

## STATUTORY DECLARATION

I, ROBERT ANDREW LITVOI, of [REDACTED]  
solemnly and sincerely declare as follows:

1. I was living in a small caravan for quite a while on the access road to Hampstead Heath between The North and South Fairground Sites, Vale of Health London NW3 1AU in 2003-2004 having previously stayed with friends in Southend Road Hampstead NW3 2PT in 2001
2. In late 2004, I was conversing with Mr Frishman Senior, who was concerned for the security of his then unoccupied land known as The South Fairground Site, Vale of Health London NW3 1AU. Illegal fly-tipping, potential occupation of the land by persons unknown to Mr Frishman and a growing rodent population on the land were his main concerns
3. Mr Frishman and I came to an agreement whereby I would occupy the site and in return I would do all that was reasonably possible to deal with Mr Frishman's concerns, indicated in item 1. above and look after the maintenance of the land and various structures forming part of the land
4. Mr Frishman unlocked the smaller gate and showed me around The South Fairground Site. Mr Frishman then gave me the key to the large gated entrance to the land known as The South Fairground Site impressing upon me that I should take care that the key should be kept safe as it was the only one and that I should only return it personally to Mr Frishman at his request. This key remained in my possession from 2004 until I vacated the site at the end of 2016
5. In late 2004 I moved two caravans into the site, a red one and a white one which are still there today and I took up residence in the caravans within The South Fairground Site
6. Mr Frishman senior regularly visited me to check that I was adhering to my side of the agreement and after several instances of heavy rainfall Mr Frishman encouraged me to build a security and maintenance/tool shed to protect his maintenance equipment and tools. This I did at my expense in the later part of 2004. The tool shed was situated within The South Fairground Site adjacent to the fencing running along the boundary with the access road
7. Early on Mr Frishman visited weekly but those visits became less frequent as he was pleased with my upkeep of his property and he also warmly welcomed my offering shelter to struggling people of good character.

8. After around 3 years Mr Frishman senior's visits stopped and as he had never given me any address or telephone contact information I was unable to stay in touch with him
9. I continued living on The South Fairground Site for around 12 years since 2004 without interruption initially living in caravans and in 2005 I built a house from reclaimed timber for me to live in. The basic structure was completed in 6 months and I was then able to live in it whilst continuing to improve my facilities there by upgrading, repairing and providing new water proof coverings as required. The building had two levels with the upper floor being accessed by steps and having views over the pond adjacent to the site
10. I acquired additional caravans in the early years and at various points I gave refuge to a number of different people who lived in the caravans I provided on The South Fairground Site.
11. Joe approached me in 2010 asking if he could bring a small caravan onto the site to play music from. Joe ended up occupying 2 caravans and built a yurt structure between and in front of the caravans, as well as building a toilet shed next to Robbie's house. Joe occupied part of the site from 2010 until we started getting pressure from Mr Frishman Junior to vacate the site towards the middle to end of 2016
12. David occupied a caravan and built himself a kitchen area in a corner of the site adjacent to the pond from before the middle of 2011 until late 2016
13. Alicia lived in a caravan adjacent to David's area of the site from early 2012 until late 2016
14. Ollie occupied a caravan with an awning attached adjacent to Spencer House from mid-2012 until we all left at the end of 2016
15. Simona occupied the small Monza caravan on the access road, which had been next to the compound entrance since 2003, without having moved. This was the caravan I lived in from 2003-2004
16. There were 8 caravans, one with an awning, various timber and brick sheds together with the timber house that I constructed on The South Fairground Site when I vacated. The majority of these had been on the site for in excess of 10 years although 3 of the caravans were brought in later but have been on the site for at least 4 years

17. I have seen a drawing of the site prepared by The Design Works dated March 2017 with the drawing number 170324/E/01 RevA and I can confirm that this depicts the arrangement of my timber house and the caravans and sheds that were on site although some of the smaller shed buildings next to the boundary fencing have been removed. This drawing is appended to this Statutory Declaration

18. I have also seen printed records of twelve sheets of photographs with hand written notes Titled The South Fairground Site London NW3 1AU Sheets 1 of 12 to Sheet 12 of 12 and can confirm that these sheets depict an accurate picture of The South Fairground Site in 2016 before I vacated. These documents are appended to this Statutory Declaration

Appended to this document are: -

- The Design Works Drawing No 170324/E/01 Rev A
- The South Fairground Site London NW3 1AU Sheet 1 of 12
- The South Fairground Site London NW3 1AU Sheet 2 of 12
- The South Fairground Site London NW3 1AU Sheet 3 of 12
- The South Fairground Site London NW3 1AU Sheet 4 of 12
- The South Fairground Site London NW3 1AU Sheet 5 of 12
- The South Fairground Site London NW3 1AU Sheet 6 of 12
- The South Fairground Site London NW3 1AU Sheet 7 of 12
- The South Fairground Site London NW3 1AU Sheet 8 of 12
- The South Fairground Site London NW3 1AU Sheet 9 of 12
- The South Fairground Site London NW3 1AU Sheet 10 of 12
- The South Fairground Site London NW3 1AU Sheet 11 of 12
- The South Fairground Site London NW3 1AU Sheet 12 of 12

**AND I MAKE THIS DECLARATION SOLEMNLY BELIEVING THE SAME TO BE TRUE BY VIRTUE OF THE STATUTORY DECLARATION ACT 1835**

Signed: [Redacted] R A Litvoi  
Declared at: [Redacted]  
The 31<sup>st</sup> day of March 2017 [Redacted]  
Before me: [Redacted]

A solicitor empowered by the law to take oaths.