he informs them of the dangers their presence possess in that area due to the flammable atmospheres, Nick requests that they come down and leave the area. Once Nick has made his appeal, Pc Sharplin makes his appeal for them to come down from the roof space, he reiterates the danger that they are in and informs them they will be arrested for aggravated trespass. Neither of the protesters comply with either request to leave. Due to the height and darkness in the roof space the BWV only captures glimpses of the protesters, the orange vest and florescent yellow vest the pair are wearing and the protesters legs can be seen, when Nick and Pc Sharplin call up a male and female voice respond.



O7:28:04 Pc Sharplin and the site rep Nick move down to loading bay K and approach a lone male protester (circled in Orange) who is sitting on the pipes in the roof space. Nick calls out to the male who acknowledges the hail, Nick then informs him that he is trespassing, he informs him of the dangers his presence possess in that area due to the flammable atmospheres, Nick requests that he comes down and leave the area. Once

Nick has made his appeal, Pc Sharplin makes his appeal for him to come down from the roof space, he reiterates the danger that he is in and informs him he will be arrested for aggravated trespass. The protester does not comply with either request to leave. Due to the height and darkness in the roof space the BWV only captures the males legs when he moves them, at all other times he is fully obscured by the shadow.



O7:30:00 Pc Sharplin and three members of EXOLUM staff discuss how many protesters there are at this site, how they got in and how many they have left to del with. The site staff state six protesters gained access by throwing carpet onto the barbed wire and climbing over the fence. One of the protesters was aprehended by site staff and escorted to the front gate immediately, this leaves the five protesters at this location that are in the roof space and on the cylinder near to the loading bays. Pc Sharplin confirmes that the female protester that was aprehended and escorted to the front gate is with Police at this time.



07:30:57 Pc Sharplin and the site rep Nick move down the bays again to bay H and the approach a lone female protester (circled in Orange) who is sitting on the pipes in the roof space. Nick calls out to the female who

acknowledges the hail, Nick then informs her that she is trespassing, he informs her of the dangers her presence possess in that area due to the flammable atmospheres, Nick requests that she comes down and leave the area. Once Nick has made his appeal, Pc Sharplin makes his appeal for her to come down from the roof space, he reiterates the danger that she is in and informs her she will be arrested for aggravated trespass. The protester does not comply with either request to leave. Due to the females position on the pipes in the roof space the BWV only captures her face, however due to the distance no distinct facial features can be made out.



O7:32:33 All five protesters in and around the loading bay area of the EXOLUM site, Askews farm Lane, Grays including GINGELL have been informed by site staff and police that they are trespassing, all have been requested to leave. All five protesters including GINGELL have acknowledged the requests and have refused to leave. Pc Sharplin deactivates his BWV.

Source: Evidence Gatherer BWV Clip Number: 00008

Officer name (BWV/Evidence gatherer user): Pc 72527 Baker

Date Shown on footage: 23/08/2022 (Verbal) Axon Platform start time: N/A Start time Shown on Footage: 07:24 (Verbal) Real time (if different GMT): N/A

Is there a delay in audio starting? No

Duration of footage: 1:57

Duration of footage viewed from: Start Duration of footage viewed to: Finish

AXON BWV Reference (8 digits): N/A Holmes Exhibit ref:

Officer Exhibit Ref: KB/01A Disk 1

Pc 72527 Baker records the EXOLUM site representative ad Police informing Protesters that they are Trespassig and are required to leave, Pc Backer records GINGELL (Circled in white) in the roof space of bay

If yes how long? N/A

L

07:24







Source: BWV

**BWV Clip Number: Whole Footage** 

Officer name (BWV/Evidence gatherer user): Pc 80171 Barnes

Date Shown on footage: 23/08/2022 Axon Platform start time: 11:42
Start time Shown on Footage: 11:41:46 Real time (if different GMT): N/A
Is there a delay in audio starting? Yes If yes how long? 59 Seconds

Duration of footage: 01:53:21

Duration of footage viewed from: Start Duration of footage viewed to: Finish

AXON BWV Reference (8 digits): X60411461 Holmes Exhibit ref:

Officer Exhibit Ref: DJB/06

11:41:46 Pc 80171 Barnes activates his BWV and records the at heights team praparing to remove protetsters

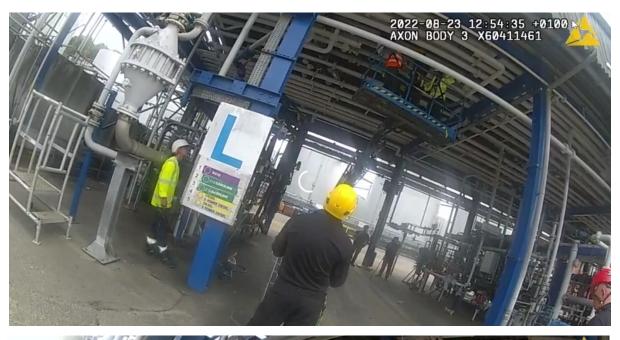
including GINGELL from the roof space.



Pc Barnes acends in a boon lift to the roofspace where GINGELL is sidding on the pipes, Pc Barnes asks if GINGELL can hear him, GINGELL confirms that he can. Pc Barnes then arrests GINGELL for agravated trespass and cautions him then provides the nesasity for the arrest. Pc Barnes does remove his BWV but does not possition it in a way that captures a clear image of GINGELL who is sitting on the pipes in front of the at heights officer, GINGELL's leg can be seen indicated by a white arrow. GINGELL makes no comment following arrest.



12:54:24 GINGELL is lowered into a boon lift by the at heights team and then lowered to the ground. Once on the ground the at heights team de-harness and hand GINGELL over to Pc Barnes and Pc Sharplin, Pc Barnes asks GINGELL his name, GINGELL replies "STEPHEN". Pc Sharplin then takes controle of GINGELL and escorts him to a waiting Police carrier. Pc Barnes and Pc Shrplin convey GINGELL to Grays custody, GINGELL remains silent throught the journey.







The images above show GINGELL at the EXOLUM fuel storage site on the 23<sup>rd</sup> August 2022, GINGELL has gained unlawful access to the site and has been requested to leave by both site staff and Police but has refused. The footage shows GINGELL being informed by site staff and Police that he is trespassing. The footage shows GINGELL in the roof space, where he sits on the fuel pipes. It also shows GINGELL being Arrested for aggravated trespass by Pc Barnes.

The images below have been obtained from Pc Barnes BWV footage following GINGELL's arrest at the EXOLUM site, and a photo taken during his custody booking in process where GINGELL was allocated the custody reference number -42BZ/2474/22







During the creation of this exhibit I fully reviewed the BWV footage of Ps 2796 Mint, Pc 77543 Baldwin, Pc 73309 Sharplin, Pc 78511 Roll, Pc 80072 Clarke, Pc 80171 Barnes, Pc 78971 Harper, Pc 71562 Worters and the Evidence Gatherer footage presented by Pc 72527 Baker. Most of that material is not represented in this Exhibit, however none of that material I reviewed contained anything that could undermine this investigation or assist the defence at court.

#### **Initial Disclosure Assessment of footage**

For disclosure I have considered whether there is any material which might reasonably be considered capable of undermining the case for the prosecution against the accused, or of assisting the case for the accused. Any material required to be supplied under paragraph 7.3 of the code.

Supply Details:

Signature of reviewing officer:

c 73659 Skinner

Time/Date of completion: 15:00 - 07/10/2022

#### **Check List: (tick when complete)**

- 1. Update the DS of your completion.
- 2. Notify OIC/Disclosure officer of anything evidential or meeting disclosure test
- 3. Has officer provided a statement producing footage?
- 4. Has BWV Officer Exhibited BWV correctly:
- 5. Has BWV Officer Exhibiting BWV saved footage correctly?
- 6. Ensure footage burnt to disc
- 7. Ensure exhibit is on HOLMES
- 8. Place review document into MIR Submitted for Holmes folder for registration.